

Introduction to changes to the TGA's Clinical Trial Notification (CTN) process

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Introduction overview

- Background
- Benefits
- What preparation is required by clinical trial sponsors?



Background

- The current CTN process is paper based and quite burdensome administratively
- Responding to sponsors request for an electronic lodgement system – improved efficiency
- Errors in data reporting

<u>Inaccuracies in clinical trial statistics for the reporting period</u> 2009-2012



- Improved external and internal tracking of documents (no lost signed originals)
- Reduction in need to follow up information that may not be legible (typed over hand written)
- Sponsor instantly knows that the CTN has been received by the TGA (no need to contact the TGA to confirm receipt)



- The status of the CTN is known to the sponsor e.g. under review
- Variations to the original application are streamlined by using the original data set
- Reports will be more detailed and with a higher degree of accuracy

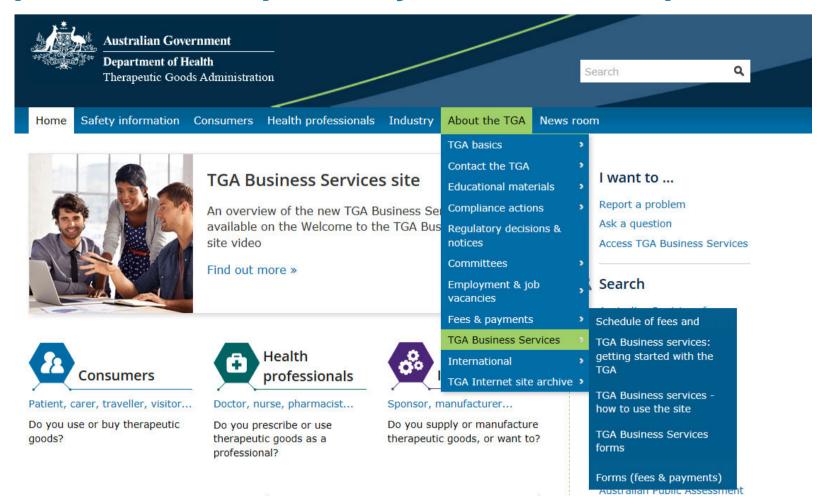


- All clinical trial documentation relevant to the CTN will be accessible on TGA Business Services (TBS)
- There will be no need for Sponsor, Principal Investigator (PI), Human Research Ethics Committee (HREC) or Approving Authority (AA) certification on the form
- A guide on how to complete the CTN form will be available on TBS and the form will contain tool tips



- More accurate, timely and detailed reports, if organisations request information from the TGA
- Clinical trial activities and trends can be identified could improve Australia as a better choice for the conduct of clinical trials
- TGA time currently spent on administrative activities can be value added to review of CTN submissions space
- Closing the loop much easier for sponsors to inform the TGA when a clinical trial is complete





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TGA Business Services

28 April 2015

TGA Business Services establishes a base for electronic commerce, electronic lodgement of data packages in support of applications for entry of products onto the Australian Register of Therapeutic Goods and enables online client access to legally appropriate information. The <u>Terms and Conditions</u> for using TGA Business Services are available.

TGA

Open TGA Business Services

Business

Services Go to the TGA Business Services website.



TGA Business services: getting started with the TGA

Introduction to TGA online services for sponsors, agents and manufacturers.



TGA Business Services: how to use the site

The TGA Business Services site allows industry to manage some therapeutic good registration applications, and view and cancel their current entries on the Australian Register of Therapeutic Goods (ARTG).



TGA Business Services forms

Top of page



- Apply for your client identification number about 3 working days
- Apply for access to TBS about 3 working days
- Once the TBS Helpdesk receives your completed
 Organisation details form, a Administrator Account is created
 for the nominated person this enables that person to control
 who has access to the information



- Administrator for the organisation will be able to set up different user accounts e.g. Drafter, Submitter, Finance
- The users of your account can then access your secure TBS portal to:
 - -submit CTN forms
 - -pay invoices online



- TGA webpage TGA Business Services how to use the site
 - ✓ Video
 - √ Frequently asked questions
- TBS Helpdesk available to answer further enquiries
 - ✓ Email: ebs@tga.gov.au
 - phone: 1800 010 624



CTN/ Clinical Trial Exemption (CTX) online submission - overview

- Unapproved therapeutic goods
- Clinical trials
- Online submission form for CTN/CTX

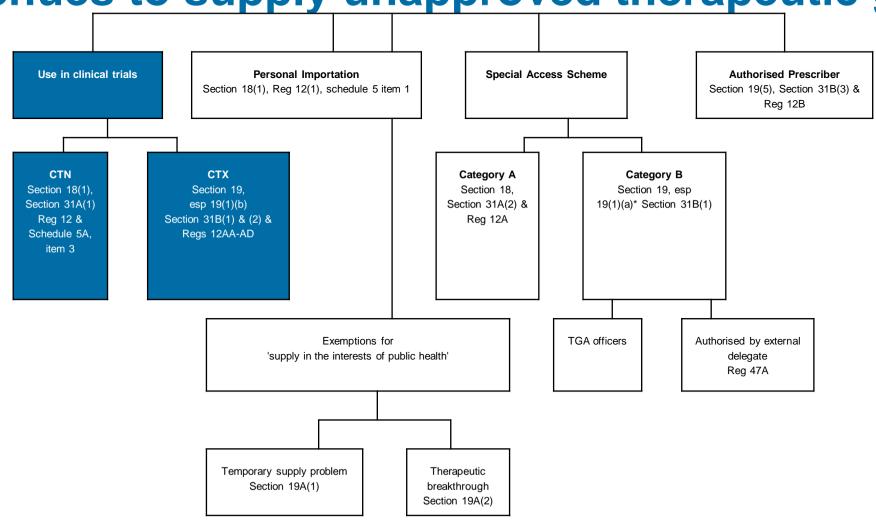


What is an unapproved therapeutic good?

- Generally, therapeutic goods must be entered in the Australian Register of Therapeutic Goods (ARTG) to be lawfully supplied in or exported from Australia
- Goods that do not appear on the ARTG, or ARTG goods being used outside of marketing approval are considered unapproved goods
- Unapproved goods have not been evaluated by the TGA for quality, safety or efficacy



Avenues to supply unapproved therapeutic goods





TGA's role in clinical trials differs from some other regulators

 Main focus is on access to unapproved medicines and devices for trials rather than end-to-end regulation of trials

 CTX/CTN schemes required for any product not entered on the ARTG or use of a product in a clinical trial beyond the conditions of its marketing approval



CTN vs CTX Schemes - overview

CTN

- Notification process
- One step process
- Medicines, devices or biologicals
- No TGA review of data prior to trial
- Trial cannot commence without valid notification and fee paid
- Assurances pertaining to the trial conduct and protocol are provided by the sponsor, HREC, PI and AA
- Each additional trial site notified before commencing trial at that site

CTX

- Approval process
- Two step process part 1 (approval) part 2 (notification)
- Medicines, devices or biologicals but required for certain class 4 biologicals
- TGA evaluates the proposed Usage Guidelines
- Trial cannot commence without Part 1 being approved
- Assurances pertaining to the trial conduct and protocol are provided by the sponsor, HREC, PI and AA
- May conduct **any number of clinical trials**, provided use of the product falls within the original approved Usage Guidelines
- Each trial must be notified to the TGA



Legal responsibilities

 All trials must have an Australian sponsor who initiates, organises and supports a clinical study and carries the medico-legal responsibility



Guidelines for Clinical Trials

- Conduct of the proposed trial should be in accordance with:
 - National Health Medical Research Council (NHMRC)
 National Statement on Ethical Conduct in Research
 Involving Humans (2007)
 - Declaration of Helsinki
 - Note for Guidance on GCP or the ISO 14155 Clinical Investigation of Medical Devices
 - -relevant Commonwealth and/or State/Territory laws



Guidelines for manufacturing

- Generally, a facility manufacturing therapeutic goods, including Investigational Medicinal Products (IMP) and placebo, for supply in Australia must comply with appropriate GMP standards and must be licensed accordingly
- The TGA has adopted the *PIC/S Guide for Good Manufacturing Practice for Medicinal Products 2009*, with Annex 13 of this guide referring to the manufacture of IMP



Clinical trial statistics

2014 total new trials – 967 Total notifications (number of sites) – 3762

New trial notifications that include a therapeutic good received by phase

	2012	2013		2014	
	Jul-Dec	Jan-Jun	Jul-Dec	Jan-Jun	Jul-Dec
Phase 1	85	65	132	68	83
Phase 2	128	86	102	130	124
Phase 3	155	131	70	153	198
Phase 4	34	28	32	32	34
Bioavailability/equivalence	5	4	5	2	3
None specified	9	12	14	64*	76*
Total	416	326	355	449*	518*

^{*}this number now combines those CTNs which involve device(s)

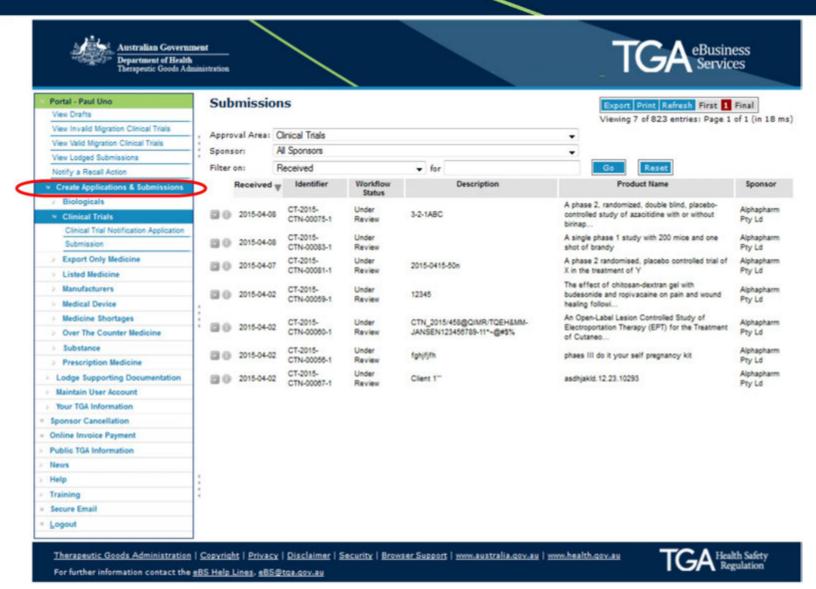


Online submission of CTN / CTX

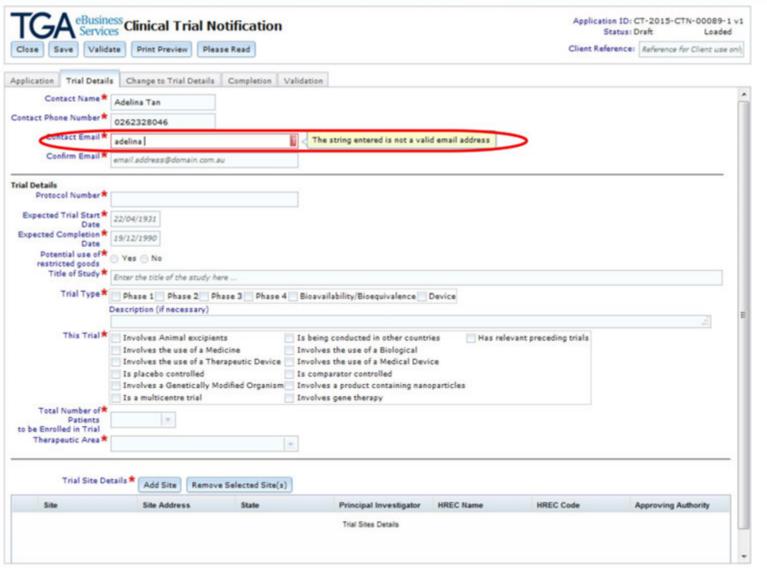
- Currently paper driven, manually entered into a database
- New form completed and submitted online



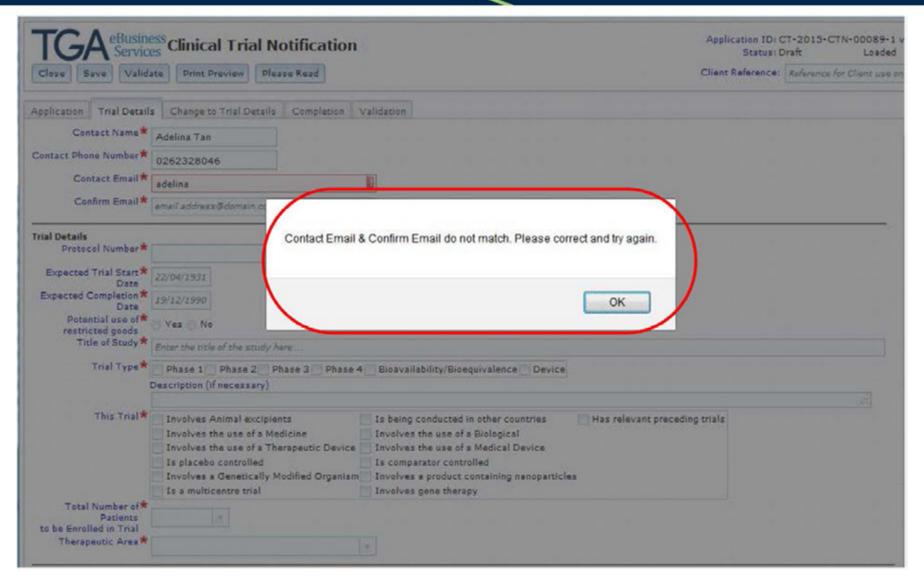




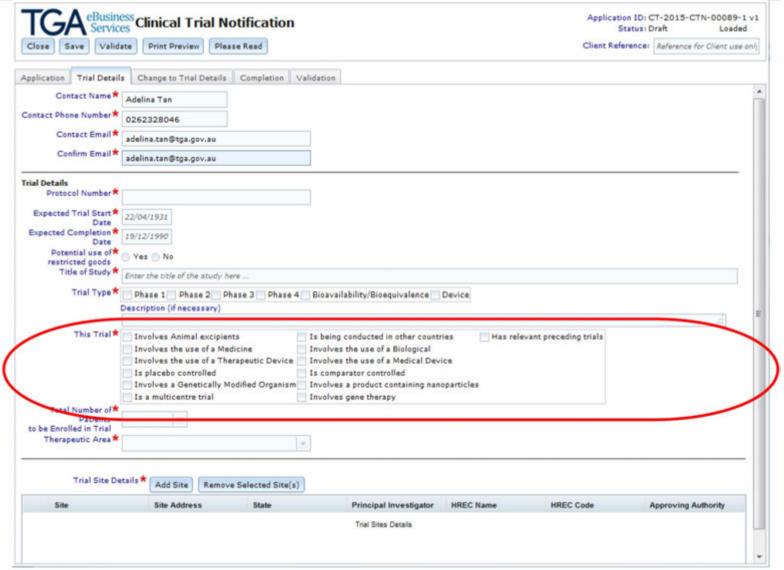




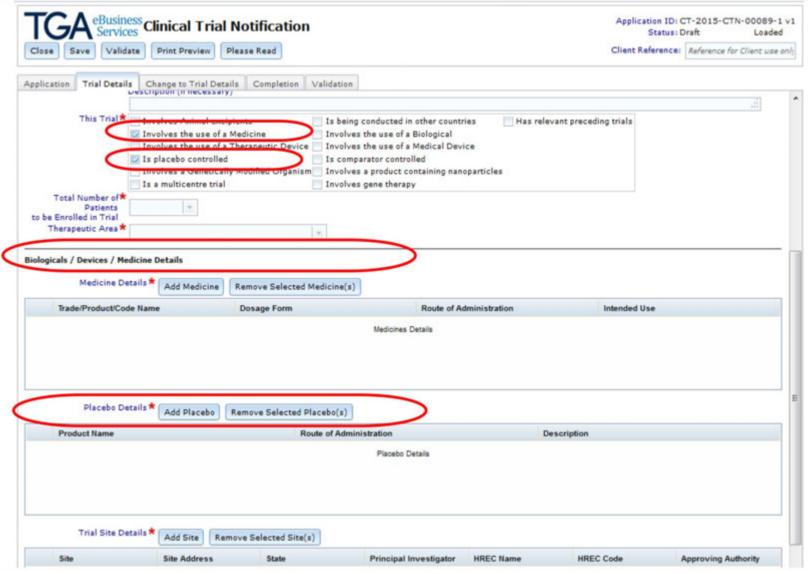




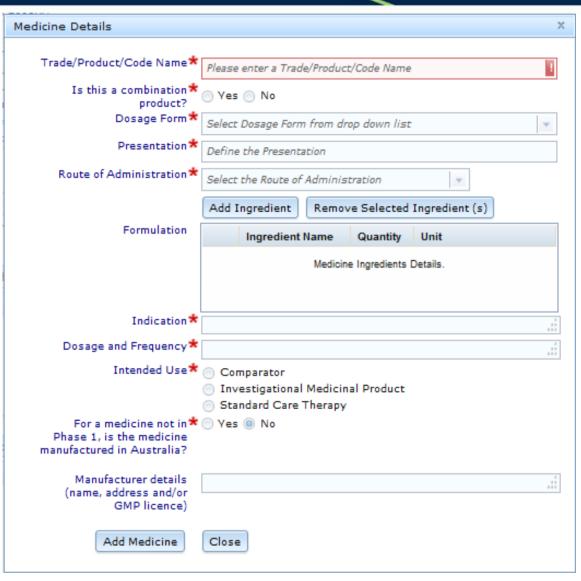




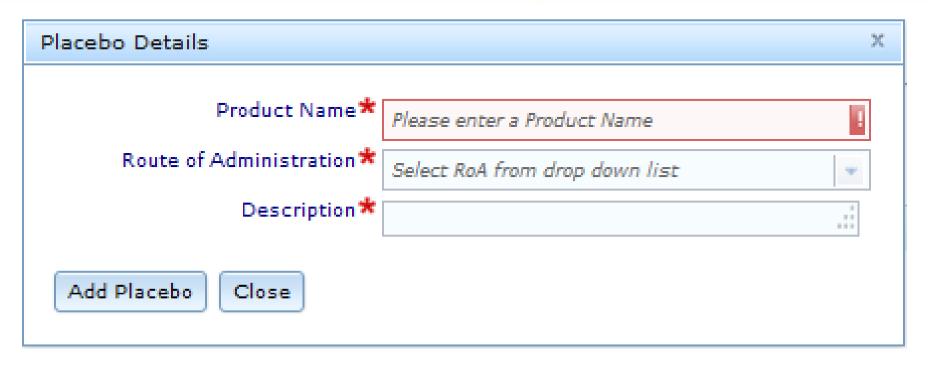








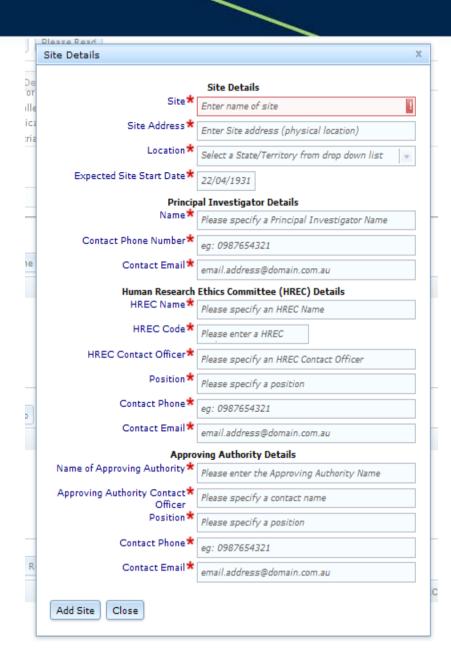




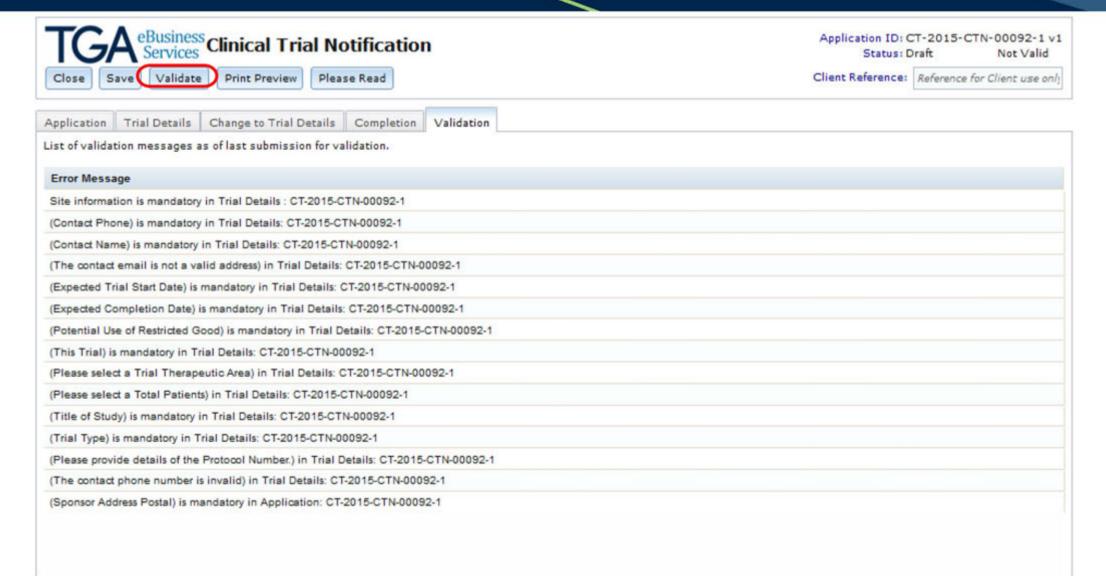
Why placebos should be entered on the CTN Under the *Therapeutic Goods Act 1989*, therapeutic goods means goods:

- (a) that are **represented in any way** to be...
- (i) for therapeutic use; or...

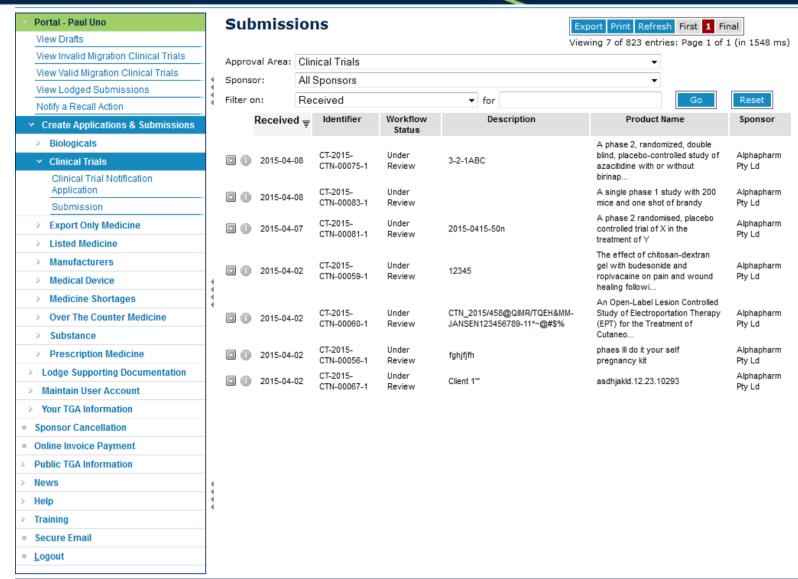


















Clinical Trials Submissions

Before submitting your application(s) please read the declaration below and click the Accept button to proceed with this submission; or click on the Decline button to return to the Submission form.

In this declaration, unless the contrary intention appears:

I means the individual assigned to the eBS login ID associated with the submission of this form to the TGA.

Secretary means the Secretary of the Department of Health and includes a delegate of the Secretary.

Sponsor means the company, organisation, institution, body or individual that is notifying the TGA as named in the 'Sponsor Name' field located on the application tab of this notification.

Declaration

By clicking the Accept button:

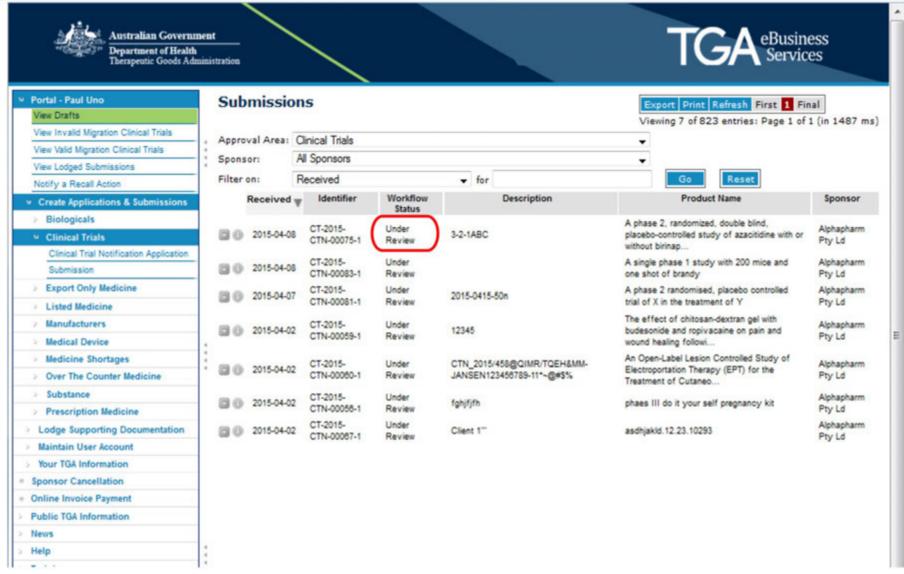
I declare that I am authorised by the sponsor to notify the TGA on its behalf in relation to this clinical trial.

I acknowledge that:

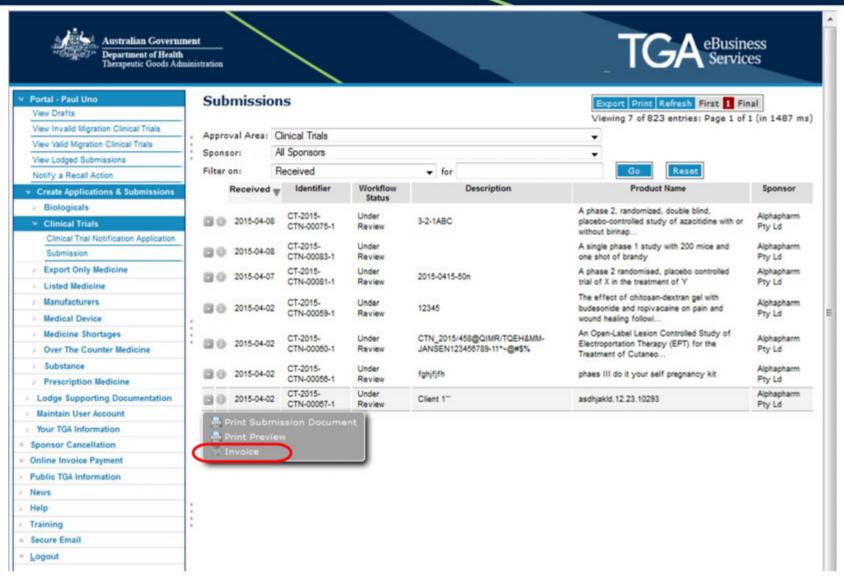
- The sponsor is taking overall responsibility for the trial
- . the relevant goods only remain exempt by reason of their use in the clinical trial only for so long as:
 - o the approval of the goods for the trial has been given by the sponsor having regard to the advice of the ethics committee responsible for monitoring the conduct of the trial, on terms no less restrictive than terms advised by that committee
 - o the sponsor has not received advice from the committee that is not inconsistent with the continuation of the trial
 - o the requirements in regulation 12AD of the Therapeutic Goods Regulations 1990 (in the case of therapeutic goods other than medical devices) and regulation 7.5 of the Therapeutic Goods (Medical Devices) Regulations 2002 (in the case of medical devices) are complied with, including that the use of therapeutic goods in the trial must be in accordance with the Guidelines for Good Clinical Practice as defined in the Therapeutic Goods Regulations
 - the Secretary has not under Item 3 of Schedule 5A of the Therapeutic Goods Regulations (in the case of therapeutic goods other than medical devices) or Item 2.3 in Part
 2 of Schedule 4 of the Therapeutic Goods (Medical Device) Regulations 2002 directed that the trial not be conducted on the basis that the Secretary has become aware
 that to conduct the trial would be contrary to the public interest
- the Secretary can under the Therapeutic Goods Act 1989 (the Act), require the sponsor to provide specified information or documents relating to any exempt goods
- the Secretary can provide information obtained in response to an authority or the Commonwealth, or a State or Territory that has functions in relation to therapeutic goods or the registration or medical practitioners or pharmacists in the relevant State or Territory
- it is an offence under the Act to fail to provide that information or documents required by the Secretary, or to provide information or documents that are false or misleading in a material particular, to the Secretary
- it is a requirement of the Guidelines on Good Clinical Practice that the sponsor report all serious and unexpected adverse reactions arising from the use of the relevant goods in the trial to the TGA
- it is a serious offence under Commonwealth law to provide information for the purposes of this notification that is false or misleading in a material particular.

I declare that all information provided for the purposes of the notification is true and accurate and that all required information has been included.

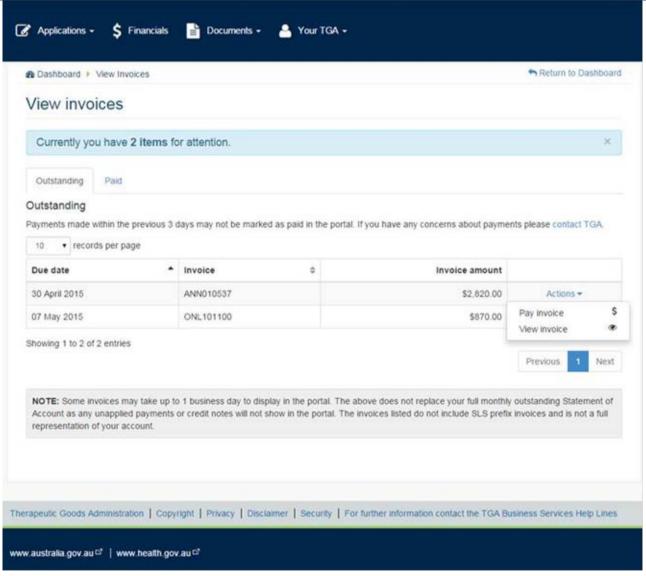




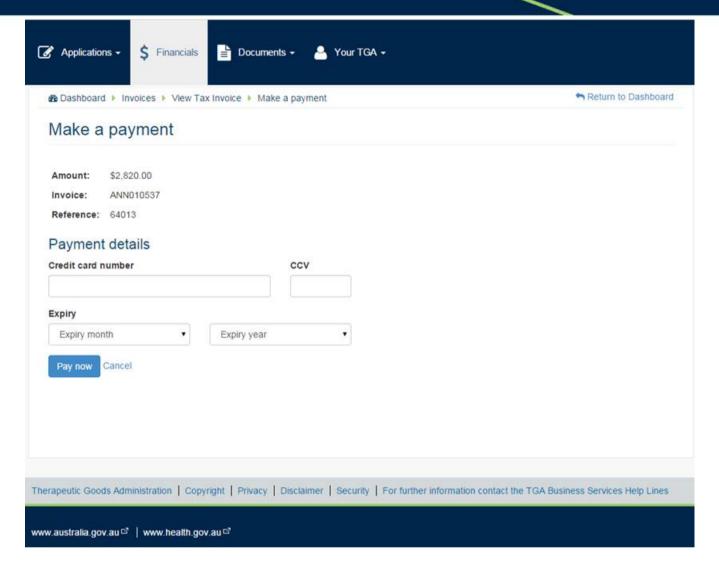




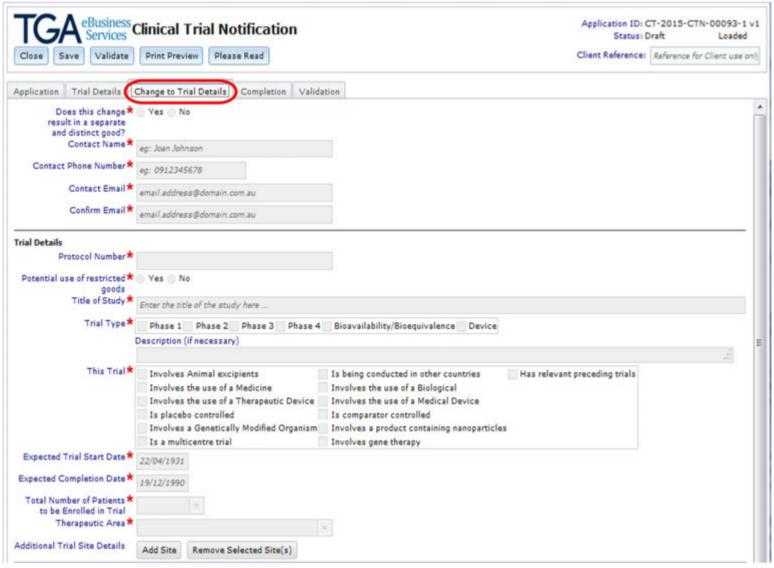














Questions?

Enquiries: clinical.trials@tga.gov.au



Australian Government

Department of Health

Therapeutic Goods Administration