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Review Article



Regulatory requirements for Vaccine registration in United States

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ABSTRACT

Vaccination is one among the foremost cost-efficient health interventions out available, saving a lot of individuals from illness, incapacity, and death annually. No alternative countermeasures are effective in reducing or eliminating the prevalence of infectious diseases reminiscent of measles, mumps, rubella, smallpox, and diphtheria. Vaccines are products of biological origin that exhibit some inherent variability. They are characterized by advanced manufacturing processes and are administered to a huge number of healthy youngsters, adolescents, and adults. Their quality cannot be assessed by testing the ultimate product alone. The vaccine industry is highly regulated. Vaccines development may be an advanced and long method. Before a new vaccine is approved for release into the market, a rigorous restrictive procedure to assess quality, effectiveness, and safety should be undertaken. The Office of Vaccines Research and Review (OVRR) at the Center for Biologics Evaluation and Research (CBER), U.S. Food and Drug Administration (FDA) are responsible for the regulation of Vaccines. Current authority for the regulation of vaccines is in Section 351(a) of the Public Health Service Act (PHS). Throughout the lifecycle of development, from preclinical studies to licensure, vaccines are subjected to rigorous testing and oversight. Manufacturers should adhere to good manufacturing practices and management procedures to make sure the quality of vaccines.

Keywords: Vaccines, USFDA, CBER, OVRR, BLA, VAERS.

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1. Introduction

Vaccines are a novel category of Pharmaceutical products that meet the definition of a drug and biological product. Pharmaceutical products that meet the definition of a drug and biological product. They are the foremost significant contributions to public health. No alternative medical countermeasures are as effective in reducing or eliminating the incidence of infectious diseases comparable to measles, mumps, rubella, smallpox, and diphtheria. A Vaccine is a biological preparation that improves immunity to a selected disease. A Vaccine generally contains associate agent that resembles a disease-causing micro-organism, and is commonly made up of weakened or killed varieties of the microbes, its toxins or its surface proteins. Vaccination is one of the best public health achievements, reducing morbidity and mortality from a broad vary of vaccine-preventable diseases. A vaccine may be a substance that is introduced into the body to stop infection or to control disease to a

definite infectious agent that may be a disease-causing organism. The Vaccine teaches the body a way to defend itself against the infectious agent by making associate immune reaction. The Vaccine industry is highly regulated. Vaccine development is an advanced and long method. Before a new vaccine is approved for release into the market, a rigorous regulative procedure to assess quality, effectiveness and safety should be undertaken. The regulative system features a responsibility to guard and promote the general public health, to make sure the protection and effectiveness of vaccines as a result of the injection of ineffective and poor quality of product typically will cause terribly serious issues even death and undermine the confidence within the health system, health professionals, pharmaceutical manufacturers and distributors. The Center for Biologics Evaluation and Research (CBER) of the US Food and Drug Administration (FDA) is the administrative unit liable for guaranteeing the protection, purity, and efficacy of

vaccines within the United States. The review of Vaccine applications happens among CBER's Office of Vaccine Research and Review, Office of Compliance and Biologics Quality, and Office of Biostatistics and Epidemiology. Advisory Committee on Immunization Practices (ACIP), a group of medical and public health specialists develops vaccination recommendations. ACIP makes recommendations for:

- ✓ Condition to provide a Vaccine
- ✓ The variety of doses required and also the time between doses
- ✓ Who ought to and who may not get the vaccine (1-3).

Regulations and Guidance documents

The CBER is liable for regulating vaccine products, facilitating the development, approval, and availability of safe and effective products of the FDA. Once Congress enacted Biologics Management Act, additionally called the Virus-Toxin Law. The rule underneath this act contains the key ideas for regulation of biological,

analogous to necessary facility inspections and batch certification guidelines. The CBER derives its legal authority to control vaccines and biologics from section 351 of the Public Health Service Act and also the Food, Drug, and Cosmetic Act. The public health service act is enforced through the Code of Federal Regulations (CFR), which contains the overall and permanent rules issued within the Federal Register by the executive departments and agencies of the Federal government. The rules that apply specifically to licensure of vaccines and biologics are under Title 21 CFR 600 through 680. Title 21 contains alternative relevant rules applicable to vaccines as well as labeling, adequate and well-controlled clinical trials, institutional review boards, and protection of human subjects, nonclinical laboratory studies, and Current Good Manufacturing Practices (cGMPs). Regulatory legislation has evolved over time to fulfill scientific advances within the pharmaceutical industries. During the past 20 years, these laws have provided CBER to facilitate its drug and biologics review processes; ultimately bringing to the market safe and effective vaccines, and biological products (4, 5).

Table 1 Acts and Regulations relevant to Vaccine Development (6, 7)

Public Health Service Act (42 USC 262-63) sec. 351
Food, Drug and Cosmetic Act (21 USC 301-392)
Title 21 CFR
21 CFR 600-680: Biological product standards
21 CFR 314 (21 CFR 601.25[d] [2], specific biological): Adequate and well-controlled trials.
21 CFR 312: Investigational new drug application
21 CFR 210-211: Good Manufacturing Practices
21 CFR 58: Good Laboratory practices
21 CFR 56: Institutional review boards
21 CFR 50: Protection of human subjects Prescription Drug User Fee Act (PDUFA) of 1992, 2002, and 2007
Food and Drug Agency Modernization Act (FDAMA) of 1997
Food and Drug Agency Amendments Act (FDAAA) of 2007

Table 2 FDA and ICH Guidance documents relevant to Vaccine development (7)

Manufacturing, product testing, and CGMPs
FDA guidance for industry: Characterization and qualification of cell substrates and other biological starting materials used in the production of viral vaccines for the prevention and treatment of infectious diseases.
FDA guidance for industry: Development of preventive HIV vaccines for use in pediatric populations.
FDA guidance for industry: Considerations for plasmid DNA vaccines for infectious disease indications.
FDA guidance for industry: Content and format of chemistry, manufacturing and controls information and establishment description information for a vaccine or related product.
ICH Q10 Pharmaceutical quality system.
FDA draft guidance: Process validation—general principles and practices.
Clinical studies FDA guidance for industry: Clinical data needed to support the licensure of pandemic influenza vaccines.
FDA guidance for industry: Clinical data needed to support the licensure of seasonal inactivated influenza vaccines.
FDA guidance for industry: Toxicity grading scale for healthy adult and adolescent volunteers enrolled in preventive vaccine clinical trials.
Toxicity assessments of vaccines ICH S5a detection of toxicity to reproduction for medicinal products and toxicity to male fertility.
ICH S6 Preclinical Safety Evaluation of Biotechnology-derived Pharmaceuticals

The Prescription Drug User Fee Act

The Prescription Drug User Fee Act (PDUFA), was enacted in 1992, that granted the FDA authority to gather user fees from manufacturers to accelerate the review of drug and biological applications and post-market drug-

safety activities in accordance with performance goals developed by the FDA. The legislation was later reauthorized in 1997 (PDUFA II), 2002 (PDUFA III), and 2007 (PDUFA IV). Additionally, to reauthorizing and supplementing the PDUFA, the new law provided the FDA with new funding to gather, develop, and review

safety data and develop adverse-event-surveillance systems and analytical tools (8).

FDA Modernization Act of 1997

The FDA Modernization Act (FDAMA) of 1997 is related to the regulation of food, drugs, devices, and biological products by the FDA. It revived PDUFA user fees and performance goals and provided extra funding to support drug pre-market review activities. These changes were made in order to recognize the changes in the way the FDA would be operating in the 21st century. The main focus of this is the acknowledgment in the advancement of technological, trade, and public health complexities. In addition, the law provides for a distended database on clinical trials, which will be accessible by patients. With the sponsor's consent, the results of such clinical trials are enclosed in the database (9).

Food and Drug Administration Amendments Act of 2007

The Food and Drug Administration Amendments Act (FDAAA) of 2007 provided significant reform to the regulation of drugs and biologics. It additionally mandated that merchandise for post-approval Risk Evaluation and mitigation strategy (REMS) is needed to have the REMS submitted to their license application. In addition to reauthorizing and expanding the PDUFA, the new law provided the FDA with new funding to collect, develop, and review safety information and develop adverse-event-surveillance systems and analytic tools. (10)

2. The Regulatory review Process

Vaccine development may be an advanced and long method. Before a brand new vaccine is approved for unleashing into the market, a demanding regulatory procedure to assess quality, safety and efficacy should be undertaken. FDA's Center for Biological Evaluation and Research (CBER) is liable for control vaccines within the US. Current authority for the regulation of vaccines is in Section 351(a) of the Public Health Service Act (PHS). A multidisciplinary review team, comprising of a regulatory project manager, clinical/medical officers, product reviewers, statisticians, pharmacology/toxicology reviewers, and alternative scientific specialists with varied backgrounds in virology, bacteriology, immunology, and manufacturing technologies, reviews vaccine applications and alternative regulatory submissions in accordance with PDUFA guidelines. Various regulatory guidelines for registration of vaccines in the USA are:

- ✓ Centre for Biologics Evaluation and Research (CBER)
- ✓ Biologics License Application (BLA)
- ✓ Vaccines and Related Biological Products Advisory Committee (VRBPAC)
- ✓ vaccine adverse event reporting system (VAERS)

Vaccine development may be a long process, typically lasts for 10-15 years. Before a vaccine is authorized and dropped at the market, it undergoes a protracted and

rigorous method of research, followed by several years of testing. On average, the development is 12-15 years (11).

Stages of Vaccine Development

The general stages of vaccine development are:

- ✓ Pre-clinical stage
- ✓ Clinical development
- ✓ Regulatory review and approval process

Pre-Clinical Stage

Pre-clinical studies use tissue-culture or cell-culture systems and animal testing to assess the protection of the candidate Vaccine and its immunogenicity, or ability to arouse an immunological response. Animal subjects may embody mice and monkeys. These studies offer researchers an outlook of the cellular responses they may expect in humans. They also recommend a safe starting dose for a subsequent section of research and safe method of administering the vaccine. Researchers might adapt the vaccine throughout the pre-clinical state to make it more eloquent. They may also additionally do challenge studies with the animals, which means that they vaccinate the animals and then try to infect them with the target infective agent. Several vaccines never progress above this stage as they fail to provide the required immune response. The pre-clinical stage usually last 1-2 years and frequently involves researchers in private industry.

3. IND Application

A sponsor submits an application for Investigational New Drug (IND) to the U.S. Food and Drug Administration. The sponsor describes the manufacturing and testing processes, summarizes the laboratory reports, and describes the projected study. An institutional review board, representing an organization wherever the clinical test is going to be conducted, should approve the clinical test protocol. Food and Drug Administration has 30 days to approve the application. Once the IND application has been approved, the vaccine is subjected to 3 phases of testing (12).

Clinical development

Clinical development is a three-phase process.

Phase I Vaccine Trials

The Phase I vaccine trials involves a small group of small group of adults, usually between 20-80 subjects. If the vaccine is intended for children, researchers will first test on adults, and then gradually step down the age of the test subjects until they reach their target. These trials may be non-blinded (i.e., Placebo may be used).The goals of Phase I testing are to assess the safety of the vaccine and to determine the type and extent of immune response that the vaccine provokes.

Phase II Vaccine Trials

Phase II vaccine trials, involves several hundred subjects, to evaluate the immunogenicity of the vaccine and provide an initial estimate on the common adverse events. Sponsors are encouraged to meet with the CBER for an end-of-phase-II meeting to discuss their proposed phase III study. The goals of Phase II testing are to study

the vaccine's safety, immunogenicity, dose ranging, schedule of immunizations, and method of delivery.

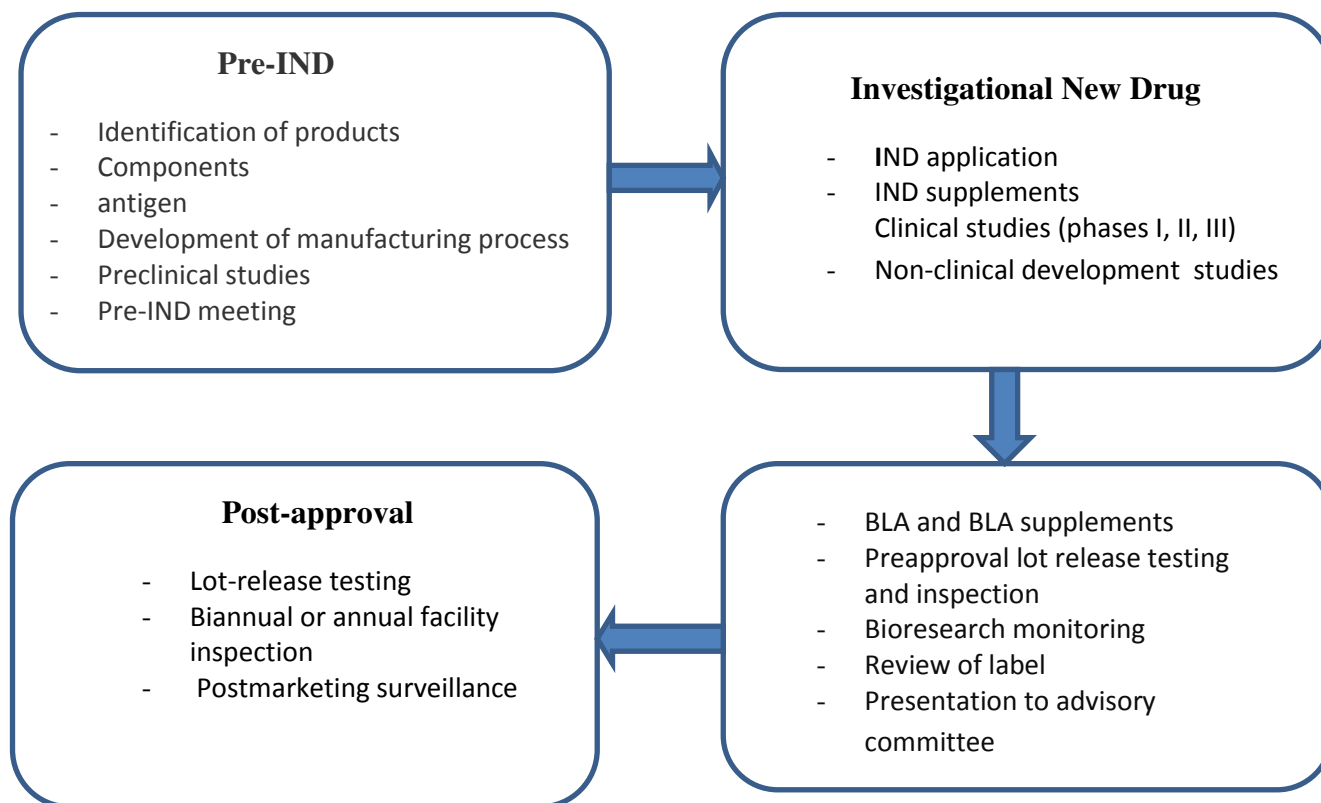


Figure 1: FDA Regulatory Review Process (7)

Phase III Vaccine Trials

After Successful completion of Phase II vaccines trails move on to larger trials, involving thousands to ten thousands of people. These Phase III tests are randomized and double-blind and involve the experimental vaccine being tested against a placebo (the placebo may be a saline solution, a vaccine for another disease, or some other substance). Phase III goal is to determine vaccine safety in a large group of people. Certain rare side effects may not be seen in the smaller groups of subjects tested in earlier phases. For example, that an adverse event related to a vaccine may occur in 1 of every 10,000 people. To detect a significant difference for a low-frequency event, the trial would have to include 60,000 subjects; half of them are in the control, or no Vaccine group (placebo).

Phase IV Trials

Phase IV trials are optional studies that drug firms might conduct after the vaccine is released. The manufacturer may extend to test the Vaccine for safety, efficacy, and different potential uses (12).

Approval and Licensure

After a successful phase III clinical trial, the vaccine developer can submit a Biologics License Application (BLA) to the Food and Drug Administration. Then the Food and Drug Administration will examine the industry wherever the vaccines are going to be manufactured and approve the labeling of the vaccine. After licensure, the Food and Drug Administration will prolong the

monitoring of vaccine production, as well as inspecting facilities and reviewing the manufacturers' tests of lots of vaccines for potency, safety, and purity. The Food and Drug Administration has the power to conduct its own testing of manufacturers' vaccines (13, 14).

Post-Licensure Monitoring of Vaccines

A variety of systems monitor vaccines after they have been approved. They involve Phase IV clinical trials, Vaccine Adverse Event Reporting System (VAERS), and the Vaccine Safety Datalink.

Vaccine Adverse Event Reporting System

The Center for Disease Control and Prevention (CDC) and Food and Drug Administration (FDA) has established the Vaccine Adverse Event Reporting System (VAERS) in 1990. The goal of VAERS, along with the CDC, is "to detect possible evidence of adverse events related to vaccines. About 30,000 adverse events are reported every year to VAERS. Between 10% - 15% of those reports describe serious medical events that end in hospitalization, severe illness, disability, or death. VAERS is a voluntary Reporting system. Anyone, like a parent, a health care provider, or friend of the patient, who suspects association between a vaccination and an adverse event could report that event and data concerning it to VAERS. The CDC then investigates the event and tries to seek out whether or not the adverse event was really caused by the vaccination. The CDC states that they monitor VAERS information to:

- ✓ Detect new, unusual, or rare vaccine adverse events
- ✓ Monitors increase in known adverse events
- ✓ Identify potential patient risk factors for specific varieties of adverse events

- ✓ Identify Vaccine lots with multiplied numbers or varieties of reported adverse events
- ✓ Assess the safety of newly licensed vaccines

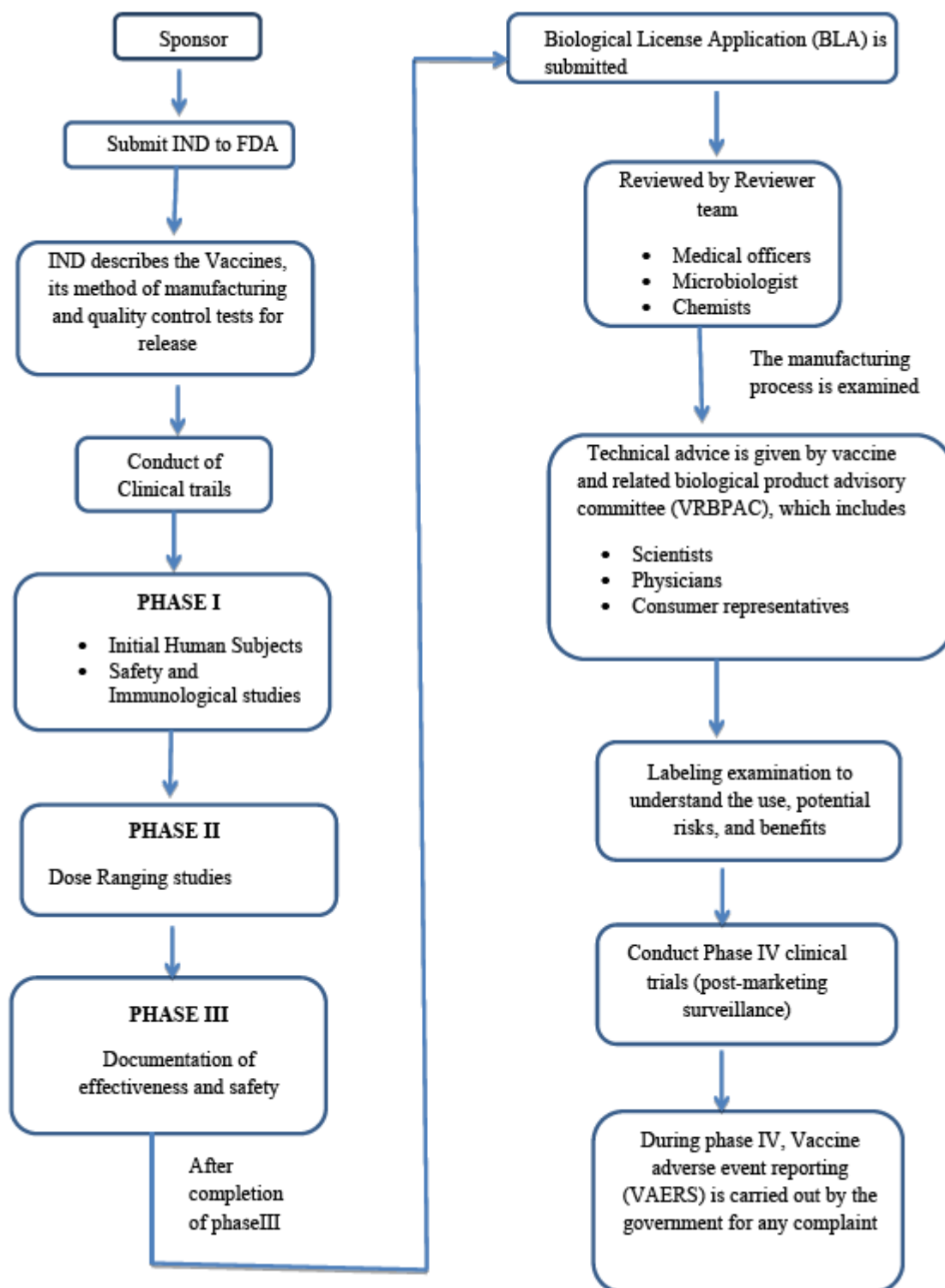


Figure 2. Application Process for Investigational New Drug (IND) to the US FDA

Not all adverse events reported to VAERS are in fact caused by a Vaccination. Probably all adverse events ensuing from vaccination are not reported to VAERS. The CDC states that several adverse events like swelling at the injection site are under-reported. Serious adverse events,

in line with the CDC, are likely to be reported than minor ones, particularly when they occur soon after vaccination. VAERS has identified many rare adverse events associated with vaccination (15).

Vaccine Safety Datalink

The CDC established this system in 1990. It is a collection of linked databases containing data from large medical groups and permits officers to collect data concerning vaccination among the populations served by the medical teams. Researchers can access the information by initiating studies to the CDC and having them approved. The VSD has some drawbacks, for, instance few unvaccinated children are listed in the database. The medical groups providing information to VSD might have patient populations that are not representative of huge populations normally. In addition, the data come not from randomized, controlled, blinded trails however from actual practice. Therefore, it's going to be troublesome to manage and evaluate the data. Rapid Cycle Analysis is a program of the VSD, established in 2005. It monitors real-time data to check rates of adverse events in recently vaccinated people with rates among unvaccinated people. This system is employed to monitor new vaccines. (15).

4. Conclusion

Vaccines are important for safeguarding individuals and communities from the mortality and morbidity associated with many infectious diseases. The FDA provides regulatory oversight throughout the complex development process, which involves extensive laboratory characterization, preclinical testing, and clinical evaluation. The primary purpose of regulations governing the United States is to safeguard public health. Stringent regulatory requirements must be achieved throughout development for a vaccine to be considered for licensure. After licensure, vaccine safety is continually monitored through lot-release testing, inspections, and product surveillance. The FDA ensures the safety, effectiveness, and availability of licensed vaccines through its extensive regulatory review mechanisms. It is the role of public regulatory authorities to ensure that pharmaceutical companies comply with regulations. Vaccines are developed, tested, and regulated in a very similar manner to other drugs. In general, vaccines are even more carefully tested than non-vaccine drugs as the number of human subjects in vaccine clinical trials is typically larger. Additionally, post-marketing surveillance of vaccines is closely examined by the Center for Disease Control (CDC) and the FDA through Vaccine Adverse Event Reporting System (VAERS).

The vaccine market place is global. Thus, manufacturers considering changes in safety or potency tests to reduce refine, or replace the use of animals must consider whether these changes will be acceptable to regulatory agencies around the world. Regulatory agencies can facilitate the adoption of alternative tests by working together to ensure these alternative methods will have global acceptance.

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Conflict of interest

The authors declare no conflicts of interest.

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