

To: CN=Charles M Beasley Jr/OU=AM/O=LLY@Lilly; CN=Paul Berg/OU=AM/O=LLY@Lilly; CN=Mark J Bernauer/OU=AM/O=LLY@Lilly; CN=Julie Birt/OU=AM/O=LLY@Lilly; CN=William P Brookfield/OU=AM/O=LLY@Lilly; CN=Anthony M Fiola/OU=AM/O=LLY@Lilly; CN=Kristine Healey/OU=AM/O=LLY@Lilly; CN=Kenneth Hornbuckle/OU=AM/O=LLY@Lilly; CN=Jared G Kerr/OU=AM/O=LLY@Lilly; CN=Kenneth C Kwong/OU=AM/O=LLY@Lilly; CN=Mark D Millikan/OU=AM/O=LLY@Lilly; CN=Jeffrey T Ramsey/OU=AM/O=LLY@Lilly; CN=H John Roth/OU=AM/O=LLY@Lilly; CN=Michele Sharp/OU=AM/O=LLY@Lilly
CC: CN=Starr Grundy/OU=AM/O=LLY@Lilly; CN=Anna Thornton/OU=AM/O=LLY@Lilly
Date: 06/04/2001 02:30:29 PM
From: CN=Anna Thornton/OU=AM/O=LLY
Subject: Summary from FDA symposium: Evaluating a Safety Signal in the Postmarketing Period: Hyperglycemia and the Atypical Antipsychotic Drugs

FYI (please delete if you have already received!) --

Information regarding a presentation made at NCDEU last Thursday.

Thanks Starr for the summary!!

Anna
(x77076)

Bryan Johnstone

05/31/2001 05:53 PM

To: Alan Breier/AM/LLY@Lilly, Robert A Browne/AM/LLY@Lilly, Suzanne F Clifford/AM/LLY@Lilly, James B Gregory/AM/LLY@Lilly, Jack E Jordan/AM/LLY@Lilly, Marni Lemons/AM/LLY@Lilly, John R Richards/AM/LLY@Lilly, Virginia Stauffer/AM/LLY@Lilly, Robert K Thompson/AM/LLY@Lilly, Mauricio F Tohen/AM/LLY@Lilly, Vincent P Truax III/AM/LLY@Lilly, Paula T Trzepacz/AM/LLY@Lilly, US_NS_MD, Jill R Welch/AM/LLY@Lilly, Dennis G West/AM/LLY@Lilly, Frederic Wieler/AM/LLY@Lilly
cc: Starr Grundy/AM/LLY@Lilly
Subject: Summary from FDA symposium: Evaluating a Safety Signal in the Postmarketing Period: Hyperglycemia and the Atypical Antipsychotic Drugs

Fyi,

Page: 1 of 5

Summary of today's FDA presentation at the NCDEU meeting on the atypical antipsychotics and hyperglycemia. Thanks to Starr Grundy for providing this information.

Bryan

----- Forwarded by Bryan Johnstone/AM/LLY on 05/31/01 04:50 PM -----

Starr Grundy

05/31/01 04:37 PM

To: US_Neuro_ML
cc: Robert W Baker@Lilly, Patrizia Cavazzoni@Lilly
Subject: Summary from FDA symposium: Evaluating a Safety Signal in the Postmarketing Period: Hyperglycemia and the Atypical Antipsychotic Drugs

Dear All,

I have typed up the notes that I took this morning from this symposium. If you attended, please feel free to add additional comments that I have missed.

Best regards,
Starr

Thursday, May 31, 2001

10:00-10:30

Evaluating a Safety Signal in the Postmarketing Period: Hyperglycemia and the Atypical Antipsychotic Drugs

Judith Racoosin, M.D., MPH; FDA

Steps in evaluation process

- identification of safety concern
- evaluation
- collection of additional data
- further epidemiological study
- risk-management options

How are safety concerns identified?

- case reports
- adverse events reported through Medwatch
- sponsor identifies issue when reviewing reported adverse events

Page: 2 of 5

Examples of Case Reports that have been further evaluated by the FDA:

1. Clozapine and Myocarditis
2. SSRI's and GI bleeding
3. Atypical Antipsychotics and reports of hyperglycemia, diabetes mellitus

Review of Reports to the Adverse Event reporting system

- Safety evaluators focus on serious, unlabeled events
- When a serious or concerning reports accumulates, the safety evaluators compile a case series.

Calculation of Reporting Rates

- Usage data is obtained
 - OPDRA contracts with IMS
 - National Disease & Therapeutics Index provides statistical information on the patterns of the treatments of diseases
 - person years = # prescriptions/12 (assumes one prescription = 30 days)
 - reporting rate = # of cases/person years

Caveats for Interpreting Reporting Rates

- reporting rate does not equal incidence rate due to a substantial amount of underreporting (numerator) and potential inaccuracy of exposure estimate (denominator)
- reporting is not consistent from year to year or from event to event
 - duration product is on the market (greatest in first 3 years post launch)
 - serious or unexpected events are reported until they become part of the clinical culture (e.g., rash with lamotrigine)
- need to consider increase in overall frequency of reporting (cannot compare old reporting with the "typical" antipsychotics with current reporting with the "atypical" antipsychotics).

Reporting Rates

- compare reporting rate to the background rate of the event in the population
- done by looking at epidemiological studies, literature, vital statistics, National Hospital Discharge survey
- concern arises if it meets or exceeds background rate (especially because of the problem of underreporting).

Factors to consider when reviewing cases

- background incidence in population (disease; e.g., diabetes in schizophrenia being reported before the introduction of antipsychotics)
- are risk factors known
- can the condition be asymptomatic and then discovered at a change of treatment

Reporting Rates 1999

	Clozapine	Risperidone	Olanzapine	Quetiapine
Year marketed	1991	1994	1996	1997
Total US patients	11.4	14.9	8	1.1
Reporting period	1/93-9/99	1/94-6/99	1/96-8/99	1/97-1/99
	n/Rate	n/Rate	n/Rate	n/Rate
New-onset DM (NODM)	90/18	55/4.5	81/12	1/1.1
NODM, with DKA	27/5.4	10/0.8	37/5.6	1/1.1
NODM, with NHHS	6/1.2	4/0.3	5/0.5	0/0.0

Dr. Racoosin mentioned that there appeared to be a difference in the rate reported with clozapine and olanzapine in this sample compared with risperidone and quetiapine.

Once a safety signal is generated, it can be useful to return to the NDA
-similar adverse events?

She reviewed the data collected from Study 054

-noted that there was a difference between olanzapine and others
-however, she did note that there didn't appear to be a difference for Outliers in any of the treatment groups for fasting glucose and insulin(from Study 054).

Further Epidemiological Study

-study of adverse events is not usually amenable to a randomized double-blind, controlled trial.
-two options for observational studies
-Sponsor Supported
-FDA cooperative agreements
-OPDRA administers an extramural research program that addresses regulatory safety questions

Risk Management Options

-labelling changes
-ranges from inclusion in "post-introduction section" to addition of "Black Box"
-Patient package insert
-Medication guidance
-Restricted distribution
-Withdrawal

During the Q & A session someone in the audience asked the question: Where is the FDA headed with atypicals and diabetes?

The FDA is in the process of gathering additional data:

Have already

Spontaneous report review

NDA review

Sponsor epidemiologic submissions

Considering starting their own trials

-possibly adding onto the CATIE trials in schizophrenia

-glucose

-glycosylated hemoglobin

Currently, only clozapine has language in its labelling and they are discussing other products; no decisions have been made.