EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Revised CTIS transparency rules, historical trials and interim period: quick guide for users

V. 1.3, including details on go live date, on applications' view and on historical trials publication

CTIS team, Data Analytics and Methods Taskforce (TDA)

An agency of the European Union

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Implementation of revised rules

Implementation of the Revised CTIS transparency rules

The Revised CTIS transparency rules are expected to become applicable on **18 June 2024**, with the launch of a revised version of the CTIS public portal.

Once the revised version of the CTIS public portal is live:

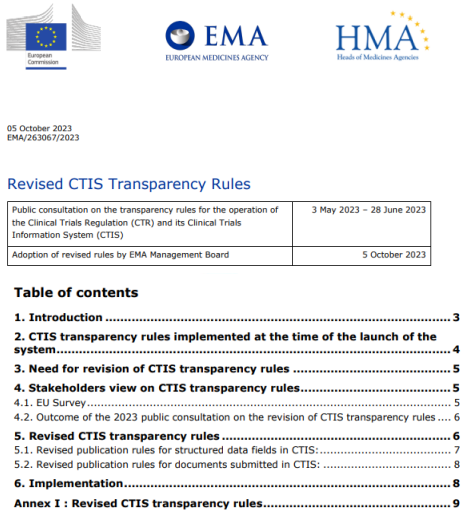
- All trials submitted on or after 18 June will follow the principles and timelines defined in the revised rules
- Trials applications submitted to CTIS before this date will be considered 'historical' and have only their structured data published: see 'historical trials' section

Until the revised version of the CTIS public portal is launched, the Appendix on disclosure rules will still stay applicable, however sponsors can already follow the principles of the revised transparency rules: see 'interim period' section

Implementation of the Revised CTIS transparency rules

The Revised CTIS transparency rules foresee the following main changes, compared to the current disclosure rules:

- publication focused on key documents of interest
- removal of deferral functionality – documents are published earlier in time
- use of redaction as the method to protect CCI and PD, if included in those key documents



European Commission · EMA EUROPEAN MEDICINES AGENCY · HMA Heads of Medicines Agencies

05 October 2023
EMA/263067/2023

Revised CTIS Transparency Rules

Public consultation on the transparency rules for the operation of the Clinical Trials Regulation (CTR) and its Clinical Trials Information System (CTIS)	3 May 2023 – 28 June 2023
Adoption of revised rules by EMA Management Board	5 October 2023

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Article 81(4) of Regulation (EU) No. 536/2014: legal basis for the establishment a publicly accessible EU clinical trials database, while protecting commercially confidential information (CCI), personal data (PD) and confidential information on the assessment conducted by MSs

Revised rules: modality of disclosure of CTIS trials' information

Revised rules: modality of disclosure of CTIS trials' information

The **most recent** authorised application of any trial, as well as any 'not authorised' initial application, is made publicly available as per timelines based on:

- trial category, selected in the 'Form' section as per below table
- population age
- trial phase *(in case of category 2 trials that are integrated phase 1&2)*

Category	Trial type
Category 1 Pharmaceutical development clinical trials	Phase I clinical trials in healthy volunteers or patients Phase 0 trial in healthy volunteers or patients Bioequivalence and bioavailability trials Similarity trials for biosimilars Equivalence trials for combination or topical products
Category 2 Therapeutic exploratory & confirmatory clinical trials	Phase I and phase II integrated clinical trials Phase II clinical trials Phase II and phase III integrated clinical trials Phase III clinical trials
Category 3 Therapeutic use clinical trials	Phase III and phase IV integrated clinical trials Phase IV clinical trial and low interventional trials

Publication of structured data

As per Revised CTIS transparency rules, applicable to all applications submitted as of 18 June 2024

Structured data – what will be published & when

<table>
<tr><th rowspan="2">Structured data</th><th colspan="2">Category 1</th><th rowspan="2">Category 2 integrated ph1&2</th><th rowspan="2">Category 2 & 3
(excl. integr. ph1&2)</th></tr>
<tr><th>Paediatrics and/or PIP</th><th>Adults</th></tr>
<tr><td rowspan="2">CTA fields*</td><td rowspan="2">First MSC decision</td><td>First MSC decision</td><td rowspan="2">First MSC decision</td><td rowspan="3">First MSC decision</td></tr>
<tr><td>30 months after EU/EEA End of Trial</td></tr>
<tr><td>Product/AS details on strength, dose and treatment duration*</td><td colspan="3">30 months after EU/EEA End of Trial</td></tr>
<tr><td>MSC(s) conclusions and decision outcomes</td><td colspan="4">That MSC decision</td></tr>
<tr><td>Notifications on trial status and recruitment</td><td colspan="4">As soon as submitted by sponsor</td></tr>
<tr><td>Notifications on serious breaches, urgent safety measures, unexpected events</td><td>After MSC assessment</td><td>30 months after EU/EEA End of Trial & MSC assessment</td><td colspan="2">After MSC assessment</td></tr>
<tr><td>Corrective measures (suspension, revocation, modification request)</td><td colspan="3">When applied by MSC(s)</td><td>*see following slide</td></tr>
</table>

Structured data – what will be published & when

Structured data	Category 1		Category 2 integrated ph1&2
	Paediatrics and/or PIP	Adults	
CTA fields populated by the sponsor, including: - Public title (= title in lay terms) - Trial identifiers in registers, protocol code - Phase, medical cond., rare disease, therap. area - Population age, gender - Sponsor details - Details of clinical investigator sites in MSC(s)	First MSC decision	First MSC decision	First MSC decision
Remaining CTA fields populated by the sponsor		30 months after EU/EEA End of Trial	
Product/AS details: Strength of product & active substance, Maximum duration of treatment, Maximum daily dose allowed, Daily dose unit of measure, Maximum total dose allowed, Total dose unit of measure	30 months after EU/EEA End of Trial		

Structured data – what will be published & when

Structured data	All categories
Sponsor legal representative details	Never
Any request for information (RFI) and RFI responses	
Validation conclusion details, assessment decision conditions (if any)	
MSC(s) assessment(s) on notifications	
3rd country inspection details	

Publication of documents

As per Revised CTIS transparency rules, applicable to all applications submitted as of 18 June 2024.

Details on how the workspace view will change are specified.

Documents – what will be published & when

<table>
<tr><th colspan="3">Category 1</th><th rowspan="2">Category 2 and 3
including integrated ph1&2</th></tr>
<tr><th>Documents type</th><th>Paediatrics and/or PIP</th><th>Adults</th></tr>
<tr><td>Protocol, synopsis, patients facing documents</td><td>Upon results' submission</td><td>30 months after EU/EEA End of Trial</td><td rowspan="2">First MSC decision</td></tr>
<tr><td>SmPC, if available</td><td colspan="2" rowspan="3">Never</td></tr>
<tr><td>Subject information and informed consent form</td><td rowspan="2">That MSC decision</td></tr>
<tr><td>Recruitment arrangements, including procedures for inclusion and copy of advertising material</td></tr>
<tr><td>Final summary of results, Lay person summary of results</td><td>As soon as submitted</td><td>30 months after EU/EEA End of Trial</td><td>As soon as submitted</td></tr>
<tr><td>Clinical study report, if available</td><td colspan="3">As soon as submitted</td></tr>
<tr><td>All other documents, including any MS document</td><td colspan="3">Never</td></tr>
</table>

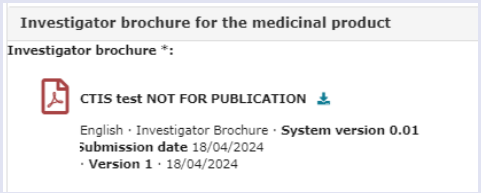
Workspace view of any application created before go live date

For all those documents that are no longer published under the revised rules(e.g. Investigator's Brochure), **only the following version** will be kept in the workspaces, as of 18 June 2024:

- version 'not for publication' (in case the version 'for publication' is present, it will disappear)
- version 'for publication', in case no version 'not for publication' is present in the system

workspace view

before 18/6/24



as of 18/6/24

The above is applicable to all applications created before 18 June 2024. In addition, for applications created **and** submitted before 18 June 2024: see 'historical trials' section

Historical trials, submitted before the launch of the new public website

Section 4 of ACT EU Q&A on the protection of Commercially Confidential Information and Personal Data while using CTIS

Historical trials: what is published and when

For all those CTIS applications **submitted*** before 18 June 2024 *(expected launch of new CTIS public portal):*

- the structured data will be published for all trials' categories as per revised rules
- **documents will not be published** *(this applies to all historical trials, regardless of the previous use of deferrals or publication status)*

The following kinds of CTIS applications **submitted*** on or after 18 June 2024 will trigger publication of those documents that are in scope of the application and of the revised rules:

- Substantial Modifications (part I and/or part II)
- Non-Substantial Modification part II
- Additional Member State (triggering publication of part II docs only)

→ ***documents** in scope of publication **should be redacted accordingly***

**the date determining whether a trial is 'historical' or not, is the submission date, not the date of creation of your draft*

Historical trials: what is published and when

NSM and AM applications will not trigger the publication of part I documents: this is because through these two kinds of applications, it is not possible for sponsors to update and therefore redact those documents in scope of publication

→ for an application that is submitted to CTIS on and after 18 June, *the* ***documents*** *in scope of publication that are feasible to be modified through the application are going to be published and* ***should be redacted accordingly***

Example, for an initial application submitted before 18 June 2024:

- the latest version of its structured data is published at the date of go live of new CTIS public website
- documents of initial application are not published

If an SM-1 is submitted after go live of new CTIS public website with the purpose of updating the IB: protocol and synopsis will be published as per revised rules

An NSM-1 submitted after go live will only trigger an update of the structured data and not of any document

Interim period: until the new CTIS public website is launched

Section 4 of ACT EU Q&A on the protection of Commercially Confidential Information and Personal Data while using CTIS

Interim period: until the new CTIS public website is launched

For initial applications:

- sponsors may provide the version 'for publication' only for those documents in scope of the revised rules, and for those documents that will no longer be subject to publication, upload in the slot 'for publication' a page with wording suggested in Annex I*
- the above should translate in refraining from requesting deferral, as CCI are protected by redaction in the documents in scope of publication

For modifications/additional MS applications: sponsors should consider the preferred approach on protection of personal data and CCI, with the aim to decrease burden depending on the status of the trial, i.e. whether deferrals are already in place

For transitioning applications: sponsors should follow the principles of Q 11 of the Guidance for the Transition of clinical trials from the CTD to the CTR and submit a redacted version 'for publication' only of protocol, subject information sheet and ICF

*Annex 1 of the ACT EU Q&A on the protection of Commercially Confidential Information and Personal Data while using CTIS

Revised CTIS Transparency rules: useful material

ACT EU – Implementation of clinical trial regulation website

Revised CTIS Transparency rules: useful material

The ACT EU – Implementation of clinical trial regulation website has a section dedicated to the revised transparency rules, to allow sponsors to familiarise with them during the interim period until the revised version of the public portal is launched:

- Quick guide for users
- ACT EU Q&A on the protection of Commercially Confidential Information and Personal Data while using CTIS
- CTIS Bitesize talk on the transparency rules

Details are provided on data and documents that will be published, on the interim period and on all those trials submitted before the launch (‘historical trials’).