ClinicalTrials.gov PRS – How to Register and Maintain a Record

IRB Compliance Program

PRS Administrator, Brian Brotzman

Human Subjects Office/Institutional Review Board

Overview

- Purpose
- Rules and Regulations
- PRS and IRB
- Record Owner vs Responsible Party
- Registration
- Creating a Record
- Review
- Updating a Record
- Questions

Purpose

Trial Registry Purposes for Various Groups

Registry Purpose	Group That Benefits
Fulfill ethical obligations to participants and the research community	Patients, the general public, the research community
Provide information to potential participants and referring clinicians	Patients, clinicians
Reduce publication bias	Users of the medical literature
Help editors and others understand the context of study results	Journal editors, users of the medical literature
Promote more efficient allocation of research funds	Granting agencies, the research community
Help institutional review boards (IRBs) determine the appropriateness of a research study	IRBs, ethicists

Source: Zarin DA, Keselman A. Registering a clinical trial in ClinicalTrials.gov. *Chest*. 2007;131(3):909-12. [Full Text]

Results Database Purposes for Various Groups

Results Database Purpose	Group That Benefits
Provide a public record of basic study results in a standardized format	Researchers, journal editors, IRBs, ethicists
Promote the fulfillment of ethical obligations to participants and the overall contribution of research results to medical knowledge	Patients, the general public, the research community
Reduce publication and outcome reporting biases	Users of the medical literature
Facilitate systematic reviews and other analyses of the research literature	Researchers, policymakers

Source: Tse T, Williams RJ, Zarin DA. Reporting "basic results" in ClinicalTrials.gov. *Chest*. 2009;136(1):295-303. [Full Text]

Rules and Regulations

- Federal Regulations
  - FDAMA, FDAAA 801, 42 CFR 11

IT'S THE LAW!!

Penalties –
- Fines of up to $11,383/day
- Withholding of funding to the PI and the institution
- Potential criminal penalties

- NIH regulations
  - Revised definition of a clinical trial (includes behavioral interventions)
  - Required for all NIH-funded clinical trials
- International Committee of Medical Journal Editors (ICMJE)
  - Similar to NIH definition.
  - Must register prior to enrolling the first subject
  - Must include IPD (Individual Participant Data) sharing statement

Protocol Registration and Results System (PRS) and IRB

The University of Iowa

- register.clinicaltrails.gov
- Online system for entering data to be published on the public site
- PRS training
- IRB reviews
- hso.research.uiowa.edu

Record Owner vs Responsible Party

Record Owner – Person responsible for entering data in record

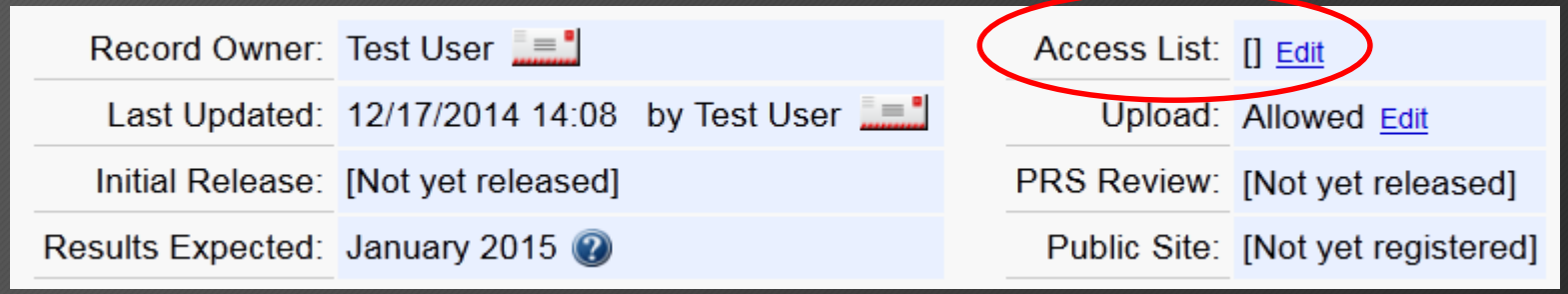
- Not legally responsible for the content of the record

Responsible Party (Sponsor) – Person or entity initiating the clinical trial and responsible for the contents of the ClinicalTrials.gov record

- Is required by law to create, maintain, and monitor from beginning to end
- Significant penalties if found in non-compliance

Record Owner Responsibilities

- You are responsible for maintaining the study records associated with your account
- When you enter information about the study, please ensure the information is correct, readily understood by the public, and updated in a timely manner
- Only one owner can be assigned to a study record, but the owner can also allow other users to edit the study record
- Use the Access List



Responsible Party Responsibilities

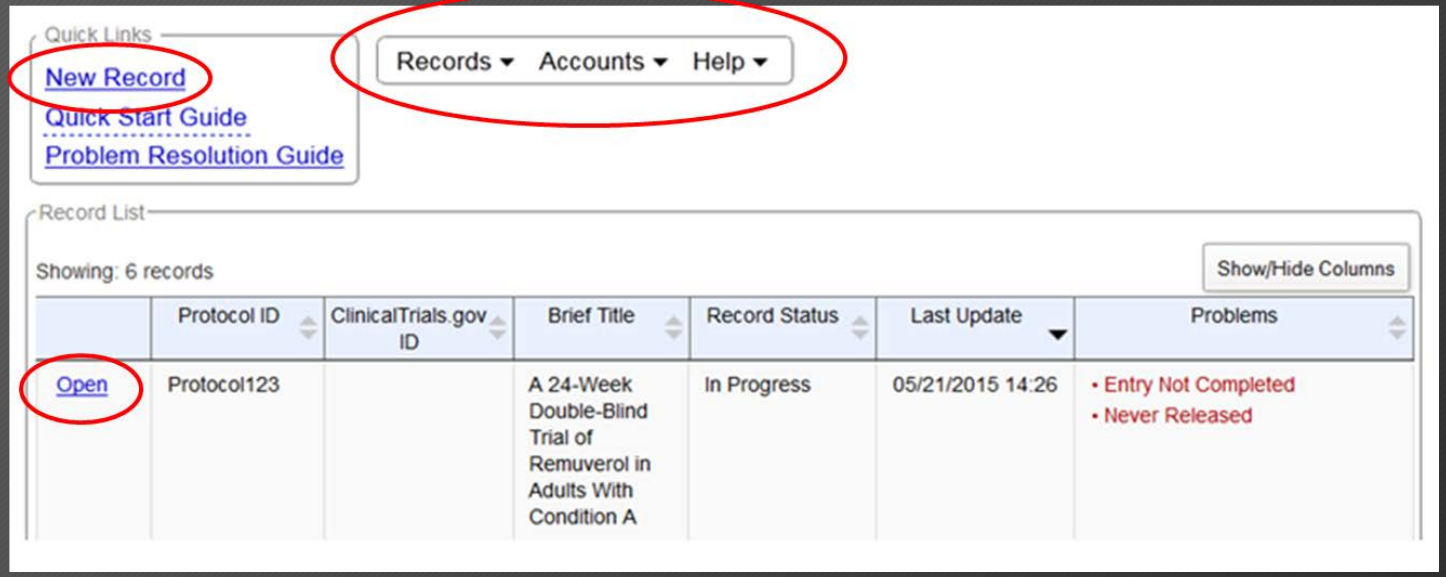
- Responsible for ‘Approving’ and ‘Releasing’ the record
- Assure that deadlines are met
- Verify that content is complete and accurate
- May also be the Record Owner

Registration Information

- Description of study
  - Study type, Phase, Design, Outcome measures
- Recruitment information
  - Eligibility criteria, locations, recruitment status
- Administrative and other information
  - Key dates and contact information
- Helpful links to add
  - MEDLINE publications, consumer health information, FDA information

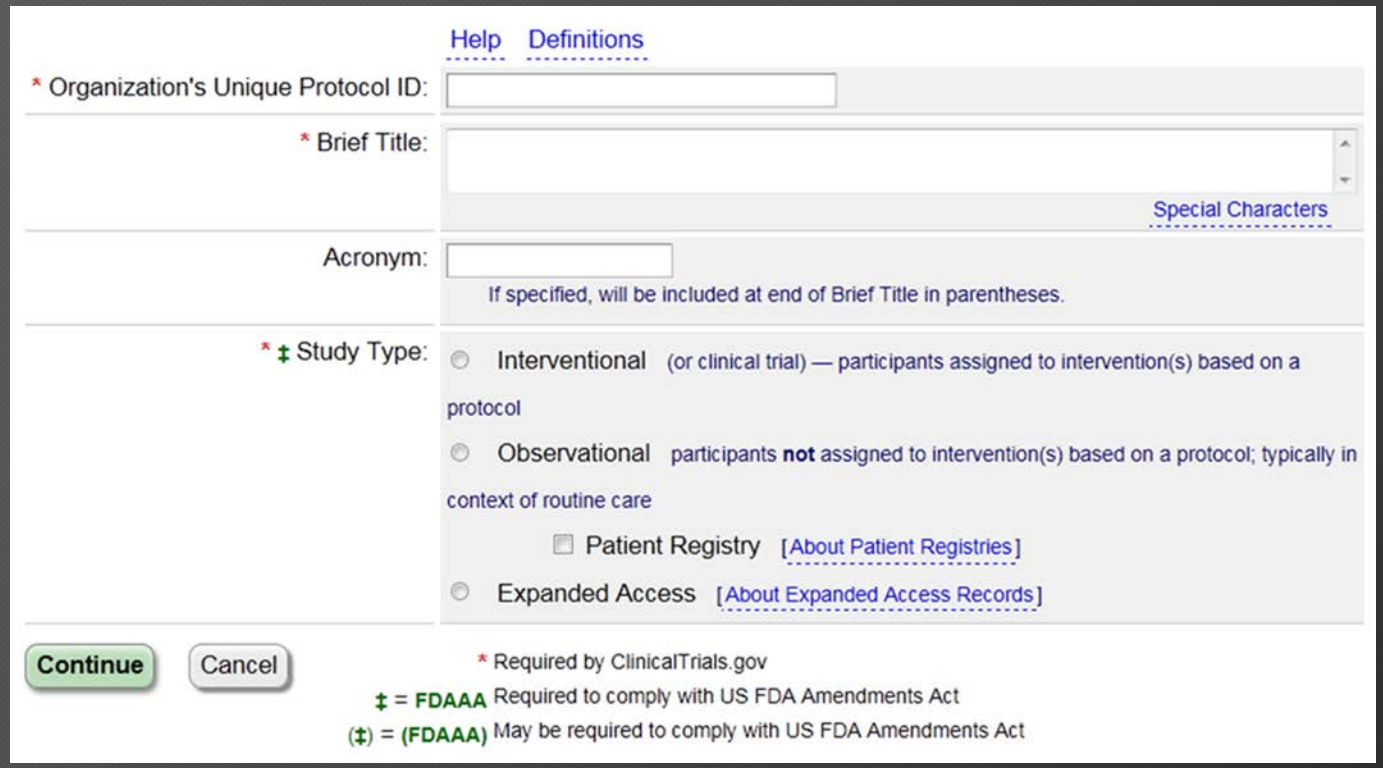
Creating a Record

- Email PRS administer to create an account ct-gov@uiowa.edu
- Login
  - Organization: uiowa
  - Username: hawkid
  - Password: you set, but PRS admin can reset, if needed
- Help and User Guides



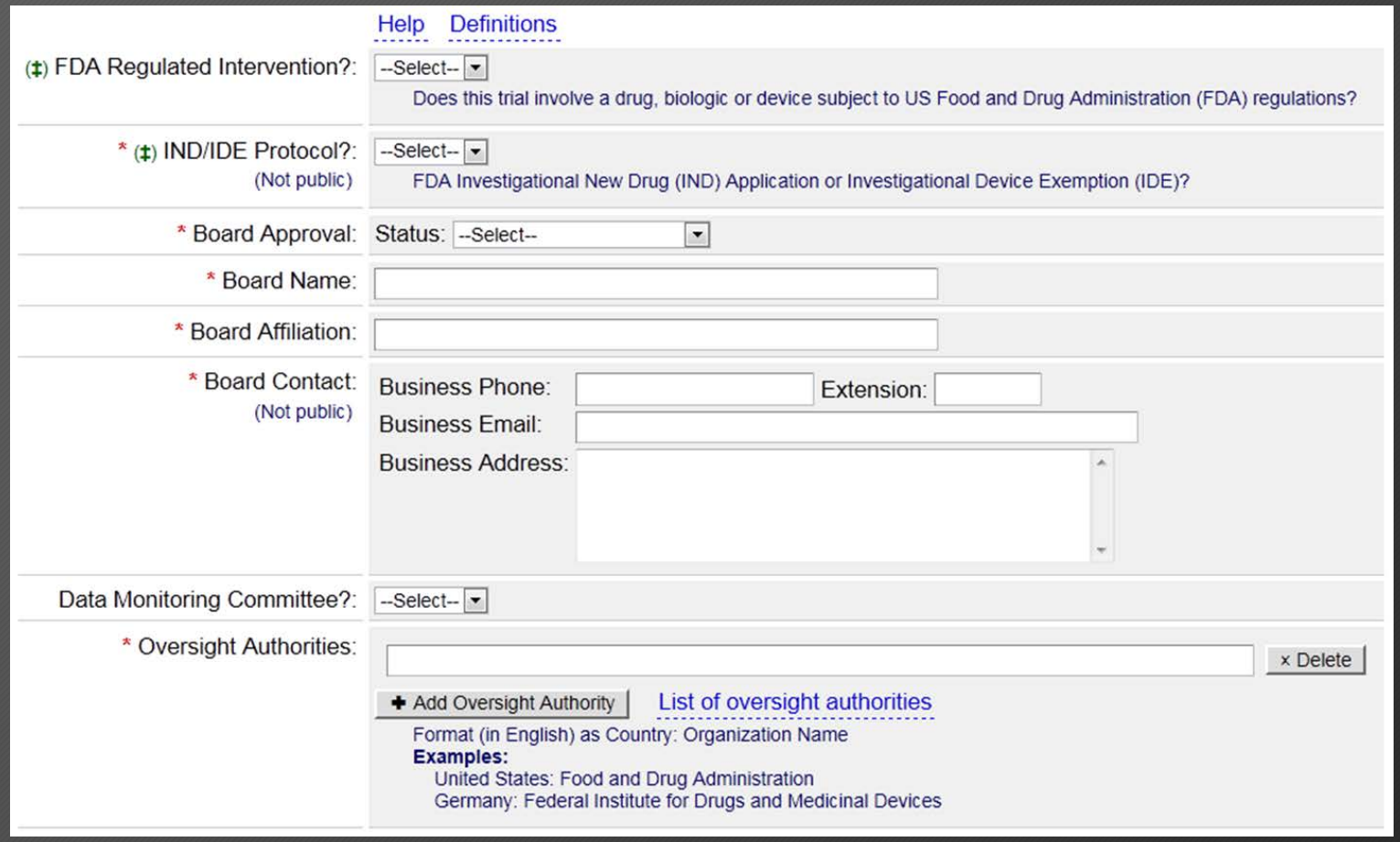
Getting Started

- The ‘Unique Protocol ID’ must list the HawkIRB number (digits only)
- Brief title – Layman’s terms



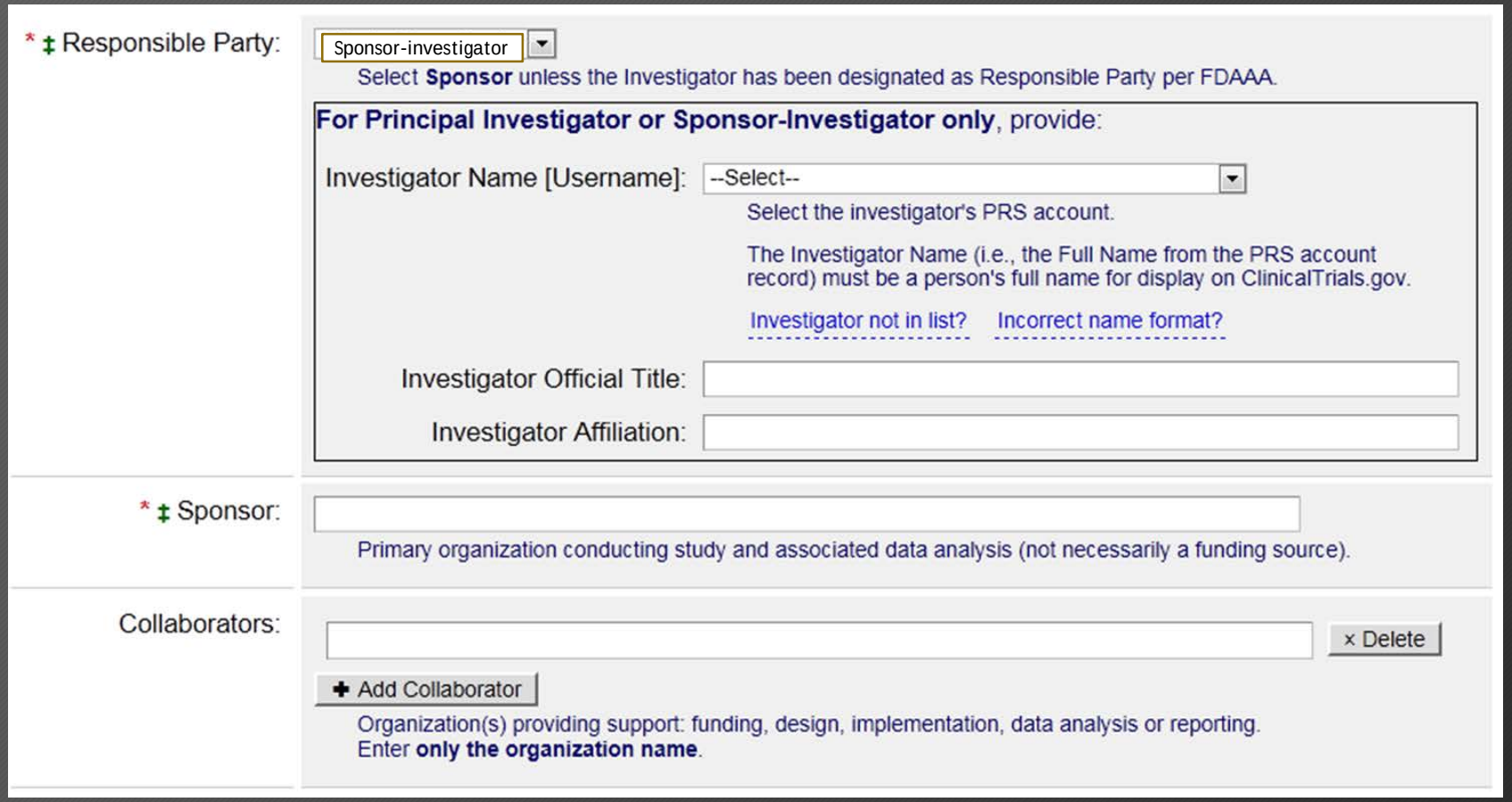
IRB Board Approval

- Contacts should list research investigators, not IRB or administrative contacts unrelated to the trial
- University of Iowa IRB 01, irb@uiowa.edu, 319-335-6564



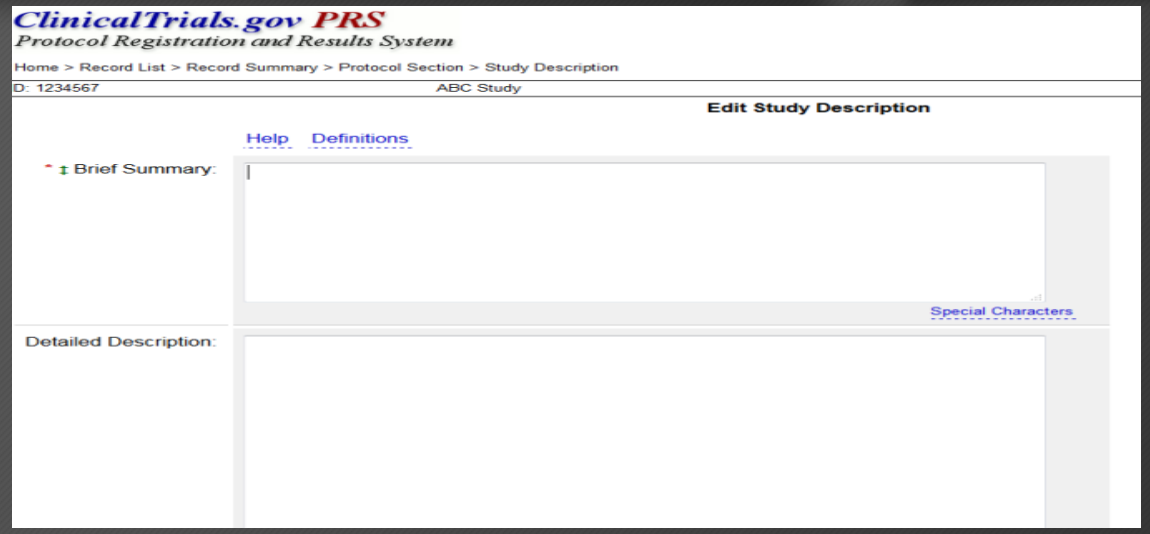
Sponsor/Collaborators

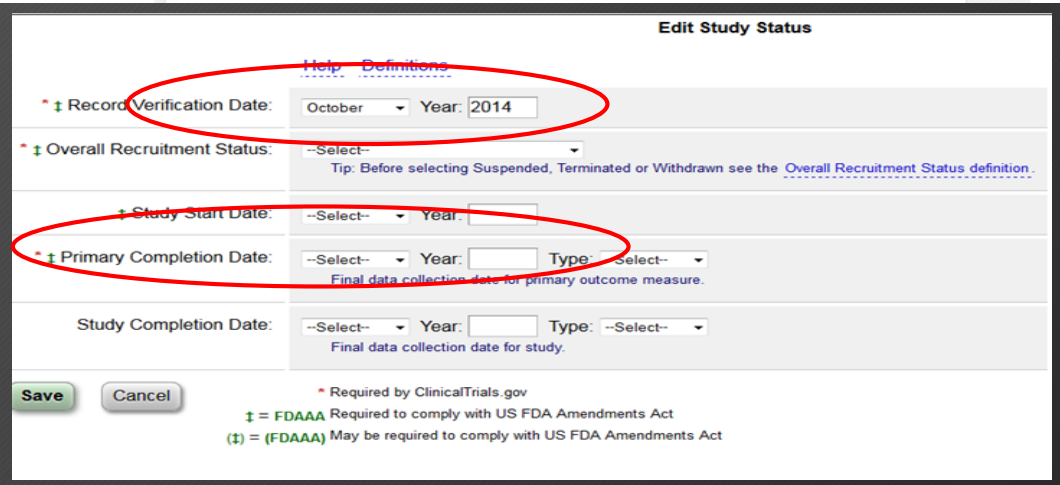
- The Sponsor/Collaborators section must list 'Sponsor-Investigator' as the responsible party type, and the PI's name should be selected from the drop down menu



Study Description/Status

- Brief Title and Summary should be in lay language
- Overall Recruiting Status and Recruiting Status in 'Contacts/Locations' must match
- Dates are needed for Study Start Date, and Primary and Study Completion Dates
- Change the Verification Date to the current month and year (this updates the record)





Outcome Measures

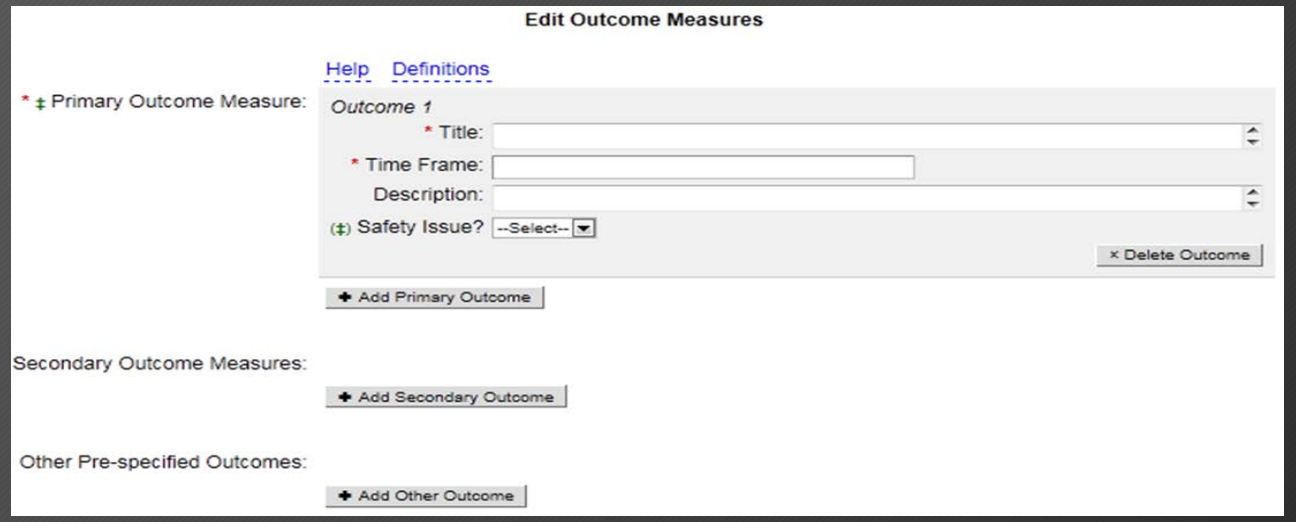
Outcome measure information: Please be as specific as possible.

- **Title:** include the name of the specific measure. Avoid using verbs, that is, do not put “To determine...”

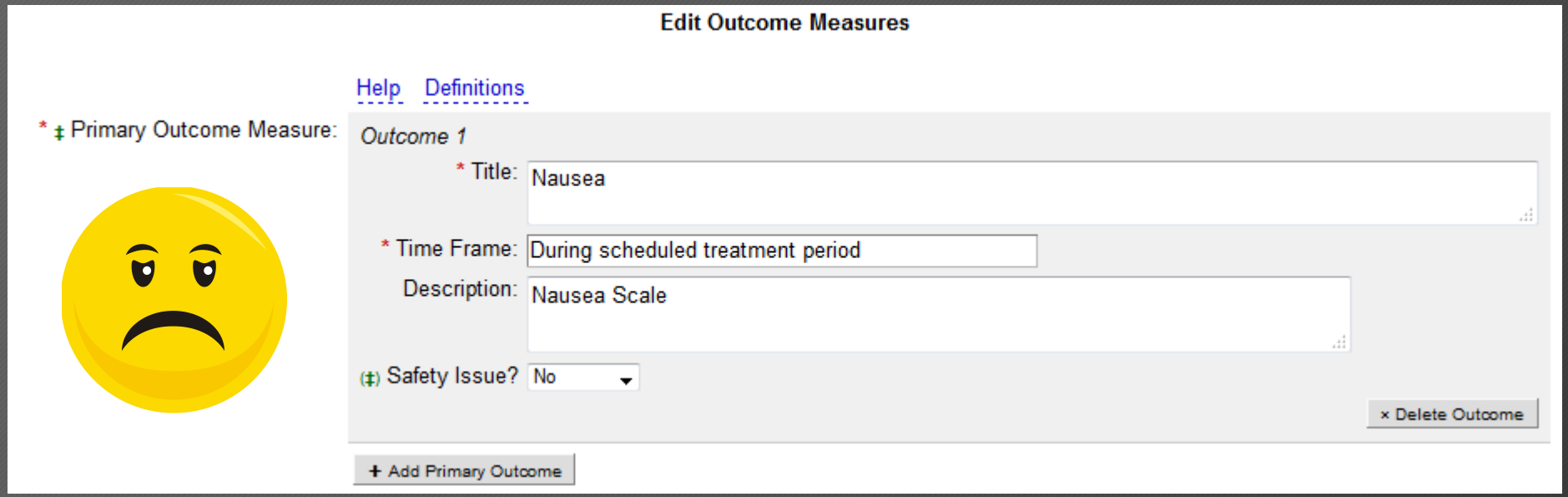
- **Time Frame:** must have a time point at which the outcome is assessed for the specific metric used (hours, days, weeks, years) Hint: specify which study day it is measured - do not use “until the end of study or death”

- **Description:** describes what will be measured, not why it is measured. If the outcome measure is a questionnaire or scale, provide the range and what low or high scores mean

- **Safety Issue:**
  Is this outcome measure assessing a safety issue?



Outcome Measure Example 1



Outcome Measure Example 2

Edit Outcome Measures

Help Definitions

* ‡ Primary Outcome Measure:

Outcome 1

* Title: Number of participants improved on the nausea scale

* Time Frame: 8 weeks

Description: Nausea scale range: 1 (severe) to 10 (none). Change: score at 8 weeks minus score at baseline. "Improved" = greater than 3 point difference in nausea scale.

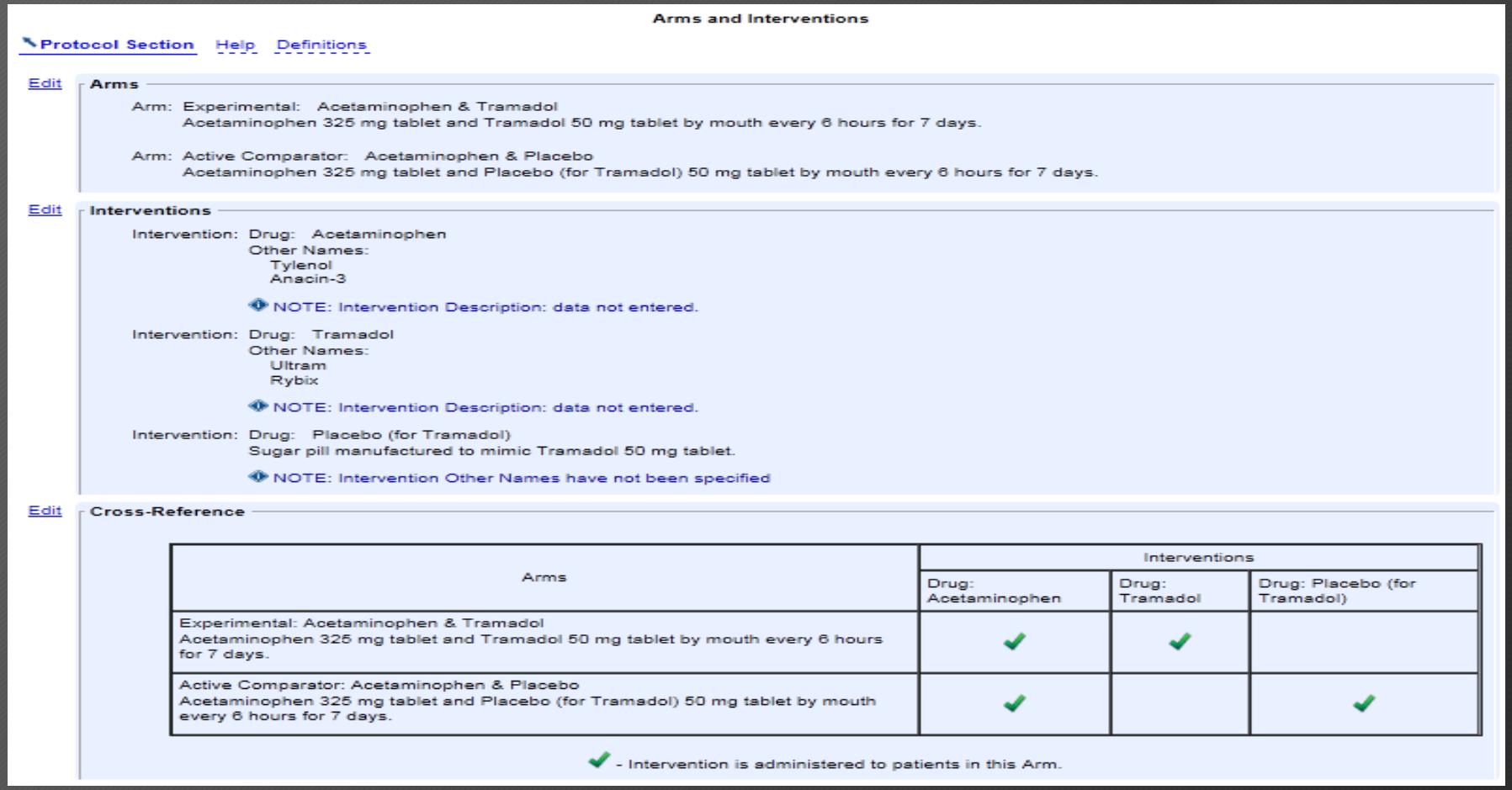
(‡) Safety Issue? No

× Delete Outcome

+ Add Primary Outcome

Arms and Interventions

- Arms = Rows
- Interventions = Columns
- Examples of different study designs can be found on ClinicalTrials.gov and PRS



Arms and Interventions

Protocol Section Help Definitions

Edit

Arms

Arm: Experimental: Acetaminophen & Tramadol
Acetaminophen 325 mg tablet and Tramadol 50 mg tablet by mouth every 6 hours for 7 days.

Arm: Active Comparator: Acetaminophen & Placebo
Acetaminophen 325 mg tablet and Placebo (for Tramadol) 50 mg tablet by mouth every 6 hours for 7 days.

Edit

Interventions

Intervention: Drug: Acetaminophen
Other Names:
Tylenol
Anacin-3

NOTE: Intervention Description: data not entered.

Intervention: Drug: Tramadol
Other Names:
Ultram
Rybix

NOTE: Intervention Description: data not entered.

Intervention: Drug: Placebo (for Tramadol)
Sugar pill manufactured to mimic Tramadol 50 mg tablet.

NOTE: Intervention Other Names have not been specified

Edit

Cross-Reference

Arms	Interventions		
	Drug: Acetaminophen	Drug: Tramadol	Drug: Placebo (for Tramadol)
Experimental: Acetaminophen & Tramadol Acetaminophen 325 mg tablet and Tramadol 50 mg tablet by mouth every 6 hours for 7 days.	✔	✔	
Active Comparator: Acetaminophen & Placebo Acetaminophen 325 mg tablet and Placebo (for Tramadol) 50 mg tablet by mouth every 6 hours for 7 days.	✔		✔

✔ - Intervention is administered to patients in this Arm.

Central Contacts/Locations

- List information from the research team, not the IRB
- Information can be copied from records, or manually entered
- Locations should list all study sites involved in research, including data analysis

Before Submitting a record

Please ensure you have thoroughly reviewed your study record…

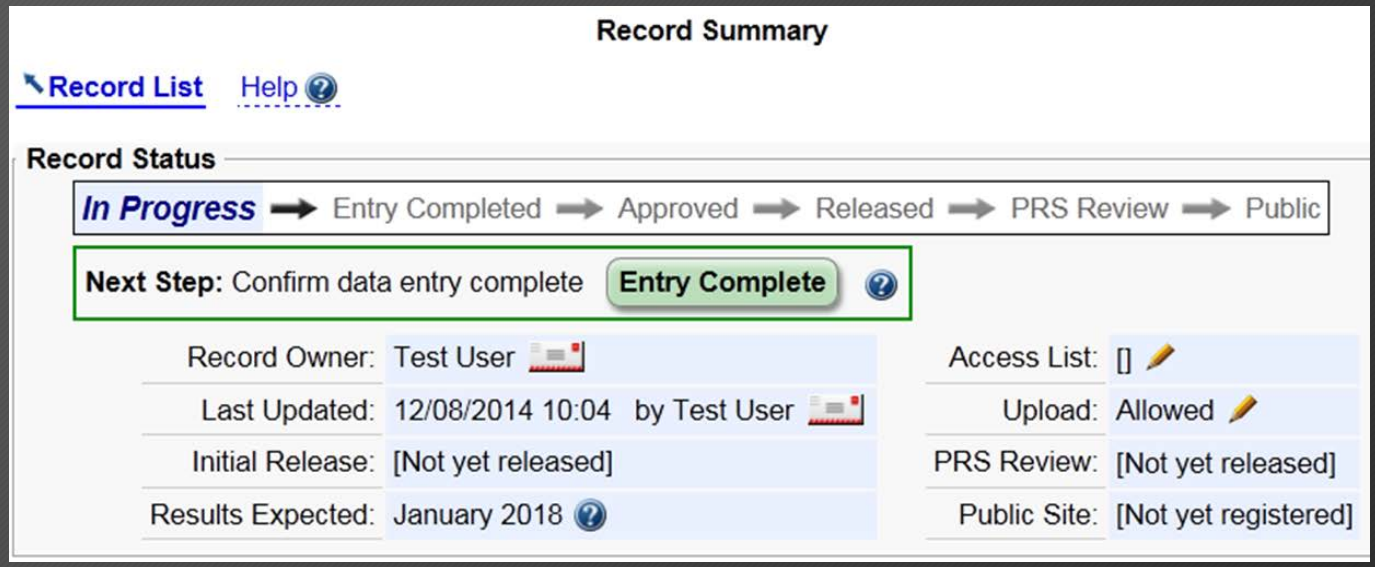
- All fields should be completely filled out and in lay language (where possible)
- All red errors must be corrected
- Any misspelled words should be corrected

  (Use Spelling Tool)
- Acronyms and abbreviations spelled out

Approve AND Release

Complete: The person updating or owner of the record will click on "Complete" to indicate that the study is ready for the "Approve" and "Release" actions

Approve and Release: The Responsible Party (PI, if Sponsor-Investigator) of the study needs to click on "Approve" and "Release" for the study to go through PRS review and be published on ClinicalTrials.gov website



PRS Review

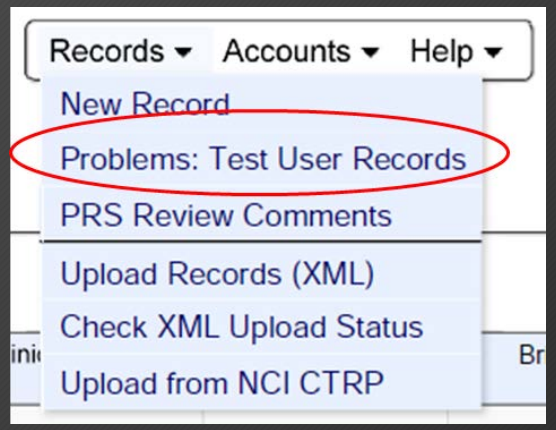
ClinicalTrials.gov does a manual review

- If there are QA issues, the record owner and RP will receive notification from ClinicalTrials.gov with comments
- The study will be reset to “In Progress”
- Study Owner/RP will corrected the issues and re-release it
- If there are no QA issues, the study is assigned an NCT number and published on the “public” side of the database
- This process takes about 2-5 business days

Check the Record for Problems

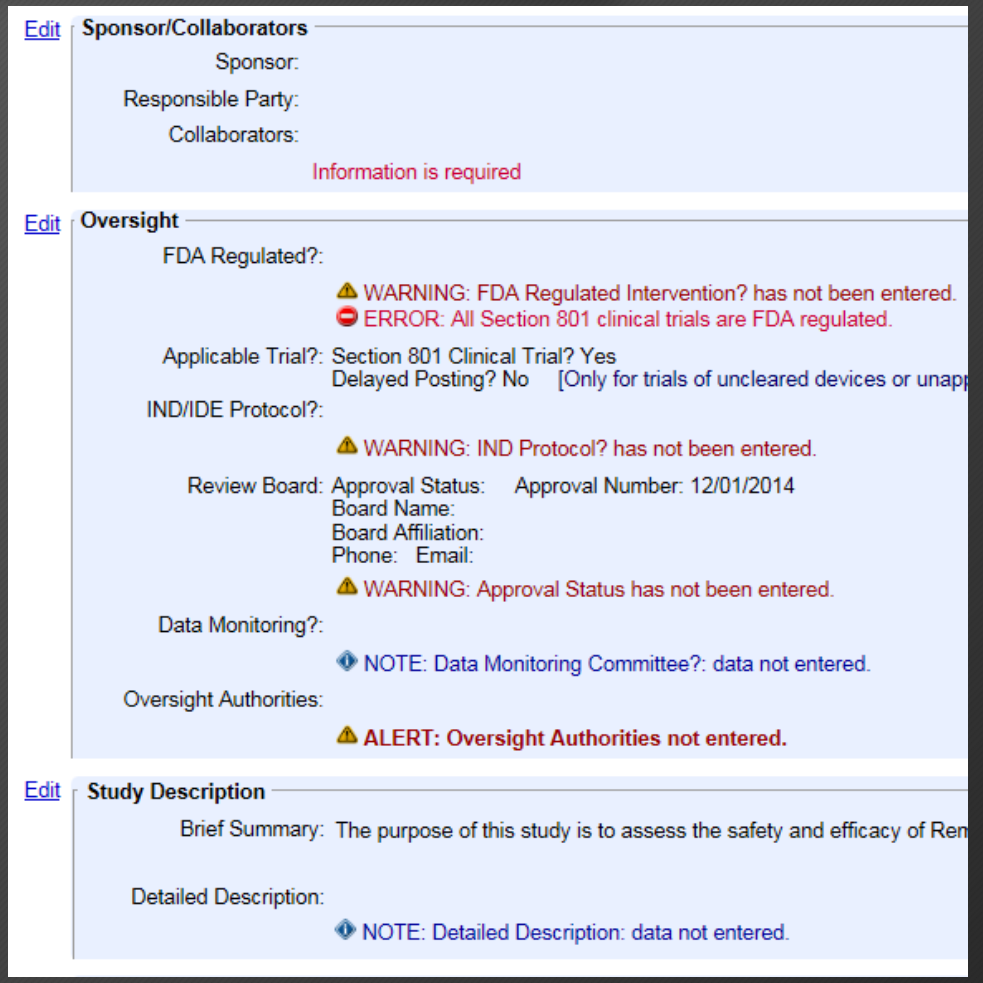
PRS System identifies current ‘Problem Records’

- Records that have not been marked as completed.
- Active studies that have not been updated in the past 6 months
- Records missing one or more data elements required by FDAAA, such as: Responsible Party, Study Start Date, Primary Completion Date and Primary Outcome Measure
- Records that appear to be overdue for registration of results per FDAAA



General Updating Tips

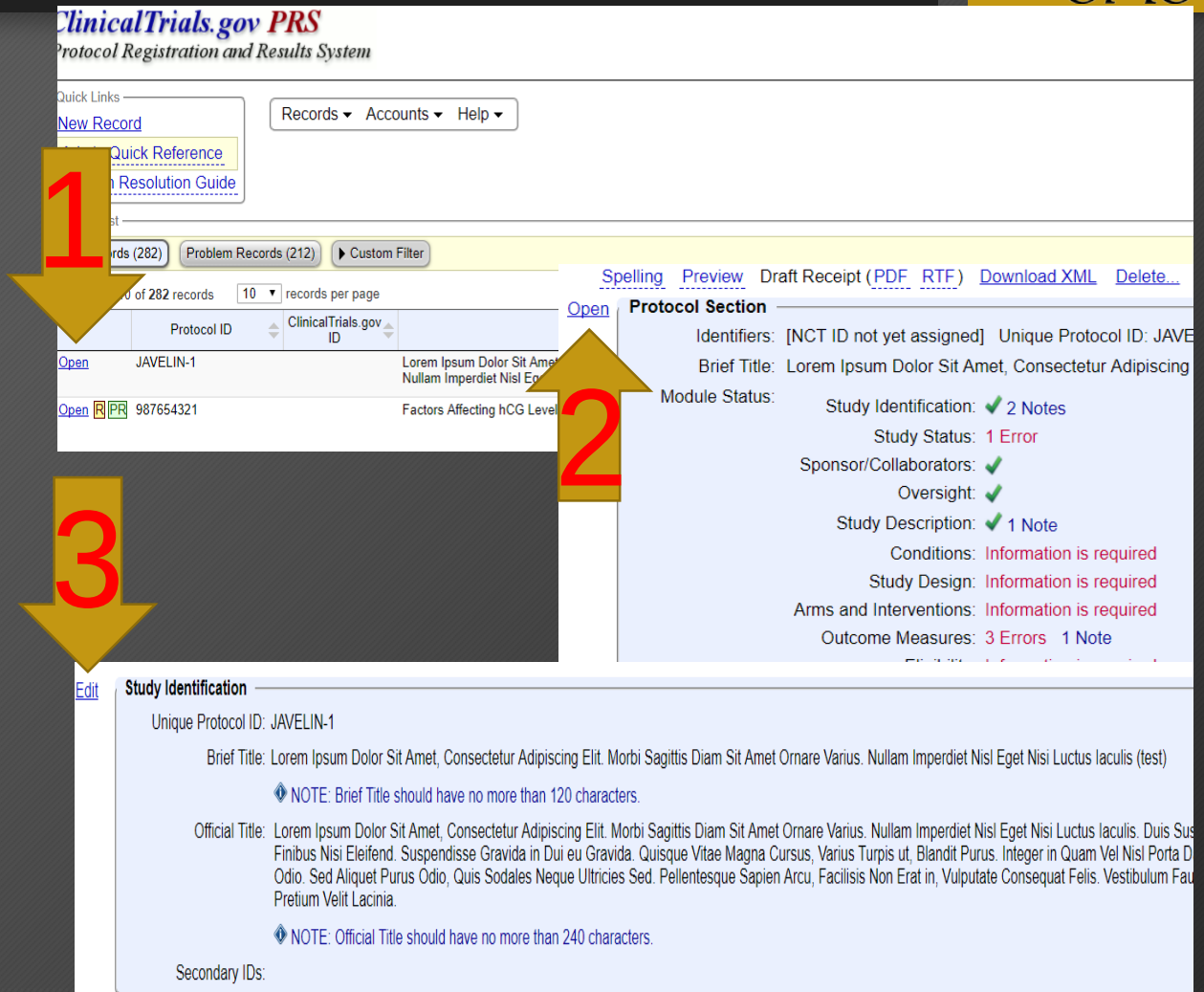
- Complete all fields
- Use **spelling tool** for spelling errors
- Spell out acronyms and abbreviations
- Use the EDIT links to make changes or "Edit All" link at top
- Check for errors and warnings
- Check for notes (optional to address)



Updating Your Record

1. Click on “Open” next to the record
2. Click on “Open” next to the Protocol Section
3. Make appropriate changes by clicking on “Edit” along the side in the study record

- If no changes have occurred in the year, update the Record Verification Date
- Click on the “Save” button at the bottom of the page
- Be sure to click on “Complete” when finished updating
- Know who is responsible for “Approval” and “Release”



What Else Do We Need to Know

- Results
- Training
- Departmental liaisons
- hso.research.uiowa.edu

Summary

- Fill out Registration (“Create” a record)
- Actions:
  - In Progress: Fields to be completed
  - Entry Completed: Ready for Approval and Release
  - Approved/Released:
    - RP is sole party that can “Approve & Release”
- ClinicalTrials.gov PRS Review
- NCT number assigned
- Posted on ClinicalTrials.gov 2-5 business days

Questions?

Contact Information

Brian Brotzman

PRS Administrator

319-384-4623

Ct-gov@uiowa.edu