

**CENTER FOR DRUG EVALUATION AND
RESEARCH**

APPLICATION NUMBER:
201023

OTHER REVIEW(S)

Attachment B: Sample PMR/PMC Development Template

This template should be completed by the PMR/PMC Development Coordinator and included for *each* PMR/PMC in the Action Package.

PMR/PMC Description: PMR 1649-1: To evaluate the potential for a serious risk of intravenous infusion of particulate matter into the blood stream, it is necessary to better understand and characterize the supersaturated pre-mix. Conduct a study to provide data which address particulate nucleation and kinetic factors of precipitation in the pre-mix. Conduct this study using multiple samples drawn from multiple batches so as to more fully support an in-use life of the pre-mix. Study considerations include (but are not necessarily limited to); interior surface properties of the container closure (e.g., treatments, roughness, scratches, etc.), initial mixing agitation force (vigorous shaking), physical shock on standing (e.g., vigorous shaking during in-use storage), needle sticks, syringe use, temperature (and temperature changes during in-use storage), and additional time point sampling beyond the proposed duration of in-use storage of the pre-mix solution (e.g., 1 to 4 hours). Collect and provide photographs of the precipitate as it appears in the container and isolated photomicrographs of the particles, as feasible, in the final report. Provide by mass balance, the mass of precipitated drug as precipitated mass and as mass percent of the total cabazitaxel content, in the final report.

PMR/PMC Schedule Milestones:	Final protocol Submission Date:	<u>September 2010</u>
	Study/Clinical trial Completion Date:	<u>March 2011</u>
	Final Report Submission Date:	<u>June 2011</u>
	Other:	<u>MM/DD/YYYY</u>

1. During application review, explain why this issue is appropriate for a PMR/PMC instead of a pre-approval requirement. Check type below and describe.

- Unmet need
- Life-threatening condition
- Long-term data needed
- Only feasible to conduct post-approval
- Prior clinical experience indicates safety
- Small subpopulation affected
- Theoretical concern
- Other

2. Describe the particular review issue and the goal of the study/clinical trial. If the study/clinical trial is a FDAAA PMR, describe the risk. If the FDAAA PMR is created post-approval, describe the “new safety information.”

The concentration of cabazitaxel in the first dilution pre-mix solution (e.g., 10 mg/mL) is super saturated (b) (4) exceeding the solubility in the pre-mix vehicle by (b) (4). Nucleation and kinetic factors are critical in that they will largely determine the duration that this desired but thermodynamically unstable pre-mix solution will persist. The database you have provided to support the one-hour physical in-use stability (i.e., no precipitation) is inadequate.

3. If the study/clinical trial is a **PMR**, check the applicable regulation.

If not a PMR, skip to 4.

- **Which regulation?**

- Accelerated Approval (subpart H/E)
 Animal Efficacy Rule
 Pediatric Research Equity Act
 FDAAA required safety study/clinical trial

- **If the PMR is a FDAAA safety study/clinical trial, does it: (check all that apply)**

- Assess a known serious risk related to the use of the drug?
 Assess signals of serious risk related to the use of the drug?
 Identify an unexpected serious risk when available data indicate the potential for a serious risk?

- **If the PMR is a FDAAA safety study/clinical trial, will it be conducted as:**

- Analysis of spontaneous postmarketing adverse events?
Do not select the above study/clinical trial type if: such an analysis will not be sufficient to assess or identify a serious risk
- Analysis using pharmacovigilance system?
Do not select the above study/clinical trial type if: the new pharmacovigilance system that the FDA is required to establish under section 505(k)(3) has not yet been established and is thus not sufficient to assess this known serious risk, or has been established but is nevertheless not sufficient to assess or identify a serious risk
- Study: all other investigations, such as investigations in humans that are not clinical trials as defined below (e.g., observational epidemiologic studies), animal studies, and laboratory experiments?
Do not select the above study type if: a study will not be sufficient to identify or assess a serious risk
- Clinical trial: any prospective investigation in which the sponsor or investigator determines the method of assigning investigational product or other interventions to one or more human subjects?

4. What type of study or clinical trial is required or agreed upon (describe and check type below)? If the study or trial will be performed in a subpopulation, list here.

Required

- Observational pharmacoepidemiologic study
- Registry studies

Continuation of Question 4

- Primary safety study or clinical trial
 - Pharmacogenetic or pharmacogenomic study or clinical trial if required to further assess safety
 - Thorough Q-T clinical trial
 - Nonclinical (animal) safety study (e.g., carcinogenicity, reproductive toxicology)
 - Nonclinical study (laboratory resistance, receptor affinity, quality study related to safety)
 - Pharmacokinetic studies or clinical trials
 - Drug interaction or bioavailability studies or clinical trials
 - Dosing trials
 - Additional data or analysis required for a previously submitted or expected study/clinical trial (provide explanation)
-
- Meta-analysis or pooled analysis of previous studies/clinical trials
 - Immunogenicity as a marker of safety
 - Other (provide explanation)
-

Agreed upon:

- Quality study without a safety endpoint (e.g., manufacturing, stability)
 - Pharmacoepidemiologic study not related to safe drug use (e.g., natural history of disease, background rates of adverse events)
 - Clinical trials primarily designed to further define efficacy (e.g., in another condition, different disease severity, or subgroup) that are NOT required under Subpart H/E
 - Dose-response study or clinical trial performed for effectiveness
 - Nonclinical study, not safety-related (specify)
-
- Other
-

5. Is the PMR/PMC clear, feasible, and appropriate?

- Does the study/clinical trial meet criteria for PMRs or PMCs?
- Are the objectives clear from the description of the PMR/PMC?
- Has the applicant adequately justified the choice of schedule milestone dates?
- Has the applicant had sufficient time to review the PMRs/PMCs, ask questions, determine feasibility, and contribute to the development process?

PMR/PMC Development Coordinator:

This PMR/PMC has been reviewed for clarity and consistency, and is necessary to further refine the safety, efficacy, or optimal use of a drug, or to ensure consistency and reliability of drug quality.

(signature line for BLAs)

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