

Best Practice Guide for Regulatory Affairs in a German CRO

**From Application to Clinical Trial Report: Implications of
Well-Structured Completion of Relevant Steps**

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vorgelegt von

Elke Gurschke

aus Düsseldorf

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Betreuerin und 1. Referentin: Frau Dr. Ingrid Klingmann

Zweiter Referent: Herr Dr. Bob Wilffert

Preface

The idea for this master thesis came to my mind while recently discussing with a client of our institute about the necessity of notifying a substantial amendment of a clinical trial to the responsible local authority (LA). Even in large pharmaceutical companies, there is sometimes only poor knowledge about the regulatory requirements of the application process and as well during the conduct of a clinical trial for trials conducted in Germany. Guidance documents, e.g. of the European Community, may serve as road signs for what will be needed, but reality differs quite a lot, especially when dealing with Ethics Committees (ECs), and therefore a “Best Practice Guide” may help to find a way through the regulatory jungle.

In my daily work as Regulatory Affairs Manager in a CRO in Neuss, Germany, I normally have to deal with the Federal Institute for Drugs and Medical Devices [*Bundesinstitut für Arzneimittel und Medizinprodukte (BfArM)*] in Bonn, Germany, as responsible competent authority (CA) due to our specialisation on medicinal products for the treatment of diabetes. The responsible Ethics Committee is the Ethics Committee of the Medical Association North Rhine (*Ethikkommission der Ärztekammer Nordrhein*) in Düsseldorf, Germany, as long as we are conducting mono-centre trials or multi-centre trials as leading site.

Very often, our regulatory department will only do the application for authorisation of a clinical trial to the EC, whereas in most cases the submission of the relevant documents to BfArM remains in the responsibility of the sponsor. This may be subject to those documents, which contain manufacturing details, and company secrets not dedicated to be given to people not belonging to that company. Although non-disclosure agreements are in place on a regular basis, most companies probably prefer not to reveal more details about their product than necessary. IB (Investigator’s Brochure) and protocol must be submitted to EC as well, but the IMPD – the (more or less complete) dossier of the investigational product – contains of detailed information in connection with the product and will only be submitted to BfArM.

According to § 42(1) German Drug Law (*Arzneimittelgesetz – AMG*), the responsibility of the EC results from the trial site in which the principal investigator (PI) for the respective trial is situated. The PI is responsible for the conduct of the trial at this very

trial site according to the local laws and regulations, e.g. GCP Ordinance, Drug Law, and in agreement with the protocol, and other relevant documents. For mono-centre trials, this allocation is clearly defined, but in multi-centre trials each trial site has a principal investigator. In this case, a so-called coordinating investigator must be chosen and “his” or “her” EC will act as leading EC whereas all other participating ECs are mainly responsible for the evaluation of the suitability of the trial site(s) belonging to that EC. The leading EC, however, is supposed to assess the clinical trial after consultation with the participating ECs.

In order not to complicate the following deliberations, I will mainly refer to requirements for a mono-centre trial for which our department is responsible for applications to both EC (here: Ethics Committee of the Medical Association North Rhine) and CA (here: BfArM).

The responsibility of the local authority(ies) as further actor in the regulatory scenery according to § 67 AMG and § 12 GCP Ordinance is well described through the localisation of the trial site. In Germany, several local authorities are in place and may be found on the website of the Central Authority of the Länder for Health Protection with regard to Medicinal Products and Medical Devices (*Zentralstelle der Länder für Gesundheitsschutz bei Arzneimitteln und Medizinprodukten – ZLG*). In our case, we have to notify trial activities to the Inspectorate for clinical trial sites in North Rhine-Westphalia (*Inspektorat für klinische Prüfstellen in Nordrhein-Westfalen*) and / or to the Regional Council (*Bezirksregierung*), both situated in Düsseldorf. The Inspectorate is responsible for the monitoring of all trial sites in the federal state, including universities, whereas the Regional Council has to observe activities of other parties, such as laboratories and CROs. If our pharmacy is performing manufacturing activities for the respective trial, or if we carry out other activities, which fall within the responsibilities of a contract research organisation, e.g. application to EC or BfArM, we have to notify to both authorities – which is the norm for trials conducted at our institute.

Anyone who is dealing with Paul-Ehrlich-Institute, the Federal Institute for Vaccines and Biomedicines (*Paul-Ehrlich-Institut, Bundesinstitut für Impfstoffe und biomedizinische Arzneimittel*) in Langen, Germany, instead of BfArM, one of the other German ECs or other LAs may have experienced divergent formal requirements, various contents of

deficiency letters, and different ways of communication – the comparison of these differences may be subject to another master thesis.

Please note: In the course of this master thesis, German expressions will be written in italics.

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List of Abbreviations

AMG	<i>Arzneimittelgesetz</i> (German Drug Law / German Medicinal Products Act)
ASR	Annual Safety Report
BfArM	<i>Bundesinstitut für Arzneimittel und Medizinprodukte</i> (Federal Institute for Drugs and Medical Devices)
CA	Competent Authority
CIOMS	Council for International Organizations of Medical Sciences
CRO	Contract Research Organisation
CTD	Common Technical Document
EC	Ethics Committee
EEA	European Economic Area
EFGCP	European Forum for Good Clinical Practice
EU	European Union
EudraCT	European Union Drug Regulating Authorities Clinical Trials
GCP	Good Clinical Practice
GCP-V	<i>Verordnung über die Anwendung der Guten Klinischen Praxis bei der Durchführung von klinischen Prüfungen mit Arzneimitteln zur Anwendung am Menschen</i> (German GCP Ordinance)
IB	Investigator's Brochure
ICH	International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use
IMP	Investigational Medicinal Product
IMPD	Investigational Medicinal Product Dossier
LA	Local Authority

<i>PEI</i>	<i>Paul-Ehrlich-Institut – Bundesinstitut für Impfstoffe und biomedizinische Arzneimittel</i> (Paul-Ehrlich-Institute – the Federal Institute for Vaccines and Biomedicines)
PI	Principal Investigator
PIC	Participant Informed Consent Form
PIS	Participant Information Sheet
QP	Qualified Person
RAM	Regulatory Affairs Manager
SOP	Standard Operating Procedure
SUSAR	Suspected Unexpected Serious Adverse Reaction
TIF	Trial Investigator File
TSE	Transmissible Spongiform Encephalopathy
<i>ZLG</i>	<i>Zentralstelle der Länder für Gesundheitsschutz bei Arzneimitteln und Medizinprodukten</i> (Central Authority of the Länder for Health Protection with regard to Medicinal Products and Medical Devices)

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1 Introduction

1.1 Legal Basis

Clinical trials are relevant parts of the development and for the marketing authorisation of medicinal products, as well as after authorisation, to gain further knowledge about the product. After implementation of the Declaration of Helsinki in 1964 [43], with its sixths revision in October 2008, and the Guideline for Good Clinical Practice of the International Conference on Harmonization [27] (ICH, Topic E6) as of 17 July 1996, last amended in July 2002 [28], basic principles considering the latest scientific and safety developments have been laid down for the safeguard of trial participants, and the correct designing, conducting, recording and reporting of trials to achieve at last credible and reliable data.

As of 4 April 2001, the basic principles for the conduct of clinical trials have been laid down in Directive 2001/20/EC [11] of the European Parliament and of the Council, the so-called “Clinical Trials Directive”. These principles should approximate laws, regulations, and administration of the Member States of the European Union, and result in the implementation of good clinical practice in the conduct of clinical trials throughout the EU. Through a profound risk assessment of the results of preclinical investigations and previously conducted clinical trials by the Ethics Committees and the relevant competent authorities of the respective Member State, it should be guaranteed that the safety and well-being of the trial participants, and the preservation of their very own data will be protected in every respect. Further substantiation was gained by the implementation of the “GCP Directive”, the Commission Directive 2005/28/EC [4], with principles and detailed guidelines for good clinical practice for clinical trials in humans. Requirements for the aspects of manufacturing and/or importation of investigational medicinal products can also be found in this Directive. For clinical trials, which are conducted outside the EU but their results should be implemented in an application for marketing authorisation of a medicinal product within the EU, Annex I Part 4 of Directive 2001/83/EC [12] must be considered.

Of main importance was the implementation of Directive 2001/20/EC [11] for the conduct of multinational, multi-centre clinical trials, due to the previous difference of action regarding the conduct of clinical trials within the EU. To facilitate information flow between all Member States, a European databank had been established – EudraCT (European Union Drug Regulating Authorities Clinical Trials) [15] – within the European Medicines Agency (EMA). EudraCT contains information from all clinical trials from 1st May 2004 onwards. At present, EudraCT Version 7.0 is used for the application form, whereas Version 8.0 should have been released in October 2010, but the start of the new version was postponed to a later date (now expected to be activated on 10 March 2011) due to the complexity of the final steps of implementation. Access is granted for the competent authorities of all Member States, and the use of the public website of this databank is obligatory as sponsor interface for applications of authorisation of a clinical trial. A detailed guidance [10], a manual for users [16], and a list of frequently asked questions [14] regarding the functionality of this database should enable all users to make efficient use of the application documents.

EudraLex, Volume 10 – Clinical trials guidelines [20], should serve as collection of superior European regulations, guidelines, and guidances. Of great help for the understanding of the application procedure is Chapter 1: “Application and Application Form” with detailed guidance documents for the request for authorisation of a clinical trial, notification of substantial amendments, and declaration of the end of the trial to the competent authorities [7], for application for an Ethics Committee opinion [8], and on the EudraCT clinical trials database [10].

The European Directive [11] had been transferred into German law in August 2004 with the 12th amendment of the German Drug Law – *AMG (12. AMG-Novelle)*. Consequently, a few days later the German GCP Ordinance (*GCP-Verordnung*) [41] had been established as guidance document for the conduct of clinical trials with medicinal products in humans, which was last amended in November 2006. Since then, a clinical trial must not be conducted without having received a positive opinion of the responsible Ethics Committee, and an approval (explicitly or implicitly, depending on the nature of the medicinal product) of the competent authority. The 14th

amendment of the German Drug Law was the national adoption of Directive 2001/83/EC [12], and meanwhile, the 15th amendment of the German Drug Law (15. AMG-Novelle) [22] is effective as of July 2009.

Of the German Drug Law [22], especially the articles 40-42a have to be considered for the application for authorisation of a clinical trial, whereas for example articles 1 to 4 provide aim and scope of this law, and as well definitions.

The GCP Ordinance [41] must be considered in total, and provides general provisions for all participants of the authorisation process, such as applicant, competent authority, Ethics Committee, and local authorities.

Information to the application process, required documents, and the timelines may also be obtained through the websites of the relevant parties, e.g. either PEI or BfArM for the competent authorities in Germany, the Central Authority of the Länder for Health Protection with regard to Medicinal Products and Medical Devices – ZLG for the local authorities, and the Working Group of the Medical Ethics Committees in Germany (in the following called EC Working Group), or their own websites, respectively, for the Ethics Committees (cave: the Ethics Committee of the Medical Association North Rhine is not part of this EC Working Group, may have different views of relevant topics and may therefore not follow the recommendations of the EC Working Group). For applications to BfArM or PEI especially the joint 3rd notification [1] is of great help for understanding the specific requirements.

The review of any application or amendment in the course of the trial will be charged according to the scales of fees and charges of the respective institution. For BfArM the attachment of the *AMGKostV* [32] has to be considered (e.g. between 1,500 and 3,700 EUR for the process of authorisation of a clinical trial). For the review of the Ethics Committee, charges may be identified through the website of the respective EC – they may differ in each case. For the local authorities, the cost laws and cost ordinances of the respective federal state apply. For North Rhine-Westphalia these are *Gebührengesetz für das Land Nordrhein-Westfalen (GebG NRW)* [21] and *Allgemeine Verwaltungsgebührenordnung (AVerwGebO NRW)* [2], with fees between 25 EUR and 250 EUR for checking and confirming the notification of the conduct of or amendments to a clinical trial according to § 67 German Drug Law [22].

1.2 Local Requirements

As already to some extent described in the preface, a regulatory department is mandatory for a CRO, which is not only dealing with the conduct, but also with applications for authorisation of clinical trials. While communicating with the several involved parties, more and more expertise is gained, and herewith the application process will become easier in the process of time and (at least formal) mistakes can be more and more avoided. However, especially in case of the Ethics Committee with changing composition of its members, you will never be sure to have all documents in order, but in most cases it can only be an approach to an application without any failures or contentual deficiencies.

A regulatory department must at least contain of two responsible persons who should work together on a regular basis, and who can substitute each other in case of holidays or illness. In our case, a third employee serves as back-up, and is always copied in the relevant e-mails, is part of the fax group for all faxes coming from the authorities and the Ethics Committee, and so receives all necessary information to be able to step in just in case.

The qualification to work as a Regulatory Affairs Manager should be a profound scientific training with focus on at least basic medical knowledge, e.g. Physician, Pharmacist, Biologist, Nutritionist, or possibly a Nurse or Doctor's Assistant with good skills in English, interest in administrative activities, and ability to well-structured and accurate work. Communicative skills are very relevant as well, since more or less regular consultations with the involved parties will occur. For the study teams, it is more than helpful in the beginning of the application process that the regulatory department is able to discuss important issues directly with employees of the sponsor (mostly in English) and, of course, with the regulatory authorities.

2 Initial Application

2.1 Responsibilities

The responsibility to apply for a clinical trial authorisation remains with the sponsor according to § 7 GCP Ordinance [41] – nevertheless, the sponsor may delegate the application to a third party, ideally an experienced CRO. For this purpose, a letter of authorisation should be created to clarify this delegation to the authorities. Additionally, a responsibility split list (which is normally part of the contract between the parties) should be added to the EC submission package to identify the responsibilities regarding relevant duties.

If the sponsor's place of business is not situated within the European Union or another state of the European Economic Area – EEA – which are, in addition to the EU Member States, Norway, Liechtenstein, and Iceland, a legal representative within the EEA must be available who will be legally responsible for all trial activities instead of the sponsor. To clearly identify these duties, a letter of authorisation from the sponsor, and as well a responsibility confirmation letter of the representative should be submitted to avoid inquiries of EC and BfArM.

2.2 First Steps

To be able to submit the application for a clinical trial authorisation, it will be necessary to identify the concerned EC and CA, and to clarify the local requirements in form and content. Neither the European directives nor the local implementations in Germany, *GCP-V* [41] and *AMG* [22], give detailed information about the format and quantity of the documents that have to be submitted. As outlined before, the nature of the investigational medicinal product defines the responsibility of the competent authority – BfArM or PEI – whereas the EC will be determined through the investigational site in which the principal investigator for mono-centre trials or the coordinating investigator for multi-centre trials, respectively, is situated.

The BfArM requirements may be detected easily by visiting the website, and reading the relevant documents, or just by calling the secretary, but for EC requirements it is much more difficult to find out what is really required – despite any recommendations, e.g. from the EC Working Group, each EC seems to have their own way to deal with the submissions. For the Ethics Committee of the Medical Association North Rhine, the requirements will be specified in the following.

2.3 Timelines and Formal Requirements

2.3.1 Ethics Committee

The timelines for the review process in all German ECs are presented in the *GCP-V* [41]. For the first review period, there are 30 days for mono-centre and 60 days for multi-centre trials. After receipt of the application package, a clerk will check the documents formally. If anything is missing, a letter stating formal deficiencies will be sent to the applicant within 10 days. The applicant has 14 days to answer these deficiencies – the review period does not begin until a formal correct application has arrived at the EC. To avoid any delay in the application process, we therefore always try to manage a formal complete submission on the first attempt.

If there are any contentual deficiencies – and usually there are some, mainly in the participant information sheet – the review period stops by sending the corresponding notification to the applicant. Since the EC has 30 days overall to give their vote, the notification of contentual deficiency will be sent about day 20-22 of the whole review period. In this so called “stop clock period” the applicant now has to reply to the deficiencies – either by implementing them into the relevant documents or by defending his position.

After resending the answer to the raised deficiencies, the remaining review period starts, and the final opinion will be sent after a total of 30 days.

In the following overview, two scenarios are presented: on the one hand a formal complete submission without contentual deficiencies as best case, on the other hand an application with formal and contentual deficiencies as worst case scenario.

Best case

Day after submission = day 1 = start of review period → no formal deficiencies → no contentual deficiencies → positive opinion on **day 30**



Figure 1: Review period EC / Best case

Worst case

Day after submission = day 1 → notification of formal deficiencies on day 10 → answer to deficiencies 14 days later (at the latest) = start of review period → ca. on day 44: contentual deficiencies → clock stop / e.g. 30 days to answer to deficiencies → restart of review period on day 74 → positive opinion on **day 84**

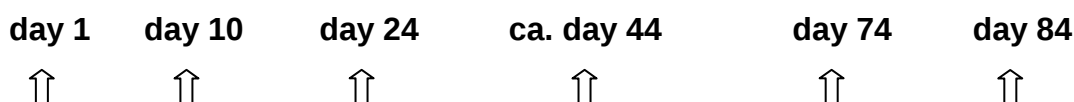


Figure 2: Review period EC / Worst case

All documents will have to be submitted ninefold in folders, and we always use an index in each folder to facilitate the review for the EC members. The files will have to be saved on a CD ROM as well, either as pdf file or – in the case of the application form – as xml file.

It is of great importance that the EC vote will be given explicitly – which means that the applicant must not start the trial without a definite favourable opinion in writing.

2.3.2 BfArM

In general, the documents for BfArM will have to be submitted similar to the documents for the EC – in good order, clearly structured and not only as paper copies (fourfold) but also on CD ROM as pdf and xml files. After a formal complete submission – in case of formal deficiencies the same timelines as with EC apply – the review time is also 30 days. In case of contentual deficiencies, however, the timelines are a bit different because the applicant will receive the notification letter after 30 days,

and will have to respond within 90 days. In case the deficiencies cannot be answered timely, the application will be rejected, but a resubmission may be conducted at a later stage. After answering within the timeline, BfArM has another 15 days to approve or disapprove the application. Therefore, in case of contentual deficiencies the BfArM review time is 45 days altogether, whereas for the EC it remains at 30 days.

Best case

Day after submission = day 1 = start of review period → no formal deficiencies → no contentual deficiencies → approval on **day 30**



Figure 3: Review period BfArM / Best case

Worst case

Day after submission = day 1 → notification of formal deficiencies on day 10 → answer to deficiencies 14 days later (at the latest) = start of review period → on day 54: contentual deficiencies → 90 days to answer to deficiencies → 15 days review period of answer → approval on day 45 of review period = **159 days**

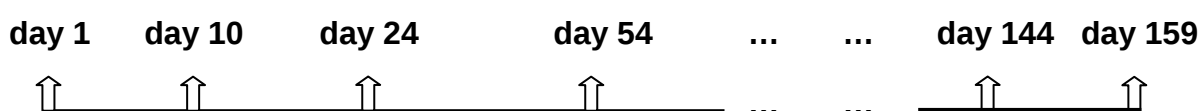


Figure 4: Review period BfArM / Worst case

For BfArM an implicit vote will be sufficient in many cases – which means that the trial may begin after the deadline of the review period, if BfArM “has not raised grounds of non-acceptance”, according to Directive 2001/20/EC [11], and no contentual deficiencies have been observed. Nevertheless, normally BfArM will send an approval letter, though. If an implicit authorisation is impossible, BfArM will inform the applicant accordingly in the written confirmation of receipt of a formal correct submission. This is subject to the nature of the IMP according to § 42(2) sentence 7, no. 1 AMG [22] in connection with no. 1 and 1a of the Annex of Regulation (EC) No 726/2004.

For example in case of insulin, which is manufactured by means of recombinant DNA technology, the authorisation will be given explicitly within the given deadline of 30 days.

According to this regulation, this is the fact also for all other “Medicinal products developed by means of one of the following biotechnological processes:

- recombinant DNA technology,
- controlled expression of genes coding for biologically active proteins in prokaryotes and eukaryotes including transformed mammalian cells,
- hybridoma and monoclonal antibody methods.” [37]

2.4 Required Documents

2.4.1 Ethics Committee

Cover Letter

The cover letter is the first document in the submission package, but the last one that should be finished. All submitted documents should be listed with date and version, and the letter should contain of the EudraCT number, the title, and the protocol ID. In our cover letters, this information is placed right below the subject line, and will be used, together with the serial number of the EC, for all subsequent letters to the EC (e.g. answers to contentual deficiencies, amendments or notifications).

Because last minute changes occur very often, the cover letter cannot be considered final before all other documents are ready. It happened not only once that in the last review of the submission package by one of our project managers (they have to finally release all files) one or more mistakes were detected, and had to be corrected in the corresponding document(s). This results in new versions, maybe new dates, and as well a new cover letter.

The cover letter should also contain of the confirmation that electronic and paper version of all submitted documents are identical.

The following details should be mentioned in the cover letter:

- Name and address of the sponsor
- Name and address of the legal representative, if applicable
- Name and address(es) of the trial site(s) with the names of the principal investigator(s) and all subinvestigators
- Name and address of the coordinating investigator (in case of a multi-centre trial)
- Addresses of all involved CROs and Laboratories
- List of all submitted documents with version and date
- Useful information to clarify possibly ambiguous issues, e.g. additional information to the subject's insurance

The German template of a cover letter to the EC will be provided in Annex 1.

Confirmation of EudraCT Number

The confirmation e-mail of EudraCT must be submitted together with the application. If you have applied for the EudraCT number yourself, you should have saved this e-mail; otherwise, the respective person who did this application should forward it prior to the submission.

Checklist

The EC Working Group has provided another document, which is called "*Checkliste: Erforderliche Antragsunterlagen für Studien nach AMG*" (Checklist: Requested application documents according to German Drug Law). This document corresponds to attachment 1 of the detailed guidance for the submission to CAs in the European Union, revision 2 [6] (now replaced by revision 3 of March 2010) [7], where the required information for applications to ECs and CAs, sorted by Member States, are listed. It is also a reflection of § 7 German GCP Ordinance [41], where all required application documents and requirements are listed.

Section J, the “Check list of information”, will be found in the main menu of the EudraCT application page. It reflects the checklist of the German EC Working Group in several issues, although this checklist amplifies many of the sub-items of Section J. For example, paragraph 3.4 of Section J only asks for an “Ethical assessment made by the principal/coordinating investigator, if not given in the application form or protocol” but in the checklist, there are several sub-items to this question. For example, information should be provided regarding the justification of gender distribution, inclusion of minors or incapable participants, hindering from participation in other trials, criteria for premature termination of the trial, that may be regarded as part of the overall ethical assessment of the trial. For all of these sub-items, instead of providing separate documents or statements, a reference to the associated documents may be possible – this will have to be discussed with the EC in charge for that application. Otherwise, there would be a repetition of details already provided in module 2, in the protocol, or in the German summary.

The German template of a partly completed checklist for application documents will be provided in Annex 2, whereas the current template of Section J can be found in Annex 3.

CTA form

In our experience, the CTA form is of detailed interest only for BfArM because we never had any comments to this document from the EC. In the EC guidance document it is only mentioned as to give “an easy overview of the trial design and an evaluation of the expertise needed for the review” [8], but no word that it should be reviewed itself. Therefore, I will describe the content in the respective chapter for applications to BfArM. The versions for EC and BfArM only differ slightly. When printing the pdf file for the EC, the BfArM address and the submission status to BfArM will be shown in section H.2.1, whereas in section C.2 the contact details of the applicant to the EC will be given. On the first and last page, the Ethics Committee will be stated as addressee of the submission. When printing the pdf file for BfArM, it is just the other way round.

Nevertheless, this version must be signed and dated by the applicant, and sent to the EC as pdf file and xml file as well. Our EC told me once that they use the xml file to

copy out some passages (e.g. the title) for their own documents, maybe an answering letter or lastly the (positive) opinion. Normally, no word file will be sent to the EC, but only pdf files, so the possibility to copy the title is otherwise rather limited.

Module 2

Module 2 represents an optional application form for national or local Ethics Committees, which is requested by our EC on a regular basis. An English template of this module is given in attachment 4 of the EC guidance document [8], but for Germany the use of a German version will of course be required.

The required information ranges from EudraCT number and title, to giving the reason in case of including specific subject groups (e.g. minors), description of the recruitment procedure, risk assessment, data protection, through to sources of funding, and financial disclosure information of the investigators. Overall, this document represents an overview about all issues that will be assessed by the EC in particular when reviewing the submitted documents.

The EC Working Group has provided a template, which may be used. It is helpful to create a template for your organisation, and already insert applicable iterative text, e.g. the description of the recruitment procedure or procedures used to protect the privacy of recorded data. Therefore, only little information will have to be inserted in connection with the recent trial, and the document may be finished rather soon after finalisation of the reference documents. Since the date of signing module 2 will have to be entered in the checklist, module 2 must be finalised prior to the checklist.

We have agreed upon with our EC to just refer to other documents in the submission package in order to avoid a superfluous overload of the submitted documentation, if the information required in module 2 would only be a repetition of details provided elsewhere, for example the protocol or the German summary.

The German template of a partly completed module 2 to the EC will be provided in Annex 4, and the blank English template of this module will be attached in Annex 5.

Protocol

The protocol of the clinical trial is one of the most important, if not the most important document in connection with the conduct of a clinical trial. According to ICH GCP, it is “a document that describes the objective(s), design, methodology, statistical considerations, and organisation of a trial. The protocol usually also gives the background and rationale for the trial, but these could be provided in other protocol referenced documents.” [27]

Usually, writing or reviewing of a clinical trial protocol does not count within the responsibility of a regulatory affairs department. Nevertheless, sometimes you may be asked to check the protocol regarding ethical questions or other aspects, falling slightly within this area (e.g. insurance, SUSAR reporting), and therefore it is helpful to know about the requirements. A full-service CRO should have sophisticated personnel to write complete protocols if requested, or at least to provide adequate assistance, especially for less experienced pharmaceutical companies.

For clinical trials with diabetic patients or in the field of diabetes, respectively, which is our main area of operation, the Guideline on clinical investigation of medicinal products in the treatment of diabetes mellitus [24] should be considered. For other fields of interest, the respective guidelines should be looked up at appropriate sources, e.g. the European Medicines Agency.

In general, you will have to think about these issues when writing a clinical trial protocol:

- What is the planned experimental intervention?
- Have there been any previous trials? What were the results?
- What are the toxicities and side effects of the IMP, if any?
- Will there be any control groups? What is their treatment, if any?
- How will the trial be performed, e.g. number of visits, treatments, drug application?
- How will the monitoring be planned?

- What are treatment options for the participants or will they receive the study drug furthermore after the trial has ended?
- Are there any long-term follow-ups?
- Who will be responsible for what?

Resulting from these considerations, these main issues will have to be addressed in the protocol according to ICH GCP:

- General information
 - Title of the trial, protocol identifying number, version, and date
 - Contact details of all relevant persons/parties in charge
- Background information
- Detailed information to the IMP such as
 - Name and description
 - Summary of previous non-clinical and clinical trials
 - Risk-benefit assessment
 - Description of the dosage, route of administration, and treatment periods
- Description of the trial population
- Trial objective(s) and purpose
- Trial design
 - Statement of endpoint(s)
 - Description of trial design/type (information e.g. to blinding, control, etc.) with an overview of procedures and stages
 - Description of treatments and dosage (including dosage form, packaging, and labelling)
 - Description of sequences and their duration, including overall duration
 - Discontinuation rules
 - Accountability procedures for IMP(s) and placebo(s)
 - Procedures for randomisation

- Identification of source data
- Selection and withdrawal criteria
 - Inclusion, exclusion, and withdrawal criteria
- Treatments
 - IMP(s) with name, dosing, route of administration, treatment schedule
 - Non-permitted and permitted medication (including rescue medication) or treatments
 - Monitoring of compliance
- Assessment of efficacy and safety
 - Specification of parameters
 - Methods and timing of assessment, recording, and analysis
 - Follow-up of adverse events
- Statistics
 - Description of statistical methods including procedures for reporting of deviations
 - Number of participants in each trial site
 - Level of significance
 - Criteria for termination of the trial
 - Accounting of missing or unused data
 - Selection of participants included in statistical analysis
- Access to source data/documents
- Quality control and assurance
- Ethical considerations
- Data handling and record keeping
- Financing and insurance (may be provided in separate documents)
- Publication policy (may be provided in a separate document, e.g. the contract)
- References

After finalisation of the protocol, all other documents basing on the protocol can be issued, e.g. the PIS/PIC, and the case report forms. The regulatory affairs department should take care for obtaining the signatures of both principal/coordinating investigator and representative of the sponsor. Without these protocol agreements, the application would be regarded as formal incomplete. If there are any attachments mentioned in the protocol, such as an internal approval form of the sponsor, or a list of relevant departments, those should be submitted as well.

German Summary

The German summary of the protocol must be provided to the EC, if the protocol is written in English. There are no formal requirements in place for the summary in the national language. Of main importance is the comprehensibility for the lay reviewers in the Committee, such as lawyers.

In general, the summary should follow these main headlines, which are basically consistent with the World Health Organization (WHO) trial registration data set [44]:

- Public title (lay title)
- Health condition(s) to be studied
- Description of intervention(s) and control treatment
- Primary outcome
- Key secondary outcome/s
- Key inclusion and exclusion criteria
- Trial type
- Purpose of the trial
- Allocation to intervention
- Blinding status
- Control group (placebo or active treatment)
- Assignment (parallel, cross-over, cluster, other)

- Anticipated start date and duration
- Target sample size

In the course of the last years, we have developed a template (see Annex 6), which is sufficient for the review of the EC, and gives a brief overview for all members of our teams, but it is not regarded as essential document (such as protocol or PIS/PIC) for the conduct of the trial. Our purpose was as well, to follow the issues of module 2 and the checklist of the EC working group, which facilitates the referencing to the German summary. Some information out of this document will be used for the cover letter to BfArM, because these details, among others, should be provided according to § 7 GCP Ordinance [41].

These are:

- Information on special features of the clinical trial
- Plan for further treatment and medical care of participants after the end of the trial
- Justification for the gender distribution

Participant Information Sheet / Informed Consent Form

One of the main documents, or in our experience, the main document for the review of the EC is the participant information sheet (PIS) with detailed information for the trial participants, and the declaration of consent – either as separate document (PIC) or as part of the PIS.

The Working Group of the Ethics Committees in Germany has provided a template on its website (see Annex 7a), which covers all relevant aspects of this document, and which may be adapted for the specific needs. Sometimes, also a participant diary or a separate PIS/PIC for an additional voluntary activity (e.g. pharmacogenetic investigation) shall be used. These documents must also be reviewed by the EC prior to usage.

A constant update of the PIS/PIC helps to insert all relevant changes, which may have occurred in the past trials and may be of general importance for other trials as well, and to match all requirements of the EC (see “Deficiencies”, chapter 2.5).

The main issues for the PIS/PIC are:

- Who is the sponsor of the trial?
- Why will this trial be performed? What are the investigational products?
- What are the activities of the trial? What should be considered before consent?
- What are the risks and benefits?
- Who may / may not participate?
- Will participants be informed about new data affecting their consent?
- Who will decide whether participants should be excluded from the trial?
- What happens to data and material (e.g. blood or tissue samples) of the participants?
- How will the participants be compensated?
- How will the participants be insured?
- Who may be contacted, e.g. in case of emergency?
- Which data protection measures are in place?
- How will the consent be obtained?
- Signatures (place, date, time, full name) of investigator and participant

Patient Card

To provide the trial participants with all necessary information in case of emergency in connection with the trial or any required medically intervention apart from the trial, it will be useful to create a patient card. The participants should carry along their card during the whole trial. The card should consist of contact details of the sponsor and the CRO/trial site, should give information to the subject of the trial (e.g. investigation

of medicine for diabetics), and provide a unique identifier for the trial (trial ID, EudraCT number) to enable participants and/or other persons, e.g. physicians, to contact the responsible party in case of need.

Material for Recruitment

In module 2, a description of the recruitment procedure should be provided. In addition, the EC checklist asks for the justification of the inclusion criteria together with the statistical evaluation, and the recruitment procedures in paragraph 11.

To meet these requirements, any material for recruitment should be submitted (e.g. advertisement in newspapers). If no external recruitment is planned – this may be the case with clinical trials in hospitals, when the patients will only be asked orally to participate – a proposed advertisement should be submitted, nevertheless, to spare time and money. There may be difficulties to recruit enough patients, so that later on external recruitment may become necessary. In that case, an amendment would be mandatory to receive a positive opinion of the EC in charge for the text of the advertisement.

Investigator's Brochure

The investigator's brochure – IB is the document, which provides all relevant information about the investigational medicinal product and the rationale for conducting the respective clinical trial to the investigators and other involved persons/parties. They should be enabled to understand the given objective by getting precise information, and to relate the key aspects of the protocol with the nature of the IMP for their own assessment of the risks and benefits of the proposed trial to the participants.

For already marketed medicinal products, this document may be replaced by the summary of product characteristics – SmPC, or the national information for health professionals (in Germany: "*Fachinformation*").

The IB will be provided by the sponsor of the trial and, according to chapter 7 of the ICH-GCP Guideline [27], should consist of the following minimum aspects:

- Title page with sponsor's name, identity of the IMP(s), edition number, date
- Table of contents (example given in appendix 2 of the ICH-GCP Guideline)
- Summary (significant physical, chemical, pharmaceutical, pharmacological, toxicological, pharmacokinetic, metabolic, and clinical information)
- Introduction (chemical name; all active ingredients, pharmacological class; rationale for performing research with the IMP; indication; etc.)
- Physical, chemical, and pharmaceutical properties and formulation (including chemical and/or structural formula; instructions for the storage and handling of the dosage form; etc.)
- Performed nonclinical studies with discussion of the findings (including studies to potential therapeutic activity and safety)
- Effects in humans (information on pharmacokinetics, metabolism, pharmacodynamics, dose response, safety, efficacy, and other pharmacological activities; summaries of any completed clinical trials; etc.)
- Summary of data and guidance for the investigator (with overall discussion of the nonclinical and clinical data, and summary on different aspects of the investigational product)

Confirmations of Investigators

In all clinical trials, the principal investigator (and/or the sub-investigators, if any) must give several confirmations (e.g. financial disclosure statement). In order to provide the relevant information in one document we have created a template called *Erklärungen/Bestätigungen der Prüfer* (Confirmations of investigators) to cover all those aspects.

For our EC it will not be sufficient to have these confirmations given only by the principal investigator, but all investigators must sign them. The header states the title, the protocol ID, and the EudraCT number to assign the document clearly to the respective trial.

Sometimes, e.g. in case of holidays or illnesses, it may be difficult to obtain all signatures. Nevertheless, these statements will be required prior to submission of the application. Therefore, it is of great importance to issue these documents as soon as possible, and to hand them over to all investigators concerned.

According to the German GCP Ordinance [41] and German Drug Law [22] information must be given concerning:

- Information of each investigator about previous pharmacological-toxicological findings and the foreseeable risks of the clinical trial
- Adherence of investigators to data protection principles
- Informing of participants about disclosure of data in connection with § 12 and 13 German GCP Ordinance [41]
- Inclusion of participants relative to the sponsor or to the investigator
- Financial disclosure information of investigators

To follow these requirements easily, each investigator should confirm that

- he/she will read the protocol, the IB and/or SmPC to be informed about the pharmacological and toxicological data of the IMP and any possible risk for the participants, and all other relevant documents prior to any trial activities
- he/she will protect personal data of trial participants by using pseudonyms and that he/she will generally adhere to the principles of data protection
- he/she will inform the trial participants about the necessity to the disclosure of data to the relevant authorities in case of adverse events, and that participation in the trial will not be possible if consent in this respect cannot be obtained
- he/she will not include participants relative to the sponsor or to him-/herself
- he/she does not have any financial or other interest in connection with the IMP(s)

A German template of a suitable confirmation form is provided in Annex 8.

CVs/GCP Certificates

According to §7(3)6 GCP Ordinance [41], a current CV of all investigators must be submitted with the application. It may be in the responsibility of a RAM to remind the investigators to update their CVs as appropriate, and to attend regular GCP trainings, as this may be required as well by the EC (as it is with the EC of the Medical Association North Rhine). In our institute we have a personnel database for all relevant trainings with alerts at a given time to renew the trainings. For example, for GCP trainings, the period for renewal is 22-28 months.

It will be possible to include investigators who are not physicians according to § 7(2)6 GCP Ordinance [41], but their participation should be justified thoroughly by describing the respective activities in the trial, and the relevant professional qualification must be provided.

Authorisation Letter

If not the sponsor but an authorized party, such as a CRO, will be responsible for the application, an authorisation letter of the sponsor will be required. A template of such an authorisation letter may be provided to the sponsor to facilitate the execution.

The template of an authorisation letter is provided in Annex 9.

If the sponsor is not situated in an EU Member State, it may be useful to provide a responsibility letter of the legal representative within the EU as well. This letter should confirm, that the representative will take over all legal responsibilities for the conduct of the trial within the EU.

Contract

One of the requirements of the EC according to § 7(3)16 GCP Ordinance [41] is the proposed contract between the sponsor and the trial site. The main topics should be addressed, and the financing of the trial must be assured, although the document would not have to be final and signed prior to submission. Additionally, there is no need to reveal the budget to the EC.

One part of the agreement should be a responsibility split list to identify clearly the duties of each concerned party. The other part will be the work order for the specific trial, which could be rather short, if there is a master service agreement in place. The master service agreement is a contract that covers more than one trial, and will be useful, if there are repeated trials with the same sponsor.

Insurances

According to § 7(3)13 GCP Ordinance [41] in connection with § 40 (1)8 and (3) AMG [22], an insurance of the trial participants covering at least 500,000 EUR must be in place for cases of injury or death in connection with clinical trials. The insurance company must be based in the EU or another country of the European Economic Area. Whereas, in contrast to the statement in section 4.8 of the detailed guidance for applications to ECs: “Also the insurance or indemnity arrangements to cover the liability of the sponsor and investigator should be stated” [8], we were never asked for the insurance documents regarding liability of sponsor or investigator.

The confirmation or insurance policy, and other documents designated to be given to the participants, should be in German – otherwise the insured person would not be able to follow the requirements in case that an insured event occurs.

There are two subsets of possible insurances for the participants:

- **Subject’s Insurance**

This insurance is a mandatory document of the application package to the EC. It is of great importance to provide not only the specific confirmation of the insurance company, but also all other documents referred to in this confirmation. These are mainly the “General Conditions of Insurance” and any other listed documents, such as written or additional conditions. Those need not in any case be given to the trial participants, but must be reviewed by the EC, though.

The background for this requirement is the possibility of preclusive conditions in the additional documents concerning the trial participants or the proposed trial activities. For example, according to the written conditions participants of a certain age would be

excluded from the insurance, whereas pursuant to the protocol those age groups may be included.

It is within the responsibility of the RAM to check the insurance documents accordingly – also regarding the compliance of the versions mentioned in the confirmation and provided by the insurance company. For example, if the confirmation refers to “General Conditions” that belong to a yearly insurance contract, this version must be attached and not a version that belongs to a project contract (insurance only for this very trial).

A specific requirement of an EC (as for the EC of the Medical Association North Rhine) may be the following confirmation:

“The insurer confirms that the insurance itself continues to be valid even if the authorities recall their approval for the specific trial or put it on hold, if the site has proceeded with the conduction due to the lack of knowledge about this decision. Based on § 42a(4) AMG [22] the clinical trial has to be stopped immediately, if the authorities recall their approval for the specific trial or put it on hold”.

If you know about these or any other specific requirements, it will be of great help for the study team and the sponsor to make them aware of the missing documents or statements in order to avoid deficiency letters. Some sponsors may stick to their decision not to provide some documents or not to include the statement mentioned above, though, but they should at least be informed about the possibility of receiving a respective deficiency letter.

It is also recommendable to give some information about the duration of the insurance in the cover letter. Very often the general conditions of the insurance state: “The insurance is valid for adverse health effects from all clinical trials that have begun during the effectiveness of the insurance policy, regardless, if the insurance contract had already ended at the time of the insured event.” The reference to this (or any equal) statement in the submitted insurance documents is given in any of our cover letters to avoid inquiries from the EC.

- **Accident Insurance**

The EC Working Group recommends an accident insurance for all trial participants. This insurance should cover any accident on their way to the trial site(s) or on its grounds.

Depending on the members of the Ethics Committee in charge, it may be possible that they require a respective statement in the PIS, if no accident insurance was concluded. Furthermore, some members of the EC require a specific amount of the insurance, preferably also 500,000 EUR as with the subject's insurance. Due to the fact that the accident insurance is just a recommendation of the EC working group, and there is an ongoing discussion about the necessity among the ECs, by now this request does not need to be implemented, and it is up to the sponsor to decide whether this insurance should be in place or not.

Eligibility of the Trial Site

One topic of the EC review is the eligibility of the investigational site for the conduct of the proposed trial. The EC would like to prove that devices, equipment, and the personnel are adequate for the planned purpose. Previous experience with similar trials should be mentioned as well.

In our case, we send a complete overview of the local conditions to the responsible EC once a year (and any subsequent update of these conditions) to document the suitability of our institute to perform clinical trials with medicinal products or medical devices mainly in the field of diabetes. The EC returns a confirmation that they have approved the documentation, and that we may refer to that confirmation in the upcoming trials.

Case Report Forms

Some times before, the EC asked for draft versions of the case report forms. Since neither the GCP Ordinance [41] nor the German Drug Law [22] require a review of these forms, we have decided to oppose to this request. One reason is the fact that these forms normally are in a very early draft status at the point of application, and the

other reason is the frequent use of electronic CRFs. That would make it really difficult to provide a paper version for review.

2.4.2 BfArM

Cover Letter

The cover letter for BfArM is similar to this to the EC, and here it is also an effective means to provide essential or additional information, which the reviewing assessors may otherwise hardly detect in the application documents.

In the cover letter to BfArM you will also have to confirm that electronic and paper version of all submitted documents are identical.

The following details should be mentioned in the BfArM cover letter:

- Name and address of the sponsor
- Name and address of the legal representative, if applicable
- Name(s) and address(es) of the trial site(s) with the name(s) of the principal investigator(s)
- Name and address of the coordinating investigator (in case of a multi-centre trial)
- Addresses of all involved CROs and laboratories
- Address of the responsible Ethics Committee and, if applicable, of the competent authority(ies) of other MS
- Indications of particularities of the clinical trial and references to the sources of the respective information in the presented documents (for example first-time administration of the active substance to humans, administration to a special population of test subjects or patients, etc.)
- Plan for the further treatment and medical supervision of the affected persons after the end of the clinical trial according to § 7(2)13 GCP-V [41]
- Justification for the gender distribution of the group of affected persons according to § 7(2)12 GCP-V [41]

- Confirmation according to § 7(2)15 *GCP-V* [41] that the participants shall be informed of the dissemination of their pseudonymous data with the explanation that affected persons not consenting to the dissemination of information cannot be included in the clinical trial
- Confirmation according to § 5(2)2 *GCP-V* [41] that the telephone numbers of the sponsor and the CRO will be listed in accompanying documents (e.g. participant card and/or PIS/PIC), if not provided on the labels
- Confirmation according to § 5(2)11 *GCP-V* [41] that the EudraCT will be listed in accompanying documents (e.g. participant card and/or PIS/PIC), if not provided on the labels
- Confirmation according to § 5(2)10 *GCP-V* [41] that the protocol code will be listed in accompanying documents (e.g. participant card and/or PIS/PIC), if not provided on the labels
- Confirmation according to § 7(2)6 *GCP-V* [41] that only medical doctors are acting as investigators in the clinical trial or justification for involvement of non-medical investigators, respectively
- List of all submitted documents with version and date
- Useful information to clarify possibly ambiguous issues, e.g. additional information to the manufacturing licences or explanatory notes to clinical trials conducted with the same IMP

A German template of a cover letter to BfArM is provided in Annex 10.

CTA Form

The clinical trial authorisation application form is the Annex 1 of EudraLex – Volume 10 Clinical trials guidelines [20] and will be provided by EudraCT, the clinical trials database of the European Union. EudraCT is the platform for sponsors or authorized applicants to obtain the unique EudraCT number, which clearly identifies the clinical trial, and to fill out the application form, save it as xml file and print a pdf version for submission to Ethics Committee(s) and competent authority(ies).

Detailed guidance for the completion of this document is given in the EudraCT V7.0 User Manual [16], so in the following I will just give an overview.

To get a EudraCT number, the first step of the application process on EudraCT, you will have to go to the EudraCT homepage (<https://eudract.ema.europa.eu/>) and choose “Access to EudraCT v7 Application”.

On this welcome page, you have several options:

- EudraCT Number Step 1: [Apply for Security Code](#)
- EudraCT Number Step 2: [Apply for EudraCT Number](#)
- Create New Clinical Trial Application: [Click here to create a new Clinical Trial Application](#)
- Load Saved Clinical Trial Application: [Click here to load a saved Clinical Trial Application](#)
- Download CT Amendment Form: [Download CT Amendment Form](#)
- Download CT End of Trial Form: [Download CT End of Trial Form](#)
- Return to EudraCT Home Page: [Return to EudraCT Home Page](#)

Below, a screenshot of this welcome page is shown:

Welcome to EudraCT

For further assistance on use of the system and completion of the form, refer to 'Help' and 'FAQ' in the Banner above.

EudraCT Number:
You need a EudraCT number in order to provide a unique reference for clinical trials in one, or more, of the following circumstances. It is emphasized that one individual clinical trial should be identified by one unique EudraCT number:

- There is at least one investigator site in the Community.
- The clinical trial is contained in an agreed Paediatric Investigation Plan (PIP) (it may involve sites in the Community, in third country(ies) or both).
- The clinical trial is one of those for which information has to be submitted in accordance with article 45 of Regulation (EC) No. 1901/2006 as amended :
Article 45(1): "By 26 January 2008, any paediatric studies already completed, by the date of entry into force, in respect of products authorised in the Community shall be submitted by the marketing authorisation holder for assessment to the competent authority."
- The clinical trial is one of those for which information has to be submitted in accordance with article 46 of Regulation (EC) No. 1901/2006 as amended:
Article 46(1): "Any other marketing authorisation holder-sponsored studies which involve the use in the paediatric population of a medicinal product covered by a marketing authorisation, whether or not they are conducted in compliance with an agreed paediatric investigation plan, shall be submitted to the competent authority within six months of completion of the studies concerned."

The EudraCT Number must be included on all Clinical Trial applications within the Community and as needed on other documents relating to the trials (e.g. SUSAR reports, PIP).

Steps 1 and 2 below access the forms that must be submitted in order to obtain a EudraCT Number.

EudraCT Number Step 1
The first stage in the process is to obtain an authenticated security code. This security code will be sent to the e-mail address specified by you, the requestor, on the form, and is needed in order to complete the EudraCT Number request. The security code is valid for one EudraCT Number only and expires after 24 hours.
[Apply for Security Code](#)

EudraCT Number Step 2
This is the main EudraCT Number request that allows the requestor to obtain a EudraCT Number that will provide the unique reference for the Clinical Trial. The EudraCT number will be sent to the e-mail address specified by you, the requestor, on the form.
[Apply for EudraCT Number](#)

Create New Clinical Trial Application
Once you have the EudraCT Number and wish to enter Clinical Trial Application details please use this link.
[Click here to create a new Clinical Trial Application](#)

Load Saved Clinical Trial Application
If you have saved the Clinical Trial Application to disk and wish to load the details please use this link.
[Click here to load a saved Clinical Trial Application](#)

Download CT Amendment Form
If you would like an Amendment Form for your Application please use this link.
[Download CT Amendment Form](#)

Download CT End of Trial Form
If you would like an End of Trial Form for your Application please use this link.
[Download CT End of Trial Form](#)

[Return to EudraCT Home Page](#)

Figure 5: Welcome Page; EudraCT (Public Site); accessed on 15 December 2010

As first step “Apply for Security Code” should be chosen – on the next page (as shown in the screenshot below) you will only have to enter your name and e-mail address to which a security code will be sent that is valid 24 hours.

The screenshot shows a web form titled "Get Security Code" in a blue header. Below the header, there is a green text block providing instructions: "Fields marked with '*' must be completed. When you have completed the form, use the 'Get Security Code' button and an e-mail with a Security Code will be sent to the e-mail address entered. If you wish to cancel this application for a security code then use the 'Cancel' button which will return you to the main menu." Below this text are two input fields: "Requestor Name(*):" and "Requestor e-mail(*):". At the bottom right of the form area, there are two buttons: "Get Security Code" and "Cancel".

Get Security Code

Fields marked with '*' must be completed.
When you have completed the form, use the 'Get Security Code' button and an e-mail with a Security Code will be sent to the e-mail address entered.
If you wish to cancel this application for a security code then use the 'Cancel' button which will return you to the main menu.

Requestor Name(*):

Requestor e-mail(*):

Get Security Code **Cancel**

Figure 6: Get Security Code; EudraCT (Public Site); accessed on 15 December 2010

This code will be used for the “Get EudraCT Number” page, where in addition to the code some basic information will have to be inserted:

- Requestor name
- Requestor's organisation name, with town/city and country
- Sponsor's protocol code number
- E-mail address to which the EudraCT number shall be sent
- Determination, if the trial is connected with a Paediatric Investigation Plan (PIP)
- Determination, if there are third countries where the trial will be conducted
- Member States where the trial will be conducted

After completing this page, the EudraCT number will shortly be sent to the given e-mail address. Since this confirmation e-mail will be part of the submission package in several MS, it should be saved to the respective file.

Below, a screenshot of the “Get EudraCT Number” page is shown:

Get EudraCT Number

All fields marked with '*' must be completed in all requests.

If you are requesting the EudraCT number as an individual, then you may leave the 'Requestor's organisation name' empty. In this case the system will copy your 'Requestor's name' into the 'Requestor's organisation name' box. You must include your contact details in the 'Requestor's organisation town/city' and 'Requestor's organisation country' boxes.

When you have completed the form, use the 'Get EudraCT Number' button and an e-mail with a EudraCT Number will be sent to the e-mail address entered. If you want to cancel this application for a EudraCT number, use the 'Cancel' button which will take you back .

Requestor's organisation name:		
Requestor's organisation town/city(*):		
Requestor's organisation country(*):		
Sponsor's protocol code number(*):		
Requestor name(*):		
E-mail to which the EudraCT number will be sent(*):		
Enter the security code sent earlier(*):		
Is it anticipated that this EudraCT Number will be used for a Clinical Trial contained in a Paediatric Investigation Plan (PIP)? (*) ☐ Yes ☐ No		
Is it anticipated that this EudraCT Number will be used for a Clinical Trial conducted in a third country (outside of the EU/EEA)? (*) ☐ Yes ☐ No		
Please select the Member States where it is anticipated that the trial will be run:		
AUSTRIA: ☐ CYPRUS: ☐ ESTONIA: ☐ GERMANY: ☐ ICELAND: ☐ LATVIA: ☐ LUXEMBOURG: ☐ NORWAY: ☐ ROMANIA: ☐ SPAIN: ☐	BELGIUM: ☐ CZECH REPUBLIC: ☐ FINLAND: ☐ GREECE: ☐ IRELAND: ☐ LIECHTENSTEIN: ☐ MALTA: ☐ POLAND: ☐ SLOVAKIA: ☐ SWEDEN: ☐	BULGARIA: ☐ DENMARK: ☐ FRANCE: ☐ HUNGARY: ☐ ITALY: ☐ LITHUANIA: ☐ NETHERLANDS: ☐ PORTUGAL: ☐ SLOVENIA: ☐ UNITED KINGDOM: ☐
Get EudraCT Number Cancel		

Figure 7: Get EudraCt Number; EudraCT (Public Site); accessed on 15 December 2010

The next step is the creation of a new clinical trial application. When clicking on the respective link you will be asked to choose the responsible MS competent authority (only Germany has two of them, BfArM and PEI), and to enter the EudraCT number as you can see below:

Initial Required Information

This allows you to specify the initial required information for your Clinical Trial Application. Enter the EudraCT Number obtained for this protocol and the National Competent Authority, and use 'Continue', which will then take you to the main Clinical Trial Application menu. If you want to create a general set of data for a multi-state trial, you can leave the 'Authority' field blank at this stage.

National Competent Authority

EudraCT Number

[Continue](#) [Cancel](#)

Figure 8: Initial Required Information; EudraCT (Public Site); accessed on 15 December 2010

On the next pages, all details of the clinical trial, belonging to the following sections, will be asked:

A: Trial identification – for title, protocol code, version, date, and if it is a resubmission.

B: Sponsor identification – for the sponsor organisation and contact details. In case of a sponsor outside the EU, a legal representative must be designated and the information must be given by clicking on “add legal representative”. In addition, you will have to decide whether the status of the sponsor is commercial or non-commercial. Non-commercial sponsors are e.g. universities.

C: Applicant identification – for details of the applicants to either the competent authority or the Ethics Committee. The responsible person may be the same or different, and it may be the sponsor or an authorised person or organisation.

D: Information on the IMPs – for details to the investigational medicinal product(s) in this trial, as either test IMP(s) or comparator(s). If different strengths of an IMP will be investigated in the clinical trial, any strength should be regarded as separate IMP.

If the IMP has a manufacturing authorisation (MA), the name of the MA holder must be inserted together with trade name and MA number, which can be found in the summary of product characteristics – SmPC. If the IMP is modified in relation to its MA, the kind of modification must be mentioned, e.g. encapsulated. As dossier for products with a MA in a MS or ICH country the SmPC is sufficient, whereas for new products a full dossier must be submitted. For known products with some changes, or when a cross-reference to the application details of another applicant is authorised, a simplified dossier may be possible. For the decision whether a simplified IMPD may be used, the guidance document for the request to the competent authorities [7] gives detailed information in its Table 1.

If the IMP was already authorised previously, this information must be given as well as the decision whether the IMP had been the subject of scientific advice(s). In this case, a summary of the advice(s) should be provided with the submitted documents.

The pharmaceutical form and the route of administration must be chosen from drop-down lists, and the maximum duration of treatment of a subject with the maximal allowed dose must be given.

The next screens refer to the type of IMP, whether it is of chemical or biological origin, a cell therapy product, gene therapy product, radiopharmaceutical therapy product, or any other medicinal product.

With the link “add active substance”, the information about the active substance (AS) as part of the IMP and its concentration (unit, type and number) should be provided in a new window. If there is more than one AS in the IMP (combination products), all of them will have to be listed.

If there are several similar IMPs with only different concentrations of the active substance, they will have to be listed with an own section for each concentration. This may be done easily by copying the complete section and just changing the concentration units.

Non-IMPs such as challenge agents, concomitant medication, or rescue medication should not be listed in this section. For the decision whether a medicinal product in a trial will be regarded as IMP or non-IMP, EudraLex, Volume 10 – Clinical trials

guidelines Chapter V, Additional Information: Guidance on Investigational Medicinal Products (IMPs) and other Medicinal Products used in Clinical Trials [23], should be consulted. Currently, this guidance document will be found in EudraLex, Volume 10 – Clinical trials guidelines, Chapter III: Quality of the Investigational Medicinal Product. [20]

D.7. Information on the placebos – for the question, if there are placebos to be used. In case of answering “yes”, some information must be given after clicking on “add placebo”. Not only pharmaceutical form and route of administration must be provided, but also the information for which of the IMPs it is the placebo. If the placebo is not otherwise identical, except the lack of active substance, the major ingredients must be listed. Possibly, in case the placebo is not otherwise identical, an adequate dossier about its quality will have to be provided as well.

D.8. Site(s) where the qualified person certifies batch release – for the determination, who will be responsible for the final QP release of the IMPs before distribution to the investigational site(s) and/or the investigator(s). Only the final release of a QP (qualified person) will have to be documented, but for all manufacturing sites a valid manufacturing authorisation (alternatively a GMP certificate) must be submitted.

D.8.1 may be chosen for all IMPs that

- have a MA in the EU and
- are sourced from the EU market and
- are used in the trial without modification (e.g. not encapsulated) and
- are packed and labelled for local use only as per article 9.2 of the Directive 2005/28/EC [4]. In this article it is described, that a reconstitution prior to use or packaging by pharmacists or other authorized persons does not require authorisation, if these handlings are carried out in hospitals, health centres or clinics. However, this is only valid, if the IMP will be used solely in this institution.

For all other products and/or trial sites, respectively, a releasing site will have to be mentioned in section D.8.2 (as manufacturer, importer or both) by providing the manufacturing number.

E. General information on the trial – for the medical conditions and the classification code [to be looked up at MedDRA, a registered trademark of the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA)]. The main and the secondary objective(s) as well as the endpoint(s) should be listed. For the in- and exclusion criteria only the most important should be listed – on the one hand because only 5,000 characters can be inserted into the text field, on the other hand because any change to criteria that are listed here (in case of an amendment to the protocol), even if not important, will lead to the need of submitting a new application form to BfArM. For the decision, what the main criteria for the respective trial are, the principal investigator or any other responsible person may be asked. For the completion of the CTA form (and as well for the preparation of the German summary of the protocol), it would be helpful to decide on key in- and exclusion criteria while writing the protocol. They could be listed in the protocol synopsis, which is normally provided at the beginning of the document, and then copied into the application form without further request, which of the (sometimes more than 30 in- and/or exclusion criteria) are the most important.

The scope, type, and phase of the trial must be determined as well as the trial design (e.g. double-blind, randomised). If it is controlled, the type of comparator (placebo or other medicinal product) should be chosen, and the definition of the end of the trial should be provided.

Finally, yet importantly, the number of sites, the involvement of countries outside the EU, and the duration of the trial both in the concerned MS, and in all countries in case of multi-centre trials are inquired here.

F. Population of trial subjects – for any details of the trial participants, beginning with the age span, gender, the question whether the trial subjects are patients or healthy participants, and if vulnerable persons (e.g. pregnant or nursing women) are involved. Furthermore, the proposed number of trial participants should be given, and any special plan for treatment after the trial has ended.

G. Clinical trial sites/investigators in the member state concerned by this request – for the contact details of the principle investigator (in case of a multi-centre trial the coordinating investigator, and the principle investigators of all trial sites) should be given.

In the next subsections, the central technical facilities (providing services for all or most of the trial sites), and those concerned with the measurement of the main evaluation criteria must be listed, whereas local labs need not to be named (nevertheless, we had a BfArM query for one trial where not all local laboratories were listed). For these facilities the subcontracted duties will have to be stated – sometimes the information will be given in the protocol, but the contract or responsibility split list may also be a source for this information. Not only facilities in the concerned MS will have to be named, but also those in third countries, even if not situated in the EU.

Any other duties, such as CRO activities, data management, monitoring, or medical writing will have to be listed with the respective organisation in charge.

H. Competent authority / ethics committee in the member state concerned by this request – for the address of the involved CA and EC, the date of submission, and the authorisation status. For the submission to EC, the details of the CA will have to be given and vice versa.

I. Signature of the applicant in the member state – for the confirmation (on behalf of the sponsor in case of application through an authorised party) that the information in the application form is correct, that the trial will be conducted according to applicable principles, that it is reasonable to perform the trial, that SUSARs and safety reports will be submitted according to legal bases, and that the synopsis of the trial report will be submitted in due time.

Below, a screenshot of a main menu page with the possible options is shown:

Clinical Trial Application Menu

EudraCT Number :
Sponsor's Protocol Code Number :
National Competent Authority : Germany - BfArM
XML File Identifier : qS6zPXphs1gXMpmgrkOXxOE/Lbg=

NOTE: The system will 'timeout' after 30 minutes of inactivity. For this reason, and to avoid accidental data loss you must 'Save as XML' to your local computer (or other accessible drive) at the start of the session and regularly thereafter. This is because no data is stored by the EudraCT system except temporarily during the current session.
The 'Continue' button is used during data entry, this does NOT store your information on disk; it only preserves the information within your current application form.
On the screens accessed via the links below, ▲ indicates the item is part of the core data set as per the Annex to the Detailed Guidance ENTR/CT 5 describing the core data set.

The XML File Identifier is a checksum generated on the basis of the data that the XML file contains. It is used as an identifier to link the XML file and its related PDF and Validation Reports. The checksum is only recalculated on loading the XML, on request "Update XML File Identifier" and when the "Prepare Submission Package" command is used.

A. Trial Identification B. Sponsor Identification C. Applicant Identification D. Information on the IMPs D.7. Information on the Placebos	D.8. Site(s) where the qualified person certifies batch release E. General Information on the Trial F. Population of Trial Subjects G. Clinical Trial Sites/ Investigators in the Member State H. Ethics Committee/ National Competent Authority
---	--

Save as XML	Get Printable Copy	Validate XML	Compare XML	Prepare Submission Package	Section J	Update XML File Identifier	Welcome Page
----------------	--------------------------	-----------------	----------------	----------------------------------	-----------	----------------------------------	-----------------

Figure 9: Main Menu Page; EudraCT (Public Site); accessed on 15 December 2010

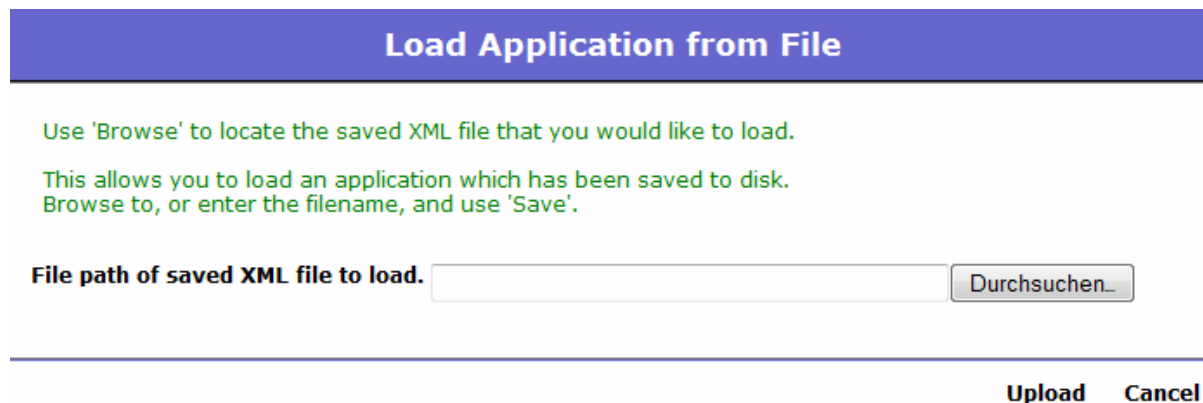
Important information to the completion of the form:

With “edit” missing information can be added or inserted details can be corrected – with “delete” the content will be deleted **immediately** without any further request (take care!).

The system has 'timeout' after 30 minutes of inactivity. To avoid the loss of data, the application form must be saved to the own computer or any other accessible drive by clicking on “Save as XML”, which should be repeated regularly in the course of completing the form. In the EudraCT system, only the data of the current session will be saved. The name of the file will be FullData.xml as given by EudraCT – it is useful

to rename the file associated to the respective trial. Otherwise it could happen, that an already saved xml file would be replaced accidentally – which means the loss of the complete data of the formerly completed application form.

Once you have ended to complete the form and closed the file, you may open it again by choosing “Load Saved Clinical Trial Application” which will lead you to the following page, where you can browse your files and upload the required xml file:



Load Application from File

Use 'Browse' to locate the saved XML file that you would like to load.

This allows you to load an application which has been saved to disk. Browse to, or enter the filename, and use 'Save'.

File path of saved XML file to load.

Upload Cancel

Figure 10: Load Application from File; EudraCT (Public Site); accessed on 15 December 2010

A click on “Next” in a multi-sided section will bring you to the next page; with “Cancel” you will either return to the first page of that section or to the main menu, depending on the section, without saving any changes. The last page of each section has the options “Continue” to return to the main menu and “Cancel” to close this section without any entries or changes. A click on “Application Menu Page” will always lead to the main menu.

In most sections, each tick box must be ticked, mostly “yes” or “no”. This is a new option in this current version 7.0 (the tick fields in the former version could be left open without any validation failures), and shall probably make sure that no decision will be just forgotten. Nevertheless, in some sections, this is no logical procedure. For example in section F.1 Age span: If you have ticked “no” to F.1.1 “Less than 18 years” you will have to answer all questions F.1.1.1 to F.1.1.6, although the instruction says, “If **yes**, specify”. Otherwise, the validation report will list these missing ticks of “no” as mistakes. The concrete wording in the validation report is: “If F.1.1 is “Yes” all sub-questions should be answered and at least one of F.1.1.1 to F.1.1.6 should be “Yes”.

If F.1.1 is "No" then sub-questions F.1.1.1 to F.1.1.6 should be all answered "No". But if you try to complete the form as requested, you will always get the same comment. In contrast, if you tick all sub-questions with "no", regardless of the instruction, this section will be regarded as correct. This is also the fact in some other sections, so the next version of the EudraCT application form will hopefully be revised concerning these inconsistencies.

Sometimes, a text field may be left open, e.g. if question E.8.2.3 "If controlled specify the comparator – Other" is ticked "no", no answer should be given in the field below. In contrast, the text field to question E.8.8 "Definition of the end of trial" should be at least filled with "n/a", otherwise the validation report will list a mistake in that section. These fields are called "mandatory" and must at least be filled with "n/a" or "not applicable".

The above-mentioned validation report can be created by clicking on "Validate XML" in the main menu.

Below, a screenshot of the first section of a validation report with deficiencies is shown:

Validate Application Results

EudraCT Number :
Sponsor's Protocol Code Number :
National Competent Authority : Germany - BfArM
XML File Identifier : qS6zPXphs1gXMpmgrkOXxOE/Lbg=
Validation Date and Time : 2011-02-09 18:48:25 GMT

This is the list of inconsistencies found in your application. Please go back and correct the inconsistencies before submission.

Expand All Collapse All

Sections

- ▶ B. Sponsor Identification - ID: SP1
- ▶ D. IMP Identification Index - ID: PR1
- ▶ D. IMP Identification Index - ID: PR2
- ▶ E. General Information on the Trial
- ▶ F. Population of Trial Subjects
- ▶ G. Clinical Trial Sites/ Investigators - ID: IN1
- ▶ G. Clinical Trial Sites/ Investigators - ID: CTF1
- ▶ G. Clinical Trial Sites/ Investigators - ID: TMF1

Total	30 Failed
--------------	------------------

Figure 11: Validate Application Results with Failures; EudraCT (Public Site); accessed on 27 December 2010

As an example, the failures in section E. "General Information on the Trial" are shown below:

E. General Information on the Trial		
FIELD	RULE ID	DESCRIPTION
E.6.1 Diagnosis	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.2 Prophylaxis	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.3 Therapy	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.4 Safety	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.9 Dose response	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.10 Pharmacogenetic	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.11 Pharmacogenomic	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.12 Pharmacoeconomic	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.6.13 Others	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.7.2 Therapeutic exploratory (Phase II)	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.7.3 Therapeutic confirmatory (Phase III)	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.7.4 Therapeutic use (Phase IV)	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.8.8 Definition of the end of the trial and justification in the case where it is not the last visit of the last subject undergoing the trial, if not provided in the protocol	FEAT6.2.4	This field is a mandatory field and must be filled in.
E.8.9.1 In the MS concerned -years	FEAT6.2.4	This field is a mandatory field and must be filled in.

Figure 12: Failures in Section E; EudraCT (Public Site); accessed on 27 December 2010

For a completed application form without any more failures, you will get a validation report as shown below:

Validate Application Results

EudraCT Number :
Sponsor's Protocol Code Number :
National Competent Authority : Germany - BfArM
XML File Identifier : g6dHf6wOLdV2/JdeJ9ZAOpLSQ8=
Validation Date and Time : 2011-02-09 18:52:56 GMT

This is the list of inconsistencies found in your application. Please go back and correct the inconsistencies before submission.

Expand All Collapse All

Sections

Total	0 Failed
-------	----------

The Clinical Trial Application (CTA) has passed all validation rules.

[Save As PDF](#) [Return to Application Menu](#)

Figure 13: Validate Application Results without Failures; EudraCT (Public Site); accessed on 28 December 2010

All validation rules may be found on the EudraCT website in the file “EudraCT Validation Rules” [17].

When all failures have been solved and the application form is ready for submission, the link “Prepare Submission Package” on the main menu page should be chosen – a complete set of documents for either BfArM or EC submission will be prepared which contains of the pdf file, xml file, and the validation report in a zip file.

Investigational Medicinal Product Dossier – IMPD

The most important part of the application documents to BfArM, apart from the protocol, is the dossier of the investigational product in the proposed trial. In Directive 2001/20/EC, Article 2(d), IMPs are defined as “a pharmaceutical form of an active substance or placebo being tested or used as a reference in a clinical trial, including products already with a marketing authorisation but used or assembled (formulated or packaged) in a way different from the authorised form, or when used for an unauthorised indication, or when used to gain further information about the authorised form.” [11]

Given this definition, reference products used as comparators should also be considered as IMPs, which includes placebos as well (but only quality data will be required here).

The sponsor should always provide this documentation, and normally no review from our side will be required. Nevertheless, if the principal investigator has profound knowledge of the IMP(s), he/she may be asked to review certain sections in the documents, and to give his/her input, if possible.

If the use of the IMP had already been approved for a previously submitted clinical trial with the same sponsor, and no alterations were made, a full reference to that documentation will be possible. If there are further results to this IMP, which were not subject of the previous application, a simplified IMPD with reference to the identical documents may be submitted by clearly demonstrating all new data.

In EudraLex – Volume 10, Chapter II: “Monitoring and Pharmacovigilance” the “Guideline on the requirements to the chemical and pharmaceutical quality documentation concerning investigational medicinal products in clinical trials” [25] gives detailed information on the requirements of the documentation in an IMP dossier to be submitted in a clinical trial application. Consequently, just a brief overview should be given here. Whenever appropriate, the applicant should provide the information in the CTD (Common Technical Document) format as given in EudraLex – Volume 2B, “Presentation and content of the dossier” [18], which facilitates the implementation of further knowledge into the required format for the application for marketing authorisation.

The aim of the details given in the IMPD is only for application purposes regarding a proposed clinical trial. Therefore, there is no need to provide the same amount of information as for an application for marketing authorisation. Sufficient information about the drug supplies used in the trial, and about the safety for the included trial participants should be given, and the content should be regarded in connection with the trial protocol, and other associated documents, such as the IB.

The table of contents should contain of data to quality, manufacture, and control of the IMP, non-clinical pharmacology and toxicology data, data of previous clinical trials and

other human experience, an overall risk and benefit assessment, and should preferably follow these topics in the CTD format:

- Introduction
- Chemical Pharmaceutical Data
 - Drug Substance
 - o General Information
 - o Manufacture
 - o Characterisation
 - o Control of Drug Substance
 - o Reference Standards or Materials
 - o Container Closure System
 - o Stability
 - Medicinal Product
 - o Description and Composition of the Medicinal Product
 - o Pharmaceutical Development
 - o Manufacture
 - o Control of Excipients
 - o Control of Medicinal Product
 - o Reference Standards or Materials
 - o Container Closure System
 - o Stability
- Appendices
 - Facilities and Equipment
 - Adventitious Agents Safety Evaluation
 - Novel Excipients
 - Solvents for Reconstitution and Diluents
- Non-Clinical Pharmacology, Pharmacokinetics and Toxicology

- Test Materials used in Toxicity Studies
- Integrated Assessment of the Data Package
- List of Studies Conducted & References
- GLP statement and Bioanalytical Methods
- Clinical Data
 - Clinical Pharmacology
 - Clinical Pharmacokinetics
 - Human Exposure
- Benefits and Risks Assessment

For IMPs of biological origin, a TSE (Transmissible Spongiform Encephalopathy) certificate, to prove the safety of the trial participants in this regard, may be required for the application package as well.

Sometimes, the sponsor will also provide SUSAR line listings with the IMP documents.

Labelling

According to § 5 GCP Ordinance [41], a draft version of the proposed labelling for the IMP(s) must be submitted. The labelling should comply with the principles laid down in Directive 2003/94/EC [3] and the 3rd Notification of the German competent authorities [1]. Additionally, Table 1 of the GMP Guideline [19] gives a detailed overview of the documentation required for the labels of the investigational product(s). The following aspects must be considered and missing data should be justified:

- a) The name, address and telephone number of the sponsor, contract research organisation or investigator (i.e. the main contact for information on the product, clinical trial and emergency unblinding)
- b) The pharmaceutical dosage form, route of administration, quantity of dosage units, and in the case of open trials, the name/identifier and strength/potency
- c) The batch and/or code number (in German: *Chargen-Bezeichnung*) to identify the contents and packaging operation, the abbreviation should be "Ch.-B."

- d) A trial reference code and the EudraCT number, allowing identification of the trial, trial site, investigator and sponsor, if not given elsewhere (e.g. PIS/PIC)
- e) The trial participant identification number/treatment number and, where relevant, the visit number, if not given in an accompanying document
- f) The name of the investigator – if not included in a) or d)
- g) Directions for use (reference may be made to a leaflet or other explanatory document intended for the trial participant or person administering the product)
- h) The advice “for clinical trial use only” or similar wording
- i) The storage conditions, if applicable
- j) The period of use [use-by date (“*verwendbar bis*”), expiry date or re-test date as applicable], in month/year format and in a manner that avoids any ambiguity
- k) The advice “keep out of reach of children” except when the product is for use in trials where the product is not taken home by the participants
- l) Special precautions for the disposal of unused IMP(s) or other special precautions to avoid danger to the health of non-affected persons and the environment, and indications for their return (this is a specific requirement mentioned in BfArM’s 3rd notification)

As a result, in Germany on both the primary and secondary packaging, sections a) to l) must be given. An exception will be made for section a) where the address and telephone number may appear in a leaflet or card, which provides these details, and the trial participant has been instructed to keep this document with him at all times.

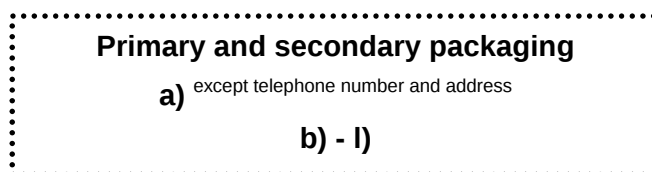


Figure 14: Labeltext “Primary and secondary packaging”

For the primary packaging, where primary and secondary packaging remain together all the time, and the outer packaging contains of the information of sections a) to l) the following sections must be printed: a) except address and telephone number, b) except the route of administration for oral solid dose forms, c), d), and e).

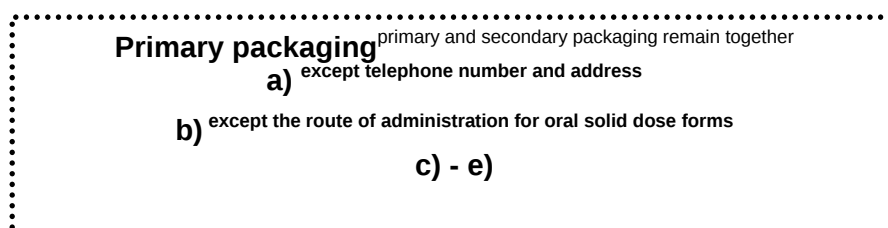


Figure 15: Labeltext "Primary packaging if primary / secondary packaging remain together"

If the primary packaging is a blister or small unit, and the outer packaging contains of the information of sections a) to l), the list may be shortened to a) except address and telephone number, b) except the route of administration for oral solid dose forms, and pharmaceutical dosage form, and quantity of dosage units, c), d), and e).

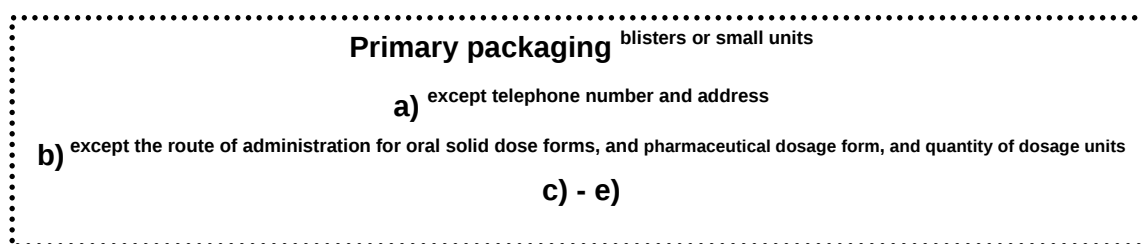


Figure 16: Labeltext "Primary packaging for blisters or small units"

Normally, the labels will be provided by the sponsor, but it is also in the responsibility of the RAM to check the correctness of the documents regarding the required information.

As verification that some information will be provided in other documents, the respective leaflet or participation card should be added to the application package, and an explanation should be given in the cover letter or an additional document.

A German template of a possible label will be added in Annex 11.

Manufacturing and Import Licences

According to the requirements of the already mentioned directives, guidelines and ordinances, especially EudraLex – Volume 4, EU Guidelines to Good Manufacturing Practice, Annex 13 [19], the manufacturing licences of all participating manufacturers, stating the scope (all processes of manufacturing inclusive dividing up, packaging, and presentation) and validity of the authorisation, must be provided for the BfArM review as proof of GMP compliance.

In case of a manufacturer situated outside the ICH region, an import licence and a certification of GMP compliance by the qualified person responsible for the IMP in the EU Member State must be submitted. Nevertheless, for some countries a “Mutual Recognition Agreement” [34] may be in place, so that the manufacturing licence remains valid and no re-control will be necessary. This is the fact for Australia, Canada, Switzerland and New Zealand [33].

No GMP documentation is needed for IMPs with a marketing authorisation in the EU or an ICH country, given that they are not modified (e.g. over-encapsulated).

If you submit more than one manufacturing licence, information in the cover letter should be added, who of these manufacturers will be responsible for the batch release. Although this information is already given in the EudraCT application form in section D.8. “Site(s) where the qualified person certifies batch release”, we had queries to that question in comparable situations.

2.5 Deficiencies

After receipt of the application, the EC and BfArM have 10 days to check the documents formally, and to ask for updated documents. As pointed out before, the applicant has 14 days to correct any formal deficiencies. After a formal complete submission, there is 30 days time for the review of the submission package.

In general, all requirements mentioned in the GCP Ordinance [41] as mandatory will cause deficiency letters, if missing. Nevertheless, many issues will only be detected in the course of various applications and growing experience, because in a single

application (hopefully) only a few mistakes will be made. It is therefore recommendable to set up a database with past queries of the EC and BfArM, to avoid repeating the same mistakes.

For all documents required by the EC to answer their deficiency letters, the number of copies is the same as in the submission package (ninefold). For BfArM the number depends on the departments, which ask for revised documentation. At least two paper copies are required (in the case only one department, e.g. quality, has concerns, then one copy goes to the respective department and the other one to the project manager in charge), but in no case more than four.

For both EC and BfArM, an additional CD ROM with the files as pdf (and xml, if changes to the application form occurred) must be provided.

2.5.1 Ethics Committee

Formal Deficiencies

The formal requirements range from the correct number of paper copies, over the signature pages of both sponsor representative and principal investigator, to the insurance documents. After receiving a letter of formal deficiency, it will be helpful to add the query to a checklist to avoid that mistake in the future, which may be just a clarification for the EC members in the cover letter.

Most of the formal deficiencies are evadable by an accurate preparation of the submission package, and a final review through a second person. Not only once, we have detected a missing document in this review, which would otherwise have caused a deficiency letter.

Possible formal faults would be:

- Missing information in the cover letter according to § 7(2)2 GCP Ordinance [41]
- Wrong version numbers and dates of documents listed in the cover letter
- Protocol signature pages are missing

- Cover letter, module 2, EC checklist and/or CTA form have not been signed or only copies of the signature pages are provided (these documents must be sent with one original signature and the remaining as copies)
- Insurance documents are incomplete, e.g. the “General Insurance Conditions” (*Allgemeine Versicherungsbedingungen*) or specific conditions mentioned in the confirmation of insurance are missing
- CVs, GCP certificates or statements of one or more investigators are missing
- EudraCT number is missing on relevant documents (e.g. protocol, PIS/PIC)
- Responsibility split list is missing in the information about funding of the trial
- CD ROM with the submitted documents as pdf files is missing

Formal deficiencies should be avoided by all means, because the review period will not begin until the queries have been answered. Nevertheless, sometimes it is not possible to submit completely, because the EC may have decided to change their requirements without notifying the applicants beforehand. In this case, the internal checklist should be amended accordingly to leastwise avoid the “new” requirement in the future. Unfortunately, we had such a situation in the beginning of 2010, when we submitted four trials at a time and consequently received four letters of formal deficiencies to the same issue – that sadly deteriorated our internal statistics on successful submissions.

Contentual Deficiencies

As to our experience, the contentual deficiencies of the EC refer mainly to the participant information sheet/informed consent form (PIS/PIC).

Since we mainly deal with clinical trials in the field of diabetes, some of these deficiencies refer to the specific conditions, and in- and exclusion criteria of diabetic patients, but they might easily be extrapolated to other medical conditions.

Possible contentual faults of the **PIS/PIC** could be:

- The wording of the PIS/PIC should be in lay terms – for example the following terms were classified as too hard to understand:
 - orally administered (*oral verabreicht*)
 - menopausal condition (*menopausaler Status*)
 - bronchospasm (*Bronchospasmus*)
 - angioedema (*Angioödem*)
 - coding (*codieren*)
 - genome (*Genom*)
 - reversible (*reversibel*)
- If medical devices are handed out to the participants (here: glucometers), their use must be trained through the investigators
- Diaries to be used in the trial, must be explained and demonstrated
- If a trial consists of several groups, each group should be given an own PIS/PIC (i.e. no information will be given to one group, which is only of interest for the other)
- The complete address of the sponsor must be provided in the PIS
- In case of taking blood samples, information to the risk must be provided, e.g. injury of nerves, bruises, infection
- Risks and adverse effects must be explained clearly
- For genetic investigation, a separate PIS/PIC must be created
- The PIS/PIC must be given to foreign participants in their mother tongue
 - it will be sufficient to confirm, that the participants will be provided with a certified translation and that this version is similar to the reviewed and approved German version
- All documents given to the participants must be reviewed by the EC – e.g. if a diary is mentioned in the protocol or in the PIS, the EC should receive it

- If participants must stay in bed for a longer period, anti-thrombosis stockings should be provided, the use of heparin should be considered, and participants with a history of deep leg thrombosis must be excluded from participation
- Treatment options other than the IMP should only be mentioned in trials with patients
- Information to data protection should be highlighted (e.g. surrounded by a frame)
- Insurance sums must be specified
- For information to possible adverse events also the measures for prevention or treatment should be indicated (e.g. intake of carbohydrates in case of hypoglycemia)
- The information to the IMP(s) should be adequate (not just briefly)
- For situations of pregnancy during the trial, the procedure for reporting (when, to whom, how long), and further handling should be defined
- Blood loss amounts in the course of the trial must be stated clearly, and an advice not to donate blood just before, during, and shortly after the trial should be included
- Measures of contraception should be defined clearly, also for male participants with regard to their female partners

For the **protocol**, deficiencies are rare regarding the EC review. Possible objections could be:

- Treatment guidelines for the specific medical condition should be regarded
- Publication clause should be in compliance with the Declaration of Helsinki
- Similar information in different sections should be congruent (here: the definition of hypoglycaemia was not the same in two different sections, in one section “as judged by the investigator” and in the other a specific definition was given)

- Inclusion criteria should contain of upper and lower limits (here: HbA1c level in diabetic patients)
- If the conditions of the trial are challenging (here: frequently changed treatment and several washout phases), participants should agree to inform their family doctor about the participation
- Individual withdrawal criteria should be defined decisively – just a reference to the section “Adverse Events” will not be sufficient

Other critical documents are the insurance confirmation and associated documents. As already stated in section 2.4.1 “Insurances”, not only the confirmation letters of the subject (and travel insurance, if applicable), are important, but also the additional documents, mainly the general conditions of the insurance, stating the overall responsibilities of the insured person and the insurer. The confirmation should therefore be reviewed thoroughly before submission, and missing or wrong information should be requested at the insurer. If relevant documents, information, and/or confirmations as stated above are missing, the EC will most likely detect that, and send a respective deficiency letter.

For other documents in the submission package, deficiencies are mostly rare. One objection could be that the German titles in the documents (e.g. PIS, German summary, and module 2) are not similar, another one that the in- and exclusion criteria in the PIS, or the amount of compensation in the advertisement do not correspond to the protocol.

2.5.2 BfArM

Formal Deficiencies

Possible formal deficiencies in the application to BfArM are in general similar to those in the package sent to the EC. Because there are some documents, which will only be sent to BfArM, such as the manufacturing licences or the draft versions of the proposed labelling, there may be some additional queries. However, in contrast to the EC, the clerks dealing with the submission at BfArM are often more pragmatic. Sometimes, they called us directly, if, for example, the CD ROM or one document was

missing although it was mentioned in the cover letter, and reminded us to send it. Because we did so within the 10 days of formal review period, we did not receive a respective deficiency letter. Not only once, they also took the opportunity to request additional information in their confirmation of formal correctness without delaying the start of the review period.

Most of the formal deficiencies refer to the **CTA**, which are, among others:

- All IMPs should be listed for which information will be gathered, also if used as comparator
- If treatment is defined only by active substance, the marketing authorisation number in the EU of one suitable marketed medicinal product should be provided, and the respective SmPC should be submitted
- If the IMP is modified in relation to its marketing authorisation, at least a simplified IMPD must be provided; the SmPC will not be sufficient
- Different strengths and dosage forms should each be mentioned as single IMP, even if used as several dilutions of one prepared mixture
- If question F.3.3.2 – “women of childbearing potential using contraception” is ticked “yes”, also question F.3.3.1 – “women of child bearing potential” must be ticked “yes”, because they are in principle also of childbearing potential, even if they use contraceptive measures
- In case of multi-centre trials only trials sites in the EU should be listed in section G.1 and G.2
- In section G.3 local laboratories for the trial sites of section G.1 and G.2 should be listed, and also central laboratories, even if not situated in the EU, if providing services for at least one of the EU sites
- In section G.4 all trial related duties should be specified, even if provided through organisations in non-EU countries
- In section D.8.2 only the manufacturer should be listed, who is responsible for batch release

- Name of active substance in section D.3.8 should be congruent to IMP (here: “Insulin human” should be changed into “Insulin lispro”)
- In section D.3.4 the pharmaceutical form should be specified exactly (here: “Powder for solution for injection” should be changed into “Powder and solvent for solution for injection”)

Contentual Deficiencies

The focus of the BfArM review lies more on the medical and scientific aspects of protocol and IMP, rather than on ethical aspects of the trial. Therefore, the fields of contentual deficiencies vary from those of the EC. In the following, I will just refer to those documents, which may cause the main queries.

Possible contentual faults regarding the **protocol** could be:

- The chosen doses of the IMP should be justified, and the maximum dosage should be stated
- Dose escalations should be stopped, as soon as the MTD (maximum tolerable dose) will be reached; for this purpose the MID (minimum not tolerated dose) must be defined and determined as stopping criteria
- In- and exclusion criteria should consist of contraindications of all IMPs, this includes also the comparators
- Intervention criteria should be balanced carefully, defined exactly, and justified as appropriate, including lower and upper limits, for example with regard to
 - age groups (especially regarding concomitant medication and accompanying illnesses)
 - increase of laboratory values
 - homogeneity of groups (e.g. body mass index)
 - infection, allergies, and asthma
 - women of childbearing potential or postmenopausal women (details and definitions are given in ICH Topic M 3 [30])

- Documentation of medical history (here: accompanying illnesses in diabetics such as retinopathy and polyneuropathy) should not predate by more than 3 months
- Interaction of IMP and contraceptive medication (Pearl Index should be $< 1\%$) should be considered
- In early phase trials in- and exclusion criteria should be limited as appropriate, and close monitoring of participants, perhaps in-house where indicated, will be mandatory

Possible contentual faults of the **IMPD** could be:

- Impurities should be listed in detail, not only the total amount should be limited
- In phase II trials development and validation studies on possible interactions between the primary container and the contents should be presented
- Stability tests with the intended primary packaging for the marketed product should be performed
- Conditions for transportation of the IMP should be specified
- For planned multiple use of solvents (here: lyophilisate) the requirements for preservation should be taken into account
- Setting of the limits to potential genotoxic impurities should be based on "Question & Answers on the CHMP Guideline on the Limits of Genotoxic Impurities" [36]
- The germinal limit should be indicated prior to filtration
- IMPs without preservation should be reconstituted in germ-poor surrounding, and used as soon as possible
- High concentration levels of preservations should be justified (here: 2.0 mg/mL meta-cresol, instead of 1.5 mg/mL, which was regarded as sufficient by BfArM)
- The qualitative composition of a hard gelatine capsule should be indicated

- Data to toxicokinetics should be submitted in tabular form for traceability
- In case of significant light absorption, the IMP should be tested for phototoxicity and participants should be informed about possible risks

Possible contentual faults concerning the **manufacturing licences** could be:

- All manufacturers/importers must be nominated according their activities, and the respective licences should be added
- The manufacturing licence must be issued by the competent authority of the respective state, should be valid, and refer to all activities needed for the purpose
- The details regarding manufacturers and importers should be consistent in all documents
- If more than one manufacturing licence is submitted, the role of each manufacturer should be defined clearly, especially the responsible party for batch release (consistent to the application form)

Possible contentual faults concerning the **labels** could be:

- Instead of “*Haltbarkeitsdatum*” (best-before date) the term “*Verwendbar bis*” (expiry date) should be used
- Instead of “*Chargennummer*” (lot number) the term “*Ch.-B.*” (batch name) should be used
- Instead of “*Raumtemperatur*” (room temperature) the concrete temperature level should be stated
- The label should consist of the dosing instructions, or alternatively a reference to an accompanying document or the advice of the investigator should be inserted
- If participants take the medication home, the advice “Keep away from children” must be printed onto the labels; if medication will only admitted at the trial site, a respective confirmation should be given (e.g. in the cover letter)

- All draft labels should present a random number or any other identification code of the participant receiving this medication, otherwise a reference to an accompanying document must be given
- The amount of active substance must be stated correctly (here: sitagliptin phosphate 100 mg had to be replaced by sitagliptin 100 mg, because pursuant to the SmPC “Each film-coated tablet of JANUVIA contains 32.13, 64.25, or 128.5 mg of sitagliptin phosphate monohydrate, which is equivalent to 25, 50, or 100 mg, respectively, of free base...”

2.6 Notification according to § 67 AMG

According to § 67 German Drug Law (AMG) [22], the trial will have to be notified to the local and, in the case of clinical trials in humans, also to the responsible competent authority. The reason for this notification is to give these authorities the possibility to monitor the clinical trial sites regarding GCP and GMP compliance.

2.6.1 Notification to Local Authorities

Responsibilities

In North Rhine-Westphalia, there are two local authorities in place, on the one hand the *Inspektorat für klinische Prüfstellen in Nordrhein-Westfalen* (Inspectorate for clinical trial sites in North Rhine-Westphalia), and on the other hand the *Bezirksregierung* (Regional Council), both in Düsseldorf. As already described in the preface, we normally have to notify our activities to both of these authorities. Just in the case of multi-centre trials, when we are only acting as one of several trial sites without further obligations, or in case of an amendment to the investigational site (e.g. an additional investigator), the notification must only be sent to the Inspectorate.

According to § 12 GCP Ordinance, *Anzeige-, Dokumentations- und Mitteilungspflichten des Prüfers* (Investigators' duties to report, keep records and notify) [41], and § 67 German Drug Law, *Allgemeine Anzeigepflicht* (General notification requirement) [22], the investigator is responsible for the notifications to the local authorities.

The investigator(s) may delegate this duty to the sponsor (which is common practice in multi-centre trials) but nevertheless, this delegation must be documented. In our experience, for a trained CRO and/or trial site, it is easier to make these notifications on their own, because all documents will be kept in-house, and no tracking of notifications will be necessary. For example, we had not only one incident, where we had to insist on the necessity of notifying substantial amendments to the local authorities, which is explicitly determined in § 12(1)3 GCP Ordinance [41] and § 67(3)1 German Drug Law [22].

Furthermore, our SOPs specify the notification process together with the related documents as part of the trial investigator file (TIF), so we would have to ask the sponsor to forward the correspondence with Inspectorate and Regional Council. This is much more time-consuming than to keep the process at the site, especially, when there are templates for the notification form and the cover letters in place. These cover letters may be just a short reference to the attached notification form, and only one paper copy is required. If there is any further documentation needed, the authorities will contact the notifier directly.

Required Documents

The following information must be provided to the authorities in charge:

- Name, address, and professional title of the investigator obligated to report
- Designation of the competent federal authority and date when the authorisation was granted and, where applicable, dates of authorisations of subsequent amendments pursuant to § 10(1) GCP Ordinance [41]
- Designation and address of the competent Ethics Committee as defined in § 42(1)1 and 2 German Drug Law [22], date of its favourable opinion and, where applicable, dates of authorisations of subsequent amendments pursuant to § 10(1) GCP Ordinance [41]
- Designation and address of the Ethics Committee responsible for the investigator and the trial site, and date of its opinion in this regard (in case of multi-centre trials)

- EudraCT number of the trial
- Name or corporate name and address of the sponsor and, where applicable, his representative in the EU/EEA
- Name and address of the co-ordinating investigator, and of the principal investigator
- Name and address of involved laboratories/technical facilities
- Full title of the protocol including protocol code and objective
- Indication being tested
- Nature of the clinical trial and its conduct, including details of special characteristics of trial participants to which the special conditions as defined in § 41 German Drug Law [22] apply
- Intended commencement and prospective duration of the trial
- Name, strength, pharmaceutical form, medically active ingredients, and route of administration of the IMP
- Information as to whether the provisions of the laws relating to narcotics (*Betäubungsmittelrecht*), to genetic engineering (*Gentechnikrecht*), or radiation protection (*Strahlenschutzrecht*) must be observed, or whether it concerns somatic gene therapy or genetic diagnostics
- Quantity and nature of comparator products used in the trial

For this purpose, a specific form (*ZLG Formular*, with three appendices in case of multi-centre trials with several trial sites, other involved parties such as laboratories, and involved ECs) may be downloaded from the homepage of the *Zentralstelle der Länder für Gesundheitsschutz bei Arzneimitteln und Medizinprodukten – ZLG* (Central Authority of the Länder for Health Protection with regard to Medicinal Products and Medical Devices) (URL:<https://www.zlg.de/arzneimittel/dokumente.html>), where detailed information is provided in the download area, and where a list of all potentially involved authorities can be found.

The current version of the German template of the ZLG form will be provided in Annex 12.

After receipt of BfArM approval and positive opinion of EC(s), but prior to the start of the clinical trial, the notification must be sent to all affected local authorities.

Any amendment must be notified as well, and should be included in the first version of the form by ticking “*Änderungsanzeige*” (Notification of amendment) instead of “*Anmeldung*” (Announcement) in section 5 of the form, giving the reason for the amendment, and including the dates of the approval in section 7, and the positive opinion in section 8, respectively.

After the end of the clinical trial, this date (in the format MM/YYYY) will have to be inserted into the form in section 14. For mono-centre trials, the tick in section 5 should be made for “*Abmeldung der Gesamtstudie*” (Logoff of the whole trial), whereas in the case of multi-centre trials each of those trial sites mentioned in section 6 should be logged off, which have already finished their participation in the trial, and “*Abmeldung von Prüfstellen gemäß Ziffer 6*” (Logoff of trial sites according to number 6) should be ticked.

This notification must be executed within 90 days after the regular end of the trial, either for the trial site or for the complete trial. In case of premature terminations (suspensions or interruptions), the notification must be submitted within 15 days, stating the reasons for this decision.

2.6.2 Notification to BfArM

Responsibilities

According to § 67 German Drug Law, *Allgemeine Anzeigepflicht* (General notification requirement) [22] and § 12 GCP Ordinance, *Anzeige-, Dokumentations- und Mitteilungspflichten des Prüfers* (Investigators' duties to report, keep records and notify) [41], the investigator is also responsible for the notifications to the competent authority in charge. As outlined before, the investigator(s) may delegate this duty to the sponsor. Nevertheless, this delegation must be documented for notifications to the competent authority as well.

The approval of the competent authority is not sufficient to fulfil this obligation, but this is an independent administrative act, which must be executed before the start of the trial, prior to the implementation of substantial amendments and also in case of the notification of the end of the trial.

Required Documents

For notifying the trials to BfArM, it is accepted to just send a copy of the notification form sent to the local authority, together with a short cover letter stating the reason of the notification (start, substantial amendment, or end of the trial). For this purpose, we use the subject lines of our cover letter for the application for approval of a clinical trial (stating the EudraCT number, the protocol ID, and additionally the reference number of BfArM,), so that tracking of the documents will be easy for the person dealing with the case. As further facilitation of this process, no CD ROM with pdf files will be required.

3 Requirements During the Trial

3.1 Amendments

After the clinical trial has commenced, changes to the protocol, other documents, or procedures may be implemented according to article 10(a) of Directive 2001/20/EC [11]. With regard to regulatory requirements, the sponsor has to decide whether the amendment should be classified as substantial or not. Substantial amendments must be submitted to that EC (as “Information”) and/or competent authority (as “Notification”), which have reviewed these documents or procedures already within the initial application process. Therefore, in Germany a significant change for example to the IMPD will only have to be notified to the competent authority, whereas a change in the conditions of the subject’s insurance, or any information regarding the trial site or the investigators should only be sent to the concerned EC for the request for a positive opinion. A notification/information of the other party is not needed and not desired, anyway.

In contrast to the initial application, where no such rule exists, the information and notification, respectively, of substantial amendments should be submitted in parallel to EC and competent authority.

Both EC and BfArM will only accept amendments, once the initial application process had finished. Prior to approval, solely those changes are allowed that refer to formal or contentual deficiency letters.

3.1.1 Substantial Amendments

As outlined in § 10 GCP Ordinance [41], amendments are regarded as substantial and must be approved by the competent authority and/or the Ethics Committee prior to their implementation, if one of the following conditions is given:

- The amendment is likely to have an impact on the safety of the trial participants

- The amendment is likely to change the interpretation of the scientific documents where the trial bases on, or the scientific validity of the results may be affected
- The amendment is likely to change the management or the conduct of the trial
- The amendment is likely to affect the quality or safety of the IMP(s)
- In case of involvement of IMPs derived from or containing of genetically modified organisms, the amendment is likely to change the risk assessment for non-affected persons or the environment

Sometimes, it is not easy to decide about the substantiality of a change, so the sponsor may want to make use of legislative guidance. In the detailed guidance for the application to the competent authorities [7] a list of examples can be found to which extent an amendment will be regarded as substantial or not. Apart from that, the sponsor may ask BfArM for advice regarding a proposed amendment – this advice will be given without any fees, and might help to judge an amendment as substantial or non-substantial.

Typical substantial changes to the **protocol** would be:

- Change of main objective
- Change of primary or secondary endpoint subject to significant impact
- New toxicological or pharmacological data or new (significant) interpretation of existing data
- Change of the definition of the end of the trial, even if the trial has already ended
- Addition of trial arms or placebo groups
- Change of in- or exclusion criteria with significant impact
- Change of IMP / or dosing of IMP / or route of administration (e.g. from oral to subcutaneous)
- Reduction of monitoring frequency

Typical substantial changes to the **IB** would be:

- Changes to the safety information referred to in the annual safety report
- New toxicological or pharmacological data, or new interpretation of existing data significant for the investigator

Typical substantial changes to the **IMP** would be:

- Changes of manufacturing processes, test procedures, or manufacturing sites
- Changes of specifications of medicinal product or excipients
- Prolongation of shelf life

Typical substantial changes to **other documents** would be:

- Change of sponsor/legal representative
- Withdrawal or suspension of marketing authorisation of an IMP

In addition to preparing the changing documents, a specific notification form must be filled out, which gives a brief overview about the proposed amendment. This form may be downloaded from the EudraCT homepage by clicking on “Download CT Amendment Form”. This link leads to EudraLex – Volume 10, Clinical trials guidelines [20], where a pdf or word version of the form is provided in Chapter I: “Application and Application Form”.

The following sections will have to be completed, but some of them only, if applicable:

- Type of notification (i.e. concerned MS, and if EC or competent authority is affected)
- Trial identification (e.g. EudraCT number and protocol ID)
- Identification of the sponsor (and legal representative, if applicable) and the applicant (either for request to EC or to the competent authority)
- Substantial amendment identification (e.g. code number, version, affected documents, and reason)
- Description of each substantial amendment

- Change of clinical trial site(s)/investigator(s) in the concerned Member State
- Change of instructions to CA for feedback to sponsor (only for amendments to CA)
- List of appended documents
- Signature of the applicant (either for request to EC or CA)

It may be worthwhile to prepare a template of this form with the relevant contact details of the applicant, so that these details will not have to be inserted again every time. For the description of the amendment in section F of the form, it may be clearer to append a separate document, giving this information, rather than to include old and new wording right into the form. The designated space in the form, as given below, offers only little room in the columns.

Previous and new wording in track change modus	New wording	Comments/explanation/reasons for substantial amendment

Table 1: Section F of “Notification of a substantial amendment form”

A completion of the form may be administrable for short amendments with only few text passages, but for considerable changing of the wording the insertion of text in these columns, moreover in track change modus, would not really facilitate the tracking of the versions. By inquiry at EC and BfArM, we could clarify that a reference to an accompanying document is not only accepted, but also preferred.

The current version of this notification form will be attached as Annex 13.

Ethics Committee

The positive opinion of the responsible EC will be required for any amendment affecting the documents as outlined in § 7(2,3) GCP Ordinance [41]. These are those ones, which have already been reviewed by the EC within the application process for a positive opinion of the clinical trial.

Timelines and Formal Requirements

According to Article 10(a) of Directive 2001/20/EC [11], the Ethics Committee is required to give an opinion on a proposed substantial amendment within 35 days. In Germany, the EC will review the documents within 20 days (no matter, if mono- or multi-centre trials) – also for substantial amendments a confirmation of formal completeness will be provided.

It is in the responsibility of the sponsor to decide, whether an amendment is regarded as substantial, and which documents shall be provided for review. Therefore, the check of formal completeness extends in my understanding mainly to the presence of the agreements of sponsor and principal investigator to this amendment, and if all documents mentioned in the cover letter and/or the notification of amendment form are part of the submission package.

The documents should be sent tenfold as paper copies and on CD ROM as pdf files.

At present, no submission of a changed application form should be provided to our EC, because the primary function of this document is mainly to get a quick overview of the main issues and responsibilities of the trial in the initial application process. As a result, the newly sent form will not be reviewed again, and therefore should not be sent. In a recent telephone call, I have learned that the EC of the Medical Association North Rhine is working on a new SOP with regard to the application form. After that implementation it might be possible that the application form should be sent each time it has been updated.

BfArM

The authorisation of BfArM will be required for any amendment affecting the documents as outlined in § 7(2,4) GCP Ordinance [41]. These are those ones, comparable to the amendment procedure with the EC, which have already been reviewed by BfArM within the initial application process for an authorisation of the clinical trial.

Timelines and Formal Requirements

Although there is no deadline set in Directive 2001/20/EC [11], BfArM will also review the documents within 20 days for both mono- and multi-centre trials. In contrast to the EC, no letter of formal completeness will be sent. This may be subject to the fact that all our amendment submissions were considered to be valid, and in case of missing documents, such a letter would be sent to the applicant, but I have never received one.

The documents should be sent fourfold as paper copies and on CD ROM as pdf files. If there was an update to the application form, the updated xml file should be sent as well.

If BfArM has not raised grounds for non-acceptance within these 20 days, the proposed amendment may be implemented (implicit approval) – we have always received an approval, though.

3.1.2 Non-substantial Amendments

According to Directive 2001/20/EC [11], no notification to competent authorities or submission of information to the EC is obligatory in case of non-substantial amendments.

To decide, whether an amendment can be regarded as non-substantial, the list in the detailed guidance [7] may be of great help for the applicant. These issues, among others, can be considered as non-substantial:

- Changes to the identification of the trial (e.g. change of title, etc.), minor clarifications to the protocol or correction of typographical errors
- A minor increase in the duration of the trial (< 10 % of the overall time of the trial)
- An increase in duration of > 10 % of the overall time of the trial, provided that:
 - the exposure to treatment with the IMP is not extended,
 - the definition of the end of the trial is unchanged, and
 - monitoring arrangements are unchanged

- A change in the number of clinical trial participants per trial site, if the total number of participants in the Member State concerned is identical, or the increase/decrease is insignificant in view of the absolute number of participants
- A change in the number of clinical trial participants in the Member State concerned, if the total number of participants is identical or the increase/decrease is insignificant
- Additional safety monitoring, which is not part of an urgent safety measure
- Any change of persons other than the sponsor or his legal representative, or changes to the internal organisation of the sponsor, or of the persons to whom certain tasks have been delegated

Ethics Committee

In contrast to other ECs in Germany, the EC of the Medical Association North Rhine sticks conclusively to the requirements of the Directive 2001/20/EC [11], and the GCP Ordinance [41]. The submission of non-substantial amendments or any documents “for information only” will be rejected together with a definition of substantial amendments, and a statement that the Committee has not reviewed the documents. In order to clarify this position to the respective sponsor, any auditors or other interested parties, a not trial-related version of this statement will be added to the TIF and TMF of the respective trial in case of non-substantial amendments.

This procedure is not in line with the information provided at the homepage of the EC Working Group, where the following information in the Resolution 4 [38] (see attached as Annex 14) can be found:

- Non-substantial amendments should only be sent to the responsible EC
- Non-substantial amendments are not subject to submission but should be documented thoroughly, archived in the TIF/TMF, and may be reviewed by the EC at a later point of time

- Informed consent form, information sheets or other documents, which are planned to be given to the trial participants should always be sent to the EC, even in case they are non-substantial

BfArM

For BfArM this procedure is not as decisive as for the EC of the Medical Association North Rhine. Although according to section 107 of the guidance document [7] there is no obligation to submit non-substantial amendments, on the BfArM homepage you will find the information that all amendments should be submitted “for information”, which lead to an alteration of the initial application or the application form. Moreover, the classification of the examples to non-substantial amendments “[e.g. additional trial sites (*zusätzliche Prüfzentren*), change of the PI (*Wechsel des Hauptprüfers*), change of the name of the sponsor, or of the contact person (*Änderungen des Namens des Sponsors oder Änderung der Kontaktperson*)]” is not really unambiguous.

Overall, without going into details, it seems to be of some importance for BfArM to receive these notifications, even if in contrast to the guidance document [7] and Directive 2001/20/EC [11], and even if not entirely consistent according to their own website. Therefore, it may be defined by sponsor and supportive CRO to just send the information and to leave the decision up to BfArM, if they need or want the information or not. However, BfArM will not send a confirmation letter or receipt to non-substantial amendments.

Nevertheless, at least once, we have submitted a non-substantial amendment (as in the view of the sponsor), but BfArM told us in contrast that they consider this amendment to be substantial, that we should submit additional documents, and that we would have to wait for their approval.

3.1.3 Change of Investigational Site

In the course of a clinical trial, a change of the investigational site may become necessary, and should or should not be notified to EC and/or competent authority.

Ethics Committee

With the application documents to EC, some information to the feasibility of the trial site should be provided. If the trial site is regarded as eligible for conducting the respective clinical trial, any alteration of the given conditions may lead to a different opinion. The sponsor will have to decide, whether the change of the given background leads to a substantial amendment. This will always be the case, if the principal investigator in a mono-centre trial will change (and for the change of the coordinating investigator in multi-centre trials). But also for additional research physicians acting in the trial site according to Resolution 4 of the EC Working Group as of November 2005, last updated in June 2008, the positive opinion of the EC must be obtained: *“Änderungen von Prüfern in einer Prüfstelle: Die Änderung des Leiters der klinischen Prüfung, des Hauptprüfers oder des einzigen Prüfers in einer Prüfstelle oder die Meldung zusätzlicher Prüfer sind bewertungspflichtige, nachträgliche Änderungen (GCP-V § 3 Abs. 2c und § 10 Abs. 1 Ziffer 3)“*. [38]

Timelines and Formal Requirements

For the notification of additional investigators, the same requirements as for the initial application documents apply. Therefore, the current CV, a GCP certificate, and the confirmations (e.g. financial disclosures) as for the other investigators are necessary. After submission of an investigator amendment, a receipt of these documents, and confirmation of formal completeness will be sent as well.

As for all amendments, the documents should be sent tenfold as paper copies and electronically on CD ROM. The review time will be 20 days in the case of mono-centre trials (for multi-centre trials the review period will be extended to 30 days, because the leading EC will give its opinion only after consultation with the involved EC), and the investigator must not work within that trial prior to receipt of EC's positive opinion.

BfArM

Since BfArM is not responsible for the review of the eligibility of the trial site, no change of the local conditions (i.e. personnel, resources, facility, etc.), and only rarely

in the composition of the investigators must be notified to the competent authority. This is only the case if

- the principal investigator in a mono-centre trial will change
- the coordinating investigator in a multi-centre trial will change

If the investigational site does not longer take part in a multi-centre trial, this must be notified according to § 67 German Drug Law [22] (see above, section 2.6.2 “Notification to BfArM”), though.

Timelines and Formal Requirements

BfArM will review the notification of amendment within 20 days, both for mono- and multi-centre trials. The documents should be sent fourfold as paper copies, and electronically as pdf and xml file – due to the change in the application form – on CD ROM.

No confirmation of formal completeness will be sent, merely only the approval or possibly a letter stating contentual deficiencies of the amendment.

3.2 AE and SUSAR Reporting

According to § 13 GCP Ordinance [41], the sponsor is responsible for the documentation of any adverse event (AE), or serious adverse event (SAE), he was informed about by the investigator(s). The documentation should on request be passed on to the competent authority of any Member State of the EU (and of the EEA) participating in the clinical trial.

In case of a suspected unexpected serious adverse reaction (SUSAR), a notification of the Ethics Committees and the competent authorities of the participating countries (EU and EEA), and of the involved investigators must take place within 15 days after awareness. Content and format are described in the Detailed guidance on the collection, verification and presentation of adverse reaction reports arising from clinical trials on medicinal products for human use [9].

In case of death, or if the adverse reaction was life-threatening, this notification must happen immediately, but at least within 7 days (expedited reporting). Within further 8 days, any additionally available relevant information should be transferred to the involved parties.

If there are other circumstances that lead to an updated risk benefit assessment, the sponsor has to inform the involved competent authorities and ECs within 15 days. The examples given below should therefore be assessed by the sponsor regarding their relatedness and relevance. Related issues may be

- individual case reports of suspected adverse reactions (SARs) with unexpected outcome
- increased frequency of SARs that are regarded as clinically significant
- suspected unexpected serious adverse reactions (SUSARs) after a trial participant has already ended the participation
- circumstances in relation with the trial conduct, or the development of the investigational medicinal product (IMP), which could negatively affect the safety of the trial participants

All transferred data should be pseudonymised by using the identification code of the respective trial participant.

According to the guidance mentioned above and the *Verordnung über die elektronische Anzeige von Nebenwirkungen bei Arzneimitteln* (Ordinance on the electronically notification of adverse reactions of medicinal products) [42], the notification to the competent authorities should be made electronically (except the sponsor is no pharmaceutical company or delegate), and additionally in paper version, as long as the concerned authority does not inform the sponsor to the contrary.

In connection with AEs, SAEs, and SUSARs, the investigator has the obligation to inform the sponsor immediately, except the protocol allows a deferred reporting. The definition of AEs, SAEs, SARs or SUSARs, and the timelines for reporting in connection with the IMP should always be given in the protocol. After the immediate report, further detailed information should be provided as soon as possible. In case of

death of a trial participant, the investigator should provide the relevant information to the involved parties [leading EC (and participating ECs in case of multi-centre trials), competent authority, and sponsor].

Normally, SUSAR reporting will be done by the sponsor's pharmacovigilance department, or a contracted company, as it is required by law. According to § 63 German Drug Law, "any pharmaceutical company placing medicinal products (under the terms of § 2) on the market, shall appoint a qualified person who is resident in a member state of the European Union having the required expert knowledge and the reliability necessary for exercising his/her function (graduated plan officer) to set up and manage a pharmacovigilance system and to collect and evaluate notifications on medicinal product risks that have become known and co-ordinate the necessary measures." [22]

But nevertheless, several times we were requested to send SUSAR reports also to the EC, which should only be sent to BfArM (and other competent authorities, if applicable) according to the definition given above. In case of the EC of the Medical Association North Rhine, these reports were sent back with an accompanying letter, stating that the EC is no authority for pharmacovigilance. Only in case the SUSAR affects the clinical trial that was reviewed previously by the EC, and is therefore in its responsibility, it would have been accepted together with a statement of the sponsor to which extent the trial participants may be vitiated or endangered.

3.3 IB Update

According to the current Guideline for Good Clinical Practice [28], and the Commission Directive 2005/28/EC [4], the sponsor should review the IB annually and revise it if necessary, or in case relevant new information becomes available during the conduct of a clinical trial. If the new information is of relevance for the classification of SUSARs, the IB or the new information should be sent to the investigators for information (as so called "Dear Investigator Letter").

If the update is in fact regarded as a substantial amendment, it must also be transferred to the involved competent authority(ies), and EC(s) for review and

approval. For this purpose, the amendment notification form from EudraCT should also be used. In section E (Substantial Amendment Identification) the “Sponsor’s substantial amendment code number, version, date for the clinical trial concerned” should be filled in with the date and version of the updated IB, and the type of amendment should be declared as “Amendment to other documents appended to the initial application form”. As “Reasons for the substantial amendment” E.3.7 should be ticked “yes” and “Update of the Investigator’s Brochure (plus the name of the respective IMP)” should be inserted.

However, the update of an IB does not always have to be regarded as substantial amendment, and not in any case it should be submitted to the authorities or to the EC(s). Nevertheless, we experienced in contrast that most IB updates were submitted to BfArM regularly, and very often also to the EC. Some sponsors have standard operating procedures (SOPs) in place that require such an approach, even if not required by the authorities and the EC. In case of the EC of the Medical Association North Rhine, only substantial IB amendments will be accepted – not only “for information”.

3.4 Yearly Report

According to ICH-GCP, “The investigator should submit written summaries of the trial status to the IRB/IEC annually, or more frequently, if requested by the IRB/IEC.” [28]

In Germany, this clause is given in § 13(6) GCP Ordinance [41]: “Der Sponsor hat der zuständigen Ethik-Kommission, der zuständigen Bundesoberbehörde und den zuständigen Behörden anderer Mitgliedstaaten der Europäischen Union und anderer Vertragsstaaten des Abkommens über den Europäischen Wirtschaftsraum, in deren Hoheitsgebiet die klinische Prüfung durchgeführt wird, während der Dauer der Prüfung einmal jährlich oder auf Verlangen eine Liste aller während der Prüfung aufgetretenen Verdachtsfälle schwerwiegender Nebenwirkungen sowie einen Bericht über die Sicherheit der betroffenen Personen vorzulegen.“

For the submission of the annual safety report (ASR), which should include a list of SUSARs that have occurred during the reported period, the amendment form will not

have to be used in any circumstance. Just if the report's data require a change of other documents, e.g. the protocol or the IB, and this change is regarded as substantial, an amendment should be issued and submitted (Article 17(2) of Directive 2001/20/EC) [11]. The Detailed guidance on the collection, verification and presentation of adverse reaction reports arising from clinical trials on medicinal products for human use [9], including information to content and format of annual safety reports, can be found on the website of the European Commission. According to this guidance, the ASR should have three parts:

- Analysis of the subjects' safety in the concerned clinical trial
- A line listing of all suspected serious adverse reactions (including all SUSARs) that occurred in the concerned trial, including also serious adverse reactions from third countries
- An aggregate summary tabulation of suspected serious adverse reactions that occurred in the concerned trial

4 End of Trial Notification

4.1 Responsibilities

According to the European guidelines and the GCP Ordinance § 13(8) [41], the sponsor has to notify the interruption, the premature termination, or the regular end of the clinical trial to the competent and local authorities, and to the responsible EC(s).

4.2 Timelines and Formal Requirements

An interruption or a premature termination must be notified within 15 days by giving the reasons for the interruption or termination.

The regular end of the trial must be notified within 90 days – the definition for the end of the clinical trial should always be given in the protocol, otherwise the last visit of the last participant will by definition be regarded as the end of the trial.

Whereas only the end of the trial in all concerned countries (EU Member States or third countries) must be notified to BfArM and EC, the local authorities Inspectorate and Regional Council must be informed about the end of the trial in the trial site, which they have to supervise. In case of global clinical trials, a trial site in a third country may just begin with recruitment due to local problems or requirements, whereas the German site may have already come to the end of the trial. If this is the case, the local authority should be informed within 90 days about this trial termination.

It is advisable to wait with the notification until the deadline has nearly expired because sometimes additional activities may have to be performed – provided that they are allowed per protocol. This would be impossible or at least difficult, if the trial has already been notified as terminated.

4.3 Required Documents

BfArM and EC

In case of an interruption, the “Substantial amendment notification form” from EudraCT [15] should be used, and information should be provided in section E.4 “Information on temporary halt of trial”. The restart of the trial will definitely be regarded as substantial amendment, and must not take place prior to approval through BfArM and positive opinion of the EC.

In case of a premature termination, the “Declaration of the end of trial form” from EudraCT [15] should be used by ticking “yes” to section D.2 “Is it an early termination?”, stating the reasons for the termination, and the consequences for the trial participants in sections D.2.1 to D.2.2.3.

If necessary to ensure the participants’ well-being, safety measures may be implemented prior to the notification both in case of interruption, and in case of premature termination.

The regular end of the trial will also be notified by using the “Declaration of the end of trial form” but in contrast to a premature termination, the date for the end of the trial will be given in section D.1 by ticking “no” to D.2.

The current version of the “Declaration of the end of trial form” will be provided as Annex 15.

For BfArM, the notification of the end of the trial should also take place according to § 67 German Drug Law [22]. For this purpose, again the ZLG form (see chapter 2.6.2) may be copied, and provided together with a short covering letter. This notification informs BfArM about the termination in single trial sites apart from the notification of the end of the whole trial.

Local authorities

For the notification to the local authorities, the already formerly mentioned ZLG form should be used once again by ticking “*Abmeldung der Gesamtstudie*” (Logoff of the

complete trial) or “*Abmeldung von Prüfstellen*” (Logoff of trial sites), whatever is applicable, in section 5 “*Grund der Anzeige*” (Reason for notification), and adding the date (month and year) in section 14.

Because the *ZLG* form was filled out at least for the notification of the start of the trial, it may be used once again with all inserted information (except information to any amendment in section 5 – this should be deleted to make clear that no amendment will be notified but the end of the trial).

5 Report

In § 13 GCP Ordinance, *Dokumentations- und Mitteilungspflichten des Sponsors* (Investigators' duties to keep records and notify) [41] it is defined that one year after the end of the trial a summary of the clinical trial report (in this context mostly called "synopsis") must be submitted to competent authority and responsible EC. This report should follow the requirements given in ICH Topic E3 – Note for Guidance on structure and content of clinical study reports [26].

The synopsis should therefore give information to following topics:

- Name of sponsor and company
- Name of finished product
- Name of active ingredient
- Title of the study
- Investigators
- Study centre(s)
- Publication (reference)
- Studied period (years)
 - (date of first enrolment)
 - (date of last completed)
- Phase of development
- Objectives
- Methodology
- Number of patients (planned and analysed)
- Diagnosis and main criteria for inclusion
- Test product, dose and mode of administration, batch number
- Duration of treatment

- Reference therapy, dose and mode of administration, batch number
- Criteria for evaluation
 - Efficacy
 - Safety
- Statistical methods
- Summary – Conclusions
 - Efficacy Results
 - Safety Results
 - Conclusion
- Date of the report

For future reports, the format will change and a DSUR (Development Safety Update Report) shall be written. The CIOMS (Council for International Organizations of Medical Sciences) Working Group have announced the publication of “The Development Safety Update Report (DSUR): Harmonizing the Format and Content for Periodic Safety Reporting During Clinical Trials.” [39] in 2006 and the respective ICH Topic E2F, Development Safety Update Report [29] is currently in step 4 of implementation. The goal of this approach is a global harmonisation of the currently existing different formats: “The Development Safety Update Report (DSUR) ... is intended to be a common standard for periodic reporting on drugs under development (including marketed drugs that are under further study) among the ICH regions.” [29]. The guideline shall come into operation in September 2011.

5.1 Timelines and Formal Requirements

The synopsis should be sent as one paper copy and as pdf file on CD ROM to both BfArM and EC together with a short covering letter stating the respective reference number, the EudraCT number, and the trial ID.

In exceptional circumstances, it is possible to ask for a time extension for the submission of the report. This may for example be the case, if the laboratories had

problems with analysing the samples. A short letter stating the instances will allow BfArM and EC to check whether they could agree on such an extension of the deadline. The responsible RA manager should remind the involved parties not to wait too long for this request, but to send it in due time.

6 Helpers in Daily Work

There are many duties to perform in a regulatory department prior to the application and during the course of a clinical trial, and many timelines must be adhered to. Therefore, it is advisable to create templates of all necessary documents and cover letters, to design checklists, and to have a tool in place that allows following up on all timelines.

6.1 List of Documents

In our database, we have a “list of available documents” related to regulatory affairs that may be needed in the course of the trial. On the one hand, these are partly completed cover letters and templates of the relevant forms to the different authorities (BfArM, Inspectorate, and Regional Council) and to the EC, and on the other hand, these are SOPs and checklists that may be used for information and help.

For all documents, we have inserted a comment, for what purpose they will be needed, and where they will be found. The comments may help the study teams that are involved in the trials, to have a quick overlook on what may be needed for the application and where they get further help.

Some of the documents are centrally stored in the document management system (DMS), have a version number, and will be tracked; many others are stored only electronically in the regulatory affairs folder. This facilitates for example the update of the cover letters in case of deficiencies, when an answer could easily be included into the template as standard without tedious update of the document in the DMS.

For documents, which are stored in the DMS, and have a document ID, a hyperlink is inserted in the list, so that they can be called up easily.

One of these documents, called *Antrags- und Anzeigeverfahren bei klinischen Prüfungen* (Application and notification procedures in clinical trials), is a description of the application process to both EC and BfArM, and both for trials with medicinal products and medical devices. This document is also used as SOP regarding several

topics, e.g. who is responsible for what, or for the requirement that the respective principal investigator has to sign approvals or positive opinions prior to filing in the TIF.

6.2 Structure of folders

When a trial folder will be created, a specific structure is preset that should be changed only when necessary. The levels of these folders are given below:

First level “Authorities”



Figure 17: Structure of folders “Authorities”

Second level BfArM

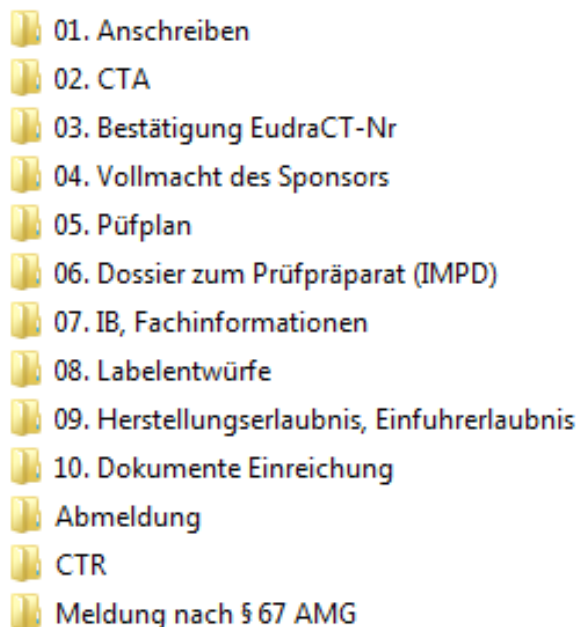


Figure 18: Structure of folders “BfArM”

Some folders of this second level are not yet numbered, because the number may change due to formal or contentual deficiencies, and therefore additional folders with numbers in between must be added.

If there have been amendments in a trial, an additional folder “Amendments” will be created, and given the subsequent number. The subfolders should be numbered from 1. to x., to guaranty a chronological order. As you can see in the example below, there may be several amendments of the same type, so a numeration in this respect is also useful.

-  1. IB-Amendment 1
-  2. Substantial Amendment 1
-  3. Substantial Amendment 2
-  4. Non-substantial amendment 1
-  5. SmPC amendment 1, non-substantial
-  6. IB Amendment 2

Figure 19: Structure of folders “BfArM / Amendments”

Third level BfArM [only for section 10, “Dokumente Einreichung“ (Documents for submission)]

-  01. Anschreiben_Cover Letter
-  02. CTA
-  03. Bestätigung EudraCT-Nr_Confirmation EudraCT Nr
-  04. Vollmacht_Authorization Letter
-  05. Prüfplan_Protocol
-  06. Dossier zum Prüfpräparat_IMP
-  07. IB, Fachinformationen_IB, SmPC
-  08. Label
-  09. Herstellungserlaubnis_Manufacturing Licence

Figure 20: Structure of folders “BfArM / Documents for submission”

The documents in this third level are those ones that have been burnt to CD ROM, as they are the ones, which have been printed and were stored in the submission folders. For all submitted documents, no matter if with the initial application, any answer to

deficiencies or in case of amendments, applies the same. The identification of what has been submitted is therefore very simple. The nomination of these subfolders is both in German and in English to facilitate the transfer to the sponsor's trial team (very often not German-speaking).

Second level EC

-  01. Anschreiben
-  02. Checkliste Antragsunterlagen
-  03. Modul 1, CTA
-  04. Modul 2
-  05. Erklärungen, Bestätigungen der Prüfer
-  06. Bestätigung EudraCT Nr
-  07. Vollmacht des Sponsors
-  08. Material zur Rekrutierung
-  09. Vertrag
-  10. Deutsche Zusammenfassung
-  11. Prüfplan
-  12. PIC, Einwilligungen, Ausweis, Tagebuch
-  13. IB, Fachinformationen
-  14. Probandenversicherung
-  15. Unfallversicherung
-  16. Lebensläufe, GCP-Zertifikate der Prüfarzte
-  17. Dokumente Einreichung
-  Abmeldung
-  CTR

Figure 21: Structure of folders “EC”

Some folders of this second level are not yet numbered, because the number may change due to formal or contentual deficiencies, and therefore additional folders with numbers in between must be added.

If there have been amendments in a trial, an additional folder “Amendments” will be created, and given the subsequent number. The subfolders should be numbered from 1. to x., to guaranty a chronological order. As you can see in the example below, there

may be several amendments of the same type, so a numeration in this respect is also useful.

For a possible subfolder “Amendments” applies again the same as for BfArM, but in contrast to the example for BfArM given above, the non-substantial amendment here was not submitted to the EC, but only stored electronically.

-  1. IB-Amendment 1
-  2. Substantial Amendment 1
-  3. Prüfstellenänderung 1
-  4. Substantial Amendment 2
-  5. Prüfstellenänderung 2
-  6. Non-substantial Amendment 1
-  7. SmPC-Amendment 1, non-substantial
-  8. IB-Amendment 2

Figure 22: Structure of folders “EC / Amendments”

Third level EC [only for section 17, “Dokumente Einreichung” (Documents for submission)]

-  01. Anschreiben_Cover Letter
-  02. EK-Checkliste Antragsunterlagen_Checklist EC Submission
-  03. Modul 1_CTA
-  04. Modul 2_Module 2
-  05. Erklärungen der Prüfer_Confirmations of Investigators
-  06. Bestätigung EudraCT-Nr_Confirmation EudraCT Nr
-  07. Vollmacht_Authorization Letter
-  08. Material zur Rekrutierung_Material for Recruitment
-  09. Vertrag_Contract
-  10. Deutsche Zusammenfassung_German Summary of Protocol
-  11. Prüfplan_Protocol
-  12. Teilnehmerinformation, Einwilligungen, Ausweis, Tagebuch_ICF, ID Card, Diary
-  13. IB, Fachinformationen_IB, SmPC
-  14. Probandenversicherung_Subject Insurance
-  15. Wegeunfallversicherung_Accident Insurance
-  16. Lebensläufe, GCP-Zertifikate der Prüfarzte_CVs, GCP Certificates of Investigators

Figure 23: Structure of folders “EC / Documents for submission”

The documents in this third level are those ones that have been burnt to CD ROM, as they are the ones, which have been printed and were stored in the submission folders. For all submitted documents, no matter if with the initial application, any answer to deficiencies or in case of amendments, applies the same. The identification of what has been submitted is therefore very simple. The nomination of these subfolders is both in German and in English to facilitate the transfer to the sponsor's trial team (very often not German-speaking).

Second level Inspectorate

-  1 Erstanzeige
-  2 Anzeige Amendments
-  3 Anzeige Ende Prüfung

Figure 24: Structure of folders "Inspectorate"

In case of the Inspectorate, and as subsequently shown for the Regional Council, there are no more than three subfolders in the second level, because there are only three types of notifications: First notification, notification of amendments, and notification of the end of the trial. Both authorities will send confirmations to the several notifications, including the respective invoice, but this may take several weeks until receipt, especially as to the Regional Council (normally the Inspectorate is working faster).

Second level RP (Regional Council)

-  1 Erstanzeige
-  2 Anzeige Amendments
-  3 Anzeige Ende Prüfung

Figure 25: Structure of folders "Regional Council"

Second level Insurance

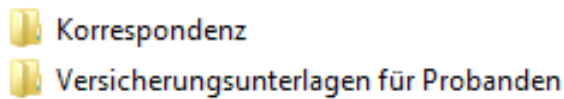


Figure 26: Structure of folders “Insurance”

In case of the insurance, there are only two subfolders, because there will be an application form and a cover letter in the subfolder “*Korrespondenz*” (Correspondence), and the insurance documents for the trial participants will be filed in the subfolder “*Versicherungsunterlagen für Probanden*” (Insurance documents for trial participants). Out of this subfolder, the insurance documents will be printed for the trial participants.

In case of further correspondence with the insurance company, there might be subfolders in the correspondence folder, but this is rare.

6.3 Filenames

Of great help is also the relatively strict abidance to fixed file names. The document “*Benennung der Dateien für die Behörden*” (Naming of files for the authorities) provides an overview, how the files should be named when filing in the electronic trial folder. For example, when the EC has sent a confirmation of formal complete receipt by fax, the file name will be “Date (in the format YYYY-MM-DD)_Study code_EC_Receipt formal complete submission.pdf”.

Word files (e.g. cover letter, application form, module 2) shall not be stored with a date in the file name because they may change several times from the first draft to the final version. Then the date would have to be changed each time, otherwise it would be wrong after the first update.

This is useful only for pdf files, because they will not change any more. By dating as many documents as possible, the letter of positive opinion from the EC, which lists all submitted documents, may be checked more easily, whether all dates of the relevant documents are stated correctly. Just a look at the date in the file name of the

respective document confirms the correctness. In case the dates differ, the pdf file should be opened to verify the date in the file name. If the EC clerk has stated the wrong date, the project manager or PI should be asked, if a corrected version of the opinion letter shall be requested. This will always be the case, if relevant documents are affected, such as the protocol or the IB.

Correspondence from and to the EC

Word Files	PDF Files
Studycode_Cover letter submission_EC	YYYY-MM-DD_Studycode_Cover letter submission_EC
	YYYY-MM-DD_Studycode_EC_Receipt submission
	YYYY-MM-DD_Studycode_EC_Formal deficiencies
Studycode_Answer letter formal deficiencies_EC	YYYY-MM-DD_Studycode_Answer letter formal deficiencies_EC
	YYYY-MM-DD_Studycode_EC_Contentual deficiencies
Studycode_Answer letter contentual deficiencies_EC	YYYY-MM-DD_Studycode_Answer letter contentual deficiencies_EC
	YYYY-MM-DD_Studycode_EC_Charges trial
	YYYY-MM-DD_Studycode_EC_Approval
Studycode_Cover letter amendment Nr_EC	YYYY-MM-DD_Studycode_Cover letter amendment Nr_EC
Studycode_Notification form amendment Nr_EC	YYYY-MM-DD_Studycode_Notification form amendment Nr_EC
	YYYY-MM-DD_Studycode_EC_Receipt amendment Nr
	YYYY-MM-DD_Studycode_EC_Charges amendment Nr
	YYYY-MM-DD_Studycode_EC_Approval amendment Nr
Studycode_Cover letter end of trial_EC	YYYY-MM-DD_Studycode_Cover letter end of trial_EC
Studycode_End of trial form_EC	YYYY-MM-DD_Studycode_End of trial form_EC
	YYYY-MM-DD_Studycode_EC_Confirmation end of trial
Studycode_Cover letter CTR_EC	YYYY-MM-DD_Studycode_Cover letter CTR_EC
	YYYY-MM-DD_Studycode_EC_Receipt CTR

Table 2: Filenames for correspondence "EC"

Correspondence from and to BfArM

Word Files	PDF Files
Studycode_Cover letter submission_BfArM	YYYY-MM-DD_Studycode_Cover letter submission_BfArM
	YYYY-MM-DD_Studycode_BfArM_Receipt submission
	YYYY-MM-DD_Studycode_BfArM_Formal deficiencies
Studycode_Answer letter formal deficiencies_BfArM	YYYY-MM-DD_Studycode_Answer letter formal deficiencies_BfArM
	YYYY-MM-DD_Studycode_BfArM_Contentual deficiencies
Studycode_Answer letter contentual deficiencies_BfArM	YYYY-MM-DD_Studycode_Answer letter contentual deficiencies_BfArM
	YYYY-MM-DD_Studycode_BfArM_Charges trial
	YYYY-MM-DD_Studycode_BfArM_Approval
Studycode_Cover letter amendment Nr_BfArM	YYYY-MM-DD_Studycode_Cover letter amendment Nr_BfArM
Studycode_Notification form amendment Nr_BfArM	YYYY-MM-DD_Studycode_Notification form amendment Nr_BfArM
	YYYY-MM-DD_Studycode_BfArM_Receipt amendment Nr
	YYYY-MM-DD_Studycode_BfArM_Charges amendment Nr
	YYYY-MM-DD_Studycode_BfArM_Approval amendment Nr
Studycode_Cover letter end of trial_BfArM	YYYY-MM-DD_Studycode_Cover letter end of trial_BfArM
Studycode_End of trial form_BfArM	YYYY-MM-DD_Studycode_End of trial form_BfArM
Studycode_Cover letter CTR_BfArM	YYYY-MM-DD_Studycode_Cover letter CTR_BfArM
Studycode_Notification § 67_BfArM	YYYY-MM-DD_Studycode_Notification § 67_BfArM

Table 3: Filenames for correspondence “BfArM”

Correspondence from and to the Inspectorate

Word Files	PDF Files
Studycode_Notification trial_Insp	YYYY-MM-DD_Studycode_Notification trial_Insp
Studycode_ZLG form_Insp	YYYY-MM-DD_Studycode_ZLG form_Insp
	YYYY-MM-DD_Studycode_Insp_Confirmation trial
Studycode_Notification amendment Nr_Insp	YYYY-MM-DD_Studycode_Notification amendment Nr_Insp
Studycode_ZLG form amendment Nr_Insp	YYYY-MM-DD_Studycode_ZLG form amendment Nr_Insp
	YYYY-MM-DD_Studycode_Insp_Confirmation amendment Nr
Studycode_Notification end of trial_Insp	YYYY-MM-DD_Studycode_Notification end of trial_Insp
Studycode_ZLG form end of trial_Insp	YYYY-MM-DD_Studycode_ZLG form end of trial_Insp
	YYYY-MM-DD_Studycode_Insp_Confirmation end of trial

Table 4: Filenames for correspondence "Inspectorate"

Correspondence from and to the Regional Council (RP)

Word Files	PDF Files
Studycode_Notification trial_RP	YYYY-MM-DD_Studycode_Notification trial_RP
Studycode_ZLG form_RP	YYYY-MM-DD_Studycode_ZLG form_RP
	YYYY-MM-DD_Studycode_RP_Confirmation trial
Studycode_Notification amendment Nr_RP	YYYY-MM-DD_Studycode_Notification amendment Nr_RP
Studycode_ZLG form amendment Nr_RP	YYYY-MM-DD_Studycode_ZLG form amendment Nr_RP
	YYYY-MM-DD_Studycode_RP_Confirmation amendment Nr
Studycode_Notification end of trial_RP	YYYY-MM-DD_Studycode_Notification end of trial_RP
Studycode_ZLG form end of trial_RP	YYYY-MM-DD_Studycode_ZLG form end of trial_RP

Table 5: Filenames for correspondence "Regional Council"

Correspondence from and to the Insurance Company

Word Files	PDF Files
Studycode_Notification trial_Insurance	YYYY-MM-DD_Studycode_Notification trial_Insurance
Studycode_Notification form_Insurance	YYYY-MM-DD_Studycode_Notification form_Insurance
	YYYY-MM-DD_Studycode_Subject insurance_Confirmation trial
	YYYY-MM-DD_Studycode_Accident insurance_Confirmation trial
	YYYY-MM-DD_Studycode_Notification end of trial_Insurance

Table 6: Filenames for correspondence “Insurance company”

In case, communication from the authorities will not be received electronically, but only by mail, the letter should be scanned and stored in the respective folder as pdf file.

The list of file names as given above should not be regarded as obligatory, but just as a hint. The name should be clearly understandable – that is what counts in the end. Sticking to a relatively clear order also helps not to overwrite a file by mistake.

Generally, documents coming from the authorities will be stored by stating the name of the authority right after the study code, as already listed above. Documents, which will be sent to the authorities, will be stored by stating the authority’s name at the end of the file name: Date_Study code_Cover letter submission_Authority (e.g. BfARM).pdf”.

It is really obvious from the number of documents received in the course of a trial that a chronological order, and definite file names are mandatory.

English nominations are not necessary for word documents, but this may be helpful, though, because this name could then be transferred directly into the pdf file name. This one should regularly be in English, so that a member of the project team or the RAM can directly send this document to the sponsor who is very often not situated in Germany.

By sorting the files with the date format “YYYY-MM-DD”, a chronological order can be followed easily, and all persons involved in the trial can find the relevant

communication without delay. To follow the chronological order, letters and confirmations that were received from the authorities will be filed without using further subfolders.

For example, when opening the folder for EC, the subfolders are shown and beneath them, the communication from EC is listed chronologically as shown below.

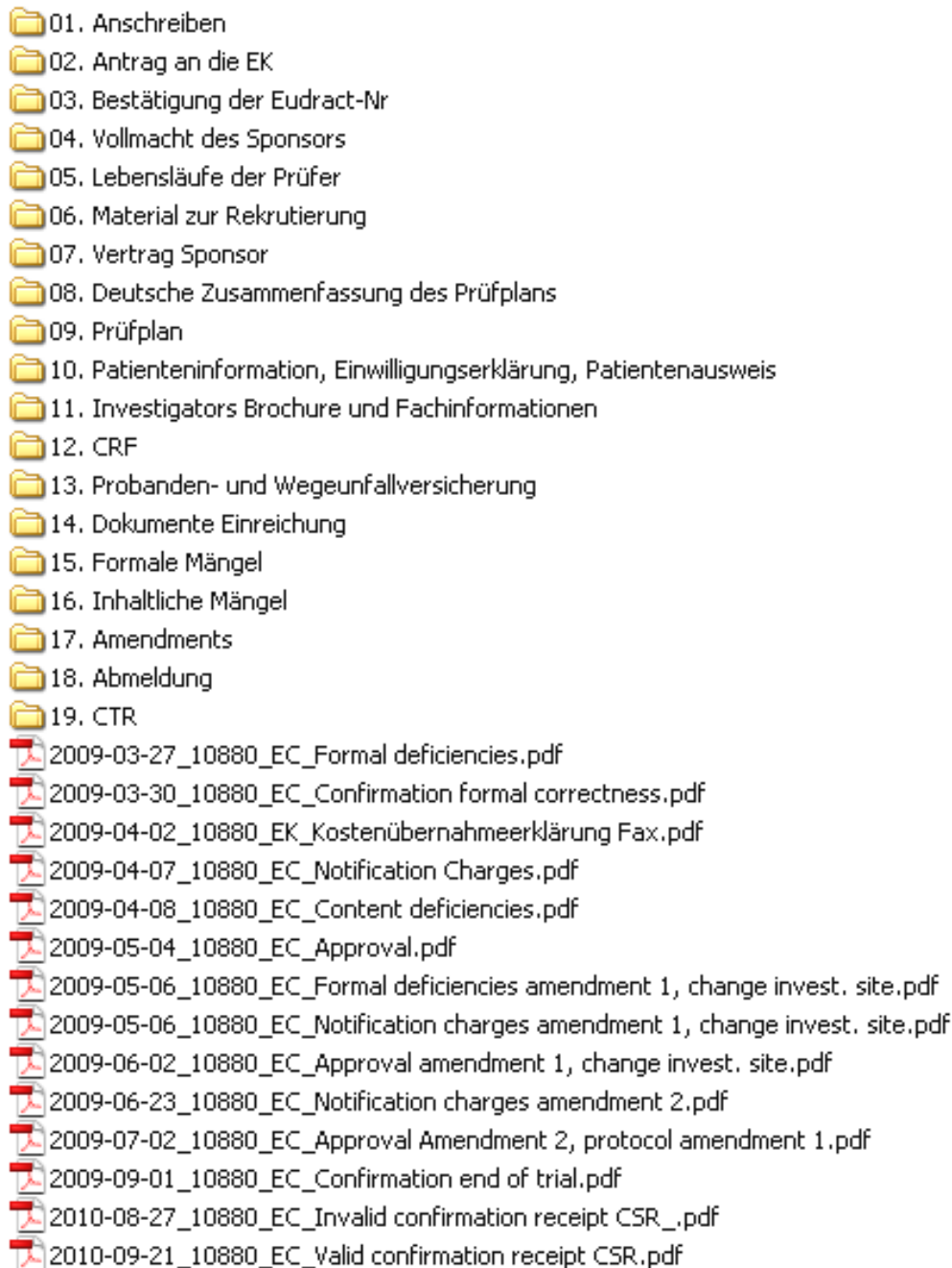


Figure 27: Structure of folders and files “EC”

6.4 Templates

Of enormous help are templates for recurring cover letters and notification forms. In the course of the time, we have created many of such templates – in the following I will just give an overview of what is possible. Nevertheless, before using any of these templates, the inserted information must be checked each time, and should not be taken for granted.

Templates for documents to EC (EK)

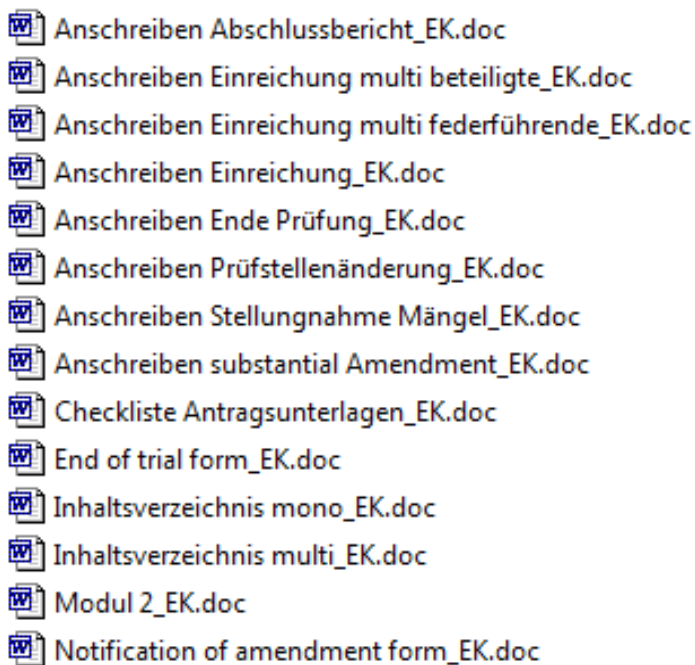


Figure 28: Templates for documents “EC”

Templates for documents to BfArM

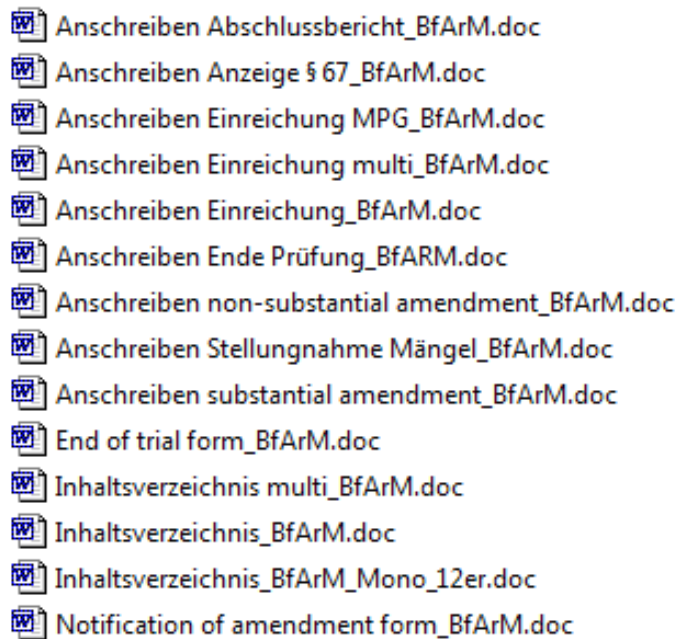


Figure 29: Templates for documents “BfArM”

Templates for documents to the Inspectorate

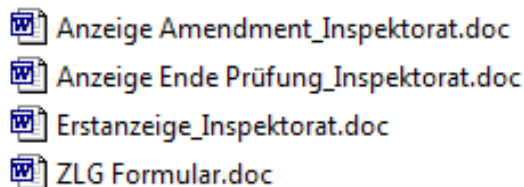


Figure 29: Templates for documents “Inspectorate”

Templates for documents to the Regional Council (RP)

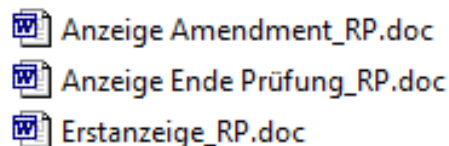


Figure 30: Templates for documents “Regional Council”

Templates for documents to the Insurance

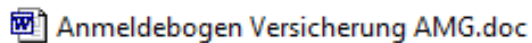


Figure 31: Templates for documents “Insurance”

For the notification of a trial to the insurer, we use an e-mail template, stating the title, the EudraCT number, and the trial ID. This allows the clerks of the insurance to copy these data directly from the e-mail – typing errors will therefore be minimized.

6.5 FAQ List

Other “little helpers” are growing lists of possible faults and deficiencies that will be compiled over the time. These lists should help to avoid making the same mistakes recurrently.

For BfArM, the lists range from formalities over issues with the protocol, the application form, or the labels.

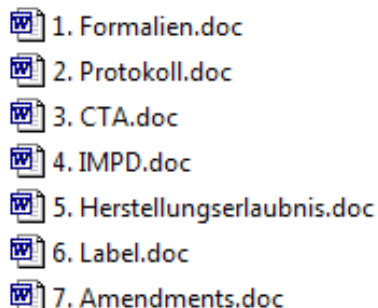


Figure 32: FAQ list “BfArM”

For the EC, the topics differ a bit, depending on the different documents they have to review:

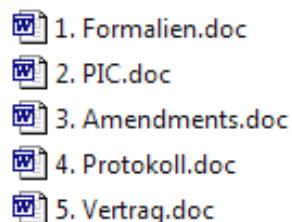


Figure 33: FAQ list “EC”

Many of the possible subjects have already been discussed in chapter 2.5 “Deficiencies”.

The procedure is as follows: For example, in case of a deficiency letter from the EC, the contents of the deficiencies are added just at a glance, but the trial ID and the date of the letter is given in a separate column to enable the identification of the respective letter in the related trial folder. Additionally, the implementation of a corrective action, if any, will be added to the text, e.g. an update of the participant information sheet.

Afterwards, an information e-mail will be sent to several parties: all trial teams, the investigators, the quality control department, and the medical writers. The e-mail summarizes the information given in the updated list and states where the new information can be found.

6.6 ToDo-Client

Of main importance is the possibility to get a quick overview of all trial related regulatory activities. This may be a simple excel sheet, where an operating program could be inserted that helps to follow up on the timelines.

In our company, we have a more complex tool in place, where lots of information can be displayed, and where nearly all relevant timelines can be tracked. Additionally, substitution of the RAMs in case of holidays or illness is easier with this brief overview of the trial progress.

Prior to submission of the application to BfArM and EC, there is only little information given in the table: the EudraCT number, the name of principal investigator and project manager (I have deleted those in the example, due to confidentiality), the type of the trial (of importance for the calculating program → duration of review periods), and the information who will be responsible for the insurance coverage (this helps to prepare the relevant documents, e.g. insurance notification form). Furthermore, the ticks in the fields about the party executing the application – the sponsor or our regulatory department – have influence on the alert function of the program. Consequently, there will be no alert for the notification of the end of a trial to BfArM, when the sponsor is responsible for that communication.

EudraCT-Nr. []

PI []

PM []

Nr./PI/PM und EudraCT-Nr speichern Cancel

Art der Studie

☒ AMG

☐ MPG

☐ Beide Löschen

☐ Multi

☐ Bes. IMP

Vers. Profil

☐ Probanden

☐ Unfall

☒ Beide X

Vers. Sponsor

☐ Probanden

☐ Unfall

☒ Beide X

Zeige alle Studien, bei denen eine Abmeldung in den nächsten 20 Tagen fällig ist OK

32/0484-E8 (14.12.2010)

Zeige alle Studien, bei denen ein Jahresreport in den nächsten 30 Tagen fällig ist OK

110/0478-1002849 (15.12.2010)
57/0465-1245.12 (23.12.2010)
02/0445-1977 (22.01.2011)

Zeige alle Studien, bei denen ein Votum in den nächsten 0 Tagen fällig ist OK

03/0413-GBCI (28.12.2010)

Ethik

Einreichung durch ☒ Profil ☐ Sponsor Löschen

Einreichungsdatum 03.03.2010

Beginn Bearbeitungsfrist 03.03.2010

☐ Formmängel

Inhaltliche Mängel []

Beantwortet bis []

Wieder rausgeschickt am: []

Votum erwartet 02.04.2010

Votum Datum 25.03.2010

☒ pos. Votum

Meldung an Inspektorat/RP 21.04.2010

FPFV: 29.06.2010 LPLV: 19.11.2010

Abmeldung bis zum 17.02.2011

Abmeldung: ☐ EK ☐ Insp./RP ☐ BfArM ☐ Vers.

CTR fällig zum 19.11.2011

CTR EK [] BfArM []

BfArM

Einreichung durch ☒ Profil ☐ Sponsor Löschen

Einreichungsdatum 25.02.2010

Beginn Bearbeitungsfrist 26.02.2010

☐ Formmängel

Inhaltliche Mängel []

Beantwortet bis []

Wieder rausgeschickt am: []

Votum erwartet 28.03.2010

Votum Datum 26.03.2010

☒ pos. Votum

Alte Daten

☒ mit Mängeln (EK)?

Falls ja, welche Art von Mängeln

☐ Formmängel

☐ Inhaltliche Mängel

☐ Beides Löschen

☒ mit Mängeln (BoB)?

Falls ja, welche Art von Mängeln

☐ Formmängel

☐ Inhaltliche Mängel

☐ Beides Löschen

Meldung an Gesundheitsamt []

Meldung an Versicherung []

Meldung FPFV []

Meldung LPLV []

Jahresreport fällig []

Jahresreport erledigt []

Kommentar

- IB-Update Edition 5 wurde vom Sponsor beim BfArM eingereicht
- IB Amendment 1 wurde den lokalen Behörden bereits mit der Erstanzeige gemeldet
- IB Amendment 2 bei den lokalen Behörden wird zusammen mit der Abmeldung vorgenommen

Amendments

Nr.	Bezeichnung/Art	Einreichung EK	Zustimmung erwartet EK	Zustimmung EK	Einreichung BfArM	Zustimmung erwartet BfArM	Zustimmung BfArM	Anzeige Insp./RP
1	IB-Amendment	31.03.2010	20.04.2010	20.04.2010	11.03.2010	31.03.2010	23.03.2010	☒
2	substantial	01.06.2010	21.06.2010	18.06.2010	01.06.2010	21.06.2010	17.06.2010	☒
3	Prüfstellenänderung	24.06.2010	14.07.2010	13.07.2010				☒
4	substantial	01.07.2010	21.07.2010	15.07.2010	01.07.2010	21.07.2010	15.07.2010	☒
5	Prüfstellenänderung	18.08.2010	07.09.2010	24.09.2010				☒
6	IB-Amendment	30.11.2010	20.12.2010	20.12.2010	26.11.2010	16.12.2010	09.12.2010	☐

Statistik

OK Cancel

Projekt: 02/0487-1987

Filter: 1987 Clear

Figure 34: Screenshot of the ToDo Client for an exemplarily trial

When adding the trial code to the section “Filter” at the bottom of the page, the respective trial will be loaded into the form, and all inserted information will be shown. The column on the right side, titled “Alte Daten” (Old data) is a relict of a former functionality, shows only data for older trials, and should therefore not be considered.

When adding the date to “Einreichungsdatum” (Date of submission) the date for “Votum erwartet” (Vote expected) will automatically be calculated according to the review period [as indicated through the ticks to “Art der Studie” (Type of the trial)], and displayed in the respective field. If there were formal or contentual deficiencies, the

date for “*Votum erwartet*” will be updated by inserting further dates into the fields “*Beginn Bearbeitungsfrist*” (Start of review period) and/or “*Wieder rausgeschickt am*” (Resent on). In the end, the date of the final opinion/approval of the EC and BfArM, respectively, will be inserted, and indicated if positive by ticking “*pos. Votum*” (Approval).

The date of “FPFV = First participant – first visit” should be specified to have an overview on the duration of a trial (annual safety report!) and the date of “LPLV = Last participant – last visit” will be important for the notifications of the end of the trial (90 days!, if not a premature termination).

Of great importance is the alerting function of the program. On the left side, small windows give the possibility to reveal the trials, where a notification of the end of the trial, or the trial report (CTR) will be due in the next days. These trial IDs appear automatically, if a fixed limit is exceeded. For example, for the CTR this limit is 30 days – the project team will then be reminded by my colleague or me to ask the sponsor, whether the report is in advanced preparation, or maybe has already been finalised. When the deadlines have expired, the trial ID will be shown in red letters.

After the trial ID has popped up, only a tick in the release box, or the insertion of a specific date will delete that trial ID from the alert window. So in the case of the CTR, filling in the date when the CTR has been sent to EC and/or BfArM will delete the respective trial ID from the window “*Zeige alle Studien, bei denen ein Jahresreport in den nächsten ... Tagen fällig ist*” (Show all trial IDs, for which a CTR will be due in the next ... days).

The window “Amendments” has less functionality because these timelines are easier to track, deficiencies are rare, and the calculating function will mainly help to have an overview by when the votes should be received. The tick field for “*Anzeige Insp./RP*” (Notification to Inspectorate/RP) serves as a reminding tool for the regulatory affairs department not to forget about this duty. As you can see in the example below, the last amendment has not yet been announced to the local authorities, because the trial has already ended and the amendment will be notified to the authorities together with the end of trial notification (this procedure is also inserted in the text field “*Kommentar*”).

“Kommentar” (Comment) is a free text field, where relevant information may be inserted. This is of help, if any “unusual” procedure should be noted, what otherwise may cause confusion without this clarification – when dealing with lots of trials, it is sometimes hard to remember what happened a few months ago in one of them.

A further helpful function is “Statistik” (Statistics), where all trials can be sorted by several criteria, e.g. EudraCT number, date of submission, start of the trial and some more.

From the column “Mängel” (Deficiencies) you can see, that contentual deficiency letters “I” (i.e. *inhaltlich* = contentual) from BfArM are rare, whereas the EC sends them nearly regularly. As already pointed out in section 2.5.1 “Deficiencies”, four trials submitted in February 2010 were the only ones with formal deficiencies “F” regarding the EC submission. BfArM applications have been submitted without formal deficiencies throughout the year.

01.01.2010 bis 29.12.2010																
STUDIE									ETHIK			BFARM			VERS. PROFIL	CTR
EUDRACT-NR.	ART	BEGINN VORB.	BEGINN DURCHF.	BEGINN NACHB.	ENDE	FPFV	LPLV	EINR.	MÄNGEL		EINR.	MÄNGEL				
									F	I		F	I			
2008-004399-30	AMG	15.07.2008	01.02.2011	01.07.2011	01.10.2011			23.12.2010	☐	☐	13.10.2010	☐	☒			
2009-015646-30	AMG	12.11.2009	28.05.2010	04.11.2010	01.03.2011	27.05.2010	03.11.2010	09.02.2010	☒	☒	08.02.2010	☐	☐	Beide	03.11.201	
2009-015897-36	AMG	12.11.2009	03.05.2010	16.08.2010	01.02.2011	03.05.2010	10.08.2010	02.02.2010	☒	☒	01.02.2010	☐	☐	Beide	10.08.201	
2009-016986-28	AMG	16.11.2009	08.04.2010	07.02.2011	15.04.2011	08.04.2010		24.02.2010	☐	☒	01.12.2009	☐	☐			
2009-017121-19	AMG	02.12.2009	22.04.2010	08.07.2010	05.01.2011	22.04.2010	08.07.2010	02.02.2010	☒	☒	01.02.2010	☐	☐	Beide	08.07.201	
2009-017217-30	AMG	14.12.2009	23.06.2010	30.10.2010	01.02.2011	23.06.2010	29.10.2010	08.03.2010	☐	☐	09.03.2010	☐	☐	Beide	29.10.201	
2009-017281-23	AMG	11.12.2009	09.07.2010	24.11.2010	15.03.2011	29.06.2010	19.11.2010	03.03.2010	☐	☐	25.02.2010	☐	☐	Beide	19.11.201	
2009-017627-25	AMG	05.01.2010	27.04.2010	03.09.2010	01.03.2011	28.04.2010	31.08.2010	03.02.2010	☒	☒	01.02.2010	☐	☐	Beide	31.08.201	
2009-017645-55	AMG	18.12.2009	24.03.2010	21.05.2010	01.10.2010	24.03.2010	17.05.2010	25.01.2010	☐	☒	27.01.2010	☐	☐	Beide	17.05.201	
2009-017645-55	AMG	20.01.2010	01.06.2010	01.10.2010	17.12.2010	02.06.2010	08.10.2010	16.04.2010	☐	☒	12.04.2010	☐	☐	Beide	08.10.201	
2009-017666-23	AMG	01.01.2010	26.07.2010	04.02.2011	01.05.2011	03.08.2010	19.11.2010	25.05.2010	☐	☒	17.06.2010	☐	☐	Unfall	19.11.201	
2010-018500-90	AMG	01.01.2010	31.03.2010	30.11.2010	01.01.2011	29.03.2010		11.02.2010	☐	☒	11.02.2010	☐	☐			
2010-018908-83	AMG	17.02.2010	01.09.2010	30.11.2010	01.04.2011	26.08.2010	24.11.2010	06.05.2010	☐	☒	06.05.2010	☐	☐	Beide	24.11.201	
2010-019148-38	AMG	01.01.2010	26.07.2010	22.01.2011	15.05.2011	16.07.2010		15.04.2010	☐	☒	15.04.2010	☐	☒			
2010-019161-28	Beides	01.03.2010	21.04.2010	08.10.2010	01.12.2010	22.04.2010	26.10.2010	02.03.2010	☐	☒	02.03.2010	☐	☐	Beide	26.10.201	
2010-019227-66	AMG	05.03.2010	01.06.2010	10.08.2010	30.11.2010	31.05.2010	06.08.2010	26.04.2010	☐	☒	26.04.2010	☐	☐	Unfall	06.08.201	
2010-019228-30	AMG	05.03.2010	02.06.2010	09.09.2010	01.01.2011	02.06.2010		23.04.2010	☐	☒	26.04.2010	☐	☐	Unfall		
2010-019624-31	AMG	01.09.2010	15.11.2010	01.03.2011	01.05.2011			03.11.2010	☐	☒	02.11.2010	☐	☐			
2010-019641-26	AMG	01.04.2010	02.08.2010	30.11.2010	01.06.2011	27.07.2010	29.11.2010	28.04.2010	☐	☒	28.04.2010	☐	☐	Beide	29.11.201	
2010-019723-64	AMG	16.06.2010	01.09.2010	01.03.2011	01.04.2011	06.09.2010		28.07.2010	☐	☒	15.07.2010	☐	☐			
														Count:	30	

Figure 35: Screenshot of the trial statistics from 01 January to 29 December 2010

6.7 Miscellaneous

If you would have to deal with several member states in case of a multinational trial, the report of the European Forum for Good Clinical Practice [13] may be of great help. It summarizes the main requirements of the European Member States regarding applications of clinical trials to ECs and CAs.

A further source of information may be the database of the Neuromuscular Network, the “Treat-NMD Regulatory Affairs Database”, published by the University Medical Center Freiburg (*Universitätsklinikum Freiburg*). The database contains contact details, national legislation, and other documents of several EU MS and aims to give “advice to people who are involved in the planning of mono- or multi-centre clinical trials within different European countries”. [40] The section “News” provides new or updated information about different topics in the field of clinical trials.

For worldwide clinical trials, the “International Compilation of Human Research Protections” lists more than “1,000 laws, regulations, and guidelines that govern human subjects research in 101 countries, as well as the standards from a number of international and regional organizations. ... Its purpose is to help these groups familiarize themselves with the laws, regulations, and guidelines where the research will be conducted, to assure these standards are followed appropriately.” [31]

7 Conclusion and Outlook

From all the information stated above, it is easy to understand that from the perspective of a regulatory affairs department filing a clinical trial application, fulfilling subsequent duties in the course of the trial, and adhering to all relevant timelines is not only printing some documents received from the sponsor, and putting them in folders, but it is an active process which needs communication between all involved parties. The input from the regulatory affairs department can only be given, when there is a lot of experience in place, and all chances have been used to update the expertise, be it from work or further training on a regular basis.

To have all relevant timelines in mind, well-structured working procedures are obligatory and if such structures are also used through the other involved parties, the final outcome will be better, and working will be facilitated.

As one example, it would be easier for sponsors and applicants, if all ECs in Germany could agree on standardisation of their procedures so that no scope of discretion and grounds for ongoing discussion to relevant issues (e.g. the procedure in connection with amendments) between the regulatory departments of CROs and the sponsors will remain. Some sponsors are hardly to convince that for the Ethics Committee of the Medical Association North Rhine a review period of 20 days, as given in § 10 GCP Ordinance [41], is mandatory and that submission of non-substantial amendments will be rejected because it seems to be common practice of several ECs to accept documents “for your attention” and to confirm receipt of those documents at very short notice. Most likely, no thorough review would have been performed in such a short time frame and it remains debatable, if the sponsor could rely on the legal reliability of such confirmations of receipt in case of doubt.

The same is true for all documents handed out to the trial participants. The Ethics Committee of the Medical Association North Rhine will only review them, apart from the initial application, in connection with a substantial amendment, whereas the EC Working Group always requests those documents after changes, even if not substantial, as stated in Resolution 4: *“Der Arbeitskreis der Ethik-Kommissionen fordert immer die Vorlage folgender nichtbewertungspflichtiger nachträglicher Änderungen an:*

Änderungen in Unterlagen, die sich an die Studienteilnehmer richten (Informationsschriften, Fragebogen, etc.).” [38]

There is also an ongoing discussion whether an accident insurance will be required through the wording in § 40(1)3 German Drug Law [22]: *„8. ...für den Fall, dass bei der Durchführung der klinischen Prüfung ein Mensch getötet oder der Körper oder die Gesundheit eines Menschen verletzt wird, eine Versicherung nach Maßgabe des Absatzes 3 besteht, die auch Leistungen gewährt, wenn kein anderer für den Schaden haftet,...“* and § 40(3)2 German Drug Law [22]: *„Ihr Umfang muss in einem angemessenen Verhältnis zu den mit der klinischen Prüfung verbundenen Risiken stehen und auf der Grundlage der Risikoabschätzung so festgelegt werden, dass für jeden Fall des Todes oder der dauernden Erwerbsunfähigkeit einer von der klinischen Prüfung betroffenen Person mindestens 500 000 Euro zur Verfügung stehen.“*

The wording has been interpreted by at least one member of the Ethics Committee of the Medical Association North Rhine as if also accidents on the way to the trial site must be insured by at least 500,000 EUR, but other EC members of that very EC and also other ECs in Germany have a different opinion. Due to these differences, it might be harder to perform further clinical trials in the responsibility of an EC that is not part of the EC Working Group where only a recommendation for an accident insurance can be found as a result of the *21. Jahresversammlung am 21./22. November 2003* (21st annual assembly on 21/22 November 2003). [35] In the protocols of the following years, the topic “Insurances” was discussed regularly, but by now no agreement is in place that is borne by all German ECs. Consequently, the phrases of the respective PIS/PIC template of the Ethics Committee of the Medical Association North Rhine (Annex 7b) differ in this issue to those ones of the EC Working Group (Annex 7a). It may be subject to another master thesis to compare the different templates of the German ECs, because the Ethics Committee of the Medical Association North Rhine is not nearly the only EC that is not a member of the EC Working Group, and it would be interesting to learn why there are different versions in place although there is the same regulatory basis.

For multinational trials, the Clinical Trials Facilitation Group (CTFG) is working on an alignment of procedures in the different Member States. This working group is part of

the Heads of Medicines Agency, HMA; who agreed already in 2004 to establish this department “to co ordinate implementaion of the EU clinical trials directive 2001/20 EC across the member states” (HMA, URL: <http://www.hma.eu/78.html>, accessed on 19 January 2011). The activity report of the CTFG for the years 2008 and 2009 [5] gives an overview about the already achieved proceedings. It would be more than helpful to have such an alignment procedure between the Ethics Committees in Germany as well, and also between the members of a single EC when assessing the submitted documents of an applicant. Although having the EC Working Group in place, not only the procedures of the different ECs are varying. There are several committee members in one EC, and not all are part of each CTA assessment. So there are preferences of single members that lead to different contentual deficiencies. For example, we submitted several CTA applications with the same wording regarding the informed consent procedure. The phrases were fine with the committees and we got no deficiency letters to that issue. In contrast, in a very recent trial the responsible committee requested to change the relevant wording considerably although parts of the explanations were copied from their own PIS/PIC template.

In the end, an ongoing struggle remains to fulfil the differing requirements of only one single EC, and in my opinion it will be inaccessible to come to a European adaption of procedures when a national or even local adjustment is so hard to reach. A commendable distinction refers to BfArM, where only slight differences between the opinions of the responsible reviewers exist – apparently there are standard operating procedures in place that simplify comparable procedures to ease the application process for applicants and authority.

This is not meant as a complaint, because the role of the Ethics Committees cannot be too highly praised within the procedures around clinical trials – the members of the ECs are working on a voluntary basis and often have to review several trials in a short time frame. The history has shown often enough the bad outcome of trials without a thorough review of the planned activities by an EC (e.g. the thalidomide affair), and it should be the main goal for all involved parties to perform clinical trials with a minimized risk for the participants.

To facilitate the review process and to give the applicants clear advice on how to create their documents, e.g. the PIS/PIC, it may be helpful to install a specific working party with interested members from several ECs, and from regular applicants, such as CROs. By having such a working group, more consistent opinions may possibly be expressed in future votes, and particular topics such as the required wording of specific sections of the submitted documents may be discussed face by face.

In general, a direct contact between applicant and members of the EC (or even with the responsible chairperson) should be facilitated, similar to BfArM, where the respective persons dealing with the case may be called directly, if necessary and helpful.

For the list of already existing templates and guiding documents on the websites of the ECs it should be clearly displayed when a document had been revised – maybe in a section “News”. For example, recently I have found on an EC website the information of the required number of copies in one document as tenfold and in another document as 13-fold, and only a phone call could clarify, what really was needed.

An “electronic only” submission for at least those documents that could be read more easily with the possibility to search expressions, and to jump to specific sections from the table of contents (e.g. the protocol or the IB) would help to facilitate the application process, and to spare loads of paper. Recently, we submitted a trial application with three different IBs, one of them with more than 800 pages – the submission of these files only on CD ROMs would have been of great help for us and probably also for the members of the EC, and the responsible persons at BfArM. Of course, one condition for this would be the technical equipment to read the CD ROMs.

Also of great help would be the possibility to amend a running application in case of comments from either BfArM or EC to the other party. Mostly, the applications are submitted in parallel, and deficiencies must be answered by amending the protocol. Thus, it would simplify and shorten the whole process, if those requested changes could be implemented into the documents sent to the other involved authority/EC without initially waiting for their approval and sending an amendment later on.

8 Summary

Clinical trials are relevant parts of the development and for the marketing authorisation of medicinal products, as well as after authorisation, to gain further knowledge about the product. As of 4 April 2001, the basic principles for the conduct of clinical trials were implemented through Directive 2001/20/EC of the European Parliament and of the Council, the so-called “Clinical Trials Directive”. Through a profound risk assessment of the results of preclinical investigations and previously conducted clinical trials by the Ethics Committees and the relevant competent authorities of the respective Member State, it should be guaranteed that the safety and well-being of the trial participants, and the preservation of their very own data will be protected in every respect.

Directive 2001/20/EC had been transferred into German law in August 2004 with the 12th amendment of the German Drug Law. Since then, a clinical trial must not be conducted without having received a positive opinion of the responsible Ethics Committee and an approval of the competent authority.

Neither the European directives nor the local implementations in Germany, GCP Ordinance and German Drug Law, give detailed information about the format and quantity of the documents that have to be submitted, and even in large pharmaceutical companies, especially if situated in foreign countries, there is sometimes only poor knowledge about the regulatory requirements of the application process and as well during the conduct of a clinical trial in Germany.

Particulars to the application process, required documents, and the timelines may be obtained through the websites of the relevant parties, e.g. either PEI or BfArM for the competent authorities in Germany, the Central Authority of the Länder for Health Protection with regard to Medicinal Products and Medical Devices for the local authorities, and the EC Working Group, or their own websites, respectively, for the Ethics Committees. Additionally, guidance documents, e.g. of the European Community, may serve as road signs for what will be needed, but reality differs quite a lot, especially when dealing with Ethics Committees (ECs). Despite any

recommendations, e.g. from the EC Working Group, each EC seems to have its own way to deal with the submissions.

A “Best Practice Guide” as provided in this master thesis may help to find a way through the regulatory jungle from the application procedure to the clinical trial report in one single document – at least when conducting a mono-centre trial in North Rhine-Westphalia, Germany.

Not only relevant documents are presented and their preparation is discussed, but also timelines, formal requirements, and possible snares regarding the submission package are highlighted.

Templates and drafts are of great help to facilitate recurring steps within the process of application for an authorisation of a clinical trial – a variety of what is possible is shown, and as well other measures to well-structured preparation of important documents and timely adherence to relevant timelines are specified.

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10 Appendices

Annex 1	Cover letter application_EC
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Annex 5	Module 2_EC_English
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Annex 7b	PIS_PIC template_EC North Rhine
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Annex 9	Authorisation letter_Template
Annex 10	Cover letter application_BfArM
Annex 11	Label for IMP_Template
Annex 12	ZLG form_Template
Annex 13	Substantial amendment notification form
Annex 14	Resolution 4_EC Working Group
Annex 15	Declaration end of trial form

Hiermit erkläre ich an Eides statt, die Arbeit selbständig verfasst und keine anderen als die angegebenen Hilfsmittel verwendet zu haben.

Datum

Elke Gurschke

Appendices

Annex 1

Best Practice Guide for Regulatory Affairs in a German CRO

Adresse der EK

Antrag auf zustimmende Bewertung einer klinischen Prüfung nach
§ 40 Abs. 1 Satz 2 AMG sowie § 7 GCP-V

Tagesdatum

EudraCT-Nr.:
Prüfplan-Code:
Titel

Sehr geehrte Damen und Herren,

zur Beratung auf zustimmende Bewertung durch die Ethikkommission xxx machen wir zu oben genannter Studie folgende Angaben:

Sponsor:

Vertreter in der EU: falls zutreffend

Antragsteller im Auftrag des Sponsors:

Prüfstelle:

Hauptprüfer:

Prüfer:

alle beteiligten Prüfer nennen

Labor:

alle beteiligten Labors nennen

Zur Beratung unseres Antrags senden wir Ihnen folgende Unterlagen in 9-facher Ausfertigung:

1. Anschreiben vom
2. Checkliste Antragsunterlagen vom
3. Modul 1 (CTA) vom mit Unterschriftsseite
4. Modul 2 vom
5. Erklärungen / Bestätigungen der Prüfer
6. Bestätigung der EudraCT-Nr.
7. Vollmacht des Sponsors
8. Material zur Rekrutierung
9. Vertrag mit dem Sponsor

Annex 1

Best Practice Guide for Regulatory Affairs in a German CRO

- a. Work Order
- b. Responsibility Split List
- 10. Deutsche Zusammenfassung des Prüfplans, Version [] vom []
- 11. Prüfplan
 - a. Prüfplan, Version [] vom []
 - b. Unterschriften
- 12. Studienteilnehmerinformation / Einwilligungen
 - a. Informationsbroschüre, Version [] vom [] mit Einwilligungserklärung, einschließlich Einwilligungserklärung über die Speicherung personenbezogener Daten, Einwilligungserklärung zur Hepatitis B/C-Untersuchung und HIV-Test, Einverständniserklärung zusätzlicher Schwangerschaftstest bei Frauen, Einwilligungserklärung VIP-Check
 - b. Ergänzende Information und Einwilligung zur Teilnahme an der pharmakogenetischen Untersuchung, Version [] vom []
 - c. Teilnehmerschein
 - d. Tagebuch Version [] vom []
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 - b. Fachinformation Präparat, Stand []
 - c. Summary of Product Characteristics (SmPC) Präparat, Stand []
- 14. Probandenversicherung
 - a. Versicherungsbestätigung
 - b. Versicherungspolice
 - c. Allgemeine Versicherungsbedingungen
 - d. Geschriebene Versicherungsbedingungen
- 15. Wegeunfallversicherung
 - a. Versicherungsbestätigung
 - b. Versicherungspolice
 - c. Allgemeine Unfallversicherungsbedingungen
 - d. Besondere Unfallversicherungsbedingungen
- 16. Lebensläufe / GCP-Zertifikate der Prüfarzte

Hinweise zu den eingereichten Dokumenten:

- Da weder in der GCP-Verordnung noch im AMG die CRFs explizit als notwendige Einreichungsvoraussetzung genannt sind, werden diese Dokumente der Ethikkommission nicht zur Bewertung vorgelegt.
- Die Verhältnisse der Prüfstelle wurden zu Beginn des Jahres nach der Vorlage entsprechender Unterlagen als hinreichend bewertet. Es liegt uns hierzu die Bestätigung der Ethikkommission vor. Alle in dieser Prüfstelle tätigen Prüfarzte verfügen über die entsprechende Ausnahmegenehmigung der Ärztekammer Nordrhein, sind der Ethikkommission vor Aufnahme der Tätigkeiten für die betreffenden Studien gemeldet und von dieser zustimmend bewertet worden.
- Laut den Allgemeinen Versicherungsbedingungen, Abschnitt 1.5 „Zeitliche Geltung“ zum Versicherungsvertrag, die wir in der Anlage beifügen, besteht Versicherungsschutz für die gesamte Laufzeit der Studie, unabhängig von der Laufzeit des jeweiligen Versicherungsjahres.
- Eine Unfallversicherung ist für diese Studie nicht vorgesehen.

Die in Papierform eingereichten Dokumente erhalten Sie gleichzeitig in elektronischer Form im xml- und pdf-Format auf CD-ROM. Wir bestätigen, dass beide Versionen identisch sind.

Für Rückfragen stehen wir Ihnen jederzeit gerne zur Verfügung.

Mit freundlichen Grüßen

Name

Regulatory Affairs Manager

ETHIK-KOMMISSIONEN IN DEUTSCHLAND

EudraCT-Nr.: **Checkliste: Erforderliche Antragsunterlagen für Studien nach AMG**

Die Punkte entsprechen der 12. AMG-Novelle und der GCP-V § 7 Abs. 2 (S. 1 der Checkliste) u. Abs. 3 (S. 2 der Checkliste).

EK (Die Kästchen in der 1. Spalte bitte nicht ausfüllen, werden von Ethik-Kommission ausgefüllt)

Antragsteller (Alle Kästchen in der 2. oder 3. Spalte bitte ausfüllen – per Mausklick: **z** für zutreffend; **nz** für nicht zutreffend, immer mit kurzer Erläuterung)**Anmerkung:** Bitte immer Versionsnummer und –datum angeben (siehe schraffierte Fläche). Sofern keine einzelnen Dokumente beigefügt sind, sondern die Informationen in anderen Dokumenten enthalten sind, bitte das Dokument sowie Kapitel- oder Seitenzahl angeben. Bei Anlagen immer die Anlagen-Nummer angeben.

- | z | nz | |
|--------------------------|-------------------------------------|--|
| ☐ | ☒ | 1. Kopie des Bestätigungsschreibens für die von der Europäischen Datenbank vergebene EudraCT-Nummer des Prüfplans (Anlage 6) |
| ☐ | ☒ | 2. vom Sponsor oder seinem Vertreter unterzeichnetes Begleitschreiben in deutscher Sprache, das die EudraCT-Nummer, den Prüfplancode des Sponsors und den Titel der klinischen Prüfung angibt, Besonderheiten der klinischen Prüfung hervorhebt und auf die Fundstellen der diesbezüglichen Informationen in den weiteren Unterlagen verweist (Anlage 1; Begleitschreiben enthält Angaben zu Versionsnummern und/oder -daten der Anlagen) |
| ☐ | ☒ | 3. vom Hauptprüfer oder vom Leiter der klinischen Prüfung sowie vom Sponsor oder seinem Vertreter unterzeichneter Prüfplan unter Angabe des vollständigen Titels und des Arbeitstitels der klinischen Prüfung, der EudraCT-Nummer, des Prüfplancodes des Sponsors, der Fassung und des Datums (Anlage 11) |
| ☐ | ☒ | 4. Name oder Firma und Anschrift des Sponsors und, sofern vorhanden, seines in der Europäischen Union oder in einem Vertragsstaat des Abkommens über den Europäischen Wirtschaftsraum niedergelassenen Vertreters (Anlage 1) |
| ☐ | ☒ | 5. Namen und Anschriften der Einrichtungen, die als Prüfstelle oder Prüflabor in die klinische Prüfung eingebunden sind, sowie der Hauptprüfer und des Leiters der klinischen Prüfung (Anlage 1) |
| ☐ | ☐ | 6. Angabe der Berufe von Prüfern, die nicht Arzt sind, der wissenschaftlichen Anforderungen des jeweiligen Berufs und der seine Ausübung voraussetzenden Erfahrungen in der Patientenbetreuung sowie Darlegung, dass der jeweilige Beruf für die Durchführung von Forschungen am Menschen qualifiziert und Darlegung der besonderen Gegebenheiten der klinischen Prüfung, die die Prüfertätigkeit eines Angehörigen des jeweiligen Berufs rechtfertigen (Begründung s. Anlage 4, Abs. 12) |
| ☐ | ☒ | 7. Prüferinformation (Investigator's Brochure oder Fachinformation) (Anlage 13) |
| ☐ | ☒ | 8. Bezeichnung und Charakterisierung der Prüfpräparate und ihrer Wirkstoffe (Anlage 10, Abs. 18) |
| ☐ | ☒ | 9. Gegenstand der klinischen Prüfung und ihre Ziele (Anlage 10, Abs. 1-2) |
| ☐ | ☒ | 10. Anzahl, Alter und Geschlecht der betroffenen Personen (Anlage 10, Abs. 13) |
| ☐ | ☒ | 11. Erläuterung der Kriterien für die Auswahl der betroffenen Personen sowie der hierzu zugrundegelegten statistischen Erwägungen (samt Rekrutierungsmaßnahmen) (s. Anlage 4, Abs. 20; Anlage 8) |
| ☐ | ☒ | 12. Begründung dafür, dass die gewählte Geschlechterverteilung in der Gruppe der betroffenen Personen zur Feststellung möglicher geschlechtsspezifischer Unterschiede bei der Wirksamkeit oder Unbedenklichkeit des geprüften Arzneimittels angemessen ist (Anlage 10, Abs. 13) |
| ☐ | ☒ | 13. Plan für eine Weiterbehandlung und medizinische Betreuung der betroffenen Personen nach dem Ende der klinischen Prüfung (Anlage 10, Abs. 15) |
| ☐ | ☐ | 14. mit Gründen versehene Angaben ablehnender Bewertungen der zuständigen Ethik-Kommissionen anderer Mitgliedstaaten der Europäischen Union oder anderer Vertragsstaaten des Abkommens über den Europäischen Wirtschaftsraum sowie Versagungen beantragter Genehmigungen durch die zuständigen Behörden anderer Mitgliedstaaten der Europäischen Union oder anderer Vertragsstaaten des Abkommens über den Europäischen Wirtschaftsraum; sollten zustimmende Bewertungen einer Ethik-Kommission oder eine Genehmigung durch eine zuständige Behörde mit Auflagen versehen worden sein, sind diese anzugeben |

ÖFFENTLICH-RECHTLICHE

ETHIK-KOMMISSIONEN IN DEUTSCHLAND

- ☐ ☒ ☐ 15. die Bestätigung, dass betroffene Personen über die Weitergabe ihrer pseudonymisierten Daten im Rahmen der Dokumentations- und Mitteilungspflichten nach § 12 und § 13 an die dort genannten Empfänger aufgeklärt werden; diese muss eine Erklärung enthalten, dass betroffene Personen, die der Weitergabe nicht zustimmen, nicht in die klinische Prüfung eingeschlossen werden (Anlage 5)

EudraCT-Nr.:

Der Ethik-Kommission sind ferner vorzulegen (Fortsetzung der Checkliste):

EK Antragsteller



- | | | | |
|--------------------------|-------------------------------------|-------------------------------------|---|
| ☐ | ☒ | ☐ | 1. Erläuterung der Bedeutung der klinischen Prüfung (Anlage 10, Abs. 4) |
| ☐ | ☒ | ☐ | 2. Bewertung und Abwägung der vorhersehbaren Risiken und Nachteile der klinischen Prüfung gegenüber dem erwarteten Nutzen für die betroffenen Personen und zukünftig erkrankte Personen (Anlage 10, Abs. 7) |
| ☐ | ☐ | ☒ | 3. Rechtfertigung für die Einbeziehung von Personen nach § 40 Abs. 4 und § 41 Abs. 2 und 3 des Arzneimittelgesetzes in die klinische Prüfung (trifft nicht zu, s. Anlage 4, Abs. 7) |
| ☐ | ☒ | ☐ | 4. Erklärung zur Einbeziehung möglicherweise vom Sponsor oder Prüfer abhängiger Personen (Anlage 5) |
| ☐ | ☒ | ☐ | 5. Angaben zur Finanzierung der klinischen Prüfung (Anlage 4, Abs. 24; Anlage 9) |
| ☐ | ☒ | ☐ | 6. Lebensläufe der Prüfer oder andere geeignete Qualifikationshinweise (Anlage 16) |
| ☐ | ☒ | ☐ | 7. Angaben zu möglichen wirtschaftlichen und anderen Interessen der Prüfer im Zusammenhang mit den Prüfpräparaten (Anlage 5) |
| ☐ | ☐ | ☒ | 8. Angaben zur Eignung der Prüfstelle, insbesondere zur Angemessenheit der dort vorhandenen Mittel und Einrichtungen sowie des zur Durchführung der klinischen Prüfung zur Verfügung stehenden Personals und zu Erfahrungen in der Durchführung ähnlicher klinischer Prüfungen (liegen bereits vor; s. Anschreiben) |
| ☐ | ☒ | ☐ | 9. Informationen und Unterlagen, die die betroffenen Personen erhalten, in deutscher Sprache, sowie eine Darstellung des Verfahrens der Einwilligung nach Aufklärung (Anlage 12) |
| ☐ | ☒ | ☐ | 10. Beschreibung der vorgesehenen Untersuchungsmethoden und eventuelle Abweichungen von den in der medizinischen Praxis üblichen Untersuchungen (s. Anlage 4, Abs. 10) |
| ☐ | ☒ | ☐ | 11. Beschreibung der vorgesehenen Verfahrensweise, mit der verhindert werden soll, dass betroffene Personen gleichzeitig an anderen klinischen Prüfungen oder Forschungsprojekten teilnehmen oder vor Ablauf einer erforderlichen Karenzzeit an der klinischen Prüfung teilnehmen (Anlage 4, Abs. 15) |
| ☐ | ☒ | ☐ | 12. Beschreibung, wie der Gesundheitszustand gesunder betroffener Personen dokumentiert werden soll (Anlage 4, Abs. 16) |
| ☐ | ☒ | ☐ | 13. Nachweis einer Versicherung nach § 40 Abs. 1 Nr. 8 und Abs. 3 des Arzneimittelgesetzes (Versicherungspolice und -bedingungen) (Anlage 14) |
| ☐ | ☒ | ☐ | 14. hinsichtlich der Vergütung der Prüfer und der Entschädigung der betroffenen Personen getroffene Vereinbarungen (Anlage 4, Abs. 21) |
| ☐ | ☒ | ☐ | 15. Erklärung zur Einhaltung des Datenschutzes (Anlage 5) |
| ☐ | ☒ | ☐ | 16. alle wesentlichen Elemente der zwischen dem Sponsor und der Prüfstelle vorgesehenen Verträge (Anlage 9) |
| ☐ | ☒ | ☐ | 17. Kriterien für das Aussetzen oder die vorzeitige Beendigung der klinischen Prüfung (s. Anlage 4, Abs. 22) |
| ☐ | ☐ | ☒ | 18. bei multizentrischen klinischen Prüfungen, die im Geltungsbereich des Arzneimittelgesetzes in mehr als einer Prüfstelle erfolgen, eine Liste der Bezeichnungen und Anschriften der beteiligten Ethik-Kommissionen |
| ☐ | ☒ | ☐ | 19. eine Zusammenfassung der wesentlichen Inhalte des Prüfplans in deutscher Sprache, wenn der Prüfplan nach Absatz 2 Nr. 3 in englischer Sprache vorgelegt wird (Anlage 10) |

ÖFFENTLICH-RECHTLICHE

ETHIK-KOMMISSIONEN IN DEUTSCHLAND

Darüber hinaus liegen den Antragsunterlagen bei:

(Für multizentrische Studien bitte immer beilegen, für monozentrische Studien je nach Vorgabe der zuständigen Ethik-Kommission)

- | | | | | |
|--------------------------|-------------------------------------|--------------------------|----------------------------|----------------------|
| ☐ | ☒ | ☐ | Modul 1, unterschrieben am | <input type="text"/> |
| ☐ | ☒ | ☐ | Modul 2, unterschrieben am | <input type="text"/> |

Verantwortlich für den Sponsor (Unterschrift/Datum):

Verantwortlich für die Ethik-Kommission (Unterschrift/Datum):

Annex 3

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Section J. (Formerly Section K) CHECK LIST OF INFORMATION

(Information that the concerned Member State's Competent Authority and Ethics Committees (CA & EC¹) require according to the table in Attachment 1)

CA	EC		INFORMATION PROVIDED
		1	General
☒	☒	1.1	Receipt of confirmation of EudraCT number
☒	☒	1.2	Covering letter
☒	☒	1.3	Application form
☐	☐	1.4	List of Competent Authorities within the Community to which the application has been submitted and details of decisions
☐	☐	1.5	Copy of ethics committee opinion in the MS concerned when available
☒	☐	1.6	Copy/summary of any scientific advice
☒	☒	1.7	If the applicant is not the sponsor, a letter of authorisation enabling the applicant to act on behalf of the sponsor
		2	Subject related
☐	☒	2.1	Informed consent form
☐	☒	2.2	Subject information leaflet
☐	☒	2.3	Arrangements for recruitment of subjects
		3	Protocol related
☒	☒	3.1	Clinical trial protocol with all current amendments
☐	☒	3.2	Summary of the protocol in the national language
☐	☐	3.3	Peer review of trial when available
☒	☒	3.4	Ethical assessment made by the principal/coordinating investigator, if not given in the application form or protocol
		4	IMP related
☒	☒	4.1	Investigator's brochure
☒	☐	4.2	Investigational Medicinal Product Dossier (IMPD)
☒	☐	4.3	Simplified IMPD for known products (see table 1)
☒	☒	4.4	Summary of Product Characteristics (SmPC) (for products with marketing authorisation in the Community)
☒	☐	4.5	Outline of all active trials with the same IMP
		4.6	If IMP manufactured in E.U. and if no marketing authorisation in EU:
☒	☐	4.6.1	Copy of the manufacturing authorization referred to in Art. 13.1. of the Directive stating the scope of this authorization
		4.7	If IMP not manufactured in E.U. and if no marketing authorisation in EU:
☒	☐	4.7.1	Certification of the QP that the manufacturing site works in compliance with GMP at least equivalent to EU GMP, or that each production batch has undergone all relevant analyses, tests or checks necessary to confirm its quality
☒	☐	4.7.2	Certification of GMP status of active biological substance
☒	☐	4.7.3	Copy of the importers manufacturing authorization referred to in Art. 13.1. of the Directive stating the scope of this authorization
		4.8	Certificate of analysis for test product in exceptional cases :
☒	☐	4.8.1	Where impurities are not justified by the specification or when unexpected impurities (not covered by specification) are detected
☒	☐	4.9	Viral safety studies when applicable.

¹ Tick all boxes to show information provided to the ethics committee concerned (EC) and the competent authority (CA).

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Best Practice Guide for Regulatory Affairs in a German CRO

CA	EC		INFORMATION PROVIDED
☒	☐	4.10	Applicable authorisations to cover trials or products with special characteristics (if available) e.g. GMOs, radiopharmaceuticals
☒	☐	4.11	TSE Certificate when applicable
☒	☐	4.12	Examples of the label in the national language
		5	Facilities & staff related
☐	☒	5.1	Facilities for the trial
☐	☒	5.2	CV of the coordinating investigator in the MS concerned (for multicentre trials)
☐	☒	5.3	CV of each investigator responsible for the conduct of a trial in a site in the MS concerned (principal investigator)
☐	☒	5.4	Information about supporting staff
		6	Finance related
☐	☒	6.1	Provision for indemnity or compensation in the event of injury or death attributable to the clinical trial
☐	☐	6.2	Any insurance or indemnity to cover the liability of the sponsor or investigator
☐	☒	6.3	Compensation to investigators
☐	☒	6.4	Compensation to subjects
☐	☒	6.5	Agreement between the sponsor and the trial site
☐	☐	6.6	Agreement between the investigators and the trial sites
☐	☐	6.7	Certificate of agreement between sponsor and investigator when not in the protocol

Annex 4

Best Practice Guide for Regulatory Affairs in a German CRO

Modul 2

Arbeitskreis Medizinischer Ethik-Kommissionen

1. EudraCT Studiennummer: Nummer
2. Titel der klinischen Prüfung Deutscher Titel Englischer Titel
3. Zusammenfassung der klinischen Prüfung § 7 Abs. 2 Nr. 9 GCP-V Siehe Anlage 10 (Deutsche Zusammenfassung des Prüfplans) oder Siehe Anlage 11 (Prüfplan), Abschnitt x: Summary o.ä.
4. Ergebnisse von präklinischen Untersuchungen oder Begründung für den Verzicht auf präklinische Tests Siehe Anlage 10 (Deutsche Zusammenfassung), Abschnitt 19: Ergebnisse einer dem jeweiligen Stand der wissenschaftlichen Erkenntnis entsprechenden pharmakologisch-toxikologischen Prüfung § 40 Abs. 1 Nr. 7 AMG Wir bestätigen hiermit, dass alle Prüfarzte entsprechend § 40 Abs. 1 Nr. 7 AMG über die pharmakologisch-toxikologischen Ergebnisse und die voraussichtlich mit der klinischen Prüfung verbundenen Risiken durch einen verantwortlichen Wissenschaftler informiert werden. Entsprechende Erklärungen und Bestätigungen aller Prüfer sind dem Antrag als Anlage 5 beigelegt.
5. Primäre Hypothese und wenn relevant, auch sekundäre Hypothesen zu Durchführung der geplanten klinischen Prüfung § 7 Abs. 2 Nr. 9 GCP-V Siehe Anlage 10 (Deutsche Zusammenfassung), Abschnitt 2: Prüfziel(e)
6. Ethische Überlegungen zur geplanten klinischen Prüfung § 7 Abs. 3 Nr. 1 und 2 Siehe Anlage 10 (Deutsche Zusammenfassung), Abschnitt 7: Nutzen-Risiko-Abwägung
7. Gründe für den Einschluss von Personen aus besonders geschützten Gruppen § 7 Abs. 3 Nr. 3 GCP-V Es werden minderjährige bzw. nicht einwilligungsfähige Personen in die Prüfung einbezogen: ☒ Nein ☐ Ja Ausführungen zur Rechtfertigung der Einbeziehung der benannten Personenkreise
8. Beschreibung des Verfahrens zum Einschluss von Teilnehmern (alle zur Verwendung bestimmten Materialien müssen beigelegt werden) § 40 Abs. 1 AMG Siehe Anlage 8 (Material zur Rekrutierung)
9. Vorgehen an der Prüfstelle zur Information und Erlangung der informierten Einwilligung der Studienteilnehmer, der Eltern oder des gesetzlichen Vertreters, wenn erforderlich § 7 Abs. 3 Nr. 9 GCP-V Alle Studienteilnehmer werden vor Beginn der klinischen Prüfung ausführlich (mündlich und schriftlich) über die Studie informiert. Die Aufklärung wird grundsätzlich von einem Arzt durchgeführt. Den Studienteilnehmern wird die Möglichkeit gegeben ihre Teilnahme gründlich zu überdenken und

alle offenen Fragen zu klären. Die Einwilligung zur Teilnahme an der Studie erfolgt durch die Unterschrift des Studienteilnehmers auf der jeweiligen Einwilligungserklärung. Die Informationsbroschüre / Einwilligungserklärung wird jedem Studienteilnehmer zusammen mit den Versicherungsdokumenten ausgehändigt.

10. Studienbezogene Maßnahmen und alle erforderlichen Abweichungen von der üblichen Routine-Behandlung

Siehe **Anlage 11** (Prüfplan), Abschnitt **x**: Methods and Assessments **Study Procedures o.ä.**

§ 7 Abs. 3 Nr. 10 GCP-V

Die Studie bedarf nach § 7 Abs. 3 Nr. 10 GCP-V einer Genehmigung durch das Bundesamt für Strahlenschutz

- ☒ Nein
☐ Ja

11. Risikoeinschätzung, vorhersehbare Risiken der Behandlung und sonstiger studienbedingter Verfahren, die eingesetzt werden sollen

§ 7 Abs. 3 Nr. 2 GCP-V

Siehe **Anlage 12** (Informationsbroschüre / Einwilligungserklärung), Abschnitt 2.2: Welche Risiken oder Unannehmlichkeiten sind mit der Teilnahme an der Studie verbunden?

12. Frühere Erfahrungen aus der Durchführung ähnlicher klinischer Prüfungen an der Prüfstelle

§ 7 Abs. 3 Nr. 8 GCP-V

Die sachlichen, personellen und organisatorischen Anforderungen für die Durchführung der klinischen Prüfung sind gewährleistet. Die Betreuung der Studienteilnehmer durch qualifiziertes Personal wird sichergestellt, es liegen umfangreiche Erfahrungen in der Durchführung klinischer Studien vor. Es nehmen keine nichtärztlichen Prüfer an der Studie teil.

Mit Schreiben vom **ttmmjjjj** wurde von der Ethikkommission **xxx** die Überprüfung der lokalen Verhältnisse der Prüfstelle **xxx** für das laufende Jahr bestätigt. Alle in dieser Prüfstelle tätigen Prüferärzte verfügen über die entsprechende Ausnahmegenehmigung der Ärztekammer **xxx**, sind der Ethikkommission vor Aufnahme der Tätigkeiten für die betreffenden Studien gemeldet und von dieser zustimmend bewertet worden.

Für die weiteren beteiligten Prüfstellen werden in der Anlage 17 (Eignung der Prüfstellen), entsprechende Dokumentationen vorgelegt. Nur bei Multicenterstudien oder weiteren beteiligten Prüfern (z.B. Radiologe)

Die aktuellen Lebensläufe und GCP Zertifikate aller Prüfer sind als **Anlage 16** beigelegt.

13. Alle voraussichtlichen Vorteile für die in die klinische Prüfung einbezogenen Personen

§ 7 Abs. 3 Nr. 2 GCP-V

Siehe **Anlage 12** (Informationsbroschüre / Einwilligungserklärung), Abschnitt 2.1: Welchen persönlichen Nutzen habe ich von der Teilnahme an der Studie?

14. Abhängigkeit zwischen Studienteilnehmer und Prüfer/Sponsor

§ 7 Abs. 3 Nr. 4 GCP-V

Vom Sponsor oder Prüfer abhängige Personen werden nicht in die klinische Studie eingeschlossen. Entsprechende Erklärungen und Bestätigungen aller Prüfer sind dem Antrag als **Anlage 5** beigelegt.

15. Verfahren an der Prüfstelle zur Feststellung, ob der Studienteilnehmer gleichzeitig an anderen Forschungsprojekten beteiligt ist, oder ob eine vorgegebene Zeitspanne seit der letzten Teilnahme an einem Projekt verstrichen ist

§ 7 Abs. 3 Nr. 11 GCP-V

Die Prüfstelle **xxx** nimmt an dem zentralen Probanden-Meldesystem VIP Check international teil. VIP Check international ist eine Datenbank, in der im Interesse der Sicherheit bei der Arzneimittelentwicklung und zum (Selbst-) Schutz der Probanden. Kenndaten von Personen, die an

klinischen Studien teilnehmen, erfasst werden.

Folgende Kenndaten werden aus Personalausweis oder Reisepass in verschlüsselter Form vor Ort gespeichert und an das zentrale Probanden-Meldesystem VIP Check international nach Freiburg gemeldet: Vorname, Nachname, Geburtsort, Geburtstag, Geschlecht, Nationalität sowie Daten zur Studie: Studien-Nummer, Beginn und Ende der Studie, Sperrfrist (bis zu 90 Tage). Das Probanden-Meldesystem in Freiburg wird treuhänderisch und vertraulich von VIP Check international verwaltet.

Das Konzept sowie die Probanden-Datenbank wurden von Datenschutzbeauftragten des baden-württembergischen Innenministeriums besichtigt und bewilligt. Zugang zur Probanden-Datenbank haben nur registrierte Teilnehmer, die klinische Studien mit Probanden durchführen. **Bei Multicenterstudien entsprechend abklären und anpassen**

16. Maßnahmen und Methoden zur Aufzeichnung der Gesundheitskontrollen von gesunden Studienteilnehmern

§ 7 Abs. 3 Nr. 12 GCP-V

Vor Einschluss der Studienteilnehmer in die Studie wird im Rahmen der Aufnahmeuntersuchung eine Anamnese, eine ärztliche Untersuchung u.a. mit Messung der Vitalwerte und Laboruntersuchungen durchgeführt. Alle diesbezüglichen Angaben und Werte werden in den Teilnehmerakten und gegebenenfalls in der studienspezifischen Dokumentation aufgezeichnet. **nur bei gesunden Probanden, ansonsten nicht zutreffend auch in Checkliste anpassen Teil 2, Punkt 12**

17. Methoden, um unerwünschte Ereignisse zu erkennen, sie aufzuzeichnen und zu berichten; Berichterstattung unerwünschter Ereignisse (Beschreibung, wann, von wem und wie dieses erkannt wurde, z.B. durch Befragung oder an Hand von Listen)

Siehe **Anlage 11** (Prüfplan), Abschnitt **X**: Adverse Events and Pregnancies **Subject Safety o.ä.**

18. Vorgesehene Maßnahmen zum Schutze der erhobenen personenbezogenen Daten, Originalbefunde und Körperproben

§ 7 Abs. 3 Nr. 15 GCP-V

Durch Pseudonymisierung der Daten wird sichergestellt, dass die personenbezogenen Angaben geschützt bleiben. Beim Umgang mit personenbezogenen Daten werden die Grundsätze des Datenschutzrechtes beachtet. Entsprechende Erklärungen und Bestätigungen aller Prüfer sind dem Antrag als **Anlage 5** beigefügt.

§ 40 Abs. 2a AMG sowie § 7 Abs. 2 Nr. 15 GCP-V

Die Studienteilnehmer werden über die Weitergabe ihrer pseudonymisierten Daten aufgeklärt. Studienteilnehmer, die einer Weitergabe der Daten nicht zustimmen, werden nicht in die Studie eingeschlossen. Entsprechende Erklärungen und Bestätigungen aller Prüfer sind dem Antrag als **Anlage 5** beigefügt.

19. Plan zur Behandlung oder Versorgung, nachdem der Studienteilnehmer aus der Studie ausgeschieden ist

§ 7 Abs. 2 Nr. 13 GCP-V

Siehe **Anlage 10** (Deutsche Zusammenfassung), Abschnitt 15: Plan für eine Weiterbehandlung und medizinische Betreuung der Studienteilnehmer nach dem Ende der klinischen Prüfung

20. Statistische Erwägungen und Gründe für die Anzahl der in die klinische Prüfung einzubeziehenden Teilnehmer

§ 7 Abs. 2 Nr. 11 und 12 GCP-V

Siehe **Anlage 10** (Deutsche Zusammenfassung), Abschnitt 12: Studienteilnehmer, Geschlechterverteilung, geschlechtsspezifische Unterschiede und zugrunde gelegte statistische Kriterien

21. Betrag und Verfahren zur Bezahlung oder zur Entschädigung der Studienteilnehmer

§ 7 Abs. 3 Nr. 14 GCP-V

Die von den Prüfzentren/Prüfern im Rahmen der Studiendurchführung erbrachten Leistungen werden durch den Sponsor vergütet.

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Die Studienteilnehmer erhalten eine Aufwandsentschädigung:

☐ nein

☒ ja, in Höhe von: EUR **0000**

Bei vorzeitiger Beendigung der Studienteilnahme kann eine angemessene Aufwandsentschädigung ermittelt werden. Die Auszahlung der Aufwandsentschädigung erfolgt bargeldlos und nur gegen Bekanntgabe der Kontonummer eines Kreditinstitutes. Die Aufwandsentschädigung unterliegt einem Abtretungsverbot.

22. Regelung für den Abbruch (bei einer Person) oder zur vorzeitigen Beendigung des Versuchs an der Prüfstelle / den Prüfstellen in einem bestimmten Mitgliedsstaat oder im Ganzen

§ 7 Abs. 3 Nr. 17 GCP-V

Siehe **Anlage 11** (Prüfplan), Abschnitt **x**: Premature Termination of the Trial/Trial Site **o.ä.**

23. Vereinbarungen über den Zugriff des/der Prüfer(s) auf Daten, Publikationsrichtlinien, etc.

Siehe **Anlage 11** (Prüfplan), Abschnitt **x**: Reports and Publications **o.ä.**

oder

Siehe **Anlage 9** (Vertrag), Abschnitt **x**: **XXX**

24. Finanzierung (wenn nicht im Protokoll angegeben) und Informationen über finanzielle oder andere Interessen der / des Prüfer(s)

§ 7 Abs. 3 Nr. 5 und 7 GCP-V

Die Finanzierung erfolgt durch den Sponsor. Die öffentlichen Kassen und sonstige Leistungsträger werden nicht mit den Kosten der Studie und deren unmittelbaren Folgen belastet. Der Vertrag ist den Unterlagen als **Anlage 9** beigelegt.

Von Seiten der Prüfer bestehen keine wirtschaftlichen und anderen Interessen im Zusammenhang mit den Prüfpräparaten. Entsprechende Erklärungen und Bestätigungen aller Prüfer sind dem Antrag als **Anlage 5** beigelegt.

NAME UND UNTERSCHRIFT DES ANTRAGSTELLERS (im Auftrag des Sponsors)

Ich bestätige hiermit, dass die in diesem Antrag angegebenen Informationen zutreffen und ich der Überzeugung bin, dass die klinische Prüfung in Übereinstimmung mit dem Protokoll sowie landesrechtlichen Bestimmungen und den Vorgaben von "Good Clinical Practice" durchgeführt werden kann.

Vorname:

Name:

Adresse:

Position: Regulatory Affairs Manager

Datum:

Unterschrift:

Anmerkung:

Durch die angemessene Bearbeitung von Modul 2 und Einreichung von Modul 1 liegen zu folgenden **20 Punkten** aus der GCP-V Angaben vor:

Modul 2: **§ 7 Abs. 2: Nr. 9, 11, 12, 13, 15**

§ 7 Abs. 3: Nr. 1-5, 9-12, 14, 15, 17

Modul 1: **§ 7 Abs. 2: Nr. 8, 10, 14**

Attachment 4

Information on the application form for the Ethics Committee

Module 1

This first module of the application form to be used to the Ethics Committee is the same as the form used in the submission to the competent authority.

To be found in ‘Detailed guidance for the request for authorisation of a clinical trial on a medicinal product for human use to the competent authorities, notification of substantial amendments and declaration of the end of the trial’ Annex 1.

Module 2

Module 2 is optional and represents a national or local Ethics Committee application form. This second module can contain headings that might be helpful for the ethical review by the Ethics Committee. The aim of the example given in this section is to provide guidance on how trial and site specific information might be presented to present the ethical issues and describe the trial in lay language. The list of items addressed is not complete and can be modified according to the responsibilities assigned to the Ethics Committee in the Member State.

1.	EudraCT trial number Ethics Committee trial ID
2.	Title of the project (understandable for lay persons)
3.	Summary of the project. (justification and relevance)
4.	Results of pre-clinical tests or reasons for not doing pre-clinical tests
5.	Primary hypothesis in this trial (if relevant, also secondary hypotheses)
6.	Research ethical considerations (Identify and state any possible problems that might occur. Present possible gain in knowledge to be obtained in the trial and its importance, possible risks for injuries or distress for the participants. Present your own evaluation of the risk-benefit ratio).
7.	Reason for including persons from vulnerable groups, i.e. minors, temporarily or permanently incapacitated subjects.
8.	Description of the recruitment procedure (all material to be used should be appended)
9.	Procedure at the site to provide information and obtain consent from the subjects, or parents or legal representatives if applicable (who will give the information and when, need for legal representatives, witness etc).
10.	Investigational procedures and any deviations necessary from the routine treatment
11.	Risk assessment, foreseeable risks of treatment and procedures to be used (incl. pain, discomfort, violation of integrity and means to avoid and/or take care of unforeseen / unwanted events)
12.	Previous experience of the conduct of similar research procedures at this site.

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13.	Any foreseeable benefit for included subjects
14.	Relation between subject and investigator (patient-physician, student – teacher etc)
15.	Procedures of the site to check if the subject participates simultaneously in other research or if a required period has elapsed since previous participation in research (of special importance when healthy subjects are included in pharmacology trials).
16.	Requirements and methods for recording health control for healthy subjects (i.e. hospital files or other national requirements)
17.	Methods for searching, recording and reporting adverse effects (describe when, by whom and how, i.e. open questions and/or according to lists)
18.	Procedures used to protect the privacy of recorded data, source documents and samples (if applicable).
19.	Plan for treatment or care after the subject has ended the participation in the trial (who will be responsible and where)
20.	Statistical consideration and reasons for the number of subjects to be included in the trial.
21.	Amount and procedure for remuneration or compensation of subjects (description of amount paid during the participation in the trial and for what, i.e. travel cost, loss of earning, pain and discomfort etc).
22.	Rules for stopping or prematurely ending the trial at the site(s) in this Member State or as a whole
23.	Agreement on investigator's access to data, publication policy etc. (if not available in the protocol)
24.	Sources of funding (if not available in the protocol) and information on financial or other interests of the investigator(s).

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NAME AND SIGNATURE OF APPLICANT - CO-ORDINATING INVESTIGATOR/PRINCIPAL INVESTIGATOR (and/or sponsor, if applicable)	
I hereby confirm that the information given in this application is correct and that I am of the opinion that it will be possible to conduct the trial in accordance with the protocol, national regulations and principles of Good Clinical Practice.	
Name : Surname : Address : Position: :	
Date :	Signature:

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Deutsche Zusammenfassung des Prüfplans			
Prüfplancode		Erstelldatum	
Interner Studiencode		Status / Versions-Nr.	
EudraCT-Nr.		Seite	1 von 1

Deutsche Zusammenfassung des Prüfplans

Prüfplan-Code

Titel

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Deutsche Zusammenfassung des Prüfplans			
Prüfplancode		Erstelldatum	
Interner Studiencode		Status / Versions-Nr.	
EudraCT-Nr.		Seite	2 von 2

Inhaltsverzeichnis

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2 Prüfziel(e)	3
3 Endpunkt(e)	3
4 Rationale der klinischen Prüfung	3
5 Einschlusskriterien	3
6 Ausschlusskriterien	3
7 Nutzen-Risiko-Abwägung	3
8 Hinweise auf Besonderheiten der klinischen Prüfung	4
9 Phase der Prüfung	4
10 Studiendesign	4
11 Art der Prüfung	4
12 Vorgesehene Dauer der Prüfung	4
13 Studienteilnehmer, Geschlechterverteilung, geschlechtsspezifische Unterschiede und zugrunde gelegte statistische Kriterien	4
14 Auswertkriterien, Zwischenauswertung	5
15 Plan für eine Weiterbehandlung und medizinische Betreuung der Studienteilnehmer nach dem Ende der klinischen Prüfung	5
16 Abbruchkriterien	5
17 Prüfpräparat(e)	5
18 Bezeichnung und Charakterisierung der Prüfpräparate und ihrer Wirkstoffe	5
19 Ergebnisse einer dem jeweiligen Stand der wissenschaftlichen Erkenntnis entsprechenden pharmakologisch-toxikologischen Prüfung	5
20 Vorprüfungen am Menschen	5

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Deutsche Zusammenfassung des Prüfplans			
Prüfplancode		Erstelldatum	
Interner Studiencode		Status / Versions-Nr.	
EudraCT-Nr.		Seite	3 von 3

1 Wissenschaftliche Kurzbeschreibung

2 Prüfziel(e)

2.1 Primäres Prüfziel

2.2 Sekundäre Prüfziele

3 Endpunkt(e)

3.1 Primärer Endpunkt

3.2 Sekundäre Endpunkte

4 Rationale der klinischen Prüfung

Rechtfertigung und Relevanz

5 Einschlusskriterien

nur die wichtigsten Kriterien in Bullet points

6 Ausschlusskriterien

nur die wichtigsten Kriterien in Bullet points

7 Nutzen-Risiko-Abwägung

Gegenüberstellung und Bewertung vorhersehbarer Risiken und Nachteile (Nebenwirkungen und Belastungen) der klinischen Prüfung zu dem erwarteten Nutzen für Studienteilnehmer und zukünftig erkrankte Personen

Ethische Überlegungen zur geplanten klinischen Prüfung (alle möglicherweise auftretenden Probleme)

möglicher Wissenszuwachs, der aus der klinischen Prüfung erhalten werden soll und seine Bedeutung

mögliche Risiken für Gesundheitsschäden, Beeinträchtigungen, Belastungen oder sonstige Nachteile der Studienteilnehmer

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Deutsche Zusammenfassung des Prüfplans			
Prüfplancode		Erstelldatum	
Interner Studiencode		Status / Versions-Nr.	
EudraCT-Nr.		Seite	4 von 4

8 Hinweise auf Besonderheiten der klinischen Prüfung

möglichst mit Verweisen auf die Fundstelle in den Unterlagen (z.B. erstmalige Anwendung am Menschen, Anwendung bei einer speziellen Population von Patienten)

9 Phase der Prüfung

10 Studiendesign

- | | | | |
|--|---|--|--|
| ☐ offen | ☐ blind | ☐ doppelblind | |
| ☐ vergleichend | ☐ randomisiert | ☐ cross-over | ☐ placebokontrolliert |
| ☐ monozentrisch | ☐ multizentrisch | ☐ multinational | |

11 Art der Prüfung

- | | | |
|--|--|--|
| ☐ Prophylaxe | ☐ Diagnostik | ☐ Therapie |
| ☐ Pharmakokinetik | ☐ Pharmakodynamik | ☐ Pharmakogenetik |
| ☐ Verträglichkeit | ☐ Wirksamkeit | ☐ Bioäquivalenz |
| ☐ Sonstige → | | |

12 Vorgesehene Dauer der Prüfung

Insgesamt:

Beginn:

Ende:

13 Studienteilnehmer, Geschlechterverteilung, geschlechtsspezifische Unterschiede und zugrunde gelegte statistische Kriterien

Anzahl der Teilnehmer in der Prüfung insgesamt:

falls zutreffend davon Männer: / Frauen:

Begründung dafür, dass die gewählte Geschlechterverteilung in der Gruppe der Studienteilnehmer zur Feststellung möglicher geschlechtsspezifischer Unterschiede bei der Wirksamkeit oder Unbedenklichkeit des geprüften Arzneimittels angemessen ist

zugrunde gelegte statistische Überlegungen, insbesondere biometrische Methoden, spezielle statistische Auswertung und zu prüfende Hypothese

Angaben zur Erläuterung der Kriterien für die Auswahl der Studienteilnehmer und der zugrunde gelegten statistischen Erwägungen

Annex 6

Best Practice Guide for Regulatory Affairs in a German CRO

Deutsche Zusammenfassung des Prüfplans			
Prüfplancode		Erstelldatum	
Interner Studiencode		Status / Versions-Nr.	
EudraCT-Nr.		Seite	5 von 5

14 Auswertkriterien, Zwischenauswertung

Auswertkriterien

Angaben, ob eine Zwischenauswertung vorgesehen ist

15 Plan für eine Weiterbehandlung und medizinische Betreuung der Studienteilnehmer nach dem Ende der klinischen Prüfung

Textbeispiel für gesunde Teilnehmer

Die Notwendigkeit einer spezifischen Behandlung wird im Regelfall nicht bestehen, da ausschließlich gesunde Studienteilnehmer eingeschlossen werden. Eine medizinische Betreuung über den Studienabschluss hinaus erfolgt gegebenenfalls bei einem vorzeitigen Studienabbruch aus medizinischen Gründen oder sofern das Auftreten unerwünschter Ereignisse dies erfordert.

16 Abbruchkriterien

Kriterien für das Aussetzen oder die vorzeitige Beendigung der klinischen Prüfung sowohl für den Einzelfall als auch für die gesamte Studie

17 Prüfpräparat(e)

falls mehrere Präparate angewendet werden, einzeln zuordnen

☐ Neuentwicklung (ggf. Name)

☐ zugelassen für die Indikation (ggf. Name) bei Anwendung außerhalb der Indikation

☐ zugelassen für die vorgesehene Indikation und Anwendungsform (ggf. Name)

18 Bezeichnung und Charakterisierung der Prüfpräparate und ihrer Wirkstoffe

nur Prüfpräparate (IMPs) aufführen, keine non-IMPs

19 Ergebnisse einer dem jeweiligen Stand der wissenschaftlichen Erkenntnis entsprechenden pharmakologisch-toxikologischen Prüfung

20 Vorprüfungen am Menschen

MUSTERTEXT

**für die Probanden-Information und -Einwilligung
zur Durchführung einer klinischen Prüfung eines Arzneimittels
mit volljährigen einwilligungsfähigen Probanden¹**

empfohlen vom Arbeitskreis Medizinischer Ethik-Kommissionen
gemäß Beschluss vom 14.6.2008

*Alle kursiv gedruckten Textstellen enthalten Hinweise zum Erstellen
der Probanden-Information und -Einwilligung*

Prüfstelle: *Angaben zur jeweiligen Prüfstelle mit Adresse und Telefonnummer*
Prüfarzt:

EUDRACT-Nr. *Diese gehört wie die Angabe der Version der Probanden-Information
auch in die fortlaufende Fußzeile*

Titel der Studie

deutsch, inklusive Prüfplancode

Sehr geehrte Dame, sehr geehrter Herr,

wir möchten Sie fragen, ob Sie bereit sind, an der von uns vorgesehenen klinischen Prüfung (Studie) teilzunehmen.

Klinische Prüfungen sind notwendig, um Erkenntnisse über die Wirksamkeit und Verträglichkeit von Arzneimitteln zu gewinnen oder zu erweitern. Deshalb schreibt der Gesetzgeber im Arzneimittelgesetz vor, dass neue Arzneimittel klinisch geprüft werden müssen. Die klinische Prüfung, die wir Ihnen hier vorstellen, wurde – wie es das Gesetz verlangt – von der zuständigen Ethikkommission zustimmend bewertet und von der zuständigen Behörde genehmigt. Diese klinische Prüfung wird in..... (*Ort der Durchführung*)/an mehreren Orten durchgeführt; es sollen insgesamt ungefähr Personen daran teilnehmen. Die Studie wird veranlasst, organisiert und finanziert durch (*Name, Sitz*), den Sponsor dieser Studie.

Ihre Teilnahme an dieser klinischen Prüfung ist freiwillig. Sie werden in diese Prüfung also nur dann einbezogen, wenn Sie dazu schriftlich Ihre Einwilligung erklären. Sofern Sie nicht an der klinischen Prüfung teilnehmen oder später aus ihr ausscheiden möchten, erwachsen Ihnen daraus keine Nachteile.

Der Prüfarzt hat Ihnen bereits eine Reihe von Informationen zu der geplanten Studie gegeben. Der nachfolgende Text soll Ihnen die Ziele und den Ablauf erläutern. Anschließend wird ein Prüfarzt das Aufklärungsgespräch mit Ihnen führen. Bitte zögern Sie nicht, alle Punkte anzusprechen, die Ihnen unklar sind. Sie werden danach ausreichend Bedenkzeit erhalten, um über Ihre Teilnahme zu entscheiden.

¹ Im Rahmen dieses Textes schließt die männliche Bezeichnung stets die weibliche Bezeichnung mit ein.

1. Warum wird diese Prüfung durchgeführt?

◇◇◇ (Bezeichnung des Prüfpräparats) ist ein Arzneimittel in klinischer Erprobung und wird zur Behandlung von □□□ (Name der Erkrankung) entwickelt, d. h. es ist von der Behörde für die Behandlung dieser Krankheit noch nicht zugelassen (ggf. Hinweis auf bereits bestehende Zulassungen für andere Indikationen). In der geplanten klinischen Prüfung wird ◇◇◇ (Bezeichnung des Prüfpräparats) **zum ersten Mal** (zum ersten Mal in der hier vorgesehenen Dosierung von .../zum ersten Mal in der hier vorgesehenen Dauer von ... Tagen/Wochen) **am Menschen** eingesetzt. ◇◇◇ (Bezeichnung des Prüfpräparats) wurde bisher bei ca. Personen geprüft (Erstanwendung muss besonders hervorgehoben werden).

Im Rahmen der geplanten klinischen Prüfung wird untersucht, wie gut ◇◇◇ (Bezeichnung des Prüfpräparats) von Ihnen vertragen wird und wie Ihr Körper ◇◇◇ (Bezeichnung des Prüfpräparats) aufnimmt, abbaut und ausscheidet.

Den Studienzweck allgemein verständlich beschreiben; bei mehreren Zielsetzungen sollten diese in der Rangfolge ihrer Bedeutung für die klinische Prüfung aufgeführt werden.

2. Erhalte ich das Prüfpräparat auf jeden Fall?

*Alternativ
entweder*

Jeder Studienteilnehmer erhält ◇◇◇ (Bezeichnung des Prüfpräparats) einmal (x mal im Abstand von ... Tagen / Wochen) in der Dosierung von ... (Dosisgruppe angeben). Die Einnahme erfolgt (entweder als Tablette / Kapsel oder genauen Applikationsweg angeben).

*oder
(placebokontrollierte Studie):*

Im Rahmen dieser klinischen Prüfung wird ◇◇◇ (Bezeichnung des Prüfpräparats) mit einem Placebo verglichen. Bei einem Placebo handelt es sich um eine identisch aussehende (z. B. Tablette oder Kapsel), die jedoch keinen Wirkstoff enthält. Im Falle Ihrer Teilnahme werden Sie entweder ◇◇◇ (Bezeichnung des Prüfpräparats) oder das Placebo erhalten. Der Vergleich mit dem Placebo dient dazu, die unerwünschten Wirkungen von ◇◇◇ (Bezeichnung des Prüfpräparats) besser beurteilen zu können. Ob Sie das Prüfpräparat oder das Placebo erhalten, entscheidet ein zuvor festgelegtes Zufallsverfahren, vergleichbar mit dem Werfen einer Münze; dieses wird Randomisierung genannt. Die Wahrscheinlichkeit, ◇◇◇ (Bezeichnung des Prüfpräparats) zu erhalten, beträgt %.

*oder
(Studie mit Vergleichspräparat)*

Im Rahmen dieser klinischen Prüfung wird ◇◇◇ (Bezeichnung des Prüfpräparats) mit ◆◆◆ (Bezeichnung des Vergleichspräparats) verglichen, einem bereits für die Behandlung von □□□ (Name der Erkrankung) zugelassenen Arzneimittel. Im Falle Ihrer Teilnahme werden Sie entweder ◇◇◇ oder ◆◆◆ erhalten. Ob sie ◇◇◇ oder ◆◆◆ erhalten, entscheidet der Zufall (dieses Verfahren wird Randomisierung genannt). Die Wahrscheinlichkeit, ◇◇◇ (Bezeichnung des Prüfpräparats) zu erhalten, beträgt %.

Zur objektiven Gewinnung von Studiendaten ist es notwendig, dass weder Sie noch Ihr Prüfarzt wissen, welches Präparat Sie einnehmen (dieses Verfahren wird als „doppelblind“ bezeichnet). Sollte es aus Sicherheitsgründen notwendig sein, kann unverzüglich festgestellt werden, welches Präparat Sie erhalten haben (falls andere Art der Verblindung vorgenommen wird, Text anpassen).

3. Wie ist der Ablauf der Studie und was muss ich bei Teilnahme beachten?

Vor Aufnahme in diese klinische Prüfung werden Sie zu Ihren Vorerkrankungen und Ihrem aktuellen Gesundheitsstatus befragt, und Sie werden einer umfassenden ärztlichen Untersuchung unterzogen. Dazu gehört insbesondere (Blutdruckmessung u. ä.). Die Möglichkeit Ihrer weiteren Teilnahme an dieser klinischen Prüfung wird von den Ergebnissen dieser Voruntersuchung abhängen.

Bei Teilnahme an der Studie müssen Sie

*Hier **allgemein verständlich** und übersichtlich nur studienbedingte Maßnahmen aufführen (ggf. graphische Darstellung), z. B.*

- Gesamtdauer der Teilnahme
- Einnahme des Prüfpräparats, Eimal-/Mehrfachapplikation, zeitlicher Abstand zwischen den einzelnen Dosisgruppen
- ggf. Absetzen anderer Medikamente (auch rezeptfreie)
- Besuche in Prüfstelle, zeitlicher Aufwand pro Visite (stationäre Aufenthalte besonders angeben)
- Untersuchungen (z. B. Röntgenuntersuchungen, Blutentnahmen – Wie oft? Wie viel jeweils? Wie viel insgesamt?)
- Hinweise auf Bedeutung der Einhaltung von Besuchsterminen für die Sicherheit der Probanden und für den Erfolg der klinischen Prüfung
- Nachbeobachtungen

Zusätzliche Medikamente (auch rezeptfreie), von denen der Prüfarzt noch nichts weiß, dürfen Sie – außer bei Notfällen – nur nach Rücksprache mit Ihrem Prüfarzt einnehmen. Wenn Sie von anderen Ärzten behandelt werden, müssen Sie diese über Ihre Teilnahme an der klinischen Prüfung informieren. Auch Ihr Prüfarzt muss über jede medizinische Behandlung, die Sie durch einen anderen Arzt während der klinischen Prüfung erhalten, informiert werden. Sie erhalten einen Studenausweis, den Sie auch für den Notfall immer mit sich führen sollten.

Alle Prüfpräparate/Medikamente, die Sie im Verlauf dieser klinischen Prüfung bekommen, sollten Sie so sicher aufbewahren, dass sie für Kinder oder andere Personen, die die möglichen Risiken nicht einschätzen können, nicht erreichbar sind. Die Abgabe an Dritte ist untersagt.

Sofern zutreffend, spezielle Anweisungen zur Lagerung der Medikamente z. B. im Kühlschrank.

4. Welchen persönlichen Nutzen habe ich von der Teilnahme an der Studie?

Sie werden durch die Teilnahme an dieser Studie außer einer ärztlichen Untersuchung voraussichtlich keinen persönlichen Gesundheitsnutzen haben. Die Ergebnisse der Studie können aber möglicherweise dazu beitragen, die Behandlung von ☐☐☐ (Name der Erkrankung) zukünftig zu verbessern/besser beurteilen zu können.

5. Welche Risiken sind mit der Teilnahme an der Studie verbunden?

Hier nur studienbedingte Risiken aufführen!

Dabei sind bekannte und mögliche Risiken, Beschwerden und unerwünschte Wirkungen des Prüfpräparats sowie der Vergleichspräparate zu beschreiben. Darüber hinaus müssen mögliche Risiken im Zusammenhang mit studienbedingten Maßnahmen genannt werden.

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Es sollen für den Probanden verständliche Begriffe verwendet werden. Die Häufigkeiten unerwünschter Wirkungen sollen beschrieben werden. Dazu sollen folgende Begriffe mit den entsprechenden Prozentangaben verwendet werden: „sehr häufig“ (> 10 %), „häufig“ (1 – 10 %), „gelegentlich“ (0,1 – 1 %) und „selten“ (< 0,1 %). Ggf. ist auf unterschiedliche Dosisgruppen und damit verbundene Risiken hinzuweisen. Je größer die Gefahren sind, um so deutlicher muss auf sie hingewiesen werden, auch wenn sie selten auftreten.

Die Einnahme/Anwendung von ◇◇◇ (Bezeichnung des Prüfpräparats) kann zu unerwünschten Wirkungen oder Beschwerden führen. Da ◇◇◇ (Bezeichnung des Prüfpräparats) zum ersten Mal am Menschen eingesetzt wird, können Angaben darüber nur aus tierexperimentellen Untersuchungen abgeleitet werden. Bei Versuchen an Tieren traten folgende unerwünschten Wirkungen auf:

*Relevante unerwünschte Wirkungen auflisten, insbesondere solche, die an Primaten gefunden wurden;
Angabe von Schwellendosen und Sicherheitsabstand;
Hinweis, dass in höheren Dosisstufen eher mit unerwünschten Wirkungen zu rechnen ist.*

Da ◇◇◇ (Bezeichnung des Prüfpräparats) zum ersten Mal am Menschen eingesetzt wird, können weitere, bisher nicht bekannte unerwünschte Wirkungen auftreten.

*alternativ
(Wenn schon Erfahrungen am Menschen vorliegen)*

Die Einnahme/Applikation von ◇◇◇ (Bezeichnung des Prüfpräparats) kann zu unerwünschten Wirkungen oder Beschwerden führen. Die bislang beobachteten unerwünschten Wirkungen und Beschwerden umfassen:

Wie bei jeder neuen Substanz können auch bei der Anwendung von ◇◇◇ (Bezeichnung des Prüfpräparats) neue, bisher unbekannte Nebenwirkungen auftreten.

Die bislang beobachteten Nebenwirkungen und Beschwerden bei der Behandlung mit ◆◆◆ (Bezeichnung des Vergleichspräparats) umfassen:

Darüber hinaus können die im Rahmen dieser klinischen Prüfung studienbedingt durchgeführten Maßnahmen mit Risiken behaftet sein oder zu Beschwerden führen. Im Einzelnen handelt es sich um (z. B. Risiken und Belastungen der Blutentnahme, Röntgen).

Bitte teilen Sie den Mitarbeitern der Prüfstelle *alle* Beschwerden, Erkrankungen oder Verletzungen mit, die im Verlauf der klinischen Prüfung auftreten. Falls diese schwerwiegend sind, teilen Sie den Mitarbeitern der Prüfstelle diese bitte umgehend mit, ggf. telefonisch.

*Sofern zutreffend, Hinweis auf Gefahren durch Teilnahme am
Straßenverkehr, Führen von Maschinen etc*

6. Wer darf an dieser klinischen Prüfung nicht teilnehmen?

Sie können an dieser klinischen Prüfung nur teilnehmen, wenn Sie gesund sind und sich nicht gleichzeitig für andere klinische Prüfungen oder andere klinische Forschungsprojekte zur Verfügung stellen oder bis vor kurzem teilgenommen haben (ggf. genaue Karenzzeit angeben).

Die jeweiligen Ausschlusskriterien des Prüfplans sollten nicht in der Probandeninformation aufgeführt werden; vielmehr hat der Prüfarzt die entsprechenden Kriterien zu prüfen.

Für klinische Prüfungen, an denen möglicherweise Frauen im gebärfähigen Alter teilnehmen, sind die folgenden Absätze einzufügen und ggf. an das Studienprotokoll anzupassen:

Schwangere Frauen dürfen an dieser klinischen Prüfung nicht teilnehmen.

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Zu Beginn der klinischen Prüfung müssen sich deshalb alle Frauen einem Schwangerschaftstest unterziehen. Davon ausgenommen sind Frauen nach den Wechseljahren oder solche, die operativ sterilisiert wurden. Durch einen Schwangerschaftstest kann jedoch eine Schwangerschaft erst einige Tage nach der Empfängnis verlässlich nachgewiesen werden.

Im Falle Ihrer Teilnahme an dieser klinischen Prüfung müssen Sie zuverlässige Maßnahmen zur Schwangerschaftsverhütung anwenden. Diese sind (die im Prüfplan geforderten Empfängnisverhütungsmaßnahmen präzise angeben; ggf. Schutzmaßnahmen auch über längere Zeit nach Ausscheiden aus der Studie).

Der Grund dafür ist, dass Alternativen
entweder:

bislang nicht geklärt ist, ob ◇◇◇ (Bezeichnung des Prüfpräparats) zu einer Schädigung des Ungeborenen führen kann/können, wenn es/sie während der Schwangerschaft eingenommen wird/werden.

oder:

aus Tierversuchen/aus der Anwendung am Menschen Hinweise/Belege für ein erhöhtes Risiko einer Schädigung des ungeborenen Lebens vorliegen.

oder:

aus Tierversuchen/aus der Anwendung am Menschen Hinweise/Belege für eine Schädigung des ungeborenen Lebens vorliegen.

Sollten Sie während der klinischen Prüfung schwanger werden oder den Verdacht haben, dass Sie schwanger geworden sind, müssen Sie umgehend den Prüfarzt informieren.

Auch **stillende Frauen** dürfen an dieser klinischen Prüfung **nicht teilnehmen**, da ◇◇◇ (Bezeichnung des Prüfpräparats) mit der Muttermilch in den Körper des Kindes gelangen und zu seiner Schädigung führen könnte(n).

Für **Männer** notwendige Informationen in Abhängigkeit vom Prüfpräparat hier anfügen.

7. Entstehen für mich Kosten durch die Teilnahme an der klinischen Prüfung? Erhalte ich eine Aufwandsentschädigung?

Durch Ihre Teilnahme an dieser klinischen Prüfung entstehen für Sie keine Kosten (sofern für den Studienteilnehmer im Zusammenhang mit seiner Teilnahme an der klinischen Prüfung Kosten entstehen, müssen diese spezifiziert werden).

Sofern Probanden für ihre Teilnahme eine Aufwandsentschädigung erhalten,
sollte der folgende Absatz angefügt werden:

Für Ihre Teilnahme an dieser klinischen Prüfung erhalten Sie eine Aufwandsentschädigung entsprechend den folgenden Bedingungen: (es sollte genau beschrieben werden, unter welchen Voraussetzungen der Proband wie viel erhält).

8. Bin ich während der klinischen Prüfung versichert?

Bei der klinischen Prüfung eines Arzneimittels sind alle Studienteilnehmer gemäß dem Arzneimittelgesetz versichert. Der Umfang des Versicherungsschutzes ergibt sich aus den Versicherungsunterlagen, die Sie *je nach Alternative unten ggf. ergänzen: auf Wunsch* ausgehändigt bekommen.

Wenn Sie vermuten, dass durch die Teilnahme an der klinischen Prüfung Ihre Gesundheit geschädigt oder bestehende Leiden verstärkt wurden, müssen Sie dies unverzüglich dem Versicherer

Name und Anschrift der Versicherung:

Telefon:

Fax:

Versicherungsnummer:

direkt anzeigen, gegebenenfalls mit Unterstützung durch Ihren Prüfarzt, um Ihren Versicherungsschutz nicht zu gefährden. Sofern Ihr Prüfarzt Sie dabei unterstützt, erhalten Sie eine Kopie der Meldung. Sofern Sie Ihre Anzeige direkt an den Versicherer richten, informieren Sie bitte zusätzlich Ihren Prüfarzt.

Bei der Aufklärung der Ursache oder des Umfangs eines Schadens müssen Sie mitwirken und alles unternehmen, um den Schaden abzuwenden und zu mindern.

Während der Dauer der klinischen Prüfung dürfen Sie sich einer anderen medizinischen Behandlung – außer in Notfällen – nur nach vorheriger Rücksprache mit dem Prüfarzt unterziehen. Von einer erfolgten Notfallbehandlung müssen Sie den Prüfarzt unverzüglich unterrichten.

*Alternativ
entweder:*

Sie erhalten ein Exemplar der Versicherungsbestätigung einschließlich der Versicherungsbedingungen. Wir weisen Sie insbesondere auf § 3 (zu den Ausschlüssen), § 6 (zum Umfang der Leistungen) und § 14 II (zu Ihren Obliegenheiten) hin. *(Ggf. an den konkreten Versicherungsvertrag anpassen. Ab 1.1.2008 werden sukzessiv neue Versicherungsbedingungen verwendet. Dann muss der Text lauten: „Wir weisen Sie insbesondere auf Punkt 1.4 (zu den Ausschlüssen), Punkt 3.1 (zum Umfang der Leistungen) und Punkt 4.3 sowie Punkt 4.4. (zu Ihren Obliegenheiten) hin.“)*

oder:

Auf Wunsch erhalten Sie ein Exemplar der Versicherungsbedingungen.

Wir weisen Sie ferner darauf hin, dass Sie auf dem Weg von und zur Prüfstation nicht unfallversichert sind/in folgender Weise versichert sind *(sofern zutreffend, hier die Angaben zur Versicherung wie oben)*.

9. Werden mir neue Erkenntnisse während der klinischen Prüfung mitgeteilt?

Sie werden über neue Erkenntnisse, die in Bezug auf diese klinische Prüfung bekannt werden und die für Ihre Bereitschaft zur weiteren Teilnahme wesentlich sein können, informiert. Auf dieser Basis können Sie dann Ihre Entscheidung zur weiteren Teilnahme an dieser klinischen Prüfung überdenken.

10. Kann meine Teilnahme an der klinischen Prüfung vorzeitig beendet werden?

Sie können jederzeit, auch ohne Angabe von Gründen, Ihre Teilnahme beenden, ohne dass Ihnen dadurch irgendwelche Nachteile entstehen.

Unter gewissen Umständen ist es aber auch möglich, dass der Prüfarzt oder der Sponsor entscheidet, Ihre Teilnahme an der klinischen Prüfung vorzeitig zu beenden, ohne dass Sie auf die Entscheidung Einfluss haben. Die Gründe hierfür können z. B. sein:

- Ihre weitere Teilnahme an der klinischen Prüfung ist ärztlich nicht mehr vertretbar;
- es wird die gesamte klinische Prüfung abgebrochen.

Sofern Sie sich dazu entschließen, vorzeitig aus der klinischen Prüfung auszuschcheiden, oder Ihre Teilnahme aus einem anderen der genannten Gründe vorzeitig beendet wird, ist es für Ihre eigene Sicherheit wichtig, dass Sie sich einer empfohlenen abschließenden Kontrolluntersuchung unterziehen (*evtl. sonstige studienspezifische Angaben ergänzen, insbesondere zu etwaigen weiteren Maßnahmen zur Sicherheit der Studienteilnehmer*).

Der Prüfarzt wird mit Ihnen besprechen, ob und wann weitere Kontrolluntersuchungen notwendig sind.

11. Was geschieht mit meinen Daten?

Während der klinischen Prüfung werden medizinische Befunde und persönliche Informationen von Ihnen erhoben und in der Prüfstelle in Ihrer persönlichen Akte niedergeschrieben oder elektronisch gespeichert. Die für die klinische Prüfung wichtigen Daten werden zusätzlich in pseudonymisierter Form gespeichert, ausgewertet und gegebenenfalls weitergegeben.

Pseudonymisiert bedeutet, dass keine Angaben von Namen oder Initialen verwendet werden, sondern nur ein Nummern- und/oder Buchstabencode, evtl. mit Angabe des Geburtsjahres.

Die Daten sind gegen unbefugten Zugriff gesichert. Eine Entschlüsselung erfolgt nur unter den vom Gesetz vorgeschriebenen Voraussetzungen oder in folgenden Fällen
(Angaben aus dem Studienprotokoll).

Das Arzneimittelgesetz enthält nähere Vorgaben für den erforderlichen Umfang der Einwilligung in die Datenerhebung und -verwendung. **Einzelheiten, insbesondere zur Möglichkeit eines Widerrufs, entnehmen Sie bitte der Einwilligungserklärung, die im Anschluss an diese Probandeninformation abgedruckt ist.**

12. Was geschieht mit meinen Blutproben/Gewebeproben/Aufnahmen mit bildgebenden Verfahren (an die jeweilige Studie anpassen)?

*Alternativ
entweder:*

Die Blutproben/Gewebeproben/Aufnahmen mit bildgebenden Verfahren werden ausschließlich für diese klinische Prüfung verwendet. Etwaiges Restmaterial wird bei Abschluss der Prüfung vernichtet.

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oder:

Die Blutproben/Gewebeproben/Aufnahmen mit bildgebenden Verfahren werden nach Abschluss der Prüfung in folgender Weise verwendet / aufbewahrt:

Erläuterung über Anonymisierung/Pseudonymisierung, soweit voraussehbar Verwendung für andere Zwecke, soweit voraussehbar Dauer und Ort der Aufbewahrung etc., ggf. Verweis auf weiteres Informationsmaterial.

13. An wen wende ich mich bei weiteren Fragen?

Beratungsgespräche an der Prüfstelle

Sie haben stets die Gelegenheit zu weiteren Beratungsgesprächen mit dem auf Seite 1 genannten oder einem anderen Prüfarzt.

Kontaktstelle

Es existiert außerdem eine Kontaktstelle bei der zuständigen Bundesoberbehörde. Teilnehmer an klinischen Prüfungen, ihre gesetzlichen Vertreter oder Bevollmächtigten können sich an diese Kontaktstelle wenden:

Alternativ

*- nur die zuständige Stelle angeben -
entweder:*

Bundesinstitut für Arzneimittel und Medizinprodukte

Fachgebiet Klinische Prüfung / Inspektionen

Kurt-Georg-Kiesinger-Allee 3

53175 Bonn

Telefon: 0228 / 207-4318 Fax: 0228 / 207-4355

e-mail: klinpruefung@bfarm.de

oder:

Paul-Ehrlich-Institut

Referat Klinische Prüfungen

Paul-Ehrlich-Str. 51-59

63225 Langen

Telefon: 06103 / 77-1810 Fax: 06103 / 77-1277

e-mail: klinpruefung@pei.de

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Prüfstelle:

Prüfarzt:

EUDRACT-Nr.

Titel der Studie
deutsch, inklusive Prüfplancode

Einwilligungserklärung

.....
Name des Probanden in Druckbuchstaben

geb. am Teilnehmer-Nr.

Ich bin in einem persönlichen Gespräch durch den Prüfarzt

.....
Name der Ärztin/des Arztes

ausführlich und verständlich über das Prüfmedikament (*und ggf. das Vergleichsmedikament*) sowie über Wesen, Bedeutung, Risiken und Tragweite der klinischen Prüfung aufgeklärt worden. Ich habe darüber hinaus den Text der Probandeninformation sowie die hier nachfolgend abgedruckte Datenschutzerklärung gelesen und verstanden. Ich hatte die Gelegenheit, mit dem Prüfarzt über die Durchführung der klinischen Prüfung zu sprechen. Alle meine Fragen wurden zufrieden stellend beantwortet.

Möglichkeit zur Dokumentation zusätzlicher Fragen seitens des Probanden oder sonstiger Aspekte des Aufklärungsgesprächs:

Ich hatte ausreichend Zeit, mich zu entscheiden.

Mir ist bekannt, dass ich jederzeit und ohne Angabe von Gründen meine Einwilligung zur Teilnahme an der Prüfung zurückziehen kann (mündlich oder schriftlich), ohne dass mir daraus Nachteile entstehen.

Datenschutz:

Mir ist bekannt, dass bei dieser klinischen Prüfung personenbezogene Daten, insbesondere medizinische Befunde über mich erhoben, gespeichert und ausgewertet werden sollen. Die Verwendung der Angaben über meine Gesundheit erfolgt nach gesetzlichen Bestimmungen und setzt vor der Teilnahme an der klinischen Prüfung folgende freiwillig abgegebene Einwilligungserklärung voraus, das heißt ohne die nachfolgende Einwilligung kann ich nicht an der klinischen Prüfung teilnehmen.

1. Ich erkläre mich damit einverstanden, dass im Rahmen dieser klinischen Prüfung personenbezogene Daten, insbesondere Angaben über meine Gesundheit, über mich erhoben und in Papierform sowie auf elektronischen Datenträgern bei/in (*Institution/Ort der Aufzeichnung angeben*) aufgezeichnet werden. Soweit erforderlich, dürfen die erhobenen Daten pseudonymisiert (verschlüsselt) weitergegeben werden:
 - a) an , den Sponsor oder eine von diesem beauftragte Stelle zum Zwecke der wissenschaftlichen Auswertung,
 - b) im Falle eines Antrags auf Zulassung: an den Antragsteller und die für die Zulassung zuständige Behörde (*z. B. Bundesinstitut für Arzneimittel und Medizinprodukte*),
 - c) im Falle unerwünschter Ereignisse: an , den Sponsor, an die jeweils zuständige Ethik-Kommission und die zuständige Bundesoberbehörde (*hier die Bundesoberbehörde eintragen, z. B. Bundesinstitut für Arzneimittel und Medizinprodukte*), sowie von dieser an die Europäische Datenbank.
2. Außerdem erkläre ich mich damit einverstanden, dass autorisierte und zur Verschwiegenheit verpflichtete Beauftragte des Sponsors sowie die zuständigen Überwachungsbehörden in meine beim Prüfarzt vorhandenen personenbezogenen Daten, insbesondere meine Gesundheitsdaten, Einsicht nehmen, soweit dies für die Überprüfung der ordnungsgemäßen Durchführung der Studie notwendig ist. Für diese Maßnahme entbinde ich den Prüfarzt von der ärztlichen Schweigepflicht.
3. Die Einwilligung zur Erhebung und Verarbeitung meiner personenbezogenen Daten, insbesondere der Angaben über meine Gesundheit, ist unwiderruflich. Ich bin bereits darüber aufgeklärt worden, dass ich jederzeit die Teilnahme an der klinischen Prüfung beenden kann. Im Fall eines solchen Widerrufs meiner Einwilligung, an der Studie teilzunehmen, erkläre ich mich damit einverstanden, dass die bis zu diesem Zeitpunkt gespeicherten Daten weiterhin verwendet werden dürfen, soweit dies erforderlich ist, um
 - a) Wirkungen des zu prüfenden Arzneimittels festzustellen,
 - b) sicherzustellen, dass meine schutzwürdigen Interessen nicht beeinträchtigt werden,
 - c) der Pflicht zur Vorlage vollständiger Zulassungsunterlagen zu genügen.
4. Ich erkläre mich damit einverstanden, dass meine Daten nach Beendigung oder Abbruch der Prüfung mindestens zehn Jahre aufbewahrt werden, wie es die Vorschriften über die klinische Prüfung von Arzneimitteln bestimmen. Danach werden meine personenbezogenen Daten gelöscht, soweit nicht gesetzliche, satzungsmäßige oder vertragliche Aufbewahrungsfristen entgegenstehen (*vertraglich vereinbarte Fristen müssen hier genannt werden*).
5. Ich bin über folgende gesetzliche Regelung informiert: Falls ich meine Einwilligung, an der Studie teilzunehmen, widerrufe, müssen alle Stellen, die meine personenbezogenen Daten, insbesondere Gesundheitsdaten, gespeichert haben, unverzüglich prüfen, inwieweit die gespeicherten Daten für die in Nr. 3 a) bis c) genannten Zwecke noch erforderlich sind.
Nicht mehr benötigte Daten sind unverzüglich zu löschen.
6. Ich bin damit einverstanden, dass mein Hausarzt

.....
Name

über meine Teilnahme an der klinischen Prüfung informiert wird (falls nicht gewünscht, bitte streichen).

Annex 7a

Best Practice Guide for Regulatory Affairs in a German CRO

**Ich erkläre mich bereit,
an der oben genannten klinischen Prüfung
freiwillig teilzunehmen.**

Ein Exemplar der Probanden-Information und -Einwilligung (sofern zutreffend: sowie die Versicherungsbedingungen) habe ich erhalten. Ein Exemplar verbleibt im Prüfzentrum.

Name des Probanden in Druckbuchstaben

Datum

Unterschrift des **Probanden**

Ich habe das Aufklärungsgespräch geführt und die Einwilligung des Probanden eingeholt.

Name des Prüfarztes/der Prüferärztin in Druckbuchstaben

Datum

Unterschrift des aufklärenden **Prüfarztes/der Prüferärztin**

MUSTERTEXT

**für die Probanden-Information und -Einwilligung
zur Durchführung einer klinischen Prüfung eines Arzneimittels
mit volljährigen einwilligungsfähigen Probanden¹**

Hinweis

**Dieser Mustertext basiert auf dem Mustertext des Arbeitskreises
Medizinischer Ethik-Kommissionen (Stand 14.06.2008)
enthält jedoch 4 Abweichungen**

*Alle kursiv gedruckten Textstellen enthalten Hinweise zum Erstellen
der Probanden-Information und -Einwilligung*

Prüfstelle: *Angaben zur jeweiligen Prüfstelle mit Adresse und Telefonnummer*
Prüfarzt:

EUDRACT-Nr. *Diese gehört wie die Angabe der Version der Probanden-Information
auch in die fortlaufende Fußzeile*

Titel der Studie

deutsch, inklusive Prüfplancode

Sehr geehrte Dame, sehr geehrter Herr,

wir möchten Sie fragen, ob Sie bereit sind, an der von uns vorgesehenen klinischen Prüfung (Studie) teilzunehmen.

Klinische Prüfungen sind notwendig, um Erkenntnisse über die Wirksamkeit und Verträglichkeit von Arzneimitteln zu gewinnen oder zu erweitern. Deshalb schreibt der Gesetzgeber im Arzneimittelgesetz vor, dass neue Arzneimittel klinisch geprüft werden müssen. Die klinische Prüfung, die wir Ihnen hier vorstellen, wurde – wie es das Gesetz verlangt – von der zuständigen Ethikkommission zustimmend bewertet und von der zuständigen Behörde genehmigt. Diese klinische Prüfung wird in..... (*Ort der Durchführung*)/an mehreren Orten durchgeführt; es sollen insgesamt ungefähr Personen daran teilnehmen. Die Studie wird veranlasst, organisiert und finanziert durch (*Name, Sitz*), den Sponsor dieser Studie.

Ihre Teilnahme an dieser klinischen Prüfung ist freiwillig. Sie werden in diese Prüfung also nur dann einbezogen, wenn Sie dazu schriftlich Ihre Einwilligung erklären. Sofern Sie nicht an der klinischen Prüfung teilnehmen oder später aus ihr ausscheiden möchten, erwachsen Ihnen daraus keine Nachteile.

Der Prüfarzt hat Ihnen bereits eine Reihe von Informationen zu der geplanten Studie gegeben. Der nachfolgende Text soll Ihnen die Ziele und den Ablauf erläutern. Anschließend wird ein Prüfarzt das Aufklärungsgespräch mit Ihnen führen. Bitte zögern Sie nicht, alle Punkte anzusprechen, die Ihnen unklar sind. Sie werden danach ausreichend Bedenkzeit erhalten, um über Ihre Teilnahme zu entscheiden.

¹ Im Rahmen dieses Textes schließt die männliche Bezeichnung stets die weibliche Bezeichnung mit ein.

1. Warum wird diese Prüfung durchgeführt?

◇◇◇ (Bezeichnung des Prüfpräparats) ist ein Arzneimittel in klinischer Erprobung und wird zur Behandlung von □□□ (Name der Erkrankung) entwickelt, d. h. es ist von der Behörde für die Behandlung dieser Krankheit noch nicht zugelassen (ggf. Hinweis auf bereits bestehende Zulassungen für andere Indikationen). In der geplanten klinischen Prüfung wird ◇◇◇ (Bezeichnung des Prüfpräparats) **zum ersten Mal** (zum ersten Mal in der hier vorgesehenen Dosierung von .../zum ersten Mal in der hier vorgesehenen Dauer von ... Tagen/Wochen) **am Menschen** eingesetzt. ◇◇◇ (Bezeichnung des Prüfpräparats) wurde bisher bei ca. Personen geprüft (Erstanwendung muss besonders hervorgehoben werden).

Im Rahmen der geplanten klinischen Prüfung wird untersucht, wie gut ◇◇◇ (Bezeichnung des Prüfpräparats) von Ihnen vertragen wird und wie Ihr Körper ◇◇◇ (Bezeichnung des Prüfpräparats) aufnimmt, abbaut und ausscheidet.

Den Studienzweck allgemein verständlich beschreiben; bei mehreren Zielsetzungen sollten diese in der Rangfolge ihrer Bedeutung für die klinische Prüfung aufgeführt werden.

2. Erhalte ich das Prüfpräparat auf jeden Fall?

Alternativ
entweder

Jeder Studienteilnehmer erhält ◇◇◇ (Bezeichnung des Prüfpräparats) einmal (x mal im Abstand von ... Tagen / Wochen) in der Dosierung von ... (Dosisgruppe angeben). Die Einnahme erfolgt (entweder als Tablette / Kapsel oder genauen Applikationsweg angeben).

oder
(placebokontrollierte Studie):

Im Rahmen dieser klinischen Prüfung wird ◇◇◇ (Bezeichnung des Prüfpräparats) mit einem Placebo verglichen. Bei einem Placebo handelt es sich um eine identisch aussehende (z. B. Tablette oder Kapsel), die jedoch keinen Wirkstoff enthält. Im Falle Ihrer Teilnahme werden Sie entweder ◇◇◇ (Bezeichnung des Prüfpräparats) oder das Placebo erhalten. Der Vergleich mit dem Placebo dient dazu, die unerwünschten Wirkungen von ◇◇◇ (Bezeichnung des Prüfpräparats) besser beurteilen zu können. Ob Sie das Prüfpräparat oder das Placebo erhalten, entscheidet ein zuvor festgelegtes Zufallsverfahren, vergleichbar mit dem Werfen einer Münze; dieses wird Randomisierung genannt. Die Wahrscheinlichkeit, ◇◇◇ (Bezeichnung des Prüfpräparats) zu erhalten, beträgt %.

oder
(Studie mit Vergleichspräparat)

Im Rahmen dieser klinischen Prüfung wird ◇◇◇ (Bezeichnung des Prüfpräparats) mit ◆◆◆ (Bezeichnung des Vergleichspräparats) verglichen, einem bereits für die Behandlung von □□□ (Name der Erkrankung) zugelassenen Arzneimittel. Im Falle Ihrer Teilnahme werden Sie entweder ◇◇◇ oder ◆◆◆ erhalten. Ob sie ◇◇◇ oder ◆◆◆ erhalten, entscheidet der Zufall (dieses Verfahren wird Randomisierung genannt). Die Wahrscheinlichkeit, ◇◇◇ (Bezeichnung des Prüfpräparats) zu erhalten, beträgt %.

Zur objektiven Gewinnung von Studiendaten ist es notwendig, dass weder Sie noch Ihr Prüfarzt wissen, welches Präparat Sie einnehmen (dieses Verfahren wird als „doppelblind“ bezeichnet). Sollte es aus Sicherheitsgründen notwendig sein, kann unverzüglich festgestellt werden, welches Präparat Sie erhalten haben (falls andere Art der Verblindung vorgenommen wird, Text anpassen).

3. Wie ist der Ablauf der Studie und was muss ich bei Teilnahme beachten?

Vor Aufnahme in diese klinische Prüfung werden Sie zu Ihren Vorerkrankungen und Ihrem aktuellen Gesundheitsstatus befragt, und Sie werden einer umfassenden ärztlichen Untersuchung unterzogen. Dazu gehört insbesondere (Blutdruckmessung u. ä.). Die Möglichkeit Ihrer weiteren Teilnahme an dieser klinischen Prüfung wird von den Ergebnissen dieser Voruntersuchung abhängen.

Bei Teilnahme an der Studie müssen Sie

*Hier **allgemein verständlich** und übersichtlich nur studienbedingte Maßnahmen aufführen (ggf. graphische Darstellung), z. B.*

- Gesamtdauer der Teilnahme
- Einnahme des Prüfpräparats, Eimal-/Mehrfachapplikation, zeitlicher Abstand zwischen den einzelnen Dosisgruppen
- ggf. Absetzen anderer Medikamente (auch rezeptfreie)
- Besuche in Prüfstelle, zeitlicher Aufwand pro Visite (stationäre Aufenthalte besonders angeben)
- Untersuchungen (z. B. Röntgenuntersuchungen, Blutentnahmen – Wie oft? Wie viel jeweils? Wie viel insgesamt?)
- Hinweise auf Bedeutung der Einhaltung von Besuchsterminen für die Sicherheit der Probanden und für den Erfolg der klinischen Prüfung
- Nachbeobachtungen

Zusätzliche Medikamente (auch rezeptfreie), von denen der Prüfarzt noch nichts weiß, dürfen Sie – außer bei Notfällen – nur nach Rücksprache mit Ihrem Prüfarzt einnehmen. Wenn Sie von anderen Ärzten behandelt werden, müssen Sie diese über Ihre Teilnahme an der klinischen Prüfung informieren. Auch Ihr Prüfarzt muss über jede medizinische Behandlung, die Sie durch einen anderen Arzt während der klinischen Prüfung erhalten, informiert werden. Sie erhalten einen Studenausweis, den Sie auch für den Notfall immer mit sich führen sollten.

Alle Prüfpräparate/Medikamente, die Sie im Verlauf dieser klinischen Prüfung bekommen, sollten Sie so sicher aufbewahren, dass sie für Kinder oder andere Personen, die die möglichen Risiken nicht einschätzen können, nicht erreichbar sind. Die Abgabe an Dritte ist untersagt.

Sofern zutreffend, spezielle Anweisungen zur Lagerung der Medikamente z. B. im Kühlschrank.

4. Welchen persönlichen Nutzen habe ich von der Teilnahme an der Studie?

Sie werden durch die Teilnahme an dieser Studie außer einer ärztlichen Untersuchung voraussichtlich keinen persönlichen Gesundheitsnutzen haben. Die Ergebnisse der Studie können aber möglicherweise dazu beitragen, die Behandlung von ☐☐☐ (Name der Erkrankung) zukünftig zu verbessern/besser beurteilen zu können.

5. Welche Risiken sind mit der Teilnahme an der Studie verbunden?

Hier nur studienbedingte Risiken aufführen!

Dabei sind bekannte und mögliche Risiken, Beschwerden und unerwünschte Wirkungen des Prüfpräparats sowie der Vergleichspräparate zu beschreiben. Darüber hinaus müssen mögliche Risiken im Zusammenhang mit studienbedingten Maßnahmen genannt werden.

Annex 7b

Best Practice Guide for Regulatory Affairs in a German CRO

Es sollen für den Probanden verständliche Begriffe verwendet werden. Die Häufigkeiten unerwünschter Wirkungen sollen beschrieben werden. Dazu sollen folgende Begriffe mit den entsprechenden Prozentangaben verwendet werden: „sehr häufig“ (> 10 %), „häufig“ (1 – 10 %), „gelegentlich“ (0,1 – 1 %) und „selten“ (< 0,1 %). Ggf. ist auf unterschiedliche Dosisgruppen und damit verbundene Risiken hinzuweisen. Je größer die Gefahren sind, um so deutlicher muss auf sie hingewiesen werden, auch wenn sie selten auftreten.

Die Einnahme/Anwendung von ◇◇◇ (Bezeichnung des Prüfpräparats) kann zu unerwünschten Wirkungen oder Beschwerden führen. Da ◇◇◇ (Bezeichnung des Prüfpräparats) zum ersten Mal am Menschen eingesetzt wird, können Angaben darüber nur aus tierexperimentellen Untersuchungen abgeleitet werden. Bei Versuchen an Tieren traten folgende unerwünschten Wirkungen auf:

*Relevante unerwünschte Wirkungen auflisten, insbesondere solche, die an Primaten gefunden wurden;
Angabe von Schwellendosen und Sicherheitsabstand;
Hinweis, dass in höheren Dosisstufen eher mit unerwünschten Wirkungen zu rechnen ist.*

Da ◇◇◇ (Bezeichnung des Prüfpräparats) zum ersten Mal am Menschen eingesetzt wird, können weitere, bisher nicht bekannte unerwünschte Wirkungen auftreten.

*alternativ
(Wenn schon Erfahrungen am Menschen vorliegen)*

Die Einnahme/Applikation von ◇◇◇ (Bezeichnung des Prüfpräparats) kann zu unerwünschten Wirkungen oder Beschwerden führen. Die bislang beobachteten unerwünschten Wirkungen und Beschwerden umfassen:

Wie bei jeder neuen Substanz können auch bei der Anwendung von ◇◇◇ (Bezeichnung des Prüfpräparats) neue, bisher unbekannte Nebenwirkungen auftreten.

Die bislang beobachteten Nebenwirkungen und Beschwerden bei der Behandlung mit ◆◆◆ (Bezeichnung des Vergleichspräparats) umfassen:

Darüber hinaus können die im Rahmen dieser klinischen Prüfung studienbedingt durchgeführten Maßnahmen mit Risiken behaftet sein oder zu Beschwerden führen. Im Einzelnen handelt es sich um (z. B. Risiken und Belastungen der Blutentnahme, Röntgen).

Bitte teilen Sie den Mitarbeitern der Prüfstelle *alle* Beschwerden, Erkrankungen oder Verletzungen mit, die im Verlauf der klinischen Prüfung auftreten. Falls diese schwerwiegend sind, teilen Sie den Mitarbeitern der Prüfstelle diese bitte umgehend mit, ggf. telefonisch.

*Sofern zutreffend, Hinweis auf Gefahren durch Teilnahme am
Straßenverkehr, Führen von Maschinen etc*

6. Wer darf an dieser klinischen Prüfung nicht teilnehmen?

Sie können an dieser klinischen Prüfung nur teilnehmen, wenn Sie gesund sind und sich nicht gleichzeitig für andere klinische Prüfungen oder andere klinische Forschungsprojekte zur Verfügung stellen oder bis vor kurzem teilgenommen haben (ggf. genaue Karenzzeit angeben).

Die jeweiligen Ausschlusskriterien des Prüfplans sollten nicht in der Probandeninformation aufgeführt werden; vielmehr hat der Prüfarzt die entsprechenden Kriterien zu prüfen.

Für klinische Prüfungen, an denen möglicherweise Frauen im gebärfähigen Alter teilnehmen, sind die folgenden Absätze einzufügen und ggf. an das Studienprotokoll anzupassen:

Schwangere Frauen dürfen an dieser klinischen Prüfung **nicht teilnehmen**.

Zu Beginn der klinischen Prüfung müssen sich deshalb alle Frauen einem Schwangerschaftstest unterziehen. Davon ausgenommen sind Frauen nach den Wechseljahren oder solche, die operativ sterilisiert wurden. Durch einen Schwangerschaftstest kann jedoch eine Schwangerschaft erst einige Tage nach der Empfängnis verlässlich nachgewiesen werden.

Im Falle Ihrer Teilnahme an dieser klinischen Prüfung müssen Sie zuverlässige Maßnahmen zur Schwangerschaftsverhütung anwenden. Diese sind (die im Prüfplan geforderten Empfängnisverhütungsmaßnahmen präzise angeben; ggf. Schutzmaßnahmen auch über längere Zeit nach Ausscheiden aus der Studie).

Der Grund dafür ist, dass Alternativen
entweder:

bislang nicht geklärt ist, ob ◇◇◇ (Bezeichnung des Prüfpräparats) zu einer Schädigung des Ungeborenen führen kann/können, wenn es/sie während der Schwangerschaft eingenommen wird/werden.

oder:

aus Tierversuchen/aus der Anwendung am Menschen Hinweise/Belege für ein erhöhtes Risiko einer Schädigung des ungeborenen Lebens vorliegen.

oder:

aus Tierversuchen/aus der Anwendung am Menschen Hinweise/Belege für eine Schädigung des ungeborenen Lebens vorliegen.

Sollten Sie während der klinischen Prüfung schwanger werden oder den Verdacht haben, dass Sie schwanger geworden sind, müssen Sie umgehend den Prüfarzt informieren.

Auch **stillende Frauen** dürfen an dieser klinischen Prüfung **nicht teilnehmen**, da ◇◇◇ (Bezeichnung des Prüfpräparats) mit der Muttermilch in den Körper des Kindes gelangen und zu seiner Schädigung führen könnte(n).

Für **Männer** notwendige Informationen in Abhängigkeit
vom Prüfpräparat hier anfügen.

7. Entstehen für mich Kosten durch die Teilnahme an der klinischen Prüfung? Erhalte ich eine Aufwandsentschädigung?
--

Durch Ihre Teilnahme an dieser klinischen Prüfung entstehen für Sie keine Kosten (sofern für den Studienteilnehmer im Zusammenhang mit seiner Teilnahme an der klinischen Prüfung Kosten entstehen, müssen diese spezifiziert werden).

Sofern Probanden für ihre Teilnahme eine Aufwandsentschädigung erhalten,
sollte der folgende Absatz angefügt werden:

Für Ihre Teilnahme an dieser klinischen Prüfung erhalten Sie eine Aufwandsentschädigung entsprechend den folgenden Bedingungen: (es sollte genau beschrieben werden, unter welchen Voraussetzungen der Proband wie viel erhält).

8. Bin ich während der klinischen Prüfung versichert?

Bei der klinischen Prüfung eines Arzneimittels sind alle Studienteilnehmer gemäß dem Arzneimittelgesetz versichert. Der Umfang des Versicherungsschutzes ergibt sich aus den Versicherungsunterlagen, die Sie *je nach Alternative unten ggf. ergänzen: auf Wunsch* ausgehändigt bekommen.

Wenn Sie vermuten, dass durch die Teilnahme an der klinischen Prüfung Ihre Gesundheit geschädigt oder bestehende Leiden verstärkt wurden, müssen Sie dies unverzüglich dem Versicherer

Name und Anschrift der Versicherung:

Telefon:

Fax:

Versicherungsnummer:

direkt anzeigen, gegebenenfalls mit Unterstützung durch Ihren Prüfarzt, um Ihren Versicherungsschutz nicht zu gefährden. Sofern Ihr Prüfarzt Sie dabei unterstützt, erhalten Sie eine Kopie der Meldung. Sofern Sie Ihre Anzeige direkt an den Versicherer richten, informieren Sie bitte zusätzlich Ihren Prüfarzt.

Bei der Aufklärung der Ursache oder des Umfangs eines Schadens müssen Sie mitwirken und alles unternehmen, um den Schaden abzuwenden und zu mindern.

Während der Dauer der klinischen Prüfung dürfen Sie sich einer anderen medizinischen Behandlung – außer in Notfällen – nur nach vorheriger Rücksprache mit dem Prüfarzt unterziehen. Von einer erfolgten Notfallbehandlung müssen Sie den Prüfarzt unverzüglich unterrichten.

~~Alternativ
entweder:~~

Sie erhalten ein Exemplar der vollständigen Versicherungsunterlagen (Versicherungsbestätigung einschließlich der Versicherungsbedingungen). Wir weisen Sie insbesondere auf § 3 (zu den Ausschlüssen), § 6 (zum Umfang der Leistungen) und § 14 II (zu Ihren Obliegenheiten) hin. *(Ggf. an den konkreten Versicherungsvertrag anpassen. Ab 1.1.2008 werden sukzessiv neue Versicherungsbedingungen verwendet. Dann muss der Text lauten: „Wir weisen Sie insbesondere auf Punkt 1.4 (zu den Ausschlüssen), Punkt 3.1 (zum Umfang der Leistungen) und Punkt 4.3 sowie Punkt 4.4. (zu Ihren Obliegenheiten) hin.“)*

~~oder:~~

~~Auf Wunsch erhalten Sie ein Exemplar der Versicherungsbedingungen.~~

Wir weisen Sie ferner darauf hin, dass Sie auf dem Weg von und zur Prüfstelle nicht unfallversichert sind/in folgender Weise versichert sind (Angabe der Wegeunfallversicherung).

9. Werden mir neue Erkenntnisse während der klinischen Prüfung mitgeteilt?

Sie werden über neue Erkenntnisse, die in Bezug auf diese klinische Prüfung bekannt werden und die für Ihre Bereitschaft zur weiteren Teilnahme wesentlich sein können, informiert. Auf dieser Basis können Sie dann Ihre Entscheidung zur weiteren Teilnahme an dieser klinischen Prüfung überdenken.

10. Kann meine Teilnahme an der klinischen Prüfung vorzeitig beendet werden?

Sie können jederzeit, auch ohne Angabe von Gründen, Ihre Teilnahme beenden, ohne dass Ihnen dadurch irgendwelche Nachteile entstehen.

Unter gewissen Umständen ist es aber auch möglich, dass der Prüfarzt oder der Sponsor entscheidet, Ihre Teilnahme an der klinischen Prüfung vorzeitig zu beenden, ohne dass Sie auf die Entscheidung Einfluss haben. Die Gründe hierfür können z. B. sein:

- Ihre weitere Teilnahme an der klinischen Prüfung ist ärztlich nicht mehr vertretbar;
- ~~es wird die gesamte klinische Prüfung abgebrochen.~~
- **Ihre weitere Teilnahme an der klinischen Prüfung ist aufgrund Ihrer Missachtung der Studienanordnungen (z.B. Punkt 3, Einnahme zusätzlicher Medikamente ohne Rücksprache mit dem Prüfarzt) nicht mehr vertretbar**
- **es wird die gesamte klinische Prüfung abgebrochen, weil.....**

Sofern Sie sich dazu entschließen, vorzeitig aus der klinischen Prüfung auszuschcheiden, oder Ihre Teilnahme aus einem anderen der genannten Gründe vorzeitig beendet wird, ist es für Ihre eigene Sicherheit wichtig, dass Sie sich einer empfohlenen abschließenden Kontrolluntersuchung unterziehen (*evtl. sonstige studienspezifische Angaben ergänzen, insbesondere zu etwaigen weiteren Maßnahmen zur Sicherheit der Studienteilnehmer*).

Der Prüfarzt wird mit Ihnen besprechen, ob und wann weitere Kontrolluntersuchungen notwendig sind.

11. Was geschieht mit meinen Daten?

Während der klinischen Prüfung werden medizinische Befunde und persönliche Informationen von Ihnen erhoben und in der Prüfstelle in Ihrer persönlichen Akte niedergeschrieben oder elektronisch gespeichert. Die für die klinische Prüfung wichtigen Daten werden zusätzlich in pseudonymisierter Form gespeichert, ausgewertet und gegebenenfalls weitergegeben.

Pseudonymisiert bedeutet, dass keine Angaben von Namen oder Initialen verwendet werden, sondern nur ein Nummern- und/oder Buchstabencode, evtl. mit Angabe des Geburtsjahres.

Die Daten sind gegen unbefugten Zugriff gesichert. Eine Entschlüsselung erfolgt nur unter den vom Gesetz vorgeschriebenen Voraussetzungen oder in folgenden Fällen
(*Angaben aus dem Studienprotokoll*).

Das Arzneimittelgesetz enthält nähere Vorgaben für den erforderlichen Umfang der Einwilligung in die Datenerhebung und -verwendung. **Einzelheiten, insbesondere zur Möglichkeit eines Widerrufs, entnehmen Sie bitte der Einwilligungserklärung, die im Anschluss an diese Probandeninformation abgedruckt ist.**

12. Was geschieht mit meinen Blutproben/Gewebeproben/Aufnahmen mit bildgebenden Verfahren (an die jeweilige Studie anpassen)?

*Alternativ
entweder:*

Die Blutproben/Gewebeproben/Aufnahmen mit bildgebenden Verfahren werden ausschließlich für diese klinische Prüfung verwendet. Etwaiges Restmaterial wird bei Abschluss der Prüfung vernichtet.

oder:

Die Blutproben/Gewebeproben/Aufnahmen mit bildgebenden Verfahren werden nach Abschluss der Prüfung in folgender Weise verwendet / aufbewahrt:

Erläuterung über Anonymisierung/Pseudonymisierung, soweit voraussehbar Verwendung für andere Zwecke, soweit voraussehbar Dauer und Ort der Aufbewahrung etc., ggf. Verweis auf weiteres Informationsmaterial.

13. An wen wende ich mich bei weiteren Fragen?

Beratungsgespräche an der Prüfstelle

Sie haben stets die Gelegenheit zu weiteren Beratungsgesprächen mit dem auf Seite 1 genannten oder einem anderen Prüfarzt.

Kontaktstelle

Es existiert außerdem eine Kontaktstelle bei der zuständigen Bundesoberbehörde. Teilnehmer an klinischen Prüfungen, ihre gesetzlichen Vertreter oder Bevollmächtigten können sich an diese Kontaktstelle wenden:

*Alternativ
- nur die zuständige Stelle angeben -
entweder:*

Bundesinstitut für Arzneimittel und Medizinprodukte
Fachgebiet Klinische Prüfung / Inspektionen
Kurt-Georg-Kiesinger-Allee 3
53175 Bonn

Telefon: 0228 / 207-4318 Fax: 0228 / 207-4355
e-mail: klinpruefung@bfarm.de

oder:

Paul-Ehrlich-Institut
Referat Klinische Prüfungen
Paul-Ehrlich-Str. 51-59
63225 Langen

Telefon: 06103 / 77-1810 Fax: 06103 / 77-1277
e-mail: klinpruefung@pei.de

Annex 7b
Best Practice Guide for Regulatory Affairs in a German CRO

Prüfstelle:

Prüfarzt:

EUDRACT-Nr.

Titel der Studie
deutsch, inklusive Prüfplancode

Einwilligungserklärung

.....
Name des Probanden in Druckbuchstaben

geb. am

Teilnehmer-Nr.

Ich bin in einem persönlichen Gespräch durch den Prüfarzt

.....
Name der Ärztin/des Arztes

ausführlich und verständlich über das Prüfmedikament (*und ggf. das Vergleichsmedikament*) sowie über Wesen, Bedeutung, Risiken und Tragweite der klinischen Prüfung aufgeklärt worden. Ich habe darüber hinaus den Text der Probandeninformation sowie die hier nachfolgend abgedruckte Datenschutzerklärung gelesen und verstanden. Ich hatte die Gelegenheit, mit dem Prüfarzt über die Durchführung der klinischen Prüfung zu sprechen. Alle meine Fragen wurden zufrieden stellend beantwortet.

Möglichkeit zur Dokumentation zusätzlicher Fragen seitens des Probanden oder sonstiger Aspekte des Aufklärungsgesprächs:

Ich hatte ausreichend Zeit, mich zu entscheiden.

Mir ist bekannt, dass ich jederzeit und ohne Angabe von Gründen meine Einwilligung zur Teilnahme an der Prüfung zurückziehen kann (mündlich oder schriftlich), ohne dass mir daraus Nachteile entstehen.

Datenschutz:

Mir ist bekannt, dass bei dieser klinischen Prüfung personenbezogene Daten, insbesondere medizinische Befunde über mich erhoben, gespeichert und ausgewertet werden sollen. Die Verwendung der Angaben über meine Gesundheit erfolgt nach gesetzlichen Bestimmungen und setzt vor der Teilnahme an der klinischen Prüfung folgende freiwillig abgegebene Einwilligungserklärung voraus, das heißt ohne die nachfolgende Einwilligung kann ich nicht an der klinischen Prüfung teilnehmen.

1. Ich erkläre mich damit einverstanden, dass im Rahmen dieser klinischen Prüfung personenbezogene Daten, insbesondere Angaben über meine Gesundheit, über mich erhoben und in Papierform sowie auf elektronischen Datenträgern bei/in (*Institution/Ort der Aufzeichnung angeben*) aufgezeichnet werden. Soweit erforderlich, dürfen die erhobenen Daten pseudonymisiert (verschlüsselt) weitergegeben werden:
 - a) an , den Sponsor oder eine von diesem beauftragte Stelle zum Zwecke der wissenschaftlichen Auswertung,
 - b) im Falle eines Antrags auf Zulassung: an den Antragsteller und die für die Zulassung zuständige Behörde (*z. B. Bundesinstitut für Arzneimittel und Medizinprodukte*),
 - c) im Falle unerwünschter Ereignisse: an , den Sponsor, an die jeweils zuständige Ethik-Kommission und die zuständige Bundesoberbehörde (*hier die Bundesoberbehörde eintragen, z. B. Bundesinstitut für Arzneimittel und Medizinprodukte*), sowie von dieser an die Europäische Datenbank.
2. Außerdem erkläre ich mich damit einverstanden, dass autorisierte und zur Verschwiegenheit verpflichtete Beauftragte des Sponsors sowie die zuständigen Überwachungsbehörden in meine beim Prüfarzt vorhandenen personenbezogenen Daten, insbesondere meine Gesundheitsdaten, Einsicht nehmen, soweit dies für die Überprüfung der ordnungsgemäßen Durchführung der Studie notwendig ist. Für diese Maßnahme entbinde ich den Prüfarzt von der ärztlichen Schweigepflicht.
3. Die Einwilligung zur Erhebung und Verarbeitung meiner personenbezogenen Daten, insbesondere der Angaben über meine Gesundheit, ist unwiderruflich. Ich bin bereits darüber aufgeklärt worden, dass ich jederzeit die Teilnahme an der klinischen Prüfung beenden kann. Im Fall eines solchen Widerrufs meiner Einwilligung, an der Studie teilzunehmen, erkläre ich mich damit einverstanden, dass die bis zu diesem Zeitpunkt gespeicherten Daten weiterhin verwendet werden dürfen, soweit dies erforderlich ist, um
 - a) Wirkungen des zu prüfenden Arzneimittels festzustellen,
 - b) sicherzustellen, dass meine schutzwürdigen Interessen nicht beeinträchtigt werden,
 - c) der Pflicht zur Vorlage vollständiger Zulassungsunterlagen zu genügen.
4. Ich erkläre mich damit einverstanden, dass meine Daten nach Beendigung oder Abbruch der Prüfung mindestens zehn Jahre aufbewahrt werden, wie es die Vorschriften über die klinische Prüfung von Arzneimitteln bestimmen. Danach werden meine personenbezogenen Daten gelöscht, soweit nicht gesetzliche, satzungsmäßige oder vertragliche Aufbewahrungsfristen entgegenstehen (*vertraglich vereinbarte Fristen müssen hier genannt werden*).
5. Ich bin über folgende gesetzliche Regelung informiert: Falls ich meine Einwilligung, an der Studie teilzunehmen, widerrufe, müssen alle Stellen, die meine personenbezogenen Daten, insbesondere Gesundheitsdaten, gespeichert haben, unverzüglich prüfen, inwieweit die gespeicherten Daten für die in Nr. 3 a) bis c) genannten Zwecke noch erforderlich sind.
Nicht mehr benötigte Daten sind unverzüglich zu löschen.
6. Ich bin damit einverstanden, dass mein Hausarzt

.....
Name

über meine Teilnahme an der klinischen Prüfung informiert wird (falls nicht gewünscht, bitte streichen).

Annex 7b
Best Practice Guide for Regulatory Affairs in a German CRO

**Ich erkläre mich bereit,
an der oben genannten klinischen Prüfung
freiwillig teilzunehmen.**

Ein Exemplar der Probanden-Information und -Einwilligung ~~(sofern zutreffend: sowie die
Versicherungsbedingungen)~~ sowie die **vollständigen Versicherungsunterlagen** habe ich
erhalten. Ein Exemplar verbleibt im Prüfzentrum.

.....
Name des Probanden in Druckbuchstaben

--	--

.....
Datum

.....
Unterschrift des **Probanden**

Ich habe das Aufklärungsgespräch geführt und die Einwilligung des Probanden eingeholt.

.....
Name des Prüfarztes/der Prüferärztin in Druckbuchstaben

.....
Datum

.....
Unterschrift des aufklärenden **Prüfarztes/der Prüferärztin**

Logo
und / oder
Adresse
der Prüfstelle

Prüfarzt: xxx

ERKLÄRUNGEN / BESTÄTIGUNGEN

Bestätigung, dass jeder Prüfer durch die für die pharmakologisch-toxikologische Prüfung verantwortlichen Wissenschaftler über deren Ergebnisse und die voraussichtlich mit der klinischen Prüfung verbundenen Risiken informiert worden ist

Ich bestätige hiermit, dass ich mich über die pharmakologisch-toxikologischen Ergebnisse und die voraussichtlich mit der klinischen Prüfung verbundenen Risiken informieren werde. Ich werde insbesondere die IB/SmPC/Fachinformationen der in der Studie eingesetzten Arzneimittel sowie den Prüfplan sorgfältig lesen, bevor ich mit studienbezogenen Tätigkeiten beginne.

Bestätigung, dass Studienteilnehmer über die Weitergabe ihrer pseudonymisierten Daten im Rahmen der Dokumentations- und Mitteilungspflichten nach § 12 und § 13 der GCP-Verordnung aufgeklärt werden; diese Bestätigung muss eine Erklärung enthalten, dass Studienteilnehmer, die der Weitergabe nicht zustimmen, nicht in die klinische Prüfung eingeschlossen werden

Ich bestätige hiermit, dass die Studienteilnehmer über die Weitergabe ihrer pseudonymisierten Daten aufgeklärt werden. Studienteilnehmer, die einer Weitergabe der Daten nicht zustimmen, werden nicht in die Studie eingeschlossen.

Erklärung zur Einhaltung des Datenschutzes

Ich erkläre hiermit, dass insbesondere durch Pseudonymisierung der Daten sichergestellt wird, dass die personenbezogenen Daten geschützt bleiben. Beim Umgang mit personenbezogenen Daten werden die Grundsätze des Datenschutzes beachtet.

Erklärung zur Einbeziehung möglicherweise vom Sponsor oder Prüfer abhängiger Personen

Ich erkläre hiermit, dass vom Sponsor oder Prüfer abhängige Personen grundsätzlich nicht in die klinische Studie eingeschlossen werden.

Angaben zu möglichen wirtschaftlichen und anderen Interessen der Prüfer im Zusammenhang mit den Prüfpräparaten

Ich bestätige hiermit, dass von Seiten des Prüfers keine wirtschaftlichen und andere Interessen im Zusammenhang mit den Prüfpräparaten bestehen.

Datum

Unterschrift Prüfarzt

Logo
and / or
address
of sponsor

Letter of Authorisation

Name, address of Sponsor, responsible for conduct of clinical trial Protocol Number xxx
(EudraCT Number: xxx), hereby authorizes

Name / Address of CRO

to act as an applicant on our behalf for the request for authorisation to the Competent Authority and for opinion of the Ethics Committees in the community in accordance with the national laws of Germany and also in accordance with Directive 2001/20/EC.

Name: xxx
Title: xxx

Date

Signature

Annex 10

Best Practice Guide for Regulatory Affairs in a German CRO

Bundesinstitut für Arzneimittel
und Medizinprodukte (BfArM)
Fachregistratur „Klinische Prüfungen“
Kurt-Georg-Kiesinger-Allee 3
53175 Bonn

**Antrag auf Genehmigung einer klinischen Prüfung bei der zuständigen
Bundesoberbehörde nach § 40 Abs. 1 Satz 2 AMG sowie § 7 GCP-V**

ttmmjjjj

EudraCT-Nr.:
Prüfplan-Code:
Titel



Sehr geehrte Damen und Herren,

hiermit bitten wir um Genehmigung zur Durchführung der oben genannten klinischen Prüfung.
Nachfolgend machen wir dazu folgende Angaben:

Sponsor:



Vertreter in der EU: falls zutreffend



Antragsteller im Auftrag des Sponsors:



Prüfstelle:



Hauptprüfer:



Labor:



alle beteiligten Labors nennen

Zuständige Ethikkommission:



Hinweise und Besonderheiten der klinischen Prüfung:

Besonderheiten nennen (DZ, Abs. 8)

**Plan zur Weiterbehandlung und medizinischen Betreuung der betroffenen
Personen nach dem Ende der klinischen Prüfung (§ 7 Abs. 2 Nr. 13 GCP-V):**

Behandlungsplan einfügen (DZ, Abs. 15)

Begründung für die Geschlechterverteilung:

Begründung nennen (DZ, Abs. 13)

Annex 10

Best Practice Guide for Regulatory Affairs in a German CRO

Bestätigungen:

Hiermit bestätigen wir, dass

- gemäß § 7 (2) 15 GCP-V betroffene Personen über die Weitergabe ihrer pseudonymisierten Daten im Rahmen der Dokumentations- und Mitteilungspflichten nach § 12 Abs. 4 und § 13 Abs. 1 GCP-V an die dort genannten Empfänger aufgeklärt werden, mit einer Erklärung darüber, dass betroffene Personen, die der Weitergabe nicht zustimmen, nicht in die klinische Prüfung eingeschlossen werden,
- gemäß § 5 (2) 2 GCP-V die Telefonnummer(n) des Sponsors und der CRO in Begleitdokumente (Patienteninformation / Patientenkarte) aufgenommen werden, **nur, wenn nicht auf Labeln enthalten**
- gemäß § 5 (2) 10 GCP-V der Prüfplancode zur Identifizierung der klinischen Prüfung, der Prüfstelle, des Prüfers und des Sponsors in Begleitdokumente (Patienteninformation / Patientenkarte) aufgenommen wird, **nur, wenn nicht auf Labeln enthalten**
- gemäß § 5 (2) 11 GCP-V die von der europäischen Datenbank vergebene EudraCT-Nummer in Begleitdokumente (Patienteninformation / Patientenkarte) aufgenommen wird, **nur, wenn nicht auf Labeln enthalten**
- gemäß § 5 (2) 12 GCP-V ein Identifizierungscode der betroffenen Person, und, sofern erforderlich, die Kennzeichnung der Einnahmesequenz, in Begleitdokumente (Patienteninformation / Patientenkarte) aufgenommen werden, **nur, wenn nicht auf Labeln enthalten**
- gemäß § 5(2)15 GCP-V die Prüfpräparate nicht an die Studienteilnehmer ausgehändigt werden und somit der Hinweis zur für Kinder unzugänglichen Aufbewahrung entfallen kann, **nur, wenn nicht auf Labeln enthalten und keine Abgabe erfolgt**
- gemäß § 5 (2)16 GCP-V die Prüfpräparate nicht an die Studienteilnehmer ausgehändigt werden und somit die Angaben für die Rückgabe entfallen können, **nur, wenn nicht auf Labeln enthalten und keine Abgabe erfolgt**
- ausschließlich Ärzte als Prüfer in dieser Studie eingesetzt werden.

Zur Beratung unseres Antrags senden wir Ihnen folgende Unterlagen in 4-facher Ausfertigung:

1. Anschreiben vom []
2. Antrag (CTA) vom [] mit Unterschriftsseite
3. Bestätigung der EudraCT-Nr.
4. Vollmacht des Sponsors
5. Prüfplan
 - a) Prüfplan, Version [] vom []
 - b) Unterschriften
6. Dossier zum Prüfpräparat
 - a) IMPD Non-Clinical
 - b) IMPD Clinical
 - c) IMPD Quality
 - d) IMPD Placebo
 - e) Benefits and Risks Assessment, Version [] vom []
 - f) TSE-Certificate
 - g) SUSAR Line Listing, Periode [] bis []
7. IB / Fachinformationen / SmPC
 - a) Investigator's Brochure Präparat, Edition [] vom []
 - b) Fachinformation Präparat, Stand []
 - c) Summary of Product Characteristics (SmPC) Präparat, Stand []
8. Labelentwürfe
 - a) Labelentwürfe der Prüfsubstanzen
 - b) Anmerkungen zum Labeling
 - c) Patientenkarte
9. Herstellungserlaubnis
 - a) Herstellungserlaubnis Name []
 - b) Herstellungs- und Einfuhrerlaubnis Name []
 - c) GMP Zertifikat Name []
 - d) Einfuhrerlaubnis Name []

ggf. Hinweis zur Herstellungserlaubnis:

Die Herstellungserlaubnis von [] wird beigefügt, da im Prüfzentrum [] **(Aktion beschreiben)**.
Die Freigabe der Prüfsubstanzen erfolgt durch [].

Annex 10

Best Practice Guide for Regulatory Affairs in a German CRO

ggf. Hinweis auf Studien mit gleicher Prüfmedikation:

xxx war bereits Gegenstand der genehmigten klinischen Prüfungen:

xxx (Vorlage-Nummer: xxx)

xxx ist außerdem Gegenstand der eingereichten klinischen Prüfungen:

xxx (Vorlage-Nummer: xxx)

Die in Papierform eingereichten Dokumente erhalten Sie gleichzeitig in elektronischer Form im xml- und pdf-Format auf CD-ROM. Wir bestätigen, dass beide Versionen identisch sind.

Für Rückfragen stehen wir Ihnen jederzeit gerne zur Verfügung.

Mit freundlichen Grüßen

Name

Regulatory Affairs Manager

Label für IMP

Interner Studien Code:	Probanden Nr.:
Protokoll-Nr.:	
Name des Arzneistoffs	
z.B. ☒ Tbl. à ☒ mg Arzneistoff oder Placebo	
Darreichungsform:	☒ Tabletten / Kapseln / Stück etc.
Dosierungsanleitung:	z B: täglich morgens eine Tablette vor der Mahlzeit einnehmen ☐ oder Dosierung gemäß Prüfplan
Ch.-B.:	Verwendbar bis:
Eudra-CT-Nummer:	
Lagerung: z.B. Trocken, unter 25°C, vor Licht schützen	
Für Kinder unzugänglich aufbewahren	
Zur klinischen Prüfung bestimmt	
Name und Anschrift , Tel Nr. des Sponsors und/oder der CRO und/oder des Prüfers: 	

**Anzeige einer klinischen Prüfung gemäß § 67 Abs. 1 und 3 AMG und
§ 12 Abs. 1-3 GCP-V bei der zuständigen Landesbehörde**

1. Vollständiger Titel des Prüfplans (einschl. Zielsetzung)

Prüfplancode		EudraCT-Nr.	

2. An (Name und Anschrift der zuständigen Behörde)

**3. Name (ggf. Firmenbezeichnung) und
Anschrift, Telefonnummer und E-Mailadresse
des Anzeigenden**

	Art der anzeigenden Einrichtung ☐ Prüfer (§ 12 GCP-V) ☐ Sponsor ☐ Vertreter des Sponsors ☐ Auftragsforschungsinstitut (CRO) ☐ Prüflaboratorium ☐ sonstiges: <u>Falls zutreffend:</u> ☐ Der Prüfer hat dem Sponsor die Durchführung der Anzeige bei der zuständigen Behörde gemäß §12(3) GCP-V übertragen.
---	--

4. Falls abweichend vom Anzeigenden gesonderte Rechnungsanschrift

Annex 12

Best Practice Guide for Regulatory Affairs in a German CRO

Anzeige einer klinischen Prüfung gemäß § 67 Abs. 1 und 3 AMG und § 12 Abs. 1-3 GCP-V bei der zuständigen Landesbehörde

5. Grund der Anzeige

☐ Anmeldung (s. Ziffer 1)

☐ Abmeldung der Gesamtstudie ^{*2}

☐ Abmeldung von
Prüfstellen gemäß Ziffer 6^{*2}

^{*2} Angabe des Abmeldedatums (Ziffer 14)

☐ Änderungsanzeige*

*Erläuterung zum Gegenstand der Änderungsanzeige (z.B. An-/ Abmeldung von Prüfern, genehmigungspflichtige Amendments, Studiendauer o.ä.):

■

■

■

6. Prüfer (Name und Berufsbezeichnung) und Prüfstellen im Zuständigkeitsbereich der Behörde zu Ziffer 2

(ggf. zusätzliche Auflistung als Anlage 6a beifügen)

6.1 Anschrift der Prüfstelle	Hauptprüfer	Weitere Prüfer
■	■	■
6.2 Anschrift der Prüfstelle	Hauptprüfer	Weitere Prüfer
■	■	■
6.3 Anschrift der Prüfstelle	Hauptprüfer	Weitere Prüfer
■	■	■
6.4 Anschrift der Prüfstelle	Hauptprüfer	Weitere Prüfer
■	■	■
6.5 Anschrift der Prüfstelle	Hauptprüfer	Weitere Prüfer
■	■	■
6.6 Anschrift der Prüfstelle	Hauptprüfer	Weitere Prüfer
■	■	■



Annex 12

Best Practice Guide for Regulatory Affairs in a German CRO

Anzeige einer klinischen Prüfung gemäß § 67 Abs. 1 und 3 AMG und § 12 Abs. 1-3 GCP-V bei der zuständigen Landesbehörde

7. Bezeichnung der zuständigen Bundesoberbehörde sowie Datum der Genehmigung

☐ Bundesinstitut für Arzneimittel und Medizinprodukte

☐ Paul-Ehrlich-Institut

Datum der Genehmigung

BfArM- bzw. PEI-Nummer

Daten von Genehmigungen nachträglicher Änderungen nach § 10 Abs. 1 GCP-V

Gegenstand der Änderung (Version, Amendment vom etc.)	Genehmigungsdatum	
	genehmigt am	
	genehmigt am	
	genehmigt am	
	genehmigt am	
	genehmigt am	

8. Bezeichnung und Anschrift der nach § 42 Abs. 1 Satz 1 oder 2 AMG zuständigen Ethikkommission

Datum der zustimmenden Bewertung:

Daten von Genehmigungen nachträglicher Änderungen nach § 10 Abs. 1 GCP-V

Gegenstand der Änderung (Version, Amendment vom etc.)	Genehmigungsdatum	
	genehmigt am	
	genehmigt am	
	genehmigt am	
	genehmigt am	
	genehmigt am	

9. Bei multizentrischer Prüfung Name und Anschrift des Leiters der klinischen Prüfung



Annex 12

Best Practice Guide for Regulatory Affairs in a German CRO

Anzeige einer klinischen Prüfung gemäß § 67 Abs. 1 und 3 AMG und § 12 Abs. 1-3 GCP-V bei der zuständigen Landesbehörde

10. Bezeichnung und Anschrift der für den Prüfer und die Prüfstelle zuständigen beteiligten Ethik-Kommission (ggf. zusätzliche Auflistung als Anlage 10a beifügen)			
Ziffer	Ethik-Kommission	Datum der zustimmenden Bewertung	
10.1		genehmigt am	
10.2		genehmigt am	
10.3		genehmigt am	
10.4		genehmigt am	
10.5		genehmigt am	
10.6		genehmigt am	

11. Name, Anschrift, Telefonnummer, E-Mailadresse und Ansprechpartner des Sponsors			
11.1 ggf. Name, Anschrift, Telefonnummer, E-Mailadresse und Ansprechpartner seines in der EU/EWR niedergelassenen Vertreters			
11.2 ggf. Name, Anschrift, Telefonnummer, E-Mailadresse und Ansprechpartner anderer eingebundener Einrichtungen (ggf. zusätzliche Auflistung als Anlage 11a beifügen)			
11.2.1		☐ CRO	☐ Labor ☐ Sonstiges
11.2.2		☐ CRO	☐ Labor ☐ Sonstiges
11.2.3		☐ CRO	☐ Labor ☐ Sonstiges
11.2.4		☐ CRO	☐ Labor ☐ Sonstiges



Annex 12

Best Practice Guide for Regulatory Affairs in a German CRO

Anzeige einer klinischen Prüfung gemäß § 67 Abs. 1 und 3 AMG und § 12 Abs. 1-3 GCP-V bei der zuständigen Landesbehörde

12. zu prüfendes Anwendungsgebiet

13. Art der klinischen Prüfung und ihrer Durchführung

Phase	
Art der klinischen Prüfung (Design)	
Durchführung	☐ monozentrisch ☐ multizentrisch
besondere Merkmale betroffener Personen (entspr. § 41 AMG)	

14. geplanter Beginn und voraussichtliches Ende der klinischen Prüfung

geplanter Beginn (Monat/Jahr)	a) in der/den Prüfstelle(n) nach Nr. 6	
	b) der Gesamtstudie im Geltungsbereich des AMG	
voraussichtliches Ende (Monat/Jahr)	a) in der/den Prüfstelle(n) nach Nr. 6	
	b) der Gesamtstudie im Geltungsbereich des AMG	
<u>Bei Abmeldungen:</u> Ende der Gesamtstudie bzw. der klinischen Prüfung in den unter Ziffer 6 aufgeführten Prüfstellen (Monat/Jahr)		

15. Bezeichnung, Stärke, Darreichungsform, arzneilich wirksame Bestandteile und Art der Anwendung des Prüfpräparates

Bezeichnung	
Stärke	
Darreichungsform	
Wirksame Bestandteile (ggf. Code)	
Art der Anwendung	

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Best Practice Guide for Regulatory Affairs in a German CRO

Anzeige einer klinischen Prüfung gemäß § 67 Abs. 1 und 3 AMG und § 12 Abs. 1-3 GCP-V bei der zuständigen Landesbehörde

16. Informationen, ob Regelungen des Betäubungsmittelrechts, des Gentechnikrechts oder des Strahlenschutzrechts zu beachten sind oder es sich um ein somatisches Gentherapeutikum oder Gendiagnostikum handelt

Das Prüfpräparat unterliegt Regelungen

☐ des BtM-Rechts ☐ des Strahlenschutzrechts ☐ des Gentechnikrechts

Das Prüfpräparat ist

☐ ein somatisches Gentherapeutikum ☐ Gendiagnostikum

17. Anzahl und Art der mitgeführten Vergleichspräparate

Anzahl

Art
(Bezeichnung, Darreichungsform)

18. Anzeige der Rekonstitution von Prüfpräparaten gemäß § 67 Abs. 1 AMG

Im Rahmen der Durchführung der klinischen Prüfung werden Prüfpräparate rekonstituiert: Ja ☐ Nein ☐

Falls ja: Name, Berufsbezeichnung und Anschrift der für die Rekonstitution verantwortlichen Person

Datum

Name in Blockschrift

Unterschrift

Annex 13

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Substantial Amendment Notification Form (Cf. Section 3.7.b of the *Detailed guidance on the request to the competent authorities for authorisation of a clinical trial on a medicinal product for human use, the notification of substantial amendments and the declaration of the end of the trial*¹)

NOTIFICATION OF A SUBSTANTIAL AMENDMENT TO A CLINICAL TRIAL ON A MEDICINAL PRODUCT FOR HUMAN USE TO THE COMPETENT AUTHORITIES AND FOR OPINION OF THE ETHICS COMMITTEES IN THE EUROPEAN UNION

For official use:

Date of receiving the request :	Grounds for non acceptance/ negative opinion : ☐ Date :
Date of start of procedure:	Authorisation/ positive opinion : ☐ Date :
Competent authority registration number of the trial: Ethics committee registration number of the trial :	Withdrawal of amendment application ☐ Date :

To be filled in by the applicant:

This form is to be used both for a request to the Competent Authority for authorisation of a **substantial** amendment and to an Ethics Committee for its opinion on a **substantial** amendment. Please indicate the relevant purpose in Section A.

A TYPE OF NOTIFICATION

A.1 Member State in which the substantial amendment is being submitted:

A.2 Notification for authorisation to the competent authority: ☐

A.3 Notification for an opinion to the ethics committee: ☐

B TRIAL IDENTIFICATION *(When the amendment concerns more than one trial, repeat this form as necessary.)*

B.1 Does the substantial amendment concern several trials involving the same IMP?² yes ☐ no ☐

B.1.1 If yes repeat this section as necessary.

B.2 Eudract number:

B.3 Full title of the trial :

B.4 Sponsor's protocol code number, version, and date:

C IDENTIFICATION OF THE SPONSOR RESPONSIBLE FOR THE REQUEST

C.1 Sponsor

- C.1.1 Organisation:
- C.1.2 Name of person to contact:
- C.1.3 Address :
- C.1.4 Telephone number :
- C.1.5 Fax number :
- C.1.6 e-mail:

C.2 Legal representative³ of the sponsor in the European Union for the purpose of this trial (if different from the sponsor)

- C.2.1 Organisation:
- C.2.2 Name of person to contact:
- C.2.3 Address :
- C.2.4 Telephone number :
- C.2.5 Fax number :
- C.2.6 e-mail:

¹ OJ, C82, 30.3.2010, p. 1; hereinafter referred to as 'detailed guidance CT-1'.

² Cf. Section 3.7. of the detailed guidance CT-1.

³ As stated in Article 19 of Directive 2001/20/EC.

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D APPLICANT IDENTIFICATION (please tick the appropriate box)

D.1 Request for the competent authority	
D.1.1 Sponsor	☐
D.1.2 Legal representative of the sponsor	☐
D.1.3 Person or organisation authorised by the sponsor to make the application.	☐
D.1.4 Complete below:	
D.1.4.1 Organisation :	
D.1.4.2 Name of person to contact :	
D.1.4.3 Address :	
D.1.4.4 Telephone number :	
D.1.4.5 Fax number :	
D.1.4.6 E-mail	

D.2 Request for the Ethics Committee	
D.2.1 Sponsor	☐
D.2.2 Legal representative of the sponsor	☐
D.2.3 Person or organisation authorised by the sponsor to make the application.	☐
D.2.4 Investigator in charge of the application if applicable ⁴ :	
• Co-ordinating investigator (for multicentre trial)	☐
• Principal investigator (for single centre trial):	☐
D.2.5 Complete below	
D.2.5.1 Organisation :	
D.2.5.2 Name :	
D.2.5.3 Address :	
D.2.5.4 Telephone number :	
D.2.5.5 Fax number :	
D.2.6 E-mail :	

E SUBSTANTIAL AMENDMENT IDENTIFICATION

E.1 Sponsor's substantial amendment code number, version, date for the clinical trial concerned: ()
--

E.2 Type of substantial amendment	
E.2.1 Amendment to information in the CT application form	yes ☐ no ☐
E.2.2 Amendment to the protocol	yes ☐ no ☐
E.2.3 Amendment to other documents appended to the initial application form	yes ☐ no ☐
E.2.3.1 If yes specify:	
E.2.4 Amendment to other documents or information:	yes ☐ no ☐
E.2.4.1 If yes specify:	
E.2.5 This amendment concerns mainly urgent safety measures already implemented ⁵	yes ☐ no ☐
E.2.6 This amendment is to notify a temporary halt of the trial ⁶	yes ☐ no ☐
E.2.7 This amendment is to request the restart of the trial ⁷	yes ☐ no ☐

E.3 Reasons for the substantial amendment:	
E.3.1 Changes in safety or integrity of trial subjects	yes ☐ no ☐
E.3.2 Changes in interpretation of scientific documents/value of the trial	yes ☐ no ☐
E.3.3 Changes in quality of IMP(s)	yes ☐ no ☐
E.3.4 Changes in conduct or management of the trial	yes ☐ no ☐
E.3.5 Change or addition of principal investigator(s), co-ordinating investigator	yes ☐ no ☐
E.3.6 Change/addition of site(s)	yes ☐ no ☐
E.3.7 Other change	yes ☐ no ☐
E.3.7.1 If yes, specify:	

⁴ According to national legislation.

⁵ Cf. Section 3.9. of the detailed guidance CT-1.

⁶ Cf. Section 3.10. of the detailed guidance CT-1.

⁷ Cf. Section 3.10. of the detailed guidance CT-1.

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E.3.8	Other case	yes ☐ no ☐
E.3.8.1	If yes, specify	
E.3.8.2		

E.4	Information on temporary halt of trial⁸	
E.4.1	Date of temporary halt	(YYYY/MM/DD)
E.4.2	Recruitment has been stopped	yes ☐ no ☐
E.4.3	Treatment has been stopped	yes ☐ no ☐
E.4.4	Number of patients still receiving treatment at time of the temporary halt in the MS concerned by the amendment ()	
E.4.5	Briefly describe (free text):	
	- Justification for a temporary halt of the trial - The proposed management of patients receiving treatment at time of the halt (<i>free text</i>).	
	The consequences of the temporary halt for the evaluation of the results and for overall risk benefit assessment of the investigational medicinal product (<i>free text</i>).	

F DESCRIPTION OF EACH SUBSTANTIAL AMENDMENT⁹ (free text):

Previous and new wording in track change modus	New wording	Comments/explanation/reasons for substantial amendment

G CHANGE OF CLINICAL TRIAL SITE(S)/INVESTIGATOR(S) IN THE MEMBER STATE CONCERNED BY THIS AMENDMENT

G.1	Type of change
G.1.1	Addition of a new site
G.1.1.1	Principal investigator (provide details below)
G.1.1.1.1	Given name
G.1.1.1.2	Middle name (if applicable)
G.1.1.1.3	Family name
G.1.1.1.4	Qualifications (MD.....)
G.1.1.1.5	Professional address
G.1.2	Removal of an existing site
G.1.2.1	Principal investigator (provide details below)
G.1.2.1.1	Given name
G.1.2.1.2	Middle name (if applicable)
G.1.2.1.3	Family name
G.1.2.1.4	Qualifications (MD.....)
G.1.2.1.5	Professional address
G.1.3	Change of co-ordinating investigator (provide details below of the new coordinating investigator)
G.1.3.1	Given name
G.1.3.2	Middle name
G.1.3.3	Family name
G.1.3.4	Qualification (MD.....)
G.1.3.5	Professional address
G.1.3.6	Indicate the name of the previous co-ordinating investigator:
G.1.4	Change of principal investigator at an existing site (provide details below of the new principal investigator)
G.1.4.1	Given name
G.1.4.2	Middle name
G.1.4.3	Family name
G.1.4.4	Qualifications (MD.....)
G.1.4.5	Professional address
G.1.4.6	Indicate the name of the previous principal investigator:

⁸ Cf. Section 3.10. of the detailed guidance CT-1.

⁹ Cf. Section 3.7.c. of the detailed guidance CT-1. The sponsor may submit this documentation on a separate sheet.

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H CHANGE OF INSTRUCTIONS TO CA FOR FEEDBACK TO SPONSOR

H.1	Change of e-mail contact for feedback on application*	
H.2	Change to request to receive an .xml copy of CTA data	☐ yes ☐ no
H.2.1	Do you want a .xml file copy of the CTA form data saved on EudraCT?	☐ yes ☐ no
H.2.1.1	If yes provide the e-mail address(es) to which it should be sent (up to 5 addresses):	
H.2.2	Do you want to receive this via password protected link(s) ¹⁰ ?	☐ yes ☐ no
If you answer no to question H.2.2 the .xml file will be transmitted by less secure e-mail link(s)		
H.2.3	Do you want to stop messages to an email for which they were previously requested?	☐ yes ☐ no
H.2.3.1	If yes provide the e-mail address(es) to which feedback should no longer be sent:	
(*This will only come into effect from the time at which the request is processed in EudraCT).		

I LIST OF THE DOCUMENTS APPENDED TO THE NOTIFICATION FORM (cf. Section 3.7 of detailed guidance CT-1)

Please submit only relevant documents and/or when applicable make clear references to the ones already submitted. Make clear references to any changes of separate pages and submit old and new texts. Tick the appropriate box(es).

I.1	Cover letter	☐
I.2	Extract from the amended document in accordance with Section 3.7.c. of detailed guidance CT-1 (if not contained in Part F of this form)	☐
I.3	Entire new version of the document¹¹	☐
I.4	Supporting information	☐
I.5	Revised .xml file and copy of initial application form with amended data highlighted	☐
I.6	Comments on any novel aspect of the amendment if any :	

J SIGNATURE OF THE APPLICANT IN THE MEMBER STATE

J.1	I hereby confirm that/ confirm on behalf of the sponsor that (delete which is not applicable) • The above information given on this request is correct; • The trial will be conducted according to the protocol, national regulation and the principles of good clinical practice; and • It is reasonable for the proposed amendment to be undertaken.
------------	--

J.2	APPLICANT OF THE REQUEST FOR THE COMPETENT AUTHORITY (as stated in section D.1): ☐
J.2.1	Signature ¹² :
J.2.2	Print name :
J.2.3	Date :

J.3	APPLICANT OF THE REQUEST FOR THE ETHICS COMMITTEE (as stated in section D.2): ☐
J.3.1	Signature ¹³ :
J.3.2	Print name:
J.3.3	Date :

¹⁰ This requires a EudraLink account. (See <https://eudract.ema.europa.eu/> for details)

¹¹ Cf. Section 3.7.c. of the detailed guidance CT-1.

¹² On an application to the Competent Authority only, the applicant to the Competent Authority needs to sign.

¹³ On an application to the Ethics Committee only, the applicant to the Ethics Committee needs to sign.

Beschluss 4

Versand von Amendments bei multizentrischen Studien

(Stand 12.11.2005, in der auf Grund der Beschlüsse der 9. Sommertagung am 14.Juni 2008 geänderten Fassung)

Bewertungspflichtige nachträgliche Änderungen (Substantial Amendments)

Verfahren

Unterlagen zu bewertungspflichtigen nachträglichen Änderungen (Definition siehe GCP-V § 10 Abs. 1) sendet der Antragsteller zur Bewertung zeitgleich an die federführende und an die beteiligten Ethik-Kommissionen (jeweils max. 2x Hard Copy und 1x elektronisch).

Änderungen von Prüfern in einer Prüfstelle

„Die Änderung des Leiters der klinischen Prüfung, des Hauptprüfers oder des einzigen Prüfers in einer Prüfstelle oder die Meldung zusätzlicher Prüfer sind bewertungspflichtige, nachträgliche Änderungen (GCP-V § 3 Abs. 2c und § 10 Abs. 1 Ziffer 3).“

Nichtbewertungspflichtige nachträgliche Änderungen (Non-Substantial Amendments)

- Unterlagen zu nichtbewertungspflichtigen nachträglichen Änderungen gehen nur an die federführende Ethik-Kommission (1x Papierversion und 1x elektronische Version).
- Nichtbewertungspflichtige nachträgliche Änderungen sind gemäß EU-Guidances (ENTR/CT1 Kap. 4.2.2 und ENTR/CT2 Kap. 6.2.1) nicht vorlagepflichtig. Sie sind jedoch sorgfältig zu dokumentieren und beim Sponsor und der Prüfstelle zu archivieren. Die Ethik-Kommission kann jederzeit die Vorlage anfordern.
- Der Arbeitskreis der Ethik-Kommissionen fordert immer die Vorlage folgender nichtbewertungspflichtiger nachträglicher Änderungen an:
 - Änderungen in Unterlagen, die sich an die Studienteilnehmer richten (Informationsschriften, Fragebogen, etc.)

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Declaration of the End of Trial Form (cf. Section 4.2.1 of the *Detailed guidance on the request to the competent authorities for authorisation of a clinical trial on a medicinal product for human use, the notification of substantial amendments and the declaration of the end of the trial*¹)

NOTIFICATION OF THE END OF A CLINICAL TRIAL OF A MEDICINE FOR HUMAN USE TO THE COMPETENT AUTHORITY AND THE ETHICS COMMITTEE
--

For official use

Date of receipt :	Competent authority registration number : Ethics committee registration number:
-------------------	--

To be filled in by the applicant

A MEMBER STATE IN WHICH THE DECLARATION IS BEING MADE :

B TRIAL IDENTIFICATION

B.1 EudraCT number :	(..)
B.2 Sponsor's protocol code number:	(..)
B.3 Full title of the trial :	

C APPLICANT IDENTIFICATION (please tick the appropriate box)

C.1 DECLARATION FOR THE COMPETENT AUTHORITY	☐
C.1.1 Sponsor	☐
C.1.2 Legal representative of the sponsor	☐
C.1.3 Person or organisation authorised by the sponsor to make the application.	☐
C.1.4 Complete below:	
C.1.4.1 Organisation :	
C.1.4.2 Name of person to contact :	
C.1.4.3 Address :	
C.1.4.4 Telephone number :	
C.1.4.5 Fax number :	
C.1.4.6 E-mail	

C.2 DECLARATION FOR THE ETHICS COMMITTEE	☐
C.2.1 Sponsor	☐
C.2.2 Legal representative of the sponsor	☐
C.2.3 Person or organisation authorised by the sponsor to make the application.	☐
C.2.4 Investigator in charge of the application if applicable ² :	
• Co-ordinating investigator (for multicentre trial):	☐
• Principal investigator (for single centre trial):	☐
C.2.5 Complete below :	
C.2.5.1 Organisation:	
C.2.5.2 Name :	
C.2.5.3 Address :	
C.2.5.4 Telephone number :	
C.2.5.5 Fax number :	
C.2.5.6 E-mail :	

D END OF TRIAL

D.1 Date of the end of the complete trial in all countries concerned by the trial?	
D.1.1 (YYYY/MM/DD):	

¹ OJ, C82, 30.3.2010, p. 1; hereinafter referred to as 'detailed guidance CT-1'.

² According to national legislation.

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D.2	Is it an early termination?³	yes ☐ no ☐
D.2.1	If yes, give date (YYYY/MM/DD):	
D.2.2	Briefly describe in an annex (free text):	
D.2.2.1	The justification for early termination of the trial;	
D.2.2.2	Number of patients still receiving treatment at time of early termination in the MS concerned by the declaration and their proposed management;	
D.2.2.3	The consequences of early termination for the evaluation of the results and for overall risk benefit assessment of the investigational medicinal product.	

E SIGNATURE OF THE APPLICANT IN THE MEMBER STATE

E.1	I hereby confirm that/confirm on behalf of the sponsor that (delete which is not applicable): - The above information given on this declaration is correct; and - That the clinical trial summary report will be submitted within the applicable deadlines in accordance with the applicable guidance by the Commission.⁴
------------	--

E.2	APPLICANT TO THE COMPETENT AUTHORITY (as stated in C.1)	☐
E.2.1	Date :	
E.2.2	Signature :	
E.2.3	Print name:	

E.3	APPLICANT TO THE ETHICS COMMITTEE (as stated in C.2) :	☐
E.3.1	Date :	
E.3.2	Signature :	
E.3.3	Print name:	

³ Cf. Section 4.2. of the detailed guidance CT-1.

⁴ Section 4.3. of the detailed guidance CT-1.