Overview of Postmarketing Drug Safety Reporting Requirements

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Learning Objectives

- Discuss the regulatory foundation of postmarketing drug safety reporting requirements.
- Recognize the importance of submitting accurate, reliable, and timely safety data to FDA.

Medicine in the Wild West

Notable drug laws – the beginning

- 1906: Pure Food and Drug Act
- 1938: Federal Food, Drug and Cosmetic Act of 1938
- 1951: Durham-Humphrey Amendment
- 1962: Kefauver-Harris Drug Amendment

Recent notable drug laws

- 2006: Dietary Supplement and Nonprescription Drug Consumer Protection Act (DSNDCPA)
- 2007: Food and Drug Administration Amendments Act (FDAAA)
- 2012: Food and Drug Administration Safety and Innovation Act (FDASIA)
- 2020: Coronavirus Aid, Relief, and Economic Security Act (CARES Act)

Challenge Question #1

What drug was prescribed to pregnant women in the early 1960s, was found to cause fetal abnormalities, and led to legislation requiring drug manufacturers to prove scientifically that a medication was not only safe but also effective?

A. Dextroamphetamine

B. Diazepam

C. Thalidomide

D. Sulfanilamide

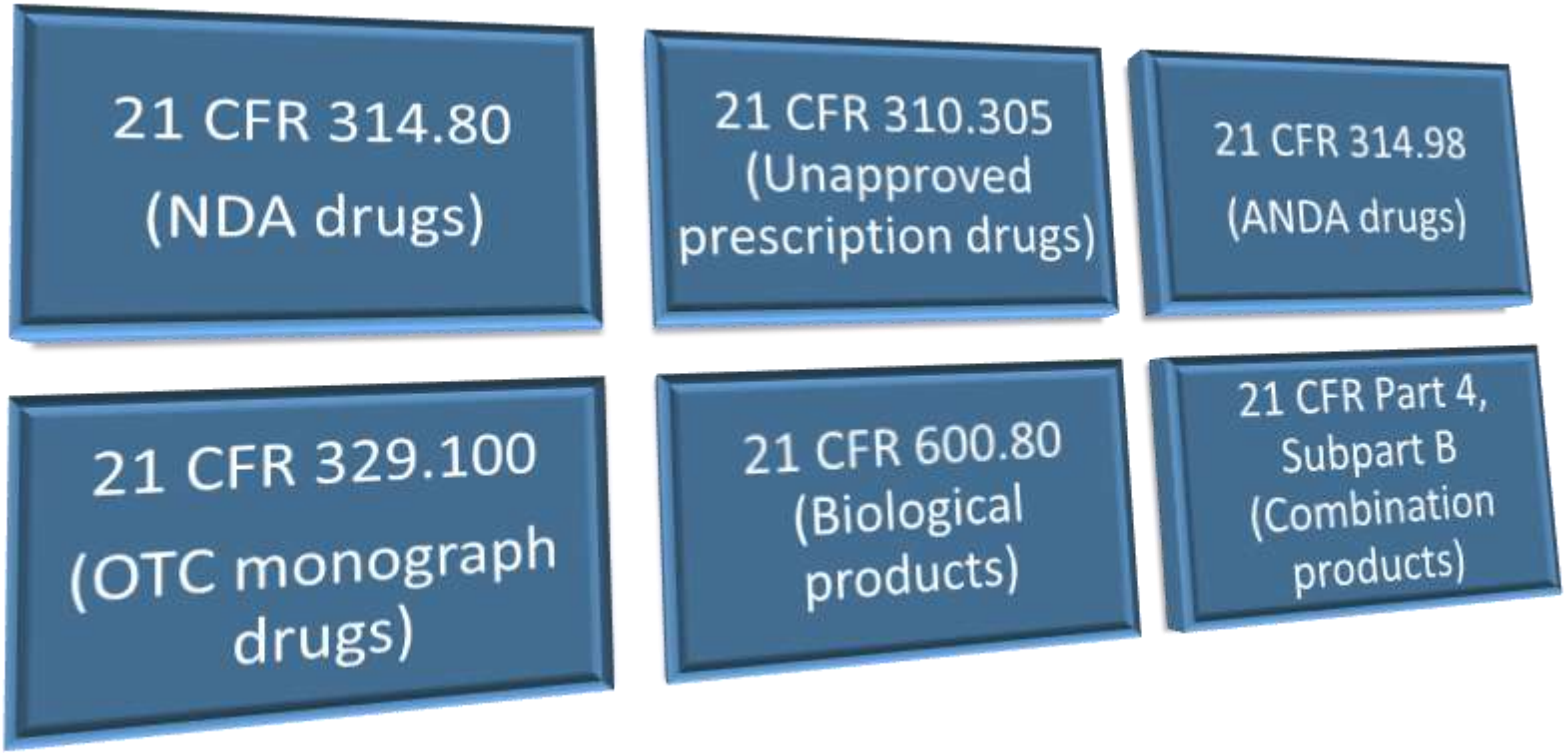
What's the difference?

Statute

Regulation

Guidance

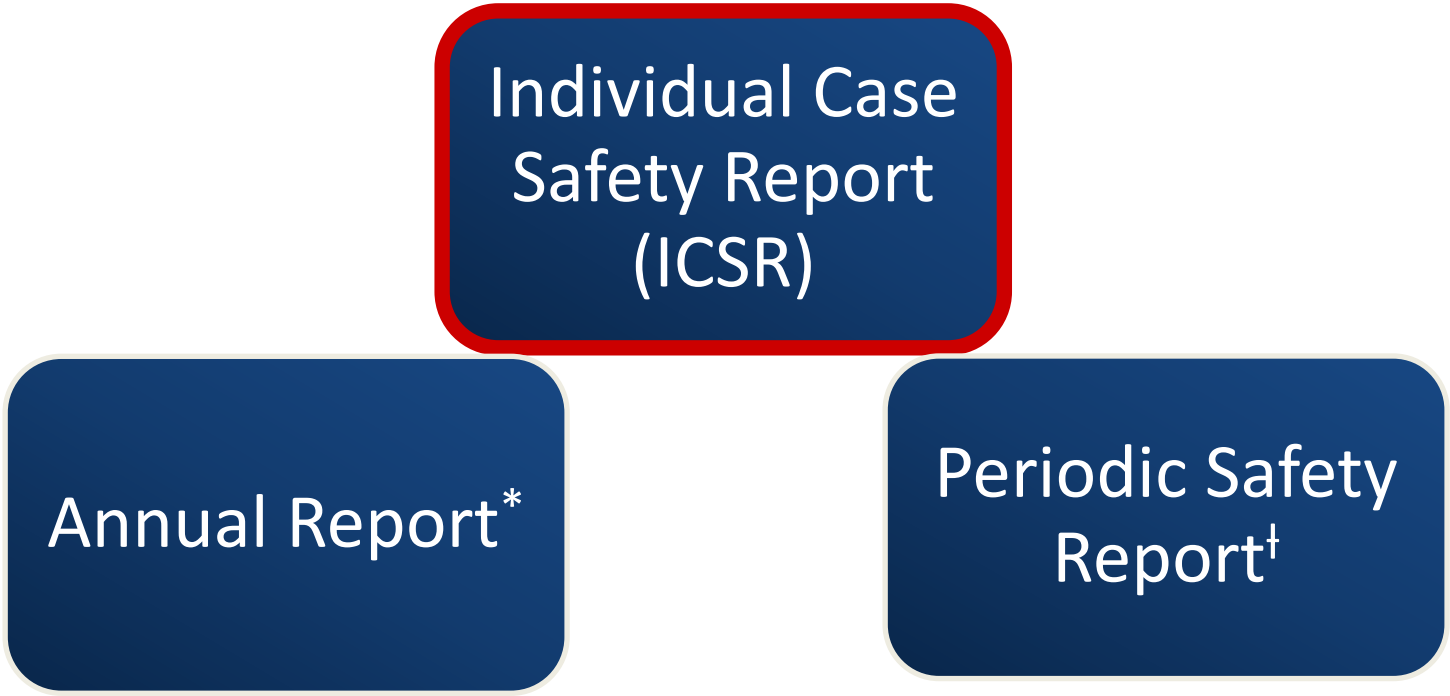
Regulatory Landscape



Guidance for Industry

- Postmarketing Safety Reporting for Human Drug and Biological Products Including Vaccines
- Providing Postmarketing Periodic Safety Reports in the ICH E2C(R2) Format (Periodic Benefit-Risk Evaluation Report)
- Providing Submissions in Electronic Format —Postmarketing Safety Reports
- Postmarketing Safety Reporting for Combination Products
- Postmarketing Adverse Event Reporting for Nonprescription Human Drug Products Marketed Without an Approved Application

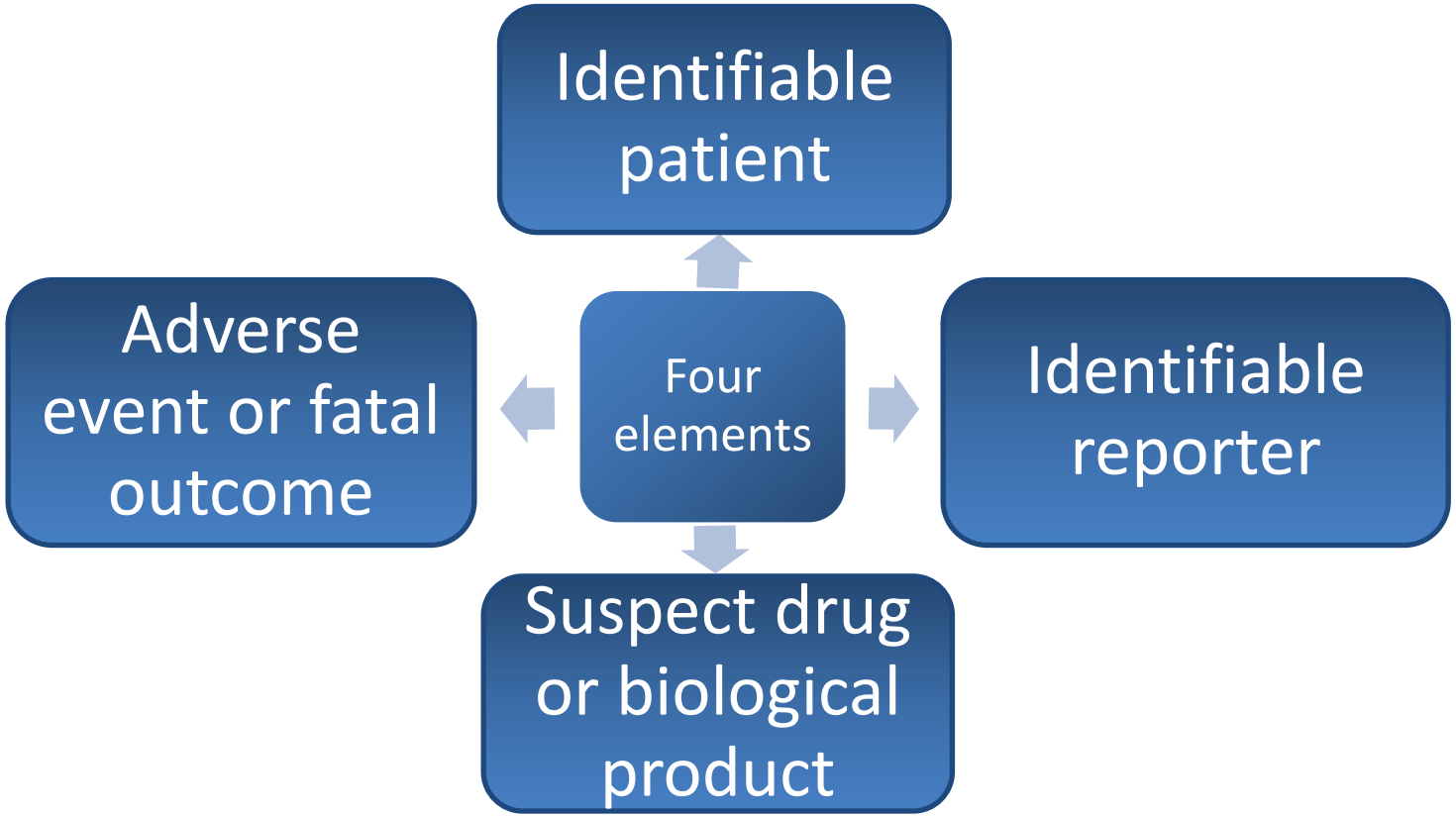
Postmarketing Safety Report Types



* Refer to 21 CFR 314.81

† Periodic Safety Reports include Periodic Adverse Drug Experience Reports (PADERs) and the Periodic Adverse Experience Reports (PAERs). The Periodic Safety Update Report (PSUR) or Periodic Benefit-Risk Evaluation Report (PBRER) format may be submitted with an approved waiver.

At a Minimum…


Identifiable patient
Adverse event or fatal outcome
Four elements
Identifiable reporter
Suspect drug or biological product

Serious Outcomes

- Death
- Life-threatening
- Inpatient hospitalization or prolongation of existing hospitalization
- Persistent or significant disability/incapacity
- Congenital anomaly/birth defect
- Important medical event

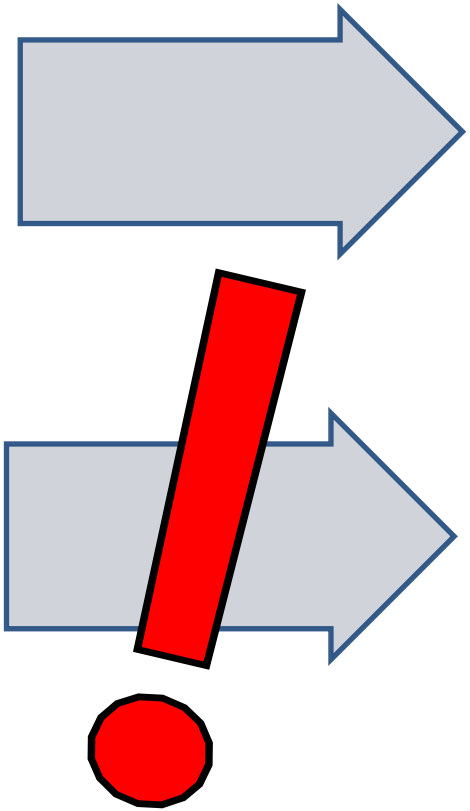
NDAs, BLAs, ANDAs, Unapproved Prescription Drugs

Serious, unexpected

Serious, expected

Non-serious, expected

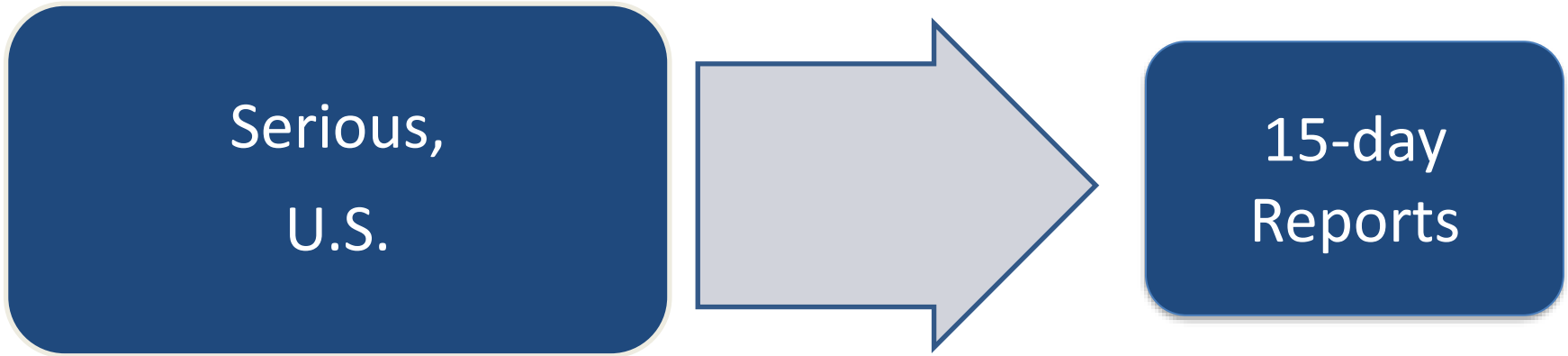
Non-serious unexpected



15-day Alert Reports

Non-expedited ICSRs

21 CFR 329.100 (OTC Monograph drugs)



Electronic Reporting

Submit safety reports in an electronic format

https://www.regulations.gov/document?D=FDA-2008-N-0334-0009

Challenge Question #2

Which of the following outcomes does not meet the regulatory definition of a serious adverse drug experience?

A. Life-threatening

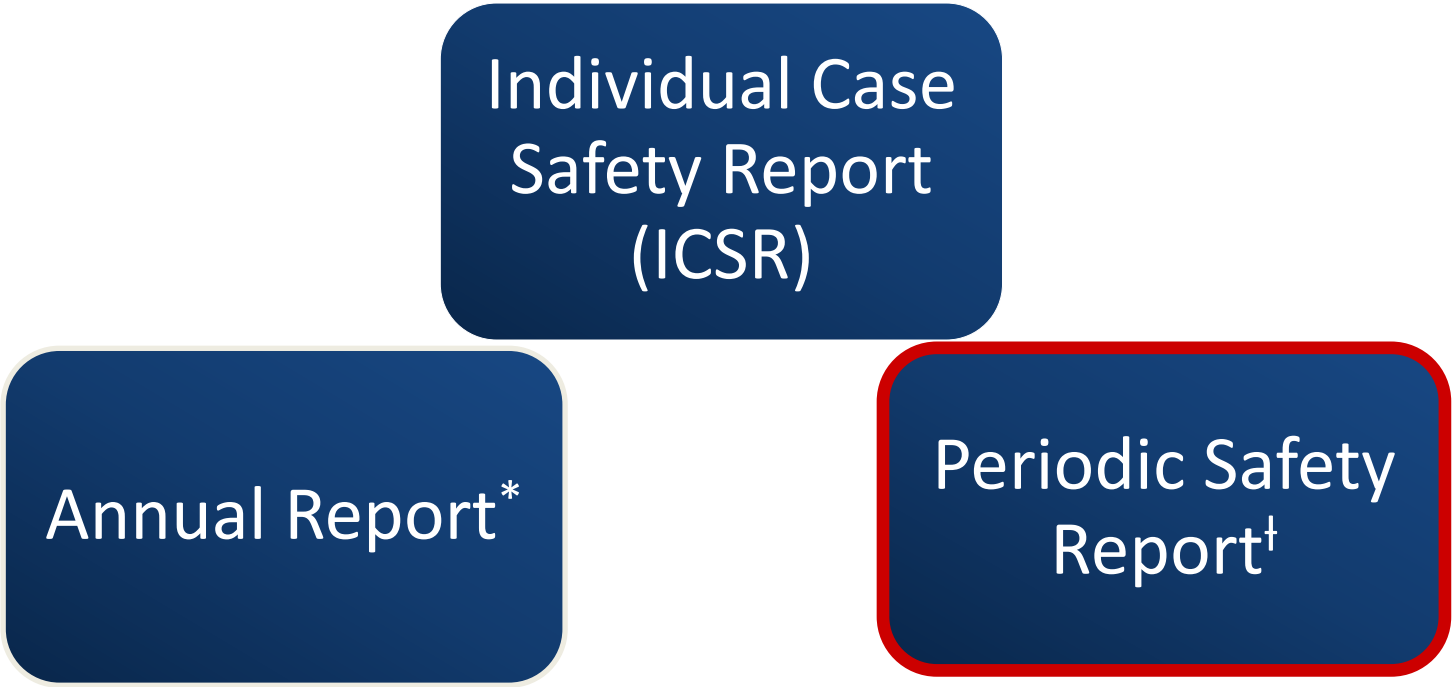
B. Birth defect or congenital anomaly

C. Emergency department visit requiring intensive treatment

D. Death

E. Emergency department visit not requiring intensive medical intervention

Postmarketing Safety Report Types



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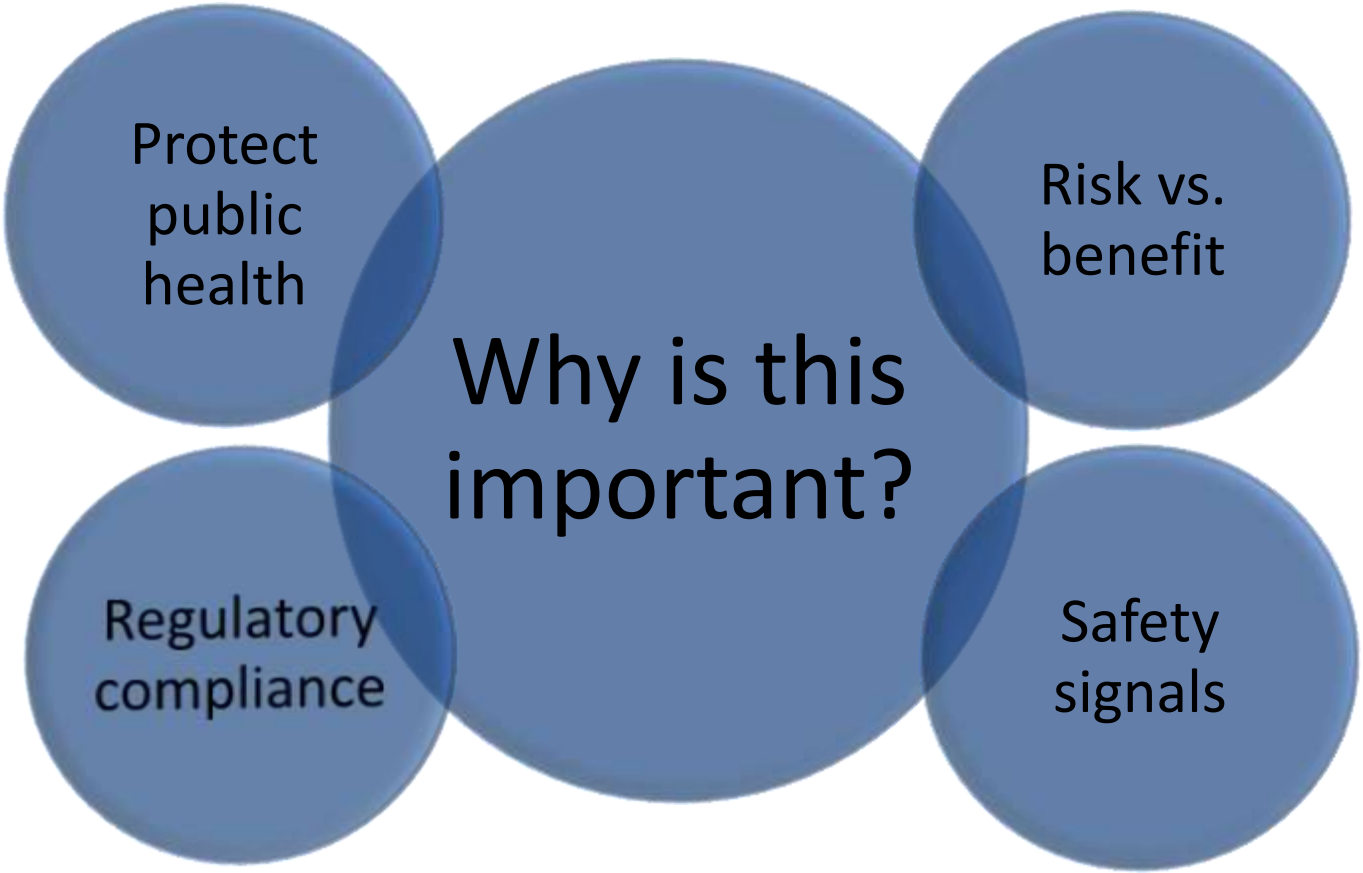
Periodic Safety Reports (PSRs)

Periodic Adverse Drug Experience Report (PADER)	Periodic Adverse Experience Report (PAER)	Periodic Safety Update Report (PSUR)	Periodic Benefit-Risk Evaluation Report (PBRER)
Quarterly reports due within 30 calendar days of DLP*	Quarterly reports due within 30 calendar days of DLP	Intervals of 6 months due within 60 calendar days of DLP	Intervals of 6 or 12 months due within 70 calendar days of DLP
Annual reports due within 60 calendar days of DLP	Annual reports due within 60 calendar days of DLP	Annual reports due within 60 calendar days of DLP	Intervals covering >12 months due within 90 calendar days of DLP

* DLP: data lock point

Resources

- Draft Guidance for Industry: Postmarketing Safety Reporting for Human Drug and Biological Products Including Vaccines (March 2001)
- Draft Guidance for Industry: Providing Submissions in Electronic Format — Postmarketing Safety Reports (draft June 2014)
- Guidance for Industry: Providing Postmarketing Periodic Safety Reports in the ICH E2C(R2) Format (Periodic Benefit-Risk Evaluation Report) (November 2016)
- CFR - Code of Federal Regulations Title 21
- FDA Adverse Event Reporting System (FAERS) Electronic Submissions
- REdI Pharmacovigiliance and Risk Management Conference - New Approaches, Tools, and Technologies (June 9-10, 2020)


Protect public health
Risk vs. benefit
Why is this important?
Regulatory compliance
Safety signals

For more information

Contact the CDER/Office of Surveillance and Epidemiology's Regulatory Affairs Staff at:

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