

Develop the regulatory framework for emerging clinical data generation

Underlying actions

EMA's Regulatory Science Strategy to 2025 – Human Stakeholder Workshop

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Develop methodology to incorporate clinical care data sources in regulatory decision-making



Modernise the GCP regulatory oversight to enable decentralised models of clinical trials coupled with direct digital data accrual



Develop the capability to assess complex datasets captured by technology such as wearables



Facilitate training and understanding of healthcare professionals and patients to access and participate effectively in such trials



Develop methodology to incorporate clinical care data sources in regulatory decision-making



- A clear framework for how digital measures can provide meaningful insight into medicine development is key. Digital devices can also generate extremely large data sets. Thus, important consideration must be given for the interpretation and analysis of this data.
- A critical reflection on **which data is relevant** in the context of drug development processes needs to be undertaken.
- Explore the use of real-world endpoints in regulatory decision making, including outlining the acceptability of real-world endpoints for specific contexts of use and description of a framework for validating these endpoints.



Develop methodology to incorporate clinical care data sources in regulatory decision-making



- It will be important to ensure that there is a co-ordinated and consistent
 approach to the handling of these types of data across the EU regulatory network.
- The exploration of novel methods of self-measurements by patients can be supportive, as long as they represent patient relevant outcomes.
- Begin with some disruptive products to set up the roadmaps. AI and digitalized
 medicine is the big trend in clinical decision making. The key is the quality of the
 large data analyses.
- It is important to also consider the potential **consequences for society**, if data from mobile and wearable technologies are accepted for drug registration.



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- Modernisation of GCP regulatory oversight must consider technological advancements. For instance, a truly virtual or decentralized trial would require use of technologies such digital signatures, which are currently inconsistently accepted by Member States.
- Define which quality standards have to be fulfilled to incorporate such data into regulatory decision-making.
- Progressing a platform to gain multi-stakeholder input on digital endpoints. The
 current processes may be lengthy which is not adapted to the agility sponsors need
 when determining a CT design.



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- Training sessions on digital technologies (i.e. artificial intelligence, Big Data, virtual clinical trial, sensor generated data) represent an important opportunity for the experts working in the European regulatory agencies.
- Involvement of different professionals (i.e. information engineers and data scientists) is required. It could be an opportunity for the EMA to establish a multidisciplinary working party dedicated to the application of digital technologies to drug development, authorization and post- marketing surveillance.
- Introduction of/piloting alternative mechanism to manage large submissions
 e.g. cloud submissions.



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Clarify questions on data ownership and data security



- To ensure data privacy we need validated, automated de-identification systems. And advanced consent.
- There is a need to clarify the responsibility of ownership and data security, as well as how to make it open for research.
- Further dialogue with regulators globally on how to utilise technology enabled objective assessment of cognition, behaviour and functioning in CNS trials, as well as stakeholder alignment regarding privacy/GDPR considerations when utilising DHTs such as those meant for passive monitoring.

Any questions?

Further information

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