



AIFA DETERMINATION 809/2015 ON PHASE I CLINICAL TRIALS: A NEW CHALLENGE FOR THE ITALIAN RESEARCH



E. Marchesi¹, M. Monti², S. Campora³, G. Gentili², P. Frati⁴, S. Pirondi⁵, C. Taverniti⁶, C. Cagnazzo⁷ (on behalf of GIDM)

¹ Italian Sarcoma Group, Bologna; ² Istituto Scientifico Romagnolo per lo Studio e la Cura dei Tumori, Meldola; ³E.O. Ospedali Galliera, Genova; ⁴Istituto Nazionale dei Tumori, Milano; ⁵Ospedale di Sassuolo, Modena; ⁶AOU Città della Salute e della Scienza Presidio Molinette, Torino; ⁷Fondazione del Piemonte per l'Oncologia IRCCS Candiolo, Candiolo.

Background

On 19 Jun 2015 the Italian Competent Authority (AIFA) released the Determination 809/2015 indicating the mandatory requirements for the qualification to conduct Phase I Clinical Trials (CT) in Italy.

Before its entrance into force, on 9 July 2016, we evaluated how and to what extent the major Italian clinical research centers were working to meet the requirements to be qualified as center for Phase I CT research.

Methods

- A Google web based anonymous multiple choice survey was conducted among the site's clinical trial staff of the main Italian centers involved in clinical research.
- The survey were divided in 4 main areas with specific questions addressed to : site characteristics and type of conducted clinical research, site requirements according to Determination 809/2015, local laboratory requirements and Standard Operation Procedures (SOPs) for conducting Phase I trials.
- The survey invitation was sent, through the main oncology networks, to Investigators and CRC on March 2016; data were collected up to 1 May 2016 and analyzed on 5 May 2016

Respondent Characteristics

- 42 responses collected

Type of Institution	Hospital/University	26 (61.9%)
	IRCCS	16 (38.1%)
Divisions	Adult Oncohematology	33 (76.2%)
	Pediatric Oncohematology	5 (11.9%)
	Medical Direction and Ethic Committee	2 (4.8%)
	Other units	3 (7.1%)
Respondents	Clinical Investigators	9 (21.4%)
	CRC/Data Managers	31 (73.8%)
	Unknown	2 (4.8%)

Research Activity at the sites

Nr. of ongoing CT/site	>100	3 (7.1%)
	100-51	7 (16.7%)
	50-41	9 (21.4%)
	40-31	3 (7.1%)
	30-21	6 (14.3%)
	20-11	8 (19.0%)
	1-10	4 (9.5%)
Nr. of Phase I CT conducted in the last 5yrs/site	0	2 (4.8%)
	>7	5 (11.9%)
	6-7	2 (4.8%)
	3-5	11 (26.2%)
	1-2	12 (28.6%)
Type of Phase I CT	0	12 (28.6%)
	FIH in patients	7 (16.7%)
	FIH in healthy volunteers	0 (0.0%)
	No FIH	14 (33.3%)
	FIH and No-FIH in patients only	9 (21.4%)
Nr. of non-profit Phase I CT	No answer	12 (28.6%)
	>7	2 (4.8%)
	6-7	0 (0.0%)
	3-5	1 (2.4%)
	1-2	15 (35.7%)
Phase I disease area	0	24 (57.1%)
	Oncology	39 (92.9%)
	No Phase I trials	3 (7.1%)

Local Laboratory

Phase I requirements

Question	Answer	Result
According to the AIFA Det809/2015 the local lab used for Phase I CT must be compliant with the Appendix 2, is this requirement an issue for your site?	Already compliant	21 (49.9%)
	Easy to achieve	7 (16.7%)
	Related to the costs	7 (16.7%)
	Not achievable in short time	7 (16.7%)

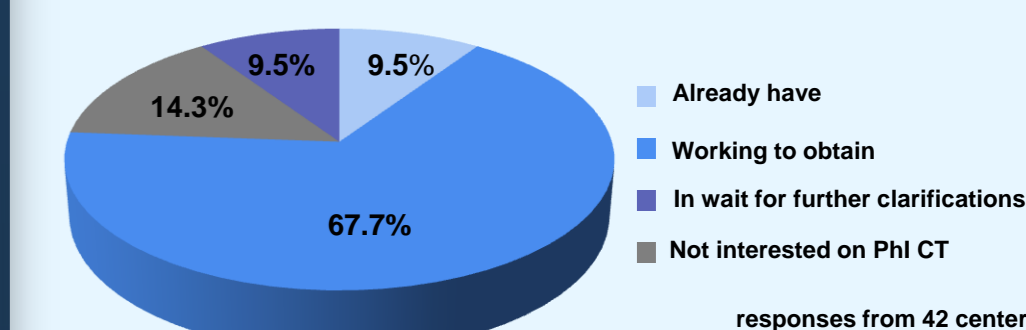
Phase I Unit requirements

Question	Answer	Result
Does your site has the required requirements for conducting Phase I CT according to AIFA Det.809/2015?	Yes: already have them	4 (9.5%)
	Is working to achieve them	28 (66.7%)
	Need of more clarification	6 (14.3%)
	Not interested in conducting Phase I CT	4 (9.5%)
Document archive compliant with the AIFA Det.809/2015 requirement?	Already have	17 (40.5%)
	Not have but easy to achieve	12 (28.6%)
	Not have and related to the costs	8 (19.0%)
Does your site has Clinical Trial Quality Team for conducting no-profit Phase I CT?	Not feasible in short time	5 (11.9%)
	Yes: is already present	16 (38.1%)
	No	10 (23.8%)
Does your site has the required personnel with CT monitoring competencies?	Is in plan	16 (38.1%)
	Yes: internal certified monitors	13 (31.0%)
	Yes: Internal not-certified monitors	5 (11.9%)
	No, but in plan to have	9 (21.4%)
	No, but we'll use monitors from sponsor	11 (26.2%)
Required «link person»	No: outsourcing monitors will be used	2 (4.8%)
	Not interested on Phase I CTs	2 (4.8%)
	Will use CRCs/DMs	32 (76.2%)
	Not yet defined	2 (4.8%)
Does your site has the requirements for Phase I high risk CT?	Require more clarification	5 (11.9%)
	Not interested on Phase I CTs	3 (7.1%)
	Yes; already have them	29 (69.0%)
	Not interested on Phase I CTs	13 (31.0%)

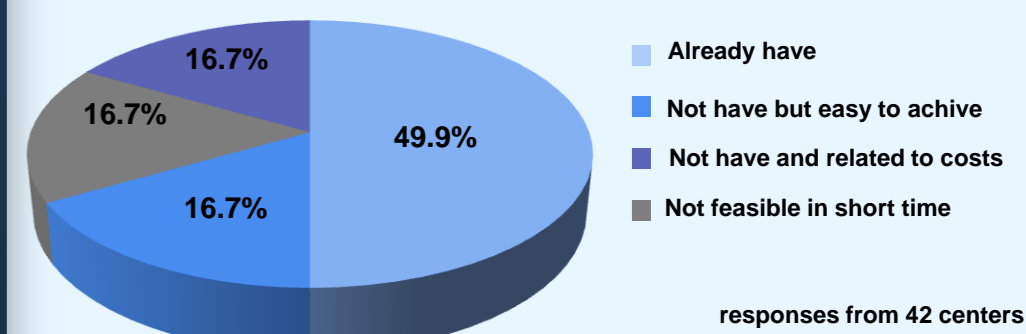
SOP for all the Clinical procedures

Question	Answer	Result
All the clinical activities conducted at the site should be covered by a specific SOP; does your site have them?	SOP already in place only to adapt to the AIFA Det809/2015	24 (57.1%)
	SOP are under implementation	13 (31.0%)
	Not implemented due to lack of competencies	3 (7.1%)
	Not interested on have them	2 (4.8%)

Requirements of the sites to conduct Phase I trials according to AIFA Determination 809/2015



Site's laboratory standard to perform analysis of Phase I trials according to AIFA Determination 809/2015



Conclusions

• The new AIFA Determination for Phase I requires a rigorous and certified organizational model for the sites that want to be on board on early phase research.

• Our survey highlighted that the Italian oncologists involved in Phase I CT are working hard and, although extra resources are needed, they are investing to achieve all the required standards.

• At the time of the results presentation, 33 Italian centers are recognized by AIFA as auto-certified Phase I units and 16 of them are oncology units, while 10 are as whole institute (oncohematology account for 78.8% and 11.5% of them are pediatric)

• Our results shows that, so far, big efforts, have been done in the last months by the centers, to be qualified as Phase I Unit and in the next early future most of the main oncology centers will apply for the self-certification in order to keep Italy as a high qualified and feasible market for Pharma companies where run Phase I CT.