



FONDAZIONE
PER LA RICERCA FARMACOLOGICA
GIANNI BENZI
ONLUS

December 10th, 2021
Virtual meeting

**XIV FORESIGHT TRAINING
COURSE**
*The health emergency: regulatory
crash and future perspectives*

Decentralized Clinical Trials: strengths and weakness of safety management

Mariagrazia Felisi

Consorzio per Valutazioni Biologiche e Farmacologiche

Fondazione per la Ricerca Farmacologica Gianni Benzi onlus

Via Abate Eustasio, 30 – 70010 Valenzano (BA) Tel.: +39 080 2052499

www.benzifoundation.org

- How clinical trials changed during the pandemics
- Overview on Decentralised Clinical Trials
- Safety monitoring in DCT
- Conclusions

A tsunami overwhelmed us ...



31 Dec-2019: A new Coronavirus was identified in Wuhan (China)

21 Feb-2020: First confirmed case of SARS-CoV-2 in Italy

11 Mar-2020: the WHO declared a global pandemic

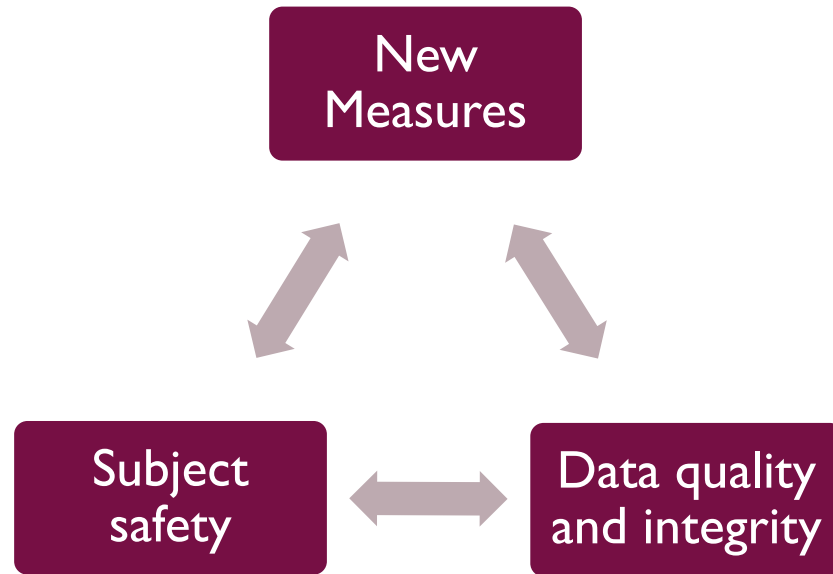
20-Mar-2020: Guidance to sponsors on how to manage clinical trials during the COVID-19 pandemic (4 February 2021 v4)

“Behind every problem there is an opportunity”

(Galileo Galilei)

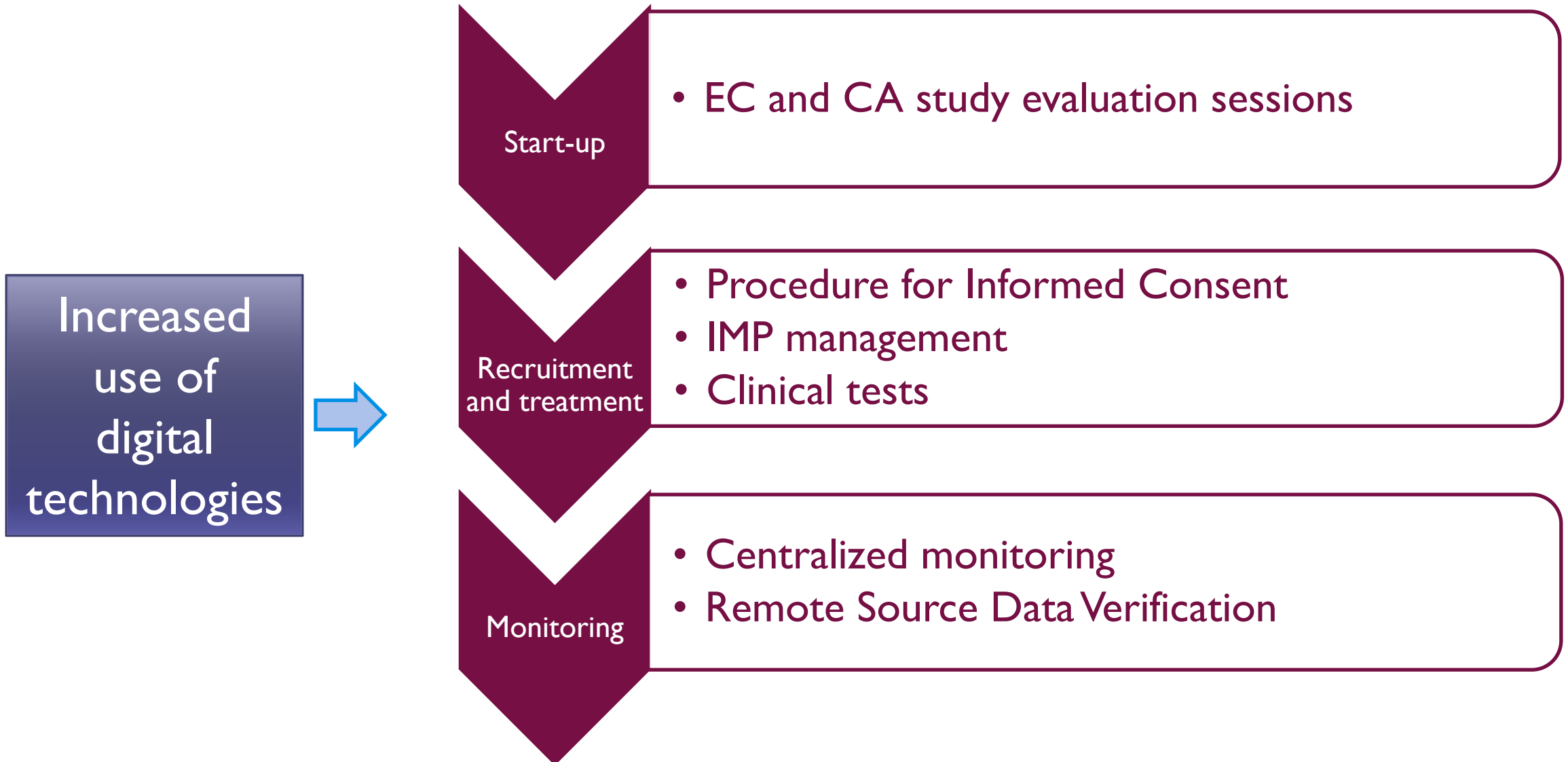
Pandemic experience has accelerated the use
of **innovative technologies** in the clinical
research

EMA Guidance to sponsors on how to manage clinical trials during the COVID-19 pandemic



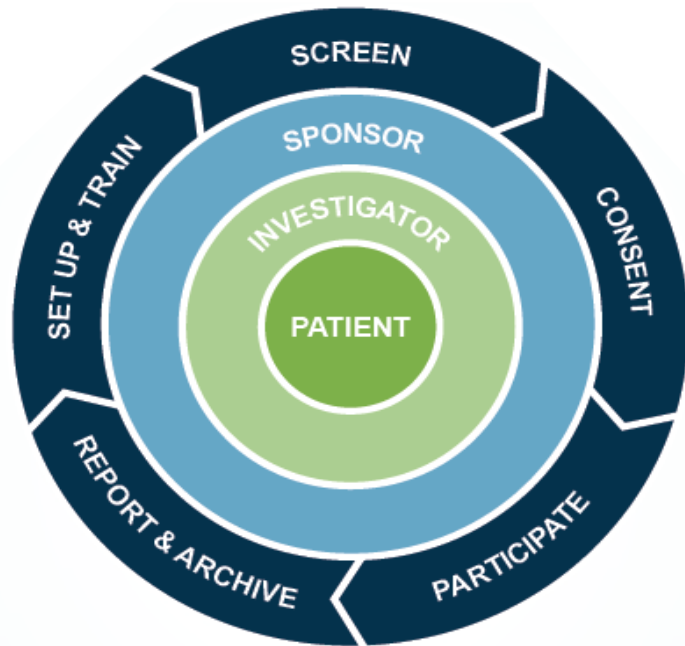
- Where a trial participant is unable to attend the site, **other measures may be required.**
- However, the **limitations and risks of such methods** should be taken into account.

Clinical trial activities during the pandemic according the EMA Guidance



The pandemic has highlighted the possibility of decentralizing specific elements of clinical research that can work even in a "non-pandemic" situation and could become the "standard" moving forward

Decentralized Clinical Trial

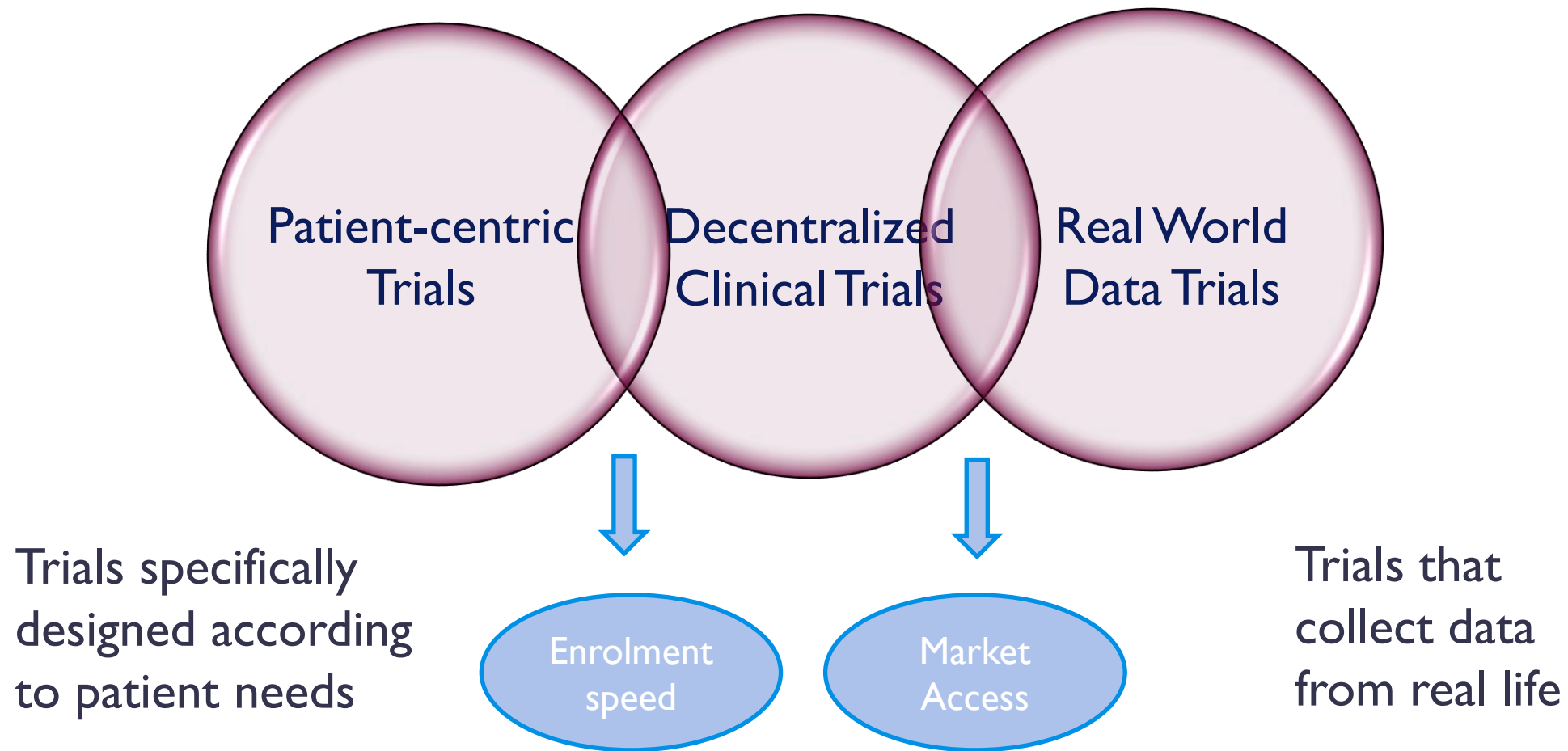


*“Bring the trials to the patient by utilizing local healthcare providers, optimizing **digital health technologies**, and enabling the voice of the patient in order to accelerate medical product development, speed delivery of therapies to patients, and create efficiencies across clinical research processes”*

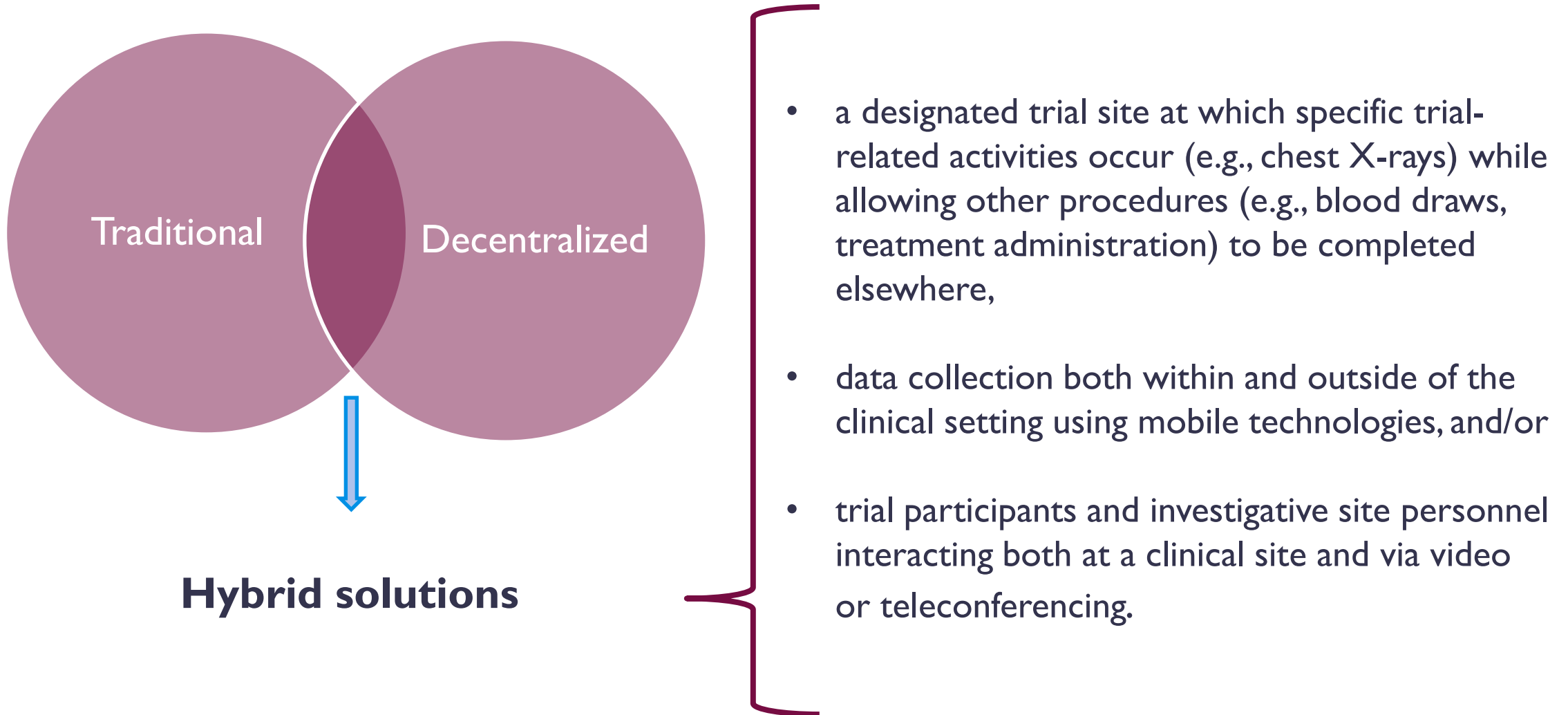
Decentralized Clinical Trials Working Party (ACRO DCT WP)

They are characterized by the use of telemedicine and digital technologies that allow some or all of the testing activities take place outside traditional testing sites

Patient-centric Trials and Real-world data Trials



Partially Decentralized/Hybrid Approaches



Such hybrid approaches can increase trial flexibility

Impact of decentralization on several domains

Consent

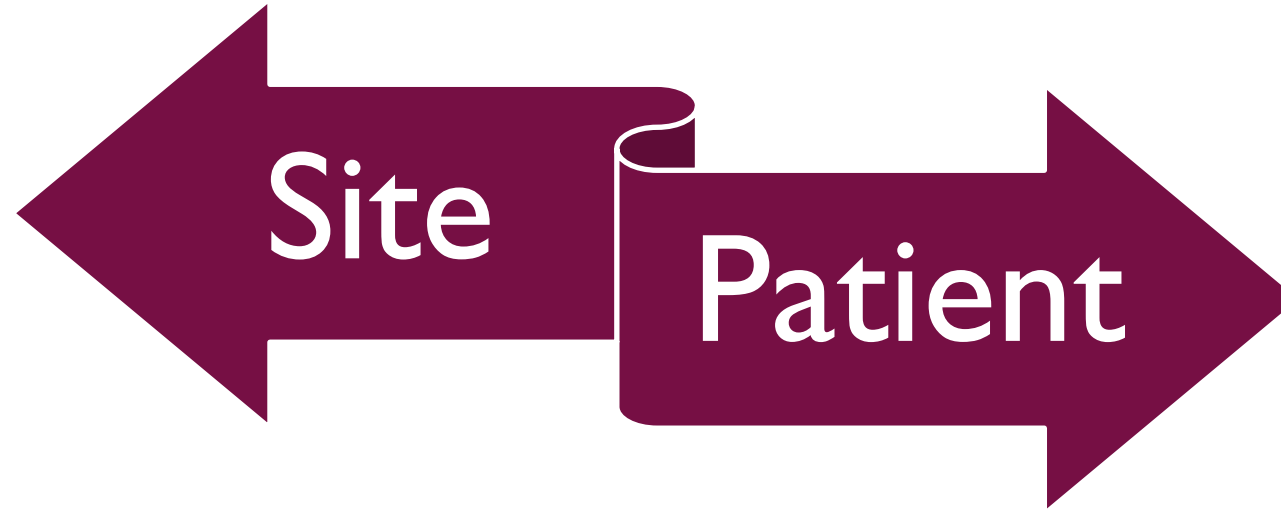
**Safety
Monitoring**

**Site
Monitoring**

**Efficacy
Assessment**

**Delivery of
Treatment**

Safety Monitoring



- Procedures well documented
- Staff well trained
- Escalation plan for safety communication
- Review safety data in timely manner
- Contracts in place to react over distance

- Training and education
- Technological skills

Safety management in DCT

DCT are less suitable for early phase trial or any study using an IMP that does not have an established safety profile



Developing a risk assessment plan should be considered at the beginning of a project's lifecycle, and intermittent project level risk reviews should continue for the course of the trial

DCTs initiatives

Decentralized Clinical Trials

In October 2019, ACRO established the Decentralized Clinical Trials Working Party to examine the barriers to adoption of DCTs and create quality-based principles and tools to facilitate implementation of decentralized clinical trials.

DCT WP provides a set of operational best practices for the implementation of decentralized clinical trials that will be helpful sponsors and research organizations

Thought Leadership on DCTs

ACRO's DCT Toolkit includes four resources: (1) a detailed QbD Manual for DCTs; (2) an accessible, quick-reference QbD Manual; (3) a Risk Assessment Considerations template; and (4) DCT Data Flow Maps. In addition to the DCT Toolkit, ACRO's White Paper provides an overview of key issues in the decentralization of clinical trials

- **ACRO DCT White Paper: A New Quality-by-Design, Risk-Based Framework**
- **Bringing the Trial to the Patient: A Quality-by-Design Manual for Decentralized Clinical Trials**
- **QbD Manual for Decentralized Clinical Trials: The Quick Reference Guide**
- **Decentralized Clinical Trials Risk Assessment Considerations**
- **Decentralized Clinical Trials Data Flow Maps**

[Click Here to Download the Full Template](#)

**Decentralized
Clinical Trials
(DCT) Risk
Assessment
Considerations**

September 2020

DCT Risk Assessment Tool

DCT Risk Assessment Considerations workbook was inspired by TransCelerate Biopharma INC. Risk Assessment Categorization Tool (RACT)

Assessment #	Category	Objective	Assessment Criteria / Questions for Discussion	Considerations	Overall Risk Score			#VALOREI	Category Weighting 0.1 - 1.0 (summary rating only 1.0 is default)	Mitigation Strategies
					Impact	Probability	Detectability	Total Score		
1	General IT and Systems Consideration	Consider connectivity and robust infrastructure of the DCT network			Medium (2)	Medium (2)	Medium to detect (2)	8	1,0	
1,1			Is there a mechanism in place to inform and educate trial participants on a DCT and the process?	Need to evaluate if there is additional burden on the participant for the trial design using technology. How will participants be educated on the use of technology to ensure compliance? What are the training requirements?						Paper back up option for if a device fails
1,2			Is there a mechanism in place to inform and educate site staff on a DCT and the process?	Training requirement, consideration to be made due to the nature of the trial and site performing activities remotely.						
1,3			Is there a mechanism in place to inform and ethics and IRBs on a DCT and the process?	Determine the timing of submissions and what documentation is needed for submissions as this will vary per country.						
1,4			Have all the stakeholders been identified to allow for adequate time to create the appropriate training materials prior to key milestones?	Have Trial participants, sites, sponsors, vendors, ethics committees, couriers, CROs etc been identified and training available for all relevant users pertinent to the process, role and systems being used.						
1,5			Is there an appropriate infrastructure in place to support the DCT based on geography?	Is there an architectural/infrastructural document that provides an overview of the DCT design? Is there appropriate infrastructure to support the DCT based on geography? This could cover on premise, on site, or						
1,6			Is there appropriate documentation that provides an overview of the DCT data flow, collection and overall data strategy?	Requirement for a overall data strategy to support oversight. Requirement for a data flow diagram, considering who owns the data, who can query the data, how investigator retains control and access during and after study conclusion						
1,7			Will there be connectivity issues for the participants and the site?	When might the trial participant need to access the applications, at home, at work or external to the home i.e. need for Wi-Fi and roaming 4G/5G, foreign places.						
1,8			Does the site have sufficient bandwidth and connectivity to manage data and interactions and engagement via remote means for all user?	May need to update bandwidth and connectivity capabilities to manage multiple participants and geographies. Are the systems scalable.						

Advantages

More patients

More data

Faster recruitment

Drop-out decrease

Protocol adherence

Allow for more frequent or continuous clinical data collection

Enable remote participation, reducing need to travel, enhance convenience for trial participants

Facilitate research on rare diseases, reduce burden on caregivers

Concerns

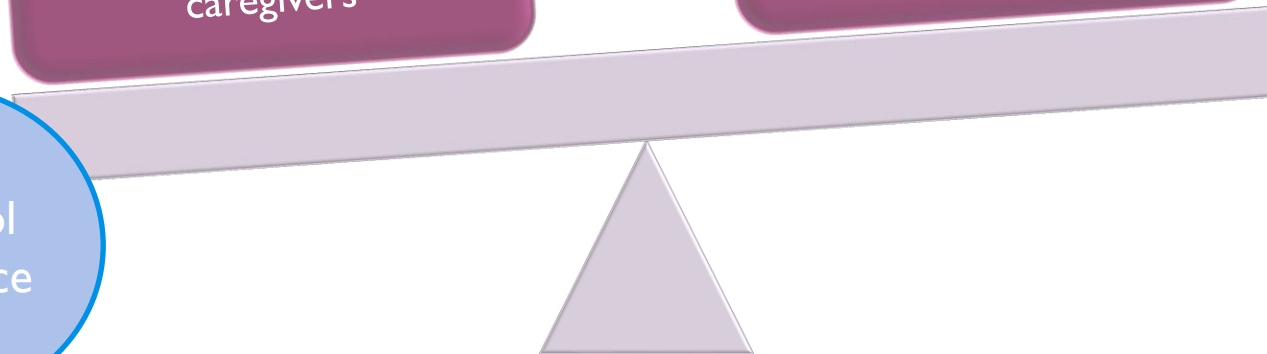
More complexity

Human factor

Selection bias

Lack of sustained relationships with trial personnel may impact retention of trial participants

Exclusion of patients with limited technological skills or living in region with limited connectivity



Conclusions

- We are facing a progressive shift of the various clinical research activities around the patient
- Innovation allows to accelerate the development of a product, speeding up the delivery of therapies to the patient and making clinical research processes more efficient

in the respect of the rights,
safety and well-being of trial subjects



- Hold to the same standard as traditional trials
- Clearly articulate remote safety monitoring procedures and train investigative staff
- Develop protocol-specific safety monitoring and communication escalation plans