From: OC GCP Questions
To: [redacted]
Subject: pregnancy exposure during clinical trials
Date: Monday, July 10, 2017 12:33:00 PM
Attachments: [redacted]

Good morning –

Generally the collection of data related to the pregnancy is part of the clinical investigation would depend upon the specifics of the protocol. As is commonly the case, a complete response to your question is often dependent upon the particular details of a given protocol such as whether the protocol includes plans related to pregnancy during the study.

That said, if a pregnancy has been identified during a clinical trial, and no specific plans for handling such a pregnancy are included in the protocol, unblinding should occur so that counseling may be offered based on whether the fetus has been exposed to the investigational drug, placebo, or control. The risks and benefits of continuing versus stopping investigational treatment can be reviewed with the pregnant woman. Pregnant women who choose to continue in the clinical trial should undergo a second informed consent process that reflects these additional risk-benefit considerations. Given that fetal exposure has already occurred, women who become pregnant while enrolled in a clinical trial should be allowed to continue on the investigational drug if the potential benefits of continued treatment for the woman outweigh the risks of ongoing fetal exposure to the investigational drug, of discontinuing maternal therapy, and/or of exposing the fetus to additional drugs if placed on an alternative therapy. In the situation where the decision is for the pregnant woman to continue in the trial, FDA would consider all subsequent collection of data related to the pregnancy as part of the clinical investigation. Whereas, if the decision is for the pregnant woman to discontinue participating in the trial, FDA would not consider subsequent collection of data related to the pregnancy, and the resulting child, as part of the clinical investigation; however, the Agency expects that any safety information that might be obtained regarding the pregnancy or the child that results from the pregnancy would be reported to FDA by the study sponsor as part of important safety surveillance activity.

In keeping with ICH E8, FDA would expect sites to report the pregnancy of a female subject to the sponsor, the IRB/EC, and FDA. In the past, we have recommended that the female subject receive counseling (particularly if there is any information about the risks to the fetus, or if there is NO information about fetal exposure or information that can be derived from animal studies, ensuring that she is aware of that). If the female subject chooses to continue the pregnancy, then FDA routinely recommends that she be asked to allow the investigator to follow her pregnancy to term (or longer if possible for developmental sequelae), so that any important safety information could be obtained. If you want to read the ICH E8 guidance in its entirety, here is the link: (www.ich.org/fileadmin/Public_Web_Site/ICH_Products/Guidelines/Efficacy/E8/Step4/E8_Guideline.pdf)

Additionally please see the guidance link below that discusses evaluating the risks of drug exposure in human pregnancies.

www.fda.gov/downloads/ScienceResearch/SpecialTopics/WomensHealthResearch/UCM133359.pdf

You may wish to consult CDER's Maternal Health Staff.

Pediatric and Maternal Health Staff

Office of New Drugs

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Kind regards,

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Office of Good Clinical Practice
Office of the Commissioner, FDA

From: [redacted]
Sent: Monday, July 10, 2017 9:32 AM
To: OC GCP Questions
Subject: pregnancy exposure during clinical trials

Good morning,

Does FDA require notification to the agency, when a woman becomes pregnant during a clinical trial.
Where the clinical trial had excluded such, and that the woman was removed from drug as soon as the PI became aware of the pregnancy.

Is there an FDA safety reporting requirement to notify the agency for this exposure?

Thank you for your time.
Best regards,
[redacted]