



# **CBER-CDER Data Standards Program Action Plan**

**Version: 1.5**

**FY2024 Q2 update**

**Document Date: May 8, 2024**

**REVISION HISTORY**

Version Number	Revision Date	Description of Change
1.0	January 25, 2023	Revision of document structure to align with FY23-FY27 CBER-CDER Data Standards Strategic Goals
1.1	May 9, 2023	<ul style="list-style-type: none"> <li>• FDA Data Standards Catalog added to Goal 2</li> <li>• IDMP Guidance added to Goal 2</li> <li>• Technical Specifications and Conformance Guide Updates removed from Goal 4</li> <li>• Appendix B updated</li> </ul>
1.2	August 14, 2023	<ul style="list-style-type: none"> <li>• IDMP Guidance removed from Goal 2</li> </ul>
1.3	November 9, 2023	<ul style="list-style-type: none"> <li>• Quarterly project updates</li> </ul>
1.4	February 15, 2024	<ul style="list-style-type: none"> <li>• Added 356H Modernization Project under Goal 1 Objective 1</li> <li>• Removed Submission Data Standards Assessment Project from Goal 1 Objective 1</li> <li>• Added Publication of Final Guidance for Industry “Data Standards for Drug and Biological Product Submissions Containing Real-World Data” Project under Goal 2</li> <li>• Added “Dataset JSON” as its own project under Goal 1 Objective 1</li> </ul>
1.5	May 8, 2024	<ul style="list-style-type: none"> <li>• Added Common Data Model Harmonization (CDMH) under Goal 1 Objective 1</li> </ul>

		<ul style="list-style-type: none"><li>• Removed Source Data Captures from EHRs: Using Standardized Clinical Research Data from Goal 1 Objective 1</li><li>• Removed Publication of Final Guidance for Industry “Data Standards for Drug and Biological Product Submissions Containing Real-World Data” from Goal 2</li></ul>
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## Introduction

The purpose of the *CBER-CDER Data Standards Strategy* is to reinforce the ongoing commitment to the development, implementation, and maintenance of a comprehensive data standards program that will facilitate the pre- and post-market regulatory review process so that safe and effective medical products are available to patients.

This action plan aligns to the CBER-CDER Data Standards Strategy and reflects progress in CBER and CDER towards the defined goals and objectives. Projects selected for this action plan have started, are resourced and funded, and have a scope that is primarily standards related.

## Purpose

This action plan provides a quarterly update to internal and external stakeholders, with an overview and progress update of current data standards initiatives. The plan will continue to be updated quarterly to reflect progress of current projects, as well as initiation of new projects. For information on prior quarters, refer to previous versions of the [Action Plan](#).

## Program Goals and Initiatives

The program goals are derived from the major areas of regulatory business activities. A detailed description of these major areas can be found in the [CBER-CDER Data Standards Strategy](#).

The CBER-CDER Data Standards Program goals focus on four areas:

- Goal 1: Improve Data Standards for Regulatory Use
- Goal 2: Data Standards Policy
- Goal 3: Efficient Information Management
- Goal 4: Enhance Transparency and Stakeholder Engagement

The successful accomplishment of these goals may be achieved given sufficient resources, regulatory/legislative factors, and collaboration with stakeholders.

For each project in this section, the project title, description, update, and project stage(s) are provided. The project update reflects work done in the previous quarter (e.g., the FY2023 Q1 report highlights work from October to December 2022).

The project stage lists the typical stages a project might address during work for the project and are generally conducted in sequence from left to right. The definitions of the project stage are defined in **Appendix A**.

Project Stage
Requirements (REQT)
Analyze Alternatives (ALT)
Development (DEV)
Testing (TEST)
Adoption (ADOPT)
Implementation (IMPL)
Policy (POLICY)

Project Stage Status
In Progress
Pending
Complete
Not Applicable

### Goal 1: Improve Data Standards for Regulatory Use

Projects related to Goal 1 address our continued collaboration with Standards Development Organizations to improve data standards and support initiatives for the adoption and adaptation of new and existing standards.

#### OBJECTIVE 1: Enhancement of Submission Formatting & Review

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>Assessing Applicable Data Standards for Use in Submission of Real-World Data to FDA</b></p> <p>FDA is examining Real-World Data (RWD) and data standards to support submission of RWD to FDA. This assessment will help determine a roadmap for applying data standards for RWD submission to FDA.</p>	<p><b>Q2:</b> Collecting and synthesizing stakeholder feedback.</p>	In Progress	In Progress	Pending	Pending	Pending	Pending	Pending

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>Common Data Model Harmonization (CDMH)</b></p> <p>This project aims to build a data infrastructure for conducting patient-centered outcomes research using Real-World Data (RWD) Derived from the delivery of health care in routine clinical settings. This project started in 2017, is currently in phase III and is a multi-agency initiative.</p>	<p><b>Q2:</b></p> <ul style="list-style-type: none"> <li>- The United States Core for Data for Interoperability (USCDI) Data Elements to CDISC SDTM spreadsheet has been updated to include USCDI, US Core (FHIR Implementation of USCDI).</li> <li>- The USCDI and FHIR US Core to CDISC Study Data Tabulation Model (SDTM) Joint Mapping IG development is in progress.</li> <li>- The CDISC team started the mappings of 3 healthcare domains in US Core FHIR IG: Demographics, Encounters, and Diagnosis.</li> </ul>	Complete	Complete	In Progress	Pending	Pending	Pending	Pending
<p><b>Dataset-JSON Standard</b></p> <p>This CDER project is a collaboration with PHUSE and CDISC to test the use of Dataset-JSON as potential replacement for XPT.</p>	<p><b>Q2:</b></p> <p>Completed review of submissions from industry demonstrating that data integrity was maintained between JSON and XPT dataset packages. Initiated testing in FDA tools and systems to assess impact on dataset package processing and analysis capabilities.</p>	Complete	Complete	In Progress	In Progress	Pending	Pending	Pending



Project Title & Description		Project Status		Project Stages						
				REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>eCTD v4.0 Project – Phase 1</b></p> <p>This CBER-CDER project is focused on the development, testing, adoption, and implementation of the next major version of the electronic Common Technical Document (eCTD), version 4 for new applications. FDA currently uses eCTD version 3.2.2.</p>		<p><b>Q2:</b></p> <p>Continued to test updates provided in eCTD Software, update regional specifications as needed (IG, CV, Validations, CTOC, TCG). Continued work on FDA Implementation.</p>		Not Applicable	Not Applicable	Not Applicable	In Progress	In Progress	In Progress	In Progress
<p><b>Grant: Investigating Support for 21 CFR 11 Compliance Using HL7 FHIR</b></p> <p>As a use case for enabling implementation of audit trailing and provenance capabilities in Real-World Data research, this grant is evaluating approaches to build out elements of the HL7 FHIR standard to support these capabilities. An initial use case is to add audit trail support to FHIR Resources used for recording Patient Reported Outcomes (PROs).</p>		<p><b>Q2:</b></p> <p>On pause while grantee assesses HL7 engagement; this item will not be listed until new activity occurs.</p>		Not Applicable						

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>IDMP Project</b></p> <p>This project has multiple use cases focused on the adoption of ISO Identification of Medicinal Product (IDMP) standards: 1. Medicinal Product ID (MPID), 2. Substance ID (SubID), 3. Pharmaceutical Product ID (PhPID), 4. Route of Administration, Dosage Form, and 5. Units of Measure.</p> <p>These ISO standards define medicinal product information for regional and global data sharing. Generally, the use cases focus on safety (e.g., ICSRs) and can support quality (e.g., PQ/CMC). Additionally, the Global IDMP Working Group (GIDWG) has been engaged with ISO and other regulators to ensure the standards are fit for global implementation.</p>	<p><b>Q2:</b></p> <p>Continued working with EMA and WHO-UMC, via GIDWG to promote the harmonized global ISO IDMP implementation framework. GIDWG has initiated the conduct end-to-end testing focused on Cross-Border healthcare, Pharmacovigilance, and Product Shortage use cases in Q1 &amp; Q2 2024. The plan is to have a full report of findings and next steps at the annual GIDWG stakeholder meeting in Fall 2024. Additionally, the FHIR exchange standard for global exchange of IDMP information continues to be developed.</p> <p>Continued working on Global PhPID Business Rules, preparing to publish in second half of 2024.</p>	<b>Complete</b>	<b>Not Applicable</b>	<b>Complete</b>	<b>In Progress</b>	<b>Pending</b>	<b>Not Applicable</b>	<b>Not Applicable</b>

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>Pharmaceutical Quality/ Chemistry, Manufacturing, and Controls Data Standardization</b></p> <p>This CDER project with participation from CBER and CVM will identify and standardize data elements, terminologies, and data structures to enable automation of key analyses of Pharmaceutical Quality (PQ)/Chemistry, Manufacturing, and Controls (CMC) data to support more efficient and effective regulatory decision-making.</p>	<p><b>Q2:</b></p> <p>Successful testing of Stage 1 PQ/CMC FHIR Implementation Guide (New permanent URL is <a href="https://build.fhir.org/ig/HL7/FHIR-us-pg-cmc-fda">https://build.fhir.org/ig/HL7/FHIR-us-pg-cmc-fda</a> ) at January HL7 Connectathon. <a href="#">Click to view Connectathon track summary page.</a></p> <p>Begin to prepare for taking the IG to ballot in the May 2024 cycle.</p>	Complete	Complete	In Progress	In Progress	Pending	Pending	Pending

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>Questionnaires, Ratings and Scales (QRS) Assessment</b></p> <p>This CDER project is focused on evaluations of proposed standardized data structures that capture the information from Questionnaires, Ratings, and Scales administered to subjects during a clinical study and prioritize the data collection instruments indicated in the Clinical Outcomes Assessment (COA) area.</p>	<p><b>Q2:</b></p> <p>Ongoing at the start of January:</p> <ul style="list-style-type: none"> <li>- CDISC Supplement: Functional Assessment of Anorexia/Cachexia Treatment v4</li> <li>- CDISC Supplement: Functional Assessment of Cancer Therapy-Hepatobiliary v4</li> <li>- CDISC Supplement: Functional Assessment of Cancer Therapy-General v4</li> <li>- CDISC Supplement: Columbia-Suicide Severity Rating Scale Already Enrolled Subjects v1.0</li> <li>- CDISC Supplement: Columbia-Suicide Severity Rating Scale Baseline v2.0</li> <li>- CDISC Supplement: Columbia-Suicide Severity Rating Scale Since Last Visit v2.0</li> </ul> <p>Closed during Q2:</p> <ul style="list-style-type: none"> <li>- CDISC Supplement: Functional Assessment of Anorexia/Cachexia Treatment v4</li> <li>- CDISC Supplement: Functional Assessment of Cancer Therapy-Hepatobiliary v4</li> <li>- CDISC Supplement: Functional Assessment of Cancer Therapy-General v4</li> <li>- CDISC Supplement: Columbia-Suicide Severity Rating Scale Already Enrolled Subjects v1.0</li> </ul>	<p><b>Not Applicable</b></p>						

	<ul style="list-style-type: none"> <li>- CDISC Supplement: Columbia-Suicide Severity Rating Scale Baseline v2.0</li> <li>- CDISC Supplement: Columbia-Suicide Severity Rating Scale Since Last Visit v2.0</li> </ul>	
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Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>SPL FHIR</b></p> <p>FDA is working towards replacing Structured Product Labeling (SPL) with HL7 FHIR. The FDA has created a proof-of-concept system that can receive labeling information using either SPL or FHIR standard (Dual Submission) in addition to a draft Implementation Guide (IG).</p>	<p><b>Q2:</b></p> <p>Continued buildout of FHIR Implementation Guide including revisions reflecting FHIR version R4B. Planning upgrade of FHIR R5.</p> <p>FDA planning to test the IG with Industry participants.</p>	<b>Complete</b>	<b>Complete</b>	<b>In Progress</b>	<b>In Progress</b>	<b>Pending</b>	<b>Pending</b>	<b>Pending</b>

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>Study Data Standards Testing and Evaluation</b></p> <p>This CBER-CDER project tests new and updated study data standards and standards adjacent properties to establish FDA support and requirements.</p>	<p><b>Q2:</b></p> <p>Ongoing at the start of January:</p> <ul style="list-style-type: none"> <li>- CDISC ADaM popPK IGv1.0 (Published/delta review)</li> <li>- CDISC SEND Tumor Combinations v1.0 (Published/delta review)</li> </ul> <p>Initiated:</p> <ul style="list-style-type: none"> <li>- FDA Business Rules for nonclinical study data</li> <li>- CDISC DDF Phase 3 (Public Comment Review)</li> <li>- CDISC Rare Diseases TAUGv1.0 (Published/delta review)</li> <li>- CDSIC SDTMIG-MDv1.1 (Published/delta review)</li> <li>- CDISC ADAMIG-MDv1.0 (Published/delta review)</li> <li>- CDSIC SDTM for Observational Studies-v1.0 (Published/delta review)</li> </ul> <p>Closed during Q2:</p> <ul style="list-style-type: none"> <li>- CDISC DDF Phase 3 (Public Comment Review)</li> <li>- CDISC ADaM popPK IGv1.0 (Published/delta review)</li> </ul>	<p><b>Not Applicable</b></p>						

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>356H Modernization</b></p> <p>This project will be assessing feasibility and working towards development of a machine-readable approach for receiving the data requested in Form FDA 356h.</p>	<p><b>Q2:</b></p> <p>Engaging internally to assess regulatory and IT requirements of project.</p>	In Progress	Pending	Pending	Pending	Pending	Pending	Pending

**OBJECTIVE 2: Improve Pre and Postmarket Safety Surveillance Data**

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>Biologics Effectiveness and Safety (BEST) Innovative Methods (IM)</b></p> <p>Leverages Artificial Intelligence, Machine Learning, FHIR standards and SMART-on-FHIR to develop a semi-automated adverse event (AE) reporting system from EHRs. The system uses such innovative methods to detect exposures/outcomes of biologics and facilitates validation and reporting of flagged cases to the FDA. Project goals include development of tools, methods and techniques needed to reduce the burden on providers to report AEs accurately and efficiently, which is critical to strengthen the post market active surveillance program of CBER regulated products.</p>	<p><b>Q2:</b></p> <p>Continued development. The platform is being migrated to GovCloud to streamline FDA access to data for evaluation and testing.</p>	Complete	Complete	Complete	In Progress	Pending	Pending	Pending



Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<p><b>FDA Adverse Event Reporting System (FAERS) II</b></p> <p>CDER and CBER project is receipt and processing of Investigational New Drug (IND) and post-market safety reports submission using E2B R3 standards.</p>	<p><b>Q2:</b></p> <p>On January 16, 2024, FAERS Electronic Submissions Webpage updated with the information that FDA implemented the Postmarket E2B(R3) standard for electronic transmission of ICSRs and submitters have until April 1, 2026, to implement E2B(R3) standard for electronic transmission. Continued testing and internal implementation activities for Premarket E2B(R3).</p>	Complete	Complete	Complete	Complete	In Progress	In Progress	In Progress

## Goal 2: Data Standards Policy

Projects aligned under Goal 2 provide governance and expertise for the development and revision of data standards policies related to the regulation of human drugs and biologic products. The continued implementation and refining of governance processes ensure proper oversight during the development, publication, and maintenance of guidance documents detailing the use of data standards, terminologies, and exchange formats for regulatory submissions.

Project Title & Description	Project Status	Project Stages						
		REQT	ALT	DEV	TEST	ADOPT	IMPL	POLICY
<b>FDA Data Standards Catalog</b>	<p><b>Q2:</b></p> <p>No version updates in Q2.</p>	Ongoing Updates						
<p><b>Post Approval Changes Rulemaking &amp; Submission Standards</b></p> <p>This CBER-CDER project is focused on improving the usability of post approval submissions data.</p>	<p><b>Q2:</b></p> <p>Rulemaking proposal is currently undergoing internal agency review.</p>	Complete	Not Applicable	In Progress	Not Applicable	Not Applicable	Not Applicable	Pending
<b>Study Data Technical Conformance Guide (sdTCG)</b>	<p><b>Q2:</b></p> <p>Published the March 2024 sdTCG.</p>	Ongoing Semi-Annual Publications						

### **Goal 3: Efficient Information Management**

Projects aligned under Goal 3 promote efficient review process because the data submitted is in a predictable and consistent format that can be more easily used by analytic systems.

As outlined in the [CBER-CDER Data Standards Strategy](#) document, technology is critically important and serves as an enabler for reviewers to access and use large amounts of data and information that is received and generated. Several data standards development projects are already underway, as highlighted earlier in this document, to promote access to high-quality, standardized data including the PQ/CMC Standardization and IDMP projects. CDER and CBER also continues to define and enhance ways to better capture information created internally to support continued knowledge management activities. Progress towards the Goal 3 objectives will be highlighted annually in the Data Standards Program Annual Assessment and not tracked quarterly.

### Goal 4: Enhance Transparency and Promote Stakeholder Engagement

Efforts supported under Goal 4 enhance transparency and promote stakeholder engagement in its decision-making regarding adoption of new standards, especially required standards. In addition, these efforts are promoted through the following activities:

Program Operations	Updates
Action Plan	FY2024 Q1 published February 20, 2024.
Annual Assessment	Published March 20, 2024.
eCTD Submission Standards	File Format Specification updated and published March 2024.
Outreach Opportunities, Public Meetings & Educational Activities	FDA Webinars are planned to focus on various data standards topics Advancing the Use and Development of Common Data Elements in Research DIA Regulatory Submissions, Information, and Document Management (RSIDM) 2024 Forum DIA 2024 Global Labelling Meeting FDA-CDISC Strategic Meeting HL7 Work Group Calls HL7 Work Group Meeting and Connectathon ICH M2, M8, M11, and M4Q(R2) Implementation Work Group Meetings IDMP/GIDWG Meeting International Foundation Process Analytical Chemistry (IFPAC) March 2024 meeting Monthly FDA/CDISC Technical Meetings PHUSE US Connect, Bethesda, U.S.A PHUSE Working Groups Vulcan FHIR Accelerator, co-leads and/or participants in multiple tracks

## Appendix A: Project Stage Definitions

Stage Name	Stage Description
<b>Requirements</b>	A project with the objective of developing a standard, or utilizing an existing standard for the receipt, processing, review, and archive of data used in regulatory review is considered a data standards project.
<b>Analyze Alternatives</b>	A projects approach to the identification and analysis of alternatives to solve a data standards problem.
<b>Development</b>	The approach to address approved changes to data standards or data standards policy.
<b>Test</b>	A project may be required to test (CDER) study data standards that is adaptable based on the situation. Provides a process to determine if a standard meets the needs of the FDA and should be accepted by the FDA.
<b>Determine Data Standard Adoption (Adoption)</b>	The project is approved and proceeds towards the adoption.
<b>Implement Standard (Implementation)</b>	The advancement to implementing an approved data standard need or change.
<b>Policy</b>	FDA may publish an FRN or guidance, as well as relevant technical specifications or technical conformance guides, as needed.

## Appendix B: Glossary of Acronyms

ADaM	Analysis Data Model
AE	Adverse Events
Catalog	FDA Data Standards Catalog
CBER	Center for Biologics Evaluation and Research
CDER	Center for Drug Evaluation and Research
CDISC	Clinical Data Interchange Standards Consortium
COA	Clinical Outcomes Assessment
eCTD	Electronic Common Technical Document
EHR	Electronic Health Record
FHIR	Fast Healthcare Interoperability Resource
FRN	Federal Register Notice
FY	Fiscal Year
GSRS	Global Substance Registration System
HL7	Health Level Seven
ICH	International Council for Harmonization
ICSR	Individual Case Safety Report
IDMP	Identification of Medicinal Product
IND	Investigational New Drug
ISO	International Organization for Standardization
PDUFA	Prescription Drug User Fee Act
PQ/CMC	Pharmaceutical Quality/Chemistry, Manufacturing, and Controls
QRS	Questionnaires, Ratings, and Scales
SDTM	Study Data Tabulation Model
SDTMIG	Study Data Tabulation Model Implementation Guide
SEND	Standard for Exchange of Nonclinical Data
SENDIG	Standard for Exchange of Nonclinical Data Implementation Guide
SENDIG-AR	Standard for Exchange of Nonclinical Data Implementation Guide: Animal Rule
SPL	Structured Product Labeling
sdTCG	Study Data Technical Conformance Guide
TAUG	CDISC Therapeutic Area User Guide

TCG	Technical Conformance Guide
UMC	Uppsala Monitoring Centre
UNII	Unique Ingredient Identifier