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# **M4E(R2): The CTD — Efficacy Guidance for Industry**

**U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Center for Biologics Evaluation and Research (CBER)**

**July 2017  
ICH**

**Revision 1**

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# M4E(R2): The CTD — Efficacy

## Guidance for Industry

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## **M4E(R2): The CTD — Efficacy Guidance for Industry<sup>1</sup>**

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 office responsible for this guidance as listed on the title page.

### **INTRODUCTION**

This is one in a series of guidances that provide recommendations for applicants preparing the Common Technical Document for the Registration of Pharmaceuticals for Human Use (CTD) for submission to the U.S. Food and Drug Administration (FDA or Agency). A common format for technical documentation significantly reduces the time and resources needed to compile applications for registration of human pharmaceuticals by eliminating the need for applicants to reformat data and information for submission to multiple regulatory authorities. This harmonization facilitates regulatory reviews, efficient communication between regulators and applicants, as well as the efficient exchange of information between regulatory authorities.

Through the International Council for Harmonization (ICH) process, considerable harmonization has been achieved among the major pharmaceutical regulatory regions in the technical requirements for the registration of pharmaceuticals for human use. The assembly of Quality, Safety, and Efficacy information in the CTD format is either required or strongly recommended by the regulatory members of ICH (i.e., the European Commission; the Ministry of Health, Labor, and Welfare of Japan as represented by the Pharmaceuticals and Medical Devices Agency; the U.S. FDA; Health Canada; Swissmedic; Brazil's Agência Nacional de Vigilância Sanitária; and the Ministry of Food and Drug Safety in South Korea). This guidance presents the agreed-upon common format that will be accepted in the ICH regulatory regions for the preparation of a well-structured Efficacy section of the CTD.

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<sup>1</sup> This guidance was developed within the Expert Working Group (Efficacy) of the International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH) (formerly the International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use), and has been subject to consultation by the regulatory parties, in accordance with the ICH process. This document was endorsed by the ICH Steering Committee at *Step 4* of the ICH process on June 15, 2016. At *Step 4* of the process, the final draft is recommended for adoption to the regulatory authorities represented at ICH.

## ***Contains Nonbinding Recommendations***

For information on the Quality and Safety sections of the CTD, refer to the individual guidances for industry that discuss those parts of the CTD. For general information about the CTD, as well as specific information about Module 1 (regional administrative information), see the Agency's guidance for industry *Submitting Marketing Applications According to the ICH/CTD Format: General Considerations* (General Considerations guidance).<sup>2</sup> The CTD guidances are intended to be used together with other ICH and Agency guidances. Please refer to those guidances for detailed information about the contents of an application.

In general, FDA's guidance documents do not establish legally enforceable responsibilities. Instead, guidances describe the Agency'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 Agency guidances means that something is suggested or recommended, but not required.

## **BACKGROUND**

### **Preparing and Organizing the CTD**

This guidance primarily addresses the organization of the information to be presented in the Efficacy section of an application for new pharmaceuticals (including biotechnology-derived products). Guidances also are available that discuss the Quality and Safety sections of the CTD. These guidances are not intended to indicate what studies are required. The guidances merely indicate an appropriate *format* for the data that have been acquired. Applicants should not modify the overall organization of the CTD. However, in the Nonclinical and Clinical Summaries sections of the CTD, applicants can modify individual formats, if needed, to provide the best possible presentation of the technical information to facilitate the understanding and evaluation of the results.

Throughout the CTD, the display of information should be unambiguous and transparent, to facilitate the review of the basic data and to help a reviewer become quickly oriented to the application contents. Text and tables should be prepared using margins that allow the document to be printed on both A4 paper (E.U. and Japan) and 8.5 x 11" paper (U.S.). The left-hand margin should be sufficiently large that information is not obscured through binding. Font sizes for text and tables should be of a style and size that are large enough to be easily legible, even after photocopying. Times New Roman, 12-point font is recommended for narrative text. Acronyms and abbreviations should be defined the first time they are used in each module. References should be cited in accordance with the current edition of the *Uniform Requirements for Manuscripts Submitted to Biomedical Journals*, International Committee of Medical Journal Editors (ICMJE).<sup>3</sup>

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<sup>2</sup> In September 2001, FDA issued a draft version of the General Considerations guidance. When final, this guidance will represent FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA Drugs guidance Web page at <http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/default.htm>.

<sup>3</sup> The first edition of the *Uniform Requirements for Manuscripts Submitted to Biomedical Journals* was conceived by the Vancouver Group and was published in 1979.

## *Contains Nonbinding Recommendations*

The CTD should be organized into five modules. Module 1 is region specific. Modules 2, 3, 4, and 5 are intended to be common for all regions. Conformance with the CTD guidances should help ensure that these four modules are provided in a format acceptable to the regulatory authorities (see the figure and overall outline on the following pages).

### **Module 1. Administrative Information and Prescribing Information**

This module should contain documents specific to each region; for example, application forms or the proposed label for use in the region. The content and format of this module can be specified by the relevant regulatory authorities. For information about this module see the General Considerations guidance.

### **Module 2. Common Technical Document Summaries**

Module 2 should begin with a general introduction to the pharmaceutical, including its pharmacologic class, mode of action, and proposed clinical use. In general, the Introduction should not exceed one page.

Module 2 should contain 7 sections in the following order:

- CTD Table of Contents
- CTD Introduction
- Quality Overall Summary
- Nonclinical Overview
- Clinical Overview
- Nonclinical Written and Tabulated Summaries
- Clinical Summary.

The individual organization of these summaries is described in three separate documents:

- *M4Q: The CTD — Quality*
- *M4S: The CTD — Safety*
- *M4E: The CTD — Efficacy.*

### **Module 3. Quality**

Information on Quality should be presented in the structured format described in the guidance M4Q.

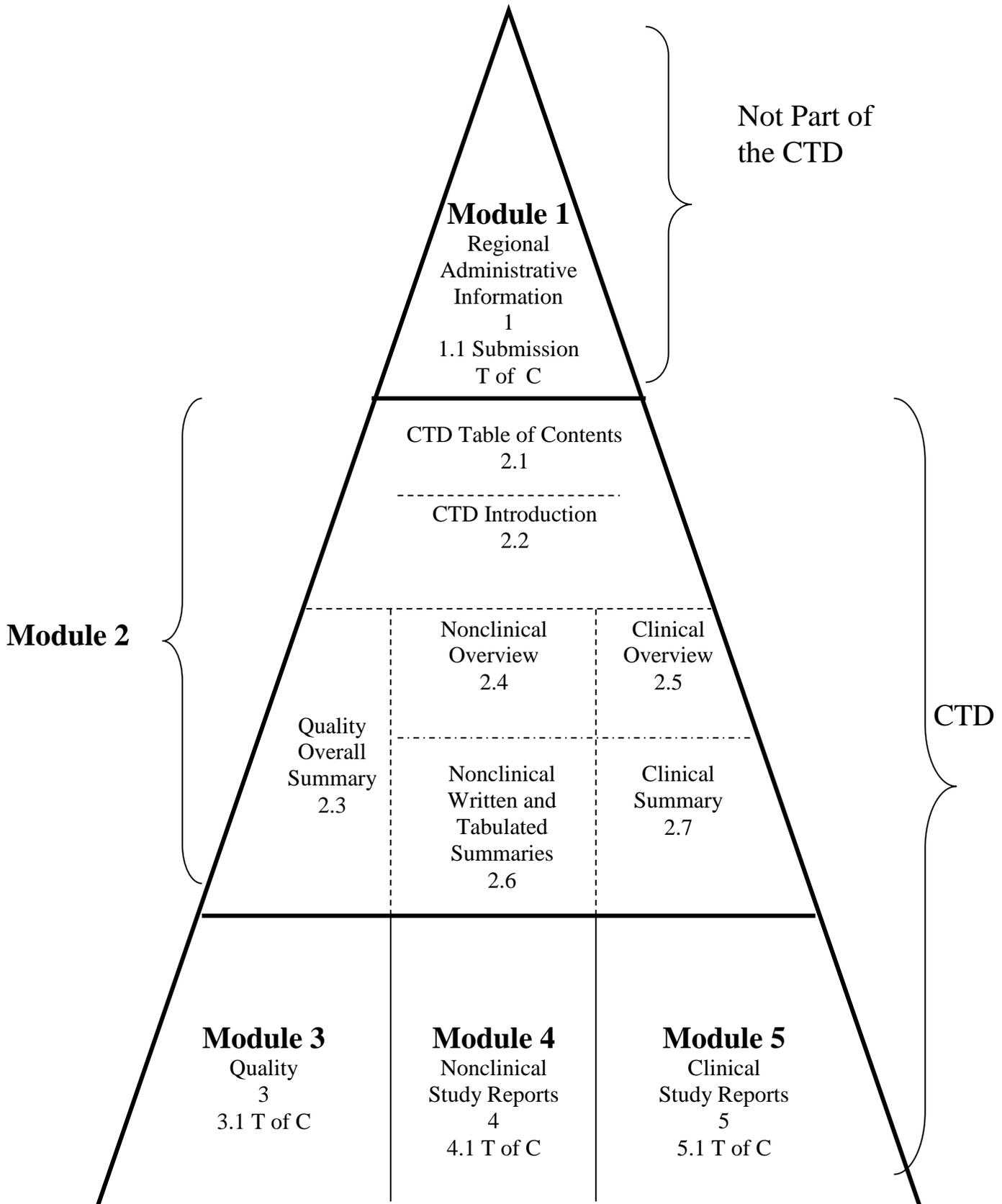
### **Module 4. Nonclinical Study Reports**

The Nonclinical Study Reports should be presented in the order described in the guidance M4S.

### **Module 5. Clinical Study Reports**

The human study reports and related information should be presented in the order described in the guidance M4E.

# Diagrammatic Representation of the ICH Common Technical Document



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The CTD should be organized according to the following general outline.

### **Module 1: Administrative Information and Prescribing Information**

- 1.1 Table of Contents of the Submission Including Module 1
- 1.2 Documents Specific to Each Region (for example, application forms, prescribing information)

### **Module 2: Common Technical Document Summaries**

- 2.1 CTD Table of Contents
- 2.2 CTD Introduction
- 2.3 Quality Overall Summary
- 2.4 Nonclinical Overview
- 2.5 Clinical Overview
- 2.6 Nonclinical Written and Tabulated Summary
  - Pharmacology
  - Pharmacokinetics
  - Toxicology
- 2.7 Clinical Summary
  - Biopharmaceutics and Associated Analytical Methods
  - Clinical Pharmacology Studies
  - Clinical Efficacy
  - Clinical Safety
  - Synopses of Individual Studies

### **Module 3: Quality**

- 3.1 Module 3 Table of Contents
- 3.2 Body of Data
- 3.3 Literature References

### **Module 4: Nonclinical Study Reports**

- 4.1 Module 4 Table of Contents
- 4.2 Study Reports
- 4.3 Literature References

### **Module 5: Clinical Study Reports**

- 5.1 Module 5 Table of Contents
- 5.2 Tabular Listing of All Clinical Studies
- 5.3 Clinical Study Reports
- 5.4 Literature References

## *Contains Nonbinding Recommendations*

### **Organization and Format of the ICH Guidances for Industry**

Although the CTD is organized by modules, the guidances for industry that provide recommendations for applicants on preparing the CTD have been organized by topic. As a result, guidance discussing Module 2 is divided among the three guidances.

- Guidance on the Quality section of the CTD (Module 2, Quality Overall Summary (QOS), and Module 3) can be found in the guidance for industry *M4Q: The CTD — Quality*.
- Guidance on the Safety section of the CTD (Module 2, the Nonclinical Overview and the Nonclinical Written and Tabulated Summaries, and Module 4) can be found in the guidance for industry *M4S: The CTD — Safety*
- Guidance on the Efficacy section of the CTD (Module 2, the Clinical Overview and the Clinical Summary, and Module 5) can be found in the guidance for industry *M4E: The CTD — Efficacy*.

### **Numbering**

In the guidances for industry on the Quality, Safety, and Efficacy sections of the CTD, Arabic numbers have been assigned to designate those specific sections that should be included in the CTD. The Arabic numbers used in the guidances also should be used when assembling the CTD for submission. For specific information on numbering the pages and volumes of the submission, see the guidance for industry, *General Considerations for Submitting Marketing Applications According to the ICH/CTD Format*. Sections in the guidance documents that are not numbered provide guidance on how to prepare those sections. In this guidance for industry, sections that should be included in Module 2 and Module 5 of the CTD have been numbered using the Arabic numbers 2 and 5, respectively.

It is possible that information for more than one indication will be submitted. In such cases, please continue the use of Arabic numbers by repeating the specific section's numbering, making it clear that the data are for an additional indication. For example, if more than one indication is submitted, repeat section 2.7.3, including the name of the indication (e.g., 2.7.3 pneumonia, 2.7.3 URI). The same approach should be used in the Quality section of the application for additional drug substances (2.3.S) and drug products (2.3.P).

## **MODULE 2: COMMON TECHNICAL DOCUMENT SUMMARIES**

### **2.5 CLINICAL OVERVIEW**

#### **Preamble**

The Clinical Overview is intended to provide a critical analysis of the clinical data in the Common Technical Document (CTD). The Clinical Overview will necessarily refer to application data provided in the comprehensive Clinical Summary, the individual clinical study reports (ICH E3), and other relevant reports; but it should primarily present the conclusions and implications of those data and should not recapitulate them. Specifically, the Clinical Summary should provide a detailed factual summarization of the clinical information in the CTD, and the Clinical Overview should provide a succinct discussion and interpretation of these findings together with any other relevant information (e.g., pertinent animal data or product quality issues that may have clinical implications).

The Clinical Overview is primarily intended for use by regulatory agencies in the review of the clinical section of a marketing application. It should also be a useful reference to the overall clinical findings for regulatory agency staff involved in the review of other sections of the marketing application. The Clinical Overview should present the strengths and limitations of the development program and study results, analyze the benefits and risks of the medicinal product in its intended use, and describe how the study results support critical parts of the prescribing information.

To achieve these objectives, the Clinical Overview should:

- Describe and explain the overall approach to the clinical development of a medicinal product, including critical study design decisions
- Assess the quality of the design and performance of the studies and include a statement regarding good clinical practice (GCP) compliance
- Provide a brief overview of the clinical findings, including important limitations (e.g., lack of comparisons with an especially relevant active comparator; absence of information on some patient populations, on pertinent endpoints, or on use in combination therapy)
- Provide an evaluation of benefits and risks based on the conclusions of the relevant clinical studies, including interpretation of how the efficacy and safety findings support the proposed dose and target indication and an evaluation of how prescribing information and other approaches will optimize benefits and manage risks
- Address particular efficacy or safety issues encountered in development and how they have been evaluated and resolved

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- Explore unresolved issues, explain why they should not be considered barriers to approval, and describe plans to resolve them
- Explain the basis for important or unusual aspects of the prescribing information

The Clinical Overview should generally be a relatively short document (about 30 pages). The length, however, will depend on the complexity of the application. The use of graphs and concise tables in the body of the text is encouraged for brevity and to facilitate understanding. It is not intended that material presented fully elsewhere be repeated in the Clinical Overview; cross-referencing to more detailed presentations provided in the Clinical Summary or in Module 5 is encouraged.

### **Table of Contents**

- 2.5.1 Product Development Rationale
- 2.5.2 Overview of Biopharmaceutics
- 2.5.3 Overview of Clinical Pharmacology
- 2.5.4 Overview of Efficacy
- 2.5.5 Overview of Safety
- 2.5.6 Benefits and Risks Conclusions
  - 2.5.6.1 Therapeutic Context
    - 2.5.6.1.1 Disease or Condition
    - 2.5.6.1.2 Current Therapies
  - 2.5.6.2 Benefits
  - 2.5.6.3 Risks
  - 2.5.6.4 Benefit-Risk Assessment
  - 2.5.6.5 Appendix
- 2.5.7 Literature References

## **Detailed Discussion of Content of the Clinical Overview Sections**

### **2.5.1 PRODUCT DEVELOPMENT RATIONALE**

The discussion of the rationale for the development of the medicinal product should:

- Identify the pharmacological class of the medicinal product.
- Describe the particular clinical/pathophysiological condition that the medicinal product is intended to treat, prevent, or diagnose (the targeted indication).
- Include a brief overview of the major therapies currently used in the intended population.
- Briefly summarize the scientific background that supported the investigation of the medicinal product for the indications that were studied.
- Briefly describe the clinical development program of the medicinal product, including ongoing and planned clinical studies and the basis for the decision to submit the application at this point in the program. Briefly describe plans for the use of foreign clinical data (ICH E5).
- Note and explain concordance or lack of concordance with current standard research approaches regarding the design, conduct, and analysis of the studies. Pertinent published literature should be referenced. Regulatory guidance and advice (at least from the region(s) where the Clinical Overview is being submitted) should be identified, with discussion of how that advice was implemented. Formal advice documents (e.g., official meeting minutes, official guidance, letters from regulatory authorities) should be referenced, with copies included in the references section of Module 5.

### **2.5.2 OVERVIEW OF BIOPHARMACEUTICS**

The purpose of this section is to present a critical analysis of any important issues related to bioavailability that might affect efficacy and/or safety of the to-be-marketed formulation(s) (e.g., dosage form/strength proportionality, differences between the to-be-marketed formulation and the formulation(s) used in clinical trials, and influence of food on exposure).

### **2.5.3 OVERVIEW OF CLINICAL PHARMACOLOGY**

The purpose of this section is to present a critical analysis of the pharmacokinetic (PK), pharmacodynamic (PD), and related in vitro data in the CTD. The analysis should consider all relevant data and explain why and how the data support the conclusions drawn. It should emphasize unusual results and known or potential problems, or note the lack thereof. This section should address:

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- Pharmacokinetics, e.g., comparative pharmacokinetics in healthy subjects, patients, and special populations; pharmacokinetics related to intrinsic factors (e.g., age, sex, race, renal and hepatic impairment) and to extrinsic factors (e.g., smoking, concomitant drugs, diet); rate and extent of absorption; distribution, including binding with plasma proteins; specific metabolic pathways, including effects of possible genetic polymorphism and the formation of active and inactive metabolites; excretion; time-dependent changes in pharmacokinetics; stereochemistry issues; clinically relevant PK interactions with other medicinal products or other substances
- Pharmacodynamics, e.g., information on mechanism of action, such as receptor binding; onset and/or offset of action; relationship of favorable and unfavorable PK effects to dose or plasma concentration (i.e., PK/PD relationships); PD support for the proposed dose and dosing interval; clinically relevant PD interactions with other medicinal products or substances; and possible genetic differences in response
- Interpretation of the results and implications of immunogenicity studies, clinical microbiology studies, or other drug class specific PD studies summarized in section 2.7.2.4 of the Clinical Summary

#### **2.5.4 OVERVIEW OF EFFICACY**

The purpose of this section is to present a critical analysis of the clinical data pertinent to the efficacy of the medicinal product in the intended population. The analysis should consider all relevant data, whether positive or negative, and should explain why and how the data support the proposed indication and prescribing information. Those studies deemed relevant for evaluation of efficacy should be identified, and reasons that any apparently adequate and well-controlled studies are not considered relevant should be provided. Prematurely terminated studies should be noted and their impact considered.

The following issues should generally be considered:

- Relevant features of the patient populations, including demographic features, disease stage, any other potentially important covariates, any important patient populations excluded from critical studies, and participation of children and elderly (ICH E11 and E7). Differences between the studied population(s) and the population that would be expected to receive the medicinal product after marketing should be discussed.
- Implications of the study design(s), including selection of patients, duration of studies, and choice of endpoints and control group(s). Particular attention should be given to endpoints for which there is limited experience. Use of surrogate endpoints should be justified. Validation of any scales used should be discussed.
- For noninferiority trials used to demonstrate efficacy, the evidence supporting a determination that the trial had assay sensitivity and justifying the choice of noninferiority margin (ICH E10).

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- Statistical methods and any issues that could affect the interpretation of the study results (e.g., important modifications to the study design, including endpoint assessments and planned analyses, as they were specified in the original protocol; support for any unplanned analyses; procedures for handling missing data; and corrections for multiple endpoints).
- Similarities and differences in results among studies, or in different patient subgroups within studies, and their effect on the interpretation of the efficacy data.
- Observed relationships between efficacy, dose, and dosage regimen for each indication in both the overall population and in the different patient subgroups (ICH E4).
- Support for the applicability to the new region of data generated in another region, where appropriate (ICH E5).
- For products intended for long-term use, efficacy findings pertinent to the maintenance of long-term efficacy and the establishment of long-term dosage. Development of tolerance should be considered.
- Data suggesting that treatment results can be improved through plasma concentration monitoring, if any, and documentation for an optimal plasma concentration range.
- The clinical relevance of the magnitude of the observed effects.
- If surrogate endpoints are relied on, the nature and magnitude of expected clinical benefit and the basis for these expectations.
- Efficacy in special populations. If efficacy is claimed with inadequate clinical data in the population, support should be provided for extrapolating efficacy from effects in the general population.

#### **2.5.5 OVERVIEW OF SAFETY**

The purpose of this section is to provide a concise critical analysis of the safety data, noting how results support and justify proposed prescribing information. A critical analysis of safety should consider:

- Adverse effects characteristic of the pharmacological class. Approaches taken to monitor for similar effects should be described.
- Special approaches to monitoring for particular adverse events (e.g., ophthalmic, QT interval prolongation).
- Relevant animal toxicology and product quality information. Findings that affect or could affect the evaluation of safety in clinical use should be considered.

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- The nature of the patient population and the extent of exposure, both for test drug and control treatments. Limitations of the safety database (e.g., related to inclusion/exclusion criteria and study subject demographics) should be considered, and the implications of such limitations with respect to predicting the safety of the product in the marketplace should be explicitly discussed.
- Common and nonserious adverse events, with reference to the tabular presentations of events with the test drug and with control agents in the Clinical Summary. The discussion should be brief, focusing on events of relatively high frequency, those with an incidence higher than placebo, and those that are known to occur in active controls or other members of the therapeutic class. Events that are substantially more or less common or problematic (considering the duration and degree of the observed events) with the test drug than with active controls are of particular interest.
- Serious adverse events (relevant tabulations should be cross-referenced from the Clinical Summary). This section should discuss the absolute number and frequency of serious adverse events, including deaths, and other significant adverse events (e.g., events leading to discontinuation or dose modification) and should discuss the results obtained for test drug versus control treatments. Any conclusions regarding causal relationship (or lack of this) to the product should be provided. Laboratory findings reflecting actual or possible serious medical effects should be considered.
- Similarities and differences in results among studies and their effect on the interpretation of the safety data.
- Any differences in rates of adverse events in population subgroups, such as those defined by demographic factors, weight, concomitant illness, concomitant therapy, or polymorphic metabolism.
- Relation of adverse events to dose, dose regimen, and treatment duration.
- Long-term safety (E1A).
- Methods to prevent, mitigate, or manage adverse events.
- Reactions due to overdose; the potential for dependence, rebound phenomena, and abuse, or lack of data on these issues.
- World-wide marketing experience. The following should be briefly discussed:
  - The extent of the world-wide experience
  - Any new or different safety issues identified

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- Any regulatory actions related to safety
- Support for the applicability to the new region of data generated in another region, where appropriate (ICH E5).

### **2.5.6 BENEFITS AND RISKS CONCLUSIONS**

#### **Preamble**

The purpose of this section is to provide a succinct, integrated, and clearly explained benefit-risk assessment of the medicinal product for its intended use. The benefit-risk assessment is based on a weighing of the key benefits and key risks of the medicinal product. Key benefits are favorable effects generally assessed by primary and other clinically important endpoints across the studies in a development program; key risks are unfavorable effects that are important from a clinical and/or public health perspective in terms of their frequency and/or severity. The identification of the key benefits and key risks of a product requires a critical evaluation of the entirety of the efficacy and safety information regarding the medicinal product. Not all benefits and risks will necessarily be considered key benefits and key risks. Subsequent benefit-risk assessments of approved products are the subject of the ICH E2C(R2) (Periodic Benefit-Risk Evaluation Report: PBRER) guidance, which similarly uses the concepts of key benefits and key risks.

The following points should be considered when completing this section:

- The aspects of the therapeutic context, benefits, and risks in the subsequent sections most pertinent to the benefit-risk assessment should be discussed in section 2.5.6. References to more detailed information presented elsewhere in the application should be used to avoid unnecessary repetition in this section.
- If multiple indications are proposed for the medicinal product, the applicant should consider whether to discuss them separately or together in the appropriate sections. Where indications are discussed separately, a separate section should be provided for each indication using headings (e.g., 2.5.6.1 Pneumonia and 2.5.6.1 Upper Respiratory Infection).
- In some cases, certain effects of the medicinal product may reasonably be described under either benefits or risks, but they should not be discussed as both.
- Data on benefits and risks may arise from multiple sources across different populations. Presentations of the aggregated results may be provided, if appropriate. The applicant should explain how the various data sources were handled (e.g., exclusion of particular studies, pooling strategy).
- For situations where the intended population differs from the study population (e.g., where enrichment strategies have been employed), the benefit-risk assessment should be presented for the intended population.

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- Information about the patient perspective<sup>4</sup> may be considered when describing the therapeutic context, benefits, risks, and the benefit-risk assessment.
- Applicants may, at their discretion, use summary tables or graphical displays to communicate the clinical importance of the key benefits and key risks, as well as the resulting benefit-risk assessment.

### **2.5.6.1 Therapeutic Context**

This section should briefly discuss the therapeutic context for the medicinal product. The term *therapeutic context* describes the disease or condition to be treated, the population intended to be treated, and the benefits and risks of current therapies.<sup>5</sup> Important limitations in the understanding of the condition and uncertainties in the benefits and risks of current therapies should be discussed. If differences in relevant subpopulations are known, they should be discussed. Information on the benefits and risks of the medicinal product should not be included here, but should be discussed in sections 2.5.6.2 and 2.5.6.3, respectively.

#### *2.5.6.1.1 Disease or Condition*

This section provides a description of aspects of the disease or condition that are most relevant to, or have the greatest impact on, the intended population (e.g., incidence, duration, morbidity, mortality, health-related quality of life). The discussion should focus on the aspects of the disease that would be covered by the proposed indication for the medicinal product. Societal or public health implications of the disease (e.g., impact of poor prevention and control of an infectious disease) should also be addressed where relevant.

#### *2.5.6.1.2 Current Therapies*

This section provides a description of the major therapies in the intended population (i.e., those therapies used most frequently and/or recommended in clinical guidelines) and the medical need for a new therapy in terms of efficacy, safety, tolerability, convenience, or preference, if applicable. For disease areas that are treated by different pharmacologic classes of therapies, this analysis may be simplified by grouping and providing commentary by drug class. Other interventions used for the intended population may also be discussed when their use is supported by established clinical practice or clinical guidelines. Such interventions could include medical and surgical procedures, drugs used off-label, and other nondrug interventions (e.g., diet modifications, physical therapy). Major differences in current therapies between regions may be noted. If no therapies are currently available to treat the intended

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<sup>4</sup> Patient perspective information describes the attitudes and preferences of patients with respect to the therapeutic context, benefits, and risks. Such information may be obtained directly from patients or indirectly from other stakeholders (e.g., parents and caregivers) using qualitative, quantitative, or descriptive methods. The detailed presentation of this information, if available, should be submitted in Module 5.

<sup>5</sup> For purposes of section 2.5.6, the term *therapy* encompasses both pharmacologic and nonpharmacologic interventions, as well as preventive measures and diagnostics. In addition, the terms *therapy* and *treatment* are used interchangeably.

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population, this should be stated.

### **2.5.6.2 Benefits**

This section provides a factual summary of the data on the key benefits that will be discussed in the benefit-risk assessment of the medicinal product. Benefits are the favorable effects of the medicinal product. In some cases, a benefit may be described by a combination of study endpoints (e.g., the benefit of improved asthma control described by the frequency of exacerbations and hospitalizations and the number of asthma-related deaths). If a surrogate endpoint(s) is the basis of the benefit assessment, the ability of the surrogate to predict clinical benefit and the basis for this expectation should be explained. Benefits may also include important characteristics of the medicinal product, such as convenience (e.g., a more convenient dosing regimen or route of administration) that may lead to improved patient compliance, or benefits that affect those other than the patient (e.g., population benefits of a vaccine due to herd immunity).

When **identifying** the key benefits of the medicinal product, the following characteristics should be considered:

- Clinical importance of the benefit (e.g., life-prolonging, curative, disease-modifying, symptomatic relief, improved patient compliance, functional or quality of life improvement, prevention of disease progression, prevention of infectious disease, diagnostic).
- Magnitude of the absolute difference in frequency of the effect in the study population versus the comparator(s); in some cases, also expressing the difference relative to the comparator may be informative (e.g., if the response rate is 20% in the drug group and 8% in the control group, the absolute difference is 12% (i.e., 20% minus 8%) and the relative effect is 2.5 (i.e., 20% minus 8%)).

When **describing** each key benefit, in addition to the points above, the following considerations may also be discussed:

- Time course of the key benefit (e.g., time to onset, continued effect of the product over time)
- Variability of the key benefit, taking into account relevant subpopulations such as those defined by age, sex, ethnicity, organ function, disease severity, or genetic polymorphism

This section should also include an analysis of the strengths, limitations, and uncertainties of the evidence related to each key benefit and the implications of this information. The following points may be considered, as applicable:

- Study design considerations (e.g., superiority or noninferiority comparison to active control, superiority comparison to placebo, blinding, absence of comparator)

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- Completeness of data collection and duration of follow-up
- Number of clinical studies and consistency of results across studies
- Relationship between exposure (e.g., drug levels in the blood) and benefit
- Generalizability of the clinical study result to clinical practice (e.g., clinically important differences between the study population and the intended population)
- Confidence that surrogate endpoints, if used, predict that the intended population will benefit

### **2.5.6.3 Risks**

This section provides a factual summary of the data on the key risks that will be discussed in the benefit-risk assessment of the medicinal product. Risks include adverse events and other unfavorable effects associated with the medicinal product. Risks that may be considered also include drug interactions, risks identified in the nonclinical data, risks to those other than the patient (e.g., fetus, those preparing and administering the medicinal product), and risks based on pharmacologic class or current knowledge of the product. Factors such as potential misuse, abuse, or diversion of the product may also be considered.

The key risks described in this section may not include all risks that are described elsewhere (e.g., risk management plan, prescribing information). When **identifying** the key risks of the medicinal product, the following characteristics of risks should be considered:

- Seriousness and/or severity
- Frequency
- Reversibility
- Tolerability

When **describing** each key risk, in addition to the points above, the following considerations may also be discussed:

- Frequencies should generally be presented as the absolute difference relative to the comparator (e.g., placebo, active comparator), and in the context of the background frequency in the patient population. In some cases, also expressing the difference relative to the comparator may be informative. If the frequency is 8% in the treatment group and 5% in the control group, the absolute difference is 3% (i.e., 8% minus 5%) and the relative risk is 1.6 (i.e., 8% minus 5%).
- Ability to monitor, minimize, or manage the risk.

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- Variability of the key risk, taking into account relevant subpopulations such as those defined by age, sex, ethnicity, weight, organ function, disease severity, concomitant illness, concomitant therapy, or genetic polymorphism.
- Time course of the adverse event in the study population (i.e., time to onset and resolution, whether the frequency of the event is highest when initiating the drug and subsequently decreases, is relatively constant with time, or increases with cumulative exposure).

This section should also include an analysis of the strengths, limitations, and uncertainties of the evidence related to each key risk and the implications of this information. The following points may be considered, as applicable:

- Study design considerations (e.g., comparison to active control, comparison to placebo, blinding, absence of comparator)
- Adequacy of assessment of risk (e.g., number of patients, number and design of trials, duration of exposure, frequency of monitoring)
- Investigation(s) to address safety issues identified during development (e.g., an ophthalmologic investigation conducted to address a nonclinical finding)
- Completeness of data collection and duration of follow-up
- Number of patients in relevant subpopulations treated at the intended dose
- Mechanism of action for the adverse event, if known, including nonclinical information or class effects
- Completeness of information on patient characteristics (e.g., smoking history, concomitant medication use) that may affect risk
- Consistency of results across studies
- Relationship between exposure (e.g., drug levels in the blood) and risk
- Generalizability of the clinical study results to clinical practice (e.g., clinically important differences between the study population and the intended population)

The proposed approach to managing each key risk should also be discussed, including an explanation of why the approach provides reasonable assurance that the risk can be appropriately managed. Repetition of details from the risk management plan is not necessary. In certain cases, a discussion of the overall approach to risk management may be sufficient and may be included after all key risks have been identified and described.

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### **2.5.6.4 Benefit-Risk Assessment**

This section should provide the applicant's conclusion on the benefit-risk assessment of the medicinal product in the proposed indication(s). This should begin with a succinct explanation of the reasoning and judgment used in assessing and weighing the key benefits and key risks. In addition, the applicant should explain how any uncertainties affected the interpretation of the evidence and their impact on the benefit-risk assessment.

When **describing** the benefit-risk assessment, the following additional aspects should be considered:

- The impact of the therapeutic context on the assessment, which may include information on the patient perspective if available. This discussion should consist of the following:
  - How the severity of disease and expected benefit influence the acceptability of the risks of the therapy
  - How the medicinal product addresses a medical need
- Key aspects of risk management that are important in reaching a favorable benefit-risk assessment, such as:
  - The proposed labeling
  - Whether nonresponders can be readily identified, allowing them to discontinue treatment
  - Other risk management activities, such as registries or restricted distribution systems

There are many approaches available for conducting the benefit-risk assessment. This guidance does not prescribe a specific approach. A descriptive approach that explicitly communicates the interpretation of the data and the benefit-risk assessment will generally be adequate. An applicant may choose to use methods that quantitatively express the underlying judgments and uncertainties in the assessment. Analyses that compare and/or weigh benefits and risks using the submitted evidence may be presented. However, before using any method, the applicant should consider its utility, complexity, the extent to which the method is established, and the ease of interpretation of the results. In this situation, the written summary and explanation of the conclusions should be provided in this section, but the detailed presentations of the methods and results should be appended in section 2.5.6.5. Tables or figures may be included in this section to support or provide greater clarity to key points or conclusions.

### **2.5.6.5 Appendix**

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Detailed presentation of methods and results used in the benefit-risk assessment that are summarized in section 2.5.6.4 can be provided in this section.

### **2.5.7 LITERATURE REFERENCES**

A list of references used, stated in accordance with the current edition of the *Uniform Requirements for Manuscripts Submitted to Biomedical Journals*, International Committee of Medical Journal Editors (ICMJE)<sup>6</sup> or the system used in “*Chemical Abstracts*,” should be provided. Copies of all references cited in the Clinical Overview should be provided in section 5.4 of Module 5.

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<sup>6</sup> The first edition of the Uniform Requirements for Manuscripts Submitted to Biomedical Journals was conceived by the Vancouver Group and was published in 1979.

## **2.7 CLINICAL SUMMARY**

### **Preamble**

The Clinical Summary is intended to provide a detailed, factual summarization of all of the clinical information in the Common Technical Document. This includes information provided in ICH E3 clinical study reports; information obtained from any meta-analyses or other cross-study analyses for which full reports have been included in Module 5; and postmarketing data for products that have been marketed in other regions. The comparisons and analyses of results across studies provided in this document should focus on factual observations. In contrast, the CTD Clinical Overview document should provide critical analysis of the clinical study program and its results, including discussion and interpretation of the clinical findings and discussion of the place of the test drug in the armamentarium.

The length of the Clinical Summary will vary substantially according to the information to be conveyed, but it is anticipated that (excluding attached tables) the Clinical Summary will usually be in the range of 50 to 400 pages.

### **Table of Contents**

We recommend that the Clinical Summary section contain a table of contents as shown here.

- 2.7.1 SUMMARY OF BIOPHARMACEUTIC STUDIES AND ASSOCIATED ANALYTICAL METHODS
  - 2.7.1.1 Background and Overview
  - 2.7.1.2 Summary of Results of Individual Studies
  - 2.7.1.3 Comparison and Analyses of Results Across Studies
  - 2.7.1.4 Appendix
- 2.7.2 SUMMARY OF CLINICAL PHARMACOLOGY STUDIES
  - 2.7.2.1 Background and Overview
  - 2.7.2.2 Summary of Results of Individual Studies
  - 2.7.2.3 Comparison and Analyses of Results Across Studies
  - 2.7.2.4 Special Studies
  - 2.7.2.5 Appendix
- 2.7.3 SUMMARY OF CLINICAL EFFICACY
  - 2.7.3.1 Background and Overview of Clinical Efficacy
  - 2.7.3.2 Summary of Results of Individual Studies
  - 2.7.3.3 Comparison and Analyses of Results Across Studies
  - 2.7.3.4 Analysis of Clinical Information Relevant to Dosing Recommendations
  - 2.7.3.5 Persistence of Efficacy and/or Tolerance Effects
  - 2.7.3.6 Appendix
- 2.7.4 SUMMARY OF CLINICAL SAFETY
  - 2.7.4.1 Exposure to the Drug
  - 2.7.4.2 Adverse Events
  - 2.7.4.3 Clinical Laboratory Evaluations
  - 2.7.4.4 Vital Signs, Physical Findings, and Other Observations Related to Safety

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- 2.7.4.5 Safety in Special Groups and Situations
- 2.7.4.6 Postmarketing Data
- 2.7.4.7 Appendix
- 2.7.5 LITERATURE REFERENCES
- 2.7.6 SYNOPSES OF INDIVIDUAL STUDIES

### **Detailed Guidance on Sections of the Clinical Summary**

## **2.7 CLINICAL SUMMARY**

### **2.7.1 SUMMARY OF BIOPHARMACEUTIC STUDIES AND ASSOCIATED ANALYTICAL METHODS**

#### **2.7.1.1 Background and Overview**

This section should provide the reviewer with an overall view of the formulation development process, the in vitro and in vivo dosage form performance, and the general approach and rationale used in developing the bioavailability, comparative bioavailability, bioequivalence, and in vitro dissolution profile database. Reference should be made to any guidance or literature used in planning and conducting the studies. This section should also provide the reviewer with an overview of the analytical methods used, with emphasis on the performance characteristics of assay validation (e.g., linearity range, sensitivity, specificity) and quality control (e.g., accuracy and precision). This section should not include detailed information about individual studies.

#### **2.7.1.2 Summary of Results of Individual Studies**

A tabular listing of all biopharmaceutic studies should generally be provided (see section 2.7.1.4 Appendix), together with narrative descriptions of relevant features and outcomes of each of the individual studies that provided important in vitro or in vivo data and information relevant to bioavailability and bioequivalence. The narrative descriptions should be brief (e.g., similar to an abstract for a journal article) and should describe critical design features and critical results. Similar studies may be described together, noting the individual study results and any important differences among the studies. These narratives may be abstracted from the ICH E3 synopsis. References or electronic links to the full report of each study should be included in the narratives.

#### **2.7.1.3 Comparison and Analyses of Results Across Studies**

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This section should provide a factual summary of all in vitro dissolution, bioavailability, and comparative bioavailability (BA) studies carried out with the drug substance or drug product, with particular attention to differences in results across studies. This overview should typically summarize the findings in text and tables (see section 2.7.1.4 Appendix) and should consider the following:

- Evidence of the effects of formulation and manufacturing changes on in vitro dissolution and bioavailability and conclusions regarding bioequivalence. When manufacturing or formulation changes are made for products containing complex drug substances (e.g., a protein), PK studies comparing the product before and after the changes may be performed to ensure that the PK characteristics have not changed as a result of product changes. Although such studies are sometimes referred to as bioequivalence (BE) studies, they generally do not focus on assessing release of drug substance from drug product. Nonetheless, such studies should be reported in this section. Note also that PK studies alone may not be sufficient to ensure similarity between such drug products. In many situations, PD studies or clinical trials may be recommended. Additionally, depending on the circumstances, antigenicity data may also be needed. Results of these other types of studies should be reported in the appropriate places in the application.
- Evidence of the extent of food effects on bioavailability and conclusions regarding bioequivalence with respect to meal type or timing of the meal (where appropriate).
- Evidence of correlations between in vitro dissolution and bioavailability, including the effects of pH on dissolution, and conclusions regarding dissolution specifications.
- Comparative bioavailability, including BE conclusions, for different dosage form strengths.
- Comparative bioavailability of the clinical study formulations (for clinical studies providing substantial evidence of efficacy) and the formulations to be marketed.
- The source and magnitude of observed inter- and intrasubject variability for each formulation in a comparative BA study.

### **2.7.1.4 Appendix**

Tables and figures should be embedded in the text of the appropriate sections when they enhance the readability of the document. Lengthy tables can be provided in the appendix at the end of the section.

Tables 2.7.1.1 and 2.7.1.2 are provided as examples of tabular formats for reporting information and results related to bioavailability and in vitro dissolution studies respectively. These examples give results as well as identify the type and design of the study. Tables prepared for reporting the results of BE studies can also include the mean ratios (test/reference) for maximum concentration (C<sub>max</sub>) and area under the curve (AUC) and their 90 percent confidence interval or the currently recommended metrics for BE assessments.

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These tables are not intended to be templates; they illustrate the type of information that should be considered by an applicant in designing the tables for biopharmaceutical studies. Applicants should also decide whether information and results from these studies are best presented in tables, text, or figures to aid clarity. If, for example, results are best presented in text and figures, tables may be used simply to list the studies.

### **2.7.2 SUMMARY OF CLINICAL PHARMACOLOGY STUDIES**

#### **2.7.2.1 Background and Overview**

This section should provide the reviewer with an overall view of the clinical pharmacology studies. These studies include clinical studies performed to evaluate human pharmacokinetics and pharmacodynamics and in vitro studies performed with human cells, tissues, or related materials (hereinafter referred to as *human biomaterials*) that are pertinent to PK processes. For vaccine products, this section should provide the reviewer with immune response data that support the selection of dose, dosage schedule, and formulation of the final product. Where appropriate, relevant data that are summarized in sections 2.7.1, 2.7.3, and 2.7.4 can also be referenced to provide a comprehensive view of the approach and rationale for the development of the PK, PD, PK/PD, and human biomaterial database. This section should not include detailed information about individual studies.

This section should begin with a brief overview of the human biomaterial studies that were conducted and that were intended to help in the interpretation of PK or PD data. Studies of permeability (e.g., intestinal absorption, blood brain barrier passage), protein binding, hepatic metabolism, and metabolic-based drug-drug interactions are particularly relevant. This should be followed by a brief overview of the clinical studies that were carried out to characterize PK and PD of the medicinal product, including studies of PK/PD relationships in healthy subjects and patients and relevant effects of intrinsic and extrinsic factors on PK and PK/PD relationships.<sup>7</sup> Critical aspects of study design and data analysis should be noted e.g., the choice of the single or multiple doses used, the study population, choice of the intrinsic or extrinsic factors that were studied, the choice of PD endpoints, and whether a traditional approach or a population approach was used to collect and analyze data to assess pharmacokinetics or pharmacodynamics.

#### **2.7.2.2 Summary of Results of Individual Studies**

A tabular listing of all clinical pharmacology studies should generally be provided (see section 2.7.2.5 Appendix), together with a narrative description of the relevant features and outcomes of each of the critical individual studies that provided in vitro or in vivo data and information relevant to PK, PD and PK/PD relationships. The narrative descriptions should be brief, e.g.,

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<sup>7</sup> In the ICH guidance *E5 Ethnic Factors in the Acceptance of Foreign Data*, factors that may result in different responses to a drug in different populations are categorized as *intrinsic ethnic factors* or *extrinsic ethnic factors*. In this guidance, these categories are referred to as *intrinsic factors* and *extrinsic factors*, respectively.

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similar to an abstract for a journal article, and should describe critical design features and critical results. Similar studies may be described together, noting the individual study results and any important differences among the studies. References or electronic links to the full report of each study should be included in the narratives.

Summaries of dose-response or concentration response (PK/PD) studies with PD endpoints should generally be included in this section. In some cases, however, when well-controlled dose-response PD or PK/PD studies provide important evidence of efficacy or safety, they should be placed in section 2.7.3 or 2.7.4 as appropriate and referenced, but not summarized, here.

#### **2.7.2.3 Comparison and Analyses of Results Across Studies**

This section should use the results of all in vitro human biomaterial studies and PK, PD, and PK/PD studies to characterize the PK, PD, and PK/PD relationships of the drug. Results related to the inter- and intraindividual variability in these data and the intrinsic and extrinsic factors affecting these PK relationships should be discussed.

This section (typically with the use of text and tables) should provide a factual presentation of all data across studies pertinent to the following:

- In vitro drug metabolism and in vitro drug-drug interaction studies and their clinical implications.
- Human PK studies, including the best estimates of standard parameters and sources of variability. The focus should be on evidence supporting dose and dose individualization in the target patient population and in special populations (e.g., pediatric or geriatric patients, patients with renal or hepatic impairment).
- Comparison between single- and repeated-dose pharmacokinetics.
- Population PK analyses, such as results based on sparse sampling across studies that address interindividual variations in the pharmacokinetics or pharmacodynamics of the active drug substances that may be due to extrinsic or intrinsic factors.
- Dose-response or concentration-response relationships. This discussion should highlight evidence to support the selection of dosages and dose intervals studied in the important clinical trials. In addition, information that supports the dosage instructions in the proposed labeling should be discussed in section 2.7.3.4.
- Major inconsistencies in the human biomaterial, PK, or PD database.
- PK studies that were performed to determine whether foreign clinical data could be extrapolated to the new region (see ICH E5). The result of the studies and analysis of the similarity of the PK data between regions or races should be summarized in this section.

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Such studies that use PD biomarkers (but do not evaluate clinical efficacy) may similarly also be summarized here. An independent subsection can be created to summarize these kinds of data.

### **2.7.2.4 Special Studies**

This section should include studies that provide special types of data relevant to specific types of medicinal products.<sup>8</sup> For immunogenicity studies and other studies in which data may correlate with PK, PD, safety, and/or efficacy data, explanations of such correlations should be summarized here. Any observed or potential effects on pharmacokinetics, pharmacodynamics, safety and/or efficacy should be considered in other appropriate sections of the Clinical Summary as well, with cross-referencing to this section. Human studies that address a specific safety issue should not be reported here, but instead should be reported in section 2.7.4, Summary of Clinical Safety.

#### **Example 1: Immunogenicity**

For protein products and other products to which specific immunological reactions have been measured, data regarding immunogenicity should be summarized in this section. For vaccines or other products intended to induce specific immune reactions, immunogenicity data should be described in the efficacy section, 2.7.3. Assays used should briefly be described and information about their performance (e.g., sensitivity, specificity, reliability, validity) should be summarized; the location of detailed information in the application should be cross-referenced.

Data regarding the incidence, titre, timing of onset, and duration of antibody responses should be summarized for each type of antibody assay used (e.g., IgG (Immunoglobulin G) by ELISA (enzyme-linked immunosorbent assay), neutralization). Relationships of antibody formation to underlying disease, concomitant medication, dose, duration, regimen, and formulation should be explored and summarized. For drugs intended to be given as chronic, continuous therapy, any data on the impact of interruptions of therapy on antigenicity should be analyzed and summarized.

It is particularly important to summarize analyses of potential clinically relevant correlates of immunogenicity (e.g., to determine the extent to which the presence of antibodies of a particular type or titer appears to correlate with alterations of pharmacokinetics, changes in pharmacodynamics, loss of efficacy, loss of adverse event profile, or development of adverse events). Particular attention should be paid to events that might be immunologically mediated (e.g., serum sickness) and events that might result from binding of cross-reactive endogenous substances by antibodies to the administered drug.

#### **Example 2: Clinical microbiology**

For antimicrobial or antiviral medicinal products, in vitro studies to characterize the spectrum of activity are an important part of the program of studies relevant to clinical efficacy. Clinical

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<sup>8</sup> The reports of these studies should be filed in Module 5, section 5.3.5.4.

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efficacy studies that include characterization of the susceptibility of the clinical isolates as a part of the efficacy determination should be included in section 2.7.3, Summary of Clinical Efficacy. However, studies that evaluate such findings as the pattern of in vitro susceptibility of strains of bacteria from different parts of the world (not in the context of clinical efficacy study) would be included here.

### **2.7.2.5 Appendix**

Tables and figures should be embedded in the text of the appropriate sections when they enhance the readability of the document. Lengthy tables can be provided in the appendix at the end of the section.

Table 2.7.2.1 is provided as an example of a tabular format for reporting information and results related to PK drug-drug interaction studies. Similar tables can be prepared for PK/PD studies, dose-response studies, studies of effects on human biomaterials, and population PK studies. This table is not intended to be a template; it illustrates the type of information that should be considered by sponsors in designing their own tables. Applicants should also decide whether information and results from clinical pharmacology studies are best presented in tables, text, or figures to aid clarity. If, for example, results are best presented in text and figures, the tables may simply list the studies.

In designing tables, if any, for various types of other clinical pharmacology studies, such as those listed below, applicants should consider including the following types of information. These examples are for illustrative purposes only, and the sponsor should decide which information to present.

- **Metabolism studies using human biomaterials:** Biomaterials used (e.g., microsomes, hepatocytes), probe drugs, enzymatic pathways and percentage of contribution, and relevant kinetic parameters (e.g.,  $V_{max}$  (maximal velocity),  $K_m$  (Michaelis Constant))
- **In vitro studies of drug-drug interactions using human biomaterials:**
  - For studies of other drugs inhibiting the new drug, the metabolite(s) inhibited, enzymatic pathways affected, range of inhibitor concentrations used,  $IC_{50}$  and  $K_i$  values and proposed mechanism of inhibition should be included.
  - For studies of the new drug inhibiting other drugs, the drugs and metabolites inhibited should be included, along with the information mentioned above.
- **Population PK studies:** Covariates studied, number and type of subjects or patients studied, summary statistical parameters, and final estimates of mean ( $\pm$  standard deviation) PK parameters

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### **2.7.3 SUMMARY OF CLINICAL EFFICACY**

A separate section 2.7.3 should be provided for each indication, although closely related indications can be considered together. When more than one section 2.7.3 is submitted, the sections should be labeled by indication (e.g., 2.7.3 pneumonia, 2.7.3 URI).

#### **2.7.3.1 Background and Overview of Clinical Efficacy**

This section should describe the program of controlled studies and other pertinent studies in the application that evaluated efficacy specific to the indications sought. Any results of these studies that are pertinent to evaluation of safety should be discussed in section 2.7.4, Summary of Clinical Safety.

The section should begin with a brief overview of the design of the controlled studies that were conducted to evaluate efficacy. These studies include dose-response, comparative efficacy, long-term efficacy, and efficacy studies in population subsets. Critical features of study design should be discussed, e.g., randomization, blinding, choices of control treatment, choice of patient population, unusual design features such as crossover or randomized withdrawal designs, use of run-in periods, other methods of *enrichment*, study endpoints, study duration, and prespecified plans for analysis of the study results. Although this section is intended to focus on clinical investigations, nonclinical data and clinical pharmacology data may also be referenced as appropriate to provide a comprehensive summary of human experience related to efficacy. This section should not include detailed information about individual studies.

#### **2.7.3.2 Summary of Results of Individual Studies**

A tabular listing of all studies that provided (or were designed to provide) information relevant to product efficacy should generally be provided (see section 2.7.3.6 Appendix), together with narrative descriptions for important studies. The narrative descriptions should be brief, e.g., similar to an abstract for a journal article and should describe critical design features and critical results. Similar studies may be described together, noting the individual study results and any important differences among the studies. For studies that also contributed significantly to the safety analysis, study narratives should include information about the extent of exposure of study subjects to the test drug or control agent and how safety data were collected. These narratives can be abstracted from the synopses of the clinical study reports (ICH E3). References or electronic links to the full report of each study should be included in the narratives.

Narratives of any bridging studies using clinical endpoints (i.e., certain studies intended to evaluate the ability to extrapolate certain types of foreign clinical data to the new region (see ICH E5)) should be included in this section. An analysis of the results of such studies, together with other information (e.g., PK and PD data) that addresses the ability to extrapolate the efficacy and safety results of foreign studies, should be performed if necessary. The conclusions of such an analysis should be noted at the start of section 2.7.3.3.2, Comparison of Efficacy Results of All Studies, and the full report of the analysis should be provided in Module 5.

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### **2.7.3.3 Comparison and Analyses of Results Across Studies**

Using text, figures, and tables as appropriate (see section 2.7.3.6 Appendix), the subsections of 2.7.3.3 should summarize all available data that characterize the efficacy of the drug. This summary should include analyses of all data, irrespective of their support for the overall conclusion and should, therefore, discuss the extent to which the results of the relevant studies do or do not reinforce each other. Any major inconsistencies in the data regarding efficacy should be addressed, and any areas needing further exploration should be identified.

The section will generally use two kinds of analyses: comparison of results of individual studies and analysis of data combined from various studies. Details of analyses that are too extensive to be reported in a summary document should be presented in a separate report to be placed in Module 5, section 5.3.5.3.

This section should also cross-reference important evidence from section 2.7.2, such as data that support the dosage and administration section of the labeling. These data include dosage and dose interval recommended, evidence pertinent to individualization of dosage and need for modifications of dosage for specific subgroups (e.g., pediatric or geriatric subjects, subjects with hepatic or renal impairment), and data relevant to dose-response or concentration response (PK/PD) relationships.

#### *2.7.3.3.1 Study Populations*

The demographic and other baseline characteristics of patients across all efficacy studies should be described. The following information should be included:

- The characteristics of the disease (e.g., severity, duration), prior treatment in the study subjects, and study inclusion/exclusion criteria.
- Differences in baseline characteristics of the study populations in different studies or groups of studies.
- Any differences between populations included in critical efficacy analyses and the overall patient population that would be expected to receive the drug when it is marketed should be noted.
- Assessment of the number of patients who dropped out of the studies, time of withdrawal (a defined study day or visit during treatment or follow up period), and reasons for discontinuation.

Tabular presentations that combine and compare study populations across studies may be useful.

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### *2.7.3.3.2 Comparison of Efficacy Results of all Studies*

The results of any bridging studies using clinical endpoints, i.e., certain studies used to evaluate the ability to extrapolate certain types of foreign clinical data to the new region (see ICH E5) should be summarized in this section. An analysis of the similarity of efficacy in subjects between regions, as well as any other information that may support extrapolation of the efficacy data to the new region, should be summarized here. An independent subsection can be created to summarize these kinds of data.

The results from all studies designed to evaluate the drug's efficacy should be summarized and compared, including studies with inconclusive or negative results. Important differences in study design (such as endpoints, control group, study duration, statistical methods, patient population, and dose) should be identified.

Comparisons of results across studies should focus on prespecified primary endpoints. However, when the primary endpoints involved different variables or time points in different efficacy studies, it may be useful to provide cross-study comparisons of important data elements that were obtained in all studies. If results over time are important, results of studies may be displayed in a figure that illustrates the change over time in each study.

Confidence intervals for treatment effects should be given to aid the interpretation of point estimates. If differences are shown between placebo and test drugs in the change from baseline, the baseline values and the magnitude of effect in all treatment groups, including placebo and active controls (if used), should generally be presented in the table or in text accompanying a figure. If the objective of an active control trial was to show equivalence or noninferiority, the difference or the ratio of outcomes between treatments should be given with the confidence interval. The results should be evaluated by using the predefined criteria for defining equivalence or noninferiority and the rationale for the criteria, and support for the determination that the study (studies) had assay sensitivity should be provided (see ICH E10).

Important differences in outcomes between studies with a similar design should be delineated and discussed. Cross-study comparisons of factors that may have contributed to differences in outcomes should be described.

If a meta-analysis of the clinical studies is performed, it should be clear whether this analysis is conducted according to a predefined protocol or is a post hoc exercise. Any differences in trial designs or populations, or in efficacy measurements between trials, should be described to allow assessment of the relevance and validity of the results and conclusions (see ICH E9). A detailed description of the methodology and results of the meta-analysis should generally be submitted in a separate report (section 5.3.5.3 of Module 5).

### *2.7.3.3.3 Comparison of Results in Subpopulations*

The results of individual studies or overview analyses of efficacy in specific populations should be summarized in this section. The purpose of these comparisons should be to show whether the claimed treatment effects are observed consistently across all relevant subpopulations, especially

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those where there are special reasons for concern. The comparisons may highlight apparent variations in efficacy that require further investigation and discussion. The limitations of such analyses, however, should be recognized (ICH E9), and it is important to note that their purpose is not to provide the basis for specific claims or to attempt to improve the evidence of efficacy in situations where the overall results are disappointing.

Given the limited sample sizes in individual studies, analyses across multiple studies should be performed to evaluate effects of major demographic factors (age, sex, and race) and of other predefined or relevant intrinsic and extrinsic factors (e.g., disease severity, prior treatment, concomitant illness, concomitant drugs, alcohol, tobacco, and body weight) on efficacy. Factors of special interest may arise from general concerns (e.g., the elderly) or from specific issues that are related to the pharmacology of the drug or that have arisen during earlier drug development. Efficacy in the pediatric population should be routinely analyzed in applications for a proposed indication that occurs in children. Depending on the data set, if extensive, detailed efficacy analyses are performed, they can be placed in Module 5, with the results of those analyses reported here.

#### **2.7.3.4 Analysis of Clinical Information Relevant to Dosing Recommendations**

This section should provide an integrated summary and analysis of all data that pertain to the dose-response or blood level-response relationships of effectiveness (including dose-blood level relationships) and thus have contributed to dose selection and choice of dose interval. Relevant data from nonclinical studies may be referenced, and relevant data from pharmacokinetic studies, other clinical pharmacology studies, and controlled and uncontrolled clinical studies should be summarized to illustrate these dose-response or blood level-response relationships. For PK and PD studies from which data have been summarized in section 2.7.2.2, it may be appropriate to draw on those data in this summary while cross-referencing the summaries in section 2.7.2.2, without repeating those summaries.

While the interpretation of how these data support specific dosing recommendations should be supplied in the Clinical Overview document, the individual study results and any cross-study analyses that will be used to support the dosing recommendations (including the recommended starting and maximal doses, the method of dose titration, and any other instructions regarding individualization of dosage) should be summarized here. Any identified deviations from relatively simple dose-response or blood level-response relationships due to nonlinearity of pharmacokinetics, delayed effects, tolerance, or enzyme induction should be described.

Any evidence of differences in dose-response relationships that result from a patient's age, sex, race, disease, or other factors should be described. Any evidence of different PK or PD responses should also be discussed, or discussions in section 2.7.2 can be cross-referenced. The ways in which such differences were looked for, even if no differences were found, should be described (e.g., specific studies in subpopulations, analysis of efficacy results by subgroup, or blood level determinations of the test drug).

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### **2.7.3.5 Persistence of Efficacy and/or Tolerance Effects**

Available information on persistence of efficacy over time should be summarized. The number of patients for whom long-term efficacy data are available, and the length of exposure, should be provided. Any evidence of tolerance (loss of therapeutic effects over time) should be noted. Examination of any apparent relationships between dose changes over time and long-term efficacy may be useful.

The primary focus should be on controlled studies specifically designed to collect long-term efficacy data, and such studies should be clearly differentiated from other, less rigorous studies, such as open extension studies. This distinction also applies to specific studies designed for evaluation of tolerance and withdrawal effects. Data concerning withdrawal or rebound effects pertinent to product safety should be presented in the safety section (see section 2.7.4).

In long-term efficacy trials, the effect of premature discontinuation of therapy or switching to other therapies on the assessment of the results should be considered. These issues may also be important for short-term trials and should be addressed when discussing the results of these trials, if appropriate.

### **2.7.3.6 Appendix**

Tables and figures should be embedded in the text when they enhance the readability of the document. Lengthy tables can be provided in the appendix at the end of the section.

Tables should identify all studies pertinent to the evaluation of efficacy (including studies that were terminated or are not yet completed, studies that failed to show effectiveness for any reason, studies available only as publications, studies reported in full technical reports (ICH E3), and studies described in abbreviated reports) and should provide the most important results of those studies. Note, however, that unplanned interim analyses on ongoing studies are generally not needed or encouraged. When more than one section 2.7.3 is provided for an application with more than one indication, usually each section should have its own appendix with tables.

Illustrative tables for an antihypertensive drug are provided, but these examples will not be relevant to every application. In general, applications will require tables and/or figures that are developed specifically for the particular drug class and the studies that were carried out.

Table 2.7.3.1 Description of Clinical Efficacy and Safety Studies

Table 2.7.3.2 Results of Efficacy Studies

## **2.7.4 SUMMARY OF CLINICAL SAFETY**

This section should be a summary of data relevant to safety in the intended patient population, integrating the results of individual clinical study reports as well as other relevant reports (e.g., the integrated analyses of safety that are routinely submitted in some regions).

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The display of safety-related data can be considered at three levels (ICH E3):

- The extent of exposure (dose, duration, number of patients, type of patients) should be examined to determine the degree to which safety can be assessed from the database.
- The more common adverse events and changes in laboratory tests should be identified and classified, and their occurrence should be summarized.
- Serious adverse events (defined in ICH E2A) and other significant adverse events (defined in ICH E3) should be identified, and their occurrence should be summarized. These events should be examined for frequency over time, particularly for drugs that may be used chronically.

The safety profile of the drug, described on the basis of analysis of all clinical safety data, should be outlined in a detailed, clear, and objective manner, with use of tables and figures.

### **2.7.4.1 Exposure to the Drug**

#### *2.7.4.1.1 Overall Safety Evaluation Plan and Narratives of Safety Studies*

The overall safety evaluation plan should be described briefly, including special considerations and observations concerning the nonclinical data, any relevant pharmacological class effects, and the sources of the safety data (e.g., controlled trials, open studies). A tabular listing of all clinical studies that provided safety data, grouped appropriately, should generally be provided (see the section 2.7.4 Appendix). In addition to studies that evaluated efficacy and safety and uncontrolled studies that generate safety information, this section includes studies that consider special safety issues. Examples include studies to compare particular adverse event rates for two therapies, to assess safety in particular demographic subsets, to evaluate withdrawal or rebound phenomena, or to evaluate particular adverse events (e.g., sedation, sexual function, effects on driving, absence of a class adverse effect). Studies in indications for which approval is not being sought in the current application and ongoing studies would also be included here if they contribute to the safety analysis.

Narrative descriptions of these studies should be provided here, except that narrative descriptions for studies that contributed both efficacy and safety data should be included in section 2.7.3.2 and cross-referenced here. The narratives should provide enough detail to allow the reviewer to understand the exposure of study subjects to the test drug or control agent and how safety data were collected (including the methods used and the extent of safety monitoring of the subjects enrolled in the individual studies). If some studies are not analyzed separately but are grouped for safety analysis, that should be noted, and a single narrative description can be provided.

#### *2.7.4.1.2 Overall Extent of Exposure*

A table (see example provided in section 2.7.4.7 Appendix) and appropriate text should be generated to summarize the overall extent of drug exposure from all phases of the clinical study

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development program. The table should indicate the numbers of subjects exposed in studies of different types and at various doses, routes, and durations. If a large number of different doses and/or durations of exposure were used, these can be grouped in a manner appropriate for the drug. Thus, for any dose or range of doses, duration of exposure can be summarized by the number of subjects exposed for specific periods of time, such as 1 day or less, 2 days to 1 week, 1 week to 1 month, 1 month to 6 months, 6 months to 1 year, more than 1 year (ICH E3). In some applications, it may be important to identify diagnostic subgroups and/or groups receiving specific concomitant therapies deemed particularly relevant to safety assessment in the intended use.

The dose levels used for each subject in this presentation could be the maximum dose received by that subject, the dose with longest exposure, and/or the mean daily dose, as appropriate. In some cases, cumulative dose may be pertinent. Dosage may be given as the actual daily dose or on a milligram (mg)/kilogram (kg) or mg/m<sup>2</sup> basis, as appropriate. If available, drug concentration data (e.g., concentration at the time of an adverse event, maximum plasma concentration, area under curve) in individual subjects may be helpful for correlation with adverse events or changes in laboratory variables.

It is assumed that all subjects who were enrolled and received at least one dose of the treatment are included in the safety analysis; if that is not so, an explanation should be provided.

#### *2.7.4.1.3 Demographic and Other Characteristics of Study Population*

A summary table should provide the reader with an overview of the demographic characteristics (Table 2.7.4.2) of the population that was exposed to the therapeutic agent during its development. Choice of age ranges used should take into account considerations discussed in the ICH guidances for industry *E7 Studies in Support of Special Populations: Geriatrics* and *E11 Clinical Investigation of Medicinal Products in the Paediatric Population*. If the relative exposure of demographic groups in the controlled trials differed from overall exposure, it may be useful to provide separate tables.

In addition, one or more tables should show the relevant characteristics of the study population and the numbers of subjects with special characteristics. Such characteristics could include

- Severity of disease
- Hospitalization
- Impaired renal function
- Concomitant illnesses
- Concomitant use of particular medications
- Geographical location

If these characteristics are distributed differently in controlled trials versus the overall database, it will generally be useful to present tables on both groupings.

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The text accompanying the tables should mention any imbalance(s) between the drug and placebo and/or comparator regarding any of the above demographic characteristics, particularly if the imbalance(s) could lead to differences in safety outcomes.

If certain subjects were excluded from studies (concomitant illness, severity of illness, concomitant medications), this fact should be noted.

Separate demographic tables should be provided for every indication, although closely related indications can be considered together if study subject characteristics are such that risks are believed to be the same.

### **2.7.4.2 Adverse Events**

#### *2.7.4.2.1 Analysis of Adverse Events*

Data on the frequency of adverse events should be described in text and tables. Text should appear in the appropriate subsections of section 2.7.4.2.1, and the tables that are not embedded in the text should be placed in the section 2.7.4.7 Appendix.

All adverse events occurring or worsening after treatment has begun (*treatment emergent signs and symptoms*, those adverse events not seen at baseline and those that worsened even if present at baseline) should be summarized in tables listing each event, the number of subjects in whom the event occurred and the frequency of occurrence in subjects treated with the drug under investigation, with comparator drugs, and with placebo. Such tables could also present results for each dose and could be modified to show adverse event rates by severity, by time from onset of therapy, or by assessment of causality.

When most of the relevant safety data are derived from a small number of studies (e.g., one or two studies) or when very different study subject populations were enrolled in the studies that were performed, presentation of data by study will often be appropriate. When the relevant exposure data are not concentrated in a small number of studies, however, grouping the studies and pooling the results to improve precision of estimates and sensitivity to differences should generally be considered.

While often useful, pooling of safety data across studies should be approached with caution because in some cases interpretation can be difficult, and it can obscure real differences. In cases where differences are apparent, it is more appropriate to present the data by study. The following issues should be considered:

- It is most appropriate to combine data from studies that are of similar design (e.g., similar in dose, duration, methods of determining adverse events, and population).
- If the incidence for a particular adverse event differs substantially across the individual studies in a pool, the pooled estimate is less informative.

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- Any study with an unusual adverse event pattern should be presented separately.
- The appropriate extent of analysis depends on the seriousness of the adverse event and the strength of evidence of drug causation. Differences in rates of drug-related, serious events or events leading to discontinuation or dosage change deserve more investigation, whereas rates of other adverse events do not merit elaborate analysis.
- Examination of which subjects experience extreme laboratory value abnormalities (*outliers*) may be useful in identifying subgroups of individuals who are at particular risk for certain adverse events.

Groups of studies that could be used in pooled safety analyses include the following.

- All controlled studies or subsets of controlled studies, such as all placebo-controlled studies, studies with any positive control, studies with a particular positive control, or studies of particular indications (and thus carried out in different populations). These groupings are considered the best source of information about the more common adverse events and can distinguish drug-related events from spontaneous events. Rates in control and treatment groups should be compared.
- All studies, excluding short-term studies in healthy subjects. This grouping is most useful for evaluating rarer events.
- All studies using a particular dose route or regimen, or a particular concomitant therapy.
- Studies in which adverse event reports are elicited by checklist or direct questioning, or studies in which events are volunteered.
- Pools of studies by region.

It is almost always useful to carry out the first two groupings; the others chosen would vary from drug to drug and should be influenced by inspection of individual study results. Whatever methods are used, it should be recognized that, as for results of single studies, any numerical rate is often only a rough approximation of reality.

When a decision is made to pool data from several studies, the rationale for selecting the method used for pooling should be described. It is common to combine the numerator events and the denominators for the selected studies. Other methods for pooling results across studies are available (e.g., weighting data from studies on the basis of study size or inversely to their variance).

If substantial differences are seen between clinical trials in the rates of adverse events, these differences should be noted and possible reasons should be discussed (e.g., relevant differences in study populations, in dose administration, or in methods of collecting adverse event data).

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Adverse events should be described as shown in the individual study report (ICH E3). In combining data from many studies, it is important to use standardized terms to describe events and collect synonymous terms under a single preferred term. This can be done with a standard dictionary, and the Medical Dictionary for Regulatory Activities (MedDRA) terminology (ICH M1 guidance) should be used. Until MedDRA can be fully implemented, other dictionaries can be used, but should be specified. Frequencies should be presented for preferred terms and for appropriately defined groupings. Examination of which adverse events led to change in therapy (discontinuation of drug use, change in dose, need for added therapy) can help in assessing the clinical importance of adverse events. These rates can be added to the adverse event rate tables or can be presented in separate tables. Overall discontinuation rates by study may be useful, but it is also important to specify the particular adverse events leading to discontinuation in a separate table. The preferred terms should be grouped by body system and arranged by decreasing frequency.

### 2.7.4.2.1.1 Common Adverse Events

Tabular displays of adverse event rates (see section 2.7.4.7 Appendix) should be used to compare rates in treatment and control groups. For this analysis, it may be helpful to combine the event severity categories and the causality categories, if they are used, leading to a simpler side-by-side comparison of treatment groups. It should be noted that while causality categories may be reported if used, the presentation of the data should include total adverse events that occurred (whether deemed related or unrelated to treatment); evaluations of causality are inherently subjective and may exclude unexpected adverse events that are in fact treatment related. Additionally, comparisons of rates of adverse events between treatment and control groups in individual trials should be summarized here. It is often useful to tabulate rates in selected trials (see example table 2.7.4.4, in section 2.7.4.7 Appendix).

It is usually useful to examine more closely the more common adverse events that seem to be drug related (e.g., those that show that a dose response and/or a clear difference between drug and placebo rates) for relationship to relevant factors, including:

- Dosage
- Mg/kg or mg/m<sup>2</sup> dose
- Dose regimen
- Duration of treatment
- Total dose
- Demographic characteristics such as age, sex, race
- Concomitant medication use
- Other baseline features such as renal status
- Efficacy outcomes
- Drug concentration, where available

It may also be useful to summarize the results of examination of time of onset and duration for these drug-related events.

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Rigorous statistical evaluations of the possible relationship of specific adverse events to each of the above factors are often unnecessary. It may be apparent from initial display and inspection of the data that there is no evidence of a significant relationship to demographic or other baseline features. In that case, no further analysis of these particular factors is needed. Furthermore, it is not necessary that all such analyses be presented in this report. When the safety analyses are too extensive to be presented in detail in this report, they may be presented in a separate report in Module 5, section 5.3.5.3, and summarized here.

Under certain circumstances, life table or similar analyses may be more informative than reporting of crude adverse event rates.

### 2.7.4.2.1.2 Deaths

A table in section 2.7.4.7 Appendix should list all deaths occurring while on study (including deaths that occurred shortly after treatment termination (e.g., within 30 days or as specified in the study protocol) as well as all other deaths that occurred later but may have resulted from a process that began during studies. Only deaths that are clearly disease-related per protocol definitions and not related to the investigational product, either in studies of conditions with high mortality such as advanced cancer or in studies where mortality from disease is a primary study endpoint, should be excepted from this listing (it is assumed, however, that these deaths would still be reported in the individual ICH E3 study reports). Even these deaths should be examined for any unexpected patterns between study arms and further analyzed if unexplained differences are observed. Deaths should be examined individually and analyzed on the basis of rates in individual trials and appropriate pools of trials, considering both total mortality and cause-specific deaths. Potential relationships to the factors listed in section 2.7.4.2.1.1 should also be considered. Although cause-specific mortality can be difficult to determine, some deaths are relatively easy to interpret. Thus deaths due to causes expected in the patient population (heart attacks and sudden death in an angina population) are individually not considered to be informative, but even one death due to a QT interval prolongation-associated arrhythmia, aplastic anemia, or liver injury may be informative. Special caution is appropriate before an unusual death is attributed to concomitant illness.

### 2.7.4.2.1.3 Other Serious Adverse Events

Summaries of all serious adverse events (other than death but including the serious adverse events temporally associated with or preceding the deaths) should be displayed. Serious adverse events that occurred after the drug use was discontinued should be included in this section. The display should include major laboratory abnormalities, abnormal vital signs, and abnormal physical observations that are considered serious adverse events using the ICH E2A definitions. Results of analyses or assessments of serious adverse events across studies should be presented. Serious events should be examined for frequency over time, particularly for drugs that may be used chronically. Potential relationships to the factors listed in section 2.7.4.2.1.1 should also be considered.

### 2.7.4.2.1.4 Other Significant Adverse Events

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Marked hematologic and other laboratory abnormalities (other than those meeting the definition of serious) and any events that led to a substantial intervention (premature discontinuation of study drug, dose reduction, or substantial additional concomitant therapy), other than those reported as serious adverse events, should be displayed.

Events that led to premature discontinuation of study drug represent an important safety concern and deserve particular attention in the analysis of drug safety for two reasons. First, even for expected events (based on pharmacologic activity), the discontinuation or alteration of treatment reflects the severity and perceived importance of the event to patient and physician. Second, discontinuation may represent a drug-related event not yet recognized as drug related. Adverse events leading to treatment discontinuation should be considered possibly drug-related even if this was not recognized initially and even if the event was thought to represent intercurrent illness. Reasons for premature treatment discontinuations should be discussed and rates of discontinuations should be compared across studies and compared with rates of discontinuations for placebo and/or active control treatment. In addition, the study data should be examined for any potential relationships to the factors listed in section 2.7.4.2.1.1.

### 2.7.4.2.1.5 Analysis of Adverse Events by Organ System or Syndrome

Assessment of the causality of, and risk factors for, deaths, other serious events, and other significant events is often complicated by the fact that these events are uncommon. As a result, consideration of related events as a group, including less important events of potentially related pathophysiology, may be of critical value in understanding the safety profile. For example, the relationship to treatment of an isolated sudden death may become much clearer when considered in the context of cases of syncope, palpitations, and asymptomatic arrhythmias.

Thus it is generally useful to summarize adverse events by organ system so that they may be considered in the context of potentially related events including laboratory abnormalities. Such presentations of adverse events by organ system should be placed in subsections of section 2.7.4.2.1.5, labeled 2.7.4.2.1.5.1, 2.7.4.2.1.5.2, and titled by the organ system under consideration. The list of organ systems to be addressed and the approach to grouping certain events should be selected as appropriate to best present the adverse event data for the medicinal product. If some adverse events tend to occur in syndromes (e.g., influenza-like syndrome, cytokine release syndrome), the sponsor may choose to create some subsections of 2.7.4.2.1.5 for syndromes rather than organ systems.

The same data and summarizations should generally not be repeated in more than one subsection of section 2.7.4.2.1. Instead, a summary presentation may be placed in one subsection and cross-referenced as appropriate in others.

### 2.7.4.2.2 Narratives

The locations in the application of individual narratives of patient deaths, other serious adverse events, and other significant adverse events deemed to be of special interest because of clinical importance (as described in ICH E3 individual study reports) should be referenced here for the

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convenience of the reviewer. The narratives themselves should be a part of the individual study reports, if there is such a report. In cases where there is no individual study report (e.g., if many open studies are pooled as part of a safety analysis and are not individually described), narratives can be placed in Module 5, section 5.3.5.3. Narratives should not be included here unless an abbreviated narrative of particular events is considered critical to the summary assessment of the drug.

### **2.7.4.3 Clinical Laboratory Evaluations**

This section should describe changes in patterns of laboratory tests with drug use. Marked laboratory abnormalities and those that led to a substantial intervention should be reported in section 2.7.4.2.1.3 or 2.7.4.2.1.4. If these data are also presented in this section, this duplicate reporting should be made clear for the reviewer. The appropriate evaluations of laboratory values will in part be determined by the results seen, but, in general, the analyses described below should be provided. For each analysis, comparison of the treatment and control groups should be carried out as appropriate and should be compatible with study sizes. In addition, normal laboratory ranges should be given for each analysis (ICH E3). Where possible, laboratory values should be provided in standard international units.

A brief overview of the major changes in laboratory values across clinical studies should be provided. Laboratory data should include hematology, clinical chemistry, urinalysis, and other data as appropriate. Each parameter at each time over the course of the study (e.g., at each visit) should be described at the following three levels:

- The central tendency (i.e., the group mean and median values)
- The range of values and the number of subjects with abnormal values or with abnormal values of a certain size (e.g., twice the upper limit of normal, five times the upper limit; choices should be explained). When data are pooled from centers with differences in normal laboratory ranges, the methodology used in pooling should be described. The analysis of individual subject changes by treatment group can be shown with a variety of approaches (e.g., shift tables, see ICH E3 for examples).
- Individual clinically important abnormalities, including those leading to discontinuations. The significance of laboratory changes and the likely relation to the treatment should be assessed (e.g., by analysis of such features as relationship to dose, relationship to drug concentration, disappearance on continued therapy, positive dechallenge, positive rechallenge, and the nature of concomitant therapy). Potential relationships to other factors listed in section 2.7.4.2.1.1 should also be considered.

### **2.7.4.4 Vital Signs, Physical Findings, and Other Observations Related to Safety**

The manner of presenting cross-study observations and comparisons of vital signs (e.g., heart rate, blood pressure, temperature, respiratory rate), weight, and other data (e.g., electrocardiograms, X-rays) related to safety should be similar to that for laboratory variables. If

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there is evidence of a drug effect, any dose-response or drug concentration-response relationship or relationship to individual variables (e.g., disease, demographics, concomitant therapy) should be identified and the clinical relevance of the observation described. Particular attention should be given to changes not evaluated as efficacy variables and to those considered to be adverse events. Particular attention should be given to studies that were designed to evaluate specific safety issues (e.g., studies of QT interval prolongation).

### **2.7.4.5 Safety in Special Groups and Situations**

#### *2.7.4.5.1 Intrinsic Factors*

This section should summarize safety data pertinent to individualizing therapy or patient management on the basis of demographic and other factors defined as ***intrinsic ethnic factors*** in ICH E5. These factors include age, sex, height, weight, lean body mass, genetic polymorphism, body composition, other illness, and organ dysfunction. Safety in the pediatric population should be routinely analyzed in applications for a proposed indication that occurs in children. Analysis of the impact of such factors on safety outcomes should have been presented in other sections but should be summarized here, together with pertinent PK or other information (e.g., in patients with renal or hepatic disease). If a sufficiently large number of subjects with a given co-morbid condition (such as hypertension, heart disease, or diabetes) was enrolled, analyses should be carried out to assess whether the co-morbid condition affected the safety of the drug under study. Cross-reference should be made to the tables or description of adverse events when analyses of such subgroups have been carried out.

#### *2.7.4.5.2 Extrinsic Factors*

This section should summarize safety data pertinent to individualizing therapy or patient management on the basis of factors defined as ***extrinsic ethnic factors*** in ICH E5. These are factors associated with the patient environment. Examples are the medical environment, use of other drugs (see section 2.7.4.5.3, Drug Interactions), use of tobacco, use of alcohol, and food habits.

For example, if a potential interaction with alcohol is suggested by the metabolic profile, by the results of studies, by postmarketing experience, or by information on similar drugs, information should be provided here.

#### *2.7.4.5.3 Drug Interactions*

Studies on potential drug-drug or drug-food interactions should be summarized in the Summary of Clinical Pharmacology Studies section of the CTD (section 2.7.2). The potential impact on safety of such interactions should be summarized here, based on PK, PD, or clinical observations. Any observed changes in the adverse event profile, changes in blood levels thought to be associated with risk, or changes in drug effects associated with other therapy should be presented here.

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### *2.7.4.5.4 Use in Pregnancy and Lactation*

Any information on safety of use during pregnancy or breast-feeding that becomes available during clinical development or from other sources should be summarized here.

### *2.7.4.5.5 Overdose*

All available clinical information relevant to overdose, including signs and/or symptoms, laboratory findings, and therapeutic measures and/or treatments and antidotes (if available), should be summarized and discussed. Information on the efficacy of specific antidotes and dialysis should be provided if available.

### *2.7.4.5.6 Drug Abuse*

Any relevant studies and information regarding the investigation of the dependence potential of a new therapeutic agent in animals and in humans should be summarized and cross-referenced to the nonclinical summary. Particularly susceptible patient populations should be identified.

### *2.7.4.5.7 Withdrawal and Rebound*

Any information or study results pertinent to rebound effects should be summarized. Events that occur, or increase in severity, after discontinuation of double-blind or active study medication should be examined to see if they are the result of withdrawal of the study medication. Particular emphasis should be given to studies designed to evaluate withdrawal and/or rebound.

Data concerning tolerance should be summarized under section 2.7.3.5 in the Summary of Clinical Efficacy.

### *2.7.4.5.8 Effects on Ability to Drive or Operate Machinery or Impairment of Mental Ability*

Safety data related to any impairment in the senses, coordination, or any other factor that would result in diminished ability to drive a vehicle or operate machinery or that would impair mental ability should be summarized. This includes relevant adverse effects reported in safety monitoring (e.g., drowsiness) and specific studies concerning effects on ability to drive or operate machinery or impairment of mental ability.

## **2.7.4.6 Postmarketing Data**

If the drug has already been marketed, all relevant postmarketing data available to the applicant (published and unpublished, including periodic safety update reports if available) should be summarized. The periodic safety update reports can be included in Module 5. Details of the number of subjects estimated to have been exposed should be provided and categorized, as appropriate, by indication, dosage, route, treatment duration, and geographic location. The

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methodology used to estimate the number of subjects exposed should be described. If estimates of the demographic details are available from any source, these should be provided.

A tabulation of serious events reported after the drug is marketed should be provided, including any potentially serious drug interactions.

Any postmarketing findings in subgroups should be described.

### **2.7.4.7 Appendix**

Tabular presentations should be provided that summarize the important results from all studies pertinent to the evaluation of safety and particularly to support product labeling.

Tables and figures should be embedded in the text of the appropriate sections when they enhance the readability of the document. Lengthy tables can be provided in the appendix at the end of the section.

A few illustrative tables are provided, but a clinical summary will routinely need tables and figures that have been developed for the particular drug, drug class, and clinical indications.

See sections 2.7.4.2.1, 2.7.4.2.2.3, and 2.7.4.3 of this guidance for additional discussion regarding the content of section 2.7.4 tables.

Table 2.7.4.1 Study Subject Drug Exposure by Mean Daily Dose and Duration of Exposure

Table 2.7.4.2 Demographic Profile of Patients in Controlled Trials

Table 2.7.4.3 Incidence of Adverse Events in Pooled Placebo and Active Controlled Trials

Table 2.7.4.4 Incidence of Adverse Events in the Largest Trials

Table 2.7.4.5 Patient Withdrawals by Study: Controlled Trials

Table 2.7.4.6 Listing of Deaths

### **2.7.5 LITERATURE REFERENCES**

A list of references cited in the Clinical Summary should be provided. Copies of all important references should be provided in Module 5, section 5.4. The reference list should indicate which references are available in Module 5, section 5.4. All references that have not been provided should be available on request.

### **2.7.6 SYNOPSES OF INDIVIDUAL STUDIES**

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ICH guidance for industry *E3 Structure and Content of Clinical Study Reports* suggests inclusion of a study synopsis with each clinical study report and provides one example of a format for such synopses.

This section should include the table entitled Listing of Clinical Studies, described in guidance for Module 5, followed by all individual study synopses organized in the same sequence as the study reports in Module 5.

It is expected that one synopsis will be prepared per study for use in all regions and that the same synopsis will be included in this section and as part of the clinical study report in Module 5. The length of a synopsis will usually be up to 3 pages, but a synopsis for a more complex and important study may be longer (e.g., 10 pages). Within the individual synopsis, tables and figures should be used as appropriate to aid clarity.

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**Table 2.7.1.1 Summary of Bioavailability Studies**

Study Ref. No.	Study Objective	Study Design	Treatments (Dose, Dosage Form, Route) [Product ID]	Subjects (No.(M/F) type Age: mean (range))	Mean Parameters (+/- SD)						Study Report Location
					Cmax (mg/L)	Tmax (hr)	AUC (mg/L x hr)	Cmin** (mg/L)	T1/2 (hr)	Other	
192 (Japan)	Pilot relative BA study comparing the absorption from a 200 mg tablet batch to a 200mg reference batch.	Open, randomized, cross-over, single 200 mg dose	200mg Tab., p.o. [17762]	20 (10/10) Healthy volunteer 27 y (20-35)	83 ± 21	1	217 ± 20		3.1		
			200mg Tab., p.o. [19426]		80 ± 32	0.5	223 ± 19		2.9		
195 (Japan)	Comparative BA study of xx under fasted and fed conditions	Open, randomized, cross-over, single dose	200mg Tab, p.o. [19426]	30 (15/15) Healthy volunteer 32 y (26-50)	83 ± 21	1	217 ± 20				
					120 ± 30	2	350 ± 40				

AUC : AUC<sub>TAU</sub> or AUC<sub>inf</sub>

Cmin : For multiple dose studies

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**Table 2.7.1.2. Summary of In Vitro Dissolution Studies**

Study Ref. No.	Product ID/Batch No.	Dosage Form	Conditions	No. of Dosage Units	Collection times Mean % Dissolved (range)	Study Report Location
1821	979-03	25 mg Cap.	Dissolution: Apparatus 2 (USP) Speed of Rotation: 50 rpm Medium/Temperature: Water 37°	12	10      20      30 (min) 42 (32-49)    71 (58-85)    99 (96-100) (%)	

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**Table 2.7.2.1 Summary of Drug-Drug Interaction PK Studies**

Study/ Protocol # (Country)	Product ID/Batch # (NME)	Study Objective	Study Design	# Subjects Entered/Com pleted (M/F)	HV/P <sup>1</sup> (Age: Mean, range)	Treatments		Mean Pharmacokinetic Parameters (%CV) Substrate Drug					Mean ratio <sup>2</sup> Confidence interval		Location
						Substrate	Interacting Drug	Cmax	Tmax	AUC	T1/2	CL/kg	Cmax	AUC	
001 (USA)	19B Batch 0034	Effect of warfarin on Drug X	Randomized, Crossover	(8M/4F)/ (7M/4F)	HV (34, 20-41)	Drug X 100 mg bid x 7d	Placebo	45 (18) Φg/mL	2.0 (30) hr	456 (24) Φg*hr/ mL	4.25 (30) hr	0.05 (20) mL/min/ kg	1.16 1.01-1.30	1.16 1.03-1.34	
						Drug X 100 mg bid x 7d	Warfarin 10 mg qd x 7d	52 (20) Φg/mL	2.1 (35) hr	530 (27) Φg*hr/ mL	4.75 (35) hr	0.04 (22) mL/min/ kg			
001 (USA)	19B batch 0034	Effect of drug X on warfarin	Randomized, Crossover	(8M/4F)/ (7M/4F)	HV (34, 20-41)	Warfarin 10 mg qd x 7d	placebo	12 (25) Φg/mL	1.5 (30) hr	60 (37) Φg*hr/ mL	40 (35) hr	0.04 (30) mL/min/ kg	1.08 0.92-1.24	1.07 0.92-1.18	
						Warfarin 10 mg qd x 7d	drug X 100 mg bid x 7d	13 (20) Φg/mL	1.45 (27) hr	64 (39) Φg*hr/ mL	42 (37) hr	0.39 (34) mL/min/ kg			
002 (UK)	19B2 Batch 0035	Effect of Cimetidine on Drug X	Crossover, Single sequence	(4M/8F)/ (4M/8F)	HV (30, 19-45)	Drug X 50 mg bid x 5d	Placebo	49 (18) Φ/mL	2.1 (30) hr	470 (24) Φg*hr/ mL	4.4 (30) hr	0.05 (20) mL/min/ kg	1.22 1.03-1.40	1.36 1.11-1.53	
						drug X 50 mg bid x 5d	Cimetidine 200 mg bid x 5d	60 (10) Φg/mL	2.2 (30) hr	640 (24) Φg*hr/ mL	5.2 (30) hr	0.03 (20) mL/min/ kg			

<sup>1</sup>HV=Healthy Volunteers, P=Patients

<sup>2</sup>Value for substrate with interacting drug / value with placebo

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**Table 2.7.3.1 Description of Clinical Efficacy and Safety Studies**

Study ID	Number of Study Centers Location(s)	Study start Enrollment status, date Total enrollment / Enrollment goal	Design Control type	Study & Ctrl Drugs Dose,Route & Regimen	Study Objective	# subs by arm entered/ compl.	Duration	Gender M/F Median Age (Range)	Diagnosis Inclusion Criteria	Primary Endpoint(s)
PG-2476	1  U. Antarctica	Aug-94  Completed Apr 98  50 / 50	Randomized, double blind, parallel  Placebo	TP: 30 mg po bid  Pbo	Efficacy and Safety	27/24  23/21	4 weeks	27/23  38 (20-64)	Mild hypertension  Diastolic 90-100 Systolic 150-170	Change from baseline systolic and diastolic pressure at 4 weeks.
PG-2666	4  Affiliated Physicians of Florida,  Smith & Jones CRO	May-98  Ongoing as of May 2001  126/400	Randomized, open label, parallel  Placebo and Dose-response	TP: 100 mg po bid  TP: 50 mg po bid  TP: 25 mg po bid  Placebo	Efficacy and Safety,  Long-term efficacy and safety	34/30  30/28  34/32  28/26	4 weeks, followed by 12 weeks open-label	66/60  55 (24-68)	Mild hypertension Systolic 150-170  Diastolic 90-100	Change from baseline systolic and diastolic pressure at 4 weeks and at 12 weeks.

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**Table 2.7.3.2 Results of Efficacy Studies**

Study	Treatment Arm	# Enrolled/ Completed	Mean systolic and diastolic BP			Primary Endpoint Placebo- subtracted change in DBP at 40 weeks	Statistical test / P value	Secondary Endpoints % normalized** (ITT analysis)	Other Comments
			Baseline	20 wks	40 wks				
PG- 2678	TP: 100 mg po bid	34/30	162/96	140/85	138/84	6	88		
	TP: 50 mg po bid	30/28	165/97	146/87	146/87	4	78		
	TP: 25 mg po bid	34/32	167/96	148/88	148/88	2	50		
	TP: 10 mg po bid	26/20	162/95	153/93	153/93	-4	20		
	Placebo	28/26	166/97	160/92	159/91		30		

\*\*Provide definition

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**Table 2.7.4.1 Study Subject Drug Exposure by Mean Daily Dose and Duration of Exposure**  
**Intravenous formulation**                      **N=**                      **Cutoff Date:**

Duration (Weeks)	Mean Daily Dose (mg)							Total (Any Dose)	Percent
	0 < Dose ≤ 5mg	5 < Dose ≤ 10mg	10 < Dose ≤ 20mg	20 < Dose ≤ 30mg	30 < Dose ≤ 50mg	50mg < Dose			
0 < Dur ≤ 1									
1 < Dur ≤ 2									
2 < Dur ≤ 4									
4 < Dur ≤ 12									
12 < Dur ≤ 24									
24 < Dur ≤ 48									
48 < Dur ≤ 96									
Dur >96									
<b>Total (Any Duration)</b>									
<b>Percent</b>									

Similar tables can be generated for median, for modal, and for maximum dose, or for dose of longest exposure. The same table can be generated for any pool of studies and any subgroup of interest (e.g., on the basis of age groupings, sex, ethnic factors, comorbid conditions, concomitant medications, or any combination of these factors).

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Dose can also be expressed as mg/kg, mg/m<sup>2</sup>, or in terms of plasma concentration if such data are available.

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**Table 2.7.4.2 Demographic Profile of Patients in Controlled Trials Cutoff Date:**

	<b>Treatment Groups</b>		
	<b>Test Product</b> N =	<b>Placebo</b> N =	<b>Active Control</b> N =
Age (years)			
Mean ± SD	50 ± 15		
Range	20-85		
Groups			
<18	N (%)	N (%)	N (%)
18 - 40	N (%)	N (%)	N (%)
40 - 64	N (%)	N (%)	N (%)
65 - 75	N (%)	N (%)	N (%)
>75	N (%)	N (%)	N (%)
Sex			
Female	N (%)	N (%)	N (%)
Male	N (%)	N (%)	N (%)
Race			
Asian	N (%)	N (%)	N (%)
Black	N (%)	N (%)	N (%)
Caucasian	N (%)	N (%)	N (%)
Other	N (%)	N (%)	N (%)
Other Factors			

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**Table 2.7.4.3 Incidence of Adverse Events in Pooled Placebo and Active Controlled Trial Database**

Body System / Adverse Event	Test Drug			Placebo n = 425	Active Control 1 20 mg n = 653	Active Control 2	
	All doses n = 1685	10 mg n = 968	20 mg n = 717			50 mg n = 334	100 mg n = 546
Body as a whole							
Dizziness	19 (1%)	7 (1%)	12 (2%)	6 (1%)	23 (4%)	1 (<1%)	3 (1%)
Etc.							
Cardiovascular							
Postural Hypotension	15 (1%)	10 (1%)	5 (1%)	2 (<1%)	7 (1%)	6 (2%)	12 (2%)
Etc.							
Gastrointestinal							
Constipation							

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**Table 2.7.4.4 Incidence of Adverse Events in Individual Studies**

Body System / Adverse Event	Reported Incidence by Treatment Groups							
	Study 95-0403			Study 96-0011		Study 97-0007		Study 98-0102s
	Drug x 60 mg bid N =104	Drug x 30 mg bid N =102	Placebo N = 100	Drug x 60 mg bid N = 500	Placebo N=495	Drug x 60 mg bid N=200	Drug y 100 mg qd N=200	Drug x 60 mg bid N=800
Body as a whole								
Dizziness	N (%)	N (%)	N (%)	N (%)	N (%)	N (%)	N (%)	N (%)
Etc.	N (%)	N (%)	N (%)	N (%)	N (%)	N (%)	N (%)	N (%)
Cardiovascular								
Postural Hypotension								
Etc.								
Gastrointestinal								
Constipation								

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**Table 2.7.4.5 Patient Withdrawals<sup>4</sup> by Study: Controlled Trials**

**Cutoff Date:**

Studies		Total Withdrawal				Reason for Withdrawal			Number Without Postwithdrawal Efficacy Data	
		Total	Male/ Female	Age > 65	Race (identify groupings) ///	Adverse Events N (%)	Lack of Efficacy N (%)	Other N (%)	N	(%)
Study XXX	Drug X	N (%)	N (%) / N (%)	N (%)	N (%) / N (%) / N (%)					
	Placebo									
Study AAA	Drug X									
	Comparator A									
Study BBB	Drug X									
	Comparator B									
Study CCC	Drug X									
	Comparator C									

Note: withdrawal data can be subdivided by dose level, if that appears to be useful.

<sup>4</sup> Withdrawals are all subjects who were enrolled but did not complete the planned course of treatment (includes subjects who discontinued treatment or changed to a different treatment prematurely and/or were lost to follow up).

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**Table 2.7.4.6 Listing of Deaths**

					<b>Treatment:</b>		<b>Test Product:</b>		<b>Cutoff Date:</b>		
Trial / Source <sup>1</sup>	Center	Patient ID	Age (yrs)	Sex	Dose (mg)	Duration of Exposure (Days)	Diagnosis	Cause of Death	Other Medications	Other Medical Conditions	Location of Narrative Description

<sup>1</sup>PM = deaths from postmarketing experience

This listing should include all deaths meeting the inclusion rule, whether arising from a clinical trial or from any secondary source (e.g., postmarketing experience). In electronic applications, a link to the narrative or other documentation regarding the event should be provided.

A footnote should describe the rule for including deaths in the table (e.g., all deaths that occurred during a period of drug exposure or within a period of up to 30 days following discontinuation from drug and also those occurring later but resulting from adverse events that had an onset during exposure or during the 30-day follow up period). Other rules may be equally appropriate.

Similar lists should be provided for patients exposed to placebo and active control drugs.

## **MODULE 5: CLINICAL STUDY REPORTS**

### **Preamble**

Through the ICH process, a guidance has been published on the structure and content of clinical study reports (ICH E3). This document provides guidance on the organization of these study reports, other clinical data, and references within a Common Technical Document (CTD) for registration of a pharmaceutical product for human use. These elements should facilitate the preparation and review of a marketing application.

This guidance is not intended to indicate what studies are required for successful registration. It indicates an appropriate organization for the clinical study reports that are in the application.

### **Detailed Organization of Clinical Study Reports and Related Information in Module 5**

This guidance recommends a specific organization for the placement of clinical study reports and related information to simplify preparation and review of applications and to ensure completeness. The placement of a report should be determined by the primary objective of the study. Each study report should appear in only one section. Where there are multiple objectives, the study should be cross-referenced in the various sections. An explanation such as “not applicable” or “no study conducted” should be provided when no report or information is available for a section or subsection.

- 5.1 Table of Contents of Module 5**
- 5.2 Tabular Listing of All Clinical Studies**
- 5.3 Clinical Study Reports**
  - 5.3.1 Reports of Biopharmaceutical Studies**
    - 5.3.1.1 Bioavailability (BA) Study Reports
    - 5.3.1.2 Comparative BA and Bioequivalence (BE) Study Reports
    - 5.3.1.3 In vitro-In vivo Correlation Study Reports
    - 5.3.1.4 Reports of Bioanalytical and Analytical Methods for Human Studies
  - 5.3.2 Reports of Studies Pertinent to Pharmacokinetics using Human Biomaterials**
    - 5.3.2.1 Plasma Protein Binding Study Reports
    - 5.3.2.2 Reports of Hepatic Metabolism and Drug Interaction Studies
    - 5.3.2.3 Reports of Studies Using Other Human Biomaterials
  - 5.3.3 Reports of Human Pharmacokinetic (PK) Studies**
    - 5.3.3.1 Healthy Subject PK and Initial Tolerability Study Reports

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5.3.3.2 Patient PK and Initial Tolerability Study Reports

5.3.3.3 Intrinsic Factor PK Study Reports

5.3.3.4 Extrinsic Factor PK Study Reports

5.3.3.5 Population PK Study Reports

#### **5.3.4 Reports of Human Pharmacodynamic (PD) Studies**

5.3.4.1 Healthy Subject PD and PK/PD Study Reports

5.3.4.2 Patient PD and PK/PD Study Reports

#### **5.3.5 Reports of Efficacy and Safety Studies**

5.3.5.1 Study Reports of Controlled Clinical Studies Pertinent to the Claimed Indication

5.3.5.2 Study Reports of Uncontrolled Clinical Studies

5.3.5.3 Reports of Analyses of Data from More Than One Study

5.3.5.4 Other Clinical Study Reports

#### **5.3.6 Reports of Post-Marketing Experience**

#### **5.3.7 Case Report Forms and Individual Patient Listings**

### **5.4 Literature References**

## **5.2 TABULAR LISTING OF ALL CLINICAL STUDIES**

A tabular listing of all clinical studies and related information should be provided. For each study, this tabular listing generally should include the type of information identified in Table 5.1 of this guidance. Other information can be included in this table if the applicant considers the information useful. The sequence in which the studies are listed should follow the sequence described in section 5.3 below. Use of a different sequence should be noted and explained in an introduction to the tabular listing.

## **5.3 CLINICAL STUDY REPORTS**

### **5.3.1 Reports of Biopharmaceutic Studies**

BA studies evaluate the rate and extent of release of the active substance from the medicinal product. Comparative BA or BE studies may use PK, PD, clinical, or in vitro dissolution endpoints, and may be either single dose or multiple dose. When the primary purpose of a study is to assess the PK of a drug, but also includes BA information, the study report should be submitted in section 5.3.1, and referenced in sections 5.3.1.1 and/or 5.3.1.2.

#### *5.3.1.1 Bioavailability (BA) Study Reports*

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BA studies in this section should include:

- Studies comparing the release and systemic availability of a drug substance from a solid oral dosage form to the systemic availability of the drug substance given intravenously or as an oral liquid dosage form
- Dosage form proportionality studies
- Food-effect studies

### *5.3.1.2 Comparative BA and Bioequivalence (BE) Study Reports*

Studies in this section compare the rate and extent of release of the drug substance from similar drug products (e.g., tablet to tablet, tablet to capsule). Comparative BA or BE studies may include comparisons between:

- The drug product used in clinical studies supporting effectiveness and the to-be-marketed drug product
- The drug product used in clinical studies supporting effectiveness and the drug product used in stability batches
- Similar drug products from different manufacturers

### *5.3.1.3 In Vitro – In Vivo Correlation Study Reports*

In vitro dissolution studies that provide BA information, including studies used in seeking to correlate in vitro data with in vivo correlations, should be placed in section 5.3.1.3. Reports of in vitro dissolution tests used for batch quality control and/or batch release should be placed in the Quality section of the CTD.

### *5.3.1.4 Reports of Bioanalytical and Analytical Methods for Human Studies*

Bioanalytical and/or analytical methods for biopharmaceutical studies or in vitro dissolution studies should ordinarily be provided in individual study reports. Where a method is used in multiple studies, the method and its validation should be included once in section 5.3.1.4 and referenced in the appropriate individual study reports.

## **5.3.2 Reports of Studies Pertinent to Pharmacokinetics Using Human Biomaterials**

***Human biomaterials*** is a term used to refer to proteins, cells, tissues and related materials derived from human sources that are used in vitro or ex vivo to assess PK properties of drug substances. Examples include cultured human colonic cells that are used to assess permeability through biological membranes and transport processes and human albumin that is used to assess plasma protein binding. Of particular importance is the use of human biomaterials such as hepatocytes and/or hepatic microsomes to study metabolic pathways and to assess drug-drug

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interactions with these pathways. Studies using biomaterials to address other properties (e.g., sterility or pharmacodynamics) should not be placed in the Clinical Study Reports section, but in the Nonclinical Study section (Module 4).

### ***5.3.2.1 Plasma Protein Binding Study Reports***

Ex vivo protein binding study reports should be provided here. Protein binding data from PK blood and/or plasma studies should be provided in section 5.3.3.

### ***5.3.2.2 Reports of Hepatic Metabolism and Drug Interaction Studies***

Reports of hepatic metabolism and metabolic drug interaction studies with hepatic tissue should be placed here.

### ***5.3.2.3 Reports of Studies Using Other Human Biomaterials***

Reports of studies with other biomaterials should be placed in this section.

## **5.3.3 Reports of Human Pharmacokinetic (PK) Studies**

Assessment of the pharmacokinetics of a drug in healthy subjects and/or patients is considered critical to designing dosing strategies and titration steps, to anticipating the effects of concomitant drug use, and to interpreting observed PD differences. These assessments should provide a description of the body's handling of a drug over time, focusing on maximum plasma concentrations (peak exposure), area-under-curve (total exposure), clearance, and accumulation of the parent drug and its metabolites, in particular those that have pharmacological activity.

The PK studies whose reports should be included in sections 5.3.3.1 and 5.3.3.2 are generally designed to (1) measure plasma drug and metabolite concentrations over time, (2) measure drug and metabolite concentrations in urine or feces when useful or critical, and/or (3) measure drug and metabolite binding to protein or red blood cells. On occasion, PK studies may include measurement of drug distribution into other body tissues, body organs, or fluids (e.g., synovial fluid or cerebrospinal fluid), and the results of these tissue distribution studies should be included in section 5.3.3.1 or 5.3.3.2, as appropriate. These studies should characterize the drug's PK and provide information about the absorption, distribution, metabolism, and excretion of a drug and any active metabolites in healthy subjects and/or patients. Studies of mass balance and changes in PK related to dose (e.g., determination of dose proportionality) or time (e.g., due to enzyme induction or formation of antibodies) are of particular interest and should be included in sections 5.3.3.1 and/or 5.3.3.2. Apart from describing mean PK in normal and patient volunteers, PK studies should also describe the range of individual variability. In the ICH guidance for industry *E5 Ethnic Factors in the Acceptance of Foreign Data*, factors that may result in different responses to a drug in different populations are categorized as ***intrinsic ethnic factors*** or ***extrinsic ethnic factors***. In this document, these categories are referred to as ***intrinsic factors*** and ***extrinsic factors***, respectively. Additional studies can also assess differences in systemic exposure as a result of changes in pharmacokinetics due to intrinsic (e.g., age, gender, racial, weight, height, disease, genetic polymorphism, and organ dysfunction) and extrinsic (e.g., drug-

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drug interactions, diet, smoking, and alcohol use) factors. Reports of PK studies examining the influence of intrinsic and extrinsic factors on exposure should be organized in sections 5.3.3.3 and 5.3.3.4, respectively.

In addition to standard multiple-sample PK studies, population PK analyses based on sparse sampling during clinical studies can also address questions about the contributions of intrinsic and extrinsic factors to the variability in the dose-PK-response relationship. Because the methods used in these studies are substantially different from those used in standard PK studies, population PK studies should be placed in section 5.3.3.5.

#### *5.3.3.1 Healthy Subject PK and Initial Tolerability Study Reports*

Reports of PK and initial tolerability studies in healthy subjects should be placed in this section.

#### *5.3.3.2 Patient PK and Initial Tolerability Study Reports*

Reports of PK and initial tolerability studies in patients should be placed in this section.

#### *5.3.3.3 Intrinsic Factor PK Study Reports*

Reports of PK studies to assess effects of intrinsic factors should be placed in this section.

#### *5.3.3.4 Extrinsic Factor PK Study Reports*

Reports of PK studies to assess effects of extrinsic factors should be placed in this section.

#### *5.3.3.5 Population PK Study Reports*

Reports of population PK studies based on sparse samples obtained in clinical trials including efficacy and safety trials should be placed in this section.

### **5.3.4 Reports of Human Pharmacodynamic (PD) Studies**

Reports of studies with a primary objective of determining the PD effects of a drug product in humans should be placed in this section. Reports of studies whose primary objective is to establish efficacy or to accumulate safety data, however, should be placed in section 5.3.5.

This section should include reports of (1) studies of pharmacologic properties known or thought to be related to the desired clinical effects (biomarkers), (2) short-term studies of the main clinical effect, and (3) PD studies of other properties not related to the desired clinical effect. Because a quantitative relationship of these pharmacological effects to dose and/or plasma drug and metabolite concentrations is usually of interest, PD information is frequently collected in dose-response studies or together with drug concentration information in PK studies (concentration-response or PK/PD studies). Relationships between PK and PD effects that are not obtained in well-controlled studies are often evaluated using an appropriate model and used

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as a basis for designing further dose-response studies or, in some cases, for interpreting effects of concentration differences in population subsets.

Dose-finding, PD, and/or PK-PD studies can be conducted in healthy subjects and/or patients and can also be incorporated into the studies that evaluate safety and efficacy in a clinical indication. Reports of dose-finding, PD, and/or PK/PD studies conducted in healthy subjects should be placed in section 5.3.4.1, and the reports for those studies conducted in patients should be placed in section 5.3.4.2.

In some cases, the short-term PD, dose-finding, and/or PK-PD information found in PD studies conducted in patients will provide data that contribute to assessment of efficacy, because they show an effect either on an acceptable surrogate marker (e.g., blood pressure) or on a clinical benefit endpoint (e.g., pain relief). Similarly, a PD study may contain important clinical safety information. When these studies are part of the efficacy or safety demonstration, they are considered clinical efficacy and safety studies that should be included in section 5.3.5, not in section 5.3.4.

#### ***5.3.4.1 Healthy Subject PD and PK/PD Study Reports***

PD and/or PK/PD studies having nontherapeutic objectives in healthy subjects should be placed in this section.

#### ***5.3.4.2 Patient PD and PK/PD Study Reports***

PD and/or PK/PD studies in patients should be submitted in this section.

### **5.3.5 Reports of Efficacy and Safety Studies**

This section should include reports of all clinical studies of efficacy and/or safety carried out with the drug, conducted by the sponsor or otherwise available, including all completed and all ongoing studies of the drug in proposed and nonproposed indications. The study reports should provide the level of detail appropriate to the study and its role in the application. ICH E3 describes the contents of a full report for a study contributing evidence pertinent to both safety and efficacy. Abbreviated reports can be provided for some studies (see ICH E3 and individual guidance by region).

Within section 5.3.5, studies should be organized by design (controlled, uncontrolled) and, within controlled studies, by type of control. Within each section, studies should be categorized further, ordered by whether the study report is complete or abbreviated (ICH E3), with completely reported studies presented first. Published reports with limited or no further data available to the sponsor should be placed last in this section.

In cases where the application includes multiple therapeutic indications, the reports should be organized in a separate section 5.3.5 for each indication. In such cases, if a clinical efficacy study is relevant to only one of the indications included in the application, the study should be included in the appropriate section 5.3.5; if a clinical efficacy study is relevant to multiple

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indications, the study report should be included in the most appropriate section 5 and referenced as necessary in other sections 5.3.5 (e.g., section 5.3.5A, section 5.3.5B).

### *5.3.5.1 Study Reports of Controlled Clinical Studies Pertinent to the Claimed Indication*

The controlled clinical study reports should be sequenced by type of control:

- Placebo control (could include other control groups, such as an active comparator or other doses)
- No-treatment control
- Dose-response (without placebo)
- Active control (without placebo)
- External (historical) control, regardless of the control treatment

Within each control type, where relevant to assessment of drug effect, studies should be organized by treatment duration. Studies of indications other than the one proposed in the application, but that provide support for efficacy in the proposed use, should be included in section 5.3.5.1.

Where a pharmacodynamic study contributes to evidence of efficacy, it should be included in section 5.3.5.1. The sequence in which studies were conducted is not considered pertinent to their presentation. Thus, placebo-controlled trials, whether early or late, should be placed in section 5.3.5.1. Controlled safety studies, including studies in conditions that are not the subject of the application, should also be reported in section 5.3.5.1.

### *5.3.5.2 Study Reports of Uncontrolled Clinical Studies*

Study reports of uncontrolled clinical studies (e.g., reports of open label safety studies) should be included in section 5.3.5.2. This includes studies in conditions that are not the subject of the marketing application.

### *5.3.5.3 Reports of Analyses of Data from More than One Study (Including Any Formal Integrated Analyses, Meta-Analyses, and Bridging Analyses)*

Many clinical issues in an application can be addressed by an analysis considering data from more than one study. The results of such an analysis should generally be summarized in the clinical summary documents, but a detailed description and presentation of the results of such analyses are considered critical to their interpretation. Where the details of the analysis are too extensive to be reported in a summary document, they should be presented in a separate report. Such reports should be found in section 5.3.5.3. Examples of reports that would be placed in this section include (1) a report of a formal meta-analysis or extensive exploratory analysis of efficacy to determine an overall estimate of effect size in all patients and/or in specific subpopulations and (2) a report of an integrated analysis of safety that assesses such factors as the adequacy of the safety database, estimates of event rates, and safety with respect to variables such as dose, demographics, and concomitant medications. A report of a detailed analysis of bridging, considering formal bridging studies, other relevant clinical studies, and other

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appropriate information (e.g., PK and PD information), should be placed in this section if the analysis is too lengthy for inclusion in the Clinical Summary.

#### ***5.3.5.4 Other Study Reports***

This section can include:

- Reports of interim analyses of studies pertinent to the claimed indications.
- Reports of controlled safety studies not reported elsewhere.
- Reports of controlled or uncontrolled studies not related to the claimed indication.
- Published reports of clinical experiences with the medicinal product, which are not included in section 5.3.5.1. However, when literature is important to the demonstration or substantiation of efficacy, it should be included in section 5.3.5.1.
- Reports of ongoing studies.

#### **5.3.6 Reports of Postmarketing Experience**

For products that are currently marketed, reports that summarize marketing experience (including all significant safety observations) should be included in section 5.3.6.

#### **5.3.7 Case Report Forms and Individual Patient Listings**

Case report forms and individual patient data listings that are described as appendices 16.3 and 16.4 in the ICH clinical study report guidance (E3) should be placed in this section when submitted, in the same order as the clinical study reports and indexed by study.

### **5.4 LITERATURE REFERENCES**

Copies of referenced documents, including important published articles, official meeting minutes, or other regulatory guidance or advice should be provided here. This includes copies of all references cited in the Clinical Overview and copies of important references cited in the Clinical Summary or in the individual technical reports that were provided in Module 5, section 5.3. Only one copy of each reference should be provided. Copies of references that are not included here should be available immediately on request.

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**Table 5.1. Listing of Clinical Studies**

<b>Type of Study</b>	<b>Study Identifier</b>	<b>Location of Study Report</b>	<b>Objective(s) of the Study</b>	<b>Study Design and Type of Control</b>	<b>Test Product(s); Dosage Regimen; Route of Administration</b>	<b>Number of Subjects</b>	<b>Healthy Subjects or Diagnosis of Patients</b>	<b>Duration of Treatment</b>	<b>Study Status; Type of Report</b>
BA	001	Vol 3, Sec. 1.1, p. 183	Absolute BA IV vs Tablet	Cross-over	Tablet, 50 mg single dose, oral, 10 mg IV	20	Healthy Subjects	Single dose	Complete; Abbreviated
BE	002	Vol 4, Sec. 1.2, p. 254	Compare clinical study and to-be-marketed formulation	Cross-over	Two tablet formulations, 50 mg, oral	32	Healthy Subjects	Single dose	Complete; Abbreviated
PK	1010	Vol 6, Sec. 3.3, p. 29	Define PK	Cross-over	Tablet, 50 mg single dose, oral	50	Renal Insufficiency	Single dose	Complete; Full
PD	020	Vol 6, Sec. 4.2, p. 147	Bridging study between regions	Randomized placebo-controlled	Tablet, 50 mg, multiple dose, oral, every 8 hrs	24 (12 drug, 12 placebo)	Patients with primary hypertension	2 weeks	Ongoing; Interim
Efficacy	035	Vol 10, Sec. 5.1, p. 1286	Long-term; Efficacy and Safety; Population PK analysis	Randomized active-controlled	Tablet, 50 mg, oral, every 8 hrs	300 (152 test drug, 148 active control)	Patients with primary hypertension	48 weeks	Complete; Full