

# Why Women of Color are Needed in Clinical Trials

Renée Y. Carter, MD

Senior Fellow and Medical Advisor for the National Research  
Center for Women & Families  
Washington, DC



11/22/2007

APHA- Session: The FDA and Women's Health: Are the  
Safeguards Adequate?

# Disparities: Diseases

- In 2003, African-American women were 36% more likely to die from breast cancer, compared to non-Hispanic white women
- In 2003, Hispanic women were 2.2 times as likely as non-Hispanic white women to be diagnosed with cervical cancer
- In 2002, Hispanic women were 1.6 times as likely to have started treatment for end-stage renal disease related to diabetes as compared to non-Hispanic white women
- African-American females were 1.4 times as likely to die from heart disease as non-Hispanic white women

<http://www.omhrc.gov/templates/browse.aspx?lvl=1&lvlID=5>

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Disparities: Drug reactions

- In treating tuberculosis, Chinese and Japanese metabolize Isoniazid faster, compared to whites
- In treating congestive heart failure, Angiotensin-converting enzyme inhibitors alone are not as effective among African Americans
- Many Asians may have a weaker response to antidepressants
- In treating Alzheimer's disease, Tacrine is less effective in African Americans and Africans

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# History



11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Experimentation During Slavery



Byrd WM and Clayton L. An American Health Dilemma. Vol 1. Routledge:New York. 2000: 276

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?

# The Tuskegee Study of Untreated Syphilis

[http://www.brown.edu/Courses/Bio\\_160/Projects2000/Ethics/TUSKEGEESYPHILISSTUDY.html](http://www.brown.edu/Courses/Bio_160/Projects2000/Ethics/TUSKEGEESYPHILISSTUDY.html)

- Sponsored by the US Public Health System
- 40 year study with unknowing subjects
- Stopped only after public outcry



11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?

# Ethical Beginnings



*“And what, prithee, thinks our Royal Ethics Commissioner of our little plan?”*

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?

# The Nuremberg Code

- The voluntary consent of the individual is absolutely essential
- The experiment should be conducted in a way to avoid all unnecessary physical and mental suffering
- The degree of risk to be taken should never exceed the determined humanitarian importance of the problem to be solved by the experiment
- During the course of the experiment, the scientist in charge should be prepared to terminate the study...that a continuation of the experiment will likely result in injury, disability, or death of the subject



Hanuske-Abel, Hartmut M. "Not a Slippery Slope or Sudden Subversion: German Medicine and National Socialism in 1933." *BMJ British Medical Journal* 313(7070): 1453-1463. 7 December 1996.



# The Belmont Report

1. Respect of Persons
2. Beneficence
3. Justice

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# 45 CFR 46

- Regulations issued by DHHS
- Effective 1991
- Apply instruction and guidance for the protection of human research subjects
- Governs Institutional Review Boards (IRB)

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Institutional Review Board (IRB)

- Regulated by the Office for Human Research Protections (OHRP)
- Primary responsibility is to protect the rights and welfare of humans who are the subjects of research
- Any institution that receives federal funds for research that uses human subjects
- Follow ethical principles outlined in the Belmont Report
- Diverse membership- gender, race, and cultural background

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# National Policy







11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# The National Institutes of Health (NIH)

## NIH Revitalization Act 1993

-  Ensured the inclusion of women and minorities in all phases of clinical research projects
-  Established the Offices of Research on Women's Health and Research on Minority Health
-  Pertained to Phase III trials
-  Stipulated that the NIH will not approve any proposal for clinical research funding which did not provide information on how the investigator would comply with these requirements

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



## NIH Revitalization Act 1993 (cont)

**But.... the inclusion requirement of women and minorities did not apply if it was considered inappropriate**

- With respect to the health of the subjects
- With respect to the purpose of the research (for example, women can be excluded from prostate cancer trials)
- If scientific data demonstrates no significant difference in effects on women or minorities with respect to the intervention being studied
- Other situations identified by the NIH Director

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# The Food and Drug Administration (FDA)

## FDA Modernization Act 1997

-  Fell short of mandating that racially diverse participants be included in clinical trials

## 1998 Regulation of Investigational New Drug Applications and New Drug Applications

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Centers for Disease Control and Prevention

- Include women and members of racial and ethnic groups in research
- Identify gaps in information on health disparities and encourage research to address these disparities
- Address English proficiency and cultural differences as targets for recruitment programs
- Stress that investigators form partnerships with communities which research subjects belong

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?





# Reasons Given For Not Participating In Clinical Research



11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# ...by the Potential Subject

- A lack of trust in the health care system and researchers
- Research is more for the “sake of advancing the researcher’s career”
- Not referred to participate in clinical trials by physician
- Unable to access enrollment information for active clinical research trials
- Informed consent is a way to provide legal protection to physicians- not a guarantee of the research subject’s rights

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



## ...by the Potential Investigator

- Poor people are “unlikely to keep clinic appointments”
- Illegal drugs used by research subjects may interfere with the effects of the experimental AIDS treatments
- Need greater number of women or minority subjects for a reliable study
- Not safe to use women at childbearing age

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Reasons Women of Color are Needed In Clinical Trials

- Avoid selection bias and strengthen reliability of the clinical study
- Increase the ability to generalize research results
- Decrease, and eventually eliminate, health disparities
- Identify positive and negative effects of treatment that are particular in communities of color
- Ethical abuses in human research are less common today

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Recommendations To Increase Participation

- Require the FDA to include diversity in clinical trials and in sufficient numbers
- The subject and family members should be reminded that all stages of the study are voluntary and that they can withdraw at any time
- Honest and respectful communication between research personnel and subject
- Assurance that the subject has full knowledge of the procedures and outcomes of the study

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Recommendations To Increase Participation (cont)

- Training research staff in the cultural nuances of communities of color
- Over-recruiting of women of color to meet study goals
- Have minorities on the research team and in leadership positions
- Encourage physicians to refer their patients for inclusion in clinical research trials
- Involve lay leaders from communities of color in local IRB activities

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# Thank You!!



11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?



# References

- Byrd WM, Clayton L. *An American Health Dilemma*. Vol 1. Routledge:New York. 2000.
- British Medical Journal. <http://www.cirp.org/library/ethics/nuremberg/>.
- National Institutes of Health. *Regulations and Ethical Guidelines*.  
<http://www.nihtraining.com/ohsr/site/guidelines/belmont.html>
- Bustillos D. Surveying the Policy Landscape for Eliminating Disparities in Clinical Trials.  
[http://www.bcm.edu/edict/PDF/Policy\\_Landscape.pdf](http://www.bcm.edu/edict/PDF/Policy_Landscape.pdf).  
<http://orwh.od.nih.gov/inclusion/revitalization.pdf>.
- Wechsler J. Sex and Race in Clinical Trials. *Applied Clinical Trials*. August 2004.
- Baird KL. The New NIH and FDA Medical Research Policies: Targeting Gender, Promoting Justice. *Journal of Health Politics, Policy and Law*. 1999 24(3)540.
- Food and Drug Administration Modernization Act of 1997.  
<http://www.fda.gov/CDER/guidance/105115.htm#SEC.%20115>.
- CDC. Inclusion of Women and Racial and Ethnic Minorities in Research.  
<http://www.cdc.gov/od/foia/policies/indusio.pdf>.
- Branson RD et al. African American's participation in clinical research: importance, barriers, and solutions. *The American Journal of Surgery*. 2007. 193:32-39.
- Kolata G. In Medical Research Equal Opportunity Doesn't Always Apply. *The New York Times*. March 10, 1991.
- Smith YR et al. Perceptions of Clinical Research Participation among African American Women. *Journal of Women's Health*. 2007. 16(3): 423-427.
- Sullivan PS et al. Enrollment of Racial/Ethnic Minorities and Women with HIV in Clinical Research Studies of HIV Medicines. *Journal of the National Medical Association*. 2007.

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?





# References

- Burroughs VJ et al. Racial and Ethnic Differences in Response to Medicines: Towards Individualized Pharmaceutical Treatment. *Journal of the National Medical Association*. 2002. 94: (Supp)10:1-26.
- Durand JB. Heart Failure Management in African Americans: Meeting the Challenge. *The Journal of Clinical Hypertension* 6 (s4), 42–47.
- Lin KM. Biological differences in depression and anxiety across races and ethnic groups. *Journal of Clinical Psychiatry*. 2001.62: (Suppl) 13 :13-19
- Byrd WM, Clayton L. An American Health Dilemma. Vol 1. Routledge:New York. 2000.  
<http://www.nihtraining.com/ohsr/site/guidelines/belmont.html>
- Bustillos D. Surveying the Policy Landscape for Eliminating Disparities in Clinical Trials.  
[http://www.bcm.edu/edict/PDF/Policy\\_Landscape.pdf](http://www.bcm.edu/edict/PDF/Policy_Landscape.pdf).  
<http://orwh.od.nih.gov/inclusion/revitalization.pdf>.
- Wechsler J. Sex and Race in Clinical Trials. *Applied Clinical Trials*. August 2004.
- Baird KL. The New NIH and FDA Medical Research Policies: Targeting Gender, Promoting Justice. *Journal of Health Politics, Policy and Law*. 1999 24(3)540.
- Food and Drug Administration Modernization Act of 1997.  
<http://www.fda.gov/CDER/guidance/105115.htm#SEC.%20115>.
- CDC. Inclusion of Women and Racial and Ethnic Minorities in Research.  
<http://www.cdc.gov/od/foia/policies/indusio.pdf>.
- Branson RD et al. African American's participation in clinical research: importance, barriers, and solutions. *The American Journal of Surgery*. 2007. 193:32-39.
- Kolata G. In Medical Research Equal Opportunity Doesn't Always Apply. *The New York Times*. March 10, 1991.
- Smith YR et al. Perceptions of Clinical Research Participation among African American Women. *Journal of Women's Health*. 2007. 16(3): 423-427.
- Sullivan PS et al. Enrollment of Racial/Ethnic Minorities and Women with HIV in Clinical Research Studies of HIV Medicines. *Journal of the National Medical Association*. 2007.

11/22/2007

APHA- Session: The FDA and Women's Health: Are the Safeguards Adequate?

