PEER REVIEWED

Veterinary Clinical Studies and Quality Assurance

VICH GL9 GCP[1] is the principle source of guidance for veterinary Good Clinical Practice (GCP)studies; it is from here we take our lead. Quality assurance (QA) in veterinary clinical studies is the responsibility of all study personnel, as defined in VICH GL9 GCP. In the guidance, however, the role of quality assurance staff in veterinary clinical studies is ill-defined. This article gives additional guidance on QA audit.

VICH GCP guidance has been adopted by health authorities, including both the USA's Food and Drug Administration (FDA) and the European Medicines Agency (EMA) for veterinary clinical studies[2,3]. The references to quality assurance and quality audit in the VICH guidance include:

Audit
A systematic and independent examination of study-related activities and documentation to determine whether the study being evaluated is or was properly conducted, and whether the data are or were recorded, analysed and accurately reported according to the study protocol, study-related standard operating procedures (SOPs), GCP and the applicable regulatory requirements.

Good Clinical Practice (GCP)
A standard for the design, conduct, monitoring, recording, auditing, analysis, and reporting of clinical studies. Adherence to the standard provides assurance that the data and reported results are complete, correct and accurate, that the welfare of the study animals and the safety of the study personnel involved in the study are ensured, and that the environment and the human and animal food chains are protected.

Pre-established systematic written procedures for the organisation, conduct, data collection, documentation and verification of clinical studies are necessary to assure the validity of data and to ensure the ethical, scientific, and technical quality of studies. Data collected from studies designed, conducted, monitored, recorded, audited, analysed and reported in accordance with this guidance can be expected to facilitate the review process, since the regulatory authorities can have confidence in the integrity

of studies which follow such pre-established written procedures.

The assurance of quality of every aspect of the study is a fundamental component of sound scientific practices. The principles of GCP support the use of QA procedures for clinical studies. It is perceived that the sponsor would be the party responsible for the QA functions for these studies. All participants in clinical studies are encouraged to adopt and adhere to generally recognised sound QA practices.

Quality Assurance (QA)
A planned and systematic process established to ensure that a study is performed and the data are collected, documented (recorded) and reported in compliance with this guidance and the applicable regulatory requirements.

Permit monitoring and quality auditing of a clinical study (requirement of the investigator).

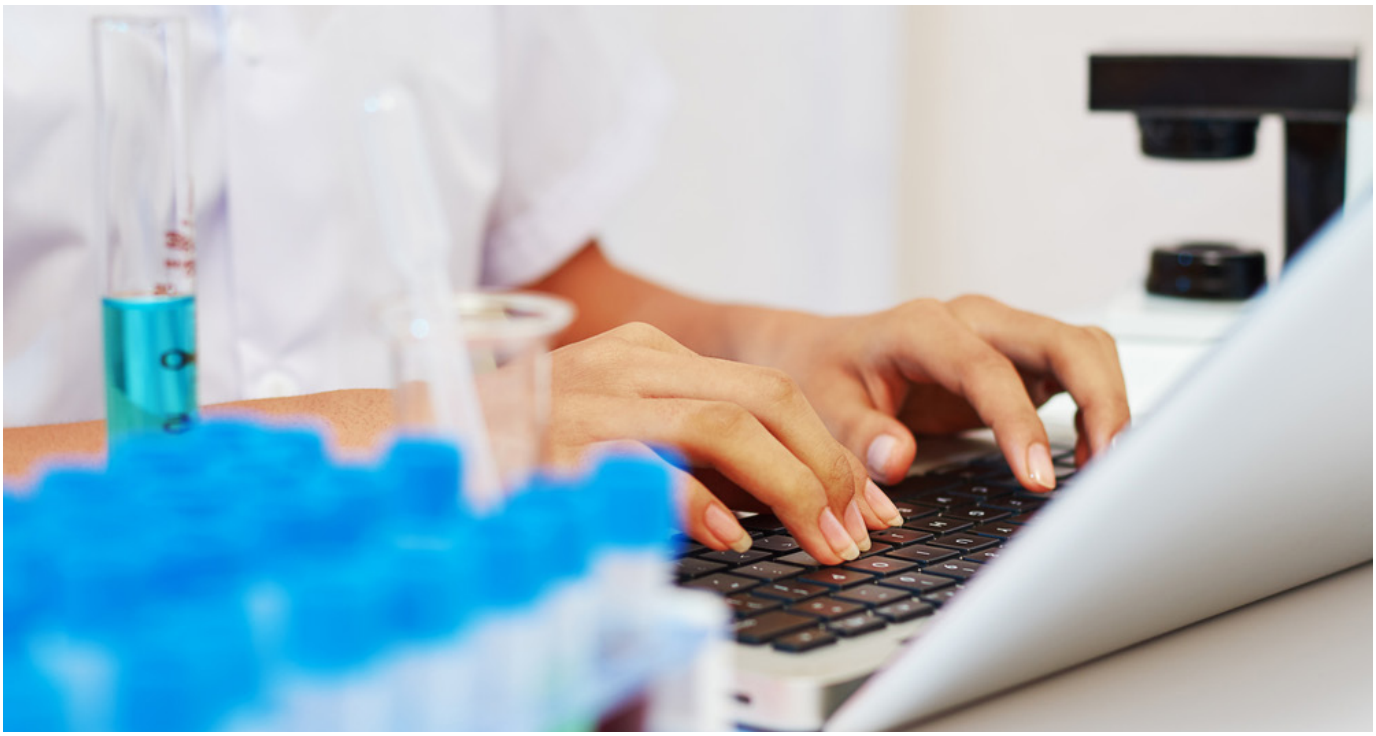
Ensure the quality and integrity of data from clinical studies by implementing quality audit procedures that are consistent with well-recognised and accepted principles of quality assurance (requirement of the sponsor).

Audit certification by auditor, consisting of the dates of site visits, audits and when reports were provided to the sponsor.

Study documentation should be audited by the sponsor's quality audit procedures, consistent with well-recognised and accepted principles of quality assurance. When a quality audit is conducted, the auditor should prepare a report for the sponsor which details the auditing process and which certifies that the audit has been conducted.

It is the sponsor's responsibility, either person or institution, to ensure appropriate QA audit activities are undertaken for a clinical study according to pre-written approved SOPs. An audit is an activity independent of the management of the study, hence the role for QA personnel.

Well-recognised and accepted principles of quality assurance audit will include protocol, investigator site and



final study report audits. The numbers and scope of audits for GCP studies will be defined in the sponsor SOPs. Audit procedures will ensure a risk-based approach, focusing resource where most critically required. In a clinical study where electronic document capture (EDC) is used, QA may undertake audit of the study-specific EDC qualification, that is the user acceptance testing or performance qualification, before initiation of the study.

Audit certification, a signed document by QA providing a listing of the audits undertaken and the dates of reporting by QA to the sponsor, is included in the final study report.

In veterinary clinical studies, the study monitor has the overall responsibility to ensure the study is conducted according to VICH GCP, the study protocol and study procedures. The role of QA includes assuring the sponsor that the monitor is undertaking their role correctly and fully.

Reference is provided here to the regulated inspection metrics for the EMA[4] (a dated but useful summary) and the UK Medicines and Healthcare Regulatory Agency (MHRA)[5] human clinical study inspection metrics. The only agency undertaking routine audit inspections of veterinary clinical studies is the FDA and inspection metrics are not provided. The findings in veterinary clinical studies will generally follow the observations in human clinical studies and reference is provided to give guidance. The critical categories of observation in human clinical studies include:

- Lack of compliance to the study protocol
- Deficiencies in study monitoring
- Issues in the final study reporting, including lack of integrity with the collected study data
- Data integrity, including deficiencies in data recording

Conclusion

From the regulatory perspective, VICH GCP is singularly unhelpful with regard to the detail of QA activities in veterinary clinical studies. A trained and experienced quality auditor can add value, through audit, focused on study compliance in areas of clinical importance. To determine the level of audit for your facility, look to the practices of other organisations and assess standards to benchmark where available. The Research Quality Association, Animal Health Committee and the Society of Quality Assurance Animal Health Speciality Section provide useful information. These organisations have provided information, articles and papers on veterinary QA activities.[6,7]

REFERENCES

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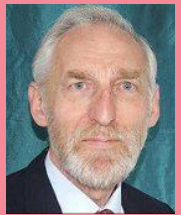

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