

1 **Learning the effects of psychotropic drugs during pregnancy using real-world safety data:**
2 **a paradigm shift toward modern pharmacovigilance**

3

4 **Introduction**

5 Perinatal psychiatric disorders occur in one out of five women, and among these, a substantial
6 number may require treatment with psychotropic drugs, even during pregnancy [1]. Gestational
7 use of these drugs has been on the rise in the last decades. For instance, the prevalence of
8 antidepressant use increased from 1% in the nineties, to a current 3% in Europe and 8% in the
9 USA [2, 3]. Hence, addressing the safety profile of psychotropics in pregnancy has become an
10 important public health concern.

11 Pharmacotherapy with psychotropic drugs during pregnancy involves weighing the possible risk
12 of foetal exposure to the drug against the potential adverse effects of sub-optimally treated
13 maternal psychiatric illness to both the mother and child. To guide such decisions, it is critical to
14 provide sound data about psychotropic drug safety in pregnancy and to appraise the collective
15 body of evidence. However, benefits cannot be weighed against risks before reliable information
16 on safety for both immediate perinatal (e.g., congenital anomaly) and long-term (e.g.
17 neurodevelopmental) outcomes in the offspring are available.

18 In this commentary, we discuss the value of real-world drug safety data in pregnancy, i.e. data
19 not collected in conventional randomised controlled trials [4] but rather via observational,
20 pharmacoepidemiological investigations. We also address the methodological advances and
21 challenges linked to use of these data, with focus on psychotropic drugs. Finally, we consider the

22 translation of this safety information into clinical guidance, as a shift toward a “modern”
23 pregnancy pharmacovigilance.

24 **The importance of pharmacoepidemiological pregnancy studies**

25 Until now results from reproductive in vivo and in vitro toxicity testing, coupled to human case-
26 reports and series, and observational post-marketing studies, have aided our understanding of the
27 potential risks posed by psychotropic drug exposure in pregnancy. Yet, we are now witnessing a
28 major transition in the way pharmacoepidemiological pregnancy studies are valued as a
29 methodological key to provide real-world evidence on drug safety in pregnancy. Not least, the
30 recent utilization of data from observational studies by the health authorities has also set the
31 basis for an important paradigm shift, which is providing meaningful clinical information about
32 human drug exposure during pregnancy to women and their doctors [5].

33 **Benefits and challenges of real-world data**

34 In the last two decades there has been an important, rapid escalation of published data on human
35 foetal safety following in utero exposure to psychotropic drugs. Most studies have explored risks
36 of immediate perinatal outcomes such as congenital anomalies, foetal death, and poor neonatal
37 adaptation [6], however the research focus has recently shifted toward various longer-term
38 developmental outcomes in the offspring, such as cognition, neuromotor and behavioural effects,
39 attention-deficit hyperactive disorder, and autism spectrum disorder.

40 The accumulating, growing evidence on psychotropic drug safety in pregnancy has been possible
41 thanks to the increasing availability of real-world data. These include, among others, pregnancy
42 cohort studies and registries, research consortia, health registries, administrative databases and

43 direct-to-patient research initiatives [7]. Use of real-world data is a key to establish psychotropic
44 drug effects on foetal, child, and maternal health. At the same time, the observational nature of
45 real-world data entails inherent limitations and pitfalls, i.e. confounding, bias, and chance, that
46 need to be dealt with.

47 Assignment of a psychotropic drug in pregnancy is neither random nor blinded, and so women
48 taking these drugs differ from non-users in a variety of ways which are often difficult to control
49 for and/or hard to measure (e.g., psychiatric disease severity, illicit substance use), or that remain
50 completely unmeasured (e.g., genetic susceptibility, familial environment). However, we are at a
51 crucial moment where ‘measured’ confounding can be limited in pregnancy studies by the
52 application of novel statistical methods (e.g., propensity scores) [8]. Use of augmented real-
53 world data can also help us to limit the bias due to exposure or outcome misclassification, e.g. by
54 ascertaining psychotropic drug exposure in pregnancy via multiple sources. Direct-to-patient
55 studies can provide valuable, granular data on women’s mental health, behaviours and drug
56 exposures at multiple time points during gestation, which are often lacking in registry-based and
57 administrative data studies [7]. Although real-world data are observational by definition, the
58 design of a hypothetical randomized clinical trial can still be conceptualized [9]. This strategy
59 can allow fairer comparisons between those women exposed to psychotropic drugs in pregnancy
60 and those who are not, and thus reduce, at least to some extent, differences in severity of the
61 underlying psychiatric disease. All these strategies, coupled to methods to address the impact of
62 ‘unmeasured’ confounding (e.g., sibling-designs) [8] can enable us to get closer to the ‘true’
63 psychotropic drug effects on maternal and child health. To reach this goal, though, we are often
64 in need of large multinational registry data, which beyond offering the statistical power to apply

65 sibling-designs provide the additional benefit to explore the safety of individual psychotropics
66 during pregnancy [10].

67 Generally, association does not imply causation, but real-world data on psychotropic drug safety
68 in pregnancy can be informative after a critical appraisal of the available evidence has been done.
69 Important factors include, among others: the strength and direction of the association exposure-
70 outcome and its replication across studies; the specificity of the association; the temporal and
71 dose-response relationships; and not least biological plausibility. Appraising the prevalence of
72 both the psychotropic drug and the outcomes of interest, remains crucial from a public health
73 perspective. For instance, even the large relative increase in the risk of persistent pulmonary
74 hypertension of the newborn associated with prenatal antidepressant exposure, would translate,
75 clinically, into a small absolute risk [10].

76 **Modern pregnancy pharmacovigilance?**

77 Several activities are parts of the puzzle for a modern pregnancy pharmacovigilance, i.e. a
78 pharmacovigilance system that makes real-world data a larger part of the regulatory decision-
79 making process. The EUROmediCAT consortium in Europe, for instance, can provide important
80 insights into potential safety signals in pregnancy in the early post-marketing stage [11]. The
81 initiatives by the European Teratology Information Services [12] have, among others, the ability
82 to collect observational pregnancy data on rare drug exposures with insufficiently documented
83 safety information, e.g., antipsychotics. High standard, high quality, and high transparency post-
84 authorization, pharmacoepidemiological pregnancy studies, are additional core factors to
85 strengthen, as recently advocated in Europe in relation to the detrimental developmental effects
86 of antiepileptic drugs in pregnancy on the offspring [5, 13].

87 Indeed, the reproductive safety of sodium valproate, an antiepileptic drug also used for treatment
88 of bipolar disorders, was recently assessed by the Pharmacovigilance Risk Assessment
89 Committee within the European Medicine Agency (EMA) [14]. Sodium valproate was also just
90 banned by the French National Agency for the Safety of Medicines and Health Products for use
91 by pregnant and childbearing-age women, specifically those with bipolar disorders [15]. This
92 measure was undertaken in light of the now substantial evidence about the detrimental effects of
93 prenatal sodium valproate in pregnancy on child health, in terms of both congenital anomalies
94 and neurodevelopmental delays [16, 17]. Nevertheless, while alternative treatments may be
95 available to women with bipolar disorders, this is often not the case for epilepsy, remarking the
96 importance of the maternal underlying disorder when assessing the benefit-risk ratio of drugs in
97 pregnancy.

98 Modern pregnancy pharmacovigilance also entails conveying real-world evidence in a regulatory
99 actionable and clinically meaningful way, i.e. integrate these data into drug labelling. The latter
100 point is indeed of importance, and advances have been made in both Europe and the USA in
101 recent years. In the USA, removal of the pregnancy risk category letter system in favor of a
102 narrative structure, which includes real-world safety information about dosing and fetal risks
103 [18], has represented a crucial step forward. In Europe, the “*Guideline on risk assessment of*
104 *medicinal products on human reproduction and lactation: from data to labelling*” [19] by the
105 EMA has also supported the need to update the recommendations for use during pregnancy and
106 lactation in light of the increasing human experience in exposed pregnancies.

107 However, the potential risks posed by a sub-optimally medicated maternal illness during
108 pregnancy on child and maternal health are insufficiently conveyed, as this information is not
109 part of the drug labelling. Therefore, the question remains as to how pregnant women with

110 psychiatric disorders, for instance, can be empowered to take informed clinical decisions about
111 the benefits and potential risks of psychotropic drug use during pregnancy.

112 Despite all the advances, modern pregnancy pharmacovigilance activities should also endorse
113 involvement of pregnant and childbearing-aged women in research, as well as in public hearings,
114 as recently done by the EMA in relation to valproate use in pregnancy [20]. Efforts should be
115 made to enhance use of patient-generated health data in pharmacoepidemiological pregnancy
116 studies and direct-to-patient research approaches, and to re-think the way psychotropic drug
117 exposure in pregnancy has so far been defined and studied. Indeed, it is crucial to understand
118 how different patterns of psychotropic drug exposure throughout pregnancy, based on intensity
119 and duration of drug use, may negatively impact maternal and child health. Likewise, estimating
120 direct drugs effects, i.e. effects that go beyond those posed by intermediate pre- or postnatal
121 factors, and quantifying the potential detrimental effects posed by the underlying psychiatric
122 disorder if not treated adequately, has become imperative for an ultimate rational use of drugs in
123 pregnancy.

124 Real-world safety data on psychotropics in pregnancy and their incorporation into labelling
125 constitute an important first shift toward a modern pharmacovigilance system for maternal-child
126 health. This is essential for clinical guidance on treatment options and evidence-based
127 counselling to perinatal women with severe psychiatric disorders.

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