

# Uncertainty in Benefit-Risk Assessment

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# Problem Statement

To enhance **transparency** and **clarity**, a structured and **evidence-based** approach to **benefit-risk assessment** that characterizes **uncertainties** is desirable

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quality evidence and early access, between benefit and risk, between protecting the US public and encouraging innovation that may improve health outcomes. Given the importance of these tasks, it is essential for FDA to adopt a harmonized framework for medical product approval that consistently accomplishes 3 key goals: (1) applying a core set of scientific, medical, and public health principles; (2) articulating a clear approach for addressing uncertainty and patient viewpoints; and (3) providing a predictable pathway for therapeutic development.

Robert Califf. Benefit-Risk Assessments at the US Food and Drug Administration: Finding the Balance. *JAMA*. 2017; 317:693-694

mean that the benefits outweigh the risks. Reviewers, however, must make this determination based on a tremendous amount of complex data, and must do so in contexts where there is a great deal of uncertainty. This uncertainty can stem from a variety of sources, including the nature of a given drug's benefits and risks, its effectiveness in a real-world population, and its long-term safety. For example, pre-market data are derived from randomized control trials (RCTs), which assess the efficacy of a drug in a highly controlled, narrow population that may not be representative of the wider population that may ultimately use the drug.<sup>1</sup> New information about potential harms or adverse events is gathered post-market, but there is uncertainty over how to reconcile results from observational studies with those from clinical trials.<sup>2</sup>

Advancing Structured Benefit-Risk Assessment in FDA Review  
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Move from Frameworks to **Decisions**

Representativeness:  
RCTS vs post-marketing

Communicate value of generated evidence to various stakeholders

Bayesian toolbox:  
decision theory, predictive distributions, probability, ...

