Basics of Navigating Clinicaltrials.gov

Terry Sousa
UMass Medical School
PRS Administrator for Clinicaltrials.gov

What is ClinicalTrials.gov?

- National registry of federally and privately supported research studies

Why register and report results?

- Because it's the law
- Federally mandated
- Required by FDA for IND/IDE trials (Form 3674)
- Promotes transparency to the public about clinical trials
- Beneficial to the research community
  - Assists in enrollment
  - Upholds research integrity by tracking protocol changes
- The NIH proposed a policy to ensure that every clinical trial that receives NIH dollars is registered on ClinicalTrials.gov.

And another reason…

- **The International Committee of Medical Journal Editors (ICMJE)**
  - Established a requirement that all clinical trials be entered in a public registry as a condition of consideration for publication

When do I register?

- When to register
  - FDAAA 801: No later than 21 days after the first participant is enrolled
  - ICMJE: before the first participant is enrolled

Which studies do I register?

- Applicable Clinical Trials
  - Interventional studies of drugs, biologics & devices
  - Not Phase 1 (drugs/biologics), not small feasibility (devices)
  - US FDA jurisdiction (e.g., IND/IDE or US site)
  - Applicable clinical trials initiated on or after 9/27/07 or if initiated after 09/27/07, “ongoing” as of 12/26/07

Penalties for not registering

- FDAAA Enforcement Provisions
  - Public notices of noncompliance
  - Civil monetary penalties (up to $10,000 per day)
  - Withholding of NIH and other federal grant funds

Who is required to register and submit results?

- NOT Terry Sousa!
- Responsible Party
  - Sponsor [Industry, agency or investigator initiated]
  - Sponsor may designate the Principal Investigator (PI) [only one per trial]
  - Principal Investigator may designate a staff member to do the data entry

Applying for an account

- Send an email to: teresa.sousa@umassmed.edu
- Organizational account for UMass Medical School. An account must be created in order to access PRS
  - Individual accounts are linked to the "*UMass*" account
  - Only PRS Administrators can create user accounts
  - Applicant must provide current email address and phone
- Accounts can be modified and deactivated
  - Contact information should be updated on a regular basis
  - Passwords can be reset by the PRS Administrators
  - If PI's leave, I need to know.

Steps for Registering a Clinical Study

- Login to PRS
- Enter the required and optional data elements
- Preview, inspect, and release (submit) the record. (only the responsible party can release the record)
- NCT number will be assigned (National Clinical Trial identifier)
  - Centers for Medicare & Medicaid Services (CMS) requires clinical trial number on claims associated with clinical trial participation.
- Responsible Parties should update their records within 30 days of a change to any of the following:
  - Recruitment status and overall recruitment status data elements on ClinicalTrials.gov
  - Completion Date
  - Other changes or updates to the record must be made at least every 12 months
  - Record Verification Date must be updated at least every 6 months for studies that are not yet completed, even if there were no changes to the record

Record Review Criteria

- Clinicaltrials.gov QA Review consists:
  - Apparent validity
  - Meaningful entries
  - Logic and internal consistency
  - Formatting, spelling
  - Acronym definitions
- Quality Assurance Review
  - Final review by ClinicalTrials.gov QA team
- Time frame for review
  - Protocol records generally take 2 to 5 business days
  - Results records can take up to 30 days, depending on the complexity of results

How to update the record

- At any time, you can make updates and edits to a record published on ClinicalTrials.gov by..
  - Logging to PRS
  - Click on **Edit Record** under the Protocol Records heading on the PRS main menu page
  - After you finish making changes, you will need to release (submit) the record to ClinicalTrials.gov for review and processing

View Earlier Versions of Your Study Record

- The most recent version of a study record is displayed on ClinicalTrials.gov
- A history of changes made to a study record is available on the ClinicalTrials.gov archive site.
- You will need the ClinicalTrials.gov identifier (NCT number) for the record in order to view its history.
- You can also click on the **History of Changes** link at the top of a study record to see its earlier, archived versions

When to report results?

- When to Report Results? Within 12 months of Primary Completion Date (final data collection for primary outcome(s)).
  - the date that the final subject was examined or received an intervention for the purposes of final collection of data for the primary outcome, whether the clinical trial concluded according to the prespecified protocol or was terminated.
- If product is not approved by Primary Completion Date but approved later, then results due 30 days after approval.
  - Delays are possible under limited circumstances. **Pending publication is NOT considered a good cause for delay**

When to report results? Cont'd

- Publishing? If you think you can publish within the timeframe, best to prepare both at the same time. Otherwise, post results first, then publish, then update the results in CT.gov so they align.

NIH Results Reporting

- NIH *encourages* results reporting for all NIH supported clinical trials registered in ClinicalTrials.gov, regardless of whether or not they are required to do so under FDAAA.

Non applicable trials results reporting

- Trials not subject to FDAAA are not required to report results. In order to clarify in the database that the trial is not subject to FDAAA, go to the trial's registration record and answer "No" to the data element (field) "Section 801 Clinical Trial?". Answering "no" documents that the trial is not subject to FDAAA and not out of compliance.

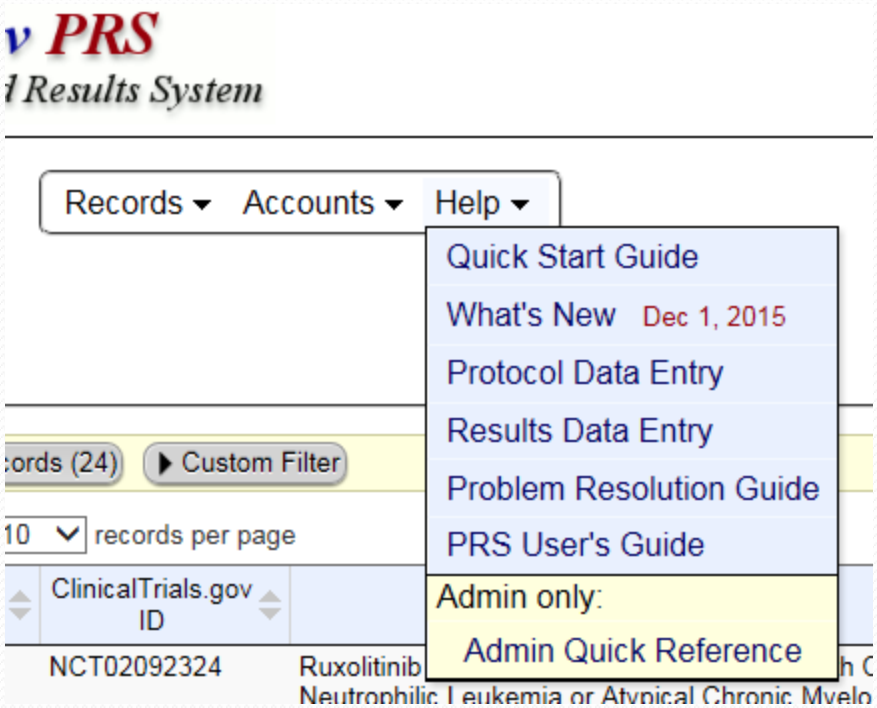
Preparing for Results Reporting

- Who enters results? You! But you can get help.
- The more accurate, error-free, descriptive and clear your arms/outcomes are in the initial registration, the easier it will be for results reporting
- An individual familiar with the study design and data analysis (such as the clinical investigator or study statistician) should be involved in order to accurately summarize the results information.

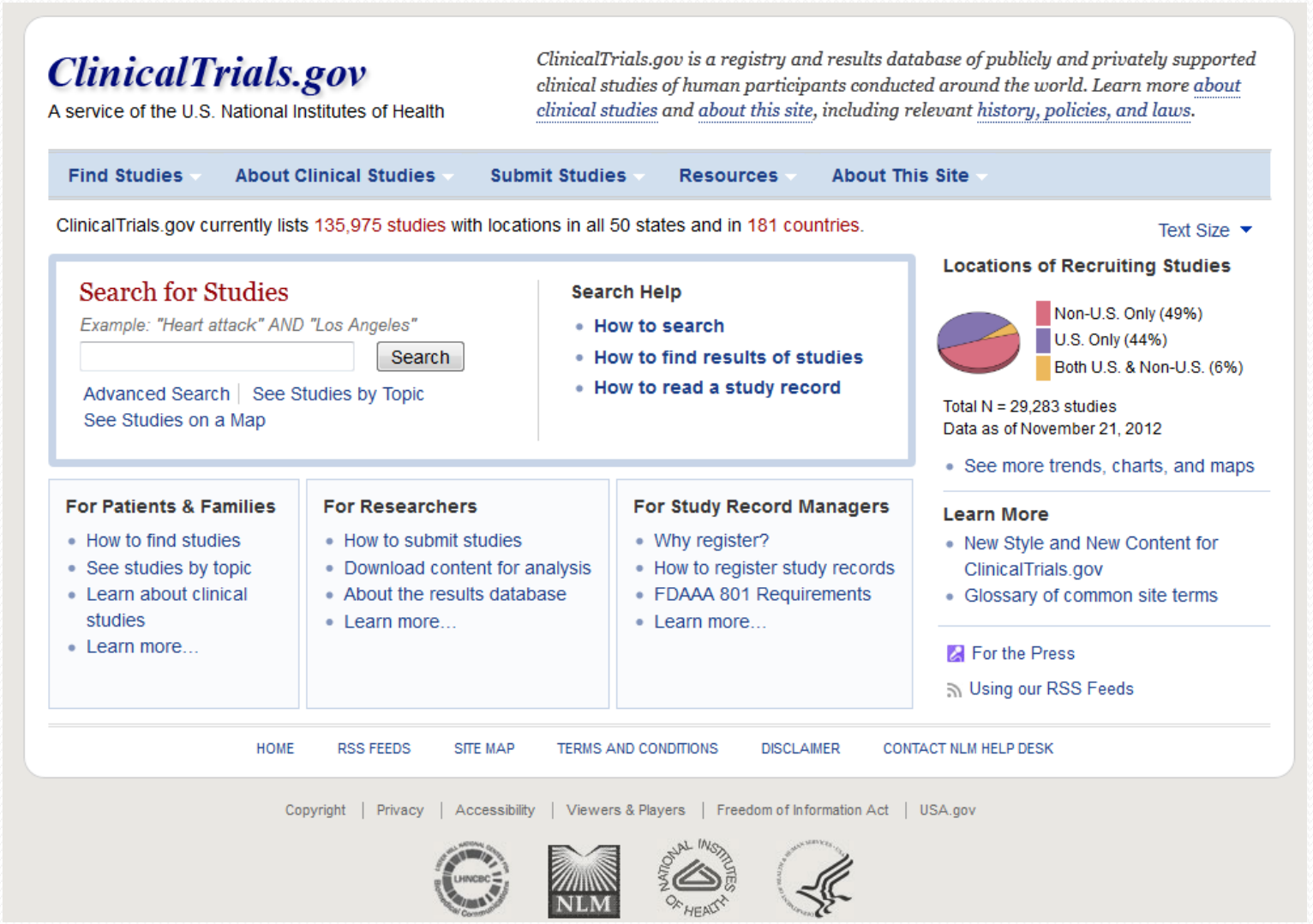
Useful links

- First Time? – Check out these links:
- **How to submit results:** https://clinicaltrials.gov/ct2/manage-recs/how-report
- **Basic Results Data Element Definitions**: https://register.clinicaltrials.gov/prs/html/results_definitions.html
- **PRS User Guide**: Located on the Help menu dropdown, after login
- **Results Data Entry** section on Help Menu dropdown
- **Webinars and additional training**: https://clinicaltrials.gov/ct2/manage-recs/present#ResultsPresentation

- Continue to check for Changes: See **What's New** on the Help Menu dropdown.



Getting Logged in



SUBMIT STUDIES

Why Should I Register and Submit Results?
FDAAA 801 Requirements
How to Apply for an Account
How to Register Your Study
How to Edit Your Study Record
How to Submit Your Results
Frequently Asked Questions
Support Materials
Online Presentations

Related Pages
- Protocol Registration System (PRS)

Do you want to participate in a clinical study? See information for patients and families.

Submit Studies

ClinicalTrials.gov allows the registration of clinical studies with human subjects that conform to:

- Any applicable human subject or ethics review regulations (or equivalent) and
- Any applicable regulations of the national or regional health authority (or equivalent)

New to registering studies? See For Study Record Managers.

Why Should I Register and Submit Results?

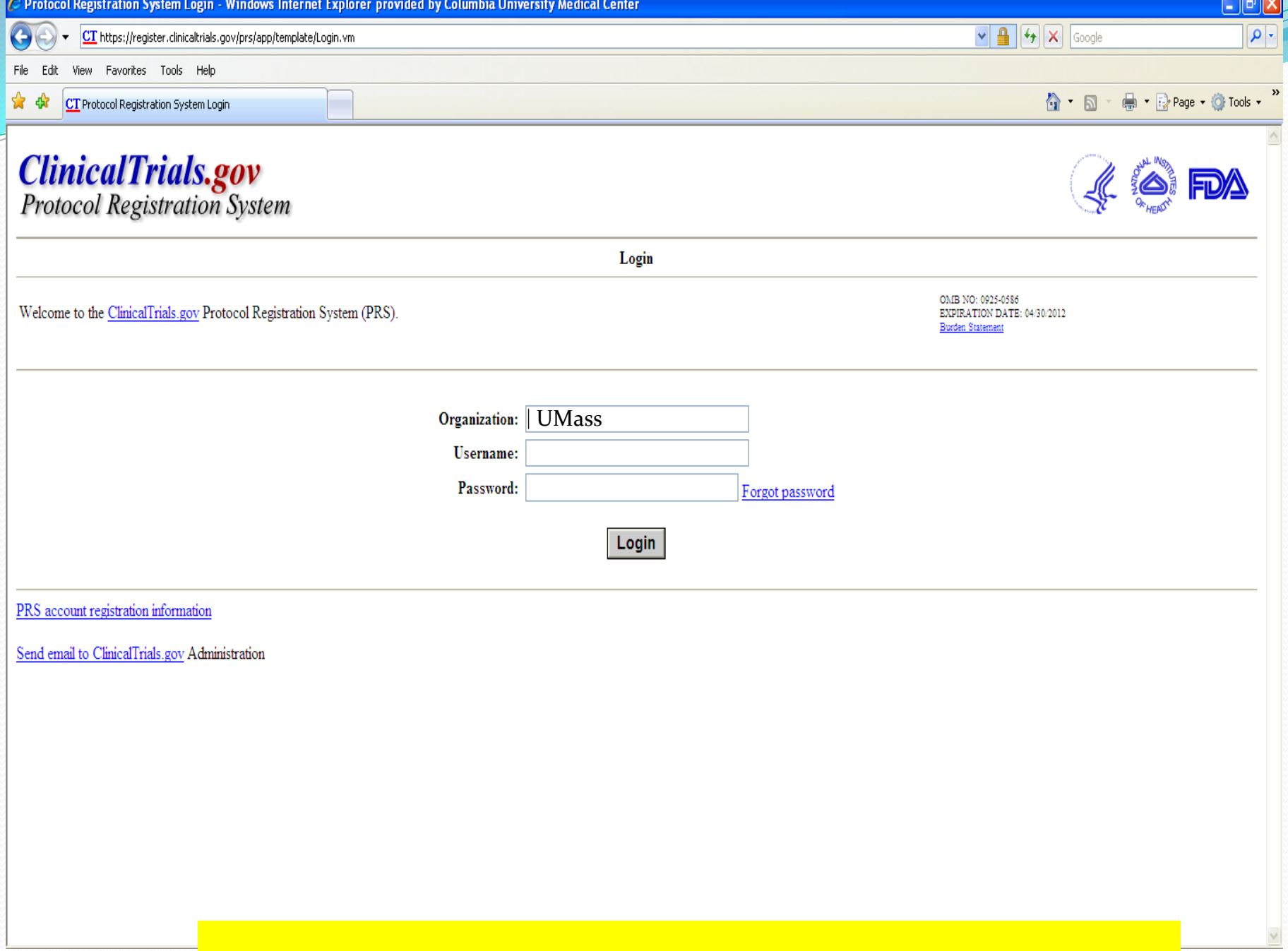
Learn about the purpose of study registration and results submission. Includes an overview of applicable laws and policies.

FDAAA 801 Requirements

Learn about Section 801 of the Food and Drug Administration Amendments Act and the basic requirements for registering clinical trials and submitting summary results, including information about the Responsible Party, Applicable Clinical Trials, deadlines, and penalties.

How to Apply for an Account

Learn how to apply for an account to access the Protocol Registration System (PRS), the Web-based



Website Login Address: **https://register.clinicaltrials.gov**

Example Studies for Results Data Entry

- Parallel Study Design
- Cross-over Study Design
- Dose Escalation Study Design
- Factorial Study Design
- Multiple Period Study Design

https://clinicaltrials.gov/ct2/manage-recs/present#OnlinePresentations

What results do I submit?

- **Helpful Hint:** Use the **Simple Results Templates** (On ClinicalTrials.gov, under Submit Studies, Support Materials) to organize your information before starting PRS data entry

Simple Results Templates and Examples

Scientific information is submitted as four separate modules:

- Participant Flow
- Baseline characteristics
- Outcome measures (examples provided)
- Serious adverse events

https://prsinfo.clinicaltrials.gov/results_table_layout/ResultSimpleForms.html

Submitting Results Presentations

- Presentations developed by Clinicaltrials.gov provide an overview of each results module, including required data elements, review criteria, and examples of common errors

https://clinicaltrials.gov/ct2/manage-recs/present#ResultsPresentation

FAQ

- My study is not yet approved by a human subjects review board (ethics review committee, institutional review board). Can I register it on ClinicalTrials.gov?
  - Yes
  - Register the study as “Not Yet Recruiting”
  - When IRB approval is obtained, change status to “Recruiting”

FAQ

- Why can't I find my study on ClinicalTrials.gov
  - Did you “release” it?
  - The study might also be undergoing review
  - Updates to record take a few days to review
  - Results can take up to 30 days to review

FAQ

- When will the NCT identifier for my study be assigned?
  - Assigned after the protocol information has been Released (submitted) by the Responsible Party and passed review by ClinicalTrials.gov staff
  - The record and NCT identifier will available on ClinicalTrials.gov within 2–5 business days after it is Released

FAQ

- Can I register a study after it has started, has closed to recruitment, or has been completed?
  - Yes, you can register a study on ClinicalTrials.gov at any time.
  - Remember, to be compliant with FDAAA, the study must be registered 21 days after first subject has been enrolled and…
  - ICMJE required registration prior to enrollment of first subject

FAQ

- How do I contact ClinicalTrials.gov if I have a question about my study record?
  - register@clinicaltrials.gov
  - Provide them with the NCT identifier or unique protocol ID if the NCT has not been assigned yet

FAQ

- Does the definition of Applicable Clinical Trial under FDAAA 801 only include studies conducted under an FDA Investigational New Drug Application (IND) or Investigational Device Exemption (IDE)?
  - No
  - A clinical investigation of a drug can be an Applicable Drug Clinical Trial under FDAAA 801 even if it does not require an IND, and a clinical investigation of a device can be an Applicable Device Clinical Trial whether or not an IDE is required.

Links

- Definitions of a Applicable Clinical Trial: https://prsinfo.clinicaltrials.gov/ElaborationsOnDefinitions.pdf
- Clinical trial registration and results submission requirements: https://www.gpo.gov/fdsys/pkg/PLAW-110publ85/pdf/PLAW-110publ85.pdf#page=82
- Information for NIH Grantees: https://grants.nih.gov/ClinicalTrials_fdaaa/index.htm
- Penalties for non compliance: https://www.gpo.gov/fdsys/pkg/PLAW-110publ85/pdf/PLAW-110publ85.pdf#page=98

Let’s peruse the website

https://clinicaltrials.gov/

Questions?