FDA Electronic Common Technical Document (eCTD) Update

PDUFA VI
Public Meeting on
Electronic Submissions and Data Standards

April 12, 2022

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eCTD Guidance Updates

- eCTD 745A(a) Guidance
  - Requirement to submit using the eCTD format
  - Implementation
    - May 2017: NDA, BLA, ANDA
    - May 2018: Commercial IND & Master Files (exemption for Type III)
    - June 2021: Promotional Submissions
  - Waivers
    - Long-term
      - Certain Positron Emission Tomography (PET) submissions
      - Type II DMFs that solely support an application for a PET drug, or a noncommercial IND application may also qualify for a waiver
    - Short-term
      - unique and rare circumstances and for a limited duration
  - *Please review eCTD guidance all details are not included in this presentation*

eCTD Validation Updates

- Study Data Validation
  - Implemented September 15, 2021
    - CDER & CBER Clinical Studies
      - » NDA, BLA, ANDA studies that started after December 17, 2016
    - CDER Non-clinical Studies
      - » NDA, BLA, ANDA studies that started after December 17, 2016
      - » Commercial IND studies started after December 17, 2017
    - For studies that start on or prior to these dates, a simplified TS may be required
  - Implementation March 16, 2023
    - CBER: Non-clinical studies
      - » BLA, Commercial IND, NDA, ANDA studies that start after March 15, 2023
    - For studies that start on or prior to March 15,2023 , a simplified TS may be required
  - *Please review* Study Data Technical Conformance Guide *all details are not included in this presentation*

eCTD Validation Updates

- Study Data Validation Effective Date updated:

  9/15/2021 (CBER module 4 sections, 03/16/2023)

Error	Description
1734	A dataset named ts.xpt with information on study start date must be present for each study in 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, DM dataset and define.xml must be submitted in Module 4 required sections* For SDTM data, DM dataset and define.xml must be submitted in Module 5 required sections* For ADaM, ADSL dataset and define.xml must be submitted in Module 5 required sections*

** Module 4 sections: 4.2.3.1, 4.2.3.2, 4.2.3.4*
Module 5 sections: 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

Please review eCTD Validation Specification all details are not included in this presentation

eCTD Validation Updates

- 1789: A file has been submitted in a study section without providing an STF file
- Ended support of us-regional DTD 2.01 on March 1, 2022. The current version of M1, utilizing DTD 3.3, is required.
- Promotional Submissions (CDER-only)
  - 1551: 2253 submission does not include Product Labeling
  - 1553: The only valid FDA Form to include in a 2253 submission is FDA Form 2253
- Raised File/Document Reference validations to High
  - 1306: No leaf element for file (orphan file)
  - 1323: No file for leaf element

eCTD v4.0 Update – ICH M8 Activities

- ICH eCTD v4.0 Implementation Package
  - V1.4 June 2021
  - See Q&A Change Requests “Incorporated into Implementation package v1.4”
- Q&A/Change Requests
  - Approved
    - Keyword business rules and validation
    - Document Type keyword updates
  - Currently reviewing
    - UUID
    - Priority Number
    - Document Reference
- Regional Implementation Information posted on ICH eCTD v4.0 webpage
  - Regional planned Technical Pilots & Implementation Dates
  - Links to regional Implementation Documents

eCTD v4.0 Update – FDA Activities

- *eCTD v4.0 Technical Conformance Guide* and *FDA eCTD v4.0 Module 1 Implementation Package*
  - Posted February 2020 for public comment
  - Posted updates on January 26, 2021
- *Specifications for eCTD v4.0 Validation Criteria (June 2021)*
- *eCTD v4.0 Comprehensive Table of Contents Headings and Hierarchy (June 2021)*
- Software updates and testing
  - Currently testing eCTD v4.0 vendor software
  - Preparing for eCTD v4.0 Technical Pilot

eCTD v4.0 Update – FDA Implementation Strategy

- Initial release/acceptance for new applications in eCTD v4.0
  - Allows for development of eCTD v4.0 applications across regions
  - Perform testing with industry in 2022
  - Begin accepting new applications in eCTD v4.0 in 2023
- Future phases
  - Transition of current applications
  - Two-way communication

eCTD v4.0 Update – Technical Pilot

- The objective of this testing is to determine if the implementation satisfies the requirements in the technical specification and make any changes prior to accepting eCTD v4.0 submissions in the production environment.
- Identified companies to perform testing
- Technical Pilot Scope
  - Submission Scope
    - Original eCTD v4.0 applications and subsequent submissions (e.g., amendments, supplements)
    - Grouped eCTD v4.0 submissions
  - Enhancement Scope
    - Life-cycle (one-to-one, one-to-many, many-to-one)
    - Document reuse
    - Document ordering
    - Keyword modifications
    - “Group Title” Keyword

eCTD v4.0 Update – How to Prepare

- Discuss eCTD v4.0 development plans with your vendor and/or IT organization
  - Understanding the specifications
  - Is there a plan for transitioning to eCTD v4.0?
  - Send questions to ICH M8 or FDA
- Become familiar with eCTD v4.0 concepts and enhancements
  - ICH Supplemental Documents for eCTD v4.0
    - Support Documentation for eCTD v4.0 Implementation Package - Explains contents enclosed in the Implementation Package. The target audience is business and technical personnel who build and/or review the eCTD v4.0 XML Messages and Transition Mapping Messages.
    - Orientation Material for eCTD v4.0 Implementation Package - Provides an outline of eCTD v4.0 concepts from business perspective. The target audience is business personnel and management involved in any aspect of eCTD submission design and preparation.
  - FDA eCTD v4.0 Technical Conformance Guide
- Know where to find the eCTD v4.0 information

eCTD V4.0 Websites

- ICH eCTD v4.0 Webpage (https://www.ich.org/page/ich-electronic-common-technical-document-ectd-v40)
  - ICH eCTD v4.0 Implementation Package
  - Supplemental Documents for eCTD v4.0 Implementation Package
  - Regional Implementation Information & Regional Links
  - Change Control
    - Process
    - Change Requests & Questions
    - Q&A document
- FDA eCTD v4.0 Webpage

  (https://www.fda.gov/drugs/electronic-regulatory-submission-and-review/electronic-common-technical-document-ectd-v40)
  - FDA eCTD v4.0 M1 Implementation Package
  - eCTD v4.0 Technical Conformance Guide
  - Link to ICH eCTD v4.0 webpage

Thank you