Inspections and ANDA Review: CDER/OC/OMQ's Role

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Outline

- OMQ's Mission
- Enforcing CGMP
  - What OMQ Evaluates
  - Generics
  - Pending ANDAs
- How Cases Come to OMQ
- Recent OMQ Actions

OC/OMQ Mission

- CDER Office of Compliance (OC) Mission Statement:

  Promote and protect the public health through strategies and actions that minimize consumer exposure to unsafe, ineffective, and poor quality drugs.

- OMQ supports the OC mission by focusing on drug manufacturing

What OMQ Does

- Evaluate compliance with CGMP and other quality issues, primarily for marketed drugs
- Evaluate inspection reports and evidence gathered by FDA investigators in ORA, collaborating with other offices.
- Review information from other FDA offices including OPF and OS

What OMQ Evaluates

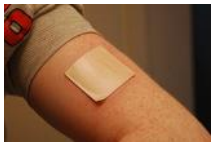
Manufacturing Facility Types

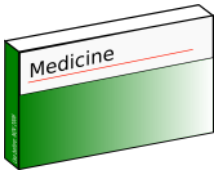
- Finished dosage form (FDF) manufacturers
- Active pharmaceutical ingredient (API) manufactures
- Repacking and relabeling operations
  - Finished dosage forms
  - Active pharmaceutical ingredients
- Laboratories
  - Internal
  - Contract labs
- Contract manufacturers
- Others

Drug Profile Types

- Sterile injectables
- Ophthalmics
- PET drugs
- Topical (sterile and non sterile)
- Transdermal patches
- Tablets & capsules
- Solutions and suspensions

- API by chemical synthesis
- API by fermentation
- Crude API
- Medical gas
- Intermediates
- Excipient
- Components
- Others





Regulatory Pathways: CGMP for All

- Prescription
- Over-the-Counter (OTC)
- Biologics (BLA)
- Innovators (NDA)
- Generics (ANDA)

- Unapproved drugs
- Monograph
- Homeopathic
- Pharmacy compounded
  - CGMP & insanitary conditions

How Generics Fit In

- Generics – just one subset of drug manufacturers OMQ evaluates.
- We apply the same CGMP requirements to generics as to other drugs.
- OMQ's focus: surveillance CGMP inspections & violations/deviations for distributed drugs.
- Sometimes OMQ reviews pre-approval inspections if indicative of marketed product issues.

Facility Requirements for ANDAs

FDA cannot approve an application if:

…the methods used in, and the facilities and controls used for, the manufacture, processing, and packaging of such drug are inadequate to preserve its identity, strength, quality, and purity. FD&C Act § 505(j)(4)

What does this mean for OMQ cases?

Pending ANDAs & OMQ Cases

- OMQ does not review pending ANDAs.
- But, if a facility named in an application is not compliant with CGMP, FDA cannot approve the application.
- OAI classification may trigger a variety of different enforcement outcomes in addition to affecting application approval.
- OMQ cases focus on enforcement for OAI matters; we do not make review decisions.

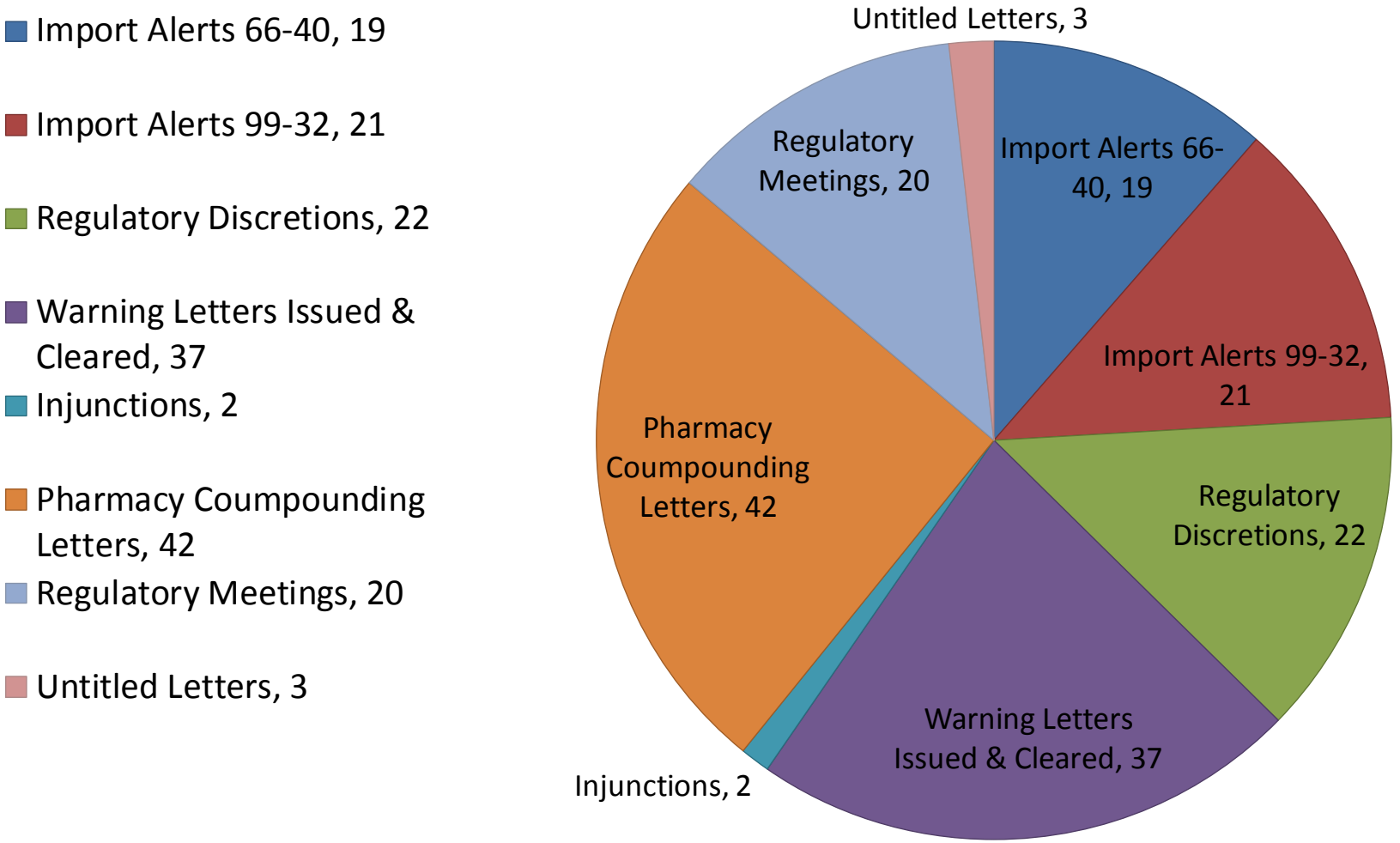
How Cases Come to OMQ

How Cases Come to OMQ

- OMQ cases evaluate questions about deficient CGMP or other manufacturing standards.
- Case referrals can come from
  - OPQ (including OPF and OS)
  - ORA
  - Other Compliance sub offices
  - Other Centers (usually other compliance office)
- Some are initiated in OMQ:
  - Informants
  - Incidents, complaints, signals

Recent OMQ Actions

OMQ Actions
January-September 2016



Recent Warning Letter Trends: CGMP Violations and Deviations

- Data manipulation, deletion, and falsification
  - Manufacturing process and analytical and micro labs
  - Electronic and paper
- Falsified supply chain/pedigree information
- Controls over incoming components/raw materials
- Sterility assurance
- Basic CGMP
  - No release testing
  - Dirt, mold, rodents, insects, & pests in manufacturing areas
- Delay, denial, refusal, and/or limitation of inspections

Questions?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