

# *Clinical Relevance*

## *Seeing the Big Picture*

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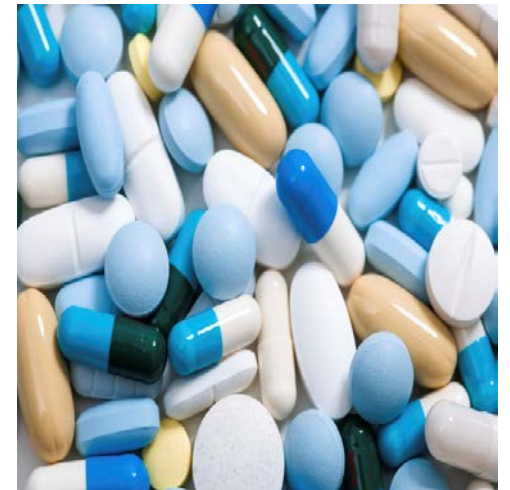
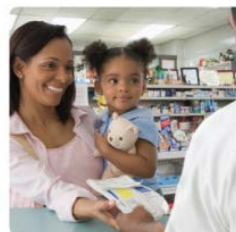
# CDER's Office of Pharmaceutical Quality (OPQ)

January 11, 2015

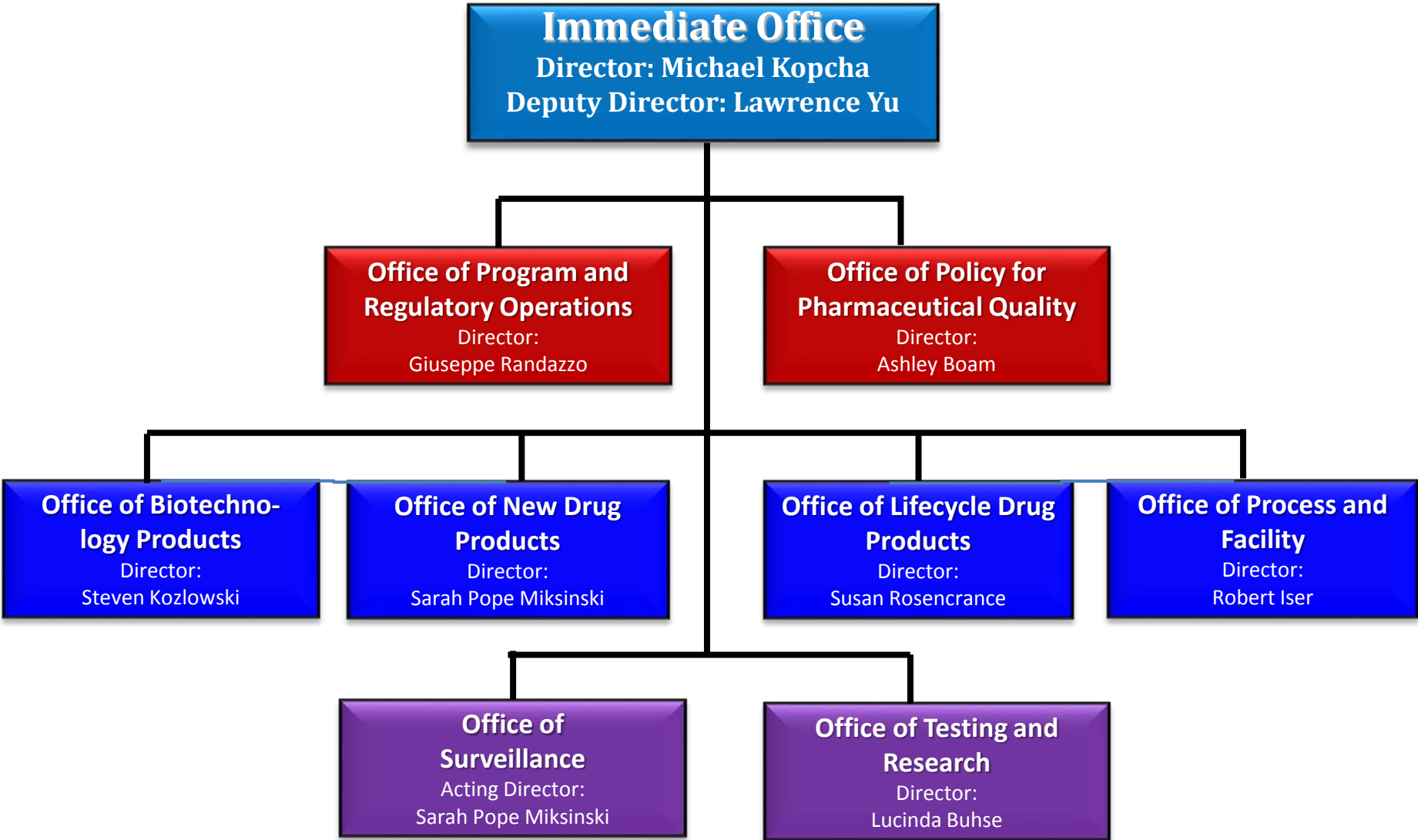
Advances FDA's Quality Initiative to the next level



The link to the patient/consumer...

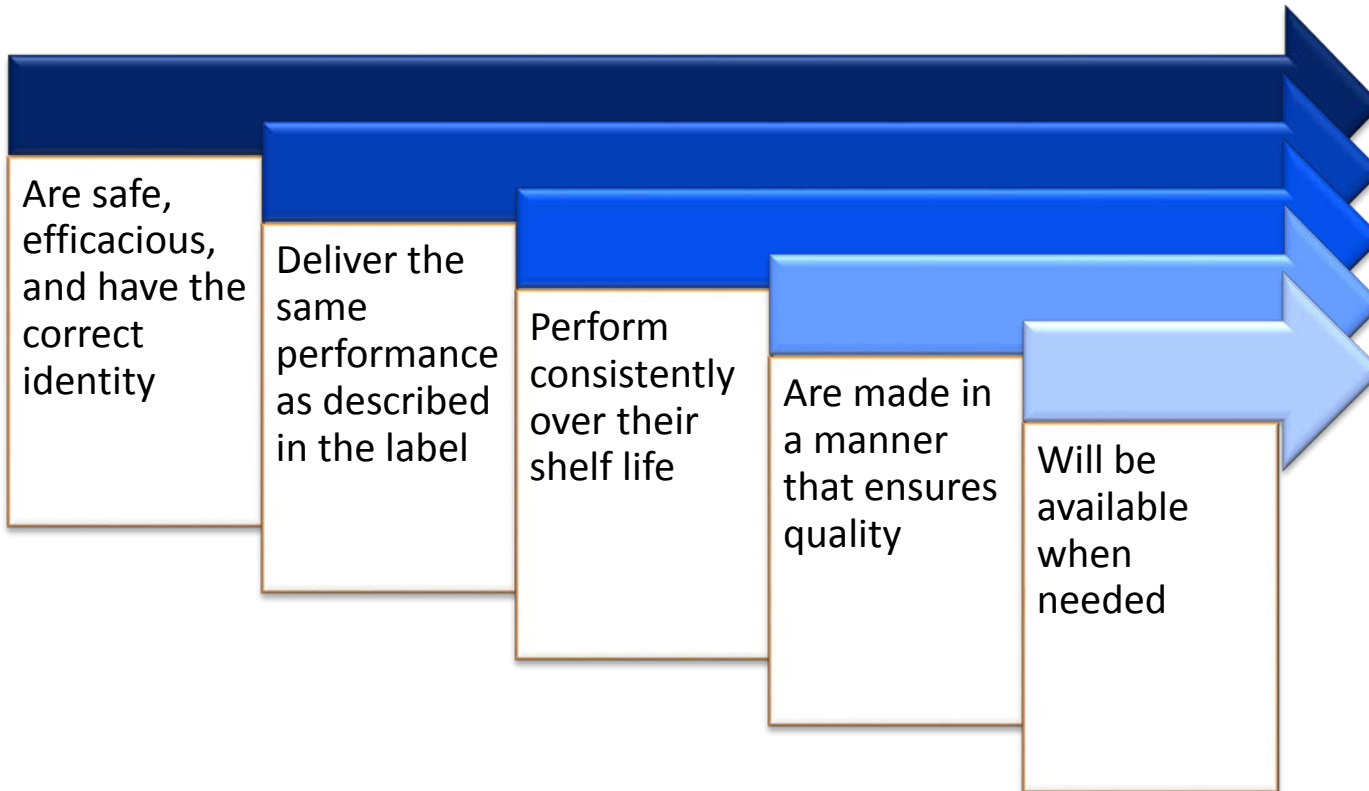


# Office of Pharmaceutical Quality



# Expectations for Quality

Patients and caregivers assume that their drugs:



## Clinical Relevance

- Product quality is the foundation upon which the clinical safety and efficacy assessment rests
- A product is “fit for use” if it meets the established quality attributes
  - purity, potency/strength, identity, bioavailability/delivery, labeling/packaging, performance, etc.
- Strive to establish appropriate correlations between quality attributes and clinical performance

# Applying Clinical Relevance to Quality

- A high quality drug product is a product that reproducibly delivers the therapeutic benefit to the patient/consumer as stated in the label, is free of defects, and presents no undeclared risk (e.g., is not contaminated)
- **Attributes**
  - Beginning with the end in mind – designing the product to meet patients’ needs and the intended product performance
  - Developing the Quality Target Product Profile (QTPP)
    - A prospective summary of the quality characteristics of a drug product that ideally will be achieved to ensure the desired quality, taking into account safety and efficacy of the drug product (ICH Q8 (R2))
  - Identifying “clinically relevant” CQAs – those characteristics having an impact on product quality
- **Specifications**, such as:
  - Dissolution, Impurities, Size/Shape/Delivery/Design

# Clinical Relevance - The Continuing Dialog

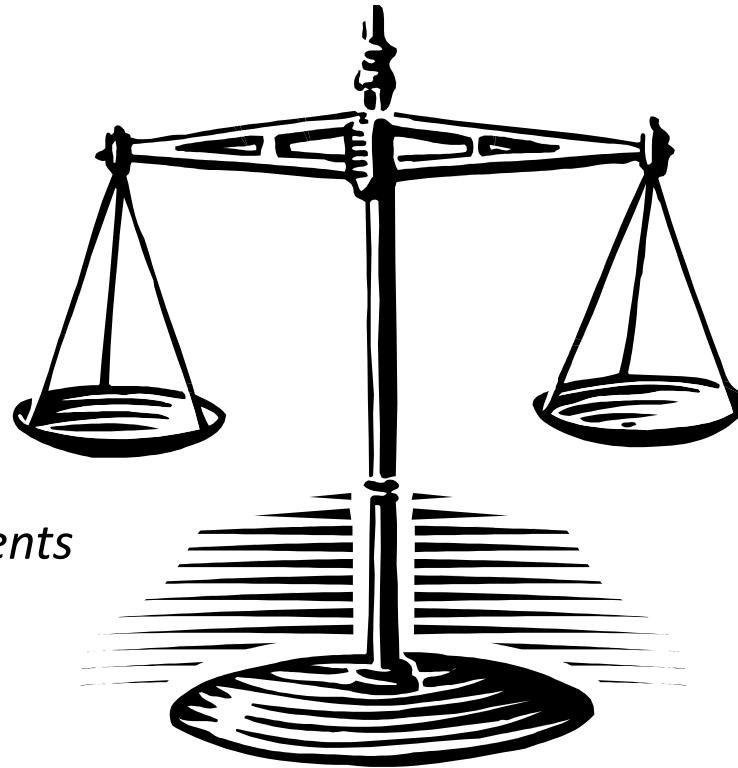
- How much is enough?
- Need to know vs want to know
- Risk communication
- Uncertainty/Risk-Informed
- Multidisciplinary interactions
- Efficiency of interactions/discussions
- Stakeholder feedback
- Timeframes (including expedited)
- Seeing the “big picture”



## Clinical Relevance – Specific Discussions

- Clinically relevant specifications
  - Impurities
  - Dissolution, IVRT
  - ...
- Emerging technologies
- Effective risk communication
- Policy/guidance development
- Benefit-Risk
- Breakthrough Therapies
- ...

# The Risk/Benefit Balance...



*Availability to patients*

*Risks to Quality*

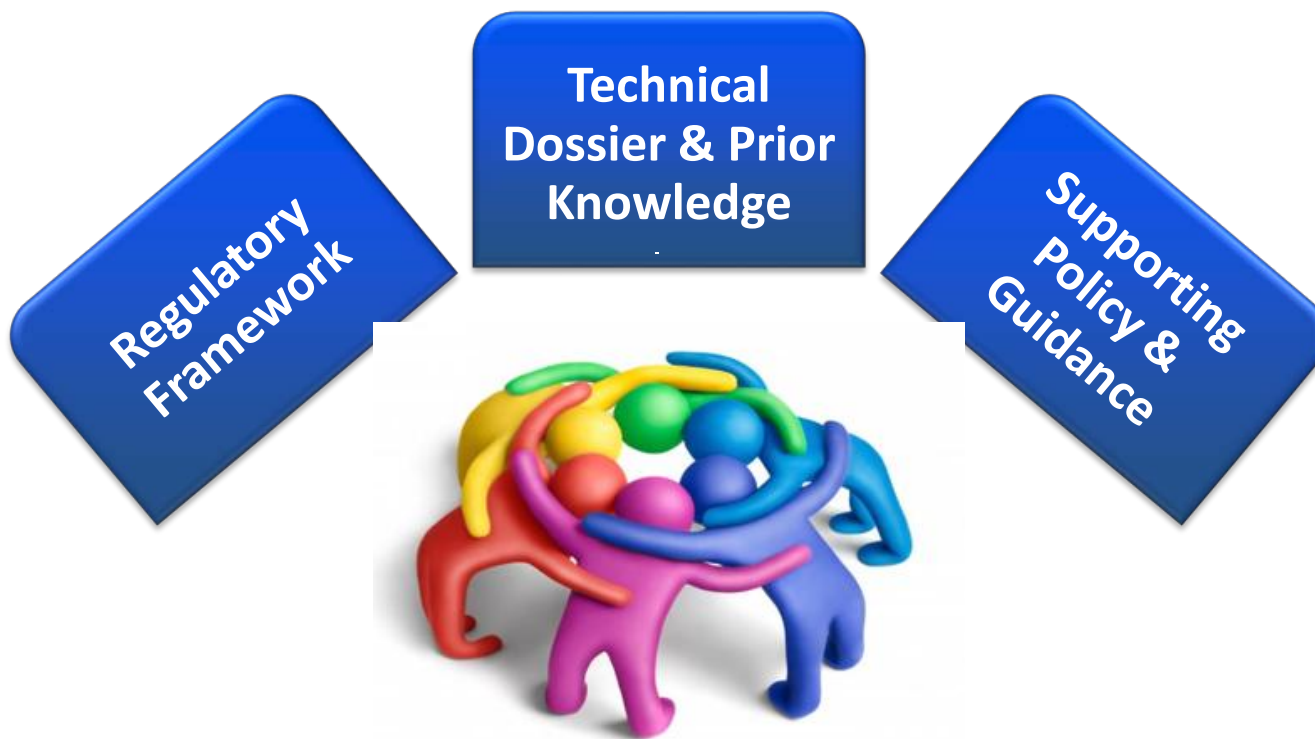
## Clinical Relevance – Context

- Clinical relevance is not only about clinical data
  - Patient/consumer-focused
  - Links quality to clinical performance
  - Involves pertinent multidisciplinary data/dialog
  - Helps to ensure that drug products will perform as indicated in the label
- Clinical relevance is more than specifications
  - More than dissolution or IVIVC
  - CRS are just part of clinical relevance
  - Clinical relevance is not owned by a single discipline
  - Not a “cookie-cutter” approach

## Clinical Relevance – Connections

- Clinical relevance is just as much about what we don't know vs what we do know
  - Risk involves uncertainty
  - Need to know vs want to know in our communication to stakeholders
  - Timely engagement of internal and external stakeholders
- Clinical relevance is a balanced conversation
  - Not a “magic bullet”
  - Balanced within quality, multidisciplinary, and/or Agency/industry

# A Balanced Conversation



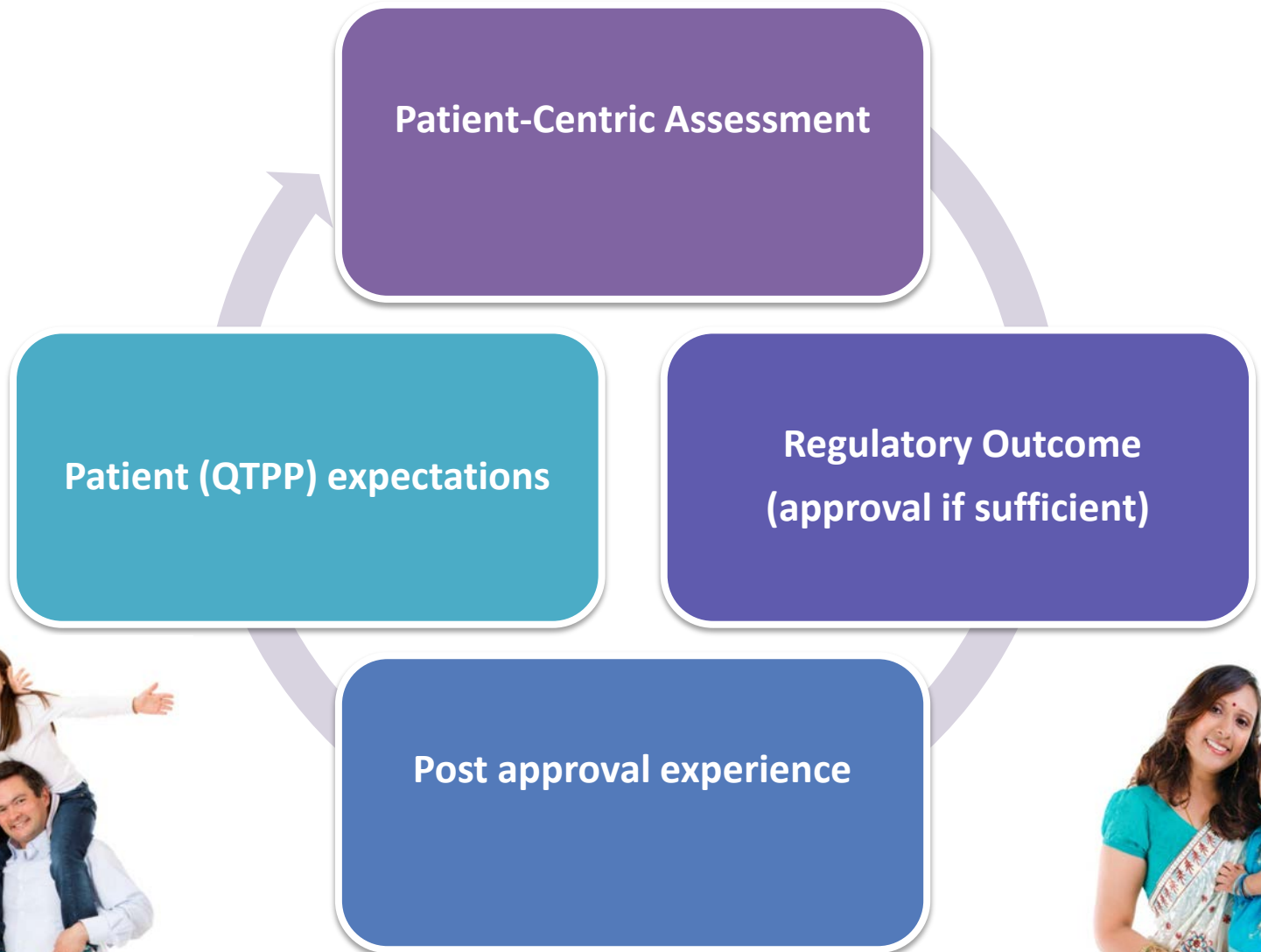
## Clinical Relevance – Collaboration

- Clinical relevance is just as much about HOW we work vs WHAT we do
  - More than a single discipline/not owned by any single discipline
  - Based on robust internal/external discussions and solid collaboration
  - Based on concept of building mutual understanding and benefit/risk-based decision making
  - Striving to identify potential efficiencies and continuous improvement

## ONDP Strategic Priorities (2016-21)

- Enhance the team-based review process
- Proactively support continuous improvement – review quality
- Proactively support continuous improvement – review efficiency
- Facilitate effective, transparent and risk-based communication
- Enhance robust discussions linking quality to clinical performance
- Achieve excellence through a skilled, knowledgeable and collaborative workforce

# Clinical Relevance - A Lifecycle Approach





## Moving Forward...

- Our primary stakeholder – the patient/consumer
- Supporting OPQ organizational constructs and initiatives
- Various objectives in 2017 heavily support clinical relevance, effective risk communication, and enhanced collaboration/integration
- Additional opportunities may exist to align objectives with meaningful outcomes for industry
- Appropriate context, robust connections, and effective collaboration are crucial to progress



*Thank You!*