Sunshine on Europe: impact of recent EFPIA and EU guidelines on publication planners

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Disclaimer

As an independent consultant, the views expressed in this presentation are my own and do not necessarily reflect the views of the conference organisers.
Transparency
Agenda

Evolution of data transparency
- Scientific publications & congress abstracts & presentations
- Trial registration, Results posting
- Clinical study report & clinical summary public release
- Individual subject data release, Lay summaries

Response from pharmaceutical industry & industry organisations
- Public policies
- New guidelines – GPP3

Evolution of financial payments transparency
- Sunshine Act
- EfPIA Disclosure Code

New practices
- Publication & disclosure plan
- Impact on protocol, QC processes
Clinical study report
Only to regulatory agency

20th century Publication Outlets

Published paper

Congress abstract & poster
Publication outlets 2005-2013

- Published paper
- Congress abstract & poster
- Clinical study report
- Only to regulatory agency
- Trial registry results records

Publication outlets 2005-2013

- Published paper
- Congress abstract & poster
- Clinical study report
- Only to regulatory agency
- Trial registry results records
European Medicines Agency policy, June 2014
Mandatory posting of results

- **Interventional clinical trials ending after 21 July 2014**
  - Results must be posted on EudraCT within 12 mo (adult) or 6 mo ( paediatric) of study completion
  - Using defined data set

- **Interventional clinical trials ending before 21 July 2014**
  - Results must be posted retrospectively
  - Using defined data set and/or summary
    - Different timeframes dependent on type of trial & date of completion

- **ALL interventional trials**
  - whether drugs approved or not
European Medicines Agency policy, October 2014
Publication of clinical data

- Make publicly available with redaction of personal identifying and commercially confidential information (CCI):
  - Clinical overviews
  - Clinical summaries
  - Clinical study reports with
    - Protocols & amendments
    - Sample case report form
    - Documentation of statistical methods
    - Individual patient data (IPD)

- When decision taken on MAA submitted by centralised procedure (approval or withdrawal)
Principles for Responsible Clinical Trial Data Sharing
Our Commitment to Patients and Researchers

Biopharmaceutical companies are committed to enhancing public health through responsible sharing of clinical trial data in a manner that is consistent with the following Principles:

- Safeguarding the privacy of patients
- Respecting the integrity of national regulatory systems
- Maintaining incentives for investment in biomedical research

Companies routinely publish their clinical research, collaborate with academic researchers, and share clinical trial information on public websites at the time of patient recruitment, after new drug approval, and when investigational research programs have been discontinued.

Biopharmaceutical companies will apply these Principles for Responsible Clinical Trial Data Sharing as a common baseline on a voluntary basis, and we encourage all...
Current disclosure outlets

- Lay Summaries
- Clinical overview & summaries
- Clinical study report
- Protocol & amendments
- Individual patient data (IPD)
- CSR synopses
- Published paper
- Congress abstract & poster
- Trial registry results records CT.gov, EU CTR, others
Discrepancy between published articles and trial registry information
Comparison of the primary outcomes of RCTs registered with their subsequent publication indicated that selective outcome reporting is prevalent.

CONCLUSION:
Timing and Completeness of Trial Results Posted at ClinicalTrials.gov and Published in Journals

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Abstract

Background: The US Food and Drug Administration–approved drugs to treat HIV/AIDS are derived from clinical trials of Food and Drug Administration–approved drugs to treat HIV/AIDS. We assessed the timing of trial completion and rate of clinical trial results posted on ClinicalTrials.gov that were later published in journals.

Methods: We searched ClinicalTrials.gov on March 27, 2012, for randomized controlled trials of drugs with approved indications for HIV/AIDS. For 550 of these trials, we searched PubMed for corresponding publications. Data were obtained from ClinicalTrials.gov and from the published articles for trials with results both posted and published. We compared the time from first public posting or publishing of results and completeness of results published in ClinicalTrials.gov and journal articles. Completeness was defined as the reporting of all key endpoints. We surveyed experts for the flow of participants, efficacy results, adverse events, and serious adverse events.

Conclusions: Our results highlight the need to search ClinicalTrials.gov for both unpublished and published trials. Trial results, especially serious adverse events, are more completely reported at ClinicalTrials.gov than in the published articles.

PUBLICATION POLICIES
GSK Public policy positions

GSK Publicly Disclosed Clinical Research Information

All human subject research studies that evaluate investigational or approved medicinal products – (phase I-IV, meta-analyses, observational studies)

- Study Start
- Study Completion
- 8-12/18 months
- 18-24 months
- Time of publication

- Protocol summary posted
- Result summary posted
- Manuscript submitted
- Full protocol and clinical study report* posted on the GSK Clinical Study Register

* CSR posted after approval or termination of the medicine
Trial Data & Results

Pfizer believes that it is important for researchers, trial participants, regulators, and others acting in the best interest of patients to have access to clinical trial information to advance medical understanding and progress. It’s also important that this access works in ways that protect patient privacy, preserve regulatory authority and maintain incentives for those who generate data to conduct new research.

Pfizer publicly shares results from our clinical trials, whether the results are neutral, negative or positive. We also share data gathered in clinical trials we sponsor with trial volunteers, researchers, and others.

There are several ways in which we share trial results and data:

- We submit clinical trial results for publication in peer reviewed journals within 18 months of primary completion date.

Responsible Data Sharing

Pfizer’s practices adhere to the principles for responsible data sharing laid out by the European Federation of Pharmaceutical Industries and Associations (EFPIA) and the Pharmaceutical Research and Manufacturers of America (PhRMA).

- Pfizer Policy: Public Disclosure of Pfizer Clinical Study Data and Authorship
- Read the PhRMA/EFPIA principles (PDF)
- How Pfizer meets or exceeds the PhRMA/EFPIA commitments (PDF)
- A Guide to Requesting Pfizer Patient-Level Clinical Data (PDF)
- Frequently Asked Questions (PDF)
- Statistical Analysis Plan Sample (PDF)
Good Publication Practice for Communicating Company-Sponsored Medical Research: GPP3

Wendy P. Battisti, PhD; Elizabeth Wager, PhD; Lise Baltzer; Dan Bridges, PhD; Angela Cairns; Christopher I. Carswell, MSc; Leslie Citrome, MD, MPH; James A. Gurr, PhD; LaVerne A. Mooney, DrPH; B. Jane Moore, MS; Teresa Peña, PhD; Carol H. Sanes-Miller, MS; Keith Veitch, PhD; Karen L. Woolley, PhD; and Yvonne E. Yarker, PhD

- Sets out 10 Good Publication Practice principles for company-sponsored medical research
- Endorses sharing full study reports and appropriately anonymised individual subject data with qualified researchers on request
- Spells out research which should be published, including non-interventional studies
- Expands guidance on interpretation of ICMJE authorship criteria & addresses common authorship issues
- Clarifies appropriate author payments
- Expands on role of medical writers
A supportive and well-organised plan ensuring that the research and its results are communicated clearly to the scientific and healthcare communities as well as the general public is essential.
Publication & disclosure plan

From 2015

Provide redacted CSR, lay summaries, IPD

Post results on ct.gov, EU-CTR

12 mo  Paed 6 mo

Press release?

Primary manuscript

Secondary manuscript(s)

Appears EU-CTR

Register CT.gov

First Pat In

Last Pat Out

D/base Lock

Tab Fig List

Final Clin Study Report

Method/ population congress abstract

Poster/ talk

1st results Congress abstract

Poster/ talk

Poster/ talk

Burden of disease congress abstract

Method/ population congress abstract

Poster/ talk

Poster/ talk

Poster/ talk

Primary manuscript

Secondary manuscript(s)
FINANCIAL TRANSPARENCY
Physician Payments Sunshine Act - effective Apr 2013

Summary Data for 2014

Total US Dollar Value
$6.49 Billion

Total Records Published
11.41 Million

Total Companies Making Payments
1,444

Total Physicians with Payment Records
607,000

Total Teaching Hospitals with Payment Records
1,121

Show More Details
• Obliges member companies to disclose direct or indirect Transfers of Value to or for the benefit of an HCP
  • Donations or grants
  • Events costs
  • Service or consultancy fees
• To individual named recipient

• R&D costs reported on aggregate basis
• Annual reporting
• Report on company or government/association website
PLAN
PROTOCOL

Prepare protocol considering it WILL become public

Clear primary endpoint & timeframe

Restrict number of secondary endpoints

Prepare protocol with Company Confidential Information redacted
# PLAN

## PUBLICATION & DISCLOSURE PLAN

| Prepare plan **before** study recruitment |
| Plan key scientific content for each |
| - congress abstract/ poster/ oral & manuscript |
| - trial registries & results database submission |
| - press release |
| Data availability & timelines |
| Authors, contributors |
| Target journals (with contingency) & congresses |
| Review & Approval |
| - Heads of Publications, Disclosure Team, Med Affairs, Clin Dev, Reg Affairs, Data Mgmt & Stats, Compliance, Public Affairs, Chief Medical Officer  NOT Sales/ Marketing |
STANDARDISE QC PROCESSES

**Identify one results document as ‘core’**

- Final tables, figures & listings?
- ≤ 4mo after study completion (paediatric trials)
- ≤ 10 mo after study completion (adult trials)
- Same data in CSR, Results registries, Congress abstracts, posters &/or oral presentations, Primary manuscripts, Clinical overviews & clinical summaries

**Review vs ‘core’ document**

- Draft trial & results registrations
- Draft scientific manuscripts & congress materials

**Ensure study identifier(s) included in ALL publications**
STANDARDISE
PROCESSES

Record costs/ publication project

- Medical writing/ editing
- Journal open access
- Copyright permission
- Congress abstract submission, attendance expenses

Named individual reporting vs aggregate reporting

- part of clinical research?
Present to:

- Project team
- Key internal sponsors eg Clin Dev, Med Affairs, Stats & Data Mgmt
- External study investigators
- Co-development partner
Use Publication Management software

• Eg DataVision, PubsHub, PubStrat
• Controlled access to all Publication & Disclosure team members
• Include Disclosure tasks in project activities
• Choose Medical Communications vendor with user capability
### COMMUNICATE

#### PUBLICATION & DISCLOSURE PLANNING MEETINGS

**Regular**
- F2F/ TC/ videolink

**Members**
- Disclosure rep, publication manager, medical writer(s) of CSR & publications, Med Affairs, Clin Dev, Reg Affairs, Data Management & Stats, Compliance

**Review progress of Publication & Disclosure plan**
- timeframe, key content, issues & solutions

**For trials on products under joint development**
- Key staff from development partners
Change of mindset
Transparency
Consistency
THANK YOU