REVIEW MANAGEMENT

GENERAL PROCEDURES:

(A) INTERACTING WITH SPONSORS AND REVIEWING INDs FOR OVER-THE-COUNTER (OTC) DRUG PRODUCTS MARKETED OR TO BE MARKETED UNDER THE AUTHORITY OF AN APPROVED NDA [EITHER AS INITIAL MARKETING OR AS AN Rx-to-OTC SWITCH];

(B) INTERACTING WITH SPONSORS AND REVIEWING NDAs FOR OVER-THE-COUNTER (OTC) DRUG PRODUCTS MARKETED OR TO BE MARKETED UNDER THE AUTHORITY OF AN APPROVED NDA [EITHER AS INITIAL MARKETING OR AS AN Rx-to-OTC SWITCH];

(C) POSTAPPROVAL OVERSIGHT OF OTC DRUG PRODUCTS MARKETED UNDER THE AUTHORITY OF AN APPROVED NDA

CONTENTS

PURPOSE This MAPP establishes Office of Review Management (ORM) procedures for: (1) assessing INDs and marketing applications for OTC drugs to be marketed under the authority of an approved NDA, either initially or as an Rx-to-OTC switch. This MAPP also addresses postapproval oversight responsibilities for OTC drug products marketed under the authority of an approved NDA.

BACKGROUND

ORM has not had clear procedures or well-defined responsibilities related to overseeing products marketed or to be marketed OTC under the authority of an approved NDA. ORM needs a transparent, efficient, clearly defined process that includes all parties in the Center with relevant expertise in the development of these products, their review for marketing approval, and their postapproval regulatory oversight.

DEFINITIONS

- **Rx Drug Product.** A drug product approved for marketing that can only be obtained with a prescription (Rx) from an appropriately licensed health care practitioner.

- **OTC Drug Product**. A drug product marketed for use by consumers without the intervention of a health care professional (a prescription) in order to obtain the product (hence, an "over-the-counter" product). Two main post-1938 regulatory pathways exist for the legal marketing of such products: (1) marketing in compliance with either a tentative final or final OTC monograph, or (2) marketing under the authority of an approved product-specific new drug application (NDA) or abbreviated new drug application (ANDA).

- **Rx to OTC Switch.** This refers only to OTC marketing of a product that was once a prescription drug product for the same indication, strength, dose, duration of use, dosage form, population, and route of administration.

- **Initial Marketing of a Drug Product OTC.** This category of product could be one of two types: (1) OTC marketing of a product that was never previously marketed as a prescription drug product or (2) OTC marketing of a product in a strength, dose, route of administration, duration of use, population, indication, or dosage form different from ones previously approved for prescription use.

- **SPMS.** Supervisor, Project Management Staff. This is the individual who is the first line supervisor for the project management staff in each review division in ORM. (Sometimes referred to as "Supervisory CSO" or "Chief, Project Management Staff".)

- **SSMRD**. Specific Subject Matter Review Division. Those ORM review divisions with primary oversight over a group of drugs directed at physiologically categorized disease entities (e.g., cardio-renal drug products,

neuropharmacologic drug products). This terminology is used in this MAPP simply to distinguish this group of review divisions from the Division of OTC Drug Products.

- **DODP.** Division of Over-the-Counter (OTC) Drug Products. This division is also a new drug review division within ORM.

- **Clinical Investigation.** Any experiment in which a drug is administered to one or more human subjects. [See 21 CFR 312.3(b)]

- **Experiment**. Any use of a drug except for the use of a marketed drug in the course of medical practice. [See 21 CFR 312.3(b)]

- **OTC Drug Actual Use Study.** A clinical trial that is usually controlled in which a drug is used by subjects under OTC-like conditions.

- **OTC Label Comprehension Study.** A study to evaluate proposed OTC drug product labeling. In such studies, no drug product is dispensed to patients. Such a study is not a clinical investigation.

- **DDMAC.** The Division of Drug Marketing, Advertising, and Communications. This is the division responsible for the oversight of drug promotion activities. It is not a part of ORM functionally, but rather reports to the Associate Center Director (Medical Policy).

- **Advisors and Consultants Staff.** The staff responsible for the organization of the external advisors and consultants to CDER. This staff reports directly to the Deputy Center Director (Review Management) and is a part of the immediate office of ORM.

- **Bi-divisional/both offices**. Throughout this document, any reference to a "bi-divisional" meeting or to "both" division or office directors should be understood to mean whatever number of divisions or offices are involved in the oversight of a given application if more than two.

POLICY

- ORM is responsible for the IND assessment of, the marketing application review of, the final action decision on, and the postapproval oversight of OTC drug products marketed or to be marketed under an approved NDA.

- Marketing an OTC product under an approved NDA has special characteristics not usually associated with Rx marketing of a drug product. ORM recognizes

the unique characteristics of the drug development programs and of the marketing applications for these OTC products. Review procedures for such products must reflect both the expertise in the SSMRDs of those with product- and disease-specific expertise and the expertise in DODP of those involved in the day-to-day oversight of drugs marketed to consumers. Both of these perspectives are essential to complete a review and take action on these products. Neither should be considered secondary to the other in procedure, in fact, or in spirit. ORM's procedures for handling OTC products marketed or to be marketed under an approved NDA should include participation by both SSMRDs and DODP.

- The primary responsibility for all matters regarding OTC drug monographs (e.g., promulgation, petitions) resides with DODP and the Director of the Office of Drug Evaluation V (ODE V). It is expected that subject matter experts in the other review divisions, DDMAC, OEB, OPS, and the Office of Compliance will be consulted, as needed, to assure consistency in scientific decisions and administrative processes. This MAPP, however, only concerns OTC drug products marketed or to be marketed under approved NDAs.

  N.B. NDAs filed pursuant to 21 CFR 330.11 or NDAs filed only because a certain dosage form is required to be marketed under the authority of an NDA to assure manufacturing quality will be filed directly to DODP. DODP will be responsible for the review and disposition of these NDAs and will consult other ORM and Center units as their expertise is needed in the evaluation of these applications. Generally, it is expected that any new product-specific medical issues would be consulted with the appropriate SSMRD. Generally, for these applications, it is assumed that the basic decisions on clinical efficacy and safety would have already been made through the monograph process.

- Insulin products are exempt from the provisions of this MAPP. Because they are not OTC drug products used by the general public, their oversight (IND assessment, marketing applications review, and post-marketing oversight) will remain with the Division of Metabolic and Endocrine Drug Products.

- Protocols for OTC drug actual use studies using either a presently marketed OTC drug product or an approved Rx drug product should be reviewed under an IND because the results of such usage studies could lead to significant changes in the product labeling. [See 21 CFR 312.2(b)(1)(i)]. If a sponsor wishes Agency advice and consultation on such a study protocol, a specific request for review and consultation should be submitted to an appropriate IND or NDA.

- An uncontrolled study to support OTC use of the previously approved Rx drug product should be conducted under an IND if drug is dispensed prospectively to subjects. If no drug is dispensed to subjects prospectively (e.g., for an epidemiology study), the study does not need to be conducted under an IND. However, if a sponsor wishes Agency advice and consultation on such a study protocol, a specific request for review and consultation should be submitted to an appropriate IND or NDA.

- An OTC label comprehension study does **NOT** have to be conducted under an IND. If a sponsor wishes Agency advice and consultation on such a study protocol, the protocol should be submitted to an appropriate IND or NDA with a specific request for review and consultation.

RESPONSIBILITIES

- INDs and marketing applications (either original NDAs or efficacy supplements) for OTC marketing of drug products under the authority of an NDA are handled administratively by the appropriate SSMRD with active participation on the IND and NDA review teams by appropriate staff from both the SSMRD and the DODP.

- The review of primary effectiveness data and safety results from controlled clinical trials is ordinarily, but not always, the responsibility of review team member(s) from the SSMRD.

- The review of the suitability/appropriateness of the product for OTC use (given the safety and effectiveness data) and safety experience during marketing of the Rx product (if any) is ordinarily, but not always, the responsibility of the review team member(s) from DODP.

- The review of INDs and marketing applications is generally accomplished by the formation of an IND or NDA review team in the SSMRD that includes appropriate members from DODP, OEB, and DDMAC. Once formed, the review team can decide for itself which members will review which parts of the application consistent with the general review responsibilities described previously. The review team will assure that each part of the application only has one primary reviewer. If a particular application or issue raises only narrow issues, the SSMRD and DODP may agree on smaller teams to deal with that specific application.

PROCEDURES **(See exception for NDAs submitted under 21 CFR 330.11 in *Policy* section above.)**

(A) Interacting with Sponsors and Reviewing INDs For OTC Drug Products Marketed or to Be Marketed under the Authority of an Approved NDA [Either as Initial Marketing or as an Rx-to-OTC Switch];

1. Sponsor Contact of ORM**:**

   A sponsor wishing to discuss OTC marketing of a product under the authority of an NDA should contact the SSMRD responsible for the therapeutic/pharmacologic class of such products and request a meeting. If there is an approved NDA for the Rx product, the review division handling that product would be the SSMRD responsible for oversight. The contacted division must ensure that the DODP is contacted immediately and informed of the sponsor contact.

2. Handling a Meeting Request**:**

   A meeting request on OTC marketing under an NDA should be handled by the SSMRD division per MAPP 4512.1. Unless both the directors of the SSMRD and DOPD agree that a meeting is unnecessary, a meeting should be granted. If a meeting request is denied, the reason for denying the request should be documented per MAPP 4512.1.

3. Forming the IND/Pre-NDA Assessment Team**:**

   Once a meeting is scheduled with the sponsor, a bi-divisional premeeting should occur before the meeting scheduled with the sponsor. At this premeeting, membership on the IND/pre-NDA assessment team (medical, pharmtox, chemistry, biometric, biopharm, microbiology, DDMAC, epidemiology, and project management, as appropriate) will be decided and the responsibilities of the various members will be agreed.

   Review division members on the IND/pre-NDA assessment team may come from either the SSMRD or DODP, or both, as appropriate. This is the IND/pre-NDA assessment team that will meet with the sponsor and assess any IND or pre-NDA study requirements. Study protocols will be submitted and studies conducted per the policy section of this MAPP and the IND regulations.

The following individuals (or their designees) should ordinarily attend the premeeting:

- the director of the contacted SSMRD;

- the director of DODP;

- appropriate project management staff from both divisions, including the project manager from the contacted SSMRD who will be managing the IND process for the application.

- Office level participation and participation by the Associate Center Director (Medical Policy) and the Deputy Center Director (Review Management) should be considered if it is believed that it would be helpful at this time with specific issues.

- If the issues do not require division director participation, team leaders from the SSMRD and DODP may substitute. However, as IND/pre-NDA team membership will be decided at this meeting, it is assumed the division directors will ordinarily attend.

In general (but the group at the pre-meeting may decide differently):

- A reviewer from the SSMRD should usually be responsible for matters related to design and assessment of clinical trials to assess general effectiveness and safety of the product (including controlled trials of effectiveness in the OTC or OTC-like setting). The group may decide that some or all of such reviews should be conducted by a team member from DODP.

- A reviewer from the DODP should usually be responsible for matters/studies related to the OTC situation (e.g., identification of the OTC population, drug actual use studies to determine safety of the use of the product in an OTC setting, labeling comprehension studies). The group may decide that some or all such reviews should be conducted by a team member from the SSMRD.

- Consults with OEB for epidemiologic studies and with DDMAC also should be sought, as appropriate. In such cases, inclusion of OEB and DDMAC staff on the IND/pre-NDA

assessment team is highly recommended.

A written record of these assignments (in the form of minutes of the meeting or a memorandum signed by both division directors) should be placed in the appropriate administrative file.

The primary administrative responsibility for assuring the coordination of this process rests with the director of the contacted SSMRD. This IND/pre-NDA assessment team will be project managed by a project manager from the SSMRD. As the IND is filed to the SSMRD, the director of the SSMRD will have the final authority to impose clinical holds, if necessary, on this IND, as per the regulations and appropriate MAPPs.

4. Premeeting Preparation:

Background material from the sponsor will be distributed to all premeeting participants.

At the premeeting, the assessment team should identify issues, resolve differences of opinion on issues, and designate the Agency person responsible for conducting the meeting, and the Agency person responsible for preparing meeting minutes.

5. Meetings/Agreements with Sponsors:

Meetings with the sponsors will be conducted per MAPP 4512.1 and meeting minutes must be concurred with by both office directors (if they are present) or by both division directors, both of whom generally should be present at sponsor meetings. Agreements reached at a sponsor meeting may not be altered without the agreement of both division directors. In general, meeting agreements with sponsors should be honored unless there is significant scientific reason not to do so. Simple personal preference or lack of attendance at a meeting when an agreement was made are not sufficient reasons in themselves to abrogate previously documented agreements.

6. Resolving Differences of Opinion:

If differences of opinion arise regarding the development of an application for OTC marketing under an NDA that cannot be resolved by the two division directors, the matter should be referred to the

relevant office director(s), and, if necessary, to the Deputy Center Director (Review Management) for resolution. On matters of medical policy, input from the Associate Center Director (Medical Policy) should be sought. Significant issues and their resolution should be documented in a memorandum to the appropriate administrative file.

(B) Interacting with Sponsors and Reviewing NDAs for OTC Drug Products Marketed or to Be Marketed under the Authority of an Approved NDA [Either as Initial Marketing or as an Rx-To-OTC Switch];

1. Sponsor Submission of Application**:**

A sponsor wishing to market a drug product OTC under the authority of an NDA should submit the appropriate application to the SSMRD division responsible for the therapeutic/pharmacologic class of such products. This would be the SSMRD with the approved NDA (if there is one). There are several possible application formats.

- An efficacy supplement should be submitted to an approved NDA for an Rx product if the sponsor plans to switch the drug product covered under the NDA to OTC marketing status in its entirety without a change in the previously approved dosage form or route of administration (i.e., the indication, other clinical claims, dosing regimen and dosing strength could all change with the approval of such a supplement, **AND** no RX product remains on the market following approval of such a supplement);

- An original NDA which does not require the review of new pharmacotoxicologic or chemistry and manufacturing data should be submitted if the sponsor plans to have the drug product remain in Rx status for certain indications, clinical claims, or dosage strengths in addition to the proposed OTC marketing of the product. In this case, any applicable user fee would be calculated as though this were an efficacy supplement. Applications submitted under this paragraph may need a concomitant labeling supplement to make the labeling of the prescription-only product conform to any changes precipitated by the approval of the OTC NDA.

- An original NDA should be submitted if the sponsor plans to market either a new product OTC whose active substance has never previously been marketed OTC or whose dosage form has

never previously been marketed OTC. In this case, any applicable user fee would be calculated based on the appropriate original NDA fee.

2. Forming the NDA Review Team:

The SSMRD division receiving the marketing application will ensure that the DODP is immediately notified of the receipt of the application. Within 14 calendar days of the receipt of the application, the SSMRD receiving the application will ensure that a bi-divisional meeting is convened to form the NDA review team that will review the application. (This meeting does not need to occur if, after bi-divisional discussion, it is agreed that such a meeting is unnecessary, i.e., the membership of the NDA review team is already agreed.)

The following individuals (or their designees) should attend this meeting:

- The director of the SSMRD receiving the application;

- The Director of DODP;

- The SPMS of the SSMRD receiving the application;

- The SPMS of DODP;

- The project manager from the SSMRD receiving the application who will be managing the review of the application.

Other appropriate staff, including medical, pharmacotoxicologic, chemistry, biostatistical, biopharmacologic, project management, DDMAC, and epidemiologic team leaders should be included at this early stage if at all possible. Office director-level participation should be considered if it is believed such input at this stage would be helpful.

The membership of the primary review team will be determined at this meeting and the review responsibilities of the members of the primary review team will be agreed. The same members from the SSMRD and DODP who were on the IND/pre-NDA assessment team should usually be on the NDA primary review team if at all possible. The review team will then conduct its initial filing review of the application for discussion at the 45 day ("filing") meeting.

In general (but the group at this meeting may decide differently):

- A reviewer from the SSMRD should usually be responsible for the review of clinical trials to assess general effectiveness and safety of the product including controlled trials of effectiveness in the OTC or OTC-like setting. The group may decide that some or all of such reviews should be conducted by a team member from DODP.

- A reviewer from the DODP should usually be responsible for the review of studies related to the OTC situation (identifying the OTC population, drug actual use studies to determine safety of the use of the product in an OTC setting, labeling comprehension studies). The group may decide that some or all of such reviews should be conducted by a team member from the SSMRD.

- Consults for review of epidemiologic studies and DDMAC also should be sought, as appropriate. In such cases, inclusion of OEB and DDMAC staff on the NDA review team is highly recommended.

A written record of these assignments (in the form of minutes of the meeting or a memorandum signed by both division directors) will be placed in the application administrative file.

3. Managing and Tracking the Review:

Once the review team is formed, the review of the application will proceed as usual. The review process will be managed by a project manager from the SSMRD division receiving the application. The primary administrative responsibility for ensuring the coordination of this process rests with the director of the SSMRD to which the application was filed. The review of the application will be tracked by the Center (with regard to user fee performance goal attainment) like all other applications assigned to the review division receiving the application. A project manager from the division receiving the application will be the primary contact point between the sponsor and ORM. To minimize confusion and maximize efficiency, all communications between ORM and the sponsor should be coordinated by the appropriate project manager in the SSMRD division receiving the application.

Although this application will be logged officially in COMIS only once (as part of the review responsibilities of the SSMRD), all such applications and the user fee due dates will be considered to be applicable to and the responsibility of both the SSMRD and DODP.

4. Meeting with the Sponsor During the Review Process:

Meetings (including face-to-face, formal teleconferences, and videoconferences) with the sponsor during the review process should include all pertinent members of the NDA review team. Generally, representatives from both the SSMRD and DODP should be present (if not present already as members of the NDA review team). Minutes of such meetings will be written and shared with the sponsor per MAPP 4512.1. Minutes will be signed by a representative of both the SSMRD and DODP, and distributed to all members of the NDA review team, to the directors of the SSMRD and DODP, and to all applicable office directors. Agreements reached at a meeting with a sponsor may **NOT** be altered without the agreement of both division directors, and, in general, meeting agreements with sponsors should be honored unless there is significant scientific reason not to do so.

5. Supervisory Review and Decision Making:

The following paragraph does not imply a change from the goal of concurrent primary and supervisory reviews. Rather the following paragraph explains the overall process and the responsibilities for decision-making at various stages in the review process of these applications. These authority designations aside, it should be understood that disagreements at these stages could benefit from discussions with the Associate Center Director (Medical Policy), the Deputy Center Director (Review Management) and the Center Director prior to final action at any level, and such discussion is encouraged if it is believed that it would be helpful.

When the primary discipline reviews and discipline team leader reviews are completed, these final reviews will be forwarded for supervisory concurrence to the director of the SSMRD receiving the application and the director of DODP. If both division directors concur with the review recommendations, an action packet and appropriate action letter will be prepared by the SSMRD for review, concurrence, and final signature on the action letter by the applicable division directors (i.e., both the SSMRD and DODP directors) or office director(s) - the level of sign-off

as appropriate for the type of application. Any action letter on an initial OTC marketing or Rx-to-OTC switch must have the signatures of both division directors or office director(s) (as appropriate).

Depending on the type of application, the authority for final sign off on a marketing application is delegated by regulation to the division or office level.

- The authority to approve a product for initial OTC marketing and for initial Rx-to-OTC switch for the first in a class of products is delegated to the office director level.

- The authority to approve products that are **NOT** first in their class for Rx-to-OTC switch is delegated to the division director level.

Generally, the following precepts will be followed with respect to decision making responsibilities:

- If the product requires office-level final sign off, the decision on whether or not to allow OTC marketing under the authority of an NDA is delegated to both the director of ODE V and the director of the office in which the SSMRD receiving the marketing application is located. If the SSMRD is also in ODE V, the director of ODE V has sole responsibility. In cases where there is disagreement between the two office directors, the matter will be decided by the Deputy Center Director (Review Management).

- If the product requires division-level final sign off, the decision on whether or not to allow OTC marketing under the authority of an NDA is delegated to both the director of SSMRD receiving the application and the director of DODP. In cases where there is disagreement between the two division directors, the matter will be decided by the office director(s). In cases where there is disagreement between the two office directors, the matter will be decided by the Deputy Center Director (Review Management).

If a decision is made to approve OTC marketing of a drug product under the authority of an NDA, proposed labeling of the product will be considered initially by the primary marketing application review team,

by both division directors, and by the office director(s), as appropriate. In matters of labeling where there is disagreement, the director of DODP (for applications signed off at the divisional level) or the director of ODE V (for applications signed off at the office level) will have final decision making authority. All proposed OTC labeling should usually also be consulted to DDMAC and the Division of OTC Labeling Compliance for their recommendations.

6. Advisory Committees:

An application for an RX-to-OTC switch or for initial OTC marketing of a drug product should usually be presented to a joint meeting of the Non-prescription Drugs Advisory Committee and the advisory committee with specific clinical subject matter expertise. In the case where the switch product is another in a line of similar products already switched, where there are no new or outstanding issues, and where the decision to switch the first in the line of these similar products was presented to the advisory committees and the committees recommended approval of the switch, it will not usually be necessary for the application to be presented to any advisory committees prior to approval. This determination should be made at the office level and conveyed as early as possible to the sponsor by letter with an explanation. If the office directors cannot agree on the issue of holding the advisory committee meeting, the decision will be made by the Deputy Center Director (Review Management).

In addition, with agreement of the applicable office directors, a joint advisory committee meeting may be replaced by a meeting of one of the advisory committees with significant representation of the other committee present as special voting members. Usually, at least 25 percent (including the Chair) of the committee from which significant representation is sought must attend as voting members. Any member from that committee who wishes to attend may do so.

It is the responsibility of the Advisors and Consultants Staff (ACS) to facilitate and organize these advisory committee meetings. For joint advisory committee meetings, the chairs of both committees will co-chair the meeting. The lead committee executive secretary will be determined by the director of the ACS, based on workload considerations, but both executive secretaries will be actively involved. The chairs of both committees will be consulted in the preparation of the agenda and the development of the questions to be posed to the

committees.

7. Labeling Content and Format:

   Labeling of OTC drug products marketed under approved NDAs must conform with general Code of Federal Regulation (CFR) OTC labeling requirements.

   It is **NOT** necessary for OTC drug products marketed under the authority of an approved NDA to conform to wording/labeling in OTC drug monographs for similar products. Nonetheless, every effort should be made to keep labeling for the NDA products as similar as possible to similar monographed OTC drug products. This will minimize both consumer confusion and advertising misadventures.

8. Disposition If Decision Is Not to Approve**:**

   If the decision is made **NOT** to approve OTC marketing of a drug product under the authority of an NDA, the previously approved Rx-only application, including the "not approved" efficacy supplement or "not approved" original NDA, remains the responsibility of the SSMRD that approved it as a prescription drug.

(C) Postapproval Oversight of OTC Drug Products Marketed under the Authority of an Approved NDA

1. Postapproval NDA Oversight**:**

   When an action letter is signed approving OTC marketing of a drug product under the authority of an NDA, the approved NDA becomes the oversight responsibility of the DODP. The NDA administrative file and records will be transferred from the SSMRD that received the application to DODP. The SPMS from the SSMRD will coordinate with the SPMS from DODP to convey all NDA documents to the document room of DODP. This change in oversight responsibilities will be noted in COMIS.

   - Chemistry supplements for these postapproval products under the oversight of the DODP will be reviewed by the reviewing chemists collocated in one of the SSMRDs located in the Corporate Boulevard ORM location.

- If the sponsor should request further OTC claims or variations on the original claim, the bi-divisional review of such requests as outlined previously in this MAPP will occur as for original switch decisions. However, DODP would be the receiving division as the NDA would then be located there. Nonetheless, the bi-divisional review team and the bi-divisional sign-off jurisdiction would apply.

- Any pharmacology, biopharmaceutics, or biometric issues not covered by the preceding paragraph should be consulted to the pharmacologists, biopharmaceutists, or statisticians collocated in the SSMRD that previously had oversight of the product or has oversight of similar products.

If the sponsor continues marketing of the active substance in an Rx product presentation, the NDA(s) covering these Rx product presentations remain under the oversight of the original SSMRD oversight division.

2. Postapproval Sponsor Safety Reporting Responsibilities**:**

The sponsor of a newly approved NDA for OTC marketing of a drug product should ordinarily to submit quarterly postmarketing periodic safety reports unless specifically relieved of this responsibility in the approval letter (21 CFR 318.80(c)(2)). The action letter should detail whether or not quarterly postmarketing periodic safety reporting is expected of the sponsor. FDA may propose changes to the post-marketing safety reporting requirements that might result from the International Conference on Harmonisation (ICH) negotiations. If codified, timing of reports could change in the future. Until such changes are finalized in the Code of Federal Regulations, sponsors should submit postapproval safety reports per the present requirements.

In conjunction with the staff in the Office of Epidemiology and Biostatistics and in consultation as needed from other areas of the Center and Agency, DOPD will have responsibility for oversight of these safety reports and further revisions of the product's OTC labeling.

3. Oversight Responsibilities for Previously Approved OTC Drug Products Marketed under the Authority of an NDA**:**

On the effective date of this MAPP, a process will begin through which

all NDAs for products marketed OTC under the authority of an approved NDA will ultimately become the oversight responsibility of DODP. Under this process, NDAs for previously approved OTC products will be transferred to DODP on an office-by-office basis, starting with ODE V. Sponsors will be notified when one of their NDAs is so transferred. Until sponsors are so notified, the NDA remains the responsibility of the SSMRD where it is presently located. Once transferred, the NDAs will be maintained and overseen as per the processes outlined in paragraphs 1 and 2 immediately above.

EFFECTIVE DATE

This MAPP is effective upon date of publication.