## Who is responsible for registering the trial on ClinicalTrials.gov?

The individual/entity responsible for registering the trial is the "Responsible Party". The statute defines the responsible party as:

- The sponsor of the clinical trial, (as defined in <u>21 C.F.R. 50.3</u>)
  -OR-
- The *principal investigator (PI)*, if the PI:
  - o Is so designated by a sponsor, grantee, contractor, or awardee,
  - o Is responsible for conducting the trial,
  - Has access to and control over the data,
  - o Has the right to publish the results of the trial, and
  - o Has the ability to meet all of the requirements for the submission of clinical trial information.

<u>Click here for NIH Flowchart Identifying the "Responsible Party" for Applicable Clinical Trials.</u> Click here for Elaborations of Definitions of Responsible Party.

The guidance below provides a few categories of trials under which the **sponsor/funding agency** should be the "responsible party" to register the trial on Clinicaltrials.gov:

- Industry sponsors should take responsibility to register the trial if:
  - o The study/protocol is *industry-initiated* (industry-written protocol), or
  - The industry sponsor is the applicant/holder of an Investigational New Drug (IND) or Investigational Device Exemption (IDE).
- For *multi-site* and *subaward* trials, the lead sponsor/site should take responsibility to register the trial. *If* the USC PI is not the lead sponsor/site, he/she should consult with the lead sponsor/PI to ensure registration is competed and to avoid duplicate registrations.

The guidance below provides a few categories of trials under which the **PI** is the "responsible party" to register the trial on Clinicaltrials.gov:

- The PI is considered the responsible party for registering the trial for:
  - o *Investigator-initiated* trials, regardless of the funding source, including unfunded studies (e.g., gifts, departmental funds, etc.), and those funded by non-profit organizations.
  - o Studies involving an application where the PI is the holder of an IND or IDE.