



BIOMARKER QUALIFICATION SUBMISSION CHECKLIST

Stage 1: Initiation—Letter of Intent to Propose Biomarker Qualification

- Introduction
- Proposed context of use (COU)
- Data overview describing the proposed COU and drug development applicability
- Additional resources such as retrospective and/or prospective data
- Plans to submit qualification submission to any other regulatory agencies
- Process-related questions to FDA
- General purpose of use in drug development

Stage 2: Consultation and Advice—Briefing Document

- Introduction
 - Summary of the proposed context for intended use of the biomarker(s)
 - Strengths and limitations of the proposed biomarker(s)
 - If a composite biomarker is proposed, identify each of the component markers and the mathematical algorithm through which these composites markers are selected.
 - Objective and design of the studies supporting the use of the biomarker(s), study comparators, and sample size
 - Identification of unresolved issues and plans to resolve them, if applicable
- Context of use (COU)
 - Identification of the biomarker(s) and the species and population for which the biomarker(s) is to be qualified
 - Explicit decision-tree diagram that identifies how the biomarker(s) will be used for each COU
- Methodologies
 - Physical devices, specialized software, key operating characteristics of the measurement system, and general availability of the components
 - Information regarding analytical validation of the assay(s) used
- Results
 - Summary of existing nonclinical or clinical studies, including integrated analysis of the biomarker qualification study results as available and individual study synopses
- Critical gaps in existing knowledge and development plan for qualification to address the limitations
- Specific questions the submitter has for the Center for Drug Evaluation and Research (CDER)
- List of references and copies of a few of the key references



Stage 3: Review—Full Qualification Package

- Overview of the qualification application
- Proposed context of use (COU)
 - COU statement
 - Disease area/organ toxicity
 - Targeted population
 - Importance of the specified biomarker(s) as a drug development tool
- Background
 - Background for the disease and/or organ toxicity
 - Supportive nonclinical and clinical studies
 - Additional evidence from published literature
- Methodologies
 - Performance characteristics and methodologies of the analytically validated biomarker assays used
 - Imaging modalities
 - Charts, graphs, plots, flowcharts, etc., as applicable
 - Data collection and analysis methodologies such as analysis endpoint(s), baseline data, missing data, and sensitivity analysis
 - Statistical Analysis Plan
 - Codes, such as SAS codes, used in data analyses
- Results
 - Raw data from clinical/nonclinical studies, protocols, testing conditions, populations tested, and outcomes
 - All data sources, datasets (exploratory, confirmatory, etc.), and database(s)
 - Report that combines results from all studies, analyses (statistical and modeling), and conclusions
- Conclusion
 - Summary of key findings from all studies conducted and discussion of how the key findings support the use of the proposed biomarker(s) as a drug development tool
- Appendices
 - Any supporting material, such as references, peer-reviewed literature, and summaries or statements from other regulatory agencies, academia, consortia, and/or medical boards that may highlight the use of the biomarker(s)