



# International Clinical Trials: GCP Perspective

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# Disclaimer

The Views expressed in this presentation are those of the speaker and not necessarily those of the Food and Drug Administration



## Objectives



To share information about international clinical trials from GCP perspective

To provide you information on how to comply with FDA's regulatory requirements for international clinical trials

# Introduction to International Clinical Trials

- Clinical trials are increasingly global
- They are conducted under a variety of scenarios
- Some trials may be based solely on foreign clinical data



# Relevant FDA Regulations

- 21 C.F.R. Part 312: Investigational New Drug (IND) Application
- 21 C.F.R. Part 312.120 : Foreign clinical studies not conducted under an IND
- 21 C.F.R. Part 314 - Applications for FDA approval to market a new drug
- 21 C.F.R. Part 50: Protection of Human Subjects
- 21 C.F.R. Part 54: Financial Disclosure by Clinical Investigators
- 21 C.F.R. Part 56: Institutional Review Boards
- 21 C.F.R. Part 11: Electronic Records, Electronic Signatures



# Conducting Clinical Trials Outside United States

- IND is not required
- If a clinical trial is conducted under an IND, IND requirements must be met unless waived
- If a clinical trial is not conducted under IND, the sponsor must ensure that the trial complies with the requirements in 21 CFR 312.120



# Non-IND Studies Outside the United States



1. Must conduct the study in accordance with good clinical practice (GCP)
2. FDA should be able to validate the data from the study through an onsite inspection, if necessary



# Clinical Trial Requirements in the United States

- In the United states investigators are required to submit an IND to FDA if they intend to conduct a clinical investigation unless studies meet specific regulatory exemption criteria.
- When a clinical study is conducted under an IND, all FDA IND requirements (21CFR 312) must be met unless waived.



# Investigator Responsibilities for IND Studies

1. Ensuring that an investigation is conducted according to the signed investigator statement (FDA Form 1572), the **investigational plan, and applicable regulations**
2. Ensuring **control of drugs** under investigation; including **storage** of the investigational drug
3. Maintaining **adequate records** of the disposition of the drug, **accurate case histories**
4. Ensuring record **keeping and retention**
5. Providing **investigator reports**: progress reports, safety reports, final
6. Ensuring **IRB review**, approval and reporting requirements
7. Ensuring **FDA has access** to inspect investigator's records and reports.
8. Ensuring the **protection of the rights, safety, and welfare** of subjects
9. Ensuring that **informed consent** is adequately obtained
10. Providing **financial disclosure** to sponsor

The investigator responsibilities are covered under Part 312.60 to 312.70 Investigational New Drug Application Regulations

# Exemptions from IND Requirements

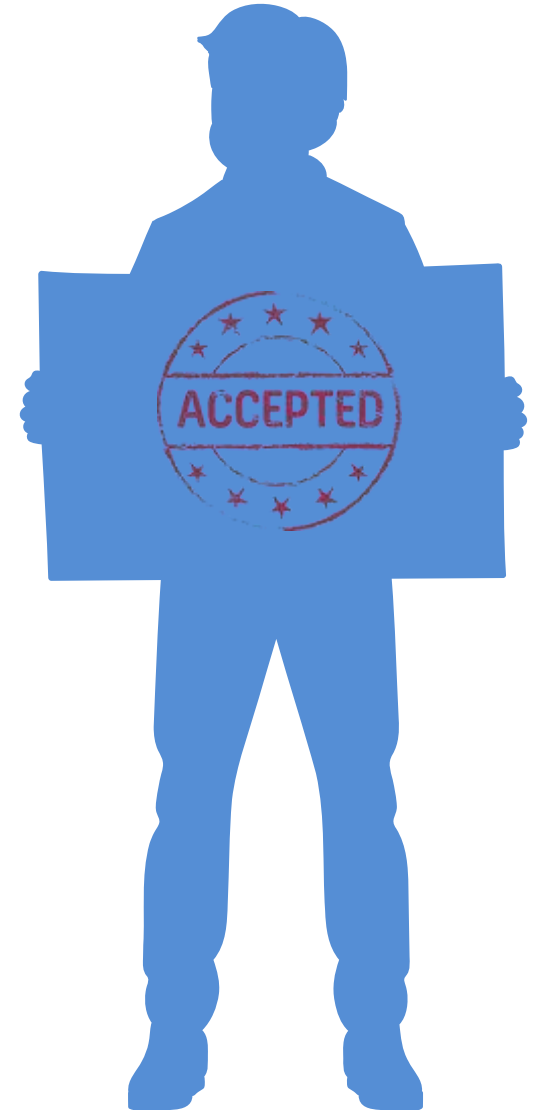
Exemption from IND will be granted if **all of** the following requirements are met:

1. The drug product for the planned investigation is lawfully marketed in the U.S.
2. The planned investigation is not intended to support new indication/or significant change in labeling
3. The planned investigation does not involve a route of administration or dosage level or use in a patient population or other factor that significantly increases risk
4. The investigation is conducted in compliance with part 56 (Institutional Review Board) and part 50 (Informed Consent) regulations
5. The investigation is conducted in compliance with 21 CFR 312.7 (promotion and commercial distribution of an investigational new drug) regulations

# Acceptance of Foreign Data from Non-IND Trials

**Foreign  
data  
should  
be:**

1. Applicable to the **U.S. population** and medical practice
2. Generated by **investigators** of recognized competence
3. Considered **valid** without an inspection
4. Validated through **inspection** when it deems necessary



[21 CFR 314.106.(b)]

# General Expectations During Inspection of Clinical Investigators

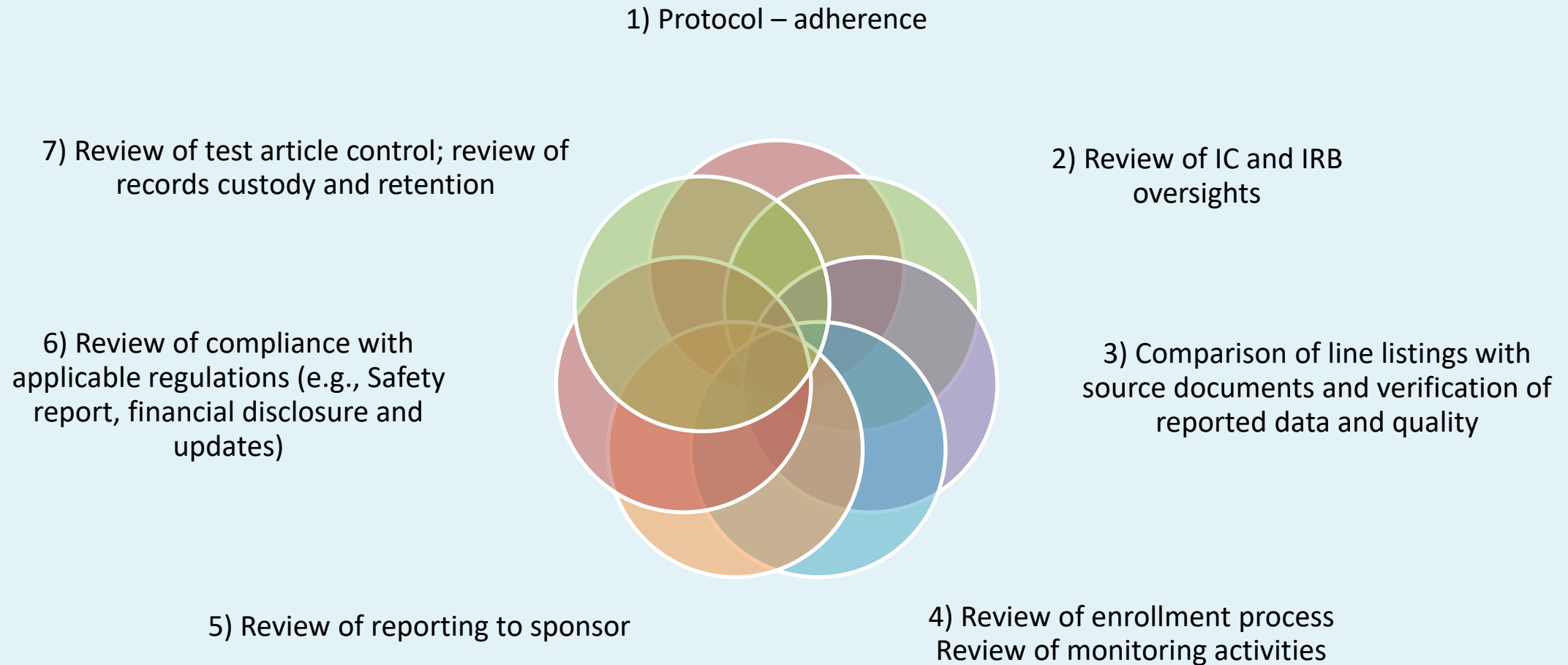


FDA regularly performs inspections of clinical investigators/ sites to ensure compliance with GCP and FDA's regulatory requirements

FDA investigators may inspect study binders, drug accountability records, consents, medical records, tests and procedures, case report forms, qualifications of investigator and study staff, and all other documents that relate to a study



# Inspection Areas of Focus



## **Take Home Point**

It is important to know FDA's regulatory requirements for international clinical trials are critical to reliably produce high quality data and not to jeopardize the rights, safety, or welfare of trial participants