Advancing Premarket Safety Analytics

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Disclaimer



 The views and opinions expressed in this presentation are those of the presenter and do not represent official policy or position of the FDA.

• I have no relevant financial or non-financial relationships to disclose.



FDA Medical Queries (FMQs)

Background

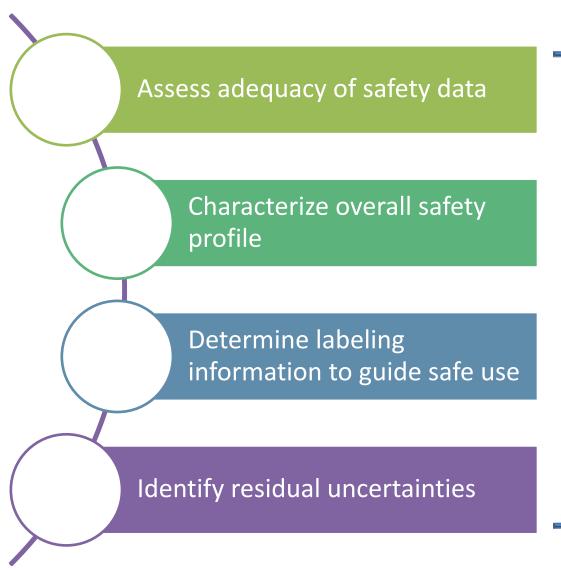
Agenda

FDA Medical Queries (FMQs)

Standard Safety Tables and Figures (STFs)



Goals of FDA Clinical Safety Assessment



Premarket Safety Analytics

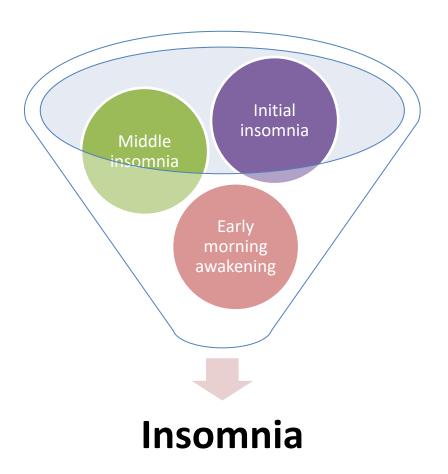
- FMQs
- STFs

What are FDA Medical Queries (FMQs)?



 Standardized groupings of related MedDRA¹ PTs developed by FDA review staff

Each FMQ represents a medical concept





Goals of FMQs



Standardized approach to grouped AE analysis



Improve safety signal detection in clinical trial datasets

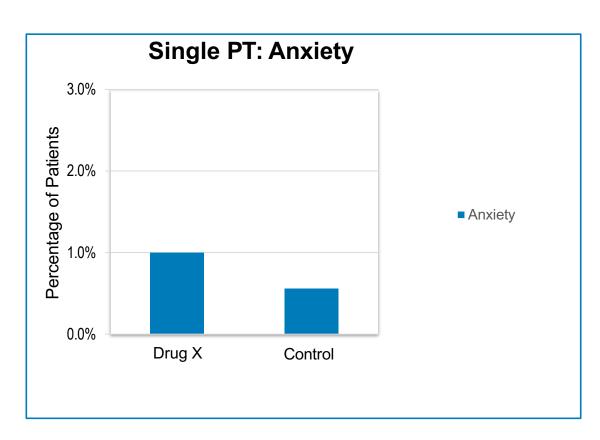


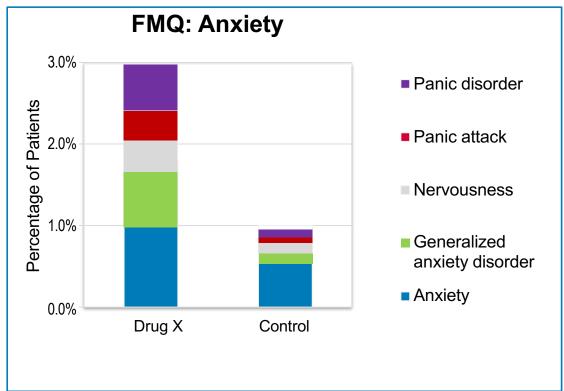
- Different verbatim terms for similar clinical events
 - Different MedDRA PTs can be used to code for the same medical concept
 - Example: "Abdominal pain" may be reported as abdominal pain, abdominal pain lower, gastrointestinal pain, visceral pain, or abdominal discomfort.
- Adverse Events (AEs) may manifest in related, but different ways.
 - Example: A "rash" caused by drug hypersensitivity may present with an erythematous rash, a macular rash, macular-papular rash, papular rash, or morbilliform rash.

Single PT Analysis vs. FMQ



"Anxiety" safety signal may only become apparent when all variations of anxiety are included.





Inconsistent Standards



Related PTs are not Grouped



Potential missed safety signals

FMQ: Narrow vs. Broad Queries

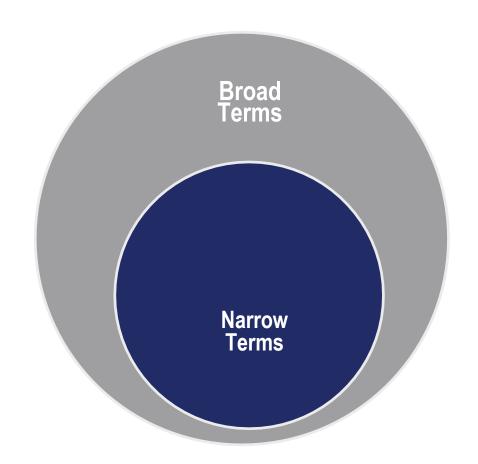


Narrow FMQ terms

- Specific for the medical concept
- > ~90% probability that the medical concept occurred

Broad FMQ terms

- "Cast a wider net" than narrow query terms for signal detection
- Less specific
- Provide reasonable assurance (more than ~30% probability) that the medical concept occurred



FMQ Ground Rules: Narrow Queries

PTs that are near-synonyms of the FMQ concept

• "Abdominal discomfort" in FMQ Abdominal Pain

PTs that are subgroups of the FMQ concept

• "Anaemia neonatal" in FMQ Anemia

PTs that specify an etiology for the FMQ concept

• "Uremic Pruritus" in FMQ Pruritus

PTs that ensure the occurrence of the FMQ concept

• "Aortic Rupture" in FMQ Hemorrhage

FMQ Ground Rules: Broad Queries

PTs that may result in the FMQ concept

• "Osteopenia" in FMQ Osteoporosis

PTs that provide laboratory, radiologic, or other diagnostic test results reasonably suggestive of an FMQ, including PTs with ambiguous results such as "abnormal"

 "Blood glucose abnormal" in FMQ Hyperglycemia

PTs reasonably suggestive of the FMQ concept, but not required by the FMQ concept

• "Bronchospasm" in FMQ Hypersensitivity

PTs that indicate a "carrier" status for FMQ concepts that specify an infectious disease

"Bacterial disease carrier" in FMQ
 Bacterial Infection

FMQ Ground Rules: PT's Excluded from FMQ



PTs that are too vague are excluded from FMQs

- Neither a required component nor reasonably specific for the FMQ concept
 - "Nausea" would <u>not</u> be included in FMQ Migraine
- Names of laboratory, radiologic, or other diagnostic tests without a result
 - "Clostridium test"
 - PTs that provide test names without a result, but would only be performed in the presence of disease, should be included if they otherwise qualify (example: "Antipsychotic drug level" in FMQ Psychosis).



FMQs and MedDRA SMQs

FMQs attempt to capture all instances of an AE, even if PT indicates a "non-drug-related" cause:

FMQ Pancreatitis

(Does Contain)



SMQ Acute Pancreatitis

(Does Not Contain)



Alcoholic Pancreatitis
Autoimmune Pancreatitis
Obstructive Pancreatitis
Pancreatitis Viral

Algorithmic FMQs



- Narrow contains PTs highly specific to the FMQ concept; indicates that the FMQ occurred.
- Broad casts a wider net to capture additional cases of the FMQ concept.
- Algorithmic uses multiple datasets to leverage more of the available information:
 - Adverse event datasets
 - Laboratory datasets
 - Concomitant meds datasets
 - Medical history datasets
 - Temporal relationships

Example Mock Algorithm:

- 1. PT + PT
- 2. Lab value >ULN
- 3. PT + Con Med within 3 days
- 4. PT + Medical History



Algorithmic FMQ Example: Drug-Induced Muscle Injury

Patients qualify for the algorithm if they meet any of the following criteria:

- 1. Any Rhabdomyolysis FMQ Narrow term
- 2. Urine myoglobin >ULN
- 3. CPK >5 x ULN **AND NO**:
 - CPK >ULN at baseline OR
 - CPK-MB/CPK >0.05 with start date within 3 days
- 4. [PT Myalgia + PT Muscular Weakness + (PT Myoglobin Urine Present OR PT Chromaturia)] with start date within 7 days of each other

ULN= Upper limit of normal, CPK = creatine phosphokinase





1.	Arthritis	27.	Diabetic Ketoacidosis	53.	Hypotension	79.	Pyrexia
2.	Abdominal Pain	28.	Diarrhea	54.	Insomnia	80.	Rash
3.	Abnormal Uterine Bleeding	29.	Dizziness	55.	Irritability	81.	Renal & Urinary Tract Infection
4.	Acute Coronary Syndrome	30.	Dry Mouth	56.	Invest Agent Abuse Potential	82.	Respiratory Depression
5.	Acute Kidney Injury	31.	Dysgeusia	57.	Leukopenia	83.	Respiratory Failure
6.	Alopecia	32.	Dyspepsia	58.	Lipid Disorder	84.	Rhabdomyolysis
7.	Amenorrhea	33.	Dyspnoea	59.	Local Administration Reactions	85.	Seizure
8.	Anemia	34.	Erectile Dysfunction	60.	Malignancy	86.	Self-Harm
9.	Anaphylactic Reaction	35.	Erythema	61.	Mania	87.	Sexual Dysfunction
10.	Angioedema	36.	Excessive Menstrual Bleeding	62.	Myalgia	88.	Somnolence
11.	Anxiety	37.	Fall	63.	Myocardial Infarction	89.	Stroke-TIA
12.	Arrhythmia	38.	Fatigue	64.	Myocardial Ischemia	90.	Syncope
13.	Arthralgia	39.	Fracture	65.	Nasopharyngitis	91.	Systemic Hypertension
14.	Back Pain	40.	Fungal Infection	66.	Nausea	92.	Tachycardia
15.	Bacterial Infection	41.	Glaucoma	67.	Opportunistic Infection	93.	Tendinopathy
16.	Bacterial Vaginosis	42.	Gout	68.	Osteoporosis	94.	Thrombocytopenia
17.	Bronchospasm	43.	Gynaecomastia	69.	Palpitations	95.	Thrombosis
18.	Cachexia	44.	Hemorrhage	70.	Pancreatitis	96.	Thrombosis (Arterial)
19.	Cardiac Conduction Disturbance	45.	Headache	71.	Paraesthesia	97.	Thrombosis (Venous)
20.	Cholecystitis	46.	Heart Failure	72.	Parasomnia	98.	Tremor
21.	Confusional State	47.	Hepatic Failure	73.	Peripheral Oedema	99.	Urinary Retention
22.	Constipation	48.	Hepatic Injury	74.	Pneumonia	100.	Urticaria
23.	Cough	49.	Hyperglycemia	75.	Pneumonitis	101.	Vertigo
24.	Decreased Appetite	50.	Hyperprolactinaemia	76.	Pruritus	102.	Viral Infection
25.	Decreased Menstrual Bleeding	51.	Hypersensitivity	77.	Psychosis	103.	Volume Depletion
26.	Depression	52.	Hypoglycemia	78.	Purulent Material	104.	Vomiting



Resources

FMQ Version 2.1 (current version) posted at:

https://www.regulations.gov/docket/FDA-2022-N-1961/document

All versions of the FMQs and related resources will be made publicly available at FDA's Study Data Standards Resources webpage: https://www.fda.gov/industry/fda-data-standards-advisory-board/study-data-standards-resources

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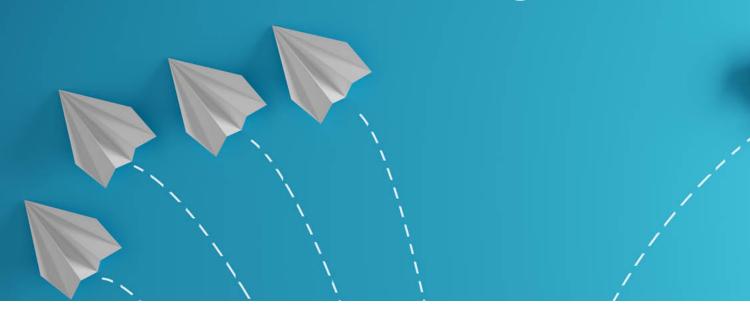
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Standard Safety Tables & Figures (ST & F)

Why Standard Tables & Figures?

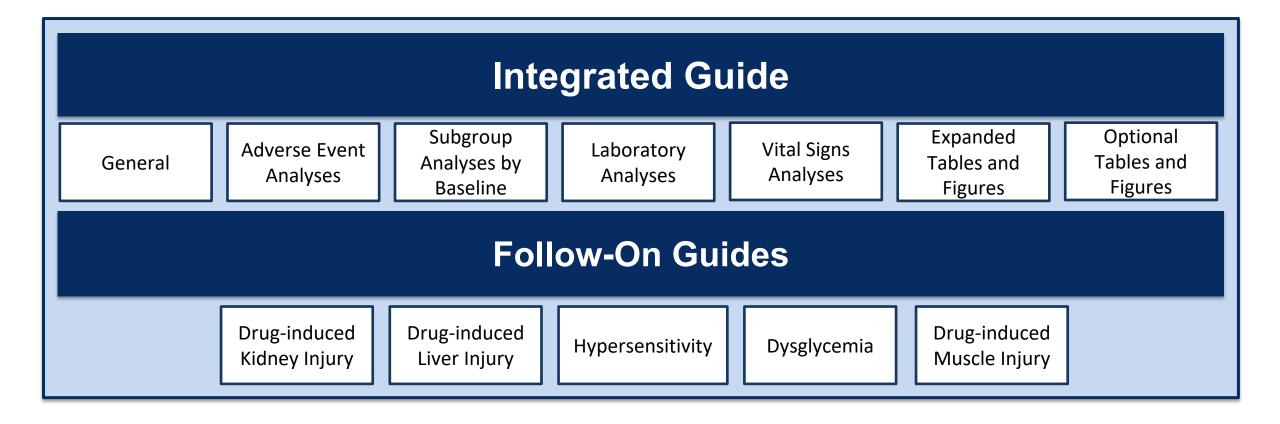




- Standardize safety signal evaluation across divisions
- Uniform safety data presentation and visualization (e.g., color, table layout)
- Follow formatting standards used in major medical journals
- Save reviewer time

Standard Safety Tables & Figures Organization





Standard Safety Tables & Figures Integrated Guide (ST&F IG): Components



Integrated Guide

General

- Clinical Trials
 Summary
- Demographic and Clinical Characteristics
- Patient Disposition
- Duration of Exposure

Adverse Event Analyses

- Overview of Adverse Events
- Deaths
- Serious Adverse Events
- Adverse Events Leading to Discontinuation
- FDA Medical Queries (FMQs)

Subgroup Analyses

 Overview of certain AEs or SAEs across demographic characteristics Laboratory Analyses

- Analyses of Central Tendency
- Analyses of Abnormalities and Outliers
- DILI Screening subsection:
- Missing Data Analysis
- Potential Hy's Law Screening Plot

Vital Signs Analyses

- VS distribution by Treatment Group
- Baseline vs.
 Max/Min by
 Treatment
 Group
- Blood Pressure Post-Baseline Data

Expanded Tables and Figures

- Expanded AE Analyses
- SAEs
- TEAEs
- Expanded Laboratory Analyses
- Change Over Time
- Outlier Criteria
- Last Value on Treatment

Optional Tables and Figures

- Optional AE Analyses
- Exposure-Adjusted Analyses
- Relatedness Analyses
- Additional FMQ Tables
- Optional Laboratory and Vital Signs Analyses
- Median and Interquartile Range Plots

Standardization of Data Presentation: Tables



To ensure standardization, all generated tables follow the below formatting principles.

Table 4. Patient Disposition, Pooled Analyses 1,2

Order of the treatment columns: drug arms followed by active control, and placebo

	Drug Name Dosage X N = XXX n (%)	Drug Name Dosage Y N = XXX n (%)	Active Control N = XXX n (%)	Placebo N = XXX n (%)	Risk Difference (%) (95% CI)³
Patients randomized	n (%)	n (%)	n (%)	n (%)	-
ITT/mITT population ³	n (%)	n (%)	n (%)	n (%)	-
Safety population	n (%)	n (%)	n (%)	n (%)	-
Per protocol population	n (%)	n (%)	n (%)	n (%)	-
Discontinued study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Adverse event	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Lack of efficacy	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Protocol deviation	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Death	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Withdrawal by patient	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Discontinued study	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Death	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Lost to follow-up	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
→ Withdrawal by patient	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Physician decision	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Protocol deviation	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)

Bolded column headers

10 pt. Arial font for all table text (including headers)

Subtext is indented

Footnotes provide important definitions and context Source: [include Applicant source, datasets and/or software tools used].

Abbreviations: CI, confidence interval; ITT, intention-to-treat; mITT, modified intention-to-treat; N, number of patients in treatment arm; n, number of patients in specified population or group

¹Duration = [e.g., X week double-blind treatment period or median and a range indicating pooled trial durations].

²[Include route of administration for all treatment arms if different ROA were used in the drug development].

³ Difference is shown between [treatment arms] (e.g., difference is shown between Drug Name dosage X vs. placebo).

Standardization of Data Presentation: Figures

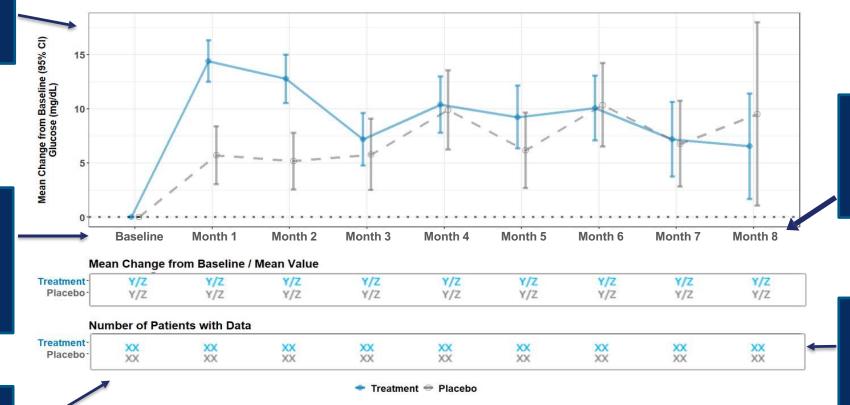


To ensure standardization, all generated figures follow the below formatting principles.

Figure X. Mean Laboratory (Chemistry) Data Change from Baseline Over Time by Treatment Arm, Safety Population, Trial X

The y-axis is scaled appropriately

Colors, symbol, and line types can be used to distinguish between series in a graph.



When the x-axis is used to represent time, labeled by protocol specified visit schedule

When displaying data over time, total "n's" are presented per time period at the bottom of the figure

Standardized color selection and consistency across trials.

Adverse Event Analyses



- Provides analysis of AEs including:
 - Serious AEs (SAEs)
 - AEs leading to discontinuation
 - FDA Medical Queries (FMQs)
 - AEs of special interest (AESIs)
- All AE tables and figures present treatment-emergent adverse events (TEAEs) as a default

Serious Adverse Events - FMQs



Adverse Event Tables also include FDA Medical Queries (FMQs) arranged by System Organ Class (SOC). FMQs are standardized groupings of adverse event terms developed by FDA reviewers.

Table 10. Patients with Serious Adverse Events¹ by SOC and FDA Medical Query (Narrow), Safety Population, Pooled Analyses²

	System Organ Class ⁴ FMQ (Narrow)	Drug Name Dosage X N=XXX n (%)	Drug Name Dosage Y N=XXX n (%)	Active Control N=XXX n (%)	Placebo N=XXX n (%)	Risk Difference (%) (95% CI) ³
Tobles are	SOC1					
Tables are arranged by SOC.	FMQ1	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
arranged by 500.	FMQ2	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
	SOC2					
	FMQ3	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
	FMQ4	n (%)	n (%)	n (%)	n (%)	X (Y, Z)

FMQs are ordered by decreasing risk difference.

Overview of Adverse Events



Table 6. Overview of Adverse Events¹, Safety Population, Pooled Analyses²

SAE determination includes all AEs that met individual SAE criteria

	Drug Name Dosage X	Drug Name Dosage Y	Active Control	Placebo	Risk
	N=XXX	N=XXX	N=XXX	N=XXX	Difference (%)
Event	n (%)	n (%)	n (%)	n (%)	(95% CI) ³
SAE	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs with fatal outcome	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Life-threatening SAEs	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs requiring hospitalization	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs resulting in substantial disruption of normal life functions	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Congenital anomaly or birth defect	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to permanent	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
discontinuation of study drug					
AE leading to dose modification of	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
study drug					
AE leading to interruption of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to reduction of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to dose delay of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Any AE ⁴	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Severe	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Moderate	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Mild	n (̂%)	n (%)	n (̂%)	n (%)	X (Y, Z)

TEAE definition and MedDRA version is also included in footnotes.

Source: [include Applicant source, datasets and/or software tools used

Treatment-emergent AE defined as [definition]. MedDRA version X.

² Duration = [e.g., X-week double-blind treatment period or, median and a range indicating pooled trial durations].

³ Difference is shown between [treatment arms] (e.g., difference is shown between Drug Name dosage X vs. placebo). ⁴ Severity as assessed by the investigator

Standard Laboratory Analyses

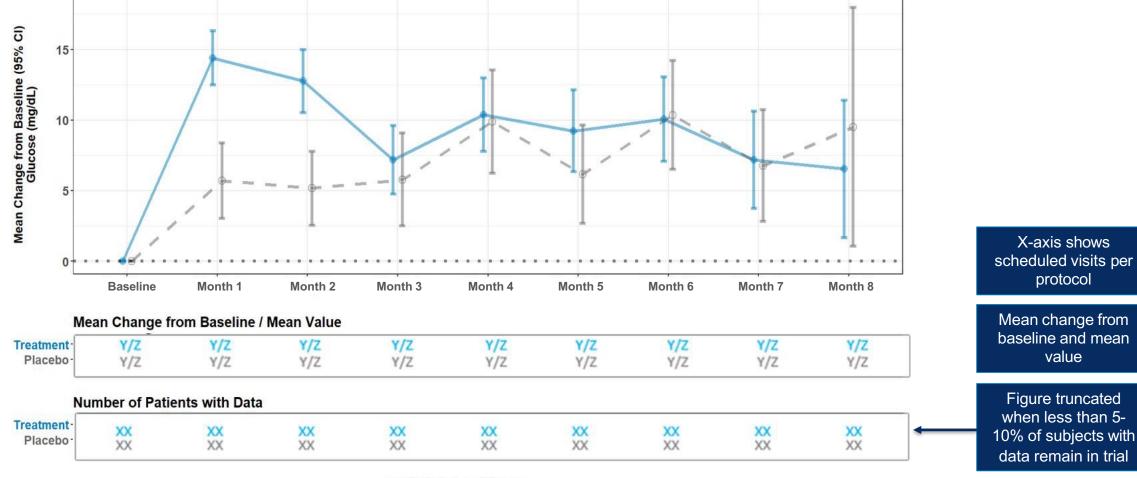


- Provides an analysis of routine laboratory parameters including:
 - Missing data analyses
 - Measures of central tendency
 - Outlier analyses
- Additional analyses can be found in the Standard Expanded Safety Tables and Figures section (Expanded Section)
 - Specific outlier criteria and analyses
 - Last value on-treatment analyses
 - Alternate tabulations and visualizations

Laboratory Analyses Over Time

FDA

Figure X. Mean Laboratory (Chemistry) Data Change from Baseline Over Time by Treatment Arm, Safety Population, Trial X



Laboratory Analyses Over Time – Expanded Section

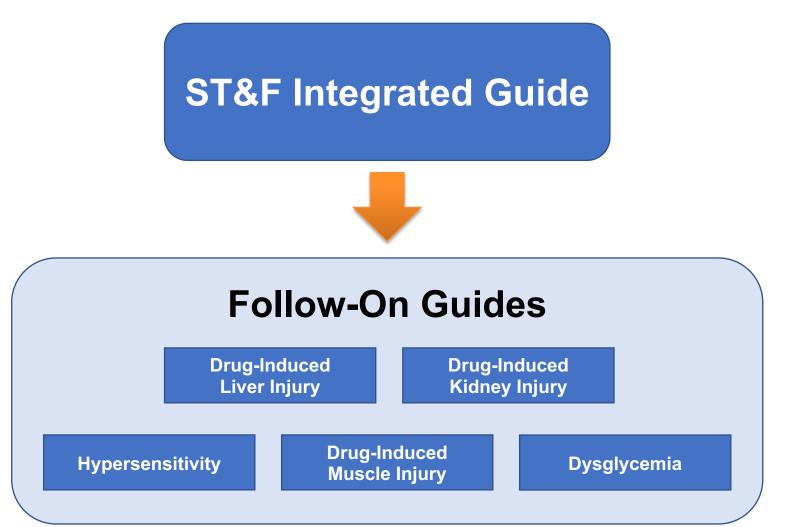
Table 45. Mean Change From Baseline for General Chemistry Data Over Time by Treatment Arm, Safety Population, Pooled Analysis (or Trial X)

			Treatment Arm Control Arm (N = X) (N = X)		Difference			
Parameter	Study Visit time ¹ (Study Day/Week/Month)	n (%) at Visit	Mean (95% CI)	Mean Change From Baseline (95% CI)	n (%) at Visit	Mean (95% CI)	Mean Change From Baseline (95% CI)	in Mean Change (95% CI) ²
	Baseline	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
Sodium (mEq/L)	Week X	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
	Week Y	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
Detection	Baseline	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
Potassium (mEq/L)	Week X	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
(111124/12)	Week Y	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)

ST&F IG vs. Follow-On Guides (FOGs)

Follow-On Guides

- Available by request
- Therapeutic areaspecific tables and figures
- More in-depth analyses



Standard Safety Tables & Figures Follow-On Guide: Components



Follow-On Guide	
1.0 - Introduction Background on ST&F	
2.0 - Screening Analyses Tables and figures from the Integrated Guide	
3.0 - Follow-On Analyses Further explore therapeutic area of interest	
4.0 - Appendix Supplemental information	

Standard Tables & Figures: DILI Follow-on Guide

For each section, an explanation of what is contained and Reviewer instructions to inform clinical interpretation of the outputs are provided.

Integrated Guide

DILI Screening Analyses

- 1. Missing Data
- 2. Hepatocellular DILI Case Screening Plot
- 3. Cholestatic DILI Case Screening Plot
- 4. Comparison of Treatment with Maximal Treatment-emergent Liver Test Abnormalities

DILI Guide

DILI Screening Analyses

DILI Follow-On Guide*

- 1. Analyses of hepatic AEs and early discontinuation between arms.
- 2. Analyses of liver biochemistry studies between arms.
- 3. Patient level analyses to determine true DILI from other etiologies.

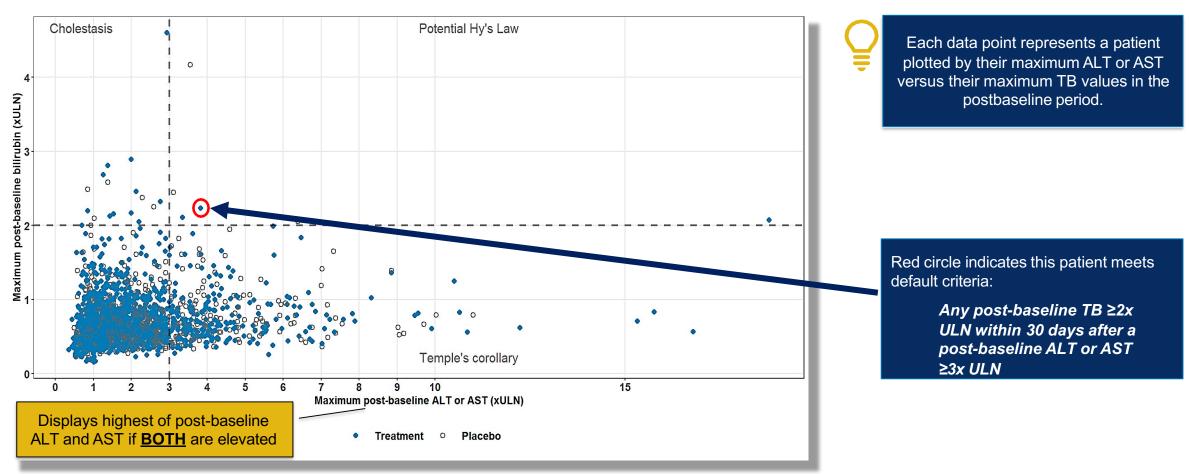
^{*}Produced upon request by reviewer

Hepatocellular DILI Case Screening Plot



Note: Default cut-offs are TB ≥ 2xULN and ALT or AST ≥ 3x ULN

Figure 12. Hepatocellular Drug-Induced Liver Injury Screening Plot, Safety Population, Pooled Analyses



DILI FOG Example Analysis: Liver Biochemistry Elevations Between Arms

Frequency of Hepatic Safety Laboratory Parameter Elevations at any Post-Baseline Visit, by Treatment Arm

Laboratory Abnormality	Active N=X	Comparator N=X	Risk Difference (95% CI) ¹
	n (%)	n (%)	(
ALT			
≥ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
≥10x ULN	n (%)	n (%)	X (Y, Z)
≥20x ULN	n (%)	n (%)	X (Y, Z)
AST			
≥ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
≥10x ULN	n (%)	n (%)	X (Y, Z)
≥20x ULN	n (%)	n (%)	X (Y, Z)
Alkaline Phosphatase			
≥2x ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
Total Bilirubin			
≥2x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
≥8x ULN	n (%)	n (%)	X (Y, Z)
Direct Bilirubin	300 AN	1602004	200000000000000000000000000000000000000
≥2x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
GGT			
≥2x ULN			
INR			
≥1.5x ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)

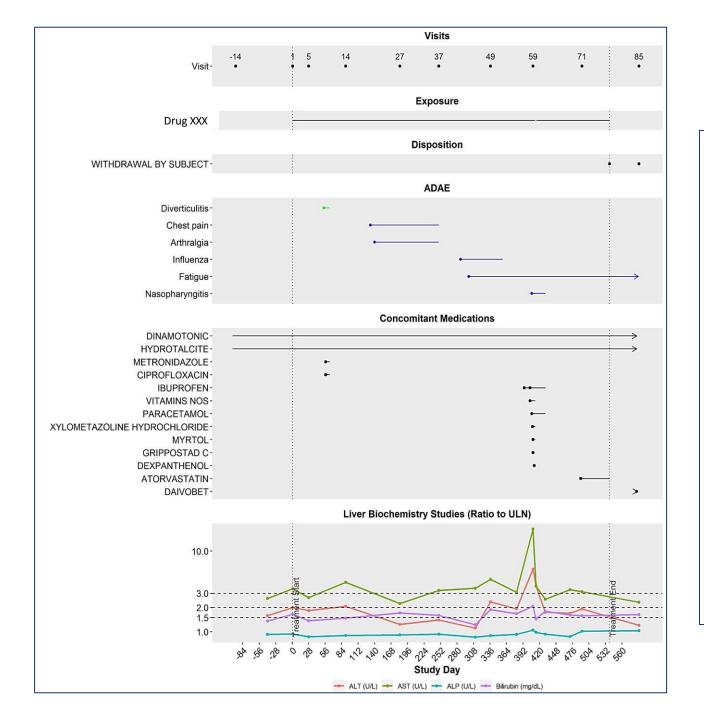
Source: [include Applicant source and/or Software tools used]

Note: The frequency represented here are based on peak levels. Appropriate cut-off for liver biochemistries should be adjusted based on the study population (e.g., pediatric population, those with underlying liver disease etc.). For patients with chronic liver disease, cut-of should be established using multiples of baseline (e.g. 2x, 3x, 5x).

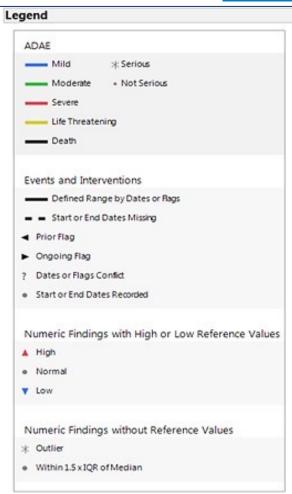
'Difference is shown between [treatment arms]. (E.g. Difference is shown between Drug Name Dosage X vs. Placebo)

Abbreviations: ALP, alkaline phosphatase; ALT, alanine aminotransferase; AST, aspartate aminotransferase; CI, confidence interval; GGT, Gamma-glutamyl transferase; INR, prothrombin international normalized ratio; ULN, upper level of normal; N, number of patients in group; n, number of patients meeting criteria

DILI FOG: Example Graphical Patient Profile









Concluding Remarks

Standard Safety Tables and Figures and FMQs

- Aid FDA clinical review staff in safety signal detection
 - Provide standard approach to categorize and group adverse events
 - Provide standard approach to safety data analysis and visualization
- Foster consistency in data visualizations and to improve efficiency

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- Preeti Venkataraman
- Qunshu Zhang
- Ramya Gopinath
- Rhonda Hearns-Stewart
- Rituparna Moitra
- Robert Temple
- Sarah Connelly
- Sarah Rodgers
- Sarita Boyd
- Scott Proestel
- Susan Duke
- Terrence Autry
- Yang Veronica Pei

