A Deep Dive: GDUFA III Scientific Meetings Introduction

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SBIA Webinar: A Deep Dive: GDUFA III Scientific Meetings

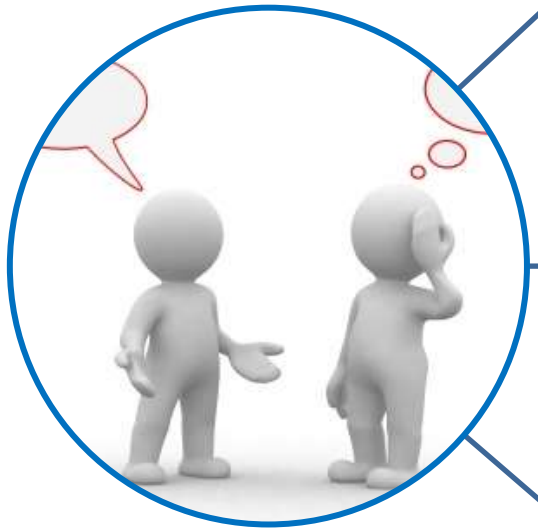
Webinar Objectives

- Provide an in-depth look into the enhancements and new features of GDUFA III scientific meetings
  - Pre-submission meetings
  - Post-complete response letter (CRL) scientific meetings
  - Product-specific guidance (PSG) teleconferences and PSG meetings
- Describe how and when to utilize these meetings to support generic drug development
- Provide clarification and best practices in meeting request and conduct

Agenda

• **Introduction**	Lei Zhang
• ***Redesigned*** **Pre-Submission Meetings**	Karen Bengtson
• ***New*** **Post-CRL Scientific Meetings**	Tao Bai
• ***New*** **PSG Teleconferences**	Caliope Sarago
• ***New*** **PSG Meetings**	Hee Sun Chung
• **Audience Q & A and Panel Discussion**	
– Speakers	
– David Coppersmith	
– Pinaki Desai	
– John Ibrahim	
– Rob Lionberger	
– Partha Roy	
• **Closing Remarks**	Rob Lionberger

Communication to Industry: Prior to GDUFA III



Guidances
- General guidances
- Product-specific guidances

Written Communication
- Controlled Correspondence
- General Correspondence

Industry Meetings
- **Product development**
- **Pre-submission**
- **Mid-review cycle meeting (new name: mid-cycle review meeting)**
- Post-CRL teleconference

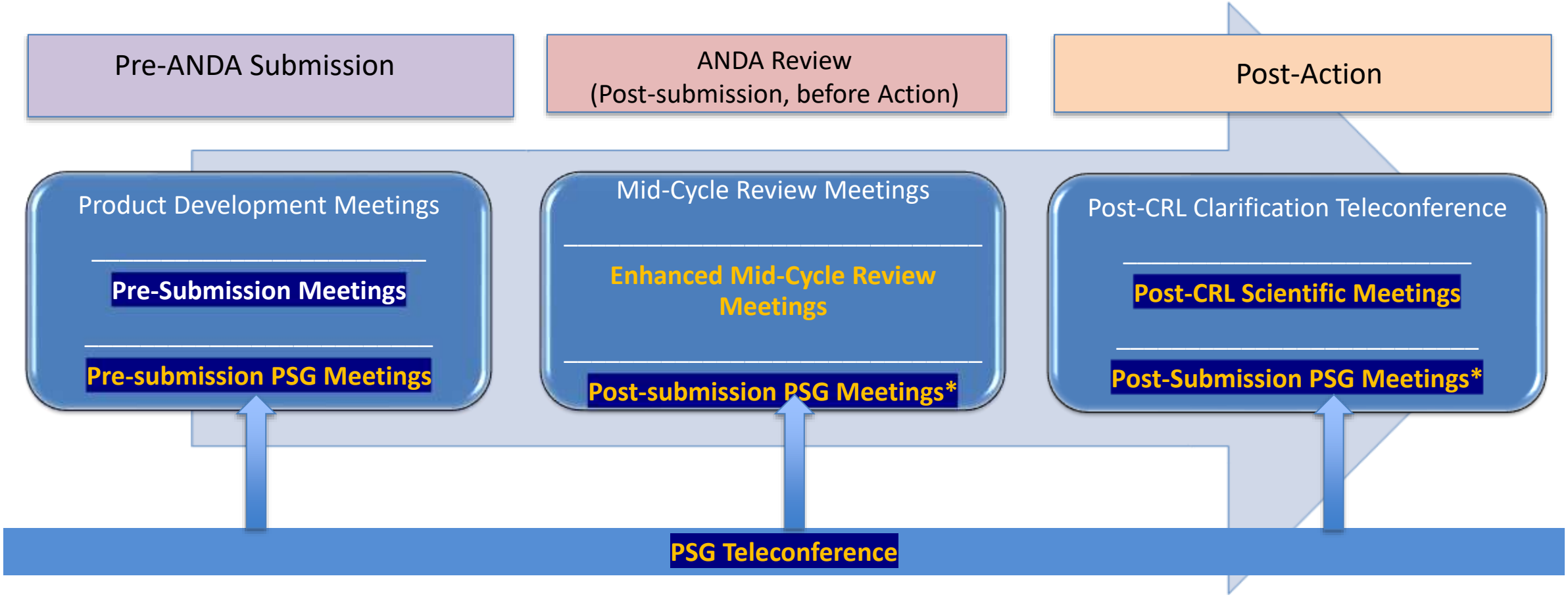
Started in GDUFA II (Oct 2017-Sept 2022): ***Pre-ANDA meetings*** to assist prospective ANDA applicants of complex products before the submission of an ANDA to FDA.

CRL: complete response letter; GDUFA: Generic Drug User Fee Amendments

GDUFA III Meetings

- On September 30, 2022, the Generic Drug User Fee Amendments (GDUFA) were reauthorized with provisions that are in effect from October 1, 2022, through September 30, 2027 (GDUFA III)
- The GDUFA III commitment letter contains a number of enhancements or changes to the existing generic drug program's pre-ANDA and ANDA process as it relates to scientific meetings that help provide clarity to current and prospective applicants looking to develop new generic drug products

GDUFA III Meetings



CR: complete response; TA: tentative approval;
AP: approval; RTR: refuse to receive

*Depend on the ANDA status, i.e., whether ANDA is under review, post-CRL or TA Action: CR, TA or AP, (during filing, RTR)

Goals of GDUFA III Scientific Meetings

- Clarify regulatory expectations for prospective applicants early in product development
- Assist applicants in developing more complete, quality submissions
- Promote a more efficient and effective ANDA assessment process
- Provide targeted, robust advice as applicants work to meet the standard for ANDA approval
- Reduce the number of assessment cycles required to obtain ANDA approval

GDUFA III Teleconferences and Meetings

- **Teleconference:** Defined by the commitment letter as a verbal communication by telephone
- **Meeting:** Has a "face-to-face interaction" which may be held in the following ways: videoconference and in person face-to-face (when the core staff participate in person at the FDA)

As a meeting type:
Teleconference ≠ Meeting

- **Note: Teleconference** is a "meeting type" as well as a "meeting format"

GDUFA III Teleconferences and Meetings

The GDUFA III meetings that will be covered by today's webinar are highlighted

Clarification

Teleconference

- MCRM*
- Post-CRL Clarification Teleconference
- PSG Teleconference

Scientific Discussion

Meeting

- Product development
- Pre-submission
- EMCRM
- Post-CRL Scientific
- Pre-submission PSG
- Post-submission PSG

MCRM: mid-cycle review meetings; EMCRM: enhanced MCRM; Post-CRL: post-complete response letter
*Meeting which is treated as a teleconference (T-con)

Meeting Formats Under GDUFA III

Meetings

- **In Person Face-to-face meetings** (FTF) are those in which core staff participate in person at the FDA
  - Additional attendees can participate virtually via a video connection, as needed (e.g., a **hybrid** meeting format)
- **Videoconferences** (VC) are meetings in which the attendees participate from various remote locations via a video connection

Teleconference

- **Teleconference** (TC) means a verbal communication by telephone
- **Written response only** (WRO) responses are sent in lieu of a meeting or teleconference when requested by or otherwise agreed to by the applicant

Guidance for Industry: The Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA (Oct 2022)

Videoconference (VC) ≠ Teleconference (TC)

- FDA uses the same platform (e.g., Zoom) to conduct TC and VC, but they are not the same
  - VCs allow for both audio and visual communication which not only facilitate discussion but also can serve as an alternate to in person face-to-face meetings
  - TCs are voice only with no projection of presentation materials or use of video/camera
- For scientific meetings, like pre-ANDA meetings, VC is typically more effective than TC considering the complexity of the scientific nature of the discussion
- Teleconferences are more appropriate for clarification questions
  - Specific meeting types are strictly TC (e.g., PSG teleconferences, post-CRL clarification)
- Applicants should request the desired meeting format in the meeting request
  - **e.g., DO NOT request a TC if you want a VC!**
- FDA will confirm the meeting format at the time of granting the meeting

FDA Resumed In-Person FTF Meetings for ANDA Applicants

- Beginning March 27, 2023, applicants can request in-person FTF meetings for PDEV or PSUB meetings
- A phased-in approach: starting the in-person FTF meeting option with two **Pre-ANDA meetings**, if specifically requested by the applicant and meeting the criteria for granting
  - Product Development (PDEV) Meetings
  - Pre-Submission (PSUB) Meetings

Update on In-Person Face-to-Face ANDA Meetings | FDA

FDA Resumed In-Person FTF Meetings for ANDA Applicants

- In-person FTF meeting requests may be limited by facility capacity and logistical considerations
  - Video-conference will be the default option
- Requests for an in-person FTF meeting must be part of the initial meeting request package received
- In-person FTF meeting requests for other meeting types, if granted, will be held fully virtually (i.e., the in-person format will not be considered)
- Existing meetings received or scheduled before March 27, 2023 will not be converted to the in-person format

How are In-Person FTF Meetings Conducted?

- All in-person FTF meetings would be an In-person and Videoconference Hybrid
- In-person FTF meetings will be held with just the “core” participants from FDA with industry participants
- From FDA, it is likely to be
  - Project Manager(s)
  - Meeting Chair
  - SMEs with an anticipated primary speaking role
- All other participants will be remote via video and audio

Challenge Question

Starting March 27, 2023, what kind of meetings can an ANDA applicant request as an in-person meeting?

A. Product Development Meetings

B. Pre-Submission Meetings

C. Post-CRL Scientific Meetings

D. A and B

E. All of the above

Communication to Industry: GDUFA III

Guidances

- General guidances
- **Timely development and transparency on PSGs for all products**

Written Communication

- **Controlled Correspondence to provide input throughout product life cycle**

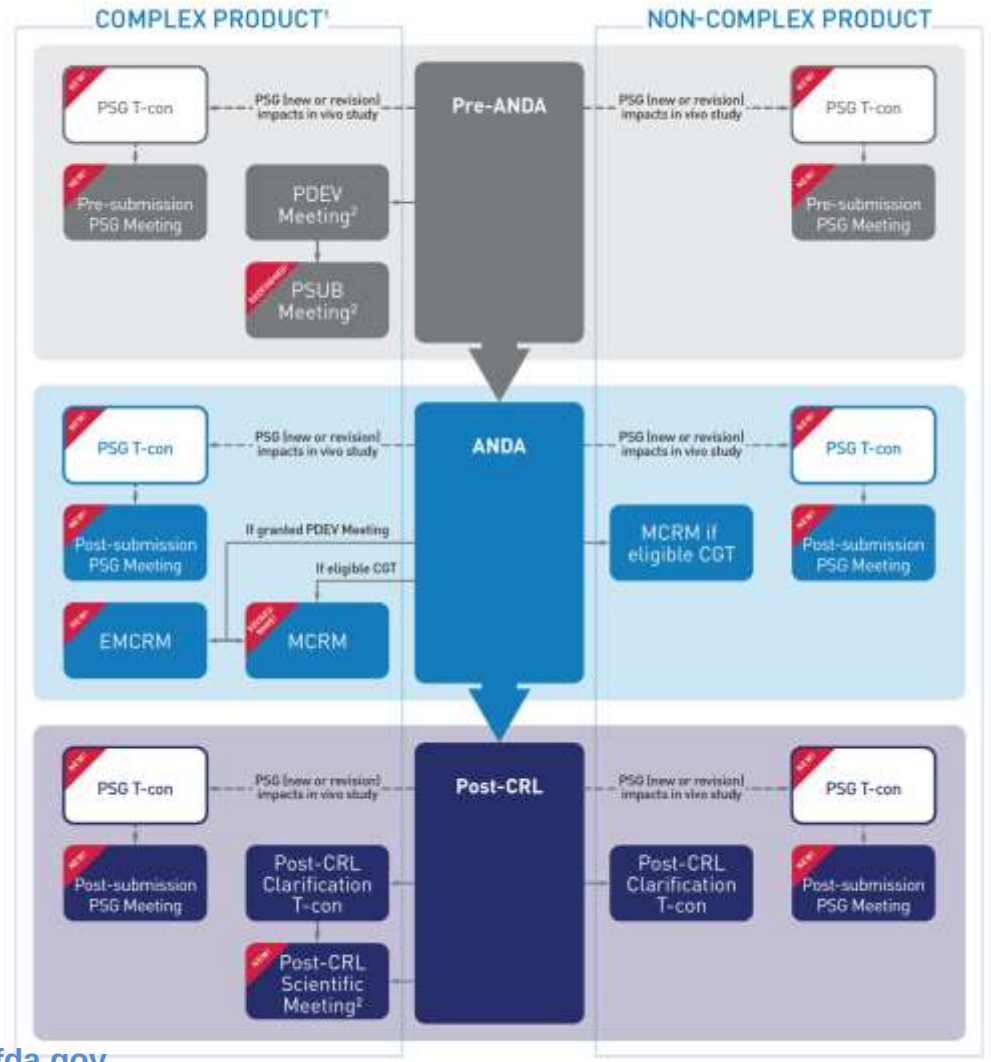
Industry Meetings

- **More meetings under GDFUA III to provide input throughout product life cycle**
  - More meetings in different situations
  - More transparency
  - More efficient development and decisions about complex generics

GDUFA III T-Con and Meeting Infographic

GDUFA III Commitment Letter | Summary of T-cons & Meetings

Changes with GDUFA III on and after October 1, 2022. This infographic shows a high-level overview of various T-cons and meetings including new and redesigned ones based on ANDA stage and drug product complexity.



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Pre-ANDA

	"Pre-submission" PSG T-Con (NEW!)	Pre-submission PSG Meeting (NEW!)	PDEV Meeting	PSUB Meeting (REVISED NAME!)
Eligible Products	Complex and non-complex if PSG (new or revision) impacts in vivo BE study	Complex and non-complex if PSG (new or revision) impacts in vivo BE study	Complex[1]	Complex with PDEV meeting[2]
When to Request a Meeting	When a new or revised PSG is published and a prospective applicant has already commenced an in vivo BE study (i.e., the study protocol has been signed by the study sponsor and/or CRO)	Following PSG T-con, meeting can be requested to discuss scientific rationale for an approach other than the approach recommended in the PSG	No PSG, or new alternative BE method different from PSG recommendation	To present unique or novel data or information that will be included in the ANDA submission
Format of the Meeting	T-Con[3]	In Person FTF[4] or VC[4]	In Person FTF[4] or VC[4]	In Person FTF[4] or VC
Grant/Deny Decision Timeline	14 days	14 days	14 days	30 days
Days to Conduct the Meeting	30 days from meeting request receipt	120 days from meeting request receipt	120 days from meeting being granted	90 days from meeting request receipt
When to Send CC[5] in Lieu of a Meeting Request	When a CC could adequately address the prospective applicant's questions or when the prospective applicant's clarification or scientific questions are outside of the scope of the meeting type. In addition, applicants can send CC after meetings if they are seeking further clarification or have new questions.			

ANDA

	"Post-submission" PSG T-Con (NEW!)	Post-submission PSG Meeting (NEW!)	MCRM (REVISED NAME!)	EMCRM (NEW!)
Eligible Products	Complex and non-complex if PSG (new or revision) impacts in vivo BE study	Complex and non-complex if PSG (new or revision) impacts in vivo BE study	Complex with PDEV meeting; CGTs	Complex with PDEV meeting
When to Request a Meeting	When a new or revised PSG is published and an applicant has already commenced an in vivo BE study (i.e., the study protocol has been signed by the study sponsor and/or CRO)	Following PSG T-con, meeting can be requested to discuss scientific rationale for an approach other than the approach recommended in the PSG	Applicant has questions about the rationale for any deficiency identified in the mid-cycle DRL(s), and/or clarification questions related to FDA's assessment of the data or information in the ANDA[6]	Applicant has questions related to a proposed scientific path to address possible deficiencies identified in the mid-cycle DRL(s), and/or questions about potential new data or information to address any possible deficiencies identified in the mid-cycle DRL(s)[6]
Format of the Meeting	T-con[3]	In Person FTF[4] or VC[4]	T-con[3]	In Person FTF[4] or VC[4]
Grant/Deny Decision Timeline	14 days	14 days	14 days	14 days
Days to Conduct the Meeting	30 days from meeting request receipt	90 days from meeting request receipt	28 days from meeting request receipt	90 days from last mid-cycle DRL issuance
When to send CC[5] After Meeting	If the applicant seeks further feedback from FDA following the PSUB T-con	Not Applicable	Not Applicable	Not Applicable

Post-CRL

	"Post-submission" PSG T-Con (NEW!)	Post-submission PSG Meeting (NEW!)	Post-CRL Clarification T-Con	Post-CRL Scientific Meeting (NEW!)
Eligible Products	Complex and non-complex if PSG (new or revision) impacts in vivo BE study	Complex and non-complex if PSG (new or revision) impacts in vivo BE study	Complex and non-complex	Complex[7]
When to Request a Meeting	When a new or revised PSG is published and an applicant has already commenced an in vivo BE study (i.e., the study protocol has been signed by the study sponsor and/or CRO)	Following PSG T-con, meeting can be requested to discuss scientific rationale for an approach other than the approach recommended in the PSG	Within 10 days of CRL issuance to get 30-day goal date, to seek clarification concerning deficiencies identified in a CRL	Seek FDA's scientific advice on possible approaches to address deficiencies identified in a CRL related to establishing equivalence (must discuss at least one of the 5 topics outlined in section IV.C.1.a of the GDUFA III Commitment Letter)
Format of the Meeting	T-con[3]	In Person FTF[4] or VC[4]	T-con[3]	In Person FTF[4] or VC
Grant/Deny Decision Timeline	14 days	14 days	14 days	14 days
Days to Conduct the Meeting	30 days from meeting request receipt	90 days from meeting request receipt	28 days from meeting request receipt	90 days from meeting being granted
When to send CC[5] in Lieu of a Meeting Request	When a CC could adequately address the applicant's questions or when the applicant's clarification or scientific questions are outside of the scope of the meeting type. In addition, applicants can send CC after meetings if they are seeking further clarification or have new questions.			

General Notes.

- FDA may grant meetings to applicants in situations beyond those described in the GDUFA III commitment letter at its discretion, and in doing so generally considers the workload and availability of staff, and anticipated value to the ANDA assessment process.
- Days means calendar days in the tables above.

[1] Information on which drug products are considered complex can be found in the GDUFA III commitment letter and the GDUFA MAPP 5240.1 Classifying Approved New Drug Products and Drug-device Combination Products as Complex Products for Generic Drug Development Purposes.

[2] Meeting requests for non-complex products may be granted in some situations. See Footnotes 7, 8 and 10.

[3] WR can be provided if requested or agreed to by the applicant.

[4] FDA's goals are to respond to Level 1 CC within 60 days and Level 2 CC within 120 days.

[5] "In Person FTF" in the FTF meeting as described in the Guidance for Industry: "Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA" (October 2021) that is conducted in a hybrid format where some attendees participate in person at the FDA and remaining participate via VC. Beginning March 2023, PSB will resume in-person, face-to-face (FTF) meetings with inclusion in a phased-in approach. Initially, the in-person FTF meeting option will only be granted for PDEV and PSUB meetings for which the applicant requests the in-person FTF meeting format. Other GDUFA meetings, if granted, will be held fully virtually (e.g., as a VC), even if the applicant requests an in-person, FTF format.

[6] FDA may provide a T-con or WR, if requested by the applicant or if the meeting is granted at FDA's discretion.

[7] A PDEV meeting may be granted for a non-complex generic product if, at FDA's judgment, the prospective applicant submits a complete meeting package, a controlled correspondence would not adequately address the prospective applicant's questions, and the meeting would significantly improve ANDA assessment efficiency.

[8] A PSUB meeting may be granted for applicants who were not granted a PDEV meeting for the same complex generic product or for a non-complex generic product if FDA believes in its sole discretion that the PSUB meeting would improve assessment efficiency.

[9] Applicants have 7 days from receipt of the last mid-cycle DRL to submit a request for an MCRM or EMCRM.

[10] A post-CRL scientific meeting may be granted for a non-complex generic product if in FDA's judgement the request raises issues that are best addressed via this meeting process and cannot be adequately addressed through CC.

Abbreviation	Meaning
ANDA	Abbreviated New Drug Application
BE	Bioequivalence
CC	Controlled Correspondence
CGT	Complex Generic Therapy
CRL	Complete Response Letter
DRL	Discipline Review Letter
EMCRM	Enhanced Mid-Cycle Review Meeting
FTF	In-person, Face-to-Face Meeting
GDUFA	Generic Drug User Fee Amendments
MCRM	Mid-Cycle Review Meeting
PDEV	Product Development
PSG	Product-Specific Guidance
PSUB	Pre-Submission
T-con	Teleconference
VC	Videoconference
WR	Written Response

https://www.fda.gov/media/162239/download

Resources

- GDUFA III Commitment Letter
- MAPP 5240.10: Classifying Approved New Drug Products as Complex Products for Generic Drug Development Purposes
- GDUFA III Enhancement to the Pre-ANDA Program: https://www.fda.gov/industry/generic-drug-user-fee-amendments/gdufa-iii-enhancements-pre-anda-program
- ANDA Assessment Program – GDUFA III Performance Goals and Program Enhancements: https://www.fda.gov/industry/generic-drug-user-fee-amendments/anda-assessment-program-gdufa-iii-performance-goals-and-program-enhancements
  - **MCRM and EMCRM:** https://www.youtube.com/watch?v=CZh9Pjyyb0U
- GDUFA III Meeting-Related Guidances and MAPPs
  - Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA (Oct 2022)
  - Product-Specific Guidance Meetings Between FDA and ANDA Applicants Under GDUFA (Feb 2023)
  - Post-CRL Clarification T-con between FDA and ANDA Applicants Under GDUFA (Oct 2022)
  - Competitive Generic Therapies (Oct 2022)
  - MAPP 5220.8: Evaluating Requests for and Conducting Product Development and Pre-Submission Pre-ANDA Meetings (Oct 2022)


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