Review Initiation Strategies at Health Canada

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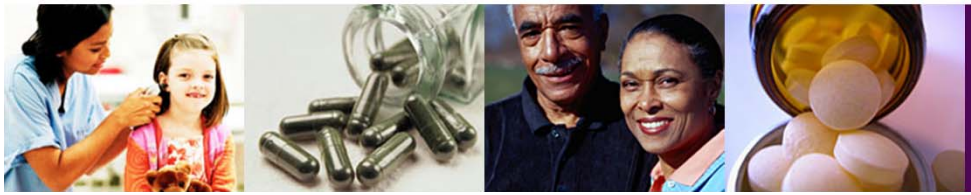
Canada

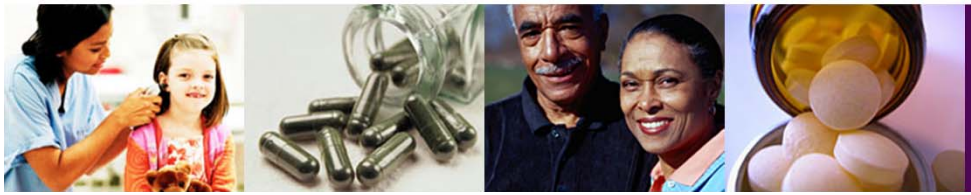
Starting a Device or Drug Review

1. Application screening / validation
2. Early identification of serious deficiencies
3. “Kick-off” meetings (drugs)
4. Determining consultation needs



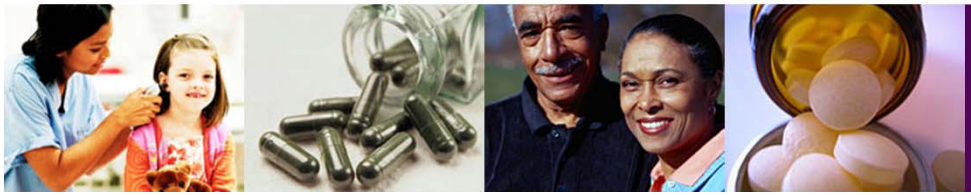
Regulatory Screening / Validation

- Device and drug applications are screened (or validated) for scientific and regulatory content before they are assigned for review
- This is a high-level scan of the data provided, to determine whether the application is complete
- This is not done to determine whether the product can be authorized! That is the role of the review process.



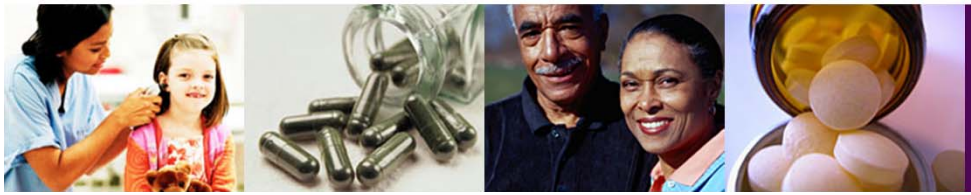
Application Rejection

- "Screening Deficiency Letters" are issued for applications considered to be incomplete
- The letters contain specific requests for additional scientific and/or regulatory information
- If the information filed in response to the Letter is inadequate, the application is rejected and does not undergo a review



Application Acceptance

- "Screening Acceptance Letters" are issued for applications considered to be complete and acceptable for review
- Applications are only assigned for review after a Screening Acceptance Letter has been issued
- A screening report is generated, which highlights important issues to be considered during the review of the application



Application Information / Information de soumission

Application #/ No. de soumission	Licence Name/Nom de l'homologation	Device Class / Classe de l'instrument
Manufacturer/Fabricant:		Category Hospital Use [ ] Home Use [ ]
Licence # / No. de l'homologation:	Reason for amendment (if applicable) / Raison de l'amendement (si applicable)	

	Review Components	# Reviews	Info required	Comments
	Background Information Device Description		☐	
	Marketing History		☐	
	Standards & Conformity Declaration		☐	
	Bibliography		☐	
	Labelling		☐	
III	**Summary and Conclusions of studies** Pre-clinical Studies		☐	
	Clinical Studies		☐	
	Near patient IVDD		☐	
	Software Validation		☐	
	Sterilization		☐	
IV	**Risk Assessment**		☐	
	Quality Plan		☐	
	Material Specification		☐	
	Biological Safety		☐	
	Manufacturing Process		☐	
	Process Validation		☐	
	Software Validation		☐	
	Pre-Clinical Studies		☐	
	Clinical Studies Near Patient IVDD		☐ ☐	

Note to the Reviewer (e.g. predicate, reference, cautions, directions) ☐ CD incl.

Recommendation

Comments: Licensing Deficiencies? ☐ Yes

STEP C5 & C6

STEP C11

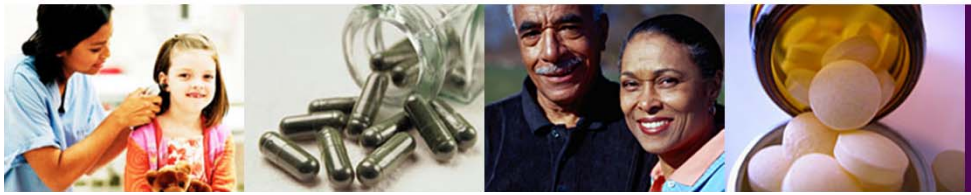
STEP C4, C8, C9, C13

STEP C14iv

STEP C7, C12

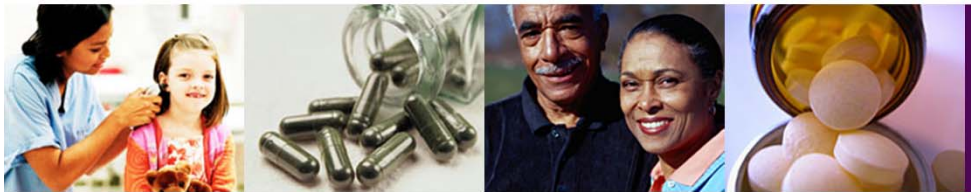
Why would an application be considered incomplete? (Devices)

- Quality Systems Certificate is not available or unacceptable
- Only pilot clinical trial results or interim results available for a novel design or indication for use
- Software or bench testing verification and/or validation is planned but not complete
- No scientific data provided (e.g. only labelling and FDA 510K certificate have been provided)
- etc.



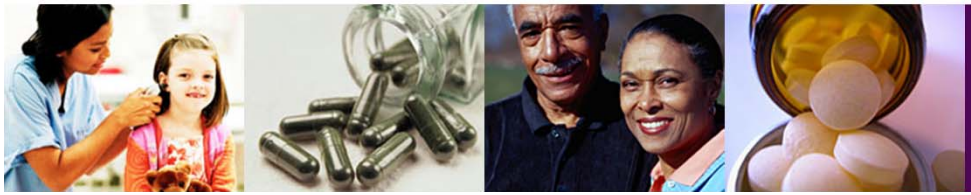
Screening is a Good Review Strategy

- A good application is needed to produce a good review
- Rejecting poor applications allows reviewers to spend time only on good applications
- Highlighting important issues early in the process helps reviewers determine which areas of the application need more attention



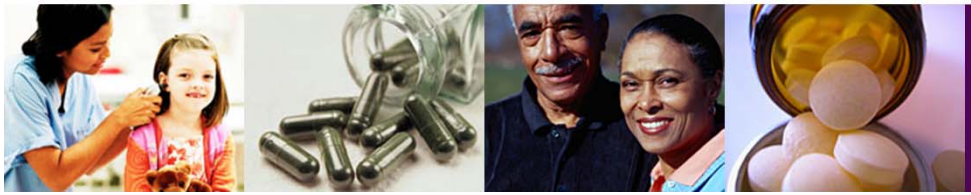
Early Identification of Serious Deficiencies: Devices

- Incomplete applications must be identified at the screening phase
- Once the application has received a screening acceptance letter, it must undergo a full review
- There is no mechanism to stop the review due to serious deficiencies



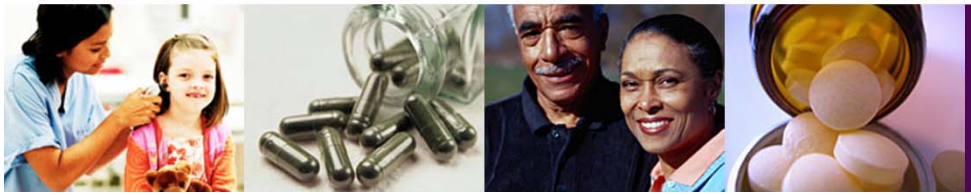
Early Identification of Serious Deficiencies: Drugs

- The review phase can be stopped if serious deficiencies in the application are identified
- A “Notice of Deficiency” is sent, outlining the “major objections” and “other concerns”
- The safety, efficacy, and quality reviews are halted, regardless where the deficiencies are found



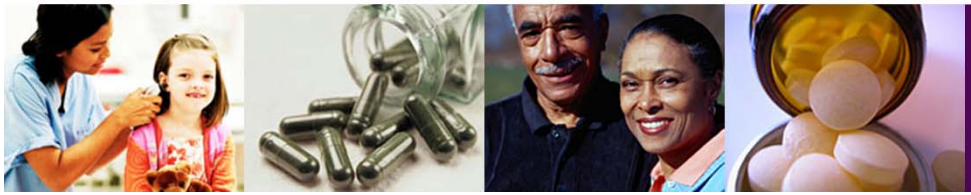
Early Identification of Serious Deficiencies: Drugs (2)

- If the information filed in response to the Notice is inadequate, the application is rejected and the reviews are not completed
- The applicant may re-file at a later date



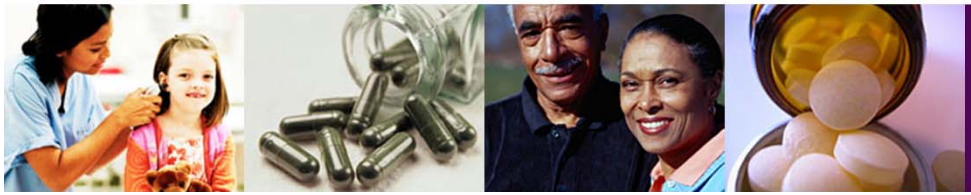
What is a serious deficiency?

- Serious deficiencies (or “major objections”) preclude continuing the review
- The data are insufficient to conduct an appropriate benefit risk assessment
- “Other concerns” allow for a benefit risk assessment, but preclude making a recommendation for marketing authorization under the current conditions (e.g. patient population, shelf life)



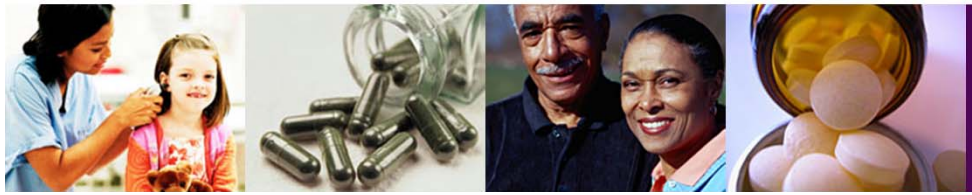
Examples of Serious Safety and Efficacy Deficiencies

- Not enough non-clinical / clinical studies
- Not enough patients in studies
- Outcome measure not validated
- Major trial design flaw precludes interpretation
- Trial design is inconsistent with stated objectives
- etc.



Examples of Serious Quality Deficiencies

- Compliance with Good Manufacturing Practices has not been established
- Sterilization methods are inadequate
- No batch data from production facility
- Significant formulation changes not supported by bioequivalence data
- etc.



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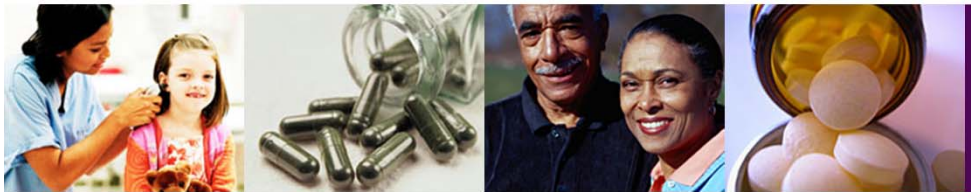
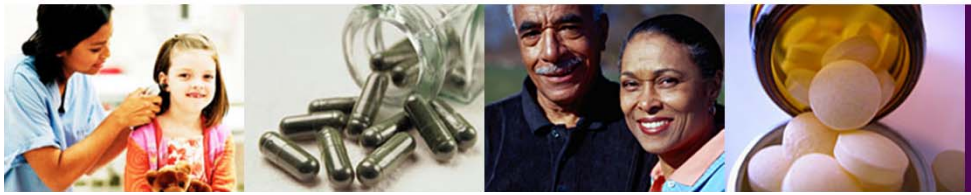


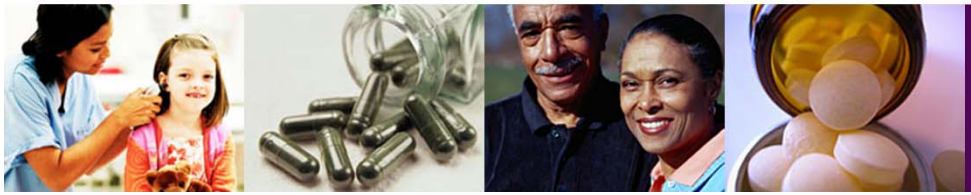
Kick-off Meetings (Drugs)

- Device applications are generally assigned to one reviewer to conduct the review of safety, effectiveness, and manufacturing
- Drug applications are generally assigned to at least three reviewers to conduct separate reviews of safety, efficacy, and quality, requiring significant coordination



Kick-off Meetings (2)

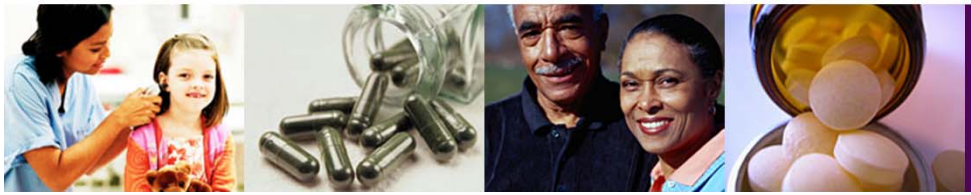
- Held approximately two weeks after the review of the application has begun
- Review manager, reviewers, and regulatory project manager attendance is required
- Additional staff may be invited (e.g. Summary Basis of Decision technical writer, post-market reviewers)



Review Kick-off Meetings (3)

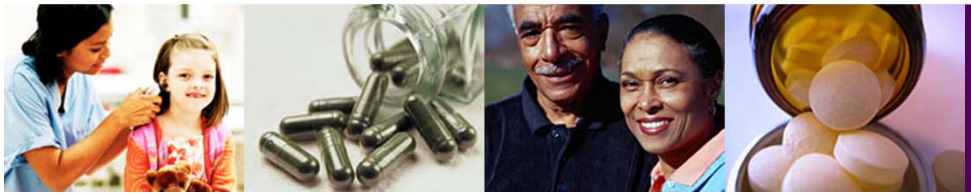
The goal of the meeting is to

- confirm responsibilities for different components of the review,
- set targets for different stages of the review,
- establish timeline for communication among the reviewers and with the applicant,
- discuss significant deficiencies that can result in rejection of the application.



Holding kick-off meetings is a Good Review Strategy

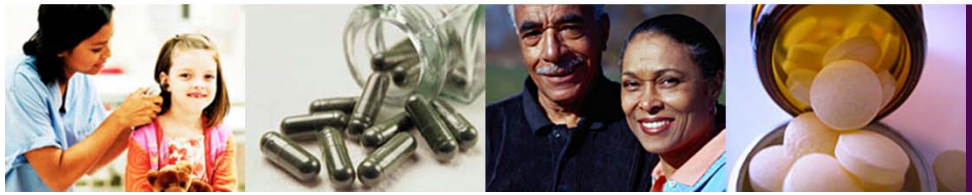
- Highlighting important issues early in the process helps reviewers determine which areas of the application need more attention
- Having face-to-face meetings improves collaboration throughout the review phase
- Highlighting important issues early in the process provides sufficient time to engage additional experts if needed



Determining Consultation Needs

Reviewers of devices and drugs can consult with others for certain aspects of the application, such as

- other reviewers (e.g. biostatisticians),
- other staff (e.g. lawyers),
- external experts (e.g. Scientific Advisory Committee on Medical Devices used in the Cardiovascular System),
- other regulators,
- and even the applicant!



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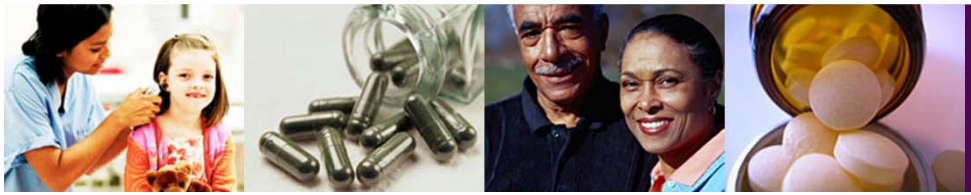

Good Review Initiation Strategies…

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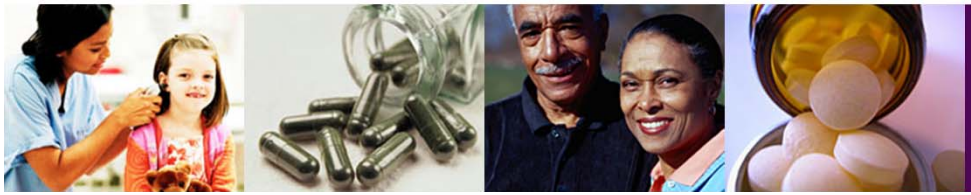
- Determining consultation needs



…help provide the Key Elements of a Good Review:

- is learned, uses critical analyses, identifies signals, investigates issues, makes linkages, considers context, involves consultation, is balanced, is thorough, is well-documented.