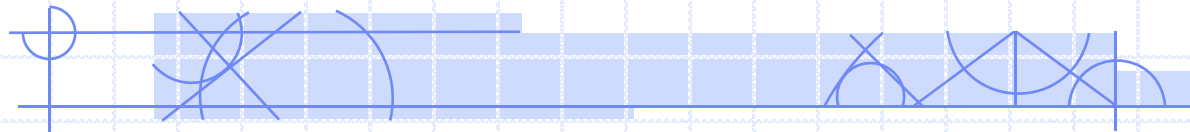




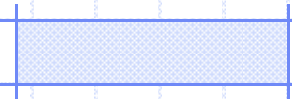
Good Laboratory Practices (GLPs)



An Overview

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What are GLPs?

- In the 1970s, FDA inspections of nonclinical laboratories revealed that some studies submitted in support of the safety of regulated products had not been conducted in accord with acceptable practice, and that accordingly data from such studies was not always of the quality and integrity to assure product safety.

What are GLPs?

- As a result of these findings, FDA promulgated the **Good Laboratory Practice (GLP) Regulations, 21 CFR Part 58**, on December 22, 1978 (43 FR 59986). The regulations became effective June 1979.
- The regulations establish standards for the conduct and reporting of nonclinical laboratory studies and are intended to assure the quality and integrity of safety data submitted to FDA.

GLPs: When?

- The FFDCFA and Public Health Service Act require that sponsors of FDA-regulated products submit evidence of their product's safety in research and/or marketing applications.
- These products include food and color additives, animal drugs, human drugs and biological products, human medical devices, diagnostic products, and electronic products.

Value of GLPs

FDA uses these data to answer questions regarding

- The toxicity profile of the article.
- The observed no adverse effect dose level in the test system.
- The risks associated with clinical studies involving humans or animals.
- The potential teratogenic, carcinogenic, or other adverse effects of the article.
- The level of use that can be approved.

GLPs Protect Public Health

- The importance of nonclinical laboratory studies to FDA's public health decisions demands that they be conducted according to scientifically sound protocols and with meticulous attention to quality.

GLPs: Documented Data Driven Decisions

- FDA relies on documented adherence to GLP requirements by nonclinical laboratories in judging the acceptability of safety data submitted in support of research and/or marketing permits.
- FDA has implemented a program (BIMO) of regular inspections and data audits to monitor laboratory compliance with the GLP requirements.

GLPs: Who must do them?

Physicians and other qualified experts ("clinical investigators") who conduct these studies are required to comply with applicable statutes and regulations intended to ensure the integrity of clinical data on which product approvals are based and to help protect the rights, safety, and welfare of human subjects.

What are the minimum requirements for conducting a GLP study?

- **At a minimum, GLP compliance requires the following:**
 - A **Study Director**, appointed by the institution, who acts as the single source of study control and assures that the protocol is approved and followed, that all experimental data are recorded, that GLPs are followed, and that all raw data, documentation, protocols, specimens, and final reports are archived as required.

What are the minimum requirements for conducting a GLP study?

- An independent **Quality Assurance Unit**
 - assures management that facilities, personnel, practices and records are in compliance with regulations,
 - maintains a master schedule sheet of studies,
 - inspects each nonclinical study at intervals to assure compliance and reports findings to the Study Director and management,
 - reviews the final report to assure that it accurately reflects the raw data,
 - and prepares and signs a QA statement in the final report.

What are the minimum requirements for conducting a GLP study?

- **At a minimum, GLP compliance requires the following:**
- **Standard Operating Procedures** (Any deviations from these SOPs must be authorized and recorded by the Study Director)
 - equipment use, maintenance, and calibration;
 - for laboratory tests and methods;
 - animal use issues such as identification, care, transfer, and necropsy;
 - histopathology;
 - handling test and control articles;
 - data handling and storage.

What are the minimum requirements for conducting a GLP study?

- **At a minimum, GLP compliance requires the following:**
 - A written protocol for each study that describes the objectives and methods for the conduct of the study.
 - All data recorded in ink, dated, and initialed.
 - Separate laboratory and animal facilities.
 - Final report containing a compliance statement signed by the applicant, the sponsor, and the Study Director

GLPs at MSU: Not at this time

- Since the Office of Laboratory Animal Resources (MSU) and the Laboratory Animal Resources and Care (LARAC) unit at the College of Veterinary Medicine do not incorporate GLP methods into standard animal care, results obtained at this time in animal studies at this University cannot be described as GLP compliant and should not be so described in applications to the FDA.
- Additionally, because there is no independent QA unit to audit the laboratories and records of a GLP study, conduct of GLP studies at MSU should not be permitted at this time.

Warning Letter to Case Western Reserve University

- **Failure to provide adequate testing facility management (21 CFR 58.31 (a), (c), (f))**
- **Failure to provide adequate study direction (21 CFR 58.33).**
- **Failure to have a Quality Assurance Unit (21 CFR 58.35).**

Warning Letter to Case Western Reserve University

- **Failure to maintain study documentation and to store materials in an orderly manner for expedient retrieval [21 CFR 58.190]**
- **Failure to maintain records for the maintenance and calibration of equipment [21 CFR 58.63 (a)].**

Warning Letter to Case Western Reserve University

- Within 15 working days after receiving this letter please provide written documentation of the specific, additional steps you have taken or will take to correct these violations and prevent the recurrence of similar violations in current and future studies. The submitted corrective action plan must include projected completion dates for each action to be accomplished.
- Failure to respond to this letter and take appropriate corrective action could result in the FDA taking regulatory action without further notice to you