

# eCTD Validation DIA EDM Philadelphia 2008

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## eCTD Validation – what exactly are we talking about?

- Gateway Validation
- ASR Validation
- eCTD Tool Validation
- Qualitative Validation



#### Validation Flow

Gateway Validation

ASR Validation

eCTD Tool Validation

Division Quality Checks



#### Gateway Validation

- Once you have established an account this is almost never an issue
- The Gateway Validation is concerned with file integrity



#### Automated Submission Receipt (ASR)

#### • ASR

- Processes your submission
- Loads the submission into CDER's tracking system
- Notifies the Regulatory Project Manager

#### To operate efficiently we need

- eCTD
- Fillable Form 1571/356h
- Accurate Information, e.g., application number



#### eCTD Tool Validation

- Identifies and rates the severity of the errors encountered
  - High Errors vs. Medium Errors vs. Low errors
- The criteria for these will be published shortly



#### Division Quality Checks

- Hyperlinks
- Datasets
- Table of Contents Issues
- Missing Files



#### The Top Ten\* Validation Issues

- Lack of 356h, 1571, or 2252
- No Fillable Forms
- More than one form in a submission

<sup>\*</sup> This one goes to eleven



### The Top Ten\* Validation Issues contd.

- Mismatched application number between the US-Regional.xml and the form
- Incorrect, missing or no application number either on the form or in the us-regional.xml
- Invalid submission identified ex. eCTD submitted as eNDA
- Bad Characters in file or folder names

<sup>\*</sup> This one goes to eleven



### The Top Ten\* Validation Issues contd.

- More than one sequence included in one gateway submission
- One submission applied to more than one application
- Single file submission Usually a single PDF file
- Mismatch between application type and form an NDA with a 1571.PDF

<sup>\*</sup> This one goes to eleven



#### Why do you care

- These errors require us to manually process your gateway submission
- Manually processed submissions delay access to your material
- More hands in the pot increases chances for error



#### How to avoid problems





#### Include a form - 356h, 1571, or 2252

- The information assists us in processing your submission
- If you are using the Gateway it is extremely helpful to have a form
- If you use the Gateway and you aren't required by regulations to send in a form – send in a form – just don't sign it



#### Use a Fillable PDF form

- Fillable forms allow us to extract the data necessary to automatically process your submission
- Using a scanned form will delay processing
- <a href="http://www.fda.gov/opacom/morechoic">http://www.fda.gov/opacom/morechoic</a> es/fdaforms/cder.htm



# One form is enough – don't send in more than one form in a submission

- Our ASR program looks for the "356h" in 356h.PDF
- 356h\_append.PDF looks like another 356h.pdf to our program.
- More than one form (real or imagined) delays processing



## PDF Form and US-Regional.XML Mismatch

- The form has your application number
- The US-Regional.XML has your application number
- They need to be the same number
- It's great to reuse XML just clean it up first





#### **Invalid submission type**

• ENDA submission going to a eCTD application





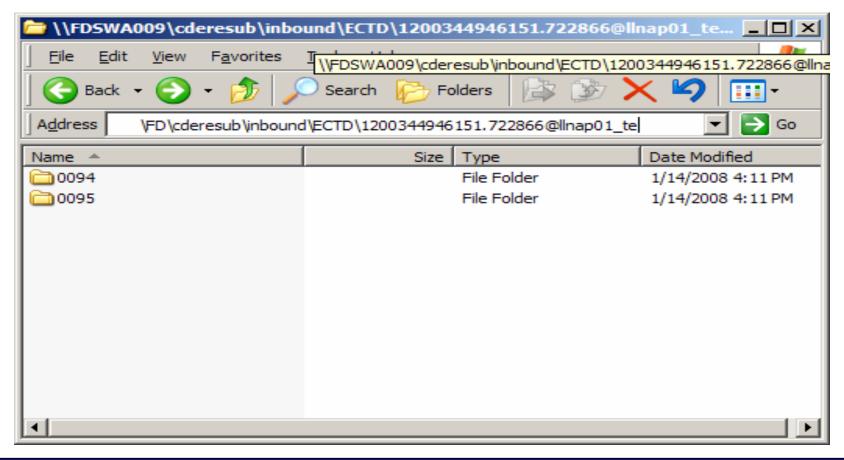
## Bad Characters in the file or folder names

- Using *spaces* in folder or file names is not recommended
   use a hyphen or underscore
- Other illegal characters:
- / forward slash
- \ backslash
- :- colon
- ? question mark
- "- quotation marks
- < less than sign
- > greater than sign
- | vertical bar,





#### Please send in one Sequence per transaction – please be sure that one sequence is correct





# Please do not send in one submission to be applied to multiple applications



- When working with the eCTD this will not work
- One submission should contain one sequence for one application



#### Single File Submission

• Usually a single PDF file

• Gateway submissions to be processed automatically must have the proper fillable

forms



## Incorrect or Missing Application Number on the form or US-Regional

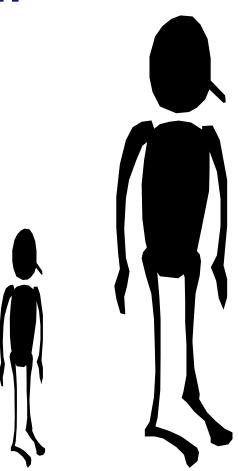
- We want your submission to go to the right place
- If the number is missing or nonexistent or incorrect we can't automatically process it
- Before you use the Gateway get a number first





## Mismatch between application type and form

- NDA with a 1571.PDF
- IND with a 356h.PDF





## **Duplicate Submissions Duplicate Submissions**



- Once is enough
- We only process the first submission not the duplicate
- If the first submission was in error contact CDER
  - We will be making an e-mail address available in the near future



#### **Naming Forms**

- Use the form number as the name
  - 1571.pdf for the for INDs
  - 356h.pdf for the NDAs
  - 2252.pdf for the Annual Reports
  - 3674.pdf for the Certification of Compliance
- If you need a continuation sheet consider name such as application\_form\_addendum that don't include the form number.



#### **Final Thoughts**

- Helpful to have a Technical Contact listed in your cover letter with an email and phone number
- Name your high level folder your 4 digit sequence number when eCTD
- Application numbers are 6 digits
- Be aware of path length keep it to 150 characters



# Still have questions? Relax and send us an email: esub@fda.hhs.gov

