Status **Active** PolicyStat ID **15202334**

Effective	02/2024
Next Review	02/2027

Sponsor	Nora Olsen: CR Reg Affairs&Compliance Dir.
Area	Cancer Consortium - Institutional
Applicability	FHCC Institutional Policies
References	Org Wide/ Institutional

FDA Inspections/Sponsor Audits: Notification Process

SCOPE:

This policy applies to all Fred Hutchinson Cancer Center (Fred Hutch), University of Washington (UW), and Seattle Children's (SC) workforce members supporting Cancer Consortium clinical research activities who may receive notification of an impending FDA inspection and/or sponsor audit of a Cancer Consortium clinical trial.

This policy does not apply to audits or inspections of Institutional Review Boards (IRBs) or manufacturing facilities.

PURPOSE:

This policy describes notification steps to be taken by study teams upon learning of a Food and Drug Administration (FDA) inspection or Sponsor audit of a Cancer Consortium clinical trial. Regulatory authorities and investigational new drug (IND) sponsors have the authority to perform in-depth review of the conduct of clinical trials under their jurisdiction. Such reviews may include FDA or sponsor assessment of institutional policies, procedures, and facilities, and may therefore have potential impact for the entire institution or Cancer Consortium.

DEFINITIONS:

- **Audit**: The act of evaluating trial conduct and compliance with the protocol, standard operating procedures (SOPs), Good Clinical Practice (GCP), and the applicable regulatory requirements.
- **BIMO**: FDA's Bioresearch Monitoring Program. The objectives of the FDA's BIMO Program are: (1) To protect the rights, safety, and welfare of subjects involved in FDA-regulated clinical trials; (2) To verify the accuracy and reliability of clinical trial data submitted to FDA in support of research or marketing applications; and (3) To assess compliance with FDA's regulations governing the conduct of clinical trials.
- **Cancer Consortium:** An NCI-designated Comprehensive Cancer Center that comprises Fred Hutchinson Cancer Center (Fred Hutch), University of Washington (UW), and Seattle Children's (SC).
- **Cancer-related Study:** A study that meets one or more of the following characteristics:
    - Funded by NCI; or
    - Primary site of a multi-site trial has classified the study as cancer or cancer-related; or
    - The trial cohort will include both patients with a cancer diagnosis and others without a cancer diagnosis AND includes a primary or secondary analysis of the portion of the cohort with a cancer diagnosis; or
    - Research of secondary conditions related to cancer treatment in patients with a cancer diagnosis who have received that treatment; or
    - Cancer prevention studies that specifically include a primary outcome of cancer diagnosis; or
    - BMT not related to cancer treatment.
- **Code of Federal Regulations (CFR):** The Code of Federal Regulations (CFR) annual edition is the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the [United States] Federal Government.
- **FDA Investigator** (or field investigator): FDA Consumer Safety Officer or other representative from FDA district office who conducts a BIMO inspection at a Clinical Investigator or Sponsor-Investigator site.
- **For-cause inspection**: An inspection initiated by FDA at a clinical trial site in response to concerning reports or events associated with that site. Examples include unusually high numbers of significant protocol deviations; patterns of serious adverse events that are more frequent, severe, or otherwise inconsistent with use of the investigational product at other sites; or complaints received by FDA from study participants, the sponsor, an IRB, or others. The focus of a for-cause inspection is the conduct of the study by the specific Clinical Investigator or Sponsor-Investigator.
- **Investigator** (or *Clinical Investigator*): A person responsible for the conduct of the clinical trial at a trial site. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the study team and may be called the ***Principal Investigator***.
- **Routine inspection:** An inspection initiated by FDA at a clinical trial site for standard review or oversight purposes. These are frequently "pre-approval" inspections conducted during FDA

review of a marketing application for a drug, biologic, or device product, which focus on the conduct of the study and reporting of data by a specific Clinical Investigator who conducted a registrational trial. Sponsor-Investigators are also subject to routine inspections to assess study conduct and to assess whether all sponsor obligations are being adequately met.

- **Sponsor-Investigator**: An individual who both initiates and conducts, alone or with others, a clinical trial, and under whose immediate direction the investigational product is administered to, dispensed to, or used by a subject. The term does not include any person other than an individual (e.g., it does not include a corporation or an agency). The obligations of a sponsor-investigator include both those of a sponsor and those of an investigator.

POLICY:

Procedure FOR AN FDA INSPECTION

All relevant institutional Standard Operating Procedures (SOPs) should be followed during the conduct of the inspection or audit itself.

Routine FDA site inspections are typically pre-announced by the FDA investigator approximately five days in advance.

For-cause FDA inspections may be announced with shorter notice or may not be pre-announced (i.e., FDA investigator contacts the Principal Investigator (PI), Sponsor-Investigator, or other institutional representative upon arrival at the site).

The FDA or sponsor usually contacts the PI or study team directly regarding an impending FDA inspection or study audit. The person who is contacted should obtain the following information from the FDA investigator at initial contact:

- FDA investigator's name, phone number, email address
- The name of the PI or Sponsor-Investigator and the study to be inspected
- Inspection start date (if unconfirmed, the date proposed by FDA investigator)
- Number of FDA investigators conducting inspection
- Purpose and anticipated length of the inspection, if provided by the FDA investigator
- Specific subject records to be reviewed, if requested by the FDA investigator
- Specific documents to be copied in advance, if requested by the FDA investigator

Announcement of an FDA inspection must be emailed immediately after initial notification to the following:

- For all Cancer Consortium clinical trials:
    - PI (also notify by phone)
    - Research Manager or equivalent (also notify by phone)
    - Fred Hutch Clinical Research Support (CRS) (RegulatoryAffairs@fredhutch.org);
        - Also notify by phone *if* PI's primary appointment is with Fred Hutch or UW.

- The Independent/Institutional Review Board (IRB) of record.

- For a Cancer Consortium clinical trial conducted at FH South Lake Union:
  - Fred Hutch Office of General Counsel (OGC)
    - Also notify by phone *if* PI's primary appointment is with Fred Hutch.
  - Fred Hutch CRS Director, Regulatory Affairs and Compliance

- For a Cancer Consortium clinical trial conducted at SC:
  - SC Research Compliance & Regulatory Affairs (RCRA) (ResearchCompliance@SeattleChildrens.org)
    - Also notify by phone *if* PI's primary appointment is with SC.
  - SC Senior Director, Research Compliance & Regulatory Affairs
  - SC Legal
    - Also notify by phone *if* PI's primary appointment is with SC.

Institutional support of FDA inspections

- CRS will provide support for FDA inspections related to Cancer Consortium clinical trials conducted primarily at Fred Hutch South Lake Union, including providing additional institutional notifications per internal policies and procedures.
- RCRA will provide support for FDA inspections related to Cancer Consortium clinical trials conducted primarily at SC, including providing additional institutional notifications per internal policies and procedures.

Procedure FOR A SPONSOR AUDIT

Sponsor audits are arranged by the Study Team and Sponsor/Contract Research Organization (CRO) at a mutually agreed upon time, typically weeks in advance.

The Study Team member should obtain the following information from the auditor:

- Auditor's name, company name, phone number, email address
- The study to be audited
- Audit start date
- Purpose, location (remote or on-site), and anticipated length of the audit
- Departments included in the audit, such as Investigational Drug Services (IDS) Pharmacies, specimen processing, or manufacturing.
- Specific subject records to be reviewed, if requested by the auditor
- Specific documents to be provided in advance, if requested by the auditor.

Announcement of a Sponsor audit, including the information gathered above, must be emailed after initial notification to the following:

- For all Cancer Consortium clinical trials:

    - PI
    - Research Manager or equivalent
    - Fred Hutch Clinical Research Support (CRS) (RegulatoryAffairs@fredhutch.org);
    - Fred Hutch, UW, or SC IDS Pharmacies (as applicable)
    - Director of any Fred Hutch, UW, or SC manufacturing facility used in preparation of the investigational product, (as applicable).
- For a Cancer Consortium clinical trial conducted at SC:
    - SC Research Compliance & Regulatory Affairs (RCRA) (ResearchCompliance@SeattleChildrens.org)
    - SC Senior Director, Research Compliance & Regulatory Affairs

REQUIREMENTS:

REFERENCES:

- *21 CFR Part 56*
- *21 CFR Part 312*
- *21 CFR Part 812*
- *FDA Compliance Program 7348.811: Chapter 48 – Bioresearch Monitoring. Subject: Clinical Investigators and Sponsor-Investigators. Implementation Date: 07/22/2020*

Approval Signatures

Step Description	Approver	Date
	Natalie Simpson: Policy & Practices Mgr	02/2024
	Kristi Stiffler: Vice President, Clinical Research	02/2024
	Nora Olsen: CR Reg Affairs&Compliance Dir.	02/2024

Applicability

FHCC Institutional Policies