

Equipping the FDA to Advance Gene Therapies

Gene therapies are changing the future of human health as we know it. After more than 20 years of careful study, gene therapies are now making their way through the FDA approval process and to patients who need them.

By targeting the cause of disease directly, gene therapies have the potential to fundamentally reshape the trajectory of disease. Gene therapies are different from traditional pharmaceutical and biologic medicines in that they are delivered as one-time treatments that can offer long-lasting – sometimes lifelong – benefits for patients and the healthcare system alike.

Our constantly evolving knowledge of gene therapy development and manufacturing necessitates flexible, innovative approaches to bring safe and effective therapies to patients with urgency.

Equipping FDA to Advance Gene Therapies and Innovate

Adequate resources and expertise are essential for ensuring the FDA's ability to perform its mission. The Center for Biologics Evaluation and Research (CBER), responsible for oversight of gene therapies, faces a significant workload due to the number of investigational new drug applications (INDs). Gene therapy is a rapidly evolving field. FDA and CBER must be adequately resourced and staffed to engage in timely, effective dialogue with sponsors. IGT calls on Congress to:



APPROPRIATE
new funds to
FDA for FY
2022



ENCOURAGE FDA
to implement
innovative and flexible
tools to advance
gene therapies



ENCOURAGE FDA
to leverage existing
expertise internally
across Centers and
externally



PASS the PDUFA
VII reauthorization
with allocation of
additional funding
and staff for CBER

Preserve and Reinforce Expedited Programs

The FDA's expedited programs, including the Regenerative Medicine Advanced Therapy (RMAT) designation and accelerated approval pathway, deliver life-enhancing and life-saving new treatments, such as gene therapies, to patients with serious, life-threatening diseases quickly. FDA has indicated that the accelerated approval pathway may be an appropriate avenue for gene therapies that offer the potential to alter or cure the underlying genetic defect that causes a serious disease not addressed by available therapy. Congress should encourage FDA to utilize expedited programs, such as RMAT and accelerated approval, when appropriate to ensure gene therapies reach patients in a timely way.

IGT is concerned that payers are increasingly denying or restricting access to medicines approved through expedited approval programs undermining FDA's effectiveness in speeding innovative therapies to seriously ill patients with unmet needs. IGT asks that Congress reinforce FDA's statutory role as the expert entrusted by Congress to determine the safety and efficacy of medicines for patients in the U.S.

Improving Manufacturing Flexibility

FDA has made great strides in developing flexible approaches to accelerate clinical development of treatments for serious or life-threatening conditions. For gene therapy, compressed clinical development can lead to a bottleneck in Chemistry Manufacturing and Controls (CMC) aspects of development, potentially delaying the availability of urgently needed treatments. Gene therapy manufacturing is extremely complex and, unlike traditional pharmaceutical processes, it is highly dynamic, evolving as experience grows. This is particularly true for rare diseases facing limited patient populations. IGT calls on Congress to enable FDA to apply an iterative, risk-based CMC review framework that considers disease severity, rarity and unmet need, stage of development, and prior knowledge from related manufacturing processes. This will help expedite development and ensure timely access to life-saving therapies while maintaining patient safety and FDA's rigorous approval standards.

Facilitating Individualized Gene Therapies Pathways

Many serious and life-threatening diseases and disease subpopulations are very rare, affecting as few as one patient globally. A new, streamlined regulatory process is needed to create a sustainable path to approval for individualized gene therapies which may treat a very small number of patients ranging from ~1 to 100/year and otherwise might not be developed. IGT urges Congress to support FDA's efforts to recognize the unique advantage of gene therapy platforms – namely, the ability to leverage data and information from one gene therapy to another when common components (e.g., vector, promoter) are used across therapies and disease areas.