

OGD UPDATE:

Welcome to much more than GDUFA II

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AAM GRx+Biosims Conference
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Disclaimer

- This presentation reflects the views of the speaker and do not reflect official FDA, HHS, or other government opinion or policy.
- I have nothing to disclose.



OFFICE OF GENERIC DRUGS (OGD) UPDATE

- Typically “Year in Review”
- But September is too early for FY2018 report out
- FY2018 data closeout/validation will not occur for several months
- Please refer to numerous reporting requirements:
 - Monthly, quarterly, annually
 - GDUFA II
 - Monthly Performance Report
<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/HowDrugsareDevelopedandApproved/ApprovalApplications/AbbreviatedNewDrugApplicationANDAGenerics/ucm375079.htm>
 - Quarterly Performance Report
<https://www.fda.gov/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/GenericDrugs/ucm600678.htm>
 - FDARA (unfunded mandates)
 - Section 807 Quarterly Report of Priority Review and CGTs
<https://www.fda.gov/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/GenericDrugs/ucm596532.htm>
 - Section 903 Quarterly Report of Guidances and Public Meetings
<https://www.fda.gov/downloads/RegulatoryInformation/LawsEnforcedbyFDA/SignificantAmendmentstotheFDCAact/FDARA/UCM606015.pdf>

OUTLINE

1. Status of Generic Drug Program
2. OGD Accomplishments
3. GDUFA II
4. Non-GDUFA activities
5. Closing Comments

STATUS OF GENERIC DRUG PROGRAM

GENERIC DRUG PROGRAM

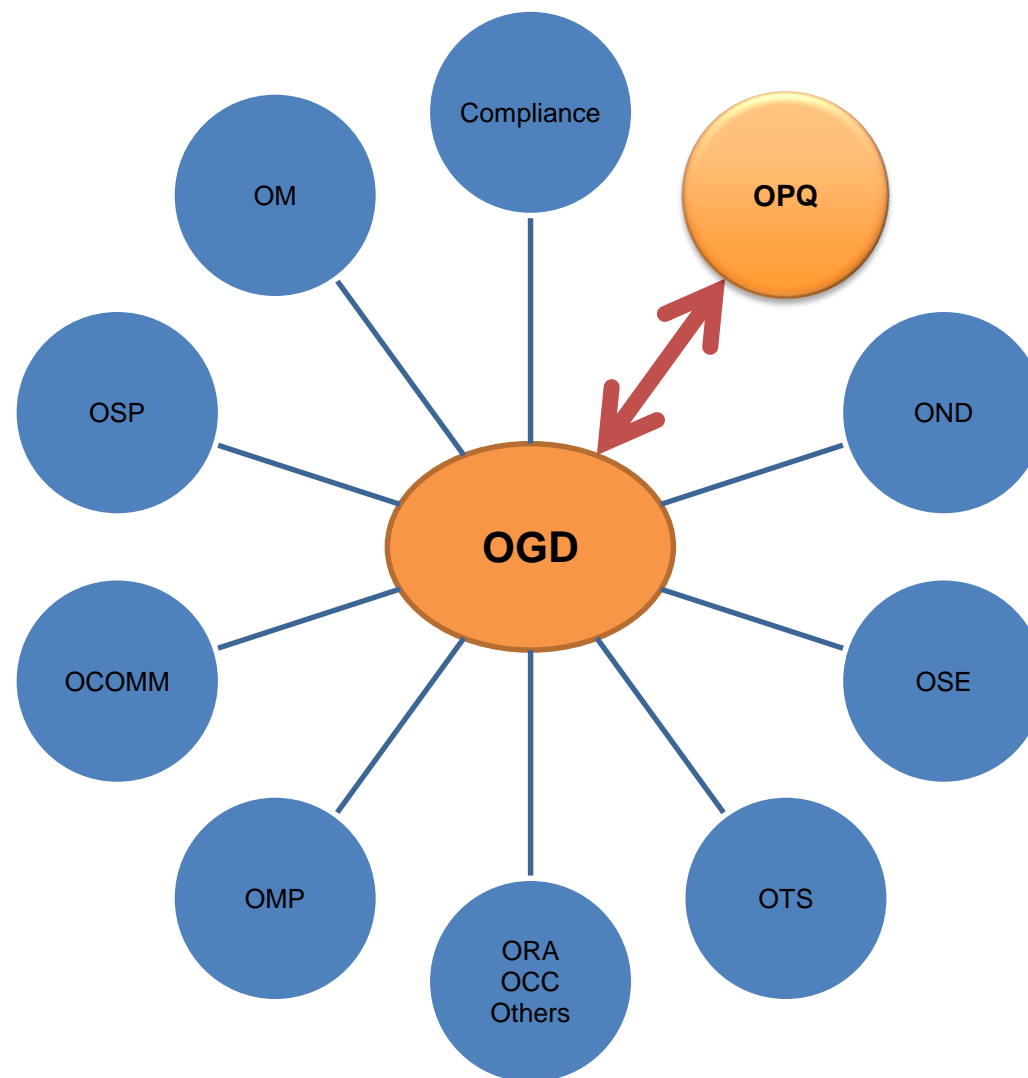
Current State



- FDA's generic drug program and OGD are in excellent shape
- FDA is meeting or exceeding the GDUFA goals
- Numerous significant accomplishments
- Standing up/implementing GDUFA II
- Evaluating and implementing FDARA
- Performing a variety of non-GDUFA activities

FDA's GENERIC DRUG PROGRAM

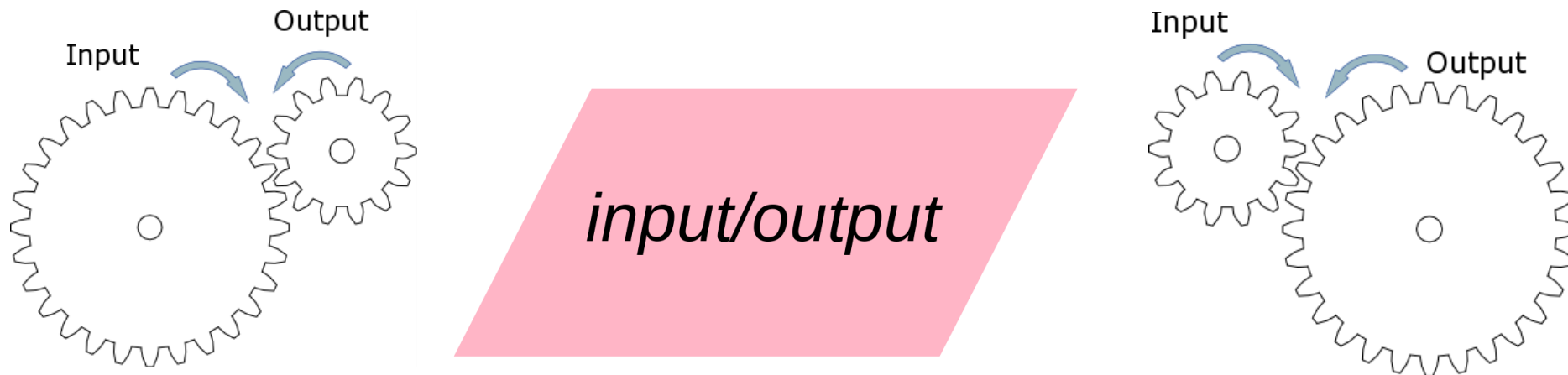
- OGD is not “THE” generic drug program
- OGD interfaces with applicants to coordinate the review of ANDAs
- OGD issues regulatory action on ANDAs
- **OPQ and OGD** work very closely to evaluate Pharmaceutical Quality, Filing, Bioequivalence, Labeling, and other review activities
- FDA's Generic Drug Program involves:
 - All CDER offices
 - ORA
 - Office of the Commissioner, esp. Office of Chief Counsel (OCC)
 - CDRH
 - CBER



GENERIC DRUG PROGRAM

Program Data/Analytics

- FDA’s generic drug program is in “Steady State”
- All ANDA submissions have GDUFA goals, as of 8/1/18
 - “Bridging” of GDUFA I pre-Year 3 ANDAs - COMPLETE



GENERIC DRUG PROGRAM

Program Data/Analytics

- Regulatory action “OUT” reflects number of submissions “IN”
 - *True, but not for the same month*

- Monthly statistics will show variability in FDA output
 - *True, and as expected - Number of regulatory actions (TA/AP, CR letters) issued (OUTPUT) in any given month are the direct result of the types of submissions (INPUT) in previous months and their GDUFA goal dates*

- Misstatements about program output:
 - “OGD's full approval total also exceeded the submission total for the fourth time in FY 2018, an indication of an overall workload reduction.”
 - Actions (OUTPUT) in any given month are not related to submissions (INPUT) for the same month
 - No sign of workload reduction
 - (848 ANDAs, 1,887 Amendments, 5,434 CBEs, 933 PAS, 2,460 controls – for first 10 months of FY2018)*
 - “FDA can only remove ANDAs from its books if they are approved...”
 - Once regulatory action is issued, i.e., AP, TA, CR, or RTR, the ANDA is off FDA’s books and the GDUFA clock stops

*Activities Report of the Generic Drugs Program (FY 2018) Monthly Performance.

<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/HowDrugsareDevelopedandApproved/ApprovalApplications/AbbreviatedNewDrugApplicationANDAGenerics/ucm375079.htm>

- Generic Approvals: <https://www.raps.org/news-and-articles/news-articles/2018/7/generic-approvals-rebound-as-first-generics-dont>

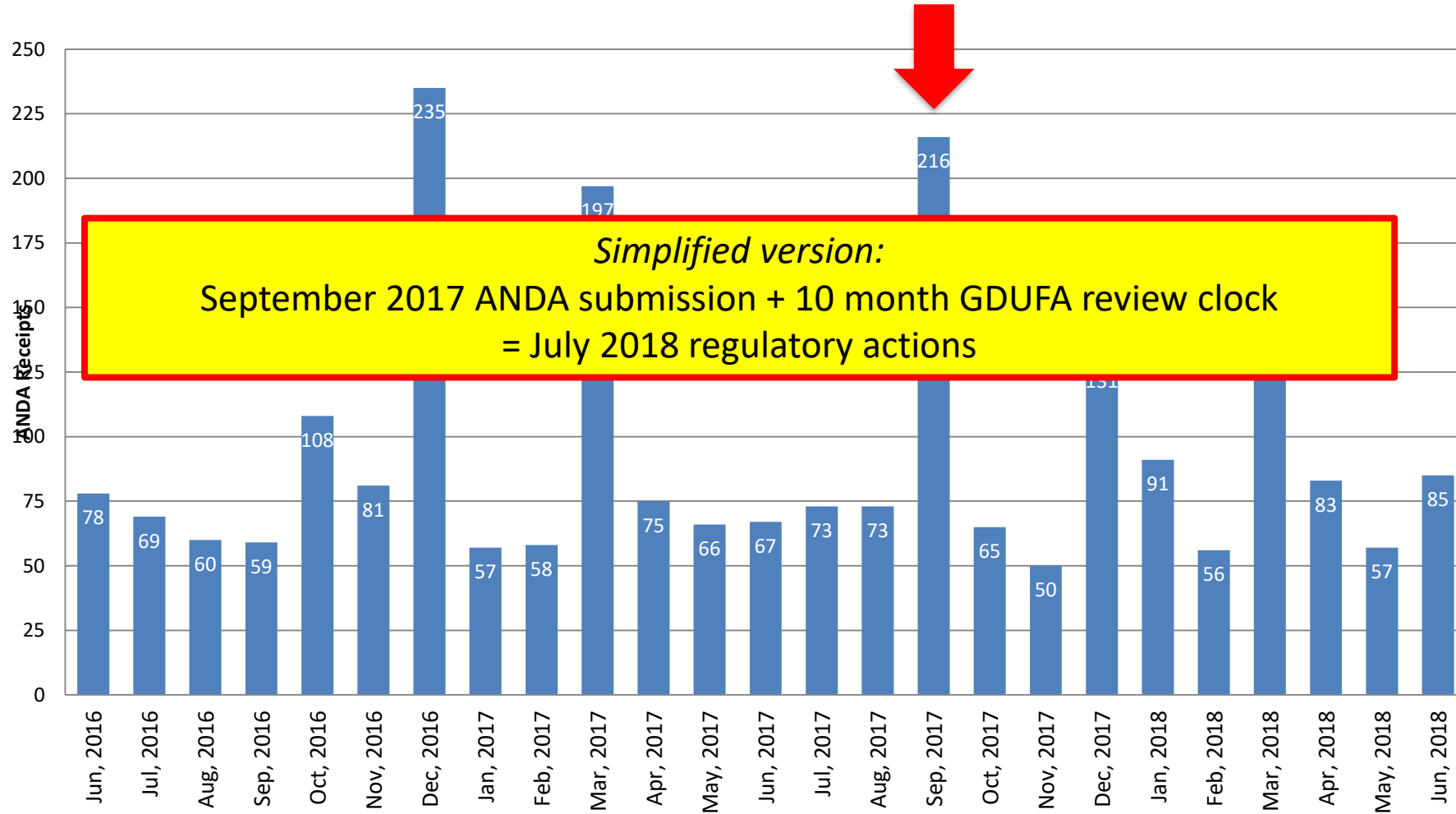
- Generic Drug Snapshot: <http://www.lachmanconsultants.com/2018/06/ogd-releases-2nd-quarter-generic-drug-snapshot-on-its-dashboard/>

- <https://pink.pharmaintelligence.informa.com/PS123675/Generic-Review-At-US-FDA-Record-Month-Completes-Approval-Volume-Recovery>

GENERIC DRUG PROGRAM

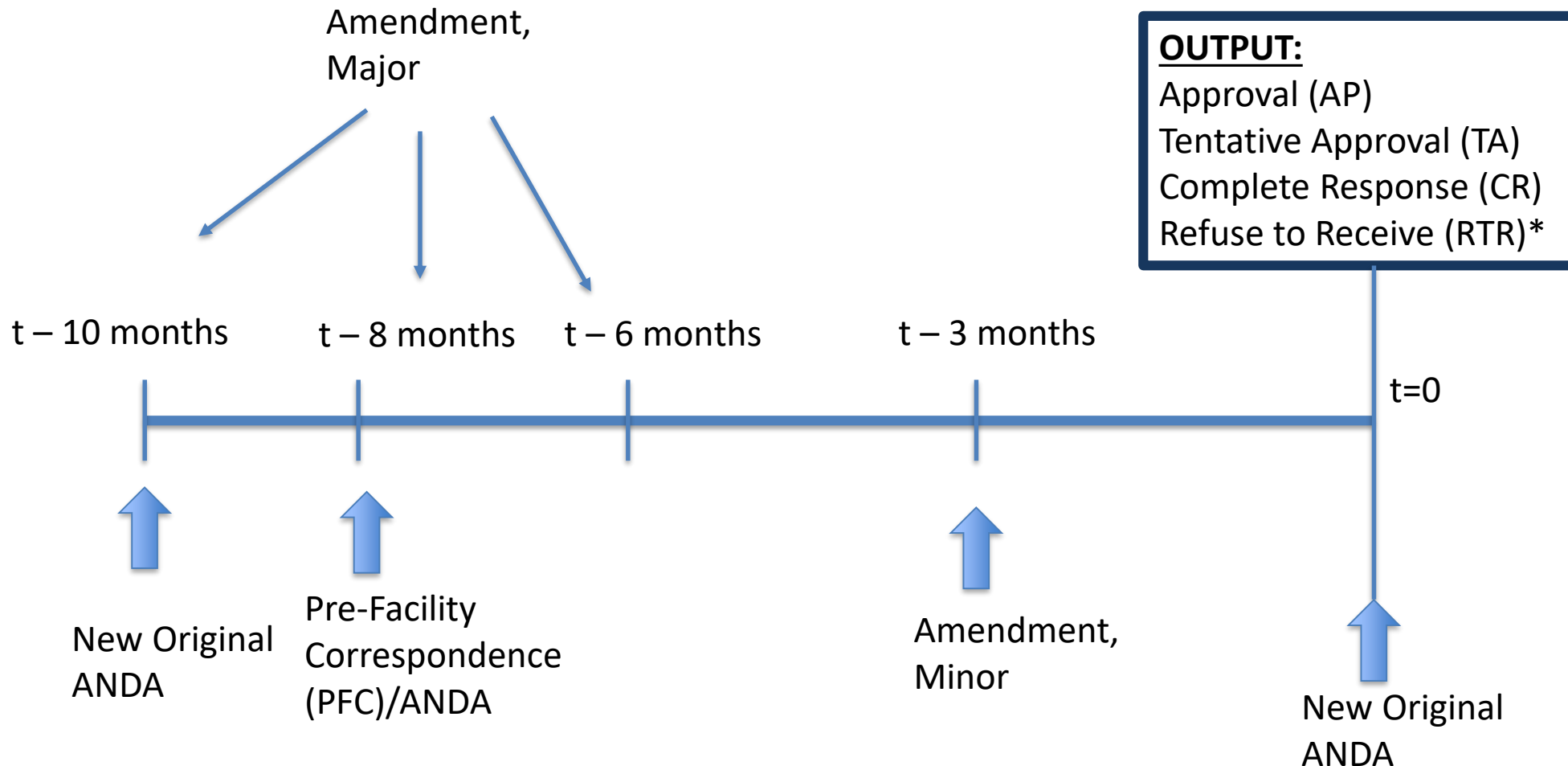
Variable Submission Volume

(New Originals)



* Updated 7/1/2018. Numbers are based on preliminary data that will be reviewed and validated for official reporting purposes.

Variable Submission Volume & GDUFA Goal Dates



*RTR output is closely linked to time of original ANDA submission, e.g., within 60 days of submission.

GENERIC DRUG PROGRAM

Ongoing Challenges

1. Large number of RTRs
2. Low first cycle approvals
3. In general, multiple review cycles to AP/TA

Inefficient and leads to a huge amount of re-work for FDA and applicants alike

REFUSE TO RECEIVE (RTR)

- During GDUFA I, many ANDAs submitted received RTR
- ~1% due to fees not paid and this continues to occur
- OGD has a robust, high quality process for filing review

	% ANDAs RTR-ed*
FY2015 (GDUFA I Year 3)	19
FY2016 (GDUFA I Year 4)	25
FY2017 (GDUFA I Year 5)	13
Overall for GDUFA I	~20¥
FY2018** (GDUFA II)	~9

*Updated 7/31/2018. Numbers are based on preliminary data that will be reviewed and validated for official reporting purposes.

¥ - During GDUFA I, the RTR percentage decreased slightly after RTR Guidance was revised and certain deficiencies (e.g., environmental impact analysis statement, English translation) were classified as minor deficiencies.

**FY2018 – Partial year data, reflects ANDAs submitted up to May 2018.

TOP 3 REASONS* FOR RTR

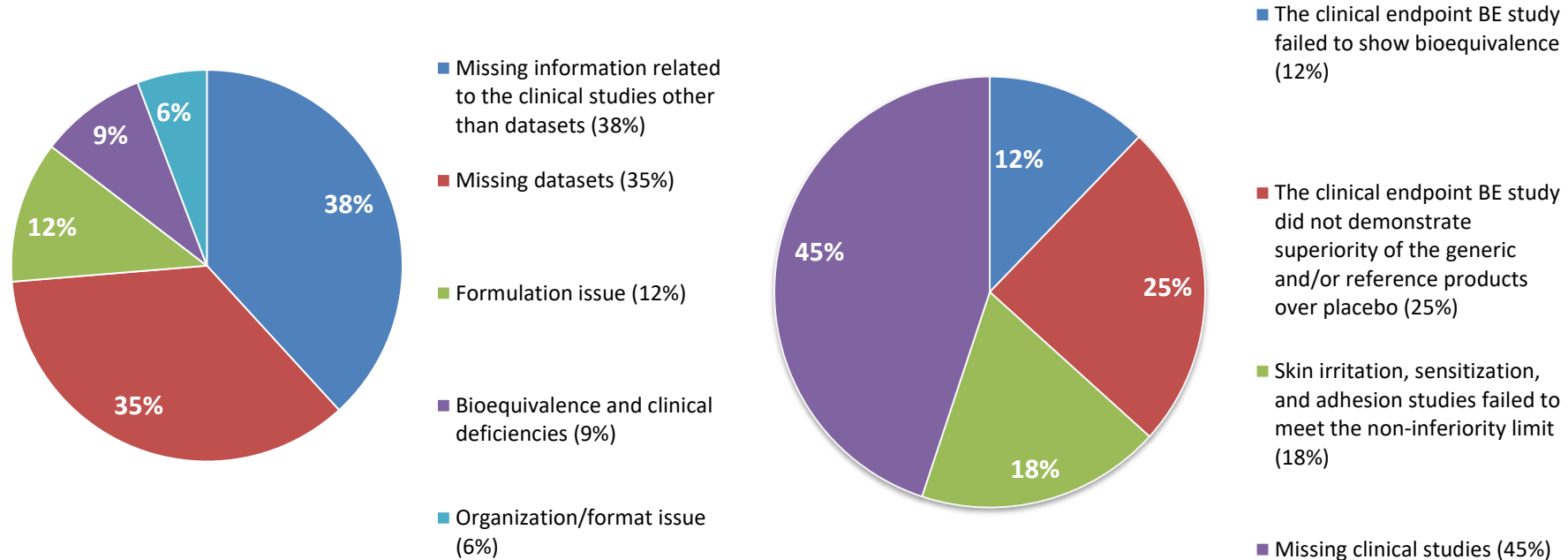
DEFICIENCY

- 1. Inadequate Stability**
- 2. Inadequate Dissolution**
- 3. Impurities**

* Analysis of FY2017 Year 5 cohort: 168 RTRs on 1,320 ANDAs.

FILING DEFICIENCIES

ANDAs with Clinical Endpoint Studies



BOTTOM LINE:

- Submit FULL clinical study reports including all data sets.
- Majority of RTRs due to missing data sets and missing information related to the clinical studies.

“RTR” is a lifetime blemish on an ANDA AND Indicator of poor application quality

- If ANDA received RTR....
 - Fewer 1st cycle AP or TA
 - More deficiencies in Complete Response Letter(s)
 - Worse (“major”) deficiencies
 - Quick turnaround of RTR with re-submission results in even lower likelihood for AP or TA
- NOTE TO INDUSTRY: Slow down and QA/QC the entire ANDA before submitting/re-submitting

OGD EFFORTS

Preventing an RTR

- GUIDANCES

- RTR Standards Revision 2 (GDUFA I Required Guidance)
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM578368.pdf> (Final 12/21/16)
- RTR Standards Q&A Draft Guidance
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM578368.pdf> (Draft 10/2/17)
- Lack of Justification of Impurity Limits Guidance
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM414598.pdf> (Final 8/24/16)
- Content and Format of ANDA Draft Guidance
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM400630.pdf> (Draft 6/11/14)
- Good ANDA Submission Practices Draft Guidance
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM591134.pdf> (Draft 1/3/18)

- MAPPs

- Filing Review of ANDAs (MAPP 5200.14; essentially an ANDA Filing Checklist)
<https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ManualofPoliciesProcedures/UCM574493.pdf> (September 2017)
- Communicating Certain Deficiencies Identified During Filing Review of ANDAs (MAPP 5220.3)
<https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ManualofPoliciesProcedures/UCM578093.pdf> (September 2017)
- Good ANDA Assessment Practices (MAPP 5241.3)
<https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ManualofPoliciesProcedures/UCM591143.pdf> (January 2018)

FIRST CYCLE ANDA APPROVALS[¥]



Prior to GDUFA	< 1%
FY2015	11.6%
FY2016	14.7%
FY2017*	~10%
FY2018**	TBD
DOSAGE FORM: Injectables > solid oral > others	

* Updated 5/1/2018. Numbers are based on preliminary data that will be reviewed and validated for official reporting purposes. Some FY2017 ANDAs are under review and within goal.

**FY2018 – ANDAs are under review and within goal; the majority of FY2018 ANDAs have not reached their GDUFA goal date.

[¥] **DEFINITION:** The percentage of AP and TA original and original-response to RTR ANDAs that were received for extensive review AND were given a regulatory decision (excluding ANDAs under review).

OGD review disciplines

First-cycle approvability



- **Bioequivalence**

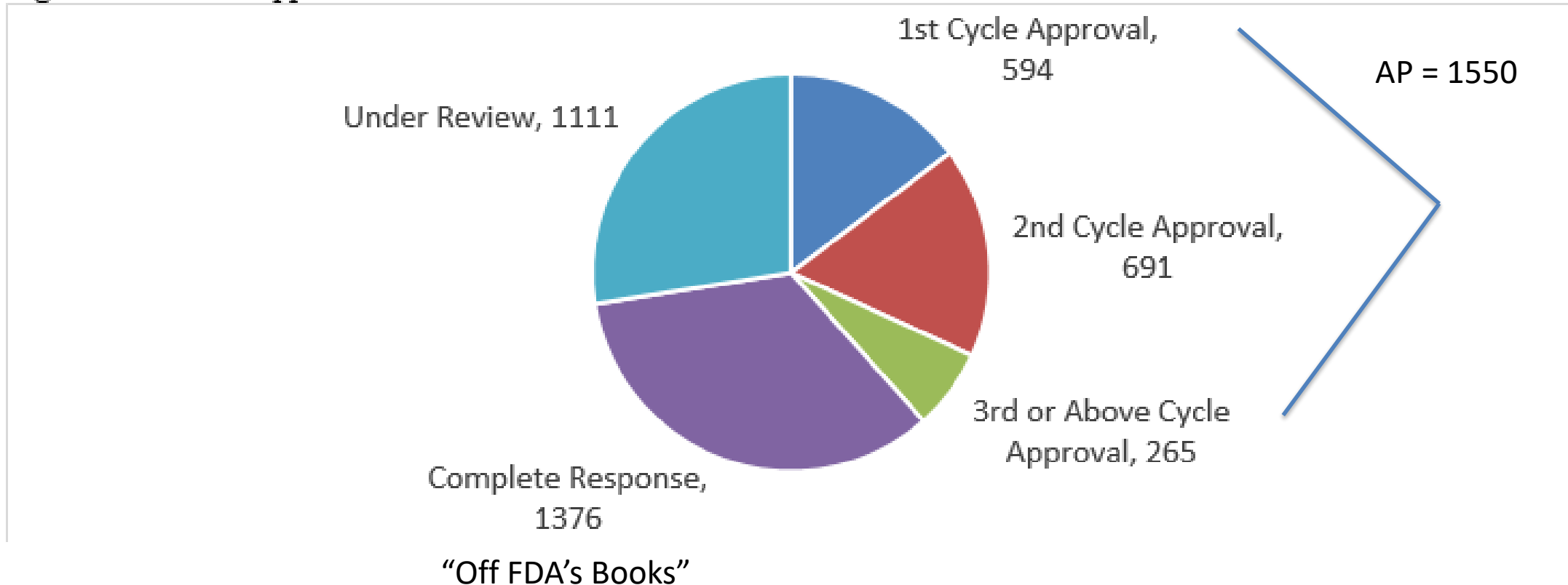
- >70% “adequate” decisions in the first cycle
- High rate of adequate bioequivalence reviews due to availability of product-specific guidances

- **Labeling**

- Large % are “adequate” at end of first full review cycle
- HOWEVER, almost all have deficiencies that require correction as communicated to applicant with IRs and/or DRLs
- RLD/USP/Patent & Exclusivity constantly changing resulting in additional labeling deficiencies and cycles

GDUFA I ANDAs*

Figure 1 Application Status for GDUFA I ANDAs



*Data as of 5/31/2018, Data Source: ANDAs originally submitted during GDUFA I, internal FDA database. Data generated by CDER/OTS/OB, Jingyu (Julia) Luan, PhD, Jing Han, PhD, and Stella Grosser, PhD.

REVIEW EFFICIENCIES

Reduce Cycles to Approval



Under FDA control

- Format
- Data requirements
- Product Specific Guidances (PSGs)
- Streamlining processes
- Ancillary assistance (consults/other disciplines)

Under Industry control

- Missing data
- Deviation from PSG without adequate justification
- Data integrity
- Non-standard statistical/analytical methods
- Incorrect Formulation development
- Facility problems



UNDER INDUSTRY CONTROL

Tell the “story” of your ANDA

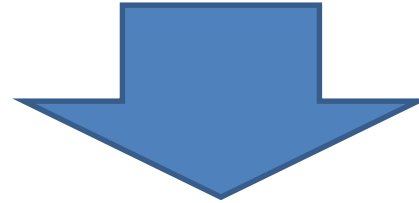
- Use ANDA to demonstrate you know your product and all critical aspects of the RLD; capture that knowledge in your application
- Organize information to tell the story
 - Use clear labels and figures; make data easy to read and compare
- QA/QC application before submission
 - Correct omissions, minimize duplication, proofread
 - **OGD Filing review is NOT a QA/QC function for industry** but rather a regulatory decision, “acceptable for filing”, i.e., that the ANDA is sufficiently complete to allow for scientific review
- Know your audience
 - FDA reviewers/assessors are very detail-oriented
 - Don’t make them hunt for information/data

UNDER INDUSTRY CONTROL

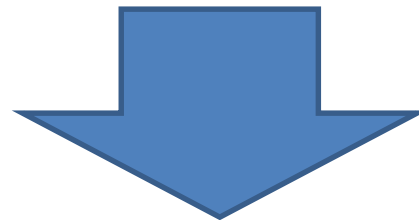
Completeness of Submissions

- “Right the First Time”
- Timely and complete responses to FDA Information Requests, DRLs, other communications
 - Timely is important, but getting it correct and providing the right data to FDA is most critical
- All legal documents and relevant updates related to court findings (e.g., patent/exclusivity) have been submitted to ANDA

GDUFA

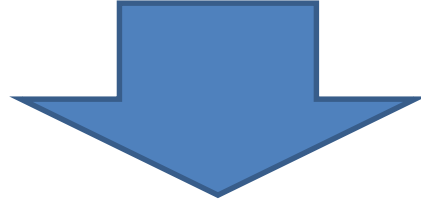


**TRANSFORM THE PROGRAM
and
PERFORM WHILE TRANSFORM**

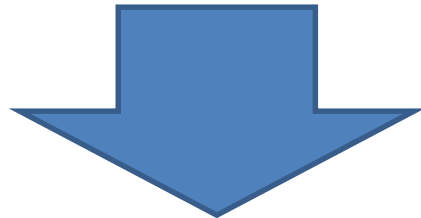


NEED TO BUILD A QUALITY SYSTEM

GDUFA



**TRANSFORM THE PROGRAM
and
PERFORM WHILE TRANSFORM**



FDA BUILT A QUALITY SYSTEM
Exemplary drug regulatory program

OGD ACCOMPLISHMENTS

NOTABLE ANDA APPROVALS

DATE	Generic Name	RLD	Indication*
10/2017	Sodium acetate injection	Sodium Acetate	Hyponatremia
2/2018	Glatiramer acetate injection pre-filled syringe	Copaxone	Multiple sclerosis
3/2018	Cinacalcet HCl tablets	Sensipar	Hyperparathyroidism
4/2018	Everolimus tablets	Zotress	Transplant rejection
4/2018	Colesevelam HCl tablets	Welchol	Hypercholesterolemia
5/2018	Tadalafil tablets	Cialis	Erectile dysfunction
6/2018	Buprenorphine HCL and Naloxone sublingual film	Suboxone	Opioid dependence
8/2018	Epinephrine autoinjector	EpiPen	Allergic reactions and anaphylaxis

*Indication is truncated from full product labeling

NOTABLE ANDA APPROVALS

- 1st new, original ANDA submitted in GDUFA II was approved; a 1st cycle approval (August 2018)
- 1st Competitive Generic Therapy (CGT) designated approval (August 2018)
- July 2018 – largest output in single month ever
 - 96 AP, 30 TA, 357 CRs
 - Result of:
 - Large number of September 2017 original ANDA submissions
 - GDUFA II bridging goal date for pre-Year 3 GDUFA I ANDAs
 - Other submissions with July 2018 GDUFA goal dates
 - (see slides 9-11)

OGD ACCOMPLISHMENTS

Implemented new pre-ANDA program for complex generic drug products per GDUFA II

- 68 pre-ANDA meeting requests*
 - Double the pre-GDUFA II number
 - 100% grant/deny within 30 days
 - 100% granted meetings within 120 days

* Data as of 8/8/18

OGD ACCOMPLISHMENTS

Guidances for Industry*



- ANDA Submissions – Amendments (final 7/3/18)
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM404440.pdf>
- Good ANDA Submission Practices (draft 1/3/18)
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM591134.pdf>
- Determining Whether to Submit an ANDA or 505(b)(2) application (draft 10/11/17)
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM579751.pdf>
- General Principles for Evaluating the Abuse Deterrence of Generic Solid Oral Opioid Drug Products (final 11/21/17)
<https://www.fda.gov/downloads/Drugs/.../Guidances/UCM492172.pdf>
- ANDAs for Certain Highly Purified Synthetic Peptide Drug Products that Refer to Listed Drugs of rDNA Origin (draft 10/2/17)
<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM578365.pdf>
- Product Specific Guidances** : 89 new and 59 revised, including 22 for inhalation drug products

* This does not represent a complete list of Guidances for Industry published by OGD in FY2018.

** Data as of 8/8/18.



OGD ACCOMPLISHMENTS

- Orange Book Updates
 - Addition of patent submission date
 - Receiving/processing one-time marketing status updates for products in the active section (FDARA requirement)

OGD ACCOMPLISHMENTS

Communication

REQUIRED:

- GDUFA [Performance Reports](#)
- GDUFA [Financial Reports](#)
- GDUFA [Quarterly Performance Report](#)
- FDARA [Quarterly Report of Priority Review and CGTs](#)
- FDARA [Quarterly Report of Guidances and Public](#)



The screenshot shows the FDA website's 'Generic Drugs' page. At the top, there is the FDA logo and navigation links for Home, Food, Drugs, Medical Devices, Radiation-Emitting Products, Vaccines, Blood & Biologics, Animal & Veterinary, Cosmetics, and Tobacco Products. Below this is a search bar and a breadcrumb trail: Home > Drugs > Resources for You > Information for Consumers (Drugs) > Buying & Using Medicine Safely > Generic Drugs. The main content area features a sidebar with links for Overview & Basics, Industry Resources, Approvals & Reports, Science & Research, and Patient Education. The main heading is 'Generic Drugs' with social media sharing options. Below this is a banner with the text 'Have questions about generic drugs? Get the facts' and images of generic and brand name pills. A section titled 'Spanish Language version - Medicamentos Genéricos' follows, with a paragraph explaining that 9 out of 10 prescriptions filled are for generic drugs. Below this is a list of bullet points: 'Managing the regulatory process to facilitate drug approvals', 'Establishing science initiatives to research generic drugs', 'Publishing data and reports on generic drug development and review, and', and 'Offering educational materials and information'. At the bottom left is a 'New Educational Materials' box with a brain icon and the text 'See new TV PSA, Prescriber Ads, and more!'. At the bottom right is a 'Overview & Basics' box with a pill icon and the text 'Information about the generic drug review process, FDA standards and pricing, and answers to frequently asked questions'.

ENHANCED:

- Updated web presence www.fda.gov/genericdrugs
- GDUFA [Annual Regulatory Science Research Report](#)
- [Monthly Activities Report of the Generic Drug Program](#)
- [Quarterly Meeting Minutes Between FDA and Industry](#)
- Quarterly [Generic Drug Review Dashboard](#) (*last published April 2018*)
- ANDA [First Generic Drug Approvals](#)
- Office of Generic Drugs [Annual Reports](#)
- Generic Drugs Updates and GDUFA [listservs](#)
- [Generic Drugs Patient and Prescriber Education Campaigns](#)
- [Meetings](#)
- [Webinars](#) (in collaboration with DIA)
- [2018 Generic Drugs Forum](#)

OGD ACCOMPLISHMENTS

GDUFA II Outreach Videos



Brief videos by FDA staff highlighting new features in GDUFA II on FDA.gov:

- [GDUFA Overview](#)
- [Pre-ANDA Program for Complex Products](#)
- [Type II Drug Master Files \(DMF\) Update](#)
- [Performance Goals](#)
- [Goals Integration](#)
- [Review Status Updates](#)
- [Post Complete Response Letter \(CRL\) Meeting](#)
- [Requests for Reconsideration](#)
- [Review Classification](#)



OGD ACCOMPLISHMENTS

DIA Podcasts/Webinars

“Innovation in Generics”

OGD Speaker		
Maryll Toufanian, JD	An Introduction to Generic Drugs – Hatch Waxman Overview	Podcast- Recorded
Xiaohui (Jeff) Jiang, PhD	An Overview of Challenges and Opportunities in the Development of Complex Generic Drug Products	March 6, 2018 2:00 pm
Kim Witzmann, MD	Overcoming Barriers to Entry for Complex Generic Oral Inhalation Drug Products	March 15, 2018 3:00 pm
Sam Raney, PhD	FDA Champions Research to Make Complex Generic Transdermal Products Available to Patients*	April 25, 2018 2:00 pm
Liang Zhao, PhD	Pioneering Modeling Methodologies in Generic Drug Development	May 17, 2018 1:00 pm



OGD COMMUNICATIONS

CDER Small Business and Industry Assistance (SBIA)

Newly issued Guidance Webinars

OGD Speaker	Webinar Topic	Date
Elizabeth Giaquinto Friedman, JD, LLM	<u>ANDA Submissions – Amendments to Abbreviated New Drug Applications under GDUFA final guidance</u>	July 2018
Philip Bonforte, JD	<u>Information Requests and Discipline Review Letters under GDUFA draft guidance</u>	December 2017
Lisa Bercu, JD	<u>Controlled Correspondence Related to Generic Drug Development draft guidance</u>	November 2017
Tamara Coley, JD	<u>Post-Complete Response Letter Meetings Between FDA and ANDA Applicants Under GDUFA draft guidance</u>	November 2017
Elizabeth Giaquinto Friedman, JD, LLM	<u>Determining Whether to Submit an ANDA or 505(b)(2) Application draft guidance</u>	October 2017
Elizabeth Giaquinto Friedman, JD, LLM	<u>Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA draft guidance</u>	October 2017

Chinese translations for SBIA resources are located here -

<https://www.fda.gov/Drugs/DevelopmentApprovalProcess/SmallBusinessAssistance/ucm559631.htm>

OGD ACCOMPLISHMENTS

Scientific Publications

- **Numerous OGD scientific publications** found at: [Science & Research “Publications and Resources” page](#)
- [Effects of Formulation Variables on Lung Dosimetry of Albuterol Sulfate Suspension and Beclomethasone Dipropionate Solution Metered Dose Inhalers](#) (AAPS PharmSciTech, June 2018)
- Overview of the Generic Drug Program and Surveillance, DIA Journal, May 2018
<http://journals.sagepub.com/doi/abs/10.1177/2168479018774557>
- [Nanotechnology Characterization Laboratory Unveils New Technical Services for Drug Developers](#) (National Cancer Institute, March 2018)
- [Modeling to Speed Tricky Generic Development](#) (AAPS News, February 2018)
- [Paying it Forward: A kidney transplant patient shares how joining a clinical trial helped her family — and others](#) (University of Cincinnati Health, December 2017)
- [Lamotrigine Generics Equal to Brand—Single-dose study of generic antiepileptic drug finds minimal differences](#) (MedPage Today, June 2017)
- [US FDA Pushing For Generic Alternatives To Long-Acting Injectables, Implants](#) (The Pink Sheet, March 2017)

OGD ACCOMPLISHMENTS



Workshops on Complex Generic Drug Products

- Oct. 2-3, 2017: Leveraging Quantitative Methods and Modeling to Modernize Generic Drug Development and Review
 - <https://www.fda.gov/Drugs/NewsEvents/ucm554182.htm>
- Oct. 6, 2017: Demonstrating Equivalence of Generic Complex Drug Substances and Formulations
 - <https://www.fda.gov/Drugs/NewsEvents/ucm552461.htm>
- Oct. 20, 2017: Topical Dermatological Generic Drug Products: Overcoming Barriers to Development and Improving Patient Access
 - <https://www.fda.gov/Drugs/NewsEvents/ucm557252.htm>
- Jan. 9, 2018: New Insights for Product Development and Bioequivalence Assessments of Generic Orally Inhaled and Nasal Drug Products
 - <https://www.fda.gov/Drugs/NewsEvents/ucm576064.htm>
- **Sept. 12-13, 2018: Complex Generic Drug Product Development Workshop**
 - https://events-na12.adobeconnect.com/content/connect/c1/1315899612/en/events/event/shared/1956258287/event_landing.html?scoid=1956288436& charset =utf-8

OGD COMMUNICATIONS

Workshops for Industry



FDA/CDER Small Business and Industry Assistance (SBIA) Regulatory Education for Industry (REdI): Generic Drugs Forum 2018

<https://www.fda.gov/drugs/developmentapprovalprocess/smallbusinessassistance/ucm598753.htm>

- April 11-12, 2018
- Up-to-date information on program progress and current initiatives
- Over 1,000 participants from around the world
- Opportunity to interact with FDA subject matter experts involved in the Generic Drug Review Program

FREE, open to the public, streamed live and with enduring materials on the internet

OGD ACCOMPLISHMENTS

Science, Research & Communication

Please see:

- “Generic Drug Science and Research”
 - <https://www.fda.gov/drugs/resourcesforyou/consumers/buyingusingmedicinesafely/genericdrugs/ucm567695.htm>
- “Generic Drugs Priorities and Projects”
 - <https://www.fda.gov/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/GenericDrugs/ucm585132.htm>

GDUFA II (clarifications)

GDUFA II

– Numerous review program enhancements

- Mid-cycle & post CR t-cons, ability to dispute a variety of CDER actions
- More touch points with industry pre-, during, and post-submission

– Pre-ANDA program for complex products

- Meetings, timeframes for Product-Specific Guidances, updates to Inactive Ingredients Database (IID)
- <https://www.fda.gov/Drugs/ResourcesForYou/Consumers/BuyingUsingMedicineSafely/GenericDrugs/ucm578012.htm>

– “PFC” – Pre-submission Facility Correspondence

- Priority Submission with PFC - 8 month goal

– DMF enhancements

– Accountability and reporting enhancements

– Small business relief

REVIEW PROGRAM ENHANCEMENTS

- FDA committed to:
 - Information requests (IRs) and/or mid-cycle discipline review letters (DRLs) from disciplines assessing/reviewing ANDAs at or about mid-cycle
 - This applies ONLY to GDUFA II new original ANDAs, i.e., those new original ANDAs submitted on or after October 1, 2017
 - (If resources permit, IRs and/or DRLs may be issued for other submission types, but this is not a GDUFA II commitment)

PRE-ANDA PROGRAM FOR COMPLEX GENERIC DRUG PRODUCTS

- Research, PSGs, meetings
- Three types of meetings
- Not PDUFA style Type “A” meetings
- Guidance for Industry – Formal Meetings Between FDA and ANDA Applicants of Complex Products Under GDUFA

<https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM578366.pdf> (Draft 10/2/17)

- See What’s Important to Consider When Developing a Complex Generic Drug? on Wednesday 9/4/18
 - Presentation by Rob Lionberger (OGD ORS)

SMALL BUSINESS RELIEF

- Altered fee structure
 - Annual facility fee on approved ANDAs only
 - Lower program fees for smaller companies commensurate with the number of approved ANDAs
 - No per-ANDA submission fee
 - CMOs pay 1/3 the annual fee paid by firms that manufacture under ANDAs they own
- **NOTE:** All companies, regardless of size, must meet all the regulatory standards for ANDA approval
- See Update on GDUFA and BsUFA User Fees on Thursday 9/5/18 (numerous FDA speakers)



GDUFA II

“Goals” or “Commitment” letter:

<http://www.fda.gov/downloads/forindustry/userfees/genericdruguserfees/ucm525234.pdf>

PLEASE READ!

NON-GDUFA ACTIVITIES

Commissioner's Drug Competition Action Plan (DCAP)

1. Streamline ANDA review process to increase efficiency, effectiveness, and output of approvals
 2. Enhance development and review of complex generic drug products
 3. Reduce “gaming” that delays generic drug approval and extends monopoly beyond what Congress intended
- Aligns with GDUFA II main objectives
 - See Presentations by Ann Abram (FDA Keynote) and Maryll Toufanian (OGD Policy)

HARMONIZATION EFFORTS

- FDA is focusing efforts that harmonize on scientific and technical aspects while respecting and acknowledging regulatory and legal differences
 - Venues of activity:
 - ICH - “Q” documents applicable to both brand and generic drug products
 - Mutual Recognition Agreement (MRA)
 - FDA and EU regulators able to utilize each other’s GMP inspections of pharmaceutical manufacturing facilities
 - IPRP member (consolidation of IGDRP & IPRF)
 - Engagement with other Regulatory Bodies (e.g., EMA-FDA bilateral)
 - ICH efforts will succeed for generics only if both regulators AND industry dedicate adequate resources to efforts
- See Harmonization Opportunities for the Generic Industry through ICH – Topic on Wednesday 9/4/18
- Theresa Mullin, CDER Associate Director for Strategic Initiatives

Non-GDUFA activities*

- FDARA implementation
- Suitability Petitions
- Bio-INDs
- CBEs
- Safety Labeling Changes
- FTC requests
- ANDA consolidation requests
- ANDA withdrawals
- S/E Determinations
- Postmarket safety activities (FAERS, surveillance, Sentinel)
- Non-GDUFA mandated process control documents (SOPs, MAPPs, Guidances)
- PET product review
- Citizen Petitions
- Non-action letters (acknowledgement, withdrawal, Dunningers)
- Triaging administrative amendments
- Annual Reports
- Orange Book

* Does not represent a complete inventory of OGD activities that are not associated with GDUFA goals.

Non-GDUFA activities*

- Guidance documents
 - General
 - Many Product-Specific Guidances (PSGs)
- Program analytics
- Media requests
- Congressional requests
- OIG audits/reports
- GAO studies/reports
- Legislative Proposal Technical Assistance
- Required staff training
- Presentations
(Internal and External)
- Peer-reviewed publications

CLOSING COMMENTS



US FDA Generic Drug Office Director Uhl Announces Retirement

17 Jul 2018 | ANALYSIS



by Derrick Gingery

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Executive Summary

Uhl, who shepherded OGD into the user fee era, will retire in February.

- OGD is a high functioning, high performing office
- OGD and the FDA's generic drug program are in excellent shape
 - Historically probably in the BEST place ever
- Reproducibly high volume and high quality output
- Robust processes allow for transparency to and predictability for industry
- Robust generic drug pipeline
- OGD Leadership at the Office and Division levels are fully capable to continue:
 - The momentum of this program
 - OGD's mission and vision
 - Accomplishment of great things
- Incredibly talented, knowledgeable and dedicated staff



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