

FDA-Industry PDUFA V Reauthorization Meeting
January 24, 2011, 10:30am - 4:00pm
FDA White Oak Campus, Silver Spring, MD
Building 31, Room 2442

Purpose

To continue discussion of proposals related to the pilot program for enhanced review transparency and communication, meeting management enhancements, regulatory science, enhanced communication for emerging sponsors, and prior-approval manufacturing supplements.

Participants

FDA

Ed Cox	CDER
Patrick Frey	CDER
John Jenkins	CDER
Chris Joneckis	CDER
Bob Yetter	CDER
Matt Sullivan	CDER
Dave Roeder	CDER

Industry

Kay Holcombe	Genzyme
Sara Radcliffe	BIO
Jay Siegel	Johnson & Johnson
Bob Meyer	Merck
David Wheadon	PhRMA

Pilot Program for Enhanced Review Transparency and Communication

FDA reviewed its revision to this proposal which modified the requirement for a pre-submission meeting from 6 months before submission to 3 months before the date of submission. Industry expressed concern that this would still require some sponsors to have a pre-submission meeting before completion of phase 3 trials, and that it would be helpful to have the pre-submission meeting after trial completion. FDA stated that the intent of having the meeting early was to allow sponsors adequate time to address issues raised in the meeting prior to submission. Industry stated that the submission timeframe could be altered if significant changes are necessary, and that 2 months prior to submission was more agreeable. FDA agreed that the pre-submission meeting could occur no later than 2 months from the time of submission, as long as sufficient time was available for the sponsor to make changes to the application.

Industry requested greater flexibility in submitting unsolicited amendments to address application issues that may be identified by FDA during the mid-cycle communication or at the late-cycle meeting. FDA restated that the submission of additional information to address such issues raises questions regarding the completeness of the application at original submission; however, the agency stated that existing practice in handling unsolicited amendments would not change in the pilot program. The review of additional information would follow the Good Review Management Principles and Practices (GRMPs) guidance. The agency agreed to modify the proposal language to indicate that existing practices regarding review of additional information would also apply to applications in this pilot program. Industry agreed with the modification. Industry also requested that FDA add language regarding the scheduling of Advisory Committee (AC) meetings in relation to the PDUFA goal date. FDA stated that, given the availabilities of AC members and review staff, committing to firm timeframes for scheduling AC meetings would be extremely challenging. However, the agency agreed to indicate in the proposal that FDA would attempt to schedule the AC meeting three months (standard) or two months (priority) before to the PDUFA goal date.

Industry requested that the metrics for assessing the pilot program be included in the commitment letter. FDA stated that the usual approach would be to publish the statement of work and allow a public

comment period. FDA stated that it could include metrics that would be used to evaluate the program while still allowing the opportunity for public comment on the statement of work for the evaluation.

Industry also requested the ability to discontinue the pilot program if the assessment demonstrated that the pilot program was not meeting the stated goal of increasing efficiency of the review process. FDA responded that there has never been a program that was discontinued during a PDUFA cycle, and that it could be challenging since the PDUFA agreement is contained within the Congressional record. FDA and Industry agreed to conduct an interim assessment of the pilot program during PDUFA V. After publication of the interim assessment results and a public comment period, FDA would determine whether to continue the pilot program through the end of PDUFA V.

FDA stated that additional drug safety staff capacity would be required to attend the additional meetings and to fully integrate that staff in the review of all applications in the pilot program. FDA stated that the additional staff would address Industry concerns that drug safety staff be integrated earlier in application review (refer to [November 18 minutes](#)) Industry stated that it would consider the proposal. FDA also stated that this proposal would require additional resources associated with data entry and quality systems to update the agency's tracking systems for new goals associated with this pilot program. FDA stated that it would determine that cost as a combined figure with other proposals requiring systems updates.

Meeting Management Goals

FDA proposed expanding the concept of the "Type C2" meeting, where only written responses to a sponsor's questions are provided by the agency, to Pre-IND meetings. FDA stated that this change would more accurately reflect current practice in how Pre-IND meetings are handled. Industry stated that it concurred with the plan to allow sponsors to request written responses only for Pre-IND meetings.

Regulatory Science

Industry acknowledged the staffing request from FDA to fully support the five regulatory science proposals (non-inferiority and adaptive trial designs, patient-reported outcomes, biomarkers and pharmacogenomics, quality-by-design, and meta-analysis). FDA stated that the proposals should be considered as a bundled group, and that it could expand or contract on the commitments related to these proposals depending on the funding level, but they would do so as a group. Industry stated that it needed to continue to discuss the amount companies would be able to fund based upon consideration of activities already underway on some of these proposals and the contribution these proposals would make to driving efficiency in drug reviews, and that the negotiators would respond to FDA's request soon.

Enhanced Communication for Emerging Sponsors

FDA discussed its counter-proposal to Industry's proposed approach (refer to [January 10 minutes](#)) to improve communication with emerging sponsors. To better understand the potential workload that could materialize under this proposal, the agency explained that it conducted an analysis of Pre-IND and End-of-Phase 2 (EOP2) meetings held with sponsors who had no approved product at the time of the meeting. FDA compared these data with meeting workload data to determine the resources required to process and respond to the sponsor requests for clarification and follow-up after a Pre-IND or EOP2 meeting covered by this proposal. Industry disagreed with the agency's workload assessment in answering additional follow-up questions. FDA noted that it estimated an average of a range of workload that the agency could expect to be associated with requests under this proposal, including questions that truly are simple and clarifying as well as questions that require meetings of the review team to discuss and develop the agency's response. In its assessment, Industry also stated that a 45-day

response time is too long for this to be a helpful resource. Industry stated that it would develop a revision to their proposal to attempt to address FDA's concerns.

Prior-Approval Manufacturing Supplements

FDA requested that Industry revisit the proposal to change Prior-Approval Manufacturing Supplements from 4 months to 6. Industry stated that FDA seems to be meeting its PDUFA goal on this issue, and questioned why a change was necessary. FDA stated that the number of foreign inspections is increasing, and that the Department of State requires substantial notification prior to foreign travel. Both factors have caused a decline in the first-cycle approval rate for these submissions which introduces delays in a sponsor's ability to carry out their planned manufacturing changes. Industry stated that its member companies were not supportive of this proposal.