Penn University of Pennsylvania | Human Research Protections Program

Emergency Risk Mitigation Planning Guidance: Ensuring Participant Safety in Research

The purpose of this document is to provide investigators with general guidance for developing protocol-specific plans to modify research during an emergency/disaster situation *impacting the investigator's ability to ensure the ongoing safety of participants*. Challenges to study conduct may arise from events such as, but not limited to:

- Extreme weather
- Natural disasters
- Equipment/technology malfunctions
- Man-made disasters
- Infectious disease outbreaks

These events may lead to challenges in conducting protocol-specified procedures, including but not limited to: administering drugs and devices, adhering to protocol-mandated visits and procedures, communicating with participants, and managing study records and /or specimens. This guidance contains various considerations for protocol-specific emergency/disaster risk mitigation planning.

General Exclusions

If any of the following are true, development of a protocol-specific risk mitigation plan for research may not be needed:

- Research can be conducted as written while adhering to additional institution-level and HRPP-level guidance and requirements regarding the emergency/disaster event;
- Research is externally sponsored, and the sponsor has developed a protocol-specific risk mitigation plan for the research; OR
- Research has been voluntarily placed on hold for recruitment and all research procedures (except for necessary follow-up) are to be done consistently with additional institution-level and HRPP-level guidance and requirements regarding the emergency/disaster event.

Exclusions may vary depending on the type of emergency event. For example, if the research can be conducted and managed virtually, a plan may not be needed in cases where the research does not involve in-person interaction with participants.

General Considerations for Creating a Protocol-Specific Emergency Risk Mitigation Plan

The following are considerations for investigators when determining the various elements of their research that must be modified to ensure the ongoing safety of research participants during an emergency/disaster situation.

The considerations do not represent a complete list and are intended to serve as a foundation to guide investigators, study staff, sponsors and the IRB in efforts to address

the new risks to research participants and others posed by possible emergencies/ disasters.

Modifications to Recruitment and Enrollment Processes
Consider any that are appropriate for the research:

- Temporarily hold study recruitment procedures.
- Temporarily hold enrollment of new research participants.
- Incorporate additional or revised screening procedures for research participants or study personnel that will be completed prior to recruitment and enrollment (e.g., for infectious disease outbreaks).
- Consider alternate locations for enrollment and screening (e.g., at local clinics or conduct remotely)

Additional Modifications to Minimize Risk to Participants
Consider any that are appropriate for the research:

- Withdraw some or all current research participants from the research.
- Alternate locations for study visits. For example:
  - In the case of technology failures, modify study visits to take place in person rather than virtually.
  - In situations where participants cannot take place in person, modify study visit procedures so that visits can be completed via phone, virtually, or at participants' local lab, clinical or imaging center.
- Incorporate additional screening procedures for research participants or study personnel that will be completed prior to in-person visits (e.g., for infectious disease outbreaks).
- Incorporate other additional safety monitoring procedures.
- Alternate locations for monitoring. For example,
  - If planned on-site monitoring visits are no longer possible, consider optimizing use of central and remote monitoring programs to maintain oversight of clinical sites.
  - If remote monitoring is not possible due to technology failures, plan for on-site monitoring visits.
- Modify timing and scope of specific study visits to account for essential versus nonessential study procedures.
- Consult with your local ISC provider to assess technology
  - Assess sufficiency and accessibility of technology currently available
  - Evaluate new technology solutions
  - Ensure adequate and documented training on current and new technology
- Develop a contingency plan around the storage of files and specimens when the loss or temporary unavailability may impact participant safety.

FDA-Regulated Research
Consider any that are appropriate for the research:

- For any investigational products that can be self-administered, modify the protocol to allow for alternative secure delivery methods (e.g., investigational product can be shipped to the participant's residence).

    - Consider whether additional instructions may need to be provided to participants.
    - Consider if drug or device product accountability (including destruction or return) should be modified by providing way for the product to be returned or destroyed remotely if it does not put patients at any increased risk.
- For any investigational products that are normally administered in a healthcare setting, consult FDA review divisions on plans for alternative administration (e.g., home nursing or alternative sites by trained but non-study personnel).

Research Record and Study Documentation

The following are additional considerations for investigators when maintaining research records and /or specimens that reflect study modifications made to ensure the continuation of research and ongoing safety of research participants in emergency/disaster situations.

For protocol wide study restrictions or modifications necessitated by the emergency/ disaster situation, documentation related to any of the following elements are included in the research record where applicable and appropriate to the research:

- Changes in study conduct
- Duration of those changes
- Which trial participants were impacted
- How those trial participants were impacted
- Other relevant actions that were taken.

<u>FDA-Regulated Research</u>

Where there are individual instances when efficacy endpoints are not collected, the research record includes documentation related to the reasons for failing to obtain the efficacy assessment (e.g., identifying the specific limitation imposed by the emergency/disaster leading to the inability to perform the protocol-specified assessment).

Specific information in case report forms explains the basis of any missing data, including the relationship to the emergency/disaster for missing protocol-specified information.

Where changes in the protocol include any of the following, the research record includes documentation that changes were made in consultation with the applicable FDA review division where feasible and appropriate:

- Amendments to data and/or specimen management
- Amendments to statistical analysis plans
- Alternative administration of investigational products that are normally administered in a healthcare setting (e.g., home nursing or alternative sites by trained but non-study personnel)
- Protocol modifications for the collection of efficacy endpoints, such as use of virtual assessments, delays in assessments and alternative collection of research-specific specimens

Communicating with Participants
As informed consent is an ongoing process, investigators should consider how changes due to emergency/disaster situations will be communicated to participants who are active or in follow up. A research participant communication plan describing the study-specific modifications being made to ensure the ongoing safety of research participants during the emergency/disaster situation may need to be developed for implementation with all current (and where applicable, prospective) research participants. This plan should include:

- What information will be communicated to current (and where applicable, prospective) research participants;
- Who will communicate the information;
- When the information will be communicated; and
- How the information will be communicated.

IRB Notification and Approval
One of the following pathways must be followed:

- If immediate modification of the research is necessary to eliminate an apparent immediate hazard to a participant, take action and notify the IRB via an exception request within five business days.

  OR

- For all other study modifications made to ensure the ongoing safety of research participants throughout an ongoing emergency/disaster situation, submit a study amendment to the IRB.

Decision Tree: Emergency Risk Mitigation Planning Guidance: Ensuring Participant Safety in Research