ALS Drug Development Guidance Document

FDA guidances are official documents that explain the agency’s interpretation of, or policy on, a regulatory issue. The FDA prepares guidances primarily for industry, but also for other stakeholders and its own staff, and uses them to address such matters as the design, manufacturing, and testing of regulated products; scientific issues; content and evaluation of applications for product approvals; and inspection and enforcement policies.

In many rare diseases, ALS included, certain factors can be critical in the regulatory review process for candidate therapies such as a smaller number of patients for clinical trials, various disease mechanisms, patient-reported outcomes, and the benefit-risk profile of individuals with ALS. Currently, there is no FDA Guidance specific to ALS product development that would address these issues for sponsors or other interested stakeholders. Such a document could significantly facilitate and speed ALS therapy development, as well as enhance the consistency and quality of the application review process, while also encouraging more industry partners to enter the field.

The technical challenges are formidable for bringing a new therapy to people with ALS and can take as long as 15 years at a cost of $2 billion. As a result, every effort needs to be made to improve and accelerate the drug development process. Regulatory requirements are a significant dimension of this effort and an area where the patient and caregiver perspective is increasingly important.

The resources made possible by the Ice Bucket Challenge have enabled The ALS community to bring together others from throughout the community to create the first patient-focused guidance for ALS product development that will be submitted to the FDA. The initiative includes the active participation of the entire ALS community. Other ALS organizations are involved along with industry, clinicians and researchers, the National Institutes of Health, the Centers for Disease Control and Prevention and, most importantly, people with ALS and their families. The FDA has been engaged throughout the process of developing the guidance so that this initiative is having an impact even before it is completed.

The guidance is a consensus-based work product that incorporates stakeholder views in areas such as trial design, biomarkers, surrogate endpoints, patient-reported outcomes, benefit-risk, and others. The guidance will serve as a roadmap to help industry navigate the development process and provide the FDA with an ALS community-centered view of how the Agency should approach therapies for ALS.

The goals are to make the drug development process, including clinical trials, more efficient, more predictable, faster and more effective at assessing efficacy much earlier. This will speed access, reduce costs, help ensure resources are most effectively utilized and incentivize industry
to enter the ALS market and develop new treatments for ALS. The guidance initiative also includes a parallel effort to update ALS clinical trial guidelines that were developed more than 15 years ago.

The ALS community established a framework to guide the development of the guidance. This includes:

- A steering committee that oversees development of the guidance and is comprised of the chairs of the guidance workgroups and other subject matter experts;
- Workgroups that oversee specific chapters of the guidance and which are comprised of 5-10 subject matter experts per workgroup. Each workgroup has representation from a variety of perspectives (eg, industry, academia, et.al.) and includes at least one patient representative; and
- A Patient and Caregiver Advisory Committee that advises the steering committee. The committee includes people with ALS, caregivers, family members and other ALS organizations.

The ALS community believes that this initiative can make an enormous difference in the development of new treatments for ALS. It will bring the patient perspective to ALS drug development, educate both industry and FDA and help to deliver effective therapies to people with ALS as fast as possible.

**FDA Guidance: Project Structure**

![Diagram of FDA Guidance Project Structure](image)