FDA Update: 2018

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The opinions and information in this presentation are my own and do not necessarily reflect the views and policies of the FDA.
Outline

• Larger healthcare context:
  – Trends in medical products, including consumer products
  – Opioid crisis

• FDA response
  – Opioids
    • Drug Disposal
    • Loperamide
  – OTC User Fees
  – NSURE
Overall Message

• Regulation of consumer products by FDA is responding to trends in US healthcare as well as larger issues confronting public health

• Continued progress will require continued collaboration to support the timely development of safe, effective and innovative consumer products
Trends Impacting Medical Product Regulation and Use

• Trend towards targeted therapies and therapies combined with devices/software
• Trend towards more patient involvement in their health
• Focus on the broader public health impact of products as a part of overall benefit-risk assessment
  – Prescription Opioid abuse and misuse
Increases in Drug Overdose Deaths

Drugs Involved in U.S. Overdose Deaths, 2000 to 2016

Drugs Involved in U.S. Overdose Deaths™ - Among the more than 64,000 drug overdose deaths estimated in 2015, the sharpest increase occurred among deaths related to fentanyl and fentanyl analogs (synthetic opioids) with over 20,000 overdose deaths. Source: CDC WONDER

Nationally Estimated Number of Prescriptions Dispensed for Opioid Analgesics Products from U.S. Outpatient Retail Pharmacies

*Immediate-Release formulations include oral solids, oral liquids, rectal, nasal, and transmucosal
**Extended-Release/Long-Acting formulations include oral solids and transdermal patches

Note: Include opioid analgesics only, excluding injectable formulations as well as opioid-containing cough-cold products and opioid-containing medication-assisted treatment (MAT) products
"Unquestionably, our greatest immediate challenge is the problem of opioid abuse. This is a public health crisis of staggering human and economic proportion ... we have an important role to play in reducing the rate of new abuse and in giving healthcare providers the tools to reduce exposure to opioids to only clearly appropriate patients, so we can also help reduce the new cases of addiction."

- Scott Gottlieb, FDA Commissioner
Address to FDA staff, May 15, 2017
Responding to Challenges: The Opioids Crisis
FDA Will Use all of its Tools to Address the Opioid Crisis

• Improving the development and safety of drugs by careful and appropriate regulatory activities
• Improving the safe use of drugs by careful and appropriate policy development
• Improving product development by improved science
• Improving the safe use of drugs by communication, partnership and collaboration
The Opioid Crisis: FDA’s Priorities & Strategies

1. Decreasing Exposure & Prevent New Addiction
   - Appropriate Dose/Duration Labeling
   - Appropriate Packaging, Storage, and Disposal
   - Health Care Provider

2. Supporting the Treatment of Those With Opioid Use Disorder
   - Naloxone
   - Medication Assisted

3. Fostering the Development of Novel Pain Treatment Therapies
   - Partnerships & Meetings
   - Abuse Deterrent Formulations (ADFs)
   - Pain Treatment Alternatives

4. Improving Enforcement & Assessing Benefit-Risk
   - Improving Enforcement
   - Assessing Benefit-Risk
### FDA Priorities align to HHS Strategic Priorities and other National Activities

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<td>Strengthening public health surveillance</td>
<td>1. Decreasing Exposure &amp; Prevent New Addiction</td>
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<td>3. Fostering the Development of Novel Pain Treatment Therapies</td>
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FDA Work to Address Opioid Crisis

• FDA has taken numerous actions to address opioid use, misuse, and abuse and much work remains
• Actions include safety labeling changes; scientific workshops, public hearings, and advisory committee meetings; approval of abuse-deterrent formulations, medication-assisted treatments, and naloxone products; updating/expanding REMS; and requiring postmarket safety studies
• FDA’s actions regarding opioid risks date back at least 15 years

http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm338566.htm
Responding to Challenges: Opioids and Drug Disposal

- Part of Federal efforts to educate consumers about appropriate disposal of unused and unneeded drugs
- FDA’s drug disposal webpage is consistently among the most viewed webpages on FDA’s website
- FDA updated the disposal webpage on April 23, 2018
  - New graphics
  - New scientific research
- The website received 23,580 unique pageviews during week of April 23, 2018 leading up to DEA’s National Rx Drug Take Back Day on April 28, 2018
Responding to Challenges: Drug Disposal

Drug Disposal Options
Do you have medicine you want to get rid of?

Do you have a drug take-back option readily available?
Check the DEA website as well as your local drugstore and police station for possible options.

NO
Is it on the FDA flush list?

NO
Follow the FDA instructions for disposing of medicine in the household trash.

YES
Immediately flush your medicine in the toilet. Scratch out all personal info on the bottle and recycle or throw it away.

YES
Take your medicine to a drug take-back location.

www.fda.gov/drugdisposal
Responding to Challenges: OTC Product Abuse--Loperamide

• Safe and effective for diarrhea when used as directed
• Populations affected:
  – Crohn’s Disease and Ulcerative Colitis
    • ~1.6 M people
  – Irritable Bowel Disease
    • ~35 M people
  – Traveler’s Diarrhea
• OTC version of loperamide has important role in access to treatment
Loperamide and Cardiac Toxicity

• Emerging signal for abuse of Loperamide
• Supra-therapeutic doses of Loperamide linked to unusual and potentially fatal cardiac arrhythmia (Torsade de pointes)
  – Strong pharmacologic basis for toxicity
  – Difficult to monitor for and detect
• Managing abuse and misuse critical to preserving access for patients
Patterns Similar to Earlier Dextromethorphan (DXT) Abuse

• DXT abused mixed with alcohol
• Calls for DEA scheduling and other federal activities that would limit OTC availability
• Voluntary industry actions were taken that helped address DXT abuse and preserve OTC status
  – Behind the Counter Status
  – Age verification
Addressing Loperamide Abuse: Solutions Must Come From Many Sources

• FDA has important role to play
  • To inform patient and providers
  • To work with industry on solutions

• States are involved as they see abuse and misuse

• Manufacturers and distributors have obligations too:
  • Seek ways to preventing abuse and misuse that also preserve maximum availability for patients
  • Own their role in the distribution of OTC products

• **Goal is to effectively prevent the abuse and misuse while preserving maximum access possible for patients**
FDA Actions to Date

• Safety communications highlighting risk of cardiac toxicity with loperamide abuse
  – https://www.fda.gov/drugs/drugsafety/ucm594232.htm

• Stakeholder engagement
  – Consumer Health Products Association (CHPA)

• Supplement request letters sent to NDA manufacturers requesting unit-dose packaging and package size limitations
  – F/U Discussions with individual retailers

• Ongoing discussions about the appropriate limits for online sales
Responding to Challenges: Expanding Consumer Choice

OTC Monograph Reform, User Fees and NSURE
Background: OTC Monograph System

• Established in 1972 to address hundreds of thousands of OTC products on the market
• Expert Advisory Panels to review safety and efficacy for classes of products
• Rule-making on conditions of use for products (‘GRASE’)
• Enables conforming product marketing without marketing application
Background: OTC Monograph System (cont)

• Process of product review is large and complex
  – 88 rulemakings in 26 broad therapeutic classes
  – 800 active ingredients, 1,400 therapeutic uses
  – Changes also require rulemaking

• Process isn’t complete for all areas
  – Data inadequacies, resource challenges

• Products currently on the market so need to avoid actions that would disrupt availability unnecessarily
OTC Drug Reform Proposal
(Under Consideration by Congress)

Process Weaknesses
- Burdensome, multistep rulemakings
- Limitations on innovation
- Inadequate resources

Current Problems
- Delays in finalizing monographs
- Limited, burdensome process for innovation
- Challenges in responding quickly to urgent safety issues
- Challenges in keeping pace with evolving science and changing market

Industry-Supported Solutions
- Improve process by replacing rulemaking with administrative orders
- Make innovation process more nimble and flexible
- Help speed response to urgent safety issues through interim final orders
- Finalize proposed monographs by statute

Resources for reform supported by User Fees

- OTC Drug Reform Proposal
  Under Consideration by Congress
Nonprescription Drug Safe Use Regulatory Expansion (NSURE) Initiative

• Goal to provide additional regulatory options for innovative OTC development programs
  – Expands which drug products can be considered nonprescription
  – Responsive to larger trends in healthcare towards patient autonomy and self-management

• Enabling Rx to OTC switches critical to OTC space

• FDA support unchanged for guidance and rulemaking
Conclusions
FDA Work on OTC Products:
Responding to Challenges in Healthcare

• Using all of our regulatory tools to respond to trends in US healthcare as well as larger issues confronting public health
• Seeking partnerships wherever possible to accomplish our mission
• Seeking improvements in our process where possible to increase efficiency, transparency and effectiveness
FDA Work on OTC Products: Focus on Benefiting Patients

- Encouraging innovation; opening up new markets; expanding breadth and depth of OTC product lines
- Enhancing self-care to help reduce need for more costly forms of care
- Increasing efficiency, timeliness, and predictability
- Identifying and implementing effective responses to safety concerns to improve safe use of OTC medicines
Thank You