

Labeling and Post Market Concerns:

Many members of the committee felt that interaction with multiple meds was totally unknown since it had not been studied and that this would be an additional problem that required labeling and post market studies.

Since there was little experience with doses over 160 mg the label should discourage this level of dosing. The sponsor should also be encouraged to do a dose escalation study.

Patient package inserts should be used by the FDA so that patients are made aware of possible interaction problems. One suggestion was to consider very specific information - such as the fact that light-headedness is not ok - because it could be a prelude to arrhythmia.

Little is known about the elderly, women, ethnic and pediatric usage and the risks associated with QTc intervals. Labeling should reflect this lack of knowledge and the sponsor should consider trials in this area.

The committee members had varying opinions on first line vs. second line status. Many were not familiar with the term. In general, there was doubt that many clinicians would follow the advice. There was however the general feeling that the physician should use thoughtfulness when using this drug and not use it because it is the newest thing around.

There were varying opinions on the value and utility of Black Box warnings. Since the agency has no information that it really impacts on physician behavior, many members felt that educating the MD was the most important obligation of the sponsor and of the FDA. Since psychiatrists are not used to QTc issues, the company should direct information to physicians on this issue. There was consensus that there needed to be strong warnings regarding the hypothetical risk of arrhythmia's but there was no consensus on how to implement this information.

A verbatim transcript of this meeting will be available on the FDA's Dockets Management Branch Website approximately 30 days after the meeting. The address is [HTTP://www.fda.gov/ohrms/dockets/ac/acmenu.htm](http://www.fda.gov/ohrms/dockets/ac/acmenu.htm).

I certify that I attended the July 19, 2000 meeting of the Psychopharmacologic Drugs Advisory Committee and that these minutes accurately reflect what transpired.

Sandra Titus 7/19/00

Sandra Titus, Ph.D. Date
Executive Secretary, PDAC

Carol Tamminga MD

Carol Tamminga, M.D.
Chair, PDAC

24 July 2000

Date

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