
Guidance for Industry

Upper Facial Lines:

Developing Botulinum Toxin

Drug Products

DRAFT GUIDANCE

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**U.S. Department of Health and Human Services
Food and Drug Administration
Center for Drug Evaluation and Research (CDER)**

**August 2014
Clinical/Medical**

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Guidance for Industry¹

Upper Facial Lines: Developing Botulinum Toxin Drug Products

This draft guidance, when finalized, will represent the Food and Drug Administration's (FDA's) current thinking on this topic. It does not create or confer any rights for or on any person and does not operate to bind FDA or the public. You can use an alternative approach if the approach satisfies the requirements of the applicable statutes and regulations. If you want to discuss an alternative approach, contact the FDA staff responsible for implementing this guidance. If you cannot identify the appropriate FDA staff, call the appropriate number listed on the title page of this guidance.

I. INTRODUCTION

The purpose of this guidance is to assist sponsors in the clinical development of therapeutic biological products, specifically botulinum toxins, for the temporary improvement in the appearance of upper facial lines, such as glabellar lines or lateral canthal lines (LCLs). This guidance addresses the FDA's current thinking regarding the overall development program and clinical trial designs of botulinum toxin drug products to support approval for an upper facial lines indication. The information presented is intended to help sponsors plan clinical trials, design clinical protocols, and implement and appropriately monitor the conduct of clinical trials. This draft guidance is intended to serve as a focus for continued discussions among the Division of Dermatology and Dental Products, pharmaceutical sponsors, the academic community, and the public.² Development plans should be discussed with the review division before embarking on trials to ensure that the clinical trial design meets defined objectives.

This guidance does not contain discussion of the general issues of statistical analysis or clinical trial design. Those topics are addressed in the ICH guidances for industry *E9 Statistical Principles for Clinical Trials* and *E10 Choice of Control Group and Related Issues in Clinical Trials*, respectively.³

¹ This guidance has been prepared by the Division of Dermatology and Dental Products in the Center for Drug Evaluation and Research (CDER) at the Food and Drug Administration.

² In addition to consulting guidances, sponsors are encouraged to contact the division to discuss specific issues that arise during the development of botulinum toxin drug products.

³ We update guidances periodically. To make sure you have the most recent version of a guidance, check the FDA Drugs guidance Web page at <http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/default.htm>.

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37 This guidance does not contain a discussion of nonclinical or chemistry, manufacturing, and
38 controls (CMC) issues. For information concerning nonclinical and/or CMC issues, see the ICH
39 guidance for industry *M3(R2) Nonclinical Safety Studies for the Conduct of Human Clinical*
40 *Trials and Marketing Authorization for Pharmaceuticals* and the guidance for industry *For the*
41 *Submission of Chemistry, Manufacturing, and Controls Information for a Therapeutic*
42 *Recombinant DNA-Derived Product or a Monoclonal Antibody Product for In Vivo Use*.

43
44 FDA’s guidance documents, including this guidance, do not establish legally enforceable
45 responsibilities. Instead, guidances describe the Agency’s current thinking on a topic and should
46 be viewed only as recommendations, unless specific regulatory or statutory requirements are
47 cited. The use of the word *should* in Agency guidances means that something is suggested or
48 recommended, but not required.

49
50

51 **II. BACKGROUND**

52

53 Upper facial lines, also known as hyperdynamic lines or lines of facial expression, develop in the
54 skin of anatomic areas (e.g., glabella, lateral canthal area) overlying specific musculature (e.g.,
55 corrugator, procerus, orbicularis oculi).

56

57 There is an increase in demand for aesthetic procedures to treat the progressive development of
58 facial lines that are associated with the aging process. Injection of botulinum toxin to improve
59 the appearance of facial lines is one of the most common aesthetic procedures performed.⁴

60

61 Several botulinum toxin drug products for the temporary improvement in the appearance of
62 glabellar lines have received FDA approval, including onabotulinumtoxinA (2002),
63 abobotulinumtoxinA (2009), and incobotulinumtoxinA (2011).

64

65

66 **III. DEVELOPMENT PROGRAM**

67

68 **A. General Drug Development Considerations**

69

70 *1. Early Phase Clinical Development Considerations*

71

72 Trials to identify an appropriate (safe and effective) dose are an important component of phase 2
73 development for a botulinum toxin drug product. A dose-response trial conducted during the
74 early phase of clinical development (e.g., phase 2 clinical trials) to assess safety and efficacy at a
75 range of doses can help ensure that suboptimal doses or excessive doses (beyond those that add
76 to efficacy) are not used and may identify some dose-related side effects. For additional
77 information on the FDA’s current thinking regarding dose response, see the ICH guidance for
78 industry *E4 Dose-Response Information to Support Drug Registration* and the guidances for
79 industry *Providing Clinical Evidence of Effectiveness for Human Drug and Biological Products*

⁴ Sadick, N, 2004, The Cosmetic Use of Botulinum Toxin Type B in the Upper Face, *Clinics in Dermatology*, 22;29-33.

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80 and *Exposure-Response Relationships — Study Design, Data Analysis, and Regulatory*
81 *Applications*.

82
83 For topical drug products, sponsors should address unique concerns such as inadvertent injection,
84 unintended mucosal exposure, and unintended transfer of the drug product. A delivery system
85 designed to reduce the risk of inadvertent injection should be considered early in the
86 development process.

87
88 **2. *Drug Development Population***
89

90 The trial population should be representative of the target population for which the drug product
91 is intended for use in clinical practice (e.g., reflective of the age, race, and sex of the population
92 that will be using it for an improvement in upper facial lines in the United States). The inclusion
93 and exclusion criteria should be sufficiently broad to allow enrollment of a population that will
94 be representative of that anticipated with proposed labeling (e.g., representative of real-world
95 use).

96
97 Sponsors are required to submit pediatric study plans no later than 60 days after an end-of-phase
98 2 meeting.⁵ Because upper facial lines are uncommon in the pediatric population, the sponsor
99 may request a waiver for the requirement to submit a pediatric assessment in the pediatric study
100 plan.

101
102 If a sponsor plans to conduct clinical trials outside the United States, the sponsor should consider
103 factors that may affect the acceptability of such data for drug product approval in the United
104 States. Sufficient information should be provided to demonstrate that data from clinical trials
105 conducted outside the United States are applicable to and will predict the clinical outcomes in
106 U.S. patients (see 21 CFR 314.106). We also refer the sponsor to the ICH guidance for industry
107 *E5 Ethnic Factors in the Acceptability of Foreign Clinical Data* and the guidance for industry
108 *Collection of Race and Ethnicity Data in Clinical Trials*.

109
110 **3. *Efficacy Considerations***
111

112 In general, two adequate and well-controlled trials are needed to establish safety and efficacy of
113 a drug product that seeks an indication for the temporary improvement of upper facial lines. The
114 sponsor is referred to the guidance for industry *Providing Clinical Evidence of Effectiveness for*
115 *Human Drug and Biological Products*.

116
117 We recommend using both investigator-assessed and patient-reported outcome assessment tools
118 to support the primary efficacy endpoint. We encourage the use of well-defined, valid, and
119 reliable patient-reported outcome measures to assess the subject's perspective related to drug
120 product effectiveness.

121

⁵ See the Pediatric Research Equity Act (Public Law 108-155; section 505B(e)(2)(A) of the Federal Food, Drug, and Cosmetic Act; 21 U.S.C. 355B) as amended by the Food and Drug Administration Safety and Innovation Act (Public Law 112-144).

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122 See section III.B.9., Efficacy Endpoints, for a detailed discussion of endpoints and endpoint
123 assessments.

124
125 **4. *Safety Considerations***

126
127 The protocol should specify the methods to be used to obtain safety data during the course of the
128 clinical trials. Generally, both adverse event information and safety laboratory data should be
129 collected during clinical trials. All subjects should be evaluated for safety at the time of each
130 trial visit or assessment, regardless of whether the investigational drug product has been
131 discontinued. All adverse events should be followed until resolution, even if time on clinical
132 trial would otherwise have been completed.

133
134 Botulinum toxin drug products present a unique set of safety concerns related to the potential for
135 local and distant spread of toxin effect. Therefore, safety data related to this specific potential
136 effect should be obtained through directed query and physical examination to evaluate for signs
137 and symptoms of local and distant spread of toxin effect (see Appendix A). Assessment for
138 effects on the neuromusculature should be performed for a sufficient duration post-treatment to
139 capture late-onset events.

140
141 Sponsors should conduct repeat-dose trials to evaluate efficacy and safety after repeated
142 administration of the investigational drug product for the improvement of upper facial lines. For
143 drug products that seek an indication for upper facial lines in more than one anatomic area, drug
144 product safety information would be needed for each area independently as well as for
145 concomitant administration to more than one anatomic area, because adverse reactions related to
146 local spread of toxin effect often will be specific to the anatomic area.

147
148 Drug products for the temporary improvement of upper facial lines have the potential for chronic
149 intermittent use; therefore, sponsors should establish the long-term safety of the drug product in
150 the proposed population at the proposed dose. Long-term controlled trial data are preferred over
151 open-label extension safety data because of the difficulty in interpreting adverse events data in
152 the absence of a concurrent control. The ICH guidance for industry *E1A The Extent of*
153 *Population Exposure to Assess Clinical Safety: For Drugs Intended for Long-Term Treatment of*
154 *Non-Life-Threatening Conditions* provides advice regarding the number of subjects exposed and
155 duration of treatment needed to inform the safety database. However, because upper facial lines
156 are aesthetic indications and the risk-benefit assessment for this indication differs from that for
157 indications such as blepharospasm, cervical dystonia, migraine, or spasticity, the minimum
158 number of subjects described in ICH E1A may not be sufficient to allow assessment of the risk
159 versus the benefit for the indications of upper facial lines, conditions with minimal morbidity.
160 The size of the safety database may vary depending on the formulation and anatomic location to
161 be treated. We recommend consulting the review division regarding this issue.

162
163 Sponsors should address the potential for immunogenicity of botulinum toxin, especially for a
164 long-term treatment paradigm, and evaluate the effect of immunogenicity on the efficacy and
165 safety.

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167 **B. Phase 3 Efficacy Trial Considerations**

168
169 The protocol should describe the trial objectives, the target population, investigational drug
170 product dosage and duration of treatment, the primary endpoints, and key planned statistical
171 analyses. In addition, the trial design should support the proposed claims by taking into
172 consideration the following factors.

173
174 1. *Trial Design*

175
176 In general, sponsors should conduct two randomized, double-blind, controlled trials to establish
177 efficacy and safety. The preferred design should include a comparison to placebo or vehicle. In
178 a placebo-controlled design, potential influences on the course of the condition other than those
179 arising from the pharmacologic action of the investigational drug product can be controlled via
180 randomization and blinding. The sponsor is referred to the guidance for industry *Providing*
181 *Clinical Evidence of Effectiveness for Human Drug and Biological Products*.

182
183 2. *Trial Population*

184
185 The trial population should reflect the patient population that would be reasonably considered for
186 treatment with the drug product, should the drug product be shown to be effective. It is
187 important that the trial population not be made artificially narrow.

188
189 The past use of botulinum toxin drug products may affect the outcome with regard to both safety
190 and efficacy and should be addressed in protocols for the temporary treatment of upper facial
191 lines. In addition, the likelihood of unintentional unblinding could increase because individuals
192 previously treated with botulinum toxin for upper facial lines may be more likely to determine
193 whether they received the investigational drug product or placebo. If subjects are enrolled who
194 have had previous treatment with botulinum toxin, sponsors should record this status at baseline
195 to allow for a subgroup analysis to explore how previous exposure affects safety and efficacy.

196
197 To adequately represent the population of future use, the pivotal trials should enroll subjects with
198 all levels of severity of facial lines who meet the inclusion criteria, including subjects at the
199 upper end of severity.

200
201 We encourage enrollment of subjects with a diversity of Fitzpatrick skin types.

202
203 A sufficient number of subjects 65 years of age and older should be evaluated at the level of
204 exposure (dose and duration) proposed for use to support conclusions regarding drug safety and
205 efficacy in this population. Refer to the ICH guidance for industry *E7 Studies in Support of*
206 *Special Populations: Geriatrics*.

207
208 3. *Inclusion and Exclusion Criteria*

209
210 Inclusion criteria should specify a minimum baseline level of condition severity.

211

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212 Subjects with the following characteristics should be excluded from trials for the temporary
213 improvement of upper facial lines:

- 214
- 215 • Concurrent or recent (e.g., within the last 6 months) use of any other botulinum toxin
216 drug product
- 217
- 218 • Known immunization or hypersensitivity to any botulinum toxin serotype
- 219
- 220 • Anticipated need for treatment with botulinum toxin of any serotype for any reason
221 during the trial (other than the investigational treatment)
- 222
- 223 • Any medical condition that may put the subject at increased risk with exposure to
224 botulinum toxin including diagnosed myasthenia gravis, Eaton-Lambert syndrome,
225 amyotrophic lateral sclerosis, or any other condition that might interfere with
226 neuromuscular function
- 227
- 228 • Pregnancy or lactation
- 229

230 4. *Concomitant Treatments*

231

232 Sponsors should address in the protocol the use of other drug products that are intended for the
233 treatment of wrinkles or facial lines, such as retinoids and fillers, for the temporary improvement
234 of upper facial lines because concomitant use of these drug products may affect the outcomes.
235 The protocol should define the concomitant therapy that is acceptable, and sponsors should
236 record information on use of concomitant medications for a prespecified period before and
237 during the trial. One option would be to exclude use of such drug products (such as retinoids and
238 fillers) for an appropriate interval before trial initiation and for the duration of the trial (or at least
239 up to the primary assessment time point).

240

241 5. *Randomization, Stratification, and Blinding*

242

243 Subjects should be randomized for receipt of the investigational drug product at enrollment. All
244 trials should be multicenter, well-controlled, and double-blind. Randomization and blinding are
245 important to minimize biases.

246

247 Efficacy assessments in the evaluation of drug products for the temporary treatment of upper
248 facial lines have a certain level of subjectivity. In addition, the mechanism of action of
249 botulinum toxin (paralysis or diminution of facial muscular activity) may lead to unblinding even
250 in subjects who do not meet objective criteria to be considered responders. Therefore, it is
251 important that the protocol documents steps to maintain double-blinding (subject and assessor) to
252 the extent possible. (See section III.B.11., Endpoint Adjudication.)

253

254 If the effects of treatment are expected to differ substantially among different groups of subjects
255 (e.g., baseline condition severity, prior botulinum toxin use), it may be desirable to stratify at
256 randomization on that factor.

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258 6. *Specific Populations*

259
260 The currently approved botulinum toxin drug products' labeling indicates that there are no
261 adequate and well-controlled trials in pregnant women.

262
263 As noted in section III.B.3., Inclusion and Exclusion Criteria, pregnant subjects and nursing
264 mothers should be excluded from trials of botulinum drug products for the temporary treatment
265 of upper facial lines.

266
267 With regard to pediatric subjects, as noted in section III.A.2., Drug Development Population,
268 upper facial lines are uncommon in the pediatric population; the sponsor may request a waiver
269 for the requirement to submit a pediatric assessment.

270
271 With regard to geriatric subjects, as noted in section III.A.2., Drug Development Population, a
272 sufficient number of subjects 65 years of age and older should be evaluated at the level of
273 exposure (dose and duration) proposed for use to support conclusions regarding drug safety and
274 efficacy in this population.

275
276 7. *Dose Selection*

277
278 Clinical trials to identify an appropriate (safe and effective) dose are an important component of
279 phase 2 development for a botulinum toxin drug product. (See section III.A.1., Early Phase
280 Clinical Development Considerations, for a more detailed discussion of dose-ranging.)
281 Assessment of the safety and efficacy of repeat treatment should be included in the development
282 program.

283
284 8. *Choice of Comparators*

285
286 See section III.B.1., Trial Design, for a discussion of comparators.

287
288 9. *Efficacy Endpoints*

289 a. Assessment measures

290
291
292 Measurements at maximum contraction should be used to assess the efficacy of botulinum toxin
293 drug products to demonstrate the paralytic effect of the botulinum toxin. This is needed to
294 justify the use of botulinum toxin in a drug product intended for aesthetic use (i.e., to show that
295 the toxin has a paralytic effect on muscle and therefore is necessary for drug product
296 effectiveness).

297
298 The recommended co-primary efficacy endpoints should be based on *well-defined and reliable*⁶
299 clinician-reported and patient-reported assessments that are developed to measure the critical
300 outcomes that contribute to a conclusion of overall success or failure.

301

⁶ See 21 CFR 314.126.

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302 Instrument development for the subject assessment of line severity in the targeted area should be
303 based upon qualitative research conducted in the target patient population to ensure the
304 instrument content is appropriate for the targeted patient population to be studied in clinical
305 trials.⁷ Similarly, clinician input is valuable in the development of well-defined and reliable
306 clinician-reported outcome measures. Upper facial lines are aesthetic conditions; therefore, the
307 endpoints should include an assessment of the effect of the drug product on outcomes that are
308 important to the targeted patient population. If an adequate patient-reported or clinician-reported
309 instrument is not available for assessment of upper facial lines, the new instrument development
310 process should begin well in advance of phase 3 clinical trials so that the instrument can be ready
311 for incorporation into the phase 3 protocol.

312
313 For both investigator- and subject-assessment instruments, the scales should be ordinal, static
314 (meaning the evaluation is of the current severity rather than a change in severity relative to a
315 previous time point), and comprised of a limited number of categories or grades. Each category
316 should represent a distinct and clinically meaningful gradation of the condition, and should be
317 defined by a noncomparative, nonoverlapping, clinically relevant morphologic description to
318 minimize interobserver variability. The category of “none” or zero should represent true absence
319 of the condition. A photonumeric guide with examples of each grade can be provided to
320 investigators and subjects as an assessment aid to facilitate optimal inter- and intrarater
321 reliability. The same scale should be used throughout the trial, including at enrollment, at the
322 primary efficacy time point, and at time of assessment for loss of effect. To provide internal
323 correlation, the subject’s self-assessment (SSA) and the investigator’s assessment (IA) scales
324 should contain the same number of categories.

325
326 The degree of improvement determined to be clinically meaningful (and therefore appropriate for
327 regulatory decisions) should be determined during instrument development and should be
328 discussed with the FDA before trial initiation. Statistically significant differences between
329 comparator regimens may not be sufficient for demonstrating benefit if response to treatment has
330 not been shown to be clinically meaningful.

331
332 For LCLs, efficacy should be based on bilateral results (both sides of the face) rather than results
333 from each side of the face counted separately. Success should be determined at the subject level
334 such that a subject would be considered a success only if both left and right side assessments
335 meet the success criteria.

336
337 We also encourage sponsors to discuss endpoint measures with the FDA in the early planning
338 phases of clinical development. For novel outcome measures, we recommend that the sponsor
339 submit a draft instrument (complete instrument and description of plans for the development and
340 testing of the instrument) to the investigational new drug application for FDA review as early as
341 possible in the development program.

342

⁷ For recommendations on how to determine whether a clinical outcome assessment is well-defined and reliable, refer to the guidance for industry *Patient-Reported Outcome Measures: Use in Medical Product Development to Support Labeling Claims*.

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b. Endpoints

For each anatomic region, the primary efficacy endpoint should be based on responder rates defined by an IA scale at maximum contraction and an SSA scale at maximum contraction. Maximum contraction should be defined based on the targeted area (e.g., maximum frown for glabellar lines, maximum smile for LCLs).

As discussed in section III.B.9.a., Assessment measures, assessment at maximum contraction is needed to show that the toxin has a paralytic effect on muscle and therefore is necessary for the drug product's efficacy. A drug product containing botulinum toxin that fails to demonstrate an effect at maximum contraction might have difficulty showing a favorable risk-benefit profile that is at the heart of regulatory decision making. In addition, demonstration of efficacy at both extremes (maximum contraction (which represents the worst appearance of upper facial lines with maximum load on the muscle) and at rest (which represents the best appearance of upper facial lines with the least load on the muscle)) allows one to impute benefit when the face is in dynamic motion (variable load on the muscle).

The clinician's and subject's assessments of line severity at maximum contraction should be used at baseline to establish enrollment eligibility. There should be a sufficient score at enrollment on each instrument such that a clinically meaningful response can be observed.

Success should be defined as achievement of a score of 0 or 1 *and* a two-grade improvement from the baseline, on both the IA and the SSA scales concurrently, to ensure clinical significance. Because it may be possible to move to an adjacent category on the assessment scale with only a small level of improvement, a one-grade change may not represent a clinically meaningful intrasubject change.

Secondary endpoints should be clinically relevant, limited in number, and adjusted for multiplicity to control the type I error rate. Assessments at rest (as opposed to at-maximum contraction) provide supportive evidence of efficacy and may be useful as secondary endpoints.

10. Trial Procedures and Timing of Assessments

Clinical trial duration should be based on the onset of action of the drug product and should be of sufficient length to assess the durability of therapy benefits. The clinical development program should include a trial that incorporates repeated doses for at least 1 year to assess for the safety of repeat doses.

Sponsors should also provide adequate evidence to support the selection of the time point(s) for assessment of the primary efficacy outcome. The time point for assessment of the primary outcome should be at or after the onset of the full effect of the botulinum toxin drug product.

Sponsors should evaluate duration of effect with a clinically and statistically meaningful approach. Assessment measures for duration of effect should be the same as for the primary efficacy endpoint. Assessment of the duration of effect should reflect the time period for which a clinically meaningful proportion of subjects maintain response.

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11. *Endpoint Adjudication*

Unblinding is a significant concern in trials for botulinum toxin drug products for the improvement in the appearance of facial lines. Therefore, results of review of photographs at maximum contraction by a masked, independent committee of experts using the investigator’s static scale should be provided as a secondary endpoint.

12. *Statistical Considerations*

Sponsors should address general statistical principles (e.g., randomization, blinding, prespecification, multiplicity control of type I error) in trials for botulinum toxin drug products for the improvement of upper facial lines in the same way as in trials for other medical drug products. However, some statistical issues may need special consideration in clinical trials for upper facial lines.

Sponsors should describe the randomization scheme, including the randomization ratio, and any stratification factors or block size, along with adequate details about how subject assignment will be carried out. Double-blind trials should be conducted whenever possible because of the subjective nature of the efficacy assessments.

Clinical trials should be adequately powered for the primary efficacy endpoints. Sample size calculations are typically based on type I error, power, and expected outcomes. In some cases, there may be a need to power the trial for safety as well, so that important adverse reactions can be adequately characterized, because there may be a low tolerance for serious or bothersome adverse reactions associated with aesthetic use drug products.

If the trial is designed with more than one primary endpoint, the protocol should specify the methodology that will be used to control the overall type I error rate. The protocol should include a plan for adjusting for multiplicity in cases with more than one primary or secondary endpoint. If the primary efficacy endpoint is a success rate based on meeting multiple criteria for achieving response, then the criteria for achieving success should be defined (e.g., achieving a score of 0 or 1 and at least two grades reduction on both the IA and SSA scales).

Sponsors should specify the statistical methods to be used for the analysis of all endpoints. They should be appropriate for the type of data collected. The statistical methods should be specified with sufficient details, including any model terms, covariates, or stratification factors. If there are particular subgroups of interest, subgroup analyses should be planned in the protocol. The subgroup analyses should be designed so as to maintain control of the type I error rate.

The primary analysis population should be the intent-to-treat population defined as all subjects randomized and dispensed the investigational drug product. The protocol should prespecify a plan for handling missing data, along with the justification for any assumptions needed for the imputation method. The protocol should also prespecify a plan for sensitivity analyses regarding the handling of missing data.

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435 Sponsors should describe the follow-up visit schedule. Long-term follow-up may be needed to
436 assess duration of effect. Protocols should include plans to minimize loss to follow-up, because
437 subjects may not be motivated to return for follow-up after receiving treatment or may comply
438 with only some of the post-treatment visits.

439
440 Because botulinum toxin drug products generally are administered by the investigator,
441 investigator technique or skill may affect the results. Trials should be designed to enroll a
442 sufficient number of subjects per center so that investigator-to-investigator variability and
443 treatment-by-center interactions can be adequately assessed.

444
445 *13. Accelerated Approval (Subpart H) Considerations*

446
447 Upper facial lines are not a “serious or life-threatening condition”; therefore, accelerated
448 approval is not appropriate.

449
450 *14. Risk-Benefit Considerations*

451
452 Assessment of risks and benefits involves an assessment of the effect of the botulinum toxin drug
453 product on the condition of upper facial lines. The primary efficacy analysis should demonstrate
454 a statistically significant result and the measured clinical effect of the botulinum toxin drug
455 product should be clinically meaningful. Toxicities related to the pharmacologic effects of the
456 botulinum toxin drug product (e.g., potential for distant spread of toxin effect) also should be
457 considered as part of this overall risk-benefit assessment.

458
459 **C. Other Considerations**

460
461 *1. Risk Management Considerations*

462
463 Botulinum toxin drug products for the treatment of upper facial lines are prescriber-administered.
464 Patients need to be aware of the potential safety issues that have arisen with the use of these drug
465 products to make an informed decision as to whether they wish to receive this therapy. For this
466 reason, a Medication Guide should be provided to each patient before treatment after approval.

467
468 *2. Pharmacokinetic/Pharmacodynamic Considerations*

469
470 Currently, it is not possible to detect botulinum toxin in the peripheral blood following
471 intramuscular injection at doses recommended for use for approved drug products for upper
472 facial lines because of the limits of available analytical technology. The need for
473 pharmacokinetic assessment may be reevaluated as new technologies become available.

474
475 *3. Special Investigation Considerations*

476
477 For topical products, dermal safety studies with the final to-be-marketed drug product should
478 provide information regarding cumulative irritancy, contact sensitization, phototoxicity, and
479 photo-contact allergic potential.

480

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481 4. *Labeling Considerations*

482

483 The labeling for botulinum toxin drug products should include a boxed warning that describes
484 the risk of distant spread of toxin effect as well as a Medication Guide to help patients better
485 understand the potential risks associated with these drug products.

486

487 The labeling also should include a subsection in the WARNINGS AND PRECAUTIONS section
488 that warns that the potency units of one botulinum toxin drug product are not interchangeable
489 with other preparations of botulinum toxin drug products. Recommended frequencies for
490 retreatment should be included in the DOSAGE AND ADMINISTRATION section.

491

492 The INDICATIONS AND USAGE section of labeling for botulinum toxin drug products
493 intended to improve upper facial lines should identify the anatomic location of the lines and the
494 underlying musculature involved in their development. The nonpermanent nature of the
495 treatment should be conveyed.

496

497 Representative examples of indication statements for a botulinum toxin drug product intended to
498 improve upper facial lines can include:

499

500 • The temporary improvement in the appearance of moderate to severe glabellar lines
501 associated with corrugator and procerus muscle activity in adults

502

503 • The temporary improvement in the appearance of mild to moderate LCLs associated with
504 orbicularis oculi activity in adults

505

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APPENDIX A

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The following adverse events potentially suggestive of *distant spread of toxin*, and therefore of special interest, include:

accommodation disorder	extraocular muscle paresis	paresis cranial nerve
areflexia	eyelid function disorder	peripheral nerve palsy
aspiration	eyelid ptosis	peripheral paralysis
blurred vision	facial palsy	pelvic floor muscle weakness
botulism	facial paresis	pneumonia aspiration
Bradycardia	fourth cranial nerve paresis	pupillary reflex impaired
bulbar palsy	hemiparesis	quadriparesis
constipation	hypoglossal nerve paresis	respiratory arrest
cranial nerve palsies	hyporeflexia	respiratory depression
cranial nerve paralysis	hypotonia	respiratory failure
diaphragmatic paralysis	monoparesis	speech disorder
diplopia	muscular weakness	third cranial nerve paresis
dry mouth	paralysis	trigeminal nerve paresis
dysarthria	paralysis flaccid	urinary retention
dysphagia	paralytic ileus	vocal cord paralysis
dysphonia	paraparesis	vocal cord paresis
dyspnea	paresis	

511