From: OC GCP Questions
To: [redacted]
Subject: Requirement for Trial Initiation Monitoring report
Date: Thursday, May 25, 2017 7:12:00 AM
Attachments: [redacted]

Good morning –

FDA regulations contain very general requirements with regard to monitoring. Both regulations governing the conduct of clinical trials in humans (21 CFR Parts 312 for drugs and biologics and 812 for devices) only specifically require that the sponsor select monitors qualified by training and experience and that they bring noncompliant investigators into compliance or terminate their participation in the trial. Monitoring specifics are often found in sponsor general and/or trial-specific standard operating procedures (SOPs), however, and FDA will look at these when a sponsor bioresearch monitoring (BIMO) is conducted. FDA does not have specific guidance - never mind requirements - as to how monitoring should be conducted. Therefore, the common idea of pre-study, initiation, and an adequate number of regular monitoring visits is not a requirement if the sponsor can exhibit that their monitoring was adequately and appropriately conducted.

An initiation report is not required by FDA regulation, though we would expect some information in the study file regarding site selection and study initiation to document the interaction between the study sponsor and the site. Regulations, however, only require a copy of a signed Form FDA 1572 (for drug and biologics studies) or a signed investigator agreement (for device studies).

The ICH guidance on good clinical practice (GCP) - ICH E6 - https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM073122.pdf is considered official FDA guidance but it is only guidance. I am not aware of any specific FDA guidance related to what is expected regarding the documents found in the tables in this document. If a BIMO inspection was conducted at a clinical site, the main documents reviewed are those related to regulatory requirements. (See www.fda.gov/ICECI/EnforcementActions/BioresearchMonitoring/ucm133562.htm for what is commonly reviewed during a BIMO clinical site inspection.) While review of documents related to monitoring can be included as part of a site level inspection, it is more commonly part of a sponsor inspection, as noted above, since the monitoring requirement is a sponsor responsibility. In any case, what was maintained at the site regarding the site initiation visit - merely documentation it occurred or an actual copy of the visit report - would not be a concern during an FDA inspection.

You may wish to review FDA's guidance document on A Risk-Based Approach to Monitoring https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM269919.pdf See page 19.

I hope this information is helpful.

Kind regards,

Doreen M. Kezer, MSN
Senior Health Policy Analyst
Office of Good Clinical Practice
Office of the Commissioner, FDA

From: [redacted]
Sent: Wednesday, May 24, 2017 10:50 PM
To: OC GCP Questions
Subject: Requirement for Trial Initiation Monitoring report

Good Afternoon,
As an auditor I have always required the site initiation report (in addition to the follow up letter) to be included in the site's study binder as it contains a very detail account of the visit not a general account as the follow up letter usually contains. Could you please give me your interpretation as to the ICH requirement for the trial initiation monitoring report being present in the site's study binder?
Thank you very much.

Regards,
[redacted]