

Drug Repurposing Guidebook

Building Block I460

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	Data outside the public domain
References	https://www.ema.europa.eu/en/about-us/how-we-work/access-documents https://www.ema.europa.eu/en/documents/regulatory-procedural-guideline/output-european-medicines-agency-policy-access-documents-related-medicinal-products-human-veterinary_en.pdf https://www.fda.gov/regulatory-information/freedom-information https://www.ema.europa.eu/en/human-regulatory/marketing-authorisation/clinical-data-publication https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7318194/
Description	<p>An advantage of drug repurposing is that the medicine under investigation has been studied in previous indication(s). Aside from information in the published literature and from documents provided by regulatory authorities such as assessment reports, EMA Clinical Data Publication, and clinical trials registries, there may be substantial data that is held elsewhere that is not readily available in the public domain but may be requested (including voluntary initiatives for data access by pharmaceutical companies). This BB provides a starting point to investigate and source that data.</p>
Category	Availability of data
Type of BB	Development resource

ITEM	DESCRIPTION
Geographical scope	International
Availability	Different jurisdictions have different rules on the release of information held by public bodies. Some private bodies – notably pharmaceutical companies – may be willing to sharing information following formal requests and have processes to allow external groups to access information
Scope of use	Every repurposing project should run a gap analysis to determine what information might be held by different organisations that could be helpful for the future development programme
Stakeholders involved	Industry, academia, public bodies
Enablers/ Requirements	Helps reduce duplication and replication of experiments / and or clinical studies if relevant data has already been robustly generated elsewhere
Output	Adds to the portfolio of information around the medicine in the claimed indication, providing additional knowledge for shaping the development programme
Best time to apply and time window	Before embarking on any new work such as non-clinical experimentation or clinical trials consider if someone else might have already done it!
Expert tips	Consider all potential sources of information and draw up a strategy for requesting access to information held by different organisations, understand your rights in the different regions, contact individual companies with requests, check whether the provided information is suitable (e.g., quality and date the data was generated) before concluding on its relevance