Regulatory agencies and Quality in Clinical trials

August, 23rd, 2011
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1. Points to consider (1/2)

1.1. Global environment for clinical trials

- Life cycle of the product
- Geographic Globalization
- Sponsor characteristics (SME, Big pharma...)
- Multiplication of CROs and Vendors
- Development plans (Early phase, adaptive design, PASS...)
- Technical evolutions (IV/WRS...)
1. Points to consider (2/2)

1.2. Current European environment for C.T.

- No IND like process
- Clinical trial authorisation and oversight by National C.A.
- National and European level procedures for Marketing authorisation
- 3 forums for cooperation and harmonisation
  - Group for the Devpt of guidelines for the CT Directive
  - Clinical Trial facilitation group (CTFG): CT assessors
  - GCP Inspector Working Group (GCP IWG): GCP inspectors
2. How R.A. can help

2.1. Involvement in Risk based approach, Definitions and Tools

Risk based approach, ICH Q9

1. Acceptable risk / quality:
   - Trial patient safety and integrity
   - Reliability and accuracy of the Trial results
     - Primary endpoints
     - Secondary endpoints

Common definition on Acceptable risk / quality
- With scientific / medical / methodological signification
- For Regulators (CT assessors, MA assessors, GCP inspectors), Sponsors, Investigators, Insurance companies…
2. How R.A. can help

2.1. Involvement in Risk based approach, Definitions and Tools

2. Risk identification and assessment

- Origin of the risk
  (IMP, Trial design / procedures, capacity of the sites)

- Categorization

Common Risk assessment Tool?
(Must be simple…)

Initiatives and discussions: CTTI, MHRA-DRC-DH, EMA GCP IWG – CTFG, Bfarm-Adamon, Afssaps-Optimon, OECD
2. Risk-adapted approaches

- Trial related activities concerned
  - Information submitted to the Authority
  - Product traceability (including labelling)
  - Monitoring
  - Safety surveillance and reporting

Common approach on Adaptation of Standards?

- Approaches by
  - Sponsors
  - Competent authorities
    - Assessment purpose
    - Inspection purpose
2. How R.A. can help

2.2. Focus on what matters for Assessment and inspection

- Assessment of clinical trials and clinical trial results
  - Authorization and follow-up of clinical trials
  - Clinical trial results in Marketing authorisations
  - **Adequation/adaptation of the requested documentation**
  - **Clear rules for assessment**
    - Definition of the critical elements
  => Clear rules for sponsors

*Initiatives and discussions in European forums:*
  - Group for the Devpt of guidelines for the CT Directive:
    - Discussions on requirements adapted to the foreseeable risk?
  - CTFG: harmonisation of practice / Voluntary harmonized procedure
2. How R.A. can help

2.2. Focus on what matters for Assessment and inspection

- Inspection of clinical trials
  - Understandable inspection process
  - Defined criteria for selection of trials, organisations, sites including Risk based approach
  - Harmonized approach on fields and data inspected

  Initiatives and discussions in European forums:

  - EMA  GCP IWG-CHMP : Triggers for inspection, 2001 (under revision)
  - GCP IWG-CMDh : Points to consider / generic applications, 2004
    Triggers for inspections / BE trials, 2011
  - GCP inspection policy, 2006
  - GCP IWG – CTFG : Coordination of inspections outside MA context (Draft)

  - EMA – FDA Initiative on GCP inspections
2. How R.A. can help

2.3. Information, Assistance, Education

- Information
  - of stakeholders
    - Guidances on expectations
    - Policies and processes
      (i.e. MRC/DH/MHRA project on R-B approaches to the mgt of CT
       (MHRA R-B inspection process, FDA Model for Site selection…)
    - Feed back of evaluation and inspection,
      (programs, findings…)
    - Working groups on Clinical trials
      Afssaps: 2 groups,
      Evaluation
      GCP

- exchange between authorities
  - Programs, findings, sites of interest (Central lab, BE CROs…)

Afssaps
Agence française de sécurité sanitaire
des produits de santé
2. How R.A. can help

2.3. Information, Assistance, Education

• Assistance
  - Scientific advice
  - Afssaps: Advice for advanced product developments

• Education
  - Afssaps, training of investigators:
    - 2009: guidance document for training for investigators
      http://www.afssaps.fr/Activites/Essais-cliniques/Formation-des-investigateurs/(offset)/2
    - 2011: initiative with High School of Public Health and Cengeps, in collaboration with representatives from University, Public and Private sponsors, CROs, Investigators, to dispense training courses for trainers.
  - CTTI / FDA Training course
Thank you for your attention

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