

Analysis Data Reviewer's Guide Completion Guidelines

Version 1.2

Revision History

| Version | Date | Summary |
|---------|------------|--|
| 1.0 | 2014-05-15 | Initial published version. |
| 1.1 | 2015-01-26 | This version includes many formatting changes in the ADRG_Template document, updated instructions in this Completion Guidelines document, and updates to the sample ADRG documents to reflect the changes to the template. |
| 1.2 | 2019-07-12 | <p>Updated to be in compliance with the TCG (October 2018) and to add completion guidelines for the Legacy Data Conversion Plan and Report Appendix.</p> <ul style="list-style-type: none">• ADRG Overview:<ul style="list-style-type: none">○ Added a footnote for a PhUSE White Paper.○ Added verbiage regarding an integrated Reviewer's Guide○ Documented which sections are required and which ones are optional.○ Added verbiage for the Legacy Data Conversion Plan & Report Appendix.• Template Completion Instructions:<ul style="list-style-type: none">○ Section 1.1 – Added guidance for the Legacy Data Conversion Plan & Report Appendix.○ Section 1.2 – Added standard acronyms when the Legacy Data Conversion Plan & Report Appendix is included.○ Section 1.3 – Added guidance to be consistent with the cSDRG regarding deviations from controlled terminology. |

| Version | Date | Summary |
|---------|------|---|
| | | <ul style="list-style-type: none"> ○ Section 1.4 – Added verbiage and new example regarding the inclusion of the Legacy Data Conversion Plan & Report Appendix. ○ Section 3.5 – Added questions to additional content ○ Sections 4.1, 4.2, and 4.3 – Added verbiage to not delete these sections. Also added example text when the sections do not contain content. ○ Section 5.1 – Added guidance for questions that were moved from Section 3.1 in the previous template to this section. <ul style="list-style-type: none"> ▪ Added guidance for questions that were moved from Section 3.1 in the previous template to this section. ▪ Moved guidance around additional content regarding convention variables and timing variables to Section 3.5. ○ Sections 5.2, 5.2.1, and 5.2.x - Added guidance to be consistent with the cSDRG regarding deviations from controlled terminology. ○ Section 6 – Updated guidance based on format change. ○ Section 6.2 – Updated the table to be consistent with the cSDRG. ○ Section 7 – Added standard text and new tables to describe the programs. The standard text is in alignment with the TCG (Section 4.1.2.8 and 4.1.2.10). ● ADRG Template updates: <ul style="list-style-type: none"> ○ Added the template date to the cover page ○ Section 1.1 – Added verbiage for the Legacy Data Conversion Plan & Report (LDCPR) ○ Section 1.2 – Added acronyms for LDCP flows ○ Section 1.3 – Added additional standards ○ Section 1.4 – Added verbiage for LDCPR ○ Section 3.1 (Comparison of SDTM and ADaM Content) to Section 5.1 ○ Section 3.2 <ul style="list-style-type: none"> ▪ Added <Yes/No> to questions and <insert additional text here> ▪ Added a question about treatment grouping variables ▪ Removed bullet points to be consistent with Section 6.1 ○ Section 3.3 – Added verbiage to not delete the section ○ Section 3.4 – <ul style="list-style-type: none"> ▪ Added <Yes/No> to questions and <insert additional text here> ▪ Removed bullet points to be consistent with Section 6.1 ○ Section 3.5 <ul style="list-style-type: none"> ▪ Added <Yes/No> to questions and <insert additional text here> ▪ Moved text from Section 4.4 (Variable Conventions) to this section ▪ Removed bullet points to be consistent with Section 6.1 ○ Sections 4.1-4.3 – Added verbiage to indicate if no datasets were created. ○ Section 5.1 <ul style="list-style-type: none"> ▪ Added <Yes/No> to questions and <insert additional text here> ▪ Removed bullet points to be consistent with Section 6.1 ○ Section 6.1 – Updated format of the section and removed specific product names ○ Section 6.2 – Updated table to be consistent with cSDRG ○ Section 7 – Updated to be in compliance with the TCG ○ Added the LDCPR Appendix |

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Analysis Data Reviewer's Guide Completion Guidelines Overview

Analysis Data Reviewer's Guide Purpose

The Analysis Data Reviewer's Guide (ADRG) provides FDA Reviewers with additional context for analysis datasets (AD) received as part of a regulatory submission. The ADRG is intended to describe analysis data submitted for an **individual study** in the Module 5 clinical section of the eCTD. The ADRG purposefully duplicates limited information found in other submission documentation (e.g., the protocol, statistical analysis plan, clinical study report, define.xml) in order to provide FDA Reviewers with a single point of orientation to the analysis datasets. The submission of a reviewer's guide does not obviate the requirement to submit a complete and informative define.xml document to accompany the analysis datasets. For further information about the ADRG, please refer to the FDA Study Data Technical Conformance Guide¹.

Where some of the information is duplicated, it is advised to avoid redundancy between the ADRG and the define.xml). A white paper² has been published that discusses this topic and is available on the PhUSE site for reference.

The ADRG template has been utilized in the past to document information regarding multiple studies when an integrated database was created for ISS/ISE purposes. A template will be created by PhUSE for these purposes.

ADRG Overview

The ADRG has seven required sections:

- Introduction
- Protocol Description
- Analysis Considerations Related to Multiple Analysis Datasets
- Analysis Data Creation and Processing Issues
- Analysis Dataset Descriptions
- Data Conformance Summary
- Submissions of Programs

The ADRG also has two optional sections:

- Appendix (for other documentation that would be helpful to a reviewer)
- Legacy Data Conversion Plan & Report Appendix

The Introduction provides an overview, an inventory of standards used on the study, and describes the source data used to create the analysis datasets. The Protocol Description provides a brief orientation

¹ <https://www.fda.gov/downloads/ForIndustry/DataStandards/StudyDataStandards/UCM624623.pdf>

²

<https://www.phusewiki.org/docs/Deliverables/Best%20Practices%20for%20Documenting%20%20Dataset%20Meta%20data%20-%20Define-XML%20versus%20%20Reviewers%20Guide%20-%202005APR2019.pdf>

to the study and describes how planned treatment and timing variables relate to the study design. The Analysis Considerations Related to Multiple Analysis Datasets section provides an overview of topics relevant to multiple datasets such as a description of core variables appearing on most datasets, a comparison of data appearing in source (SDTM) versus analysis datasets, subjects requiring special analysis rules, windowing rules, and imputation/derivation methods. The Analysis Data Creation and Processing Issues section describes split datasets, data dependencies, and intermediate datasets. The Analysis Dataset Descriptions section provides an overview of the analysis datasets with additional detail beyond that found in the define.xml where warranted. The Data Conformance Summary describes how ADaM conformance was assessed and summarizes conformance findings. The Submission of Programs section itemizes the programs that are included in the submission. An optional Appendix section may be included if needed to document any additional information that would be helpful to a reviewer). The ADRG assumes that SDTM is used as input to the creation of analysis datasets and that the analysis datasets adhere to the ADaM standard to the largest extent possible. The Legacy Data Conversion Plan and Report Appendix is needed in the event a sponsor has converted non-SDTM data to ADaM.

ADRG Completion Guidelines Purpose

The purpose of this document is to provide sponsors with a clear, concise set of instructions that facilitates the consistent development of the ADRG from the Analysis Data Reviewer's Guide Template. In addition to the ADRG Completion Guideline, ADRG examples are available as an additional reference.

Organization of This Document

This document has three sections: this guideline overview, ADRG Template Completion Instructions, and ADRG Finalization Instructions. The section number in the ADRG Template Completion Instructions corresponds directly to the ADRG Template. The ADRG Finalization Instructions describe how to format the document for submission after completing the ADRG Template.

Analysis Data Reviewer's Guide Template Completion Instructions

This section provides companion instructions for the ADRG Template. The section numbering corresponds directly to the ADRG Template. **Note: Certain ADRG Sections include a series of questions intended to aid FDA Reviewers. Provide complete answers to all questions. Do not delete the primary questions from the final document.**

1. Introduction

1.1 Purpose

This required section states the purpose of the ADRG. Please refer to the ADRG Template for standard text. If legacy tabulation was converted to SDTM and then to ADaM, or legacy analysis data was converted to ADaM, include the sentence in the template related to the conversion.

1.2 Acronyms

This optional section documents any industry standard acronyms, sponsor-specific or non-industry standard acronyms used in the ADRG. . If including the Legacy Data Conversion Plan & Report Appendix, include the acronyms aCRF, eCRF, and eDT as appropriate.

| Acronym | Translation |
|---------|-------------|
| | |
| | |
| | |

1.3 Study Data Standards and Dictionary Inventory

This required section documents the ADaM, SDTM, and Define version(s) used in the study. The versions specified for SDTM in this ADRG should match exactly with the similar information found in the Clinical Study Data Reviewer's Guide (cSDRG). Version(s) of conformance checks are documented in Section 6. Include the versions of SDTM and ADaM controlled terminology, if applicable.

Document any custom Controlled Terminology terms that could apply to more than one domain (e.g.APHASE). If custom terminology is specific to a domain, document that in Section 5.2.

Document the version of the TAUG used, if applicable.

Document the versions of the Medications Dictionary and Medical Events Dictionary (Initial and Final to be in alignment with the Study Data Standardization Plan).

Do not delete any rows. If the information is not applicable, signify with "NA".

Versions of standard published questionnaires, scoring algorithms, or other published standards used for analysis should be mentioned within the section pertaining to the analysis datasets in which the standard occurs.

Document any custom Controlled Terminology terms that could apply to more than one domain (e.g.APHASE). If custom terminology is specific to a domain, document that in Section 5.2.x.

Example:

| Standard or Dictionary | Versions Used |
|-----------------------------|---|
| SDTM | SDTM v1.3/SDTM IG v3.1.3 |
| SDTM Controlled Terminology | 2016-09-30 |
| ADaM | ADaM Model Document 2.1 ADaM Implementation Guide v1.0 ADaM Data Structure for Adverse Event Analysis v1.0 ADaM Basic Data Structure for Time-to-Event Analysis v1.0 |
| ADaM Controlled Terminology | 2016-09-30 APHASE has values of SCREENING, TREATMENT, FOLLOW-UP across all applicable domains. |
| Data Definitions | define.xml v2.0 |
| TAUG (if applicable) | N/A |
| Medications Dictionary | WHO Drug Enhanced B2 Format 2016-06-01 |
| Medical Events Dictionary | Initial:MedDRA 19.0 Final: MedDRA 19.0 |
| Other standards (optional) | N/A |

End Example

1.4 Source Data Used for Analysis Dataset Creation

This section is used to describe the type of data sources used to create the analysis datasets. Whereas this ADRG was developed with the assumption that SDTM was the source of data for analysis dataset creation, it is recognized that submissions continue to be made where the source may be SDTM, a non-SDTM clinical database or a combination of these. The purpose of this section is to provide a high level introduction to the types of data used for analysis dataset creation. If SDTM was used as the sole source of data for the development of analysis dataset, then a simple sentence stating this fact is sufficient.

Otherwise it is beneficial to highlight other sources and reference sections below where more information can be found or describe in here if no other section provides the necessary content.

In cases where legacy tabulation data is converted to SDTM and then to ADaM, or legacy analysis data is converted to ADaM, include a reference to the Legacy Data Conversion Plan & Report Appendix. Please note that if an ADaM model/IG is no longer supported as noted in the Data Standards Catalog, a conversion to the supported model/IG is necessary and should be described in the Legacy Data Conversion Plan & Report Appendix.

Content may include but is not limited to the following:

- ✓ In the case of a study which is ongoing or has an ongoing follow-up component, the data cutoff rules may be described.
- ✓ If there are any special cases of data supplied, they should be described here. For example, in some cases sponsors may create customized lookup tables in order to classify certain data, such as adverse events of special interest.
- ✓ There could also be cases where adjudication information was supplied, such as by a clinical review panel. This section can describe the data handling methods used for the adjudicated data. It is not necessary to restate any discussion of the adjudication process that may be contained in the statistical analysis plan (SAP). If there is a Section 5.2.x that specifically addresses the dataset in which adjudicated results are found, then this could be referenced here.

Following are examples of the type of statements that might be included in this section.

Example 1:

“The source data for the ADaM datasets were SDTM version 3.1.3. The protocol for this study consisted of a double blind phase, an open label follow-up phase, and an extended follow-up phase which was used to gather additional survival information. The source data includes all data for the double blind and open label phase, as well as any extended follow-up information that was available as of 31JAN2013. “

Example 2:

“The source data includes all data that were available as of 31JAN2013. However, the sponsor was notified of 3 deaths that occurred after this date. Due to the importance of death information to this analysis, death information only had a separate cutoff date of 30APR2013. “

Example 3:

“In addition to the clinical database, the source data contains file ADJUCRES which contains the results of the clinical outcome review committee meeting held on 14Jul2012. The data supplied to the committee and the review methodologies are described in SAP section 10.5.2. The source files for the review included AE and CE. The adjudication results were entered manually by the committee chair and the results were reviewed and signed off by committee members as described in the protocol. The adjudication records may be linked to the source records using key variables USUBJID, AESPID, AESEQ. They were used to derive the efficacy dataset ADEFF.”

Example 4:

“In addition to the clinical database, the source data contains file AEEOI which is used as a dictionary of adverse events of special interest. Since this study has a particular concern regarding specific cardiac events, those specific events are flagged for analysis in the adverse events file. These events were identified after the database was locked and MedDRA coding was applied, and before unblinding. Events were identified by generating a spreadsheet of all unique AEDECOD values. This list (which contained no subject or treatment identifying information) was reviewed by two clinical investigators and each term was assigned a flag value for the special interest category (Y or N). The spreadsheet was converted to a dataset and used to apply the flag value to all adverse event records.”

Example 5:

“The ADaM datasets were derived from legacy analysis datasets. The datasets were derived from the final locked database. Please refer to the Legacy Data Conversion Plan and Report Appendix for additional details.”

2. Protocol Description

2.1 Protocol Number and Title

This section provides the protocol number or identifier, title, and versions included in the submission. For protocol amendments, note changes that significantly affected data interpretation or analysis, if any. If an amendment did not significantly affect data analysis, it is not necessary to note.

2.2 Protocol Design in Relation to ADaM Concepts

This section describes how standard ADaM analysis variables relate to the protocol design. For example, variables such as planned treatment assignments (TRTxxP, TRTSEQP), analysis phase (APHASE), analysis period (APERIOD), subperiod (ASPER), cycle (ACYCLE), etc. are defined in ADSL and other analysis datasets and help define how a particular observation relates to treatment and timing in a protocol. The manner in which these variables are defined for a given study aid the understanding of how the protocol design relates to key analysis concepts used in ADaM. Note that the ADaM model does not regulate how these variables are defined and used to produce a given analysis. Because the terms ‘phase’ and ‘period’ are not used in a standard fashion across the industry within the text of a protocol or statistical analysis plan, it is useful to describe how the standard ADaM variables relate to key analysis concepts.

These variables can be described textually and/or via annotation onto a protocol schema.

The textual and the pictorial examples below are for illustrative purposes only:

Text Example:

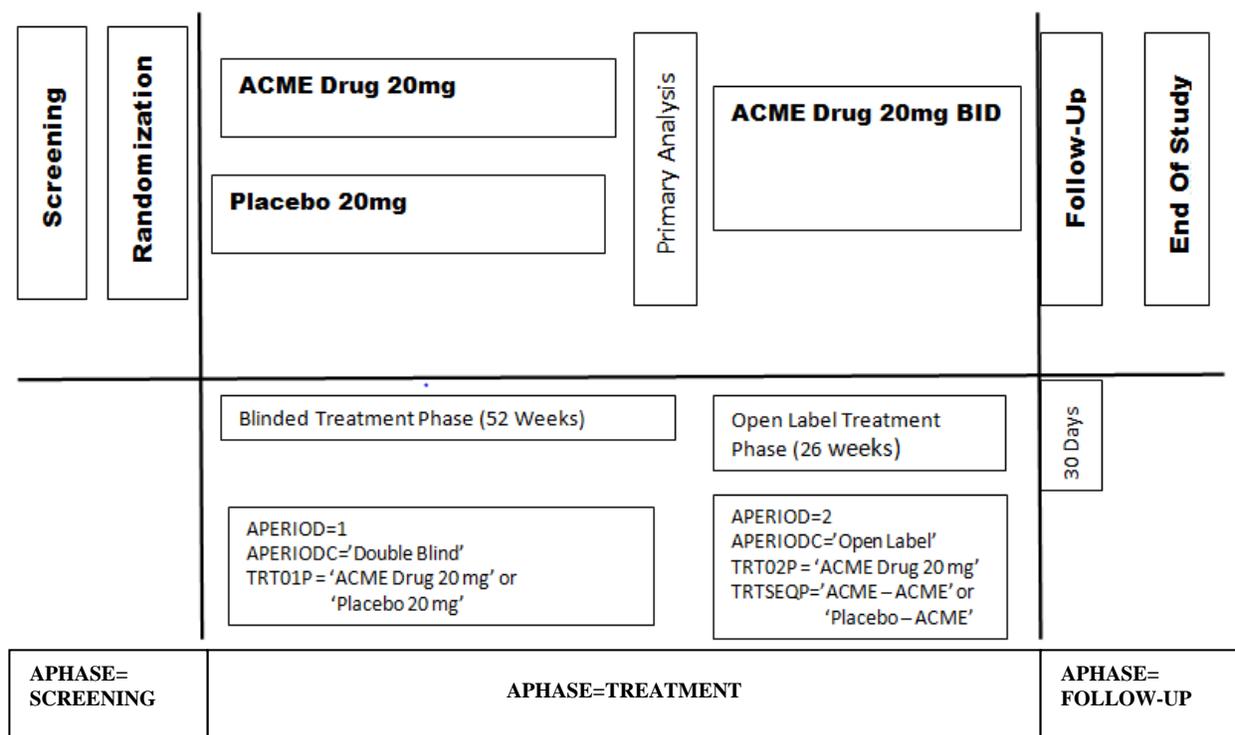
This is a two arm randomized double-blind to open-label study. APERIOD is used to describe the double-blind period (APERIOD=1) and the open label period (APERIOD=2). TRT01P represents the treatment to which a subject was randomized at the start of the double-blind period and TRT02P represents the open

label treatment. The variable TRTSEQP provides a description of the sequence of planned treatments from double-blind to open-label. Records collected prior to randomization are considered to be APHASE=Screening, all records collected during double-blind or open label have APHASE=’Treatment’ and records collected during the 30 day follow-up have APHASE=’Follow-up’

Table Example:

| Arm | Treatment Assignment |
|--------|-------------------------------------|
| TRT01P | ACME Drug 20 mg or Placebo 20 mg |
| TRT02P | ACME Drug 20 mg |

Pictorial Example:



3. Analysis Considerations Related to Multiple Analysis Datasets

3.1 Core Variables

Core variables are those that are represented across all/most analysis datasets. The designation of ‘core’ is given to a variable that is useful for nearly all analyses (such as age group, sex, race, treatment

arm) and/or serves as an important reference variable (such as studyid). If core variables are defined, then a table with the core variable name and a brief description is required.

Since both USUBJID and STUDYID are required by the ADaM model, then at a minimum, this table would contain these two variables.

Example:

| Variable Name | Variable Description |
|---------------|---|
| USUBJID | Unique subject identifier |
| STUDYID | Study identifier used for this protocol |
| SITEID | Unique site identifier for the investigator site |
| COUNTRY | Country code using ISO |
| ARM | Planned treatment arm from SDTM |
| TRT01P | Randomized treatment description |
| SEX | Sex |
| AGEGRP1 | Age group (<65 and >=65) |
| RACE | Race description |
| ITTFL | Flag to indicate inclusion ('Y') or exclusion ('N') from the intent to treat population |
| HBA1CBL | Baseline value of HbA1C which is used as a covariate in all efficacy analyses |

3.2 Treatment Variables

This section provides information specific to the comparison of the values of SDTM and ADaM treatment variables and the use of planned and actual treatment variables in the analyses. The following questions must be answered. Italicized text is included for guidance. Additional information may be added below these required questions as needed.

ARM versus TRTxxP

<<The purpose of this section is to describe / contrast values of ARM vs. TRTxxP.>>

Are the values of ARM equivalent in meaning to values of TRTxxP?

If yes, state this here.

If no, explain the relationship in text or tabular form.

Table Example:

| ARM | Treatment Assignment |
|--------|-------------------------------------|
| TRT01P | ACME Drug 20 mg or Placebo 20 mg |
| TRT02P | ACME Drug 20 mg |

ACTARM versus TRTxxA

<<*The purpose of this section is to describe / contrast values of ACTARM vs. TRTxxA.*>>

If TRTxxA is used, then are the values of ACTARM equivalent in meaning to values of TRTxxA?

If yes, state this here.

If no, explain the relationship in text or tabular form.

If TRTxxA was not used, then state this here.

Table Example:

| ACTARM | Treatment Assignment |
|--------|-------------------------------------|
| TRT01A | ACME Drug 20 mg or Placebo 20 mg |
| TRT02A | ACME Drug 20 mg |

Use of ADaM Treatment Variables in Analysis

<<*The purpose of this section is to describe the use of planned and actual treatment variables in the analysis*>>

Are both planned and actual treatment variables used in analyses?

If no, state this here.

If yes, explain at a higher level (e.g., across safety, efficacy) planned versus actual treatment for each type of analysis.

Use of ADaM Treatment Grouping Variables in Analysis

<<*The purpose of this section is to describe the use of planned and actual treatment grouping variables in the analysis*>>

Are both planned and actual treatment grouping variables used in analyses?

If no, state this here.

If yes, explain at a higher level (e.g., across safety, efficacy) planned versus actual treatment grouping for each type of analysis.

Refer to the appropriate part(s) of Section 5 for use of ADaM treatment variables within individual datasets.

3.3 Subject Issues that Require Special Analysis Rules

This section provides a description of any situation that occurred which affects the analysis of an individual subject. If there are no issues, then state this. Content may include but is not limited to the following:

- ✓ Did subjects receive the wrong treatment entirely compared to assigned randomization? If yes, how many and explain the deviation(s).
- ✓ Did subjects receive the wrong treatment and/or wrong dose at least once, but not entirely from what was expected per the assigned randomization? If yes, indicate how many subjects received wrong treatment and/or wrong dose and how to identify these subjects and how it affected the analysis.
- ✓ Did subjects have incorrectly defined randomization strata? If yes, how many and how it affected the analysis.
- ✓ Describe whether any subjects were excluded from analysis datasets (other than screen failure exclusions describe in Section 3.1) and the rationale for the exclusion.
- ✓ Did subjects switch sites? If yes, describe how it was handled in the analysis.
- ✓ Were subjects randomized multiple times at different sites? If yes, give details on how this was handled in the analysis. Note that if this occurs, then the same USUBJID should be used all records for a given subject. If this is not the case, it would be important to note.
- ✓ Were there any protocol deviators that were handled differently in the analysis than what was expected per the definitions in the SAP? If yes, provide details.

3.4 Use of Visit Windowing, Unscheduled Visits, and Record Selection

This section provides an overview of how the observed visit records from SDTM were used in the analysis. Content should include but is not limited to the following:

Was windowing used in one or more analysis datasets?

If no, then state this here.

If yes, then were the same rules applied to all analysis datasets?

If yes, then describe how to determine which records were used for analysis.

If no, refer to Section 5.2.x as appropriate for each individual analysis dataset.

Were unscheduled visits used in any analyses?

If no, then state this here.

If yes, then refer to Section 5.2.x as appropriate.

Additional content may include but is not limited to the following:

Were there records which are included in one or more analysis datasets that were never used for any analysis (such as after follow-up period, screening, etc.)?

3.5 Imputation/Derivation Methods

This section provides an orientation to the use of record level imputation or derivation and the use of associated ADaM variables.

If date imputation was performed, were there rules that were used in multiple analysis datasets?

If yes, then either point the reviewer to the location of the description of these common rules in the specific section of the SAP (for example 'see Section 9.3 in SAP') or describe the rules here. Include in which analysis datasets these common rules were applied.

If common date imputations were not done but imputations were specific to individual analysis datasets, then refer reader to the appropriate part(s) of Section 5 for more information regarding specific analysis datasets where these imputations occurred.

Additional content may include but is not limited to the following:

- ✓ Was DTYPE used in one or more analysis datasets?

If yes, describe the controlled terminology and associated definitions. Consider referencing SAP if appropriate.

- ✓ Was BASETYPE used in one or more analysis datasets?

If yes, describe the use of BASETYPE and provide controlled terminology and definitions. Consider referencing SAP if appropriate.

- ✓ Was ONTRTFL used in one or more analysis datasets?

If yes, describe the use of ONTRTFL and provide definitions. Consider referencing SAP if appropriate.

- ✓ Was TRTEMFL used in one or more analysis datasets?

If yes, describe the use of TRTEMFL and provide definitions. Consider referencing SAP if appropriate.

- ✓ Description of the algorithms followed to calculate timing variables used across analysis datasets (e.g., ADY). These should align with the definitions in define.xml.
- ✓ Discussion of any differences between SDTM and ADaM in the definitions of derived variable concepts (for example, baseline (xxBLFL versus ABLFL), actual study day (xxDY versus ADY), population flags (SAFETY versus SAFFL)).

- ✓ Discussion of any other flagging variables across analysis datasets, in particular those which are not used routinely or require additional information to aid interpretation.
- ✓ Discussion of any imputed assessment values across analysis datasets (e.g. LOCF).
- ✓ Document any deviations from Controlled Terminology described in Section 1.3, if further explanation is needed, or not described in Section 1.3. Also, explain the reason for the deviation. This applies to extensible and non-extensible codelists within CDISC Controlled Terminology. It is understood that a validator may flag this. However, it may not explain the reason for the deviation.
- ✓ Document any other variable conventions used by a sponsor that cannot be easily established in the define.xml. Explain at a higher level the rationale for using certain standard or additional variables. The variables described should be those that are over and above the conventions specified in any of the CDISC ADaM documentation. For example, if a sponsor has used conventions for particular variables across analysis datasets, such as ANLzzFL or other common used flag variables, AVISIT:AVISITN, PARAM:PARAMCD, etc, these can be described here. It may also be useful to discuss how the setup of certain variables supported analysis.
 - Following is an example of the type of statements that might be included in this section.
 - “Study ABC1234 included one subject (USUBJID='abc-7023') who had dosing errors in the first cycle of treatment. This subject was randomized to active treatment but actually received placebo for the first cycle. For this reason, all safety-related analysis datasets included the record-level treatment variables TRTA and TRTAN. In safety analysis tables, subjects are categorized by the actual treatment at the time of the observation. Tables that summarize data by cycle will show a change in subject count from cycle to cycle and are footnoted accordingly.”

4. Analysis Data Creation and Processing Issues

4.1 Split Datasets

This section is intended for use when the sponsor must split an analysis dataset for submission due to size constraints. It is required if any analysis data was split for submission but is optional otherwise. The sponsor should clearly describe the method by which the dataset was split (e.g., by parameter) and notify reviewers of the need to reassemble the analysis dataset prior to any analysis.

If there is no information for this section, **do not delete it**.

Example 1:

| Source Dataset | Split Dataset | Split Value |
|----------------|---------------|----------------------|
| ADLB | ADLB01 | PARCAT1 = Chemistry |
| ADLB | ADLB02 | PARCAT1 = Hematology |

“The Laboratory analysis dataset (ADLB) was split due to size constraints. Reviewers who wish to execute the SAS programs provided for safety laboratory analysis (see Program Inventory in section 7) should first reassemble the two datasets into a single dataset named ADLB. The metadata describing laboratory chemistry results is described under dataset ADLB in the define.xml.”

Example 2:

“No datasets were required to be split due to 5 GB size constraints.”

Note that descriptions of decisions regarding how to organize source data for analysis are out of scope for this section. This type of information may be presented in Section 5. For example, source data for laboratory results may be submitted in a single LB dataset, but for analysis, the data may be organized into separate analysis datasets by hematology, chemistry, etc. and in so doing may avoid the need to split the ADaM dataset.

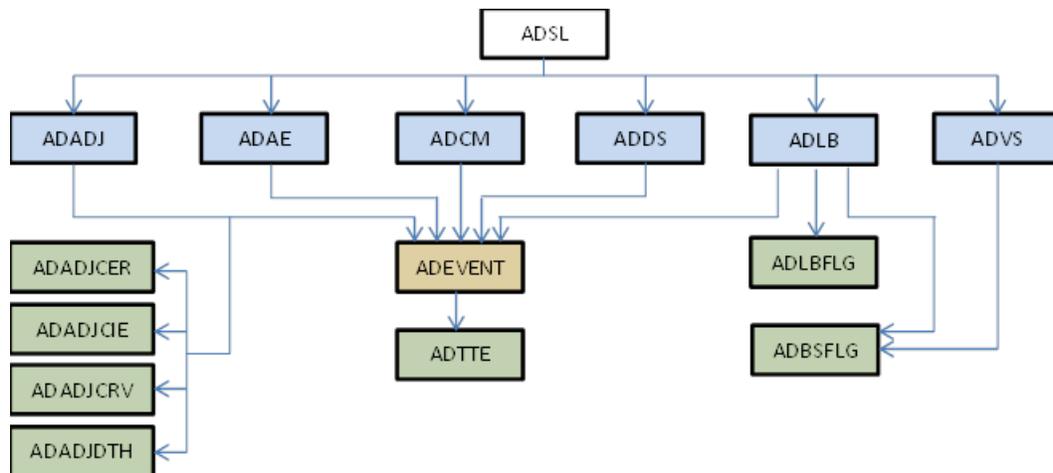
4.2 Data Dependencies

This section is used to describe any dependencies between analysis datasets. A flowchart is recommended when there are dependencies between analysis datasets beyond a dependency on ADSL. In the case of very minimal analysis dataset dependencies, the user may opt for creating a table to explain the dataset dependencies as an alternative to a flow chart. Where no dependencies exist between analysis datasets beyond a dependency on ADSL, then a simple statement asserting that fact is recommended. Dataset dependencies involving the creation of intermediate analysis datasets should be noted here and further described in Section 4.3, Intermediate Datasets as appropriate.

If there is no information for this section, **do not delete it**. Following are examples of the type of information that might be included in this section.

Example 1

In this diagram, blue is used to indicate datasets that have dependency only on ADSL, green indicates dependency on other analysis datasets, and yellow indicates intermediate datasets that were not used for any analysis.



Example 2:

| Dataset | Input Datasets |
|---------|------------------|
| ADTTE | ADAE, ADCE, ADSL |

Example 3:

There are no analysis dataset dependencies other than ADSL.

4.3 Intermediate Datasets

This section is used to describe the existence of intermediate analysis dataset(s) and the resultant analysis dataset(s). Intermediate datasets may have been created during the trial to handles cases when working with complex derivations and/or when a smaller dataset was created from the larger parent analysis parent for reporting purposes and internal review. If applicable, describe any naming convention used for interim datasets. Anything that requires a clinical review to set a flag, such as protocol deviations to determine if the deviation is major or minor, may require an intermediate dataset.

If there is no information for this section, **do not delete it**.

Following are examples of the type of information that might be included in this section.

Example 1:

| Intermediate Dataset | Output Dataset |
|----------------------|----------------|
| ADEVENT | ADTTE |

Example 2:

| Intermediate Dataset | Output Dataset(s) |
|----------------------|-------------------|
| ADEX | ADEXCYCL, ADEXTOT |

Example 3:

“Dataset ADEX is not used in analyses, but is supplied to provide traceability for ADEXCYCL and ADEXTOT and used for a listing. The source data were collected using a per-dose case report form page, which recorded the actual amount infused. The ADEX intermediate file was used to convert actual amounts infused to actual amounts in mg/kg using the last available body weight. This file was then used to create ADEXCYCL which summarizes the total amount received per treatment cycle, and to account for interruptions and changes in dosing regimens. ADEXCYCL was then used to derive summary variables in a one-record-per-subject structure, stored in ADEXTOT.”

Example 4:

“No intermediate analysis datasets were created in this trial.”

5. Analysis Dataset Descriptions

5.1 Overview

This required section provides a summary orientation to the analysis datasets.

Answers to the following question must be provided:

Are data for screen failures, including data for run-in screening included in ADaM datasets?

If yes, refer reader to the appropriate Section 5.2.x below for individual datasets that contain screen failure and/or run-in failure data.

If no:

- if screen failure/run-in data are in SDTM but not included in ADaM, then briefly explain why these data are not needed for ADaM.
- if screen failure/run-in data are not in SDTM either, then state this.

Are data taken from an ongoing study?

If yes or no, state this here.

Do the analysis datasets support all protocol and SAP specified objectives?

If no, include all objectives listed in the protocol and SAP which are not supported in the analysis datasets and the reason for their absence.

Additional content may include, but is not limited to:

- ✓ Location of key safety, efficacy, or other data of special interest.
- ✓ Document the location of adjudication data and the method used to differentiate and to relate this data to data collected at the investigational site.
- ✓ Document any analysis datasets which are included for supportive purposes but not utilized for submitted analyses.

5.2 Analysis Datasets

This section provides an inventory of the analysis datasets. The content below is provided to describe standard practice for how to reference the analysis datasets. This may be done in a table, as shown below, or in textual format. The parameters in the table are those used in the software programs that will be submitted in accordance with the Study Data Technical Conformance Guide¹.

List all analysis datasets included in the submission and are source to the CSR TLFs, starting with ADSL followed by all others in alphabetical order by dataset name.

Include a separate row for each split analysis dataset.

Provide a hyperlink to the sections below from the value in the Dataset-Dataset Label to any analysis dataset that requires additional explanation within the context of the study.

Specify the ADaM class.

Specify the functional category or categories for each analysis dataset.

Include categories of Efficacy, Safety, Baseline or Other Subject Characteristics, and PK/PD (if these data are present).

Additional categories may be defined at the discretion of the sponsor.

Indicate if the analysis dataset is used for the primary analysis.

Optionally, describe the structure of the analysis dataset. If included in the table, the structure should align with define.xml.

Example 1:

| Dataset Dataset Label | Class | Efficacy | Safety | Baseline or other subject characteristics | PK/PD | Primary Objective | Structure |
|---|-------|----------|--------|---|-------|----------------------|--|
| ADSL Subject Level Analysis Dataset | ADSL | | | X | | | One observation per subject |
| ADAE Adverse Event Analysis | ODS | | X | | | | One observation per subject per event |

| | | | | | | | |
|---|-------|---|---|--|---|---|--|
| Dataset | | | | | | | |
| ADEFF Primary Efficacy Analysis Dataset | BDS | X | | | | X | One observation per subject per parameter per visit |
| ADEX Exposure Analysis Dataset | OTHER | | X | | | | One observation per subject per intervention |
| ... | | | | | | | |
| ADPK PK Parameters Analysis Dataset | BDS | | | | X | | One observation per subject per parameter per visit |
| ADTTE Time to Cardiac Events Analysis Dataset | BDS | X | X | | | X | One observation per subject per endpoint |

End of Example

Example 2:

| Dataset Dataset Label | Class | Efficacy | Safety | Baseline or other subject characteristics | PK/PD | Primary Objective | Structure |
|---|-------|----------|--------|---|-------|----------------------|--|
| ADSL Subject Level Analysis Dataset | ADSL | | | X | | | One observation per subject |
| ADAE Adverse Event Analysis Dataset | ODS | | X | | | | One observation per subject per event |
| ADEFF Primary Efficacy Analysis Dataset | BDS | X | | | | X | One observation per subject per parameter per visit |
| ADEX Exposure Analysis Dataset | OTHER | | X | | | | One observation per subject per intervention |

End of Example

5.2.1 ADSL – Subject Level Analysis Dataset

This section is required for the subject level analysis dataset. Provide explanation beyond which is documented in define.xml or the ADaM Implementation Guide and its supplements.

Content may include, but is not limited to the following:

- ✓ Describe breadth of coverage of ADSL.
- ✓ Does ADSL have the same number of subjects (records) as in the SDTM DM domain? If no, then describe any difference.
- ✓ Document which analysis populations are defined in ASDL using their variable name.
- ✓ Description of notable sponsor extensions to CDISC Controlled Terminology.
- ✓ Descriptions of notable mapping of legacy sponsor terminology to CDISC Controlled Terminology.
- ✓ Are there other analysis datasets that contain other subject level information pertaining to baseline characteristics, disposition, etc? If yes, then list the name of the other subject level datasets.
- ✓ List the variable names for the covariates used for inferential statistical analysis relating to the primary or secondary objectives.
- ✓ Are all covariates used for inferential statistical analysis relating to the primary or secondary endpoint included in ADSL? If no, then indicate where the other covariates can be found.
- ✓ Describe any other variables applied to this analysis dataset, in particular those which are not used routinely or require additional information to aid interpretation.
- ✓ Are there screen failure and/or run-in failure data in this dataset? If yes, indicate as such.

5.2.x Dataset – Dataset Label

This section is required for each analysis datasets (AD) with hyperlinks that have been provided in Section 5.2 for analysis datasets that benefit from additional description. At a minimum, the dataset containing the primary objective must be described and hyperlinked to the table in section 5.2. Provide explanation beyond which is documented in define.xml or the ADaM Implementation Guide and its supplements. For the dataset(s) that contain the primary efficacy measures, it is advisable to identify the variables that are used for the analyses of these primary endpoints. This is especially important if a non-BDS structure is used since this implies non-standard variable names that may not be obviously related to efficacy endpoints. When using BDS, it is advisable to indicate the relevant parameter(s), variable(s) analyzed (AVAL, AVALC, CHG, etc), and flags or timing variables as appropriate.

Do not duplicate information that pertains to multiple datasets that may be discussed in Section 3 above. Provide a section number for each AD requiring additional explanation (e.g., 5.2.2, 5.2.3, 5.2.4).

Note that this section header is NOT a Word Header Style. It must be manually edited. This avoids problems with automatic 3-level section numbering that sometimes occurs with Word Header Styles.

Specify key parameters and/or variables of interest. At a minimum, those related to the primary objective should be indicated. Note that it is not necessary to describe the derivation of the primary objective as this would be in the SAP and define.xml. An example is included below for dataset ADEFF. The table is an example and other formats are acceptable.

Content may include, but is not limited to the following:

- ✓ Describe the purpose and breadth of coverage of the AD.
- ✓ Description of notable sponsor extensions to CDISC Controlled Terminology.
- ✓ Descriptions of notable mapping of legacy sponsor terminology to CDISC Controlled Terminology.
- ✓ Are there substantial number of records in this AD that are found in other AD's, for example a 'parent' and 'child' relationship with another AD? If yes, then indicate the name of the other AD's.
- ✓ Document if there are separate analysis datasets that contain similar content and the purpose for separating the data into multiple analysis datasets. For example, suppose you separate different sensitivity analyses for time to event in different datasets or create different ADs for different baselines instead of using BASETYPE.
- ✓ Are the same number of subjects included in this AD as in the source SDTM domain? If no, then describe the reason for the difference. If this difference is due to screen failures, then this should already have been noted in Section 3.1.
- ✓ Are there derived variables in this AD that are also represented in SDTM but the derivation differs? If yes, then itemize variables and/or describe differences that are not easily understood from the define file.
- ✓ If there are multiple treatment variables in the AD, then describe which treatment variables are used for the analyses generated from this AD.
- ✓ Is BASETYPE used in this AD? If yes, then briefly describe why BASETYPE is needed.
- ✓ Is DTYPE used in this AD? If yes, then briefly describe why DTYPE is needed.
- ✓ Were any external reference data or look up tables used for derivations in this AD? If yes, then indicate whether they are included in the submission and the location.
- ✓ Are there specific flag variables (excluding population flags) that are important for the analyses? If yes, then describe.
- ✓ Describe any derived variables which were created to mitigate issues relating to data that was demonstrably incorrect.
- ✓ If special windowing rules were used in this AD, then describe.

- ✓ Describe any other variables applied to this analysis dataset, in particular those which are not used routinely or require additional information to aid interpretation.
- ✓ Are there screen failure and/or run-in failure data in this dataset? If yes, indicate as such.

Example:**5.2.1 ADSL – Subject Level Analysis Dataset**

In addition to supporting all analyses, ADSL contains variables to also support baseline characteristics and disposition analyses. The population indicator variables, treatment variables and variables used as covariates for statistical analyses (Age Group <65, >=65 - AGEGR1 and Country - COUNTRY) are copied onto all analysis datasets. All subjects in DM, with the exception of screen failures, were included in ADSL.

5.2.2 ADEFF – Efficacy Analysis Dataset

ADEFF is a sponsor-defined analysis dataset following the ADaM Basic Data Structure (BDS) supporting the primary efficacy endpoint of ACR 20 and the secondary efficacy endpoint of ACR. Only one type of baseline was defined in the SAP but BASETYPE = "SCREENING" was included to indicate that baseline is defined as screening for the included parameters. For all analyses of these parameters, AVAL is the variable analyzed.

| PARAMCD Value | PARAM Value | Description | Usage |
|---------------|---------------------------|--|--|
| TSJC | Total Swollen Joint Count | Number of swollen joint counts identified by the investigator | Included for traceability for the derivation of the ACR score |
| TTJC | Total Tender Joint Count | Number of swollen joint counts identified by the investigator | Included for traceability for the derivation of the ACR score |
| ACR | ACR | The ACRn score is defined as each patient's lowest percentage improvement from baseline of the contributing parameters. A positive value indicates improvement | Utilized in summary statistics and included for traceability in the derivation of ACR 20 |
| ACR20 | ACR 20 | Binary response as to whether the ACR 20 criteria is met or not | Primary Analysis endpoint analyzed using a CMH test |

End of Example

6. Data Conformance Summary

This section describes the validation checks and inputs used to evaluate conformance.

6.1 Conformance Inputs

This section summarizes how ADaM conformance was established. Answers to the following questions must be provided:

Specify the software name and version for the analysis datasets

(Text here)

Specify the version of the validation rules (i.e. CDISC, FDA) for the analysis datasets

(Text here)

Specify the software name and version for the define.xml

(Text here)

Specify the version of the validation rules (i.e. CDISC, FDA) for the define.xml

(Text here)

Provide any additional compliance evaluation information:

(Text here)

Because ADaM conformance is not solely established by computerized checks, sponsors may use other methods to assess conformance, such as manual review of the data or internal testing of the clarity of variable metadata. If such methods are used and are worthy of noting, then add additional text as desired.

6.2 Issues Summary

This required section summarizes compliance findings.

- ✓ Summarize findings from an ADaM conformance report (e.g., the validation report's Issues Summary tab or similar) in table form.
- ✓ Include additional information regarding conformance to FDA business rules and FDA validator rules if not addressed in the ADaM conformance report.
- ✓ List only those findings that appear in the submission.
- ✓ Do not include skipped validation checks or validation checks for which datasets do not exist.
- ✓ If your conformance diagnostics do not include severity, leave that column blank.
- ✓ If non-automated issues were detected, these should be explained as well.
- ✓ Explanations should be sufficiently detailed and data-specific (not generic or vague).

In addition, address any specific data quality issues that were not fixed (i.e. data issue discovered post-lock and sponsor decided not to unlock the database). Note what the data should be, why it was not fixed, and any impact assessment that was done.

| Dataset(s) | Diagnostic Message | Severity | Count | Explanation |
|------------|--------------------|----------|-------|-------------|
| | | | | |
| | | | | |
| | | | | |
| | | | | |

7. Submission of Programs

This section is required per the Study Data Technical Conformance Guide. It is advisable for sponsors to discuss the submission of programs with the specific FDA Division review team before preparing a submission. Sponsors should be prepared for FDA reviewers to conduct independent quality validation to verify results in submitted clinical studies. The sponsor should try to understand as clearly as possible how their reviewer will use the submitted programs and what type of 'packaging' will best support the review.

For further clarification on what programs to submit, discuss with the appropriate review division. Also, consult the Study Data Technical Conformance Guide.

Please refer to the ADRG Template for standard text. Include the programming software (i.e SAS, R, etc.) and the version. Also include the internal reference date used to create numeric representation of dates. SAS software represents dates as the number of days since a reference date. The reference date, or date zero, used for SAS date values is 1 January 1960.

7.1 ADaM Programs

| Program Name | Output | Macro Used |
|--------------|--------|------------|
| adsl.txt | adsl | attrib |
| | | |

7.2 Analysis Output Programs

| Program Name | Output Number | Title | Input |
|--------------|---------------|--|-------|
| t_predopbo | 7.1.1 | Percent Reduction Over Placebo for – 28-Day Adjusted POS Frequency - ITT | ADSZP |
| | | | |

7.3 Macro Programs

| Program Name | Purpose |
|--------------|---|
| attrib.txt | Automatically set variable attributes based on specifications |
| | |

Some points to consider might include:

- ✓ Which programs should be submitted?
Per the Study Data Technical Conformance Guide: *Sponsors should provide the software programs used to create all ADaM datasets and generate tables and figures associated with primary and secondary efficacy analyses. Furthermore, sponsors should submit software programs used to generate additional information included in Section 14 CLINICAL STUDIES of the Prescribing Information, if applicable.*
- ✓ Do the programs need to be executable?
The FDA has no policy that requires program code to be executable. If there is a question about whether to do any extra work to make programs executable, it is best to discuss with the reviewer.
- ✓ How should programs that include macro code be handled?
Reviewers consider macro code usable. Macro code may nevertheless be difficult for the sponsor to package. If submitting macro code is problematic, the sponsor may discuss with the reviewer whether an alternate approach is acceptable. Some possible alternate approaches might include:
 - 1) Submitting validation programs that do not contain macro code
 - 2) Submitting resolved macro code.
If the results were programmed using SAS, the MFILE/MPRINT options can be used to write the resolved macro code to a separate file. The resolved macro code could be submitted in place of the original program.

Program files that are submitted should have documentation that identifies the inputs and outputs to the program and allows the reviewer to connect the program with the results that it supports. Industry best practice advises that the inputs/outputs be specified in the program header block. If this practice is adhered to it may be worthwhile noting this. Internal comments to explain important sections of logic are highly recommended. It is worthwhile to accompany the programs with a statement about the reasoning for selecting the programs that were submitted. If there are any special methods for preparing the code (such as the alternatives described above), then the relationship between the submitted code and the outputs should be explained.

Example 1:

“All programs for analysis datasets and primary and secondary efficacy results will be submitted. They were all created on a SAS platform using v9.3. The internal reference date used to create dates in ADaM datasets is January 1, 1960.

The submitted programs include a macro that was used to standardize units of study drug dosing, which is referenced in several datasets.

7.1 ADaM Programs

| Program Name | Output | Macro Used |
|--------------|--------|------------|
| adsl.sas | adsl | dsunit.sas |
| adtte.sas | adtte | dtdate.sas |

7.2 Analysis Output Programs

| Program Name | Output Number | Title | Input |
|--------------|----------------|------------------------|-------|
| teff.sas | Table 14.2.1.1 | Time to Event Analysis | ADTTE |
| tsurv.sas | Table 14.2.2.1 | Patient Demographics | ADSL |

7.3 Macro Programs

| Program Name | Purpose |
|--------------|---|
| dsunit.sas | Standardizes units of study drug dosing |
| dtdate.sas | Time to event calculations |

End of Example

Example 2: "All programs for analysis datasets and primary and secondary efficacy results will be submitted. They were all created on a SAS platform using v9.3. The internal reference date used to create dates in ADaM datasets is January 1, 1960.

The name of the creation program is identical to the name of the analysis dataset. For example, ADSL.SAS produces the dataset ADSL. All inputs, such as SDTM domains or other analysis datasets, are specified in the program header. No macros were used in the production of analysis datasets.

The submitted programs also include programs that produce primary efficacy and safety tables. The table below associates the table number with the program that produced it. The second table lists the macros that were used in table production. Note that one macro may be used to produce multiple tables. The header block in each table program clearly specifies this information as well.

7.1 ADaM Programs

| Program Name | Output | Macro Used |
|--------------|--------|------------|
| adsl.sas | adsl | |
| adae.sas | adae | |
| adex.sas | adex | |
| adlb.sas | adlb | |

7.2 Analysis Output Programs

| Program Name | Output Number | Title | Input |
|--------------|----------------|---|-------|
| subjdisp | 14.1.1 | Subject Disposition | ADSL |
| demog | 14.1.2 | Demographics and Baseline Characteristics | ADSL |
| clinimprove | 14.2.2.1 | Incidence of Clinical Success | ADEX |
| clinimprove | 14.2.2.2 | Incidence of Clinical Improvement | ADEX |
| teaesum | 14.3.1.1 | Overall Summary of Treatment Emergent Adverse Events | ADAE |
| teaesum | 14.3.1.3 | Treatment Emergent Adverse Events by Body System and Preferred Term | ADAE |
| labcfb | Table 14.3.4.1 | Change from Baseline for Hematology Laboratory | ADLB |
| labcfb | Table 14.3.4.2 | Change from Baseline for Chemistry Laboratory | ADLB |

7.3 Macro Programs

| Program Name | Purpose |
|--------------|--|
| statdesc.sas | Prepares descriptive statistics from the specified data set and variable |
| statcnt.sas | Prepares count and percent statistics from the specified data set and variable |
| statcnp.sas | Prepares count/percentage and p-value from the specified data set and variable |
| aeout.sas | Counts Adverse Events by body system and preferred term |
| auxlbout.sas | Summarizes change from baseline values of lab and vital signs parameters |

End of Example

8. Appendix

This is an optional section that can be used if needed. If it is not needed, then delete this section entirely.

Legacy Data Conversion Plan & Report Appendix

This appendix provides information about legacy tabulation data that was converted to SDTM and then to ADaM or legacy analysis data that was converted to ADaM. If there was no conversion, delete the appendix pages as they are not required.

Include this appendix when the ADaM data that are included in the submission were not the source data used to derive the tables, figures, and listings of the CSR. Some common variations are when CSR results were derived:

- Directly from data management system extracts and SDTM/ADaM was produced later for the purpose of submission.
- From non-ADaM analysis data whose source was non-SDTM tabulations data.
- From a version of ADaM that is no longer supported by the FDA's Data Standards Catalog and therefore the data was up-versioned to a more current standard that is supported.

Note that in any of these circumstances, the submission of data should include both the original source data *and* the standardized data. The combination of original and standardized data, with the explanations contained in this appendix, will enable the reviewer to understand how the values in the standardized data equate to the results in the CSR.

1. Introduction

This section states the purpose of the Legacy Data Conversion Plan and Report Appendix. The ADRG Template includes standard text.

2. Conversion Data Flow

This section will contain a diagram showing the flow of all study data from collection through analysis. This is a forward view of the data flow. See the Conversion Traceability Data Flows document for examples that are available for incorporation in this section.

Also, when appropriate explain the rationale for the data conversion.

3. Converted Data Summary

This section provides a summary of the legacy data that was converted to ADaM. Content may include, but is not limited to the following:

- Describe any changes in SDTM and/or ADaM Controlled Terminology
- Describe any additional QC done on the data

3.1 Issues Encountered and Resolved

This section describes any issues encountered as a result of the conversion and the resolution of the issues. Generally, this section should list any differences between the original CSR results and the converted ADaM datasets.

Content may include, but is not limited to the following:

- MedDRA – describe any recoding that was required and the result
- WHODrug – describe any recoding that was required and the result
- How original CRF values were mapped through controlled terminology and the differences in table counts (e.g. subject disposition, or race)
- If original analysis data used ADaM concepts incorrectly (i.e. the concept of Periods did not always have a treatment component, so you used APHASE in the ADaMs)
- Any items originally calculated in table programs but now calculated in the ADaM (i.e., treatment emergence, time to event analysis)

4. Traceability Data Flow

This section will contain a diagram showing the traceability of all study data from collection through analysis. This is a forward and backwards view of the data. See the Conversion Traceability Data Flows document for examples that are available for incorporation in this section.

5. Outstanding Issues

This section will describe any other issues not previously documented and that would be helpful to a reviewer. If there are no outstanding issues, do not delete the section. Add verbiage such as 'There are no outstanding issues to be documented.'

Content may include issues related to the CSR or differences between the CSR results and the converted ADaM datasets, but is not limited to the following:

- Changes in variable values in SAEs, deaths, and disposition
- Changes in treatment-emergent adverse events
- Analysis issues found with the original analysis datasets and corrected in ADaM
- Any analysis dataset that could not be converted to use ADaM concepts

Analysis Data Reviewer's Guide Finalization Instructions

This section describes how to format the document for submission after completing the ADRG Template.

1. Create hyperlinks from dataset names in section 5.2 to descriptions in 5.2.x

Select the text in the first column in the table in section 5.2 that needs a hyperlink. Right click the selected text and choose "Hyperlink" from the menu. In the left panel of the Hyperlink window, make sure that "Place in this document" is selected. Then, in the list of document places select the dataset name's header under ADaM Domains (e.g. ADAE – Adverse Events Analysis Dataset) and click **OK**. Ctrl+click the hyperlink to test it.

2. Do not remove unused sections from the document

For consistency, it is best to leave unused sections in the document and indicate 'NA', or 'This section does not apply'. It is acceptable to remove the optional Appendix 8 section.

3. Update the Table of Contents, document header and version date

After all edits have been completed, update the table of contents at the top of the document. Right click on any line in the table and select "Update Field." In the dialog window, select "update entire table," then click **OK**.

Do not edit the document header or footer. The study number in the header references the study number on the title page. When you edit the study number on the title page, the study number in the header is updated automatically. To update the version date on the title page and the PDF creation date in the document footer, **save and close the document**, then **re-open it**. All necessary fields will be updated.

4. Convert the document to PDF format

These instructions are for Microsoft Word 2003 or newer, using either the Adobe Acrobat plug-in or the MS Office PDF creation feature.

4.1 Using the Adobe Acrobat plug-in for Microsoft Office:

Click the **Acrobat tab** in the Word menu at the top of the screen. Select "Create PDF." If a dialog window pops up asking you to save and continue, click **Yes**. In the second dialog window, **navigate to the directory** in which you want to save the PDF, **name the file "adrg.pdf"**, and click **Save**.

4.2 Conversion without Adobe Acrobat plug-in:

Click the **Office button** at the top left of your screen. Select "Save As," then "PDF or XPS". **Navigate to the directory** in which you want to save the PDF, name **the file "adrg.pdf"**, and click **Save**.

4.3 Formatting and verifying the PDF

Open the PDF. If bookmarks are not showing, go to the **View menu** and select "**Navigation Panels**", then "**Bookmarks.**" If lower-level bookmarks are showing, click on the **Bookmarks Options**  icon and select **Collapse Top-Level Bookmarks**.

Go to the **File menu** and select "**Properties.**" Navigate to the **Initial View tab**. In the drop-down menu for **Navigation tab**, select "**Bookmarks Panel and Page.**" In the drop-down menus for both **Page Layout** and **Magnification**, select "**Default.**"

Next navigate to the **Description tab** and delete the information in the **Title, Author, Subject** and **Keywords** boxes. Click **OK** and then **save the file**. While there, verify at the bottom of the dialog window that the **PDF version is 1.7** or lower.

If the version is too high, go to the **Document menu** and select "**Reduce File Size.**" In the drop-down list select "**Acrobat 8.0 and later.**" Click **OK**, then **navigate to the directory** in which you want to save the PDF, **name the file "adrg.pdf"**, and click **Save**.

Go to **File**, and select "**Properties.**" Verify at the bottom of the dialog window that the **PDF version is 1.7** or lower.