LESSONS LEARNED FROM COVID-19 STUDIES

- Pedro Barroso Inacio, Principal Regulatory Affairs Specialist, PPD
- Tijana Pajic, Senior Regulatory Affairs Manager, PPD
- Srna Jovic, Principal Regulatory Affairs Specialist, PPD

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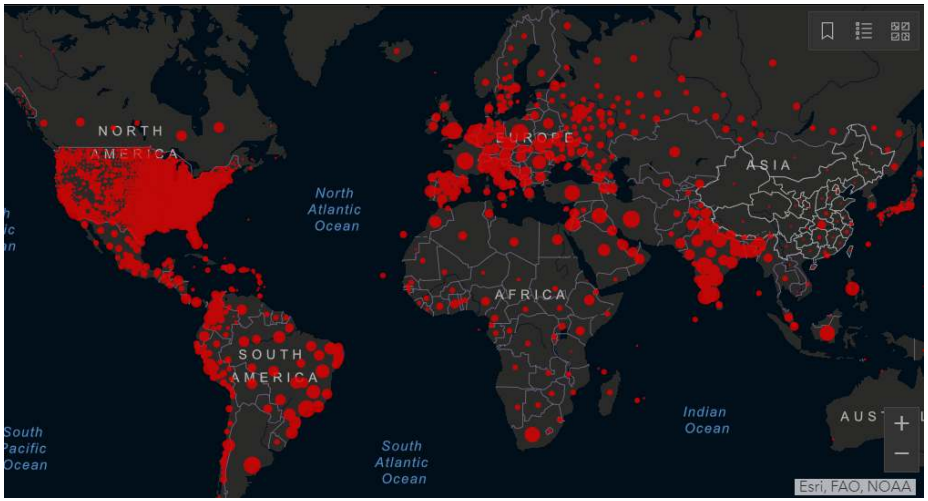
Agenda

- Background
- CTA Submissions of COVID-19 Clinical Trials - Key Success Factors
- Other Success Factors
- Regulatory Review
- Fast-Track Review and Approval
- COVID-19 Clinical Trials Review Timelines
- Rolling CTA Submissions
- Lessons Learned

Background

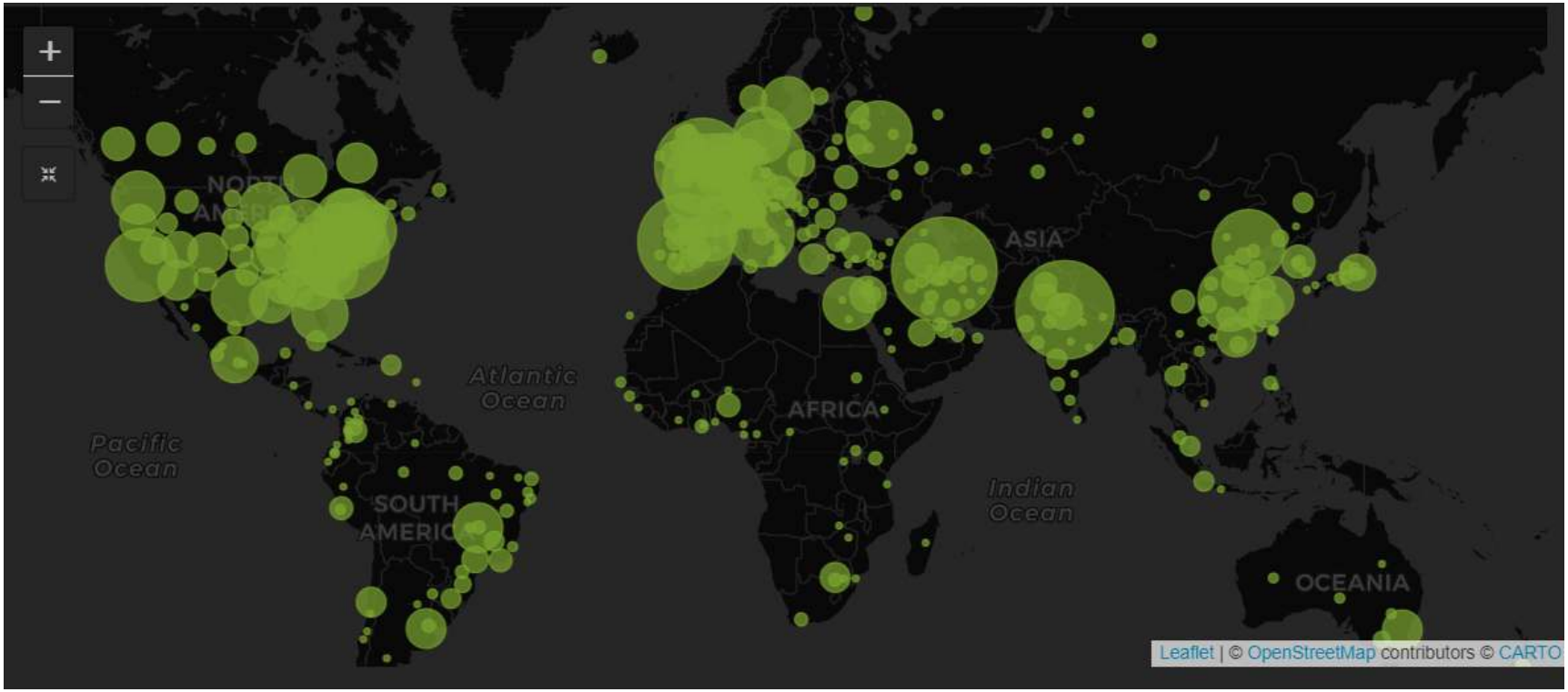
- The current COVID-19 pandemic is caused by a coronavirus named SARS-CoV-2
- First human cases of COVID-19 were first reported from Wuhan, China, in December 2019
- As of early December 2020, over 65 million cases have been registered and over 1,5 million deaths occured worldwide
- According to clinicaltrials.gov as of 04Dec2020 there are 4,094 studies worldwide



Johns Hopkins University Coronavirus Resource Center, COVID-19 Map - Johns Hopkins Coronavirus Resource Center (jhu.edu), accessed 04Dec2020

WHO, WHO-2019-nCoV-FAQ-Virus_origin-2020.1-eng.pdf, accessed 04Dec2020

Worldwide COVID-19 Clinical Trials Intensity



https://www.covid19-trials.com (covid19-trials.com), accessed 04Dec2020
A real-time dashboard of clinical trials for COVID-19 (thelancet.com), accessed 04Dec2020

Regulatory Implications of COVID-19

- Global Impact but Regulatory Requirements being Addressed Locally
- Many Agencies are operating in a restricted capacity
- Agency Guidance varies across countries / jurisdictions
- Changing Regulatory Perceptions with Daily Geographical Expansion
- Opportunities for Interim Measures supporting Trial Continuity

COVID-19 Regulatory Intelligence collection - Global Coverage

Agency Considerations

- RA & EC covered
- Restrictions e.g. closures, suspensions, Reduced hours remote working
- Contact details
- Guidance documents

New Studies

- Agency restrictions re new studies / new study initiations
- Risk Assessment requirements

Ongoing Studies

Interim measures to support continuity, e.g.

- Use of Telemedicine
- Study visit restrictions
- Direct to patient supply
- Home health visits
- Transfer to other sites

COVID-19 Studies

- Agency measures to support COVID-19 trials
- Key Agency Contact Details
- Submission Processes

CTA Submissions of COVID-19 Clinical Trials

Key Success Factors

- Fast-changing regulatory environment; essential to have access to quality, accurate and up-to-date intelligence
- Streamlined cross-functional teams to collate complete CTA in the shortest timeframe:
  - Feasibility, Start-up, Medical Writing, Regulatory, Clinical Supplies, Laboratories, etc.
- Early and effective engagement and close communication with regulators needed

Other Success Factors

- IMP specifics and phase of development
- Interest in 'specific products' against COVID-19, targeted patient population (e.g. France)
- Drug re-purposing

Regulatory Review

- APAC/EU Competent Authorities (CAs) have quickly adapted to the pandemic since March 2020 and have showed flexibility in CTA review timelines for COVID-19 clinical trials
- As pandemic continues, APAC/EU CAs' fast-track reviews seen during March and April 2020 is being affected by different reasons

○ 48 hours to 1 week review prolonged to several weeks, while rolling submissions partially accepted

○ Other regions implemented fast-track reviews

○ Different mechanisms for Ethics Committees (ECs) expedited reviews

Fast-Track Review and Approval

- Country requirements confirmed as not uniformed for fast-track, rolling submissions or else
- No waivers allowed on standard requirements
- Justifications for absence of items not possible to implement due to speed of the study conduct
- IMP labeling in English, if justified
- Conditional approvals granted not holding the study start
- Protocol amendments substantial or non-substantial

COVID-19 Clinical Trials Review Timelines

Region	Standard CTA Review Timelines	Expedited COVID-19 CTA Review Timelines
EU Member States	60 days	**72 hours - 5 working days**
Eastern Europe (non-EU)	2.5 months	**2-3 weeks**
Latin America	4 months	**10-15 working days**
Asia-Pacific	2 months	**48 hours – 5 working days**

Region	Standard Substantial Amendment Review Timelines	Expedited COVID-19 Substantial Amendment Review Timelines
EU Member States	35 days	**3 days**
Eastern Europe (non-EU)	1.5-2 months	**10 days**
Latin America	3-4 months	**2-3 weeks**
Asia-Pacific	1-2 months	**48 hours – 5 working days**

Rolling CTA Submissions

- Rolling CTA submissions have been accepted by both CAs and ECs (but not in all countries)
  - CAs: early engagement, review of draft Protocol, CMC information and IB (France, Spain, UK)
  - ECs: pre-review of Protocol, IB, submission in batches (France, Netherlands)
- Advantages and disadvantages
- Submission of study sites
- Close communication with regulators is crucial

Lessons Learned

- New ways of working
- Fast-track reviews
  - various ways of implementation
  - dependent on epidemiological picture
- Regulators open for discussion: early engagement is key
- In general, no waivers will be granted
- Fast-paced trials: importance of strong, focused, united teams

Thank you!
Obrigado!