Pediatric Advisory Committee Risk-Based Assessment Proposal for CDER Products

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Presentation Objectives

- **Describe Risk-Based Assessment Proposal for the Center for Drug Evaluation and Research (CDER) Products to the Members of the Pediatric Advisory Committee (PAC)**

- **Solicit feedback from PAC Members about Risk-Based Assessment Proposal for CDER Products**

Presentation Outline

- ❑ Brief Overview of Risk-Based Assessment Proposal Process
- ❑ Comparison to Current Review Process
  - Factors to consider products low safety risk
  - Abbreviated presentations to web-based reports
- ❑ Advantages of Risk-Based Assessment Proposal

Presentation Outline

- **Brief Overview of Risk-Based Assessment Proposal Process**
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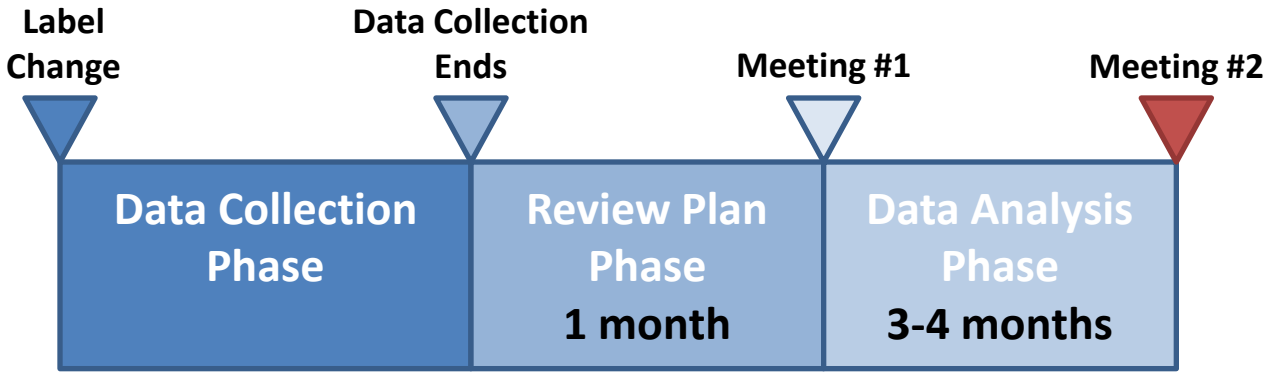
- Advantages of Risk-Based Assessment Proposal

Overview of Risk-Based Assessment Proposal

- Risk-Based Assessment Proposal is a modification to PAC review for certain CDER products that are designated "low safety risk"

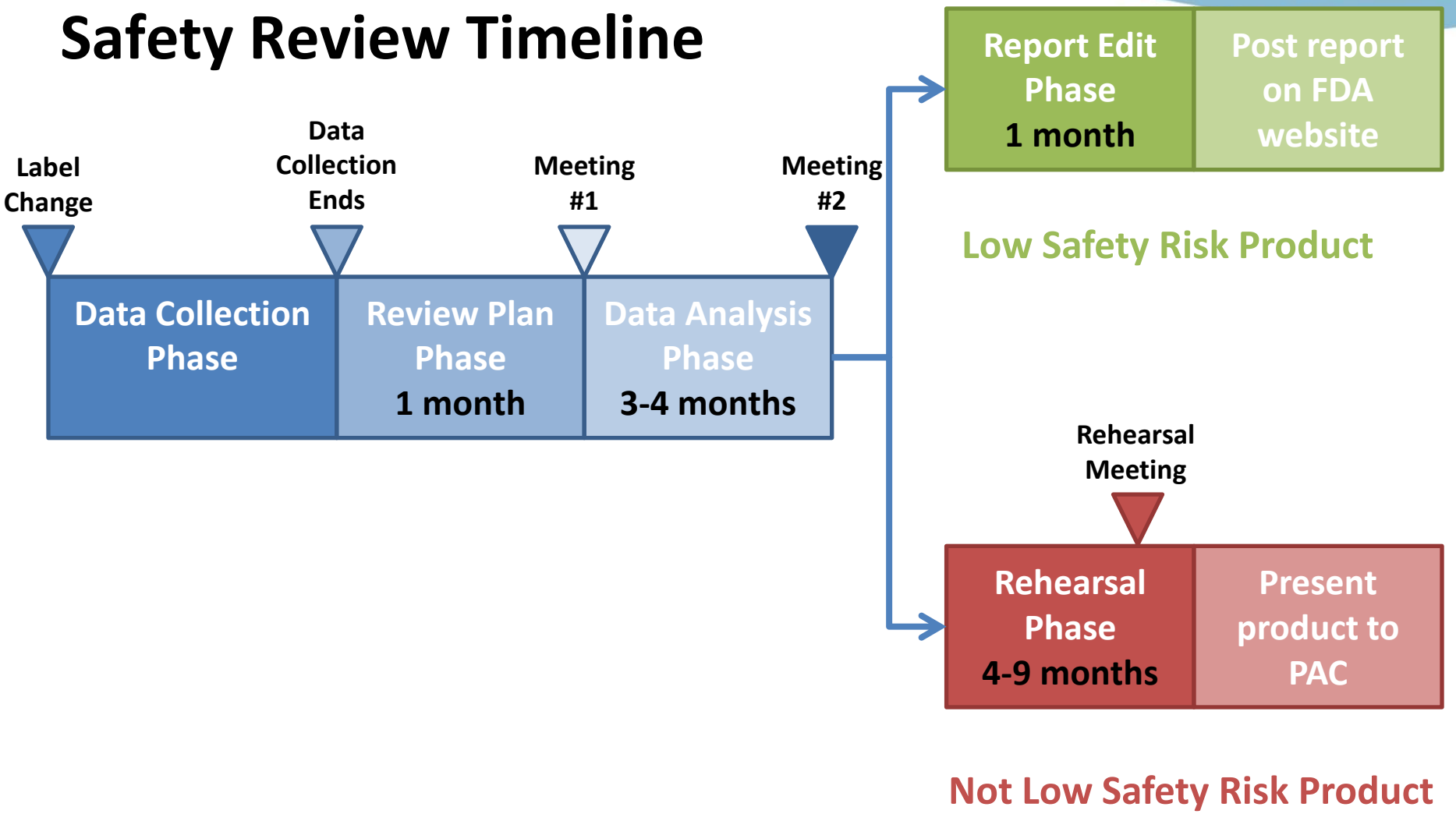
- Factors to determine "low safety risk" CDER products built from existing criteria currently used for abbreviated presentations to PAC

Proposed CDER Product Safety Review Timeline



- FDA Adverse Event Reporting System (FAERS) collects adverse events reports
- Office of Surveillance and Epidemiology (OSE) creates Pediatric Post-Marketing Pharmacovigilance review plan
- OSE reviews safety and use data and writes Pediatric Post-Marketing Pharmacovigilance and Drug Utilization Review Draft

Proposed CDER Product Safety Review Timeline

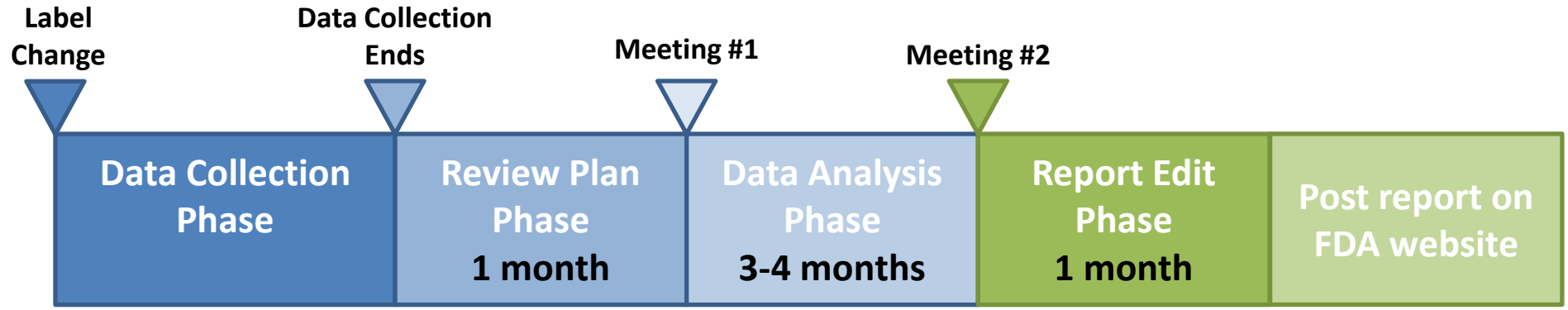


Proposed Factors Informing Whether CDER Product is a Low Safety Risk

1. No pediatric deaths or pediatric deaths likely attributable to disease progression.
2. No or few serious adverse events (SAEs) attributable to product.
3. No new safety signals identified by FDA through literature review, FAERS case review, drug utilization data review, and ongoing tracked safety issues for product or class of products.
4. Product adequately labeled for pediatric use including dosing information and adverse events included in product label.
5. There is little pediatric use or if the number of adverse events relative to the use is not concerning.

Proposed CDER Product Safety Review Timeline

Low Safety Risk Products



- FAERS collects adverse events reports

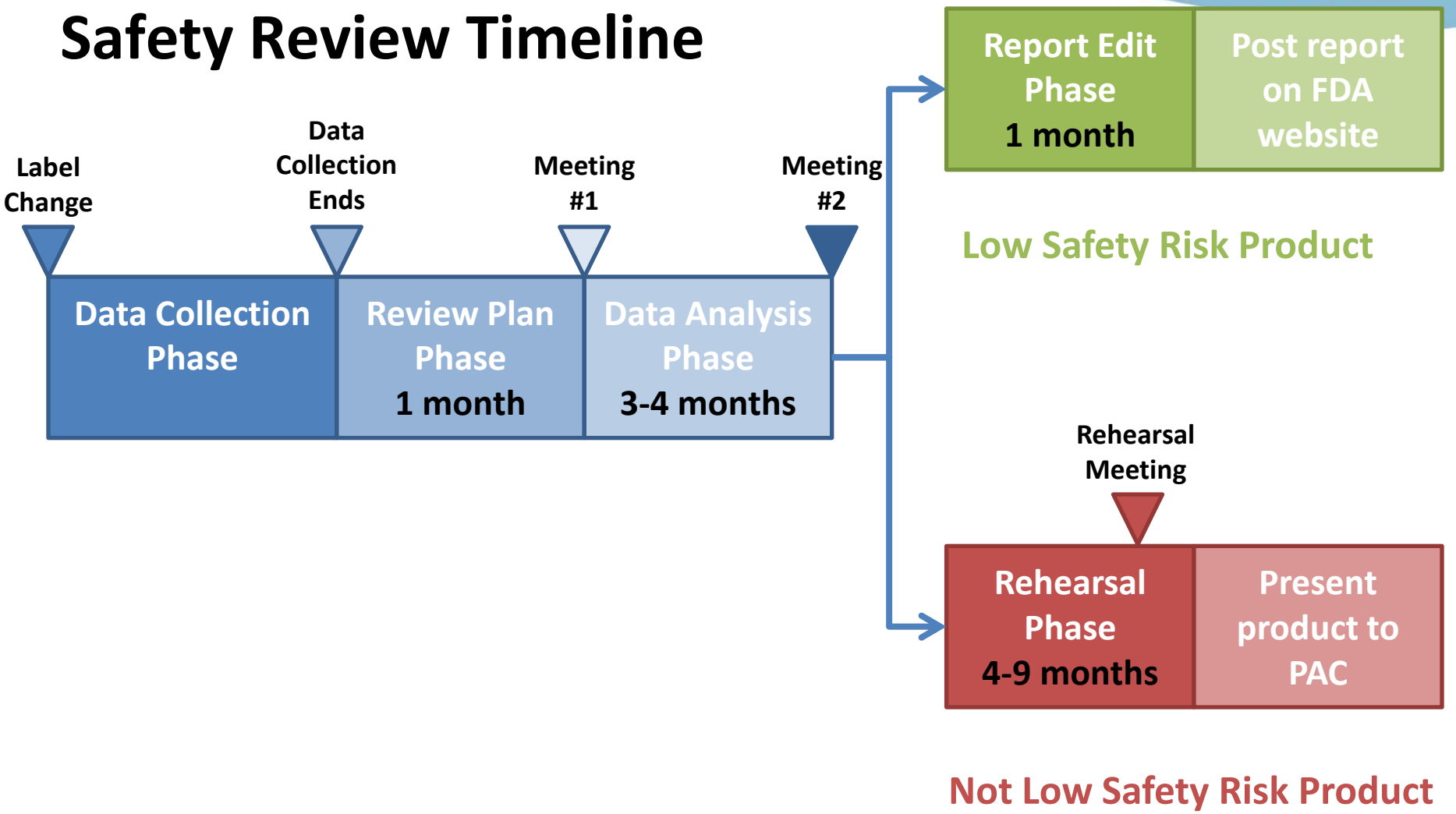
- OSE creates Pediatric Post-Marketing Pharmacovigilance review plan

- OSE reviews safety and use data and writes Pediatric Post-Marketing Pharmacovigilance and Drug Utilization Review Draft

- Edits and clearance of Pediatric Post-Marketing Pharmacovigilance and Drug Utilization Review Report

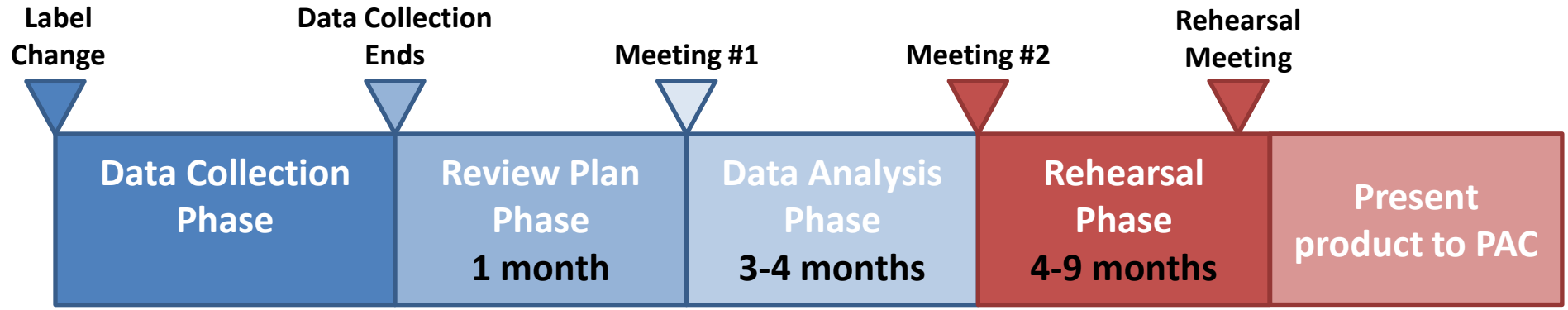
- Federal Register notice published
- Open docket

Proposed CDER Product Safety Review Timeline



Proposed CDER Product Safety Review Timeline

Not Low Safety Risk Products



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- OSE reviews safety and use data and writes Pediatric Post-Marketing Pharmacovigilance and Drug Utilization Review Draft

- Edits, clearance, and updates (if needed) to safety report
- Create and rehearse presentation

- Presentation in standard or expanded format

Presentation Outline

- Brief Overview of Risk-Based Assessment Proposal Process
- **Comparison to Current Review Process**
  - **Factors to consider products low safety risk**
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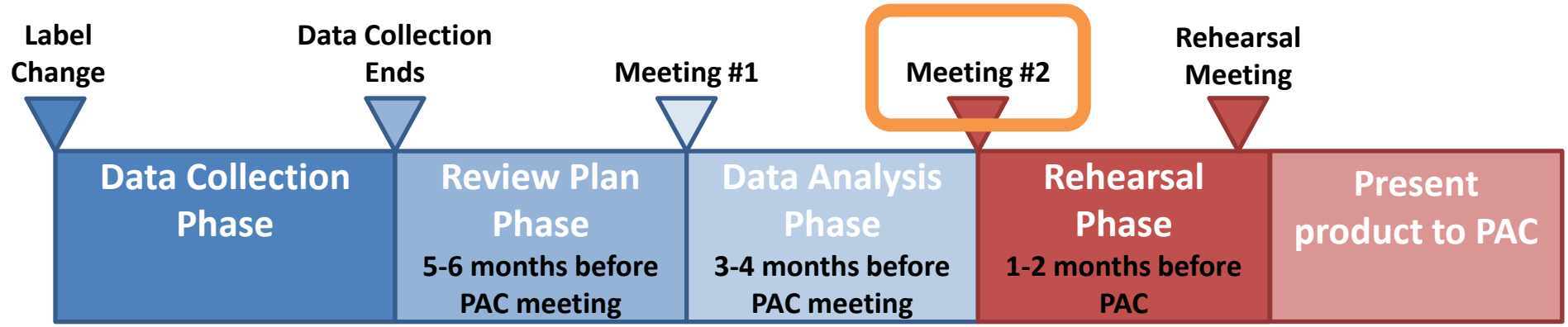
Current CDER Product Safety Review Timeline



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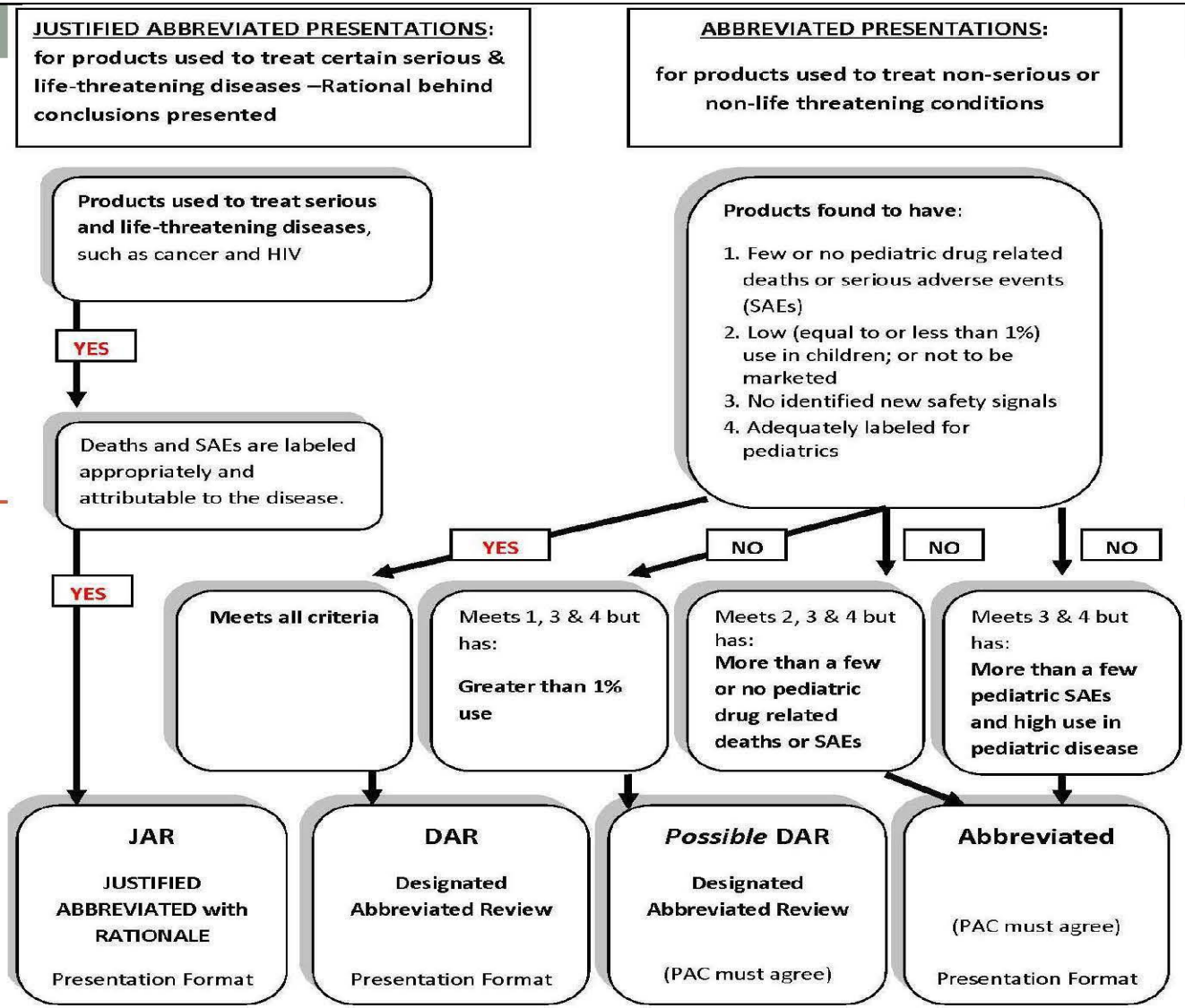
Current Factors for Abbreviated Presentations



Current Factors for Abbreviated Presentations

1. Product used to treat certain serious and life-threatening diseases
2. Deaths and SAEs are labeled appropriately and attributable to the disease
3. Product used to treat non-serious or non-life threatening conditions
4. No identified new safety signals
5. Product adequately labeled for pediatrics
6. No or few pediatric drug related deaths or SAEs
7. Low (≤1%) use in children or not to be marketed

Proposed Factors Informing Whether CDER Product is a Low Safety Risk

1. No pediatric deaths or pediatric deaths likely attributable to disease progression.
2. No or few SAEs attributable to product.
3. No new safety signals identified by FDA through literature review, FAERS case review, drug utilization data review, and ongoing tracked safety issues for product or class of products.
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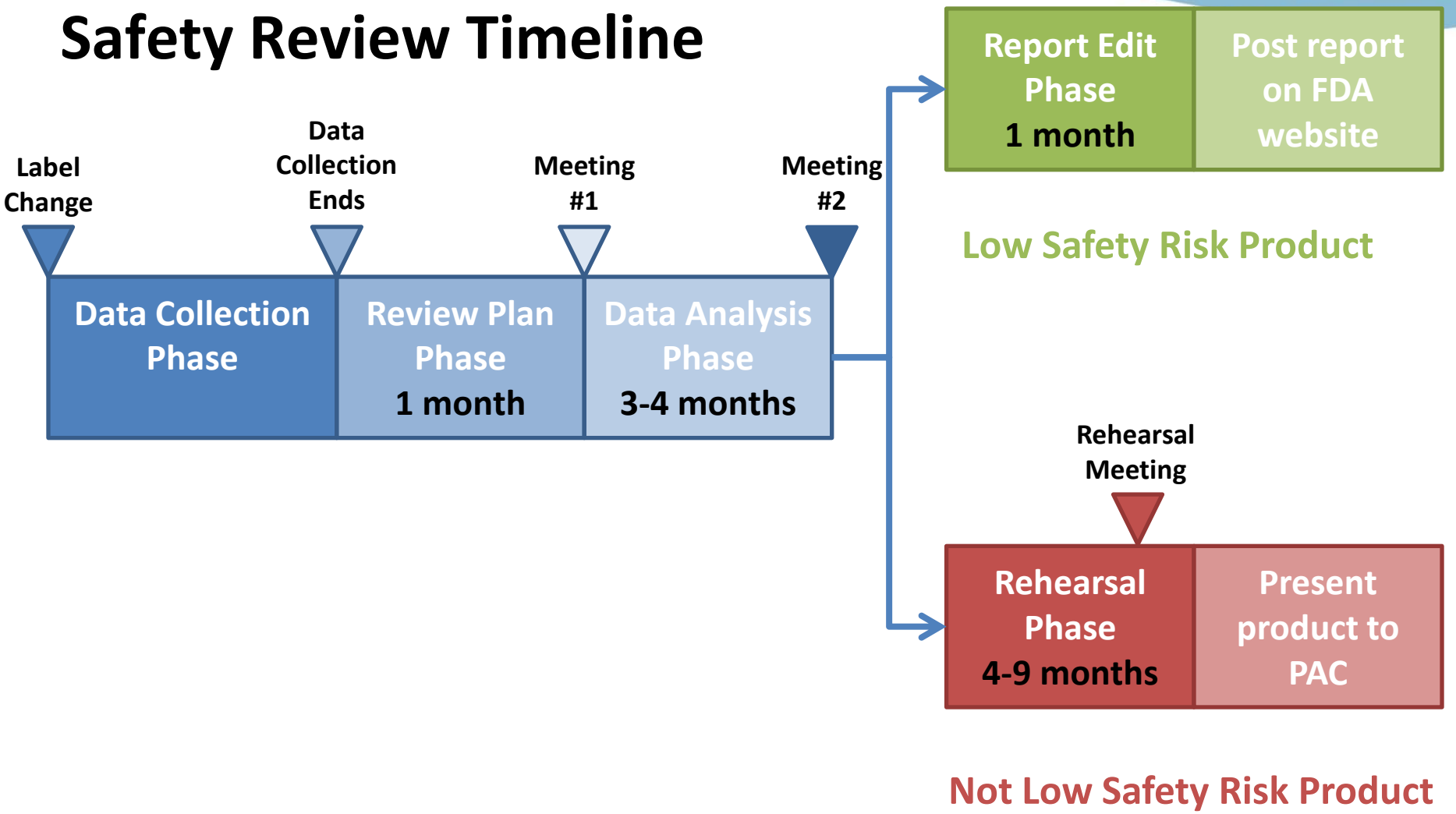
Proposed CDER Product Safety Review Timeline



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Advantages of Risk-Based Assessment Proposal

- **More time for PAC to discuss CDER products that are not designated low safety risk**
  - Safety reports of products designated low safety risk will be posted to FDA website and no longer be presented at PAC safety meetings
  - Allows more time for discussion of CDER products presented to PAC during safety meeting
- Future potential to decrease backlog of CDER products awaiting PAC review
  - Use continuous quality improvement process to further increase efficiency and increase number of CDER products the PAC reviews each year

History of PAC Review of CDER Products

Since Adaptation of Current Presentation Format from 2012–2015:

- 99 CDER products were reviewed by PAC
  - 46 in standard presentation format
  - 53 in abbreviated presentation format

History of PAC Review of CDER Products

From 2012–2015:

- 22 CDER products were reviewed by PAC per year
  - Range = 19-24
- 34 CDER products became eligible for PAC review per year
  - Range = 29-39

Advantages of Risk-Based System

- More time for PAC to discuss CDER products that are not designated low safety risk
  - Safety reports of products designated low safety risk will be posted to FDA website and no longer be presented at PAC safety meetings
  - Allows more time for discussion of CDER products presented to PAC during safety meeting
- **Future potential to decrease backlog of CDER products awaiting PAC review**
  - Use continuous quality improvement process to further increase efficiency and increase number of CDER products the PAC reviews each year

Current Backlog of CDER Products

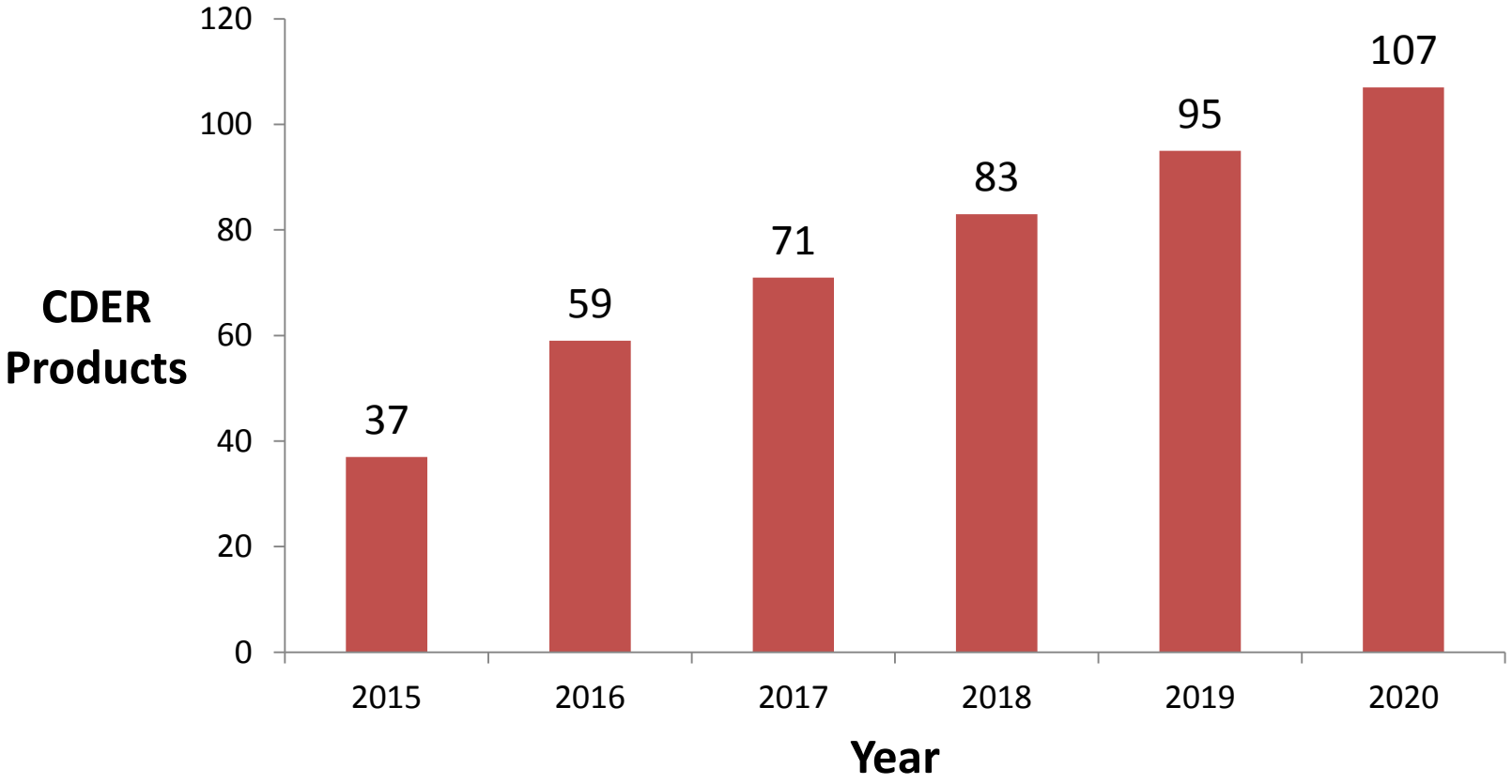
As of December 31, 2015:

- 37 CDER products await PAC review
  - Median waiting time = 26 months

By December 31, 2016:

- 44 additional CDER products are eligible for PAC review

Projected Backlog of CDER Products Awaiting PAC Review



The estimated backlog increases almost 300% from 2015 to 2020.

Risk-Based Assessment Proposal for CDER Products

- Decrease the number of CDER product presentations during PAC pediatric-focused safety meetings
- As a result, increase the available discussion time of CDER products presented during PAC meetings
- Find further efficiencies in risk-based assessment proposal through continuous quality improvement process
- As further efficiencies are identified, hopefully increase number of CDER products reviewed by FDA per year