Good Clinical Practice 101: An Introduction

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Objectives:

- Define Good Clinical Practice (GCP)
- Outline the goals of GCP
- Provide a historical perspective on GCP
- Outline FDA regulations relating to GCP in medical device research

What is Good Clinical Practice (GCP)?

- GCP is defined as a standard for the design, conduct, performance, monitoring, auditing, recording, analysis and reporting of clinical trials or studies

Additional terms defined:

- Clinical Investigation
- Clinical Investigator
- Human Subject
- Institutional Review Board

Why is GCP important?

- GCP compliance provides public assurance that the rights, safety and well-being of human subjects involved in research are protected

What are the goals of GCP?

- To protect the rights, safety and welfare of humans participating in research
- To assure the quality, reliability and integrity of data collected
- To provide standards and guidelines for the conduct of clinical research
- Good Clinical Practice = Ethics + Quality Data

What are the foundations for the ethical conduct of clinical research?

- The Nuremberg Code (1947)
- The Declaration of Helsinki (1964)
- The Belmont Report (1979)
- International Conference on Harmonisation (ICH-GCP)
- International Standards Organization 14155
- Code of Federal Regulations

GCP: A Historical Perspective

- **Nuremberg Code (1947)**
  - Voluntary participation
  - Informed Consent
  - Minimization of risk

GCP: A Historical Perspective

- **Declaration of Helsinki (1964)**
  - Well-being of subject takes precedence
  - Respect for persons
  - Protection of subjects health and rights
  - Special protection for vulnerable populations

GCP: A Historical Perspective

- **Belmont Report Ethical Principles (1979)**
  - Respect for Persons
    - Informed consent
    - Protection of vulnerable populations
  - Beneficence
    - Non-malfeasance
  - Justice
    - Fairness

The International Conference on Harmonisation (ICH-GCP)

- GCP is an international quality standard that is provided by the International Conference on Harmonisation (ICH)
- Goals: Harmonize technical procedures and standards; improve quality; speed time to market
- In 1997, the FDA endorsed the GCP Guidelines developed by ICH
- ICH guidelines have been adopted into law in several countries, but used as guidance for the FDA in the form of GCP

What are the 13 principles of ICH-GCP?

- Ethics:
  1. Ethical conduct of clinical trials
  2. Benefits justify risks
  3. Rights, safety, and well-being of subjects prevail
- Protocol and science:
  4. Nonclinical and clinical information supports the trial
  5. Compliance with a scientifically sound, detailed protocol

What are the 13 principles of ICH-GCP? (cont.)

- Responsibilities:
  6. IRB/IEC approval prior to initiation
  7. Medical care/decisions by qualified physician
  8. Each individual is qualified (education, training, experience) to perform his/her tasks
- Informed Consent:
  9. Freely given from every subject prior to participation

What are the 13 principles of ICH-GCP? (cont.)

- Data quality and integrity:
  10. Accurate reporting, interpretation, and verification
  11. Protects confidentiality of records
- Investigational Products
  12. Conform to GMP's and used per protocol
- Quality Control/Quality Assurance
  13. Systems with procedures to ensure quality of every aspect of the trial

A Comparison

DECLARATION OF HELSINKI:

- Ethical principles
  e.g. ethical and scientific
- Focus: Physicians in research
- World Medical Assembly- International medical societies
- Guidance with broad recommendations

ICH-GCP:

- Broader principles e.g. ethical, scientific & operational for designing, conducting, reporting & recording trials
- Focus: Drug sponsors, investigators & IRB
- Representatives from industry and public health
- Guidance document but has the effect of law when put into Regulation

International Standards Organization

- ISO 14155: Clinical Investigation of Medical Devices for Human Subjects
  - Assists sponsors, monitors, and clinical investigators in the design and conduct of device clinical investigations
  - Assists regulatory bodies and ethics committees in their roles of reviewing clinical investigational plans

What constitutes Good Clinical Practice in device research?

- IRB-approved protocol
- Valid Informed Consent
- Monitoring Plan
- Adverse Device Effect Reporting [Adverse Event (AE) or Serious Adverse Event (SAE)]
- Proper documentation
- Valid data collection/reporting procedures

Who is responsible for GCP compliance?

- Sponsors
- Clinical Investigators (CIs)
- Independent Ethics Committees (IECs)
  - Institutional Review Boards (IRBs)
- Contract Research Organizations (CROs)
- Research nurses
- Clinical Research Coordinators (CRCs)
- Clinical Research Associates (CRAs)
- Medical monitors
- Data entry personnel
- Others

How does FDA implement GCP?

- 21 CFR 11 – Electronic Records & Signatures
- 21 CFR 50 – Protection of Human Subjects
- 21 CFR 54 – Financial Disclosure
- 21 CFR 56 – Institutional Review Boards
- 21 CFR 812 – Investigational Device Exemptions
- 21 CFR 814 – Premarket Approval of Medical Devices

Summary:

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For further information:

- FDA Good Clinical Practice Regulations & ICH Guidance

http://www.fda.gov