EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

Standard operating procedure

Title: Procedure for provision of scientific recommendation on classification of ATMPs		
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Lead author	Approver	Effective date: 13-JUN-16
Name: Patrick Celis	Name: Tony Humphreys	Review date: 13-JUN-19
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1. Purpose

The purpose of this SOP is to describe internal procedures and tasks performed by the Committee for Advanced Therapies (CAT) secretariat and the Innovation Task Force (ITF) in order to provide scientific, technical and regulatory support to the CAT for the provision of scientific recommendation on classification of Advanced Therapy Medicinal Products (ATMPs). This procedure concerns all steps for pre-submission, validation and assessment of the requests by companies of such scientific recommendation as well as publication of the summary of the classification.

2. Scope

This SOP applies to:

- the CAT secretariat in the Scientific Committees Service
- the members of the ITF involved in ATMP classification procedures, including Regulatory Affairs Officers and Legal Administrators.

3. Responsibilities

It is the responsibility of each Head of Department/Office/Service to ensure that this procedure is adhered to within their own Department/Office/Service. The responsibility for the execution of a particular part of this procedure is identified in the right-hand column of 9. Procedure.

4. Changes since last revision

Extensive revision to rewrite SOP.

30 Churchill Place ● Canary Wharf ● London E14 5EU ● United Kingdom
Telephone +44 (0)20 3660 6000 **Facsimile** +44 (0)20 3660 5555
Send a question via our website www.ema.europa.eu/contact

5. Documents needed for this SOP

Templates:

Located on X:\Templates\Filenew\H – ATMP\ Classification of ATMPs

- Background document
- E-mail to applicant: acknowledgement of receipt of the request
- Validation Note
- Report on scientific recommendation for the ATMP classification
- Letter to applicant including the timetable of procedure and appointment of CAT and ITF coordinators
- E-mail to applicant with LoQs (attachment)
- Letter to applicant with LoQs and oral explanation date
- Letter to the EC with draft report
- Letter to applicant on the outcome of the ATMP classification
- Summary for public release
- Checklist for quality for Summary for publication

Located on EMA website: Home / Human regulatory / Advanced therapies / Advanced-therapy classification

- Pre-submission request form
- Background document

6. Related documents

Procedural documents available to applicants are published on the EMA website at:

http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general_content_000296.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac058007f4bc&jsenabled=true

path: Home / Human regulatory / Advanced therapies / Advanced-therapy classification

Reflection paper on classification of advanced therapy medicinal products at:

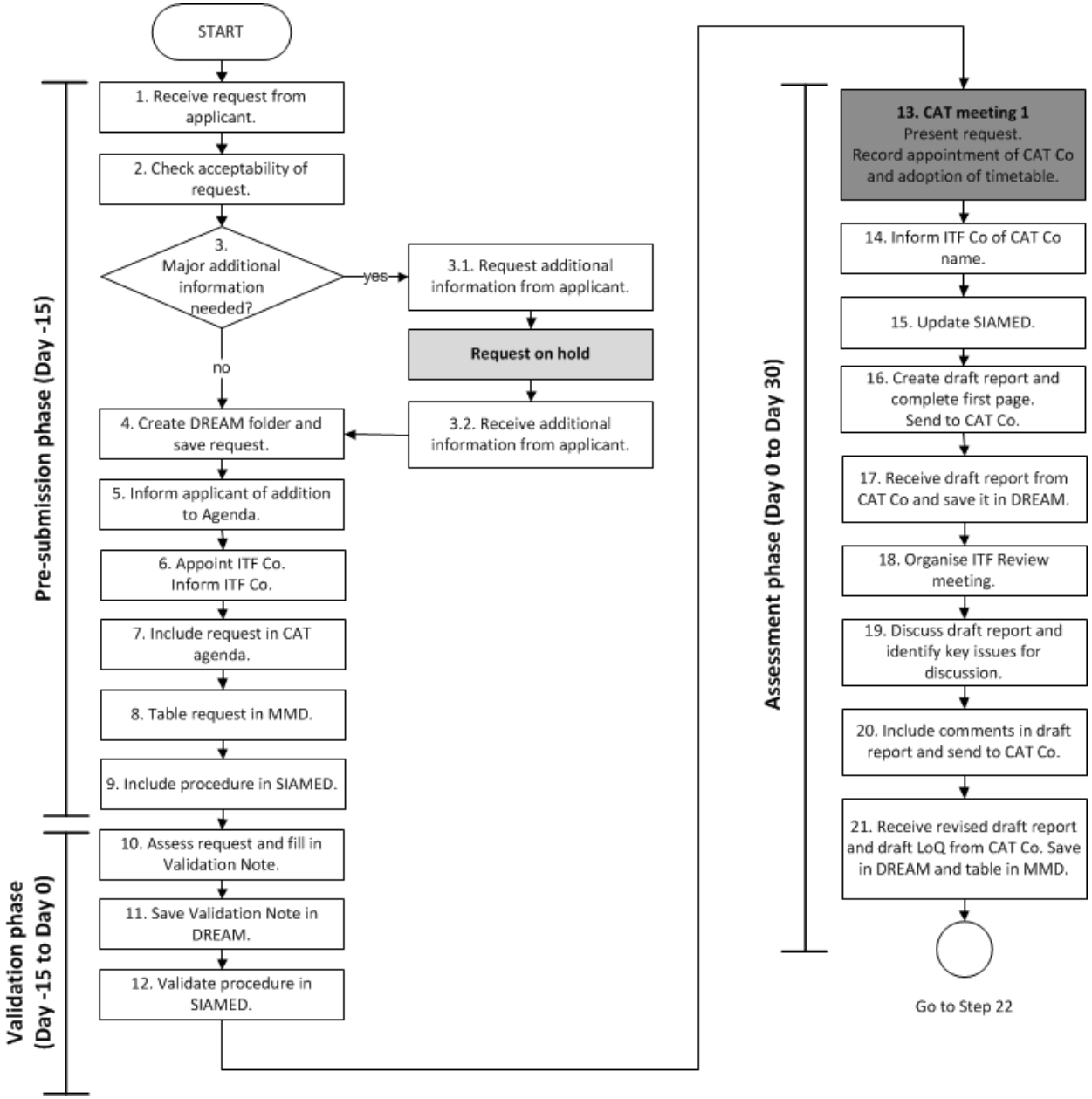
http://www.ema.europa.eu/docs/en_GB/document_library/Scientific_guideline/2015/06/WC500187744.pdf

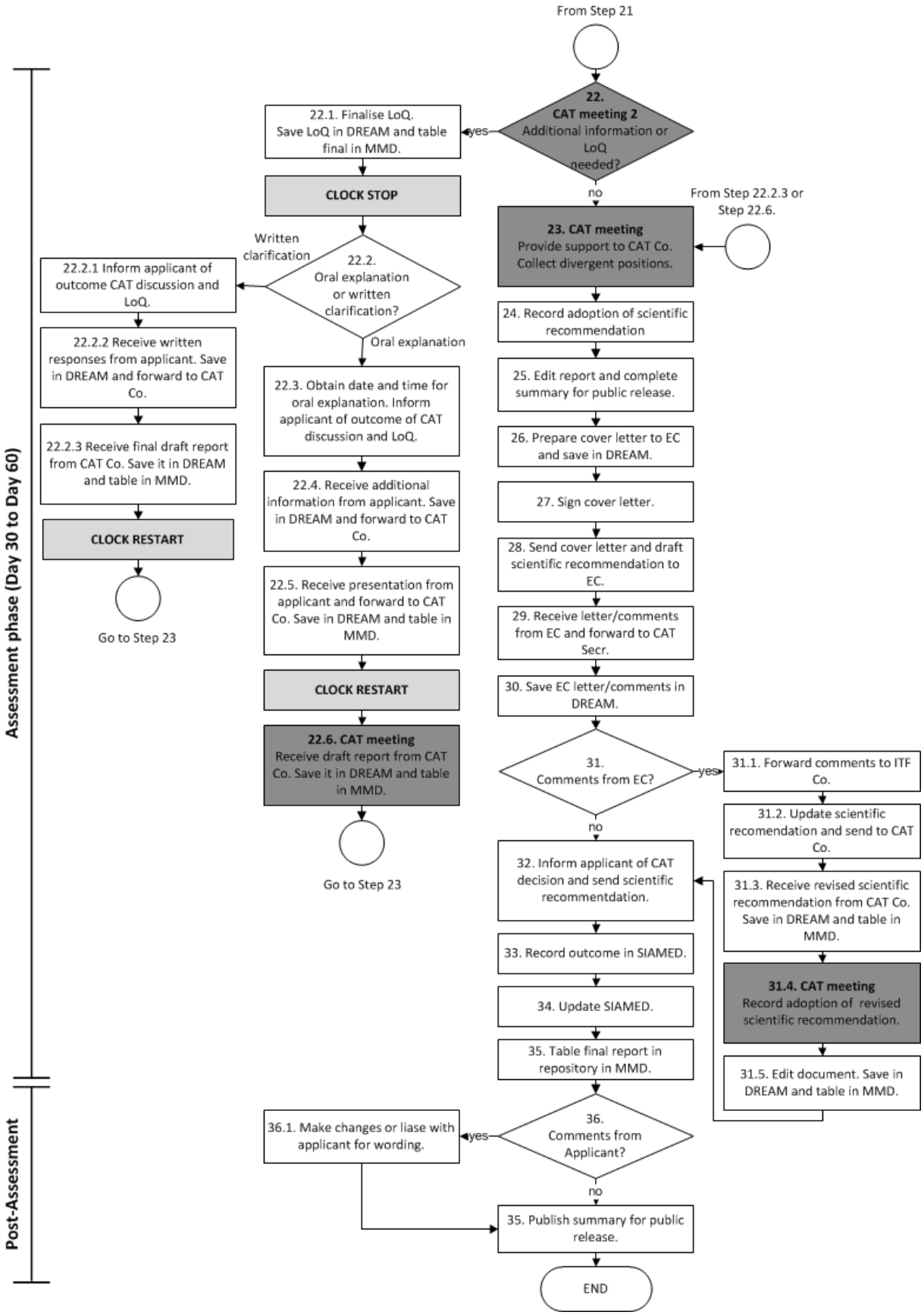
7. Definitions

ATMP:	Advanced Therapy Medicinal Product
CAT:	Committee for Advanced Therapies
CAT Co:	CAT coordinator
C-CS-SCS:	Scientific Committees Service
DREAM:	Document Records Electronic Archive Management system

EC:	European Commission
EMA:	European Medicines Agency
HoSer:	Head of Service
ITF:	Innovation Task Force
ITF Co:	Innovation Task Force Coordinator
LoQ:	List of questions
MMD:	Meeting Management Document system
Secr:	Secretariat

8. Process map(s)/ flow chart(s)




Assessment phase (Day 30 to Day 60)
Post-Assessment
From Step 21
22.
CAT meeting 2
Additional information or LoQ needed?
yes
22.1. Finalise LoQ. Save LoQ in DREAM and table final in MMD.
CLOCK STOP
22.2.
Oral explanation or written clarification?
Written clarification
22.2.1 Inform applicant of outcome CAT discussion and LoQ.
22.2.2 Receive written responses from applicant. Save in DREAM and forward to CAT Co.
22.2.3 Receive final draft report from CAT Co. Save it in DREAM and table in MMD.
CLOCK RESTART
Go to Step 23
Oral explanation
22.3. Obtain date and time for oral explanation. Inform applicant of outcome of CAT discussion and LoQ.
22.4. Receive additional information from applicant. Save in DREAM and forward to CAT Co.
22.5. Receive presentation from applicant and forward to CAT Co. Save in DREAM and table in MMD.
CLOCK RESTART
22.6. CAT meeting
Receive draft report from CAT Co. Save it in DREAM and table in MMD.
Go to Step 23
no
From Step 22.2.3 or Step 22.6.
23. CAT meeting
Provide support to CAT Co. Collect divergent positions.
24. Record adoption of scientific recommendation
25. Edit report and complete summary for public release.
26. Prepare cover letter to EC and save in DREAM.
27. Sign cover letter.
28. Send cover letter and draft scientific recommendation to EC.
29. Receive letter/comments from EC and forward to CAT Secr.
30. Save EC letter/comments in DREAM.
31.
Comments from EC?
yes
31.1. Forward comments to ITF Co.
31.2. Update scientific recomendation and send to CAT Co.
31.3. Receive revised scientific recommendation from CAT Co. Save in DREAM and table in MMD.
31.4. CAT meeting
Record adoption of revised scientific recommendation.
31.5. Edit document. Save in DREAM and table in MMD.
no
32. Inform applicant of CAT decision and send scientific recommentdation.
33. Record outcome in SIAMED.
34. Update SIAMED.
35. Table final report in repository in MMD.
36.
Comments from Applicant?
yes
36.1. Make changes or liase with applicant for wording.
no
35. Publish summary for public release.
END

9. Procedure

Step	Action	Responsibility
Pre-submission phase (Day -15)		
1.	Receive in the Advanced.therapies@ema.europa.eu inbox the request for recommendation for ATMP classification from the applicant. Forward the request to the CAT Committee Manager. *Note: the request is composed of two documents (see templates):* • *Background document;* • *Pre-submission request form.*	CAT Assistant
2.	Check the acceptability of the request.	CAT Committee Manager
3.	Is major additional information needed from the applicant? If yes, go to step 3.1. If no, go to step 4.	CAT Committee Manager
3.1.	Request from the applicant additional information (by e-mail). **PROCEDURE ON HOLD**	CAT Committee Manager
3.2.	Receive the additional information from the applicant and/or updated request. Inform the CAT Assistant of the acceptability of the request.	CAT Committee Manager
4.	Create a product folder and subfolders in DREAM (01. Evaluation of Medicine/H-Advance Therapies/Classification/<product name>). Save the request and documentation provided in the product folder in DREAM (<product name>\01. Submission & Validation).	CAT Assistant
5.	Inform the applicant by e-mail (see template) that their request has been added to the forthcoming agenda and the timetable for the procedure Save the acknowledgment e-mail in the product folder in DREAM (<product name>/01. Submission & Validation).	CAT Assistant
6.	Appoint an ITF coordinator amongst ITF members according to the rota system (02b. Administration of Scientific Meeting/CAT - Administration/3. Other activities/06. CAT Procedures/1. ATMP Classification Rota List ATMP Classification <20xx>). *Note: the appointed ITF coordinator should have no restrictions for the product according to SOP/EMA/0101 – Conducting checks for conflicts of interest of Agency employees assigned duties relating to medicinal products for human or veterinary use.* Inform the appointed ITF coordinator of the request and forward	CAT Assistant

Step	Action	Responsibility
	the DREAM link to the product folder.	
7.	Include in the agenda of the forthcoming CAT meeting (section 04.1.): • the request for nomination of CAT Coordinator; • the draft timetable for the procedure according to the dates for submission agreed by the CAT for the relevant year published at: http://www.ema.europa.eu/ema/index.jsp?curl=pages/regulation/general/general_content_000296.jsp&murl=menus/regulations/regulations.jsp&mid=WC0b01ac058007f4bc&jsenabled=true Path: Home / Human regulatory / Advanced therapies / Advanced-therapy Classification	CAT Assistant
8.	Table the request in MMD for the forthcoming CAT meeting: 02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM>CAT/4. CLASSIFICATIONS).	CAT Assistant
9.	Enter relevant data on the classification request in the pre-submission module of SIAMED II.	CAT Assistant
Validation phase (Day -15 to Day 0)		
10.	Assess the information provided by filling in the form Validation Note (see template). Highlight specific points for consideration by the CAT coordinator and include relevant previous cases.	ITF coordinator
11.	Save the Validation Note in the product folder in DREAM (01. Evaluation of Medicines/H-Advance Therapies/Classification/<product name>/01 Submission & Validation).	ITF coordinator
12.	Check the product description and validate the classification procedure in SIAMED II.	ITF coordinator
Assessment phase (Day 0 to Day 30)		
13.	**Day 0 - CAT meeting 1: Presentation of request – Appointment of CAT coordinator – Adoption of timetable.** Present the request for recommendation for ATMP classification to the CAT. *Note: the CAT appoints a CAT member as CAT coordinator for the procedure and adopts the timetable.* *The appointed CAT member should have no restrictions for the product according to SOP/EMA/0040 – Evaluation of conflicts of interests of experts for involvement in Agency activities.* Record the appointment of the CAT coordinator and the adoption of	CAT Committee Manager

Step	Action	Responsibility
	the timetable in the minutes of the meeting.	
14.	**By Day 5 of the procedure:** Inform the ITF coordinator by e-mail of the name of the appointed CAT coordinator.	CAT Committee Manager
15.	Include resources in SIAMED II.	CAT Assistant
16.	**By Day 5 of the procedure:** Create the draft report on scientific recommendation on ATMP classification (see template) and complete the first page. Send the Validation Note and the pre-fillled template for the report on scientific recommendation to the CAT coordinator. *Note: the CAT coordinator prepares the draft report on scientific recommendation and provides it to the ITF coordinator.*	ITF coordinator
17.	**By Day 15 of the procedure**: Receive the draft report on scientific recommendation from the CAT coordinator, save it in the product folder in DREAM (<product name>/02. CAT Co-ordinator Report).	ITF coordinator
18.	**By Day 18 of the procedure**: **ITF review meeting.** Organise the ITF review meeting, to be attended by ITF coordinator, including, if necessary, a teleconference with relevant CAT coordinator. Send an Outlook invitation with links to the product folder in DREAM.	ITF secretariat
19.	Review of the report on scientific recommendation on ATMP classification Discuss the draft reports in the presence of Regulatory Affairs and Legal colleagues on regulatory, legal and scientific aspects, taking into account precedent opinions during the review meeting, and identify key issues for further discussion at the next CAT meeting.	ITF members
20.	After the meeting include comments in the report (as Track Changes), upversion it with *'ITF Peer Review'* in the product folder in DREAM (<product name>/02. CAT Co-ordinator Report) and send it to the CAT coordinator. *Note: the CAT coordinator revises the draft report on scientific recommendation taking into account the comments from the ITF review, prepares a draft list of questions to the applicant, if applicable, and sends the revised draft report and, if applicable, draft LoQ to the ITF coordinator.*	ITF coordinator

Step	Action	Responsibility
21.	**By Day 23 of the procedure**:	
	Receive the revised draft report on scientific recommendation and, if applicable, the draft LoQ from the CAT coordinator.	ITF coordinator
	Save the documents in the product folder in DREAM: • report: <product name>/02. CAT Co-ordinator Report with the inclusion in the Version label 'revised after ITF input'; • LoQ: <product name>/03. List of Quesions.	
	Table the revised draft report and, if applicable, the draft LoQ in MMD for adoption (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS).	
Assessment phase (Day 30 to Day 60)		
22.	**By day 30 - CAT meeting 2: Presentation of the draft report and discussion of major comments received.**	
	Note: during the CAT meeting, the CAT coordinator presents the draft report on scientific recommendation highlighting key issues identified during the ITF review meeting and any point for discussion. The CAT coordinator, if applicable, highlights any additional information (LoQ) needed from the applicant to conclude on the classification of the product.	
	If no questions or additional information identified by the CAT, go to step 24.	ITF coordinator
	If questions identified by CAT, go to step 22.1.	
22.1	Finalise the LoQ in collaboration with the CAT coordinator taking into account the discussions during the CAT meeting and save the final LoQ in the product folder in DREAM (<product name>/03. List of Questions).	ITF coordinator
	Table the final LoQ in MMD with action showing as *adopted*: 02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS).	
	CLOCK-STOP	
22.2.	Did the CAT decide on a written clarification or an oral explanation? If written clarification is needed, go to step 22.2.1. If an oral explanation is needed, go to step 22.3.	
	Record the decision on an oral explanation or written clarification in the minutes of the meeting.	CAT Committee Manager
22.2.1	Inform the applicant by e-mail (see template) of the outcome of the CAT discussion, providing:	ITF coordinator

Step	Action	Responsibility
	• decision on the need for additional information; • deadline for responses; • LoQ. Save the e-mail to the applicant in the product folder in DREAM (<product name>/03. List of Questions).	
22.2.2	Receive written responses from the applicant within the set timeframe and save them in the product folder in DREAM (<product name>/03. List of Questions). *Note: the company should send the responses to the ITF coordinator.* Forward the written responses to the CAT coordinator and request an update of the report on scientific recommendation within the set timeline *Note: the CAT coordinator assesses the responses received from the applicant, finalises the draft report on scientific recommendation and sends the final draft report to the ITF coordinator.*	ITF coordinator
22.2.3	Receive the final draft report on scientific recommendation from the CAT coordinator, save it in the product folder in DREAM (<product name>/02. CAT Co-ordinator Report) with 'after written clarification' as upversion label and table it in MMD for adoption (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS/4.3. LoQ). Go to step 24. **CLOCK RESTART**	ITF coordinator
22.3.	Obtain the date and time for the oral explanation from the CAT Secretariat. Inform the applicant by letter (see template) of the outcome of the CAT discussion, providing the following information: • decision on the need for additional information; • deadline for responses; • proposed date for an oral explanation; • LoQ. Request from the applicant (a week before the meeting): • list of participants; • Power Point presentation. Save the letter to the applicant in the product folder in DREAM (<product name>/03. List of Questions).	ITF coordinator
22.4.	Receive additional information from the applicant within the set timeframe and save it in the product folder in DREAM (<product name>/03. List of Questions).	ITF coordinator

Step	Action	Responsibility
	Note: the company should send the additional information to the ITF coordinator.	
	Forward the written responses to the CAT coordinator and request an update of the classification report within the set timeline.	
	Note: the CAT coordinator assesses the additional information received from the applicant in preparation of the oral explanation.	
22.5.	Receive the presentation, forward it to the CAT coordinator and save it in the product folder in DREAM (<product name>/03. List of Questions).	ITF coordinator
	Table the presentation in MMD for the next CAT meeting for information (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS).	
	Go to step 22.6. **CLOCK RESTART**	
22.6.	**CAT meeting 2: Adoption of scientific recommendation pending comments from EC.**	
	Note: the CAT hears the oral explanation by the applicant and discusses the information provided.	
	The CAT coordinator supported by the ITF coordinator finalises the draft report on scientific recommendation taking into account the additional information provided and the discussion at the CAT meeting. The CAT coordinator sends the final draft report to the ITF coordinator.	
	Receive the draft report on scientific recommendation from the CAT coordinator, save it in the product folder in DREAM (<product name>/02. CAT Co-ordinator Report) with 'after oral explanation' as upversion label and table it in MMD for adoption (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS).	ITF coordinator
23.	**CAT meeting 2: Adoption of scientific recommendation pending comments from EC.**	
	Note: in absence of an oral explanation, further to CAT discussion, the CAT coordinator includes amendments to the scientific recommendation prior to adoption.	
	Provide support to the CAT coordinator.	ITF coordinator
	Note: the CAT adopts the scientific recommendation to be sent for comments to the EC. In case of adoption by majority the CAT member(s) expressing diverging view draft(s) the divergent position.	
	Collect signed divergent positions from the concerned CAT	ITF coordinator

Step	Action	Responsibility
	members and include them as Annex C.	
24.	Record the adoption of the scientific recommendation pending comments from EC in the minutes of the meeting.	CAT Committee Manager
25.	Edit the report (i.e. insert the date of the adoption by CAT, remove all track changes, remove word 'draft' on first page). Complete the summary for public release in the scientific recommendation (if not already done by CAT coordinator). Link the scientific recommendation in the product folder in DREAM (<product name>/04. EC Consultation) and table it in MMD for the post-mail (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS).	ITF coordinator
26.	Prepare a cover letter (see template) to accompany the draft scientific recommendation to the EC for comments and save it in the product folder in DREAM (DREAM<product name>/04. EC Consultation). E-mail it including the link to the product folder to the HoSer C-CS-SCS.	CAT Assistant
27.	Sign the cover letter electronically in DREAM (<product name>/04. EC Consultation) by upversioning it with *'seen and agreed'* in the attribute field 'Version'.	HoSer C-CS-SCS
28.	Send the cover letter and the draft scientific recommendation for comments within ten days from receipt by Eudralink to the EC representative to CAT. Save the Eudralink message in the product folder in DREAM (<product name>/04. EC Consultation).	CAT Assistant
29.	Receive a letter or comments from the EC and forward them to the CAT secretariat (in case CAT Secretariat has not been copied on the correspondence from EC).	HoSer C-CS-SCS
30.	Save the EC letter/e-mail in the product folder in DREAM (<product name>/04. EC Consultation).	CAT Assistant
31.	If editorial comments (or none) received from the EC, implement these changes and go to step 32. If legal/regulatory/scientific comments received from the EC, go to step 31.1.	CAT Assistant
31.1.	Forward the comments to the ITF coordinator.	CAT Assistant
31.2.	Update the scientific recommendation taking into account the comments from the EC and send the revised scientific recommendation to the CAT coordinator for comments. *Note: the CAT Coordinator provides the revised scientific recommendation to the ITF coordinator.*	ITF coordinator

Step	Action	Responsibility
31.3.	Upversion the revised scientific recommendation from the CAT coordinator in the product folder in DREAM (<product name>/05. Final Scientific Recommendation) with *'after EC comments'* as label and table it in MMD for adoption (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM> CAT/4. CLASSIFICATIONS).	ITF coordinator
31.4.	**CAT meeting 3: Adoption of revised scientific recommendation after comments by the EC are received.** *Note: the CAT adopts the revised scientific recommendation after comments by the EC.* Record the adoption of the revised scientific recommendation in the minutes of the meeting.	CAT Committee Manager
31.5.	Edit the document (i.e. insert the date of the CAT meeting, remove all track changes, remove the word 'draft', update the summary for public release if necessary). Attach the applicant's briefing documents (Annex). Check-in the scientific recommendation as a link in the product folder in DREAM (<product name>/05. Final Scientific Recommendation) and table it in MMD as adopted for post-mail (02. Coordination of Scientific Meeting/CAT/MMD/<year>/<YYYY>-<MM>/4. CLASSIFICATIONS). Go step 32.	ITF coordinator
32.	Inform the applicant by letter (see template) of the outcome of CAT decision, providing in attachment, the final scientific recommendation. Include in the cover letter the deadline of receipt of comments by the applicant (two weeks from receipt of letter). Save the letter in the product folder in DREAM (<product name>/05. Final Scientific Recommendation).	CAT Assistant
33.	Record the outcome of the procedure in SIAMED II.	CAT Assistant
34.	Add relevant information on the product in the field *'reason/justification/additional information'* and close the procedure in SIAMED II.	ITF coordinator
35.	Table the final report (in PDF mode) into the repository in MMD (02. Coordination of Scientific Meeting/CAT/MMD.ATMP Classif. Reports/<relevant folder according to classification>).	CAT Assistant
Post-Assessment phase		
36.	Has the applicant sent comments on the summary (within two weeks of receipt of the letter)?	CAT Assistant

Step	Action	Responsibility
	If yes, go to step 36.1. If no, go to step 37.	
36.1.	Make changes if needed or liaise with the applicant until agreement on the wording has been reached. Go to step 37.	CAT Committee Manager
37	Extract the section 'Summary for Public Release' from the scientific recommendation for publication (see template). Send the summary for public release (in PDF mode) and the table (in Word mode) to the Webteam for publication on the EMA external website. Refer to quality checklist (see template). After publication, check the correctness of the information, documents and links published on the EMA external website.	CAT Assistant

10. Records

All required documents received and/or generated during this procedure are saved electronically in the product folder in DREAM (01. Evaluation of Medicines/H–AT/ATMP Classifications/<product name>).

The following documents are considered records (retention time: 30 years):

- letter to the EC including the request and the draft scientific recommendation
- reply from the EC (agreement or comments)
- final scientific recommendation adopted by the CAT