United States Food and Drug Administration (FDA) Office of Regulatory Affairs (ORA) Overview

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Disclaimer: The presentation today should not be considered, in whole or in part as being statements of policy or recommendation by the US Food and Drug Administration.

Objectives

- ORA Organization
- ORA roles/responsibilities
- ORA major activities
- ORA experiences
- Useful websites
- Q & A

Protecting Consumers, Promoting Public Health

U.S. Food and Drug Administration

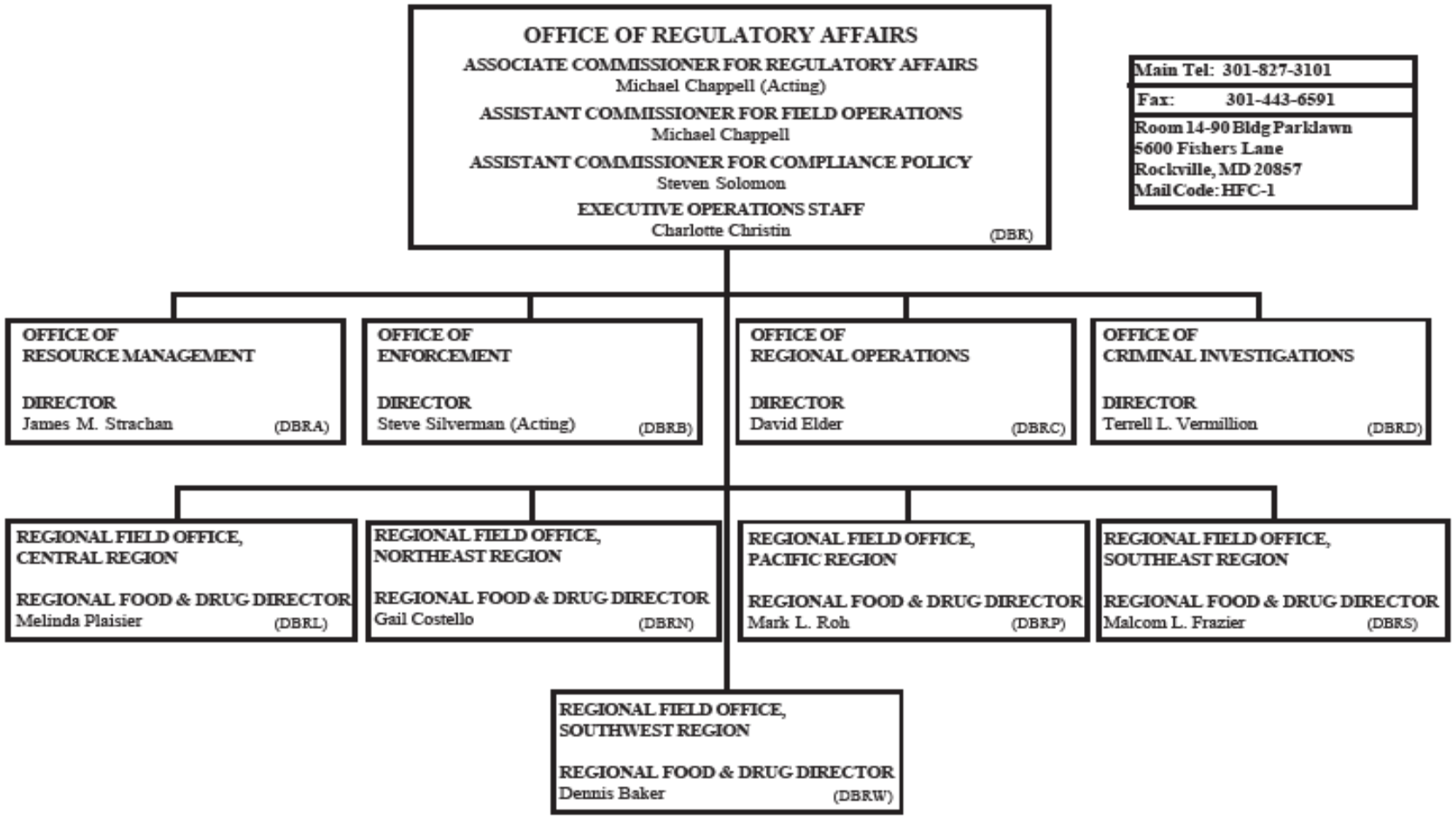
The FDA is made up of 9 Centers

- Center for Biologics Evaluation and Research (CBER)
- Center for Devices and Radiological Health (CDRH)
- Center for Drug Evaluation and Research (CDER)
- Center for Food Safety and Applied Nutrition (CFSAN)
- Center for Veterinary Medicine (CVM)

The FDA is made up of 9 Centers

- National Center for Toxicological Research (NCTR)
- Office of Chief Counsel
- Office of the Commissioner (OC)
- Office of Regulatory Affairs (ORA)

DEPARTMENT OF HEALTH AND HUMAN SERVICES
FOOD AND DRUG ADMINISTRATION
OFFICE OF REGULATORY AFFAIRS



Prepared by the Office of Management Programs, OM - 10/22/08

Broad Responsibilities

Varied Products

$1 Trillion A Year

Varied Approaches

ORA Field Staff Safeguards High Standards

- Regulates almost 124,000 business establishments
  - Which annually produce, warehouse, import and transport $1 trillion worth of consumer goods

ORA Field Staff Safeguards High Standards

- ORA is about 1/3 of FDA's personnel
- Locate in more than 160 office, resident posts and laboratories from coast to coast and in Puerto Rico
- Eyes, ears and the long arm of the agency that ensures the implementation of FDA's high public health standards


FDA In Your Neighborhood
FDA

Consumer Safety Officers (CSOs)

- Conduct about 22,000 domestic and foreign inspections a year
  - to ensure that regulated products destined for the U.S. market meet FDA's standards

Consumer Safety Officers (CSOs)

- Inspections are in firms
  - Before the FDA approves the product
  - To make sure that the firm has the capacity for high-quality production
  - Periodically to ascertain the firm follows appropriate manufacturing processes
- Monitor clinical trials
  - Conducted before the products are submitted to FDA for approval

Scientists

- 13 Laboratories analyze more than 41,00 0 product samples annually
  - To determine adherence to FDA's standards

Scientists

- Analyzed products include samples of the 9.3 million import shipments that are overseen in the nation's ports of entry
  - Imported products that do not measure up to FDA's standards are not allowed on the U.S. market

Public Affairs Specialists (PAS)

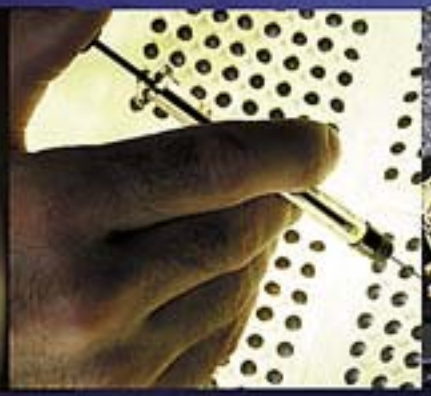
- Reach out to consumer groups, health care professionals and state health authorities
  - To explain FDA policies and encourage compliance with FDA standards

What Does It Cost?

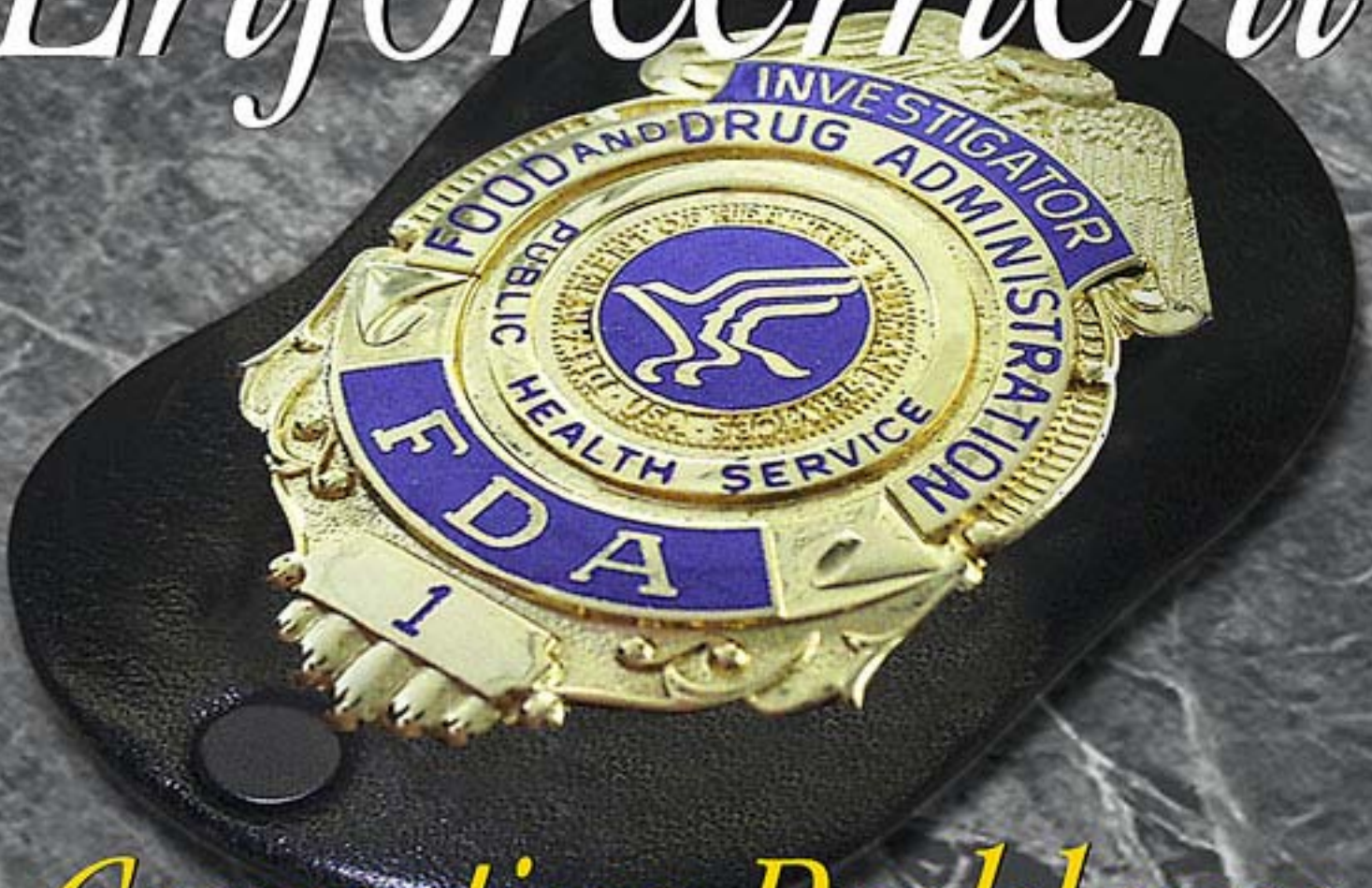
Less than

2¢ a day

How We Do Our Job



Enforcement



Correcting Problems

FDA

The Federal Food, Drug, and Cosmetic Act (also known as the FD&C Act)

- Is the basic food and drug law of the United States.
- It has numerous amendments and is the most extensive law of its kind in the world.
- Many States in the US have laws similar to the Federal law and some have provisions to add automatically any new Federal requirements

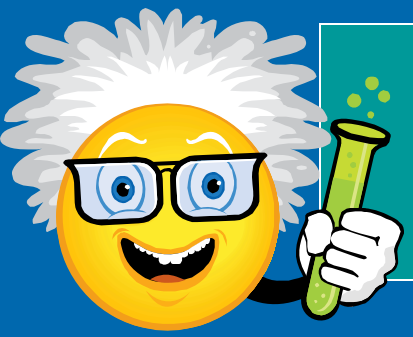
The law's intention

- To assure the consumer that foods are pure and wholesome, safe to eat, and produced under sanitary conditions;
- That drugs and devices are safe and effective for their intended uses;
- That cosmetics are safe and made from appropriate ingredients;
- That all labeling and packaging is truthful, informative, and not deceptive.

Regulations

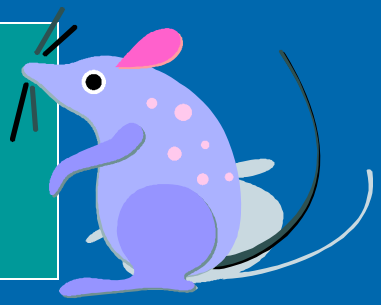
- FDA regulations are an important part of enforcing the Federal Food, Drug, and Cosmetic Act.
- Especially important are such regulations as:
  - Current Good Manufacturing Practice Regulations, aka GMPs which set requirements for sanitation, inspection of raw materials and finished products, and other quality controls

Drug Development: The Simplified View



DISCOVERY

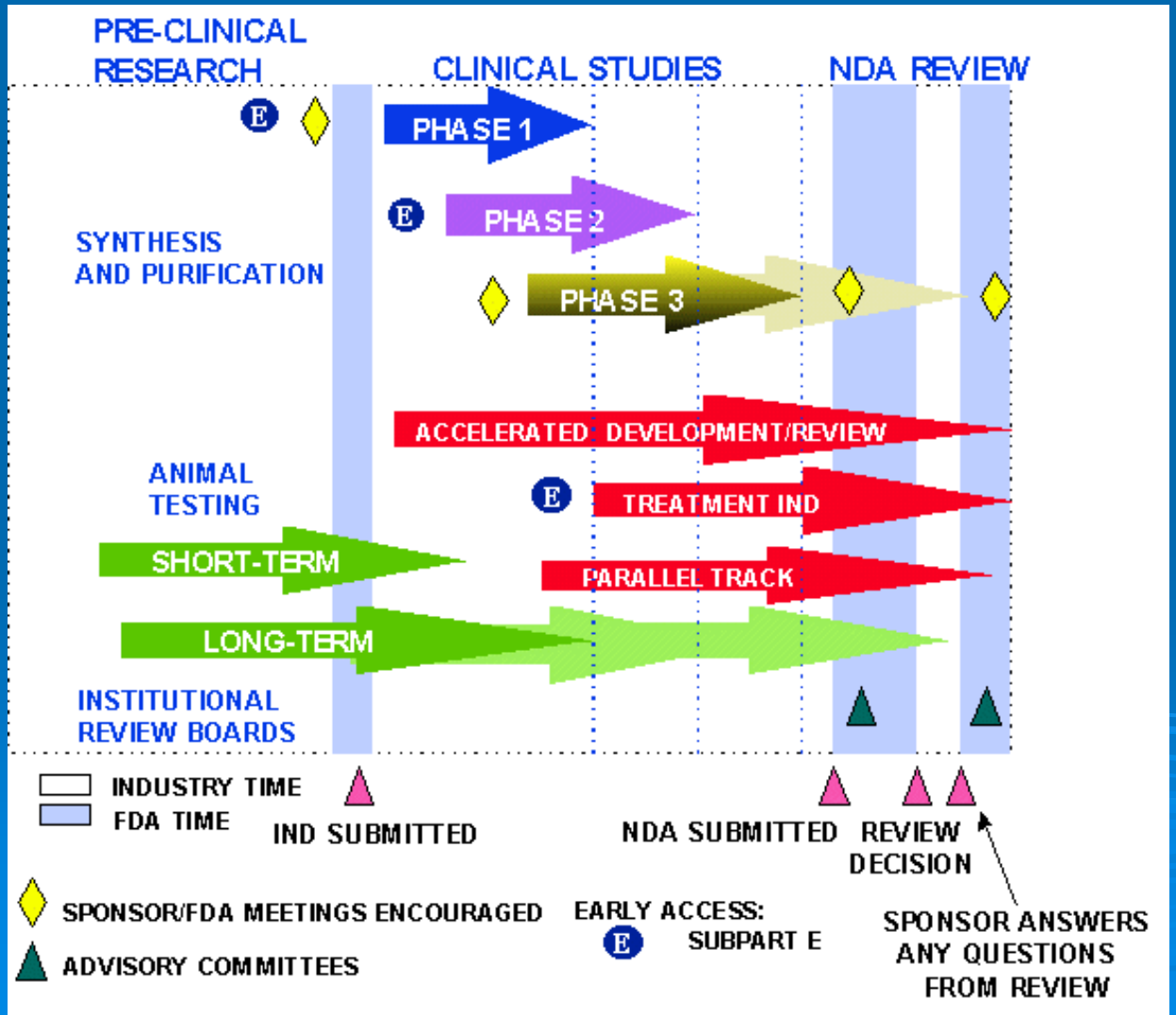
IND



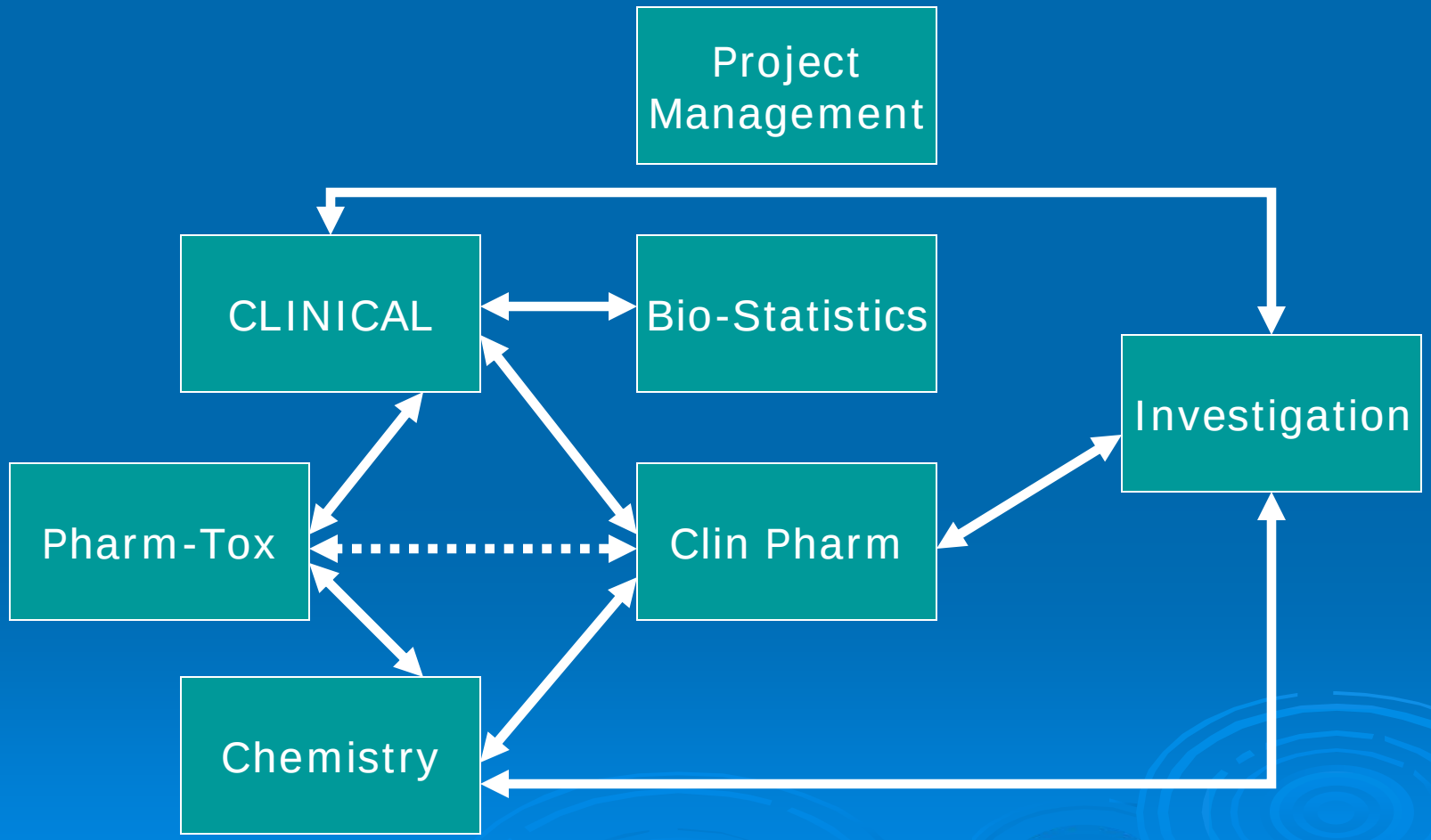
NDA

TO MARKET

US Drug Approval Process



The Drug Review Team



"I found the secret to happiness, but the FDA won't let me release it."

(Reprinted by permission of Cartoon Features Syndicate)

FDA inspects all firms who make drugs to see that they are made under “good manufacturing practices.”

Types of inspection assignments

- Routine
- Directed product specific
- For Cause

Systems Approach

- Quality System
- Facilities and Equipment System
- Materials System
- Production System
- Packaging and Labeling System
- Laboratory Control System

State of Control

- Operating under a State of Control produces finished drug products for which there is adequate level of assurance of quality, strength, identity and purity

Common Manufacturing Problems

- Quality Control procedures not in writing or fully followed
- Production and process controls not followed or documented
- Variability in the characteristics of the drug product

Recalls --Recalling Violative Products

- A recall is a firm's removal or correction of marketed product that FDA considers to be in violation of the laws it administers and against which FDA would initiate legal action; e.g., seizure.

Recalls --Recalling Violative Products

- During a recall, a firm can expect to work more closely with FDA than under almost any other circumstance.
  - In fact, the step, when a product must be recalled, is for the manufacturer or distributor to call the nearest FDA field office and talk with the recall coordinator

Product Recall

- A marketed violative product
- A violation of FD&C Act
- Product has been in distribution channels
- Is subject to legal action by FDA
  - Class I Recall = reasonable probability of serious adverse health consequences/death
  - Class II Recall = may cause temporary or medically reversible adverse health consequences or where probability of serious ones is remote
  - Class III Recall = not likely to cause adverse health consequences

FDA Action for Class I Recalls

- Issuance of public warning/Press Release
- Immediate notification and termination
- Notification to user/consumer level
- Removal of products from consumers
- 100% effectiveness checks

Market Withdrawal

- A marketed product
- Product has been in distribution channels
- A minor/no violation of FD&C Act
- Is NOT subject to legal action by FDA

BIORESEARCH MONITORING
(BIMO)

- A comprehensive program of on-site inspections and data audits designed to monitor all aspects of the conduct and reporting of FDA-regulated research.

BIMO OBJECTIVES

- to ensure that human subjects taking part in investigations are protected from undue hazard and risk.

- to ensure the quality and integrity of data and information supporting premarket submissions

Criteria- Approving Research

- Risks are reasonable in relationship to benefits
- Risks to subjects are minimized
- Selection of subjects is equitable
- Informed consent is documented
- All data are monitored

Who we inspect ...

- Clinical Investigators (**CIs**)
- Sponsors, Monitors, and Contract
- Research Organizations (**S/M, CROs**)
  - (includes * Sponsor-Investigators)
- Institutional Review Boards (**IRBs**)
- Nonclinical/Toxicology Labs (**GLPs**)
- In-vivo Bioequivalence facilities (**BEQs**)

Types of inspection assignments

- Routine
- Directed/study specific
- For Cause

Common Problems

- Investigation not conducted in accordance with investigational plan
- Failure to prepare or maintain adequate or accurate case histories with respect to observations and data pertinent to the investigation
- Failure to obtain informed consent from each human subject prior drug administration or conducting study related tests

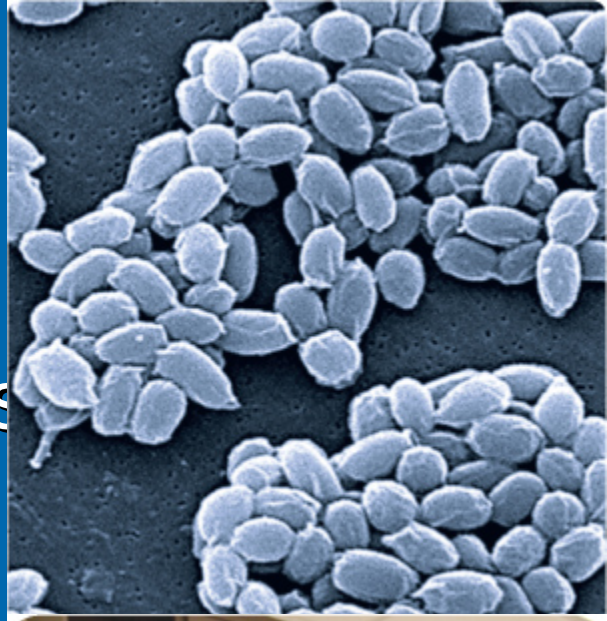
Post-market Surveillance

- Process is not perfect
- Unexpected side-effects
- May change labels, new warnings
- Phase IV Clinical trials

New Hazards
New Laws

2000s

- Anti-Terrorism Responsibilities
- Computers and 21CFR11
- VIOXX
- GXPs and Guidance
- GMPs for Dietary Supplement
- Globalism



Our Challenges

Scientific Breakthroughs

More Sophisticated Products

New Public Health Threats

International Commerce

Consumer Information

Science and the Law

- FDA is a Public Health Agency
- It's mission is to review consumable and medical products people reasonably expect to be safe and effective
- It's a law enforcement agency and a consumer protection agency
- Laboratory results submitted to FDA must be true, verifiable, and repeatable
- Lying to the FDA is a Title 18 Violation (Fraud against the federal government)

FDA U.S. Food and Drug Administration Department of Health and Human Services

CENTER FOR DRUG EVALUATION AND RESEARCH

Consumer Education: What You Need to Know to Use Medicine Safely

The following consumer education materials can help you work with your health professionals to make the best medicine choices, buy safely, and use medicine so it's as safe and effective as possible.

- Information for Specific Medicines
- Topics

FDA Consumer Education about Medicine Email Alert:

Sign up for the E-mail notification.

Topics

- Antibiotics and Antibiotic Resistance
- Buying Medicine and Medical Products Over the Internet

FDA U.S. Food and Drug Administration U.S. Department of Health and Human Services

Consumer Health Information

Consumer Updates

All Consumer Updates »

SEARCH Consumer Updates by title, topic, or date. go

In the Spotlight

The sources of the *Salmonella* Typhimurium outbreak are peanut butter and peanut paste produced by the Peanut Corporation of America ... FULL STORY »

FDA Web Page on | Understanding | FDA Partners With

Top Consumer Updates as of March 11, 2009

- Warning on Potentially Contaminated Cheese
- Orphan Products: FDA and Rare Disease Day
- A Guide to Safe Use of Pain Medicine
- Reducing Radiation from Medical X-rays
- Improper Use of Skin Numbing Products Can Be Deadly
- Generic Drug Roundup: February 2009
- FDA Web Page on *Salmonella* and Peanut Products
- Food Allergies: Reducing the Risks
- Final Guidance on Genetically Engineered Animals
- Understanding Antidepressant Medications
- Tainted Weight Loss Pills Flagged as Health Risks
- Caution to Dog Owners About Chicken Jerky Products
- Botulism Risk From Ungutted, Salt-Cured Alewives Fish

Key FDA Initiatives

- FDA's Food Protection Plan
- Generic Initiative for Value and Efficiency (GIVE)
- All Key Initiatives

Subscribe to Consumer Updates

Receive via e-mail
RSS Receive via RSS feed (What is RSS?)

Consumer Health Information Partnerships

- Co-Branding Policy Statement
- Ask About Partnerships

Contact FDA

- Send Consumer Update questions or story ideas

Useful Websites

DRUGS

- www.fda.gov/cder/about/smallbiz/default.htm
  - (Center for Drug, small business assistance)
- www.fda.gov/cder/drls/default.htm
  - (Drug Registration and listing)
- www.fda.gov/ola/drugsonline.html,
  - (Selling drugs on internet, Statement by Janet Woodcock, MD, Director of CDER, before the Sub committee on Oversight & Investigations, Committee on Commerce,dtd 7/30/99)
- www.fda.gov/cder/workshop.htm
  - (up coming drug workshop information)
- http://www.fda.gov/cder/directories/reference_guide.htm
  - Quick Index to general Subjects of Interest Related to Drug Regulation, includes telephone #s)

Useful Websites

DEVICES

- http://www.accessdata.fda.gov/scripts/cdrh/cfdocs/cfReferral/referral.cfm
  - (telephone #s for device information)
- www.fda.gov/cdrh/dsma/workshop.html
  - (up coming device workshops)

Useful Websites

FOODS

- http://vm.cfsan.fda.gov/~dms/sbel.html,
  - (Small Business Food Labeling Exemption)
- http://vm.cfsan.fda.gov/~dms/supplmnt.html,
  - (dietary supplements)
- http://vm.cfsan.fda.gov/~dms/foodcode.html
  - (restaurant or retail stores. This reference guides retail outlets such as restaurants and grocery stores and institutions such as nursing homes on how to prevent foodborne illness).

Useful Websites

IMPORTS and EXPORTS

- www.fda.gov/ora/import
  - (Imports)
- www.fda.gov/ora/compliance_ref/cpg/cpggenl/default.htm#sc110
  - (Exports & Imports)
- www.fda.gov/ora/compliance_ref/cpg/cpggenl/cpg110-100.html
  - (Certification for Exports)
- http://www.fda.gov/oc/guidance/exportguidance.html
  - (FDA Guidance for Industry on: Exports and Imports Under the FDA Export Reform and Enhancement Act of 1996)

Useful Websites

OTHER

- www.fda.gov
  - (FDA home page)
- http://www.fda.gov/oc/history/default.htm
  - (FDA History)
- http://www.fda.gov/opacom/laws/fdcact/fdctoc.htm
  - (FD&C Act)

Useful Websites

OTHER

- http://www.gpoaccess.gov/nara/index.html
  - [Code of Federal Regulations, (CFR) Detailed registration instructions appear in Title 21, Part 207. Good Manufacturing Practices (GMPs) Title 21, Parts 210 & 211. OTC drug review process, Title 21, Part 330. Final drug monographs Title 21, Parts 331-358. Negative "OTC" drug monographs, Title 21, Sections 310.519 to 310.544. Active ingredients that have been prohibited from use in OTC products in advance of the publication of a final monograph, Title 21, Section 310.545].
- http://www.fda.gov/cder/consumerinfo/Buy_meds_online_text.htm
  - (Internet Selling)

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U.S. Food and Drug Administration

www.fda.gov