e-Data Submission: Uncertainties from Less-experienced Point of View

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Disclaimer

- The contents of this presentation represent the opinions of the individual presenters and do not represent the opinions or positions of the organization to which they belong.
- The contents of this announcement are omitted for convenience of explanation, and may not always contain accurate information.
- The contents of this announcement are based on the application to PMDA.
- The contents of this announcement are based on information as of the end of November 2019, so some of the contents may change due to revisions to notifications.

Purpose of this announcement

- To show you what I actually worked on in preparing electronic data submission.

- To show you what I would like to hear in a panel discussion session.

Agenda

1. Role assignment
2. Quality control of SDTM/ADaM
3. First attempt to create SDTM
4. How to deal with Pinnacle21 errors
5. PMDA　Consultation
6. Summary

1.Role assignment

- Motivation of preparing electronic data submission
  - ➢ Numerous overseas clinical trials
  - ➢ Possibility of exceeding the transition period

- Who led the electronic data submission？
  - ➢ DM

- Preparation of electronic study data
  - ➢ Creation of SDTM and ADaM：Outsource（CRO)
  - ➢ Review of SDTM and ADaM：DM&STAT

※DM：Data Maneger, STAT: Statistician, CRO: Contract Research Organization

2.Quality control of SDTM

1. Accept SDTM mapping specification without checking all the contents.

2. Obtain SDTM dataset.

3. Picked some observation from each domain of SDTM. Confirmed the consistency of Raw data and SDTM data.

Emphasis on data integrity

2.Quality control of SDTM（Data correction）

- If raw data could not corrected, Modified SDTM.
  - ➢Garbled⇒Modified directly.

Before correction	Revised
MHTERM	MHTERM
尋常性?瘡	尋常性ざ瘡

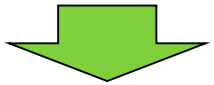
  - ➢Data entry error（Necessary data)
    ⇒Modified using errata file.

  - ➢Data entry error （Unnecessary data）
    ⇒ Deleted directly
      - ✓Not store the wrongly entered data in SUPP domain.

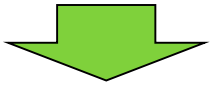
2.Quality control of ADaM

1. Created ADaM from raw data.
   - Validation for ADaM(CRO).
   - Topline results after Key Open.

2. Compared ADaM(CRO) with our ADaM.



ADaM(CRO) had errors in the important data.



CRO modified ADaM(CRO).

- Didn’t notice the error in ADaM(CRO) mapping specification.

3. First attempt to create SDTM

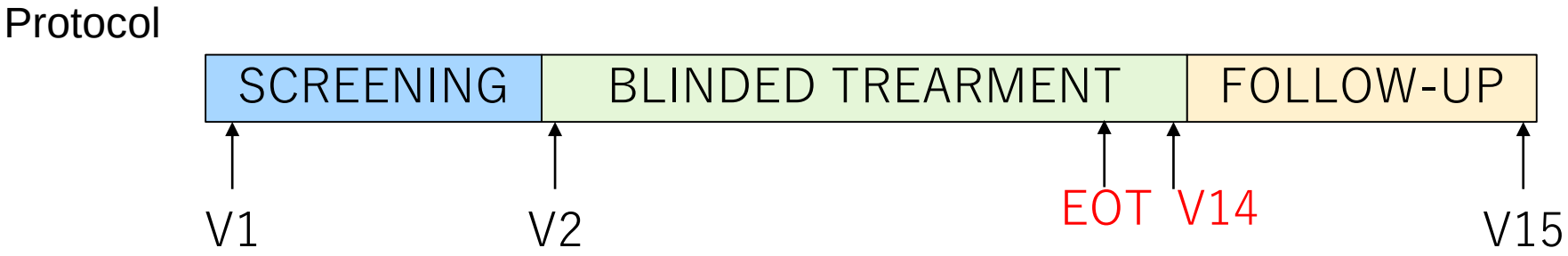
◆ ME-XXXX clinical data package (part)

Study	Phase	Country	CRO	SDTM / ADaM
2	II	US	B	Yes
3	II	JP	–	Creating (Meiji)

- Refer to the most similar study.

- CRO-consultation

3.First attempt to create (Epoch)



- V14 Epoch is “FOLLOW-UP” in SDTM.
- Using RFXENDTC (EOT date) for end date of Blinded Treatment in definition of epoch.
- More reasonable to use non-missing date for reference date.

4.How to deal with Pinnacle21 errors

- The creation of an SDTM based on the SDTM of various studies has the following risks;
  - Inconsistency in definitions between variables
  - Error in the reference source.

- Didn’t determine whether the error that came out was an error that did not need to be corrected.

- Eliminating pinnacle errors and warnings as much as possible.

5.PMDA consultation①

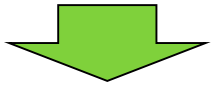
- One pre-consultations with PMDA.
- Indicate whether or not to submit the electronic study data for each clinical data package study.
- Essential to calculate 90% confidence interval for the geometric mean ratio based on FAQ 5-6.
- Give up reanalysis and apply as usual.
  - Old product
  - Too many standard pharmacokinetic studies

5.PMDA consultation②

- Pre-consultations team
  - ➢ Consultation desk：Regulatory affairs（RA)
  - ➢ Material creation：
    - ✓ DM(leader)
    - ✓ STAT
    - ✓ Medical writer
    - ✓ Clinical Pharmacologist
  - ➢ Review the contents of the consultation material
    - ✓ CRO
  - ➢ Attendees：Project Manager, RA, DM, STAT

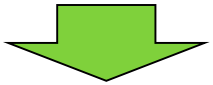
6.Summary

- Good to outsource to CRO
  - First electronic data creation
  - Review of pre-consultations materials.



Commitment to assign proven personnel.

- Collect practical information
  - Actively participate in industry activities



PHUSE Japan working team !

Thank you!!

For any question and comment, please contact takeyuki.shindou@meiji.com