

Office of Scientific Investigations & Office of Study Integrity and Surveillance



BIMO Metrics

[Updated: Mar 6, 2020]

Metrics Overview

- These slides provide annual inspection metrics for the compliance programs overseen by the Office of Scientific Investigations (OSI) and the Office of Study Integrity and Surveillance (OSIS) in FDA's Center for Drug Evaluation and Research (CDER). The vast majority of these inspections are conducted by FDA's Office of Regulatory Affairs (ORA).
- As FDA's approval decisions are based on a review of the data submitted by an applicant, it is essential to ensure the integrity of the data submitted and to verify that the rights, safety and welfare of those who participated in the studies were protected and that applicants continue to meet their obligations (e.g., for safety reporting) after approval. On-site inspection is one of many tools the FDA has for ensuring the integrity of data, the health and welfare of research participants, and the protection of public health.

CDER Bioresearch Monitoring Metrics Overview

- Data source:
 - Data obtained from FDA's Complis database and other sources as noted.
- Data conventions
 - Metrics are based on key events during the inspection process, including issuing an inspection assignment, starting an inspection, or issuing post-inspectional correspondence to the inspected party.
 - Differences in inspection counts when comparing data across varying sources (e.g. The Office of Regulatory Affairs' (ORA) eNspect & Field Accomplishment and Compliance Tracking System (FACTS) databases) may be the result of different tallying methods of inspection-related data.
- Changes from prior versions
 - Footnotes in individual slides indicate where significant changes from previous versions have occurred. These changes are due to refinements in data collection and associated processes.

For further information, please call 301-796-3150.

Metrics Terms

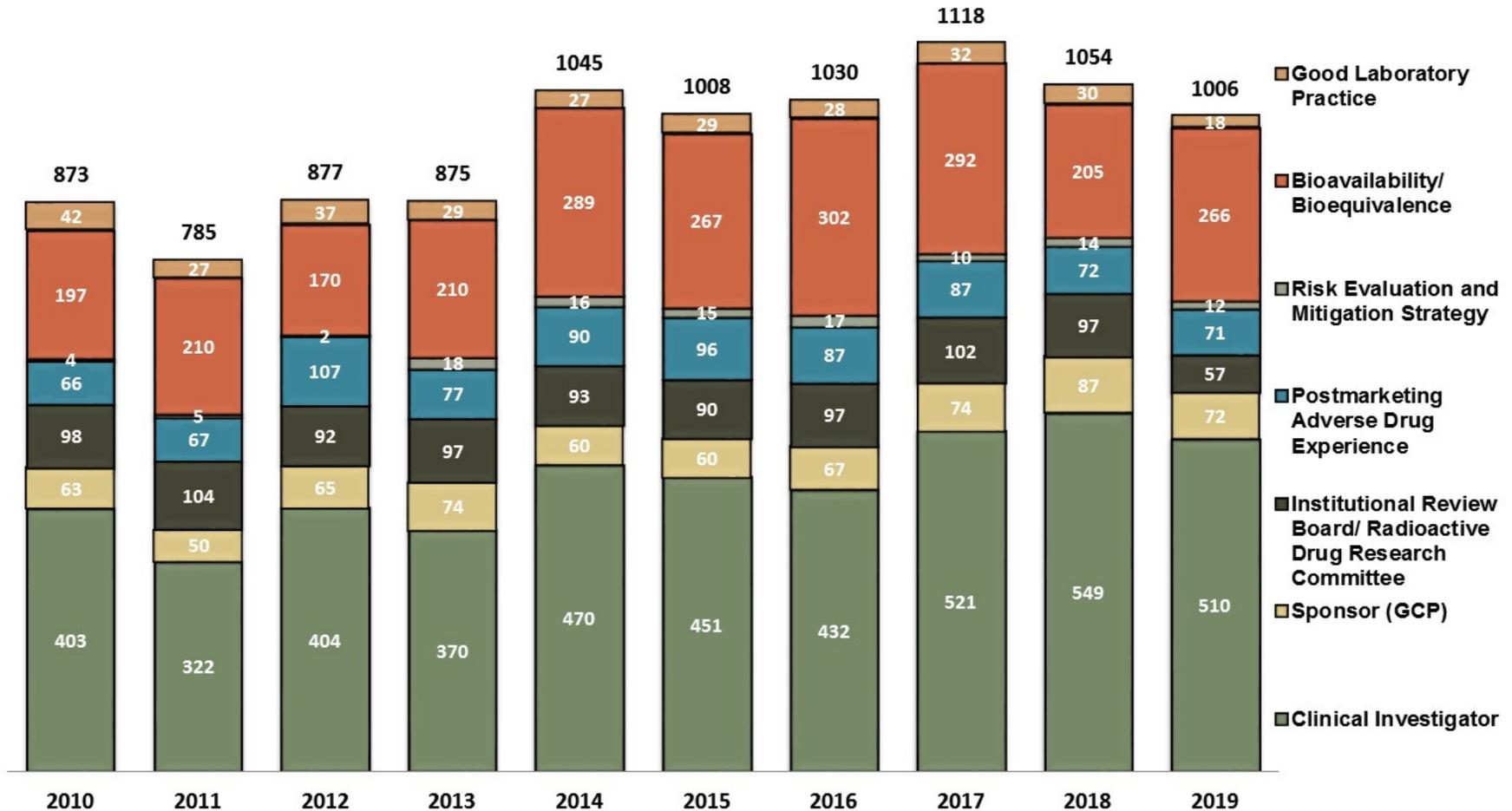
Organizations and Programs

- BA/BE: Bioavailability/Bioequivalence
- BE or BEQ: Bioequivalence
- BIMO: Bioresearch Monitoring
- CBER: Center for Biologics Evaluation and Research
- CDER: Center for Drug Evaluation and Research
- CDRH: Center for Devices and Radiological Health
- CI or Clin: Clinical Investigator
- CRO: Contract Research Organization
- GCP: Good Clinical Practice
- GLP: Good Laboratory Practice
- IRB: Institutional Review Board
- PADE: Postmarketing Adverse Drug Experience
- PMR: Postmarketing Requirements
- RDRC: Radioactive Drug Research Committee
- REMS: Risk Evaluation and Mitigation Strategy
- Sponsor: Sponsor or Sponsor-Investigator

Classifications

- CA-Restricted: Consent Agreement (Restricted Agreement)
- CA-Full DQ: Consent Agreement (Full Disqualification)
- DQ: Disqualification by Hearing or Commissioner
- NAI: No Action Indicated
- NIDPOE: Notice of Initiation of Disqualification Proceedings and Opportunity to Explain
- NOOH: Notice of Opportunity for Hearing
- OAI: Official Action Indicated
- VAI: Voluntary Action Indicated
- WL: Warning Letter

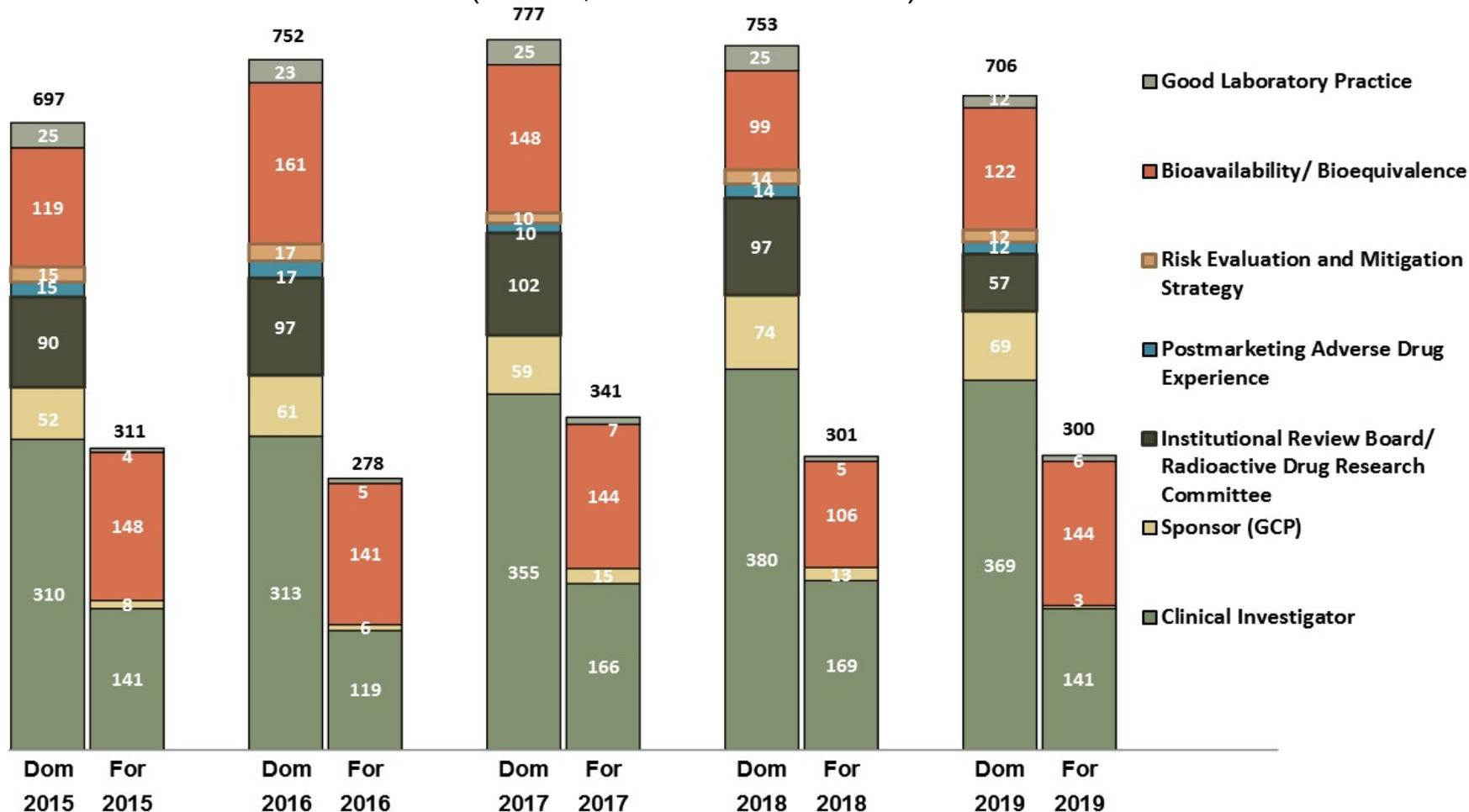
Inspections Overseen by OSI/OSIS*



* Based on inspection start date – [Complis database as of January 3, 2020]

- Sponsor (GCP) includes Sponsor/CRO/Sponsor-Investigator
- Many inspections may involve multiple applications and/or studies
- Good Laboratory Practice and Bioequivalence inspection programs operated by OSIS as of January 2015

Domestic vs. Foreign Inspections Overseen by OSI/OSIS* (CDER, FY 2015 - FY 2019)

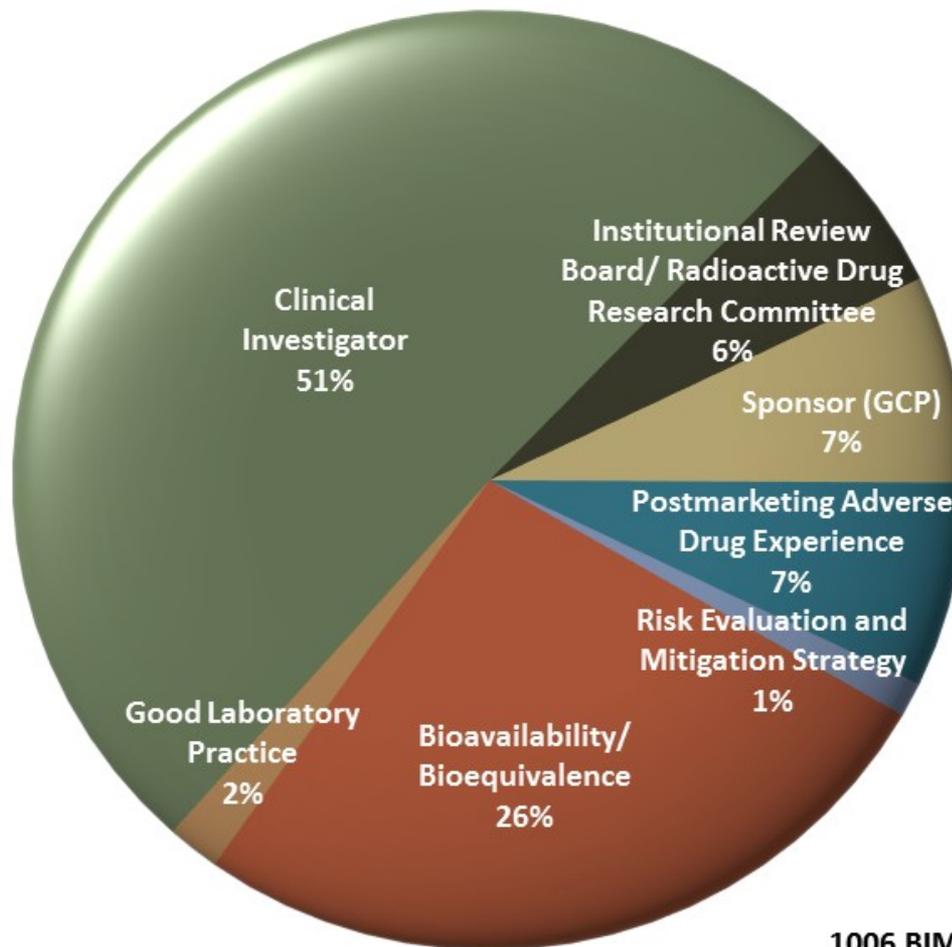


*Based on inspection start date – [Complis database as of January 3, 2020]

- Sponsor (GCP) includes Sponsor/CRO/Sponsor-Investigator
- Good Laboratory Practice and Bioequivalence inspection programs operated by OSIS as of January 2015

Bioresearch Monitoring Program Inspections*

(CDER, FY 2019)

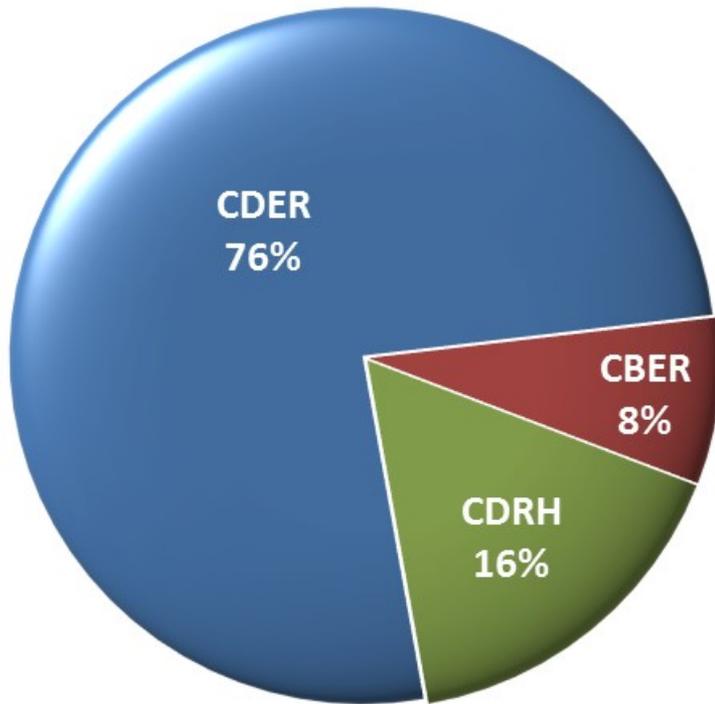


1006 BIMO Inspections

*Based on inspection start date – [Complis database as of January 3, 2020]

Clinical Investigator Inspections Classified*

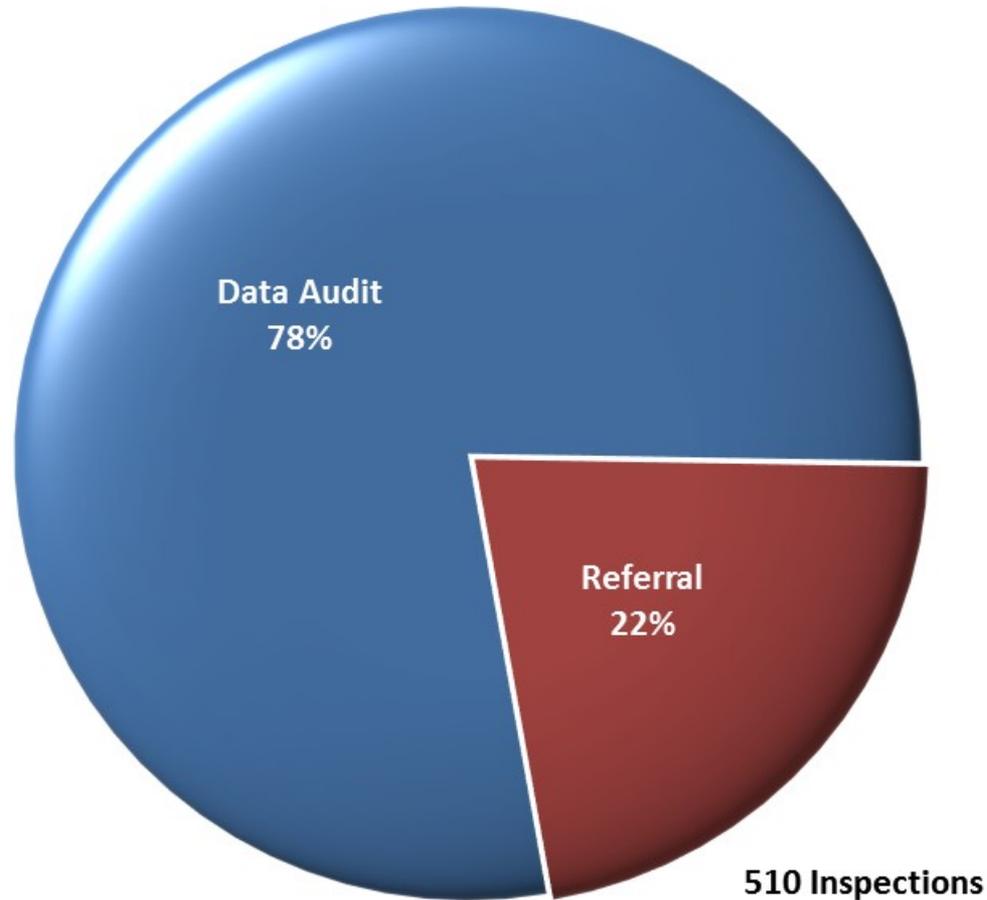
(All Centers, FY 2019)



CDER	570
CBER	58
CDRH	123
Total	751

* Center numbers based on number of classified inspections reported to BIMO Operations Steering Committee for FY19.
 • CDER: Center for Drug Evaluation and Research. CBER: Center for Biologics Evaluation and Research. CDRH: Center for Devices and Radiological Health.

Clinical Investigator: Data Audit versus Referral* (CDER, FY 2019)

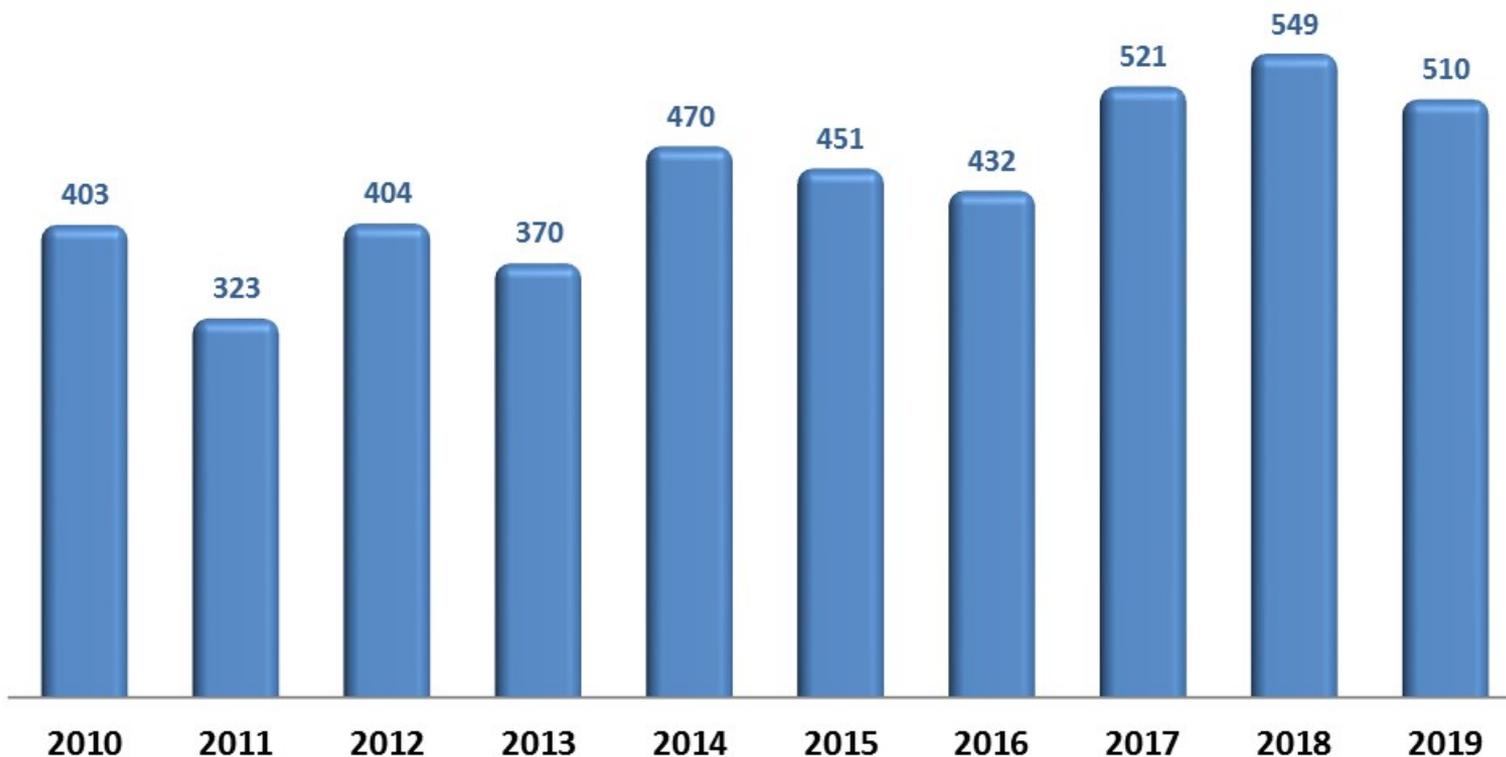


* Based on inspection start date – [Complis database as of January 3, 2020]

* Referrals include Complaints, Required Reports, IRB/Sponsor Notifications, and other referrals-internal and external.

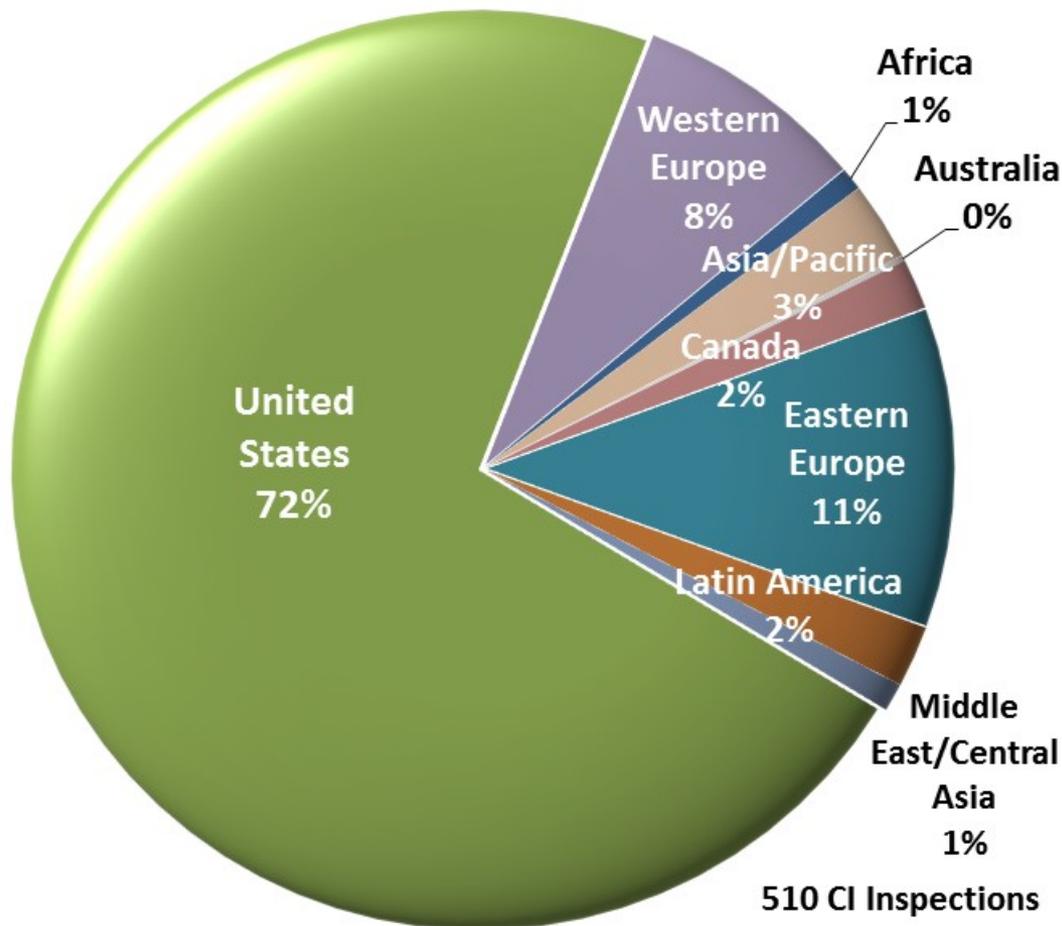
Clinical Investigator Inspections*

(CDER, FY 2010 – FY 2019)



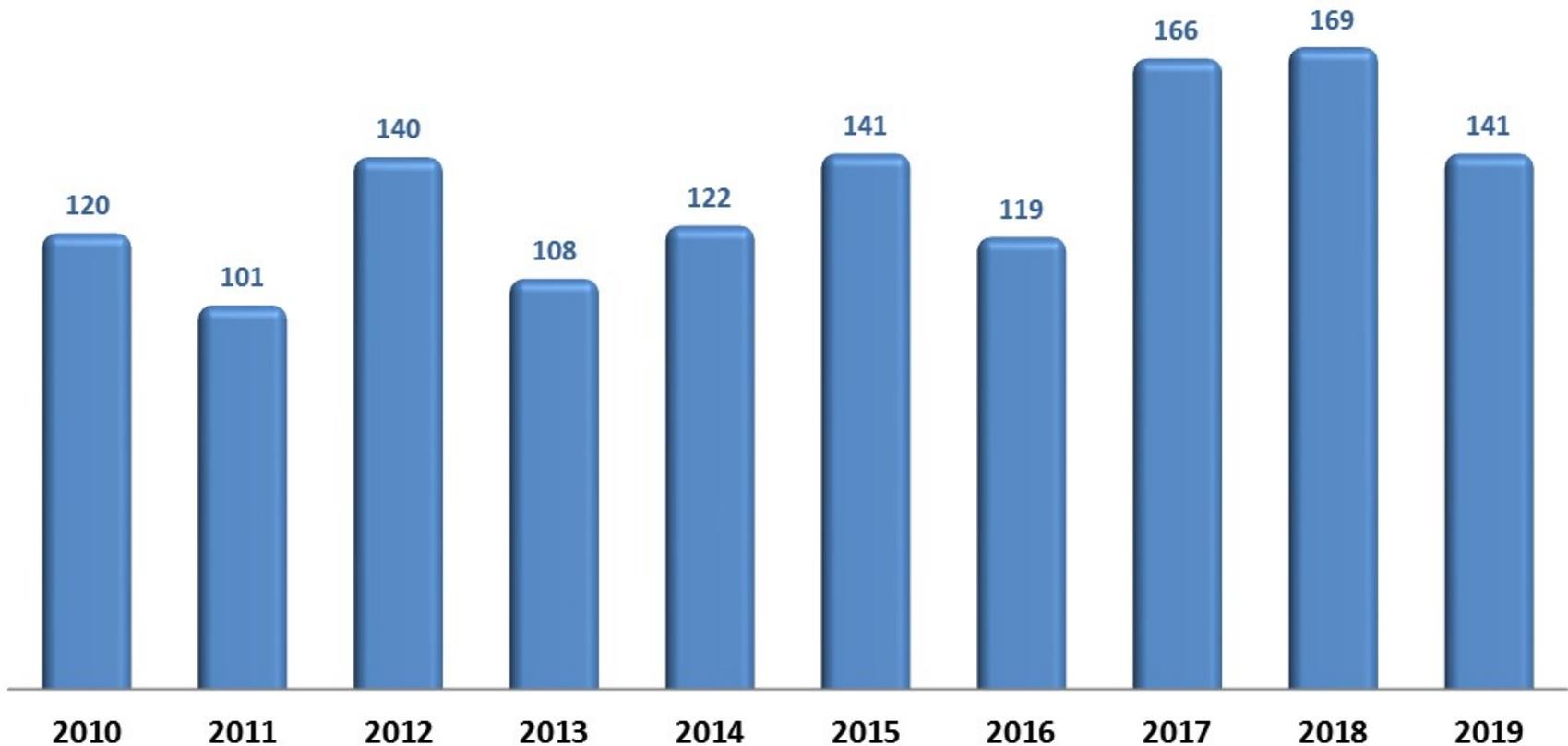
* Based on inspection start date – [Complis database as of January 3, 2020]

Clinical Investigator Inspections by Location* (CDER, FY 2019)



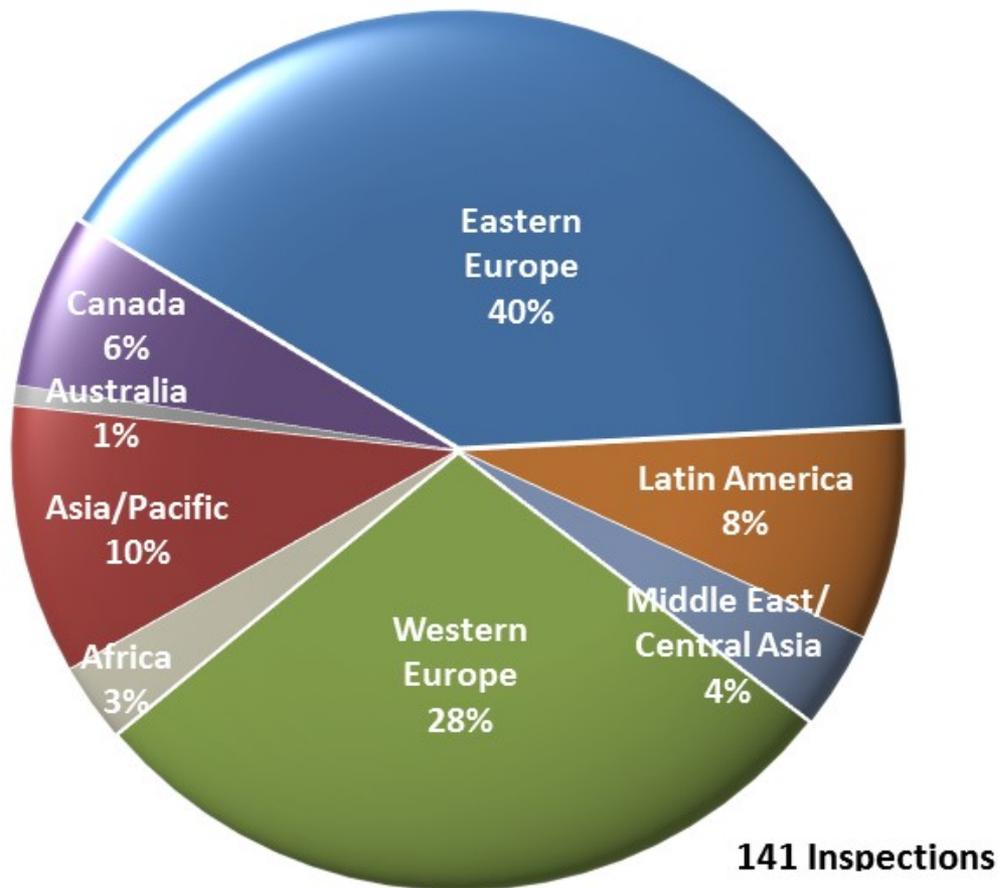
*Based on inspection start date – [Complis database as of January 3, 2020]

International Clinical Investigator Inspections* (CDER, FY 2010 - FY 2019)



*Based on inspection start date – [Complis database as of January 3, 2020]

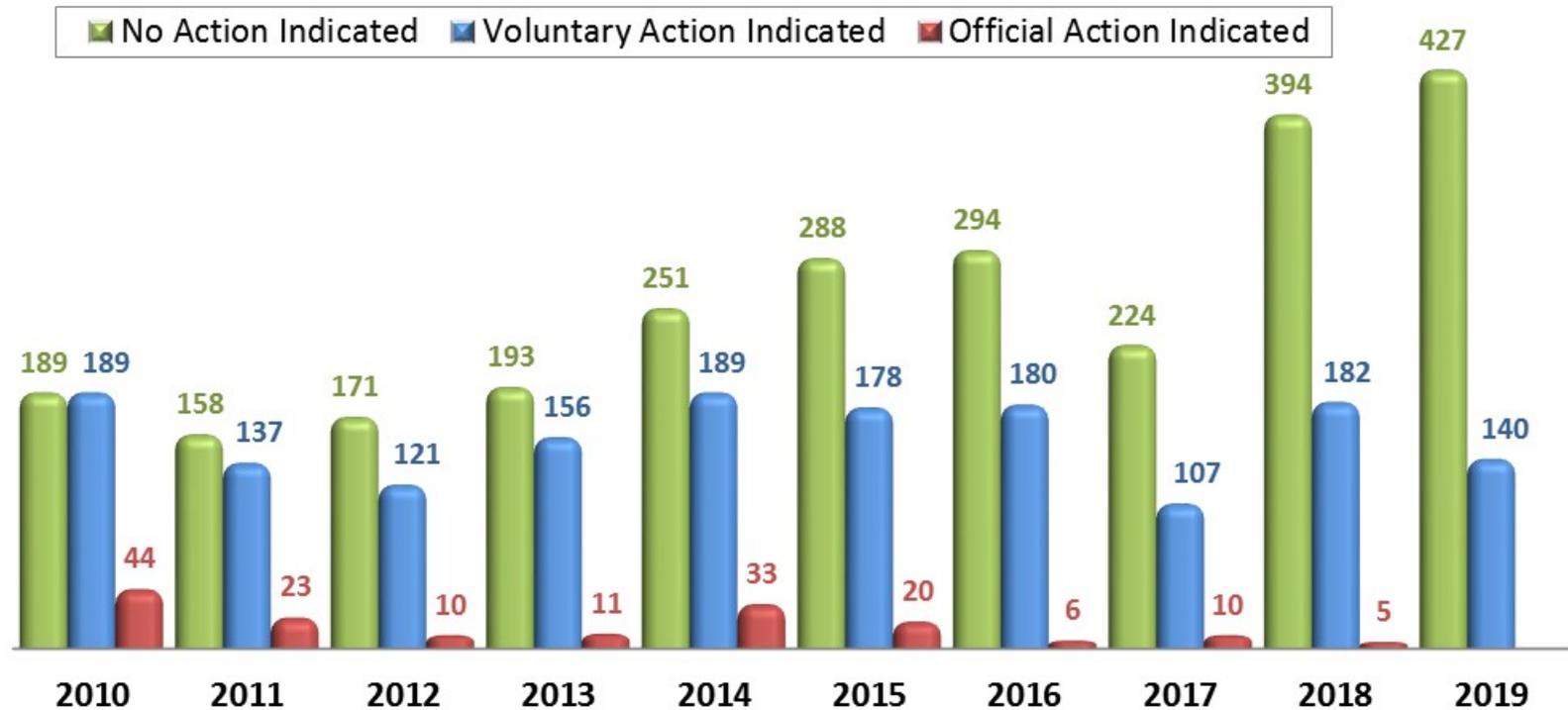
International Clinical Investigator Inspections by Location* (CDER, FY 2019)



*Based on inspection start date – [Complis database as of January 3, 2020]

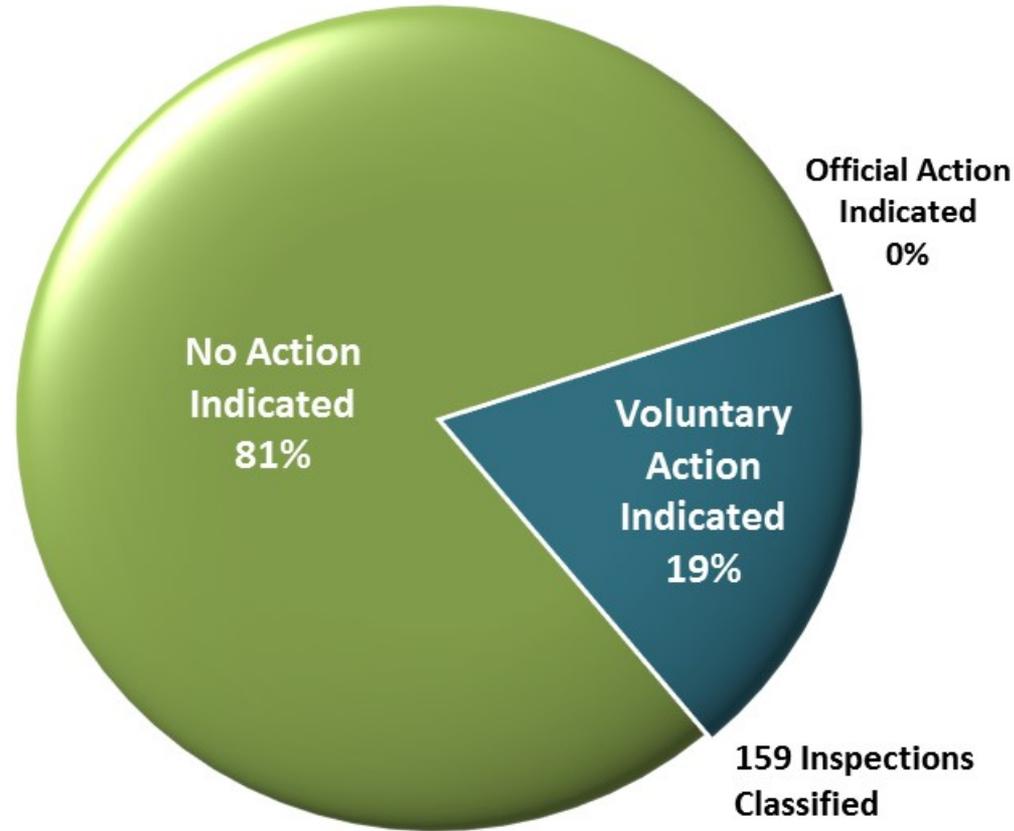
Clinical Investigator Inspections Final Classification*

(CDER, FY 2010 - 2019)



*Based on Letter Date and Final Classification; Includes OAI Untitled Letters, [Complis database as of January 3, 2020]

International Clinical Investigator Inspections Final Classification* (CDER, FY 2019)

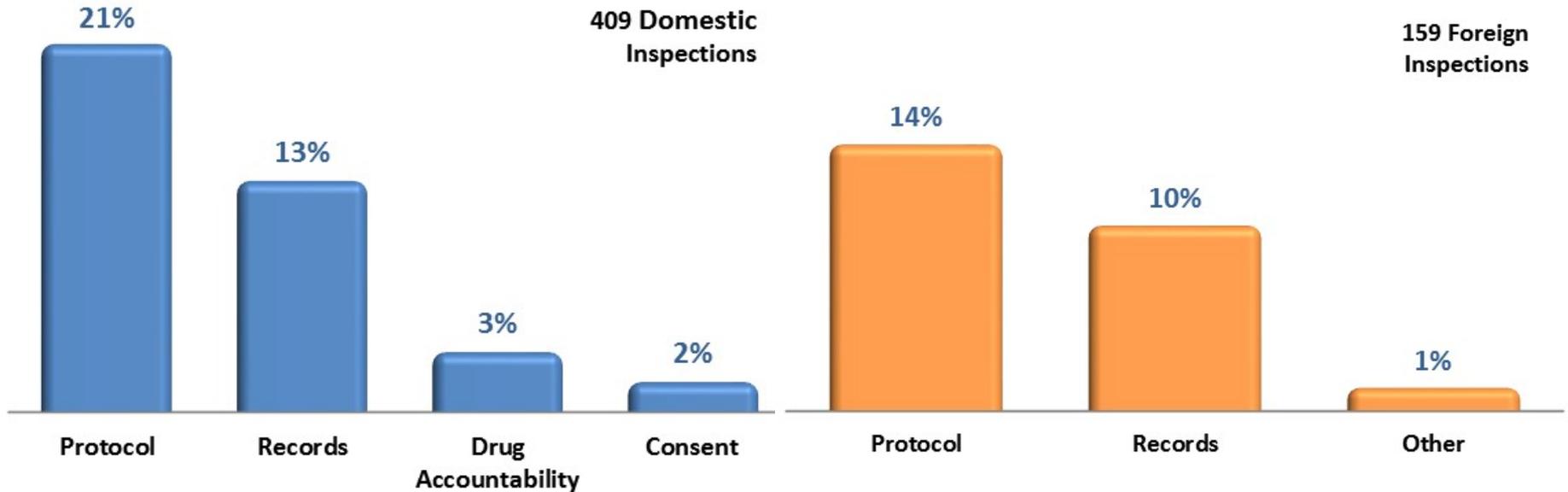


*Based on Letter Date; Includes OAI Untitled Letters, [Complis database as of January 3, 2020]

Frequency of Clinical Investigator Related Deficiencies Based on Post-Inspection Correspondence Issued* (CDER, FY 2019)

Domestic CI Deficiencies

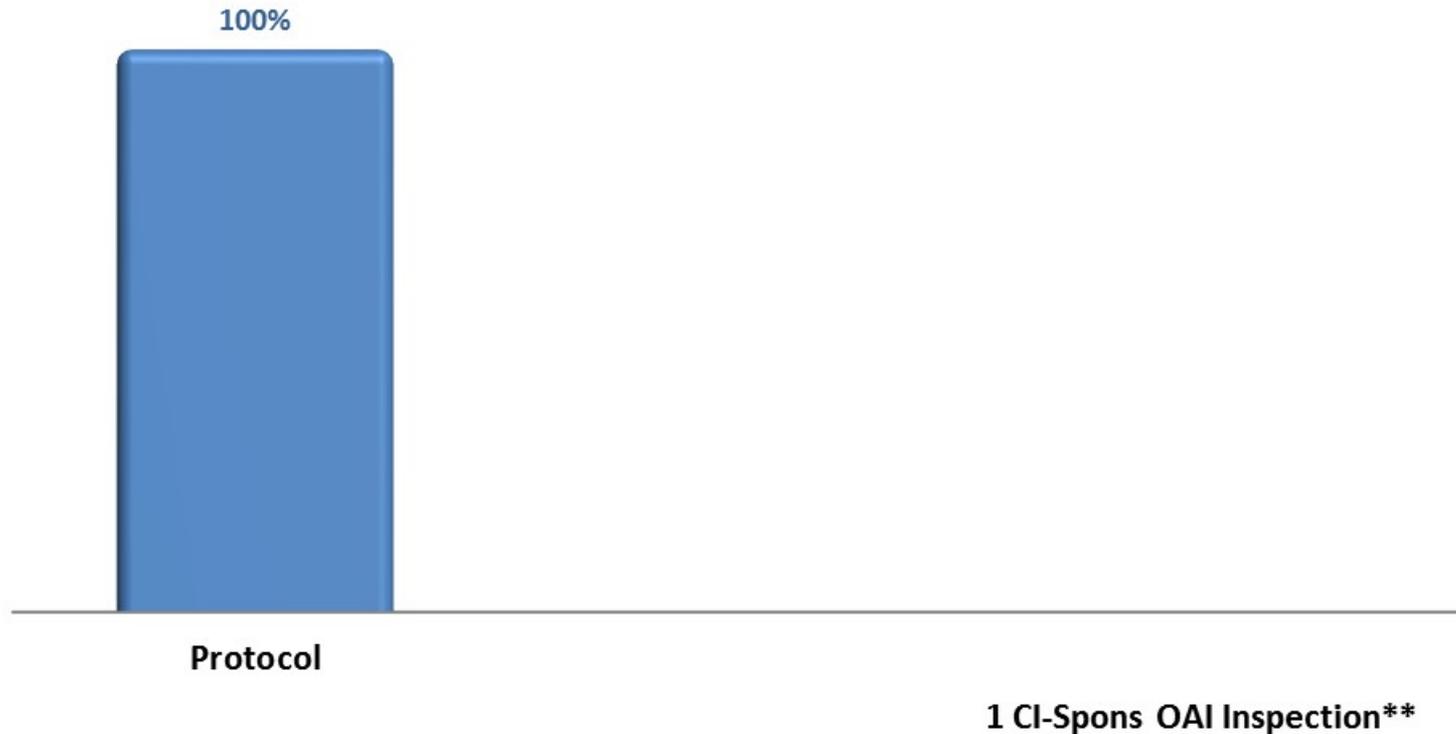
Foreign CI Deficiencies



*Based on LogOut Date and Classification. Inspections may have multiple deficiencies. Includes OAI untitled letters. [Complis database as of January 3, 2020]

Note: this does not denote number of inspections completed, but rather number of inspection reports evaluated and closed.

Frequency of Clinical Investigator Related Deficiencies Based on Post-Inspection Correspondence Issued Official Action Indicated (OAI) Final classification* (CDER, FY 2019)

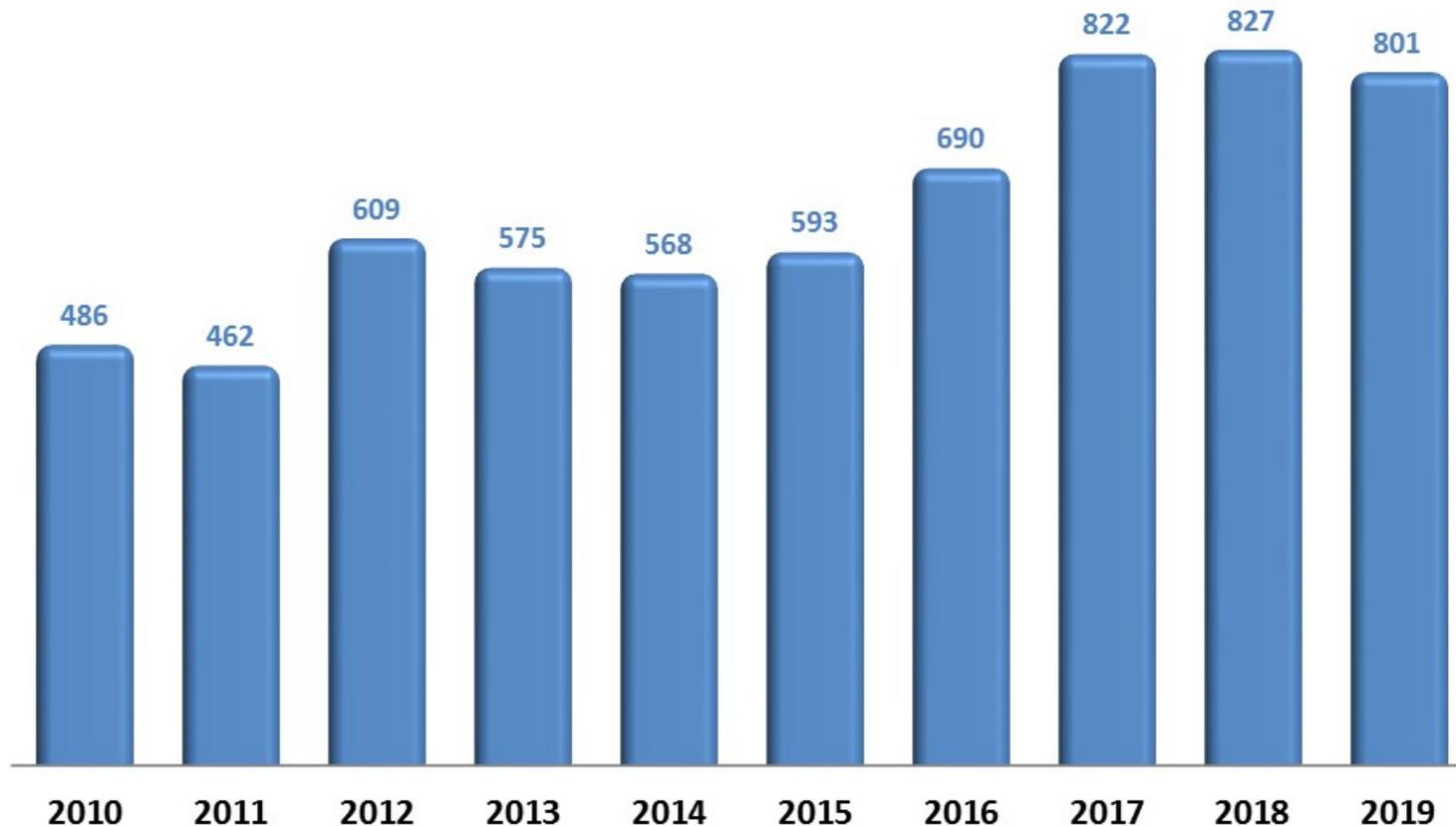


*Based on letter issue date. Inspections may have multiple deficiencies. Includes OAI untitled letters. [Complis database as of January 3, 2020]
Note: this represents the number of inspection reports evaluated and closed which differs from the number of inspections performed.

**This OAI classified as a Sponsor/Investigator (see slide 22), however, resulting warning letter was based partially on a investigator-related deficiency represented above.

Referrals Received by OSI*

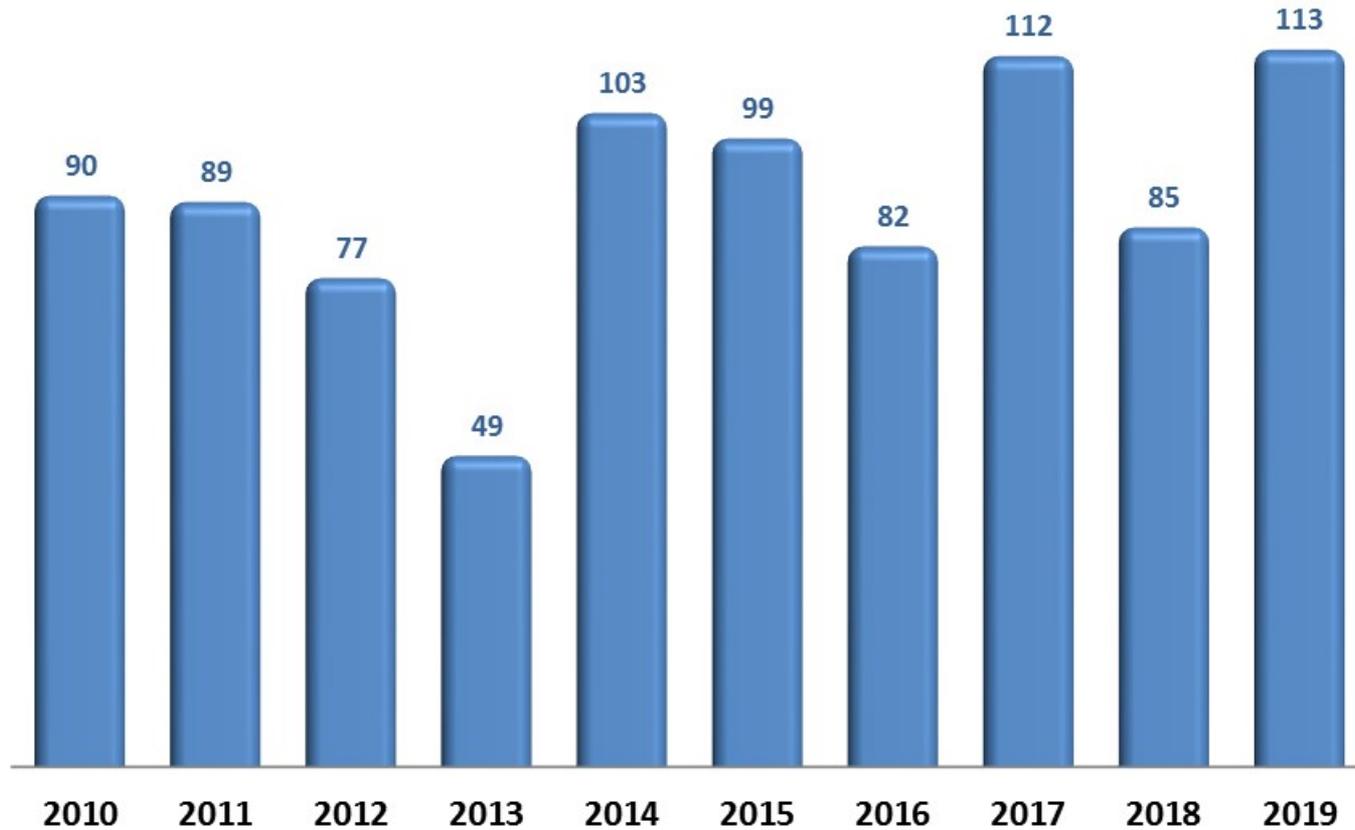
(CDER, FY 2009 - FY 2019)



* Referrals include Complaints, Required Reports, IRB/Sponsor Notifications, and other referrals-internal and external.
[Complis database as of January 3, 2020]

Referral-Related Clinical Investigator Inspections*

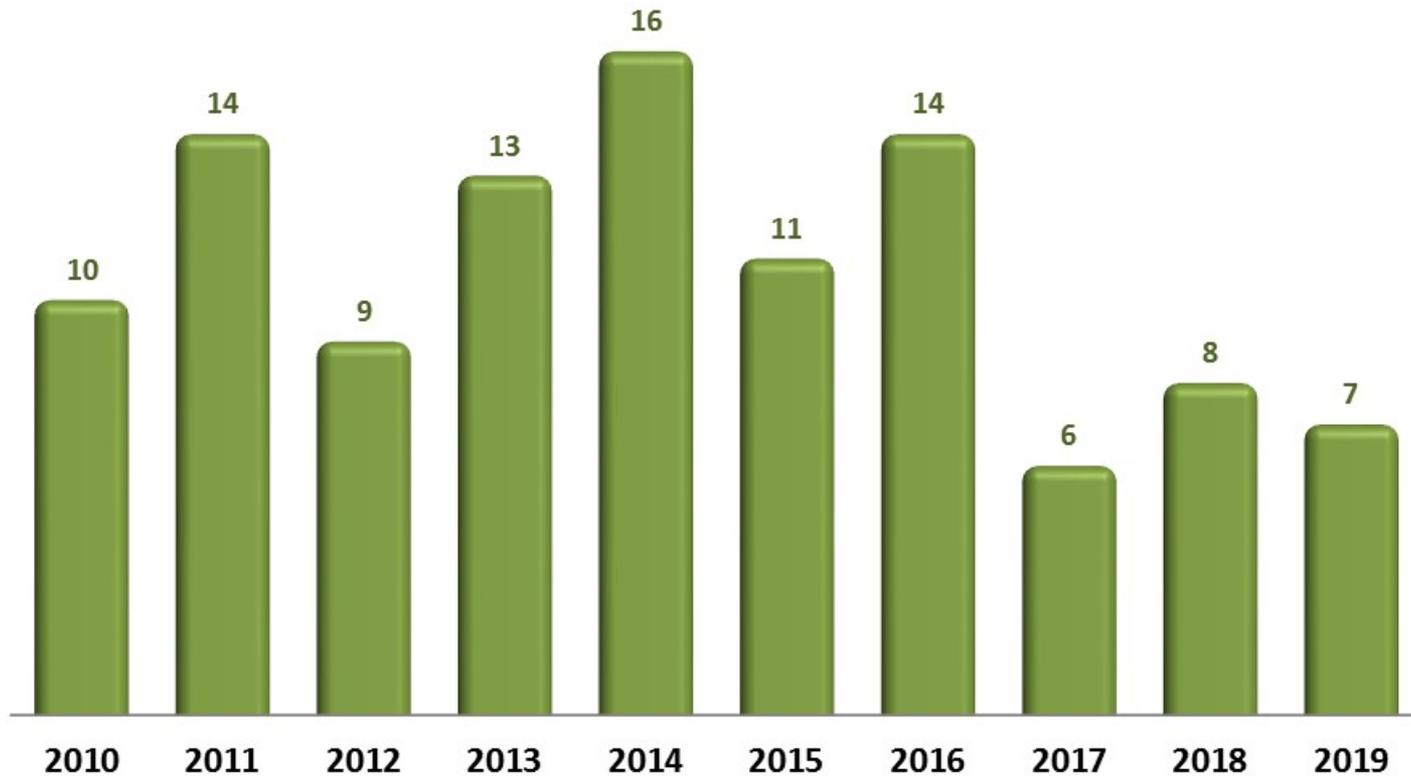
(CDER, FY 2010 - FY 2019)



*Based on inspection start date. Referrals include Complaints, Required Reports, IRB/Sponsor Notifications, and other referrals-internal and external.
[Complis database as of January 3, 2020]

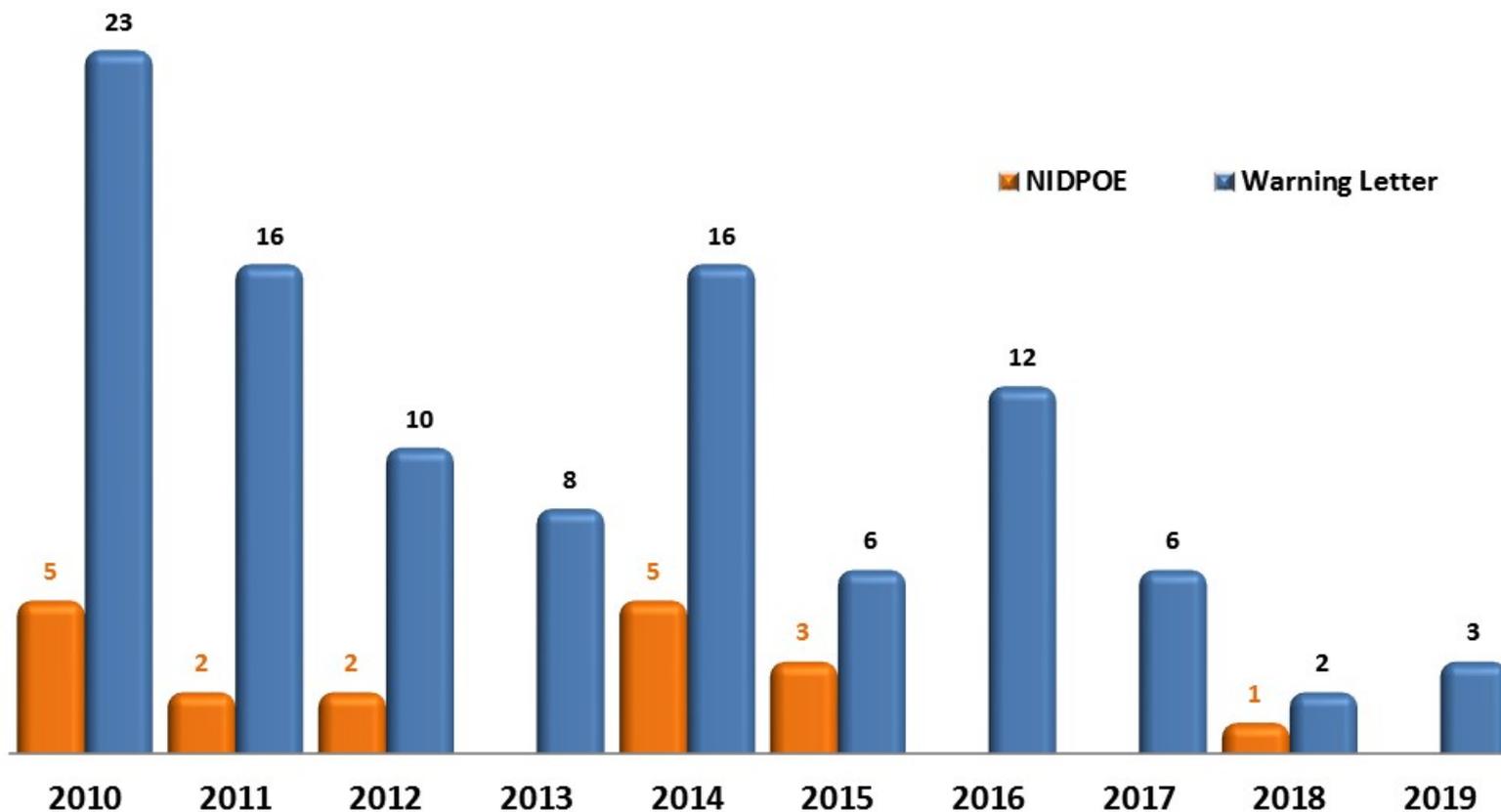
Referral-Related Sponsor Inspections*

(CDER, FY 2010 - FY 2019)



*Based on inspection start date; Referrals include Complaints, Required Reports, IRB/Sponsor Notifications, and other referrals-internal and external.
[Complis database as of January 3, 2020]

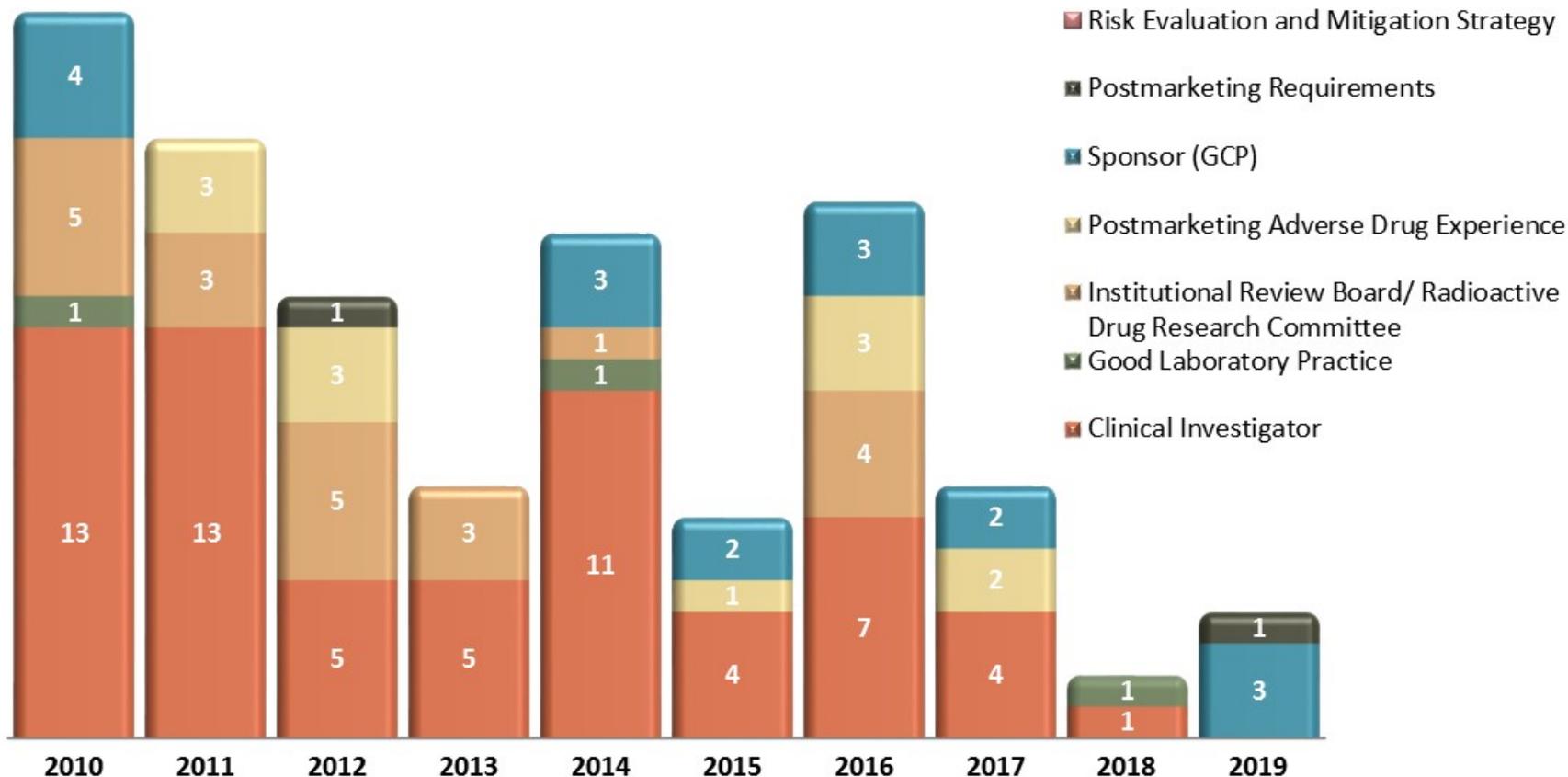
BIMO Warning/NIDPOE Letters* (CDER, FY 2010 - FY 2019)



*Based on letter issue date [Complis database as of January 3, 2020]

- BIMO = Bioresearch Monitoring (Clinical Investigators, Sponsor/CRO/Sponsor-Investigator (GCP), IRB, BEQ, GLP)
- NIDPOE = Notice of Initiation of Disqualification Proceedings and Opportunity to Explain

Warning Letters* (CDER, FY 2010 - FY 2019)

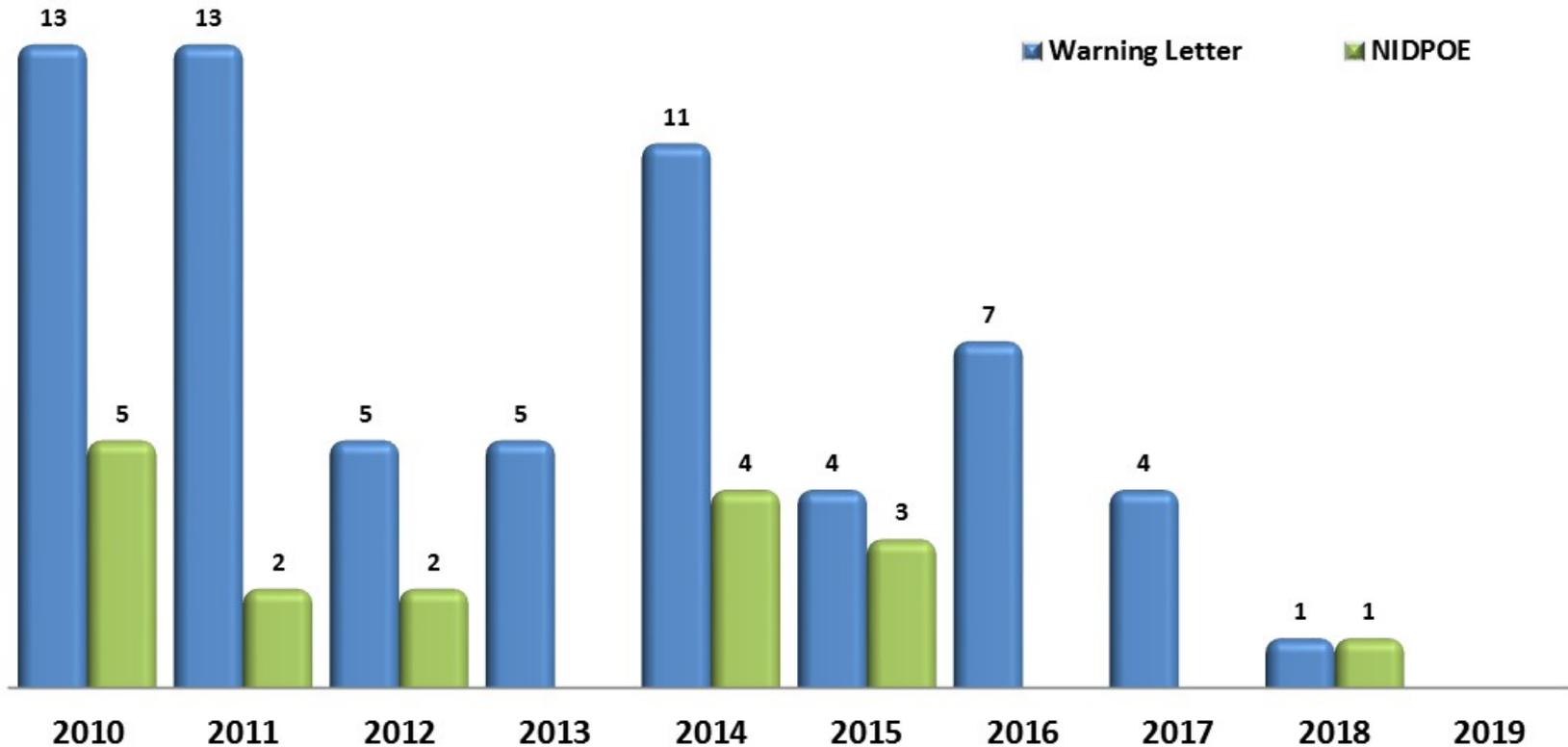


*Based on letter issue date [Complis database as of January 3, 2020]

- As of June 2011, the Postmarketing Adverse Drug Event and Risk Evaluation and Mitigation Strategy programs were incorporated into BIMO.
- PMR includes: Accelerated Approval PMR (21 CFR part 314, subpart H); Pediatric Research and Equity Act PMR; Animal Efficacy PMR (21 CFR part 314, subpart I), and FDA Amendments Act PMRs (section 505(o)(3) of the Federal Food Drug & Cosmetic Act).
- FY 2019 includes one Sponsor Warning Letter that had both Sponsor and Investigator related deficiencies.

Clinical Investigator Warning/NIDPOE Letters*

(CDER, FY 2010 - FY 2019)



*Based on letter issue date [Complis database as of January 3, 2020]

NIDPOE = Notice of Initiation of Disqualification Proceedings and Opportunity to Explain



Clinical Investigator Regulatory Actions*

(CDER, FY 2009 - FY 2019)

Action	FY10	FY11	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19
WL**	13	13	5	5	11	4	7	4	1	0
NIDPOE	5	2	2	0	5	3	0	0	1	0
NOOH	1	2	1	0	0	1	0	0	0	0
CA-Restricted	3	0	0	0	0	0	0	0	0	0
CA-Full DQ	3	2	0	0	2	2	0	0	1	0
DQ-Hearing/Commissioner	2	1	1	0	1	0	0	0	0	0

WL = Warning Letter

NIDPOE = Notice of Initiation of Disqualification Proceedings and Opportunity to Explain

NOOH = Notice of Opportunity for Hearing

CA-Restricted = Consent Agreements (Restricted Agreements)

CA-Full DQ = Consent Agreements (Full Disqualification)

DQ = Disqualification by Hearing or Commissioner

*Based on letter issue date [Complis database as of January 3, 2020]

**WLs are informal and advisory in nature, not regulatory actions (FDA Regulatory Procedures Manual Chapter 4, Section 1-1)



Warning Letters by Program Area*

(CDER, FY 2010 - FY 2019)

Program Area	FY10	FY11	FY12	FY13	FY14	FY15	FY16	FY17	FY18	FY19
Bioavailability/ Bioequivalence**	0	1**	0	0	0	0	1**	0	0	0
Good Laboratory Practice	1	0	0	0	1	0	0	0	1	0
Clinical Investigator	13	13	5	5	11	4	7	4	1	0
Sponsor-Investigator (GCP)	2	0	0	0	0	0	0	0	0	0
Sponsor (GCP)	1	0	0	0	3	2	2	2	0	3
Contract Research Organization (GCP)	1	0	0	0	0	0	0	0	0	0
Institutional Review Board	5	2	5	3	1	0	4	0	0	0
Radioactive Drug Research Committee	0	1	0	0	0	0	0	0	0	0
Postmarketing Adverse Drug Event***	N/A	3	3	0	0	1	3	2	0	0
Risk Evaluation and Mitigation Strategy***	0	0	0	0	0	0	0	0	0	0
Postmarketing Requirements^	N/A	N/A	1	0	0	0	0	0	0	1

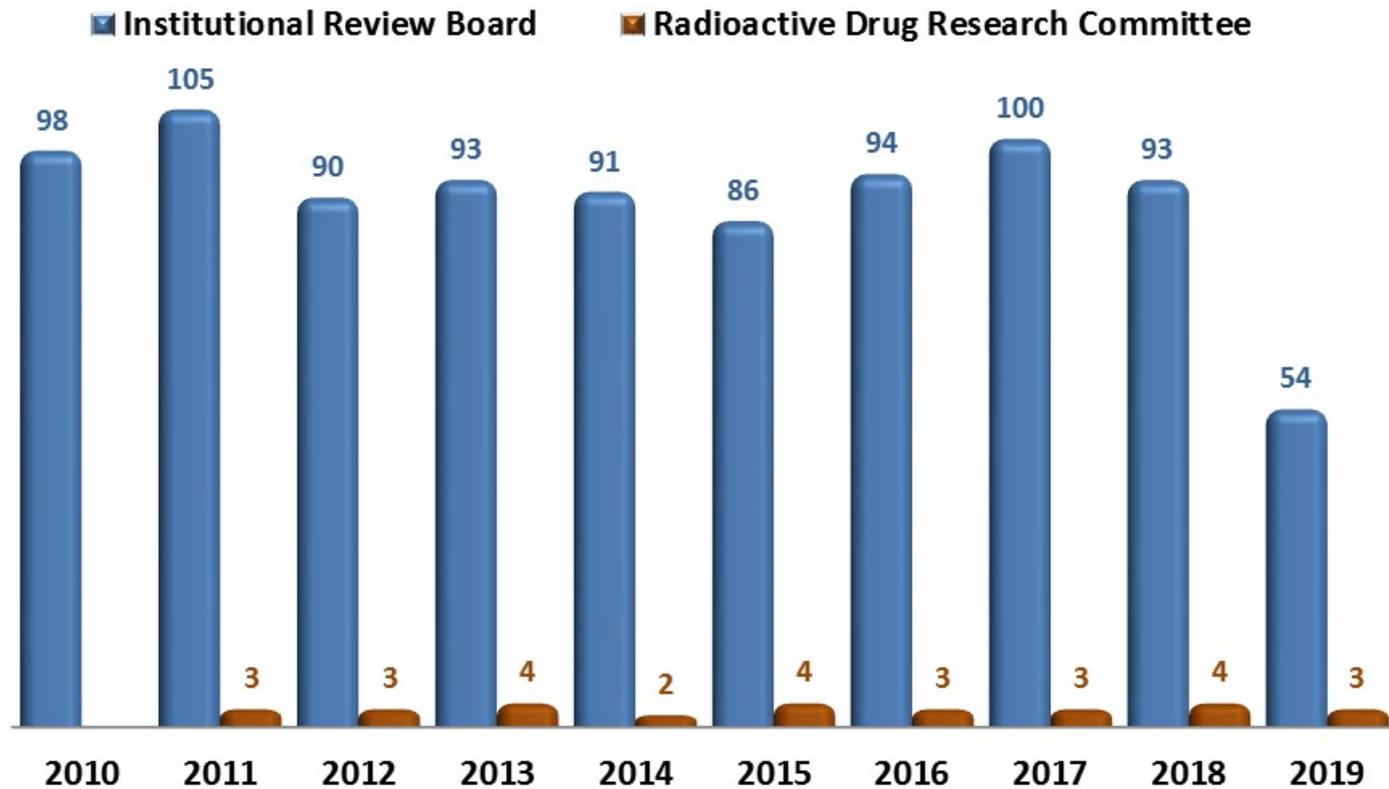
*Based on letter issue date [Complis database as of January 3, 2020]

**Posted Bioavailability/ Bioequivalence OAI untitled letters.

***As of June 2011, Postmarketing Adverse Drug Event and Risk Evaluation and Mitigation Strategies inspection programs incorporated into BIMO.

^ PMR includes: Accelerated Approval PMR (21 CFR part 314, subpart H); Pediatric Research and Equity Act PMR; Animal Efficacy PMR (21 CFR part 314, subpart I), and FDAAA PMRs (section 505(o)(3) of the FD&C Act).

Institutional Review Board/ Radioactive Drug Research Committee Inspections* (CDER, FY 2010 - FY 2019)

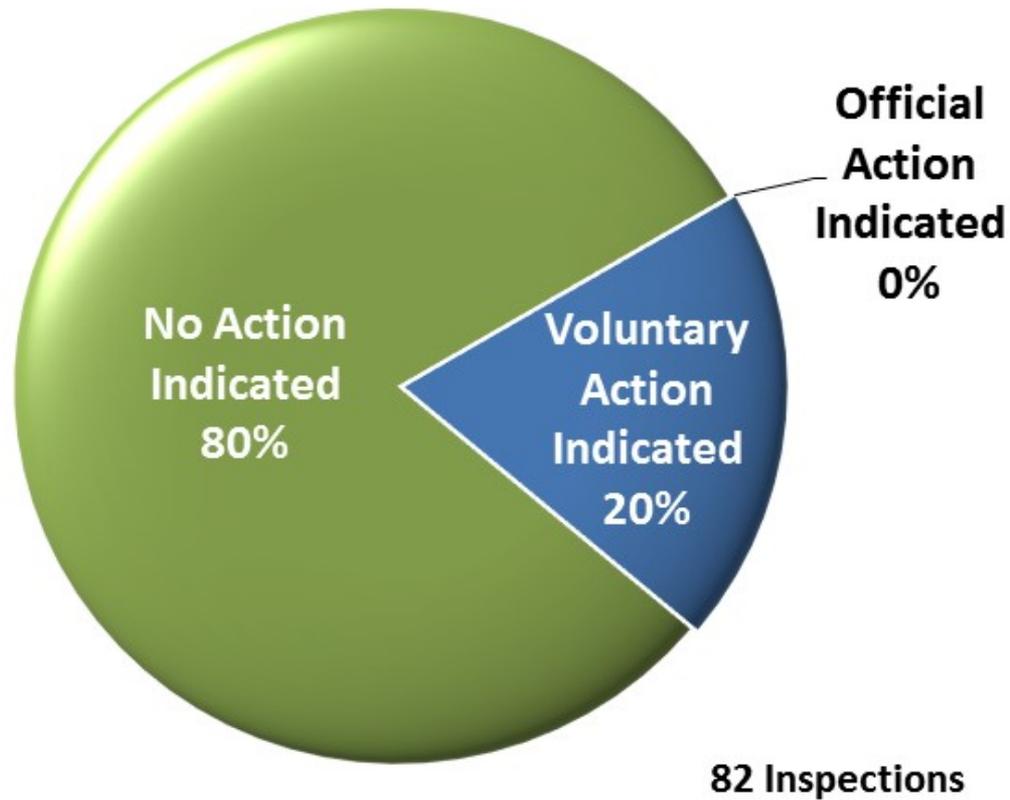


*Based on inspection start date [Complis database as of January 3, 2020]

Includes only CDER numbers – previously reported metrics may have used combined data across CDER, CBER and CDRH

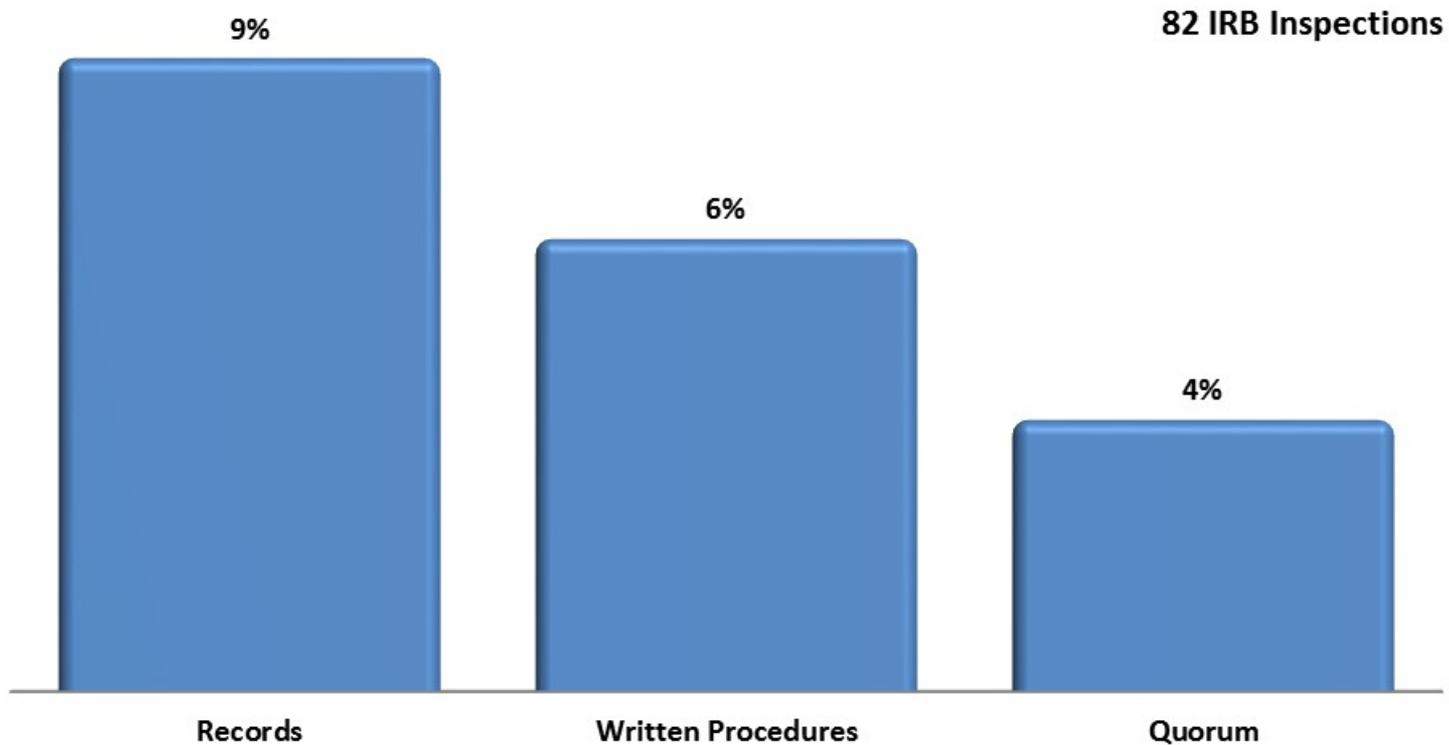
IRB Inspection Final Classifications*

(CDER, FY 2019)



*Based on letter issue date, [Complis database as of January 3, 2020]

Frequency of IRB-Related Deficiencies Based on Post-Inspection Correspondence Issued* (CDER, FY 2019)

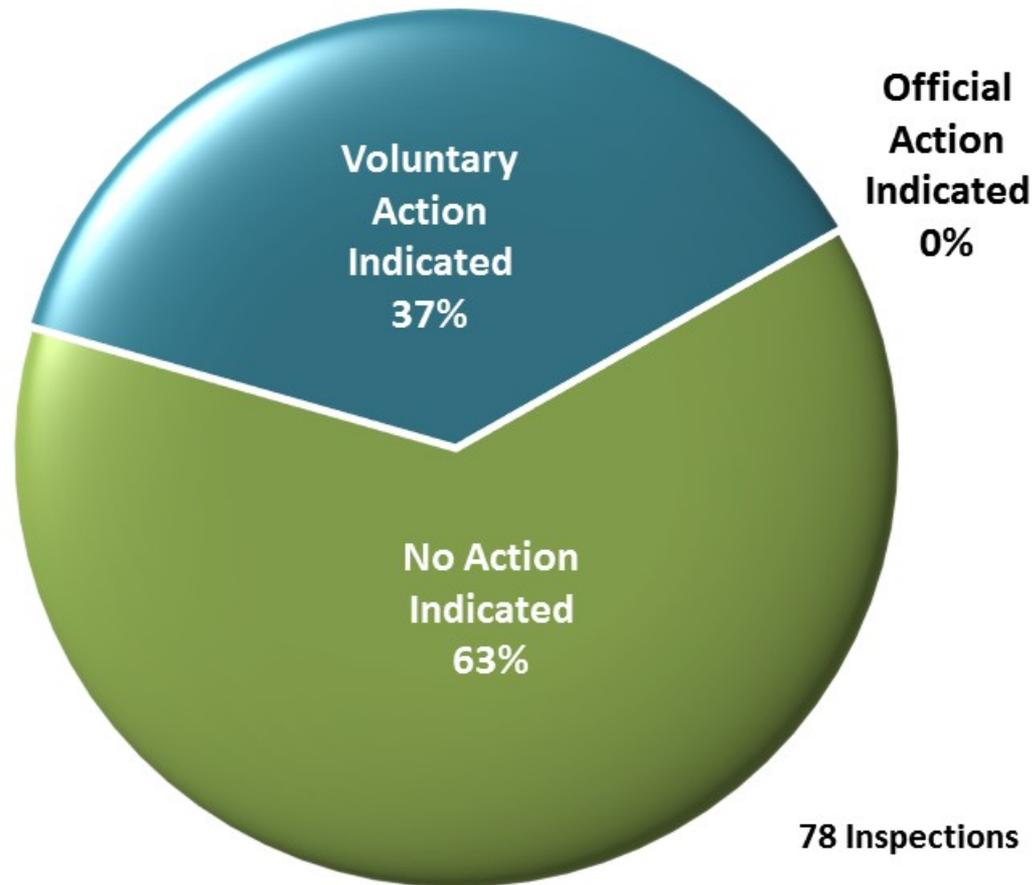


*Based on letter issue date, [Complis database as of January 3, 2020]

Note: this represents the number of inspection reports evaluated and closed which differs from the number of inspections performed.

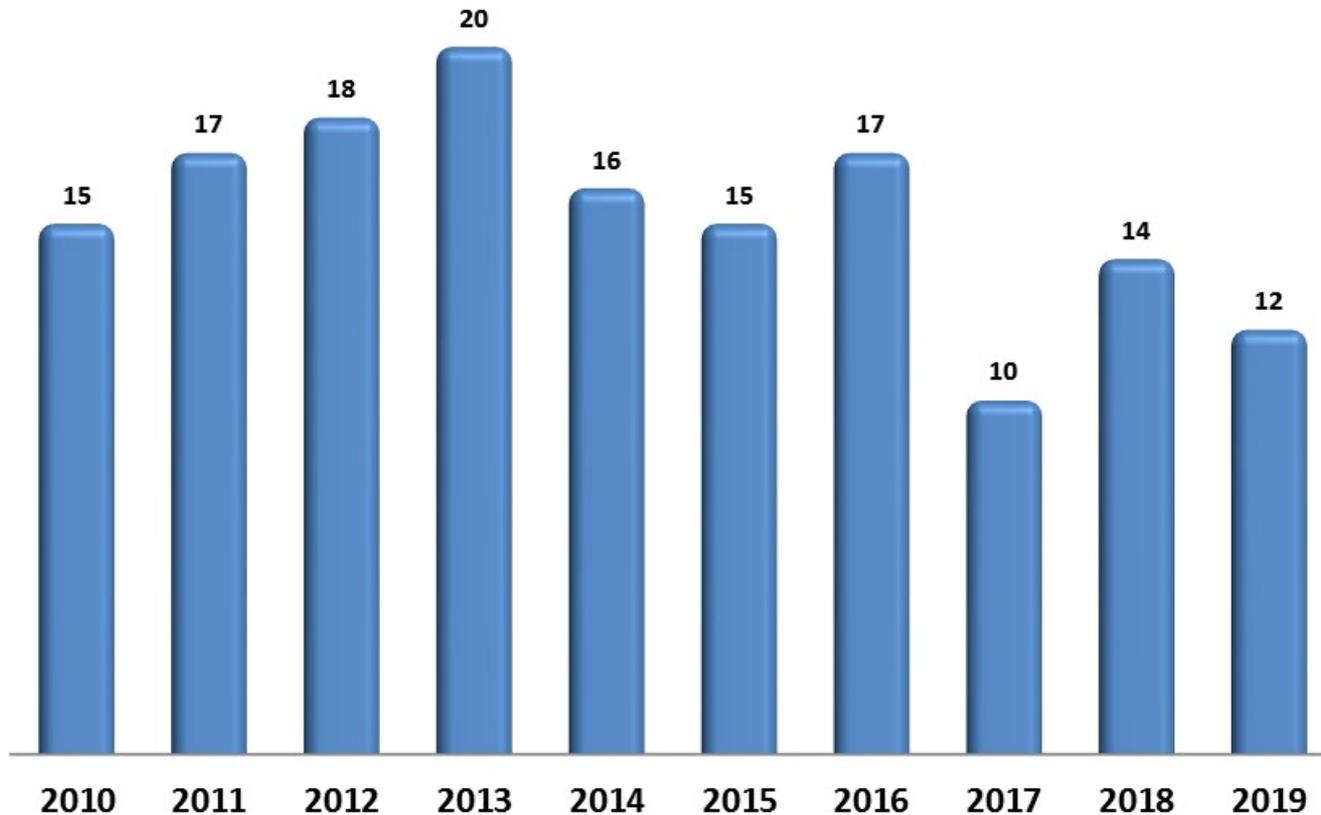
Postmarketing Adverse Drug Experience Inspections*

(CDER, FY 2019)



*Based on Close/Log Out Date, [OSI database as of January 3, 2020]

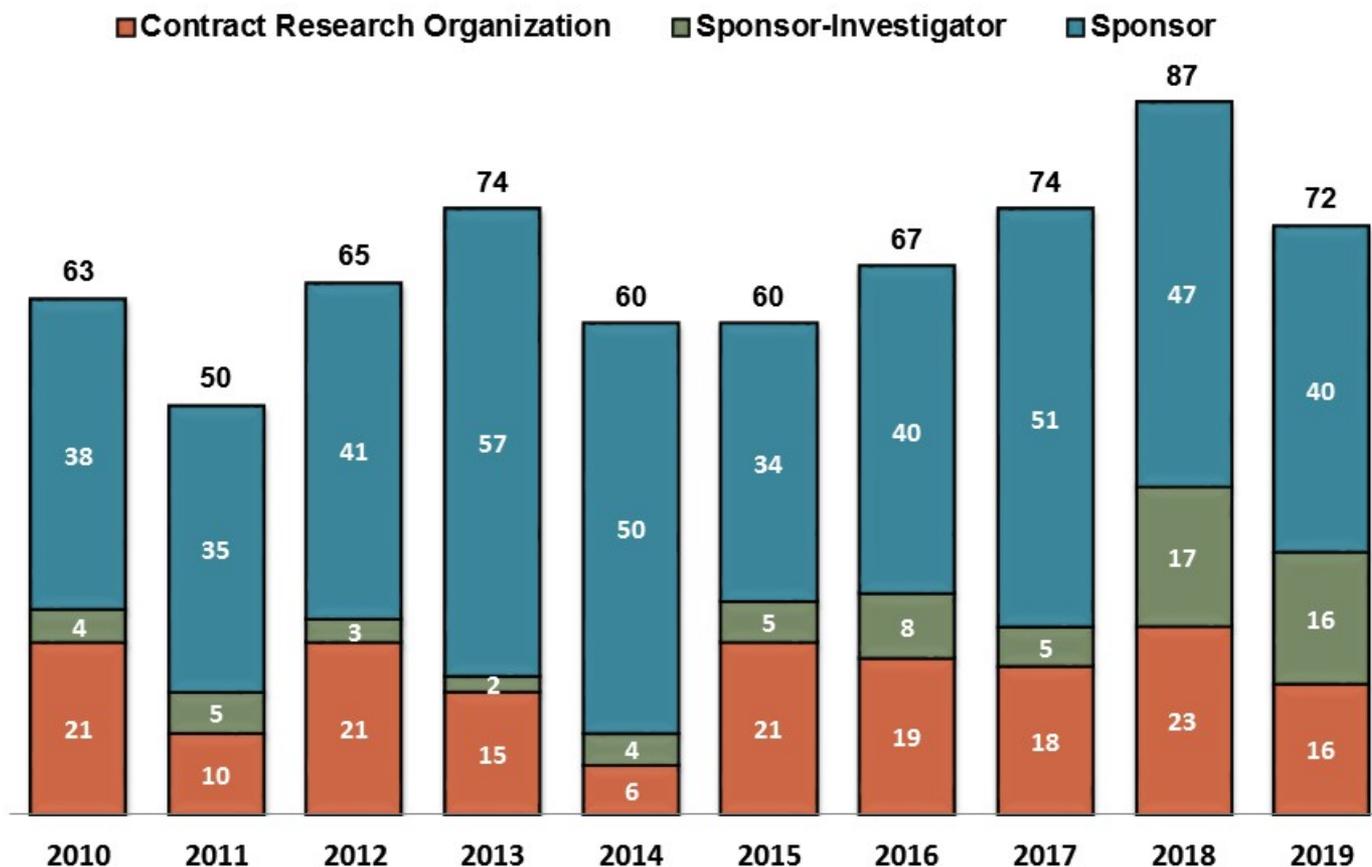
Risk Evaluation and Mitigation Strategies Inspections* (CDER, FY 2010 - 2019)



*Based on date inspection started, REMS inspection program began in FY10.

GCP-Related Sponsor/Contract Research Organizational Inspections*

(CDER, FY 2019)

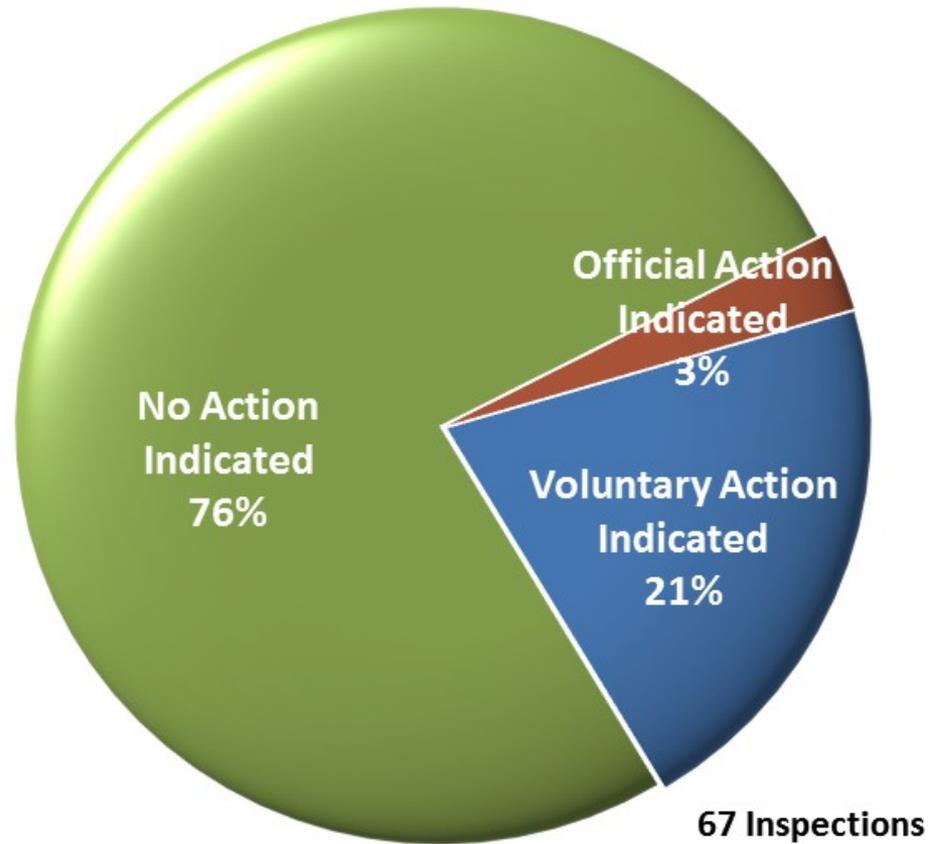


*Based on inspection start date [Complis database as of January 3, 2020]

The Sponsor/CRO distribution shifted for FY09-12 in previous releases due to data corrections in the Complis Database.

GCP-Related Sponsor/Contract Research Organization Inspections Final Classification*

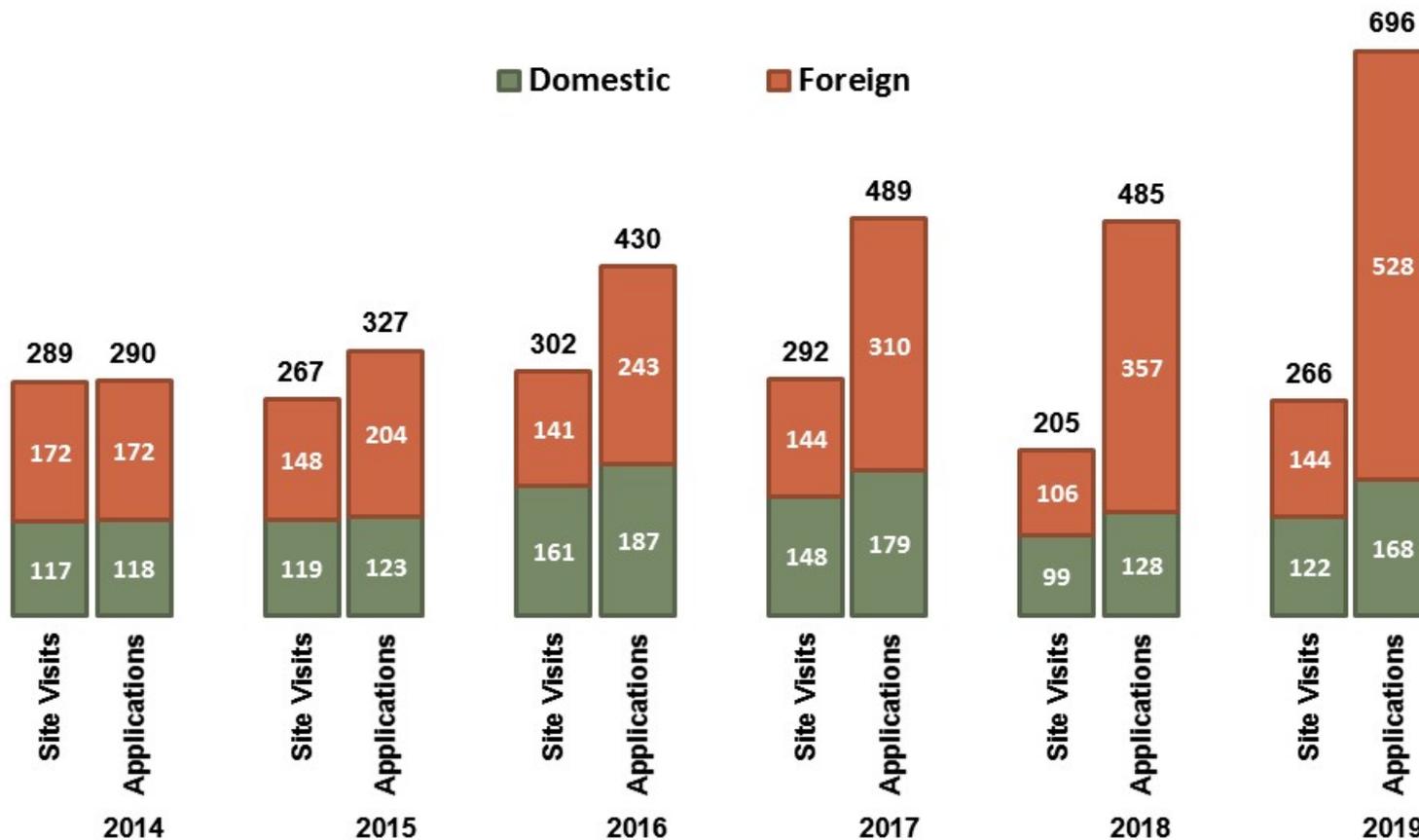
(CDER, FY 2019)



*Based on letter issue date [Complis database as of January 3, 2020]
Includes Sponsor-Investigator Inspections

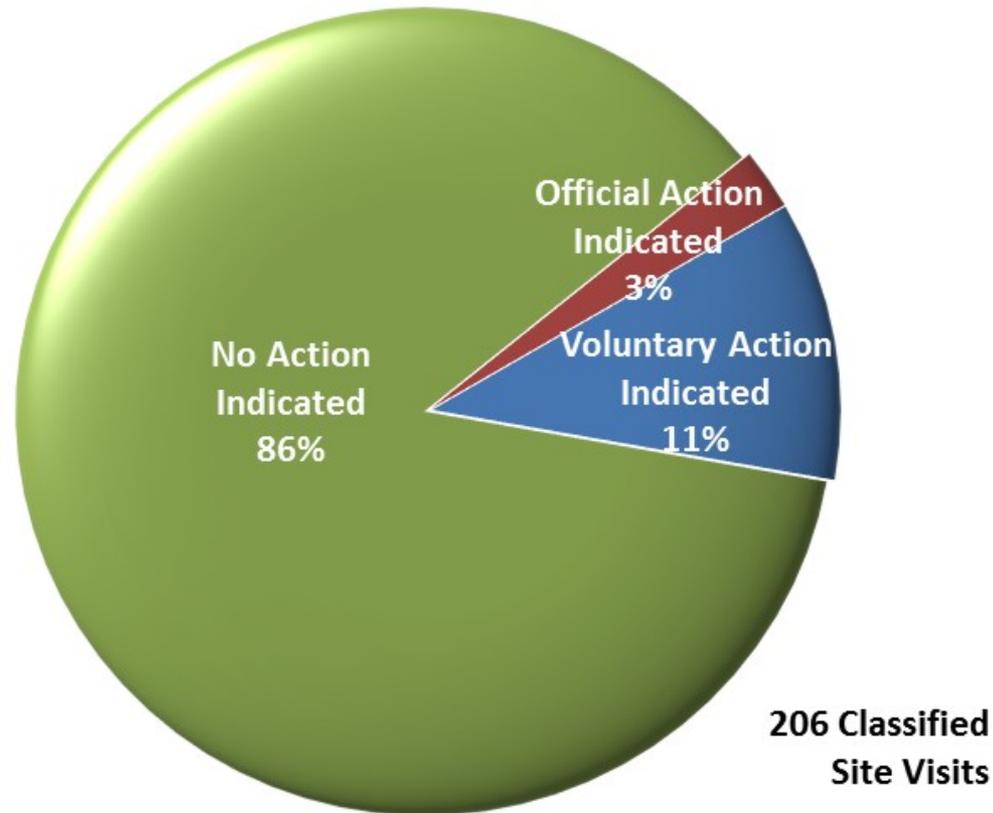
Bioavailability/Bioequivalence Site Visits and Applications Inspected*

(CDER, FY 2014 - FY 2019)



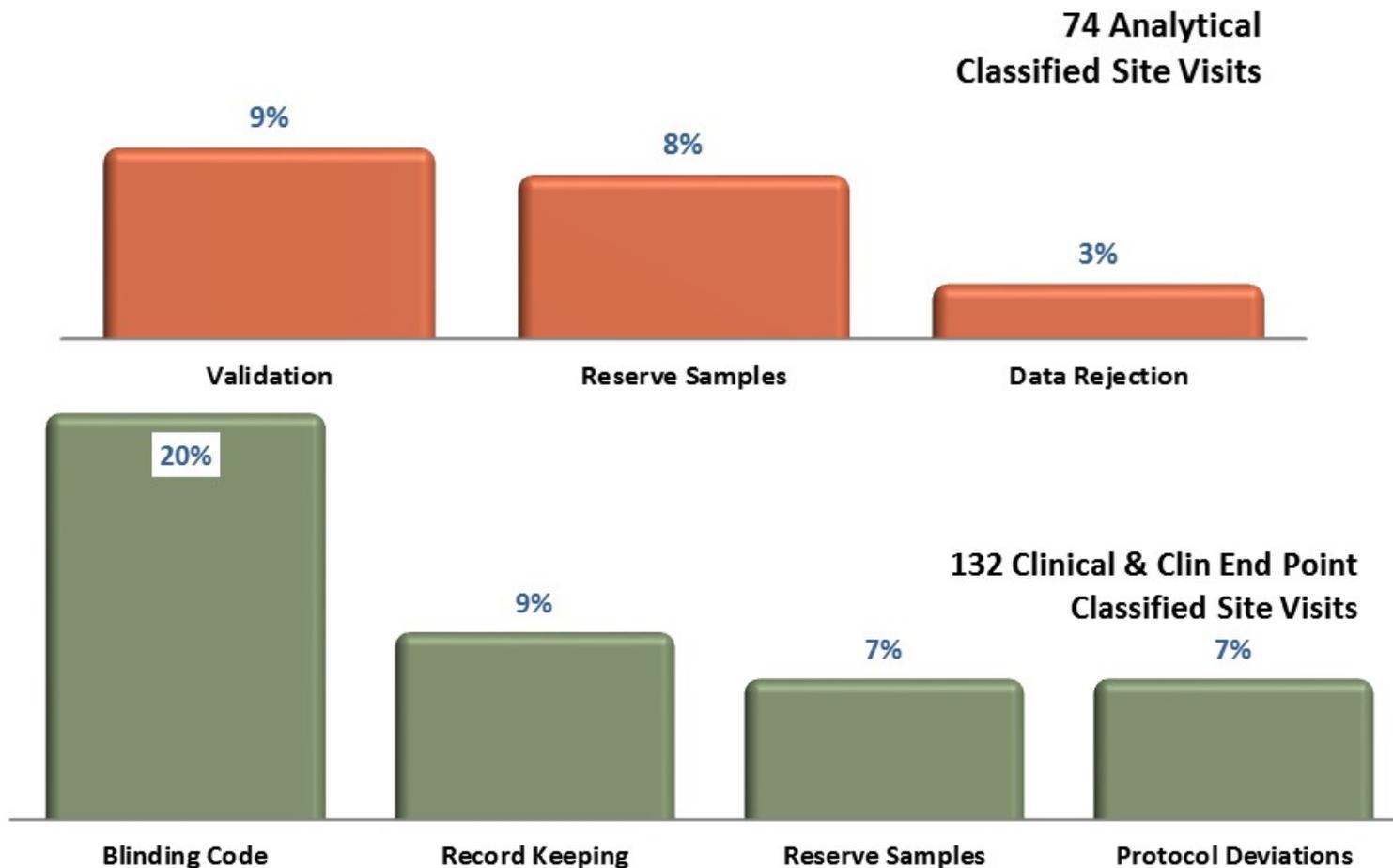
*Based on inspection Start Date [Complis database as of January 3, 2020]
Includes only CDER numbers.

Bioavailability/Bioequivalence Site Visit Final Classifications* (CDER, FY 2019)



*Based on Logout date and Final Classification, [Complis database as of January 3, 2020]

Frequency of BA/BE-Related Deficiencies* (CDER, FY 2019)



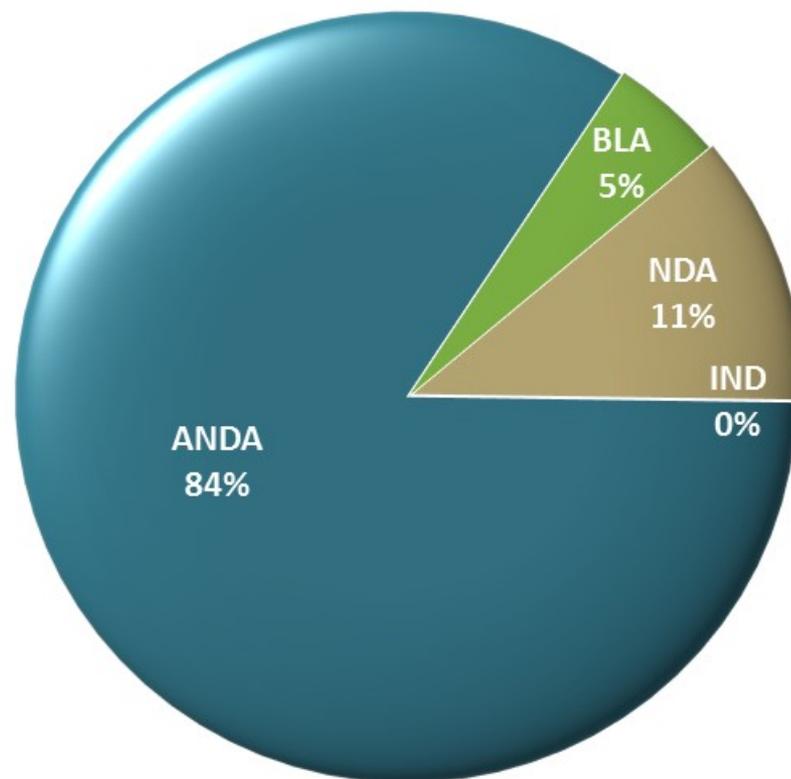
*Based on Logout date and Final Classification, [Complis database as of January 3, 2020]

Note that this does not denote number of inspections completed, but rather number of inspection reports evaluated and closed in the fiscal year.

Bioavailability/Bioequivalence Analytical Site Visit Final Classifications and Application Types* (CDER, FY 2019)



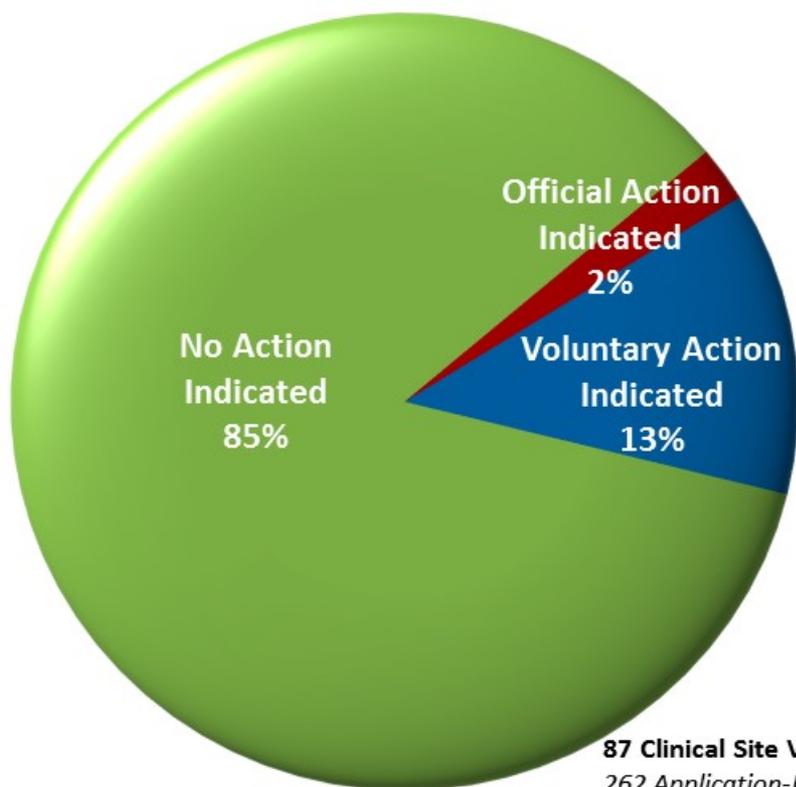
74 Analytical Site Visits
194 Application-Inspections
covering 193 unique applications



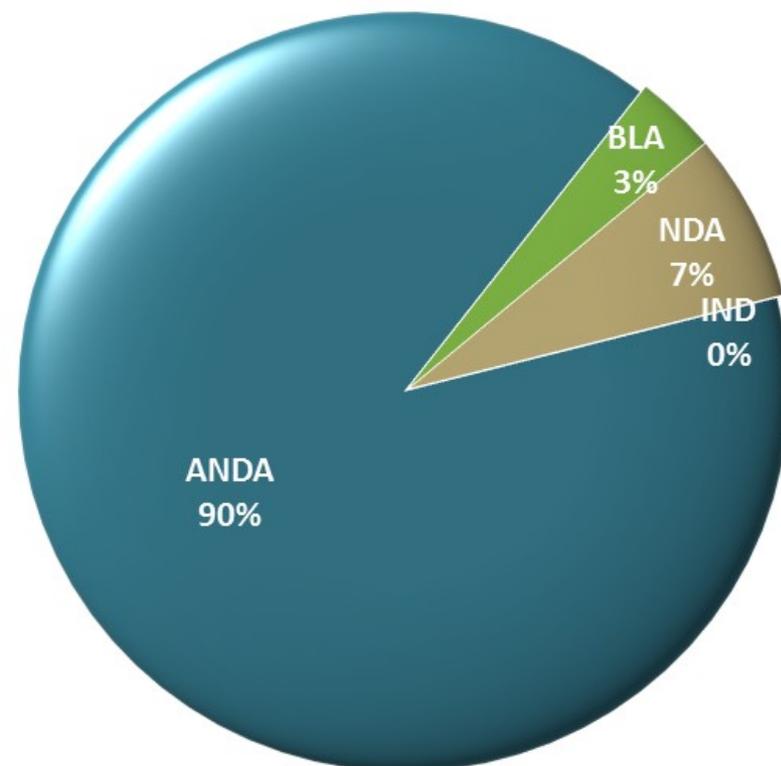
*Based on Logout date and Final Classification, [Complis database as of January 3, 2020]

Bioavailability/Bioequivalence Clinical Site Visit Final Classifications and Application Types*

(CDER, FY 2019)



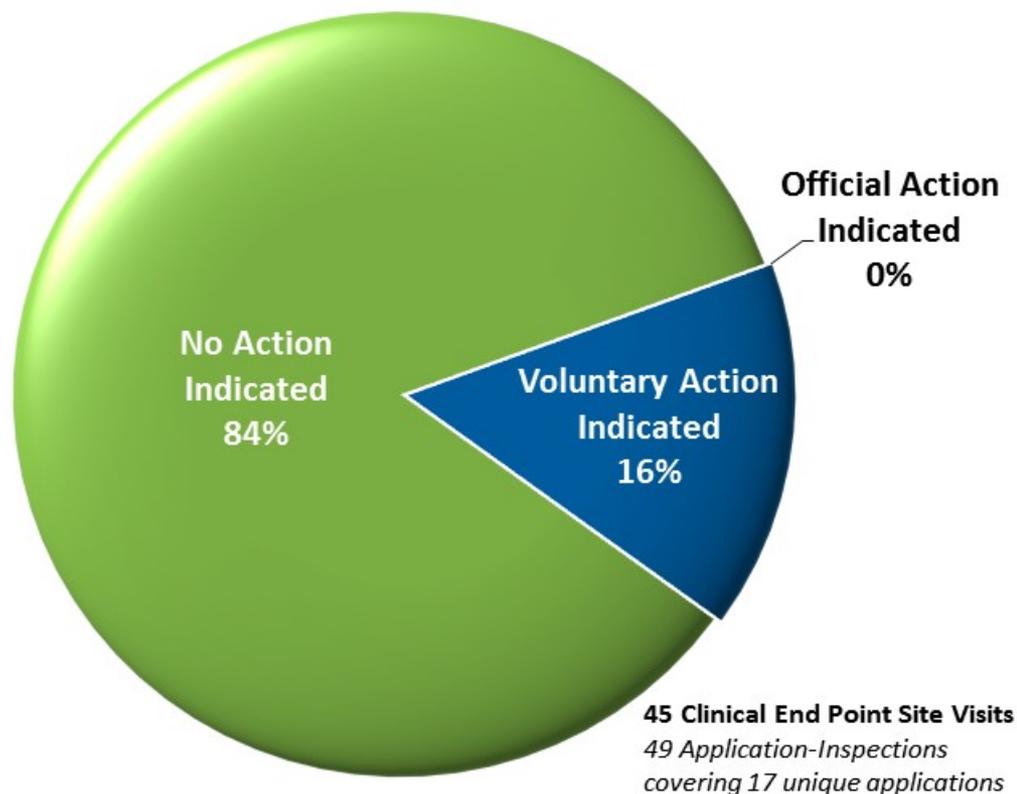
87 Clinical Site Visits
262 Application-Inspections
covering 229 unique applications



*Based on Logout date and Final Classification, [Complis database as of January 3, 2020]

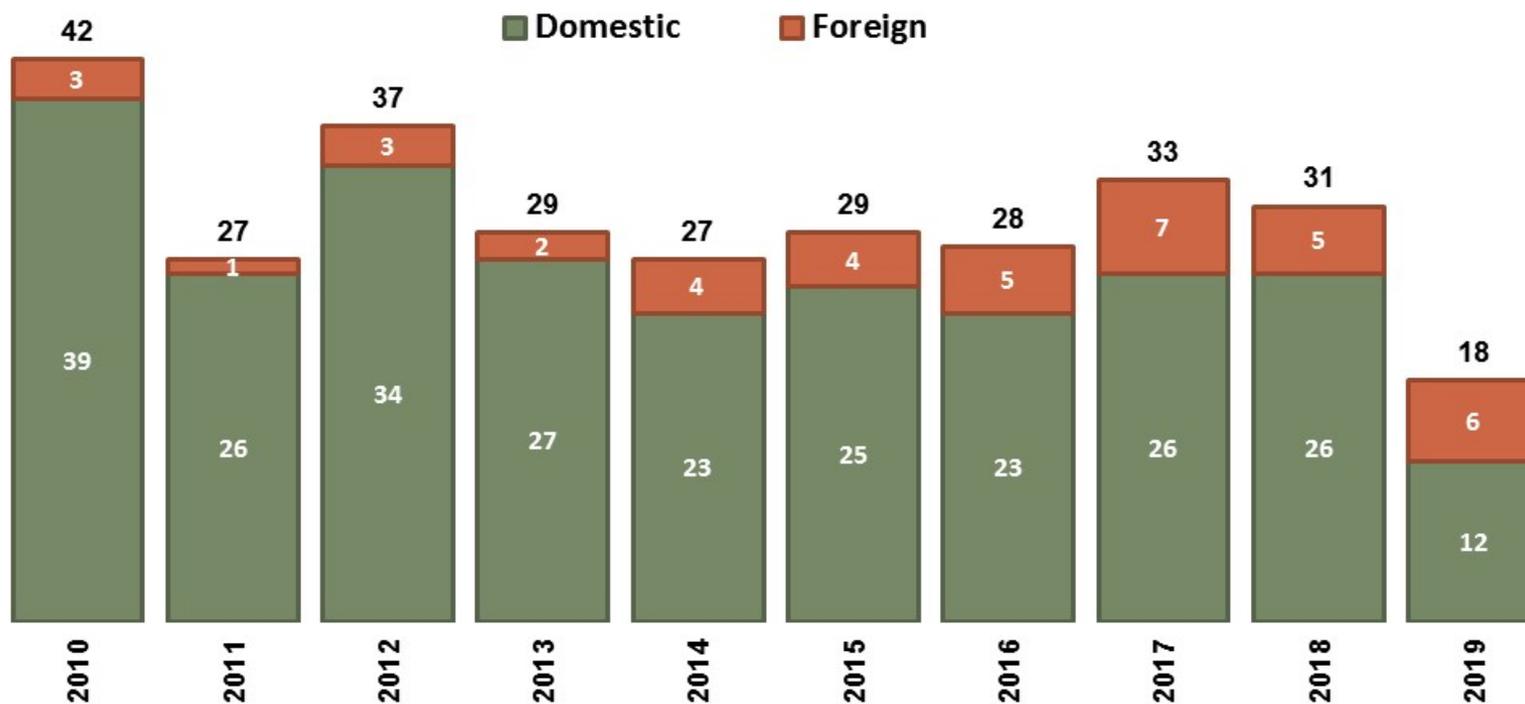
Bioavailability/Bioequivalence Clinical End Point Site Visit Final Classifications*

(CDER, FY 2019)



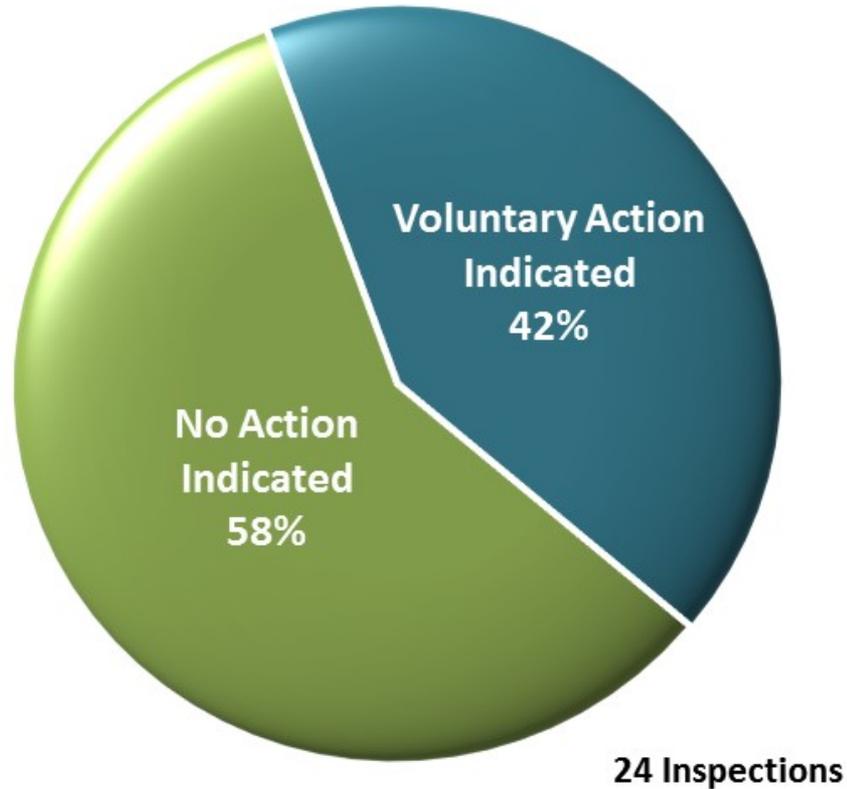
*ANDA Applications based on Logout date and Final Classification, [Complis database as of January 3, 2020]

Good Laboratory Practices Inspections* (CDER, FY 2010 - 2019)



*Based on date inspection started.

GLP Inspection Final Classifications* (CDER, FY 2019)



*Based on Log Out date, [Complis database as of January 3, 2020]