

# KEYNOTE ADDRESS: OVERVIEW OF RISK BASED MONITORING AND A CASE STUDY OF IMPLEMENTATION WITHIN A MIDSIZE CRO

21 JUL 2016



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# PRESENTERS

## Cheryle Evans, SVP, Clinical & Medical Operations

- Senior executive with 27 years of research experience including 18 years in CRO project management, study start-up, clinical monitoring and document management
- Member of Drug Information Association and ACRP

## Patricia Wozniak, PhD, Sr. Dir., Biostatistics

- Over 20 years of industry experience and over 25 years of statistical consulting experience
- Published over 60 journal articles
- Member of the American Statistical Association, Drug Information Association, and CDISC Questionnaire Sub-team

## Katie Obermeyer, Manager, Biostatistics

- 10 years of industry experience in both large pharma and CRO
- Member of the American Statistical Association

# RISK BASED MONITORING INITIATIVE - AGENDA

- Overview of Advanced Group
- A Perspective on RBM
- The AC RBM Initiative
- AC RBM End-to-End Process
  - Policy
  - Tools
    - Key Risk Indicators (KRIs)
    - Risk Assessment Tools
    - Data Monitoring Plan
- Considerations for RBM Readiness
- Q&A





ADVANCED GROUP

# THE ADVANCED GROUP OF COMPANIES

- Parent – Advanced Group, established 1988
  - Experts in talent acquisition and management, consulting, outsourcing and professional services
  - 4 Business Segment Specialties
    - **Wunderland** - Marketing/Creative staffing business
    - **Advanced RPO** - Recruitment Process Outsourcing solutions (RPO)
    - **Advanced Resources** - Staffing services for office support, accounting/finance, and healthcare positions (Temporary, temp-to-hire, direct hire and executive search)
    - **Advanced Clinical** - Contract staffing, FSP solutions, and full service CRO services for the Clinical Research Industry
  - Profitable with 2015 revenues of ~\$150M
  - Company focused on philanthropic activities



**Advanced Clinical offers global outsourcing solutions inclusive of staffing, FSP, and full-service CRO models**



# ADVANCED CLINICAL IS AWARD WINNING

- Privately-held organization founded in 1995
- Best-in-class leadership
  - Leader of DM SCDM Board Member
  - Leader of Statistics holds position on CDISC COA sub-team
  - Experienced clinical leadership working together for over 15 years
    - Panel leaders/speakers at Industry forums on CRO/FSP strategies
  - Patient recruitment experts average 12 years experience
- Award-winning organization



# ONLY MID-SIZE CRO OFFERING ALL DELIVERY MODELS

- Global Feasibility
- Project Management
- Patient Recruitment & Retention
- Clinical Monitoring
- Data Management
- Biostatistics
- Medical Monitoring
- Pharmacovigilance
- Medical Writing
- Quality & Validation

Full Service  
CRO



- FSP teams across projects
- Functional services by project
- Gap augmentation
- Quality oversight
- Study rescue management

Functional  
Outsourcing



- On-Demand Staffing
- Staff Augmentation
- Direct hire
- Temp-to-perm
- Asset transfer
- Payrolling

Strategic  
Staffing



*Our Services are Customized for Long-Term Client Benefits!*



## GLOBAL REPRESENTATION IN OVER 50 COUNTRIES

- We have a strategic partnership to enhance our global offering providing access to more than 50 countries
- Formal relationship inclusive of:

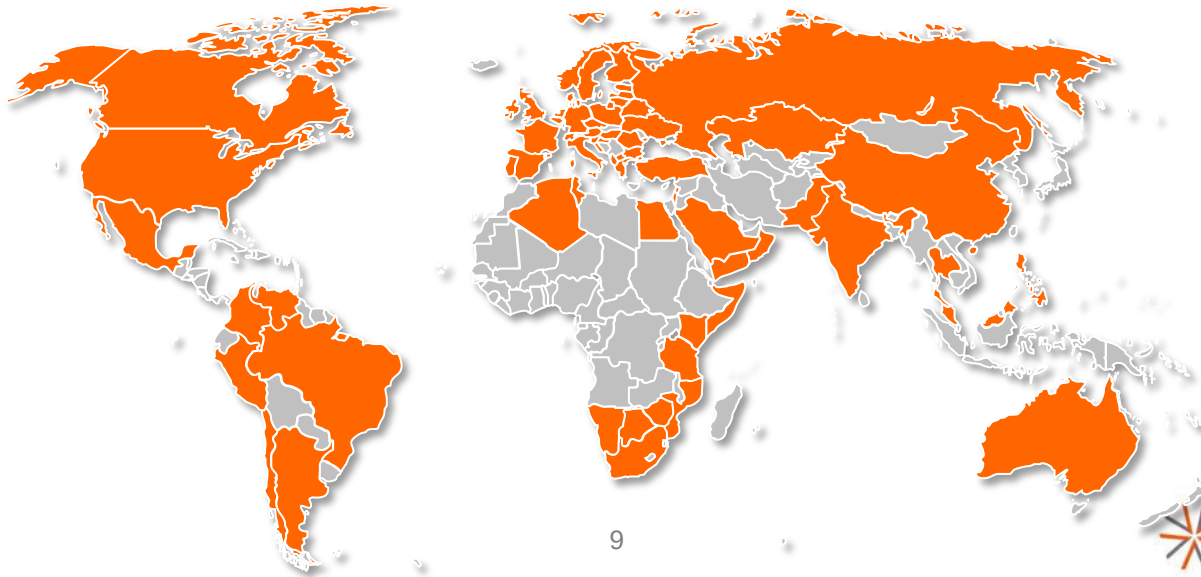
## Governance Structure

# Operational Guidelines

# Quality Manual

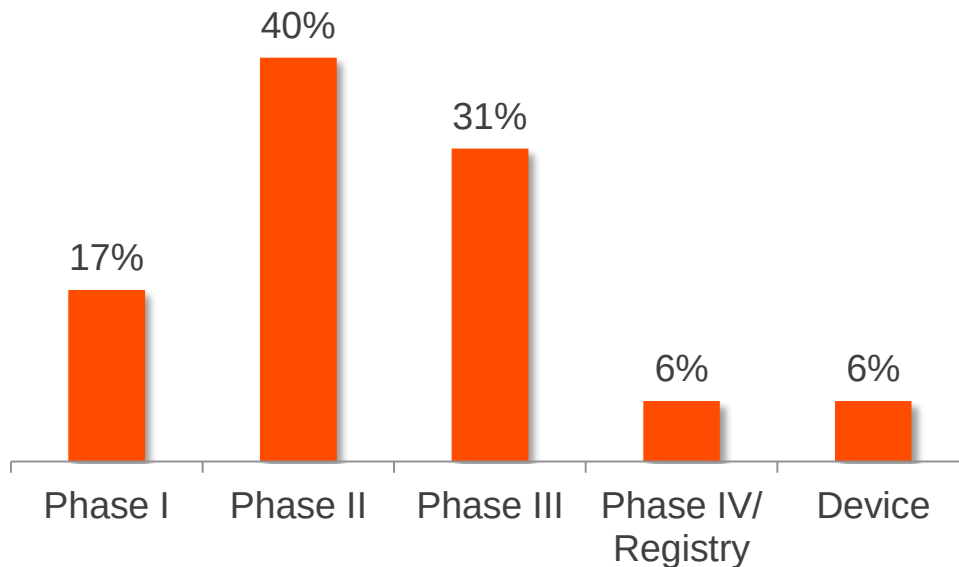
## Bi-annual Audits

## Face-to-Face Meetings



# STUDY PHASE & THERAPEUTIC AREA EXPERIENCE

Advanced Clinical has experience across all Phases, in all major therapeutic areas including drug, biologic, generic, and device.



- Anti-Infectives
- AutoImmune
- Cardiology
- CNS
- Dermatology
- Gastroenterology
- Genitourinary
- Inflammation/Musculoskeletal
- Metabolic Disorders/Endocrinology
- Oncology/Hematology
- Ophthalmology
- Pediatrics
- Pulmonology/Respiratory
- Rare Diseases/Special Populations
- Women's Health

# A PERSPECTIVE ON RBM



# RBM: DEFINITION & RATIONALE



## RBM Definition

- Risk-based monitoring is the process of ensuring the quality of clinical trials by identifying, assessing, **monitoring** and mitigating the risks that could affect the quality or safety of a study

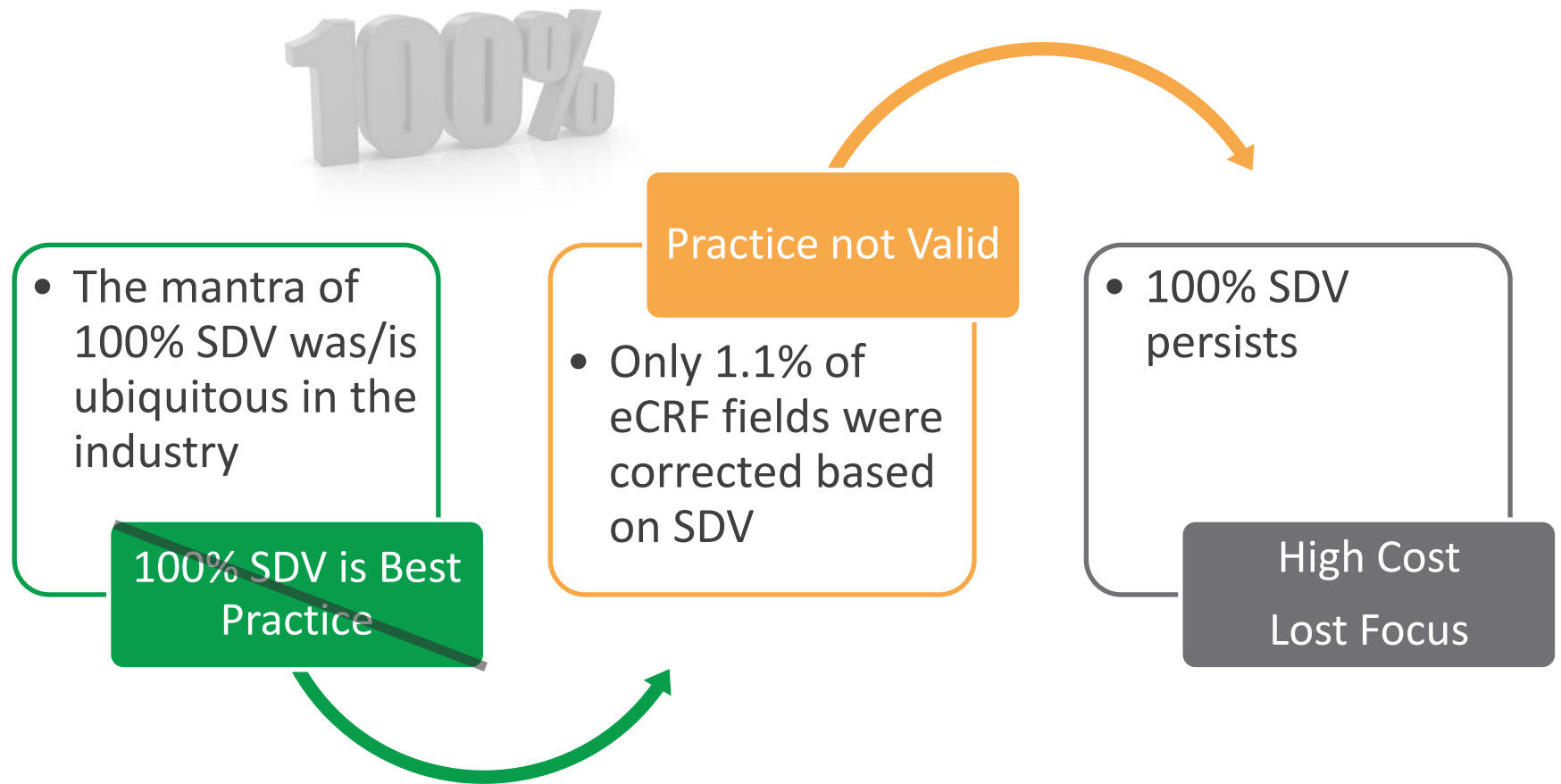
**FDA RBM Guidance:** “The overarching goal of this guidance is to enhance human subject protection and the quality of clinical trials by focusing Sponsors on the most important aspects of study conduct and reporting.”

## Rationale

- Human subject protection & quality
- Centralize a complex, labor-intensive & expensive decentralized process
- Improved management based on predetermined core risk indicators and data
- Focus onsite activity on source data review

<http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/default.htm>

# WE ALL AGREED 100% IS BEST: BUT WERE WE RIGHT?



# SOURCE DATA REVIEW (SDR) AND SOURCE DOCUMENT VERIFICATION (SDV)



## **SDR - High Value Activity**

Review of the source documents to check the quality of the source, protocol compliance, Investigator involvement, compliance with own SOPs



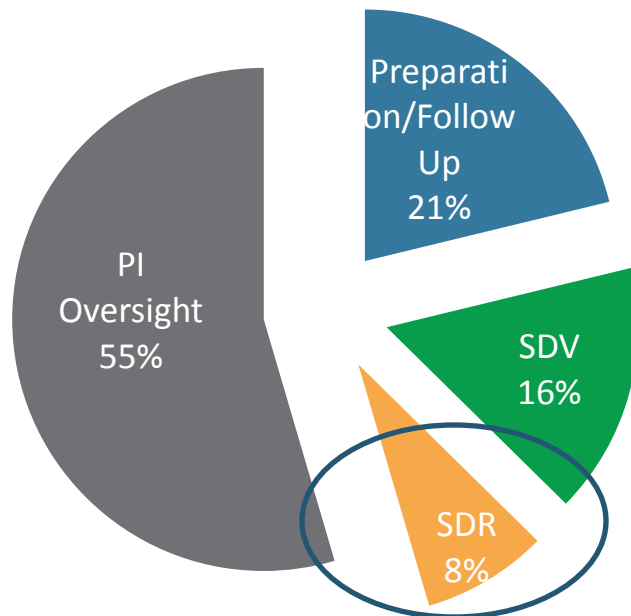
## **SDV - Low Value Activity**

Transcription checking – comparison of source data and CRF

**RBM reduced SDV: Transcription checking on a sampling of subjects in combination with centralized and remote data monitoring review.**

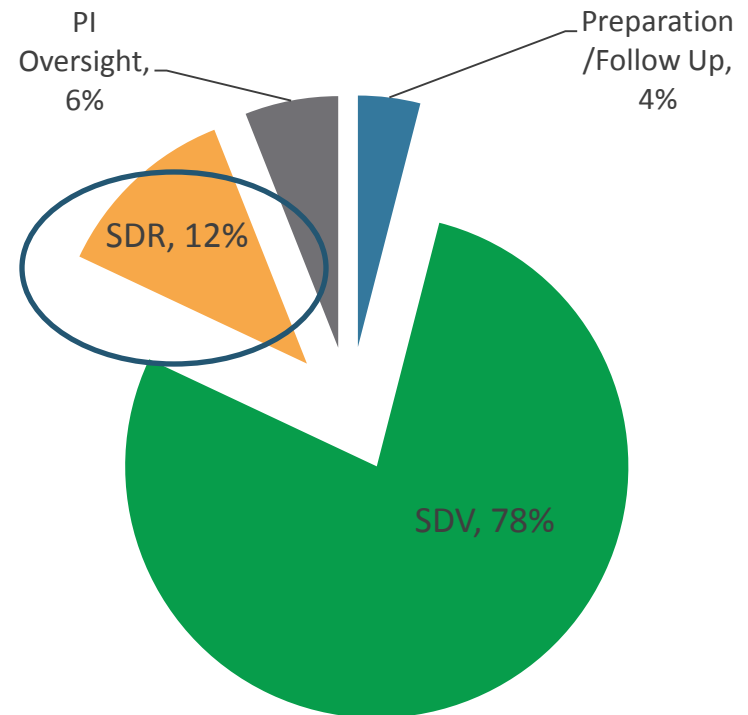
# AUDIT EXPERIENCE VS. ALLOCATION OF “TRADITIONAL” ON-SITE EFFORT

## Distribution of Investigator Site Audit Findings



Distribution based on 2012 findings from 289 relevant audits out of the 628 investigator site audits and applicable Country Office and vendor audits that were performed on Pfizer sponsored studies.

## Traditional Allocation of On-Site CRA Effort

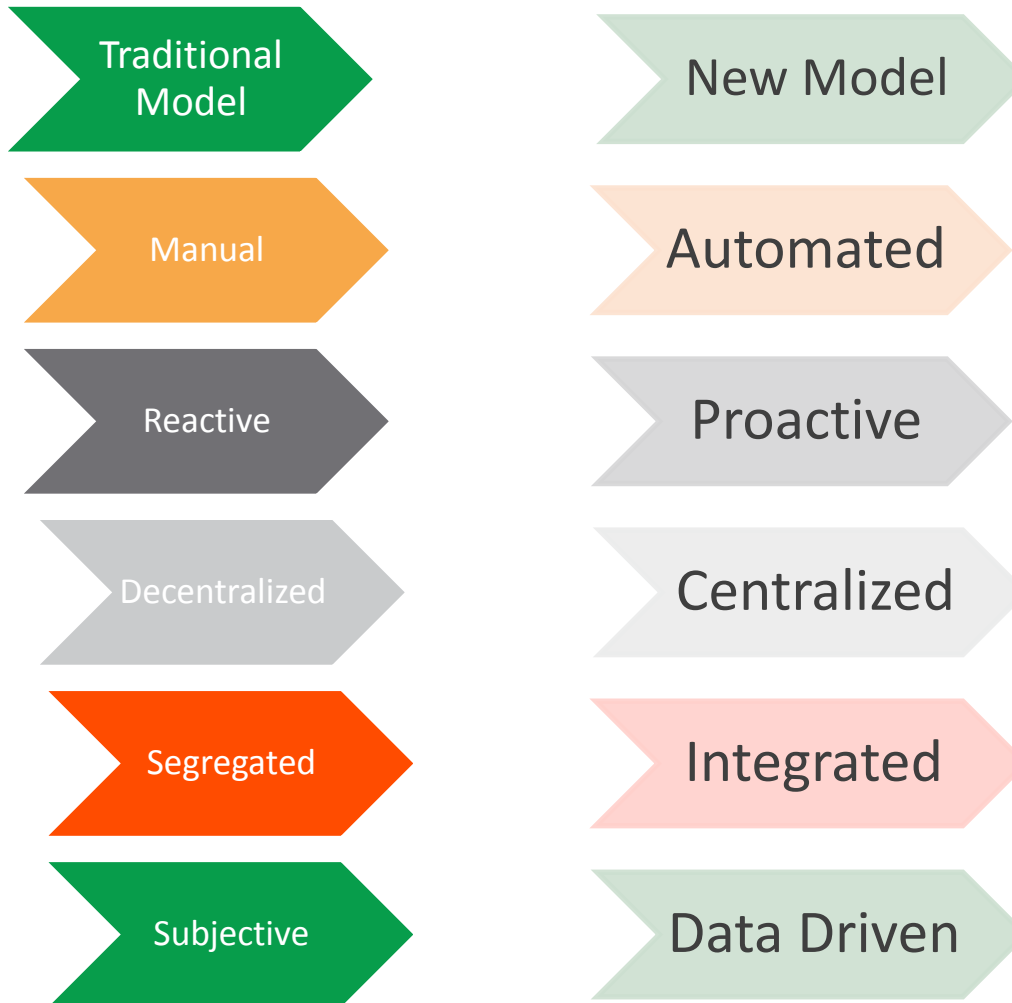


TransCelerate Analysis: 9 therapeutic areas, 6 companies, 380K queries → only 2.4% related to SDV of critical data

Based on industry estimates



# NEW MODEL ADVANTAGES



# RBM AND THE CASE FOR CHANGE: NOW IS THE TIME

## A Consensus that Data Driven Monitoring (DDM) will:

- Enhance Quality
- Improve Safety
- Reduce onsite monitoring costs

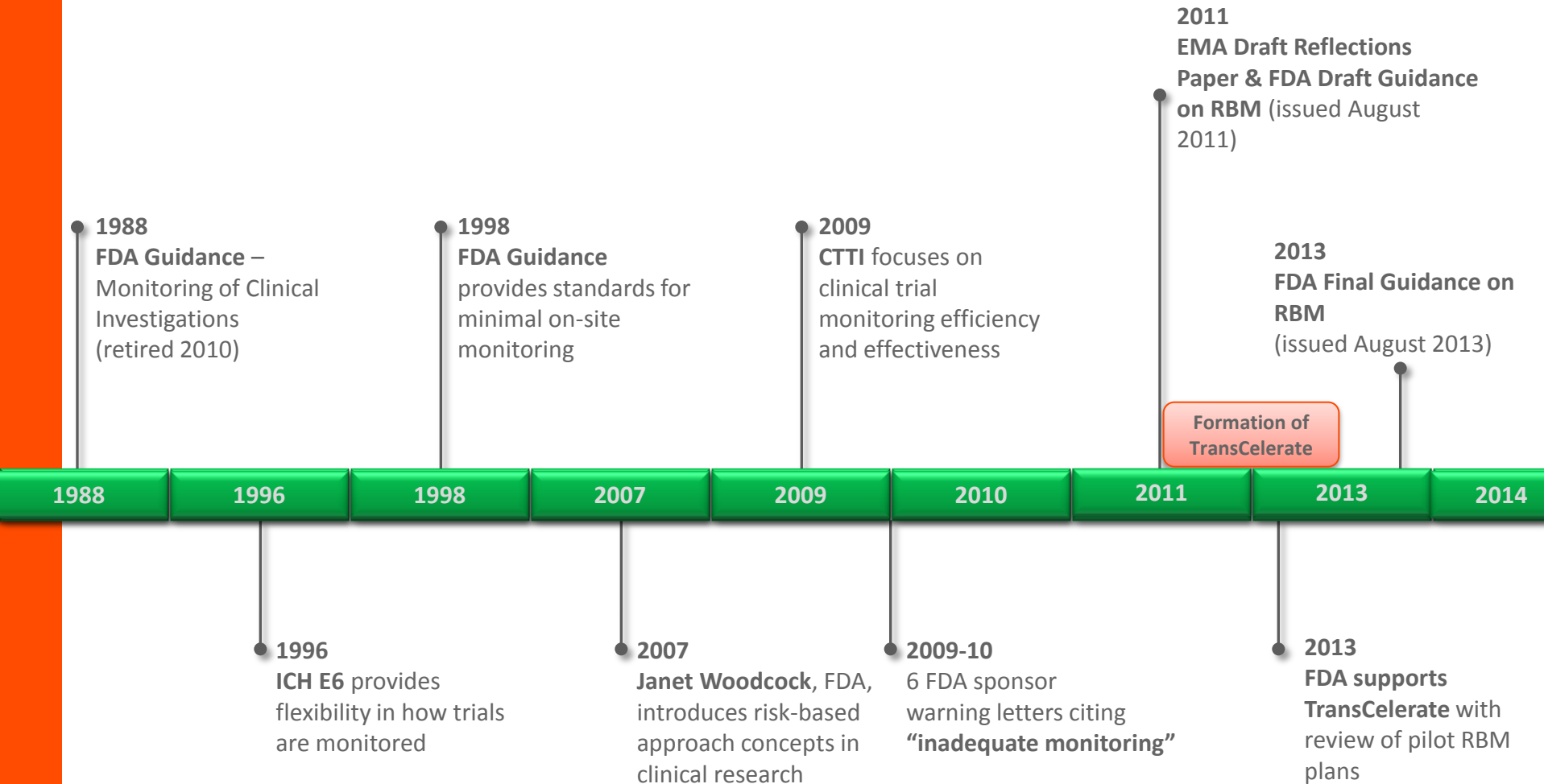
## Technology Available to Assess Data

- Sophisticated technology to transform desperate data sources into meaningful dashboards
- Allow clinical teams to make observations, assess RISK & deploy focused actions

## Regulators Onboard

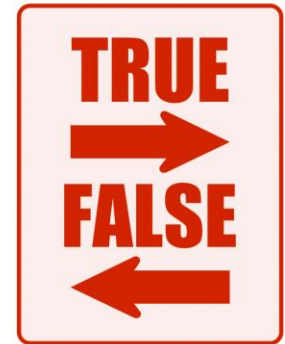
- FDA issued final Guidance in Aug 2013
- EMA issued final Guidance in 2011, updated Nov 2013

# REGULATORY AGENCIES: LEADING THE MOVEMENT



# COMMON RBM MISCONCEPTIONS

- RBM is Risky Monitoring
  - 100% SDV as the gold standard ensures the highest level of quality and the lowest risk
- RBM will reduced SDR
- RBM will lower costs
  - lower costs by doing less monitoring
- Monitoring efforts are eliminated or substantially reduced
- Technology will automate monitoring and eliminate CRAs



# TRANSCCELERATE QUANTITATIVE PERFORMANCE METRICS<sup>1</sup>

| Metric                                                                                                                             | Attribute  | Result   |
|------------------------------------------------------------------------------------------------------------------------------------|------------|----------|
| 1. Average number of major/critical audit findings per audited site                                                                | Quality    | Positive |
| 2. Percentage of site unreported, confirmed SAEs compared to total SAEs                                                            | Quality    | Positive |
| 3. Significant Protocol Deviations rate per treated subject – Total number of deviations/total number of subjects for the protocol | Quality    | Positive |
| 4. Median number of days from patient visit to eCRF data entry                                                                     | Cycle Time | Positive |
| 5. Median number of days from query open to close                                                                                  | Cycle Time | Positive |
| 6. Median number of days from significant/major issue open to close                                                                | Cycle Time | Positive |
| 7. Average Monitoring (all types) cost per site                                                                                    | Efficiency | Neutral  |
| 8. Average interval between on-site monitoring visits per site                                                                     | Efficiency | Mixed    |

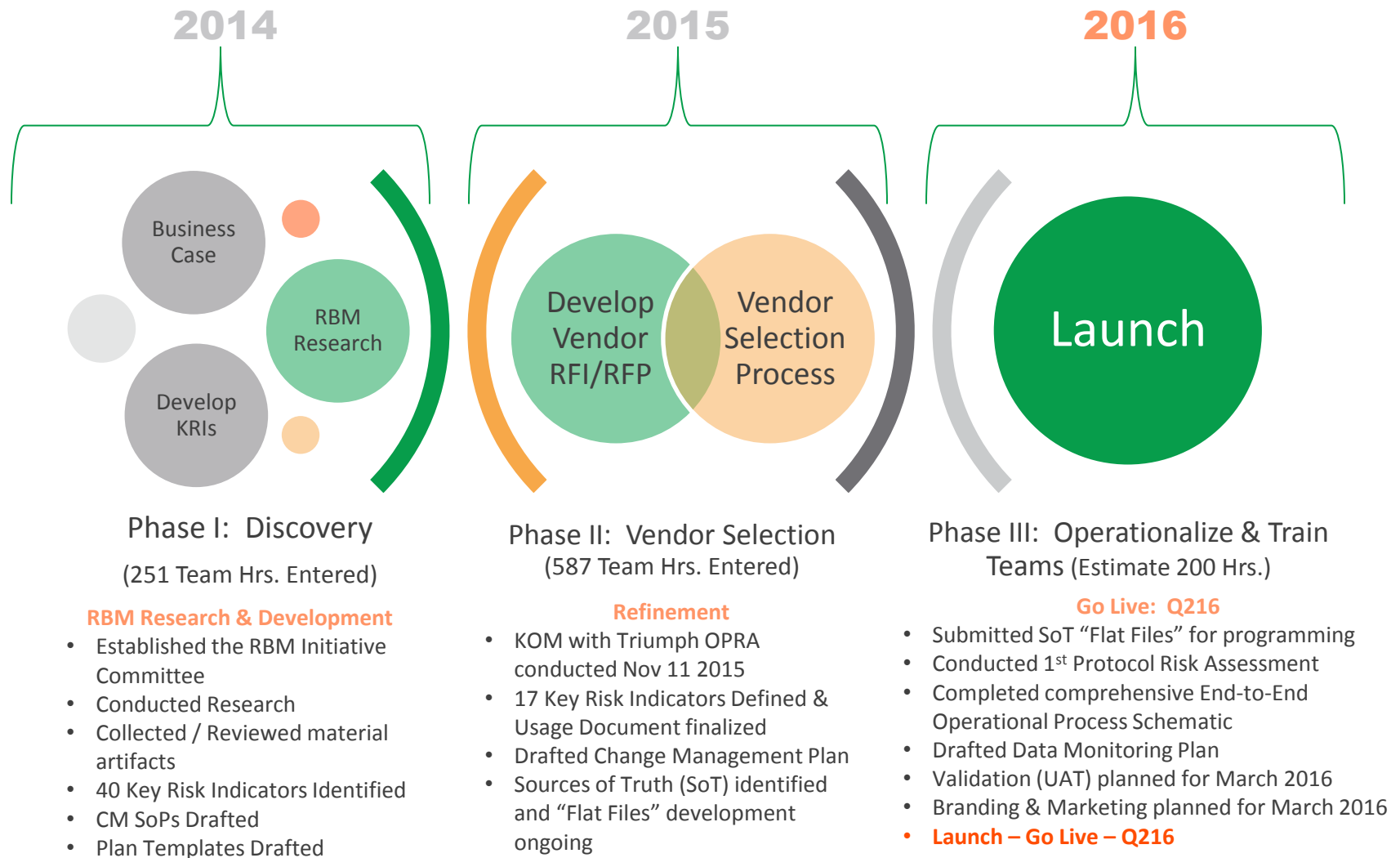
“Seven (7) TransCelerate member companies voluntarily reported metrics on 59 RBM Trials to a blinded third party. Not all member companies provided metrics but through survey it is known that at least ten companies implemented RBM in at least 125 trials in order to evaluate the methodology.”

<sup>1</sup> Source: Risk Based Monitoring Update – Vol V FINAL 28Jan2016  
2016 TransCelerate BioPharma Inc.

# THE AC RBM INITIATIVE



# AC RBM INITIATIVE



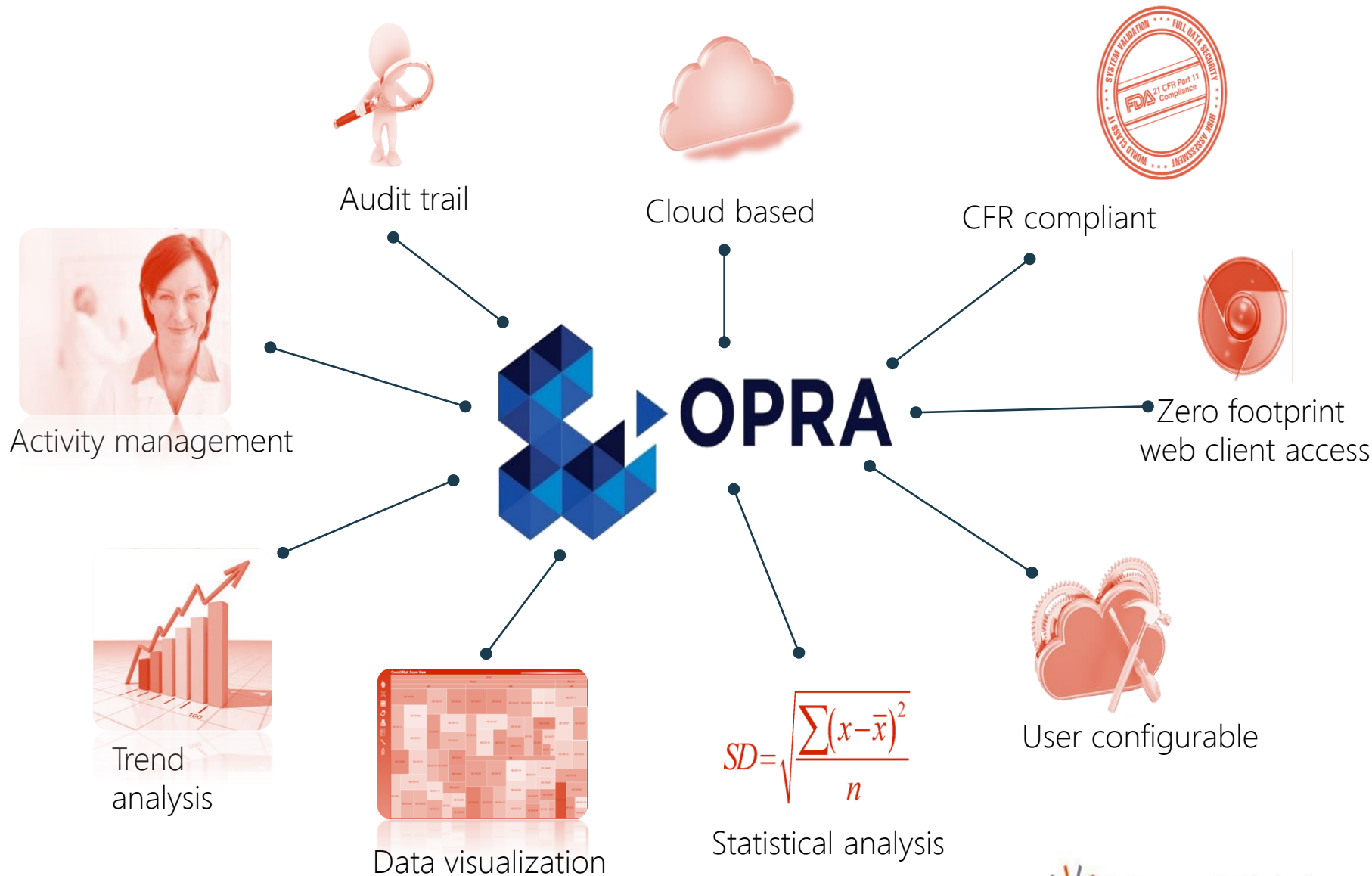
# ANALYTICAL TOOL SELECTION

- Developed a 12 page comprehensive RFI with input from Sponsor Partner
- Reviewed ten providers, inclusive of Medidata, and received five (5) RFIs from:
  - Comprehend
  - J-Review
  - Oracle
  - TIBCO – Spotfire
  - Triumph OPRA
- Narrowed the list to three (3) and conducted F2F presentations
  - Comprehend
  - TIBCO - Spotfire
  - Triumph OPRA
- **Final Choice → Triumph OPRA**
  - System agnostic
  - Only provider with a closed system that documents
    - Risks (Observations)
    - Mitigations and F/U (Actions)
  - Consultants that are SMEs in RBM → currently working with clients in RBM
  - RBM is their core competency





# TRI – OPRA SYSTEM CAPABILITIES



# OPERATIONALIZING RBM



# ASSESSING RISK



# OPERATIONALIZING RBM



## **Risk:** Understand RISK in the context of a clinical trial

- Level of uncertainty vs. immediate hazard

## **KRIs & Risk Mitigations:** Identify Key Risk Indicators (KRI)s & Set Mitigation Plans

- Transcerialize's RACT
- MCC's RAMMT
- Data Monitoring Plan

## **Data:** Identify where the data is located

- Sources of Truth (SoT)
- Import files

## **Dashboard:** Consolidate the SoT electronically and generate a RBM Dashboard

- Identify an analytical tool provided (TRI OPRA)
- Establish a set of KRIs and Usage Definitions

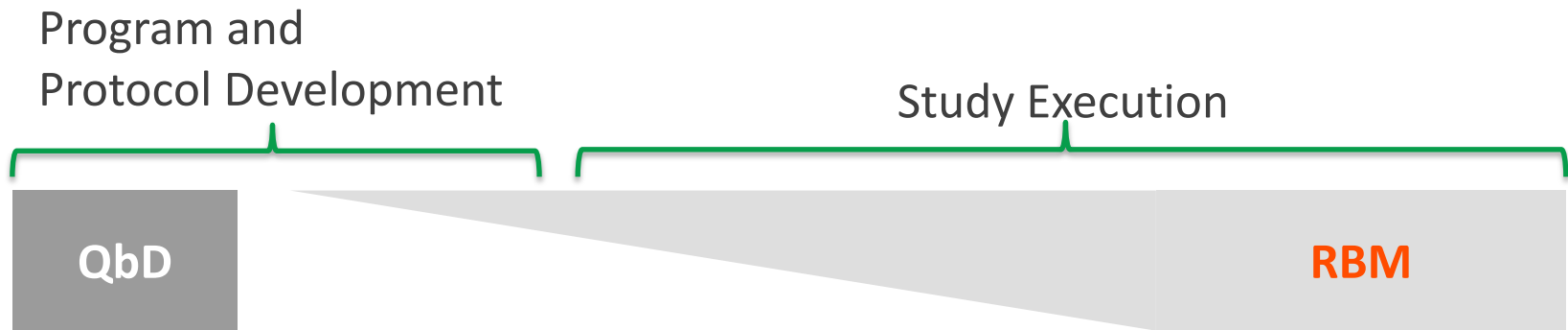
## **Infrastructure:** Team Roles & Responsibilities

- Defined task ownership and processes

## **Quality:** Set a quality processes that will stand up to a regulatory audit

- Meet regulatory guidance requirements with prospective plans, SOPs, processes and documentation

# QUALITY BY DESIGN (QBD)



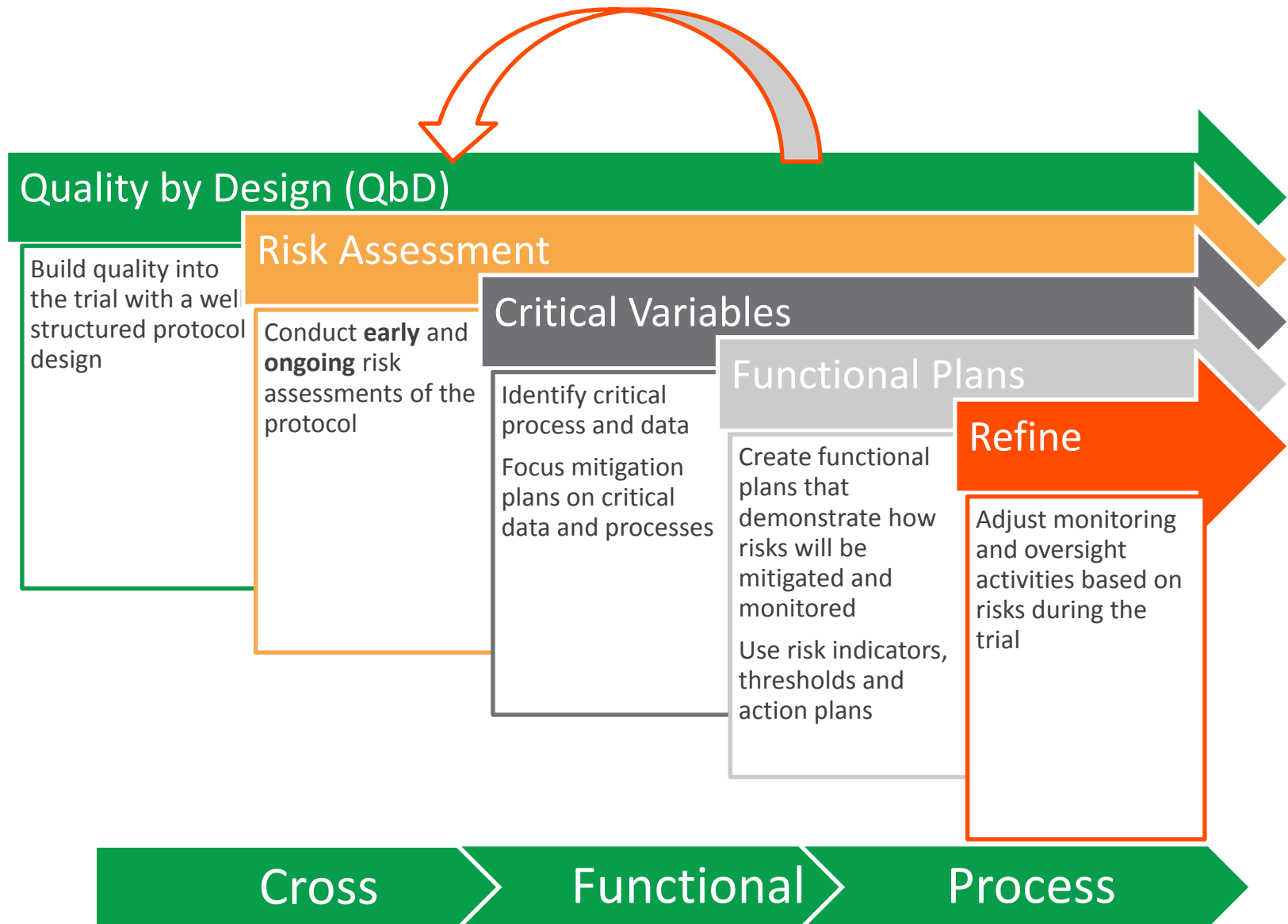
Quality built into the scientific and operational design and conduct of clinical trials

- › Focus on what matters
- › Critical Data AND Critical Processes that impact on:
  - Patient safety or
  - Data Integrity
  - GCP / Regulatory Compliance

Identify risks at the program, study, and site level in order to employ the appropriate level of monitoring

- Map the risks to appropriate monitoring plans
- Employ mechanisms to monitor important parameters (inclusive of Central monitoring activity)
- Use of technologies that enable effective oversight
- Targeted on-site interventions

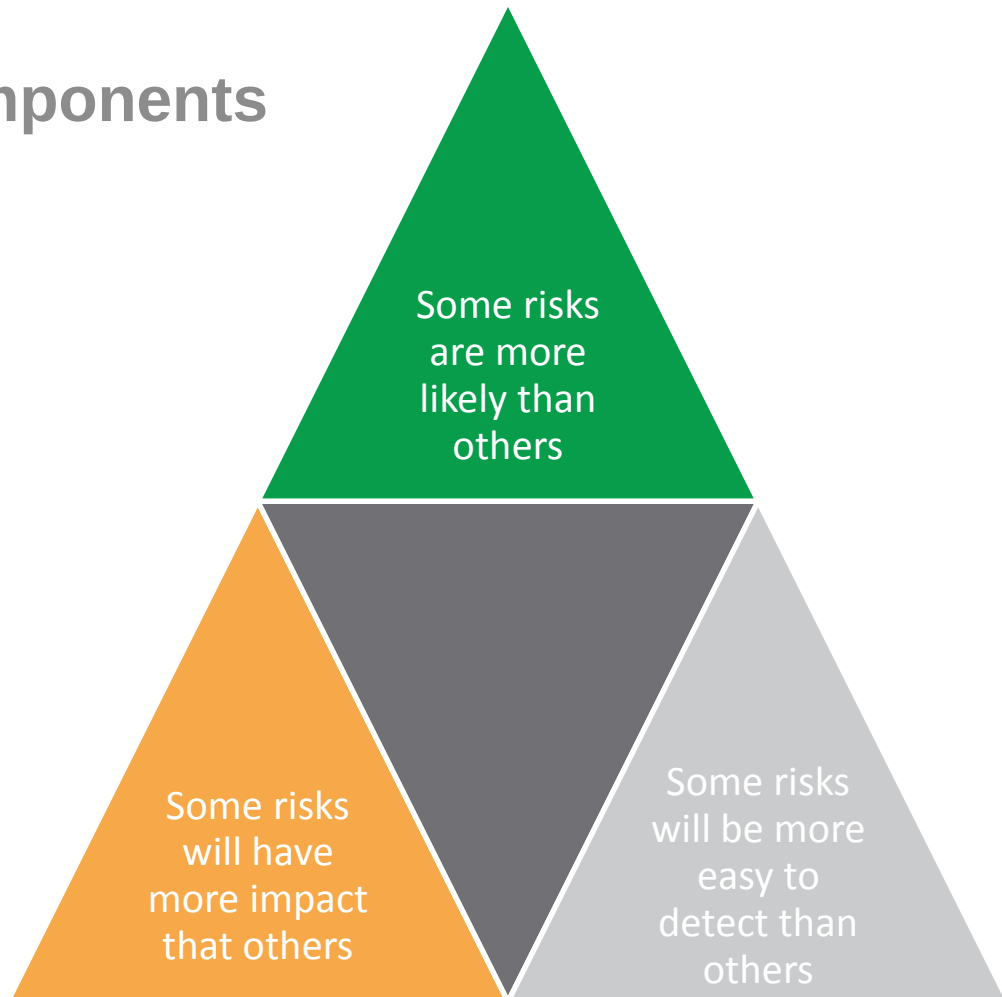
# QUALITY RISK MANAGEMENT



# DISSECTING RISK

## Three important components of Risk:

- **Probability**
- **Impact**
- **Detectability**



## MITIGATING RISK

If we can identify risk, we can plan strategies to detect and mitigate the risk and the impact

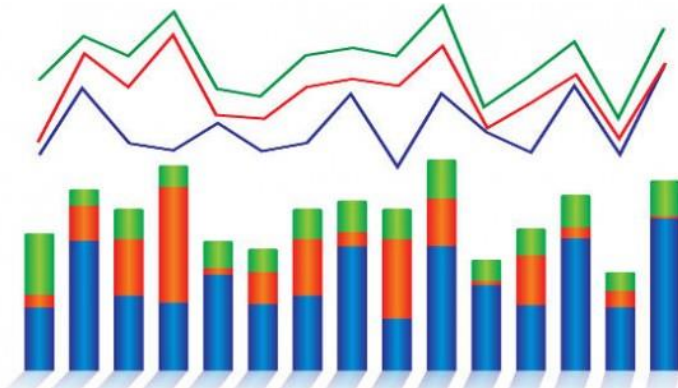
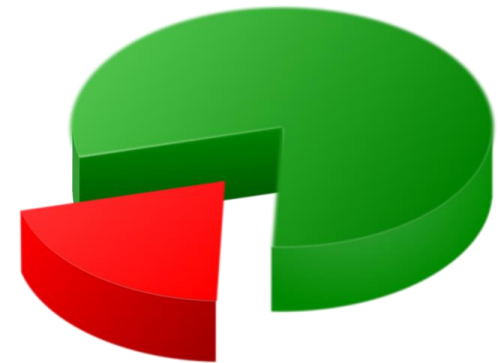




# OUTCOME OF THE RISK ASSESSMENT

The risk assessment process should:

- Identify and prioritise risk (score)
- Result in actionable outcomes
  - Mitigations
  - Plans
- Continuous, connected, traceable process



# CORE AND STUDY KRI'S

|            | KRIs                                                                                                                                                                                                                                                                             | Examples                                                                                                                                                                                                      | Design Impact                                                                                                                                                                                 |
|------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Core KRIs  | <ul style="list-style-type: none"> <li>Many KRIs used to detect site quality risk will be standard.</li> <li>Core KRIs are often associated with safety and performance, but they can also be surrogate markers for quality risk and should be monitored and managed.</li> </ul> | <ul style="list-style-type: none"> <li>AE rates</li> <li>Inclusion/ exclusion deviations</li> <li>Recruitment ratios</li> <li>Early term rates</li> <li>Data entry timeliness</li> <li>Query rates</li> </ul> | <ul style="list-style-type: none"> <li>Availability of historical data</li> <li>Ability to determine thresholds based on historical data</li> <li>Use of companion data</li> </ul>            |
| Study KRIs | <ul style="list-style-type: none"> <li>Designed to assess and monitor the critical data and processes for a study.</li> <li>KRIs may also change during the course of a study, due to risk factors changing as the study progresses e.g. once enrollment is complete.</li> </ul> | <ul style="list-style-type: none"> <li>Image quality assessment</li> <li>Therapy specific assessment scores</li> <li>Dose changes</li> </ul>                                                                  | <ul style="list-style-type: none"> <li>Threshold may be influenced by therapeutic area</li> <li>Thresholds likely to be based on population</li> <li>More likely to be exploratory</li> </ul> |

# CENTRALIZED DATA MONITORING

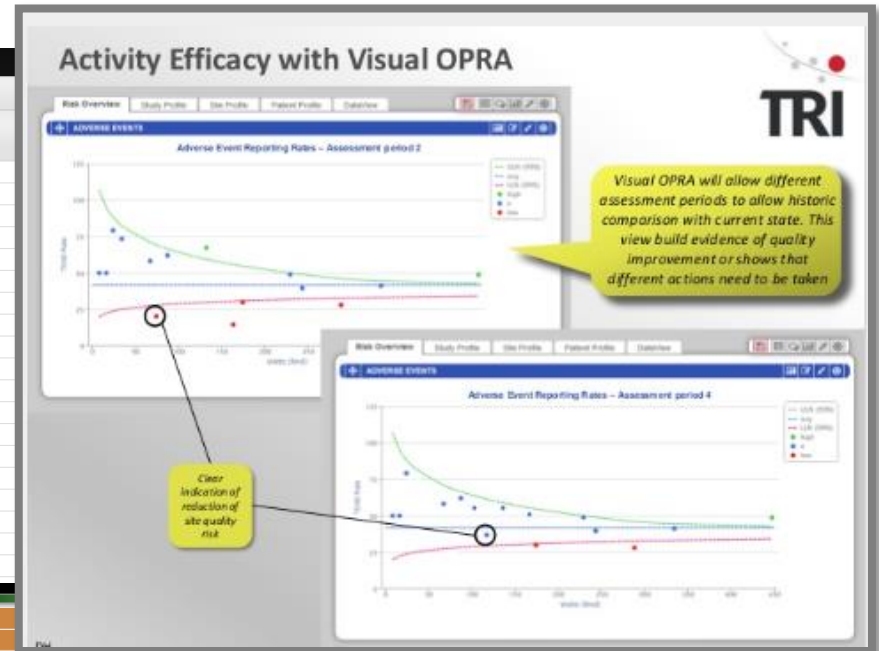
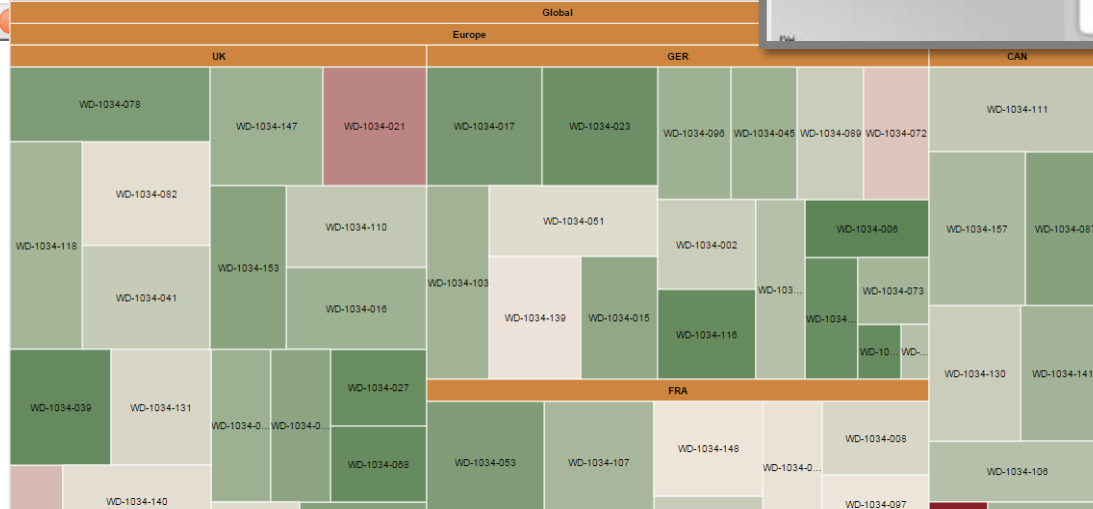
| Risk Signal           |                                                                                                                                                                                              |              |                     |                |                 |                   |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------------|----------------|-----------------|-------------------|
| KRI Category          | KRI Description                                                                                                                                                                              | Data Quality | Protocol Compliance | Subject Safety | Site Engagement | Subject Retention |
| Enrollment            | <ul style="list-style-type: none"> <li>Enrollment Rates</li> <li>Screen Failure (SF) Rate</li> <li>Reasons for SF</li> <li>Discontinuation Ratio</li> <li>Discontinuation Reasons</li> </ul> | √            |                     |                | √               | √                 |
| Safety                | <ul style="list-style-type: none"> <li>AE Reporting Rate</li> </ul>                                                                                                                          | √            | √                   | √              | √               |                   |
| Data Quality          | <ul style="list-style-type: none"> <li>Query Rate</li> <li>Query Response Time</li> </ul>                                                                                                    | √            | √                   |                | √               |                   |
| Study Plan Compliance | <ul style="list-style-type: none"> <li>Data Entry Timeliness</li> </ul>                                                                                                                      | √            | √                   | √              | √               |                   |
| Protocol Compliance   | <ul style="list-style-type: none"> <li>Protocol Deviation Rate</li> <li>Protocol Deviation Type</li> <li>Subject Visit Compliance</li> </ul>                                                 | √            | √                   | √              | √               |                   |
| Misconduct            | <ul style="list-style-type: none"> <li>Digit Preference</li> <li>Mean Value</li> </ul>                                                                                                       | √            | √                   | √              |                 |                   |
| Unreliable Assessment | <ul style="list-style-type: none"> <li>Laboratory Sample Quality</li> </ul>                                                                                                                  | √            | √                   |                | √               |                   |

# RISK-BASED MONITORING KRI'S

Drag a column header here to group 2

|                                                                                 | Site        | <span style="border: 1px solid red; border-radius: 50%; padding: 2px;">1</span> BP | AE | CM | DV | MH | PE | EDC | QC | Rand. Subj |
|---------------------------------------------------------------------------------|-------------|------------------------------------------------------------------------------------|----|----|----|----|----|-----|----|------------|
| <span style="border: 1px solid red; border-radius: 50%; padding: 2px;">3</span> | WD-1034-142 |                                                                                    |    |    |    |    |    |     |    | 12         |
|                                                                                 | WD-1034-021 |                                                                                    |    |    |    |    |    |     |    | 15         |
|                                                                                 | WD-1034-075 |                                                                                    |    |    |    |    |    |     |    | 12         |
|                                                                                 | WD-1034-012 |                                                                                    |    |    |    |    |    |     |    | 13         |
|                                                                                 | WD-1034-072 |                                                                                    |    |    |    |    |    |     |    | 11         |
|                                                                                 | WD-1034-148 |                                                                                    |    |    |    |    |    |     |    | 13         |
|                                                                                 | WD-1034-051 |                                                                                    |    |    |    |    |    |     |    | 15         |
|                                                                                 | WD-1034-046 |                                                                                    |    |    |    |    |    |     |    | 10         |
|                                                                                 | WD-1034-139 |                                                                                    |    |    |    |    |    |     |    | 14         |
|                                                                                 | WD-1034-089 |                                                                                    |    |    |    |    |    |     |    | 11         |
|                                                                                 | WD-1034-097 |                                                                                    |    |    |    |    |    |     |    | 8          |
|                                                                                 | WD-1034-041 |                                                                                    |    |    |    |    |    |     |    | 16         |
|                                                                                 | WD-1034-154 |                                                                                    |    |    |    |    |    |     |    | 4          |
|                                                                                 | WD-1034-082 |                                                                                    |    |    |    |    |    |     |    | 16         |
|                                                                                 | WD-1034-140 |                                                                                    |    |    |    |    |    |     |    | 13         |
|                                                                                 | WD-1034-131 |                                                                                    |    |    |    |    |    |     |    | 14         |
|                                                                                 | WD-1034-008 |                                                                                    |    |    |    |    |    |     |    | 10         |
|                                                                                 | WD-1034-117 |                                                                                    |    |    |    |    |    |     |    | 9          |
|                                                                                 | WD-1034-110 |                                                                                    |    |    |    |    |    |     |    | 14         |

Overall Risk Score View



# SOURCES OF TRUTH (SOT)

- EDC
- CTMS (AC MAC)
- Excel
- SharePoint
- eTMF

The image displays three overlapping screenshots of the Advanced Clinical software interface. The top screenshot shows the 'Project Site' overview with sections for Project Announcements, Project Milestones, and Project Team. The middle screenshot shows a 'Site Management' document list with entries like 'Site 001 - Meeting Material (v0.1)', 'Site 001 - Note to File (v0.1)', and 'Site 001 - Monitoring Visit Confirmation Letter (v0.1)'. The bottom screenshot shows a calendar view for January 2015 and a data table with 17,324 entries.

**Calendar View (January 2015):**

| Mon | Tue | Wed |
|-----|-----|-----|
|     | 29  | 30  |
| 5   | 6   | 7   |
| 12  | 13  | 14  |

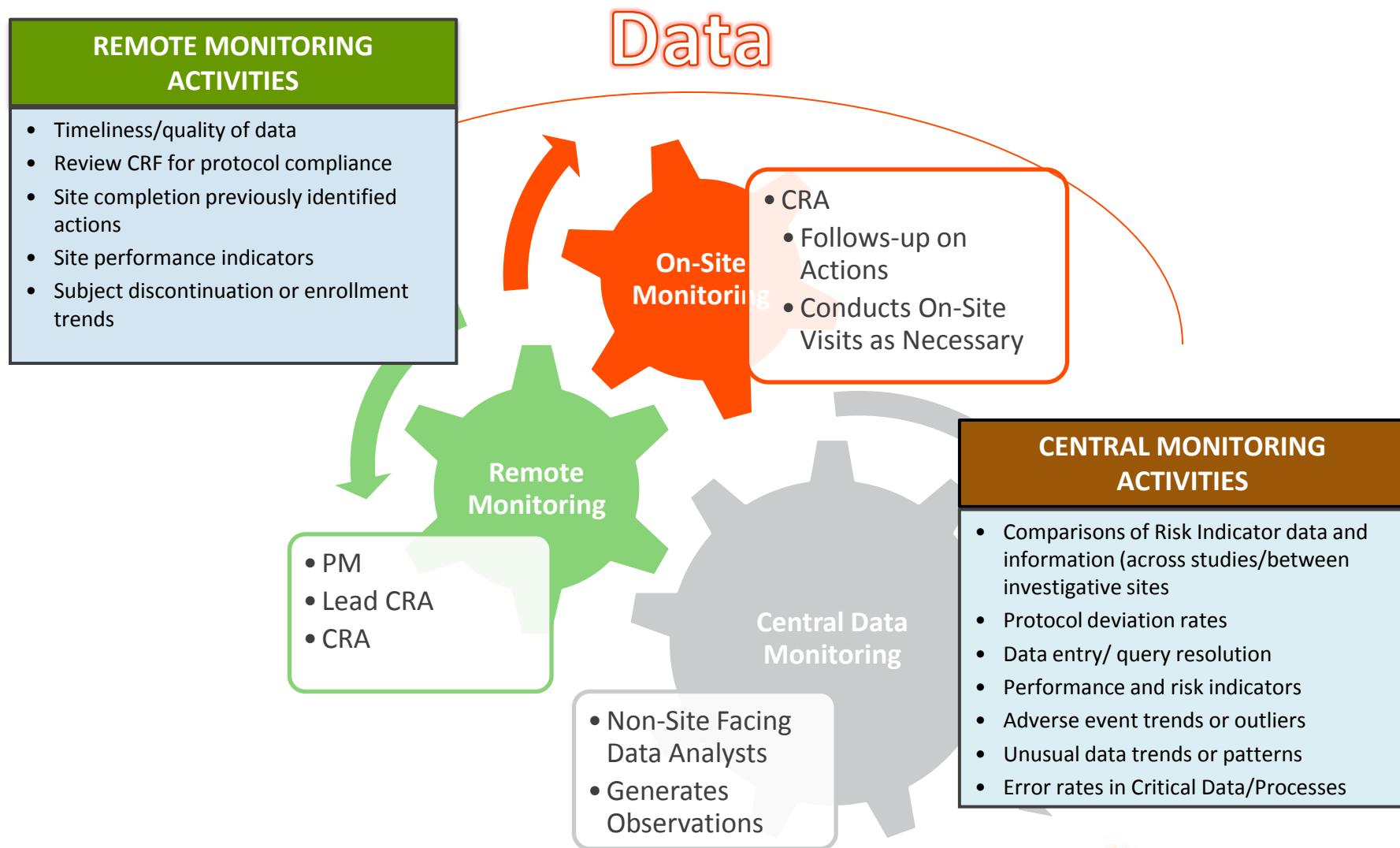
**Data Table (Showing 1 to 100 of 17,324 entries):**

| Country       | Site # | Site Name | Subject  | Visit     | Page        | Page Status | Field Type           | Field                           | Field Value | Marked SDV? | SDV Marked Date          | SDV Performed By |
|---------------|--------|-----------|----------|-----------|-------------|-------------|----------------------|---------------------------------|-------------|-------------|--------------------------|------------------|
| United States | 001    | ICON      | 001-1106 | Screening | Study Visit | DM Reviewed | Date                 | Visit Date:                     | 11-NOV-2015 | Yes         | 08-DEC-2015 08:58:23 CST | Kim Sauerwein    |
| United States | 001    | ICON      | 001-1106 | Screening | Study Visit | DM Reviewed | Radiolist Horizontal | Was this study visit performed? | YES         | Yes         | 08-DEC-2015 08:58:23 CST | Kim Sauerwein    |

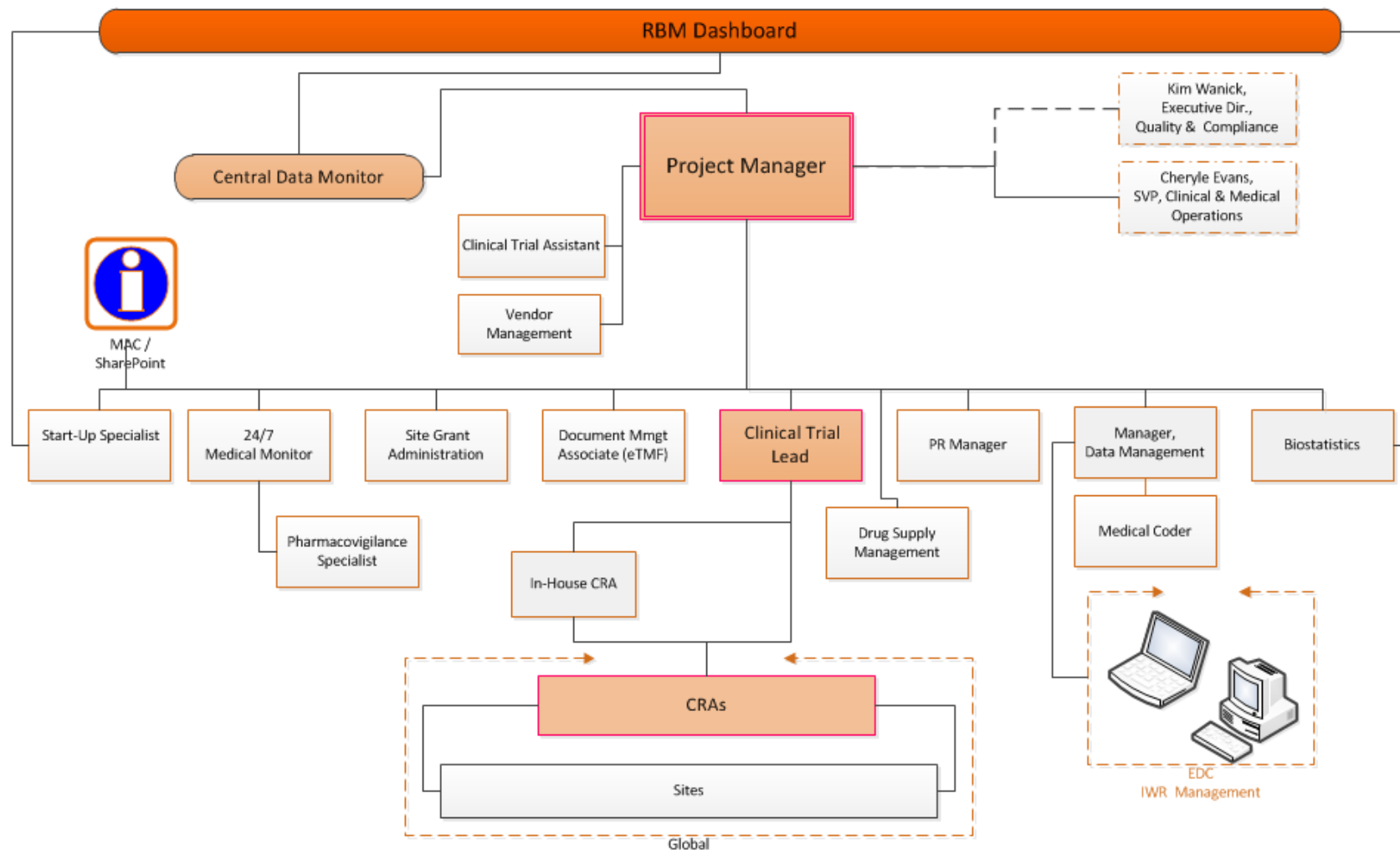
# ELEMENTS OF FUNCTIONAL PLANS

|                          | Central Monitoring                                              | Clinical Monitoring Critical Data                                                                                                          | Clinical Monitoring Critical Process                                                                                                         |
|--------------------------|-----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
| What will be reviewed?   | KRIs                                                            | AE Term, start date                                                                                                                        | Sample Management                                                                                                                            |
| How it will be reviewed? | OPRA                                                            | On site                                                                                                                                    | Remote contact [change in staff]<br>Onsite [SIV]<br>Remote/onsite<br>[Response to trigger]                                                   |
| Frequency of review      | Monthly                                                         | per guideline for study risk level                                                                                                         | At SIV on change of site staff following observations from CM                                                                                |
| Level of review          | KRI and Data review                                             | SDR/SDV - per guideline study risk level                                                                                                   | Discussion with site<br>Facility review                                                                                                      |
| Response to triggers     | Green rising<br>Amber rising<br>Amber static/<br>decreasing Red | As direct observation: defined as part of guideline (e.g. increase level of SDR if errors found )<br>In relation to KRIs – aligned with CM | As direct observation :-<br>Dependent on observation – covered either by Guidelines or Monitoring Plan In relation to KRIs - aligned with CM |
| Traceability of review   | Actions documented in OPRA                                      | Actions documented in CTMS                                                                                                                 | Actions documented in CTMS                                                                                                                   |

# RBM STRUCTURE & FUNCTIONAL ROLES



# PROJECT TEAM SCHEMATIC





# CENTRAL DATA MONITORING

**What is it?**

The ongoing review and trend analysis of data across sites and studies to support a dynamic, flexible and targeted site monitoring strategy and high quality study execution

**How does it work?**

- Monitor risk signal detection with OPRA KRI reports
- Report data issues to site monitors to support site monitoring strategy

**Who does it?**

- Central Data Monitor – A functional role filled by research staff with analytical skill sets by training and experience

**Technology**

- Alerts and triggers
- Visualizations that support efficient reviews
- Workflow manager

# ADVANCED CLINICAL RISK BASED MONITORING ACTIVITIES

## Clinical Risk Management

- Risk oversight throughout the entire study
- Indirect site relationship
- Direct relationship with Centralized Monitoring, Remote Monitoring and On-site Monitoring

## Centralized Monitoring

- Analytics data monitoring from FPI to database lock
- Indirect site relationship
- Direct relationship with Clinical Risk Management , Remote Monitoring and On-site Monitoring

## Remote Monitoring Visit

- Subject level data and site metrics review from FPI to database lock
- Virtual site relationship (telephone and email)
- Direct relationship with Clinical Risk Management and On-site Monitor\*, Centralized Monitoring

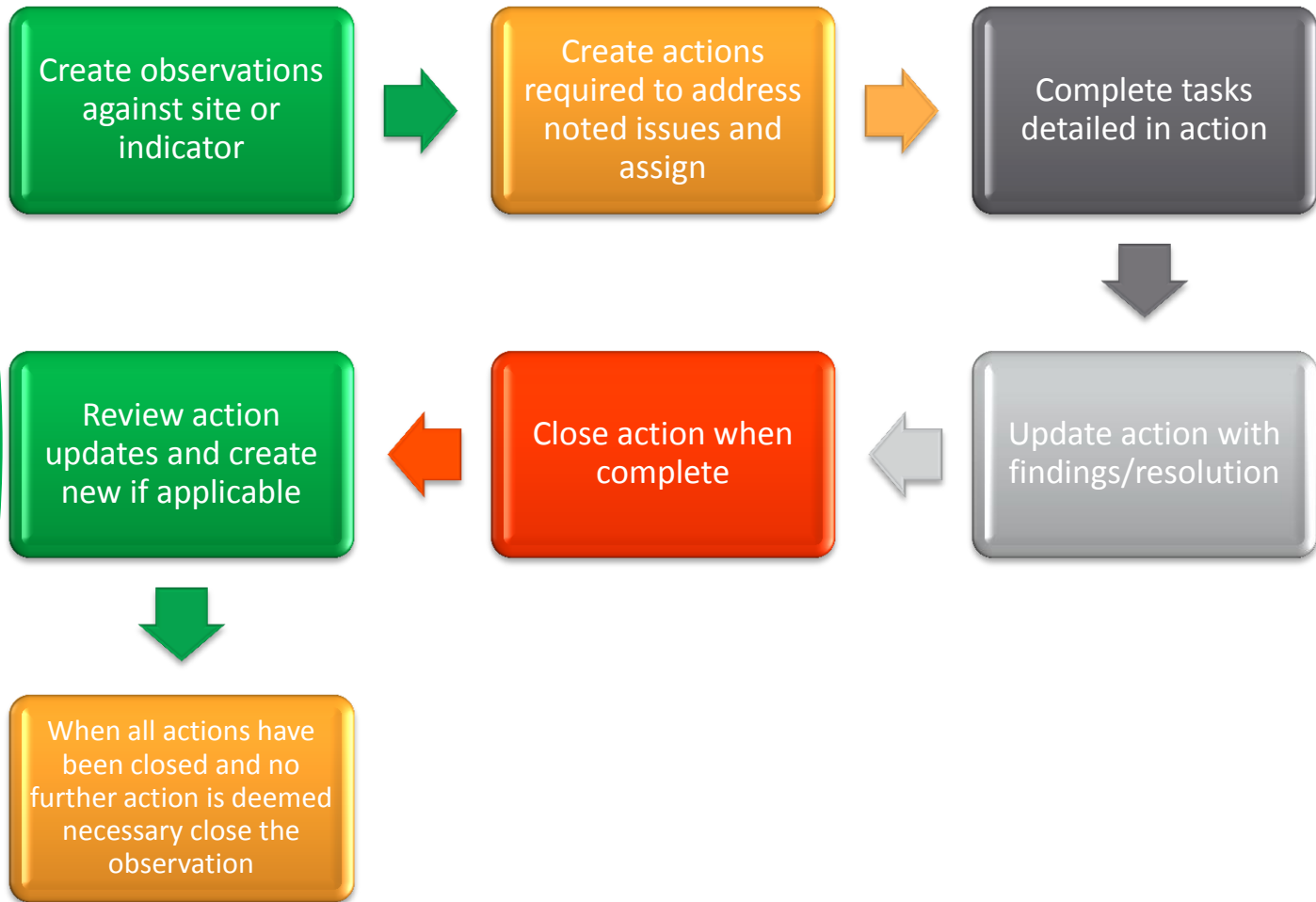
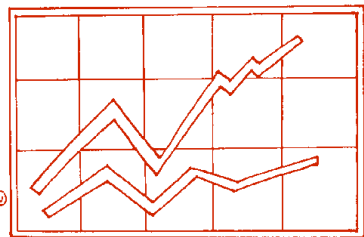
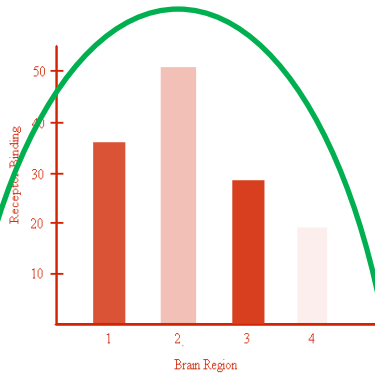
## Remote Site Contact

- Triggered follow-up and site management from FPI to database lock
- Virtual site relationship (telephone and email)
- Direct relationship with Clinical Risk Management and On-site Monitor\* and Centralized Monitoring

## On-site Monitoring Visit

- Informed consent and IP and source document review
- Direct site relationship
- Direct relationship with Clinical Risk Management and Remote Monitor\* and Centralized Monitoring

# TRI OPRA ANALYTICAL TOOL: OBSERVATIONS & ACTIONS

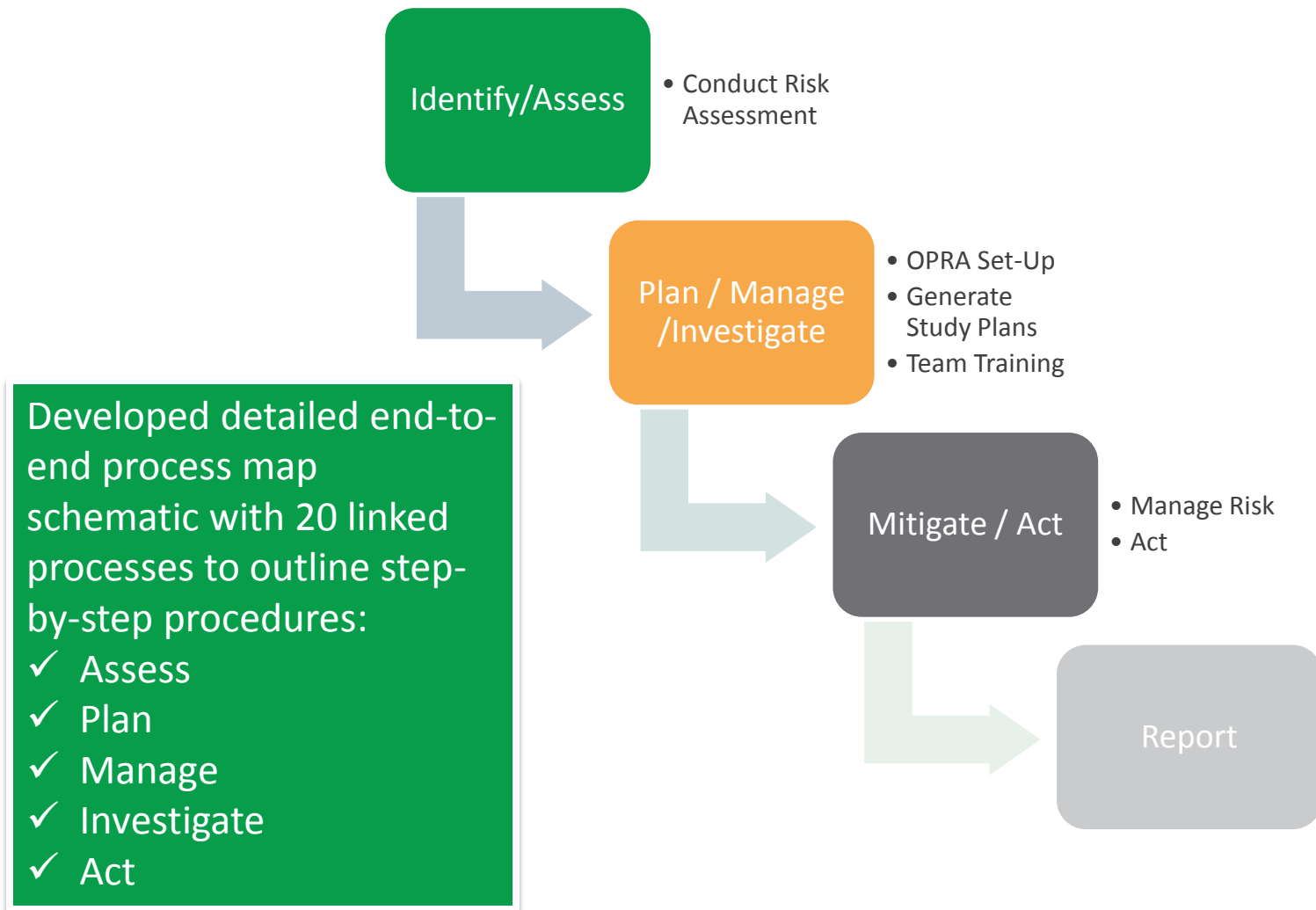


# MINIMUM REQUIREMENTS FOR ONSITE VISITS AND SDV AND SDR

| Minimum Requirement                                                                                                                                                                                                  | High Risk<br>(e.g., Ph I/II)                                                        | Moderate Risk<br>(e.g., Ph III)                                                      | Low Risk<br>(e.g., Ph IV)                                                            |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Site Contact/Oversight <ul style="list-style-type: none"> <li>1<sup>st</sup> On-site Visit</li> <li>Max window for On-Site Visit</li> <li>Remote Monitoring Schedule</li> <li>Central Monitoring Schedule</li> </ul> |  |  |  |
| Individual Subject Review                                                                                                                                                                                            |                                                                                     |                                                                                      |                                                                                      |
| Core Critical Processes <ul style="list-style-type: none"> <li>Consent</li> <li>IMP Supply Management</li> </ul>                                                                                                     |                                                                                     |                                                                                      |                                                                                      |
| Core Critical Data <ul style="list-style-type: none"> <li>SAE</li> <li>AE</li> <li>Eligibility</li> <li>Prohibited Con Meds</li> <li>IP Accountability</li> <li>Non-Critical Data</li> </ul>                         |                                                                                     |                                                                                      |                                                                                      |

**AC Policy will require a minimum SDV and SDR On-Site Monitoring determined by study Risk Assessment**

# END-TO-END PROCESSES



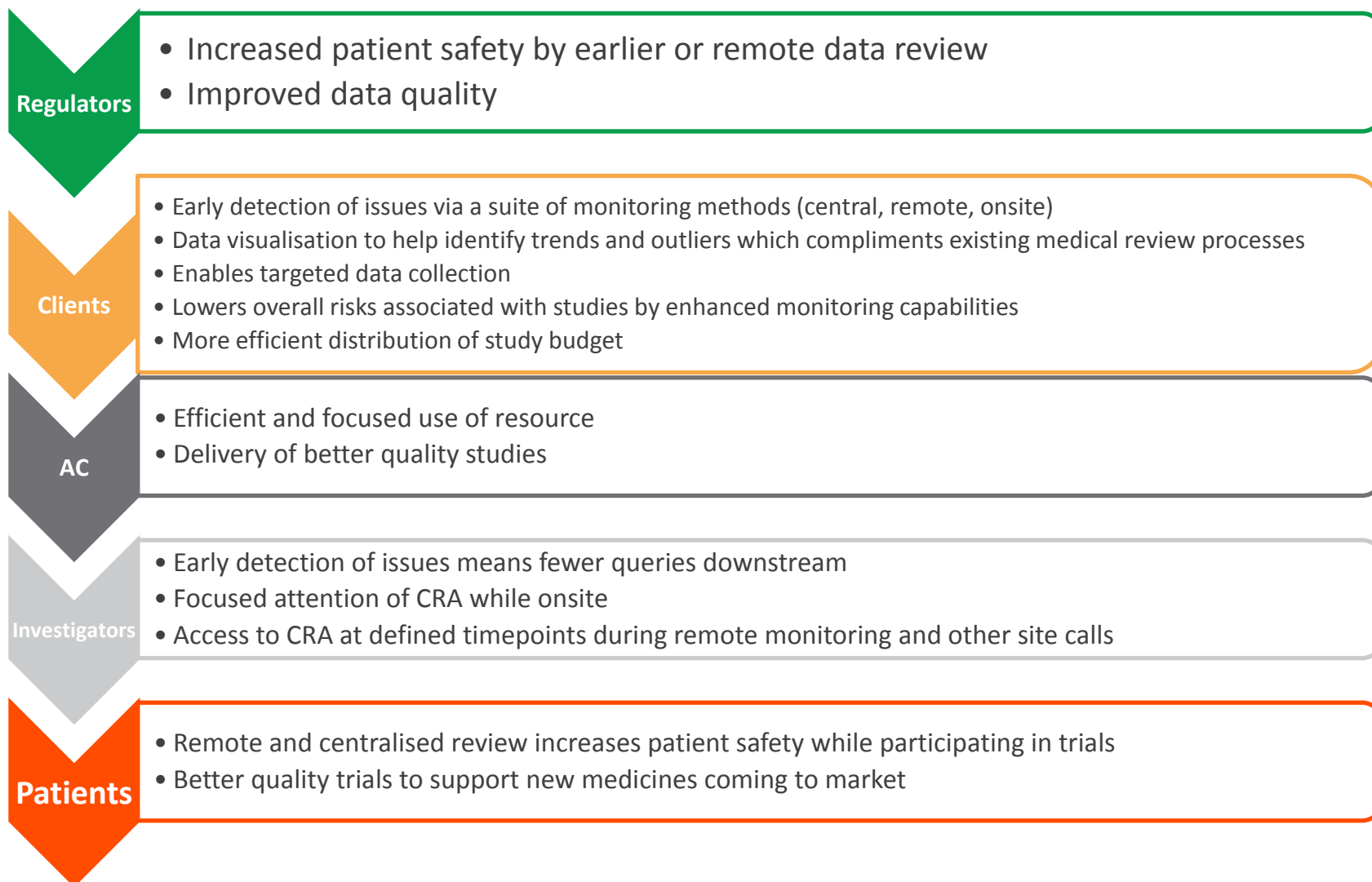
# RBM: SITE CONSIDERATIONS

## Site Implications

- Increased involvement with the quality control of data capture and entry
- More time spent on quality management, process improvements, and corrective actions
- High priority on data entry timelines
- Communication method flexibility



# RBM: IMPACT TO INDIVIDUAL STAKEHOLDERS



## FINANCIAL CONSIDERATIONS

### Direct Service Costs

- Cost Neutral vs. Traditional costing

### Pass Through Costs

- Cost Efficiencies related to reduced number of on-site visits



# CONSIDERATIONS FOR RBM READINESS



# RBM STUDY CONSIDERATIONS



Study Phase

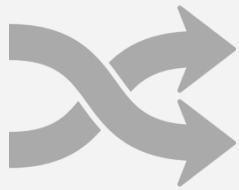


Global  
Study(ies)  
Country Mix



High  
Volume of  
Data

# RBM READINESS CONSIDERATIONS



Change  
Management



RBM  
Analytical  
Tool

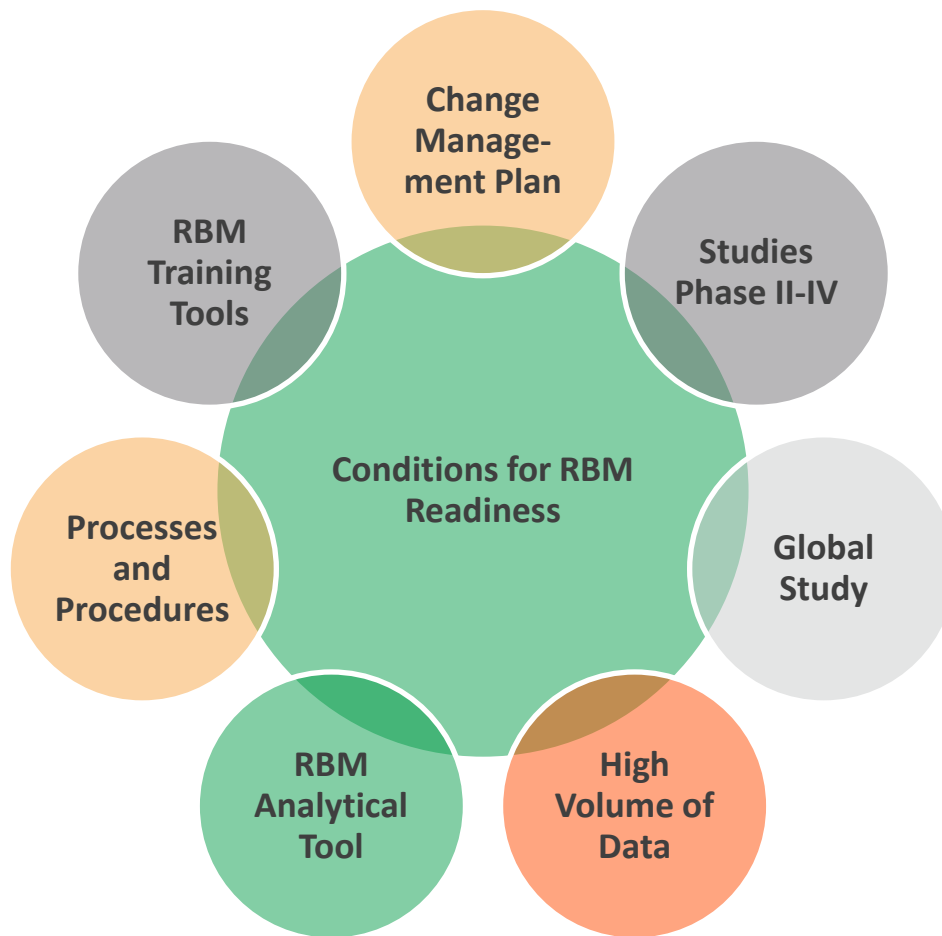


Process &  
Procedures



RBM Training  
Tools

# CONDITIONS FOR RISK BASED MONITORING READINESS



## IN SUMMARY

- RBM is here to stay
  - Consensus that DDM will enhance quality, improve safety & reduce onsite monitoring costs
  - Technology is now available to assess data
  - Regulators onboard and providing guidance and support
- Change Management is a hallmark of achieving success
- Stakeholders are in every area of the clinical research arena
- Sites are an integral part of implementing a successful RBM program



# QUESTIONS/COMMENTS/THOUGHTS



## ADDITIONAL LINKS

- <http://www.transceleratebiopharmainc.com/resources/>
- <http://www.fda.gov/downloads/Drugs/.../Guidances/UCM269919.pdf>
- <http://www.icr-global.org/crfocus/2012/23-1/understanding-risk-based-monitoring/>
- [http://assets1.csc.com/dvc/downloads/DIA\\_Defining\\_Risk\\_Based\\_Monitoring\\_Program.pdf](http://assets1.csc.com/dvc/downloads/DIA_Defining_Risk_Based_Monitoring_Program.pdf)
- <http://www.cognizant.com/InsightsWhitepapers/Risk-based-Monitoring-Strategies-for-Improved-Clinical-Trial-Performance.pdf>

# BE ADVANCED.

ADVANCED SOLUTIONS FOR A BETTER CLINICAL EXPERIENCE.

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# OPERATIONALIZING KEY RISK INDICATORS



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# INTRODUCTION

- KRI Selection
  - Process and considerations
- Defining KRIs
- Combining Data Sources
- Creating Flat Files

# KRI SELECTION PROCESS

Cross-functional committee formed in 2014 in pathfinding mission to learn about RBM and create tools for implementing

- Based on Transcelerate and FDA guidance
- Pathfinding

Began with list of anything considered critical to the quality of a study (subject safety, data quality, etc.)

Compared with published lists of KRIs and worked with vendor to narrow list to core set of risk indicators that can be used for most studies

# KRI SELECTION CONSIDERATIONS

- Overall Goal – looking for trends at site level (not patient level)
- Ability to collect data to support KRI consistently across studies
  - May need to change current processes
  - e.g. protocol deviations may be collected in different sources (EDC, CTMS, CRA trackers), able to determine visit out of window
- Risk indicator vs. performance indicator
  - Risk indicators are variables considered to influence the quality of a study and can be used to detect potential issues or risk.
  - Performance indicator measures how well something is being done, may or may not indicate risk
    - e.g. site personnel turnover
- Core KRIs can be used for most studies. Study specific KRIs may be identified during a risk assessment of the study

# CORE KRIs

| KRI Category          | KRI Description                                                                                                                                                                             | Definition                                                                                                                                                                                                                                                                             |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Enrollment            | <ul style="list-style-type: none"> <li>Enrollment Rates</li> <li>Screen Failure (SF) Rate</li> <li>Reasons for SF</li> <li>Discontinuation Rate</li> <li>Discontinuation Reasons</li> </ul> | <ul style="list-style-type: none"> <li>➤ Number enrolled per unit of time</li> <li>➤ % of screened subjects who SF</li> <li>➤ Box plot of reasons for SF (if captured)</li> <li>➤ % of enrolled subjects who discontinue</li> <li>➤ Box plot of reasons for discontinuation</li> </ul> |
| Safety                | <ul style="list-style-type: none"> <li>AE Reporting Rates</li> <li>SAE Reporting Rates</li> </ul>                                                                                           | <ul style="list-style-type: none"> <li>➤ Number of AEs (or SAEs) per time on study</li> </ul>                                                                                                                                                                                          |
| Data Quality          | <ul style="list-style-type: none"> <li>Query Rate</li> <li>Query Response Time</li> </ul>                                                                                                   | <ul style="list-style-type: none"> <li>➤ Number of queries per 1000 data points</li> <li>➤ Mean number of days from query issue date until resolved</li> </ul>                                                                                                                         |
| Study Plan Compliance | <ul style="list-style-type: none"> <li>Data Entry Timeliness</li> </ul>                                                                                                                     | <ul style="list-style-type: none"> <li>➤ Mean number of days from subject visit until data entry</li> </ul>                                                                                                                                                                            |
| Protocol Compliance   | <ul style="list-style-type: none"> <li>Protocol Deviation Rate</li> <li>Protocol Deviation Type</li> <li>Subject Visit Compliance</li> </ul>                                                | <ul style="list-style-type: none"> <li>➤ Number of deviations per time on study</li> <li>➤ Box plot of reasons for deviation</li> <li>➤ % of visits out of protocol-defined window</li> </ul>                                                                                          |
| Misconduct            | <ul style="list-style-type: none"> <li>Digit Preference</li> <li>Mean Value</li> </ul>                                                                                                      | <ul style="list-style-type: none"> <li>➤ % of values (systolic BP) ending in 0</li> <li>➤ Mean value for given variable (BP, age, lab)</li> </ul>                                                                                                                                      |
| Unreliable Assessment | <ul style="list-style-type: none"> <li>Laboratory Sample Quality</li> </ul>                                                                                                                 | <ul style="list-style-type: none"> <li>➤ % of non-evaluable lab samples</li> </ul>                                                                                                                                                                                                     |

# DEFINING KRIs

| KRI Description                                                                              | Formula                                                                                                                                                                                                                                                        | Considerations                                                                                                                                                                                                        |
|----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>AE Reporting Rate:<br/>Number of AEs per time on study, compared to study population.</p> | <p>A = Total # of AEs for all subjects at the site<br/>B = Total time on trial for all subjects at the site (Sum of ( date of last (most recent) visit for each patient - Date first dose)<br/><br/>X Axis = Subject Months<br/>Y Axis = AEs/subject Month</p> | <ul style="list-style-type: none"> <li>How to define time on trial? <ul style="list-style-type: none"> <li>Use discontinuation date? Most recent visit date?</li> <li>Subject months vs. years</li> </ul> </li> </ul> |
| <p>Query Rate:<br/>Cumulative queries / 1000 data points / Site</p>                          | <p>A = Total # of queries accumulated to date for a given site<br/>B = Total number data points submitted for that site /1000<br/><br/>X axis = datapoint (1000s)<br/>Y axis = query rate</p>                                                                  | <ul style="list-style-type: none"> <li>How to get total number of data points for subject or site? Not standard report in some EDC systems (e.g. Rave)</li> <li>Consider all queries? System vs. manual</li> </ul>    |

# DATA SOURCE CONSIDERATIONS

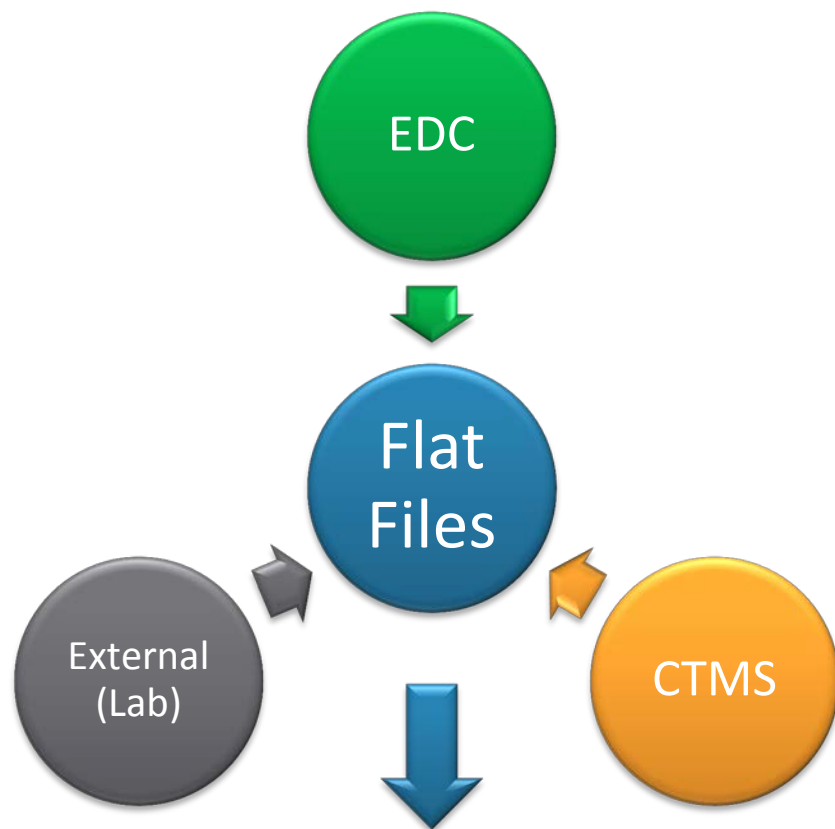


# DATA SOURCE CONSIDERATIONS

- Data from multiple sources
  - EDC, CTMS, external vendor data
  - Identify person or function responsible for
  - Coordinate with different functional areas (DM, clinical, stats, safety)
- Consistent subject ID, site ID, etc. across sources
- Ensure needed data captured in order to use KRI (e.g. deviation categories)



# FLAT FILES



- Comma, tab, or pipe-delimited files used for calculation of KRI and Data Review
  - 11 flat files supported 16 KRIs
- Programmed majority of datasets in SAS and modified external CSV files
- Flat file contents (variable names, formats) must stay same during course of study
- Test data used to develop and validate KRIs in OPRA

| SUBJID | STUDYID | SITEID | COUNTRY | AGE | SEX | RFSTDTC   | STATUS    | Etc. |
|--------|---------|--------|---------|-----|-----|-----------|-----------|------|
| 1001   | ABC-001 | 001    | USA     | 34  | M   | 10JUN2015 | COMPLETED |      |

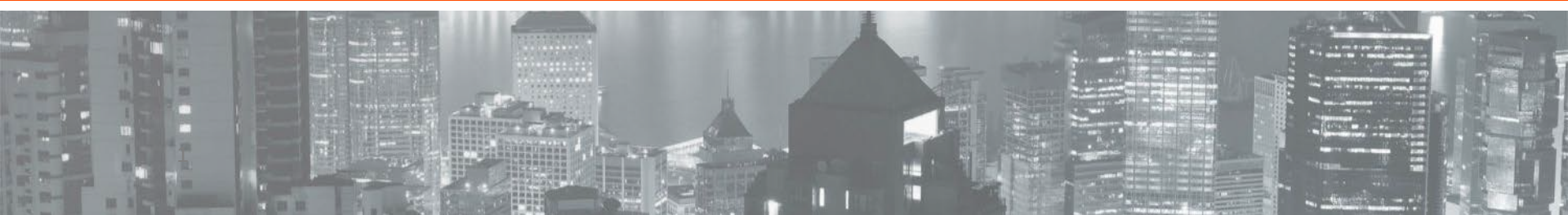
## TAKEAWAYS

- Be open to pathfinding
- Cross-functional collaboration very important
- When selecting KRIs, focus on the big picture
- Technology is changing rapidly

# VISUAL/ANALYTICAL TOOL DEMO



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PHUSE SINGLE-DAY EVENT  
21 JULY 2016



## GOAL OF THE DEMO

- Demonstrate functionality of a visual analytic tool for RBM
- Identify sites with high overall risk scores
- Drill down to KRI visualizations
- Identify outlier sites
- Evaluate level of risk (prioritize)
  - Red = outlier, not necessarily bad
- Decide on action plan
- Note: Central data reviewer must have strong analytic skills

OPRA from Triumph Research Intelligence (TRI)

## SOME POINTS TO CONSIDER

- The goal tool is to identify outlier sites, not subjects
- Data are typically refreshed monthly
- Why not real-time?
  - There is a cost associated with each update. The data files have to be downloaded and massaged, then uploaded into the tool.
  - Once an update is run, the central data reviewer needs time to review the new results and create observations, and the CRAs need time to perform any needed actions.
  - Unless a study enrolls very quickly, results will not change much from day to day or even week to week.

OPRA can show changes over time: Are interventions working to reduce risk?

## THE CLINICAL TRIAL FOR THE DEMO

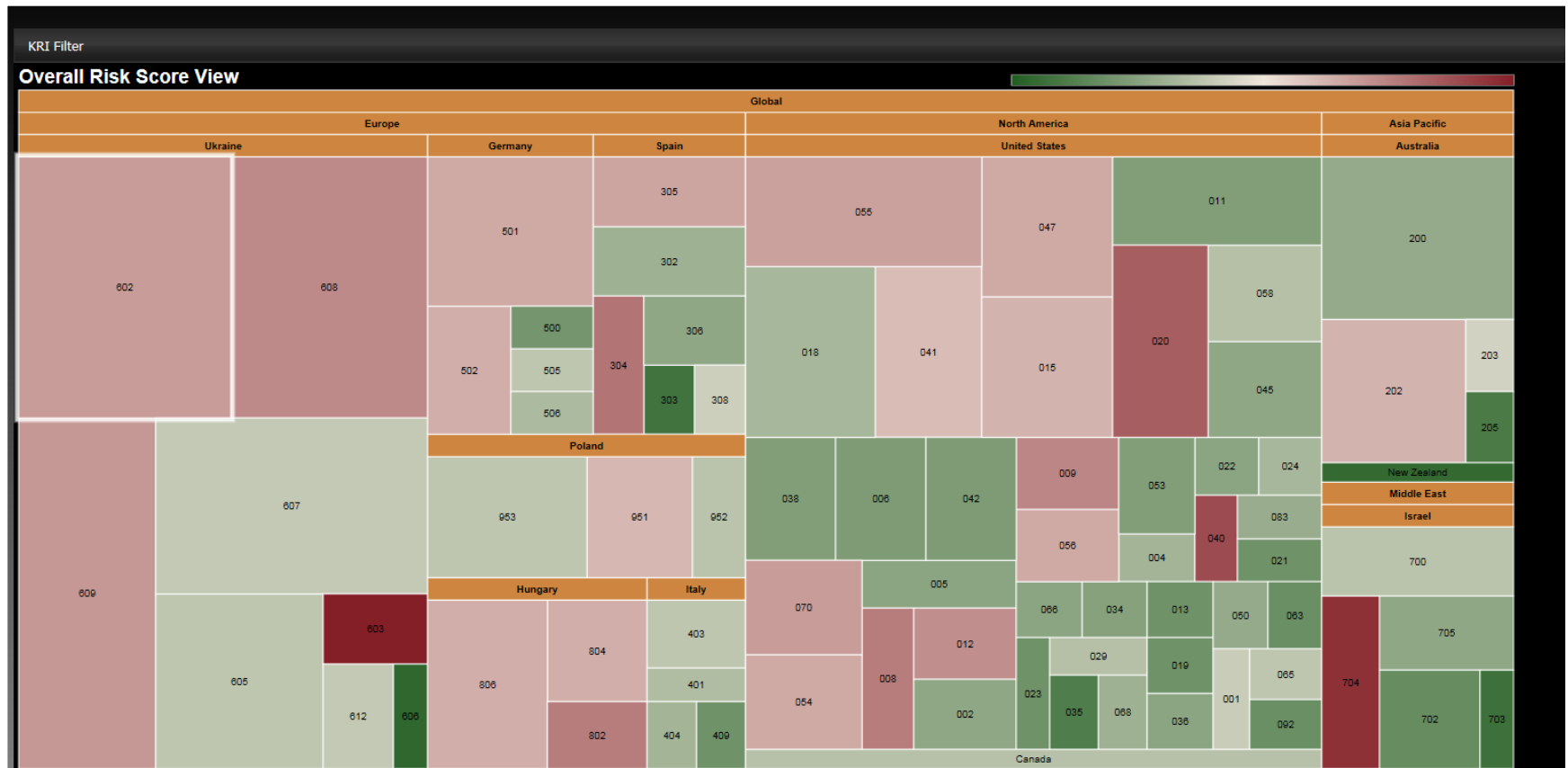
- Global multi-center Phase 3 ongoing clinical trial
- Randomized, placebo-controlled, parallel group
- 2:1 randomization
- Sample size: 240 completers

## HEAT MAP (STUDY PROFILE)

- Rectangle for each site
- Organized by region, country
- Sites with more subjects have a larger area
- Dark red = high risk score
- Dark green = low risk score

Is there a region that stands out?

# HEAT MAP (STUDY PROFILE)





# RISK OVERVIEW REPORT

- Sites are sorted by risk score, with highest risk at the top
- Information for each site:
  - “Risk” By KRI (red, amber, yellow, green)
  - Number of randomized subjects
  - Overall Risk Score
  - Country

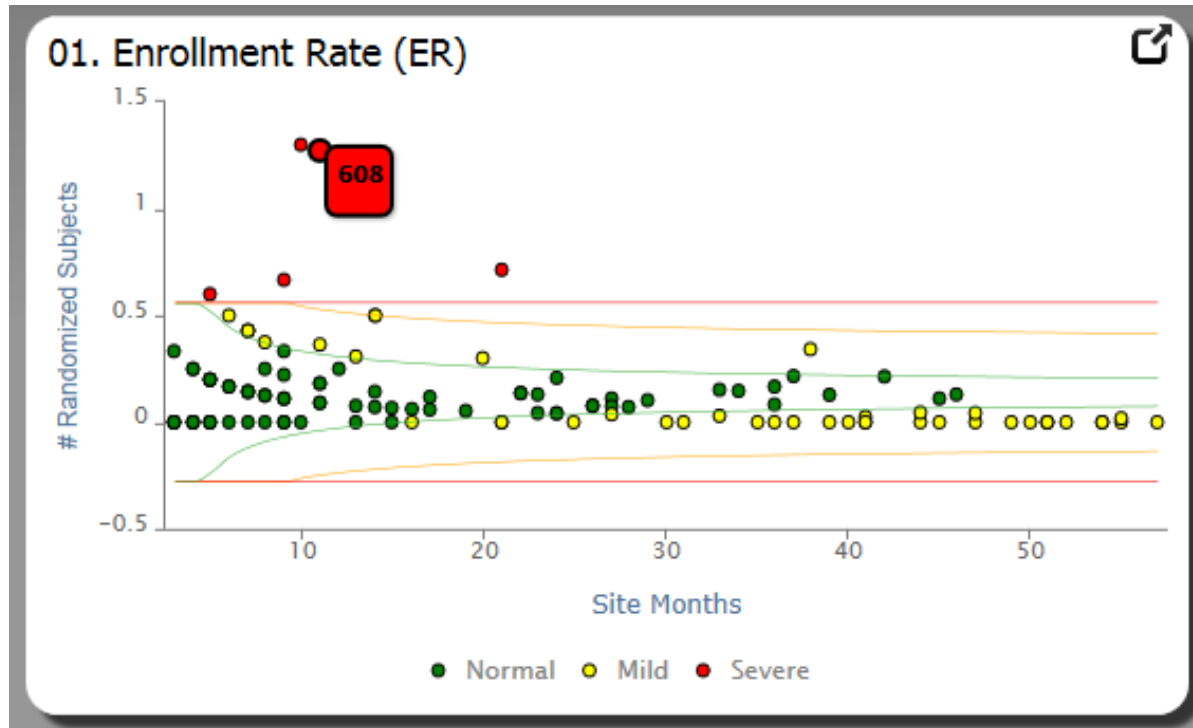
Focus on sites with some minimum number of subjects

# RISK OVERVIEW REPORT

| Site | ER | SFR | DR | AE | PD | DET | SAE | QRT | EDP | LSQ | MVO | Rand. Subj | Score | Country       |
|------|----|-----|----|----|----|-----|-----|-----|-----|-----|-----|------------|-------|---------------|
| 603  | -  | -   | -  | -  | ●  | -   | -   | ●   | ●   | -   | -   | 2          | 89    | Ukraine       |
| 704  | ●  | ●   | ●  | -  | ●  | -   | -   | ●   | ●   | ●   | ●   | 3          | 85    | Israel        |
| 040  | ●  | ●   | -  | -  | -  | -   | -   | ●   | -   | ●   | -   | 1          | 79    | United States |
| 020  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 5          | 75    | United States |
| 304  | ●  | -   | -  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 2          | 70    | Spain         |
| 008  | ●  | ●   | -  | -  | ●  | -   | -   | ●   | ●   | ●   | ●   | 2          | 68    | United States |
| 802  | ●  | -   | -  | -  | ●  | ●   | -   | -   | ●   | ●   | ●   | 2          | 68    | Hungary       |
| 009  | ●  | -   | -  | -  | ●  | ●   | -   | ●   | ●   | ●   | ●   | 2          | 66    | United States |
| 608  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 14         | 65    | Ukraine       |
| 012  | ●  | ●   | -  | -  | ●  | -   | -   | ●   | ●   | ●   | ●   | 2          | 64    | United States |
| 609  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 13         | 62    | Ukraine       |
| 070  | ●  | ●   | ●  | ●  | -  | ●   | ●   | ●   | ●   | ●   | ●   | 3          | 61    | United States |
| 602  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 15         | 61    | Ukraine       |
| 055  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 7          | 60    | United States |
| 305  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 3          | 59    | Spain         |
| 056  | ●  | ●   | -  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 2          | 58    | United States |
| 047  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 5          | 58    | United States |
| 054  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 3          | 58    | United States |
| 501  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 7          | 58    | Germany       |
| 804  | ●  | ●   | ●  | -  | ●  | ●   | -   | -   | ●   | ●   | ●   | 3          | 57    | Hungary       |
| 502  | ●  | ●   | ●  | ●  | ●  | ●   | ●   | ●   | ●   | ●   | ●   | 3          | 57    | Germany       |

# FUNNEL PLOTS

- The KRI thresholds move closer together as the volume increases (increased sample size → reduced variability)
- Can filter so we see all sites or a subset based on color of circles



## ENROLLMENT RATE

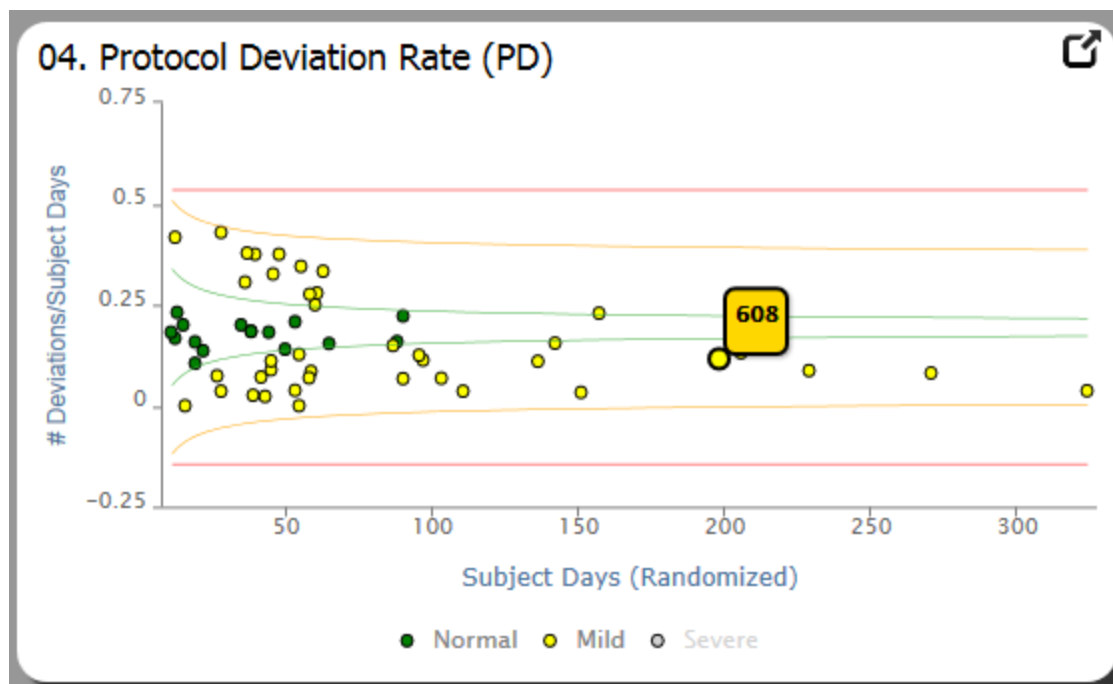
- Enrollment Rate: x-axis is number of months of enrollment for the site, y-axis is number of subjects randomized per month
- Site 608 is red for enrollment rate, indicating that the site is an outlier, with 1.27 randomized subjects/month
- Although Site 608 is an outlier, it is not necessarily a problem site
- What actions might be taken for Site 608?
  - Find out what the site is doing differently that might be implemented by other sites
  - Trigger a site visit to assess compliance with the protocol (e.g., inclusion/exclusion criteria) and data quality

## ENROLLMENT RATE

- Note that there are no red outliers at the bottom of the plot—the threshold is negative, and enrollment rate is always positive
- Many sites have not yet randomized subjects in up to 5 years, which accounts for the 0's at the bottom of the funnel plot
- Consider closing long-term non-enrolling sites due to inactivity

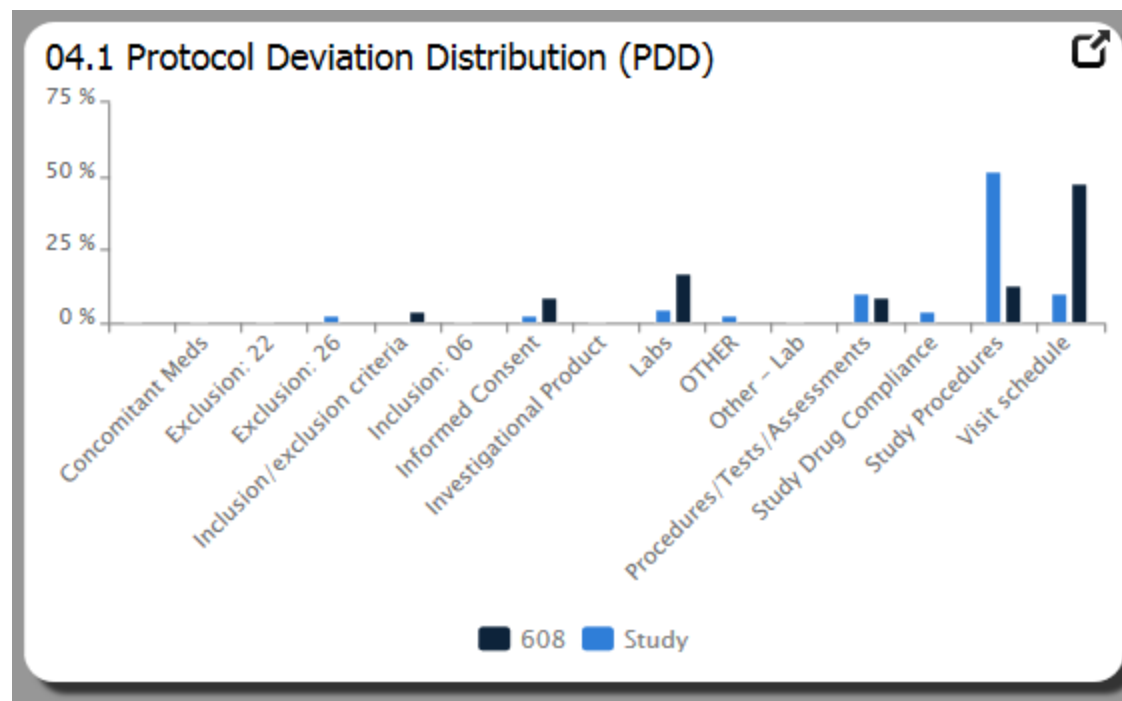
# PROTOCOL DEVIATION RATE

- Volume = total number of days in study for randomized subjects  
Rate = # deviations/subject day
- Site 608 has 198 subject days and 0.12 deviations/subject day, for a total of 23 deviations



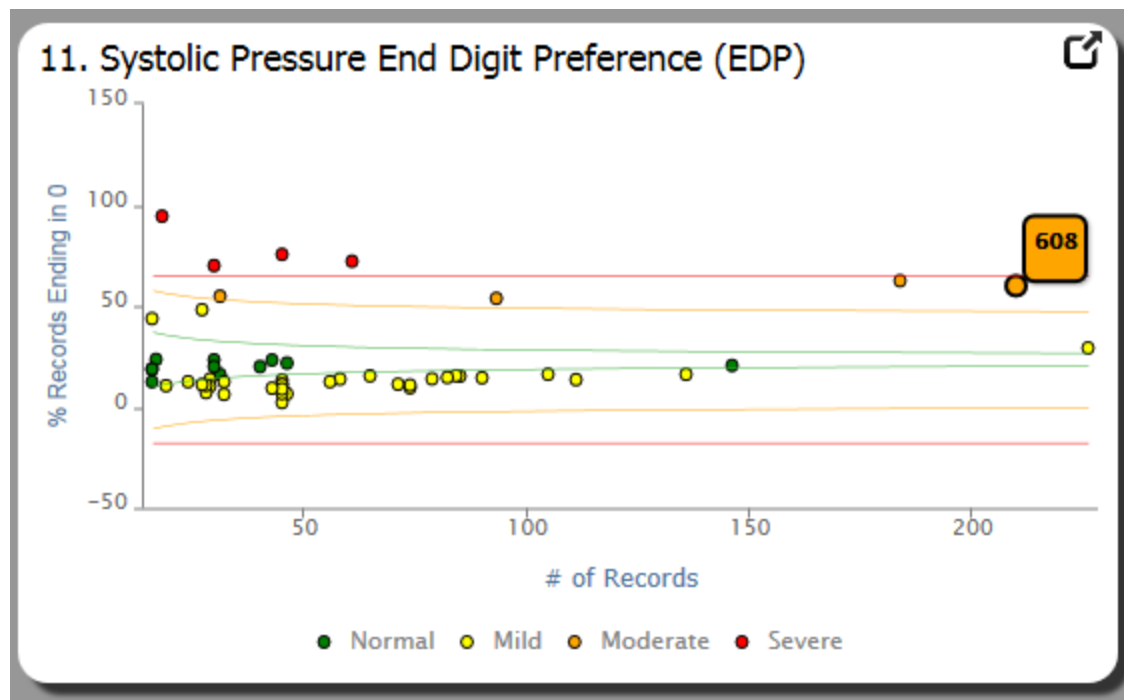
# PROTOCOL DEVIATION RATE

- The bar chart shows the distribution of protocol deviation categories for Site 608 compared to all sites combined
- The most common deviations for Site 608 are related to the visit schedule, while the most common deviations for the study as a whole are related to study procedures



# END DIGIT PREFERENCE

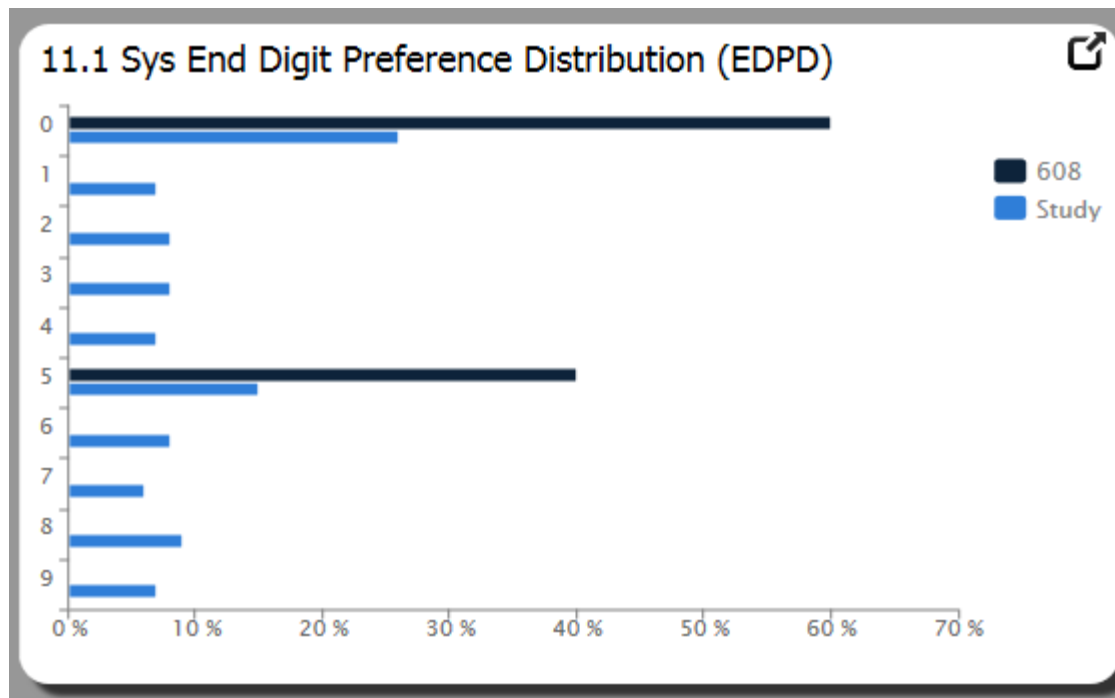
- Volume = Number of systolic blood pressure measurements
- Rate = % of blood pressure measurements ending in 0
- Site 608 is amber, with 60% of SBP values ending in 0





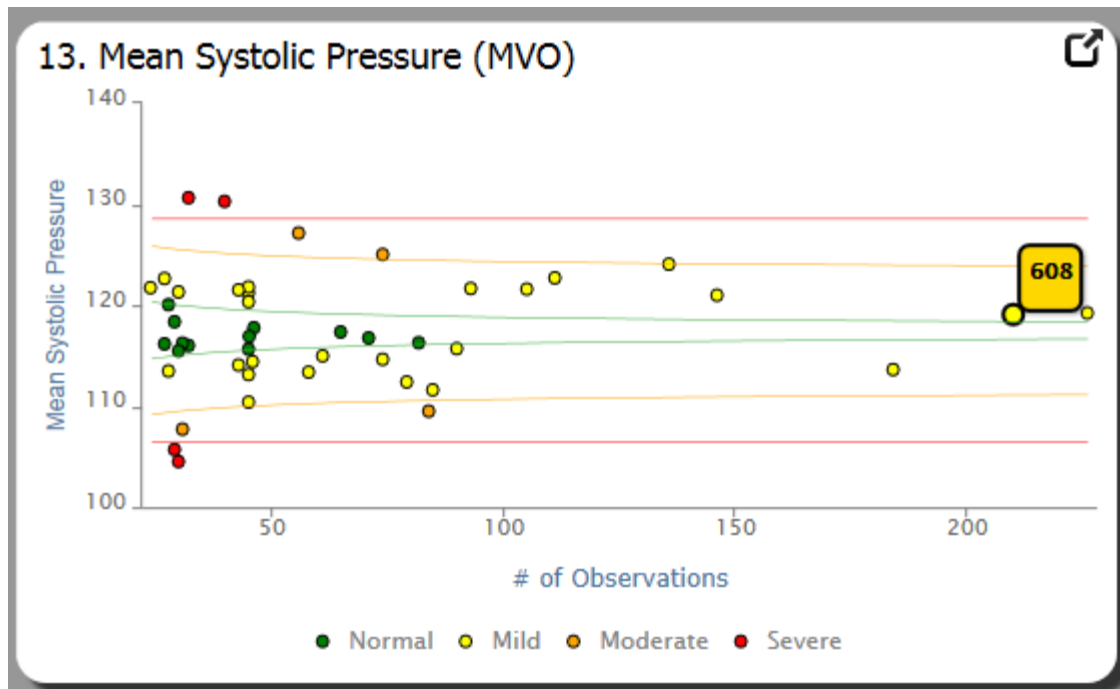
# END DIGIT PREFERENCE

- Overall, 26% of SBP values end in 0, and 15% end in 5
- For Site 608, 60% of SBP values end in 0 and 40% end in 5
- What might be going on at the site?
- What actions might be taken?



# MEAN SYSTOLIC BLOOD PRESSURE

- Volume = Number of SBP measurements
- Rate = Mean of all SBP values
- Outliers in both directions
- Site 608 has a value of 119.10, which is yellow
- The funnel plot narrows at the right so that the range for normal values is small



## SUMMARY

- The central data reviewer needs to have strong analytical skills.
- The central data reviewer identifies outlier sites for each KRI and creates observations in OPRA
- Each outlier is investigated to determine what action if any, will be taken and notes the action in OPRA
- Once an issue is resolved, the action is closed out
- An outlier may or may not signal a problem (red is always bad)
- The visual/analytic tool is just one of many components of a successful RBM program

# QUESTIONS/COMMENTS/THOUGHTS

