GATEKEEPERS FOR PRAGMATIC CLINICAL TRIALS

DANIELLE WHICHER, JENNIFER MILLER, KELLY DUNHAM, STEVEN JOFFE

Danielle Whicher PhD, MHS
Program Officer, Clinical Effectiveness Research
Patient Centered Outcomes Research Institute

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OBJECTIVES

(1) Describe the range of gatekeepers relevant to PCTs in the United States

(2) Offer criteria for gatekeepers to consider when making decisions about resources

(3) Provide recommendations regarding best practices for gatekeeping in the context of PCTs
Gatekeepers: people or entities who have the ability to allow or deny access to the resources required to support the conduct of clinical research.
Q1: WHAT ARE THE VARIOUS RESOURCES REQUIRED TO IMPLEMENT PCTS?

Implement a PCT in the US

- Participants or their surrogates
- Financial support for research
- Reimbursement for care
- Access to interventions
- Data
- Physical, informational, and human infrastructure
Q2: WHO CONTROLS ACCESS TO EACH OF THOSE RESOURCES IN THE US?

<table>
<thead>
<tr>
<th>Table 1. Gatekeepers in pragmatic clinical trials and the resources they directly control.</th>
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<tr>
<td>Financial support for research</td>
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Q3: WHAT CRITERIA SHOULD GATEKEEPERS USE FOR MAKING DECISIONS ABOUT ACCESS TO RESOURCES FOR PCTS?

- Concern for the interests of individuals, groups, and communities affected by the gatekeepers’ decisions, including protection from harm and maximization of benefits

- Advancement of organizational mission and values

- Stewardship of financial, human, and other organizational resources
Q3: CONTINUED: REGULATORY REQUIREMENTS

- Gatekeepers must adhere to regulatory requirements
  - Federal human subjects protections regulations,
  - US Food and Drug Administration (FDA) requirements, and
  - Legally enforceable fiduciary obligations
    - EG: organizational officials with responsibilities to shareholders and clinicians with responsibilities to patients
CONFLICT AND TRANSPARENCY

- Ethical criteria may conflict with each other and with relevant federal, state, and local regulations

- Transparent and established processes can build trust between gatekeepers and those they represent
DISCUSSION AND APPLICATION
APPLICATION: FUNDERS AND SPONSORS

- May control:
  - financial support for research,
  - reimbursement for care, and
  - interventions

- In many situations, all three ethical criteria apply.
  - When stakeholder’s interests conflict, some funders/sponsors will be guided by their organizational mission
  - Industry sponsors must sometimes reconcile their legal accountability to shareholders with their mission and value statements

- Established merit review processes can promote transparent decision-making
Control access to many resources indirectly by establishing the rules that other gatekeepers must apply in carrying out their responsibilities.

Actions are generally guided by regulations.

Actions may be guided by the first two ethical criteria when developing or revising regulations as well as in situations where the regulations do not provide adequate guidance.

Promote transparency when rationales are provided for decisions.
APPLICATION: PAYERS

- May control:
  - financial support for research,
  - reimbursement for care, and
  - data

- Payers must balance the potential for knowledge gained from PCTs with other research or organizational priorities

- In many situations, all three ethical criteria apply although many decisions will likely be driven by the mission-driven goal of being able to make evidence-based coverage decisions

- Decisional criteria and transparency can promote legitimate decision making
APPLICATION: HEALTH SYSTEM AND OTHER ORGANIZATIONAL LEADERSHIP

- May control:
  - financial support for research,
  - reimbursement for care,
  - access to physical, informational, and human infrastructure
  - access to data and
  - access to patients/participants

- When making decisions about financial resources and organizational infrastructure, all three ethical criteria generally apply
  - Criteria will often conflict with each other and sometimes with regulatory requirements

- When making decisions about data and access to patients/participants, the primary consideration should be concern for the interests of individuals, groups, and communities affected

- Little information exists regarding decision-making processes
APPLICATION: RESEARCH TEAM LEADERSHIP

- May control:
  - access to physical, informational, and human infrastructure
  - access to data and
  - access to patients/participants

- When making decisions about organizational infrastructure, all three ethical criteria will often apply
  - Criteria will often conflict and must be balanced

- When making decisions about data and access to patients/participants, the primary consideration is concern for the interests of individuals, groups, and communities affected
APPLICATION: HUMAN RESEARCH PROTECTION PROGRAMS

- May indirectly control:
  - interventions
  - access to physical, informational, and human infrastructure
  - access to data and
  - access to patients/participants

- Primarily guided by regulations and by concern for the interests of individuals, groups, and communities affected

- Enhance the legitimacy of their decision making by including representation from different stakeholder groups and maintaining records justifying their decisions
APPLICATION: PATIENT ADVOCACY AND COMMUNITY GROUPS

- May control:
  - access to physical, informational, and human infrastructure
  - access to data
  - access to patients/participants and
  - Increasingly, financial support for research

- When making decisions about access, actions should be guided by the first two ethical criteria

- Function as all other funders/sponsors when making decisions about financial support
APPLICATION: CLINICIANS

- May control:
  - Access to data
  - Access to eligible patients
- Choices are primarily guided by concern for the interests of individuals, groups, and communities affected
- Clinicians may sometimes feel conflicted about discussing PCTs with eligible patients due to time constraints and concerns that research responsibilities could conflict with clinical responsibilities
- Another challenge occurs when patients are eligible for multiple trials
DISCUSSION/CONCLUSIONS

- Gatekeepers can enhance the legitimacy of their decision-making by:
  - developing transparent decision-making processes,
  - offering justifications for decision, and
  - engaging with those they represent

- Investigators should consider engaging with gatekeepers when designing PCTs to understand their decision-making processes
WHERE DO WE GO FROM HERE?

- Specific case examples of decisions faced by gatekeepers and how the criteria apply
  - How do different gatekeepers weight the different criteria?
  - What do gatekeepers do when ethical criteria conflict with each other and with other legal obligations?

- Shifts in gatekeepers and gatekeeper responsibilities once research has been implemented
THANK YOU.