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# Developing and Submitting Proposed Draft Guidance Relating to Patient Experience Data Guidance for Industry and Other Stakeholders

## *DRAFT GUIDANCE*

**This guidance document is being distributed for comment purposes only.**

Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to <https://www.regulations.gov>. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Room 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document, contact (CDER) Meghana Chalasani at 240-402-6525 or (CBER) Office of Communication, Outreach and Development, 800-835-4709 or 240-402-8010.

**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)**

**December 2018  
Procedural**

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# Developing and Submitting Proposed Draft Guidance Relating to Patient Experience Data Guidance for Industry and Other Stakeholders

*Additional copies are available from:*  
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1 **Developing and Submitting Proposed Draft Guidance Relating to**  
2 **Patient Experience Data**  
3 **Guidance for Industry and Other Stakeholders<sup>1</sup>**  
4

5  
6 This draft guidance, when finalized, will represent the current thinking of the Food and Drug  
7 Administration (FDA or Agency) on this topic. It does not establish any rights for any person and is not  
8 binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the  
9 applicable statutes and regulations. To discuss an alternative approach, contact the FDA staff responsible  
10 for this guidance as listed on the title page.  
11

12  
13  
14 **I. INTRODUCTION**  
15

16 This guidance provides information on how a person can submit a proposed draft guidance  
17 relating to patient experience data for consideration by FDA. This guidance is intended to assist  
18 stakeholders seeking to develop and submit such proposed draft guidance to the Agency. In  
19 addition, FDA recognizes that stakeholders may have other information on patient experience  
20 data that they would like to share with FDA outside of the guidance process and thus provides  
21 information on other ways stakeholders can advance drug development by sharing patient  
22 experience data. Section 3002(c)(5) of the 21<sup>st</sup> Century Cures Act (Cures Act) directs FDA to  
23 issue guidance on how a person seeking to develop and submit a proposed draft guidance  
24 relating to patient experience data for consideration by FDA may submit such proposed draft  
25 guidance to the Agency.<sup>2</sup>  
26

27 In general, FDA’s guidance documents do not establish legally enforceable responsibilities.  
28 Instead, guidances describe the Agency’s current thinking on a topic and should be viewed only  
29 as recommendations, unless specific regulatory or statutory requirements are cited. The use of  
30 the word *should* in Agency guidances means that something is suggested or recommended, but  
31 not required.  
32

33  
34 **II. BACKGROUND**  
35

36 Under Section 569C(c) of the Federal Food, Drug, and Cosmetic Act (as amended by the Cures  
37 Act), patient experience data “includes data that (1) are collected by any persons (including  
38 patients, family members, and caregivers of patients, patient advocacy organizations, disease  
39 research foundations, researchers, and drug manufacturers); and (2) are intended to provide  
40 information about patients’ experiences with a disease or condition, including (A) the impact  
41 (including physical and psychosocial impacts) of such disease or condition, or a related therapy

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<sup>1</sup> This guidance has been prepared by the Office of the Center Director and the Office of Regulatory Policy in the Center for Drug Evaluation and Research (CDER), in cooperation with the Center for Biologics Evaluation and Research (CBER), at the Food and Drug Administration.

<sup>2</sup> See 21st Century Cures Act: <https://www.congress.gov/114/plaws/publ255/PLAW-114publ255.pdf>.

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42 or clinical investigation on patients' lives; and (B) patient preferences with respect to treatment  
43 of such disease or condition.”

44  
45 Patient experience data can capture patients' experiences, perspectives, needs, and priorities  
46 related to (but not limited to):

- 47
- 48 • the symptoms of their condition and its natural history;
  - 49 • the impact of the condition on their functioning and quality of life;
  - 50 • their experience with treatments;
  - 51 • input on which outcomes are important to them;
  - 52 • patient preferences for outcomes and treatments; and
  - 53 • the relative importance of any issue as defined by patients.<sup>3</sup>
- 54

55 Throughout the medical product lifecycle, patient perspectives may be valuable in addressing  
56 specific topics and questions. For instance, patient input on the therapeutic context (e.g.,  
57 debilitating or most bothersome symptoms, disease impacts that matter most to patients, how  
58 well current treatment options help manage the condition) can be helpful at any stage of  
59 development.

60  
61 Patient perspectives on clinical endpoints in clinical trials and clinical outcomes can inform  
62 stages of development from discovery through premarket review. This includes discussions on  
63 how well the most commonly studied endpoints in clinical trials align with outcomes or aspects  
64 of disease that matter most to patients, or whether patients' chief complaints about their  
65 condition are captured in clinical trials. During the design and conduct of a clinical trial, patient  
66 input can be gathered on: how patients excluded from clinical trials can be included in future  
67 trials, difficulties and challenges patients may be facing in participating in clinical trials, and  
68 various measures that may be taken to increase the likelihood of patient enrollment and retention  
69 in a trial.

70  
71 As medical product development moves into premarket review and then the postmarket setting, it  
72 may be informative to collect patient input on benefits and risks and better understand attitudes  
73 toward or tolerance of potential medical product risks and how therapy side effects vary by  
74 subpopulation. Once a product is on the market, it is then helpful to understand whether the  
75 approved labeling is clearly communicating the information that patients need to safely and  
76 effectively use the product and whether there are challenges to adherence with prescribed  
77 therapies.

78  
79 Patient experience data should be collected and analyzed in a methodologically sound and fit-  
80 for-purpose manner. There are several options for contributing patient experience data to the  
81 medical product development and regulatory decision-making process. One option is for  
82 stakeholders to submit proposed recommendations and considerations informed by patient  
83 experience data in the form of a proposed draft guidance.<sup>4</sup> Proposed draft guidance relating to

---

<sup>3</sup> See Patient-Focused Drug Development Glossary:  
<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/ucm610317.htm>.

<sup>4</sup> See 21 CFR 10.115(f)(3).

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84 patient experience data that is developed and submitted by external stakeholders can be helpful  
85 in bringing the patient’s perspective into medical product development and regulatory decision-  
86 making. A stakeholder-submitted proposed draft guidance may be used to inform FDA’s  
87 decision-making and future guidance development work, if applicable.  
88

89 Under FDA’s Good Guidance Practices regulations, FDA guidance documents describe the  
90 Agency’s interpretation of or policy on a regulatory issue and are prepared for use by FDA staff,  
91 applicants/sponsors, and the public.<sup>5</sup> FDA guidance documents do not establish legally  
92 enforceable rights or responsibilities and do not legally bind the public or FDA.<sup>6</sup> When issuing a  
93 Level 1 guidance, FDA will typically issue draft guidance, request public comment, and  
94 following review of received comments, finalize the guidance document.<sup>7</sup> FDA may also revise  
95 existing guidance if warranted, typically using the same process.  
96

97 Submitting proposed draft guidance for FDA’s consideration is not the only option for  
98 contributing patient experience data. Patients, caregivers, patient and disease advocacy groups,  
99 and other stakeholders with knowledge of or access to the patient community, may be well-  
100 positioned to also make broader contributions to advance medical product development.  
101

102 Recognizing that stakeholders may be interested in pursuing other pathways to contribute patient  
103 experience data, this guidance addresses questions relating to both guidance development and  
104 other potential pathways for contributing patient experience data. The questions addressed in this  
105 guidance are as follows:  
106

- 107 • Development and submission of proposed draft guidance relating to patient experience data:
  - 108 – What factors should stakeholders consider when planning and determining whether to
  - 109 develop a proposed draft guidance relating to patient experience data to submit to FDA?
  - 110 – How can stakeholders communicate with FDA that they plan to develop a proposed draft
  - 111 guidance relating to patient experience data?
  - 112 – What are some general considerations regarding format of the proposed draft guidance?
  - 113 – How should stakeholders submit proposed draft guidance to FDA?
  - 114 – What will happen after stakeholders submit the proposed draft guidance to FDA?
  - 115 – Can a stakeholder submit proposed revisions to an existing FDA guidance?
  - 116 – What are other ways for a stakeholder to participate and provide input on FDA policy and
  - 117 guidance development?
  - 118
- 119 • Other opportunities for stakeholders:
  - 120 – What are other opportunities for stakeholders to help advance patient-focused drug
  - 121 development?
  - 122 – How can patient experience data inform medical product development and regulatory
  - 123 decision making?

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<sup>5</sup> See 21 CFR 10.115(b).

<sup>6</sup> Although guidance documents generally reflect FDA’s current thinking, FDA staff may depart from guidance documents with appropriate justification and supervisory concurrence. See 21 CFR 10.115(d).

<sup>7</sup> Procedures for issuing and commenting on FDA draft guidance documents may vary depending on the type of draft guidance issued. For specific information about FDA’s Good Guidance Practices, see 21 CFR 10.115.

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- 124 – What work products relating to patient experience may be developed by stakeholders?  
125 – How can stakeholders submit other work products relating to patient experience data?

126 Resources for stakeholders relating to patient-focused drug development (e.g., decision tools,  
127 flow charts, templates) will be posted on FDA’s CDER Patient-Focused Drug Development web  
128 page,<sup>8</sup> and updated as new resources are developed.

129

130

### 131 **III. QUESTIONS AND ANSWERS**

132

#### 133 **A. Development and Submission of Proposed Draft Guidance Relating to Patient** 134 **Experience Data**

135

- 136 *1. What factors should stakeholders consider when planning and determining whether to*  
137 *develop a proposed draft guidance relating to patient experience data to submit to FDA?*  
138

139

139 Before initiating development of a proposed draft guidance, stakeholders should consider the  
140 following:

141

- 142 a. Is there a stage in a medical product lifecycle that could be particularly informed  
143 by patient experience data for a given disease area (e.g., in discovery phase, to  
144 identify appropriate unmet needs to suggest potential drug targets; during  
145 development to suggest appropriate disease populations, enrollment criteria for  
146 trials, and important trial endpoints; late stage in development to understand  
147 acceptable benefit-risk balance and treatment burden; and post-approval to  
148 understand acceptable safety)?

149

- 150 b. Is the development of a proposed draft guidance the best way to address an  
151 identified need in a given disease area?

152

153 FDA guidance documents cover a range of topics, including: (1) clinical guidance  
154 that may provide more general treatment of issues related to drug development for  
155 a given disease and with broad discussion of subpopulation issues; and (2)  
156 methodological guidance that may provide general treatment of methodological  
157 issues and cover a range of research trial settings, patient populations, cultural  
158 contexts, and sociodemographic considerations.

159

160 It may be appropriate for stakeholders to develop a proposed draft guidance if:

161

- 162 • FDA has issued a clinical guidance in a given disease area, but the guidance  
163 does not address considerations and/or examples for a specific subpopulation.  
164 A stakeholder may want to provide subpopulation-specific considerations,

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<sup>8</sup> See CDER Patient-Focused Drug Development Homepage:  
<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/ucm579400.htm>.

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165 examples, and/or recommendations related to the disease area discussed in the  
166 FDA guidance.

167  
168 • FDA has issued a methodological guidance (e.g., adaptive clinical trial  
169 designs) that is applicable to a range of disease areas and patient populations,  
170 but the guidance does not provide specific considerations or examples of how  
171 the methods can be applied or adapted for a specific disease area and/or  
172 subpopulation. A stakeholder may want to provide disease- or subpopulation-  
173 specific considerations, examples, and/or recommendations related to the  
174 methods discussed in the FDA guidance.

175  
176 • FDA has not issued a clinical guidance in a given disease area, but there  
177 appears to be a need for a disease-specific guidance to address topics related  
178 to patient experience data (e.g., clinical outcome assessments, endpoints,  
179 clinical trial considerations). Please note that CDER and CBER each publish  
180 on FDA’s website a list of guidance topics that the respective Center is  
181 considering for development during the current calendar year.

182  
183 c. Are resources, expertise, and stakeholder capacity available to collect any relevant  
184 patient experience data, conduct required analysis, and further develop a proposed  
185 draft guidance? Would the available resources be more suitable to focus on other  
186 efforts (e.g., those discussed in Section II, Other Opportunities for Stakeholders)?

187  
188 FDA encourages contacting FDA staff early to discuss patient experience data  
189 that may be useful to collect and submit to the FDA. Please refer to the series of  
190 FDA Patient-Focused Drug Development guidances before collecting patient  
191 experience data.<sup>9</sup>

192  
193 d. If patient experience data has been collected and analyzed, is it suitable to provide  
194 recommendations or considerations to include in a proposed draft guidance? If  
195 not, stakeholders should consider other opportunities to share patient experience  
196 data (see Section II, Other Opportunities for Stakeholders).

197  
198 2. *How can stakeholders communicate with FDA that they plan to develop a proposed draft*  
199 *guidance relating to patient experience data?*

200  
201 Stakeholders are not required to communicate with FDA in advance of submitting a proposed  
202 draft guidance. However, when developing proposed content for disease- and indication-specific  
203 recommendations for FDA’s consideration, it may be helpful (for FDA awareness) to provide  
204 FDA with a brief summary of the expected content, along with a projected timeframe for  
205 submission and a point of contact for potential follow-up. Ideally, these summaries will be brief  
206 (2-3 pages at maximum) and should be sent only to PED-

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<sup>9</sup> See FDA draft guidance for industry and other stakeholders, *Patient-Focused Drug Development: Collecting Comprehensive and Representative Input* (June 2018). When final, this guidance will represent FDA’s current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/RegulatoryInformation/Guidances/default.htm>.

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207 ProposedGuidanceSummary@fda.hhs.gov. No other documents or inquiries should be sent to  
208 that email address. The email title should reflect that the summary is a “Development Summary  
209 for Anticipated Proposed Draft Guidance” and indicate the subject matter (e.g., disease area) for  
210 the anticipated proposed draft guidance. After receipt by the Agency, the summaries will be  
211 directed internally to appropriate points of contact for awareness and consideration. While FDA  
212 does not intend to issue acknowledgement letters or other communications in response to these  
213 summaries as a matter of course, the Agency may reach out to points of contact identified should  
214 the Agency believe follow-up would be useful.

215  
216 3. *What are some general considerations regarding the format of a proposed draft guidance?*

217  
218 A proposed draft guidance should be formatted so that it provides clear and concise  
219 recommendations for FDA to consider should FDA develop a guidance on the topic, and should  
220 not give the impression that it is an FDA-drafted document. A proposed draft guidance should:

- 221
- 222 a. Address one or two topics relevant to a specific disease area drug development  
223 plan.
  - 224
  - 225 b. Be written from the stakeholder’s perspective, not as FDA. For example, language  
226 such as “FDA suggests,” “FDA encourages,” and “FDA recommends” should not  
227 be used. Instead, FDA recommends language such as “The available patient  
228 experience data suggests that patients seek X” or “We recommend that sponsors  
229 consider.”
  - 230
  - 231 c. Include a unique title page. The proposed draft guidance should not follow FDA’s  
232 visual identity program or mirror the formatting style of FDA guidance  
233 documents.
  - 234
  - 235 d. Refrain from making any statement that indicates, implies, or suggests that FDA  
236 has endorsed the document, including by use of the FDA logo.
  - 237
  - 238 e. Be succinct and generally no more than 5 pages.
  - 239
  - 240 f. Include an introduction clearly stating the purpose of the proposed draft guidance;  
241 provide high-level background that includes a brief description of the disease,  
242 patient population, severity of the condition, available treatment options, and  
243 topics or issues to be addressed in the document; and propose considerations and  
244 recommendations on the topics or issues relevant to the purpose of the proposed  
245 draft guidance. Please refer to examples of FDA’s short disease-specific bulleted  
246 guidance documents (e.g., (1) *Inborn Errors of Metabolism That Use Dietary*  
247 *Management: Considerations for Optimizing and Standardizing Diet in Clinical*  
248 *Trials for Drug Product Development*, (2) *Hypertension: Conducting Studies of*  
249 *Drugs to Treat Patients on a Background of Multiple Antihypertensive Drugs*, and  
250 (3) *Pediatric HIV Infection: Drug Development for Treatment*) and consider a  
251 similar format.
  - 252

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253 g. If applicable, include specific examples. Examples could be related to a specified  
254 subpopulation or special issues defined by factors such as patient age, disease  
255 severity, co-morbidities, or other concerns. They might also relate to how specific  
256 methods recommended in existing FDA guidance would or would not be applied  
257 in specific trial settings for specified patient subpopulations, including variations  
258 in economic and cultural context, language ability, literacy, numeracy, mobility,  
259 or age group. Stakeholders may also propose examples of alternative methods that  
260 may be most applicable.

261  
262 h. Include a study report and protocol when submitting methodologically collected  
263 patient experience data as supporting information with a proposed draft guidance.  
264 If applicable, also include additional information such as the primary data capture.  
265 For additional guidance on submission of patient experience data, please  
266 reference FDA draft guidance on Patient-Focused Drug Development: Collecting  
267 Comprehensive and Representative Input.<sup>10</sup>  
268

#### 4. *How should stakeholders submit proposed draft guidance to FDA?*

269 As specified in FDA’s Good Guidance Practices regulations,<sup>11</sup> drafts of proposed guidance  
270 documents should be marked “Guidance Document Submission,” and submitted to:

271  
272  
273  
274 Division of Dockets Management (HFA-305),  
275 5630 Fishers Lane, Rm. 1061,  
276 Rockville, MD 20852  
277

278 Stakeholders may also submit a proposed draft guidance electronically via [www.regulations.gov](http://www.regulations.gov)  
279 under the shell docket 2013-FDA-S-0613. Instructions for filing a proposed draft guidance  
280 electronically are available in that shell docket and on FDA’s guidances web page.<sup>12</sup>  
281

#### 5. *What will happen after stakeholders submit the proposed draft guidance to FDA?*

282  
283  
284 For stakeholders interested in submitting a proposed draft guidance, FDA’s Division of Dockets  
285 Management will open a new docket for each proposed draft guidance document submission and  
286 will send a letter to acknowledge receipt of the proposed draft guidance. The proposed draft  
287 guidance document will be available to the public. After receiving the proposed guidance  
288 document submission from the Division of Dockets Management, FDA’s CDER or CBER will  
289 ensure it is sent to the relevant office(s) and/or division(s) within each Center.  
290

291 Submission of a proposed draft guidance to FDA does not mean that FDA will publish its own  
292 draft guidance on the topic(s) identified. FDA has its own process for developing guidance based

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<sup>10</sup> See FDA draft guidance *Patient-Focused Drug Development: Collecting Comprehensive and Representative Input*.

<sup>11</sup> See 21 CFR 10.115.

<sup>12</sup> See FDA’s Instructions for Submitting Drafts of Proposed Guidance Documents Electronically available on FDA’s web page at:  
<https://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm601464.htm>.

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293 on several factors including the state of the science in a given area, policy priorities, and Agency  
294 resources. The stakeholder-submitted proposed draft guidance can be used to inform FDA’s  
295 thinking and future guidance development work, if applicable.

296

297 *6. Can a stakeholder submit proposed revisions to an existing FDA guidance?*

298

299 Under FDA’s Good Guidance Practice regulations, stakeholders can provide comments on a  
300 guidance document at any time. They may also suggest that FDA revise or withdraw an existing  
301 guidance document.<sup>13</sup> The suggestion should address why the guidance document should be  
302 revised or withdrawn and, if applicable, how it should be revised. The suggestion should be  
303 submitted as a comment to the public docket assigned to that specific guidance. To find an  
304 assigned public docket, please visit [www.regulations.gov](http://www.regulations.gov) and search for the specific guidance.

305

306 *7. What are other ways for a stakeholder to participate and provide input on FDA policy and*  
307 *guidance development?*

308

309 There are other opportunities for stakeholders to provide input on FDA policy and guidance  
310 development, such as participating in FDA-led meetings. Stakeholders are encouraged to attend  
311 FDA-led public meetings on policy development, patient-focused drug development, or technical  
312 issues in a given disease area. In addition to participating in meetings, stakeholders can submit  
313 written comments to the public docket that is assigned to each meeting.

314

### **B. Other Opportunities for Stakeholders**

315

316 Stakeholders, including patient and disease advocacy groups, may be well positioned to make  
317 contributions to advance the understanding of disease burden, progression, treatment burden,  
318 challenges to clinical trial participation, and other issues and policy considerations from the  
319 perspective of patients and caregivers. This work can be pursued by stakeholders on their own,  
320 independent of FDA involvement.

321

322 *1. What are other opportunities for stakeholders to help advance patient-focused drug*  
323 *development?*

324

325 There are several other opportunities stakeholders may wish to pursue depending on their  
326 particular capabilities, expertise, and priorities. Other areas of opportunity may include:

327

328

329 a. Developing a patient registry: The purposes for patient registries can range  
330 widely, including use in recruiting patients for clinical trials; providing  
331 information on a given disease area; developing therapeutics; learning about  
332 behavior patterns and their association with disease development; and developing  
333 research hypotheses. Patient registries can also be used to monitor outcomes and  
334 study best practices in care or treatment.<sup>14</sup>

---

<sup>13</sup> See 21 CFR 10.115(f)(4).

<sup>14</sup> See Engaging Patients in Information Sharing and Data Collection: The Role of Patient-Powered Registries and Research Networks [Internet]: <https://www.ncbi.nlm.nih.gov/books/NBK164514/>.

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335  
336 b. Conducting natural history studies: Stakeholders may collaboratively develop and  
337 conduct natural history studies. Natural history studies track the course of disease  
338 over time, identifying demographic, genetic, environmental, and other variables  
339 that correlate with its development and outcomes in the absence of treatment.  
340 These studies can inform the basis for recruiting and retaining patients in clinical  
341 trials.

342  
343 Stakeholders, including investigators from industry, academia, patient and disease  
344 advocacy groups, and government, may also request a Critical Path Innovation  
345 Meeting with FDA to discuss topics regarding natural history study designs and  
346 implementation, biomarkers in the early phase of development, clinical outcome  
347 assessments in the early phase of development, innovative conceptual approaches  
348 to clinical trial design and analysis, and plans to collect patient experience data.<sup>15</sup>  
349

350 c. Coordinating work among patient groups and other stakeholders: It is helpful for  
351 patient groups to align efforts to advance work in a disease area. This can help  
352 ensure that patient groups avoid duplicative efforts and help maximize the use of  
353 resources and valuable patient and staff time.  
354

355 Stakeholders may also wish to establish public-private partnerships or consortia to  
356 bring multiple stakeholders together, including FDA, to address issues that are  
357 beyond the capacity and resources of a single organization.<sup>16</sup>  
358

359 d. Communicating, educating, and conducting outreach: Stakeholders, particularly  
360 patient groups, may be well positioned to communicate and conduct outreach with  
361 the patient community through sources such as emails, newsletters, and social  
362 media. This outreach will help ensure that communities are aware of continuing  
363 work in the disease area, along with opportunities to engage with other  
364 stakeholders.  
365

366 Patient groups may be well positioned to help develop and conduct trainings to  
367 educate communities on a given disease and medical product development for  
368 that disease. Topics for trainings may include types of research and testing needed  
369 to develop and manufacture safe and effective treatments, timeframes required for  
370 development, phases of clinical development, importance of clinical trials, and  
371 where to access clinical trials.  
372

373 e. Convening meetings: Stakeholders can convene meetings to advance discussion  
374 on topics related to medical product development for a given disease. For

---

<sup>15</sup> See FDA Critical Path Innovation Meeting website:

<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/DrugInnovation/ucm395888.htm>.

<sup>16</sup>For information about CDER's policy and procedures governing its staff participation in public private partnership and consortia, see CDER Manual of Policies and Procedures on CDER Staff Participation in Public-Private Partnerships and Consortia:

<https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ManualofPoliciesProcedures/UCM532571.pdf>.

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375 example, stakeholders can host meetings on scientific or technical issues to  
376 discuss challenges or opportunities in a given disease area related to enhancing a  
377 clinical development program. This can be an opportunity to convene experts  
378 from patient and disease advocacy groups, federal agencies, industry, academia,  
379 and healthcare institutions to discuss specific scientific or technical issues that  
380 may need further structuring, identification of areas for further research, or  
381 enhanced data collection.

382  
383 f. Collecting patient experience data: Patient input can help inform the therapeutic  
384 context for regulatory review. Patient input can also provide a direct source of  
385 evidence regarding the benefits and risks of a medical product, if  
386 methodologically-sound data collection tools are developed and used within  
387 clinical trials of an investigational therapy.

388  
389 In the early stages of drug development (e.g., discovery), patient and disease  
390 advocacy groups may conduct an externally-led Patient-Focused Drug  
391 Development meeting or focus group to gather patients' perspectives on disease  
392 and treatment burden.<sup>17</sup> The information and perspectives obtained in these  
393 meetings can be used to develop meeting reports or other work products  
394 summarizing what was heard.

395  
396 Stakeholders, in collaboration with appropriate methodologists, can conduct  
397 methodologically-sound surveys to collect representative input on patients'  
398 experiences living with their disease, using available treatments, accessing and  
399 participating in clinical trials, and weighing acceptable levels of benefits and  
400 risks.

401  
402 Stakeholders may also want to consider collaborating with one or more sponsors  
403 to collect patient input on a given disease, including patient input on the  
404 significant symptoms of the given disease, currently available treatments for the  
405 given disease, or other types of patient experience data. Stakeholders may also  
406 want to consider sharing their independently collected patient experience data  
407 with sponsors for potential use in decision-making.

408  
409 For methodological considerations when collecting patient experience data, please  
410 refer to the series of methodological Patient-Focused Drug Development  
411 guidances being developed by FDA.<sup>18</sup>

412  
413 2. *How can patient experience data inform medical product development and regulatory*  
414 *decision making?*

415

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<sup>17</sup> See FDA Externally-led Patient-Focused Drug Development Meetings website:

<https://www.fda.gov/ForIndustry/UserFees/PrescriptionDrugUserFee/ucm453856.htm>.

<sup>18</sup> See FDA Patient-Focused Drug Development Methodological Guidance Series for Enhancing the Incorporation of the Patient's Voice in Medical Product Development and Regulatory Decision Making:

<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/ucm610279.htm>.

## *Contains Nonbinding Recommendations*

*Draft — Not for Implementation*

416 Patient experience data that is collected and corresponding work products that are generated can  
 417 serve as a valuable resource to multiple stakeholders throughout medical product development  
 418 and decision-making, including FDA, other federal partners, industry, patient and disease  
 419 advocacy groups, healthcare providers, and academic researchers. For a high-level overview of  
 420 how patient experience data could enhance medical product development and decision-making,  
 421 please see **Table 1**.

422  
 423 **Table 1: How Patient Experience Data Could Enhance Medical Product Development and**  
 424 **Decision Making**

Type of Patient Experience Data	Type of Stakeholder		
	Patient Stakeholders*	Medical Product Developers/Researchers	Regulators
<b>Patient registry or natural history study data</b>	<ul style="list-style-type: none"> <li>• Inform communications, education and outreach efforts for the patient community</li> <li>• Inform future research</li> <li>• Provide basis for recruitment in clinical trials</li> </ul>	<ul style="list-style-type: none"> <li>• Help identify biomarkers and clinical outcome measures that will show how well a patient responds to a treatment in clinical trials</li> <li>• Inform clinical trial design</li> <li>• Support clinical trial recruitment</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance the understanding of the course of disease over time, identifying demographic, genetic, environmental, and other factors that correlate with its development and outcomes in the absence of treatment (or while on available therapies)</li> </ul>
<b>Study report or survey data on the therapeutic context (severity of condition and unmet medical need), including perspectives on disease background, severity of condition, and available treatment options</b>	<ul style="list-style-type: none"> <li>• Identify burden of disease and unmet medical needs that warrant further scientific discussion</li> <li>• Identify opportunities and gaps where further development and research may be needed</li> <li>• Identify considerations for clinical endpoints and clinically meaningful outcomes</li> <li>• Inform patients on possibilities to participate in development and validation of clinical trial endpoints and patient-reported outcomes</li> </ul>	<ul style="list-style-type: none"> <li>• Informs Target Product Profile</li> <li>• Identify clinical domains (e.g., most bothersome symptoms) of the condition that could be targeted for new treatment development</li> <li>• Identify how the condition may vary by sociodemographic factors, subgroups, culture, and disease severity</li> <li>• Inform the selection, development and modification of meaningful clinical endpoints and outcomes, and tools that measure what matter most to patients</li> <li>• Inform clinical trial design, including appropriate inclusion and exclusion criteria</li> </ul>	<ul style="list-style-type: none"> <li>• Inform FDA decision-making throughout medical product lifecycle</li> <li>• Enhance the understanding of the therapeutic context for benefit-risk assessments</li> <li>• Enhance understanding of meaningful endpoints and outcomes to patients to appropriately advise sponsors on a medical product development plan in early phases of development</li> <li>• Inform FDA guidance on disease-specific clinical, scientific and regulatory matters</li> <li>• Inform FDA assessments of medical product development programs</li> </ul>
<b>Clinical trial experience data, including perspectives on trial visits and assessments</b>	<ul style="list-style-type: none"> <li>• Help clinical trial participants better prepare for the trial, including the informed consent process</li> <li>• Inform patients on opportunities to participate in clinical trials and improve overall recruitment</li> <li>• Help individual decision making on whether to enroll in a trial</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance recruitment and retention for clinical trials</li> <li>• Inform development of informed consent documents</li> <li>• Provide insight into clinical trial participant burden, including frequency and conduct of trial visits and assessments</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance understanding of patient’s experience with clinical trial design and inclusion/exclusion criteria to better advise sponsors</li> </ul>
<b>Patient input on benefits and risks</b>	<ul style="list-style-type: none"> <li>• Inform future research</li> <li>• Identify unmet medical needs that warrant further scientific discussion</li> <li>• Enhance the understanding of benefits and risks for patients</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance the understanding of patient input on benefits and risks to inform benefit-risk assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Enhance the understanding of patient input on benefits and risks to inform benefit-risk assessment</li> </ul>

## Contains Nonbinding Recommendations

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Type of Patient Experience Data	Type of Stakeholder		
	Patient Stakeholders*	Medical Product Developers/Researchers	Regulators
Perspectives on ways to communicate information to patients and prescribers	<ul style="list-style-type: none"><li>Inform communications and education for the patient community to enhance shared decision-making between patients and prescribers</li></ul>	<ul style="list-style-type: none"><li>Improve the overall communication of information to patients and prescribers</li></ul>	<ul style="list-style-type: none"><li>Inform how to convey key information that helps facilitate patients' informed decision-making</li></ul>

\* Patient stakeholders include patients, caregivers, and patient advocates. To provide standardized nomenclature and terminologies related to patient-focused medical product development, these terms are defined in FDA's Patient-Focused Drug Development Glossary.

425

426 3. *What work products relating to patient experience data may be developed by stakeholders?*

427

428 A range of work products related to patient experience can be developed to provide helpful data  
429 and information to facilitate patient-focused drug development in a given disease area. Work  
430 products may include:

- 431 • Meeting reports summarizing patient perspectives on disease and treatment burden
- 432 • Methodologically-sound patient surveys
- 433 • White papers or peer-reviewed journal articles describing topics such as background on  
434 disease, and considerations for clinical trials in a given disease area
- 435 • Case examples to address disease-specific considerations related to medical product  
436 development
- 437 • Natural history study report
- 438 • Proposed draft guidance relating to patient experience data.

439

440 4. *How can stakeholders submit work products relating to patient experience data?*

441

442 Stakeholders who would like to share work products (e.g., meeting reports, surveys) with FDA  
443 may visit the FDA's External Resources and Information Related to Patient Experience web  
444 page.<sup>19</sup> This web page provides links to publicly available reports and resources relating to  
445 patient experience data. Key stakeholders including patient communities, patient advocates,  
446 researchers, drug developers, and federal agencies may find these materials useful. Please note  
447 that although FDA reviews the materials at these links before posting them to ensure that the  
448 materials are within the scope of the web page, FDA does not assess their scientific merit or  
449 compliance with applicable regulatory requirements. FDA's decision to post links to these  
450 materials does not reflect an endorsement of their authors, sponsors, or content.

451

452 Please visit the web page for more information regarding what types of resources may be  
453 included on this web page, how to submit a publicly available website link for this web page, and  
454 other general questions.

455

456 To submit proposed draft guidance documents, follow the process outlined in this guidance (See  
457 Section III.A, Development and Submission of Proposed Draft Guidance Relating to Patient  
458 Experience).

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<sup>19</sup> See FDA's External Resources or Information Related to Patients' Experience web page:  
<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/ucm579132.htm>.