February 4, 2025

Dockets Management Staff (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm. 1061
Rockville, MD 20852

Submitted electronically via regulations.gov

Re: Expedited Program for Serious Conditions — Accelerated Approval of Drugs and Biologics (FDA-2024-D-2033)

Dear Sir or Madam:

The Academy of Managed Care Pharmacy (AMCP) thanks the Food and Drug Administration (FDA) for the opportunity to provide comments in response to the "Expedited Program for Serious Conditions — Accelerated Approval of Drugs and Biologics" (Draft Guidance), issued on December 5, 2024.

AMCP is the nation's leading professional association dedicated to increasing patient access to affordable medicines, improving health outcomes, and ensuring the wise use of healthcare dollars. Through evidence and value-based strategies and practices, AMCP's nearly 8,000 pharmacists, physicians, nurses, and other practitioners manage medication therapies for the 270 million Americans served by health plans, pharmacy benefit management firms, emerging care models, and government health programs.

Accelerated approval is an important topic for managed care organizations (MCOs). Providing access to medications for patients is vital. Manufacturers and MCOs alike want to provide access to medications to help patients with unmet medical needs as early as possible. At the same time, MCOs need greater certainty about safety and efficacy and may find that available clinical data falls short. MCOs may face financial risk for covering products subject to accelerated approval, especially if these products prove not to be effective.

Accelerated Approval Endpoints

AMCP supports FDA's updated guidance on important factors to consider in assessing whether surrogate endpoints or intermediate clinical endpoints are reasonably likely to predict clinical benefit. However, AMCP cautions that the standard of being "reasonably likely to predict clinical benefit" is subjective and may be open to different interpretations. AMCP believes that the guidance should define clinical significance as a part of the justification for a new biomarker/ surrogate endpoint. The data demonstrating clinical relevance of a novel biomarker needs to be strong and tested in clinical settings. AMCP supports the FDA approach to early consultation on endpoint evaluation procedures. AMCP also believes that FDA should emphasize the value of real-world evidence when planning clinical trials, especially when evaluating new surrogate

endpoints.[1] AMCP encourages FDA to address real world evidence in this guidance as an important contributor for accelerated approval decisions.

Post-approval Confirmatory Trials

AMCP agrees with FDA's guidance on postapproval confirmatory trials and believes it will lead to improved patient safety. Further, AMCP believes that the 180-day progress report timeline set out by the FDA is an important guardrail. However, AMCP is concerned that higher-risk products may need closer monitoring by FDA. FDA's conditions for postapproval studies, including deadlines for protocol submission, enrollment targets, and study completion milestones will help ensure ongoing safety and efficacy of drugs approved under the accelerated pathway. AMCP's members believe that the progress report should include enrollment numbers and preliminary data point cuts. AMCP further recommends a specific deadline for the completion of confirmatory trials. AMCP's members noted that currently, there are accelerated approval drugs that have been on the market for years without published data despite having initiated confirmatory trials.

Other Conditions of Accelerated Approval

AMCP supports FDA's requirement that drug labelling include a description of the limitations usefulness but urges caution about the potential breadth of indications and patient populations which may be included in the labelling.

Withdrawal of Accelerated Approval

When drugs show no clinical benefit or do not meet their clinical study obligations, AMCP supports the use of expedited withdrawal procedures to help improve patient safety. AMCP cautions that public comment periods regarding a proposal to withdraw approval and convening an advisory committee may unnecessarily delay withdrawal, raising patient safety concerns.

Conclusion

AMCP appreciates your consideration of AMCP's concerns and looks forward to continuing work on these issues with FDA. If you have any questions regarding AMCP's comments or would like further information, please contact Vicky Jucelin, AMCP's Manager of Regulatory Affairs, at vjucelin@amcp.org or (571) 858-5320.

Sincerely,

Susan A. Cantrell, MHL, RPh, CAE
Chief Executive Officer

[1] See Emmptt, N; D'Ambrosio, M; Locke, T; and Hendrisks-Sturrup, R. (2024) Applying Real-World Data and Real-World Evidence for Accelerated Approvals and Coverage Decisions. Duke. Margolis Institute for Health policy. Available at https://healthpolicy.duke.edu/sites/default/files/2024-07/RWD%20RWE%20for%20Accelerated%20Approvals%20and%20Coverage.pdf