

CCC POINT OF VIEW: RISK EVALUATION AND MITIGATION STRATEGIES (REMS)

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We've read that REMS may add 6-9 months to the FDA approval process, while others say a well-designed REMS can streamline the approval process. Can you clarify?

The approval process should not be unduly delayed if companies do their homework. We help clients conduct an assessment of REMS best practices, including reviewing a few dozen drugs that have implemented risk management or risk minimization programs reviewed by FDA (e.g., Lotronex, Xyrem), as well as drugs currently with REMS (e.g., Entereg and tetrabenzine). We also assemble our dream team of REMS experts who have advised other companies that market drugs with similar, serious risks. They can help to ensure that the REMS is compatible with established distribution, procurement, and dispensing systems. And of course, a company must have an open and ongoing dialogue with the FDA.

Will or do post approval marketing tactics change with REMS? How about post approval goals in general?

Companies with REMS should not have to change marketing goals **if** they have been committed to fairly balanced promotion and comprehensive education for their promoted drugs. They must however change their mindset about REMS to avoid what we've coined the "black-eye syndrome."

A REMS requirement should not be perceived as a brand deficit. Industry must view REMS positively versus something that is merely required. By employing educational strategies that reframe a REMS in parallel with implementation, companies can help stakeholders better understand purpose and value. Ultimately, it's an opportunity to proactively manage the communication of critical information.

To quote the Chair of our company's Advisory Board, Wayne Pines, former FDA Associate Commissioner, and REMS author, REMS must be viewed by companies "not as a burden, but as an opportunity to position a drug for maximum best use."

What are the basic best practice steps in developing a REMS and how do they differ per therapeutic class?

Start early: begin discussing risks in the pre-clinical phase

Think long-term: never forget that the complete REMS program must be submitted to FDA no later than at 18 months, at 3 years, and then again at 7 years

Involvement of communication experts: To date, communications pros have not been squarely integrated into REMS planning teams. This is not productive because REMS are essentially communications programs at the very highest level. Risk information must be understood and needs to result in safer use outcomes. We advise our clients to invite corporate communications, marketing communications and other messaging veterans to the strategic planning table when REMS are being designed.

One of our company's independent risk management experts, Dr. Deborah Leiderman, former Director of the Controlled Substance Staff at the FDA, puts communication right in the middle of the formula for an effective REMS: identify, communicate and correct.

Go inside the company: Implementation and follow-up execution is entirely the manufacturer's responsibility. Communication with all company employees involved in drug marketing, especially the field sales force, is vital.

How does REMS affect different sectors of the industry? (marketing, clinical, sales, drug patent, drug development)

Internal stakeholders need to work hand in hand to effectively define and act on critical points for risk management. That's why the biggest change and challenge for these diverse sectors is learning to break out of their silos to collaborate. REMS is not just one function's responsibility. Global executives must actively communicate across cross-functional teams to manage risk throughout all drug development phases. In this way, companies will become more sensitive to the implications of early planning on drug approval/ marketing (cause and effect), engage in more effective long-term planning for product development and approvals, and be able to agree on sustainable process improvement.

Plus, don't exclude promotional agencies. They should be included in relevant discussions, and not kept in the dark.