Ensuring a Successful Submission

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Overview

- The Goal
- Communication
- Elements of a Reviewable eCTD
- Submitting Electronic Submissions
- From a Reviewer's Perspective
  - Leaf titles, bookmarks, links
- References

The Goal

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

Remember!

- One of your goals is communication
  - Clarity improves reviewability
  - Consider application from reviewer's standpoint
  - Create document level Tables of Content with appropriate bookmarks
  - Use clear, concise, meaningful leaf titles
  - Use hyperlinks

Communicate: Have a Pre-Meeting to Discuss the Electronic Submission

- Schedule prior to assembling application, e.g., 6 to 12 months prior to submission of NDA
- Better constructed overall submission can enhance the review
  - Example leaf titles
- Discuss data, datasets, format

Communicate: Contact an Electronic Submission Coordinator

- Initiate contact prior to assembling application
- Submit a sample eCTD
- Clarify Guidance questions
- Contact addresses:
  - cder-edata@fda.hhs.gov
  - esub@fda.hhs.gov

Communicate: Contact Electronic Submission Coordinator

- 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

Elements of a Reviewable eCTD

- 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
  - Links to/from Modules 2 & 5 essential
  - Blue text should be reserved for hyperlinks

Elements of a Reviewable eCTD continued..

- Proper page orientation
  - Correct any pages that need to be rotated – make sure each page looks consistent to the next so reviewer doesn't need to adjust
  - Make sure hyperlinked docs have PDF zoom set to Inherit Zoom (see PDF guidance)
- Scanned text not desirable; send searchable text
- Create PDFs from electronic sources

Elements of a Reviewable eCTD
continued..

- 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 eCTD
continued..

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

Elements of a Reviewable eCTD
continued..

- 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

Submitting Electronic Submissions

- CDER:
  - ALL electronic submissions for original applications, supplements, and amendments, must be sent to the Central Document Room
- CDER: OGD
  - All electronic submission to the OGD document room
- Send only ONE copy of the electronic submission
- Use the correct electronic media and choose type appropriate to size of submission

Submitting Electronic Submissions

Continued…

- eCTD
  - Should not include paper (except for briefing documents
    - If Part 11 compliant electronic signatures are available otherwise only documents requiring original signatures
  - Include all required eCTD files
  - Include all required forms, letters, and certifications
  - Be sure ALL files submitted are referenced in XML backbone
  - Do not use Node extensions
  - Use the ESG
  - Use Fillable forms

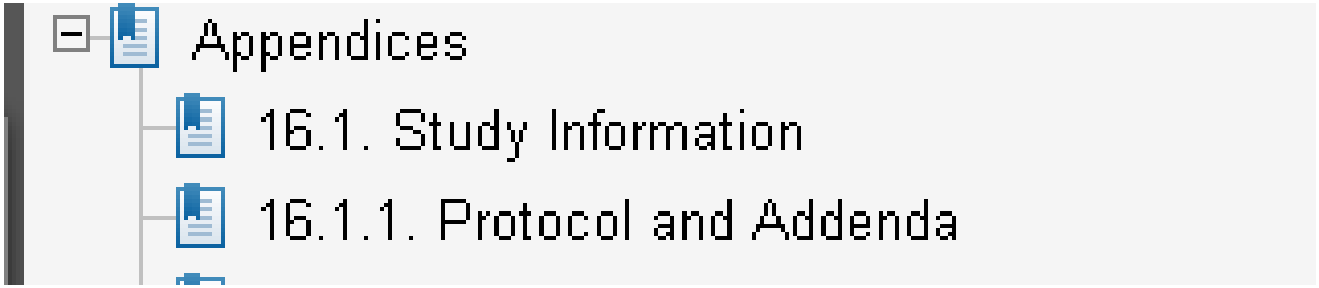
Submitting Electronic Submissions

Continued…

- Ensure what we receive is what you wanted to send
  - No blank electronic media
  - No empty folder
  - No unloadable media

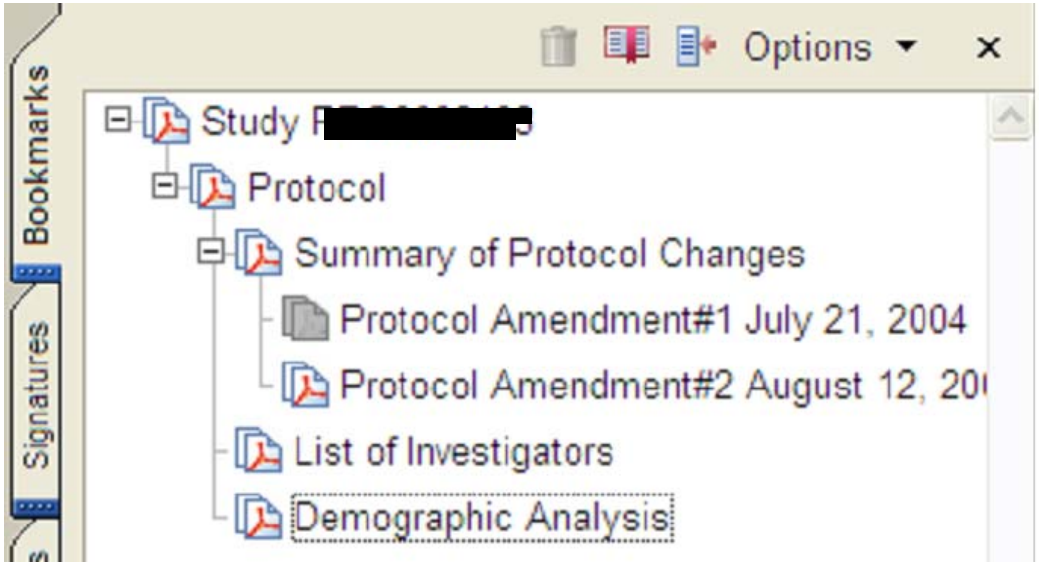
Bookmarks

- If you have 4 protocols don't only provide one bookmark
  - Include a bookmark for each protocol and bookmarks for the TOC in each protocol
  - Below is a bad example that shows one bookmark



Bookmarks

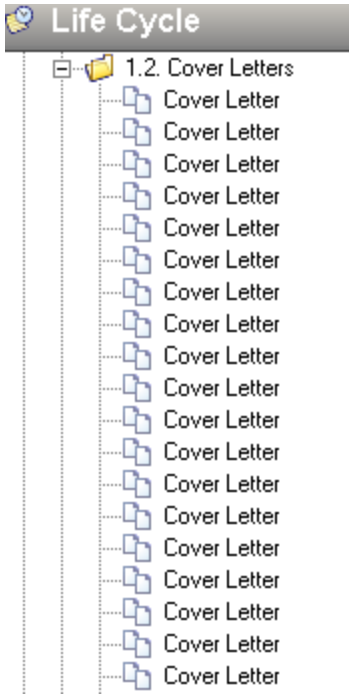
- Useful to have a bookmarks arranged hierarchically



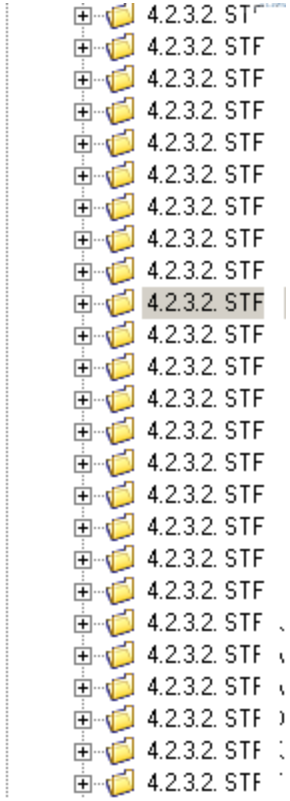
Leaf Titles

- Here are 2 examples of what not to do:
- Here is what you should do
  - Provide date, sequence for cover and forms
  - Provide study title or shortened study titles not study ID or STF with study ID

Example #1



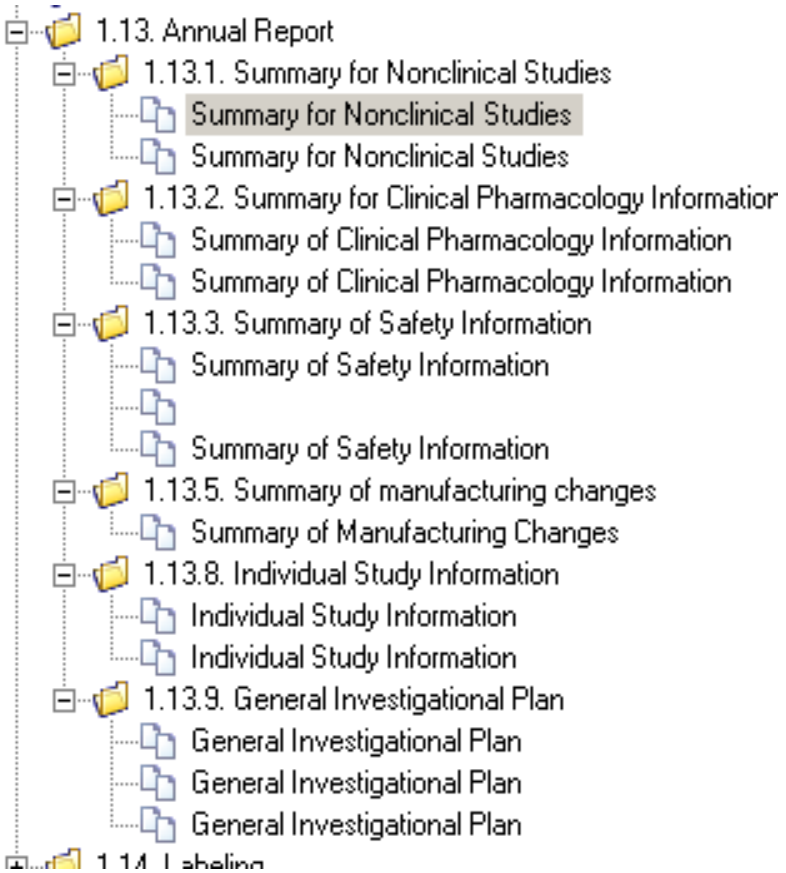
Example #2



Leaf titles should be clear, concise, indicative of the contents

Leaf Titles

- Here is another example of what not to do:
- Here is what you should do
  - Provide date, time period or something that differentiates one from the other



Leaf titles should be clear, concise, indicative of the contents

Provide Hypertext Links

- They enhance navigation and improve reviewability.
- When to provide them?
  - Anytime the text refers to a reference (table, figure, etc.) that is not on the same page
  - Provide cross reference links to other documents if necessary
  - Check your links
  - When there are changes reported in a summary provide links

References

- CDER Contact for information on eCTD submissions
- esub@fda.hhs.gov
- CDER Contact for information on SDTM submissions
- cder-edata@fda.hhs.gov
- Electronic Regulatory Submissions and Review website
- http://www.fda.gov/cder/regulatory/ersr/default.htm
- International Conference on Harmonization
- http://www.ich.org

Final Thoughts….

- Remember what we said earlier about telling your story
  - Make sure it is complete
  - Put items where they belong
  - Provide attributes if applicable
  - Provide good navigation
  - Make sure it is successful submission!