

Site Monitoring Visits: What to Expect and How to Prepare

Colleen Allen, CCRA

The EMMES Corporation

**American Society of Cell and
Gene Therapy**

Clinical Trials Training Course

May 17-18, 2010

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



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?

