Drug Repurposing Guidebook

Building Block U232

This document defines the content of the FACT SHEET to be created for each identified tool, incentives, initiative or practice (the Building Block) introduced by public bodies or used by developers to expedite drug repurposing in Rare Diseases (RDs).

ITEM	DESCRIPTION
Building Block (BB) Title	**Initiative updating old labels - SRLC**
References	https://www.fda.gov/drugs/drug-safety-and-availability/drug-safety-related-labeling-changes-srlc-database-overview-updates-safety-information-fda-approved https://www.fda.gov/media/116594/download https://www.policymed.com/2013/08/fda-guidance-safety-labeling-changes.html https://www.sentinelinitiative.org/news-events/fda-safety-communications-labeling-changes https://healthpolicy.duke.edu/sites/default/files/2021-05/PostmarketSafety_PDS.pdf https://pubs.lib.umn.edu/index.php/innovations/article/view/495/489 https://www.accessdata.fda.gov/scripts/cder/safetylabelingchanges/index.cfm
Description	This building block describes the Safety Related Labeling Changes (SRLC) initiative by which FDA drug labels can be updated (irrespective of original sponsor's willingness to engage).
Category	Regulatory and HTA engagement

Type of BB	Regulatory
Geographical scope	US
Availability	SRLC – The FDA can request or order original sponsor(s) to make safety-related labeling changes based on new safety information that becomes available after approval of the drug or biological product. The program only applies to FDA-approved prescription drug labels.
Scope of use	These initiative can be used in select settings when trying to update an FDA drug label for safety claims (SRLCs) when new safety information becomes available.
Stakeholders involved	FDA, Sponsors (drug and biological product application holders)
Enablers/ Requirements	- Must be human prescription drugs regulated under New Drug Applications (NDAs) - Or prescription biological products regulated under Biologics License Applications (BLAs) - Or prescription drug with an approved abbreviated new drug application (ANDA), if the NDA reference listed drug (RLD) is not currently marketed - FDA expects that this results in changes to safety information in the Prescribing Information (e.g., ADVERSE REACTIONS BOXED WARNING, CONTRAINDICATIONS, WARNINGS AND PRECAUTIONS sections), but does not warrant inclusion in other sections of labeling (such as INDICATIONS AND USAGE, and DOSAGE AND ADMINISTRATION), which would not normally trigger required safety labeling changes under section 505(o)(4).
Output	- New safety information added to drug labels of existing FDA approved products post-marketing - provides this safety information to the public, including health care vendors who integrate these important prescription drug labeling updates into systems frequently accessed by health care practitioners and/or patients - changes to safety information in the Prescribing Information (e.g., ADVERSE REACTIONS BOXED WARNING, CONTRAINDICATIONS, WARNINGS AND PRECAUTIONS sections), but does not warrant inclusion in other sections of

	labeling (such as INDICATIONS AND USAGE, and DOSAGE AND ADMINISTRATION)
Best time to apply and time window	- sponsor has 30 calendar days to respond to FDA - then FDA will proceed within 15 calendar days either by sending a supplement approval letter or ordering the application holder to make the required labeling changes - FDA expects that new approved labeling will be available on the application holder's website within 10 calendar days
Expert tips	The definition of new safety information is broad to enable FDA to require application holders (sponsors) to add information about serious risks to the labeling of a drug New safety information for a SRLC is obtained through clinical trials, adverse event reports, post-approval studies, peer-reviewed biomedical literature, data derived from the post-market risk identification and analysis system, or other scientific data In response to a SRLC request the sponsor may submit a supplement with proposed labeling changes or a rebuttal statement. FDA allows 30 calendar days after sponsor's response for dialogue after which FDA can enforce the labeling change to take effect within 15 days. Application holders may submit labeling supplements for review at any time and without prior notification to FDA. Application holders may continue to submit labeling supplements using standard procedures (See 21 CFR 314.70 and 601.12). Approved updates to labeling are posted on FDA's Website FDA hosts a SRLC database that include safety labeling changes (SLCs) that were required by FDA as well as updates to safety information in the labeling recommended by the FDA or initiated by companies Any questions about the guidance for SRLC, contact Kristen Everett, Center for Drug Evaluation and Research, Food and Drug Administration, 10903 New Hampshire Ave., Building 22, room 6484, Silver Spring, MD 20993.