Red Nucleus Guidance Summary Series

Summary of FDA Guidance

red paper

Submitting Documents Using Real-World Data and Real-World Evidence to FDA for Drugs & Biologics: Guidance for Industry. CDER & CBER. May 2019

https://www.fda.gov/media/124795/download

U.S. Dept of Health & Human Services

Food and Drug Administration

Center for Drug Evaluation and Research

Center for Biologics Evaluation and Research

May 2019: Procedural

Introduction

For the purposes of this guidance the FDA defines RWD as follows:

Real-World Data (RWD): Data relating to patient health status and/or the delivery of health care that are routinely collected from a variety of sources:

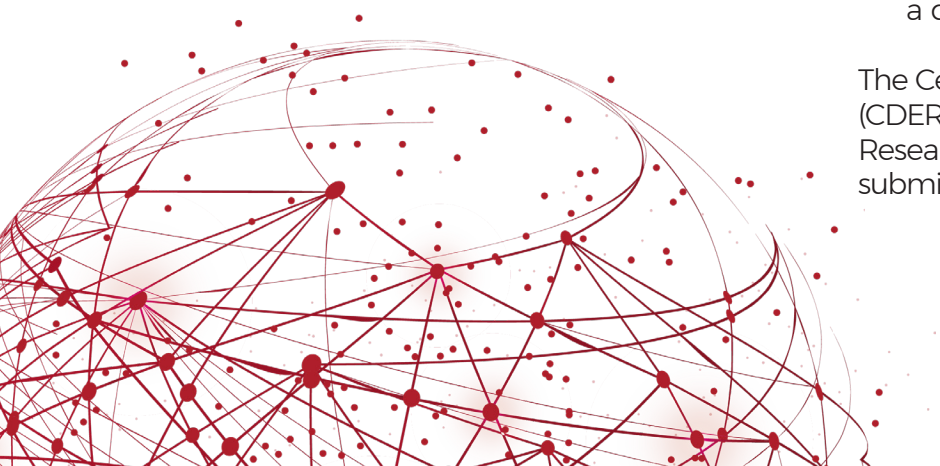
- Electronic health records (EHRs)
- Medical claims and billing data
- Data from product and disease registries
- Patient-generated data including in-home use and/or other decentralized settings
- Data gathered from other sources that can inform on health status, such as mobile devices

The FDA defines RWE as follows:

Real-World Evidence (RWE): The clinical evidence regarding the usage and potential benefits or risks of a medical product derived from analysis of RWD.

RWE can be generated by

- Collecting information about effectiveness or safety outcomes from an RWD source in randomized clinical trials or in observational studies



Background

Exploring the potential for RWE to inform regulatory decisions is mandated by the 21st Century Cures Act (Cures Act):

- FDA is required to establish a program to evaluate the potential use of RWE to help support the approval of a new indication for a drug approved under section 505(c).

The Center for Drug Evaluation and Research (CDER) and the Center for Biologics Evaluation and Research (CBER) intend to track certain types of submissions using RWE under IND, NDA or BLA.

Example Submissions Using RWD/RWE

Relevant submissions can be in different forms:

- New protocols submitted to an existing IND
- A final study report submitted to an NDA or BLA supplement
- A meeting package that discusses the use of RWE

Relevant submissions may include RWE used to support study objectives, such as

- IND submissions for randomized clinical trails that use RWD to capture clinical outcomes or safety data, including pragmatic and large simple trials
- New protocols for single-arm trials that use RWE as an external control
- Observational studies that generate RWE intended to help support an efficacy supplement
- Clinical trials or observational studies using RWE to fulfill a postmarketing requirement to further evaluate safety or effectiveness and support a regulatory decision

FDA does not intend to track RWE submissions that are not tied to a specific product or are not being used to support a regulatory decision.

Submissions that sponsors/applicants need NOT to identify as containing RWE:

- Natural history studies for the development of a clinical outcomes assessment or biomarker
- Feasibility studies using RWE
- Studies using RWD to perform exploratory analyses and generate hypotheses

Identifying RWE Submitted as Part of a Regulatory Submission

Cover letters for submissions containing RWE should include

- Purpose of using RWE as part of the Regulatory Submission
- Study Design using RWE
- RWD Source(s) used to generate RWE

Purpose of Using RWE as Part of the Regulatory Submission

The sponsor or applicant should list the purpose(s) for using RWE in the submission:

- To provide evidence in support of the effectiveness or safety of a new product approval
  - Collecting information about effectiveness or safety outcomes from an RWD source in a randomized clinical trial
- To provide evidence in support of labeling changes for an approved product, including
  - Adding or modifying an indication
  - Change in dose, dose regimen, or route of administration
  - Use in a new population
  - Adding comparative effectiveness information
  - Adding safety information
  - Other labeling changes
- To be used as part of a postmarketing requirement to support a regulatory decision

Study Design Using RWE

The sponsor or applicant should list the clinical study design(s) that includes RWE as part of a submission to support a regulatory decision.

For example

- A randomized clinical trial
- Single-arm trial
- Observational study

RWD Source(s) Used to Generate RWE

The sponsor or applicant should list all of the RWD sources used to generate RWE. RWD sources can include the following:

- Data derived from EHRs
- Medical claims and/or billing data
- Product and/or disease registry data
- Other data sources that can inform on health status
  - Data collected from mobile technologies
  - Patient-generated data

Sample Table to Include in Cover Letter

Purpose(s) of Using RWE as Part of the Submission (Select all that apply)

- ☐ To provide evidence in support of effectiveness or safety for a new product approval
- ☐ To provide evidence in support of labeling changes for an approved drug, including
  - ☐ Add or modify an indication
  - ☐ Change in dose, dose reginem, or route of administration
  - ☐ Use in a new population
  - ☐ Add comparative effectiveness information
  - ☐ Add safety information
  - ☐ Other labeling change. Specify:
- ☐ To be used as part of a postmarketing requirement to support a regulatory decision

Study Design(s) Using RWE (Select all that apply)

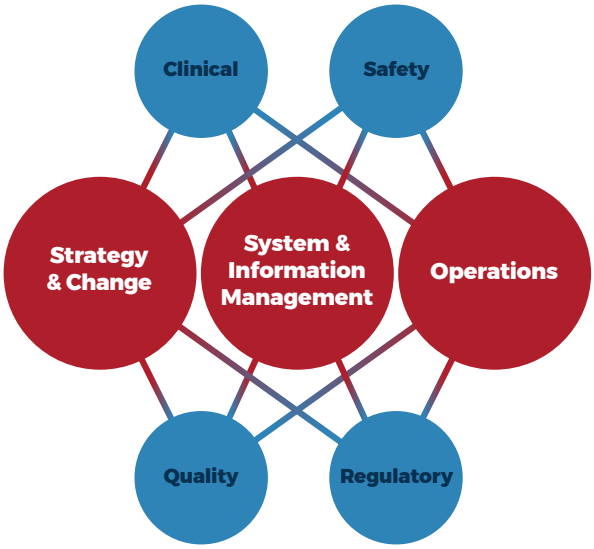
- ☐ Randomized clinical trial
- ☐ Single arm trial
- ☐ Observational study
- ☐ Other study design. Specify:

RWD Source(s) Used To Generate RWE (Select all that apply)

- ☐ Data derived from electronic health records
- ☐ Medical claims and/or billing data
- ☐ Product and/or disease registry data
- ☐ Other data source that can inform on health status. Specify:

Who We Are

Red Nucleus is the premier provider of learning, performance, and process solutions for the life sciences industry. We work exclusively within the life sciences industry to ensure our team intimately understands your business, products, processes, and challenges. Our team is composed of more than 200 full-time employees whose commitment to creativity, quality, and on-time delivery is unrivaled in our space.



Red Nucleus Value

Red Nucleus uses its proprietary tool kit and methodology to aid life science companies establish a Real World Evidence Strategy and Roadmap:

We identify/develop

- System landscape that defines the interconnectivity of the current systems and the utility of those systems as it pertains to RWD and RWE
- Real-world data (RWD) segmentation (current and gaps) to be considered within the strategy through a visualization of the end-to-end data flow via a system landscape
- System analysis (current and gaps against RWD/RWE capability) to be considered within the strategy to enable the collection, analysis, and submission of insights (as needed)
- Three-fold gap analysis through
    1. identification of RWD types that cannot be ingested/analyzed within the company's current system landscape
    2. identification of critical gaps/limitation across the full landscape and within each system as it pertains to RWD or RWE
    3. identification of integration requirements/gaps to enable end state analysis and submission of RWD

This document is intended to provide an overview/ summary of the guidance. For full information please refer to the full guidance.

red nucleus
rednucleus.com

Dalia El-Sherif, Ph.D.

Red Nucleus R&D
Strategy & Change
Practice Lead

delsherif@rednucleus.com

610.909.8831

Michael Swalina, Partner

Red Nucleus R&D
Submission Management
Practice Lead

mswalina@rednucleus.com

610.427.9570