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# SPONSOR'S RESPONSIBILITIES

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# Sponsor's Responsibilities

- Implement and maintain quality assurance (QA) and quality control (QC) systems

การดำเนินการระบบควบคุมคุณภาพ และระบบรับประกันคุณภาพของงานวิจัย

# Quality

- Quality in clinical researches คุณภาพของการวิจัยทางคลินิก
  - ① Ethical quality standard: มาตรฐานคุณภาพทางจริยธรรม
    - Protect subject's right, confidentiality and privacy (respect for person)
    - Protect safety and wellbeing (do good, do no harm and treat others equitably)
  - ② Scientific quality standard: มาตรฐานคุณภาพทางวิทยาศาสตร์
    - Internal validity and external validity
    - Reliability
    - Data accuracy and credibility

# Quality Management

- A system to manage quality throughout all trial/study process, include
  - ① the design of efficient clinical trial protocols
  - ② tools and procedures for study conduct, data collection and processing

การบริหารจัดการคุณภาพ ได้แก่ การออกแบบและการวางแผนโครงร่างการวิจัย และเครื่องมือ กระบวนการ และระบบการดำเนินการวิจัย รวมทั้งการจัดการข้อมูลการวิจัย

# Quality Management

- Quality management is proportionate to
  - ① risks inherent the trial
  - ② importance of the trial data

การวางแผนการจัดการคุณภาพงานวิจัย ขึ้นกับ

1. ความเสี่ยงอันตรายของงานวิจัย
2. ความสำคัญของข้อมูลการวิจัย

# Quality Management

- Apply risk-based approach
  1. Identify risk (to subjects, data quality and success of study)
     - ① Critical processes and data
     - ② Risks to those critical processes and data at both system level and trial level
     - ③ Evaluate likelihood and impact of risk and
     - ④ Determine how to detect those risks

# Quality Management

- Apply risk-based approach
  - II. Determine how to minimize the risks
    - ① Incorporate in the protocol and monitoring plan
    - ② Predefine quality tolerance limit and actions to be taken

# Quality Management

- Apply risk-based approach
  - III. Document and communicate the quality management activities
  - IV. Periodically review risk control measures
  - V. Report the quality management activities and deviations in the final clinical trial report

# Quality Control

- Activities called "Monitoring"
- Conducted by "Monitor"

# Quality Control

- Purposes:
  - ① The rights and well-being of human subjects are protected.
  - ② The reported trial data are accurate, complete, and verifiable from source documents.
  - ③ The conduct of the trial is in compliance with the currently approved protocol/amendment(s), with GCP, and with the applicable regulatory requirement(s).

# Quality Control

- Develop the monitoring plan based on risk-base approach
  1. Onsite monitoring
  2. Centralized monitoring: use central statistical monitoring

# Quality Control

- Onsite monitoring
  I. Pre-trial site assessment visit
  II. Site initiation visit
  III. Periodic monitoring visit
  IV. Site closeout visit

# Quality Control

- Centralized statistical monitoring
  1. Identify
     - ① missing data
     - ② inconsistent data
     - ③ data outliers,
     - ④ unexpected lack of variability
     - ⑤ protocol deviations

# Quality Control

- Centralized statistical monitoring
  2. Examine data trends e.g.
     - range,
     - consistency
     - variability of data within and across sites

# Quality Control

- Centralized statistical monitoring
  3. Evaluate for
     ① systematic or significant errors in data collection and reporting at a site or across sites
     ② potential data manipulation
     ③ data integrity problems

# Quality Control

- Centralized statistical monitoring
  4. Analyze site characteristics and performance metrics
  5. Select sites and/or processes for targeted on-site monitoring

# Quality Control

- Reports of on-site and/or centralized monitoring should be provided to the sponsor in a timely manner
  - ① Reporting of centralized monitoring activities should be regular
  - ② Reporting of onsite-monitoring should be after each site visit
- All findings/issues should be followed and resolved

# Quality Assurance

Quality Assurance

- Activities called "Audit"
- Conducted by "Auditor"
- The sponsor should
  - Appoint auditors, who are independent of the clinical trials/systems, to conduct audits.
  - Ensure that the auditors are qualified by training and experience

# Sponsor's Responsibilities

- Ensure record access is permitted
  - Written agreement to allow direct access to source documents for monitoring, auditing and inspection at the trial sites
  - Each subject has consented

มั่นใจได้รับการอนุญาตเป็นลายลักษณ์อักษรให้เข้าตรวจข้อมูลจาก

1. นักวิจัยและสถาบัน
2. อาสาสมัคร

# Sponsor's Responsibilities

- Manage noncompliance
  - Significant noncompliance should have root cause analysis and implementation of appropriate corrective and preventive action

การจัดการ การไม่ปฏิบัติตาม (1) โครงร่างการวิจัย (2) GCP และ (3) กฎข้อบังคับที่เกี่ยวข้อง

1. การแก้ไข (corrective action)
2. การหาสาเหตุ การแก้ไขเพื่อป้องกันการเกิด (preventive action)
3. การบันทึก และการรายงาน (document and report)

# Sponsor's Responsibilities

- Utilize qualified person as appropriate, throughout all stages of the trial process
  - ① Designing the protocol and CRF (case report form)
  - ② Planning the data analysis and final clinical trial report

# Sponsor's Responsibilities

- Utilize qualified person
  - ③ To manage clinical research and supervise overall conduct of the clinical research
  - ④ To handle, verify and analyze data
  - ⑤ To prepare the final research report

# Sponsor's Responsibilities

- Establish Data Safety Monitoring Board (DSMB) or Independent Data Monitoring Committee (IDMC)

# Sponsor's Responsibilities

- File, maintain and archive essential documents
  - ① Trial master files (TMF)
  - ② Investigator or Site files
- Retain all essential documents in TMF
- Inform investigator in writing of the need for document retention and when they are no longer needed

# Sponsor's Responsibilities

- Conduct of data management ดำเนินการจัดการข้อมูล
  - Use subject identification code for each subject's reported data
  - Maintain audit trails
  - Ensure the original data and processed data can be compared
  - If the electronic data processing system is used, ensure the completeness, accuracy, reliability and consistency of the system

# Electronic Data System

- Document and ensure that the electronic data processing system conforms to the requirements, i.e., validation
- The validation should base on a risk assessment and the potential of the system to affect human subject protection and reliability of trial results

# Electronic Data System

- Maintain SOPs for system setup, installation, and use of the system which describe
  - ① system validation and functionality testing,
  - ② data collection and handling,
  - ③ system maintenance,
  - ④ system security measures,

# Electronic Data System

- Maintain SOPs for system setup, installation, and use of the system which describe
  - ⑤ change control,
  - ⑥ data backup, recovery, contingency planning, and decommissioning.
  - ⑦ responsibilities and training required

# Electronic Data System

- Maintain security system
- Maintain adequate backup of the data
- Ensure integrity of data

# Sponsor's Responsibilities

Investigational Product (ผลิตภัณฑ์ที่ศึกษาวิจัย)

- Provide the product information including storage condition ข้อมูลผลิตภัณฑ์ การใช้ และการจัดเก็บ
- Product manufactured, packaged and labeled in accordance with any applicable GMP and regulatory requirements การผลิตและคุณภาพผลิตภัณฑ์

# Sponsor's Responsibilities

## Investigational Product (ผลิตภัณฑ์ที่ศึกษาวิจัย)

- In case of blinding, blind code kept in secure place and emergency code breaking process is established
  การปกปิดฉลาก การเก็บและปกปิด code และการเปิด code ในภาวะฉุกเฉิน
- Timely and appropriate delivery and adequate supply of product การจัดส่งผลิตภัณฑ์ภายในเวลา และพอเพียง

# Sponsor's Responsibilities

Investigational Product (ผลิตภัณฑ์ที่ศึกษาวิจัย)

- Maintain records that document (compliance of drug use) การบันทึก การตรวจความถูกต้องการใช้ และการเก็บรักษาเอกสาร

  ① shipment, receipt,

  ② dispensing and retrieval of unused products from subjects,

  ③ return of unused products to sponsor,

  ④ disposition and destruction of products

# Implication to Other Interventions/Procedures

- Quality of the intervention (program or procedures) คุณภาพ
- Standardization of the intervention มาตรฐานการปฏิบัติตาม
  - Size of exposure, frequency and duration
- Evaluation and record of compliance with the intervention protocol (fidelity to behavioral intervention) การประเมิน และการบันทึกการปฏิบัติตาม

# Sponsor's Responsibilities

Safety reporting and safety information ข้อมูลความปลอดภัยและการรายงาน

- Provide safety information การรวบรวม และแจ้งข้อมูลความปลอดภัย
- Continually evaluate and update safety information การวิเคราะห์ ประเมิน และการรายงานข้อมูลความปลอดภัยปัจจุบัน

  ① Expedite the report of all adverse drug reaction that are serious and unexpected

  - Suspected Unexpected Serious Adverse Reaction (SUSAR)

# Sponsor's Responsibilities

Safety reporting and safety information

- Continually evaluate and update safety information
  - ② Periodically review and submit the summary safety reports
    - **Development Safety Update Report (DSUR)**
    - Line listing

# Sponsor's Responsibilities

- Confirmation of review by IRB/IEC
  - ① Obtain name and address of investigators IRB/IEC
  - ② Obtain statement of IRB/IEC that it organized and operates according to GCP, laws and regulations
  - ③ Obtain the documentation of IRB/IEC approval

# Other Sponsor's Responsibilities

- **Compensation**
  - To investigators/institutes for claims arising from the trial
  - To subjects for the event of trial-related injuries
- **Financing**
- Notification or submission to regulatory authorities

# Other Sponsor's Responsibilities

- Multicenter trial การวิจัยแบบพหุสถาบัน
  - ① Ensure strict compliance with protocol
  - ② Design Case Report Form (CRF) to ensure completeness and accuracy of data collection
  - ③ Document responsibilities of coordinating and participating investigators
  - ④ Give instruction on following the protocol, uniform set of standard for assessments of clinical and lab, and CRF completion

# Other Sponsor's Responsibilities

- Investigator selection
- Contract research organization (CRO)
- Prepare the final clinical study report การจัดทำรายงานผลการศึกษาวิจัยฉบับสมบูรณ์

# QUESTIONS & DISCUSSION