

Overview of FDA Split Real Time Application Review (STAR) Pilot Program

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Learning Objectives

- Discuss the background of STAR, including PDUFA VII.
- Describe the STAR Pilot Program.
- Describe the components of the overall STAR program.
- Outline CDER's review of STAR applications.
- Review the STAR website.
- Discuss STAR Pilot Program assessment.
- Review resources for Industry.

Background

Prescription Drug User Fee Act (PDUFA):

- STAR introduced as a new pilot program under PDUFA VII
- Available to applicants beginning in FY 2023 (October 1, 2022)

**PDUFA REAUTHORIZATION PERFORMANCE
GOALS AND PROCEDURES FISCAL YEARS 2023
THROUGH 2027**

**I. ENSURING THE EFFECTIVENESS OF THE HUMAN DRUG REVIEW
PROGRAM**

- A. Review Performance Goals
- B. Program for Enhanced Review Transparency and Communication for NME NDAs and Original BLAs
- C. New Molecular Entity (NME) Milestones and Postmarketing Requirements (PMRs)
- D. Split Real Time Application Review (STAR) Pilot Program**
- E. Expedited Reviews
- F. Review of Proprietary Names to Reduce Medication Errors

Why the new STAR program?



Problem Statement:

Generally, data sets and other application contents are ready in advance of the Clinical Study Report (CSR), Integrated Summary of Safety (ISS), and Integrated Summary of Effectiveness (ISE).

Waiting for the CSR, ISS, and ISE can delay NDA/BLA submission to FDA. Submission of parts of a marketing application in advance of CSR, ISS, and ISE availability may enable earlier access to treatment addressing an unmet medical need.

What is the STAR program?

- A pilot program for qualified priority efficacy supplements
- Submitted in two parts to enable an earlier review and action

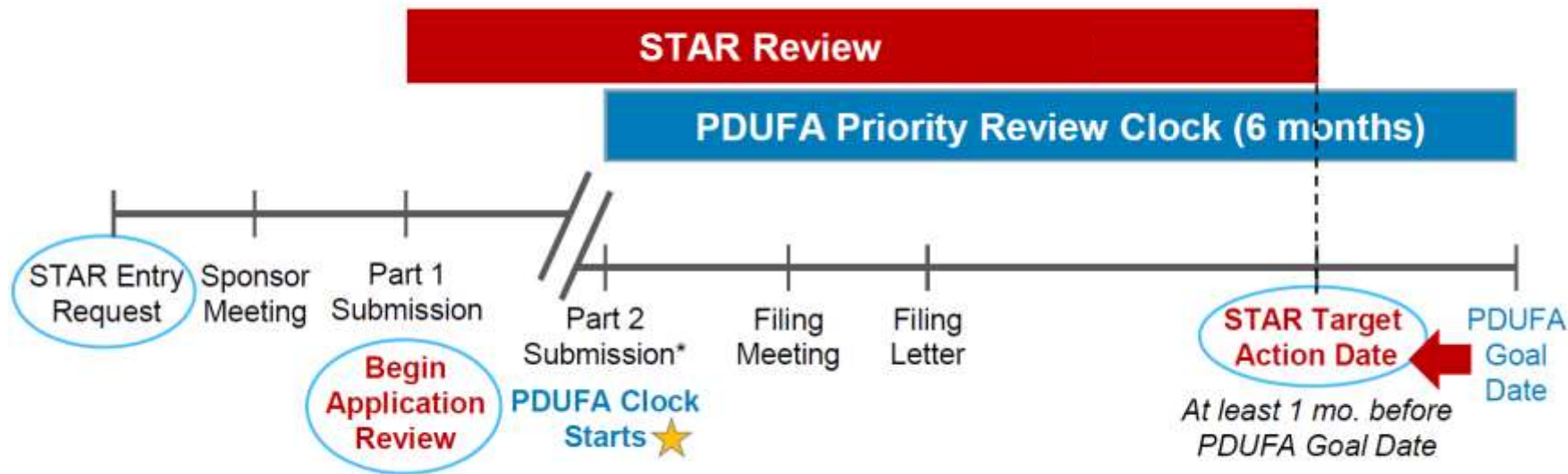
What is the goal of the STAR program?



To shorten the time from the date of complete supplement submission to the action date to allow earlier patient access to therapies that address an unmet medical need.

STAR Overview

STAR Program Shifts Review But Not PDUFA Clock



*The **Part 2** Submission is usually received ~2 months after Part 1, but no more than 3 months after Part 1.

STAR Entry Request: Format



Option 1: Request as stand-alone T-con (no discussion of supplement content/format)

or

Option 2: Request as Part of a Type B pre-sNDA/sBLA meeting (to also discuss supplement content/format)

STAR Entry Request: Content



- Topline results from adequate and well-controlled clinical trials
- Proposed labeling
- Explanation of how the supplemental application meets STAR criteria

STAR Entry Request: Program Acceptance Criteria



1. Clinical evidence from adequate and well-controlled investigation(s) indicates that the drug may demonstrate substantial improvement on a clinically relevant endpoint(s) over available therapies
2. Application is for a drug intended to treat a serious condition with an unmet medical need

STAR Entry Request: Program Acceptance Criteria (continued)

3. No aspect of the submission is likely to require a longer review time
4. No chemistry, manufacturing, or control (CMC) information that would require a foreign manufacturing site inspection

STAR Split Submission: Part 1



- Contains **all** elements of the supplemental application **except**:
 - Clinical study report (CSR)
 - Integrated summary of effectiveness (ISE)
 - Integrated summary of safety (ISS)

STAR Split Submission: Part 1 (continued)



Part 1 submission should also include:

- Tables, Figures, and Listings
- Protocol and amendment(s) for pivotal trial(s)
- Statistical analysis plan and statistical analysis program for pivotal trial(s)
- Sponsor's high-level assessment summary of the safety and efficacy results
- Death summaries

STAR Split Submission: Part 1 (continued)



- If FDA identifies substantive **missing information**, reviews will stop
- *A Revocation of STAR Status* letter may be issued

STAR Split Submission: Part 2



- Contains the CSR, ISE, ISS
- **Timeline:**
 - PDUFA clock starts with Part 2 submission
 - Must be received by FDA no later than 3 months after Part 1 submission

STAR Split Submission: Part 2 (continued)



- If FDA identifies substantive **missing information**, reviews will stop
- *A Revocation of STAR Status* letter may be issued
- *A Refuse to File (RTF)* letter may be issued

STAR Review Summary



- Review begins with the receipt of Part 1 submission
- PDUFA clock starts with receipt of Part 2 submission
- FDA will generally target an “expedited review”, meaning an action at least 1 month before the PDUFA goal date

STAR Resources

Split Real Time Application Review (STAR)

[f Share](#) [t Tweet](#) [in LinkedIn](#) [Email](#) [Print](#)

Development Resources

[Advancing Real-World Evidence Program](#)

[Antibacterial Drug Development Task Force](#)

[BEST Resource Taxonomy](#)

[Clinical Outcome Assessment Compendium](#)

[Complex Innovative Trial Design Meeting Program](#)

[Division of Pediatric and Maternal Health](#)

[FDA Recognized Antimicrobial Susceptibility Test Interpretive Criteria](#)

Under the Prescription Drug User Fee Act (PDUFA) VII Commitment Letter⁽¹⁾, FDA is creating the Split Real Time Application Review (STAR) pilot program.

Overview

FDA is establishing a STAR pilot program, which aims to shorten the time from the date of complete submission to the action date, in order to allow earlier patient access to therapies that address an unmet medical need. The STAR pilot program will apply to efficacy supplements across all therapeutic areas and review disciplines that meet specific criteria. Accepted STAR applications will be submitted in a “split” fashion, specifically in two parts with the components submitted approximately two months apart.

FDA will begin to review the data once the agency receives the complete Part 1 Submission. The PDUFA review clock will start once the agency receives the Part 2 Submission, which will include the final clinical study report(s), the Integrated Summary of Safety, and Integrated Summary of Effectiveness. The program applies to both drugs and biologics, collectively referred to as drug(s). STAR is available for certain supplemental new drug applications (sNDAs) and supplemental biologics license applications (sBLAs) that propose new uses of approved therapies to address an unmet medical need. The program is available across all therapeutic areas.

STAR Eligibility Criteria

Content current as of:

02/17/2023

Regulated Product(s)

Drugs

Law(s) & Regulation(s)

Prescription Drug User Fee Act of 1992

STAR Program Assessment



- FDA will conduct an interim assessment by the end of FY 2025
- FDA will also conduct a public workshop by the end of Q2 in FY 2026
- Outputs from the assessment and workshop will be published in a publicly available report



Challenge Question #1

When does FDA begin their review of a STAR application?

- A. Once the STAR Program Acceptance Letter is issued
- B. Upon receipt of the STAR Entry Request
- C. Upon receipt of the STAR Part 1 submission
- D. Upon receipt of the STAR Part 2 submission

Challenge Question #2

When does the PDUFA clock start for a STAR application?

- A. Once the STAR Program Acceptance Letter is issued
- B. Upon receipt of the STAR Entry Request
- C. Upon receipt of the STAR Part 1 submission
- D. Upon receipt of the STAR Part 2 submission

Challenge Question #3

When is the Integrated Summary of Safety submitted?

- A. With the STAR Entry Request
- B. With the Part 1 Submission
- C. With the Part 2 Submission
- D. 120 days after the complete supplement



Resources

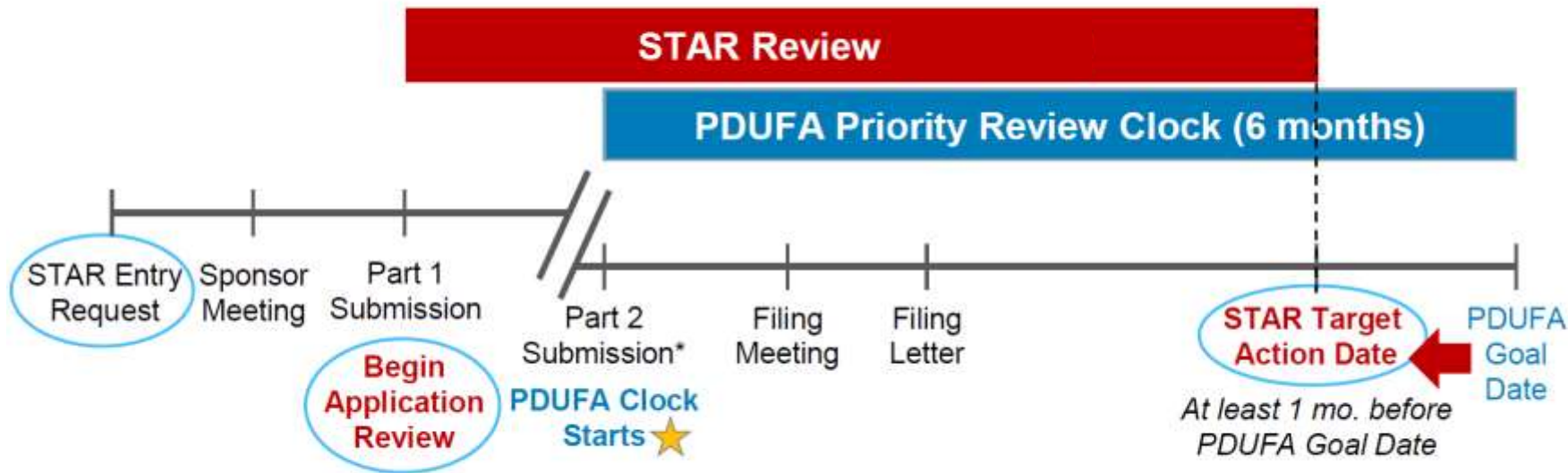
1. [PDUFA VII Commitment Letter](#)
2. [FDA STAR Website](#)

Summary

- The goal of STAR is to shorten “the time from the date of complete submission to the action date, in order to allow earlier patient access to therapies that address an unmet medical need”
- A STAR application is submitted in two parts to enable an earlier review and action
- STAR is limited to Priority Efficacy Supplements that meet certain criteria

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Questions?

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Closing Thought

Remember to include all components required for each of the 2 part submissions in order to utilize the benefits of the STAR Pilot Program.

