Study Data Technical Rejection Criteria, Validation, and Self-Check Worksheet

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Agenda

- FDA Guidance and Data Standards Catalog
- Revised Technical Rejection Criteria for Study Data
- Study Data Technical Rejection Criteria Conformance Trend
- Technical Rejection Criteria Validation Process
- Typical Error Examples and Demo of the Self-Check Worksheet
- Implementation Timeline
Purpose of eCTD and Study Data Requirements
FDA Guidance and Data Standards Catalog

- Per FD&C Act Section 745A(a), drug application sponsors must use the standards defined in the FDA Data Standards Catalog starting 24 months after final guidance for a specific submission type.


- Sponsors must conform to standards in the FDA Data Standards Catalog:
  - NDA, BLA, ANDA studies that started after December 17th, 2016
  - Commercial IND studies started after December 17th, 2017

<table>
<thead>
<tr>
<th>Year</th>
<th>Event/Study Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dec. 2014</td>
<td>FDA published Study Data Guidance for Industry</td>
</tr>
<tr>
<td>2015</td>
<td></td>
</tr>
<tr>
<td>Dec. 2016</td>
<td>NDA, BLA, ANDA studies that started after Dec. 17th, 2016</td>
</tr>
<tr>
<td>Dec. 2017</td>
<td>Commercial IND studies that started after Dec. 17th, 2017 must conform to standards in the FDA Data Standard Catalog</td>
</tr>
<tr>
<td>2018</td>
<td></td>
</tr>
<tr>
<td>2019</td>
<td></td>
</tr>
</tbody>
</table>
Revised Technical Rejection Criteria for Study Data
Technical Rejection Criteria for Study Data (Revised 05/01/2018)

The FDA may refuse to file (RTF) for NDAs and BLAs, or refuse to receive (RTR) for ANDAs, an electronic submission that does not have study data in conformance to the required standards specified in the FDA Data Standards Catalog.

Technical Rejection Criteria for Study Data (Revised 01/22/2019)

FDA will not accept an electronic submission that does not have study data in compliance with the required standards specified in the FDA Data Standards Catalog.

FDA published Study Data Guidance for Industry


NDA, BLA, ANDA studies that started after Dec. 17th, 2016
Commercial IND studies that started after Dec. 17th, 2017
must conform to standards in the FDA Data Standard Catalog


• FDA published revised Technical Rejection Criteria for Study Data (Revised Jan. 2019)

FDA Monitors & Analyzes the Study Data Conformance

References:
FDA Study Data Technical Rejection Criteria (Revised May 2018); FDA Study Data Technical Rejection Criteria (Revised Jan. 2019)
## Update to SDTRC List of High Errors (Revised Jan. 2019)

<table>
<thead>
<tr>
<th>Error</th>
<th>Description (Reference to FDA Study Data Technical Rejection Criteria May 2018 version)</th>
<th>Severity Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1734</td>
<td>Trial Summary (TS) dataset must be present for each study in eCTD section 4.2 and 5.3</td>
<td>High</td>
</tr>
<tr>
<td>1736</td>
<td>Demographic dataset (DM) and the define.xml must be submitted in Module 4 for nonclinical data; DM dataset, the subject-level analysis dataset (ADSL) and define.xml must be submitted in Module 5 for clinical data</td>
<td>High</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Error</th>
<th>Description (Reference to FDA Study Data Technical Rejection Criteria Jan. 2019 version)</th>
<th>Severity Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>1734</td>
<td>Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections*</td>
<td>High</td>
</tr>
<tr>
<td>1735</td>
<td>Correct STF file-tags must be used for all standardized datasets and corresponding define.xml files in required sections*</td>
<td>High</td>
</tr>
</tbody>
</table>
| 1736  | For SEND data, a DM dataset and define xml must be submitted in required sections*  
For SDTM data, a DM dataset and define.xml must be submitted in required sections*  
For ADaM data, an ADSL dataset and define.xml must be submitted in required sections* | High           |
| 1789**| Study files must be referenced in a Study Tagging File (STF)                           | High           |

* Refer to the latest Technical Rejection Criteria for Study Data  
** From Providing Regulatory Submissions in Electronic Format – Certain Human Pharmaceutical Product Applications and Related Submissions Using the eCTD Specification, Section J: Datasets must only be provided in modules 3, 4, or 5 and not in modules 1 or 2
Overall Conformance Trend for Validation Errors 1734 & 1736

- Submissions with study data shows overall decreases in Validation Error 1734 and 1736 in all application types
- NDAs and INDs are showing the greatest improvements in conformance

Notes:
1) CY2017 analysis is conducted according to TRC (Revised May 2018)
2) CY2018 & CY2019 (Q1) analysis are conducted according to the TRC (Revised Jan. 2019)
CDER Conformance: Validation Error 1789

- ANDA, NDA, BLA, and Commercial IND Submissions were assessed for conformance to high-level error, 1789, as defined in the Technical Rejection Criteria for Study Data (Revised Jan. 2019)

<table>
<thead>
<tr>
<th>NDA</th>
<th>ANDA</th>
<th>BLA</th>
<th>Comm. IND</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>CY2018</td>
<td>CY2019 (Q1)</td>
<td>CY2018</td>
<td>CY2019 (Q1)</td>
<td>CY2018</td>
</tr>
<tr>
<td>Total Number of Submissions</td>
<td>41,077</td>
<td>11,011</td>
<td>62,695</td>
<td>14,776</td>
</tr>
<tr>
<td>Error 1789</td>
<td>43</td>
<td>11</td>
<td>225</td>
<td>53</td>
</tr>
<tr>
<td>Failure Rate (% among submissions with Study Data)</td>
<td>0.10%</td>
<td>0.10%</td>
<td>0.36%</td>
<td>0.36%</td>
</tr>
</tbody>
</table>

Notes:
1) One drug application could contain multiple submissions throughout its review life-cycle, such as original, supplements, and amendments
2) Each submission may contain more than one study
3) Analysis includes NDA, BLA, ANDA and Commercial IND submissions received by CDER between 1/1/2018 to 3/31/2019
4) Analysis is conducted according to the revised TRC

CDER Conformance: Validation Errors 1734, 1735 & 1736

- ANDA, NDA, BLA, and Commercial IND Submissions were assessed for conformance to three high-level error, 1734, 1735, & 1736, as defined in the Technical Rejection Criteria for Study Data (Revised Jan. 2019)
- Failure Rate for all applications increased 2.3% (average) between 2018 and 2019

<table>
<thead>
<tr>
<th></th>
<th>NDA</th>
<th>ANDA</th>
<th>BLA</th>
<th>Comm. IND</th>
<th>All</th>
</tr>
</thead>
<tbody>
<tr>
<td>CY2018</td>
<td>877</td>
<td>270</td>
<td>1078</td>
<td>243</td>
<td>291</td>
</tr>
<tr>
<td>CY2019 (Q1)</td>
<td>204</td>
<td>226</td>
<td>57</td>
<td>172</td>
<td>659</td>
</tr>
<tr>
<td>Total Number of Submissions with Study Data</td>
<td>215</td>
<td>71</td>
<td>689</td>
<td>181</td>
<td>134</td>
</tr>
<tr>
<td>Total Number of Submissions with Study Data in TRC Applicable Sections</td>
<td>185</td>
<td>52</td>
<td>186</td>
<td>53</td>
<td>96</td>
</tr>
<tr>
<td>Total Number Submissions with Critical Errors</td>
<td>34</td>
<td>23</td>
<td>497</td>
<td>130</td>
<td>26</td>
</tr>
<tr>
<td>Error 1734</td>
<td>16</td>
<td>3</td>
<td>88</td>
<td>21</td>
<td>18</td>
</tr>
<tr>
<td>Error 1735</td>
<td>185</td>
<td>52</td>
<td>186</td>
<td>53</td>
<td>96</td>
</tr>
<tr>
<td>Error 1736</td>
<td>34</td>
<td>23</td>
<td>497</td>
<td>130</td>
<td>26</td>
</tr>
<tr>
<td>Failure Rate (% among submissions with Study Data)</td>
<td>24.50%</td>
<td>63.90%</td>
<td>73.70%</td>
<td>18.60%</td>
<td>19.50%</td>
</tr>
<tr>
<td>Failure Rate (% among submissions with Study Data in TRC Applicable Sections)</td>
<td>34.80%</td>
<td>80.10%</td>
<td>26.30%</td>
<td>24.40%</td>
<td>46.90%</td>
</tr>
</tbody>
</table>

Notes:
1) One drug application could contain multiple submissions throughout its review life-cycle, such as original, supplements, and amendments
2) Analysis includes NDA, BLA, ANDA and Commercial IND submissions received by CDER between 1/1/2018 to 3/31/2019
3) Submission with multiple studies can report both Errors 1734, 1735 and 1736
4) Validation of errors 1735 and 1736 are not performed if a study has Error 1734
5) Analysis is conducted according to the revised TRC
Technical Rejection Criteria Validation Process
SDTRC High Level Validation Process (Revised Jan. 2019)

Validation Rule 1734

Validation Rule 1735

Validation Rule 1736

Validation Rule 1789
eCTD Backbone Files

- Leaf ID
- File Path
- File Name

- Leaf ID
- STF Study ID
- File-Tag

- TS Study ID
- Study Start Date
eCTD Backbone Files (index.xml)

```
<m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
  <leaf checksum-type="MD5"
    xlink:type="simple"
    checksum="98723f7594b5500a861509547c384e46" operation="new"
    application-version="PDF 1.4"
    ID="a103">
    <title>S107 ts.xpt</title>
  </leaf>
  <leaf checksum-type="MD5"
    xlink:type="simple"
    checksum="25d3b246313a9dbf688a48da2295260e" operation="new"
    version="stf version 2.2"
    ID="a104">
    <title>Study Tagging File for S107</title>
  </leaf>
</m5-3-5-1-study-reports-of-controlled-clinical-studies-pertinent-to-the-claimed-indication>
```
eCTD Backbone File (stf.xml)

- From Index.xml
  - Leaf ID
  - File Path
  - File Name

```xml
<?xml version="1.0" encoding="UTF-8"?>
<?xml-stylesheet type="text/xsl" href="../../util/style/ich-stf-stylesheet.xsl"?>
<!DOCTYPE etcd:study SYSTEM "../util/dtd/ich-stf-v2-2.dtd">
<etcd:study xmlns:etcd="http://www.ich.org/etcd" xml:lang="en" dtd-version="2.2"
xmlns:xlink="http://www.w3.org/1999/xlink">
  <study-identifier>
    <title>Wonderdrug Study S107</title>
    <study-id>S107</study-id>
    <category name="type-of-control" info-type="ich">no-treatment</category>
  </study-identifier>
  <study-document>
    <doc-content xlink:href="../index.xml#a103">
      <file-tag name="data-tabulation-dataset-sdtm" info-type="ich"/>
    </doc-content>
  </study-document>
</etcd:study>
```

- STF STUDY ID: `<study-id>S107</study-id>`
- Index.xml LEAF ID: `<file-tag name="data-tabulation-dataset-sdtm" info-type="ich"/>`
- FILE TAG ASSOCIATED TO STUDY DOCUMENT: `<doc-content xlink:href="../index.xml#a103"/>`
eCTD Backbone Files (ts.xpt)

- From Index.xml
  - Leaf ID
  - File Path
  - File Name

- From STF.xml
  - Leaf ID
  - STF Study ID
  - File-Tag

![Diagram of ts.xpt file with examples of TS Study ID and Study Start Date]
Typical Error Examples and Demo of the Self-Check Worksheet
**Self-Check Worksheet**

<table>
<thead>
<tr>
<th>Section</th>
<th>Contents</th>
</tr>
</thead>
</table>
| **1**   | **Application & Submission Information**  
  - Provides high level information about the application and submission |
| **2**   | **Study Information**  
  - Provides more detailed information about the specific study |
| **3**   | **STF File Information (1789 Validation Error)**  
  - Provide information about STF file |

Reference:
“Technical Rejection Criteria Self-Check Worksheet”  
[https://www.fda.gov/media/123098/download](https://www.fda.gov/media/123098/download)  
“Technical Rejection Criteria Self-Check Worksheet Instructions”  
[https://www.fda.gov/media/123099/download](https://www.fda.gov/media/123099/download)
## Self-Check Worksheet (1734 Validation Error)

<table>
<thead>
<tr>
<th>Section</th>
<th>Contents</th>
</tr>
</thead>
<tbody>
<tr>
<td>4</td>
<td><strong>TS File Information</strong> (1734 Validation Error)</td>
</tr>
<tr>
<td></td>
<td>• Provide information about ts.xpt file with study start date</td>
</tr>
</tbody>
</table>

### Section 4: TS File Information

<table>
<thead>
<tr>
<th>Study Start Date</th>
<th>Application Type</th>
<th>Data Type</th>
<th>Study Section</th>
<th>Required TS File Type (by Center)</th>
<th>Required TS File Type (by Center)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to or on 17-Dec-10</td>
<td>NDA, BLA, or ANDA</td>
<td>Nonclinical</td>
<td>4.2.3.1, 4.2.3.2, 4.2.3.3, 4.2.3.4</td>
<td>Simplified TS</td>
<td>Not Required</td>
</tr>
<tr>
<td>Prior to or on 17-Dec-10</td>
<td>NDA, BLA, or ANDA</td>
<td>Clinical</td>
<td>5.3.1.1, 5.3.1.2, 5.3.1.3, 5.3.1.4, 5.3.1.5, 5.3.1.6, 5.3.1.7, 5.3.1.8, 5.3.1.9</td>
<td>Simplified TS</td>
<td>Simplified TS</td>
</tr>
<tr>
<td>Prior to or on 17-Dec-17</td>
<td>Commercial IND</td>
<td>Nonclinical</td>
<td>4.2.3.1, 4.2.3.2, 4.2.3.3, 4.2.3.4</td>
<td>Simplified TS</td>
<td>Not Required</td>
</tr>
<tr>
<td>Prior to or on 17-Dec-17</td>
<td>Commercial IND</td>
<td>Clinical</td>
<td>5.3.1.1, 5.3.1.2, 5.3.1.3, 5.3.1.4, 5.3.1.5, 5.3.1.6, 5.3.1.7, 5.3.1.8, 5.3.1.9</td>
<td>Not Required</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-10</td>
<td>NDA, BLA, or ANDA</td>
<td>Nonclinical</td>
<td>4.2.3.1, 4.2.3.2, 4.2.3.3, 4.2.3.4</td>
<td>Full TS</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-10</td>
<td>NDA, BLA, or ANDA</td>
<td>Clinical</td>
<td>5.3.1.1, 5.3.1.2, 5.3.1.3, 5.3.1.4, 5.3.1.5, 5.3.1.6, 5.3.1.7, 5.3.1.8, 5.3.1.9</td>
<td>Full TS</td>
<td>Full TS</td>
</tr>
<tr>
<td>After 17-Dec-17</td>
<td>Commercial IND</td>
<td>Nonclinical</td>
<td>4.2.3.1, 4.2.3.2, 4.2.3.3, 4.2.3.4</td>
<td>Full TS</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-17</td>
<td>Commercial IND</td>
<td>Clinical</td>
<td>5.3.1.1, 5.3.1.2, 5.3.1.3, 5.3.1.4, 5.3.1.5, 5.3.1.6, 5.3.1.7, 5.3.1.8, 5.3.1.9</td>
<td>Not Required</td>
<td>Not Required</td>
</tr>
</tbody>
</table>

If you answered "Not Required" in Field 4a, then Validation Rules 1724, 1726, and 1736 do not apply. Do not proceed.

4b. Is TS File Included?*  
[ ] Yes  [ ] No

References:  
“Technical Rejection Criteria Self-Check Worksheet”  
https://www.fda.gov/media/123098/download  
“Technical Rejection Criteria Self-Check Worksheet Instructions”  
https://www.fda.gov/media/123099/download
A dataset named ts.xpt with information on Study Start Date (SSD) must be present for each study.

Common error reason across all application types:
- A missing ts.xpt file (66% of studies with error 1734)
- A missing study start date in the ts.xpt (25% of studies with error 1734)
**Applicable Study Sections (Section 4a)**

- Technical Rejection Criteria is only applicable to Study Sections as specified in **Table 1**

**eCTD Technical Rejection Criteria for Study Data Expectation**

<table>
<thead>
<tr>
<th>Example</th>
<th>Self-Check Worksheet</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Study Files and/or datasets submitted in <strong>m5-3-5-3</strong> (TRC not applicable study section)</td>
<td></td>
</tr>
<tr>
<td><strong>TRC Requirement:</strong> No ts.xpt is needed</td>
<td></td>
</tr>
</tbody>
</table>

- **Pass**
- **No Further Validation Needed**
TRC Validation Rule 1734 (Section 4c)

- Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections

<table>
<thead>
<tr>
<th>Example</th>
<th>Self-Check Worksheet</th>
</tr>
</thead>
</table>
| 2. Study Files and/or datasets submitted in **m5-3-5-1** (TRC applicable study section) | Study Start Date: 2018-01-01  
TRC Requirement: Full TS is needed |

[Study IDs Match Requirement]

![Image of study IDs matching requirement]

Pass Rule 1734
Top Error for Rule 1734: Incorrect Study Start Date Format

- A missing study start date (TSVAL) in the ts.xpt (25% of studies with error 1734)

### Correct Study Start Date Format
- yyyy-mm-dd

### Incorrect Study Start Date Format

<table>
<thead>
<tr>
<th>Format</th>
<th>Correct Date Format</th>
</tr>
</thead>
<tbody>
<tr>
<td>yyyy-mm</td>
<td>dd-mm-yyyy</td>
</tr>
<tr>
<td>SAS Date Format</td>
<td>dd-mm-yyyy</td>
</tr>
<tr>
<td>mm/dd/yyyy</td>
<td>ddmmmyyyy</td>
</tr>
<tr>
<td>dd-mmm-yy</td>
<td>dd.mm.yyyy</td>
</tr>
<tr>
<td>yyyy</td>
<td>month-yyyy</td>
</tr>
<tr>
<td>mm/dd/yy</td>
<td></td>
</tr>
</tbody>
</table>
TRC Validation Rule 1734 (Section 4c)

- Trial Summary (TS) dataset (ts.xpt) with information on study start date must be present for required sections

2. Study Files and/or datasets submitted in **m5-3-5-1** (TRC applicable study section)

**Study Start Date:** 2018-01-01

**TRC Requirement:** Full TS is needed

[Study Date Format Requirement]
- yyyy-mm-dd

![TS.XPT](image)

Pass Rule 1734
Self-Check Worksheet (1735 & 1736 Validation Error)

Section 5: Standardized Datasets (SEND, SDTM, ADaM)

5a. Are Standardized Datasets Required?*

<table>
<thead>
<tr>
<th>Study Start Date</th>
<th>Application Type</th>
<th>Standardized Datasets Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to or on 17-Dec-16</td>
<td>NDA, BLA, or ANDA</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-16</td>
<td>NDA, BLA, or ANDA</td>
<td>Required</td>
</tr>
<tr>
<td>Prior to or on 17-Dec-17</td>
<td>Commercial IND</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-17</td>
<td>Commercial IND</td>
<td>Required</td>
</tr>
</tbody>
</table>

*If you answered “No” in Field 5a, standardized datasets are not required and Validation Rules 1735 and 1736 do not apply. Do not proceed.

Fields 5b-5e are applicable to nonclinical tabulation datasets (SEND); Fields 5f-5i are applicable to clinical tabulation datasets (SDTM), and Fields 5j-5m are applicable to clinical analysis datasets (ADaM).

Note: For clinical data in Commercial INDs standardized datasets are required if the study start date is after the date stated; however, clinical data technical rejection criteria will not be applicable until further notice.

Clinical (5n)

Tabulation (SDTM datasets)

5l. Is DM File Included?**
   □ Yes □ No

5g. Is Define File Included?**
   □ Yes □ No

5h. Are the STF File-Tag for the SDTM Datasets "data-tabulation-dataset-sdtm"?
   □ Yes □ No

5i. Is the STF FIle-Tag for the Define File "data-tabulation-data-definition"?
   □ Yes □ No

Analysis (ADaM datasets)

5j. Is ADSL File Included?*
   □ Yes □ No

5k. Is Define File Included?*
   □ Yes □ No

Reference:
“Technical Rejection Criteria Self-Check Worksheet”
https://www.fda.gov/media/123098/download
“Technical Rejection Criteria Self-Check Worksheet Instructions”
https://www.fda.gov/media/123099/download
The correct STF file tags must be used for all standardized datasets and corresponding define.xml files.

Common error reason for ANDAs:
- an incorrect file tag for a define.xml file (42% of ANDA studies with error 1735)

Common error reason for NDAs:
- a dataset tagged as legacy when standardized datasets are required (80% of NDA studies with error 1735)
For SEND data, a DM dataset and define.xml must be submitted
For SDTM data, a DM dataset and define.xml must be submitted
For ADaM data, an ADSL dataset and define.xml must be submitted

Common reason across all application types:
  - a missing define.xml file (39% of studies)
  - a missing define.xml, dm.xpt, and adsl.xpt files (31% of studies)

Common error reason for NDAs:
  - missing define.xml and adsl.xpt files
TRC Validation Rule 1735 and 1736 (Section 5f-5g)

- Rule 1735: Correct STF file-tags must be used for all standardized datasets and corresponding define.xml files in required sections
- Rule 1736: For SEND data, a DM dataset and define.xml must be submitted in required sections
  - For SDTM data, a DM dataset and define.xml must be submitted in required sections
  - For ADaM data, an ADSL dataset and define.xml must be submitted in required sections

---

**Example**

Study Files and/or datasets submitted in m5-3-5-1 (clinical)
**Study Start Date:** 2018-01-01
**Dataset Type:** Tabulation (SDTM)

**Files Referenced in stf.xml**
- acr.pdf
- ds.xpt
- mh.xpt
- suppda.xpt
- suppmh.xpt
- tv.xpt
- ae.xpt
- dv.xpt
- pe.xpt
- suppdma.xpt
- sx.xpt
- vs.xpt
- cm.xpt
- eg.xpt
- sc.xpt
- suppsdm.xpt
- tx.xpt
- co.xpt
- ex.xpt
- se.xpt
- suppseg.xpt
- te.xpt
- csdq.pdf
- ix.xpt
- suppea.xpt
- supplex.xpt
- ti.xpt

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**Self-Check Worksheet**

<table>
<thead>
<tr>
<th>Section 5: Standardized Datasets (SEND, SDTM, ADaM)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Study Start Date</td>
</tr>
<tr>
<td>Prior to or on 17-Dec-16</td>
</tr>
<tr>
<td>After 17-Dec-16</td>
</tr>
<tr>
<td>Prior to or on 17-Dec-17</td>
</tr>
<tr>
<td>After 17-Dec-17</td>
</tr>
</tbody>
</table>

**Tabulation (SDTM datasets)**
- Si. Is DM File Included?*
  - Yes
  - No
- 5g. Is Define File Included?*
  - Yes
  - No

If you answered “No” in Fields 5f or 5g, Validation Rule 1736 FAILS. Proceed to Fields Sh and Si for Validation Rule 1735.

---

**Fail Rule 1736**

*dm.xpt and define.xml are missing*
Example

Study Files and/or datasets submitted in m5-3-5-1 (clinical)

Study Start Date: 2018-01-01

Dataset Type: Tabulation (SDTM)

The dataset files referenced in the stf.xml file include:
- acrf.pdf
- cm.xpt
- define.xml
- define2-0-0.xml
- dm.pdf
- cscrg.pdf

The `define.xml` file is tagged as "data-tabulation-data-definition"

Pass Rule 1735

Self-Check Worksheet

Section 5: Standardized Datasets (SEND, SDTM, ADaM)

<table>
<thead>
<tr>
<th>Study Start Date</th>
<th>Application Type</th>
<th>Standardized Datasets Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prior to 17-Dec-16</td>
<td>NDA, BLA, or ANDA</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-16</td>
<td>NDA, BLA, or ANDA</td>
<td>Required</td>
</tr>
<tr>
<td>Prior to 17-Dec-17</td>
<td>Commercial IND</td>
<td>Not Required</td>
</tr>
<tr>
<td>After 17-Dec-17</td>
<td>Commercial IND</td>
<td>Required</td>
</tr>
</tbody>
</table>

If you answered "No" in Fields 5f or 5g, Validation Rule 1736 FAILS. Proceed to Fields 5h and 5i for Validation Rule 1735.

5h. Are the STF File-Tags for the SDTM Datasets "data-tabulation-data-definition"?
- Yes
- No

5i. Is the STF File-Tag for the Define File "data-tabulation-data-definition"?
- Yes
- No

If you answered "No" in Fields 5h or 5i, Validation Rule 1735 FAILS.
Published SDTRC and Self-Check Worksheet

“Technical Rejection Criteria for Study Data”
https://www.fda.gov/media/100743/download

“Technical Rejection Criteria Self-Check Worksheet”
https://www.fda.gov/media/123098/download

“Technical Rejection Criteria Self-Check Worksheet Instructions”
https://www.fda.gov/media/123099/download

- FDA published Study Data Guidance for Industry
- NDA, BLA, ANDA studies that started after Dec. 17th, 2016
- Commercial IND studies that started after Dec. 17th, 2017 must conform to standards in the FDA Data Standard Catalog


Implementation Timeline
Implementation Timeline

FDA published Revised Study Data Technical Rejection Criteria (Revised Jan. 2019) and Study Data Self-Check Worksheet to assist sponsors with the TRC Conformance

  - FDA issued Study Data Self-Check Worksheet & Instruction

- **Mid to Late 2019**: FDA will give the industry 90 days’ notice on the eCTD website prior to the criteria becoming effective


- **Dec. 2017**: FDA issued “Providing Regulatory Submissions in Electronic Format - Standardized Study Data: Guidance for Industry”


*Note: When a submission is technically-rejected, the submission sequence is not transferred into the FDA electronic document rooms*
Reference

- “Providing Regulatory Submissions In Electronic Format - Standardized Study Data: Guidance For Industry”

- “Providing Regulatory Submissions In Electronic Format - Submissions Under Section 745a(a) Of The FD&C Act: Guidance For Industry”

- “Technical Rejection Criteria For Study Data”
  https://www.fda.gov/media/100743/download

- “Study Data Technical Conformance Guide”
  https://www.fda.gov/media/88173/download

- “FDA Data Standards Catalog”
  https://www.fda.gov/ForIndustry/DataStandards/StudyDataStandards/default.htm

- “Technical Denunciation Criteria Self-Check Worksheet”
  https://www.fda.gov/media/123098/download

- “Technical Rejection Criteria Self-Check Worksheet Instructions”

- For FDA instruction of Study Data submission, see the FDA “Study Data for Submission to CDER and CBER”
  https://www.fda.gov/industry/study-data-standards-resources/study-data-submission-cder-and-cber

- For the full list of Study Data standards, see the FDA “Study Data Standards Resources”
  http://www.fda.gov/ForIndustry/DataStandards/StudyDataStandards
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