GDUFA II Pre-ANDA Program Updates and Tips for Success - OPQ Perspective

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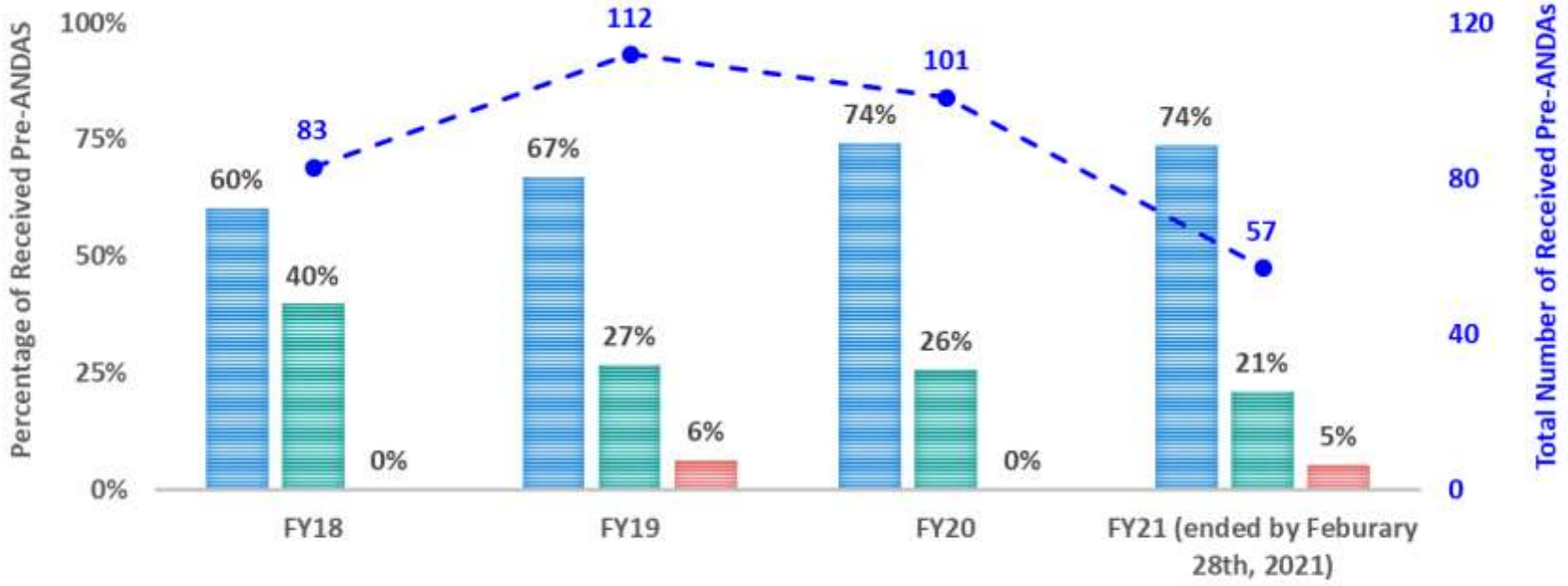
Outline

- Updates on GDUFA II pre-ANDA submissions metrics
- Tips and case studies for pre-ANDA submissions
- Take-aways

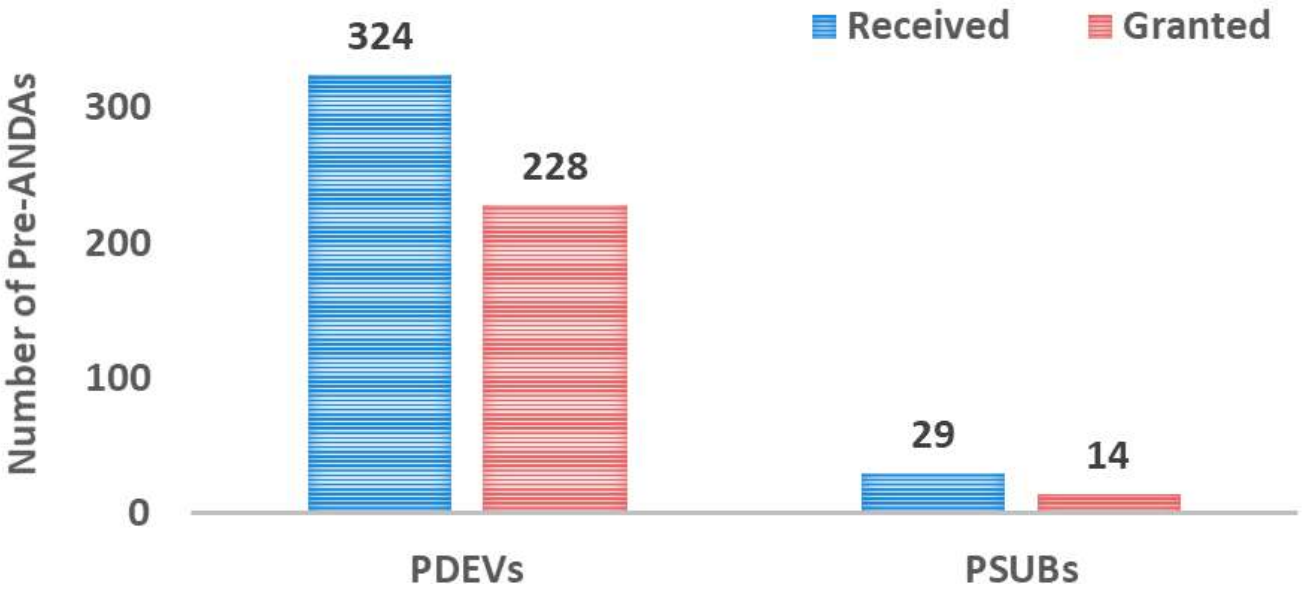
Pre-ANDAs Grant / Deny Trends (As of Feb. 28, 2021)

Total No. of received: 353; Total No. of Granted: 242 (OPQ granted: **208)**



Pre-ANDAs Metrics: PDEV vs PSUB (As of Feb. 28, 2021)

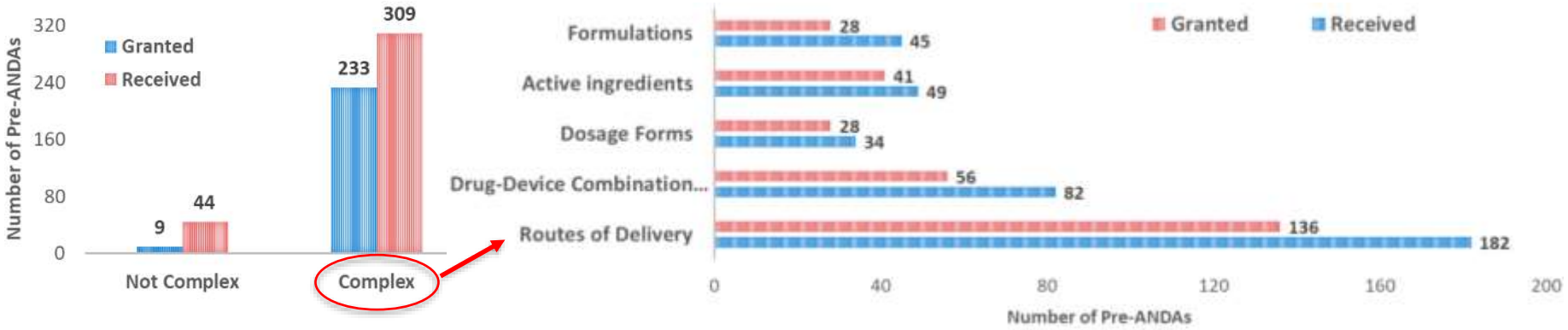
PSUBs: ~ 8% of received pre-ANDAs; ~ 6% of granted pre-ANDAs



Pre-ANDAs Metrics (As of Feb. 28, 2021) by Complex Category

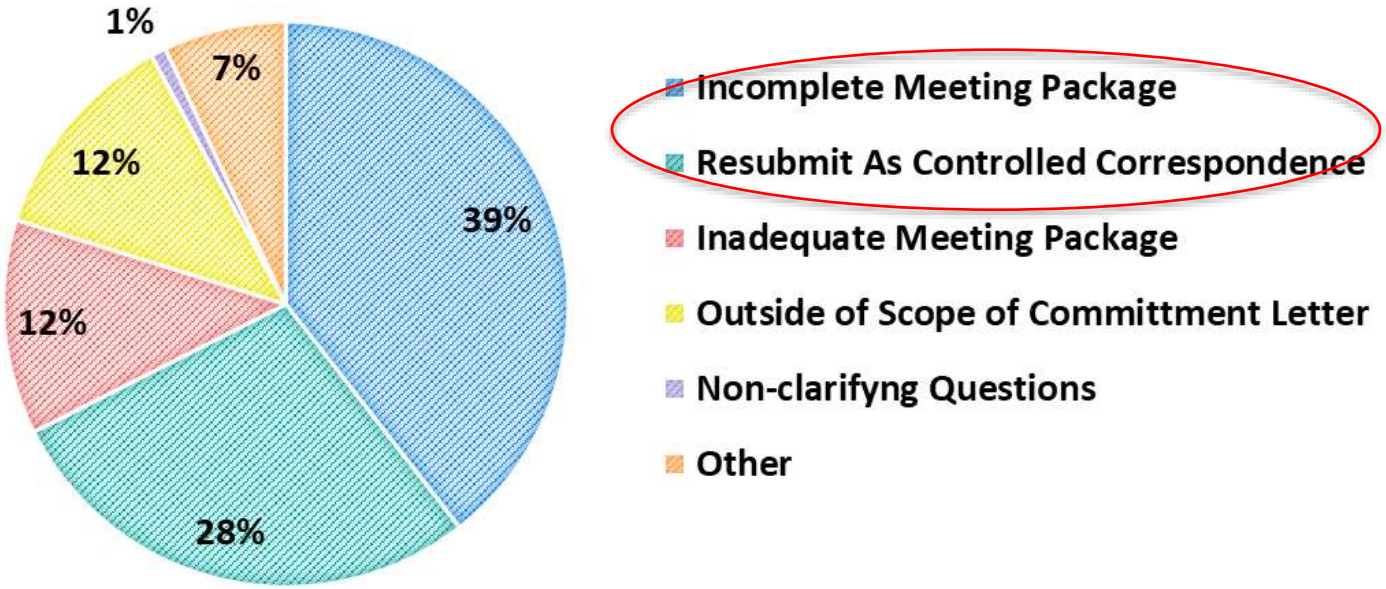
As of Feb 28th, 2021, overall granting rate: 69%

Non-complex products granting rate: 20%*; **Complex products granting rate: 75%**



*: Other products where complexity or uncertainty concerning approval pathway or possible alternative approach would be benefit from early scientific engagement.

Common Reasons for Denial



Tips for PDEVs

- Before submitting, read all applicable guidances and standards
- Ask **specific questions** about your development plan, proposed approach / method, study design, etc.
- Provide **proper justification** and preliminary data (as needed) to support your proposals
- **NO data dumping**
- **Do NOT ask review issues** (e.g., acceptance criteria for specification, acceptability of the study results, …)

Tips for PSUBs

- Before submitting, read all applicable guidances and standards
- **NO question about scientific issues**
- Before submitting, address scientific issues via proper pathways (CC or PDEV) as applicable
- Target timeline for ANDA submission: ~ **within 6 months**
- A concise meeting package: **NO data dumping**
- Overview the ANDA format and content, with a focus on previously identified **complex issues** or **high-risk areas** of the product to ensure that needed studies and supporting information will be submitted in the ANDA.

Optimal Pathway: PDEV vs Standard CC

PDEV	Standard CC
To receive target feedbacks on product development program for an intended ANDA submission	
Response within 120 days	Response within 60 days
• Complex Products defined in GDUFA II Commitment Letter • Other products with complexity or uncertainty concerning approval pathway or possible alternative approach	• All products
• Topic(s) involving multi-disciplines • Questions would NOT be adequately addressed by CC(s)	• Guidance clarification questions • Clarification of ambiguities • ≤ 3 questions per CC

Optimal Pathway: PDEV vs PSUB

PDEV	PSUB
Response within 120 days	
To discuss **specific scientific issues** with product development program, e.g., • Proposed study plan • Alternative approach • Additional study expectations	To discuss ANDA submission **content and format** • Ready to submit (~ 6 months prior to ANDA submission) • Not requiring input on scientific issues

OPQ Grant / Deny Decision Based on…

- Complex products or other products as defined in GDUFA II Commitment Letter
- Including issues assessed by OPQ
- Containing OPQ questions for which a Pre-ANDA will enhance assessment efficiency
- Additional basis for granting a PSUB
  - Containing questions suitable for a PSUB

OPQ Grant / Deny Decision Based on… (Cont'd)

- Additional basis for granting for a PDEV
  - Lack of available guidance that cover issues included in the meeting package
  - Complete meeting package: specific question(s) with justification provided

Case Study 1

Request for a PDEV meeting for a nasal spray solution

OPQ Triage summary:

- Complete meeting package is provided
- Is it a complex product? Yes (drug-device combination product)
- Does the meeting package involve issues assessed by OPQ? Yes
  - Drug product specification acceptance criteria
  - Exhibit batch size recommendation

Case Study 1 (Cont'd)

Request for a PDEV meeting for a nasal spray solution

OPQ Triage summary (Cont'd):

- Does the meeting package contain at least one OPQ question for which a pre-ANDA meeting would significantly enhance assessment efficiency? No
  - Drug product specification acceptance criteria (a review issue, not a proper pre-ANDA question)
  - Exhibit batch size recommendation (can be addressed via Standard CC)

OPQ Grant / Deny Decision: Decline

Case Study 2

Request for a PDEV meeting for an Injection Solution (small molecule API)

OPQ Triage summary:

- Complete meeting package is provided
- Is it a complex product? No (the question seeking guidance on compatibility study plan to support delivery of the proposed product with a few injectors approved / cleared for use with the RLD involves potential drug-device combination product issue)
- Does the meeting package involve issues assessed by OPQ? Yes, compatibility of drug product with delivery systems.

Case Study 2 (Cont'd)

Request for a PDEV meeting for an Injection Solution (small molecule API)

OPQ Triage summary (Cont'd):

- Does the meeting package contain at least one OPQ question for which a pre-ANDA meeting would significantly enhance assessment efficiency? Yes
  - The response requires input from multiple review disciplines (**drug product**, device, **microbiology**, clinical, and policy)

OPQ Grant / Deny Decision: Grant

Challenge Question 1

The applicant plans to submit a PSUB for a generic product of a synthetic peptide injection solution. Which question is suitable for a PSUB?

A. Does the Agency agree on the proposed protocol (Attachment 1) for the adaptive immunogenicity study ?

B. Does the Agency agree the sameness study report to be submitted in Section 3.2.P.2?

C. Does the Agency agree that the proposed orthogonal analytical techniques for sameness study in Table 1 are complete?

Challenge Question 2

The applicant is developing a generic product of an ophthalmic emulsion for which Product Specific Guidance is available. The applicant plans to seek the Agency's clarification on physicochemical characterization tests. Which pathway should the applicant choose?

A. Standard CC

B. PDEV

C. PSUB

Useful Resources

- GDUFA II Commitment Letter - FDA
- Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA Guidance for Industry
- Product-Specific Guidances for Generic Drug Development
- Controlled Correspondence Related to Generic Drug Development Guidance for Industry

Take-aways

- Read all applicable guidance and standards to prepare the meeting packages
- Choose the correct pathway: PDEV / PSUB / CC
- Ask specific questions appropriate for the specific pathway
- Provide sufficient supporting information to justify your position

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OPQ Pre-ANDA Program Steering Committee

All OPQ Pre-ANDA assessors