ICH E6 Findings from CTTI

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The presenter is an Employee of Duke University. Salary support comes from pooled membership fees of the Clinical Trials Transformation Initiative and from FDA Cooperative agreement. Is an independent director on the board of TRxAde, Inc

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CLINICAL TRIALS **TRANSFORMATION** INITIATIVE

Multi-stakeholder,
public-private partnership
co-founded by Duke University & FDA

Participation of 500+ more orgs and
± 80 member organizations

MISSION: To develop and drive adoption of practices that will increase the quality and efficiency of clinical trials

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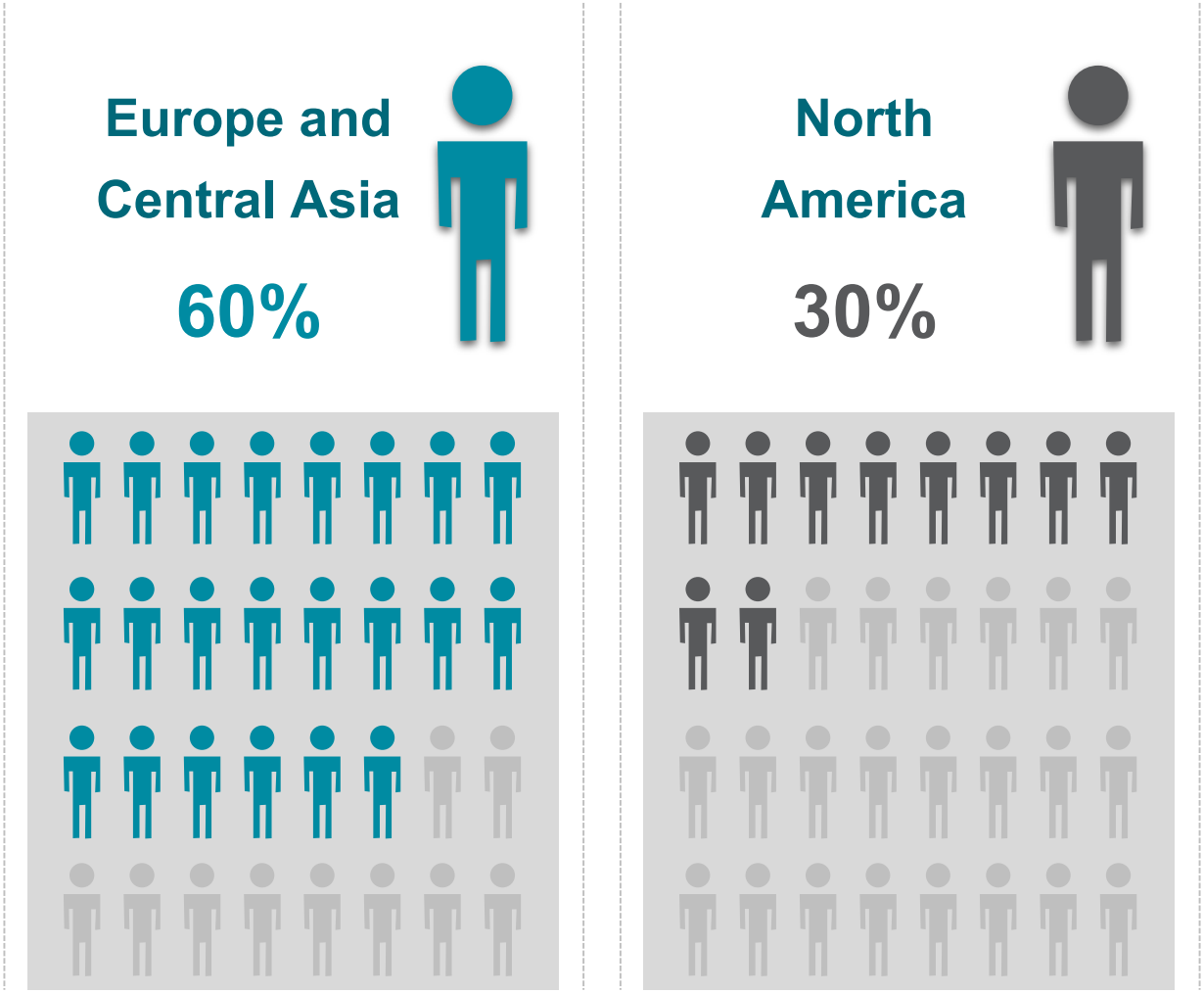
Evidence Gathering Activities

- Online survey to identify:
  - areas of ICH E6 that are & are not in need of updating
  - a diverse group of stakeholders for in-depth interviews
  - https://www.ctti-clinicaltrials.org/sites/www.ctti-clinicaltrials.org/files/survey_final.pdf
- Qualitative, in-depth telephone interviews
  - What is hoped the update will achieve
  - Most and least helpful aspects/sections and why
  - How the guidance could be improved
  - https://www.ctti-clinicaltrials.org/sites/www.ctti-clinicaltrials.org/files/idi-report_final_17mar2020.pdf
- Open-comment platform
  - https://www.ctti-clinicaltrials.org/sites/www.ctti-clinicaltrials.org/files/open-comment_final.pdf

Survey

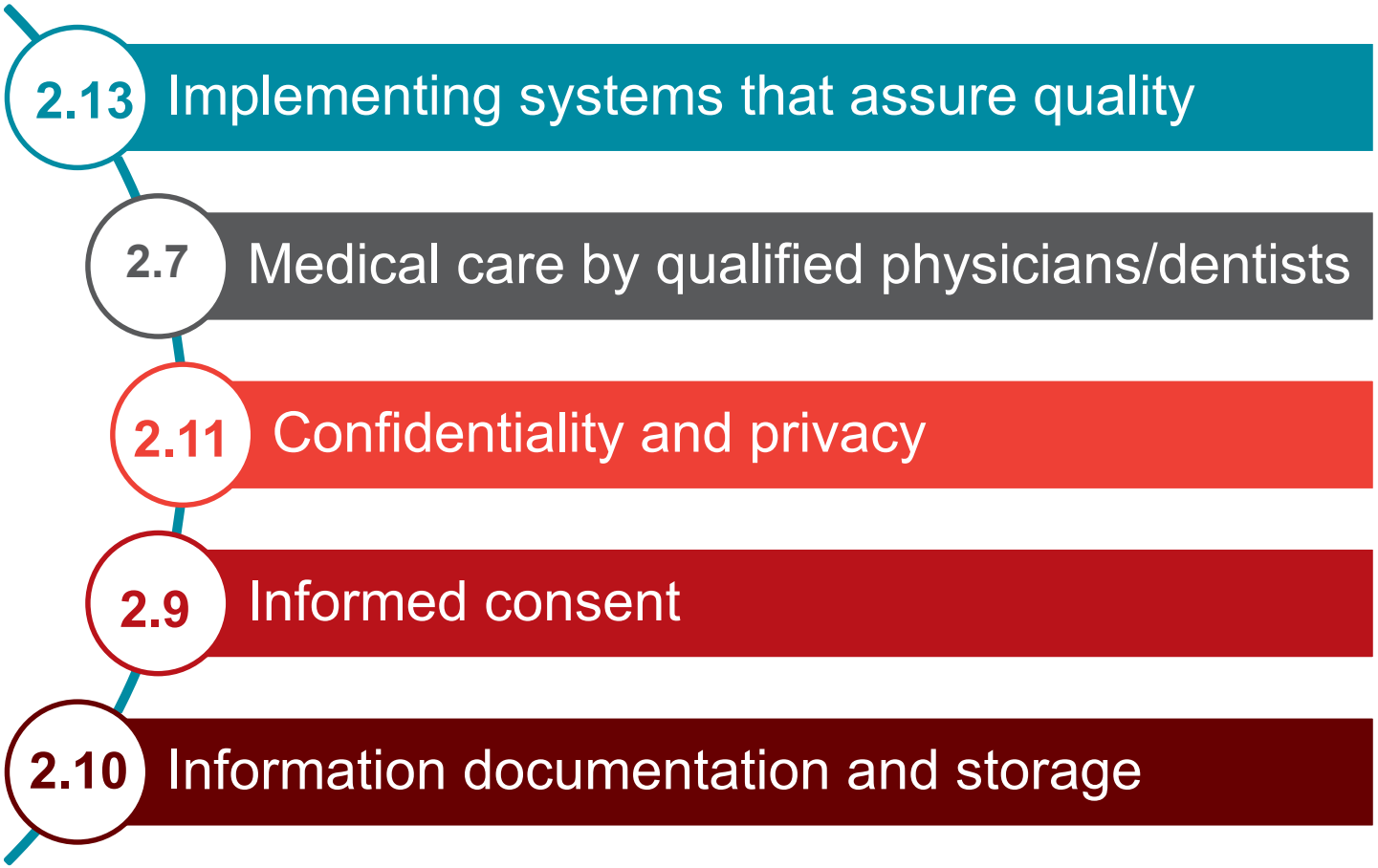
Participants (n=327) reside in 39 countries



Participants conduct research in 153 countries

- 70% conduct research in Europe & Central Asia
- 52% in North America
- 30% in East Asia and Pacific
- 18% in Latin American and Caribbean
- 15% in sub-Saharan Africa
- 14% in South Asia
- 13% in Middle East and North Africa

Top ICH E6 GCP principles needing updating (25%—29%)



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Sections and Topic updates

- Needing the ***most*** updating:
  - Section 4: Investigator
  - Section 5: Sponsor
- Needing the ***least*** updating:
  - Section 7: Investigator Brochure

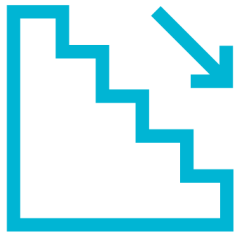
Topic most frequently mentioned as needing updating:

5.18 Monitoring (45%)

Qualitative Interviews

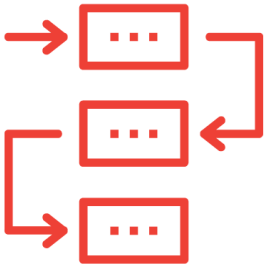
Aspirations

Need Flexibility



Simplify

Make updates



Be transparent and inclusive

Need Flexibility

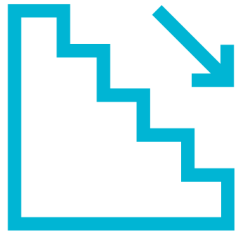
- Being specific about the types of research for which ICH E6 GCP is a requirement
- Clarifying when ICH E6 GCP is optional
- Providing a framework for adapting the guidance to other types of research
- Because ICH E6 GCP is viewed a global guideline, research in lower and middle-income countries need flexibility (e.g., informed consent, vulnerable populations, orphaned children)

Need Flexibility

The introduction of GCP states that the principles of GCP can be, as appropriate, applied to different types of research. So this precise introductory phrase has guided, at least in Europe, authorities and ethical committees applying ICH GCP to all different types of research, which not even involving drugs, at all.

—Regulatory, non-profit, Belgium

Simplify

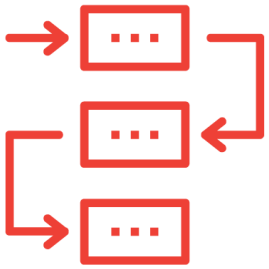


- **Recommendation:** Make ICH E6 GCP more user-friendly
  - Simplify GCP refresher training requirements
  - Eliminate duplicative trainings currently required by sponsors
- **Concerns:**
  - Complexity of the guidelines → disincentive for new investigators, for small single-site trials, and for investigator-initiated studies
  - Need to transition from perception of a “checklist” and policing tool for audits → spirit of GCP, guiding principles for research

Make Updates

- Accommodate changes in research conduct and technology
  - Multisite and multimodality trials
  - Informed consent (e.g., delayed consent, waiver of consent, opt-out consent)
  - Advances in technology (e.g., paperless trials and remote data collection)
  - New and enhanced study roles and responsibilities (e.g., monitor, sponsor liaison, study coordinator), including patients as stakeholders
- Clarify terms and concepts (e.g., risk-based approach, quality tolerance limits)

Be Transparent and Inclusive



- Include a wide variety of stakeholders (e.g., patients, others) in the revision process → more operationally feasible guidance
- Be transparent in the creation of the renovation
  - Process followed
  - Rationale behind decisions
  - Stakeholders who are involved and how selected
  - Process for soliciting feedback
  - How feedback was reviewed

Be Transparent and Inclusive

Who is writing [the renovation]?…
Who is it sitting around the table?
How they have been selected?…
There is a big need for transparency about the constituents, their role, the representation.

-Academic Center, Study Coordinator, Belgium

Helpful Overall

- Globally agreed-upon guidance
  - Provides research framework for countries with limited research guidelines, or where variation in regulations exists between countries
  - Provides process for establishing a clear evidence base → ensures that trial data can support marketing applications

Open-Comment Platform

Open Comment Opportunity

- Purpose – Allow respondents to suggest line-by-line edits to the current guideline version
- Participants – 36 respondents from North America (n=7), Europe (n=26), and Asia (n=3) who self-reported that they conduct research for which the findings will be used for regulatory purposes.
- No data analysis was conducted; responses are reported verbatim in the report

THANK YOU.

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https://www.ctti-clinicaltrials.org/projects/informing-ich-e6-renovation

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