

The Honorable Patty Murray Chair Senate Appropriations Committee S-128 Capitol Building Washington, D.C. 20515

The Honorable Susan Collins Ranking Member Senate Appropriations Committee S-128 Capitol Building Washington, D.C. 20515 The Honorable Tom Cole Chairman House Appropriations Committee H-307 Capitol Building Washington, D.C. 20515

The Honorable Rosa DeLauro Ranking Member House Appropriations Committee 1036 Longworth House Office Building Washington, D.C 20515

Dear Chair Murray, Ranking Member Collins, Chairman Cole and Ranking Member DeLauro,

We, the undersigned patient organizations and related stakeholders, are writing to express our support for the inclusion of report language to establish the Food and Drug Administration (FDA) Rare Disease Center of Excellence in the Agriculture, Rural Development, Food and Drug Administration and Related Agencies Fiscal Year 2025 appropriations bill. The report language directs the FDA to create an Intercenter Institute for Rare Diseases that will serve as a cross-cutting, capacity-building, collaborative hub for rare disease activity at the FDA.

While interest in rare disease therapy development has increased since the passage of the historic Orphan Drug Act of 1983¹, the regulatory systems we have in place struggle to meet the unique challenges and complexities inherent in rare diseases. The last 40 years have yielded tremendous progress, going from 38 approved drugs to more than 1,200 approved indications for rare diseases². Despite significant scientific advancements, the rare disease community continues to face substantial obstacles in the development, review, and approval of safe and effective treatments. With over 10,000 rare diseases affecting more than 30 million Americans³, the urgency for a streamlined and focused approach in regulatory science and review processes cannot be overstated. About 95 percent of rare disease communities still lack an FDA-approved

¹ Fermaglich LJ, Miller KL. A comprehensive study of the rare diseases and conditions targeted by orphan drug designations and approvals over the forty years of the Orphan Drug Act. Orphanet J Rare Dis. 2023 Jun 23;18(1):163. doi: 10.1186/s13023-023-02790-7. PMID: 37353796; PMCID: PMC10290406.

²FDA. (n.d.). Search orphan drug designations and approvals.

https://www.accessdata.fda.gov/scripts/opdlisting/oopd/listResult.cfm

³ Groza, T., McMurry, J., Dawkins, H., Rath, A., Thaxon, C., Bocci, G., Joachimiak, M. P., Köhler, S., Robinson, P. N., Mungall, C., & Oprea, T. I. (2020). How many rare diseases are there? Nature Reviews Drug Discovery, 19(2), 77–78. https://doi.org/10.1038/d41573-019-00180-y

treatment⁴ and significant unmet needs remain for the communities that do have an approved treatment.

Through the 21st Century Cures Act, the FDA received the authority to establish one or more Intercenter Institutes for a major disease area or areas⁵. A Rare Disease Center of Excellence would bring together the extensive rare disease expertise across the FDA in one central location. A Center of Excellence would help organize all FDA resources – such as statisticians, regulatory scientists and experts in clinical trial design for small populations – within a single structure to avoid duplication and disciplinary silos as well as to make concentrated resources available to multiple review divisions. It would recognize that despite the wide diversity in clinical symptoms and organ systems affected by rare diseases, the barriers to effective therapeutic development are similar.

A Rare Disease Center of Excellence can address rare disease regulatory challenges. Small patient populations create challenges that require broad FDA expertise to address. Identifying the natural progression of disease, dispersing clinical trial sites, detecting clinically meaningful outcomes, and designing alternative clinical trials are all common across rare disease therapy development programs, but can be unique issues for a review team evaluating a rare disease therapy. In addition, the dispersion of rare disease experts across the entire FDA limits the ability to share best practices on how to address these challenges.

Time is the most precious commodity for the rare disease community. Each time a promising therapeutic target faces delays or demise due to the complexities in rare disease and strain on the existing regulatory infrastructure, lives are lost, investment is lost, and future scientific promise is unfulfilled. The creation of a Rare Disease Center of Excellence would not only catalyze scientific and medical breakthroughs but also offer hope to millions of Americans living with rare diseases.

Thank you for considering the needs of the rare disease patient community in the 118th Congress. The establishment of a Rare Disease Center of Excellence at FDA is a significant step forward in bridging the gap between rare disease patients and the innovative treatments urgently needed.

Should you have any questions, please reach out to Annie Kennedy with the EveryLife Foundation for Rare Diseases at <u>akennedy@everylifefoundation.org</u>.

Sincerely,

The EveryLife Foundation for Rare Diseases Adult Polyglucosan Body Disease Research Foundation

⁴ National Center for Advancing Translational Sciences (NCATS). (2023). Delivering Hope for Rare Diseases. NCATS. https://ncats.nih.gov/sites/default/files/NCATS_RareDiseasesFactSheet.pdf

⁵ 21st Century Cures Act, H.R. 34, 114th Cong. (2015).

Alexion, AstraZeneca Rare Disease Alliance for Patient Access Alpha-1 Foundation **Alport Syndrome Foundation Amicus Therapeutics Amyloidosis Foundation** Angelman Syndrome Foundation Association for Creatine Deficiencies Autoinflammatory Alliance Avery's Hope **Barth Syndrome Foundation** Biogen Born a Hero, Research Foundation CA Action Link for Rare Diseases (Cal Rare) California Life Sciences **Canary Advisors LLC** Center for Patient Advocacy Leaders (CPALs) Congenital Adrenal Hyperplasia Research, Education & Support Foundation DBA: CARES Foundation **COPD** Foundation Cure CMD Cure GM1 Foundation Cure HHT Cure SMA Cure VCP Disease CureARS CureDuchenne CureLGMD2i Foundation CureSHANK CureSPG50 Cyclic Vomiting Syndrome Association Cystic Fibrosis Research Institute Danny's Dose Alliance **Dravet Syndrome Foundation** EB Research Partnership **Elpida Therapeutics SPC Every Cure** Foundation for Angelman Syndrome Therapeutics (FAST) FD/MAS Alliance G6pd Deficiency Foundation, Inc. Galactosemia Foundation

Gaucher Community Alliance

- Gene Giraffe Project
- Global Genes
- Harmony Biosciences
- HCU Network America
- Hereditary Angioedema Association
- Huntington's Disease Society of America
- Hyman, Phelps & McNamara, PC
- Immune Deficiency Foundation
- Juju and Friends CLN2 Warrior Foundation
- Lennox-Gastaut Syndrome (LGS) Foundation
- Leukodystrophy Newborn Screening Action Network
- LGMD2D.org
- Lipodystrophy United
- Little Hercules Foundation
- Little Miss Hannah Foundation
- Lupus and Allied Diseases Association, Inc.
- Mahzi Therapeutics
- Mission MSA
- Mississippi Metabolics Foundation
- MLD Foundation
- Muenzer MPS Research & Treatment Center
- Myasthenia Gravis Foundation of America (MGFA)
- Myositis Support and Understanding
- National Fragile X Foundation
- National Leiomyosarcoma Foundation
- National MPS Society
- National PKU Alliance
- National Society of Genetic Counselors
- NBIA Disorders Association
- NTM Info & Research
- Organic Acidemia Association
- Parent Project Muscular Dystrophy
- Phoenix Nest
- Pompe Alliance
- Project Alive
- PWSA | USA Prader-Willi Syndrome Association
- Rare and Undiagnosed Network (RUN)
- Remember The Girls
- Rhythm Pharmaceuticals
- Sarcoidosis of Long Island

- SCAD Alliance (spontaneous coronary artery dissection)
- SCID Angels For Life Foundation
- Siegel Rare Neuroimmune Association
- SLC6A1 Connect
- Stealth BioTherapeutics
- STXBP1 Foundation
- SynGAP Research Fund, Inc.
- Team Titin
- **TESS Research Foundation**
- The Bluefield Project to Cure Frontotemporal Dementia
- The Ehlers-Danlos Society
- The Guthy-Jackson Charitable Foundation
- The LAM Foundation
- The Oxalosis and Hyperoxaluria Foundation
- **Travere Therapeutics**
- Undiagnosed Diseases Network Foundation
- United Mitochondrial Disease Foundation
- United MSD Foundation
- Wiskott-Aldrich Foundation
- Wylder Nation Foundation