U.S. FOOD & DRUG ADMINISTRATION

GDUFA III

Mid-Cycle Review Meetings and Enhanced Mid-Cycle Review Meetings

April C. Braddy, Ph.D., RAC
Director
Division of Bioequivalence III|Office of Bioequivalence|Office of Generic Drugs|Center for Drug Evaluation and Research

LEARNING OBJECTIVES

To define and outline the changes and additions under GDUFA III for mid-cycle review meetings (MCRMs) and enhanced mid-cycle review meetings (EMCRMs).

To understand the criteria and expectations for requesting MCRMs and EMCRMs for complex generic drug products and competitive generic therapies (CGT) under GDUFA III.

MCRMs and EMCRMs

OUTLINE

- Qualifying Submission Criteria
- GDUFA II versus GDUFA III
- Definition of MCRMs and EMCRMs
- Meeting Request and Evaluation
- Process
- Resources

GDUFA-II TO GDUFA-III CUT-OFF DATE

QUALIFYING SUBMISSION CRITERIA

Applications received (acceptable) on or after **October 1, 2022**, will follow the GDUFA III process

Example (for illustrative purposes):
Name of drug: X
ANDA #: 415230
Date of Application: October 15, 2022
Date (Received) Acceptable for Review: October 15, 2022

CHANGES AND ADDITIONS

GDUFA II versus GDUFA III

	GDUFA II MRCMs	GDUFA III MCRMs/EMCRMs
Meeting Name and Types	‹ Mid-Review Cycle Meeting (MRCM)	‹ Mid-Cycle Review Meeting (MCRM) ‹ Enhanced MCRM (EMCRM)
Meeting Format	‹ Teleconference	‹ Written Response ‹ Teleconference ‹ Videoconference ‹ Face-to-Face
Who initiates the meeting?	‹ Agency schedules meeting and provides agenda items	‹ Eligible ANDA applicants request the meeting and provide agenda items
GDUFA Goal Date Extension	‹ None	‹ MCRM will not extend the goal date ‹ EMCRM will extend the current goal date by 60 days (i.e., 60 days will be added to the current goal date)

DEFINITION

MCRM

Mid-Cycle Review Meeting (MCRM)

- An opportunity for the applicant to ask for the rationale for any deficiency identified in the mid-cycle Discipline Review Letters (DRLs), and/or to ask questions related to FDA's assessment of the data or information in the ANDA.
- An applicant may not present any new data or information at this meeting.
- If granted, the meeting will take place within 30 days after the meeting request is received.
- Relevant DRL(s) response due date will be extended to 15 days after the MCRM is held.

DEFINITION

EMCRM

Enhanced Mid-Cycle Review Meeting (EMCRM)

- An opportunity for the applicant to ask questions related to a proposed scientific path to address possible deficiencies identified in the mid-cycle DRL(s).
- An applicant may ask questions about **potential new data** or information to address any possible deficiencies identified in the mid-cycle DRL(s).
- FDA will discuss the data and information but will not provide substantive assessment of data or information provided by the applicant at the meeting.
- If granted, the meeting will take place within 90 days after issuance of the last mid-cycle DRL.
- ANDA's GDUFA goal date will be extended by 60 days.
- FDA will extend the response due date for the relevant DRL(s) by recalculating the response due date starting from the date of the meeting.
  e.g., if the response was due 30 days after the DRL was issued, it will now be due 30 days after the EMCRM.

DEFINITION

CGT Guidance

Competitive Generic Therapies (CGT) ANDAs

Applicants of an ANDA for a drug product designated as CGT

- May be eligible to request a **MCRM** during the first assessment cycle
- If eligible for a MCRM, the FDA will notify an applicant in the ANDA Acknowledgment Letter **or** the CGT Designation Grant Letter

ELIGIBILTY

MEETING REQUEST

MCRM/EMCRM

Can only be requested during the first assessment cycle

NOTIFICATION

ANDA Acknowledgement Letter or CGT Designation Grant Letter

ELIGIBLE: MCRM/EMCRM

- Complex generic drug product with a granted PDEV meeting
- At its own discretion, FDA may grant these meetings to ANDA applicants that do not meet the criteria in the GDUFA III Commitment Letter

ELIGIBLE: MCRM only

Qualifying CGT ANDAs

PDEV = Product Development Meeting

SUMMARIZATION

MCRM versus EMCRM

	MCRM	EMCRM
Qualification	‹ Complex Generic Product with a granted PDEV meeting ‹ Qualifying CGT ANDAs ‹ At its own discretion, FDA may grant these meetings to ANDA applicants that do not meet the criteria in the GDUFA III Commitment Letter	‹ Complex Generic Product with a granted PDEV meeting ‹ Other ANDAs determined to be eligible by the FDA
Meeting Purpose	‹ To ask for the rationale or questions related to FDA's assessment of the information/data for any deficiency identified in the mid-cycle DRL(s) ‹ No new information/data permitted	‹ To ask questions related to a proposed scientific path to address possible deficiencies identified in the mid-cycle DRL(s) ‹ Questions related to potential new information/data permitted
Meeting Request	Applicant requests meeting <u>within 7 days</u> of issuance of the last mid-cycle DRL	
Meeting Held	No later than day 30 <u>after meeting request date</u>	No later than day 90 <u>after issuance of last mid-cycle DRL</u>
GDUFA Goal Date Extension	None	Current GDUFA Goal Date + 60 days *Unsolicited Amendments can result in an additional goal date extension*
DRL Response Date Extension	Meeting held + 15 days *(relevant DRLs only)*	Meeting held + response time provided in the original DRL *(relevant DRLs only)*
Format	Written Response or Teleconference	Written Response, Teleconference, Videoconference, Face-to-Face
Duration	30 minutes	60 minutes
Preliminary Response	No	Yes

SUBMISSON

MEETING REQUEST

If eligibility has been communicated to an applicant in the ANDA Acknowledgement Letter or CGT Designation Grant Letter, they may, **within 7 days of receiving the last mid-cycle DRL**, submit a request for an MCRM or an EMCRM.

- Last mid-cycle DRL: the latter of the quality DRL and the bioequivalence or clinical bioequivalence DRL.

- Onus is on the applicant to ensure meeting request is submitted within 7 days after last mid-cycle DRL via Electronic Submissions Gateway (ESG).

- Only one meeting package will be accepted.
  - Questions submitted on a rolling basis will not be accepted.

CONTENT AND FORMAT

MEETING PACKAGE

- Meeting Type
  - Applicant should include **"Mid-Cycle Review Meeting Request"** or **"Enhanced Mid-Cycle Review Meeting Request"** in the cover letter.
    - Only one meeting type may be granted.
    - Questions within the scope of a MCRM will be granted if submitted in an EMCRM meeting request
    - Questions within the scope of an EMCRM will be denied if submitted in an MCRM meeting request.
    - Email a courtesy copy of the cover letter to the RPM.
- Meeting Format
  - MCRM: Written Response or Teleconference
  - EMCRM: Written Response, Teleconference, Videoconference, or Face-to-Face
- List of applicant's attendees
- List of specific assessment disciplines requested
- List of questions based on mid-cycle DRLs, grouped by assessment disciplines
- Proposed agenda

MEETING FORMAT

WRITTEN
MCRM and EMCRM

TELECONFERENCE
MCRM and EMCRM

VIDEOCONFERENCE
EMCRM

FACE-2-FACE
EMCRM

GRANT/DENY NOTIFICATION

MEETING REQUEST EVALUATION

- Written notification will be provided with a grant/deny decision.
- The request **may be granted** in part for the questions that are appropriate for the meeting type requested **and denied** in part for the questions that are not appropriate for the meeting type.

DENIED

MEETING REQUEST EVALUATION

- ANDA not eligible for MCRM/EMCRM
  - E.g., if eligibility is not conveyed in ANDA Acknowledgement Letter or CGT Designation Grant Letter
- Request received more than 7 days after the last mid-cycle DRL issuance
- Request received after first assessment cycle
- More than one meeting request submitted

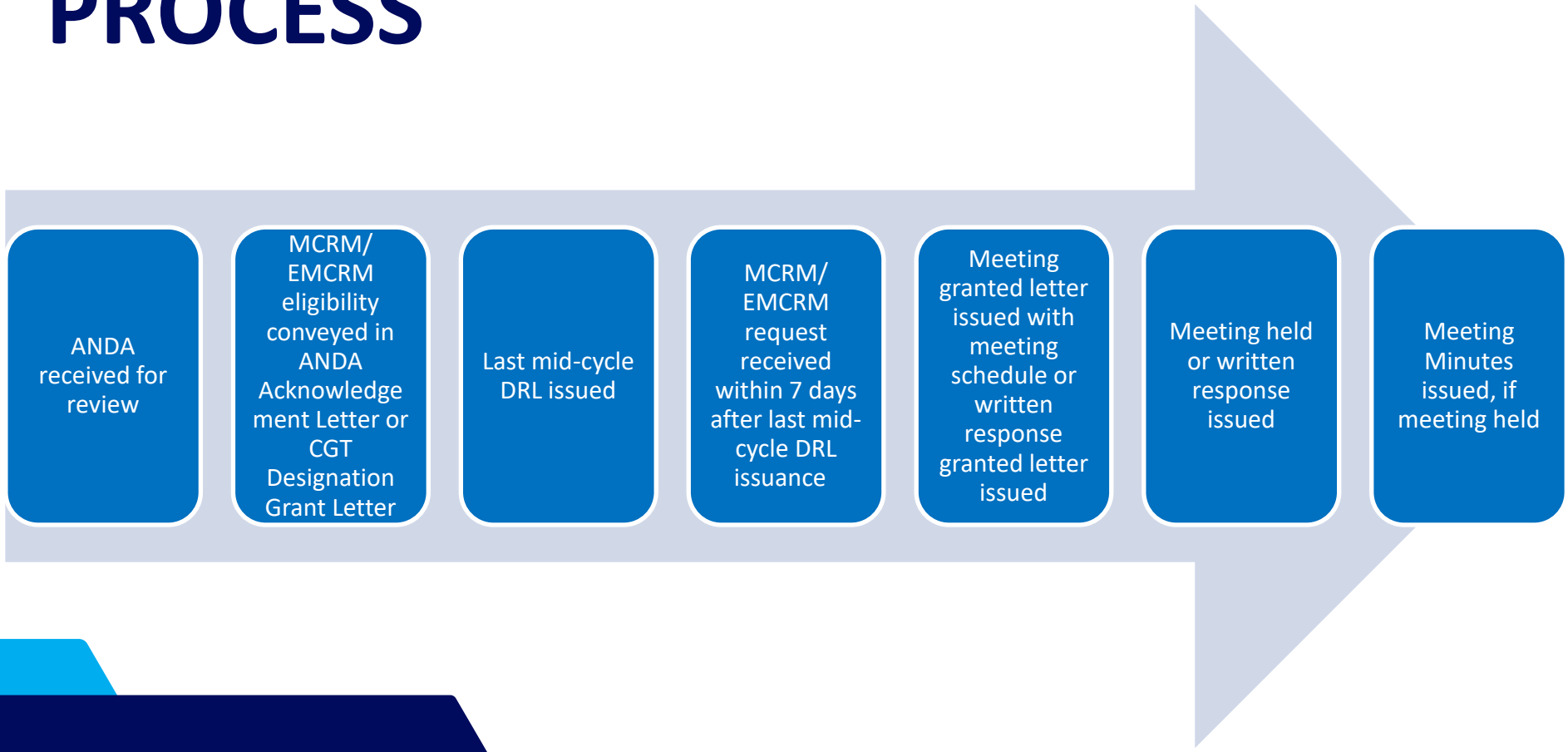
DENIED

MEETING REQUEST EVALUATION

- If the applicant intends to ask questions regarding a DRL in an MCRM or EMCRM, the applicant should **not** respond to the said DRL prior to the meeting.
  - If the response due date for a DRL is before the date by which an applicant must request the MCRM or EMCRM, then the applicant should request an extension to respond to that DRL.
  - If an applicant responds to a DRL any time prior to the MCRM or EMCRM is held or written response is issued, FDA will deny or cancel the MCRM or EMCRM request for the questions related to that DRL.

GRANTED MEETING OR WRITTEN RESPONSE

PROCESS



As of 2/12/2023

The FDA has identified 7 ANDAs that may be eligible to request a MCRM/ EMCRM

PUBICILY AVAILABLE

RESOURCES

COMMITMENT LETTER & GUIDANCES

GDUFA Reauthorization Performance Goals and Program Enhancements Fiscal Years 2023-2027 [1]

Guidance for Industry, *Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA* (October 2022) [2]

Guidance for Industry, *Competitive Generic Therapies* (October 2022)[3]

1. GDUFA III – Reauthorization
2. Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA Guidance for Industry | FDA
3. Competitive Generic Therapies | FDA

Last accessed: 02/09/2023

CHALLENGE QUESTION

Which application type(s) are not eligible for an EMCRM per the GDUFA III Commitment Letter?

A. Complex generic product with a granted PDEV meeting
B. Complex generic product with a denied PDEV meeting
C. Non-complex, CGT MCRM eligible ANDA
D. B and C
E. All of the above

KEY CONTRIBUTORS AND SUPPORT

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Partha Roy, Ph.D.

Office of Bioequivalence (OGD)

Parth Soni, Pharm.D.

Division of Project Management, Office of Regulatory Operations (OGD)

Xuan-Mai "Mai" Nguyen, Pharm.D.

Division of Project Management, Office of Regulatory Operations (OGD)

John Ibrahim, Pharm.D., BCPS

Division of Project Management, Office of Regulatory Operations (OGD)

GDUFA-III MCRM/EMCRM Working Group Members

OGD and Office of Pharmaceutical Quality

CONTACT US

For any questions or concerns, please reach out to the Regulatory Project Manager of your ANDA