

# FDA Alters How It Says 'Yes,' 'No' to Applications

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The Food and Drug Administration will no longer issue "approvable" or "not approvable" letters when a drug application is not approved, but will instead issue a "complete response" letter at the end of the review period, the agency announced in July.

"These new regulations will help the FDA adopt a more consistent and neutral

way of conveying information to a company when we cannot approve a drug application in its present form," Dr. Janet Woodcock, director of the agency's Center for Drug Evaluation and Research, said in a written statement.

Currently, when assessing new drug and generic drug applications, the FDA can respond to a sponsor in one of three types of letters: an "approval" letter, meaning the drug has met agency standards for safety and efficacy and can be marketed

for sale in the United States; an "approvable" letter, which generally indicates that the drug can probably be approved at a later date provided that the applicant provides certain additional information or makes specified changes (such as to the labeling); or a "not approvable" letter, meaning the application has deficiencies generally requiring the submission of substantial additional data before approval.

A "complete response" letter, which will replace options 2 and 3, will be issued

to inform the company that the review period for a drug is complete and that the application is not yet ready for approval, the statement said. The letter will describe specific deficiencies and, when possible, will outline recommended actions the applicant might take to prepare the application for approval. The way that the FDA communicates its decisions to approve an application—option 1—will not change.

The move, which went into effect in late summer, brings the process for communication about drug licensing applications in line with that of biologics, for which "complete response" letters have been used since 1998. The revision should not affect the overall time it takes the FDA to review new or generic drug applications or biologic license applications, according to the agency.

Other changes involve modifications to the schedule for reviewing amendments to licensing applications, classification of responses to a complete response letter, timelines for submitting a response to a complete response letter and administrative actions for a failure to respond, and definition of an efficacy supplement. ■

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## PERSPECTIVES IN RHEUMATIC DISEASES: MEETING THE CLINICAL CHALLENGE

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- **Autoimmunity Unbound: New Insights Into the Pathogenesis of Rheumatoid Arthritis**  
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- **Autoimmune Threats to Kidney Function**  
Jonathan Ashley Jefferson, MD, MRCP, University of Washington
- **Clinical Manifestations and Complications of Systemic Scleroderma**  
Daniel E. Furst, MD
- **Gout: What's Ahead in Disease Management**  
Robert L. Wortmann, MD, Dartmouth-Hitchcock Medical Center
- **New Paradigms in Managing and Treating Ankylosing Spondylitis**  
Tore K. Kvien, University of Oslo, Past President EULAR 2005-2007
- **Crohn's Disease and Ulcerative Colitis: Challenges of Inflammatory Bowel Disease**  
Sunanda V. Kane, MD, Mayo Clinic College of Medicine
- **Panel Discussion: Collaborative Care of Patients with Immunologic-Based Diseases: A Rheumatology/Dermatology Perspective**  
Daniel E. Furst, MD, Moderator, Kenneth B. Gordon, MD, Christopher T. Ritchlin, MD

### DERMATOLOGY ESSENTIALS FOR THE RHEUMATOLOGIST

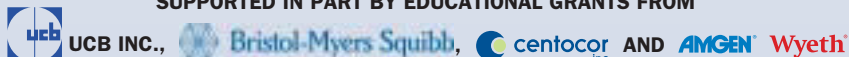
- **More Than Skin Deep: Understanding and Managing the Patient With Psoriasis**  
Kenneth B. Gordon, MD
- **Therapeutic Advances in the Treatment of Psoriatic Arthritis**  
Christopher T. Ritchlin, MD, University of Rochester School of Medicine and Dentistry
- **Rashes, Erythema, and Spots: Common Skin Disorders**  
Michael D. Tharp, MD, Rush University Medical Center
- **Weird and Worrisome: Uncommon Skin Diseases**  
Francisco Kerdel, MD, University of Miami

### PROGRAM OVERVIEW

New treatment modalities are being developed in rheumatology based on scientific research breakthroughs in immunology, cytokines, T lymphocytes, B lymphocytes, as well as genetic studies that may result in gene therapies. Rheumatologists and other health care professionals need comprehensive knowledge of the latest developments and techniques in diagnosing and treating rheumatic disorders to ensure the highest standards of patient care. Rheumatologists need to have an understanding of dermatologic co-morbidities that often appear in their patients.

\*Program subject to change.

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### TUITION

Physicians	<del>\$495</del>	<b>\$395</b>
Residents/NPs/PAs	<del>\$325</del>	<b>\$225</b>

### ACCOMMODATIONS

**Hilton Fort Lauderdale Beach Resort**  
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1 (954) 414-2222: Mention *Rheumatology News Perspectives in Rheumatic Diseases* group to receive the special rate of \$239 plus tax.

### TARGET AUDIENCE

This continuing medical education conference is designed for rheumatologists, nurse practitioners, and physician assistants.

### LEARNING OBJECTIVES

At the conclusion of this conference, participants will be able to:

- Identify the recent advances in the diagnosis, management, and treatment of rheumatic diseases
- Discuss the link between rheumatoid arthritis and inflammatory bowel diseases
- Apply the most current information concerning the pathophysiology of rheumatic disorders to patient care plans
- Recognize and differentiate common as well as rare skin diseases relevant to rheumatic diseases

### ACCREDITATION STATEMENT

This activity has been planned and implemented in accordance with the Essential Areas and Policies of the Accreditation Council for Continuing Medical Education (ACCME) through the joint sponsorship of the Elsevier Office of Continuing Medical Education (EOCME) and Skin Disease Education Foundation (SDEF). The EOCME is accredited by the ACCME to provide continuing medical education (CME) for physicians.

### AMA PRA CREDIT DESIGNATION STATEMENT

The EOCME designates this educational activity for a maximum of 11 *AMA PRA Category 1 Credit(s)*™. Physicians should only claim credit commensurate with the extent of their participation in the activity.

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## Women at More Risk of CVD From Smoking

MUNICH — Women who smoke tend to have their first acute MI considerably earlier in life than do male smokers.

This observation in a Norwegian case-control study suggests that smoking increases the risk of cardiovascular disease to a relatively greater degree in women than in men, Dr. Morten Grundtvig said at the annual congress of the European Society of Cardiology.

Women smokers lose more than twice as many years of good health as do men, added Dr. Grundtvig of Innlandet Hospital, Lillehammer, Norway.

He reported on 1,784 consecutive patients, of whom 38% were women, who presented with a first MI during 1998-2005. Thirty-nine percent of the men and 23% of the women were current smokers.

Smoking women experienced their first MI 15 years prematurely, while men who smoked had their first MI 8 years prematurely. Specifically, the average age at which men had their first MI was 64 years in current smokers, 75 years in ex-smokers, and 72 years in nonsmokers. The age differential was far greater among the women; the first MI occurred at age 66 years in current smokers, 74 years in ex-smokers, and 81 years in nonsmokers.

After adjustment for differences in hypertension, diabetes, and other cardiovascular risk factors, 13.7 years of the age difference between women with an MI who smoked and those who never smoked were attributed to smoking. In men, the adjusted difference was 6.2 years, according to Dr. Grundtvig.

—Bruce Jancin