

Submitting Study Datasets for Vaccines to the Office of Vaccines Research and Review

Guidance for Industry

Technical Specifications Document

This guidance is for immediate implementation.

FDA is issuing this guidance for immediate implementation in accordance with 21 CFR 10.115(g)(4)(i). Submit one set of either electronic or written comments on this guidance at any time. Submit electronic comments to <https://www.regulations.gov>. Submit written comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. You should identify all comments with docket number FDA-2018-D-1358.

Additional copies of this guidance are available from the Office of Communication, Outreach and Development (OCOD), 10903 New Hampshire Ave., Bldg. 71, Rm. 3128, Silver Spring, MD 20993-0002, or by calling 1-800-835-4709 or 240-402-8010, or email ocod@fda.hhs.gov, or from the Internet at <https://www.fda.gov/BiologicsBloodVaccines/GuidanceComplianceRegulatoryInformation/Guidances/default.htm>.

For questions on the content of this guidance, contact OCOD at the phone numbers or email address listed above.

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Contains Nonbinding Recommendations

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This guidance represents the current thinking of the Food and Drug Administration (FDA or Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the FDA staff responsible for this guidance as listed on the title page.

1.0 INTRODUCTION

This technical specifications document provides detailed information and specifications for the content of datasets submitted to FDA's Center for Biologics Evaluation and Research (CBER) Office of Vaccines Research and Review (OVR) and is designed to aid clinical and statistical reviewers in the review of vaccine applications, e.g., biologics license applications. We recommend submission of these datasets as part of the applicant's data tabulation datasets. The submission of standardized datasets facilitates review and analyses of the data and allows for pooling of data, when appropriate. These specifications reflect current CBER OVR thinking, are built to be consistent with the FDA Study Data Technical Conformance Guide¹, and are generally consistent with the Therapeutic Area User Guide (TAUG) for Vaccines².

If there is a question regarding a specific submission or implementation of a particular data standard, the sponsor should contact the appropriate review division in OVR for specific submission questions or the appropriate contact for data standards issues at cber.cdisc@fda.hhs.gov. For more general recommendations on the use and submission of standardized trial data, the sponsor should refer to the FDA Study Data Technical Conformance Guide.

FDA's guidance documents, including this guidance, do not establish legally enforceable responsibilities. Instead, guidance describes the FDA's current thinking on a topic and should be viewed only as recommendations unless specific regulatory or statutory requirements are cited. The use of the word *should* in FDA's guidance means that something is suggested or recommended but not required.

¹<https://www.fda.gov/downloads/forindustry/datastandards/studydatastandards/ucm384744.pdf>.

²<https://www.cdisc.org/standards/therapeutic-areas/vaccines>.

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2.0 SUBMISSION OF DATA FOR VACCINE TRIALS

The domains to be utilized in all Study Data Tabulation Model (SDTM) datasets submitted to OVRP include: Trial Summary (TS), Demographics (DM), Subject Visits (SV), Concomitant Medications (CM), Exposure (EX), Disposition (DS), Protocol Deviations (DV), and Medical History (MH). If a physical exam is included in the protocol, the information should be included in the Physical Exam (PE) domain. Similarly, if safety labs are included in the protocol, the information should be included in the Laboratory Test Results (LB) domain. Usage of the Adverse Event (AE), Clinical Event (CE), Findings About (FA), Vital Signs (VS), and Microbiology Specimen (MB) domains will be detailed below.

The DS domain should always include the Standardized Disposition Name (DECOD), Reported Term (TERM), Category (CAT), and Start Date/Time of Event (STDTC) variables. If relevant (i.e., multiple doses administered over time), the DS domain should include the use of the Order of Element within Arm (TAETORD) timing variable.

In addition, the domains and variables to be utilized for safety, immunogenicity, and efficacy (i.e., clinical disease endpoint) data are detailed below.

3.0 SUBMISSION OF SAFETY DATA FOR VACCINE TRIALS

Safety data submitted for vaccine clinical trials should include reactogenicity data (i.e., a set of prespecified AEs collected within a prespecified time frame, often referred to as solicited AEs or reactions), unsolicited AEs, medically attended adverse events (MAAEs), and death. The sections below will detail the usage of domains and variables expected in submissions to OVRP. Any usage of domains and variables that differ from these recommendations will need to be agreed upon prior to submission of datasets.

3.1 Reactogenicity Data

Reactogenicity data should be represented primarily in the CE domain with the Findings About Clinical Event (FACE) domain and VS domain to provide the specific information for each event. A more detailed description of how reactogenicity data should be collected is described in the Vaccine TAUG². We prefer that the Vaccine TAUG “flat model” be utilized, i.e., that data for each day be included, even if a subject never experienced a particular event. However, the “nested model,” which includes only a summary record for a particular event if a subject never experienced that event, may be necessary for large trials with significant amounts of data. Sponsors should discuss which model is appropriate with their review team prior to beginning their clinical trial.

In the flat model, the CE dataset should include a record for each event for each subject, with the Clinical Event Reported Term (CETERM) as the event name and the Clinical Event Occurrence (CEOCCUR) = “Y” or “N.” If an event occurred, the clinical event start day/date (CESTDY/CESTDTC) and end day/date (CEENDY/CEENDTC) of the reactogenicity event should be collected and included in the dataset. If it is unknown

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when an event started and/or ended (e.g., because the diary card was not completed), the variable(s) CESTDTC and/or CEENDTC should be null, and a comment should be provided in the Comments (CO) domain. The pattern of the event (e.g., continuous or intermittent) can be noted by using the Clinical Event Pattern of Events (CEPATT) variable, if collected. In both cases, the daily records are represented in FACE. All daily temperature measurements are represented in the VS domain. A dataset-level relationship in Related Records (RELREC) should be used to represent relationships between CE and FACE and between VS and assessments of fever in CE.

The annotated Case Report Form (CRF) should include a check box to indicate whether the reactogenicity event did or did not occur, during the prespecified time frame. A check box in the annotated CRF should also capture whether the reactogenicity event was collected every day, during the assessment interval for a subject. If the Occurrence (OCCUR) variable is null, the Completion Status (--STAT) and Reason Not Done (--REASND) variables in FACE and VS and CE (covering the assessment interval) should be utilized.

Reactogenicity events should be indicated by using “reactogenicity” in the variable Clinical Event Category (CECAT). It should be further subcategorized into “administration site” or “systemic,” using the variable Clinical Event Subcategory (CESCAT).

If a reactogenicity event should happen to continue beyond the assessment interval, it should also be represented in the AE domain, with the CE domain record indicating that the event extended beyond the assessment interval, using the variables Clinical Event End Reference Time Point (CEENTPT) (e.g., “Day 7”) and Clinical Event End Relative to Reference Time Point (CEENRTPT) (“Ongoing”). A check box in the CRF, indicating whether the reactogenicity event is ongoing after the assessment period, is recommended. The event should be categorized in the Adverse Event Category (AECAT) variable as “reactogenicity.” The start day/date (--STDY/--STDTC) and the end day/date (--ENDY/--ENDTC) of the reactogenicity event should be identical in both the CE and AE domain; whereas the duration (--DUR) should report the time that the event occurred as part of the assessment interval and as part of the continuance separately (e.g., an event that lasted 6 days in the assessment interval and 3 days beyond the assessment would be reported as Clinical Event Duration (CEDUR) = 6 days and Adverse Event Duration (AEDUR) = 3 days). We recommend one or more check boxes in the CRF, indicating the duration of the reactogenicity event in the assessment period and the duration of the reactogenicity event beyond the assessment period. If a reactogenicity event rises to the level of a Serious AE (SAE) during the prespecified assessment interval, it should be reported in the AE domain, and the Serious Adverse Event (AESER) variable should be utilized. The event should be categorized in the AECAT as “reactogenicity.” A dataset-level relationship in RELREC should be used for each case. We prefer that, in both cases, FACE (and VS) be utilized to provide the day-to-day data for the reactogenicity event from start to end.

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3.2 Unsolicited Adverse Events (AEs)

Unsolicited AEs should be represented in the AE domain, regardless of whether they occurred during the prespecified assessment interval or after the prespecified assessment interval. The clinical details of the AE should be represented in the Findings About Adverse Event (FAAE) domain and possibly in the VS, CM, Procedures (PR), Healthcare Encounter (HO), and Death Detail (DD) domains.

In the AE domain, there should be one record per AE per subject for each unique event. The AE record reported by the investigator is submitted as a summary record, “collapsed” to the highest level of severity, causality, seriousness, and final outcome. The variables for study day/date should be utilized (AESTDY/AESTDTC and AEENDY/AEENDTC). The FAAE domain should be used to report the day-to-day information, concerning the AE. The CM, PR, HO, and/or DD domains should be utilized if the corresponding variables in AE are marked as “yes.” A dataset-level relationship in RELREC should be used.

3.3 Laboratory Safety Assessments

Laboratory safety assessment of clinical chemistry, hematology, and urine should be included in the LB domain. If the laboratory result for a particular assessment for a subject is outside the normal range, it should additionally be reported in the AE domain, with the highest level noted. A dataset-level relationship in RELREC should be used.

3.4 Medically Attended Adverse Events (MAAEs)

MAAEs, to include potential immune-mediated medical conditions (PIMMC), should be reported in the AE domain, and if needed, additional data should be reported in the FAAE, VS, HO, and/or DD domains.

In certain circumstances, OVRP may request that a clinical trial protocol include collection of data relating to specific MAAEs, particularly autoimmune or auto-inflammatory diseases, among subjects in all treatment groups through 12 months or longer, following the last study vaccination. Since the request for this information is based on a theoretical potential, CBER considers the occurrence of a vaccine-related PIMMC to be unexpected. MAAEs should be reported in the AE domain and should be flagged by using CAT of “PIMMC.”

New onset of a chronic disease (NOCD) should be reported in the AE domain and categorized in CAT with “NOCD.”

If a chronic disease is exacerbated, following a vaccination, the MH domain should contain information on the disease, prior to the first day of vaccination, and the AE domain should contain information on the disease, following vaccination. The CAT and Subcategory (-SCAT) variables should be populated in both domains with a

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categorization/subcategorization of the chronic disease, e.g., kidney failure would be categorized as “renal medical history” and subcategorized as “renal failure.” A dataset-level relationship in RELREC should be used.

3.5 Deaths

When a death occurs, it should be reported in the AE domain with supplemental information provided in the DD domain. The DM domain should also indicate that a death has occurred, using the flag variable (DTHFL) and date/time of death variable (DTHDTC). A dataset-level relationship in RELREC should be used.

4.0 SUBMISSION OF CLINICAL DISEASE ENDPOINT EFFICACY DATA FOR VACCINE TRIALS

For clinical trials where clinical disease endpoint efficacy is an objective, efficacy data will primarily be reported in the CE domain with specific information provided in the MB domain, VS domain, and PE domain (if necessary).

To differentiate an efficacy clinical event (i.e., case of the disease of interest) from other clinical events, the variable CECAT should be utilized, and “efficacy” should be stated. Since efficacy is pre-specified, the variables CEOCCUR, Clinical Event Completion Status (CESTAT), and Clinical Event Reason Not Collected (CEREASND) should be included. The CETERM for the efficacy clinical event should be indicative of the disease, e.g., for an influenza vaccine, “influenza-like illness or ILI;” or for a human papillomavirus vaccine, “cervical intraepithelial neoplasia or CIN.” Test results from assays conducted to confirm the presence of the microbe of interest (e.g., polymerase chain reaction (PCR), enzyme-linked immunosorbent assay (ELISA), cell culture, etc.) should be reported in the MB domain. If the disease of interest is confirmed (e.g., by the clinical investigator or by an adjudication committee, using the information from a clinical assessment and the results of confirmatory tests), it should be flagged in a supplemental DM domain with Qualifier Variable Name (QNAM) = “CECASE,” Qualifier Variable Label (QLABEL) = “clinical endpoint case flag,” and Supplemental Qualifier Value (QVAL) = “Y.” If the disease of interest is not confirmed by either the clinical investigator or by an adjudication committee, the results should be flagged in a supplemental DM domain with QNAM = “CECASE,” QLABEL = “clinical endpoint case flag,” and QVAL = “N.” The manner in which the occurrence of a disease of interest is confirmed (e.g., by an adjudication committee or by the clinical investigator or by another mechanism) should be clearly delineated in the clinical protocol. A check box in the CRF, indicating the status of the disease of interest, is recommended.

If a healthcare encounter occurs during the clinical trial because of occurrence of the “disease of interest,” the CE domain variable Clinical Event Requires or Prolongs Hospitalization (CESHOSP) should be marked with “Y.” Additional data, regarding the healthcare encounter, should be provided in the HO domain.

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If concomitant or additional treatment is prescribed to alleviate the severity of the disease of interest, the CE domain variable Clinical Event Concomitant or Additional Treatment Given (CECONTRT) should be utilized.

Variables available in AE that are also available for use in CE consist of –DUR, Outcome of Event (OUT), Involves Cancer (SCAN), Congenital Anomaly or Birth Defect (SCONG), Persistent or Significant Disability/Incapacity (SDISAB), Is Life Threatening (SLIFE), Results in Death (SDTH), and Occurred with Overdose (SOD).

5.0 SUBMISSION OF IMMUNOGENICITY DATA FOR VACCINE TRIALS

Data related to the assessment of immunogenicity should be reported in the Immunogenicity Specimen (IS) domain. The LB domain should not be used for immunogenicity data.

6.0 SUBMISSION OF DATA FOR MATERNAL IMMUNIZATION TRIALS

The relationship between the mother and child should be represented in Relationship of Study Subjects (RELSUB). To allow for the possibility that a mother is treated before the number of fetuses is known, fetuses are given a Unique Subject Identifier (USUBJID) value that appends an A or B to the mother's USUBJID.

In the DM domain, the informed consent and vaccination administration date for the fetus are the same as for the mother. The age of enrollment will be a negative number in weeks. The birth date for the infant should be reported, using the variable Date/Time of Birth (BRTHDTC).

Since the amount of vaccine that reaches the fetus is unknown, the Dose Description (DOSTXT) variable in EX is utilized, and “Fetal Exposure” should be noted instead of populating the variable Dose (DOSE).

The reproductive findings (RP) domain should be used to report the maternal date of last menstrual period, and from this, the gestational age at exposure can be calculated.