

CHANGES IN FDA TECHNICAL CONFORMANCE GUIDE V3.1

14-Feb-2017, Eschborn , Clinipace Marion Friebel





DEFINITION

- This Study Data Technical Conformance Guide provides specification, recommendations and general considerations on how to submit standardized study data using FDA-support
- The guide is separated in the same sections as before:
 - Section 1: **Introduction** provides information on regulatory policy and guidance background, purpose, and document control.
 - Section 2: **Planning and Providing Standardized Study Data** recommends and provides details on preparing an overall study data standardization plan, a study data reviewer's guide and an analysis data reviewer's guide.
 - Section 3: Exchange Format Electronic Submissions presents the specifications, considerations, and recommendations for the file formats currently supported by FDA.



DEFINITION - CONTINUE

- Section 4: **Study Data Submission Format: Clinical and Nonclinical** presents general considerations and specifications for sponsors using, for example, the following standards for the submission of study data: Study Data Tabulation Model (SDTM), Analysis Data Model (ADaM), and Standard for Exchange of Nonclinical Data (SEND).
- Section 5: **Therapeutic Area Standards** presents supplemental considerations and specific recommendations when sponsors submit study data using FDA-supported therapeutic area standards (TA).
- Section 6: **Terminology** presents general considerations and specific recommendations when using controlled terminologies/vocabularies for clinical trial data.
- Section 7: **Electronic Submission Format** provides specifications and recommendations on submitting study data using the electronic Common Technical Document (eCTD) format.
- Section 8: **Data Validation and Traceability** provides general recommendations on conformance to standards, data validation rules, data traceability expectations, and legacy data conversion.

CHANGES FROM GUIDE V3.0 TO GUIDE V3.1 (RELEASED JULY 2016) –UPDATES IN SECTION 2.1

- For Study Data Standardization Plan the acronym "SDSP" was added. A specific template for the Study Data Standardization Plan is not specified but a useful link as footnote for recommendations (template, completion guidelines and examples) is included now.
- http://www.phusewiki.org/wiki/index.php?title=Study_Data_Standardization_Plan %28SDSP%29

UPDATES IN SECTION 4.1.

4.1.1.3 SDTM Domain Specifications

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Trial Design

All Trial Design datasets should be included in SDTM submissions as a way to describe the planned conduct of a clinical trial.

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Trial Design Model (TDM)

The SDTMIG TDM should be followed to define the treatment groups and planned visits and assessments that will be experienced by trial subjects. The TDM defines a standard structure for representing the planned sequence of events and the treatment plan for the trial. The TDM includes Trial Arms, Trial Elements, Trial Visit, Trial Inclusion/Exclusion Criteria, Trial Summary, and Trial Disease Assessment.

All TDM datasets should be included in SDTM submissions as a way to describe the planned conduct of a clinical trial. Specifically, the Trial Summary (TS) dataset will be used to determine the time of study start. The requirement to submit using a particular study data standard is dependent on its support by FDA as listed in the FDA Data Standards Catalog at the time of study start. TSPARMCD = SSTDTC will allow the determination of the study start date and should be included in all SDTM submissions.

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As noted in section 1.1, the submission of standardized study data will be required according to the timetable specified in the eStudy Data guidance. FDA recognizes that during the transition period to required study data standards some study data submissions (i.e., legacy data) may not conform to the standards listed in the FDA Data Standards Catalog. During this transition period sponsors submitting legacy data should provide a TS dataset (ts.xpt) which includes the study start date in the form of SSTDTC (TSPARMCD = SSTDTC) and TSVAL= "yyyy-mm-dd".

CONTINUE - UPDATES IN SECTION 4.1.

4.1.3.3 SEND Domain Specification

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Trial Design (TD)

The TD defines a collection of domains which describe the planned study design.

All TD datasets should be included in SEND submissions as a way to describe the planned conduct of a nonclinical trial. Specifically, the Trial Summary (TS) dataset will be used to determine the time of study start. The requirement to submit using a particular study data standard is dependent on its support by FDA as listed in the FDA Data Standards Catalog at the time of study start. TSPARMCD = STSTDTC will allow the determination of the study start date and should be included in all SEND submissions.

As noted in section 1.1, the submission of standardized study data will be required according to the timetable specified in the eStudy Data guidance. FDA recognizes that during the transition period to required study data standards some study data submissions (i.e., legacy data) may not conform to the standards listed in the FDA Data Standards Catalog. During this transition period sponsors submitting legacy data should provide a TS dataset (ts.xpt) which includes the study start date in the form of TSPARMCD = STSTDTC and TSVAL= "yyyy-mm-dd."

UPDATES IN SECTION 5.2, SUPPORTED THERAPEUTIC AREAS

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Generally, when a data standard is released for public use by the SDO, it is not supported by FDA and is not listed in the FDA Data Standards Catalog. FDA will perform acceptance testing on the standard to confirm its ability to process, review and archive. The CDISC data elements associated with following therapeutic areas are supported by FDA:

- 5.2.1 Chronic Hepatitis C
- 5.2.2 Dyslipidemia

Generally, when a data standard is released for public use by the SDO, it is not supported by FDA and is not listed in the FDA Data Standards Catalog. FDA performs acceptance testing to determine its ability to support new TA data elements.³² The DISC data elements associated with following therapeutic areas are supported by FDA:

- 5.2.1 Chronic Hepatitis C
- 5.2.2 Dyslipidemia
- 5.2.3 Diabetes
- 5.2.4 OT Studies
- 5.2.5 Tuberculosis

UPDATES IN SECTION 8.2

8.2.1 Types of Data Validation Rules

Generally, FDA recognizes two types of validation rules:

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Conformance validation: These rules help ensure that the data conform to the data standards. For example, a conformance validation rule for CDISC SDTM data would check that the value in the Domain column of all datasets matches the name of the domain.

Quality checks: These checks help to ensure the data will support meaningful analysis. For example, a quality check for a particular human study may require that each value for AGE fall within a pre-specified human physiologic range.

Once a data standard is defined, the conformance validation rules are generally static. They are not expected to change substantially unless the standard itself changes. However, new analysis requirements or specific studies may suggest additional quality checks and these will be incorporated into data validation processes.

8.2.1.1 Conformance validation

Conformance validation rules help ensure that the study data conform to the study data standards listed in the FDA Data Standards Catalog. For example, using SDTM/ADaM, the inclusion of ts.xpt, dm.xpt, define.xml and ADSL should always be included in a standardized study data submission.

8.2.1.2 Quality enecks

These checks help to ensure the data will support meaningful analysis. For example, a quality check for a particular human study may require that each value for AGE fall within a pre-specified human physiologic range.

once a study data standard is defined, the conformance validation rules are generally static. They are not expected to change substantially unless the standard itself changes. However, new analysis requirements or specific studies may suggest additional quality checks and these will be incorporated into study data validation processes.

THANK YOU