FDA-USP Collaboration and Partnership

Pallavi Nithyanandan, PhD
Director, Compendial Operations and Standards Staff (COSS)
Office of Policy for Pharmaceutical Quality/OPQ
Center for Drug Evaluation and Research
United States Food and Drug Administration

Pharmaceutical Quality Symposium 2023

Outline

- Introduction
- Overview of FDA- USP interactions
- Government liaison program
- FDA review process for USP Pharmacopeial Forum
- Role of industry
- Questions and Answers

Why Are Standards Important?

Consistency + Predictability + Credibility

= Science Based Decisions

USP-NF: Legal Status

FD&C Act Chapter II - Definitions:

- Sec. 201. [321] For the purposes of this chapter –
  - **(j)** The term "official compendium" means the official **United States Pharmacopoeia**, official **Homeopathic Pharmacopoeia of the United States**, official **National Formulary**, or any supplement to any of them.

USP-NF: Legal Status

The USP and NF official standards for strength, quality, purity, identity, packaging, and labeling can be used by FDA (via the FD&C Act) to support charges of:

- Adulteration [FD&C Act, Sec. 501(b)]
- Misbranding [FD&C Act - Section 502(g); 502(e)]

USP-NF: Legal Status

Adulteration Charge

- **FD&C Act CHAPTER V - DRUGS AND DEVICES**
  - **SEC. 501.** A drug or device shall be deemed to be **adulterated** –

    (b) "If it purports to be or is represented as a drug the *name of which is recognized in an official compendium*, and its *strength* differs from, or its *quality or purity* falls below, the standard set forth in such compendium…[unless] its difference in strength, quality, or purity from such standards is *plainly stated on its label.*"

USP-NF: Legal Status

Misbranding Charge

- **FD&C Act - Section 502:** a drug or device shall be deemed to be **misbranded**—
  - **(e)** unless it is labeled with the "established name," [the title as established by FDA, if any, or used in USP monograph, if any, or the "common or usual name"].
  - **(g)** If it purports to be a drug the name of which is recognized in an official compendium, unless it is *packaged* and *labeled* as prescribed therein.

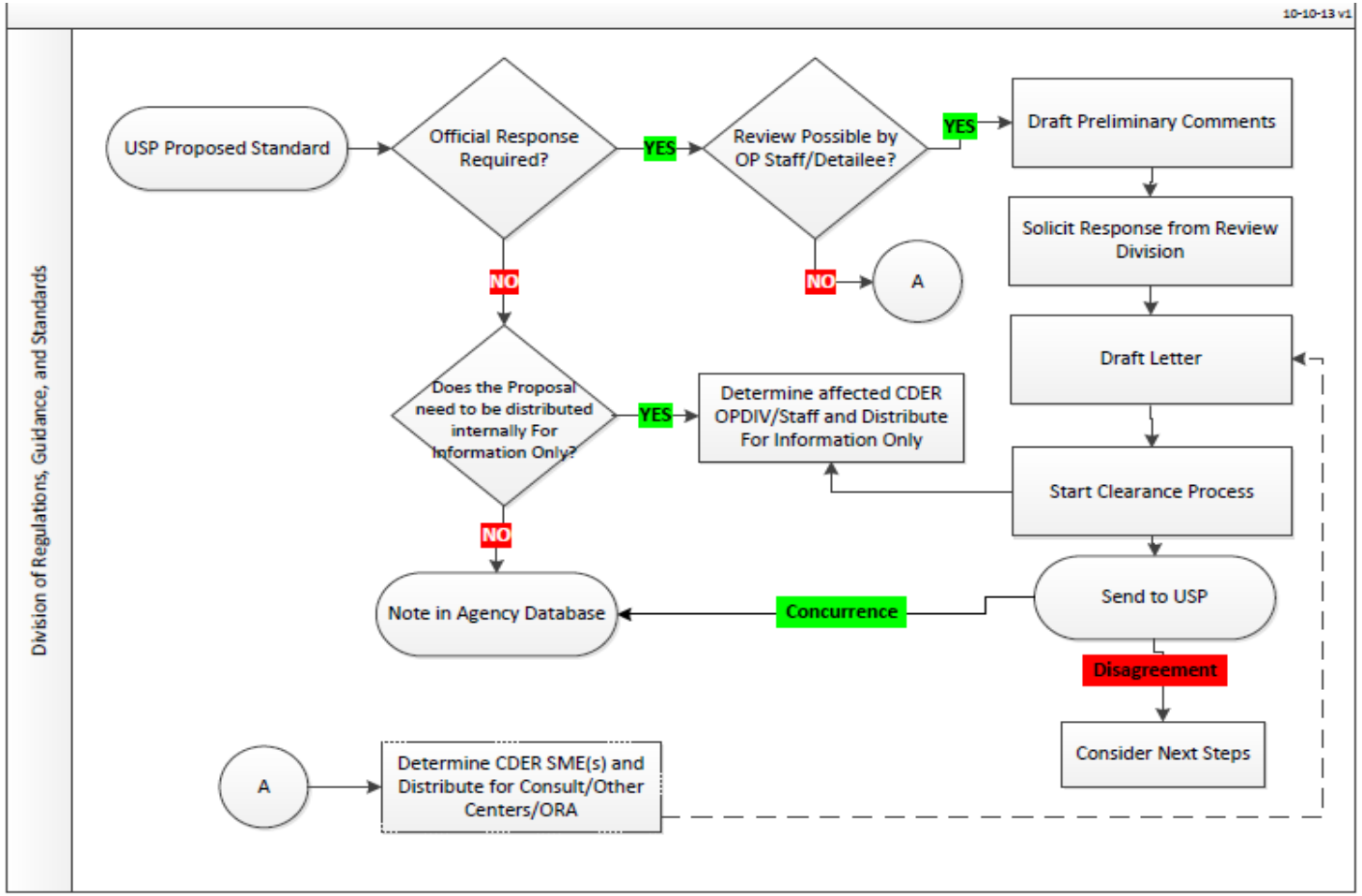
Government Liaison Program

Government Liaison (GL) Program

- FDA representatives on USP Expert Committees, Panels
- Participation by all FDA Centers, ORA, Commissioner's Office
- Currently 130+ CDER staff serve in the GL role
- Provide input on behalf of FDA
  - Enable alignment between FDA regulatory thinking and USP standards
  - Provide clarity for stakeholders
- Information shared within FDA as needed to develop feedback on proposals
- Coordinated by COSS

FDA Review and Comment of Pharmacopeial Forum

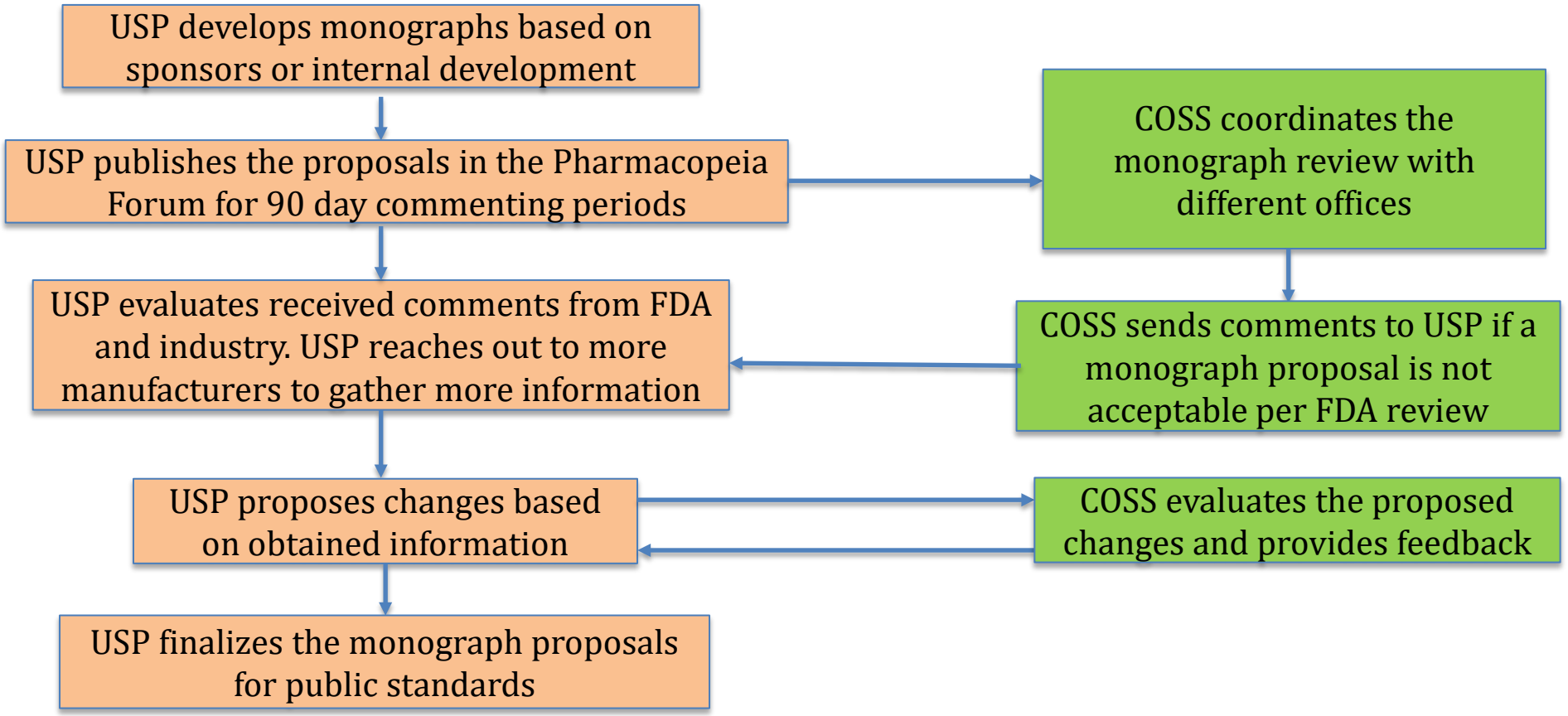
FDA Review: Revision Proposals in PF



Challenges for FDA Review and Comment

- FDA is unable to disclose specific information necessary for revising monographs, they must come from the applicant/DMF holder/manufacturer.
- Not practical for FDA to review information in each application/DMF while performing review of a monograph proposal
- Process employs sampling of applications.
- Impurity information and acceptance criteria are considered company confidential information unless already in the public domain.
- FDA comments indicate the problem with specific monograph section/s and recommend USP to contact manufacturers.

Interactions between FDA and USP for Monograph Development



Importance of USP Monograph Standards to FDA and Industry

- USP monograph standards are not only applicable to approved applications, but also significantly impact pending applications' review.
  - ➢ Can improve efficiency
    - ○ Provides information for product development (e.g., impurity profile, analytical procedure, acceptance criteria.)
    - ○ When firms follow USP method and acceptance criteria, method verification/demonstration of suitability of use is generally acceptable
  - ➢ Outdated monographs impede efficiency
    - ○ Can be misleading to firms during product development.
    - ○ If an applicant is following an outdated monograph , can lead to more review cycles.

Solutions- Role of Industry

- Applicants/DMF holders/manufacturers having a robust process for reviewing and commenting on USP monograph proposals published in Pharmacopeial Forum .
- Consider your data while commenting- If data indicates your product can meet a proposed criteria, there is no need to petition USP for wider acceptance criteria.
- Contributing improved analytical procedures to USP enable keeping USP monographs up-to-date, so they are beneficial to public health.

FDA-USP Interactions

- Active role in the review and comment of USP standards proposals, and, nomenclature ballots
- Email inquiries - Pre and post PF
- Liaison program management, COSS participation as liaisons to expert committees
- Meetings on broad impact policy issues
- Industry and other stakeholder engagement on compendial issues
- FDA-USP quarterly meeting
- Meetings between leadership of the two organizations
- USP Convention
  - USP Convention delegate/s and submit resolution proposals
  - Member of Council of the Convention
  - Member of Nominating Committee
- Pharmacopeial harmonization

Advantages of Up-to-date USP Standards

Modern USP Monograph Standards Can Potentially Provide:

- A public standard developed through a process that is open and provides for broad stakeholder input.
- A minimum legal standard for a Drug Product.
- Standardized quality and purity requirements for drug products across manufacturers.
- Equalized, standardized quality and purity requirements between OTC drug products and Rx drug products.
- Effective tools that can be used in FDA review and enforcement activities.
- FDA supports non-monograph standards for biologics.

Thank you for your time!