

Requirements for Standardized Study Data: *Update on Guidance*

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Disclaimer

The views and opinions presented here represent those of the speaker and should not be considered to represent advice or guidance on behalf of the Food and Drug Administration.

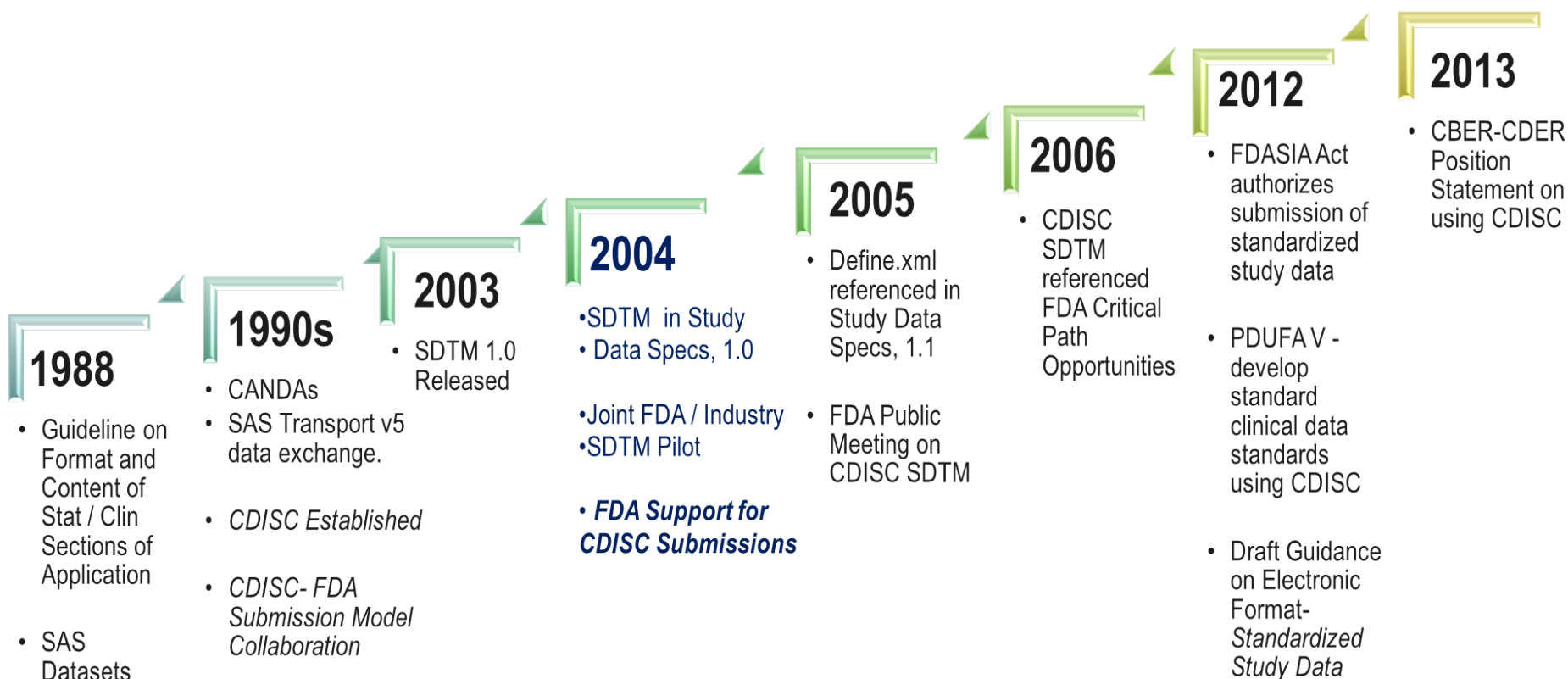
March, 2012



March, 2014



Road to Required Electronic Standardized Study Data



Data Standards Program Board 2010-2014

External Collaborations*



Automated Review Environment

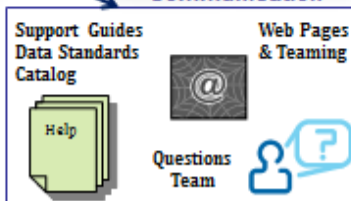


Cross-Center Membership

Strategy, Policy & Guidance



Communication



* examples

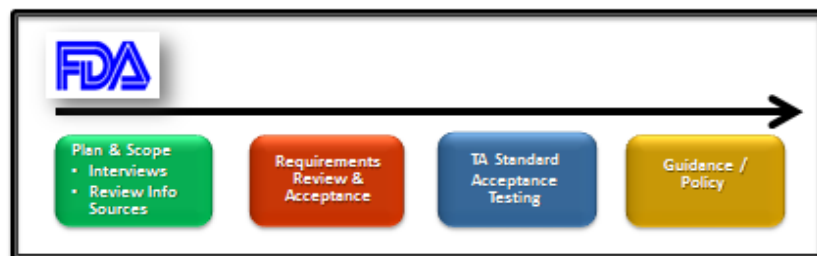
3

Collaborative TA Development Process: Implementation



6

FDA TA Requirements Process



- Requirements:
 - Primary,
 - Secondary,
 - Covariates,
 - Exploratory
- Requirements report review and acceptance
- Evaluate acceptability of TA standards for use in submissions
 - Ensure reviewers' readiness to use standardized data
- Update technical documents, as needed
 - Issue Federal Register Notice

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Data Standards - Action Plan Projects



9

FDASIA Statute*

Authorized Required Electronic Submissions

...no earlier than 24 months after final guidance issued after public notice” [certain] submissions shall be submitted in such electronic format as specified by the Secretary in such guidance.



... the [FDA] may—provide a timetable for establishment of further standards for electronic submission as required and set forth criteria for waivers of and exemptions from the requirements.

FDASIA* Re-Authorized PDUFA V

“...develop

standardized clinical

data terminology

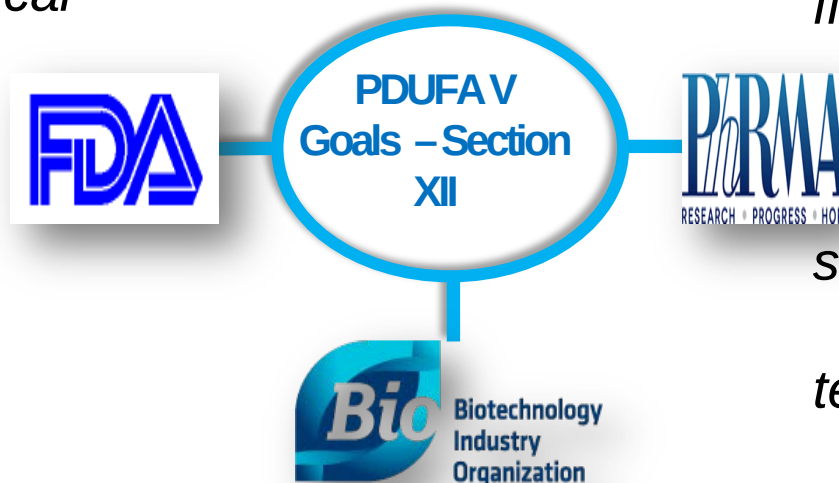
through open

standards

development

organizations (i.e.,

CDISC)”



“... periodically publish

final guidance specifying

the completed data

standards, formats, and

terminologies that

sponsors must use to

submit data in

applications.”

Re-Designed FDA Web Page

The screenshot shows the FDA website's 'For Industry' section. At the top, there's a navigation bar with links like 'Home', 'Food', 'Drugs', 'Medical Devices', 'Radiation-Emitting Products', 'Vaccines, Blood & Biologics', and 'Products'. A search bar and 'SEARCH' button are on the right. Below the navigation bar, the 'For Industry' section is highlighted. A yellow callout bubble points to the 'Study Data Standards Resources' link. The left sidebar contains a 'Data Standards' menu with 'Study Data Standards' selected. The main content area lists various resources, including a sign-up for email updates, a position statement, and a list of draft guidance documents.

U.S. Food and Drug Administration
Protecting and Promoting *Your* Health

A to Z Index | Follow FDA | FDA Voice Blog

SEARCH

Home | Food | Drugs | Medical Devices | Radiation-Emitting Products | Vaccines, Blood & Biologics | Products

For Industry

Home > For Industry > Data Standards > Study Data Standards

Data Standards

- Study Data Standards**
 - Study Data Standards for Regulatory Submissions Position Statement
 - Position on Use of SI Units for Lab Tests
 - Data Standards Research Areas and Collaborations
 - Janus Clinical Trials Repository (CTR) Project
 - Standard for Exchange of Non-Clinical Data

Study Data Standards Resources

- Sign up for email updates.
- [CBER/CDER Study Data Standards for Regulatory Submissions Position Statement](#)
- [CDER/CBER Position on Use of SI Units for Lab Tests](#)

- The Agency can process, review, and archive electronic submissions that provide study data using the standards, formats, and terminologies specified in the **Data Standards Catalog** ([Click here](#))
- For CDER and CBER: Draft Guidance for Industry - Providing Regulatory Submissions in Electronic Format — Standardized Study Data.** [Click here to access the full guidance document.](#) The guidance, when final, will describe how FDA plans to implement the requirements for the electronic submission of standardized study data.
- Draft Study Data Technical Conformance Guide.** [Click here to access the Guide.](#) The Guide, when final, will provide technical specifications, recommendations, and general considerations on how to submit standardized electronic study data.

The following resources remain available until the publication of the final Study Data Technical Conformance Guide:

Study Data Specifications ([Click here](#))

Quick access to
Catalog, Guidance
and Tech Guide

Draft Binding Guidances & Tech Guide

Guidance for Industry Providing Regulatory Submissions in Electronic Format — Submissions Under Section 745A(a) of the Federal Food, Drug, and Cosmetic Act

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to <http://www.regulations.gov>. Submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document contact (CDER) Division of Drug Information at 301-796-3400 or (CBER) Office of Communication, Outreach, and Development at 800-835-4709 or 301-827-1800.

U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

February 2014
Electronic Submissions

Guidance for Industry Providing Regulatory Submissions in Electronic Format — Standardized Study Data

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Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

February 2014
Electronic Submissions
Revision 1

STUDY DATA TECHNICAL CONFORMANCE GUIDE

Technical Specifications Document

This Document is incorporated by reference into the following
Guidance Document(s):

**Guidance for Industry Providing Regulatory Submissions in Electronic
Format – Standardized Study Data**

For questions regarding this technical specifications document, contact CDER at cdcr-edatm@fda.hhs.gov or CBER at cbcr-cdsc@fda.hhs.gov

U.S. Department of Health and Human Services
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February 2014

Published for Public Comment: 6 February 2014

<http://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm>

What is Binding Guidance?

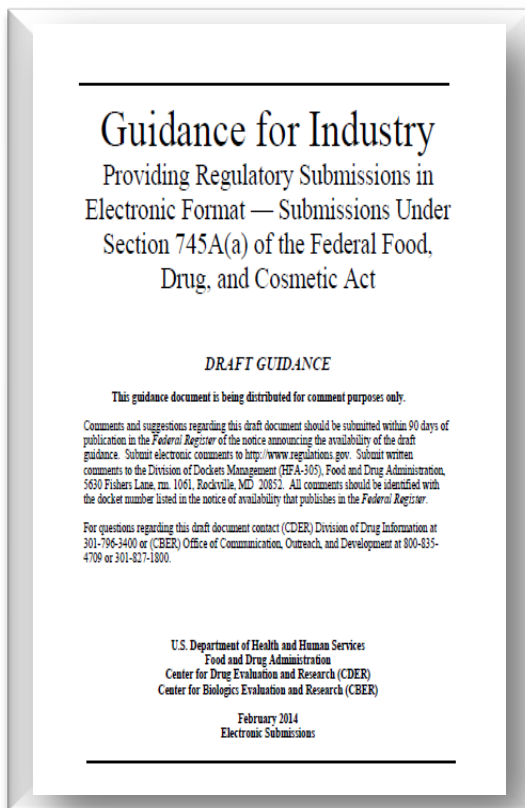
Guidance =



***Binding
Guidance
has a bite!***



FDASIA 745A(a) Guidance (1)



- **Submission types:**
 - NDAs, ANDAs, Certain BLAs & INDs
- Submission not in the electronic format(s) specified in guidance **will not be filed.**
- Electronic submissions are required no earlier than **24 months after a final guidance is issued.**
- **Individual** draft guidances will be developed.

eStudy Data Guidance (1)

Guidance for Industry

Providing Regulatory Submissions in Electronic Format — Standardized Study Data

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Electronic Submissions
Revision 1

- **Electronic submission of standardized study data required for:**
 - Certain INDs
 - NDAs
 - ANDAs
 - Certain BLAs
- **Including amendments, supplements, and reports**

eStudy Data Guidance (2)

- Study data must be submitted electronically or it will not be filed...*unless exempt*:
 - Devices regulated by CBER as biological products under Section 351 of the PHS Act
 - Study data in noncommercial INDs (e.g., investigator-sponsored INDs, emergency use INDs, and treatment INDs).

Guidance for Industry

Providing Regulatory Submissions in Electronic Format — Standardized Study Data

DRAFT GUIDANCE

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February 2014
Electronic Submissions
Revision 1

eStudy Data Guidance (3)

Guidance for Industry

Providing Regulatory Submissions in Electronic Format — Standardized Study Data

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February 2014
Electronic Submissions
Revision 1

- **What are the requirements for Standardized Study Data?**
 - Must be in a format that FDA can process, review, and archive.
 - Formats listed in the Data Standards Catalog (DSC).
 - DSC lists the supported and/or required standards.
 - DSC lists key dates for each standard.

eStudy Data Guidance (4)

Guidance for Industry

Providing Regulatory Submissions in Electronic Format — Standardized Study Data

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to <http://www.regulations.gov>. Submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document contact (CDER) Ron Fitzmartin at 301-796-5333, (CBER) Office of Communication, Outreach and Development (OCOD) at 301-327-1800 or 1-800-335-4709.

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Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)

February 2014
Electronic Submissions
Revision 1

- **What are the requirements for Standardized Study Data?**
 - DSC lists (or will) dates when:
 - Support begins and ends
 - Requirement begins and ends
- **FDA may Refuse To File**
 - If study data do not conform to the required standards, formats, and terminologies.

eStudy Data Guidance (5)

Data Standards Catalog

FDA Data Standards Catalog (v3.0 20140117)

This table contains a listing of the data standards supported by FDA. The submission of standardized data using any standard not listed, or to an FDA component not listed, should be discussed with the Agency in advance.

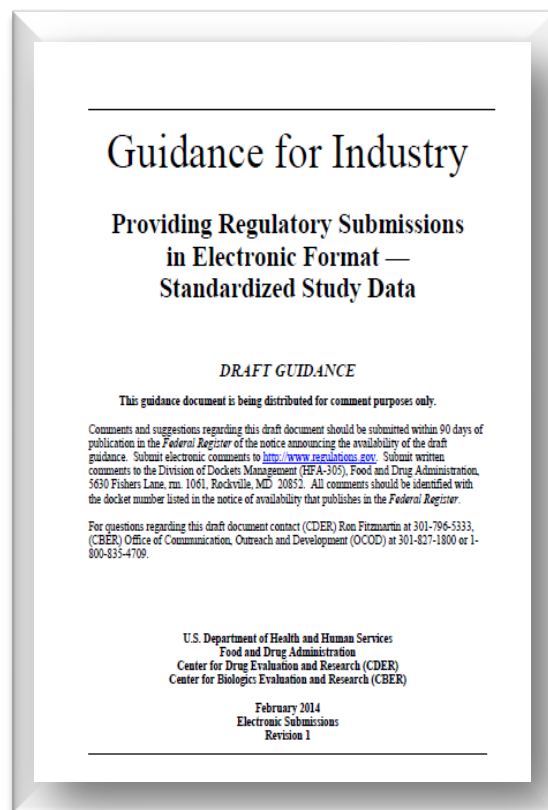
The standard terminology code sets are listed in a separate tab of this worksheet. Please look at the "Terminology" tab to find standard terminology information.

Use	Standard	Exchange Format	Standards Development Organization	Supported Version	Implementation Guide Reference	FDA Center	Date Support Begins (yyyy-mm-dd)	Date Support Ends (yyyy-mm-dd)	Date Requirement Begins	Date Requirement Ends	Regulatory References
Electronic Submissions											
Regulatory Electronic Submission	eCTD	XML	ICH	2	M2 eCTD: Electronic Common Technical Document Specifications	CDER, CBER	2008-06-01				Guidance for Industry: Providing Regulatory Submissions in Electronic Format -- Human and Veterinary Medications and
Documents	Portable Document Format	PDF	Adobe	1.4	N/A	CDER, CBER, CFSAN, CDRH, CVM	Ongoing				
Documents	Portable Document Format	PDF	Adobe	1.5	N/A	CDER, CBER, CFSAN, CDRH, CVM	Ongoing				
Documents	Portable Document Format	PDF	Adobe	1.6	N/A	CDER, CBER, CFSAN, CDRH, CVM	Ongoing				
Documents	Portable Document Format	PDF	Adobe	1.7	N/A	CDER, CBER, CDRH	2012-20-11				
Clinical and Non-Clinical study data sets - Transport	XPT	XPT	SAS	5	SAS Technical Support TS-140	CDER, CBER	Ongoing				eCTD 2.0
Clinical and Non-Clinical study data sets - Transport	XPT	XPT	SAS	5	SAS Technical Support TS-140	CDRH, CFSAN, CVM	Ongoing				For CDRH only: eCopy Program for Medical Device Submissions-Guidance for Industry and Food and Drug Administration Staff
SDTM, SEND, and ADaM define.xml file	XML		W3C	1.0		CBER, CDER, CDRH	Ongoing				http://www.w3.org/standards/xml/
Analysis program files	ASCII		ANSI			CBER, CDER, CDRH	Ongoing				http://www.ansi.org
Clinical & Non-Clinical Study Datasets											
Clinical study datasets	SDTM	XPT	CDISC	1.3	3.1.3	CBER, CDER	2012-12-01				http://www.cdisc.org/sdtm
Clinical study datasets	SDTM	XPT	CDISC	1.2	3.1.2 Amendment 1	CBER, CDER	2013-08-07				http://www.cdisc.org/sdtm
Clinical study datasets	SDTM	XPT	CDISC	1.2	3.1.2	CBER, CDER	2009-10-30				http://www.cdisc.org/sdtm
Clinical study datasets	SDTM	XPT	CDISC	1.1	3.1.1	CBER, CDER	Ongoing	2015-01-28			http://www.cdisc.org/sdtm
Clinical study datasets	ADaM	XPT	CDISC	2.1	1.0	CBER, CDER	Ongoing				http://www.cdisc.org/adam
Animal study datasets	SEND	XPT	CDISC	1.2	3.1.2	CDER	2011-06-13				http://www.cdisc.org/send
Clinical study data definition	Define	XML	CDISC	2.0	N/A	CBER, CDER, CDRH	2013-08-07				http://www.cdisc.org/define-xml
Clinical study data definition	Define	XML	CDISC	1.0	N/A	CBER, CDER, CDRH	Ongoing				http://www.cdisc.org/define-xml
Clinical Study Datasets - Therapeutic Areas											
This section is reserved for future therapeutic area data standards											

Dates:
Requirement Begins & Ends

eStudy Data Guidance (6)

- Will there be waivers from the requirement?
 - No.
 - *However*, waivers may be granted to use specific (e.g., retired) versions of standards listed in the Data Catalog.



eStudy Data Guidance (7)

- **Initial Timetable for Requirements**

- ***NDAAs, ANDAAs, certain BLA Submissions***

- Studies that start 24 months after publication of final eStudy Guidance.

- *Start Date defined as by CDISC SDTM Trial Summary Domain*

- Studies must use the standards, formats, terminologies posted in Data Standards Catalog.

- **Certain IND Submissions**

- Studies that start 36 months after publication of final eStudy Guidance.

eStudy Data Guidance (8)

- **Initial Timetable for Requirement – *Example***
 - *November 15, 2014* - Federal Register Notice of final eStudy Guidance
 - *#1- Sponsor starts a study October 22, 2016*
 - *Submission of Standardized Study Data **not required** (but recommended) for that study.*
 - *#2- Sponsor starts a study December 3, 2016*
 - *Submission of Standardized Study Data will be **required** for that study.*
 - *Must use FDA-supported standards, formats and terminologies specified in the Data Standards Catalog.*

eStudy Data Guidance (9)

- **Version Updates**

- Types

- Content or structural changes (e.g., new SDTM domains or variables).
 - Typographical errors, corrections, or clarifications.

- *Federal Register* notice will specify the effective date and will correspond to a specific calendar month, e.g., March.

- Required in submissions for studies starting no earlier than **12 months** after the *Federal Register* notice.

eStudy Data Guidance (10)

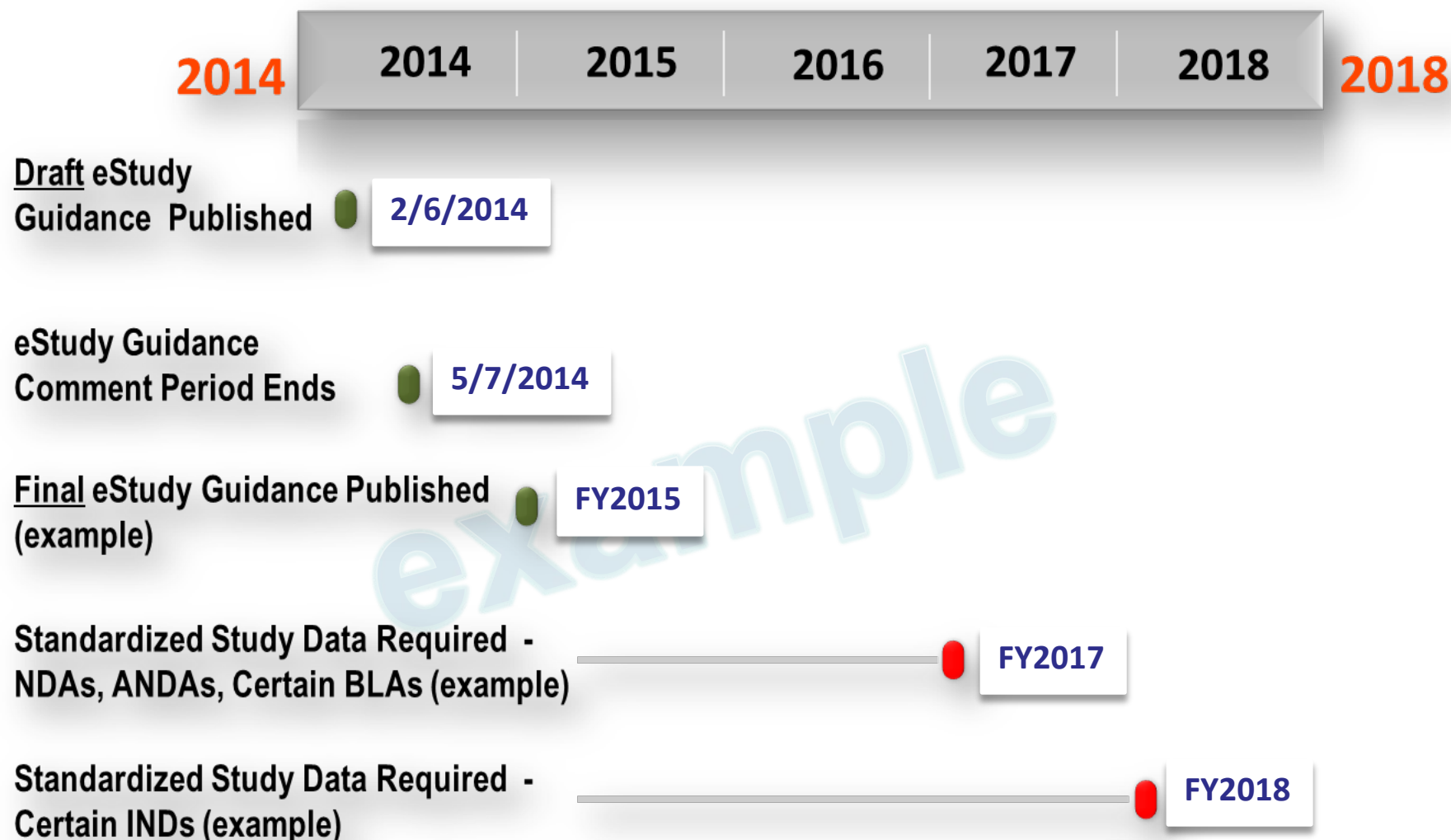
- **Version Updates – *Example***
 - **May 6, 2016**, Federal Register notice - support for new version, SDTM 4.1, and update to the Data Standards Catalog.
 - Effective date posted in the Federal Register notice is **March 15, 2017**.
 - Required in submissions for studies that start after **March 15, 2018**.
 - The Data Standards Catalog will list **March 15, 2018** as the “date requirement begins.”

eStudy Data Guidance (11)

- **New Standards**

- New standards, formats and terminologies
 - Not supported by FDA and
 - Not listed in the Data Standards Catalog when Guidance is final.
- After notice in the Federal Register, required in submissions for studies that start
 - **24 months** (NDAs, ANDAs, and certain BLAs) and
 - **36 months** (for certain INDs).

Milestone Timetable Example



Study Data Tech Conformance Guide

STUDY DATA TECHNICAL CONFORMANCE GUIDE

Technical Specifications Document

This Document is incorporated by reference into the following
Guidance Document(s):

*Guidance for Industry Providing Regulatory Submissions in Electronic
Format – Standardized Study Data*

For questions regarding this technical specifications document, contact CDER at
cdcr-edata@fda.hhs.gov or CBER at cdcr-cdisc@fda.hhs.gov

U.S. Department of Health and Human Services
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February 2014

- **Guide supplements the eStudy guidance.**
- **Provides technical recommendations / specs for e submission of standardized data in INDs, NDAs, ANDAs, and BLAs.**
- **Consolidates Common Issues and Study Data Specs + much more.**

Study Data Tech Conformance Guide

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Next Steps

- **eGuidances**

- Public Comment Period ends May 7th.
- Revise draft documents.
- Publish final documents in FY2015.

- **Other Activities**

- XML Transport Pilot for study data
- Testing & Acceptance project for data standards
- TA project plan update in FY2014
- TA development – internal and CFAST ongoing

Thanks!

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