SOPP 8214: INTERACT Meetings with Sponsors for Drugs and Biological Products

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I. Purpose

A. This Standard Operating Policy and Procedure (SOPP) serves as a guide for the Center for Biologics Evaluation and Research (CBER) staff for scheduling and conducting CBER **IN**itial **T**argeted **E**ngagement for **R**egulatory **A**dvice on CBER Produc**T**s (INTERACT) meetings between CBER representatives and regulated industry and/or individual sponsor-investigators to provide preliminary informal non-binding consultation at an early stage of development on issues that do not yet rise to the pre-IND meeting phase.

II. Scope

A. This SOPP applies to all CBER regulated products.

B. This SOPP does not cover formal regulatory meetings for products under Investigational New Drug (IND), Abbreviated/New Drug Application (A/NDA), Biologics License Application (BLA), amendments and supplements. See *SOPP 8101.1: Regulatory Meetings with Sponsors and Applicants for Drugs and Biological Products*.

C. This SOPP does not cover formal device meetings that fall under the Pre-Submission Program for medical devices (refer to the Guidance for Industry and Food and Drug Administration Staff – *Requests for Feedback on Medical Device Submission: The Pre-Submission Program and Meetings with Food and Drug Administration Staff* (September 29, 2017).

III. Background

A. Development of innovative investigational products can introduce unique challenges related to unknown safety profiles, complex manufacturing technologies and issues, incorporation of innovative devices, and the use of cutting-edge testing methodologies.

B. Through an INTERACT meeting, sponsors can obtain initial, non-binding advice from FDA regarding chemistry, manufacturing and controls, pharmacology/toxicology, and/or clinical aspects of the development program. This informal meeting can: 1) assist sponsors conducting early product characterization and preclinical proof-of-concept studies; 2) initiate discussion for new delivery devices; 3) inform sponsors about overall early-phase clinical

trial design elements; and 4) identify critical issues or deficiencies for sponsors to address in the development of innovative products.

C. An INTERACT meeting is not intended to take the place of a pre-IND meeting, which occurs before the submission of an IND to discuss the scope and design of planned initial studies, design of animal studies needed to support human clinical testing, and the format for the IND. Conversely, an INTERACT meeting also is not a venue to provide advice to sponsors who have yet to initiate any product development activities. Before requesting an INTERACT meeting, a sponsor needs to have selected a specific investigational product or a product-derivation strategy to evaluate in a clinical study.

IV. Definitions

A. Sponsor - for the purposes of this SOPP, is an individual, pharmaceutical company, governmental agency, academic institution, private organization, or other organization who requests an INTERACT meeting to address questions they have when in the process of developing a biological product, drug or device regulated by CBER.

B. INitial **T**argeted **E**ngagement for **R**egulatory **A**dvice on CBER produc**T**s **INTERACT meetings -** an informal non-binding consultation with the Center for Biologics Evaluation and Research (CBER) at an early stage of product development to address issues in advance of a future pre-IND meeting.

V. Policy

A. General

1. INTERACT meetings are intended for novel products that introduce unique challenges due to unknown safety profiles resulting from complex manufacturing technologies and issues, incorporation of innovative devices, and the use of cutting-edge testing methodologies. They are not a prerequisite to requesting a pre-IND meeting.

2. The sponsor of an INTERACT meeting is expected to have reviewed this SOPP in preparation for submission of the meeting request and meeting package. CBER will refer all inquiries regarding formal meetings to *SOPP 8101.1: Regulatory Meetings with Sponsors and Applicants for Drugs and Biological Products* or to the Guidance for Industry and Food and Drug Administration Staff – *Requests for Feedback on Medical Device Submission: The Pre-Submission Program and Meetings with Food and Drug Administration Staff (September 29, 2017),* as appropriate.

3. In accordance with 21 CFR 10.65(e) and FDA policy, meetings with sponsors and applicants may not be electronically recorded.

4. INTERACT meetings are informal communication that are held based upon the availability of CBER resources. Although no formal performance goals are set, CBER will endeavor to schedule INTERACT meetings within 21 calendar days and hold the meeting within 90 calendar days of receipt of the request. INTERACT meetings will be held as teleconference only, generally for one hour.

5. For FDA to send regulatory information via email, the email must be sent to a secure email partner, to allow FDA to digitally sign and encrypt the message. Requests to establish secure email with FDA should be sent to SecureEmail@fda.hhs.gov. Adequate time should be allotted for secure email set-up before expecting email responses from FDA.

B. Meeting Request and Meeting Package

1. Meeting requests and packages are submitted to CBER by email to INTERACT-CBER@fda.hhs.gov.

2. The cover letter and email subject line should be clearly marked as a request for an INTERACT meeting and identify the CBER Office where the request is directed. Sponsors are encouraged to define in the meeting request the specific areas of input requested from CBER. The questions submitted to CBER within a single meeting request should be limited to those that can be reasonably answered within the allotted meeting time, taking into consideration the complexity of the questions considered.

3. Meeting packages for INTERACT meetings are to be submitted with the meeting request. Meeting packages are expected to be succinct and should not exceed 50 pages. The INTERACT meeting package must include the following:

    a. A description of the product and disease or condition being treated or prevented.

    b. A summary of information about the product development to date and future development plans, if appropriate.

    c. A brief statement summarizing the purpose of the meeting.

    d. A list of questions for discussion, grouped by topic, with a summary for each question to explain the need or context for the question. Questions regarding combination products should be grouped together.

    e. A summary of data to support discussion organized by topic and question.

f. A list of all participants, with their titles and affiliations, who will attend the meeting from the sponsor's organization, including consultants and interpreters.

g. The sponsor may also include suggested dates and times (e.g., morning or afternoon) for the meeting. Non-availability dates and times should also be included. The suggested timeframes will only be considered within the context of CBER resource availability.

C. Scheduling the Meeting

1. INTERACT meetings will generally be scheduled within 21 calendar days of receipt of the meeting request and be held within 90 calendar days of request receipt subject to the availability of CBER resources. INTERACT meetings will be held as teleconference only generally for one hour. Regulatory template *T 820.03: Meeting Confirmation* will be used to confirm the logistics of the meeting once scheduled.

D. Reasons a Meeting may not be Held

1. The request for a meeting may be **denied.** Denials will be based on a substantive reason, not merely on the absence of a minor element of the meeting request or a minor element of the meeting package. If a meeting request is denied, the sponsor will be given a reason for the denial. Regulatory Template *T 820.07: Meeting Denied* will be used to convey to the sponsor the reasons for the denial. Examples of reasons for denial include:

a. The requested feedback is not appropriate for an INTERACT meeting. See appendix A for examples of topics or questions that are outside the scope for CBER INTERACT meetings.

b. The stage of development is either premature or too advanced for an INTERACT meeting. CBER will generally inform the sponsor if a different meeting type is more appropriate.

c. A previous meeting for the same purpose has already been held and no substantially new information has become available.

d. The requested feedback is not appropriate for a meeting with CBER.

2. The meeting may be **rescheduled** by CBER and a new date immediately identified. Regulatory Template *T 820.08: Meeting Rescheduled/Change in Meeting Format* will be used to confirm the logistics of the meeting once rescheduled. Examples of reasons for rescheduling a meeting include:

a. The sponsor asked to reschedule the meeting and a new date is immediately identified.

b. Additional consult reviewers or management input is needed but cannot be obtained prior to the original meeting date.

c. Required CBER attendees become unexpectedly unavailable and appropriate substitutes cannot be identified.

3. The meeting may be **canceled** by the sponsor by sending written notification to CBER. Upon receipt of written notification, CBER will confirm cancelation using Regulatory Template *T 820.09: Meeting Cancelation*. Examples of reasons a sponsor may cancel the meeting include:

a. The sponsor is satisfied with the CBER INTERACT comments and cancels the meeting.

b. The sponsor asks to cancel the meeting for any other reason.

E. CBER INTERACT Comments

1. CBER may send responses to the sponsor's questions contained in the meeting package before the meeting to facilitate the discussion. No additional questions from the sponsor will be accepted, and the meeting discussion will be limited to the initial questions submitted in the meeting package.

F. Meeting with Sponsor

1. Discussions during INTERACT meetings with the sponsor will focus on the questions submitted in the original meeting package. The sponsor may cancel the meeting if CBER comments are sent before the meeting and the sponsor does not desire further discussion. CBER will not encourage the cancelation of INTERACT meetings. CBER will also not accept any changes or additions to the questions in the original meeting package.

G. Meeting Minutes

1. CBER advice given during INTERACT meetings is informal and non-binding. Therefore, official meeting minutes will not be issued to the sponsor.

2. Sponsor's meeting minutes

a. In accordance with 21 CFR 10.65(f), the sponsor, or other meeting participant, may prepare and submit to CBER a memorandum summarizing their understanding of issues discussed at the meeting. Since INTERACT meetings are informal and non-binding,

this memorandum, if provided, will not be reviewed by CBER in any manner, no evaluation will be performed to see if the memorandum is accurate. Sponsor meeting minutes do not alter CBER's pre-meeting comments provided in writing or by verbal communication and they are not the official minutes of the meeting.

VI. Responsibilities

A. Document Control Center (DCC) – Processes all incoming meeting requests and meeting packages, including loading electronic submissions into CBER's Electronic Document Room (EDR).

B. INTERACT Triage Group – Monitors, retrieves and initially processes meeting requests submitted to the INTERACT-CBER@fda.hhs.gov email inbox. Responsibilities include assessing requests for appropriate office assignment, forwarding requests to Office Management for evaluation and scheduling, and to DCC for initial data entry into CBER's systems.

C. Office Management – Supervisory chain, including Division Directors or designees, within a Division that evaluates the meeting request and makes the decision on whether to hold the meeting; participates in the evaluation of the meeting package; participates in the meeting; and works with the Review Committee as necessary.

D. Regulatory Information Specialist (RIS) – Coordinates with the RPM to schedule and organize INTERACT meetings with sponsors.

E. Regulatory Project Manager (RPM) – Overall management of the meeting request. These responsibilities include: reviewing assigned sections, ensuring the requested meetings are scheduled; ensuring regulatory and administrative actions are completed on time, including all notifications to sponsor are sent; performs quality control checks; ensures all communications are entered in the appropriate regulatory database/system and imported into CBER's Electronic Document Room (EDR); and ensures the file is administratively complete.

F. Review Committee Member - Reviews meeting requests and packages, provides comments, as applicable, and participates in CBER INTERACT meetings.

VII. Procedures

A. Processing an INTERACT Meeting Request

1. INTERACT meeting requests shall be received via submission to the INTERACT-CBER@fda.hhs.gov email address:

    a. Forward the meeting request to DCC for submission logging. **[INTERACT Triage Group]**

b. Process electronic submissions and notify the appropriate Office per *DCC Procedure Guide 22: Procedure for Processing, Routing and Storing Electronic Submissions*. **[DCC]**

c. Upon receipt of notification from DCC, ensure that the necessary information is entered into the Biologics Information Tracking System: Pre-Application Tracking Module (BITS-PTS). **[RIS]**

2. Evaluate the initial request for completeness and appropriateness for an INTERACT meeting based upon the INTERACT meeting criteria listed in Appendix A of this SOPP. **[Office Management]**

3. Make the decision on whether the meeting will be held. **[INTERACT Triage Group/Office Management]**

4. Notify the sponsor of CBER's decision within the timeline set in meeting management procedural goals table (see Table 1 in Appendix A). **[INTERACT Triage Group, RPM, RIS]**

a. If the meeting is denied, notify the sponsor that the meeting request is denied using regulatory template *T 820.07: Meeting Denied*. **[INTERACT Triage Group]**

b. If the meeting is granted, notify the sponsor using regulatory template *T 820.03: Meeting Confirmation.* **[RPM]**

B. Evaluation of Meeting Package and Preparation of CBER INTERACT Comments

1. Evaluate whether all appropriate disciplines and participants have been included and request additional disciplines as necessary. **[RPM]**

2. Review the meeting package and prepare optional CBER INTERACT comments. Comments, if prepared, should be sent to the sponsor no later than one calendar day prior to the meeting. **[Review Committee Members, Office Management as appropriate]**

3. If a request to cancel the meeting is received from the sponsor, acknowledge the request using Regulatory Template *T 820.09: Meeting Cancelation*. and notify all appropriate Agency personnel. **[RPM]**

C. Meeting with the Sponsor

1. Conduct the meeting. **[RPM/Review Committee/Office Management]**

2. Notify sponsor that meeting minutes will not be sent because INTERACT meetings are informal in nature. **[RPM/Review Committee/Office Management]**

3. Notify sponsor that any meeting minutes they prepare and send to CBER will not be reviewed in any manner, no evaluation will be performed to see if they are accurate. Remind them that sponsor meeting minutes do not CBER's pre-meeting comments provided in writing or by verbal communication and they are not the official minutes of the meeting. **[RPM/Review Committee/Office Management]**

VIII. Appendix

A. INTERACT Meeting Information

IX. References

A. References below are CBER Internal:

1. T 820.03: Meeting Confirmation
2. T 820.07: Meeting Denied
3. T 820.08: Meeting Rescheduled/Change in Meeting Format
4. T 820.09: Meeting Cancelation
5. DCC Procedure Guide 22: Procedure for Processing, Routing and Storing Electronic Submissions

B. References below may be found on the Internet:

1. SOPP 8101.1: Regulatory Meetings with Sponsors and Applicants for Drugs and Biological Products
2. Requests for Feedback on Medical Device Submission: The Pre-Submission Program and Meetings with Food and Drug Administration Staff (September 29, 2017)
3. INTERACT Meeting Information

X. History

Written/ Revision	Approved	Approval Date	Version Number	Comment
RMCC	Christopher Joneckis	September 28, 2018	1	Original Document

SOPP 8214 Appendix A: INTERACT Meeting Information

I. INTERACT Meeting Criteria and Examples

Note: CBER advice for INTERACT meetings is informal non-binding advice.

A. Consultation on issues that a sponsor needs to address such as choice of appropriate preclinical models or necessary toxicology studies.

B. Occasions when development of innovative investigational products introduces new safety concerns due to the unknown safety profiles resulting from the use of complex manufacturing technologies, innovative devices, or cutting-edge testing methodologies.

C. Examples of questions and topics **within the scope** of an INTERACT meeting:

1. Chemistry, Manufacturing and Controls (CMC)

a. Innovative technologies for the qualification of new cell substrates.

b. Product-manufacturing (e.g., cell sources, donor eligibility determination for allogenic cellular products and qualification of international donors).

c. Product dependent and manufacturing process dependent reagents, starting materials and critical product components.

d. Qualification of a novel delivery device related to a specific investigational product.

e. Discussion of complex software issues and strategies to support device use in clinical studies.

2. Pharmacology/Toxicology

a. Overall advice related to the design of proof-of-concept or other pilot safety/biodistribution studies necessary to support administration of an investigational product in a first-in-human clinical trial.

b. Specific questions on the adequacy of the selected animal models; study design (e.g., endpoints, dose levels, route of administration, dosing regimen); and acceptability of innovative preclinical testing strategies, products and/or delivery modalities.

c. Advice on modification of a preclinical program or study design, as applicable, to ensure judicious use of animals.

3. Clinical

a. General recommendations regarding a future first-in-human trial in a target clinical population. These recommendations may vary based on scientific knowledge about the disease and regulatory experience with the disease.

4. Cross-cutting/Other

a. Provide recommendations regarding the approach for further development of an early stage product for which limited CMC, pharmacology/toxicology and/or clinical data were collected outside of a U.S. IND.

5. BLA Device

a. Provide recommendations regarding complex software issues or analytical performance requirements to developers of innovative blood screening devices regulated as BLAs by CBER.

D. Examples of questions and topics **outside the scope** of INTERACT meetings:

1. Chemistry, Manufacturing and Controls

a. Questions about candidate product selection for further development (including circumstances where the sponsor has not decided between multiple product options or the investigational product has not been identified).

b. Situations in which the sponsor previously has received formal regulatory advice about a similar product and indication.

2. Pharmacology/Toxicology

a. Questions regarding the adequacy and design of definitive toxicology studies. Agency input on the design of definitive preclinical toxicology studies occurs in the context of pre-IND meetings.

b. Pre-review of completed proof-of-concept or toxicology studies. Reviews of the final study reports for the completed studies occurs in the setting of IND submissions.

c. Questions regarding a preclinical testing plan where no preliminary data from pilot studies are provided.

3. Clinical

a. Routine questions regarding specific aspects of clinical study protocol design, such as inclusion and exclusion criteria. (Review of clinical study designs or protocols occurs in the context of pre-IND submissions.)

II. Meeting Management Procedural Goals

Table 1: Summary of Meeting Management Procedural Goals

Meeting Type	FDA's Response to Request	FDA's Receipt of Meeting Package	FDA's Comments to Sponsor (if applicable)	Sponsor's Response to FDA's INTERACT Comments (not applicable to WRO)	FDA's Scheduled Meeting Date (days from receipt of request)	FDA's Meeting Minutes to Sponsor (if applicable)
INTERACT	21 calendar days	With meeting request; WRO not applicable for these meetings	No later than 1 calendar day before meeting (optional)	No changes to the original questions will be accepted; may cancel prior to the meeting at sponsor's request	Within 90 calendar days (subject to availability of CBER resources)	N/A

Additional notes:

- Email subject line and cover letter should clearly identify the meeting request is for an INTERACT meeting and identify the CBER Office where the request is directed.