OCREB Memo - COVID-19 (Coronavirus)

OCREB acknowledges the impact that the COVID-19 pandemic has had on the clinical research environment, and the potential impact on the daily conduct and oversight of clinical trials. The safety of participants is of primary importance, and the potential harms of initiating or continuing a trial should be weighed against anticipated benefits in such a setting. Investigators should work with their institutions and study sponsors to consider whether the start of a new study should be delayed, or if an existing study should be modified in light of the impact of COVID-19 related constraints on the clinical services, and to assess the impact of any changes on participant safety and data integrity.

- **March 27, 2020 v2:** to change OCREB central email address
- **March 27, 2020 update:** additions and clarifications in response to questions (see highlighted areas)
- **March 23, 2020 update:** # 2 - clarification regarding the submission of amendments.
- **March 18, 2020 update**: # 5 - updates related to reporting suspensions in study enrolment. List of relevant materials added, including FDA Guidance and a WCG archived webinar.
- **March 17, 2020 initial memo**

OCREB Activities during the Pandemic

OCREB has policies and processes in place to continue with its reviews and ethics oversight during the current coronavirus (COVID-19) outbreak. All memos are accessible on OCREB's website.

- OCREB oversight activities are continuing remotely, as per SOP 501 - OCREB SOPs.
- The next OCREB meeting is April 3 (phone/web). Deadline was March 17.
- Please contact the relevant OCREB staff member directly by email or phone – access contact details at OCREB Contacts.
- OCREB will prioritize the review of amendments that are necessary as a result of COVID-19.
- We may schedule *ad hoc* OCREB sub-committee meetings as needed, as per SOP 501.

OCREB Reporting Expectations of the Investigator/Study Sites

Sponsors and clinical investigators are encouraged to engage with OCREB as early as possible when urgent or emergent changes to the protocol or informed consent are anticipated as a result of COVID-19. In this way, OCREB can evaluate the proposed changes and ensure that the context and the anticipated outcomes have been assessed appropriately. The implementation of alternative processes should be consistent with the protocol to the extent possible, and sponsors and clinical investigators should document the reason for any contingency measures implemented. E.g., impact on the informed consent process, study visits and procedures, data collection, study monitoring, adverse event reporting, and changes in investigator(s), site staff, and/or monitor(s). Policy and procedures should be compliant with applicable policies for the management and control of COVID-19. Efforts to ensure the safety and welfare of participants and to minimize impacts on trial integrity, and to document the reasons for protocol deviations, will be significant.

1. Changes in approved research may not be initiated without OCREB review and approval except where necessary to eliminate an apparent immediate risk to research participants.
   Changes to the study necessary to eliminate apparent immediate hazards/risks to participants may include:
   - Changing from in-person visits to virtual;

- Change or elimination in study visits/procedures that do not impact the integrity of the study or participant safety – e.g., change to dispensing of study medications; suspended sample collection; delayed submission of data to sponsor; revised consenting procedures; suspension of follow-up visits;
- Incorporation of screening questions to identify potential COVID-19 exposure. The incorporation of this screening procedure does not require OCREB approval given that they are being utilized across the hospitals/centres.

2. If a study sponsor needs to make a change to a study in order to eliminate apparent immediate risks to participants, these changes can be made and then reported to OCREB in a timely manner. The notification to OCREB may be a full protocol amendment by the Provincial Applicant through a Provincial Amendment (PAM). However, it also may be a memo, letter, or other document that explains the changes being made, as long as it provides sufficient information for OCREB to assess the relative risks resulting from the changes. Provincial Applicants should work with the study sponsor to develop plans appropriate to the study and participant population.
3. When changes necessary to eliminate apparent immediate hazards to participants are implemented prior to OCREB review, consent is not required unless the change fundamentally alters what the participants previously consented to, which requires documented ongoing (oral) consent. However, if required, participants also would be informed of any relevant changes through a consent form update, which would be submitted with the amendment. Notification of a temporary hold on study enrolment does not require immediate submission to OCREB (see #5).
   If a PI needs to make a centre-specific change to a study in order to eliminate apparent immediate risks to participants - e.g., in response to institutional directives, these changes can be made and then reported to OCREB in a timely manner, if required (see #5 and #6).
4. OCREB recognizes that in response to COVID-19 each institution will be determining their best course of action for ongoing and prospective trials, and thus changes may not be made at a study-wide level. OCREB expects that the urgent implementation of changes at the centre level will be well documented and consent will be maintained (through oral communication) with ongoing consent documented. Participants do not need to be informed of a suspension of enrolment.
5. A temporary suspension in study enrolment does not need to be reported to OCREB. It must be documented and noted in the next scheduled continuing review application to OCREB.
   - Note: although submission of a reportable event related to suspension of enrolment is not required, reportable events regarding enrolment suspension (provincial or centre) that are submitted to OCREB will undergo Administrative review and Acknowledgement by the responsible OCREB Research Ethics Coordinator, as per SOP 501 addendum.
   - Although not required, if preferred, applicants may email a list of all studies for which enrolment has been suspended, along with related sponsor or institutional communication to ocrebonline@oicr.on.ca.
6. OCREB recognizes that an increase in protocol deviations is likely during this period. While documentation is essential for all deviations, protocol deviations do not need to be reported to OCREB unless the deviation is related to a change in consenting procedures for new enrolment, or if the deviation imposes an increase in the risk of harm to participants or adversely affects the integrity of the data. For example, if a participant is not able to travel for an in-person visit because of self-quarantine, that deviation does not need to be reported unless it impacts the risk to the participant. If the deviation meets the reporting criteria, submit deviations as centre reportable events as soon as there is time and sufficient information.
7. The impact of any changes in the conduct of the study should be documented to enable appropriate evaluation and reporting and to ensure that ongoing consent is maintained.

Sponsor/Study Site Considerations for Initiation or Continuation of a Study

- The initiation of a study or the ongoing conduct of a study should be aligned with the institution's requirements during the pandemic.
- The impact of COVID-19 on recruitment and retention of participants should be carefully considered before initiating a new trial. The ability to confirm eligibility and to conduct key safety assessments and study evaluations within the specified time window is (are) of particular importance.
- The investigator and sponsor should assess each trial to determine if recruitment should be temporarily suspended, or participants discontinued. Such decisions should be proportionate and based on benefit-risk considerations and impact on the health and safety of the participant.
- Contingency arrangements must be made if an investigator is unable to carry on with the Centre PI role – e.g., coverage by a co-investigator; assignment to a new Centre PI. If the study will be assigned to another PI, submit a centre amendment to OCREB with the change in Centre PI.
- Alternative mechanisms - e.g., remote monitoring, must be put in place for ongoing sponsor monitoring of the study, as applicable.
- If a participant is unable to attend the site, other measures, such as home nursing, home delivery of study medications, or contact via phone may be required to identify adverse events and ensure ongoing medical and study oversight. However, the limitations of such methods should be taken into account. Changes to existing practice should be proportionate and based on benefit-risk principles.
- Participants must be kept informed of the new information, such as privacy considerations if communications are changed from in-person to phone and/or require the disclosure of PHI such as for home delivery of medications.

OCREB is committed to the safety of study participants, and to supporting oncology research teams as much as we can through these challenging times. Please do not hesitate to contact us with any questions. We will do our best to assist your team.

Sincerely,
The OCREB Team

Relevant Related Materials:

- March 23, 2020: Health Canada Notice to clinical trial sponsors published on their website.
- FDA Clinical Trial Guidance during COVID-19 Pandemic
- Archived Webinar Clinical Trials in the Era of COVID-19: The Changes You Need to Make Now