

Update on Technical Rejection Criteria for Study Data

Presented to: CDISC-SEND Spring F2F

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FDA Guidance and Data Standards Catalog



- ❖ Per FD&C Act Section 745A(a), drug application sponsors must use the standards defined in the FDA Data Standards Catalog starting 24 months after final guidance for a specific submission type
- **❖** FDA issued "Providing Regulatory Submissions in Electronic Format Standardized Study Data: Guidance for Industry" in December 2014
- **Sponsors must conform to standards in the FDA Data Standards Catalog:**
 - □NDA, BLA, ANDA studies that started after December 17th, 2016
 - ☐ Commercial IND studies started after December 17th, 2017

Study Data Conformance from Previous Analysis



- Study Data was assessed for:
 - NDA, BLA, and ANDA Submissions received from 12/18/2016 to 3/31/2018
 - Commercial IND Submissions received from 12/18/2017 to 3/31/2018
 - No duplicates
- Conformance was checked against the existing two high-level validation rules as described in the Technical Rejection Criteria for Study Data
 - ☐ 1734 TS Dataset & Correct Study Start Date must be present
 - ☐ 1736 DM Dataset, ADSL Dataset and define.xml must be present

Overall Conformance Statistics from Previous Analysis



Error	Description
1734	Trial Summary (TS) dataset must be present for each study in eCTD section 4.2 and 5.3
1736	Demographic dataset (DM) and the define.xml must be submitted in Module 4 for nonclinical data; DM dataset, the subject-level analysis dataset (ADSL) and define.xml must be submitted in Module 5 for clinical data

	NDA	ANDA	BLA	Comm. IND	All
Total Number of Submissions with Study Data	1,126	1,446	473	176	3,221
Total Number Submissions with Critical Errors	302	551	138	41	1,032
Error 1734	290	506	137	35	968
Error 1736	14	63	1	6	84
Failure Rate (% among submissions with Study Data)	26.8%	38.1%	29.2%	23.3%	32.0%

Notes:

- (1) One drug application could contain multiple submissions throughout its review life-cycle, such as original, supplements, and amendments
- (2) Analysis includes NDA, BLA, and ANDA submissions received by CDER between 12/18/2016 and 3/31/2018, and commercial IND submissions received by CDER between 12/18/2017 and 3/31/2018
- (3) Validation of error 1736 of a study is not performed if a study has Error 1734
- (4) A submission with multiple studies can report both Errors 1734 and 1736. In this instance, the submission is counted only once at the submission level when calculating failure rate





Error	Description
1734	Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections*
1736	For SEND data, a DM dataset and define xml must be submitted in required sections* For SDTM data, a DM dataset and define.xml must be submitted in required sections* For ADaM data, an ADSL dataset and define.xml must be submitted in required sections*

* Refer to the latest Technical Rejection Criteria for Study Data	NDA	ANDA	BLA	Comm. IND	All
Total Number of Submissions with Study Data	877	1078	291	649	2895
Total Number Submissions with Critical Errors	195	266	50	113	624
Error 1734	185	186	48	96	515
Error 1736	16	88	2	18	124
Failure Rate (% among submissions with Study Data)	22.2%	24.7%	17.2%	17.4%	21.6%

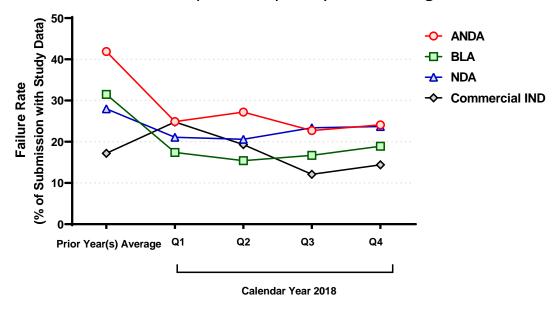
Notes:

- (1) Analysis includes NDA, BLA, ANDA and Commercial IND submissions received by CDER between 1/1/2018 and 12/31/2018
- (2) Validation of error 1736 is not performed if a study has Error 1734
- (3) A submission with multiple studies can report both Errors 1734 and 1736. In this instance, the submission is counted only once at the submission level when calculating failure rate
- (4) Analysis is conducted according to the revised TRC (Revised Jan. 2019)

Overall Conformance Trend for Validation Errors 1734 & 1736



Submissions with study data received during CY2018 showed overall decreases in failure rate of Validation Errors 1734 and 1736 compared to prior years' average failure rate



Notes:

- (1) Prior year(s) average uses data from the previous analysis, but excludes any submissions received in 2018
- (2) CY2018 analysis is conducted according to the revised TRC (Revised Jan. 2019)

Summary of 1734 and 1736 Conformance Trend



- The failure rate for Errors 1734 and 1736 for all application types received in CY2018 is 21.6%
- Overall conformance for Errors 1734 and 1736 improved compared to the previous analysis (previous years' average of 68.0% vs. CY2018's average of 78.4%)
- FDA has identified the need to provide additional clarifications on TRC to help Industry meet study data requirements and continue to improve the conformance trend over time

Revision to TRC

- ❖ Details on 1734 and 1736
- ❖ Emphasis on Error 1735
- ❖ Inclusion of Error 1789
- ❖ Inclusion of **Table 1** eCTD Technical Rejection Criteria for Study Data Expectation
- Inclusion of Appendix 1 Examples of Validation Findings in Study Data
- ❖ Inclusion of **Appendix 2** Examples of ts.xpt datasets
- **Additional Tools**: Self-Check Worksheet and Instructions for Study Data

Summary of Latest Revisions to the Technical Rejection Criteria for Study Data (Revised Jan. 2019)



Error	Description (Reference to FDA Study Data Technical Rejection Criteria May 2018 version)	Severity Level
1734	Trial Summary (TS) dataset must be present for each study in eCTD section 4.2 and 5.3	High
1736	Demographic dataset (DM) and the define.xml must be submitted in Module 4 for nonclinical data; DM dataset, the subject-level analysis dataset (ADSL) and define.xml must be submitted in Module 5 for clinical data	High
Error	Description (Reference to FDA Study Data Technical Rejection Criteria Jan. 2019 version)	Severity Level
1734	Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections*	High
<mark>1735</mark>	Correct STF file-tags must be used for all standardized datasets and corresponding define.xml files in required sections*	High
1736	For SEND data, a DM dataset and define xml must be submitted in required sections* For SDTM data, a DM dataset and define.xml must be submitted in required sections* For ADaM data, an ADSL dataset and define.xml must be submitted in required sections*	High
<mark>1789**</mark>	STF Files must be submitted in a study section. STF s are not required for required sections*	High

^{*} Refer to the latest Technical Rejection Criteria for Study Data

^{**} From Providing Regulatory Submissions in Electronic Format – Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specification, Section J: Datasets must only be provided in modules 3, 4, or 5 and not in modules 1 or 2

Emphasis on Errors 1735 and Inclusion of 1789



- Each submission typically contains many studies, an STF file is necessary to process study files into their corresponding studies; Accepting a submission where CDER cannot process the study tagging file will result in the reviewer seeing a list of files for which they do no not know the study they belong to
- If a study data file (e.g. define.xml) is not properly tagged in the STF file, it cannot be identified and located, resulting in Error 1736 being reported

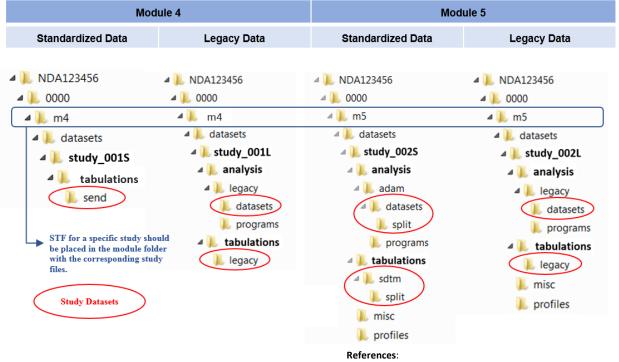
Error	Description	Severity Level
1789	STF Files must be submitted in a study section. STF s are not required for required sections*	High
1735	Correct STF file-tags must be used for all standardized datasets and corresponding define.xml files in required sections*	High

^{*} Refer to the latest Technical Rejection Criteria for Study Data





❖ STF files and their associated datasets should be organized into a specific file directory structure and a specific headings and hierarchy structure



Additional Details for Error 1734



❖ Full ts.xpt

Sponsors should submit a dataset named 'ts.xpt' following published CDISC Standard and FDA Study Data Technical Conformance Guide

Simplified ts.xpt

Sponsors should submit a dataset named 'ts.xpt' with four variables: STUDYID, TSPARMCD, TSVAL, AND TSVALNF)

Example of ts.xpt Datasets

STUDYID	TSPARMCD	TSVAL	TSVALNF
•Study ID in STF File	•SSTDTC for a clinical study •STSTDTC for a nonclinical study	Format: yyyy-mm-ddLeft blank when study start date is not available	 Left blank when study start date is provided in TSVAL Exception code as specified in the ISO 21090 Standard when study start date is not available

Additional Details for Error 1734



❖ STUDYID in STF.xml and ts.xpt should match

Based on the FDA Study Data TCG and the ICH STF Specification the Study ID uniquely and unambiguously identifies a particular study

ICH M2 EWG: The eCTD Backbone File Specification for Study Tagging Files

II. STUDY-IDENTIFIER ELEMENT

Information describing the study is contained in the study-identifier element of the STF. There are three elements contained in the study-identifier element: title, study-id, and category.

A. Title Element

The title element provides the full title of the study, not the title of each individual document.

B. study-id Element

The study-id is the internal alphanumeric code used by the sponsor to unambiguously identify this study.

CDISC Submission Metadata Model

The following variables are considered core selection variables for use in all CDISC domain models. These variable roles may also be defined with other roles (such as Key), and roles may differ from dataset to dataset.

Variable Name	Variable Label	Comments	Included in:		
STUDYID	Study ID	Uniquely identifies a study within a particular submission.	All files		
SITEID	Site ID	Some sponsors may use INVID	At least one of these		
INVID	Investigator ID	instead of or in addition to a SITEID.	variables must be included in all files		
USUBJID	Unique Subject ID	Must be unique subject identifier within a submission (previously defined as PID: should be consistent with PID references used elsewhere in the submission)	All files		

References:

FDA Study Data Technical Conformance Guide (Version 4.2, October 2018)
FDA Study Data Technical Rejection Criteria (Revised Jan. 2019)
ICH M2 EWG: The eCTD Backbone File Specification for Study Tagging Files (June 2008)
CDISC Submission Metadata Model (Version 2.0, 26 November 2001)



FDA

Study Start				Expectation	by Center
Date	Application Type	Data Type	Study Sections	CDER	CBER
Prior to or on 17-Dec-2017	Nonclinical Commercial INDs			Rejection criteria will be applied; submit a simplified TS whether or not the study contains an xpt dataset (other than the ts.xpt)	Rejection criteria will not be applied
		Clinical	5.3.1.1, 5.3.1.2, 5.3.3.1z, 5.3.3.2, 5.3.3.3, 5.3.3.4, 5.3.4, 5.3.5.1, 5.3.5.2	Rejection criteria wi	ill not be applied
After	Commercial INDs	Nonclinical	4.2.3.1, 4.2.3.2, 4.2.3.4	Rejection criteria will be applied; submit a full TS	Rejection criteria will not be applied
17-Dec-2017	Commercial INDS	Clinical	5.3.1.1, 5.3.1.2, 5.3.3.1, 5.3.3.2, 5.3.3.3, 5.3.3.4, 5.3.4, 5.3.5.1, 5.3.5.2	ill not be applied	
Prior to or on 17-Dec-2016	NDA, BLA, ANDA	Nonclinical		Rejection criteria will be applied; submit a simplified TS whether or not the study contains an xpt dataset (other than the ts.xpt)	Rejection criteria will not be applied
		Clinical	5.3.1.1, 5.3.1.2, 5.3.3.1, 5.3.3.2, 5.3.3.3, 5.3.3.4, 5.3.4, 5.3.5.1, 5.3.5.2	Rejection criteria will be applied study contains an xpt datase	•
After	NDA, BLA, ANDA	Nonclinical	4.2.3.1, 4.2.3.2, 4.2.3.4	Rejection criteria will be applied; submit a full TS	Rejection criteria will not be applied
17-Dec-2016		Clinical 5.3.1.1, 5.3.1.2, 5.3.3.1, 5.3.3.2, 5.3.3.3, 5.3.3.4, 5.3.4, 5.3.5.1, 5.3.5		Rejection criteria will be a	pplied; submit a full TS
_				Reference: FDA Study Data Technica	al Rejection Criteria (Revised Jan. 2019)

CY2018 Conformance Analysis of NDA Submission Studies: Errors 1734, 1735 & 1736



Error	Description
1734	Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections*
1735	Correct STF file-tags must be used for all standardized datasets and corresponding define.xml files in required sections*
1736	For SEND data, a DM dataset and define xml must be submitted in required sections* For SDTM data, a DM dataset and define.xml must be submitted in required sections* For ADaM data, an ADSL dataset and define.xml must be submitted in required sections*

* Refer to the latest Technical Rejection Criteria for Study Data

		Submissio	n Type		9	Study Type		
	Original	Efficacy	Rolling	Other	Nonclinical (m4)	Clinical (m5)	Other	Total
Total Number of Studies	1201	194	128	904	403	1810	214	2427
Total Number Studies with Critical Errors	172	42	14	201	38	390	0	354
Error 1734	122	37	10	185	33	321	0	354
Error 1735	42	5	1	11	6	53	0	59
Error 1736	23	0	4	9	1	35	0	36
Error Rate (% among Total Number of Studies)	14.3%	21.7%	10.9%	22.2%	9.7%	21.6%	0	17.7%

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CY2018 Conformance Analysis of IND Submission Studies: Errors 1734, 1735 & 1736



Error	Description
1734	Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections*
1735	Correct STF file-tags must be used for all standardized datasets and corresponding define.xml files in required sections*
1736	For SEND data, a DM dataset and define xml must be submitted in required sections* For SDTM data, a DM dataset and define.xml must be submitted in required sections* For ADaM data, an ADSL dataset and define.xml must be submitted in required sections*

	Submission Type			
	Original	Other		
Total Number of Studies	718	631		
Total Number Studies with Critical Errors	77	126		
Error 1734	44	106		
Error 1735	27	11		
Error 1736	9	15		
Error Rate (% among Total Number of Studies)	10.7%	20.0%		

* Refer to the latest Technical Rejection Criteria for Study Data

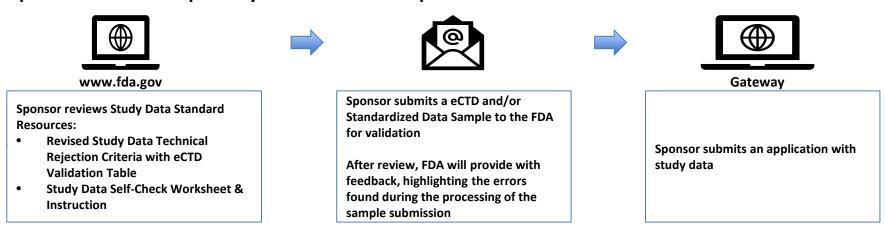
Study Type				
Nonclinical (m4)	Clinical (m5)	Other		
883	288	178		
105	98	0		
65	85	0		
36	2	0		
11	13	0		
11.9%	34.0%	0%		

Total
1,349
203
150
38
24
15.0%

Tools for Industry



FDA has developed tools to help sponsors meet updated study data standard requirements and provide more transparency on the validation process



1. Revised Study Data Technical Rejection Criteria (Revised Jan. 2019)

Purpose: To clarify the requirements for eCTD Validation of submissions with study data and to provided examples (**Appendix 1 and 2**) to illustrate the requirements

2. TRC Self-Check Worksheet & Instruction

Purpose: To help sponsors understand criteria for submissions with study data to pass the updated TRC

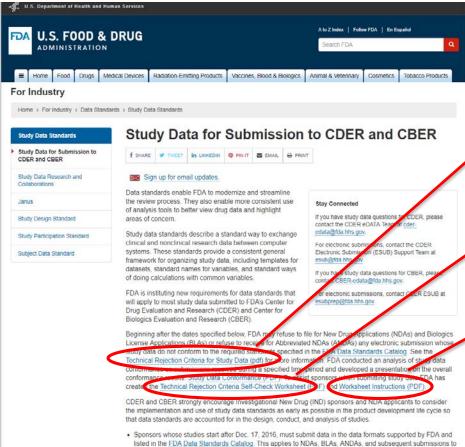
3. eCTD and/or Standardized Data Sample Validation

Purpose: To help sponsors validate their sample submissions and receive feedback with identified errors

Published Technical Rejection Criteria for Study Data

& Self-Check Worksheet





Study Data for Submission to CDER and CBER

https://www.fda.gov/ForIndustry/DataStandards/StudyDataStandards/ucm587508.htm

"Technical Rejection Criteria for Study Data"

https://www.fda.gov/downloads/forindustry/datastandards/studydatastandards/ucm630740.pdf"

"Technical Rejection Criteria Self-Check Worksheet" https://www.fda.gov/downloads/ForIndustry/DataStandards/StudyDataStandards/UCM630732.pdf

"Technical Rejection Criteria Self-Check Worksheet Instructions"

https://www.fda.gov/downloads/ForIndustry/DataStandards/StudyDataStandards/UCM630733.pdf



FDA

- Designed to walk sponsors through each step of TRC validation process
- Dynamically guides sponsors through study data requirements based on study information entered
- Designed to help the sponsors when they prepare study data to submit to the FDA for the first time

Reference: "Technical Rejection Criteria Self-Check Worksheet" https://www.fda.gov/downloads/ForIndustry/DataStandards/StudyDataStandards/UCM630732.pdf

"Technical Rejection Criteria Self-Check Worksheet Instructions" https://www.fda.gov/downloads/ForIndustry/DataStandards/StudyDataStandards/UCM630733.pdf

	Self-Check Worksheet for Study Data Preparation				
	Note: This Self-Check Worksheet is designed for newly submitted Study Data. *Required field				
ion &	1a. FDA Center*:	CDER	CBER		
Section 1: Application & Submission Information	1b. Application Type*:	NDA	BLA	ANDA [Commercial IND
n 1: A	1c. Application Number:		1d. eCTD Sec	quence Number	
Sectio	1e. eCTD Submission Type:		1f. eCTD Sub	mission Sub Ty	pe:
	:: Repeat Sections 2 through	5 for each study.			
	2a. Study ID*:				
_	Study ID is the unique identifier across application documents. Therefore, the study ID must be consistent across all the files being submitted for the same study, i.e. STF File, ts.xpt, dm.xpt, etc. 2b. Is This the First Time Study Data is Being Submitted Yes No for This Study as Part of This Application?*				
Section 2: Study Information					
dy Info	If you answered "No" in Field 2b, do not proceed. This self-check worksheet is designed for newly submitted study data.				
2: Stuc	2c. Name of the Study:				
tion	2d. Study Section - eCTD Heading (Example: m4-2-1-1):				
š	2e. Module*:	Nonclinical (m4)	Clinical (m5)		
	2f. Study Dataset Type(s)*:	Tabulation	Analysis	s 🗌	
	3a. Are Files Included in a Study Applicable to Sections 4.3, 5.2,		Yes No		
Ę.	If you answered "No" in Field 3a, and no files are included in a study section, excluding sections 4.3, 5.2, 5.3.6, and 5.4, then				
3: STF File Information	3b. Is STF File Included?*		Yes No		Referenced Validation Error
File	3c. Does STF File Reference all A	ssociated Study Files?*	Yes No		Number 1789
n 3:STF	If you answered "No" in Fields 3	b or 3c, Validation Rule 17	789 FAILS. Do n	not proceed.	
tion	3d. Study ID in STF File*:				





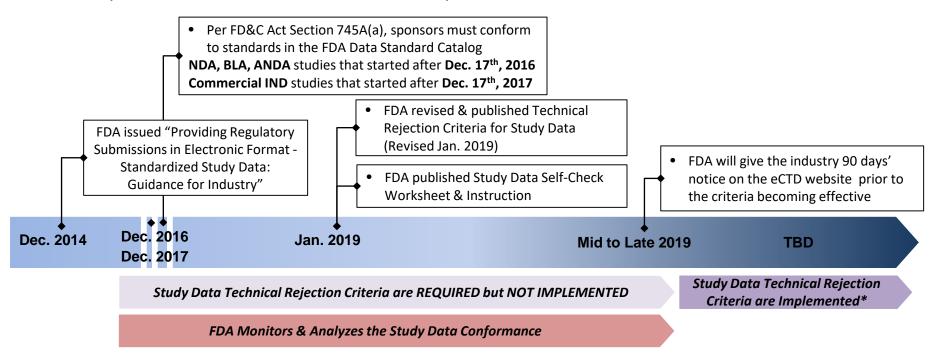
Section	Contents	Example(s)
1	 Application & Submission Information Provides high level information about the application and submission 	1a. FDA Center*: CDER CBER
2	 Study Information Provides more detailed information about the specific study 	2a. Study ID*: 2f. Study Dataset Type(s)*: Tabulation Analysis
3	STF File Information (1789 Validation Error)Provide information about STF file	3b. Is STF File Included?* Yes No Yes No Yes No Yes No Yes No No The No Yes No The No Yes No The No
4	 TS File Information (1734 Validation Error) Provide information about ts.xpt file with study start date 	4c. Study ID in TS File*: 4d. Does Study ID in STF & TS Files Match?* Yes No
5	 Standardized Dataset Information (1735 & 1736 Validation Error) Provide information about SEND or STDM and/or ADaM dataset and define.xml Provide information about STF File-tags 	5f. Is DM File Included?* Sg. Is Define File - Included?* Sh. Are the STF File-Tags for the SDTM Datasets "datatabulation-dataset-sdtm"?* Si. Is the STF File-Tag for the Define File "datatabulation-data-definition?*

Note: Sections 2 through 5 are repeated for each study.

Implementation Timeline



FDA published Revised Study Data Technical Rejection Criteria (Revised Jan. 2019) and Study Data Self-Check Worksheet to assist sponsors with the TRC Conformance



^{*} Note: When a submission is technically-rejected, the submission sequence is not transferred into the FDA electronic document rooms www.fda.gov

Summary



- Based on the revised TRC, about 21.6% all submissions were received with non-critical errors for 1734 and 1736
- FDA published Study Data Self-Check Worksheet to help sponsors to follow the revised TRC
- FDA requires the submission of standardized Study Data as defined in the FDA Data Standard Catalog
- FDA has not rejected any submission that contains errors as reflected in this analysis
- ❖ FDA plans to use technical rejection criteria to identify applications that are not fulfilling this requirement



To avoid validation errors, it is important for sponsors and applicants to understand the requirements specified in guidance and recommendations for submitting study data in the Study Data Technical Conformance Guide.

Questions



For questions about submitting study data please contact:

CDER – edata@fda.hhs.gov

CBER - cber.cdisc@fda.hhs.gov

❖ For questions about eCTD, including stf.xml and file-tags, please contact:

CDER - esub@fda.hhs.gov

CBER – esubprep@fda.hhs.gov



References



- "Providing Regulatory Submissions In Electronic Format Standardized Study Data: Guidance For Industry"
 HTTPS://WWW.FDA.GOV/DOWNLOADS/DRUGS/GUIDANCECOMPLIANCEREGULATORYINFORMATION/GUIDANCES/UCM292334.PDF
- "Providing Regulatory Submissions In Electronic Format Submissions Under Section 745a(a) Of The FD&C Act: Guidance For Industry" HTTPS://WWW.FDA.GOV/DOWNLOADS/DRUGS/GUIDANCECOMPLIANCEREGULATORYINFORMATION/GUIDANCES/UCM384686.PDF
- "Technical Rejection Criteria For Study Data"
 HTTPS://WWW.FDA.GOV/DOWNLOADS/FORINDUSTRY/DATASTANDARDS/STUDYDATASTANDARDS/UCM630740.PDF
- "FDA Data Standards Catalog"
 HTTPS://WWW.FDA.GOV/FORINDUSTRY/DATASTANDARDS/STUDYDATASTANDARDS/DEFAULT.HTM
- "Technical Rejection Criteria Self-Check Worksheet"
 HTTPS://WWW.FDA.GOV/DOWNLOADS/FORINDUSTRY/DATASTANDARDS/STUDYDATASTANDARDS/UCM630732.PDF
 "Technical Rejection Criteria Self-Check Worksheet Instructions"
 HTTPS://WWW.FDA.GOV/DOWNLOADS/FORINDUSTRY/DATASTANDARDS/STUDYDATASTANDARDS/UCM630733.PDF
- ❖ For FDA instruction of Study Data submission, see the FDA "Study Data for Submission to CDER and CBER" page at: HTTPS://WWW.FDA.GOV/DRUGS/DEVELOPMENTAPPROVALPROCESS/FORMSSUBMISSIONREQUIREMENTS/ELECTRONICSUBMISSIONS/UCM2 48635.HTM
- For the full list of Study Data standards, see the FDA "Study Data Standards Resources" page at: HTTP://WWW.FDA.GOV/FORINDUSTRY/DATASTANDARDS/STUDYDATASTANDARDS

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