### **Laboratory Outreach Communication System (LOCS) Call**

Monday, November 13, 2023, at 3:00 P.M. ET

- Welcome
  - Jasmine Chaitram, CDC Division of Laboratory Systems
- SARS-CoV-2 Variants Update
  - Natalie Thornburg, CDC Coronavirus and Other Respiratory Viruses Division
- Emergency Use Authorizations for In Vitro Diagnostics
  - Kim Sapsford-Medintz, U.S. Food and Drug Administration
- Brucella What's New: Changes and Challenges
  - Kurt Jerke, U.S. Army
- An Upgrade for the LOCS Website: New Search and Filter Functionality
  - James Bratton, CDC Division of Laboratory Systems

### **About DLS**



# **Four Goal Areas**



### Quality Laboratory Science

 Improve the quality and value of laboratory medicine for better health outcomes and public health surveillance



Highly Competent Laboratory Workforce

 Strengthen the laboratory workforce to support clinical and public health laboratory practice



Safe and Prepared Laboratories

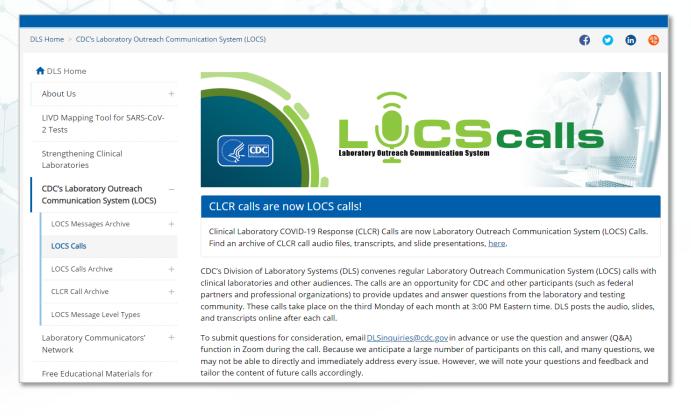
 Enhance the safety and response capabilities of clinical and public health laboratories



# Accessible and Usable Laboratory Data

 Increase access and use of laboratory data to support response, surveillance, and patient care

# **LOCS Calls**



#### On this page, you can find:

- LOCS Call information
- Transcripts
- Slides
- Audio Recordings

https://www.cdc.gov/locs/calls

# We Want to Hear From You!

# **Training and Workforce Development**

Questions about education and training?

Contact <u>LabTrainingNeeds@cdc.gov</u>





# Fundamentals of Communicating the Hazards of Laboratory Chemicals

This basic level course is designed for public health and clinical laboratory staff, safety professionals, and others who work in laboratories where hazardous chemicals are routinely used and stored. It introduces OSHA Standards and their role in providing information to laboratory staff.

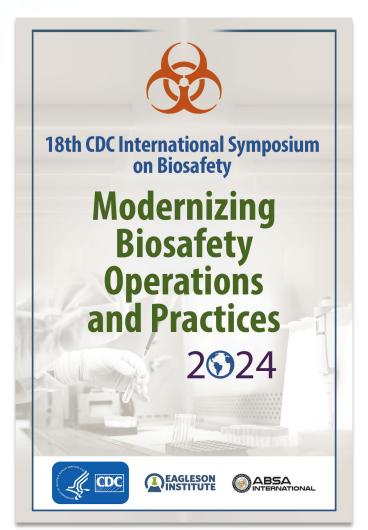


P.A.C.E.® credit
This course is 1 contact hour(s)

# **CDC International Symposium on Biosafety**

- March 10-14, 2024
- Crowne Plaza Ravinia, Atlanta, GA
- The symposium will provide sessions about modernizing biosafety operations and practices, focused on the areas of Clinical Care, Public Health, Research, and Animal Care

https://www.eagleson.org/conferences/cdc-international-biosafety-symposium/



# How to Ask a Question

- Using the Zoom Webinar System
  - Click the Q&A button in the Zoom webinar system
  - Type your question in the Q&A box and submit it
  - Please do not submit a question using the chat button



- For media questions, please contact
   CDC Media Relations at <a href="media@cdc.gov">media@cdc.gov</a>
- If you are a patient, please direct any questions to your healthcare provider

### **Division of Laboratory Systems**

Slide decks may contain presentation material from panelists who are not affiliated with CDC. Presentation content from external panelists may not necessarily reflect CDC's official position on the topic(s) covered.



### **Division of Laboratory Systems**

# SARS-CoV-2 Variants Update

Natalie Thornburg, PhD

CDC Coronavirus and Other Respiratory Viruses Division





# **Emergency Use Authorizations for IVDs**

Kim Sapsford-Medintz
FDA/CDRH/OHT7-OIR/DMD
Kim.Sapsford@fda.hhs.gov

### **Overview**



- O Why are EUAs Needed?
- EUA Authority and Criteria
- EUA Versus Traditional Marketing Submissions
- EUA Documentation
- Post EUA

# Why are Legal/Regulatory Mechanisms for Emergency Use of Medical Products Needed?

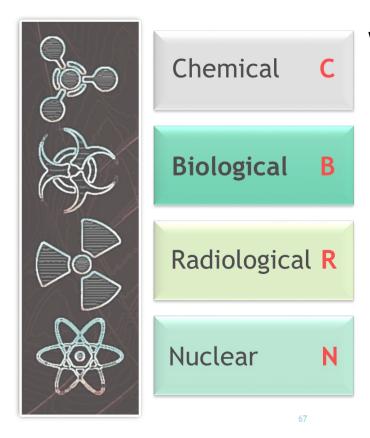


Without legal mechanisms, certain preparedness and response activities could otherwise violate provisions of the Federal Food, Drug, and Cosmetic (FD&C) Act:

- Products needed for a response might not be approved, licensed, or cleared by FDA
- Products needed for a response might be approved by FDA, but not for the emergency use (e.g., for a new indication)
- Ensures any available HHS Public Readiness and Emergency Preparedness (PREP) Act protections apply
- Facilitates Import or Export and distribution of the product.
- Facilitates pre-positioning of MCM products for emergency use upon authorization

# **EUA Authority (FD&C Act § 564)**





With an EUA, FDA can authorize:

- ➤ Use of unapproved Medical Counter Measures (MCMs) (despite lacking the amount of data that would be necessary for approval)
- ➤ Unapproved use of approved MCMs (e.g., for a new indication)

to diagnose, treat, or prevent serious or lifethreatening diseases or conditions caused by CBRN threat agents when certain criteria and prerequisites are met

In addition, DoD may issue a determination based on 'an agent or agents that may cause, or are otherwise associated with, an imminently lifethreatening and specific risk to United States military forces'

# **EUA Pre-Requisites: Determination and Declaration**



#### DOD SECRETARY

Determination of Military Emergency or Significant Potential for Military Emergency

OR

#### DHS SECRETARY

Determination of Domestic Emergency or Significant Potential for Domestic Emergency

#### **HHS SECRETARY**

Determination of Public Health Emergency or Significant Potential for Public Health Emergency DHS SECRETARY

OR

Identification of Material Threat

In the case of a DOD determination, the HHS Secretary shall determine within 45 days whether to issue an EUA declaration

#### HHS SECRETARY

OR

Declaration that Circumstances Exist Justifying the EUA

#### FDA COMMISSIONER

Issuance of EUA (if criteria for issuance met)

Termination of Declaration & EUA

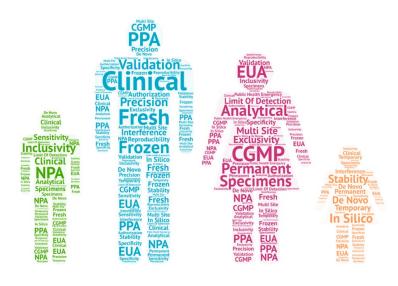
Consultation with ASPR, CDC, NIH

### **EUA Criteria**



- O Main Criteria:
  - > Serious or life-threatening disease or condition caused by an agent
  - > Based on totality of scientific evidence, reasonable belief:
    - o Product may be effective
    - Known/potential benefits outweigh known/potential risks (Each product is assessed independently, based on circumstances at time of request)
  - ➤ No adequate, approved, available alternative to the product





Nucleic Acid Amplification Test (NAAT)	De novo or 510(k)	Emergency Use Authorization (EUA)
Limit of Detection (LoD)	Yes	?
Inclusivity	Yes Some <i>in silico</i>	?
Exclusivity	Yes Some <i>in silico</i>	?
Interference	Yes	?ider
Precision/Repro.	Precision: Yes – Single-site/within site Repro.: Yes – Multi-site	cientific ?
Fresh vs. Frozen	Fresh specimens preferred	cie <sup>*</sup> ?
Specimen Stability	Yes	?
Reagent Stability	Yes	?
Clinical Evaluation	Yes – natural clinical specimens	?

Nucleic Acid Amplification Test (NAAT)	De novo or 510(k)	Emergency Use Authorization (EUA)
Limit of Detection (LoD)	Yes	Yes
Inclusivity	Yes Wet testing, plus some <i>in silico</i>	Yes - Technology dependent - in silico acceptable if applicable
Exclusivity	Yes Wet testing, plus some <i>in silico</i>	Limited - Technology dependent - in silico acceptable if applicable
Interference (Substances and microbiol.)	Yes	Technology specific – not always required if technology includes an extraction step for example
Precision/Repro.	Precision: Yes – Single-site/within site Repro.: Yes – Multi-site	No
Fresh vs. Frozen	Fresh specimens preferred	Fresh specimens preferred
Specimen Stability	Yes	Depends – needed if claims are outside of CDC recommendations
Reagent Stability	Yes	No – However, study design required
Clinical Evaluation	Yes – natural clinical specimens – prospective multi-site clinical study	Limited – natural clinical specimens if available at the time

# FDA

#### EUA Fact Sheets:

- > The EUA Fact Sheets pertain to the emergency use of the product and outline the associated benefits and risks associated with its use
- ➤ FDA typically develop Healthcare Provider/Professional or other authorized dispenser and Patient/Recipient Fact Sheet templates specific to the PHE and will share these with test/kit developers during the review of their EUA submission

# Manufacturer Package Insert/Instructions for Use/EUA Summary/Standard Operating Procedures:

- > Described how to perform the test and/or use the EUA product
- > Summarizes the analytical and clinical performance FDA used to assess the benefit risk of the EUA product in its intended use

#### **EUA Documents:**

EUA Review Template

- Fact Sheets –
   Healthcare Providers
   and Patients, others
- Manufacturer Package Insert/Instructions for Use/EUA Summary
- Letter of Authorization



#### o Letter of Authorization:

- > The Letter of Authorization authorizes the emergency use of the test and allows the test to be distributed in the U.S.
- > The letter includes the criteria for issuance of authorization and the scope of authorization.
- > The letter includes the Conditions of Authorization that are required to be met by the applicable parties.
  - > Manufacturer
  - ➤ Distributors includes 3<sup>rd</sup> party
  - > Laboratories
  - > Others

#### **EUA Documents:**

EUA Review Template

- Fact Sheets –
   Healthcare Providers and Patients, others
- Manufacturer Package Insert/Instructions for Use/EUA Summary
- Letter of Authorization



#### o Letter of Authorization:

- > The letter can also include (if applicable) the waiver of certain requirements otherwise required by applicable federal law.
  - ➤ Current good manufacturing practice requirements, including the quality system requirements under 21 CFR Part 820 with respect to the design, manufacture, packaging, labeling, storage, and distribution of your product, but excluding Subpart H (Acceptance Activities, 21 CFR 820.80 and 21 CFR 820.86), Subpart I (Nonconforming Product, 21 CFR 820.90), and Subpart O (Statistical Techniques, 21 CFR 820.250).

#### **EUA Documents:**

EUA Review Template

- Fact Sheets –
   Healthcare Providers
   and Patients, others
- Manufacturer Package Insert/Instructions for Use/EUA Summary
- Letter of Authorization



#### Letter of Authorization - Conditions of Authorization:

- > Distribution of the EUA product, manufacturing and labeling
- > Registration and listing requirements
- > Outlines how changes to the EUA product can be requested and made
- > Reporting of test results and adverse events
- Outlines certain content required for descriptive printed matter, advertising, and promotional materials
- Outlines required post-authorization studies that the test-developer must complete or agree to as a condition of authorization
  - > Real-time reagent stability studies
  - > Re-evaluation of analytical or clinical studies
  - > Submitting the product for an independent evaluation
  - > Testing of a recommended reference material
  - > Continued evaluation of microorganism mutations
- It is important for all parties involved in the manufacture, distribution, and use of the authorized product to be familiar with the content of the Letter of Authorization and associated Conditions of Authorization.

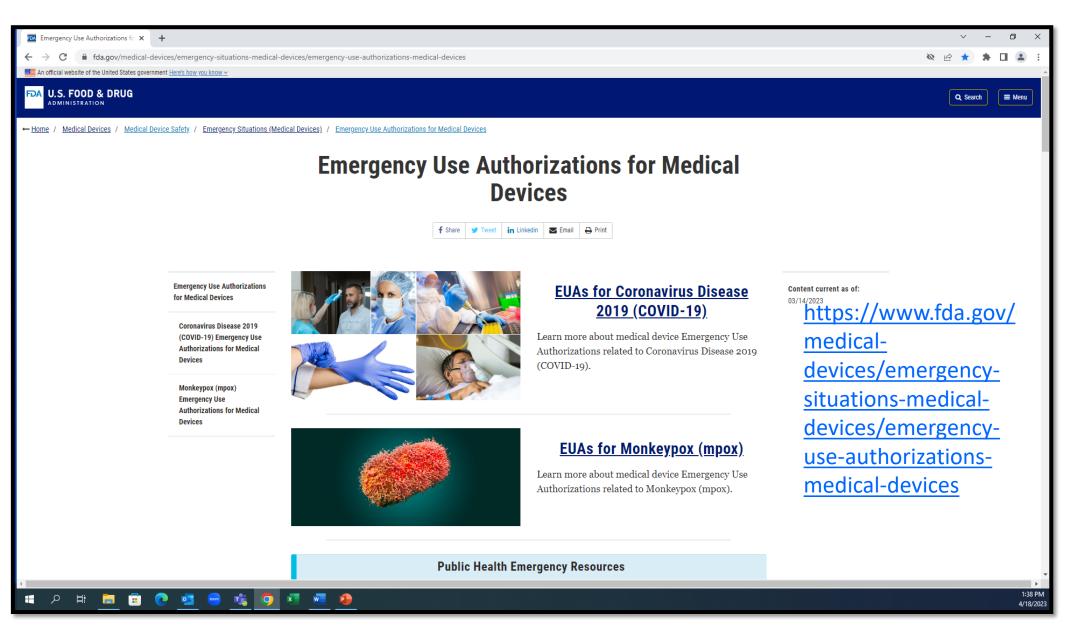
#### **EUA Documents:**

EUA Review Template

- Fact Sheets –
   Healthcare Providers
   and Patients, others
- Manufacturer Package Insert/Instructions for Use/EUA Summary
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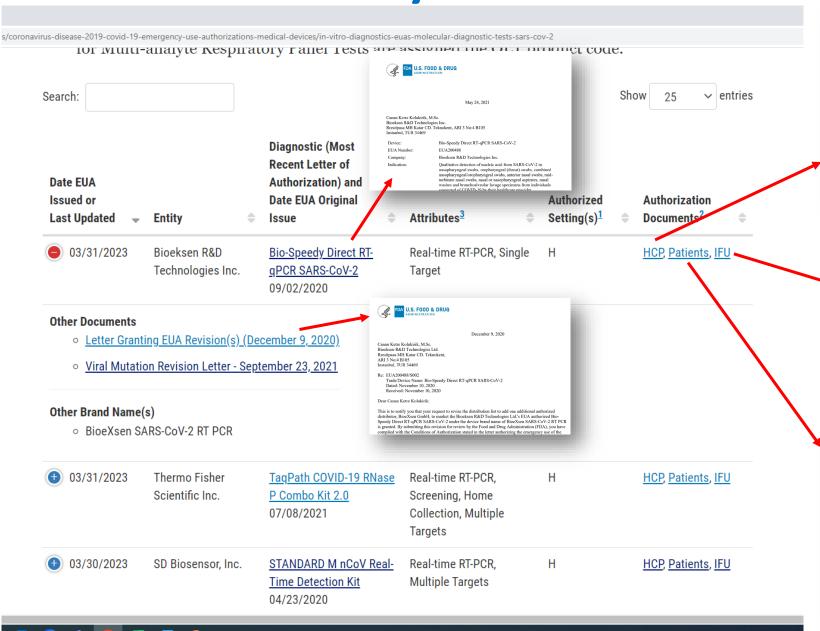
# Information Publicly Available on FDA Website





# Information Publicly Available on FDA Website





#### **FACT SHEET FOR HEALTHCARE PROVIDERS**

Bioeksen R&D Technologies Inc. (Bioeksen AR GE Teknolojileri A.Ş.) Updated: March 31, 2023 (COVID-19) Bio-Speedy Direct RT-qPCR SARS-CoV-2

Disease 2019

This Fact Sheet informs you of the significant known and potential risks and benefits of the emergency use of the Bio-Speedy Direct RT-qPCR SARS-CoV-2.

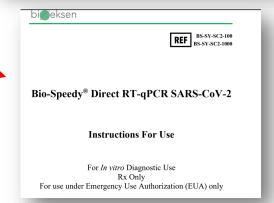
The Bio-Speedy Direct RT-qPCR SARS-CoV-2 is authorized for use with nasopharyngeal swabs, oropharyngeal (throat) swabs, combined nasopharyngeal/oropharyngeal swabs, anterior nasal swabs, mid-turbinate nasal swabs, nasal or nasopharyngeal aspirates, nasal washes and bronchoalveolar lavage samples collected from individuals suspected of COVID-19 by their healthcare This test is to be performed only using nasopharyngeal swabs, oropharyngeal (throat) swabs, combined nasopharyngeal/oropharyngea swabs, anterior nasal swabs, mid-turbinate nasal swabs, nasal or nasopharyngeal aspirates, nasal washes and bronchoalveolar lavage samples collected from individuals suspected of COVID-19 by their healthcare provider.

section at the end of this document) or your local jurisdictions website for the most up to date information

All patients whose specimens are tested with this assay will receive the Fact Sheet for Patients: Bioeksen R&D Technologies Inc. (Bioeksen AR GE Teknolojileri A.S.) - Bio-Speedy Direct RT-qPCR SARS-CoV-2.

What do I need to know about COVID-19 testing? Current information on COVID-19 for healthcare roviders is available at CDC's webpage, Information for Healthcare Professionals (see links provided in "Where

The Bio-Speedy Direct RT-qPCR SARS-CoV-2 car



#### **FACT SHEET FOR PATIENTS**

Bioeksen R&D Technologies Inc. (Bioeksen AR GE Teknolojileri A.Ş.) Bio-Speedy Direct RT-qPCR SARS-CoV-2 Updated: March 31, 2023 Coronavirus Disease 2019 (COVID-19)

You are being given this Fact Sheet because your sample(s) was tested for the Coronavirus Disease 2019 (COVID-19) using the Bio-Speedy Direct RT-qPCR

This Fact Sheet contains information to help you understand the risks and benefits of using this test for the diagnosis of COVID-19. After reading this Fact Sheet, if you have guestions or would like to discuss the information provided, please talk to your healthcare

For the most up to date information on COVID-19

please visit the CDC Coronavirus Disease 2019

(COVID-19) webpage:

https://www.cdc.gov/COVID

Why was my sample tested?

You were tested because your healthcare provider believes you may have been exposed to the virus that causes COVID-19 based on your signs and symptoms (e.g., fever, cough, difficulty breathing), and/or because

The test is designed to detect the virus that causes COVID-19 in the following respiratory specimens:

combined nasopharyngeal/oropharyngeal swabs. anterior nasal swabs, mid-turbinate nasal swabs, nasal

or nasopharyngeal aspirates, nasal washes and

nasopharyngeal swabs, oropharyngeal (throat) swabs,

- where transmission of COVID-19 is known to occur
- You have been in close contact with an individual suspected of or confirmed to have COVID-19



### **Post EUA**



#### FDA's role once an entity is issued an EUA:

- Follow up quickly with manufacturers if potential issues with performance are observed e.g., false positive or false negative
- Monitor supply and device usage as applicable
- Effectively authorize modifications to EUA through Supplements (e.g., new specimen types, instruments) – either trigger a re-issue of the EUA or are granted at the Division level.
- Follow up on reports of misuse of test and/or fraudulent claims
- EUA revocations posted on the FDA Historical webpage
- 564 Declaration Terminations



# Thank You!

#### **Resources:**

- o CDRH EUA Page: <a href="https://www.fda.gov/medical-devices/emergency-situations-medical-devices/emergency-use-authorizations-medical-devices">https://www.fda.gov/medical-devices/emergency-situations-medical-devices/emergency-use-authorizations-medical-devices</a>
- FDA EUA Page: <a href="https://www.fda.gov/emergency-preparedness-and-response/mcm-legal-regulatory-and-policy-framework/emergency-use-authorization">https://www.fda.gov/emergency-preparedness-and-response/mcm-legal-regulatory-and-policy-framework/emergency-use-authorization</a>
- o CDRH COVID IVD EUA Page: <a href="https://www.fda.gov/medical-devices/covid-19-emergency-use-authorizations-medical-devices/in-vitro-diagnostics-euas">https://www.fda.gov/medical-devices/covid-19-emergency-use-authorizations-medical-devices/in-vitro-diagnostics-euas</a>
- CDRH Mpox IVD EUA Page: <a href="https://www.fda.gov/medical-devices/emergency-use-authorizations-medical-devices/monkeypox-mpox-emergency-use-authorizations-medical-devices/emergency-us
- o CDRH Historical EUA Webpage: <a href="https://www.fda.gov/medical-devices/emergency-use-authorizations-medical-devices/historical-information-about-device-emergency-use-authorizations">https://www.fda.gov/medical-devices/emergency-use-authorizations</a> devices/historical-information-about-device-emergency-use-authorizations
- o CDRH Device Databases: <a href="https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/medical-device-databases">https://www.fda.gov/medical-devices/device-advice-comprehensive-regulatory-assistance/medical-device-databases</a>

COVID-19 Product Codes	De Novo and 510k Products
QOF	Multi-Target Respiratory Specimen Nucleic Acid Test Including Sars-Cov-2 And Other Microbial Agents
	Simple Point-Of-Care Device To Detect Sar-Cov-2 Nucleic Acid Targets From Clinical Specimens In Near-Patient
QWR	Settings
QQX	Respiratory Specimen Nucleic Acid Sars-Cov-2 Test
	Simple Point-Of-Care Device To Directly Detect Sars-Cov-2 Viral Targets From Clinical Specimens In Near-
QVF	Patient Settings
QVP	Sars-Cov-2 Serology Test
QWB	Over-The-Counter Molecular Test To Detect Sars-Cov-2 From Clinical Specimens



What's New: Changes and Challenges

Laboratory Outreach Communication System November 13<sup>th</sup>, 2023

Kurt Jerke, Ph.D., D(ABMM)





### Disclosure

 The views and opinions expressed or implied in this presentation are solely those of the authors and should not be construed as policy or carrying the official sanction of the United States Army, the Department of Defense, United States Military Academy, or other agencies or departments of the US government.



### Outline

- Select agent species
- Reclassification of Ochrobactrum to Brucella
- Updates to the ASM-APHL Sentinel Level Guidelines
- Gram stain and misidentification
- Questions



# Select Agent *Brucella S*pecies

- Gram-negative coccobacilli (0.4 x 0.8 μM)
- Causative agent of brucellosis
- Zoonotic bacteria
  - B. melitenensis\* Sheep and Goats
  - B. suis\* Pigs, hares, wild rodents
  - B. abortus\* Cattle
  - B. canis Dogs
  - \* Classified as a biological select agent



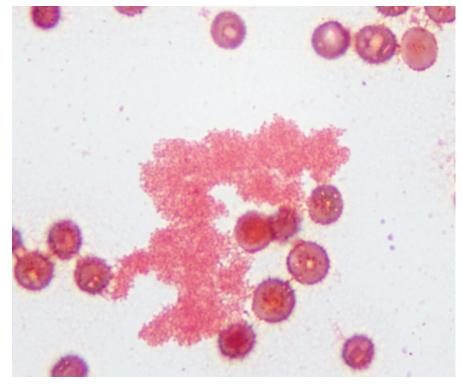


Photo courtesy of Erin McElvania

# Select Agent Brucella Species

- Brucellosis
  - O Acute disease -fever, headache, myalgia, arthralgia
  - Chronic disease recurrent fever, fatigue, joint pain
- Low infectious dose (10 to 100 microorganisms)
- Routes of exposure
  - Laboratory
  - Food
  - Animal (occupational and recreation)



# Taxonomic Changes

- Ochrobactrum genus designated in 1988
  - O Non enteric, aerobic Gram negative rods, **motile**, acid from several carbohydrates
  - Environmental organisms Soil, water, plants, animals
  - Opportunistic pathogen, generally low virulence
- In 2020 Hordt et. al proposed reclassifying Ochrobactrum to the genus Brucella based on genome analysis
- Both the original Ochrobactrum and Brucella species names are currently considered valid
- Brucella (Ochrobactrum) species do not cause brucellosis and are **not** classified as biological select agents



# Considerations and Implications

#### Reporting

- Both nomenclature are still considered valid
- CAP requires taxonomic updates under certain conditions (MIC.11375)
  - Labs should ensure the correct antimicrobial susceptibility breakpoints are applied to each organism
- Important to communicate with clinical staff
  - Brucella (Ochrobactrum) does not cause brucellosis
  - Is not a select agent (must rule out select agent Brucella species)



# Considerations and Implications

- Antimicrobial Susceptibility Testing
  - Refer possible select agent species to a LRN reference lab
  - Brucella (Ochrobactrum): if following CLSI standards, apply "Other Non-Enterobacterales" methods and interpretations
- Biosafety Requirements
  - Select agent Brucella species require BSL-3 or BSL-2 w/ BSL-3 precautions
  - Brucella (Ochrobactrum) can be handled safely using standard BSL-2 precautions



# Updates to the ASM-APHL Sentinel Guidelines

- Common characteristics that differentiate Brucella (Ochrobactrum) from select agent Brucella species
  - Rapid growth on MacConkey
  - Mucoid colony morphology
  - Positive motility (tube based)
- Revised guidelines under final review by ASM and APHL
- Thank you to both organizations for their work

### 48 Hour **Cultures**

Brucella melitensis

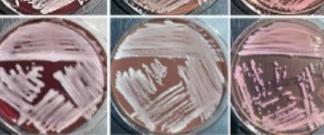
Brucella (Ochrobactrum) antropi











Photos courtesy of Ryan Relich



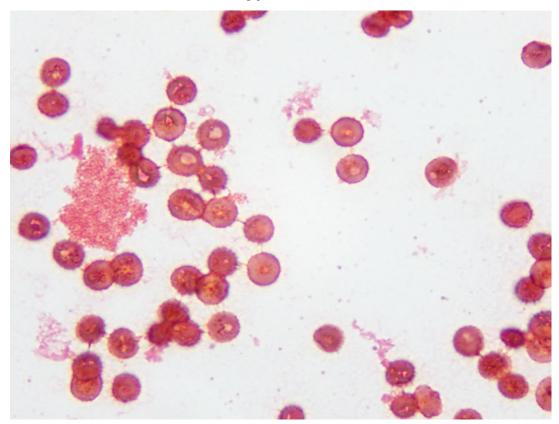
### **Gram Stain Misidentification**

- Recent reports of *Brucella* staining Gram positive
  - One Case reported from WA, B. melitensis (2019)
  - Two cases from RI, B. melitensis, B. abortus (2022)
  - Three cases from NY, B. melitensis (2), B. abortus (2020)
  - One case from Saudi Arabia Brucella species (2017)
- All specimens were blood culture
  - Time to detection typically 24 to 96 hrs
  - Gram stain from bottle reported as Gram positive rods or cocci
  - Subcultures were Gram variable or Gram negative



# Gram Stain Reaction and Morphology May be Atypical

#### **Typical**



#### Typical Morphology:

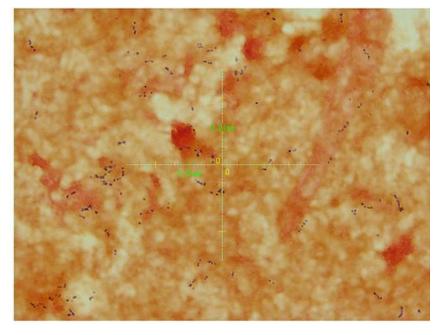
- Small coccobacilli
- Gram negative
- Often aggregate



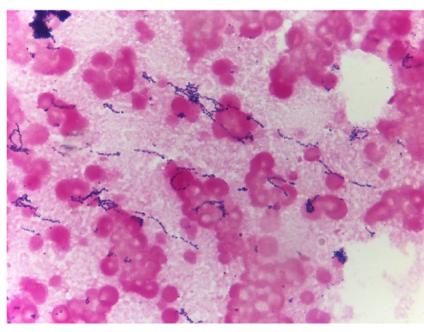
Photo courtesy of Erin McElvania

# Gram Stain Reaction and Morphology May be Atypical

**Atypical** 



#### **Atypical**



#### Atypical Morphologies:

- Coccobacilli to rods
- Gram variable or gram positive
- Singles, pairs, or chains
- Aggregates may not be seen

Photos from Ackelberg et al. doi.org/10.1128/JCM.01096-19.



### **Gram Stain Misidentification**

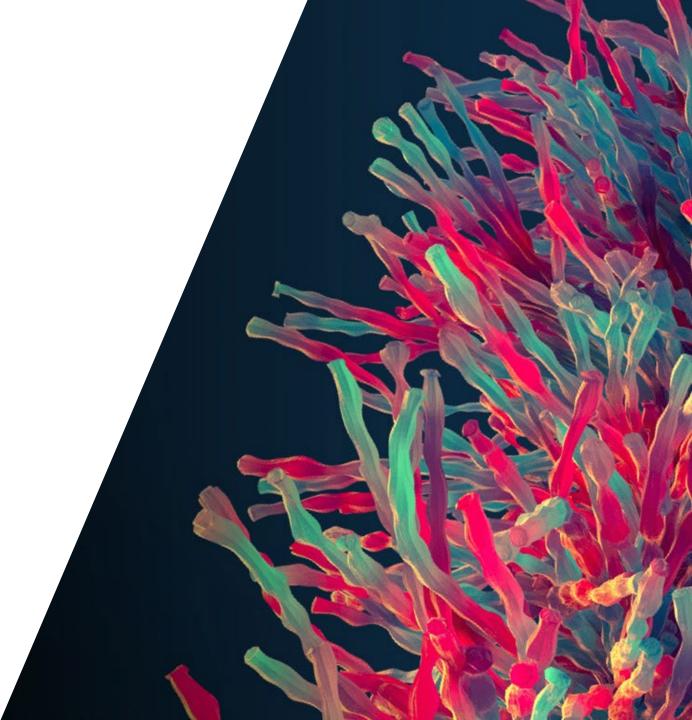
- Highlights importance of communication between laboratory and clinicians
- Education and training for laboratory staff
- Reconsider laboratory processes
  - Manipulation of all slow growing organisms in a biological safety cabinet



### **Thank You!**

Questions? Contact Us.

- kurt.jerke@westpoint.edu
- LTC Kurt Jerke
- Department of Chemistry and Life Science
- United States Military Academy
- 753 Cullum RD, Bartlett Hall
- West Point, NY 10996



### **Division of Laboratory Systems**

# An Upgrade for the LOCS Website: New Search and Filter Functionality

James Bratton, MA CDC Division of Laboratory Systems



# **LOCS Website Upgrade**

- Earlier this autumn, the Division of Laboratory Systems added search and filter functions to the website
- These new functions make it easier to search through the more than 300 LOCS messages archived on our website
- Messages date back to the website's inception, in 2017
- To contact us about the website, please email <a href="LOCS@cdc.gov">LOCS@cdc.gov</a> with the subject line "LOCS website feedback"
- https://www.cdc.gov/locs/index.html



Monday, December 18 3 PM - 4 PM EDT



https://www.cdc.gov/locs/calls

# **CDC Social Media**

https://www.facebook.com/CDC





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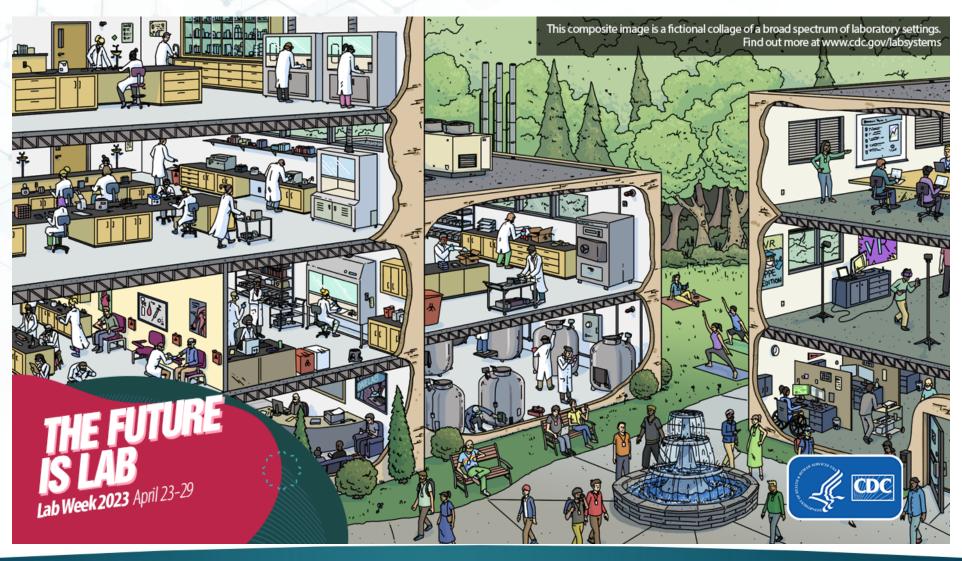
https://www.instagram.com/cdcgov





https://www.linkedin.com/company/cdc

# **Thank You For Your Time!**





For more information, contact CDC 1-800-CDC-INFO (232-4636) TTY: 1-888-232-6348 www.cdc.gov

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