

Drug Applications

CDER Home | Site Info | Contact Us | What's New

Search



















APPLICATION PROCESS:

Investigational Drugs New Drugs Generic Drugs

Drug Approval Application Process

- Introduction
- From Fish to Pharmacies: The Story of a Drug's Development
- Investigational New Drug Application
- New Drug Application
- Abbreviated New Drug Application for Generic Drug Products
- Biological Therapeutic Products
- Guidance Documents for Drug Applications
- Information for Clinical Investigators
 - Institutional Review Boards and Protection of Human Subjects in Clinical Trials
- Laws, Regulations, Policies and Procedures
- Drug Application Regulatory Compliance
- Drug Application Forms and Electronic Submissions
- Organization, Contact, and Meeting Information
- Drug Development and Review Definitions
- Small Business Assistance Program
- Electronic Regulatory Submission and Review (ERSR)
- Post Drug-Approval Activities

Introduction

The Center for Drug Evaluation and Research's (CDER) job is to ensure that drugs are safe and effective. (See "Benefit vs. Risk: How FDA Approves New Drugs"). CDER does not test drugs, although the Center's Office of Testing and Research does conduct limited research in the areas of drug quality, safety, and effectiveness.

CDER is the largest of FDA's five centers, with a staff of about 1,800. It has responsibility for both prescription and over-the-counter drugs. For more information on CDER activities, including performance for drug reviews, post-marketing risk assessment, and other highlights, please see the CDER Report to the Nation: Improving Public Health Through Human Drugs. The other four FDA centers have responsibility for medical and radiological devices, food, and cosmetics, biologics, and veterinary drugs.

It is the responsibility of the company seeking to market a drug to test it and submit evidence that it is safe and effective. (See <u>"Testing Drugs in People"</u> in the July-August 1994 *FDA Consumer*.) A team of CDER physicians, statisticians, chemists, pharmacologists, and other scientists reviews the sponsor's new drug application (NDA) containing the data and proposed labeling.

For more information on drug development, drug review, and postmarketing activities please see these resources:

- <u>The FDA's Drug Review Process: Ensuring Drugs are Safe and Effective.</u> (7/2002).
 FDA Consumer magazine article.
- <u>From Test Tube to Patient: Improving Health Through Human Drugs</u> (2006). In-depth review of drug development and postmarketing activities.
- New Drug Development in the United States. Online seminar provides healthcare professionals with an overview of FDA's role in the new drug development process.

The section below entitled *From Fish to Pharmacies: The Story of a Drug's Development*, illustrates how a drug sponsor can work with FDA's regulations and guidance information to bring a new drug to market.

From Fish to Pharmacies: The Story of a Drug's Development

Osteoporosis, a crippling disease marked by a wasting away of bone mass, affects as many as 2 million American, 80 percent of them women, at an expense of \$13.8 billion a year, according to the National Osteoporosis Foundation., The disease may be responsible for 5 million fractures of the hip, wrist and spine in people over 50, the foundation says, and may cause 50,000 deaths. Given the pervasiveness of osteoporosis and its cost to society, experts say it is crucial to have therapy alternatives if, for example, a patient can't tolerate estrogen, the first-line treatment.

Enter the salmon, which, like humans, produces a hormone called calcitonin that helps regulate calcium and decreases bone loss. For osteoporosis patients, taking salmon calcitonin, which is 30 times more potent than that secreted by the human thyroid gland, inhibits the activity of specialized bone cells called osteoclasts that absorb bone tissue. This enables bone to retain more bone mass.

Though the calcitonin in drugs is based chemically on salmon calcitonin, it is now made synthetically in the lab in a form that copies the molecular structure of the fish gland extract. Synthetic calcitonin offers a simpler, more economical way to create large quantities of the product.

FDA approved the first drug based on salmon calcitonin in an injectable. Since then, two more drugs, one injectable and one administered through a nasal spray were approved. An oral version of salmon calcitonin is in clinical trials now. Salmon calcitonin is approved only for postmenopausal women who cannot tolerate estrogen, or for whom estrogen is not an option.

(Excerpted from FDA Consumer magazine, Jan-Feb 1999, "Drugs of the Deep: Treasures of the Sea Yield Some Medical Answers and Hint at Others," by John Henkel).

How did the developers of injectable salmon calcitonin journey "from fish to pharmacies?"

For drug sponsors and others who want a basic understanding of the drug development process, the FDA has published a series of articles in a special report called "From Test Tube to Patient: Improving Health Through Human Drugs" These articles provide background information on a broad range of topics from laboratory and animal studies, to reporting unsafe medical products already on the market. Another resource for drug development information is an interactive chart which graphically displays the process with an emphasis on preclinical (animal) research and clinical (human) studies or trials conducted by the drug's sponsor.

After obtaining promising data from laboratory studies, the salmon calcitonin drug developers took the next step and submitted an Investigational New Drug (IND) application to CDER. The IND Webpage explains the need for this application, the kind of information the application should include, and the Federal regulations to follow.

Once the IND application is in effect, the drug sponsor of salmon calcitonin could begin their clinical trials. After a sponsor submits an IND application, it must wait 30 days before starting a clinical trial to allow FDA time to review the prospective study. If FDA finds a problem, it can order a "clinical hold" to delay an investigation, or interrupt a clinical trial if problems occur during the study.

Clinical trials are experiments that use human subjects to see whether a drug is effective, and what side effects it may cause. The <u>Information for Clinical Investigators Webpage</u> provides links to the regulations and guidelines that the clinical investigators of salmon calcitonin must have used to conduct a successful study, and to protect their human subjects.

The salmon calcitonin drug sponsor analyzed the clinical trials data and concluded that enough evidence existed on the drug's safety and effectiveness to meet FDA's requirements for marketing approval. The sponsor submitted a New Drug Application (NDA) with full information on manufacturing specifications, stability and bioavailability data, method of analysis of each of the dosage forms the sponsor intends to market, packaging and labeling for both physician and consumer, and the results of any additional toxicological studies not already submitted in the Investigational New Drug application. The NDA Webpage provides resources and guidance on preparing the NDA application, and what to expect during the review process.

New drugs, like other new products, are frequently under patent protection during development. The patent protects the salmon calcitonin sponsor's investment in the drug's development by giving them the sole right to sell the drug while the patent is in effect. When the patents or other periods of exclusivity on brand-name drugs expire, manufacturers can apply to the FDA to sell generic versions. The Abbreviated New Drug Applications (ANDA) for Generic Drug Products Webpage provides links to guidances, laws, regulations, policies and procedures, plus other resources to assist in preparing and submitting applications.

Drug sponsors from small businesses can take advantage of special offices and programs designed to help meet their unique needs. The <u>Small Business Assistance Webpage</u> provides links to FDA laws, regulations and guidances that affect small business. Information is also provided on financial assistance and incentives that are available for drug development.



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