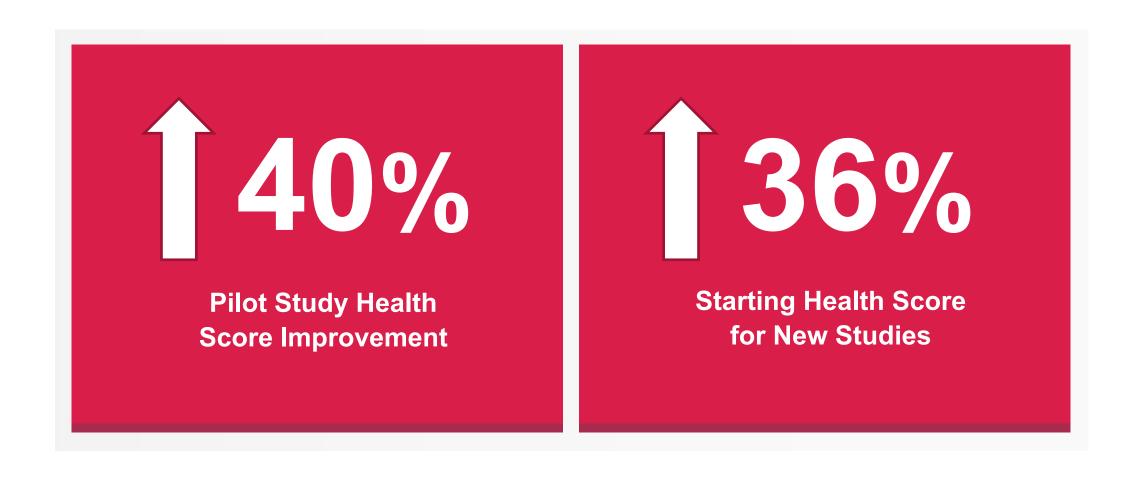
REFINING A RISK-BASED TMF MANAGEMENT APPROACH

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Standardized Risk-Based Approach Enables Better Oversight



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Astellas' Global TMF Team Manages More Than 50 Studies

Global TMF team:

12

including 5 TMF compliance managers Study volume:

50+

global studies, all phases

eTMF system:

Astellas Vault Clinical for all studies

TMF management:

50%

in-house

50%

CROs

Where We Started

Implemented a Risk-Based TMF Approach in 2021



Challenge:

- TMF Transformation
- Inspections found inconsistent frequency and percentage of documents in TMF checks



Goal:

- Define what and when to review, with consistent guidance for all studies
- Increase study team engagement

Start with the essentials to standardize TMF health checks and reduce inspection risks

Initial Outcome: Risk-Based Approach Reduces Effort for Study Teams



Reduced document QC **40%** with classification tiering and auto-approvals for low-risk documents



Provided **guidance** for quarterly functional area TMF health checks

A risk-based approach helps study teams focus on what matters most

What We Adjusted

New Additions



TMF Compliance Manager Role



TMF Health Score

Take a collaborative approach to help study teams embrace the process

Health Score Weights Metrics Depending on Effort





Health Score Targets

90-100% GREEN

80-89% YELLOW

0-79%

Health Score Comprised 10 Metrics

Completeness

- % docs present for study milestone(s)
- 2. average of countries
- 3. average of sites

Quality

- 4. # days QIs overdue
- 5. # overdue QIs
- 6. # docs QC rejected >30 days
- 7. # overdue QC workflows
- 8. # in-progress workflows
- 9. # in-progress >7 days

Timeliness

10.# docs created >60 days

Pilot Studies Signaled Refinement Needed

Pilot: 13 pilot studies well below target score

Update 1: Refined weighting of health score

Update 2: Added a second timeliness metric

Timeliness (1)

docs created >60 days

Timeliness (2)

days for records submission

Continue to refine the health score and combine it with a scorecard to drive the right action

TMF Health Score Reporting Process



Enter data into metrics tab



Compare current to previous



TMF COMPLIANCE MANAGER
Provide remediation
suggestions



AUTOMATED

Calculate TMF
aggregate score



TMF COMPLIANCE MANAGER
Perform quarterly
check with study
teams



TMF COMPLIANCE MANAGER
Compare periodic
scores

Sample TMF Health Scorecard: Overview

Study Number	Compat Devian	Previous Review	Comments	Metric	Total Points Possible =
Timeliness	Current Review	Previous Review	Comments	Score	300
Average Days for Submission	70%	74	60 days or less = 30 (green); 61 to 90 days = 22 (yellow); 91 or more days = 0 (red)	22	30
% of Records Created within 60 Days	74%	78%	75% to 100% = 30 (green); 60% to 74% = 22 (yellow); 59% or less = 0 (red)	22	30
Quality					
Longest Quality Issue Resolution Timeframe	0	0	0-30 = 10 (green); 31-60 = 7.5 (yellow); 61+ = 0 (red)	10	10
Total # Overdue Quality Issues	0	0	1-10 = 20 (green); 11-15 = 15 (yellow); 16+ = 0 (red)	20	20
Longest Overdue QC Rejected	0	0	0-30 = 10 (green); 31-60 = 7.5 (yellow); 61+ = 0 (red)	10	10
Total # of Overdue QC Rejected >30 Days	0	0	1-10 = 20 (green); 11-15 = 15 (yellow); 16+ = 0 (red)	20	20
Longest In Progress Record Timeframe	13	144	0-30 = 10 (green); 31-60 = 7.5 (yellow); 61+ = 0 (red)	10	10
Total # Number of In Progress workflows	1	2	1-10 = 20 (green); 11-15 = 15 (yellow); 16+ = 0 (red)	20	20
TMF Completeness					
Study Level	90%	80%	90% or higher = 50 (green)	50	50
Country Level Overall	87%	48%	80% - 89% = 37.5 (yellow) 79% or less = 0 (red)	37.5	50
Site Level Overall	91%	55%		50	50
			Total Score	271.5	300

Overall

Quality

Overall

Completeness Score

137.5

Overall

Score

Overall %

Rating

91%

Sample TMF Health Scorecard: Results

Timeliness Score (Max 90)

Quality Score (Max 150)

Quality Score (Max 300)

Overall Score (Max 300)

Overall % Rating

Overall % Rating

Sample Slide Shared With Study Teams

TMF Health Summary

Timeliness

Goal: Submit documents within 60 days of finalization 75% to 100 % = green 60% to 74% = yellow 59% or less = red

74% of documents were submitted on

70 Average days for submission



Quality Issues

Resolve within 30 days of issue 0-30 days = green 31-60 days = yellow 61 or more = red

Overdue Qls: 0

- Quality Issues: 0 QC Rejected: 0
- Longest Overdue: 0 Days



Quality (In Progress)

Submit Documents to Workflow after submission: 0-30 days = green 31-60 days = yellow 61 or more = red

In Progress > 7 Days: 1

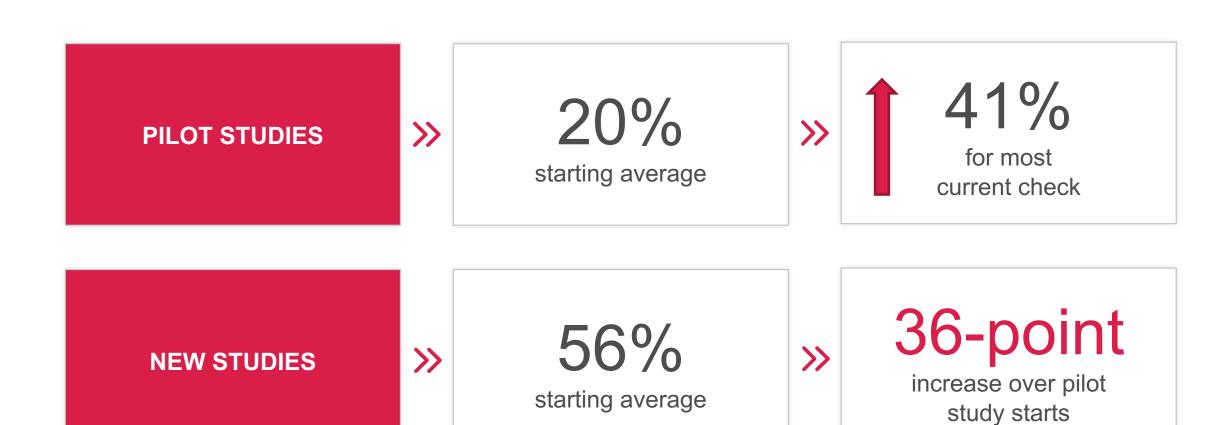
Longest In Progress: 13 Days



Give study managers an overview plus a detailed view of areas for improvement

Where We Are Now

Results: Significantly Improved TMF Health Scores



Lessons Learned: How to Leverage TMF Health Scores

1

Centralize documents in primary eTMF

2

Balance between achievable and meaningful scoring

3

Encourage study teams to be hands on with TMF

4

Collaborative, not punitive, approach

Applications for Small Biopharma: Risk-Based Approach is Scalable

1

Start with classification tiering to provide study teams with guidance on areas of focus

2

Make dashboards and reports available to study teams, even if you don't have a compliance manager role The risk-based tiering framework and dashboards focus the effort and reduce risk

Where We're Going

Next Steps in Refining Risk-Based Approach

Plan to:

1

Create a central dashboard for all studies and scores

2

Aim for studies to reach 90% threshold in consecutive checks to move to bi-annual TMF health checks

3

Use the TMF health score as a study team's objective

Questions?

Key Takeaways

1

A risk-based approach improves TMF health

2

Study teams' buy-in is central to success

3

A risk-based approach is cultural