A Decade of regulatory harmonization in Africa: Where are we? Where do we go from here?
Outline

What to measure

Why to measure

How to measure
What to measure in the review

Quantitative and Qualitative Measure of the review process

Qualitative (process)
- Good Review Practices
  - Quality of the review
  - Decision making process
  - Benefit risk template
  - Embeddedness (how well are they used by the reviewers)
  - Quality of the submission

Quantitative (metrics)
- Overall time vs components of the review process
- Process categorisation
  - Types of review (Reliance pathways, facilitated pathways)
  - Type of medicine
- Resources
Why to measure?

- To encourage **systematic measuring** of the processes
- To be able to collect metrics data which is **specific** to the regulatory review and assessment **process**
- To compare accurately the processes used in the review of drug marketing authorisations
- To encourage the development of a systematic approach to **self-monitoring** and continuous **improvement**
Why measuring can help improvement initiatives

Provides a **baseline** against which the **impact of change** can be measured

Allow authorities to **assess** their own performance compared to other authorities

**Measurement of impact** of process/structural changes or staff situation

Allow participants to focus their improvement initiatives, set realistic **targets** and facilitate future **strategic planning** and decision-making within the approval process
Mapping the Review Process to Milestones

**Key Milestone Date**

1a. Receipt of the dossier
1b. Acceptance to file
2a. Start of Primary Scientific Assessment
2b. Completion of Primary Scientific Assessment

**Primary Scientific Assessment**

3a. Primary assessment deficiency letter sent to sponsor (if applicable)
3b. Response from Sponsor (if applicable)
4. Secondary assessment following deficiency letter response (if applicable)
5. Succeeding Advisory Committee Review (if applicable)
6. Completion of Scientific Assessment

7. Marketing Authorisation Granted/Rejected

For REC: Final Acceptance by member state

This allows information to be interpreted correctly
### Linking Process Milestones to Metrics

= median; Box: 25\textsuperscript{th} and 75\textsuperscript{th} percentiles; Whiskers: 5\textsuperscript{th} and 95\textsuperscript{th} percentiles.

<table>
<thead>
<tr>
<th>Key Milestone Date</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a. Receipt of the dossier</td>
<td></td>
</tr>
<tr>
<td>1b. Acceptance to file</td>
<td></td>
</tr>
<tr>
<td>2a. Start of Primary Scientific Assessment</td>
<td></td>
</tr>
<tr>
<td>2b. Completion of Primary Scientific Assessment</td>
<td></td>
</tr>
<tr>
<td>Primary Scientific Assessment</td>
<td></td>
</tr>
<tr>
<td>3a. Primary assessment deficiency letter sent to sponsor (if applicable)</td>
<td></td>
</tr>
<tr>
<td>3b. Response from Sponsor (If applicable)</td>
<td></td>
</tr>
<tr>
<td>4. Secondary assessment following deficiency letter response (if applicable)</td>
<td></td>
</tr>
<tr>
<td>5. Succeeding Advisory Committee Review (if applicable)</td>
<td></td>
</tr>
<tr>
<td>6. Completion of Scientific Assessment</td>
<td></td>
</tr>
<tr>
<td>7. Marketing Authorisation Granted/Rejected</td>
<td></td>
</tr>
<tr>
<td>For REC: Final Acceptance by member state</td>
<td></td>
</tr>
</tbody>
</table>

A Decade of regulatory harmonization in Africa: Where are we? Where do we go from here?
Summary of Review Process Timelines

Key Milestone Date

1a. Receipt of the dossier
1b. Acceptance to file
2a. Start of Primary Scientific Assessment
2b. Completion of Primary Scientific Assessment
3a. Primary assessment deficiency letter sent to sponsor (if applicable)
3b. Response from Sponsor (if applicable)
4. Secondary assessment following deficiency letter response (if applicable)
5. Succeeding Advisory Committee Review (if applicable)
6. Completion of Scientific Assessment
7. Marketing Authorisation Granted/Rejected

For REC: Final Acceptance by member state

Does agency request missing documents during validation?

Does this agency do internal only review or use external only or both?

Is there a advisory committee time?

How many rounds of questions?

Pricing steps or admin steps?

Overall approval time (19,7)
Dossier receipt - start of scientific assessment (19, 7)
Agency time only (Scientific assessment) (19, 7)
Company time only (Scientific assessment) (17, 16)
Completion of ALL Scientific Assessment to Notification of Final Decision Sent to Sponsor (19, 7)

(n1) = number of drug applications, (n2) = number of companies
Timeliness and Speed of the review is only one aspect in measuring regulatory performance.

Quality of the process from construction of the dossier to the ultimate regulatory decision must also be considered and measured.
How to understand the Regulatory Review Process

Part 1 - Organisation of the agency
- Information on its structure, organisation and resources.

Part 2 - Types of Review Models
- Explores *review model(s)* for the *scientific assessment of medicines* in terms of the extent to which data is assessed in detail by the agency, and how the agency might rely on the results of assessments and reviews carried out elsewhere.

Part 3 - Key Milestones in the Review Process
- Identify the main steps in the review and approval process and identifies key ‘milestone’ dates in the process. This allows for the analysis of timelines.

Part 4 - Good Review Practices (GRevP): Building quality into the assessment and registration process
- Identity’s the activities that contribute to those measures that have been adopted to improve consistency, transparency, timeliness, and competency in the review processes.

Part 5 – Quality Decision-Making Processes
- Explores the quality of the decision-making process and whether or not the agency has measures in place to ensure that good decisions are made around the data during the registration process.
Q18: GAP Analysis: How important are the activities/functions to build Good Review Practices and how well do you feel these are actually followed:

Agency A – Median Scores

- All parameters were rated 8 or above with regard to importance.
- However there is a perceived gap between how important an activity or function is to have GRPS and how well followed they are actually followed. The gap between the two scores is generally 2-3 points, but for target timelines and Feedback from patients the difference is 3-4 points, respectively.

Key Findings
- The gap between ideal and practice needs to be closed.

Implications
- Is not important/well followed – 10= extremely important/well followed

How Important

How well Followed

<table>
<thead>
<tr>
<th>Parameter</th>
<th>How Important</th>
<th>How well Followed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard operating procedures</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ability to track the review process</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Assessment templates</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Target timelines</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feedback from companies/sponsors</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feedback from Staff/Assessment team</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Feedback from Patients</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Internal Audit Process</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality Policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality Department</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Case Study on how these data can be used - Saudi Arabia – Gap analysis (in collaboration with agency)

Internally utilisation of country report

Gap analysis

Publication recommendations

Introduction to risk stratification routes

**SFDA, TGA, HC and HSA**

<table>
<thead>
<tr>
<th>Country</th>
<th>Regulatory Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Saudi Arabia</td>
<td>Australia</td>
</tr>
<tr>
<td>Feedback to industry on submitted dossier</td>
<td>✓</td>
</tr>
<tr>
<td>Details of technical staff to contact</td>
<td>✓</td>
</tr>
<tr>
<td>Pre-submission scientific advice to industry</td>
<td>✓</td>
</tr>
<tr>
<td>Official guidelines to assist industry</td>
<td>✓</td>
</tr>
<tr>
<td>Industry can track progress of application</td>
<td>✓</td>
</tr>
<tr>
<td>Summary of the grounds on which approval was granted</td>
<td>✓</td>
</tr>
<tr>
<td>Approval times</td>
<td>✓</td>
</tr>
<tr>
<td>Advisory committee meeting status</td>
<td>✓</td>
</tr>
<tr>
<td>Approval of products</td>
<td>✓</td>
</tr>
</tbody>
</table>

- Exploring a risk-stratification approach
- Replacing the requirement for a legalised CPP
- Investigating the separation of pricing negotiations from the review process
- Publishing a Summary Basis of Approval or other document that transparently communicates decisions
- Introducing a feedback process to industry on the quality of the dossier to improve submissions
Optimising Efficiencies in Regulatory Agencies (OpERA)
A Decade of regulatory harmonization in Africa: Where are we? Where do we go from here?

Regulatory strengthening of the review process

**Performance Metrics**
- Understanding where time is spent
- Setting realistic target times
- Documentation (tracking systems)

**Good Review Practices**
- Clear and well defined processes (Key Quality Documentation)
- Consistent Application (Transparent system)
- Talented well trained people (Continual improvement activities)

To encourage the development of a systematic approach to self-monitoring and continuous improvement to better decision making.

A Decade of regulatory harmonization in Africa: Where are we? Where do we go from here?
Optimising Regulatory agencies review processes and performance through standardised systematic measures.

Prisha Patel
Programme Manager, CIRS

A Decade of regulatory harmonization in Africa: Where are we? Where do we go from here?