IMPLEMENTATION OF RISK MINIMIZATION ACTION PLANS

TO SUPPORT QUALITY USE OF PHARMACEUTICALS: OPPORTUNITIES AND CHALLENGES: A PUBLIC WORKSHOP

IMPLEMENTATION OF RISK MINIMIZATION ACTION PLANS

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Conflict of Interest Statement
(see Strom)

IMPLEMENTATION OF RISK MAPS: SUMMARY OF DAY ONE

- > DEFINITIONS
- > QUOTABLE MOMENTS
- > CROSS-CUTTING ISSUES
- > CHALLENGES FOR THIS AFTERNOON'S PANEL

IMPLEMENTATION OF RISK MAPS: SUMMARY OF DAY ONE

- But first ... the exhortation from Jean Slutsky
- > We're here to listen to each other
- Overheard at restaurant last night

- AHRQ: VERY IMPORTANT ISSUES, VERY MINUTE BUDGETS (js)
- ROCKVILLE/GAITHERSBURG: A HIGHLY VOLATILE AREA REQUIRING TIGHT SECURITY (js)
- FDA: ...A 'PUBLIC HEALTH' INSTITUTION (ps)
- FDA: I WON'T USE THE WORD 'REFORM'
- FDA: AN 'HONEST BROKER' TO BRING THE VARYING INTERESTS TOGETHER
- > FDA: MOTIVATED BY THE BEST OF INTENTIONS
- UK: where they pay GPs 150 K
- DISTRIBUTION CENTERS: PART OF THE PROBLEM, ER UM PROGRAM! (ad)
- > STROM'S CONFLICT OF INTEREST: ALSO AN EYE TEST (bs)

- > THE HOLY GRAIL: PERSONALIZED MEDICINE
- > RISKMAPS: A STEP TOWARD THE HOLY GRAIL
- RISKMAPS: MOST OF THE ARE THERE FOR A REASON. THEY'RE ALL DIFFERENT. (sk)
- RISKMAPS: PRESERVE ACCESS TO DRUGS WHICH OTHERWISE WOULD BE LOST
- RISKMAPS: COMPROMISE CONTINUITY OF CARE AND DELAY ACCESS TO MEDS (82% OF HOSPITAL PHARMACISTS)
- RISKMAPS: THE RARE AND HAPPY SITUATION: WHEN WE CAN DO THINGS PROACTIVELY
- THE GOAL OF RISKMAPS: EVERY PATIENT WILL DEMONSTRATE A BASIC UNDERSTANDING OF THE DRUGS THEY'RE ABOUT TO TAKE
- REMS: CONGRESS CATCHING UP ON WHAT FDA WAS ALREADY TRYING TO DO

- > PHYSICIANS: GRADUATES OF THE JEKYL AND FRANKENSTEIN SCHOOL OF MEDICINE
- PHYSICIANS: RISK AVERSE AND AVERSE TO CUMBERSOME PROCEDURES
- PRIMARY CARE PHYSICIANS: A 'READY-TO-COLLAPSE SYSTEM'
- EVIDENCE BASED MEDICINE: TAKES TIME, WHICH IS PRECISELY WHAT I DON'T HAVE!
- WARNING FATIGUE: HOW MANY ARE TOO MANY; STOP THE SEATBELT DEMOS
- > TOUCH: WHAT YOU CAN'T DO WITH THE SLIDES

- CONSUMERS: NOT AN EASY CROWD TO KEEP SAFE
- BIKERS WITHOUT HELMETS: KEEP THE ORGAN BANKS IN BUSINESS
- > I'M THE PATIENT: THE BOTTOM OF THE FOOD CHAIN (NOT!) (...IN THIS WEEK'S NEJM ...)
- > HCDS: FRACTIONATED AND SOMETIMES FRACTIOUS
- DRUGS: AS WITH ANYTHING THERE ARE SOME BENEFITS AND SOME RISKS

RISK MANAGEMENT DILEMMA

> IN THE BALANCE REMEMBER
BENEFITS AND NOT JUST HARMS



- > RISKMAP'S ARE NOT NEW: CLOZAPINE "NO BLOOD, NO DRUG" 1990
- > RISKMAPS ARE NEW: PDUFA III 2002
- > 'THERE IS SOME EVIDENCE THAT THE PROGRAM IS EFFECTIVE ...'
- > THE PLURAL OF ANECDOTE IS NOT DATA
- > THE QUESTION IS ...

Oh, great guru: What is the answer?

My son (er, um, daughter): what is the

question???



- > THE QUESTION IS ...WHAT IS THE QUESTION
- > THE QUESTION IS: HOW, DESPITE THIS DISARRAY, CAN WE IMPROVE PATIENT CARE?
- THE PROBLEM IS: WE HAVE FOCUSED IN THE PAST ON THE TYRANY OF THE AVERAGE

- "YOU do WISH TO RESTRICT PHYSICIAN BEHAVIOR THAT IS IRRATIONAL."
- "RISKMAPS ARE USEFUL IN PROTECTION OF DRUGS, NOT JUST PATIENTS."
- > "THERE IS NO SILVER BULLET HERE."
- "THE PATIENT, ALREADY COMPROMISED, SHOULD NOT BE BURDENED WITH CONFUSING ENROLLMENT PROCESSES."
- "THE DOCTORS I ASKED COULD SEE THE NEED FOR CONTROL, BUT FOUND THE SYSTEM ONEROUS."
- "I'M HERE TO LEARN; I HAVE TO REPORT BACK TO ALL THOSE DOCTORS!"

- "...NOT ON MY WATCH. I DON'T WANT TO GET SUED."
- "WOULD A PILOT SAY: 'A CHECKLIST IS DEGRADING AND INSULTING TO MY PROFESSIONALISM'? AS A CONSUMER IT MAKES ME GRUMPY."
- "HOW CAN WE MAKE IT EASY FOR PHYSICIANS TO DO THE RIGHT THING? ... AND MAKE IT HARDER TO DO THE WRONG THING?"
- "YOU DON'T JUST DO ONE APPROACH. SOME PHYSICIANS WANT A LITTLE CARD IN THE POCKET OF THEIR WHITE COATS."

- YOU REALLY HAVE A HARD TIME BELIEVING EVERYTHING THAT POPS UP IN A POP UP WINDOW.
- > LET'S USE CARROTS NOT JUST STICKS.
- OUR CURRENT FRAGMENTED APPROACH IS NOT GOING TO SUPPORT THE COMING REALITY.
- PROGRAMMERS NEED TO BE PAID, TOO. (SUBSTITUTE YOUR FAVORITE HERE ...!)
- > IT'S NOT JUST WHO IS THE SUBJECT OF A RISKMAP. IT'S WHO IS LEFT OUT.
- IF THE PATIENT DOESN'T GET THE (RISKMAP) PRODUCT AT ALL, YOU'VE STILL GOT A PROBLEM.

- "WHAT WE REALLY NEED ARE FOOL PROOF SYSTEMS."
- "WOULDN'T IT BE NICE IF WE ALL HAD E-PRESCRIBING?"
- "HELP ME TO DO WHAT I AM BUILD RISKMAPS INTO THE WORKFLOW. TRYING TO DO ANYWAY."
- "THERE ARE PROCESSES WE CAN ADAPT AND ADOPT FROM THE DISEASE MANAGEMENT SAFETY MANAGEMENT WORLD."
- "LET'S TAKE RISKMAP DRUGS AND PUT THEM INTO EXISTING SYSTEMS."
- Perhaps the RISKMAPS CAN BE THE driving force BEHIND HEALTH SYSTEM REFORM.

IMPLEMENTATION OF RISK MAPS: CROSS-CUTTING ISSUES

- CONSENSUS: WE APPEAR TO AGREE ON THE OBJECTIVES; BUT NOT YET THE METHODS
- STANDARDIZATION: EACH RISKMAP IS UNIQUE; BUT THE SYSTEMS INTO WHICH THEY ARE INSERTED REQUIRE STANDARD APPROACHES
- TRANSPARENCY: ADOPTION REQUIRES ACCEPTANCE; ACCEPTANCE REQUIRES UNDERSTANDING; BUT THE SECTOR REQUIRES INTELLECTUAL PROPERTY PROTECTION AND HAS YET TO DEVELOP EFFECTIVE COMMUNICATION

IMPLEMENTATION OF RISK MAPS: CROSS-CUTTING ISSUES

- ➤ EMPOWERMENT: MANAGEMENT REQUIRES CONTROL; PROFESSIONALISM REQUIRES FLEXIBILITY. REGULATION IS CENTRAL; IMPLEMENTATION IS LOCAL.
- RESOURCES: SPECIALIZED PROCESSES INCREASE COSTS; THE SECTOR NEEDS COST-CONTAINMENT
- > EVIDENCE: RISK MANAGEMENT IS AN INTERVENTION; INTERVENTIONS ARE THERAPY TOO AND REQUIRE THE SAME ETHICS AND PROOFS.

CHALLENGE TO THE FINAL PANEL: ACTIONABLE STEPS

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IMPLEMENTATION OF RISK MAPS:CHALLENGES FOR TODAY'S PANELS

- > PROMOTE INTERACTION
- > PROMOTE INFORMATION SHARING
- > ENLIST NEW PARTNERS
- > IMPROVE UNDERSTANDING OF THE HCDS PROCESSES
- > DEVELOP ACTIONABLE STEPS