IOM Report on *The Future of Drug Safety*: Looking to the Future

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Important Progress – But Challenges and Opportunities Remain

- Front and center issue for public
- FDA has responded – within available limited resources
- All stakeholders engaged, with secondary reports
- IOM has helped shape policy directions – and can do more to help assure effective improvements in future
- Congressional action will come

Key Issues

- Resources and Technical Capabilities
- Regulatory Authorities
- Operations and Management
- Information and Communication
- Public-Private Collaboration

Pre-Market Enhancements

- Concepts
  - Better Safety Science so not just risk-access tradeoff (biomarkers and predictors, individualized risk differences)
  - Systematic “life cycle” approach: continuous learning about risks and benefits with areas of potential concern identified for postmarket evaluation
- Steps
  - Resources to support Critical Path, related collaborative safety initiatives: virtually no financial support now
  - Culture change to support continuous learning in FDA – and in the rest of the health care system
  - Perspectives from ODEs, OSE better integrated

Post-Market: Better Evidence on Risks (and Benefits)

- Concepts:
  - Population-based determination of safety signals (rare events, suspected risks, further work on data mining)
  - Better evidence on how drugs are being used
  - More efficient, targeted capability for followup clinical studies
- Steps
  - FDA: enhanced tracking and followup of postmarket issues, planned improvements in AERS, and pilots of new postmarket drug monitoring strategies (all that's possible with existing funding and legislation)
  - Broad support for "federated" public-private partnership to detect signals and supporting followup studies: develop funding and governance to get better evidence at lower overall cost
  - Need for potentially costly clinical followup studies will remain
  - Greater interoperability and more momentum for more complete electronic infrastructure, including steps to reduce costs of clinical studies (e.g., NIH CTSA program)

Post-Market: Information Communication and Impact on Practice

- Concepts
  - More transparency and clarity about FDA risk-benefit evaluation processes and regulatory conclusions
  - More comprehensive and useful information on clinical trials, through registration and reporting results
  - Improved ability to get relevant information on risks and benefits to clinicians and patients, with practical impact on treatment choices
- Steps
  - FDA efforts to provide more transparency about review and Advisory Committee process
  - Legislative requirements for clinical trial reporting on clinicaltrials.gov and elsewhere, but need for more resources and further steps to assure accuracy and consistency of results reporting
  - FDA steps to provide more timely and clear updates on latest safety-related evidence

Post-Market: Regulation

- Concepts
  - Clarity and “graded” tools for evaluating benefit-risk profile, including enforcement steps between “bully pulpit” and removing drug from market, throughout the drug life cycle
  - Special attention to marketing “new” drugs
  - But concerns about whether proposed regulatory authorities respond appropriately and efficiently to public concerns
- Steps
  - FDA evaluation of RiskMAP strategy in pilots (don’t need or expect to use authority beyond usual monitoring in most cases)
  - Likely further legislative action to provide more powerful toolkit with additional enforcement responses – but should assure that such steps are solving problems efficiently (e.g., include attention to better premarket science, population-based monitoring) both in legislative process and subsequently

Next Steps 1

- Resources, resources, resources
  - More resources and greater technical capabilities at FDA are essential to carry out IOM recommendations successfully – additional regulatory authorities, organizational change, and better information are not sufficient and in fact require more resources
  - More clarity about specific resource needs
  - Yet spending a lot now on safety in health care system – and will be spending more
    - PDUFA IV, drug safety legislation, health plan investments, drug company investments
  - Need for cost-effective approaches
  - Public-private collaborations

Next Steps 2

- Opportunities to achieve consensus on how to move forward on key issues, including public-private collaborations to:
  - improve safety science (Critical Path)
  - develop better post-market evidence on risks and on actual use of drugs
  - develop more individualized and effective risk-benefit communication
  - assess development and use of new regulatory tools
  - create a health system that gets best treatment to each patient and keeps getting better, while avoiding unnecessary costs and delays in access