***Registration and Maintenance of ClinicalTrials.gov***

1. **PURPOSE**

This Standard Operating Procedure (SOP) describes the procedures, processes, and responsibilities for the registration and maintenance of a clinical trial on ClinicalTrials.gov to meet the Food and Drug Administration Amendments Act (FDAAA) of 2007 and comply with the International Committee of Medical Journal Editors (ICMJE) requirements for publication.

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1. **SCOPE**

This SOP applies to the Principal Investigator (PI) and other research team members that are involved in registering, updating, and reporting the results of a clinical trial on ClinicalTrials.gov.

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*[Optional: Insert any additional details necessary to further define the scope of this SOP]*

1. **POLICY**

The registration and maintenance of applicable clinical trials (ACT) in ClinicalTrials.gov as described in Section 801 of the Food and Drug Administration Amendments Act (known as FDAAA801 or U.S. Public Law 110-85) is required at the University of Michigan.

The NIH encourages registration of all clinical trials, whether required under the law or not. In addition, journals increasingly refuse to publish results of trials that were not adequately registered in a comparable registry prior to enrollment of the first participant. The International Committee of Medical Journal Editors (ICMJE), for instance, generally requires registration of research projects that prospectively assign human subjects to intervention and comparison groups to study the cause-and-effect relationship between a medical intervention (e.g., drug, surgical procedure, device, behavioral treatment, process-of-care change) and a health outcome (broadly defined, including pharmacokinetics).

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**Additional Regulations or Policies ☐ N/A**

*[Optional: Insert any additional project, department, sponsor, institution, state or federal policies that apply.]*

1. **DEFINITIONS**

APPLICABLE CLINICAL TRIAL (ACT): Under the statute FDAAA Sec. 801 “applicable clinical trials” generally include:   
 (1) *Trials of Drugs and Biologics*: Controlled, clinical investigations, other than Phase 1

investigations, of a product subject to FDA regulation.

(2) *Trials of Devices*: Controlled trials with health outcomes, other than small feasibility studies, and pediatric postmarket surveillance.

Complete statutory definitions and more detailed information on the NIH’s current thinking about the meaning of “applicable clinical trials” may be found in the “Elaboration of Definitions of Responsible Party and Applicable [Clinical](https://prsinfo.clinicaltrials.gov/ElaborationsOnDefinitions.pdf) Trial”.

CLINICALTRIALS.GOV: A website that provides regularly updated information about federally and privately supported clinical trials. Clinical trials for a wide range of diseases and conditions are included.

eRESEARCH REGULATORY MANAGEMENT (eRRM): eRRM is the web-based system that centralizes the review and approval process for Human Subjects Research Applications and IBC Biosafety Registrations.

NCT NUMBER: Every study on ClinicalTrials.gov is assigned a unique number called the ClinicalTrials.gov Identifier. This number is assigned after the protocol information has been released (submitted) by the Responsible Party and passed review by ClinicalTrials.gov staff.

PROTOCOL REGISTRATION AND RESULTS SYSTEM (PRS): A web-based data entry system used to register clinical studies, provide updates and to submit results information for registered studies.

RESPONSIBLE PARTY: The entity responsible for registering the trial and providing updated information. The statute defines the responsible party as:

(1) the sponsor of the clinical trial (as defined in 21 CFR 50.3), or  
(2) the Principal Investigator of such clinical trial if so designated by a sponsor, grantee, contractor, or awardee (provided that “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” for submitting information under the law.) See PL 110-85, Section [801](http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=110_cong_public_laws&docid=f:publ085.110.pdf)(a) (PDF - 549 KB), (adding new 42 U.S.C. 282(j)(1)(A)(ix))

Complete statutory definitions and more detailed information on the NIH’s designation of ‘responsible party’ may be found in the “Elaboration of Definitions of Responsible Party and Applicable [Clinical](https://prsinfo.clinicaltrials.gov/ElaborationsOnDefinitions.pdf) Trial”.

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*[Optional: Insert any additional definitions for technical or special terms used within the Standard Operating Procedure that may not be familiar to the lay reader]*

**Note:** Many of the definitions above were obtained from the IRBMed Glossary. These definitions were current as of 15-Sep-2015 and are subject to change. Please see the [IRBMed Glossary](http://medicine.umich.edu/medschool/research/office-research/institutional-review-boards/guidance/glossary) for the most current definitions and additional guidance.

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1. **ROLES AND RESPONSIBILITIES**

**Principal Investigator**

The Principal Investigator or designee is responsible for determining whether the trial is required to register on Clinicaltrials.gov and whether he or she is the Responsible Party for such registration.

If the Principal Investigator (PI) is the Responsible Party (i.e. for an Investigator initiated clinical trial) for an ACT, or for a trial which he or she chooses to register for other reasons, he or she will ensure the trial is registered and maintained on ClincalTrials.gov. In these cases, the PI shall be accountable for the following activities:

* Ensures that the informed consent document uses the necessary sentences required by 21 CFR 50.25(c) if the trial is an Applicable Clinical Trial
* Obtains an account in the PRS system and authorizes access for research team members, as appropriate
* Ensures registration activities are completed appropriately prior to enrollment of the first subject in the clinical trial
* Approves and releases the registration and subsequent updates to the extent required by law
* Ensures the information provided on ClinicalTrials.gov is entered, verified, reviewed, approved and updated in a timely manner to the extent required by law
* Ensures results reporting in Clinicaltrials.gov is completed to the extent required by law
* Assures that the NCT Number assigned by ClinicalTrials.gov is entered into the eRRM system to facilitate appropriate Medicare/Medicaid billing
* Delegates activities to other research team members, as appropriate

If the Principal Investigator (PI) is not a Responsible Party for an ACT (i.e. outside entity or Sponsor is the responsible party), the PI will be accountable for the following activities:

* Ensures that the informed consent document uses the necessary sentences required by 21 CFR 50.25(c)
* Obtains the NCT Number from the sponsor or outside entity after confirming that they will be the Responsible Party for Clinicaltrials.gov registration
* Assures that the NCT Number provided is added to the eRRM system

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*[Optional: Insert any additional details regarding the responsibilities of the Principal Investigator]*

**Study Coordinator(s)/Designee**

An individual filling this role may be responsible for the following activities:

* Obtains an account in the PRS system
* Drafts the ClinicalTrials.gov registration for the clinical trial
* Facilitates necessary review of registration record by the Principal Investigator
* Assists the PI with approving and releasing the completed registration
* Updates and edits ClinicalTrials.gov when necessary
* Gathers data for required results reporting

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*[Optional: Insert any additional details regarding the responsibilities of the Study Coordinator(s)/Designee*]

**Statistician(s)/Designee**

An individual filling the role of Statistician is responsiblefor contributing to results reporting requirements. The Statistician or designee shall be responsible for the following activities:

* Assists the research team with the reporting of results for ClinicalTrials.gov as required

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*[Optional: Insert any additional details regarding the responsibilities of the Statistician(s)/Designee]*

**Additional Roles and Responsibilities**  **☐ N/A**

*[Optional: Insert any additional role(s) and responsibilities that apply to this SOP]*

1. **PROCEDURE**

**Determine whether a clinical trial is required to be registered in ClinicalTrials.gov.**

*[Describe the process to determine if a clinical trial requires registration and results reporting on ClinicalTrials.gov at your site/location. Publication in ICME journals also requires registration.]*

*[Describe the process to decide whether a non-required study should be registered. Registration of all trials is encouraged by the NIH.]*

**Registration, Maintenance and Reporting Results on ClinicalTrials.gov**

*[For Applicable Clinical Trials in which it is determined that the PI is the Responsible Party or when a PI(s) elect to register a trial in ClinicalTrials.gov when it is not required, describe the process for registering a clinical trial into ClinicalTrials.gov (this should be done before the enrollment of the first patient)]*

*[Describe the process for editing and routinely updating record verification dates* *in the required timeframes for ClinicalTrials.gov]*

*[For Applicable Clinical Trials that are required to report results, describe the process for reporting results in ClinicalTrials.gov in the required timeframes]*

**Additional Procedures** **☐ N/A**

*[Optional: Insert any additional relevant procedures. Provide enough detail to ensure the procedure is consistently carried out, without providing so much detail that violations occur due to normal or expected variations in the work.]*

1. **REFERENCES**

Centers for Medicare and Medicaid Services - Medicare Clinical Trial Policies:

<https://www.cms.gov/Medicare/Coverage/ClinicalTrialPolicies/index.html?redirect=/ClinicalTrialPolicies/>

ClinicalTrials.gov - Home Page:

<http://www.clinicaltrials.gov/ct2/manage-recs>

ClinicalTrials.gov - FDAAA 801 Requirements:

<https://clinicaltrials.gov/ct2/manage-recs/fdaaa>

CMS.gov - Mandatory Reporting of an 8-Digit Clinical Trial Number on Claims:

<https://www.cms.gov/Outreach-and-Education/Medicare-Learning-Network-MLN/MLNMattersArticles/downloads/MM8401.pdf>

CMS.gov - Mandatory Reporting of National Clinical Trial (NCT) Identifier Numbers on Medicare Claims – Qs & As:

<https://www.cms.gov/Medicare/Coverage/Coverage-with-Evidence-Development/Downloads/Mandatory-Clinical-Trial-Identifier-Number-QsAs.pdf>

International Committee of Medical Journal Editors (ICME) - Clinical Trial Registration: <http://www.icmje.org/recommendations/browse/publishing-and-editorial-issues/clinical-trial-registration.html>

International Committee of Medical Journal Editors (ICME) - [Clinical Trials Registration](http://www.icmje.org/about-icmje/faqs/clinical-trials-registration/) FAQs:

<http://www.icmje.org/about-icmje/faqs/>

NIH - NIH Implementation of FDAAA:

<http://grants.nih.gov/clinicaltrials_fdaaa/ACTs_under_FDAAA.htm>

<http://grants.nih.gov/ClinicalTrials_fdaaa/definitions.htm>

NIH - U.S. National Library of Medicine - What is ClinicalTrials.gov:

<http://www.nlm.nih.gov/pubs/factsheets/clintrial.html>

<http://www.nlm.nih.gov/services/ctwhatis.html>

NIH - ClinicalTrials.gov Registration and Reporting:

<http://www.ninds.nih.gov/research/clinical_research/basics/clinicaltrials_required_registration.htm>

University of Michigan - Clinical Trial Registration Requirements - What Happens to Unregistered or Incompletely Registered Trials?:

<http://msa.med.umich.edu/regulatory_affairs/research/human/clinical-trials#Unregistered>

University of Michigan - Operations Manual - Laws, Regulations and Standards - Clinical Trials Disclosure Requirements:

<http://research-compliance.umich.edu/operations-manual-laws-regulations-and-standards#registration>

University of Michigan - Regulatory Affairs - Clinical Trial Registration Requirements and Decision Trees:

<http://msa.med.umich.edu/regulatory_affairs/research/human/clinical-trials> <http://www.med.umich.edu/medschool-regulatory/Policies/Clinicaltrials-gov.html>

United States Government - Public Law 110-85 - Title VIII Clinical Trial Databases:

<http://www.gpo.gov/fdsys/pkg/PLAW-110publ85/pdf/PLAW-110publ85.pdf#page=82>

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*[Optional: Insert any additional SOP references]*

1. **APPENDICES**

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*[Optional: Insert any additional SOP appendices]*