GLP Related Guidance Update: Pathology Peer Review and Whole Slide Imaging

Lynda Lanning, D.V.M., DABT
Senior Biologist
Division of New Drug Study Integrity
Office of Study Integrity and Surveillance
CDER | US FDA

CDER Inspections of Good Laboratory Practice, Animal Rule, and Bioavailability/Bioequivalence Study Sites – July 19, 2022

Disclaimer

The opinions and information in this presentation are those of the author, and do not necessarily represent the views and/or policies of the U.S. Food and Drug Administration.

Learning Objectives

- Define the purpose of the Pathology Peer Review in Nonclinical Toxicology Studies: Q&A Guidance for Industry
- Describe what the Pathology Peer Review Guidance covers and does not cover
- Define the purpose of the Use of Whole-Slide Imaging in Nonclinical Toxicology Studies: Q&A Guidance for Industry

Reminder

- Guidance for Industry documents are intended only to provide clarity to the public regarding existing requirements under the law.
- FDA Guidance documents should be viewed as recommendations unless specific regulatory requirements are cited.

Pathology Peer Review in Nonclinical Toxicology Studies: Q&A

- Purpose
  - Define what constitutes pathology peer review for GLP studies
  - Communicate the Agency's expectations about conducting and documenting the pathology peer review process in GLP studies
- Why?
  - Pathology Peer Review is not included in the GLP Regulations
  - Prior to this Guidance, FDA had not provided expectations to industry
  - Inconsistent Pathology Peer Review process/documentation
  - Sufficient documentation not always available
  - Lack of transparency in the process

Pathology Peer Review in Nonclinical Toxicology Studies: Q&A

- History
  - Working Group established and discussions began 9 years ago
  - Working Group included representatives from seven FDA centers and the Office of Regulatory Affairs
  - Led by CDER/OTS/OSIS

Pathology Peer Review in Nonclinical Toxicology Studies: Q&A

- Draft Guidance published for industry feedback in July 2019
  - Over 350 comments received
  - Over 25 entities submitted comments
- Working Group assessed each submitted comment during development of the final Guidance document

Pathology Peer Review in Nonclinical Toxicology Studies: Q&A

- Final Guidance published December 27, 2021

  https://www.fda.gov/media/129533/download

- Provides the FDA's expectations regarding the conduct and documentation of pathology peer review performed during GLP-compliant toxicology studies
- Issued by seven FDA centers and the Office of Regulatory Affairs
  - While testing criteria and pathology components may differ for different centers, FDA's expectations for the conduct and documentation of pathology peer review remain the same.

Pathology Peer Review – What is it… (Covered by this Guidance) (Q1)

- Guidance covers GLP compliant studies
- Process by which the diagnoses and interpretations of the pathologist assigned to a study (study pathologist) are subjected to review by one or more peer-review pathologist(s) or a Pathology Working Group (PWG).
- Helps to ensure the quality and accuracy of histopathological diagnoses and interpretations.

Pathology Peer Review– What it is not… (NOT Covered by this Guidance) (Q1)

- Casual discussions
- Opinion exchange
- Mentoring among pathologists

Key Points

- Pathology peer review can be contemporaneous or retrospective.
- Pathology peer review should be planned, conducted, documented and reported in accordance with established written procedures.
- Processes should be in place to ensure that studies are transparent and free from undue influence that could impact the conclusions of the studies, including during contemporaneous and retrospective pathology peer review.

Use of Whole-Slide Imaging in Nonclinical Toxicology Studies: Q&A

- Purpose
  - Communicate the Agency's expectations about the management, documentation and use of whole slide imaging in histopathology assessment and/or pathology peer review for GLP studies
- Why?
  - Use of whole slide images in pathology is not included in the GLP Regulations
  - Prior to this Guidance, FDA had not provided expectations to industry
  - Use of whole slide images in pathology is increasing

Use of Whole-Slide Imaging in Nonclinical Toxicology Studies: Q&A

History

- Working Group established and discussions began in September, 2020
- Working Group included representatives from seven FDA centers and the Office of Regulatory Affairs
- Led by CDER/OTS/OSIS

Pathology Peer Review in Nonclinical Toxicology Studies: Q&A

- Draft Guidance published for industry feedback on April 7, 2022
- Public comments due June 7, 2022
  - Over 80 comments received
  - 12 entities submitted comments
- Working Group will assess each submitted comment during development of the final Guidance document

Summary

- Pathology Peer Review in Nonclinical Toxicology Studies: Questions and Answers FINAL guidance was published on December 27, 2021
- Use of Whole Slide Imaging in Nonclinical Toxicology Studies: Questions and Answers DRAFT guidance was published on April 7, 2022

Challenge Question #1

Which of the following statements is true regarding information in the Pathology Peer Review in GLP studies Guidance for Industry:

A. Pathology peer review includes opinion exchange between pathologists

B. Pathology peer review helps ensure the quality and accuracy of histopathology diagnoses and interpretations

C. Pathology peer review is covered in 21 CFR part 58

D. The Guidance was issued by a single FDA center.

Challenge Question #2

Which of the following statements is NOT true regarding pathology peer review in GLP studies?

A. Pathology peer review can be contemporaneous

B. Pathology peer review can be retrospective

C. Pathology peer review does not need to be conducted in accordance with established written procedures

D. Processes should be in place to ensure that studies are transparent and free from undue influence

Resources

- Pathology Peer Review in Nonclinical Toxicology Studies: Questions and Answers, Guidance for Industry https://www.fda.gov/media/129533/download
- Use of Whole Slide Imaging in Nonclinical Toxicology Studies: Questions and Answers, Guidance for Industry, DRAFT https://www.fda.gov/regulatory-information/search-fda-guidance-documents/use-whole-slide-imaging-nonclinical-toxicology-studies-questions-and-answers

Questions?

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