

**The Pediatric Advisory Committee (PAC):
proposed approaches to address increased workload**



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FDAAA: 2007 Update

- Expanded the PAC responsibilities to include pediatric safety reviews for products studied and labeled under the Pediatric Research Equity Act (PREA)
- Required labeling about pediatric studies performed under BPCA or PREA and specifically noted even if the studies were negative or inconclusive, information should be included in the label.
- This more than doubled the work load predictions for the PAC.

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PAC Work Load

- June 12-03 to March 25-08
- 79 Products have been reviewed at 13 sessions
- Range of 2 to 16 products/PAC session
- When only 2 to 4 products covered, combined with other topic for or expanded safety discussion
- PAC advised us 16 is too many at 1 time

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Work Load: Cont'd

- In 5 years, 79 BPCA products were reviewed
- 11 products from the mandated BPCA Exclusivity Reviews pending as of 3/08
- Since FDAAA enacted in Sept. of 2007 to June of 2008,
36 labeled products triggered a pediatric safety review
- THUS, 47 products already need review in 2009
- This will include biologic products and vaccines.

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Modifications Previously Requested by PAC: 2006

- Reviews no longer concentrate on the top 20 adverse events.
- Reviews to focus on pediatric deaths and serious AE's.
- Committee receives the same complete package for all new exclusivity products, irrespective of the type of presentation.
- If required to provide a better understanding of what is happening, AE's not only from the 1 year post exclusivity but from all years since marketing are presented. This includes integration of knowledge about what is occurring with adults when this information is thought to be relevant.

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Modifications: 2006-FDA recommendations to PAC

- Presentations are classified in 3 ways to permit focusing on the more interesting or controversial products.

Abbreviated, Standard & Expanded

- Products selected for the abbreviated process will have a condensed presentation. Each product had 3-4 slides shown for background.

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Types of Safety Presentations

What's New: 2008 ?

Follow-up Report only – PAC asked for report, no new issues identified

- Report in Briefing Packet but **no Presentation**
- Opportunity for Questions

Abbreviated – Continue to send complete Review package

- Reports in Briefing Packet but **no individual Presentations**
- 1 slide will list products and provide opportunity for questions

Standard – No new, unlabeled safety signals noted but complicated safety profile or treatment for diseases with high background rates of death or serious adverse events OR unclear .

- These products will continue to have a full presentation of the Office of Safety review, the use review , the safety outcomes from the pediatric trials, and pediatric labeling changes

Expanded – More or new AEs and discussion with possible safety concerns or confounding issues

- As above for Standard review and additional reviews or information may be presented

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Number of meetings of the PAC

- Because this committee also has other responsibilities re pediatric scientific issues and pediatric ethical issues, we are asking you to hold 4 dates per year.
- We do not think all of these can be for safety only.
- The proposed approach for the safety reviews attempts to decrease the amount of presentation time and hopefully we will need less time for products with no or little safety concerns
- This approach, however, does not decrease the volume of materials sent to the PAC for safety reviews
- We anticipate asking for your input after 2 or 3 meetings with this new approach to obtain additional recommendations as to how to be efficient and effective in the review of safety events reported for pediatrics.

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Types of Safety Presentations
What's on the Agenda for Today?

Follow-up Report only

– Zyvox

Abbreviated (we anticipate 7-9 products next time)

– Betoptic and Timolol

Standard

– Risperdal, Zyprexa, Levaquin, Lamictal,
Ambien, Lamisil, Aldara

Expanded

- Sandostatin Update

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- You are one of the busiest of FDA's Advisory Committees
- Your commitment and expertise are very much appreciated-we look forward to our work together.



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