CHEMISTRY

Management of the Chemistry, Manufacturing, and Controls Coordinating Committee

CONTENTS

PURPOSE

- This MAPP describes the roles and responsibilities of the Chemistry, Manufacturing, and Controls Coordinating Committee (CMC CC), as well as the procedures for establishing chemistry and microbiology technical committees and working groups under CMC CC. It also describes the structure and function of the technical committees and working groups, the procedures for designating members to serve on the technical committees and working groups, and the responsibilities of those designated to serve on technical committees or working groups.

BACKGROUND

- The Center for Drug Evaluation and Research (CDER) has formed many committees and working groups to address various chemistry and microbiology issues. These committees perform most effectively if the objectives of each committee and the responsibilities of its members are clearly defined. Each committee should also effectively communicate its work product both within and outside of CDER. Coordination of the functions of these committees is desirable to ensure effective use of staff resources and to establish and

maintain consistent chemistry and microbiology policy throughout the Office of Pharmaceutical Science (OPS). To achieve these various objectives, CDER has established the CMC CC.

- On December 14, 1992, the CMC CC was formally established in a memorandum from the Director, CDER, to the Office Directors, Division Directors, supervisory chemists and chemistry review staff. Since its establishment, the CMC CC has restructured the chemistry and microbiology committees into technical committees and working groups and delineated their roles and responsibilities.

REFERENCES

- Memorandum of December 14, 1992, from the Director, CDER.
- The Food and Drug Administration's Development, Issuance, and Use of Guidance Documents (i.e., Good Guidance Practices; 62 FR 8961, February 27, 1997).
- Guidance to Issuance of Directives in the Center for Drug Evaluation and Research (MAPP 4000.1).
- Developing and Issuing Guidance for Industry (MAPP 4000.2).

The following descriptions and explanations should be applied on a general basis. There will be some variation in the implementation given project priority, membership, and workload demands.

ORGANIZATION

- **CMC CC**

  1. **Oversight.** CDER oversight for CMC CC is provided by the Deputy Center Director for Pharmaceutical Science (DCDPS).

  2. **Chair.** The CMC CC is co-chaired by the Directors of the Office of New Drug Chemistry (ONDC) and the Office of Generic Drugs (OGD), CDER, or their designees.

3. **Members.** The CMC CC members are the Chair(s), the chemistry division directors from ONDC and OGD, and the ONDC Associate Director for Microbiology.

4. **Project Manager/Executive Secretary.** One or more persons are designated by the Chair(s) to serve as project manager and executive secretary.

5. **Permanent Observers, Other Observers.** CMC CC may designate representatives from other FDA organizations such as CDER's Office of Compliance (OC), Regulatory Policy Staff (RPS), Compendial Operations Staff (COS), and Office of Testing and Research (OTR), and FDA's Office of Regulatory Affairs (ORA) as permanent observers of CMC CC meetings. CDER and other FDA staff who wish to observe (i.e., other observers) may attend as space permits.

- **Technical Committees**

1. **Committee Chairs and Vice-Chairs**. The CMC CC will select a Chair and a Vice-Chair for each technical committee, taking into account expertise and interest in the subject matter of the technical committee, review workload, other work obligations, and organizational, management, communication, and interpersonal skills. Chairs and Vice-Chairs are selected with the goal of achieving representation from ONDC and OGD, if practicable. Chairs, because of their committee responsibilities, usually should not be members of any other CMC CC technical committees.

   Each Chair will usually serve for a 2-year term. However, the CMC CC may, depending on such factors as the status of CMC CC projects or the expertise or experience of the other committee members, decide to extend the term in 1-year increments. Similarly, CMC CC may evaluate the circumstances and decide to rotate the Chair or Vice Chair before 2 years have lapsed. When the Chair's term expires, the Vice-Chair will usually become the Chair. After the Chair's term expires, he/she will usually serve as a member on the committee for an additional year to provide historical knowledge and continuity for the technical committee's activities.

   ONDC and OGD office directors and division directors do not serve as Chairs or Vice Chairs of technical committees.

2. **Membership.** Members are chosen to serve on technical committees based upon their qualifications, expertise, and interest in the subject matter of the technical committee, their workload, and the demands on their time from membership on other committees or other work obligations. In general, no person should serve on more than one CMC CC technical committee concurrently.

Technical committee membership should be kept small (Chair, Vice-Chair and approximately four members), and representation should be obtained from ONDC and OGD whenever necessary and/or possible. Normally the ratio of ONDC to OGD members on a committee reflects the ratio within OPS. Depending on the technical committee, membership may include representatives from organizations other than ONDC and OGD (e.g., other Centers, OC, OTR, Office of Clinical Pharmacology and Biopharmaceutics (OCPB)).

Members on technical committees will be rotated periodically. Members will usually serve a 3-year term, with the terms of the members being staggered so that a portion of the membership changes each year. Generally, no person, other than the Chair or Vice-Chair, who will usually have served first as a technical committee member, should serve on a committee for longer than 3 years. When appropriate, a member's term may be extended or shortened by the CMC CC. Members from organizations other than ONDC and OGD serve on technical committees at the discretion of their management.

3. **Liaisons.** CMC CC members are designated to serve as liaisons to certain technical committees in the capacity of facilitator and as a resource for advice or problem solving as necessary.

4. **Observers.** With CMC CC approval, persons from organizations other than ONDC and OGD (e.g., COS) may serve as observers on technical committees.

- **Working Groups**

1. To facilitate the work of the technical committees, the use of smaller, short-term *ad hoc* working groups to address specific issues is encouraged. CMC CC or committees, with CMC CC approval, may create working groups on specific issues bringing in additional expertise as necessary. Working groups may report directly to CMC CC or through a technical committee.

2. Working groups are organized like technical committees (described above) with the following exceptions:

   - Chair is appointed by CMC CC to lead a working group, but usually there is no Vice-Chair. ONDC and OGD office directors and division directors may serve as Chairs or Vice-Chairs. Chairs may also be appointed from other OPS Offices (e.g., OTR, OCPB).

   - There is usually no rotation of working group Chairs and members because working groups are created to deal with specific issues and the length of the projects is usually shorter than for projects undertaken by technical committees. After formation of the working group, new members will be appointed by CMC

CC to replace members lost by attrition or to bring additional expertise to the working group.

- Once a working group's assignment(s) is completed, the working group is disbanded. Technical committees are long-standing committees.

RESPONSIBILITIES

- **CMC CC is responsible for:**

1. Establishing chemistry and microbiology guidance, policies, and procedures that will facilitate industry submission of high-quality applications and help ensure high-quality, consistent chemistry and microbiology reviews throughout OPS and, where appropriate, among OPS, other Centers, and the field.

2. Resolving policy issues that may arise among CDER chemists and microbiologists, and between CDER reviewers and field investigators, chemists and microbiologists.

3. Managing and coordinating the efforts of the CDER chemistry, and microbiology technical committees and working groups including:

    - Technical committee and working group structure, function and membership;
    - Assignment of projects; and
    - Review and approval of final technical committee and working group work products before transmission to CDER management for clearance and approval.

4. Promoting and coordinating workshops and other extramural activities related to CMC issues.

5. Promoting internal research related to CMC activities.

- **CMC CC Chair(s) are responsible for:**

1. Bringing upper management perspective to the guidances, policies, and procedures under development and to the resolution of chemistry, microbiology, and associated regulatory issues.

2. Advising the Deputy Center Director for Pharmaceutical Science about the status of CMC CC projects and issues.

3. Facilitating the CMC CC meetings and the decision-making process.

4. Approving CMC CC documents, on behalf of OPS, in the CDER clearance process.

5. Serving as CDER representative(s) to ORA's Field Drug Committee and CMC CC representative(s) to the Compliance Coordinating Committee.

- **CMC CC Members are responsible for:**

1. Providing input on issues before CMC CC.

2. Participating in the CMC CC decision-making process.

3. Serving as liaison to assigned technical committees and working groups. In this capacity the CMC CC members may attend meetings and/or review periodic reports from the technical committee or working group Chairs. CMC CC members do not *manage* the activities of the technical committees or working groups; that is the responsibility of the technical committee or working group chairs. Rather, the CMC CC members serve as facilitators and as resources for advice or problem solving as necessary.

4. Acting as the CMC CC reviewer for assigned documents for the purpose of clearing documents through CMC CC.

- **Project Manager is responsible for:**

1. Tracking the status of projects and informing CMC CC, technical committees, and working groups of the progress.

2. Facilitating the clearance and approval process for CMC CC documents including acting as the liaison to the Regulatory Policy Staff.

3. Assisting in the preparation of meeting agendas.

4. Providing editorial and scientific comments, as appropriate, on documents as well as being a source of information regarding FDA's good guidance practices (GGPs).

5. Interacting with the CMC CC chairs.

- **Executive Secretary is responsible for:**

1. Scheduling CMC CC meetings.

2. Preparing the agenda for and summary minutes of each CMC CC meeting and making them available to CDER chemists and microbiologists and other appropriate FDA staff.

3. Maintaining organizational information (e.g. organizational charts, directories).

4. Tracking action items.

- **CMC CC Permanent Observers are responsible for:**

1. Providing input on topics before CMC CC when requested.

- **CMC CC Other Observers are responsible for:**

1. Providing input on topics before CMC CC when requested.

2. Clearing their attendance with their team leader or supervisor, as appropriate, and informing the executive secretary of their attendance in advance of the CMC CC meeting.

- **Technical Committees and Working Groups are responsible for:**

1. Developing guidances, policies, and procedures as needed. The documents should be circulated for comment in CDER and, if appropriate, other FDA organizations to obtain the input of all who may be affected by them. CMC CC concurrence shall be obtained before the guidances, policies, and procedures are submitted to management for clearance/approval.

2. Developing guidances in accordance with GGPs. Policies and procedures should be developed in the format of, and documented in, the Manual of Policies and Procedures (MAPP).

3. Serving as a source of advice and assistance to CMC CC on issues that come before CMC CC.

4. Responding, as needed, to questions from the public. However, all requests to document chemistry and microbiology policy, regardless of origin, should go through CMC CC or the ONDC and OGD division directors before a technical committee or working group initiates work and/or issues their response.

- **Chairs of Technical Committees and Working Groups are responsible for:**

1. Obtaining approval from CMC CC prior to initiating work on projects including development of guidances, policies, and procedures.

2. Creating and maintaining an up-to-date list of projects and assignments, other than guidance development, that the committee has undertaken such as setting up public meetings or workshops, responding to industry questions or special CMC CC assignments; and reporting on these projects and assignments at CMC CC meetings. Guidance development tracking activities will be performed by the project manager.

3. Informing CMC CC, through the project manager and executive secretary and, if appropriate, the CMC CC liaison, of issues hindering progress on the technical committee's or working group's projects and assignments and target completion dates that will not be met. The technical committee or working group Chair should send an e-mail to the project manager and executive secretary and, if applicable, the CMC CC liaison. The e-mail should include the following information: (1) the target completion date that the technical committee or working group will miss; (2) a brief explanation of the barriers or issues that are impeding the technical committee or working group's progress; and (3) a proposal for a new target date. The e-mail should be sent when the technical committee or working group recognizes that they will not meet the target date, preferably no later than the first of the month in which the *missed* target date falls.

   For guidance development, the project manager should be informed of the completion of any guidance milestones as soon as they occur. If a target date for completing a guidance milestone is not going to be met for a current milestone that the technical committee/working group controls solely (e.g., "write draft guidance", "revise draft after internal comments", or "revise draft after public comment") the project manager should be informed as soon as possible (see above).

4. Obtaining input on policy documents from the chemistry and microbiology division directors and team leaders and other appropriate FDA staff, and revising the document based on the comments received, before the documents are forwarded for CMC CC review. Advising CMC CC of the significant comments that were received and the major revisions made to the documents.

5. Obtaining input from affected FDA organizations outside CDER for issues with far-reaching implications. The CMC CC will determine whether or not documents should go outside CDER for review, but the technical committee or working group is responsible for sending, tracking, and following-up with the organizations outside CDER.

6. Obtaining public input on guidances in accordance with GGPs and revising the documents, as appropriate, based on the comments received before the documents are forwarded for CMC CC review. Advising CMC CC of the

significant comments that were received and the major revisions made to the documents.

7. Clearing changes in the membership or objectives of a technical committee or working group through CMC CC.

8. Scheduling and conducting meetings of the technical committee or working group, as necessary, to fulfill objectives. To implement this responsibility, the Chair prepares an agenda and distributes it to the members in advance of each meeting.

9. Preparing brief minutes of each meeting, filing the meeting minutes electronically (see procedures) and notifying CMC CC of their availability, or distributing them via e-mail to CMC CC.

10. Maintaining copies of all records of meetings and other deliberations.

11. Reporting as requested to the CMC CC on the activities of the technical committee or working group. Usually a technical or working group will be requested to report at least twice annually, but this may vary depending on the priorities of CMC CC projects. In preparation for each report, the Chair should provide to the CMC CC executive secretary, at least a week in advance of the meeting, background material for the meeting, which may include information such as an updated task list, a summary of achievements since the last report to the CMC CC, a projection of activities for the next six months, and a list of issues for which CMC CC input is needed.

12. Participating in the design and implementation of CDER/industry training programs to facility implementation of industry guidances.

13. Representing the technical committee or working group at public conferences or workshops. Usually this involves giving public presentations.

14. Ensuring that all technical committee and working group members are given an adequate opportunity to participate in projects.

- **Vice-Chairs of Technical Committees and Working Groups are responsible for:**

1. Assisting the Chair in his/her responsibilities.

2. Assuming the Chair's responsibilities when necessary.

- **Members of TCs/WGs are responsible for:**

1. Regularly attending the meetings of the technical committee or working group and accepting and completing assignments relating to the technical committee or working group projects. With concurrence of the Chairperson, members can send an alternate to those meetings they can not attend.

2. Participating in the design and implementation of CDER/industry training programs when such programs are needed.

3. Representing their Division's/Office's views on issues considered by the technical committees or working groups.

PROCEDURES

- **Communications with Microbiology and Chemistry Office Directors, Division Directors, Deputy Division Directors, Supervisors, Team Leaders, and Reviewers.** The activities of the CMC CC will be communicated to the ONDC and OGD office directors, division directors, deputy division directors, supervisors, team leaders, and reviewers through distribution and electronic filing of the CMC CC, technical committee and working group meeting minutes, meetings, and/or other means.

    1. Information regarding CMC CC meetings will be filed on the CDER common drive (X) as follows:

        - CMC CC meeting schedule:

          X:\COORCOMM\CMCCC\MEET\SCHEDULE

        - CMC CC agenda:

          X:\COORCOMM\CMCCC\MEET\AGENDA\YEAR-MONTH-DAY (Example: X:\COORCOMM\CMCCC\MEET\AGENDA\98-06-29).

        - CMC CC meeting minutes:

          X:\COORCOMM\CMCCC\MEET\YEAR-MONTH-DAY (Example: X:\COORCOMM\CMCCC\MEET\98-06-29).

    2. Technical committee or working group meeting minutes shall be filed on the CDER common drive (X) under X:\COORCOMM\CMCCC***\YEAR-MONTH-DAY (Example: COORCOMM\CMCCC\GELATIN\MEET\96-02-20). "***" should be replaced with the subdirectory(ies) established for each of the technical committees or working groups under CMCCC\.

3. Routine meetings for chemistry/microbiology team leaders and/or reviewers in ONDC and OGD will serve as the mechanisms for facilitating communications between the CMC CC and the team leaders and reviewers.

- **Mechanism for Bringing Issues Before CMC CC:** A person may raise issues to the CMC CC by: (1) first raising them at routine team or division chemistry or microbiology meetings or (2) bringing them to the attention of their own team leader, the appropriate technical committee or working group Chair, or CMC CC members, project manager, or executive secretary.

  Issues to be brought before the CMC CC should be directed, by the first of the month, to the attention of the project manager and/or executive secretary who, in consultation with the Chair(s) of the CMC CC, will schedule them for an upcoming CMC CC meeting.

- **Development of Guidances, Policies and Procedures:** Guidances should be developed in accordance with GGPs using the current standard format (see MAPP 4000.2). Policies and procedures should be developed in the format of, and documented in, the Manual of Policies and Procedures (see MAPP 4000.1).

- **Updating of Project Status:** Approximately once a month, the CMC CC project manager/executive secretary will meet with the CMC CC Chair(s) to report on the status of CMC CC projects and provide reports to the CMC CC members and technical committee and working group Chair(s). Approximately once a quarter, the project manager/executive secretary and CMC CC Chair(s) will meet with the DCDPS.

- **Creation of New Technical Committees or Working Groups**. Suggestions for the creation of technical committees and working groups should be made in writing to the CMC CC.

  Each suggestion should be accompanied by a statement of the proposed objectives of the technical committee or working group, the names of persons who might serve on the committee as members and as Chair and Vice-Chair, the expected frequency of meetings and the technical committee's or working group's expected life (e.g., three months, on-going). See Attachment A for suggested format.

  The CMC CC will determine whether the technical committee or working group should be established. A list of current technical committee or working group members will be maintained by the CMC CC.

- **Membership Selection**. The CMC CC will notify ONDC and OGD chemistry and microbiology reviewers and other affected CDER staff of the creation of new chemistry or microbiology-related technical committees or working groups or vacancies on existing committees or groups. OPS staff interested in volunteering to join a technical committee or working group will inform their team leader and their chemistry division director, the

ONDC Associate Director for Microbiology Division or other supervisory staff, as appropriate. CMC CC, with supervisory concurrence, will select members from the pool of volunteers based upon their qualifications, expertise, their workload, and the demands on their time from membership on other committees or other work obligations. ONDC and OGD will be represented on each technical committee and working group whenever necessary and/or possible.

- **Disbandment of Committees or Working Groups**. CMC CC will disband a technical committee or working group if (1) it reaches the end of its scheduled lifetime, (2) it has fulfilled its objectives, or (3) the CMC CC determines that the technical committee or working group is not fulfilling a necessary function in the Center.

  At least once per year, the CMC CC shall review the list of technical committees and working groups to determine whether any on the list should be disbanded or the members, Vice-Chair or Chair changed. If, after discussions with the Chairperson of the technical committee or working group, it appears that a technical committee or working group no longer performs a useful function, the CMC CC shall issue a notice that the technical committee or working group has been disbanded. A copy of this notice will be filed in the appropriate subdirectory on the CDER common drive with the title "FINAL" (X:\coorcomm\cmccc****\FINAL) "***" should be replaced with the subdirectory established for each of the technical committees or working groups under CMCCC\.

EFFECTIVE DATE

This MAPP is effective upon date of publication.

Attachment A

RECOMMENDATION FOR THE CREATION OF A CDER CHEMISTRY OR MICROBIOLOGY TECHNICAL COMMITTEE OR WORKING GROUP

1. **Name of Committee:**

2. **Objectives:**

3. **Composition:**

   Chairperson:

   Vice-Chair:

   Membership:

4. **Meeting Frequency:**

5. **Completion Date:**

Concur:_____ Non-Concur:_____

_____ _____

Co-Chairperson, CMC CC Date

Concur:_____ Non-concur:

_____ _____

Co-Chairperson, CMC CC Date