Principles for Simplification of Biopharmaceutical Product Safety Labeling by Grouping Similar MedDRA® Terms for Unique Medical Concepts

Summary: Driven by business needs and based on regulatory guidance[1-4], the communication of suspected adverse reactions in labeling should be presented as unique medical concepts, rather than always as individual MedDRA Preferred Terms (PT). This would enhance understandability of the concerned clinical concepts by the health care community. MLGs would also facilitate calculation of frequencies of suspected adverse reactions from clinical trial data and for comparison of frequencies between products (and, perhaps, indications, populations, or posology).

Although the established Medical Dictionary for Regulatory Activities (MedDRA) hierarchy provides groupings of related and meaningful medical concepts, these groupings can be of a broader scope, beyond the medical concepts intended for the label. Other types of groupings may also be needed to appropriately cluster individual MedDRA terms that convey the same clinical concept, thus supporting clearer communication. To this effect, several organizations have already independently created their own groups of medically related terms.

It is proposed that globally harmonized principles, points to consider, and pragmatic recommendations for development of MedDRA Labeling Groupings (MLGs) be developed by a Council for International Organizations of Medical Sciences (CIOMS) working group. The desired outcome is an international approach which would be available for voluntary consideration.

Potential **advantages/benefits**:

- Support implementation of existing regulatory guidance;
- Foster harmonization of organization-specific and product-specific approaches;
- Promote consistency, simplification, and understandability of medical concepts by the healthcare community in meaningful ways, i.e., facilitate communication of important safety concepts;
- Improve ability to calculate frequencies of suspected adverse reactions from clinical trial data and improve ability to compare safety profiles between products;
- Avoid dilution of true medical effects due to the high granularity of MedDRA, without losing specificity of the medical concept;
- Reduce complexity of MedDRA-coded data for stakeholders;
- Clearly bridge a medical event and the expression in MedDRA coding language;
- Promote international harmonization while permitting flexibility in application.

Points to consider:

- Principles for development and application of MLGs;
- Specificity of MLGs and included terms, i.e., ordinarily at the PT level;
- Sustainability of MLGs; and
- Implications for safety reporting (individual and aggregated reports) and signal management.

[1] Commission Implementing Regulation (EU) No 520/2012 of June 2012, available at http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:159:0005:0025:EN:PDF

[2] A guideline on Summary of Product Characteristics (SmPC) September 2009, available at http://ec.europa.eu/health/sites/health/files/files/eudralex/vol-2/c/smpc_guideline_rev2_en.pdf

[3] http://www.meddra.org/sites/default/files/guidance/file/9610-1910_datretptc_r3_12_sep2016.pdf

[4] http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm075057.pdf