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SCIENCE MEDICINES HEALTH

6. Update on ACT EU and CTIS

Industry Standing Group (ISG) meeting, 21 September 2023

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Data Analytics and Methods Task Force (TDA)

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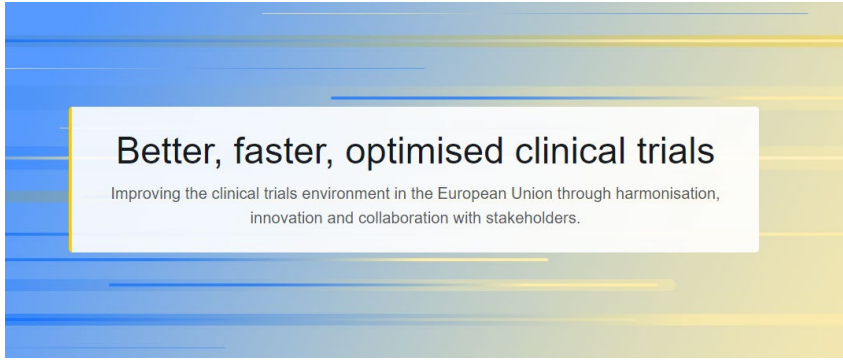
ACT EU

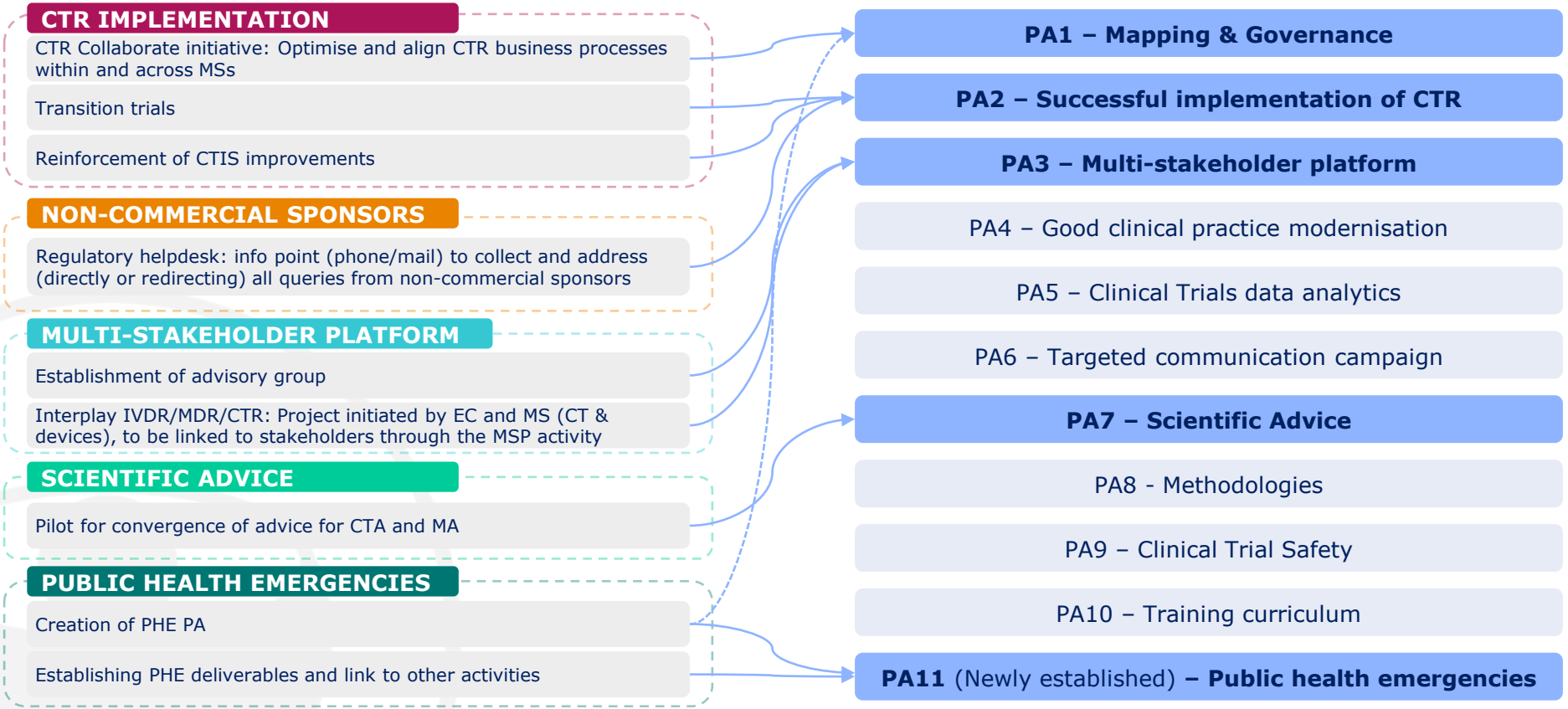
General updates

- ACT EU SG endorses priorities for 2023-2024
- Revised 2023-2024 workplan October 2023
- **CTR Collaborate initiative,** led by CTCG, to support optimised MS and NCA/ethics collaboration on clinical trial authorisation under CTR
- Creation of Priority action on **public health emergencies**
- Launch of **ACT EU website:** Homepage (europa.eu)
- **MSP kick-off meeting report** published: MSP workshop meeting report



Priorities and PAs

The priority areas defined have been linked to relevant PAs to make sure each priority is successfully implemented:



Priority action updates

Mapping & governance: **CTR Collaborate initiative** to support optimised MS and NCA/ethics collaboration on clinical trial authorisation under CTR anchored to PA1.

CTR implementation: KPI revamp (Sept); CTR Survey (deadline 4 October); Transition CTs: CTCG Best Practice Guide for sponsors of multinational clinical trials under CTD transitioned to CTR; CTIS Transparency rules (ISG 21 Sept; October MB)

Multistakeholder platform: creation of the MSP Advisory Group, call for nominations to stakeholder groups to be issued shortly.

GCP modernisation: ICH E6 (R3) commenting phase; ACT EU PA04 - Multi-stakeholder Workshop on ICH E6 R3 - Public Consultation

Priority action updates

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- **Data analytics** workshop scheduled for January 2024
- **Communications**: Launch of the ACT EU website 19 September 2023 https://accelerating-clinical-trials.europa.eu/
- **Scientific advice**: Consolidated scientific advice procedure under development
- **Methodologies:** Multi-stakeholder methodology workshop 23 November 2023
- **Safety monitoring**: Annual safety event (JA EU4Health Safe-CT) – 15-16 January 2024
- **CT training curriculum** – Developing training needs and gap analysis for regulators, academia, SMEs

CTIS SAFe Agile

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2 Network Product Owners

CTIS: 1 Network PO

- Estimated effort: 0.5 to 0.7 FTE

CTIS BI: 1 Network PO

- Estimated effort: 0.2 FTE

Role: develop business solution/product of shared interest with the network and responsible for maximising the value of the developed product/business solution

SMEs (Network)

CTIS: 6 Network SMEs

- Estimated effort: 0.3 FTE

CTIS BI: 2-4 Network SMEs

- Estimated effort: 0.1 FTE

Role: bring knowledge and expertise
Provide input upon request of Product Owner for specific business solution and responsible for supporting consistent enhancement
SMEs are not a permanent standing body, existing in their function for as long as the Product Owner requires their knowledge and expertise.

Product Teams

- small, self-organised product teams working with best available expertise to deliver the prioritised work
- directly involved in solution development, providing expertise on a specific business process or product
- Product Owners and SMEs inclusion is ensured at execution level of the Portfolio

CTIS Transparency rules

Transparency in the Clinical Trials Regulation

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Transparency is a pillar of the CT Regulation, also delivered through the searchable Clinical Trial Information System (CTIS) public website.

Article 81(4) of Regulation (EU) No. 536/2014

- EU database publicly accessible by default, with exceptions justified on any of the following grounds:
  - Protection of personal data;
  - Protection of commercially confidential information in particular taking into account the MA status of the medicinal product, unless there is an overriding public interest in disclosure;
  - Protecting confidential communication between MS in relation to the preparation of the assessment report;
  - Ensuring effective supervision of the conduct of a clinical trial by Member States.

Current CTIS transparency rules defined in the Appendix on disclosure rules

How transparency is **currently** implemented in CTIS

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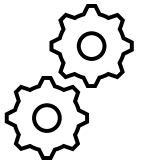
- Broad publication of the clinical trial application (CTA) dossier and information submitted in CTIS during the CT life cycle - i.e., notifications, summary of results

- Key aspects of the current disclosure rules:
  - *Deferral* mechanisms (up to 7-years after end of trial) to protect CCI considering applicable clinical trials categories OR
  - *Redaction* of commercially confidential information (CCI) in the document version 'for publication'



Note: Redaction of personal data is always applicable, regardless of the use of deferrals

Drivers for change

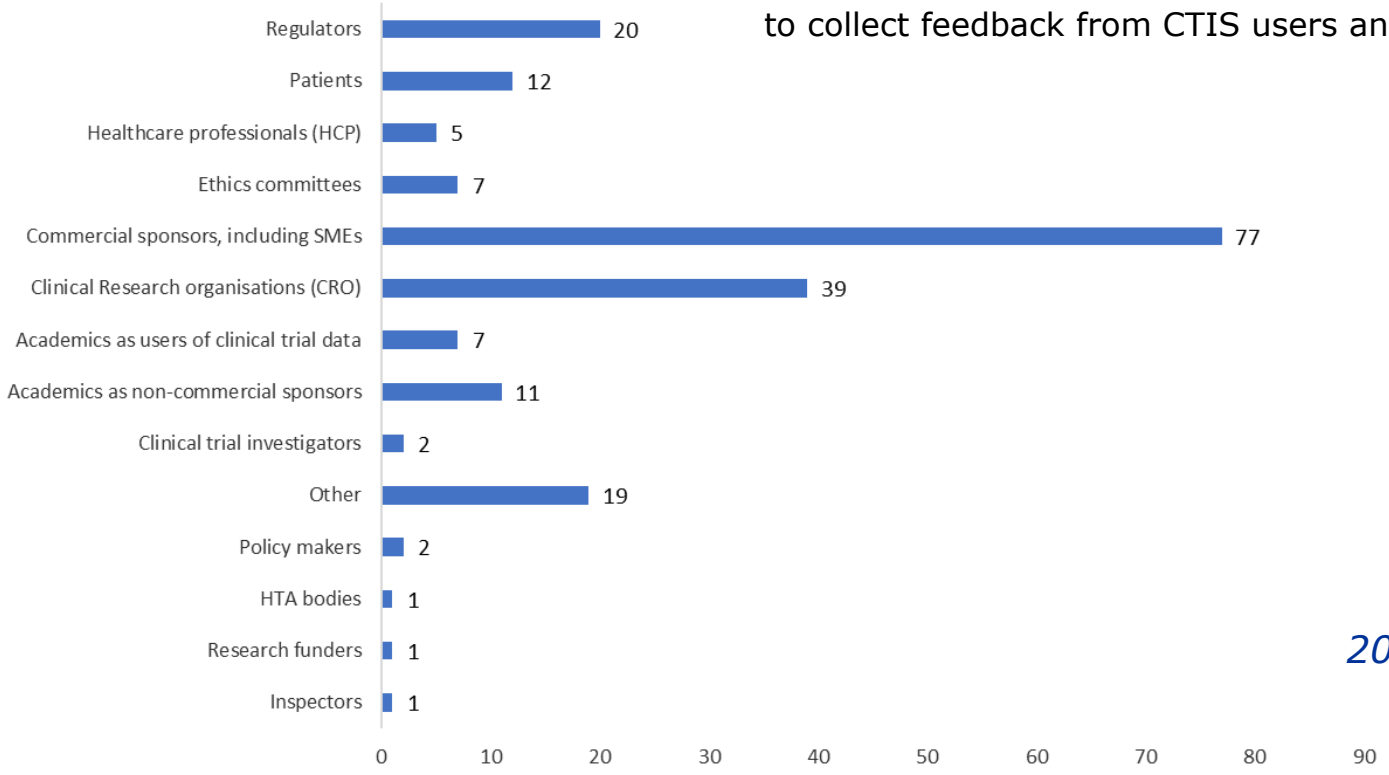
- Transparency requirements among the main obstacles of CTR implementation for sponsors based on feedback from a targeted survey to sponsors in 2022
- Complexity of current rules might lead to technical / human error
- Concerns about the timing for the publication of key clinical trials document, namely protocols (deferrals up to 7-years from end of trial)

Public consultation on CTIS Transparency rules from 3 May to 28 June 2023 to gather feedback from CTIS stakeholder community

Results of the public consultation

Responses grouped by affiliation

Public consultation launched – 3 May to 28 June 2023 - to collect feedback from CTIS users and stakeholders



204 valid responses

Results of public consultation

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- Results show that stakeholders have different views and needs, with industry focusing on CCI protection and civil society asking the immediate publication of key clinical trial documents
- **Consensus on the need for simplification**
- Deferrals should be maintained in CTIS if the number of documents to be published is high, as otherwise redaction would be too burdensome
- Medical writing plays an important role on the document content - reducing the amount of personal data and CCI that are included will help to limit the need for redaction

EMA reviewed received feedback to propose a revision of CTIS transparency rules

Objective of revision of CTIS transparency rules

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Ensuring **timely transparency that delivers for stakeholders**, through:

- Earlier publication of key clinical trials information (i.e., structured data and documents)
- Ensure publication of information most relevant for the public, focusing on needs of patients and clinical researchers in EU/EEA
- Simplification of the system: removal of the deferral mechanism in CTIS ensuring timely publication of key data and documents
- A balanced approach between transparency of information and protection of commercially confidential information

The aim is a *less complex*, *more efficient* and *user-friendly* system, maintaining early public access to key clinical trials information, in line with the aims of the CTR

Highlights of proposed new publication rules

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- Publication of structured data fields in the CTA largely unchanged, except for dose and strength details for some trials, which will no longer be published
- Publication focused on a **reduced** number of key (redacted) documents of interest
- Deferral functionality removed, allowing publication of fewer (redacted) documents at the time of decision on a clinical trial application (CTA)
- Redaction as the main tool to protect CCI and personal data, if included in the documents
- Summary of results published with a layperson summary when submitted in CTIS, except for category 1 trials in adults > publication occurs 30 months after end of trial in EU/EEA

Notes:

- Specificities for publication of structured data fields and documents for early development phase trials remain in place
- Interplay with Policy 0070 on publication of clinical study reports remain in place

Proposal for new transparency rules

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- **Category 2 and 3 trials (vast majority of all trials)** - Publication of documents at the time of the Member State decision* limited to:
  - ❑ Protocol, including synopsis and patients facing documents
  - ❑ Informed consent form and patient information sheet
  - ❑ Summary of medicinal product characteristics (SMPC)
  - ❑ Recruitment arrangements, advertising material

  The first MSC issuing the decision triggers the publication in CTIS public domain

  Final summary of results and layperson summary published when submitted in CTIS
- **Category 1 trials**: publication of protocol and summary of results simultaneously: 6 months after end of trial (for paediatric trials) and 30 months after the end of trial (for adult population)
- **For all trials**: clinical study reports published when submitted in CTIS

*Authorised, authorised with conditions, not authorised

Revision of CTIS transparency rules

- Guidance has been provided to CTIS users on CCI protection (chapter 4)
- Questions and answers document also elaborates on MSs Authorities view on CCI protection
- CCI protection is time dependent and redaction of CCI expected to decrease overtime
- Listening to stakeholders' feedback, under the new rules certain data/documents will no longer be published, including:
  - RFI and RFI responses
  - Investigator Brochure (IB) in part I of the CTA dossier
  - MSs final assessment reports part I and part II, decision letters, GCP inspection reports
  - Any documents attached to RFI, RFI responses, notifications
  - Dose and strength details for certain types of trials
- A balanced approach on transparency on the publication of key clinical trial information in a timely manner allowing also sponsor to protect their legitimate economic interest and promote clinical research in the EU

Benefits for stakeholders

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Sponsors

- Less documents requiring redaction of CCI and personal data → Reduced complexity and faster preparation of CTA dossier
- Removal of the deferral mechanism delivers significant process simplification and reduces the risk of inadvertent publication of CCI
- Simpler and earlier publication increases patients' engagement and trust

Patients/ HCP

- By removing deferral functionality patients can access key data and documents as early as possible in the clinical trial lifecycle, before the start of the trial
- Focus on publication of key clinical trial information (incl. protocols) → patients able to easily identify published information of interest by reduced complexity
- Earlier access to information for patients will facilitate the start of trial and enrolment
- Increased awareness on possible treatment options

Next steps

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01

Revised rules for endorsement by EMA MB

5 Oct 2023

02

New specifications and implementing changes to CTIS public portal

Q4 2023 – Q2 2024

03

Launch of revamped CTIS public portal & application of new transparency rules

Q2 2024

Any questions?

Further information

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