C-Path Collaborative Efforts to Address Specific ePRO Data Collection Challenges

Linda Deal, Shire

FIFTH ANNUAL
PATIENT-REPORTED OUTCOME (PRO) CONSORTIUM WORKSHOP

April 29 - 30, 2014 ■ Silver Spring, MD

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Objectives of This Session



- To share the collaborative writing efforts of
 - PRO Consortium's ePRO Subcommittee
 - ePRO Consortium
- To present collaboration team's best practices and recommendations for
 - allowing subjects to opt-out of responding to a question
 - i.e. providing patients the option to not respond to a question rather than enforcing completion
 - challenges to source data collection and documentation
- To discuss concrete examples from the perspective of
 - Sponsors i.e. Pharma and Biotech companies
 - Technology providers
 - Regulators
- To share dissemination status beyond this workshop today

Session Participants



Moderator

 Linda Deal, MS – Head of Patient-Reported Outcomes, Gastrointestinal Business Unit Lead, Shire

Presenters and Panelists:

- Paul O'Donohoe, BSc Director of Health Outcomes, CRF Health
- Sarah Fleming, MPH Manager, Patient Reported Outcomes, Janssen Global Services

Panelists:

- Alexandra Barsdorf, PhD Associate Director, PRO Center, Outcomes & Evidence, Global Health and Value, Pfizer, Inc.
- Ari Gnanasakthy, MSc, MBA Co-Director, PRO Consortium and Head,
 Patient Reported Outcomes, Novartis Pharmaceuticals Corporation
- Jonathan Helfgott, MS Associate Director for Risk Science (Acting), Office of Scientific Investigations, CDER, FDA
- Cindy Howry, MS Vice President, eCOA/ePRO Product Management, Y-Prime

Opt-out

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Outline



- Goal of group
- Background
- Issues to consider
- Recommendations
- Key questions

Goal



- The goal of this group was to:
 - Identify the possible risks of requiring subjects to complete all ePRO items
 - Identify the various different approaches that could be taken to requiring subjects to complete ePRO items
 - Offer considerations and recommendations around opt-out for study teams implementing ePRO
 - Document to be made available on C-PATH website in coming weeks



Complete and accurate data – cornerstone of any trial

Paper has recognized issues with missing or inaccurate data

- Electronic solutions are increasingly popular data capture tools
- This has provided study teams a powerful way to collect high-quality patient-reported outcome data



These new tools have also brought new possibilities

 Key strength of ePRO is the ability to prevent subjects from progressing to the next item in an instrument until they have provided a response to the current item

 Seems to offer the chance of complete PRO data at the close of the study



- HOWEVER, what if a subject is confronted with:
 - Inapplicable questions they cannot answer
 - Questions about work for those who are unemployed
 - Sensitive questions they are unwilling to answer
 - Questions about sexual health

Risks inaccurate or unreliable data

Worst case scenario - subject may refuse to continue



 Unlike paper, there is no way to know if a subject has provided an answer just to move on with the questionnaire

 Suddenly our lovely complete dataset is looking a bit too good to be true...

3 possible approaches



- 1. Requiring subjects to complete all items in all the instruments in the study;
- Requiring subjects to complete all items used as key endpoints in the study, and allowing the subject to opt-out of responding to some, or all, other items (including sensitive items);
- 3. Allowing subjects to opt-out of responding to all items in the study.

Issues to consider



- Each of the three options have their own pros and cons
- Careful consideration should be given to the quality of questionnaires being used in a study
- Items or questionnaires supporting primary or secondary endpoints should be identified
- Items that may potentially be "unanswerable" (e.g. questions about work for subjects who are unemployed) or "sensitive" (e.g. questions relating to sexual health) should be identified

Recommendations



- Weighing up the importance of data in relation to its support of endpoints, versus the potential difficulty for subjects to answers questions, will help identify the most appropriate approach
- Regardless of the approach taken, if some form of opt-out is allowed the electronic system should be programmed such that subjects actively have to confirm their intent to skip an item
- The approach taken will help in the development of an appropriate statistical plan

Vendor Perspective



 Are there challenges implementing the 3 different approaches on an electronic platform?

Sponsor Perspective



 What are some limitations encountered with questionnaires that can impact compliance or missing data?

 What is the possible impact on a clinical trial of enforcing compliance?

 What is the perceived trade-off between complete but potentially inaccurate data, and incomplete data?

Regulator Perspective



 What is the position on requiring subjects to respond to all questions, versus the potential of having missing data which the subject has explicitly chosen not to provide?

 What is the position about the ethical implications of requiring subjects to respond to all questions, or is that purely an issue for IRBs?

ePRO Data Collection Challenges and Prevention Strategies Sarah Fleming, MPH Janssen Global Services

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Overview



- Background
- Issues that may come up that risk compromising source data collection
- Recommendations for how to handle these issues
- Considerations for using or allowing paper backups



 Electronic data capture is becoming the preferred method of data collection for all source data (FDA, 2013)

New challenges with increased use of ePRO

- Topics include:
 - Study site and subject challenges that may lead to deviations from the ePRO data collection plan
 - Provides recommendations to prevent potential problems or corrective actions

Identified challenges to ePRO source data collection





Site Acceptance of and Compliance with ePRO Data Collection



- Clinical study protocol language
 - Eligibility criteria specify ePRO use
 - Data monitoring expectations

- Site staff and monitor training
 - Basic ePRO use
 - Data monitoring online
 - How to train subjects to use devices successfully
 - Procedures for troubleshooting

Scheduling subjects at study site



Understand time requirements for ePRO completion

 Subjects should be aware of time commitment necessary to complete questionnaires

 Number of devices needed for site based on expected recruitment

ePRO device challenges



Sites should be trained to:

 Check to make sure that devices are charged and functional <u>prior</u> to subject arrival

Backup devices

Reschedule subjects if a backup device is not available

Call ePRO vendor helpdesk

Subject Acceptance of and Compliancewith ePRO



Informed Consent Form – ePRO language

Device alerts/reminders to the patient

- Site and monitor training
 - Provide reports or email alerts to the sites and/or monitors to be alerted of
 - subject non-compliance, and/or
 - data transmission issues

Subject Comfort and Familiarity with ePRO Modalities



Emphasize the importance of subject training

- Subject training in person at site
- Quick reference guide given to all patients

Key Takeaways



 Site monitor and subject training are crucial to the success of ePRO within a clinical study

 Preparation and preventive strategies will increase the likelihood of successful data collection

Deviations (planned or unplanned)



- After implementing all best practice recommendations, deviations may happen
 - ePRO device failure due to either site issues or device issues resulting in
 - Missing data
 - Unauthorized versions of paper sources
 - Mixed modality

How should these be handled?

Panel Discussion Paper use in ePRO study



- Sponsor perspective
 - Experience where sites planned to collect paper PROs in an ePRO study
- Vendor perspective
 - Paper collected, responsibility to enter data into the database?
- Regulatory perspective
 - In these situations, what is appropriate from a regulatory perspective when handling these data points? Mixed modality data handling? Paper source entered electronically on the backend for long term data collection?



Discussion and/or Questions?

Session Participants



Moderator

 Sue Vallow, RPh, MBA, MA – Senior Director, Patient Reported Outcomes, GlaxoSmithKline

Presenters

- Kathryn Engstrom Data Scientist Auto Immune, Eli Lilly and Company
- Jonathan Helfgott, MS Associate Director for Risk Science (Acting), Office of Scientific Investigations, CDER, FDA
- Sue Vallow

Panelists

- Valdo Arnera, MD General Manager, PHT Corporation
- Linda Deal, MS Head of Patient-Reported Outcomes, Gastrointestinal Business Unit Lead, Shire
- Jason Eger Vice-President, Project Management, ERT
- Sarah Fleming, MPH Manager, Patient Reported Outcomes, Janssen Global Services