



Prescription Drug User Fee Act (PDUFA) Reauthorization

FDA and Industry Post-market Safety Subgroup

November 20, 2025 | 1:00pm - 3:00pm

Virtual Format

MEETING PURPOSE

The purpose of this meeting was to continue discussion between FDA and Industry Post-market Safety Subgroups for PDUFA VIII negotiations and to discuss FDA's plans with Sentinel 3.0, review demonstration projects under PDUFA VII, and begin detailed negotiations on specific proposals for PDUFA VIII commitments.

PARTICIPANTS

FDA

Amy Ramanadham	CDER
Jason Bunting	CDER
Bob Ball	CDER
Neha Gada	CDER
Craig Zinderman	CBER

Industry

Katrin Rupalla	PhRMA (Johnson & Johnson)
Mark Taisey	BIO (Amgen)
Lucy Vereshchagina	PhRMA
Ryan Kaat	PhRMA
Annetta Beauregard	BIO

MEETING SUMMARY

This meeting focused on a status update of the PDUFA VII Sentinel demonstration projects and FDA's vision for Sentinel 3.0. FDA provided status updates on the demonstration projects related to pregnancy safety and negative controls. Industry asked questions about the demonstration projects' methodology, learnings, and future applications. The meeting also included an in-depth presentation on Sentinel 3.0 architecture changes and operational model evolution based on publicly available information from the Sentinel 3.0 Synopsis document posted on September 25, 2025.

Topic 1: PDUFA VII Demonstration Projects - Pregnancy Safety

FDA provided detailed updates on the five pregnancy safety demonstration projects currently underway and on schedule for completion by September 30, 2027, as specified in the PDUFA VII Commitment Letter.

Industry inquired about barriers and challenges associated with the progress of these demonstration projects. FDA confirmed successful progress of the demonstration projects and that they are on schedule to meet the PDUFA VII commitment timeline.

Industry inquired about whether there were any learnings from the demonstration projects that were already being applied to postmarket pregnancy safety required studies. FDA clarified that the demonstration projects are not yet complete so there are not yet any lessons learned being broadly applied.

FDA emphasized that the demonstration projects are designed to fill information gaps that historical examples cannot address and confirmed that PDUFA VII commitments remain on track to develop a manual of policies and procedures (MAPP) and framework based on demonstration project results to guide future pregnancy safety assessments.

Topic 2: PDUFA VII Demonstration Projects - Negative Controls

FDA presented detailed information on two negative controls methods development projects, both on schedule and targeting completion by September 30, 2027, as specified in the PDUFA VII Commitment Letter.

FDA explained that negative controls studies emerged from industry requests for Real World Evidence methods that could be applied broadly for both safety and efficacy assessments. FDA and Industry agreed on this approach after discussing multiple proposals during the PDUFA VII negotiations. FDA emphasized that while no specific learnings are available yet, these negative control projects and other methods developed by the Sentinel Initiative promise to create a robust toolbox to increase validity of non-interventional studies.

Industry inquired about how learnings from these safety-focused projects would be communicated more broadly within FDA for efficacy applications. FDA confirmed that there are multiple mechanisms for sharing findings across the Centers for Drug Evaluation and Research (CDER) and Biologics Evaluation and Research (CBER).

Topic 3: Sentinel 3.0 System Architecture and Evolution

FDA presented the statutory foundation for Sentinel, established under the FDA Amendments Act (FDAAA) of 2007, which requires development of a postmarket risk identification and analysis system incorporating data from at least 100 million patients. FDA presented an overview of Sentinel 3.0, highlighting two major architectural changes:

- **Centralized Data Platform:** Transition from the current distributed system, where data partners maintain independent platforms, to a consolidated platform where all data resides centrally

- Direct access to the data by FDA staff: FDA noted that FDA personnel will be able to conduct analyses directly using analytic tools and the consolidated data platform, reducing the need for external methodological support.

Industry inquired about data quality in the new Sentinel 3.0 platform. FDA explained that data quality will be addressed through two approaches: enhanced granular clinical data (lab data, electronic health record narratives) and standardized data quality checks to ensure consistency across the common data model, both of which will be integrated into the new platform architecture.

Topic 4: Resource Allocation and PDUFA VIII Planning

Industry sought clarification on FDA's PDUFA VIII Sentinel proposal, confirming understanding that FDA is only seeking continued funding for maintenance of Sentinel and not enhancements. FDA confirmed this understanding.

A review of FDA resources allocated under PDUFA VI-VII was planned for the December 4th meeting.

Industry raised questions about company access to Sentinel 3.0 data, with FDA noting that access depends on data use agreements, similar to current Sentinel 2.0 arrangements.

Topic 5: Future Negotiations Framework

Industry requested that FDA provide a more detailed PDUFA VIII proposal related to Sentinel to establish a foundation for the next phase of negotiations. FDA accepted this as an action item.

FDA noted that direct costs for Sentinel funding were discussed in the Finance subgroup and requested alignment on Industry positions and timing for financial considerations.

Next Steps

FDA and Industry agreed to discuss at the next meeting the value and benefits of the Sentinel System, resources allocated for the Sentinel System under PDUFA VI-VII, and a more detailed FDA proposal for continued funding for maintenance of the Sentinel System.