

# FDA's Use of Alternative Approaches to Evaluate GCP Compliance

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# Learning Objectives



- Describe changes in the clinical trial ecosystem impacting FDA's approach to evaluating GCP compliance.
- Discuss FDA's revised draft guidance on Remote Regulatory Assessments.
- Describe FDA collaborations with Foreign Regulatory Counterparts.
- Describe FDA's approaches to evaluating GCP compliance in clinical trials with innovative design elements.

# Evaluating GCP Compliance: A History



## Inspections

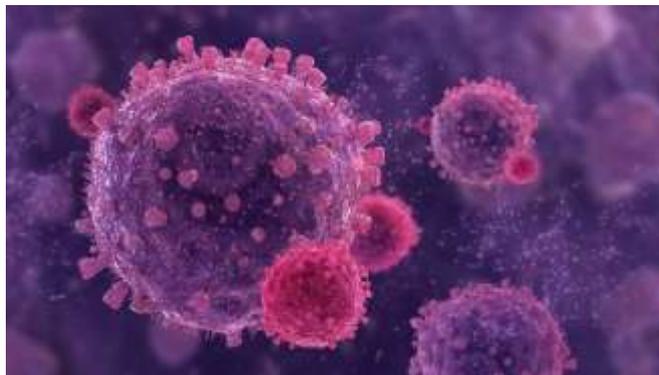
Investigations

Information Sharing



## Coverage of entire Compliance Program

# Evaluating GCP Compliance: Changes



# Remote Regulatory Assessments

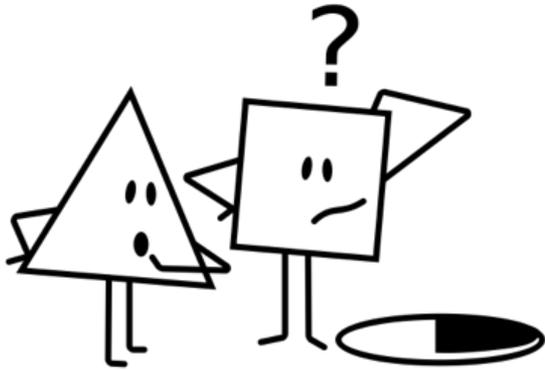
# Remote Regulatory Assessments



“An RRA is an examination of an FDA-regulated establishment and/or its records, conducted entirely remotely, to evaluate compliance with applicable FDA requirements. RRAs assist in protecting human and animal health, informing regulatory decisions, and verifying certain information submitted to the Agency.”

[Conducting Remote Regulatory Assessments Questions and Answers, Revised Draft Guidance \(Jan. 2024\)](#)

# RRAs are not . . .



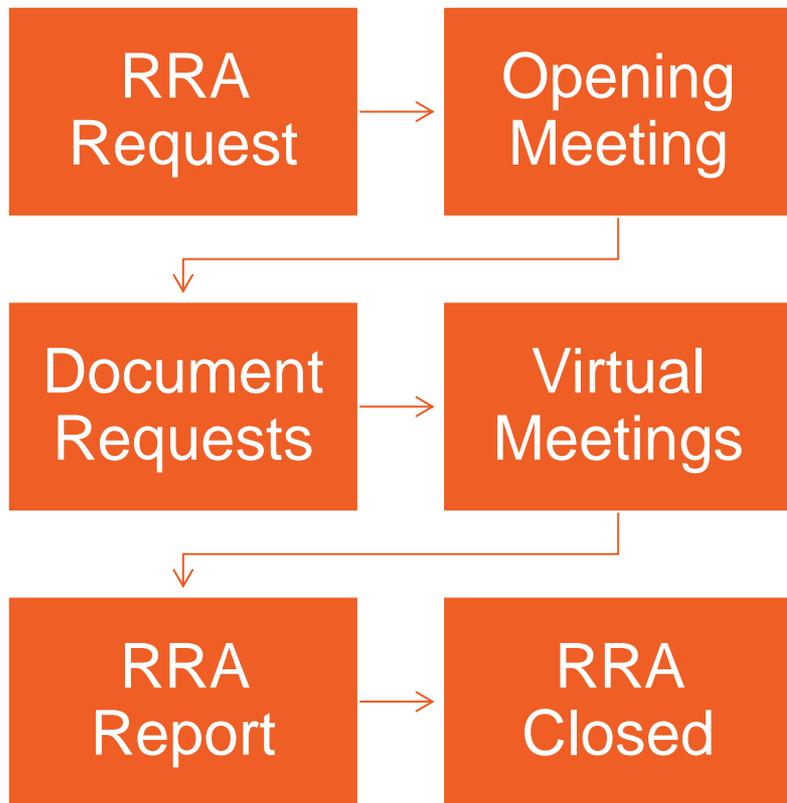
- Inspections
- Something you can ask for
- Intended to limit or replace other ways FDA gets information

Created by R Diepenheim  
from Noun Project

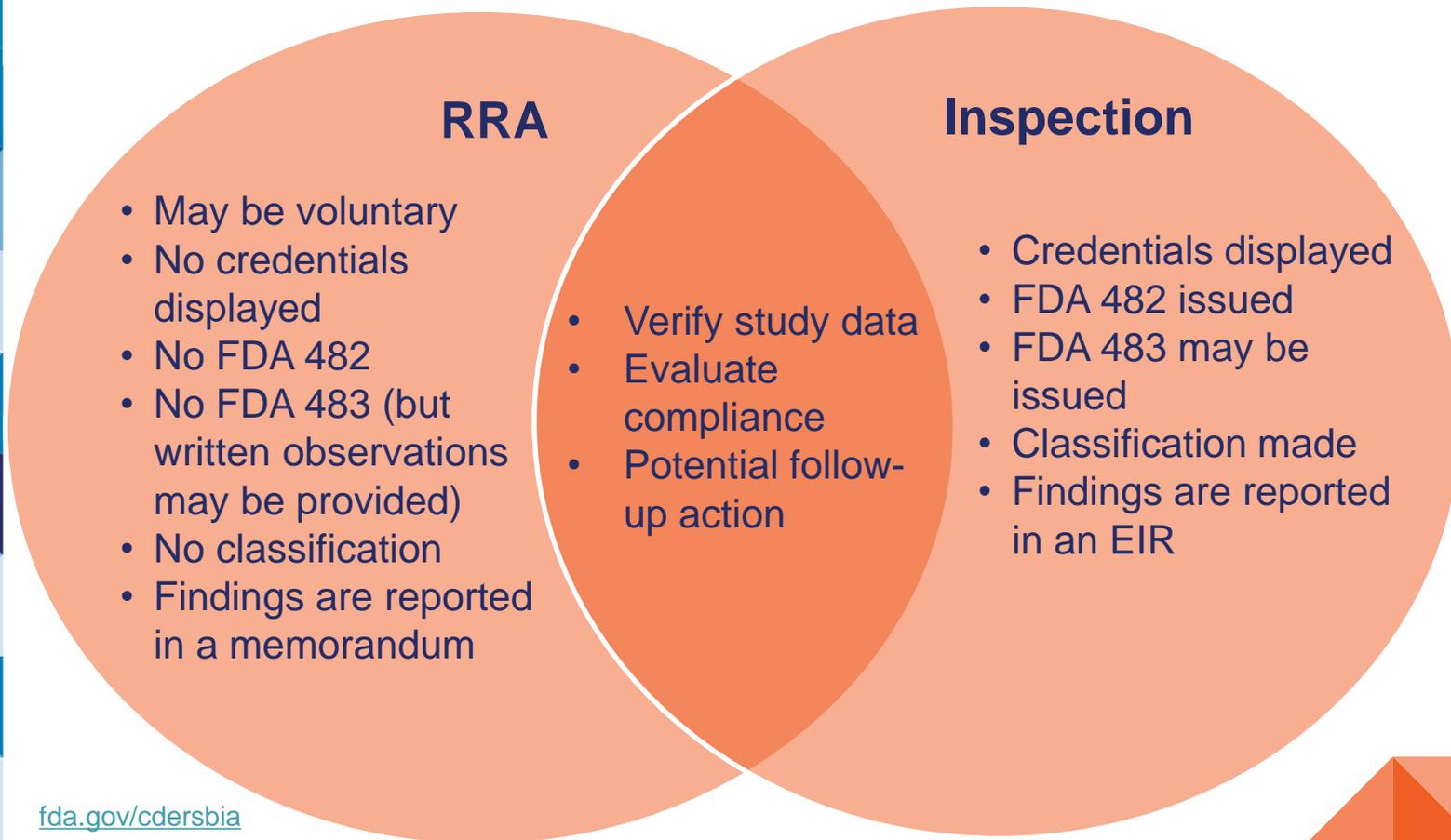
# Types of RRAs

- RRA describes a category of activities.
- RRAs may be mandatory or voluntary.
  - Mandatory RRAs are conducted under legal authority mandating participation.
  - Voluntary RRAs are not conducted under legal authority. FDA requests participation.
  - CDER clinical investigator RRAs typically are voluntary.

# RRA Process



# Comparing RRAs and Inspections



# How to Prepare for an RRA



1. Commit
2. Clarify
3. Organize
4. Staff
5. Connect



# Challenge Question #1



Which of the following is true for remote regulatory assessments:

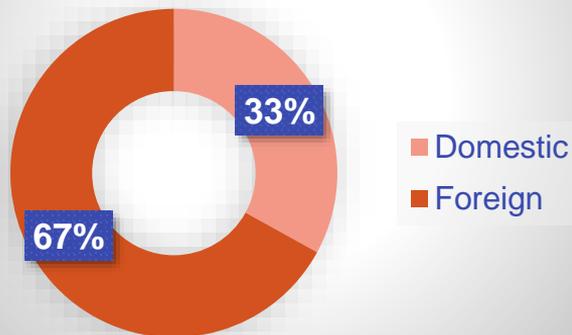
- A. Always mandatory.
- B. Begin with FDA presenting credentials and issuing an FDA 482.
- C. May involve interactive elements, such as screen sharing.
- D. May result in issuance of an FDA 483.

# Collaboration with Foreign Regulatory Counterparts

# Foreign Clinical Trials

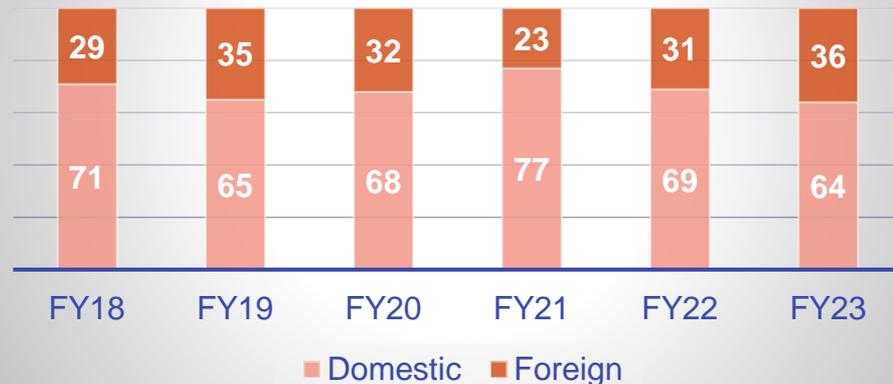


## LOCATION OF PARTICIPANTS\*



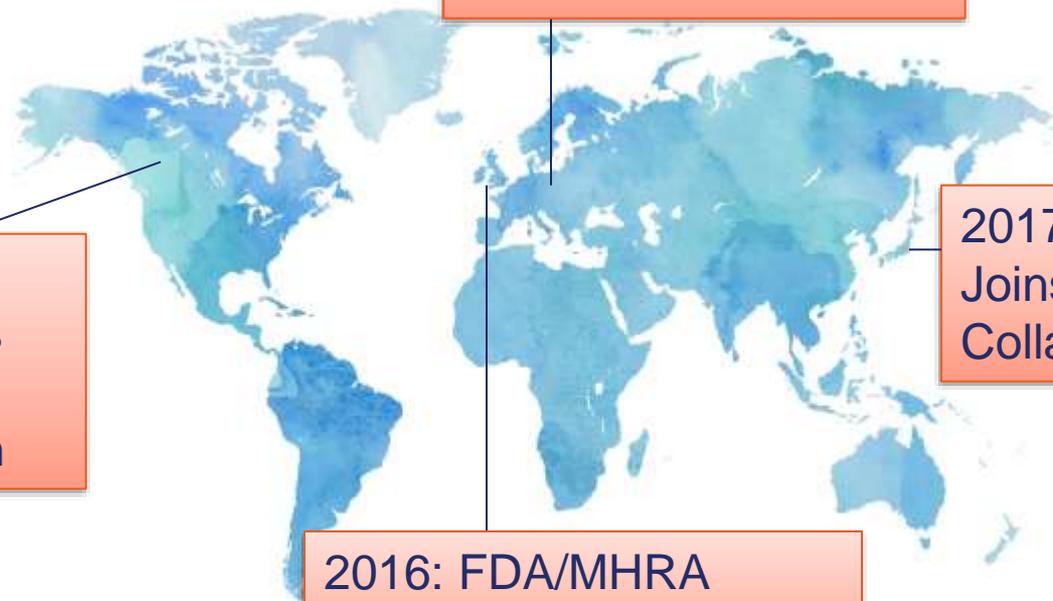
\*In clinical trials supporting 54 novel approvals in CY 2023. Based on 2023 Drug Trials Snapshots Summary Report.

## Location of Inspection Activity\*



\*Inspection activities in support of marketing applications issued by CDER/OSI. Based on Inspection Activity start data as a percentage. Data from FDA's Compliance Program Information System (Complis) database.

# International Collaboration



2009: FDA/EMA  
Collaboration

2017: PDMA  
Joins FDA/EMA  
Collaboration

2020: Health  
Canada joins  
FDA/MHRA  
Collaboration

2016: FDA/MHRA  
Collaboration

# International Collaboration



## Share:

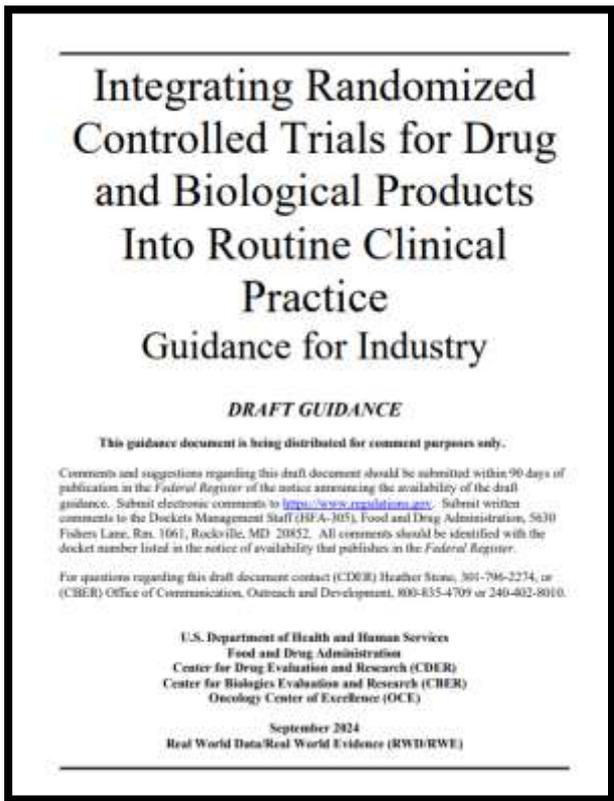
- inspection information (planning, outcomes)
- information about GCP-related legislation, guidance, and policy

**Conduct** collaborative inspections (observational and joint)



# Evaluation of GCP in Innovative Clinical Trials

# Innovating Approaches to Evaluation



“... **bioresearch monitoring inspections by FDA assess practices and procedures likely to have a meaningful impact on the reliability of the results and on the rights, safety, and well-being of participants.** Inspections also assess whether important protocol deviations occurred during a trial (e.g., failing to obtain informed consent, randomizing patients who did not meet enrollment criteria, failing to report important safety events) and any systemic or serious issues that occurred during the conduct of the trial.”

# Real-World Data & Real-World Evidence

## Real-World Data

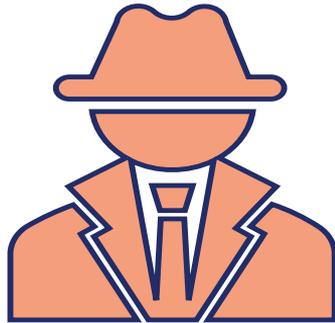
Data relating to patient health status and/or the delivery of health care routinely collected from a variety of sources

- 
- EHR Data
  - Claims Data
  - Registry Data
  - DHT Data

## Real-World Evidence

Clinical evidence about the usage and potential benefits or risks of a medical product derived from analysis of RWD

# Evaluating Trials Incorporating Real-World Evidence



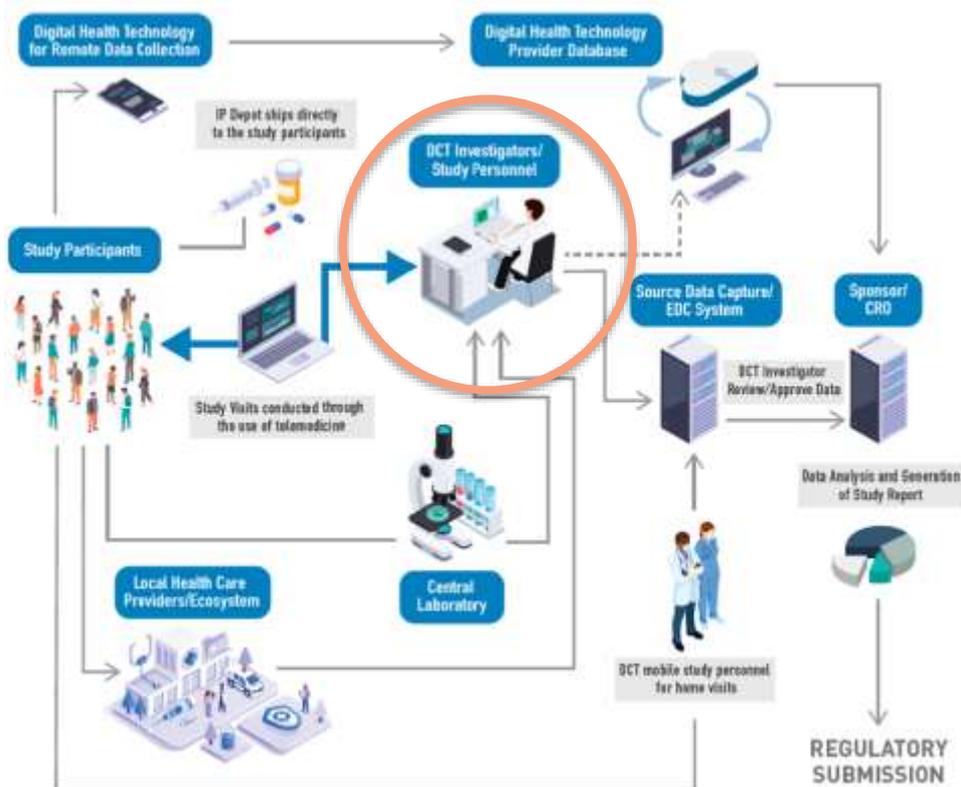
# Evaluating Trials Incorporating DHTs

- FDA does not intend to inspect individual DHTs for source data IF:
- Data captured by the DHT (including all metadata) ARE:
  - securely transferred to and retained in the durable electronic data repository
  - according to the sponsor's pre-specified plan
- FDA considers electronic data located in the first durable database to which the data are transferred to be source data



[FDA Guidance, Digital Health Technologies for Remote Data Acquisition in Clinical Investigations \(Dec. 2023\)](#)

# Evaluating Trials Incorporating Decentralized Elements



“For FDA inspections of clinical investigators, the investigator should identify a physical location where a responsible person is available to facilitate the FDA inspectors’ access to trial-related records (either paper or electronic access) for participants under the clinical investigator’s care and to facilitate interviews with trial personnel (either in person or remotely).”

[FDA Guidance, Conducting Clinical Trials with Decentralized Elements \(Sept. 2024\)](#)

# Challenge Question #2



Which of the following is not real-world data?

- A. Data collected in electronic health records during routine clinical care.
- B. Data collected by a study nurse during a study visit at the investigator's site.
- C. Data from insurance claims for healthcare provider services.
- D. Data from a disease-specific registry.

# Evaluating GCP Compliance: A Future



Range of well-defined, fit for purpose oversight options that can be deployed as appropriate



Flexible, efficient oversight that maximizes resources and robustly supports regulatory decision-making

