

第13回抗悪性腫瘍開発フォーラム
「Revisiting JPN－全例調査」

**米国FDAが企業に要求する市販後研究
の現状**

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Agenda

I . 米国FDA再生法とREMS、PMR
(2つの事例について)

II . 日本における市販後調査とPMRの比較

III . 今後のあるべき姿について

FDA再生法における安全対策の動き

- FDAは製薬企業に対して、安全性に関わるRisk Evaluation and Mitigation Strategy (REMS)、Post Marketing Requirement (PMR)を果たす執行権限、添付文書を変更させる権限と罰則権限を得た。
- 承認後18ヶ月あるいは1万例以上が使用された後に、未知、あるいは潜在的リスク、既知であっても通常ではない数のADRについてのサマリー報告書を準備する。
- 安全性情報を迅速に伝えるウェブサイトを構築・提供する。
- FDAはリスクとベネフィットを広く公開する。
- FDA自らが連邦・民間のDBへアクセスすることによる能動的な安全性監視システムを確立する。
- 臨床試験は結果も含めてデータベースを構築する。

安全性リスク評価とリスク低減戦略 (REMS)の規制化

REMS (Risk Evaluation and Mitigation Strategies)

- 承認時に認められた重要なリスク(副作用)について、市販後のリスクの発生を最小限に抑えるために、「使用上の注意」での注意喚起以上に、何らかの追加の対策を施す計画
- FDAが医薬品のベネフィットがリスクを上回ることを確保することが必要と判断した場合、承認申請の一部としてREMSの提出を求める

REMSで用いられるリスク最小化策

- 特別に注意すべき事項(副作用の初期症状)を必ず患者さんに説明し、文書で伝える

⇒ Medication Guideの配布

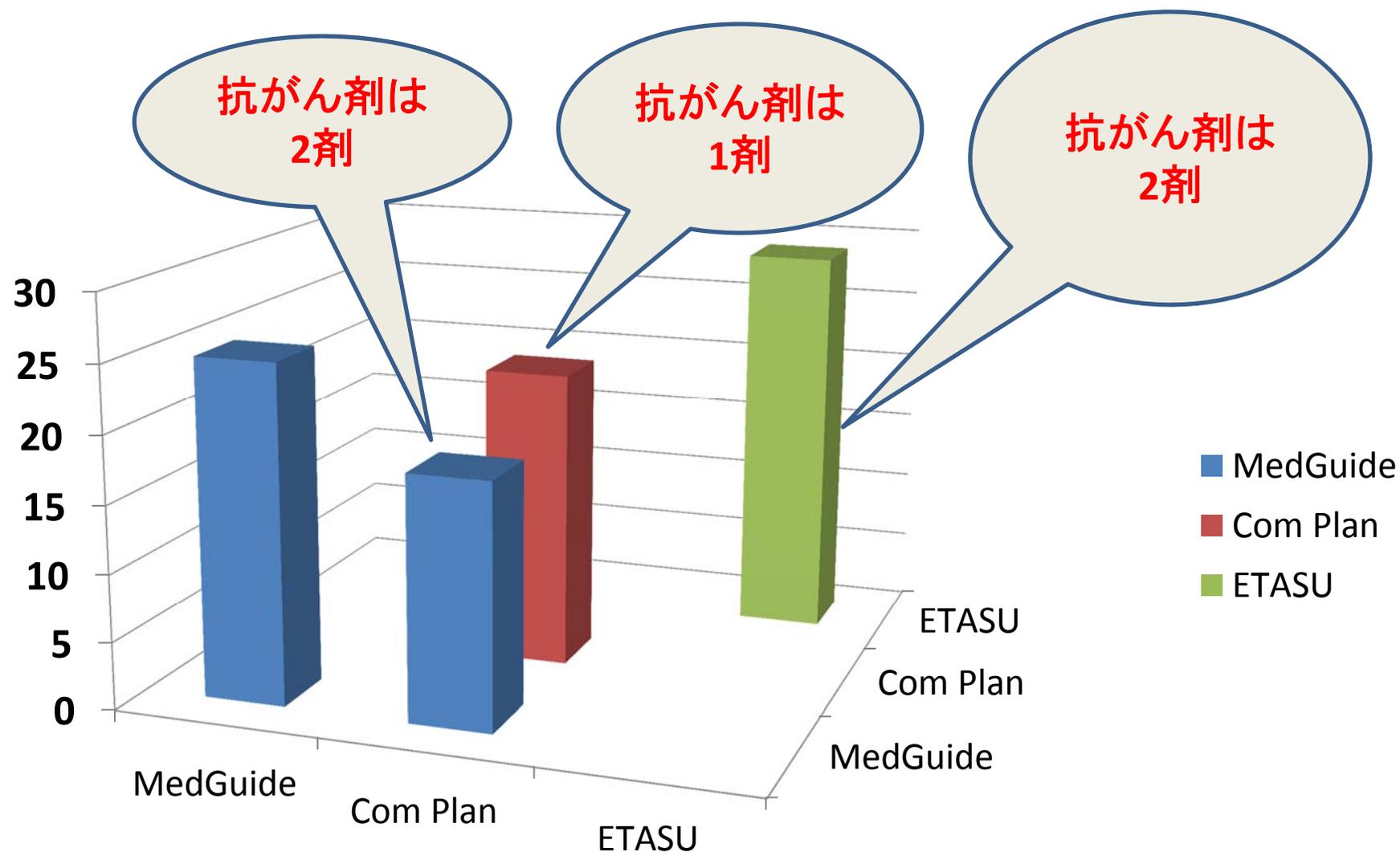
- 医療関係者に注意喚起の書類を配布したり、学会を通じて情報提供する(Dear Health Professional Letter配布、教育など)

⇒ Communication Plan

- 本来なら使用しづらい重篤リスクのある薬剤について、一定の要件を満たした場合にのみ、薬剤が供給される

⇒ Elements to Assure Safe Use (ETASU)

現時点(2012年6月)でのREMS



4剤のREMSの構成

薬剤名と効能	MedGuide	Com Plan	ETASU
TASIGNA (NILOTINIB) 慢性期または移行期CML	○	○	
CAPRELSA (VANDETANIB) 甲状腺髄様ガン	○	○	○
THALOMID (THALIDOMIDE) 多発性骨髄腫	○		○
Yervoy(Ipilimumab) 進行性メラノーマ		○	

Post Marketing Requirement (市販後研究の実施指示)

FDAは、以下の目的で市販後**研究**の実施を指示する権限が与えられた。

- 既知の重篤なリスクの評価
- 重篤リスクのシグナルの評価
- 未知の重篤なリスクの検出

企業は**研究**の予定 (Time Table) を提出し、途中経過は定期的に当局に報告しなくてはならない。



SEARCH

Most Popular Searches

- Home
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- Drugs
- Medical Devices
- Vaccines, Blood & Biologics
- Animal & Veterinary
- Cosmetics
- Radiation-Emitting Products
- Tobacco Products

Drugs

Home > Drugs > Drug Safety and Availability > Postmarket Drug Safety Information for Patients and Providers



Drug Safety and Availability

Postmarket Drug Safety Information for Patients and Providers

Index to Drug-Specific Information

Approved Risk Evaluation and Mitigation Strategies (REMS)

Drug Safety Information for Healthcare Professionals

Postmarket Drug Safety Information for Patients and Providers

In accordance with Section 915 of the Food and Drug Administration Amendments Act of 2007 (FDAAA), this website contains links to postmarket drug safety information to improve transparency and communication to patients and healthcare providers.

Studies and Clinical Trials of Approved Products

- [Postmarket Requirements and Commitments Search](#)
Searchable database of CDER and CBER commitments. (updated quarterly)

Spotlight

- [Guidance Outlines How FDA Communicates, Prioritizes Drug Safety Issues](#)
- [Memorandum of Agreement Between the Office of New Drugs and the Office of Surveillance and Epidemiology in the Center for Drug Evaluation and Research \(PDF - 32KB\)](#)

Latest Safety Information

- [Index to Drug-Specific Information](#)
For patients, consumers, and healthcare professionals, provides links to safety sheets with the latest risk information about particular drugs, related press announcements, and other fact sheets.

Recalls & Alerts

- [Import Alerts](#)
- [Recalls, Market Withdrawals, & Safety Alerts](#)
- [Warning Letters](#)

FDA HPより:

<http://www.fda.gov/Drugs/DrugSafety/PostmarketDrugSafetyInformationforPatientsandProviders/default.htm>



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Postmarketing Requirements and Commitments



[FDA Home](#) [Drug Databases](#) [PMRC](#)

[Introduction](#) | [FAQ](#)

Postmarketing requirement and commitment studies and clinical trials occur after a drug or biological product has been approved by FDA. A separate Web site is available for post approval studies for medical devices. For more information, please read: the [Guidance for Industry \(PDF - 456KB\)](#).

Center: Both CBER and CDER CBER CDER

Applicant:

Product:

NDA/ANDA/BLA Number:

Requirement/Commitment Status: [Status Definitions](#)

Required Under:

- Accelerated Approval
- Animal Efficacy Rule
- Pediatric Research Equity Act
- FDAAA Section 505(o)(3)

NDA/ANDA/BLA Approval Date: Date format: mm/dd/yyyy

From: To:

FDA HPより

<http://www.accessdata.fda.gov/scripts/cder/pmc/index.cfm>

PMRC Coordinator: pmrcweb@fda.hhs.gov

1 of 1 Application(s)/Supplement(s)

You searched for: Both CBER and CDER; tassigna; All Statuses; FDAAA Section 505(o)(3)

[First](#) | [Last](#)

Applicant	NOVARTIS PHARMACEUTICALS CORP
Product	TASIGNA (NILOTINIB, AMN107)
NDA/BLA Number	22068
Supplement Number	S-4
NDA/BLA Approval Date	10/29/2007
Annual Report Due Date (must be submitted within 60 days of this date)	10/29/2012
Annual Report Received	12/23/2011

Requirement/Commitment Number 1

Required Under	FDAAA Section 505(o)(3)
Original Projected Completion Date	08/31/2012
Description	A clinical trial to determine dosing regimens with a) H2 blockers and nilotinib, and b) antacids and nilotinib, that minimize alterations of the pharmacokinetics of nilotinib. You should include steps that dose H2 blockers and antacids at a specified period before nilotinib dosing, as well as at specified periods following nilotinib dosing.
Current Status	Delayed
Explanation of Status	Applicant submitted protocol on March 11, 2011. Applicant amended protocol July 29, 2011. Final protocol was due June 2011. Trial completion is due Jan 2012. Trial is ongoing. (Applicant changed trial completion date to Mar 2012 and Final report submission due date to August 2012.) Status for original Trial completion milestone is "Delayed." Next original milestone is the Final report due June 2012. Applicant mistakenly identifies the PMR as Commitment #8.

1 of 1 Application(s)/Supplement(s)

You searched for: Both CBER and CDER; tassigna; All Statuses; FDAAA Section 505(o)(3)

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Page Last Updated: 07/31/2010

Note: If you need help accessing information in different file formats, see [Instructions for Downloading Viewers and Players](#).

REMS: TASIGNA (NILETINIB)

I GOAL(S)

The goals of the REMS are to:

- Minimize the occurrence of QT prolongation and its potential cardiac sequelae.
- Reduce medication errors involving drug-food interactions and incorrect dosing intervals.
- Minimize potential interactions (drug-drug and disease-drug).
- Inform patients about the serious risks associated with Tasigna treatment.
- Inform healthcare providers about the serious risks associated with the use of Tasigna, including QT prolongation.

REMS: TASIGNA (NILOTINIB)

REMS ELEMENTS

A Medication Guide

B Communication Plan

- 1) Within 3 months of approval of the REMS and quarterly thereafter, Novartis will hand deliver and discuss educational materials with likely Tassigna prescribers; that is, the approximately 6,900 US prescribers who treat patients for chronic myelogenous leukemia (CML).
- 2) Where access to the likely prescriber is not available for hand delivery of the materials, the materials will be delivered to the likely prescriber by shipment;
- 3) In cases of shipment of materials, Novartis will attempt to make direct follow-up contact with the prescriber to discuss the REMS materials;

PMR : TASIGNA (NILOTINIB)

To submit the complete study report (with at least 24 months follow-up of all patients) and data from study 2101, a phase 2 multicenter study of nilotinib in patients with imatinib resistant or intolerant chronic myeloid leukemia in chronic and accelerated phases respectively (arms 4 & 3, respectively). ⇒ Subpart H completed?

Submit the completed study report and datasets for hepatic impairment study. ⇒ Completed?

Conduct a relative bioavailability study (using a liquid formulation as the reference).

Conduct a clinical study or studies to evaluate whether multiple doses of nilotinib alter the metabolism of a sensitive CYP2C9 substrate (for example, S-warfarin). If a significant interaction is demonstrated, additional clinical studies may be needed to evaluate whether multiple doses of nilotinib alter the metabolism of a sensitive CYP2C8 substrate (for example, repaglinide) and/or a sensitive CYP3A4 substrate (for example, midazolam).

FDA HPより

<http://www.accessdata.fda.gov/scripts/cder/pmc/index.cfm>

REMS: CAPRELSA (VANDETANIB)

I. GOALS

The goals of the CAPRELSA REMS are:
to educate prescribers about the risk, appropriate monitoring, and management of QT prolongation to help minimize the occurrence of Torsades de pointes and sudden death associated with CAPRELSA.
to inform patients about the serious risks associated with CAPRELSA.

REMS: CAPRELSA (VANDETANIB)

II. REMS ELEMENTS

A. Medication Guide

B. Communication Plan

1. *A Dear Healthcare Provider (HCP) Letter to be distributed at least 1 week prior to first availability of CAPRELSA to healthcare providers. The target audience will include medical oncologists, endocrinologists, and surgeons.*

2. *AstraZeneca will communicate via a Dear Professional Society Letter to the leadership of the following professional societies and request that these societies disseminate this information to their members: · American Society of Clinical Oncology (ASCO) · American Thyroid Association (ATA) · National Comprehensive Cancer Network (NCCN) · Oncology Nursing Society (ONS)*

REMS: CAPRELSA (VANDETANIB)

C. Elements to Assure Safe Use

1. Healthcare providers who prescribe CAPRELSA are specially certified.
 - a. AstraZeneca will ensure that healthcare providers who prescribe CAPRELSA are specially certified.
 - b. To become certified to prescribe CAPRELSA, prescribers will be required to enroll in the CAPRELSA REMS Program
2. CAPRELSA will only be dispensed by pharmacies that are specially certified.

PMR: CAPRELSA (VANDETANIB)

To evaluate the potential for a serious risk of carcinogenicity, conduct a long-term (2 year) rodent carcinogenicity study in the rat. Submit the carcinogenicity protocol for a Special Protocol Assessment prior to initiating the study.

To evaluate the potential for a serious risk of carcinogenicity, conduct a rodent carcinogenicity study in the **mouse**. Submit the carcinogenicity protocol for a Special Protocol Assessment prior to initiating the study.

Conduct a randomized dose-finding trial in which patients with progressive or symptomatic medullary thyroid cancer will be randomized to vandetanib 300 mg or 150 mg daily. The trial will include analyses of the safety and activity of the 150 mg dose of vandetanib. Safety assessments will include evaluations of vortex keratopathy and corneal stromal changes, with ophthalmology examination every 6 months with corneal photographs of abnormalities. Safety assessments will also include evaluation of heart failure using serial echocardiograms in all patients. A primary endpoint will include overall response rate.

Submit the results of the final analysis of overall survival data from the randomized clinical trial of vandetanib 300 mg vs. placebo in medullary thyroid cancer (Study 58).

FDA HPより

<http://www.accessdata.fda.gov/scripts/cder/pmc/index.cfm>

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米国におけるPostmarketing Requirement と日本の市販後の研究比較と提言

—タスクフォースからの提言

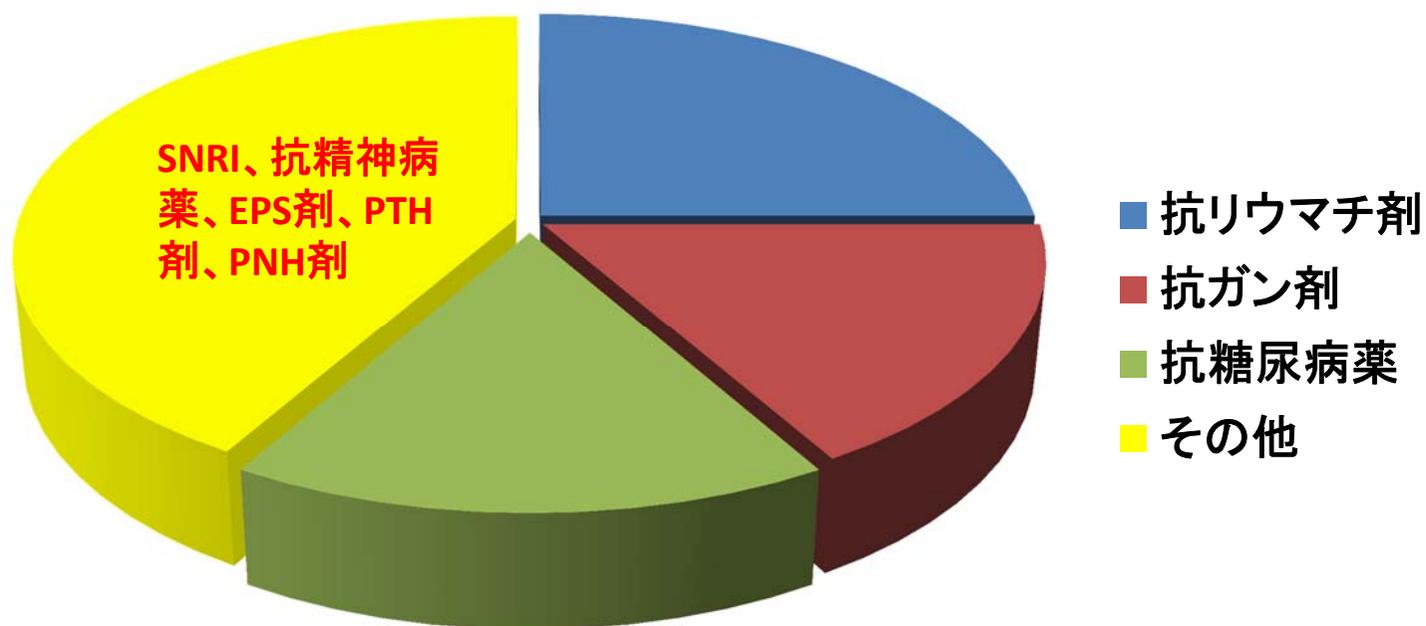
日本イーライリリー株式会社¹⁾、参天製薬株式会社²⁾、東京大学薬学³⁾、東京大学医学部⁴⁾、東京大学大学院薬学⁵⁾、品工業⁶⁾、PhRMA Japan⁷⁾、福井医科大学⁸⁾、株式会社⁹⁾

○古閑 晃¹⁾、甲斐 靖彦²⁾、景山 茂³⁾、久保田 潔⁴⁾、谷 善一郎⁵⁾、西 利道⁶⁾、前田 玲⁷⁾、政田 幹夫⁸⁾、宮川 功⁹⁾

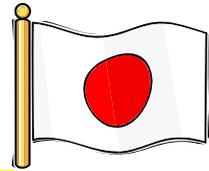
新薬全般に関する提言で、抗がん剤について特化したものではありません。

結果

検討品目の内訳（12剤）



T細胞選択的共刺激調節剤(抗リウマチ剤)



安全性監視計画

安全性検討事項

安全性監視計画

長期特別調査(3年)

重篤感染症

悪性腫瘍

心不全

自己免疫性疾患

間質性肺炎

脱髄疾患

汎血球減少

再生不良性貧血

投与部位反応

全例調査

重篤感染症

感染症で入院するRA患者を他のDMARDs投与患者と比較する長期の薬剤疫学研究を実施する。

悪性腫瘍

既存のRA Registry中の他のDMARDsと比較して短期および長期投与後の悪性腫瘍と感染症を検討するコホート研究

長期安全性

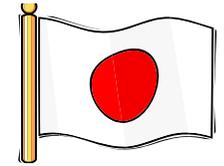
オープンラベルでの5試験を継続し、5年の曝露における安全性の分析を行う。

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最良の姿にするための提案：全例調査

- 全例調査実施に当たっては、調査が目的であるのか、リスク最小化が目的であるかを明確にすべき、すなわち、薬品安全計画でも示されている「安全」の観点からリスク最小化が目的であること。但し、Tasignaのような希少疾病用医薬品では、市販後の早い段階で情報を集積することは重要である。
- 画一的な観点から有効であるか、実施の負担を増やすことを考えると全例である必要はなく、根拠に基づいた症例数と比較群の有無を検討すべき。

医薬品リスク管理計画書指針より 安全性監視計画のあり方、基本とは



4. 2 追加の医薬品安全性監視活動

安全性検討事項を踏まえて、追加の医薬品安全性監視活動の必要性、その理由、手法等について検討の上、その実施体制とともに要約する。医薬品安全性監視活動の手法については、医療情報データベースを活用した薬剤疫学的手法も含め、ICH E2Eガイドラインの別添「医薬品安全性監視の方法」を参照するほか、以下のことも考慮する。

(略)

- 当該医薬品の適応となる患者集団において、**原疾患やその合併症の自然経過といった背景の中で発現率の高い有害事象がある場合には、それが当該医薬品による副作用等との鑑別が困難なこともある。そのような場合にも、追加の医薬品安全性監視活動の必要性を検討する。**



ところでICH E2E（医薬品安全性監視の計画）とは？ （平成17年9月16日2課長通知より）

3.2 医薬品安全性監視の方法

特定の状況における安全性監視に取り組む最良の方法は、**医薬品、適応疾患、治療対象の集団及び取り組むべき課題**によって異なる。また、選択した方法は、特定されたリスク、潜在的なリスクあるいは不足情報の何れを目的としているのか、或いは、シグナル検出、評価あるいは安全性の立証が研究の主目的であるのかによって異なる。安全性の課題に対処するための方法を選択する際には、企業は最も適切なデザインを使用すべきである。

まとめ

- 米国では、医療側、患者さんに負担のかからない範囲で市販後の安全対策 (REMSとPMR) が科学的に実施されている。
- 日本では、画一的な方法で安全性の監視が行われていた。抗がん剤では全例調査が多く、これはあくまで探索的な研究とリスク最小化策を兼ね備えたもので、その意義はあるが、ベネフィット・リスク評価に影響するようなリスクに特化した監視の方法や True endpoint の評価を今後は期待する。
- 日本では医薬品安全性管理指針が新たに来年より実装されるが、これにより真のリスク管理が将来的には期待できる！

ご静聴ありがとうございました。



Back UP

PMR: Yervoy, Ipilimumab その1

To submit the final report for study DN120020 (Intravenous Study of Pre- and Post-natal Developmental in Cynomolgus Monkeys with a 6-Month Post-natal Evaluation).

To develop a validated, sensitive, and accurate assay for the detection of binding antibodies to ipilimumab, including procedures for accurate detection of antibodies to ipilimumab in the presence of ipilimumab levels that are expected to be present in the serum or plasma at the time of patient sampling.

To develop a validated, sensitive, and accurate assay for the detection of neutralizing antibodies to ipilimumab, including procedures for accurate detection of neutralizing antibodies to ipilimumab in the presence of ipilimumab levels that are expected to be present in the serum or plasma at the time of patient sampling. In the event such an assay can not be developed, evidence of due diligence in attempting to develop the assay will be provided.

To conduct an assessment of anti-drug antibody (ADA) response and neutralizing ADA responses to ipilimumab with a validated assay (required in PMR 2 and 3) capable of sensitively detecting ADA responses in the presence of ipilimumab levels that are expected to be present at the time of patient sampling. The ADA response will be evaluated in at least 300 ipilimumab-treated patients enrolled in the required postmarketing trial (PMR 6) comparing 3 mg/kg versus 10 mg/kg of ipilimumab monotherapy. The final report will include information on the level of ipilimumab in each patient's test sample at each sampling time point.

PMR: Yervoy, Ipilimumab その 2

During the conduct of the required postmarketing trial comparing 3mg/kg vs. 10mg/kg ipilimumab monotherapy (PMR 6), you will obtain comprehensive baseline DNA sample acquisition (? 95% of ITT) and conduct **pharmacogenomic association analyses to assess the potential clinical utility of CD86 gene polymorphisms as genetic determinants of immune mediated adverse events**. You will provide a protocol that addresses SNP selection, data analyses approaches, and other methodological issues. You will provide a Final Report including electronic datasets.

Following the assessment of data from Trial CA184024, you will design and conduct a trial to **compare the efficacy, with the primary endpoint of overall survival and the safety of ipilimumab at doses of 3mg/kg versus 10mg/kg** given as monotherapy every three weeks for four doses in patients with unresectable Stage III or Stage IV melanoma.

To **identify further genetic determinants of immune-mediated adverse events** caused by ipilimumab. DNA samples from the required postmarketing study comparing 3 mg/kg vs. 10 mg/kg ipilimumab monotherapy will be used to conduct genome-wide association analyses. The design of these analyses will be reviewed by FDA and a final report with electronic datasets will be provided.

PMR: THALOMID (THALIDOMIDE) 50MG CAPSULES

Submit the clinical study report for THAL-MM-003, A Randomized Phase III Trial of Thalidomide Plus Dexamethasone Versus Dexamethasone in Newly Diagnosed Multiple Myeloma, as noted in approval letter.

Conduct an epidemiologic study (An Epidemiology Study of Venous Thrombotic Events in Thalidomide Treated Multiple Myeloma Patients) to address the questions detailed below: Safety questions 1. What is the failure rate for each of the different types of thromboembolic prophylaxis (e.g., antiplatelet or anticoagulant therapy) for MM patients treated with a thalidomide-containing regimen? 2. What is the failure rate for each type of DVT treatment (dose-adjusted heparin, low molecular weight heparin, coumadin) for those patients with MM and a DVT who continue to receive ongoing treatment with thalidomide? 3. What is the failure rate for each type of post-DVT thromboembolic prophylaxis for those patients with MM and a DVT who continue to receive ongoing treatment with thalidomide?

This prospective epidemiologic study will enroll select patients identified in the S.T.E.P.S. program, and collect the necessary additional data on these patients to further evaluate occurrences of thrombosis and anticoagulant use. The final details of the design will be as agreed between the Agency and Celgene.