INSIDE STORY FOR REVIEW OF AN ABBREVIATED NEW DRUG APPLICATION

Available online at www.ijdra.com

REVIEW ARTICLE

[1]Gupta Rajkumar

[1]Managing Director Perfect Pharmaceutical Consultant Pvt. Ltd and Global Institute of Regulatory Affairs, Pune India.

Corresponding Author's E-mail: guptarmg1952@gmail.com

Abstract:

ANDA constitutes an important submission for marketing authorization of generic drugs. The FDA has recently mandated an electronic submission in the form of eCTD for the same. ANDA application is quite complex with respect to patent rights and BE evaluations. The incomplete applications are often refused to file and the accepted applications some time get disqualified due to technical deficiencies at the manufacturing site. Recently FDA has rejected many ANDA applications in ASEAN region on account of data integrity.

Keywords: ANDA, FDA, NDA, eCTD, DMF.

Introduction:

Food and Drug Administration (FDA) grants approval for marketing authorization for new as well as generic drugs against review of detailed scientific, clinical and non clinical information included in the application called as NDA, ANDA and DMF

FDA is very transparent in procedures and policies for the contents and review of theses submissions. This article is written to explain the inside review procedures followed by FDA for the same. This article will be very useful in designing, drafting, and submission and follow-up of ANDA submission with FDA. (1)

Submitting ANDA

ANDA is a regulatory submission for authorization of generic version of New Drugs after expiry of its patent period. Currently, filing ANDA is not as simple as it was before. The day by day hurdles are multiplying. Currently FDA has stopped accepting paper submissions and only electronic filings in the form eCTD are entertained. Followings are critical steps for initial filing and review of ANDA. (1)

The application for ANDA is required to be addressed to:

Center for Drug Evaluation and Research
Food and Drug Administration
Document and Records Section
5901-B Ammendale Rd
Beltsville, Md. 20705-1266

Following information are required in 5 Modules of CTD for submitting ANDA application. (2)

Module 1 shall contain:

Cover letter requesting the review and marketing authorization for the product applied.
Information on the product in form 2657 (downloadable from FDA site).
Information on manufacturing facility in form 2656 (downloadable from FDA site).
Information as per FDA form 356h and form 3674 (downloadable from FDA site).
Field copy certification
Debarment certification
Financial Certification
Patent information
Patent certifications

Letters of authorization for reference to other applications or drug master files (if applicable)
US Agent Letter of Authorization
Proprietary name request (if applicable)
Basis of ANDA submission
Comparison between Generic Drug and RLD-505(j) (2) (A)
Request for waiver for BA/BE studies, if any
Draft labeling , Package Insert , Patient Information , Medication Guide, Labeling comparison with approved product (SPL format).
Financial disclosure information
Environmental assessment or request for categorical exclusion.
Statements of claimed exclusivity and associated certifications.
CTD Module 2 shall contain: Overviews and summaries related to quality and BA/BE studies.
CTD Module 3: It shall contains detailed Quality information on API and Dosage Form.
CTD Module 4: This module is normally not required for ANDA.
CTD Module 5: This module only requires BA/BE study details.

The entire set of information shall be submitted in triplicate as per below:

Archival Copy- The archival copy is a complete set of the information filed with ANDA application. It serves as the official archive of the application and may be used during the review of the application. It shall have blue color binder.

Review copy- It is meant for evaluation of the contents by different reviewers. It shall have red color.

Field copy- It contains only Quality section (Module 3). It shall have Green Color

The failure to provide any one of these copies will induct “Refuse to File” letter from FDA

Standard U.S. letter size paper (8.5 x 11 inches) should be used for all submissions.

Further, the Narrative text shall be in Times New Roman 12 point font. Font sizes 9 to10 shall be considered for tables.

All documents should have page numbers.

ANDA Review procedure

The standard procedure for review of ANDA is as per follows (3):

- Receipt of ANDA filing and review fees by the applicant.
- Incomplete and Deficient applications are promptly issued "refuse to file” letter. Site verification and inspection is done concurrent with the application review. If the facility is deficient the approval is held up till the deficiencies are rectified.
- Technical Documents (CTD) are reviewed by OGD/CDER review team If any information such as Labeling, Chemistry, Manufacturing, Control and Microbial Safety) is found to be un-satisfactory “Not approvable “letter is issued to the applicant.
- If BE study results are not satisfactory “Bio deficiency” letter is issued to the applicant.
- When there are no queries the applicant finally receives FDA approval letter.
- Currently patent certifications and data integrity have become major issues for approval of ANDA. Recently many ANDA applications were kept on hold on data integrity issues.

Summary

ANDA filings require an application in prescribed form along with necessary certificates and technical details in eCTD format. The application is critically reviewed by office of generic Drugs (OGD) for all issues related to safety, efficacy and safety of the products. The facility and data integrity is verified through facility audit.

References

1. Wikipedia, the free encyclopedia. Abbreviated New Drug Application [Internet].US: United States Department of Health and Human Services; 2013 [updated 2013 Aug 31; cited 2013 Oct 20]. Available from: http://en.wikipedia.org/wiki/Abbreviated_New_Drug_Application
2. FDA. Abbreviated New Drug Application (ANDA) Forms and Submission Requirements [Internet]. US: U.S. Food and Drug Administration; [date

unknown] [updated 2014 March 28; cited 2013 Oct 22]. Available from: http://www.fda.gov/

3. FDA. Question-Based Review for CMC Evaluations of ANDAs [Internet].US: U.S. Food and Drug Administration; [date unknown] [updated 2012 Jan 13; cited 2013 Oct 17]. Available from: http://www.fda.gov/

