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1 **The need for ethical guidance for the use of Patient-Reported Outcomes (PROs) in**
2 **research and clinical practice**

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30 **To the Editor** - Patient-reported outcomes (PROs) are increasingly used in clinical research to
31 provide evidence of the benefits and risk of therapy from a patient perspective. PRO data from
32 clinical trials can inform regulatory approvals and drug labelling, clinical guideline development
33 and health policy.¹ Approximately one third of clinical trials include PROs collected using patient
34 questionnaires.² Beyond trials, PRO data is also increasing capture in observational research
35 and routine clinical care to provide information on the burden of disease, real-world evidence of
36 treatment safety and effectiveness,³ for audit and benchmarking,¹ and to monitor patient status
37 and provide timely care tailored to individual needs. For instance, a recent study demonstrated
38 that systematic web-based collection of symptoms led to improved health-related quality of life
39 (HRQL), survival, quality-adjusted survival, and reduced emergency room (ER) visits and
40 hospitalisation, among patients receiving chemotherapy for advanced solid tumours.⁴ Patients
41 value PRO trial results as they can enhance clinician-patient communication regarding
42 treatment options, helping patients to feel more empowered in shared decision-making around
43 their care.⁵

44
45 Despite the benefits of incorporating PROs in research and routine practice several ethical
46 challenges can hinder the uptake and benefit to patients of PRO data. The PRO content of trial
47 protocols and reporting of PRO results are often suboptimal; missing data rates are high, and
48 delay of PRO data publications are predominant. A recent study evaluating 228 NIHR (National
49 Institute of Health Research) Cancer portfolio studies demonstrated that 50,000 patients were
50 involved in studies that failed to publish the PRO data collected, which is considered to be
51 unethical.⁶

52 PRO data collection is associated with a number of ethical considerations which must be
53 addressed. An ethical consideration is defined as one that requires a choice based on moral
54 considerations drawing on established principles, theories and values, which might have
55 implications on the individuals or society's welfare. The differing use of PROs in research and
56 routine care settings, and review/use of data by clinical teams, may lead to uncertainties for
57 patients about why data is being collected and data privacy - how their data is being viewed and
58 used. Research indicates that in some instances PRO measures may not reflect the
59 perspectives of vulnerable groups or older people challenging bioethical principles and
60 threatening the scientific validity of results.⁷ Patient burden associated with completing multiple
61 questionnaires is also a concern. Of particular note is the lack of guidance surrounding how staff
62 should manage situations where PRO data reveal “concerning” levels of psychological distress

63 or physical symptoms that may require an immediate response.⁸ Evidence suggests research
64 staff are handling such data inconsistently, which may lead to inequitable patient care, co-
65 intervention bias and confusion.

66 Furthermore, PROs could be used for long-term follow-up to assess the impact of the severe
67 acute respiratory syndrome coronavirus 2 (SARS-CoV-2) on patients' quality of life and alert the
68 clinician of potential life threatening symptoms.⁹ The increased use of telehealth will also influence
69 the increased use of PRO data to monitor patients' symptoms. Therefore, there is a need to
70 ensure that this is done in an ethical way that protects patient safety and data.

71
72 To address these challenges, the PRO Ethics Steering Group comprised of PRO
73 methodologists, patient partners and ethicists and is developing international, consensus-based
74 guidelines for use by researchers and patient partners in preparing ethics submissions and for
75 use by Research Ethics Committees and Institutional Review Boards in the assessment of PRO
76 research. The guidelines will focus specifically on ethical considerations of PRO research and
77 data collection in clinical practice, using the EQUATOR (Enhancing Quality and Transparency of
78 Health Research) Network methodological guideline development.¹⁰ The development process
79 will include a literature review, modified Delphi exercise and international consensus meeting
80 involving members of Research Ethics Committees, experts in research ethics, patient partners,
81 trialists and PRO researchers. Given the dearth of guidance currently available, we plan to hold
82 the Delphi exercise and consensus meeting with a view to publishing the guideline in 2021.

83
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85 SCR and MJC conceived the idea. SCR developed the first draft. All authors made substantial
86 revisions, and approved the final manuscript.

87
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