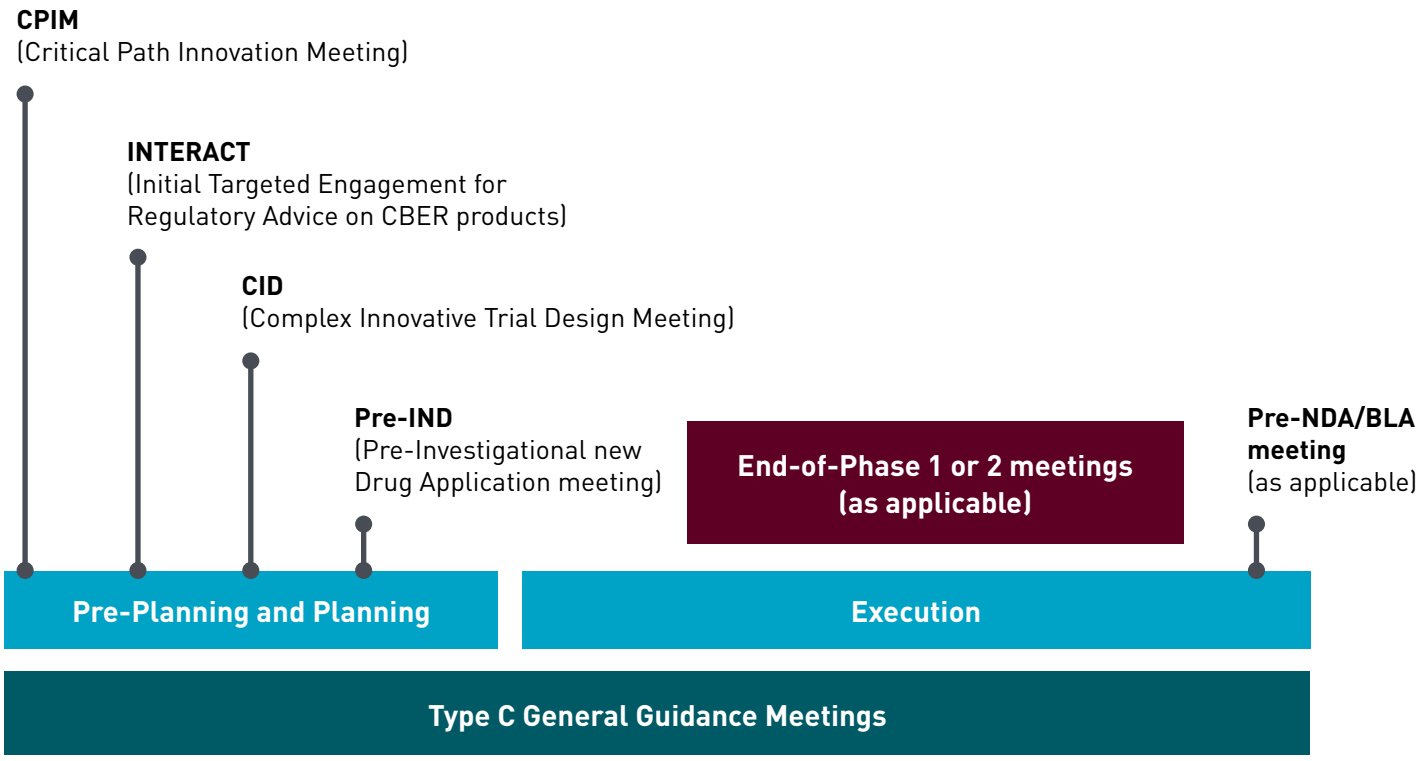
Master Protocol FDA Engagement Tool

Master protocol studies uniquely entail:

- Complex trial design and statistical analysis considerations
- Multiple therapeutic agents, whether monotherapy or in combination, are evaluated
- Rapid accumulation of safety data, assessment of safety data during study conduct
- Study conduct (data management, communication of safety data, etc)
- Biomarker development

Given these distinctive aspects, early and frequent interaction with U.S. Food and Drug Administration FDA is necessary for the successful development of a U.S. master protocol study. Sponsors can use this tool to help interact with FDA during the pre-planning and planning stages of a master protocol development and proactively develop their FDA engagement strategy.

The diagram below illustrates critical FDA engagement milestones in a master protocol study*, wherein flexible engagement mechanisms such as Type C General Guidance Meetings facilitate early and frequent interaction throughout the pre-planning and planning phase (see "Mechanisms" chart below for additional considerations).



** Please note: Organizations can use a combination of different meeting types in the pre-planning and planning stages of study development to seek input from FDA. This document is not intended to describe a prescriptive order, but rather describes a range of mechanisms that can facilitate early interaction.*

MECHANISMS FOR EARLY FDA INTERACTION		
Meeting Type	**Description**	**Link to more info**
Type C Meeting	Can be held before Pre-Investigational New Drug (Pre-IND) meetings or anytime afterward, and provides general guidance on selected topics. Type C meetings can address a broad range of issues.	https://www.fda.gov/media/109951/download
Pre-IND	Fosters early communication between sponsors and drug review divisions to provide guidance on the data necessary to warrant IND submission.	https://www.fda.gov/drugs/investigational-new-drug-ind-application/pre-ind-consultation-program
Critical Path Innovation Meeting (CPIM)	Enables discussion of a methodology or technology proposed by the sponsor. It also allows CDER to provide advice on how this methodology or technology might enhance drug development.	https://www.fda.gov/drugs/new-drugs-fda-cders-new-molecular-entities-and-new-therapeutic-biological-products/critical-path-innovation-meetings-cpim
Complex Innovative Trial Design Meeting Program	Provides support with the goal of facilitating and advancing the use of complex adaptive, Bayesian, and other novel clinical trial designs (an IND or Pre-IND is required prior to requesting).	https://www.fda.gov/drugs/development-resources/complex-innovative-trial-designs-pilot-program
INTERACT (Initial Targeted Engagement for Regulatory Advice on CBER products)	Specific to biologic products, enables sponsors to obtain preliminary informal consultation with the agency at an early stage of development prior to a pre-IND meeting.	https://www.fda.gov/vaccines-blood-biologics industry-biologics/interact-meetings-initial-targeted-engagement-regulatory-advice-cber-products

Relevant FDA Guidances

- Master Protocols: Efficient Clinical Trial Design Strategies to Expedite Development of Oncology Drugs and Biologics
- Formal Meetings Between the FDA and Sponsors or Applicants of PDUFA Products
- Best Practices for Communication Between IND Sponsors and FDA During Drug Development