Promotional Submissions in eCTD Format - Common Errors and Validation

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Outline

- Background
- General Errors
- Form 2253 Submission Errors
- Advisory/Accelerated Approval Submission Errors
- Grouped Submission Errors
- Test Submission Process

Timeline

- June 24, 2019 – FDA Published the Final Guidance titled “Providing Regulatory Submissions in Electronic and Non-Electronic Format – Promotional Labeling and Advertising Materials for Human Prescription Drugs”
- Guidance describes the structure and format for promotional submissions in eCTD format
  - Contains both Binding Requirements and Nonbinding Recommendations
- 24 months after the publication of the Final Guidance, required submissions described in the guidance must be submitted in eCTD format
  - Required submissions will be mandatory starting June 24, 2021
- Firms are not required—but are STRONGLY encouraged to—submit electronically other types of promotional material submissions
  - NOTE: Complaints should only be submitted as **paper copies** and cannot be accepted in eCTD

Submission Processing

- eCTD-formatted submissions facilitate automated processing of Promotional Submissions
- Manual processing of Promotional Submissions requires greater level of effort than other submission types
- eCTD *only* allows Promotional Submissions to be coded automatically when free of errors

OPDP QC Process

- Three primary pathways for Promotional Submission Quality Control (QC)
  - Electronic Submission Gateway (ESG) Validation
  - Daily QC reports to OPDP Project Management Team
  - OPDP Document Room Manual Review
- QC reports monitor submissions for invalid Issue Date, Incomplete Submissions (missing Form, labeling, or materials), or submissions that have failed automated processing
- Document Room notifies RPM team when errors in coding are identified
- OPDP RPM will contact Sponsor when errors are identified in Promotional eCTD Submissions

General Errors

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- Incorrect Application Number
  - Promotional Materials for one product submitted to a different product
    - Submitter will need to revise and resubmit
  - Same 2253 for multiple Application Types
  - Incorrect Application Number in Cover Letter or Form 2253
- Incorrect Material Document Type Code
- Audience Type in US-regional file doesn't match the Cover Letter or Form
- Issue Date in US-regional file improperly formatted
  - Correct format is YYYYMMDD
- Orphan files included in Submission

Submission ID

- The Submission ID field allows a submission to be linked to a previous eCTD Submission
- When submitting files that should be linked, the Submission ID field should match the previous Submission's Sequence Number
  - Ex: The Submission ID of an Advisory Resubmission should match the Sequence Number of the Original Advisory
- Submitting an incorrect Submission ID can result in delayed processing

Form 2253 Errors

Form 2253 Errors

- Product Labeling not submitted under 1.14.6
  - Excluded or submitted under a different heading
- Materials not submitted under Section 1.15.2.1
- Including a Cover Letter under a Correspondence Heading
- Including a Form 356(h)

Advisory/Accelerated Approval Errors

Advisory/Accelerated Approval Errors

- Labeling submitted under Section 1.14
  - Single Annotated Label submitted under Section 1.14
    - Should be under 1.15.2.1.3 for each material
  - Clean copy submitted under Section 1.14.2 or 1.14.6
    - Not required
- Hyperlinks to external sites or resources
- Submitting a Withdrawal instead of a General Correspondence
  - General Correspondence should be used to notify Agency that Submitter will no longer wait for Advisory Comments and plans to disseminate materials
  - Withdrawal Heading should only be used when Materials will not be disseminated publicly

Grouped Submission Errors

Grouped Submission Errors

- Form 2253 Box 3 – “Single Product” selected when submitted as a Grouped Submission
  - “Multiple Products” box should be checked
- Application List in US-regional file doesn’t match Application List with Form 2253 or Cover letter
- PIs for all Products in Group not included
- Supplemental Application List for Form 2253 not included or placed under Cover Letter Heading
  - Should be placed under the same heading as Form 2253

Test Submission Process

Test Submissions

- Test Submission Process provides Submitters with an opportunity to validate eCTD submission structure prior to submitting to Production Environment
- Recommendation is to submit at least one of each Promotional Submission Type in Test Environment before submitting in Production
- OPDP Project Management Team will review the structure of the submission and provide feedback
  - Will provide instructions for corrections, if necessary

Test Submissions - Process

- Begin by viewing the available presentations on the OPDP eCTD webpage
  - Prepare any questions you may have for the OPDP eCTD Team
- Contact the OPDP eCTD Mailbox and send the following items:
  - Questions to be answered
  - Types of Submissions (Accelerated Approval, Advisory, 2253, etc)
  - Availability (Dates & Times) for a 30-minute meeting
- OPDP eCTD Team will schedule a planning meeting
  - Will provide answers during the meeting
  - Assist with planning test cases
- Submit Test Files
  - Notify OPDP eCTD Mailbox of results (either accepted or rejected)
  - Be sure to provide the COR ID when the file is accepted
- OPDP eCTD Team will review test submission(s) and provide feedback

A Word on Enforcements…

- Very few Companies test Response Letters:
  - Response to Notice of Violation or Warning Letter
  - Response to Letter of Inquiry
- Response Letter Submissions are not mandatory after the 24-month transition period
- Submitters are strongly encouraged to include these Submission Types in their Test Plan

Resources

- OPDP eCTD Mailbox- OPDPeCTD@fda.hhs.gov
- OPDP eCTD Webpage - www.fda.gov/OPDPeCTD
- eCTD Test Submission Instructions - https://www.fda.gov/industry/create-esg-account/setting-webtrader-account-checklist
- OPDP Electronic Submissions Guidance - https://www.fda.gov/media/128163/download
- eCTD Validation Criteria - https://www.fda.gov/media/87056/download
- Comprehensive Table of Headings – https://www.fda.gov/media/76444/download
- eCTD Submission Standards – https://www.fda.gov/media/93301/download
- eCTD Sample Submissions - https://www.fda.gov/media/83809/download


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