Site Monitoring Visits: What to Expect and How to Prepare

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Presenter Disclosure

The following relationships exist related to this presentation:

No Relationships to Disclose
Why do we conduct site monitoring visits?
Purpose of Monitoring

ICH Guideline for GCP (Section 5.18.1)

- The rights and well-being of human subjects are protected
- The reported trial data are accurate, complete, and verifiable from source documents
- The conduct of the trial is in compliance with currently approved protocol/amendment(s), with GCP, and with applicable regulatory requirement(s)
Types of Site Visits

- Site Qualification Visit
- Site Initiation Visit
- Interim Monitoring Visit
- Close-Out Visit
Frequency of Site Visits

- ICH Guideline for GCP (Section 5.18.3)
  - “…in general there is a need for on-site monitoring, before, during, and after the trial…”
- Visits may be as frequent as every 4-6 weeks or as infrequent as every few years
- Frequency and scope of visits determined by the sponsor
Components of a Site Visit

- Facility and Staff Review
- Study Product Review
- Regulatory Review
- Study and Source Documentation Review
- Summary Meeting
Facility and Staff Review
Facility and Staff Review

- Facilities
  - Clinics, test article storage area, procedure rooms, labs
- Staffing
  - Changes, new staff in need of training
- Equipment
  - Storage, calibration
Facility and Staff Review

- Study Product Storage
- Specimen Storage
  - Blood, serum, biologic
  - Refrigerators/freezers (SOPs for failure)
  - Secured areas
  - Tracking, shipping, labeling mechanisms
Study Product Review
Study Product Review

• Staffing and Personnel
• Study Product Storage
  • Product received or familiar with process for obtaining product
  • Refrigerators/freezers (SOPs for failure)
  • Temperature logs and associated documentation
  • Secured areas
Study Product Review

- Study Product Accountability
  - Product received or familiar with process for obtaining product
    - Chain of Custody form
    - Dispensation and disposal logs
    - Accountability forms
  - Expiration dates and/or times
Regulatory Documentation

- See ICH Section 8: Essential Documents for the Conduct of a Clinical Trial
- Protocol
- IRB Approved Informed Consent Document
- FDA Form 1572
- Curriculum Vitae
- Medical Licenses
- Financial Disclosure
Regulatory Documentation

- Investigator’s Brochure
- Lab Certifications/License
  - CAP/CLIA
- Lab Normal Range Values
- Correspondence
- SAE Reports
- Recruitment materials
Study and Source Documentation Review
Study and Source Documentation Review

- Census
  - Status of enrollment
  - # enrolled, # withdrawn, # completed
- Informed Consent Form Review
  - Signed, dated, per 21 CFR 50.27
  - May require Signature of Witness and Consenter
  - Originals on file
  - Correct version
Study and Source Documentation Review

- CRF Review
  - Complete and correct
  - Verify against source documentation
  - Ensure adherence to protocol and appropriate administration of study product
Study and Source Documentation Review

• AE, SAE, and Protocol Deviation Review
  • Documentation events and deviations
  • Proper reporting of events and deviations to the appropriate parties
  • Review of source documents for unreported events and deviations

• Unresolved Issues
  • From previous monitoring visits
  • Missing forms, queries, or other outstanding data issues
Summary Meeting

- At a minimum, the Investigator and Coordinator should be present
- Summary of findings
- Plan for issue resolution (current and unresolved)
FDA Inspection Findings

- Common Deficiencies
  - Informed Consent
  - Adherence to Protocol
  - Drug Accountability
  - Inadequate Records
  - Inadequate IRB Interaction
Preparation for a Site Visit

- Preparation begins before the study starts
- Be familiar with Good Clinical Practice (GCP), the protocol, the informed consent form, the Investigator’s Brochure, and all other study-related materials
Preparation for a Site Visit

- Establish method for storing and organizing study files
  - Subject records
  - Study product records
  - Regulatory files
- Ensure complete, thorough, and accurate documentation throughout the course of the study
- Establish internal quality assurance procedures
Preparation for a Site Visit

- Ensure continued oversight and communication
- Resolve all issues from previous visits
- Have all study files and documentation available during visit
- Don’t be nervous!
  - Visits are a learning opportunity for site study staff and for monitors
Questions?