PDUFA IV

An Advocacy Perspective

November 2005

Why do we care?

- Cancer is the leading cause of death in the U.S. for people under age 85.
- This year, about 1.3 million diagnoses and roughly 570,000 deaths
- Cancer patients need better tools for diagnosis, prevention, and treatment…and they need them now.
- The research and development pipeline holds great promise for new discoveries.
- Hundreds of new cancer drugs and biologics are in development, many based on cutting edge advancements in our molecular understanding of the disease
- How well and how quickly FDA operates is critical to the NCI's 2015 Goal.

PDUFA: The Basics

- Supplemental resources to FDA to augment federal appropriations
- Shorter review times for standard applications and even shorter review times for priority drugs
- Improved communication between FDA and industry
- Measurable goals to evaluate FDA's performance
- Predictability of the regulatory process

Evaluating PDUFA

- Do PDUFA fees obligate the FDA to approve certain drugs?
- A decrease in NDA review time has not translated into more applications being approved. Rather, the average application is being approved, or denied, at a faster rate.
- PDUFA is not a fee for approval, but a fee to offset review costs.
- Do faster approval times compromise drug safety?
- A study by scholars at the National Bureau of Economic Research found no significant differences in the rates of safety withdrawals for drugs approved before PDUFA compared to drugs approved during the PDUFA era.
- These concerns are enormously relevant now as concerns mount over drug safety

PDUFA III and Drug Safety

- PDUFA III allowed FDA to expend user fees for risk management activities and post-market safety review.
- Added staff in the Office of Drug Safety.
- Helps FDA better understand a drug's risk profile, provide risk feedback to the sponsors and provide essential safety information to patients and health practitioners.

An Advocacy Perspective on Safety Concerns

- No drug is 100% safe and 100% effective for 100% of patients
- Large variations in risk/benefit profiles for patients and diseases
- Decision about the appropriate balance between benefit and risk are largely in the hands of the individual patients and their care givers
- Patients and care givers need access to timely and accurate information to make informed decisions
- Limits exist to the level of certainty that can be achieved
- What is the appropriate balance between speed and certainty?

Ideas for Safety Reform

- Collect more data on safety and efficacy from patients using approved drugs through patient registries
- Enhance the Med Watch system for reporting adverse events
- Increase the FDA's capacity to process and analyze adverse event and other post market data
- Get information about emerging patterns of risk and benefits to patients and prescribers as quickly and effectively as possible

Looking ahead to PDUFA IV

- Finding ways to further accelerate the review process without compromising the scientific rigor of the process remains an important priority for patients and researchers.
- Efforts to enhance safety systems should not compromise the timely approval that many patients facing life-altering diseases need.
- Adequate funding is essential to the FDA's success
- PDUFA should only be a supplement to adequate congressional appropriations. Flat funding of FDA over the years has resulted in a growing reliance on PDUFA fees.

Adequate Resources?

- New initiatives to improve the evaluation of both safety and efficacy need to be adequately resourced.

  Concern: without adequate funding, dollars shifted toward implementing new regulations and infrastructure for safety could hinder other programs that may be of value to patients.

- Considerations
  - Could PDUFA revenues come from sources other than industry?
  - Increased appropriations for expanding the FDA's scientific capacity?
  - Increased appropriations for the FDA as a whole?

The Times are Changing

- New knowledge of genetics is improving the processes of drug discovery, development and regulation, and optimize drug therapy.
- Understanding the genetics of drug response and toxicity will guide the development of targeted drugs that are safer and more effective.
- To speed these discoveries to patients, FDA must be optimally equipped to evaluate the most advanced approaches (e.g., combination therapies, biomarkers, nanotechnology).
- FDA's Critical Path Initiative could dramatically increase product development
  - Update the tools currently used to assess the safety and efficacy of new medical products.
  - An effort "to coordinate, develop, and/or disseminate solutions to scientific hurdles that are impairing the efficiency of product development industry-wide."

A Stronger FDA

- Predictability and consistency of the application and review process is essential
- Efforts to bring even greater efficiency and scientific expertise to the FDA's review and monitoring processes must continue.
- Maintaining and enhancing scientific and clinical rigor is essential
- Increase FDA's level of support for innovation and public-private partnerships (perhaps through a dedicated office at FDA).