The IID – A Historical Industry Perspective and Alternative Options for the Future





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Overview of the presentation

- What is the IID?
- How the IID discussion started
- Past process
- Current process
- Future opportunities Improvements and Enhancements
- Outcome
- Summary



What is the IID?

- The Inactive Ingredients Database (IID) is an FDA database that lists inactive ingredients.
- The IID only provides a list of inactive ingredients that have been approved in an NDA or ANDA drug product formulation by the FDA.
- Once an inactive ingredient has appeared in an approved drug product for a particular route of administration and dosage form, it is not considered new and may require a less extensive review in a new drug product.



How did the IID discussion start?

- Fall of 2011
 - Formation of OGD IID Working Group
 - Data discrepancies
 - UNII Numbers and the Substance Registration System (SRS) Team
 - IPEC-Americas 12/2011 initial meeting
 - OGD/IPEC-Americas Working Group
- Winter of 2011 to 2012
 - Data integrity
 - Completeness
 - Accuracy
 - Misrepresentation



Past process

- Data entry into the Drug Product Reference File aka DPRF
 - Office of Business Informatics
 - Data entry quality controls
- DPRF interface with the IID
 - Office of Generic Drugs Orange Book



Current Process

- Generic Drug User Fee Amendments (GDUFA)
 - New IT platform: Integrity
 - Office of Business Informatics
 - Data entry quality controls
 - Data integrity
 - Completeness
 - Accuracy
 - Misrepresentation



The IID





Future opportunities – Improvements and Enhancements

Improvements:

- Complete
- Accurate
- More representative

Enhancements:

- Maximum daily intake
- Searchable functionality
- Provision for including a listing for common, generic, compendia, cosmetic, brand and trade names, as well as any other synonyms for inactive ingredients
- Family ties



Outcomes

Agency

- Efficient, consistent and timely reviews
- Workload management
 - Technical review process
 - Controlled correspondence
- GDUFA metrics

Industry

- Achieve Agency quality standards
- Increase innovation in product design
- Workload management
 - Controlled correspondence
- Decrease uncertainty



Summary

The Agency must:

- Look beyond the capabilities of what can be done within CDER and the Agency.
- Explore other viable options to address the needs of the Agency and industry.
- Act now.



Thank You