CT-College

CT-College : missions and organisation for the early phase clinical trials

CTR infosession for sponsors 15/03/2023

federal public service
HEALTH, FOOD CHAIN SAFETY AND ENVIRONMENT

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Outline

- Competent for the 3 EU regulations CTR/MDR/IVDR
- Implementation of these EU regulations in Belgium
- The College Board, its mission and achievements
- Organisation for the early phase clinical trials
- Tips & tricks
- Challenges & solutions

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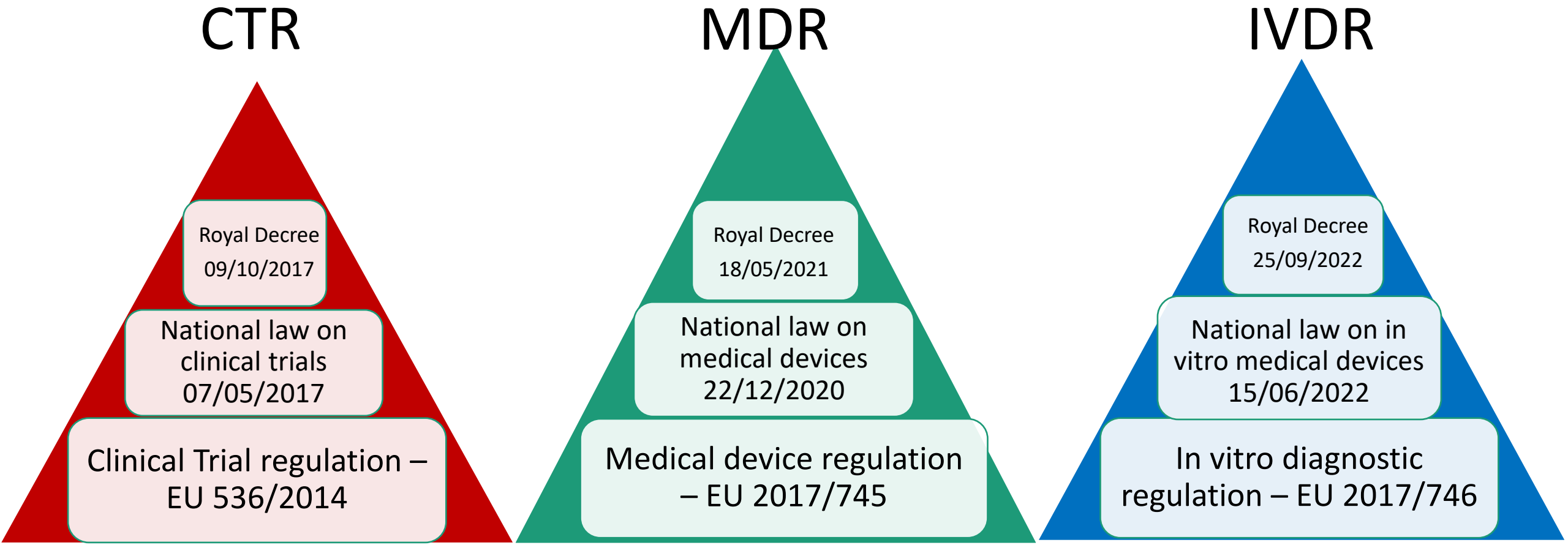
Belgian Legislation on European regulations



31/01/2022

26/05/2021

26/05/2022

Implementation of CTR, MDR & IVDR in Belgium highlights

- National contact point (NCP): **FAMHP** **(Law of 7 May 2017, Art. 4; CTR, Art 83)**

- The **FAMHP** and the **Evaluating Ethics Committee** are jointly in charge of the evaluation

- Reorganisation of the ethics assessment/ECs
  - Creation of a "**College**"
  - 1 EC involved per assessment

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Creation of the College (Board): Ministerial Decree

SERVICE PUBLIC FEDERAL SANTE PUBLIQUE, SECURITE DE LA CHAINE ALIMENTAIRE ET ENVIRONNEMENT

[C − 2021/41548]

18 MAI 2021. — Arrêté ministériel portant nomination des membres, du président et du vice-président du Collège visé dans la loi du 7 mai 2017 relative aux essais cliniques de médicaments à usage humain

Le Ministre de la Santé publique,

FEDERALE OVERHEIDSDIENST VOLKSGEZONDHEID, VEILIGHEID VAN DE VOEDSELKETEN EN LEEFMILIEU

[C − 2021/41548]

18 MEI 2021. — Ministerieel besluit houdende benoeming van de leden, van de voorzitter en ondervoorzitter van het College zoals bedoeld in de wet van 7 mei 2017 betreffende klinische proeven met geneesmiddelen voor menselijk gebruik

De Minister van Volksgezondheid,

- Independent College created within the Federal Public Service of Health, Food Chain Safety and Environment.
- The decree defines the mission, organisation, composition of the College and its collaboration with FAMHP and evaluating ECs.
- 4 Physicians with experience in Phase I, 4 lawyers, 2 experts in quality control system
- Not Full Time Equivalent – supported by an administrative staff by the FPS of Health

Mission of the College

1° Single point of contact between FAMHP and ECs
2° Assignment of EC in charge of evaluation of clinical study applications
- ✓Objective criteria defined by legislation
- ✓Cannot be the EC of the study site(s)

3° Ensure a consistent application of the law by the ECs.
Recommendations to the ECs can be made.
4° Formulate advices on the application of the regulations and legislation
5° Coordinate, harmonise, support, evaluate and follow-up the quality control activities carried out by the ECs.
Recommendations to the ECs can be made.
6° Support ECs in the evaluation of applications,
7° Submit annual activity report to Minister and Parliament

Law of 7 May 2017, Art. 9. §3

Organisation of the College

Rules of internal order: Royal Decree

SERVICE PUBLIC FEDERAL SANTE PUBLIQUE, SECURITE DE LA CHAINE ALIMENTAIRE ET ENVIRONNEMENT

[C − 2021/34185]

26 NOVEMBRE 2021. — Arrêté royal portant approbation du règlement d'ordre intérieur du collège tel que visé dans la loi du 7 mai 2017 relative aux essais cliniques de médicaments à usage humain

PHILIPPE, Roi des Belges,

FEDERALE OVERHEIDSDIENST VOLKSGEZONDHEID, VEILIGHEID VAN DE VOEDSELKETEN EN LEEFMILIEU

[C − 2021/34185]

26 NOVEMBER 2021. — Koninklijk besluit houdende goedkeuring van het huishoudelijk reglement van het College zoals bedoeld in de wet van 7 mei 2017 betreffende klinische proeven met geneesmiddelen voor menselijk gebruik

FILIP, Koning der Belgen,

Mission of the College

Tasks delegated to admin staff FPS Health

1° **Single point of contact between FAMHP and ECs**

2° **Assignment of EC in charge of evaluation of clinical study applications**

- ✓ Objective criteria defined by legislation
- ✓ Cannot be the EC of the study site(s)

3° **Ensure a consistent application of the law by the ECs.**
Not delegated: *Recommendations to the ECs can be made*

4° Not delegated: Formulate advices on the application of the regulations and legislation

5° **Coordinate, harmonise, support, evaluate and follow-up of the quality control activities carried out by the ECs**.
Not delegated: *Recommendations to the ECs can be made*

6° **Support ECs in the evaluation of applications**,

7° Prepare annual activity report for the Minister and Parliament.

Law of 7 May 2017, Art. 9. §3

Organisation of the College

Admin staff FPS Health

Admin staff organizes :

- Infosessions for ECs: 3 / year -> 4 / year in 2024 !
- Working group meetings with ECs and FAMHP: 1 / month
- CT College Forum for ECs: 1 / 2 weeks (Q&A sessions on CTR/MDR/IVDR/CTR Pilot and CTIS)
- College Board meetings : 10 / year

Organisation of the College

College Board meetings and achievements

- **Meetings**: monthly
  in case of urgencies ad hoc meeting or via written consultation
- Admin staff reports on **delegated tasks**
- Discuss **questions** from ECs, sponsors or admin staff
- Prepare **advices** : e.g.
  - advice to ECs on safety assessment,
  - advice to Minister on ombudsfunction,
- Discuss, adapt and/or endorse **templates and procedures** : e.g.
  - site suitability statement template,
  - CV Investigator
  - procedure for assignment of the EC,
  - endorsement e-ICF guidance,
  - Tool for Quality Control by ECs

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College Board – assignment of EC

Legal Criteria

1) The EC must be currently **recognized** under the law of 07/05/2017
2) The EC doesn't have any quality issue
3) In case of Phase 1 CTA : the EC is **recognized for phase I** trials
4) In case of **appeal** : the EC that already assessed the dossier is excluded
5) The EC is **independent of all the sites** involved in the study and of the **sponsor**
6) The EC **expertise** domain(s) matche(s) the therapeutic domain(s) of the study
7) Is there any **connection between the study application with a former one**: e.g. in case of a
   - Resubmission
   - SM or a subsequent addition of a MSC
   - Extension study
   - Initial (part II) or a subsequent addition of Belgium (part II) for "staggered submissions"

College Board – assignment of EC

Additional Criteria

- **Language** of ICFs
- Sister studies: CTAs submitted **simultaneously** which are very similar trial, i.e. same IMP and very **similar protocol and ICFs**.
- **Combo** studies: e.g. IMP combined with Medical Device or In vitro Diagnostic Medical Device

College Board – assignment of EC - early phase CT

- List of recognized ECs under the law 2017 : www.ct-college.be
- Number of ECs recognized : 15 (**9 of these 15 are recognized Phase I**)
- Validity of the recognition : 2 years (renewal : max. 4 years)
- Composition of the ECs in compliance with Law 2017 (+ RD 9/10/17 and RD 9/11/19)
- In order to be recognized Phase I, Composition of EC as other than Phase I CTs **AND :**
  - Member with expertise in clinical pharmacology ;
  - Member with expertise in the evaluation/conduct of Phase I trials ;
  - Representative of healthy volunteers

College Board – assignment of EC - early phase CT

Recognition of Ethics committees delivered by the FAMHP - Application form Royal Decree 29/05/18 :

- Declaration legal entity / Contact point
- **Application also for assessment of Phase I CTs ?**
- Composition of the EC (list of members + CV +DOI)
- Description of the Quality system
- Description of the registration and management system of DOI of the members
- Declaration of Financial, logistical and administrative support
- Declaration of ability to evaluate the CTs
- Insurance certificate

Arrêté ministériel du 29 mai 2018 ministériel fixant le modèle du formulaire de demande d'agrément ou de prolongation d'agrément comme Comité d'éthique au sens de la loi du 7 mai 2017 relative aux essais cliniques de médicaments à usage humain - formulaire de demande

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- Challenges & solutions

Tips & Tricks - General

- Track changes versions of modified documents should be provided with the answers to the Part I and Part II assessment RFIs and with the applications for substantial modifications (see Contents of CTR dossiers under https://www.famhp.be/en/eu_regulation_5362014)
- Naming of the documents (see Contents of CTR dossiers under https://www.famhp.be/en/eu_regulation_5362014)
- Synopsis German is not Dutch !
- No google translation of the patient documents !

Tips & Tricks – New Site suitability template (1/3)

- New version dated 6 June 2023 published on the FAMHP website https://www.famhp.be/en/eu_regulation_5362014
- Complete with the Unique identification number of the sites
- Only to be signed by the CEO of the hospital.
- Till the end of September 2023, the old Belgian template, which had to be signed both by Principal Investigator and CEO, still can be used for submissions. **From October 2023 onwards, the new template should be used.**

Tips & Tricks – New Site suitability template (2/3)

Site Suitability Template

- For Belgium, this form is a mandatory document to be submitted with Part II of the dossier.
- To minimise the number of Request For Information (RFIs) that could be raised during the process and possible rejection, kindly provide detailed and informative responses to each and every question at the best of your knowledge.
- When completing this form, any national guidelines should also be referred to with regards to which sections must be completed. Where no national guidelines exist, the form should be completed in full.
- Where information which is requested in this form is provided elsewhere in the application dossier, the document can just be referenced rather than repeating the information.
- A separate document should be completed and submitted for each site.

This template has been endorsed by the EU Clinical Trials Coordination and Advisory Group to comply with Regulation (EU) No. 536/2014 Clinical Trials on Medicinal Products for Human Use.

Section 1	
EU trial number	
Title of clinical trial	
Name of site[1], city	
If applicable, unique identification number of the site[2]	

Tips & Tricks – New Site suitability template (3/3)

Name of site, city and, if applicable, unique identification number of the site:

1) When it concerns a healthcare institution, use the name, city and recognition number of the hospital site(s) as given in the list of the FPS Public Health (belgium.be) and which are registered in CTIS. If the CEO of different hospital sites is the same, the sites can be listed in one statement.
2) With the recognition number is meant the "Erkenningsnummer van het ziekenhuis" / "Numéro d'agrément de l'hôpital".
3) If it does not concern a healthcare institution, mention the name of the Private organisation.

Examples:

Name of site[1], city	Onze Lieve Vrouwziekenhuis, campus Asse (1730 Asse), campus Aalst (9300 Aalst), campus Ninove (9400 Ninove)
If applicable, unique identification number of the site[2]	126

Tips & Tricks – College Board – ICF template – private practice

▪ ***Who·can·I·contact·in·case·of·questions?***¶

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Name¤	Function¤	In·case·of¤	Contact·details¤	¤
Surname,·First·name¶ ¤	Principal·Investigator·of·the·site¤	Information,·problems·or·concerns¤	Phone·N°,·E-mail¤	¤
¤	The·trial·staff·¤	Information,·problems,·concerns¤	Phone·N°¤	¤
¤	Emergency·contact·[not·emergency·department·of·hospital]¤	Emergency¤	Phone·N°¤	¤
¤	Patient·rights·ombudsman¤	Concerns·relating·to·your·rights·as·a·participant·in·a·trial¤	Phone·N°¤	¤
Name·and·address·of·insurance·company·of·the·sponsor·&·contact·of·insurer¤	Insurance·Company·of·the·sponsor¤	In·case·of·disagreement·or·complaint·on·a·damage·claim¤	Policy·N°¤	¤
¤	Data·protection·officer·of·the·**site**¤	Questions·relating·to·the·confidentiality·of·your·data¤	Phone·N°¶ E-mail:·e-mail·¤	¤
¤	Belgian·Data·Protection·Authority¤	Complaints·relating·to·the·confidentiality·of·your·data¤	E-mail°:· contact@apd-gba.be·¤	¤

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Tips & Tricks – College Board – ICF template – private practice

- When **no Data Protection Officer (DPO) is available at the trial site**, for example for trials in private practices. **Only in that specific case** :

Who can I contact in case of questions?

- The "**Data protection officer of the site**" can be replaced by the "**Principal Investigator**" that will take on the role of DPO.

Tips & Tricks – College Board – ICF template – private practice

- When no **patient rights ombudsman is available at the trial site**, for example for trials in private practices.

Who can I contact in case of questions?

- **Board's proposal:**
  - No independent entity currently has the (legal) competence to fulfil this role
  - This role could be taken by "The Federal Ombudsman Service for Patients' Rights"
  - Lack in legislation
  - The Minister is informed of this proposal (letter to Minister dd 29/04/2022)

Tips & Tricks – College Board – ICF template – private practice

Temporarily:

- When no **patient rights ombudsman is available at the trial site**, for example for trials in private practices. **Only in that specific case** :

Who can I contact in case of questions?

- The "**patient rights ombudsman**" can be replaced by the FAMHP or the CT-College depending on the type of trial:

Applications approved via a pathway or procedure where the **CT-College is involved**: The "patient rights ombudsman" can be replaced by "Clinical Trial College"	e-mail: ct.college@health.fgov.be
Applications approved via a pathway or procedure where the **CT-College is not involved**: The "patient rights ombudsman" can be replaced by "Federal Agency for medicines and health products (FAMHP)"	e-mail: inspection @fagg-afmps.be

Tips & Tricks – language of patient documents

- CTR Q&A 1.24: ***In which language*** to submit documents that are given to a patient?

Part I, patient facing documents	Part II, Recruitment material and subject information sheets
To be submitted at least in the official national language(s) of the region(s) where the trial is conducted. EN is optional (cfr CTR Q&A Annex II)	***To be submitted at least in the official national language(s) of the region(s) where the trial is conducted. (List of documents FAMHP website)***

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Challenges and solutions

Challenges	Solutions
• A/ Harmonisation opinion of Ecs	• A/ Information sessions / CT College Forum / College Board advice / Analysis of the questions/decision by BAREC / BAREC Harmonisation WG
• B/ CTIS Bugs	• B/ EMA tickets / CTCG Assessors roundtable
• C/ Timelines	• C/ Monitoring / KPIs
• D/ Quality system by the Ecs	• D/ Quality tool College Board
• E/ Human ressources	• E/ Followed by the College Board

Thank your for your attention !