Category: Training, Quality Assurance, Remote Monitoring, and Auditing – Completed Project

Demonstrating Safety and Necessity of Clinical Trials Deviations for Improving Flexibility and Inclusivity of Clinical Trials Enrollment Utilizing a Centralized Deviation Database

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1. Background

The COVID-19 pandemic forced an urgent need to allow for more flexibility so that patients could continue to be enrolled and treated on clinical trials. This offered a unique opportunity to study the effect of changes in study procedures on patient safety. In March 2020, the FDA released guidance on the conduct of clinical trials during the COVID-19 public health emergency. Sponsors and sites revised policies to implement newly permissible processes in order to continue to conduct clinical research safely such as telehealth, electronic consent documentation, shipping oral investigational product to patients, and remote monitoring. With this came a need to closely track protocol deviation data, especially deviations that were a direct result of these newly implemented processes.

2. Goals

This study was approved by the UT Southwestern institutional review board (IRB #STU-2020-0365). We established a protocol deviation database to monitor quality of clinical trials by tracking trends in protocol deviations and identification of patterns in order to prevent serious noncompliance. By developing the database to capture specific datapoints related to patient safety, including individual study assessments such as labs, ECGs, and imaging, related adverse events, and relationship to COVID-19 study modifications, it also allows us to demonstrate the impact of protocol deviations on patient safety.

3. Solutions and Methods

A working group was formed to evaluate existing deviation tracking and develop a centralized process. Existing Excel trackers and study databases were reviewed to create a REDCap database survey form to capture deviation data and allow for regulatory documentation in the study files. User testing was conducted for additional feedback to finalize the survey and all cancer center study teams were trained on the final database and process. The database survey included information on type, timing, and severity of deviations, COVID-related decisions, and detailed description of event and corrective and preventative action.

4. Outcomes

From September 1, 2020 through February 28, 2021, 341 deviations were recorded in the database for 77 oncology clinical trials and 82 unique patients across 8 cancer subtypes. Of these, 114 (33 percent) were designated COVID-related. None resulted in an adverse event.

5. Lessons Learned

This database demonstrates the utility of a centralized database for protocol deviations at clinical trials sites to track safety metrics, facilitate data-driven insights to improve quality assurance, and enable

regulatory documentation. Findings also support the overall safety of allowing protocol deviations for patients being treated on clinical trials. Continued research is needed into the safety and importance of clinical trials continuing to improve flexibility and inclusivity and determine the level to which increased flexibility will not impact safety while improving overall inclusiveness of clinical trials.

References: Gerber DE, Sheffield TY, Beg MS, Williams EL, Clark VL, Xie Y, Holbein MEB, Skinner CS, Lee SJC. Experience, Perceptions, and Recommendations Concerning COVID-19-Related Clinical Research Adjustments. J Natl Compr Canc Netw. 2020 Oct 7:1-8. doi: 10.6004/jnccn.2020.7643. Epub ahead of print. PMID: 33027755.