

# Emerging Technology Program

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# Introduction to Pharmaceutical Quality



A quality product of any kind consistently meets the expectations of the user – drugs are no different.

Patients expect safe and effective medicine with every dose they take.

Pharmaceutical quality is assuring *every* dose is safe and effective, free of contamination and defects.

It is what gives patients confidence in their next dose of medicine.

#### About the Emerging Technology Program





Encourage and support the adoption of innovative technology to modernize pharmaceutical development and manufacturing through close collaboration with industry and other relevant stakeholders





A small cross-functional Emerging Technology Team (ETT) of 20-30 members, with representation from all relevant FDA quality review and inspection programs

#### Team members come from:

Office of Pharmaceutical Quality (OPQ)
Office of Compliance (OC)
Office of Regulatory Affairs (ORA)

Chair	Joel Welch
Vice Chair	Tom O'Connor
Project Manager	Elisa Nickum
Senior Scientific Advisor	Sau (Larry) Lee



#### **Program Objectives**

To provide a forum for firms to engage in early dialogue with FDA to support innovation

To engage international regulatory agencies to share learnings and approaches

To facilitate
knowledge transfer to
relevant CDER and
ORA review and
inspection programs















To serve as a centralized location for external inquiries on novel technologies

To ensure consistency, continuity, and predictability in review and inspection

To identify and evaluate potential roadblocks relating to existing guidance, policy, or practice

To help
establish
scientific
standards and
policy, as
needed

# ETP Lifecycle at a Glance



**ETP Collaborative Approach** 

Over the course of the ETP Technology Lifecycle, the Emerging Technology Team may employ a combination of collaborative approaches to engage with the technology.



The same Emerging Technology Team representative(s) will be involved in the entire process.



The composition of a review team will likely remain the same throughout the entire process.

Early Engagement

Pre-Approval Inspection

Collaborative Te

Emerging
Technology
Site Visit

Integrated
Quality
Assessment



#### **ETP Collaborative Approach**



#### Early Engagement (Pre-submission)

 Meeting(s) with the Emerging Technology Team (ETT) provide upfront scientific input under the Emerging Technology Program

#### **Emerging Technology Site Visit**

 Participation by OPQ (including the ETT member(s)) and/or ORA members

#### Integrated Quality Assessment (IQA)

- Interdisciplinary team with experts in Drug Substance, Drug Product, Process/Facility, Biopharm, and/or Inspection
- ETT member as an Application Technical Lead (ATL) or co-ATL to lead the IQA team when the ET impacts most parts of a CMC section

#### Pre-Approval Inspection (PAI/PLI)

 Conducted by team members from OPQ (including the ETT Member(s)) and ORA



#### Lifecycle of an ETP Technology

Industry Develops
Emerging
Technology



ETP Evaluates Technology



Technology Moves to Standard Quality Assessment Processes

Industry requests input and feedback on an emerging technology while preparing a regulatory submission

ETP works with industry to discuss, identify, and resolve technical and regulatory issues related to the development and implementation of the novel technology Technology is no longer considered "emerging" and passes through the standard quality assessment pathways

<sup>\*</sup>A technology is eligible to graduate from ETP when at least three applications have been received from three unique companies. Meeting this threshold does not automatically initiate graduation.



#### **Graduation Definition**

# An emerging technology qualifies for graduation and is no longer considered emerging within ETP when:



FDA has gained sufficient experience with the technology



The technology can proceed fully through the standard assessment process with no or minimal support from ETT members



#### **Graduation Benefits**



Graduation indicates that FDA has gained sufficient experience with the graduating technology and is confident in the ability of industry to submit successful future applications



By transferring responsibility for the graduated technology to other FDA offices, ETP has the capacity to accept future emerging technologies to keep pace with industry innovation



With more assessors trained to review the graduated technology, FDA can review more applications while continuing to meet the user fee goal dates.

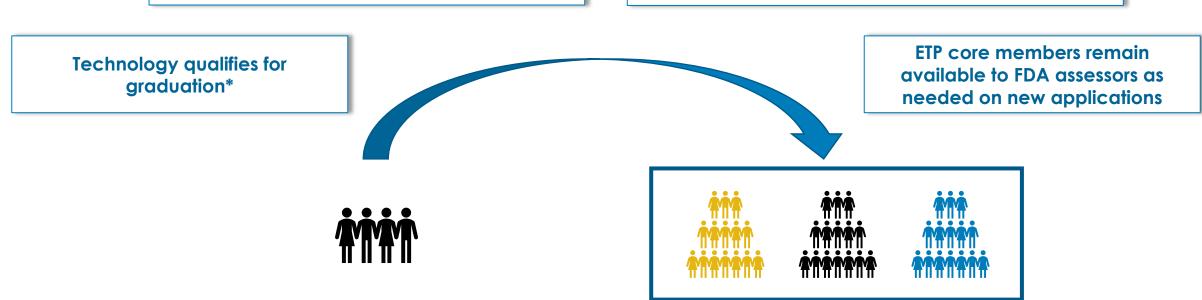
ETP core members remain available to FDA assessors as needed on regulatory submissions of graduated technologies.



#### **ETP Transfers Review Responsibility**

ETP determines technology's readiness to move forward with graduation

ETP manages knowledge transfer related to the technology and trains FDA assessors to be prepared to review future application submissions



Emerging Technology Program

FDA assessors review future applications from a graduated technology

<sup>\*</sup>A technology is eligible to graduate from ETP when at least three applications have been received from three unique companies. Meeting this threshold does not automatically initiate graduation.

#### Engaging with the Emerging Technology Program



#### How to Apply to ETP

01

Start early in development (even potentially without a drug candidate identified) 02

Follow procedures described in the ETT guidance found on our website to request participation in the ETP

03

Develop proposal

- Describe the technology and explain why it is novel or unique
- Describe how it improves products
- Summarize development plan and implementation roadblocks
- Describe submission timeline

The sponsor must justify how the proposed emerging technology meet two criteria:

- (1) Pharmaceutical Novelty
- (2) Product Quality Advancement

<sup>\*</sup> More detail can be found at:



#### **Engaging with ETP: FAQs**

#### Who can participate in the Emerging Technology Program?

ETP is open to companies that intend to include a novel technology as part of a regulatory submission reviewed by the Center for Drug Evaluation and Research (CDER).

# Does the submitter of a proposal need to wait until a molecule is identified before joining ETP?

The group can join ETP before a molecule is identified as long as the technology used meets the criteria for acceptance.

# Does the submitter of a proposal need to wait until a regulatory submission (e.g., an IND) is intended to join ETP?

The group can join ETP before a submission is intended.



#### **Engaging with ETP: FAQs**

# What if the submitter of a proposal is still developing a particular technology and still determining what questions to ask. Should they wait to submit a proposal?

Waiting is not needed as the ETP engagement is not designed to be a single interaction. Rather, it's ideally a series of engagements throughout technology development.

# How will the ETP be notified of an emerging technology within a regulatory submission?

If the technology in the application is part of a previous engagement, the ETT will be included in future interactions. It is helpful to reference the acceptance into the ETP in the cover letter of the submission and to notify the ETP mailbox upon submission.



#### **Engaging with ETP: FAQs**

### Are new proposals appropriate for legacy products or only for new molecules in development?

Proposals are appropriate for new molecules in development as well as products that have been on the market for a long time. Proposals are appropriate for any type of molecule.

#### What is the criteria to be accepted into the ETP?

Acceptance is not guaranteed.

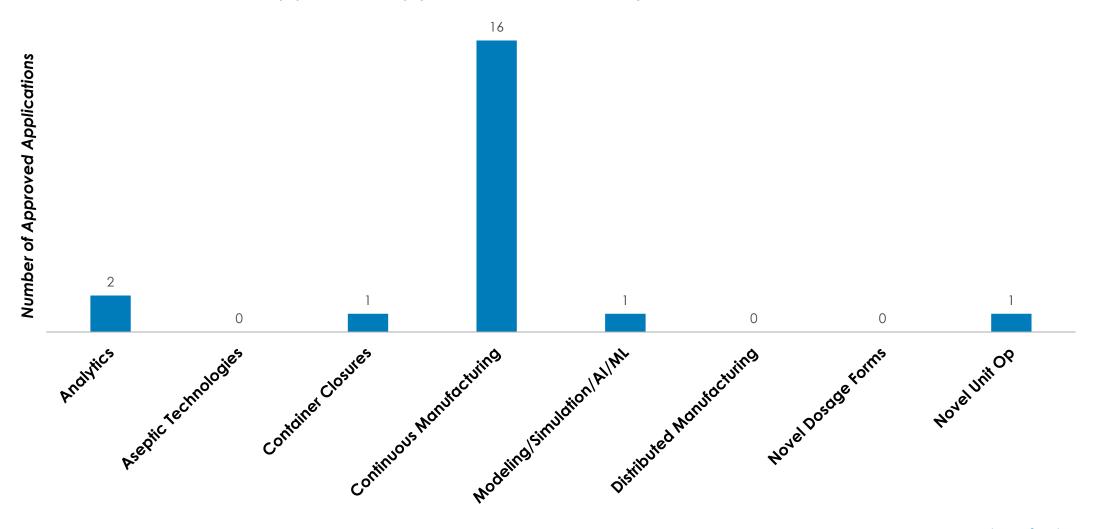
The ETT limits acceptance into the program to technologies that are likely to advance product design or modernize pharmaceutical manufacturing, and with which the Agency has limited prior experience and knowledge.

The proposed technology in the planned submission must have the potential to improve product safety, identity, strength, quality, or purity.



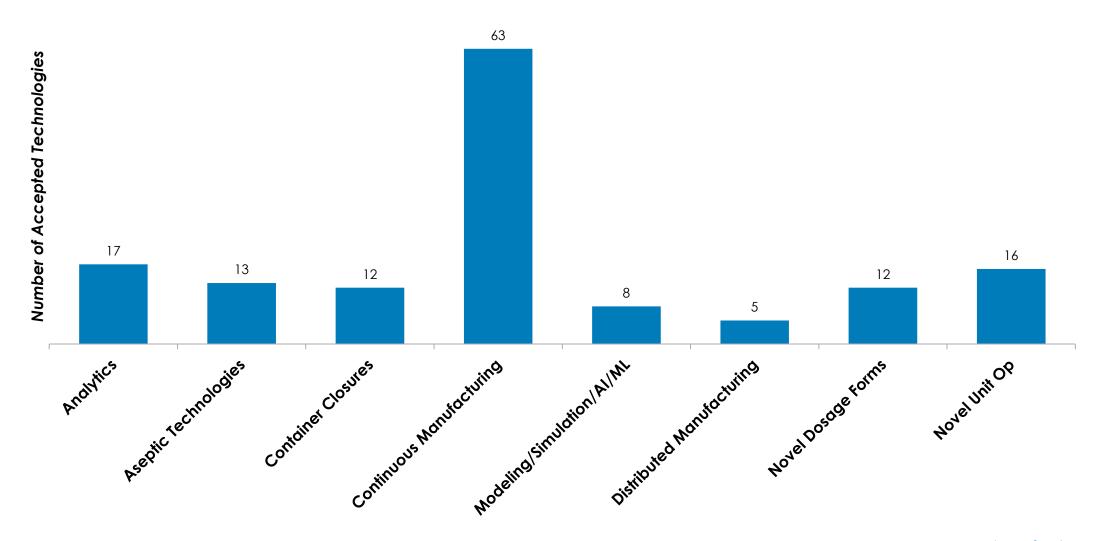
#### **Approved Application Technologies**

There have been 21 approved applications since July 2015.



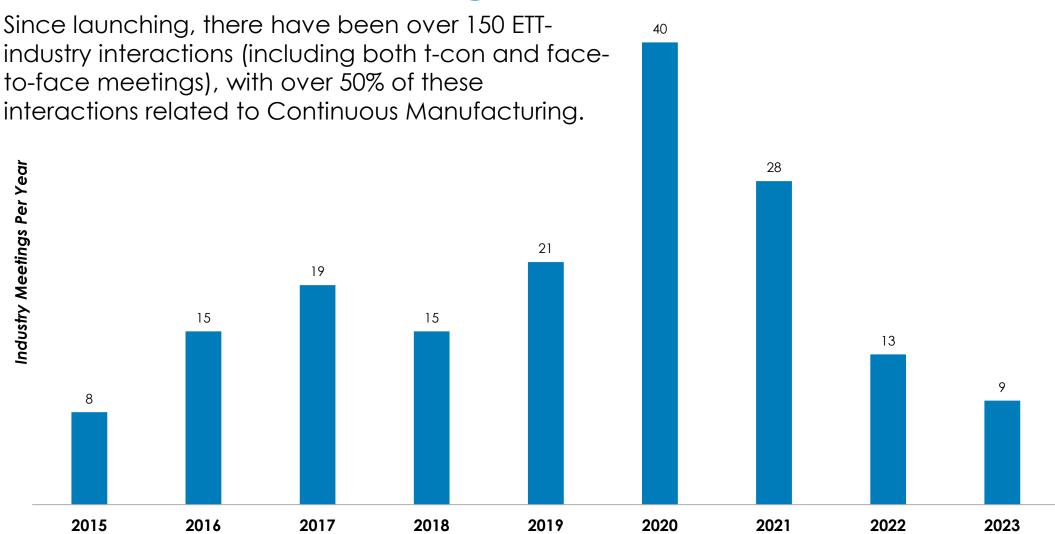


#### ETP Accepted Submissions by Technology





#### **Accepted Meeting Requests**





#### Conclusion

- > The Emerging Technology Program serves as a centralized location for external inquiries on novel technologies, providing a forum for industry to engage in early dialogue with CDER/FDA.
- Through this early engagement, the ETP can identify and evaluate potential roadblocks relating to existing guidance, policy, or practice.
- > Once FDA has enough confidence in industry's ability to successfully submit applications using the technology, it then "graduates" from the ETP.
- To request participation in the ETP, develop a proposal and be sure to:
  Describe the technology, explain why it is novel, and how it improves products
  Summarize development plan and implementation roadblocks

  - Describe submission timeline

Additional procedures are described in the ETT guidance found on our website: <a href="https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/how-participate-etp">https://www.fda.gov/about-fda/center-drug-evaluation-and-research-cder/how-participate-etp</a>

