Policy Update on Pharmaceutical Quality

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A complete list of COVID-19-related FDA guidance documents can be found at https://www.fda.gov/emergency-preparedness-and-response/coronavirus-disease-2019-covid-19/covid-19-related-guidance-documents-industry-fda-staff-and-other-stakeholders

Pharmaceutical Quality Related COVID-19 Guidances

Guidance for Industry

Manufacturing, Supply Chain, and Drug and Biological Product Inspections During COVID-19 Public Health Emergency (PHE) Questions and Answers

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/manufacturing-supply-chain-and-drug-and-biological-product-inspections-during-covid-19-public-health

Manufacturing, Supply Chain, Inspection

Guidance Content

- How FDA defines mission critical
- How FDA has been prioritizing inspections during the pandemic
- How FDA will prioritize inspections as travel restrictions are lifted

Manufacturing, Supply Chain, Inspection Guidance Content

- The alternative tools that the FDA has been using to assess facilities
- The impact of the pandemic on pending and approved applications
- How FDA ensures the quality of imported products while inspections are limited

Manufacturing, Supply Chain, Inspection Guidance Content

- FDA is using all available tools to assess sites named in pending applications and supplements
- Certain FDA inspections continue
- Applications will not automatically receive a Complete Response because of the need for an inspection that cannot be conducted due to travel restrictions
- Follow existing guidance for post-approval changes. For CMC supplements, if atypical or flexible strategies are being considered due to the COVID-19 pandemic, contact OPQ at CDER-OPQ-Inquiries@fda.hhs.gov

Review Timelines for Applicant Responses to Complete Response Letters When a Facility Assessment Is Needed During the COVID-19 Public Health Emergency Guidance for Industry

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/review-timelines-applicant-responses-complete-response-letters-when-facility-assessment-needed

Review Timeline Guidance Content

- Provides information on review timelines during the PHE for applicant responses to complete response (CR) letters when a facility assessment is necessary before FDA can take action on:
  - Original and supplemental abbreviated new drug applications (ANDAs)
  - Original and supplemental biologics license applications (BLAs)
  - Original and supplemental new drug applications (NDAs)

Guidance for Industry

Remote Interactive Evaluations of Drug Manufacturing and Bioresearch Monitoring Facilities During the COVID-19 Public Health Emergency Guidance for Industry

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/remote-interactive-evaluations-drug-manufacturing-and-bioresearch-monitoring-facilities-during-covid

Remote Interactive Evaluation Guidance Content

- Provides information about the use of remote interactive evaluations, such as live stream video, to examine facilities. For example:
  - How FDA selects and notifies a facility, including special considerations for different inspection programs
  - Preparing for a remote interactive evaluation
  - Conducting the evaluation, including the technological requirements and FDA's evaluation of documents and records
  - Communications between the FDA and firms on any observations

Remote Interactive Evaluation Guidance Content

- Voluntary
- Not considered an FDA inspection under section 510(h)(3) of the FD&C Act
- FDA uses risk management methods and tools to determine when to request a facility's participation in a remote interactive evaluation
- FDA may request records or request that a facility participate in a remote interactive evaluation prior to an inspection
- FDA will not accept requests from applicants or facilities for FDA to perform a remote interactive evaluation.

Guidance for Industry

COVID-19 Container Closure System and Component Changes: Glass Vials and Stoppers Guidance for Industry

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/covid-19-container-closure-system-and-component-changes-glass-vials-and-stoppers-guidance-industry

Container Closure System Guidance Content

Provides recommendations to holders of approved NDAs, BLAs, and ANDAs regarding the reporting and implementation of changes to container closure system (CCS) components consisting of glass vials and stoppers for approved sterile drug products, administered parenterally

Container Closure System Guidance Content

- Common CCS changes, recommendations on how each change should be reported per current guidance, and the information that should be provided to support the change
- Discusses risk-based tools available to facilitate the implementation of changes to CCSs consisting of glass vials and stoppers
- Comparability Protocols and other pathways available to application holders to obtain Agency feedback

Guidance for Industry

COVID-19: Potency Assay Considerations for Monoclonal Antibodies and Other Therapeutic Proteins Targeting SARS-CoV-2

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/covid-19-potency-assay-considerations-monoclonal-antibodies-and-other-therapeutic-proteins-targeting

Potency Assay Guidance Content

- Provides potency assay recommendations for monoclonal antibody and other therapeutic proteins designed to bind to viral receptors on host cells, inhibit viral entry, and/or elicit Fc-mediated effector function

- Includes recommendations for
  - Binding Assays
  - Viral Neutralization Assays
  - Fc-effector Function Assays

Guidance for Industry

Resuming Normal Drug and Biologics Manufacturing Operations During the COVID-19 Public Health Emergency

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/resuming-normal-drug-and-biologics-manufacturing-operations-during-covid-19-public-health-emergency

Resuming Manufacturing Guidance Content

Provides information to help drug and biological product manufacturers during the COVID-19 public health emergency plan and prioritize current good manufacturing practice (CGMP) activities as they transition from operations impacted by the public health emergency to normal manufacturing operations

Resuming Manufacturing Guidance Content

Describes how to evaluate and prioritize the remediation of CGMP activities that were necessarily delayed, reduced, or otherwise modified during the public health emergency in order to maintain production and the drug supply

Guidance for Industry

Good Manufacturing Practice Considerations for Responding to COVID-19 Infection in Employees in Drug and Biological Products Manufacturing

https://www.fda.gov/regulatory-information/search-fda-guidance-documents/good-manufacturing-practice-considerations-responding-covid-19-infection-employees-drug-and

CGMP and Infections in Employees Guidance Content

- Provides recommendations to drug and biological product manufacturers regarding:
  - Manufacturing controls to prevent contamination of drugs
  - Risk assessment of SARS-CoV-2 as it relates to drug safety or quality
  - Continuity of manufacturing operations

Examples of Other FDA Guidance Topics Related to Pharmaceutical Quality during the PHE

- Hand Sanitizers
- Compounding
- Impact on Formal Meetings with FDA
- Impact on Product Development and Applications

Other (non COVID-19) Pharmaceutical Quality Policy Updates

Negotiations

GDUFA

PDUFA

BsUFA

Guidance Documents

- Development and Submission of Near Infrared Analytical Procedures (FINAL)
- Field Alert Report Submission: Questions and Answers Guidance for Industry (FINAL)
- Oral Drug Products Administered Via Enteral Feeding Tube: In Vitro Testing and Labeling Recommendations (DRAFT)
- Control of Nitrosamine Impurities in Human Drugs: Guidance for Industry (FINAL)

Guidance Documents

- Q12 Technical and Regulatory Considerations for Pharmaceutical Product Lifecycle Management Guidance for Industry (FINAL)
- ICH Q12: Implementation Considerations for FDA-Regulated Products (DRAFT)
- The Use of Physiologically Based Pharmacokinetic Analyses — Biopharmaceutics Applications for Oral Drug Product Development, Manufacturing Changes, and Controls (DRAFT)
- Questions and Answers on Quality Related Controlled Correspondence Guidance for Industry (DRAFT)

Compliance Programs and Standard (External) MAPPs

- Compliance Program 7356.002M: Surveillance Inspections of Protein Drug Substance Facilities

- MAPP 5021.2 Evaluating Color Additives and Flavors Intended for Oral Drug Products Submitted or Referenced in INDs and NDAs

Challenge Question #1

Which of the following is/are **true** regarding remote interactive evaluations (RIEs)?

A. RIEs are considered an FDA inspection

B. You should contact the FDA to request an RIE

C. FDA may request records or request that a facility participate in a remote interactive evaluation prior to an inspection

D. RIEs are mandatory

Challenge Question #2

Which of the following is/are **true** during the public health emergency?

A. All FDA inspections have stopped

B. My pending application will automatically receive a Complete Response because the FDA cannot conduct an inspection.

C. I should follow existing guidance for post-approval changes. Atypical or flexible strategies can be considered due to the COVID-19 pandemic.

D. All of the above