EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Update on the implementation of the Consultation procedure on Companion Diagnostic (CDx)

R&D platform – 4th June 2021

Presented by Christelle Bouygues / Camille Vleminckx
Human Medicines Division

Overview of steps taken to collaborate with NBs

In 2019, established informal dialogue with IVD Notified Body CDx Working Group (Team NB)

- Held 1 meeting but then no further dialogue due to capacity constraints of NBs and lack of designation according to IVDR

September 2020 - re-vitalisation of IVD Notified Body CDx Working Group

- To continue the work on the role of Notified Bodies in the CDx conformity assessment and interface between NBs and the EMA/Competent Authorities
- Discussions of CDx-related questions on procedural process
- Regular TCs

March 2021 - set up of the CDx consultation Working Group

- 1st Meeting in April 2021: setting the scene
- 2nd Meeting in May 2021: case studies
- 3rd Meeting in June 2021 and further steps

CDx consultation Working Group - Composition

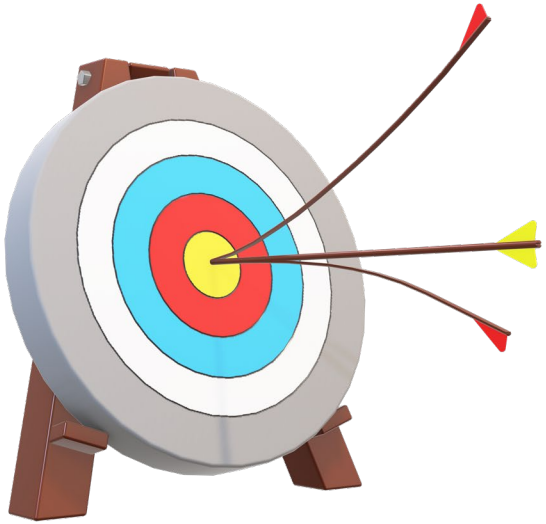
EMA/CHMP/CAT experts

NB subgroup

EC

Device NCAs

CDx consultation Working Group - Objectives



- Opportunity to have two-way dialogue on data requirements for IVD (CDx) conformity assessment and NB review and scope of CHMP scientific opinion on CDx suitability with medicinal product
- Develop a EMA/CHMP/CAT procedural guidance on the consultation of CHMP by NB on CDx
- Aim to prepare for first applications on legacy IVD-CDx (pilot of real cases)

Legacy IVD-CDx already on the market

- CDx currently on the market will have to conform to IVDR by 26 May 2022 or can no longer be placed on the market

- NB provided estimates of number of manufacturers who are planning to submit applications for conformity assessment in 2021

Procedural steps for CDx consultation – under discussion

1) NB's letter of intention to submit to EMA

- Letter of intention preferably at least 3 months before the expected date of submission

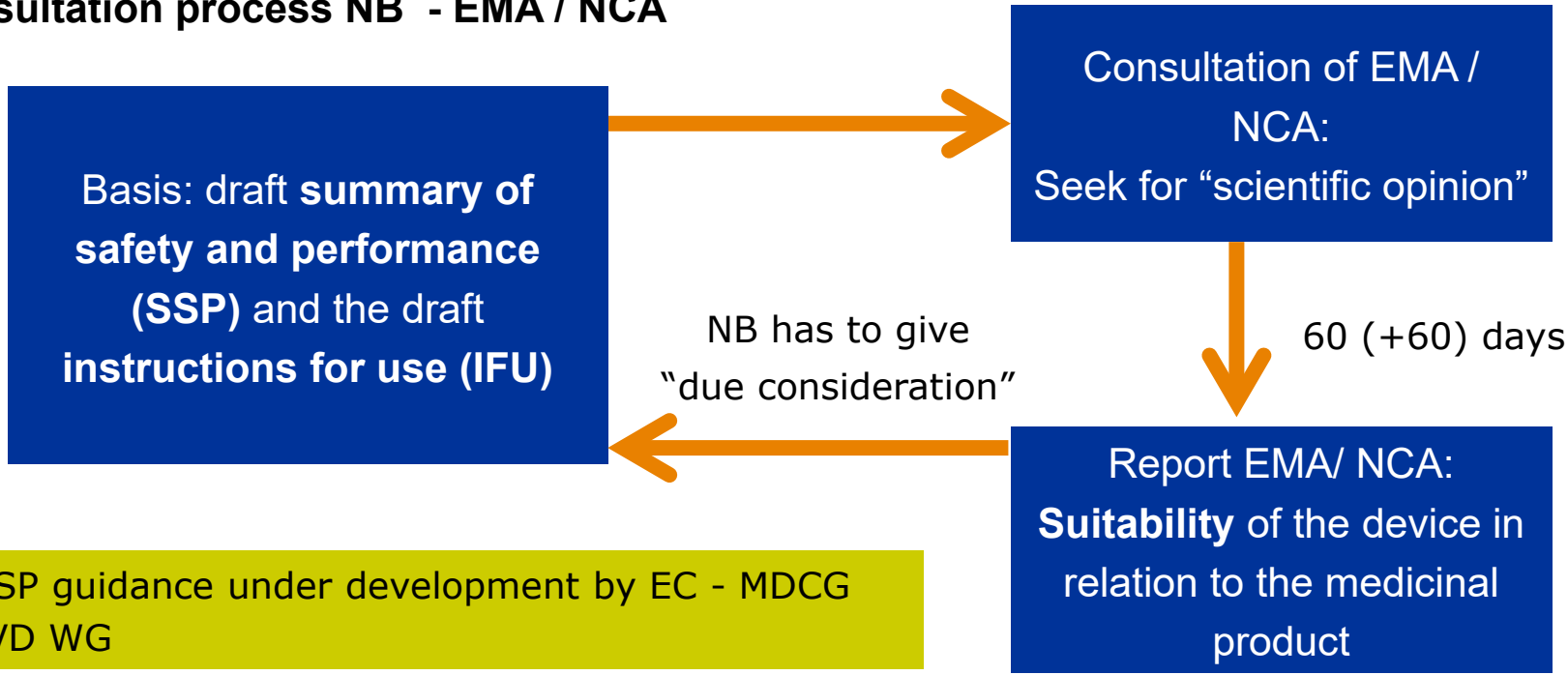
2) Pre-submission meeting with the EMA, NB and device manufacturer **(?)**

- Pre-submission meeting preferably 3-6 months before the expected date of submission

3) NB plan to start consultation procedure only when NB's positive decision on compliance of technical dossier

Conformity assessment and a scientific consultation (Annex IX, IVDR)

Consultation process NB - EMA / NCA



SSP guidance under development by EC - MDCG IVD WG

Time point for the CDx consultation procedure

Different scenario to consider regarding development of CDx for a new predictive biomarker for personalised medicinal product

- A **co-developed CDx**
- **Late-stage CDx** development

→

- Initial MAA
  - Standard assessment
  - Accelerated assessment
- Extension of indication

Which is best time point for the consultation procedure?

Follow-on CDx → MA variation for PI update?

Data package and scope for the CDx consultation

- Main scenarios for tests intended for CE marking as CDx acc. to the new IVDR:
  - **Test has been used in the clinical pivotal phase**
  - **Test used in the clinical pivotal phase is not CDx, CDx is developed subsequently**
  - **Follow-on CDx or Me-Too CDx**
- **Legacy** scenario when switching from IVDD to IVDR:
  - (co-developed) test is already available but has to classified under the IVDR as a CE-CDx

- What data package may be available depending whether part of the MAA/EoI or not ?
- Scope of CHMP-CAT review?

CHMP–CAT D80 AR

3.5. *In vitro biomarker test for patient selection for efficacy*

Scientific rationale for the choice of the predictive in vitro biomarker test (e.g. prevalence, relation to disease mechanism).

Analytical method including assay platform, specimen, pre-analytical processing requirements and read-out method.

Analytical and clinical validation strategy:

- *Analytical validity: For verifying the suitability of an assay, robustness, accuracy, specificity, sensitivity and linearity should be considered depending on the analytical platform*
- *Clinical validity (sensitivity/specificity) should be described either by correlation with a clinical endpoint (for novel assays) or –if available– by concordance study with a clinically valid reference assay*
- *Cut-point selection should be described and discussed in detail since it is of particular importance for the benefit /risk assessment.*

Next steps

- Further meetings with NBs to consider the various scenarios and to discuss the scope of the EMA evaluation versus NB assessment

Targeted outputs

- Draft procedure for consultation between NB and EMA/NCA
- Draft CHMP opinion template + guidance to assessors
- Pilot of real cases

Others

- To clarify level of information about assay/CDx in the labelling of medicinal product

Any questions?

Official address Domenico Scarlattilaan 6 ● 1083 HS Amsterdam ● The Netherlands
Telephone +31 (0)88 781 7281
Send us a question Go to www.ema.europa.eu/contact

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