

IRISS-Forum

eCTD Tool Interoperability Group

August 18, 2010

Attendees (29)

IRISS Announcements (Deanna Murden)

- IRISS is growing and needs to have a general update meeting to share information for those that do not have the time to participate in the individual topic groups. We currently have over 300 registered members and many unregistered as well.
- Agency participation in the Interoperability topic group has been strong. We are excited to have the level of agency participation and wish to continue and expand agency participation from additional countries by reducing the frequency of meetings and adding additional structure.
- The Interoperability group will switch to a quarterly teleconference schedule. The agenda will continue with agency updates and responses to questions submitted prior to the meeting, high level updates from each of the topic groups (currently 6), and an update on the ETICS III project.
- The Labeling topic group will be kicking off this fall under the leadership of Ron Celeste.
- The Global Submission Operations (GSO) topic group will be kicking off in September (Tracy Naughton, AstraZeneca)
- IRISS has submitted the paperwork to become a 501(C)(6) Not for Profit Organization.
 - An effort to recruit companies as Founding Sponsors is currently underway.
 - A new website is being designed which will include an online membership fee structure with portions of the website being restricted to members only. Members will also be able to register for topic groups and maintain their profile information (e.g. email address).
 - A funding campaign will kick off as soon as the website is up and running.

Agency Updates and Specific Questions:

- EMA (not represented on the call)
- FDA (Ginny Hussong)
 - An email was sent to the agency prior to the meeting regarding the following:
 - Plan for the roll out of Global Submit Validate 2010 application
 - Is there an impact outside of the FDA (e.g. new validation criteria, etc.)?
 - What are the timelines of the roll out?
 - How will vendors be impacted?
 - How will sponsors be impacted?
 - FDA eMAIL RESPONSE: *When we do implement GSV 2010, we realize that the tool vendors along with industry will need time to change over to the new validation rules. We do not anticipate difficulty, since we currently only reject based on high errors and cases of excessive medium errors. The new highs do not represent a change from what we have been validating against so far (but just hadn't published). Our automated*

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system currently checks for these error conditions and will generate a failure notice if these conditions occur. The new high errors are the following:

- More than one version of the regional files exist
- Application number is not valid
- Application type is not valid
- Application number in the form does not match the application number in the XML backbone
- Wrong application form

We have also removed 8 high errors, as they are either replaced by other high errors or no error is necessary since a general failure to load will occur (for example, invalid XML).

- Module 1 will be updated to include changes brought about by the update to the DARRTS tracking system, FDA Form 3674 is missing, enable DDMAC to accept eCTD formatted submissions, include a Technical Contact, add subtypes to application types. New DTD will be ready this fall with implementation within a year.
- GS Validate 2010 will not be deploying in October due to Data Center move to a contracted hosted site in Virginia. CDER data is moving this weekend. GS Validate may be deployed in January with new validation codes as well.
- valid-values.xml v3.0 will not be accepted by the agency until it is posted on their website and this won't happen until the GS Validate 2010 software is deployed.
- Health Canada (Vianney Caron)
 - The agency will be publishing a notice revising the eCTD scope in the next few weeks. This will include new submission types in eCTD format and the introduction of e-only filing format. **Post meeting note: This was posted on 2010-08-20.**
 - A revised Q&A for the eCTD is expected to be released in the fall/winter.
 - A significant update to Canadian M1 DTD is expected to be released in 2011.
- Swissmedic (not represented on the call)
- TGA – Australia (John Donohoe)
 - No updates at this time

Follow up to previous topic(s) (Lenore Palma)

- Submission of modified or additional datasets
 - When a dataset(s) changes (replace) and the define does not, how should this be handled? Should the define document be replaced even if nothing is changing in it (since this goes against eCTD principles) or should it be replaced because the hyperlink is no longer valid?
 - Response from CDER eDATA: *When the sponsor's submission is made, via the gateway or through delivery to the agency, a sequence number specified by the sponsor is used for change management and traceability. The submission (IND/NDA, etc) assigned number and the sequence number are tested to ensure the sequence number has not been previously used. If it has been used previously, a refusal to file occurs and the submission is rejected. Given the process of change management, the agency recommends that the dataset changes (replace) include only those datasets that have changed or any new datasets for the new sequence number provided. The define.xml*

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and/or define.pdf in the directory with the datasets should “define” the datasets per the guidance and the location for the transport file(s) (.xpt(s)) should be linked in the file(s) in the same or relative directory. All “defines” (including index.xml and study specific xml and/or pdf) referencing the new or changed datasets should be updated and included in the submission. All datasets should be hyperlinked in the submission’s “defines”. For example, a hypothetical sequence number 0001 updating an AE dataset should include the updated m5 directory with the “defines” (corresponding hyperlinks) updated to the changes in the submission. The eCTD xml files provided by the sponsor in the submission control the life cycle management of objects in the submissions. Please reference “The eCTD Backbone File Specification for Study Tagging Files” for further guidance

(<http://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM163560.pdf>).

- When a dataset(s) changes (replace) and some of the define document aspects for those replaced datasets change, how should this be handled? For example, let’s say that there were originally 50 datasets and 2 are being replaced.
 - Should a new define be submitted with just the changed information on the 2 datasets (new? append?)?
 - Should a new define with the old and new information replace the old define, and everything be re-hyperlinked in the replacement define (i.e. the 2 new replaced datasets plus back to the 48 original unchanged datasets)?
 - Other options?
- Response from CDER eDATA: *The comments above apply to these questions as well. Please only submit “changed” or “new” datasets in subsequent submission sequences.*
The current reference is the Study Data Specifications, (<http://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/FormsSubmissionRequirements/ElectronicSubmissions/UCM199759.pdf>) which provides most conducive data content definition and structure for the review team, although this may vary based on the submission and reviewing division (pg. 2).

ETICS III Status Update (Harv Martens)

- Phase I – analysis is continuing with a target to complete by the end of August
- Phase II – just kicking off with the following target dates
 - 30-Sep-2010 – information provided to vendors
 - 1-Feb-2011 – wrap up of analysis with presentation to industry later in the month

Best Practice Document (Barbara Jentges)

- The rationale to creating this document was to collect and categorize meeting notes. This will be a living document in that it will be periodically updated with closure to open items and the addition of new items.
- We are looking for volunteers to assist with investigating/discussing/resolving the open items. Please contact Lenore if you would like to participate.

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Moving from PDF v1.4 to ISO 32000 / PDF 1.7 (Andrew Marr)

- ICH M2 is generally in alignment around ISO 32000 as an acceptable format for PDF files in all regions
- The EU is polling its member countries and so far the results are positive
 - Outstanding issue to be decided by each agency - if PDF v1.7 is an ICH accepted version, will agencies then accept PDF versions 1.5 and 1.6 as well?

2010-2011 Teleconference Schedule:

17-Nov (7:30-9:00 am (US Eastern Time, UTC/GMT -5 hours))

23-Feb (7:30-9:00 am (US Eastern Time, UTC/GMT -5 hours))

18-May (7:30-9:00 am (US Eastern Daylight Time, UTC/GMT -4 hours))

17-Aug (7:30-9:00 am (US Eastern Daylight Time, UTC/GMT -4 hours))

16-Nov (7:30-9:00 am (US Eastern Time, UTC/GMT -5 hours))