



Patient Case Records Review

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Audit Prep Workshop - Alliance Group Meeting – November, 2014

6 Categories

- Informed Consent
- Eligibility
- Treatment
- Disease Outcome/Response
- Adverse Events/Study Parameters
- General Data Quality

Informed Consent

- Participant signed, dated prior to undergoing any study related procedures
- All required signatures are present
- Current, IRB-approved CF was used
- Any required re-consents
- Non English speaking subjects

Eligibility

- Documentation that all eligibility criteria have been met as specified by the protocol
- All required tests to confirm eligibility were performed prior to randomization
- Tests done within protocol time limits

Treatment

- Specific protocol treatment was given
- Treatment given per protocol timeframe
- Dose Deviations/Modifications
- Additional agent/treatment given?

Disease Outcome/Response

- Accurate documentation of initial sites of involvement
- Re-evaluation of status performed according to protocol
- Protocol-directed response criteria followed
- Verify claimed response (PR, CR)

Toxicity/Study Parameters

- Follow-up studies necessary to assess toxicities were performed
- Grades, types, and attribution of toxicities accurately recorded
- Adverse Event Expedited Reporting filed for required toxicity (CTEP-AERs)

General Data Quality

- Data accurately reported on CRFs
- Forms complete
- Data submitted in a timely manner
- Concordance with source documentation
- Supplemental reports
- Specimens

Source Documents: ALCOA

Attributable: is it obvious who wrote it?

Legible: can it be read?

Contemporaneous: is the information current and in the correct time frame?

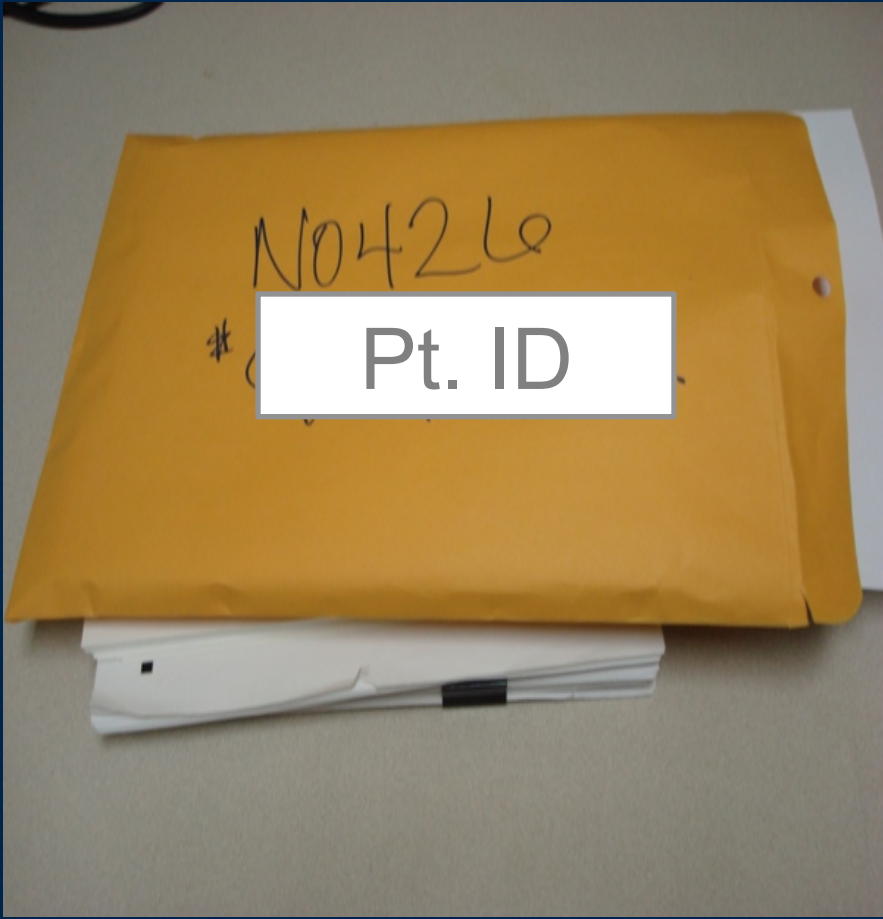
Original: is it a copy; has it been altered?

Accurate: are conflicting data recorded elsewhere?

*Source: “The Facts About Source Documents” by Stan W. Woollen, Presented at the 1999 DIA Annual Meeting

Preparing for an Audit

- Ensure that arrangements have been made:
 - Reserve conference room
 - Notify appropriate personnel
 - Request all required materials
 - Ensure Principal Investigator available
 - Review your records!



CONSENT



ELIGIBILITY



TREATMENT



FOLLOW UP

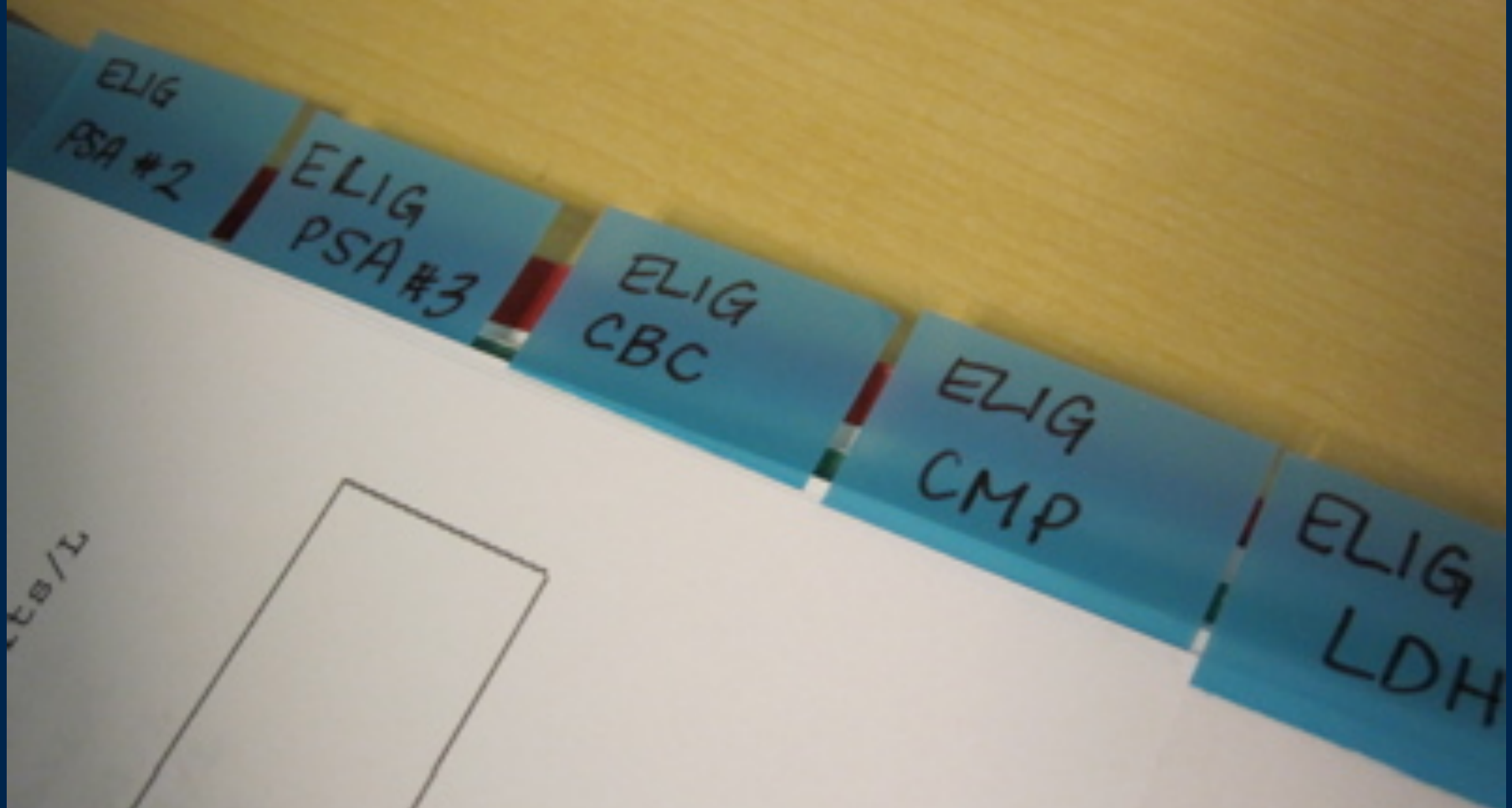


PROGRESSION/
DEATH



SAE









What is a Major Deficiency

CTMB Guidelines Section 5.4.1

- A variance from protocol-specific procedures that makes the resulting data questionable.
- Anything that could affect patient safety.
- An unacceptable frequency of lesser deficiencies may be treated as a major deficiency.

What is a Lesser Deficiency

CTMB Guidelines Section 5.4.2

- A deficiency that is judged not to have a significant impact on the outcome or interpretation of the study and is not described as a major deficiency.

OK, Lesser or Major?

- Patient Case Review –
Informed Consent

Consent form used was not the current IRB-approved version at the time of patient registration; the correct version was signed 1 week after registration.

Ok, Lesser or Major?

- Patient Case Review – Eligibility

A pregnancy test was not done pre-randomization in this documented premenopausal patient. There was no documentation regarding sexual activity and/or use of contraceptives. Of note, a pregnancy test done after randomization but before treatment was negative.

Ok, Lesser or Major?

- Patient Case Review – Eligibility

The physician signed and dated an eligibility checklist indicating that all eligibility criteria are met. The required hemoglobin is >9.0 gm/dL, but the lab result printout indicates the hemoglobin is 8.9 gm/dL.

Ok, Lesser or Major?

- Patient Case Review – Treatment

Carboplatin dose given was 760 mg, but calculated dose was 693 mg.

Ok, Lesser or Major?

- Patient Case Review – Treatment

Patient was given IV Dexamethasone instead of oral Dexamethasone as a premed for cycle 1.

Ok, Lesser or Major?

- Patient Case Review – Treatment

Documentation of patient counseling for lenalidomide was done at baseline, but not at the monthly dispensing of agent as required per Section 10.6.

Ok, Lesser or Major?

- Patient Case Review –
Adverse Event/Study Parameters

TSH/T4 levels were not checked at the required timepoints of 6 months, 12 months and post treatment.

Ok, Lesser or Major?

- Patient Case Review –
Adverse Event/Study Parameters

A CTEP-AERs report (expedited adverse event reporting) was not submitted for cycle 1 hospitalization due to neutropenic fever.

Additional Instructions or Exclusions to AdEERS Expedited Reporting Requirements for Phase 2 and 3 Trials Utilizing an Agent Under a CTEP IND:

- All adverse events reported via AdEERS (i.e., serious adverse events) should also be forwarded to your local IRB.
- For the purposes of expedited adverse event reporting, the CAEPR for azacitidine may be found in [Section 16.2](#) below.
- Grade 3/4 myelosuppression and hospitalization resulting from such do not require AdEERS, but should be submitted as part of study results. All other grade 3, 4, or 5 adverse events that precipitate hospitalization or prolong an existing hospitalization must be reported via AdEERS.
- AdEERS reports are to be submitted electronically (http://ctep.cancer.gov/protocolDevelopment/electronic_applications/adeers.htm) to the CALGB Central Office (CALGB@uchicago.edu). Faxed (312-345-0117) copies of the AdEERS paper template (downloadable from the AdEERS web page) will also be accepted, but electronic submission is preferred.
- The reporting of adverse reactions described in the tables above is in addition to and does not supplant the reporting of adverse events as part of the report of the results of the clinical trial, e.g., study summary forms or cooperative group data reporting forms (see [Section 6.1](#) for required CALGB forms).
- All deaths within two years following protocol treatment that are not due to disease progression should be reported as adverse events.

16.2 Comprehensive Adverse Events and Potential Risks List (CAEPR) for Azacitidine (NSC 102816)

The Comprehensive Adverse Event and Potential Risks list (CAEPR) provides a single list of reported and/or potential adverse events (AE) associated with an agent using a uniform presentation of events by body system. In addition to the comprehensive list, a subset, the Specific Protocol Exceptions to Expedited Reporting (SPEER), appears in a separate column and is identified with bold and italicized text. This subset of AEs (SPEER) is a list of events

Ok, Lesser or Major?

- Patient Case Review –
Adverse Event/Study Parameters

Scan reports were not available for auditors to review. Unable to confirm reported date of progression.

Ok, Lesser or Major?

- Patient Case Review –
Adverse Event/Study Parameters

The subject has been non-compliant with follow-up visits. There is good documentation of clinic scheduling and attempts to contact the subject.

Ok, Lesser or Major?

- Patient Case Review –

General Data Quality

The eligibility form due at baseline (10/19/13) was submitted 3/12/14 (3-6 months late).

Ok, Lesser or Major?

- Patient Case Review –

General Data Quality

The reported baseline value of AST is 43, but source documentation indicates value should be 53.

Ok, Lesser or Major?

- Patient Case Review –

General Data Quality

The frozen specimens due at baseline were not submitted to the Pathology Coordinating Office by the time of the audit, 2 years later.

Common Findings

- Informed Consent
 - Re-consenting not done
 - Blanks remain blank
- Eligibility
 - Performance status not documented
 - Tests done out of window
- Treatment:
 - Oral compliance not documented
 - Dose modifications not done or not within requirements of the protocol

Common Findings

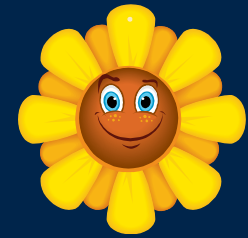
- Disease Outcome/Response
 - All initial sites of disease not reported at baseline
 - New sites of disease not reported
- Adverse Events/Study Parameters
 - Toxicity assessments not performed or inconsistent
 - Unnecessary reporting of AEs < grade 3
- General Data Quality
 - Corrections not done correctly
 - Delinquent data

Component Evaluation

CTMB Guidelines Section 5.4.3

- Acceptable
 - No Major deficiencies found during the audit
- Acceptable needs follow-up
 - One or more major deficiencies found
- Unacceptable
 - Multiple Major deficiencies or flagrant deficiencies found (re-audit required)

Want an easier audit day?



- Document!
 - If it is not documented, it did not happen
- Communicate!
 - Don't be afraid to ask questions
- Keep records audit ready
 - Tag paper charts or keep summary sheet for electronic records as you go along

Summary Sheet

Alliance Study #

Patient #

Signed ICF:

Enrolled:

Eligibility

Path:

H&P:

Labs:

CT chest & up abd:

Bone Scan:

Other:

Treatment

Cycle 1

|

Cycle 2

Cycle 3

Cycle 4

Cycle 5

Cycle 6

Response

Prior to Cycle 3 scan

Prior to Cycle 5 scan

End of treatment

Relapse

Last Follow-up

Questions?





2014 Fall Group Meeting

November 5 – 8 / Chicago, IL