TITLE: Registration of Clinical Trials on ClinicalTrials.gov		
POLICY #: REGIST-200	**Page:** 1 of 6	**Effective Date:** 8/31/17

1. POLICY STATEMENT:

DF/HCC Investigator-sponsored clinical trials applicable to one of the following policies must be registered and updated on ClinicalTrials.gov: the Food and Drug Administration Amendments Act (FDAAA) of 2007, the Health and Human Services Final Rule, or NIH Policy (2017) for clinical trials registration requirement.

DF/HCC Investigator-sponsored clinical trials that are not applicable to the above policies should be considered for registration to comply with the International Committee of Medical Journal Editors (ICMJE) requirements for publication.

2. BACKGROUND:

Section 113 of the Food and Drug Administration Modernization Act (FDAMA) of 1997 requires the registration of clinical trials that evaluate the efficacy of drugs for serious or life-threatening diseases that are conducted under an Investigational New Drug (IND) application. FDAAA, also known as U.S. Public Law 110-85, expanded the scope of registration and results reporting of clinical trials at ClinicalTrials.gov.

The Health and Human Services Final Rule and the NIH Policy, effective on January 18, 2017 further enhanced the clinical trials registration and results reporting requirement. FDAAA, HHS-Final Rule and or the NIH Policy require the reporting of aggregate results and summary adverse event information for certain applicable trials.

As of 2005, most medical journals, including ICMJE member publications, required as a condition of consideration for publication, the prospective registration of certain clinical trials. Failing to register makes the results of the trial ineligible for publication in the ICMJE member journals.

3. RESPONSIBLE PERSONNEL:

3.1. Overall Principal Investigator (PI)
3.2. ODQ Clinical Trials Registration Coordinator

4. DEFINITIONS:

4.1. **Applicable clinical trial definition** (**FDAAA-801)**: Generally includes interventional studies (with one or more arms) of drugs, biological products, or devices that are subject to FDA regulation, meaning that the trial has one or more sites in the United States, involves a drug, biologic, or device that is manufactured in the United States (or its territories), or is conducted under an IND or investigational device exemption (IDE). This excludes Phase I trials.

4.2. **Applicable Clinical Trial Definition (HHS Final Rule**): Applicable clinical trials of FDA-regulated drug, biological, and device products and pediatric post-market surveillance studies of devices required by the FDA under the FD&C Act. Does not apply to Phase I trials or small feasibility device studies.

4.2.1. Applicable clinical trials are (1) clinical trials of drug and biological products that are controlled, clinical investigations, other than phase 1 investigations, of a product subject to FDA regulation; and (2) prospective clinical studies of health outcomes comparing an intervention with a device product against a control in humans (other than small feasibility studies) or any pediatric post-market surveillance studies required by FDA under the FD&C Act."

4.3. **Applicable Clinical Trial Definition (NIH Policy):** "All clinical trials funded wholly or partially by NIH. This includes Phase I clinical trials and trials that do not involve any FDA regulated product such as trials involving only behavioral interventions."

4.4. **Applicable Clinical trial definition (International Committee of Medical Journal Editors (ICMJE)):** "The ICMJE defines a clinical trial as any research project that prospectively assigns people or a group of people to an intervention, with or without concurrent comparison or control groups, to study the cause-and-effect relationship between a health-related intervention and a health outcome. Health-related interventions are those used to modify a biomedical or health-related outcome; examples include drugs, surgical procedures, devices, behavioral treatments, educational programs, dietary interventions, quality improvement interventions, and process-of-care changes. Health outcomes are any biomedical or health-related measures obtained in patients or participants, including pharmacokinetic measures and adverse events. The ICMJE does not define the timing of first patient enrollment, but best practice dictates registration by the time of first patient."

4.5. **ClinicalTrials.gov:** A public database developed by the U.S. National Institutes of Health (NIH), provided through its National Library of Medicine (NLM), that meets FDAMA, FDAAA, HHS Final Rule, NIH Policy and ICMJE requirements.

4.6. **Responsible Party:** The sponsor of the clinical trial or the principal investigator of the trial if so designated by the sponsor, grantee, contractor, or awardee.

4.7. **Primary Completion Date:** The date that the final participant was examined or received an intervention for the purposes of final collection of data for the primary outcome, whether the clinical study concluded according to the pre-specified protocol or was terminated. In the case of clinical studies with more than one primary outcome measure with different completion dates, this term refers to the date on which data collection is completed for all of the primary outcomes.

5. POLICY:

5.1. Clinical Trial Registration

5.1.1. All applicable clinical trials must be registered through the ClinicalTrials.gov Protocol Registration System (PRS) at http://register.clinicaltrials.gov.

5.1.2. The initial registration must be created by ODQ for clinical trials where a DF/HCC investigator is the Responsible Party. The Responsible Party must review and release the registration.

5.1.2.1. In limited cases for non-interventional trials only, and with approval of the ODQ Director, the initial registration may be performed by the institutional clinical trials office.

5.1.2.2. For trials associated with an externally held IND or IDE (e.g., non-DF/HCC investigator, or industry), the IND/IDE holder is responsible for registration. However, for trials sponsored or funded wholly or in part by the NIH, Cancer Therapy Evaluation Program (CTEP) or National Cancer Institute (NCI), the Overall PI should contact the sponsor or funding agency to determine registration responsibilities.

5.1.3. The responsible party is required to update and release the registration record during the course of the trial in compliance with all applicable requirements.

5.1.4. Trials must be registered on Clinicaltrials.gov after IRB approval but prior to first subject enrollment.

5.1.5. Generally speaking the registration and update requirements include:

5.1.5.1. Initial registration of the trial on ClinicalTrials.gov.

5.1.5.2. Updates every 6 months for studies that are not yet completed, even if there were no changes to the record.

5.1.5.3. Updating the Primary Completion Date. For active studies, this means updating the Anticipated date of expected completion over the course of the study. Upon study completion, the Actual date should be entered.

5.1.5.4. Updates to the record within 30 days for Site Recruitment Status and Overall Recruitment Status Changes.

5.1.5.5. Other changes and updates to the record must be made at least every 12 months.

5.1.6. The Responsible Party may contact their institutional PRS Administrator to establish accounts and/or gain access to the ClinicalTrials.gov PRS site.

5.2. **Result and Adverse Event Reporting**

5.2.1. The Responsible Party is responsible for submitting basic results and adverse event information for certain applicable clinical trials through the ClinicalTrials.gov Protocol Registration System (PRS) at https://register.clinicaltrials.gov.

5.2.2. For applicable clinical trials that are subject to 42 CFR 11.42, the standard submission deadline for results information is no later than 1 year after the study's Primary Completion Date, as described in 42 CFR 11.44(a) of the final rule.

5.2.3. The regulations provide for the delayed submission of results information under certain conditions (see 42 CFR 11.44(b)).

5.2.4. Summary data must be specified in a meaningful and precise manner to allow people not familiar with the trial to interpret the data.

6. APPLICABLE REGULATIONS & GUIDELINES:

21 CFR 50 – Protection of Human Subjects
Food and Drug Modernization Act (FDAMA) of 1997
FDA Amendments Act of 2007 (FDAAA or Public Law 110-85)
Final Rule for Clinical Trials Registration and Results Information Submission (42 CFR Part 11)
NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information
ICMJE Web site http://www.icmje.org

7. RELATED REFERENCES:

DF/HCC ClinicalTrials.gov Registration Website
http://www.dfhcc.harvard.edu/research/clinical-research-support/office-of-data-quality/services-support/ctgov-ctrp-national-protocol-registration/
ClinicalTrials.gov Web site http://clinicaltrials.gov
FDAAA-801 Requirementshttps://clinicaltrials.gov/ct2/manage-recs/fdaaa
Clinicaltrials.gov Protocol Registration Data Element Definitions
http://prsinfo.clinicaltrials.gov/definitions.html
Final Rule Information https://prsinfo.clinicaltrials.gov/
Summary of HHS/NIH Initiatives to Enhance Availability of Clinical Trial Information https://www.nih.gov/news-events/summary-hhs-nih-initiatives-enhance-availability-clinical-trial-information
Summary Table of HHS/NIH Initiatives to Enhance Availability of Clinical Trial Information
https://www.nih.gov/news-events/summary-table-hhs-nih-initiatives-enhance-availability-clinical-trial-information
NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information
https://grants.nih.gov/grants/guide/notice-files/NOT-OD-16-149.html
ClinicalTrials.gov Protocol Registration System (https://register.clinicaltrials.gov)
ClinicalTrials.gov User's Guide https://clinicaltrials.gov/ct2/manage-recs
Public Law 110-85 Information Page (https://clinicaltrials.gov/ct2/manage-recs/fdaaa
Data Elements for Results Reporting
(http://prsinfo.clinicaltrials.gov/results_definitions.html)
International Committee of Medical Journal Editors (http://www.icmje.org/about-icmje/faqs/clinical-trials-registration)

8. RELATED RESOURCES:

DF/HCC Guidance on Common Mistakes with ClinicalTrials.gov Records
DF/HCC Guidance on Registering a Protocol on ClinicalTrials.gov

DF/HCC Guidance on Managing a ClinicalTrials.gov Record
DF/HCC List of Institutional PRS Administrators