

Advancing Premarket Safety Analytics

PharmaSUG

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- I have no relevant financial or non-financial relationships to disclose.

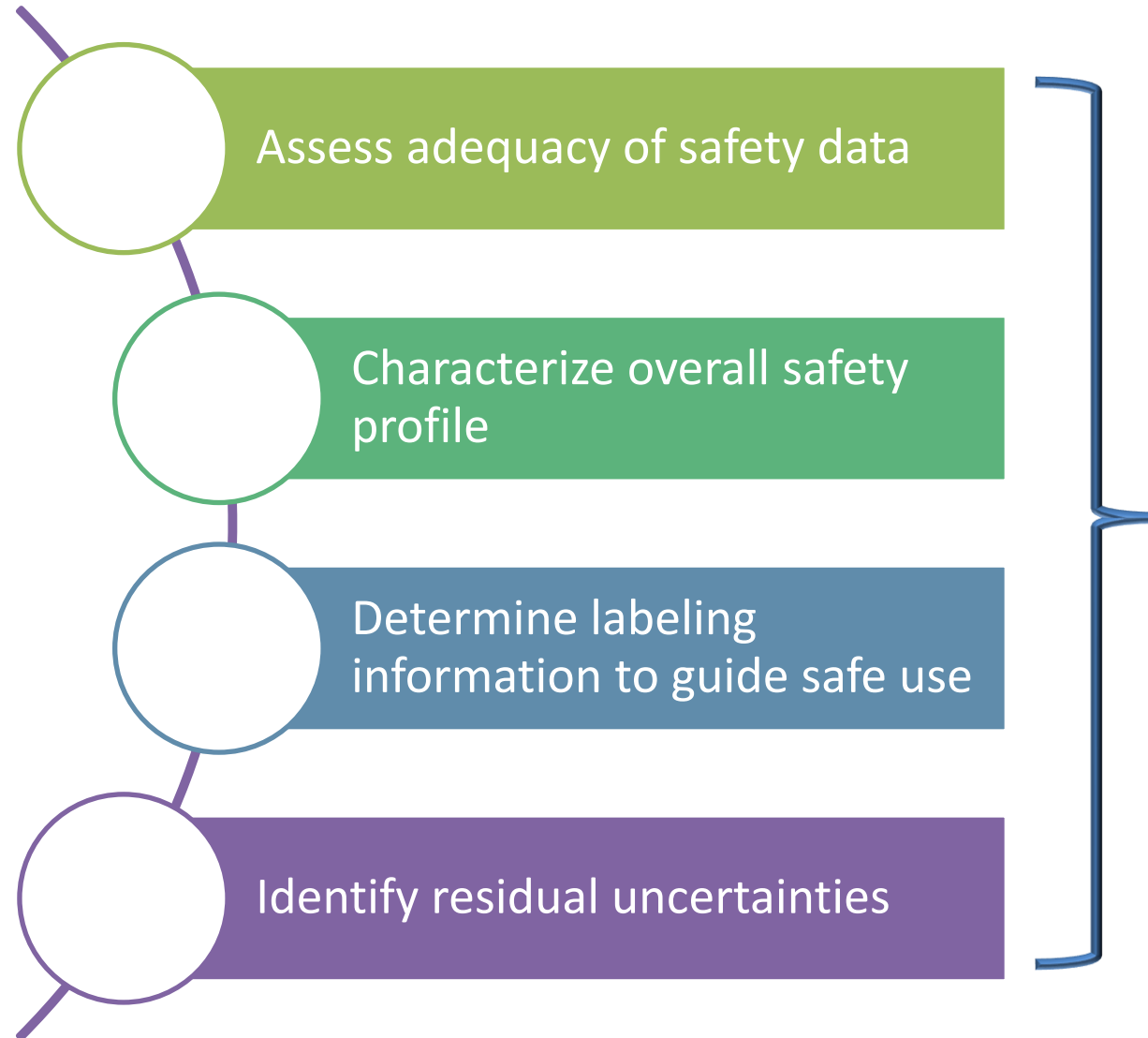
Agenda

Background

FDA Medical Queries (FMQs)

Standard Safety Tables and Figures (STFs)

Goals of FDA Clinical Safety Assessment



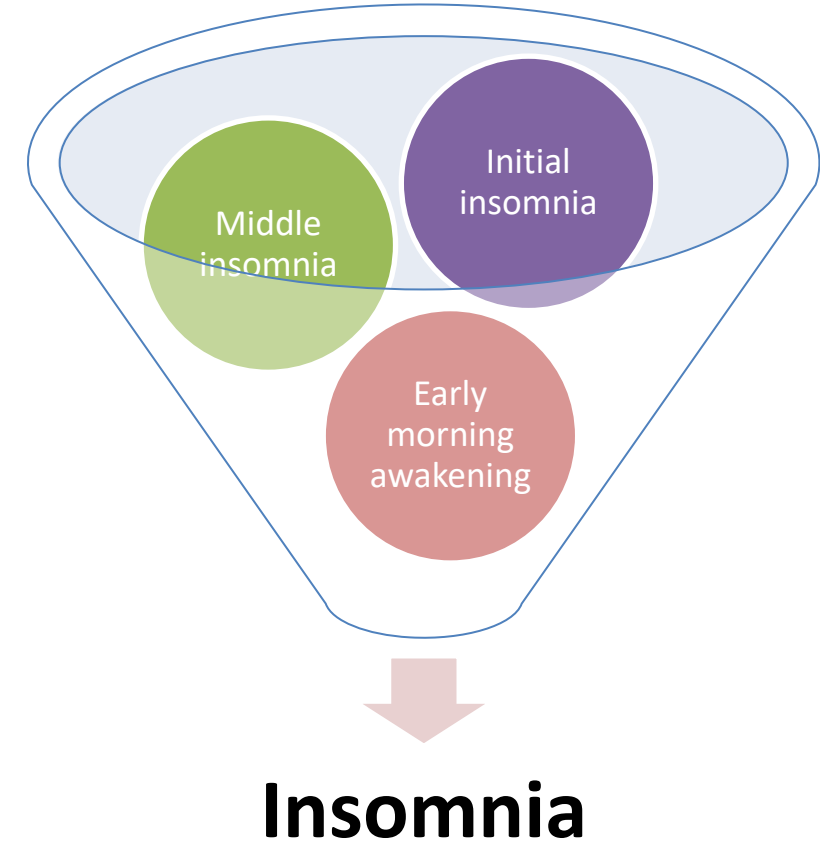
Premarket Safety Analytics

- FMQs
- STFs

FDA Medical Queries (FMQs)

What are FMQs?

- Standardized groupings of related MedDRA¹ PTs developed by FDA review staff
- Each FMQ represents a medical concept



¹ MedDRA = Medical Dictionary for Regulatory Activities

Goals of FMQs



Standardized approach
to grouped AE analysis



Improve safety signal
detection in clinical
trial datasets

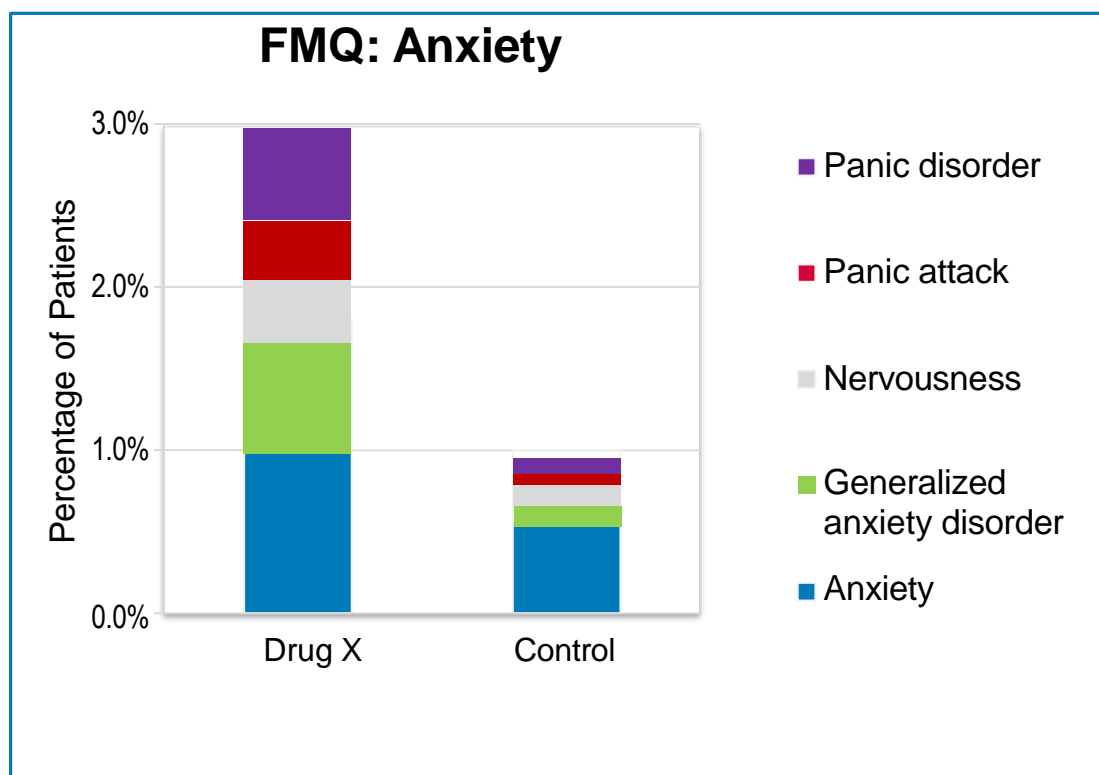
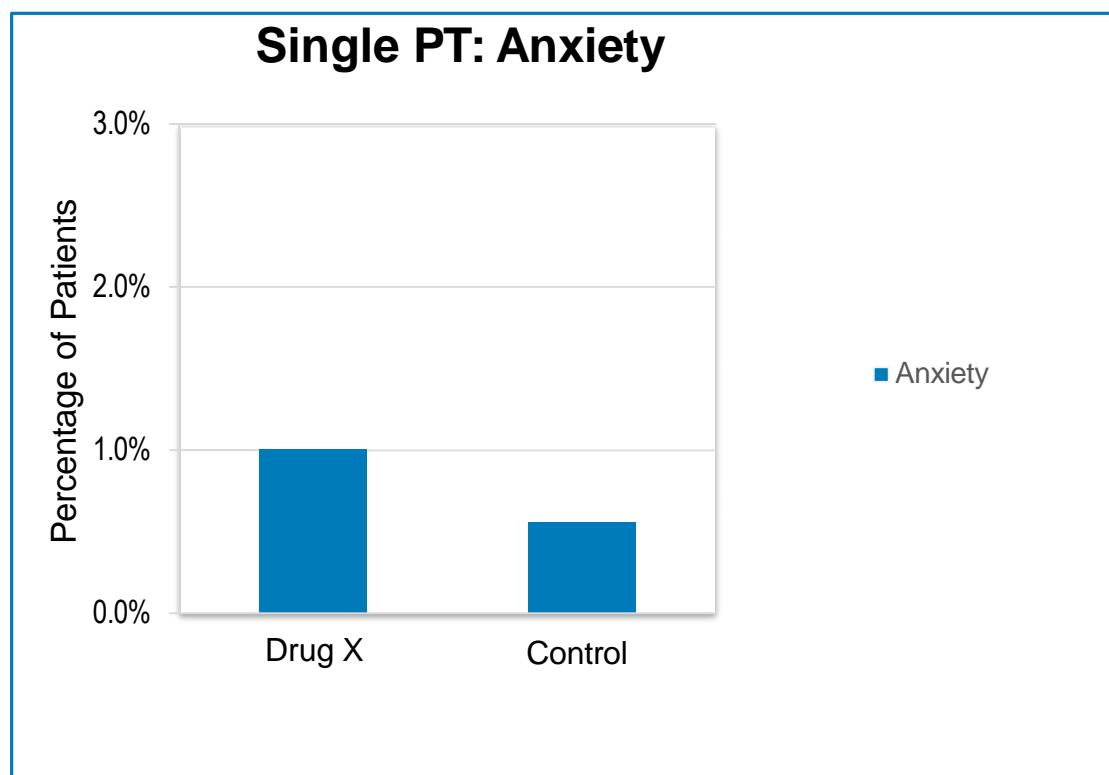
Why FDA Medical Queries?

- Different verbatim terms for similar clinical events
 - Different MedDRA PTs can be used to code for the same medical concept
- Adverse Events (AEs) may manifest in related, but different ways.

Single PT Analysis vs. FMQ



“Anxiety” safety signal may only become apparent when all variations of anxiety are included.



Inconsistent Standards



Related PTs are
not Grouped



Potential
missed safety
signals

FMQ: Narrow vs. Broad Queries

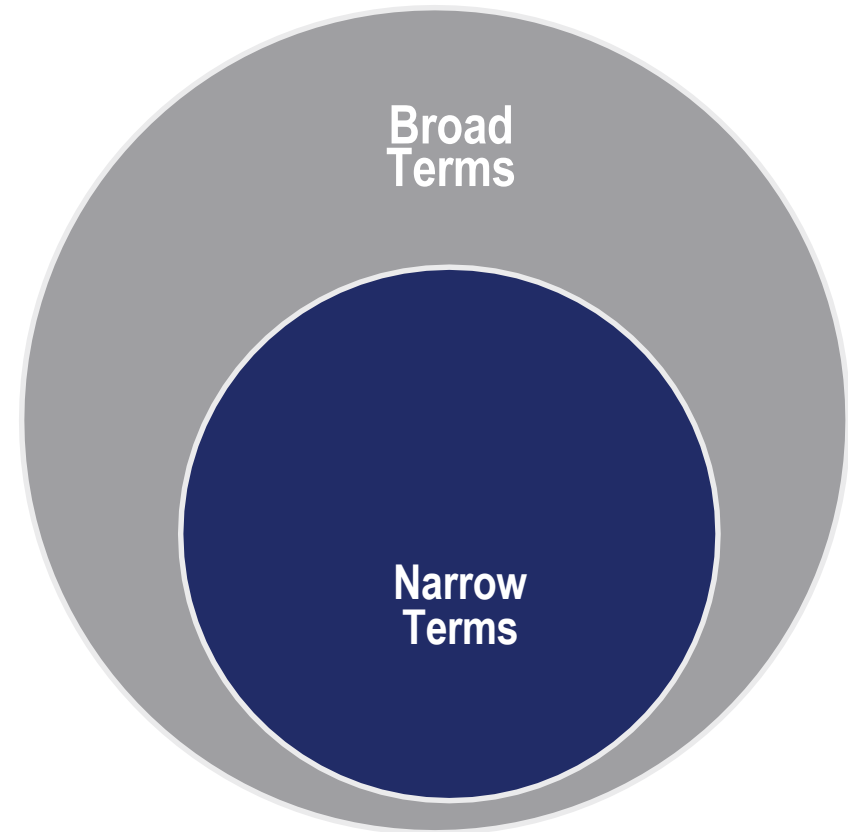


Narrow FMQ terms

- Specific for the medical concept
- > ~90% probability that the medical concept occurred

Broad FMQ terms

- “Cast a wider net” than narrow query terms for signal detection
- Less specific
- Provide reasonable assurance (more than ~30% probability) that the medical concept occurred



FMQ Ground Rules: Narrow Queries

PTs that are near-synonyms of the FMQ concept

- “*Abdominal discomfort*” in FMQ Abdominal Pain

PTs that are subgroups of the FMQ concept

- “*Anaemia neonatal*” in FMQ Anemia

PTs that specify an etiology for the FMQ concept

- “*Uremic Pruritus*” in FMQ Pruritus

PTs that ensure the occurrence of the FMQ concept

- “*Aortic Rupture*” in FMQ Hemorrhage

FMQ Ground Rules: Broad Queries

PTs that may result in the FMQ concept

- *“Osteopenia”* in FMQ Osteoporosis

PTs that provide laboratory, radiologic, or other diagnostic test results reasonably suggestive of an FMQ, including PTs with ambiguous results such as “abnormal”

- *“Blood glucose abnormal”* in FMQ Hyperglycemia

PTs reasonably suggestive of the FMQ concept, but not required by the FMQ concept

- *“Bronchospasm”* in FMQ Hypersensitivity

PTs that indicate a “carrier” status for FMQ concepts that specify an infectious disease

- *“Bacterial disease carrier”* in FMQ Bacterial Infection

FMQ Ground Rules: PT's Excluded from FMQ



PTs that are too vague are excluded from FMQs

- Neither a required component nor reasonably specific for the FMQ concept
 - “*Nausea*” would **not** be included in FMQ Migraine
- Names of laboratory, radiologic, or other diagnostic tests without a result
 - “*Clostridium test*”
 - PTs that provide test names without a result, but would only be performed in the presence of disease, should be included if they otherwise qualify (example: “*Antipsychotic drug level*” in FMQ Psychosis).

FMQs and MedDRA SMQs

FMQs attempt to capture all instances of an AE, even if PT indicates a “non-drug-related” cause:

FMQ Pancreatitis

(Does Contain)



SMQ Acute Pancreatitis

(Does Not Contain)



**Alcoholic Pancreatitis
Autoimmune Pancreatitis
Obstructive Pancreatitis
Pancreatitis Viral**

Algorithmic FMQs

- **Narrow** – contains PTs highly specific to the FMQ concept; indicates that the FMQ occurred.
- **Broad** – casts a wider net to capture additional cases of the FMQ concept.
- **Algorithmic** – uses multiple datasets to leverage more of the available information:
 - Adverse event datasets
 - Laboratory datasets
 - Concomitant meds datasets
 - Medical history datasets
 - Temporal relationships

Example Mock Algorithm:

1. PT + PT
2. Lab value >ULN
3. PT + Con Med within 3 days
4. PT + Medical History

Algorithmic FMQ Example: Drug-Induced Muscle Injury

Patients qualify for the algorithm if they meet any of the following criteria:

1. Any Rhabdomyolysis FMQ Narrow term
2. Urine myoglobin >ULN
3. CPK >5 x ULN **AND NO:**
 - CPK >ULN at baseline OR
 - CPK-MB/CPK >0.05 with start date within 3 days
4. [PT Myalgia + PT Muscular Weakness + (PT Myoglobin Urine Present OR PT Chromaturia)] with start date within 7 days of each other

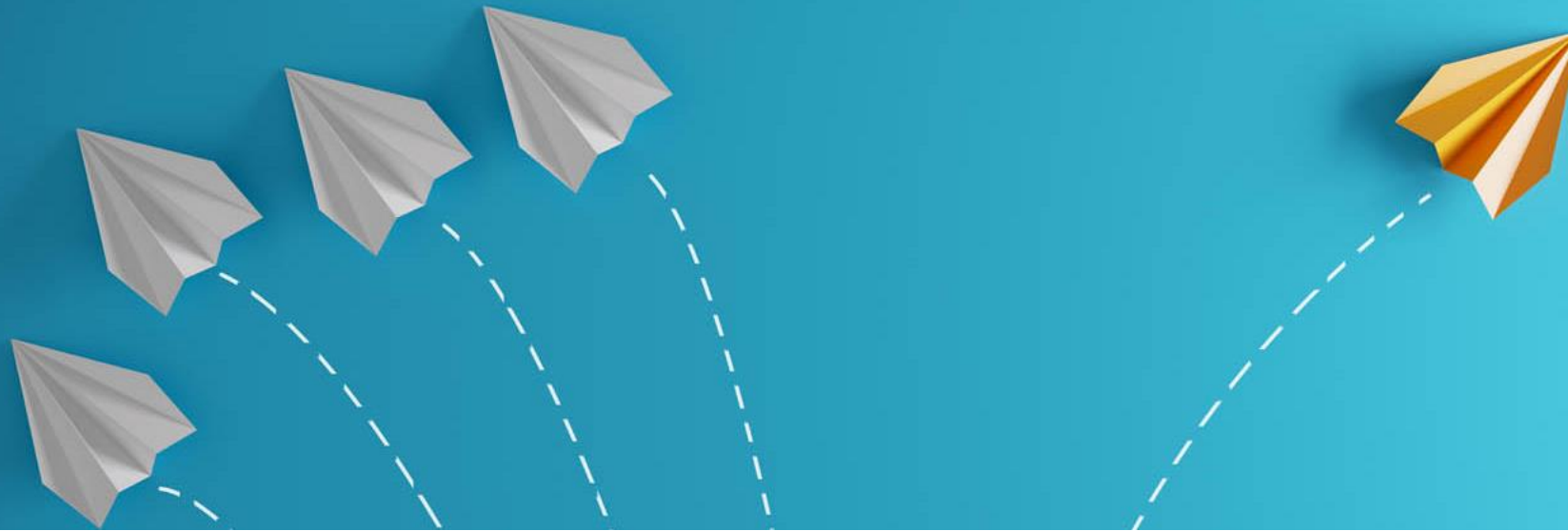
ULN= Upper limit of normal, CPK = creatine phosphokinase

FMQ Version 2.1

- | | | | |
|------------------------------------|----------------------------------|------------------------------------|-------------------------------------|
| 1. Arthritis | 27. Diabetic Ketoacidosis | 53. Hypotension | 79. Pyrexia |
| 2. Abdominal Pain | 28. Diarrhea | 54. Insomnia | 80. Rash |
| 3. Abnormal Uterine Bleeding | 29. Dizziness | 55. Irritability | 81. Renal & Urinary Tract Infection |
| 4. Acute Coronary Syndrome | 30. Dry Mouth | 56. Invest Agent Abuse Potential | 82. Respiratory Depression |
| 5. Acute Kidney Injury | 31. Dysgeusia | 57. Leukopenia | 83. Respiratory Failure |
| 6. Alopecia | 32. Dyspepsia | 58. Lipid Disorder | 84. Rhabdomyolysis |
| 7. Amenorrhea | 33. Dyspnoea | 59. Local Administration Reactions | 85. Seizure |
| 8. Anemia | 34. Erectile Dysfunction | 60. Malignancy | 86. Self-Harm |
| 9. Anaphylactic Reaction | 35. Erythema | 61. Mania | 87. Sexual Dysfunction |
| 10. Angioedema | 36. Excessive Menstrual Bleeding | 62. Myalgia | 88. Somnolence |
| 11. Anxiety | 37. Fall | 63. Myocardial Infarction | 89. Stroke-TIA |
| 12. Arrhythmia | 38. Fatigue | 64. Myocardial Ischemia | 90. Syncope |
| 13. Arthralgia | 39. Fracture | 65. Nasopharyngitis | 91. Systemic Hypertension |
| 14. Back Pain | 40. Fungal Infection | 66. Nausea | 92. Tachycardia |
| 15. Bacterial Infection | 41. Glaucoma | 67. Opportunistic Infection | 93. Tendinopathy |
| 16. Bacterial Vaginosis | 42. Gout | 68. Osteoporosis | 94. Thrombocytopenia |
| 17. Bronchospasm | 43. Gynaecomastia | 69. Palpitations | 95. Thrombosis |
| 18. Cachexia | 44. Hemorrhage | 70. Pancreatitis | 96. Thrombosis (Arterial) |
| 19. Cardiac Conduction Disturbance | 45. Headache | 71. Paraesthesia | 97. Thrombosis (Venous) |
| 20. Cholecystitis | 46. Heart Failure | 72. Parasomnia | 98. Tremor |
| 21. Confusional State | 47. Hepatic Failure | 73. Peripheral Oedema | 99. Urinary Retention |
| 22. Constipation | 48. Hepatic Injury | 74. Pneumonia | 100. Urticaria |
| 23. Cough | 49. Hyperglycemia | 75. Pneumonitis | 101. Vertigo |
| 24. Decreased Appetite | 50. Hyperprolactinaemia | 76. Pruritus | 102. Viral Infection |
| 25. Decreased Menstrual Bleeding | 51. Hypersensitivity | 77. Psychosis | 103. Volume Depletion |
| 26. Depression | 52. Hypoglycemia | 78. Purulent Material | 104. Vomiting |

Standard Safety Tables & Figures (ST & F)

Why Standard Tables & Figures?



- Standardize safety signal evaluation across divisions
- Uniform safety data presentation and visualization (e.g., color, table layout)
- Follow formatting standards used in major medical journals
- Save reviewer time

Standard Safety Tables & Figures Organization



Integrated Guide

General

Adverse Event
Analyses

Subgroup
Analyses by
Baseline

Laboratory
Analyses

Vital Signs
Analyses

Expanded
Tables and
Figures

Optional
Tables and
Figures

Follow-On Guides

Drug-induced
Kidney Injury

Drug-induced
Liver Injury

Hypersensitivity

Dysglycemia

Drug-induced
Muscle Injury

Standard Safety Tables & Figures

Integrated Guide (ST&F IG): Components



Integrated Guide

General	Adverse Event Analyses	Subgroup Analyses	Laboratory Analyses	Vital Signs Analyses	Expanded Tables and Figures	Optional Tables and Figures
<ul style="list-style-type: none"> Clinical Trials Summary Demographic and Clinical Characteristics Patient Disposition Duration of Exposure 	<ul style="list-style-type: none"> Overview of Adverse Events Deaths Serious Adverse Events Adverse Events Leading to Discontinuation FDA Medical Queries (FMQs) 	<ul style="list-style-type: none"> Overview of certain AEs or SAEs across demographic characteristics 	<ul style="list-style-type: none"> Analyses of Central Tendency Analyses of Abnormalities and Outliers DILI Screening subsection: <ul style="list-style-type: none"> Missing Data Analysis Potential Hy's Law Screening Plot 	<ul style="list-style-type: none"> VS distribution by Treatment Group Baseline vs. Max/Min by Treatment Group Blood Pressure Post-Baseline Data 	<ul style="list-style-type: none"> Expanded AE Analyses <ul style="list-style-type: none"> SAEs TEAEs Expanded Laboratory Analyses <ul style="list-style-type: none"> Change Over Time Outlier Criteria Last Value on Treatment 	<ul style="list-style-type: none"> Optional AE Analyses <ul style="list-style-type: none"> Exposure-Adjusted Analyses Relatedness Analyses Additional FMQ Tables Optional Laboratory and Vital Signs Analyses <ul style="list-style-type: none"> Median and Interquartile Range Plots

Standardization of Data Presentation: Tables

Table 6. Overview of Adverse Events¹, Safety Population, Pooled Analyses²

	Drug Name Dosage X N=XXX	Drug Name Dosage Y N=XXX	Active Control N=XXX	Placebo N=XXX	Risk Difference (%) (95% CI) ³
Event	n (%)	n (%)	n (%)	n (%)	
SAE	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs with fatal outcome	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Life-threatening SAEs	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs requiring hospitalization	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs resulting in substantial disruption of normal life functions	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Congenital anomaly or birth defect	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to permanent discontinuation of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to dose modification of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to interruption of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to reduction of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to dose delay of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Any AE⁴	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Severe	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Moderate	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Mild	n (%)	n (%)	n (%)	n (%)	X (Y, Z)

Note the order of the treatment columns: drug arms followed by active control, and placebo

Subtext is indented

Footnotes provide important definitions and context

Bolded column headers

10 pt. Arial font for all table text (including headers)

Only horizontal borders in the table for easier side by side comparisons

Source: [include Applicant source, datasets and/or software tools used

¹ Treatment-emergent AE defined as [definition]. MedDRA version X.

is shown between [treatment arms] (e.g., difference is shown between Drug Name dosage X vs. placebo).

⁴ Se² Duration = [e.g., X-week double-blind treatment period or, median and a range indicating pooled trial durations].

³ Difference verity as assessed by the investigator

Abbreviations: AE, adverse event; CI, confidence interval; N, number of patients in treatment arm; n, number of patients with at least one event; SAE, serious adverse event

Standardization of Data Presentation: Figures

To ensure standardization, all generated figures follow the below formatting principles.

Figure X. Mean Laboratory (Chemistry) Data Change from Baseline Over Time by Treatment Arm, Safety Population, Trial X



Adverse Event Analyses

- Provides analysis of AEs including:
 - Serious AEs (SAEs)
 - AEs leading to discontinuation
 - FDA Medical Queries (FMQs)
 - AEs of special interest (AESIs)
- All AE tables and figures present treatment-emergent adverse events (TEAEs) as a default



Serious Adverse Events - FMQs

Adverse Event Tables also include FDA Medical Queries (FMQs) arranged by System Organ Class (SOC). FMQs are standardized groupings of adverse event terms developed by FDA reviewers.

Table 10. Patients with Serious Adverse Events¹ by SOC and FDA Medical Query (Narrow), Safety Population, Pooled Analyses²

System Organ Class ⁴ FMQ (Narrow)	Drug Name Dosage X N=XXX n (%)	Drug Name Dosage Y N=XXX n (%)	Active Control N=XXX n (%)	Placebo N=XXX n (%)	Risk Difference (%) (95% CI) ³
SOC1					
FMQ1	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
FMQ2	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SOC2					
FMQ3	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
FMQ4	n (%)	n (%)	n (%)	n (%)	X (Y, Z)

Tables are arranged by SOC, and within the SOC if there are multiple FMQs, FMQs are ordered by decreasing RD.

Overview of Adverse Events



Table 6. Overview of Adverse Events¹, Safety Population, Pooled Analyses²

SAE determination includes all AEs that met individual SAE criteria

Event	Drug Name Dosage X N=XXX n (%)	Drug Name Dosage Y N=XXX n (%)	Active Control N=XXX n (%)	Placebo N=XXX n (%)	Risk Difference (%) (95% CI) ³
SAE	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs with fatal outcome	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Life-threatening SAEs	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs requiring hospitalization	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
SAEs resulting in substantial disruption of normal life functions	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Congenital anomaly or birth defect	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to permanent discontinuation of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to dose modification of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to interruption of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to reduction of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
AE leading to dose delay of study drug	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Other	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Any AE⁴	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Severe	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Moderate	n (%)	n (%)	n (%)	n (%)	X (Y, Z)
Mild	n (%)	n (%)	n (%)	n (%)	X (Y, Z)

TEAE definition and MedDRA version is also included in footnotes.

Source: [include Applicant source, datasets and/or software tools used]

¹ Treatment-emergent AE defined as [definition]. MedDRA version X.

² Duration = [e.g., X-week double-blind treatment period or, median and a range indicating pooled trial durations].

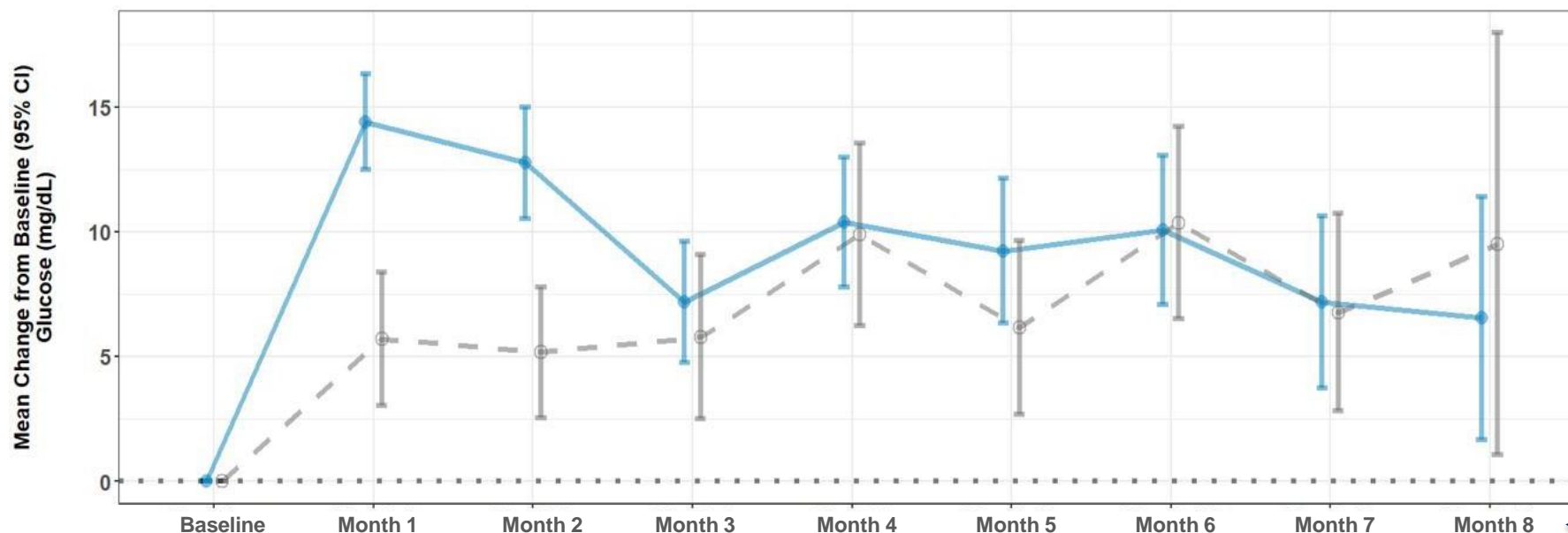
³ Difference is shown between [treatment arms] (e.g., difference is shown between Drug Name dosage X vs. placebo). ⁴ Severity as assessed by the investigator

Standard Laboratory Analyses

- Provides an analysis of routine laboratory parameters including:
 - Missing data analyses
 - Measures of central tendency
 - Outlier analyses
- Additional analyses can be found in the Standard Expanded Safety Tables and Figures section (Expanded Section)
 - Specific outlier criteria and analyses
 - Last value on-treatment analyses
 - Alternate tabulations and visualizations

Laboratory Analyses Over Time

Figure X. Mean Laboratory (Chemistry) Data Change from Baseline Over Time by Treatment Arm, Safety Population, Trial X



X-axis shows scheduled visits per protocol

Mean Change from Baseline / Mean Value

Treatment	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z
Placebo	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z	Y/Z

Mean change from baseline and mean value

Number of Patients with Data

Treatment	XX	XX	XX	XX	XX	XX	XX	XX
Placebo	XX	XX	XX	XX	XX	XX	XX	XX

Figure truncated when less than 5-10% of subjects with data remain in trial

● Treatment ○ Placebo

Laboratory Analyses Over Time – Expanded Section

Table 45. Mean Change From Baseline for General Chemistry Data Over Time by Treatment Arm, Safety Population, Pooled Analysis (or Trial X)

Parameter	Study Visit time ¹ (Study Day/Week/Month)	Treatment Arm (N = X)			Control Arm (N = X)			Difference in Mean Change (95% CI) ²
		n (%) at Visit	Mean (95% CI)	Mean Change From Baseline (95% CI)	n (%) at Visit	Mean (95% CI)	Mean Change From Baseline (95% CI)	
Sodium (mEq/L)	Baseline	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
	Week X	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
	Week Y	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
Potassium (mEq/L)	Baseline	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
	Week X	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)
	Week Y	n (%)	X (Y,Z)	X (Y,Z)	n (%)	X (Y,Z)	X (Y,Z)	X (Y,Z)

ST&F IG vs. Follow-On Guides (FOGs)

Follow-On Guides

- Available by request
- Therapeutic area-specific tables and figures
- More in-depth analyses

ST&F Integrated Guide



Follow-On Guides

DILI

Kidney Injury

Hypersensitivity

Drug-Induced Muscle
Injury

Dysglycemia

Standard Safety Tables & Figures

Follow-On Guide: Components

Follow-On Guide

1.0 - Introduction

Background on ST&F

2.0 - Screening Analyses

Tables and figures from the Integrated Guide

3.0 - Follow-On Analyses

Further explore therapeutic area of interest

4.0 - Appendix

Supplemental information

Standard Tables & Figures: DILI Follow-on Guide



For each section, an explanation of what is contained and Reviewer instructions to inform clinical interpretation of the outputs are provided.

Integrated Guide

DILI Screening Analyses

1. Missing Data
2. Hepatocellular DILI Case Screening Plot
3. Cholestatic DILI Case Screening Plot
4. Comparison of Treatment with Maximal Treatment

DILI Guide

DILI Screening Analyses

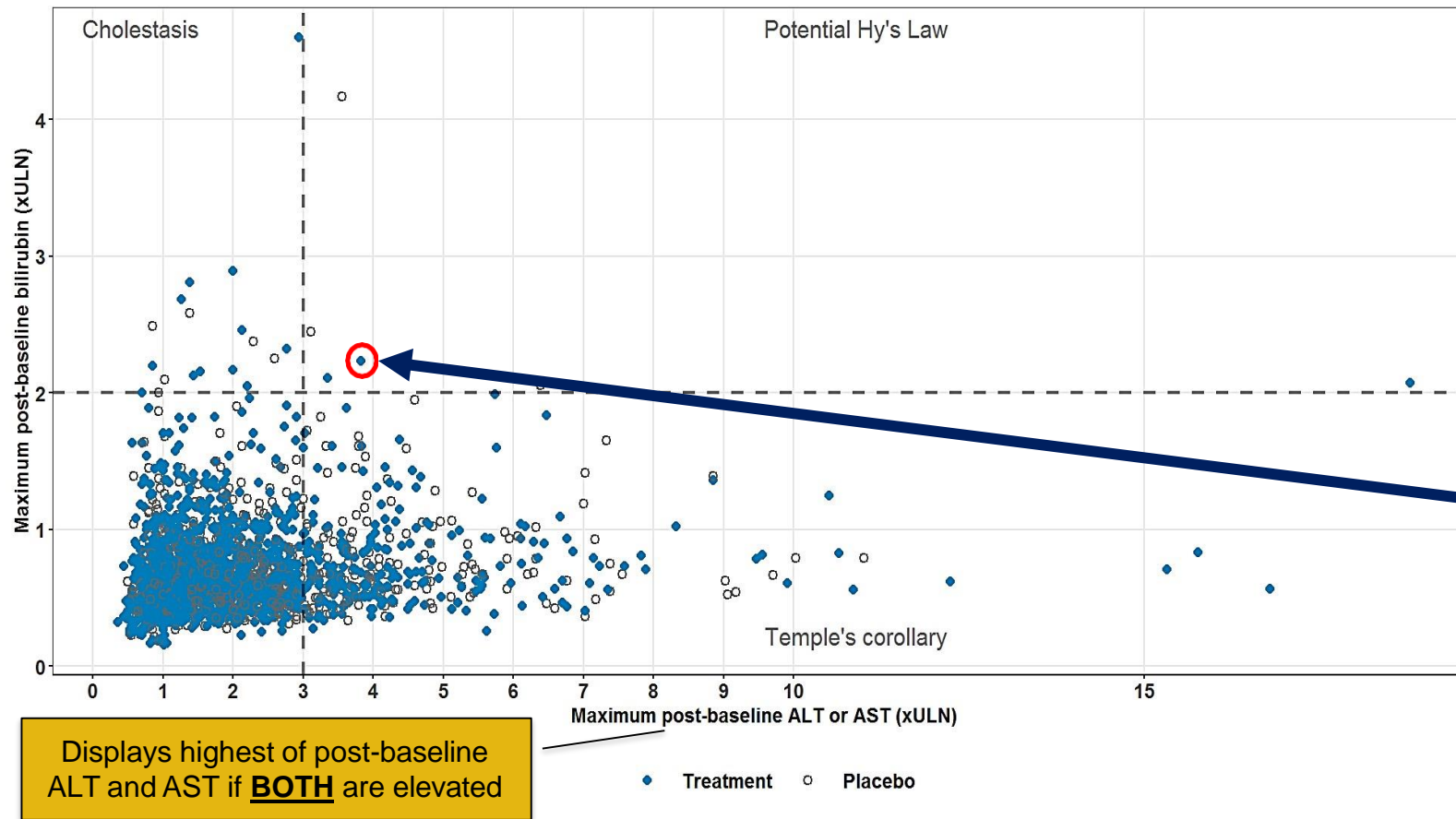
DILI Follow-On Guide*

1. Analyses of hepatic AEs and early discontinuation between arms.
2. Analyses of liver biochemistry studies between arms.
3. Patient level analyses to determine true DILI from other etiologies.

Hepatocellular DILI Case Screening Plot

Note: Default cut-offs are $TB \geq 2xULN$ and ALT or $AST \geq 3xULN$

Figure 12. Hepatocellular Drug-Induced Liver Injury Screening Plot, Safety Population, Pooled Analyses



Each data point represents a patient plotted by their maximum ALT or AST versus their maximum TB values in the postbaseline period.

Red circle indicates this patient meets default criteria:

Any post-baseline $TB \geq 2xULN$ within 30 days after a post-baseline ALT or AST $\geq 3xULN$

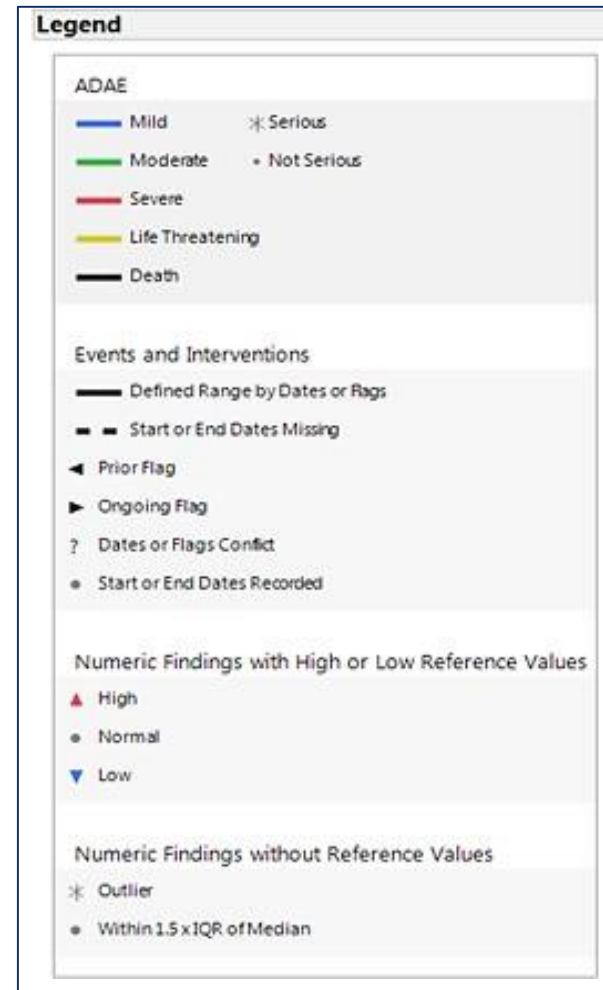
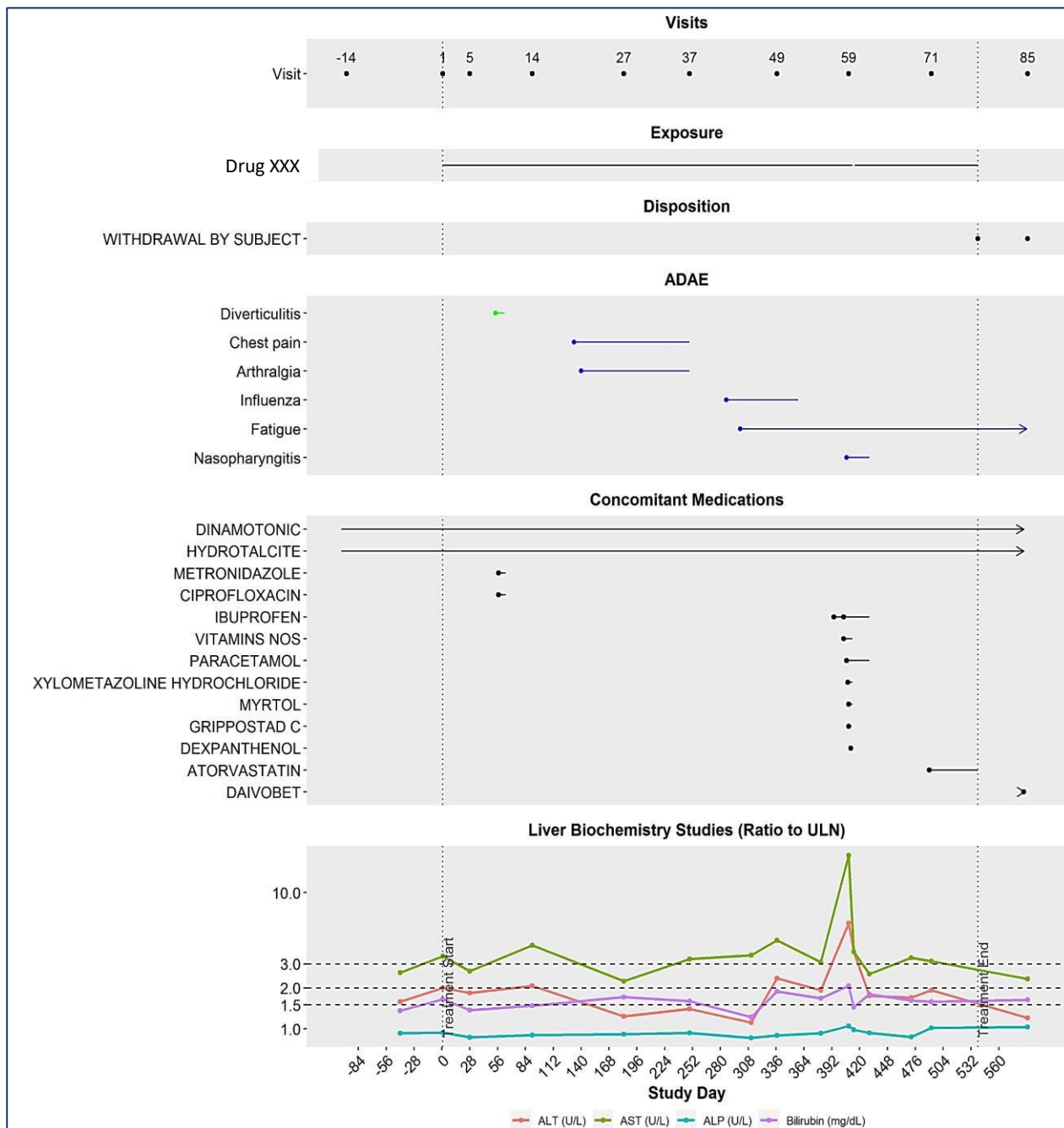
DILI FOG Example Analysis: Liver Biochemistry Elevations Between Arms

Frequency of Hepatic Safety Laboratory Parameter Elevations at any Post-Baseline Visit, by Treatment Arm

Laboratory Abnormality	Active N=X n (%)	Comparator N=X n (%)	Risk Difference (95% CI) ¹
ALT			
≥ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
≥10x ULN	n (%)	n (%)	X (Y, Z)
≥20x ULN	n (%)	n (%)	X (Y, Z)
AST			
≥ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
≥10x ULN	n (%)	n (%)	X (Y, Z)
≥20x ULN	n (%)	n (%)	X (Y, Z)
Alkaline Phosphatase			
≥2x ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
Total Bilirubin			
≥2x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
≥8x ULN	n (%)	n (%)	X (Y, Z)
Direct Bilirubin			
≥2x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)
GGT			
≥2x ULN			
INR			
≥1.5x ULN	n (%)	n (%)	X (Y, Z)
≥3x ULN	n (%)	n (%)	X (Y, Z)
≥5x ULN	n (%)	n (%)	X (Y, Z)

Source: [include Applicant source and/or Software tools used].
Note: The frequency represented here are based on peak levels. Appropriate cut-off for liver biochemistries should be adjusted based on the study population (e.g., pediatric population, those with underlying liver disease etc.). For patients with chronic liver disease, cut-of should be established using multiples of baseline (e.g. 2x, 3x, 5x).
¹Difference is shown between [treatment arms]. (E.g, Difference is shown between Drug Name Dosage X vs. Placebo)
Abbreviations: ALP, alkaline phosphatase; ALT, alanine aminotransferase; AST, aspartate aminotransferase; CI, confidence interval; GGT, Gamma-glutamyl transferase; INR, prothrombin international normalized ratio; ULN, upper level of normal; N, number of patients in group; n, number of patients meeting criteria

DILI FOG: Example Graphical Patient Profile



Concluding Remarks

—

Standard Safety Tables and Figures and FMQs

- Aid FDA clinical review staff in safety signal detection
 - Provide standard approach to categorize and group adverse events
 - Provide standard approach to safety data analysis and visualization
- Foster consistency in data visualizations and to improve efficiency

Acknowledgements: Core Workgroup Members*

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- Kim Shimy
- Larissa Stabinski
- Mahtab Niyyati
- Mat Soukup
- Matthew Guerra
- McKinley DeAngelo
- Michelle Carey
- Nhi Beasley
- Paul Hayashi
- Preeti Venkataraman
- Qunshu Zhang
- Ramya Gopinath
- Rhonda Hearn-Stewart
- Rituparna Moitra
- Robert Temple
- Sarah Connelly
- Sarah Rodgers
- Sarita Boyd
- Scott Proestel
- Susan Duke
- Terrence Autry
- Yang Veronica Pei

