MEMORANDUM OF MEETING MINUTES

Meeting Date: November 3, 1999
Time: 2:00 PM
Location: 9201 Corporate Blvd, Rm. S300

Type of Meeting: Open Feedback, Healthcare Antiseptic Drug Products

Meeting Chair: Debbie Lumpkins

Meeting Recorder: Kerry Rothschild

FDA Attendees, titles, and Office/Division:

Office of Drug Evaluation V (HFD-105)
Robert DeLap, M.D., Ph.D., Director

Division of Anti-Infective Drug Products (HFD-520)
David Bostwick, Clinical Reviewer
Albert Sheldon, Jr., Ph.D., Microbiology Team Leader
Maureen Dillon-Parker, Regulatory Project Manager

Division of Over-The-Counter Drug Products (HFD-560)
Linda Katz, M.D., M.P.H., Deputy Director
Daiva Shetty, M.D., Medical Officer
Andrea Leonard-Segal, M.D., M.S., Medical Officer
Debbie Lumpkins, Team Leader
Robert Sherman, Biologist
Stephanie Mason, Interdisciplinary Scientist
Kerry Rothschild, Regulatory Project Manager

Division of Biometrics III (HFD-725)
Aloka Chakravarty, Ph.D., Deputy Director
Daphne Lin, Ph.D., Statistical Team Leader
Li Ming Dong, Ph.D., Statistical Reviewer
Joel Jiang, Ph.D., Statistical Reviewer

External Constituent Attendees and titles:
Jenan A-Altrash, Director Human Health & Safety, Soap and Detergent Association (SDA)
Elizabeth Anderson, Assistant General Counsel, Cosmetic, Toiletry, and Fragrance Association (CTFA)
Chris Armstrong, Section Manager-Regulatory Affairs, Proctor & Gamble Company
Joyce Beauchamn, Group Leader, Microbiology, Cosmair
James Bowman, Statistician, Hill Top Research, Inc

Mike Dolan, Vice President, Research & Development, GoJo Industries
Tom Donegan, Vice President, Legal and General Counsel, CTFA
Judith Farrand, SDA General Counsel, Baker & Hostetler LLP
George Fishler, Manager, Microbiology, The Dial Corp.
Joyce Graf, Director, Environmental Science, CTFA
Lorraine Lillis, Regulatory Affairs Associate, Colgate-Palmolive Co.
Mack Morrison, Manager of Technology, Colgate-Palmolive Co.
Gayle Mulbery, Technical Director, Microbiology, Hill Top Research, Inc.
Jerry Newman, Director, Product Development, Johnson & Johnson Medical
Carol Resch, Regulatory Affairs Manager, Unilever
Steven Richards, Director, Laboratory Sciences, Stephens and Associates, Inc.
Mark Rosengarten, Director, Regulatory and Biomedical Affairs, Playtex Products, Inc.
Sue McAllister, Clinical Researcher, 3M
Teresa Skog, Regulatory Manager, 3M
Rhonda Jones, President, Scientific and Regulatory Consultants
Ann Marie Delostrino, Attorney, Hyman, Phelps, and McNamara
Jonathan Radow, Reporter, F-D-C Reports
Richard Crider, Reporter, WBII
Mary Bruch, Consultant, Micro Reg Inc.
Kimberly Adams, Regulatory Affairs, Steris-Labs
Jean Grieve, Regulatory Affairs, Bath and Body Works
Christine Shank Regulatory Affairs, Galderma Labs
Irene Malbin, Regulatory Affairs, CTFA
Anna Longwen, Regulatory Affairs, Beckton Dickenson
Carrie Hay Gregory, Regulatory Affairs, CTFA
Marie DeVito, Microbiologist, Avon
Kitty Kono, Washington Representative, ASTM
Bryan Ruble, Regulatory Affairs, The Dial Corp.
Mary Vihstadt, Washington Representative, The Dial Corp.
Gayle Borovian, Microbiologist, Johnson & Johnson Consumer
Barbara Westphal, Product Development, Nice-Pak Products
Ann Young, Regulatory Affairs, Nice-Pak Products
Irwin Butensky, Senior Vice President, Biomedical and Administrative Services, Playtex
Michael Counts, Regulatory Services, Lonza

Meeting Objectives:

CHPA/SDA requested this meeting in order to reach agreement with the Agency regarding the process for, as well as specific recommendations associated with, the development of finished product testing methodology for topical antimicrobial drug products.

Discussion Points (bullet format):

1. Does the Agency agree that neutralization of the active ingredients is required in the first and subsequent sampling steps for all protocols?

Conclusions: Additional data are required. The agency is especially concerned about how this would affect the evaluation of persistence endpoints. The agency is available to work with industry to develop protocols to generate comparative data. These protocols will address the neutralization issue as it applies to healthcare personnel handwashes, surgical scrubs, and pre-operative preps.

2. Does the Agency agree that the purpose of the statistical analysis of the efficacy data is to demonstrate the ability of a finished product to meet or exceed an established performance standard and not to demonstrate equivalency to a control product?

Conclusions: The agency agrees. The purpose of the positive control required by the TFM is not intended to demonstrate equivalence to the control product, but to validate the study design and procedures. The Agency acknowledges that the statistical methods proposed in the TFM need to be re-evaluated.

3. What is the Agency's view on restricting the efficacy methods detailed in the Final Rule to methods that evaluate finished product?

Conclusions: In order to characterize the effectiveness of a finished product, it is necessary to evaluate data from in vitro, Minimum Inhibitory Concentration (MIC), and Time Kill studies. However the agency agrees that it may not be necessary to require MIC and Time Kill studies on the active ingredient when evaluating each formulation. The agency will consider this point further. Industry should develop a flow chart detailing their position on this issue.

4. What is the Agency's view on the industry proposal to require Time Kill analysis of finished products and to eliminate MIC testing for finished products?

Conclusions: The agency would need additional information in support of the industry proposal. A summary paper regarding the time kill data would be useful. Using Time Kill testing may be appropriate, but need to work out details, including use and type of indicator organisms.

5. Does the Agency agree that the Cup Scrub Test should be included in the Final Monograph as a test method for the evaluation of transient and/or resident organism on the body?

Conclusions: The Agency agrees, in principle, that the cup scrubbing technique can provide worthwhile information. However, additional information, including the protocol and data from

studies conducted are needed.

6. Does the Agency agree that in the Final Monograph third party consensus standard setting organizations such as the ASTM are the best means for establishing standardized, accurate and current methods for finished product testing?

Conclusions: The agency agrees that it would be highly desirable to have the test methods easily updated to keep the methods current. However, there are regulatory constraints that need to be addressed. The agency considers ASTM a worthwhile resource and will explore how to use that resource in the future.

7. In the Final Monograph, does the Agency intend to reference third party consensus methodology without requiring additional modifications?

Conclusions: The agency bears ultimate responsibility for determining appropriate testing methods, and would not be likely to defer to consensus standards.

8. Does the Agency have any additional concerns with industry's proposed testing for topical antimicrobial drug products?

Conclusions: Additional information is needed for the Agency to identify a comprehensive list of concerns and questions. Resources permitting, the Agency will develop a feedback letter to address additional concerns.

Agreements Reached:

1. Positive controls are not to be used to compare effectiveness of final formulations. Rather, positive controls are intended to validate test methodologies.

2. Ideally, standards relating to testing need to be living standards, which can change and develop with changing science and methodologies. The agency will explore ways to accomplish this goal.

3. Products should be designed and tested for the situation (and indication) for which it is intended to be used.

Action Items:

	Item	Responsible Person	Due Date
1.	Feedback letter (Resources permitting)	FDA	End of year, 1999

Minutes Preparer: Kerry Rothschild for 6/12/00

Chair Concurrence: Debbie Lumpkins 6/12/00