THE OHIO STATE UNIVERSITY
COLLEGE OF MEDICINE

**Managing ClinicalTrials.gov**

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## What is ClinicalTrials.gov?

A service of the National Institutes of Health (NIH), ClinicalTrials.gov is a web-based resource for patients, their families, health care professionals, researchers, and the public with access to information on publicly and privately funded clinical trials. 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.

## How to determine if a Clinical Trial or Study is an Applicable Clinical Trial (ACT)

To determine if a Clinical Trial or Study meets the criteria of an Applicable Clinical Trial (ACT), and is subject to the "expanded" registration requirements, complete the Checklist for Evaluating Whether a Clinical Trial or Study is an Applicable Clinical Trial (ACT) Under 42 CFR 11.22(b) for Clinical Trials Initiated on or After January 18, 2017.

Instructions: Answer the following questions. For additional help, refer to the accompanying "Elaboration" points by clicking on the above hyperlink.

| | |
|---|---|
| **1. Is the study interventional (a clinical trial)?**<br>*Study Type* data element is "Interventional"<br><br>*Interventional* is defined in the final rule to mean, with respect to a clinical study or a clinical investigation, that participants are assigned prospectively to an intervention or interventions according to a protocol to evaluate the effect of the intervention(s) on biomedical or other health-related outcomes. [*Source:* 42 CFR 11.10(a); 81 FR 65140-41] | ☐ Yes ☐ No |
| **2. Do ANY of the following apply (is the answer "Yes" to at least one of the following sub-questions: 2a, 2b, OR 2c)?**<br><br>**a. Is at least one study facility located in the United States or a U.S. territory?**<br><br>*Facility Location – Country* data element is "United States," "American Samoa," "Guam," "Northern Mariana Islands," "Puerto Rico," "U.S. Virgin Islands," or other U.S. territory.<br><br>**b. Is the study conducted under a U.S. FDA Investigational New Drug application (IND) or Investigational Device Exemption (IDE)?**<br><br>*U.S. Food and Drug Administration IND or IDE Number* data element is "Yes." | ☐ Yes ☐ No |

| | |
|---|---|
| **c. Does the study involve a drug, biological, or device product that is manufactured in and exported from the U.S. (or a U.S. territory) for study in another country?**<br><br>*Product Manufactured in and Exported from the U.S.* data element is "Yes." | |
| **3. Does the study evaluate at least one drug, biological, or device product regulated by the United States Food and Drug Administration (U.S. FDA)?**<br><br>*Studies a U.S. FDA-regulated Device Product* data element is "Yes" and/or<br>*Studies a U.S. FDA-regulated Drug Product* data element is "Yes." | ☐ Yes ☐ No |
| **4. Is the study <u>other than</u> a Phase 1 trial of a drug and/or biological product or is the study <u>other than</u> a device feasibility study?**<br><br>For drug product trials, *Study Phase* data element is NOT "Phase 1" and for device product trials, *Primary Purpose* is NOT "Device Feasibility." | ☐ Yes ☐ No |

**If "Yes" is answered to <u>all 4 questions</u>, <u>and</u> the study was initiated on or after January 18, 2017, the trial would meet the definition of an ACT that is required to be registered under 42 CFR 11.22.**

## <u>Creating a New User Account</u>

1. Go to https://register.clinicaltrials.gov

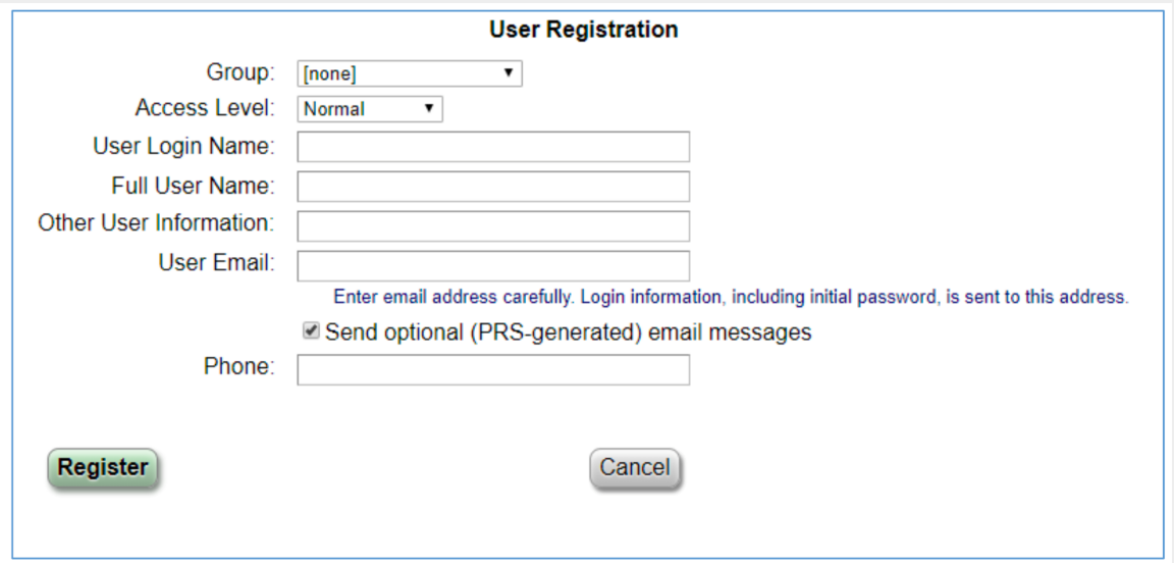
2. Click on **New User Account** from the **Admin Only** section of the Accounts menu.

3. Complete the fields on the User Registration page:

    - Access Level: Choose **Normal** for users or **Administrator**
    - Username: Enter user login name (e.g., first initial plus last name).
    - Full User Name: Enter full first name followed by last name (Note: this information will be displayed publicly when the Investigator is the Responsible Party (RP); ensure that the information is properly formatted and there are no spelling errors).
    - Other User Information: Enter additional information about the user, such as department or division (include phone number to make it easier to contact the user).

- User Email: Enter email address of user.
- Send optional (PRS-generated) email messages: This is checked by default. Administrators may uncheck to eliminate email notifications when users complete data entry for records or reset records to in-progress (not recommended).

4. Click on **Register** to accept account information and generate automatic email notification to the user of the new account.



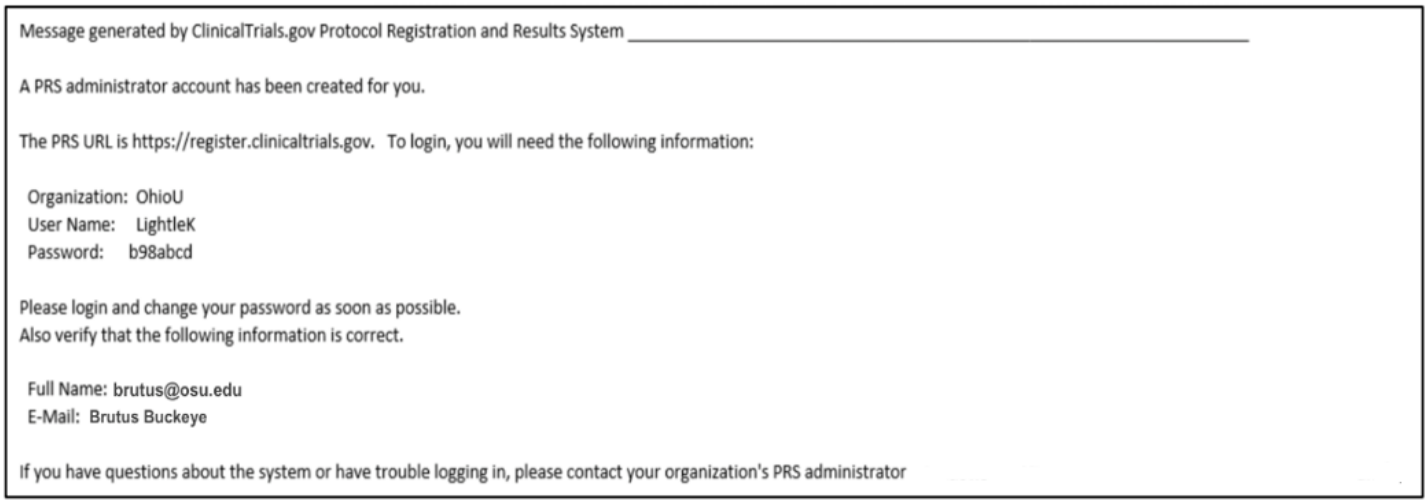

Protocol Registration System (PRS) Administrators create accounts for users in their department or division as needed, using the New User Account option from the Accounts menu at the top of the ClinicalTrials.gov PRS Home Page.

- The PRS automatically sends an email with the PRS web address and login information to the User.
- PRS Administrators have full access to all records within the organization.
- Users create and modify their own records but cannot access other users' records.
- Study investigators are provided user accounts, not Administrator accounts.

**Best Practices for Completing the Fields:**

**Group:** Choose College from dropdown
**Access Level:** Normal
**User Login Name:** Last nameFirst name initial
**Full User Name:** First name Last name
**Other User Information:** Department, job title

**User email:** osumc.edu or osu.edu email address
**Send Optional (PRS-generated) email message:** leave box checked
**Phone:** Ohio State phone number
**New user email from the PRS System:**



Message generated by ClinicalTrials.gov Protocol Registration and Results System

A PRS administrator account has been created for you.

The PRS URL is https://register.clinicaltrials.gov. To login, you will need the following information:

Organization: OhioU
User Name: LightleK
Password: b98abcd

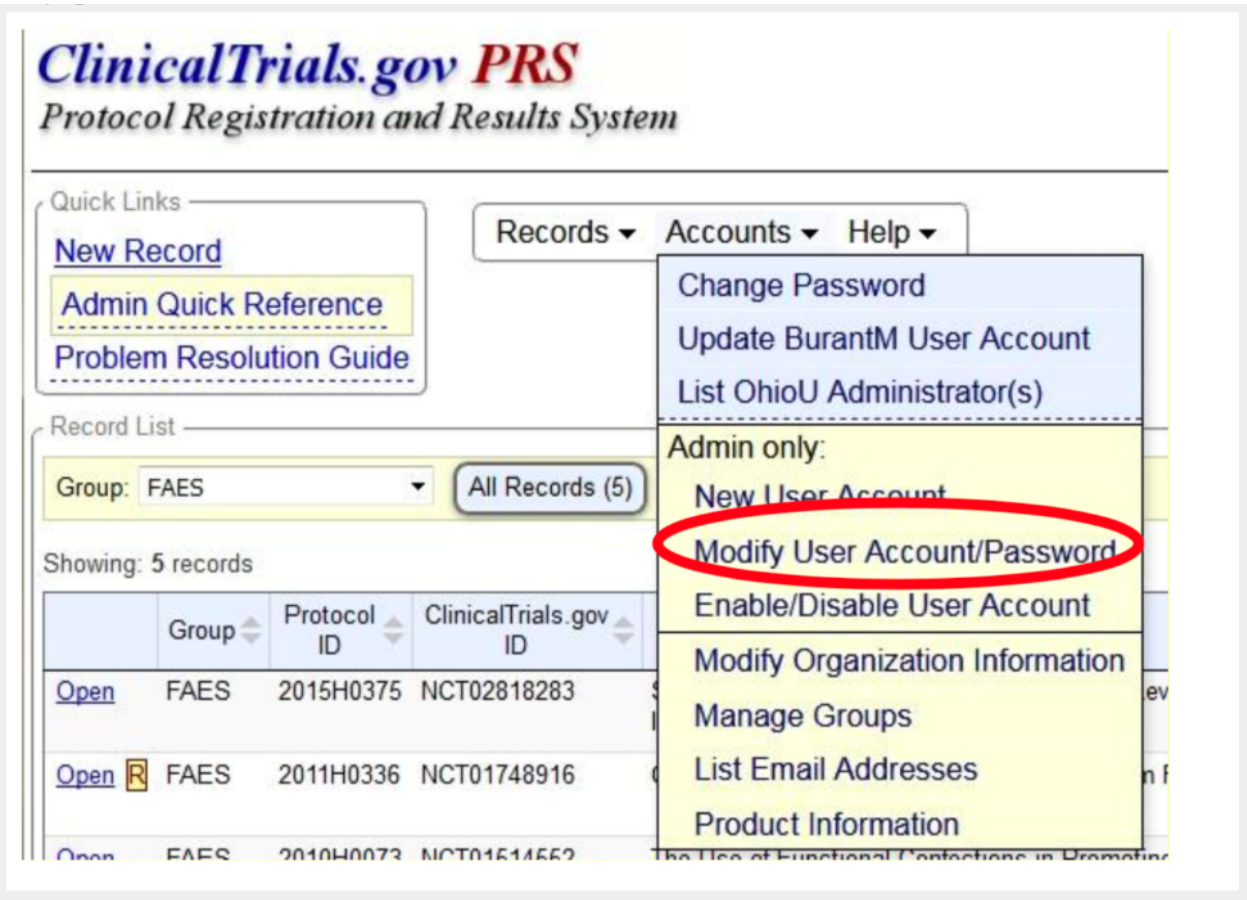
Please login and change your password as soon as possible.
Also verify that the following information is correct.

Full Name: brutus@osu.edu
E-Mail: Brutus Buckeye

If you have questions about the system or have trouble logging in, please contact your organization's PRS administrator

## Maintaining User Accounts

- Reset passwords using the Accounts menu on the Home page
- Update email addresses or make other user account modifications via the Accounts menu on the Home page
- Enable/Disable user accounts for staff that no longer need PRS access or left Ohio State




**Resetting User Password**

1. Click on Modify User Account/Password from the Admin Only section of the Accounts menu

2. Click on Reset Password next to the username for which the password is to be reset

3. Enter and confirm a new password

4. Click on Reset Password. The new password will be emailed automatically to the user

**Updating User Account Information**

1. Click on Modify User Account/Password from the Admin Only section of the Accounts menu

2. Click on Modify next to the username for the account to be updated

3. Enter changes on the User Information page

4. Click Save

**Disabling/Enabling User Accounts**

1. Click on Enable/Disable User Account from the Admin Only section of the Accounts menu

2. Click on Disable/Enable next to the username for the account to be updated

3. Click Save

**Updating Record Access List**

A Record Owner or Administrator can optionally grant access to a record, to one or more additional users within the same organization, using the Edit Access List link on the Record Summary page. Users on a record's Access List can update and edit a record. When users are added to an Access List, the record will be available through their Record List.

**Changing Record Owner (Administrators Only)**

An Administrator can change the Record Owner to another user at the same organization. To do so:

1. Select Open Record from your Record List

2. Select Change Owner in the yellow-shaded Admin Only box

3. Choose new owner's username from the list

4. Click Save

**Changing Responsible Party**

An Administrator can change the Responsible Party to another user at the same organization.

1. Open a record

2. Open Protocol Section

3. Click Edit Sponsor/Collaborator

4. Choose new Responsible Party from the list

5. Click Save

## Identifying and Resolving Problem Records

Administrators from College of Medicine Office of Research will periodically check to ensure ClinicalTrials.gov records are up to date and check for problem records. Please note, when problems occur, they usually fall into three main categories:

- Data Entry Problems
- FDAAA 801 Problems
- PRS Administrator Problems

### Data Entry Problems

Please reference the PRS User's Guide section 8.1.1 Table 3 for additional information.

| Data Entry Problems | Solution |
|---|---|
| **Pending PRS Review Comments**<br>• Potential issues were identified during PRS Review<br>• PRS Review Comments must be addressed and the record released again for the record to be processed for posting on the ClinicalTrials.gov website | **Record Owner:**<br>• Open the record and read the PRS Review Comments.<br>• Modify the record as needed to address the comments.<br>• Select **Entry Complete.**<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS). |
| **Entry Not Completed**<br>• The record has been created or modified, but it has not been marked as **Entry Complete**.<br>• A record must be marked as completed, approved, and released before it can be reviewed by PRS Staff and made public (or updated) on the ClinicalTrials.gov website. | **Record Owner:**<br>• Review the record and modify it if necessary.<br>• Select **Entry Complete**.<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** the record to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS).<br>*Note:* If the study does not need to be made public (registered) on ClinicalTrials.gov and the record has never been released, you can delete the record. |

| Data Entry Problems | Solution |
|---|---|
| **Not Recently Updated**<br>• The record has not been recently updated.<br>• This applies only to active studies, with an Overall Recruitment Status other than Completed, Terminated, or Withdrawn.<br>• A record must be updated at least once every 12 months, and some data elements must be updated sooner (e.g., within 30 days of a change) based on the requirements in Section 801 of FDAAA and 42 CFR 11.64. | **Record Owner:**<br>• Review the record for accuracy and modify it as needed.<br>• Update the Verification Date.<br>• Select **Entry Complete**.<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS).<br>*Note:* This problem will continue to be listed for the record until the updated record has been released and PRS Review has concluded. |
| **Record Has Errors**<br>• The record has one or more error messages.<br>Note that errors can arise due to the passage of time (for example, anticipated Primary Completion Date in the past). | **Record Owner:**<br>• Modify the record as needed to address the errors.<br>• Select **Entry Complete**.<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS). |

**FDAAA 801 Problems**

Please reference the PRS User's Guide section 8.1.2 Table 4 for additional information.

| FDAAA 801 Problem | Solution |
|---|---|
| **Missing FDAAA Information**<br>• The record is missing one or more data elements required by FDAAA 801 (Responsible Party, Study Start Date, Primary Completion Date, and/or Primary Outcome Measure). | **Record Owner:**<br>• Review the record and modify it as needed, ensuring that all WARNING messages have been resolved.<br>• Select **Entry Complete**.<br>**Administrator/Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to |

| | |
|---|---|
| | ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS). |
| **Late Results—per FDAAA**<br>• The record appears to be overdue for results submission per FDAAA 801 or 42 CFR Part 11. | **Administrator/Responsible Party:**<br>• Determine whether:<br>  ○ Results are required to be submitted; or<br>  ○ It is appropriate to submit a Certification or Extension Request to delay results submission.<br>For more information, read When Do I Need to Register and Submit Results?<br>• Identify the appropriate individual within the organization to enter results information for the study. If necessary, create a User account for the individual and change record ownership (or update the record's Access List).<br><br>**If You Are Ready to Report Results:**<br>**Record Owner:**<br>• If submitting results information for the first time, refer to the Results Data Entry from the Help section of the PRS main menu for the full set of instructional resources.<br>• Enter results information using the **Enter Results** link on the Record Summary page.<br>• Select **Entry Complete**.<br><br>**Administrator/Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS).<br><br>**To Request Certification or an Extension:**<br>**Administrator/Responsible Party:** |

| | |
|---|---|
| | Identify the appropriate individual within the organization to enter a Certification or Extension Request. If necessary, create a User account and change record ownership (or update the record's Access List).<br>**Record Owner:**<br>• Enter Certification or Extension information using the **Delay Results** link on the Record Summary page.<br>• Select **Entry Complete**.<br>**Administrator/Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS).<br>*Note:* This problem will continue to be listed for the record until results information is posted without Major Comments. |

| FDAAA 801 Problem | Solution |
|---|---|
| **Incomplete Results—per FDAAA**<br>• The record appears to be missing secondary outcome measure results information per FDAAA 801 or 42 CFR Part 11. | **Administrator/Responsible Party:**<br>• Identify the appropriate individual within the organization to enter results information for the study. If necessary, create a User account for the individual and change record ownership (or update the record's Access List).<br>**If You Are Ready to Enter Additional Results Information:**<br>**Record Owner:**<br>• Enter additional results information by opening the Results Section from the Record Summary page and opening the relevant module that needs updating.<br>• Select **Entry Complete**.<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review |

| | |
|---|---|
| | (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS).<br>*Note:* This problem will continue to be listed for the record until results information is posted without Major Comments |

**PRS Administrator Problems**

Please reference PRS User's Guide section 8.1.3 Table 5 for additional information.

| PRS Admin Problem | Solution |
|---|---|
| **Ready for Review and Approval**<br>• A user has marked a record as **Entry Complete** following the initial data entry or modification of the record. The record is ready to be approved and released for PRS Staff review and to be made public on the ClinicalTrials.gov website. | **Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS). |
| **Never Released**<br>• A record has been created but has never been released.<br>• A record must be marked as completed, approved, and released before it can be reviewed by PRS Staff and made public (or updated) on the ClinicalTrials.gov website. | **Administrator/Responsible Party:**<br>• Determine whether the study should be posted on ClinicalTrials.gov and who should finish data entry.<br>• Change record ownership or update the record Access List, if necessary.<br>**Record Owner:**<br>• Finish initial data entry or update the record, as appropriate.<br>• Select **Entry Complete**.<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS).<br>*Note:* If the study does not need to be registered and posted on ClinicalTrials.gov, and the record has never been Released, delete the record (see Section 7.6: Deleting a Record or Results Section) |

| | |
|---|---|
| **Update Not Released**<br>• A record that has been posted on ClinicalTrials.gov has been updated, but the update has not been released.<br>• A record must be marked as completed, approved, and released before it can be reviewed by PRS Staff and made public (or updated) on the ClinicalTrials.gov website. | **Administrator/Responsible Party:**<br>• Determine who should finish updating the record.<br>• Change record ownership or update the record Access List, if necessary.<br>**Record Owner:**<br>• Review and update the record, as appropriate.<br>• Select **Entry Complete**.<br>**Responsible Party:**<br>• Review and edit as needed.<br>• Select **Approve** and **Release** to submit the record to ClinicalTrials.gov for PRS Review (see Section 5: Preparing, Approving, and Releasing a Study Record to PRS). |

## Resources

**Civil Money Penalties Relating to the ClinicalTrials.gov Data Bank**
https://www.fda.gov/media/113361/download

In August 2020, FDA released *Guidance for Responsible Parties, Submitters of Certain Applications and Submissions to FDA, and FDA Staff* regarding financial penalties against those who violate implementing regulations in 42 CFR Part 11, to submit clinical trial registration and/or results to the ClinicalTrials.gov data bank and/or certain certifications to FDA. Violations not corrected within 30 days following a notification may be fined up to $13,237 (adjusted in 2022 for inflation) each day until the violation is corrected. Civil money penalties may also be assessed for submitting false or misleading information to the ClinicalTrials.gov data bank, or knowingly submitting a false certification to FDA.

**Clinical Trials Registration and Results Reporting Taskforce**
https://ctrrtaskforce.org/

The Clinical Trials Registration and Results Reporting Taskforce is a national consortium of members of academic medical centers, universities, hospitals, and non-profit organizations focused on the implementation of domestic clinical trials registration and results reporting requirements in the ClinicalTrials.gov public repository. The objectives of the group are to identify best practices, develop solutions and tools for regulatory support and investigators, and serve as a communication forum.

The taskforce website has publicly available resources. Joining the taskforce allows members to access additional materials in DropBox Paper and a listserv. To join the Taskforce, complete the membership form on their website.

**Protocol Registration and Results System (PRS) Guided Tutorials**
https://prsinfo.clinicaltrials.gov/tutorial/content/index.html#/

Include Quick Overview Guides, Registration Tutorials, Study Documents Tutorial, Results Tutorials, PDF Library

**Collaborative Institutional Training Initiative (CITI) ClinicalTrials.gov Registration and Results Summary Disclosure in ClinicalTrials.gov**
https://www.citiprogram.org/

This course provides a video-enhanced guide to compliance with the FDAAA Final Rule and NIH Policy on clinical trial disclosure in ClinicalTrials.gov. The course guides learners through critical parts of the regulations and provides a step-by-step guide to data entry, thus helping organizations avoid the risk of significant civil monetary penalties or loss of NIH grant funding. Ohio State does not subscribe to this course, and as such, there is an independent learner fee associated.

**Center for Clinical and Translational Science (CCTS)**
https://ccts.osu.edu/

The Center for Clinical and Translational Science at Ohio State maintains several helpful documents on their website for information for ClinicalTrials.gov PRS Administrators and investigators.

**Office of Responsible Research Practices (ORRP)**
https://orrp.osu.edu/

The Office of Responsible Research Practices at Ohio State provides information regarding registration requirements for ClinicalTrials.gov. Additionally, there are informed consent templates available which include the language required by FDA regulations.

## Definitions

**Applicable Clinical Trial (ACT)** Under the Final Rule, which implements Section 801 of the Food and Drug Administration Amendments Act (FDAAA 801), two types of ACTs are defined:

- 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 (FD&C 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 pediatric postmarket surveillance of a device product as required under section 522 of the FD&C 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. [Source: 42 CFR 11.10(a); 81 FR 65139].

- 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 FD&C Act (21 U.S.C. 355) or a biological product subject to section 351 of the Public Health Service Act (PHS 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, if it meets all other criteria of the definition under this part. [Source: 42 CFR 11.10(a); 81 FR 65139]

**Food and Drug Administration Amendments Act Section 801 (FDAAA 801) of 2007**- Amended section 402(j) of the Public Health Service (PHS) Act to require that a “Responsible Party” submit clinical trial registration and results information to the ClinicalTrials.gov Registry Data Bank for certain “applicable clinical trials.” The section also requires a submitter to certify to FDA that all requirements of section 402(j) have been met when submitting certain applications and submissions to FDA regarding drug products, biological products, and device products.

**Problem Records**- Records that may have issues with data entry errors or FDAAA 801. They may have not been updated recently or have missing information. FDAAA results may be late, incomplete, or missing information.

**Protocol Registration and Results System (PRS) Administrator/Administrator**- Individual designated by the organization to manage the organization's PRS account, create accounts for users, and serve as the point of contact for PRS Staff. All PRS organization accounts should have at least one Administrator who creates user accounts and oversees the maintenance of the organization's records. When the Sponsor is the Responsible Party, Administrators are responsible for releasing records for PRS Review and posting to ClinicalTrials.gov.***** At Ohio State, this may be a department administrator, administrative managers, grants and contracts administrators, or directors.

*Note: At Ohio State, the RP releases the record, not the Administrator(s). In rare cases where an RP leaves Ohio State without closing or transferring the study and is unable to

correct a problem record for which they are the RP, removing the RP for an Administrator to correct a problem record is the only way the record can be released for PRS review.

**Record Owner**- PRS account holder who creates a study record in the PRS**.** Record Owners can maintain the record themselves or give one or more users access to a record to make changes. An Administrator can change the Record Owner after the record has been created. At Ohio State, record owners are often research coordinators, co-investigators, or the Principal Investigator (PI) of the protocol.

**Responsible Party (RP)**-FDAAA 801 and NIH state that the entity or individual responsible for registering a clinical investigation and submitting clinical trial Information to the ClinicalTrials.gov Registry Data Bank is known as the Responsible Party. The Responsible Party for a particular study may be the Sponsor (as defined in section 50.3 of Title 21, Code of Federal Regulations (or any successor regulation), Sponsor-Investigator, or Principal Investigator if so designated by a Sponsor, grantee, contractor, or awardee, so long as the Principal Investigator 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, and has the ability to meet all of the requirements (under the regulation) for the submission of clinical trial information. When the Responsible Party is the Sponsor, an Administrator performs these record functions. The person identified as the Responsible Party for the Sponsor Organization account acts as the official contact person for that account and full contact information for that person must be listed in the PRS account. At Ohio State, the PI should be listed as the Responsible Party.

**Sponsor Organization**- A company, university, medical center, or other research organization that conducts clinical trials. Each study record has a Sponsor Organization, and all PRS accounts associated with that record should be under the Sponsor Organization. Investigators apply to be users of the Sponsor Organization's PRS account. (If an investigator is conducting trials for more than one Sponsor Organization, he or she will need an account from each of those organizations to register the studies properly.)

**User**- Any PRS account holder who is authorized to enter information into the PRS, including investigators or research assistants. Users create and modify their own records but cannot access other users' records unless authorized by the Record Owner or by an Administrator.