Reasons for rejection of PRO label claims: an analysis based on a review of PRO use among new molecular entities and biologic license applications 2006–2010

DeMarco C1, Clark M1, Mordin M1, Evans E1, Copley-Mermann K1, Fehnel SE1, Gnanasakthy A1

1RTI Health Solutions, Research Triangle Park, NC, USA; RTI Health Solutions, Ann Arbor, MI, USA; Novartis, East Hanover, NJ, USA

ABSTRACT

The purpose of this study was to evaluate the reasons for the denial of product label claims for patient-reported outcomes (PROs) based on an analysis of medical review sections of publicly available summary basis of approvals (SBAs) and new molecular entities (NMEs) and biologic license applications (BLAs). The goal of this research was to understand the rationale for denial of PRO label claims and to identify potential areas for improvement in drug development and the labeling process.

OBJECTIVES

- Evaluate sponsor experiences obtaining approved label claims in reviewed NMEs and BLAs
- Review "case studies" of claimed denial
- Comment on potential opportunities to improve labeling
- Identify trends in denial and approval regarding PRO label claims

METHODS

- The study included a retrospective analysis of all SBA reviews from 2006 to 2010 from the Office of Chemical Entity Evaluation and Research of the Center for Drug Evaluation and Research (CDER) and Center for Biologics Evaluation and Research (CBER).
- The review focused on the quality of life (QoL) data available in the IND, NDA, or BLA and the PRO labeling claims stated in Section II of the IND, NDA, or BLA.
- The review included all approved new molecular entities and biologics classified by CDER as NMEs and by CBER as BLAs.
- PRO instruments were identified using the FDA Drug Approval Report Webpage. PRO claims were classified as presence (≥1% of total claims) or absence (<1% of total claims).
- PRO claims were reviewed against the IND and SBA to identify specific reasons for denial.

RESULTS

- Of the 151 SBAs reviewed, 43% included at least one PRO label claim. Of the 249 unique PRO claims reviewed, only 52.1% received PRO claims. Primary reasons for denial were the lack of evidence (66.7%), poor interpretation of evidence (14.4%), and lack of demonstration of content validity (21.3%)

CONCLUSIONS

- The results of this study highlight the challenges and potential barriers to the approval of PRO label claims.
- The need for additional evidence, better interpretation of existing evidence, and improved communication strategies are critical to improving the approval rate of PRO label claims.

REFERENCES


LIMITATIONS

- The study was limited to the review of PRO label claims in the SBA and did not include a comprehensive analysis of the clinical trial data.
- The study did not account for the potential impact of regulatory guidance and changes in the labeling process over time.
- The study did not consider the role of communication strategies in improving the approval rate of PRO label claims.

Table: Products with Claims Denied by Reviewing Division

- Division of DRA
- Division of TBRA
- Division of NA

Discussion

- The results suggest that a lack of evidence is a primary reason for the denial of PRO label claims.
- The poor interpretation of evidence and lack of demonstration of content validity also contribute significantly to the denial of PRO label claims.

Conclusions

- The approval of PRO label claims is a complex process that requires substantial evidence.
- The results highlight the need for improved communication strategies and better interpretation of evidence to improve the approval rate of PRO label claims.

Appendix

- Additional tables and figures providing detailed analyses of PRO label claims by PRO type and IND.
- A comprehensive list of PRO claims and the reasons for denial.

Figure: Most Frequently Reported Reasons for Denial of Claims