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Clinical Research Newsletter

A Newsletter for Clinical Research Professionals

Clinical Trials Office, Columbia University

Announcements

- The Final Rule has been in effect since January 18, 2017 for clinical trials registration and results submission on *ClinicalTrials.gov*. For assistance, please contact CU Administrators at ClinicalTrialsGov@cumc.columbia.edu.
- RecruitMe is a recruitment tool meant to connect those who want to participate in clinical trials or research studies to the researchers that are conducting them. To post your trial or for additional inquiries, please contact recruitme@columbia.edu.
- CUIMC IRB Liaison Service is conducting Open Walk-In Consultation Hours remotely until further notice. For more information please contact IRB Liaison, Tasha Smith, at ts2257@cumc.columbia.edu or 212-342-5136.
- The University has a new Policies Website, which is a consolidation of other policy sites, including the Administrative Policy Library and Essential Policies sites.

ClinicalTrials.gov — What's New in 2020?

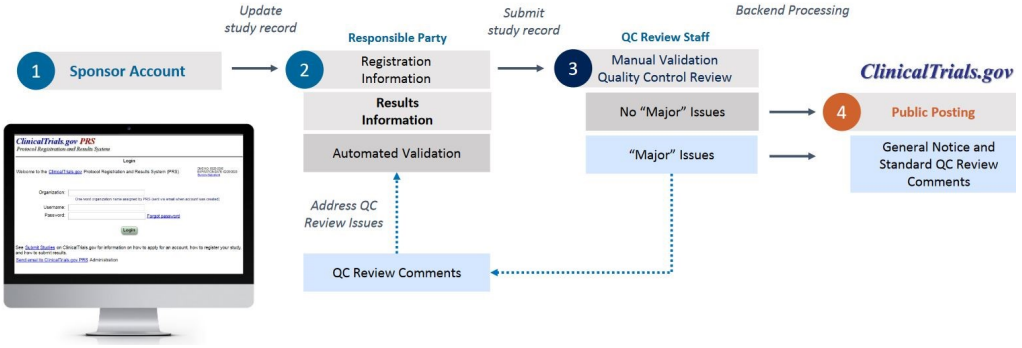
Updated quality control and posting procedures

Effective January 1, 2020, ClinicalTrials.gov implemented new posting procedures for results submission for Applicable Clinical Trials (ACTs). In accordance with the Final Rule 42 CFR Part 11, the National Library of Medicine (NLM) is obligated to publicly post submitted results information, regardless of whether their quality control (QC) review process has concluded (i.e., study records could be posted with review comments).

What is the QC review process?

The purpose of the QC review process is to review the record for errors, deficiencies, and inconsistencies prior to public posting. The QC review process is a two-part process: 1) When entering results into the Protocol Registration and Results System (PRS), automated validation rules appear suggesting corrections; and 2) After submission to PRS, NLM staff manually review the record and categorize comments as 'Major' or 'Advisory.'

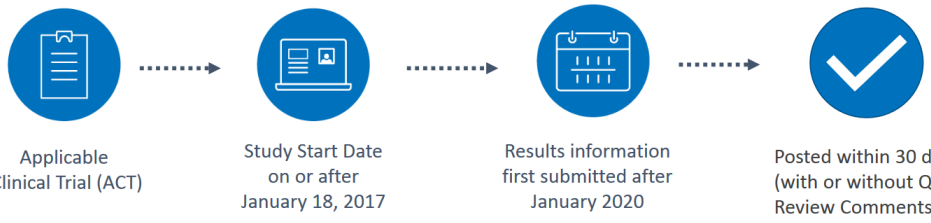
Under the legacy QC review process, results did not appear publicly until the Responsible Parties had a chance to address all Major comments. Effective January 1, 2020, results will be publicly posted within 30 days of submission, along with Major comments regardless of whether the QC review process is complete.



Does the updated QC procedures apply to my study?

The updated QC procedures apply to studies that meet all three criteria:
⇒ Studies that are Applicable Clinical Trials (ACTs).
⇒ Studies with a start date on or after January 18, 2017, the effective date of the Final Rule.
⇒ Studies with results information submitted on or after January 1, 2020.

This procedure applies as follows:



Are all PRS comments publicly visible? How will comments appear on the record?

Only the brief, major comments appear publicly. The major comments are issued from standard template language. The record will also contain a note that the QC review process is not complete. Advisory comments are suggestions and will not be publicly viewable. *See below for an example of how comments will appear.*

Study NCT11110000
on Date: January 18, 2020 (v6)

Quality Control Review Has Not Concluded

Note: The results information displayed below has not completed the quality control (QC) review process. ClinicalTrials.gov must post results information for applicable clinical trials (ACTs) within 30 days of submission, even if the submission has not completed the QC review process. The study sponsor or investigator is responsible for ensuring the results information meets the QC review criteria.

This submission includes brief standardized QC review comments added by the National Library of Medicine. These comments indicate the location of apparent errors, deficiencies, or inconsistencies.

For more information, see the Final Rule (42 CFR Part 11) Information page.

General Notice

Results Baseline Characteristics

	Arm/Group Title	Remuverol
Performance Status Measure Type: Count of Participants Unit of measure: participants	Number Analyzed	29 participants
0		5
1		23
2		1

Quality Control Review Comment provided by the National Library of Medicine [1]:

Major Issues: 1) Information about the scale used in this measure appears to be missing. Additional information about the scale is typically needed to interpret measure data.

Standard QC Review Comment (Public)

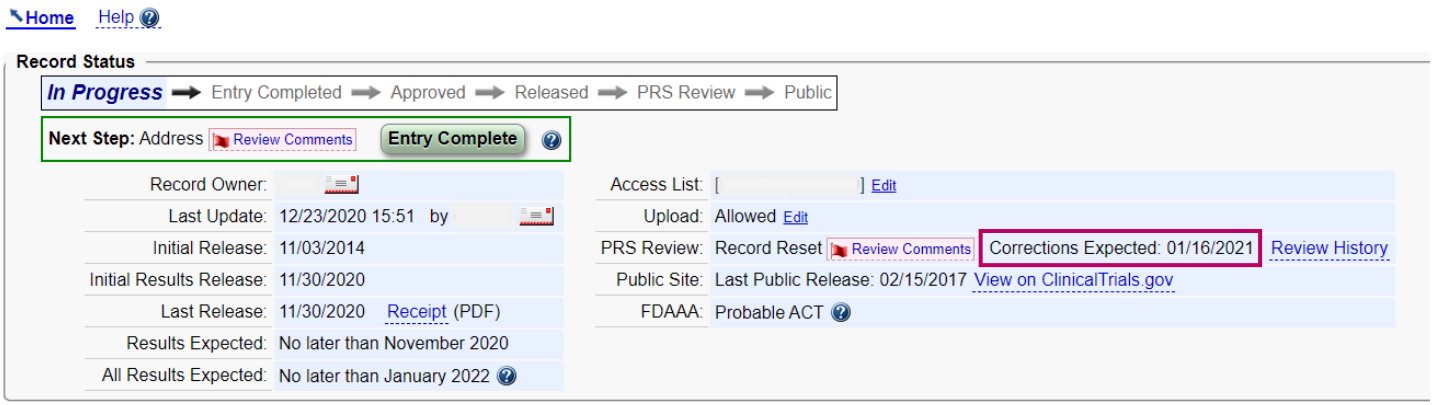
Please visit PRS (click here) for common questions about the updated QC and posting procedures for ACTs.

Is there a deadline for addressing PRS comments?

Yes. According to the changes implemented by the Final Rule, the Responsible Party will be required to address or correct any apparent errors, deficiencies and/or inconsistencies identified during NLM's QC review process within the following timelines from the date the comments are posted:

Registration information	Within 15 days
Results information	Within 25 days

If there are any comments that need to be addressed, an expected date of resolution (**Corrections Expected** date) will appear in the Record Status box on the Record Summary page as indicated below:



What happens if my study is noncompliant with the relevant ClinicalTrials.gov regulations?

You should either create or update your record as soon as possible to bring your study into compliance by registering the study and/or entering results in ClinicalTrials.gov.

Failure to comply may result in the issuance of a civil monetary penalty, Notice of Noncompliance, injunction, and/or criminal prosecution. As of January 17, 2020, the maximum civil money penalty for noncompliance for a single proceeding is **$12,316** [333(f)(3)(A)]**.** If the violation is not corrected within 30 days following the notification of the violation, the civil monetary penalty is **$12,316 per day** until the violation is corrected [333(f)(3)(B)]. The penalty amount is adjusted for inflation every year.

Link for reference: https://www.fda.gov/media/113361/download.

In addition to the fines and penalties listed above, noncompliance with registration and results submission can result in the following:

- Loss or an immediate hold/pause on NIH funds and/or other federal awards.
- Failure to publish results in a journal (See ICMJE guidelines).
- Damage to reputation due to public posting of non-compliance on the ClinicalTrials.gov record(s).
- Public posting of non-compliance with results submission on the FDAAA Trials Tracker.

Is there a way to search for noncompliance on ClinicalTrials.gov?

As of December 8, 2020, ClinicalTrials.gov has a new advanced search feature that provides the ability to search for Section 801 (FDAAA) violations in the Advanced Search field of the site.

A FDAAA 801 Violation is shown on a study record when the U.S. Food and Drug Administration (FDA) has issued a Notice of Noncompliance to the responsible party of an ACT. A Notice of Noncompliance indicates that the FDA has determined the responsible party was not in compliance with the registration or results reporting requirements for the clinical trial under the Food and Drug Administration Amendments Act of 2007, Section 801 (FDAAA 801).

NLM is required by FDAAA 801 to add information to a study record about any FDAAA 801 Violation(s). This information is provided by the FDA. There are three categories of information that may be included:

1. **Violation**: Shown when the FDA issues a Notice of Noncompliance and posts the Notice of Noncompliance on its designated webpage. There are three types of violations:

   ⇒ Failure to submit required clinical trial information
   ⇒ Submission of false or misleading clinical trial information
   ⇒ Failure to submit primary and secondary outcomes

2. **Correction**: Shown when the FDA confirms that the Responsible Party has updated the study record to correct the violation and posts the correction notice on its designated webpage.

3. **Penalty**: Shown when the FDA imposes a penalty for the violation and posts the penalty notice on its designated webpage.

Are there tutorials that can help me understand the registration and results entry process?

Yes. You can contact the Clinical Trials Office (CTO) at ClinicalTrialsGov@cumc.columbia.edu to schedule a walk-through of the process or for questions related to registration or results entry.

You can also visit us online at the Regulatory Affairs Section of the CTO website: https://research.columbia.edu/bbsessions-newsletters for additional brown bag session resources and relevant newsletters on this topic (Note: Login with a UNI and UNI password is required).

In addition, you can access official PRS tutorials provided by NLM here: https://prsinfo.clinicaltrials.gov/tutorial/content4/index.html#/.

REVISED COMMON RULE — Posting of Clinical Trial Informed Consents

What does the Revised Common Rule require?

The revised Common Rule (i.e., 2018 Rule or 2018 Requirements) requires one consent form be posted on a publicly available federal website within a specific time frame for any clinical trials* conducted or supported by a Common Rule department or agency.

In order to satisfy this new provision, the following must apply:

- The consent form must have been used in enrolling participants.
- Consent form is posted (1) after a study is closed to recruitment, and (2) where 60 or fewer days have passed since the last study visit.
- An unsigned, IRB-approved copy is posted on either ClinicalTrials.gov or Regulations.gov.

**Clinical Trial* is defined as a research study in which one or more human subjects are prospectively assigned to one or more interventions (which may include placebo or other control) to evaluate the effects of the interventions on biomedical or behavioral health-related outcomes.

What is the compliance date and what does it mean?

The general compliance date of the 2018 Common Rule is January 21, 2019. This means that HHS-conducted or supported research initiated on or after January 21, 2019 will need to comply with the revised Common Rule. The term "initiated" refers to the date on which: (1) research was initially approved by an institutional review board (IRB); (2) IRB review was waived pursuant to §46.101(i); or (3) a determination was made that the research was exempt.

What if the clinical trial closes to recruitment 61 or more days after the last study visit by any enrolled subject?

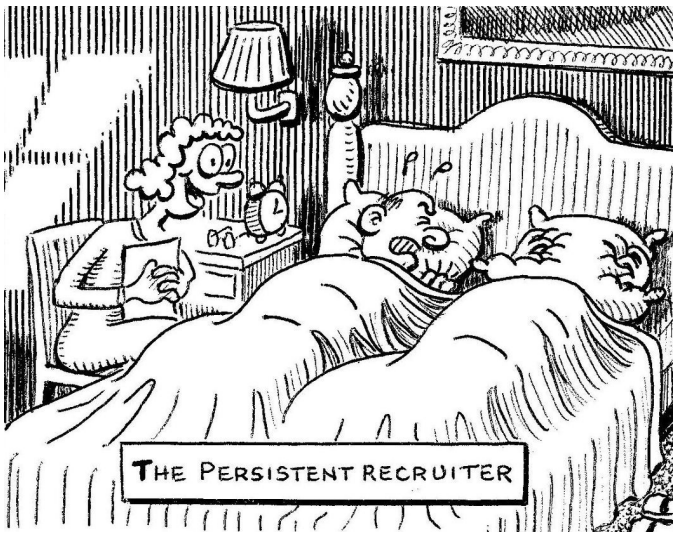
If a clinical trial closes to recruitment 61 or more days after the last study visit by any enrolled subject as required by the protocol, OHRP recommends that an informed consent form be posted within 60 days of when the study is closed to recruitment. If a consent form is posted before the study is closed to recruitment, the posting will NOT satisfy §46.116(h).

What procedures should I follow to comply with this new requirement?

If you have identified a study that requires posting of a consent form, please contact the IND/IDE Assistance Program (IAP) at INDHelp@cumc.columbia.edu for guidance on how to comply.

For more information on the revised Common Rule, please visit the HHS website or the HRPO website.

Research Funny



Clinical Trials Office (CTO)

Our mission is to facilitate quality clinical trial research by providing the CU research community with comprehensive administrative services that help move trials quickly from initial proposal through contract execution. We also provide regulatory support for FDA-regulated research.

We're on the Web!

Visit us at:
https://research.columbia.edu/clinical-trials-office

CRC Help:
CRCHelp@columbia.edu

IND/IDE Help:
INDHelp@cumc.columbia.edu

PRS Help:
ClinicalTrialsGov@cumc.columbia.edu

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