CLINICAL TRIALS **TRANSFORMATION** INITIATIVE

February 15, 2024

CTTI ClinicalTrials.gov Reporting Challenges Project:

Improving Timely, Accurate, and Complete Registration and Reporting of Summary Results on ClinicalTrials.gov

WELCOME

2024 CTTI REPORT

Improving ClinicalTrials.gov Registration and Reporting

- Thank you for joining us!
- This meeting is being recorded
- All participants are muted upon entry
- Please type any questions in the chat box

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Agenda

Time (EST)	Content	Presenter
12:00 PM	Welcome and Agenda	Kelly Franzetti, CTTI
12:05 PM	Project Introduction & Purpose	Danielle Villata, Center for Drug Evaluation Research, FDA Patrick Zhou, Center for Drug Evaluation Research, FDA
12:10 PM	Interviews & Survey Findings	Kelly Franzetti, CTTI
12:25 PM	Panel Discussion	Sara Calvert, *Moderator*, CTTI Carrie Dykes, University of Rochester Elisa Golfinopoulos, National Institutes of Health Karen Heraty, Eli Lilly Miah Jung, Center for Drug Evaluation and Research, FDA Suzanne Pattee, Office of Clinical Policy and Programs, FDA
12:45 PM	Panel Q&A Summary and Resources	Sara Calvert, CTTI
12:55 PM	Closing Remarks	Sara Calvert, CTTI
1:00 PM	Adjourn	

Introduction

- A robust ClinicalTrials.gov data bank is an invaluable resource
- FDA is committed both to upholding its enforcement responsibilities for ClinicalTrials.gov and to promoting voluntary adherence to clinical trial data transparency standards
- In the last few years, we've published guidance and issued over 100 Pre-Notice letters for potential noncompliance and 5 Notices of Noncompliance letters, all available on FDA's website
- FDA is exploring how the agency might help responsible parties meet these obligations before pre-notices or notices are issued
- To inform potential next steps, FDA wanted to know what the common challenges were related to registering trials and reporting summary results information to ClinicalTrials.gov

ClinicalTrials.gov Reporting Challenges Project

Purpose

- Provide information to support and strengthen more systematic and complete reporting of applicable clinical trial information to ClinicalTrials.gov

Scope

- While FDA is primarily responsible for enforcing registration and reporting, FDA is interested in ways it can help foster and encourage proactive registration and reporting
- Factors that can affect timely, accurate, and complete registration and summary results information submission for applicable clinical trials
- Intended to complement NIH's ClinicalTrials.gov modernization initiative, so ClinicalTrials.gov and Protocol Registration and Results System user interface is out of scope

Applicable Clinical Trials (ACT)

- Are controlled interventional trials that involve at least one drug, biological, or device product regulated by the FDA
- Meet one of the following:
  - Have at least one U.S. trial site
  - Are conducted under an investigational new drug application or investigational device exemption
  - Involve a drug, biological, or device product manufactured in and exported from the U.S. for study in another country
- Are not a phase 1 trial of a drug or biologic product, or device feasibility study
- The National Library of Medicine at the NIH created a checklist*, available on the ClinicalTrials.gov website, to assist responsible parties in determining whether a trial is an ACT

*https://prsinfo.clinicaltrials.gov/ACT_Checklist.pdf

Project Overview

Participants

Individuals responsible for:

- Submitting required clinical trial information into ClinicalTrials.gov

and/or

- Managing their organization's compliance with the ClinicalTrials.gov registration and summary results information reporting requirements

Data Collection

Method: In-depth interviews
N=26

Purpose:

- Describe organizational processes and policies on ClinicalTrials.gov registration and reporting of summary results information
- Identify challenges that affect the timely, accurate, and complete registration of applicable clinical trials and reporting of summary results information into ClinicalTrials.gov and propose solutions

Method: Survey
N=92

Purpose:

- Utilize information obtained from in-depth interviews to describe the prevalence of ClinicalTrials.gov processes, challenges, and solutions among a larger sample of stakeholders

Final Products

- Public report summarizing findings and suggested good practices

In Development:

- Report to FDA with potential actions to undertake within its scope and authority
- Potential manuscript summarizing key findings

August to December 2021 → December 2022 to February 2023 → Today

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Findings

Approaches to ClinicalTrials.gov Management

- **Centralized/dedicated management approach to ClinicalTrials.gov:** a single office or group vets and supports all submissions of clinical trial information to ClinicalTrials.gov and monitors compliance with requirements
- **Decentralized/distributed management approach to ClinicalTrials.gov:** each Principal Investigator (PI) or another organization employee is solely responsible for meeting clinical trial information reporting requirements
- **Hybrid management approach to ClinicalTrials.gov:** combining both centralized and decentralized components

≥80% Used Centralization

(centralized, hybrid, or other)

- 20 of 25 orgs interviewed
- 75 of 92 survey respondents

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Centralized Management Approach: Advantages & Disadvantages

Disadvantages
Heavy workload/understaffed
Misunderstandings of processes/lots of demands by PIs
AU doesn't have access to data, changes in protocol, not specialists in topics—must wait for responsible party to respond
Stakeholders (i.e., PIs and study teams) may have limited knowledge of ClinicalTrials.gov requirements and limited incentive to stay on top of deadlines

Advantages
Provides a single resource of expertise and support for PIs/study teams for complying with ClinicalTrials.gov requirements
Consistency between studies/submissions
Consistent quality control
Higher success rates for submissions
Timely submissions

From interviews. See Report Appendix D for approach advantages & disadvantages from survey.

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Alerting Systems

How Administrative Units (AU) Become Aware…	
Of trials that need to be registered:	Of trials that need to report summary results
AUs track records in an internal Clinical Trial Management System (n=37, 40%)	AUs review Protocol Registration and Results System reports (n=53, 58%)
PIs contact the AU requesting assistance with registering a trial (n=30, 33%)	AUs track records in an internal Clinical Trial Management System (n=39, 42%)

*Administrative unit: the entity or individual(s) at an organization/institution/company that provides oversight and/or registers and/or reports results information in ClinicalTrials.gov

*Note: Participants could choose all that applied

Top Challenges Related to Registering Clinical Trials

	Top Challenges	
	Responsible Party did not understand the types of trials that must be registered	Non-responsive PIs/Study Leads
No. of respondents who identified this challenge	n=48, 52.2%	n=44, 47.8%

Note: Participants could choose all that applied

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Top Challenges: Reporting Summary Results Information

	Top Challenges – Responsible Party's…		
	understanding of:		concerns about
	which trial results information must be submitted	regulatory timelines for submitting results information	waiting until all data are analyzed before reporting results information to prevent potential discrepancies between ClinicalTrials.gov records and publication
No. of respondents who identified this challenge	n=52, 56.5%	n=47, 51.1%	n=52, 56.5%

Note: Participants could choose all that applied

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Common Resources Utilized

Resources and Tools	n	%
ClinicalTrials.gov PRS Resources (e.g., Quick Start Guide, PRS Users Guide, Guided Tutorials, Hot off PRS Updates, Data Element Definitions, ACT Checklist, Frequently Asked Questions)	89	96.7
ClinicalTrials.gov Training Materials (e.g., Train the Trainer Workshop, Online Presentations)	65	70.7
NIH Policy on the Dissemination of NIH-Funded Clinical Trial Information	43	46.7
FDA Guidance on Civil Money Penalties Relating to the ClinicalTrials.gov Data Bank	40	43.5
FDA website on FDA's Role: ClinicalTrials.gov Information	39	42.4
Clinical Trials Registration and Results Reporting Taskforce	36	39.1

Respondents selected all that applied

Additional Resources Requested by Survey Participants

Resource	n	%
General Resources		
Tutorials and tip sheets about changing regulations and adjustments in ClinicalTrials.gov as changes happen	71	72
Providing a list of common mistakes made during the PRS review process	64	70
Resources/Information from FDA		
Pre-recorded informational sessions on ClinicalTrials.gov compliance	57	60
Virtual events, conferences and workshops	54	59
Better communication around FDA Guidance documents	52	56.5

Respondents selected all that applied

Suggested Practices

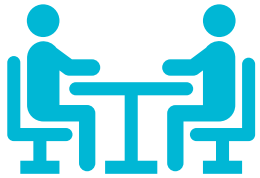
Centralized Approach

- Employ proactive approach to monitoring ACT registration, updates, and results reporting
- Provides centralized knowledge resources and ability to create consistency in internal reviews
- Caveats: where volume and resources allow, some choose to keep PI/study team as responsible party

Systems for Tracking & Trending

- Use of Protocol Registration System reports, clinical trial management systems and/or other internal systems
- Trends in PRS reviewers' comments to create best practices for organization's data submitters and internal reviewers
- Track deadlines for updates and results registration

Suggested Practices



Collaboration & Communication

- Collaboration between administrative Units (AU) & Study Teams, and other internal groups such as Human Research Protection Program/IRB
- Senior leadership involvement to communicate importance and allocate resources
- Communication of upcoming due dates and any issues with existing records - facilitates compliance and assists in resolving challenges

Education & Training

- PIs/study team education, training resources, support
- Improves knowledge and understanding of importance of clinical trial reporting requirements

Panel Discussion

Moderator: Sara Calvert, *Director of Projects, CTTI*

Panelists

- *Carrie Dykes, University of Rochester*
- *Elisa Golfinopoulos, National Institutes of Health*
- *Karen Heraty, Eli Lilly*
- *Miah Jung, Food and Drug Administration*
- *Suzanne Pattee, Food and Drug Administration*

Next Steps & CTTI News

- ClinicalTrials.gov Reporting Challenges report now available:

Scan QR code to view report

- Database for the Aggregate Analysis of ClinicalTrials.gov (AACT)
  - User survey planned
  - https://aact.ctti-clinicaltrials.org/

Closing Remarks

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Thank you to the project team!

Project Page Link: https://ctti-clinicaltrials.org/our-work/quality/challenges-meeting-u-s-clinicaltrials-gov-reporting-requirements/

Questions: kelly.franzetti@duke.edu or sara.calvert@duke.edu

Scan QR code to view report

THANK YOU

www.ctti-clinicaltrials.org