EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

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EU PAS Register Guide

The EU PAS Register is temporarily hosted on the ENCePP website www.encepp.eu

Official address Domenico Scarlattilaan 6 ● 1083 HS Amsterdam ● The Netherlands
Address for visits and deliveries Refer to www.ema.europa.eu/how-to-find-us
Send us a question Go to www.ema.europa.eu/contact **Telephone** +31 (0)88 781 6000 An agency of the European Union

1. The European Union electronic Register of Post-Authorisation Studies (EU PAS Register)

The EU PAS Register is a publicly available register of **non-interventional post-authorisation studies (PAS)**.

The Register has a focus on observational research, and its purpose is to:

- increase transparency,
- reduce publication bias,
- promote the exchange of information and facilitate collaboration among stakeholders, including academia, sponsors and regulatory bodies,
- ensure compliance with EU pharmacovigilance legislation requirements.

EU pharmacovigilance legislation requires the European Medicines Agency (EMA) to make public the protocols and abstracts of results of **non-interventional post-authorisation safety studies (PASS) imposed as an obligation of marketing authorisation** by a competent authority in accordance with Articles 10 or 10a of Regulation (EC) No 726/2004 or with Articles 21a or 22a of Directive 2001/83/EC. Annex III of the Commission Implementing Regulation (EU) No 520/2012 further specifies that the final report of imposed non-interventional PASS must provide the date of making it public (in EU PAS Register).

PASS initiated, managed or financed **voluntarily** by a marketing authorisation holder and which are required in a **Risk Management Plan (RMP)** to further investigate safety concerns or to evaluate the **effectiveness of risk minimisation activities**, and any other PASS should also be entered in the EU PAS Register to support the same level of transparency, scientific and quality standards. Further information about the requirements for the registration of PASS is available in the guideline on Good Pharmacovigilance Practices (GVP) module VIII.

To support transparency on **post-authorisation efficacy studies (PAES)** initiated, managed or financed by a marketing authorisation holder voluntarily or pursuant to an obligation, and which are **outside the scope of Directive 2001/20/EC,** study information (including for PAES conducted outside the EU) should also be entered in the EU PAS Register. Further information about the requirements for PAES is available on the Q&A webpage.

2. EU PAS Register: How does it work?

2.1. How to register a study – Step by Step Guide

MAHs and investigators who wish to register their studies in the 'EU PAS Register' referred to in the GVP need to submit on-line via the ENCePP website (as detailed step-by-step below) a completed questionnaire and any other relevant documents to be made publicly available either voluntarily or in line with the requirements of Articles 107 m-q of Directive 2001/83/EC.

The MAH and investigator will receive an automatic acknowledgment email once a study has been registered, with the date of the study registration, the study registration number and login details to regularly update the details of their studies in the register, including as milestones are reached.

Before You Start – Important User Information

Navigation: DO NOT use the 'Enter'-key to move in the application. Always use the **'Tab'-key** or your mouse to move from one data field to the next.

Timeout: The application will timeout after 20 minutes of idle time.

To avoid a complete loss of data due to timeout:

- Download pdf version of data entry form

- Check for compulsory data fields, and prepare information

- Complete data entry without leaving your computer idle for longer than 20 minutes

OR

- Following completion of compulsory data fields on the first page of the data entry form, use 'Save & Exit' to return to the questionnaire at a later stage.

'Save & Exit': Use this function often to ensure that no data is lost. An email confirming the study reference number and including instructions on how to resume data entry will automatically be sent to the PLI's email address. To return to the latest saved version of the questionnaire please use the 'Resume draft'-function of the database.

Display format: the format of the data pages changes depending on the stage of data entry. During '*Add a study*'-mode the four pages of the data entry form are displayed – and need to be completed – consecutively. The same applies for partially or fully completed questionnaires in '*resume draft*'-mode. Once all sections have been completed and by clicking on '*Review and Submit*' the display of the pages changes to Tabs which are identical to the public registry. The information may be edited by section prior to submitting the whole entry to the EU PAS Register. The Tabs view is also present in '*Edit*'-mode when reviewing data that has already been submitted.

Document upload: Only **pdf documents** of 10Mb or less each can be uploaded to the database; only pdfs are supported.

Internet Explorer - Troubleshooting

Some Internet Explorer users may receive an error message when attempting to retrieve a study record for editing. The problem is due to an Internet Explorer caching issue.

To resolve the issue, it is recommended to either use a different browser, or alternatively, to clean the Internet Explorer cache:

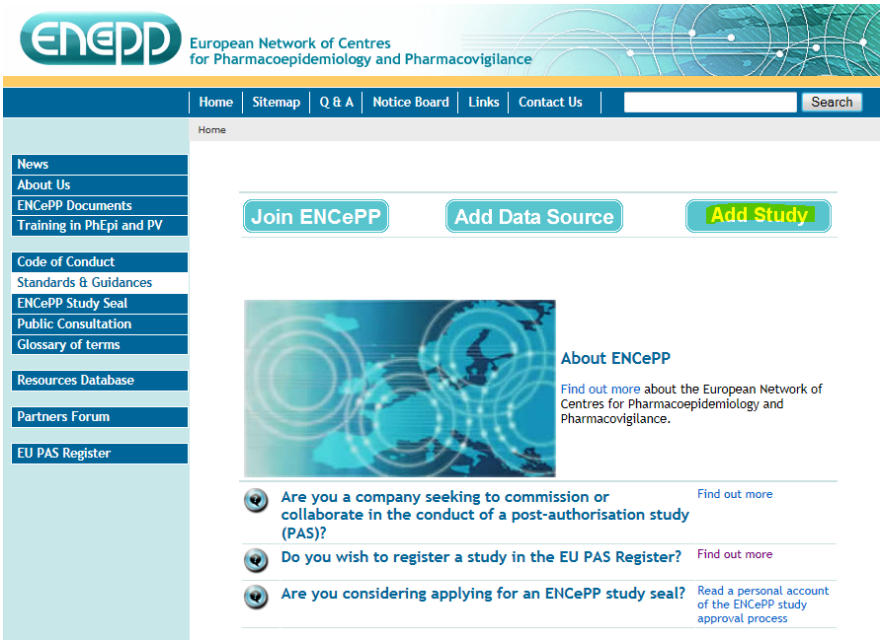
1. Open a new Internet Explorer browser session

2. Tools -> Internet options -> General -> Delete... -> Delete -> OK

2.1.1. How to add a study

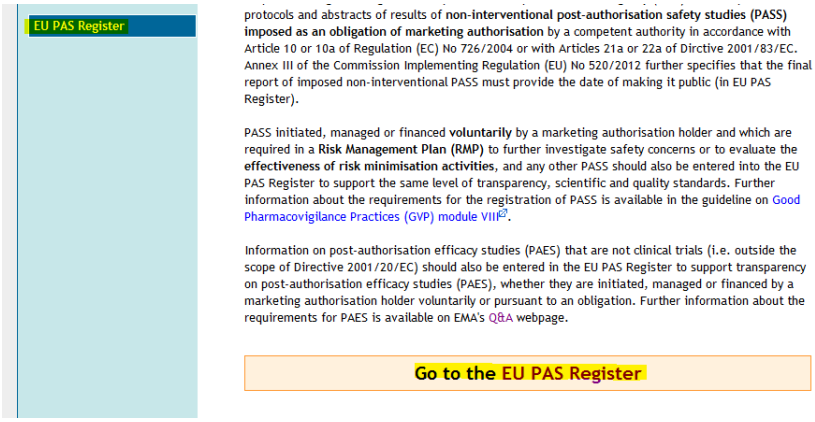
Go to ENCePP Website (www.encepp.eu)

Click on "Add Study":



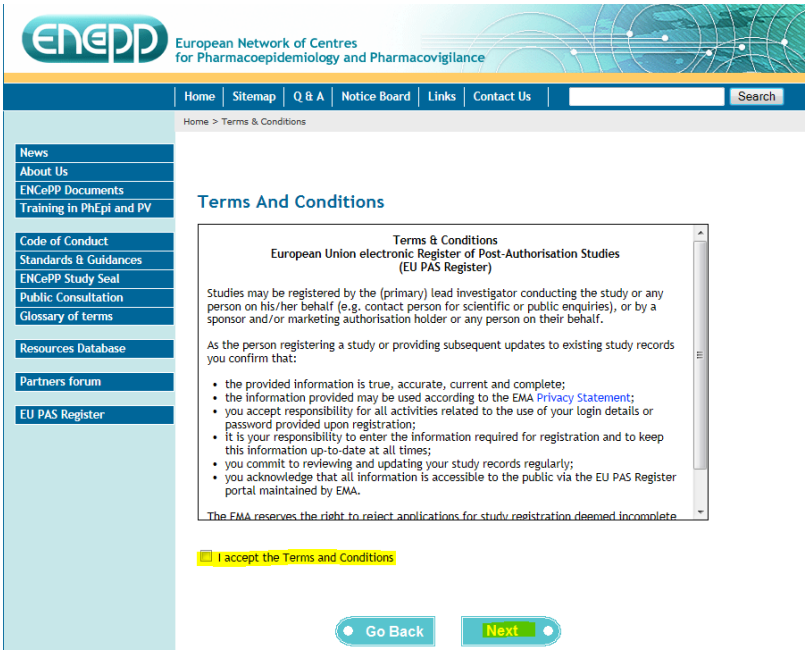
or

Click on “EU PAS Register” and then click on “Go to EU PAS Register:

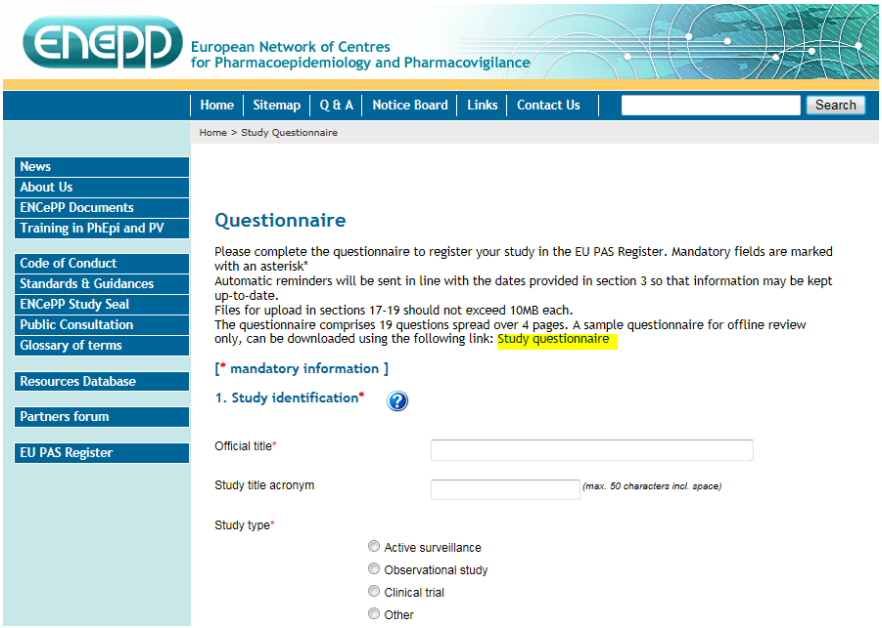


Click on “Add Study”:

Accept “Terms and Conditions” if in agreement and click on “Next”:



Complete the questionnaire (total of 19 questions). NOTE: a sample questionnaire in pdf format may be viewed/downloaded by clicking on the words “study questionnaire”, as highlighted below:



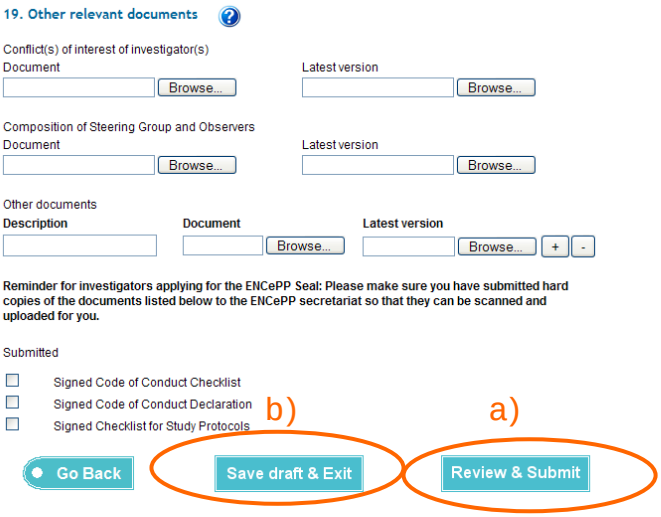
On completion of the questionnaire:

a) If you are **ready to submit the data**, click on “Review and Submit” ➔ this will allow you to review the data entered so far, edit if necessary, and from the last tab you can choose to “Submit” the data for review and approval.

Once the entry has been approved, you will receive an email with a password for future updates. Of note, this password is not record-specific, but will provide access to all studies registered with the email address provided under the contact details for the (primary) lead investigator.

NOTE: On clicking “Review and Submit” the display of the pages changes to Tabs which are identical to the public registry. The information may be edited by section prior to submitting the whole entry.

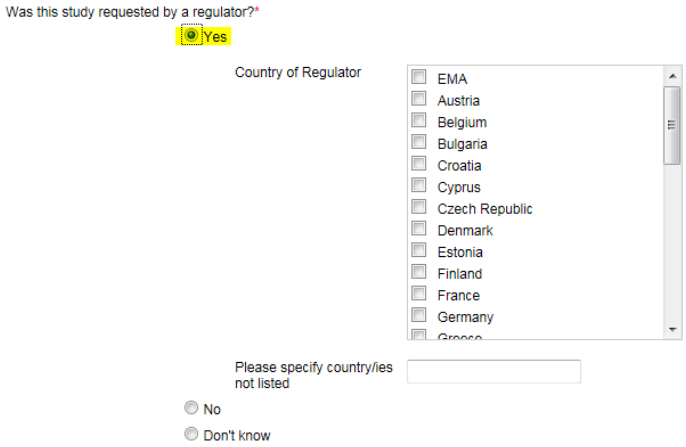
b) If you **do not wish to submit the data yet**, and would like to resume the completion of the form later, click on "Save draft & Exit" ➔ your **login details** for editing your entry at a later date will be displayed on screen; you will also receive an automated email confirming the study reference number and including instructions on how to resume data entry.



2.1.2. Important information for marketing authorisation holders

Questionnaire question 1 – Study identification

If the study is a **PASS imposed as an obligation** by a competent authority in accordance with Articles 10 or 10a of Regulation (EC) No 726/2004 or with Articles 21a or 22a of Directive 2001/83/EC, or a PASS which is initiated, managed or financed voluntarily by a marketing authorisation holder and **required in the Risk Management Plan (RMP)** to further investigate safety concerns or any **other study requested by a regulatory authority** for any other reason, the question "Was this study requested by a regulator" should be answered with "Yes":



The question "Is the study required by a **Risk Management Plan** (RMP)?" may be answered by choosing one of the five options in the drop-down list:

EU RMP category 1 (imposed as condition of marketing authorisation)

A post-authorisation safety study (PASS) may be imposed as condition of the marketing authorisation because it is key to the benefit-risk profile of the product. In the EU Risk Management Plan (EU RMP) these studies are referred to as category 1 studies in the pharmacovigilance plan of an authorised

medicinal product. If the condition is a non-interventional PASS, it will be subject to the supervision set out in Art 107 (m)-(q) of Directive 2001/83/EC and the format and content of such non-interventional PASS as described in Implementing Regulation 526/2012 Annex III (see GVP Module VIII).

EU RMP category 2 (specific obligation of marketing authorisation)

A PASS may be a specific obligation in the context of a conditional marketing authorisation (MA) or a MA under exceptional circumstances. In the EU RMP these studies are referred to as category 2 studies in the pharmacovigilance plan of an authorised medicinal product. If the specific obligation is a non-interventional PASS, it will be subject to the supervision set out in Article 107 (m)-(q) of Directive 2001/83/EC and the format and content of such non-interventional PASS as described in Implementing Regulation 526/2012 Annex III (see GVP Module VIII).

EU RMP category 3 (required)

PASS which do not fall in category 1 or 2 but are required to investigate a safety concern as part of the pharmacovigilance plan of an authorised medicinal product are legally enforceable. In the EU RMP these studies are referred to as category 3 studies (see GVP Module VIII).

Non-EU RMP only

PASS which are included in risk management systems outside the jurisdiction of EU medicines regulation (e.g. Risk Evaluation and Mitigation Strategies (REMS) under US regulation).

Not applicable

Any post-authorisation study (PAS) which is not subject to regulatory supervision and not a RMP pharmacovigilance activity.

Questionnaire question 2 – Research centres and investigator details

The (primary) lead investigator is the main contact for a registered study. In situations where no (primary) lead investigator has been nominated by the sponsor the contact details of the person in charge of the conduct of the study should be entered in the respective fields. The staff member of a pharmaceutical company or institution who is entering the study details into the EU PAS Register should provide his/her contact details under the contact for scientific or public enquiries.

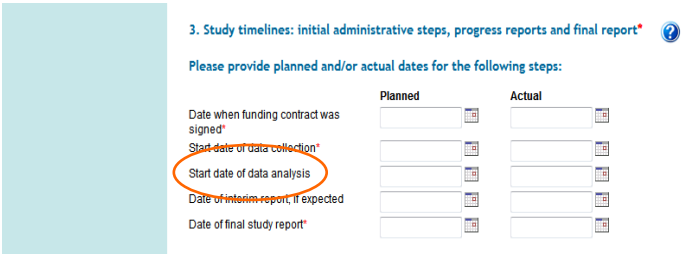
Questionnaire question 3 – Study timelines: initial administrative steps, progress reports and final study report

A study may have the status “planned”, “ongoing” or “finalised”. The EU PAS Register foresees **five different study timelines**, three of which are mandatory:

- Date when funding contract was signed: when the planned or the actual date is entered, the status of the study will be “planned”;
- Start date of data collection: when the actual date is entered, the status of the study will change from “planned” to “ongoing”;
- Date of final study report: when the actual date is entered, the status of the study will change from “ongoing” to “finalised”.

Unless the relevant “actual dates” have been entered, automatic reminders are sent to the Primary/Lead Investigator’s contact email address 30 days after the planned date for the start of data collection, and 30 days after the planned date of the final study report.

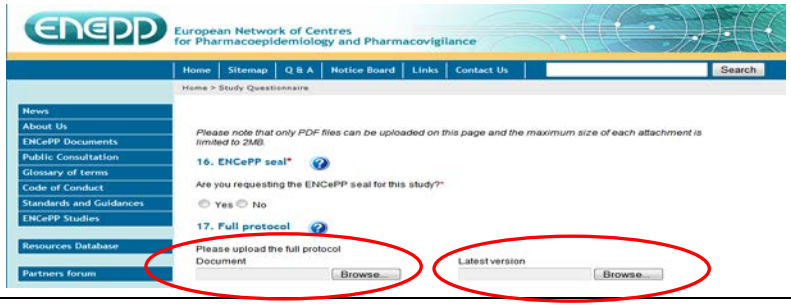
In line with the definition of the “end of data collection” provided in the guideline on Good Pharmacovigilance Practices (GVP) module VIII, chapter VIII.B.2, the date from which the analytical dataset is completely available also means “start date of data analysis”. The **date for the end of data collection**, which is required in the context of the submission of the final study report, should therefore be entered in the field “start date of data analysis”:



Questionnaire question 17 – Full protocol

The study protocol should be provided before the start of data collection. Where prior publication of the protocol could threaten the validity of the study or the protection of intellectual rights, a study protocol with redactions may be entered into the register prior to the start of data collection. Further information about the requirements for the registration of PASS is available in the guideline on Good Pharmacovigilance Practices (GVP) module VIII, chapter VIII.B.4.

There is no limit to the number of versions of the study protocol that can be uploaded in the system. No changes can be made to the "initial" document throughout the history of the study record once it has been uploaded and submitted. In “edit mode” (Edit a Study) if a "latest" version has been uploaded, this can be overwritten as often as necessary with a newer version, but only the very latest version will be visible.

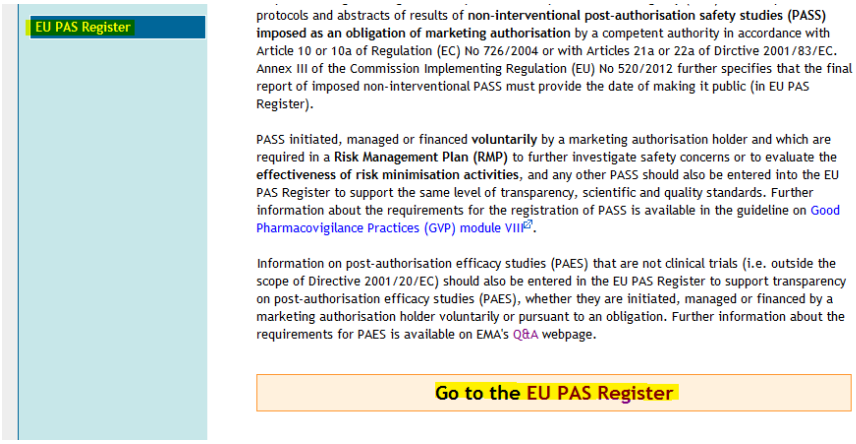


2.1.3. How to edit an existing entry

Once made public, existing entries may be edited any time (e.g. updates as milestones are reached, changes to the protocol that may affect the interpretation of the study, upload of documents, etc.).

Go to ENCePP Website (www.encepp.eu) ➔ EU PAS Register:

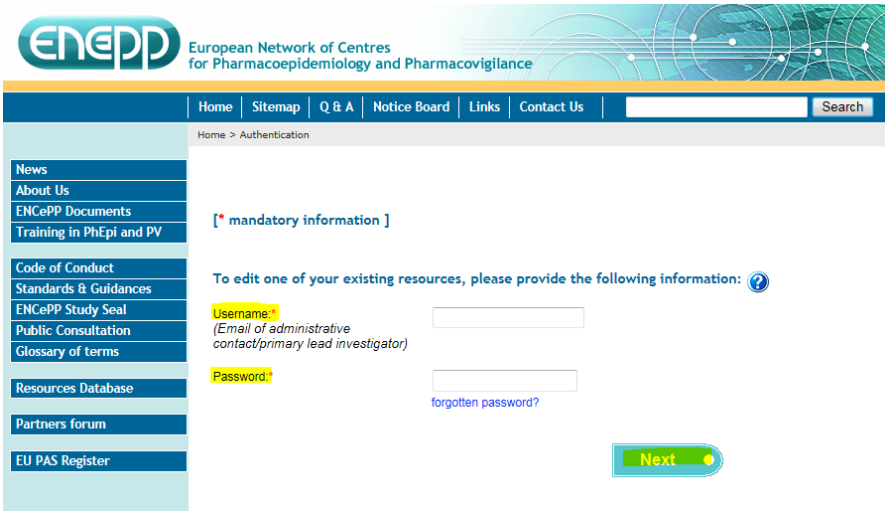
Click on “Go to EU PAS Register”:



Click on “Edit Study”:

When prompted, enter your username (email of primary lead investigator) and password;

Click on “Next”:



NB: If you have forgotten your password, click on “forgotten password” to retrieve it. You will be prompted to enter the email address of the PLI and the password will be sent to this address.

Your data will be retrieved and may be edited. Once you have completed your update(s), re-submit the data.

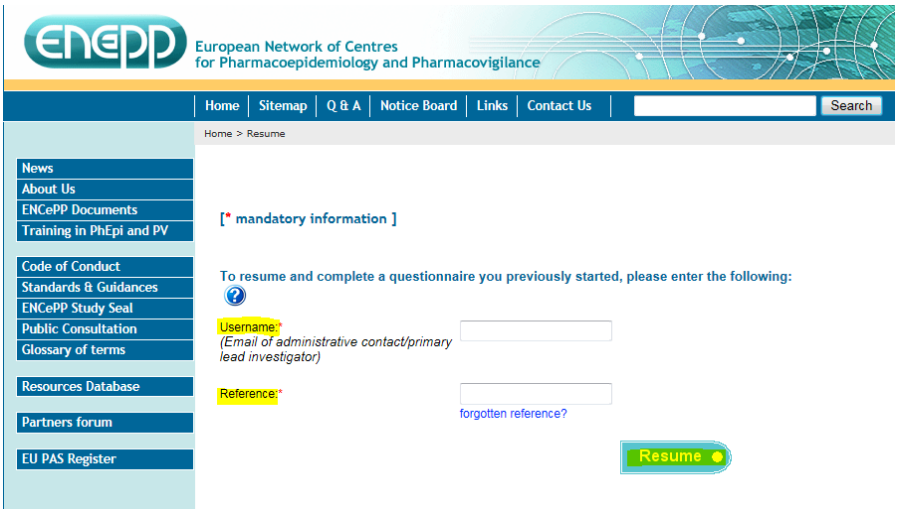
2.1.4. How to retrieve a draft application / rejected application

Draft application that have been started earlier (but have not been submitted yet) or applications that have been rejected for the purpose of requesting additional information, can be retrieved by following these steps:

Click on “Resume Draft/Rejected application”:

When prompted, enter your username (e-mail of PLI) and reference and click on “Resume”:

NB: The login details for resuming a draft entry are provided in the acknowledgement email that is sent to the address of the PLI on registration of a study, as soon as the button 'Save draft & exit' has been clicked.



2.2. Searching the EU PAS Register

Choose from available search criteria:

- EU PAS Register Number
- Status of Study
- Title of Study
- Acronym
- Study type
- Study requested by a regulator
- Risk Management Plan
- Other registration numbers

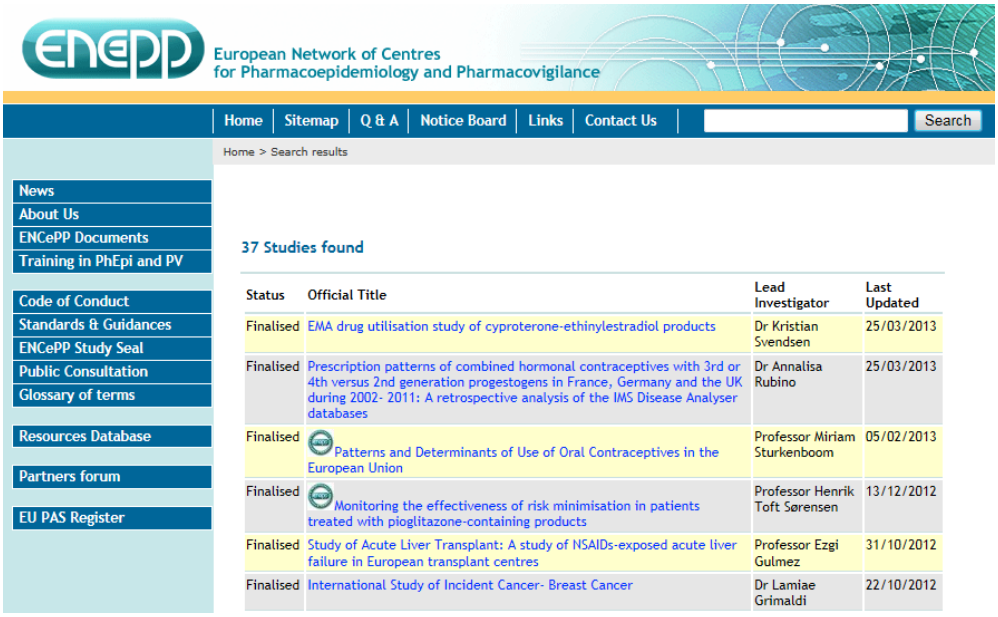
- Coordinating Study entity
- Research Network
- Study drug
- Medical condition
- ENCePP Seal
- Population age
- Other population
- Scope of the Study

(NB: If no search criteria are chosen, the search will return all entries)

Click on “Search”.

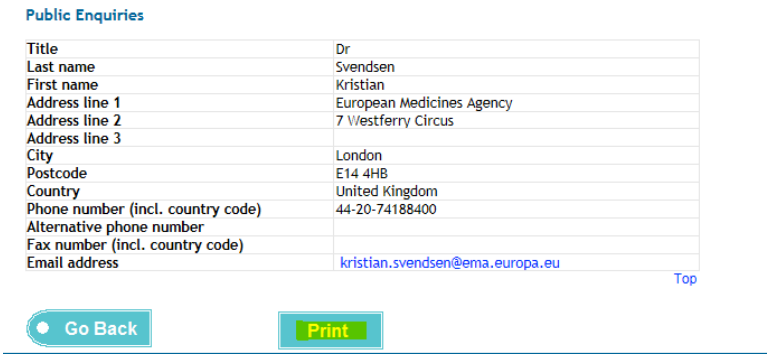
The search result will be displayed; ENCePP seal studies will display the ENCePP seal.

To view individual entries, click on the study title:



2.3. Printing an individual study record

Once an individual study has been selected, it is possible to print or save a pdf-version of the record by clicking on “Print” at the bottom of the screen. This print option is available on all four pages of the study record:



This will open a pdf-version of the record which can be printed or saved on a local drive.

3. Information and contact

More information can be found at: http://www.encepp.eu/encepp_studies/indexRegister.shtml

Contact: EU_PAS_Register@ema.europa.eu