

November 16-17, 2023

**Workshop on Gene Therapy  
Product Activity & Comparability  
& the Evaluation of T-Cells Slides**



**STANDARDS  
COORDINATING  
BODY**

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**REGENERATIVE MEDICINE**

# Standards Recognition Program for Regenerative Medicine Therapies

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FDA/CBER/Office of Therapeutic Products

*Workshop for the Identification and Standardization of Methods for Assessing Gene Therapy  
Product Activity and Comparability, and the Evaluation of T Cell Therapies*

*November 16 – 17, 2023*

# Benefits of Standards Use for Regenerative Medicine Therapies

Help facilitate consistent and predictable product manufacturing and assessment, field testing, clinical trial data exchange, and product labeling

Foster innovation and support R&D

Reduce R&D costs by building on existing standardized technologies

Eliminate redundancy, minimizing errors and reducing time to market

Improve quality, lead-time, factory flexibility, and supply chain management

Can streamline premarket review by FDA

# Standards Basics

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## U.S. National Technology Transfer and Advancement Act of 1995

<https://www.nist.gov/standardsgov/national-technology-transfer-and-advancement-act-1995>

## Definition of a Standard

**Common and repeated use of rules, conditions, guidelines or characteristics for products or related processes and production methods, and related management systems practices**

# Written/Documentary Standards

- Documents that set forth:
  - Performance characteristics
  - Testing methodology
  - Manufacturing practices
  - Scientific protocols
  - Ingredient specifications
  - Data standards
  - Terminology/Nomenclature
  - Others

## Physical Standards/Reference Materials

Material, sufficiently homogeneous and stable with respect to one or more specified properties, which has been established to be fit for its intended use in a measurement process.

*ISO REMCO Committee on Reference Materials*



# Voluntary Consensus Standards Body (VCSB)

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Develop voluntary consensus standards

Characteristics of VCSB Processes

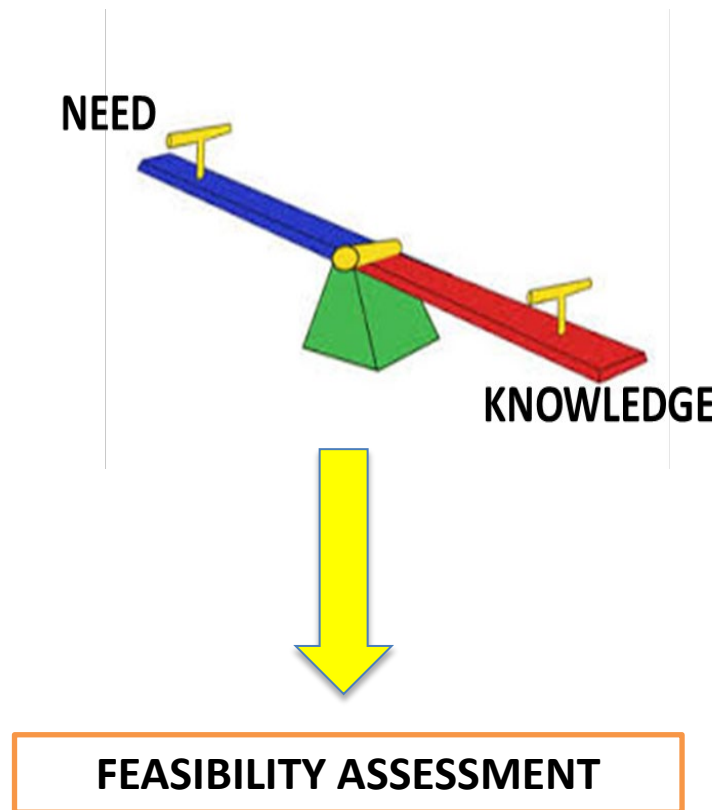
1. Openness
2. Balance
3. Due Process
4. Appeals Process
5. Consensus

OMB Circular A-119



# Balancing the Need for a Standard with the State of Science

Does the base of scientific knowledge on the subject support the development of standardized approaches to methods, testing, etc. ?



Is there consensus among the scientific community that the approaches proposed are appropriate to address the need for standardization?

# Feasibility Assessment



1. What are the possible intended and unintended consequences?
2. How does the proposed standard effect existing work?
3. Are there other efforts to develop a specific standard in other standards venues?
4. Are there experts available to draft the standard?
5. How would the standard be implemented?



# Standards Recognition Program for Regenerative Medicine Therapies (SRP-RMT)



# Voluntary Consensus Standards Recognition Program for Regenerative Medicine Therapies

## Guidance for Industry

Additional copies of this guidance are available from the Office of Communication, Outreach and Development (OCOD), 10903 New Hampshire Ave., Bldg. 71, Rm. 3128, Silver Spring, MD 20993-0002, or by calling 1-800-835-4709 or 240-402-8010, or email [ocod@fda.hhs.gov](mailto:ocod@fda.hhs.gov), or from the Internet at <https://www.fda.gov/vaccines-blood-biologics/guidance-compliance-regulatory-information-biologics/biologics-guidances>.

For questions on the content of this guidance, contact OCOD at the phone numbers or email address listed above.

U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Biologics Evaluation and Research  
October 2023

OMB control number: 0910-0338  
Current expiration date available at <https://www.reginfo.gov>.  
See additional PRA statement in Section VIII of this guidance.

Contains Nonbinding Recommendations

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# What is the SRP-RMT?

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- A program designed to identify Voluntary Consensus Standards (VCS) that facilitate the development and assessment of regenerative medicine therapy products regulated in the FDA Center for Biologics Evaluation and Research (CBER). <https://www.fda.gov/media/159237/download>
- The program fulfills requirements outlined in Section 3036 of the 21<sup>st</sup> Century Cures Act of 2016 where FDA, the National Institute of Standards and Technology (NIST), and RMT stakeholders coordinate and prioritize the development of standards that promote the development of RMTs, promote regulatory predictability and enhance regulatory review of submissions for RMTs.
- Consistent with US policy for standards (OMB Circular A-119<sup>1</sup> and NTTAA<sup>2</sup>) for promoting the use of VCS by the Federal Government.

<sup>1</sup>[https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/revised\\_circular\\_a-119\\_as\\_of\\_1\\_22.pdf](https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/revised_circular_a-119_as_of_1_22.pdf).

<sup>2</sup><https://www.nist.gov/standardsgov/national-technology-transfer-and-advancement-act-1995>.

# Voluntary Consensus Standards Body (VCSB)

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- Qualities of VCSB
  - Processes that follow openness, balance, consensus, and due process
- American National Standards Institute (ANSI)
  - Accredits Standards Development Organizations that adhere to these principles
  - Examples:
    - ATCC- American Type Culture Collection,
    - ASTM- American Society for Testing Materials
    - IEEE- Institute of Electrical and Electronics Engineers
    - PDA- Parenteral Drug Association
    - CLSI- Clinical and Laboratory Standards Institute

# Non-Voluntary Consensus Standards

## Pharmacopeial standards

- Examples: US Pharmacopeia, Japanese Pharmacopeia, European Pharmacopeia

## Accreditation standards

- Standards set forth by accreditation organizations to ensure that certain criteria are met for a specified process or system.
- Examples: Foundation for the Accreditation of Cellular Therapy (FACT), Association for the Advancement of Blood & Biotherapies (AABB)

## Standards created by institutions or societies

- Examples: International Society for Stem Cell Research (ISSCR), International Society for Cell & Gene Therapy (ISCT)



# Benefits of the SRP-RMT

## Promote

Promote the development of standards that can streamline the review of RMT products

## Identify

Assist product developers in identifying standards that have been reviewed by FDA for scientific soundness and consistency with FDA regulations and policies.

## Assist

Assist FDA reviewers in evaluating the proper use of a standard (fit-for-purpose) in a regulatory submission



How will standards be identified for consideration in the recognition program?

FDA staff serving as liaisons to SDOs can nominate standards to be reviewed for recognition

Stakeholders may request recognition by emailing the SRP-RMT at: [SRP-RMT@fda.hhs.gov](mailto:SRP-RMT@fda.hhs.gov)

- Stakeholders should provide the name of the SDO, standard designation, title, version and year published and a short rationale for recognition

# Who will evaluate the VCS for Recognition?



FDA subject matter experts will evaluate standards for:

- Complete Recognition- the entire contents of the standard is recognized
- Partial Recognition- only portions of the standard are recognized
  - FDA will identify the section(s) of the standard that are recognized.
- Standards that do not meet the criteria for recognition will not be recognized.
- Recognition is NOT required to use a standard in a regulatory submission.

# Criteria for Evaluating Standards for Recognition

The standard was developed by a VCSB

The standard does not conflict with current FDA statute, regulations, or policy

The standard is scientifically sound

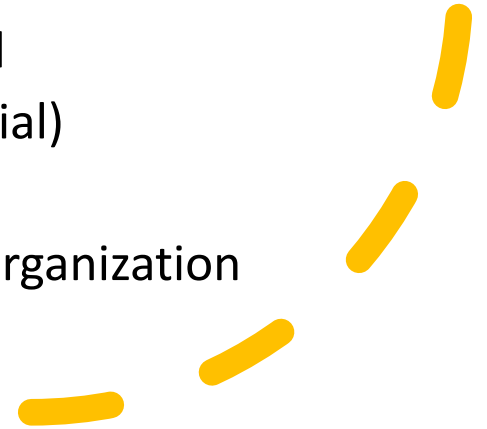
The standard may facilitate the ability of a sponsor to meet regulatory expectations

The standard can assist FDA in the assessment of a regulatory submission for RMT products



How will stakeholders know if a standard has been recognized?

- Recognized standards will be posted on the Standards Development for Regenerative Medicine Therapies page of the FDA website twice/year <https://www.fda.gov/vaccines-blood-biologics/standards-development-regenerative-medicine-therapies>
- Recognized standards will be accompanied by a Standards Recognition Sheet (SRS) that defines the terms of recognition
  - Components of the SRS:
    - CBER Assigned Recognition Number
    - Designation/title/scope of the standard
    - Extent of recognition (complete or partial)
    - Rationale for recognition
    - Name of the Standards Development Organization



# Sample Standards Recognition Summary

## CBER Recognized Standards for Regenerative Medicine Therapies Standards Recognition Summary (SRS)

**Recognition Number** (CBER Assigned) **Date of Recognition:**

### **Standard Information**

ISO XXXX, Edition YEAR

### **Scope/Abstract**

#### **Extent of Recognition** (Complete or Partial)

*(For partial recognition CBER intends to identify the parts of the standard that are not recognized)*

#### **Rational for Recognition**

*(Ex. This standard is relevant to the characterization of CAR T cells and supports existing regulatory policy.)*

#### **Standards Development Organization**

*(Ex. ISO International Organization for Standardization*

<https://www.iso.org>)



# Use of a Standard in a Regulatory Submission

- Standards use is NOT required.
- Non-recognized standards may be used if fit-for-purpose.
- Use of a standard does not preclude FDA from asking for additional information to support the regulatory evaluation of a product.
- Standards that do not meet the definition of voluntary consensus standard may be used.
- When citing a standard, the following is required:
  - Name of the SDO
  - Designation and title
  - Version and date published
  - Statement of conformity
    - Used standard as written
    - Modified the standard- description of deviations from the standard and rational for deviation

# Example of Citation of a Standard in a Gene Therapy Regulatory Submission

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**Standard:** *GTX 1234:Quantification of Nucleic Acids in a Biological Sample; 2021\**

**Possible sponsor statements in a submission:**

Methods used to quantify nucleic acids in the final product were conducted according to GTX 1234; 2021 without deviation.

OR

Standard GTX 1234; 2021 was utilized for the quantification of nucleic acids except that the method of sample preparation was modified to be more suitable for our manufacturing conditions.

\*The standard referred to in this example is hypothetical

# Take Home Message

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- Standards use is not required
- Non-recognized standards can be used in a regulatory submission
- When used, a standard must be fit for purpose
- Stakeholders may request a standard be reviewed for recognition by emailing [SRP-RMT@fda.hhs.gov](mailto:SRP-RMT@fda.hhs.gov)
- List of Recognized Standards  
<https://www.fda.gov/vaccines-blood-biologics/standards-development-regenerative-medicine-therapies>





**THANK YOU  
FOR  
YOUR  
ATTENTION  
ANY QUESTION?**



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# Comparability and the management of manufacturing changes for cellular and gene therapy products

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Office of Therapeutic Products

FDA Center for Biologics Evaluation and Research

Nov 16, 2023

# 2023 Draft Guidance

## Manufacturing changes and comparability



### Manufacturing Changes and Comparability for Human Cellular and Gene Therapy Products

#### Draft Guidance for Industry

This guidance document is for comment purposes only.

Submit one set of either electronic or written comments on this draft guidance by the date provided in the *Federal Register* notice announcing the availability of the draft guidance. Submit electronic comments to <http://www.regulations.gov>. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. You should identify all comments with the docket number listed in the notice of availability that publishes in the *Federal Register*.

Additional copies of this guidance are available from the Office of Communication, Outreach and Development (OCOD), 10903 New Hampshire Ave., Bldg. 71, Rm. 3128, Silver Spring, MD 20993-0002, or by calling 1-800-835-4709 or 240-402-8010, or email [ocod@fda.hhs.gov](mailto:ocod@fda.hhs.gov), or from the Internet at <https://www.fda.gov/vaccines-blood-biologics/guidance-compliance-regulatory-information-biologics-guidance>.

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U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Biologics Evaluation and Research  
July 2023

## Provide advice for manufacturers of human cellular and gene therapy products regarding:

Managing manufacturing changes and reporting the changes to FDA

For both investigational and licensed products

Analytical comparability studies

Special considerations for cellular and gene therapies

Comparability study design and statistical approaches

*This draft guidance document is issued for comment purposes only*

*You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations*

# 2022 Draft Guidance

## Chimeric Antigen Receptor T cell products



### Considerations for the Development of Chimeric Antigen Receptor (CAR) T Cell Products

#### Draft Guidance for Industry

This guidance document is for comment purposes only.

Submit one set of either electronic or written comments on this draft guidance by the date provided in the *Federal Register* notice announcing the availability of the draft guidance. Submit electronic comments to <http://www.regulations.gov>. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. You should identify all comments with the docket number listed in the notice of availability that publishes in the *Federal Register*.

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For questions on the content of this guidance, contact OCOD at the phone numbers or email address listed above.

U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Biologics Evaluation and Research  
March 2022

## Provide advice for manufacturers of CAR T cell products regarding:

Manufacturing of vectors and CAR T cells

Including advice on change management and comparability

Manufacturing a CAR T cell product at multiple different facilities

Preclinical recommendations

Clinical recommendations

*This draft guidance document is issued for comment purposes only*

*You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations*

# Broad themes and highlights

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**Risk management**

**Planning for future changes**

**Phase-dependent expectations**

**Comparability studies**

**Obtaining advice and feedback from FDA**

# OUTLINE

**Managing manufacturing changes**

**Reporting manufacturing changes to an IND or BLA**

**Assessing comparability**

# MANAGING MANUFACTURING CHANGES

# Common reasons for manufacturing changes

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**Improving product quality**

**Improving efficiency or reducing costs**

**Adjusting to changes in the availability of materials**

**Expanding product supply**

Scale up

Scale out

New facility



# Risk management

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## **The risk of a significant manufacturing change can be high for cellular and gene therapies**

These are complex and novel products

Risk management relies on a clear understanding of critical aspects of the product and manufacturing process

## **Use a formal risk management strategy**

Will enable you to evaluate manufacturing changes effectively and efficiently

Will aid when deciding whether a comparability study is needed

And will guide how to design the comparability study

**We recommend *Q9(R1) Quality Risk Management* for advice on how to systematically manage risk**

# Manufacturing changes can pose risks to product quality

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## **It is critical that manufacturing changes do not adversely affect product quality**

Changes cannot compromise the safety or effectiveness of the product

## **Perform a risk assessment before making manufacturing changes**

Risk assessment plays a central role in quality risk management

## **If a change has a potential to adversely affect product quality, determine the impact of the change**

Perform comparability studies to evaluate any adverse effects of the change on product quality

# Phase-dependent considerations when making manufacturing changes

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## **The extent of comparability data needed is highly dependent on:**

- The stage of clinical development

- The severity and likelihood that the change might adversely affect product quality

## **Comparability studies and statistical approaches should typically be more rigorous later in the product lifecycle**

- Changes in the middle of a pivotal study

- Changes right before a BLA submission

- Changes post-licensure

## **Best practices**

- Develop a thorough understanding of the product's quality attributes and how the manufacturing steps affect these attributes

- When possible, implement any extensive changes before initiating pivotal studies

# Challenges in managing manufacturing changes for cellular and gene therapy products

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## **Challenges when assessing risks**

Limited characterization of the product and the manufacturing process

Uncertain mechanisms of action and difficulty measuring potency

## **Challenges for comparability studies**

Variable cellular source material

Limited cellular source material

Limited number of lots

Small lot size or limited sample volume

Changes in assays

# Planning ahead for changes

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## **Plan ahead to reduce risks and disruptions from future manufacturing changes**

Develop a scalable process

Retain sufficient samples of all lots

Manufacture a sufficient number of lots to support future comparability studies

Understand how changes to assays might affect your ability to evaluate comparability

# REPORTING MANUFACTURING CHANGES TO AN IND OR BLA

# Reporting manufacturing changes to INDs

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## **Submit manufacturing changes that may affect product quality**

Update CMC information using IND amendments

Submit CMC information well in advance of implementing the change

To allow sufficient time for FDA review and feedback

Also summarize any significant manufacturing changes in your IND's annual report

## **An IND may be placed on clinical hold if:**

You make a manufacturing change with a potential adverse impact on safety or effectiveness, but you do not adequately evaluate the impact of the change

# Some changes may yield a different product

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## **Some changes fundamentally alter the design or nature of a product**

A fundamentally new product should be submitted in a new IND

These types of changes are not amenable to comparability studies

Please ask us if you are unsure

### **Examples:**

For a T cell therapy:

Change from CD4+ T cells to a mixture of CD4+ and CD8+ T cells

For a gene therapy vector:

Change to the vector capsid that alters vector tropism

For a genome editing product:

Different target gene



# Reporting manufacturing changes to BLAs

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**Assess the potential impact of all manufacturing changes**

**Report the change in a supplement:**

For manufacturing changes that have a substantial or moderate potential to have an adverse effect on product quality

**Annual report:**

For manufacturing changes that have a minimal potential to have an adverse effect on product quality

**Include data to evaluate the effect of the change on product quality**

**An approved comparability protocol may ease implementation of a change**

Submit your comparability protocol in a supplement, and we will review

# ASSESSING COMPARABILITY

# Obtaining advice on comparability studies

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## **Involve a statistician when you design a comparability study**

### **Obtaining feedback from FDA**

Prospectively discuss significant manufacturing changes

Provide a detailed comparability protocol

If a change needs to be made but the product is not comparable, discuss proposed clinical studies with the post-change product

Mechanisms for obtaining feedback:

- Formal meeting request

- IND amendment

- BLA product correspondence

# Comparability studies, protocols and reports

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**Before conducting a comparability study, prospectively write a comparability protocol:**

Describe the manufacturing change

Assess the risk of the change

Describe the study design in detail, including which lots will be used

List test methods and acceptance criteria

Describe how the data will be analyzed

**Submit the comparability report to your IND or BLA**

# Goals of an analytical comparability study

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## **Ensure that the safety and effectiveness of the product will not be compromised by the manufacturing change**

It is not necessary for product quality to be identical after a manufacturing change

Demonstrate that the change has no adverse effect on the safety or effectiveness of the product

## **Evaluate all attributes of the product that might be adversely affected by the change**

Changes to the manufacturing process can have higher risk than routine manufacturing

Lot release assays may not always be sufficient to evaluate comparability

Additional product characterization is often appropriate

# CAR T cell products

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## Changes to vector manufacturing

Compare quality attributes of the pre- and post-change vector

Compare quality attributes of CAR T cells manufactured with the pre- and post-change vector, using the same cellular starting material

## Manufacturing at multiple facilities

If the same product is made at more than one facility, it is important that these products are comparable

It is also important that assays give reproducible results even if performed at different sites

## Changes to CAR T cell manufacturing

Some CAR T cell attributes are strongly linked to the cellular starting material

Variation among donors → variation among CAR T cell lots

We recommend split-source studies, to decrease the impact of this variability

Use the same cellular starting material in both the old and new manufacturing process

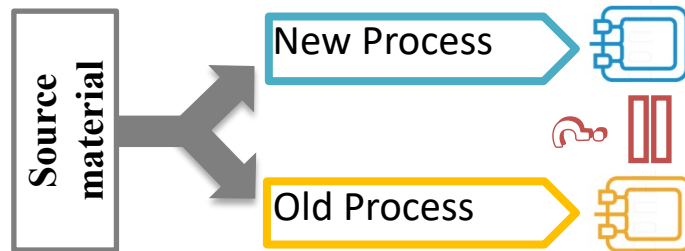
# Products derived from a variable cellular starting material

## Donor-derived cells are highly variable

This results in variable product attributes, which can make it difficult to evaluate how manufacturing changes affect product quality

## Split-source material study design and paired statistical analysis may help

This study design can minimize the effect of source material variability



## When manufacturing product for comparability studies:

Best to use the same type of source material as the clinical product

But may be able to use other material if justified  
(for example, cells from healthy donors)

# The comparability report

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## **Introduction**

Description of the manufacturing changes

Rationale and justification for the changes

Justification of the comparability study design

Timeline for implementing the changes

## **Risk Assessment**

Determine quality attributes that are at risk from the change

Select product attributes and process parameters to be evaluated



# The comparability report

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## Comparability Study Design

List the lots included in the study, and sources of historical product data

Describe the test methods

List the acceptance criteria for comparability of each attribute

These should be based on understanding the relationship of the attribute to safety or effectiveness

Refer to the draft guidance for some advice on specific situations

## Results and conclusions

Include data in tabular format, along with summary statistics

Describe the conclusions from the study

Explain any changes or deviations from the comparability protocol

# Reaching a conclusion about comparability

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## **A comparability study should reach a definitive conclusion**

Is the post-change product comparable to the pre-change product?

## **Failing to detect differences is *not* the same as demonstrating equivalent product quality**

Some comparability studies are inconclusive because of:

- Lack of statistical power

- Imprecise assays

- Poor understanding of a product's quality attributes

- Lack of assays to measure a product attribute that may be affected by the change

A two-sample *t*-test is usually not an appropriate method

## **If a product is not analytically comparable after a change (or if the comparability study is inconclusive), then:**

Nonclinical or clinical studies may be needed to demonstrate the safety and/or effectiveness of the post-change product

# Statistical considerations

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**Lots for the study should be representative and selected in an unbiased manner**

**Describe the statistical methods**

**Justify the assumptions of the statistical approach**

For example, many parametric tests assume that data are normally distributed

**Different statistical methods may be used to analyze different attributes**

**Studies should have adequate power to show that the change has no biologically-relevant adverse effects on product quality**

Use an adequate number of lots

Assays need sufficient precision to detect biologically-meaningful differences

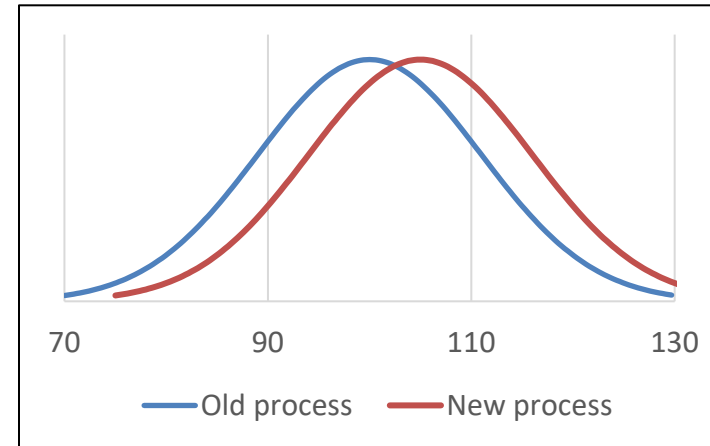
# Two fundamentally different statistical approaches to evaluating comparability

## Equivalence

Evaluate whether two populations are similar enough

Set acceptance criteria for the confidence interval of the difference in means

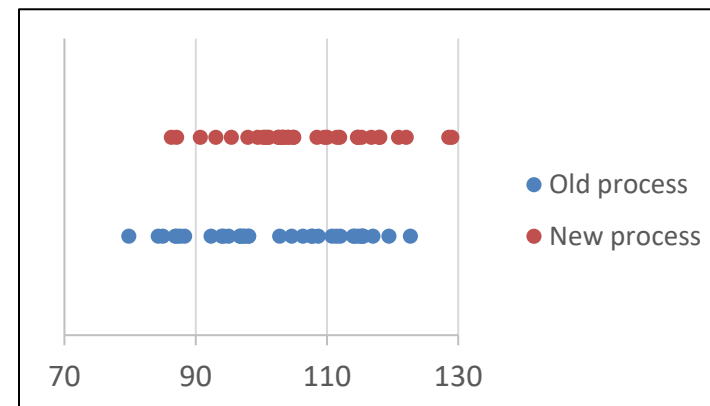
A rigorous approach, suitable for high-risk attributes



## Quality range

Evaluate whether individual lots fall within an acceptable range

Post-change values should not fall outside a certain range



# Conclusions

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**Risk management should play a central role in managing manufacturing changes and designing comparability studies**

**Plan ahead for future changes**

**FDA can provide advice through your IND or BLA**

# Contact Information

- Anurag Sharma, PhD

[Anurag.Sharma@fda.hhs.gov](mailto:Anurag.Sharma@fda.hhs.gov)

- Regulatory Questions:

OTP Main Line – 240 402 8190

Email: [OTPRPMS@fda.hhs.gov](mailto:OTPRPMS@fda.hhs.gov)



- OTP (OTAT) Learn Webinar Series:

<http://www.fda.gov/BiologicsBloodVaccines/NewsEvents/ucm232821.htm>

- CBER website: [www.fda.gov/BiologicsBloodVaccines/default.htm](http://www.fda.gov/BiologicsBloodVaccines/default.htm)

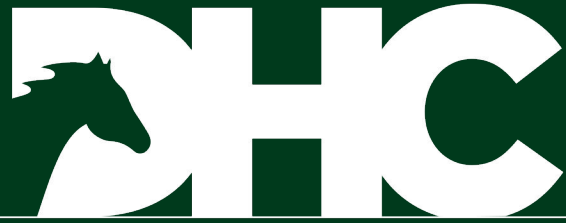
- Phone: 1-800-835-4709 or 240-402-8010

- Consumer Affairs Branch: [ocod@fda.hhs.gov](mailto:ocod@fda.hhs.gov)

- Manufacturers Assistance and Technical Training Branch: [industry.biologics@fda.gov](mailto:industry.biologics@fda.gov)

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DARK HORSE CONSULTING

# Opportunities for Standardization in Comparability of Cell and Gene Therapies

Workshop for the Identification and Standardization of Methods for Assessing Gene  
Therapy Product Activity and Comparability and the Evaluation of T-Cell Therapies

Tal Salz, PhD | Practice Expert  
tsalz@darkhorseconsultinggroup.com  
Dark Horse Consulting Group

# What is a standard?

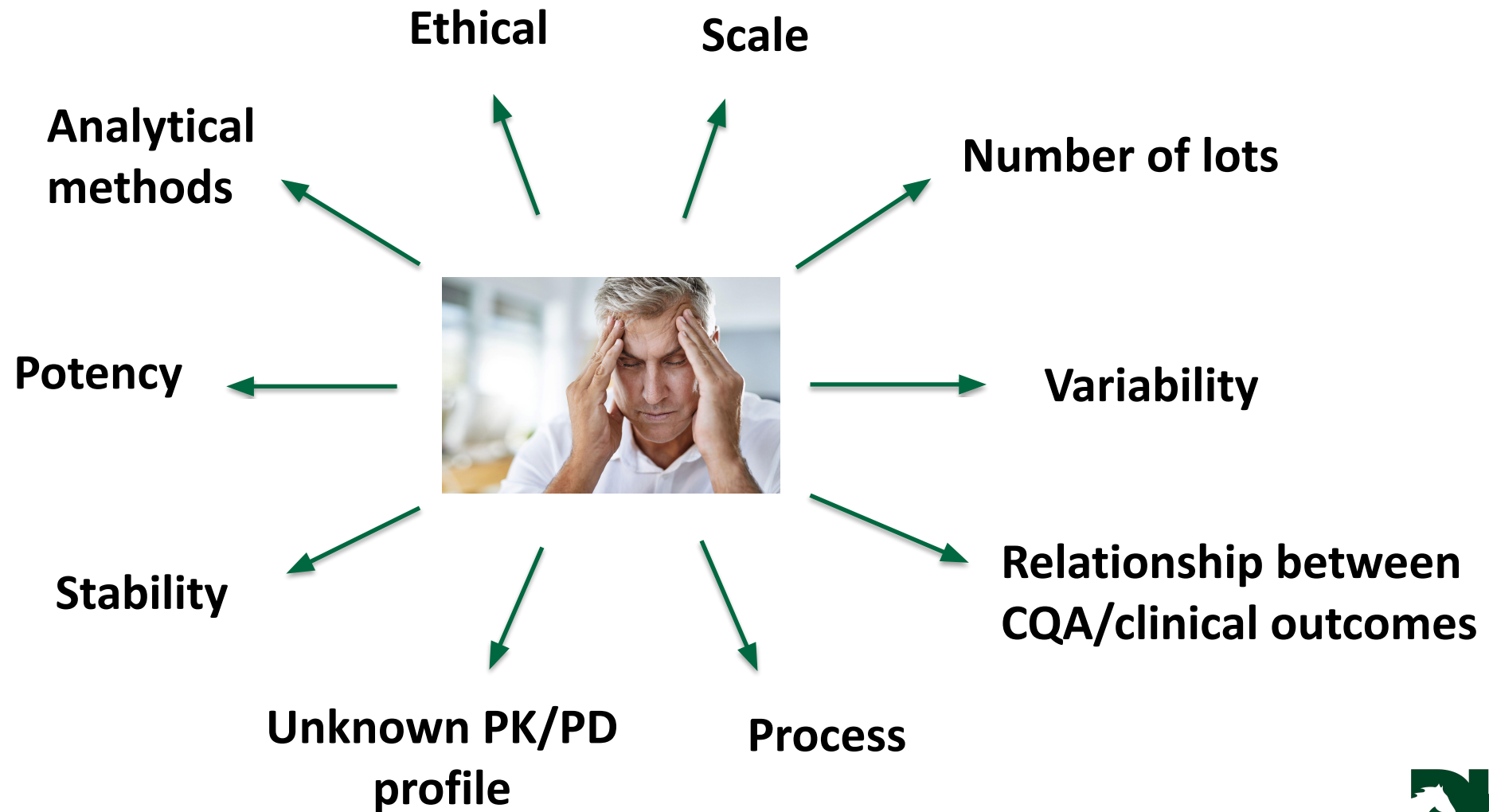
***“The term “standard” (or “technical standard”) includes all of the following:***

- (1) common and repeated use of rules, conditions, guidelines or characteristics for products or related processes and production methods, and related management systems practices;*
- (2) the definition of terms; classification of components; delineation of procedures; specification of dimensions, materials, performance, designs, or operations; measurement of quality and quantity in describing materials, processes, products, systems, services, or practices; test methods and sampling procedures; formats for information and communication exchange; or descriptions of fit and measurements of size or strength; and*
- (3) terminology, symbols, packaging, marking or labeling requirements as they apply to a product, process, or production method.”*

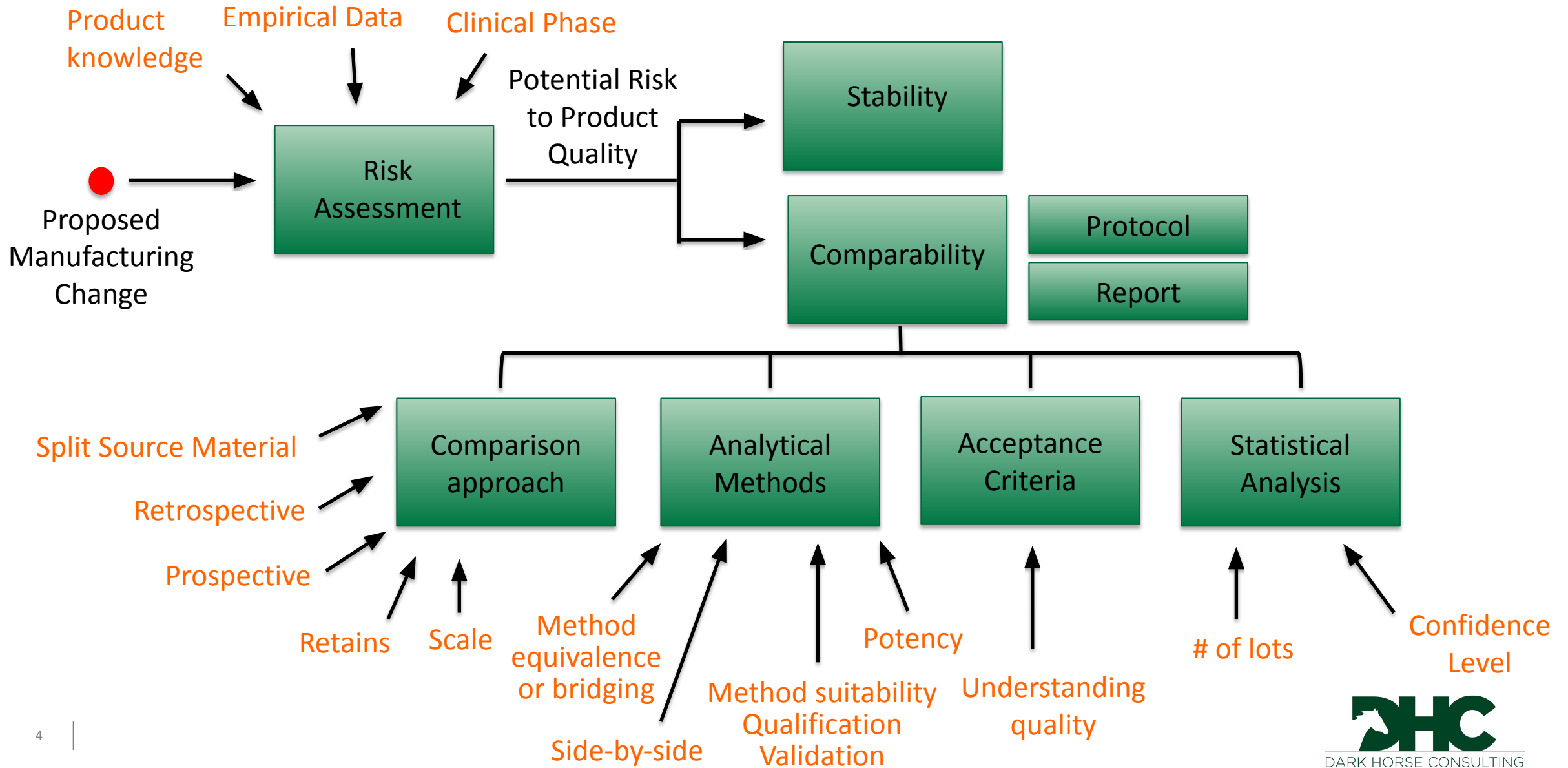
*FDA Guidance for Industry: Standards Development and the Use of Standards in Regulatory Submissions Reviewed in the Center for Biologics Evaluation and Research (March 2019)*



# CGT Comparability is Complex



# Considerations in Comparability



# The Questions We need to Ask Ourselves

- Is comparability standardization desired by industry and stakeholders?
- Is comparability standardization desired by FDA?
- Can we find common ground and opportunities for comparability standardization
- Will comparability standardization effectively reduce burden for industry, stakeholders and FDA?

# Can We Standardize Comparability?

- Demonstrating comparability is a complex exercise, particularly in the cell and gene therapy space and there is no one size fit all approach.
- However, there could be an opportunity for standardizing some elements associated with comparability evaluation:
  - Risk Assessment
  - Study Procedures (e.g., split-source material)
  - Method equivalence
  - Side-by-side testing
  - Statistical approaches
  - Qualification of Scale-down model
  - Qualification of retains
  - Study report/study protocol
  - Terminology

# Risk Assessment

- Risk analysis is the estimation of the potential risk posed to product quality by a manufacturing change.
- ICH Q9(R1): “achieving a shared understanding of the application of risk management among diverse stakeholders is difficult because each stakeholder might perceive different potential harms, place a different probability on each harm occurring and attribute different severities to each harm”
- It is important that subjectivity inherent in performing a risk assessment is managed and minimized

# Can Manufacturing Change Risk Assessment Be Standardized?

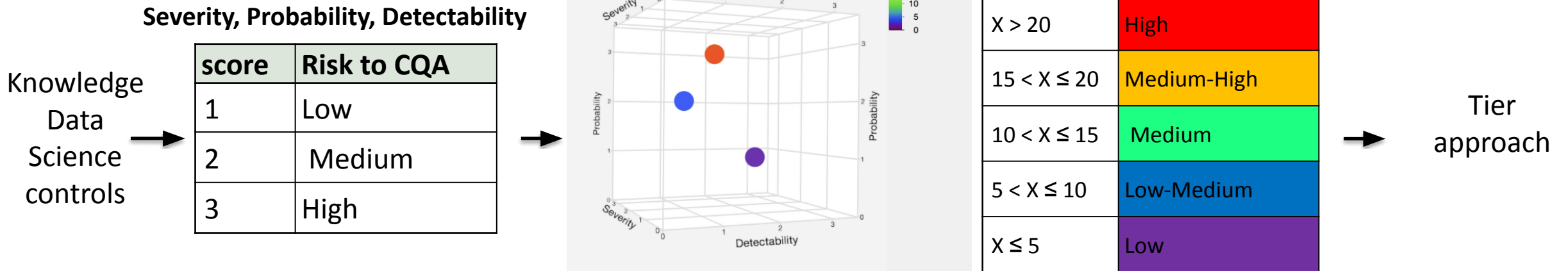
- The output of a risk assessment is either a quantitative estimate of risk or a qualitative description of a range of risk.
- Risk can be expressed using qualitative descriptors, such as “high”, “medium”, or “low”, which should be defined in as much detail as possible.
- Risk can be expressed as a "risk score" to further define descriptors in risk ranking.

Evaluated elements:

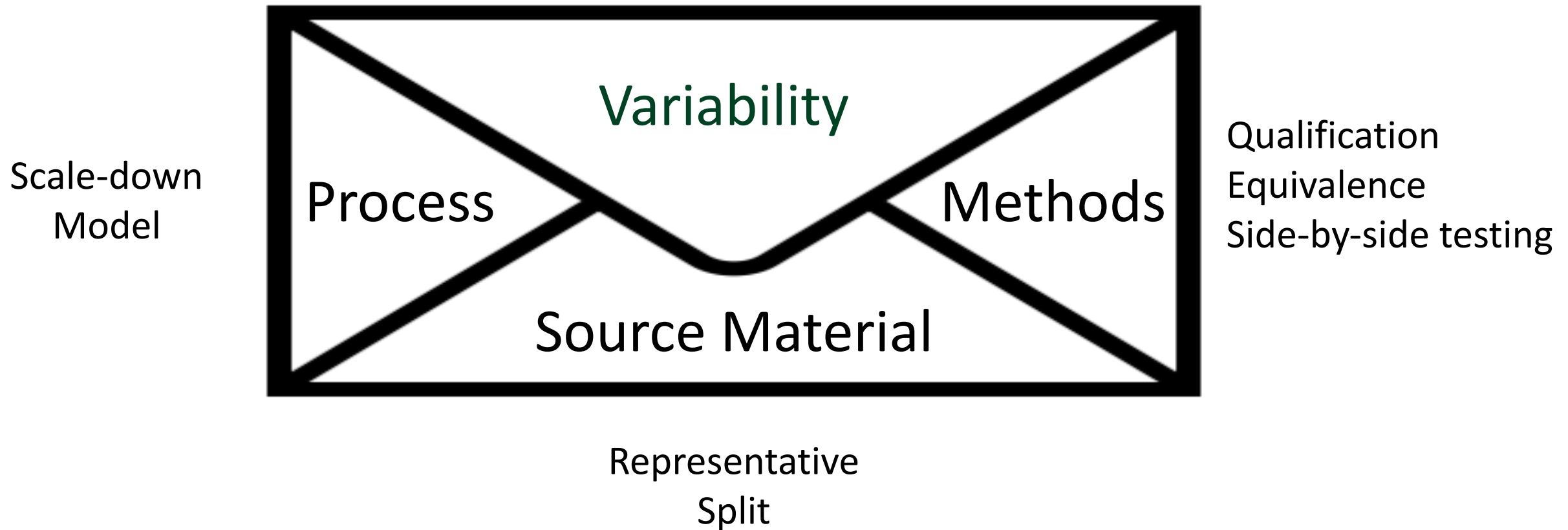
<b>Severity (S)</b>	If a failure were to occur, what effect would that failure have on the product quality and on the patient (if any)?
<b>Probability (P)</b>	How likely is it for a particular failure to occur (probability of occurrence)
<b>Detectability (D)</b>	What mechanisms are in place (if any) to detect a failure if it were to occur?

# Risk Priority Number (RPN)

- $RPN = S \times P \times D$
- The higher the RPN, the greater the risk



# Variability is a Confounding Challenge for Comparability





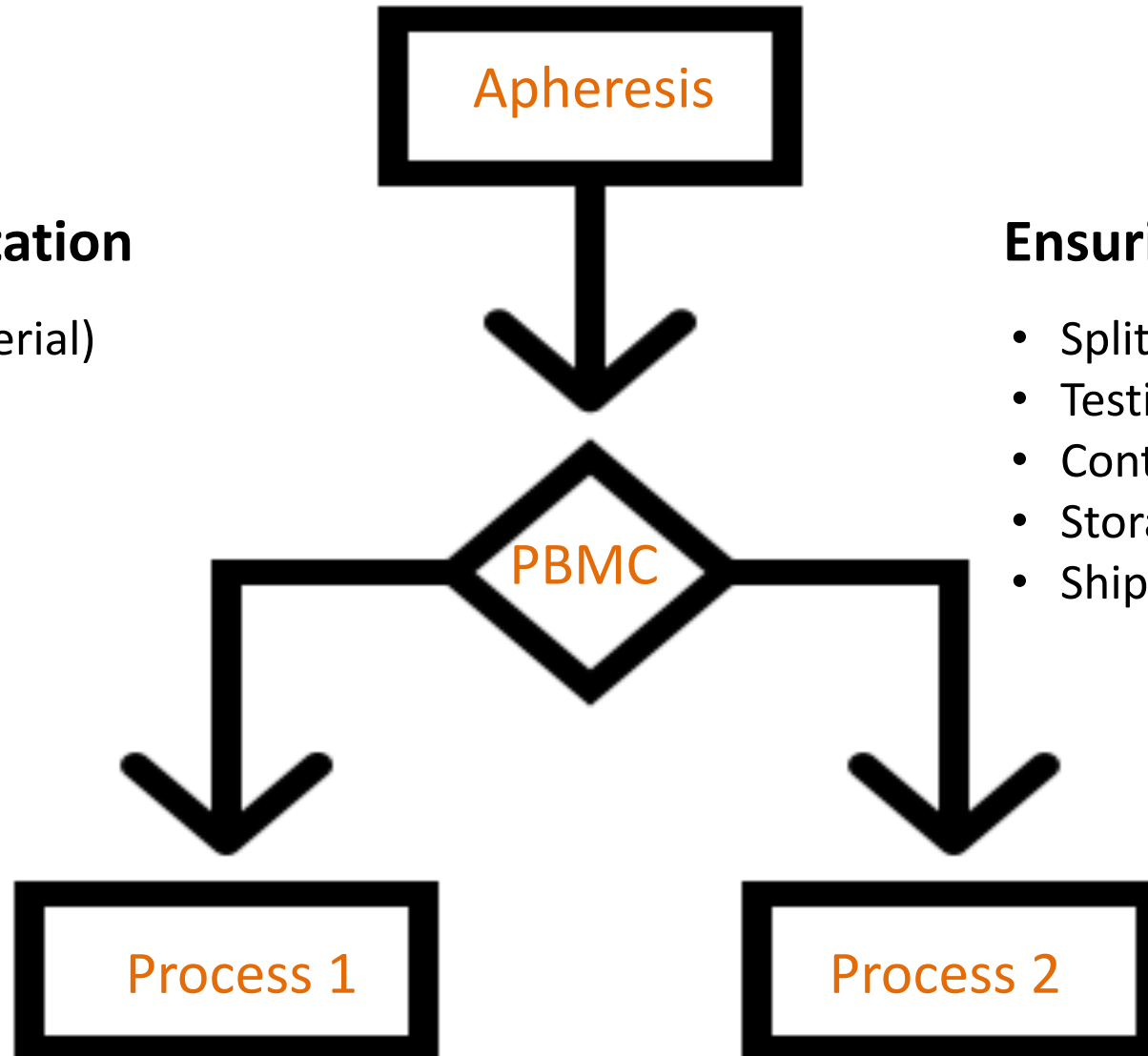
# Split Source Material Comparability Approach

## Ensuring representation

- Donor (starting material)
- Processing
- Scale
- Stability

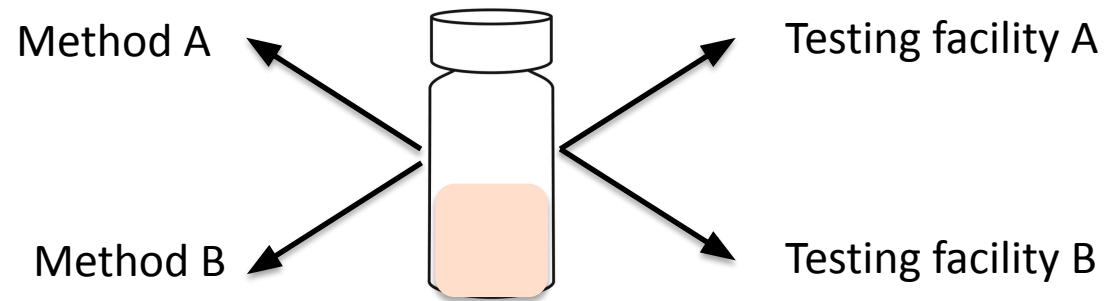
## Ensuring comparable portions:

- Split procedures
- Testing
- Container
- Storage/hold conditions
- Shipping



# Method Equivalence

- Methods and testing facilities change overtime
- Method equivalence is a working assumption in comparing the pre- and post-change test results when they were generated in different testing facilities or with different methods.
- Method equivalence is typically demonstrated through split sample(s) study
  - How to determine the number of samples?
  - Should samples with known range of results be included?
  - What is an acceptable %CV?
  - Sample stability
  - Number of operators

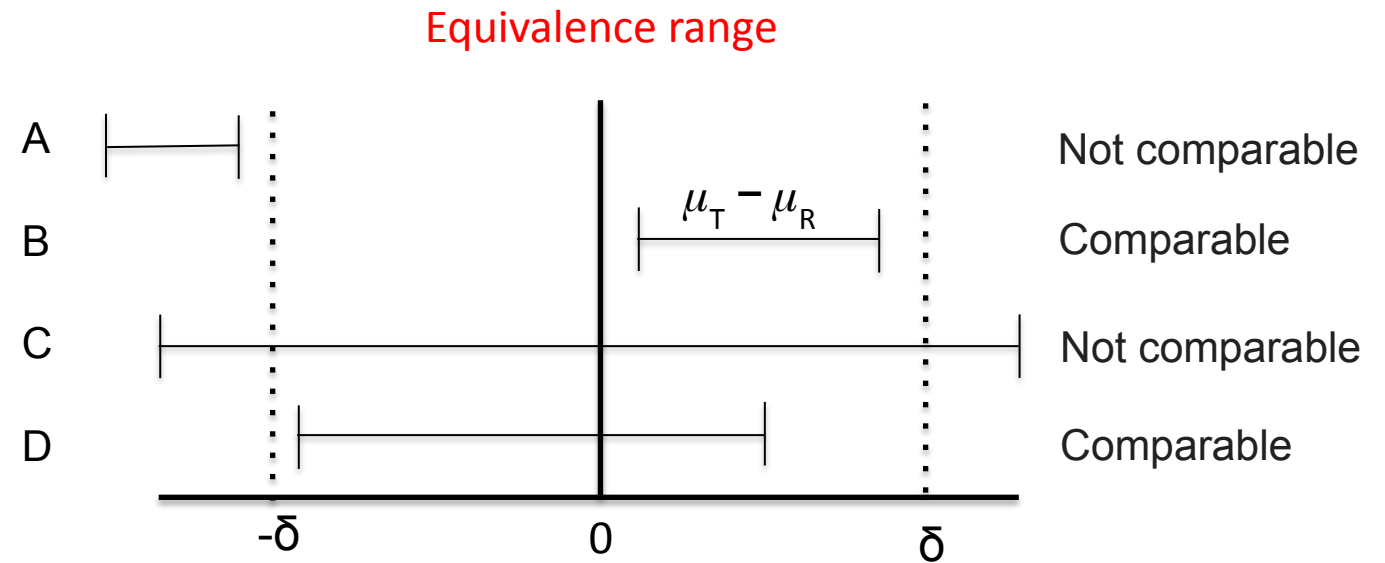


# Side-by-side Testing

- Method variability can impact the results of comparability
- To reduce method variability, the pre- and post-change product samples could be tested side-by-side
- Side-by-side testing is defined differently by different people and includes the following considerations:
  - Same testing facility?
  - Same reagent lots?
  - Timing (you can get better at performing a method over time; trending)?
  - Simultaneous processing?
  - Same run?
  - Same instrument?
  - Same operator?

# Statistical Methods

- Two-One-Sided Tests procedure (TOST) is a statistical method for comparability which has gained popularity in recent years
- Equivalence range is the largest acceptable difference between the pre-change and post-change attribute
- Working assumptions and statistics could be standardized
- The equivalence range should be determined on a case-by-case basis



$$H_0: \mu_T - \mu_R \leq -\delta \text{ or } \mu_T - \mu_R \geq \delta$$
$$H_1: -\delta < \mu_T - \mu_R < \delta$$

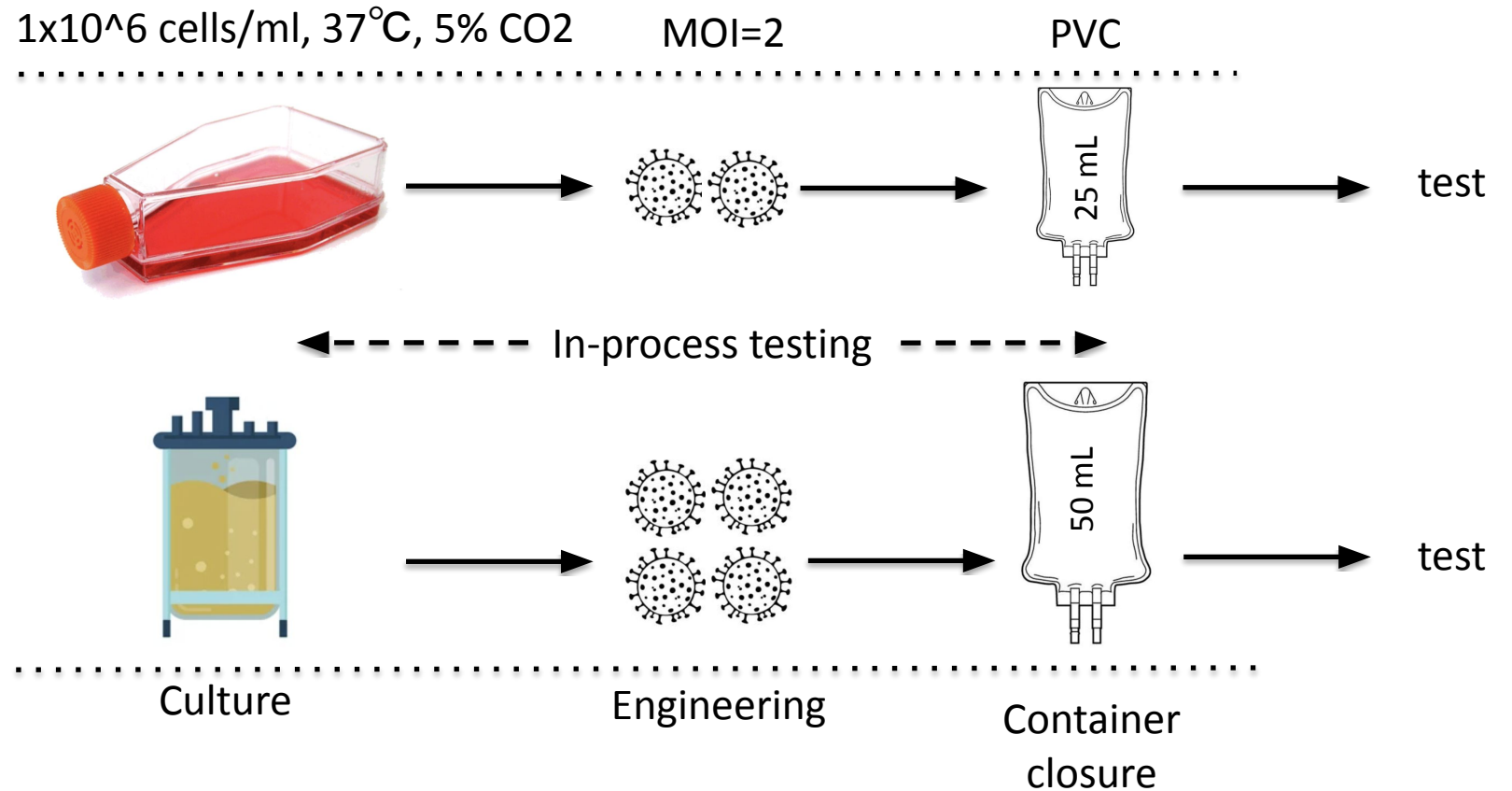
# Qualification of a Scale-down Model

- CGT processes are costly
- Manufacturing lots strictly designated for comparability at the CDMO is often not possible
- Scale-Down process models can be used for demonstrating CGT comparability
- The Scale-Down process should be shown to be representative of the full-scale process and generate a product with similar quality
- What parameters should be kept constant?
- What attributes should be evaluated?
- What acceptance criteria should be satisfied?

# Qualification of a Scale-down Model

• Is there an opportunity to define standards for qualifying a Scale-Down model?

- Proportion
- Unit operations
- Materials used
- In-process sampling
- Comparability?



# Retains

- Retains are often used to test pre-change lots
- The storage and age of retain samples can impact their quality
- How do we ensure that the retain sample used is representative of the pre-change product?
  - Stability
  - Storage conditions
  - Control test



# Study report/protocol

- Comparability protocol and comparability report submissions are notably different and often are missing important information
- Standardization of the structure and/or information that should be included in a comparability protocol/report will streamline submissions and facilitate FDA review

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<b>Conclusions</b> .....	<b>2</b>



# Terminology

- Analytical Comparability
- Side-by-side testing
- Prospective analysis
- Retrospective analysis
- Method equivalence
- Method bridging
- Split source material (same donor? Same apheresis collection? Same PBMCs?)
- Equivalence Range
- Quality Range

# Summary Thoughts

- Comparability comes in many shapes and forms
- However, there are opportunities for standardizing elements relevant to comparability of CGTs which could benefit both FDA and industry
- However, the most difficult task of establishing comparability acceptance criteria is unique to the product
- Limited number of lots available for comparability analysis remain a significant challenge which could be salvaged using a scale-down model.

Thank you!

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# Evolving Standards and Tools to Meet Industry Needs in Cell and Gene Therapy

Diane McCarthy  
November 16, 2023



→ **Value of Standards for Cell and Gene Therapy**

---

→ **Raw and Starting Materials**

---

→ **Product Quality Attributes**

---

→ **Impurities**

# Partnerships through our Shared Challenges



## Partnering with our expert volunteers

USP's public quality standards, developed by volunteer experts, including government liaisons, enable transparent processes that ensure quality methods, APIs, and education



## Partnering with regulators, including the FDA

Regulators must be able to ensure pharmaceuticals are approved for market regardless of technology used. They depend on a quality-assured scientific basis for decision-making in regulatory review, manufacturing practices, and enforcement

# Access to quality medicines

## Partnering with industry

Manufacturers must be able to bring quality pharmaceuticals to market and depend on quality-assured methods, materials, and resources to reduce risk to market entry



## Partnering with strategic collaborators

Strategic collaborations are critical for identifying and pursuing key growth objectives, deepening and broadening quality systems, and enabling the overall medicine value chain, end to end

# Need for Standards and Best Practices



- “The use of standards can **facilitate product development** and **reduce the amount of documentation** needed in a regulatory submission, thus contributing to a more efficient submission evaluation and, ultimately, **improving time to market.**”
  - FDA 2019 Guidance for Industry: Standards Development and the Use of Standards in Regulatory Submissions Reviewed in the Center for Biologics Evaluation and Research
- Validated **compendial assays** reduce the burden of method development and technology transfer
- **Reference materials** benchmark measurements and validation criteria across batches, manufacturing sites, and product developers
- Phase-appropriate **best practices** balance risk and benefit



# Supporting Quality and Consistency of Emerging Modalities

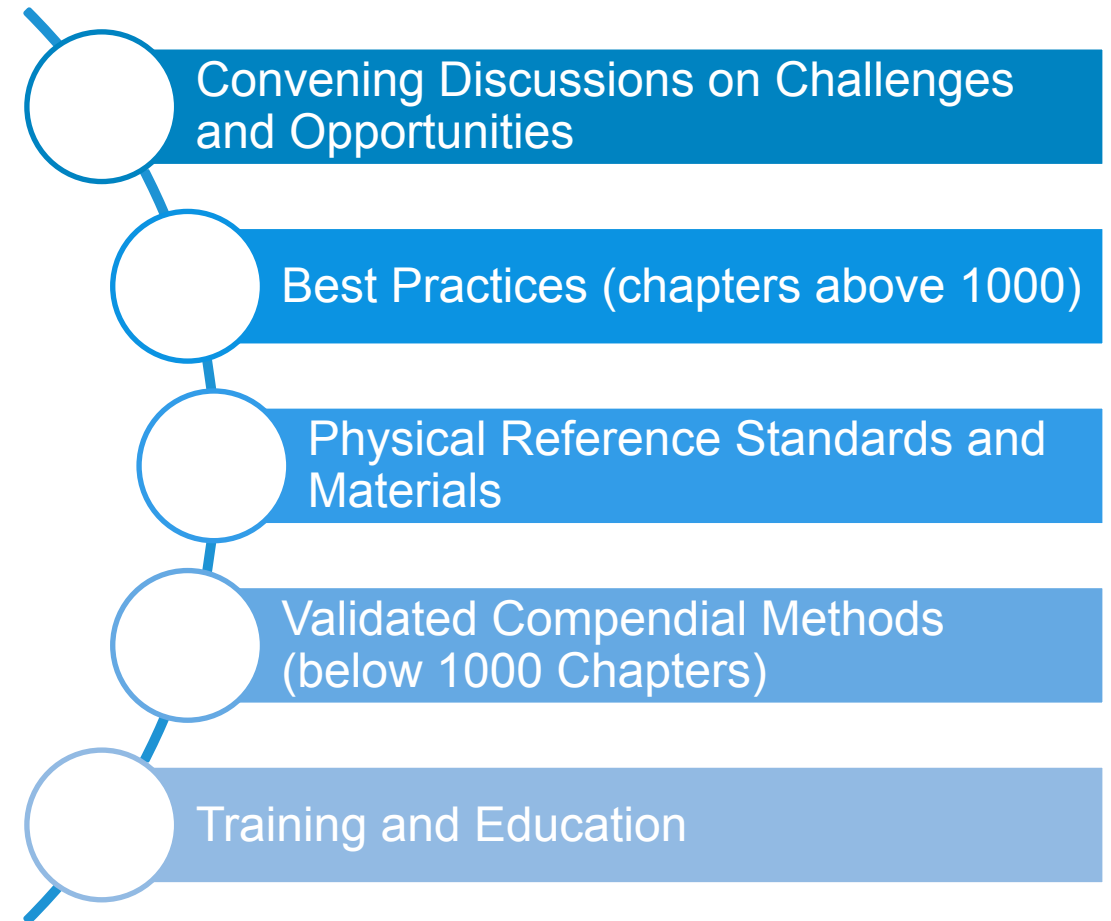


## □ Benefits of Standards include:

- **Consistency** Help facilitate consistent and predictable manufacturing processes, product testing throughout lifecycle
- **Innovation** Foster innovation and adoption of new technologies, lower R&D costs by building on existing standards
- **Supports** meeting regulatory expectations, and facilitate market entry for safe and effective products, including products from emerging technologies

## □ Remains challenging to defining a standard that suits every developer's needs

- Diverse range of product types
- Unique requirements for raw materials
- Lack of alignment on PQAs and test methods





1

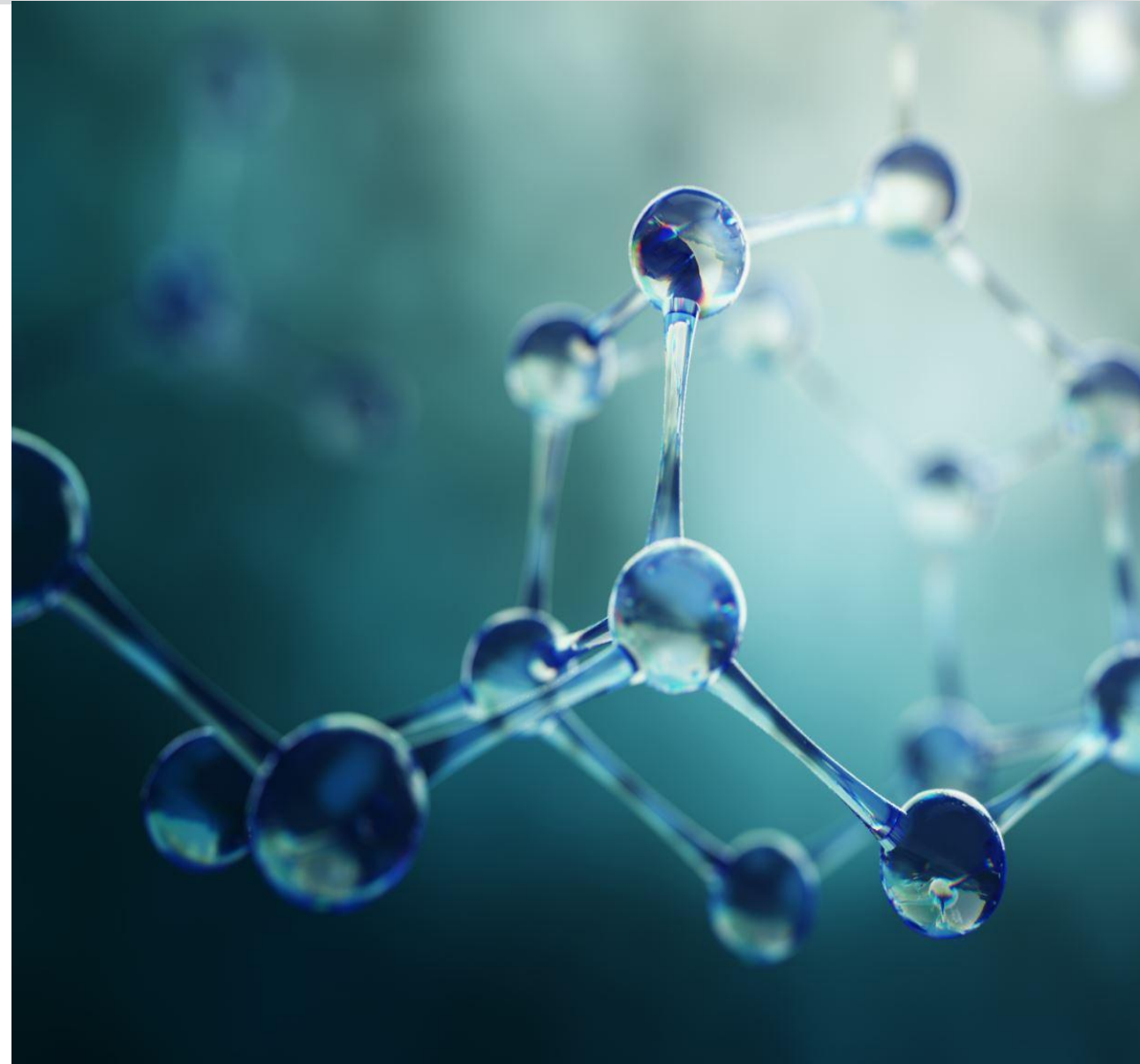
# Raw and Starting Materials

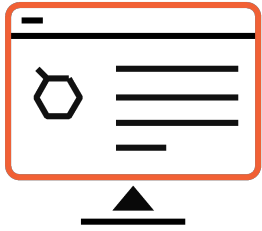
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# Challenges in Ensuring Quality of Raw Materials



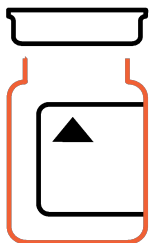
- Some products are not amenable to extensive purification, filtration, or terminal sterilization
- Compendial testing may not be possible
  - No appropriate compendial methods
  - Limited or expensive material
  - Short shelf-life
- Raw material produced using GMP principles may not be available
- Vendor testing insufficient to assure raw material functionality
- Lot-to-lot variability in material quality and function





## Documentary standards—General chapters

- ❑ *<1044> Cryopreservation of Cells*
- ❑ *<1043> Ancillary Materials for Cell, Gene, and Tissue Engineered Products*
- ❑ *<1042> Cell Banking Practices for Recombinant Biologics **NEW***
- ❑ *<1027> Flow Cytometry*
- ❑ *<1024> Bovine Serum*
- ❑ *<1040> Quality Considerations of Plasmid DNA as a Starting Material for Cell and Gene Therapies  
*published in PF 49(6)**
- ❑ *<90> Fetal Bovine Serum--Quality Attributes and Functionality Tests*
- ❑ *<89> Enzymes Used as Ancillary Materials in Pharmaceutical Manufacturing*
- ❑ *<92> Growth Factors and Cytokines Used in Cell Therapy Manufacturing*
- ❑ *<127> Flow Cytometric Enumeration of CD34+ Cells*



## Reference Standards

- ❑ CD34+ Enumeration System Suitability (freeze-dried cells)
- ❑ Fetal Bovine Serum
- ❑ Albumin (recombinant and bovine)
- ❑ Trypsin
- ❑ Collagenase I and II

# Development of Chapter on Best Practices for Plasmid DNA



- Stakeholder feedback indicated there was insufficient regulatory guidance for plasmid DNA used in the manufacturing of cell and gene therapy
- USP has recognized this gap and initiated efforts to define plasmid DNA best practices
  - USP Expert Panel for plasmid DNA was established to provide guidance
    - Recruited expert volunteers through an open Call for Candidates
  - General Chapter was published in Pharmacopeial Forum on Nov 1, 2023
    - Open for public comments until Jan 31, 2024
    - <https://www.uspnf.com/pharmacopeial-forum>

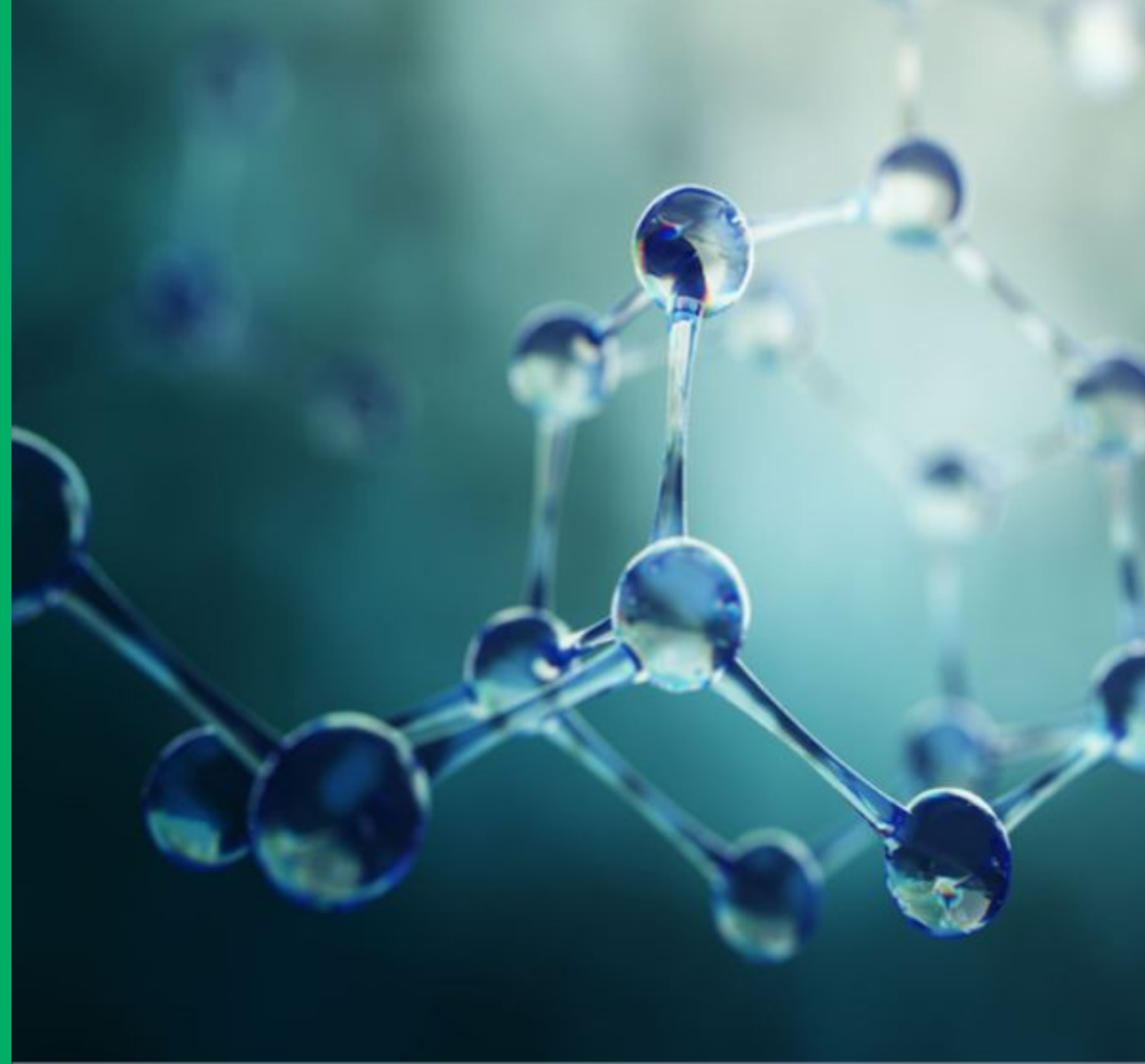
## CHAPTER OUTLINE

- Manufacturing Considerations
  - Master Cell Bank
  - Facility Design
- Quality Management
  - Phase Appropriate Quality Systems and Facilities
- DNA Starting Material Quality
  - Quality Attributes
  - Stability Testing
  - Performance Testing
  - Plasmid to Plasmid Cross-Contamination
  - Receipt Testing
  - General Acceptance Criteria and Manufacturing Considerations

# Standards and Tools in Development



- General Chapters (<1000) with validated methods and associated Reference Standards for
  - Enzymes used in CGT processing
  - Cytokines and growth factors used in cell culture
  
- Reference Materials:
  - Plasmid DNA for quality assessment of ancillary materials



2

## Product Quality Attributes

---

## <1046> Cell-based Advanced Therapies and Tissue-Based Products

- Qualification of source cells/tissues
- Manufacturing process considerations
- Final product release testing
- General considerations of CQAs for potency, purity, identity, stability, sterility, packaging and administration
- Fundamental steps for tech transfer

## <1047> Gene Therapy Products (under revision)

- Addresses both commercial and clinical trial materials
- Manufacturing and process development considerations
- Vector design, manufacturing and purification
- Analytical tests for CG products

# Challenges of AAV Gene Therapies Manufacturing

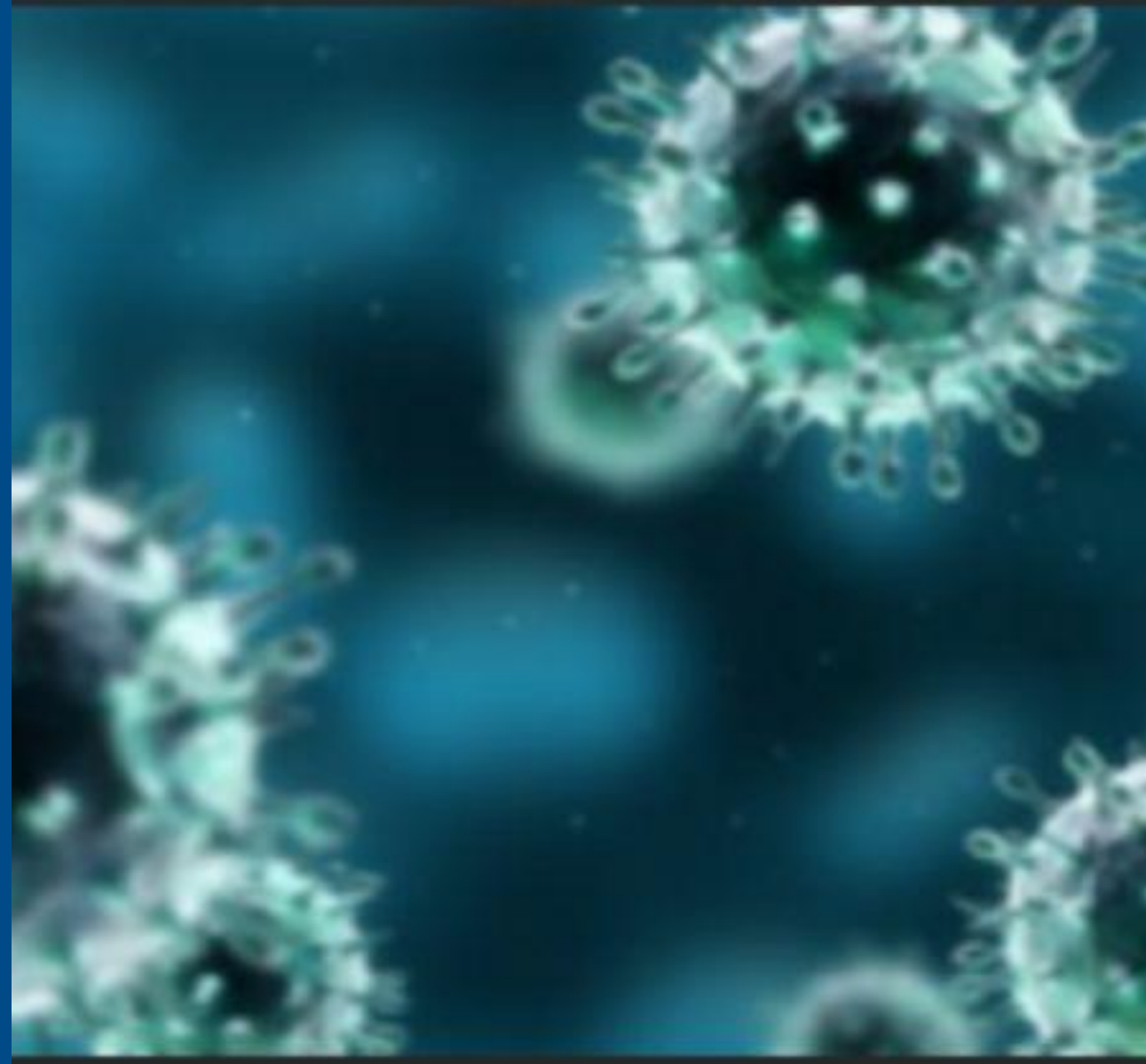


## □ Challenges

- Manufacturing viral vectors requires several discrete manufacturing activities, each with requirements for production, purification, release and stability testing
- A variety of analytical methodologies are in use for assessing PQAs and there is limited harmonization or use of common standards used across products/developers

## □ Solutions

- Convened industry experts through USP sponsored roundtables and events to identify challenges and potential solutions
- Build alignment on key considerations and best practices
- Identify opportunities for standards to alleviate bottlenecks and improve efficiency of development





# Aligning on Best Practices for AAV Products



- Stakeholders expressed need for harmonization of CGT methods
  - Feedback from Expert Committee, industry stakeholders, and USP roundtable in December 2021
- USP established an AAV Gene Therapy Expert Panel
- Panel initiated work in June 2022

## CHAPTER OUTLINE *(as of Nov 2023)*

- **Vector Characteristics & Design**
  - Safety, transgene cassette, capsid
- **Materials**
  - Raw and critical starting materials
- **Manufacturing**
  - Drug Substance (Seed train to purification)
  - Drug Product
- **Formulation & Final Presentation**
- **Control Strategy**
  - Microbial and viral testing
  - Reference Standards, Assay Controls, In-Process Controls
  - Drug Substance/Drug Product Quality
- **Stability**
  - Starting Materials, DS, DP, Stability studies
- **Comparability**
  - Phase Appropriate Comparability Strategies

# Full-to-empty AAV Vector Characterization



- November 2019 NIIMBL Technology Workshop identified an interlaboratory study on measuring the **ratio of full-to-empty viral capsids as a high impact activity**
- USP, NIST and NIIMBL collaborated on a study to assess and harmonize (where applicable) analytical methods for **analysis of full-to-empty ratio**
  - Interlaboratory studies to measure full-to-empty ratio of AAV
    - AAV serotype 5 and 8 were evaluated with different full to empty ratio
    - 7 organizations participated to the study
  - Analyze and share data to help standardize methods
    - Manuscript in preparation

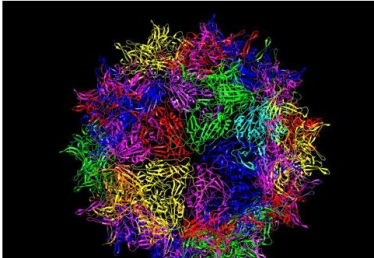
**NEWS**

## New Collaboration Aims to Improve Measurement of Viral Vectors Used in Cutting-Edge Gene Therapies

A large interlaboratory study of adeno-associated virus (AAV), an important tool in gene therapy, will be led by USP and NIST in collaboration with NIIMBL.

July 27, 2021

ROCKVILLE, Md. — The U.S. Department of Commerce's National Institute of Standards and Technology (NIST), the National Institute for Innovation in Manufacturing Biopharmaceuticals (NIIMBL) and United States Pharmacopeia (USP) have announced a research collaboration to assess analytical methods and develop standards for adeno-associated virus (AAV), an important mechanism for delivering gene therapies.

A 3D molecular model of an AAV capsid, showing a complex, multi-colored structure with various colors representing different parts of the protein shell.

**MEDIA CONTACT**  
Rich Press  
richard.press@nist.gov  
(301) 975-0501

**ORGANIZATIONS**  
Material Measurement Laboratory  
Biomolecular Measurement Division  
Bioprocess Measurements Group  
Office of Advanced Manufacturing

# Physical Reference Materials in Development



- Vector genome titer for AAV
- Vector genome titer for LVV
- LVV integration copy number
- AAV Capsids
  - Empty: full ratio
  - Capsid protein analysis
  - Aggregation



3

## Impurities

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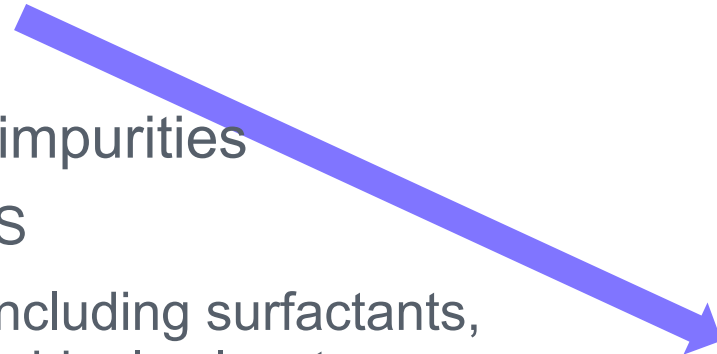
# Process Related Impurities



*Impurities are process-specific, not an exhaustive list!*

## □ Cell substrate-derived process impurities

- Residual DNA (host cell DNA)
- Host Cell Proteins



## □ Cell culture derived impurities

- Growth factors, FBS
- Process additives including surfactants, antifoam agents, residual solvents

## □ Residual Raw/ Starting Materials

- Plasmids
- Transfection reagents

- Quantities in final product need to be controlled and monitored
- WHO and FDA guidelines recommend a limit of 10 ng/dose residual DNA in a final product dose
- Physical Materials needed to support quantitation

- Residual HCPs can impact product quality, safety, and efficacy
- HCP levels should be measured in preclinical toxicology lots, clinical development and process validation
- Due to complex assay development, best practices can improve consistency

# New Reference Materials for Residual DNA

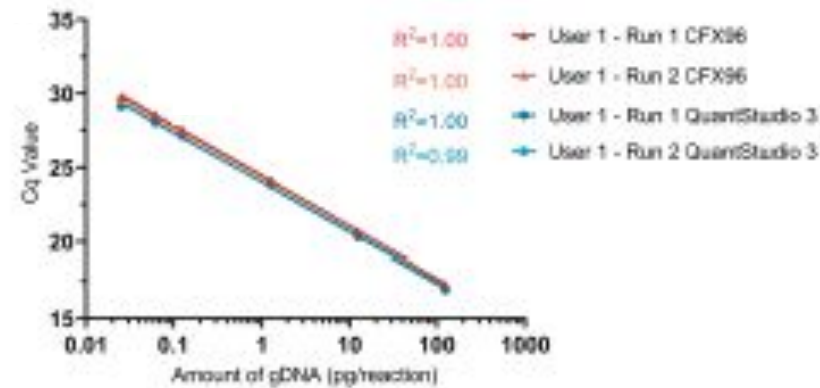
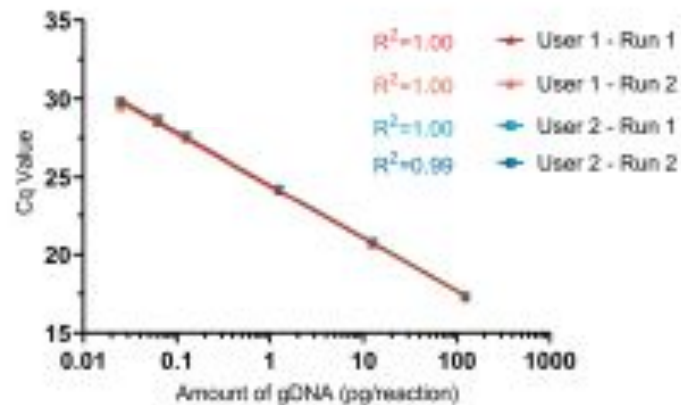


## Residual Host Cell DNA

- USP-ATCC Genomic DNA products
- Support quantitation of residual DNA by qPCR for common CGT cell lines
  - Residual HEK293 DNA
  - Residual Sf9 DNA



<https://www.usp.org/biologics/atcc-usp-genomic-dnas>

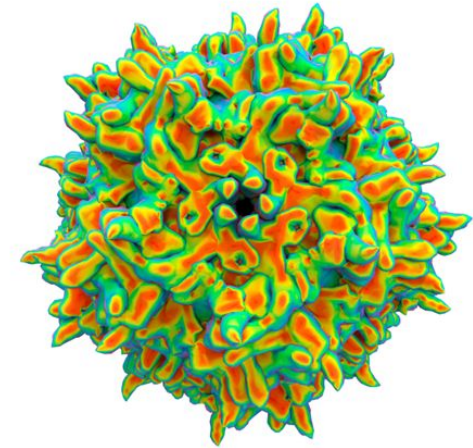


- **Immunoassays** are routinely used to monitor total HCP content
  - Reagent development and qualification can be complex
  - <1132> *Residual Host Cell Protein Measurement in Biopharmaceuticals*
    - Outlines best practices for total HCP measurement
    - Describes Immunoassay Methods, Reagents, Method Development, Qualification, and Validation
- **Mass spectrometry** is increasingly used to identify individual HCPs
  - Supports more detailed risk assessment and enables detection of HCPs that may be under-represented in immunoassay results
  - <1132.1> *Residual Host Cell Protein Measurement in Biopharmaceuticals by Mass Spectrometry*
    - Published in PF in May 2023
    - Covers Sample Preparation, Standards, Acquisition Methods, Data Processing and Reporting

# Standards and Tools in Development for Other Residual Impurities



- General Chapters (<1000) with validated methods and associated Reference Standards for
  - Replication competent testing for AAV
  - Residual testing of PEI



- Reference Materials:
  - Plasmid DNA for residual analysis (Ampicillin and Kanamycin)



- The complexity and diversity of cell and gene therapies present challenges in standardization of methods and assays
- USP is committed to working with stakeholders to streamline and expedite development of safe and effective therapies to patients
- USP will continue to support the standardization of CGT products through the development of standards and tools

## Opportunities for Engagement and Collaboration

- Roundtables and working groups
- Donate methods and/or material to support standard development
- Round Robin studies and Collaborative Testing
- Review of Chapters and Stimuli Articles on Pharmacopeial Forum
  - <https://www.uspnf.com/pharmacopeial-forum>
- Stakeholder Forum: *Nuanced Analytical Approaches to Cell and Gene Therapy* - February 22, 2024

# Thank You

diane.mccarthy@usp.org



**The standard of trust**

# NIST Genome Editing Consortium Overview



# NIST – National Institute of Standards & Technology



## MISSION

To promote U.S. innovation and industrial competitiveness by advancing **measurement science**, **standards**, and **technology** in ways that enhance economic security and improve our quality of life

Engineering

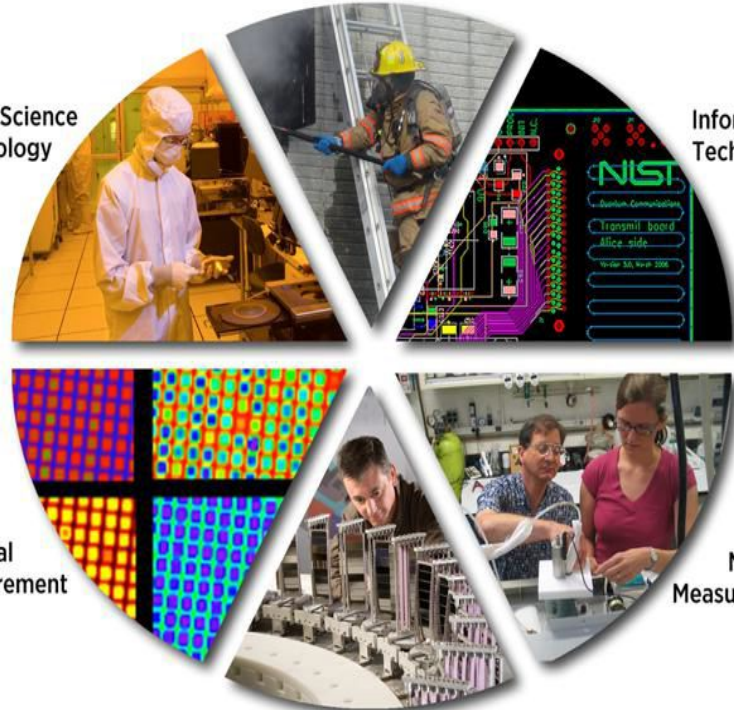
Nanoscale Science and Technology

Information Technology

Physical Measurement

Material Measurement

Neutron Research



The U.S. National Metrology Institute

Global harmonization of measurement and traceability to the SI

“Industry’s National Laboratory”

Non-regulatory agency partnering/serving industry to help maintain US leadership in science and technology products

Department of Commerce

Developing standards to support international trade and commerce

# How does NIST work with communities to meet needs?

- NIST one-on-one collaborations: Academic, Other gov., Industry
- NIST led consortia
- NIST coordination with international measurement institutes and organizations



Technology Development  
Data/Measurement Quality  
Standards

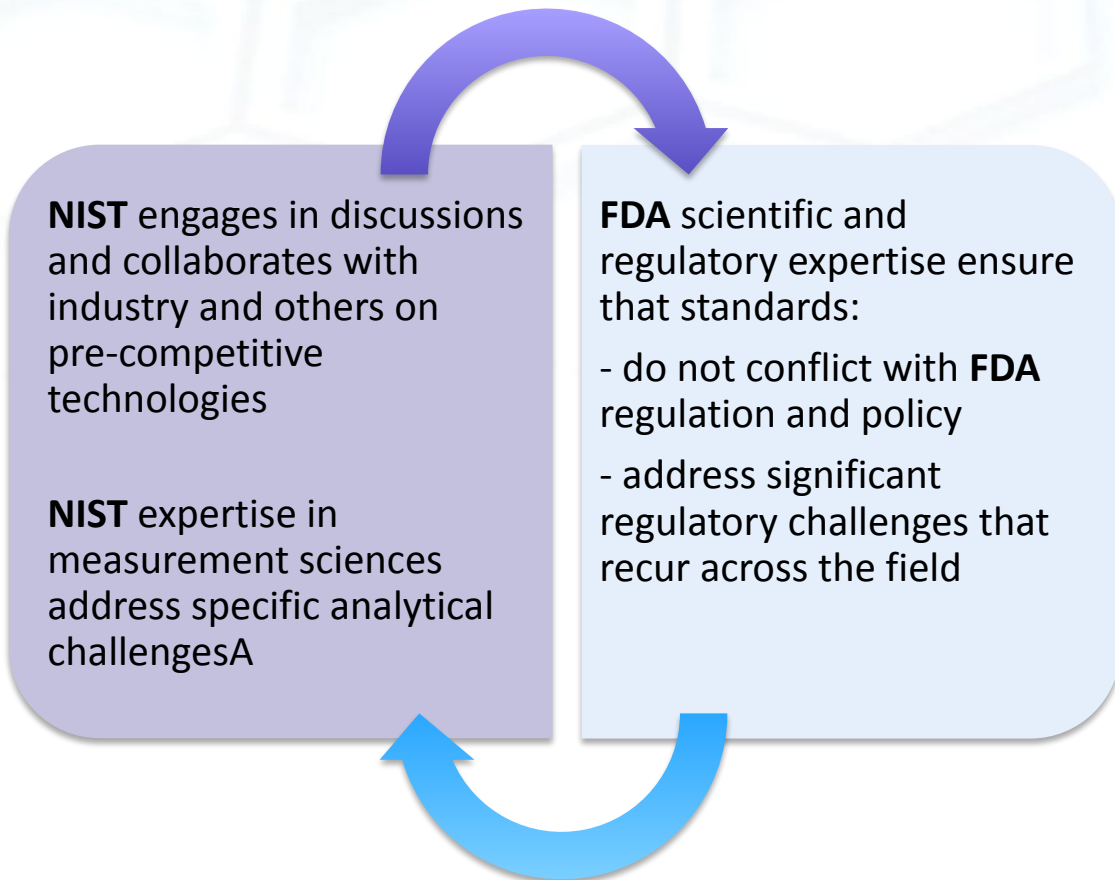


Logos included in the collage:

- JMB: The Joint Initiative for Metrology in Biology
- FDA: U.S. FOOD & DRUG ADMINISTRATION
- NIMBL: The National Institute for Innovation in Manufacturing Biopharmaceuticals
- World Health Organization
- CGE: Somatic Cell Genome Editing
- LGC
- SP: your Science Partner
- biofabusa
- DARPA
- ISO: International Organization for Standardization
- NIH: National Institutes of Health
- ANSI: American National Standards Institute
- ASTM: ASTM INTERNATIONAL
- usp: U.S. Pharmacopeia
- STANDARDS COORDINATING BODY: REGENERATIVE MEDICINE
- ERM: European Reference Materials
- PTB

# NIST-FDA Collaborations on Standards

Leveraging unique expertise



Reports

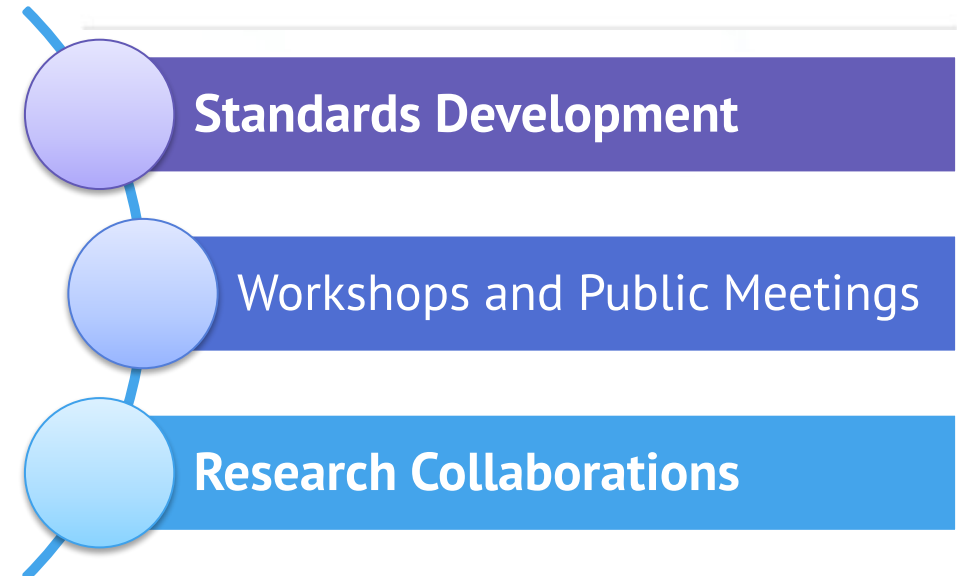
FDA and NIST collaboration on standards development activities supporting innovation and translation of regenerative medicine products

Judith A. Arcidiacono <sup>1</sup> ✉, Steven R. Bauer <sup>1</sup>, David S. Kaplan <sup>2</sup>, Clare M. Allocca <sup>3</sup>, Sumona Sarkar <sup>4</sup>, Sheng Lin-Gibson <sup>4</sup>

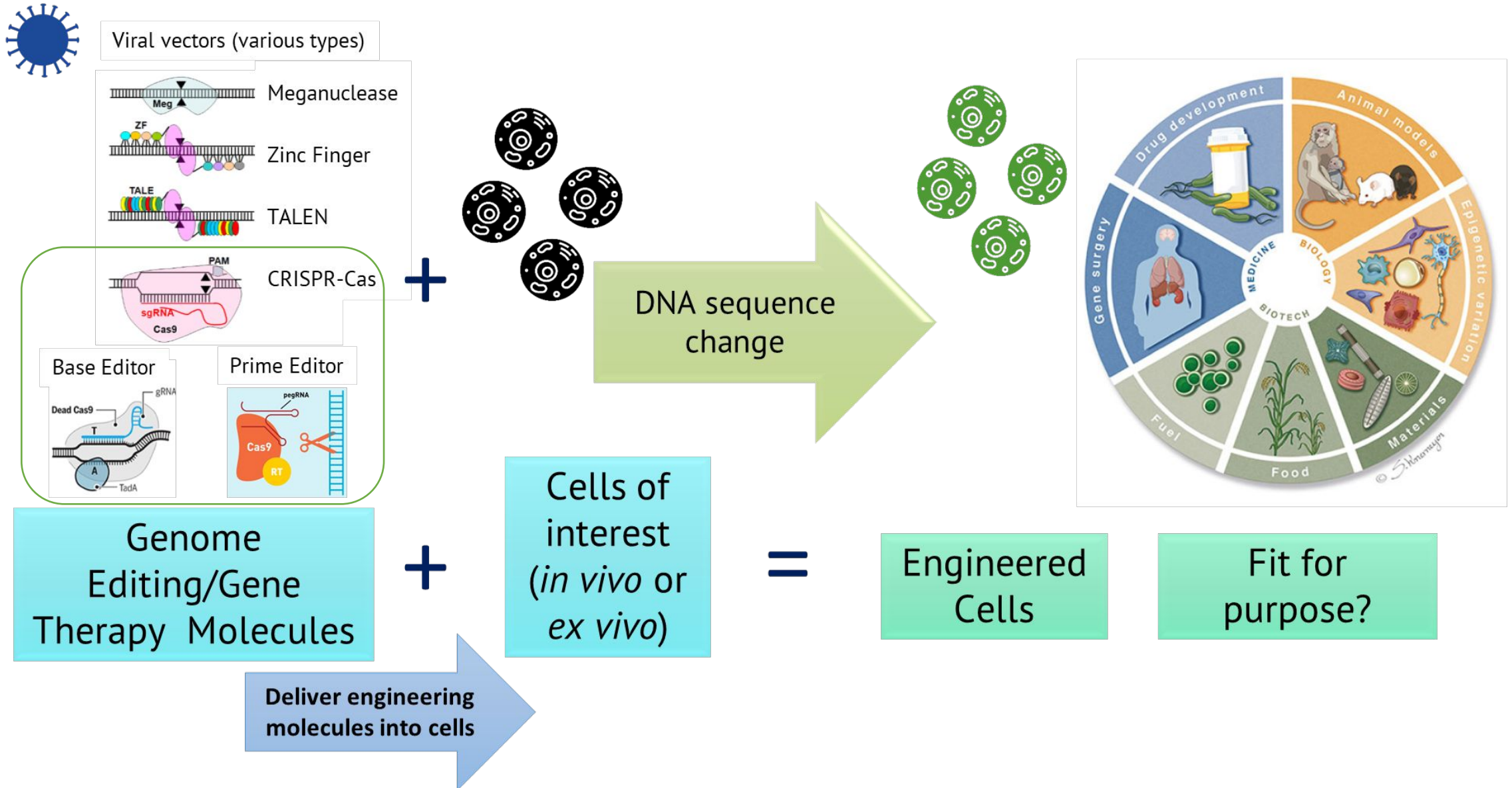
Show more

<https://doi.org/10.1016/j.jcyt.2018.03.039>

Get rights and content



# Genome Editing Overview

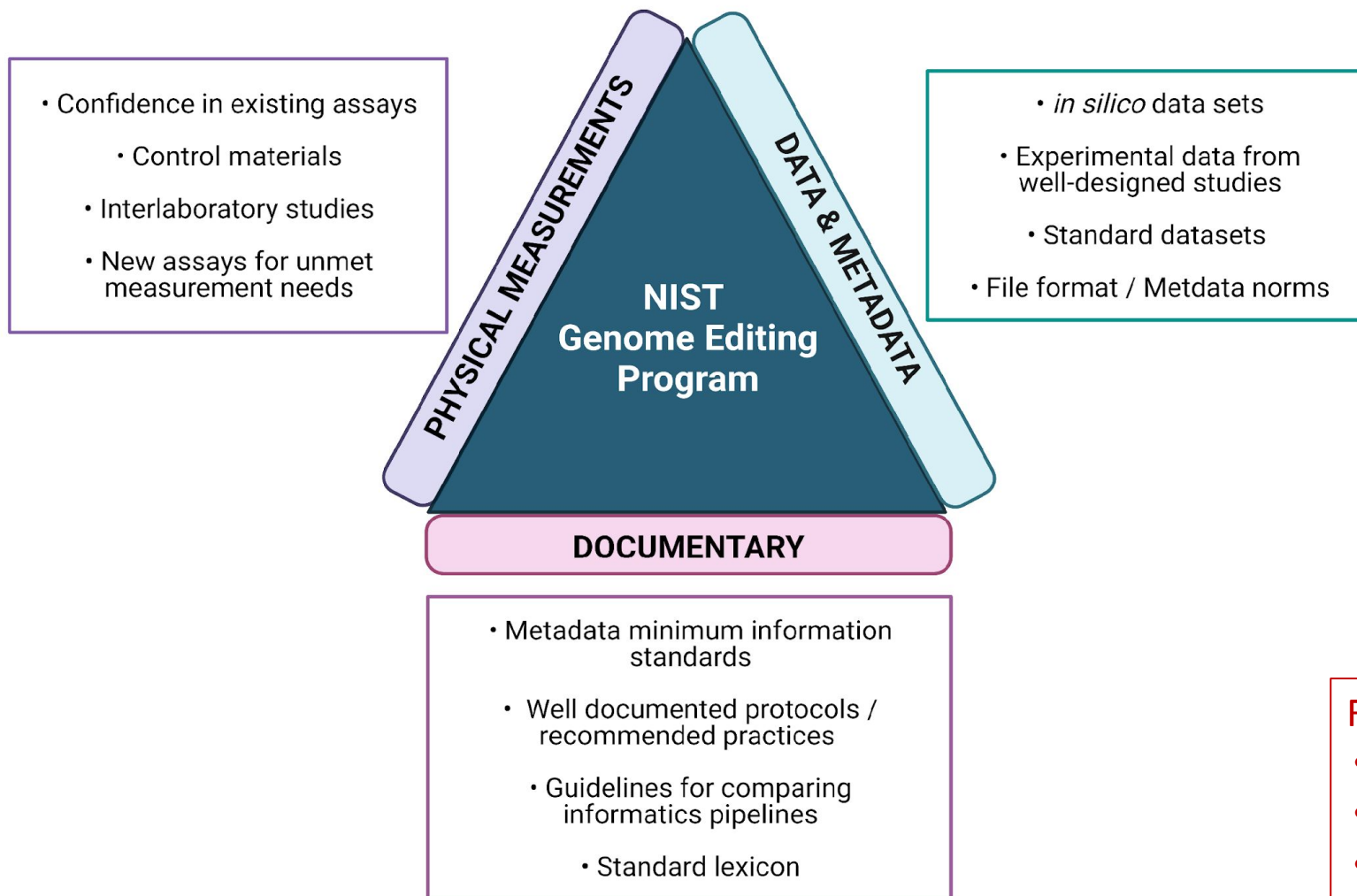


# NIST Genome Editing Program



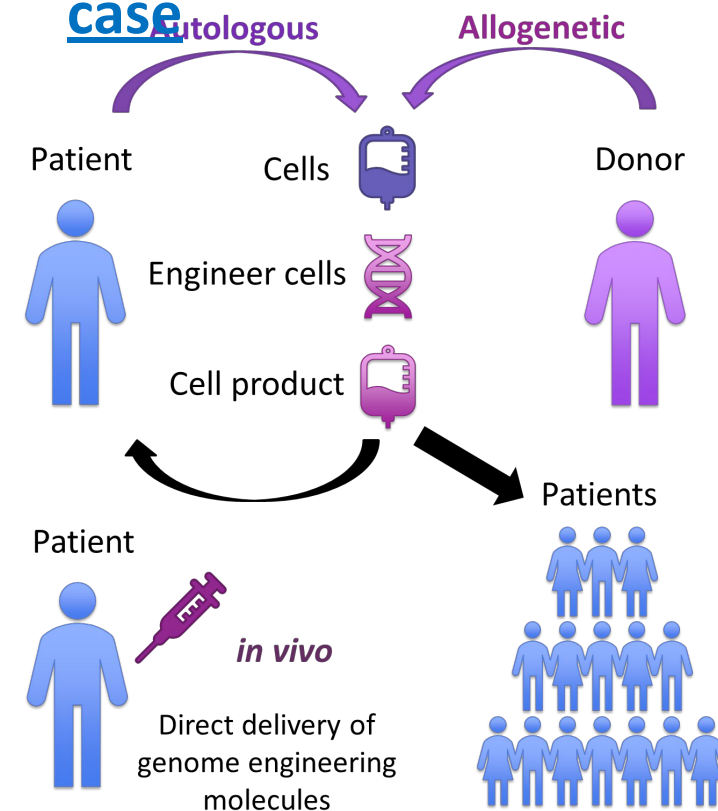
**Vision:** Support quality in measurements for translating genome edited product to market

**Goal:** Develop measurement tools standards to increase the confidence of utilizing genome editing technologies in research and commercial products.



## Gene Therapy use

case



FDA requires reporting including:

- off-target genomic positions,
- on-target and off-target sequence change
- relative frequency of variant occurrence



# Define the problem

Where in your process is it very important to know if the answer/data is reliable?

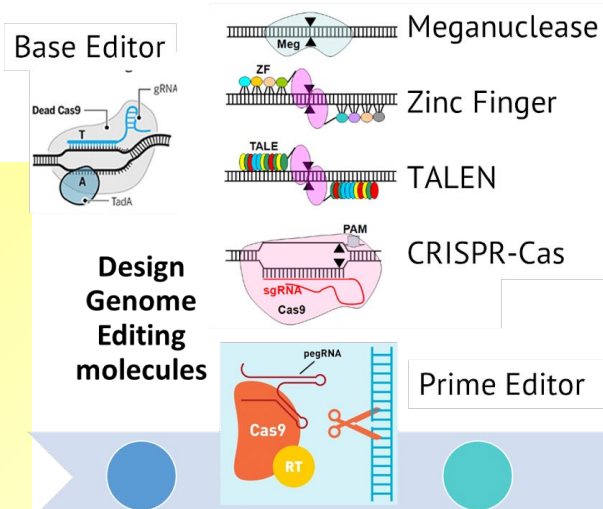
Where of these processes is it currently difficult to understand if these answers/data are reliable?

What can be done to give more confidence in these types of assays/data?

# Standards needs identified by the Genome Editing Community



Targeted Viral vectors



## Genome editing components considered critical for manufacturing!

- cGMPs should be followed during manufacturing
- Components should be tested (identity, purity, activity)
- Specifications and controls needed for qualifying these starting materials

## Where may there be off-target activity?

- Assays to detect where editing molecules cut/nick DNA
- Demonstration these assays are reliable to report nominated off-target genomic positions

## Mechanism of Action

DNA double strand break  
Deamination + DNA single strand break/nick

## What genome variants were generated?

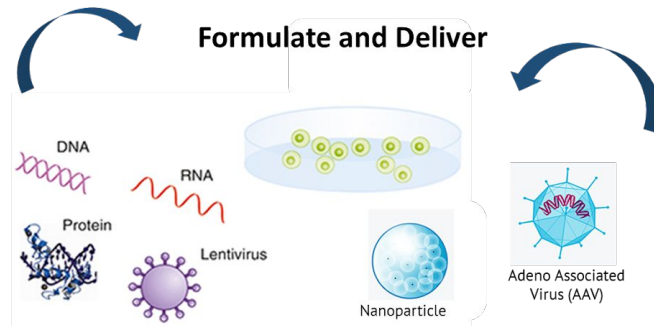
- Report off-target edits locations
- Report edits generated on-target & off-target
- Report relative frequency of edits
- Demonstrate these assays are reliable and can detect variant types/sizes.



Confirm DNA alteration

Determine fit for purpose

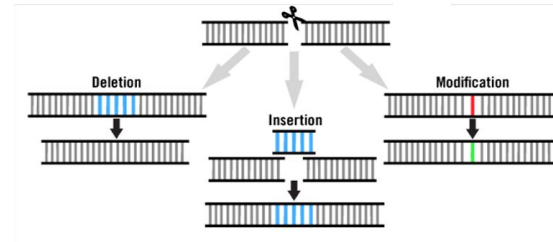
## Durability of edit(s), cell characterization, assessment of immune response



## How do we evaluate and compare delivery systems?

- Delivery systems are varied and expanding, may be part of an *ex vivo* cell engineering process or your final product, but there are no norms on how to evaluate them and compare

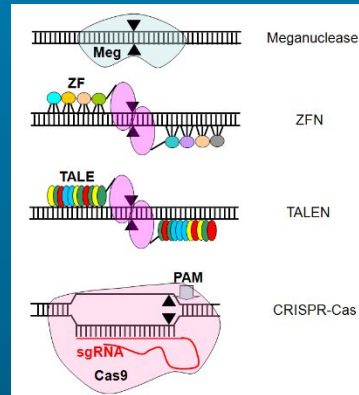
## Possible Edit Generated



## What are resources or practices to get most use out of data, understand if data is comparable, and understand bioinformatics performance?

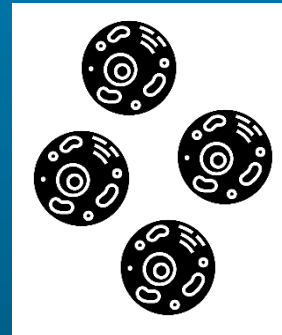
- Metadata norms and infrastructure to capture and share metadata
- Standard datasets and interlab comparisons

# Genome Editing Process



Genome Editing Molecules

+

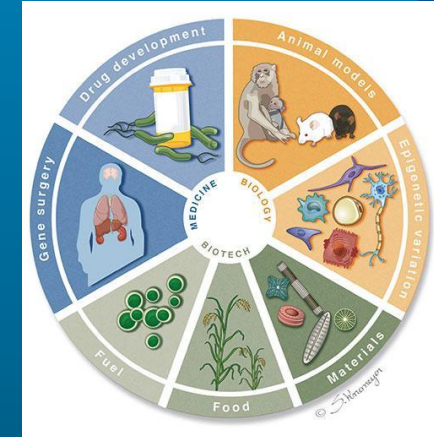


Cells of interest  
(*in vivo* or *ex vivo*)

DNA sequence change



Edited Cells



Fit for purpose?

Measurements + control samples

Data + control datasets

Metadata

# NIST Genome Editing Consortium

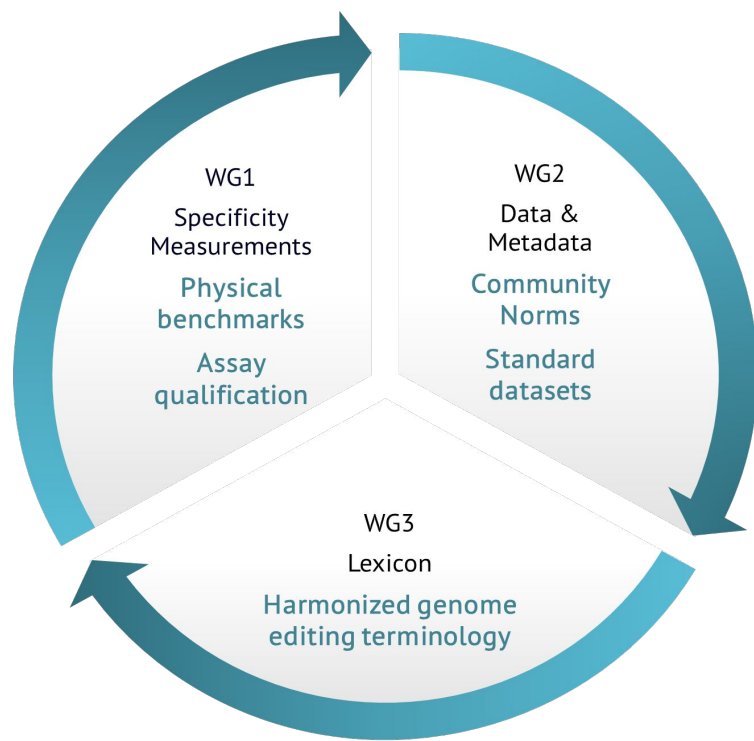
(launched October 2018, still accepting members)



## MISSION

Convene experts across academia, industry, non-profit & government to address the measurements and standards needed to increase confidence of utilizing genome editing technologies in research and commercial products

## ORGANIZATION

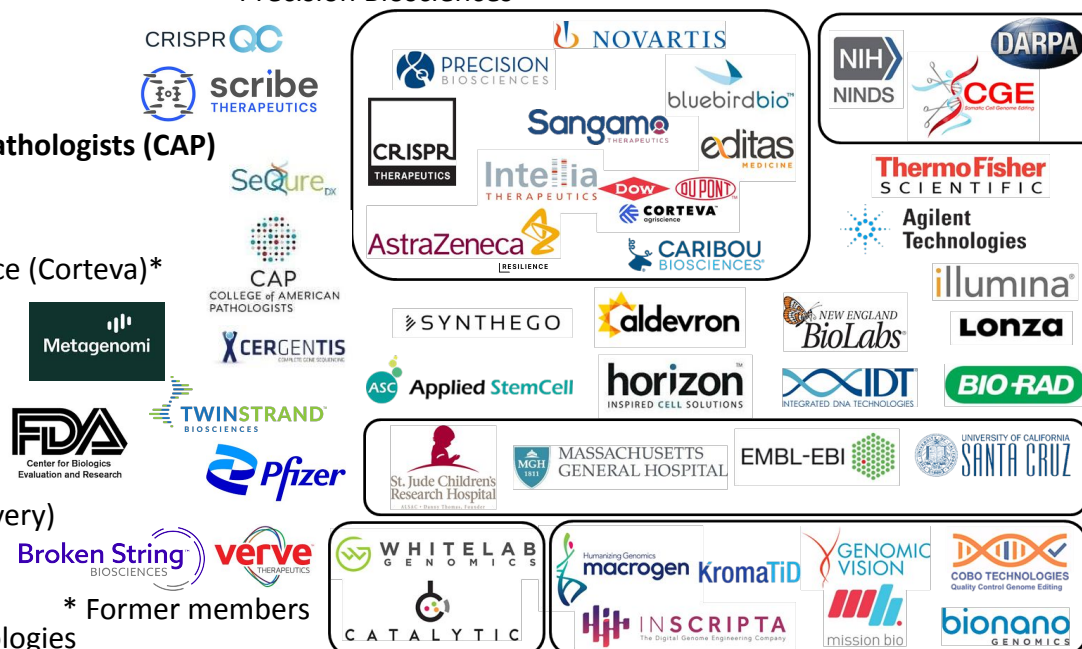


Cost sharing model. All members contribute \$20,000 annually or *in-kind*

- Abigail Wexner Research Institute at Nationwide Children's Hospital
- Agilent\*
- Alvevron
- Applied StemCell
- AstraZeneca
- Bionano Genomics
- Bio-Rad\*
- BioSkrbyb Genomics
- Bluebird bio\*
- Broken String Biosciences
- CRISPR QC
- Caribou Biosciences
- Catalytic Data Science
- Cergentis
- COBO Technologies
- College of American Pathologists (CAP)
- CRISPR Therapeutics
- DARPA
- DowDuPont Agrosience (Corteva)\*
- Editas Medicine
- EMBL-EBI
- Emerzene Inc
- FDA CBER**
- Genomic Vision
- Revvity (Horizon Discovery)
- Illumina
- Inscripta \*
- Integrated DNA Technologies
- Intellia Therapeutics
- KromaTiD
- Lonza\*
- Psomagen (Macrogen)
- Mass General Hospital
- Metagenomi
- Mission Bio
- Novartis
- New England Biolabs
- NIH/NINDS
- NIH SCGE
- Pfizer
- Precision Biosciences
- Resilience US, Inc.
- Sangamo Therapeutics
- Scribe Therapeutics
- SeQure Dx
- St. Jude Children's Research Hospital
- Synthego
- ThermoFisher Scientific
- Twinstrand Biosciences
- UCSC
- Verve Therapeutics
- WhiteLab Genomics

## MEMBERS

NIST coordinates with FDA Center for Veterinary Medicine (CVM)



## WG1: Specificity Measurements

Develop cell and DNA based control materials and test via interlab analysis (Genome in a Bottle and Human iPSCs)



Documented process, baseline data, mixture studies, interlab studies, benchmark data



DNA and cells representing a variety of DNA sequence benchmarks "looks like a genome editing output" Deeply characterized at benchmark locations

## WG2: Data & Metadata

- Community norms for data formats and tools for benchmarking data analysis (*in silico* and experimental data sets)
- Identify metadata that would be needed to be shared, housed, and interrogated from genome editing experiments and develop tools to accelerate metadata sharing

- ✓ **Transfer of Knowledge**
- ✓ **Reproducibility**

**What** are the data we are generating?  
**When** do we need to collect the metadata?  
**How** do we store data and metadata?  
**Where** do we store data and metadata

metadata from consortium studies and benchmark datasets as shared resources for the community

## WG3: Lexicon

Identify terms and related definitions to form a common genome editing community lexicon

## WG1 – Progress:

- A set of Phase 1 DNA and cell based control materials have been generated and an interlab study is completed with final data analysis in progress
- Additional engineered cell controls are in progress with some clonal cell lines completed

## WG2 – Progress:

- Phase 1 metadata entries and template completed
- Metadata schema in progress with test database integration
- Testing use cases and user interfaces, and interoperability of a metadata standard format and database(s) to house records.

## WG3 – Progress:

- ISO Standard for *Genome Editing Vocabulary* released with update July 2022

# Physical Measurement samples & data

## WG1: Specificity Measurements

### Goal:

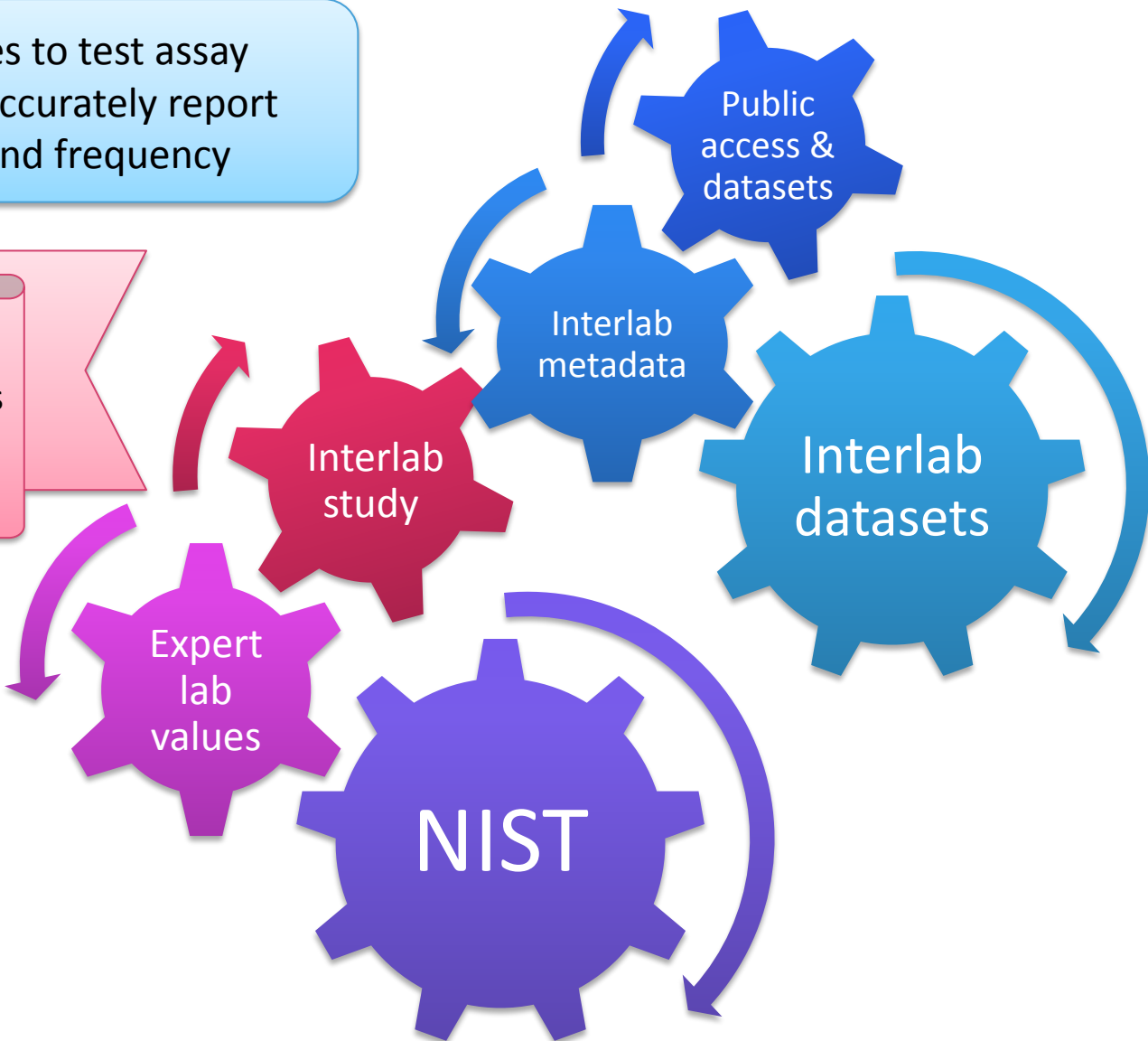
Develop DNA/cell based control materials and test analytical methods via interlab analysis



DNA and cells representing a variety of DNA sequence benchmarks “looks like a genome editing output” Deeply characterized at benchmark locations

Blinded studies to test assay capabilities to accurately report variant size and frequency

Interlab #1  
Data analysis  
and release  
in process



# Interlab Study design using unedited Genome in a Bottle samples

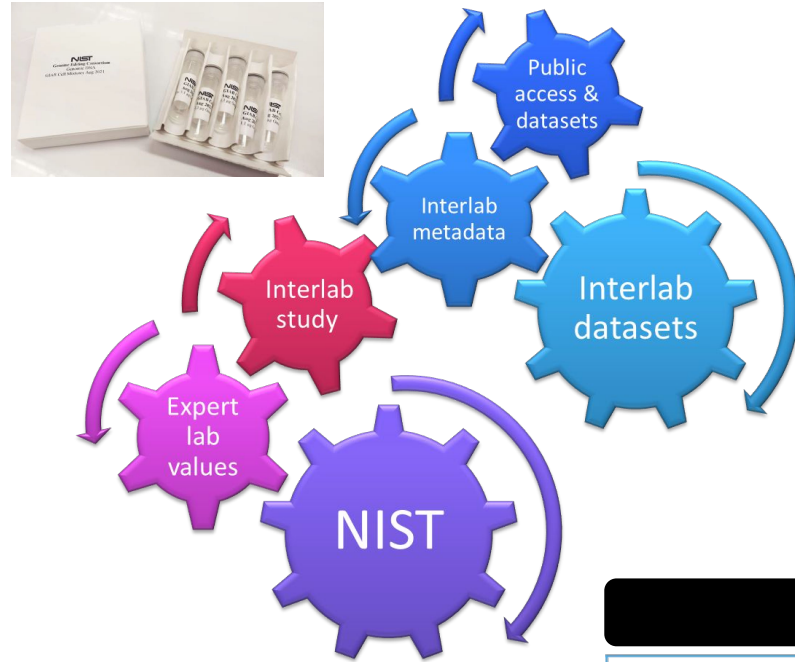
Blinded study to test assay capabilities to accurately report variant size and frequency

- Participants provided a list of **Positions of interest**, but are **blinded to the genomes uses, the variant(s), and variant frequencies**
- Samples made and qualified by NIST and expert control labs for sequence and variant frequency
- Samples bottled and shipped by NIST to interlab participants in relevant formulations for their technology (purified DNA mixtures or cell mixtures)
- Interlab participants perform DNA detection as they would normally or to test any technology of interest to verify DNA variants after editing

## Variant frequency

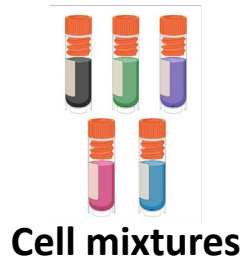
5 required samples with benchmark variant frequencies:

- ✓ 0 %
  - ✓ 0.1 – 0.25 %
  - ✓ 0.5 – 2 %
  - ✓ 5 – 10 %
  - ✓ > 30 % (high variant control)
- 2 optional samples
- 0.01 – 0.025 %
  - 0.001 – 0.0025 %



## Variant sequence identity (length and/or sequence)

Substitutions	< 15 bp del	< 50 bp del	~ 300 – 500 bp del	> 2 kb ins
Small complex	< 15 bp ins	< 50 bp ins	~ 300 – 500 bp ins	~ 10 kb del
1 bp del	< 25 bp del	~150 bp del	~ 1 – 2 kb del	~ 10 kb ins
1 bp ins	< 25 bp ins	~ 150 bp ins	~ 1 – 2 kb ins	> 50 bp del

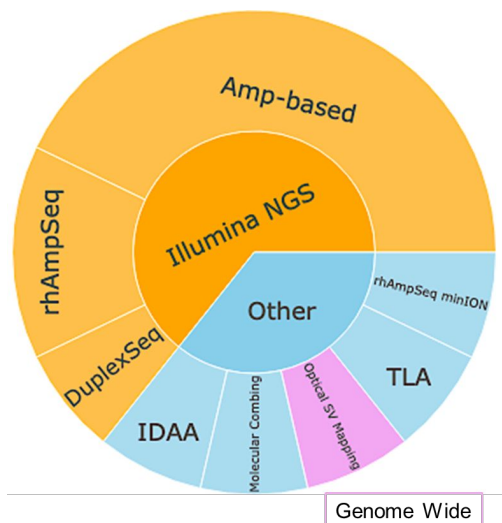


Justin Zook



Nate Olson

# Overview of interlab participation



14 total participants  
(2 of which were unblinded)

**6** Technology Users      **8** Technology Makers

<b>Blinded:</b>	6	6
<b>Unblinded:</b>	0	2
<b>Cells:</b>	0	5
<b>DNA:</b>	6	3
<b>Illumina NGS-based:</b>	6	5
<b>DNA electropherogram:</b>	0	1
<b>DNA imaging/microscopy:</b>	0	2
<b># Replicates:</b>	1-4	1-4
<b># Workflows per submitter:</b>	1-2	1-2

NOT IDENTIFIED with their data      IDENTIFIED with their data

**TECHNOLOGY MAKERS:**

- Bionano Genomics, Inc.
- BioSkryb Genomics
- Cergentis
- COBO Technologies
- Genomic Vision
- Illumina
- MissionBio
- TwinStrand Biosciences

**TECHNOLOGY USERS:**

- CRISPR Therapeutics
- Editas Medicine
- IDT
- Intellia Therapeutics
- St. Jude Children's Research Hospital

[additional participants not listed]



# Metadata & Data Return

## Structured Experimental Metadata

- |  |  |
|--|--|
| <input type="checkbox"/> Date                                | <input type="checkbox"/> Multiplex PCR process                   |
| <input type="checkbox"/> Sequencing Assay Type               | <input type="checkbox"/> Sequencing Platform                     |
| <input type="checkbox"/> Sequencing Reagents or Kit          | <input type="checkbox"/> Flowcell kit or Capillary type          |
| <input type="checkbox"/> DNA Concentration per reaction (ng) | <input type="checkbox"/> # Libraries pooled onto flowcell        |
| <input type="checkbox"/> # Library Replicates                | <input type="checkbox"/> # Libraries pooled per lane of flowcell |
| <input type="checkbox"/> UMI - used/index or in-line/length  | <input type="checkbox"/> Read depth per panel                    |
|  | <input type="checkbox"/> Re-Quantification instrument/kit        |
|  | <input type="checkbox"/> Re-Quantification concentration (ng/uL) |

## Structured Results Reporting

- |  |   |
|--|---|
| <input type="checkbox"/> Coordinates   | <input type="checkbox"/> Variant size (bp)                              |
| <input type="checkbox"/> Reference Sequence  | <input type="checkbox"/> Reads or Signal for Variant                    |
| <input type="checkbox"/> Variant Sequence  | <input type="checkbox"/> Variant Frequency (%)                          |
| <input type="checkbox"/> Variant Type (substitution, deletion, insertion, complex) | <input type="checkbox"/> Confidence or Significance of Variant Call (%) |
| <input type="checkbox"/> Total Reads for Signal or Site                            | <input type="checkbox"/> Describe how confidence is determined          |

## Structured Bioinformatics Metadata

- Average read length used to call variant
- Amplicon/Average fragment length of DNA sequenced
- Median observed read length
- Software – name, version
- Parameters
- Code

## Requested Raw & Additional Data

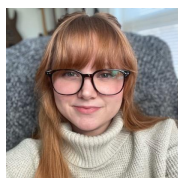
- | Raw                             | Processed                      |
|---------------------------------|--------------------------------|
| <input type="checkbox"/> .fsa   | <input type="checkbox"/> .bed  |
| <input type="checkbox"/> .fastq | <input type="checkbox"/> .smap |
| <input type="checkbox"/> .bnx   | <input type="checkbox"/> .vcf  |
|                                 | <input type="checkbox"/> .bam  |

### Other

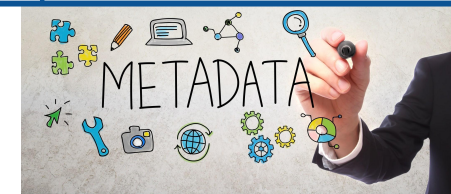
- QC Reports
- Images
- READMEs
- Protocols

### Total Data Size:

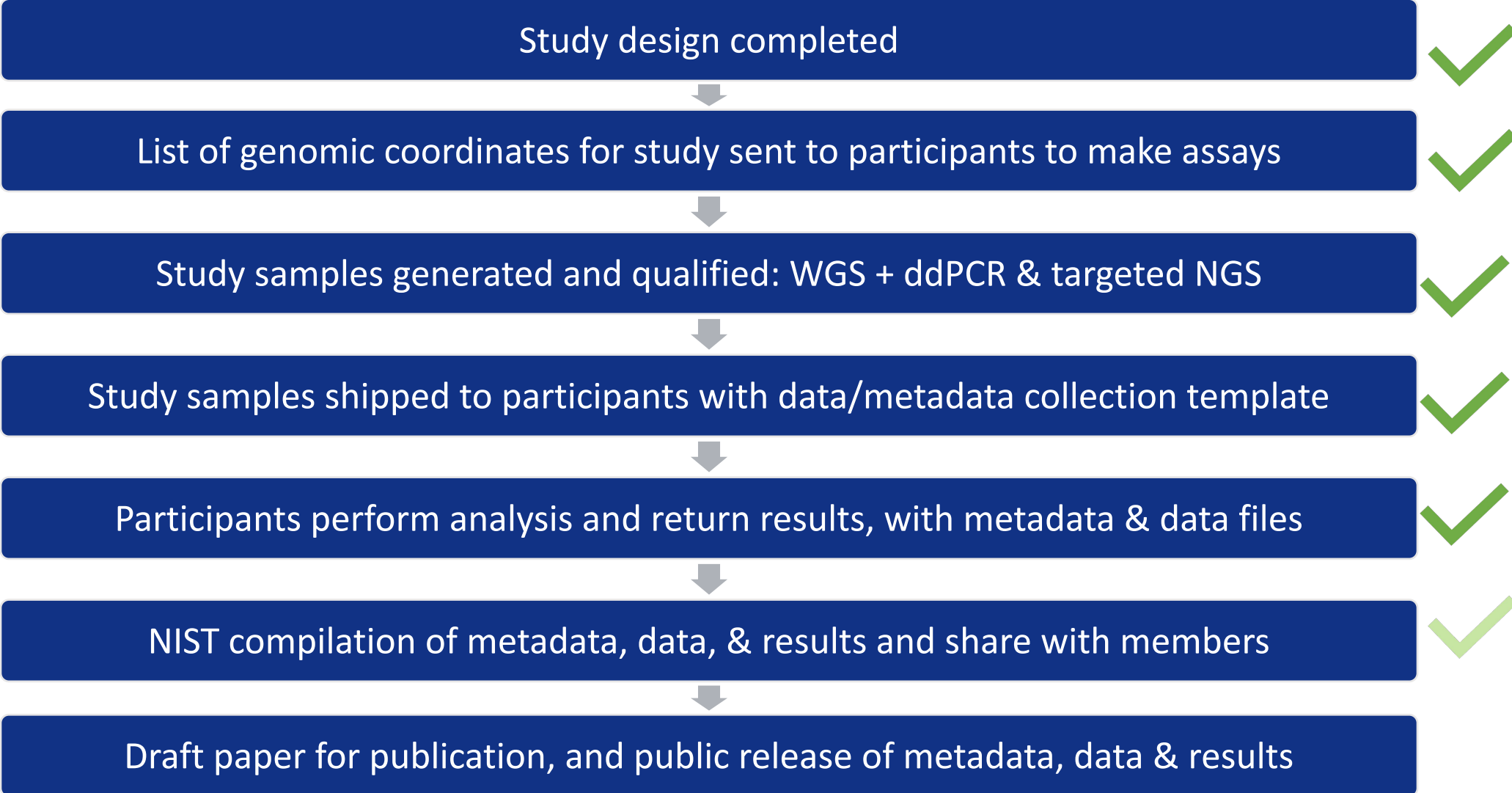
~ 43Tb



Sierra Miller



# GIAB Interlab Mixture Study: Overview & Progress



# ?? Data & Metadata: A Need for Standards NIST

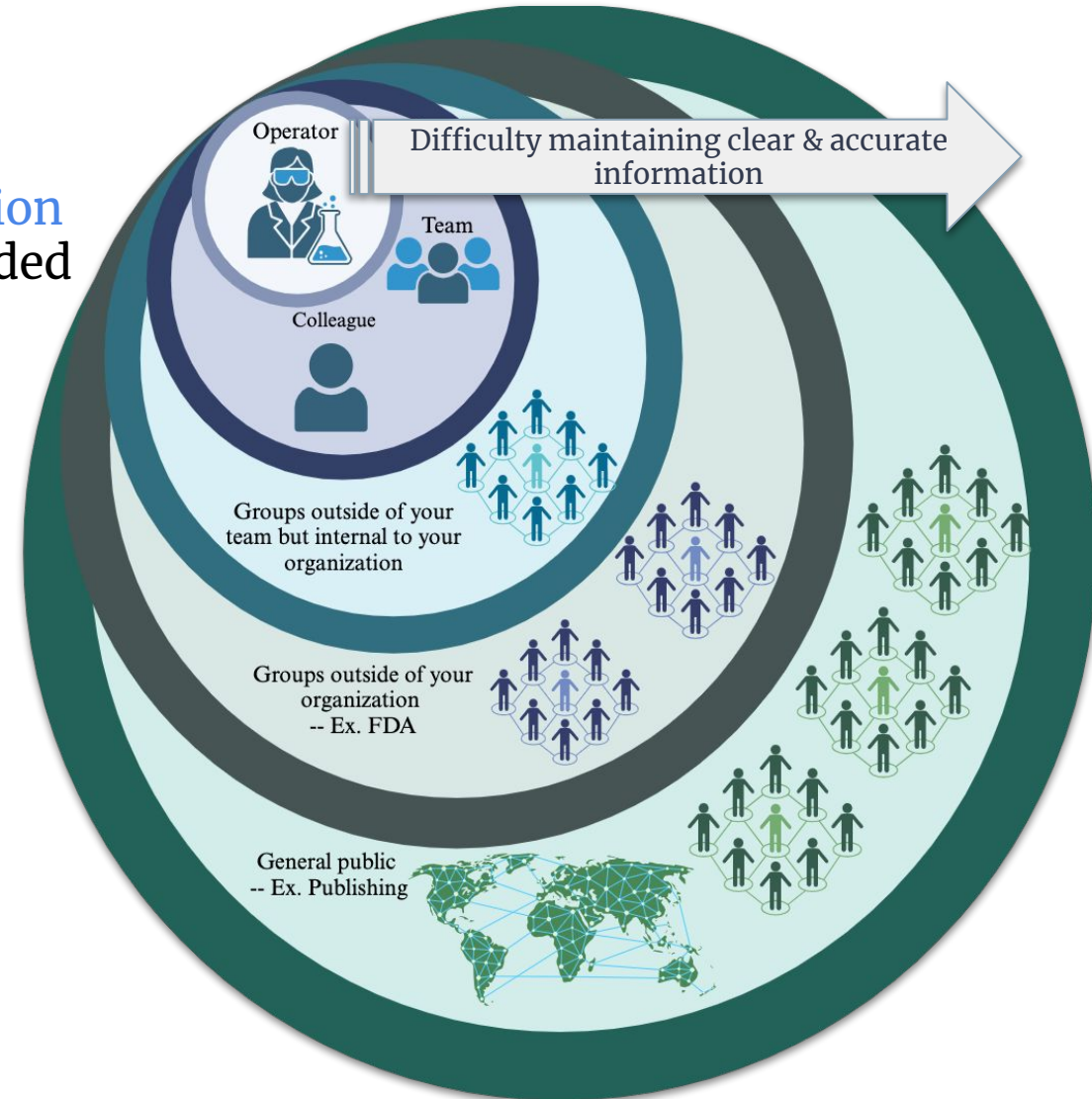


**Knowledge Transfer** – **comprehending** what that **information** is or is not telling you – only as good as the metadata provided

There is a need for accessible, organized, & structured metadata with understood terms to promote:

- scientific integrity
- reproducibility
- efficiency
- sharing
- Findable Accessible Interoperable Reusable
- cooperation
- knowledge transfer
- scientific advancement
- positive public perception

(FAIR) Data Principles



# Data & Metadata norms and tools for Genome Editing

- ✓ Transfer of Knowledge
- ✓ Reproducibility

**What** are the data we are generating?

**When** do we need to collect the metadata?

**How** do we store data and metadata?

**Where** do we store data and metadata

metadata from consortium studies & benchmark datasets as shared resources for the community

## 2. Metadata file format (GEM)

JSON format

1. Human readable
2. Database ready
3. Can be validated (JSON Schema)
4. Already used by NIST
5. Easy to extend



METADATA

## 3. Metadata access

Design and feasibility of a database with easy user interface

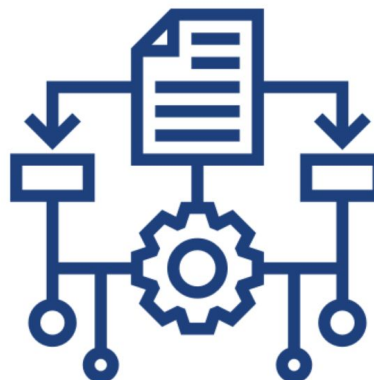


## 1. Metadata entry curation:

(how can this be normalized and low burden for a user)

EDITOR-PROTEIN	
metadata_field	example
Editor Type	(Cas, TALEN, Zinc Finger)
Reagent Type	(mRNA, plasmid, protein)
PAM Preference	(3' NGG)
Target Sequence	((i.e. for TALEN or ZFN))
Editor Cleavage Type	(blunt)
Editor Activity	(Target strand nickase)
Editor Protein Variant	(i.e., D10A)
Annotated Map	(annotated genbank sequence file, filename here)
Editor Substrate	(double stranded DNA)
Editor Alias	(NA)
Source	(IDT)
Editor Subtype	(Cas9)
Editor Species	(S. pyogenes)

## 4. Datasets as control data linked to metadata



Target sequences  
(may have multiple target sequences) (region of the genome targeted).

Target sequence 1 \*

× Target sequence ↓

Target sequence 2 \*

× Target sequence ↑

+ Target sequence × Last Target sequence × All

Targeting Strand

Target start



## Genome Editing Concepts

Gene editing  
Genome editing  
Genome engineering  
Specificity  
Target  
Off-target

## Genome Editing Tools

### General

Site-directed nuclease  
Site-directed DNA modification enzyme  
Repair template

### CRISPR-Specific

Guide RNA (gRNA)  
CRISPR RNA (crRNA)  
tracrRNA (trans-activating CRISPR RNA)  
sgRNA (single-guide RNA)  
PAM (protospacer adjacent motif)  
RNP (ribonucleoprotein)  
Cas nuclease target site  
Target strand

## Genome Editing Tools

### Meganuclease - Specific

Meganuclease  
Meganuclease single chain  
Meganuclease linker  
Meganuclease target site

### TALEN - Specific

TALEN  
TALEN linker  
Repeat variable diresidue (RVDs)  
TALEN target site

### megaTAL - Specific

megaTAL  
megaTAL linker  
megaTAL target site

### ZFN - Specific

Zinc Finger Nuclease (ZFN)  
ZFN linker  
Zinc Finger Protein (ZFP)  
Zinc Finger  
Recognition helix  
ZFN target site

## Genome Editing Outcomes

Edit  
Unintended edit  
Intended edit  
HDR (homology-directed repair)  
NHEJ (non-homologous end-joining)  
Microhomology-Mediated End Joining  
Repair (MMEJ)  
InDel mutation

# Lexicon contributing drafting organizations and expert commenters

## Industry and commerce – large industry

- Novartis
- AstraZeneca
- Thermo Fisher Scientific
- New England Biolabs
- Illumina
- Lonza
- Johnson & Johnson

## Industry and commerce – SMEs

- Bluebird bio
- Caribou Biosciences
- Corteva Agrosience
- CRISPR Therapeutics
- Editas Medicine
- Horizon Discovery
- Integrated DNA Technologies
- Intellia Therapeutics
- Precision Biosciences
- Sangamo Therapeutics
- Synthego
- Casebia Bio

## Government

- FDA
- USDA
- NIH

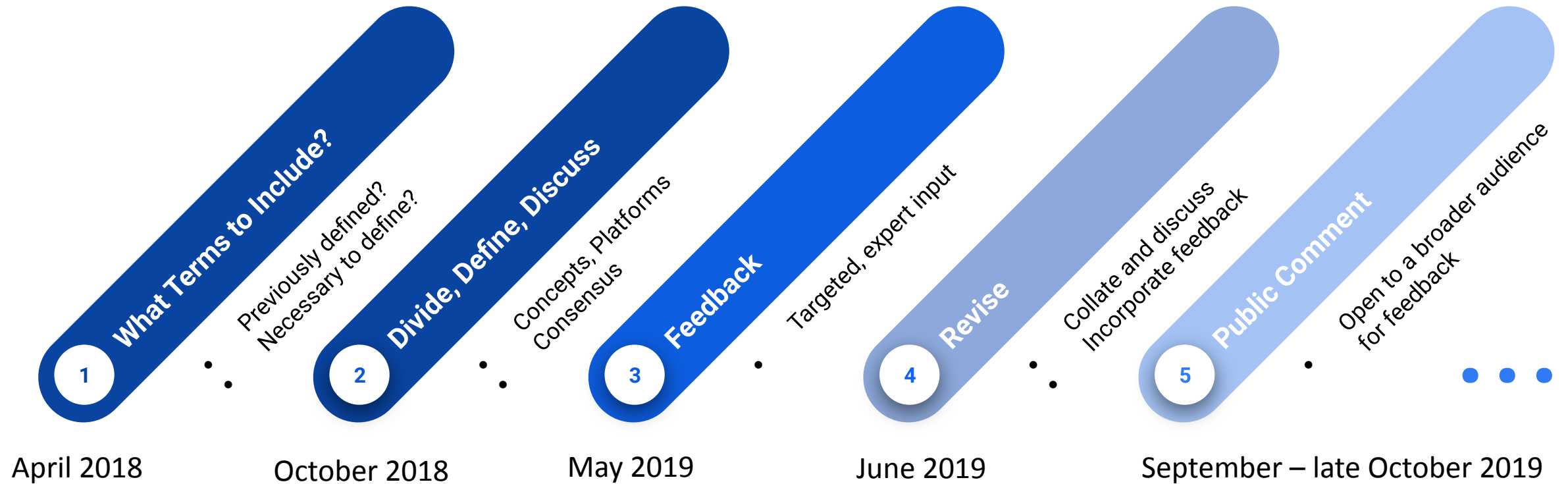
## Academic and research bodies

- Harvard University
- St Jude Children's research hospital
- The Broad Institute
- MIT
- Stanford University
- University of California Berkeley
- The Jackson Labs
- The University of Copenhagen
- The CRISPR Journal
- NC State University
- The University of Massachusetts Medical School
- UCSF
- UCSC

## Non-governmental organizations

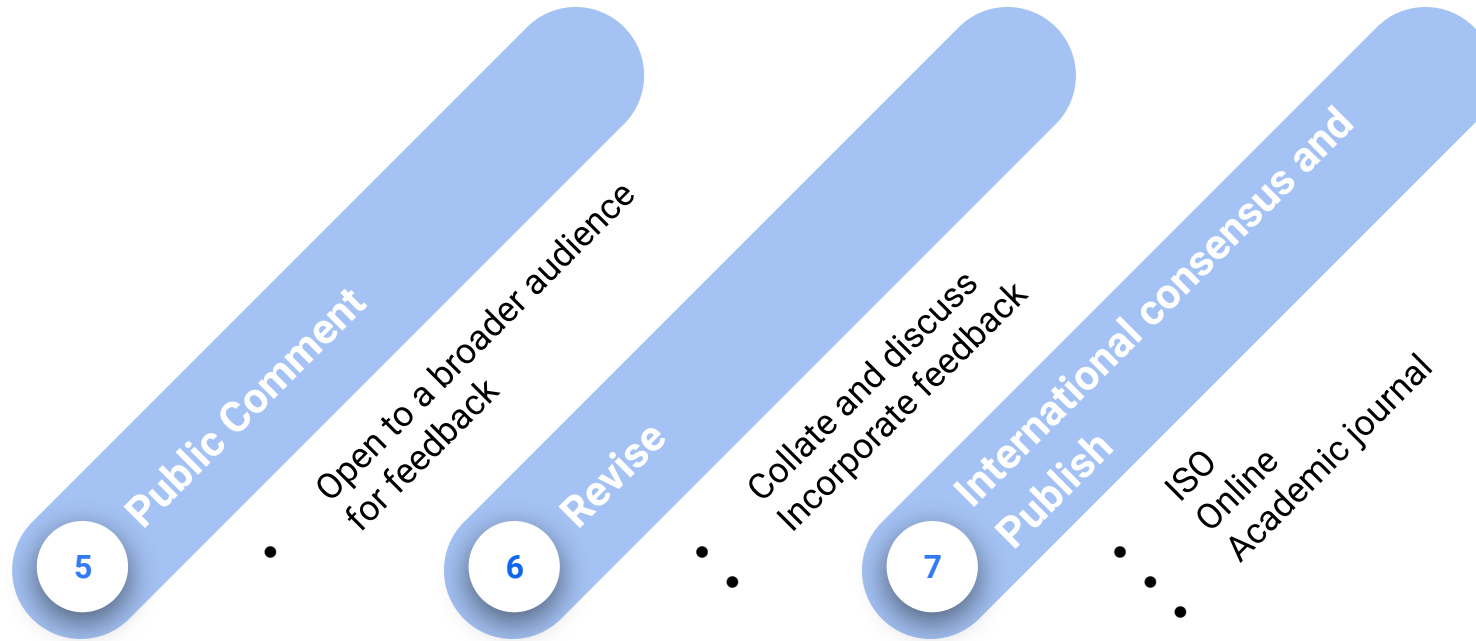
- EMBL-EBI
- The World Health Organization
- Alliance for Regenerative Medicine
- USP

# Process prior to ISO submission





# Process prior to ISO submission continued



September – late October 2019

Dec 2019 – proposed as new project at ISO meeting  
May 2020 – ISO project began...

# ISO 5058-1:2021 Genome editing – Part 1: Vocabulary



NIST

https://www.iso.org/standard/80679.html

https://www.i

https://www.iso.org/obp/ui/#iso:std:iso:5058:-1:ed-1:v1:en



Online Browsi

Online Browsing Platform (OBP)

ICS > 07 > 07.080

## ISO 5058-1 Biotechnology –

ABSTRACT

PREVIEW

This document defines terms related to gen

This document is applicable to general use

### GENERAL INFORMATION

Status : © Published

Edition : 1

Technical Committee : ISO/TC 276 Biotechnr

ICS : 07.080 Biology, Botany, Zoology | 01.0  
(Vocabularies)

ISO 5058-1:2021(en) Biote

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ISO 5058-1:2021(en) Biotechnology – Genome editing – Part 1: Vocabulary

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### 3 Terms and definitions

ISO and IEC maintain terminological databases for use in standardization at the following addresses:

— ISO Online browsing platform: available at <https://www.iso.org/obp>

— IEC Electropedia: available at <http://www.electropedia.org/>

#### 3.1 Genome editing concepts

##### 3.1.1

##### gene editing

techniques for **genome engineering** (3.1.3) that involve nucleic acid damage, repair mechanisms, replication and/or recombination for incorporating site-specific modification(s) into a gene or genes

Note 1 to entry: Gene editing is a subclass of **genome editing** (3.1.2).

Note 2 to entry: There are various genome editing tools (see 3.2 and Figure 1).

##### 3.1.2

##### genome editing

techniques for **genome engineering** (3.1.3) that involve nucleic acid damage, repair mechanisms, replication and/or recombination for incorporating site-specific modification(s) into a genomic DNA

Note 1 to entry: **Gene editing** (3.1.1) is a subclass of genome editing.

Note 2 to entry: There are various genome editing tools (see 3.2 and Figure 1).

Genome editing technology is a fast-growing and rapidly advancing global bioscience field with applications in many biotechnology sectors. Genome editing is used to modify the nucleic acids of a genetic code, which can be composed of DNA or RNA, in a site-specific manner. Modifications can include insertion, deletion or alteration of nucleic acids. The technology operates by biochemical

# Ontology for Genome Editing Lexicon now in BioPortal



## NIST Genome Editing Lexicon

Last uploaded: December 8, 2021



- Summary
- Classes
- Properties
- Notes
- Mappings
- Widgets

### Details

Acronym	NIST_GEL
Visibility	Public
Description	Genome editing technology is a fast-growing and rapidly advancing global bioscience field with applications in many biotechnology sectors. Genome editing is used to modify the nucleic acids of a genetic code, which can be composed of DNA or RNA, in a site-specific manner. Modifications can include insertion, deletion or alteration of nucleic acids. The technology operates by biochemical principles generally applicable to every kind of cell. Examples of genome editing technology applications with global significance include human cell-based therapeutics, agriculture, microbial based therapeutics, synthetic biology and biomanufacturing. While genome editing technology is being actively utilized, there is a need for international standardization in terms and definitions for this field, so as to enhance interpretation and communication of concepts, data and results. This document has been developed to provide a unified standard set of terms and definitions that serve the needs of biotechnology stakeholders and act as a reference for genome editing technology. Standards in the field of genome editing are intended to harmonize and accelerate effective communication, technology development, qualification and evaluation of genome editing products. This document is expected to improve confidence in and clarity of scientific communication, data reporting and data interpretation in the genome editing field. Specific requirements for the application of genome editing technologies in agriculture and food are not included. For specific requirements, users can consult standards developed by appropriate ISO Technical Committees, e.g. ISO/TC 34/SC 16 Horizontal methods for molecular biomarker analysis, or ISO/TC 215 Health informatics.
Status	Production
Format	OWL
Contact	Sierra D. Miller, sierra.miller@nist.gov
Categories	Gene Product, Genomic and Proteomic, Molecule

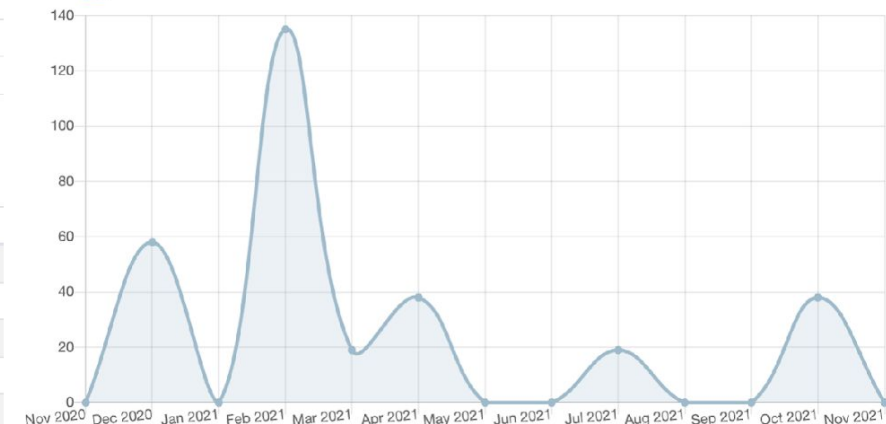
### Submissions

Version	Released	Uploaded	Downloads
2.1 (Uploaded)	11/23/2020	12/08/2021	<a href="#">OWL</a>
2.0 (Parsed, Metrics, Annotator, Error Indexed)	11/23/2020	12/01/2021	<a href="#">OWL</a>   <a href="#">CSV</a>   <a href="#">RDF/XML</a>   <a href="#">Diff</a>
1.3_relationship_test (Archived)	11/23/2020	02/11/2021	<a href="#">OWL</a>   <a href="#">Diff</a>
1.2 (Archived)	11/23/2020	01/21/2021	<a href="#">OWL</a>   <a href="#">Diff</a>
1.1 (Archived)	11/23/2020	11/30/2020	<a href="#">OWL</a>   <a href="#">Diff</a>

### Metrics

Classes	52
Individuals	0
Properties	9
Maximum depth	4
Maximum number of children	9
Average number of children	4
Classes with a single child	2
Classes with more than 25 children	0
Classes with no definition	10

### Visits



# Ontology for Genome Editing Lexicon now in BioPortal



BioPortal

Ontologies Search Annotator Recommender Mappings

sdmiller ▾ Support ▾

## NIST Genome Editing Lexicon

Last uploaded: December 8, 2021



Summary **Classes** Properties Notes Mappings Widgets

Jump to:

Biotechnology — Genome editing — Part 1: Vocabulary

Genome editing concepts

**gene editing**

genome editing

genome engineering

off-target

specificity

target

Genome editing outcomes

edit

HDR

indel

intended edit

MMEJ

NHEJ

unintended edit

Genome editing tools

General

CRISPR specific

Cas nuclease

Cas nuclease target site

crRNA

gRNA

PAM

**Details** Visualization Notes ( 0 ) Class Mappings ( 2 )

Preferred Name	gene editing
Definitions	techniques for genome engineering that involve nucleic acid damage, repair mechanisms, replication and/or recombination for incorporating site-specific modification(s) into a gene or genes
ID	<a href="http://webprotege.stanford.edu/RC2MgsCJHIZLN15AOCVukBH">http://webprotege.stanford.edu/RC2MgsCJHIZLN15AOCVukBH</a>
definition	techniques for genome engineering that involve nucleic acid damage, repair mechanisms, replication and/or recombination for incorporating site-specific modification(s) into a gene or genes
label	gene editing
note	There are various genome editing tools
prefLabel	gene editing
subClassOf	<a href="#">Genome editing concepts</a>



## GENOME IN A BOTTLE (GIAB) CONSORTIUM

Provides authoritative characterization of benchmark human genomes

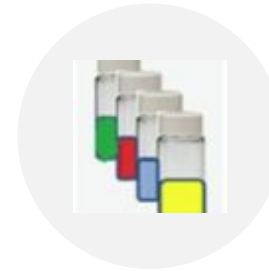
*POC: Justin Zook*



## GENOME EDITING CONSORTIUM

Addresses the measurements and standards needed to increase confidence and lower the risk

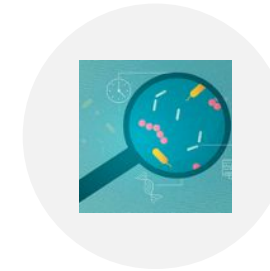
*POC: Samantha Maragh*



## FLOW CYTOMETRY STANDARDS CONSORTIUM

Addresses the measurements and standards needed for flow cytometry applications

*POC: Lili Wang*



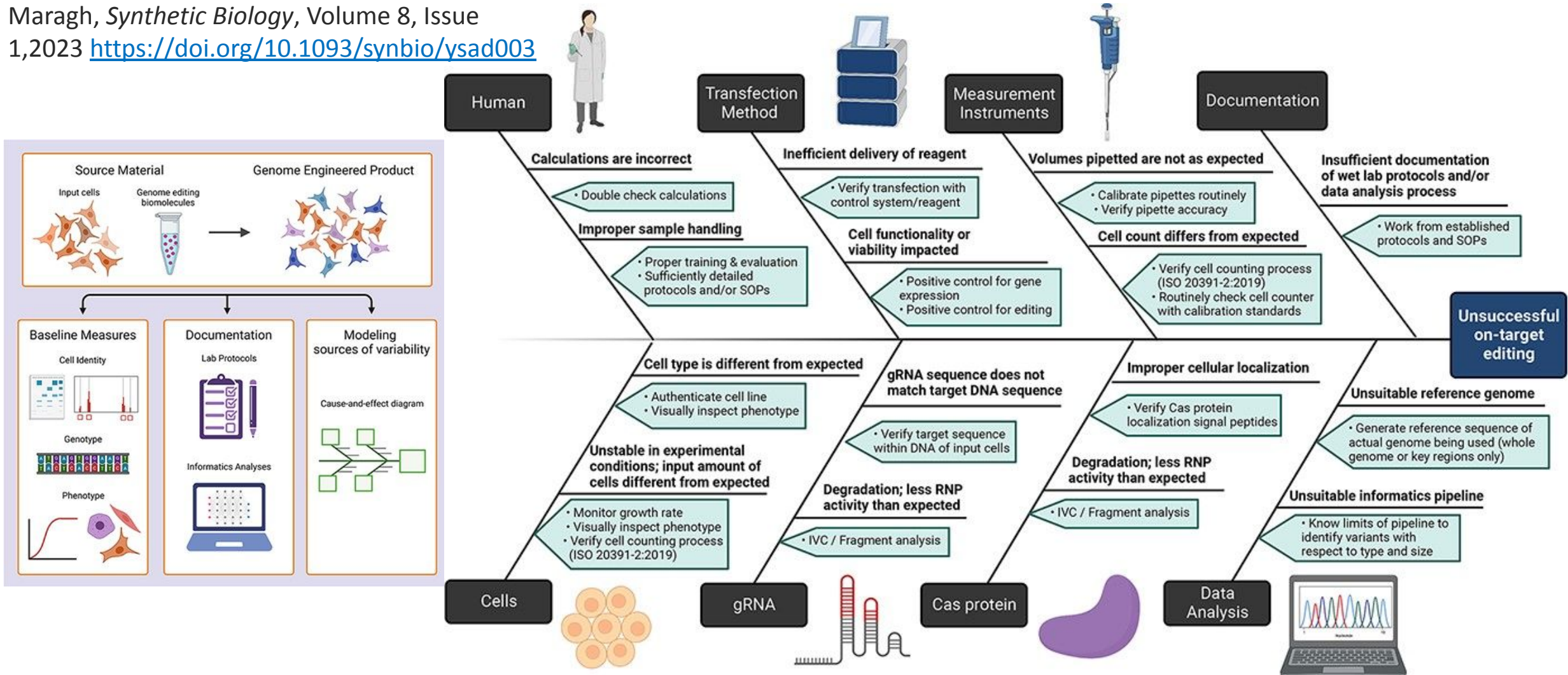
## RAPID MICROBIAL TESTING METHODS CONSORTIUM

Addresses the measurements and standards needed to increase confidence and lower the risk

*POC: Nancy Lin*

# Variability in genome-engineering source materials: consider your starting point

Simona Patange, Sierra Miller, Samantha Maragh, *Synthetic Biology*, Volume 8, Issue 1, 2023 <https://doi.org/10.1093/synbio/ysad003>



# Fire Burn and Cauldron Bubble: What Is in Your Genome Editing Brew?

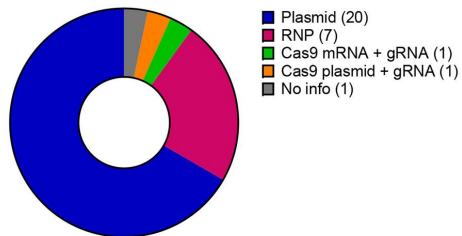
Simona Patange and Samantha Maragh

Biochemistry DOI: 10.1021/acs.biochem.2c00431

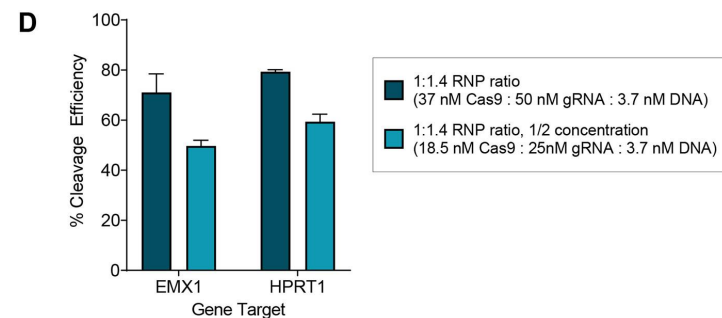
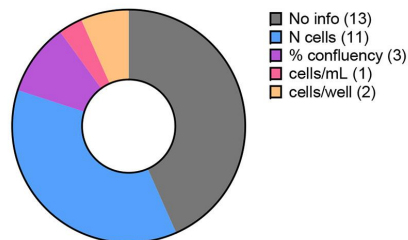
## A Reporting of CRISPR reagents in 30 publications

		Cas9				
		No info	grams	mols	g/L	M
gRNA	No info	9				
	grams		14			
	mols		1	2		
	g/L				1	
	M					3

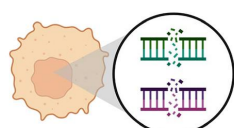
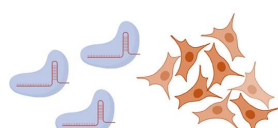
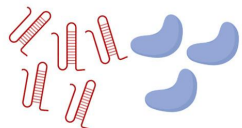
## B Editing Molecule Type



## C Reporting of cell quantity



## E 1) Quantity of gRNA to Cas9 2) Quantity of RNP to cells 3) Quantity of on-target sites per cell



concept	recommendation
editing formulation	<ul style="list-style-type: none"> <li>report the formulation type (plasmid, RNA, RNP, etc.)</li> <li>report any co-introduced reagents (HDR donor or fluorescent tracer)</li> </ul>
reagent source	<ul style="list-style-type: none"> <li>report the source for each reagent used</li> <li>from a donating lab: include citation to previous work where available</li> <li>commercially purchased: vendor and item number</li> <li>formulated in lab: details on how reagent was generated</li> </ul>
numerical values and units	<ul style="list-style-type: none"> <li>reporting molar amounts is recommended; this could be reported as the starting molarity and the volume used, or the final molarity in the editing formulation</li> <li>if reporting relative ratios (stoichiometry) of editing biomolecules</li> <li>report the molecule identity to which the ratio corresponds, for example, 1:1.4 Cas9:gRNA</li> <li>report numerical value and units of mass, concentration, and/or molarity for at least one component in the formulation so that the other component values can be calculated (see <a href="#">Figure 2D</a> for an example)</li> <li>if a plasmid is used, sufficient information should be provided to calculate the number of plasmid molecules in the formulation. This could be reported as follows               <ul style="list-style-type: none"> <li>molar amount of plasmid, for example, 100 nM plasmid</li> <li>mass amount of plasmid with nucleotide length, for example, 1 <math>\mu</math>g of plasmid, 8505 bp</li> <li>mass amount of plasmid with molecular weight (MW), for example, 1 <math>\mu</math>g of plasmid, <math>5.26 \times 10^6</math> g/mol</li> <li>mass amount of plasmid with sequence or reference by which a reader can calculate the nucleotide length or MW of the plasmid construct, for example, 1 <math>\mu</math>g of plasmid, Addgene #71814</li> </ul> </li> </ul>
cell quantity	<ul style="list-style-type: none"> <li>reporting the number of cells that were treated with editing formulation is recommended</li> <li>if reporting cell quantity in other units, sufficient information should be provided to obtain the cell number. This could be reported as follows               <ul style="list-style-type: none"> <li>cell concentration and volume, for example, 200 <math>\mu</math>L of <math>1 \times 10^6</math> cells/mL</li> <li>cells per well and plate dimensions, for example, <math>1 \times 10^5</math> cells/well in a six-well format (9.6 cm<sup>2</sup>)</li> <li>percent confluency and plate dimensions, for example, 70% confluency in a six-well format (9.6 cm<sup>2</sup>)</li> </ul> </li> </ul>
delivery method	<ul style="list-style-type: none"> <li>report the delivery system used (lipid encapsulation, microinjection, electroporation, etc.)</li> <li>report the source/vendor, instrument information, and the delivery parameters (include values and units)</li> </ul>
assessments	<ul style="list-style-type: none"> <li>separate the concepts of delivery, localization, and editing when designing, executing, and interpreting experimental results</li> <li>report the values and calculation used when describing a measure of performance (percent editing, delivery efficiency, etc.)</li> <li>report on the time point(s) at which measurements were made</li> </ul>

# Thank You NIST Colleagues!



Natasha  
Kolmakova



Alex Tona



Tara  
Eskandari



Sierra  
Miller



Simona  
Patange



Patty  
Kiesler



Ayah  
Shevchenko



Justin Zook



Nate Olson



Zach Trautt



Arlin Stoltzfus



Hua-Jun He



Jamie Almeida

NIST Genome  
Editing  
Consortium  
Members  
&  
Other external  
collaborators



# Standards Coordinating Body

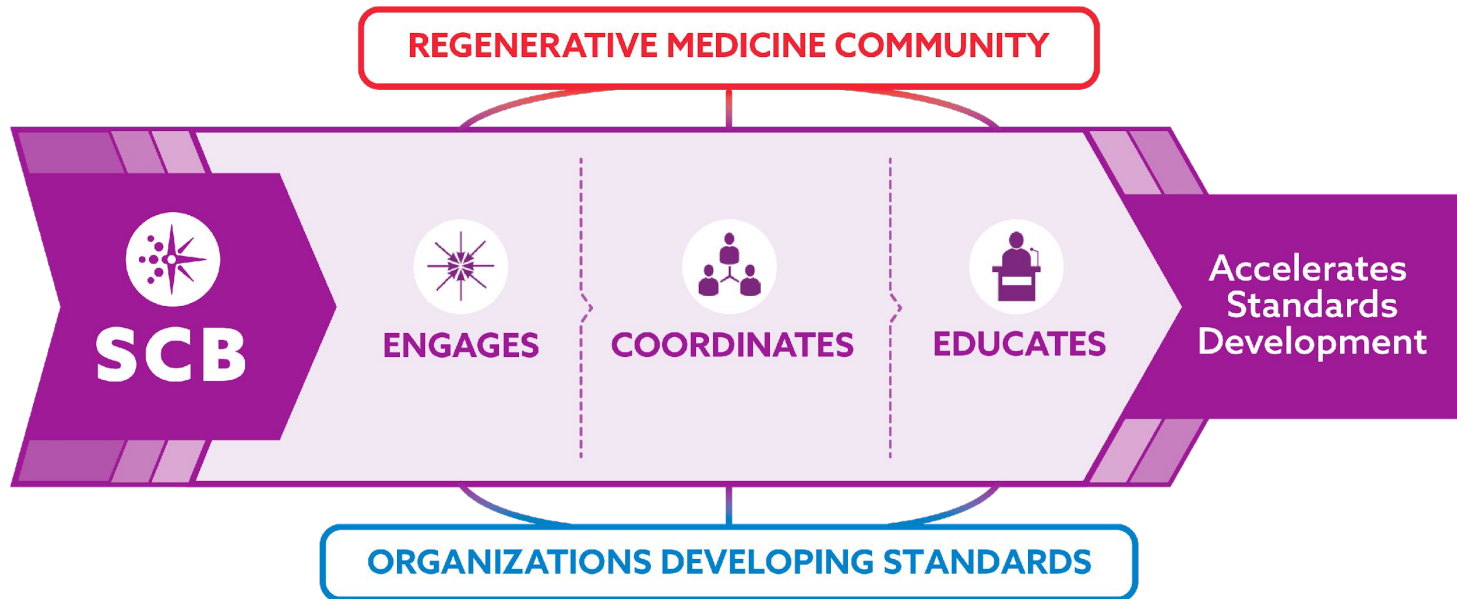
Dawn Henke

Senior Scientific Program Manager

November 16th, 2023  
Standards workshop



# Connecting the regenerative medicine community to standards development



Established in 2016 and launched in January 2017, SCB is an **independent 501(c)(3)** organization

Occupies unique niche within field with **no vested interests in specific scientific, commercial, clinical or policy approaches**

SCB is **not an SDO**, but rather **coordinates** the standards development process

Serves as **communication vehicle** among all stakeholders, including government agencies, critical to the development of standards

# SCB Bringing value to patients and the community

**MISSION:** Coordinate the accelerated advancement and improved awareness of standards and best practices that address the rapidly evolving needs of the global regenerative medicine advanced therapy community

**VISION:** Improve patient lives through the widespread use of standards that enhance the consistency, availability, efficacy, quality, and safety of regenerative medicine therapies



# Benefits of Standards





# Standards Recognition Program

# Regulations, Guidances, and Standards

## Regulations:

**Have the force and effect of law and are usually mandatory**, setting out specific requirements that regulated products and organizations must meet. In the United States, regulations are written in the Code of Federal Regulations and published in the Federal Register.

## Guidances:

Formal documents issued by a government agency **to clarify** the agency's **thinking on existing laws or regulations** and offer guidelines for how industry **can comply with these regulations**.

## Standards:

**Voluntary rules**, conditions, characteristics, or physical materials that an organization can adopt to make a process safer, more efficient, or better aligned with the practices of other organizations in their industry.

Different standards types include:

- **Documentary Standards**
- Standard Reference Material
- Standard Reference Data

# Regulatory perspective on standards

- Regulatory have clearly expressed the preference for the use of consensus based standards in the approval process when applicable

## **Voluntary Consensus Standards Recognition Program for Regenerative Medicine Therapies**

---

### **Guidance for Industry**

# Recognition program for Standards

- Finalized on Oct 20th
- Guidance outlines a program for the FDA to **vet and formally recognize standards** that are applicable to regulatory approval of regenerative medicine products
- Standards must apply to **regulatory approval for regenerative medicines** and be consensus
- Public can submit standards they believe fit criteria for vetting by the FDA
- The list of recognized standards is not available yet but will be shortly
- SCB plans to work with the FDA to develop a **webinar in January** to go into detail about this program and the standards that are recognized





# Standards Resources

# Regenerative medicine standards portal

The [SCB Regenerative Medicine Standards Portal](#) offers an easily searchable and filterable database of hundreds of regenerative medicine standards across 25+ organizations.

Custom search by

- Keywords
- Sector
- Functional area
- Standard organization
- + more

***Updated at least monthly to ensure accurate information on the entire regenerative medicine standards landscape.***



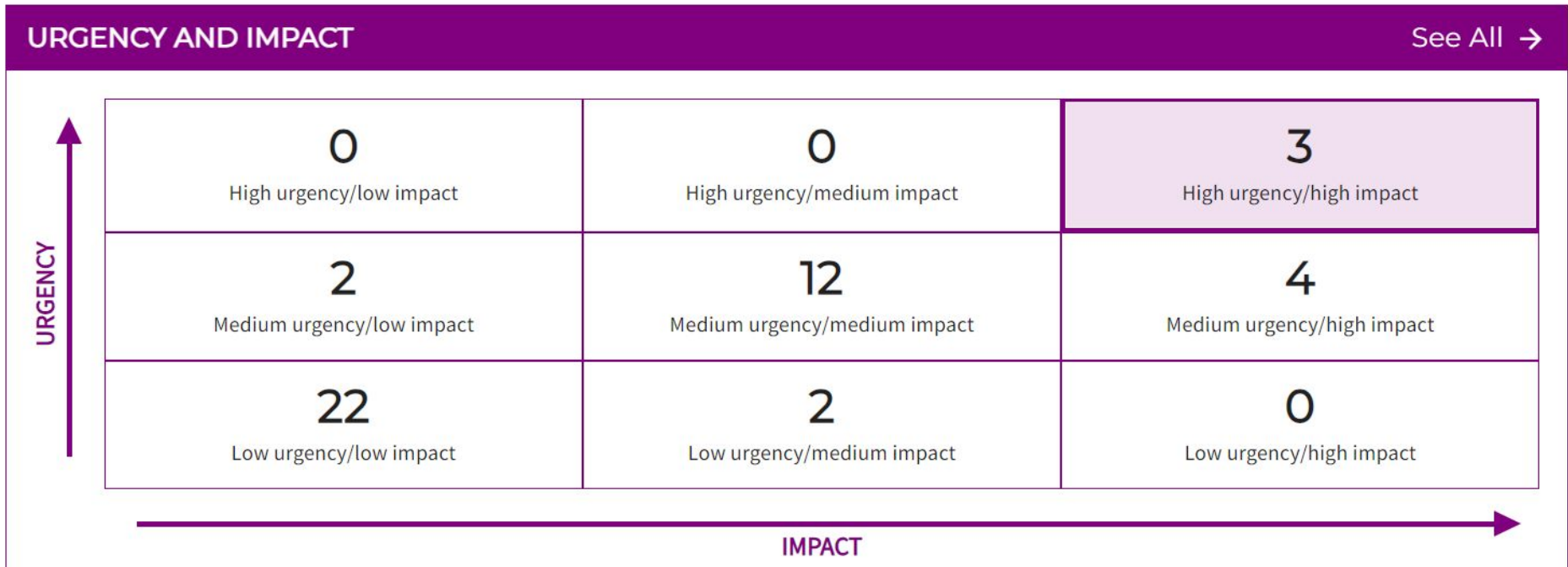
# Needed regenerative medicine standards

To provide feedback for the next update, please fill out the needed standards survey.

Based on the feedback, the chart below is updated semi-annually to reflect the community's prioritization perspectives.

TAKE THE SURVEY [↗](#)

Currently we are collecting responses for the update as part of the FDA contract. We will pull responses from the survey on 10/30



The needed standards survey can be found at: <https://www.standardscoordinatingbody.org/needsurvey>

# Open Ballots

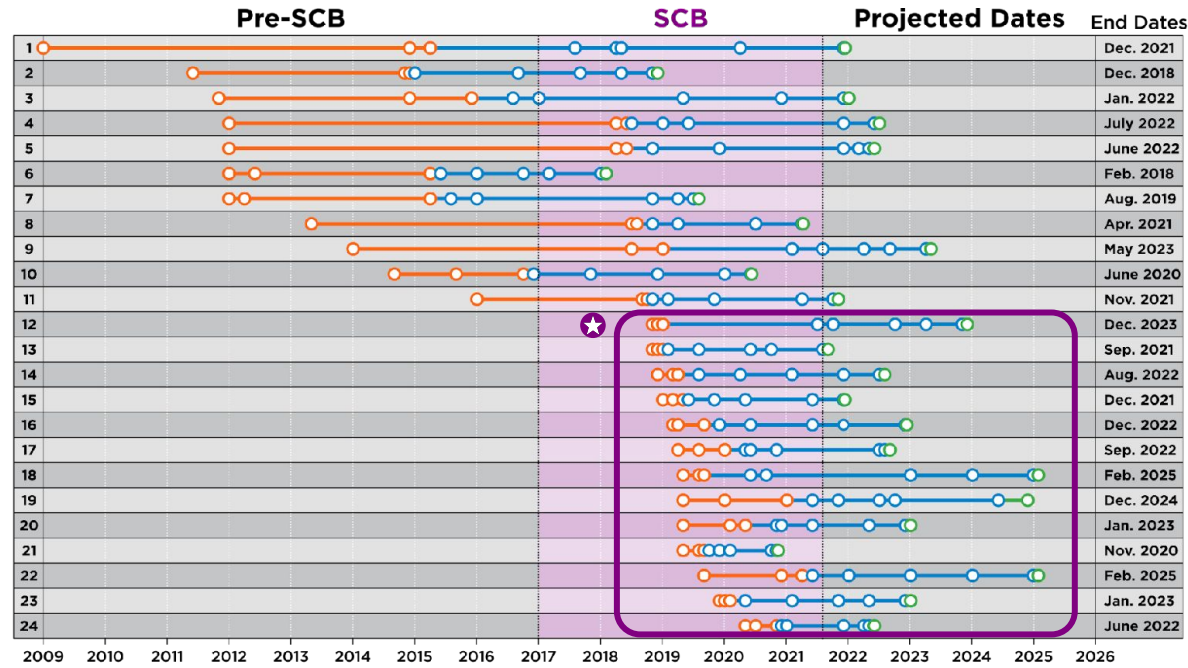
1. ISO/NP 23494-2 Biotechnology — Provenance information model for biological material and data — Part 2: Common Provenance Model  
Closing: 30-Nov-23
1. ISO 20387:2018 Biotechnology —5 Biobanking — General requirements for biobanking  
Closing: 2-Dec-23
1. [IG-050 Now Open for Public Comment](#) - ICCBBA implementation guide for Col identifier guidance  
Closing: Nov 20
1. Guide for Bioinks Used in Bioprinting WK74668 PDF (1144K)
1. ISO/PWI 21085 Biotechnology — General requirements for the measurement of ultra-low concentration samples of target nucleic acid sequences  
Closing: 07-Dec-23



# Standards Coordination

# SCB: accelerating standards advancement

★ SCB involvement has significantly reduced the time spent on upstream steps, allowing needs to be addressed more quickly.



1. Characterization of Human Cells for Therapeutic Use
  2. Ancillary Materials Used in Cellular Therapy Production (3-Part TS)
  3. Requirements for Cell Therapy Manufacturing Equipment
  4. Rapid Microbial Testing Method Design and Validation Framework
  5. Sampling Methods of Tissue Engineered Medical Products for Sterility Assurance
  6. General Guidance on Cell Counting Part 1
  7. General Guidance on Cell Counting Part 2
  8. Characterization of Fiber-Based Scaffolds
  9. Cell Collection Standards for Cell Therapies
  10. Transportation Requirements of Cells for Therapeutic Use
  11. BioInk Printability Test Method
  - ★ 12. Evaluating Pre-existing Immunity to Adeno-Associated Viruses
  13. Cryopreservation of Cells (PDA-led project)
  14. Bioprinter Hardware
  15. Ancillary Materials used in Cellular Therapy Production (IS)
  16. Bioprinter Software/Data Governance
  17. ASME Thermal Medicine Tissue Properties
  18. Base Requirements for Digital Platforms for Providers
  19. Viral Vectors (Lenti/AAV) for Gene Therapy
  20. Microphysiological Systems
  21. Base Labeling Requirements for Regenerative Medicine Products
  22. Cell Viability
  23. Tissue Engineering Lexicon
  24. Chain of Custody (COC)/Chain of Identity (COI)
- Key: ■ Prioritized for Coordination ■ Feasibility Reports ■ Both

\*\*Availability dates are estimates only. Development of a standard depends on SDO timelines, which can be time intensive and may vary significantly (particularly for reference materials).



# FDA/Nexight Standards Development for Regenerative Medicine Therapies Contract

**Timeframe:** 9/22/2022-9/21/2024  
(base year and 1 option year)

**Status:** Base Year approved and work began

**Description:** Accelerate and increase community engagement in the development of regenerative medicine standards

## Highlights:

- Conduct Workshop on feasibility topics:
  - Methods for the Evaluation of Endogenous T-Cell Therapies
  - Methods for Assessing Gene Therapy Product Activity and Comparability
  - Feasibility assessments planned for spring 2024
- Update the Needed Standards report Work with experts to coordinate high-priority standards efforts
  - Needed standards will be updated by the end of this month
- Integrate and maintain the landscape of standards in the standards portal
- Provide ongoing reporting of engagement with experts and experts' engagement with standards

# SCB Supported NIST Consortia

NIST RMTM Consortium			NIST Flow Cytometry Consortia		
<p><b>WG01 - Reference Materials</b></p> <p>First task is to design and produce a candidate reference material</p>	<p><b>WG02 - Methods and Validation</b></p> <p>Provide guidance on the selection and considerations for use of appropriate reference standard materials for the qualification and/or validation of rapid sterility methods for ATMP's</p>	<p><b>WG03 - Interlaboratory Studies</b></p> <p>Designing planning activities for Q2 and Q3; starting with a survey to gauge availability of laboratory resources, instrumentation, and materials</p>	<p><b>WG1 - ERF Bead Calibration and Instrument Standardization</b></p> <p>Advance the utility of ERF assigned beads for flow cytometry calibration.</p> <p>Study will compare the intensity values for unknown samples among instruments based on ERF bead calibrations.</p> <p>Reagents, beads, and SOP will be supplied through the Consortium</p>	<p><b>WG2 - Assay Standardization</b></p> <p>Cell Count and Health (e.g., viability, exhaustion, and apoptosis) is the first test case</p> <p>Study design include various assay control materials to enable comparability of assay results across different cytometer platforms.</p> <p>Study outputs include SOP, standard panels, assay control materials, and reference data</p>	<p><b>WG3</b></p> <p>Database creation and data analysis</p>



# Relevant Standards:

— Search Filters T cell × Reset all filters

Enter keywords  × Help with definitions ?

Use double quotes to search for an exact match ("F2233-22")

and/or

SECTOR	FUNCTIONAL AREA	ORGANIZATION	STATUS	TYPE
<input checked="" type="radio"/> All	<input checked="" type="radio"/> All	All <span>▼</span>	<input checked="" type="radio"/> All	<input checked="" type="radio"/> All
<input type="checkbox"/> Cell Therapy	<input type="checkbox"/> Bioprocessing and Production		<input type="checkbox"/> In Development	<input type="checkbox"/> Documentary
<input type="checkbox"/> Gene Therapy	<input type="checkbox"/> Analytical and Testing Methodologies		<input type="checkbox"/> Published / Released	<input type="checkbox"/> Reference
<input type="checkbox"/> Tissue Engineering	<input type="checkbox"/> Product Quality and Characterization		<input type="checkbox"/> Withdrawn	
<input type="checkbox"/> Supportive	<input type="checkbox"/> Logistics and Compliance Criteria		<input type="checkbox"/> Area of Need	
	<input type="checkbox"/> Preclinical Studies			
	<input type="checkbox"/> Clinical Trials			

SEARCH RESULTS		<input type="checkbox"/> SHOW ONLY ANSI PACKAGES	EXPORT RESULTS
<b>232</b> STANDARDS	<b>22</b> ORGANIZATIONS	<b>168</b> PUBLISHED / RELEASED	<b>46</b> IN DEVELOPMENT
			<b>50</b> AREAS OF NEED

# Relevant Standards:

Note: This portal searches on standards titles and summary descriptions, not within the full text of the standard itself.




— Search Filters **Gene Therapy** ✕ Reset all filters

Help with definitions ?








Use double quotes to search for an exact match ("F2233-22") and/or

SECTOR	FUNCTIONAL AREA	ORGANIZATION	STATUS	TYPE
<input type="radio"/> All	<input checked="" type="radio"/> All	All <span>▾</span>	<input checked="" type="radio"/> All	<input checked="" type="radio"/> All
<input type="checkbox"/> Cell Therapy	<input type="checkbox"/> Bioprocessing and Production		<input type="checkbox"/> In Development	<input type="checkbox"/> Documentary
<input checked="" type="checkbox"/> Gene Therapy	<input type="checkbox"/> Analytical and Testing Methodologies		<input type="checkbox"/> Published / Released	<input type="checkbox"/> Reference
<input type="checkbox"/> Tissue Engineering	<input type="checkbox"/> Product Quality and Characterization		<input type="checkbox"/> Withdrawn	
<input type="checkbox"/> Supportive	<input type="checkbox"/> Logistics and Compliance Criteria		<input type="checkbox"/> Area of Need	
	<input type="checkbox"/> Preclinical Studies			
	<input type="checkbox"/> Clinical Trials			



**SEARCH RESULTS**  SHOW ONLY ANSI PACKAGES



 <b>111</b> STANDARDS	 <b>12</b> ORGANIZATIONS	 <b>74</b> PUBLISHED / RELEASED	 <b>36</b> IN DEVELOPMENT	 <b>40</b> AREAS OF NEED
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# ISO Evaluation of Quantification for Nucleic Acids

	International Organization for Standardization — ISO		ISO 20395:2019	Biotechnology — Requirements for evaluating the performance of quantification methods for nucleic acid target sequences — qPCR and dPCR	Published 2019	Documentary
<b>Applicable Sector(s)</b>	 Gene Therapy					
<b>Functional Area(s)</b>	 Analytical and Testing Methodologies  Product Quality and Characterization					
<b>Description</b>	This document describes the quality, reliability, and reproducibility of targeted nucleic acid quantification measurements employed in bioproduct development and characterization and in bioprocesses, supporting the regulatory-driven requirements of the biotechnology industry.					
<b>Additional Keywords</b>	quantification of DNA, deoxyribonucleic acid, RNA, ribonucleic acid, target sequences, digital, dPCR, quantitative real-time PCR, qPCR amplification technologies					
<b>Availability</b>	<a href="https://www.iso.org/standard/67893.html">https://www.iso.org/standard/67893.html</a>					
<b>Curated ANSI Package(s)</b>	<a href="#">Tissue Engineering Standards Addressing Analytical and Testing Methodologies Package</a>					
 Feedback or updates on this item  Export						

# ISO Cell Characterization

International Organization for Standardization – ISO	ISO 23033:2021	Biotechnology – Analytical methods – General requirements and considerations for the testing and characterization of cellular therapeutic products	Published 2021	Documentary
<b>Applicable Sector(s)</b>	 Cell Therapy			
<b>Functional Area(s)</b>	 Analytical and Testing Methodologies			
<b>Description</b>	<p>This standard defines terms related to characterization of human cells for therapeutic applications. It also provides a general description of cell characteristics and common cell measurement methods. This document defines terms and provides general requirements for the testing of cellular therapeutic products intended for human use.</p> <p>This document also provides considerations for the characterization and testing of cellular therapeutic products, including approaches to select and design analytical methods that are fit-for purpose and considerations for setting specifications for the analytical methods. Such considerations can be used to establish critical quality attributes (CQAs) for a cellular therapeutic product.</p> <p>Aspects of this document are applicable to starting materials (including those for tissue-engineered products) and intermediates of cellular therapeutic products. This document excludes tissues used in transplantation.</p>			
<b>Additional Keywords</b>	Biotechnology, analytical methods, testing and characterization of cellular therapeutic products			
<b>Updates and Calls to Action</b>	This standard has been published ( <a href="#">SCB-coordinated project</a> ).			
<b>Availability</b>	<a href="https://www.iso.org/standard/74367.html">https://www.iso.org/standard/74367.html</a>			

 Feedback or updates on this item     Export

# ISO Optical Measurements

**ISO 24421:2023 Biotechnology Minimum requirements for optical signal measurements in photometric methods for biological samples**

<https://www.iso.org/standard/78742.html?browse=tc>

## 1 Scope

This document specifies minimum requirements to support accurate measurement of optical signals in photometric methods used for qualitative or quantitative characterization of biological samples.

This document is applicable to optical signals that are generated, for example, by bioluminescence, chemiluminescence and fluorescence, and optical signals that are detected as changes of light due to absorption.






This document addresses the verification of optical signal measurement instruments used in photometric methods for measurement of biological samples including considerations for the use of optical references.

This document does not provide sector- or application-specific performance criteria for the workflow of measuring biological samples. When applicable, users can also consult existing sector- or application- specific standards, or both.

# ASTM quantitative fluorescence measurements

ASTM International	ASTM F3294-18	Standard Guide for Performing Quantitative Fluorescence Intensity Measurements in Cell-based Assays with Widefield Epifluorescence Microscopy	Published 2018	Documentary
Applicable Sector(s)	<span>Cell Therapy</span> <span>Tissue Engineering</span>			
Functional Area(s)	<span>Bioprocessing and Production</span> <span>Analytical and Testing Methodologies</span> <span>Product Quality and Characterization</span>			
Description	<p>Relative intensity measurements made by widefield epifluorescence microscopy are used as part of cell-based assays to quantify attributes such as the abundance of probe molecules (see ASTM F2997), fluorescently labeled antibodies, or fluorescence protein reporter molecules. The general procedure for quantifying relative intensities is to acquire digital images, then to perform image analysis to segment objects and compute intensities. The raw digital images acquired by epifluorescence microscopy are not typically amenable to relative intensity quantification. This guide offers a checklist of potential sources of bias that are often present in fluorescent microscopy images and suggests approaches for storing and normalizing raw image data to assure that computations are unbiased.</p> <p>Widefield fluorescence microscopy is frequently used to measure the location and abundance of fluorescent probe molecules within or between cells. In instances where Random Illumination Microscopy (RIM) comparisons are made between a region of interest (ROI) and another ROI, accurate normalization procedures are essential to the measurement process to minimize biased results. Example use cases where this guidance document may be applicable include:</p> <ul style="list-style-type: none"><li>• Characterization of cell cycle distribution by quantifying the abundance of DNA in individual cells</li><li>• Measuring the area of positively stained mineralized deposits in cell cultures (ASTM F2997)</li><li>• Quantifying the spread area of fixed cells (ASTM F2998)</li><li>• Determining DNA damage in eukaryotic cells using the comet assay (ASTM E2186)</li><li>• The quantitation of a secondary fluorescent marker that provides information related to the genotype, phenotype, biological activity, or biochemical features of a colony or cell (ASTM F2944)</li></ul> <p>This guidance document was developed to facilitate the collection of microscopy images with an epifluorescence microscope allowing quantitative fluorescence measurements to be extracted from the images. The document is tailored to cell biologists who often use fluorescent staining techniques to visualize components of a cell-based experimental system. Quantitative comparison of the intensity data available in these images is only possible if the images are quantitative based on sound experimental design and appropriate operation of the digital array detector, such as a charge coupled device (CCD) or a scientific complementary metal oxide semiconductor (sCMOS) or similar camera. The document considers issues involving the array detector and controller software settings, including collection of dark count images to estimate the offset, flat-field correction, background correction, benchmarking of the excitation lamp, and the fluorescent collection optics.</p> <p>This document was developed around epifluorescence microscopy but may also be applicable to quantitative imaging in other fluorescence microscopy systems such as fluorescence confocal microscopy. This guide was developed around single-color fluorescence microscopy imaging or multi-color imaging where the measured fluorescence is spectrally well separated. This document also discusses metrology issues related to relative measurements and experimental designs that may be required to ensure quantitative fluorescence measurements are comparable after changing microscope, sample, and lamp configurations.</p>			
Additional Keywords	Chemical Analysis, Imaging Technology, Microscopy, Optical Properties, Semiconductor Devices			
Availability	<a href="https://www.astm.org/Standards/F3294.htm">https://www.astm.org/Standards/F3294.htm</a>			
Curated ANSI Package(s)	<a href="#">Tissue Engineering Standards Addressing Product Quality and Characterization Package</a> <a href="#">Cell Therapy Standards Addressing Product Quality And Characterization Package</a> <a href="#">Tissue Engineering Standards Addressing Analytical and Testing Methodologies Package</a>			
			<a href="#">Feedback or updates on this item</a>	<a href="#">Export</a>

# ASTM Osteoblast differentiation

—	ASTM International	✓	ASTM F3106-22	Standard Guide for in vitro Osteoblast Differentiation Assays	Published 2022	Documentary
Applicable Sector(s)	 Cell Therapy	 Tissue Engineering				
Functional Area(s)	 Product Quality and Characterization					
Description	This document describes the components and conditions used for in vitro osteoblast differentiation assays used to screen for the osteogenic capability of progenitor stem cells from various human or animal sources. These sources include mixed tissue-derived connective tissue progenitor populations and cell populations that may be selectively isolated or manipulated through culture expansion, processing, transfection, or genetic modification.					
Additional Keywords	Biological Test, Biomaterials, Bone Mineralization, Cell Culture, Cells, Cultivation, Forensic Anthropology, In Vitro Bioassay, Mesenchymal Stem Cells, Osteoblasts, Progenitor Cells					
Availability	<a href="https://www.astm.org/Standards/F3106.htm">https://www.astm.org/Standards/F3106.htm</a>					
Curated ANSI Package(s)	<a href="#">Tissue Engineering Standards Addressing Product Quality and Characterization Package</a> <a href="#">Cell Therapy Standards Addressing Product Quality And Characterization Package</a>					
					 Feedback or updates on this item	 Export

# Standards projects: Cell Therapy & crosscutting

- **ISO Ancillary Materials:** Published
- **ISO certificate of analysis:** currently drafting. Submitting initial comment period in early Nov
- **Framework for cryopreservation:** currently drafting. Submitting initial comment period in early Nov
- **ISO RMTM Framework:** Published
- **ISO Cell Viability:** Current draft is available for review
- **ISO Minimum Requirements for Cellular Morphological Analysis — Image capture, image processing, and morphometry.** At DIS stage.
- **ISO cell line authentication:** Published

## Cell Therapy\* Sector

Assess potential standards that could improve the safety, quality, and efficacy of cell therapy products and enable more efficient product development processes, such as by establishing common methods to measure cells' functional response to their environment.

\* Cell therapy products use living cells as a means of replacing or repairing damaged cells to treat disease.



# Standards projects: Gene Therapy

- **Pre-Existing Immunity to AAV:** Actively drafting. Preparing for NP ballot.
- **Validation of database used for nucleotide sequence evaluation:** At DIS stage
- **ISO Nucleic Acid Synthesis — Part 2: General definitions and requirements for the production and quality control of synthesized gene fragment, gene, and genomes:** Final stages before publication
- **ISO Massively parallel sequencing — Part 1: Nucleic acid and library preparation.** Published
- **ISO Gene delivery systems — Part 1, 2, and 3 – Passed NP Ballot, Looking for SMEs for comment**

## Gene Therapy\* Sector

Evaluate the potential for standards that can help improve the safety and efficacy of gene therapy treatments, such as by improving screening for pre-existing immunity to common viral vectors.

\* Gene therapy involves the use of a vector, such as an inactivated virus, to insert a new copy of a gene or relevant nucleotide sequence into a patient's cells to treat a genetic health condition.



# Opportunities to Impact Standards Development and Implementation

# ISO/TC 276 Biotechnology Meetings

**WG2 Biobanking:** Nov 13th, Nov 14th, Nov 15th, Nov 16th

**WG 3 Analytical Methods:** Dec 6th, Dec 7th, Dec 8th

**WG 4 Bioprocessing:** Nov 28th, Dec 4th, Dec 5th

**WG 5 Data processing and integration:** Dec 4th, Dec 5th, Dec 6th, Dec 7th, Dec 8th

If interested in joining a working group, please contact Dawn at [DHenke@regenmedscb.org](mailto:DHenke@regenmedscb.org).

# Call to Action

- **\*ISO Cell Viability Project**
- **ASTM WK70143, New Guide for Sampling Methods of Tissue Engineered Medical Products (TEMPs) for Sterility Assurance**
- **Cryopreservation Framework**
- **Containers for Cryopreservation**
- **Certificate of Analysis for Ancillary Material**

If interested in joining a working group, please contact Dawn at [DHenke@regenmedscb.org](mailto:DHenke@regenmedscb.org).



# Education Updates

# Workforce Development Course Update

## Pilot training program for standards:

Began to design and implement a pilot training program (with ARMI | BioFab USA) to help manufacturers to avoid/minimize many of the common front-end issues of the manufacturing process.

**ISO Cell Counting Part 1&2:** We've recently signed an MOU for training partnership with ISCT: The SCB certificate course will be offered through ISCT's LMS. The course should be available online through ISCT very soon.

**ISO Ancillary Materials:** we are still recruiting experts to help with the creation of course content.

If interested in serving as a subject matter expert or to contribute case studies, please contact Katie at [CZander@regenmedscb.org](mailto:CZander@regenmedscb.org).

# Focus Areas

Since our inception in 2017, SCB has accelerated the advancement of 34+ standards. But we need additional community support to respond to the interrelated challenges facing the regenerative medicine field. To address this need we have developed SCB Focus Areas.

The first three Focus Areas are:

1. Standards Implementation Education and Workforce Development
2. Data Management
3. Cryopreservation

Donor Benefits Include:

- SCB's formal recognition of your contribution in meetings and media
- A seat on the Focus Area's Steering Committee
- Discounted course registration for your employees

# Focus Areas

If interested in learning more about SCB Focus Areas, please contact Justin at [JBarch@regenmedscb.org](mailto:JBarch@regenmedscb.org).

## Standards Implementation Education and Workforce Development

**KEY CHALLENGE:**  
Standards can only benefit the community if there is broad understanding of how to implement them to meet regulatory expectations.

**FOCUS AREA SOLUTIONS:**  
Develop courses on how to use specific regenerative medicine standards to demonstrate regulatory compliance and improve the efficiency and repeatability of internal processes.

## Data Management

**KEY CHALLENGE:**  
Variability in data management practices and manufacturer requirements are common pain points for collection centers and can even overburden staff to the point of limiting their capacity to support clinical trials of potentially lifesaving therapies.

**FOCUS AREA SOLUTIONS:**  
Identify common data needs and approaches to streamline data management practices.



# Stay up to date on standards

Follow us on social media to stay up to date on news surrounding regenerative medicine standards, including webinars, FDA guidance documents, NIST consortium opportunities, open ballots, and new working groups.



**LinkedIn:** <https://www.linkedin.com/company/standards-coordinating-body>



**Twitter:** <https://twitter.com/SCBRegenMed>



**FOR MORE INFORMATION VISIT**  
**[www.standardscoordinatingbody.org](http://www.standardscoordinatingbody.org)**

**OR CONTACT [dhenke@regenmedscb.org](mailto:dhenke@regenmedscb.org)**



**Breakout Groups**  
(will be opening these  
breakout groups to virtual  
participation)

# Identification and Prioritization of Needed Standards

One of the main goals of SCB is to identify and prioritize needed standards to determine where resources should be allocated

SCB focuses on determining:

- What standards will be most beneficial for the community
- What standards will have the most impact
- What standards will help the therapy development process and get therapies to patients faster
- What standards will make therapies safer and more effective

# Feasibility Assessments

The next stage is assessing feasibility of developing identified standards

SCB organizes feasibility assessment meetings for a selection of high-priority standards identified by the community in the [Regenerative Medicine Standards Portal](#). These meetings bring together regenerative medicine stakeholders with diverse expertise and viewpoints to consider feasibility factors such as:

**Technical feasibility:** Whether an adequate technical and scientific foundation exists for constructing the standard

**Implementation feasibility:** Factors that influence an individual firm's adoption of the standard such as incurred costs; the standard's compatibility with existing equipment, materials, and technology; and required in-house expertise

**Expert availability:** Level of interest from technical experts in the field who can advance the standard

The results **inform SCB's standards priorities and often spur the creation of new working groups** for any standards or pre-standards outputs selected to move forward.

# Breakout Groups

Today we want to use two separate breakout sessions to identify and prioritize needed standards for

A) Assessing Gene Therapy Product Activity

B) Assessing T-Cell and Other Cell Therapy Product Activity

We are looking to determine what standards need to be created to move the regenerative medicine field forward.

# Breakout Group Goals

Day1:

Identify and prioritize specific standards needs and topics that are ripe for standardization for cell and gene therapy activity

Day 2:

Define more of the specifics of the standard topics identified on Day 1 and their feasibility

# Focus Questions

What assays or related processes, if standardized, would help address current challenges? Standards can include specific protocols about how to conduct a process (e.g., a technical specification or validation protocol) as well as less prescriptive guides that aid in decision making.

Which two topics would have the greatest positive impact on the field if standardized in the near term? (voting exercise)

For the top 2 prioritized topics:

- What components of the assay or related process need standardization (e.g., test selection, measurement methods, interpreting results, validation)?
- What key questions should be answered by a standard on this topic?
- Do you anticipate any barriers to standardizing these assays (e.g., lack of scientific consensus, difficulty or expense of implementation, potential resistance from the community)?





Day 1

# Breakout Instructions

# Breakout Instructions

- You will break out into two groups to participate in a facilitated discussion of standards needs.
- Please bring your laptops, as this will make it easier to submit input via XLeap
- Virtual participants are welcome to join the breakout sessions and submit comments via Webex chat or XLeap; however, the focus will be on the in-person meeting

## Gene Therapy Breakout Group

**Facilitator:** Dawn Henke

**Room:** Spaulding

**Meeting Link:** <https://uspevents.webex.com/uspevents/j.php?MTID=md10004a2621f9cb0e66ea28fa68fe32b>

**XLeap Link:** <https://39049718.xleap.net/gene>

## T-Cell and Other Cell Therapies Breakout Group

**Facilitator:** Sarah Lichtner

**Room:** Bache & Wood

**Meeting Link:**  
<https://uspevents.webex.com/uspevents/j.php?MTID=mcc9a0eabb2b516b90c15526242a2972f>

**XLeap Link:** <https://00689413.xleap.net/cell>



Day 2

# Breakout Instructions

# Breakout Instructions

- You will break out into two groups to participate in a facilitated discussion of standards needs.
- Please bring your laptops, as this will make it easier to submit input via XLeap
- Virtual participants are welcome to join the breakout sessions and submit comments via Webex chat or XLeap; however, the focus will be on the in-person meeting

## Gene Therapy Breakout Group

**Facilitator:** Dawn Henke

**Room:** Spaulding

**Meeting Link:**

<https://uspevents.webex.com/uspevents/j.php?MTID=mf5650bce7f8d2321b56240803733a9ff>

**XLeap Link:** <https://39049718.xleap.net/gene>

## T-Cell and Other Cell Therapies Breakout Group

**Facilitator:** Sarah Lichtner

**Room:** Bache & Wood

**Meeting Link:**

<https://uspevents.webex.com/uspevents/j.php?MTID=m8844776ad851f3432b905f5a6dce21b8>

**XLeap Link:** <https://00689413.xleap.net/cell>



# Gene Therapy Breakout

# XLeap

- 1 Click on the navigator icon in the upper left to view the open discussion spaces.
- 2 Click on the discussion title to enter the space.
- 3 Type in and post your idea in the "Your idea box" at the bottom of the screen.
- 4 Click on the speech bubble icon on the right of an idea to open the comment panel.
- 5 Type in and post your comment in the "Your comment" box.

Please join XLeap using a laptop, tablet, or smart phone using the following link:

<https://39049718.xleap.net/gene>



The image shows five numbered steps illustrating the XLeap interface:

1. A blue header bar with a white box containing a navigator icon and the text "Navigator".
2. A green-bordered box containing a lightbulb icon and the text "What assays or related processes, if standardized, would help address current challenges?".
3. A purple-bordered box containing a text input field with the placeholder "Your idea here" and a blue "POST" button.
4. A red-bordered box containing a comment input field with the text "1. This is a sample response." and a speech bubble icon on the right.
5. A grey-bordered box containing a comment input field with the placeholder "Your comment" and a blue "POST" button. Below the input field, it says "Contributions are anonymous".



# T-Cell Therapy Breakout

# XLeap

- 1 Click on the navigator icon in the upper left to view the open discussion spaces.
- 2 Click on the discussion title to enter the space.
- 3 Type in and post your idea in the "Your idea box" at the bottom of the screen.
- 4 Click on the speech bubble icon on the right of an idea to open the comment panel.
- 5 Type in and post your comment in the "Your comment" box.

Please join XLeap using a laptop, tablet, or smart phone using the following link:

<https://00689413.xleap.net/cell>



1



2



3



4



5





# NAVIGATING REGULATORY MILESTONES THROUGHOUT DEVELOPMENT

NOVEMBER 17, 2023

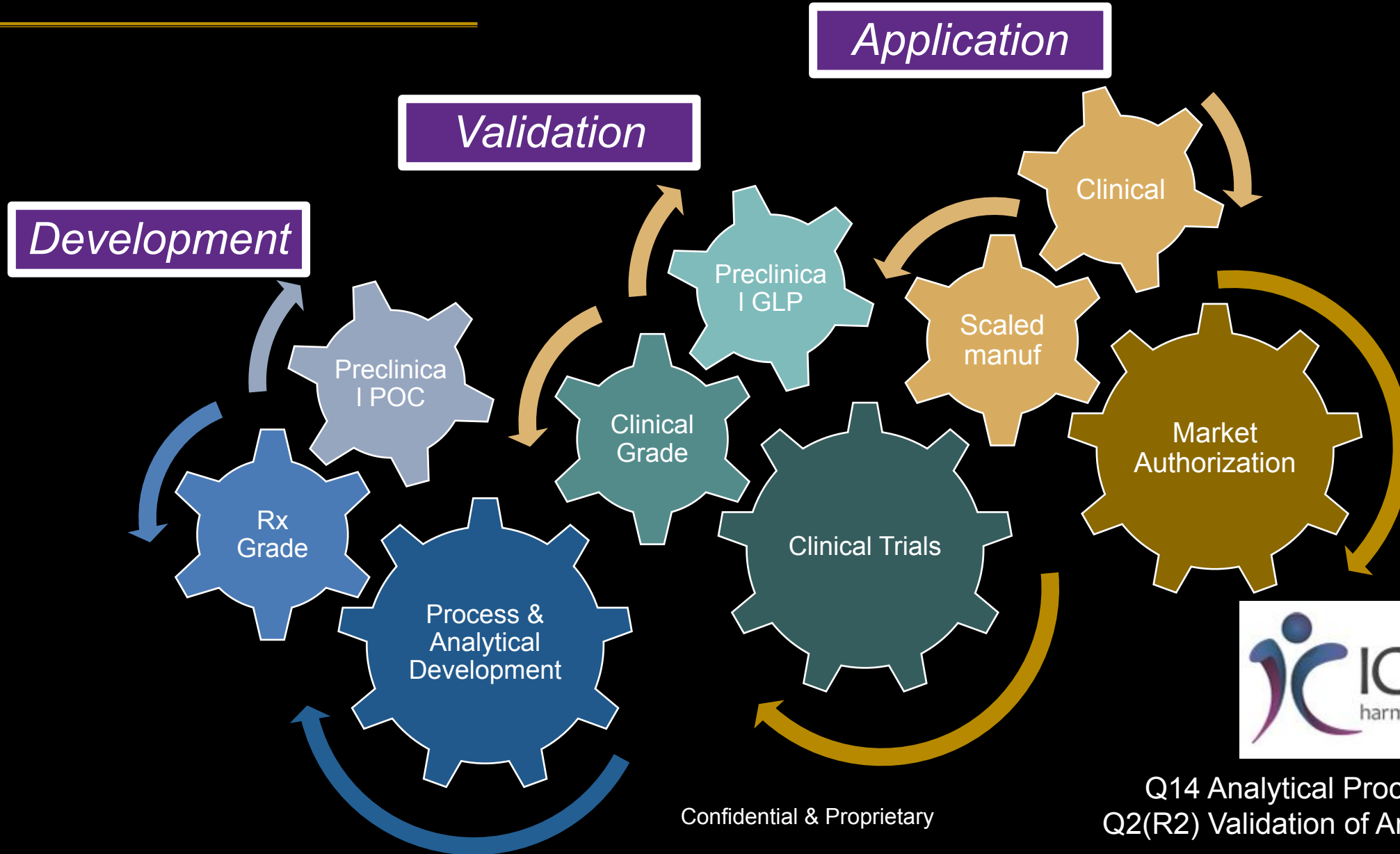
Workshop for the Identification and  
Standardization of Methods for Assessing Gene  
Therapy Product Activity and Comparability and  
the Evaluation of T-Cell Therapies



Patrick Bedford  
weCANtranslate Network

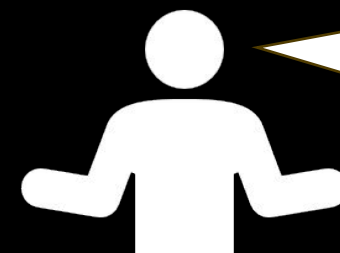


# ANALYTICS THROUGHOUT DEVELOPMENT



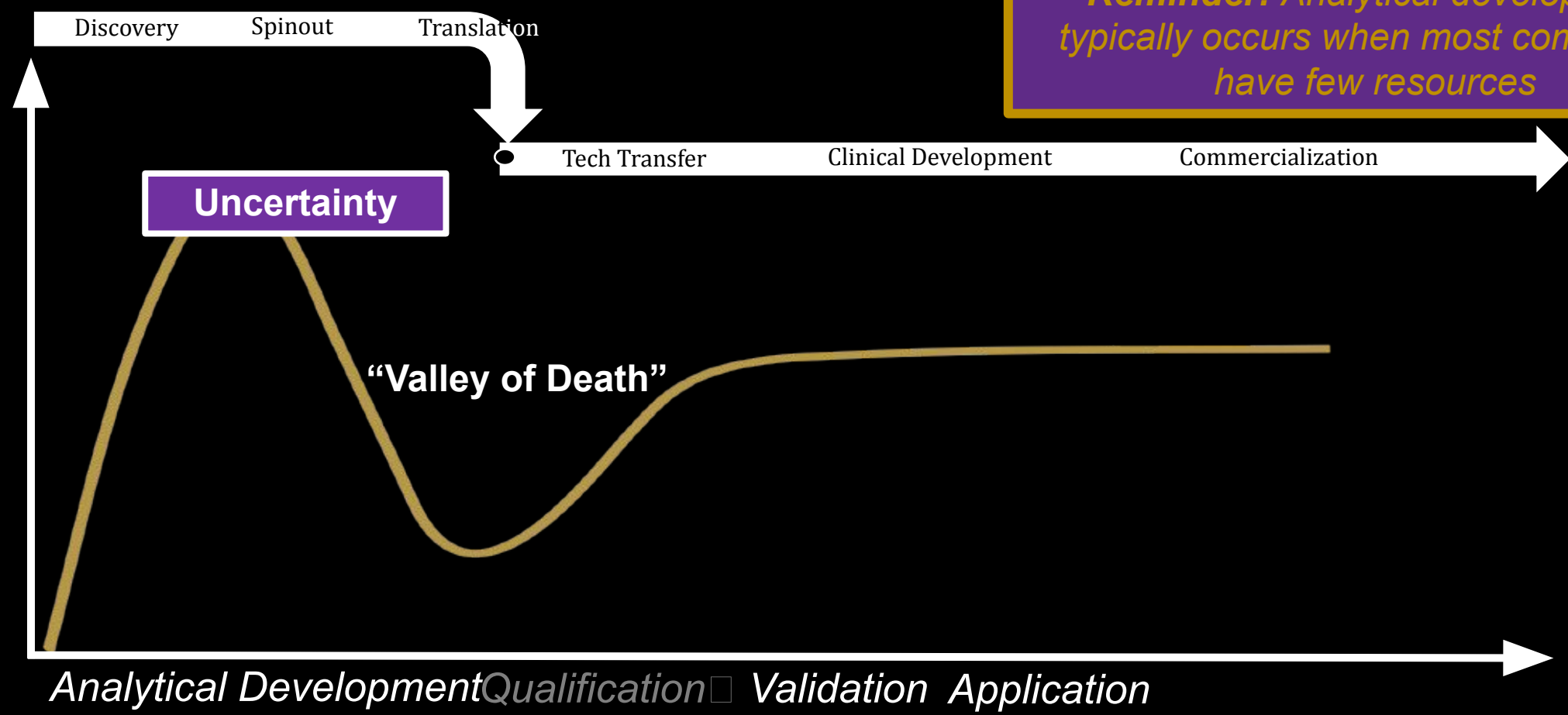


# OBSERVED CHALLENGES OVER TIME



should I invest in THIS

*Reminder: Analytical development typically occurs when most companies have few resources*



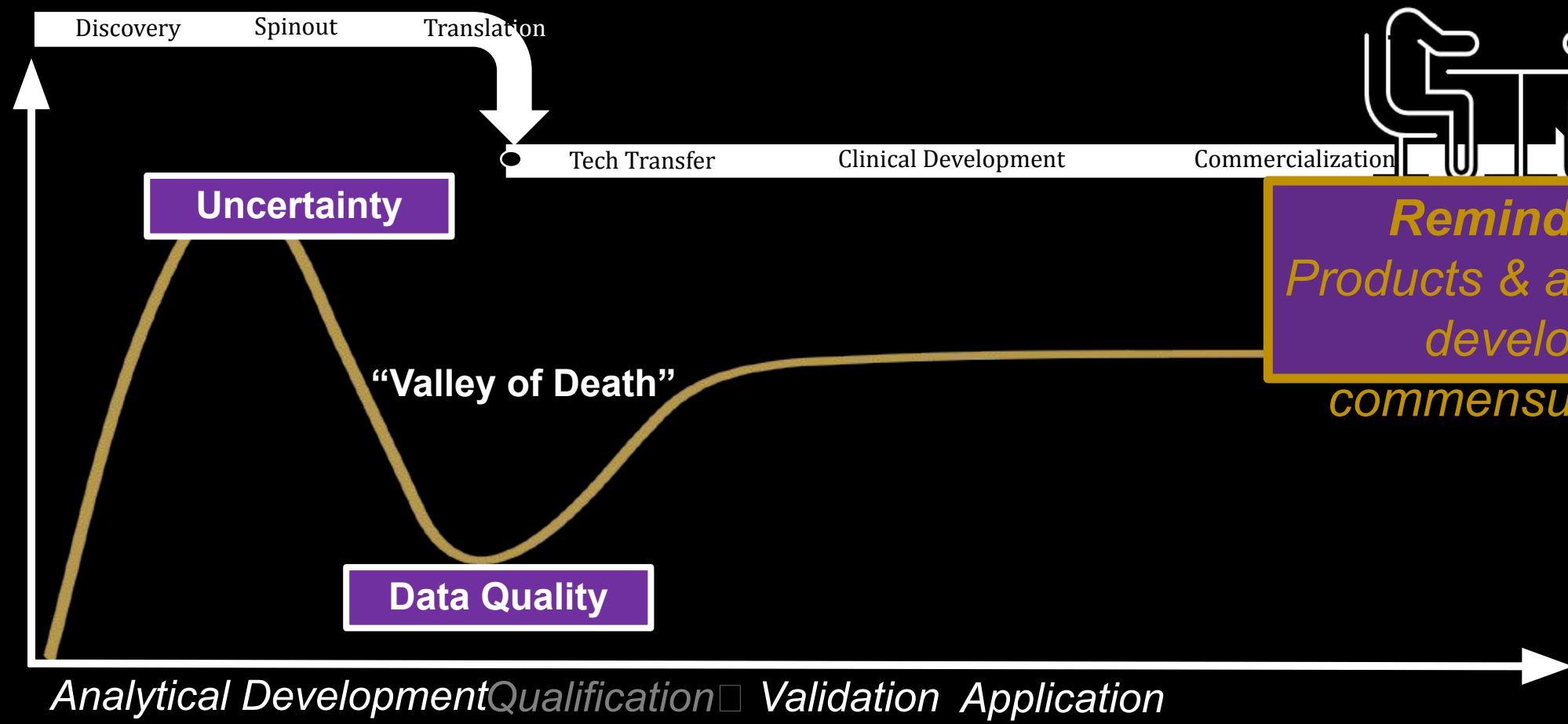
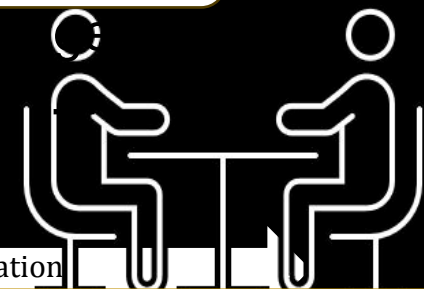
*Analytical Development*  *Qualification*  *Validation*  *Application*



# OBSERVED CHALLENGES OVER TIME

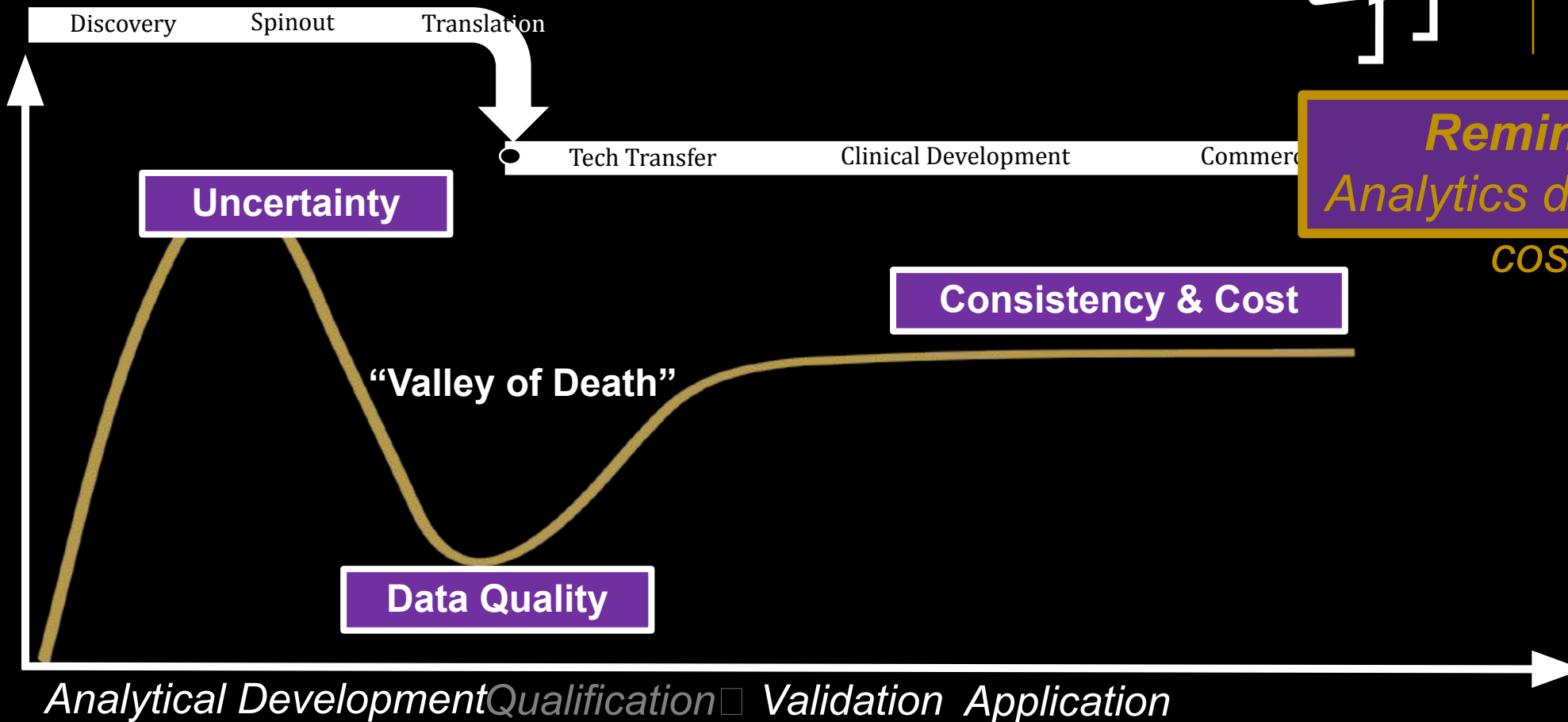
assays  
 need to be  
 preliminary  
 y  
 evidence

well, that  
 depends...  
 What are





# OBSERVED CHALLENGES OVER TIME



that assay when we have more money?



more cost-effective



**Reminder:**  
*Analytics drive CGT costs*



# MULTIPLE INTERRELATED PLAYERS

---

## SDOs, Associations & Consultants

Provide expert  
knowledge &  
experience



**Advisor**

**S**

**Sponsors**

## CDMOs and/or GMP facilities

Off-the-shelf &  
custom develop analytics

## Regulators

Provide guidance &  
assess sufficiency

---

Enabling a Healthier World

**Lonza**  
Cell & Gene

# Navigating the milestones in developing a commercially-viable CGT Product

A CDMO perspective on the analytical methods for T-cell products

Krishna Panchalingam | Associate Director, CGT Technical Operations/Development Services

SCB Gene Therapy Product & Comparability & The Evaluation of T-Cells Workshop  
November 17, 2023



**Lonza Group Ltd is headquartered in Basel, Switzerland and listed on the SIX Swiss Exchange. It has a secondary listing on the Singapore Exchange Securities Trading Limited ("SGX-ST"). Lonza Group Ltd is not subject to the SGX-ST's continuing listing requirements but remains subject to Rules 217 and 751 of the SGX-ST Listing Manual.**

Forward-looking statements contained herein are qualified in their entirety as there are certain factors that could cause results to differ materially from those anticipated. Any statements contained herein that are not statements of historical fact (including statements containing the words "outlook," "guidance," "believes," "plans," "anticipates," "expects," "estimates" and similar expressions) should be considered to be forward-looking statements. Investors are cautioned that all forward-looking statements involve risk and uncertainty.

There are a number of important factors that could cause actual results or events to differ materially from those indicated by such forward-looking statements, including the timing and strength of new product offerings; pricing strategies of competitors; the company's ability to continue to receive adequate products from its vendors on acceptable terms, or at all, and to continue to obtain sufficient financing to meet

its liquidity needs; difficulty maintaining relationships with employees, customers and other business partners; and changes in the political, social and regulatory framework in which the company operates, or in economic or technological trends or conditions, including currency fluctuations, inflation and consumer confidence, on a global, regional or national basis.

In particular, the assumptions underlying the section "Looking to the Future" herein may not prove to be correct. The statements in the section "Looking to the Future" constitute forward-looking statements and are not guarantees of future financial performance.

Lonza's actual results of operations could deviate materially from those set forth in the section "Looking to the Future" as a result of the factors described above or other factors. Investors should not place undue reliance on the statements in the section "Looking to the Future". Except as otherwise required by law, Lonza disclaims any intention or obligation to update any forward-looking statements as a result of developments subsequent to the publication of this presentation.



# Cell and Gene Therapies Come With Specific Challenges

Compared to traditional biologics

**Lonza**

Cell & Gene



## Accelerated timelines

Expedited approval pathways lead to reduced development times



## Scaling up & out

CGT manufacture is complex and cannot be ramped up linearly



## Cost of development & manufacturing

COGs can range between \$500K and \$1 million, excluding R&D costs



## Product quality & defining CQA

A process without fully developed CQAs and analytical methods does not provide any control. Thus, analytics are a critical part of process development.



## Analytical methods development



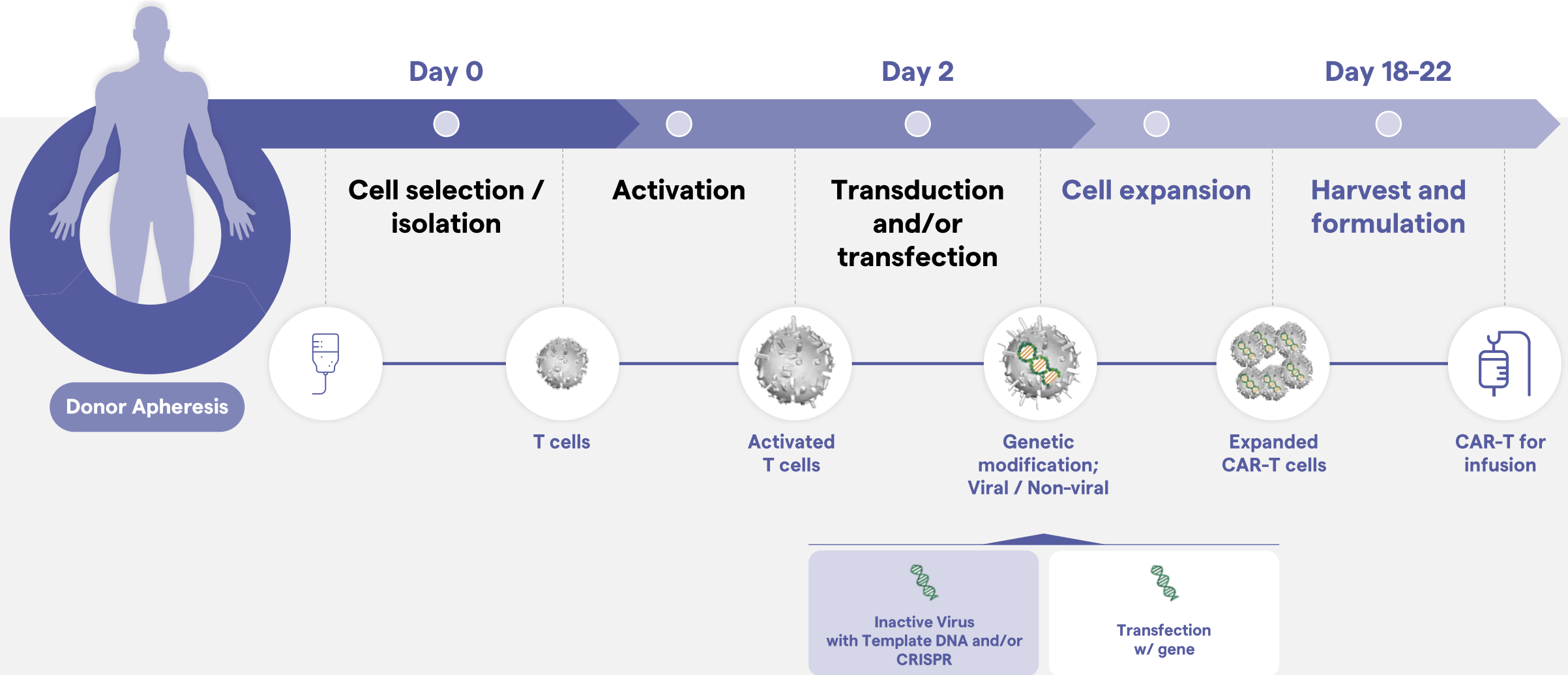
## Navigating the regulatory landscape

Evolving regulations and a lack of harmonization between health authorities

# Key challenges: Analytics

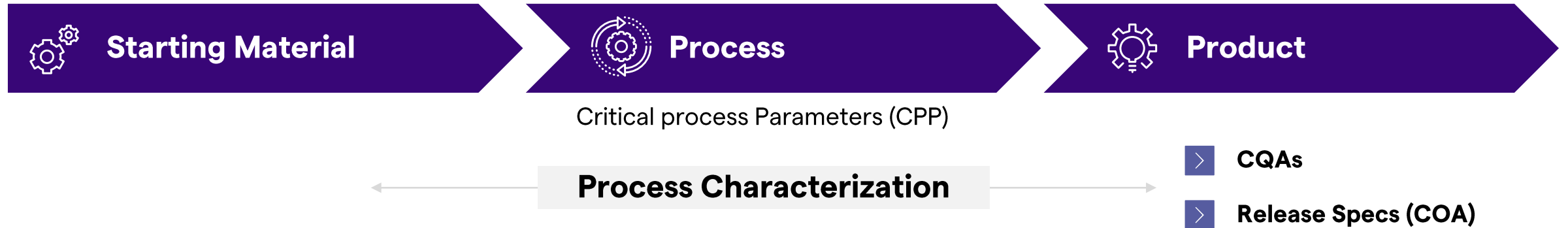


# Typical Allogeneic CAR-T Cell Processes with Scaled Up Expansion



# The Path To Commercial Manufacturing Begins With a Well-defined Process

For Consistent Manufacturing of High-quality Product



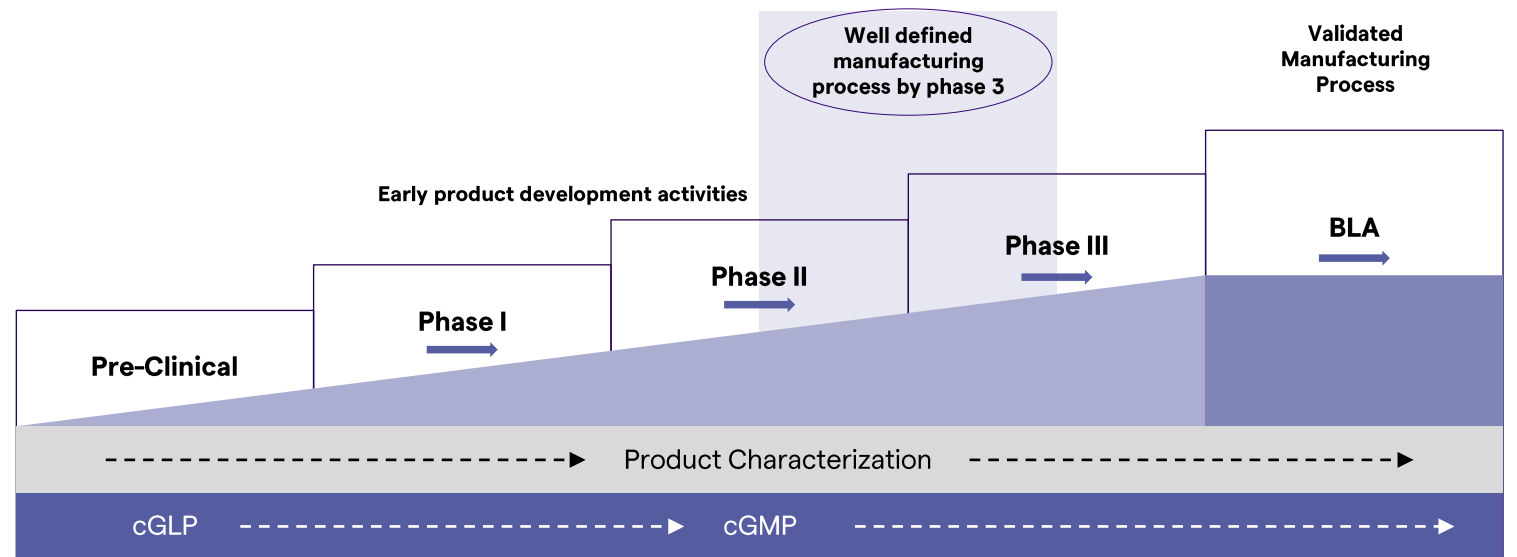
## Regulatory requirements for manufacturers:



Identify critical process parameters (CPPs) in the manufacturing process



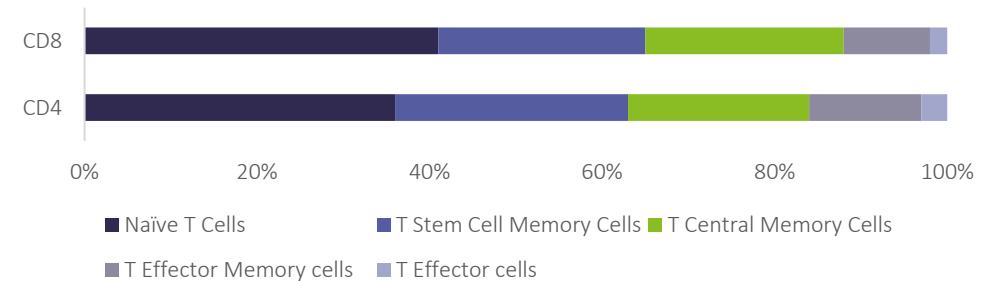
Critical product attributes (CQAs) to ensure the desired clinical effect of the final product



# In-Process Controls

## For monitoring the process

- Define control and action limits around each unit operation to ensure adequate control of the manufacturing process
- Some of the suggested process controls for CAR-T cell therapies
  - CD3, CD4 and CD8% of the starting material (Apheresis)
  - Post Selection T cell recovery
  - Post selection cell purity (CD3%) and phenotype (Memory subsets)
  - Post-selection Impurities (RBC, Platelets, tumor cells)
  - Transduction or Transfection or Transposition efficiency
  - Monitoring for Memory Phenotype, activation State and exhaustion markers during expansion
  - Cell count and cell viability throughout culture and downstream processing
  - Process residual clearance



# Assays for Allogeneic CAR-T cell Therapy

<b>Assay Release</b>				
<b>Assay</b>	Objective	Method	Evaluation Criteria	Category
<b>Cell Count &amp; Viability</b>	Dose	NC-200	% viability >70; minimum cell number /vial or Cell concentration / mL	Release Assay
<b>Phenotype</b>	Identity & Purity	Flow cytometry	CD3%, CD4%, CD8%, CAR%	Release assay
<b>Phenotype</b>	Cellular Impurities	Flow cytometry	CD19/CD20, CD56, CD14, CD15, Tumor cells	Release assay or FIO
<b>Copy Number</b>	Gene Modification	qPCR/ddPCR	No of copies of corrected gene	Release assay
<b>Knock-out %</b>	Gene Modification	Flow cytometry	% TCR-alpha beta negative cells	Release assay
<b>Knock-in %</b>	Gene Modification	ddPCR/ Targeted Sequencing	% of gene modified cells in product	Release assay
<b>Mycoplasma Testing</b>	Safety	MycoPCR or USP	Negative	Release assay
<b>Sterility Testing</b>	Safety	USP or BacT	Negative	Release assay
<b>Endotoxin Testing</b>	Safety	USP	Standard QC release (<0.5 EU/ml)	Release assay
<b>Visual Inspection</b>	Safety	USP	No visible particles	Release assay
<b>Potency Assay</b>	Potency	Various	Indication specific potency (cell activation, cytotoxicity and cytokine secretion)	Release assay
<b>Characterization Assays</b>				
<b>Process Residuals</b>	Residual clearance	Various	Demonstrate clearance of process related impurities such as Serum, Albumin, cytokines, RNPs, ssDNA	FIO*

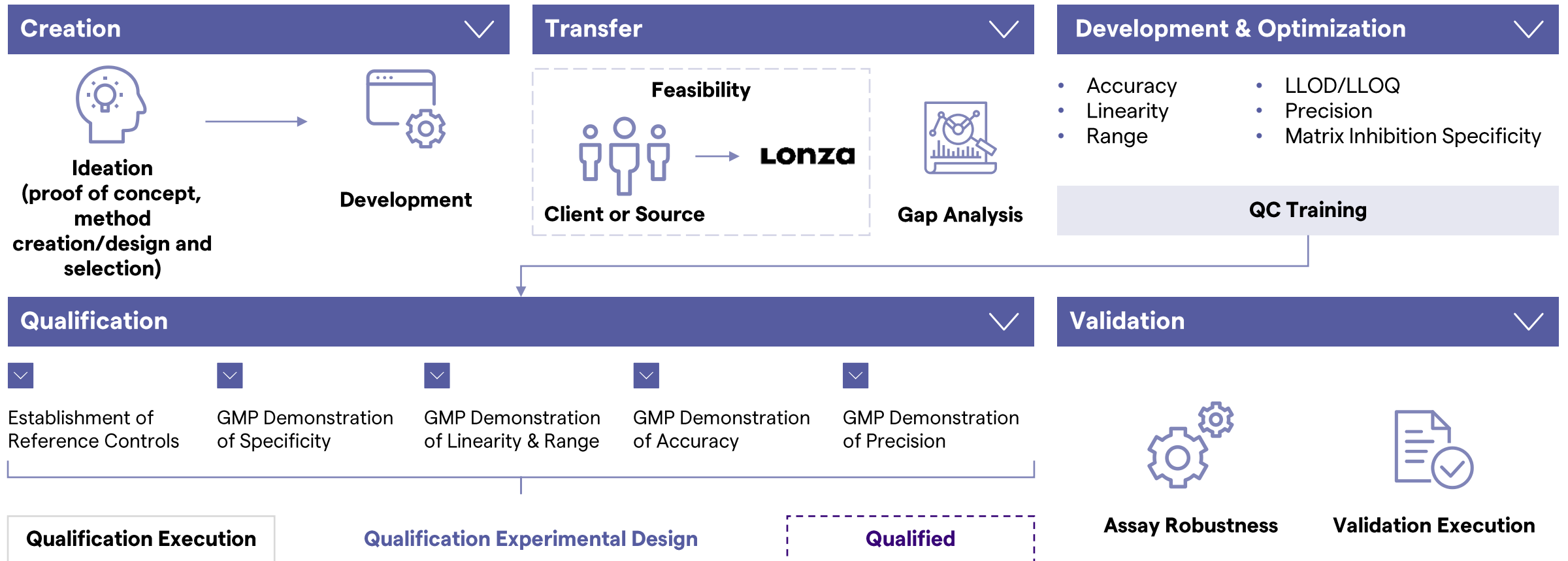
# Additional Characterization Assays for Allogenic CAR -T Gene Editing

Assay	Objective	Method	Evaluation criteria	Category
sgRNA design	Maximizing specificity and minimizing off-target cleavage	In-silico design	Evaluation of candidate sgRNAs	Development testing
On-Target Cleavage Detection	Confirm efficient and specific cleavage at desired site	ddPCR and endonuclease digestion	% of knock-out in pooled T cell post transfection	Development testing
On-Target Clone Validation	Confirm efficient and specific cleavage at desired site	Sanger Seq/ NGS	% of knock-out in T cell single clones post transfection	Development testing
Off-Target Validation	Safety	In-silico prediction/ Targeted Seq/ NGS	Zero off-target mutagenesis	Development testing

# Lonza support across the Analytical Lifecycle

Bioassay Services manages the maturation of assays throughout the product lifecycle

- Lonza's CGT Analytical Team has the experience and expertise to fulfill all analytical needs across the analytical lifecycle.





# What do we provide in analytical development?



## Assay transfer from client and feasibility studies

- > Gap assessment of client protocol according to each type of assays per ICHQ2R1 and USP1225



## Assay optimization:

- > Develop a robust, locked down method with suitable controls
- > Performance verification to define the criteria including assay range e.g. assay precision, accuracy, limit of detection



## Assay qualification

- > Early phase activity to generate documented evidence that the method consistently delivers correct results through an evaluation of the performance characteristics of the test method relative to the intended purpose or expected performance

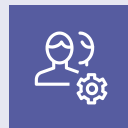


## Assay validation

- > Late clinical phase activity used to confirm the performance of tests using GMP material based on pre-set acceptance criteria



## Development of in process testing and control assays, and stability testing Product characterization

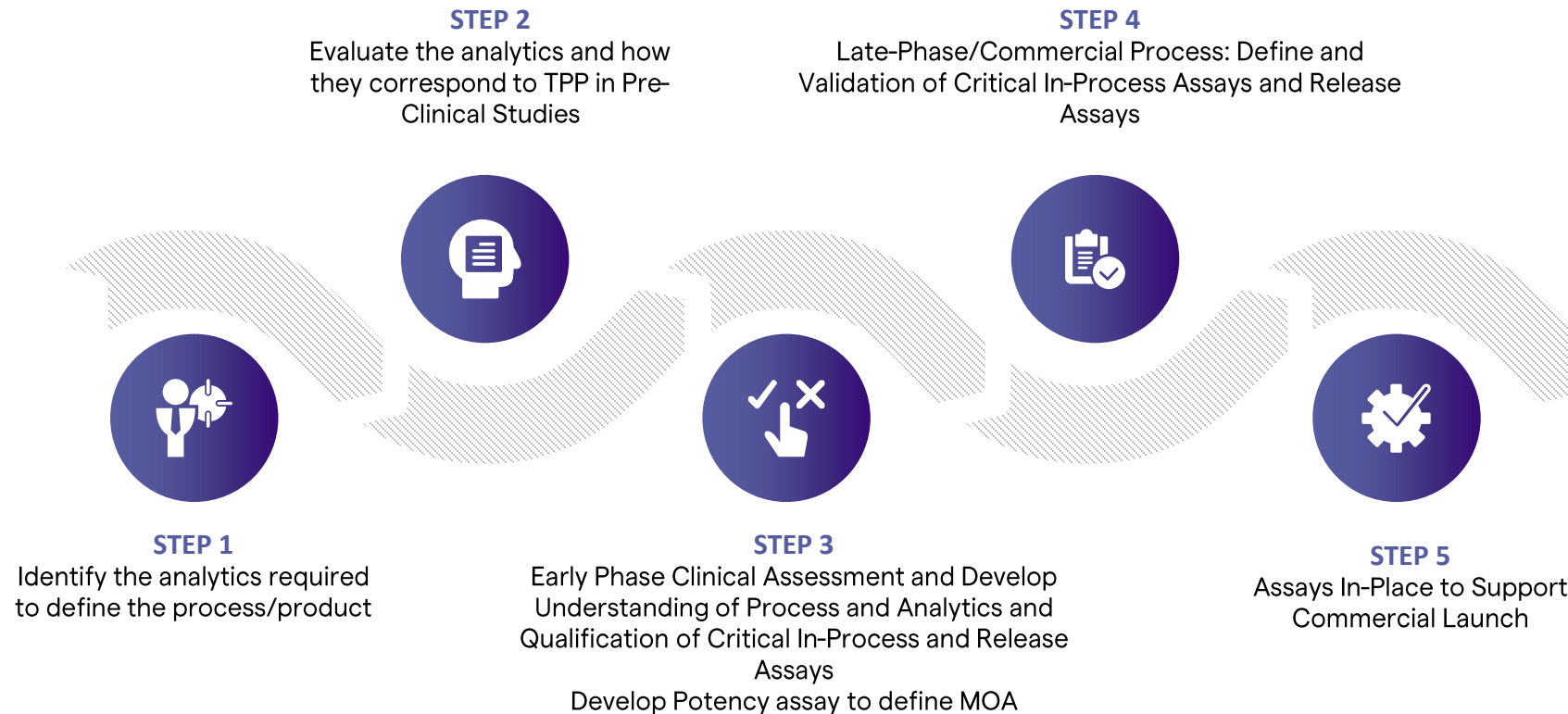


## Product characterization



## Seamless transition to QC for GMP testing

# What is the analytical pathway?



**Behind every successful commercial launch is detailed planning and preparation**

Cell & Gene Technologies

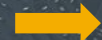
Off-the-shelf  
Bioassay  
Library

# Timeline reduction with off-the shelf assays

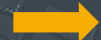
~5-7 months after contract signature

**Current Standard**

Feasibility/  
Development



Optimization



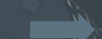
Qualification

Individual assays are Optimized and Qualified per client/product, **often recreating previous work on similar products**

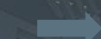
Lonza develops prior to contract signature

**Platform assay Development**

Development  
(if needed)



Optimization



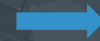
Qualification

A representative product can be **Optimized and Qualified, eliminating the need to repeat** these activities for each similar product in the future

~2-3 months *after* contract signature

**Product-specific Qualification using Platform Assays**

Feasibility –  
Apply to new  
product



Qualification –  
Sample Matrix  
Verification

**Minimal experiments to verify** the validity that the Platform Optimization/ Qualification applies to the new product

**Implementation of Qualified Assays**

~0-2 months *after* contract signature

Implementation &  
Verification study

**Focusing on implementation / minimal verification studies** to ensure there is no variability or product / process impact



# Assay families covered\*

## Safety

CAR-T/TCR/NK cells for both allogeneic and autologous therapies



## Identity

AAV



## Strength

Lenti



## Purity

Adenovirus



## Quality

hiPSCs



## How will it work?

As part of feasibility gap assessment, we **recommend pre-developed assays based on your therapy**

and

We will **test and verify** the assays for your therapy and **ensure that they meet your critical quality attributes**



# Meet Your Timelines

...

# and Map Out the Future

Reduce timelines by up to 2-6 months\*



- Utilize pre-developed catalog of assays
- That still fits to your specific product
- Ensure a smooth transfer of analytical methods into GMP manufacturing

De-risk your clinical development



- Meet the critical quality attributes (CQAs) of your product
- Leverage Lonza's 20+ years of technical expertise in CGT
- Navigate regulatory pathway with ease

Have a clear path forward

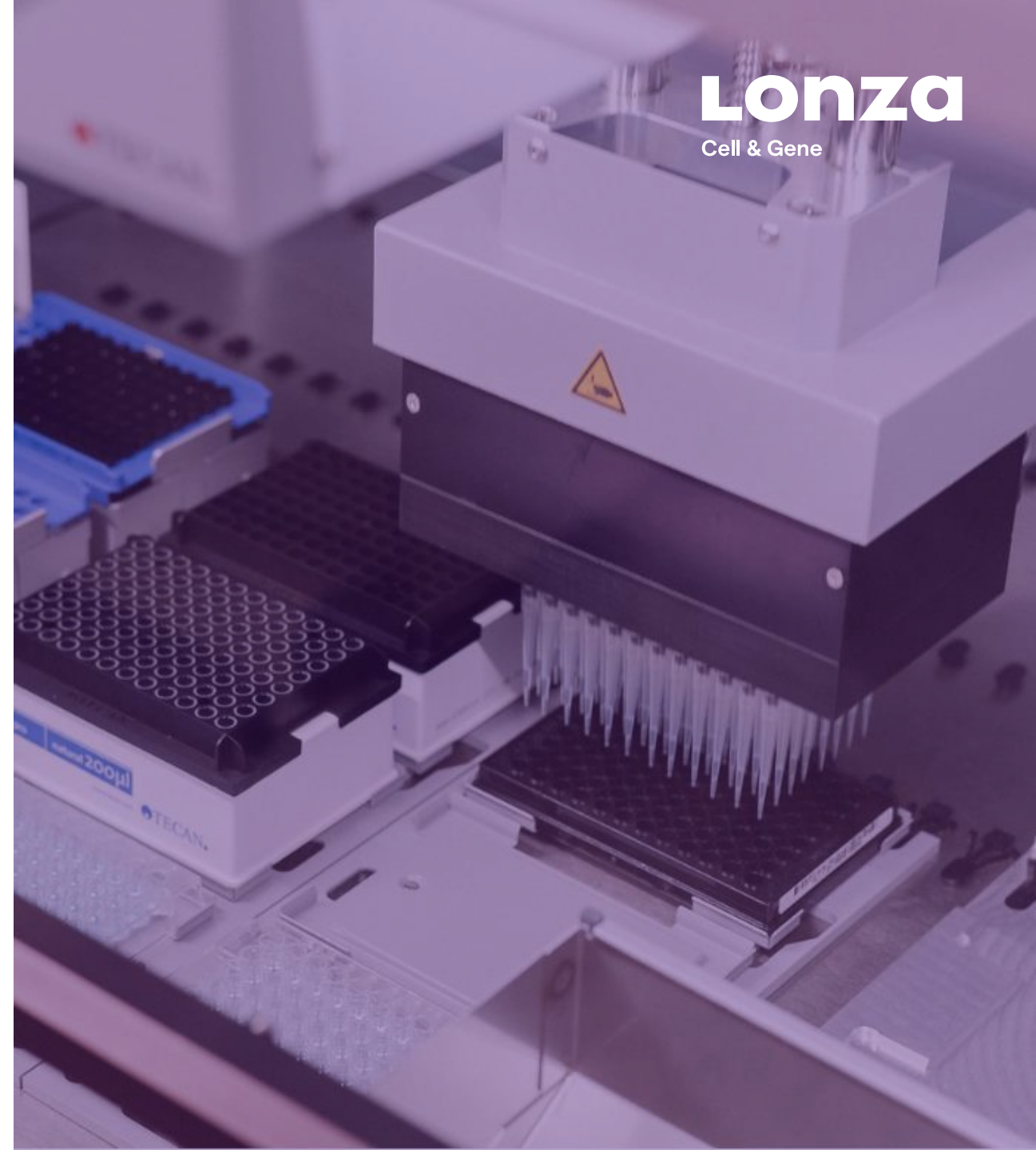


- Clear contractual terms
- Tech transfer package and documentation defined
- Flexibility

\*If applicable, to be verified based on specific customer process

# Assay Automation

Solving the Assay Pain Points  
in Commercial Cell & Gene  
Therapeutic Product  
Manufacturing





# Lean to Automated Sample Preparation

## Liquid Handling Systems

### Implementing consistency for complex and/or time-consuming manual-based procedures

- Reduce analyst variation and potential deviations/errors
- Increase consistency of assay performance



BD FACS Lyric



BD FACS Duet



Tecan



# ELISA Automation Overview

Tecan (Freedom EVO) at Lonza Houston



## Automation advantages

- Relieve operators from repetitive tasks: in-process and routine testing
- Robotic arms for pipetting and labware movement
- Optimize assay precision, accuracy and consistency
- Meet throughput, cost saving and productivity targets
- Automation extension for other assays
  - ELISA dilution preparation
  - qPCR and ddPCR sample preparation
  - TCID50 assay sample dilution
  - NGS sample preparation - Automated library preparation, quality control and pooling
  - Colony picking & plating

# Shortened Timelines, Faster Turnarounds

Leveraging our standard *New Product Introduction & Lifecycle Process* (1/2)



## New Product Introduction



## De-risked product introduction



## Standardization across 6 key workstreams



## Well-defined processes turned into manufacturing successes



## A New Paradigm

- 1 Robust fit assessment to ensure alignment with Lonza requirements
- 2 Standard requirements to identify issues early on
- 3 Reduced compliance risk
- 4 Avoidance of delays and rework

- 1 Raw materials
- 2 Sterility assurance
- 3 Analytics
- 4 Manufacturing Processes
- 5 Facilities & equipment
- 6 Tissue acquisition

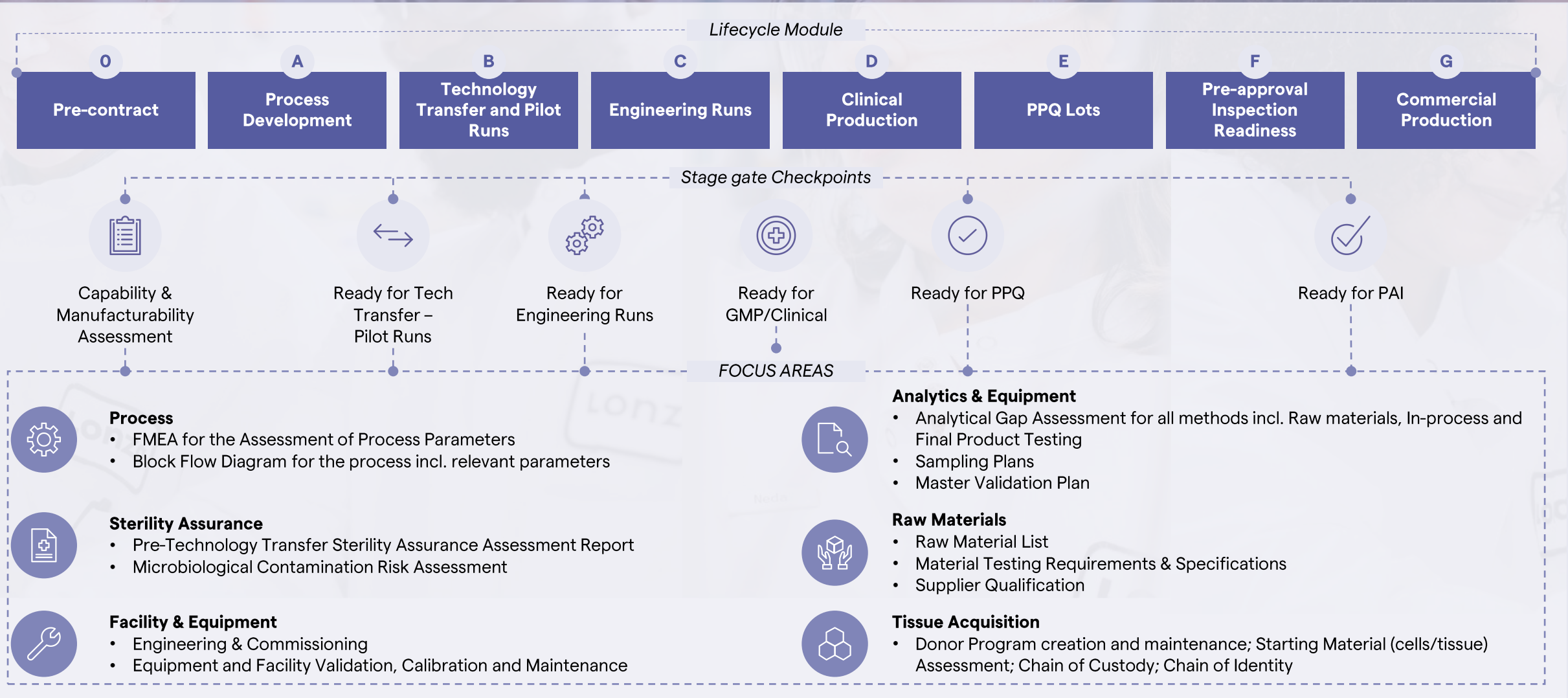
- 1 Clearly defined deliverables at each stage gate with checklists
- 2 Standard tech transfers across the globe
- 3 Support from capability assessment to commercial production

# Shortened Timelines, Faster Turnarounds

Leveraging our standard *New Product Introduction & Lifecycle Process (2/2)*

**Lonza**

Cell & Gene










# Established Leading Partner for Innovators in the Cell & Gene Space

## Cell & Gene Technologies value proposition

**Lonza**

Cell & Gene

<p><b>Offering across all cell and gene modalities</b></p>	 <p><b>Autologous &amp; Allogeneic cell and gene therapies</b></p>	 <p><b>Viral Vectors (inc. Lentiviral vector and AAV)</b></p>	 <p><b>Exosomes and EV-based therapeutics</b></p>	
<p><b>Integrated Solutions</b></p>	 <p><b>Process &amp; Assay Development</b></p>	 <p><b>Clinical &amp; Commercial Manufacturing</b></p>	 <p><b>In-house Tissue Sourcing</b></p>	 <p><b>Regulatory Support</b></p>
<p><b>Expertise and track record</b></p>	<p><b>&gt;20 years</b> of GMP Experience</p>	<p><b>&gt;160</b> Customers Served Globally</p>	<p><b>&gt;200</b> Process Development Projects Delivered</p>	<p><b>&gt;15</b> Phase III/ Commercial Projects</p>
<p><b>Global network and capabilities</b></p>	<p><b>4 sites</b> across <b>3 continents</b> for CGT manufacturing</p>	<p><b>2</b> sites dedicated to <b>Exosomes</b> (US &amp; EU)</p>	<p><b>3 Commercial CGT Products</b> at a single site (Houston)</p>	<p><b>&gt;1,200 Employees</b> dedicated to CGT</p>

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Enabling a Healthier World

**Lonza**  
Cell & Gene

**Thank You!**



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Enabling a Healthier World

**Lonza**  
Cell & Gene

# Extra Slides



# Established Commercial Manufacturing

Across a global network



## Lonza Houston



**PAI approvals in Feb 2021,  
Aug 2022, Sep 2022**



**Certified CGT commercial site,  
manufacturing both viral  
vectors and cell therapy for 3  
commercial CGT products**



**Capacity expansion:**

- 32,500 square feet of manufacturing space expansion
- >200 clinical and commercial batches annually
- Additional shell space for rapid and flexible modular expansion

20+ years of experience  
in viral vector  
manufacturing

Over 8 years of  
extensive experience in  
LVV production (over 60  
GMP batches)

R&D Innovation &  
Process Development  
expertise to support  
process industrialization  
and de-risked  
manufacturing

Off-the-shelf, pre-  
developed assay library

Global regulatory  
support through entire  
program life cycle



# Established Commercial Manufacturing

Across a global network

# Lonza

Cell & Gene



## Lonza Houston



**CGT PAI approvals in Feb 2021, Aug 2022, Sep 2022**



**Expansion space available**



**Manufacturing >200 clinical and commercial batches annually of both viral vectors and cell therapy for 3 commercial CGT products**



**World's most commercially licensed biological site**



**over 50 licensed commercial products, including the Moderna COVID vaccine in 2020 (mRNA).**



**Expansion space available**



## Lonza Netherlands



**Highly flexible, established commercial site in Europe combining CGT and mRNA**



**Expansion space available**



**Experience manufacturing EU approved commercial products + ongoing PAIs**



**One of the most commercially licensed Biological sites in Asia with 9 commercial products**



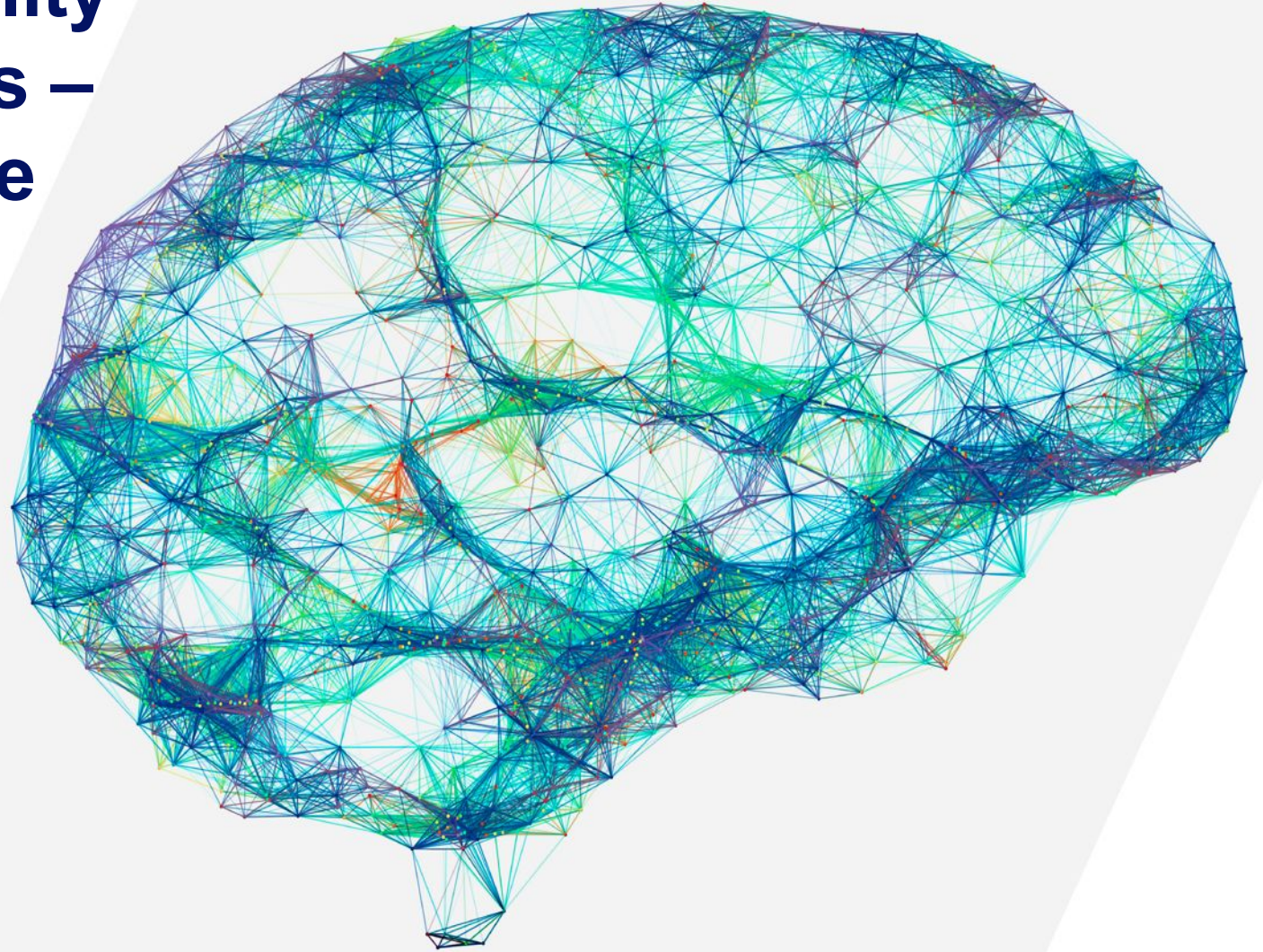
**20+ successful inspections from various agencies with no critical observations**



**Expansion space available**

# Gene therapy comparability challenges and practices – an industry perspective

David Litwack, PhD





# Disclaimer

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- I am an employee of Prevail Therapeutics, a wholly owned subsidiary of Eli Lilly
- Views and opinions expressed are my own



# Special challenges posed by new technologies

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- Technology constantly improving
- Many gaps in scientific knowledge
- No uniform practices (assays, manufacturing, etc.)
- Effects of product quality on safety and efficacy not well understood
  - Too few patients in any given gene therapy trial



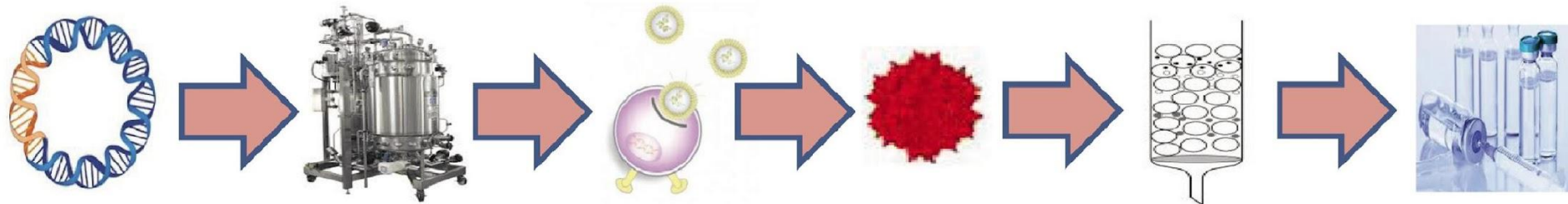
# Gene therapy manufacturing challenges

- Complex biology
- Inconsistent manufacturing
- Mixed results with both HEK and baculovirus platforms
- Manufacturing changes during product development
- Limited material for characterization, comparability
- No standard cutoff for CQAs
- Lack of standard methods for measuring CQAs
- Assays are not standardized
  - Differences in sensitivity, precision, etc.
  - No ground truth
- High-priority examples
  - Partial capsids
  - Aggregates

Quality Attribute Category	Quality Attribute
Safety	Bioburden
	Endotoxin
	Sterility
Content/strength	Appearance/particulates
	pH
	Osmolality
	Vector genome titer
	Potency (protein expression)
	Potency/infectious genome titer
Identity	Capsid identity
	Genome identity
Process impurities	Residual cell culture media components
	Residual host cell protein
	Residual plasmid DNA
	Residual host cell DNA
	Residual transfection reagent
	Residual chromatography ligand
	Replication-competent AAV
Purity	Capsid protein purity
	Capsid protein ratio
	% full capsids
	Total capsids
	Aggregates/subvisible particles



## AAV viral vector manufacturing workflow

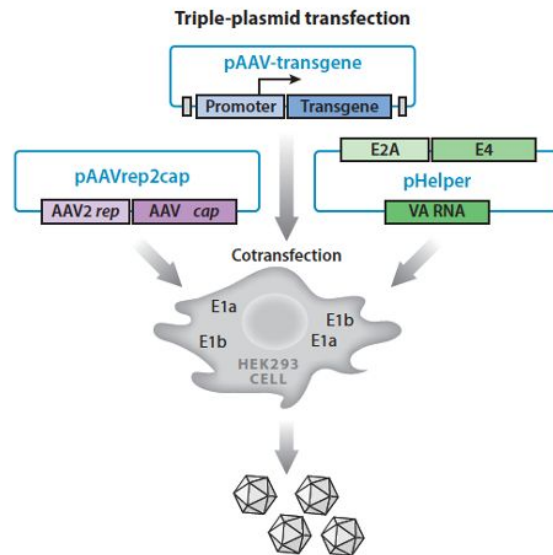


Srivastava (2021)

# HEK293 vs Sf9/baculovirus

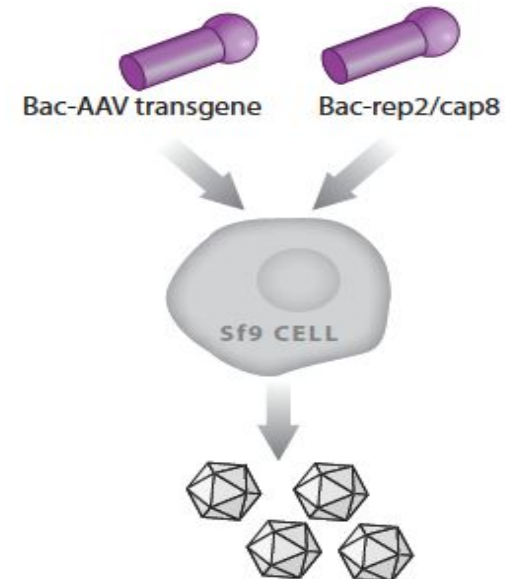
## HEK process

- Yield up to  $\sim 1E14$  vg/L harvest titer
- Upstream production  $< 20\%$  full capsids
- Adherent and transfection-based systems, and traditional ultracentrifugation difficult to scale
- Long history, more experience
- Faster time to AAV production



## Sf9/Bac process

- Yield  $> 1E15$  vg/L harvest titer (10-100X adherent process)
- Upstream production  $> 50\%$  full capsids
- Can be manufactured in bioreactors from 50 L to  $> 2000$  L scale
- Fewer CMOs with experience
- Overall higher upfront costs and lower long-term costs
- Longer time to AAV production



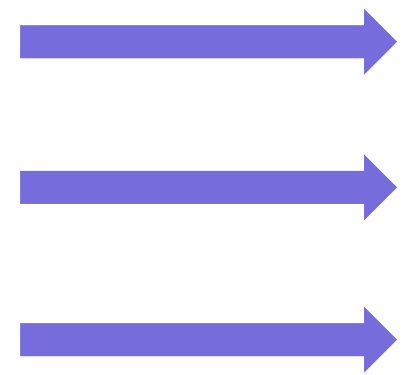
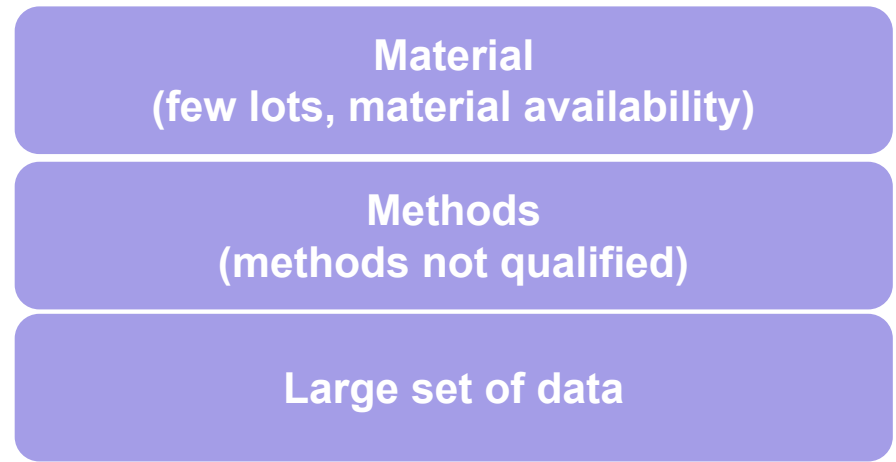


# How to Show Comparability ?

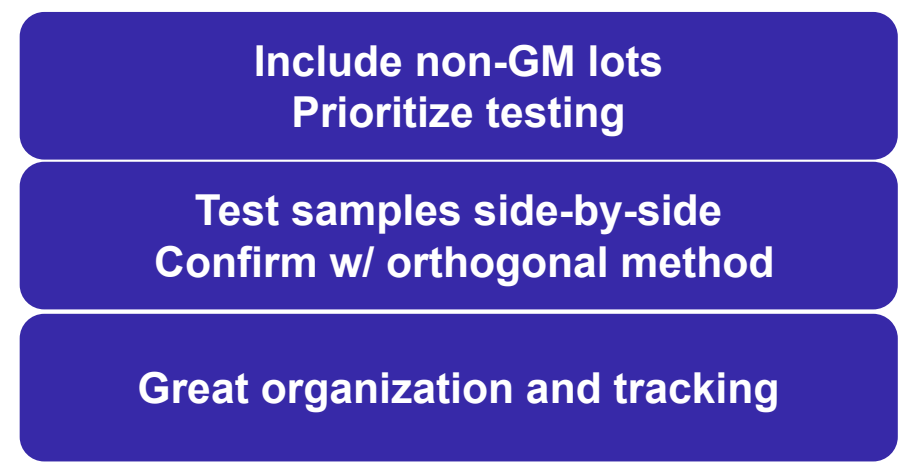
Products need be "**highly similar**" with "**no adverse impact**" in:



## Challenges



## Approach



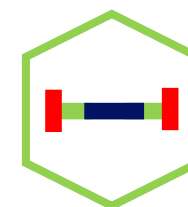




# Quality: AAV Particle distribution

## Analytical Ultracentrifugation

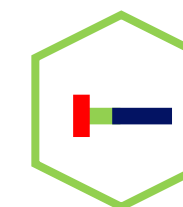
Process	Batch	Empty (%)	Partial (%)	Full (%)
HEK	Lot 1	3.9	47.7	39.9
	Lot 2	12.5	38.6	34.4
SF9	Lot 1	6.6	3.0	76.5
	Lot 2	8.6	3.5	80.9
	Lot 3	5.5	5.2	82.8
	Lot 4	3.1	9.2	84.3



Full Capsid



Empty Capsid



Partial Capsid

Process-related Impurities



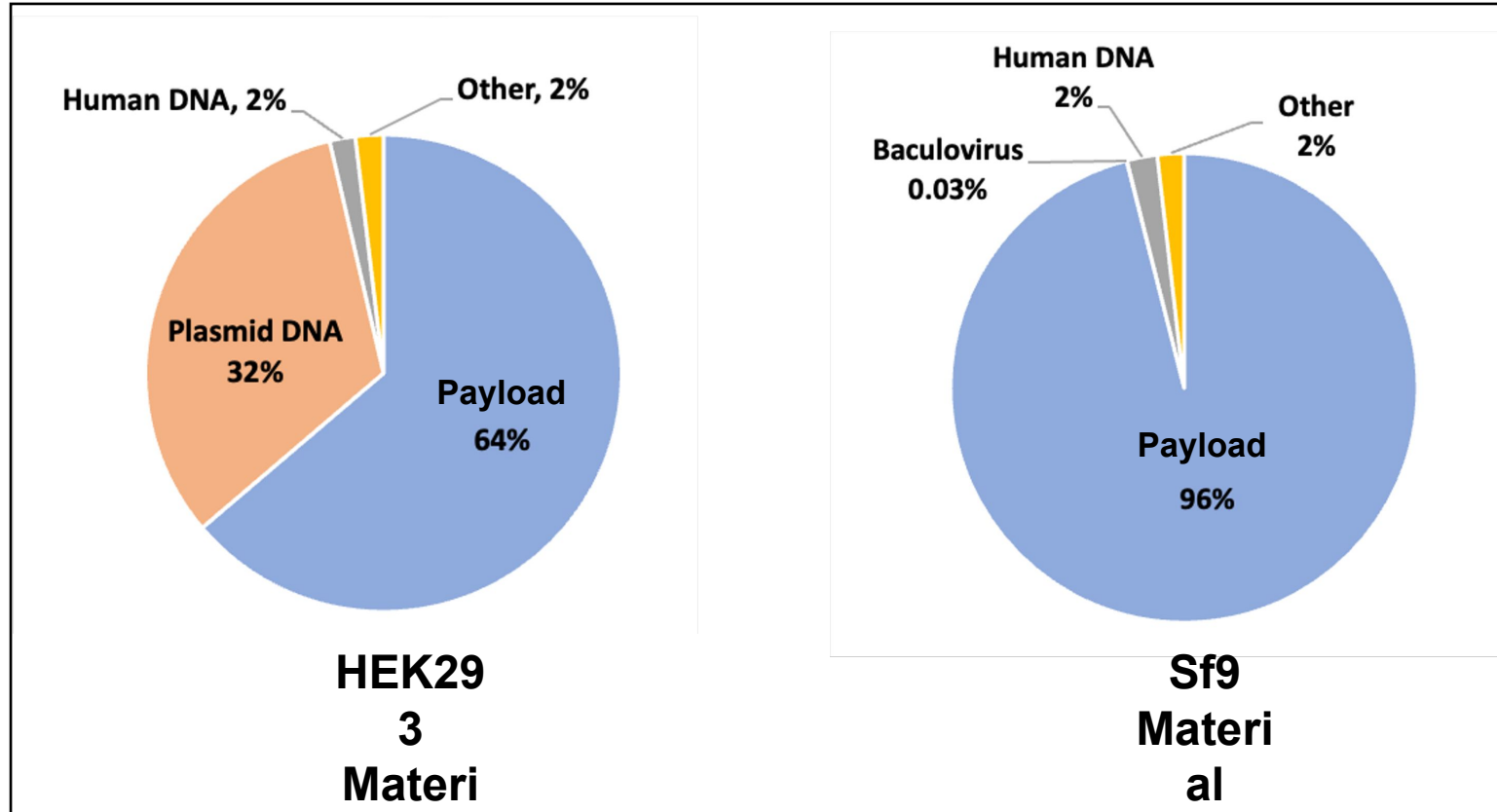
**New platform: higher % Full, fewer Partials and Empty Capsids**

**“No adverse impact” on quality**

# Quality: DNA Residuals



## Next Generation Sequencing



Sf9 platform: Fewer DNA residuals

*“No adverse impact” on quality*

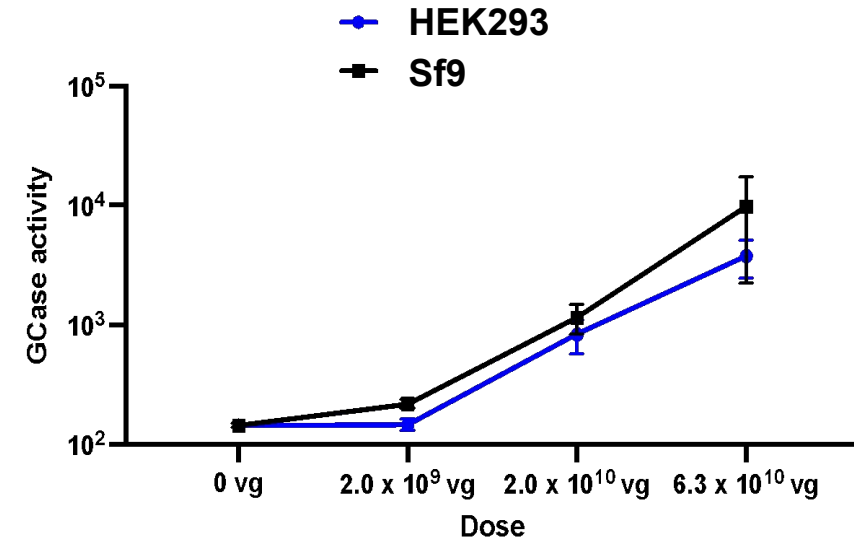
# Efficacy: Comparable efficacy

## *In vitro* Analytical Potency Assay

Platform	Batch	Relative Potency
HEK293	Lot 1	153%
	Lot 2	143%
Sf9	Lot 3	142%
	Lot 4	93%
	Lot 5	113%

Assay variability 30% CV

## *In vivo* Cerebral Cortex GCa6 activity in the CBE Mouse Model



No statistically difference between lots, highly similar in-vivo efficacy

Comparable efficacy



# Safety: Similar Safety

## CMC Analytics

Test	PR001A (v1.0)	PR001A (v2.0)
Sterility	No Growth	No Growth
Endotoxin	≤ 0.5 EU/mL	≤ 0.5 EU/mL
Mycoplasma	Not detected	Not Detected
In- vitro Adventitious virus	Not Detected	Not Detected
In-vivo Viral contaminants	NT	Not Detected
rcAAV (Replicative competent AAV)	Not Detected	Not Detected

## Toxicology Study in NHPs

*“No in-life or clinical or anatomic pathology findings related to the gene product were observed. Therefore, the dose levels were well-tolerated by male and female monkeys dosed via intracisternal injection to the cisterna magna.”*

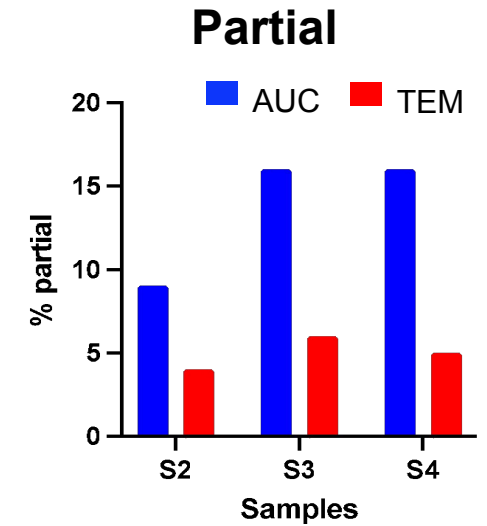
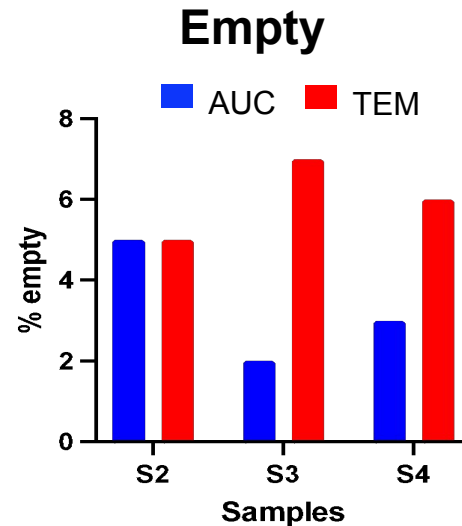
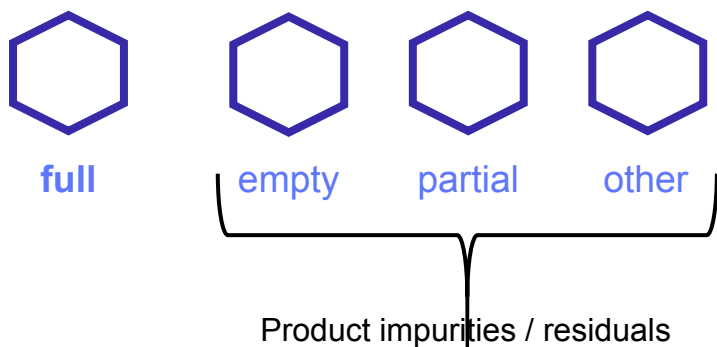


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Capsid proteins (V1, V2, V3): no change in



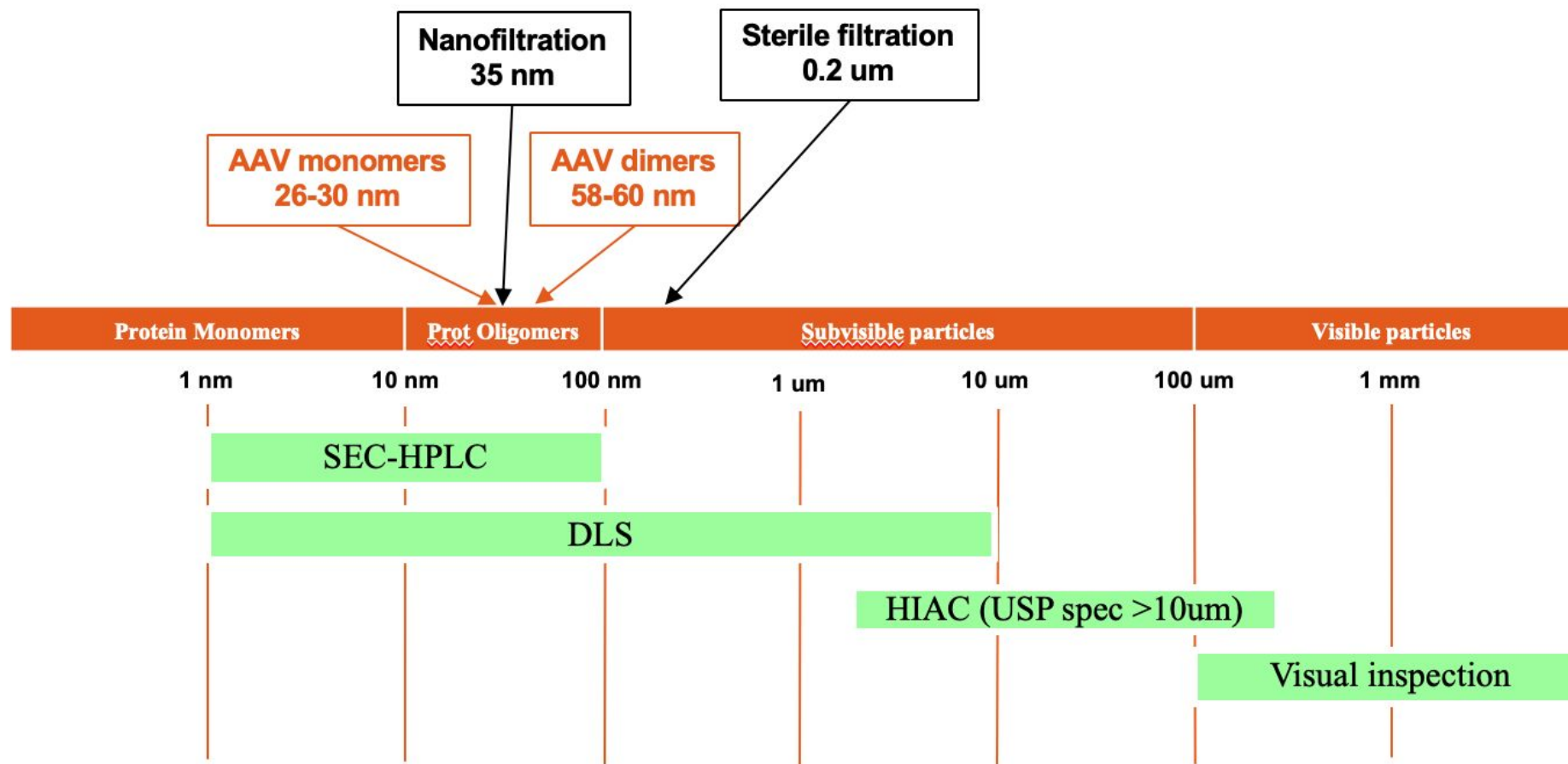
# Partial capsids



- Many techniques do not distinguish partial capsids
- TEM seemingly overestimates the number of empty species and underestimates the proportion of partial species compared to AUC



# Aggregation Testing for AAVs



# A combination of analytical techniques is required for assessing particle composition



S. No.	Technique	Detection of partial/intermediate species
1	Genomic Titer to Capsid Titer	✗
2	Analytical Ultracentrifugation	✓
3	CryoTEM	✓
4	SEC-MALS	✗
5	Anion Exchange Chromatography	✗
6	Mass Photometry	✓
7	Charge Detection Mass Spectrometry	✓

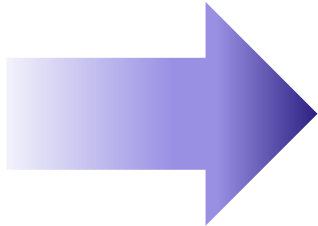
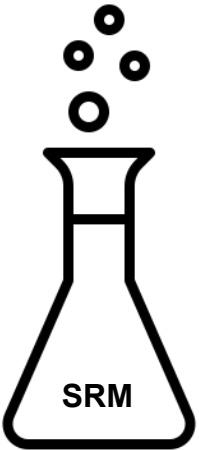
Additional requirements:







# How can standards help?



More uniformity in manufacturing

Comparability of results

Speed product development and regulatory review

Enable data sharing

Advance knowledge

# Acknowledgements

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- Jorge Haller
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