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Presentation RG08

"What's Rules Got to Do with It?"

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ABSTRACT

This paper outlines how FDA-developed rules are currently used in CDER-specific validation activities.

INTRODUCTION

As of Spring 2018, FDA has developed and published three sets of rules to help sponsors understand how to submit study data that conforms to guidance and supports review. CDER currently uses these rules in validation activities of study data.

BACKGROUND

These three sets of rules are:

1. eCTD technical rejection criteria
    a. https://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM523539.pdf
    b. Managed by Office of Bioinformatics (OBI) in CDER
    c. Used to help monitor incoming study data submissions at the electronic submissions gateway to ensure study data conforms to guidance
    d. Non-compliant applications would be rejected (not formally received or submitted)
    e. Currently, two criteria could result in a technical rejection
    f. 30-day notice to industry before turned on
2. FDA Business Rules
    a. https://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm – (no. 4)
    b. Managed by Office of Strategic Programs (OSP) and Office of Computational Science (OCS) in CDER with multi-Office, multi-Center engagement and governance.
    c. Reflects current business practice and regulatory review requirements
    d. Increases transparency of the business practices of regulatory review
    e. Helps to inform regulatory science and standards development
    f. Human-readable (may not be machine implementable)
    g. Standards agnostic where possible
    h. Aligns with Technical Conformance Guide (TCG)
3. FDA Validator Rules
    a. https://www.fda.gov/forindustry/datastandards/studydatastandards/default.htm – (no. 4)
    b. Managed by Office of Computational Science (OCS) in CDER
    c. Used by OCS Validator using a composite of FDA Business Rules, CDISC Conformance Rules, OCS tool requirements
    d. Multi-Office, multi-Center engagement and governance

The CDER validation activities using these rules are (CBER validation activities covered in separate presentation):

1. At the CDER Electronic Submissions Gateway (ESG) using eCTD Technical Rejection Criteria
2. For test submissions to CDER – clinical and nonclinical
    a. Managed by OBI in CDER
    b. Uses a publicly available validator (P21C v2.2.0) for study data
    c. Shares validator results with sponsor
3. After submission, OCS supports regulatory review of certain applications with tools and services
    a. uses FDA Validator
        i. To assess the loadability of data into OCS tools
        ii. To assess data quality
    b. OCS does not share results with Sponsor

FINDINGS

The Office of Bioinformatics (OBI) at CDER will implement the eCTD technical rejection criteria at the Electronic Submissions Gateway prior to loading into the Electronic Document Room (EDR).

The Office of Bioinformatics (OBI) at CDER implements a publicly-available validation tool to assess study data quality of voluntary test submissions and report findings to sponsors.

The Office of Computational Science (OCS) at CDER validates study data from selected applications against FDA business rules (where machine-readable), CDISC conformance rules (where machine-readable), and OCS tool requirements to inform and support OCS tools and services. OCS does not communicate findings to sponsors.

CBER and CDER are working to align validation activites.