Recent Veterinary GCP and University GLP Regulatory Inspectional Experiences:

A Comparison of Perceptions from Site Qualification to Site Inspection

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- BSI QA auditors recently supported a GLP and 2 vetGCP regulatory inspections.
- Initial site inspections/qualifications to in-progress study activities to the regulatory inspections.
- Lessons Learned

University GLP

- BSI QA served as GLP Test Site QAU for activities conducted at a university lab.
- Site had limited GLP experience
  - Training files, Org Chart, MS, SOPs, etc.
- GLP infrastructure in place
  - Simple Org Chart : Mgmt.→ PI(client) → Lab Tech

University GLP-2

- Audit / inspection issues:
  - MS deficiencies.
  - GLP Mgmt. training file
    - CV not signed / dated per facility SOP
    - No JD per SOP and GLPs
    - No documented Mgmt. GLP training

University GLP-3

- Regulatory Inspection:
  - No issues w/ lab or study documentation.
  - Inspection scope expanded to include entire university.
    - Inspectors went outside of GLP infrastructure
    - Requested interview w/ VP Research Admin

Veterinary GCP study

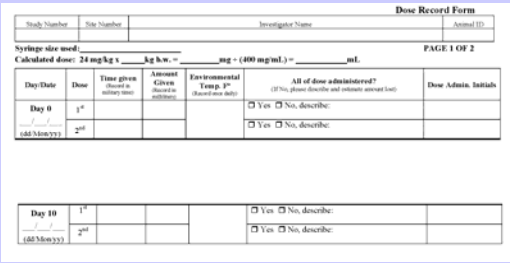
- BSI QA functioned as overall study QAU for a vetGCP field efficacy study.
  - Participated in site qualifications
  - Performed in-life inspections and raw data & report audits
  - 2 of 5 sites were selected for regulatory inspection

VetGCP site 1

- At qualification, no site SOPs
  - Documented procedures / practices as signed / dated NTFs before conducting study activities
- At in-phase audit, dosing records indicated that some animals rec'd an additional dose of IVP
  - Protocol deviation – 21 instead of 20 doses

VetGCP site 1(cont.)

- Form 15A & B



Dose Record Form

Study Number	Site Number	Investigator Name	Animal ID

Syringe size used:_____ PAGE 1 OF 2

Calculated dose: 24 mg/kg x _____kg b.w. = _____mg ÷ (400 mg/mL) = _____mL

Day/Date	Dose	Time given (Record in military time)	Amount Given (Record in milliliters)	Environmental Temp. F° (Record once daily)	All of dose administered? (If No, please describe and estimate amount lost)	Dose Admin. Initials
Day 0 ___/___/___ (dd/Mon/yy)	1st				☐ Yes ☐ No, describe:	
	2nd				☐ Yes ☐ No, describe:	
Day 10 ___/___/___ (dd/Mon/yy)	1st				☐ Yes ☐ No, describe:	
	2nd				☐ Yes ☐ No, describe:	

VetGCP site 1(cont.)

- Regulatory Inspection:
  - Inspector had very strict, literal interpretation of protocol – "animal potentially needs discontinuation of dosing"
  - However, Study Monitor instructed CI to remove animals if they did not meet certain intermediate criteria
  - Inspector interpreted "potential" to mean that animals did not have to be removed.

VetGCP site 2

- At qualification:
  - No documented GCP training
  - No CV's for some site personnel
- In-phase audit:
  - Documentation issues
  - Multiple personnel – training variations

VetGCP site 2(cont.)

- Regulatory Inspection:
  - Inspector asked what happened to animals upon removal – post-removal obs not stipulated in protocol
  - Inspector asked if animals were treated once removed
    - Treated with "benign neglect" – no positive documentation that animals were not treated

VetGCP site 2(cont.)

- Other site 2 issues:
  - IVP dispensing data not recorded contemporaneously – had to be transcribed from other records
  - CI used Attending Vets when unavailable
    - Attending Vet enrolled a pregnant animal – contrary to study enrollment criteria

VetGCP site 2(cont.)

- Attending Vet & other site personnel (not the CI) enrolled animals w/o having enough un-dispensed IVP
  - 3 animals dosed with previously-dispensed IVP: protocol deviation
  - "Robbed Peter to pay Paul"
  - Those 3 animals had to be removed from efficacy analysis

Lessons Learned

- From GLP Regulatory Inspection:
  - Regulatory inspectors can ask to interview individuals outside of GLP infrastructure.
  - Mgmt. training is crucial!
  - Upper Mgmt. needs to take time for Regulatory Inspectors

Lessons Learned(cont.)

- From vetGCP Regulatory Inspections:
  - IVP acct., animal welfare, & protocol compliance are stressed
  - Sponsor due diligence
  - Clinical Investigator oversight
  - Documented training

- Thank you for your attention!
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