

# Development of a Target Product Profile – EUA Issues

Lawrence Stanberry, M.D., Ph.D.  
Associate Dean for International Programs  
Professor of Pediatrics  
Vagelos College of Physicians & Surgeons

*Vaccines, from concept to implementation*  
*(GLHL 7209) – January 19, 2021*



COLUMBIA UNIVERSITY  
IRVING MEDICAL CENTER

I am a paid member of the Pfizer COVID-19  
vaccine Data Monitoring Committee



# TPP – Element 14

## Registration and Prequalification

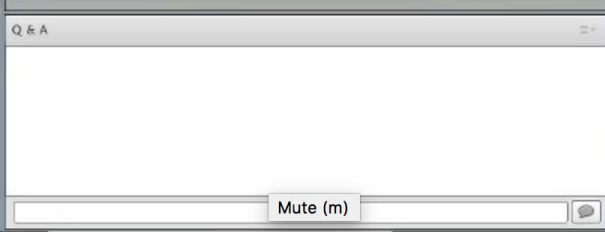
Type of license- e.g. is it experimental

WHO	US FDA
WHO prequalified and/or meets criteria for EUAL (Emergency Use Assessment & Listing Procedure.	Emergency Use Authorization, Expanded Access Program.

EUA requires detailed information on efficacy, short term safety and manufacturing processes.

# Vaccines and Related Biological Products Advisory Committee December 10, 2020

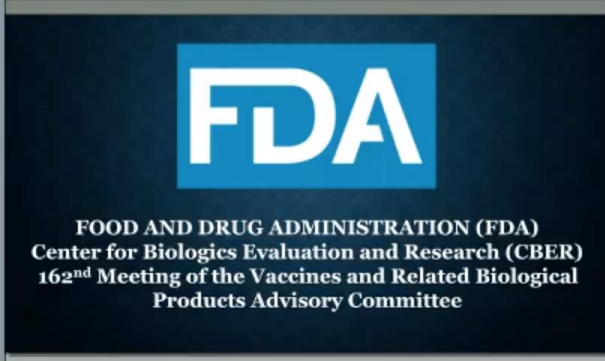
- <https://www.fda.gov/advisory-committees/advisory-committee-calendar/vaccines-and-related-biological-products-advisory-committee-december-10-2020-meeting-announcement>



## FDA Expectations for Further Evaluation



- Issuance of an EUA for a COVID-19 vaccine would be contingent upon the ability to conduct further vaccine evaluation through a combination of:
  - Active follow-up of vaccine recipients under the EUA
  - Passive monitoring for clinically significant adverse reactions using established reporting mechanisms (e.g., VAERS)
  - Observational studies, including those that leverage healthcare claims databases
  - Continuation of blinded, placebo-controlled follow-up in ongoing clinical trials for as long as is feasible and strategies to handle loss of follow-up
- FDA does not consider issuance of an EUA for a COVID-19 vaccine to necessitate immediate unblinding of ongoing clinical trials or offering vaccine to all placebo recipients
  - Trial participants may choose to withdraw from follow-up for any reason, including to receive vaccine made available under EUA

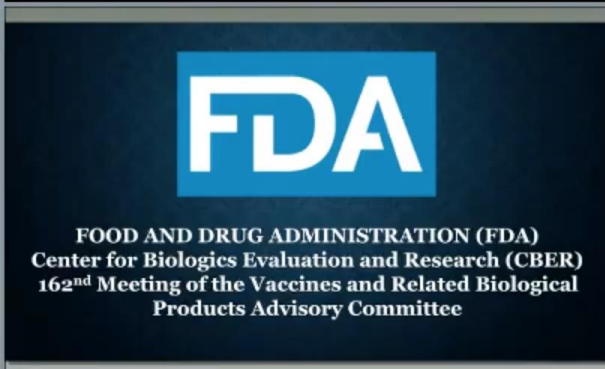


Q & A

## What is “owed” to placebo participants.

- Accurate information about the EUA, if granted.
- Freedom to withdraw.
- That they won't be denied vaccine if it becomes otherwise available to them through societal prioritization and local availability.
- Not immediate vaccination in the trial before their turn is called outside of the trial.
- Not necessarily unblinding on demand.
- Potentially, higher priority for vaccine *within their societal prioritization group*.





## Pfizer proposal re continuation

- Offer vaccination to placebo participants > 16 who become eligible for receipt of BNT162b2 according to local or national recommendations. Unblind upon request, and offer vaccine as part of the study.
- Regardless of unblinding, all placebo recipients to be offered vaccination at 6 months and followed for 18 mos. [FDA brief]
- Pharmacovigilance: HERO, DOD, VA, Health care workers, VAERS

“We have an ethical responsibility to inform all ongoing study participants of the availability and eligibility criteria of any COVID-19 vaccine made available under an EUA. We will appeal to participants to remain in the ongoing Phase 3 study as originally randomized for as long as possible, ideally until a COVID-19 vaccine has full regulatory approval following the accumulation of 6 months of safety follow-up data after Dose 2. The study team responsible for study conduct would remain blinded ...”

*But unblinding participants destroys the randomization.....*



**Questions?**