

Engaging with the FDA's Center for Drug Evaluation and Research

LT Renu Lal, Pharm.D.
CDER Small Business and Industry Assistance
Division of Drug Information
Office of Communications
Center for Drug Evaluation and Research
Food and Drug Administration
March 2019

Session Overview

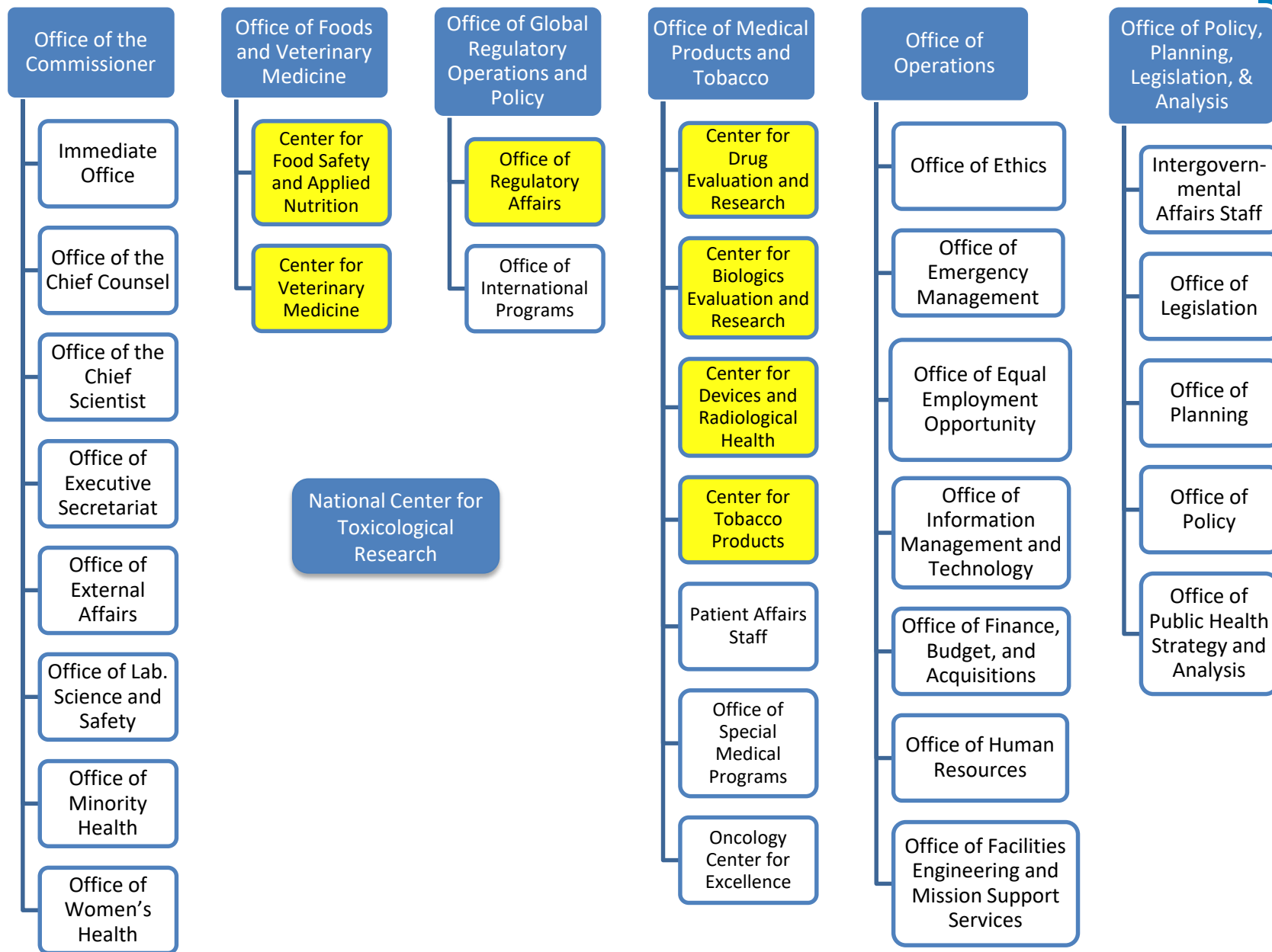
FDA Overview

Paths to Engage with the FDA

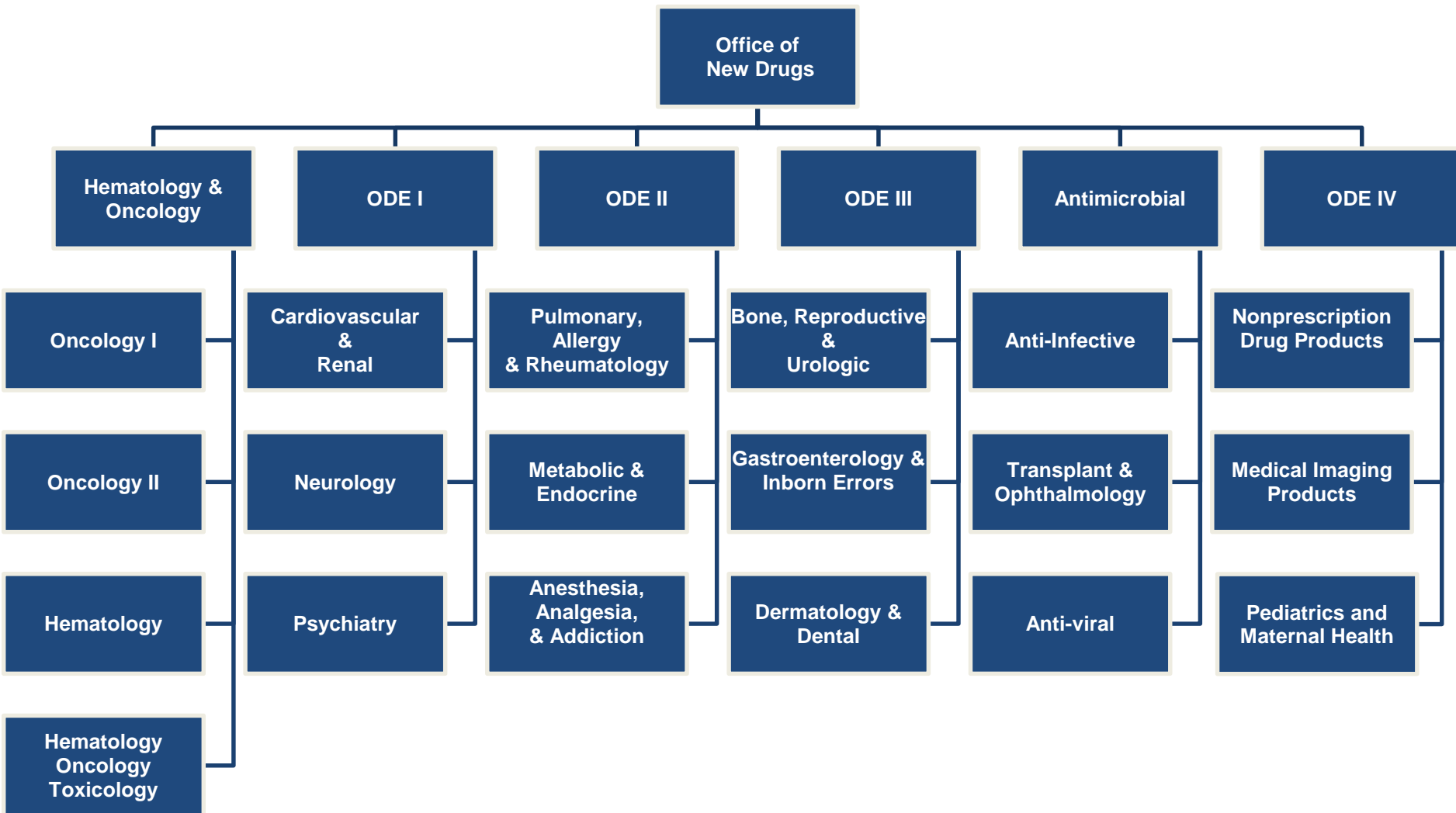
FDA Resources

Case Studies

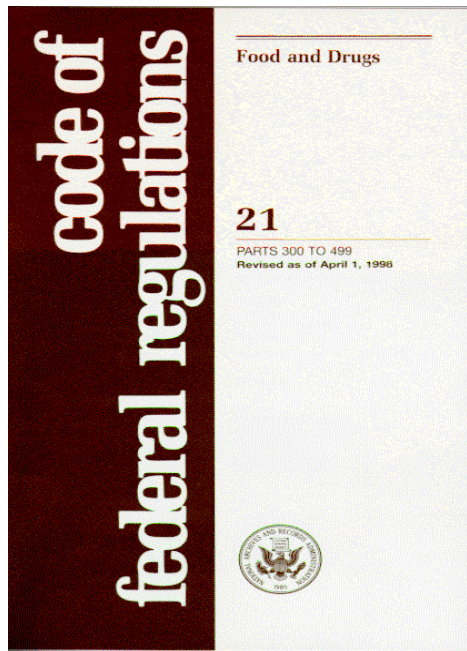
FDA Organizational Framework



CDER Office of New Drugs Organizational Structure

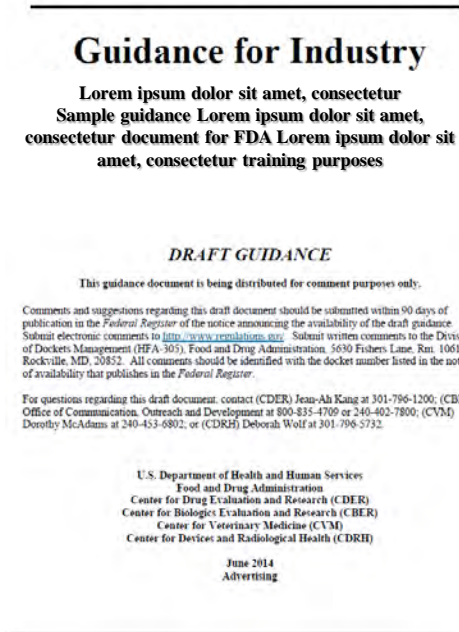


FDA's Regulatory Authority



Code of Federal Regulations

- Written in response to laws passed by Congress
- Represents how FDA interprets the Acts or laws which Congress passes

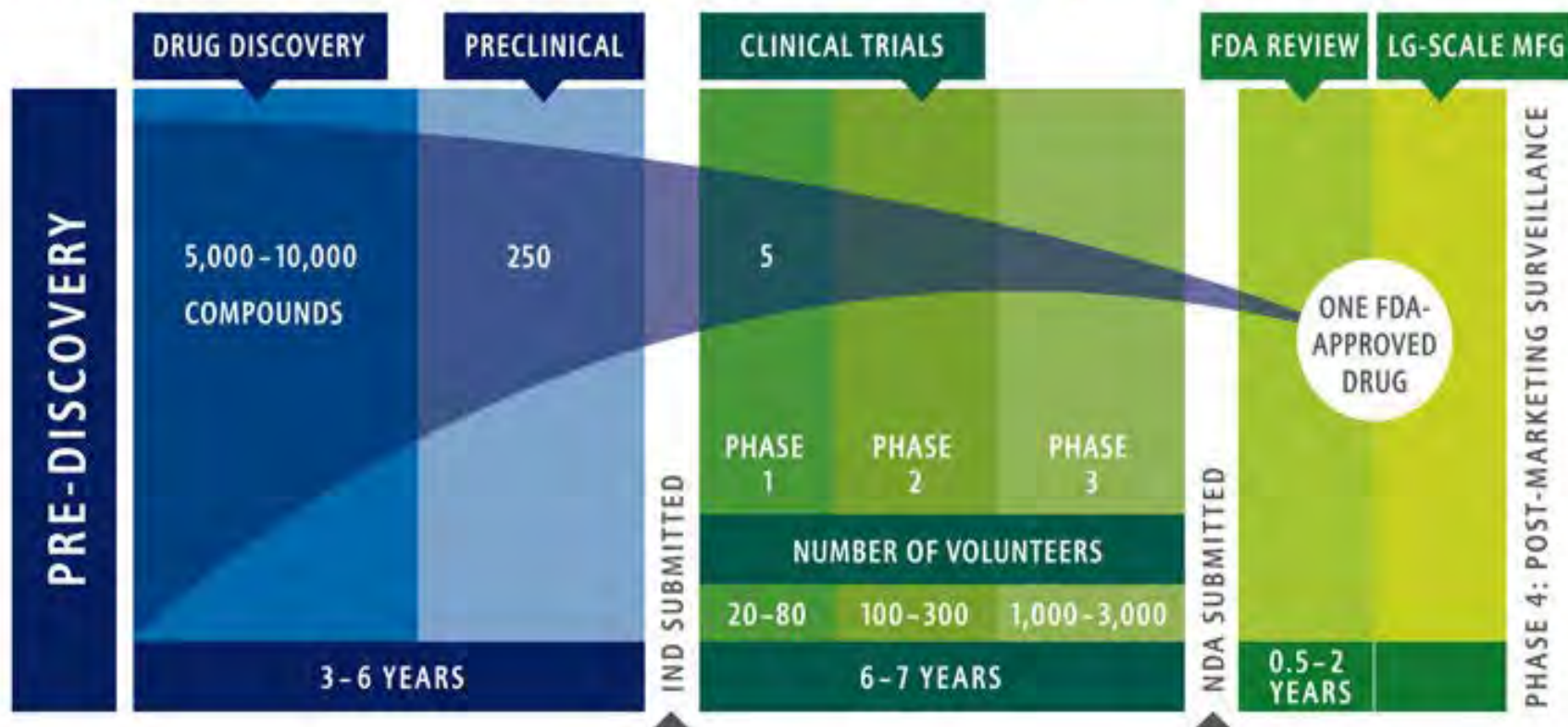


Guidance Documents

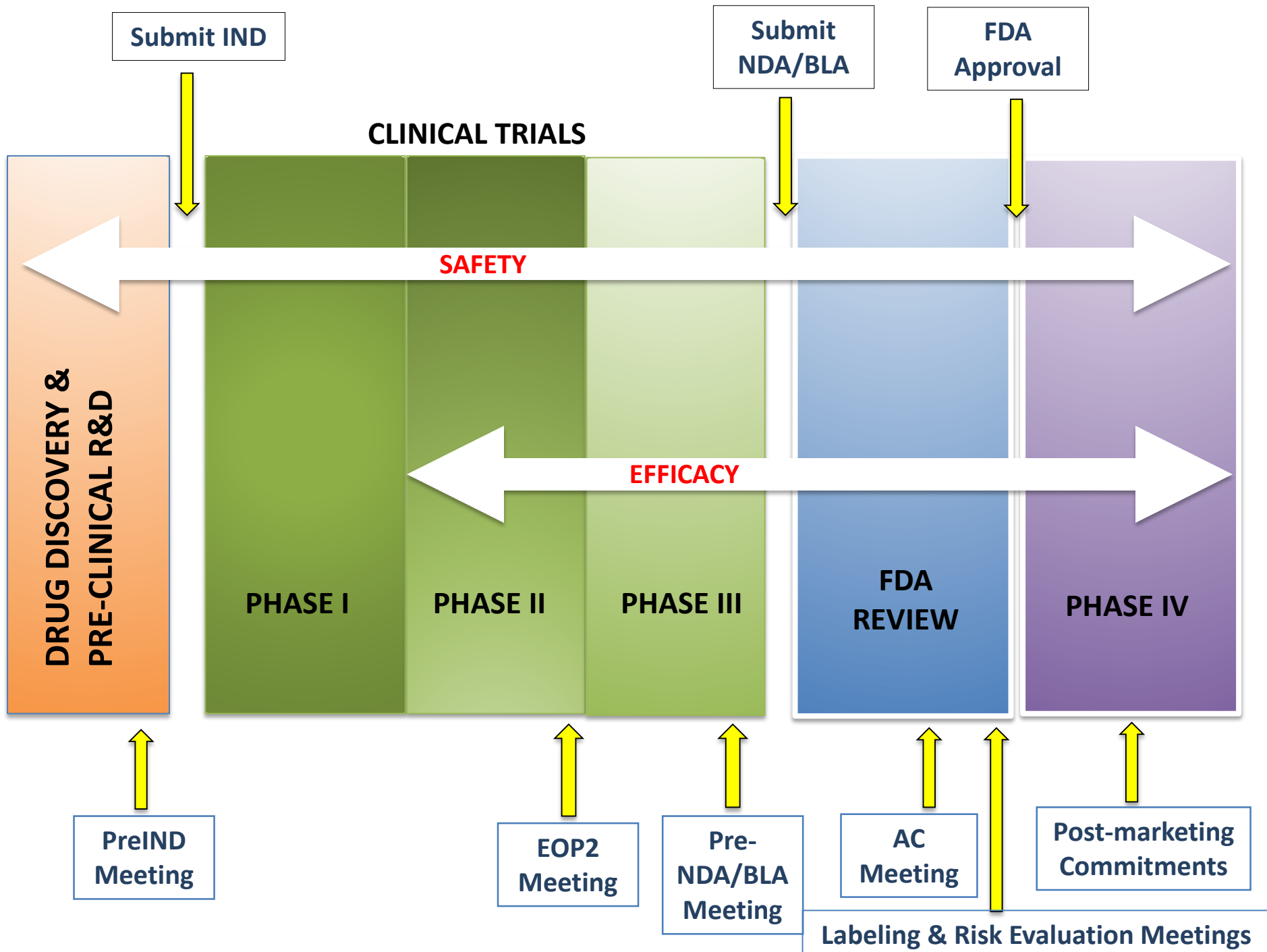
- Represent the Agency's current thinking on a particular subject
- Not binding
- Provide flexibility

New Drug Development Process

Drug Discovery and Development: A LONG, RISKY ROAD



Source: Pharmaceutical Research and Manufacturers of America



Paths to Engage with the FDA



FDA's philosophy:

Timely interactive communication with sponsors during drug development is a core activity to help achieve our mission to facilitate the conduct of efficient and effective drug development programs, which can enhance public health by making new safe and effective drugs available to the American public in a timely manner.

Small Business
and Industry
Assistance

Office of New
Drugs Review
Divisions

Office of New
Drugs Rare
Diseases Program

OND
Communications

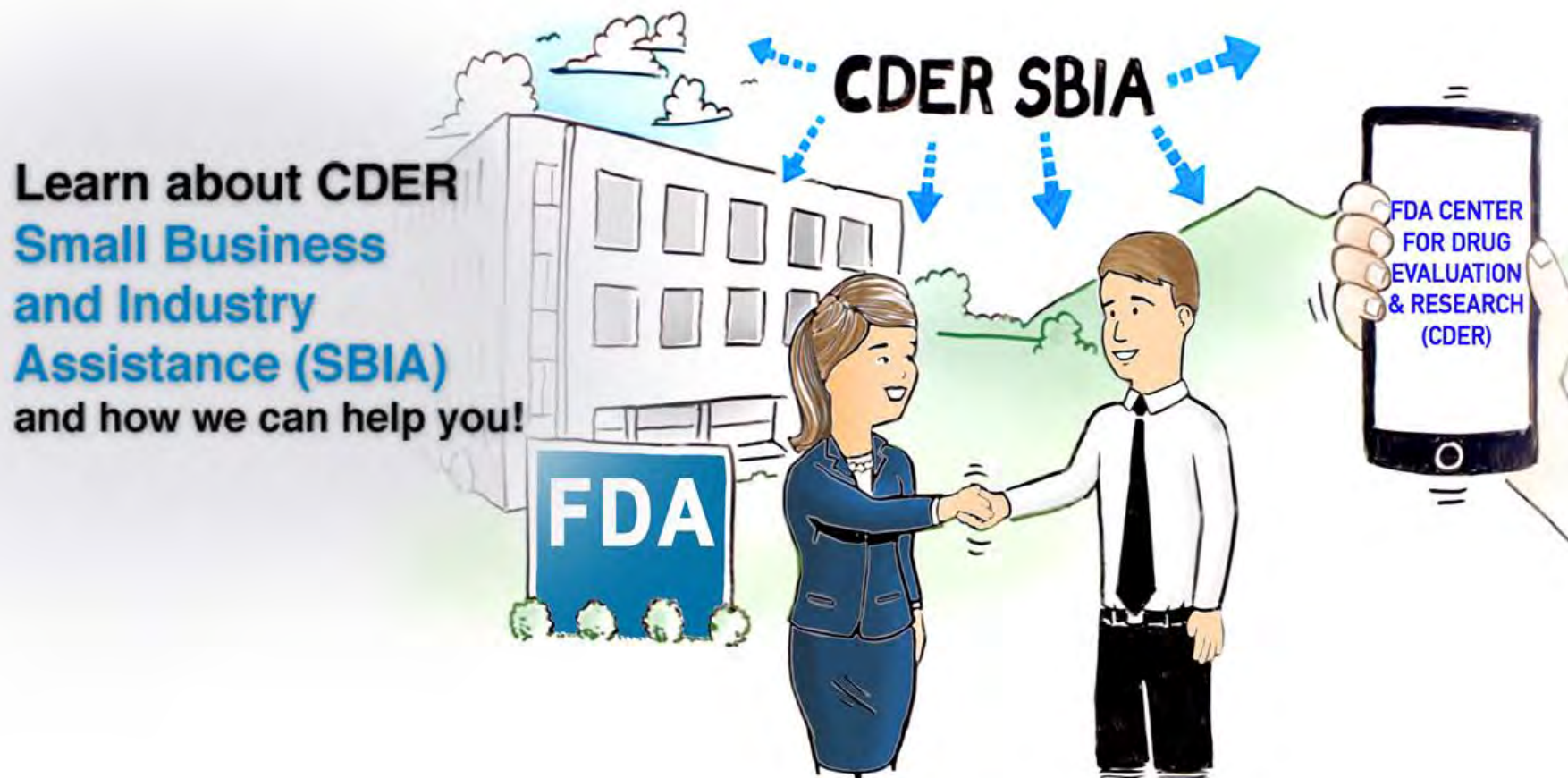


CDER Small Business and Industry Assistance (SBIA)



- Often the first stop for a small pharmaceutical business trying to contact the Agency.
- Goal: To help small pharmaceutical business and industry navigate the wealth of information that FDA offers, and to provide assistance in understanding the regulation of human drug products.

What We Do



**Learn about CDER
Small Business
and Industry
Assistance (SBIA)
and how we can help you!**

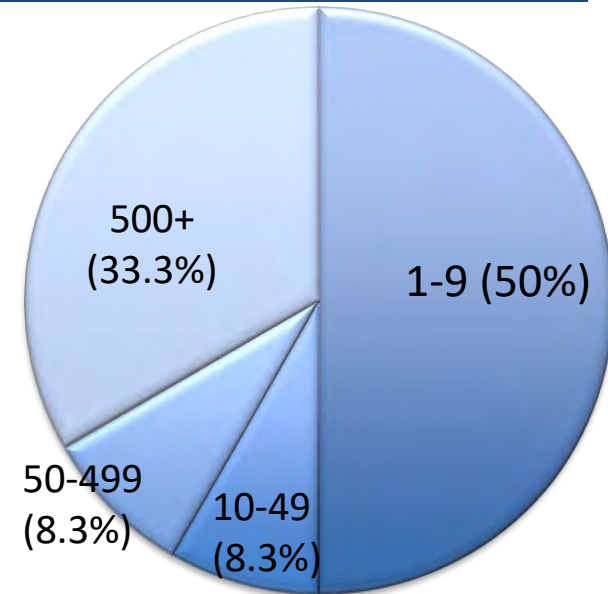
https://www.youtube.com/watch?time_continue=16&v=5I_lhdFaIGY

SBIA Audience

Though our focus is on small business, our resources and outreach activities extend to **all of the regulated pharmaceutical industry**, and are not restricted to small business.

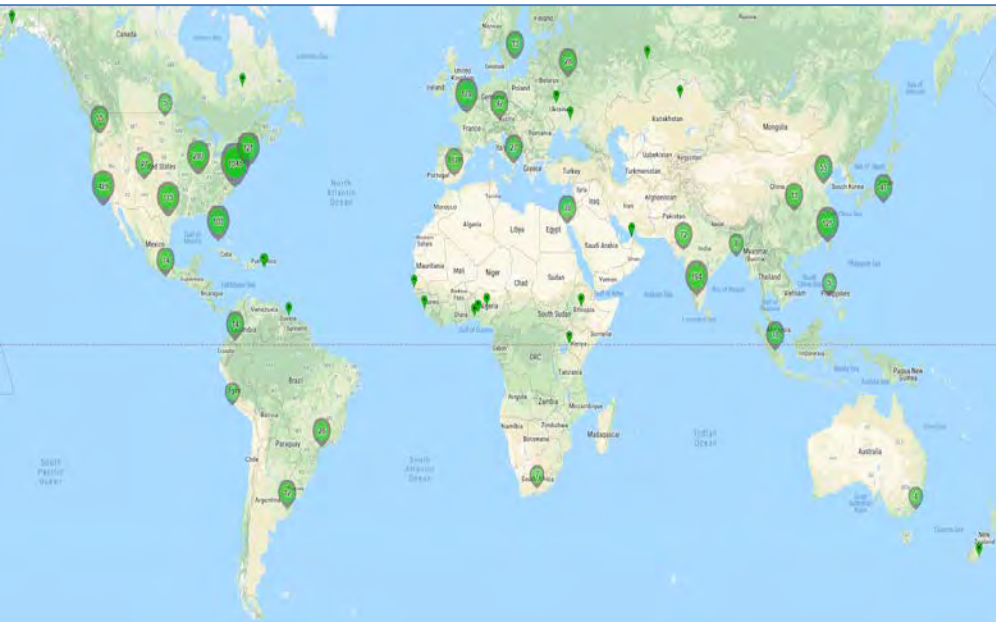
The majority of SBIA clientele are located within the U.S. However, our outreach extends globally.

Company size (# of employees)



For CDER SBIA purposes, the term “small business” is defined as a business that has fewer than 500 employees, including employees of affiliates. An affiliate is further defined as a business entity that has a relationship with a second business entity if:

- one business entity controls, or has the power to control, the other business entity, or
- a third party controls, or has the power to control, both entities.



What We Do



Direct Communication Services

- Phone and email services



Conferences and Workshops

- 6 events in 2018 ; 9 planned for 2019
- Attendance from over 75 countries
- In-person and webcast



Webinars

- Extends SBIA's reach globally
- Q/A sessions for live webinars
- Video and audio archive



Interactions with Foreign Regulators



Presentations & Exhibits

- Speak at 1-2 conferences per year and hold 1:1s with industry
- Exhibits: DIA, ACRP, SOCRA...

What We Do



Webpages

- www.fda.gov/cdersbia
- www.fda.gov/cdersbialearn



CDERLearn

- Industry Education Series
- Currently have 8 courses



CDER SBIA Chronicles (e-newsletter) & Audio Podcasts

- Published every other month, highlighting a specific regulatory issue



Small Biz Buzz (Listserv)

- New FR notices, guidances, meetings, conferences, webinars, regs, etc...)
- 100K+ subscribers



LinkedIn

- SBIA Showcase page
- Disseminate information to our target audience



Publications

CDER Small Business and Industry Assistance

About Us

CDER SBIA Learn: Webinars, Conferences & Trainings

Spotlight

- Regulatory Education for Industry (REdI): Generic Drug Forum April 3-4, 2019
- Regulatory Education for Industry (REdI) Annual Conference May 29-30, 2019
- Regulatory Education for Industry (REdI): 2019 Complex Generic Drug Product Development Workshop – Sep. 25-26, 2019
- Webinar Recording: Framework for FDA's Real-World Evidence Program – Mar 15, 2019
- "FDA Modernizes Clinical Trials with Master Protocols" February 26, 2019 Issue
- 2018 Office of Generic Drugs (OGD) Annual Report
- 2018 OPQ Annual Report (PDF - 5.3MB)
- Final Guidance for Industry: Use of Electronic Health

CDER Small Business & Industry Assistance (SBIA)

f SHARE

t TWEET

in LINKEDIN

p PIN IT

✉ EMAIL

🖨 PRINT

2019 Regulatory Education for Industry (REdI) Event Calendar



April 3-4

Generic Drugs Forum
(GDF)
College Park, MD

May 25-26

REdI Annual
Conference
Boston, MA

Sept 25-26

Complex Generic Drug
Product
Development Workshop
College Park, MD

Drug Development

Pre-Clinical through Investigational New Drug Application (IND)

New Drug Application(NDA)/Biologic License Application (BLA)

Submission of the Marketing Application

Generic Drug Review

Over-the-Counter (OTC) Drug Review

Biosimilars

CDER Small Business and Industry Assistance

[About Us](#)

[CDER SBIA Learn: Webinars, Conferences & Trainings](#)

Learning Resources

- [Webinars](#)
- [Conferences and Workshops](#)
- [Small Business and Industry Education Series](#)
- [CDERLearn Training and Education](#)
- [CDER SBIA Chronicles](#)
- [SBIA Resources in Chinese 中文信息](#)
- [CDRH Learn](#)

CDER SBIA Learn: Webinars, Conferences & Trainings

[f SHARE](#)

[t TWEET](#)

[in LINKEDIN](#)

[p PIN IT](#)

[e EMAIL](#)

[p PRINT](#)



Welcome to CDER SBIA Learn. We offer a variety of multimedia resources to provide information that is comprehensive, interactive, and easily accessible to small pharmaceutical business and industry. Our offerings are organized by topic below.

[Over-the-Counter Drug Regulation](#)

CDER SBIA Contact Information:

Phone: 866-405-5367 or 301-796-6707

Email: **CDERSBIA@fda.hhs.gov**

Monday – Friday, 8 AM – 4:30 PM ET

www.fda.gov/cdersbia www.fda.gov/cdersbialearn

SBIA Email Updates:

<https://updates.fda.gov/subscriptionmanagement>

SBIA LinkedIn:

<https://www.linkedin.com/company/cder-small-business-and-industry-assistance>

Office of New Drugs Review Divisions



Role of Review Division

- Provide advice and guidance to industry regulated industry
- Make regulatory decisions related to new drugs (work in conjunction with other offices)
- Establish policy and procedures governing the above

Scientific Review Staff

- Clinical (M.D.)
- Pharmacology/Toxicology (Ph.D.)
- Regulatory Project Management (R.N., Pharm.D.,)
- Chemistry (Ph.D.)
- Clinical Pharmacology/Biopharmaceutics (Ph.D., Pharm.D.)
- Statistics (Ph.D.)
- Microbiology (Ph.D.)

Formal Meetings with FDA

Type A Meetings

- Necessary for an otherwise stalled product development program to proceed or to address an important safety issue
- Dispute Resolution
- Clinical Holds
- Post action meetings (requested within 3 months of issuance of a complete response letter)

Type B Meetings

- Pre-IND meetings
- Pre-emergency use authorization meetings
- Pre-NDA/BLA meetings
- Post action meetings (requested 3 or more months after the of issuance of a complete response letter)
- Certain End-of-phase (EOP) 1 meetings
- End-of-phase 2 or pre-phase 3 meetings

Pre-IND Meeting (Type B Meeting)

Should have data & a development strategy, and
pre-set well-defined questions



Opportunity to discuss with FDA:
Chemistry Manufacturing & Control Issues
Preclinical studies
Initial Clinical Protocol Design



FDA offers suggestions, clarifies data requirements and
study design

Formal Meetings with FDA



Type C Meetings

- Any meeting other than Type A, Type B, or Type B (EOP) meeting regarding the development and review of a product.
- Includes meetings to facilitate early consultations on the use of a biomarker as a new surrogate endpoint that has never been previously used at the primary basis for product approval in the proposed context of use.
- Can be requested for pre-clinical questions, and can request written responses only.

Formal Meetings with FDA



Meeting Timelines

Meeting Type	Response Time (calendar days from receipt of meeting request/WRO request)	Meeting Scheduling (calendar days from receipt of meeting request)	WRO Response Time (calendar days from receipt of WRO request)
A	14	30	30
B	21	60	60
B (EOP)	14	70	70
C	21	75	75

Formal Meetings with FDA



Pre-Meeting Requests and Packages

- Submit meeting requests and packages for all meeting formats within the timelines per the *Formal Meetings* guidance.
- Submit appropriate information to support the discussion.
- Submit a limited number of clearly worded and targeted questions.
- Meeting packages should be well organized and tabbed/bookmarked.
- The FDA Regulatory Project Manager should send preliminary responses to sponsor questions before the meeting.

Regulatory Project Manager (RPM)



- Primary contact for application-specific, technical, and scientific questions.
- Co-leader of the review team and has knowledge of the drug class, history and related matters.
- Primary resource for negotiating the timely resolution of technical, scientific and regulatory questions, conflicts or problems.

Sponsors should allow a reasonable amount of time for an RPM to respond to the many communications with industry occurring each day.

Accelerating Availability of New Drugs for Patients with Serious Diseases



[Accelerated Approval](#) regulations allowed drugs for serious conditions that filled an unmet medical need to be approved based on a surrogate endpoint.



A [Priority Review](#) designation means FDA's goal is to take action on an application within 6 months.



[Fast Track](#) is a process designed to facilitate the development, and expedite the review of drugs to treat serious conditions and fill an unmet medical need.



[Breakthrough Therapy](#) is a process designed to expedite the development and review of drugs which may demonstrate substantial improvement over available therapy.

PIND File/ Pre-IND Consultation

- Designed to facilitate and foster early/preliminary communications between the division and potential sponsors of new therapeutics/ answering specific questions
- Sponsors should first examine the information available from fda.gov
- Contact Review Division to open PIND file
- No timeline for FDA response – generally WRO
- Division-dependent/ Resource-dependent

PIND File/ Pre-IND Consultation



Examples of pre-IND consultation advice:

- Issues related to data needed to support the rationale for testing a drug in humans
- Design of nonclinical pharmacology, toxicology, and drug activity studies
- Design and potential uses of any proposed treatment studies in animal models
- Data requirements for an IND application
- Initial drug development plans
- Regulatory requirements for demonstrating safety and efficacy

Tips for Productive Meetings with FDA



- Best to contact the RPM prior to submitting any meeting request
- Be sure that the meeting is necessary; answers to questions may be available in the guidance documents
- Ask clear, specific, well-phrased questions
- Prioritize questions and stay focused on the agenda
- Do not hide concerns
- Limit questions to a reasonable number for the time allotted
- Sub-parts of a question are additional questions

Tips for Productive Meetings with FDA



- Present data clearly and consistently
- Do not present data not included in the meeting package
- Obtain clear/concise information through clear questions & listening
- Come to agreement with FDA on timing and required attendees
- Include non-availability dates in a meeting request
- Include interpreters & consultants as attendees in the request
- On meeting day, arrive 15-30 minutes early for security check-in

Office of New Drugs Rare Diseases Program



Mission: To facilitate, support and accelerate the development of drug and biologic products for the benefit of patients with rare disorders.

The Rare Diseases Program:

- Coordinates the development of CDER policy, procedures and training for the review of treatments for rare diseases
- Assists in outside development and maintenance of good science as the basis for the development of treatments for rare diseases
- Works collaboratively with external and internal rare disease stakeholders
- Serves as CDER's focal point to the rare disease drug development community on how best to interact with CDER

<http://www.fda.gov/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ucm221248.htm>

OND Communications



A point of contact for general questions about the drug development process or for clarification on which review division to contact with questions.

Examples:

- Where on the FDA website can I find guidance on electronic submissions?
- What is the mailing address for regulatory submissions?
- Which Review Division should I submit an IND to for an inhaled insulin product?
- Whom should I contact to request a pre-IND meeting for a drug being developed for the treatment of Multiple Sclerosis?

OND Communications



A secondary point of communication for sponsors encountering problems in communicating with their IND review team.

Examples:

- When you have not received a response to a request within a reasonable timeframe
- When you have not received a response in the expected timeframe to a special protocol assessment or meeting request.
- When you have not received a response to a simple or clarifying question or been referred to the formal meeting process within 30 days.

Assists in evaluating the issues to determine appropriate next steps, and then works with the review team & the sponsor to help resolve the problem

OND Communications Contact Information:

Phone: 301-796-0319

Email: ONDCommunications@fda.hhs.gov

Provide the following applicable information when you contact the OND Communications:

- Dates of the communications with the Review Division or Office
- The subject of the communication with the Review Division or Office
- Name of the Review Division or Office
- Application number
- Method of submission: email, phone, formal submission dated DD/MM/YYYY (include the names of those contacted by email or phone)



FDA Resources

- [CDER SBIA](#)
- [CDER SBIA Learn](#)
- [FDA Guidances](#)
- [Code of Federal Regulations](#)
- [FDA Policy and Procedures \(MAPPs\)](#)
- [FDA Basics for Industry](#)

CDER Resources

SBIA/ Division of Drug Information



Office of Pharmaceutical Quality – Pre-Operational Review

Botanical Review Team

Emerging Technology Team

Rare Diseases Program

Therapeutic Biologics and Biosimilars Staff

Biomarker Qualification Program

Controlled Substance Staff

Division of Pediatric and Maternal Health

Import/Export Team

Ombudsman

OND Communications

Case Study #1



Orphana Pharmaceuticals is a small three-person company that has developed a compound for treating a rare genetic disorder. The compound shows promise in the laboratory and in short-term animal studies.

Orphana Pharmaceuticals is now seeking assistance from FDA in learning about the path to FDA approval. They do not have an FDA project manager as this is their first compound that has come this far in development as well as their first contact with FDA. How can Orphana Pharmaceuticals best communicate with FDA?

Case Study #1



Contact SBIA via phone or email. SBIA can:

- Provide Orphana with information about the new drug development process.
- Direct Orphana to the Office of New Drug's Rare Diseases program webpage.
- Provide Orphana with information about OND Communications.

Case Study #2



Amazing Pharmaceuticals would like to meet with FDA to discuss their development plan and to seek guidance for conducting human clinical trials. They would like FDA's input on some questions such as:

- *How should we design our Phase 1, 2, and 3 studies and clinical development plan?*
- *Would our drug qualify for accelerated approval since we are developing it for a rare disease?*

They have conducted short-term animal studies and would like to meet to discuss how to proceed. They would like to know what type of meeting to request and how they should they go about requesting it. They would also like to know when the meeting will be held so that they can make travel plans.

Case Study #2



Amazing Pharmaceuticals should:

- Refer to the [Formal Meetings Between the FDA and Sponsors or Applicants of PDUFA Products](#) guidance document for meeting timelines and requirements.
- Contact SBIA or OND Communications for guidance.
- Contact the Review Division to request a pre-IND meeting (a Type B meeting).
- Provide FDA with data prior to the meeting.
- Ask clear, specific, well-phrased questions based on the data.
- Include accelerated approval questions in the request.

Case Study #3



Beginnings Pharmaceuticals is in early stages of development and is mapping out plans for toxicity studies.

They want to know what type of toxicology studies they need to complete and in which animal models.

What should be the length of the toxicology studies and which organ systems do they need to study?

Case Study #3



Beginnings Pharmaceuticals should first take a look at the toxicology guidances posted on the [FDA Guidances](#) webpage.

If unable to find anything, they should contact SBIA. SBIA will:

- Assist with understanding the *Formal Meetings* guidance and or Pre-IND Consultation program options.
- Check with the OND Communications to inquire whether submitting questions via a PIND is an option for communicating with this particular Review Division at this time.

Case Study #4



Purity Inc. is an active pharmaceutical ingredient manufacturing company and is designing a new site. They would like FDA to review their site plan.

They are requesting guidance regarding the procedure of discussing the site plan with FDA. They have read about the Type A,B,C meetings but are unsure whether these apply.

Case Study #4



Purity Inc. should contact SBIA, who will consult CDER's Office of Pharmaceutical Quality (OPQ).

OPQ will likely refer the company to the [Pre-operational Reviews of Manufacturing Facilities Field Management Directive](#), will provide further direction and may request additional information.

Once Purity Inc. provides the requested information and if the meeting is granted, the meeting would be scheduled generally no earlier than 75 days from the date of the meeting request. A meeting package should also be submitted. The FDA review team may decide that the request will best be answered by written responses only.

FDA's Philosophy



Timely interactive communication with sponsors during drug development is a core activity to help achieve our mission to **facilitate the conduct of efficient and effective drug development** programs, which can **enhance public health** by making new safe and effective drugs available to the American public in a timely manner.

