Creating a Reviewable ANDA in eCTD Format

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The Goal

- Communication
- Tell your story to OGD reviewers
- Avoid interruptions/distractions from poorly formatted submissions
- Attention to details = a better overall story

General Information

- eCTD is FDA's standard for electronic submissions; paper still accepted but not preferred
- If unable to submit eCTD, seek a waiver
- Convert to eCTD at any time – no need to ask permission
- Once eCTD, always eCTD
- No paper
- "Refuse to Receive" if not complete or poorly formatted

Checklist for Success

- ✓ Send in eCTD format (with XML backbone)
- ✓ Complete a sample eCTD if you have never submitted eCTD before
- ✓ Read and adhere to the published guidance and specification documents
- ✓ Refer to the Elements of a Reviewable NDA contained in these slides
- ✓ Communicate with us when you have questions – ESUB@fda.hhs.gov

Send in eCTD Format

- **It's FDA's standard as of 1/1/08**
  - **FDA's goal:** *Implement a standards-based end-to-end fully electronic receipt, review, and dissemination environment*
- **Easier to review**
  - **Easier to find documents**
  - **Search and sort capabilities in tool**
  - **Checklist mapped to CTD**
  - **Standardized, consistent headings**

Paper remains an issue . . .
Send your ANDAs in eCTD!

ANDAs in eCTD Format – 3 years of Growth

Oct 2006		Oct 2007		Oct 2008	
Apps	Subs	Apps	Subs	Apps	Subs
76	318	315	1,036	1,296	4,857

Sample eCTD Process

- Successful sample = reviewable submission
- Prepare a sample that closely matches what your real submission will be
- Include Modules 1, 2 and 5, SPL, hyperlinks
- No reviewer will see your submission, your info is stored separately from real submissions

Sample eCTD Process

- Sample process takes < 30 days from the time of receipt
- Clarify any guidance or other questions in advance
- Obtain professional services or tools, don't DIY
- Instructions found at the eCTD Website:
  http://www.fda.gov/cder/regulatory/ersr/ectd.htm

Read and Adhere to the Guidances and Specifications

- CTD Guidances (M2, M4)
  http://www.fda.gov/cder/guidance/index.htm
- eCTD Guidances
  http://www.fda.gov/cder/regulatory/ersr/ectd.htm
  - eCTD Guidance
  - Module 1 – Regional Specification
  - Module 2 through 5 Specifications
  - Study Tagging File
  - Study Data Specifications
  - PDF Specifications
  - eCTD Table of Contents Heading and Hierarchy Document
  - eCTD Validation Criteria

Elements of a Reviewable ANDA

- Include a Table of Contents for any document more than a few pages long
- Include hyperlinks where text refers to other documents/information
  - Lack of hyperlinks impedes review
  - Inadequate links undermine reviewer confidence
  - One instance per page generally ok
  - Links to/from Modules 2 & 5 essential

Elements of a Reviewable ANDA

- Many reviewers find a “reviewer’s guide” helpful – can follow the checklist
- Reviewers appreciate a single document with links to all of the bioequivalence tables submitted (both Modules 2 and 5)

Elements of a Reviewable ANDA

- Submit uniform page orientations
  - Correct any pages that need to be rotated – make sure each page looks consistent to the next so reviewer doesn't need to adjust
  - Don't mix landscape with portrait
  - Make sure hyperlinked docs have PDF zoom set to match parent document (see PDF guidance)
- Scanned text not desirable; send searchable text
- Create PDFs from electronic sources

Elements of a Reviewable ANDA

- Make sure tables and charts are clearly legible – redo them if they are not
- Use the granularity provided in the eCTD TOC, do not submit large documents labeled “module 2” for example

Elements of a Reviewable ANDA

- Reference any included Word documents in the backbone and do not submit a separate CD or folder with Word files – it will be rejected
- If not submitting all elements of checklist, submit placeholder
- Use clear, concise leaf titles (don't make the reviewer guess what it is)

Elements of a Reviewable ANDA

- If reusing XML, make sure that all old references have been cleaned up
  - Name of the drug, number
- Make sure XML backbone and form matches
- Always use fillable form 356h
- Do not send in truncated files – QC your disks before submitting

Communicate with Us

- Office of Business Process Support (OBPS) – Division of Regulatory Review Support
- Electronic Submission Support Staff
  - Oversee EDR operations
  - Assist industry and reviewers with electronic submission review
  - Participate in the development of procedures, guidances and review tools
  - Provide training in electronic submission tools and procedures
  - Staff member assigned to OGD

Reaching Us

- ESUB@fda.hhs.gov
- eCTD Website: http://www.fda.gov/cder/regulatory/ersr/ectd.htm
- Electronic Submissions Website:
- http://www.fda.gov/cder/regulatory/ersr/default.htm
- Virginia Ventura, 301-796-1016