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# Basic Concept of Good Registration Management

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## **Outline**

- Concept of Good Registration Management (GRM)
- APEC GRM Roadmap with its key outcomes
- Training programs for APEC
- Performance indicators
- Summary



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## Concept of Good Registration Management



**GRM:** A concept to promote efficient registration process for medical products by promoting Good Review Practice (GRevP) and Good Submission Practice (GSubP) cooperatively.

**Goal of GRM:** To benefit the patients with timely access of medical products of safe, efficacious and good quality

## Definitions and Objectives (1)

#### **Good Review Practice**

#### **Definition**

GRevPs are <u>documented best practices</u> for any aspect related to the process, format, content and management of a <u>medical</u> <u>product review</u>.

## **Objective**

The objective is to help achieve <u>timeliness</u>, <u>predictability</u>, <u>consistency</u>, <u>transparency</u>, <u>clarity</u>, <u>efficiency</u> and <u>high quality</u> in both the content and management of reviews.



## **Definitions and Objectives (2)**

#### **Good Submission Practice**

#### **Definition**

An <u>industry practice</u> for any aspect related to the process, format, contents and management of <u>submission for registration of medical products</u> by applicants.

It is the practice to enhance the quality and efficiency of the product registration process by improving the quality of submission as well as its management.

## **Objective**

The objective is to help applicants prepare good quality submission leading to successful registration



## **Outline**

- Concept of GRM and its objective and goal
- APEC GRM Roadmap with its key outcomes
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## APEC Roadmap to Promote GRM (2011-2020)

Co-champions: Chinese Taipei and Japan

Goals of the GRM Roadmap

To <u>promote the concept of GRM</u> and thereby enhance mutual trust for regulatory convergence among the APEC member economies by 2020

## Goals of the key elements of GRM

Good Review Practice	Good Submission Practice
To strengthen the performance, predictability, and transparency of regulatory agencies through the implementation or enhancement of GRevP and quality measures stepwise in each interested APEC economy	To enhance the quality and efficiency of the medical product registration process by improving the quality of submission as well as its management



## Regulatory Convergence

#### **RHSC** definition

- Regulatory convergence represents a voluntary process
  whereby the regulatory requirements across economies
  become more similar or "aligned" over time as a result of the
  gradual adoption of internationally recognized technical
  guidance documents, standards and scientific principles
  (harmonization) and common or similar practices and
  procedures.
- It does not represent the harmonization of laws and regulations, which is not necessary to allow for the alignment of technical requirements and for greater regulatory cooperation.



## Specific Activities and Timeframe of the GRM Roadmap

Step 1 (2011-2012)

#### Gap Analysis Survey for Setting the Foundation for Stepwise GRevP Implementation

- Set up a technical working group
- Gap analysis survey for APEC economies
- Prioritize needs and strategy for improvement based on result of the gap analysis survey

Step 2 (2011-2016)

#### Planned Solution to Address Gap in GRM

- Training: workshops and CoE Pilot Training Program
- Development of normative GRevP/GSubP documents
- Dissemination of GRevP, GSubP and GRM
- Establish a network of GRevP and a network of GSubP

Step 3 (2017-2019)

#### Assessing the Impact of GRM

- Assessing the Impact of Training and Implementation of GRevP, GSubP and GRM
- Dissemination of GRevP, GSubP and GRM (continued)

Each economy should address its needs and adopt its own best practices based on its resources and environment.

Step 4 (2018-2020)

## Reaching the Goal for Implementing GRM

Follow-up measures and final assessment

To reach the same end: better functioning agency through regulatory convergence by 2020

## **Key Outcomes from Step 1**

## Step 1

## Step 2

## Step 3

## Step 4

#### 2011-2012

Gap Analysis Survey for setting the foundation for Stepwise GRevP Implementation



Gap analysis published (2013)

#### 2011-2016

Planned solutions to address gaps
GRM CoE Pilot

#### 2017-2019

Assessing impact of GRM using Performance indicators

#### 2018-2020

Reaching the Goal for Implementing GRM



## Gap analysis survey for good review practices

## Gap Analysis for GRevP in APEC

- CIRS conducted a gap analysis survey among regulatory agencies of 14 APEC member economies in 2011-2012.
- **Questions:** agency characterization, good review practices, timeliness, transparency, quality, predictability

# Status of GRevP implementation in 2012

- The majority established GRevP. Most practice are evolving and are applied on an **informal basis**.
- Most agencies have developed **SOPs and guidelines** and **use a variety of training methods**.

## Identified training needs

- Use of assessment templates or frameworks
- Implementation of GRevP
- How to develop and improve SOP

# Advantages of a common review process

- Build **trust and confidence** in agency's processes
- Setting the stage for the possibility of work sharing
- Bringing consistency and transparency to review process

Liu L-L et al. Therapeutic Innovation & Regulatory Science, November 2013; vol. 47, 6: pp. 678-683.



## Key Outcomes from Step 2

## Step 1

## Step 2

## Step 3

## Step 4

#### 2011-2012

Gap Analysis Survey for setting the foundation for Stepwise GRevP Implementation



**2011 APEC GRevP Workshop** 



2012 APEC GRevP Workshop

#### 2011-2016

Planned solutions to address gaps
GRM CoE Pilot

GSubP PWA endorsed (2014)



GRevP Guidelines (2015)



GSubP Guidelines (2016)

GRM Roadmap endorsed (2016)

#### 2017-2019

Assessing impact of GRM using Performance indicators

#### 2018-2020

Reaching the Goal for Implementing GRM

#### **APEC GRM Training Activities**

#### 1. TFDA/RAPS (CoE)

- 2016 pilot (Nov 2016, Taipei)
- 2017 workshop (Oct 2017, Taipei)
- 2018 workshop (Sep 2018, Taipei)

#### 2. COFEPPRIS (pilot CoE)

• 2017 pilot (Jun 2017, Mexico City)

#### 3. Local Training

- 2017: Singapore
- 2018: Taiwan, Thailand, Malaysia



## Topics Discussed in the 2011 and 2012 GRevP Workshops

2011 Basic Workshop	2012 Advanced Workshop
<ul> <li>A. The Basics <ol> <li>Common Understanding of GRee</li> <li>Industry's role, responsibilities</li> </ol> </li> <li>B. The Details <ol> <li>Reviewer Competencies</li> <li>Reviewer Training</li> <li>Templates and Procedures</li> </ol> </li> <li>C. Metrics <ol> <li>Information Resources</li> <li>Use of Peer Review</li> <li>Use of External Experts</li> <li>Transparency &amp; Information Sha</li> </ol> </li> <li>E. Recommendations and Final Rem</li> <li>Good Review Practices on Medical Products</li> <li>Industry Responses</li> <li>Panel Discussion</li> </ul>	<ul> <li>B. Quality System for Reviewers</li> <li>C. Key Elements &amp; Strategies of a Good Review</li> <li>D. Critical Thinking and Decision Making: <ul> <li>Drugs and Devices</li> </ul> </li> <li>E. Transparency and Interactions: With the Public, Industry/Other <ul> <li>Stakeholders and Regulatory</li> <li>Authorities</li> <li>F. Conclusion</li> </ul> </li> </ul>

<sup>•</sup> Lin H-Y et al. Therapeutic Innovation & Regulatory Science, November 2015; vol. 49, 4: pp. 483-492.



<sup>•</sup> https://www.fda.gov.tw/EN/site.aspx?sid=3309

## Literature survey for good submission practices

- GSubP: Several articles addressed the issue of quality of application submissions
  - Indicate necessity of promotion of GSubP by applicants & GRevP by regulatory authorities



- Independent Evaluation of FDA's First Cycle Review Performance Retrospective Analysis Final Report. January 2006 (by Booz Allen Hamilton Inc.)
- □ Characterizing Good Review Practices: A Survey Report Among Agencies of APEC Member Economies. TIRS 47(6) 678-683, 2013
- Building Quality into Regulatory Activities: What does it mean? June 2006 (by CMR International

## **Endorsement of GRevP and GSubP Guidelines**

#### **GRevP Guidelines (WHO, 2015)**

Table of Contents

- 1. Introduction
- 2. Glossary
- 3. Principles of a good review
- 4. Managing the review
- 5. Communications
- 6. Review personnel
- 7. Conducting the review

Bibliography

http://apps.who.int/medicinedocs/en/d/Js21902en/

#### **GSubP Guidelines (APEC RHSC, 2016)**

Table of Contents

- 1. INTRODUCTION
- 2. PRINCIPLES OF A GOOD SUBMISSION
- 3. MANAGEMENT OF SUBMISSION
- 4. COMMUNICATIONS
- 5. COMPETENCY AND TRAINING
- 6. GLOSSARY
- 7. REFERENCE

http://apac-

asia.com/images/achievements/pdf/5th/2\_APEC\_RHS C%20Endorsed%20GSubP%20Guideline.pdf

#### These 2 documents serve as:

- Guidelines for regulatory authorities conducting application review and industries conducting application submission
- Basis for the APEC GRM Roadmap champions to develop training objectives and core curriculum

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## **Training Objectives**

## **Principles**

 The principles of Good Review Practices (GRevP) and Good Submission Practices (GSubP)

## Good Review

- What is needed for regulators to accomplish good review
  - Conducting and managing the review
  - Good communication with applicants
  - Competency for regulators

### Good Submission

- What is needed for applicants to accomplish good application
  - Planning and preparation of application dossier
  - Good communication with regulators
  - Competency for applicants



## **Core Curriculum**

**GRM**Good Registration Management



- Basic concept of GRM
- An Overview of Good Review
- An Overview of Good Submission
- Effective Communication for GRM
- Competency & training
- Rolling out the GRM training program in each economy

**GRevP** 

**Good Review Practices** 



**Reviewers-Specific Sessions** 

- Managing the review an Overview
- Communication : Fundamentals and Case Studies
- Review personnel Critical thinking
- Conducting the review

**GSubP** 

**Good Submission Practices** 



**Applicants-Specific Sessions** 

- Planning of Application
- Preparation of application dossier / Practice : How to prepare application dossier
- Effective communications
   Focusing follow-up actions
   during review period



## Hosting 2016 pilot workshop and endorsement of full CoE



Date: November 15-17, 2016

Venue: Chang Yung-Fa Foundation, Taipei

#### **Co-organizers:**













Participating economies (17): Chile, China, Hong Kong China, Indonesia, Japan, Korea, Malaysia, Mexico, Papua New Guinea, Peru, Philippines, Singapore, Chinese Taipei, Thailand, Viet Nam, USA, and UK

Endorsement of full CoE: In February 2017, TFDA/RAPS were endorsed as a formal CoE by APEC LSIF-RHSC.

## Program of 2016 GRM CoE Pilot Workshop

Day 1	Day 2		Day 3	
Common Sessions  Basic concept of GRM	Reviewer Sessions  Managing the review – an Overview	Applicant Sessions  Planning of Application	Reviewer Sessions  Review personnel – Critical thinking	Applicant Sessions  Effective communications - Focusing
An Overview of Good Review	Communication: Fundamentals	Preparation of applicant dossier/ Practice:	Conducting the review	follow-up actions during review period
An Overview of Good Submission  Case study: Effective	and Case studies	How to prepare application dossier	Rolling out the GRM training program in each economy	Rolling out the GRM training program in each economy
Communication for GRM			Common Session  Panel discussion: C  Training	Competency and

http://www.raps-in-taiwan.org.tw/apec/index.html



## Hosting 2017 APEC GRM CoE Workshop



Date: October 30 – November 2, 2017

Venue: NTU Hospital International Convention Center, Taipei

#### **Co-organizers:**















**Participating economies (14):** Canada, Hong Kong China, Indonesia, Japan, Korea, Malaysia, Papua New Guinea, Philippines, Singapore, Chinese Taipei, Thailand, Viet Nam, USA, and UK



## 2017 APEC GRM CoE Workshop Photos



## Program of 2017 GRM CoE Workshop

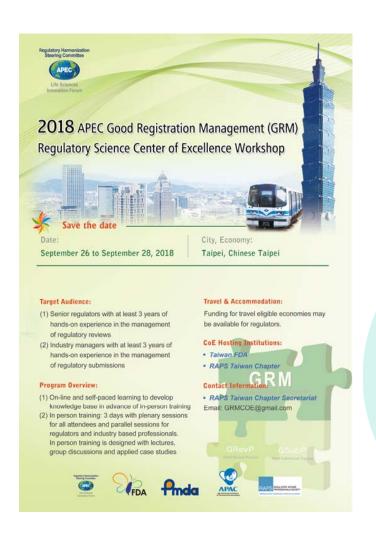
Da	y 1	Da	y 2	Day 3
Common Sessions		<u>Reviewer</u>	<u>Applicant</u>	<u>Common</u>
Keynote speech: B GRM	asic Concept of	Sessions  Review	Preparation of	<u>Sessions</u> Communication
Overview of Good Submission	Review/	personnel – Critical thinking (new drug vs. generic drug	application dossiers  Communication	-Practices and interactive discussions between
Experience sharing from different APEC member economies		applications)	during review period	reviewers and applicants
Reviewer Sessions  Managing & Conducting the	Applicant Sessions  Planning of application	Communication: Fundamentals & Case studies		Competencies and training for reviewers and applicants
review (new drug vs. generic drug applications)	Good Submissions for Generic Drug Applications			Rolling out the GRM in each economy

## Summary of Feedback for 2017 Workshop

- Basically, most sessions have good satisfactions.
- Suggestions for workshop organizers are summarized as follows:
  - Include <u>regional examples of GRM implementations</u> and discuss on the <u>challenge</u>
  - More training in <u>communications</u> and <u>critical thinking</u>
  - Provide more <u>case studies</u> and <u>interactive discussions</u>
  - Not only use the case of drugs, but also include <u>other</u> <u>medical products</u>
  - Give enough time for delegates to prepare their experience sharing



## 2018 APEC GRM CoE Workshop



#### Date:

September 26 to September 28, 2018

#### Agenda:

This workshop will include reviewer sessions, applicant sessions and combined sessions.

#### **Target Audience:**

Senior regulators or industry managers with at least 3 years of hands-on experiences in the management of regulatory reviews or regulatory submissions

http://www.raps-in-taiwan.org.tw/2018CoE/index.html



## Program of 2018 GRM CoE Workshop (draft)

Day 1	Da	Day 3	
Common Sessions	Reviewer Sessions	Applicant Sessions	Common Sessions
Introduction of GRM  Experience sharing from different APEC member economies	Managing & Conducting the review  Critical thinking and Regulatory Decision Making Case studies in generic	Planning of applications	Comprehensive exercises in GRM  Preparation and submission of labeling Review of labeling Case studies and
	drugs (1 case on CMC)		practices
Common Sessions	Reviewer Sessions	Applicant Sessions	Common Sessions
Communication	Critical thinking and Regulatory Decision Making Case studies in generic drugs and BE (1 case on BE)  Case studies in biosimilar (1 case)	Preparation of Application Dossier/ Practice: How to Prepare Application Dossier	Competencies and training for reviewers and applicants  Rolling out the GRM Training Program in each economy

## **Current Focus**

## Step 1

## Step 2

## Step 3

## Step 4

#### 2011-2012

Gap Analysis Survey for setting the foundation for Stepwise GRevP Implementation

#### 2011-2016

Planned solutions to address gaps
GRM CoE Pilot

#### 2017-2019

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#### 2018-2020

Reaching the Goal for Implementing GRM

**Dissemination** of GRM (continued)

- Train-the-trainer by APEC CoE
- Local training by each economy

Assessing the impact of GRM

- Understanding the current status and challenges
- Developing performance indicators and assessing the impact



## Performance Indicators for GRM

Measurable outcomes in different aspects of GRM

**GRevP** 

- Reviewer Competency and Training
- Use of Templates and Procedures
- Transparency, Consistency, Predictability and Timeliness

- Applicants Competency and Training
- Quality of Submission

GSubP



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## Summary (1)

- GRM is the concept to promote GRevP and GSubP cooperatively
- Objective of GRM: To enhance quality and efficiency of overall medical product registration process
- Goal of GRM: To benefit the patients with timely access of medicinal products of safe, efficacious and good quality
- Guidelines for GRevP and GSubP have been developed to provide high-level guidance on the principles and processes of good review and submission



## Summary (2)

- APEC GRM CoE serves as a platform for promoting regulatory convergence, capacity and cooperation in the topic area of GRM. The focus of convergence would be in science and best practices.
- Relevant resources to promote GRM may include the followings:
  - Guidelines
  - Training program, materials and trainers
  - Documented best practices and quality management
  - Information sharing platform





