Leonard Sacks MD

Office of Medical Policy CDER, FDA

Background

- New urgency with COVID 19*
- 1) Ongoing trials were under threat
 - New concerns about patient safety- unable to visit sites
 - Reliance on technology that not everyone had
 - Breakdown in supply chains to patients
 - Inability to get lab tests
- 2) Trials for COVID-19 presented other challenges
 - Urgent implementation, data needed for many treatment options including existing (repurposed) drugs

^{*}Conduct of Clinical Trials of Medical Products During the COVID-19 Public Health Emergency

Advantages of remote data acquisition in cancer and other diseases

- Convenience for patients
 - Mobility
 - Cognition
 - Practical-missing work, childcare
- Rare diseases
 - Avoid travel to study centers for patients in remote locations
- Continuous or frequent data
 - Sensors, smartwatches, tablets
- Real world environment
 - Evaluation of functionality in daily life

Innovative approaches to cancer trials

Decentralized clinical trials

Trials where some are all trial-related activities take place at locations separate from the investigator's location

- 1. Video interactive tools and telemedicine
- 2. Electronic informed consent
- 3. Use of local healthcare services (e.g., laboratories, imaging)
- 4. Direct distribution of drugs to patients
- 5. Use of real-world data, EHRs, Registries
- 6. Trials in the health care setting (pragmatic)
- 7. Master protocols
- 8. Remote data gathering using sensors and other technology (digital health technologies)

Video interactive tools and telemedicine

- Standard practice in telemedicine environments
- Limited use so far in clinical trials (telephone visits, IVRS)

- Use of Electronic Informed Consent in Clinical Investigations – Questions and Answers. FDA guidance 2016
- Can be done from patients' homes

- Trial related-data that require inperson visits would be missing (e.g. physical examination)
- Patient retention may be more difficult

Use of local health care services

- Local facilities for routine laboratory tests, medical imaging (major components of Recist criteria)
- Local healthcare workers, phlebotomists etc.

- Variability of unstandardized data from many different sources
- Superiority studies may be more reliable than non-inferiority studies

Direct distribution of drugs to patients

- Complicated local regulations- states and international. Many states relaxed requirements during COVID 19
- Investigator tracking and control of drugs
- Shipping and packaging
- Safety during home administration

Real world data, EHRs and registries

- Use of Electronic Health Record Data in Clinical Investigations 2018 (FDA guidance)
- Automated data retrieval from EHRs

Trials in the healthcare setting

- Allow use of clinical care infrastructure and personnel
- Convenient for patients
- Helpful environment for long term follow-up of cancer patients
- Randomization will be important
- Considerations:
 - Diagnoses that are routinely made in the healthcare setting
 - Outcomes that are simple to determine and reliably captured in the health care setting
 - Trial procedures that are generally part of clinical care

Master protocols and trial networks

- Allow rapid introduction of new investigational drugs into trials (platform trials)
- May facilitate study of subgroups (basket trials)
- Take advantage of existing infrastructure

Remote data gathering using sensors and other technology (digital health technologies)

- Biosensors in clinical practice (continuous ECG, pulse oximetry, continuous glucose monitors, ambulatory BP, Weight)
- Other sensors –Actigraphy, Interactive apps (visual tests, hearing tests coordination tests, cognitive tests), cellphone photography, video-recordings
- Allow continuous monitoring, measurement of functionality and may capture rare events
- May be useful for patient selection, outcome assessment, capturing AEs
- Validation/verification and user testing are critical for use in trials

Unintended consequences?

- We will learn which activities were reliable and which were not.
- Which practices led to variability in data or reduced the quality and completeness of data and which practices were beneficial
- Outdated practices will probably disappear
- Much more reliance on electronic systems
- A new vision of clinical trials both for investigators and for patients

Looking ahead...

- Important to share experiences among regulatory agencies in other countries since so many of our trials are international.
- Developing specifications for technologies may be important to ensure quality and reliability of data from digital health technologies used in different settings.
- Systems used for telemedicine activities are likely to become more sophisticated and hopefully more secure.
- Regulatory agencies will need agile procedures to adapt to better systems and technologies and to identify problems early and efficiently.
- It is likely that in 5-10 years, the time and cost of clinical trials will become more manageable as we engage the power of our technological tools