INTERNATIONAL PARTNERSHIP FOR MICROBICIDES

Inspection Preparation: Dapivirine Ring Dossier Submission

Robert A. Noland
Senior Director, Quality Assurance, IPM

Developing HIV Prevention Products for Women worldwide

Presentation Outline

- Current dossier submission timelines
- Preparation activities to date, for both ASPIRE (MTN-020) and The Ring Study (IPM 027)
- Future preparation plans and activities
- Suggestions for inspection SOP and/or policy

Current Submission Timelines

- IPM plans to submit the dapivirine ring dossier to EMA (under Article 58) and the South African Medicines Control Council in 2nd QTR 2017
- Submit dossier to FDA about 2 quarters later
- Submissions will include the data from both pivotal trials (IPM 027 and MTN-020)

Inspection Preparation to date: ASPIRE

- Training sessions by former FDA inspector with clinical research site staff at Sept 2015 MTN Regional Meeting in Cape Town (including “case studies”)
- Mock inspections were conducted by contractor at 7 priority clinical sites
- Site presentations on “Lessons Learned” from mock inspections and inspector feedback
- Training on interviews, dealing with staff turnover, use of notes to file, etc.

Inspection Preparation to date: IPM's Ring Study

- Half-day training session with research centres at Sept 2015 Annual Meeting in Cape Town, covering:
  - details of inspection management
  - "Dos and Don'ts" of inspection behavior
  - interview training with role-playing
- Established Inspection Readiness Team
  - Monthly meetings began May 2016
  - Established three "tiers" of inspection possibilities for pivotal trials

Inspection Possibilities – Ring Dossier

- First tier: QPharma (Sweden), IPM 027 and MTN-020 research centres
- Second tier: IPM Paarl office, Omnichem
- Third tier: Parexel bioanalytical lab (Bloemfontein), BARC reference lab (Joburg), DF/Net and/or SCHARP (Seattle), SGS, IPM Silver Spring office, Trelyst, etc.

16-Aug-16 Conference Call

- DAIDS has a “decentralized” approach to the trial master file, which has been accepted by regulatory agencies
- Required documentation can be provided quickly
- Each CRS has inspection SOP with defined inspection teams

Inspection Preparation: IPM 027

- Mock inspections of several IPM 027 research centres in 1st and 2nd Qtr 2017
- Pre-inspection visits at other research centres during 1st and 2nd Qtr 2017
- Additional pre-inspection visits at research centres when inspections are announced, if possible

Pre-inspection Visits

- Document inventory (not an audit!)
- Refresher training on inspections
  - Identify specific rooms to be used
  - Update communication plan and inspection team members
  - Assure preparation room is ready

Suggestions for Inspection SOP and/or Policy

- Things you might control with the SOP or policy:
  - Review of documents before providing to inspectors
  - Taking photographs or voice recordings
  - Signing of written statements
  - Speculating or answering hypothetical questions
  - 1-on-1 interviews with inspectors (i.e., no observers)
  - Direct access to an employee computer
  - Agreeing with potential observations
- Approved by most senior official at site

- Questions?

Definitions

- Inspection -- a formal audit conducted by an authorized representative of a regulatory authority
- Audit -- a systematic examination of records by personnel independent of the operation of the system being examined (Quality Assurance)
- Observation -- a detailed description of a set of circumstances that appears to represent a departure from established standards