

FDA Seeking Proposals to Improve Drug Safety

BY ALICIA AULT
Contributing Writer

WASHINGTON — Acknowledging that its drug safety system is inadequate, several Food and Drug Administration officials told an Institute of Medicine panel examining the issue that the agency is ready for recommendations on how to better protect the public's health.

The IOM committee was convened at FDA's request and has been charged with

examining every aspect of the agency's drug safety program, including whether it needs new powers to mandate postmarketing safety studies by pharmaceutical companies.

At its first meeting in June, the panel heard from representatives of the FDA, the pharmaceutical industry, and consumers. Each had had divergent views on how well the system works.

Janet Woodcock, M.D., acting deputy commissioner for FDA operations, said

the agency had come a long way, but that it could improve on predicting, preventing, monitoring, and mitigating adverse drug events. Changes over the past decade have made it more difficult to ensure safety, Dr. Woodcock added.

Before, most drugs were marketed in other countries first, giving the agency a track record to evaluate, she said. Now, the United States is often the first avenue for sales. Huge drug company marketing campaigns aimed at physicians and consumers

have led to a much quicker uptake of new drugs, which brings safety issues to a head even faster. Recalls are happening faster after a drug comes to market, but there has been no big increase in the number of withdrawals, Dr. Woodcock said.

She also said the agency was hamstrung by international agreements on how much premarket safety data could be requested; the agency can't force drug makers to conduct postmarketing safety studies.

MedWatch, FDA's postmarketing surveillance system is full of gaps, Dr. Woodcock added. Pharmaceutical makers are required to report adverse events to MedWatch, but reports from physicians, pharmacists, and other health care providers, and patients are voluntary. MedWatch receives 400,000 reports a year, but the FDA

acknowledges it captures only a fraction of the events.

'Legislative action is essential to address the substantial problems in drug safety and oversight that have been highlighted over the last year.'

Alan Goldhammer, Ph.D., associate vice president of regulatory affairs at the Pharmaceutical Research and Manufacturers of America, said, "simply increasing the

number of spontaneous reports is not the answer" because it might just "increase the noise" instead of providing real signals about side effects.

He said the system was not broken. "We know more about safety profiles of drugs approved today than those approved 20 years ago," Dr. Goldhammer said, adding that "FDA's current legal authorities over drug safety are robust and do not need to be changed."

Bill Vaughan, a senior policy analyst with Consumers Union, vehemently disagreed, saying that the Washington-based nonprofit believes that "legislative action is essential to address the substantial problems in drug safety and oversight that have been highlighted over the last year."

Mr. Vaughan urged the IOM panel to make interim recommendations to Congress as early as this summer, rather than waiting until its final report, due out next year.

"It looks like the industry looks at the FDA like it's a paper tiger, and that needs to be addressed, and addressed soon," Mr. Vaughan said.

Steven Galson, M.D., the acting director for FDA's Center for Drug Evaluation and Research touted the FDA's new Drug Safety Oversight Board, saying it would help provide "independent" oversight and advice. The board's first meeting was in late June.

Sen. Chuck Grassley (R-Iowa), chairman of the Senate Finance Committee, said he was skeptical of the board's capabilities, noting in a letter to FDA acting commissioner Lester Crawford, D.V.M., that it does not seem independent enough.

The next meetings of the panel are scheduled for July 20 and October 25. ■

BONIVA® (ibandronate sodium) TABLETS

BRIEF SUMMARY
CONSULT PACKAGE INSERT FOR FULL PRESCRIBING INFORMATION

CONTRAINDICATIONS

- Known hypersensitivity to BONIVA or to any of its excipients
- Uncorrected hypocalcemia (see **PRECAUTIONS: General**)
- Inability to stand or sit upright for at least 60 minutes (see **DOSE AND ADMINISTRATION**)

WARNINGS

BONIVA, like other bisphosphonates administered orally may cause upper gastrointestinal disorders such as dysphagia, esophagitis, and esophageal or gastric ulcer (see **PRECAUTIONS**).

PRECAUTIONS: General

Mineral Metabolism: Hypocalcemia and other disturbances of bone and mineral metabolism should be effectively treated before starting BONIVA therapy. Adequate intake of calcium and vitamin D is important in all patients.

Upper Gastrointestinal Effects: Bisphosphonates administered orally have been associated with dysphagia, esophagitis, and esophageal or gastric ulcers. This association has been reported for bisphosphonates in postmarketing experience but has not been found in most preapproval clinical trials, including those conducted with BONIVA. Therefore, patients should be advised to pay particular attention to and be able to comply with the dosing instructions to minimize the risk of these effects (see **DOSE AND ADMINISTRATION**).

Severe Renal Impairment: BONIVA is not recommended for use in patients with severe renal impairment (creatinine clearance <30 mL/min).

Jaw Osteonecrosis: Osteonecrosis, primarily in the jaw, has been reported in patients treated with bisphosphonates. Most cases have been in cancer patients undergoing dental procedures, but some have occurred in patients with postmenopausal osteoporosis or other diagnoses. Known risk factors for osteonecrosis include a diagnosis of cancer, concomitant therapies (eg, chemotherapy, radiotherapy, corticosteroids), and co-morbid disorders (eg, anemia, coagulopathy, infection, pre-existing dental disease). Most reported cases have been in patients treated with bisphosphonates intravenously but some have been in patients treated orally. For patients who develop osteonecrosis of the jaw (ONJ) while on bisphosphonate therapy, dental surgery may exacerbate the condition. For patients requiring dental procedures, there are no data available to suggest whether discontinuation of bisphosphonate treatment reduces the risk of ONJ. Clinical judgment of the treating physician should guide the management plan of each patient based on individual benefit/risk assessment.

Musculoskeletal Pain: In postmarketing experience, severe and occasionally incapacitating bone, joint, and/or muscle pain has been reported in patients taking bisphosphonates that are approved for the prevention and treatment of osteoporosis (see **ADVERSE REACTIONS**). However, such reports have been infrequent. This category of drugs include BONIVA (ibandronate sodium) Tablets. Most of the patients were postmenopausal women. The time to onset of symptoms varied from one day to several months after starting the drug. Most patients had relief of symptoms after stopping. A subset had recurrence of symptoms when rechallenged with the same drug or another bisphosphonate. In placebo-controlled studies with BONIVA, the percentages of patients with these symptoms were similar in the BONIVA and placebo groups.

Information for Patients: Patients should be instructed to read the Patient Information Leaflet carefully before taking BONIVA, to re-read it each time the prescription is renewed and to pay particular attention to the dosing instructions in order to maximize absorption and clinical benefit.

-BONIVA should be taken at least 60 minutes before the first food or drink (other than water) of the day and before taking any oral medications containing multivalent cations (including antacids, supplements or vitamins).

-To facilitate delivery to the stomach, and thus reduce the potential for esophageal irritation, BONIVA tablets should be swallowed whole with a full glass of plain water (6 to 8 oz) while the patient is standing or sitting in an upright position. Patients should not lie down for 60 minutes after taking BONIVA.

-Plain water is the only drink that should be taken with BONIVA. Please note that some mineral waters may have a higher concentration of calcium and therefore should not be used.

-Patients should not chew or suck the tablet because of a potential for oropharyngeal ulceration.

-The BONIVA 150-mg tablet should be taken on the same date each month (ie, the patient's BONIVA day).

-If the once-monthly dose is missed, and the patient's next scheduled BONIVA day is more than 7 days away, the patient should be instructed to take one BONIVA 150-mg tablet in the morning following the date that it is remembered (see **DOSE AND ADMINISTRATION**). The patient should then return to taking one BONIVA 150-mg tablet every month in the morning of their chosen day, according to their original schedule.

-The patient must not take two 150-mg tablets within the same week. If the patient's next scheduled BONIVA day is only 1 to 7 days away, the patient must wait until their next scheduled BONIVA day to take their tablet. The patient should then return to taking one BONIVA 150-mg tablet every month in the morning of their chosen day, according to their original schedule.

Patients should receive supplemental calcium and vitamin D if dietary intake is inadequate. Intake of supplemental calcium and vitamin D should be delayed for at least 60 minutes following oral administration of BONIVA in order to maximize absorption of BONIVA.

Physicians should be alert to signs or symptoms signaling a possible esophageal reaction during therapy, and patients should be instructed to discontinue BONIVA and seek medical attention if they develop symptoms of esophageal irritation such as new or worsening dysphagia, pain on swallowing, retrosternal pain, or heartburn.

Drug Interactions

Calcium Supplements/Antacids: Products containing calcium and other multivalent cations (such as aluminum, magnesium, iron) are likely to interfere with absorption of BONIVA. BONIVA should be taken at least 60 minutes before any oral medications containing multivalent cations (including antacids, supplements or vitamins) (see **PRECAUTIONS: Information for Patients**).

H₂ Blockers and Proton Pump Inhibitors (PPIs): Of over 3500 patients enrolled in the BONIVA osteoporosis Treatment and Prevention Studies, 15% used anti-peptic agents (primarily H₂ blockers and PPIs). Among these patients, the incidence of upper gastrointestinal adverse experiences in the patients treated with BONIVA was similar to that in placebo-treated patients. Similarly, of over 1600 patients enrolled in a study comparing once-monthly with daily dosing regimens of ibandronate, 14% of patients used anti-peptic agents. Among these patients, the incidence of upper gastrointestinal adverse experiences in the patients treated with BONIVA 150 mg once monthly was similar to that in patients treated with BONIVA 2.5 mg once daily.

Aspirin/Nonsteroidal Antiinflammatory Drugs (NSAIDs): In the large, placebo-controlled osteoporosis Treatment Study, aspirin and nonsteroidal antiinflammatory drugs were taken by 62% of the 2946 patients. Among aspirin or NSAID users, the incidence of upper gastrointestinal adverse events in patients treated with ibandronate 2.5 mg daily (28.9%) was similar to that in placebo-treated patients (30.7%). Similarly, in the 1-year monthly comparison study, aspirin and nonsteroidal antiinflammatory drugs were taken by 39% of the 1602 patients. The incidence of upper gastrointestinal events in patients concomitantly taking aspirin or NSAIDs was similar in patients taking ibandronate 2.5 mg daily (21.7%) and 150 mg once monthly (22.0%). However, since aspirin, NSAIDs, and bisphosphonates are all associated with gastrointestinal irritation, caution should be exercised in the concomitant use of aspirin or NSAIDs with BONIVA.

Drug/Laboratory Test Interactions: Bisphosphonates are known to interfere with the use of bone-imaging agents. Specific studies with ibandronate have not been performed.

Carcinogenesis, Mutagenesis, Impairment of Fertility: **Carcinogenesis:** In a 104-week carcinogenicity study, doses of 3, 7, or 15 mg/kg/day were administered by oral gavage to male and female Wistar rats (systemic exposures up to 12 and 7

times, respectively, human exposure at the recommended daily oral dose of 2.5 mg, and cumulative exposures up to 3.5 and 2 times, respectively, human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). There were no significant drug-related tumor findings in male or female rats. In a 78-week carcinogenicity study, doses of 5, 20, or 40 mg/kg/day were administered by oral gavage to male and female NMRI mice (exposures up to 475 and 70 times, respectively, human exposure at the recommended daily oral dose of 2.5 mg and cumulative exposures up to 135 and 20 times, respectively, human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). There were no significant drug-related tumor findings in male or female mice. In a 90-week carcinogenicity study, doses of 5, 20, or 80 mg/kg/day were administered in the drinking water to NMRI mice (cumulative monthly exposures in males and females up to 70 and 115 times, respectively, human exposure at the recommended dose of 150 mg, based on AUC comparison). A dose-related increased incidence of adrenal subcapsular adenoma/carcinoma was observed in female mice, which was statistically significant at 80 mg/kg/day (220 to 400 times human exposure at the recommended daily oral dose of 2.5 mg and 115 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). The relevance of these findings to humans is unknown.

Mutagenesis: There was no evidence for a mutagenic or clastogenic potential of ibandronate in the following assays: in vitro bacterial mutagenesis assay in *Salmonella typhimurium* and *Escherichia coli* (Ames test), mammalian cell mutagenesis assay in Chinese hamster V79 cells, and chromosomal aberration test in human peripheral lymphocytes, each with and without metabolic activation. Ibandronate was not genotoxic in the in vivo mouse micronucleus tests for chromosomal damage.

Impairment of Fertility: In female rats treated from 14 days prior to mating through gestation, decreases in fertility, corpora lutea, and implantation sites were observed at an oral dose of 16 mg/kg/day (45 times human exposure at the recommended daily oral dose of 2.5 mg and 13 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison).

Pregnancy: **Pregnancy Category C:** In female rats given oral doses of 1, 4, or 16 mg/kg/day beginning 14 days before mating and continuing through lactation, maternal deaths were observed at the time of delivery in all dose groups (<3 times human exposure at the recommended daily oral dose of 2.5 mg or <1 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). Perinatal pup loss in dams given 16 mg/kg/day (45 times human exposure at the recommended daily oral dose of 2.5 mg and 13 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison) was likely related to maternal dystocia. In pregnant rats given oral doses of 6, 20, or 60 mg/kg/day during gestation, calcium supplementation (32 mg/kg/day) by subcutaneous injection from gestation day 18 to parturition did not completely prevent dystocia and periparturient mortality in any of the treated groups (>16 times human exposure at the recommended daily oral dose of 2.5 mg and >4.6 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). A low incidence of postimplantation loss was observed in rats treated from 14 days before mating through lactation or during gestation, only at doses causing maternal dystocia and periparturient mortality. In pregnant rats dosed orally with 1, 5, or 20 mg/kg/day from gestation day 17 through lactation day 21 (following closure of the hard palate through weaning), maternal toxicity, including dystocia and mortality, fetal perinatal and postnatal mortality, were observed at doses >5 mg/kg/day (equivalent to human exposure at the recommended daily oral dose of 2.5 mg and >4 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). Periparturient mortality has also been observed with other bisphosphonates and appears to be a class effect related to inhibition of skeletal calcium mobilization resulting in hypocalcemia and dystocia. Exposure of pregnant rats during the period of organogenesis resulted in an increased fetal incidence of RPU (renal pelvis ureter) syndrome at oral doses >10 mg/kg/day (>30 times human exposure at the recommended daily oral dose of 2.5 mg and >9 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). Impaired pup neuromuscular development (cliff avoidance test) was observed at 16 mg/kg/day when dams were dosed from 14 days before mating through lactation (45 times human exposure at the recommended daily oral dose of 2.5 mg and 13 times human exposure at the recommended once-monthly oral dose of 150 mg, based on AUC comparison). In pregnant rabbits given oral doses of 1, 4, or 20 mg/kg/day during gestation, dose-related maternal mortality was observed in all treatment groups (<8 times the recommended human daily oral dose of 2.5 mg and <4 times the recommended human once-monthly oral dose of 150 mg, based on body surface area comparison, mg/m²). The deaths occurred prior to parturition and were associated with lung edema and hemorrhage. No significant fetal anomalies were observed. Bisphosphonates are incorporated into the bone matrix, from where they are gradually released over periods of weeks to years. The extent of bisphosphonate incorporation into adult bone, and hence, the amount available for release back into the systemic circulation, is directly related to the total dose and duration of bisphosphonate use. Although there are no data on fetal risk in humans, bisphosphonates do cause fetal harm in animals, and animal data suggest that uptake of bisphosphonates into fetal bone is greater than into maternal bone. Therefore, there is a theoretical risk of fetal harm (eg, skeletal and other abnormalities) if a woman becomes pregnant after completing a course of bisphosphonate therapy. The impact of variables such as time between cessation of bisphosphonate therapy to conception, the particular bisphosphonate used, and the route of administration (intravenous versus oral) on this risk has not been established. There are no adequate and well-controlled studies in pregnant women. BONIVA should be used during pregnancy only if the potential benefit justifies the potential risk to the mother and fetus.

Nursing Mothers: In lactating rats treated with intravenous doses of 0.08 mg/kg, ibandronate was present in breast milk at concentrations of 8.1 to 0.4 ng/mL from 2 to 24 hours after dose administration. Concentrations in milk averaged 1.5 times plasma concentrations. It is not known whether BONIVA is excreted in human milk. Because many drugs are excreted in human milk, caution should be exercised when BONIVA is administered to a nursing woman.

Pediatric Use: Safety and effectiveness in pediatric patients have not been established.

Geriatric Use: Of the patients receiving BONIVA 2.5 mg daily in postmenopausal osteoporosis studies, 62% were over 65 years of age, and 10% were over 75 years of age. Of the patients receiving BONIVA 150 mg once monthly in the postmenopausal osteoporosis 1-year study, 52% were over 65 years of age, and 9% were over 75 years of age. No overall differences in effectiveness or safety were observed between these patients and younger patients but greater sensitivity in some older individuals cannot be ruled out.

ADVERSE REACTIONS

Daily Dosing: Daily treatment with oral BONIVA was studied in over 3900 patients in postmenopausal osteoporosis trials of up to 3 years duration. The overall adverse event profile of BONIVA 2.5 mg once daily in these studies was similar to that of placebo.

Treatment and Prevention of Postmenopausal Osteoporosis: Most adverse events were mild or moderate and did not lead to discontinuation. The incidence of serious adverse events was 20% in the placebo group and 23% in the BONIVA 2.5 mg daily group. Overall, and according to body system, there was no difference between BONIVA and placebo, with adverse events of the digestive system being the most common reason for withdrawal.

Table 1 lists adverse events from the Treatment and Prevention Studies reported in >2% of patients and in more patients treated daily with BONIVA than patients treated with placebo. Adverse events are shown without attribution of causality.

Table 1: Adverse Events Occurring at a Frequency >2% and in More Patients Treated with BONIVA than in Patients Treated with Placebo Daily in the Osteoporosis Treatment and Prevention Studies

| Body System | Placebo % (n=1134) | BONIVA 2.5 mg % (n=1140) |
|---|--------------------------|--------------------------------|
| Body as a Whole | | |
| Back Pain | 12.2 | 13.5 |
| Pain in Extremity | 6.4 | 7.8 |
| Infection | 3.4 | 4.3 |
| Body System | | |
| Headache | 2.3 | 3.5 |
| Allergic Reaction | 1.9 | 2.5 |
| Digestive System | | |
| Dyspepsia | 9.8 | 11.9 |
| Diarrhea | 5.0 | 6.8 |
| Tooth Disorder | 2.3 | 3.5 |
| Vomiting | 2.1 | 2.7 |
| Gastritis | 1.9 | 2.2 |
| Metabolic and Nutritional Disorders | | |
| Hypercholesterolemia | 4.2 | 4.8 |
| Musculoskeletal System | | |
| Myalgia | 5.1 | 5.7 |
| Joint Disorder | 3.3 | 3.6 |
| Arthritis | 2.7 | 3.2 |
| Nervous System | | |
| Headache | 5.8 | 6.5 |
| Dizziness | 2.6 | 3.7 |
| Vertigo | 2.5 | 3.0 |
| Nerve Root Lesion | 1.9 | 2.2 |
| Respiratory System | | |
| Upper Respiratory Infection | 33.2 | 33.7 |
| Bronchitis | 6.8 | 10.0 |
| Pneumonia | 4.3 | 5.9 |
| Pharyngitis | 1.5 | 2.5 |
| Urogenital System | | |
| Urinary Tract Infection | 4.2 | 5.5 |
| Once-Monthly Dosing: In a 1-year, double-blind, multicenter study comparing BONIVA 2.5 mg once daily and BONIVA 150 mg once monthly in women with postmenopausal osteoporosis, the overall safety and tolerability profiles of the two oral dosing regimens were similar. The incidence of serious adverse events was 4.8% in the BONIVA 2.5 mg daily group and 7.1% in the BONIVA 150 mg once-monthly group. The percentage of patients who withdrew from treatment due to adverse events was approximately 8.9% in the BONIVA 2.5 mg daily group and 7.8% in the BONIVA 150 mg once-monthly group. Table 2 lists the adverse events reported in >2% of patients without attribution of causality. | | |

Table 1 cont.

| Body System/Adverse Event | BONIVA 2.5 mg daily % (n=395) | BONIVA 150 mg monthly % (n=396) |
|---|--|--|
| Vascular Disorders | | |
| Hypertension | 7.3 | 6.3 |
| Gastrointestinal Disorders | | |
| Dyspepsia | 7.1 | 5.6 |
| Nausea | 4.8 | 5.1 |
| Diarrhea | 4.1 | 5.1 |
| Constipation | 2.5 | 4.0 |
| Abdominal Pain* | 5.3 | 7.8 |
| Musculoskeletal and Connective Tissue Disorders | | |
| Arthralgia | 3.5 | 5.6 |
| Back Pain | 4.3 | 4.5 |
| Pain in Extremity | 1.3 | 4.0 |
| Localized Osteoarthritis | 1.3 | 3.0 |
| Myalgia | 0.8 | 2.0 |
| Muscle Cramp | 2.0 | 1.8 |
| Infections and Infestations | | |
| Influenza | 3.8 | 4.0 |
| Nasopharyngitis | 4.3 | 3.5 |
| Bronchitis | 3.5 | 2.5 |
| Urinary Tract Infection | 1.8 | 2.3 |
| Upper Respiratory Tract Infection | 2.0 | 2.0 |
| Nervous System Disorders | | |
| Headache | 4.1 | 3.3 |
| Dizziness | 1.0 | 3.3 |
| General Disorders and Administration Site Conditions | | |
| Influenza-like illness* | 0.8 | 2.3 |
| Skin and Subcutaneous Tissue Disorders | | |
| Rash† | 1.3 | 2.3 |
| Psychiatric Disorders | | |
| Insomnia | 0.8 | 2.0 |

*Combination of abdominal pain and abdominal pain upper

†Combination of influenza-like illness and acute phase reaction

‡Combination of rash pruritic, rash macular, rash papular, rash generalized, rash erythematous, dermatitis, dermatitis allergic, dermatitis medicamentosa, erythema and exanthem

§Patients with a previous history of gastrointestinal disease, including patients with peptic ulcer without recent bleeding or hospitalization and patients with dyspepsia or reflux controlled by medication, were included in the once-monthly treatment study. For these patients, there was no difference in upper gastrointestinal adverse events with the 150 mg once-monthly regimen compared to the 2.5 mg once-daily regimen.

¶Ocular Adverse Events: Reports in the medical literature indicate that bisphosphonates may be associated with ocular inflammation such as uveitis and scleritis. In some cases, these events did not resolve until the bisphosphonate was discontinued. There were no reports of ocular inflammation in studies with BONIVA 2.5 mg daily. Two patients who received BONIVA once monthly experienced ocular inflammation, one was a case of uveitis and the other scleritis.

‡Laboratory Test Findings: In the 3-year treatment study with BONIVA 2.5 mg daily, there were no clinically significant changes from baseline values or shifts in any laboratory variable for each of the treatment groups. As expected with bisphosphonate treatment, a decrease in total alkaline phosphatase levels was seen in the active treatment groups compared to placebo. There was no difference compared with placebo for laboratory abnormalities indicative of hepatic or renal dysfunction, hypocalcemia, or hypophosphatemia. Similarly, no changes were noted for the 150 mg once-monthly administration in the 1-year study.

§OVERDOSAGE: No specific information is available on the treatment of overdose with BONIVA. However, based on knowledge of this class of compounds, oral overdose may result in hypocalcemia, hypophosphatemia, and upper gastrointestinal adverse events, such as upset stomach, dyspepsia, esophagitis, gastritis, or ulcer. Milk or antacids should be given to bind BONIVA. Due to the risk of esophageal irritation, vomiting should not be induced, and the patient should remain fully upright. Dialysis would not be beneficial.

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