

# Awareness Is **Not** Readiness

## *Building AI-Ready Clinical Development Systems*

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*Awareness is a starting point. Readiness is an operating capability.*

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# The Two Questions

01

**What does  
readiness actually  
look like?**



02

**Where is  
your readiness  
gap?**



# The Gap Nobody Budgeted For



## AWARENESS

Knowing what must change

An AI strategy deck

"AI will transform trials" — someday

Interest and pilots



## READINESS

The capability to execute the change

An operating model that runs

Trials redesigned to be AI-ready — now

Enterprise execution — not experiments

*AI cannot run on a workflow that was never designed for it*

# When AI Meets an Unready Workflow

*The most-cited AI failures were not just model failures. They were workflow, data, and governance failures.*

1



## Watson for Oncology

MD Anderson, 2013–2017

~\$62M spent; system never reached clinical use.

**Workflow gap: No interoperable data layer**

2



## Epic Sepsis Model

External validation, 2021

Sensitivity 33%; missed two-thirds of sepsis cases.

**Workflow gap: Signals not pre-specified at the source**

3



## Industry Reality

Biopharma AI, 2025

89% of AI pilots do not scale; 96% report their data is not AI-ready.

**Workflow gap: Operating model beneath AI is not real**

*None of these are AI failures. All three are readiness failures.*

Source:

- MD Anderson–Watson: [Becker's summary of UT System audit](#) · [AIAAIC incident record with primary-source links](#)
- Epic Sepsis Model: [Wong et al., JAMA Internal Medicine, June 2021](#) · [editorial, Habib et al., JAMA Internal Medicine](#)
- Pilot scaling: [Discover Pharma survey of 116 life-sciences data leaders](#) · [IntuitionLabs review citing McKinsey life-sciences survey](#)

THE REGULATORY DIRECTION IS SET.

# The Standards Already Moved

*Three frameworks. One direction: structured, data-oriented clinical development.*



## ICH E6(R<sub>3</sub>)

### Good Clinical Practice

Quality and risk built in by design.

*Effective EU Jul 2025 · FDA guidance Sep 2025 · Annex 2 Jun 2026*



## ICH M11 (CeSHarP)

### Clinical Protocol

Structured, harmonized protocol content.

*Adopted Step 4 · Nov 2025*



## FDA Real-Time Review

### Oncology / RTOR

Continuous, data-oriented oversight.

*Active review pathway*

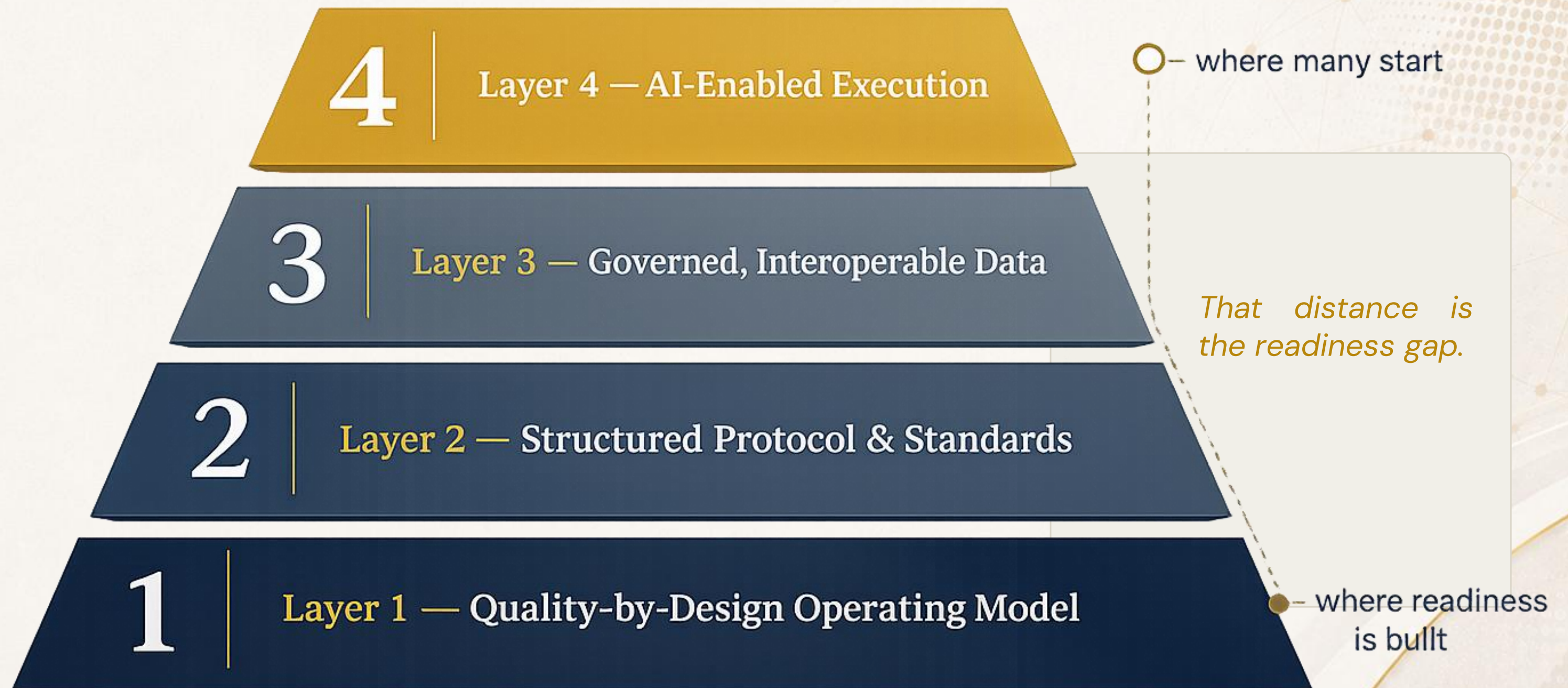
**One direction: structured, data-oriented operating models**

*This is not a technology gap. It is a readiness gap.*

Source: [EMA](#), [FDA E6\(R3\)](#), [ICH M11](#)

# The Clinical Development Readiness Stack

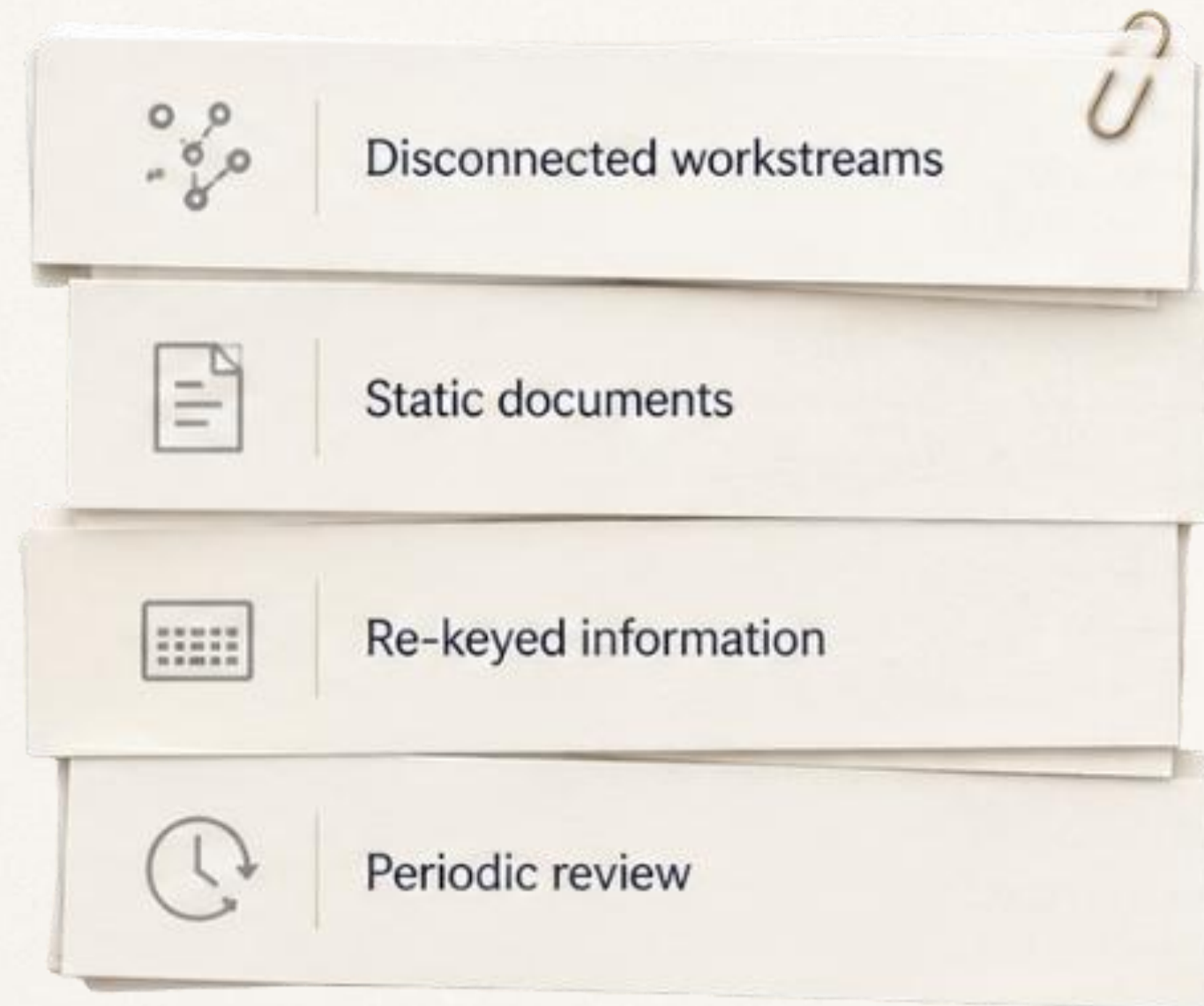
*Each layer enables the one above it. Most organizations reach for Layer 4 on a Layer 1 foundation.*



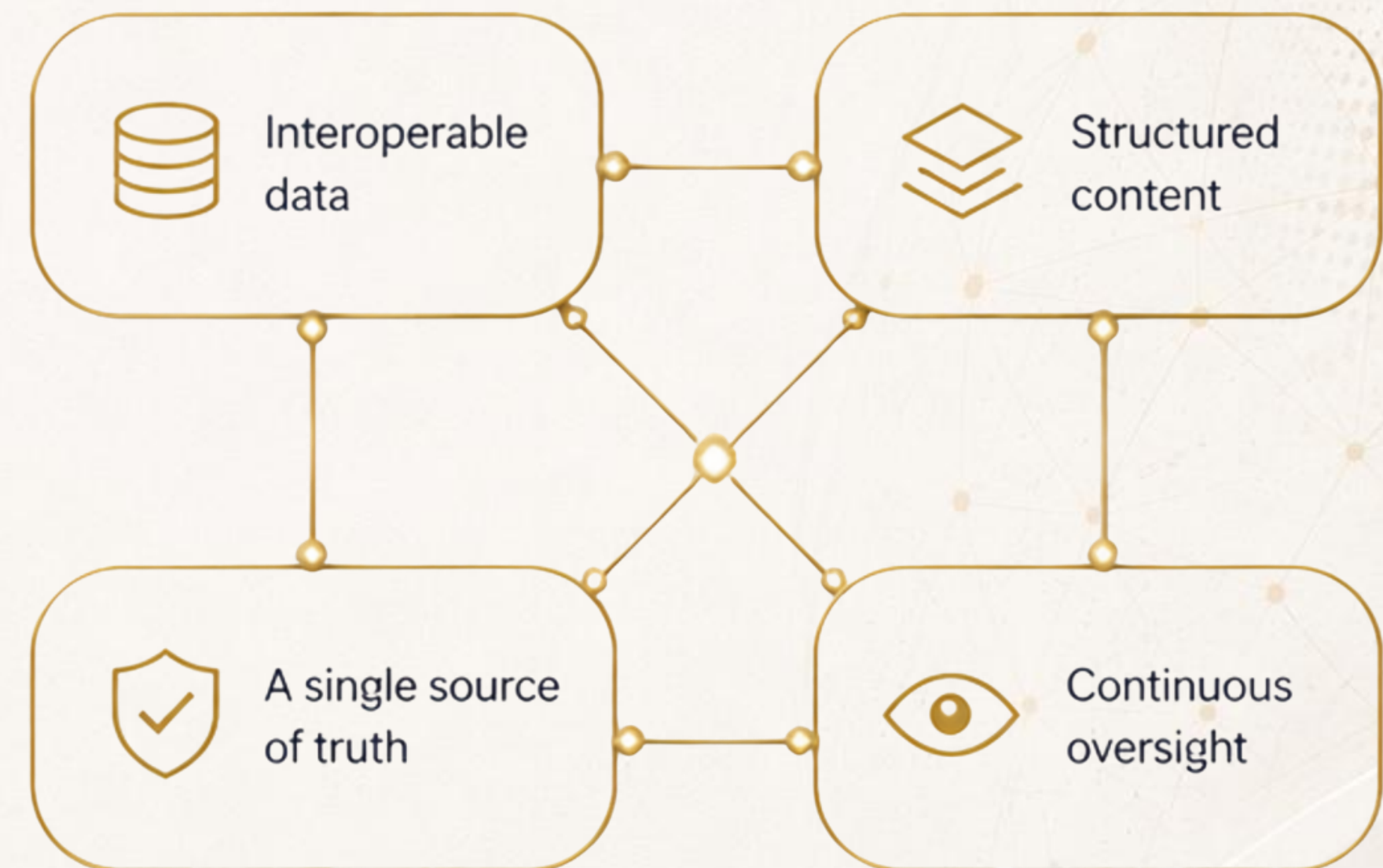
*Your readiness is defined by your weakest foundational layer.*

# The Unit of Work **Has Changed**

## Document-Driven (Legacy)



## Data-Oriented (AI-Ready)



*AI operates on structured data — not on PDFs.*

# The Protocol Becomes **the Operating Asset**

*Stop running five workstreams. Run one model.*



From: protocol → documents → manual interpretation → five disconnected workstreams

To: structured protocol → connected data → automated workflows → one coherent operating model

# The Shift, Row by Row

| WORKSTREAM                  |  LEGACY STATE |  AI-READY STATE |  ENABLING STANDARD / ASSET |
|-----------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <b>1</b> Protocol authoring | Word template;<br>PDF final                                                                    | <b>Machine-readable</b><br>digital protocol;<br>single source of truth                             | ICH M11<br>+ CDISC USDM v4                                                                                    |
| <b>2</b> Amendments         | Redlines;<br>manual downstream<br>propagation                                                  | <b>Structured diff;</b><br>systems reconfigure<br>from the model                                   | USDM versioning<br>+ HL7 Vulcan UDP                                                                           |
| <b>3</b> Site selection     | Spreadsheets,<br>relationships, gut                                                            | <b>Fit-for-purpose</b><br>RWD cohort feasibility                                                   | ICH E8(R1) CTQ<br>+ RWD frameworks                                                                            |
| <b>4</b> Data capture       | eCRF re-keyed<br>from source;<br>late cleaning                                                 | <b>Pre-specified</b><br>edit checks;<br>computable eligibility                                     | CDISC CDASH<br>+ Dataset-JSON                                                                                 |
| <b>5</b> Monitoring         | 100% SDV on<br>scheduled visits                                                                | <b>Signal-driven</b><br>KRI/QTL review                                                             | ICH E6(R3) Annex 1<br>RBQM                                                                                    |
| <b>6</b> Safety review      | Periodic aggregate<br>review; narrative<br>drafting                                            | <b>Continuous</b><br>signal detection<br>under human sign-off                                      | E2B(R3)<br>+ pre-specified thresholds                                                                         |
| <b>7</b> TMF                | Repository;<br>inspection-driven<br>checks                                                     | <b>Event-driven</b><br>metadata connected<br>to protocol                                           | TMF terminology /<br>integration                                                                              |
| <b>8</b> Submission         | eCTD assembly<br>from parallel<br>streams                                                      | <b>Re-use</b><br>from digital protocol<br>and analysis results                                     | FDA RTOR + PMDA<br>eCTD / e-study data                                                                        |

# Why Governance Matters More, Not Less

*Data governance is designed in, not bolted on — the right data, generated, structured, connected, and traceable from the beginning.*



**Data integrity by design** — embedded at the source, not validated after the fact



**Signal pre-specification** — define what you're looking for before you look



**Human oversight** — AI surfaces patterns; people decide what matters  
Calibrated by risk: human-in-the-loop, on-the-loop, or in-command (EU Trustworthy-AI)

*Earlier access to accumulating data does not reduce the need for governance. It raises it.*

# Lessons From Building It

*Drawn from NSF and Amarex's collaboration with Microsoft, applying Azure AI to clinical operations.*

1

**Readiness precedes technology**

The operating model must be ready before AI can be effective.

2

**Governance is the foundation, not the finish**

Governance designed at the start outperforms what is bolted on later.

3

**The operating model decides the outcome**

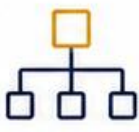
The algorithm amplifies what already exists — it does not create it.

*A successful pilot is not an enterprise capability.  
Build for production, not proof of concept.*



# Where Are You — Honestly?

*Readiness is not where you aspire to be. It's the lowest layer you can actually operate.*

| Readiness question                                      |  Aware                    |  Building                     |  Ready                                    |
|---------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|
| <b>L1</b> Is quality designed in, or inspected in?      | <br>QbD in SOPs           | <br>CTQs defined per protocol | <br>CTQs drive monitoring & IDMC triggers |
| <b>L2</b> Is the protocol an asset, or a document?      | <br>Word/PDF template    | <br>M11 fields mapped        | <br>USDM object feeds downstream         |
| <b>L3</b> Is your data interoperable and pre-specified? | <br>Data lake exists    | <br>Lineage for key assets  | <br>Source-to-submission traceable      |
| <b>L4</b> Can oversight run on live data?               | <br>AI pilots discussed | <br>1–2 governed use cases  | <br>Production use cases with ROI       |



Download the 4-Layer AI Readiness Scorecard

# Build Before You Buy

1

## Build the foundation

Start at Layer 1 — quality-by-design is the prerequisite, not the option.

2

## Close the gap

Assess honestly; the readiness gap is an operating-model problem, not a technology one.

3

## Modernize one trial at a time

Design operating models, not isolated workflows. Govern before you automate.

*The question is not whether clinical development becomes AI-ready — it is whether your organization leads or follows.*

AI is **not** something  
you **buy**.

It is a capability you  
**build**.

Questions & Discussion

# Thank you

Let's build readiness—not just awareness.

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Let's continue the conversation:

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