Project Facilitate: An Overview of Expanded Access and the Review Process

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Regulatory Best Practices for Global Access to Medicines, Including Anti-TB Medicines – August 17, 2022

Objectives

1. Define expanded access and the key requirements for an expanded access request for an individual patient.
2. Summarize the key responsibilities of the oncology healthcare professional when considering expanded access for a patient.
3. Identify resources available to requestors considering submission of an oncology expanded access request for an individual patient.
4. Describe how Project Facilitate is a resource to navigate the Oncology Expanded Access pathway

Misconception

- Myth: Only physicians can be “sponsors” of expanded access applications
  - Industry/drug companies can be the sponsor of single patient expanded access applications on behalf of a physician


Compassionate Use
Pre-Approval Access
SPI
EIND
Treatment IND
Single Patient Investigational New Drug
Emergency IND
EA
Single Patient IND
Expanded Access

What is Expanded Access?

- Use of an investigational medical product to **treat a patient** with a serious disease or condition who does not have comparable or satisfactory alternative therapies to treat the disease or condition

- Contrast with investigational medical product in a clinical trial where the **primary intent is research**
  - systematic collection of data with the intent to analyze it to learn about the investigational medical product

Access to Treatment

Approved Drugs

- ❑ Studied and characterized
- ❑ Labeled
- ❑ Broadest availability
- ❑ Reimbursement is by 3rd party

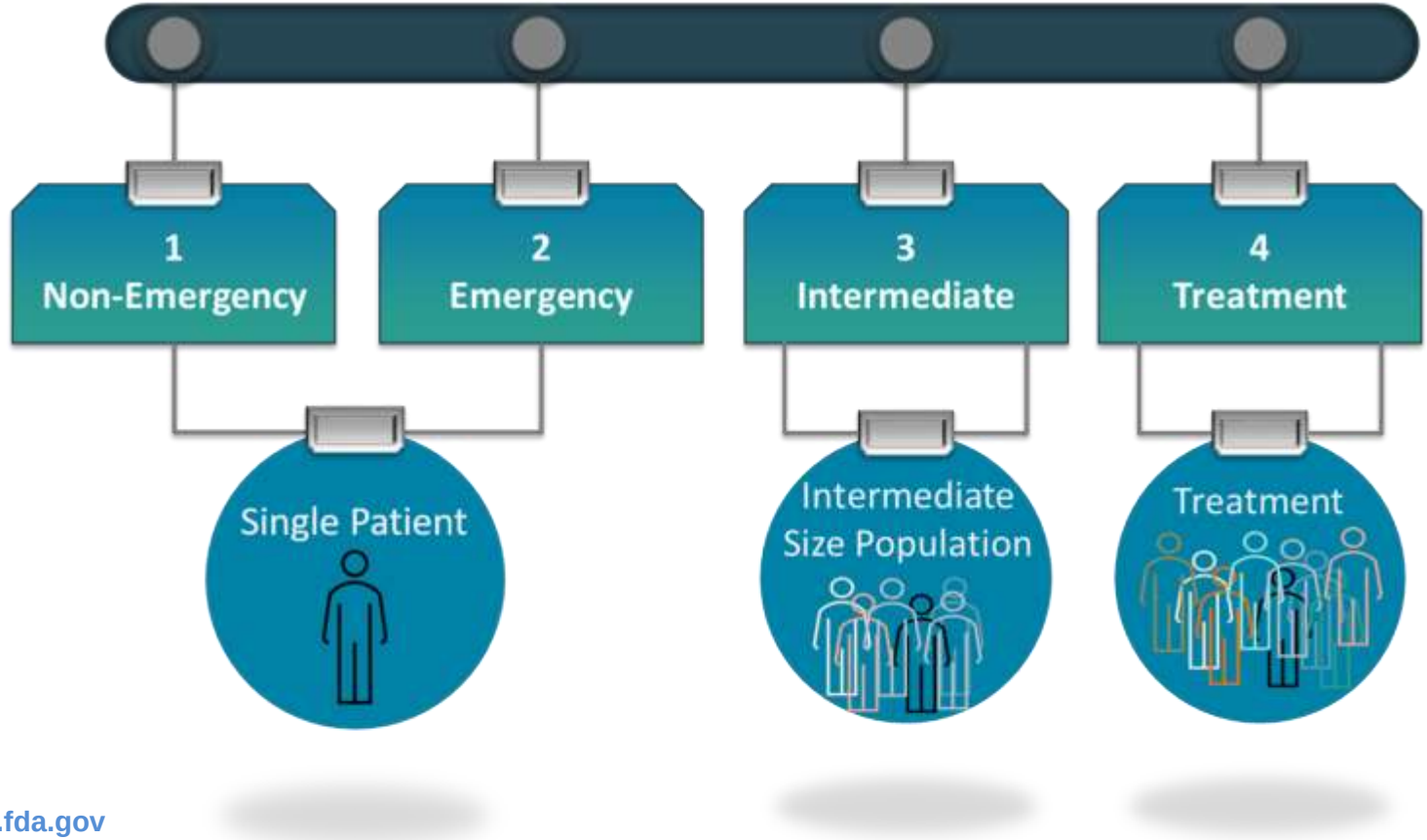
Clinical Trials

- ❑ Goal is research
- ❑ Provide necessary data to determine safety and effectiveness
- ❑ Most efficient path to market and broad availability
- ❑ https://clinicaltrial.gov

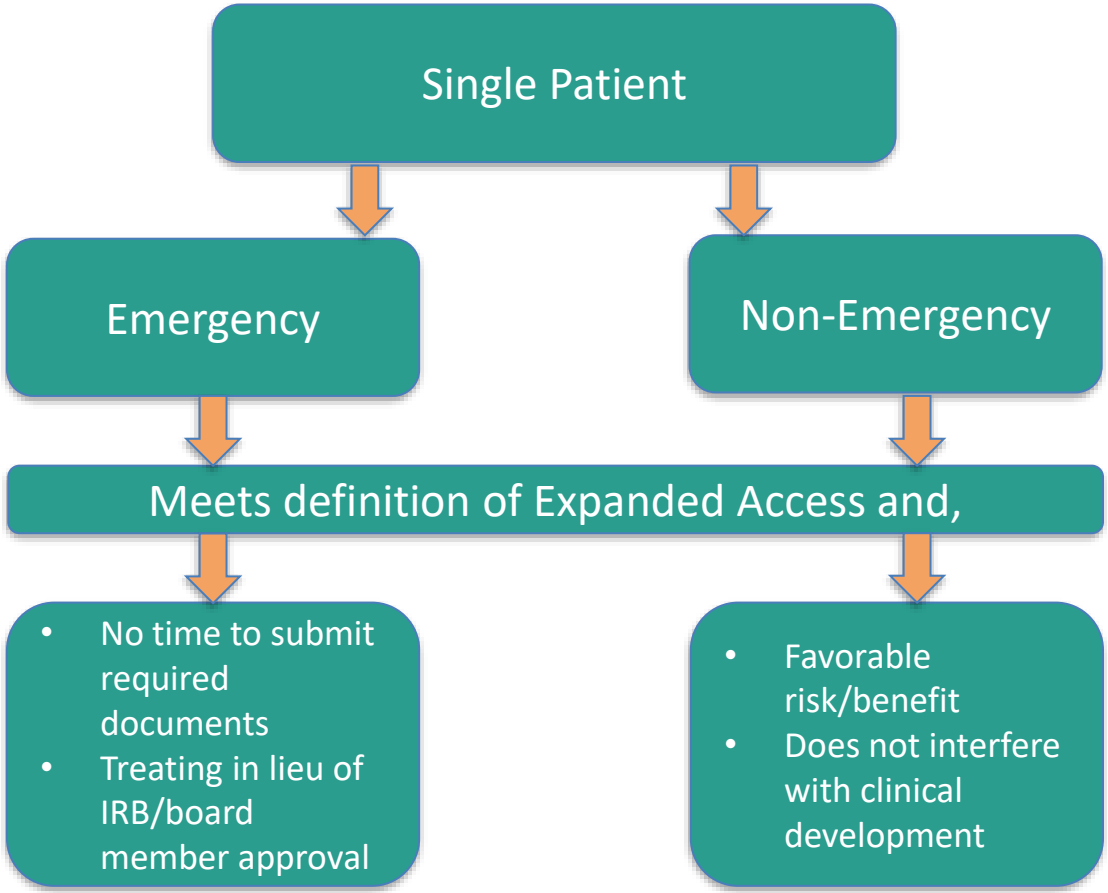
Expanded Access

- ❑ Goal is access to treatment
- ❑ Represents opportunity when other options are exhausted
- ❑ https://www.fda.gov/news-events/public-health-focus/expanded-access

Expanded Access Program



Types of Applications



Eligibility criteria

Immediate life-threatening or serious disease/ condition

Not eligible or cannot access a clinical trial

Exhausted all other treatment options

Human Subject Protection

- Apply to all expanded access requests

- Products under expanded access are investigational drugs, and are subject the following requirements:
  - Protection of human subjects (informed consent)
  - Institutional Review Boards (IRB)
    - With single patient IND requests, a chairperson or designated IRB member can authorize (no need for a full IRB convening)
  - Clinical holds based on safety
  - Reporting requirements (adverse event reports, annual reports)

Considerations

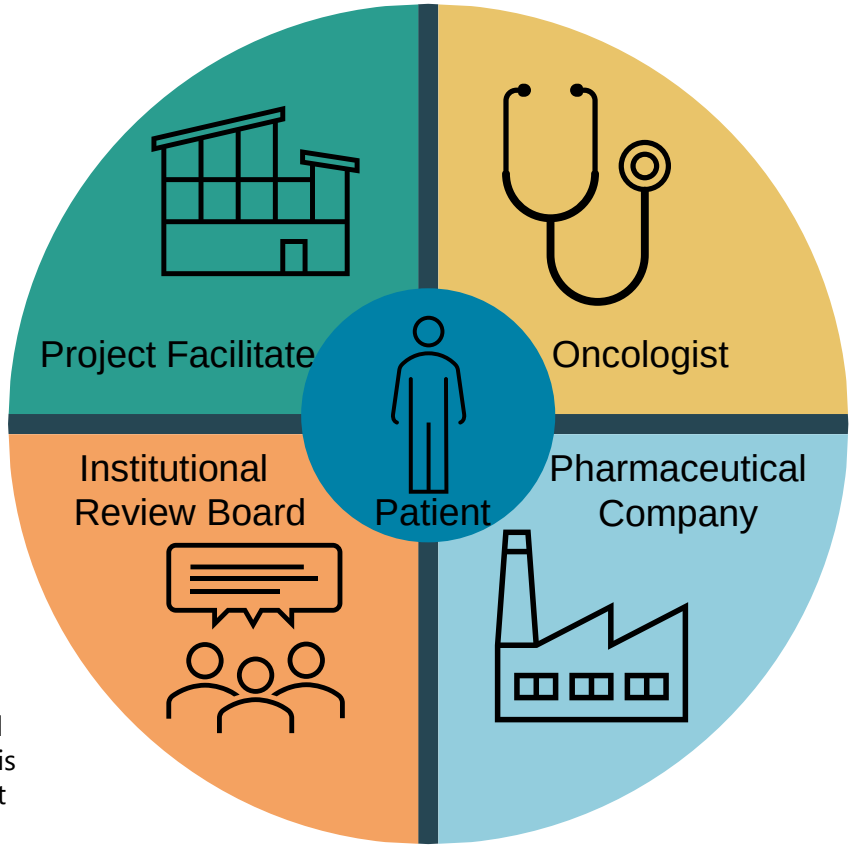
- Unknown risks and limited information associated with access to investigational products
  - Some patients may benefit
  - Some patients may experience no effect
  - Some patients may have serious adverse events

- FDA considers:
  - Potential harm to patient
  - Need to exhaust all existing approved therapies
  - Scientific likelihood of an efficacious response

Potential Benefits

- **Access** for oncology patients with serious or life-threatening diseases who have no other alternatives, and are willing to accept greater risk
- **Patient autonomy** over their health care decision
- **Bridge the gap** between the latter stages of product development and approval by making a drug widely available during that period
- **May provide data** to support development

Assists in completing the Expanded Access request, reviews the application, and determines if the treatment may proceed



Initiates request, oversees the patient's treatment, and provides annual updates to the FDA

Reviews Expanded Access protocol and informed consent to ensure the patient is informed about the nature of treatment

Determines if the product will be provided under Expanded Access and issues a Letter of Authorization to the treating physician

Physician/Sponsor Responsibilities

- Agrees to oversee the patient's treatment
- Works with industry (e.g., medical product developer)
- Files paperwork with FDA and IRB
- Responsible for patient care and reporting

"The mission of Project Facilitate is to promote equitable access to investigational products for patients with cancer by providing comprehensive support to oncology healthcare professionals in completing expanded access requests."

Addressing Barriers

Unknowns

- Number of patients requesting Expanded Access
- Reasons for industry denials
- Patient outcomes: benefits, adverse events

Knowns

- Potential unequal access
- Perception of burdensome process
- Not enough resources

Addressing Barriers

Unknowns

- Collecting metrics on applications
- Recording reasons why applications are denied
- Long-term surveillance

Knowns

- Public outreach
- Personalized presentations/walkthroughs
- Reducing regulatory burden

Two-Pronged Approach to Oncology

Patient awareness and information on specific programs

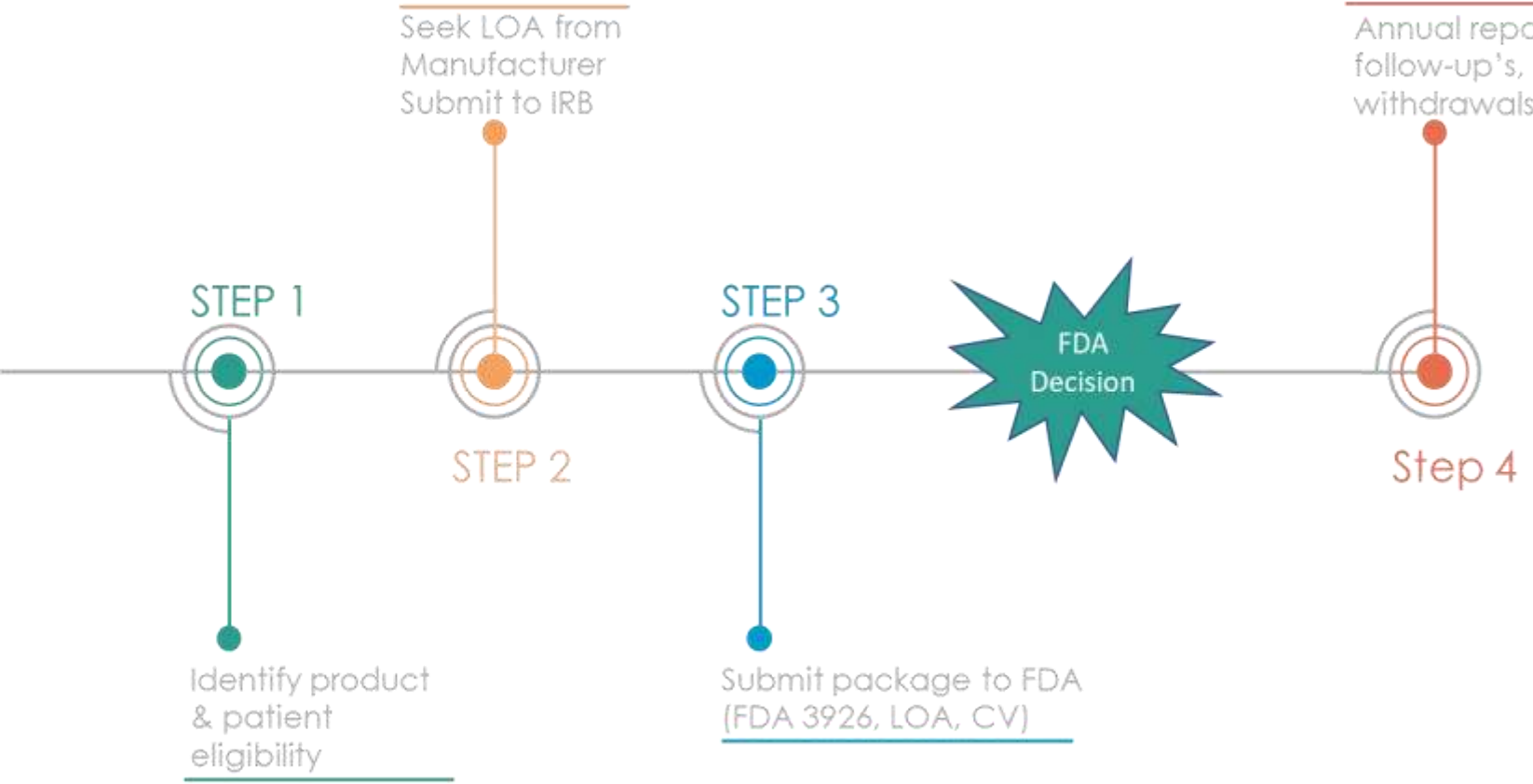
- *Reagan-Udall Expanded Access Navigator* website provides information on sponsors' policies and listings on ClinicalTrials.gov

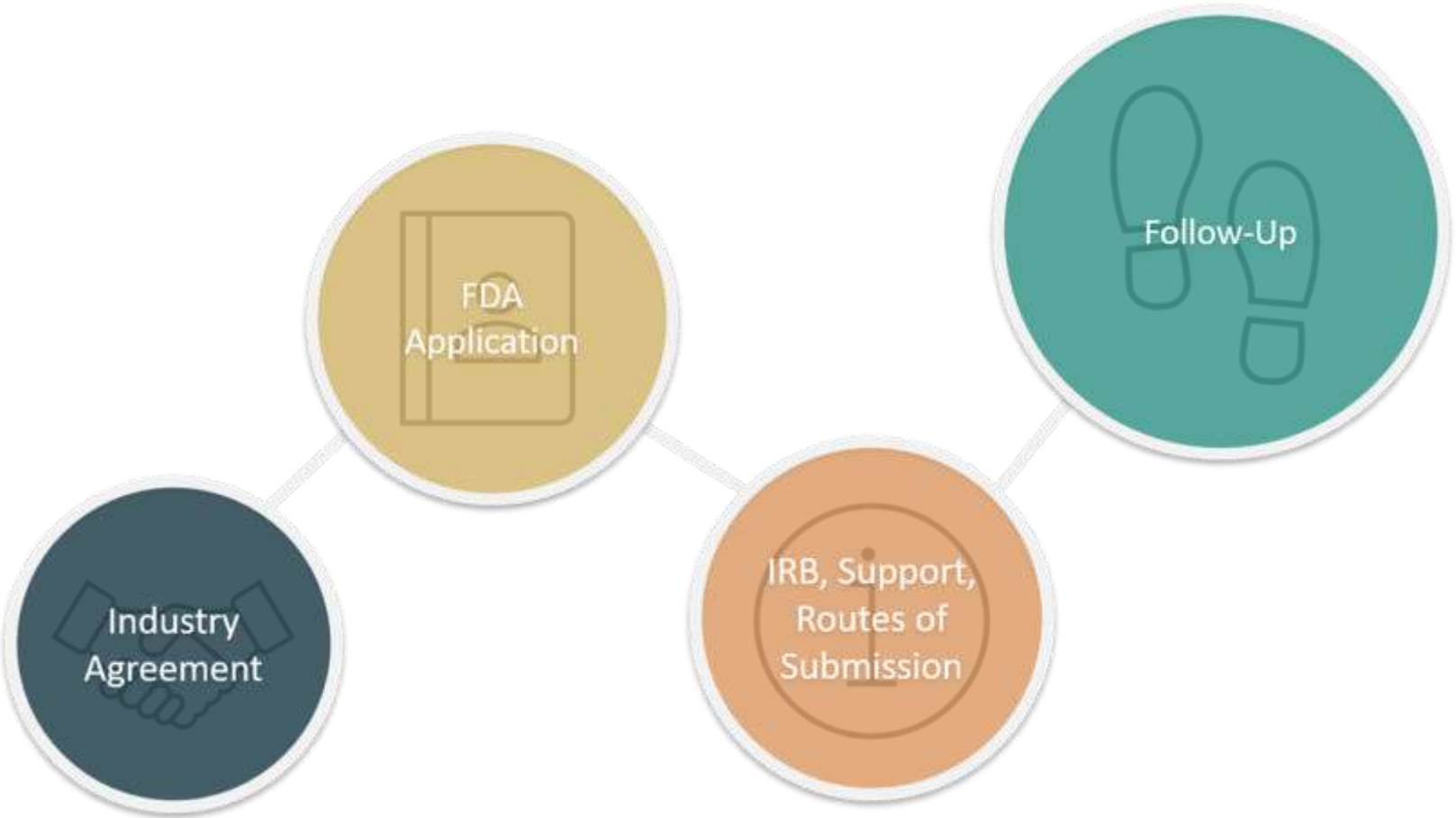
Oncology healthcare provider access

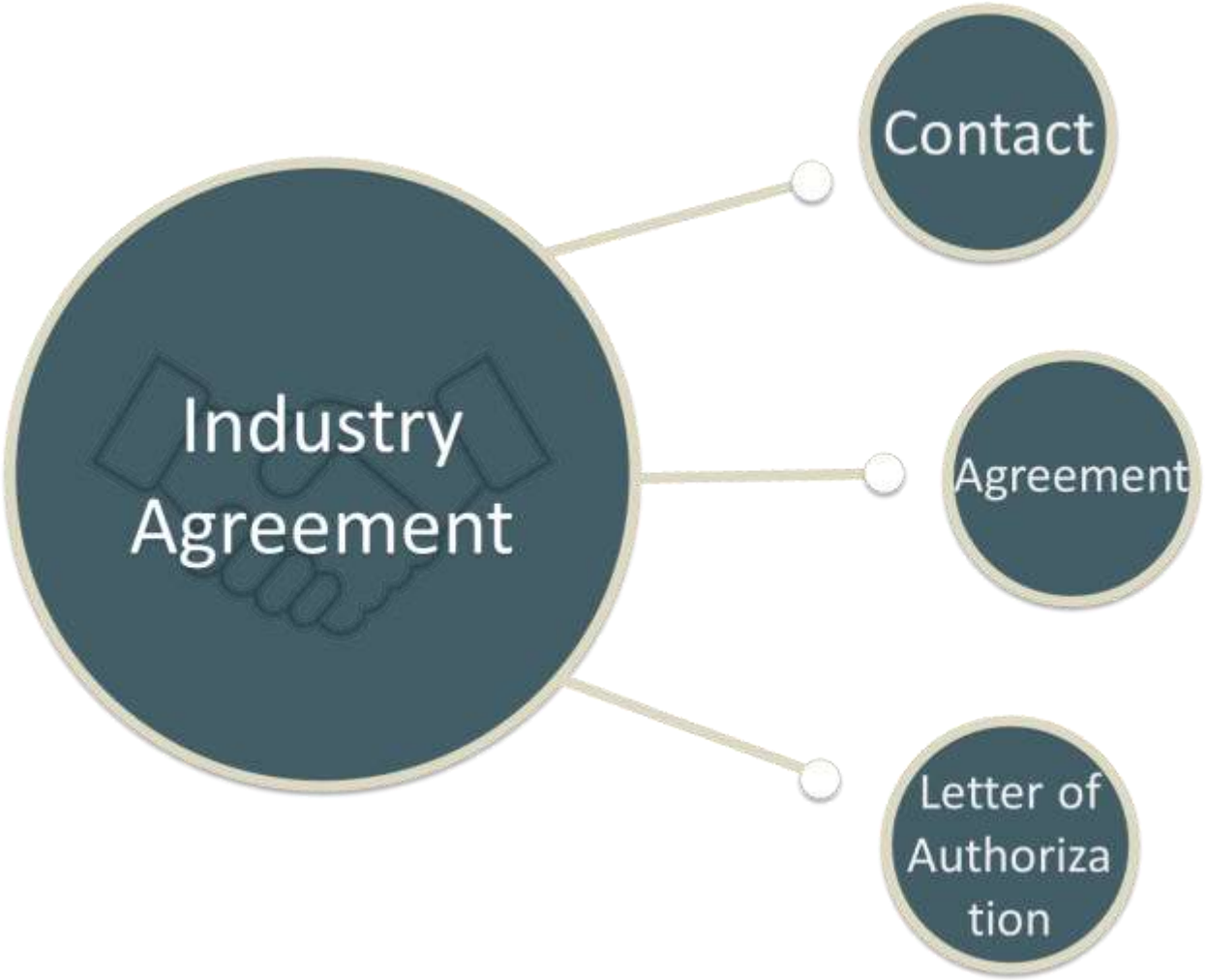
- *Oncology Center of Excellence Project Facilitate* program to provide continuous support to healthcare professionals and their teams throughout the EA process

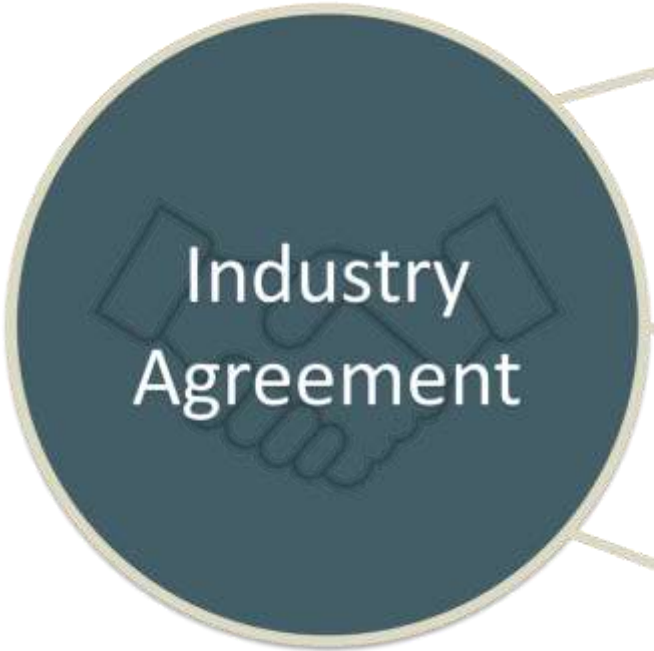
Benefits of Project Facilitate

- One point of contact for all oncology single patient and emergency requests
- Dedicated clinical staff available during business hours to support requestors via phone or email
- Additional support options to provide:
  - IRB options
  - EA contact for drug/biotech company
  - Assistance filling out Form FDA 3926, if needed
- Efficiency in processing
- Collection of metrics
- Annual report reminders/Follow up


Seek LOA from Manufacturer Submit to IRB
Annual reports, follow-up's, withdrawals
STEP 1
STEP 3
FDA Decision
STEP 2
Step 4
Identify product & patient eligibility
Submit package to FDA (FDA 3926, LOA, CV)


Industry Agreement
FDA Application
IRB, Support, Routes of Submission
Follow-Up


Industry Agreement
Contact
Agreement
Letter of Authorization



Contact

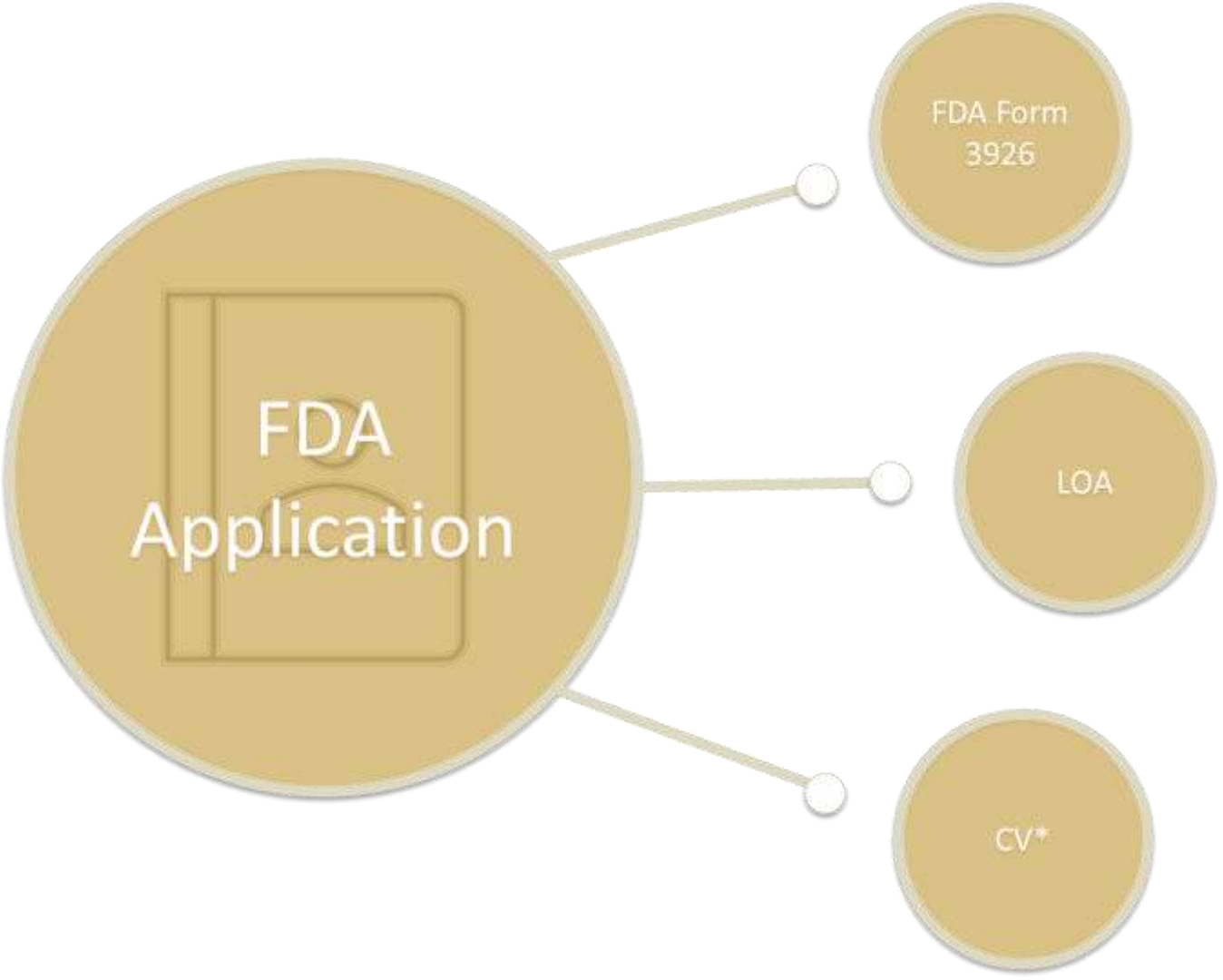
- Reagan Udall Foundation
- Company Directory

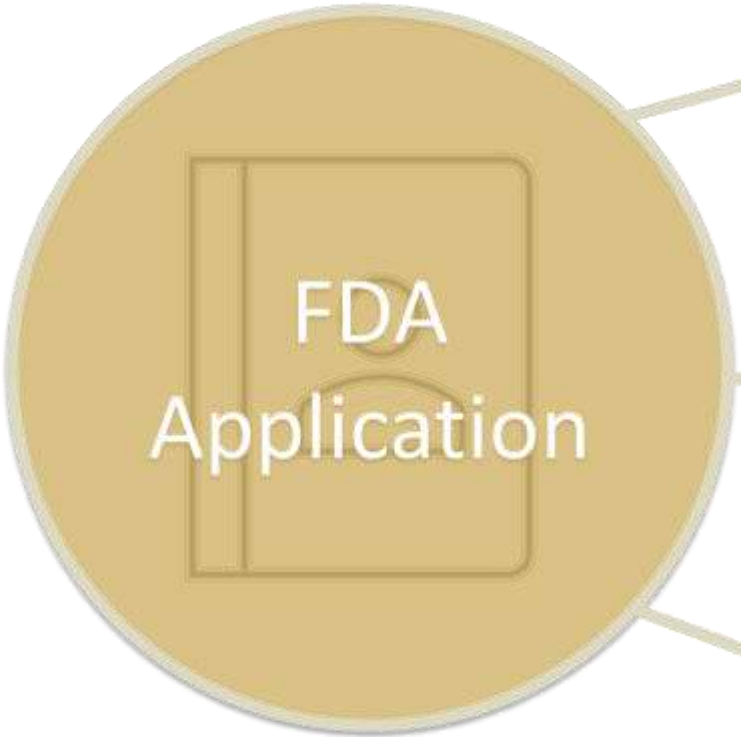
Agreement

- Contracts
- Letter of Agreement

Letter of Authorization

- Letter of Cross-Reference
- Specific to your patient


FDA Form 3926
FDA Application
LOA
CV*

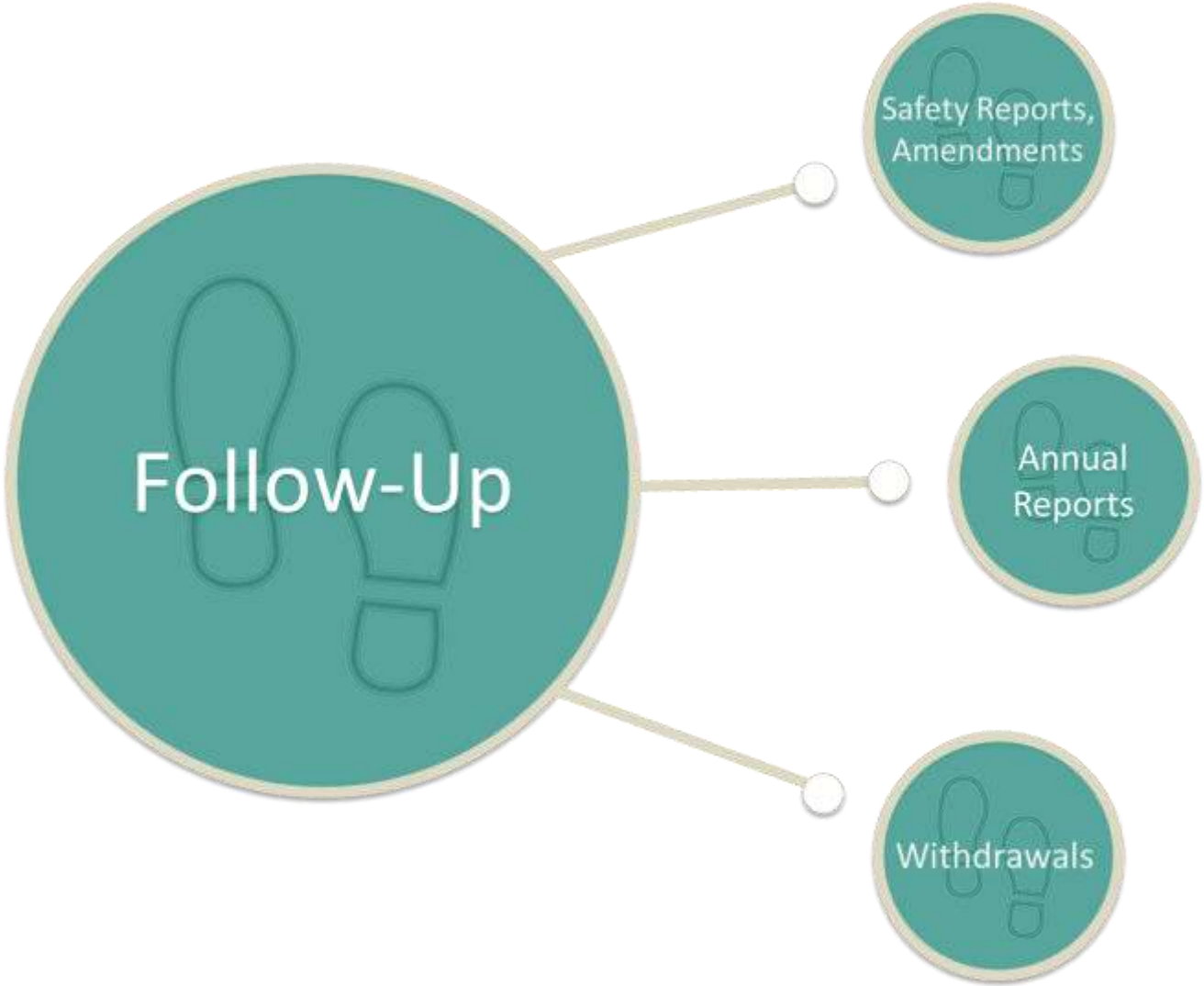


- Patient's medical and therapy history
- Treatment, monitoring and dose-modification plan
- Signed by treating physician

- Letter of Authorization

- CV or Resume of treating physician
- Can be abbreviated
- *can fill in Section 7 of the 3926

7. Physician's Qualification Statement *(Including medical school attended, year of graduation, medical specialty, state medical license number, current employment, and job title. Alternatively, attach the first few pages of physician's curriculum vitae (CV), provided they contain this information. If attaching the CV electronically, use normal PDF functions for file attachments.)*


Follow-Up
Safety Reports, Amendments
Annual Reports
Withdrawals

- Safety Initial and Follow-Up Reporting
  - 15-day report
  - 7-day report
  - Follow-up IND Safety Report

- Due every anniversary
- Summary information
- Suspected adverse events due to the inv. product

- Patient no longer on investigational product

Submit follow-ups digitally or by paper. PF does not accept emailed follow-ups except for emailed safety reports

Emergency

- ❑ FDA Form 3926
- ❑ LOA
- ❑ CV

Verbal
OR
Granted Letter

- ❑ IRB review within 5 business days of treating patient
- ❑ Submit your full application package within 15 business days of granted

Non-Emergency

- ☑ FDA Form 3926
- ☑ LOA
- ☑ CV

30 Days
OR
Granted Letter
+
IRB Approval

Industry as a Sponsor

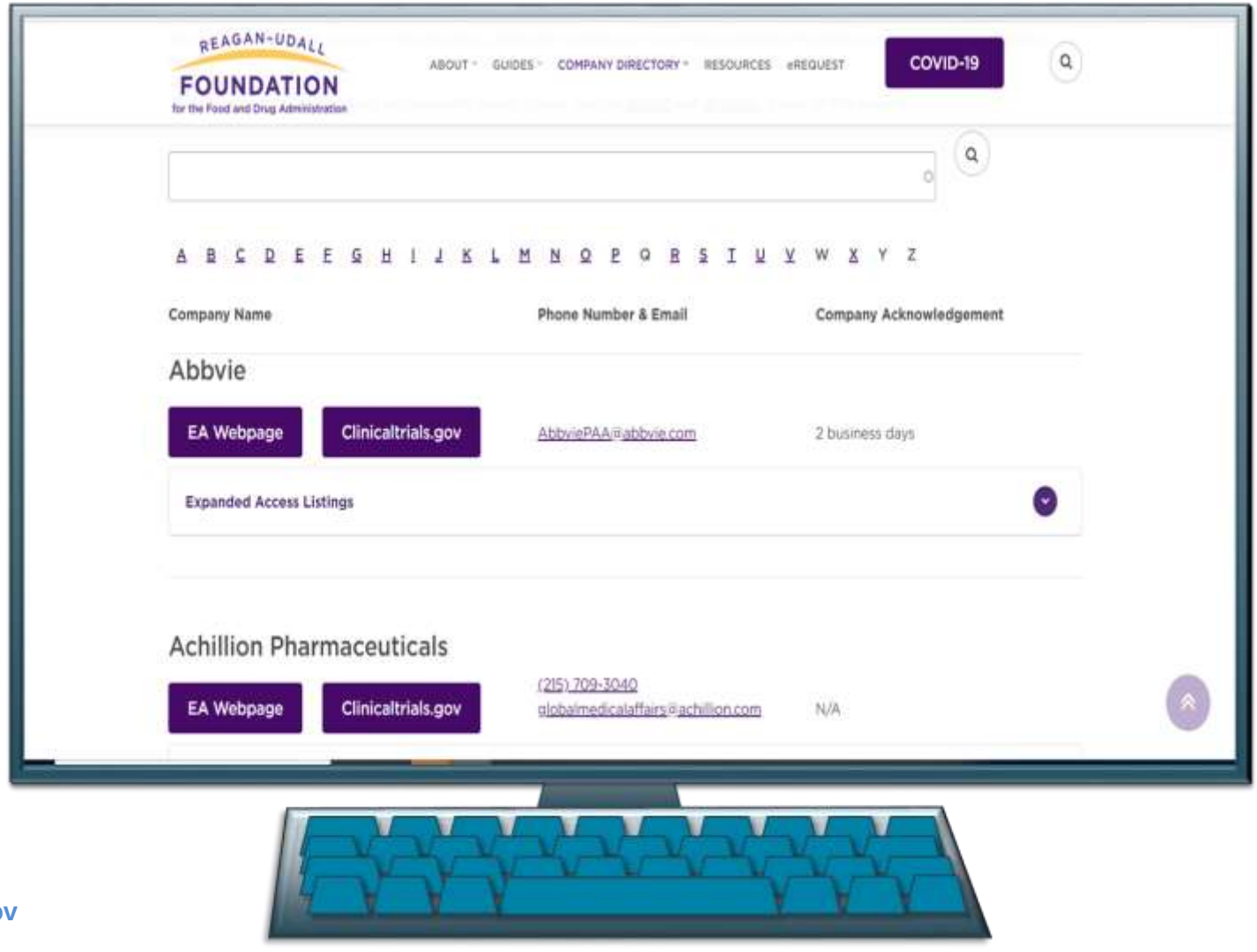
- Physician's CV/information
- Industry responsible for reporting
  - Safety reports
  - Annual reports
  - Protocol Amendments
  - Withdrawals

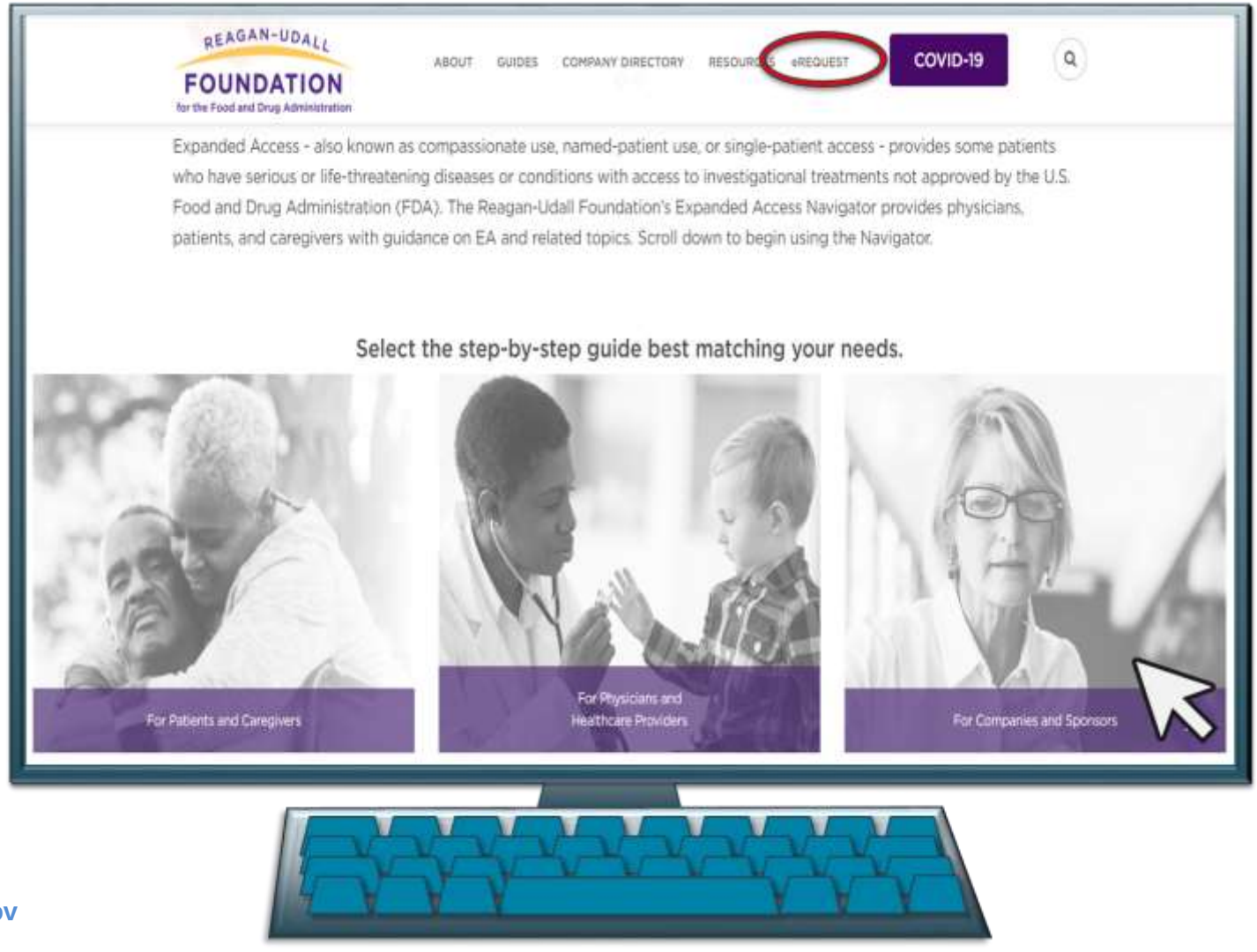
Reagan-Udall Foundation: Expanded Access Navigator

Created by the Reagan-Udall Foundation for the FDA, the EA Navigator:

- Provides clear, factual information in an online platform
- Takes users step-by-step through the process of expanded access requests
- Serves as a roadmap for single-patient expanded access requests that inform patients, physicians and companies exploring EA


EXPANDED ACCESS
NAVIGATOR
Expanded Access (EA) may be considered for patients who have exhausted their treatment options and are not eligible for, or able to participate in, a clinical trial.
EA - also known as compassionate use, named-patient use, or single-patient access - provides some patients who have serious or life-threatening diseases or conditions with access to investigational treatments not approved by the U.S. Food and Drug Administration (FDA). The Reagan-Udall Foundation's Expanded Access Navigator provides physicians, patients, and caregivers with guidance on EA and related topics. Scroll down to begin using the Navigator.
• Features portals for providers, patients/caregivers and companies
• Explains role of FDA in expanded access and importance of reporting requirements
• Connects providers, patients and caregivers to investigational therapies
• Supplements Project Facilitate
• Allows companies to demonstrate compliance with laws mandating public expanded access policies
• Promotes greater patient equity


REAGAN-UDALL FOUNDATION
for the Food and Drug Administration
ABOUT
GUIDES
COMPANY DIRECTORY
RESOURCES
eREQUEST
COVID-19
A B C D E F G H I J K L M N O P Q R S T U V W X Y Z
Company Name
Phone Number & Email
Company Acknowledgement
Abbvie
EA Webpage
Clinicaltrials.gov
AbbviePAA@abbvie.com
2 business days
Expanded Access Listings
Achillion Pharmaceuticals
EA Webpage
Clinicaltrials.gov
(215) 709-3040
globalmedicalaffairs@achillion.com
N/A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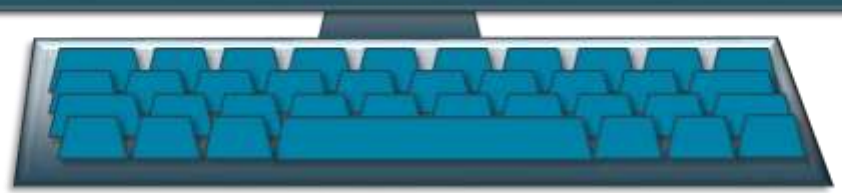
Select the step-by-step guide best matching your needs.
For Patients and Caregivers
For Physicians and Healthcare Providers
For Companies and Sponsors


REAGAN-UDALL
FOUNDATION
FOR THE FDA
Get Started
Submit Application
Contact Us
Resources
Sign In
Expanded Access eRequest
Physicians: Electronically request non-emergency use of medical products for your patients
Get Started
Not a Physician? View Information for Patients and Caregivers
Terms
Privacy Policy

Expanded Access Resources

- Patients and Non-Oncology Healthcare Professionals
  - Reagan Udall Foundation
    - Website: https://reaganudall.org/
  - FDA Division of Drug Information (DDI)
    - Website: https://www.fda.gov/news-events/expanded-access/fdas-expanded-access-contact-information
    - (855) 543-DRUG or druginfo@fda.hhs.gov
- Oncology Healthcare Professionals
  - Project Facilitate
    - Website: https://www.fda.gov/about-fda/oncology-center-excellence/project-facilitate
    - (240) 402-0004 or ONCProjectFacilitate@fda.hhs.gov
  - Reagan Udall Foundation
    - EA Navigator: https://navigator.reaganudall.org/expanded-access-navigator

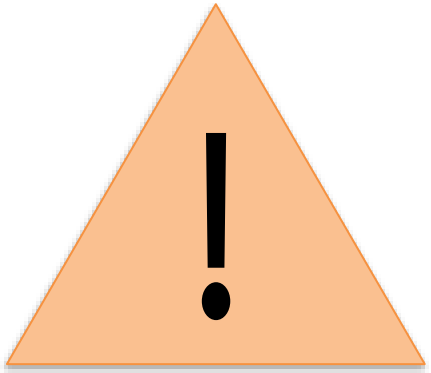


Clinical Review

- Safety
  - Risk vs Benefit
- Effectiveness
  - Established scientific evidence
- Alternate options
  - Established therapies
  - Clinical trials

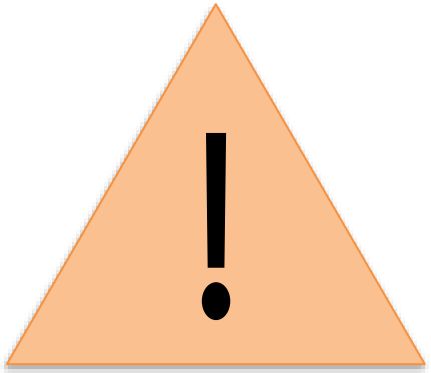
Safety

- Risk vs Benefit
- Treatment Plan
  - Monitoring Plan
  - Dose Modification Plan



Safety

- Clinical trial data
  - Age
  - Indication
- Dose limited toxicities (DLT)
- Common adverse events (AE)
- Class-wide AEs

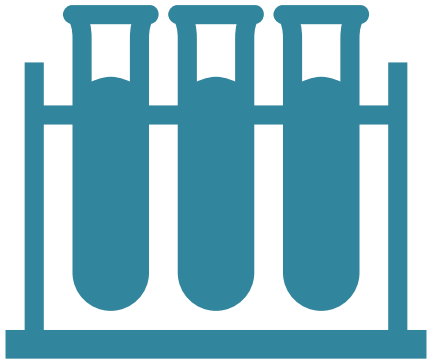


Efficacy

- Clinical trial data
  - Indication
  - Biomarkers and mutations
- Intermediate endpoints
- Other expanded access data

Chemistry and Manufacturing

- FDA CMC Reviewer
- Certificate of Analyses
  - Assures identity, purity and potency
- Lot/batch information
- Expiration dates
- Other CMC data: DS/DP



Successful Application

- **Letter of Authorization**
- Rationale
  - Failed established treatment options
  - Scientific evidence
    - Indication
    - Age
    - Duration
- Responsive to FDA information requests

Useful Resources

- FDA Project Facilitate Website: https://www.fda.gov/about-fda/oncology-center-excellence/project-facilitate
- FDA Expanded Access Site: https://www.fda.gov/news-events/public-health-focus/expanded-access
- Reagan-Udall Foundation EA navigator: https://navigator.reaganudall.org/expanded-access-navigator
- eRequest: https://erequest.navigator.reaganudall.org
- Form 3926: https://www.fda.gov/media/98616/download
- Instructions for 3926: https://www.fda.gov/media/98627/download
- FDA Drug Info Rounds Expanded Access Video Series: https://www.fda.gov/drugs/information-healthcare-professionals-drugs/fda-drug-info-rounds-expanded-access-video-series

After Hours Emergency Requests: Contact FDA's emergency call center at (866) 300-4374

U.S. FOOD & DRUG ADMINISTRATION

Questions?

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