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U.S. FOOD & DRUG ADMINISTRATION

Managing Electronic DMF Submissions

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CDER | US FDA

March 3, 2021

AGENDA

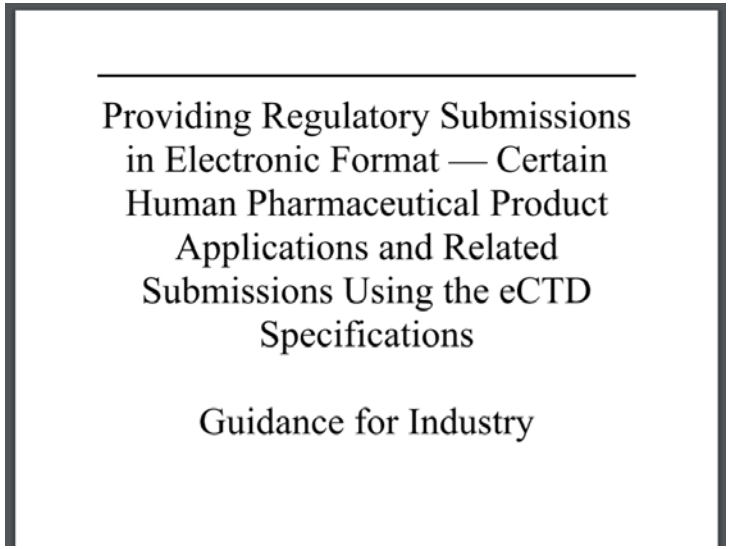
- Electronic Submission Requirements
- ECTD Guidance
- Metrics
- Best Practice
- FAQs
- Support

ELECTRONIC SUBMISSION REQUIREMENTS

Industry must follow FDA guidance when submitting a DMF:

Providing Regulatory Submissions in Electronic Format – Certain Human Pharmaceutical Product Applications and Related Submissions Using eCTD Specifications – Guidance for Industry

https://www.fda.gov/media/135373/download

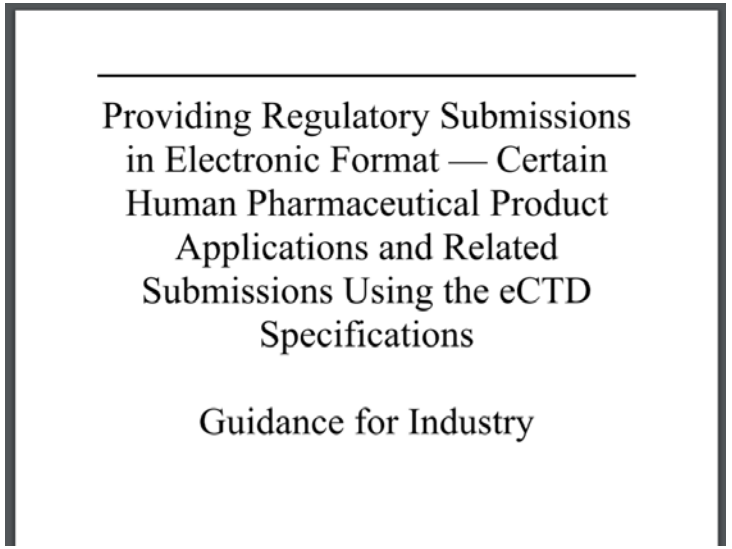


ELECTRONIC SUBMISSION REQUIREMENTS

Two key requirements stated in the guidance:

1. Submissions to a DMF **must** be in ECTD format
2. Submissions sized 10 GB or less **must** be submitted through the FDA Electronic Submission Gateway (ESG)

If the above requirements are not followed, the submission will be rejected.



Note: Type III Master Files are exempt from eCTD requirement

GUIDANCE - ECTD

- See the following resources for more information:
  - *eCTD Guidance (Revision 7)*
  - *eCTD Technical Conformance Guide*
  - *eCTD Submission Standards*
  - *eCTD Website*

- Have Questions? Contact eSub@fda.hhs.gov

GUIDANCE – ECTD – WHAT'S NEW IN REV 7?

- Section III.C. Types of Submissions That Are Exempted From the eCTD Requirement Described in This Guidance
  - Updated section to include exemption for Type III drug master files

- Section III.D. Types of Submissions That May Qualify for a Long-Term Waiver From the eCTD Requirement Described in This Guidance
  - Added section to include waiver criteria for certain PET drug INDs, NDAs, ANDAs, and BLAs, and waiver criteria for certain Type II DMFs

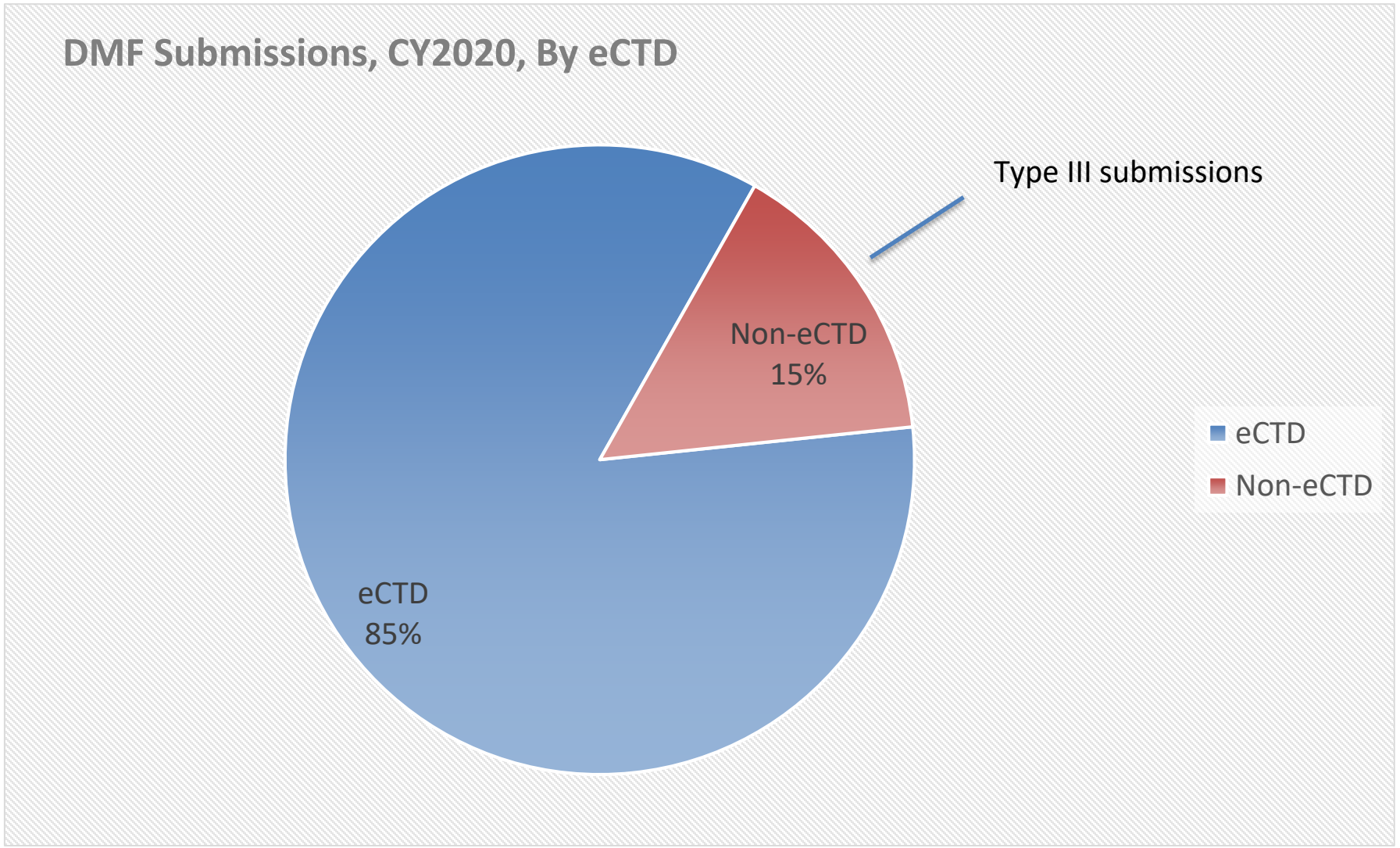
- Section III.E. Types of Submissions That May Qualify for a Short-Term Waiver From the eCTD Requirement Described in This Guidance
  - Added section to include the criteria to qualify for a waiver and the instructions on how to submit a request for a short-term waiver

GUIDANCE – IMPORTANT NOTICE ABOUT ECTD MODULE 1

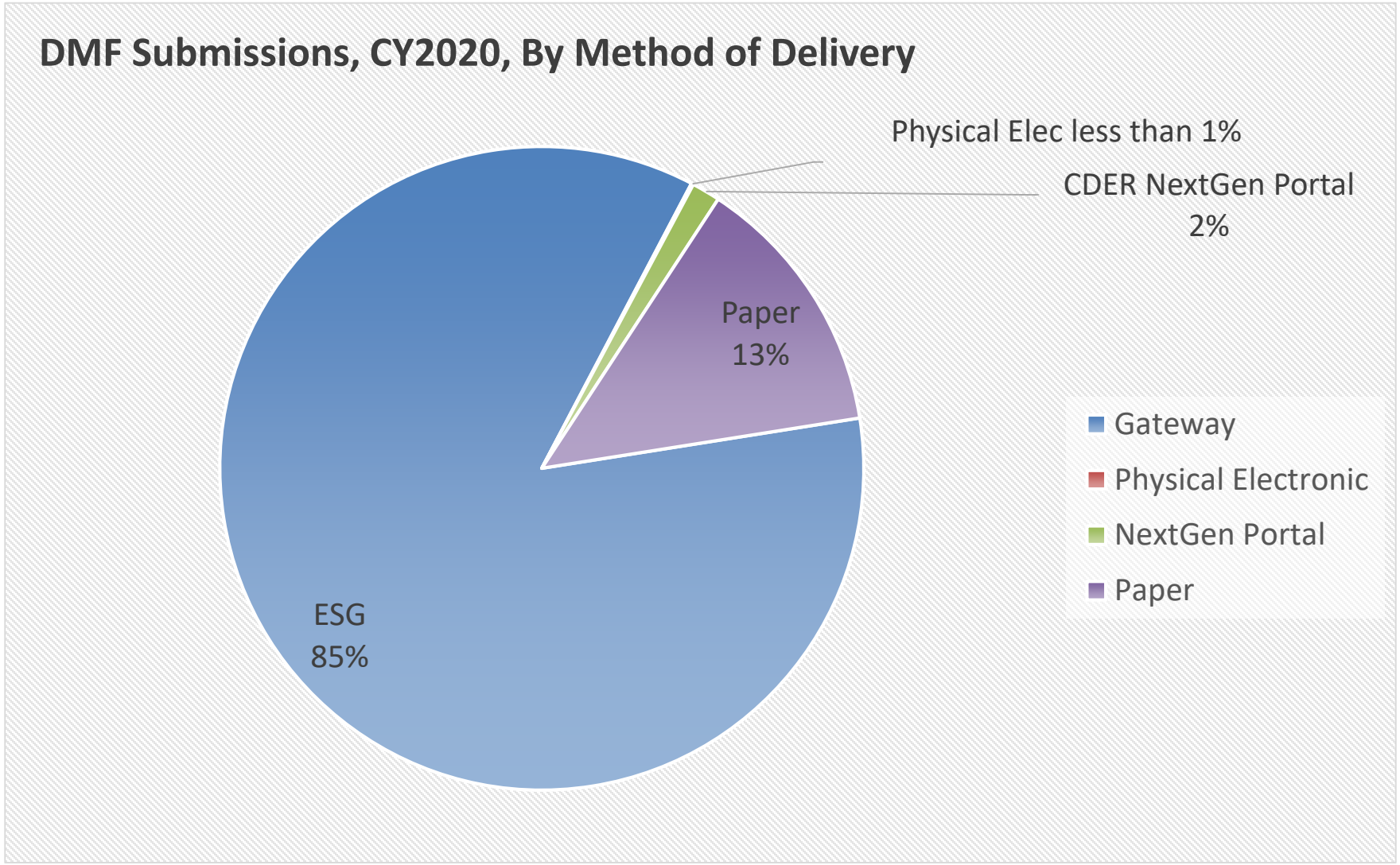
- Starting March 1, 2022, the older version of M1, utilizing DTD 2.01, will no longer be supported. The current version of M1, utilizing DTD 3.3, will be required to pass validation.

- For more information, please see Federal Register Notice located here: https://www.regulations.gov/document?D=FDA-2018-D-1216-0017

DMF SUBMISSION METRICS



DMF SUBMISSION METRICS



BEST PRACTICE

- Request a CDER DMF application number via CDER NextGen Portal
- Organize the DMF submission to follow the ICH Common Technical Document (CTD) structure
  - The following documents will be helpful in organizing the DMF submissions
    - ECTD Technical Conformance Guide
    - Comprehensive Table of Contents Headings and Hierarchy (CTOC)
    - M4 Organization of the Common Technical Document for the Registration of Pharmaceuticals for Human Use Guidance for Industry
    - M4: The CTD -- Quality Questions and Answers /Location Issues
- Use the DMF web page to find information on submission resources: https://www.fda.gov/dmf

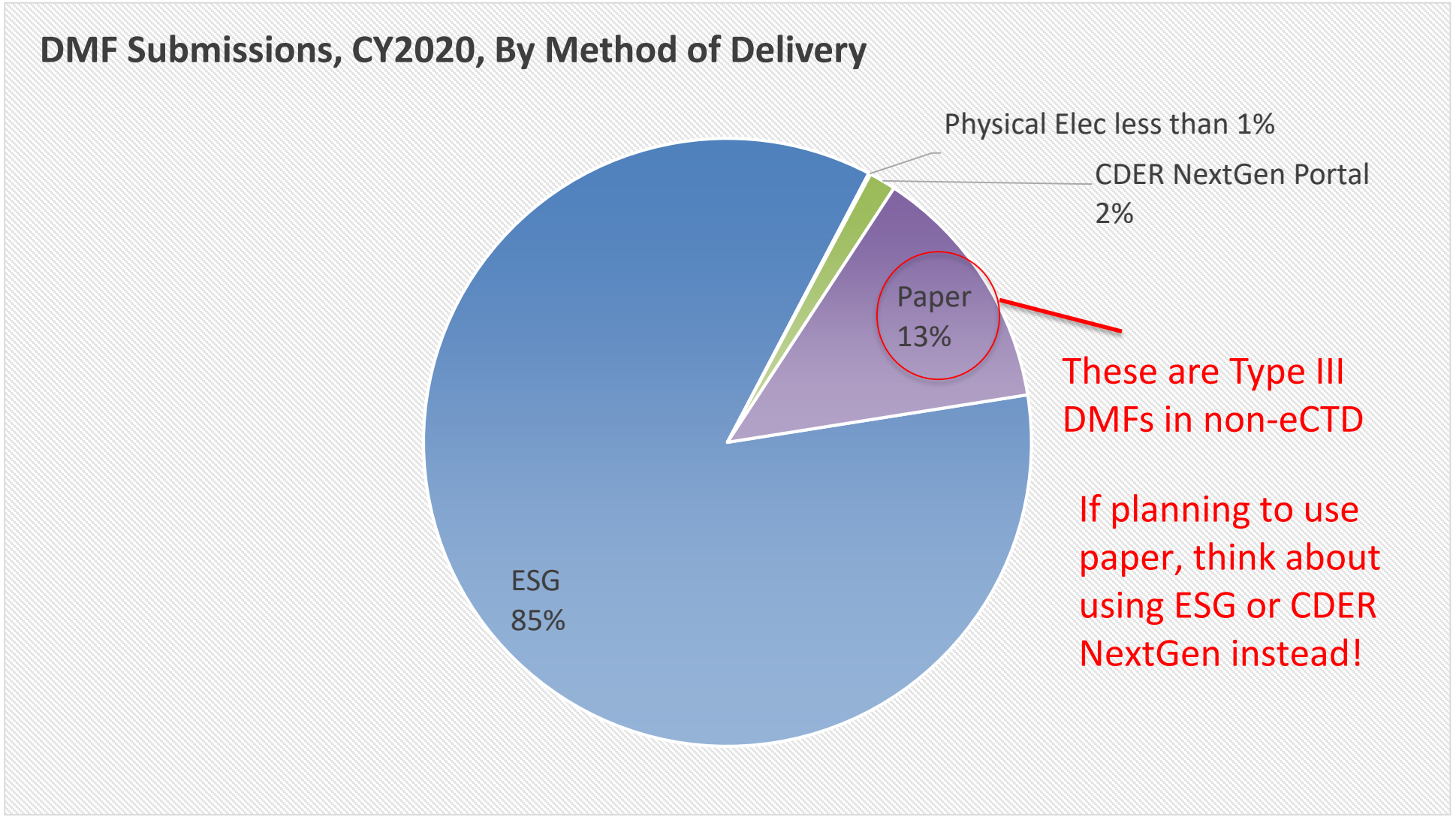
eCTD Tips on managing your DMF lifecycle

- Start with eCTD sequence 0001
- When updating a document submitted in a prior sequence, use the eCTD ***replace*** lifecycle operator
- To remove a document provided under a previous sequence, use the eCTD ***delete*** lifecycle operator
- When submitting a LOA, use the eCTD submission type/subtype of ***amendment***

Transmitting your DMF submission to CDER

- Submit the DMF in ECTD format via ESG (FDA Electronic Submission Gateway)
  - This is a requirement for Type II, IV, and V DMFs
  - Type III can be submitted in ECTD or Non-ECTD
  - If a Type III DMF is not in ECTD format, it can still be submitted online via ESG or CDER NextGen Portal

BEST PRACTICE



FREQUENTLY ASKED QUESTIONS

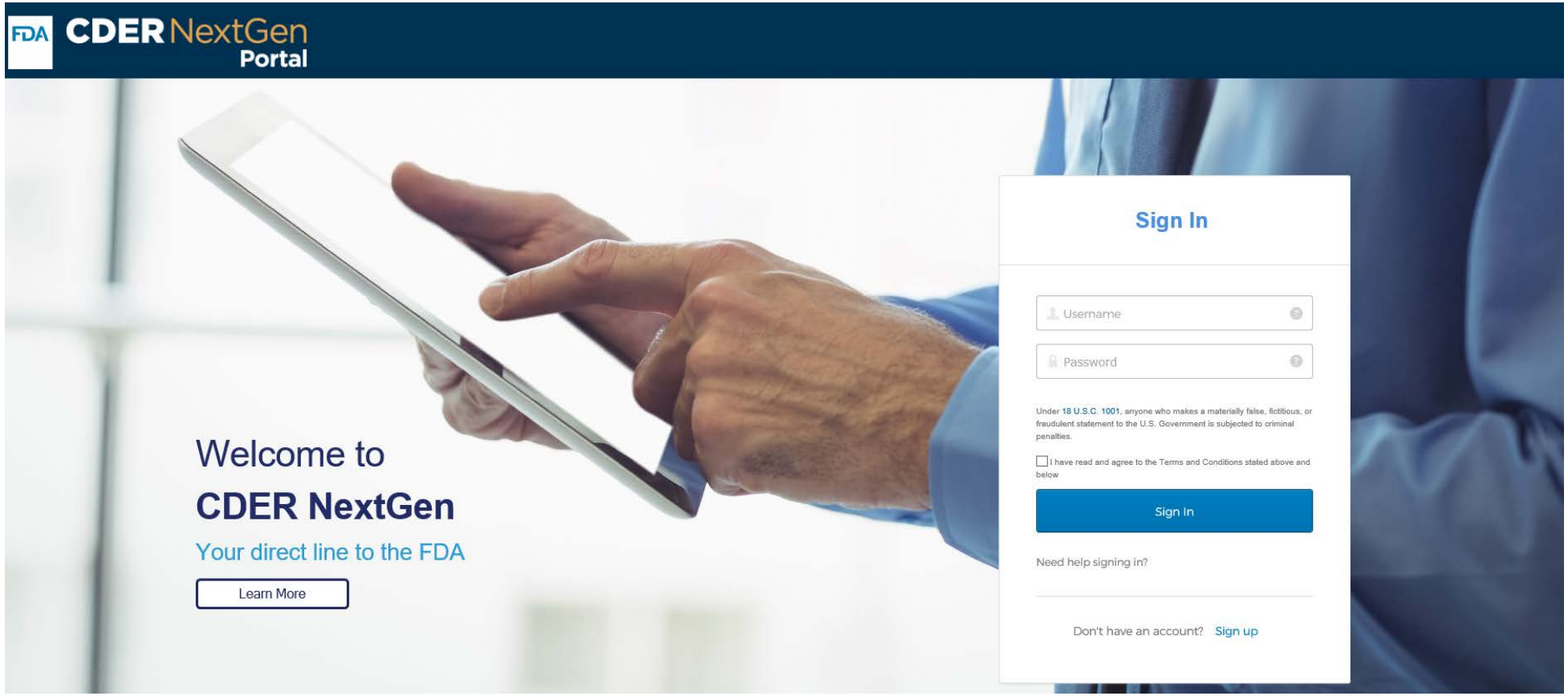
- Can a DMF submitted to CDER be referenced by a CBER application?
  - No, CDER and CBER are different FDA Centers. A DMF should be submitted to the same Center as the application which references it
- Can a DMF receive a waiver from the ECTD requirement if it is only used by a PET drug or non-commercial IND?
  - Possibly. Please see the eCTD Guidance, *Providing Regulatory Submissions in Electronic Format — Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specifications*, for specific waiver criteria

FREQUENTLY ASKED QUESTIONS

- How can I see the activity status for my DMF?
  - This information is published quarterly on FDA's DMF Website, https://www.fda.gov/dmf
- Does FDA have a DMF Form, like the 356h for ANDA, NDA, BLA and 1571 for IND?
  - FDA is currently working to publish a DMF Form this year
- Is it okay to create multiple Drug Product or Drug Substance sections?
  - See FDA guidance for different scenarios and FDA's thinking on how to best present the information
    - M4 Organization of the Common Technical Document for the Registration of Pharmaceuticals for Human Use Guidance for Industry
    - M4: The CTD -- Quality Questions and Answers /Location Issues

WHAT IS CDER NextGen PORTAL

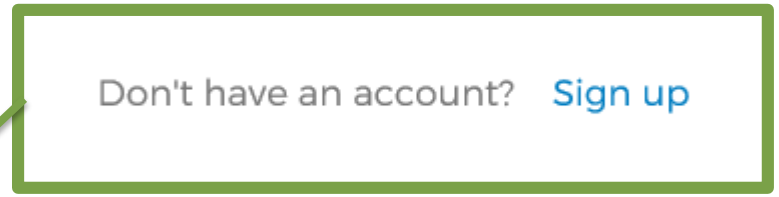
The CDER NextGen **Portal** is a **cloud-based** system that has enabled a transformation in the way CDER and industry work together.



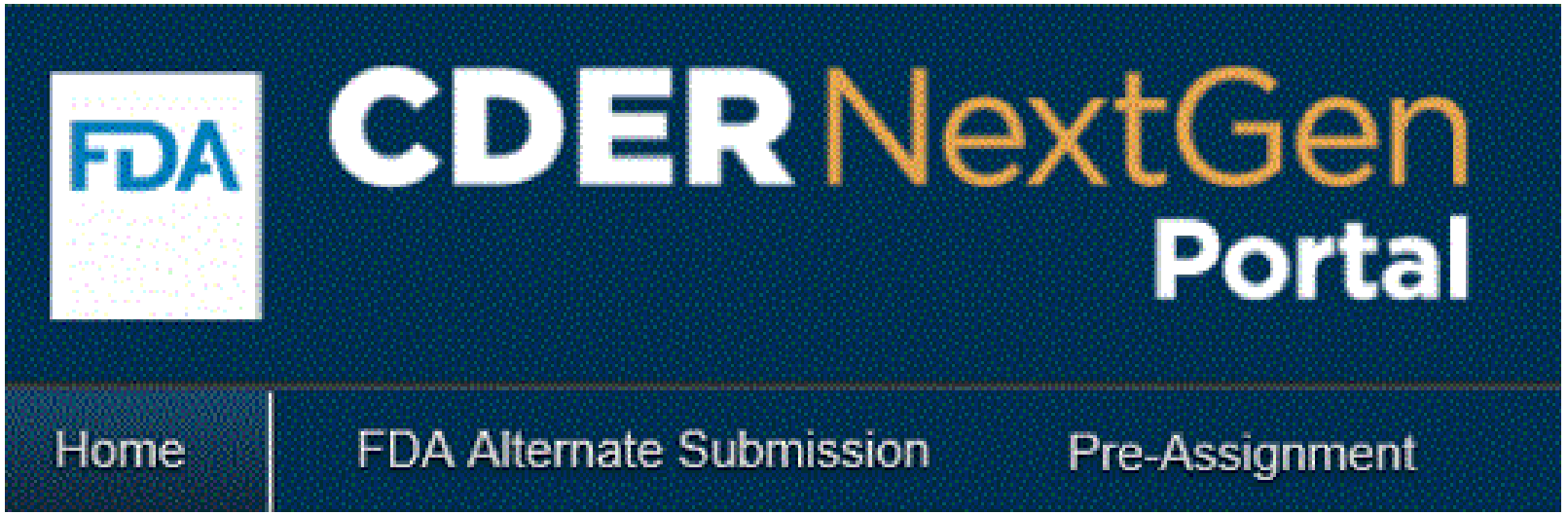
How to Create a CDER NextGen Portal Account

New Users

To register for an account with the CDER NextGen Portal, navigate to https://edm.fda.gov and follow the signup instructions



Using CDER NextGen Portal



Need Help?
edmsupport@fda.hhs.gov

Once registered, click on:

"**FDA Alternate Submissions**" to see options for submitting a Type III DMF in non-eCTD

"**Pre-Assignment**" to request a DMF application number

SUPPORT

- **ESUB Team**: esub@fda.hhs.gov
  – eCTD or general electronic submission questions
- **CDER NextGen Team**: edmsupport@fda.hhs.gov
  – How to register or submit using the portal
- **DMF Question Team**: dmfquestion@fda.hhs.gov
  – DMF content specific questions
- **ESG Team:** esghelpdesk@fda.hhs.gov
  – ESG/WebTrader questions
- **Websites**
  – eCTD : www.fda.gov/ectd
  – DMF: www.fda.gov/dmf
  – ESG: www.fda.gov/esg

SUMMARY

- Guidance
  - eCTD Binding Guidance updated in 2020: Type III exempt from requirement, Waiver Criteria
  - Old Version of eCTD M1 will lose support in March, 2022

- Submission Metrics
  - Almost 100% Type II, IV, V were submitted in eCTD Format
  - 13% of DMF submissions arrive in paper in CY2020. These were Type III which could have been submitted electronically via ESG or CDER NextGen Portal

- Best Practices
  - Use eCTD lifecycle operator ***replace*** to let FDA know you are updating previously provided content
  - Use CDER NextGen Portal to request a DMF Number or to submit a DMF not required to be in eCTD (like Type III)

QUESTIONS?

- For questions regarding the content of this presentation, please type them into the “Q&A Box” so they can be addressed during the panel Q&A after this session.

- Questions after the workshop can be submitted to esub@fda.hhs.gov