

Standardization of Pharmaceutical Quality Chemical Manufacturing and Controls (PQ/CMC): What is it? Where are things now? How can you learn more?

G. Scott Gordon, Ph.D.

Senior Health Informatics Officer
Data Standards Staff, Office of Strategic Programs
CDER | US FDA

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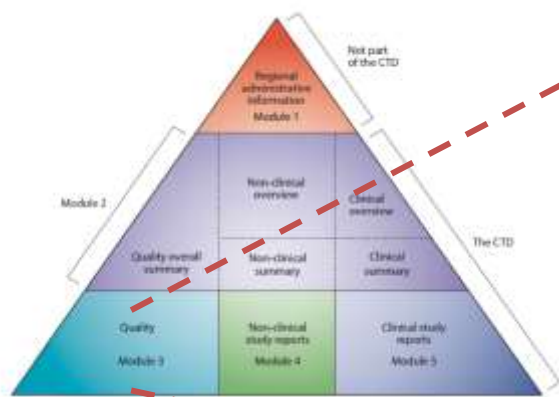
Learning Objectives

After this talk, you should be able to:

- *Explain the problems PQ/CMC program intends to solve and how*
- *Identify the Goals, Objectives, and Scope of PQ/CMC*
- *Describe the process used to develop the PQ/CMC data standard*
- *Understand stakeholder outreach taken by PQ/CMC*
- *Discuss current and future work*
- *Recognize where you can find out more*

Why is PQ/CMC needed?

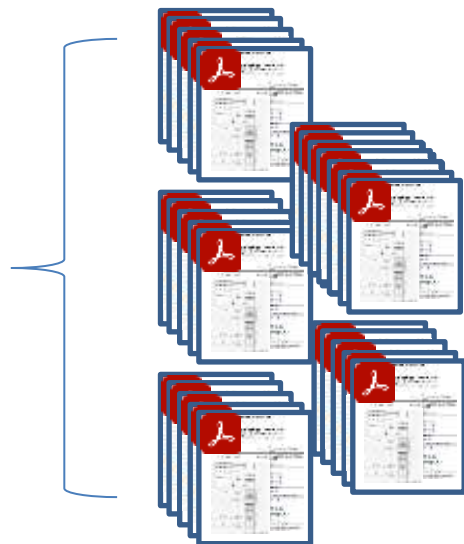
Electronic Common Technical Document - eCTD



Module 3 of the eCTD

Information about Product Quality and Manufacturing and Controls (PQ/CMC)

Module 3 Information arrives as “electronic paper”



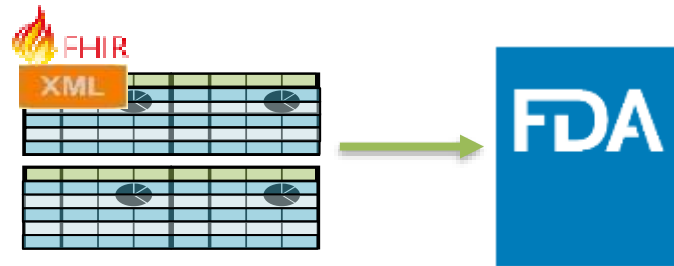
- Unstructured
- Non-standardized
- Manual work to create
- Manual transcription to analyze
- ***Time-consuming***

What is the solution offered by PQ/CMC



Develop a data standard that supports PQ/CMC information that is:

- Consistent in format
- Uses consistent values
- Computable and ready for analysis



Sponsor Benefits:

- Clear format expectations
- Can pre-check content and quality before submission

FDA Benefit:

- Consistent format and values received
- Software-powered analysis, much faster review
- Can check for valid content and data quality on receipt

All Benefit:

- Sponsor submits information *one time*, FDA can use for *many purposes*

What are the core activities of the PQ/CMC Program?



Two overarching goals:

- Determine how to structure Module 3 information
- Work with HL7 to make this an **implementable data exchange standard**
 - Developed using [HL7 FHIR \(Fast Healthcare Interoperability Resources\)](https://hl7.org/fhir/) Data Standard

What is the scope of the PQ/CMC Program?



- Module 3 (and 2.3) information that is amenable to structuring
- FDA Center coverage:
 - CDER (Drug); CBER (Biologics), CVM (Veterinary)
 - Application types: All; Dosage Forms: All

Phases of PQ/CMC standard development: Phase 1



Phase 1

- Specification
- Batch Information
- Batch Analysis
- Stability Study
- Stability Analysis
- Nomenclature of Drug Substance
- Composition of Drug Product
- Batch Formula
- Drug Substance – Control of Materials
- Drug Product – Control of Excipients
- Drug Substance Impurities
- Drug Product Impurities

Foundational concepts:

- Comprehensive definition of every drug product and every substance within a product
- Quality control tests and acceptance criteria for Products, Substances, Excipients and Raw materials
- Formulas for making batches of the drug product including multi-component products such as capsules
- Results of quality testing, stability, and analysis on batches of products and Active Pharmaceutical Ingredients (APIs)
- Details on packaging/containers

Phases of PQ/CMC standard development: Phase 2



Phase 2

Manufacturing
Process, Products:

- Solid Orals
 - Liquids
 - Blood Products
 - Vaccines
 - Cell/Gene Therapy
 - Sterile Product
 - Combinations
- Products
- Transdermal
 - Implants

Drug Substance
Manufacturing
Process, Substances:

- Small molecules
- Biologics

Annual Lot Distribution
Report

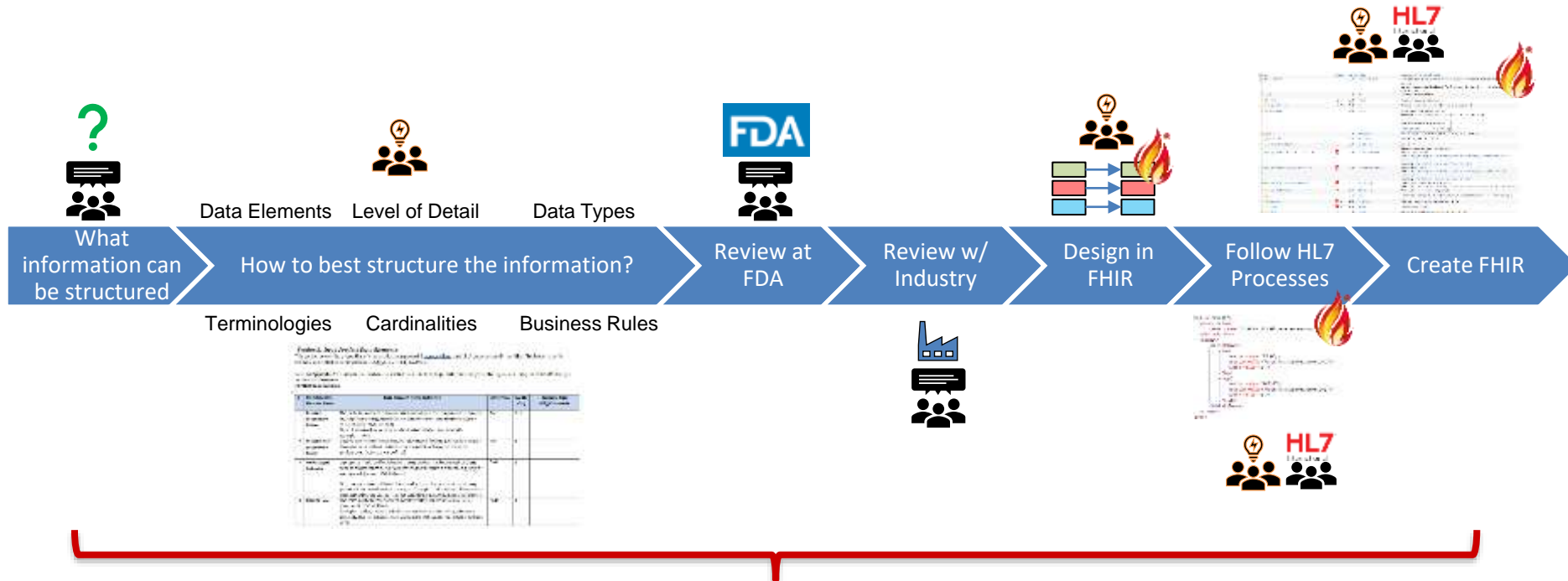
CMC Changes in
Annual Report

Description of manufacturing processes
for drug substances and drug products.

How a manufacturer:

- puts everything together to create the products
- Every step, every mechanism, machine, process, etc.
- What steps takes place at which facility, of which there are many for one product

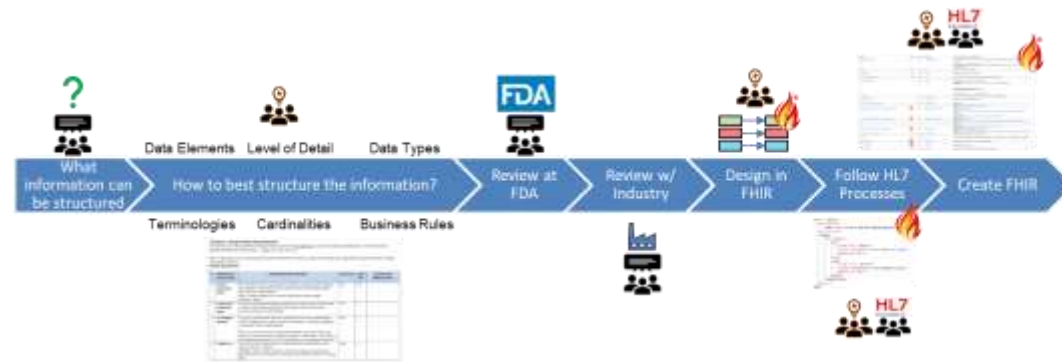
Creating a data standard takes time but doing it right is worth the work




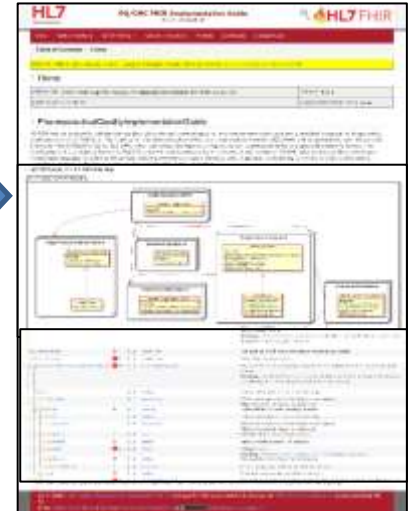
Culmination of work results in the Implementation Guide



PQ/CMC FHIR Implementation Guide




X
Hundreds of data elements and dozens of terminologies



Why use HL7 FHIR?

- Consensus-based standard for public use
- Maximum flexibility to represent data needs exactly
- Much built-in support for PQ/CMC Pharmaceutical Definitions and concepts
 - Propelled at HL7 by FDA PQ/CMC team, EMA, and HealthCanada participants
- Harmonizes with other FHIR development in the same space: i.e., EMA SPOR work on IDMP

Public / Industry outreach is critical to getting this right



| Comment | Response | Status | Date |
|---|---|--------|------------|
| 1. The document is very confusing and difficult to read. It is not clear what the purpose of the document is and what the reader is supposed to do with it. | The document is intended to provide information about the proposed rulemaking process. It is not a final decision and is subject to change. | Open | 10/10/2010 |
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Updates
where
relevant



Public
comments



Draft data structures

Review at FDA

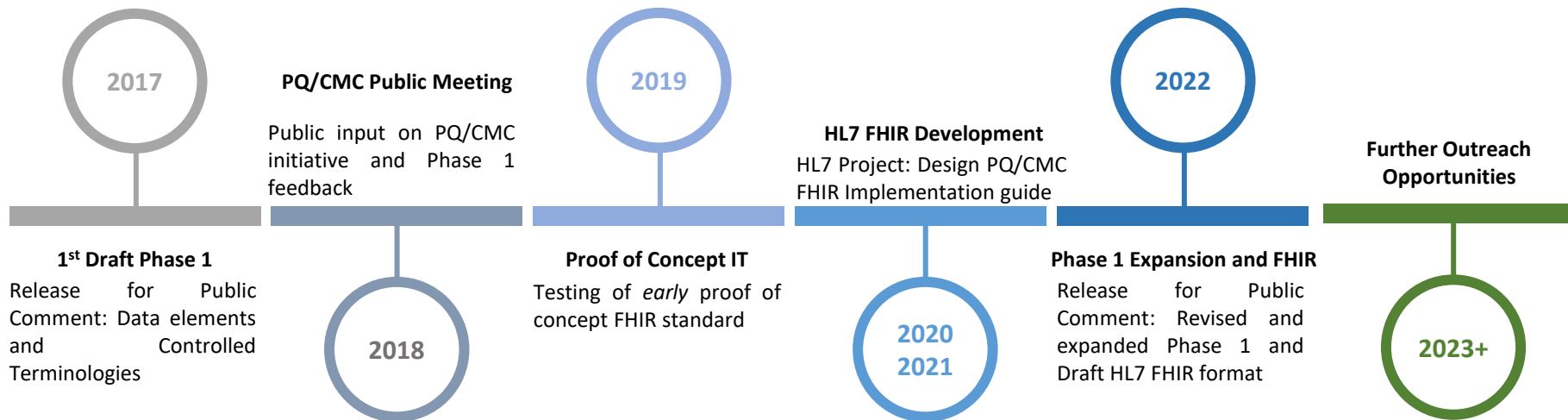
Review w/ Industry



Federal
Register
Notices
asking for
Comment



Public / Industry outreach is ongoing



Where are we now?

- Phase 1 structuring complete
- Phase 2 structuring underway
- Early Draft [HL7 Implementation Guide](#) with Phase 1 information is in development
 - Current draft IG **informational only** as part of HL7 PQ/CMC project
 - Note: **not** final - nor binding - **in any way** (again, informational only)
 - Revisions and additions expected as Phase 2 structuring, after public comment, gets represented as FHIR

Where are we heading?

- Completion of Phase 2 structuring
- Decisions on “staging” (what parts of PQ/CMC to implement and when)
- We anticipate future rounds of Industry-participation pilot testing
- Continue outreach efforts and capture public comments to ensure pertinent stakeholder input are reflected in the PQCMC standard

How can you learn more?

- [PQ/CMC Project Page](#) at FDA.gov
- Continued releases of more structured parts of PQ /CMC for public comment
- PQ/CMC [FHIR project page](#) at HL7
 - Biomedical Research and Regulatory (BR&R) workgroup
- Contact us: PQ-CMC@fda.hhs.gov

Thank You!