



Working Together: The Evolving Relationship of Biostatistics & Regulatory for Support of Study Data Standardization Plans and BIMO Reviewer's Guides

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Presentation Overview



Study Data Standardization Plan

a brief history...

- A document that describes a Sponsor's **intended** use of FDA endorsed data standards
- Purpose: Influence a Sponsor to meet FDA expectations for standards deployment or make a compelling argument for why they feel they can't
- Origin
 - FDA implemented a CRADA ~2011 that involved them working with an organization to lead them through an opportunity to create and utilize data based on CDISC standards to support specific meta-analyses
 - The pain of this experience influenced the specification of the SDSP as well as the Reviewer's Guides that accompany SDTM & ADaM submission data packages
 - PHUSE/CSS WG Optimizing the Use of Data Standards efforts led to formally published templates and guidelines for the SDSP & Reviewer's Guides

BIMO Reviewer's Guide

a brief history...

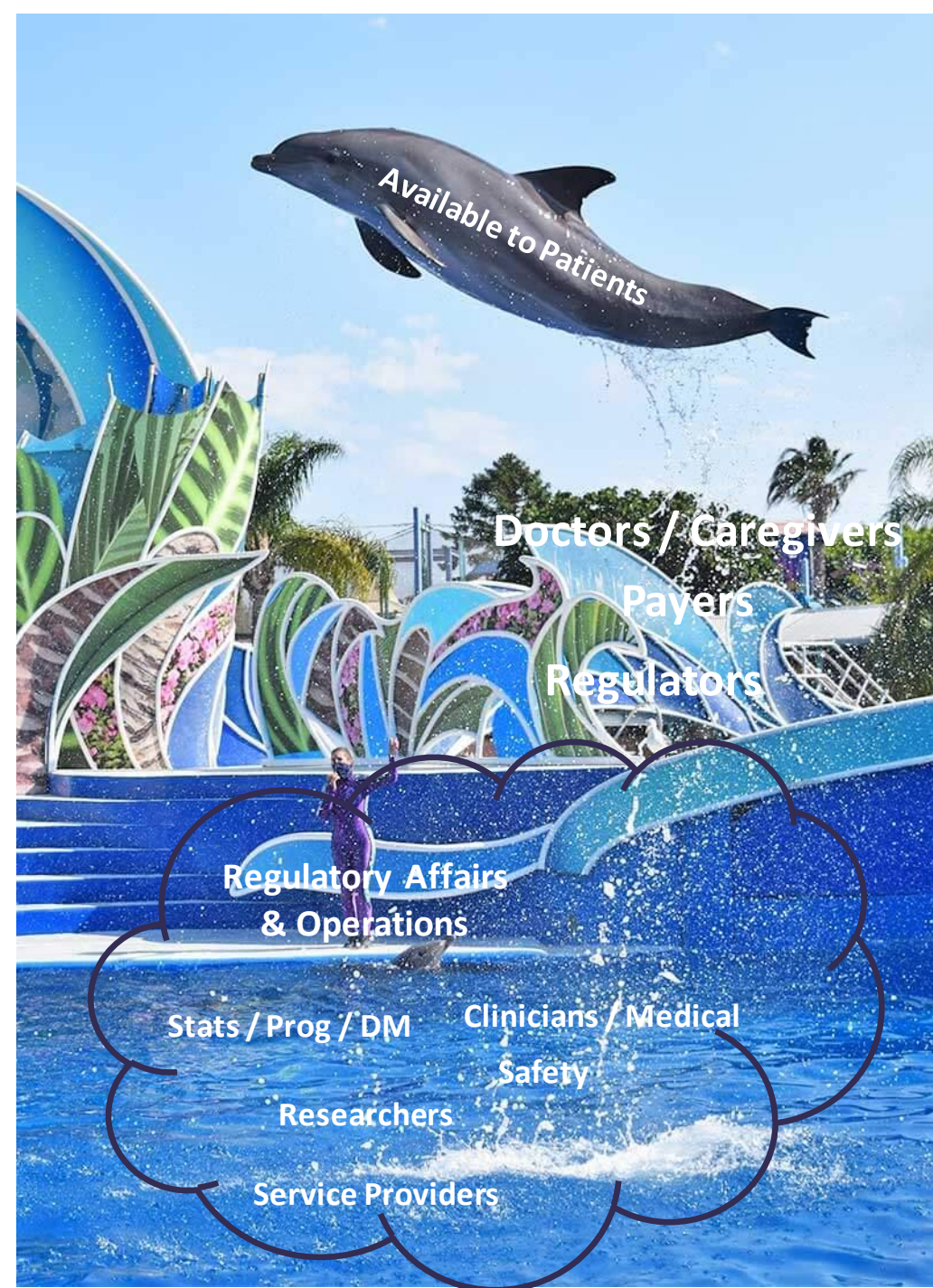
- BIMO Package – Goal to develop a more consistent, science-based approach to selection of clinical sites for inspection
 - Tabular list of site information
 - Line listings by site
 - Site level data
- Origin
 - 1st requested in 2010 via Type C meetings
 - 1st draft guidance issued in 2012; replacement draft guidance issued in 2018
 - 1st BIMO TCG issued in 2017, revised in 2020 & 2022 (note: not a draft guidance)
- BIMO Reviewer's Guide – Template/guideline/examples released by PHUSE in 2022

Why are we having this conversation?

- FDA impetus for these documents came from outside the eCTD guidance
- Template and process for creating the SDSP & BIMO assets was designed and implemented by Clinical Data Scientists
 - Outcome from workstreams from PHUSE/CSS meetings managed by Optimizing the Use of Data Standards working group
- Statisticians / Programmers / Data Managers were telling Sponsor Regulatory Affairs/Regulatory Operations that these items needed to be included in a submission
- Initially Sponsor Regulatory Affairs/Regulatory Operations viewed these documents as the domain of Statisticians / Programmers / Data Managers, much like Submission Data Packages

What changed?

- US FDA started **asking** for SDSP & BIMO
 - SDSP @ time of PreIND meeting, no later than EOP2 meeting
 - BIMO strategy typically @ PreNDA/BLA meeting, sometimes as early as the EOP2 meeting
- Sponsor Regulatory Affairs / Operations now on notice to provide these assets
- Led to a desire for **ownership** of these documents by Sponsor Regulatory Affairs / Operations



Now what?

- As Sponsor Regulatory Affairs/Regulatory Operations peeled back the onion layers on the documents, they realized they had a vested interest in **content**, not just existence
- SDSP
 - Overview
 - Interaction documentation
- BIMO
 - Messaging
 - Service Providers
 - Financials

Now what?

- Coordination of document creation – not just a Stats / Programming / DM activity
- SDSP
 - Non-clinical
 - Clinical
- BIMO
 - Trial Management (delegation of study responsibilities)
 - Trial Master File (site information, financials)

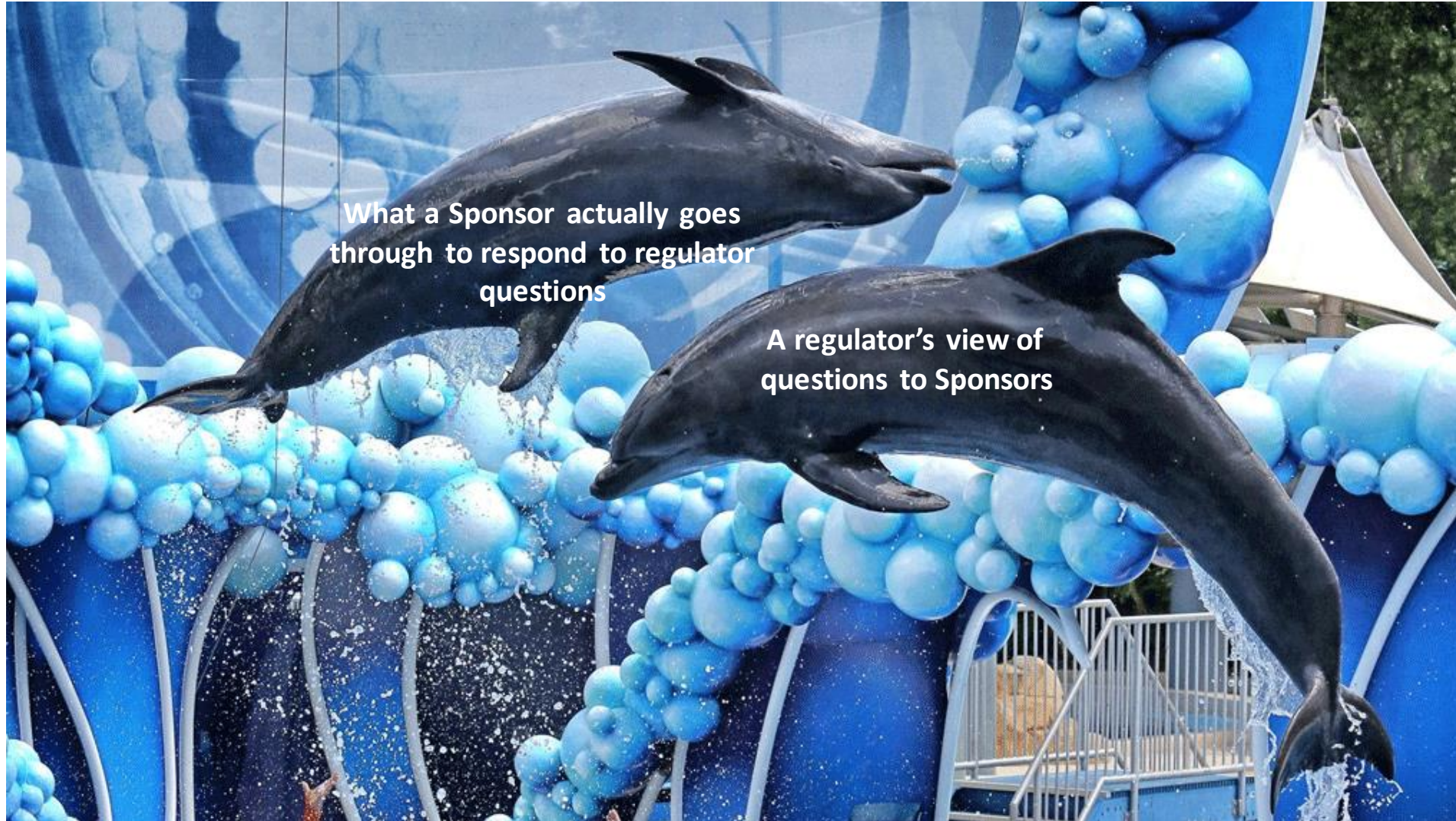
Evolution of the Process

- Coordinating author assigned
 - Someone who **specializes** in regulatory document authoring
- Content providers defined; content developed
 - Stats / programming / data management can **focus** on their content
- Cross checks defined and executed
 - List of sites from CTMS compared to clinical db
 - Studies in SDSP compared to submission content plan
- Seamless publishing into eCTD

The Future

- PHUSE templates for SDSP & BIMO Reviewer's Guide universally available
 - Made available as templates in Regulatory application
 - Joint authoring - single document universally available to all authors

Thank you!



What a Sponsor actually goes through to respond to regulator questions

A regulator's view of questions to Sponsors

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