U.S. FOOD & DRUG ADMINISTRATION

GENERAL ADVICE

November 13, 2024

Harvard Medical School
Attention: Ted J. Kaptchuk, Ph.D.
Director, Program in Placebo Studies & Therapeutic Encounter
330 Brookline Avenue
Boston, MA 02215

Dear Dr. Kaptchuk:

Please refer to your September 4, 2024, e-mail to Dr. Jacqueline Corrigan-Curay, Principal Deputy Center Director, Center for Drug Evaluation and Research (CDER) requesting information related to the potential need for an Investigational New Drug (IND) application for future studies intended to compare an open-label placebo plus standard of care versus standard of care alone in patients with either cancer-related fatigue or irritable bowel syndrome.

Based on the high-level summaries you have provided, FDA recognizes that the activity of providing a placebo to a patient may be associated with changes in patient outcome, and that behavioral interventions that include inert pills may have a potential role in helping patients with pain management and other subjectively reported outcomes. We note that you have previously acknowledged to us, in reference to other investigations that you have conducted, that it is not the inert pill, by itself, that is intended to have an effect, but it is employed as part of a multi-modal behavioral intervention consisting of an inert microcrystalline pill, a protocol provided by the prescribing physician that includes explaining to the patient that the pill is inert, an informational video for the patient, and an optional daily reminder system for the patient.

Regarding potentially applicable IND requirements, we do not believe FDA review is warranted in such circumstances, provided that your future studies are similarly situated (recognizing that the precise components of the behavioral intervention may vary based on the study and on your accumulating experience and knowledge). Accordingly, FDA does not intend to apply such requirements, including reporting requirements, under these circumstances.

If you have any further questions, please feel free to contact me at james.p.smith@fda.hhs.gov.

Sincerely,

James P. Smith -S

Digitally signed by James P. Smith -S
Date: 2024.11.13 13:25:24 -05'00'

James P. Smith, MD, MS
Director
Office of New Drug Policy
Office of New Drugs
Center for Drug Evaluation and Research