U.S. FOOD & DRUG ADMINISTRATION

"This presentation reflects the views of the author and should not be construed to represent FDA's views or policies."

Helena Sviglin, FDA CDER, June 2019

WHAT'S RULES GOT TO DO WITH IT?

Bet you're thinking..

Here are the Rules

- Technical Rejection Criteria (TRC) - FDA

  https://www.fda.gov/media/100743/download

  FDA Business Rules (BR) - FDA

  https://www.fda.gov/media/116935/download

  FDA Validator Rules (VR) - FDA

  https://www.fda.gov/media/103587/download

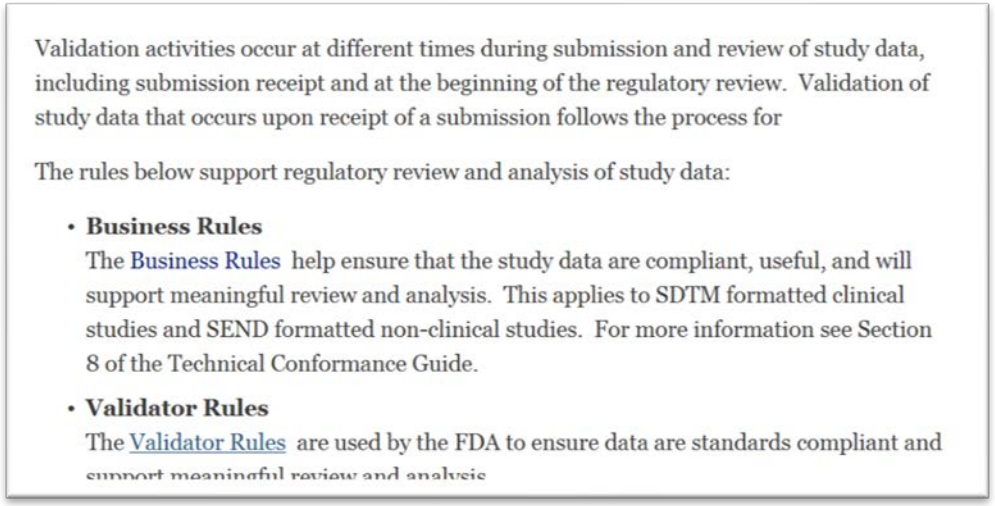
  CDISC Conformance Rules - CDISC

  www.cdisc.org

And here's where we use them at CDER (Validation Activities)

"Validation activities occur at different times during submission and review of study data, including submission receipt and at the beginning of the regulatory review."

https://www.fda.gov/industry/fda-resources-data-standards/study-data-standards-resources



Validation activities occur at different times during submission and review of study data, including submission receipt and at the beginning of the regulatory review. Validation of study data that occurs upon receipt of a submission follows the process for

The rules below support regulatory review and analysis of study data:

- **Business Rules**
  The Business Rules help ensure that the study data are compliant, useful, and will support meaningful review and analysis. This applies to SDTM formatted clinical studies and SEND formatted non-clinical studies. For more information see Section 8 of the Technical Conformance Guide.
- **Validator Rules**
  The Validator Rules are used by the FDA to ensure data are standards compliant and support meaningful review and analysis

In CDER Validation Activities occur

- At the CDER Electronic Submissions Gateway by OBI at ESG aka ‘the Gateway’
- For certain test submissions by OBI at CDER
- Before loading into certain review tools by OCS at CDER
- In support of services provided by OCS (JumpStart, KickStart, and CoreDF Service) after the Gateway

Map of Rules + Validation Activities

One by One…

Technical Rejection Criteria (TRC)

Disclaimer – *I'm not the expert*

- eCTD vs. Data
- Managed by Office of Bioinformatics (OBI) in CDER
- Technical Rejection Criteria Document revised January 22, 2019
- https://www.fda.gov/media/100743/download

Technical Rejection Criteria (TRC) and validation activities

- Will be utilized at the Electronic Submissions Gateway
- With a tool developed for this specific purpose
- Haven't been turned on yet *(90 days notice)*

FDA Business Rules

"The Business Rules help ensure that the study data are compliant, useful, and will support meaningful review and analysis. This applies to SDTM formatted clinical studies and SEND formatted non-clinical studies. For more information see Section 8 of the Technical Conformance Guide."

https://www.fda.gov/media/116935/download

FDA Business Rules

- Human readable
- Reflect our current business practice and regulatory review requirements transparently
- Not comprehensive (yet)
- Standards agnostic (where possible)
- Updated regularly
- Aligns with Study Data Technical Conformance Guide (aka sdTCG aka TCG)

FDA Business Rules and validation activities

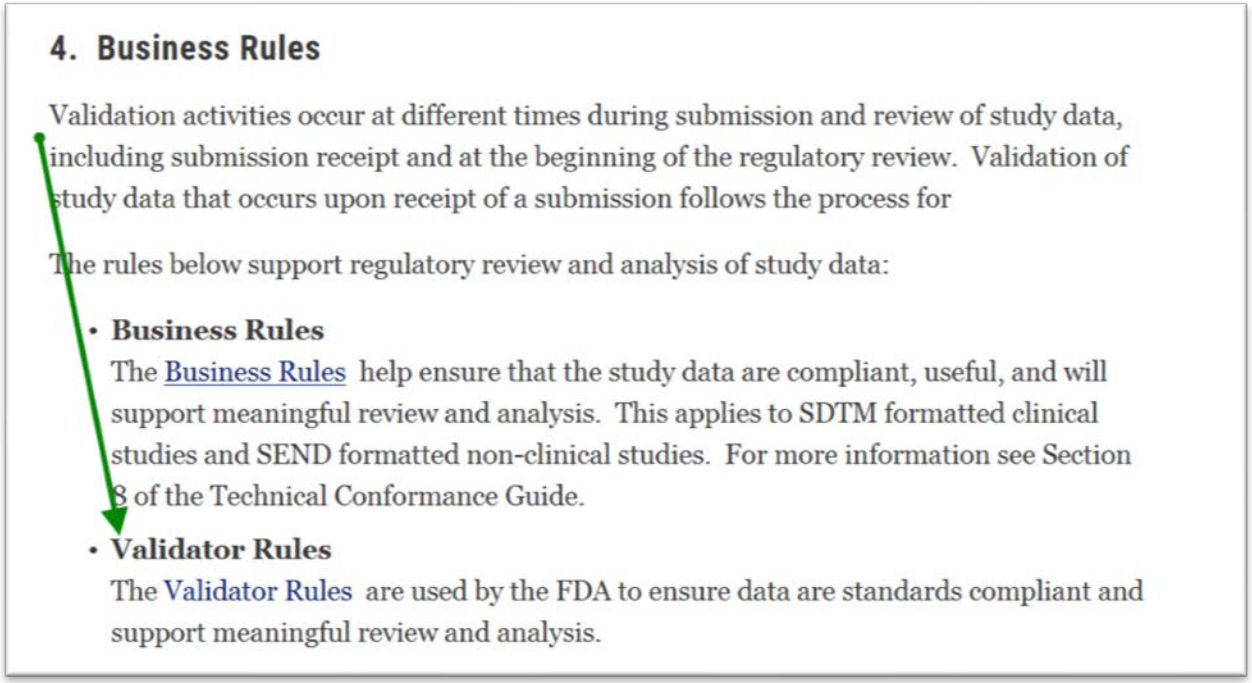
- Used by FDA Validator in the Office of Computational Science in CDER
- Also used by CBER

FDA Validator Rules

- FDA Validator checks submitted study data against:
  - CDISC Conformance Rules for the specific IG/model used for the study data
  - FDA Business Rules
  - Best practices from JumpStart and KickStart (CDER)
  - Office of Computational Science (OCS) in CDER tool loading requirements
- Each FDA Validator rule *should* indicate which of the above it is checking the study data against.

FDA Validator Rules

- https://www.fda.gov/media/116935/download



4. Business Rules

Validation activities occur at different times during submission and review of study data, including submission receipt and at the beginning of the regulatory review. Validation of study data that occurs upon receipt of a submission follows the process for

The rules below support regulatory review and analysis of study data:

- **Business Rules**
  The Business Rules help ensure that the study data are compliant, useful, and will support meaningful review and analysis. This applies to SDTM formatted clinical studies and SEND formatted non-clinical studies. For more information see Section 8 of the Technical Conformance Guide.
- **Validator Rules**
  The Validator Rules are used by the FDA to ensure data are standards compliant and support meaningful review and analysis.

FDA Validator Rules and validation activities

- Used by Office of Computational Science (OCS) to support their tools and services provided to reviewers
- Compares study data to other rule sets
- Also used by CBER
- At CDER the FDA Validator is used AFTER the Electronic Submissions Gateway
- Results are made available to review teams
- Not all studies get run through the FDA Validator yet

CDISC Conformance Rules

- www.cdisc.org
- Developed by CDISC to further describe and interpret their standards
- Currently specific to an implementation guide
- FDA Business Rules will no longer try to define conformance to any CDISC standard

CDISC Conformance Rules and validation activities

- FDA Validator checks study data against CDISC Conformance Rules

Shameless plug

- *We all need Conformance Rules*
- *Development is an **enormous** task*
- *Please consider volunteering hours to CDISC*


FDA
U.S. FOOD & DRUG
ADMINISTRATION