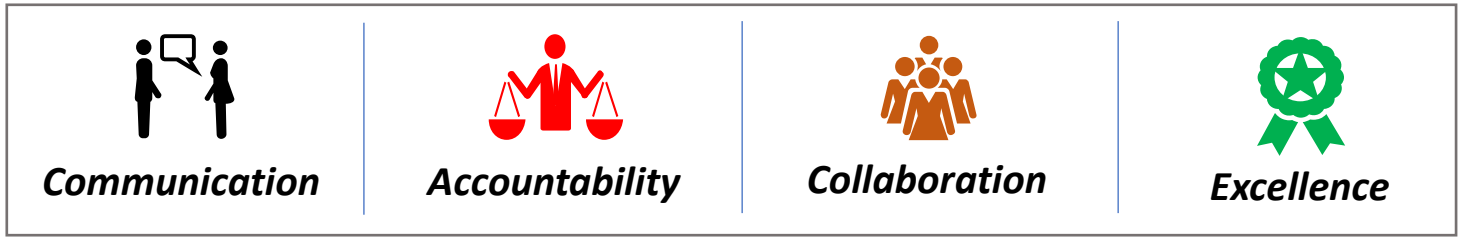
Office of Study Integrity and Surveillance (OSIS): Mission and Vision



Tahseen Mirza, PhD
Associate Director for Regulatory Affairs
Office of Study Integrity and Surveillance/Office of Translational Sciences/
Center for Drug Evaluation and Research/U.S. Food and Drug Administration(FDA)

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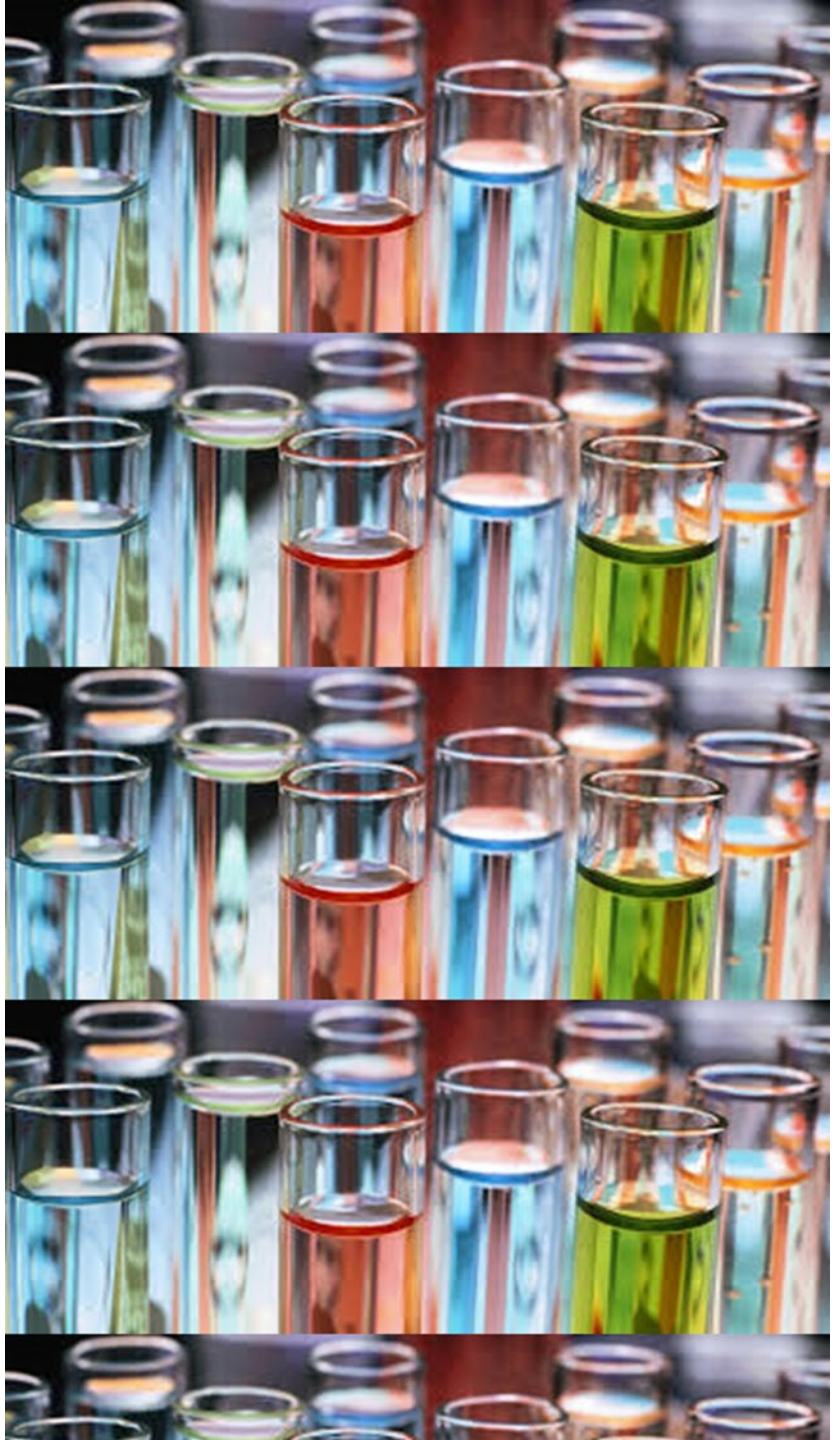
DISCLAIMER

This presentation reflects the views of the author. It should not be construed to represent FDA's views or policies.

Learning Objectives

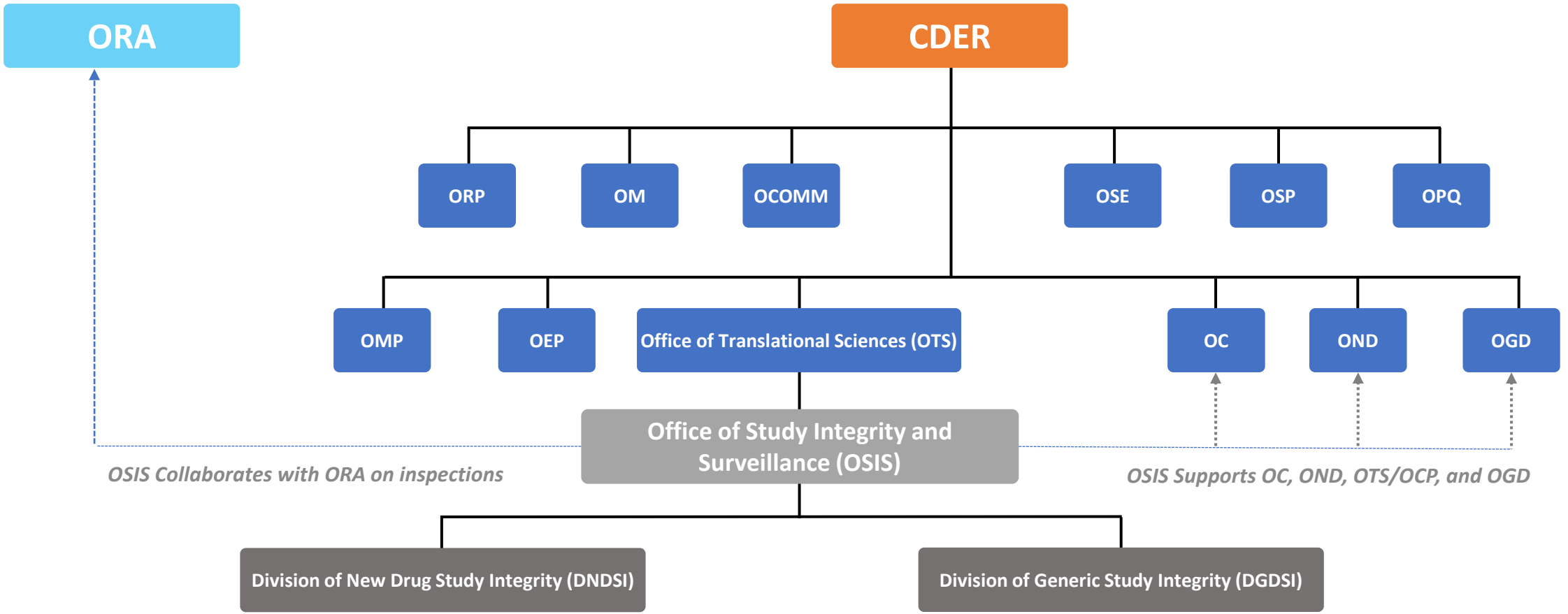
- Describe the mission and vision of the Office of Study Integrity and Surveillance (OSIS)
- Describe the Compliance Programs under the purview of OSIS



Overview

- ORGANIZATION
- OSIS VISION, MISSION, AND ROLES
  - **Select** Sites for Inspection
  - **Inspect** Study Conduct and Data Reliability
  - **Report** on Inspections Through EIRs
  - **Support** Stakeholders with Recommendations and Evaluations

Organization Chart



OSIS Vision

OSIS improves the public health by protecting study subjects and promoting properly conducted studies.

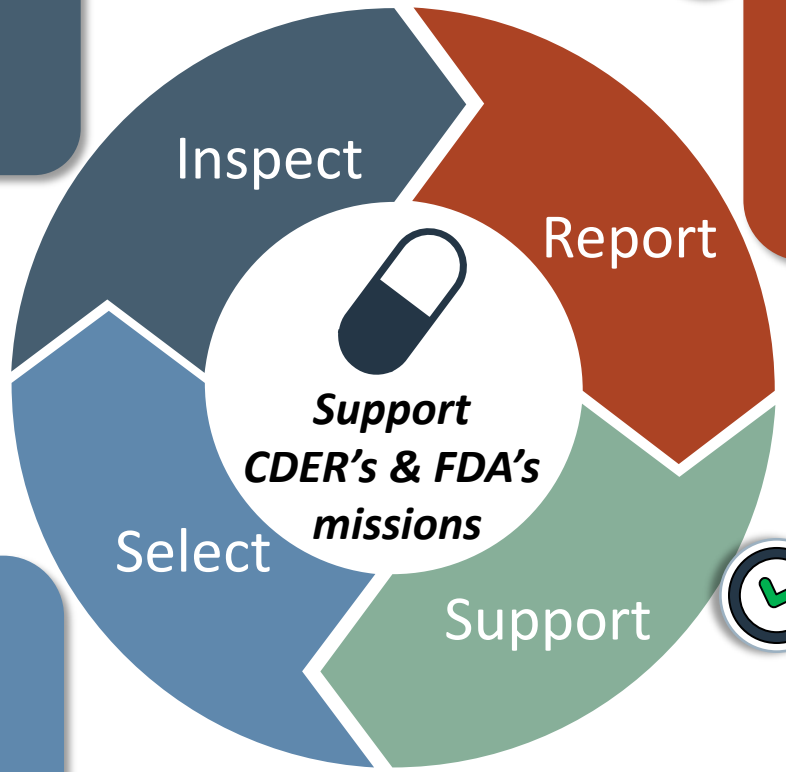
OSIS Mission

OSIS promotes the public health by ensuring the welfare of study subjects and by verifying the quality, study integrity and regulatory compliance of bioavailability/bioequivalence (BA/BE), nonclinical (GLP), and Animal Rule (AR) studies.

OSIS Mission: Select, Inspect, Report, Support

Inspect sites to ensure quality and integrity of studies

Report on inspections by writing Establishment Inspection Reports and EIR Reviews



Select sites for inspection through surveillance evaluation and site assessment

Support CDER with data reliability recommendations and compliance evaluations

OVERVIEW

- OVERVIEW OF OSIS STRUCTURE
- OSIS VISION, MISSION, AND ROLES
  - **Select** Sites for Inspection
    - Inspect Study Conduct and Data Reliability
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Select

Select sites for inspection through surveillance evaluation and site assessment

- Perform bioequivalence study-directed and comprehensive surveillance inspections of firms that conduct pharmacokinetic (PK), bioavailability/ bioequivalence (BA/BE), Good Laboratory Practice (GLP), and Animal Rule (AR) studies

RISK-BASED SURVEILLANCE

- Reliance on firm's overall performance as an indicator for data quality in pending applications
- Risk-based prioritization of inspections/sites
  - Time since last inspection
  - Outcome of past inspection(s) and corrective actions taken
  - Number of pending applications
  - Dates of study conduct in the pending applications compared to those reviewed in previous inspections

RISK-BASED SURVEILLANCE ..continued

- May audit parts of several studies, instead of all aspects of fewer studies

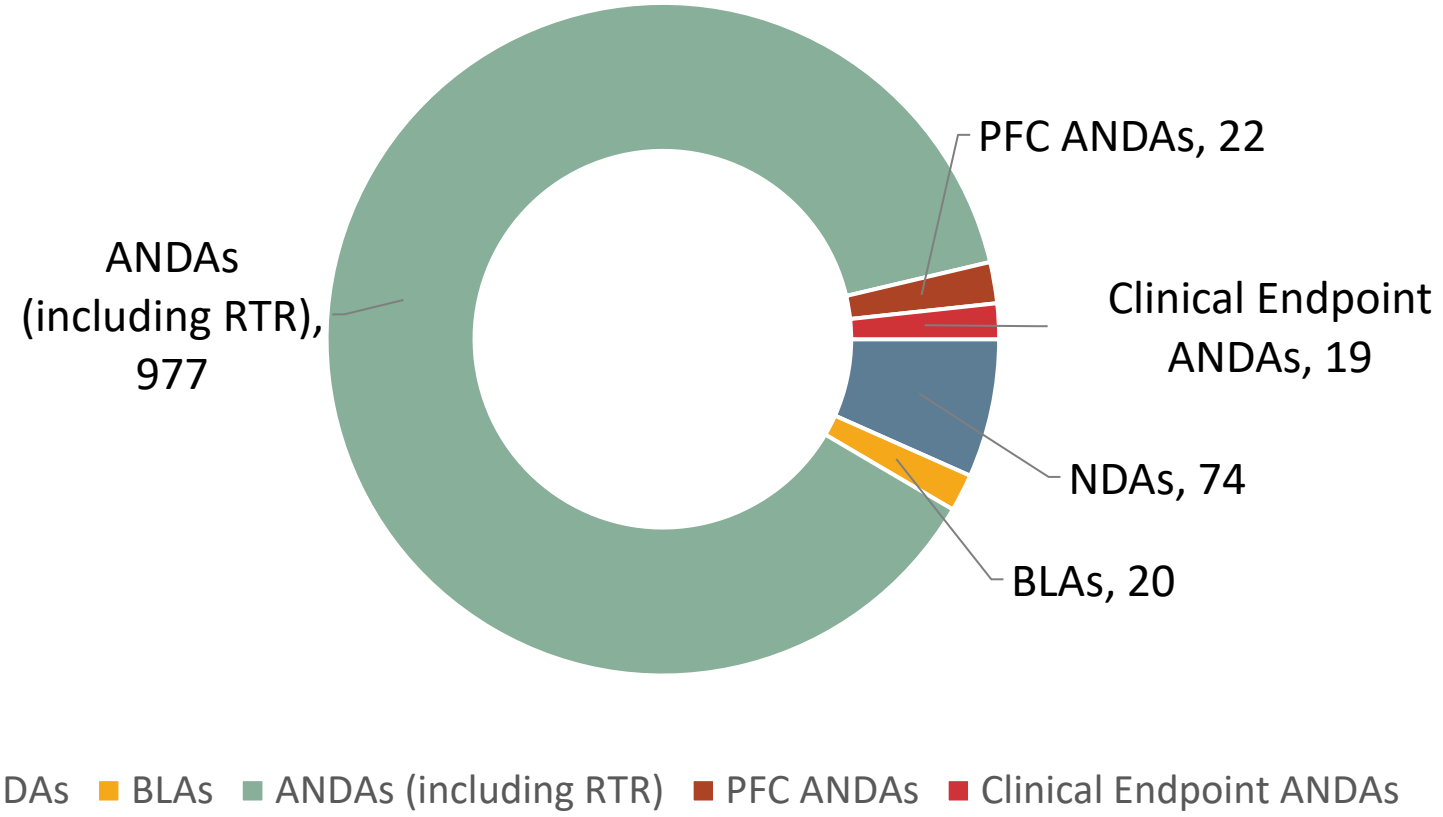
  → gives better overall assessment of firm's performance

- If concerns are identified, evaluate the extent of issues

  → whether limited to a specific study or a systemic issue potentially affecting multiple studies

Conduct Surveillance Evaluation and Site Selection

Site Assessments By Submission Type*



* *Pre-pandemic (2019)*

Total Assessments - 1113

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Inspect

Inspect sites to ensure quality and integrity of studies

- Assign and Conduct inspections in collaboration with Office of Regulatory Affairs (ORA)
- Investigate allegations/complaints of regulatory non-compliance

FDA'S COMPLIANCE PROGRAMS (CPs)

- OSIS relies on Compliance Programs (CPs) to serve as a guide for conducting activities to evaluate industry compliance with FD&C Act and other applicable laws
- CPs provide instructions to FDA personnel for conducting inspections
- CPs are not binding documents; other appropriate alternative approach may be used
- CPs under the purview of OSIS are:
  - In Vivo Bioavailability-Bioequivalence Studies – Clinical 7348.003
  - In Vivo Bioavailability-Bioequivalence Studies – Analytical 7348.004
  - Inspection of Nonclinical Laboratories Conducting Animal Rule-Specific Studies 7348.007
  - Good laboratory Practice (Nonclinical) 7248.808

Reference:
https://www.fda.gov/inspections-compliance-enforcement-and-criminal-investigations/compliance-program-manual/bioresearch-monitoring-program-bimo-compliance-programs

SCOPE OF OSIS INSPECTIONS

- Facilities & Site Operations
- Drug Product & Subject Sample Accountability (storage, handling & processing)
- Reserve Samples
- SOPs, Protocols & Protocol Deviations
- Training Records
- Method Validations & Sample Analysis
- Method Performance
- Audit Trails & Data Security
- Instrument Calibration & Maintenance
- Documentation
- AE reporting, Monitor Reports & IRB/IEC oversight (clinical)

DATA INTEGRITY, QUALITY AND RELIABILITY

Data Integrity

- The completeness, consistency and accuracy of data over its entire life-cycle.
- Documentation needed to reconstruct study events and verify results.
- Data integrity is the cornerstone of FDA's ability to protect the public health

Data Quality

- Study data were collected in accordance with protocols, SOPs, and applicable standards of research.

OSIS reliability recommendation depends on evidence collected during inspections affirming data integrity AND quality.

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Report

Report on inspections by writing Establishment Inspection Reports and EIR Reviews

- Write/review Establishment Inspection Reports (EIRs) and determine regulatory and scientific impact
- Develop and refine strategies to improve inspections planning, execution, evaluation

Report on inspections by writing Establishment Inspection Reports and EIR Reviews

- Establishment Inspection Report (EIR)
  - Written by all participating investigator(s)
  - Includes exhibits that support inspectional findings
  - Submitted to the Center for review and final classification

- Review of EIR
  - Evaluation of the inspection report (EIR) by OSIS reviewer
  - Includes inspectional details, objectionable findings, exhibits, discussion items, and firm's written response to Form FDA 483, if applicable
  - Final classification (NAI, VAI and OAI)

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Support

Support CDER with data reliability recommendations and compliance evaluations

- Provide recommendations to CDER review divisions to support regulatory review and approval decisions
- Collaborate on regulatory actions/enforcement with Office of Scientific Investigations (OSI)
- Collaborate with international regulatory agencies by sharing data, and conducting joint inspections, observed inspections, and training

SUMMARY OF WHAT OSIS DOES?

- Assigns and conducts inspections in collaborations with Office of Regulatory Affairs (ORA) to ensure studies submitted to FDA were conducted properly and data are reliable,
- Writes/reviews Establishment Inspection Reports (EIRs) and determine regulatory and scientific impact,
- Makes recommendations to CDER review divisions to support regulatory review and approval decisions,
- Makes surveillance evaluations of regulated entities conducting BA/BE and GLP studies, and
- Investigates allegations/complaints of regulatory non-compliance,

CONCLUSION

OSIS applies multi-pronged approaches to ensure reliability of data submitted to the Agency as part of the bioavailability/bioequivalence (BA/BE), nonclinical (GLP), and Animal Rule (AR) studies in collaboration with ORA and OSI.

Questions

QUESTIONS

1. Which of the following inspections are covered under OSIS's purview?

a) Inspection of facilities that conduct In Vivo Bioavailability-Bioequivalence Studies – Clinical
b) Inspection of facilities that conduct In Vivo Bioavailability-Bioequivalence Studies – Analytical
c) Inspection of Nonclinical Laboratories Conducting Animal Rule-Specific Studies
d) All the above
e) a and b only

2. Compliance Programs (CPs) serve as a guide for conducting activities to evaluate industry compliance with FD&C Act and other applicable laws

a) Yes
b) No

Thank You