

Variability of Regenerative Engineering Products and the Regulatory Approval Pathway

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Forum on Regenerative Medicine

October 18, 2018

Regenerative Medicine: Variety of Products



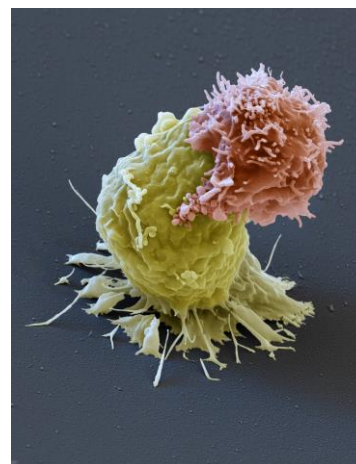
Bioengineered skin



Bioengineered blood vessel



Bioengineered bladder



Chimeric antigen receptor-T cell
(in red attacking cancer cell in yellow)



Sources of Variability Potentially Affecting Regulatory Approval

- Donor pretreatment
- Cell or tissue identity
- Manufacturing steps
- Preparative regimen in recipient
- Clinical trial inclusion and exclusion criteria
- Endpoint assessment
- Disease outcome

Expedited Programs for Regenerative Medicine Therapies – Draft

- Describes FDA's considerations in implementing the Regenerative Medicine Advanced Therapy Designation (RMAT) to expedite product development and review
 - Applies to certain cell therapies, therapeutic tissue engineering products, human cell and tissue products, and combination products
 - Genetically modified cell therapies and gene therapies producing durable effects included



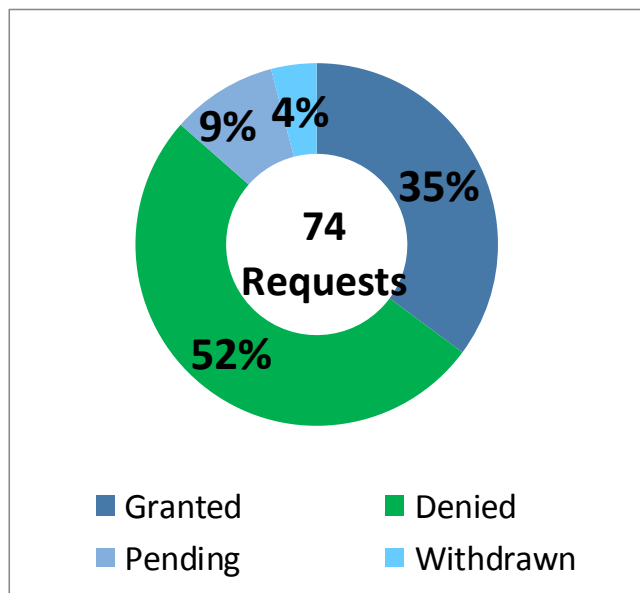
Regenerative Medicine Advanced Therapy Designation (RMAT)

- Products must be intended for serious or life-threatening diseases or conditions
- Preliminary clinical evidence must indicate potential to address unmet medical needs
- FDA will reply to submitted designation requests with 60 days
- Designated products are eligible as appropriate for priority review and accelerated approval

RMAT Accelerated Approval Provisions

- Post-approval requirements can be fulfilled as appropriate through submission of
 - Clinical evidence, clinical studies, patient registries or other sources of real world evidence such as electronic health records
 - Collection of larger confirmatory datasets as agreed upon
 - Post-approval monitoring of all patients treated with such therapy prior to approval of the therapy

RMAT Designations Granted



Data as of August 30, 2018

- 26 products granted designation
- 17/26 products have Orphan Product designation
- Most are cellular therapy products or cell-based gene therapy products

Challenges in the Development of Regenerative Medicine Therapies

- Need for standards for the reproducible production of regenerative medicine products
 - Collaboration with National Institute of Standards and Technology (NIST)
 - Standards Coordinating Body
- Transition from pilot scale to commercial manufacturing can be challenging
 - Distributed versus centralized manufacturing
 - Consider scalable manufacturing processes

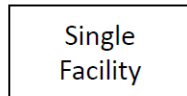


Challenges in the Development of Regenerative Medicine Therapies

- Need novel approaches to clinical development to address complex therapies and small patient populations
 - Develop integrated development plans
 - Collaborative development is sometimes possible

Innovative Development Program for Regenerative Medicine Products

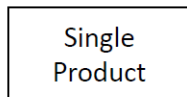
Traditional Development of a Biologic Product



Product produced at a single manufacturing site



Multiple clinical trial sites enroll into a common clinical protocol using product manufactured at the single site



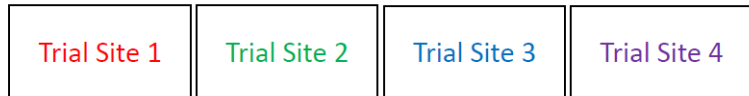
Single biologics license issued

NEJM 2018; 378: 954-959

Alternative Development of a Biologic Product



Multiple manufacturing sites using essentially identical process



Multiple clinical trial sites enroll into a common clinical protocol using product manufactured at the local facility



Multiple biologics licenses issued, each based on submission of a combination of the facility-specific manufacturing information with the common clinical trial data from all sites

Resources for Product Development

- Sponsors are encouraged to contact the Office of Tissues and Advanced Therapies early on to discuss plans for development
 - INTERACT program (Initial Targeted Engagement for Regulatory Advice on CBER products)
 - Email industry.biologics@fda.hhs.gov
- Useful information for product developers can all be found on FDA's website www.fda.gov

Summary

- FDA is committed to advancing the development and evaluation of regenerative medicine products
 - Helping to individualize product development
 - Working to overcome limitations in manufacturing
 - Providing input and collaboration on novel endpoints
 - Encouraging innovative clinical trial designs

