

EXECUTIVE SUMMARY: LOTRISONE LABELING OPTIONS

DATE: May 22, 2000

FROM: Division of Postmarketing Drug Risk Assessment I

SUBJECT: Possible options for Lotrisone labeling re safety

Background

In March, 1999 at the request of HFD-540, Division of Dermatologic and Dental Drug Products, we reviewed all adverse events to Lotrisone reported to the agency's Adverse Events Reporting System (AERS). The results showed that Lotrisone is widely used in the USA, and that adverse events are not rare. The data suggested that adverse events are associated with off label use of the drug, in terms of age, indication for use and length of use. This was particularly so in the pediatric age group.

In view of these findings we were requested to suggest labeling and other options aimed at improving the safe use of this drug.

Options

Label

We suggest the following options for strengthening the labels of both Lotrisone cream and Lotrisone lotion, if the latter is approved for marketing:

- 1) In the *Contraindications* section, add "Lotrisone is contraindicated in children under the age of 12 years", (alternative ages 6 or 2 years – decision on choice of age can be discussed); and "Lotrisone is contraindicated in diaper dermatitis."
- 2) Under *Precautions/Pediatric Use*, the statement re diaper dermatitis should be placed earlier/more prominently in the section and should be strengthened to read "Lotrisone should not be used in diaper dermatitis".
- 3) Under *Dosage and Administration*, and wherever occlusive dressings are mentioned as a contraindication, amend statement to read "Lotrisone should not be used under occlusive dressings including diapers."
- 4) Under *Adverse Reactions*, include a statement describing the postmarketing experience e.g. "The following adverse reactions have been reported in connection with the use of Lotrisone in infants and children under the age of 12 years: growth retardation, skin atrophy, and benign intracranial hypertension."
- 5) Under *Information for Patients* in the label we should note that "Lotrisone should not be used for diaper dermatitis nor in children under 12/6/2 years." (consistent with age decided in *Contraindication* section).

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Patient Package Information (if applicable)

We suggest the following: “Lotrisone should not be used in diaper dermatitis” and “Lotrisone should not be used in children under 12/6/2 years.” (consistent with above).

Box/tube

We suggest a display on the box and the tube to the effect that Lotrisone should not be used in diaper dermatitis or children under age 12/6/2 years (as above).

Educational campaign

Since usage data and published reports^{1,2} indicate that Lotrisone cream continues to be widely used in children under age 12 years, despite the 1991 label change, we suggest that the sponsor be required to undertake an educational campaign aimed at pediatricians and non-dermatologists to increase awareness of these safety issues with Lotrisone cream and lotion. Evaluation of the educational program should be undertaken by the sponsor at 6- and 12-month periods after completion to determine effectiveness of the program and the need for its continuation.

As part of this program a “Dear Healthcare Practitioner” letter should be strongly considered to alert non-dermatologists to the labeling change.

Postmarketing surveillance

We further suggest that the sponsor be required to submit to the agency all reports of potential corticosteroid related adverse events connected to Lotrisone lotion/cream in children under age 12 years, as expedited reports for the foreseeable future, with assessment of the need to continue based on the results of the sponsor’s educational program.

References

1. Smith ES, Fleischer Jr., AB, and Feldman SR. Nondermatologists are more likely than dermatologists to prescribe antifungal/corticosteroid products: An analysis of office visits for cutaneous fungal infections, 1990-1994. *Journal of the American Academy of Dermatology*. 1998; 30 (1) : 43-47
2. Fleischer Jr., AB and Feldman SR. Prescription of High-Potency Cortisteroid Agents and Clotrimazole-Betamethasone Dipropionate by Pediatricians. *Clinical Therapeutics*. 1999; 21(10):1725-31