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SCIENCE MEDICINES HEALTH

# CTIS publication rules: How CTIS supports access to clinical trial data

**Practical implications of transparency in CTIS**

# CTIS User groups have dedicated work spaces

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Sponsors: industry and academia

Marketing authorisation applicants

Member States *NCAs and ethics committees

European Commission

European Medicines Agency

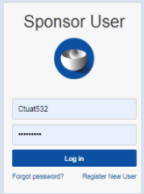
General public

*National competent authorities

**secure access**

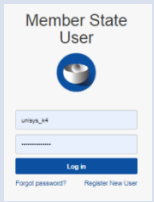
**open access**

sponsor workspace




**EU Portal**

authority workspace




public website

EU CT Database

Data accessible to the public

# Legal basis for transparency in the Regulation (EU) No 536/2014



Article 81(4) outlines the requirements for transparency in CTIS:

*4. The EU database shall be publicly accessible unless, for all or part of the data and information contained therein, confidentiality is justified on any of the following grounds:*

*(a) protecting personal data in accordance with Regulation (EC) No 45/2001;*

*(b) protecting commercially confidential information, in particular through taking into account the status of the marketing authorisation for the medicinal product, unless there is an overriding public interest in disclosure;*

*(c) protecting confidential communication between Member States in relation to the preparation of the assessment report;*

*(d) ensuring effective supervision of the conduct of a clinical trial by Member States*

# Disclosure rules of clinical trial information in CTIS

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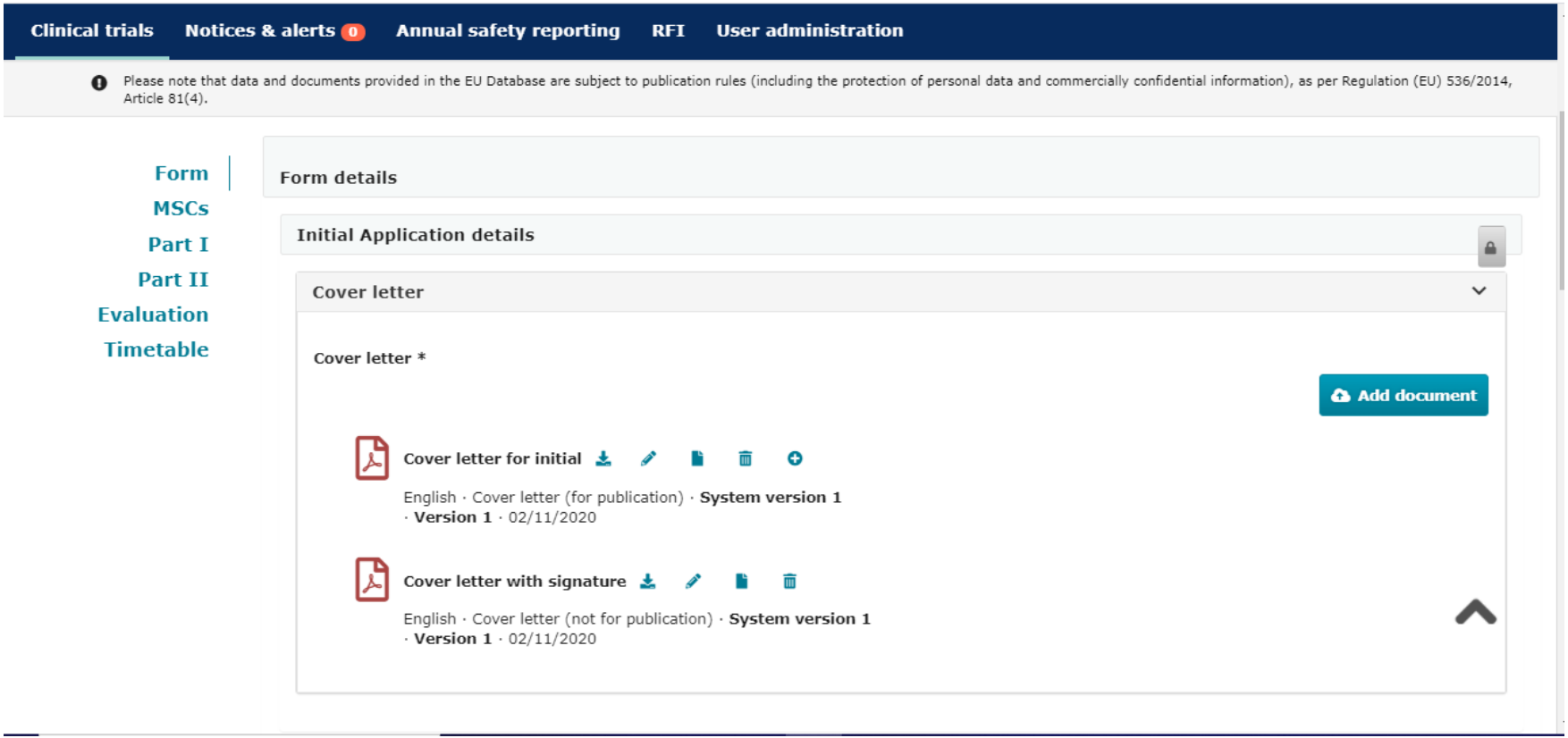
- Only applications on which a **decision** (any decision) has been reached by the Member State Concerned will be made public;
- All data and documents in the CTIS will be made public, with few exceptions;
- The default is always to make public at the first opportunity;
- Sponsors and Authority users (MSs and European Commission) will have the possibility to upload documents version 'for publication' and 'not for publication' to protect personal data, if needed;
- Commercially Confidential Information (CCI) is expected to be addressed mainly by the deferral mechanism;

Disclosure rules detailed in: https://www.ema.europa.eu/en/documents/other/appendix-disclosure-rules-functional-specifications-eu-portal-eu-database-be-audited_en.pdf

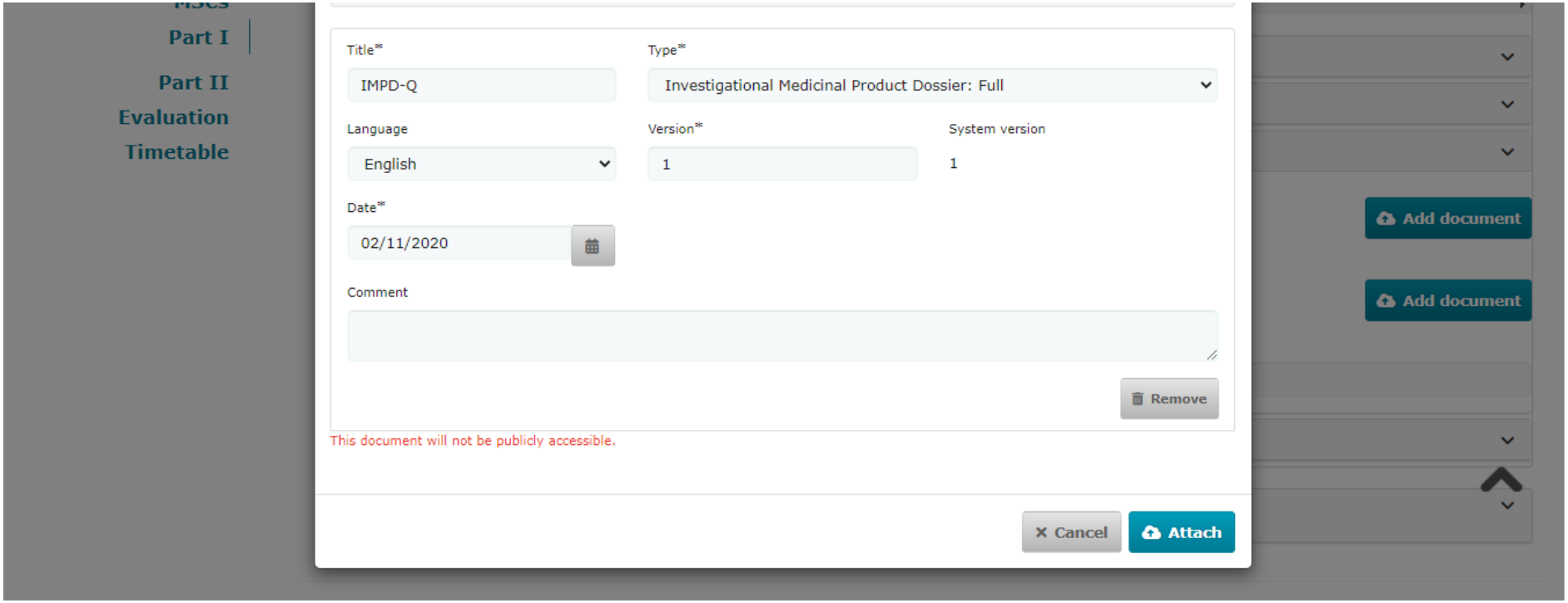
# What will not be made public

- Quality related information that include:
  - ❑ The IMPD quality
  - ❑ Quality related request of information (RFI) raised during the assessment
  - ❑ Quality Assessment reports (draft and final)
- Any draft assessment reports;
- Versions of documents that are '**not for publication',** which may include personal information identifying Member States experts, sponsor staff, MAH/applicant staff, as needed;
- Financial agreements between the sponsor and the investigator site.

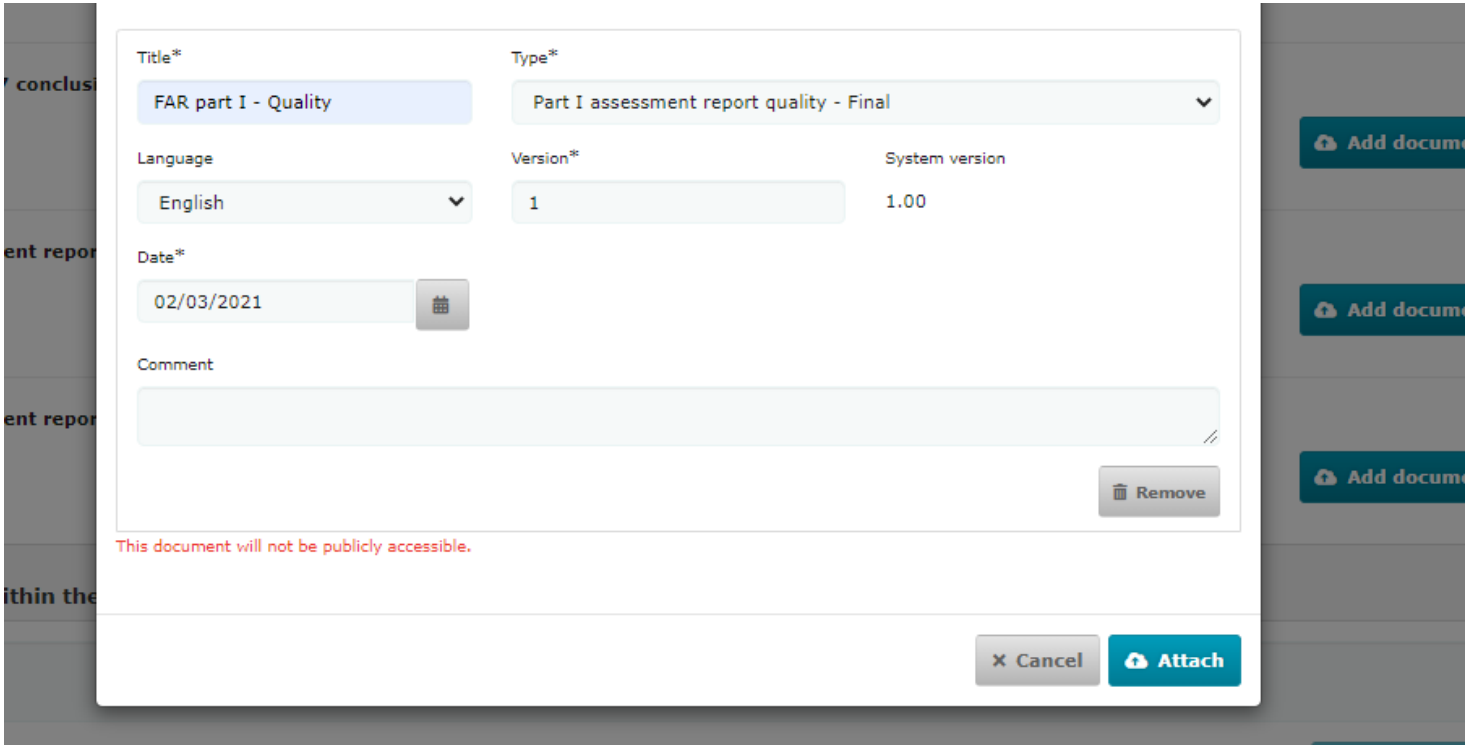
# Sponsor document: cover letter



# Sponsor document: IMPD-Q never published



# RMS doc: final quality assessment report part I - never published



# RMS doc: final assessment report part I – except quality

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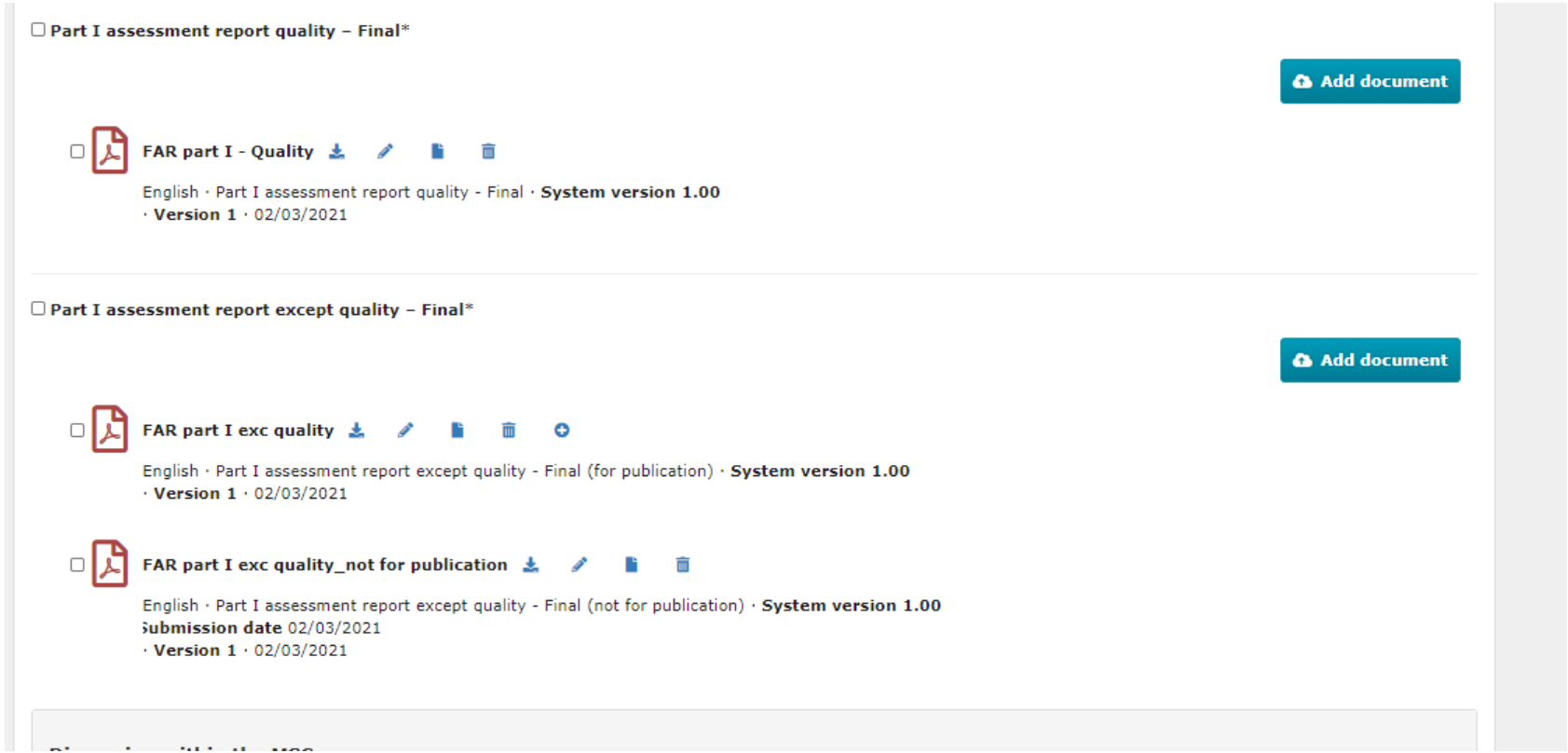
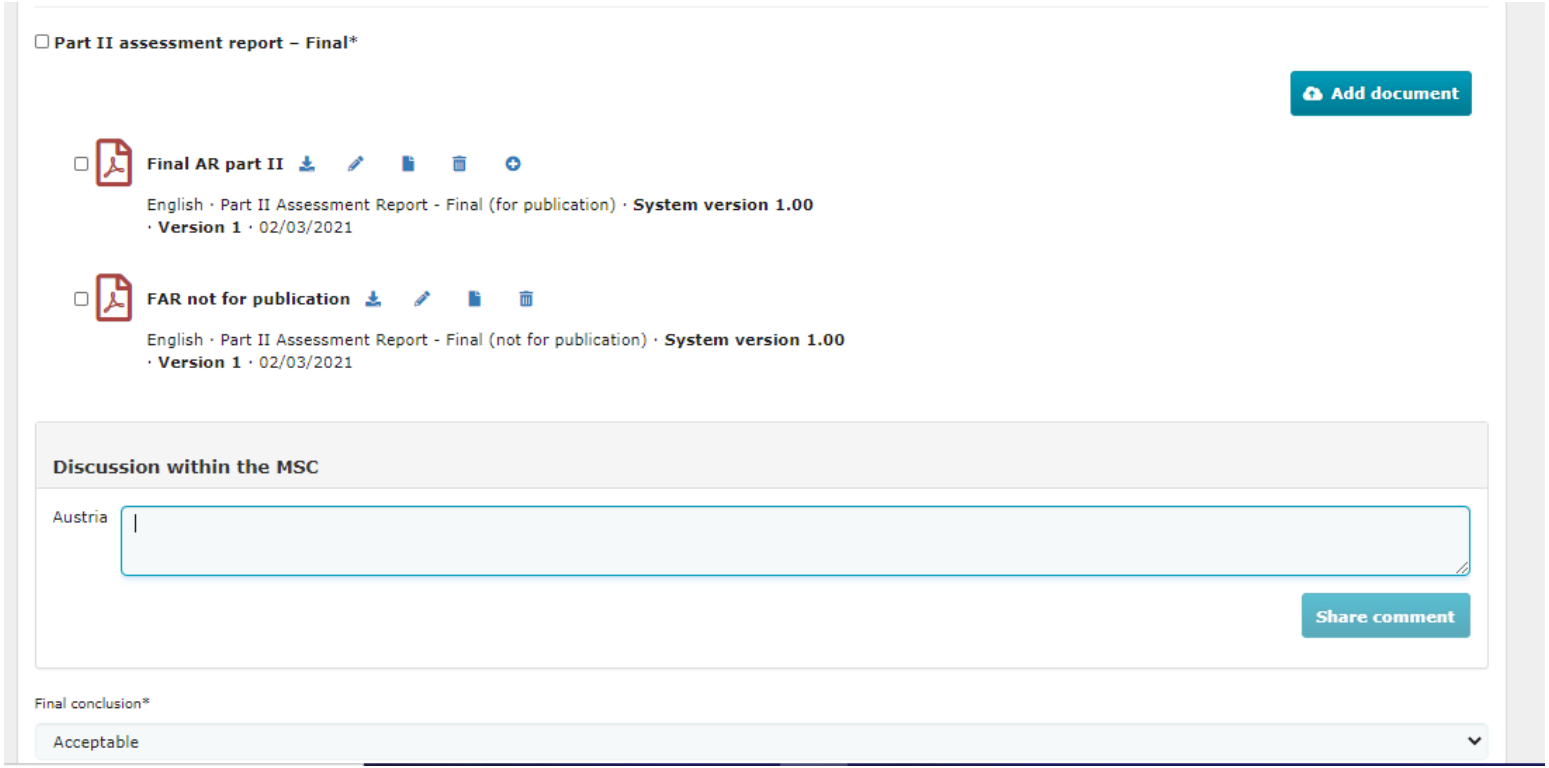


# MSC document: final assessment report part II



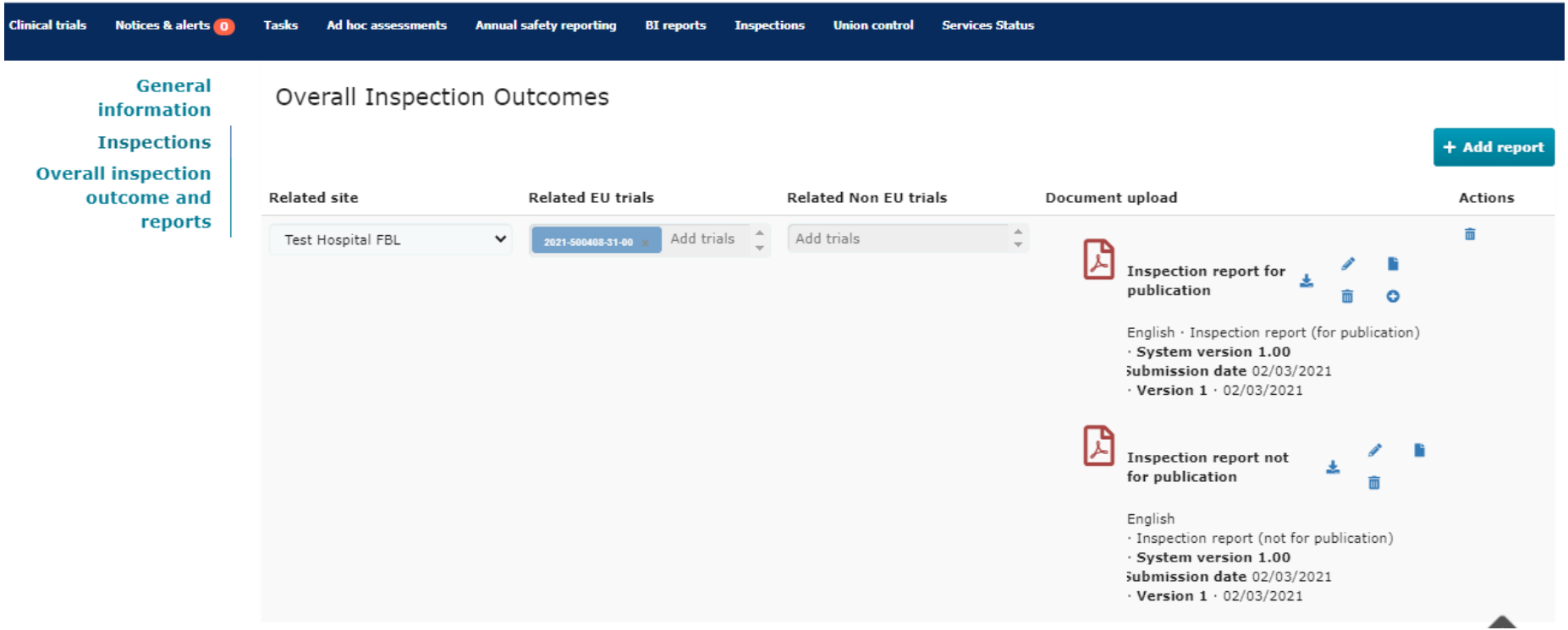
# Inspection information provided in CTIS

- An inspection record can contain information on one or more site inspected;
- Each site contains details of one or more clinical trial(s) inspected;
- At the end of the inspection process, final inspection reports can be uploaded in the system by EU MS inspectors for each site/trial combination, as applicable

*(e.g. one inspection report per one site and one trial, one inspection report for one site and multiple trials)*

- Like for the other documents in CTIS, a version of the inspection report 'for publication' and 'not for publication' can be uploaded in the system, as needed;
- No identifiable personal data of trial subjects should be publicly accessible.

# Inspection information provided in CTIS



# Inspection information in CTIS

**Publication rules:**

- Publication of the inspection report(s) will occur when all the sites and the trials in the inspection record have a corresponding inspection report ;
- In case of inspections done in the context of a marketing authorisation application, inspection report(s) will be published when the Clinical study report (CSR) will be provided in CTIS by the Marketing authorisation applicant;
- Publication of inspection reports cannot be deferred;
- Sponsors are responsible to provide in CTIS also inspection reports for inspections carried out by third countries authorities. These reports are published as soon as they are submitted and publication cannot be deferred.

# Deferral rules in CTIS

# Deferral rules in CTIS

- By completing the CTA sponsors can apply for a request for deferral, to delay publication of certain clinical trial data and documents;
- If the sponsor applies for a deferral, then RMS/MSC can also defer publication of certain documents up to the same period of time as selected by the sponsor or for a shorter period;
- **RMS** can defer the publication of information related to **part I**, for request for information (RFI), final assessment reports and conclusions;
- **MSC** can defer the publication of information related to **part II**, for request for information (RFI), final assessment reports and conclusions.

# Deferral rules for sponsors

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| Actor | Grouping | Category 1<br>FIH, PK/PD, BE/BA, Bio similarity | Category 2<br>Phase II and III | Category 3<br>Phase IV |
|---|---|---|---|---|
| Sponsor | • Main Characteristics | Publication of final **summary of results** | | |
| Sponsor | • Notifications | Publication of final **summary of results** | | |
| Sponsor | • Subject information sheet | Up to **7 years** after the end of the trial in EU/EEA | Up to **5 years** after the end of the trial in EU/EEA | |
| Sponsor | • Protocol | Up to **7 years** after the end of the trial in EU/EEA | Up to **5 years** after the end of the trial in EU/EEA | Publication of final **summary of results** |
| Sponsor | • IMPD S&E sections and Investigator Brochure | Up to **7 years** after the end of the trial in EU/EEA | Up to **5 years** after the end of the trial in EU/EEA | Publication of final **summary of results** |
| Sponsor | • Responses to RFI | Up to **7 years** after the end of the trial in EU/EEA | Up to **5 years** after the end of the trial in EU/EEA | Publication of final **summary of results** |
| Sponsor | • Clinical trial results summary for an intermediate data analysis | 1. 12 months after interim analysis date<br>2. up to **30 months** after the end of the trial in the EU/EEA | | |
| Sponsor | • Clinical trial results summary and lay person summary | 1. 12 months after the end of trial date in the EU/EEA<br>2. Up to **30 months** after the end of trial in the EEA | | |

# Example: sponsor can request deferral for publication of CT information

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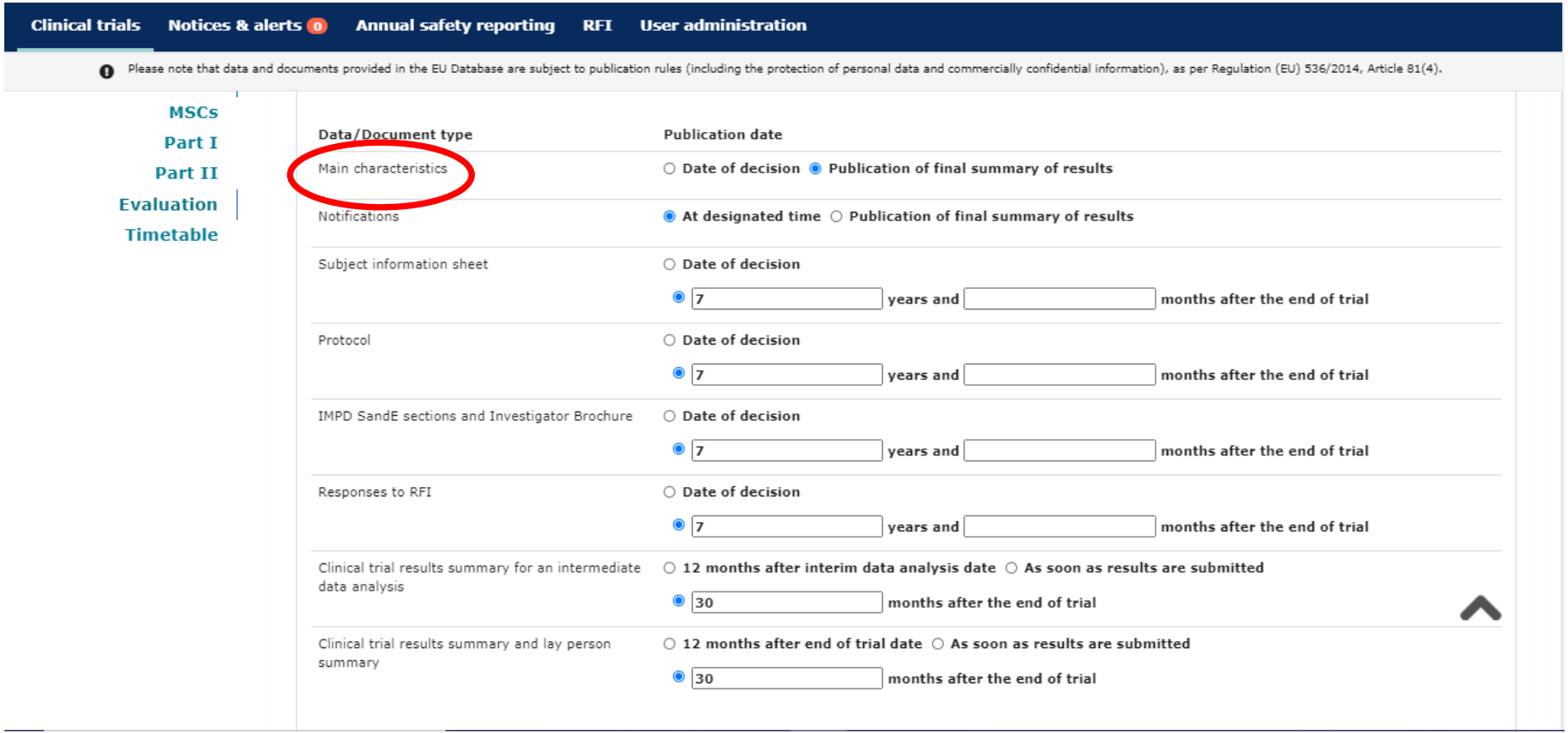

# Main characteristics that be deferred **for category 1** trials

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A **non-exhaustive** list of the clinical trial **main characteristics** for which publication can be deferred, include, but is not limited to:

- trial title,
- protocol code, trials design, therapeutic intent,
- main objective,
- secondary objective,
- endpoints,
- inclusion and exclusion criteria,
- treatment arms, treatment population and number of subjects,
- identification of the investigational medicinal products (IMPs).

*Of note, deferral of main characteristics is possible only for **category 1 trials.***

# Fields **always** published, even in case of deferral

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- EU Clinical Trial Number,
- Sponsor name and address,
- Nature of clinical trial (e.g. bioequivalence in 24 healthy volunteers),
- Decision outcome on the trial application and date of decision,
- Date of start of the trial,
- Dates of start and end of recruitment,
- Date of end of the trial in the Member State(s) in the EEA, and globally (including early termination of the trial),
- Principal Investigator Curriculum Vitae,
- Suitability of the facilities

*Of note, these fields are always published at time of decision and* ***regardless of trial category***

# Example: RMS/MSC can apply deferral for publication of CT information

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Decision

Authorised

**Publication of RFIs**

| Data/document type | Publication timepoint |
|---|---|
| Responses to RFIs | **4 years and 0 month after the end of trial (set by sponsor)** |
| RFIs sent to the sponsor | ○ Date of Decision<br>◉ 4 years and 0 months after the end of trial |

**Publication of assessment reports and conditions**

| Data/document type | Publication timepoint |
|---|---|
| Protocol | **7 years and 0 month after the end of trial (set by sponsor)** |
| IMPD S&E and Investigator Brochure | **6 years and 0 month after the end of trial (set by sponsor)** |
| Assessment reports and conditions | ◉ 7 years and 0 months after the end of trial |

Any deferrals set by the MSC/RMS apply to the relevant MSC/RMS's Part II requests for information, Part II assessment reports, conditions on Part II conclusion and conditions on the decision.

Any deferrals set by the RMS also apply to Part I requests for information, Part I assessment reports and conditions on the Part I conclusion.

The deferrals set as part of submitting the decision on the initial application also apply to subsequent applications throughout the life of the trial.

Supporting documentation

Add document

# CTIS public website- publication aspects

# CTIS Public website: Category 1 with no deferral

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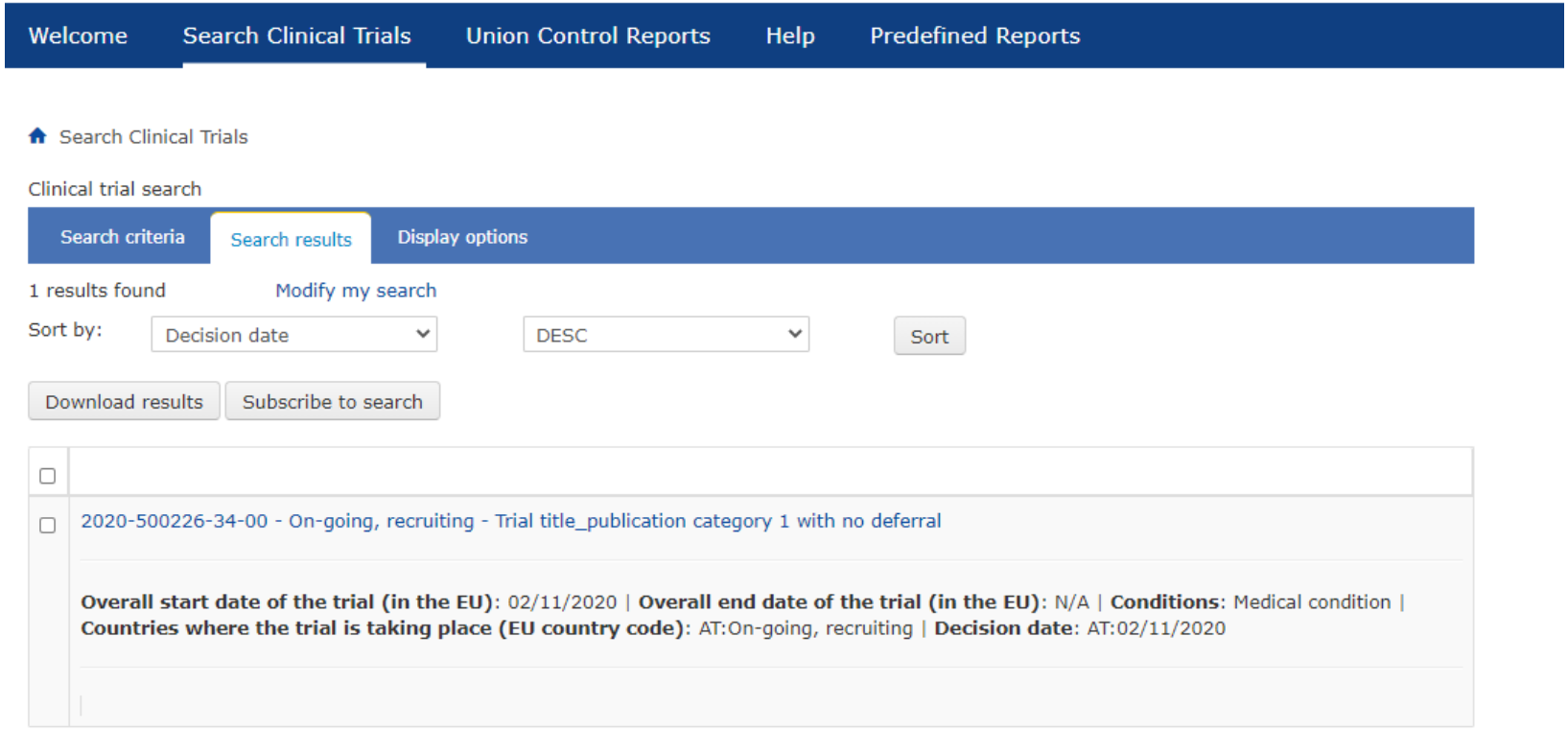

# CTIS Public website: Category 1 with no deferral

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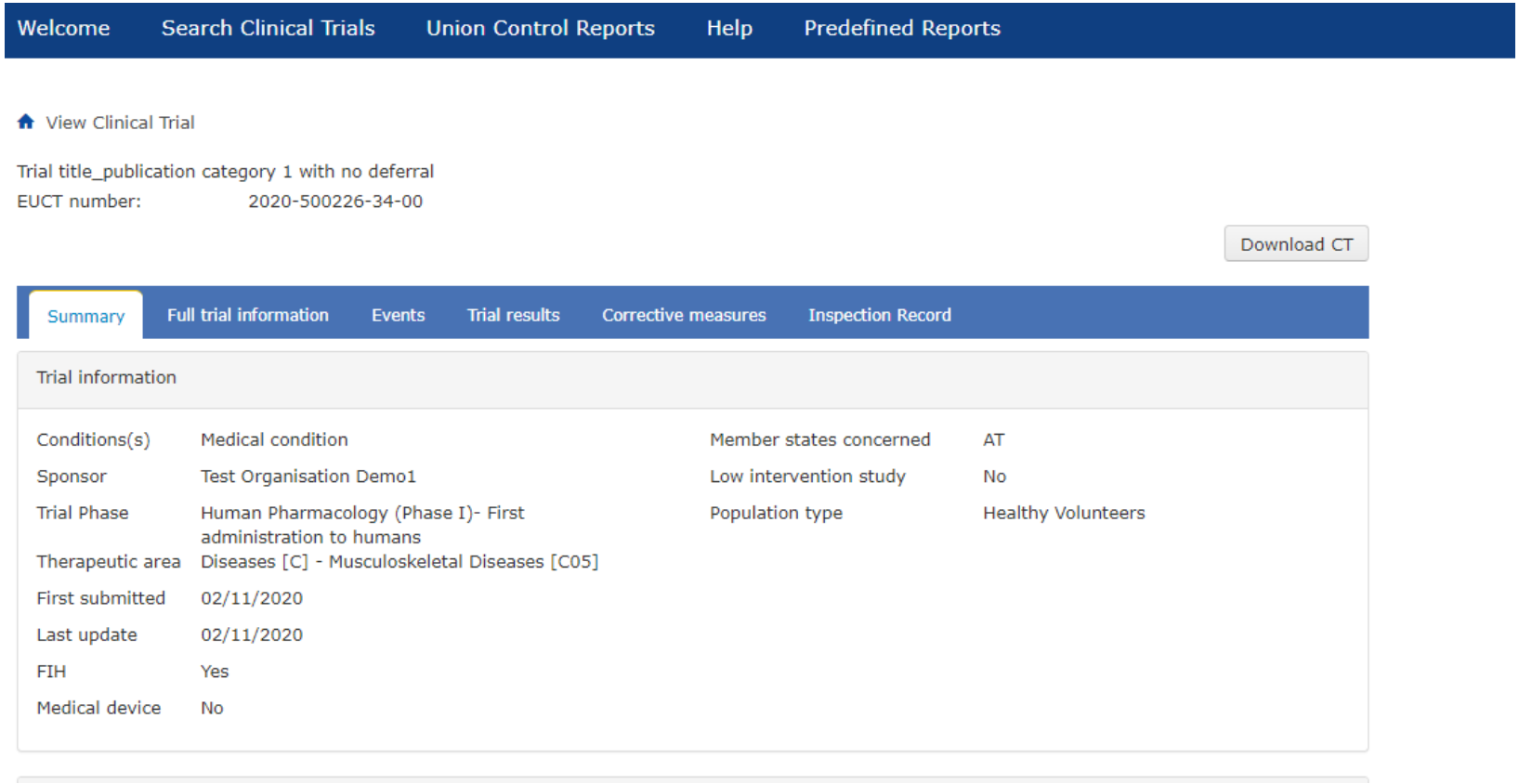

# CTIS Public website: category 1 with deferral on main characteristics

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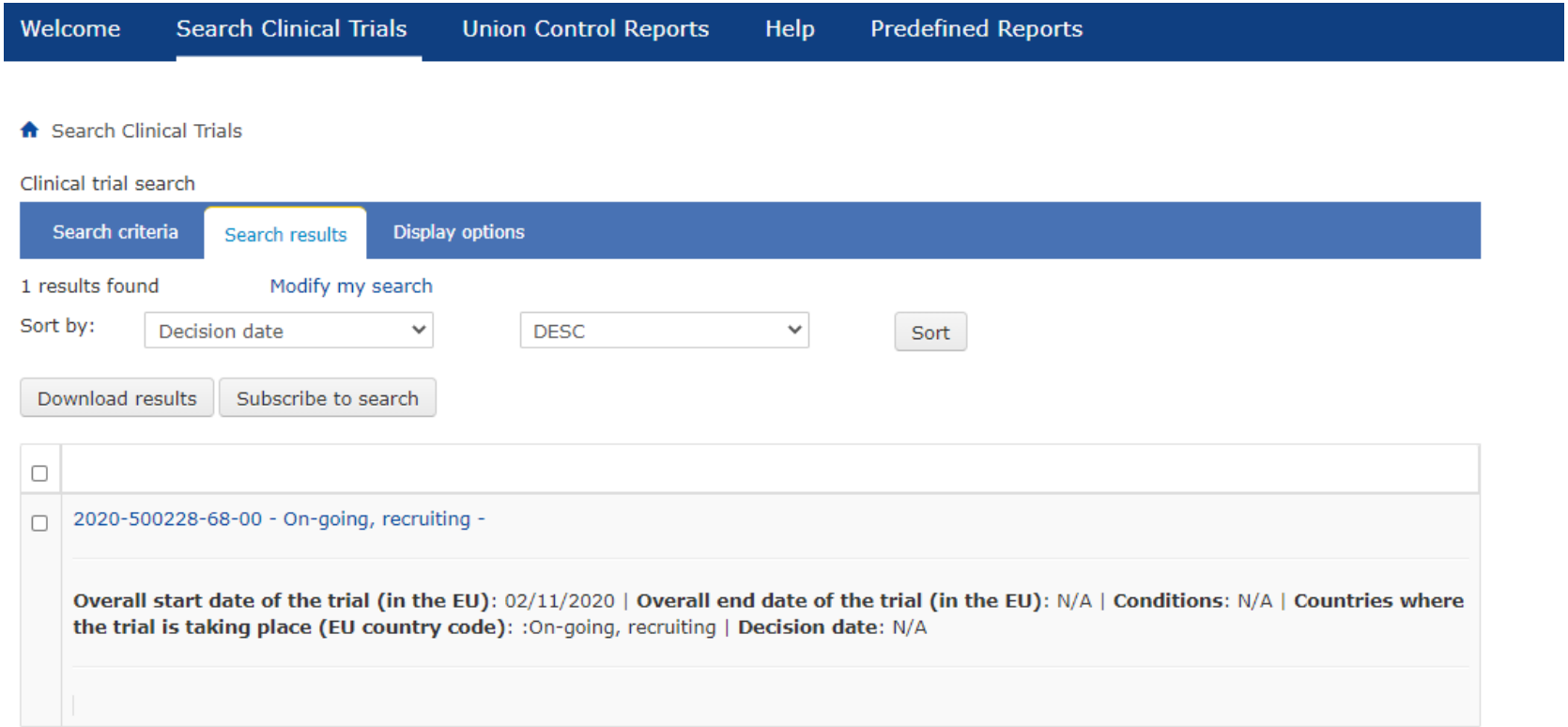

# CTIS Public website: category 1 with deferral on main characteristics

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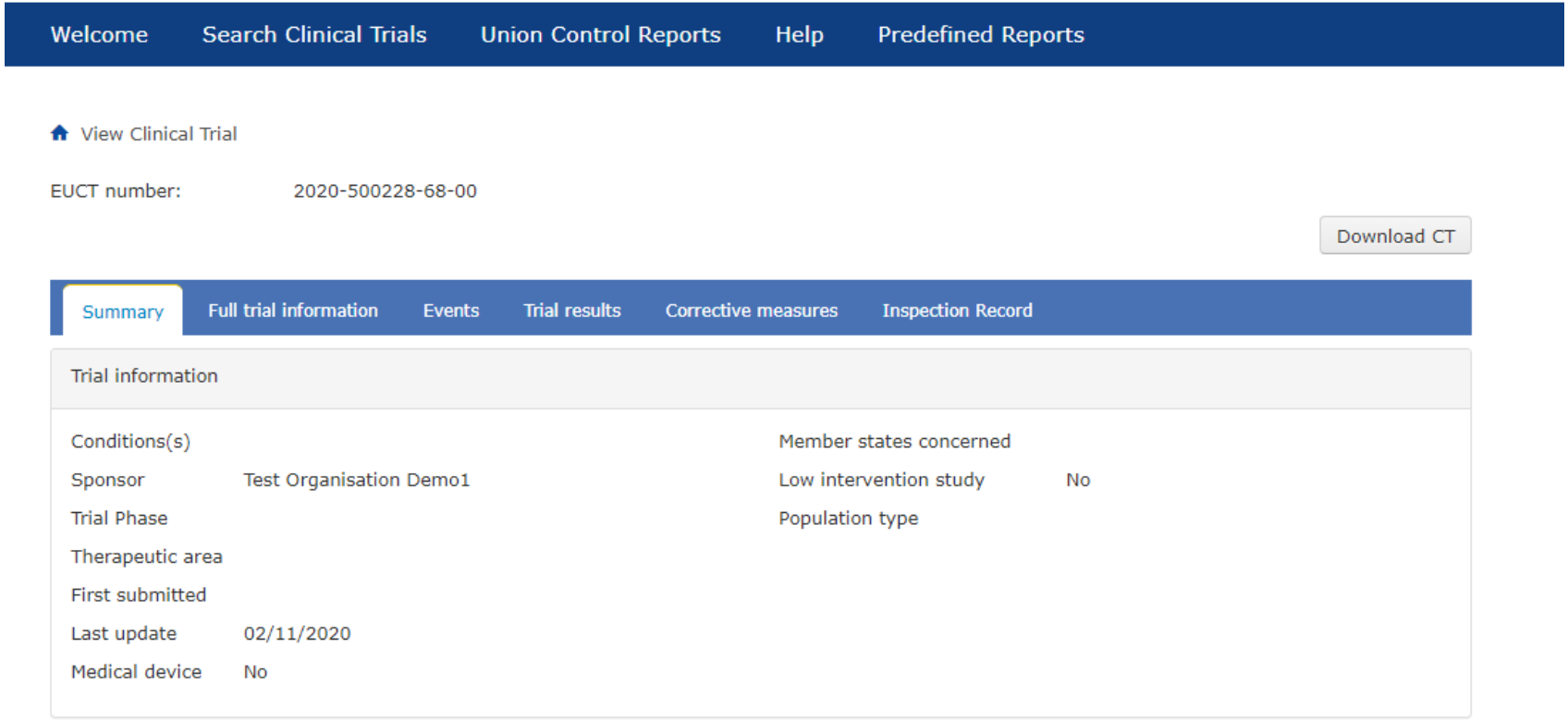
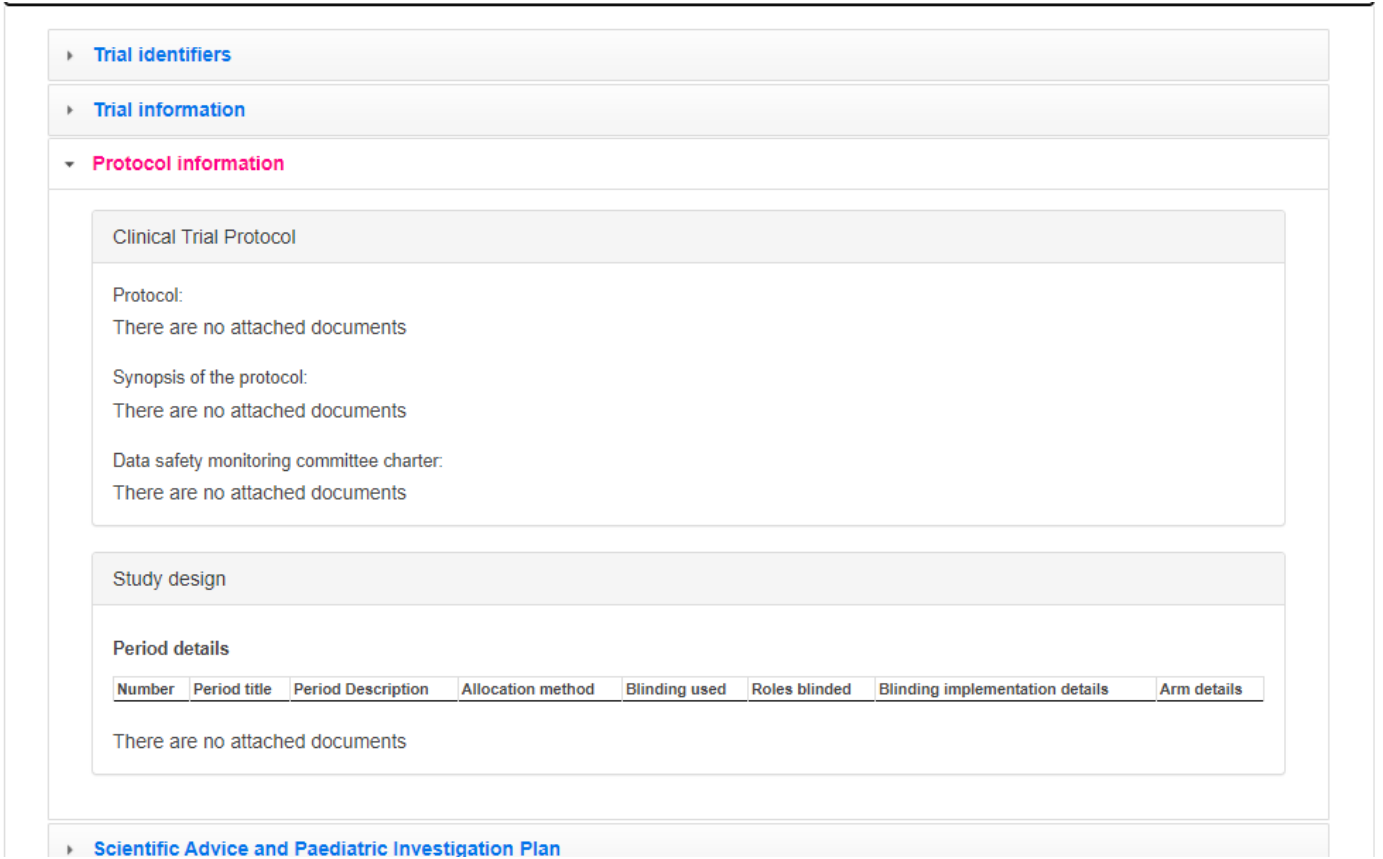


# View of public website in case of deferral



Trial identifiers

Trial information

Protocol information

Clinical Trial Protocol

Protocol:

There are no attached documents

Synopsis of the protocol:

There are no attached documents

Data safety monitoring committee charter:

There are no attached documents

Study design

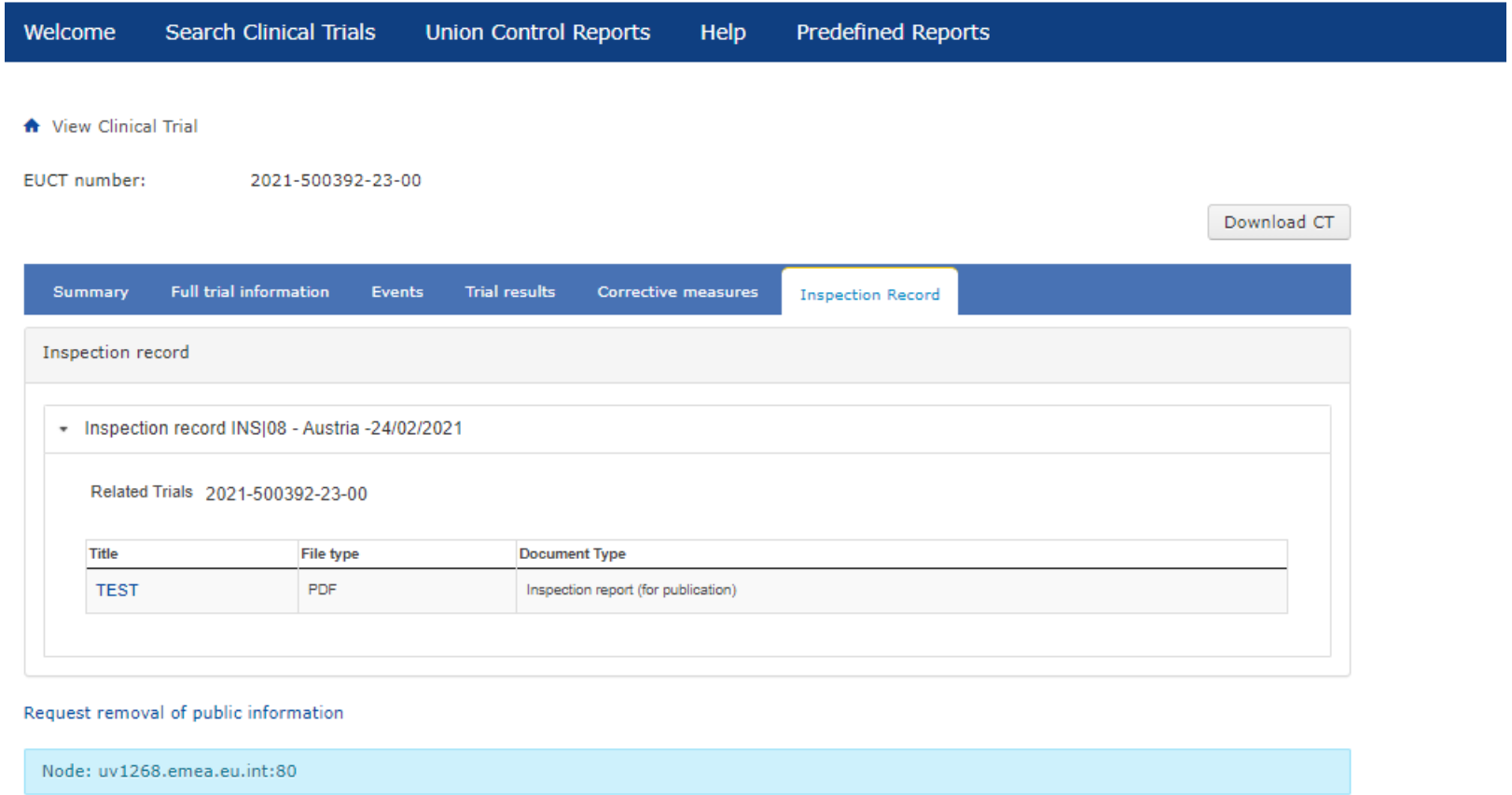
**Period details**

| Number | Period title | Period Description | Allocation method | Blinding used | Roles blinded | Blinding implementation details | Arm details |
|---|---|---|---|---|---|---|---|

There are no attached documents

Scientific Advice and Paediatric Investigation Plan

# Publication of inspection reports



# Conclusions

# Take home message

Transparency builds public trust and confidence in clinical trials, in the regulatory process and in trial results

- **Publication** of clinical trial data and information about medicines, their development and authorisation, helps to:
  - To generate trust – information is available
  - To build confidence – I understand what is happening
  - To empower – knowledge enables decision-making
  - Empowerment enables patients, consumers, their carers and treating physicians make good decisions for their healthcare

More information on Regulation (EU) No 536/2014 and CTIS can be found on:

https://www.ema.europa.eu/en/human-regulatory/research-development/clinical-trials/regulation

*Thank you for your attention*

# Any questions?

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