ClinicalTrials.gov Guidance

1. **Determining Study Registration Requirements:**

    The PI is responsible for determining if the study is an Applicable Clinical Trial (ACT), thus requiring registration and results information on ClinicalTrials.gov. To determine if a study is an applicable clinical trial per 42 CFR 11, please use the checklist available on the ClinicalTrials.gov website (https://prsinfo.clinicaltrials.gov/ACT_Checklist.pdf).

    In addition to federal requirements (42 CFR 11), NIH Policy, journals [i.e., International Committee of Medical Journal Editors (ICMJE)], funding sources, and insurance companies (i.e., Medicare/Medicaid) may require registration and submission of results information.

    If the study was approved by OSU's Cancer IRB, the PI will be instructed to work with appropriately delegated ClinicalTrials.gov Administrator within the Comprehensive Cancer Center to ensure research studies are registered appropriately.

    Studies with approved consent language stating the study will be registered to ClinicalTrials.gov must register their study to ClinicalTrials.gov. If it is determined that the study does not require registration per regulations and the PI decides not to register the study for publication or other purposes, then an amendment removing the ClinicalTrials.gov language must be approved by the IRB of record and consented subjects must be notified.

    Studies with human subjects that are not required per regulations or publication requirements may still be registered to ClinicalTrials.gov per the PI's discretion.

2. **Determining Responsible Party**

    Please use the flow diagram below, the NIH's flow sheet, and information on the ClinicalTrials.gov website to determine who should be listed as the Responsible Party and what option should be selected.
    *   **For most studies initiated and written by an investigator at OSU, the PI of the study should be listed as the Responsible Party**, **whether listed as "Principal Investigator" or "Sponsor-Investigator."**
    *   The Responsible Party has the sole authority to approve and release the record.
    *   All records must be reviewed and released by the Principal Investigator.
    *   In the event that the PI leaves OSU, please contact the administrators to determine who should become the new Responsible Party.

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┌─────────────────────┐        ┌─────────────────────┐        ┌─────────────────────────┐
│ Does the study      │ Yes    │ Does PI hold the    │ Yes    │ PI is Sponsor and       │
│ involve an IND/IDE? │──────▶ │ IND/IDE?            │──────▶ │ Responsible Party. PI   │
└─────────────────────┘        └─────────────────────┘        │ should be listed as     │
         │                              │                      │ "Sponsor-Investigator." │
        No                             No                      └─────────────────────────┘
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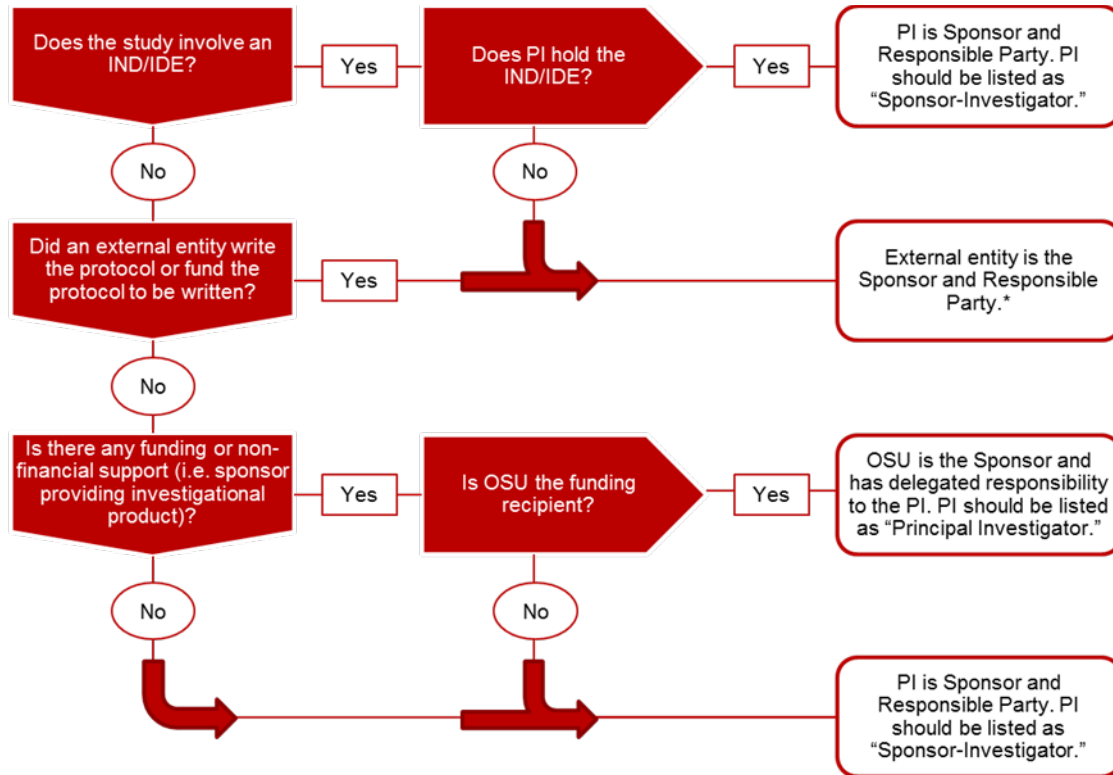
* The sponsor can delegate a Principal Investigator as responsible party for a study. Please see 42 CFR 11 for details.

Flowchart text:

- Does the study involve an IND/IDE? — Yes → Does PI hold the IND/IDE? — Yes → PI is Sponsor and Responsible Party. PI should be listed as "Sponsor-Investigator."
- Does PI hold the IND/IDE? — No → (continues down)
- Does the study involve an IND/IDE? — No → Did an external entity write the protocol or fund the protocol to be written? — Yes → External entity is the Sponsor and Responsible Party.*
- Did an external entity write the protocol or fund the protocol to be written? — No → Is there any funding or non-financial support (i.e. sponsor providing investigational product)? — Yes → Is OSU the funding recipient? — Yes → OSU is the Sponsor and has delegated responsibility to the PI. PI should be listed as "Principal Investigator."
- Is OSU the funding recipient? — No → PI is Sponsor and Responsible Party. PI should be listed as "Sponsor-Investigator."
- Is there any funding or non-financial support (i.e. sponsor providing investigational product)? — No → PI is Sponsor and Responsible Party. PI should be listed as "Sponsor-Investigator."

3. **Obtain an Account**

   The College of Medicine has separate ClinicalTrials.gov administrators for cancer and non-cancer clinical research studies.

   1. Requests for a ClinicalTrials.gov account can be made by contacting the appropriate organizational **ClinicalTrials.gov administrator**.
   2. The requestor must provide full name and preferred institutional e-mail address. Please note that the PI of the study will need to have a ClinicalTrials.gov account in order to approve and release the record. You may request that at the same time if the PI does not have an account yet.
   3. Once an account is created, you will be notified by the administrator and will receive an automated email from the Protocol Registration and Results System (PRS) with login instructions.

4. **Create, Update and Maintain Study Records**

   Instructions for creating, editing, approving, and releasing a study record are available on the main ClinicalTrials.gov website.

   1. Creating and updating submissions: For new records *please refer to section below on Creating a New Study Record for ClinicalTrials.gov*.
   2. Maintaining record: *please refer to section below on Maintaining Study Records on ClinicalTrials.gov*.

3. Records release: All records must be reviewed and released by the PI.

5. **Post Clinical Trial Consent Form**

ClinicalTrials.gov can be used to fulfill the Common Rule requirement (45 CFR 46.116(h)) to post a consent form used to enroll study subjects into a clinical trial conducted or supported by a Federal department or agency. Upload an IRB approved ICF in the document section within the ClinicalTrials.gov record. The help link in the document section provides instructions.

6. **Submit Results**

Instructions for submitting results are available on the ClinicalTrials.gov website.

7. **Timeline Requirements**

Event	Timeline requirements	Notes
Registration	No later than **21 days** after the first subject is enrolled. ICMJE requires that registration is complete **prior** to first subject enrollment.	A study is considered registered once the responsible party releases the record to PRS for review.
Actively enrolling studies	Update/verification every **6 months**.	The record must be verified even if no changes need to be made.
Studies closed to enrollment or pending results	Update/verification **annually**.	The record must be verified even if no changes need to be made.
Change in study status	Within **30 days** of status change.	
Posting of clinical trial consent form	After the clinical trial is closed to recruitment, and no later than **60 days** after the last study visit by any subject.	Only one IRB-approved informed consent form used to enroll subjects must be posted.
Results submission	No later than **1 year** after the primary completion date.	Delayed submission of results is permitted in certain circumstances. See 42 CFR 11.44 for details.

8. **Protocol Record Management**

1. The Responsible Party is ultimately responsible for ensuring the studies are registered with ClinicalTrials.gov and updated appropriately at required intervals and released to the public database. Refer to *Section G* above for timeline requirements for updates.

2. The PI and protocol Record Owner should be contacted by the appropriate ClinicalTrials.gov administrator if their protocol record is delinquent and needs to be updated.
3. If the protocol record remains delinquent two weeks after the first notice, a second notification should go out to the PI, protocol Record Owner and department chair.
4. If the protocol record remains delinquent one month after the initial contact without acceptable activity/progress, alternative management of the account by another party should be arranged. The cost of these services may be billed to the department.
5. Records that are entered into the ClinicalTrials.gov database, but are not released, should get one notification and if left incomplete at 30 days post notification, the record should be deleted from the database.
6. **Please note that records cannot be deleted once they have been issued an NCT number, even after the study has been completed.** There are limited circumstances when a record can be removed from the public site – please contact the administrator for assistance.

College of Medicine Office of Research Compliance Team (COMOR-CT) will send out bi-annual emails for trials that are not in compliance, from which time the Record Owner and the Responsible Parties will have 30 days to complete the record. COMOR-CT will send out e-mail reminders at 7 days and one day prior to the deadline.

9. **Transferring a Record:**

1. If the Record Owner or Responsible Party is leaving the Institution, they should inform their ClinicalTrials.gov Administrator to ensure the record is appropriately monitored or transferred. The Record Owner or PI can either be reassigned to another Record Owner or PI within the university, or the record can be transferred to a new institution.
2. If the PI (Responsible Party) is moving studies from another institution, please contact your designated ClinicalTrials.gov administrator to help facilitate the record transfer.

10. **Penalties**

1. Under 42 CFR 11, civil and monetary penalties exist for noncompliance. Monetary penalties can be up to 10,000 US dollars a day.
2. Grant funding can be withheld until the required information has been submitted.
3. Journals can refuse to publish data from records that are noncompliant.
4. Noncompliance with OSU policies, 42 CFR 11, and other requirements could result in corrective actions that may include reporting of noncompliance to the IRB.
5. Problem records that remain unresolved past 30 days will be subject to OSU user account deactivation per the COMOR-CT.
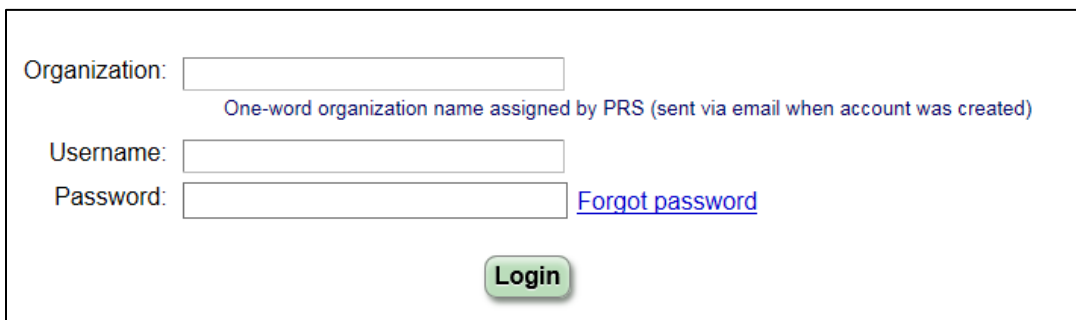
Creating a New Study Record for ClinicalTrials.gov

Applicable clinical trials under 42 CFR 11 and NIH-funded clinical trials must be registered no later than 21 calendar days after the first human subject is enrolled. However, ICMJE requires that studies are registered prior to the first subject enrollment. Please refer to any relevant regulations for details.

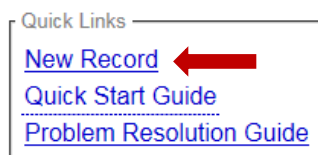***Please note that a trial is considered registered once the responsible party releases the record to PRS for review.***

1. Log in to the ClinicalTrials.gov **Protocol Registration and Results System (PRS)** website. https://register.clinicaltrials.gov/

   Use the organization name and username that you received when your account was generated. For non-cancer clinical trials, the organization will be **OhioU**. If you do not remember your login information, or if you need to reset your password, contact your administrator.

Organization:	_____
	One-word organization name assigned by PRS (sent via email when account was created)
Username:	_____
Password:	_____ Forgot password
	Login

2. Create a **New Record** under Quick Links.

   Quick Links
   New Record ⬅
   Quick Start Guide
   Problem Resolution Guide

3. Verify that you are responsible for registering the study.

4. Enter the OSU IRB number as the **Organization's Unique Protocol ID** (ex: 2017H0115) and fill in the rest of the information as it applies to your study.

5. Continue filling in the information as it applies to your study. Please note that **Secondary ID** may be the grant/contract award number, registry identifier, EudraCT number, or other identifier.

6. You can click **Continue** or **Quit** if you need to come back to a page and any information already entered will be saved.

7. **Oversight > Human Subject Protection Review**, enter the information as follows:

Board Name:	**Biomedical Sciences IRB**
Board Affiliation:	**The Ohio State University**
Board Contact:	**Sandra Meadows**
Phone:	**614-688-8641**
Email:	**meadows.8@osu.edu**
Address:	**1960 Kenny Road**
	Columbus, OH 43210

8. **Tips:**

   - The **Help** and **Definitions** links are unique to each page's content and can be very helpful.

   - For additional help, you can contact the site administrators by clicking on the **Contact ClinicalTrials.gov PRS** link in the upper right corner of the page. You can also contact the OSU administrators for help.

   - **Study Identification > Secondary ID**: the grant/contract award number, registry identifier, EudraCT number, or other identifier.

   - **Study Status > Record Verification Date:** This date refers to the current month and year. When updating a record, always update the Record Verification Date.

   - **Sponsor/Collaborators > Responsible Party** should be listed as Principal Investigator or Sponsor-Investigator for any OSU-led studies. Please see the COM ClinicalTrials.gov SOP for more information on determining the responsible party.

   - **Preview:** You can preview how your record will look on the public site by clicking on **Preview** above the **Protocol Section.**

   - **Oversight:** The information contained within the **Oversight** section is used to determine the registration and reporting requirements per 42 CFR 11. Please verify that this information is entered correctly and ask for help as needed.

9. After completing the initial questions, you will be brought to the **Protocol Section** page. You can update information as needed by clicking **Edit** next to the desired section.

10. Verify that your record is free from errors prior to completing.
    🚫 ERROR messages indicate serious problems that must be addressed.
   ⚠️ WARNING messages indicate items that are (or may be) required by FDAAA 801.
    🔵 NOTE messages indicate potential problems that should be reviewed and corrected as needed.

11. On the **Record Summary** page, add the PI to the **Access List** by clicking **Edit** and selecting his/her name if he/she is not the record owner. If the PI's name is not listed, submit a request to your administrator to have an account created.
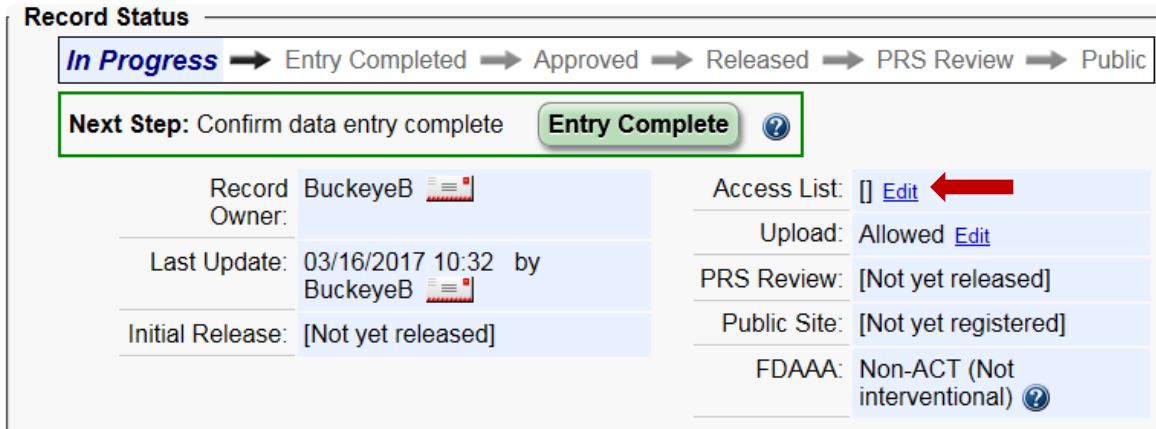
12. Once the record is complete, click on **Entry Complete**. The record owner and Responsible Party will be sent an automated email to indicate that the record is complete and ready for approval and review.

    If any changes need to be made after an entry is marked complete, click **Reset to In-Progress** above the **Next Step** box or simply edit the necessary section and it will automatically reset.
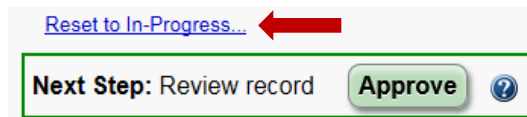
13. The Responsible Party needs to log in to the system to review the record and approve the record by clicking the **Approve** button within the **Next Step** box.
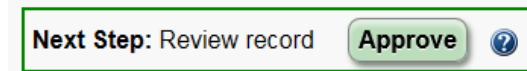
14. The Responsible Party then needs to release the record for PRS review by clicking the **Release** button within the **Next Step** box.
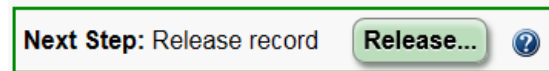
15. Once a record is released, it will be sent to the ClinicalTrials.gov PRS quality assurance (QA) review prior to being assigned an NCT number and being published to the public site.

16. If there are any comments from the PRS review, the record will be reset to **In Progress** and the **Next Step** box will be updated to **Address Review Comments**. *Comments must be addressed no later than 15 calendar days after notification.*
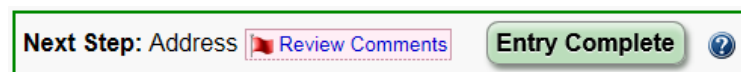
    A link to the comments will be provided under the **PRS Review** and there will be a flag by any section(s) that has comments that need to be addressed.

PRS Review: Record Reset 🚩 Review Comments   Review History

17. Once the record has been updated to address the QA comments, repeat steps 12-16 until the PRS review returns no comments.

18. The record will be published to the public site and an NCT number will be generated.

19. **Notes for updating and maintaining records**:

    a. Each record must be verified at least once every **6 months** for actively enrolling studies or **12 months** for studies closed to enrollment, even if nothing has changed.

    b. Records must be updated no later than **30 calendar days** of change in enrollment status or any other significant changes to the protocol.

    c. Device Product Not Approved or Cleared by U.S. FDA must be updated no later than **15 calendar days** after a change in approval or clearance status has occurred.
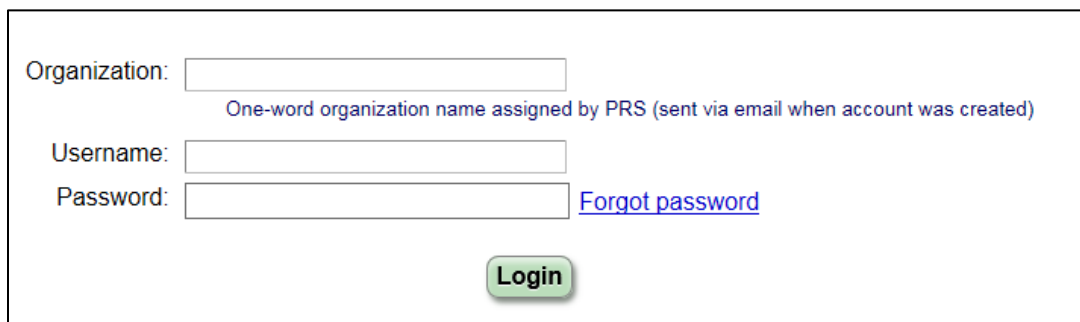
    d. Clinical trial results must be posted no later than **1 year** after the primary completion date. Delayed results submission is allowed in some cases; please see 42 CFR 11 for more details.

    e. Any errors must be addressed no later than **15 calendar days** after notification for clinical trial registration information, or **25 calendar days** for clinical trial results information.

MAINTAINING STUDY RECORDS ON CLINICALTRIALS.GOV

All records need to be verified no less than every **6 months** for actively enrolling studies or **12 months** for studies closed to enrollment, even if nothing has changed. Please follow the instructions below for annual verification.

Records must be updated no later than **30 calendar days** of change in enrollment status or any other significant changes to the protocol.

Device Product Not Approved or Cleared by U.S. FDA must be updated no later than **15 calendar days** after a change in approval or clearance status has occurred.

Clinical trial results must be posted no later than **1 year** after the primary completion date. Delayed results submission is allowed in some cases; please see 42 CFR 11 for more details.

Any errors must be addressed no later than **15 calendar days** after notification for clinical trial registration information, or **25 calendar days** for clinical trial results information.

Verifying a record for annual maintenance, when no changes need to be made:

1. Log in to the ClinicalTrials.gov **Protocol Registration and Results System (PRS)** website.
   https://register.clinicaltrials.gov/

   Use the organization name and username that you received when your account was generated. For non-cancer clinical trials, the organization will be **OhioU**. If you do not remember your login information, or if you need to reset your password, contact your administrator.

2. Click **Open** next to the record you want to verify.
3. Click **Open** next to **Protocol Section.**
4. Click **Edit** on the **Study Status** section.

5. Update the **Record Verification Date** to the current month and year.

6. Click **Save.**
7. Return to the **Record Summary**.
8. Click **Entry Complete** in the **Next Step** box.

9. The Record Owner and Responsible Party will be sent an automated email to indicate that the record is complete and ready for approval and review.
10. The Responsible Party needs to log in to the system to review the record and approve the record by clicking the **Approve** button within the **Next Step** box.

11. The Responsible Party then needs to release the record for PRS review by clicking the **Release** button within the **Next Step** box.

12. Once a record is released, it will be sent to the ClinicalTrials.gov PRS quality assurance (QA) review prior to being published to the public site.

    If the only change is to update the record verification date and the record did not have any existing problems, you should not receive any review comments from PRS and the record will be made public within 2-5 business days.

Updating a record when changes need to be made:

1. Follow steps 1-5 for **Verifying a record for annual maintenance.**
2. Click **Edit** next to any other sections that need to be updated or **Edit All** to update the whole record.
3. Follow the remaining steps as above.

4. If any changes need to be made after an entry is marked complete, click **Reset to In-Progress** above the **Next Step** box or simply edit the necessary section and it will automatically reset.

5. Once a record is released, it will be sent to the ClinicalTrials.gov PRS QA review prior to being published to the public site.

   If there are any comments from the PRS review, the record will be reset to **In Progress** and the **Next Step** box will be updated to **Address Review Comments**. *<u>Comments must be addressed no later than 15 calendar days after notification.</u>*

   Next Step: Address ▶ Review Comments | Entry Complete | ⓘ

   A link to the comments will be provided under the **PRS Review** and there will be a flag by any section(s) that has comments that need to be addressed.

   PRS Review: Record Reset ▶ Review Comments   Review History

6. Repeat steps 2-5 until the PRS review returns no comments. The record will be published to the public site within 2-5 business days.