FDA Cell Selection Point of Care Draft Guidance

Cell Therapy Liaison Meeting
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Comments from ISCT

1. Why is the cell selection devices not manufacturing equipment?
2. Clarification on distance between sites?
   - **Today, many hospital complexes are large and can be located across town**
   - **What if the apheresis center is contracted with the hospital, is this acceptable?**
3. FDA appears to have narrowed the definition of same surgical procedure.
   - **Current regulation only indicates that the cells have to be autologous**
   - **No mention of manipulation or requiring the instruments and equipment has to be labeled for the indication the physician is treating**

Comments from ISCT

4. This guidance does not follow definition of same surgical procedure outlined in other FDA documents
   - **Guidance to Industry Regulation of HCT/Ps Small Entity Compliance Guide**
     - **Indicates that the HCT/P can be stored for several days between recovery and implantation**
     - **No additional manufacturing**
5. Need clarification on manufacturing steps. Is washing, concentration, and formulation a manufacturing step?
6. What is meant by a short period of time? Need clarification on shipping and storage.

Comments from ISCT

7. This guidance establishes two regulatory pathways for market for the same therapeutic.
   - **Device company – use this guidance document, follow device regulations and standards**
   - **Company using a device – can't use guidance, no device to market, must follow biologic/drug regulations and standards**
   - **Differences:**

Devices	Biologic/Drug
Potential for Benefit	Must demonstrate efficacy
No potency standard	Potency
510(k),PMA	BLA
User Fees - lower	User Fees - higher

Comments from ISCT

8. What will be the required device performance characteristics? Will a device company be required to characterize the cells that come off the device and to what level? Equivalent to biological applications?
9. The document indicates that there is no storage of the cells. However, if you fit the criteria of the guidance document should adding DMSO kick you out of the exemption? Adding DMSO is not considered a kick up factor in 1271.
10. Need to clarify more specifically what cell selection technology this document covers.
    - **Cell separation devices could fit this document. However, FDA has generally regulated cell separation devices without clinical data.**
11. Does this document only cover PBSCs? Why not bone marrow or other types of cells?
12. Need to clarify information required for the mobilizing agents?

Comments from ISCT

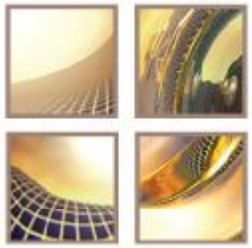
13. Several questions regarding the indications listed in the guidance document.
    - **Are they now considered homologous use by FDA?**
    - **Is the guidance restricted to these uses?**
    - **How does the addition of the use of an unapproved catheter change the regulatory pathway or does it? Currently, delivery of PBSCs to the heart with an unapproved catheter constitutes a combination product.**
14. There are many variables that can influence the outcome of the device such as number of cells in the input source and how long the device is run or processed. How is the device manufacturer to assure that the end-user makes appropriate decisions to ensure that the correct dose of cells is obtained?
15. Effective delivery may be dependent on using an appropriate infusion system. Whose responsibility is it to ensure that appropriate infusion system?

Potential Solutions

- Change the document to include apheresis centers that are under contract with the hospital.
- Change distance to be more reflective of the current environment and rely on some type of shipping validation and data.
- Keep washing, concentration, and formulation as manufacturing steps but define the type of steps that can take place outside the device.
- So as not to create two regulatory pathways, ensure that no matter what the company, the same requirements will be applied to both a device company and a cell therapy company. Don't know if this is legally defensible.
- Harmonize FDA documents and include in this document that storage is allowed for a period of time.

Potential Solutions

- Don't include cell separation devices as part of this guidance
  - **Or**
- Regulate cell selection devices as cell separation devices have been regulated
- Discuss in more detail the type of data particularly with regard to cell characterization data and the type of clinical trial(s).
- Expand document to include all cell types that can be isolated with cell selection devices. Not limit to PBSC.
- Narrowing the definition of "same surgical procedure", need to go through rule making.



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Questions/Discussion

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