From: Toth-Allen, Jean
Sent: Tuesday, August 01, 2006 9:53 AM
To: [Redacted]
Subject: RE: Monitoring Compliance Questions

Dear [Redacted]:

Thank you for your inquiries regarding monitoring and monitoring reports. Please excuse our delay in responding.

While monitoring is required by FDA regulations governing both pharmaceutical and device clinical studies, there are few specifics in the regulations and the only guidance in this regard that is presently available is very general. When FDA inspects either a sponsor or a clinical site, monitoring reports are commonly reviewed but any issues regarding non-compliance with regard to monitoring would be based on the FDA-investigator's direct observations. Lack of adequate monitoring can manifest itself in many ways. The main area in this regard that is tracked by FDA is sponsor compliance with the need to actually do study monitoring and the adequacy of any monitoring done. Inadequate monitoring (which would include complete lack of monitoring) is the most frequently cited non-compliance during sponsor inspections and this is true across all product types studied under FDA regulations.

Such organizations as the Association of Clinical Research Professionals (ACRP) (http://www.acrpnet.org), The Society for Clinical Research Associates (SoCRA) (http://www.SoCRA.org), and the Regulatory Affairs Professionals Society (RAPS) (http://www.raps.org/s_raps/index.asp) may have statistics on the present status of monitoring reports in the industry as well as regarding compliance with monitoring SOPs, since a large part of the membership of each of these groups is involved in the monitoring of clinical studies.

Until fairly recently I was a reviewer in the Division of Bioresearch Monitoring (DBM) in the Center for Devices and Radiological Health (CDRH) as well as an active member of their outreach program. Therefore, I am aware that the Director of DBM has prepared a presentation regarding the usefulness of applying the quality systems approach, required for device manufacturing via the Quality System Regulation (QSR) (21 CFR Part 820), to the conduct of clinical trials. Since CAPA is a part of QSR, I am therefore assuming that your inquiry results from hearing or hearing reports of this presentation. In the presentation, CAPA, as you can imagine, becomes the system to report and investigate problems and potential problems within an on-going study, the normal purview of monitoring. That presentation has been given in part or whole to many audiences, including via a Webcast last November. However, this is just an interesting idea for applying an approach already familiar to the device industry to clinical trials, as a means for improving their quality from the start. It is not official FDA guidance and there is no intention of it becoming guidance in the near future, never mind regulation.

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, gcpquestions@oc.fda.gov, in lieu of responding to my personal e-mail address.

Sincerely yours,

Jean Toth-Allen, Ph.D.
Good Clinical Practices 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.

From: [Redacted]
Sent: Monday, July 24, 2006 8:22 PM
To: [Redacted]; OC GCP Questions
Subject: RE: Monitoring Compliance Questions

Dear Staff
In follow-up to the question below, I have heard that FDA will be requiring CAPA systems for clinical research and was wondering if you could provide any references that might specify expectations regarding documentation of CAPA plans in monitoring trip reports. Thank you for your assistance.

Regards,
[Redacted]

From: [Redacted]
Sent: Monday, July 24, 2006 6:05 PM
To: 'gcp.questions@fda.hhs.gov'
Subject: Monitoring Compliance Questions

Dear FDA GCP Program Staff

I am doing some research for a client and had a question that I thought you could help with. Do you find any needs, issues or trends associated with standardizing and automating of monitoring trip reports? Do you have any updated facts or figures on sponsor compliance with monitoring SOPs? Are you seeing any trends in FDA inspections that observe more / less non-compliance in monitoring reporting, and follow-up of action items identified in monitoring trip reports?

I'd greatly appreciate any insights that you have or if you can point me to the right place or person for additional information.

Regards,
[Redacted]