ClinicalTrials.gov and Addressing Challenges in Finding Evidence

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Evidence Based Regulatory Decision Making

Requires access to all relevant evidence

- Not just those data submitted by a sponsor
- Not just those analyses submitted by a sponsor

Barriers to complete access to evidence:

- Missing (invisible) trials or other studies
- Unreported or changed outcome measures
- Unreported (or obscured) AEs
- Incomplete or changed analyses

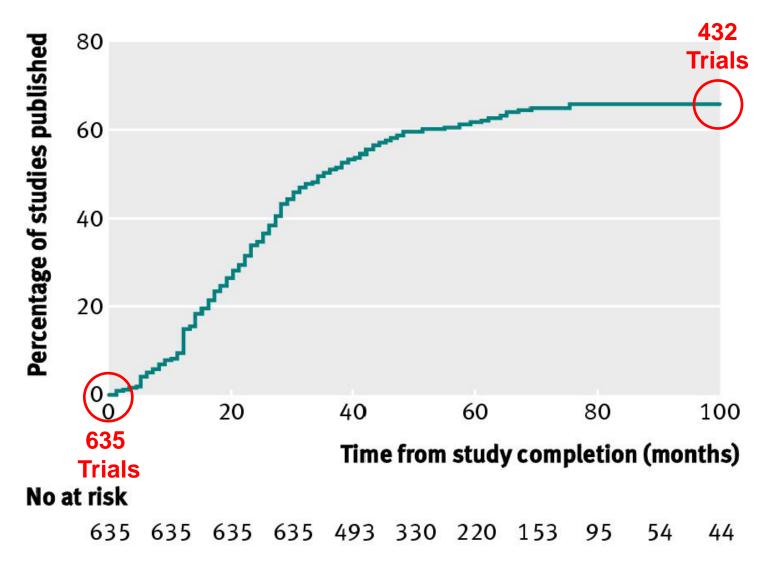
Systematic, Searchable Sources of Data (Beyond those submitted by sponsor)

- PubMed
- ClinicalTrials.gov
- Other registries

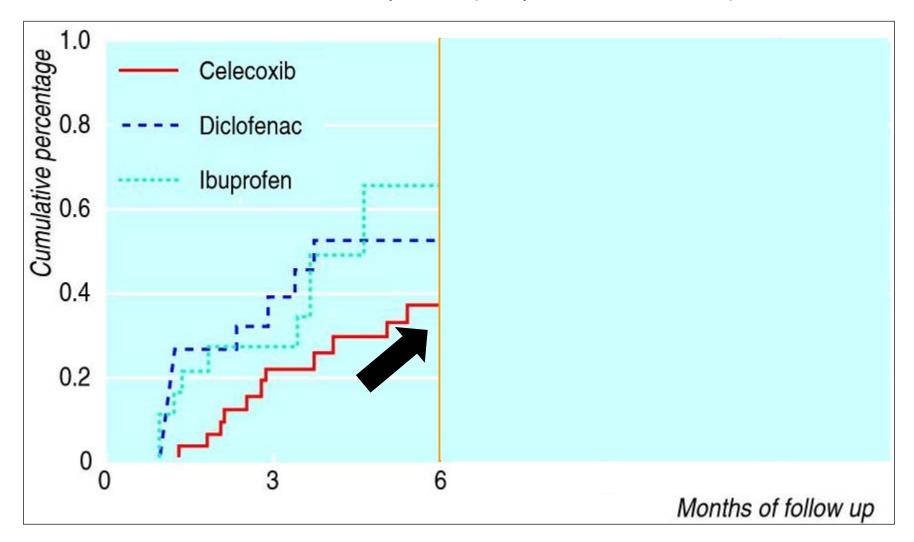
Problems with Published Literature

- Missing many trials
- Incomplete reporting of trials that are published
 - Prespecified outcome measures may be omitted
 - AEs omitted
- Lack of fidelity to protocol for some analyses;
 e.g.
 - Unacknowledged changes to outcome measures
 - Deviations from analysis plan

Fig 2 Cumulative percentage of studies published in a peer reviewed biomedical journal indexed by MEDLINE during 100 months after trial completion among all NIH funded clinical trials registered within ClinicalTrials.gov



Kaplan-Meier estimates for ulcer complications according to traditional definition. Results are truncated after 12 months, no ulcer complications occurred after this period. (Adapted from Lu 2001.)



Trial Registration and Results Reporting

- Registration (prior to trial initiation)
 - Public list of all relevant trials with key protocol details
- Results Reporting
 - Structured, curated summary data
 - Ensures minimum data set: (participant flow, baseline characteristics, prespecified outcome measures, AEs)
 - Independent of journal publication

ClinicalTrials.gov

- Registry: Over 160,000 studies
 - 500 new studies/week
 - 18% (over 29,000) observational studies
- Results database: Over 11,000 studies
 - 100 new sets of results/week
- International in scope
 - Fewer than half are in US only
- All phases, all study models, all intervention types

Content of ClinicalTrials.gov Record

- One record per trial
- Registration section
 - Submitted at trial initiation
 - Summarizes information from trial protocol
 - Condition
 - Interventions
 - Outcomes
 - Design, etc
 - Includes recruitment information (e.g., eligibility, locations)

- Results section
 - Submitted after trial completion
 - Summarizes trial results
 - Participant flow
 - Baseline characteristics
 - Outcome measures (including statistical analyses)
 - Adverse events

Key Policies

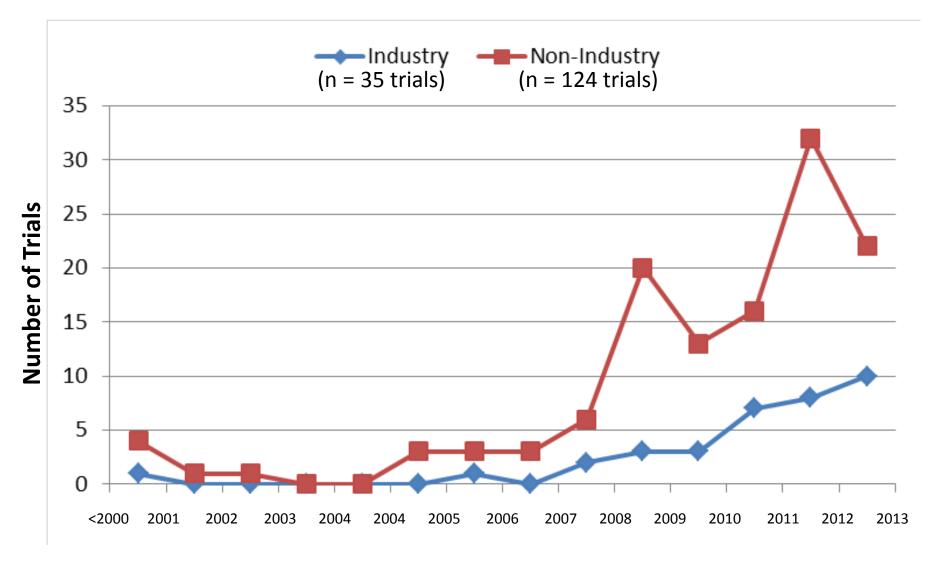
- ICMJE (Registration only)
 - Interventional trials
 - All intervention types
 - All phases; all jurisdictions; enforced by journal editors
- FDAAA (Registration and Results)
 - Interventional trials
 - Drugs, biologics, devices
 - Not phase 1
 - US FDA jurisdiction (e.g., IND/IDE or US site)
 - Specific enforcement mechanisms
- EMA (Registration and Results)

"Invisible" Trials

- Not all trials legally required to register
 - E.g., non-IND studies with no US sites
- Registration only helps if there is an accessible, searchable database
- Features of search engine determine the utility
 - Even best search engines have challenges with drug and device names, other features of trials
- Many registries around the world
 - Varying quality of search engines
 - No systematic de-duplication

Not All Trials are Registered

Number of Trials First Registered in 2014 at ClinicalTrials.gov and Listed as "Completed" or "Terminated" by Start Year



Not All Registered Trials Can Be Found

Drug Serial #s = "Hidden" Trials ClinicalTrials.gov Gardasil® Search

Gardasil® was approved on June 8, 2006

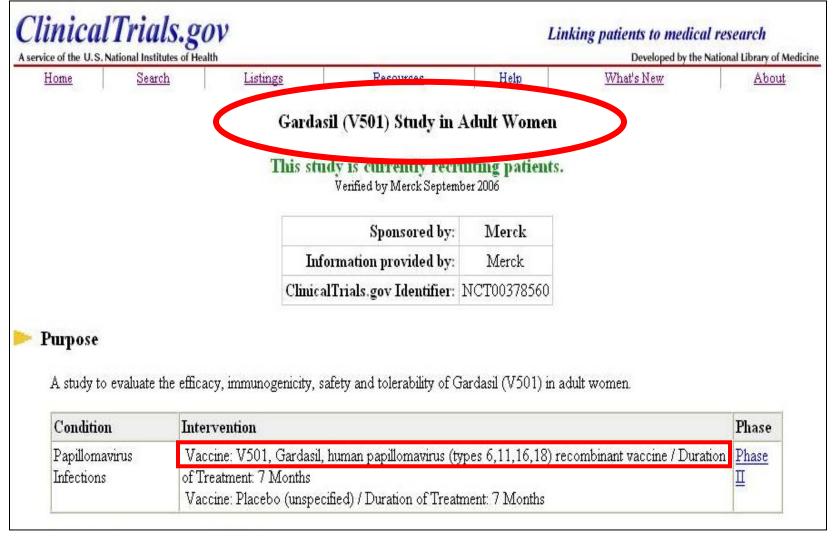


PubMed Gardasil® Search

One month after approval (and promotion)



Study NCT00378560



Names/Identifiers Are Critical

 Search engines depend on known names, lists of synonyms, and hierarchies: e.g., Paxil

```
    Aropax
    Asimia
    brl-29060
    fg-7051
    Ldmp
    Paroxetine
    Pexeva
    Seroxat
```

- "Code" names, without "de-coders," lead to "hidden" trials
- Non-specific names may also prevent the search engine from retrieving a useful list of trials
- Biologic, device, and other irregular intervention names challenge the system:
 - Vaccine: ALVAC-HIV MN120TMG (vCP205)
 - Device: IT LEISH (rK39); Device: galyfilcon AP 8.3 BC; Device: BD/33G

Naming Drugs

- After Approval
 - Generic name (USAN, USP), links to chemical structure
- Before Approval
 - Chemical structure (name, drawing)
 - Company serial number
 - No public record or oversight
 - No guaranteed one-to-one correspondence

Does the Search Engine Enable You to Find the Trials You Want?

- Spelling correction and relaxation of search terms
- Use of synonymy
- Fielded search
- Use of hierarchy from MeSH
- Relevancy ranking

There Are Many Trial Registries of Varying Quality

Insufficient Coordination Leads to "World Chaos"

Protocol Registration Status



Mandatory for Registrant to Post (in effect)	Non-voluntary Post by EC or Government (in effect)	Mandatory for Registrant to Post (pending)	Non-voluntary Post by EC or Government (pending)	Legislation / Regulations (ongoing activity)	Voluntary Registry (in effect)
ArgentinaReNIS Austria NIS1 Brazil2 Euro. UnionEU PAS India Israel3 Malaysia New Zealand4 Philippines5 South Africa Taiwan	Argentina ^{EFC} Chile Colombia ⁶ Czech Republic Euro. Union ^{EU CTR} France Germany ^{PharmNet.Bund} Korea ^{MFDS} Netherlands ^{CCMO} Norway Peru	Kenya Mexico Switzerland ⁸	Croatia ItalyIntegrated Platform Spain ⁹ Zimbabwe	Canada China Poland	Africa Australia/New Zland China ^{CFDA} China ^{ChiCTR} Cuba Euro. Union ^{ENCePP} Germany ^{DRKS} Hong Kong Iran Japan Korea ^{CRIS}
United States	Russia Serbia Singapore Slovakia ⁷ Venezuela	It is not guaranteed	ges since April 2012		Netherlands ^{NTR} Poland ^{INFARMA} Sri Lanka Taiwan PMS ¹⁰ Tanzania ¹¹ Thailand United Kingdom ¹²

¹ Non-interventional studies

² Register Phase 1 - 4 trials in ReBEC

³ Register in ClinicalTrials.gov

⁴ Required for ethics approval (WHO/CTgov)

⁵ Register Phase 1 - 4 trials in PHRR

⁶ Posts PDF lists of trials

⁷ Replaced database with PDF file

⁸ In any WHO/ICMJE registry <u>plus</u> national database

⁹ NCA loads XML; sponsor adds summary

¹⁰ Post-marketing studies

¹¹ In public user test phase (since Jul 2011)

¹² NRES, ISRCTN, and PROSPERO



Home Advanced Search Search Tips UTN ▶ ICTRP website ▶ Contact us

Example: liver cancer OR breast cancer NOT genetic

Search Search tips

Welcome

- The Clinical Trials Search Portal provides access to a central database containing the trial registration data sets provided by the registries listed on the right. It also provides links to the full original records.
- To facilitate the unique identification of trials, the Search Portal bridges (groups together) multiple records about the same trial.
 More information
- Please note: This Search Portal is not a clinical trials registry. How to register a trial
- For mobile users, please use this link http://apps.who.int/trialsearch/ictrpmob.aspx. It can be opened from any smartphone
- It is now possible to export the results of the search into XML. More information
- Crawling the ICTRP database now requires a username/password.
 To request access to the crawling pages please send an email to ictrpinfo@who.int

Data Providers

Data sets from <u>data providers</u> are updated every Tuesday evening according to the following schedule: Every week:

- . Australian New Zealand Clinical Trials Registry, last data file imported on 3 February 2014
- ClinicalTrials.gov, last data file imported on 3 February 2014
- EU Clinical Trials Register (EU-CTR), last data file imported on 3 February 2014
- ISRCTN, last data file imported on 3 February 2014

Every 4 weeks:

- Brazilian Clinical Trials Registry (ReBec), last data file imported on 3 February 2014
- Chinese Clinical Trial Registry, last data file imported on 2 February 2014
- Clinical Trials Registry India, last data file imported on 3 February 2014
- Clinical Research Information Service Republic of Korea, last data file imported on 3 February 2014
- . Cuban Public Registry of Clinical Trials, last data file imported on 3 February 2014
- . German Clinical Trials Register, last data file imported on 3 February 2014
- Iranian Registry of Clinical Trials, last data file imported on 2 February 2014
- Japan Primary Registries Network, last data file imported on 2 February 2014
- Pan African Clinical Trial Registry, last data file imported on 3 February 2014
- Sri Lanka Clinical Trials Registry, last data file imported on 2 February 2014
- The Netherlands National Trial Register, last data file imported on 3 February 2014
- *New* Thai Clinical Trials Register (TCTR), last data file imported on 3 February 2014

88 Registered Clinical Studies of Tysabri:

ClinicalTrials.gov & WHO Search Portal

WHO Search Portal Search

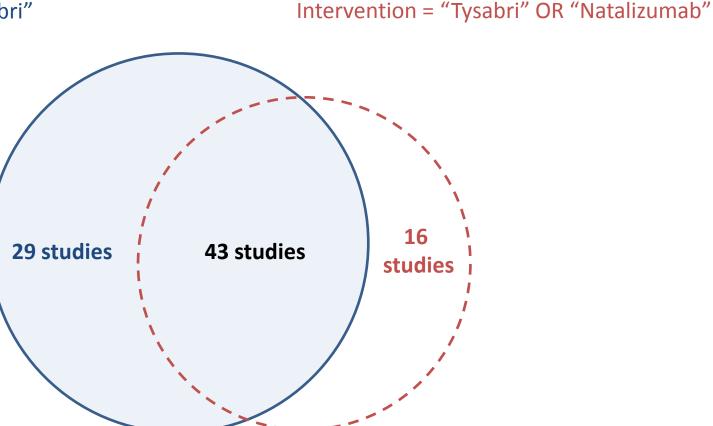
ClinicalTrials.gov Search

Intervention = "Tysabri"

Synonyms Searched:

Natalizumab

- Antegren
- Anti-vla4



Names for 3 SSRI Drugs Recognized by ClinicalTrials.gov Search Engine

Zoloft

- Altruline
- Aremis
- Besitran
- Gladem
- Lustral
- Sealdin
- Sertraline

Prozac

- Fluoxetine
- Lilly 110140
- Rapiflux
- Reconcile
- Sarafem
- Selfemra

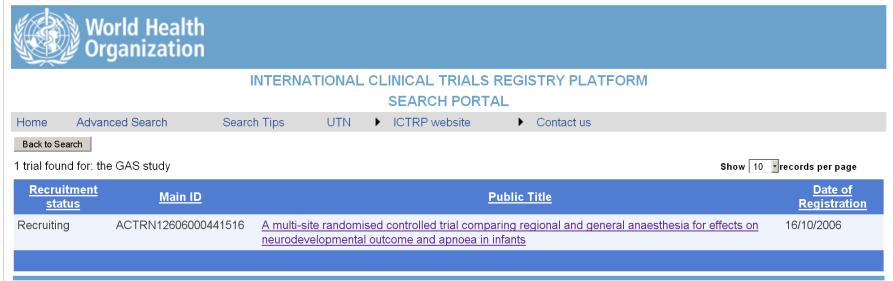
Paxil

- Aropax
- Asimia
- Brisdelle
- brl-29060
- fg 7051
- Ldmp
- Paroxetine
- Pexeva
- Seroxat

Case Study – the GAS Study

- Registered in (at least) three registries
 - ISRCTN, ClinicalTrials.gov, ANZCTR
- Three different PIs (US, UK, Aus); three different "sponsors."
- ANZCTR and ClinicalTrials.gov records have same title; ISRCTN lists ANZCTR as secondary ID
- WHO portal lists two records, but does not recognize them as duplicates; does not have the ISRCTN record

On WHO Portal Site: Basic Search for "The GAS Study"



Disclaimer: Trials posted on this search portal are not endorsed by WHO, but are provided as a service to our users. In no event shall the World Health Organization be liable for any damages arising from the use of the information linked to in this section. None of the information obtained through use of the search portal should in any way be used in clinical care without consulting a physician or licensed health professional. WHO is not responsible for the accuracy, completeness and/or use made of the content displayed for any trial record.

Copyright - World Health Organization - Version 3.2 - Version history

On WHO Portal Site: Title Field Search for "Neurodevelopmental Outcome"



Problems with Published Studies

- Incomplete reporting of Outcome Measures
 - Unacknowledged changes
 - Omissions
- Unacknowledged changes to Analysis Population
 - "missing participants"
- Incomplete reporting of AEs, e.g.,
 - Only "attributable" or "clinically significant"

Brief Descriptive Title of Clinical Trial

Study Recruitment Status Information provided by Organization

Study Type: Study Design: Interventions:

Randomized, Double Masked, Placebo Control, Parallel Assignment Drug: Drug A; Drug: Drug B

Participant Flow

Recruitment Details - Key information relevant to the recruitment process for the overall study, such as dates of the recruitment. Pre-Assignment Detail - Significant events and approaches for the overall study following participant enrollment, but prior to assignment

Overall Study

Overall Study				
	Drug A	Drug B	Placebo	
STARTED				
COMPLETED				
Not Completed				
Lost to Follow-up				
Adverse Event				

Baseline Characteristics

Daseline Characteristics				
	Drug A	Drug B	Placebo	Total
Number of Participants				
Age				
Gender				
Female				
Male				

Outcome Measures **Primary Outcome Measure**

Measure Name	
Measure Description	
Time Frame	

Population Description - Explanation of how the number of participants for analysis was determined. Measured Values

	Drug A	Drug B	Placebo
Number of Subjects			
Primary Outcome Measure			

Statistical Analysis for Primary Outcome Measure

	,
Groups	
Method	
P-Value	
Mean Difference	
95% Confidence Interval	

Additional Details About the Analysis - e.g., null hypothesis, power calculation, and whether the p-value is adjusted for multiple comparisons

More Information

Certain Agreements - Information about restrictions on the ability of the principal investigator to disseminate trial data after trial completion Limitations and Caveats - Limitations of the study, such as early termination leading to small numbers of subjects analyzed Results Point of Contact - Phone and/or email for additional information about the results

4 Scientific Modules

- Participant Flow
- Baseline **Characteristics**
- **Outcome Measures**
- Adverse Events
- Other, including "Certain Agreements"

Collapse Section

Serious Adverse Events

	Intravitreal Aflibercept Injection (IAI) (Baseline to Week 24)	Sham Treatment (Baseline to Week 24)	IAI to IAI (Week 24 to Week 100)	Sham Treatment to IAI (Week 24 to Week 100)
Total # participants affected/at risk	6/114 (5.26%)	6/74 (8.11%)	20/110 (18.18%)	14/60 (23.33%)
Blood and lymphatic system disorders				
Anaemia * A [1]				
# participants affected/at risk	1/114 (0.88%)	0/74 (0%)	0/110 (0%)	1/60 (1.67%)
Neutropenia * A [2]				
# participants affected/at risk	0/114 (0%)	0/74 (0%)	0/110 (0%)	1/60 (1.67%)
Pernicious anaemia * A [3]				
# participants affected/at risk	0/114 (0%)	0/74 (0%)	0/110 (0%)	1/60 (1.67%)
Cardiac disorders				
Acute myocardial infarction * A [4]				
# participants affected/at risk	0/114 (0%)	1/74 (1.35%)	0/110 (0%)	0/60 (0%)

- * Indicates events were collected by non-systematic methods.
- A Term from vocabulary, MedDRA Version 13.1
- [1] Non-Ocular AE
- [2] Non-Ocular AE
- [3] Non-Ocular AE
- [4] Non-Ocular AE



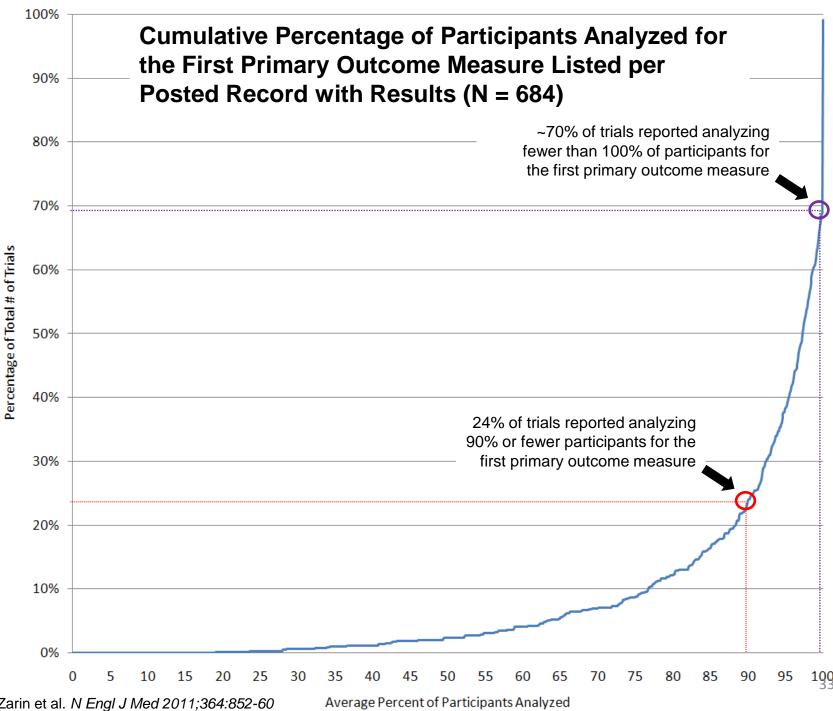
Timing and Completeness of Trial Results Posted at ClinicalTrials.gov and Published in Journals

Carolina Riveros^{1,2,3}, Agnes Dechartres^{1,2,3*}, Elodie Perrodeau^{1,3}, Romana Haneef^{1,3}, Isabelle Boutron^{1,2,3,4}, Philippe Ravaud^{1,2,3,4,5}

1 INSERM U738, Paris, France, 2 Université Paris Descartes—Sorbonne Paris Cité, Paris, France, 3 Centre d'Épidémiologie Clinique, Hôpital Hôtel-Dieu, Assistance Publique-Hôpitaux de Paris, Paris, France, 4 French Cochrane Centre, Paris, France, 5 Mailman School of Public Health, Columbia University, New York, New York, United States of America

Findings: "Reporting was significantly more complete at ClinicalTrials.gov than in the published article for the flow of participants (64% versus 48% of trials, p,0.001), efficacy results (79% versus 69%, p = 0.02), adverse events (73% versus 45%, p,0.001), and serious adverse events (99% versus 63%, p,0.001)."

Conclusions: "Our results highlight the need to search ClinicalTrials.gov for both unpublished and published trials. Trial results, especially serious adverse events, are more completely reported at ClinicalTrials.gov than in the published article."



Open Access Research



Haphazard reporting of deaths in clinical trials: a review of cases of ClinicalTrials.gov records and matched publications—a cross-sectional study

Amy Earley, 1 Joseph Lau, 2 Katrin Uhlig, 1,3

To cite: Earley A, Lau J, Uhlig, K. Haphazard reporting of deaths in clinical trials: a review of cases of ClinicalTrials.gov records and matched publications—a cross-sectional study. BMJ Open 2013;3:e001963. doi:10.1136/bmjopen-2012-001963

► Prepublication history and additional material for this paper are available online. To view these files please visit the journal online (http://dx.doi.org/10.1136/bmjopen-2012-001963).

ABSTRACT

Context: A participant death is a serious event in a clinical trial and needs to be unambiguously and publicly reported.

Objective: To examine (1) how often and how numbers of deaths are reported in ClinicalTrials.gov records; (2) how often total deaths can be determined per arm within a ClinicalTrials.gov results record and its corresponding publication and (3) whether counts may be discordant.

Design: Registry-based study of clinical trial results reporting.

Setting: ClinicalTrials.gov results database searched in July 2011 and matched PubMed publications.

Selection criteria: A random sample of ClinicalTrials. gov results records. Detailed review of records with a single corresponding publication.

ARTICLE SUMMARY

Article focus

 We hypothesised that the lack of clear expectations for reporting all deaths in clinical trials give rise to discrepancies in the number of deaths reported across reports of a trial.

Key message

There is a lack of clarity, consistency and agreement in reporting of deaths in clinical trials which highlights the need for unambiguous templates to standardise reporting of total number of deaths per arm in ClinicalTrials.gov records and more explicit reporting guidelines for peerreviewed publications.

Strengths and limitations of this study

Some Suggestions

- Enforce registration and use NCT # in communications
- Ask sponsors for listings of all trials, along with registration numbers
- Signal seriousness of registration details; follow-up on discrepancies
- Consider methods of disseminating "code names" and other informal naming conventions

Unambiguous Identification of Obesity Trials Weight-Loss Efficacy of Lorcaserin (Belvig) and Phentermine plus Extended-Topiramate (Qsymia) at 1 Year.* TO THE EDITOR: Colman et al. (Oct. 25 issue)1 to the terms in the table. Using Clinical Trials.gov Mean Percentage Change Proportion of Pa describe trial results underlying approval of two (www.clinicaltrials.gov), we identified six studies ≥5% of Bod Drug, Study, in Body Weight weight-management drugs by the Food and Drug of lorcaserin for obesity4 and nine studies of and Treatment (Mean Efficacy Criterion) (Categorical Effi Administration. However, their table included phentermine and topiramate for obesity5 (as of noninformative terms (e.g., "study 1") without October 15, 2012). Only Colman et al. could con-Belvig? citing publications or ClinicalTrials.gov records. firm the likely matches (Table 1). Studies 1 and 2 combined The materials that were referenced2,3 used only This is an important example of why listing 10 mg BID -5.8 acronyms (e.g., BLOOM) and internal identifiers ClinicalTrials.gov identifiers (NCT numbers) would (e.g., OB-301) — neither of which could be linked provide unambiguous access to trial-design infor-Placebo -2.523 Study 3 Table 1. Different Identifiers for the Same Clinical Studies.* 10 mg BID -4.538 Drug, Identifier Used by Colman et al., Probable and Identifier Used in References ClinicalTrials.gov Publication (PubMed Identifier) Associated Placebo 16 -1.5Identifier Cited by Colman et al. with Probable ClinicalTrials.gov Identifier Qsymia[®] Belvia Study 1 Studies 1 and 2 combined BLOOM NCT00395135 Smith et al. Multicenter, placebo-controlled trial of lor-15 mg/92 mg -10.967 caserin for weight management. N Engl J Med 2010; 363:245-56 (20647200) 17 Placebo -1.6Fidler et al. A one-year randomized trial of lorcaserin BLOSSOM NCT00603902 Study 2 for weight loss in obese and overweight adults: the BLOSSOM trial. J Clin Endocrinol Metab 2011; 7.5 mg/46 mg -7.862 96:3067-77 (21795446) 15 mg/92 mg -9.870 Study 3 NCT00603291 O'Neil et al. Randomized placebo-controlled clinical Placebo 21 -1.2trial of lorcaserin for weight loss in type 2 diabetes mellitus: the BLOOM-DM study. Obesity (Silver Spring) 2012;20:1426-36 (22421927) Osymia Study 1 NCT00554216 Study 2 NCT00553787 Gadde et al. Effects of low-dose, controlled-release. OB-303 phentermine plus topiramate combination on weight and associated comorbidities in overweight and obese adults (CONQUER): a randomized, placebocontrolled, phase 3 trial, Lancet 2011:377:1341-52 (21481449)* BLOOM denotes Behavioral Modification and Lorcaserin for Overweight and Obesity Management, BLOOM-DM Behavioral Modification and Lorcaserin for Obesity and Overweight Management in Diabetes Mellitus, BLOSSOM Behavioral Modification and Lorcaserin Second Study for Obesity Management, and NA not applicable.

Source: Zarin DA, Tse T. N *Engl J Med*. 2013; 368:580-1

N ENGL J MED 368;6 NEJM.ORG FEBRUARY 7, 2013