Best Practice Guide for Expedited Assessment of Multinational COVID-19 therapeutic trials

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Clinical Trials Facilitation and Coordination Group, note now transition to CTCG, Clinical Trials Coordination Group

The submitted proposal is under ongoing evaluation to be funded under the EU4Health programme

European Commission

EU4Health - CT Cure

Clinical Trials Regulation - applies since 31 Jan 2022

Strengthening EU as region for clinical trials

Harmonising approval procedures and coordinated assessment of multinational clinical trials

Single decision per Member State (including both national competent authorities and ethics committees)

Strictly defined timelines - tacit approval if not followed

Increased transparency

Transitional period and transition of trials already authorised under national laws (Clinical Trials Directive 2001/20/EC)

Clinical Trials Regulation - applies since 31 Jan 2022

Article 3

General principle

A clinical trial may be conducted only if:

(a) the rights, safety, dignity and well-being of subjects are protected and prevail over all other interests; and

(b) it is designed to generate reliable and robust data.

Best practice - identification and assessment of clinical trials on COVID-19 therapeutics

Assessment timelines for multinational trial applications shortened 36-55% compared to Clinical Trial Regulation maximum timelines

Fixed timelines for assessment subphases

Sponsors submitting complete trial application dossiers (not requiring an RFI, Request For Information) **benefit most from accelerated assessment**

- Rolling reviews of trial applications not applicable
- Expedited assessment should not compromise the quality of the scientific and ethical review as outlined in Article 4 of the Clinical Trials Regulation

Best practice - identification and assessment of clinical trials on COVID-19 therapeutics

Full submissions Part I and Part II preferred

Sponsors encouraged to seek advice before submission and also inform the CT-CURE team (EU4HEALTH_CT-CURE@fagg-afmps.be)

- **central advice**
- **national (or simultaneous organized by EU-Innovation Network)**

Sponsors recommended to inform intended MSCs about planned submissions two weeks in advance

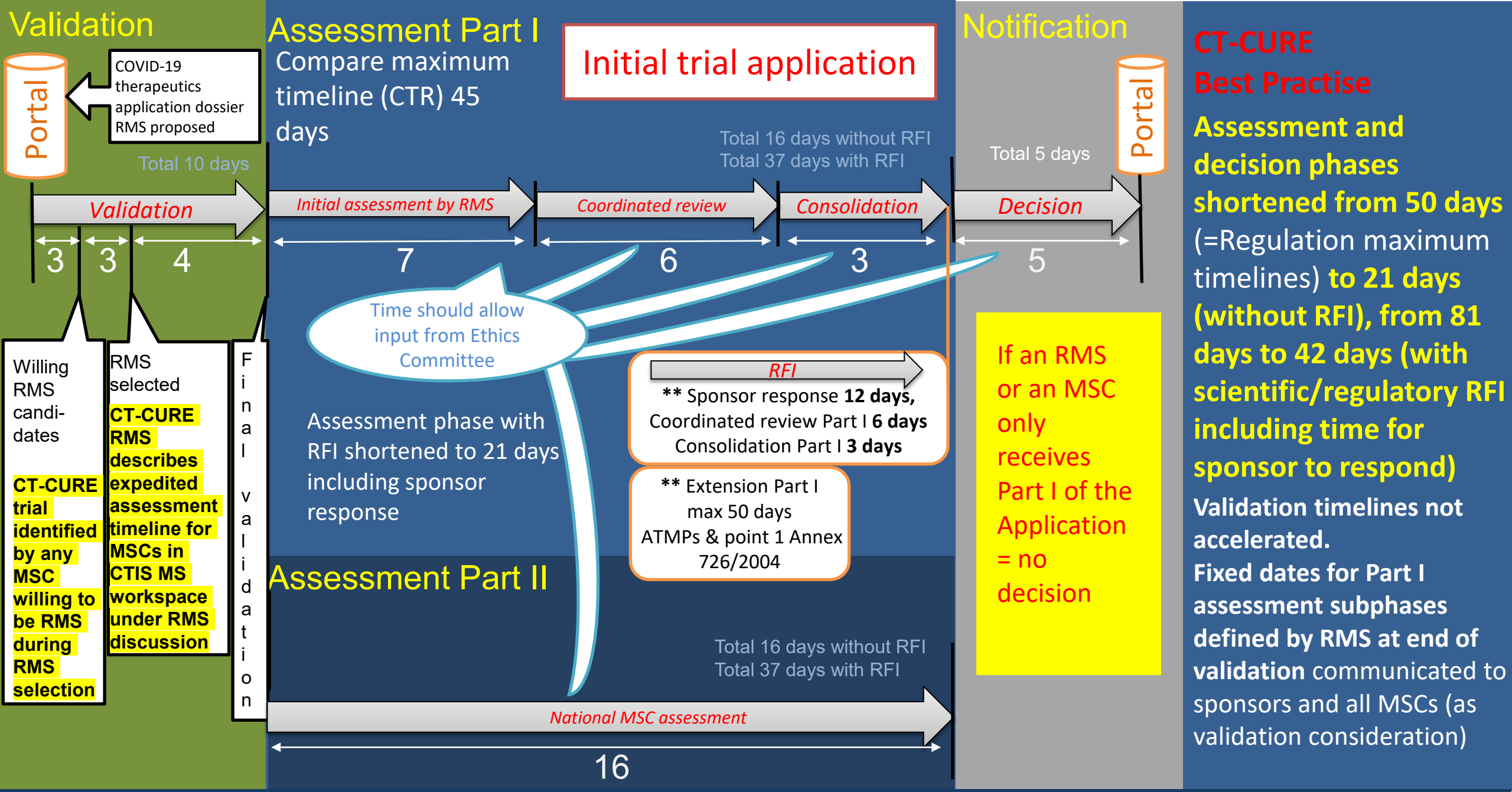
Exchange between Member States via secure links on advice activities relevant for CT-CURE also shared with CTCG/CTEG Members

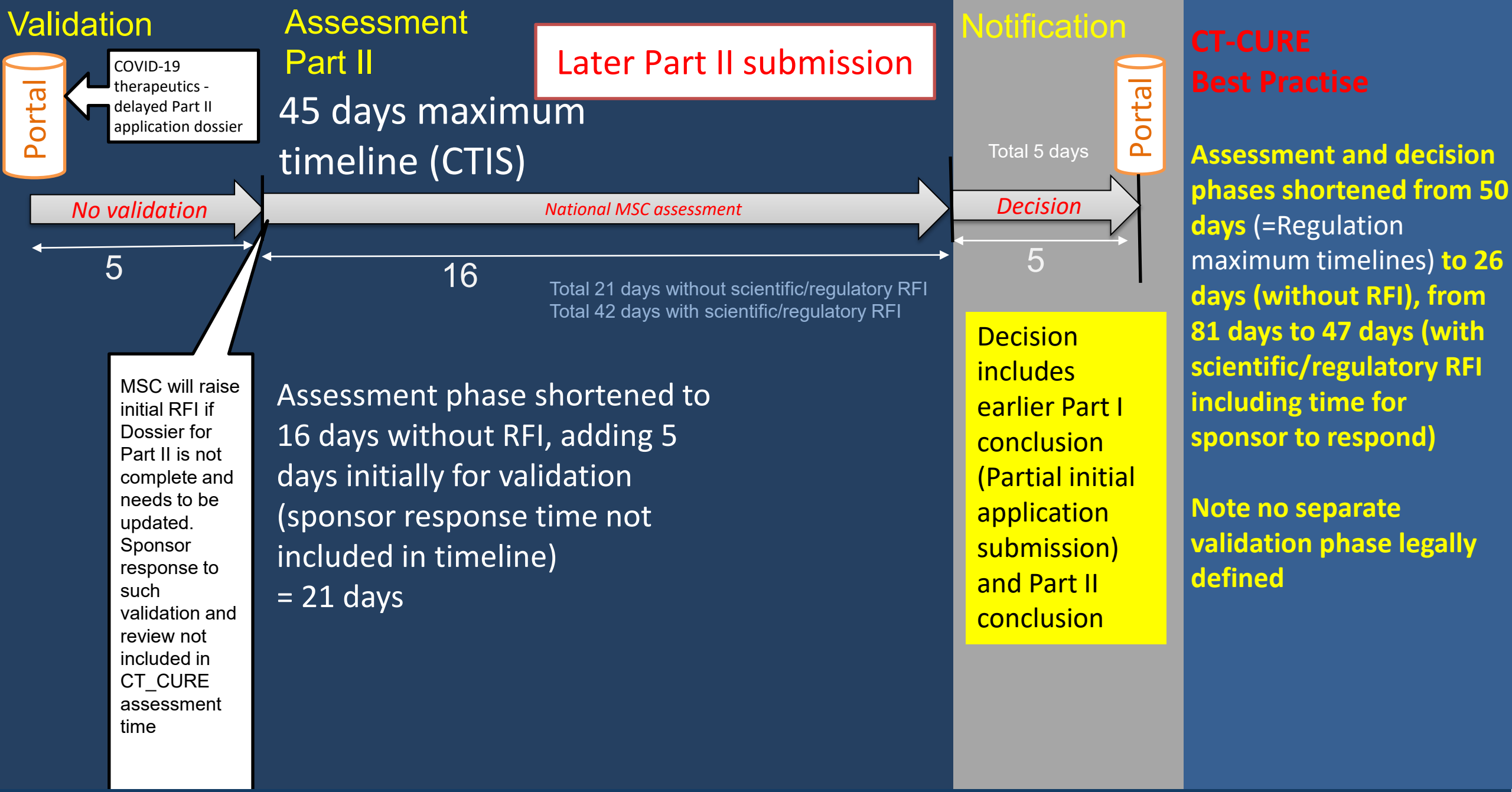
Focus on new multinational clinical trial applications evaluating safety and efficacy of COVID-19 therapeutics

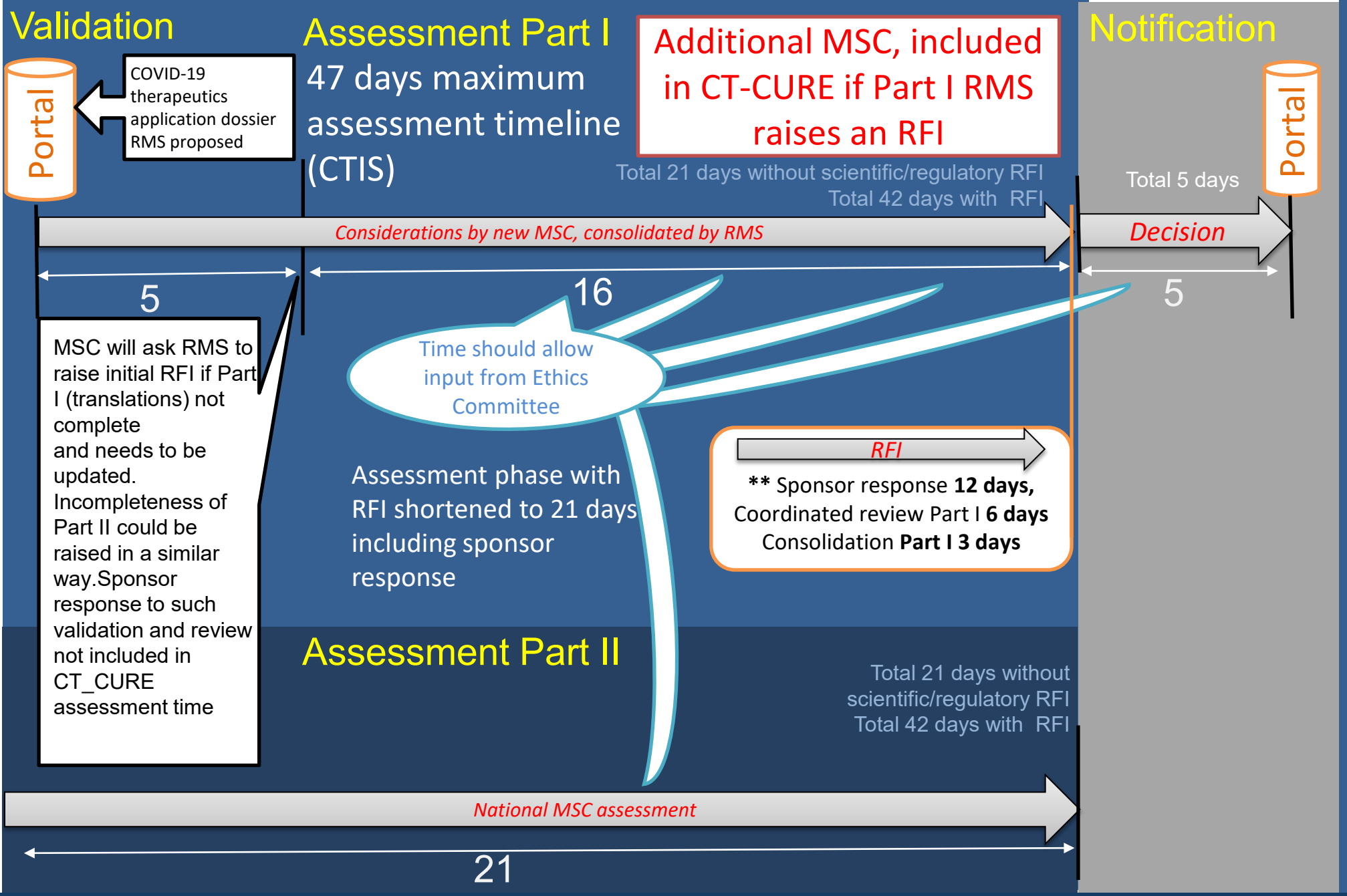
All Member States Concerned (also outside Joint Action Consortium of EU/EEA Member States) expected to support the expedition of assessments for Part I with novel COVID-19 therapeutic products

Likely that Part II assessment (national matters as defined in CTR, e.g. ethics committee review of informed consent and subject information) and as a consequence the decision on the application will be followed only by Member States participating in CT-CURE

Important to seek advice from intended Member States Concerned and preferably provide a presubmission notice two weeks prior submission


Validation
Portal
COVID-19 therapeutics application dossier RMS proposed
Total 10 days
Validation
3
3
4
Willing RMS candi-dates
CT-CURE trial identified by any MSC willing to be RMS during RMS selection
RMS selected
CT-CURE RMS describes expedited assessment timeline for MSCs in CTIS MS workspace under RMS discussion
Final validation
Assessment Part I
Compare maximum timeline (CTR) 45 days
Initial trial application
Total 16 days without RFI
Total 37 days with RFI
Initial assessment by RMS
Coordinated review
Consolidation
7
6
3
Time should allow input from Ethics Committee
Assessment phase with RFI shortened to 21 days including sponsor response
RFI
** Sponsor response 12 days,
Coordinated review Part I 6 days
Consolidation Part I 3 days
** Extension Part I max 50 days ATMPs & point 1 Annex 726/2004
Assessment Part II
Total 16 days without RFI
Total 37 days with RFI
National MSC assessment
16
Notification
Total 5 days
Portal
Decision
5
If an RMS or an MSC only receives Part I of the Application = no decision
CT-CURE
Best Practise
Assessment and decision phases shortened from 50 days (=Regulation maximum timelines) to 21 days (without RFI), from 81 days to 42 days (with scientific/regulatory RFI including time for sponsor to respond)
Validation timelines not accelerated.
Fixed dates for Part I assessment subphases defined by RMS at end of validation communicated to sponsors and all MSCs (as validation consideration)


Validation
Assessment Part II
Later Part II submission
Notification
Portal
COVID-19 therapeutics - delayed Part II application dossier
45 days maximum timeline (CTIS)
Portal
Total 5 days
No validation
National MSC assessment
Decision
5
16
5
Total 21 days without scientific/regulatory RFI
Total 42 days with scientific/regulatory RFI
MSC will raise initial RFI if Dossier for Part II is not complete and needs to be updated. Sponsor response to such validation and review not included in CT_CURE assessment time
Assessment phase shortened to 16 days without RFI, adding 5 days initially for validation (sponsor response time not included in timeline) = 21 days
Decision includes earlier Part I conclusion (Partial initial application submission) and Part II conclusion
CT-CURE Best Practise
Assessment and decision phases shortened from 50 days (=Regulation maximum timelines) to 26 days (without RFI), from 81 days to 47 days (with scientific/regulatory RFI including time for sponsor to respond)
Note no separate validation phase legally defined



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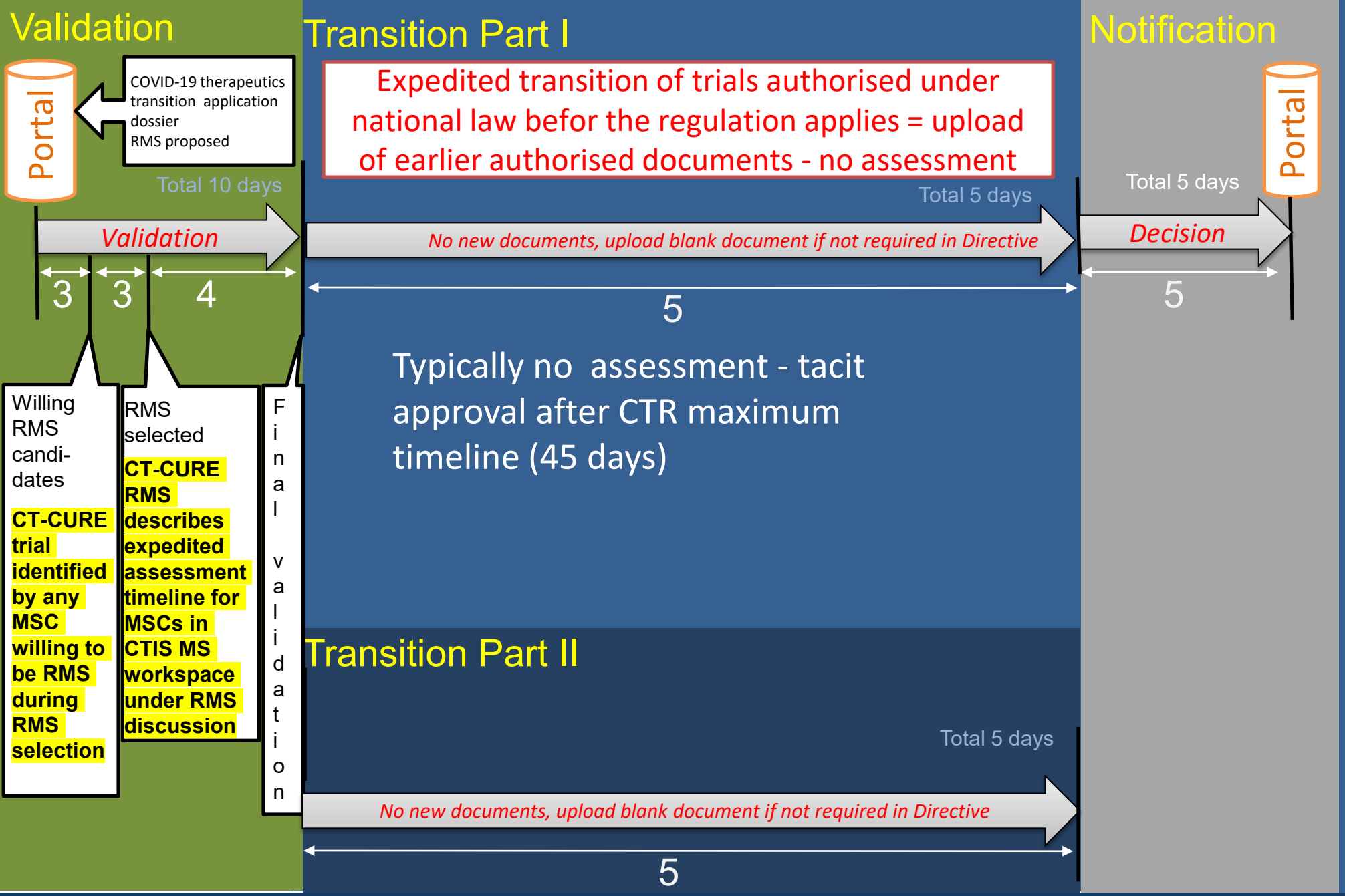
Assessment and decision phases shortened from 52 days (=Regulation maximum timelines) **to 26 days (without scientific/regulatory RFI), from 83 days to 47 days (with RFI including time for sponsor to respond)**

Note no separate validation phase legally defined

Fixed dates for Part I RFI response assessment subphases defined by RMS if RFI sent to sponsor communicated to sponsors and all MSCs (as a consideration)

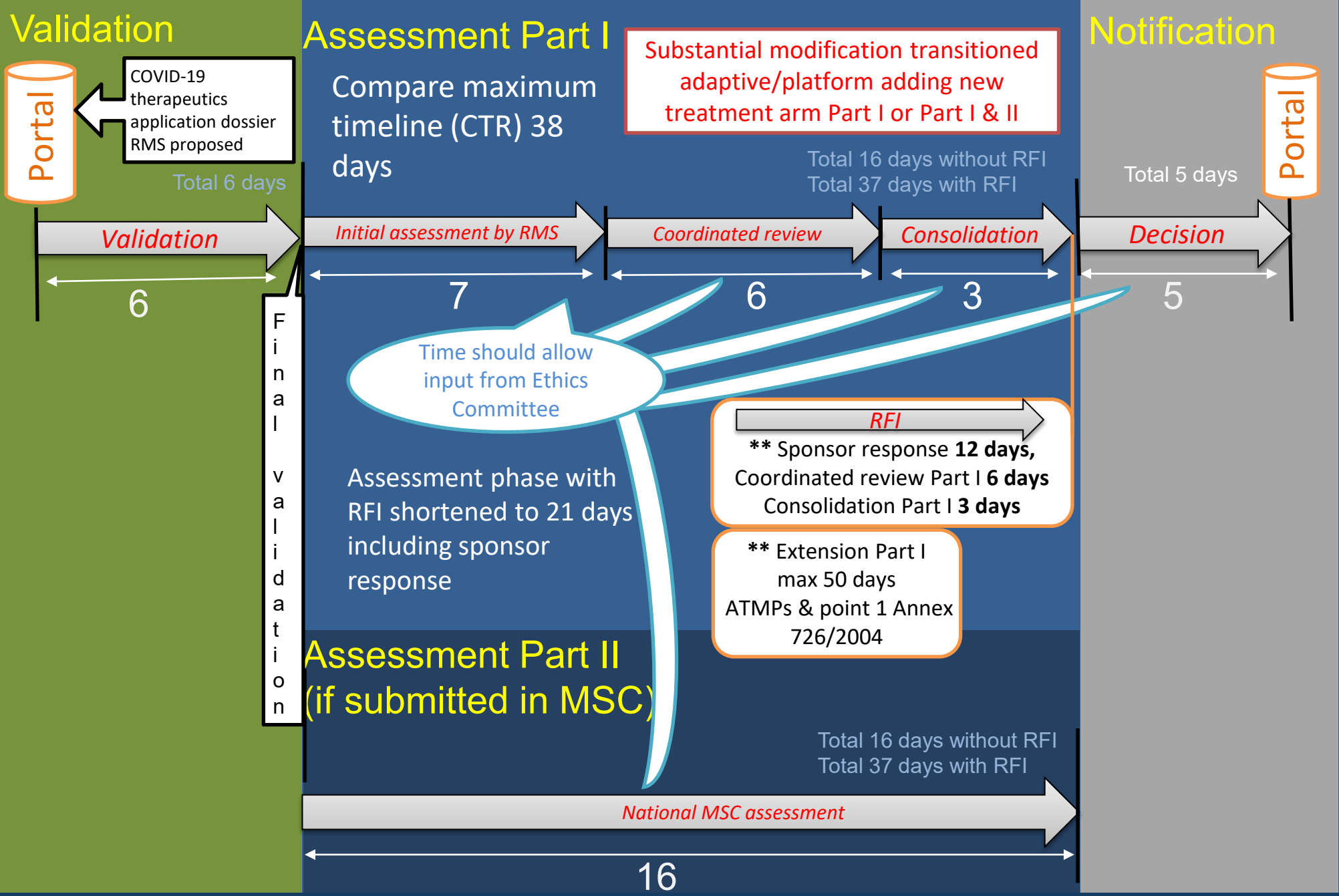


CT-CURE Best Practise

Assessment and decision phases shortened from 50 days (=Regulation maximum timelines, tacit approval proposed in COM QnA) **to 10 days**

Validation timelines not accelerated.
Fixed dates for Part I defined by RMS at end of validation communicated to sponsors and all MSCs (as validation consideration)

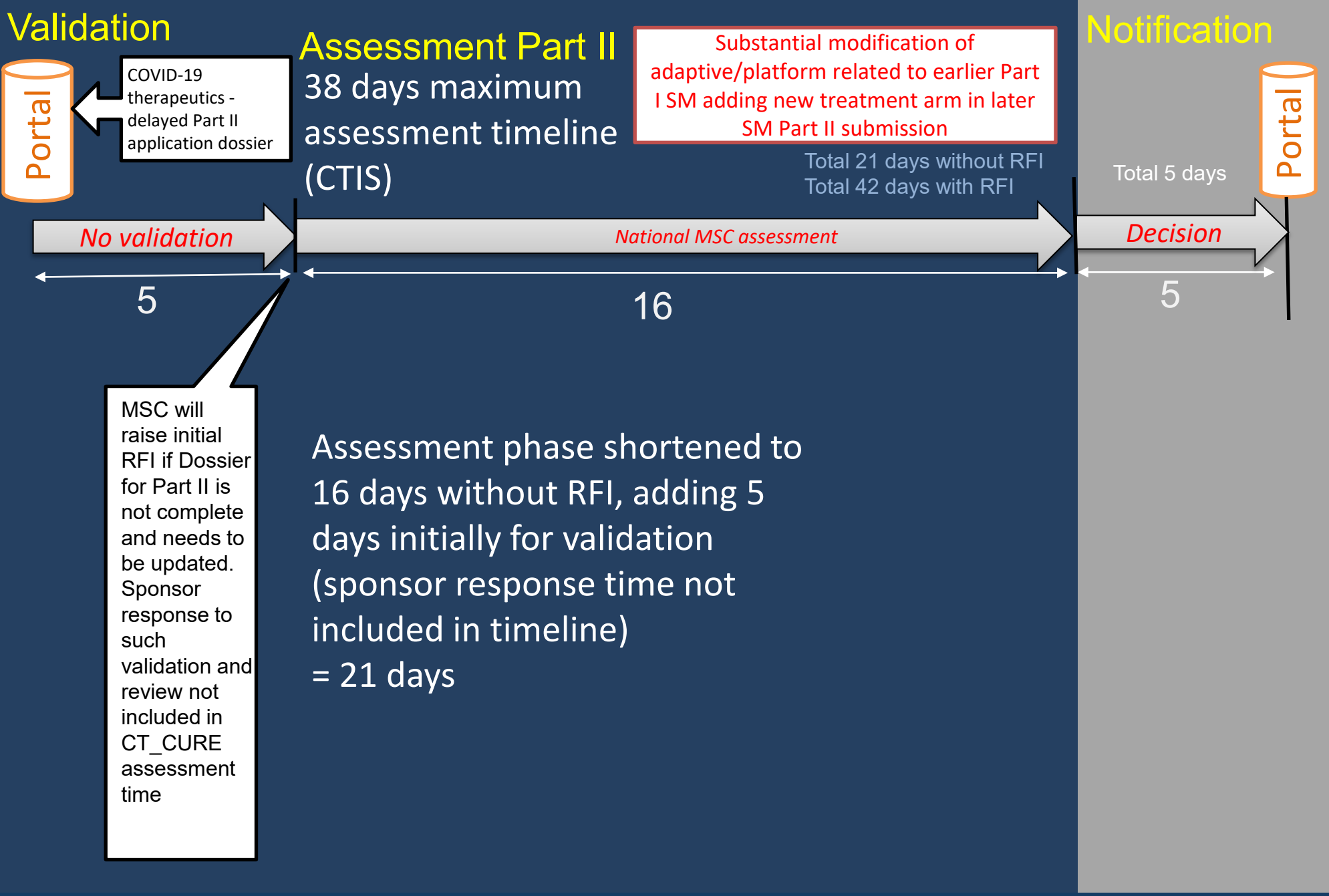
Note: Transition normally without assessment.
In case of assessment and RFI to sponsor, timeline as initial application Part I and Part II



CT-CURE
Best Practise

Assessment and decision phases shortened from 43 days (=Regulation maximum timelines) **to 21 days (without scientific/regulatory RFI), from 74 days to 42 days (with RFI including time for sponsor to respond)**

Validation timelines not accelerated
Fixed dates for Part I defined by RMS at end of validation communicated to sponsors and all MSCs (as validation consideration)



CT-CURE Best Practise

Assessment and decision phases shortened from 43 days (=Regulation maximum timelines) **to 26 days (without RFI), from 74 days to 47 days (with scientific/regulatory RFI including time for sponsor to respond)**

Note no separate validation phase legally defined

Thanks for your attention!

Questions welcome

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