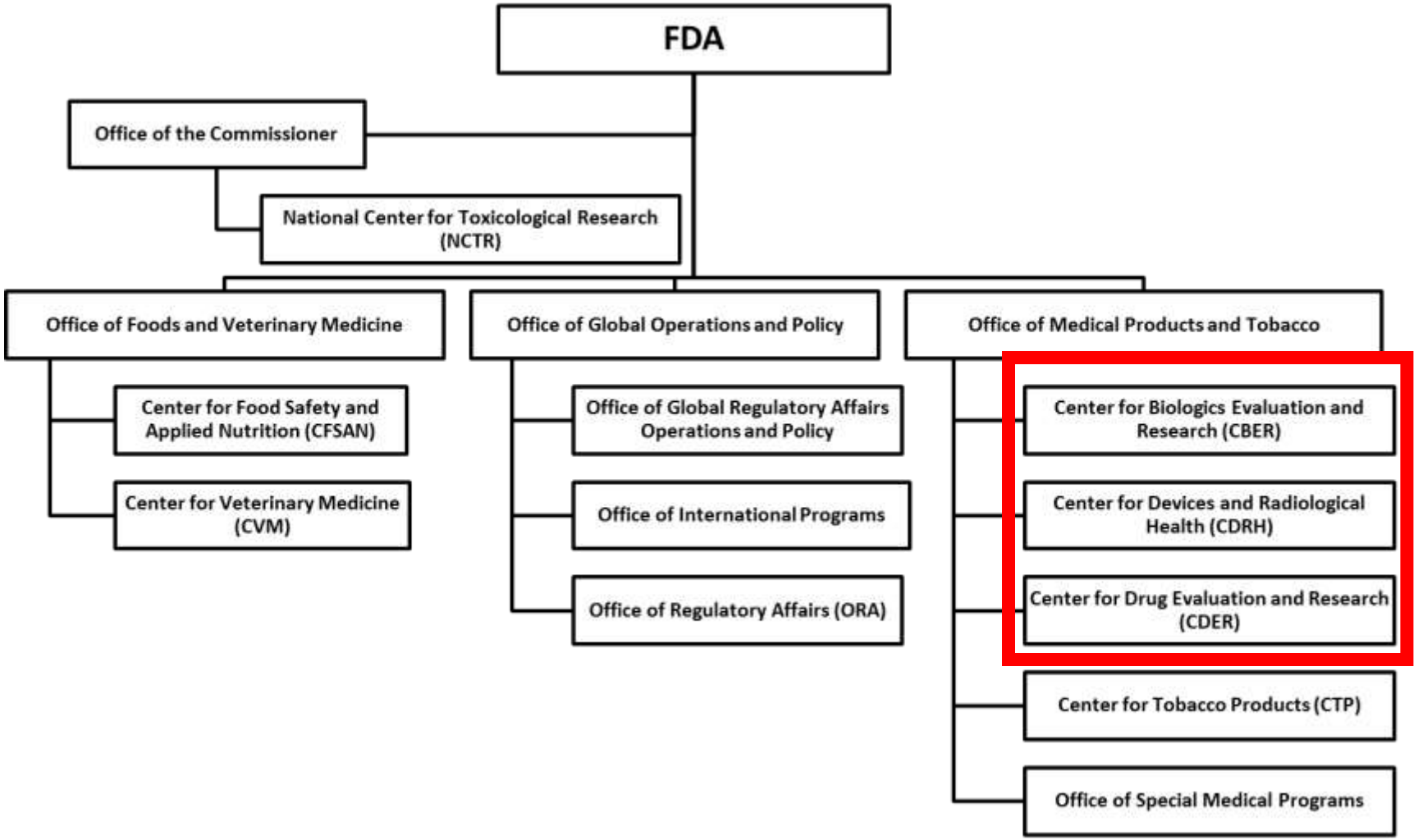
Submissions to FDA Expedited Programs

Niloofar Kennedy
Regulatory Project Manager
Division of Regulatory Project Management
Office of Tissues and Advanced Therapies
CBER

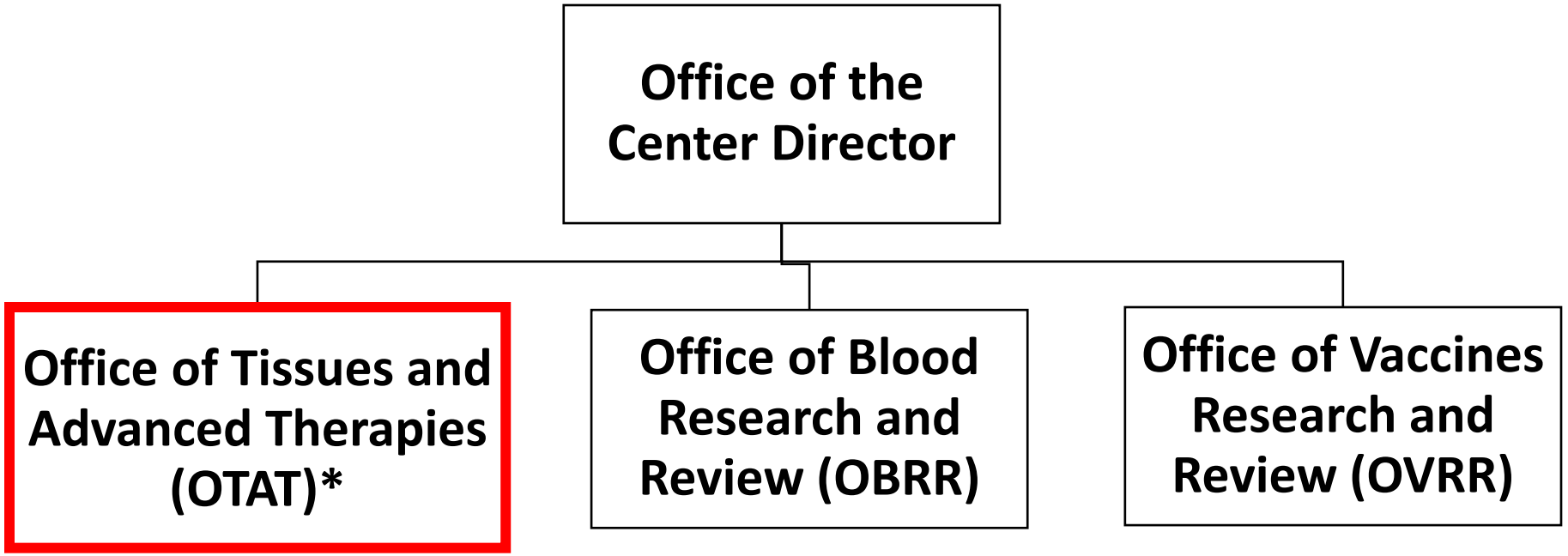
Outline

- OTAT Introduction
- Overview of Expedited Programs
- Useful Links

US Food and Drug Administration

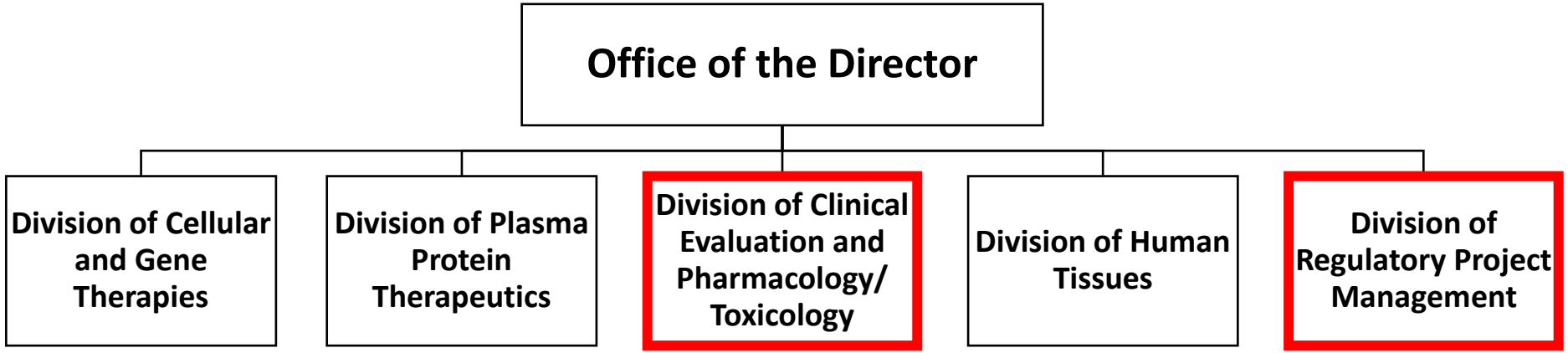


Center for Biologics Evaluation and Research (CBER) - Product Review Offices



*Formerly the Office of Cellular, Tissue and Gene Therapies (OCTGT)

Office of Tissues and Advanced Therapies (OTAT)



Diversity of OTAT-Regulated Products

- **Gene therapies (GT)**
  - Ex vivo genetically modified cells
  - Non-viral vectors (e.g., plasmids)
  - Replication-deficient viral vectors (e.g., adenovirus, adeno-associated virus, lentivirus)
  - Replication-competent viral vectors (e.g., measles, adenovirus, vaccinia)
  - Microbial vectors (e.g., Listeria, Salmonella)
- **Stem cells/stem cell-derived**
  - Adult (e.g., hematopoietic, neural, cardiac, adipose, mesenchymal)
  - Perinatal (e.g., placental, umbilical cord blood)
  - Fetal (e.g., neural)
  - Embryonic
  - Induced pluripotent stem cells (iPSCs)
- **Products for xenotransplantation**
- **Functionally mature/differentiated cells** (e.g., retinal pigment epithelial cells, pancreatic islets, chondrocytes, keratinocytes)
- **Therapeutic vaccines and other antigen-specific active immunotherapies**
- **Blood- and Plasma-derived products**
  - Coagulation factors
  - Fibrin sealants
  - Fibrinogen
  - Thrombin
  - Plasminogen
  - Immune globulins
  - Anti-toxins
  - Snake venom antisera
- **Combination products**
  - Engineered tissues/organs
- **Devices**
- **Tissues**

FDA Expedited Programs

Fast Track

Regenerative Medicine Advanced Therapy

Breakthrough Therapy

Priority Review

Accelerated Approval

	Fast Track Designation
Statute	Section 506(b) of the FD&C Act, as added by section 112 of the Food and Drug Administration Modernization Act of 1997 (FDAMA) and amended by section 901 of the Food and Drug Administration Safety and Innovation Act of 2012

	Fast Track Designation
When to submit	With the IND or after and, ideally, no later than pre-BLA or NDA meeting

	Fast Track Designation
Features	• Actions to expedite development and review • Rolling review

	Fast Track Designation
FDA Response	Within 60 calendar days after receipt of request

Fast Track Designation

Request Content	• In the cover letter of the submission, identification of the submission as a **REQUEST FOR FAST TRACK DESIGNATION** in bold and uppercase letters, the name of the sponsor's contact person and the contact person's address, email address, telephone number, and fax number.
	• If applicable, the IND application number.
	• If available, for drug products, the proprietary name and active ingredient and for biological products, the proper name and proprietary name.
	• The division or office to which the IND is being submitted or in which it is active.
	• The proposed indication(s).
	• A concise summary of information that supports the fast track designation request for the indication being studied, including the following:
	  • The basis for considering the drug to be one intended to treat a serious condition
	  • The basis for considering the drug to have the potential to address an unmet medical need and an explanation of how this potential is being evaluated in the planned drug development program (e.g., a description of the trials intended to evaluate this potential)

	Fast Track Designation
Designation Rescission	Designation may be rescinded later in product development if the product no longer meets the designation-specific qualifying criteria

FDA Expedited Programs

- Fast Track
- **Regenerative Medicine Advanced Therapy**
- Breakthrough Therapy
- Priority Review
- Accelerated Approval

	Regenerative Medicine Advanced Therapy Designation
Statute	Section 506(g) of the FD&C Act, as added by section 3033 of the 21st Century Cures Act

	Regenerative Medicine Advanced Therapy Designation
When to submit	With the IND or after and, ideally, no later than the end-of-phase 2 meeting

	Regenerative Medicine Advanced Therapy Designation
Features	• All breakthrough therapy designation features, including early interactions to discuss any potential surrogate or intermediate endpoints • Statute addresses potential ways to support accelerated approval and satisfy post-approval requirements

	Regenerative Medicine Advanced Therapy Designation
FDA Response	Within 60 calendar days after receipt of request

Regenerative Medicine Advanced Therapy Designation

Request Content	• In the cover letter of the submission specify **REQUEST FOR REGENERATIVE MEDICINE ADVANCED THERAPY DESIGNATION** in upper case and bold. • A description of the investigational product, including a rationale for the investigational new drug meeting the definition of a regenerative medicine therapy; • A discussion to support that the disease or condition, or the aspect of the disease or condition, that the product is intended to treat is serious; • A summary of the risks and benefits associated with the therapies, if any, currently available for this condition; • A description of the unmet medical need that the product has the potential to address; and • The preliminary clinical evidence that the product has the potential to address the specified unmet medical need for this serious condition.

	Regenerative Medicine Advanced Therapy Designation
Designation Rescission	Designation may be rescinded later in product development if the product no longer meets the designation-specific qualifying criteria

FDA Expedited Programs

- Fast Track
- Regenerative Medicine Advanced Therapy
- **Breakthrough Therapy**
- Priority Review
- Accelerated Approval

	Breakthrough Therapy Designation
Statute	Section 506(a) of the FD&C Act, as added by section 902 of the Food and Drug Administration Safety and Innovation Act of 2012 (FDASIA)

	Breakthrough Therapy Designation
When to submit	With the IND or after and, ideally, no later than the end-of-phase 2 meeting

	Breakthrough Therapy Designation
Features	• All fast track designation features, including: Actions to expedite development and review Rolling review • Intensive guidance on efficient drug development, beginning as early as Phase 1 • Organizational commitment involving senior managers

	Breakthrough Therapy Designation
FDA Response	Within 60 calendar days after receipt of request

Breakthrough Therapy Designation

Request Content	• In the cover letter of the submission, identification of the submission in the cover letter as a **REQUEST FOR BREAKTHROUGH THERAPY DESIGNATION** in bold, uppercase letters, the name of the sponsor's contact person and the contact person's address, email address, telephone number, and fax number.
	• If applicable, the IND application number.
	• If available, for drug products, the proprietary name and active ingredient and for biological products, the proper name and proprietary name.
	• The division or office to which the IND is being submitted or in which it is active.
	• The proposed indication(s).
	• A concise summary of information that supports the breakthrough therapy designation request for the indication being studied, including the following:
	  • The basis for considering the drug to be one intended to treat a serious condition
	  • The preliminary clinical evidence that the drug may demonstrate substantial improvement over available therapies.

	Breakthrough Therapy Designation
Designation Rescission	Designation may be rescinded later in product development if the product no longer meets the designation-specific qualifying criteria

FDA Expedited Programs

- Fast Track
- Regenerative Medicine Advanced Therapy
- Breakthrough Therapy
- **Priority Review**
- Accelerated Approval

	Priority Review
Statute	Prescription Drug User Fee Act of 1992

	Priority Review
When to submit	With original BLA, NDA, or efficacy supplement

	Priority Review
Features	Shorter clock for review of marketing application (6 months compared with the 10-month standard review)

	Priority Review
FDA Response	Within 60 calendar days of receipt of original BLA, NDA, or efficacy supplement

Priority Review

Request Content	• In the cover letter of the submission, Identification of the submission in the cover letter as a **REQUEST FOR PRIORITY REVIEW DESIGNATION** in bold, uppercase letters, the name of the sponsor's contact person and the contact person's address, email address, telephone number, and fax number
	• If available, for drug products, the proprietary name and active ingredient and for biological products, the proper name and proprietary name.
	• The proposed indication(s).
	• A concise summary of information that supports the priority review designation request, including the following:
	  • The basis for considering the drug to be intended to treat a serious condition
	  • The basis for the assertion that the drug would be a significant improvement in the safety or effectiveness of the treatment, prevention, or diagnosis of a serious condition

	Priority Review
Designation Rescission	Designation will be assigned at the time of original BLA, NDA, or efficacy supplement filing

FDA Expedited Programs

- Fast Track
- Regenerative Medicine Advanced Therapy
- Breakthrough Therapy
- Priority Review
- **Accelerated Approval**

	Accelerated Approval
Statute	Section 506(c) of Food, Drug & Cosmetic Act (FD&C Act)

	Accelerated Approval
When to submit	The sponsor should ordinarily discuss the possibility of accelerated approval with the review division during development, supporting, for example, the use of the planned endpoint as a basis for approval and discussing the confirmatory trials, which should usually be already underway at the time of approval

	Accelerated Approval
Features	Approval based on an effect on a surrogate endpoint or an intermediate clinical endpoint that is reasonably likely to predict a drug's clinical benefit

	Accelerated Approval
FDA Response	Not specified

	Accelerated Approval
Designation Rescission	Promotional materials Confirmatory trials to verify and describe the anticipated effect on IMM or other clinical benefit Subject to expedited withdrawal

Useful Links

- Guidance for the Industry : Expedited Programs for Serious Conditions-Drugs and Biologics
  - https://www.fda.gov/media/86377/download
- Expedited Programs for Regenerative Medicine Therapies for Serious Conditions
  - https://www.fda.gov/media/120267/download
- Forms & Submission Requirements
  - https://www.fda.gov/drugs/development-approval-process-drugs/forms-submission-requirements
- Formal Meetings Between the FDA and Sponsors or Applicants of PDUFA Products Guidance for Industry
  - https://www.fda.gov/media/109951/download

- FDA Regulation of CBER-Regulated Products
  - https://www.fda.gov/vaccines-blood-biologics/guidance-compliance-regulatory-information-biologics)
- Federal Food, Drug, and Cosmetic Act (FD&C Act)
  - https://www.fda.gov/regulatory-information/laws-enforced-fda/federal-food-drug-and-cosmetic-act-fdc-act
- Best Practices for Communication Between IND Sponsors and FDA During Drug Development Guidance for Industry and Review Staff
  - https://www.fda.gov/media/94850/download

Contact Information

- **Niloofar Kennedy, MS @** Niloofar.Kennedy@fda.hhs.gov
- **Regulatory Questions:**

  OTAT Main Line – 240 402 8190

  Email: OTATRPMS@fda.hhs.gov and

  Lori.Tull@fda.hhs.gov

FDA Headquarters

- **OTAT Learn Webinar Series:**

  http://www.fda.gov/BiologicsBloodVaccines/NewsEvents/ucm232821.htm

- **CBER website:** www.fda.gov/BiologicsBloodVaccines/default.htm
- **Phone:** 1-800-835-4709 or 240-402-8010
- **Consumer Affairs Branch**: ocod@fda.hhs.gov
- **Manufacturers Assistance and Technical Training Branch**: industry.biologics@fda.hhs.gov
- **Follow us on Twitter:** https://www.twitter.com/fdacber