

April 7, 2022

The Honorable Robert Califf, MD
Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Ave.
Silver Spring, MD 20993

Dear Commissioner Califf:

Congratulations on your return to the U.S. Food and Drug Administration (FDA or Agency).

As you are being debriefed on key topics of interest to the Agency, we wanted to ensure that you were aware of a new, peer-reviewed study in *Menopause*, the Journal of The North American Menopause Society, titled [Safety and efficacy of compounded bioidentical hormone therapy \(cBHT\) in perimenopausal and postmenopausal women](#). This systematic review and meta-analysis of randomized controlled trials (RCTs) examined more than 3,000 full-text articles to identify cBHT-related studies. From those 3,000 articles, 29 randomized controlled trials were identified. The 29 studies collected data from more than 1,800 patients.

This meta-analysis found that women enrolled in RCTs of up to 12 months in duration did not have adverse changes in lipid profile or glucose metabolism – two risk factors for cardiovascular disease. In addition, there was no change in endometrial thickness or serious adverse events. Finally, vaginal cBHT was found to significantly improve vaginal atrophy symptoms. While this analysis sheds some light on the use of cBHT, the authors noted that long-term studies with clinical endpoints would be beneficial.

As you continue to evaluate what, if any, additional steps the FDA will take in response to the National Academies of Science, Engineering, and Mathematics (NASEM) study titled [The Clinical Utility of Compounded Bioidentical Hormone Therapy: A Review of Safety, Effectiveness, and Use](#) (2020), we encourage you to keep these new findings in mind and help ensure continued access to these important therapies. Finally, please note that we have also submitted this study to the docket (FDA-2015-N-0030), given that this general docket is where the Agency has requested to receive research (and other items) related to human drug compounding.

Sincerely,



Alliance for
Pharmacy
Compounding



cc: Gail Bormel, JD, RPh, Director, Office of Compounding Quality and Compliance