

VIA ELECTRONIC SUBMISSION

June 3, 2020

U.S. Department of Health and Human Services (HHS)
Office of the Assistant Secretary for Preparedness and Response (ASPR)
Division of the Strategic National Stockpile (DSNS)

Re: RFI # 75A50120NEXTGENSNS

Dear Sir/Madam,

The United States Pharmacopeia (USP) appreciates the opportunity to provide comments in response to the request for information (RFI) from HHS/ASPR/DSNS on the Strategic National Stockpile (SNS). USP is an independent, scientific, nonprofit public health organization founded in 1820 that works to improve health through the development of public standards and related programs that help ensure the quality, safety, and benefit of medicines and foods.

USP's public standards define quality expectations for medicines and are developed by Expert Committees and Panels, which are comprised of over 1000 independent, scientific experts and include the participation of over 100 government liaisons from the Food and Drug Administration (FDA). The *United States Pharmacopeia-National Formulary (USP-NF)* includes over 5000 documentary quality standards for drug substances and drug products.¹ Material reference standards are used in conjunction with these documentary standards to verify that a medicine and its ingredients can pass tests to ensure adherence to quality requirements. USP standards are legally recognized in the United States and are used in more than 150 countries.

Response to Section 1/Question 1 – “Do you agree with the stated objectives of the SNS? Have we missed anything major in articulating our vision?”

USP supports the objectives of the SNS and the expansion of public-private partnerships. USP believes that a contemporary SNS will need to include an appropriate volume of the most critical medicines, manufactured and maintained to quality expectations. To ensure the quality of these medicines, as well as any that are manufactured and purchased by the U.S. government during a crisis, the SNS should also include the USP material reference standards required to test these medicines.

As explained in more detail below, enabling readily available access to USP reference standards would: 1) help industry and government-funded programs expand manufacturing capacity of medicines associated with pandemics, such as COVID-19; 2) allow government agencies to evaluate the quality of medicines purchased to

¹ USP standards are developed through an open, transparent, expert-based process, offering the ability to respond to public health emergencies, adapt to new industry practices, and support evolving science and technology.

respond to a pandemic, regardless of the manufacturer or manufacturing process; and 3) help the government evaluate and ensure the continued quality of medicines in the SNS.

Response to Section 1/Question 3 – “How can your organization contribute to achieving the vision for the SNS?”

USP stands ready to help ensure that the medicines in the SNS are quality assured. Specifically, we propose that USP reference standards be part of a managed initiative that makes reference standards for stockpiled medicines available to test medicines in the SNS for their quality.² Readily available standards will enable regulators to evaluate and ensure the quality of medicines in the SNS. Moreover, a managed SNS inventory of reference standards would support industry and government-funded programs to expand the manufacturing capacity for quality medicines during a crisis. It is essential for public health and patient safety that the quality of drugs in the SNS is ensured, and reference standards are necessary to do this.

As stated above, USP public quality standards include two components that work together: documentary standards and reference standards. **Documentary standards** are substance-specific or product-specific that articulate the quality expectations for a medicine, including its identity, strength, and purity. Documentary standards also describe the tests to validate that a medicine and its ingredients meet these criteria. These are included in the *USP-NF* online platform in the form of monographs. A USP physical standard, also known as a **reference standard**, is a highly characterized specimen of a drug substance or ingredient that facilitates testing to the specifications outlined in the *USP-NF*. Reference standards are used in conjunction with documentary standards to verify that a medicine and its ingredients adhere to quality requirements.³ They are rigorously tested and evaluated by multiple independent commercial, regulatory, and academic laboratories to confirm accuracy and reproducibility.

In addition to being required for quality testing, reference standards and access thereto in a time of crisis facilitate the expeditious production of quality medicines for the SNS. USP reference standards support a manufacturer’s ability to test its products

² USP also recommends including in the SNS items such as chromatography equipment and substances (e.g., reagents) for use in conducting tests and analyses with reference standards.

³ Additional information on the use of reference standards can be found in guidances from the Food and Drug Administration (FDA) and International Conference on Harmonisation of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH). See “Analytical Procedures and Methods Validation for Drugs and Biologics,” at <https://www.fda.gov/files/drugs/published/Analytical-Procedures-and-Methods-Validation-for-Drugs-and-Biologics.pdf>; “Q6B Specifications: Test Procedures and Acceptance Criteria for Biotechnological/Biological Products,” at <https://www.fda.gov/media/71510/download>; and “Q7 Good Manufacturing Practice Guidance for Active Pharmaceutical Ingredients,” at <https://www.fda.gov/media/71518/download>.

during the drug manufacturing process. Ready access to standards – both documentary and reference – is especially needed, and in greater quantities, when drug manufacturing is increased to meet a surge in demand.

In response to increased demand for particular drug products related to the current pandemic, USP has taken steps to ensure continued operations of essential services, including the production of reference standards, to minimize disruptions and support the medicines supply chain. Looking ahead, however, it is difficult to predict all rapid increases in demand. Setting aside specific reference standards maintained at USP facilities in Maryland to support the SNS will help secure capacity and support production of critical medicines, particularly in a time of crisis. USP can work with HHS/ASPR/DSNS to determine which reference standards, and the volume of each standard, are needed for the current and evolving stockpile.

Thank you again for the opportunity to comment on this RFI. USP stands ready to work with HHS/ASPR/DSNS to help support manufacturer capacity to produce drugs that meet quality standards. For more information, please contact Carrie Harney, Senior Director, Government Affairs, Policy and Advocacy, at cxh@usp.org or (202) 239-4136.

Sincerely yours,



Anthony Lakavage, J.D.
Senior Vice President, Global External Affairs
Secretary, USP Convention and Board of Trustees
APL@usp.org
(301) 816-8334