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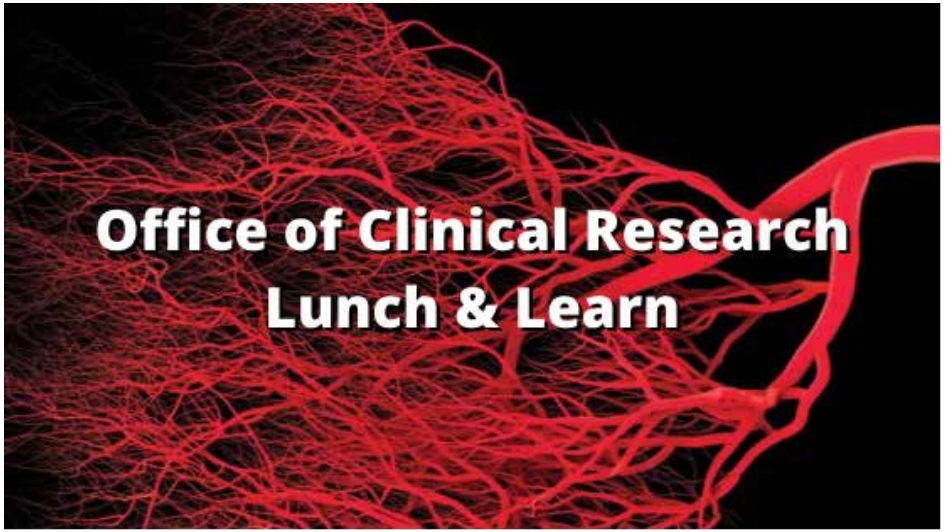
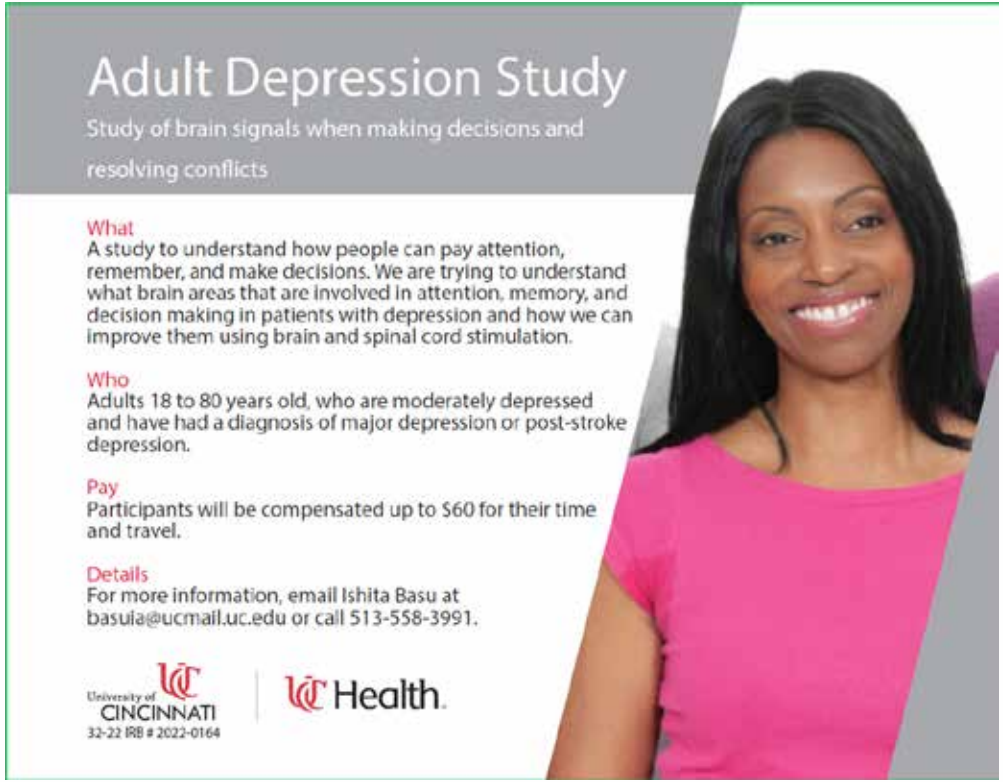


FDA Audits: Preparation, Lessons Learned, and FAQ

Thursday, May 18th, 2023

University of CINCINNATI

May 2023 Study of the Month:



Compliance Corner

Recently updated OCR SOP: Greenphire ClinCard Participant Compensation and Reimbursement System

This document details the procedures for the use of Greenphire ClinCard Participant Compensation and Reimbursement System at UC Health:

UCH-OCR-OPS-SOP-005Greenphire ClinCard Participant Compensation and Reimbursement System-03

All OCR SOPs are accessible from the UC Health intranet home page utilizing the Compliance 360 policy search function

This SOP will also be provided on the UC College of Medicine SOP Template

REMINDER: The New Office of Clinical Research COM Bearcats Landing Webpage:

The older OCR Bearcats Landing website has migrated to a NEW and IMPROVED webpage under the College of Medicine Bearcats Landing website.

As of March 29th, 2023, the New OCR COM Bearcats Landing webpage is Live.

If you attempt to log on to the old OCR website, you will be redirected to the new webpage.

Click here for the new OCR COM Bearcats Landing Webpage

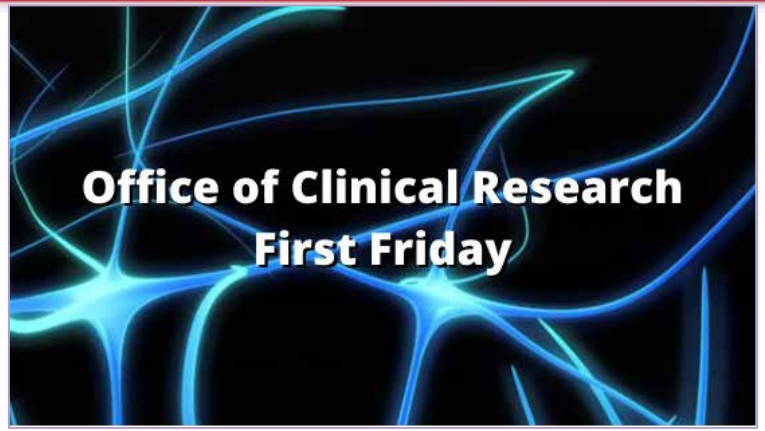
UC / UC Health
Clinical Research Orientation and Training (CRO&T)

Thursday, June 8th, 2023
9:00 am - 3:00 pm
Virtual presentation

The last day of registration is Friday, June 2nd, 2023

Register Here

Please reach out to Nate Harris,
nate.harris@uchealth.com for any questions



Friday, June 2nd , 2023

Electronic Informed Consent (e-Consent): Tools, Best uses, and FAQ

Maxx M. Somers, MA
CCHMC
Information Services For Research (IS4R)
Manager, IS
REDCap Program Manager

University of CINCINNATI

UC/UCH Clinical Research Professional

TODAY!!!!

May 18th, 2023, 5:00pm – 8:00pm

OTR Stillhouse

2017 Branch St, Cincinnati, OH 45214

Today's Presentation:

FDA Audits: Preparation, Lessons Learned, and FAQ

Kristy Espay, CCRP
Research Operations Manager
UC/UC Health Department of Neurology

Tiffany Rupert, CCRP
Clinical Research Manager
University of Cincinnati
UC Waddell Center for Multiple Sclerosis

Kalen L. Butcher
Senior Clinical Research Professional – Regulatory
Department of Neurology

FDA Inspection

Presented by: UC Neurology Department and UC IRB

FDA

Food and Drug Administration

Agency within the U.S Department of Health and Human Services with a responsibility for protecting public health.

- Safety
- Efficacy
- Quality
- Security

Types of FDA Inspections

- Pre-Approval
  - FDA Audit Readiness Inspection (3rd party provided by Sponsor)
- Routine
- Compliance Follow-Up
- For Cause

*Includes studies that may be closed at your site (sponsor FDA approvals)

Notification

- Site received phone call on Thursday 3/9 for notification of a Tuesday 3/14 arrival.
  - Obtain name, contact, inspection focus, dates on site, any other inspectors
- Our PI was going to be out of town. What do we do??
  - Called the inspector, provided the information and asked her how she would like to proceed.

No written correspondence allowed until 482. Call her or see you 3/14!

Notification
Who do *WE* notify?

Immediately: PI, Study Staff, Sponsor, CRO and IRB

As soon as possible: Department administration and staff, UC Health Clinical Operations, Ancillary Services (IDS, Infusion, Radiology, Lab) OCR, Legal, Compliance

Prior to Inspection

- Look for red flags throughout the study
- Know how FDA conducts BIMO inspections (both Clinical Investigators and Sponsor-Investigators). Review inspection guides: (https://www.fda.gov/media/75927/download)
  - Ensure your policies, procedures, and study design align with being able to meet FDA's expectations

    *GCP regulations *ICH guidelines *Protocol *SOPs
- Always be FDA inspection ready

How Prepared Are You?

Did you have a pre-inspection audit? We did!

Action Plan for you and your team

- Availability of pertinent staff
- Cancel other agenda items
- Assign roles to individuals
- Be prepared to be “interviewed” at opening meeting
- Prepare YOUR PI!
- Determine “command center” location & prep your department

How Prepared Are You?

Action Plan for you and your team

- Determine location inspector will be working and always accompany them
  - Consider quiet space, away from other staff, empty but comfortable room
- Prepare other staff for inspection – keep doors closed, no conversations in hallway, no PHI on printer/fax,
- Do a mock interview
- Have preplanned “audit” email lists or text message group programmed and ready for quick urgent messaging needs

How Prepared Are You?

- Monitor the study monitor (are/were they communicating with us regularly)
- Have meeting with ancillary services to prep/discuss
- Review any FDA guidance documents so you're knowledgeable and prepared
- Do a refresher of key events that took place during the study
  - Any SAEs, protocol deviation, situations that you'll be asked to elaborate

Inspector Arrival – Opening Meeting

Notice of Inspection FDA Form 482 and credentials provided

- Review badge/credentials and receive FDA 482
- 482 must be in the name of the person who will sign
- It didn't have to be the PI (next in charge)
- Visiting another location? Another 482 will be issued for that address

*Inspector said she could not *sign* but could *print* her name on site visit log

Opening Meeting

Asked lots of questions!

- Credentials for PI
- Experience/background for other study staff
- What role did you serve
- Tell me about your study experience
- Organizational chart for department
- Provide me with the list of PI studies from last 5 years
- Tell me about this study…..

Take notes because the sponsor will ask

Be honest!

Conducting Inspection – Team Approach

- Several team members available to copy, download on a thumb drive and maintain a list of all requests
- Develop a shared working document that everyone can update with notes and requests
- Complion – difficulty with finding documents; sat with her and found each item which was vital to our success.
- IRB approvals were already printed b/c of pre-Inspection
- Utilized Microsoft Teams to house central team correspondence and audit updates as discussions were held with the auditor

What Will the FDA Want to See?
High Priority/Interest

- IRB of record approvals
- All approved consents
- All 1572s
  - Locations listed
- CVs/Licenses
- Training

- Signatures of labs and/or safety data
- Proof of PI oversight
- Delegation of Authority
- Inclusion/Exclusion and timelines of enrollment
- Correspondence

What Will the FDA Want to See? Cont.

- Sponsor correspondence
- Every Newsletter
- Reviewed specific timeframes for when sponsor sent correspondence and when site acted.
- Complion - 21 CFR Part 11 documents

- Sponsor Financial Disclosure Forms
- List of all PI studies in the last 5 years
- Calibration records on site equipment used for study
- Temperature logs
- IRB of record roster
- Site SOPs/NTFs

Participant Files

- Source Binders were provided to the Inspector
  - Only provide exactly what they ask
  - If you don't understand a question, ask to rephrase it
  - Don't have an answer? "Let me find out…
- Ensure charts are easy to follow, tabs to label visit, progress notes, ICF w/ documentation of process
- EDC – Inspection trails were reviewed
- EPIC - Extract all necessary information & document
- Conmed and AE logs.
- Document participant communication
- File communication from sponsor regarding the participant
- Charting Process – Who, what, when?

End of Each Day

- Call with Sponsor to summarize visit
- Update the PI in person or by phone
- RAVE Alert update - notified a UCH compliance department contact to send each morning and evening
- UC IRB update – while the regulatory was being reviewed

Tour of Facility

- Conducted on the last day of inspection
- Know what areas will be inspected so proper notification can be given
  - Have equipment records ready; stickers are current
  - Is it clinic equipment, research equipment or both
- Speak to badge access/room access
- Subject Matter Experts should be present
  - Pharmacist should speak about the drug process - IDS at UCGNI and UCH
  - Infusion nurse manager and infusion specific pumps
- Any other research specific space

Close Out Meeting

Inspector will immediately disclose if a 483 is being issued.

Summarize any observations. They may not result in a 483. However, the Inspector may ask you to immediately “respond” to observations for the close out report.

Notable findings included:

- Flu Shot not documented on con med log, but was in an Epic note from PI
- Known overdose of drug (Weight-based dosing from previous visit weight)
- EDSS score/ source discrepancy was still noted as 3 (but it should have been 3.5)

Won’t receive a “formal report” for up to six months

After the Inspection

- Communicate internally, with the Sponsor, CRO, and with FDA
- If no form 483 was issued, celebrate!
- If a form 483 was issued, respond within 15 business days
- Note the impact of receiving a Warning Letter
  - Warning Letters need to be reported to potential Sponsors and can negatively impact research relationships
  - https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/compliance-actions-and-activities/warning-letters
- Expect inspections to increase based on new report from the US Government Accountability Office
  - https://www.gao.gov/products/gao-23-104721

Lessons Learned

- A known protocol deviation, reported by the site to IRB, sponsor, patient (if necessary) can STILL result in 483!
- Have all records of calibration equipment used in the study (infusion pump records)
- Initiating a QA process – was vital to our success
- You may not be issued a 483 at the close out meeting - doesn't mean you won't be issued one later in the process

Lessons Learned Cont.

- Be prepared to explain PI oversight and sponsor oversight- communication throughout study is crucial
  - They will be looking for evidence of the story you're telling
- Having a prior audit prepared us for success
- Have details noted in CTA or Site Selection letters about systems being used (Vestigo, Complion)
- **Document Everything! And Then Double Check!**
- Remain professional and courteous - good attitudes go a long way. The right personality is needed.

Changes Moving Forward

- Institutional FDA Process to help with clarity
- UCH Competency Development
- Resource tools provided to Research departments
- Develop QA process for your department
  - Have it documented