M & G Consulting Pty Ltd

Michele Houldsworth

CDx identification guide
Box 2: * consider expanding the question to include "for...", as follows "...solely to determine compatibility for..." eg "for matching donor blood/cell/tissues to a potential recipent". Box 3: * assumes that the pivotal study has already been conducted. Some manufacturers may be planning the prospective trial and evaluating conformity assessment pathways. Consider "Was/will testing in the pivotal trial consistent..." Boxes 3 and 4: * consider removing exclusive reference to "pathology" tests, as there may be other biochemical assays that in Australia are conducted in a Pathology Lab but overseas conducted in a Clinical Lab. These manufacturers may mistakenly answer no.
Companion testing plan
* The role of the plan is useful. The explanation of the role and it's consequences appears unnecessarily complex. Consider simplifying eg; "The companion testing plan should provide a cross-reference to 1) a concurrent CDx application OR 2) a concurrent CDx notification (or the lab's name, address, NATA no.). Alternatively where 1-2 are not possible, and CDx testing is available by other means (eg foreign lab testing services or subsequent IVDs/CDx approvals) the testing plan should: 3) identify other means to provide CDx testing. TGA may provide a limited-term exemptions only under certain under certain circumstances, and in order to ensure supply of therapies for unmet needs. Such circumstances include the therapeutic sponsor taking responsibility for conduct of the CDx at the foreign lab. These circumstances will also require review of all relevant CDx data as part of the therapeutic application [insert list of evidence required]. For therapies where a CDx is not required, the companion testing plan should: 4) provide this rationale." * Suggest elaborating on how the therapeutic sponsor might "take responsibility". It's also unclear whether the companion testing plan without a concurrent CDx application would simply enable Rx approval vs not enable Rx supply. * It's not clear under which circumstances * Terminology - suggest consistency between "IVD testing", "CDx testing" and "companion testing" which are used interchangeably. Then "IVD identified in companion testing plan" vs "clinical trials assay".
Case studies
Yes. * there may be a confusing typo in the title of Case study 2 and 3. Suggest delete "part of" e.g. "Inclusion of a drug monitoring IVD that was not used as <delete "part of"> the clinical trial assay for a medicine (a subsequent IVD)."
Further feedback
1. Typo - On p4 in section "Which medicine or biological indications require CDx testing?", bullet 2 may benefit from clarification eg inserting "selecting or monitoring" as shown below: "...the IVD claims that it is intended for [selecting/monitoring] the relevant use of the medicine or biological.". 2. Clinical Trial Applications - This guidance is beneficial for manufacturers ready to prepare

marketing authorisations, however does not address clinical trial use of CDx assays. Clarification of circumstances where device-specific Clinical Trial Applications might (or might not) be required (in addition to the therapeutic Clinical Trial Application). This would be very helpful to those sponsors planning trials and continuing to foster Australian participation in global clinical investigations.

3. Bridging for subsequent CDx and case studies - it's not clear from the bridging descriptions whether it is expected that there be a re-analysis of the primary outcome data from the clinical trial.

4. Subsequent CDx/IVD definition - this could benefit from further clarification regarding it's previous approval status. Eg. "A CDx or IVD that is currently listed on the ARTG for a different intended use. This device also was not used in the clinical trial but is intended for CDx use with the same medicine and indication as the CTA."

5. Abridged evaluations p7 - It is unclear if abridged evaluations be reviewed through the therapeutic application or if a separate CDx application is still mandatory (though abridged). Also there's a typo in reference to FDA requiring a "Premarket Assessment" which should read "Premarket Approval".