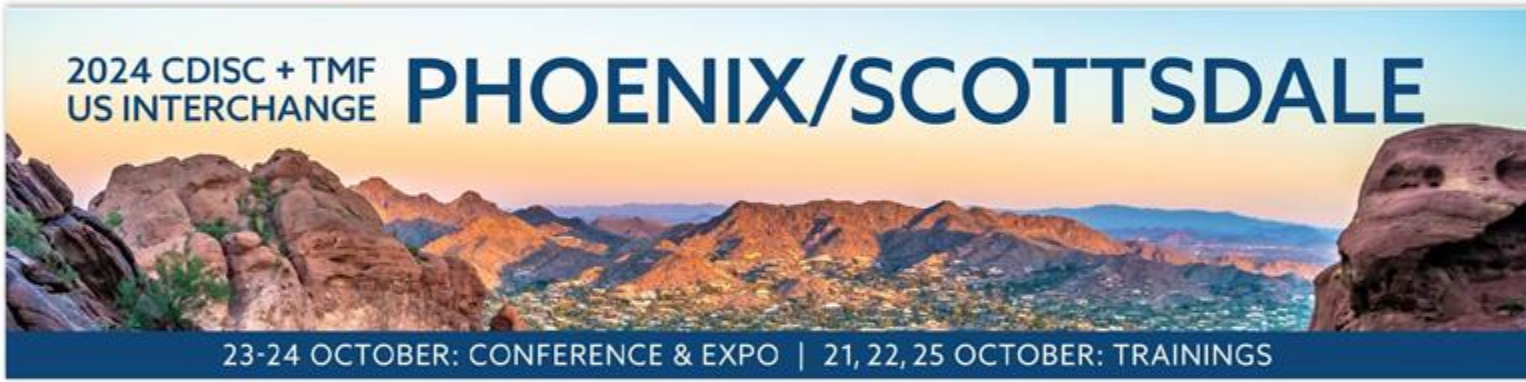

Considerations for Risk Based Approaches for TMF

Presented by Ramya Iyer, Regeneron Pharmaceuticals and
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Meet the Speakers

Ramya Iyer

Title: Sr. Manager, TMF

Organization: Regeneron Pharmaceuticals

Over 10 years of industry experience, currently serving as a Sr. TMF Manager at Regeneron Pharmaceuticals, where I lead Document Governance, Quality, and Inspection Readiness processes.

Marion Mays

Title: CEO/Principal Consultant

Organization: Jerion Consulting Group

Over 30 years of experience supporting organizations through GCP regulatory inspections with FDA, MHRA, EMA, and PMDA. My experience working for sponsors, CROs, software vendors as well as directly helping sponsors manage inspections uniquely positions me to offer valuable insights into managing risk and the process of implementing Risk-Based programs.

Disclaimer and Disclosures

The views and opinions expressed in this presentation are those of the author(s) and do not necessarily reflect the official policy or position of CDISC.

The author(s) have no real or apparent conflicts of interest to report.

Agenda

1. Introduction
2. Risk Based Foundation
3. Risk Based Approach Considerations
4. People – Process – Technology: Putting it together

Considerations for Risk Based TMF Management

Introduction

- This presentation explores the essential considerations for developing a risk-based model for Trial Master File (TMF) management, focusing on three critical pillars:
  - People
  - Process
  - Technology
- We will explore some considerations to establishing a risk-based model
- What can impact your risk-based approach to TMF management
- Where you can get some help in developing your approach

Risk Based Foundation

Why we are moving to this approach

Regulatory Landscape

- Navigating the new view to Risk Based Approaches
- Electronic systems, data, documents and integrity
- Interventional and non-traditional trial formats
- Underlying principles of GCP
- Risk and quality-based considerations for the protection of patient safety and data integrity
- Decentralized and pragmatic clinical trial elements
- Changes to regulations are becoming more frequent

Industry Changes

- What is driving the need for risk-based approaches
  - New trial designs
  - Technological advancements
  - Breadth and depth of data capture and sources
  - New types of testing facilities and approaches
  - Outsourced service providers and more complex clinical supply chains
  - Global reach and regulatory changes

Risk Based Approach Considerations

What to consider

Evaluating Risk

- Considerations when evaluating where might have risk
- Type of Trial - Phase of trial
- Complexity of trial
- Global Trial - inconsistencies and different requirements across different regions or countries
- Vendor - inconsistencies in TMF management and knowledge

Justifying your approach

- Rule #1: Can you clearly explain your approach and how it is implemented
  - Outline the How
  - Describe the Risk considered
  - Establish thresholds for Risk
- Rule #2: Justify your approach
  - Outline the What
  - Describe your process for establishing approach
  - Establish the parameters you considered
  - Explain how you keep risk low with your approach

Justifying your approach

- Rule #3: Explain when it is used
  - Outline the when and where risk-based activities are applied
- Rule #4: Communicate why
  - Training is key to ensuring compliance, explaining why it is important

Implementing A Risk Based Program

- Expect challenges and roadblocks
- Gaining acceptance through communication and social acceptance
- Use Regulatory Compliance as your starting point
  - Be sure to stay updated on evolving regulations affecting TMF management (R3 is coming)
- Establish your Quality Control Measures
  - Key performance indicators
- Have good vendor oversight
  - Establish clear expectations for CROs and other vendors regarding TMF content quality
- Revisit your approach and considerations, continuous improvement should be part of your program
  - Stay informed about industry best practices and technological advancements in TMF Management
- Try to align your TMF management approach with the risk-based monitoring strategies

Let’s Break it down!

People - Process - Technology

People

- Effective risk management relies on the expertise and collaboration of team members.
- Clear communication are vital to ensure everyone understands their roles.

Length of study – team transitions – how do you keep the story of the study intact!

Changing vendors mid-study

Clear Roles and Responsibility

Who is responsible for TMF?

Is TMF part of the core function?

Did I miss someone???
I probably did!!

It always take a village and TMF is the ‘city’ center!!!

Process

- Establishing robust processes for systematic risk assessment and continuous monitoring is crucial.
- Adaptive strategies are needed to manage emerging risks effectively - Not a one and done approach.
- Consider overlaps from People and Technology considerations.
- Resource allocation/limitations.
- Risk considerations for Resource intensive processes – QC and Completeness Check.
- Quality First Mindset!

Risk based Considerations for Completeness

- Do you need to define expectations for ALL artifacts for all milestones?
- Multi-faceted approach is key
- Is the process tight enough to account final documentation?
- Logical reasoning possible in accounting for #expected
- Frequency and extent of continuous monitoring by cross-functional study teams
- Time and Resource considerations

Risk Based Considerations for Quality

What does history tell you?

Numbers speak volumes!

Are there positive trends that you can leverage?

Are there processes in place with least risk of non-compliance?

Level of confidence on associated processes

Identifying low risk areas

QbD approach leading to good quality documents

Review and Approval process as part of document finalization

Relax level of QC here!

Layered approach for QC

Not all documents require same level of QC

What's most important for periodic QC vs initial QC

What other processes (e.g., EDL) can you leverage for QC

Think about the criticality of the record and where it's coming from

End of Study QC

Do you need to do a full QC at Study close?

Some things to think about - pivotal study, study compliance issues

Performance during Periodic QC

Technology

Advanced tools and data analytics are indispensable for prioritizing critical records and automating routine tasks, enhancing efficiency and compliance.

Resources

CDISC Initiative...

CDISC Risk Initiative

Simplify your implementation activities

CDISC is working to help you do just that…….

Whitepaper

Tool Kit

Training

Risk Initiative

- Whitepaper to establish best practice and provide context to establishing a Risk-Based Approach.
- A Toolkit to help you evaluate your risk and support your approach to a sold Risk Based process.
- Training that can support the activities to create and implement a Risk-Based approach to managing TMF Records.

Now that we have given you some food for thought!

Let’s Summarize…

Summary and Key Take-away

- Not a one size fits all
- It is important to establish baseline considerations
- Review your data - it has the best information
- Understand your organizations risk strategy
- Be able to justify your risk-based approach
- Remember the four rules!

Thank You!