NCCN Oncology Summit: Recommendation for REMS Stakeholders

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www.nccn.org

National Comprehensive Cancer Network®

Presenter

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REMS Background

- **1938: Federal Food Drug and Cosmetic Act enacted**
  - US Food and Drug Administration (FDA) regulatory responsibility
- **2002: Prescription Drug User Fee Act III**
  - RiskMAPS developed (30 in place by 2007) (e.g., thalidomide STEPS)
- **2004: High profile product safety recall**
  - Rofecoxib (Vioxx): 28,000 associated deaths
    - **FDA blamed for "Drug Safety Crisis"**
  - Rosiglitazone (Avandia): increased myocardial ischemic events
  - Anti-depressants: increased suicidal ideation

REMS Background

- **2006: IOM "The Future of Drug Safety: Promoting and Protecting the Health of the Public"**
  - Recommended FDA have explicit authority to require manufacturers to implement post marketing risk assessment and minimization programs
- **2007: FDA Amendments Act (FDAAA) signed**
  - Implemented March 25, 2008
  - Title IX led to Risk Evaluation and Mitigation Strategies (REMS)
  - REMS replaced RiskMAP
    - RiskMAP drugs "grandfathered" into REMS

REMS Background

- **Goals stated for REMS**
  - Increase FDA drug approval rate
  - Ensure drug safety in the approval process
    - "*Should target the achievement of a particular health outcome or knowledge related to known safety risks…*"
  - Decrease risk of adverse events
    - Discovered in pre-marketing trials
    - Discovered in post-marketing experience
    - "*Determine if REMS is necessary to assure drug benefits outweigh risks*."

Components of REMS

- **Medication Guide**
- **Communication Plan**
- **Elements to Assure Safe Use (ETASU)**
- **Implementation System**

Authority and Accountability

- **Manufacturers are accountable for:**
  - Development of REMS program
  - Certification and education providers
  - Collecting outcomes data
    - But manufacturers cannot hold providers accountable!
  - Surveillance of program effectiveness: 18mo., 3 yr., 7 yr.
- **FDA has enforcement authority**
  - Fines
  - Withdraw drug from market

REMS Considerations

- **Size of population using drug**
- **Seriousness of disease or condition**
- **Expected benefit from the drug**
- **Potential ADR and background rate of ADR for population**

REMS Considerations

- **Drugs with RiskMAPS**
  - ANDA associated with RiskMAP or REMS reference drug
- **Whether drug is a new molecular entity**
  - Raises the issue of biosimilar drugs
- **Future potential drug candidates (?)**
  - Drugs with Black Box Warnings
  - All “hazardous” drugs (e.g., chemotherapy)
  - Abuse potential (e.g., opioids)
  - Drugs that place others at risk

FDA Drug Safety Strategies
Current non-REMS programs

- Required Black Box Warnings (430)
- Patient Package Inserts (240)
- RiskMAPS
- Increased Med Watch Program activity
- Sentinel Initiative
  - National strategy for monitoring population groups
- OBRA
  - Individual patient counseling requirements

REMS Required Components
www.fda.gov/Drugs/DrugSafety (4/21/2010)

Number of Drugs	Required Components
76	Medication Guide
19	Medication Guide Communication Plan
2 Alvimopan (Entereg), Sacrosidase	Communication Plan Elements To Assure Safe Use (ETASU) Implementation System
6 ESAs, Romiplastin, Fentanyl Buccal, Vigabatrin	Medication Guide Communication Plan ETASU Implementation System
3 Promacta, Bosentan, Letairis	Medication Guide ETASU Implementation Guide

5 Characteristics of Successful REMS

- Patient centric and prescriber friendly
  - Otherwise drug won't be used
- Minimal drug access issues
- Enhance service model
  - Shared data
  - Reimbursement criteria implied / agreed
- Speed and response regarding customer service
- Outcomes fed into shared CE database

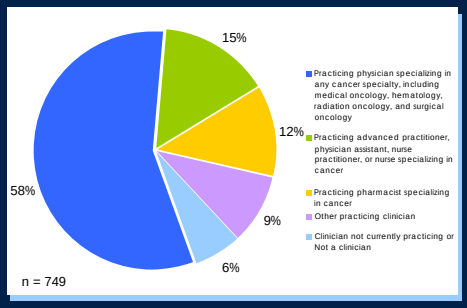
About NCCN Trends™ Survey

- Analytics tool from the National Comprehensive Cancer Network® (NCCN®)
- Surveys how clinicians across the U.S. and around the globe are delivering cancer care on a monthly basis
- Designed to reach targeted populations
- Can include several thousand clinicians as a potential sample size

NCCN Trends™ Survey

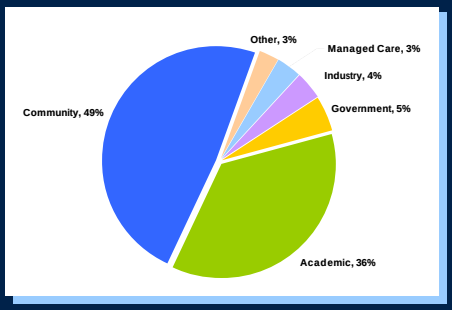
- March 2010 survey was on the topic of REMS
- Questions developed by the NCCN REMS Work Group
- Survey sent to registrants of NCCN.org

Survey Demographics



NCCN Trends™ Survey, March 2010

Practice Setting



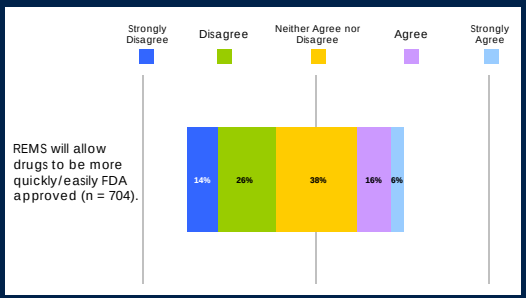
NCCN Trends™ Survey, March 2010

Goal of REMS –

Quicker / Easier FDA Approval

What do Trends Survey participants think?

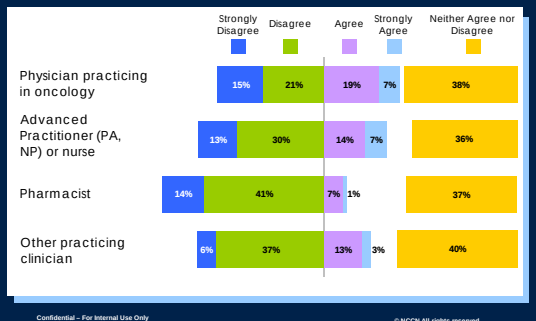
Rate the extent to which you agree or disagree with the following statement



NCCN Trends™ Survey, March 2010

By provider type

REMS will allow drugs to be more quickly/easily FDA approved.



NCCN Trends™ Survey, March 2010

Today's Agenda

- **Part 1 Discussion and Roundtable**
  - Development, standardization, assessment of REMS
  - Medication Guides
  - Off-label drug use
- **Part 2 Discussion and Roundtable**
  - Education of Providers
  - Prescribing
  - Compensation
  - Patient issues
  - Implementation of REMS