



ClinicalTrials.gov

Background

Clinical Trials registration is public disclosure of key information of a clinical trial. The US Food and Drug Administration (FDA), the International Committee of Medical Journal Editors (ICMJE), and the World Health Organization (WHO) are just a few of the groups calling for clinical trials registration.

In 1997, the Food and Drug Administration Modernization Act (FDAMA) required registration of certain clinical trials in a national database, ClinicalTrials.gov. In 2007, the Food and Drug Administration Amendments Act (FDAAA,) extended registration requirements and added results and adverse events reporting.

In 2005, the International Committee of Medical Journal Editors (ICMJE) implemented a policy requiring investigators to register interventional studies as a condition of consideration for publication.

ICMJE signatories:

New England Journal of Medicine, Journal of the American Medical Association, Annals of Internal Medicine, The Lancet, The Medical Journal of Australia, The New Zealand Medical Journal, Norwegian Medical Journal, Canadian Medical Association Journal, Croatian Medical Journal, Dutch Journal of Medicine, Journal of the Danish Medical Association

ClinicalTrials.gov is a registry of clinical trials operated by the National Library of Medicine that captures:

Key summary protocol information before/during the trial

Summary results and adverse event information of a completed trial

Registration Requirements

1) FDA Regulated Research:

FDA requires registration of 'Applicable Trials'. An 'Applicable Trial' is defined as:

- Phase 2 – 4 Interventional studies;
- Studies involving drugs, biologics, or medical devices regulated by FDA;
- Studies that have at least one site in the US or is conducted under an IND or IDE;
and
- Studies initiated or ongoing as of September 27, 2007 or later

For more information regarding 'applicable clinical trials', see [Elaboration of Definitions of Responsible Party and Applicable Clinical Trials](#):

(2) ICMJE

[ICJME](#) requires registration of any human research project that prospectively assigns human subjects to intervention or comparison groups to study the cause-and-effect relationship between a medical intervention and a health outcome

Who Is Responsible For Registration?

1) FDA regulated research:

According to federal law, the 'Responsible Party' is responsible for registering and reporting results to ClinicalTrials.gov and is defined as:

The IND/IDE holder of the trial

For studies not conducted under an IND/IDE

The study sponsor or the grantee institution, i.e. Children's Hospital
Principal Investigator, if there is no external funding agreement

Situations in which Institution/PI is NOT the Responsible Party

For most industry sponsored trials, the sponsor will be the Responsible Party, and, as such, the institution and PI will NOT have to manage submissions to CT.gov. Similarly, for multi-center trials, only the lead site (Overall PI) typically bears responsibility for CT.gov reporting; site PIs typically do not have to do additional reporting.

Situations in which Institution/PI is the Responsible Party

For trials being conducted under a funding agreement or grant (e.g. NIH awards), the funding recipient (e.g. CH) is considered the Responsible Party. Because the PI is in best position to understand the research protocol study results and adverse events, the institution will designate the Principal Investigator to assume the role of the Responsible Party.

In situations where CH serves as the primary site for a clinical trial and the institution is determined to be the "Responsible Party," the Institution will designate this responsibility to the Principal Investigator.

What are the criteria for designating the Principal Investigator as the "Responsible Party" for registering and reporting results?

According to federal law, the Principal Investigator can serve as a Responsible Party if that individual

Is responsible for conducting the trial

Has access to and control over the data from the clinical trial

Has the right to publish the results of the trial

Do I need to provide evidence of compliance with ClinicalTrials.gov regulations to the granting or regulatory agency?

Yes, both the NIH and the FDA require that Investigators certify compliance with all ClinicalTrials.gov reporting requirements.

The NIH requires that Investigators list the clinical trial registration number, study title, and name and contact information of the responsible party on all progress reports involving an NIH funded clinical trial. For new trials, a statement confirming the study will be registered should be included in the Human Subjects section of the Research Plan.

The FDA requires that investigators submit FDA form 3674 with applicable trials conducted under an IND or IDE. The form, and instructions on submission requirements are available on the FDA web site.

For additional details, please see [**Elaboration of Definitions of Responsible Party and Applicable Clinical Trials.**](#)

(2) ICMJE Registration:

While anyone involved in the clinical trial could register the trial, in practice this responsibility usually falls with the individual submitting the publication to the ICMJE journal, which is usually the Principal Investigator.

The Registration Process

You must work through the Children's Hospital "institutional account". Do not go directly to ClinicalTrials.gov, they will simply send you back to us.

Children's Hospital has designated a Registration Administrator in the Office of Clinical Investigations to set up accounts for investigators to register. Please follow the following instructions

- Investigators should email the Registration Administrator [**irine.bretburg@childrens.harvard.edu**](mailto:irine.bretburg@childrens.harvard.edu) and provide the following information:
 - Children's username
 - Full Name, (first, last)
 - CH badge ID number
 - Email Address

- The Administrator will enter this information into the ClinicalTrials.gov web site, thus creating a "profile" for the investigator. The ClinicalTrials.gov web site then sends confirmation directly to the investigator regarding his/her ability to sign onto the web site and begin the registration process.

- The investigator can then enter the study registration information. An email will be automatically sent to the Administrator, who will “release” the registration to the web site.
- If ClinicalTrials.gov has any questions related to the study or information about the study - their query will be sent directly to the investigator (or designee).

When do you Register and update a Study

Registration:

FDA: No later than 21 days after enrolling the first subject.

ICMJE: Before recruitment of the first subject

Updating

Once a trial is registered, both the FDA and the ICMJE require that registrations be updated as follows:

FDA Information must be updated at least every 12 months

Additionally the registry must be updated within 30 days of any changes in recruitment status or completion of study

ICMJE: requires updating study information every 6 months

Posting Basic Results

In 2007, FDAAA expanded its requirements regarding posting clinical trials to their web site. As of September 2008, posting basic study results has become mandated.

Basic results posting is required for trials of FDA-approved drugs and devices. Submission of results is required within 12 months after primary endpoint completion date.

Delayed submission of result posting may occur due to

Seeking initial approval of investigational product

Seeking approval for a new use

Extensions for a ‘good cause’

The following outlines the expectations around this basic results posting:

1. Demographic and Baseline Characteristics of Patient Sample: A table of the demographic and baseline data collected overall and for each arm of the clinical trial to describe the patients who participated in the clinical trial, including the number of patients who dropped out of the clinical trial and the number of patients excluded from the analysis, if any.
2. Primary and Secondary Outcomes: The primary and secondary outcome measures, as stated in FDAAA Section 801, and a table of values for each of the primary and secondary outcome measures for each arm of the clinical trial, including the results of scientifically appropriate tests of the statistical significance of such outcome measures.

3. Point of Contact: A point of contact for scientific information about the clinical trial results.
4. Certain Agreements: Whether there exists an agreement (other than an agreement solely to comply with applicable provisions of law protecting the privacy of participants) between the sponsor or its agent and the principal investigator (unless the sponsor is an employer of the principal investigator) that restricts in any manner the ability of the principal investigator, after the completion date of the trial, to discuss the results of the trial at a scientific meeting or any other public or private forum, or to publish in a scientific or academic journal information concerning the results of the trial.

Posting Adverse Events

As of September 27, 2009 posting of adverse events is mandatory. Adverse event posting is required for trials of FDA-approved drugs and devices. Adverse event postings are required to be submitted at the time of results posting.

The following must be reported:

serious adverse events and

other (non-serious) adverse events that exceed a frequency threshold of 5 percent in any arm of the clinical trial.

The following can voluntarily be reported:

Adverse events occurring with less than 5 percent frequency

Additional Resources

For more information, see [***PRS and U.S. Public Law 110-85***](#).

Presentation: ClinicalTrials.gov "Basic Results" Database [Deborah Zarin, MD, Dec 2008]

Module 1: ClinicalTrials.gov Overview and PL 110-85 Requirements

Module 2: "Basic Results" Data Entry

Module 3: Posted Results at ClinicalTrials.gov

NIH Guidance on Clinical Trials Registration in ClinicalTrials.gov

Common Questions and Answers

I just received an email from ClinicalTrials.gov informing me that my record is "In Progress". What does "In Progress" mean to me?

NIH identifies the progress of clinical trials registration in stages. "In Progress" means that you are creating (or modifying) the record

I just received an email from ClinicalTrials.gov informing me that my record is "Completed". What does "completed" mean to me?

NIH identifies the progress of clinical trials registration in stages. "Completed" means you have finished entering the data for this study and the record is now ready for review.

I just received an email from ClinicalTrials.gov informing me that my record is "Approved". What does "approved" mean to me?

NIH identifies the progress of clinical trials registration in stages. "Approved" means the Institutional Administrator has reviewed the record and has made any necessary changes.

I just received an email from ClinicalTrials.gov informing me that my record is "Released". What does "released" mean to me?

NIH identifies the progress of clinical trials registration in stages. "Released" means the Institutional Administrator has released the record for posting to ClinicalTrials.gov.

Why can I not find my trial in ClinicalTrials.gov?

After a protocol record has been entered (or modified) and marked as 'Complete', it must be approved and released by a CH administrator. From the time the record is released, it normally takes between 2 and 5 working days for internal quality assurance review and processing for publication on the ClinicalTrials.gov website. Records that contain Results may take up to 30 days.

When will the "NCT number" for my trial be assigned?

The NCT number is assigned following quality assurance review, just prior to publication on ClinicalTrials.gov (see above). The NCT number then becomes visible in the protocol Registration System .

Who should I list as the sponsor in the ClinicalTrials.gov database?

- a. If your study was initiated and funded by a pharmaceutical or device company, the company is the sponsor. Check with them about registration.
- b. If your study is funded by the federal government and you are the grantee, the granting agency is the sponsor.
- c. If the study is funded (or not) in any other way, your "home hospital/institution" is considered the "sponsor".

Who is the “Oversight Authority” the ClinicalTrials.gov database?

- a. If your study involves a drug, biologic or device, the oversight authority should be listed as: United States: Food and Drug Administration.
- b. If your study does not fall under the FDA’s purview, the oversight authority should be listed as: United States: Institutional Review Board.

What about collaborators?

List all collaborators applicable to a specific trial. If ClinicalTrials.gov does not have a match for a collaborator in their system, a link to ‘recognize it’ will appear.

What is the NIH Public Policy Access?

[NIH Public Policy Access](#) ensures that the public has access to the published results of NIH funded research. It requires scientists to submit final peer-reviewed journal manuscripts that arise from NIH funds to the digital archive [PubMed Central](#) upon acceptance for publication. To help advance science and improve human health, the Policy requires that these papers are accessible to the public on PubMed Central no later than 12 months after publication.

Is this policy the same as the requirement for registering clinical trials?

NO. These are two separate and unrelated requirements

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