PhRMA

New Medicines. New Hope.

Implementation of Clinical Trial Transparency

Issues to Consider

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Agenda

- **Background**
- **PhRMA Clinical Trial Principles**
- **Implementation of ClinicalTrials.gov**

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Background

Clinical Trial Transparency

- **Enormous strides in clinical trial transparency in the past 15 years**

  - 1997 → FDAMA clinical trial registry (www.ClinicalTrials.gov)
  - 2002 → PhRMA results portal
  - 2007 → FDAAA
    - -- Expanded registry
    - -- Framework for expanded results reporting
  - 2009 →
    - -- Further expansion
    - -- Revision of PhRMA Clinical Trial Principles

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PhRMA Clinical Trial Principles

PhRMA Industry Guidelines

- **PhRMA Code on Interactions with Healthcare Professionals (“PhRMA Code”) (2008)**
- **Guiding Principles on DTC Advertising (2008)**
- **Principles on Conduct of Clinical Trials and Communication of Clinical Trial Results (“PhRMA Clinical Trial Principles) (2009)**

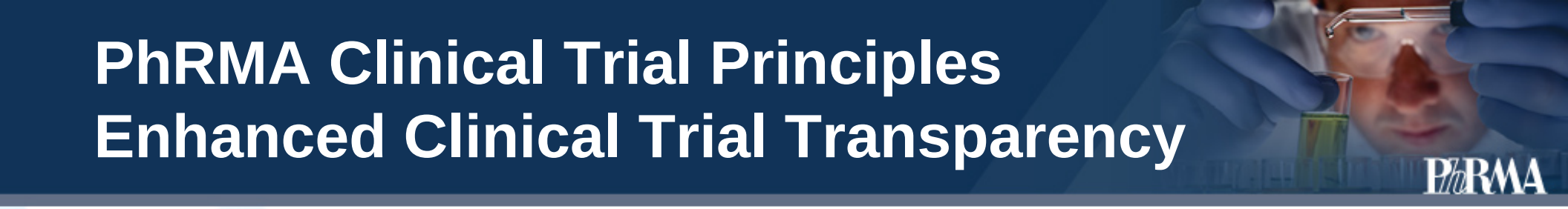
PhRMA Clinical Trial Principles Overview

- **Commitment to Protecting Research Participants**
- **Conduct of Clinical Trials**
  - Test scientific hypotheses and gather bona fide data
  - Selection of investigators – based on training and qualifications
  - Informed consent
  - Safety monitoring
- **Ensuring Objectivity in Research**
  - Independent review and safety monitoring
  - Potential conflicts of interest
- **Providing Information About Clinical Trials**
  - Registry and communication of results
  - Medical journal authorship standards

PhRMA Clinical Trial Principles Overview of Revisions in 2009

- **Significant revisions to the PhRMA Clinical Trial Principles in following areas:**
  - Communication about clinical trials
    - Enhanced transparency for patients and healthcare professionals
  - Publication policies
    - Enhanced authorship standards – alignment with International Committee of Medical Journal Editors (ICMJE)
  - Conflicts of interest
    - Improved alignment with PhRMA Code and ICMJE standards

PhRMA Clinical Trial Principles
Enhanced Clinical Trial Transparency



- **<u>Register all clinical trials involving patients</u>** (*e.g.*, not healthy adults) so that they may enroll, including Phase 1 studies
- **<u>Provide summary results</u>** of clinical trials involving patients for
  - *Approved products*
    - 12 months after the trial ends or within 30 days after approval of the drug (FDAAA standard)
  - *Discontinued research program*
    - Within one year of program discontinuation
    - When the company is no longer studying the applicable molecule, does not expect to resume development, and has no plans for the molecule on its own or through collaboration or out-licensing

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Implementation of ClinicalTrials.gov

Implementation of ClinicalTrials.gov Round One: 2007 - 2008

- **FDAAA Expanded registry – 12/26/07**
  - List of new elements in 42 USC § 282(j)(2)
  - Applicable to:
    - "[C]ontrolled clinical investigation [21 CFR 312.3], other than a phase I clinical investigation"
      - "[A]ny use of a drug except for the use of a marketed drug in the course of medical practice.
    - 21 days after trials initiated after 9/27/07 — **Serious or life threatening disease**
    - Ongoing trials after 12/26/07 — **Serious or life threatening disease**
    - Ongoing trials after 9/27/08 — **Not serious or life threatening disease**

Relatively quick implementation deadline in 2007 required new policies, training, and implementation globally

Implementation of ClinicalTrials.gov Round Two: 2008 - 2009

- **For approved products only**
- **Basic results database – 9/27/08**
  - Tables of patient demographic and baseline data
  - Tables of primary and secondary outcome
  - Point of contact
  - Whether there is agreement re: principal investigator publishing or discussing results
- **Adverse event information – 9/27/09**

Implementation of ClinicalTrials.gov Round Three: 2009 - ?

- **Public meeting – 4/20/09**
- **Expanded results by rule – statutory deadline was 10/27/2010**
- **Major issues outstanding**
  - Results for unapproved drugs?
  - Summaries (rather than tabular)?
  - Lay summaries?
  - Standard format of submission of results
  - Appropriate timing and requirements for updates

Implementation of ClinicalTrials.gov
Ongoing Issues

- **Lack of formal guidance process (Good Guidance Practice)**
  - **Limited informal guidance on CT.gov promulgated without comment period**
- **Lack of harmonization with EMA system**
  - **Additional regulatory burden**
- **Lack of flexibility for voluntary postings hinders use for additional transparency**
- **Government commitment to protecting confidential commercial information and trade secrets**
  - **Maintaining incentives to invest in clinical research**