Registering with Clinicaltrials.gov

On 9/16/2016, the Department of Health and Human Services (DHHS) released a Final Rule and NIH released a new policy that describe changes to their requirements for clinical trial registration and results submission.

The DHHS Final Rule describes the legal requirements for clinical trial registration and results submission and replaces the legal requirements described by Section 801 of the Food and Drug Amendments Act of 2007. Under the Final Rule:

1. Additional data elements are required for registration and results information submission. Some data elements currently optional when submitting information to the ClinicalTrials.gov Protocol Registration and Results System (PRS) will be required, and some new data elements not yet available in PRS will be required.
2. Results information is required for ALL applicable clinical trials that are required to register, not just those for which the drug, biological, or device products studied are approved. The standard deadline for results information submission is no longer than one year after the primary completion date.
3. Corrections to submitted information will be required within 15 days (for registration information) and 25 days (for results information). Responsible parties will be required to correct or address within 15 days (for registration information) and 25 days (for results information) any errors, deficiencies and /or inconsistencies that are identified during the quality control review process.

The new NIH policy is similar to the Final Rule, except that NIH now requires that all NIH-funded clinical trials register and submit results. Thus, the NIH policy now covers more types of trials, including phase 1 studies, small feasibility studies, and trials that do not involve any FDA-regulated product, such as trials involving only behavioral interventions.

The Final Rule and the new NIH policy is effective 1/18/2017.

Studies that must be registered and submit results by law are called “Applicable Clinical Trials”.

The Final Rule and FDAAA have the same definition of Applicable Clinical Trial. These trials generally include:

- Interventional Trials of Drugs and Biologics
- Interventional Trials of Devices, other than device feasibility studies
- Pediatric Post-Market Surveillance Studies

Who is Responsible for Registration and Up-Dating Clinical Trials on ClinicalTrials.gov

The entity responsible for registering is the “Responsible Party,” which has a similar function as a “sponsor”. The FDA defines the “Responsible Party” as:

1. A person who initiates a clinical investigation, but who does not actually conduct the investigation, i.e., the test article is administered or dispensed to or used involving, a subject under the immediate direction of another individual. A person other than an individual (e.g., corporation or agency) that uses one or more of its own employees to conduct a clinical investigation it has initiated is considered to be a sponsor, and the employees are considered to be investigators.
2. A sponsor-investigator is an individual who both initiates and actually conducts, alone or with others, a clinical investigation, i.e., under whose immediate direction the test article is administered or dispensed to, or used involving, a subject. The term does not include any person other than an individual, e.g., corporation or agency.

Both of these definitions of "sponsor" or "Responsible Party" refer to the person or entity who "initiates" the clinical investigation. For purposes of this definition, if a clinical trial is being conducted under an investigational new drug application (IND) or investigational device exemption (IDE), then the IND/IDE holder is considered to be the person or entity who initiated the trial and, therefore, is the sponsor (regardless of how the trial is funded). This person or entity will be the "responsible party".

The Final Rule and FDAAA have the same definition of Responsible Party. For TTUHSC PI-initiated studies, TTUHSC is designated the Responsible Party and the TTUHSC PI is responsible for registration and results submission. For industry-sponsored trials or multi-site trials, the industry sponsor or lead site is responsible for registration and results submission.

Steps for Registering a Clinical Trial at ClinicalTrials.gov

- Contact TTUHSC Protocol Registration System (PRS) Administrator to request a PRS account:
  Chadley Copeland, Research Compliance Officer
  Chadley.Copeland@ttuhsc.edu
  806-743-4752

- Receive a login name and a temporary password from ClinicalTrials.gov by email
- Access the PRS website at http://register.clinicaltrials.gov
  - "Organization" = Texastech

  Your User ID is generally your first initial immediately followed by your last name.

- Change your temporary password
- Click "New Record" on the top left corner of the main page and then follow the prompts for creating your record.
- The Principal Investigator (acting as the study sponsor) is responsible for entering trial information, ensuring that it is correct, and updating the registry in a timely manner and as required by law.
- If the overall Principal Investigator of the study is a TTUHSC faculty member, TTUHSC should be listed as the Responsible Party.
- Once you have completed all sections, click "Complete."

- The record will then be sent to the TTUHSC ClinicalTrials.gov administrator for review, approval, and release of the record to the ClinicalTrial.gov quality review team.
- The PRS Administrator will then “Approve” and “Release” the record (i.e. submit the record to ClinicalTrials.gov for review). It is important to note that this is a two-step process. Both the PRS Administrator at TTUHSC and the reviewers at ClinicalTrials.gov will often request changes to the record. The record will not be released until all the changes have been completed. It is important to allow enough time for both the PRS Administrator and ClinicalTrials.gov to review.
- Records are made available to the public through the ClinicalTrials.gov website within 2 to 5 days of release, following a review by ClinicalTrials.gov.

Results Submission Requirements

The principal investigator must post results to the record no later than one year after the study’s Primary Completion Date, which is the “date that the final subject was examined or received an intervention for the purposes of the final collection of data for the primary outcome. This occurs whether the clinical trial was concluded according to the pre-specified protocol or was terminated. Principal Investigators must complete the required fields with meaningful entries and are encouraged to complete all optional data elements where appropriate to their study. The PRS Administrator will set up a meeting with ClinicalTrial.gov analysts to assist the Principal Investigator if additional information is needed to submit results.

Registration and Publication in Medical Journals

Medical journals following the International Committee of Medical Journal Editors (ICMJE) guidelines require registration as a condition of publication. Please note that the ICMJE guidelines require registration of trials of all intervention types, including trials that do not involve any FDA-regulated product, such as trials involving only behavioral interventions. Additionally, phase 1 drug studies and device feasibility studies must be registered per the ICMJE guidelines.

Noncompliance

A breach of this policy by an investigator or research personnel providing study information to ClinicalTrials.gov may include but is not limited to:

- Research results not being provided to ClinicalTrials.gov within six months of the completion date of the study.
- Providing inaccurate or erroneous study information to ClinicalTrials.gov.
- Additional research information requested by ClinicalTrials.gov not being provided within 3 months of the request.\

A breach of the policy by the principal investigator may involve the suspension of research privileges by the PI at TTUHSC.