



# Session 5: Regulatory Planning for the US & Global Market - Implications for Strategy and Financing

June 12, 2022

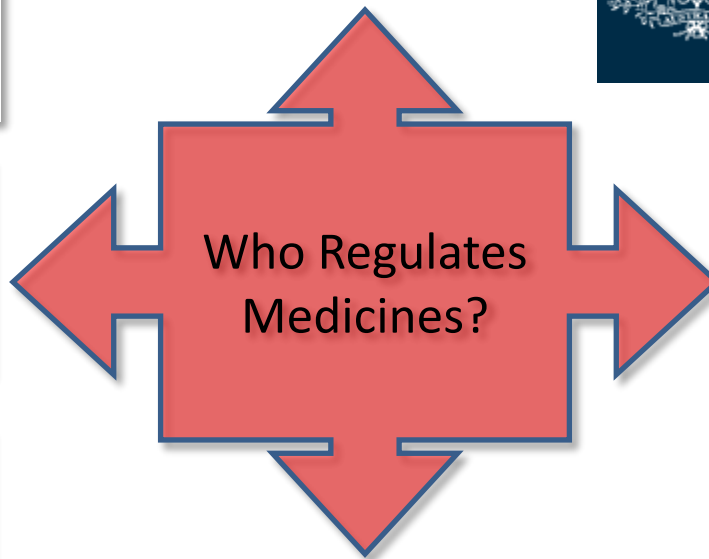
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#BIO2022 #LimitlessTogether

# **Biotechnology Entrepreneurship Boot Camp**

**Session 5: Regulatory Planning for the US & Global  
Market - Implications for Strategy and Financing**

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President & Principal Consultant  
TS Pharma Experts LLC**



# FDA Organization

**Office of the Commissioner**

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graph TD; OC[Office of the Commissioner] --- CBER[Center for Biologics Evaluation and Research]; OC --- CDER[Center for Drug Evaluation and Research]; OC --- CDRH[Center for Devices and Radiological Health]; OC --- OCE[Oncology Center of Excellence];
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**Center for Biologics  
Evaluation and Research**

**Center for Drug  
Evaluation and Research**

**Center for Devices and  
Radiological Health**

**Oncology Center of Excellence**

Current as of April 6, 2022

# FDA Organization

**Office of the Commissioner**

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graph TD; OC[Office of the Commissioner] --- CVM[Center for Veterinary Medicine]; OC --- ORA[Office of Regulatory Affairs]; OC --- CFSA[Center for Food Safety and Applied Nutrition]; OC --- CTP[Center for Tobacco Products];
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**Center for Veterinary Medicine**

**Office of Regulatory Affairs**

**Center for Food Safety and Applied Nutrition**

**Center for Tobacco Products**

# FDA Organization

**Office of the Commissioner**

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graph TD; OC[Office of the Commissioner] --- OCPP[Office of Clinical Policy & Programs]; OC --- OEA[Office of External Affairs]; OC --- OFPR[Office of Food Policy & Response]; OC --- OMHE[Office of Minority Health & Health Equity];
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**Office of Clinical Policy & Programs**

**Office of External Affairs**

**Office of Food Policy & Response**

**Office of Minority Health & Health Equity**

# FDA Organization

**Office of the Commissioner**

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graph TD; A[Office of the Commissioner] --- B[Office of Operations]; A --- C[Office of Policy, Legislation & International Affairs]; A --- D[Office of the Chief Scientist]; A --- E[Office of Women's Health];
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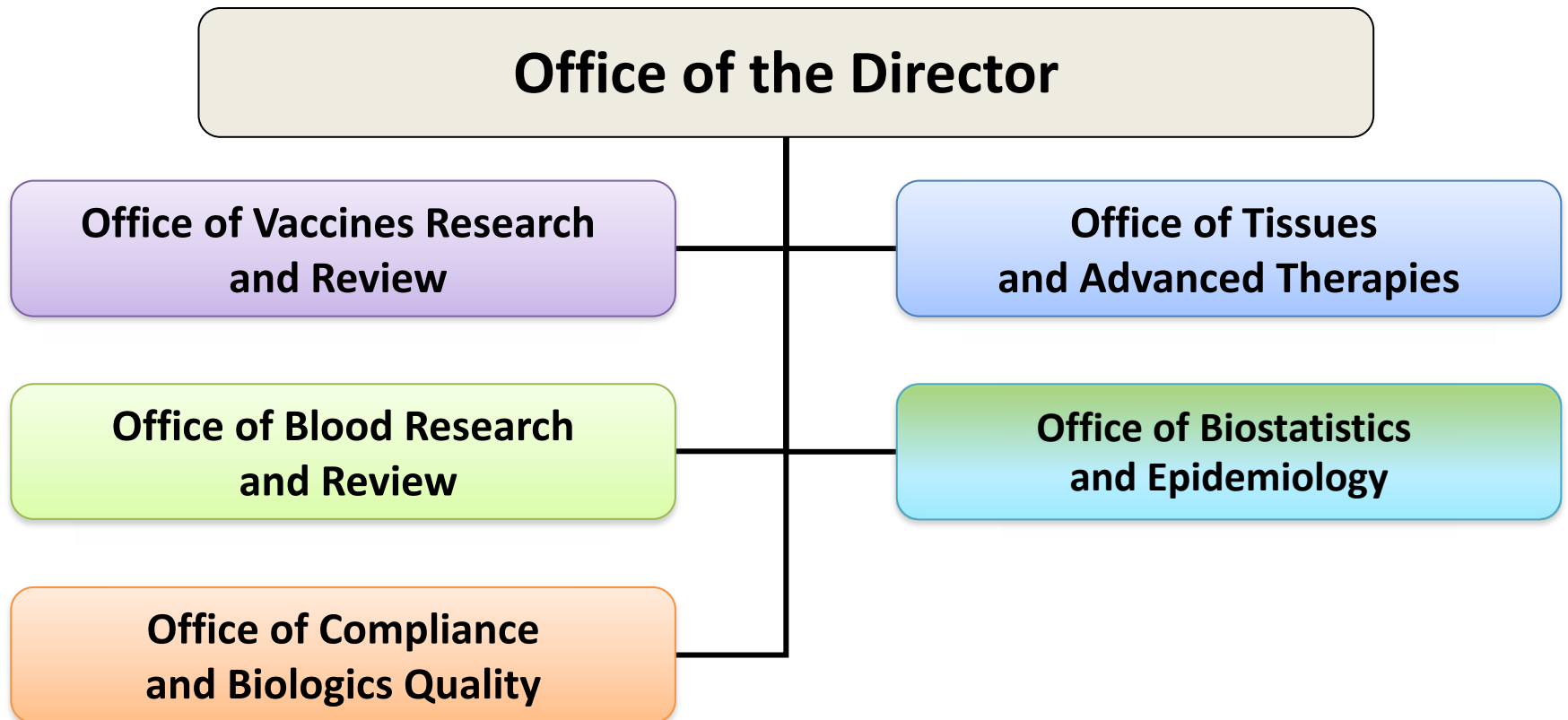
**Office of Operations**

**Office of Policy, Legislation & International Affairs**

**Office of the Chief Scientist**

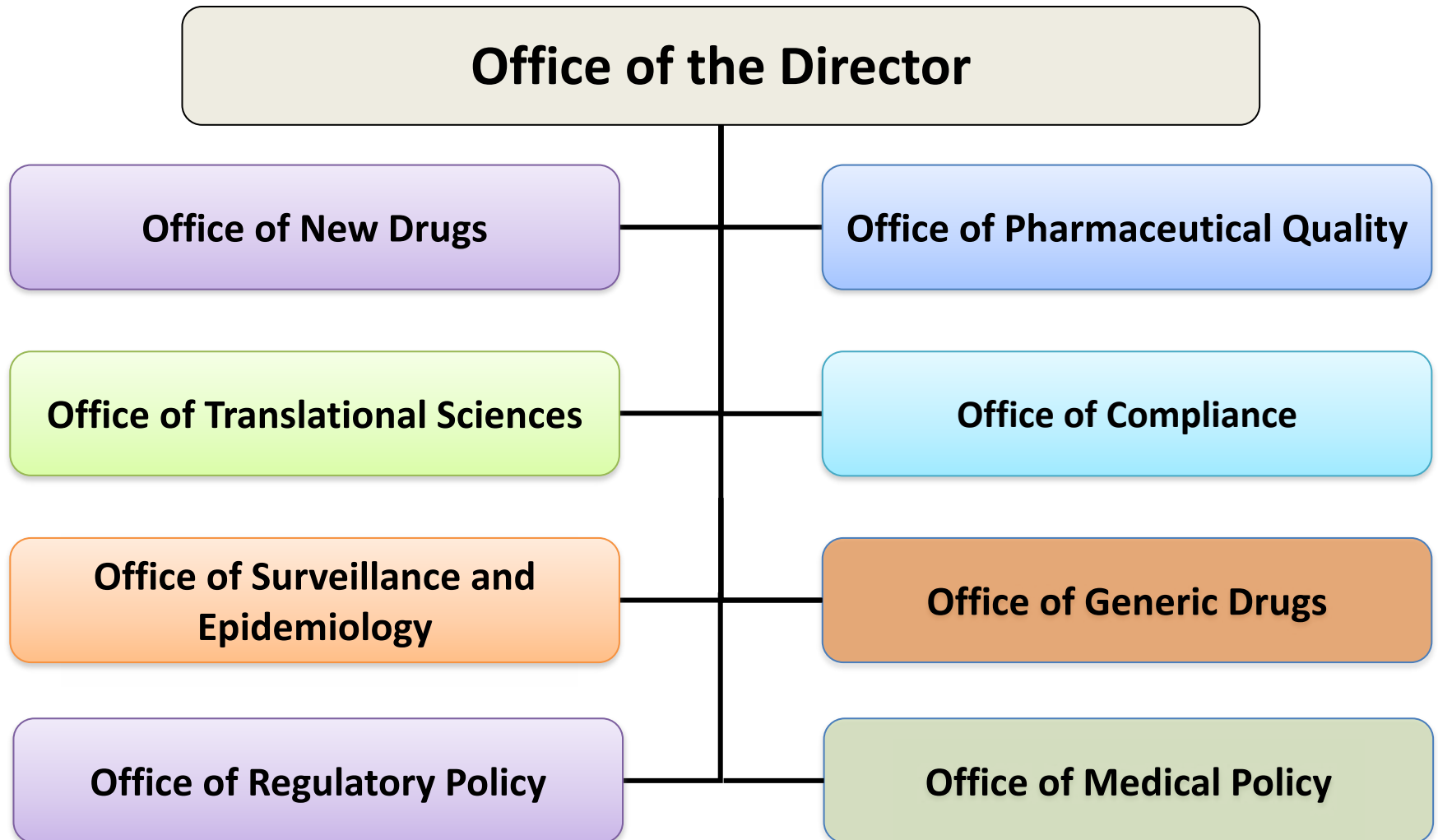
**Office of Women's Health**

# CBER Organization

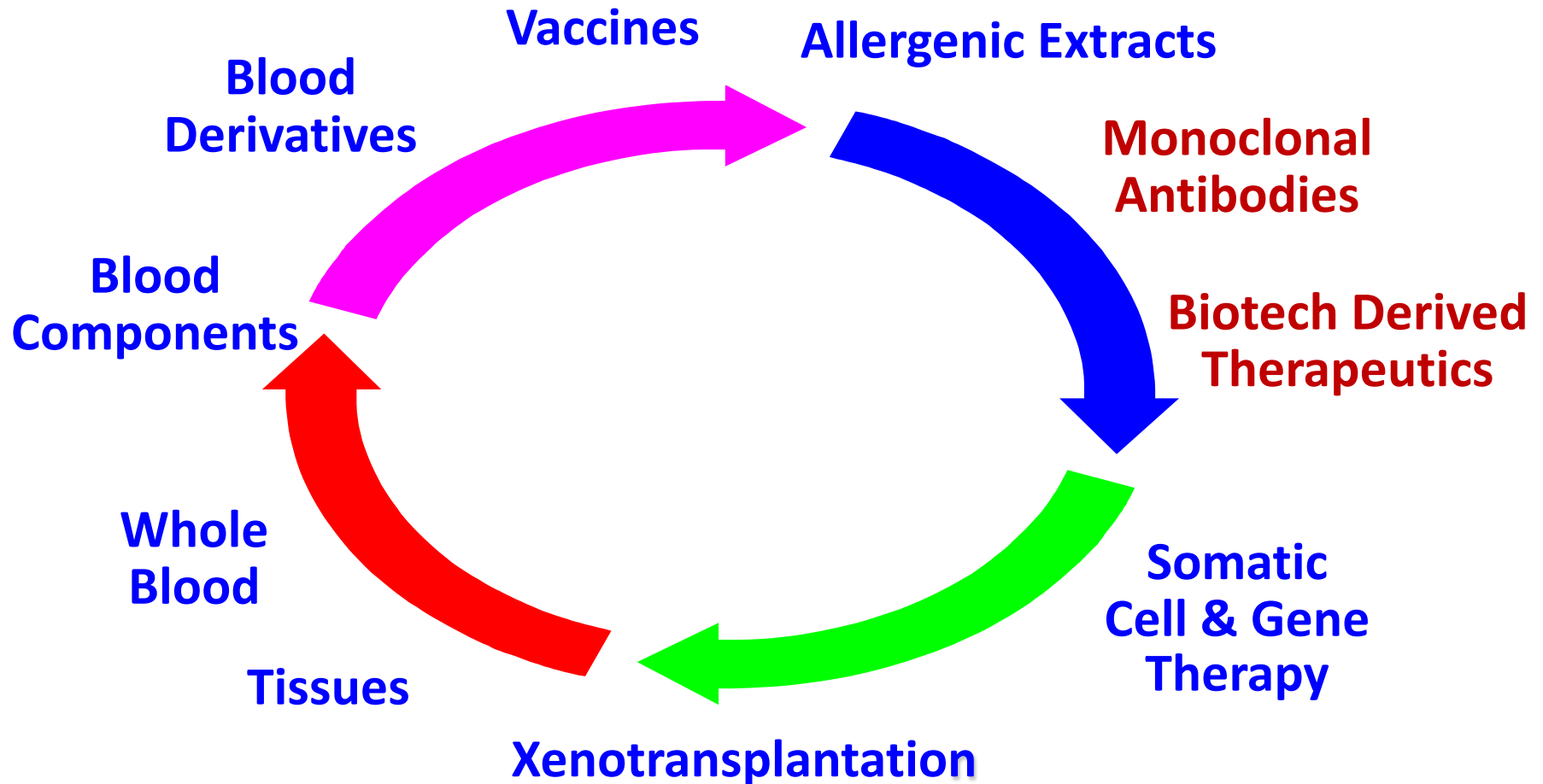




# CDER Organization



# BIOLOGICAL PRODUCTS REGULATED BY CBER or CDER



# Acts & Regulations Pertinent to Biological Product Development

- PHS Act (42 USC 262-63) Section 351
- FD&C Act (21 USC 301-392)
- Prescription Drug User Fee Act (PDUFA), 1992
  - User fees (application fee, establishment fee, product fee)
- FDAMA, 1997
  - Risk-based review of medical devices
  - Exemption for pharmacy compounding
  - Reauthorization of user fee for drugs
- Public Health Security and Bioterrorism Preparedness and Response Act (aka PDUFA III), 2002
- FDAAA, 2007
  - Reauthorization of user fee for drugs and medical devices
  - Reauthorization of Best Pharmaceuticals for Children Act and Pediatric Research Equity Act

# Acts & Regulations Pertinent to Biological Product Development

- **Biologics Price Competition and Innovation Act, 2009**
  - Created path for approval of biosimilars and interchangeable biological products
  - Exclusivity of 12 years for original biological product
  - Exclusivity of 1 year for first interchangeable biosimilar product
  - On March 23, 2020, all biological products approved under a NDA are “deemed” to be a BLA
- **FDASIA, 2012**
  - User fee for generic drugs, biosimilar drugs
  - Reauthorization of user fee for drugs and medical devices
- **FDARA, 2017**
  - User fee reauthorizations for drugs, medical devices, generics and biosimilars

# Acts & Regulations Pertinent to Biological Product Development

## ➤ 21 CFR

- 21 CFR 600-680 Biological Product Standards
- 21 CFR 314.126 Adequate and well-controlled trials
- 21 CFR 312 Investigational New Drug Application
- 21 CFR 210-211 Good Manufacturing Practices
- 21 CFR 4 Regulation of Combination Products
- 21 CFR 58 Good Laboratory Practices
- 21 CFR 56 Institutional Review Boards
- 21 CFR 50 Protection of Human Subjects

# Current Regulatory Pathways

## ➤ Biologic Products:

- IND – Investigational New Drug Application (21 CFR 312)
- BLA – Biologics License Application (21 CFR 600-680)

## ➤ Drugs:

- IND - Investigational New Drug Application (21 CFR 312)
- NDA – New Drug Application (21 CFR 314)

## ➤ Medical Devices:

- 510(k) – (21 CFR 807)
- IDE – Investigational Device Exemption (21 CFR 812)
- PMA – Pre-Market Application (21 CFR 814)

# Drug or Biologic - What difference does it make?

## ➤ IND PHASE

- Identical Regulations for Drugs and Biologics - 21 CFR 312
- Differences in emphasis and expectations of review divisions

## ➤ APPLICATION PHASE

- DRUGS: New Drug Application (NDA) Regulations - 21 CFR 314
- BIOLOGICS: Biologics Licensing Regulations - 21 CFR 601
- Harmonized Application Form - Form 356h; Drugs - NDA;  
Biologics-BLA

## ➤ POST APPROVAL PHASE

- DRUGS: Inspections, Annual Reports, Manufacturing changes  
( § 314.70)
- BIOLOGICS: Inspections, Lot release, Manufacturing changes  
( § 601.12)

# Laws, Regulations, Guidance

## ➤ LAWS:

- Public Health Services Act ([Biologics](#))
- Food, Drug and Cosmetic Act (Drugs)

## ➤ REGULATIONS:

- Code of Federal Regulations (CFR)
- Proposed rule – Comments – Final rule
- Title 21 – Food and Drug Administration Regulations
- 21 CFR 600 – Biological Products : General

## ➤ GUIDANCE:

- Represents FDA current thinking on a specific topic.  
Does not confer any rights and does not bind the FDA or the company



# Therapeutic Biological Products: CDER

- Monoclonal antibodies for in vivo use
- Proteins intended for therapeutic use, including cytokines (e.g. interferons), enzymes (e.g. thrombolytics), and other novel proteins, except for those assigned to CBER (e.g., vaccines and blood products). This category includes therapeutic proteins derived from plants, animals, microorganisms, and recombinant versions of these products
- Immunomodulators (non-vaccine and non-allergenic products intended to treat disease by inhibiting or modifying a pre-existing immune response)
- Growth factors, cytokines, and monoclonal antibodies intended to mobilize, stimulate, decrease or otherwise alter the production of hematopoietic cells in vivo

# Therapeutic Biological Products: CBER

- Cellular Products, including products composed of human, bacterial or animal cells .... or from physical parts of those cells
- Gene Therapy Products
- Vaccines
- Allergenic Extracts
- Antitoxins, antivenins, and venoms
- Blood, blood components, plasma derived products including recombinant and transgenic versions of plasma derivatives, blood substitutes, plasma volume expanders, human or animal polyclonal antibody preparations, and certain fibrinolytics such as plasma-derived plasmin, and red cell reagents

# TRANSLATIONAL DEVELOPMENT

Discovery  
Research



Regulated Product  
Development

Empirical, trial  
& error, unregulated  
environment

Structured, highly  
regulated  
environment

# How to get product into clinical development

- Demonstrate potential clinical usefulness (**early efficacy**)
  - In vitro and / or in vivo (animal) models of disease
- Demonstrate adequate **quality** of product
  - Reproducibly manufacture product
  - Demonstrate purity
  - Formulate into “medicine” – solution, tablet, capsule
- Demonstrate adequate **safety**
  - In vitro and in vivo safety studies
  - Characterize toxicity
  - Justify starting dose and proposed maximum dose

# Planning

- Start with an end in mind
  - Product for marketing or
  - Proof of concept
  
- Develop a basic Target Product Profile
  - Indication
  - Target population
  - Dosage
  - Presentation

# Translational Development – Regulatory Challenges



- GLP
- Choice of animal model/species
- GMP
- GCP
- INDs, BLAs, NDAs

## Comprehensive Product Development Planning and Management

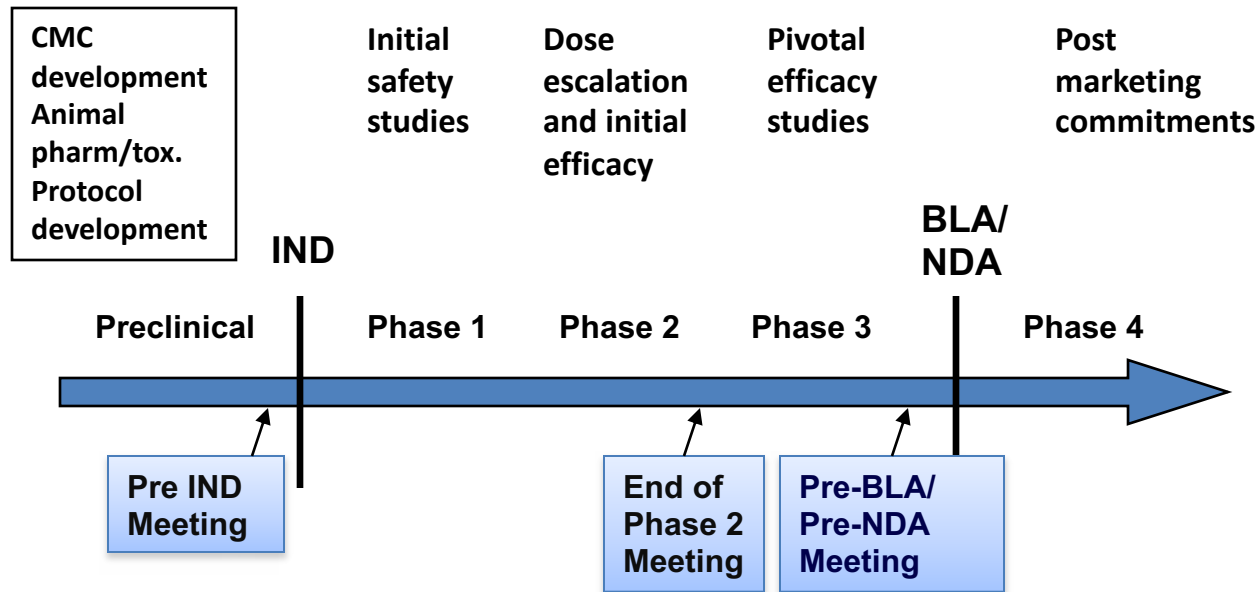
- Gap Analysis of all development areas
- Team approach to development management
  - Preclinical, CMC, clinical, project management

# What is required to make the transition?

- Comprehensive Product Development Planning based on understanding of FDA regulations and expectations
- Effective communication with the FDA to assure concurrence with development plans
- Project management expertise to oversee execution of Product Development Plan
- Upper management support – Product development is a team effort and success is highly dependent on availability of appropriate resources and by upper management support

# Product Development Phases

## SPONSOR:



## FDA:

30 Day  
Safety  
Review

Review amendments,  
annual reports, safety  
reports

8-12 Month  
Review (NME  
NDA/BLA)  
**6-10 Month  
Review (NDA)**  
12 Month Review  
(Biosimilar BLA)

Review Phase 4  
study reports



# Product Development Phases

- Discovery/Basic Research – (pre-IND)
  - No FDA Oversight – HOWEVER , failure to appreciate the regulatory requirements for future product development can result in significant delays when attempting to transition a product from the research lab to the clinic
- Process and Analytical Development (pre & post IND)
  - Process – Development & Optimization
    - Manufacturing consistency
  - Assays – Development & Specifications
    - Identity, Purity, Potency
    - Stability indicating
  - Drug Substance (Bulk Substance) and Drug Product Characterization

# Product Development Phases

- Preclinical Animal Studies (pre-IND)
  - Proof-of-Concept
  - Toxicology
  - Safety Pharmacology
- IND Submission
- Clinical Trials
  - Phase 0, 1, 2 & 3
- Product Approval/Licensure
- Post-Marketing Studies (Phase 4)

# Product Development Regulatory Goals

- Develop a reproducible process that can yield a consistent product and that can be run under GMPs
- Develop analytical procedures that can reliably measure product parameters, that are stability indicating, and can demonstrate product comparability following manufacturing/facility/equipment changes
- Develop animal models that can demonstrate proof-of concept and safety
- Demonstrate safety and efficacy in clinical trials

# A Poor Regulatory Strategy Has a Significant, Negative Financial Impact

## CAUSE

- ▼ Inadequate Animal Studies
- ▼ Inadequate Bench Testing
- ▼ Poor characterization
- ▼ Poor validation

- ▼ Clinical Study Delays
- ▼ Poor Enrollment
- ▼ Clinical Hold
- ▼ Clinical Supply Shortages



## EFFECT

### Private company:

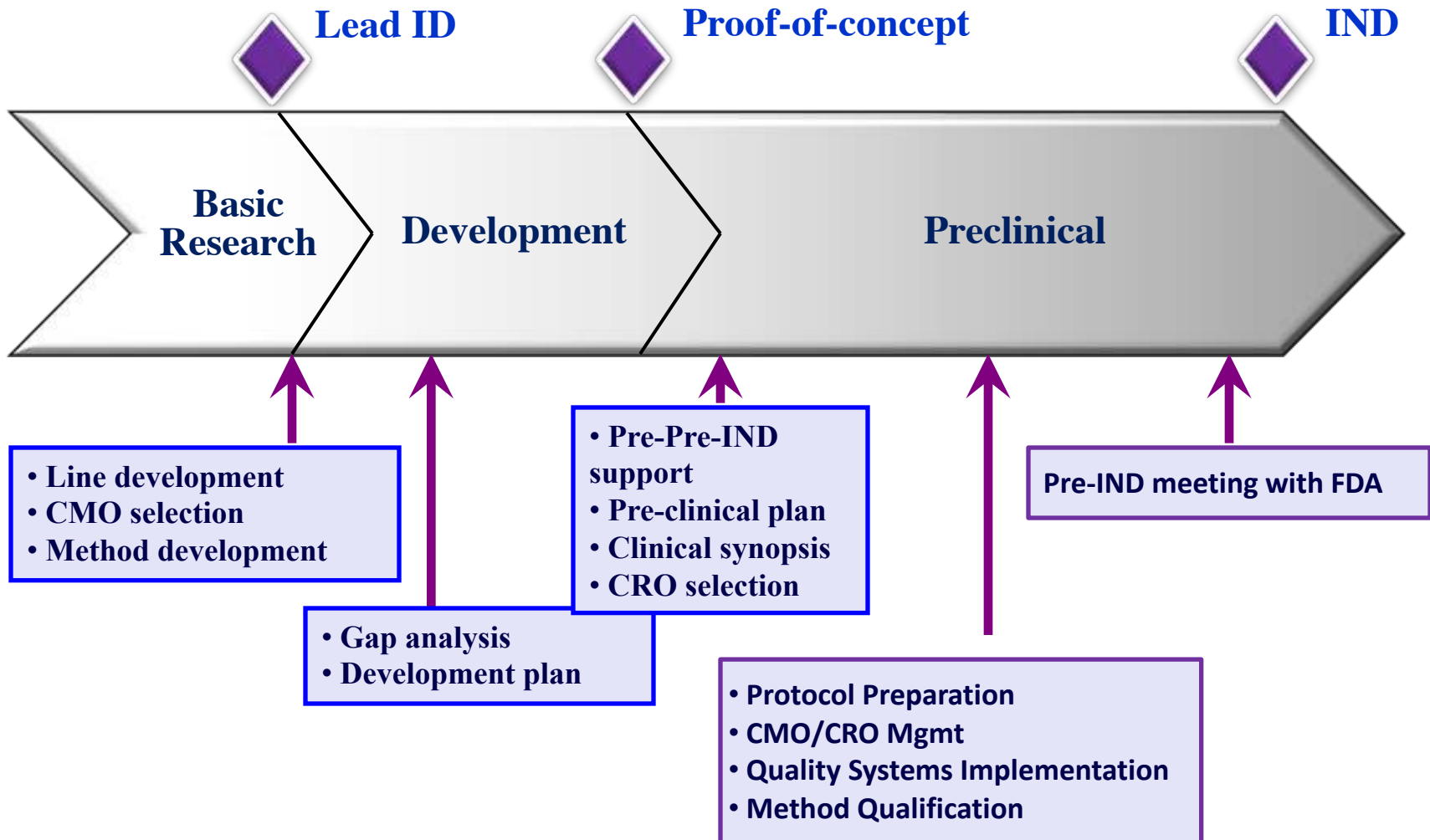
- Shut the doors
- Bridge financing may be needed
- IPO/M&A less likely

### Public company:

- Decreased market cap
- Secondary offerings less likely
- Loss of confidence by public markets

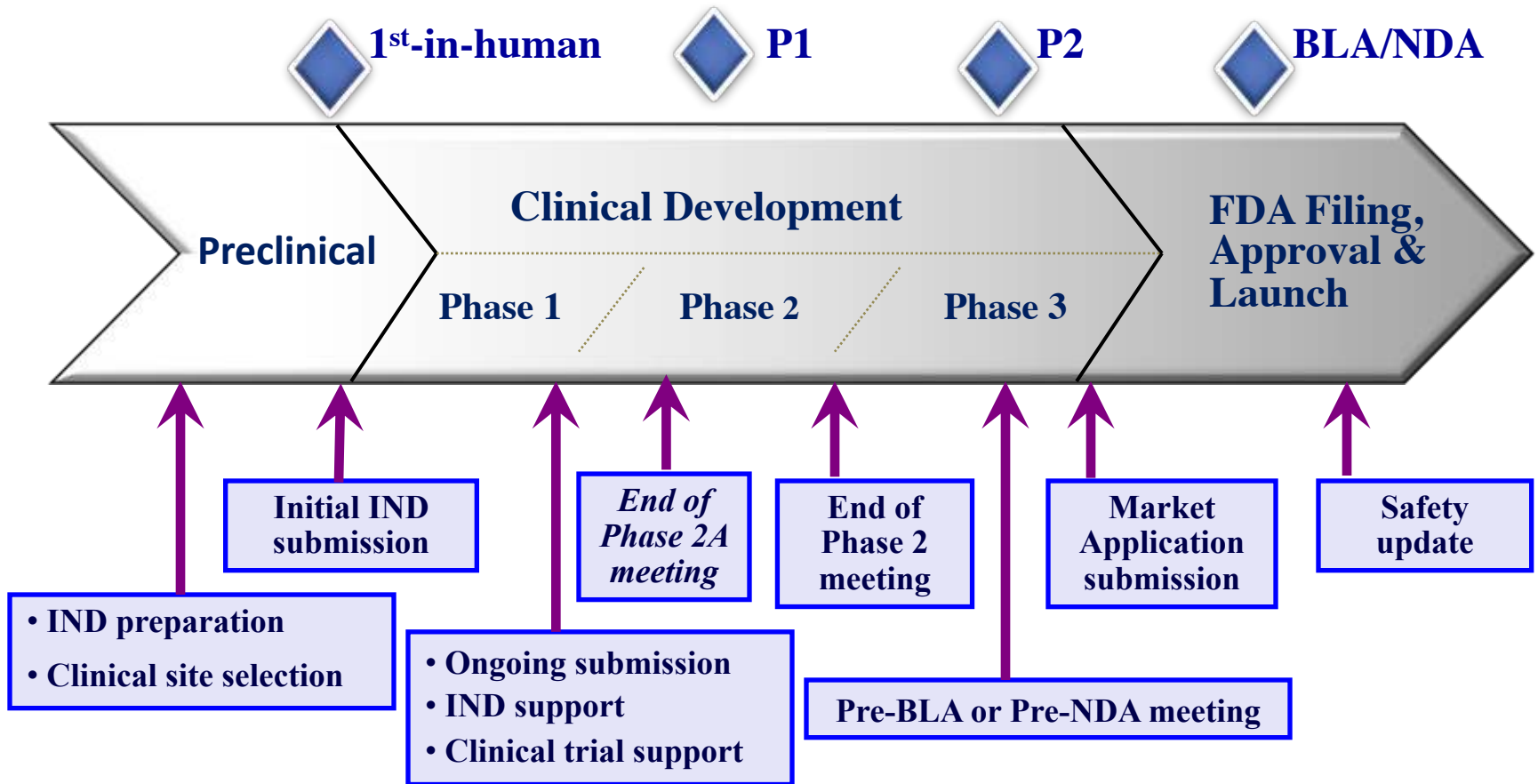
# Regulatory Affairs Impact

## Key Early Development Milestones



# Regulatory Affairs Impact

## Key Clinical Development Milestones



# FDA Expedited Review Pathways

## Accelerated Approval

- Approval of drugs/biologics for serious conditions that fill an unmet medical need based on a surrogate endpoint.

## Fast Track

- Review process designed to facilitate the development, and expedite the review of drugs to treat serious conditions and fill an unmet medical need.

## Breakthrough Therapy

- A designation designed to expedite the development and review of drugs which may demonstrate substantial improvement over available therapy.

## Priority Review

- A review designation whereby FDA's goal is to take action on an application within 6 months.

# Regulatory interactions and requirements

- Informal advice from friends at FDA
- Consultants and advisors
- Guidelines – and there are many
- Formal meetings with regulatory agencies



# US Regulatory Meetings

- Formalized program
- Guidance
- Some variation between review divisions
  
- INTERACT (aka Pre-Pre-IND in CBER)
- Pre-IND
- Post Phase 1 (End-of-Phase 1)
- Post Phase 2 (End-of-Phase 2)
- Pre Marketing Application (Pre-BLA, Pre-NDA)
- Others as needed

# US versus non-US development

## ➤ European Community

- Clinical trials can be submitted through National Competent Authorities (NCAs) or a single NCA
- Clinical trials submitted through single NCA starting Jan 31, 2023
- Meetings can be arranged to discuss product development issues
- In general, products are approved for marketing by EMA
  - Scientific advice from EMA on development issues such as the design of Phase 3 trials

## ➤ United Kingdom

- After Brexit, MHRA has sole responsibility for regulatory oversight
  - EU pharmaceutical law no longer in effect, except for Northern Ireland

# US versus non-US development

## ➤ Japan

- PMDA approves IND
- PMDA and Ministry of Health approves NDA

## ➤ Australia

- TGA is the regulatory agency
- TGA approves products for marketing
- Clinical trials
  - Approval system (CTX)
  - Notification system (CTN)

## ➤ India/China

- India: Central Drugs Standard Control Organization (CDSCO)
- China: National Medical Products Administration (NMPA)

# US versus non-US development

## ➤ South Africa

- South African Health Products Regulatory Authority (SAHPRA)

## ➤ Africa

- African Medicines Agency (AMA)
- 17 countries signed and ratified treaty
  - Rwanda, Mali, Burkina Faso, Seychelles, Namibia, Ghana, Guinea, Sierra Leone, Algeria, Benin, Niger, Zimbabwe, Mauritius, Gabon, Cameroon, Chad, Tunisia

# Acceptability of foreign clinical data

- ICH (adopted by FDA) has a guideline
  - In general foreign clinical data is acceptable but with caveats
  - Data may not be acceptable due to
    - Different medical practice and medicines
    - Different nutritional background
    - Different genetic backgrounds
  - FDA and other agencies have indicated that human data is not a substitute for comprehensive preclinical assessments

# What can go wrong?

- Murphy's law - What can go wrong will go wrong at the worst possible time.
  - But experience helps identify what should be done when and how
  - Cutting corners
- Manufacturing - GMP
- Preclinical Safety - GLP
- Clinical - GCP
- Regulatory

# Manufacturing

## ➤ GMP

- Some concessions for early clinical trials
- Need a qualified experienced person to assess compliance requirements

## ➤ Manufacturing contractors

- Compliance with GMP
- Qualify contractors by audit
- Monitor activities

## ➤ Examples of horror stories

- Sterility tests on Master and Working Cell banks
- Use of animal products
- Poor documentation
- Data integrity

# Preclinical safety

- Contractors
- Compliance with GLP
- Need for monitoring
- Examples of what can go wrong
  - For cause audit
  - Poor sample handling
  - Contractor retested at their expense



# Clinical

- Clinical Research Organizations (CROs)
- De-barred Investigators
- FDA audits
  - Falsification of qualifications
  - Source data verification
  - Not following inclusion/exclusion criteria
  - Adequate oversight of CRO by Sponsor
- Post hoc analysis of results

# Good Regulatory Planning

- Understand your product
- Understand the regulatory expectations
- Develop the Product Development Plan with regulatory expectations in mind
  
- Check everything and everyone
- Get advice from independent experienced people early and often!

# Product Development Planning

- Product Planning is critical to any organization, and a well-conceived and comprehensive *Product Development Plan (PDP)* can provide a detailed assessment of your product and the most effective pathway to licensure/approval.

# What is a Product Development Plan?

- A “roadmap” for your product’s development
- A concise, product-focused strategic document laying out the path to licensure/approval
- A detailed analysis of your product status and developmental requirements, including the four primary aspects of product development:  
Manufacturing, Preclinical, Regulatory and Clinical Development
- An integrated stand-alone document tying the four main areas of product development with budgets, tasks and timelines through Phase 1 or beyond

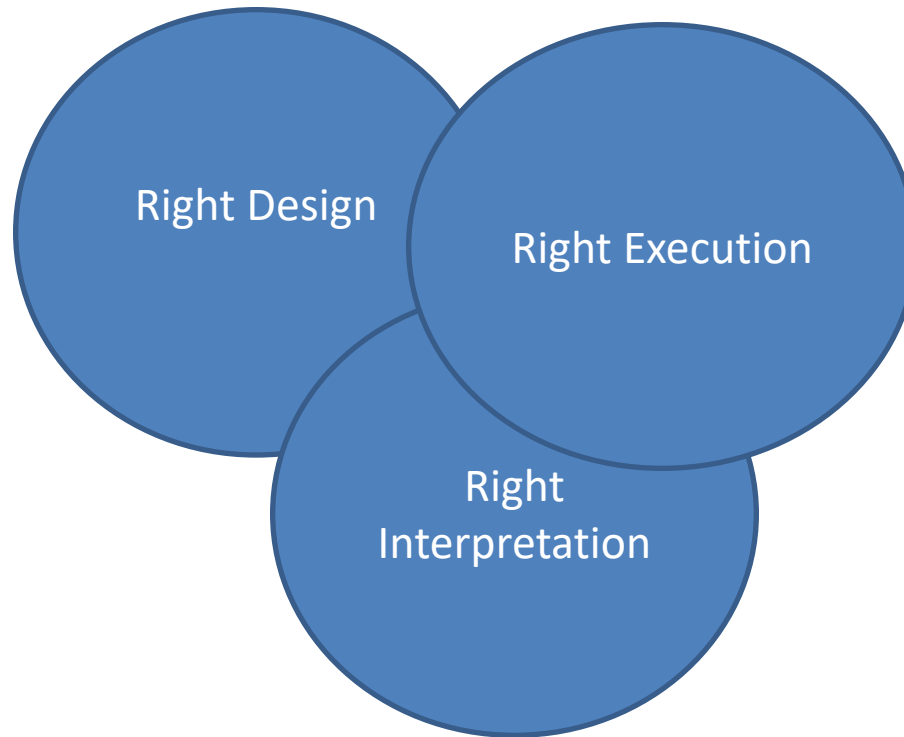
# Why Develop a Product Development Plan?

- Planning is crucial at every stage of development, particularly at the outset
- Provides a concise detailed analysis of your product and the roadmap to market
- Clearly states developmental objectives and crucial milestones
- Presents a single (or multiple, if desired) focused regulatory strategy for presenting your product to the FDA
- Presents strategies for dealing with potential roadblocks and hurdles in the product development process
- Lays out accurate and realistic budgets and timelines through clinical development

# Typical PDP Content

- Background and Product Assessment
- Manufacturing Development Plan
- Preclinical Development Plan
- Clinical Development Plan
- Regulatory Development
- Project Management
- Budget
- Timelines

# What you need for a successful PDP



# **Regulatory Impact during Pandemic**



# FDA Expedited Programs

- Expedited reviews
- Conditional approvals
- Emergency use
- Expanded access

# EMA Expedited Programs

- Rapid scientific advice
- Rolling reviews
- Emergency use
- Expanded access

# WHO Expedited Programs

➤ Emergency use

# FDA Programs

- Coronavirus Treatment Acceleration Program (CTAP)
- Operation Warp Speed (OWS)

# Facilitating Clinical Studies

- Some protocol changes without IRB or ethics committee approval – FDA guidance
- Some protocol changes based on risk based assessment by sponsor – EMA guidance
- Alternate approaches to safety monitoring when in-person or on-site visits unavailable

# Facilitating NDA/BLA/ANDA Approvals

- Not requiring inspections prior to approval
  - Remote GMP inspections
  - Facility compliance profile
  - BIMO inspections from document review

# **Biosimilar Products in the US**

# BPCI

- The Biologics Price Competition and Innovation Act of 2009 (BPCI Act) was passed as part of health reform (Affordable Care Act) that was signed into law on March 23, 2010
- BPCI Act creates an *abbreviated licensure pathway for biological products shown to be biosimilar to or interchangeable with* an FDA-licensed reference product



# Take Home Message

- The goal is to **demonstrate biosimilarity** between the proposed product and a reference product
- The goal is **not** to independently establish safety and effectiveness of the proposed product

# Definition

Biosimilar or Biosimilarity means:

- that the biological product is **highly similar** to the reference product notwithstanding minor differences in clinically inactive components; and
- there are **no clinically meaningful differences** between the biological product and the reference product in terms of the safety, purity, and potency of the product

# Definition

Reference Product means:

- the **single biological product, licensed under section 351(a) of the PHS Act,** against which a biological product is evaluated in an application submitted under section 351(k) of the PHS Act

*[A biological product, in a 351(k) application, may not be evaluated against more than 1 reference product]*

# Comparator Products

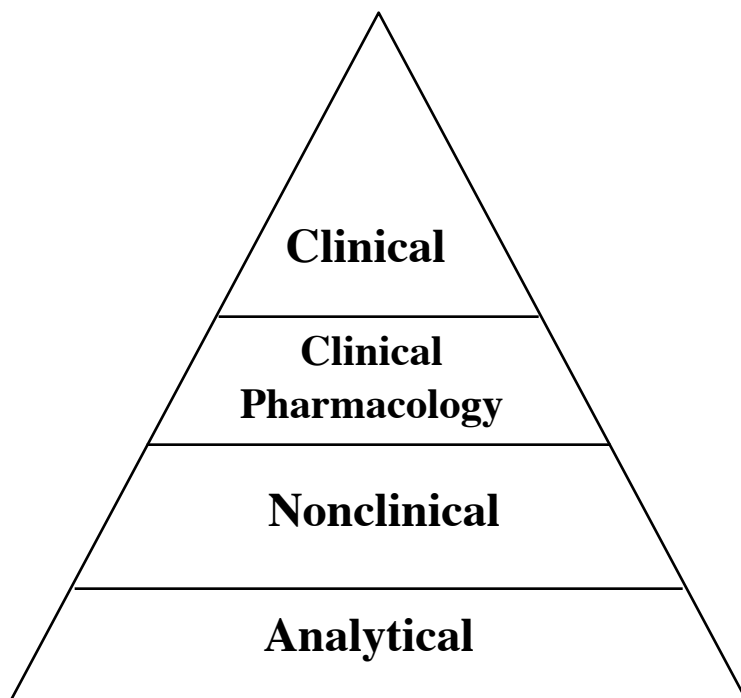
- The PHS Act defines the “reference product” for a 351(k) application as the “single biological product licensed under section 351(a) against which a biological product is evaluated.”
- Data from animal studies and certain clinical studies comparing a proposed biosimilar product with a non-US licensed product may be used to support a demonstration of biosimilarity to a US-licensed reference product
- Adequate data or information should be provided to **scientifically** justify the relevance of these comparative data to an assessment of biosimilarity and to **establish** an **acceptable bridge** to the U.S.-licensed reference product

# General Requirements

A 351(k) application must include information demonstrating that the biological product:

- Is **biosimilar** to a reference product;
- Utilizes the **same mechanism(s) of action** for the proposed condition(s) of use -- but only to the extent the mechanism(s) are known for the reference product;
- **Condition(s) of use** proposed in labeling have been **previously approved** for the reference product;
- Has the **same route of administration, dosage form, and strength** as the reference product; and
- Is manufactured, processed, packed, or held in a facility that **meets standards** designed to assure that the biological product continues to be safe, pure, and potent

# **Totality of Evidence**



FDA will consider the totality of the data and information submitted in the application

# Number of FDA Approved Biosimilars

Year	Number of Approvals	Reference Product Names
2022	3	Neulasta, Avastin, Neupogen
2021	4	Humira, Lantus, Lucentis
2020	3	Rituxan, Humira, Neulasta
2019	10	Remicade, Humira, Neulasta, Rituxan
2018	7	
2017	5	Remicade, Humira, Avastin, Herceptin
2016	3	Remicade, Enbrel, Humira
2015	1	Neupogen

# FDA Approved Biosimilar Products

Reference Product	Number of Biosimilars	Biosimilar Product Names
Avastin (bevacizumab)	3	Mvasi, Zirabev, Alymsys
Enbrel (etanercept)	2	Erelzi, Eticovo
Epogen/Procrit (epoetin alfa)	1	Retacrit
Herceptin (trastuzumab)	5	Ogivri, Herzuma, Ontruzant, Trazimera, Kanjinti
Humira (adalimumab)	7	Amjevita, Cyltezo, Hyrimoz, Hadlima, Abrilada, Hulio, Yusimry
Lantus (insuline glargine)	2	Semglee, Rezvoglar
Lucentis (ranibizumab)	1	Byooviz



# FDA Approved Biosimilar Products

Reference Product	Number of Biosimilars	Biosimilar Product Names
Neulasta (pegfilgrastim)	5	Fulphila, Udenyca, Ziextenzo, Nyvepria, Fylnetra
Neupogen (filgrastim)	3	Zarxio, Nivestym, Releuko
Remicade (infliximab)	4	Inflectra, Renflexis, Ixifi, Avsola
Rituxan (rituximab)	3	Truxima, Ruxience, Riabni

# Summary

- Regulatory Compliance is Critical to Success
  - If the FDA does not approve it you cannot test it in humans and you cannot sell it
- Achieving Regulatory Compliance is not simple
  - It requires a significant dedication of resources by product development specialists who have expertise with your product type
- A Rigorous PDP will provide a roadmap to efficient development and speedy approval
- Positive impact on regulatory agencies from COVID-19 pandemic
- Biosimilar development pathway has legally been in place in the US since 2010 and has led to the licensure of 36 BLAs for biosimilar products

**Thank You**

**ADDITIONAL SLIDES**

# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Zarxio (filgrastim-sndz)	Neupogen	3/6/15	Sandoz
Inflectra (infliximab-dyyb)	Remicade	4/05/16	Celltrion
Erelzi (etanercept-szzs)	Enbrel	8/30/16	Sandoz
Amjevita (adalimumab-atto)	Humira	9/23/16	Amgen
Renflexis (infliximab-abda)	Remicade	4/21/17	Samsung Bioepis

Current as of May 31, 2022

# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Cyltezo (adalimumab-adbm)	Humira	8/25/17	Boehringer Ingelheim
Mvasi (bevacizumab-awwb)	Avastin	9/14/17	Amgen
Ogivri (trastuzumab-dkst)	Herceptin	12/1/17	Mylan GmbH
Ixifi (infliximab-qbtx)	Remicade	12/13/17	Pfizer
Retacrit (epoetin alfa-epbx)	Epogen	5/15/18	Pfizer (Hospira)

# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Fulphila (pegfilgrastim-jmdb)	Neulasta	6/4/18	Mylan GmbH
Nivestym (filgrastim-aafi)	Neupogen	7/20/18	Pfizer
Hyrimoz (adalimumab-adaz)	Humira	10/31/18	Sandoz
Udenyca (pegfilgrastim-cbqv)	Neulasta	11/2/18	Coherus Biosciences
Truxima (rituximab-abbs)	Rituxan	11/28/18	Teva

# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Herzuma (trastuzumab-pkrb)	Herceptin	12/14/18	Teva
Ontruzant (trastuzumab-dttb)	Heceptin	1/18/19	Samsung Bioepis
Trazimera (trastuzumab-qyyp)	Heceptin	3/11/19	Pfizer
Eticovo (etanercept-ykro)	Enbrel	4/25/19	Samsung Bioepis
Kanjinti (trastuzumab-anns)	Herceptin	6/13/19	Amgen
Zirabav (bevacizumab-bvzr)	Avastin	6/27/19	Pfizer



# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Ruxience (rituximab-pvvr)	Rituxan	7/23/19	Pfizer
Hadlima (adalimumab-bwwd)	Humira	7/23/19	Samsung Bioepis
Ziextenzo (pegfilgrastim-bmez)	Neulasta	11/4/19	Sandoz
Abrilada (adalimumab-afzb)	Humira	11/15/19	Pfizer
Avsola (infliximab-axxq)	Remicade	12/6/19	Amgen

# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Nyvepria (pegfilgrastim-apgl)	Neulasta	6/10/20	Pfizer
Hulio (adalimumab-fkjp)	Humira	7/6/20	Mylan
Riabni (rituximab-arrx)	Rituxan	12/17/20	Amgen
Semglee (insulin glargine-yfgn)	Lantus	7/28/21	Mylan
Byooviz (ranibizumab-nuna)	Lucentis	9/17/21	Samsung Bioepis
Rezvoglar (insulin glargine-aglr)	Lantus	12/17/21	Eli Lilly
Yusimry (adalimumab-aqvh)	Humira	12/17/21	Coherus

# FDA Approved Biosimilars

Biosimilar Product	Reference Product	Approval Date	Applicant
Releuko (filgrastim-ayow)	Neupogen	2/25/22	Kashiv
Alymys (bevacizumab-maly)	Avastin	4/14/22	Amneal
Fylnetra (pegfilgrastim-pbbk)	Neulasta	5/27/22	Kashiv