



CLINICAL  
TRIALS  
**TRANSFORMATION**  
INITIATIVE

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# A New Path Forward for Using Decentralized Clinical Trials

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# Clinical Trials Transformation Initiative

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



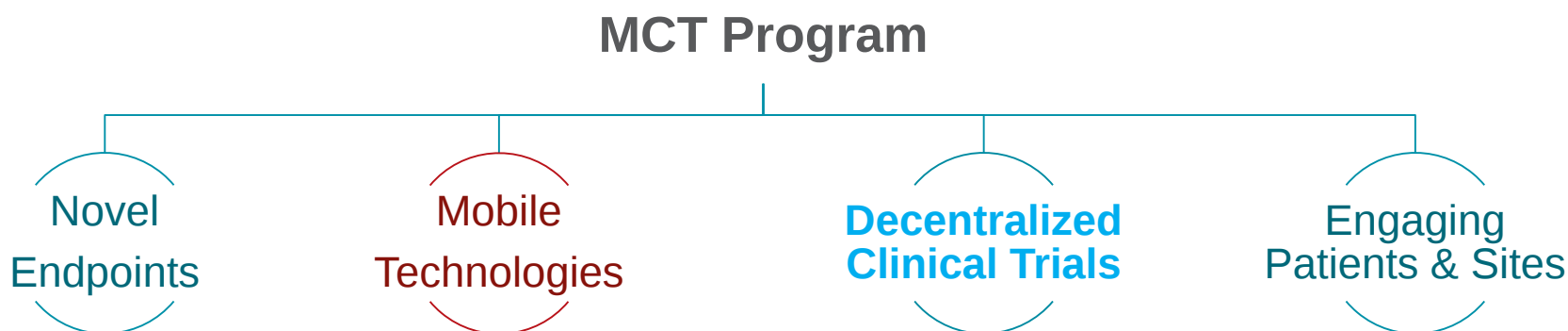
# Mobile Clinical Trials (MCT) Program

## PURPOSE:

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

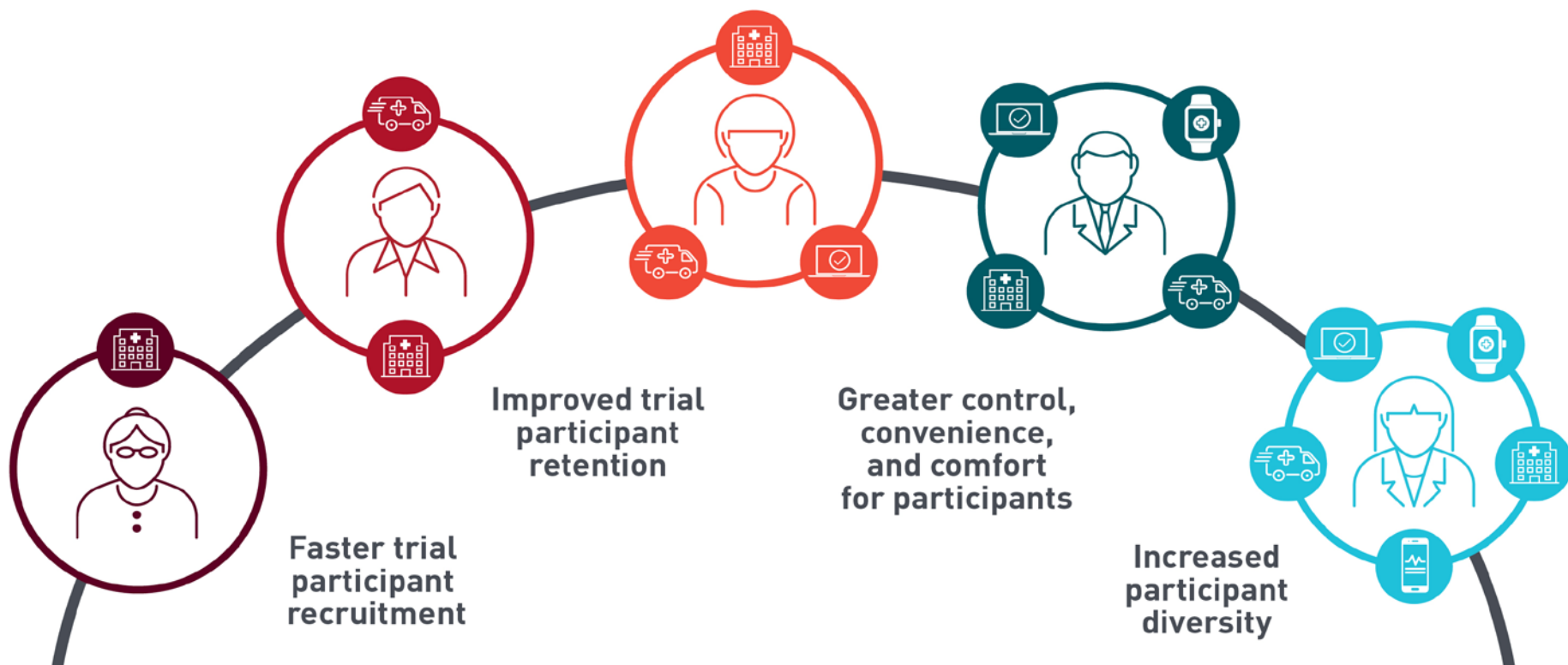
## ANTICIPATED IMPACT:

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



*\*Scope: FDA-regulated clinical trials after the time of initial research volunteer consent*

# 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

# Engage 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



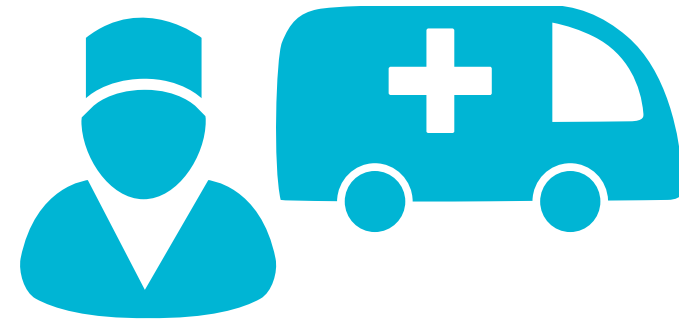
# Telemedicine State Licensing

- ▶ 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



# 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 self-administration)
  - Clinical assessments
  - In-home compliance checks (e.g. timely completion of trial participant diary, proper storage of IMP)



# Drug Supply Chain

- Review state laws regarding direct-to-patient 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



# 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



# 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



# THANK YOU.



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[www.ctti-clinicaltrials.org](http://www.ctti-clinicaltrials.org)