THE UNIVERSITY of NORTH CAROLINA at CHAPEL HILL

111 Criteria for Approval #3

Equitable selection of subjects

Belmont Report & 45 CFR 46.111 & 21 CFR 56.111

1)	Risks minimized	Belmont: Respect for Persons & Beneficence
2)	Favorable risk : benefit ratio	Belmont: Respect for Persons & Beneficence
3)	**Equitable selection of subjects**	**Belmont: Justice**
4)	Informed consent sought	Belmont: Respect for Persons
5)	Informed consent documented	Belmont: Respect for Persons
6)	Monitoring plan for safety	Belmont: Beneficence
7)	Privacy & confidentiality protected	Belmont: Respect for Persons
8)	Additional safeguards for vulnerable populations	Belmont: Respect for Persons, Beneficence & Justice

Justice
Belmont: Distributive Justice

- Distribution of scarce benefits &

- Distribution of burdens

Ethics & Regulation of Clinical Research

Robert J. Levine

§46.111 & §56.111 (3) “Selection of Subjects is Equitable”

- IRB responsibility
  - Purpose of research
  - Research setting
  - Does it include subjects vulnerable to coercion or undue influence?
    - Children
    - Prisoners
    - Impaired decisionmaking capacity
    - Economically or educationally disadvantages

Factors to consider

- Sex of animals & people
- Ethnic Groups
- Genetic factors
- Age differenes
- What is the target population for this drug/device?

Considerations for the IRB

- Appropriate balance of male & female subjects
- Provisions for consent in other languages & staff with those same abilities to answer questions
- Will minors be enrolled? Appropriate?
- Recruitment strategy appropriate & through?

Cost to bring a drug to market

Based on costs of 63 drugs between 2009 & 2018

$985 million:

cost of failed trials

research & design

Sad Fact

- Let's start with a very sobering **fact**: More Americans die from adverse effects of prescription drug medications than from illegal drugs.

Source: **8 FDA Approved Drugs That Were Pulled From The Market - Drugsdb.com http://www.drugsdb.com/blog/fda-approved-drugs-pulled-from-market.html#ixzz6Wvlzoox8**

FDA Classes of Drug Recalls

1. **“Violations of labeling or manufacturing laws**

2. **Those that cause a temporary health problem or pose a slightly serious threat**

3. **Those dangerous or defective products that could cause serious health problems or death.”**

10 dangerous drugs recalled by the FDA
Naveed Saleh, MD, MS
MDLinx July 24, 2019

10 Recalled Drugs

1. Valdecoxib (Bextra)	2001 – 2005	4 Years
2. Pemoline (Cylert)	1975 – 2010	35 years
3. Bromfenac (Duract)	1997 – 1998	1 year
4. Levamisole (Ergamisol)	1989 – 2000	11 years
5. Rofecoxib (Vioxx)	1999 - 2004	5 years
6. Isotretinoin (Accutane)	1982 – 2009	27 years
7. Sibutramine (Meridia)	1997 – 2010	13 years
8. Terfenadine (Seldane)	1985 – 1998	13 years
9. Troglitazone (Rezulin)	1997 – 2000	3 years
10.Efalizumab (Raptiva)	2003 – 2009	6 years

Post approval SAEs

- Heart attacks; heart valve issues; HBP & stroke
- Deaths
- Severe kidney damage
- Stomach & intestine tears
- Stevens-Johnson syndrome
- GI Bleeding,
- Liver damage & transplants
- Suicidal ideation