



19th Congress of the European Association of Hospital Pharmacists Barcelona, Spain, 26-28 March 2014

Seminar N6 – Drug shortages: Physicians' perspective

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Conflict of interest: No financial relationships to disclose

Head of the Dept. of Hematology, Oncology, and Tumor Immunology Chairman of the Drug Commission of the German Medical Association Editor of "DER ARZNEIMITTELBRIEF" (ISDB) Member of the EMA Management Board



Drug shortages: Physicians' perspective -Agenda

- Essential medicines, drug shortages: Definitions
- Looking back at the (multifaceted) root causes of drug shortages
- > "Drug shortages: A complex health care crisis".
- "Medication shortages threaten cancer care".
- · Impact on patients and their care in oncology
- Ethical issue: Coping with critical drug shortages
- "Near future: Drug shortages are anticipated to continue".
- > Short/medium term actions to prevent/manage supply shortages



Essential medicines - definitions

"A *medically necessary drug product** is one that is used to treat or prevent a serious disease or medical condition for which there is no alternative drug, available in adequate supply, that is judged by FDA medical staff to be an adequate substitute".

*Kweder SL & Dill SD: Clin. Pharmacol. Ther. March 2013

Essential medicines are intended to be available within the context of functioning health systems at all times in adequate amounts, in the appropriate dosage forms, with assured quality, and at a price the individual and the community can afford.





Drug shortage - definitions

Drug shortage*:

"The total supply of all clinically interchangeable versions of an FDA-regulated drug product is inadequate to meet the projected demand at the user level".

*http://www.fda.gov/downloads/AboutFDA/ReportsManualsForms/Reports/UCM277755.pdf.

Drug shortage ≠ *supply bottleneck*





Mayo Clin Proc. March 2014;89(3):361-373





A Drug Supply Chain Example From Supplier to Patient





ingredient; increased demand; economic reasons

www.fda.gov/Drugs/DrugSafety/DrugShortages/ucm277626.htm



Economic and Technological Drivers of Generic Sterile Injectable Drug Shortages

J Woodcock¹ and M Wosinska[†]



CLINICAL PHARMACOLOGY & THERAPEUTICS | VOLUME 93 NUMBER 2 | FEBRUARY 2013



Neuromodulator 9%

Electrolyte/Nutrition

11%

Drug shortages followed by FDA, by drug classes

Drug classes with five or fewer

shortages

33%

Hormonal 6%

Antibiotic

13%









The Shortage of Essential Chemotherapy Drugs in the United States

Mandy L. Gatesman, Pharm.D., and Thomas J. Smith, M.D.

For the first time in the United States, some essential chemotherapy drugs are in short supply. Most are generic drugs that have been used for years in childhood leukemia and curable cancers —

> The main cause of drug shortages is economic. If manufacturers don't make enough profit, they won't make generic drugs.

Perspective

N ENGLJ MED 365;18



Michael P. Link, Stanford University School of Medicine, Stanford, CA Kanen Hegetty, American Society of Christel Oncology, Alexandria, VA Hegop M. Kenterjan, MD Anderson Cancer Center, Houston, 7X

Reason

- Increased national and worldwide demand for oncology drugs
- Shortages of supply of raw materials
- · Production problems; contamination of materials
- · Aging production plants
- · Limited inventories of generic drugs to reduce company costs
- Limited profit margins for generic drugs; Medicare ASP + 6% reimbursement system

In Europe, where there is no such Medicare rule, the prices of generic drugs are higher than in the United States, and the prices of brand drugs are lower (because of agreements between drug companies and governments). This maintains a reasonable profit margin for generic drugs, allowing competition to continue and largely prevent-

ing drug shortages.

JOURNAL OF CLINICAL ONCOLOGY





Medication Shortages Threaten Cancer Care

The oncology community and the FDA tackle ongoing drug shortage problem Concer Jackary 15, 2012

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HO Model List of ntial Medicines

18th list (April 2013) (Final Americanouts - October 2013)

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Clinical Dilemmas and a Review of Strategies to Manage Drug Shortages Anne Elise Rider, Derek J. Templet, Mitchell J. Daley, Carrie Shuman and Leticia V. Smith Journal of Pharmacy Practice 2013 26: 183 originally published online 3 April 2013 DOI: 10.1177/0897190013482332

Regimen	Medications
FOLFOX	5-fluorouracil, oxaliplatin, leucovorin
XELOX	capecitabine, oxaliplatin
ABVD	doxorubicin, bleomycin, vinblastine, dacarbazine
Stanford V	mechlorethamine, doxorubicin, vinblastine, vincristine, bleomycin, etoposide, prednisone
MOPP	mechlorethamine, vincristine, procarbazine, prednisone

- One chemotherapy agent in short supply or unavailable impacts multiple treatment regimens for several types of cancer (e.g., doxorubicin)
- Chemotherapy shortages may contribute to adverse patient outcomes (e.g., increased toxicities, decreased efficacy) and/or elimination of a curative regimen (e.g., shortage of cytarabine, backbone of AML treatment)
- Drug shortages likely contribute to delays in providing chemotherapy



National survey on the effect of oncology drug shortages on cancer care

ALI MCBRIDE, LISA M. HOLLE, COLLEEN WESTENDORF, MARGARET SIDEBUTTOM, NIESHA GRIFFITH, RAYMOND J. MULLER, AND JAMES M. HOFFMAN



• Standard treatment of many oncology protocols for childhood,

hematologic, and gynecologic protocols

• Equivalent dosing for substitute regimes often absent, substitutions

not based on evidence gathered from randomized controlled trials

Medication errors

Am J Health-Syst Pharm. 2013; 70:609-17



The impact of drug shortages on patient care and clinical trials in oncology

- Many shortages invisible to the ordering prescriber because they can be managed by the pharmacists
- Number of pts. harmed difficult to quantify
- Risks of drug shortages: increased risk of medication errors and/or adverse patient outcomes
- Patients treated with an alternative therapy (for which clinicians may have limited familiarity)
- Drug of choice unavailable/delay in therapy
- > real patient harm; e.g., higher relapse rate/reduced survival
- Rationing of chemotherapy because of shortages



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Event	No. (%) Respondents*
lear-miss medication error (n = 39)	
Wrong drug	11 (28)
Wrong dosage conversion	10 (26)
Wrong drug concentration	8 (21)
Delayed or omitted drug	3.(8)
Inadequate supply to prepare dose	3 (8)
Details unknown	4 (10)
Medication error that reached a pt (n = 15)	
Wrong drug	2(13)
Wrong dosage conversion	7 (47)
Wrong drug concentration	3 (20)
Delayed or omitted drug	1 (7)
Extra dose	2 (13)
Adverse pt outcome (n = 40)	
Increased toxicity	20 (50)
Disease progression	6 (15)
Cardiac event	2 (5)
Emotional stress	1 (3)
Details not disclosed	11 (28)



N ENGLJ MED 367;26 NEJM.ORG DECEMBER 27, 2012

What impact do drug and biological product shortages have on research and clinical trials? What actions can FDA take to mitigate any negative impact of shortages on research and clinical trials?

The impact of drug shortages on cancer clinical trials

The shortage of some cancer drugs is not just affecting patients currently undergoing standard or non-investigational treatment, but it is also having a significant negative impact on current and future cancer clinical trials. Approximately half of all active cooperative group cancer clinical trials have at least one drug on the shortages list.

Furthermore, as patients are recruited for clinical research trials with the intent to receive an investigational therapy, the treatment described in the consent form details both the benefits, side effects, and other standard of care treatment options. It is concerning that a patient who opts to receive an investigational treatment in combination with an existing drug, which is short supply, could have instead elected to receive alternative, standard treatment – perhaps in a more timely way. Treatment delays of days to months are critical in the life of a cancer patient and could limit their chances for a cure or remission of their disease.

Another residual impact of drug shortages is the delay in obtaining the data necessary to bring new cancer therapeutics to patients. With more than 400 cancer agents in various stages of development, it is imperative that cancer clinical trials continue uninterrupted in order to obtain the necessary data to seek approval of new anti-cancer drugs as soon as possible.



Why drug shortages are an ethical issue

Wendy Lipworth 1,2 and Ian Kerridge2,3

Australasian Medical Journal [AMJ 2013, 6, 11, 556-559]

Chemotherapy Drug Shortages in Pediatric Oncology: A Consensus Statement Matthew DeCamp, Steven Joffe, Conrad V. Fernandez, Ruth R. Faden and Yoram Unguru

Pediatrics 2014;133;e716

Coping With Critical Drug Shortages

An Ethical Approach for Allocating Scarce Resources in Hospitals

Philip M. Rosoff, MD, MA; Kuldip R. Patel, PharmD; Ann Scates, PharmD; Gene Rhea, PharmD; Paul W. Bush, PharmD; Joseph A. Govert, MD

Arch Intern Med. 2012;172(19):1494-1499.



Ethical issues that need to be considered attempting to understand or address drug shortages

- Drug shortages are a major threat to the delivery of "beneficent", "non-maleficent" and equitable health care
- Compelling evidence that pts. can be harmed by drug shortages
- Moral imperative to prevent further drug shortages
- Ethical approach includes transparency, fairness for pts. and health care providers, and its ability to be rapidly put in practice
- Initial response: an attempt to maximize efficiencies and to minimize wastage
- Pts.should not be treated differently depending on their (non-clinical) circumstances, e.g., insurance status, ethnicity etc.
- Youth of pts. should play a determinative role in forced rationing decisions ????



Drug shortages

Solutions: no main targets many side paths





REPORT OF THE INTERNATIONAL SUMMIT ON MEDICINES SHORTAGE

Toronto, Canada 20-21 June 2013



22 November 2012 EMA/590745/2012 Patient Health Protection Reflection paper on medicinal product supply shortages caused by manufacturing/Good Manufacturing Practice Compliance problems

4. Envisaged activities

While the causes of shortages are varied and complex, the challenge remains to effectively co-ordinate an assessment, to develop risk minimisation measures to alleviate the impact on patients, and to communicate within the Network, with international partners and with healthcare professionals, patients and the general public. On occasions EMA is being asked to coordinate the follow-up to an emerging event in the absence of an appropriate legal framework.

In some cases, the need for rapid implementation of risk minimisation measures is paramount. Short and medium term measures will be undertaken to enhance the current approach. In addition, there are some aspects which will require discussion with bodies outside the Network, e.g. in the area of medical devices.



Workshop on product shortages due to manufacturing and quality problems: Developing a proactive approach to prevention 🖂 Email 🚔 Prixe 📵 Hulp 🛃 Shara Details Documents Multimedia Related information EMA workshop on prevention of product shortages due to Title Workshop on product shortages due to manufacturing and quality problems: Developing a proactive approach manufacturing and quality problems takes place today (14/10/2013) to prevention + EMA to host workshop on Date 14/10/2013 - 14/10/2013 prevention of product shortages due to manufacturing and duality Location European Medicines Agency, London, UK problems (10/10/2013) Summary The workshop discusses how to improve existing risk-management strategies to prevent shortages due to Reflection paper on medicinalproduct supply shortages caused manufacturing and quality issues, as well as how to mitigate the impact of shortages. Registration was by by menufacturing / goodmanufacturing-practice invitation only due to limited places and is now closed. compliance problems However, the workshop will be broadcast live. (23/11/2012) Contact point: shurtagesworkshop@ema.europa.eu



Key recommendations to prevent and to manage drug/supply shortages of medicines

- Improved communication among the regulatory agencies, manufacturers, and stakeholders
- Increase authority of EMA and national agencies (e.g., FDA Safety and Innovation Act, FDASIA)
- Examine impact of current requirements on drug shortages
- Develop a National Registry
- Compile a list of essential medicines by specialty organizations
- Provide economic incentives to manufacturers of critical drugs
- Civil or monetary penalties for industry noncompliance





Draft common position between patients', consumers, and healthcare professionals' organisations on Supply Shortages of Medicines October 2013

- Article 81 of the EU Directive on Medicines for Human Use¹¹ was intended to ensure adequate supply of any given product to the market. However, there is extensive evidence of situations where pharmacies can't obtain the medicines that they need for their patients. Consideration should be given to strengthening the provisions of Article 81;
 - Françoise Charnay-Sonnek, European Specialist Nurses Organisations (ESNO)
 - Roberto Frontini and Richard Price, European Association of Hospital Pharmacists (EAHP)
 - David Haerry, European Aids Treatment Group (EATG)
 - Dr Carla Hollak, Academic Medical Centre, Amsterdam (<u>AMC</u>)
 - François Houvez, European Organisation of Rare Diseases (EURORDIS)
 - Sascha Marschang, European Public Health Alliance (EPHA)
 - Jurate Svarcaite, Pharmaceutical Group of the European Union (PGEU)



Thank you for your attention

Antonello da Messina (ca. 1430-1479) Saint Jerome in His Study

Latest Reports

Туре	Active substance	Brand	Form of administration	Revision Date	Impact
٠	Corifolitropin alfa	<u>Elonva</u>	Liquid Injection	<u>08-07-</u> 2013	Substitution
•	Levothyroxine (sodium)	Euthyrox 75 mcg	<u>tablet</u>	<u>08-07-</u> 2013	Solved
ø	Alendroninezuur colecalciferol	Fosavance 70/5600	tablet	<u>08-07-</u> 2013	Solved
•	Epirubicin	Epirubicin PCH	infusion, Injection	<u>09-07-</u> 2013	Substitution
¥	Lactulose	Lactulose PCH, RP	syrup, powder for oral use	<u>09-07-</u> 2013	Substitution is possible
¥	Enalapril	Enalapril PCH, Apotex, CF	tablet	<u>09-07-</u> 2013	Substitution is possible
¢	Isosorbide dinitrate	<u>isordii</u> <u>Titradose</u>	<u>tablet</u>	<u>09-07-</u> 2013	Substitution is possible
•	Ascorbic acid	250 and 500 mg ascorbic	<u>tablet</u>	<u>10-07-</u>	Substitution





*Kweder SL & Dill SD: Clin. Pharmacol. Ther. March 2013





FDA reveals new initiatives to deal with drug shortages

Michael McCarthy

BMJ 2013;347:16646 doi: 10.1136/bmj.16646 (Published 4 November 2013)

Seattle, USA

Under proposed rules announced on 31 October by the US Food and Drug Administration, drug makers will be required to notify the government at least six months in advance, or as far in advance as practical, if they intend to stop making a medically important drug. This rule will also apply to any interruption in a drug's manufacture that is likely to lead to a disruption in supply,1

The FDA said it prevented just under 200 shortages in 2011 and more than 280 in 2012 by working with existing and new manufacturers to ensure supply, expediting reviews to prevent shortages, and exercising "enforcement discretion in appropriate circumstances, if this would not cause undue risk to patients."

As a result of such efforts, the number of products in short supply dropped to 117 last year, the agency said. Numbers for this year are not yet available.



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