Keeping Up with ClinicalTrials.gov: A Systematic Approach in Maintaining Compliance

Cheryl Forst, RN, BSN, CCRP, Niem-Tzu "Rebecca" Chen, MS, MEd, CCRP, Paula Bistak, DMH, RN, MS, CIP, CHRC
Office of Research Regulatory Affairs (ORRA), Rutgers, The State University of New Jersey

PURPOSE

Recent regulatory, scientific, and ethical considerations have made timely and complete clinical trial registration and data reporting an institutional imperative. The Research Administration at Rutgers, The State University of New Jersey, recognized there was no centralized mechanism for monitoring compliance for clinical trials registration and results reporting. Through their Human Subject Protection Program (HSPP), Rutgers has taken a proactive approach to identify key issues and facilitate investigator compliance with reporting requirements.

METHODS

Key to Rutgers success in improving registration and reducing their reporting problem list have been increased awareness and making the process easier for investigators. This was done by the following mechanisms:

Managing clinical trials registration through its HSPP, Rutgers has:

A. Identified a point person to assist investigators
B. Initiated a mechanism to identify clinical trials at Rutgers
C. Created a user-friendly website
D. Worked with Research Administration to create policy and procedures for registration and data entry
E. Provided active outreach to investigators and staff, offering education and timely information
F. Acted as a liaison between investigators and ClinicalTrials.gov Team in NIH

A. Identify a Point Person to Assist Investigators in Your Organization

Who does this position(s) fall under at your institution?
How are you funding this position(s)?
Explore options on the ClinicalTrials.gov Protocol Registration System (PRS) Administrator support by considering the following:

1. Full Time Employee (FTE)
2. Funding Source
3. Chain of Command

Rationale and Advantages of Having PRS Administrator Role in the Human Subjects Protection Program (HSPP)

1. Clinical trials registration and results reporting is a Human Subjects Protection (HSP) issue.
2. The position aligns with the Declaration of Helsinki paragraph 35 and 36 (updated October 2013) *"All study results inconclusive, negative or positive be made public"*
3. HSPP has the access to IRB study database which enables internal monitoring and management.
4. HSPP PRS Administrator conducts quality assurance review of protocols newly registered on ClinicalTrials.gov.
5. Ability to monitor non-compliance with Federal Regulation

B. Initiate a Mechanism to Identify Clinical Trials and Facilitate Registration

Mechanisms in place at Rutgers Institutional Review Board

- eIRB application questions (Fig. 1) on investigators to self report
- IRB changed the protocol templates to distinguish "interventional studies" and "non-interventional studies"

Mechanisms in place at Human Subjects Protection Program

- PRS Administrator generates a monthly report from eIRB of newly IRB-approved studies to capture interventional studies required to register on ClinicalTrials.gov

(Fig. 1) Rutgers Intuitional Review Board provides research faculty with eIRB Questions that prompts the investigator to register his trial on ClinicalTrials.gov

- **Is this a Research Study which prospectively assigns human participants or groups of humans to one or more health related interventions to evaluate the effects on health outcomes?**
  Yes / No
- * **Is this a clinical trial** defined as an Interventional trials (drugs, biologics, device), Phase II-IV , device trials for which FDA approval is sought(IND/IDE)?
  Yes / No

If YES:

- You have indicated that this is a Clinical Trial or a research study which prospectively assigns human participants or groups of human participants to one or more health related interventions. This requires ClinicalTrials.gov **registration** per FDA Regulations and/or ICMJE Registration Policy. This study must be registered at ClinicalTrials.gov within **21 days** of enrollment of the first participant.
  Requirements: http://rbhs.rutgers.edu/hsweb/clinicaltrials/requirements.html
  ICMJE Registration Policy: http://rbhs.rutgers.edu/hsweb/clinicaltrials/icmje.html
- **Please select all classifications that apply:** (phase of the study)
- **Identify your ClinicalTrials.gov point person of your study:** (include name and contact information)

C. Create a User-Friendly Website:

Established a website of clinical trials registration and results reporting and regularly update it.

D. Work with Research Administration to Create Policy and Procedures for Registration and Data Entry

Ad hoc committee met with the Institutional Officer to discuss details of policy and procedures, including enforcement for registration and data entry.

E. Provide Active Outreach and Education

Education and training was provided through numerous outreach activities

❖**Education and Training** of research faculty and staff is critical for compliance with ClinicalTrials.gov requirements. HSPP has offered extensive opportunities for education and training that is specially tailored to meet individual and/or group needs.

- **Rollout Sessions** were given at all Rutgers campuses.
- **All IRB Executive Committees** received an introductory session.
- **Department or Group Meetings** are encouraged to include a presentation of ClinicalTrials.gov on the agenda.
- **Personalized Tutoring/Meetings** are conducted with individual faculty and their staff.
- **Individual Phone Consultations** are available upon request.
- **IRB Open House** had a ClinicalTrials.gov information table, next to our ClinicalTrials.gov poster.

Educational sessions were provided for the research faculty on federal regulations and ICMJE requirements

- The Trial is an Applicable Clinical Trial, or ACT, per FDAAA 801 (includes clinical studies with no external sources of funding).
- The Trial is Funded (*fully or partially*) by the National Institutes of Health (NIH).
- The Principal Investigator Plans to Publish in an International Committee of Medical Journal Editors (ICMJE) Member Journal.
- The Trial is a Qualifying Clinical Trial Which will Render Claims for Items and Services from the Centers for Medicare and Medicaid.

International Committee on Medical Journal Editors requirements for result reporting if investigators intend to publish

The ICMJE clinical trial registration policy requires public, prospective registration in an acceptable public registry or in the World Health Organization (WHO) International Clinical Trials Portal. However, by the conditions set forth by FDAAA 801, registration of a clinical trial on ClinicalTrials.gov requires the posting of summary results data. It is important to understand that ICMJE requires Principal Investigators to adhere to the registration guidelines of the chosen registry. The HSPP ...

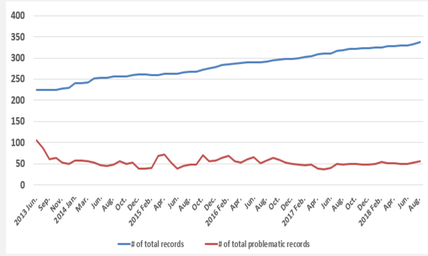
- provides ClinicalTrials.gov tools for data collection in preparation for manuscripts.
- explores investigators intent to publish
- familiarizes investigators with the ICMJE registration timeline for enrolling participants.
- provides guidance for investigators to meet ICMJE reporting requirements.

F. PRS Administrator's Expanded Role in Maintaining Compliance

- Participate in Clinical Trials Registration and Results Reporting Taskforce, a nation-wide consortium joined by institutional PRS administrators. Activities include monthly conference calls and various subcommittees to collaborate on projects and issues.
- Open communication with ClinicalTrials.gov PRS Team at National Institutes of Health
- Identify and share best practices with other institutions; develop solutions and tools for regulatory support and investigators
- Respond to requested consultations with from around the country
- Expand intuitional knowledge with Taskforce updates

RESULTS

- Developed and implemented an Institutional Policy and Procedure approved by the Institutional Official and Vice President of Research
- Initiated collaboration with other departments to develop in-house procedures for the institution to maintain in compliance (e.g. investigators separation procedure)
- Increased research faculty awareness on registration and result reporting
- Run monthly reports in ClinicalTrials.gov to check for compliance with institutional policy
- Human Subject Protection Analysts now review and include a section on the obligation and responsibility of clinical trials registration and results reporting when conducting in-house Quality Assurance, Routine and For-cause Reviews.



Rutgers increasing the number of registration and reducing the number of records on the problem list.

CONCLUSION

- Besides a major increase in registration, data reporting, and a reduction in problem items, investigators now view HSPP as a valuable resource not merely a compliance overseer.
- *"Results reporting should not be considered a burden. Reporting results is an essential part of the scientific process; it is an integral component of the scientific method." (Michael S. Lauer, MD, Extramural Research, NIH)*