2 Divisions, 1 Purpose: Regulatory Support for fielding Medical Products for the Warfighter

UNCLASSIFIED

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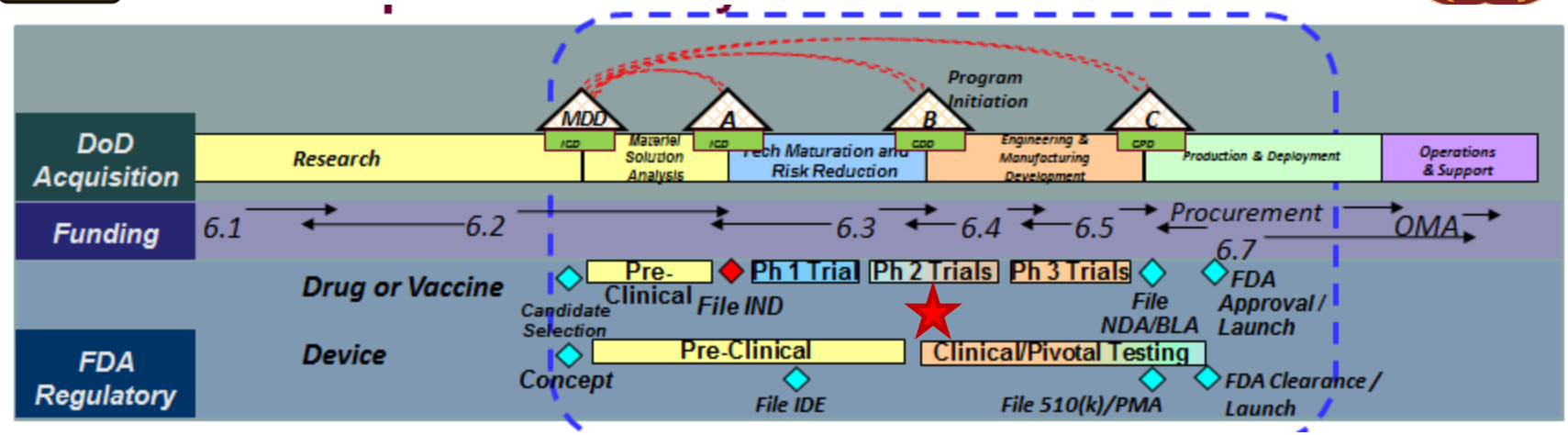
Purpose

- Division of Regulated Activities and Compliance (DRAC) and Clinical Support Services Division (CSSD) within the United States Army Medical Materiel Development Activity (USAMMDA) provide tailored regulatory support to product developers across the Department of Defense
- USAMMDA regulatory teams currently support
  - *Over 80 active projects*
  - *20 additional potential and/or developing projects*
  - *70 clinical studies in varying stages*
- USAMMDA integrated regulatory team
  - *The Surgeon General (TSG), Dept. of the Army = Sponsor*
  - *Principal Assistant for Acquisition (delegated sponsor authority)*
  - *Senior Regulatory Affairs Advisor (advises PAA)*
  - *Division of Regulated Activities and Compliance*
  - *Clinical Services Support Division*

Regulatory Support Across the Product Development Lifecycle



Army Efforts/Partnerships Mimic Industry:
Integrated Product Teams (IPTs)

- Typical Members:
  - Program/Project Manager
  - Regulatory Affairs
  - Manufacturing/Testing Support
  - Clinical Management Support
- Team consensus decision with dispute resolution board
- Support tailored to product development strategy
  - TSG Sponsored – active development and management of regulatory strategy, manufacturing, and clinical development
  - Not TSG Sponsored
    - Inexperienced sponsor – active oversight of sponsor's development efforts
    - Experienced sponsor – consultant to sponsor and IPT

Industry partners are typically sought by Phase 2 and they typically serve as the sponsor through approval (w/ some exceptions).

Regulatory Management and Support

- All medical products in the Department of Defense (DoD) acquisition framework require FDA approval
  - ➢ *Regulatory is critical to reduce risk and ensure program success*
- Regulatory Management encompasses the processes, procedures, approaches, and standards to assess safety, efficacy, quality, and performance of FDA-regulated products with the goal of expediting product licensure in compliance with regulations (FDA and Army)
- Program delays due to unacknowledged FDA requirements increase cost, lengthen schedule, waste manpower, and increase risk

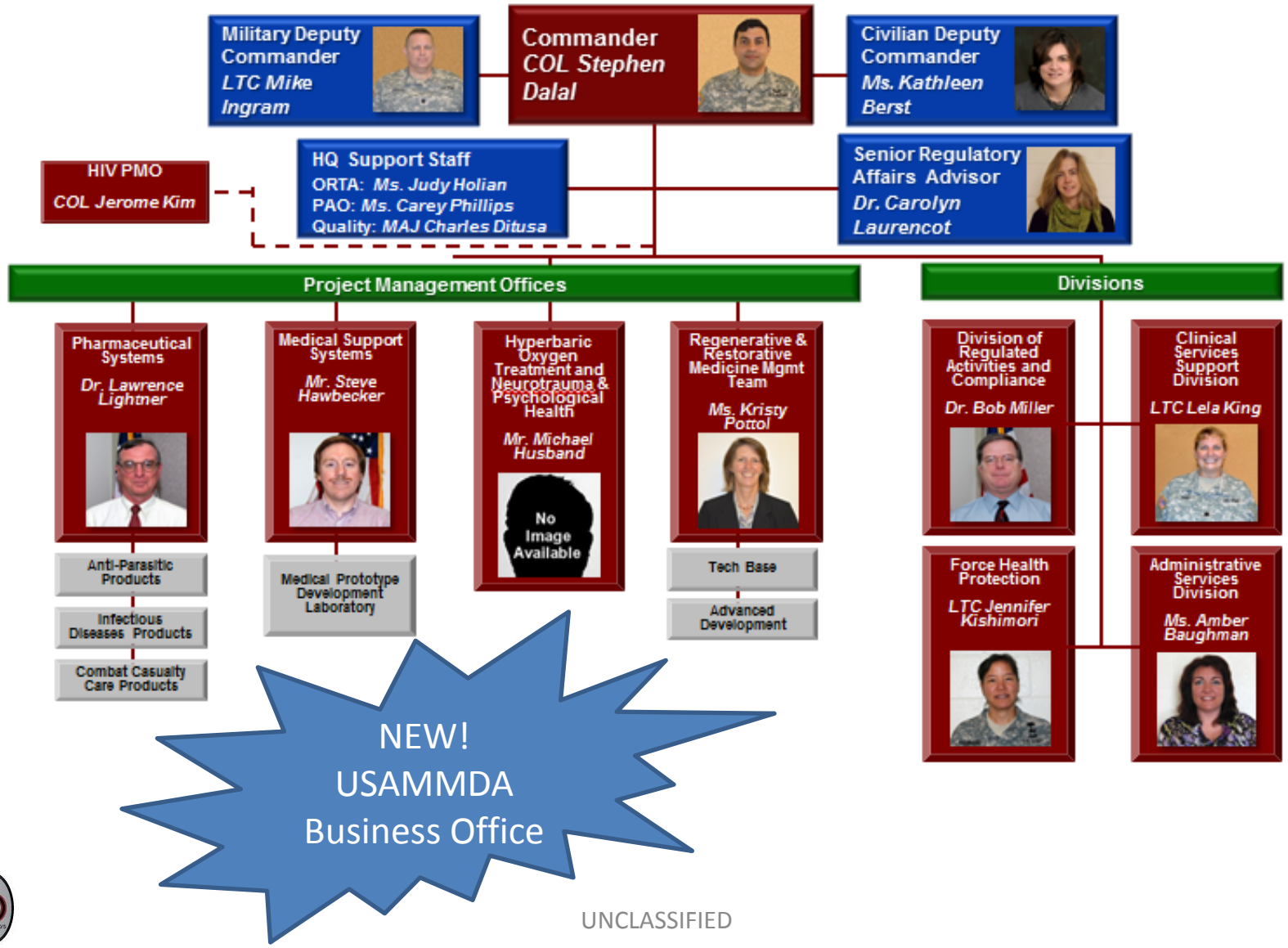
Regulatory Management and Support

- Critical to identify if research is FDA-regulated
- Regulatory should be involved as early as possible
  - *BEFORE intended use and indications for use are being established*
  - *BEFORE manufacturing processes are established*
- FDA medical product regulations are complex and explicitly required
- Scientific and regulatory development input must be up-to-date
- Maintaining good relationship and good standing with FDA is crucial to continued success

Types of Regulatory Support

- Full
  - *TSG-sponsored products funded by the Army and some products funded by other Services (typically Phase 1).*
  - *DRAC, CSSD personnel provide direct and complete support to product development efforts in one or many of the specific areas*
- Oversight (inexperienced sponsors)
  - *Ensure compliance with regulations for any sub-contracted work for Army and/or other agencies or partners.*
  - *Typical examples include review of key regulatory deliverables (eg, clinical monitoring plans, data management plans)*
- Consultation (experienced sponsors)
  - *Advice and recommendations*
  - *Typically for early development and grants management*

USAMMDA Organization Chart



CSSD

MISSION:

Provide manufacturing, nonclinical and clinical support services for FDA-regulated medical products throughout the DoD acquisition spectrum, from candidate optimization to product approval.

CSSD

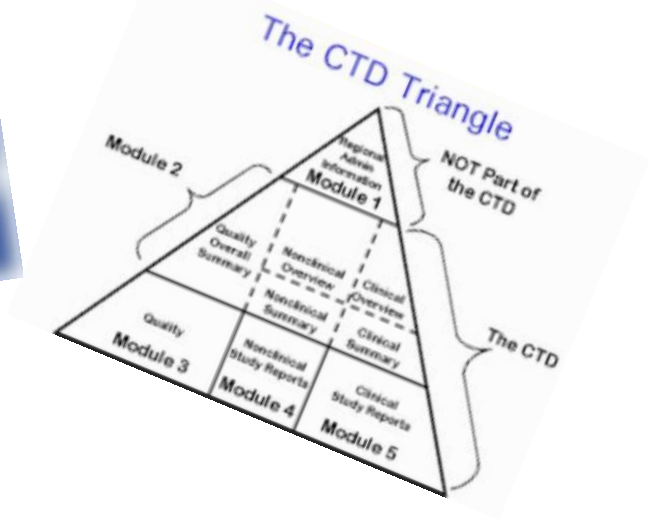
- Investigational New Drug (IND) manufacturing, testing and accountability
- Clinical study monitoring and data management
- Nonclinical study design and GLP compliance review
- Biostatistical support, including study design and data analysis
- Adverse event reporting and safety surveillance
- Study site visits for cGMP, GLP and GCP compliance

CSSD

Product Safety Surveillance	Clinical Operations	Data Management	Product Technical Operations	Biostatistics
• Adverse Event Review, Causality Assessment, & Reporting to FDA • Product safety surveillance • Adverse Event Coding (MedDRA) for safety analysis	• Advise and concur on clinical protocol development • Provide clinical site selection and development support, including SOP development • Provide clinical trial monitoring services • Ensure study volunteer rights are protected • Provide clinical database design and implementation; Design Case Report Forms • Provide clinical data management support • Provide clinical site training	• Provide oversight of CRO data management support for all OTSG Studies • Provide full support in data collection and management services, including CRF design, data entry and tracking, data cleaning and validation • Provide full support in technical services in clinical database design, development, testing, validation, and maintenance • Provide full and oversight support in medical coding services using the industry standard dictionaries such as MedDRA and WHO-Drug	• Conduct GMP and GLP facility audits • Lot release and stability protocol development & review • Support IND product manufacturing, testing, shipping, accountability • Advise on GLP animal study design and execution • Advise on non-clinical study testing requirements • Advise on assay validation requirements • Advise on equipment validation requirements	• Advise and concur on clinical development strategies • Advise and concur on appropriate protocol design • Provide data analysis • Provide oversight of CRO statistical support

MISSION:

Provide full-service regulatory support for products through the DoD acquisition spectrum, from individual investigator-initiated clinical studies to products in the advanced development pipeline



DRAC

- Primary point-of-contact for all formal and informal communications with the FDA
- Develops and executes regulatory strategies for compliant use and FDA approval of Surgeon General, Department of the Army-sponsored drugs, vaccines and devices
- Provides support to IPTs by writing INDs, IDEs, clinical protocols, Investigator's brochures, annual reports and other regulatory documents
- Provides support for electronic sponsor's files and submission to the FDA through the electronic submissions gateway (ESG)

DRAC

Discovery	Preclinical	Regulatory Strategy & Consultation	Regulatory Document Submission	Clinical Trials	Licensure
• Representative on tech base IPT • Technical data packages • Worksheet creation • Consultation • Pre-Validation	• GLP Protocol Development • Assess data for proposed IND package • Pre-market manufacturing review	• Representative on IPT • Develop Regulatory Strategy • Regulatory project management • Drug Master Files • IND Determinations • IDE Determinations • Site Assistant Visits • Interface with FDA • Computer system compliance	• Pre-IND Package • Pre-IDE Package • 513(g) requests • FDA Meeting Preparation & Coordination • Investigational New Drug Application • Investigational Device Exemption Application • Investigator Brochures • Pre-Emergency Use Authorizations • Drug Master Files • SOP Development	•Clinical Protocol Development •Annual Report Preparation •IB Updates •Safety Reports •FDA Meetings •Protocol Development	• Biologic License Application • New Drug Application • Device 510(k) • Device Premarket Application • Label Changes • Post-marketing Reports • Post-market manufacturing oversight

Questions?

- Initiating regulatory support and partnerships:
  - *Regulatory Business Operations Office (*usarmy.detrick.medcom-usammda.mbx.regulatory-budget-requests@mail.mil*)*
  - *Fill out simple request form*
  - *Meet with DRAC and CSSD team to develop regulatory support plan*