

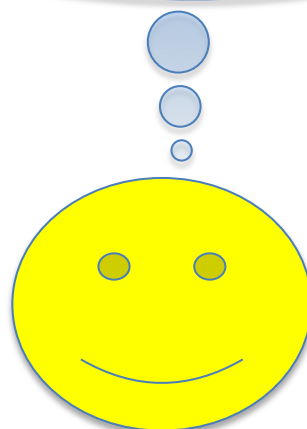
**“This presentation reflects the views of
the author and should not be
construed to represent FDA’s views or
policies.”**

Helena Sviglin, FDA CDER Office of Computational Science, June 2018

WHAT'S RULES GOT TO DO WITH IT?

Bet you're thinking..

Cute title, but what's she talking about?



Objective:

Match Rules to their Activities

Rules

- A. eCTD Technical Rejection Criteria
- B. FDA Business Rules
- C. FDA Validator Rules

Validation Activities

- 1. Gateway
- 2. Test Submissions
- 3. OCS support of review

?





Will cover study data rules developed and maintained by FDA to support regulatory review

A. eCTD Technical Rejection Criteria

<https://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM523539.pdf>

B. FDA Business Rules

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

C. FDA Validator Rules

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

*Won't cover rules **not** developed by FDA*

- CDISC Conformance Rules
- Rules from other regulatory agencies
- Other validators

Will cover validation activities conducted by CDER

1. At the time of submission to the Gateway
2. For test submissions
3. OCS support of review (tools, JumpStart, KickStart, CoreDF)

Rules are used in Validation Activities

“Validation activities occur at different times during submission and review of study data, including submission receipt and at the beginning of the regulatory review.”

Validation activities occur at different times during submission and review of study data, including submission receipt and at the beginning of the regulatory review. Validation of study data that occurs upon receipt of a submission follows the process for [Technical Rejection Criteria for Study Data](#).

The rules below support regulatory review and analysis of study data:

- **Business Rules**

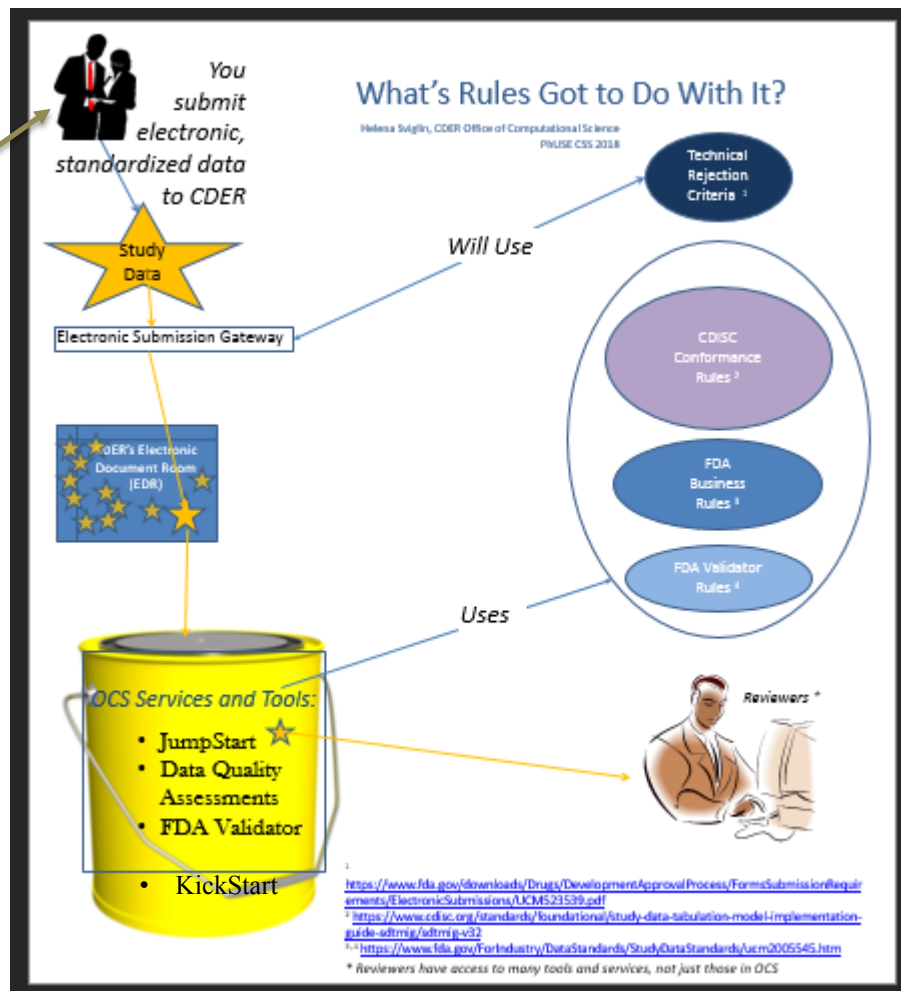
The [Business Rules](#) help ensure that the study data are compliant, useful, and will support meaningful review and analysis. This applies to SDTM formatted clinical studies and SEND formatted non-clinical studies. For more information see Section 8 of the Technical Conformance Guide.

- **Validator Rules**

The [Validator Rules](#) are used by the FDA to ensure data are standards compliant and support meaningful review and analysis.

Rules + Validation Activities

Test submission validation activities not shown on this poster (presented at PhUSE CSS 2018)



Validation Activities

One by One...

(CDER)

Validation Activities

1. At the CDER Electronic Submissions Gateway (ESG) aka 'the Gateway' using eCTD Technical Rejection Criteria



See Ethan Chang's talk at this conference

<https://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM523539.pdf>

Validation Activities

2. For test submissions to CDER – clinical and nonclinical
 - Managed by Office of Business Informatics (OBI)
 - uses P21C v2.2.0 for study data
 - Shares reports with Sponsor

<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/ucm174459.htm>

Validation Activities

3. OCS support of regulatory review (tools and services)
 - After an application has been successfully submitted, OCS supports regulatory review of certain applications with tools and services
 - Uses FDA Validator
 - To assess loadability of data into OCS tools
 - To assess data quality
 - OCS does not share results with Sponsor

Rules

One by One...

A. Technical Rejection Criteria

- Incorporated into eCTD validation at Gateway
- Managed by Office of Bioinformatics (OBI) in CDER
- 30-day notice before being activated

<https://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM523539.pdf>

High Error in Technical Rejection Criteria

- TS.xpt
 - Necessary to supply the study start date
 - determines if standardized, electronic format needed (as per guidance)
- DM.xpt *and* Define.xml
 - must be present for each qualifying study

<https://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM523539.pdf>

B. FDA Business Rules

“The Business Rules help ensure that the study data are compliant, useful, and will support meaningful review and analysis. This applies to SDTM formatted clinical studies and SEND formatted non-clinical studies. For more information see Section 8 of the Technical Conformance Guide.”

<https://www.fda.gov/ForIndustry/DataStandards/StudyDataStandards/ucm2005545.htm>

Why have FDA Business Rules?

- Reflect our current business practice and regulatory review requirements
- Increase transparency
- Inform regulatory science and standards development

More about FDA Business Rules

- Human readable (*may not be machine-implementable*)
- Standards agnostic (*where possible*)
- Not comprehensive (*work in progress*)
- Updated regularly, version-controlled
- Multi-center, multi-office engagement and governance
- Aligns with Technical Conformance Guide (TCG)

C. FDA Validator Rules

- Composite of (where machine-implementable):
 - FDA Business Rules
 - CDSIC Conformance Rules
 - OCS tool requirements
- Has multi-Center, multi-Office governance
- Version control
- *OCS uses FDA Validator and its reports for quality assessments and services to support regulatory review*

Match Rules to their Activities

Rules

Validation Activities

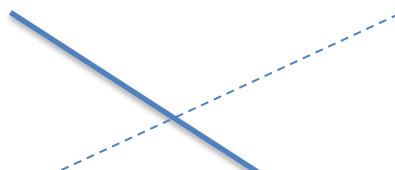
eCTD Technical Rejection
Criteria

Gateway



FDA Business Rules

Test Submissions



FDA Validator Rules

OCS support of review
(FDA Validator)



