

PRS Account: Roles and Responsibilities

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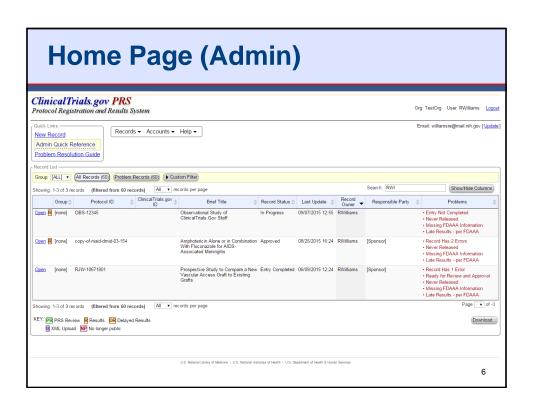
PRS Roles and Terms

- Administrator: maintains PRS Account for organization (may be more than one)
- User: creates and edits records (unlimited number per PRS Account)
- Record Owner: primary contact for study record (may be Admin or User)
- Responsible Party: Sponsor* (Admin) or Principal Investigator (User)

* For Sponsor definition see: https://prsinfo.clinicaltrials.gov/ElaborationsOnDefinitions.pdf

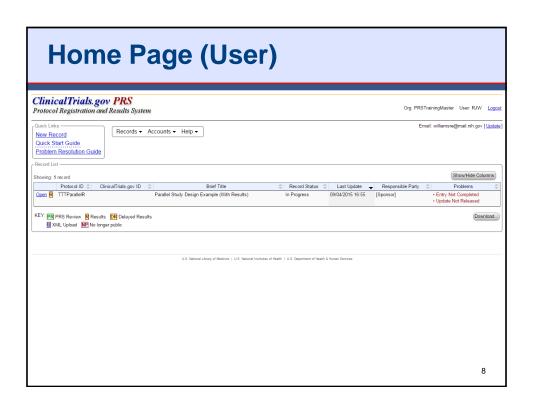
PRS Administrator

- Maintains PRS Account for organization
 - Creates/disables Users within account
 - Has access to all study records
 - · Can grant Users access to any study record
 - Monitors records in account for "Problems"
 - Use Record List to identify records with Problems; work with Users to resolve Problems
 - Email is sent to Admin, generally every 6 months, notifying of Problems with records in their account at that time
 - Approves and Releases records when the Organization is the Sponsor <u>and</u> Responsible Party
 - Email is sent to Admin when a record is ready for Approval and Release



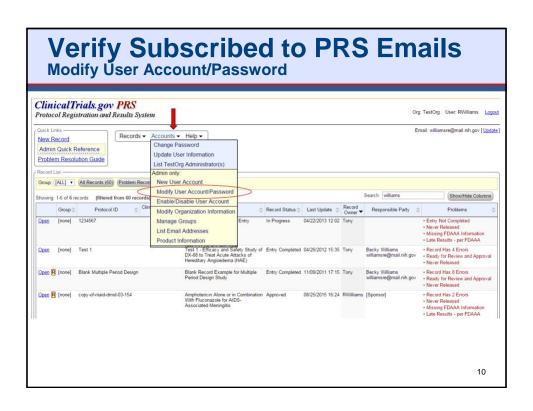
PRS User

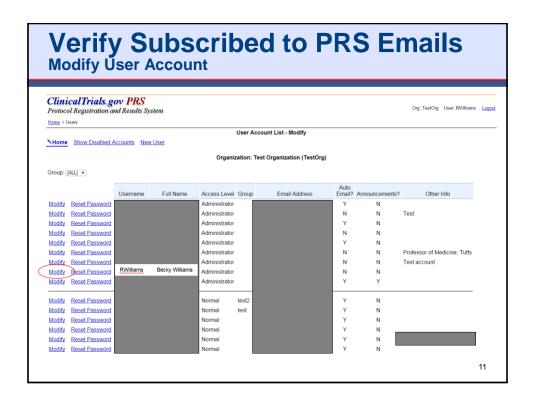
- · Creates and edits records
 - Only has access to records in which they are the Record Owner or on the Access List
 - Approves and Releases records when a Sponsor-Investigator or Principal Investigator is the Responsible Party



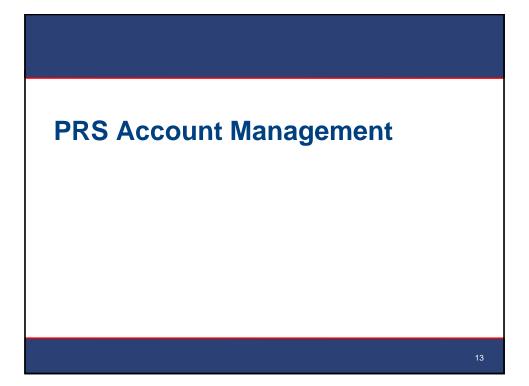
PRS Record Owner

- Primary contact for study record
 - Initially assigned to person who created the study record; record ownership can be transferred (by Admin)
 - Can grant other Users access to the record
 - Receives email communications about record
 - · Automatically signed up to receive email; can't opt out
 - Responsible Party will also receive emails (if not Record Owner)

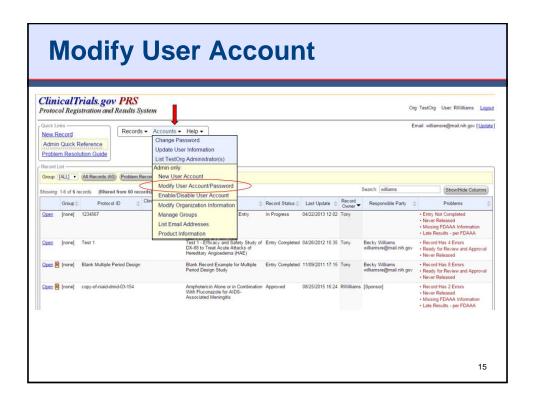


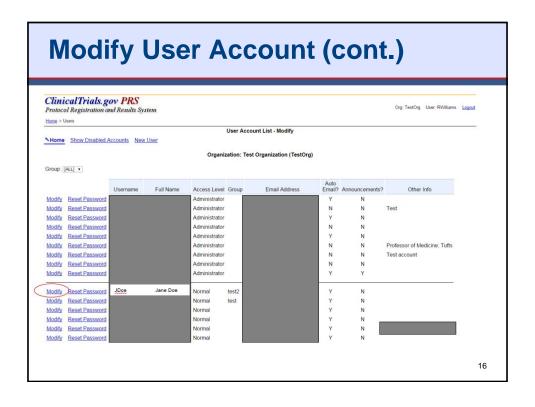




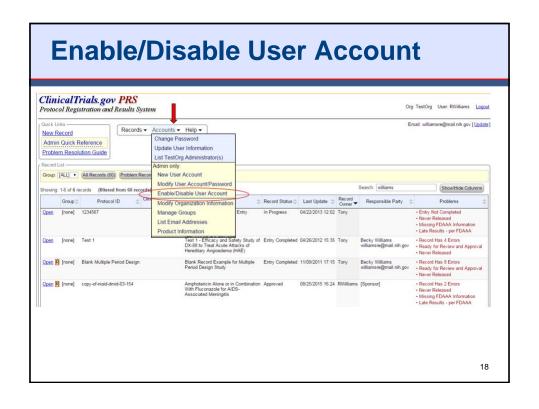


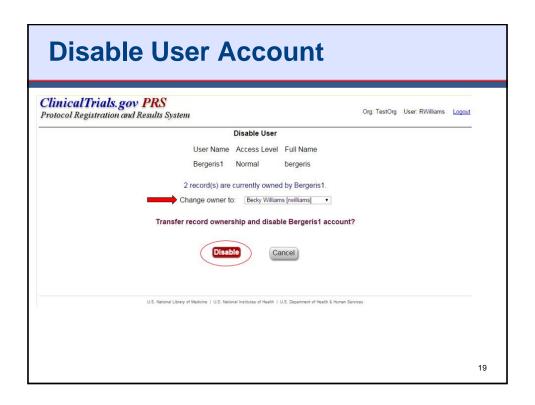




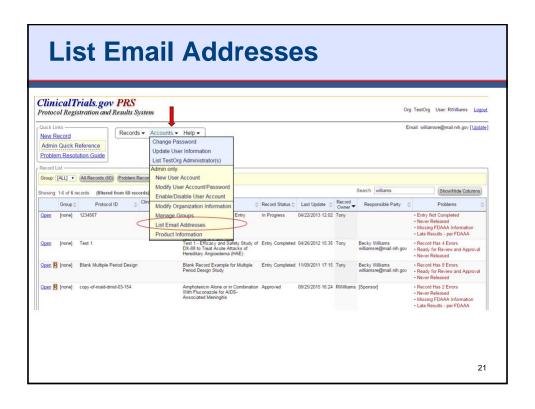


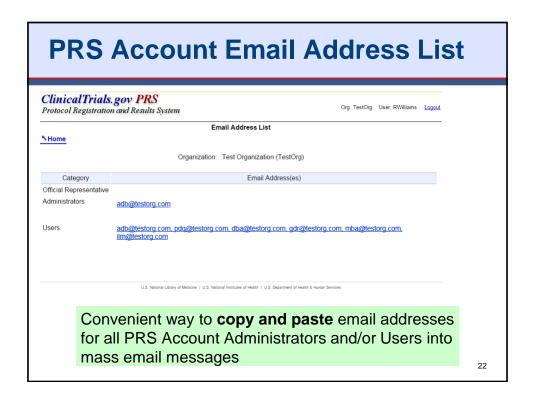


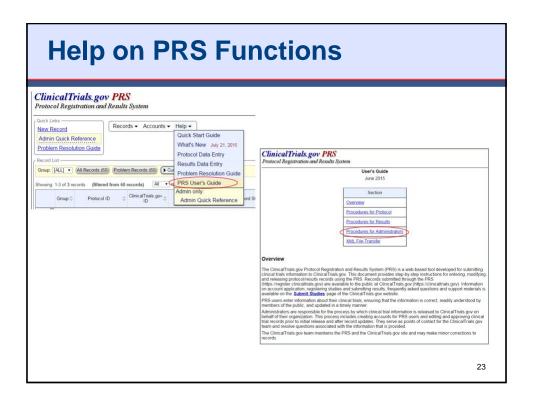




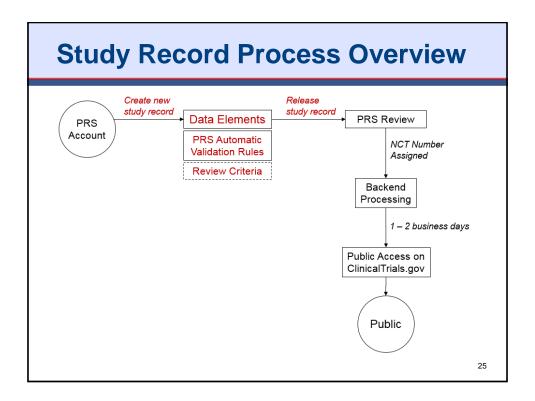








PRS: Study Record Basics



Items To Consider Before Registering a Protocol

- Each protocol can only be registered once
 - Avoid duplicate registrations (i.e., multiple records for same study)
 - · Agree on the Sponsor and the Responsible Party ahead of time
 - Multisite studies are NOT registered by each individual site
 - Multi-collaborator/funder studies need to designate a single entity to register the study
- Studies must be registered by the Responsible Party (study Sponsor or designated Principal Investigator [PI])

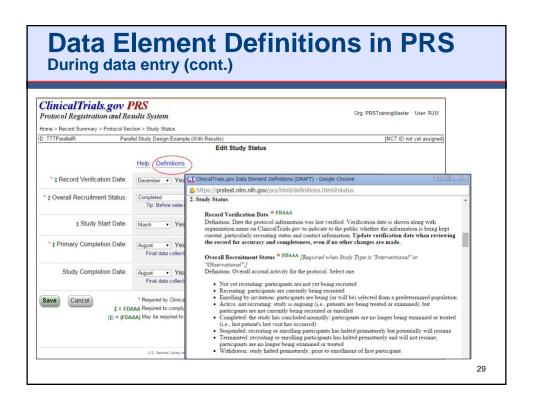
http://prsinfo.clinicaltrials.gov/fdaaa.html

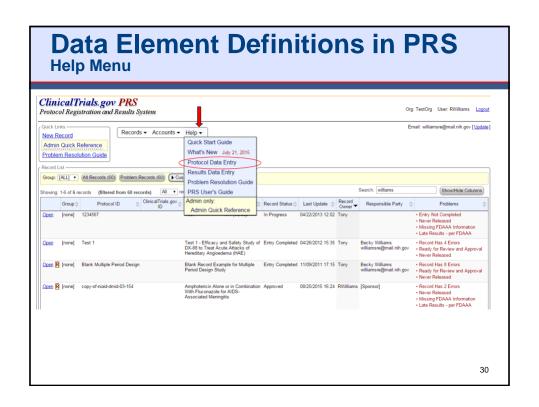
Data Elements

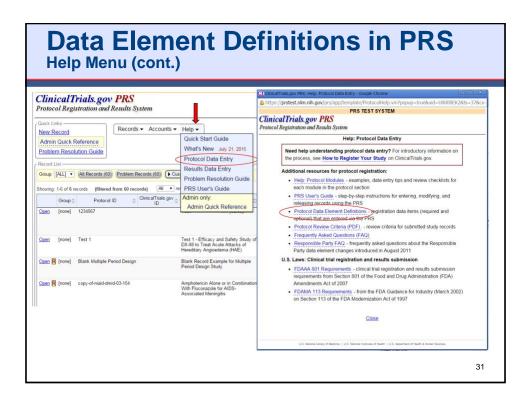
- · Data elements: pull-down menus or free text
 - Required*
 - Optional (Note: some are needed for FDAAA)
 - Indicated as FDAAA required and (FDAAA) may be required
 - Conditionally required^[*]
 - · If provide optional item, all related information must be entered
- ClinicalTrials.gov > Submit Studies > Support Materials: https://clinicaltrials.gov/ct2/manage-recs/resources
 - Protocol Data Element Definitions (DRAFT)
 - "Basic Results" Data Element Definitions (DRAFT)
 - Simple Results Templates & Data Preparation Checklists
 - · Overview of tabular format and additional explanation of data needed

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Data Element Definitions in PRS During data entry Clinical Trials. gov PRS Ora: PRSTrainingMaster User, RJW Protocol Registration and Results System Home > Record Summary > Protocol Section > Study Status Parallel Study Design Example (With Results [NCT ID not yet assigned **Edit Study Status** Help Definitions * ‡ Record Verification Date: December • Year: 2011 * ‡ Overall Recruitment Status: Completed ‡ Study Start Date: March • Year: 2010 Year: 2011 Type: Actual * ‡ Primary Completion Date: August Study Completion Date: August gust • Year: 2011 Type: Actual Final data collection date for study. * Required by ClinicalTrials.gov ‡ = FDAAA Required to comply with US FDA Amendments Act (1) = (FDAAA) May be required to comply with US FDA Amendments Act 28

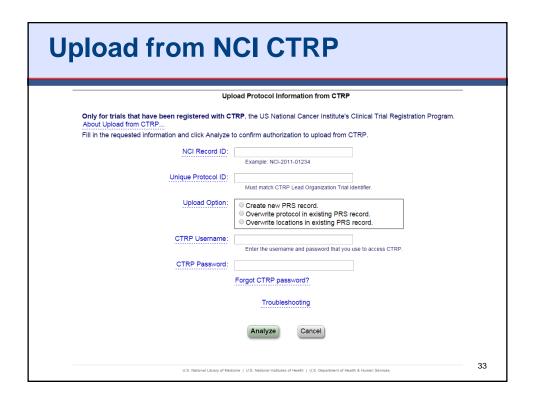






Trials Registered with NCI's CTRP

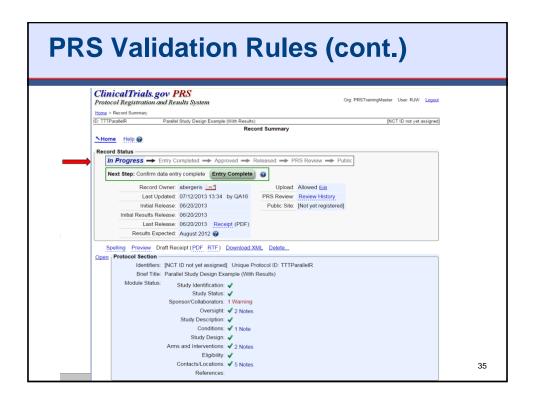
- Not automatically registered with ClinicalTrials.gov
- Upload Protocol Information from CTRP to PRS (access from PRS Main Menu > XML Upload)
- Information needed:
 - NCI Record ID
 - Unique Protocol ID
 - CTRP Username and Password
- Recommended Uses:
 - Create a new study record
 - Update locations in an existing study record

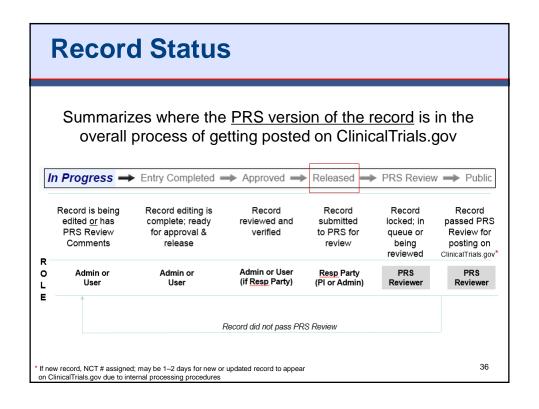


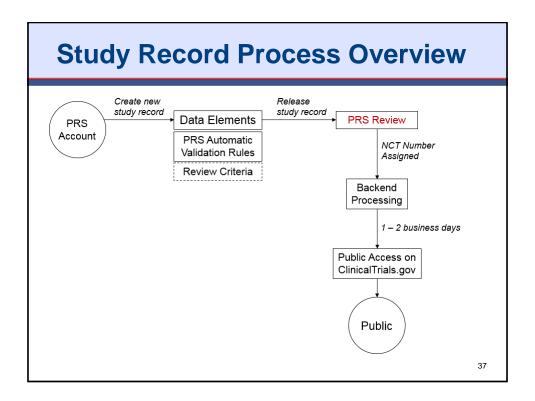
PRS Validation Rules

 A record must have <u>no Errors</u> in order for it to be submitted for posting on ClinicalTrials.gov

Туре	Explanation
ERROR	Problems that must be addressed (e.g., missing required* content, internal inconsistency)
▲ WARNING	Items that are FDAAA <u>required</u> or (FDAAA) <u>may be required</u> (e.g., Study Start Date data element)
≜ ALERT	Problems that need to be addressed
NOTE	<u>Potential</u> problems that should be reviewed and corrected, if possible (if not possible, then may ignore)







Review Criteria

- Entered protocol and results information must be consistent with review criteria applied by PRS Reviewers (ClinicalTrials.gov staff)
- · Overview of review criteria
 - Logic and internal consistency
 - Apparent validity
 - Meaningful entries
 - Formatting
- ClinicalTrials.gov Review Criteria (DRAFT)
 - Protocol: https://prsinfo.clinicaltrials.gov/ProtocolDetailedReviewItems.pdf
 - Results: https://prsinfo.clinicaltrials.gov/ResultsDetailedReviewItems.pdf

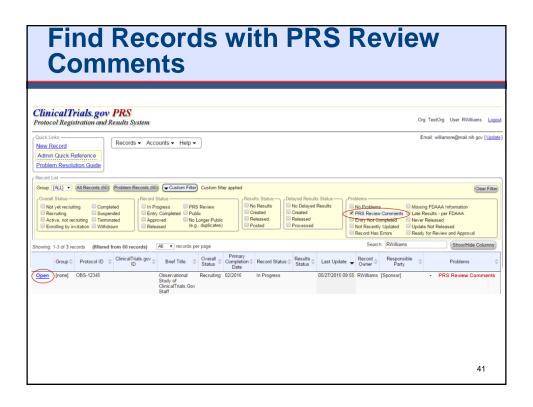
Review Comments

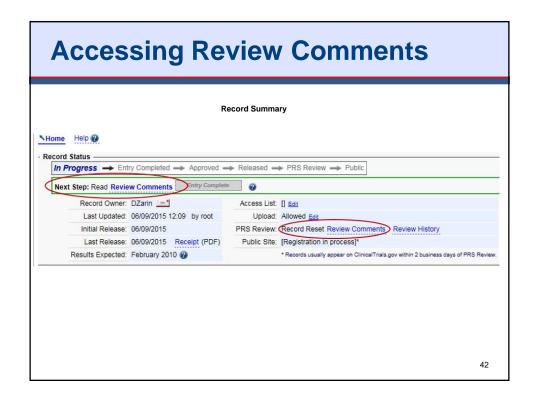
- When record "Reset", the Responsible Party and Record Owner (if different) will receive an email
- Comments can be accessed within each record with the Review Comments link

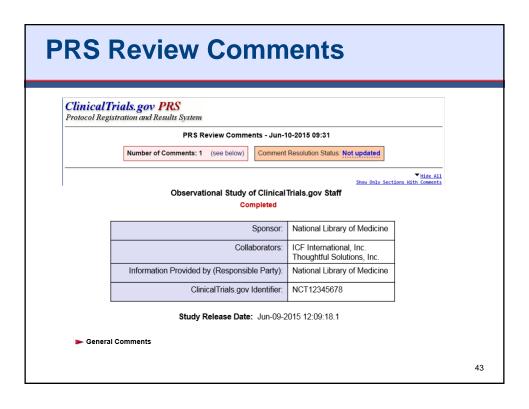
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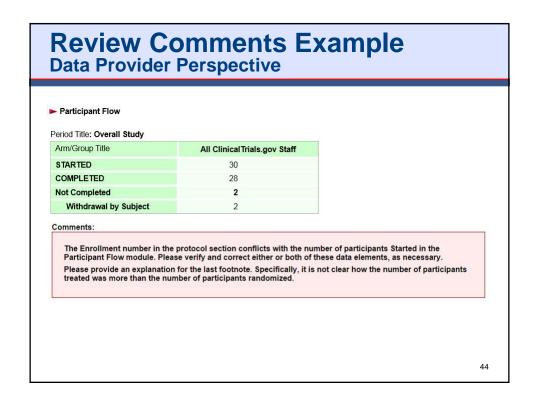
Review Comments (cont.)

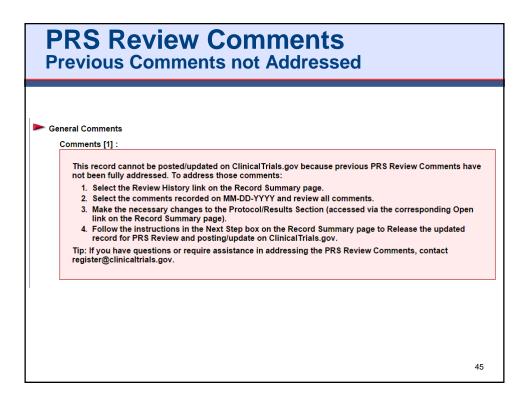
- If record reset without public posting, then major review findings must be addressed
 - Edit to address comments: Release record
- Email <u>register@clinicaltrials.gov</u> if questions on content of comments
 - Include NCT Number (or Unique Protocol ID prior to posting) and description of question with any supporting information
 - May also request teleconference

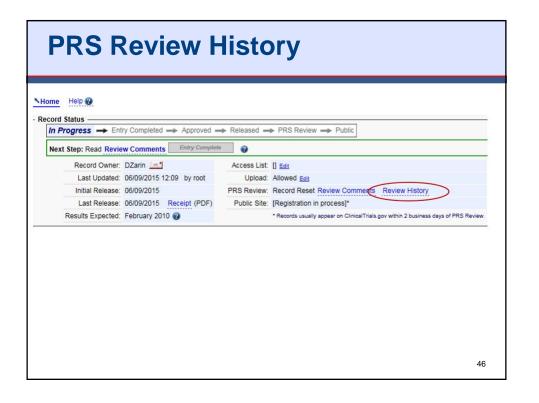


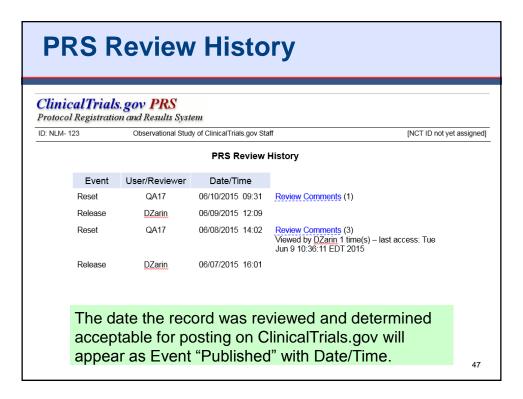












Review Comments - Protocol

- Insufficient Outcome Measures are the primary reason protocol records are reset
 - Be familiar with the Protocol Review Criteria for Outcome Measure Title, Description, and Time Frame

http://prsinfo.clinicaltrials.gov/ProtocolDetailedReviewItems.pdf

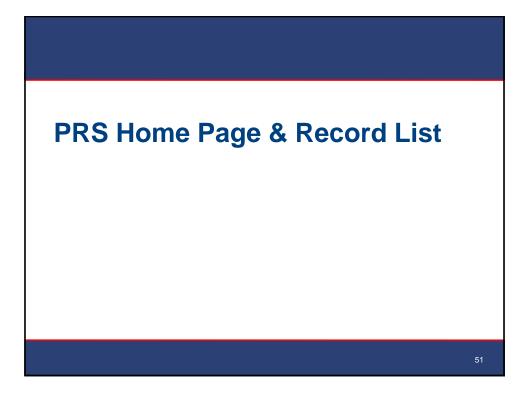
New Registrations: ClinicalTrials.gov Identifier (NCT Number)

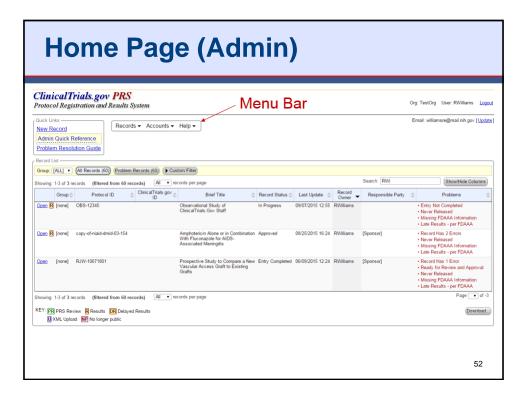
- Records should be available on ClinicalTrials.gov within 2 to 5 business days of Release
- Where to find the ClinicalTrials.gov Identifier (NCT Number)
 - Email: Sent to the Resp. Party and "Record Owner" (if different)
 - PRS Account: Appears in the "ClinicalTrials.gov ID" field
 - ClinicalTrials.gov: Search using Unique Protocol ID; the NCT Number is listed at the top and bottom of the record
- A study is not "registered" until it receives an NCT Number
 - Initial Release Date will be reported on public site
- Some studies will be "reset" without public posting
- Check your PRS Account and the public site to ensure that a study is properly registered

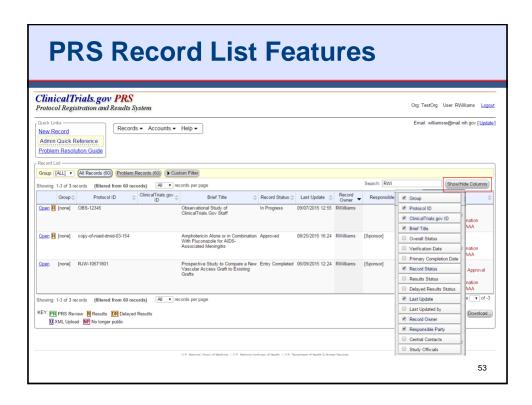
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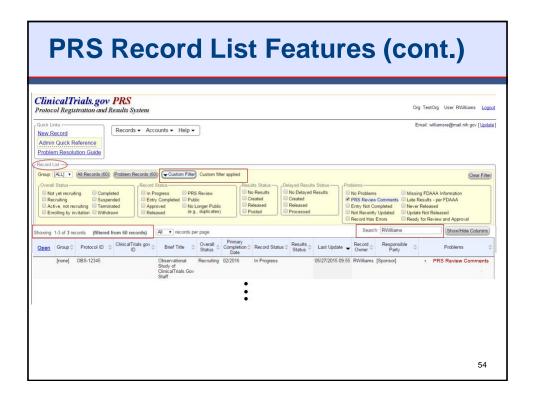
Caveats Regarding Posting at ClinicalTrials.gov

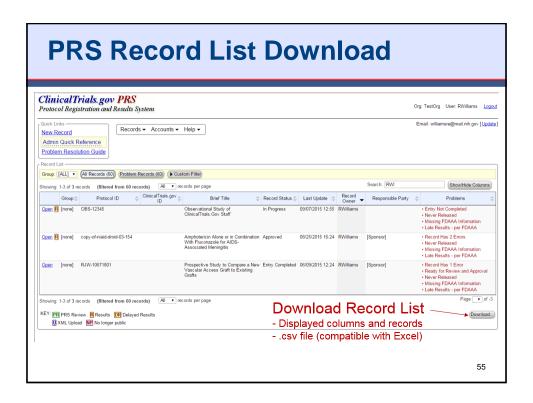
- Responsible Party must ensure that records meet review criteria
 - Responsible parties should assess their records using available review criteria prior to releasing the records
- Posting does **not** ensure that all review criteria were met
- Comments may still be provided "suggesting" improvements
- ClinicalTrials.gov may note issues and request revisions after record posted publicly

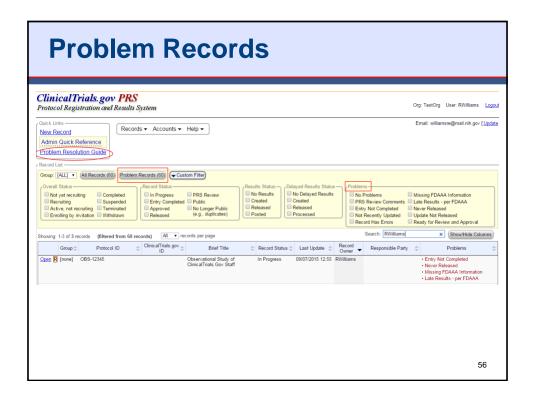












Identifying Problem Records

- Data Entry (Record Owner) Issues: e.g.,
 - PRS Review Comments that need to be addressed
 - Record(s) for recruiting studies that have not been updated or verified within the past six months.
- FDAAA 801 issues: e.g.,
 - Record(s) are missing one or more data elements required by FDAAA...
 - Record(s) appear to be overdue for results submission
- Administrator Issues: e.g.,
 - Record ready for Review and Approval
 - Update Not Released

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Problem Records – FDAAA Issues

- · For Informational Purposes Only
- Determination of whether a trial is subject to FDAAA must be made by the Responsible Party
- How do I get my trial off the report?
 - Provide all FDAAA required data elements
 - Verify accuracy of data for the following data elements:
 - Study Type, Intervention Type, Study Phase, IND/IDE Protocol?, Facility Location(s), Completion Dates Primary and Study
 - If relevant, submit results, certification or extension request
 - Note: PRS can't detect if trial includes an unapproved product.

What is an ACT?

- "Applicable Clinical Trials"* (ACTs) subject to FDAAA are:
 - Interventional studies of drugs, biologics, & devices
 - Not phase 1 (drugs/biologics), not small feasibility (devices)
 - US FDA jurisdiction (e.g., IND/IDE or US site)
 - ACTs initiated after 9/27/07 or if initiated on or before 9/27/07, "ongoing" as of 12/26/07

http://prsinfo.clinicaltrials.gov/ElaborationsOnDefinitions.pdf

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FDAAA Issues Records

- ClinicalTrials.gov Protocol Data Elements
 - Study Type [Interventional] AND
 - Intervention Type [Drug, Biologic, Device, Radiation or Genetic] AND
 - Study Phase [Not Phase 0 or Phase 1] AND
 - Facility Location(s) [At least 1 US location or locations not specified] OR IND/IDE Protocol? [Yes] AND
 - Primary Completion Date (PCD) [on or after January 2008 or not specified] <u>OR</u> Study Completion Date [on or after January 2008 if PCD not specified] <u>AND</u>
 - Overall Recruitment Status [not Withdrawn]

How to Avoid FDAAA Issues

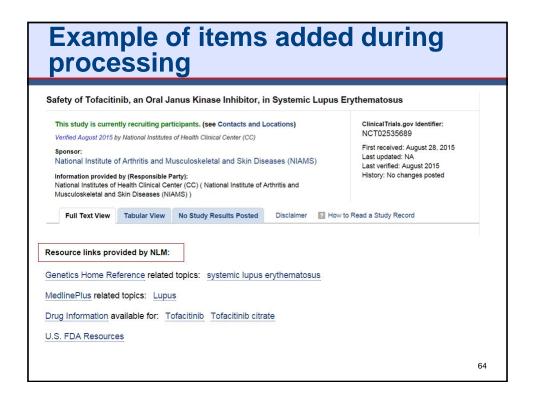
- Provide all FDAAA data elements (i.e., address all Warnings)
- Ensure data elements used to identify records with potential FDAAA Issues are properly specified
- Use Primary Completion Date to identify studies that may be due for results within the next year
 - Notify Responsible Party at regular intervals

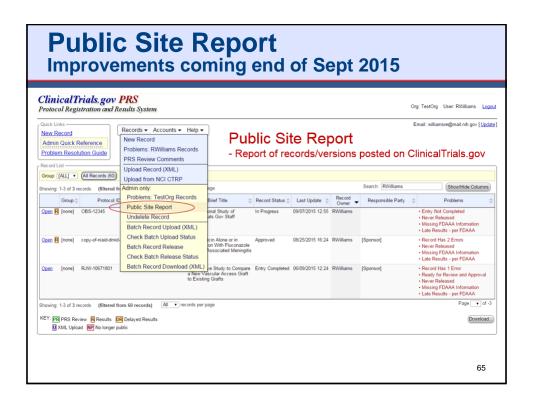
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Study Record Process Overview Create new Release study record study record Data Elements PRS Review PRS Account PRS Automatic NCT Number Validation Rules Assigned Review Criteria Backend Processing 1 – 2 business days Public Access on ClinicalTrials.gov Public







Questions?

Email register@clinicaltrials.gov at any time!