Managing Research Compliance Utilizing an Electronic Compliance Database System

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Disclosure

- I have no financial relationships to disclose
- The electronic compliance manager tool I will be highlighting was developed by the Department of Pharmacy Services for Intermountain Healthcare, Inc., and is a copyright of Intermountain Healthcare, Inc.
 - Electronic database is currently active in use for pharmacy compliance
 - · Conceptually applicable to the research setting... medication research in proposal
 - Presentation is to highlight conceptually how an electronic compliance manager can be used in a research compliance environment.



Why is compliance so important to research?

- Protect and provide safety
 - Public / Patient Safety
 - Investigator Safety
 - Ex., drug study involving hazardous medication
 - Standing as a reputable investigator
 - Protect the data
 - · Integrity of the study
 - Increases the impact of the research outcome
- Regulatory
 - Controlled substances
 - Government and regulatory oversight (FDA, JC, HHS, etc.)
- Cost control

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Common Reasons for Research Non-Compliance

- Pre-study Related
 - Failure to conduct complete literature research, prior literature reports
 - Failure to have a detailed, written and vetted protocol
 - · sample size analysis
 - statistical assumptions to be made
 - · identify limitations of measurement methods
 - · identify adequate bias control measures
 - failure to determine and write a detailed time line
- IRB Approval
 - · Adherence to responsibilities as clinical investigator
 - No approval obtained, lapse in IRB, no continuing review
- Study Related
 - Informed Consent (improper/outdated consent)
 - Protocol Deviations / Violations (changes made with no approval)
 - Drug and Device Accountability (record keeping inadequate)
 - Inadequate Medical Records (trial data not recorded (e.g., adverse events)

Portier W, Dunne C. Current challenges and opportunities in clinical research compliance. Ochsner J. 2006 Spring; 6(1):21-24 Clark GT, Mulligan R. Fifteen common mistakes encountered in clinical research. J Prosth Res 55 (2011) 1-6.



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Compliance in Research: It's About Coordination

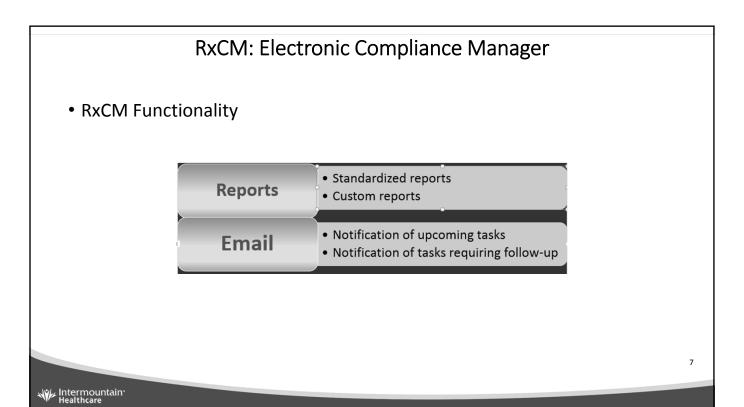
- Manual Oversight
 - Costly
 - Time consuming
 - · Accuracy lower
 - · data collection errors
 - competency of staff
 - · study integrity harder to control
 - Bulky
 - · paperwork and amount of filing
 - · ability to retrieve more difficult
- Electronic Oversight
 - Less costly
 - Increased efficiency
 - Real time
 - · Compliance assessment and controls improved

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RxCM: Electronic Compliance Manager

- Stores Documents associated with task completion and documents compliance.
 - Attachments can be added to each task for documentation, retrieval, verification
 - Demonstrate compliance with internal policies as well as State/Federal laws
- Dashboard function provides timeline alerts for task completion
 - · Organizes workflow daily/weekly/monthly for staff
- Provides both corporate/local levels a method for managing compliance
 - · Status assessment in real time
 - Ensures completion of required job functions for category compliance
- Provides validation tool for compliance audits/inspections.
 - Internal (Internal Process Control, Corporate Compliance, Internal Quality)
 - External (State DOPL, DEA, FDA, JC, etc.)





RxCM: Electronic Compliance Manager

- Maintains Task Lists by category to complete/perform in compliance with the required category
 - Corporate Assigned Tasks
 - Controls/organizes compliance for categories of focus system wide
 - Local Pharmacy Assigned Tasks (created by the pharmacy)
 - · Controls/organizes workflow for task completion by staff
- Organizes required categories of compliance in the workplace
 - Controlled Substances
 - Compounding USP 797/795
 - · Pharmacy Licensing
 - 340B
 - · Utah State DOPL Readiness
 - Medication Management (JC)
 - · Medication Research?
 - · In 2017, 640 medication research studies



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Medication Research

- Next Steps for Pharmacy Compliance → Medication Research Compliance
- Food and Drug Administration Good Clinical Practice Guidelines state:
 - 4.6 Investigational Product(s)
 - **4.6.1** Responsibility for investigational product(s) accountability at the trial site(s) rests with the investigator/institution.
 - 4.6.2 Where allowed/required, the investigator/institution may/should assign some or all of the investigator's/institution's duties for investigational product(s) accountability at the trial site(s) to an appropriate pharmacist or another appropriate individual who is under the supervision of the investigator/institution.
- The Joint Commission Medication Management Standard: MM.06.01.05

Rationale: The hospital safely manages investigational medications

- A 1. The hospital has a written process addressing the use of investigational medications that **includes review**, **approval**, **supervision**, **and monitoring**.
- A 2. The hospital's written process for the use of investigational medications specifies that the **pharmacy controls** the storage, dispensing, labeling, and distribution of investigational medications.

Good Clinical Practice: Consolidated Guideline. Federal Register, 1997, Vol. 62, No. 90

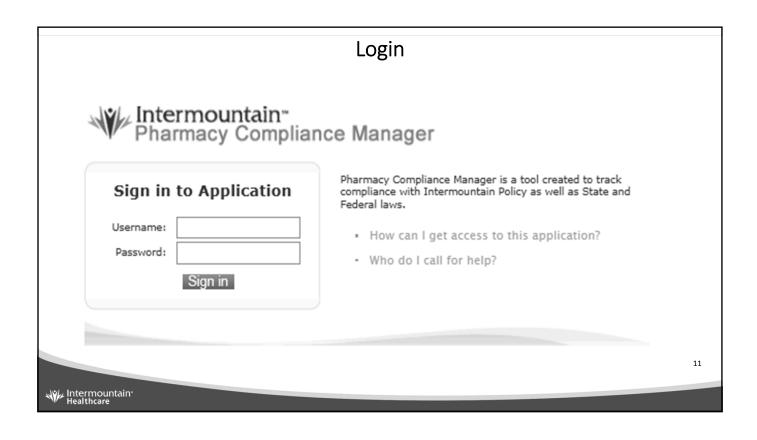
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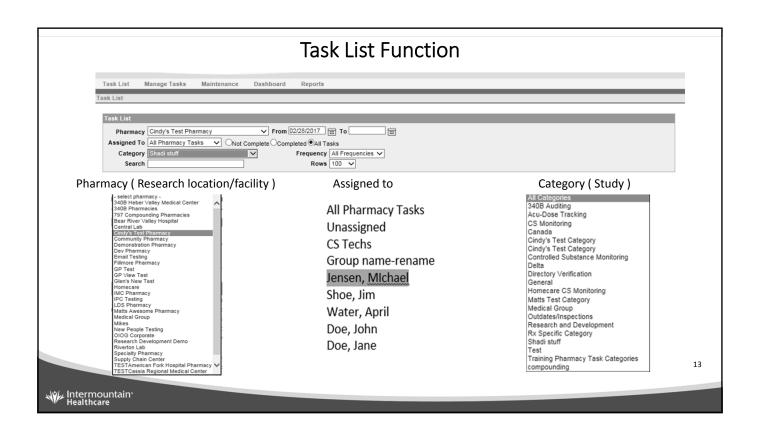
RxCM: Electronic Compliance Manager

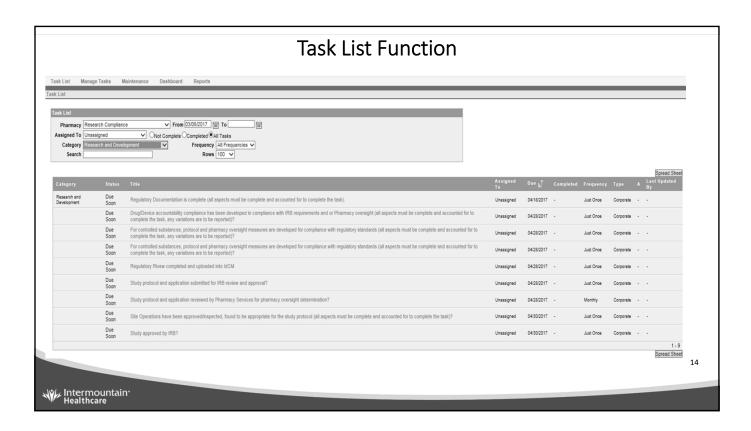
• © 2017 Intermountain Healthcare, All rights reserved A Central APEX Application, version: 1.92



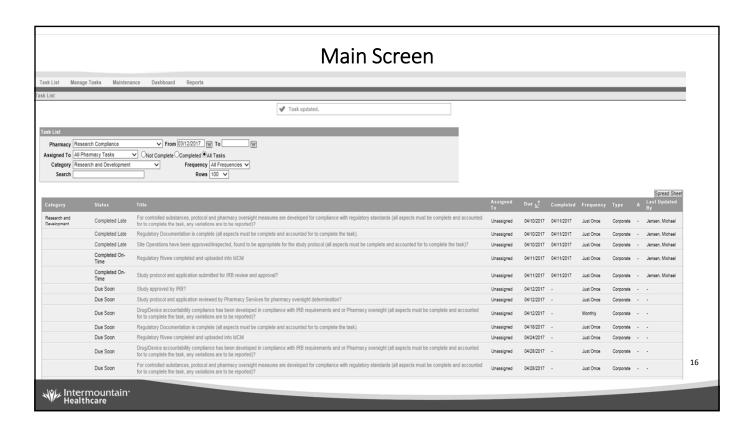


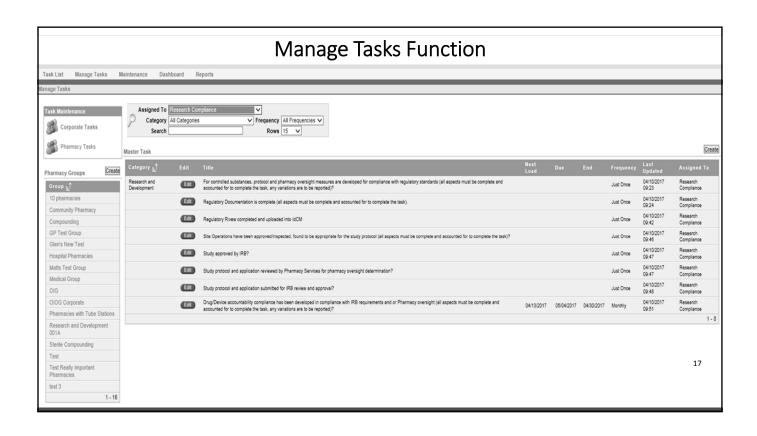


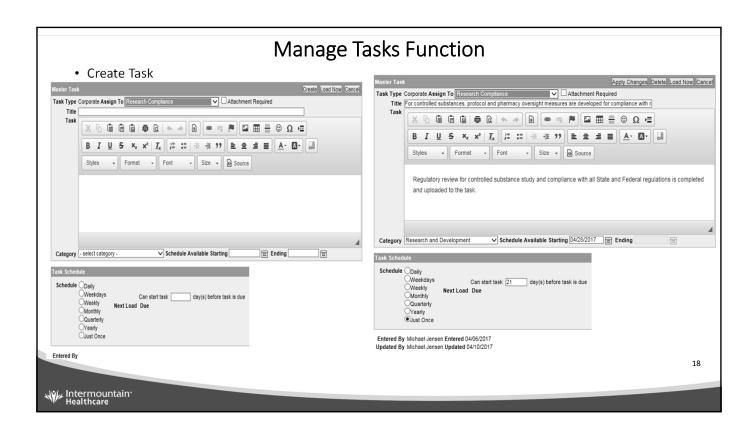


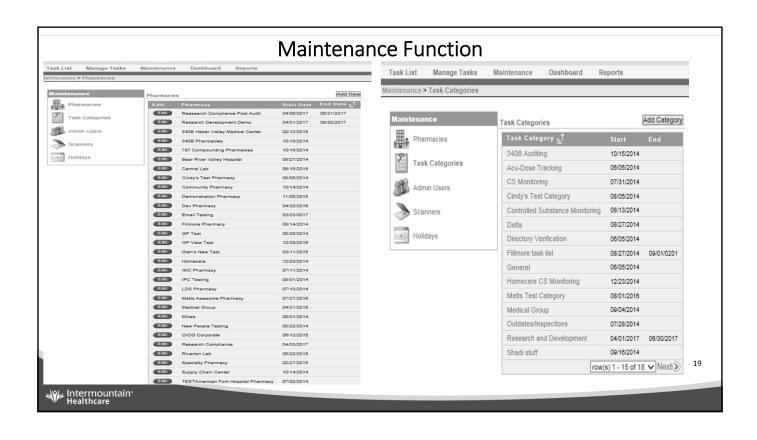


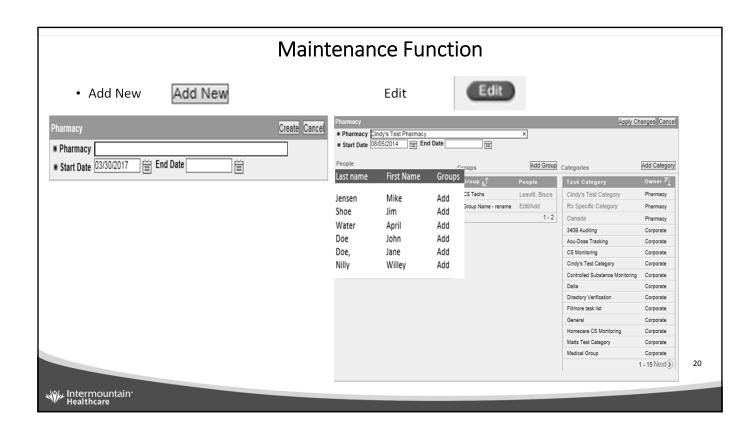


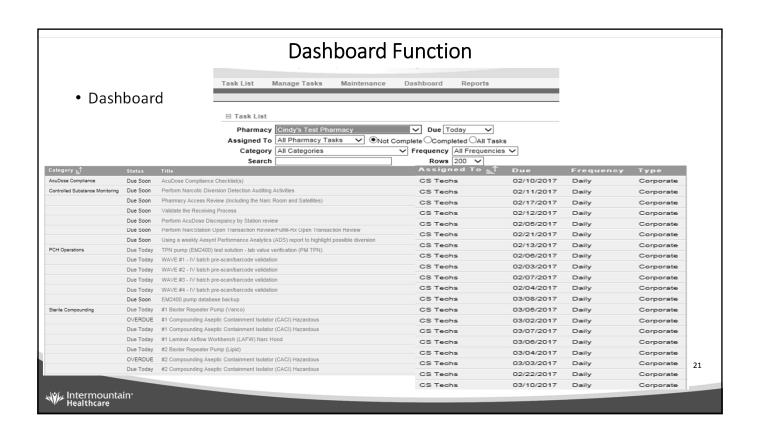


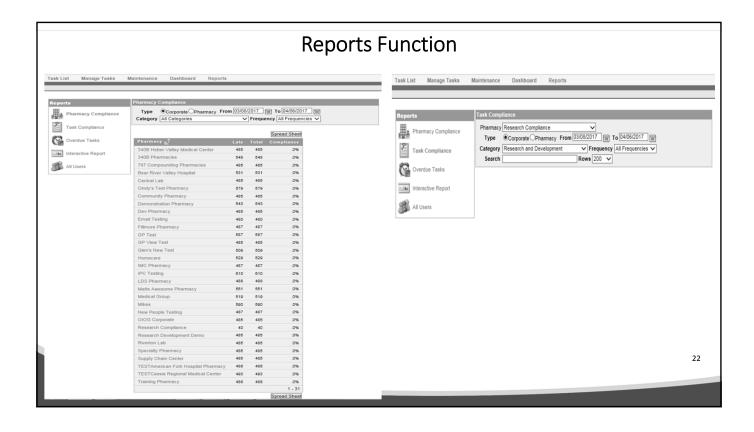


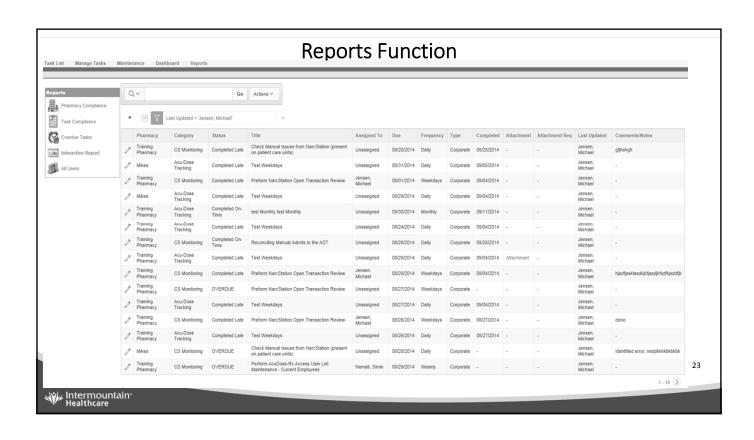


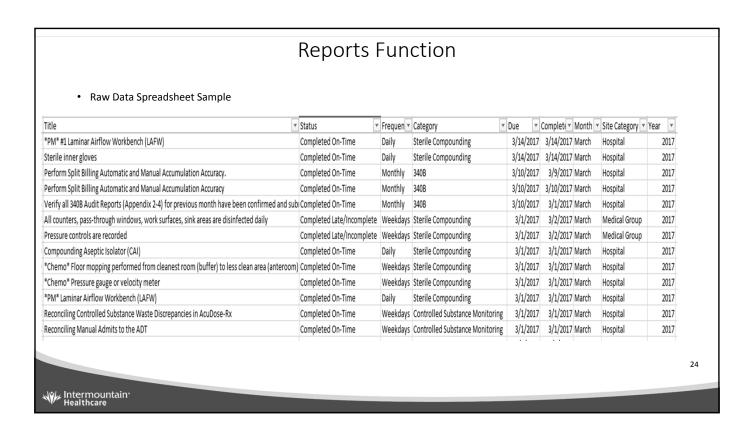


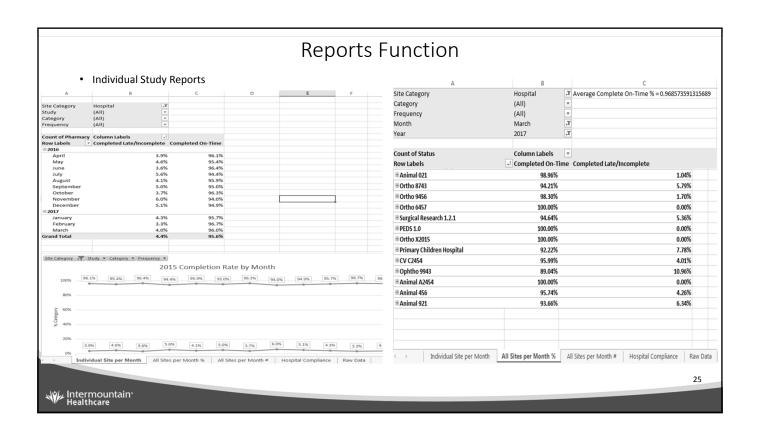


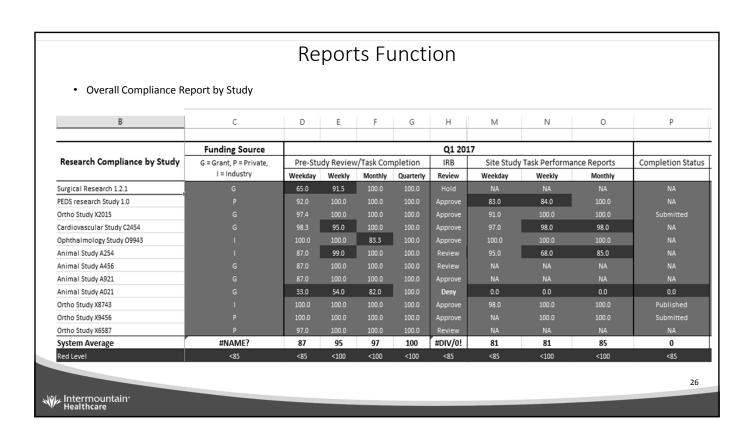












Conclusion

- The use of an electronic compliance database manager provides an efficient method for coordinating, managing, and documenting aspects of compliance for related activities in the health-care setting.
- An electronic compliance database manager provides a tool to organize activities of compliance, tailored to the demands required based on the setting or project being conducted.
- The use of an electronic compliance database manager provides the compliance specialist the ability to organize, validate, audit, report, trend, and assess all research compliance requirements in a healthcare setting.

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Questions?

