



15th–19th November

EU Connect 2021

The Clinical Data
Science Conference

Electronic Study Data (eData) Submission
experience to PMDA and collaboration
between Japan submission and global team

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Novartis

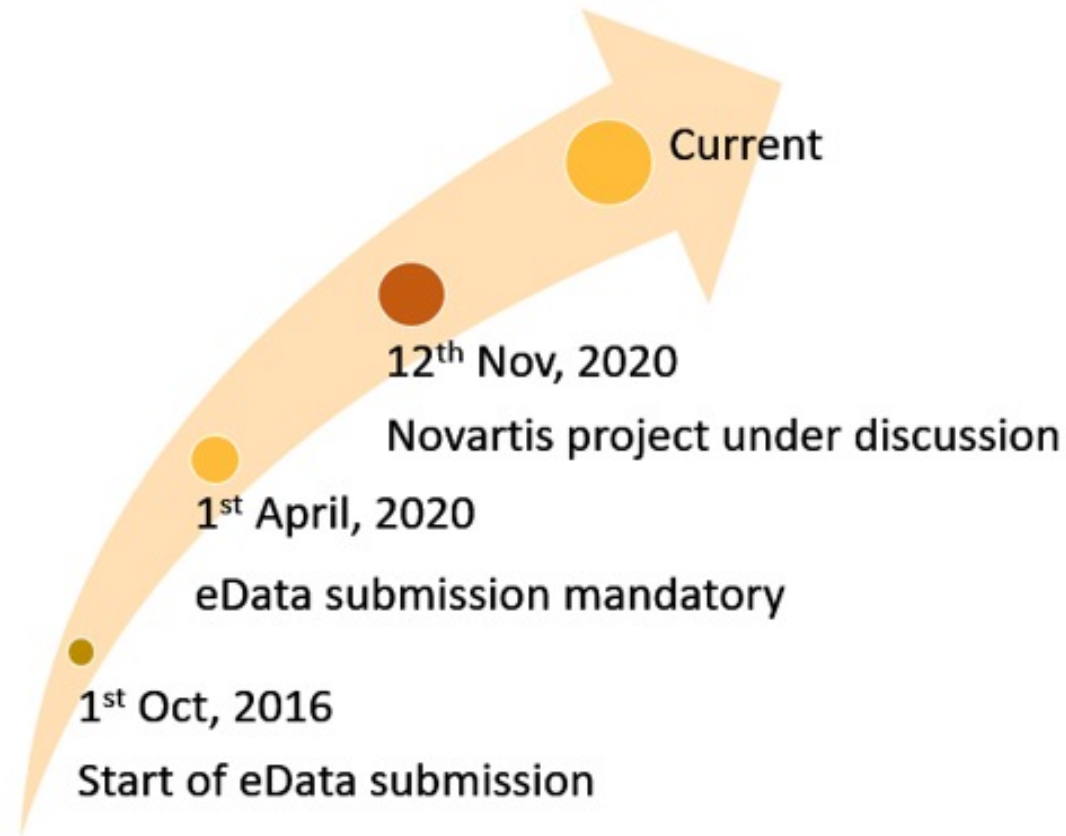
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Agenda

- eDATA submission to PMDA - overview
- Novartis strategy for New Drug Application (NDA)
- Scope of work and challenges
- Project/Deliverable management
 - Time
 - Resource
 - Quality
 - Risk
- Key milestones of actual submission
- Learning and recommendation
- Acknowledgement
- Q&A

eData Submission to PMDA - overview

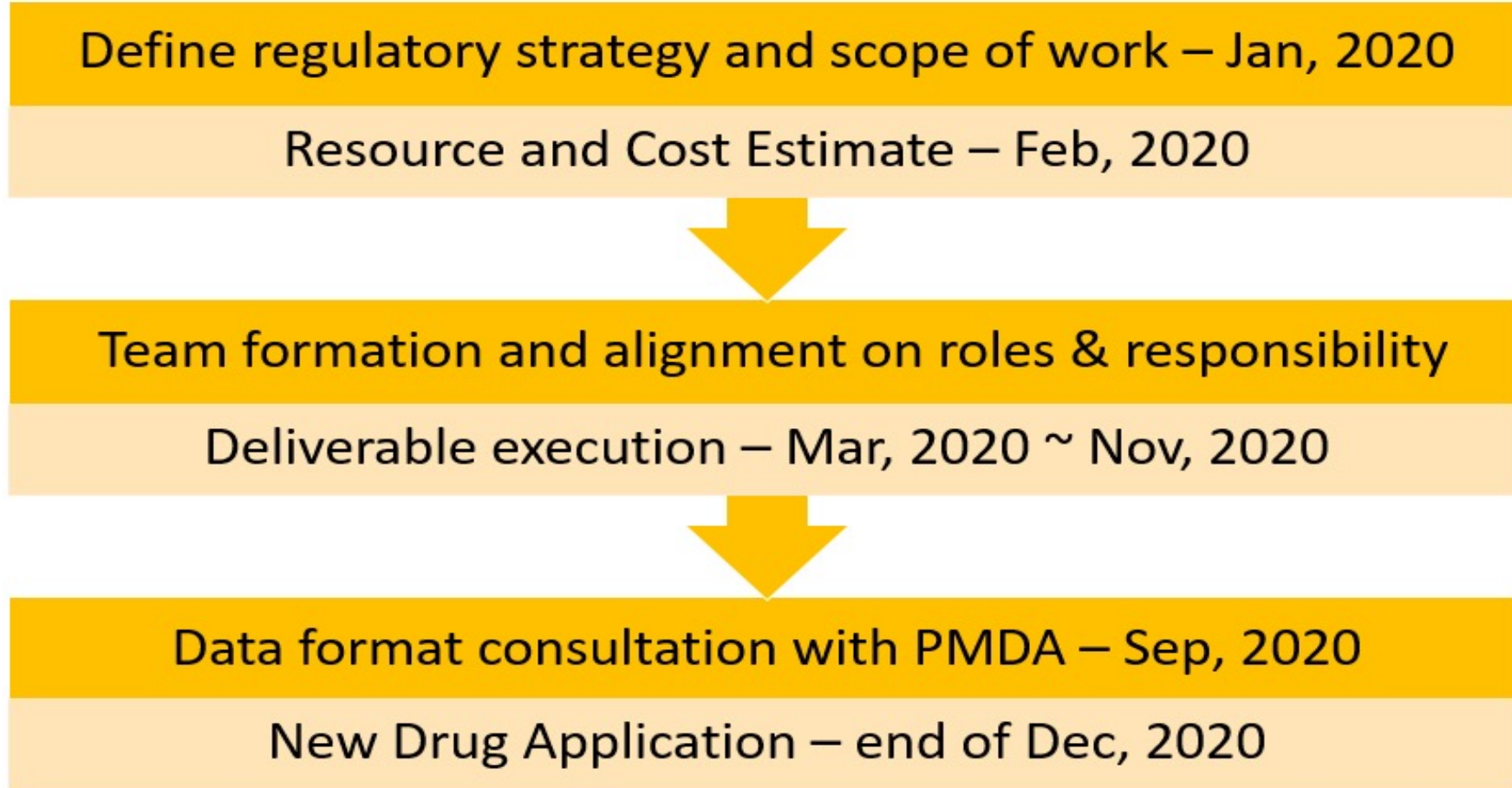


No. of eDATA submission to PMDA by Industry

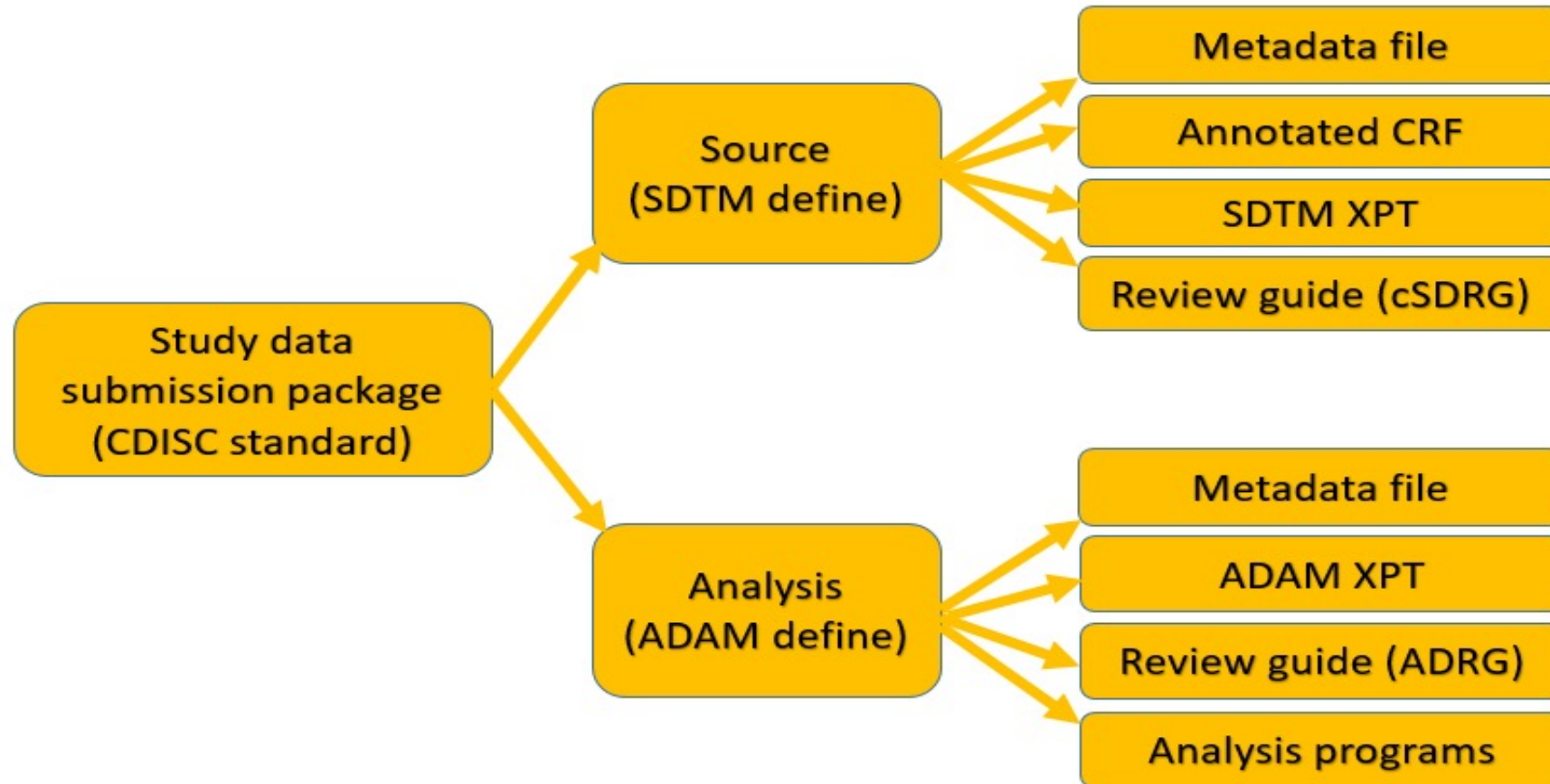
Year	No. of submissions by Industry
2016 (1 st Oct -)	10
2017	31
2018	33
2019	42
2020/21	91 (31Dec, 2020)*

* Including no. of planned submissions

Novartis strategy – roadmap to submission

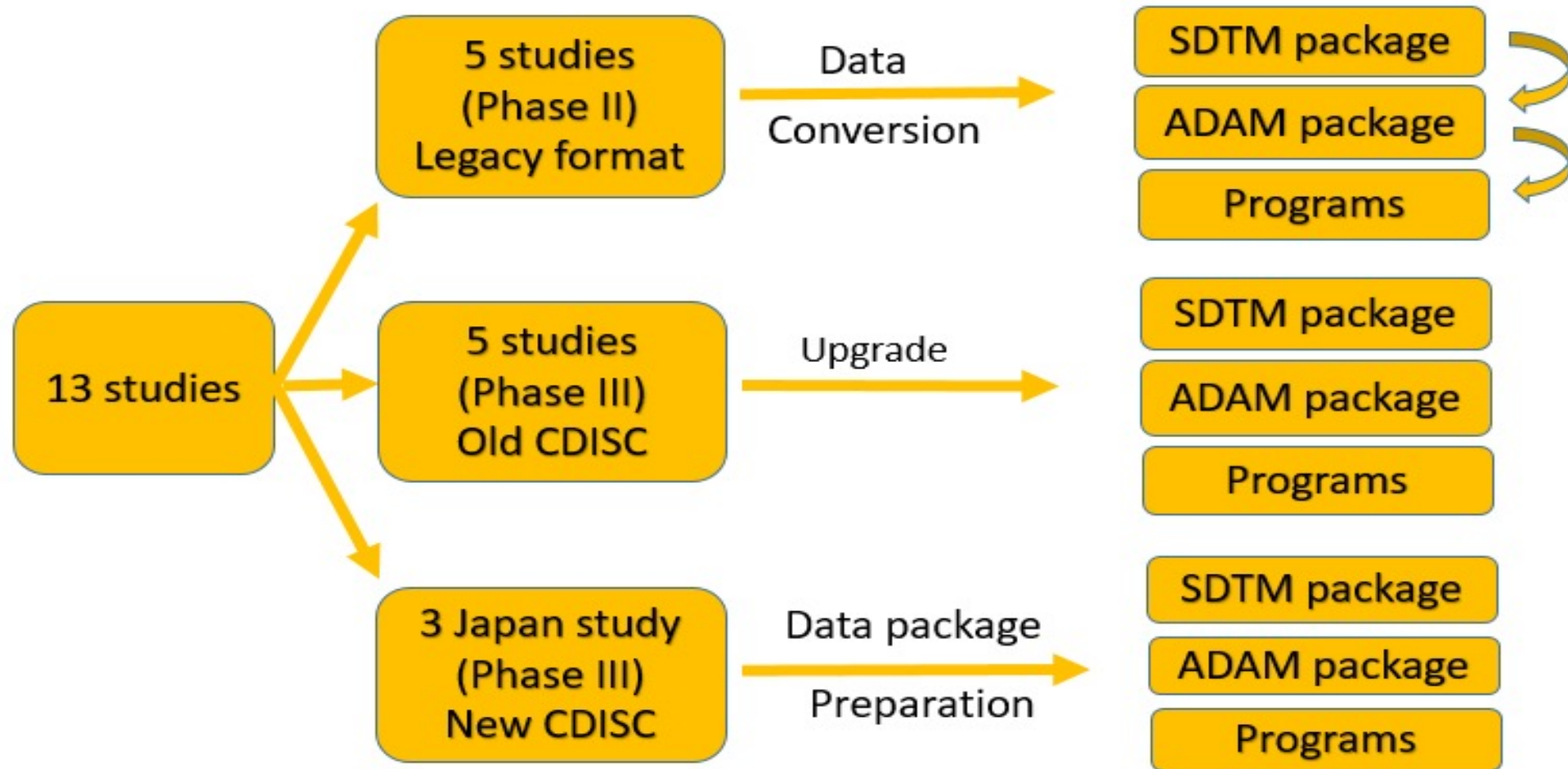


Scope of work – components of a typical package

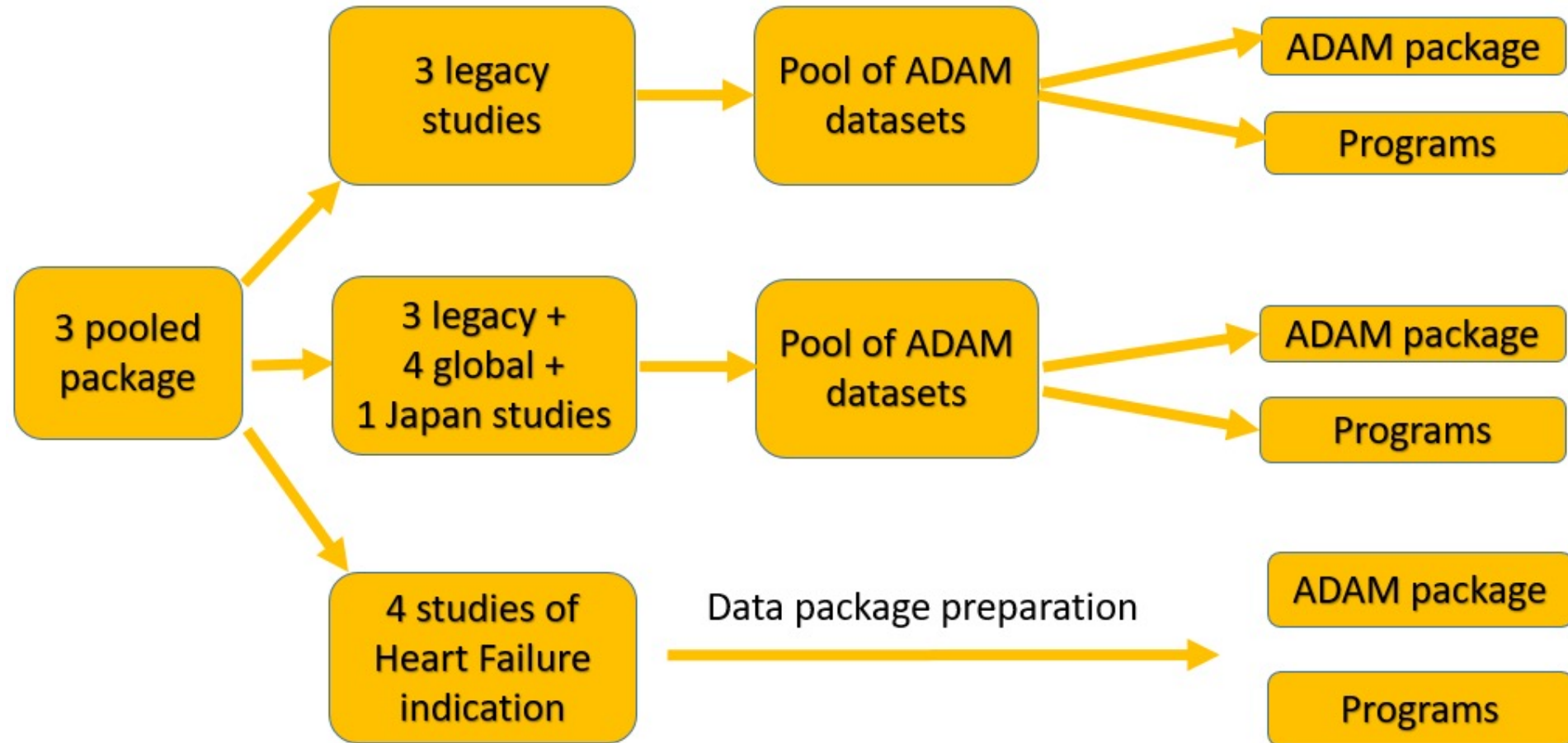


Metadata files are created to facilitate define document creation. These are not submitted to PMDA.

Scope of work – submission under consideration



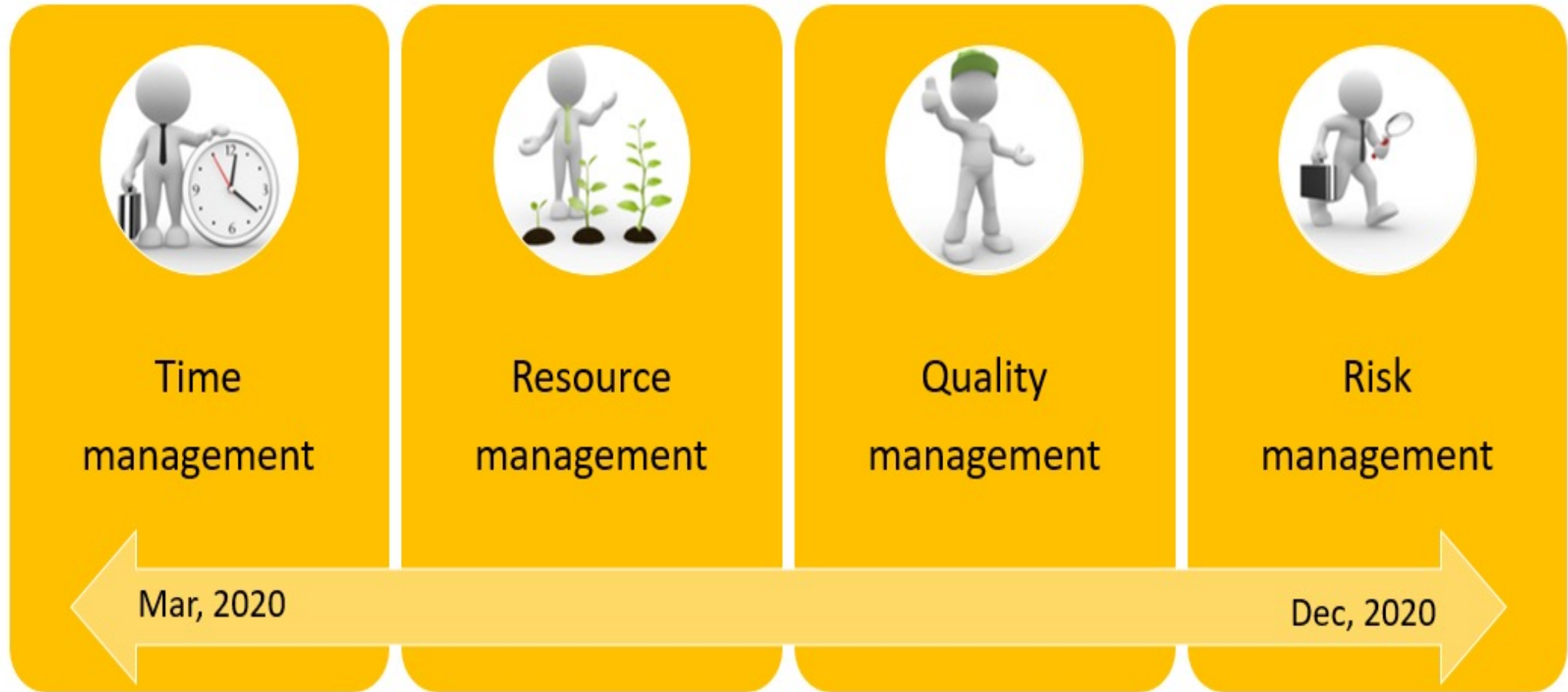
Scope of work – submission under consideration



Challenges/concerns

- To achieve New Drug Application (NDA) by Dec, 2020
- Resource availability, allocation and cost management
- Largest ever data package preparation for any Novartis project submission to PMDA
- Multiple data format and studies were conducted in different periods/years
- Multiple teams and stakeholders from different geographic locations
- Deliverable preparation risks
- Quality and Risk management

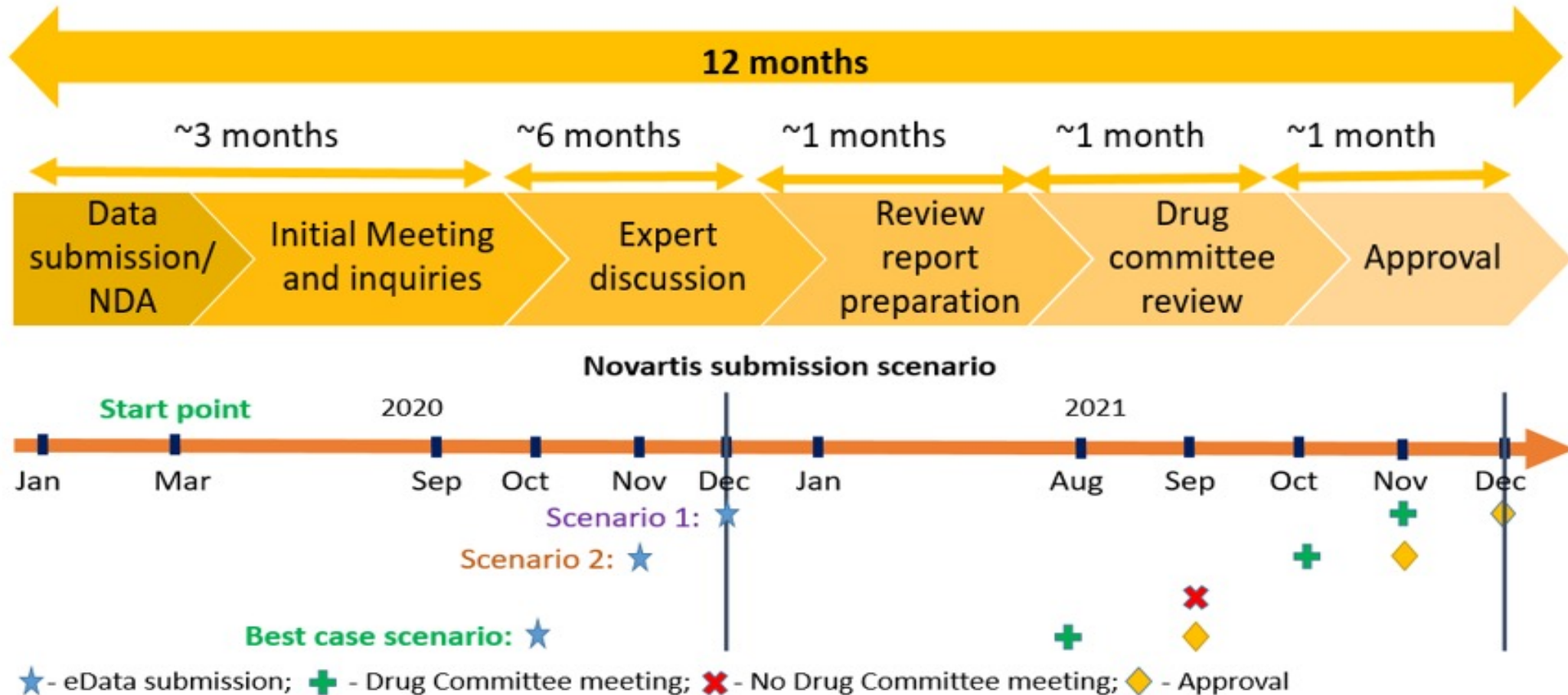
Project/Deliverable management



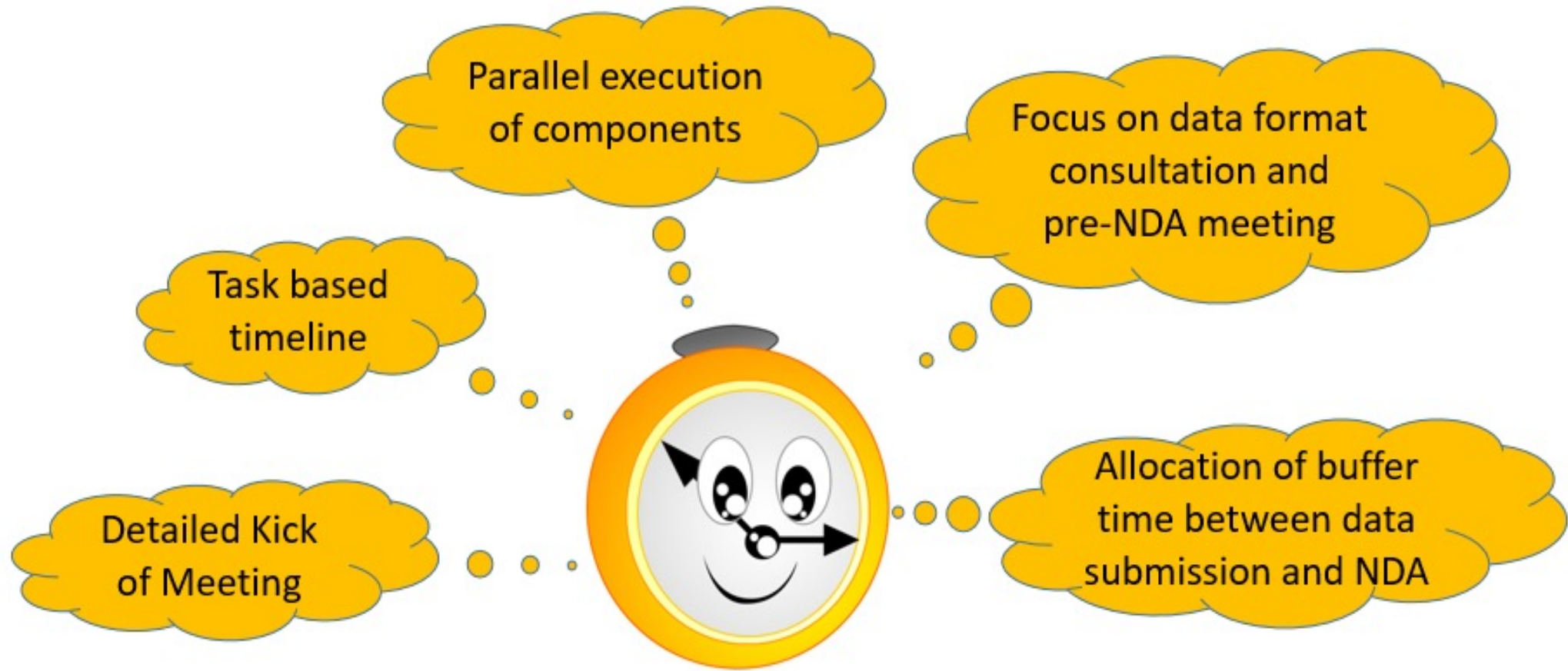
Time management



Time management – why so important?



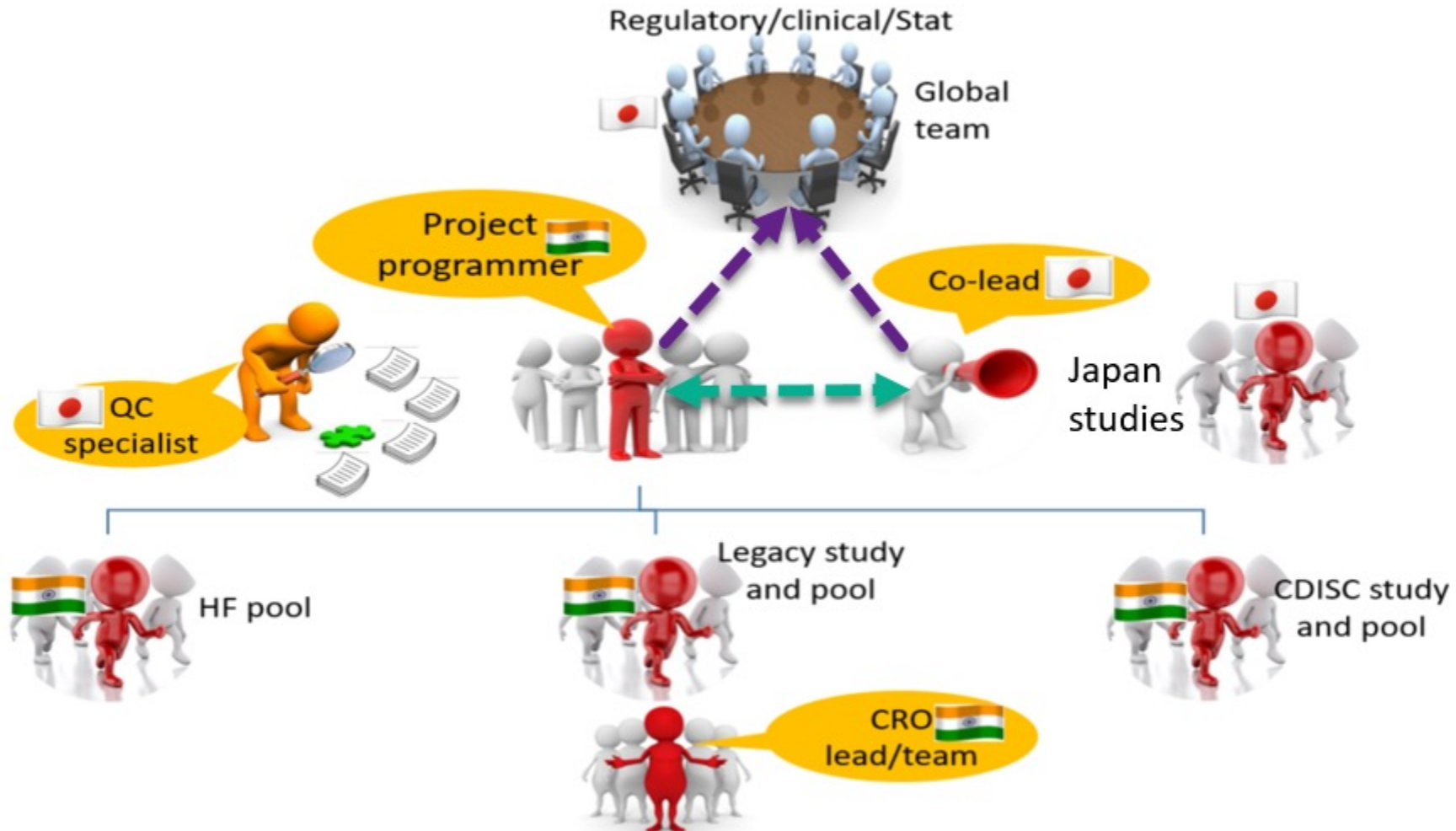
Time management – how?



Resource management



Programming and submission team



Resource management - concern



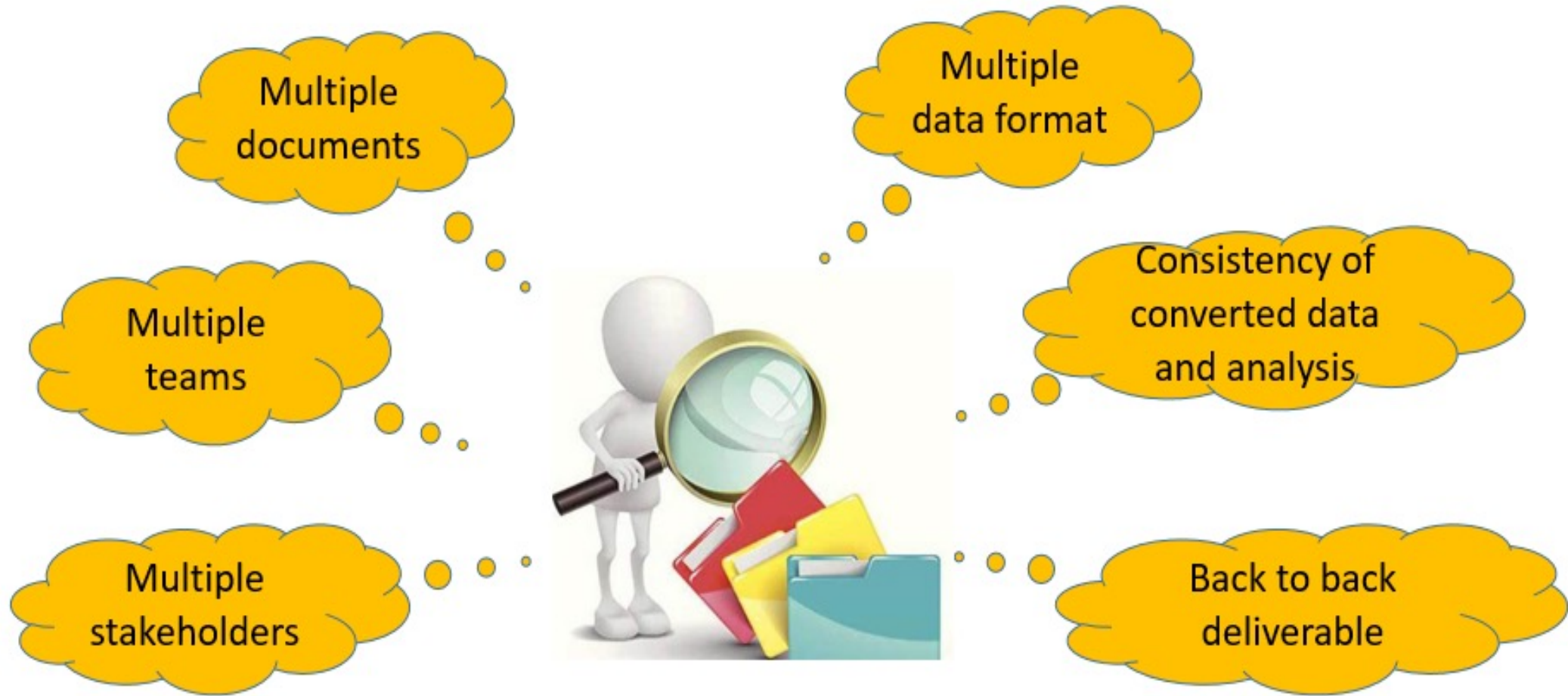
Resource challenge – mitigation



Quality management



Quality management - concern



Quality assurance

Quality check of key
derivation

Reproduced key safety
and efficacy analysis

Subjective error
explanation

Collaboration with
Japan team

Documentation of
resolution

Document review
by QC specialist



Risk management



Associated Risks



Risk mitigation

Discuss errors of all packages in data format consultation meeting

Data validation done in PMDA equivalent platform

Continuous progress monitoring and resourcing

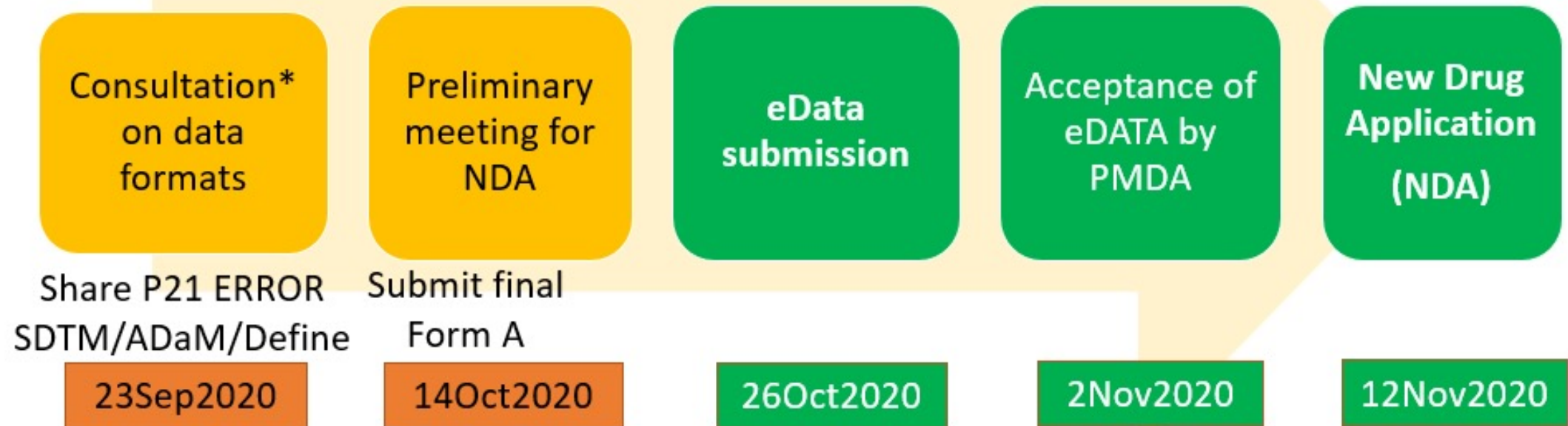


Communication of decision through lead in weekly meeting

Mention data package size in consultation document

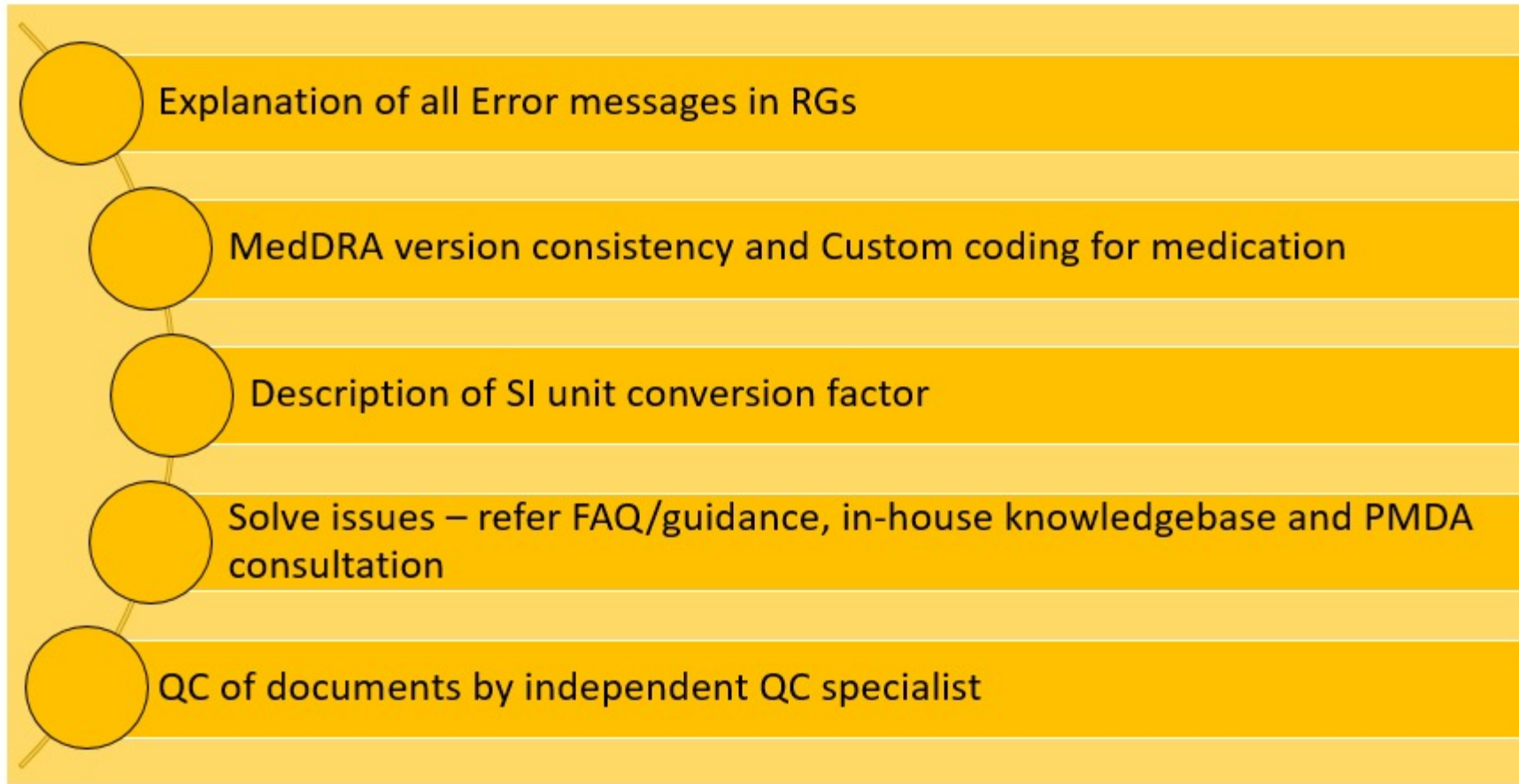
Actual submission

We achieved NDA 1 and half month ahead of initial plan!!!



* 1st Apr, 2021 onwards P21 error and resolution (Form A) need to be discussed at pre-NDA meeting.

Learning and experience



Learning and experience - examples

Error explanation example

Domain/ Dataset	Error no.	Issue	Explanation 	Detailed explanation 
CM	SD0035	Dose unit missing	Eligible unit to be selected is not part of list of values to be selected in CRF.	For few records, the eligible dose units were not part of codelist in CRF. Hence from site the unit variable (CMDOSU) was reported as missing. Dose unit was not part of any analysis and hence no impact in analysis.
ADLB	AD0124	Different category for same parameter	PARACAT1 has different values to identify Serum and Urine pregnancy test.	Pregnancy test was performed using Urinalysis and Chemistry. For both these tests at source PARAMCD='HCG'. The records for these test results were differentiated using PARCAT1='URINALYSIS' and PARCAT1='CHEMISTRY' respectively.

Learning and experience - examples

Form A

データセット Dataset	提出するものにチェック 記載。使用するバージョンでド メインに正式採用されてい ない場合にはカスタムドメイン 欄に記載すること。 Need to check for dataset to be submitted	該当する場合にチェック 欄に記載			備考
		SUPP	日本語 使用	SUPP 日本語 使用	
AE	☒	☒	☐	☐	
CE	☐	☐	☐	☐	
CM	☒	☒	☐	☐	
CO	☒	☒	☐	☐	

SDRG

Table 3-1 List of SDTM Subject-Level Domains

Dataset – Dataset Label	Efficacy	Safety	Other	SUPP –	Custom	Related Using RELREC	Observation Class
AE - Adverse Events		X		X			Events
FAAE - Findings About Adverse Events		X		X			Findings
CM - Concomitant Medications		X		X			Interventions
CO - Comments			✓	✓			Special Purpose

External Dictionaries

SDTM
define

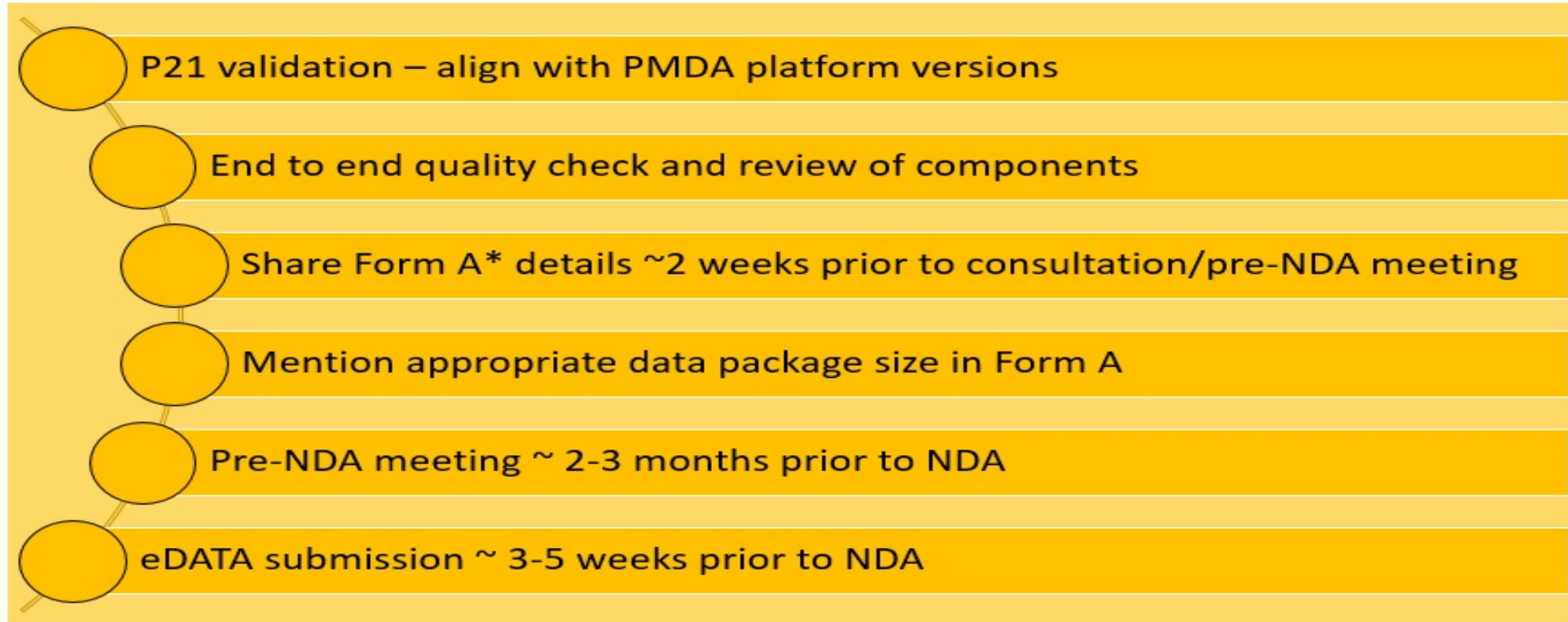
Reference Name	External Dictionary	Dictionary Version
MedDRA Dictionary (CL.MedDRA)	MedDRA	15.1
WHO Drug Dictionary (CL.WHODRUG)	WHO DD	(NovDTD) version 12.3, based on WHO-DDE Version March 2012

External Dictionaries

ADAM
define

Reference Name	External Dictionary	Dictionary Version
MedDRA Dictionary (CL.MedDRA)	MedDRA	16.0
WHO Drug Dictionary (CL.WHODRUG)	WHO DD	(NovDTD) version 12.3, based on WHO-DDE Version March 2012

Recommendation



* Form A is a document (in Japanese) that details key summary of study/pool (e.g. compound, study name, endpoint, population etc), data standards information (dictionary versions, list of datasets, explanation of all error messages), data package sizes, Operating System and Software versions used to prepare data package.

Acknowledgment

I would like to thank my colleagues and mentors (list below) who supported the preparation of the presentation and Novartis management for providing the opportunity to present at EU connect, 2021.

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