EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

EMA multistakeholder workshop on Qualification of Novel Methodologies (QoNM) – initial feedback from the discussions

R&D Stakeholder Platform, 11 July 2023 (updated)

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Workshop agenda

Session 1: From innovation to qualified tools – the scope of qualification of novel methodologies

Chairs: Marjon Pasmooij (CBG-MEB) and Falk Ehmann (EMA)

Session 2: Patient-, Observer- and Clinician-reported outcomes (PROs, ObsROs, ClinROs) – key elements of patient centred medicines development

Chairs: Elmer Schabel (BfArM) and Andreas Kirisits (AGES)

Session 3: Methods based on Modelling and Simulation, Digital Health Technologies and Artificial Intelligence/Machine Learning (AI/ML)

Chair: Joerg Zinserling (BfArM) and Thorsten Vetter (EMA)

Session 4: Real World Evidence – Qualification of data sources

Chairs: Peter Mol (CBG-MEB) and Juan Jose Abellan Andres (EMA)

Session 5: Using "Qualification" going forward – ways to optimise the platform

Chairs: Paolo Foggi (AIFA), Pierre Demolis (AFSSaPS/ANSM) and Iordanis Gravanis (EMA)

Preliminary considerations for futureproofing of the QoNM platform as mentioned during the workshop

- Draft workshop report is currently being discussed internally
- Today : summary of preliminary considerations for futureproofing as they emerged during the workshop discussions, for initial orientation
- Ongoing EMA/EMRN review and discussions whether and how to translate preliminary considerations from the workshop into recommendations, prioritise and propose a road map for implementation

Preliminary considerations for futureproofing (to be analysed further)

a) Future scope and expertise needs

- Clarify that **EMA Qualification is no substitute for medical device (MD) or in-vitro diagnostic (IVD) certification** but provides confirmation that measures in a specific context of use can be applied in evidence generation to support benefit/risk assessment of medicinal products.
- Include clear considerations on the **device/software agnostic character of Qualification Opinions** in future procedural guidance
- **Need to include MD/IVD/software performance characteristics** in the published Qualification Opinion enabling developers intending to apply a qualified measure to confirm whether their device/technology meets minimal performance characteristics (bridging)
- **Explore options for multistakeholder QoNM procedures** (including e.g. HTA bodies, Notified Bodies, patient representatives, learned societies experts)
- Consider involving **more external experts** as members of the Qualification Team **or expert witnesses** (e.g. in cooperation with MWP/ESECs)

Preliminary considerations for futureproofing (to be analysed further)

b) Regulatory guidance and development support

- **Single EMA access point** for informal preparatory discussions
- Offer early QoNM **scoping meetings** (no fee)
- Publish **general guidance** clarifying **scope** and **value** of QoNM and the importance of **Context of Use** considerations and the **needs statement** when considering evidence requirements for Qualification; this may be **complemented by Q&A/lessons-learned live documents**
- **(Mandatory) publication of high-level information from Qualification Advice** to facilitate collaboration and avoid duplication of efforts
- **Foster pre-competitive collaboration** between industry, academia/learned societies and patient organisations (Membership of regulatory experts in public-private partnership scientific advisory groups if projects promise to address unmet measurement need? Interoperable use of IT platforms facilitating collaboration and regulatory interaction?)

Preliminary considerations for futureproofing (to be analysed further)

b) Regulatory guidance and development support cont'

- **Consider enhanced support for methods addressing unmet measurement needs** and/or having received a Letter of Support (in analogy to PRIME)
- Consider **enhanced support or a specific process for SME's and non-commercial method developers** (e.g. patient organisations, academics, HCPs, hospitals), including potential fee incentives.
- **EMA/EMRN may publish specific unmet need statements for novel methodologies** helping to de-risk projects for small developers (RFP – request for proposals); suitable projects may be considered for enhanced QoNM support
- **Better advertise available EMA support mechanisms** (SME office, PCWP, academia support, ITF)
- **Consider convening workshops** as a useful way to progress thinking and deeper understanding in emerging or complex technologies
- **Consider offering training modules** to improve the understanding of regulatory qualification in collaborating with public-private partnerships (e.g. IHI, C-Path)

Preliminary considerations for futureproofing (to be analysed further)

c) Procedural timelines and flexibility

- **Emphasise importance of early engagement** (scoping meeting, ITF, Qualification Advice) and **ability to approach EMA Scientific Advice Office contact points for informal discussion**;
- future procedural guidance to **emphasise the interplay/continuum between ITF and QoNM**
- **Ability to adapt the procedure** in line with the complexity/assessment needs of the specific request
- Ensure QoNM procedures – **while flexible – remain predictable**, in particular for PPP projects with limited funding horizon
- Consider '**staggered' Qualification review for methods targeting a 'high unmet measurement need'** allowing review of incoming data at defined milestones to confirm whether the evidence is still in line with the targeted Context of Use; clear criteria for inclusion in such a scheme would be required; a Letter of Support could serve as one of the entry points;

Preliminary considerations for futureproofing (to be analysed further)

d) Patient involvement in the QoNM procedure

- **Ensure patient involvement** in QoNM and **consider offering training** for patient representatives to prepare them for the process and complex questions discussed (e.g. in collaboration with EURORDIS patient training/PCWP).
- **Guidance to clearly recommend participation of patients in method development** as early as possible
- Consider **experienced patient representatives as mentors** for new candidates
- **Patient contribution** could be made transparent in published Qualification Opinions
- Ensure that **input from patient organisations is proactively sought during public consultation**

Preliminary considerations for futureproofing (to be analysed further)

e) Qualification outcome format and communication

- **(Mandatory) Publication of high-level Qualification Advice** information valuable to the scientific community, could foster collaboration and avoid duplication of efforts
- **Updating the briefing document template and the templates for Qualification Advice Letter and Qualification Opinion** with standardisation with a structured common format
- **Improve presentation of regulatory guidance, Qualification Opinions and Letters of Support on the EMA website** to increase accessibility and visibility
- **Monitoring and reporting of use in regulatory decision making** of qualified tools (or those having received Letters of Support)
- **Workshops and Q&As** could facilitate understanding of Qualification Opinions
- **Closer involvement of learned societies and Health Care Professionals** to increase awareness of the QoNM platform and qualified tools; could lead to increased reflection in clinical guidelines and scientific publications
- **Regular scientific publications on Qualifications – also in collaboration with consortia** – to explain how methodologies are qualified and how qualified tools are being used
- **For life cycle management**, current **static information presentation may be reconsidered and made dynamic** to enable appropriate reflection of how tools evolve

Preliminary considerations for futureproofing (to be analysed further)

f) Impact, uptake and lifecycle management of qualification opinions

- **Monitoring and reporting of uptake and impact of qualified measures**
- **Need for re-validation of methods** for which conditions and/or technologies change over time (e.g. data sources, registries, DHT, AI related methods)?
- **Regular dialogue between QO holders and EMA following Qualification**: e.g. to discuss challenges during the application of the methodology or (intended) changes to the measure from the side of the QO holder, and to provide information on the impact and uptake of the qualified method from the side of the regulator
- **Consider establishing a structured approach to extend Context of Use** of qualified methods, optimising time and resource needs
- Consider **establishing definitions for the degree of change of methods using rapidly evolving technologies**; if changes significantly impact on risks, functionality or performance specifications, re-evaluation of the QO and updated information is needed; if impact is considered minor, changes may be managed as per Quality Management System (QMS)

Preliminary considerations for futureproofing (to be analysed further)

g) Qualification of data sources – RWE

- **single access point for informal information** on QoNM for data source/registry holders
- **Data quality frameworks** (e.g. EMA data quality framework) as important reference points
- **Develop checklists** which facilitate description of data quality by data source holders to ensure data sources/registries can be fit for regulatory purpose
- **Offer post-qualification interactions involving all stakeholders (registry holder, MAH, EMA)** as part of a life cycle management
- **Explore the need to regularly confirm validity of data sources/registries**
- Support projects exploring **whether AI/LLMs may offer valid access to unstructured datasets**

Preliminary considerations for futureproofing (to be analysed further)

h) PROs and M&S

- **Establish direct interaction/communication between professional societies developing PRO(M)s and regulators**; as professional organisations are often unfamiliar with available regulatory procedures, provide presentations at professional society meetings on how to streamline regulatory qualification and encourage thereby potentially also qualification of instruments which have already been developed but have not been considered for regulatory qualification
- **Tripartite interaction between 'professional community' (e.g. learned societies, PRO developers, HCPs), pharmaceutical industry and EMA should be improved** and is important for qualification of PROM's
- **Encourage Qualification of M&S tools**, in particular if there will be a h**igh impact on regulatory decision making**, if platforms are intended to be used in many development programmes and for complex models built on retrospective data;
- Should a **M&S credibility framework** be adopted?

Next steps

- Ongoing EMA/EMRN review and discussions whether and how to translate preliminary considerations from the workshop into recommendations, prioritise and propose a road map for implementation
- Draft report will be shared and discussed with Sounding Board before publication
- Road map to be presented at the next R&D stakeholder platform meeting