

Achieving ICH GCP Compliance In The Face Of Cultural Challenge

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The Scope Of The Challenge

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Why Use The ICH GCP?

- Internationally recognized/accepted
- Declaration of Helsinki provides principles
- ICH GCP Guideline defines “What” and “How”
- Supports Good Science

Challenges To The Use Of One International Standard

We are different!



Areas of Cultural Difference That May Impact GCP Compliance

Living Conditions

Language

Time

Literacy

Areas of Cultural Difference That May Impact GCP Compliance

Transportation

Social Hierarchy

Food & Drink

Government

Areas of Cultural Difference That May Impact GCP Compliance

The Role of the
Physician in Society

Health Care Provision
by Non-physicians

Clinical Practice

Medical Facilities/
Infrastructure

Overcoming the Challenges

Conducting GCP-compliant Research Requires:

- Local Knowledge
- Creative thinking and a pro-active approach
- “Work-arounds”
- Training

Training and Equipping To Overcome Challenges

Training Methods/Approaches

- Provide simple and clear written materials
- Translate as needed
- Use workshops/hands-on activities to teach GCP
- Teach why, what, and how
- Instill confidence

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Implementation Issues

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The Cornerstones Of GCP

Source Documentation

- “The Key to Good Clinical Practice”
- “If it’s not documented it didn’t happen”

The Cornerstones Of GCP

Effective Informed Consent Process

- “provision of information”
- “comprehension of information”
- “fully voluntary participation”

Source Documentation (The Key to Good Clinical Practice)

Helps to ensure that....

- Rights, safety and well-being of participants is protected
- Clinical trial data are reliable and accurate

Source Documentation (The Key to Good Clinical Practice)

- It provides evidence that the trial was conducted according to the protocol.
- It is an “historical” document that allows the recreation of everything that happened during the study.

Source Documentation

Common Misconception

Case Report Forms should look perfect!

- Wrong...neatness counts but no one is perfect all the time
 - Use proper error correction
 - No correction fluid or pencil
 - A single line through the error, date, initial

Source Documentation Challenges

A monitor is reviewing a chart in Africa and finds the following...

- “she vomited x6 on Friday”then in the next entry “he was told to take the new medication for 3 days”.
- What happened? Entry made in wrong chart?

No Personal Pronouns In The Local Language!

Solution....

- Ask staff to try to be consistent in documentation
- Use this as an opportunity to provide some additional training to staff whose first language may not be English.

Source Documentation Challenges

When it's 09h00 in Washington, what time is it in Guangxi, China?

- “Officially”23h00 because China only has one time zone... Beijing time
- “Local” time....
 - Solution: Document consistently.

Note* www.timezoneconverter.com

Source Documentation Challenges

Developing country issues:

- Rudimentary medical records
- Limited storage space
- Limited filing experience
- Typical hospital chart

Solution

- Evaluate hospital's record keeping system **before** starting a study.
- Invest in building site capacity.

Source Documentation Challenges

Regulatory file review in Thailand

- 1st subject enrolled 21 Jun 01
- IEC approval dated 06 May 2543!

Not a typo....Buddhist countries frequently use the Buddhist system for numbering years...subtract 542

Note* Buddhist year does not change on 01 Jan

Informed Consent

- Provision of information
- Comprehension of information
- Fully voluntary participation

Provision of Information

- Use local translator!
- Back translations are an excellent idea!
 - “freedom to withdraw” was translated as
“I don’t care if you participate or not”
 - “you might feel dizzy and faint with blood draws”
Interpreted as being possessed by evil spirits

Provision of Information

Not only how the information is presented
but by whom!

HIV vaccine trial in Haiti...3 information
sessions with a counselor vs. 1 with the PI
significantly improved participants
comprehension of IC information

Comprehension of Information

What do you do if an illiterate participant refuses to have a witness present?

- Use a family member, friend or another staff member
- Refusal to consent = no enrollment

Comprehension of Information

- Some HIV vaccine trials use a test of comprehension of information following counseling.
- Volunteers who can't demonstrate their comprehension of these trials should not be enrolled.

Fully Voluntary Participation

Usually denoted by a “signature”

Problems:

- Signature may be foreign in some cultures
- Illiteracy sometimes promotes distrust
- Use of a “mark” is common...but may look different every time...so a note in the source document should be made

Fully Voluntary Participation

Challenges

- “Community based consent”
 - Required in some villages in Africa and Asia
 - * Get village elders involved before attempting to get individual consent
- Status of women
 - In some cultures they have much lower literacy rates and autonomy is an alien concept.
 - First you must build trust!

Fully Voluntary Participation

Challenges

- Respect for authority may make some potential participants reluctant to say “no”
 - In a recent study in Thailand the trial was quickly enrolled but many volunteers did not return for follow-up visits....why?
 - It would have been disrespectful to say they were really not interested in the study!

Dangers!

Social Harm

- In HIV vaccine studies.....lots of pitfalls
 - Some may assume they are “protected” and engage in risky behaviors
 - Others might think the volunteers are already infected
 - Or at greater risk of infection

There is still a stigma associated with **HIV/AIDS** in many parts of the world.

Suggestions

Learn everything you can about the country, region, town, village **before** starting a study

- India is a very large and culturally diverse country...don't assume that what works in the north will work in the south!
- A local in-country partner is a real asset!

Suggestions

Concomitant Medications?

- Non-traditional medicines and herbal remedies

Evaluate basic needs prior to starting a study

- Storage space may be at a premium
 - Charts, log books, records, study product
- Remember A4 paper!

Suggestions

Biological Samples

- Plan your protocol appropriately!
 - Malawi there is great sensitivity to removing blood samples from participants

Don't minimize cultural beliefs about disease...
biological vs. spiritual basis

GCP Challenges

Cultural Diversity

- Be accepting
- Be accommodating
- Recognize the ethical norms
- Be cautious about undue inducement



Take back an appreciation for the cultural diversity
of our planet.

Leave them with the training and tools to build the
capacity for their own research infrastructure.

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