# **Understanding the Drug Approval Process**

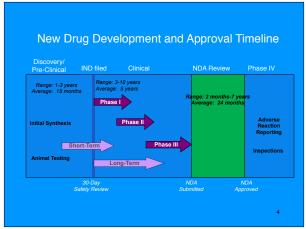
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#### **Understanding the Drug Approval Process**

- For each of the following be able to give a brief description
  - Discovery
  - · Phase I
  - · Phase II
  - · Phase III
  - · NDA submission and Approval
  - Phase IV Post-Marketing
  - ANDA

# The Drug Approval Process

- All new drugs require FDA approval prior to marketing.
- Proof that the drug is SAFE & EFFECTIVE and its benefits outweigh its risks.
- The burden of proof is on the manufacturer NOT the FDA.



#### **Testing Phases**

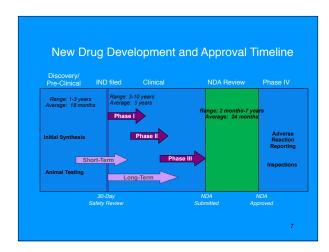


- Drug Discovery
  - Synthesis Screening
  - Begins in the laboratory for chemical analysis.
- · Pre-Clinical Animal testing
  - Use animals and treat them as humanly as possible.
  - Test using different species.
  - Only a fraction of the drugs tested on animals reach clinical trials stage.

# **New Drug Approval Process**

If Drug Discovery and Animal testing are successful:

- An Investigational New Drug Application (IND) is filed with the FDA by the manufacturer.
- The **IND** contains current findings and justification to move studies into humans.



#### Phase I

- Objectives
  - Initiate human experience
  - Assess acute tolerability and laboratory safety
  - Define the drug's behavior in man
  - Assess early proof of concept

### **New Drug Approval Process**

#### **Clinical trials with humans**

- INFORMED CONSENT is required for each patient/subject before enrolling into clinical trials.
- Requires for the patient to be told all the risks and other treatment options in a language they understand.
- Patients should also be free to leave the trial at any time.

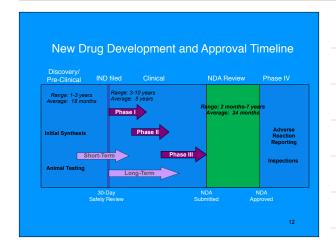
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#### Phase I

- Generally healthy male volunteers
- Subjects studied <100</li>
- Usually blinded and placebo controlled
  - Inactive substance: not real medicine administered
  - Gives the impression that they're receiving the real medicine.
  - Used to compare against patients with the test drugs

#### Phase I

- Duration ~12 month
- About 2/3 go on to Phase II
- · Less than ¼ will reach market
- Reasons for stopping
  - Safety
  - Intolerability
  - Poor bioavailability
  - Formulation issues



# Phase II

- Objectives
  - Establish early evidence of safety
  - Establish proof of concept
  - Narrow dose range
  - Up to several hundred patients.
  - Several months to two years.

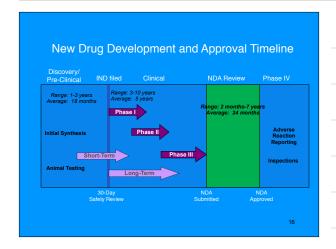
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#### Phase II

- Study Population
  - Target disease state
  - Tightly controlled patient selection
- Studies are comparative

#### Phase II

- Duration 18 30 months
- Risk
  - Progression to Phase III 41%
  - Progression to launch 33%
- Reasons for Failure
  - Toxicity
  - Lack of efficacy



#### Phase III

- Objectives
  - Unequivocal demonstration of efficacy and safety for the desired indication(s) at a specific dose.
    - Safety
    - Dosage
    - · Effectiveness.

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#### Phase III

- Controlled Trial
  - Group of patients (with similar condition or disease) who are given a placebo (or no drug) and used to compare the effect of the test drug.
  - Groups are placed on controlled or treatment arm randomly.
- Double-Blind Trial
  - The patient nor the doctor who is treating the patient knows in which arm of the study a particular patient is.

### Phase III

- Study Population
  - Target disease state
  - Reduce exclusion criteria
  - 100s to 1,000s of patients studied
- Studies are conducted at multiple locations in multiple countries
- Data are pooled across treatment centers

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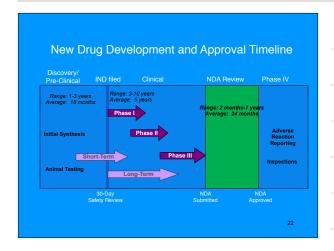
### Phase III

- Duration 2 3+ years
- Risk
  - Progression to NDA submission 79%
  - Progression to launch 65 71%
- Reasons for Failure
  - Economics
  - Efficacy
  - Safety

# New Drug Application (NDA)

#### NDA

 Once proven safe and effective in the manufacturer's view, they may submit an NDA seeking approval to market the product.



#### **NDA Review**

- Duration ~24 Months (2 months 7 years)
- Respond to FDA Requests
- Phase IV Plan Being Put in Place

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#### Phase IV

#### Phase IV

- Can be started after the NDA is approved.
- Life time of the drug.
- The main purpose is for safety.

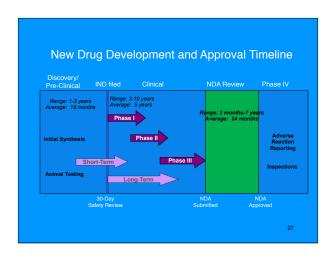
### Phase IV

- Studies to Broaden Use
  - Additional patient populations
    - Age
    - Sex
    - Childbearing potential
    - Pregnancy

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#### **Marketed Drugs**

- Patent is a right given to a manufacturer to exclusively market a new product for a specific period of time under a brand name.
- A patent is good for 20 years.
- Hatch-Waxman Act of 1984
- Extends patent up to **5 years** to compensate for lost time in NDA review before going to market.
- While the drug is under patent, a **generic drug** will NOT be marketed by other companies.



### **Marketed Drugs**

- Medical devices and biological products such as insulin and vaccines must also meet FDA testing and approval requirements.
- The Center for Devices and Radiological Health (CDRH) is responsible for devices.
- The Center for Biologics Evaluation and Research (CBER) is responsible for biological products made from living organisms.

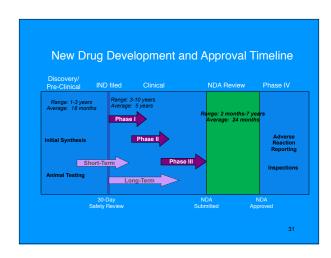
#### **Abbreviated New Drug Application**

- Once the patent has expired other companies may market their version, a generic, of the brand drug if......
- Approval to market a generic version requires submission of an ANDA.
- This is a much shortened process and application.

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#### Abbreviated New Drug Application

- Basically, the generic manufacturer must show bioequivalency with the brand drug
- No safety or efficacy data required
- Preclinical, toxicology etc. is not needed.
- The FDA publishes this information in the "Orange Book".
- www.accessdata.fda.gov/scripts/cder/ob/ default.cfm



# Terms to Know IND NDA Discovery Phase I, II, III, IV Efficacy Safety ANDA Informed Consent Placebo Comparative Bioequivalency Blinded Double-blinded Control group

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