

# The Implementation of ICH Development Safety Update Report (DSUR) Guidance

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# Agenda

- **Background and Overview of the new ICH Guidance**
- **Implications for study sponsors**
  - **Detailed process**
  - **Timeline**
  - **The Clinical Trials Inventory**
  - **Data-Management**
- **Implementation in Biostatistics Department**
  - **Data Mapping Approaches**
  - **Type of Outputs to be provided**
- **Conclusions**

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  - Type of Outputs to be provided
  - Use of CDISC principles
- **Conclusions**

# Background and Overview of the new ICH Guidance



- Regular analysis of safety is crucial for the assessment of risk to trial subjects and to understand the risk-benefit of a medical product
- PSUR (Periodic Safety Update Report) is for post-marketing periodic reporting
- For medical product under development (IMP), some ICH countries required submission of periodic safety report
  - Differences in the content
  - Differences in the format
  - Differences in the timing

(1) US IND Annual Report [21 CFR 312.33]

(2) EU Annual Safety Report [2001/20/EC and ENTR/CT3]

(3) Japan Investigational Product Serious / Infection Case Periodical Report' – 6 monthly [PFSB 0229011 Feb 08 and 1001005 Oct 08]

# Background and Overview of the new ICH Guidance

## Overview and Benefits of new DSUR ICH Guidance - DSUR History

ICH guideline E2F – Note for guidance on development safety update report:

September 2010: Final adoption by CHMP

September 2011: Date for coming into effect

August 2011: FDA Guidance to industry document

<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm073109.pdf>



September 2010  
EMA/CHMP/ICH/309348/2008  
Committee for medicinal products for human use (CHMP)

ICH guideline E2F  
Note for guidance on development safety update reports  
Step 4

Transmission to CHMP	June 2008
Adoption by CHMP for release for consultation	June 2008
End of consultation (deadline for comments)	December 2008
Final adoption by CHMP	September 2010
Date for coming into effect	September 2011

ICH E2F DSUR

EMA/CHMP/ICH/309348/2008

E2F Development Safety Update Report FDA Aug 2011

# Background and Overview of the new ICH Guidance

## Overview and Benefits of new DSUR ICH Guidance



The DSUR is an annual review and evaluation of pertinent safety information related to an Investigational Medical Product, before and after marketing authorization

- Safety information during the **current review period**
- Analysis of new information based on previous knowledge of the product safety
- Consistent regulatory terminology
- Co-ordinated **periodicity** of reports
- Same **scope** and **content** for same trials in different regions

# Background and Overview of the new ICH Guidance

## Overview of new DSUR ICH Guidance – Key points



<b>DIBD</b> Development International Birth Date	The sponsor's first authorization to conduct a clinical trial in any country worldwide. It is used to determine the start of the annual period for DSUR
<b>DLP</b> Data Lock Point	The last day of the one-year reporting period
Scope	Molecule
Periodicity	Once a year no more than 60 calendar days from DLP
Information to be included	Any completed and ongoing trials: <ul style="list-style-type: none"><li>•All Indications</li><li>•All strengths</li><li>•All formulations</li><li>•All patients populations</li></ul>
PSUR Overlap	PSUR and DSUR both needed when Clinical Trials continue after market approval

# Background and Overview of the new ICH Guidance

## Overview of new DSUR ICH Guidance – By-Period vs Cumulative Outputs



*By-Period Outputs*

Only 'events' occurred in the reporting period (one year)



*Cumulative Outputs*

All 'events' occurred since DIBD up to DLP



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- Conclusions

# Implications for study sponsors

## Before DSUR

- Multiple reports (e.g. one for FDA one for EMA)
  - Multiple database cleaning / extract
  - Multiple outputs programming tasks
- Unclear requirements for outputs production
- Last minute requests
- No central coordination (e.g. from safety dept)

# Implications for study sponsors

## Detailed Process

- Develop cross-functional SOPs / Process Guide
- **Track** of projects requiring DSUR
  - Development International Birth Date (**DIBD**)
  - Countries / Regions requiring submission
  - Identification of Trials to be included
    - **Clinical Trials Inventory**
- Outputs
  - Grouping of studies
  - Identification of Additional outputs/rules to be provided / followed
- Outputs from SAE database
- Standard mapping rules / outputs programs

# Implications for study sponsors

## The Clinical Trial Inventory

- **All «interventional» studies ph 1 to 4** sponsored by «sponsor XXX»
  - No observational studies
  - Corporate and non-corporate from all regions
  - Non corporate trials can be incorporated but usually provided by Medical Affairs
  - Planned vs Ongoing vs Completed study
    - **Planned**
    - **Ongoing**  
when the study was approved by any Health Authorities in or before the review period
    - **Completed**  
ICH-E2F: defined as “a trial for which a final CTR is available, so locked db and there is no further collection of data
- **Stratification factors** (indication, formulation, etc.)
- Key Contacts (CRO, DM, Trial Manager)

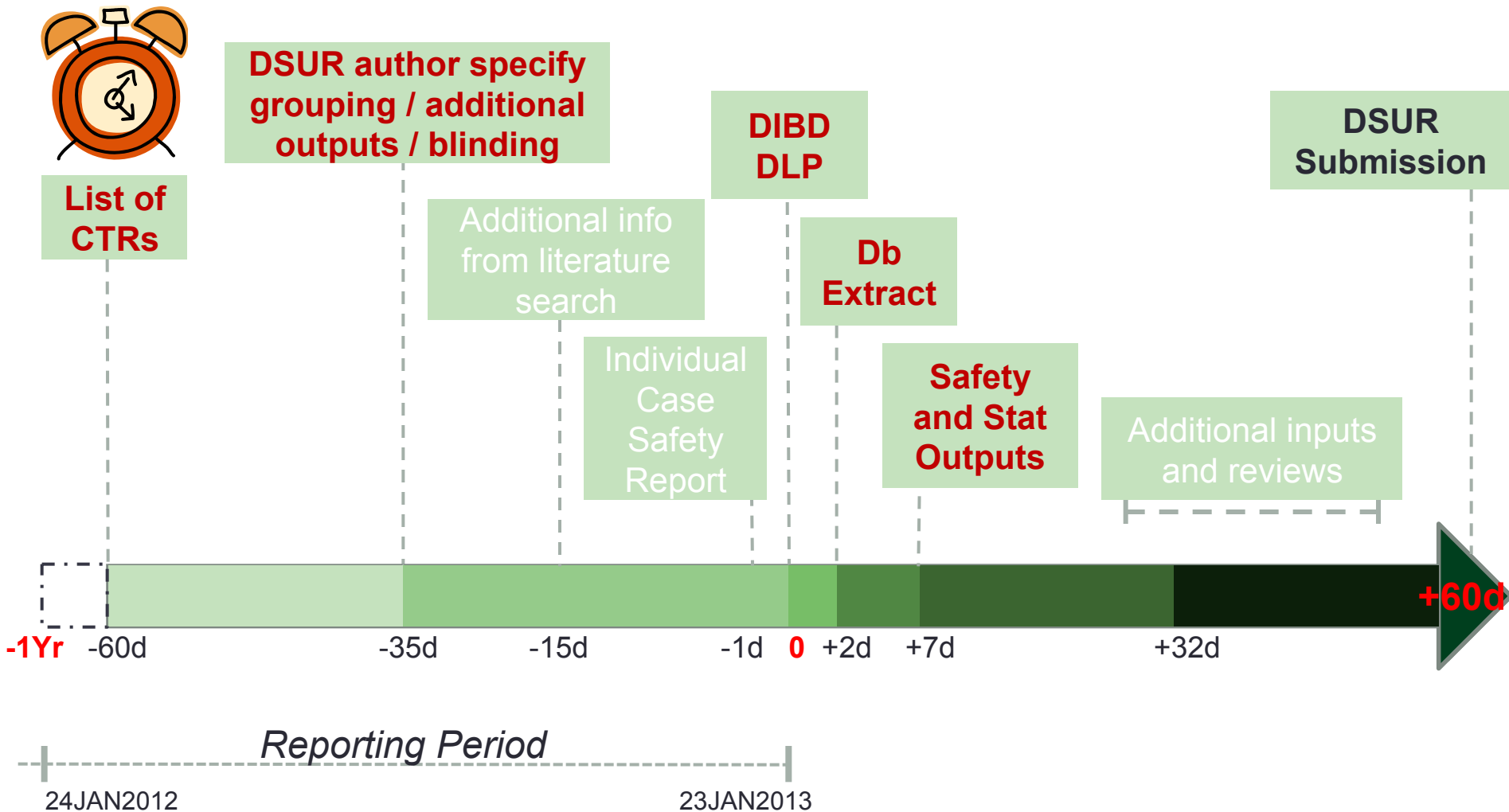
# Implications for study sponsors

## Data Management

- Retrieving/Extracting data for multiple studies
  - **In-house / CRO / Investigator Trials**
  - Other trials when the medical product is used in combination to other IMP(s)
- Data cleaning/reconciliation as much as possible
  - Demography, Adverse Events, Exposure, Disposition, Deaths
  - SAE reconciliation
- MedDRA version alignment not needed
  - Complete coding not needed

# Implications for study sponsors

## Possible Timeline



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# Implementation in Biostatistics Department

- Clear **process** definition e.g. SOP
- **Technical Guidance**
  - Global Derivation Rules
  - Standard Mapping
  - Outputs Templates including SAS Program Templates
- **Aligning differences in existing SAPs**
  - Definition of Treatment Emergent AEs
  - Definition of Population e.g. Safety vs ITT Population
- Blinding
- Application of **data cut-off / reporting period**
- Identification of new information from previous reporting period
  - **Maintaining historical data** (e.g. DSUR2012, DSUR2013, etc)



# Implementation in Biostatistics Department

## Data Mapping Approaches

### Option 1

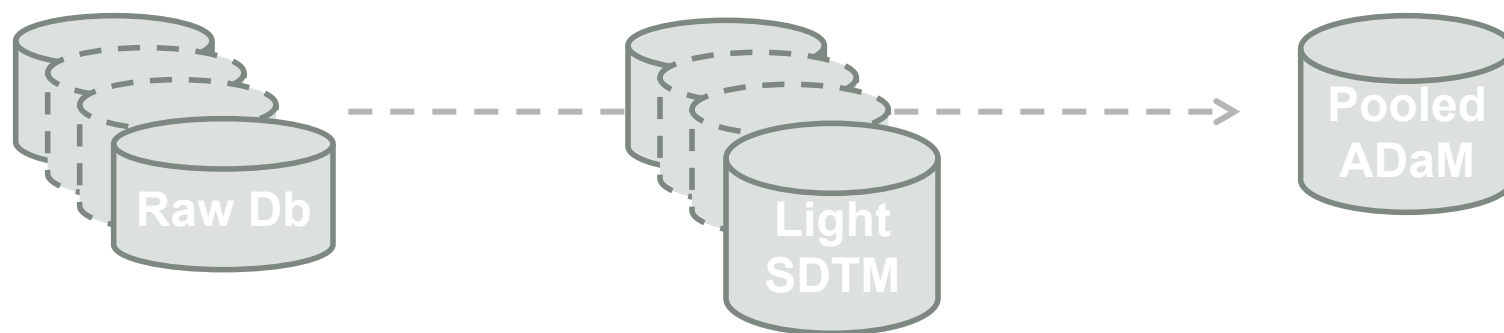


- Available in late stage projects when for example submission effort already occurred
- Harmonization already occurred
- Trial domains facilitate identification / reporting of trial characteristics

# Implementation in Biostatistics Department

## Data Mapping Approaches

### Option 2



- The most common situation of early stage development projects or projects where CDISC investment did not yet occur
- Light SDTM can be the start of the CDISC «effort»
  - TS (Trial Summary Datasets)
  - DM (Demographics), AE (Adverse Events), EX (Exposure), DS-light (light disposition) for deaths / end of treatment

# Implementation in Biostatistics Department

## Data Mapping Approaches

### Option 3



- The most common situation of early stage development projects or projects where CDISC investment did not yet occur
- Harmonisation effort directly in the pooled ADaM including Controlled Terminology

# Implementation in Biostatistics Department

Data Mapping Approaches - ADaM Pooling - ASDL



## ADSL For the purpose of DSUR:

- Demographics
- Arms/Treatments Grouping
- Study Population
- Trial Indication and additional stratification factors
- Deaths and Disposition

In addition

- Compliance / Exposure (Subject Years)

# Implementation in Biostatistics Department

## Data Mapping Approaches - ADaM Pooling - ADAE



### ADAE For the purpose of DSUR:

- Description including coding terms (PT and SOC)
- Action Taken, Outcome, SAE, Severity
- Drug (IMP) relationship
- Treatment Emergent Identification
  - Imputation of partial start date as per company standard
  - AE started before first IMP administration and within xx days from last IMP drug administration (follow-up period). E.g. 50 days
- Flag of **events belonging to the reference period**

# Implementation in Biostatistics Department



## Data Mapping Approaches - ADaM Pooling

### Standard Corporate ADaM requirements for DSUR - Additional Rules

- Exposure (Subject-years)= sum for all subjects of  
[(min(last treatment admin date, end of reporting period) – first treatment admin date) +1] / 365.25
- Compliance derivation depends on indication/type of therapy  
e.g. relative dose-intensity in oncology

# Implementation in Biostatistics Department



## Type of Outputs to be Provided

### Outputs to be provided from clinical trials database as an appendix

3a. Status of Ongoing and completed trials	Cumulative
3b. Estimated cumulative exposure	Cumulative
4a. Cumulative subject exposure to IMP by age and gender	Cumulative
4b. Cumulative subject exposure to IMP by racial group	Cumulative
R2a. Tabulation of ongoing trials with number of subject drop out count	Cumulative
R2b. List of subject who died during the reporting period	Period
R2c. List of subject dropped out during the reporting period due to AE	Period
R3. Cumulative tabulation of AEs with frequency higher than 5%	Cumulative
SAE. Cumulative summary tabulation of serious adverse events	Cumulative
Compliance. Subject compliance to study drug in the reporting period	Period

Rxx, are applicable to US only

The numeration above is the numeration chosen by one of our customer

**Study is always used as a 'stratification' factor**

# Implementation in Biostatistics Department

## Type of Outputs to be Provided



## Depending on the status of the IMP development

- Additional Stratifications
  - By Indication
  - By Dosage
  - Type of drug used in combination.
    - E.g. drugs containing a specific agent
- Additional Outputs
  - Pooled adverse events tables
  - SMQ and other AEs of «potential» interest



# Implementation in Biostatistics Department

## Type of Outputs to be Provided – Examples / Templates

The table can be automatically created if SDTM is available (e.g from trial domain)

B.a : Status of Clinical Studies  
Table 3.a.2 : Completed Studies

Study Identifier	Ph.	Country	Title	Dosing Regimen Population	Subjects Exposed
013 I		France Germany	Open-Label, Randomized, Controlled Phase I Study Of To Evaluate The	Subjects With Recurrent/Metastatic Squamous Cell Cancer Of The Head Or Neck	2wk 00mg : 3 2wk 000mg : 3 2wk 000mg : 4

	STUDYID	DOMAIN	TSPARMCD	TSPARM	TSVAL
1	013	TS	ADDON	Added on to Existing Treatments	Y
4	013	TS	AGESPAN	Age Group	ADULT (>18)
5	013	TS	AGEU	Age Unit	YEARS
8	013	TS	DOSE	Dose per Administration	500 or 2000
9	013	TS	DOSFRQ	Dosing Frequency	QD for 4 days then QS or BIS
10	013	TS	DOSU	Dose Units	mg
11	013	TS	INDIC	Trial Indication	RECURRENT/METASTATIC SQUAMOUS CELL CANCER OF THE HEAD AND NECK
12	013	TS	OBJPRIM	Trial Primary Objective	Phase II part: To assess the progression-free survival (PFS) in subjects with recurrent an...
18	013	TS	PLANSUB	Planned Number of Subjects	177
19	013	TS	RANDOM	Trial is Randomized	Y
20	013	TS	RANDRAT	Ratio for Randomization	1:1:1
24	013	TS	SPONSOR	Clinical Study Sponsor	I ...
25	013	TS	TBLIND	Trial Blinding Schema	OPEN LABEL
26	013	TS	TCNTRL	Control Type	COMPARATIVE TREATMENTS
27	013	TS	TDIGRP	Diagnosis Group	SUBJECTS WITH RECURRENT/METASTATIC SQUAMOUS CELL CANCER OF THE ...
28	013	TS	TINDTP	Trial Indication Type	TREATMENT
29	013	TS	TITLE	Trial Title	Open-label, randomized, controlled Phase I/II study of cilengitide to evaluate the safety ...
30	013	TS	TITLE	Trial Title	in subjects with recurrent/metastatic squamous cell cancer of the head and neck (ADV...

Output ID: T\_3a 0

**Cytel**  
Geneva Branch

## Type of Outputs to be Provided – Examples / Templates

**Table 3b: Estimated Cumulative Subject Exposure from Ongoing and Completed Clinical Trials  
Safety Population**

Study Identifier	Investigational arm Number of subjects	Sum of Subject-Years
EMERGE-01-03062	18	53.60
EMERGE-02-03063-02	80	3.03
EMERGE-03-03064-003	33	5.94
EMERGE-04-03065-004	53	4.68
EMERGE-05-03066-005	53	5.10
EMERGE-06-03067-006	16	9.15
EMERGE-07-03068-010	4	0.21
Overall	419	101.71

Safety Monitoring\Safety Report\Pooled\DSUR 2012\Primary\TLF\Pgm\Tables\Appx3b.sas 03DEC2012

Cut off date = 23NOV2012

$$\text{Subject Year} = (\text{Last Exposition Date to } - \text{First Exposition Date to } + 1) / 365.25.$$

Output ID: Annv3h 03DEC2012 20:41

# Implementation in Biostatistics Department

## Type of Outputs to be Provided – Examples / Templates

Table 3.b : Cumulative Subject Exposure in Ongoing and Completed Trials by Indication

Exposure To:	Healthy Subjects N(subject -yrs)	Subjects With ----- N(subject -yrs)	Subjects With SCCHN N(subject -yrs)	Subjects With NSCLC N(subject -yrs)	Total N (subject -yrs)
Monotherapy	104 ( 5.0 )	81 ( 36.1 )	130 ( 55.0 )	105 ( 17.1 )	395 ( 67.9 )
Combination Therapy	15 ( 0.2 )	497 (439.1 )		117 ( 58.7 )	833 (572.1 )
Any Therapy	119 ( 5.2 )	578 ( 5.2 )	130 ( 55.0 )	212 ( 75.7 )	1128 (631.9 )
Comparator Therapies		343 (172.6 )	62 ( 34.5 )	112 ( 36.2 )	559 (257.1 )
Total	119 ( 5.2 )	92 (647.8 )	192 ( 89.5 )	254 (111.9 )	1787 (897.0 )

Data cut-off date: June 2013.

Subjects are reported as treated.

(a) Subjects included into study 001 as well as into study 002 are counted twice.

Example from a late stage development program with stratification by **indication** and **type of combination therapy**

# Implementation in Biostatistics Department

Type of Outputs to be Provided – Examples / Templates

Example of Treatments Grouping in ADSL

TRT01PN	TRT01P
1	IMP 500 MG
2	IMP 1000 MG
3	IMP 1500 MG
4	IMP 1000 + TREATMENT WITH XX
5	IMP 1500 + TREATMENT WITH YY
6	IMP 2000 + TREATMENT WITH XX



Derived from ARMCD

Use of standard ADaM ADSL variables **TR01PG1/N** to pool treatment

1=MONOTHERAPY

2=COMBINATION THERAPY TYPE A

3=COMBINATION THERAPY TYPE B

# Implementation in Biostatistics Department

Type of Outputs to be Provided – Examples / Templates

**Table 4a. Cumulative Subject Exposure to IMP from Ongoing and Completed Trials by Age and Gender**

Age group (Years)	Study Identifier	Male N (%)	Female N (%)	Total N (%)
>= 18 - < 45	2-002	1 (100.0)		1
	2-003		2 (100.0)	2
	2-004 (Phase I)	11 ( 57.9)	8 ( 42.1)	19
	2-004 (Phase II) - estimated			
	2-006 - estimated			
	2-007	4 ( 80.0)	1 ( 20.0)	5
	Total	16 (59.3)	11 (40.7)	27
>= 45 - < 65	2-002	9 (100.0)		9
	2-003	7 ( 50.0)	7 (50.0)	14
	2-004 (Phase I)	5 ( 45.5)	6 (54.5)	11
	2-004 (Phase II) - estimated	4 ( 51.9)	37 (48.1)	77
	2-006 - estimated	30 (100.0)		30
	2-007	8 ( 47.1)	9 (52.9)	17
	Total	99 (62.7)	59 (37.3)	158
>= 65	2-002	16 (100.0)		16
	2-003	10 ( 66.7)	5 (33.3)	15
	2-004 (Phase I)	2 ( 40.0)	3 (60.0)	5
	2-004 (Phase II) - estimated			
	2-006 - estimated	93 (100.0)		93
	2-007	3 ( 60.0)	2 (40.0)	5
	Total	124 (85.6)	27 (14.4)	151

Cut off date is Jan 2013

Path: Drug\_Tasks\DSUR\Primary\TLF\Pgm\T\_TAB3.sas

OutputID: T\_4a 01FEB2013 16:12

**Estimated=Blinded** studies were allocated to 'random dummy' arm

# Implementation in Biostatistics Department

Type of Outputs to be Provided – Examples / Templates



**Table 4b. Cumulative Subject Exposure to IMP from Ongoing and Completed Trials by Racial Group**

Race	Study ID	Number of Subjects
White	IMP 002	26
	IMP 003	46
	IMP 004 (Phase I)	31
	IMP 004 (Phase II) - estimated	16
	IMP 006 - estimated	116
	Total	335
Black or African American	IMP 006 - estimated	5
	Total	5
Asian	IMP 007	27
	IMP 004 (Phase II) - estimated	1
	Total	28
Native Hawaiian or other Pacific Islander	IMP 006 - estimated	1
	Total	1
Other	IMP 004 (Phase II) - estimated	2
	IMP 006 - estimated	1
	Total	3

Cut off date is Jan 2013

Path: Drug\_Tasks\DSUR\Primary\TLF\Pgm\T\_TAB4.sas

OutputID: T 4b 01FEB2013 16:14

# Implementation in Biostatistics Department

Type of Outputs to be Provided – Example / Templates



**Table R2b. List of treatment emergent death during the reporting period**

Study ID	Subject ID	Treatment Group	Last Dose Date	Date of death	Cause of death/ Adverse event leading to death (MedDRA Preferred Term)
-003 (Phase II)	001-3003	1000 mg q2w	09JUL2012	26AUG2012	Disease progression
	01-3006	1000 mg q2w	03SEP2012	01OCT2012	Disease progression
	01-1006	Blinded*	19SEP2012	29OCT2012	Disease progression / Asthenia
	02-1013	Blinded*	07AUG2012	18SEP2012	Disease progression / Disease progression

Reporting period: 24 \* 1 2012 - 23 \* 1 2013

\*Trial team blinded to treatment group to keep the integrity of the study. SoC=Standard of Care

Adverse Events reported using MedDRA Version 15.0

Path: \Drug\_Tasks\DSUR\Primary\TLFPgm\L\_LIST2.sas

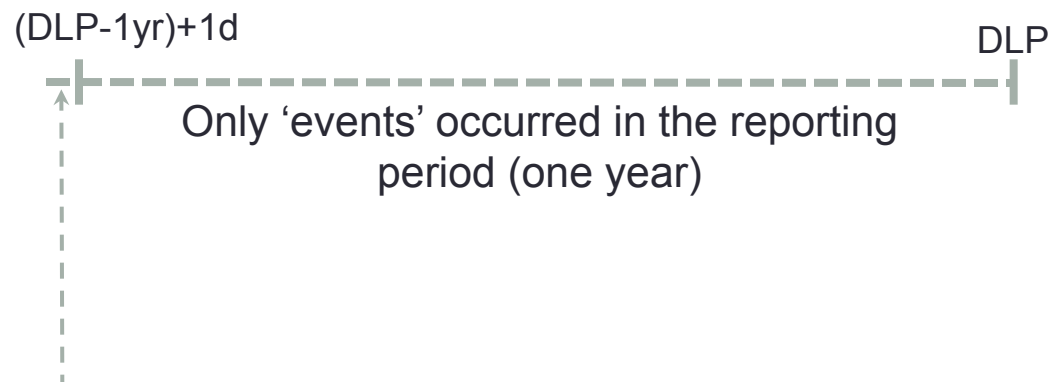
OutputID: L\_R2b 01FEB2013 16:09

Clear definition / rule to identify death if death form is not available e.g. AE with fatal outcome

# Implementation in Biostatistics Department

Type of Outputs to be Provided – Example / Templates

By-Period Outputs - Filtering for new «events» or events not yet in db at the time of previous DSUR



- Some «events» (Drop-outs or deaths) may be **not in db at the time of db extract**
- A new «event» is considered new if:
  - Occurred in the **current** DSUR reporting period
  - **Not in db** at the time of previous DSUR





# Implementation in Biostatistics Department

## Type of Outputs to be Provided – Example / Templates



**Table COMPLIANCE1. Subject compliance to study drug in the reporting period  
By Study and Treatment**

Study Identifier	Treatment	Investigational Arm		Control Arm	
		N. of Administration	% of Compliant Administration	N. of Administration	% of Compliant Administration
TFC01-003	10 mg q2w	12	100.0%		
	1000 mg q2w	34	100.0%		
FMP01-004 (Phase II)	SoC ( ) - estimated			35	93.7%
	500 mg q2w + SoC - estimated	153	93.3%		
	1000 mg q2w + SoC - estimated	35	88.8%		
E01-006	Placebo + SoC ( ) - estimated			385	95.8%
	750 mg q3w + SoC - estimated	122	94.6%		
	500 mg q3w + SoC - estimated	313	94.6%		
	1500 mg q3w Open Label*	82	91.5%		
F01-007	1000 mg q2w	27	96.3%		
	1500 mg q2w	22	100.0%		

Reporting period: Jan 2012 - Jan 2013

\* Subjects crossing over to experimental treatment after experiencing disease progression.

Path: \Drug\_Tasks\DSUR\Primary\TLF\Pgm\T\_TAB7.sas

OutputID: T\_COMPLIANCE1 01FEB2013 16:16

- Additional outputs for compliance
- The way compliance is described depends on the indication and type of therapy
- **Estimated=Blinded** studies were allocated to 'random dummy' arm

# Implementation in Biostatistics Department

## Case 1 – Late Stage Development Project



- An oncology IMP with active ph 2/3 Trials
  - 18 ongoing/closed trials
  - SDTM available for all trials
  - Because of several SDTM studies managed by the same CRO, cut-off and therefore reporting period was cut by one week
- Reports provided by
  - Indications: NSCLC, Breast, Pancreatic Cancer
  - Type of Combination: Monotherapy, Combination Therapy 1, Combination Therapy 2
- Identification of Adverse Events of Special Interest

Data mapping approach option 1 was used

# Implementation in Biostatistics Department

## Case 2 – Early Stage Development Project



### ■ Only ph 1/2 Trials

- 6 ongoing/closed trials
- SDTM not available for all trials
- Data Harmonisation entirely performed in ADaM
- Healthy volunteers ph 1 not included but reported separately

### ■ Reports provided by

- Dose level of the sponsor IMP

### ■ Blinded studies

- A dummy randomisation arm was used

Data mapping approach option 3 was used

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# Conclusions

- The new DSUR ICH guidance requires more information / effort than its predecessors
- The new process can be challenging as it requires involvement of several functions and definition of a clear centrally coordinated process
- Use of CDISC principles facilitate harmonisation / data-integration. The DSUR can be seen as a 'pilot' for data integration of a medical product
- SDTM delivery may delay / change internal timeline
- Once implemented it is «easy» to repeat (subsequent DSURs)

# References & Acknowledgments

Development Safety Update Report E2F, Step 4 Version 17 August 2010  
(<http://www.ich.org/products/guidelines/efficacy/efficacy-single/article/development-safety-update-report.html>)

Adapt and Survive: Implementing the new ICH Development Safety Update Report (DSUR) - P.Gerend R.Sharma – PharmaSUG 2012

# Questions



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# Backup Slides



# Background and Overview of the new ICH Guidance

## Background – US IND vs EU Annual Safety Report

<b>US-IND</b> Based on the IND anniversary date (DIBD) of the IMP	<b>EU-ASR</b> Based on the first authorization of a clinical trial of an IMP by authority in any EU member state
Benefit-risk assessment (Cumulative data from DIBD) Indication	Progress Report (Period under review) Molecule
Annual	Annual or on request
FDA	EU member state authorities Independent Ethics Committees
All SAEs	All Serious ARs
Narrative or Tabular summary of most frequent AEs List of deaths and drop-outs List completed/Non-Completed studies	Coincise global analysis All new and relevant findings in the period

# Implications for data management / biometrics departments



## Use of CDISC Principles – Standard Corporate ADaM requirements for DSUR - ADSL

Derived Dataset Name	Variable Name	Variable Label
ADSL	STUDYID	Study Identifier
ADSL	USUBJID	Unique Subject Identifier
ADSL	ARM(N)	Description of Planned Arm
ADSL	AARM(N)	Description of Analysis Arm
ADSL	TRT01P(N)	Planned Treatment
ADSL	TRT01A(N)	Actual Treatment
ADSL	TRTSDT	First dose date
ADSL	TRTEDT	Last dose date
ADSL	SAFFL	Safety Population Flag
ADSL	SEX(N)	Sex
ADSL	BRTHTDT	Birth Date
ADSL	AGE	Age
ADSL	AGEU	Age Units
ADSL	AGEGR1(N)	Pooled Age Group 1
ADSL	RACE(N)	Race
ADSL	_INDICATION	Study Indication
ADSL	_STDYSTFL	Study Status Flag
ADSL	RANDDT	Date of randomization
ADSL	COUNTRY	Country
ADSL	DTHDT	Date of Death*
ADSL	DTHREAS	Cause of Death/Adverse event leading to death (MedDRA Preferred Term) **
ADSL	ESSTAT(N)	End of Study Status
ADSL	ESDREAS	Reason for Study Discontinuation
ADSL	ESDDT	Study Discontinuation Date
ADSL	EXDOSE	Cumulative Actual Dose of Study Drug
ADSL	EXPLDOSE	Cumulative Planned Dose of Study Drug
ADSL	EXCOMPL	Compliance of Study Drug
ADSL	EXYRS	Exposure in Years

### Notes to programmer:

•If no Death page is available, but AE/SAE with outcome “fatal” are present in the data base, the DTHDT should be derived based on AE start/end dates

•\*\* If no Death page is available, but AE/SAE with outcome “fatal” are present in the data base, the DTHREAS should be derived as AE MedDRA Preferred Term

•Variables STUDYIDN: “Study Identifier (N)”, STRFR1 “Stratification Factor 1”, STRFR1N “Stratification Factor 1 (N)” could be added into data set ADSL if required for programming of outputs

# Implications for data management / biometrics departments

## Use of CDISC Principles – Standard Corporate ADaM requirements for DSUR - ADAE

Derived Dataset Name	Variable Name	Variable Label
ADSL	STUDYID	Study Identifier
ADSL	USUBJID	Unique Subject Identifier
ADSL	ARM(N)	Description of Planned Arm
ADSL	TRT01P(N)	Planned Treatment
ADSL	TRT01A(N)	Actual Treatment
ADSL	TRTSDT	First dose date
ADSL	TRTEDT	Last dose date
ADAE	AESTDT	Adverse Event Start Date
ADAE	AESTDTC	Adverse Event Start Date
ADAE	AEENDT	Adverse Event End Date
ADAE	AEENDTC	Adverse Event End Date
ADAE	AEDECOD	Preferred Term
ADAE	AEBODSYS	Body System or Organ Class
ADAE	AETERM	Reported Term
ADAE	AEACT	Action Taken
ADAE	AEOUT	Outcome
ADAE	TRTEMFL	Treatment Emergent Flag
ADAE	AESER	Serious Adverse Event
ADAE	AESEV	Severity of AE
ADAE	_MEDDRAN	<u>MedDRA</u> Version