

Specifications for Preparing and Submitting Electronic ICSRs and ICSR Attachments

Technical Specifications Document

Associated Guidance Documents and Conformance Guide:

**Draft Guidance for Industry: Providing Submissions in Electronic Format –
Postmarketing Safety Reports (June 2014)**

**Guidance for Industry and FDA Staff: Postmarketing Safety Reporting for
Combination Products (July 2019)**

**Draft Guidance for Industry: Providing Regulatory Submissions in
Electronic Format: IND Safety Reports (September 2019)**

**Electronic Submissions of IND Safety Reports Technical Conformance Guide
(September 2019)**

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**U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)
Center for Biologics Evaluation and Research (CBER)**

February 2020

Specifications for Preparing and Submitting Electronic ICSRs and ICSR Attachments

Revision History Table

Date	Version	Summary of Changes
2008-06-11	1.0	Initial Version
2008-08-06	1.1	Added Filename format information
2008-10-10	1.2	Updated UTF-8 to ISO-8859-1 encoding; indicated simultaneous acceptance of ICSR and ICSR attachments; provided another acceptable file extension for SGML files; and clarified use of abbreviations (NDA, ANDA, and STN)
2008-10-22	1.3	Provided clarification in Section II; updated footnote 3; and added new paragraph to Section V.C.
2013-07-05	1.4	Updated AERS to FAERS migration changes, removed references to SGML file formatting, incorporated updates from CBER
2018-02-06	1.5	Added a new section to highlight data fields for reporting ICSRs on Combination Products
2019-09-30	1.6	Added two new sections to provide regional data elements for electronic submissions of certain IND safety reports (section I) and BA/BE studies not conducted under an IND (section J). Added an appendix (II) highlighting various case scenarios for electronic submissions of IND safety reports to FAERS.

2020-02-11	1.7	<p>Added a new value to the data element B.4.k.1 for drug characterization to accommodate a similar device.</p> <p>Updated the data element B.4.k.18.2 to specify values.</p> <p>Updated the data element B.4.k.18.3 to use default value.</p>
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Specifications for Preparing and Submitting Electronic ICSRs and ICSR Attachments

Table of Contents

I. ELECTRONIC SUBMISSIONS OF ICSRS AND ICSR ATTACHMENTS	1
II. SUBMISSION FILE NAME.....	2
III. ICSR ACKNOWLEDGEMENTS.....	2
A. ESG ACKNOWLEDGEMENT	2
B. FAERS ACKNOWLEDGMENT	2
IV. ELECTRONIC TRANSPORT FORMAT: XML FILES	2
A. AS2 HEADERS AND ROUTING IDS FOR POSTMARKETING SAFETY REPORT SUBMISSIONS.....	3
B. AS2 HEADERS AND ROUTING IDS FOR PREMARKETING SAFETY REPORT SUBMISSIONS	3
C. XML HEADER	4
D. ICSR MESSAGE HEADER INFORMATION	4
E. ICSR FILE EXTENSION.....	4
V. DATA ELEMENTS FOR ELECTRONIC SUBMISSIONS	5
A. MINIMUM DATA ELEMENTS REQUIREMENTS	5
B. ADMINISTRATIVE AND IDENTIFICATION ELEMENTS	5
C. AUTHORIZATION/ APPLICATION NUMBER FORMAT	6
D. UNIQUE CASE IDENTIFICATION NUMBERS FOR INITIAL AND FOLLOW-UP ICSRS	7
E. MEDDRA SPECIFIC ELEMENTS.....	7
1. <i>Reaction/Event</i>	8
2. <i>Other E2B Elements</i>	8
F. DRUG DESCRIPTION AND CASE NARRATIVE ELEMENTS	9
1. <i>Recording Multiple Drugs</i>	9
2. <i>Medicinal Product Name and Active Drug Substance Name</i>	9
3. <i>Case Narrative</i>	10
G. OTHER DATA ELEMENTS	10
1. <i>Dosage Information Field</i>	10
2. <i>Pharmaceutical Form Field</i>	10
3. <i>Route of Administration Field</i>	10
4. <i>Receiver Field (A.3.2)</i>	10
5. <i>Message Receiver Field (M.1.6)</i>	11
H. DATA ELEMENTS FOR ELECTRONIC SUBMISSIONS OF SAFETY REPORTS FOR POSTMARKETING COMBINATION PRODUCTS	12

I.	DATA ELEMENTS FOR ELECTRONIC SUBMISSIONS OF IND SAFETY REPORTS	22
J.	DATA ELEMENTS FOR ELECTRONIC SUBMISSIONS OF ICSRs FROM BIOAVAILABILITY/ BIOEQUIVALENCE (BA/BE) STUDIES NOT CONDUCTED UNDER AN IND.....	29
VI.	ELECTRONIC FORMAT FOR ICSR ATTACHMENTS.....	32
A.	CONVERTING THE ICSR ATTACHMENT TO PDF	32
B.	IDENTIFICATION INFORMATION IN THE PDF DOCUMENT INFORMATION FIELDS.....	32
APPENDIX I. EXAMPLES OF CORRECT AND INCORRECT APPLICATION NUMBER AND DRUG ELEMENT FORMATS		34
APPENDIX II. CASE SCENARIOS FOR IND SAFETY REPORTS SUBMITTED TO FAERS		36

List of Tables

Table 1.	Minimum Data Elements	5
Table 2.	Detailed Description of Administrative Tags*	6
Table 3.	Detailed Description of Application Number Formats.....	7
Table 4.	Additional E2B Elements for Preferred MedDRA Coding	8
Table 5.	Detailed Description of Drug(s) and Narrative Elements ^{*†}	9
Table 6.	Receiver Information	11
Table 7.	Combination Product Elements	12
Table 8.	Investigational New Drug Clinical Data Elements	22
Table 9.	Data Elements for BA/BE Studies Not Conducted Under an IND.....	29
Table 10.	Document Information Fields in ICSR Attachments.....	33

Specifications for Preparing and Submitting Electronic ICSRs and ICSR Attachments

This document provides current specifications for submitting individual case safety reports (ICSRs) and ICSR attachments in electronic form. The specifications apply to electronic submission of ICSRs for drug and biological products, studied under an investigational new drug application (IND); ICSRs from bioavailability/bioequivalence (BA/BE) studies conducted without an IND, and ICSRs for marketed drug and biological products and combination products to the FDA Adverse Event Reporting System (FAERS). The specifications do not apply to the following marketed biological products: prophylactic vaccines, whole blood or components of whole blood, human cells, tissues, and cellular and tissue-based products (HCT/Ps) regulated by FDA.

This document discusses the technical specifications for electronic submission of ICSRs and ICSR attachments through the FDA Electronic Submissions Gateway (ESG).¹ ICSRs (and any ICSR attachments) are to be prepared in accordance with the International Council for Harmonisation (ICH) E2B(R2) data elements in extensible markup language (XML) file format for compatibility with the FAERS database. ICSRs for marketed products should not be submitted to the electronic Common Technical Document (eCTD).²

If you have not previously submitted an ICSR in electronic format to FAERS, you should contact the FAERS electronic submission coordinator at faersesub@fda.hhs.gov and they will assist you with submission of a test file.

I. ELECTRONIC SUBMISSIONS OF ICSRS AND ICSR ATTACHMENTS

Each initial ICSR or follow-up ICSR may consist of structured information and non-structured information, such as ICSR attachments.

For the FDA to process, review, and archive the ICSRs, prepare your ICSRs for electronic submission by following these steps:

- Provide a unique filename for the submission; see section II of this document.
- Add a file header and file extension; see section IV of this document.
- Populate the elements of the ICSR file; see section V of this document.

¹ For information on providing submissions using the ESG, refer to <https://www.fda.gov/ForIndustry/ElectronicSubmissionsGateway/default.htm>.

² See FAERS Electronic Submissions at <https://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Surveillance/AdverseDrugEffects/ucm115894.htm>.

- If applicable, add ICSR attachments to ICSRs; see section VI of this document.

II. SUBMISSION FILE NAME

Each electronic submission of ICSRs or attachments to ICSRs must have a unique filename (e.g., your named file + date and time stamp down to the second: filenameYYYYMMDDHHMMSS). You may choose your own format to maintain uniqueness.

III. ICSR ACKNOWLEDGEMENTS

A. ESG Acknowledgement

After submitting an ICSR or ICSR attachment, you should receive an ESG message delivery notice (MDN) notifying the sender of the receipt of their submission, but not acknowledging the acceptance of the submission. If the MDN is not received within 2 hours, go to the [ESG System Status](#) web page. If the ESG web page is non-operational, go to the [ESG Home Page](#) for further information.

B. FAERS Acknowledgment

The MDN is then followed by a FAERS acknowledgment within 2 hours of the ESG acknowledgement. The FAERS acknowledgement notifies the sender whether their submission has been processed. If you do not receive the FAERS acknowledgement, resubmit the ICSRs without changing the filename.

If you receive a report acknowledgement code 02, indicating that your submission did not process due to file error/s that are specified in the acknowledgment, then proceed as follows:

- For submission with a single ICSR, resubmit the corrected ICSR with a new unique filename.
- For a submission consisting of multiple ICSRs, if one or more ICSRs in the submission failed to process, separate those ICSRs from the processed ICSRs, correct them and resubmit only the corrected ICSRs as a new submission with a unique filename. For example, if there were 50 ICSRs in an original submission and 15 of them failed to process, then only those 15 ICSRs must be separated, corrected appropriately, and resubmitted with a new unique filename. The resubmission should not contain any of the previously processed ICSRs.

IV. ELECTRONIC TRANSPORT FORMAT: XML FILES

FDA accepts the data elements defined in the “Guidance for Industry E2BM Data Elements for

Transmission of Individual Case Safety Reports (April 2002).”³ The ICH E2B(R2) guidance provides additional information and clarification of the previously issued guidances.⁴

The electronic transport format also known as the Document Type Definition (DTD) for XML files is described in the associated document “XML Formatted DTD” (DTD Version 2.1 and DTD Version 2.2) (see links to both documents below in section C).

A. AS2 Headers and Routing IDs for Postmarketing Safety Report Submissions

For postmarketing safety report submissions, the sponsors should include the unique AS2 headers or routing IDs for safety reports and attachments in one of the two ways listed below.

- AS2 Headers
 - Destination: “CDER”
 - XML files: AERS
 - PDF’s: AERS_ATTACHMENTS

or

- Routing IDs
 - XML files: FDA_AERS
 - PDF’s: FDA_AERS_ATTACHMENTS

B. AS2 Headers and Routing IDs for Premarketing ⁵ Safety Report Submissions

For premarketing safety report submissions, the sponsors should include the unique AS2 headers or routing IDs for premarketing safety reports and attachments as listed below to differentiate these reports from post-marketing ICSRs.

- AS2 Headers

³ For information on Guidance for Industry on E2BM Data Elements for Transmission of Individual Case Safety Reports, please refer to the following:

<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM073092.pdf>.

⁴ See the guidance for industry entitled *E2B Data Elements for Transmission of Individual Case Safety Reports* (January 1998) (E2B). FDA currently supports use of E2B data elements in addition to the E2BM data elements. However, it is preferred that ICSRs be submitted with E2BM data elements to allow for the most efficient processing of the submissions. For those who wish to use E2B data elements and the corresponding electronic transport format (ICH M2 Electronic Transmission of Individual Case Safety Reports Message Specification Final Version 2.3 Document Revision February 1, 2001 (ICH ICSR DTD Version 2.1)), please refer to documentation provided at <https://www.fda.gov/downloads/drugs/ucm149932.pdf>

⁵ The term premarketing safety report refers to IND safety reports and BA/BE studies safety reports.

- Destination: “CDER”
- XML files: AERS_PREMKT
- PDF’s: AERS_ATTACHMENTS_PREMKT

or

- Routing IDs
- XML files: FDA_AERS_PREMKT
- PDF’s: FDA_AERS_ATTACHMENTS_PREMKT

C. XML Header

The addition of an XML header enables FDA to process ICSRs in an XML format successfully. FDA supports only the ISO-8859-1 character set for encoding the submissions.

- For submissions of safety reports for drug and biological products, add the following XML header to the ICSR file:

```
<?xml version="1.0" encoding="ISO-8859-1"?>
```

```
<!DOCTYPE ichicsr SYSTEM "https://www.accessdata.fda.gov/xml/icsr-xml-v2.1.dtd">
```

- For submissions of safety reports for combination products, add the following XML header to the ICSR file:

```
<?xml version="1.0" encoding="ISO-8859-1"?>
```

```
<!DOCTYPE ichicsr SYSTEM "https://www.accessdata.fda.gov/xml/icsr-xml-v2.2.dtd">
```

D. ICSR Message Header Information

For submissions of combination product safety reports use the value “2.2” for the DTD Descriptor <messageformatversion>

```
<messageformatversion>2.2</messageformatversion>
```

E. ICSR File Extension

Use “xml” as the file extension for ICSRs in XML format. The name of the file should be 200 characters or less, excluding the three-digit extension. FDA does not support file names with multiple periods “.” or the use of any special or foreign characters except underscore “_” and dash “-”.

V. DATA ELEMENTS FOR ELECTRONIC SUBMISSIONS

A. Minimum Data Elements Requirements

For a submission to be successfully processed, submit an ICSR with the minimum data elements for reporting that are appropriate for the product type. If a sponsor submits an ICSR without the minimum data elements, they will receive a FAERS acknowledgement code 02 stating that the submission was not processed (see section III.B above). The minimum data elements for reporting are provided in Table 1 and the bullets that follow, list the data elements to include in an ICSR by product type.

Table 1. Minimum Data Elements

Element	Data
B.1	Identifiable Patient
A.2	Identifiable Reporter
B.2	Reaction or Event
B.4	Suspect Drug Product

- Adverse event reports submitted for unapproved prescription drug products, unapproved nonprescription drug products and products approved for marketing under an abbreviated new drug application (ANDA), biologics license application (BLA), or new drug application (NDA), including combination products should have, at a minimum, the four data elements listed in Table 1.
- Adverse event reports for compounded drugs submitted by registered outsourcing facilities should have at a minimum, a suspect product and an adverse event.
- IND safety reports should include, at a minimum, the four data elements listed in Table 1 and the IND number under which the clinical trial where the event occurred is conducted.

B. Administrative and Identification Elements

For FDA to successfully process your electronic ICSR submissions, populate the administrative and identification elements as indicated in Table 2.

Table 2. Detailed Description of Administrative Tags*

Element	DTD Descriptor 2.1	Length	Element Values for DTD 2.1
A.1.9	<fulfillexpeditecriteria>	1N	1= Yes (15-Day expedited) 2= No (non-expedited) 4= 5-Day 5= 30-Day 6= 7-Day expedited
A.1.0.1	<safetyreportid>	100AN	Sender's (Case) Safety Report Unique Identifier [†]
A.1.10.1	<authoritynumb>	100AN	Regulatory authority's case report number
A.1.10.2	<companynumb>	100AN	Other sender's case report number
A.3.1.2	<senderorganization>	60AN	Sender identifier
A.2.3.2 [^]	<sponsorstudynumb>	35AN	IND number under which the clinical trial where the event occurred is conducted

*Include either <companynumb> or <authoritynumb> values. FDA cannot process the ICSR without one of these element values.

[†]The Sender's Safety Report Unique Identifier is comparable to the Manufacturer Report Number (also referred to as the Manufacturer Control Number (MCN)) provided on paper in FDA Form 3500A. This number is the company's unique case identification number, which is used for the life of the case.

[^]For IND safety reports only.

C. Authorization/ Application Number Format

In the section designated for drug and biological products information, use the following format for the "Authorization/ Application Number" element (B.4.k.4.1) <drugauthorizationnumb> as indicated in Table 3 and described below.

- For approved drug and biological products marketed under an approved application, include the acronym "NDA" or "ANDA," followed by a space and then the number for the application (e.g., NDA 012345, ANDA 012345). For prescription drug products marketed without an approved application (Rx No Application), use "000000." For a nonprescription drug product marketed without an approved application (Non-Rx No Application), use "999999." For adverse event reports for compounded drug products submitted by registered outsourcing facilities, use "COMP99."
- For marketed biological products, include the appropriate acronym "BLA," "STN," or "PLA" followed by a space and the primary six-digit number (e.g., STN 123456).
- For adverse event reports arising from BA/BE studies conducted to support approval of an ANDA, include the acronym "PANDA" followed by a space and then the number for the application (same number used for the submitted ANDA).

Table 3. Detailed Description of Application Number Formats

Type of Application	Recommended Format
NDA/ ANDA	NDA, ANDA 012345
STN/ BLA/ PLA	STN or BLA or PLA 123456
Pre-Submission ANDA	Pre-ANDA 012345
Rx No Application	000000
Non-Rx No Application	999999
Compounded Products	COMP99

D. Unique Case Identification Numbers for Initial and Follow-Up ICSRs

For the follow up ICSR safety reports to be correctly linked to your initial ICSR report, follow these steps:

- Use the same <safetyreportid> for the E2BM elements in section A.1.0.1 for the initial ICSR and any of its follow-up ICSRs; this allows the follow-up report to be linked to the initial report in the FAERS database.
- If the initial ICSR was submitted on paper but its follow-up ICSR is submitted electronically, include the Manufacturer Control Number (MCN) listed in Box G9 of the FDA paper Form 3500A from the initial report in both A.1.0.1 <safetyreportid> and in A.1.10.2 <companynumb> field in the follow-up electronic submission.
- Always use the <safetyreportid> that was assigned to the initial ICSR when submitting follow-up reports. If you need to change the <safetyreportid> internally, note the internally reassigned <safetyreportid> in the narrative section of the follow-up report (i.e., element B.5.1) (e.g., “This ICSR has been reassigned to the Company ID number COA12345”). Do not use the internally reassigned <safetyreportid> for any follow-up reports.
- In the event that an incorrect <safetyreportid> has been used in a follow-up report, contact the FAERS electronic submission coordinator at faersesub@fda.hhs.gov so that the follow-up ICSR can be matched to the initial ICSR.

E. MedDRA Specific Elements

Use the ICH Medical Dictionary for Regulatory Activities (MedDRA) to code medical

terminology.⁶ When possible, use the Lowest Level Term (LLT), and record the LLT as the MedDRA numeric code rather than the LLT name (e.g., the LLT name is Rash; the MedDRA numeric code for LLT Rash is 10378444).

1. Reaction/Event

a) Reaction/Event as reported by the primary source field

Record the original reporter’s words verbatim and/or use short phrases to describe the reaction/event in element (B.2.i.0).

b) Reaction/Event MedDRA Term LLT numeric code or text field

Record the MedDRA LLT that most closely corresponds to the term reported by the original reporter in element (B.2.i.1).

c) Reaction/Event MedDRA Preferred Term (PT) numeric code or text field

Record the MedDRA PT that most closely corresponds to the term reported by the original reporter in element (B.2.i.2).

2. Other E2B Elements

For the E2B elements listed in Table 4, use either MedDRA text or, preferably, the corresponding numeric code.

Table 4. Additional E2B Elements for Preferred MedDRA Coding

Element	DTD Descriptor 2.1	Length
B.1.7.1a.2	<patientepisodename>	250 AN
B.1.8f.2	<patientdrugindication>	250 AN
B.1.8g.2	<patientdrugreaction>	250 AN
B.1.9.2b	<patientdeathreport>	250 AN
B.1.9.4b	<patientdetermineautopsy>	250 AN
B.1.10.7.1a.2	<parentmedicalepisodename>	250 AN
B.1.10.8f.2	<parentdrugindication>	250 AN
B.1.10.8g.2	<parentdrugreaction>	250 AN
B.3.1c	<testname>	100 AN
B.4.k.11b	<drugindication>	250 AN
B.4.k.17.2b	<drugrecuraction>	250 AN
B.4.k.18.1b	<drugreactionasses>	250 AN
B.5.3b	<senderdiagnosis>	250 AN

⁶ Companies can license MedDRA from an international maintenance and support services organization (MSSO) (toll free number 877-258-8280; Direct 571-313-2574; fax 571-313-2345; e-mail MSSOhelp@mssotools.com).

F. Drug Description and Case Narrative Elements

To ensure the successful processing of your electronic ICSR submission, applicants are advised to populate the drug description and narrative elements as indicated in Table 5.

Table 5. Detailed Description of Drug(s) and Narrative Elements^{*†}

Element	DTD Descriptor 2.1	Length	Element Values for DTD 2.1
B.4.k.1	<drugcharacterization>	1N	1=Suspect 2=Concomitant 3=Interacting
B.4.k.2.1	<medicinalproduct>	70AN	Proprietary Medicinal Product Name
B.4.k.2.2	<activesubstancename>	100AN	Drug Substance Name
B.5.1	<narrativeincludeclinical>	20000AN	Case Narrative

*Include <medicinalproduct> and/or <activesubstancename>. FDA cannot process the ICSR without at least one of these elements.

†Appendix I lists various examples of correct drug element formats.

1. Recording Multiple Drugs

If you are submitting safety reports for products containing multiple drugs, you should follow these steps:

- List the proprietary drug product name in element (B.4.k.2.1) and/or list the drug substance name in element (B.4.k.2.2).
- List the characterization of each reported drug's role, such as suspect (primary, secondary), concomitant, or interacting in element (B.4.k.1).

2. Medicinal Product Name and Active Drug Substance Name

FDA validates medicinal product names to the available Structured Product Labeling (SPL),⁷ the submitted label (as ICSR attachment), and the Substance Registration System (SRS). These are further described below:

- When the product has an SPL, use the same naming convention as it appears in the SPL when submitting the ICSR.

⁷ The SPL is a document markup standard approved by Health Level Seven (HL7) and adopted by FDA as a mechanism for exchanging product and facility information. See <https://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm>.

- When submitting a product label as an attachment to an ICSR, use the name as it appears on the submitted product label.
- If no medicinal product is named and only the active substance is named, use the name of the active substance as it appears in the SRS.⁸

3. Case Narrative

a) Initial ICSR

Record all case narrative information including clinical course, therapeutic measures, outcome, and all additional relevant information in element (B.5.1). If the information exceeds the field length, consider describing the information using fewer words. Although the use of only the most widely used medical abbreviations is permissible if necessary, their use should be limited when possible.

b) Follow-up ICSR

Record both new information and corrections to previously submitted ICSRs in element (B.5.1).

G. Other Data Elements

1. Dosage Information Field

If dosage information cannot be captured in the structured fields in B.4.k.5, then use the element (B.4.k.6) <drugdosagetext>.

2. Pharmaceutical Form Field

Record the pharmaceutical form in element (B.4.k.7) <drugdosageform>. FDA accepts the European Medicines Agency (EMA) dosage codes or text.⁹

3. Route of Administration Field

Code the route of administration in element (B.4.k.8) <drugadministrationroute> as described in the ICH E2B(R2) guidance.

4. Receiver Field (A.3.2)

Complete the receiver using the code or text listed in Table 6.

⁸ <https://www.fda.gov/ForIndustry/DataStandards/SubstanceRegistrationSystem-UniqueIngredientIdentifierUNII/default.htm>.

⁹ For a complete list of EMA dosage form codes and text, please refer to https://www.ema.europa.eu/documents/other/list-pharmaceutical-dosage-forms_en.xls

Table 6. Receiver Information

Element	DTD Descriptor 2.1	Code or Text
A.3.2.1	<receivertype>	2
A.3.2.2a	<receiverorganization>	FDA
A.3.2.2b	<receiverdepartment>	Office of Surveillance and Epidemiology
A.3.2.2d	<receivergivenname>	FAERS
A.3.2.3a	<receiverstreetaddress>	10903 New Hampshire Avenue
A.3.2.3b	<receivercity>	Silver Spring
A.3.2.3c	<receiverstate>	MD
A.3.2.3d	<receiverpostcode>	20993
A.3.2.3e	<receivercountrycode>	US
A.3.2.3l	<receiveremailaddress>	faersesub@fda.hhs.gov

5. Message Receiver Field (M.1.6)

The following two message receiver identifiers are used by FDA to distinguish between test and production submissions:

- Test ICSRs: <messagereceiveridentifier>ZZFDATST</messagereceiveridentifier>
- Production ICSRs: <messagereceiveridentifier>ZZFDA</messagereceiveridentifier>

H. Data Elements for Electronic Submissions of Safety Reports for Postmarketing Combination Products

To ensure the successful processing of your electronic ICSR submission for a marketed drug- or therapeutic biologic led- combination product (e.g., a combination product containing a drug/biologics and device and marketed under an NDA or a BLA), you should populate the data elements indicated in Table 7.

Note: Some of the DTD descriptors listed in Table 7 are under existing E2B(R2) header elements, and some DTD descriptors are under new data elements. Those data element numbers that are new, have the word “FDA” incorporated into the number and are U.S.-specific regional elements related to reporting on combination products.

Table 7. Combination Product Elements

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
M.1.2	<messageformatversion>	Message Format Version	Version number of Message Format	3AN	2.2	Use value 2.2 if using icrsr-xml-v2.2.dtd Use value 2.1 if using icrsr-xml-v2.1.dtd
A.1	<safetyreport>	Header/ Entity	Identification of the case safety report			
A.1.9	<fulfillexpeditecriteria>	Does this case fulfill the local criteria for an expedited report		1N	1=Yes 2=No 4=5-Day 5=30-Day	Element values= 1 for 15-Day Expedited* and 2 for periodic non-expedited† Element value= 4 for remedial action to prevent an unreasonable risk of substantial harm to the public health Element value= 5 for malfunction with no associated

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
						adverse event Do not use element value of 3.
A.1.FDA.15	<combinationproductreport>	Combination Product Report Flag	Combination Product Report Flag	1N	1=Yes 2=No	
A.2	<primarysource>	Primary source(s) of information	Header/ Entity		Area below should be a repeatable block	
A.2.1		Primary source(s)	Header			
A.2.1.3.FDA.4	<reporteremailaddress>	Reporter's Email Address		100AN		
B.1.1	<patientinitial>	Patient	Patient Identifier	10AN		If a single report is reported for a malfunction with no adverse event, the element value should be "NONE." If there are multiple malfunction reports with no adverse event, then the element value should be "SUMMARY."
B.4	<drug>	Drug(s) Information	Header/ Entity		Area below should be a repeatable block	
B.4.k.1	<drugcharacterization>	Characterization of drug role		1N	1=Suspect 2=Concomitant 3=Interacting 5=Similar	If the product in the report is about a similar device, the element value should be 5=Similar Device.

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
					Device	
B.4.k.2		Drug Identification	Header			
B.4.k.2.4.FDA.1a	<expirationdateformat>	Expiration date format	Product Expiration date	3N	102=CCYYMM DD 610=CCYYMM 602=CCYY	
B.4.k.2.4.FDA.1b	<expirationdate>	Expiration date	Product Expiration date	8N		
B.4.k.2.FDA.5	<productavailableforevaluation>	Product available for evaluation	Indicate whether product is available for evaluation	1N	1=Yes 2=No 3=Return	
B.4.k.2.6.FDA.1a	<productreturndateformat>	Product return date format	Date Format	3N	102=CCYYMM DD 610=CCYYMM 602=CCYY	
B.4.k.2.6.FDA.1b	<productreturndate>	Product return date	Date when Product was returned	8N		
B.4.k.20.FDA.1	<brandname>	Brand Name	The trade or proprietary name of the device constituent part of the suspect combination product as used in product labeling or in the catalog	80AN		At least one of the 3 must be reported <brandname> or <commondevicename> or <productcode> for the device constituent part
B.4.k.20.FDA.2	<commondevicename>	Common	Generic or	80AN		At least one of the 3 must be

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
		Device Name	common name of the device constituent part of the suspect combination product or a generally descriptive name			reported <brandname> or <commondevicename> or <productcode> for device constituent part
B.4.k.20.FDA.3	<productcode>	Product Code	Product code assigned to the device constituent part based upon the medical device product classification	3AN	http://www.accessdata.fda.gov/premarket/ftparea/foiclass.zip	At least one of the 3 must be reported <brandname> or <commondevicename> or <productcode> for device constituent part
B.4.k.20.FDA.4	<manufacturer>	Manufacturer	Header/ Entity			
B.4.k.20.FDA.4a	<manufacturername>	Device Manufacturer Name	Manufacturer name of the device constituent part of the suspect combination product	100AN		
B.4.k.20.FDA.4b	<manufactureraddress>	Manufacturer Address	Manufacturer address of the device constituent part of the suspect combination product	100AN		

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
B.4.k.20.FDA.4c	<manufacturercity>	Manufacturer City	Manufacturer city of the device constituent part of the suspect combination product	35AN		
B.4.k.20.FDA.4d	<manufacturerstate>	Manufacturer State	Manufacturer state of the device constituent part of the suspect combination product	40AN		
B.4.k.20.FDA.4e	<manufacturercountry>	Manufacturer Country	Manufacturer country of the device constituent part of the suspect combination product	2AN	ISO3166	
B.4.k.20.FDA.5	<modelnumber>	Model Number	Model number of the device constituent part	30AN		
B.4.k.20.FDA.6	<catalognumber>	Catalog Number	Catalog number of the device constituent part	30AN		
B.4.k.20.FDA.7	<serialnumber>	Serial Number	Serial number of the device constituent part	30AN		
B.4.k.20.FDA.8	<udinumber>	Unique Identifier	Unique identifier of the device	50AN		

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
		UDI#	constituent part			
B.4.k.20.FDA.9a	<dateimplantedformat>	Device Implant Date Format	Date format of device implant in the patient	3N	102=CCYYMM DD 610=CCYYMM 602=CCYY	For medical devices that are implanted in the patient, provide the implant date or best estimate. If day is unknown, month and year are acceptable. If month and day are unknown, year is acceptable
B.4.k.20.FDA.9b	<dateimplanted>	Device Implant Date	Date of device implant in the patient	8N		For medical devices that are implanted in the patient, provide the implant date or best estimate. If day is unknown, month and year are acceptable. If month and day are unknown, year is acceptable
B.4.k.20.FDA.10a	<dateexplantedformat>	Device Explant Date Format	Date format of device explant from the patient	3N	102=CCYYMM DD 610=CCYYMM 602=CCYY	If an implanted device was removed from the patient, provide the explant date or best estimate. If day is unknown, month and year are acceptable. If month and day are unknown, year is acceptable
B.4.k.20.FDA.10b	<dateexplanted>	Device Explant Date	Date of device explant from the patient	8N		If an implanted device was removed from the patient, provide the explant date or best estimate. If day is unknown, month and year are acceptable. If month and day

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
						are unknown, year is acceptable
B.4.k.20.FDA.11a	<deviceage>	Approximate age of device/ product	Age of device constituent part	5N		
B.4.k.20.FDA.11b	<deviceageunit>	Approximate age unit of device/ product	Age unit of device constituent part	3N	800=Decade 801=Year 802=Month 803=Week 804=Day 805=Hour	
B.4.k.20.FDA.12	<labeledsingleusedevice>	Single Use Device	Indicate whether the device constituent part was labeled for single use or not	1N	1=Yes 2=No	
B.4.k.20.FDA.13a	<devicemanufacturedateformat>	Device Manufacture Date Format	Device Manufacture Date format	3N	102=CCYYMMDD 610=CCYYMM 602=CCYY	
B.4.k.20.FDA.13b	<devicemanufacturedate>	Device Manufacture Date	Device Manufacture Date	8N		
B.4.k.20.FDA.14		Remedial action initiated/ Remedial action taken for the product	Header			

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
B.4.k.20.FDA.14.1 a	<remedialactionrecall>	Recall	Recall initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 b	<remedialactionrepair>	Repair	Repair initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 c	<remedialactionreplace>	Replace	Replace initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 d	<remedialactionrelabel>	Relabeling	Relabeling initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 e	<remedialactionnotify>	Notification	Notification initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 f	<remedialactioninspection>	Inspection	Inspection initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 g	<remedialactionpatientmonitor>	Patient monitoring	Patient monitoring	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1 h	<remedialactionmodifyadjust>	Modification/ Adjustment	Modification/ Adjustment initiated	1N	1=Yes 2=No	
B.4.k.20.FDA.14.1i	<remedialactionother>	Other	Other Remedial Action initiated	75AN		
B.4.k.20.FDA.15	<deviceusage>	Device Usage	Indicate the use of the device constituent part of the suspect combination product	1N	1=Initial Use of Device 2=Reuse 3=Unknown	
B.4.k.20.FDA.16	<deviceotnumber>	Device Lot Number	Lot number of the device constituent part of the suspect combination product	35AN		

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
B.4.k.20.FDA.17	<malfunction>	Malfunction	Malfunction of product	1N	1=Yes 2=No	
B.4.k.20.FDA.18		Follow-up type	Header			
B.4.k.20.FDA.18.1 a	<followupcorrection>	Correction	Correction	1N	1=Yes 2=No	
B.4.k.20.FDA.18.1 b	<followupadditionalinfo>	Additional information	Additional information	1N	1=Yes 2=No	
B.4.k.20.FDA.18.1 c	<followupresponsetoFDA>	Response to FDA request	Response to FDA request	1N	1=Yes 2=No	
B.4.k.20.FDA.18.1 d	<followupdeviceevaluation>	Device Evaluation	Device Evaluation	1N	1=Yes 2=No	
B.4.k.20.FDA.19	<deviceproblemandevaluation>	Device Problem and evaluation codes	Header/ Entity		Area Below Should be a Repeatable Block	
B.4.k.20.FDA.19.1 a	<evaluationtype>	Evaluation Type	Type of problem and/or the evaluation	2N	01=Device Problem 02=Method 03=Result 04=Conclusion	
B.4.k.20.FDA.19.1 b	<evaluationvalue>	Evaluation Value	The FDA code value based on the respective evaluation type	6N		The value depends on the respective <evaluationtype> If <evaluationtype> = 01 --> https://www.fda.gov/media/109148/download If <evaluationtype> = 02 --> https://www.fda.gov/media/109189/download

Data Element	DTD Descriptor 2.2	Title	Description	Length	Element Values for DTD 2.2	Notes
						<p>If <evaluationtype> = 03 --> https://www.fda.gov/media/109205/download</p> <p>If <evaluationtype> = 04 --> https://www.fda.gov/media/109218/download</p>
B.4.k.20.FDA.20	<operatorofdevice>	Operator of the Device	Operator of the Device	100AN		Use the value “Health Professional” or “Lay User/Patient.” If none applicable, then specify the “Other” value

* 21 CFR 314.80(c)(1) and 600.80(c)(1) use the term “15-day Alert reports.” In the combination product PMSR final rule (21 CFR 4.101), these reports are defined as “Fifteen-day reports.”

† Periodic non-expedited ICSRs are the reports required under 21 CFR 314.80(c)(2)(ii)(B) and 21 CFR 600.80(c)(2)(ii)(B) for serious, expected and nonserious adverse drug experiences.

I. Data Elements for Electronic Submissions of IND Safety Reports

For successful processing of your electronic IND ICSR submission, you should populate the following data elements as described in Table 8.

Table 8. Investigational New Drug Clinical Data Elements

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
A.1.4	<reporttype>	Type of Report		1N	1=Spontaneous 2=Report from Study 3=Other 4=Not Available to Sender (unknown)	Element value= 2 for Report from Study
A.1.9	<fulfillexpeditecriteria>	Does this case fulfill the local criteria for an expedited report?		1N	1=Yes 2=No 4=5-Day 5=30-Day 6=7-Day	Element value=1 for 15-Day Expedited Element value= 6 for 7-Day Expedited
A.1.12	<linkreportnumb>	Identification Number of the report which is linked to this report		100AN		Used to link all individual cases (safetyreportid) that make up an IND Safety Report submitted as a result of an Aggregate Analysis as per 312.32(c)(1)(i)(C) or for several events

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
						submitted as per (312.32(c)(1)(i)(B)) when a Narrative Summary Report is provided, this field should be populated in the IND Safety Report that contains the Narrative Summary Report.
A.2.3.1	<studyname>	Study Name		100AN	Study ID_ \$Abbreviated Trial Name	The Study ID should be the same value used in the study tagging file format of the eCTD submission.
A.2.3.2	<sponsorstudynumb>	Sponsor Study Number		35AN	IND number under which the clinical trial where the event occurred is conducted Use the "Parent" IND number* for reports submitted from an Aggregate Analysis as per (312.32(c)(1)(i)(C)) or for several events	Populate this field with the Primary IND in the first block and repeat block A.2 with elements A.2.3.2 and A.2.3.3.as noted below with element value= 5 for sponsor's other INDs evaluating suspect product (where applicable) Include the acronym "IND" followed by a space and then the IND

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
					submitted as per (312.32(c)(1)(i)(B)), from trials conducted under more than one IND	number for the application (e.g. IND 123456) See Appendix II (Case Scenarios) for additional information on how to submit reports from sponsor's other INDs (Cross-reporting).
A.2.3.3	<observestudytype>	Study type in which the Reaction(s)/ Event(s) were observed		1N	1= Clinical Trials 2= Individual Patient Use (e.g., 'Compassionate Use' or 'Named Patient Basis') 3= Other Studies (e.g., Pharmacoepidemiology, Pharmacoeconomics, Intensive Monitoring) 4= Report from	Required if element value for A.1.4 is 2=Report from Study Repeat this field as needed with element value= 5 for each Cross-reported IND. The first block of this element in the report must not be 5. If element value 4 is chosen, then A.1.9= 1. See Appendix II (Case

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
					Aggregate Analysis as per 312.32(c)(1)(i)(C) or for several events submitted as per 312.32(c)(1)(i)(B) if a Narrative Summary Report is provided 5= Cross-reported IND Safety Report	Scenarios) for additional information on how to submit reports from an Aggregate Analysis.
B.1.1	<patientinitial>	Patient Identifier		10AN		For a report from an Aggregate Analysis as per 312.32(c)(1)(i)(C) or for several events submitted as per 312.32(c)(1)(i)(B) if a Narrative Summary Report is provided, the element value should be "AGGREGATE"
B.4.k.2.1	<medicinalproduct>	Proprietary Medicinal Product Name		70AN		For investigational drug and biological products without an established name (i.e. INN or USAN

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
						name), prior to submitting IND safety reports to FAERS, the sponsor should submit a clinical information amendment to the IND, listing the names of the active drug substance/s and the medicinal product as they will be reported in E2B file submissions. The names should fit within the established E2B character length limits. Use company product code if no established name, for multi-ingredient products, or if name exceeds character length
B.4.k.2.2	<activesubstancename>	Active Drug Substance Names		100AN		
B.4.k.18	<drugreactionrelatedness>	Relatedness of Drug to				For IND Safety Reports, at least one suspect

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
		Reaction/ Event				product should have relatedness of drug to reaction/ event
B.4.k.18.1a	<drugreactionassesmeddra version>	MedDRA Version for Reaction Assessed		8AN		
B.4.k.18.1b	<drugreactionasses>	Reaction Assessed		250AN		
B.4.k.18.2	<drugassessmentsource>	Source of Assessment		60AN		Use the value “Sponsor” or “Investigator”. Include sponsor and investigator assessment when reporting both in separate blocks
B.4.k.18.3	<drugassessmentmethod>	Method of Assessment		35AN		Use the value “FDA”.
B.4.k.18.4	<drugresult>	Result		35AN	1=Suspected 2=Not suspected	For IND Safety Reports, at least one suspect product should have relatedness of drug to reaction/ event
B.5.1	<narrativeincludeclinical>	Case Narrative Including Clinical		20,000 AN		FDA strongly encourages sponsors to construct narratives that fit within the ICH E2B character

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
		Course, Therapeutic Measures, Outcome, and Additional Relevant Information				<p>limit of 20,000 AN. If your narrative exceeds this limit, sponsors should include as much of the narrative as possible in this field and submit an ICSR attachment for any text that exceeds the character limit. Sponsors should not submit an ICSR attachment containing the entire narrative and leave the case narrative field empty.</p> <p>For reports from Aggregate Analysis as per 312.32(c)(1)(i)(C) or for several events submitted as per 312.32(c)(1)(i)(B) where PDF is attached, put “see attached Narrative Summary Report” in this field.</p>

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
B.5.4	<sendercomment>	Sender's Comments		2000 AN		Identification and analysis of previously submitted events (as required by 312.32(c)(1)) should be reported in this field.

* The "parent IND" is the IND under which clinical investigations were initiated in the United States. (If the drug is being evaluated in multiple INDs, this is generally the IND with the lowest number.) NOTE: This may not be the same as the first A.2.3.2 block if the drug is being evaluated under multiple INDs.

NOTE: See [FAERS Webpage](#) for case scenario examples for reporting IND safety reports (e.g., IND safety reports where the sponsor is evaluating suspect product under more than one IND, IND safety reports that are a result of an aggregate analysis, and IND safety reports with unapproved and approved drugs listed as suspect products).

J. Data Elements for Electronic Submissions of ICSRs from Bioavailability/ Bioequivalence (BA/BE) Studies Not Conducted Under an IND

For Successful processing of your electronic ICSRs submissions for a BA/BE study, not conducted under an IND, you should populate the following data elements as described in Table 9.

Table 9. Data Elements for BA/BE Studies Not Conducted Under an IND

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
A.1.4	<reporttype>	Type of Report		1N	1=Spontaneous 2=Report from Study 3=Other 4=Not Available to Sender (unknown)	Element value= 2 for Report from Study

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
A.1.9	<fulfillexpeditecriteria>	Does this Case Fulfill the Local Criteria for an Expedited Report?		1N	1=Yes 2=No 4=5-Day 5=30-Day 6=7-Day	Element value=1 for 15-Day Expedited Element value= 6 for 7-Day Expedited
A.2.3.1	<studyname>	Study Name		100AN	Abbreviated Trial Name	
A.2.3.2	<sponsorstudynumb>	Sponsor Study Number		35AN	Pre-ANDA number for the BA/BE Studies	Include the acronym "Pre-ANDA" followed by a space and then the ANDA number for the application (e.g. Pre-ANDA 123456)
A.2.3.3	<observestudytype>	Study Type in Which the Reaction(s)/ Event(s) were Observed		1N	1= Clinical Trials 2= Individual Patient Use (e.g., 'Compassionate Use' or 'Named Patient Basis') 3= Other Studies (e.g., Pharmacoepidemiology, Pharmacoeconomics, Intensive Monitoring) 4= Report from Aggregate Analysis as per 312.32(c)(1)(i)(C) or for	For BA/BE studies, value will always be "1" for clinical trials.

Data Element	DTD Descriptor 2.1	Title	Description	Field Length	Element Values for DTD 2.1	Notes
					Several Events Submitted as per 312.32(c)(1)(i)(B) if a Narrative Summary Report is Provided 5= Cross-Reported IND Safety Report	
B.4.k.2.2	<activesubstancename>	Active Drug Substance Name		100AN		
B.4.k.19	<drugadditional>	Additional Information on Drug		100AN	1 = Test drug 2 = Reference drug 3 = Placebo 4 = Vehicle	Specify whether the drug is the Test Drug, Reference Drug, Placebo, or Vehicle

VI. ELECTRONIC FORMAT FOR ICSR ATTACHMENTS

FDA can accept and archive ICSR attachments in PDF format. Currently approved formats for the non-structured component of an ICSR, such as ICSR attachments, are PDF versions 1.4 (current ICH standard) or 1.6 (current version in use at FDA). An ICSR attachment may be electronically submitted to FAERS either at the same time or after the ICSR to which it is associated is submitted successfully to FAERS.

A. Converting the ICSR Attachment to PDF

Applicants should provide an individual PDF file for each ICSR attachment. If you are submitting multiple ICSR attachments for a particular ICSR, include each attachment in the same PDF file and provide a PDF bookmark to distinguish each attachment. For example, if you are submitting a hospital discharge summary and an autopsy report for a single ICSR, include both in a single PDF file with a bookmark to the hospital discharge summary and a bookmark to the autopsy report.

B. Identification Information in the PDF Document Information Fields

Each PDF file contains fields to be completed by the author of the document. FAERS uses these fields to locate and retrieve the attachments to specific ICSRs. To enable FDA to match the attachment(s) to the correct ICSR, applicants should fill in the PDF document information fields with the appropriate E2B(R2) data elements for the ICSR as indicated in Table 10.

Table 10. Document Information Fields in ICSR Attachments

PDF Document Information Field	Include/Optional	Document Information*	Length
Title	Include	A.1.0.1 <safetyreportid> Sender's (Case) Safety Report Unique Identifier	100AN
Subject	Include	A.1.10.1 <authoritynumb> Regulatory Authority's Case Report Number OR A.1.10.2 <companynumb> Other Sender's Case Report Number	100AN
Author	Optional	A.1.11.2 <duplicatenumb> Other Identification Number	100AN
Keywords	Optional	A.1.7b <receiptdate> Date of Receipt of the Most Recent Information for this ICSR	8N

* The information refers to the data elements in E2B(R2)

In addition:

- Use the ISO-8859-1 character set for the information fields.
- Do not exceed the character length indicated above for each information field.
- Avoid creating any custom fields with names identical to the information fields listed in Table 10.

If you need assistance, you can contact the FAERS electronic submission coordinator at faersesub@fda.hhs.gov.

APPENDIX I. EXAMPLES OF CORRECT AND INCORRECT APPLICATION NUMBER AND DRUG ELEMENT FORMATS

Examples of Application Number Format		Comment
Correct	<drugauthorizationnumb>NDA 012345</drugauthorizationnumb>	
Correct	<drugauthorizationnumb>BLA 123456</drugauthorizationnumb>	
Correct	<drugauthorizationnumb>NDA 012345</drugauthorizationnumb> <drugauthorizationholder>COMPANYX</drugauthorizationholder>	
Incorrect	<drugauthorizationnumb>123456/10300</drugauthorizationnumb>	Use the appropriate prefix for the NDA/ ANDA/ STN/ BLA/ PLA. Do not include additional data after the application number
Incorrect	<drugauthorizationnumb>NDA 12-345;IND12,345 </drugauthorizationnumb>	Omit hyphens and commas in the application number. Do not populate the tag with two application numbers
Incorrect	<drugauthorizationnumb>OTC Product</drugauthorizationnumb>	For a non-prescription drug product marketed without an approved application (Non-Rx No Application), use "999999"
Incorrect	<drugauthorizationnumb>NDA 012345(COMPANYX)</drugauthorizationnumb> <drugauthorizationholder></drugauthorizationholder>	Do not populate the company name in the <drugauthorizationnumb> tag

Examples of Application Number Format		Comment
Correct	<medicinalproduct>TYLENOL</medicinalproduct> <activesubstancename>ACETAMINOPHEN</activesubstancename>	
Correct	<medicinalproduct>MIRACLE WONDER DRUG</medicinalproduct> <activesubstancename>ACETAMINOPHEN</activesubstancename>	
Incorrect	<medicinalproduct>AMAZING DRUG OTC®</medicinalproduct> <activesubstancename>ACETAMINOPHEN 500 mg</activesubstancename>	
Incorrect	<medicinalproduct>NEW DRUG 40 mcg/mL</medicinalproduct> <activesubstancename>NEWSUBSTANCE Inj </activesubstancename>	
Incorrect	<medicinalproduct>MWD</medicinalproduct> <activesubstancename>APAP</activesubstancename>	Do not use abbreviations for the brand name or active substance in the <medicinalproduct> and <activesubstance> tags

APPENDIX II. CASE SCENARIOS FOR IND SAFETY REPORTS SUBMITTED TO FAERS

The following case scenarios are intended to provide examples to sponsors on the use of ICH E2B data standard elements for submission of IND safety reports to FAERS that may differ from postmarketing safety reports.

1. For any IND safety report where the sponsor is evaluating the suspect product under more than one IND (i.e. “Cross-reporting”)
 - a. Repeat block A.2 for each IND
 - i. Use first block A.2 to designate IND where the event occurred = “primary IND”
 1. A.2.3.2 = primary IND
 2. A.2.3.3 = data value could either be 1, 2, 3, or 4
 3. Other relevant information for the report to be populated in block A.2
 - ii. Repeat block A.2 as many times as needed with only the following data elements for each IND that the sponsor holds where that suspect product is being evaluated:
 1. A.2.3.2 = IND number for each cross-reported IND
 - and
 2. A.2.3.3 = 5

Data Element	DTD Descriptor 2.1	Title	Element Values for DTD
A.2.3.2	<sponsorstudynumb>	Sponsor Study Number	IND number under which the Clinical Trial where the event occurred is conducted

Data Element	DTD Descriptor 2.1	Title	Element Values for DTD
A.2.3.3	<observestudytype>	Study Type in Which the Reaction(s) were observed	1= Clinical Trial 2= Individual Patient Use (<i>e.g. ‘Compassionate Use’ or ‘Named Patient Basis’</i>) 3= Other Studies (<i>e.g. Pharmacoepidemiology, Pharmacoeconomics, Intensive Monitoring</i>) 4= Report from Aggregate Analysis 312.32(c)(1)(i)(C) or for several events submitted as per 312.32(c)(1)(i)(B) if a Narrative Summary report is provided. 5=Cross-reported IND safety report

2. For an IND safety report that is a result of an aggregate analysis as per 312.32(c)(1)(i)(C) or for several events submitted as per 312.32(c)(1)(i)(B) if a narrative summary report is provided:

- a. Submit one IND safety report with the IND where the event occurred in A.2.3.2 <sponsorstudynumb> (or the “parent” IND if the events occurred in multiple INDs).

For this IND safety report, populate the data elements below in addition to other relevant information regarding the event and suspect product.

- i. Use data element = 4 in A.2.3.3<observestudytype>
- ii. Use the term “AGGREGATE” in B.1.1 <patientinitial>

- b. Section VII.A.2. of the *FDA Guidance for Industry – “Safety Reporting Requirements for INDs and BA/BE Studies” (December 2012)* discusses several submission requirements for IND safety reports that are a result of an aggregate analysis. The following two sections describe these submission elements and how they are accomplished with electronic submission to FAERS.

- 1. The guidance states that IND safety reports that are a result of an aggregate analysis should contain a narrative description of the event and the results of the analysis (hereafter referred to as a “narrative

summary report”). For IND reports submitted to FAERS, attach the narrative summary report to the IND safety report as a PDF attachment (do not put the narrative summary report in the E2B narrative field).

- a. These instructions also apply to several events submitted as per 312.32(c)(1)(i)(B) if a narrative summary report is provided.
2. The guidance states that all the individual cases that were analyzed in the aggregate analysis should be submitted. Use the repeatable block A.1.12 to link all the safety report numbers for the individual supportive ICSRs (i.e. the numbers in A.1.0.1 for all the individual cases that are summarized in the narrative summary report).
- a. These instructions also apply to several events submitted as per 312.32(c)(1)(i)(B) if a narrative summary report is provided.
 - b. IND safety reports previously submitted as ICSRs to FAERS do not have to be resubmitted (place the safety report numbers for these previously submitted reports in A.1.12).
 - c. For IND safety reports previously submitted in eCTD format, the sponsor should list the eCTD sequence number and date of submission in the narrative summary report. (The eCTD sequence number is the unique four-digit number for each IND submission the sponsor submits in the us-regional.xml file for the eCTD submission.)
 - d. IND safety reports previously submitted on paper should be attached to the IND safety report as PDF attachments.

Data Element	DTD Descriptor 2.1	Title	Element Values for DTD
A.1.12	<linkreportnumb>	Identification number of the report(s) which are linked to this report	Used to link all individual cases (safetyreportid) that make up an IND Safety Report submitted as a result of an Aggregate Analysis as per 312.32(c)(1)(i)(C) or for several events submitted as per 312.32(c)(1)(i)(B) if a narrative summary report is provided
A.2.3.2	<sponsorstudynumb>	Sponsor Study Number	IND number under which the Clinical Trial where the event occurred is conducted

Data Element	DTD Descriptor 2.1	Title	Element Values for DTD
A.2.3.3	<observestudytype>	Study Type in Which the Reaction(s) were Observed	1= Clinical Trials 2= Individual Patient Use (e.g. ‘Compassionate Use’ or ‘Named Patient Basis’) 3= Other Studies (e.g. <i>Pharmacoepidemiology, Pharmacoconomics, Intensive Monitoring</i>) 4= Report from Aggregate Analysis 312.32(c)(1)(i)(C) 5=Cross-reported IND safety report
B.1.1	<patientinitial>	Patient Identifier	For a Report from an Aggregate Analysis, the element value should be “AGGREGATE”

3. For adverse events that occur with a marketed drug being evaluated under an IND that meets both IND and post-marketing safety reporting requirements (21 CFR 312.32 and 314.80, 600.80, or 310.305), sponsors must submit two separate ICSRs:
 - a. for the marketed drug for the NDA/BLA
 - and
 - b. for the study drug for the IND (IND number in A.2.3.2)