Ethical challenges with pragmatic RCTs: General issues and special considerations in dementia

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Housekeeping

- All participants will be muted

- Enter all questions in the Zoom Q&A or chat box and send to All Panelists and Attendees

- Moderator will review questions from chat box and ask them at the end

- Want to continue the discussion? Look for the associated podcast released about 2 weeks after Grand Rounds.

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Objectives

1. Discuss key features of pragmatic RCTs and the contexts in which ethical issues arise
2. Outline a program of research to develop principle-based guidance for the ethical design and conduct of pragmatic RCTs
3. Describe key ethical issues raised by pragmatic RCTs and which may be particularly salient to the ADRD context
4. Describe the challenges of identifying a sample of pragmatic RCTs from the literature
5. Describe the landscape of key ethical issues in published pragmatic RCTs in ADRD
The increasing popularity of pragmatic trials

- **Pragmatic RCTs** are intended to have their results be applicable to clinical or health policy decisions and should thus mimic as closely as possible the users, settings and circumstances in which it is thought the interventions under evaluation will be used.

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Cumulative number of publications in PubMed using the words "pragmatic" and "trial" in the title or abstract (searched 12 September 2019)

• Tools such as PRECIS-2 have been designed to assist investigators prospectively think about the degree of pragmatism in their trial.
A principle-based approach to ethics guidance

- To date much of the research has been:
  - Limited to a few specific topics (e.g. consent)
  - Based on vignettes or hypothetical in nature
  - Restricted to few jurisdictions (e.g. US)

- The overarching goal of our project is to develop principle-based guidance for the ethical design and conduct of pragmatic trials
  - Empirical analyses: literature review(s), primary data collection
  - Conduct ethical analyses
  - Consensus process
Ethical challenges in pragmatic RCTs
1) Empirical Work:
   a) Key informant interviews
   b) Review of completed and ongoing trials
   c) Survey of trialists
   d) Survey of research ethics committees in Canada, USA, UK, France and Australia
   e) Focus groups with trial participants and gatekeepers, and a community survey

2) Conceptual Work:
   Ethical and normative analysis

Team produces a series of background documents laying out proposed solutions with principles, policy options and rationale

Ethical issues in pragmatic randomized controlled trials: a review of the recent literature identifies gaps in ethical argumentation

Cory E. Goldstein, Charles Weijer, Jamie C. Brehaut, Dean A. Fergusson, Jeremy M. Grimshaw, Austin R. Horn and Monica Taljaard

The ethical challenges raised in the design and conduct of pragmatic trials: an interview study with key stakeholders

Stuart G. Nicholls, Kelly Carroll, Merrick Zwarenstein, Jamie C. Brehaut, Charles Weijer, Spencer P. Hey, Cory E. Goldstein, Ian D. Graham, Jeremy M. Grimshaw, Joanne E. McKenzie, Dean A. Fergusson, Monica Taljaard, on behalf of the Ethics of Pragmatic Trials project

Ethical and Regulatory Issues for Embedded Pragmatic Trials Involving People Living with Dementia

Emily A. Largent, JD, PhD, RN,* Spencer Phillips Hey, PhD,* Kristin Harkins, MPH,* Allison K. Hoffman, JD, Steven Joffe, MD, MPH,* Julie C. Lims, PhD, MPH,* Alex John London, PhD,** and Jason Karlawish, MD***

Achieving Health Equity in Embedded Pragmatic Trials for People Living with Dementia and Their Family Caregivers

Ana R. Quiñones, PhD,* Susan L. Mitchell, MD,‡ Jonathan D. Jackson, PhD,* Maria P. Aranda, PhD,* Peggye Dilworth-Anderson, PhD,* Ellen P. McCarthy, PhD,* and Ladson Hinton, MD**
Key ethical issues

• What are the ethically important distinction(s) between research, clinical practice and quality improvement in pragmatic trials (if any)?
  – What criteria should be used to determine the type of oversight and regulation necessary for a pragmatic RCT? How would regulatory oversight differ depending on the conclusion?

• When are alterations and waivers of traditional informed consent appropriate in pragmatic RCTs? For what is consent required?
  – For PLWD, how is capacity considered or evaluated? When are substitute decision-makers required? What role for assent, even if full consent is waived? What role for notification?

• Who are the stakeholders who have roles or responsibilities in relation to the trial (and how do we determine the individuals or groups who have roles)? What are their duties or responsibilities within the trial?
  – E.g. nursing home staff, owners, managers
Key ethical issues

• Who are the individuals or groups affected by the trial (and how do we determine who have legitimate claims on those conducting the trial)?
  – How should we think about dyads of PLWD and their caregiver? Are there responsibilities to caregivers who may be directly impacted by the involvement of a dementia patient in an RCT, even if the caregiver is not a research participant?
  – What special protections should be in place, and for whom?

• What are the responsibilities of identified stakeholders with respect to equity of access to pragmatic RCTs for those who are eligible? How should these responsibilities be determined?
  – Are there systemic barriers based on circumstance rather than inclusion/exclusion criteria?
Identifying key ethical issues within published pragmatic RCTs
How do we identify a published pragmatic RCT?

• Existing reviews largely relied on self-identification as a pragmatic RCT - no reporting guidelines require pragmatic trials to be labelled as such

• No single defining characteristic of a pragmatic RCTs

• Retrospective analysis using PRECIS-2?
  – Designed for prospective use by investigators when developing their own trial
  – Subjective assessment for scoring
  – No agreed thresholds for scoring or dichotomisation (continuum)
  – Should all PRECIS-2 domains be weighted equally?
  – Limits of reporting
  – PRECIS-2 not designed for certain types of trial e.g. cluster RCTs
Identifying trials more likely to be pragmatic

- Key terms
  - Design terms: e.g. pragmatic, real world, unblinded, cluster, stepped wedge, phase IV
  - Attribute: e.g. primary care, comparative effectiveness, evidence based, patient oriented, usual care, registry based

- Search performance is superior to other ad hoc filters for pragmatic trials.

- Improved efficiency over the Cochrane search for randomized trials which retrieves 4.5 million records.
Landscape analysis

- Searched MEDLINE, Jan 1 2014 – 3 April 2019 (date of search)
- Excluded if:
  - Not an RCT
  - Pilot or feasibility study, or <100 participants
  - Not health or healthcare related
  - A non-primary trial report
  - Clearly not pragmatic, e.g. focused on isolating a biological impact of an intervention without a clear clinical implication, or trial that did not assess clinical outcomes.
- Yielded 4337 trial reports

<table>
<thead>
<tr>
<th>Item</th>
<th>N (%)</th>
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| Self-identification as “pragmatic”:
  - Anywhere (title, abstract or main text) | 964 (22.2%) |
  - In title or abstract | 534 (12.3%) |
  - In main text only (not in title or abstract) | 430 (9.9%) |
| Identification as pragmatic by NLM
  - Pragmatic Clinical Trial as Publication type* | 268 (6.2%) |
  - Pragmatic Clinical Trials as Topic* | 22 (0.5%) |
The reporting of ethical issues in pragmatic trials with PLWD
The reporting of ethical issues in pragmatic trials with PLWD

• From the larger sample of pragmatic RCTs (n=4337) identified trials that:
  – Specifically focused on (a) people living with dementia and/or their caregivers, or (b) a broader cohort of older adults which included a subgroup with dementia and conducted a stratified or subgroup analysis on that cohort
  – Applied a search filter from the Cochrane dementia and cognitive improvement group and MeSH terms to identify trials exclusively in those aged 65 and over
  – Final sample included N=62 RCTs

• Goal: To describe the reporting and ethical conduct of pragmatic trials in ADRD, with specific reference to previously identified ethical challenges
  – Focus on research-care distinction, human subject identification (including vulnerable groups and equity), consent approaches
## Trial demographics (N=62)

<table>
<thead>
<tr>
<th>Country</th>
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<tr>
<td>Canada</td>
<td>3%</td>
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<tr>
<td>United States</td>
<td>21%</td>
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<tr>
<td>United Kingdom</td>
<td>23%</td>
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<tr>
<td>European Union</td>
<td>27%</td>
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<tr>
<td>Australia or New Zealand</td>
<td>8%</td>
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<tr>
<td>LMIC</td>
<td>6%</td>
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<tr>
<td>Other</td>
<td>15%</td>
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**Unit of randomisation**

- Individually randomised: 39%
- Cluster randomised: 61%
Trial setting (n=62)

- Primary care: 13%
- Hospital care: 10%
- Nursing homes: 45%
- Communities: 24%
- Other: 8%
## Data extraction

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<td><strong>Research/care distinction</strong></td>
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<td>What modes were used for obtaining consent (e.g. verbal, written etc)</td>
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Research/care distinction (n=62)

Reported ethics review process

- Yes - submitted: 97%
- Yes - exempt: 2%
- Yes - not submitted: 0%
- No statement about ethics review: 2%
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A research participant can be identified as an individual whose interests may be affected as a result of study interventions or data collection procedures, that is, an individual

1. who is the intended recipient of an experimental (or control) intervention; or

2. who is the direct target of an experimental (or control) manipulation of his/her environment; or

3. with whom an investigator interacts for the purpose of collecting data about that individual; or

4. about whom an investigator obtains identifiable private information for the purpose of collecting data about that individual.”
Subject identification

Who were the research subjects

- Patient with dementia only: 31%
- Caregiver of patient with dementia only: 29%
- Healthcare professional only: 5%
- Patient with dementia & caregiver only: 2%
- Patient with dementia and healthcare professional only: 10%
- Caregiver and healthcare professional only: 2%
- Patient, caregiver and healthcare professional: 0%
Intervention (N=62)

- Educational intervention targeting health professionals: 31%
- Quality improvement targeting organization/health care system: 27%
- Patient non-pharmacological intervention: 47%
- Patient pharmacological intervention: 5%
- Any intervention targeting the patient-caregiver dyad: 21%
- Any intervention targeting caregiver only: 13%

Multi-selections possible if multiple interventions
Multi-selections possible if multiple methods of data collection
Subject identification: vulnerable groups

1. Those with dementia, a cognitive impairment, or determined not to have capacity (Aus. National Statement)
2. Prisoners (CIOMS, ICH GCP,Aus. National Statement, TCPS2, Common Rule)
3. Patients in emergency setting (CIOMS, Clinical Trials Regulation, ICH GCP, TCPS2)
4. Subordinate members of hierarchies or relationships (for example, Nursing home staff or “medical and nursing students, subordinate hospital and laboratory personnel, employees of pharmaceutical companies, and members of the armed forces or police"(as per CIOMS)) (CIOMS, ICH GCP, Aus. National Statement)
5. Homeless persons (CIOMS, ICH GCP)
6. Institutionalised persons, or those with mental health problems beyond dementia (e.g. psychosis, learning disabilities etc.) (Clinical Trials Regulation, Aus. National Statement, TCPS2, UK Research Governance Framework, Belmont report)
7. Persons in nursing homes (CIOMS, ICH GCP)
8. Refugees or displaced persons (CIOMS, ICH GCP)
9. Economically disadvantaged persons (Belmont Report, Common Rule)
10. Patients in terminal care or who have life-threatening diseases (Australian National Statement, CIOMS, Belmont report)
11. Elderly persons (here defined as ≥ 65 years) (CIOMS, Clinical Trials Regulation, TCPS2)
12. Pregnant or breastfeeding women (Clinical Trials Regulation, Common Rule)
13. Specific ethnic, racial minority, linguistic, or ethnocultural groups (CIOMS, ICH GCP, TCPS2, Belmont Report)
14. Other (specify)

Vulnerable groups included/excluded*

* Note: multiple selections possible
For example,

- “Time was also taken within supervision to highlight the importance of behaving ethically and safely in all aspects of clinical work, for example reflecting on maintaining clear boundaries clinically and how to practise safely when working alone in people’s homes.”

- “Our study was not powered to find a significant change in abuse and for ethical reasons we made clinicians aware of clinically significant abusive behaviour in the control group; thus, abused carers in this group were often offered clinical and social support as well as monitoring of the behaviour and, if felt appropriate, adult protection measures were taken.”
Equity: subgroup analysis (PROGRESS)

1. Place of residence (e.g. rural vs urban, but also comparison of countries, regions or towns)
2. Race/ethnicity/culture or language (e.g. comparisons by race, cultural norms, or language especially if it is a language that isn’t the primary language of the jurisdiction where the trial is being conducted)
3. Occupation (e.g. analysis of migrant workers, by employment status)
4. Gender/Sex (e.g. comparisons by biological sex or self-identified gender including transgender)
5. Religion (e.g. comparisons made by religious affiliation – including non-religious – or religious commitment)
6. Education (e.g. comparisons by level of education attained)
7. Socioeconomic status (while there may be overlap with education, tends to be income-related such as household income, type of dwelling etc.)
8. Social capital (refers to social relationships or networks, or community or civic partnerships. Examples include comparisons between isolated individuals or individuals living alone vs households with multiple members)
9. Other (e.g. disease status or presence of comorbidities or disabilities)
10. No subgroup analyses conducted

Subgroup analyses: PROGRESS-Plus (N=62)

* 9/10 listed as other were based on disease severity
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Individual-level consent

• No explicit mention of waiver of consent in any study

• 55/62 (89%) studies involved patients with dementia and reported individual level consent was obtained
  – Over half (51%) failed to specify what consent was for (e.g. data collection, intervention)
  – 41/55 (75%) studies employed a substitute decision-maker (proxy consent) for at least some patients (e.g. if patient could not provide individual consent)
  – 9/55 (16%) studies reported patient assent
  – 16/55 (29%) studies explicitly reported a capacity assessment relating to individual consent
    • Only 4 studies described the tool or framework used to assess capacity
Discussion
Take home messages

• Pragmatic RCTs raise a number of ethical issues
  – research/practice distinction, human subject identification (including vulnerability, special protections, and equity), consent, gatekeepers, and implications from non-clinical settings.

• Each potentially pose challenges for ethics review and regulation

• Empirical studies of published pragmatic RCTs are challenging due to complexity of the concept of pragmatism, incomplete reporting, and suboptimal indexing
  – Relying on the use of the term pragmatic or indexing of trial likely to miss a large proportion of likely pragmatic RCTs

• However, our validated search filter showed excellent specificity and yielded over 4000 trials
Take home messages

• Published pragmatic RCTs in ADRD or with PLWD are highly diverse
  ‒ Many with cluster design, but patient level research-specific data collection

• Human subject identification is complex
  ‒ Studies focused on patients, caregivers, and healthcare professionals. A large proportion of cluster RCTs and health policy/system interventions which add further complexity

• Many ADRD studies relied on substitute decision makers.
  ‒ Need for improved reporting (and/or practice) regarding when and how decisions about substitute decision makers are made.
  ‒ Few additional special protections noted, despite explicit inclusion of vulnerable populations

• Few studies conducted subgroup analyses
Acknowledgements

• Monica Taljaard
• Kelly Carroll
• Hayden Nix

• CIHR Ethics of Pragmatic trials team

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