

# Company Core Data Sheets and Core Safety Information Creation - Maintenance – Implementation

In-depth Seminar - Instructor: A.L. Fontaine, M.D.  
January 20-21, 2010 - Radisson Plaza-Warwick, Philadelphia

## Seminar Program

### Day 1

7:30 Registration and Breakfast

8:00 Instructor's welcome, introduction of participants

#### 8:30 **The Core Data Sheet as a Corporate Labeling Control Tool – Part I**

- General principles of the use of a CCDS as the keystone of a company-internal system to direct local labeling
- Core labeling without CCDSs; pros and cons of using approved local labeling as global reference documents
- Definitions: CCDS, Company Core Safety Information, Development Core Safety Information
- Level of safety information to be included in a CCDS; what should be mandatory for local implementation
- Core healthcare professional information and core patient information
- The scope of CCDS content and a core labeling system: Medical content, pharmaceutical content, administrative content – What makes sense? What does not?
- Possible CCDS formats and features
- Pros and cons of local labeling formats as templates for CCDS structure and section content

10:15 Break

#### 10:30 **The Core Data Sheet as a Corporate Labeling Control Tool – Part II**

- Content microstructure and effective paragraphing
- Partial repetition and cross-referencing in a CCDS
- Business rules for the processing of CCDS content by local affiliates
- Criteria for determining whether local labeling is "sufficiently similar" to core labeling
- Who can decide whether a local deviation from core safety information is acceptable
- Keeping records of CSI decisions and of deviations from core labeling and their history
- Principles of implementation tracking
- Main sources of potential labeling ambiguity
- Consistent use of terminology
- Writing a CCDS in English for foreign-language readers
- Beginning with prevention of medication errors in the CCDS

12:00 Lunch break

#### 1:00 **Company Core Safety Information: Recommendations of the CIOMS Working**

#### **Groups and Current Regulatory Expectations – An Overview**

- CIOMS' understanding of the purpose of core safety information
- CIOMS' description of the threshold for including safety information in labeling in the light of current regulations and regulatory guidelines
- CIOMS' description of relevance factors that may lead to threshold modifications
- CIOMS' suggested rules for determining expectedness – contrasted with labeling practice

#### 1:45 **Alerting Users About Risks – General Considerations**

- Review of concepts: Possible, likely, unlikely, proof, well established
- Review of concepts: Reasonable possibility, reasonable causal association, reasonable evidence of causal association, some basis to believe, reasonable suspicion
- Review of concepts: Speculation, inability to rule out
- Sources and consequences of subjectivity and inter-decider variability in decision making on safety alerts
- To what extent and how we can reduce inter-decider variability
- The value of investigator causality assessment and "causality scales," and the role of the sponsor and regulatory agency

3:00 Break

#### 3:15 **Populating the Adverse Reactions and Interactions Sections of a CCDS/CCSI**

- Review of current local requirements and guidelines on the content and format of the Adverse Reactions section
- Creating a truly global Adverse Reactions section - Is it possible? How to do it.
- What exactly should we provide proactively to meet affiliate needs around the globe, and how can we capture this information?
- Are there exceptions to the rule that only "adverse reactions for the purposes of labeling" are provided? Is there a place/use for mixed ADR/AE tables in core labeling?
- A simple algorithm for deciding how to "slice and group" information for inclusion in adverse reaction tables
- Separate lists for clinical trial adverse reactions and postmarketing reactions? What makes sense for CSI?

- Appropriate use of SOCs and allocation of adverse reactions - How to make up for the separation of information caused by SOCs?
- Where to put and how to present class reactions
- Which frequency information to provide, and how
- When and how to provide information about the potential severity of adverse reactions
- Can everything in the Adverse Reactions section be mandatory for local submission?
- Review of current local requirements and guidelines on the content of the Interactions section
- Threshold criteria for including interactions in the Interactions section
- When to elevate interactions information to the Warnings level; where to discuss precautions related to interactions; what to discuss under Pharmacokinetics
- When to talk about interactions information in the adverse reactions section
- Whether to include trivial "additive adverse effect" interactions
- What to do if the clinical relevance of pharmacokinetic effects is unclear
- Class interactions; interactions predicted based on pharmacokinetic characteristics
- Threshold criteria for and placement of information about drug-laboratory test interferences

5:15 End of Day One

## Day 2

7:30 Breakfast

### 8:00 **Populating the Adverse Reactions and Interactions Sections of a CCDS/CCSI**

Continued

### 9:15 **How Labeling Supports the Process of Selecting the Right Medicine for the Right Patient/Consumer**

- Generic process of medication selection
- The role and information needs of the patient/consumer and healthcare professionals
- How labeling meets these needs
- The logic and limitations of labeling structures in capturing the relevant information
- The concepts: Indication, target population for use, inclusion criteria, intent of use, exclusion criterion, contraindication, relative contraindication, and advice to consider avoidance
- What we mean when we say a product is safe and effective
- The elements of a positive benefit-risk balance; factors to weigh
- Threshold criteria for including benefit claims
- Threshold criteria for using a risk as a basis for a categorical exclusion of a population subset from treatment (absolute contraindication)
- Pointing to the need for individualized decision making in a way that reflects the anticipated proportion of "opt-outs"
- The concept of "non-indication"
- The concept of "prohibited mode of administration"
- Advice to discontinue in case of an adverse reaction
- Stringency of advice; "should not" and other terminology issues

10:15 Break

### 10:30 **Populating the Indications and Contraindications Section of a CCDS**

- Expressing criteria in positive or negative terms – practical approaches for borderline situations
- The hypersensitivity-contraindication dilemma
- Are contraindication lists always complete? Why not, and where to put the rest?
- Section placement of "non-indications" and information about "prohibited modes of administration"
- How much information to provide per contraindication

### 11:30 **Populating the Warnings and Precautions Section of a CCDS – Placement of information on Use in Specific Populations**

- Threshold criteria for elevating risks to the warnings level – relevance criteria and level of certainty
- Business rules for the processing of warnings into local labeling
- Subsection themes and subsection order
- Information on the ability to drive and operate machinery – Should we have a separate section in the CCDS? Should we follow the EU rules for including such information?
- Information needed to choose a pregnancy category; FDA's proposed rule and current EU guideline
- Creating a Use in Specific Populations section for core labeling – pros and cons

12:30 Lunch break

### 1:15 **Other Sections, Other Aspects**

- Critical review of use cases for an elaborate Clinical Studies section at various points of a product's life cycle.
- Maintaining clinical pharmacology and preclinical safety information in a CCDS
- The changing content of a CCDS/CCSI Dosage and Administration section for an aging product
- Risk information outside Adverse Reactions, Interactions and Warnings and Precautions

### 2:00 **Core Labeling and Controlled Terminology**

- How terms function in risk communication
- Review of key points of the MSSO's "MedDRA and Product Labeling: 'Best Practices' Recommendations"
- Principles of good term grouping
- Risk communication issues associated with changeover of labeled terms from other terminologies to MedDRA
- Term grouping and calculating/estimating incidence rates and adverse reaction probabilities

### 2:45 **Regulatory Considerations and Strategies**

- Labeling harmonization: Comparison of viewpoints and objectives of companies and regulatory authorities
- How to make sure we understand the position of a local regulatory agency
- Considerations and strategies: Regulatory agency rejects a proposed safety change
- Considerations and strategies: Arguing against a change requested by a regulatory agency
- The role of local affiliate staff in "negotiating" with regulatory authorities

3:30 Break

### 3:45 **Development Core Safety Information and Development Core Data Sheets**

- Definitions: CCSI, DCDS, Target Product Profile, Target Product Profile for use with FDA

- DCSI and CSI for a marketed product – same thresholds for including safety information?
- Measures to limit subjectivity in decision making across the development and marketing phase
- When to start with a DCDS to get maximum benefit

- Features of a DCDS
- Preparing for the revision of safety information at the end of the development program

4:45 End of Seminar

**Venue Information:** January 20-21, 2010. Radisson Plaza-Warwick Hotel, 1701 Locust Street , Philadelphia PA 19103· United States. Phone: +1 (888) 201-1718 or +1 (215) 735-6000. For hotel room reservations, please contact the hotel directly.

**Registration:** By phone: Call +1(610)269.3933 By fax: Fax registration form to +1(484) 698 7706 By mail: Mail the registration form (with check, if applicable) to Pharmiceutics LLC, 109 Holly Drive, Downingtown, PA 19335, USA.

### Registration Form

Please register me for the **“Company Core Data Sheets and Core Safety Information”** Seminar, **January 20-21, 2008** Radisson Plaza-Warwick Hotel, PA, USA - **Fee: US\$ 2,195.-** The fee includes workshop material, 2 continental breakfasts, break refreshments, 2 luncheons. The fee does not include dinner, accommodation and transportation.

The seminar is open to pharmaceutical company employees only; admission of other interested persons only on invitation by Pharmiceutics LLC.

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