

CDER Office of Surveillance and Epidemiology: 2017 Update

Gerald J. Dal Pan, MD, MHS

Director

Office of Surveillance and Epidemiology
Center for Drug Evaluation and Research

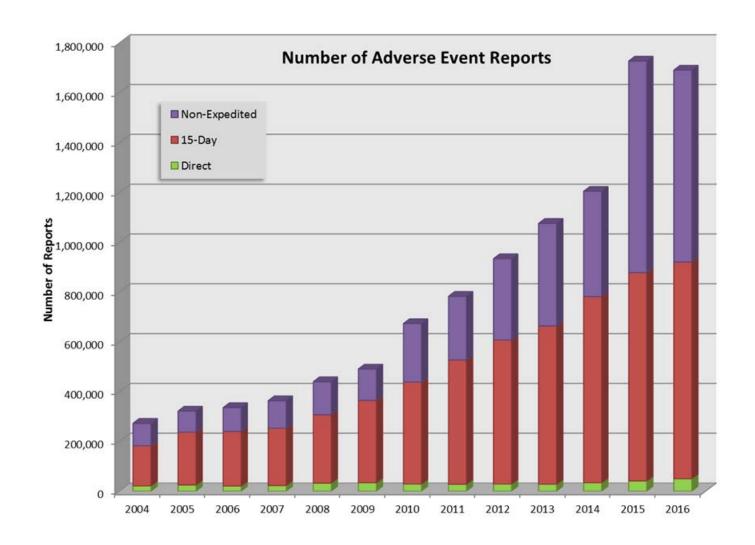
FDA/CMS Summit December 5, 2017



Adverse Event Data

FDA Adverse Event Reporting System PA (FAERS)





Best Practices for Pharmacovigilance



FDAAA 2007 establishes requirement for 18-month/10,000 patient safety review.

"(D) preparing, by 18 months after approval of a drug or after use of the drug by 10,000 individuals, whichever is later, a summary analysis of the adverse drug reaction reports received for the drug, including identification of any new risks not previously identified, potential new risks, or known risks reported in unusual number;

ARTICLES

Assessment of the Impact of Scheduled Postmarketing Safety Summary Analyses on Regulatory Actions

S Sekine^{1,2}, EE Pinnow¹, E Wu¹, R Kurtzig¹, M Hall¹ and GJ Dal Pan¹

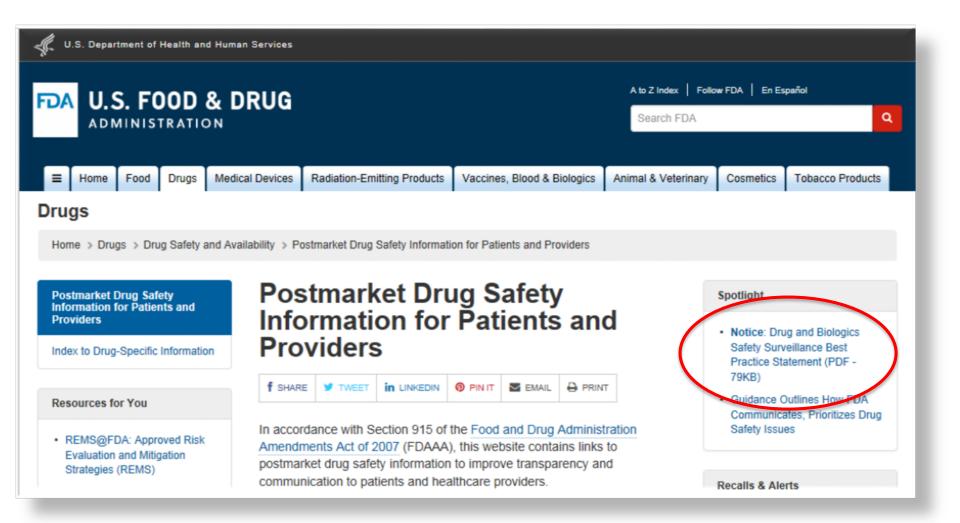
Impact analysis show that these reviews have little value.

21st Century Cures Act 2016 removes this requirement

(b) FAERS REVISION.—Section 505(r)(2)(D) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355(r)(2)(D)) is amended by striking ", by 18 months" and all that follows through the semicolon at the end of the subparagraph and inserting "and making publicly available on the Internet website established under paragraph (1) best practices for drug safety surveillance activities for drugs approved under this section or section 351 of the Public Health Service Act:".

Best Practices for Pharmacovigilance



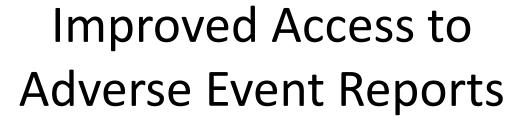


Best Practices for Pharmacovigilance



Drug and Biologics Safety Surveillance Best Practice Statement Center for Drug Evaluation and Research (CDER) Center for Biologics Evaluation and Research (CBER) US Food and Drug Administration

The 21st Century Cures Act (the "Cures Act"), enacted on December 13, 2016, has the goal of advancing medical product innovation as well as ensuring patient access to safe and effective treatments as soon as possible. One of the provisions of the Cures Act includes a revision to a previous statutory requirement that generally required FDA to undertake routine safety analyses of drugs 18 months following approval or after 10,000 individuals have used the drug, whichever occurs later. See section 505(r)(2)(D) of the Federal Food, Drug, and Cosmetic Act (FD&C Act) before and after it was amended by the Cures Act. These assessments were largely redundant to our current surveillance practices at the Food and Drug Administration (FDA), were not an efficient use of FDA resources, and did not provide



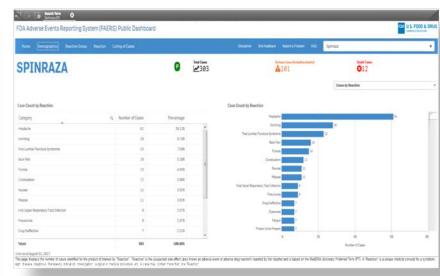


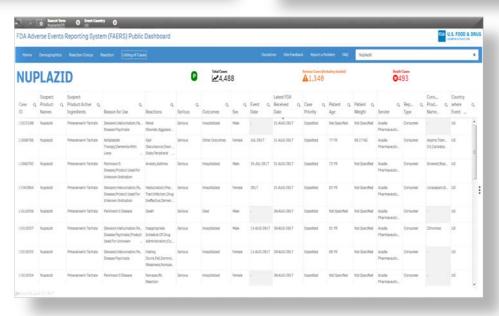




Sample Dashboard Search









Media Article



BIOTECH AND PHARMACEUTICALS

HOSPITALS | PHARMA | HEALTH INSURANCE | MODERN MEDICINE

Biotech stocks drop after FDA makes it easier for public to search for drug side effects

- · Biotech stocks fell Friday, a day after the U.S. Food and Drug Administration made its database of side effects for medicines searchable.
- · Sarepta Therapeutics, Ionis Pharmaceuticals, Biogen and Acadia Pharmaceuticals all traded lower after investors found reports on their drugs on the FDA's Adverse Events Reporting System.
- It is not clear whether the adverse events were caused by the medicines themselves, or were incidental, an analyst said.

Sarepta's Exondys 51, approved last year for certain patients with Duchenne muscular dystrophy, or DMD, had 11 reports of serious cases, including three deaths, according to FAERS.

Spinraza, a treatement from Biogen and Ionis for spinal muscular atrophy, or SMA, had 101 reports of serious cases, including 12 deaths.

And Acadia's Nuplazid, for patients with Parkinson's, had 1,343 serious case reports, including 493 deaths, FAERS reveals.

NLP and Machine Learning in FAERS



Journal of the American Medical Informatics Association, 0(0), 2017, 1–9 doi: 10.1 093/jamia/ocx022 Research and Applications





Research and Applications

Development of an automated assessment tool for MedWatch reports in the FDA adverse event reporting system

Lichy Han, 1 Robert Ball, 2 Carol A Pamer, 2 Russ B Altman, 3,4 and Scott Proestel2

¹Biomedical Informatics Training Program, Stanford University, Stanford, CA, USA, ²Office of Surveillance and Epidemiology, Center for Drug Evaluation and Research, Food and Drug Administration, Silver Spring, MD, USA, ²Department of Genetics, Starford University and ²Department of Bioengineering, Stanford University

Corresponding Author: Scott Proestel, Division of Epidemiology, Office of Biostafstics and Epidemiology, FDA Center for Biologics Evaluation and Research, White Oak Building 71, Room 1280, 10903 New Hampshire Avenue, Silver Spring, MD 20993, USA. Phone (240) 402-0396. E-mail: Scott Proestel/Bidd ahhs.gov

Received 1 September 2016: Revised 30 January 2017; Accepted 24 February 2017

ABSTRACT

Objective: As the US Food and Drug Administration (FDA) receives over a million adverse event reports associated with medication use every year, a system is needed to aid FDA safety evaluators in identifying reports most likely to demonstrate causal relationships to the suspect medications. We combined text mining with machine learning to construct and evaluate such a system to identify medication-related adverse event reports.

Methods: FDA safety evaluators assessed 326 reports for medication-related causality. We engineered features from these reports and constructed random forest, L1 regularized logistic regression, and support vector machine models. We evaluated model accuracy and further assessed utility by generating report rankings that represented a prioritized report review process.

Results: Our random forest model showed the best performance in report ranking and accuracy, with an area under the receiver operating characteristic curve of 0.66. The generated report ordering assigns reports with a higher probability of medication-related causality a higher rank and is significantly correlated to a perfect report ordering, with a Kendall's tau of 0.24 (P=.002).

Conclusion: Our models produced prioritized report orderings that enable FDA safety evaluators to focus on reports that are more likely to contain valuable medication-related adverse event information. Applying our models to all FDA adverse event reports has the potential to streamline the manual review process and greatly reduce reviewer workload.

Key words: drug-related side effects and adverse reactions, supervised machine learning

BACKGROUND AND SIGNIFICANCE

The US Food and Drug Administration (FDA) receives more than 4000 medication safety reports every day, and the number of reports received each year has been increasing exponentially over the last decade. These reports are stored in a database known as the FDA Adverse Event Reporting System (FAERS), which has collected over 11 million reports since its inception in 1969.¹ In the United States, reporting these adverse events, medication errors, and product quality issues by health care professionals and consumers via the MedWatch program is voluntary, but it is mandatory for drug
manufacturens. The FDA uses these reports to detect safety issues
that may not have been identified during pre-market clinical trials
used as the basis for medication approval. Among the reasons for
not detecting safety issues during pre-market evaluation are that the

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This work is written by US Government employees and is in the public domain in the United States.

Journal of the American Medical Informatics Association, 2017, Vol. 0, No. 0

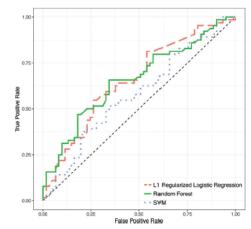


Figure 2. ROC curves for all classification models

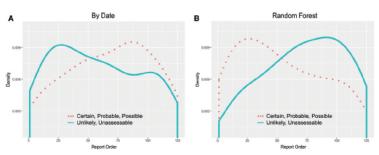


Figure 3. Comparison of report orderings in the held-outtest set by (A) date and (B) random forest with assessments of Cartain, Probable, or Possible vs assessments of Unlikely or Unassessable.

reporting systems, including the FDA Adverse Event Reporting System. Over the last decade, the number of adverse event reports has increased exponentially, resulting in a substantial workload for reviewers. Delays in detecting drug adverse events can have costly and detrimental effects on public health, and thus a system to identify reports most likely to contain information demonstrating causal drug events would be highly beneficial. Researchers have investigated such approaches using the US Vaccine Adverse Event Reporting System, in which extracted text features ^{16,37} were used with multiple classification algorithms to create an effective report classification model. ^{184–19}

The success of text classification in the Vaccine Adverse Event Reporting System and previous computational discoveries of new medication-related adven seevents in FAERS²¹⁻²⁷ have generated significant interest in developing a classification system for FAERS. To accomplish this, we built models to classify and rank advene event reports based on the likelihood of medication-related causality. In addition, we showed the potential utility of our models to assist manual adjudications by shifting reports with a higher probability of medication-related causality to a higher priority in rank orbits.

For the first phase of this study, we chose to focus on reports with assessments of Certain to Unassessable, as they constituted

Can Social Media Generate Signals?



Drug Saf (2014) 37:343–350 DOI 10.1007/s40264-014-0155-x

ORIGINAL RESEARCH ARTICLE

Digital Drug Safety Surveillance: Monitoring Pharmaceutical Products in Twitter

Clark C. Freifeld · John S. Brownstein ·
Christopher M. Menone · Wenjie Bao ·
Ross Filice · Taha Kass-Hout · Nabarun Dasgupta

- English-language Twitter posts mentioning 23 medical products
- Identified posts resembling adverse events (proto-AEs)
- Vernacular internet terms translated to MedDRA
- Terms aggregated by MedDRA SOC
- 4,401 proto-AEs identified
- High correlation with FAERS at SCO level

Author's conclusion:

"Patients reporting AEs on Twitter showed a range of sophistication when describing their experience. Despite the public availability of these data, their appropriate role in pharmacovigilance has not been established. Additional work is needed to improve data acquisition and automation."

Methods Development



Pharmacovigilance from social media: mining adverse drug reaction mentions using sequence labeling with word embedding cluster features RECEIVED 29 July 2014
REVISED 2 December 2014
ACCEPTED 4 December 2014
PUBLISHED ONLINE FIRST 9 March 2015





Azadeh Nikfarjam¹, Abeed Sarker¹, Karen O'Connor¹, Rachel Ginn¹, Graciela Gonzalez¹

Evaluation of Facebook and Twitter Monitoring to Detect Safety Signals for Medical Products: An Analysis of Recent FDA Safety Alerts

Carrie E. Pierce¹ · Khaled Bouri² · Carol Pamer² · Scott Proestel² · Harold W. Rodriguez¹ · Hoa Van Le¹ · Clark C. Freifeld^{1,3} · John S. Brownstein¹ · Mark Walderhaug² · I. Ralph Edwards⁴ · Nabarun Dasgupta¹

BMJ Open Utility of social media and crowdsourced data for pharmacovigilance: a scoping review protocol

Andrea C Tricco, 1,2 Wasifa Zarin, 1 Erin Lillie, 1 Ba Pham, 1 Sharon E Straus 1,3



Sentinel

FDA Sentinel System



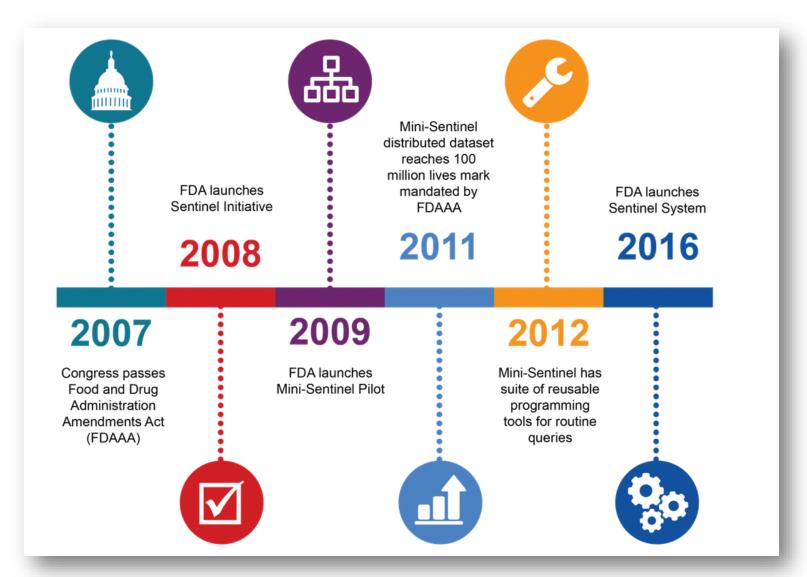
- National medical product monitoring system
- 17 data partners with 178 million members with pharmacy and medical coverage
- Distributed system where data partners retain physical control of data to protect privacy and security



www.sentinelinitiative.org/

Timeline





Requirement to Consider Sufficiency of ARIA before PMR



Section 905

Mandates creation of ARIA



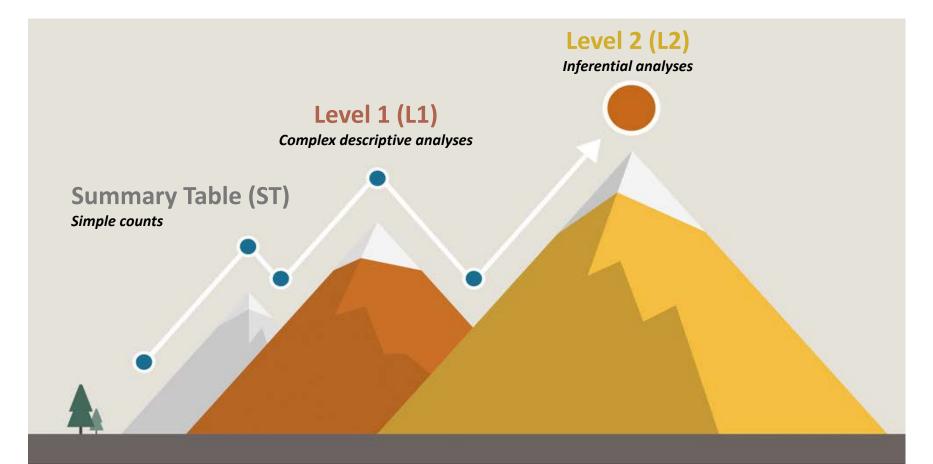
Section 901

New FDAAA PMR authority

"The Secretary may not require the responsible person to conduct a study under this paragraph, unless the Secretary makes a determination that the reports under subsection (k)(1) and the <u>active postmarket risk identification and analysis system</u> as available under subsection (k)(3) will not be <u>sufficient</u> to meet the purposes set forth in subparagraph (B)."

Active Risk Identification and Analysis

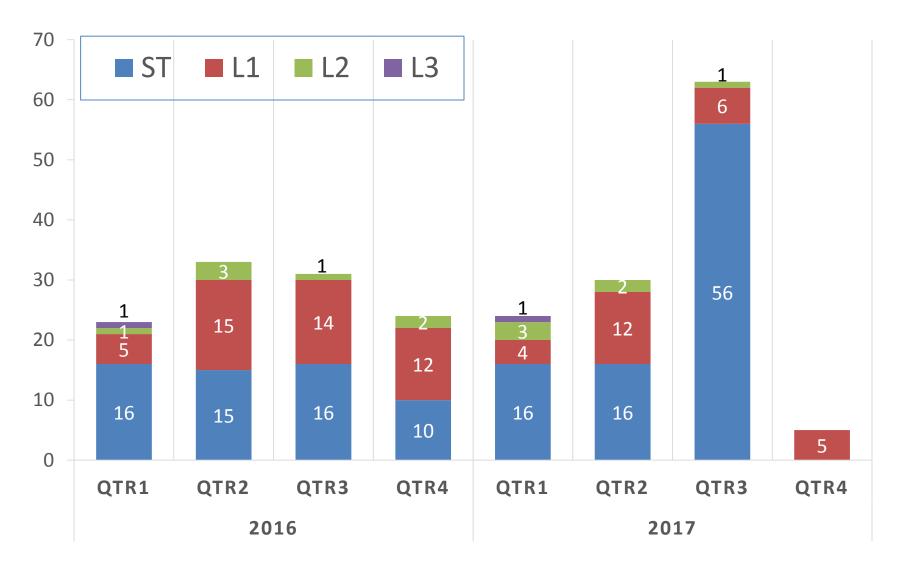




Modular Programs: Validated, re-usable analytic tools that facilitate rapid safety analyses to be run on high quality electronic healthcare data

Sentinel ARIA Analyses (N=233)





10th Annual Public Workshop





https://healthpolicy.duke.edu/events/2018-sentinel-initiative-annual-public-workshop

Sentinel and PDUFA



PDUFA V Commitments

- Public stakeholder meeting
- Fund 4 6 activities
- Interim Sentinel Assessment
- Final Sentinel Assessment







PDUFA VI Commitments

- Expand data sources and core capabilities
- Enhance communications with sponsors and public
- Evaluate additional ways to facilitate public and sponsor access to Sentinel
- Hold public stakeholder meeting
- Establish MAPPS and SOPPs for sponsor communication
- Integrate Sentinel into drug review
- Develop a comprehensive training program for review staff
- Report impact of Sentinel expansion and integration by FY2022

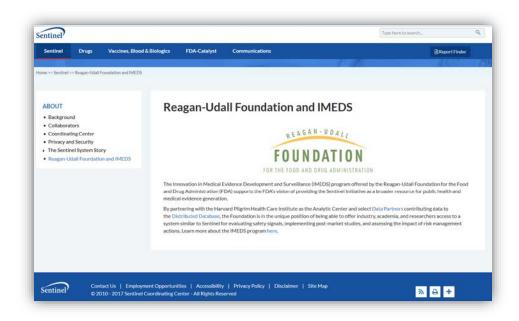








Making Sentinel Available to Others



- IMEDS shares the same analytic center at Harvard Pilgrim Healthcare as Sentinel
- IMEDS has the same analytic tools and similar database available to FDA
- IMEDS is publicly accessible
- Currently active with multiple analyses ongoing

Real-world Evidence



The NEW ENGLAND JOURNAL of MEDICINE

SOUNDING BOARD

Real-World Evidence — What Is It and What Can It Tell Us?

Rachel E. Sherman, M.D., M.P.H., Steven A. Anderson, Ph.D., M.P.P., Gerald J. Dal Pan, M.D., M.H.S., Gerry W. Gray, Ph.D., Thomas Gross, M.D., M.P.H., Nina L. Hunter, Ph.D., Lisa LaVange, Ph.D., Danica Marinac-Dabic, M.D., Ph.D., Peter W. Marks, M.D., Ph.D., Melissa A. Robb, B.S.N., M.S., Jeffrey Shuren, M.D., J.D., Robert Temple, M.D., Janet Woodcock, M.D., Lilly Q. Yue, Ph.D., and Robert M. Califf, M.D.



Risk Evaluation and Mitigation Strategies

Format and Content of REMS Document



- Format and Content of a REMS Document
 - Revised draft guidance
- Includes a section for each participant
 - Who
 - What
 - When
 - With what

Format and Content of a REMS Document Guidance for Industry

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 60 days of publication in the Federal Register of the notice announcing the availability of the draft guidance. Submit electronic comments to https://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. All comments should be identified with the docket number listed in the notice of availability that publishes in the Federal Register.

For questions regarding this draft document, contact (CDER) Gita Toyserkani at 301-796-1783, or (CBER) Office of Communication, Outreach and Development, 800-835-4709 or 240-402-8010.

U.S. Department of Health and Human Services Food and Drug Administration Center for Drug Evaluation and Research (CDER) Center for Biologics Evaluation and Research (CBER)

> October 2017 Drug Safety Revision 1

Use of a Drug Master File for Shared System REMS Submissions



- Draft guidance issued
 November 2017
- Intended to improve efficiency

Use of a Drug Master File for Shared System REMS Submissions

Guidance for Industry

DRAFT GUIDANCE

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U.S. Department of Health and Human Services Food and Drug Administration Center for Drug Evaluation and Research (CDER) Center for Biologics Evaluation and Research (CBER)

> November 2017 Procedural

REMS Document and Structured Product Labeling



- REMS into SPL format
 - Draft guidance
- Make REMS
 information available
 within existing
 healthcare systems
 and workflows
 - Easier sharing of information and incorporation in health information technology

Providing Regulatory
Submissions in Electronic
Format — Content of the Risk
Evaluation and Mitigation
Strategies Document Using
Structured Product Labeling

DRAFT GUIDANCE

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 180 days of publication in the Federal Register of the notice announcing the availability of the draft guidance. Submit electronic comments to https://documents.org/length/9/18/2052 Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the Federal Register.

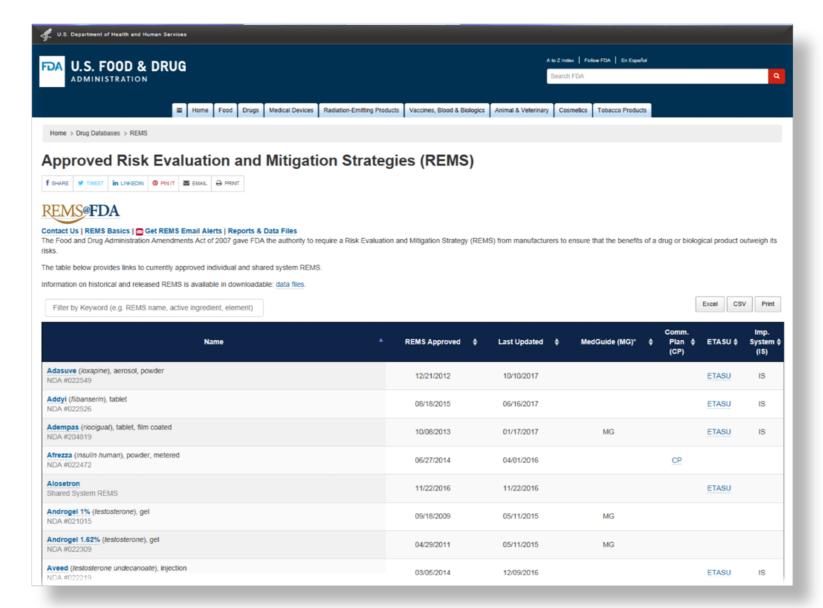
For questions regarding this draft document, contact (CDER) Adam Kroetsch, 301-796-3842, Aaron Sherman, 240-402-0493, or (CBER) Office of Communication, Outreach and Development, 800-835-4709 or 240-402-8010.

> U.S. Department of Health and Human Services Food and Drug Administration Center for Drug Evaluation and Research (CDER) Center for Biologics Evaluation and Research (CBER)

> > September 2017 Electronic Submissions



REMS Website



Stakeholder Sections





Healthcare Providers who prescribe clozapine products must
 Patients who are prescribed clozapine shared system products
 Outpatient pharmacies that support electronic telecommunication verification and that dispense clozapine shared system products must
 Outpatient pharmacies that do NOT support electronic telecommunication verification and that dispense clozapine shared system products must
 Inpatient pharmacies that dispense clozapine shared system products must
 Wholesalers that distribute clozapine shared system products must

View additional drug-specific postmarket safety information from the FDA

Disclaimer: This webpage provides general information about REMS programs to various REMS participants (e.g., patients, pharmacies, and healthcare providers). The summary information provided herein is not comprehensive and may not include all of the information relevant to REMS participants. This webpage does not constitute a replacement, modification, or revision of the approved REMS document, including any appended REMS materials. Refer to the approved REMS document for complete information on the REMS requirements for each approved application.

Stakeholder Sections



Clozapine

Shared System REMS REMS last update: 09/15/2015

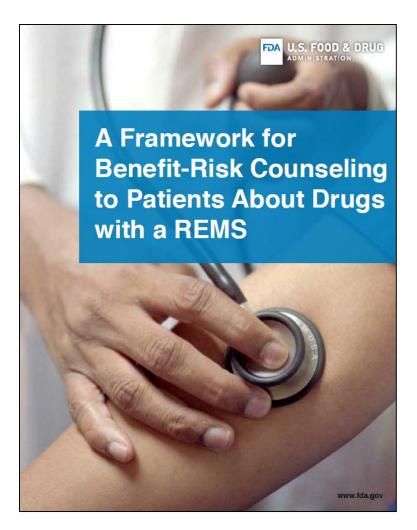
View additional drug-specific postmarket safety information from the FDA

Goals Summary **REMS Materials** Update history Products What do participants need to know? Below is a general overview of the REMS for all REMS participants (e.g., patients, pharmacies, and healthcare providers). See the application holder(s) REMS Website or the approved REMS materials for more information. View application holder(s) REMS Website ₽ - Healthcare Providers who prescribe clozapine products must · Review the drug's prescribing information. • Review Clozapine and Risk of Neutropenia: A Guide for Healthcare Providers. | Clozapine and the Risk of Neutropenia: A Guide for Healthcare Providers | To be able to prescribe · Complete the Knowledge Assessment for Healthcare Providers and submit the successfully completed knowledge assessment to the application holder. | Knowledge Assessment for Healthcare Providers . Enroll in the REMS by completing and submitting the Prescriber Enrollment Form. | Prescriber Enrollment Form | · Counsel the patient on the risks associated with clozapine including severe neutropenia and the REMS program requirements using What You Need to Know about Clozapine and Neutropenia: A Guide for Patients and Caregivers. | What You Need to Know about Clozapine and Neutropenia: A Guide for Patients and · Unless clinical judgment indicates that the patient's adherence to the treatment regimen will be negatively impacted: provide the patient with What You Need to Know about Clozapine and Neutropenia: A Guide for Patients and Caregivers. | What You Need to Know about Clozapine and Neutropenia: A Guide for Patients Before the first prescription tients and Caregivers | · Assess the patient's absolute neutrophil count (ANC). Document and submit the results to the REMS program via the online system, by fax, or calling the • Enroll the patient by completing and submitting the Patient Enrollment Form. Retain a completed copy in the patient's record. | Patient Enrollment Form | · Assess the patient's ANC. Document and submit the results to the REMS program via the online system, by fax, or calling the contact center. · For patients with an ANC that falls below the acceptable range described in the Prescribing Information: assess the patient's benefits of continuing treatment At specified intervals, according to the Prescribing with the risks of developing severe neutropenia. Information for a clozapine product, during treatment · For patients whose continuing treatment benefit exceeds the risk of developing severe neutropenia: document and submit the authorization to continue treatment to the REMS program. + Patients who are prescribed clozapine shared system products + Outpatient pharmacies that support electronic telecommunication verification and that dispense clozapine shared system products must + Outpatient pharmacies that do NOT support electronic telecommunication verification and that dispense clozapine shared system products must Inpatient pharmacies that dispense clozapine shared system products must Wholesalers that distribute clozapine shared system products must

Framework for Benefit-Risk Counseling to Patients About Drug with a REMS



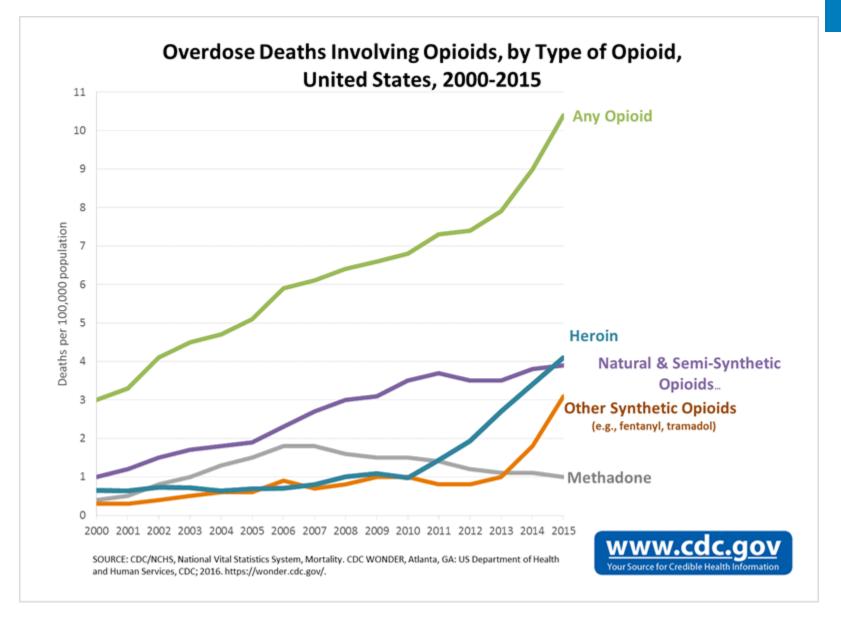
- Part of REMS Integration
 Initiative
- Four Es:
 - Evaluate
 - Educate
 - Engage
 - Ensure





Prescription Opioid Abuse





Opioids



- A busy year!
- Six of seven Drug Safety and Risk Management
 Advisory Committee meetings 2017 concerned opioids
- Three public meetings:
 - Packaging, Storage, and Disposal Options To Enhance Opioid
 Safety--Exploring the Path Forward, December 11-12, 2017
 - Data and Methods for Evaluating the Impact of Opioid
 Formulations with Properties Designed to Deter Abuse in the Postmarket Setting: A Scientific Discussion of Present and Future Capabilities, July 10, 2017
 - Training for Opioid Analgesic Prescribers, May 9-10, 2017



Opana ER

