

Roles & Responsibilities of the Sponsor

Sponsored by
Center for Cancer Research
National Cancer Institute



Objectives

Funding for clinical research comes from the federal government or the private sector. In addition to providing financial resources, some funding groups also provide the investigational agent. They are referred to as the Sponsor and are responsible for the initiation and management of a new agent under the FDA's Investigation New Drug (IND) Application (Title 21 Part 312). This module will review the role of the IND sponsor.

At the conclusion of this module, you will be able to:

- Define what is meant by a "sponsor"
- List the 4 broad areas of sponsor responsibilities
- Describe the purpose of FDA Form 1571
- List 5 items that are submitted with an initial IND application

Who is a Sponsor?

- The sponsor can be:
 - Individual
 - Pharmaceutical company
 - Government agency
 - Academic institution
 - Private organization
 - Other organization



Definition of Sponsor....

- "An individual, company, institution or organization which takes responsibility for the initiation, management, and / or financing of a clinical trial." (ICH)
- "A person who takes responsibility for and initiates a clinical investigation. ... The sponsor does not actually conduct the investigation unless the sponsor is a sponsor-investigator." (CFR)

....Definition of Sponsor

- In general, the sponsor is the commercial manufacturer that has developed a product in which it holds the principal financial interest
- Holds the IND (Investigational New Drug) application and files the NDA / BLA (New Drug Application/Biological Licensing Application)

Sponsors Responsibilities: 4 Broad Areas

- Preclinical / non-clinical
- Manufacturing
- Clinical
- Post-approval
- May use a CRO (Contract Research Organization)



Preclinical Goals

- Find a product
 - Pharmacological activity
 - Reasonably safe
- Conduct pre-clinical studies
 - animal pharmacology, toxicology, and carcinogenicity

Preclinical Studies

Purposes of PRECLINICAL studies are to:

- Determine the optimal formulation of the product
- Select an initial safe starting dose for human trials
- Identify potential target organs of toxicity
- Recommend appropriate types of clinical monitoring

Manufacturing Responsibilities

- Obtain manufacturing information:
 - Characterization of the product
 - Preliminary stability studies



Clinical Responsibilities

- Submit & maintain Investigational New Drug Application (IND) with FDA
- Conducting Phase 1, 2, 3 Clinical Trials
- Submit New Drug Application (NDA) to FDA for drugs
- Submit Biological License Application (BLA) to FDA for biologics

Investigational New Drug Application (IND)

- Sponsor submits to the FDA
- Descriptive notification of intention to conduct clinical studies with an investigational drug or biologic
- Allows for transportation of product (non-approved drug) across state lines

IND Sections

- [FDA Form 1571](#)
- Table of contents
- Intro statement
- General
- Investigator's Brochure (IB)
- Clinical protocols
- CMC (chemistry manufacturing and control) data
- Pharmacology & toxicity data
- Previous human experience
- Additional information

FDA Form 1571 page 1

Submitted with the initial IND submission and each subsequent submission to the IND

FDA Form 1571 page 2

The FDA has 30-days to review the protocol. FDA will not contact sponsor if all is OK to proceed, only if a "hold" is needed.

Conducting Clinical Trials

- Selecting qualified investigators and monitors
- Informing Investigators
- Reviewing ongoing studies
- Record keeping and record retention
- Ensuring the return or disposition of unused investigational drug supplies

Investigator Selection

- Assess qualification of PI and Sub-investigators
 - Qualified by training & experience
 - Ability to supervise administration of product
 - Investigational Product shipped to them
- Assess site (physical plant capabilities).
Examples:
 - Is there adequate pharmacy space for drug storage?
 - Are there SOPs for freezer alarms?



Informing Investigators

- All investigators must be fully informed of investigational product research findings
 - Investigator Brochure
 - Reprints / published articles
 - Reports / letters to investigators
 - IND Safety Reports



You've Got Mail

Review Ongoing Investigations...

- Investigator compliance - is conducting the study in compliance, with the protocol, with the Federal Regulations, and with GCP?
- Is there unreasonable & significant risk to the study subjects?
- Monitor clinical trial conduct
- Medical Monitor - individual responsible for the development and oversight of all clinical trials in a portfolio of study agents



...Review of Ongoing Investigations...

- Review and evaluate
 - Safety and effectiveness data
- Provide FDA
 - Annual reports
 - Summary of accrual statistics, safety, toxicity and efficacy data, as well as ongoing non-clinical and manufacturing progress



Potential Actions for Non-compliance

- Secure compliance
- OR
- Stop product shipments to the investigator
- Terminate the investigator's participation in the study
- Secure return or disposal of investigational product



Actions for Unreasonable and Significant Risk

- Stop clinical trial: permanent vs. temporary
- Notify the FDA, all IRBs, all investigators of the risk(s)
- Assure the disposition of all outstanding product or resume trial with amendment
- Provide FDA full report on actions taken



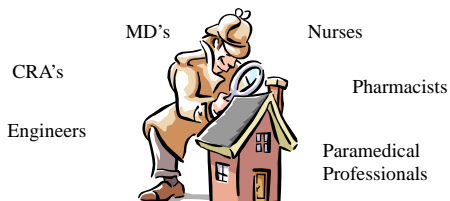
Monitoring of Clinical Trials...

- Monitoring function may be performed by:
 - The sponsor
 - Contract staff



...Monitoring of Clinical Trials...

Sponsor may designate 1 or more appropriately trained and qualified individuals from various backgrounds to monitor the trials



...Monitoring of Clinical Trials

- Sponsor must have written monitoring procedures (SOPs) to assure the quality of the study and ensure that each person involved carries out their duties
- SOPs should include:
 - How often will visits occur
 - Who will attend
 - What will be reviewed
 - How will problems be resolved
 - Communication flow



Record Retention Requirements

(21 CFR 312.57 and 21 CFR 312.62)

- Applies to investigational drug records, investigator financial interest records, and patient case histories (medical record and case report forms)
- Retain records and reports for 2 years after a marketing application is approved for the drug
- If NDA application is not approved, retain records and reports until 2 years after shipment and delivery of the drug for investigational use is discontinued and the FDA has been so notified



Disposition of Unused Drug

- Sponsor must ensure the return or destruction of all unused supplies of drug from each investigator



FDA Review of NDA or BLA

- FDA's approval is based on pre-clinical, manufacturing & clinical data in the NDA or BLA
 - Good Laboratory Practice (GLP)
 - Good Manufacturing Practice (GMP)
 - Good Clinical Practice (GCP)

Resources

- Code of Federal Regulations, Title 45 Part 46: Protection of Human Subjects
- Food and Drugs: Title 21
 - 21 CFR 312: IND Application
 - 21 CFR 314: NDA application
- Guidelines for Good Clinical Practice. International Conference on Harmonisation (ICH)

Evaluation

Please complete the [evaluation form](#) and fax to Elizabeth Ness at 301-496-9020.



For questions, please contact Elizabeth Ness
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