Evaluating FDA Communications to Reduce Counterfeit and Unapproved Drugs in the Clinical Setting

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Risk Communication Advisory Committee Meeting
August 16, 2013

Objectives

- Define counterfeit and unapproved drugs
- Describe public health concern with counterfeit and unapproved drugs
- Describe FDA/CDER/OC/ODSIR's role
- Describe drug supply chain (legitimate distribution)
- Explain the current problem: unsafe buying practices by medical clinics
- Describe what CDER has done to notify or raise awareness of the issue (i.e. doctor letters, public alerts, stakeholder outreach)
- List our communication objectives
- Describe the complexities of counterfeit/unapproved issue that have created challenges in our communications
- Describe possible qualitative info that may help in assessing effectiveness of communications

What is a counterfeit drug?

- Lay Interpretation: “Counterfeit medicine is fake medicine.”
- U.S. law defines counterfeit drugs as:
  - “drug which, or container or labeling of which, without authorization, bears the trademark, trade name, or other identifying mark, imprint, or device, or any likeness thereof, of a manufacturer, processor, packer, or distributor other than the person or persons who in fact manufacture, processed, packed, or distributed such drug and which thereby falsely purports or is represented to be the product, or to have been packed or distributed by, such other drug manufacturer, processor, packer, or distributor.”

- Can apply to both brand name and generic products, or the bulk ingredients used to make the product.

- May include products without the active ingredient, with an insufficient or excessive quantity of the active ingredient, with the wrong active ingredient, or with fake packaging.

What is an unapproved drug?

- Unapproved drug
  - does not have an FDA-approved application for marketing in the U.S.
  - is not consistent with current law and regulations and have not been shown to be safe and effective

  For purposes of this meeting, unapproved drug include:
  - a foreign-approved version of an FDA-approved drug
  - a version with foreign labeling with no approval status in another country
  - A counterfeit drug is as an unapproved drug, however an unapproved drug is not always a counterfeit.

- We will not be discussing:
  - Using an FDA-approved drug for an unapproved use (off-label use)
  - Marketed unapproved drugs: Unapproved Drug Initiative: http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/EnforcementActivitiesbyFDA/SelectedEnforcementActionsonUnapprovedDrugs/ucm118990.htm

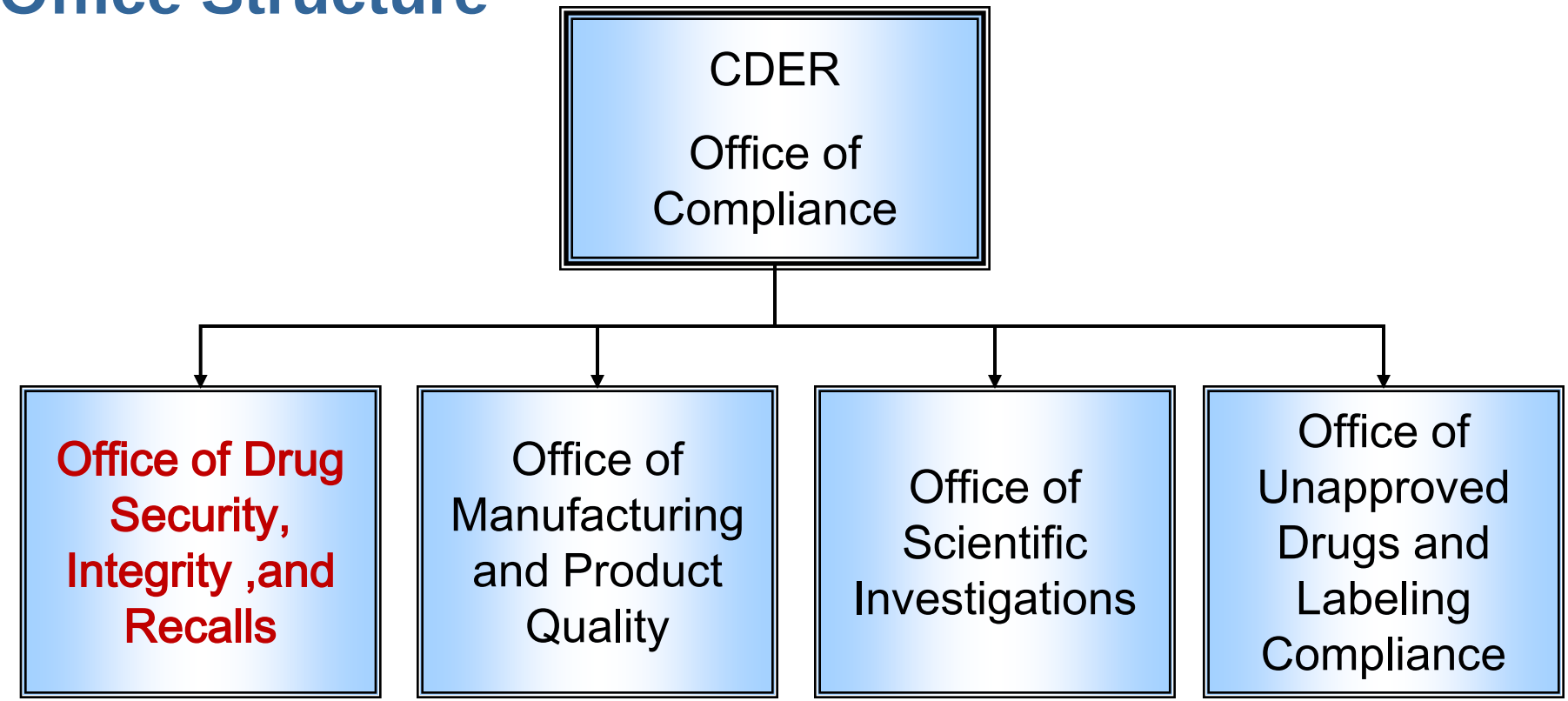
Public Health Concerns

Counterfeit or Unapproved drugs may:

- contain harmful ingredients
- be ineffective (contain no or little drug)
- cause adverse events (due to ingredients or wrong strength)
- have lost potency (due to improper storage)
- be expired
- be produced under filthy conditions
- not have proper labeling for appropriate and safe use
  (ex. missing important warnings, precautions, or patient information; in a foreign language; list the wrong strength or active ingredient…etc.)

FDA's CDER Office of Compliance

Office Structure

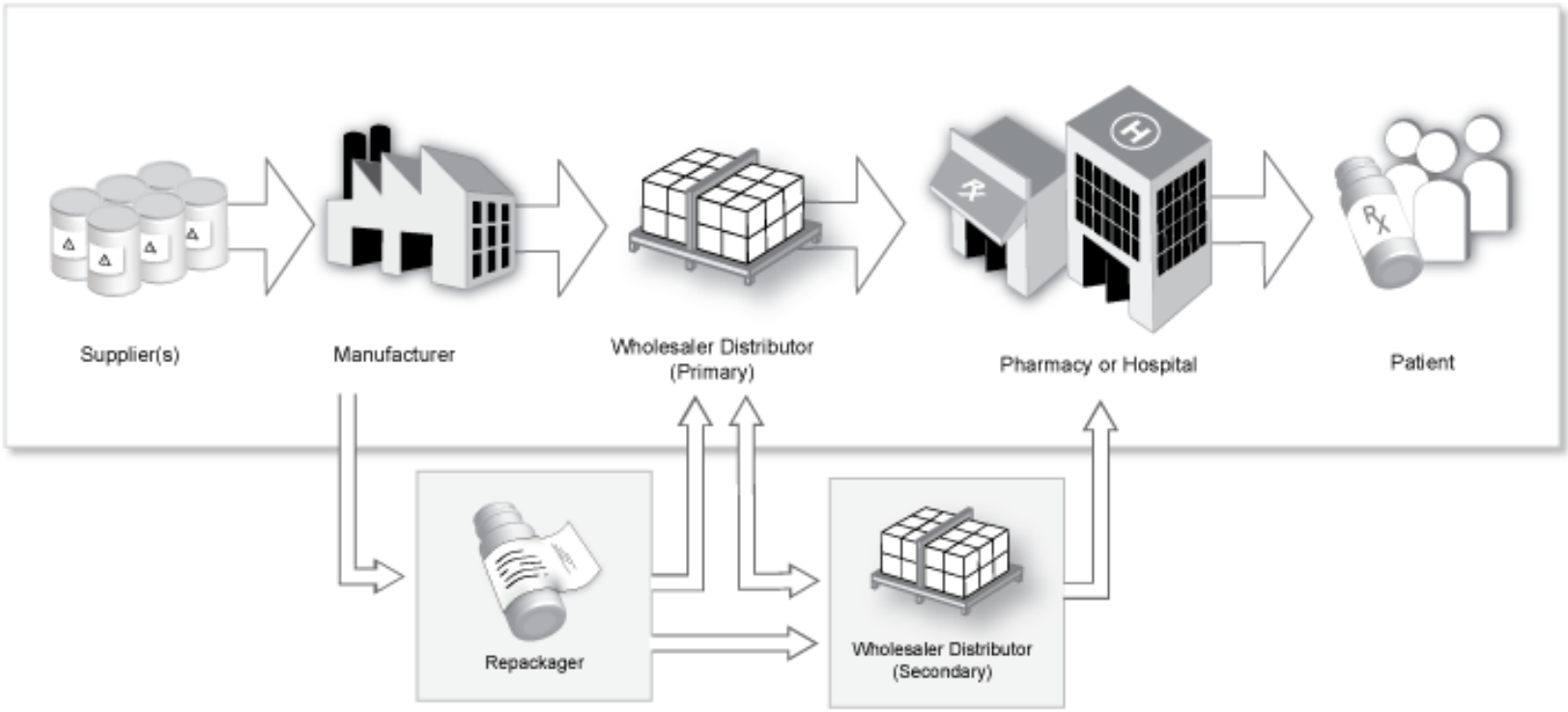


Office of Drug Security, Integrity, and Recalls (ODSIR)

- Enhanced and targeted resources
- Address increasing supply chain threats
  - Intentional adulteration, cargo theft, counterfeiting, diversion, other
  - Focus on life-cycle of the product from drug components through to the finished dosage form delivered to the patient
- New and coordinated approaches, policies and enforcement strategies
- Divisions and Branches cover the following areas:

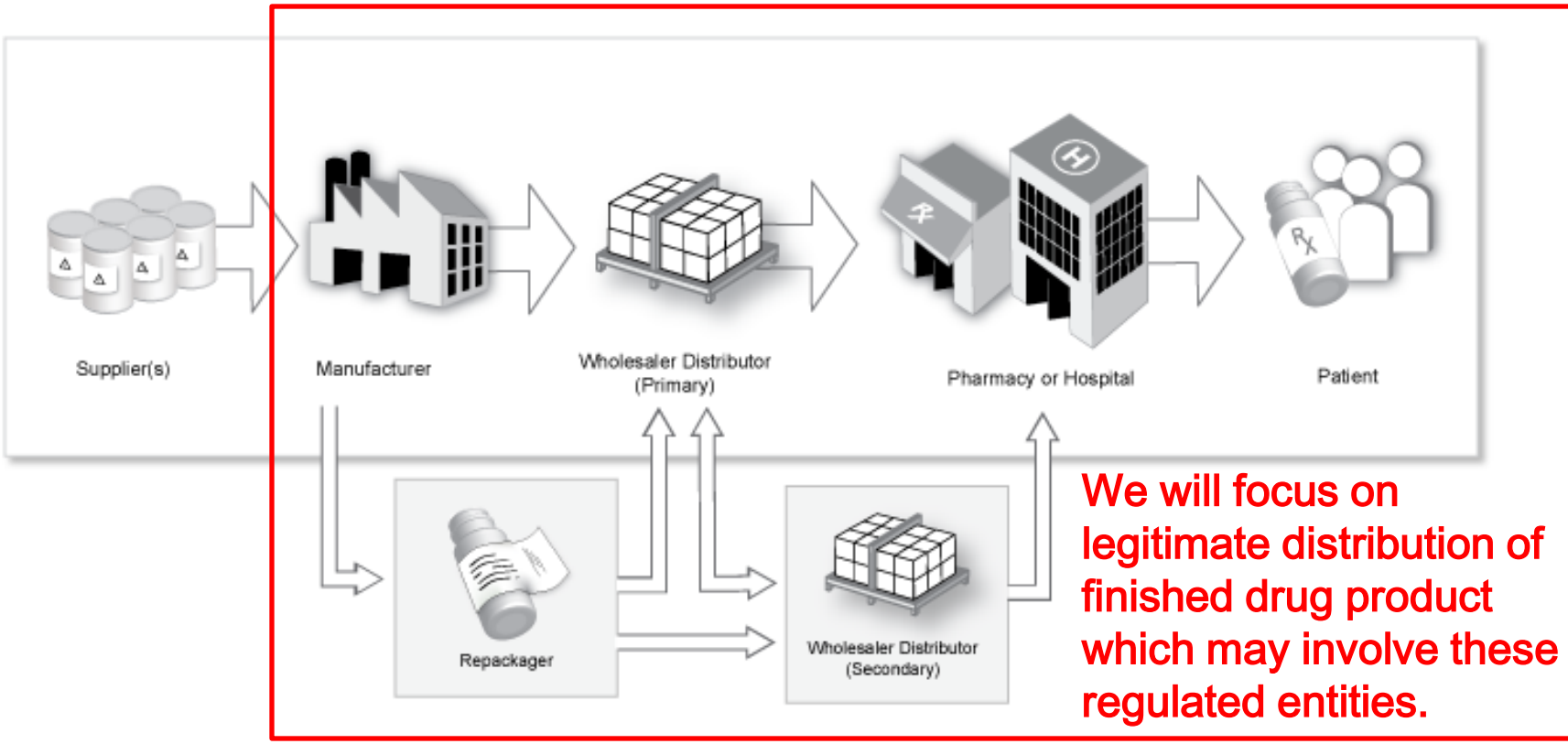
Recalls **Drug Shortages**	**Imports** **Exports**	**Drug Supply Chain Integrity**

Drug supply chain model



This graphic shows an example of the supply chain entities that may be involved in the manufacture and distribution of prescription drugs before the drugs are given to patients. The drug supply chain may include suppliers of components, a manufacturer, primary and secondary wholesale distributors, repackagers, and a pharmacy or hospital.

Drug supply chain model



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Current problem – example of scheme

Medical clinic/Doctor's Office

Orders/Purchases Product

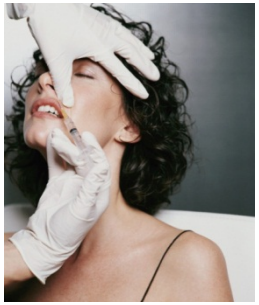
Foreign/unlicensed supplier

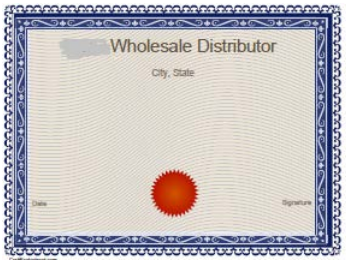
Ships product to medical clinic

Medical clinic/doctor's office

Receives shipment of product

Doctor administers to patient





Licensed wholesale distributor

Current problem – example of scheme

Medical clinic/Doctor's Office

Orders/Purchases Product

Foreign/unlicensed supplier

Ships product to medical clinic

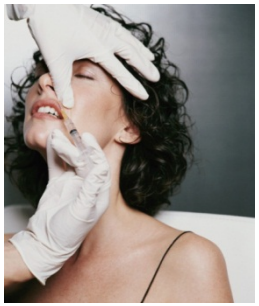
UNSAFE PURCHASING PRACTICES

PRODUCT IS DIRECTLY SHIPPED TO MEDICAL CLINIC/DOCTOR

Medical clinic/doctor's office

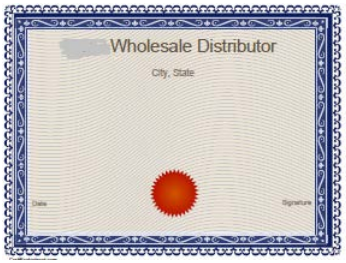
Receives shipment of product

Doctor administers to patient



PATIENT COULD BE HARMED BY COUNTERFEIT/ UNAPPROVED DRUGS

- sophisticated marketing by suppliers
- purchasing outside of the legitimate supply chain



Licensed wholesale distributor

Recent U.S. Supply Chain Breaches

- Counterfeit Avastin
- Counterfeit Altuzan
- Fraudulent Botox

Assumptions

Medical clinics/doctors:

- may not realize they are buying unapproved or counterfeit drugs
- may not realize they are buying from a foreign or unlicensed supplier
- may not be aware of tactics and schemes of the foreign or unlicensed suppliers
- may not be aware of possible signs that they do not have an FDA-approved product
- may not know what to do if they have product from a named suspect supplier

Letters to Doctors

- Sent to medical practices in the U.S.
- Warned against the use of counterfeit and unapproved drugs
- Provided info describing the counterfeit or unapproved drug(s) found in the U.S. supply chain
- Described risks of purchasing from foreign and unlicensed sources
- Named questionable supplier(s)
- Urged medical practices to stop using any products from any foreign or unlicensed suppliers
- Encouraged reporting adverse events to MedWatch
- Provided recommendations for how to reduce the chance of buying from a foreign or unlicensed source*
- Provided tips on how to identify a suspect unapproved product*
- Letters are currently posted on FDA's website

*This information was added to letters issued in 2013.

Communication Objectives for Letters to Doctors

- Increase health care providers' awareness of the potential health risks to patients associated with administering counterfeit and unapproved drugs
- Increase health care providers' awareness of safe purchasing practices to minimize the chance of receiving a counterfeit or unapproved drug
- Encourage health care providers to use safe purchasing practices

Public Alerts

Drug Safety and Availability

- Drug Alerts and Statements
- Importing Prescription Drugs
- Medication Guides
- Drug Safety Communications
- Drug Shortages
- Postmarket Drug Safety Information for Patients and Providers
- Information by Drug Class
- Medication Errors
- FDA Drug Safety Newsletter
- Drug Safety Podcasts
- Safe Use Initiative
- Drug Recalls
- Drug Integrity and Supply Chain Security

Counterfeit Version of Avastin in U.S. Distribution

Statement Issued: Feb. 14, 2012

FDA sends letters to 19 medical practices about counterfeit product and other unapproved cancer medicines

The U.S. Food and Drug Administration (FDA) is warning health care professionals and patients about a counterfeit version of Avastin 400mg/16mL, which may have been purchased and used by some medical practices in the United States. Avastin is an injectable medicine used to treat cancer and is administered to patients in clinics, hospitals, and doctors' offices. The counterfeit version of Avastin does not contain the medicine's active ingredient, bevacizumab, which may have resulted in patients not receiving needed therapy.

In a related action, FDA has issued letters to 19 medical practices in the United States that purchased unapproved cancer medicines that may include the counterfeit Avastin. The counterfeit version is labeled as Avastin, manufactured by Roche. Roche is the company that manufactures Avastin approved for marketing outside of the United States.

Roche conducted laboratory tests that confirmed the counterfeit version of Avastin. Packages or vials may be counterfeit if they:

- are labeled with Roche as the manufacturer
- display batch numbers that start with B6010, B6011 or B86017

The only FDA-approved version of Avastin for use in the United States is marketed by Genentech (a member company of Roche). The FDA-approved version does not include the Roche logo on the packaging or vials. In addition, Genentech's FDA-approved version of Avastin vials and packaging have a 6-digit numeric batch number and expiration dates in a 3-letter month and 4-digit year format (e.g., JAN 2014). Genentech's Avastin products are safe and effective for their intended uses.

The 19 medical practices in the United States purchased unapproved cancer medicines and, potentially, the counterfeit Avastin, from Quality Specialty Products (QSP), a foreign supplier that may also be known as Montana Health Care Solutions. Volunteer Distribution in Gainesboro, Tennessee is a distributor of QSP's products. FDA has requested that the medical practices stop using any remaining products from these suppliers. FDA cannot ensure the safety or efficacy of any of these unapproved products.

- Letters to Doctors About Purchasing Unapproved Injectable Cancer Medications

Based on information to date, FDA has determined that none of the unapproved cancer medicines received by these medical practices from Volunteer Distribution are in shortage in the United States. FDA-approved

Communication Objectives for Public Alerts

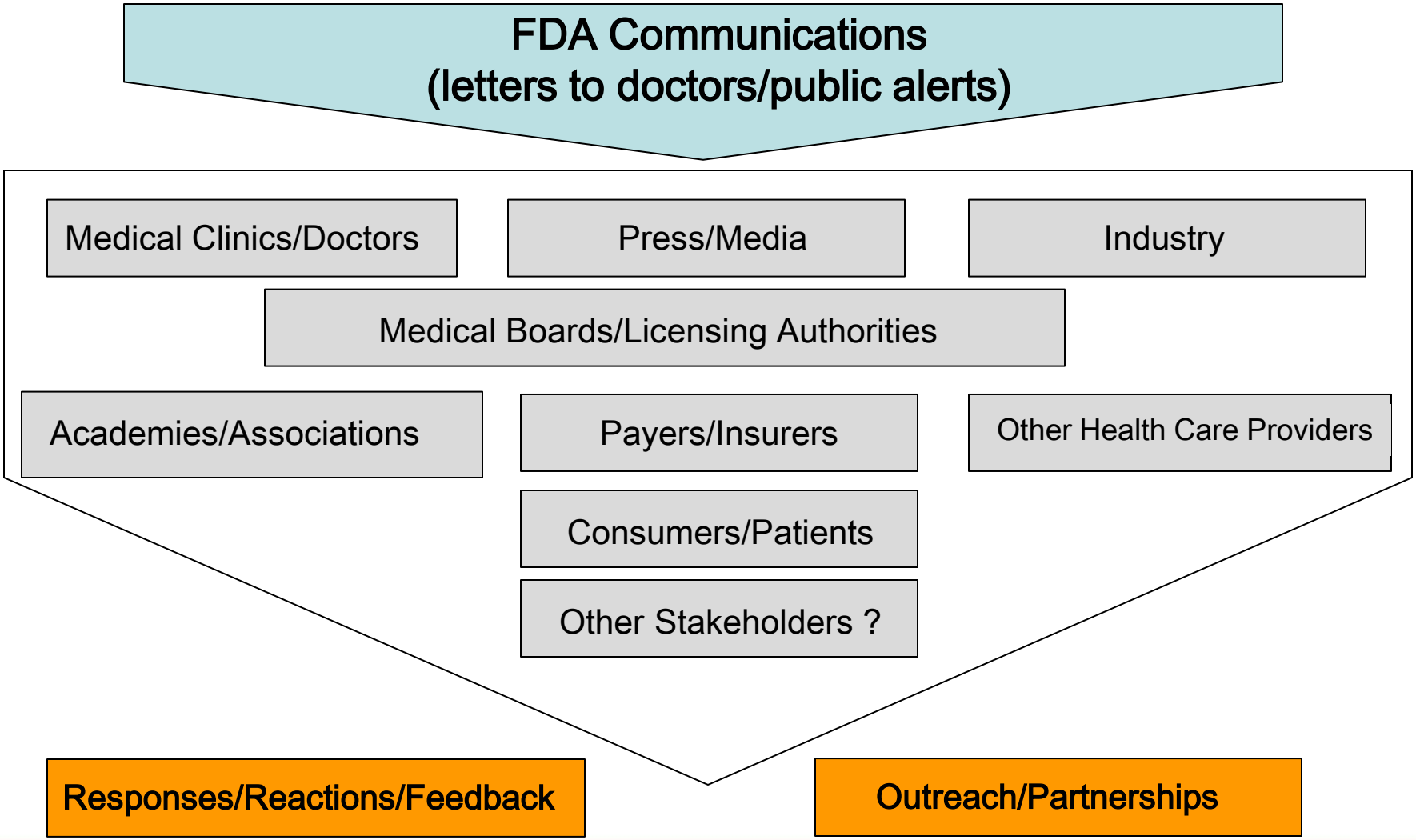
- Increase awareness of consumers and other stakeholders (other healthcare providers, insurers, professional organizations) of the public health risks associated with counterfeit and unapproved drugs
- Increase awareness of consumers and other stakeholders (other healthcare providers, insurers, professional organizations) of safe purchasing practices to minimize the chance of receiving a counterfeit or unapproved drug

Challenges – Complex messages

- Alerting HCPs of public health risk
- Notifying public of the health risk – without causing unnecessary alarm
- Conveying the dangers of counterfeit and unapproved drugs (at the same time)
- Educating HCPs about safe buying practices
- Educating HCPs about possible signs of an unapproved or counterfeit drug
- Optimizing the timing of the alert to give warning without compromising any investigation

(HCP = health care provider)

Impact of Communications



Thank you for your attention!