August 23, 2019

RE: Docket No. FDA-2019-N-2012 ("New Drugs Regulatory Program Modernization: Improving Approval Package Documentation and Communication")
https://www.federalregister.gov/d/2019-13751

We are academics and researchers that have used FDA's action packages, today made available on the Drugs@FDA website. We believe it is an important and valuable public resource.

We have used the FDA scientific reviews and other documents contained in action packages in a variety of ways, including:

1. conducting systematic reviews and meta-analyses of medical products, and improving methods[1–13]
2. researching regulatory, publication, and drug approval processes[14–40]
3. comparing regulatory review times and outcomes across jurisdictions[41–44]
4. developing consumer and professional decision making tools and case studies of particular drug approval decisions[45–60]
5. evaluating the impact of federal policy[61–75]

We are writing to express our concern that FDA's decision to replace individual original reviews with a new "integrated review" may decrease the overall value of the Drugs@FDA resource.

The FDA notice states: "This new [integrated] review template would replace the current documentation where each discipline provides a separate application review document."

From the perspective of those outside the FDA, an integrated review in lieu of separate assessments would deprive researchers like us of valuable information and data including:

- Detailed information and data for the clinical studies and trials (both published and unpublished) submitted to FDA, which includes extensive medical and statistical reviews of trial design and conduct, statistical analysis, enrolled participants, and efficacy and safety outcomes.
- Detailed information on the postmarketing requirements, including clinical studies and trials imposed by the FDA, along with postmarketing commitments made by sponsors.
- FDA reviewer concerns with the application that were judged not significant enough to be included in a summary document like the integrated review.
- Sufficient context and granularity of detail to gain a robust understanding of individual FDA reviewer concerns, because a summary document like the integrated review is likely to only provide us with a general sense of the concern among the reviewers.
- Detailed documentation for the reasons a single reviewer might have to support a recommendation that an application is not approved.
- Detailed documentation of any differences of opinion between FDA reviewers.

The FDA should not replace individual reviews with an integrated review. Rather, an additional document that summarizes the individual reviews can be published, as FDA has already been doing in publishing "Summary Review" documents. Improving summary reviews can meet FDA's stated goal of providing the lay and scientific public with "greater clarity on FDA's application review."

Further, it is critical that "integrated reviews" do not run counter to FDA initiatives such as the "Equal Voice" initiative (CDER MAPP 4151.8), which required that dissenting views be kept in the record and that supervisors who overruled reviewers had to fully document their reasons for doing so.[76]

Finally, as researchers many of which have used clinical study reports in our work,[77–96] we wish to express our support for FDA to continue its efforts to release clinical study reports (CSRs). CSRs, written by sponsors, are not made redundant by FDA scientific review documents. Rather, they are complementary.

This letter is written in our capacity as individuals, and our affiliations are for identification purposes only.

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