

www.arc-regulatory.co.uk



From lab to life



Partnering with ARC to Accelerate your CDx Programmes

SELECT

IVD/Laboratory vendors based on your specific needs and identify the right solution for your clinical use case.

ACCELERATE

- Protocol development including Statistical Analysis Plan and data analysis
- Time sensitivity site set-up and study initiation
- Reporting and BIMO inspection readiness

MONITOR

- Global IVD study sites
- Study compliance with local and global GCP requirements

PREPARE

- Study protocol, essential documents and reports for compliance with global regulations (e.g. IVDR)
- GCP for medical device studies (ISO 14155 and 20916)
- GCP/Regulatory training to comply with all requirements

What we do

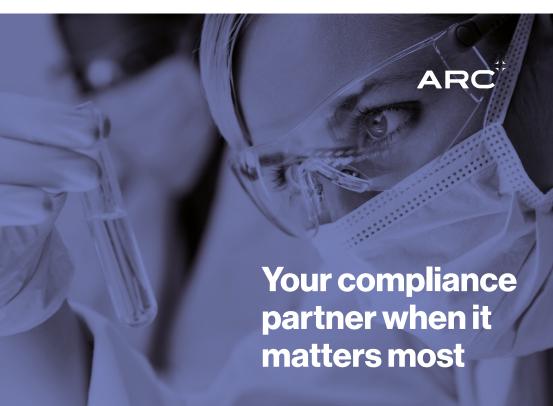
ARC is a niche provider of clinical research and regulatory compliance solutions, supporting Pharma and Biotech partners in their precision medicine development.

The Niche Advantage

- Extensive international experience (Specialized Service Provider in IVDR)
- Agile (Improves Clinical Quality and Outcomes)
- Flexible (Day One Readiness)
- Turnaround time (White Glove Treatment)

In the last 5 years, ARC Regulatory has completed 141 projects for 35 clients ranging from blue chip clientele to start-up companies requiring regulatory, clinical, and quality support from across the globe.

ARC has completed over 400+ site monitoring visits for IVD studies with the vast majority related to diagnostics.





ARC Regulatory – Partnering to ease the Regulatory Journey

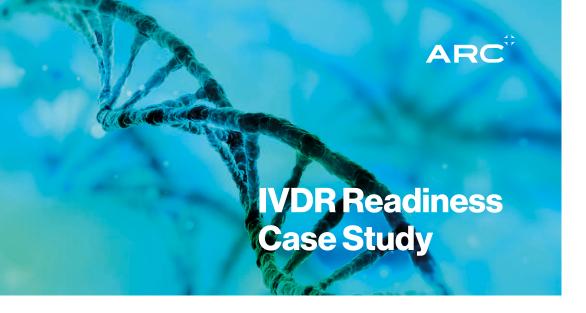
- Regulatory strategy development from feasibility to market approval
- Regulatory submissions and submission strategy:
 - identify requirements for IVD/CDx study and market submissions
 - collate submission packages
 - submit on behalf of sponsor or manufacturer and act as EU legal representative
- DHF/Technical documentation review and remediation
- Medical Writing IVDR Performance Evaluation documents, IVD/CDx documentation (including protocols, investigator brochures, etc) and scientific literature reviews

ARC Clinical – Helping your Therapies reach their Target

- Full service CRO for IVD/CDx studies
- Global site monitoring with regional CRAs in US, EU and Asia, including site set-up and initiation, monitoring and close-out activities
- Essential document tool-kit and template development, including monitoring plan, data management plans, logs, trackers and study binders
- EDC and eTMF
- Clinical strategy and study protocol development
- Ensure compliance with GCP and regulatory requirements in both a local and global context

ARC Quality – Your experts in IVD QA & Research Compliance

- Auditing services BIMO preparation and mock audits, GCP, GMP, Software development and general vendor due diligence (e.g. auditing of CDx vendor manufacturing and testing site)
- Gap assessment and remediation support
- Expertise and experience with:
 - ISO 13485
 - 21 CFR Part 820
 - ISO 14971
 - GCP (21 CFR 812 & ISO 20916)
 - IEC 62304
 - IVDR (EU) 2017/746) transition



Problem Statement

Pharma Sponsor "A" wish to use an already CE-marked device (IVDD) to identify patients who are likely to benefit from their investigational medicinal product in their global phase II trial; however, the use of the device in the clinical trial falls outside of the scope of its intended use.

The assay will be implemented in a US-based central laboratory (after 26th May 2022), where all patient samples, including EU patients, will be tested with the device. An archival tissue sample will be used where available, otherwise an FFPE sample will be collected from the patient. A venous whole blood sample will also be taken from all patients to test an exploratory hypothesis around the ability of a reflex assay to identify, retrospectively, the biomarker status in ctDNA.

The Ask from ARC

Pharma Sponsor "A" wanted to work with ARC to understand and comply with their responsibilities as Sponsor of the in vitro medical device clinical performance study.

ARC's Project Approach

ARC's team of highly experienced regulatory consultants identified the best regulatory strategy for Pharma Sponsor "A", taking into account the IVD (CDx) intended purpose in the IMP trial, central testing site, clinical trial sample collection sites, and competent authorities involved.

As the European patient samples were to be shipped to a US central lab for testing, the device must comply with the IVDR as per Article 6 (Distance Sales). Since the device is not approved for the intended use in the IND/IMP trail, then it is subject to Article 70(2) (Performance studies regarding devices bearing the CE marking) and subsequently, the requirements of Article 58 for an interventional performance study.

Our Solution

We conducted a systematic, independent gap analysis to identify those areas of documentation, procedures, and processes which needed to be revised/updated for compliance to the In-Vitro Diagnostics Regulation.

We performed a review of:

- Current CE Mark Technical File
- Current device classification based on the intended purpose in the IND/IMP trial
- Risk Management File
- Performance Evaluation Plan (PEP)
- Device Labelling
- Clinical Performance Study Protocol, Investigator Brochure and related essential documents
- Post-market surveillance (process, plan, effectiveness, PMPF, and results)
- ARC provided access to internal QMS procedures from our IVD CRO subsystem
 that cover Sponsor requirements, so that our Pharma Sponsor could quickly
 achieve compliance to IVD study requirements without the need to amend their
 own QMS.

ARC also looked at the evidence of compliance with the General Safety and Performance Requirements (GSPR) and data supporting their performance evaluation documentation such as scientific validity, analytical performance and existing clinical performance data. A thorough report explaining where Pharma Sponsor A failed to comply with IVDR was provided.

ARC worked with the IND/IMP trial CRO to collate timelines, co-ordinate protocol submissions and align on country readiness for site activation and patient enrolment, as well as leverage pre-existing REC relationships to co-ordinate ethics submissions and approvals.

We compiled the Annex XIV applications and acted in the role of EU legal representative for the performance studies, which were submitted to the National Competent Authority of each member state concerned for approval in accordance with Article 58 of the IVDR. Submission to independent research ethics committees was also provided.

ARC conducted pre-qualification and site initiation visits for the central testing laboratory, activated the IVD device study site, monitored the study in accordance with our risk-based monitoring procedures and provided study management expertise from our clinical operations team.

Project Outcomes

- Pharma Sponsor "A" were able to quickly achieve compliance with their Sponsor/ manufacturer obligations without having to amend or supplement their own processes, or hire additional staff to manage a device study
- Delays to study approvals and site activations were minimised
- The study is being ran in compliance with GCP and IVDR requirements, and is being monitored by our expert team of CRA's who have conducted in excess of 450 CDx monitoring visits globally

ARC Clinical Trial Solutions





ARC Services



Early Phase Team:

Translational Biomarker Expert Team

Scientific Support:

- Assay Design
- AV Study Design
- AV Support (reviews)
- Assay Development Support;
- Molecular (PCR/NGS)
- Immunoassays
- Proteomics etc.

Regulatory Support:

- Global RI
- Study approval submission(s)
- IRB/REC Submissions
- RMF
- UE File
- Gap Assessment

Clinical Support:

- Site Selection/Due Diligence
- Device Study Design
- Capability Assessment
- CPM

Late Phase Team:

Registrational CDx Expert Team

Scientific Support:

- Validation pre-submissions
- Final AV study design
- Scientific Meeting Support
- PMA/CAP review deficiency support etc.

Regulatory Support:

- Global RI
- Marketing approval submission(s)
- REC/IRB Submissions
- RMF
- UE File
- Gap Assessment

Clinical Support:

- Site Selection/Due Diligence
- Device Study Design
- Capability Assessment
- CPM

Full Service CRO Team

Scientific Support:

- Validation pre-submissions
- Final AV study design
- Scientific Meeting Support
- PMA/CAP review deficiency support etc.

Regulatory Support:

- Global RI
- Study approval submission(s)
- REC/IRB Submissions
- RMF
- UE File
- Gap Assessment

Clinical Support:

- Site Selection/Due Diligence
- Device Study Design
- Capability Assessment
- CPM
- Data Management
- Biostats

Regulatory Team:

Strategy, Submissions and Global Insights

Regulatory Team:

- Global regulatory intelligence (RI)
- ARC360 Maintenance and support
- Marketing approval submission(s)
- Study Approval Submission(s)
- REC/IRB Submissions
- Performance Evaluations (IVDR)
- Medical Writing
- Risk Management File (RMF)
- Usability Engineering (UE) File
- Gap Analyses
- Regulatory training
- Regulatory Compliance (e.g. IVDR, 21 CFR 812)

Quality Team:

Clinical Compliance and Auditing

Quality Team:

- Project audits
- Study audits
- QMS Gap Assessments
 & Remediation
- QMS SOP development
- GCP due diligence
- Inspection Preparation e.g. BiMO

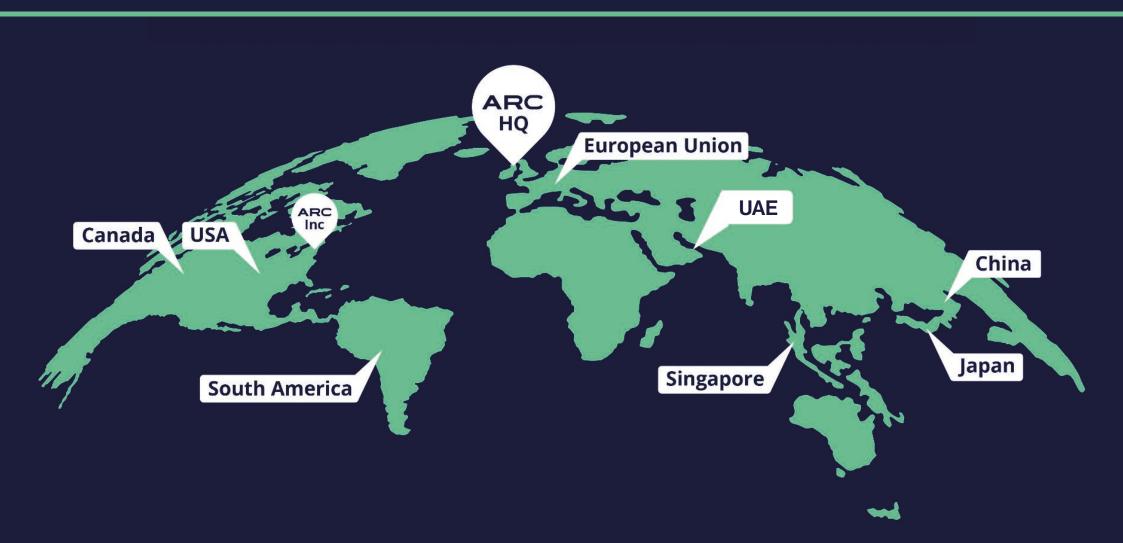
Project Management, Alliance Management

Study Monitoring, CTA

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GLOBAL NETWORK



Your 24/7 Digital Regulatory Solution

ARC360 Regulatory Navigator ARC360 Regulatory Navigator Includes;

- 24/7 Access to ARC360 platform
- Up to date, difficult to source, real time regulatory information for biomarker diagnostics and precision medicine trials
- International Contact and Regulatory information for Central Laboratory locations
- Access Global Regulatory Information for Sample Collection Sites
- SME consulting options (depending on package)
- Email Support





ARC360 Laboratory Toolkit ARC360 Lab Toolkit Includes;

- 24/7 Access to ARC360 Platform
- Online "IVDR Laboratory Toolkit" Training for Labs and Health Institutions
- Custom-made templates for your IVD/CDx studies such as GSPR Checklist, Risk Management, ISO13485 and more
- SME consulting options (depending on package)
- "Confirm your Knowledge" Tests for applicable modules
- Email Support

