U.S. FOOD & DRUG ADMINISTRATION

Working Together to Increase Access to Generic Drugs

Darby Kozak, PhD
Deputy Director
Office of Generic Drugs | CDER | U.S. FDA

Generic Drugs Forum
April 9, 2025

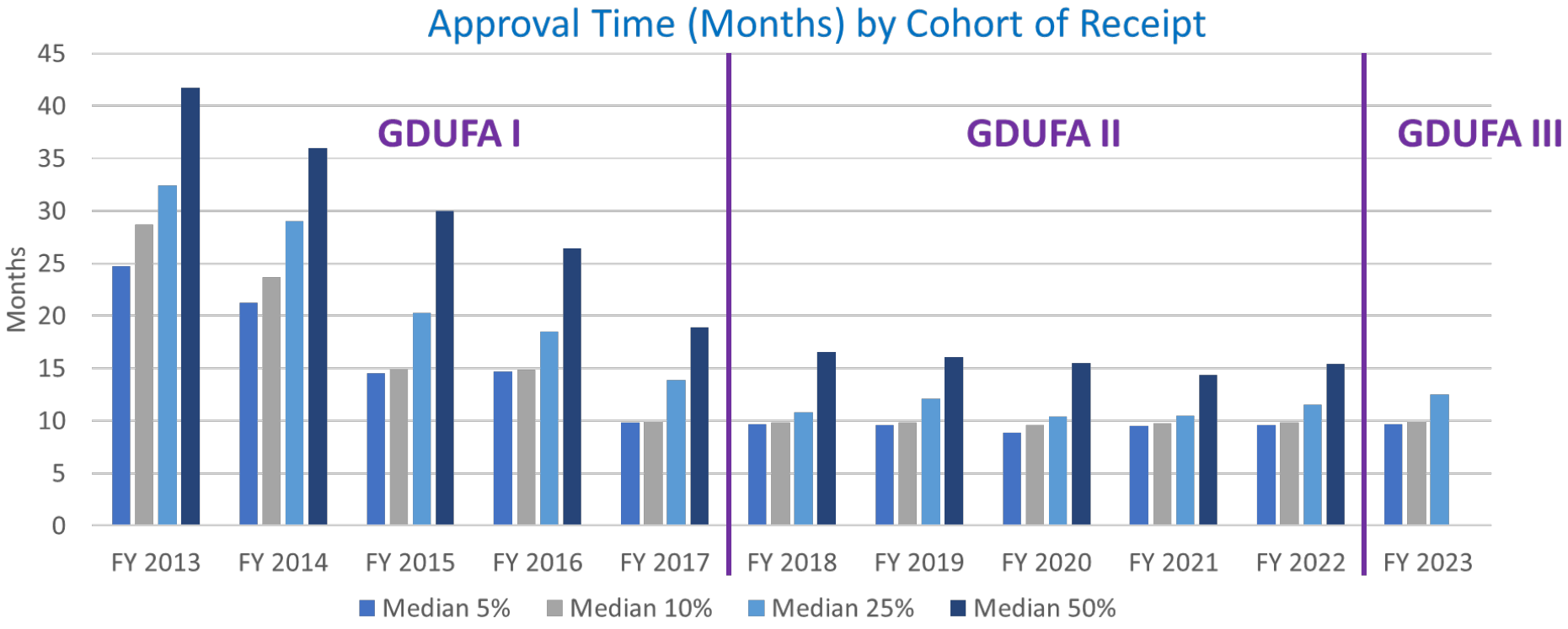
Agenda

- State of the Generic Drug Program
  - 2024 Abbreviated New Drug Application (ANDA) Approvals
    - A Notable 2024 First Generic: Bupivacaine Liposomal Injection
      How research and guidance translates to generic access
- Facilitating Access to Generic Drugs: Initiatives and Efforts
  - Increased Transparency Pilot for ANDAs with Missed Goal Dates
  - Bioequivalence Study Protocol Review Product Development Meetings
  - Helpful Webinars and Other Resources for Generic Drug Manufacturers
- Importance of Data Integrity

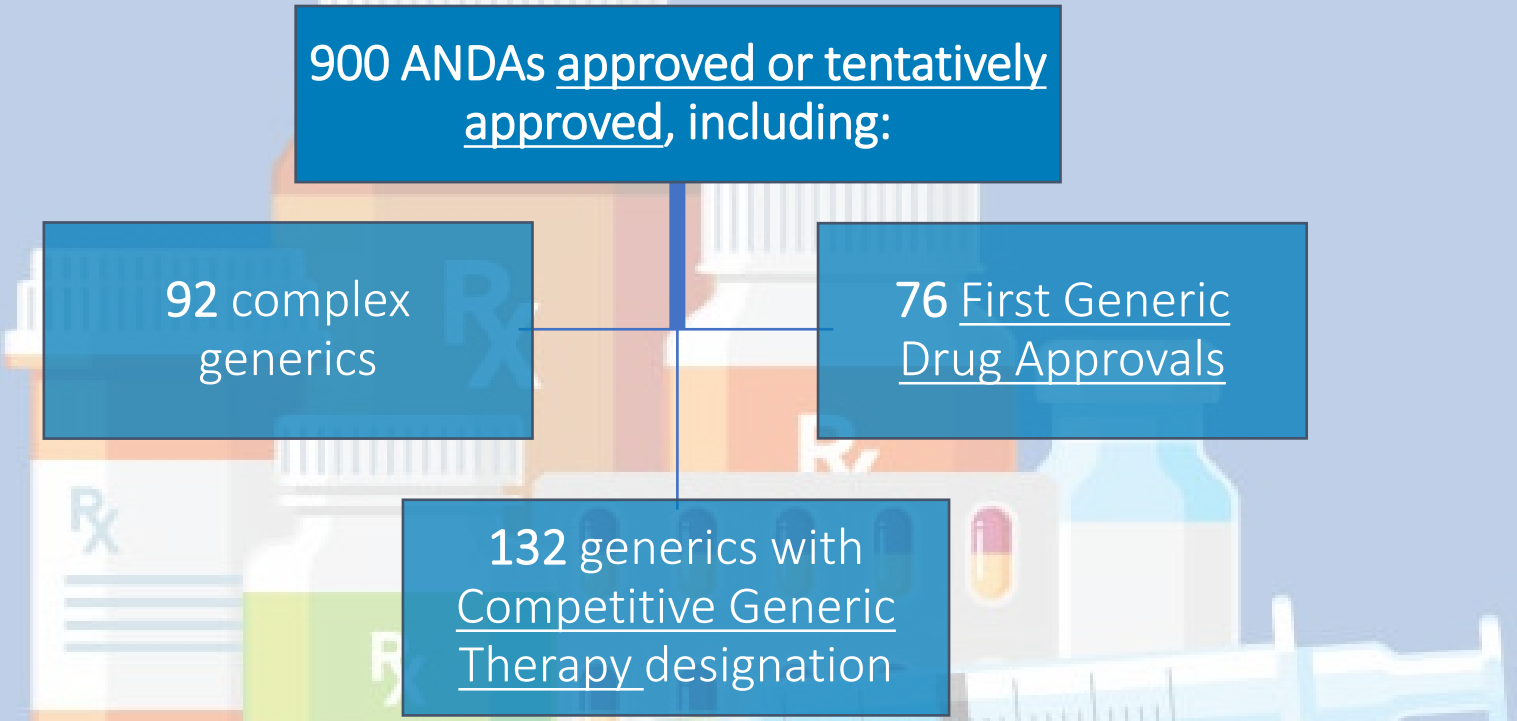
The Value of Generic Drugs

- Substitutable for brand-name drugs
- Held to the same rigorous FDA quality standards as brand-name drugs
- Increase patient and consumer access to needed treatment through
  - ✓ diverse manufacturers, increased production, wider availability, and
  - ✓ mitigation of shortages

State of the Generic Drug Program: GDUFA Accelerates Access to Generic Drugs



State of the Generic Drug Program: Generic Approvals 2024 Calendar Year



Notable First Generic: Bupivacaine Liposomal Injection

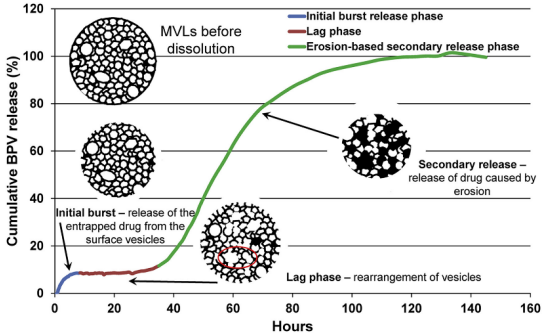
How Research and Guidance Translates to Generic Access

Oct 28, 2011
Approval of Reference Listed Drug, Exparel®, a locally acting complex multivesicular liposomal injection for post-surgical, non-opioid pain management

Nov 2016
Initiation of FDA internal GDUFA research study assessing critical quality attributes (CQAs) that impact drug release

Feb 2018
FDA posts Product-Specific Guidance on Bupivacaine Liposomal Injection recommending an in vivo PK study and comparative CQA testing

Jan 2019
J of Control Release 294, 279-287



Sept 2020
GDUFA research study on assessing analytical methods to measure CQAs and non-clinical pharmacokinetics

May 2023
Inter J of Pharm 639, 122952
Feb 2024
Pharma Research 41 (2), 293-303
Coming soon
Drug Delivery and Translational Research

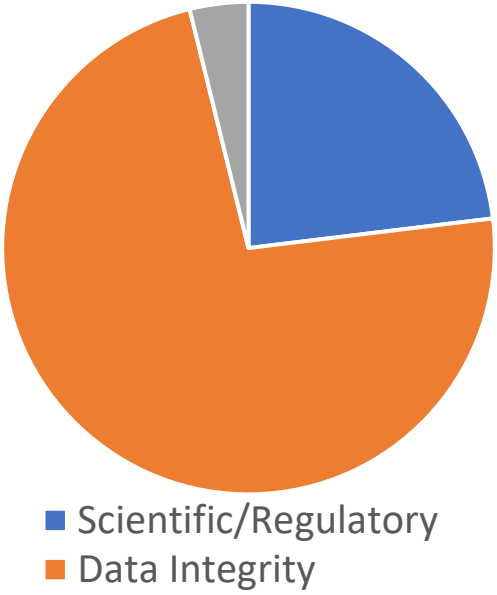
July 1, 2024
Approval of first generic, ANDA 214348, a Competitive Generic Therapy


FDA
We advance research
to accelerate access to generic drugs.
WE ARE THE GENERIC DRUG PROGRAM

Increased Transparency Pilot for ANDAs with Missed Goal Dates

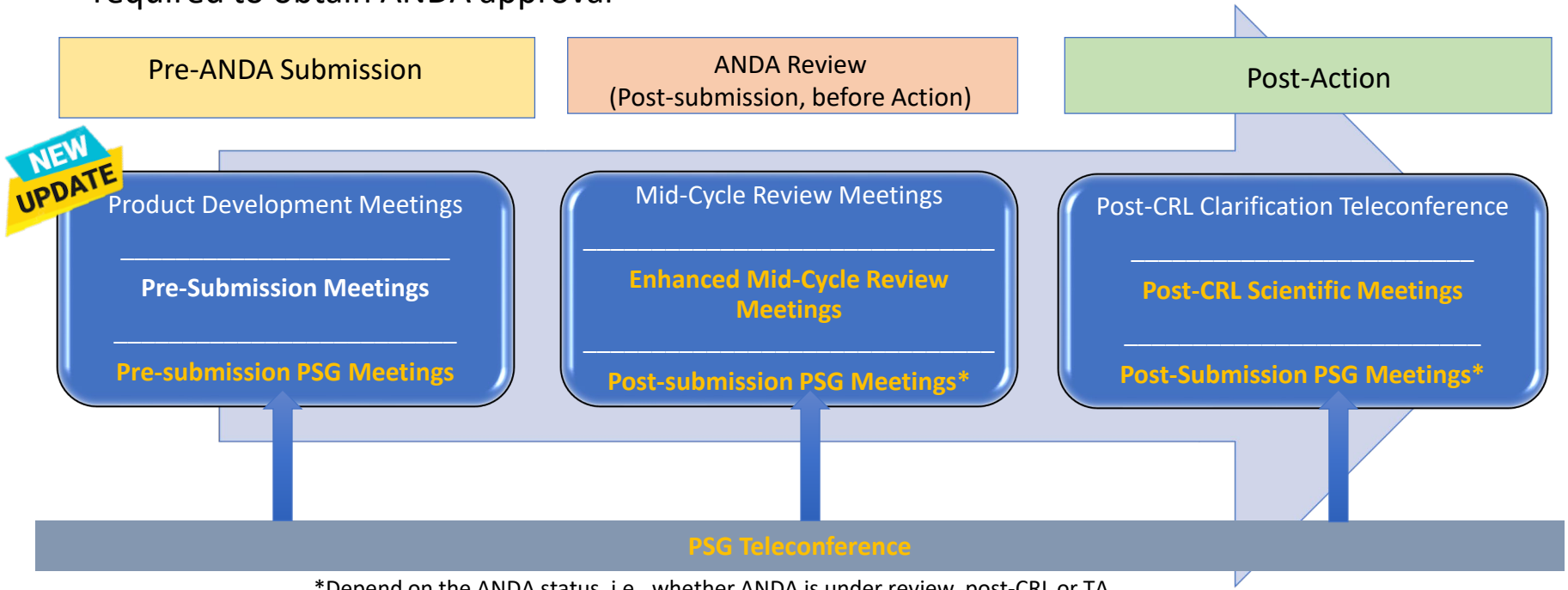
- **Goal:** Provide applicants more clarity, where possible, about the nature of the issue delaying action on an ANDA that is more than 60 days past goal date but has not received a complete response, approval, or other action.
- We aim to provide information on:
  - Which discipline (e.g., Bioequivalence, Quality, etc.) may be affected
  - If the issue is a general issue impacting all ANDAs referencing an RLD, or specific to just the applicant's ANDA
  - Estimated timeframe the issue will be resolved

Six Month Update



Facilitating Access to Generic Drugs: GDUFA III Meetings

- Assist applicants in developing more complete, quality submissions
- Provide targeted, robust advice to applicants to reduce the number of assessment cycles required to obtain ANDA approval



*Depend on the ANDA status, i.e., whether ANDA is under review, post-CRL or TA Action: CR, TA or AP, (during filing, RTR)

Enhancing Engagment with Industry: Bioequivalence Study Protocol Review Inquiries

Bioequivalence protocol inquiries can be submitted within a pre-ANDA product development meeting package.

Early engagement with the Agency regarding specific intricate bioequivalence protocol-related questions may **improve ANDA assessment efficiency and increase the likelihood of first cycle approval**.

Prospective applicants are encouraged to contact PreANDAHelp@fda.hhs.gov using “Bioequivalence Protocol Review Inquiry” in the subject line.

New Resource Page for Applicants

https://www.fda.gov/drugs/abbreviated-new-drug-application-anda/helpful-webinars-and-other-resources-generic-drug-manufacturers

Webinars and Other Resources for Industry

(Topics arranged alphabetically)

- Bioequivalence
  - Bioequivalence Studies: Overview and General Considerations
  - Inactive Ingredient Database and Maximum Daily Dose
  - Nasal and Inhalation Products
  - Oral Products
  - Parenteral (Injection), Ophthalmic, and Otic Products
  - Sample Retention
  - Topical and Transdermal Products
- Communication with FDA: Pathways and Best Practices
- Comparative Analysis for Drug-Device Combination Products
- Data Integrity
- Labeling
- Pharmacology/Toxicology
  - Excipients and Impurities
  - Nitrosamines
- Product-Specific Guidance (PSG)
- Quality (Manufacturing, Drug Substance, and Microbiology)
- Risk Evaluation Mitigation Strategy (REMS)
- Additional Resources on Published Webinars, Seminars, and Workshops


We care about enhancing access to generic drugs
WE ARE THE GENERIC DRUG PROGRAM

Data Integrity Issues Impact Everyone

FIRST OPINION

The FDA should withdraw approval of more than 400 tainted medicines

By Suzanne B. Robotti Aug. 12, 2024

MANUEL BALCE CENETA/AP

When the FDA learned that a testing facility in India had submitted fraudulent data for more than 400 drugs (most of them generics), the agency should have withdrawn them from the market. Instead, it has allowed these drugs to continue to be prescribed and distributed for at least a year as the pharmaceutical companies retest them for equivalency to the original brand-name drugs.

CBS MORNINGS

Ranbaxy whistleblower reveals how he exposed massive pharmaceutical fraud

GENERICS BULLETIN
CITELINE COMMERCIAL

Generics Bulletin >> Policy & Regulation >> Regulation

Another One Bites The Dust: FDA Finds 'Significant' Data Integrity Breaches In CRO Raptim Studies

The FDA Analyzed BE Studies Conducted Between 2019 And 2023

02 Apr 2025 • By Urtė Fultinavičiūtė

CBS MORNINGS

Allegations of widespread fraud raise questions about the safety of generic drugs made overseas

May 10, 2019 / 7:39 AM EDT / CBS News

Data Integrity Reminders

FDA requires high-quality data that is accurate, consistent, and reliable.

FDA and OGD require industry to maintain the integrity of data throughout the data lifecycle.

Lost productivity as well as reduced access and confidence in generics

Create a Quality Culture

Inform FDA of any data quality concerns promptly.

Do not use a supplier with questionable quality practices.

Think beyond inspections.

Highlighted 2024 Draft Guidance: Data Integrity for In Vivo Bioavailability and Bioequivalence Studies

- Provides recommendations to applicants and testing site management on achieving and maintaining data integrity for the clinical and bioanalytical portions of bioavailability (BA) and bioequivalence (BE) studies.
- Data integrity concerns can impact application acceptance for filing, assessment, regulatory actions, and approval, as well as post-approval actions, such as therapeutic equivalence ratings.
- Issued as part of our Drug Competition Action Plan, which seeks to improve the efficiency of the generic drug development, review, and approval process.

Looking to the Future

- Improving submission quality, eliminating data integrity issues, and increasing ANDA assessment cycle efficiency.
- Continue facilitating access to high quality generic drug products
  - Advance research that removes scientific barriers to the development of generic drugs and improves NDA assessment efficiency
  - Continue to develop resources and initiatives that improve transparency and efficiency
    - Your Regulatory Project Manager is your best source of information on your ANDA


FDA
We Are OGD
Ask me why...
"We monitor the safety of generic drugs for as long as they are in the market."
"When I reach for the medicine cabinet, I know I am safe, I am a patient, too!"
www.fda.gov