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Issue Management in P21E

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Meet the Speaker

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Title: Principal Statistical Programmer

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I worked in some local CROs at the beginning after graduation from university, and then moved to Parexel. Have some experiences in statistical programming and project management in general medicine and oncology area.



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• The author(s) have no real or apparent conflicts of interest to report.



Agenda

Introduction of Issue Management in P21E
 Examples: Fix and/or Explain Issues

Introduction of Issue Management in P21E



Introduction of Issue Management in P21E

What is Issue Management in P21E
Importance of Issue Management
How to Support Issue Management in P21E
Issue Status and Issue Progress
Impact, Severity and Type
Types of Issue Sources





What is Issue Management in P21E

Issue management in P21E is study team's cloud-based workbench for fixing or explaining noncompliant data.

All your teamwork. All in one spot.

Never lost in an inbox.





Importance of Issue Management

Improve submission data package readiness in an ongoing way.
Identify quality issues early and fix with collaborators.
Improve data quality throughout clinical trial life cycle.

Goal: >= 90 by the time of submission



How to Support Issue Management in P21E

- Overview dashboard online/dynamic, check issue progress, identify critical issues
- Default or customized fix tips and customized explanations

			∰ Home > Pine	naclasomab > ABC-123-DEFG > SDTM				
Issue Details Explanation Activity	0				6			Close
SD2232: Missing SSTDTC Trial Summary Parame Description 'Study Start Date' (SSTDTC) record must be populated in Trial Summary	Dataset I	mpact Status	• Open	Comment	days 20%	More Details Data Fitness Score	More Detail	20% Keep Going
(TS) domain. It is expected for SDTM IG v3.1.2 data and required for data in all more recent SDTM versions.	Affected C	Change Assignee	Select	~ Alice these	e.	arn about Status 🗹 🛱 Changes from	Last Validation	How to Make Progress Make Progress by fixing Issues, changing Issue Status, and adding Explanations.
Fix Tips Update the mapping of the Trial Summary domain to include this parameter, as is requested in the FDA's Technical Conformance	Type Error	Sources	Şelect Design		' days(ah Ang e will t	146 New Issues	56	View Issues
Guide. [23] Include the parameter value that is applicable to the study in the TSVAL variable. If the parameter does not apply to the current study,			Data Mapping	P PJ 7 Assig		Updated Issues	c	Issue Status Default for issues found in current validation. Pladge to fix the issue before the next validation.
still include the parameter, but leave TSVAL null and set TSVALNF = NA: [2]] If unable to update the Trial Summary domain to include this FDA-			Metadata Process	Assig	ar may t	Unchanged Issues	114 View Changes	Padge to fix the issue before the next validation.
requested parameter, document the reason in the Reviewer's Guide.	0		False Politive			🖄 Submission Ct		study, once all final disposition dates are known.
Issue Details Explanation Activity	0		a 2	ual Screen View 🔶 Previous Is	Issue			sponsor's approval before an Issue is Closed.
Explanation	Suggestions					· •	Technical Rejection 1 "Reject" issues	Explanation added for regulatory agency reviewers.
B <i>I</i> ⊨ ≡ <i>θ</i> ∞	Q, Search		Reason	Action	Bownlaad 80 100 120		lone	Fixed For Issues that were resolved. Our system sets them to Fixed during validation. You cannot manually set Issue Status to Fixed.
<demo as="" collected.="" data="" explanation,="" how="" noting="" represents="" the="" this=""></demo>	Explanation <demo explanation,<="" p=""></demo>	noting how this represents the data a collected			te			





Issue Status and Issue Progress

Issue Status	Contents
Open	Default, newly open OR once fix then later reopen
Fix Now	Plan to fix before next data transfer, programmer fix immediately
Fix Later	Plan to fix after next data transfer but before next milestone, naturally fix itself by EOS
To Close	Ready to be Closed, need approval
Closed	Cannot be fixed, must explain
Fixed	Truly resolved, or fixed in datasets



Issue Status and Issue Progress

Typical Issue Lifecycles

Unfixable Issues





Impact, Severity and Type

Review	Impact
Reject	
High	
Medium	
Low	

PMDA Severity
Reject
Error
Warning

Message Type	
Error	
Warning	
Notice	





Types of Issue Sources

Type of Sources	Contents
Design	Data collection design
Ū	
Data	Error in data entry or lack of data in an ongoing study
Mapping	Specification or programming
Metadata	Define.xml, e.g., a misnamed aCRF file
Process	User's validation process, e.g., a missing aCRF file
False positive	P21 enterprise validation rule sensitivity or error



Examples: Fix and/or Explain Issues

Examples: Fix and/or Explain Issues (1)

Rule ID	Message	Description
SD0002	NULL value in variable marked as Required	Required variables (where Core attribute is 'Req') cannot be NULL for any records.

Source	Root Cause	Resolution
Design		Improve CRF design or clarify in CRF completion guide in study start up in future
Data	Data incomplete or CRF page to be inactivated in database	Notify DM to follow and fix



Examples: Fix and/or explain issues (2)

Rule ID	Message	Description
SD0021	Missing End Time- Point value	One End Time-Point variable is expected to be populated when an event or an intervention occurred. (E.g., End Date/Time of Event or Intervention (ENDTC), or End Relative to Reference Period (ENRF), or End Relative to Reference Period (ENRTPT) should not be missing, or Occurrence (OCCUR) = 'N' or Completion Status (STAT) != ") or Duration (DUR) != ").

For issues triggered by AE.AEENDTC

Source	#	Root Cause	Resolution
Design	1	For subject ended study, AE not resolved	Explain
		For sites with limited resources, data not yet entered for resolved	
Data	2	AE	Follow up till fixed or explain
Data	3	For subject on treatment/study, data may be not yet observed	Follow up

For ongoing studies: 1 & 2 & 3

For interim analysis: 1 & 3

Special case for Source # 2: Data unable to be cleaned due to site early closure.

For final analysis: 1

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Rule ID	Message	Description		
SD1344	Value forDECOD not found in WHODrug dictionary	Value for the Standardized Medication Name (DECOD) variable must be populated using a Drug Name from the WHO Drug dictionary version specified in the define.xml.		
For issue	For issues triggered by CM.CMDECOD			
Source	Root Cause Resolution			
Mapping	Truncation of values Fix in program		Fix in program	
Mapping	Not split values > 200 char with semicolon ^a Fix in program		Fix in program	
Process	Wrong version of the dictionary configured in the data package prior to validation Reset the configuratio			
False positive	Values exactly 200 char in length are being identified as too long because the conformance logic is looking for a semicolon closest to 200 char to represent a split value ^b			



Examples: Fix and/or explain issues (4)

Rule ID	Message	Description
SD0060	Variable in dataset is not present in define.xml	Variables included in the dataset must be described in the data definition document (define.xml).

Source	Root Cause	Resolution	
Mapping	Variable is inappropriate in the data	Fix in program to remove it	
	Variable is appropriate in the data, but not in		
Metadata	define	Update define to add it	



Examples: Fix and/or explain issues (5)

Rule ID	Message	Description
DD0114	Invalid usage of split datasets for non-general- observation-class datasets	Split datasets can only be used for general-observation-class datasets (Events, Findings, Interventions).

For issues triggered by FA

Source	Root Cause	Resolution
False positive	Per SDTMIG3.2, the Findings About (FA) domain can be split either byCAT values or relative to the parent domain of the value inOBJ, For example, FAMH would store Findings About MH records, sponsor's implementation is in line with SDTMIG recommendation (section 4.1.1.7 of SDTMIG3.2).	Explain with standard template



Examples: Fix and/or explain issues (6)

Rule ID	Message	Description
AD1024	Traceability rules not executed due to missing DM dataset	When validating ADaM datasets, the DM dataset must also be included to ensure traceability. Note: For the final submission the eCTD structure should be maintained. Therefore, the SDTM and ADaM datasets should be submitted in their appropriate locations. Do not include the DM dataset in the /analysis/adam/datasets folder.

Source	Root Cause	Resolution
Process	Missing DM xpt file in ADaM data package	Include it to ensure traceability

Similar issues like AD1025 for AE, AD1026 for EX



Examples: Fix and/or explain issues (7)

	Rule ID	Messa	age	Des	cription
	AD1012	Secondary custo present but its prin not pre	mary variable is	most commonly used variable mu describing it (*N or *C) is present. instances of custom variables. Spe AD0075, AD0097, and AD0201 exi	r and numeric variables, the primary or st be present if its secondary version This is the generic rule to capture all ecific rules AD0064, AD0066, AD0070, st for some standard ADaM variables. ther standard ADaM variable.
24	Source		Root cause		Resolution
	The secondary v		variable is provided but the primary		
N	Mapping, Metadata is not. E.g. ARE		L01N in dataset, AREL01 not.	Add the primary variable	
This issue is usu variables such a ends in 'N' P21E		ally trigged by Sponsor standard s ADOMAIN, as the variable name is assuming it contains a numeric			
Design, False positive version of a char		racter variable.	Explain with standard template		





Thank You!



