



Innovative Clinical Development Solutions

The Era of Flexible Monitoring Models:

Centralized Real-Time Data Review and Utilization of Targeted Source Document Verification



Heather Paden, Head of Clinical Operations

- Local regulatory knowledge, strong relationships with investigational sites and medical experts, and highly experienced cross-functional teams, worldwide.
- World-class data science powered by cutting-edge technologies, expert biostatistical analyses, and experienced regulatory medical writing.

What's required?

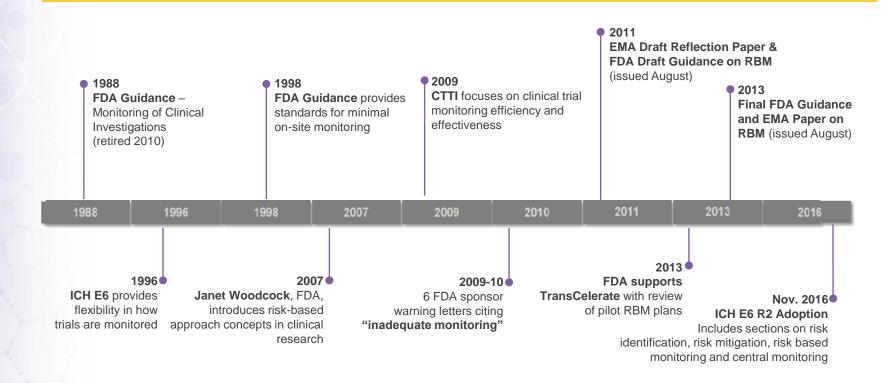
Overview

- A change in mindset
- Rationale for different approaches to monitoring data
- Pre-requisites and tools
- Case Study: Value proposition in rare disease studies
- Considerations

A Change in Mindset



Regulatory Agencies Acknowledge Flexibility



The Evolution of Risk Based Monitoring

СТТІ	FDA Guidance	EMA Reflections Paper	TransCelerate Paper
 Quality by Design Tailor monitoring approach Protocol quality impacts monitoring quality 	 Quality Clinical Trial Data Assess Risk Combination of monitoring activities Tailor Monitoring Plan 	Risk Based Quality Management Plan Adapt Build on experience and advances	 RBM Methodology Holistic, proactive approach; risk assessment, mixture of remote & on-site monitoring
CLINICAL TRIALS TRIALS INITIATIVE	U.S. Food and Drug Administration Protecting and Promoting Public Health www.fda.gov	EUROPEAN MEDICINES AGENCY SCIENCE MEDICINES HEALTH	TransCelerate BIOPHARMA INC. ACCELERATING THE DEVELOPMENT OF NEW MEDICINES

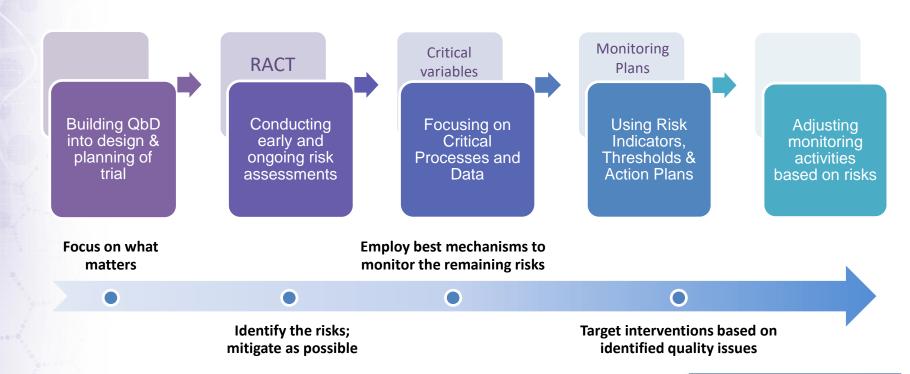
ICH E6 Good Clinical Practices (R2)

- Since original allowed flexibility in monitoring approaches
- Increased focus on Critical Data and Processes (trial activities essential to ensuring subject protection and reliability of trial results)
- Implement a system to manage quality
- Risk identification, risk evaluation, risk communication, risk control, risk review and risk reporting
- Monitoring based on Risk including the use of centralized monitoring to compliment or reduce on-site monitoring

Risk-Based Monitoring Methodology

- Risk Based Monitoring is more that just onsite monitoring, it is an end to end approach based upon Risk Assessments and Quality by Design
- TransCelerate has created an approach that has been adopted (and adapted) by big Pharma, CROs, etc.
- It has also given the software providers such as Medidata a roadmap to develop new tools to support the methodology

Risk-Based Monitoring Methodology



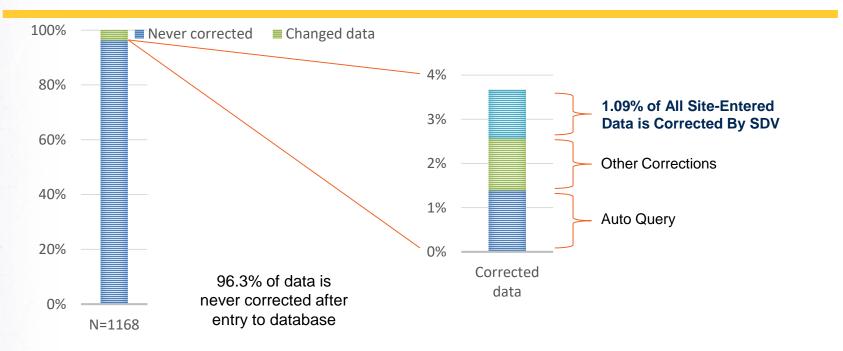
Rationale for Different Approaches to Monitoring Data



One Size Does Not Fit All

- Not all studies are the same, similarly not all sites are the same....
 so why monitor them in the same way?
- The traditional 100% Source Data Review (SDV) approach has been shown in studies to have little impact on overall data quality but is time consuming for CRAs
- Programmatic assisted monitoring centrally is faster, cheaper and more effective at monitoring data
- Free up CRA time on-site to perform higher value tasks that cannot be assessed directly from the data

Retrospective SDV Analysis*: Additional Insight into Metric #2 Impact of SDV on Site-Entered Data



^{*} Evaluating Source Data Verification as a Quality Control Measure in Clinical Trials: Therapeutic Innovation & Regulatory Science 2014, Vol. 48(6) 671-680

Pre-Requisites & Tools

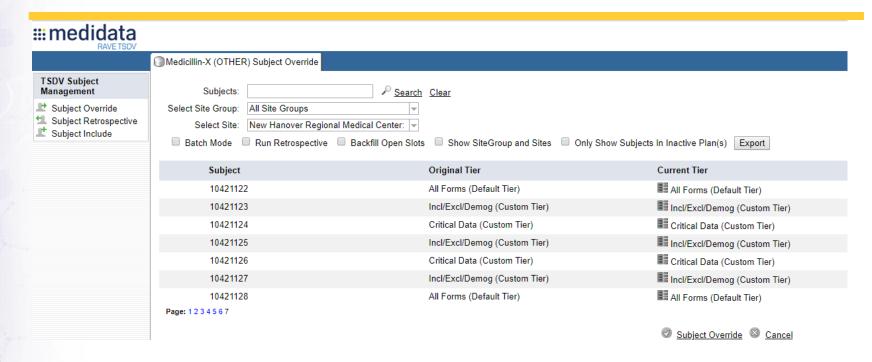


Pre-Requisites

- An organization willing to change!
- Successful TSDV relies on proper risk identification
- A solid foundation based upon risk and understanding what data/processes are important
- Agreement on which monitoring strategies are best suited to ensure quality and data integrity
- Centralized monitoring is reliant upon timely access to data
- Tools to support
 - The assignment and tracking of onsite monitoring
 - Centralized monitoring (from programmed edit checks, monitoring listings and tables...to advance statistical machine learning tools)

Targeted SDV (TSDV)

- TSDV is a tool that allows for a advanced method to assign and track SDV
- Through the use of Blocks and Tiers advanced assignments can be made
 - e.g. the first subject at each site could be 75% SDV, followed by 25% for each subsequent subject
- Changes at study, region, individual sites or individual subjects can be made



Subject TSDV Tier assignment.

Subjects 10421127 and 10421128 assigned to different tiers.

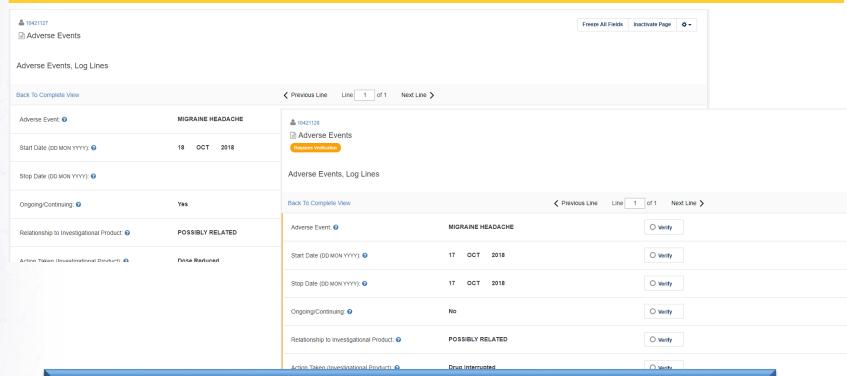
Case Study: Value Proposition in Rare Disease Studies



Study Design:

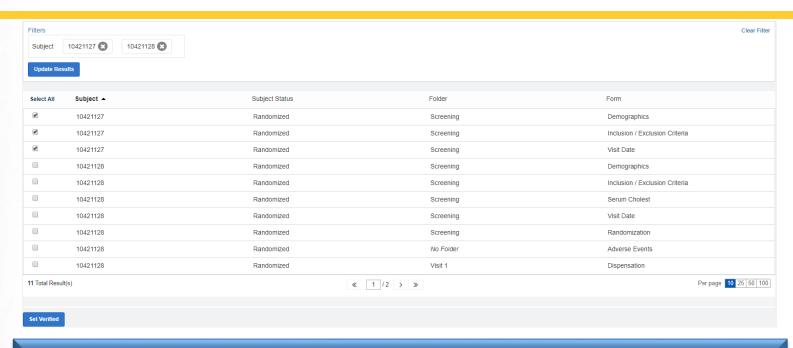
- Phase 2, Open-Label
- Three times a week dosing of ABC-123456 in subjects with a transfusion dependent rare blood disorder
- Local and central labs
- MRI derived key secondary endpoint
- Duration: 12 months

Which terms above that reflect potential Critical Data and/or Critical Processes?



AE forms of the 2 subjects with almost identical data.

10421128 requires all fields be verified while the other does not.



As you can see, only 3 forms requiring verification for 10421127 and multiple others for 10421128 even though they have virtually identical data entry.

Considerations



Considerations

- CRA visits saving an hour on SDV, what does it actually mean?
- Centralized monitoring relies upon near real-time access to data to be most effective
- All monitoring needs to be documented, including centralized monitoring



