

**Title: Standard Operating Procedure (SOP) Clinical Trial Registration of Investigator-Initiated Trials (IITs)**

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### **1. PURPOSE**

To provide guidance to Sponsor-Investigators on the requirements and procedures for registering clinical studies.

### **2. RESPONSIBILITY AND SCOPE**

This standard applies to the following staff:

- 1) Melbourne Children’s Principal Investigators conducting investigator-initiated trials (IITs), either single-site or multi-site, referred to herein as the Sponsor-Investigator.
- 2) Representatives of the Sponsor-Investigator who have been delegated the task of registering and maintaining registration
- 3) MCRI’s designated clinicaltrials.gov PRS Administrator (currently undertaken by MCTC staff)

The procedures detailed below cover the following aspects of clinical trial registration:

- Selecting a clinical trial registry
- Requesting a PRS user account
- Creating a new record

- Updating and maintaining records
- Approving and releasing records
- Notifying stakeholders of registration
- Submitting summary results, protocol and statistical analysis plan

Note: The process outlined in this SOP for registering a clinical trial may also be used to register observational studies. i.e. the process is the same.

### 3. APPLICABILITY

#### Publication

In 2004 the International Committee of Medical Journals Editors (ICMJE, including editors of the Medical Journal of Australia, Lancet, New England Journal of Medicine and others) declared that they would not consider a trial for publication without evidence that it had been registered in a publicly accessible trials registry prior to enrolment of the first participant.

The ICMJE has stated that submission of summary results to ClinicalTrials.gov will not be considered prior publication and will thus, not interfere with journal publication.

ICMJE has adopted the WHO's definition of clinical trial: "any research study that prospectively assigns human participants or groups of humans to one or more health-related interventions to evaluate the effects on health outcomes." Health-related interventions include any intervention used to modify a biomedical or health-related outcome (for example, drugs, surgical procedures, devices, behavioural treatments, dietary interventions, and process-of-care changes). Health outcomes include any biomedical or health-related measures obtained in patients or participants, including pharmacokinetic measures and adverse events. Purely observational studies (those in which the assignment of the medical intervention is not at the discretion of the investigator) will not require registration.

SOME JOURNALS, INCLUDING THE LANCET, REQUIRE PROSPECTIVE REGISTRATION OF OBSERVATIONAL STUDIES IN ORDER TO CONSIDER MANUSCRIPTS OF OBSERVATIONAL STUDIES FOR PUBLICATION. IT IS FOR THIS REASON THAT MCTC RECOMMENDS PROSPECTIVE REGISTRATION OF OBSERVATIONAL STUDIES IN A PRIMARY REGISTER OF THE WHO INTERNATIONAL CLINICAL TRIALS REGISTRY PLATFORM (ICTRP) OR CLINICAL.TRIALS.GOV (See section 4.3 for further details).

#### Ethical

- 1) The Declaration of Helsinki explicitly states that "every clinical trial must be registered in a publicly accessible database before recruitment of the first subject". The Declaration is the cornerstone document guiding the ethical conduct of research in humans by physicians.
- 2) The World Health Organization (WHO) considers the registration of all interventional trials to be "a scientific, ethical and moral responsibility"
- 3) Australia has also endorsed trial registration in two key documents which guide the conduct of Human Research Ethics Committees and the conduct of Australians undertaking research in humans.
  - a. The 2007 revision of the National Statement on Ethical Conduct in Human Research contains clause 3.3.12 which states "Before beginning the clinical

- phase of the research, researchers should register clinical trials in a publicly accessible register".
- b. The 2007 revision of the Australian Code for the Responsible Conduct of Research which was jointly issued by the NHMRC, the Australian Research Council and Universities Australia also contains a clause regarding trial registration. Clause 4.10 of this document states that "researchers must register clinical trials with a recognised register to promote access to information about all clinical trials."
- 4) Ethics committees are increasingly requiring prospective registration as a requirement of ethical approval. RCH HREC requires prospective registration for clinical trials as outlined in SOP RCH0498: Investigators Responsibilities in Research, dated 08 September 2017.

### Legal

Registration of clinical trials is not legally required in Australia or New Zealand. However there is a legal requirement to register FDA-regulated clinical trials that meet the FDAAA 801 definition of an "applicable clinical trial" and were either initiated after September 27, 2007 or initiated on or before that date and were still ongoing as of December 26, 2007.

Sponsors of Applicable Clinical Trials must register their trial and report summary results to ClinicalTrials.gov, the registry managed by the National Library of Medicine and the National Institutes of Health (NIH), in accordance with [42 CFR Part 11 Clinical Trials Registration and Results Information Submission: Final Rule](#) that was published on September 16, 2016.

Applicable Clinical Trials meet the following conditions:

Study type is interventional  
Study phase is NOT phase 1  
Studies an FDA-regulated drug product (including biologic product)  
One or more of the following:  
    At least one U.S. facility location  
    Product manufactured in and exported from the United States  
    Conducted under an FDA Investigational New Drug (IND) application

OR

Study type is interventional  
Primary purpose is NOT device feasibility  
Studies an FDA-regulated device product  
One or more of the following:  
    At least one U.S. facility location  
    Product manufactured in and exported from the United States  
    Conducted under an FDA Investigational Device Exemption (IDE)

Therefore, RCH/MCRI IITs that meet the criteria outlined above must be registered on ClinicalTrials.gov, not only for the purpose of meeting ICMJE requirements for publication, but for meeting the legal mandate for registering and reporting summary results required by the FDA. **Note that the timeframe for registration must be before first participant enrolled in order to meet the ICMJE requirements for publication.**

## **The philosophy behind mandatory registration**

Registration is designed to increase the veracity of trial results and reduce bias. One aim is to identify the existence of so called “negative trials” which may never be published because they are negative. This reduces publication bias. Another aim is to prevent sponsors from suppressing results which they don’t want made public for commercial or other nefarious reasons. Lastly registration prevents outcome switching or selective reporting where investigators consciously or subconsciously place undue emphasis on outcomes where there were differences and ignore or downplay outcomes where no difference was found. Registration for trials is now universally regarded as good research practice. There is also a push for registering analysis plans and/or protocols for observational clinical research and laboratory research prior to conducting the analyses. This has not been mandated due to logistical complexities, however some journals now do mandate this, and it is increasingly regarded as good research practice.

**Registration is good for your science as it helps prevent you from weakening your results by subconsciously slipping into data driven hypotheses and analyses.**

Note that most journal editors will carefully check your registration and will query any discrepancy between your registration and your submitted manuscript. There also “fraud busters” who scrutinise registrations and published manuscripts who will write to the journal and post allegations on publically accessible websites accusing you of fraud and/or research misconduct if they find discrepancies.

## **4. PROCEDURE**

### **4.1. When should studies be registered?**

All RCH/MCRI IITs should be registered before the first participant is enrolled to be compliant with ICMJE and the Declaration of Helsinki.

Note: For FDA Applicable Clinical Trials, the timeframe for registration on ClinicalTrials.gov in order to satisfy the Final Rule are below:

- 1) Submission for registration within 21 days after enrolment of the first participant
- 2) Posting (made public): Within 30 days after submission.

**RCH/MCRI IITs that are conducted under an IND must comply with requirements of ICMJE, Declaration of Helsinki and the Final Rule.** In this case, IITs must be registered with ClinicalTrials.gov before the first participant is enrolled and the process from submission to posting must take no more than 30 days.

**The process for registering trials takes some time.** It is therefore recommended that the trial registration is submitted to the registry at least 21 days before the anticipated date of first participant enrolled.

### **4.2. Selecting a clinical trials registry**

The primary consideration for choice of registry is that the registry must meet the ICMJE requirement that it is either a primary register of the [WHO International Clinical Trials](#)

[Registry Platform \(ICTRP\)](#) or [ClinicalTrials.gov](#), which is a data provider to the WHO ICTRP. MCTC recommends registration with ClinicalTrials.gov and/or ANZCTR (bearing in mind the circumstances outlined in Section 3 clarifying where registration with ClinicalTrials.gov is mandatory).

#### **4.2.1. ClinicalTrials.gov**

The Melbourne Children's Trials Centre's (MCTC's) registry of choice is ClinicalTrials.gov. The reasons for this preference are listed below:

- 1) Oversight by MCTC: As MCRI's PRS (Protocol Registration and Results System) Administrator, MCTC is able to assist researchers to register their studies and maintain records in accordance with ClinicalTrials.gov requirements
- 2) All records undergo QA review by ClinicalTrials.gov, ensuring the data entered conforms to the requirements of the registry and US policies and laws that dictate the regulatory requirements and procedures for submitting registration and summary results information
- 3) Summary results can be posted (mandatory for studies conducted under an IND)
- 4) High profile registry thereby assisting visibility of research to a wide audience globally
- 5) ANZCTR registry automatically copies Australian and New Zealand studies registered with ClinicalTrials.gov to their registry
- 6) This is the register that must be used for studies of drugs, devices, biologics regulated by the FDA.
- 7) Registration of observational studies is available.

#### **4.2.2. ANZCTR**

Melbourne Children's Sponsor-Investigators may also choose to register their trial with ANZCTR. Like ClinicalTrials.gov, ANZCTR also accepts observational studies for registration. Unlike ClinicalTrials.gov, it does not include the benefits described in items 1) to 3) above or meet the requirement detailed in item 6).

Sponsor-Investigators who register their trial with ANZCTR are responsible for the following:

- 1) Registering the trial
- 2) The accuracy and completeness of the registered data
- 3) Ensuring the information on any one trial is submitted only once
- 4) Communicating with trial collaborators regarding the registration status of the trial and the registration number
- 5) Ensuring information on the registered trial is kept up-to-date.

You will not be automatically notified by ANZCTR to update your record. Records will be marked "Not up to date" if they have not been updated in the previous 12 months.

To register your trial with ANZCTR, follow the instructions on their website, <http://www.anzctr.org.au/Default.aspx>

### **4.3. ClinicalTrials.Gov**

#### **4.3.1. Requesting a PRS user account**

A PRS User account holder can create and modify their own records but cannot access other users' records unless authorised by the Record Owner or by a PRS Administrator.

To apply for a PRS User account, email [mctc@mcri.edu.au](mailto:mctc@mcri.edu.au) (MCRI PRS Administrator) with the following details:

- Name
- Email
- Phone number

MCTC will create a PRS User account, and within two days the applicant will receive an automated email from ClinicalTrials.gov with instructions for logging in to the PRS.

#### **4.3.2. Creating a new record and entering data**

To register a trial, you will need to create a record in the PRS and enter information about the trial. For further information about the information required, including optional and mandatory sections, refer to the [Protocol Registration Data Element Definitions](#).

**Note:** MCTC requires the Sponsor-Investigator undertake the PRS role, “**Responsible Party**”. The Responsible Party is the “Entity or individual responsible for verifying the accuracy of a trial record and releasing it to ClinicalTrials.gov.” Other users can be authorised to add information to the trial record either before or after a trial is registered.

##### **1) New Record**

From the PRS home page, use either the **New Record** Quick Link or select **New Record** under the Records menu. Both will take you to the **Create New Record** page.

##### **2) Enter the Unique Protocol ID, Brief Title, and Study Type**

Enter the Unique Protocol ID, Brief Title, and Study Type (interventional, observational, or expanded access) for your record on the Create New Record page. Note: If the study has not been assigned a Unique Protocol ID, please use any another unique identifier for your record, such as your HREC approval number.

##### **3) Click Continue**

Click Continue to save data and proceed to the next module.

##### **4) Repeat data entry and click Continue for each module**

Repeat data entry and click **Continue** for each module. When you get to the Edit Arms page, click on **+ Add Arm** and fill in the data for each arm of the study. Click **Continue** after adding the last arm.

##### **5) Click Continue and then Quit on the next module**

To create a record and save for completion at later sessions, click **Continue** and then **Quit** on the next module. Data is saved only after you click on Continue. After clicking Continue on the final data entry page (Edit References), follow the instructions in Section 4.6 Preparing, Approving and Releasing a Study Record to PRS. To continue editing your record, follow the steps in Section 4.7 Modifying a Record.

#### **4.3.3. Reviewing the Record**

Before releasing a record to PRS Staff for review, read it carefully checking for accuracy, completeness, errors and system validation messages.

Use the Preview feature on the Record Summary page to see how the text will appear on ClinicalTrials.gov.

To share the draft record with colleagues who do not have a PRS User account, you can download a Draft Receipt as an Adobe PDF from the Record Summary Page.

#### **4.3.4. Editing a Record**

Follow the process below to modify a record to make edits, update information or enter results:

- 1) Select **Open** next to the section of the record (Protocol, Results, or Delayed Results) to be modified on the Record Summary page.
- 2) Locate the data field to be modified and select **Open** or **Edit** for the corresponding module.
- 3) Make changes on the data entry page.
- 4) Select **Save** to save changes and return to the section page. Repeat steps 2) and 3) for all modules to be modified.
- 5) Update the Record Verification Date data field to the current date.
- 6) Follow the steps to release your record.

#### **4.3.5. Approving a Record**

A record must be approved by the Sponsor-Investigator as the Responsible Party before it can be released to the PRS for PRS Review.

**Note:** Older records generated before implementation of this SOP may have listed the Sponsor as the Responsible Party, in which case MCTC (as the PRS Administrator) takes on this responsibility.

Follow the process below to have your record approved:

- 1) After following the steps outlined in 4.4.2 and 4.4.3, select **Entry Complete** in the Next Action area near the top of the Record Summary page. This will generate an automatic email notification to the Responsible Party.
- 2) The Responsible Party must review and approve the record using the following process:
  - a. Select **Open** Record next to the record ready for approval
  - b. Review the record for accuracy, completeness, errors and system validation messages and modify as required.
  - c. Update the Record Verification Date to the current month and year.
  - d. Select **Approve** on the Record Summary page.

#### **4.3.6. Releasing a Record**

After the record is approved, the last step is for the Responsible Party to release it for PRS Review.

The Responsible Party (generally the Sponsor-Investigator or the PRS Administrator) must follow the process below to release the record:

- 1) **Open** the record
- 2) Select **Release** on the Record Summary page
- 3) Check the box to update Verification Date automatically
- 4) Select **Release** to submit the record to ClinicalTrials.gov for PRS Review.



#### 4.3.7. PRS Review Process

Review of records with registration information takes approximately 2 to 5 business days.

Review of records with results information may take up to 30 days.

PRS Staff will add comments to the record if they identify potential problems and an email notification will be sent to the Record Owner, Responsible Party and last PRS User to update the record.

Comments must be addressed as follows:

**Major Comments:** The Responsible Party must address major comments **within 15 calendar days (registration information) or 25 calendar days (results information)** of the date on which PRS Staff sent the notification.

**Advisory Comments:** These should be addressed to improve the clarity of the record.

If the PRS team requires further changes, the record is returned so change can be made and the Review process is repeated.

Note: If a PRS Administrator (i.e. MCTC) makes changes to an Approved record, it does not need to be approved again. However the record must still be released.

Once the record meets PRS Review criteria, it is posted on the ClinicalTrials.gov website and made available to the public.

#### 4.3.8. Maintaining Records

The Terms & Conditions for organisations and individuals submitting data to ClinicalTrials.gov include the following:

- 1) The submitting organisation, or individual designated as the Responsible Party, is responsible for the completeness and accuracy of the data submitted to the PRS.
- 2) Notice of changes in recruitment status must be provided as soon as possible, but no later than **30 days** after such changes. This includes changes to individual site status, overall recruitment status and completion date.
- 3) All other data must be reviewed, verified, and updated as necessary and no less than **every 12 months**. ClinicalTrials.gov recommends that the Record Verification Date be updated at least every 6 months for studies that are not yet completed, even if there were no changes to the record.

See [How to Edit Your Study Record](#) for details on updating study information.

IT IS THE INVESTGATOR'S RESPONSIBILITY TO KEEP THE REGISTRATION UP TO DATE. CHANGES TO THE PROTOCOL MUST BE MIRRORED BY CHANGES IN THE REGISTRATION. FAILING TO KEEP YOUR REGISTRATION UP TO DATE WILL COMPROMISE YOUR CHANCE OF PUBLICATION AND POTENTIALLY LEAD TO ALLEGATIONS OF MISCONDUCT.
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#### 4.3.9. Submitting Results for Applicable Clinical Trials

*What needs to be submitted?*

The responsible party for an applicable clinical trial must submit summary clinical trial results information to [clinicaltrials.gov](http://clinicaltrials.gov). The information to be submitted depends on the following:

1. Whether the investigational product is:
  - a. Approved, licensed, or cleared by the FDA
  - b. Not approved, licensed or cleared by the FDA
2. If the primary completion date is:
  - a. Before January 18, 2017
  - b. On/after January 18, 2017

Results to be submitted include participant flow, demographic and baseline characteristics, primary and secondary outcomes and adverse event information.

*When must results be submitted?*

In general, results information must be submitted no later than one year after the primary completion date.

Delayed submission and waivers for results submission requires certification from ClinicalTrials.gov prior to the date on which clinical trials results information would otherwise be due. Applicants should refer to 42 CFR 11.44 (b) and 42 CFR 11.54, respectively, for further details.

*What supportive documents must submitted?*

The final rule requires the submission and posting of the full version of the protocol and the SAP (if a separate document) as part of the clinical trial results information as specified in 42 CFR 11.48(a) (5). These documents are required to provide a resource for researchers to enhance the understanding of the trial and enable a more complete evaluation of results.

The protocol and SAP (if submitted as separate document), including all amendments approved by the HREC/IRB, must each contain a cover page that lists the Official Title (title of the clinical trial corresponding to title of the protocol), NCT number and the date of each document.

#### **4.4. Voluntary submission of the protocol and SAP**

Submission of the protocol and SAP is mandatory for Applicable Clinical Trials, as previously discussed in Section 4.3.9.

Although not mandatory, Sponsor-Investigator's of trials that do not meet the definition of an Applicable Clinical Trial are encouraged to submit the protocol and SAP to the primary register ([ClinicalTrials.gov](http://ClinicalTrials.gov) or ANZCTR, as applicable) as evidence of good clinical research practice.

#### **4.5. Saving Evidence of Study Registration and Notifying Stakeholders**

The Sponsor-Investigator must notify the following stakeholders once the study is registered:

- 1) Approving HREC
- 2) Local Principal Investigators at Participating Sites (applicable for multi-centre studies)

The Sponsor-Investigator must provide stakeholders with evidence of registration that includes the date of registration and the trial registration ID, e.g. NCT number (ClinicalTrials.gov) or ACTRN (ANZCTR).

Please refer to instructions below for providing evidence of registration when using ClinicalTrials.gov or ANZCTR.

#### ClinicalTrials.gov

The Sponsor-Investigator/delegate should provide stakeholders with a copy of the PDF Receipt. To download a PDF Receipt:

- 1) Open your record from your Record List and select **Receipt** in the Record Status box.
- 2) Save the file with the following information in the file name: [Unique Protocol ID\_PDF Receipt\_DDMMYY].
- 3) Change the file location so that the document is saved to your Trial Master File (Study Binder)

#### ANZCTR

The Sponsor-Investigator should provide stakeholders with a copy of the View Full Record, saved as a PDF. To download the View Full Record and save as a PDF:

- 1) Open your record and select **View Full Record**
- 2) Right click with the mouse and select **Print**
- 3) **Click save and change the file name to the following format:** [Unique Protocol ID\_PDF Receipt\_DDMMYY].
- 4) Change the file location so that the document is saved to your Trial Master File (Study Binder)

Note: ANZCTR does provide the option to select records for download but the format of downloaded files is not print-friendly. Hence it is recommended you follow the procedure detailed above.

## 5. GLOSSARY

### **ANZCTR**

The Australian New Zealand Clinical Trials Registry (ANZCTR) is a not-for-profit online register of clinical trials being undertaken in Australia, New Zealand and elsewhere. The ANZCTR includes trials from the full spectrum of therapeutic areas of pharmaceuticals, surgical procedures, preventive measures, lifestyle, devices, treatment and rehabilitation strategies and complementary therapies.

Key points about the ANZCTR as published on their website include:

- All details of trials registered on the ANZCTR are made publicly available
- Registration is voluntary, but if a registrant chooses to register a trial, certain fields are mandatory
- The sponsor (Sponsor-Investigator in the case of investigator-initiated trials) is responsible for registration, including the accuracy of the information submitted and maintaining the record to keep it up-to-date.

### **Applicable Clinical Trial**

An applicable device clinical trial or an applicable drug clinical trial.

### **Applicable device clinical trial**

- (1) A prospective clinical study of health outcomes comparing an intervention with a device product subject to section 510(k), 515, or 520(m) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 360(k), 21 U.S.C. 360e, 21 U.S.C. 360j(m) against a control in human subjects (other than a small clinical trial to determine the feasibility of a device product, or a clinical trial to test prototype device products where the primary outcome measure relates to feasibility and not to health outcomes);
- (2) A paediatric postmarket surveillance of a device product as required under section 522 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 3601); or
- (3) A clinical trial of a combination product with a device primary mode of action under 21 CFR part 3, provided that it meets all other criteria of the definition under this part.

#### **Applicable drug clinical trial**

A controlled clinical investigation, other than a phase 1 clinical investigation, of a drug product subject to section 505 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355) or a biological product subject to section 351 of the Public Health Service Act (42 U.S.C. 262), where “clinical investigation” has the meaning given in 21 CFR 312.3 and “phase 1” has the meaning given in 21 CFR 312.21. A clinical trial of a combination product with a drug primary mode of action under 21 CFR part 3 is also an applicable drug clinical trial, provided that it meets all other criteria of the definition under this part.

#### **ClinicalTrials.gov**

ClinicalTrials.gov is an online register that provides patients, their family members, health care professionals, researchers, and the public with easy access to information on publicly and privately supported clinical studies on a wide range of diseases and conditions. The website is maintained by the National Library of Medicine (NLM) at the National Institutes of Health (NIH).

Most of the records on ClinicalTrials.gov describe clinical trials. ClinicalTrials.gov also contains records describing observational studies and programs providing access to investigational drugs outside of clinical trials (expanded access).

ClinicalTrials.gov does not contain information about all the clinical studies conducted in the United States because not all studies are required by law to be registered (for example, observational studies and trials that do not study a drug, biologic, or device). See FDAAA 801 Requirements for more information.

ClinicalTrials.gov was created as a result of the Food and Drug Administration Modernization Act of 1997 (FDAMA). FDAMA required the U.S. Department of Health and Human Services (HHS), through NIH, to establish a registry of clinical trials information for both federally and privately funded trials conducted under investigational new drug applications to test the effectiveness of experimental drugs for serious or life-threatening diseases or conditions. NIH and the Food and Drug Administration (FDA) worked together to develop the site, which was made available to the public in February 2000.

The ClinicalTrials.gov registration requirements were expanded after Congress passed the FDA Amendments Act of 2007 (FDAAA). Section 801 of FDAAA (FDAAA 801) requires more types of trials to be registered and additional trial registration information to be submitted. The law also requires the submission of results for certain trials. This led to the development of the ClinicalTrials.gov results database, which contains summary information on study participants and study outcomes, including adverse events. The results database was made available to the public in September 2008. FDAAA 801 also established penalties for failing to register or submit the results of trials. In September 2016, HHS issued the Final Rule for Clinical Trials Registration and Results Information

Submission (42 CFR Part 11) clarifying and expanding the registration and results information submission requirements of FDAAA 801. This regulation took effect in January 2017.

### **Coordinating Site Lead Principal Investigator (CPI)**

The Investigator who is the lead PI on a multi-centre investigator initiated clinical study. They will also be the principal point of contact between the groups of collaborating investigators/researchers and the approving HREC for a multi-centre ethics approval and have the role of Sponsor-Investigator (see definition below for further information).

### **Investigator**

An individual responsible for the conduct of a clinical trial at a trial site and ensures that it complies with GCP guidelines. If a trial is conducted by a team of individuals at a trial site, the investigator is the responsible leader of the team and may be called the Principal Investigator. In this instance they may delegate tasks to other team members.

### **Investigational Device Exemption (IDE)**

An investigational device exemption (IDE) allows the investigational device to be used in a clinical study in order to collect safety and effectiveness data. Investigational use includes clinical evaluation of certain modifications or new intended uses of legally marketed devices. All clinical evaluations of investigational devices, unless exempt, must have an approved IDE **before** the study is initiated

### **Investigational New Drug application (IND)**

An Investigational New Drug Application (IND) is a request for authorization from the Food and Drug Administration (FDA) to administer an investigational drug or biological product to humans.

### **Observational study**

Observational studies consist of medical research in which the investigator does not assign human subjects to interventions. Observational studies include prospective cohort studies in which individuals receive interventions as part of their medical care, after which the investigator studies pre-specified outcomes to examine the impact of those interventions. Observational studies also include retrospective reviews of patient medical records or relevant literature.

### **Sponsor**

The sponsor is defined by the NHMRC and Therapeutic Goods Administration (TGA) as "an individual, company or institution or organisation which takes responsibility for the initiation, management and/or financing of a clinical trial"

### **Sponsor-Investigator**

Sponsor-Investigator is a term used for investigator-initiated studies. It is an individual who is responsible for both the initiation and conduct of a study. The term does not include any person other than an individual. For multi-centre investigator-initiated studies, the Coordinating Principal Investigator will be the Sponsor-Investigator.

### **Standard Operating Procedure (SOP)**

Detailed, written instructions to achieve uniformity of the performance of a specific function.

### **Trial Master File (TMF) / Study Binder**

The TMF contains all the essential trial specific documentation prepared/collected before the trial commences, during the conduct of the trial and at trial completion in accordance with Good Clinical Practice.

## 6. REFERENCES

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