

October 19, 2018

# A New Path Forward for Using Decentralized Clinical Trials

Jeffry Florian, FDA CDER Annemarie Forrest, CTTI Penny Randall, IQVIA

#### **Disclaimer**

The views and opinions expressed in this presentation are those of the individual presenter and do not necessarily reflect the views of the Clinical Trials Transformation Initiative.

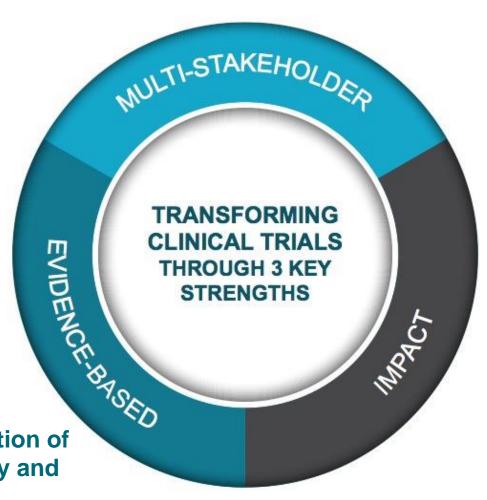


#### **CTTI Strengths**



Public-private partnership
Co-founded by Duke University & FDA
Involves all stakeholders
80+ members

MISSION: To develop and drive adoption of practices that will increase the quality and efficiency of clinical trials





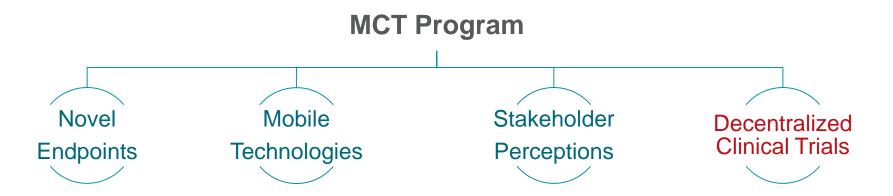
#### Mobile Clinical Trials (MCT) Program

#### **PURPOSE:**

Develop evidence-based recommendations that affect the widespread adoption and use of mobile technology in clinical trials for regulatory submission.

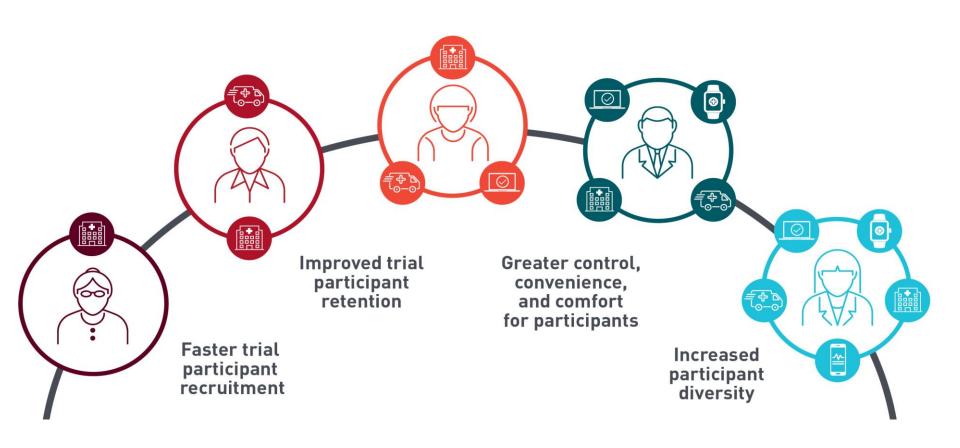
#### **ANTICIPATED IMPACT:**

Increased number of clinical trials leveraging mobile technology. More efficient trials generating better quality information.





#### **Benefits of Using Decentralized Trials**





#### **Recommendations Sections**

- 1. DCT Approaches and Protocol Design
- 2. Telemedicine State Licensing Laws
- 3. Mobile Healthcare Providers
- 4. Drug Supply Chain
- 5. Investigator Delegation and Oversight
- 6. Safety Monitoring



#### **Not All-or-Nothing Approach**

- Mobile or healthcare provider (HCP) for certain activities
  - E.g. blood draws, vital sign measurements, trial drug injections
- Trial participants use telephone or video conferencing to determine eligibility, discuss trial progress, or review participant's questions
- Visit facility when requiring major medical equipment
  - E.g. x-rays, magnetic imaging, tomography scans
- In single trial, enroll some patients at traditional trial sites, while others managed in decentralized or remote manner



## 1) Engaging Key Stakeholders in Protocol Design

- Incorporate SOPs that describe processes that are unique to DCT elements
- Meet with regulatory bodies early in the process
  - Numerous examples of specific meeting types and relevant FDA offices are provided
- Engage and learn from experienced vendors
  - DCT trial executors with telemedicine and/or mobile HCP experience



#### 2) Mobile Healthcare Providers

- Consult or partner mobile HCP vendor with experience conducting clinical trial activities
  - Specific credentials, experiences, and training are included in recommendations
- Possible mobile HCP protocol contributions:
  - Blood draws and biological sampling
  - Investigational medical product (IMP) administration
  - Trial participant training (e.g. IMP selfadministration)
  - Clinical assessments
  - In-home compliance checks (e.g. timely completion of trial participant diary, proper storage of IMP)





#### 3) Telemedicine State Licensing

- DCTs operating across numerous states can:
  - Maintain an investigator in each active trial state
  - Utilize investigators licensed in multiple states
  - Contract with vendors providing mobile HCP services across U.S.

Keep abreast of complex and varying state-by-state legal

landscape

 Use online policy resource centers

 Dedicate internal legal staff or seek external legal consultants





## 4) Drug Supply Chain

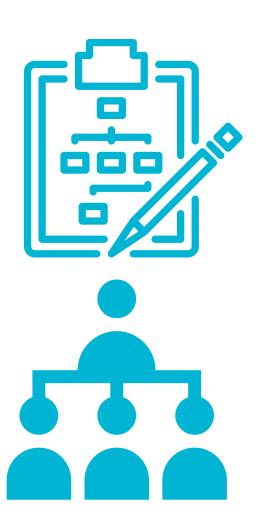
- Review state laws regarding direct-topatient shipment
- Describe direct-to-patient shipment procedures in protocol
  - Provides necessary clarity to investigators, IRBs, and regulatory agencies
- Consider engaging IMP vendor management vendor with experience shipping IMP directly to patients
- Formalize SOPs for the IMP accountability chain





## 5) Investigator Delegation and Oversight

- Highly protocol specific
- Routine care / practice of medicine vs. clinical trial related activities
- Delegation of authority considerations and responsibilities
- Determine who belongs on the Form FDA 1572





## 6) Safety Monitoring

- Highly protocol specific
- Clearly articulate procedures and train investigative staff on processes that are unique to DCTs
  - Ensure trial participants knows procedures related to possible AEs (e.g. list of approved local facilities)
  - Pre-coordination efforts between investigators and approved facilities/clinicians
- Develop protocol-specific safety monitoring and communication escalation plans



#### **Discussion / Q&A**



## THANK YOU.



**Annemarie Forrest** 

annemarie.forrest@duke.edu



www.ctti-clinicaltrials.org