## The Avoca Group

A life sciences consulting firm dedicated to improving quality and compliance in the clinical trial execution process.





# **Avoca Quality Consortium® (AQC)**

A collaborative comprised of nearly 100 pharma, biotech, CRO, and clinical service provider companies with the shared objective of elevating clinical trial quality and execution.





























































































































































































# **WEBINAR**

**Understanding Risk-Based Monitoring Post-ICH E6 (R2)** 

**HOSTED BY:** 





## **Introductions**



**Cristin (Crissy) MacDonald**, PhD *Executive Director, Client Delivery The Avoca Group* 





**Jeff Kingsley**, DO, MBA, CPI, FACRP *CEO IACT Health* 





## **Outline**

- ICH E6 (R2) Background
- ICH E6 (R2) Impact on Sites
  - Relevant Types of Monitoring
  - Risk-Based Monitoring and Trial Quality
- Summary
- Questions and Answer Session



# ICH E6 (R2) – What Has Happened and Why?

### **Proactive Quality Management - Incorporates QbD**

- Minimize risk through planning; early signaling and mitigation of problems
- Use data and pre-established tolerance limits for decision making
- Execute routine risk reviews
- Investigate root causes of emergent problems as part of corrective action process

#### **Risk-based Strategies**

- Provide oversight commensurate with risks that matter
- Document rationale for chosen strategy; reconcile roles/responsibilities and monitoring/oversight reports with chosen strategy
- Responsive/dynamic vs static system of oversight
- RBM, Risk-based Oversight, Risk-based Inspection Preparedness, and Risk-based Quality Management must be documented as appropriate QMS

#### **Oversight**

Sponsor and Investigator retain accountability for quality



# ICH E6 (R2) – What Has Happened and Why?

#### **Electronic Systems**

- Validation and quality control through qualified users and SOPs covering system setup, installation, and use
- Implicitly advises to move away from paper-based CRFs/tracking systems

#### **Serious Breaches**

 Inform regulators, where warranted by local authorities, when non-compliance is a serious breach of protocol or GCP

#### **Essential Records**

- ALCOA+C; location of source/essential documents
- Some process documents become essential documents
  - Risk review requires traceability of decision making
- Must document how risk management oversight is exercised (Monitoring Plan/Integrated Quality Management Plan) – Quality Management Plan; outcome of any centralized/statistical monitoring with actions taken
- Monitoring activities should be traceable and documented
- End of trial report on effectiveness of risk management







## The Three Main Ways Sites Are Affected by ICH E6 (R2)



QTL



The promotion of the use of Risk-Based Monitoring

Use of Quality
Tolerance
Limits

Sponsor and Investigator retain responsibility for Quality



# **Monitoring and Trial Quality**

## **TransCelerate: Source Data Verification**



Clinical trial sites have varying levels of experience and quality, but monitoring approaches are not designed to manage potential differences.



Research indicates that 100% SDV is not effective at identifying material risk. Very low amount of transcription errors that impact data evaluability. Still, monitoring approaches remain unchanged.



**Targeted Site Monitoring and SDV** could lead to improvement in data quality and patient safety for clinical trials and *reduction in effort expended on low-value activities.* 



## **Polling Question Results**

What percentage of your organization's studies utilize risk-based monitoring?

<25%	42.1%
25%-50%	21.4%
50%-75%	21.4%
>75%	15.1%



# **Types of Risk-Based Monitoring**



## **Centralized Monitoring**

- Data Analytics Review, Statistical Reviews for performance assessment, real-time analysis, reporting through various e-data sources
- Metrics and Tolerance Limits for acceptable 'deviation' range



## **Remote (Offsite) Site Management Monitoring**

- Site Relationship and Site Management (trial progress, recruitment, ISF, etc.)
- Follow-up: anomalies or deviations identified during centralized monitoring
- Early communication, evaluation and re-training for performance issues/gaps, tracking regulatory requirements, etc.



### **Onsite Site Management Monitoring**

- Site Management: HSP, GCP, protocol adherence
- Assess overall quality & performance identify gaps and issues
- Monitoring critical data, processes and GCP requirements for HSP and reliability of trial results



## **Polling Question Results**

# What type of risk-based monitoring does your organization use? (check all that apply)

Centralized Monitoring	59.7%
Remote (Offsite) Site Management Monitoring	59.7%
hemote (Onsite) Site Management Monitoring	39.7 70
Onsite Site Management Monitoring	68.4%
Others	4.00/
Other	4.3%
None of the Above	8.7%



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# **QUESTIONS?**





## **Risk-Based Monitoring: Impact on Sites**





## **Summary**

- Because of ICH GCP E6 (R2), risk-based approaches are here
   to stay for all Phase I-III clinical trials
- When developed and executed effectively by sponsors, sites learn early in the study any issues/problems to correct so that more subjects/cases are not impacted (resulting in less re-work and non-evaluable subjects)
- Impacts site resourcing, processes, procedures, and budgets
  - Site proactive time-keeping practices support their ability to negotiate contracts with evidence supporting their budget requests to sponsors



# **QUESTIONS?**





## **Upcoming Webinars & Conferences**

### [WEBINAR] AQC Knowledge Center Monthly Demo

October 9, 2018 | 11:00am – 12:00pm EDT

#### **ExL's 9th Clinical Quality Oversight Forum**

October 10-12, 2018 | Philadelphia, PA

Join Steve Whittaker, Senior Consultant, The Avoca Group for two sessions...

- Friday, October 12 | 11:15am The Impact of (R2) on Sites
- Friday, October 12 | 1:45pm *Panel Discussion: Inspection of Oversight Activities*

#### 7th Annual AQC Fall Member Meeting

October 30, 2018 | Princeton, NJ

[WEBINAR] Biopharma Pre-competitive Collaboration: Delivering for Clinical Trial Excellence

November 12, 2018 | 11:00am – 12:00pm EST



# **Thank You!**

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