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INTRODUCTION TO PHARMACOVIGILANCE CONCEPTS AND GENERAL FRAMEWORK

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Pharmacovigilance (Drug Safety)

- Pharmakon (=drug) and vigilare (=keep watch).
- *Discipline* and activities relating to the **detection, assessment, understanding and prevention & management of adverse effects** or any other drug-related problem



(WHO, 2002)

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Pharmacovigilance. Aims

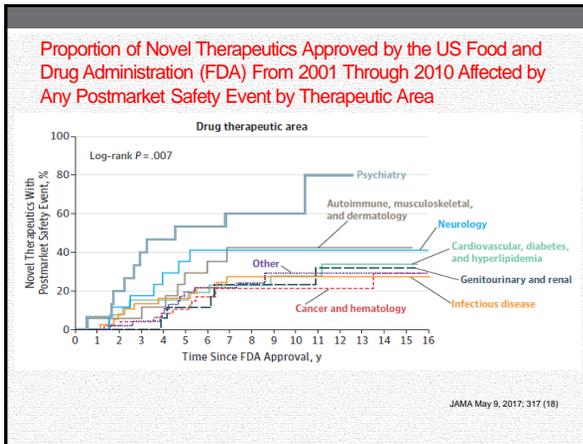
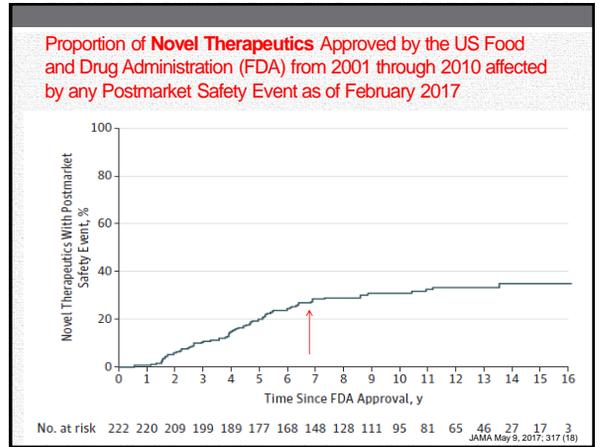
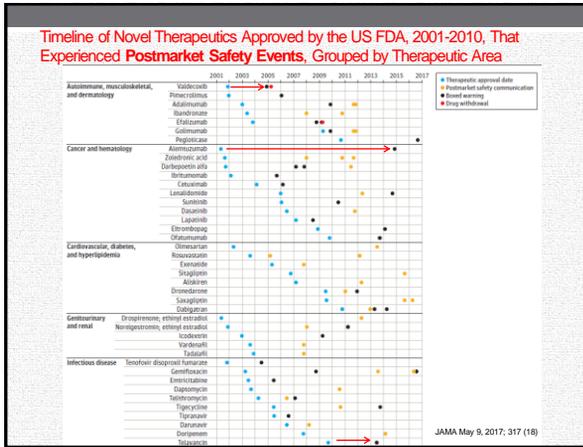
- **Early detection** of unknown safety problems
- Identification of **risk factors**
- **Quantification** of risks
- **Preventing** patients from being affected unnecessarily

Rational and Safe Use of Medicines, WHO

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Why is Pharmacovigilance Important?

- Adverse Drug Reactions are among the top ten causes of mortality (Lazarou J. et al., 1998)
- The percentage of hospital admissions due to drug related events in some countries is about or more than 10% (Bhalla et al. 2003; Imbs et al. 1999)
- Drug related morbidity and mortality expenses exceeded US\$ 177.4 billion in the USA in 2000 (Ernst & Grizzle, 2001)



Phases of Drug Development

	PHASE I	PHASE II	PHASE III	PHASE IV
STUDIES IN VITRO AND IN VIVO	Who? Healthy volunteers, small number Why? Safety, biological effects, pharmacokinetics profile, dosage range, duration of action and drug interactions By Whom? Clinical Pharmacologists	Who? Selected patients (up to 300 patients) Why? Therapeutic efficacy, dose range, kinetics, metabolism By Whom? Clinical pharmacologists, clinical investigators	Who? Large sample of selected patients (500-3000 patients) Why? Safety and efficacy By Whom? Clinical pharmacologists, clinical investigators and pharmacoepidemiologists	Who? Patients given drug for therapy Why? Adverse reactions-labeling changes, patterns of drug utilization, additional indications discovered, pricing negotiations, marketing By Whom? Pharmacoepidemiologists and all physicians
ANIMAL TESTING				
•SHORT TERM				
•LONG TERM				
Questions answered in this phase				
• Is the substance biologically active?				
• Is it safe?				
1-5 years (μ=2.6 yr)	2-10 years (μ=5.6 yr)	Variable		
<i>Preclinical</i>	<i>Clinical</i>	<i>Postmarketing Surveillance</i>		
Kaplan KL, et al. J Clin Pharmacol 1987;27:542-548; Young FE, et al. JAMA 1988; 259:2267-2270				

Preclinical	Phase 1	Phase 2	Phase 3	A P P R O V A L	Postmarketing
Safety & Biological Activity	Safety & Dosage	Safety & Efficacy	Safety & Efficacy		Safety Surveillance
SAFETY CONCERNS					

Limitations of Clinical Trials

- Trial population
 - Size (small ~ 3,000 subjects)
 - Representativeness of trial population vs. real world population
 - Trial population vs. real world or treated population (CT: narrowly defined study population: age groups, comorbidities, concomitant medications)
- Indications for use
 - Proposed indication for use
 - Patients at complex disease stages often not enrolled
- Duration of trial
 - Typical chronic use (years) vs. trial (several weeks to months)
- Frequency of ADRs
 - Uncommon ADRs are difficult to detect

FDA, 2018; Ann Intern Med. 2010;153:600-606.

Sample Size

Statistical Power

Frequency (AE)	95%	90%	80%	63%
1/100	300	231	161	100
1/500	1500	1152	805	500
1/1000	3000	2303	1,610	1000
1/5000	15,000	11,513	8,048	5000
1/10,000	30,000	23,026	16,095	10,000
1/50,000	150,000	115,130	80,472	50,000

Probability of detecting an unintended drug effect if it really occurs in the population under study.

Sackett DL, 1986. In: Inman WHW. Monitoring for drug safety 1986: 471-483.

page 12

Ideally, a medication should be prescribed to:

- The **right patient**,
- With the **right disease**,
- With the **right medication**,
- In the **proper dosage and intervals**,
- And for the **appropriate length of time**

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Pharmacovigilance & Drug Utilization

- It is not always the product that determines drug safety but **how it is used**
- There is a high risk of misuse of drugs
 - Disease
 - Population
 - Drug
 - Health care system
- More than 50% of ADRs are preventable

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Public Health Programs and Pharmacovigilance

- Incidence and prevalence of the disease
- Morbidity and mortality rates
- Number of patients treated
- Number of drug units delivered

What about **the risk / effectiveness** of drugs used?

IMPORTANT DEFINITIONS IN PHARMACOVIGILANCE

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Side Effects

- Any **unintended outcome (negative or positive effects)** that seems to be associated with treatment.
- This term is often used in **patient information** and other contexts.
- Unintended effect occurring at normal dose related to the pharmacological properties?

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Adverse Effect

A **negative or harmful patient outcome** that **seems to be associated with treatment**, including there being no effect at all



<https://www.who-umc.org/safer-use-of-medicines/safer-use-of-medicines-the-basics/common-concepts-and-terms/>

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Adverse Event

- Any **unfavorable and unintended sign** (including an abnormal laboratory finding, for example), **symptom, or disease temporally associated with the use of a medicinal product, but not necessarily causally related**
- Unexpected medical occurrence in a subject or clinical investigation subject administered a pharmaceutical product and where **not necessarily have a causal relationship with the treatment.**

ICH E2A Guideline: "Clinical Data Management: Definition and the Standards for Expedited Reporting", FDA guidance.

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Adverse Event

Severity (Intensity)	Seriousness	Expectedness	Listedness	Causality
<ul style="list-style-type: none"> Mild Moderate Severe 	<ul style="list-style-type: none"> Serious Non-serious 	<ul style="list-style-type: none"> Expected Unexpected 	<ul style="list-style-type: none"> Listed No listed 	<ul style="list-style-type: none"> Related No related (unrelated)
		Reference Safety Information of IB (Development), Label (Marketed)	Label	

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Adverse Drug Reaction (ADR)

- A harmful effect suspected to be **caused by a drug**
- A response to a drug which is **noxious and unintended**, and which occurs at **doses normally used in man** for the prophylaxis, diagnosis, or therapy of disease, or for the modifications of physiological function (WHO, 1972)

Standard Categories of Frequency	
Very common	≥ 1/10 [≥ 10%]
Common	≥ 1/100 to < 1/10 [≥ 1% and < 10%]
Uncommon	≥ 1/1000 to < 1/100 [≥ 0.1% and < 1%]
Rare	≥ 1/10,000 to < 1/1000 [≥ 0.01% and < 0.1%]
Very rare	< 1/10,000 [$<$ 0.01%]
Frequency not known*	Cannot be estimated from the available data

* Summary of Product Characteristics (SmPC)/QRD guidelines recommends language "Not known". CDS recommends language "Frequency not known".

CDMS (ITV) Conventio and the European Commission document "A Guideline on Summary of Product Characteristics" dated September 2009. <https://www.who-umc.org/safer-use-of-medicines/safer-use-of-medicines-the-basics/common-concepts-and-terms/>

Are ADRs the Same within a Therapeutic Class?

- Variation in terms of:
 - Severity
 - Likelihood of occurrence
 - Effect on individual patients
 - Public health impact



Example

1. Pathway for cholesterol formation

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    Acetyl-CoA → HMG-CoA → Mevalonic acid → series of reactions → CHOLESTEROL
    
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2. Mechanism to reduce cholesterol through action of STATINS

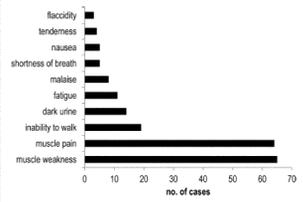
STATINS → CYP-3A4 → STATINS oxidized → STATINS oxidized and glucuronidated → excretion of STATINS

3. Interference of other drugs in metabolism of statins

- Antifungals (n = 7)
- Macrolides (n = 8)
- Fuasic Acid (n = 6)
- Cyclosporine (n = 4)
- Protease inhibitors (n = 4)
- Calcium channel blocker (n = 2)
- Fibrates (n = 24)

Physiotherapy Canada 2014; 66(2):124-132

Key Characteristics of Fatal Cases of Statin-Induced Rhabdomyolysis (n=17)



Characteristic	No. of cases
Age, y	
<45	2
46-65	5
66-75	7
>75	3
Sex	
Male	15
Female	2
Pre-existing conditions	
Cardiovascular disease	13
Diabetes mellitus	10
Renal impairment	7
Hypertension	5
Time to onset, d	
<7	5
8-14	4
>15	2
Not reported	6
Type of statin	
Simvastatin	6
Atorvastatin	6
Low-dose statin	3
Carvastatin	1
Fluvastatin	1
Statin dose, mg	
≤20	5
21-39	3
≥40	4
Not reported	5
Concomitant drugs	
Antibiotics	6
Fibrates	2
Antifungals	1
Other	4
None	4

Physiotherapy Canada 2014; 66(2):124-132

Serious Adverse Experience, Event or Reaction

- Results in any of these outcomes:
 - Death**
 - Life-threatening** adverse experience
 - Inpatient **hospitalization** –new or prolonged
 - Persistent/significant **disability/incapacity**
 - Congenital birth defect**
 - Other serious: based upon appropriate **medical judgment**, they may jeopardize the patient and require intervention to prevent a serious outcome

Note: Seriousness is different to **severity**, which refers to the **intensity** of the event (e.g. severe headache)

Federal Register-Code of Federal Regulations, 21 CFR 314.80 (a), FDA 2018

Unexpected Adverse Reaction

- Not consistent with applicable product information or characteristics of drug



Exercise

- Relate each case with each definition using the list distributed during the session

Cases	Relate w/correct answer
1) Female patient who experienced increased of hepatic enzymes after one week on an antifungal medication	a) Adverse event
2) This is a 35 year-old male, soccer player, who complained of myalgias and was on antihypertensive drugs and lipid lowering medications	b) Expected adverse drug reaction
3) This is a 49 year-old female patient exposed to insulin who experienced headache, dizziness and syncope and recovered after drinking a glass of orange juice	c) Adverse drug reaction

Benefit, Benefit/Risk

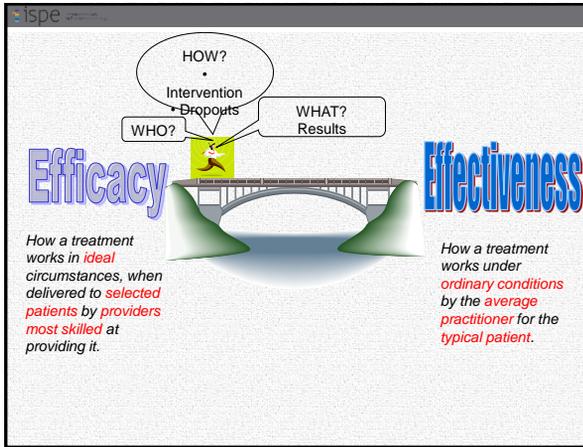
- Benefit:**
 - Positive therapeutic effects of treatment in an individual
 - Positive health, social or psychological effects of treatment from the patient's perspective.
- Benefit-risk:** Description of both positive and negative effects of a medicine and the likelihood of their occurrence, as far as they are known, as perceived by an individual.
 - B/R represents a critical information that health professionals and patients need to make wise therapeutic decisions. The perspectives of professionals and patients on the issues may differ.

<https://www.who.int/medicines/better-use-of-medicines/better-use-of-medicines-the-basics/common-concepts-and-terms/>

Effectiveness, Effectiveness/Risk, Efficacy

- Effectiveness:** A measure of the chances or odds (probability) of a medicine working positively as expected for patients.
 - Measure of the effect of a drug in the "real world"
- Effectiveness-risk:** A comparison of the statistical chances (probability) of a medicine working as expected and/or causing harm.
- Efficacy:** A measure of the extent to which a chemical substance or medicine works positively under laboratory conditions and in a selected group of patients.

<https://www.who.int/medicines/better-use-of-medicines/better-use-of-medicines-the-basics/common-concepts-and-terms/>



Efficacy: Randomized Controlled Clinical Trials

- Rigorous inclusion and exclusion criteria:
 - Limited to certain study population
 - Limited to a spectrum of a disease
 - Limited to certain number of comorbid conditions
 - Limited to certain number of medications

INTERNAL VALIDITY

Effectiveness

- Heterogeneous group of patients:
 - Age
 - Gender
 - SES
- Co-morbid conditions
- Multiple treatments (pharmacologic and non pharmacologic treatments)
- Variation of patient adherence to treatment
- Variation of medical practice and compliance to guidelines
- Variation of medical knowledge among patients
- Access to care (HCS), type of care
- Costs

EXTERNAL VALIDITY

Harm, Hazard and Risk

- **Harm:** The damage, injury or impairment that is or might be caused by a medicine, including death.
- **Hazard:** The intrinsic chemical or biological characteristics of a medicine or its use that have the potential to cause harm.
- **Risk:** The statistical probability of harm being caused.

Doxorubicin → Cardiotoxicity → Cardioversion

<https://www.williams-walkers.com/safer-use-of-medicines/safer-use-of-medicines-the-basics/safer-use-of-medicines-the-basics-common-concepts-and-terms/>

Pharmacovigilance Reporting Systems (Postmarketing/Safety Surveillance, Spontaneous Reporting Systems)

The core **data-generating system** of pharmacovigilance, relying on healthcare professionals and patients to **identify and report any suspected adverse effects from medicines to their local or national pharmacovigilance center or to the manufacturer.**

<https://www.who-umc.org/safer-use-of-medicines/safer-use-of-medicines-the-basics/common-concepts-and-terms/>

Reporting to MedWatch

Patient Identifier

Event or Problem

Reporter

Product

YellowCard
Helping to make medicines safer

A side effect of your medicine? Report it using Yellow Card

If you think the medicine you are taking may have caused a side effect, you can report it using Yellow Card.

Electronic Reporting **MHRA**

YellowCard
Helping to make medicines safer

Yellow Card Report

Welcome back. If you would like to fill in a new Yellow Card please click on the button below. You can also update a Yellow Card report you have previously saved by clicking on one. To edit your details, please change them below and click "save data".

Current Yellow Cards

Yellow Card Number	Reference	Last Update	Date	YCR
There are no currently unreported yellow cards associated with your account.				

Further Information

Downloadable Information

Contact Us

Log out

Fields marked with a * are required

First Name * [Text Field]

Last Name * [Text Field]

Profession * [Dropdown: Other healthcare professional]

Hospital / Practice Name * [Text Field]

Postal Address * [Text Field]

Postcode * [Text Field]

Landline Telephone * [Text Field]

Mobile Telephone * [Text Field]

House Number or Name * [Text Field]

Address * [Text Field]

Address Line 2 * [Text Field]

Address Line 3 * [Text Field]

Town * [Text Field]

County * [Text Field]

Postcode * [Text Field]

Telephone number * [Text Field]

I have read and understood the data protection and confidentiality statements.

Save Details



Benefits of Spontaneous Reporting Systems

- Key in monitoring patient safety
- Particularly useful for new medications where clinical trials:
 - Exposed small numbers of people
 - Short duration
 - Unlikely to detect ADRs particularly those with frequency of <1/1500 or long latency
- Lack of experience in special patient groups such as pediatric population, elderly, pregnancy
- Important for chronic and long term use
- To detect drug-drug interactions, drug-food interactions

Severe Cutaneous Adverse Reactions (SCAR) in Oncology

Drug class	Drug	Pharmacology	References	Total (n)	Mortality	SIS	SR/TEN	TEN
Alkylating agents	Treosulfam	Alkylsulfonates	[6]	1	1	0	0	1
	Chlorambucil	Mustard gas derivatives	[7, 8]	2	0	0	0	2
	Mechlorethamine (topical)	Nitrogen mustard	[9]	1	0	1	0	0
Plant alkaloids	Temozolomide	Hydrazines and triazines	[10]	1	0	0	1	0
	Procarbazine	Hydrazines and triazines	[11-13]	3	0	0	0	3
Antitumor antibiotics	Paclitaxel	Taxanes	[14]	1	0	1	0	0
	Docetaxel	Taxanes	[15-19]	5	2	3	0	2
	Etoposide	Podophylotoxins	[20]	1	0	1	0	0
Antimetabolites	Doxorubicin		[21]	1	1	0	0	1
	Methotrexate	Folic acid antagonists	[22-26]	5	2	2	0	3
	Cytarabine	Pyrimidine antagonist	[27, 28]	2	2	0	0	2
	Fludarabine	Adenosine deaminase inhibitor	[29]	1	1	1	0	0
	Gemcitabine	Pyrimidine antagonist	[30-32]	3	0	2	1	0
Miscellaneous	Capecitabine	Pyrimidine antagonist	[33]	1	0	1	0	0
	Cladribine	Purine antagonist	[34, 35]	2	NA	1	0	1
	6-Mercaptopurine	Purine antagonist	[36]	1	NA	0	0	1
	TS-1 (tegafur-gimeracil-oteracil potassium)		[37, 38]	2	0	1	0	1
Antitumor antibiotics	Penicreted	Multitarget antifolate	[39, 40]	2	0	0	0	2
	Bleomycin		[41, 42]	2	1	0	0	2
	Peplomycin		[43]	1	0	1	0	0
Miscellaneous	Mithramycin		[44, 45]	2	0	0	0	2
	Lenalidomide		[46-48]	14	2	12	1	1
Miscellaneous	Thalidomide		[49-53]	5	1	1	0	4
	Asparaginase		[54]	1	0	0	0	1
				Total	60	13	28	3

NA: not available. Journal of Immunology Research 2018; 1-9

Individual Case Safety Reports (ICSR)

- Reports sent by health professionals or patients when an adverse effect has occurred in a patient taking one or more medicines.

- 49-year old female patient
- Diagnosis: Bipolar Disorder
- Treatment: Antipsychotic medication started one year before the reported adverse events
- After stopping therapy, she developed "dizziness, can hardly walk and feet are going numb"
- Concomitant therapy: not provided
- Outcome: unknown

<https://www.who-umc.org/safer-use-of-medicines/safer-use-of-medicines-the-basics/common-concepts-and-terms/>, Accessed May 2018

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Four Requirements for a Valid Case Report

- ✓ Patient
- ✓ Drug product
- ✓ Adverse event
- ✓ Reporter

FDA, 2018

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Evaluation of Case Reports

- Adverse event occurrence in expected time
- Absence of symptoms prior to exposure
- Positive dechallenge or rechallenge
- Consistent with pharmacologic effects
- Consistent with known effects in the class
- Support from pre-clinical studies, clinical trials
- Absence of alternative explanations

FDA, 2018

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Elements of an Informative Postmarketing Report

- Description of adverse event
- Suspected and concomitant product therapy details (e.g., dose, dates of therapy)
- Patient characteristics (e.g., age, sex), baseline medical condition, co-morbid condition, family history, other risk factors
- Documentation of the diagnosis
- Clinical course and outcomes
- Relevant therapeutic measures and laboratory data
- Dechallenge and rechallenge information
- Reporter contact information
- Any other relevant information

FDA, 2018

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Exercise

- Read each case reports and classify them as:
 - Valid and non-valid case
 - Informative and non-informative case
 - Related or not related to the medication

Exercise	
Case	Valid/NV, Informative/NI, Related/NR/Unk
Report from a caregiver related to an elderly patient who received unspecified medication and died	
Report from a nurse related to a 16 year-old male HIV patient who was on remission but developed disseminated candidiasis that required administration of fluconazole during 3 days and developed generalized rash	
Spontaneous report from a cardiologist related to an 85-year old female who was on propranolol for 24 h and developed renal failure	

