



Regulatory Intelligence

Meredith Brown-Tuttle, RAC
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Overview

- ◆ What is Regulatory Intelligence
- ◆ Components of Regulatory Intelligence
 - Regulatory research
 - Outsourcing regulatory intelligence/research
 - Self-guided research/information databases
 - On-going surveillance
- ◆ Examples of Regulatory Intelligence Output
- ◆ Implementing the Regulatory Intelligence department

What is Regulatory Intelligence?

“Act of gathering and analyzing regulatory information and monitoring current regulatory climate ...”

... and using this data to generate creative and innovative regulatory strategies designed to obtain and maintain product approvals in a timely and efficient manner.

Regulatory Intelligence

- ◆ RI allows a regulatory professional to
 - Create a strategy for a product,
 - Create a development plan for product,
 - Research past precedence and adjust for current regulatory climate,
 - Advise personnel,
 - Write or construct a marketing application incorporating all Agency requirements and
 - Adjust marketing application to ROW needs

What is Regulatory Strategy

- ◆ The *Merriam-Webster Medical Dictionary*(2002) defines it as: an adaptation or complex of adaptations (as of behavior, metabolism, or structure) that serves or appears to serve an important function in achieving evolutionary success.
- ◆ Regulatory strategy could be seen as the adaptations a company makes to move its product from the development state to achieving marketing approval.
- ◆ Regulatory strategy incorporates the drug development plan, an outstanding issue or question, background information, regulations and/or guidance documents, strategic advice and recommendations on implementation.

Why is Regulatory Intelligence Important?

- ◆ Provides the regulatory professional with information to:
 - Identify opportunities
 - broader indications, precise pre-clinical /clinical development programs
 - Possible pitfalls
 - Compliance issues, change in requirements for specific indication
 - Predict review times for product and/or change to product
 - Answer specific development questions poised by team

Benefits of Regulatory Intelligence

- ◆ Increase compliance
- ◆ Increase likelihood of marketing application approval
- ◆ Increased efficiency of planning and executing development plan

Drug, Biologic or Device, How Source of RI Differ

- ◆ Sources of information differ
- ◆ Surveillance resources differ
- ◆ Consultants used differ
- ◆ Analysis of information is similar

Goal the same = approval of marketing applications

More than Regulations and Guidance Documents

- ◆ Regulations and guidance documents tell ½ the story.
- ◆ These sources describe the black and white story ... most of regulatory is gray!

Sources of Regulatory Intelligence

◆ Common:

- Regulations
- Guidance Documents
- Panel Meetings
- Previous approvals

◆ Less common

- Interactions with reviewers
- Warning Letters/Untitled Letters
- Interactions with other regulatory professionals
- FDA presentations
- Competitor information
- FOI requests

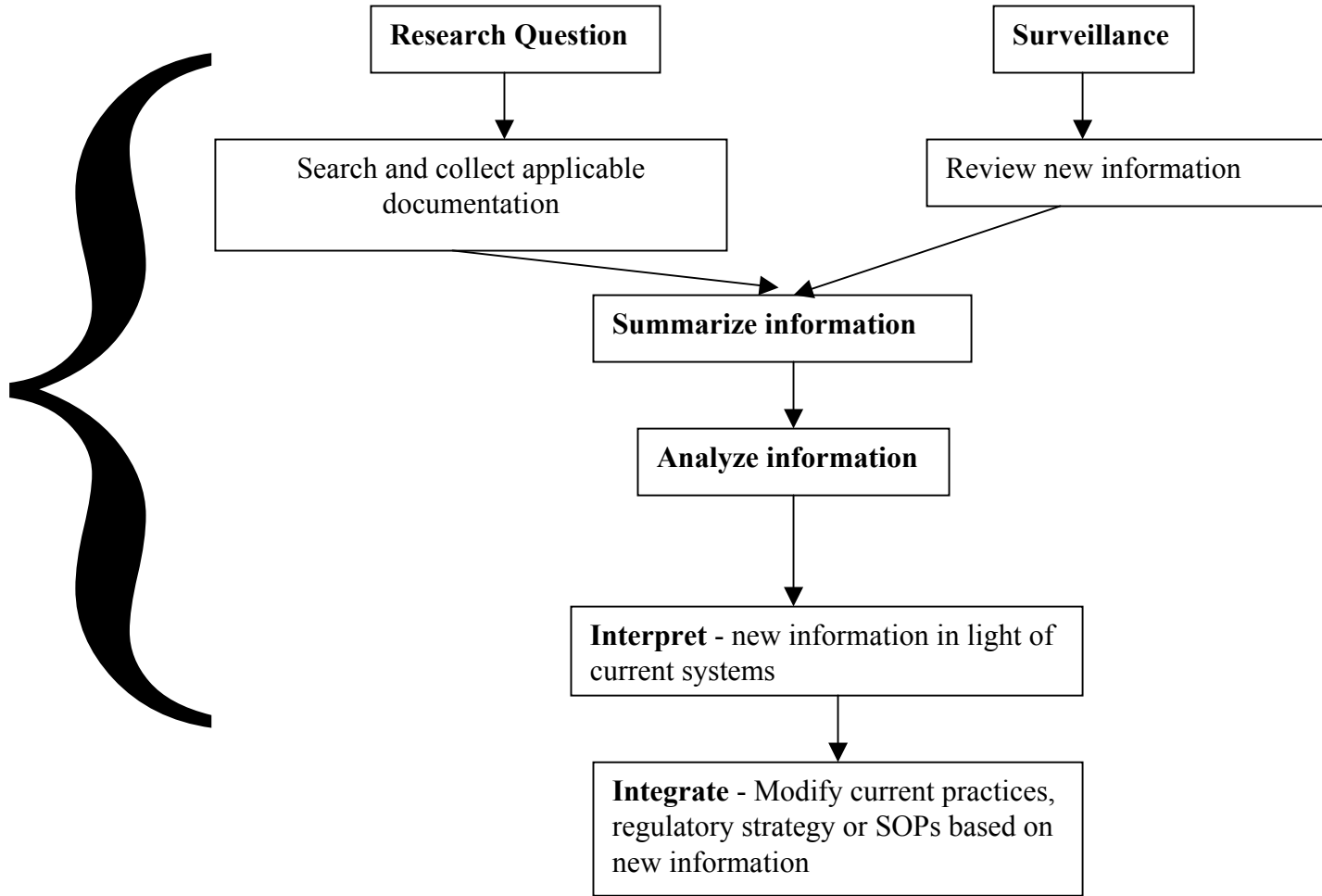
Regulatory Intelligence Options

RI can be:

- ◆ Self-directed
 - Websites
 - Information services/regulatory databases
- ◆ Resourced Out
 - Consultants
 - Information databases
- ◆ An internal department to specifically perform this function

Regulatory Intelligence Overview

Regulatory Intelligence



Surveillance

- ◆ Surveillance comprises:
 - What is surveillance
 - How to conduct surveillance
 - When to conduct surveillance
 - Outcomes of surveillance

What is Surveillance

Worldwide monitoring of regulatory information looking for changes in the in the regulatory landscape

How to Conduct Surveillance

- ◆ Employ a regulatory information database
- ◆ Monitor applicable regulatory websites
- ◆ Get daily e-mails from:
 - Regulatory websites
 - Commercial information provider websites
- ◆ Attend professional/advisory meetings
- ◆ Talk to colleagues and/or consultants

Surveillance Intervals

◆ Periodic surveillance

- Conducted only when a question comes up
- Available resources to do continual surveillance might be limited
- Topics of interest might be missed depending on timeframes between surveillance

◆ On-going surveillance

- Issues tend not to be missed
- Can employ a database to conduct continual surveillance (can use key-word searches)

Surveillance Outcomes

- ◆ Impact on development program or approved products
 - Summarize new information - if applicable to program
 - Analyze for impact on current program/product
 - Provide information to team members information impacts or whole development/marketing team
 - Develop strategy based on new information
 - Implement strategy by integrating new information into development/product program or provide justification for not integrating information
- ◆ No impact on current program or product
 - Keep in library for future reference
 - Do not store information (example a drug company does not summarize or analyze biologic specific information)

Regulatory Information Databases

- ◆ Provide worldwide regulatory information (over 55+ countries)
- ◆ Explanatory documents that guide you through a country's drug/device registration process
- ◆ Provide the ability to conduct focused research and surveillance, some summarizing and integration
- ◆ Provide daily or weekly updates
- ◆ Information structured logically by subject matter
- ◆ Key word or full text searches by country of choice (not dependant on the finicky search engines supplied by global regulatory agencies)
- ◆ Information can be bookmarked (so you can review it later)
- ◆ Print off requested documents for archival purposes
- ◆ Access to current, revoked and draft documentation/information

Regulatory Information Databases

- ◆ Some provide limited analysis of documents
- ◆ Still need to do analysis of information and impact to current program/product
- ◆ Allow for integration of regulations into SOPs
- ◆ E-mail updates of regulatory agency activities (daily, weekly, or monthly)
- ◆ Downloadable forms – country specific
- ◆ Information is available in one place (no need to travel to multiple websites)
- ◆ Ability to e-mail (via cut and paste) or provide links to the various regulations
- ◆ Link regulations to internal Standard Operating Procedures (SOP)
- ◆ Can maintain competitive intelligence information/add to database

Regulatory Information Databases

www.tarius.com

www.idrac.com

www.mediregs.com

Consultants

- ◆ Need to be clear about question asking
- ◆ Need to be upfront about format expect information in
- ◆ Need to give time limit or spending cap to answer question
- ◆ Realize that one question might bring up other questions

REGULATORY STRATEGY

Type: Drug/Device combination

Drug: Hydromorphone hydrochloride

Device: Transdermal patch with electrical components

Indication: Management of chronic pain

Claimed effect (proposed): Management of moderate to severe chronic pain due to malignant conditions

Principal Mechanism of Action: Pharmacologic

Question: Will this drug/device be regulated as a drug or device or combination product in Canada?

SUMMARY

Background and Definitions

- Health Canada defines a combination product as “a therapeutic product that combines a drug component and a device component, such that the distinctive nature of the drug component and device component is integrated in a singular product.” Within this definition, “drug” refers to both drug and biologic products.
- Where the principal mechanism of action by which the claimed effect or purpose is achieved by **pharmacological**, immunological, or metabolic means, the combination product will be subject to the *Food and Drug Regulations*, unless that action occurs in vitro, without reintroducing a modified cellular substance to the patient, in which case the product will be subject to the *Medical Devices Regulations*.¹
- **Pharmacological** is understood as an interaction between the molecules of the substance in question and a cellular constituent, usually referred to as a receptor, which either results in a direct response, or which blocks the response to another agent and, for the purposes of this policy, includes anti-infective activity.²
- The Combination Product policy does not apply to combinations of drugs and medical devices where the drug component and the device component can be used separately (e.g., products sold together in procedure packages and trays). The *Food and Drug Regulations* shall apply to the drug component of such a product and the *Medical Devices Regulations* shall apply to the device component.²

Assumptions

- Put in assumptions about drug and device

Strategic Advice

- The primary mechanism of action is due to the pharmacological means; therefore, in Canada, this will be regulated as a drug combination product and subject to the *Food and Drug Regulations*.

Recommendation

- Example: File a Clinical Trials Application for a drug

References: 1 Drug and Medical Device Combination Product Decisions, June 7, 1999
2 Drug/Medical Device Combination Products, June 12, 1997, revised May 1999

Signature:

Date:

Why Document Regulatory Intelligence

- ◆ Constructing or documenting a formal written analysis of the regulatory strategy for personal use or presentation to the team allows future reference to determine why a decision was made at a particular time in the drug development timeline.
- ◆ In addition, it can serve as the foundation document for any future updates and analysis, as needed for that topic.

Creating the Regulatory Intelligence Department

- ◆ Identify key person with excellent research skills
- ◆ Identify which issues/topics will be monitored on an on-going basis
- ◆ Identify which countries will be monitored
- ◆ Identify key information or topics needed by country
- ◆ Identify storage media for incoming information (paper or electronic)

Creating the Regulatory Intelligence Department

- ◆ Identify what research tools will be used (databases, websites, consultants, etc.)
- ◆ Identify who will conduct the analysis and what level of detail will it contain
- ◆ Identify the process of communicating information to the end user
- ◆ Identify the process of how new information will be evaluated against prior information
- ◆ Identify the process by which new information will be integrated into current processes

Acquiring and maintaining
Regulatory Intelligence is the
most important activity to a
successful regulatory
department!