Quick guide

Transitional trials from EudraCT to CTIS (sponsor users)

CTIS Training Programme – Module 23
Version 1.3 – January 2023

Learning Objectives

- Remember what a Transitional trial is.
- Understand how to submit a Transitional trial.
- Understand how to submit notifications and clinical trial results for a Transitional trial.
- Understand the roles and permissions involved.

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# Record of updated versions

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| 1.3     | Minor changes applied:  
• Clarification on transition period and date when CTIS becomes mandatory | January 2023 |
| 1.2     | Minor changes applied:  
• European Commission reference link  
• Part I ‘Estimated Start of Recruitment’ information for transitional trials  
• Information about the EudraCT number for transition trials  
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Introduction

CTIS enables sponsors to fulfil their responsibilities for collecting, recording and submitting data for **Transitional trials** conducted in the EU/EEA. Since January 31st 2022, the Clinical Trials Regulation (EU) No 536/2014 repealed the Clinical Trials Directive 2001/20/EC; a **3-year transition period** is foreseen from the implementation of the Clinical Trials Regulation (CT Regulation). During that period and at any time, the sponsor can transition clinical trials that are authorised under the Clinical Trials Directive (CT Directive) and are ongoing. Its purpose is to enable sponsors to prepare the trials to be transitioned. The 3-year period is articulated according to the following schedule and rules:

- **In the first year** of application of the CT Regulation, sponsors are able to choose to submit new Initial Clinical Trial Applications (CTAs) under the regime of the CT Directive or the CT Regulation.

- **In the second and third years** following the application of the CT Regulation, all new Initial EU/EEA CTAs need to be submitted through CTIS. The latest date for submission of an Initial EU/EEA CTA under the CT Directive is 30 January 2023. From 31 January 2023, **clinical trial** sponsors need to use CTIS to apply to start a new **clinical trial** in the EU/EEA. However, trials authorised under the CT Directive regime can remain in EudraCT and continue to run under the requirements of the CT Directive until the end of the 3-year transition period (i.e. 30 January 2025), unless a new EU/EEA member state is added to the trial (this is considered a new trial application for this member state, and needs to be done through CTIS).

- **From the end of the third year** following the application of the CT Regulation, all trials that are still ongoing in at least one EU/EEA Member State will have to be transitioned to CTIS.

Sections of this quick guide

This quick guide is structured in four sections:

- **Overview of Transitional trials**
  Guide sponsor users on the management of Transitional trials and the process of creating and submitting a Transitional trial.

- **Create, submit and search Transitional trials**
  Steps to create, submit and search a Transitional trial.

- **Submit notifications and summary of results**
  Steps to create and submit notifications for Transitional trials and how to submit the summary of results.

- **Roles and permissions**
  Overview of the roles and permissions involved in the Transitional trial processes.
Transitional trials

Trials authorised under the CT Directive are to be transitioned to CTIS as Transitional trials. A 3-year transition period is foreseen from the implementation of the CT Regulation. The sponsor should submit to CTIS any still on-going trial by the end of the transition period. The transition can be enacted at any time during that period.

What to do before transitioning a trial

Sponsor organisations are advised to consider whether a trial needs to be transitioned. Sponsors must transition a trial from EudraCT to CTIS if at least one of the following conditions is fulfilled:

- the EudraCT trial is going to be conducted in additional EU/EEA member state(s), to which a EudraCT CTA was not submitted before 31 January 2023 (this is considered a new trial application for this member state)
- the EudraCT trial completion date is expected to be after 30 January 2025

In addition, only trials that meet the following criteria can be transitioned:

- Interventional clinical trials in humans.
- Involve at least one site in the EU/EEA where the trial is still ongoing.
- Not on hold, and no notification has been submitted regarding whether the trial has ended in the EU/EEA.

Trials that are foreseen to be completed by 30 January 2025, and that are not including additional EU/EEA Member States after 30 January 2023, remain in the EudraCT database, and do not need to be transitioned to CTIS. If an end of trial notification has been submitted in all EU/EEA member states, but the global end of the trial has not been notified, the trial does not need to be transitioned. Global end of the trial and trial summary results should be uploaded via EudraCT under the CT Directive. For more information on other cases where trials do not have to be transitioned, users can refer to the FAQs document of this module available on the EMA website.

Types of Clinical trial applications

The CT Regulation introduced a harmonised procedure for the submission of CTAs regarding trials to be conducted in the EU. Three types of applications are defined:

- **Initial CTA**: Request to conduct a Clinical trial (CT) that includes comprehensive information about the CT for the evaluation by the Member State Concerned (MSC).
- **Additional MSC**: Request by the sponsor for extending an authorised CT
Overview of Transitional trials

- **Substantial modification**: Request by the sponsor for a change of a CT that is likely to have a substantial impact on the subject's safety or rights or on the reliability/robustness of the generated data.

In order to transition a trial from EudraCT to CTIS, **an Initial CTA marked as a Transitional trial must be submitted**. For more information on how to manage other types of CTAs, users can refer to the eLearning material of Module 10 (Create, submit and withdraw a clinical trial).
How to create a Transitional trial

In order to transition a trial from EudraCT to CTIS, an Initial CTA marked as a Transitional trial must be submitted. In the CTIS 'Clinical trials' tab, users can create a Transitional trial by clicking the 'New trial' button at the bottom-right corner.

A pop-up window opens and users can populate all the required fields, such as the trial 'Full title' and the organisation details, where users can search for the sponsor organisation or create a new one. Once the required fields are populated, users must click on the 'Transitional trial' checkbox and then on the 'Create' button to create a draft Transitional trial. This enables a new field in the form section that allows users to link the EudraCT number data to the trial. If users do not select the checkbox, they need to cancel the CTA and create a new one. The EudraCT number cannot change after the Transitional trial is submitted.

Once the draft Transitional trial application has been created, users can start populating the required fields of the sections 'Form', 'MSCs', 'Part I' and 'Part II'. In order to populate a field, users can click on the 'Padlock' button in each sub-section, and fill in the details.
On the Form section of the CTA page, in the ‘Transition trial’ sub-section, sponsor users can include the relevant EudraCT number for that respective Transitional trial. This sub-section is only available when a user has marked the ‘Transitional trial’ checkbox when creating the CTA. To add the EudraCT number, users can click on the '+ Add EudraCT Trial' button, then search the respective trial via the search bar, select the EudraCT trial number, and then click on the 'Add EudraCT Trial' button. The EudraCT number cannot change after the Transitional trial is submitted.

On top of the EudraCT number, a checkbox indicating that the trial is Transitional is ticked by default. Users can untick it and the 'Confirmation' button to make the trial no longer treated as a Transition trial. This action cannot be undone and will make the 'Transitional trial' section no longer available within the 'Form' section, and all possible data uploaded within that section will be erased.

Users can populate the rest of the CTA sections and check that all information has been populated correctly by clicking on the 'Check' button. If everything is correct, it can be saved and then submitted. The system will highlight the sections where mandatory data or documents are missing. The draft Transitional trial cannot be submitted if any mandatory fields or documents are not filled in or uploaded.

For more information on how to submit trials, users can refer to the eLearning material of Module 10 (Create, submit and withdraw a clinical trial) available on the EMA website.
How to submit a Transitional trial

Once users fill in all mandatory fields and upload documents as applicable, users can submit the **Transitional trial** by clicking on the 'Submit' button and the 'Confirmation' button.

The trials that are transitioned to CTIS have already been authorised under the CT Directive. Member States Concerned (MSCs) may therefore choose to authorise the trials within or in less than 60 days. However, MSCs can create Requests for Information (RFIs) on the transitional application (leading to a maximum period of 106 days, or further in the case of some types of investigational medicinal products). Therefore, **sponsors are advised to submit their Transitional trials to CTIS early enough** before the end of the transition period. Once a trial has transitioned to CTIS, all the CT Regulation requirements will apply from the date of authorisation of the transition application under the CT Regulation.

Sponsors can access the 'Evaluation' section of a CTA page to access possible RFIs from MSCs about information that needs to be clarified in the context of the Transitional trial or other types of CTAs. For more information on how to respond to RFIs, users can refer to the [materials of Module 11 (Respond to requests for information received during the evaluation of a CTA)](https://ema.europa.eu/en/web/ctis) available on the EMA website.

After a decision has been issued upon by the MSCs, **all publication rules of the CTIS documents are applicable**, including the deferrals. Sponsors are advised to monitor whether the EudraCT trial status has been marked as 'Trial now transitioned', through checking the relevant EU Clinical Trial Register trial page and liaising with the relevant Member States where the trial was authorised under the CT Directive. For more information, users can refer to the [FAQs document of Module 10 (Create, submit and withdraw a clinical trial)](https://ema.europa.eu/en/web/ctis) available on the EMA website.
**Search Transitional trials**

There are two **advanced search functionalities** that allow users to search for **Transitional trials**. In the 'Clinical trials' tab users can open any of the searches, click on the 'Transition trial' criterion, insert the EudraCT number, and click on the 'Search' button. For more information on how to search for clinical trials and access them, users can refer to the [Quick guide of Module 9 (Search, view and download a clinical trial and a clinical trial application)](https://www.ema.europa.eu/en/quick-guide-module-9-search-view-download-clinical-trial) available on the EMA website.

Once users **access a Transitional trial**, in the summary sub-tab of a Transitional trial page, there is a label on the trial information outlining 'Yes' when it is a Transitional trial. If the trial is not a transitioned trial, the label shown is 'No'.

Users can check if the trial is transitioned by viewing the label on the summary page.
Submit notifications

Users can submit trial and recruitment period notifications through the 'Notifications' tab on a clinical trial page once the Transitional trial has been authorised by the MSCs. For Transitional trials, unlike non-Transitional Initial CTAs, the sponsor users may submit a 'Start trial' notification with a trial start date in the past and prior to the authorisation date documented in CTIS, as in fact the application was already previously authorised under the regime of CT Directive.

For more information on how to submit notifications; and the differences between trial submission date, authorisation date, trial start date, and notification submission date, users can refer to the eLearning material of Module 05 (Manage a clinical trial through CTIS) available on the EMA website.

Submit the summary of results

CTIS allows the user to submit the trial results after the authorisation of the Transitional trial in the 'Trial results' tab of a clinical trial page. The sponsor can submit the layperson summary within one year from the end of a clinical trial (in all EEA MSCs, if applicable), and within 6 months in case of paediatric trials or if the clinical trial is part of a paediatric investigation plan. For more information, refer to the Quick guide of Module 05 (Manage a clinical trial) available on the EMA website.

CT for training test

Summary of results

Lay person summary of results

Clinical study reports

Sponsors have the possibility of submitting an intermediate summary of results, prior to the summary of results if the CT protocol provides for an intermediate data analysis.
Roles and permissions

From the CTIS 'User administration' tab, users can manage the roles and permissions assigned. Users can search for users with already assigned roles by using the basic and advanced searches. Users can assign new roles by clicking the 'Assign new role' button on the right side of the page. For more information, users can refer to the materials of Module 07 (Management of registered users and role matrix) available on the EMA website.

In relation to the Transitional trials processes, only certain roles may view, update or submit one. The CT Admin and Application Submitter are the only two roles that can create and submit a Transitional trial.

Sponsors have the possibility to manage the roles and permissions for each Transitional trial.