From: Toth-Allen, Jean
Sent: Thursday, November 30, 2006 10:55 AM
To: [Redacted]
Subject: RE:

Dear [Redacted]:

Thank you for your inquiry regarding waivers with regard to study criteria.

Good clinical practice requires that a clinical study be conducted according to the study protocol agreed upon, unless the safety and welfare of the study subjects are compromised. Inclusion/exclusion criteria, which I assume these laboratory values represent, are essential to ensuring the uniformity of the study population. Waivers of study specifics such as these are not recommended, as the resulting population may therefore no longer be sufficiently uniform to allow meaningful study conclusions to be drawn.

In this specific instance, it appears that the protocol was written with a specific number as the lowest value for the parameters in question that would indicate acceptable admission into the study. As the study is being conducted, it appears that a decision has been made to allow a difference in the 2nd decimal place of the chosen number. If this decision is clinically acceptable, the sponsor should merely alter the protocol for the entire study to reflect that change rather than allow waivers/exceptions in this regard. A practice of allowing waivers sets the wrong precedent - giving the impression that individual divergence from protocol specifics is allowable and acceptable. Such a mindset among the clinical investigators could undermine the integrity of the study data and render the entire study useless.

Hope this information is useful. If you need further information and/or have additional questions, please submit them once again to the official GCP mailbox, gcp.questions@.fda.hhs.gov, in lieu of responding to my personal e-mail address.
Sincerely yours,

Jean Toth-Allen, Ph.D.
Good Clinical Practice Program
OSHC, Office of the Commissioner, US FDA

This communication does not constitute a written advisory opinion under 21 CFR 10.85, but rather is an informal communication under 21 CFR 10.85(k) which represents the best judgment of the employee providing it. This information does not necessarily represent the formal position of FDA, and does not bind or otherwise obligate or commit the agency to the views expressed.

-----Original Message-----
From: [Redacted]
Sent: Thursday, November 23, 2006 11:25 AM
Cc: [Redacted]
Subject:

Dear Madam, dear Sir

We are currently conducting a clinical trial on [Redacted] with biological criteria for randomization of patients such as [Redacted]. These parameters are the efficacy criteria of the study. We have been establishing waivers on these randomisation criteria with the rule that only would be acceptable values within the limit of the accuracy of the dosing method e.g. a [Redacted] value of [Redacted] would be authorized when the value to be randomized is >= [Redacted]. These waivers are not allowed for safety parameters. These waivers are authorized by the sponsor and are fully documented in the sponsor's and investigator's files.

Your advice on the acceptability of such waivers would be helpful.
Thanks
Best regards

[Redacted]