

1 may have to take an unscheduled break.

2 At this time though, I'd like to get the
3 meeting started, and I'd like to introduce you to Dr.
4 Arnold Monto, the acting chair, who will now provide
5 opening remarks. Dr. Monto, you're ready? Take it
6 away.

7 **DR. ARNOLD MONTO:** Thank you, Mike. I'd like
8 to add my welcome to the 166th meeting of the Vaccines
9 and Related Biological Products Advisory Committee of
10 the Center for Biologics Evaluation and Research. It
11 is my pleasure to open the meeting and to remind you of
12 the one topic that we have for the meeting. We will
13 meet in open virtual session to discuss, in general,
14 data needed to support authorization and/or licensure
15 of COVID-19 vaccines for use in pediatric populations.

16 So I'd like now to hand over to our designated
17 federal officer, Prabha Atreya, who will give the
18 administrative announcements, the roll call, and
19 introduce the Committee. Prabha.

1 previous peak in January of 2021 that was driven by
2 cases in the Americas and in Europe. Globally, the
3 incidence of cases has increased and decreased over
4 time, and the trends have been driven by different
5 geographic regions.

6 This slide shows the daily and moving seven-
7 day average incidents of SARS-CoV-2 cases within the
8 United States. As of June 4th, there were over 33
9 million total cases reported. The current seven-day
10 average of 14,349 daily new cases continues a downward
11 trajectory with a 35.2 percent decrease compared to the
12 week prior.

13 Similarly, this graph shows SARS-CoV-2 deaths
14 in the United States over time. Almost 600,000 deaths
15 have been attributed to SARS-CoV-2. The seven-day
16 moving average count on June 4th was down 21.6 percent
17 compared to the week prior. For the most part, trends
18 in deaths continue to follow the trends in case counts.

19 Now, let's transition and talk specifically
20 about the epidemiology of COVID-19 in children and
21 adolescents. I thought we would first start with a

1 review of what is already published as there are
2 numerous published studies and reviews. Early reports
3 that relate to the epidemiology of SARS-CoV-2, in
4 children specifically, largely utilize convenience
5 and/or observational data. This was largely an
6 opportunistic use of data that was available while
7 better systems and/or studies were being developed
8 and/or starting to enroll participants.

9 The other thing to note is that analyses of
10 "children" often include participants less than 18
11 years of age all grouped together. In summary, the
12 published literature on infection and transmission of
13 SARS-CoV-2 and children remains largely mixed. Some
14 studies suggest that children are infected less; others
15 show that infection rates are similar to those seen in
16 adults. Some studies show that children transmit virus
17 less, and others show that transmission is similar for
18 children as it is in adults.

19 I want to review a couple of important
20 epidemiologic principles before I transition to
21 highlighting some of the important data. First and

1 foremost, young children are not physiologically or
2 socially equivalent to older children, adolescents, or
3 adults. I realize everyone probably is well aware of
4 this, but it's a reminder that age should be
5 disaggregated whenever possible, for example, into
6 finer age bands of less than 5 years, 6 to 11 years, or
7 12 to 17 years as an example.

8 Secondly, we have to be aware of biases on
9 interpreting data related to COVID-19 in children.
10 Exposures and behaviors both impact the observed
11 infection rates that we see, not only biologic
12 differences. Incidence and transmission estimates
13 should be unbiased by care-seeking behavior. So, in
14 short, if you do not look for infected children outside
15 of clinical studies, you're probably going to miss
16 them.

17 And lastly, universal testing is important
18 when trying to understand the epidemiology of COVID-19
19 in children. Testing should be done independent of
20 presence or absence of symptoms when trying to better
21 understand rates of infection and transmission risks.

1 So the epidemiology of COVID-19 in children
2 definitely differs from that in adults. This is due to
3 many factors that ultimately lead to a child becoming
4 infected or not infected. Each is important for
5 understanding the transmission patterns, and this is
6 kind of breakdown of the important epidemiologic
7 factors for us to consider and that we do have
8 increasing data to inform our understanding.

9 To start with, in general, children are
10 susceptible to SARS-CoV-2 infection. From various
11 studies, when testing systematically in children
12 exposed to SARS-CoV-2, children are as likely to have
13 infections detected as adults. However, one caveat to
14 consider is that the risk of exposure for children
15 relative to adults has changed dramatically over the
16 course of the pandemic. For example, at the start of
17 the pandemic, full societal shutdowns likely benefitted
18 children more than adults, meaning it likely reduced
19 exposures for children more than it did for adults.
20 This pattern that we see as kids relative to adult has
21 likely dramatically changed when schools reopened and

1 when society has reopened more broadly, which does
2 change the risk for children.

3 The next factor considered is the risk for
4 transmission. Children or adolescents can transmit
5 SARS-CoV-2, and I'll review some data specifically on
6 this topic. We now have studies with strong methods
7 that account for differences and exposures and include
8 universal testing. Within these studies, we are seeing
9 that children are transmitting SARS-CoV-2.

10 And then, finally, there's clinical factors
11 and outcomes to consider. Children and adolescents are
12 less likely to seek testing for SARS-CoV-2 and are less
13 likely to require medical care. This is due to the
14 fact that the risk for systematic and severe illness is
15 lower in children and in adolescents relative to most
16 adult age groups.

17 Now, I want to review some important and
18 fairly new data with all of you. This data is from the
19 Coronavirus Household Evaluation and Respiratory
20 Testing Cohort Study. This is a prospective cohort of
21 households that include children less than 18 years.

1 The presence of a child in the household is required
2 for enrollment, but all household members are enrolled
3 and followed.

4 Enrollment is in two sites: one in New York
5 City and the other including select counties in the
6 state of Utah. The cohort includes 1,196 individuals
7 across 300 households, and they were originally
8 enrolled in the fall of 2020. Individuals in the
9 cohort participate in weekly surveillance testing for
10 SARS-CoV-2 infection. In addition to weekly testing
11 that is independent of symptoms, they respond to weekly
12 inquiries about whether they have had any illness
13 symptoms that meet a COVID-like illness case
14 definition.

15 In addition to their weekly screening with
16 mid-turbinate nasal swabs, individuals also collect an
17 additional swab at the onset of any COVID symptoms.
18 All the viral testing is done via RT-PCR. This slide
19 shows that incident rates of SARS-CoV-2 infection per
20 1000 person weeks by age group overall and at each
21 site. These are data from September 2020 through

1 February of 2021. Both sites during this time period
2 experienced a clearly defined single wave of SARS-CoV-2
3 circulation.

4 The different colored bars indicate four age
5 groups: children 0 to 4 years, 5 to 11 years, 12 to 17
6 years, and adults 18 years and older. As you can see
7 here, incident rates were similar across the age groups
8 at both sites and overall among the cohort as
9 indicated.

10 This slide includes data from FLUTES-C, an
11 ongoing household transmission study in Tennessee and
12 Wisconsin. Whereas the last study I described is a
13 cohort study, this is a case ascertained household
14 transmission study in which lab-confirmed SARS-CoV-2
15 index cases and all household contacts are enrolled to
16 assess secondary infection rates. The top of the table
17 on the left shows the age category of the primary case
18 or the first case in the household developed illness or
19 to test positive. The numbers of total household
20 contacts are also shown in the first column.

21 The second column shows the secondary

1 infection rate of household contacts. In general, the
2 top part of the table captures transmission risk from
3 various age categories. As you can see, the secondary
4 infection rate for primary cases ages 0 to 4 was 46
5 percent. Secondary infection rates for household
6 members where the primary case of 5 to 11 years is 64
7 percent.

8 The third column in the graph on the right
9 shows the risk ratio of secondary infection rates for
10 each age group relative to the reference group, age 18-
11 to 49-year-olds. As you can see, there's not a
12 statistical difference between secondary infection
13 rates for children primary cases relative to adult
14 primary cases. The bottom part of the table captures
15 ages of contacts in their secondary infection rates,
16 somewhat analogous to the last study we described.
17 And, as you can see here, there's no statistical
18 difference between secondary infection rates for child
19 contacts compared to adult contacts.

20 This slide is from an early field epidemiology
21 household transmission investigation that was done in

1 Utah and Wisconsin. This slide compares the presence
2 of symptoms in children and adults with COVID-19 after
3 household exposures. By way of disclosure, the age
4 categories here do group all individuals less than 18
5 years into one category.

6 But, as you can see, in general, younger
7 children and adolescents have less symptomatic illness
8 when infected with SARS-CoV-2 than adults. Children
9 have more upper respiratory symptoms, largely driven by
10 rhinorrhea and runny nose, but they have significantly
11 less lower respiratory symptoms. The same pattern with
12 children being less symptomatic has definitely held up
13 through several studies throughout the pandemic.

14 Let's transition and talk a little bit more
15 about hospitalizations. We also see that children have
16 lower hospitalizations than adults of all ages. This
17 graph shows the number of new COVID-19 hospital
18 admissions per 100,000 population, stratified by age.
19 The yellow dotted line shows 0 to 17 years. The solid
20 black line shows the total for all ages, and the purple
21 line at the top shows the hospitalization rates for

1 those 70 plus years.

2 The graph on the right shows children and
3 adolescent hospitalization rates placed on a different
4 y-axis than the graphic on the left. The y-axis for
5 the graph on the right showing children 0 to 17 years
6 is over a scale of magnitude lower than the graphic on
7 the right.

8 This slide shows disaggregated rates of
9 hospitalization for children and adolescents, and it's
10 from the MMWR that was just published last week. In
11 short, it shows hospitalization rates for children and
12 adolescents throughout the pandemic by using CDC's
13 COVID net hospitalization surveillance data. The y-
14 axis shows hospitalization rates per 100,000
15 populations and the x-axis shows the calendar weeks
16 throughout the pandemic. Ages 0 and 4 are shown in the
17 solid blue line. Ages 5 to 11 are shown in the wide
18 dashed line, and ages 12 to 17 are shown in the narrow
19 dashed line. As you can see, younger children and
20 those between 0 and 4 years and adolescents between 12
21 and 17 years had higher hospitalization rates compared

1 to children 5 to 11.

2 Furthermore, we also have looked at
3 seroprevalence data by age. In summary for this slide,
4 CDC is partnering with commercial laboratories to
5 conduct and publish results from large-scale geographic
6 seroprevalence testing that uses deidentified clinical
7 blood specimens from all 50 states, D.C., and Puerto
8 Rico. They use these residual specimens for SARS-CoV-2
9 antibody testing. The survey includes people of all
10 ages because we had blood specimens tested for reasons
11 unrelated to COVID, such as routine or sick visits in
12 which blood was collected and tested by one of three
13 private commercial labs across the 52 sites.

14 The data presented here is from the latest
15 round of testing, covering the period from February
16 15th through March 21st, 2021. These are anti-
17 nucleocapsid estimates and, therefore, do not take into
18 account vaccination-induced seropositivity. The data
19 shown here is available on CDC's website, and it's
20 updated regularly as testing is scheduled to continue
21 throughout the rest of this year.

1 As you can see, seroprevalence among children
2 and adolescents 0 to 17 years is actually the highest
3 among all age groups. Notably, although a finer age
4 band illustration is not presented on this slide, they
5 have assessed this, and a manuscript for publication is
6 currently under development. Importantly, when we look
7 at children 0 to 11 years versus children 12 to 17
8 years, both age groups have approximately the same
9 seroprevalence. Or put another way, younger children's
10 seroprevalence is similar to that of older children and
11 adolescents in this most recent survey.

12 Taking all the epidemiologic differences I
13 just reviewed and incorporating the evidence, CDC has
14 created a model that estimates the burden of SARS-CoV-2
15 by age and different disease outcomes within the U.S.
16 during the pandemic to date. The goal of these age-
17 specific burden estimates are to better approximate the
18 true number of cases, symptomatic illnesses, and
19 hospitalizations to date. Age categories are listed in
20 the first column on the table, followed by the point
21 estimates and uncertainty intervals for rates of

1 infection, rates of symptomatic illness, and rates of
2 hospitalization. All of the rates shown are per
3 100,000 population.

4 As you can see infection rates in children 0
5 to 4 are estimated to be lower than older children and
6 adults. However, school-aged children and adolescents
7 between the ages of 5 and 17 have had infection rates
8 similar to those in some of the adult-aged category.
9 When looking at symptomatic illness, you can see a
10 similar pattern. Rates of symptomatic illness in
11 children 0 to 4 are lower than older children,
12 adolescents, and adults. Children and adolescents
13 between 5 and 17 have an infection rate similar to
14 those in the adult-aged categories.

15 Importantly, hospitalization rates among
16 children, including younger and older children, are
17 lower than all of the adult-aged categories. Of note,
18 these estimates are updated regularly as we gain more
19 data and are publicly available also on CDC's website.
20 Patterns in the burden estimates will change with time
21 as other public health policies evolve. An important

1 example of this may be variable vaccination across
2 different age groups.

3 I want to transition and talk a bit more about
4 a specific severe clinical 19 [sic] outcome or
5 Multisystem Inflammatory Syndrome in children.
6 Multisystem Inflammatory Syndrome in children's an
7 illness in persons aged less than 21 years is
8 characterized by fever greater than 38 degrees Celsius,
9 multisystem organ involvement, lab evidence of
10 inflammation, and a current or recent diagnosis of
11 SARS-CoV-2 infection or exposure with no alternative
12 plausible diagnosis.

13 By way of history, MIS-C was first identified
14 in April of 2020 in a cluster of children in Europe who
15 experienced hyperinflammatory shock following SARS-CoV-
16 2 infection. In May of 2020, CDC developed a case
17 definition, published a health advisory, and requested
18 suspected cases of MIS-C in the U.S. to be reported to
19 the Health Department. Since then, 51 jurisdictions
20 have reported MIS-C cases to CDC. CDC's been working
21 to summarize the cases reported to our national

1 surveillance system to better describe and understand
2 MIS-C. And this data included what has been reported
3 through, I think, May of 2021.

4 So since May of 2020, CDC has received reports
5 of 4,118 confirmed cases of MIS-C in the U.S. with
6 onset between February 19th, 2020, and May 18th, 2021.
7 Shown here is the epidemic curve plotting the seven-day
8 moving average number of MIS-C cases represented by the
9 solid line and COVID-19 cases represented by the dotted
10 line. The left y-axis defines the number of daily
11 average MIS-C cases in units of five. The right y-axis
12 defines the number of daily average COVID-19 cases
13 among all ages in units of 50,000. The grayed-out area
14 on the right side of the figure represents the most
15 recent three-week period for data of which reporting is
16 still incomplete. Cases of MIS-C have occurred in
17 three waves, and you can visually see the peaks of MIS-
18 C following the peaks of COVID-19 infection.

19 The median age of MIS-C cases is nine years.
20 The graph on the right shows the distribution of MIS-C
21 cases by age. 60 percent of the cases are male. And

1 among the patients with complete race and ethnicity
2 information, 32 percent are Hispanic/Latino and 30
3 percent are non-Hispanic Black. 37 percent of MIS-C
4 cases reported a pre-existing condition, and obesity
5 and chronic lung disease were the most frequently
6 reported.

7 So let's quickly summarize all of this. Here
8 are the highlights of what I have presented. As of
9 June 4th, there have been over 33 million cases of
10 COVID-19 and almost 600,000 deaths in the United
11 States. Children have lower rates of hospitalization
12 and mortality compared to adults. Children are
13 susceptible to SARS-CoV-2, though younger children with
14 infection tend to have fewer lower respiratory symptoms
15 compared to adults.

16 From prospective cohort and household
17 transmission studies, infection rates are similar
18 across age groups; children can transmit SARS-CoV-2 to
19 others and with similar efficiency as adults. MIS-C is
20 a severe complication of SARS-CoV-2 infections and has
21 had varied clinical presentations. And finally, MIS-C

1 is highest and disproportionately so among Black and
2 African American children and Hispanic and Latino
3 children. And with that, thank you very much.

4 **DR. ARNOLD MONTTO:** Thank you very much, Dr.
5 Kirking. I see Dr. Gans has her hand raised. Dr.
6 Gans.

7 **DR. HAYLEY GANS:** Thank you very much. I
8 appreciate your presentation, and I really appreciated
9 you giving us that comprehensive sort of history on
10 pediatrics.

11 I had a couple of questions because I think
12 you pointed out a very important aspect of the data and
13 that we can't clump these age groups together. I think
14 that a little more granular data needs to be, if you
15 have it, provided particularly if you take the -- so
16 the zero to five year or less than five year, whatever,
17 zero to four, also I think, is too aggregated. And so,
18 if you could take the newborn data out of that --
19 because we know that there is a lot of newborn disease
20 related to parental disease -- if you take that out,
21 can you really discuss what actually the rates are in

1 that age group without that and any predictions as the
2 adults in the childbearing age actually are vaccinated
3 and obviously wouldn't expose their newborns? That's
4 my first question.

5 My second question is can we get a little more
6 granularity about the one-year-olds? There was some
7 early data showing actually a higher rate of intensive
8 care use in that group, and it was not clear if that
9 was just severity of disease or discomfort with these
10 young children who were known to be infected with SARS-
11 CoV-2 because I think that's going to be very important
12 as we understand vaccination in these very young
13 children. Thank you.

14 **DR. HANNAH KIRKING:** Yeah, thank you for the
15 questions, and we spent a lot of time talking about
16 them here largely because the issue of disaggregating
17 age versus having numbers to show relative patterns has
18 been an ongoing challenge. I will admit that I don't
19 know that I have a strong answer to your question right
20 today in terms of disaggregating the zero to four age
21 group specifically. I will have to check with

1 colleagues and see how much they've looked at the
2 newborn disease versus the older part of that age
3 cohort and see how much more we can kind of tease out
4 of it.

5 Part of the challenge is, in our large-scale
6 surveillance data at least, getting the more granular
7 details, but we always wanted as clinicians to
8 understand or be able to make sure it's standardized
9 across the reporting is a lot harder than it might
10 seem. But, yes, I totally appreciate the need for even
11 further age disaggregates, and we'll share that back.

12 We are talking a little bit across our epi
13 taskforce here at CDC about pushing across the board.
14 You know, obviously, we don't produce all of the data -
15 - but pushing for more finely disaggregated data
16 because anyone working in pediatrics knows that, yeah,
17 a newborn is not a four-year-old and a one-year-old is
18 not a four-year-old, especially when it comes to
19 respiratory viruses.

20 **DR. HAYLEY GANS:** Thank you so much.

21 **DR. ARNOLD MONTO:** Dr. Hildreth.

1 **DR. JAMES HILDRETH:** Dr. Kirking, first, thank
2 you for this great overview and summary. What does the
3 data look like when you look at children with
4 underlying conditions like obesity or asthma or sickle
5 cell? Do the numbers change when you take that into
6 consideration? And could it be that the underlying
7 conditions in minority children are related to them
8 having a higher rate of MIS Syndrome? Is that
9 possible?

10 **DR. HANNAH KIRKING:** Could you repeat that
11 last part of the question, Dr. Hildreth?

12 **DR. JAMES HILDRETH:** Well, I was wondering
13 whether or not underlying conditions were related to
14 the higher frequency of Multisystem Inflammatory
15 Syndrome in minority children.

16 **DR. HANNAH KIRKING:** Yeah, that's a great
17 question. I think to your earlier question, children
18 that do have comorbidity are higher risk. So it's not
19 particularly surprising that's holding true from the
20 other respiratory viruses that we're more familiar
21 with, as well as in COVID-19.

1 In terms of the relationship between you said
2 with, say, race and ethnicity, comorbidities, and MIS-
3 C, I think there's a complex relationship there that
4 we're still working to understand. The first question
5 I think that we've received a lot is are the higher
6 rates of MIS-C in some of the racial minorities that we
7 see -- is that related to their risk of infection
8 alone? Or is it something on top of just infection or
9 incidence in that population? Initially, there wasn't
10 a lot of data in there, but there is a paper coming out
11 that said we're looking at our surveillance data more
12 broadly -- coming out today actually -- I didn't cover
13 it because it's embargoed. But, in short, it'll show
14 and suggest that, even if you correct for increased
15 incidence rate in Latino and Black and African American
16 children, it seems like the increased burden of MIS-C,
17 or it might be something additionally on top of that.

18 **DR. JAMES HILDRETH:** I see.

19 **DR. HANNAH KIRKING:** I'm not sure how much
20 we've been able to stratify to see how much of that
21 might be accounted for by comorbid medical conditions,

1 like you suggest. Definitely, I will take that back to
2 the individuals leading that part of it. I don't know
3 that we have the numbers yet to say strongly that we
4 can stratify by all three of those different things.

5 **DR. JAMES HILDRETH:** Thank you.

6 **DR. HANNAH KIRKING:** Sure. Of course.

7 **DR. ARNOLD MONTO:** Well, Dr. Meissner. And
8 I'd better warn everybody we're going to have to
9 restrict the questions in a little while because you're
10 really running over. Dr. Meissner, please.

11 **DR. CODY MEISSNER:** Yes. Thank you, Dr.
12 Monto. Thank you, Dr. Kirking, for such an interesting
13 presentation, and thanks to you and everyone else at
14 the CDC who is providing such remarkable data.

15 The question -- I guess it's more of a comment
16 rather than a question -- if I look at the most recent
17 rates of hospitalization among individuals under 18
18 years of age -- and this is at the CDC site -- the rate
19 is 0.4 per 100,000. That means four per million, and
20 the MMWR report that you cited ends on April 24th. If
21 you look at the slope of the curve since April 24th,

1 the number of hospitalizations is going down quite
2 dramatically.

3 So I very strongly believe we need a vaccine
4 for adolescents and children, but I want to be sure
5 that the risk of the vaccine is less than the risk of
6 hospitalization because four per million certainly does
7 not constitute an emergency, and there are significant
8 questions about the safety of this vaccine. So maybe
9 you could comment about what's happened in the six
10 weeks since that MMWR report.

11 And I will also note that MIS-C, if I could
12 read your table correctly, is getting pretty close to
13 zero cases. So as we generate herd immunity, this
14 disease is disappearing between the vaccine and natural
15 immunity. So just playing the devil's advocate here, I
16 think we need a BLA before we can approve this for
17 children. But how would you respond?

18 **DR. HANNAH KIRKING:** Yeah, I was kind of
19 expecting this question because I think it's the
20 million-dollar question right now. I think broadly you
21 described the patterns of hospitalization and MIS-C

1 that, as case counts are falling, those are also
2 falling rapidly for children. So it is not a big
3 surprise in that.

4 I think the challenge for me as I grapple, you
5 know, and as a -- by the way, background, I'm internal
6 medicine and pediatric trained -- both, but I'm making
7 some of these comparisons throughout the pandemic. But
8 I think the thing that's a challenge for me is that you
9 have a risk-benefit ratio on an individual level and a
10 risk-benefit ratio on a population level. And so I'm
11 not sure where the balance is with how you triangulate
12 both of those considerations.

13 As case counts fall, the negative outcomes
14 from COVID virus itself, whether that's cases,
15 hospitalizations, MIS-C, are also falling. Having said
16 that, there's no guarantee that the current general
17 case counts that we're seeing in the U.S. is going to
18 stay as low as it is right now. We're all hopeful,
19 myself more than anyone, that pattern does continue,
20 but we don't know. There's variables out there of
21 variance, and we can't ignore what's happening outside

1 the U.S. and how that may or may not impact our curve
2 here. So we'll see on that.

3 I think the thing that epidemiologically I
4 also have to consider are not just the risk benefits
5 from a medical standpoint, but there's also kind of the
6 societal risk-benefit, too, of what role children play
7 in the overall pandemic across society. So how to
8 balance that, I think, is much harder, and, as I was
9 trying to think about this presentation, I don't know
10 that there's a precedent for something like this and
11 the question that you all are grappling with right now.
12 Things that I would think about would be, as children
13 return to school increasingly, whether vaccinated or
14 unvaccinated and the importance of other mitigation
15 measures, I do think there are some risks for
16 transmission in any pool of people that are not
17 vaccinated, but that risk is related to background
18 community rates as well.

19 So it's a little bit of a moving target. But
20 in addition to health outcomes, vaccine outcomes, the
21 big outcome such as keeping schools open and having

1 childcare available for the rest of America and that's
2 the part that I think is tough. So I appreciate but
3 the risk-benefit ratio for the individual is rapidly
4 changing, and then that's a vital one as well but with
5 some question mark of what could happen in the upcoming
6 months. Sorry, I don't know that I have the magic
7 answer. But that's how I'm thinking about it in my
8 mind.

9 **DR. ARNOLD MONTO:** I don't think anybody has
10 the magic answer. One more question and, Dr. Kirking,
11 could you be sure to hang around until this afternoon
12 when we have our general discussion. I'm sure there
13 are going to be more questions about risk as we tackle
14 risk-benefit. So just one more question right now from
15 Dr. Levy.

16 **DR. OFER LEVY:** Hello and thank you for your
17 presentation. A few things briefly, I'd like to agree
18 with Dr. Hayley Gans that it's very important to get
19 more granularity on the pediatric data. I know you're
20 limited by what's captured, but this is a plea that we
21 partner in the future to capture with more granularity

1 the pediatric, the child immune system (audio gap) is
2 changing across days, let alone weeks, let alone months
3 and years. So just to have it in years of life really
4 does a disservice.

5 As we know, if we take sepsis as an example,
6 you take adult sepsis criteria, apply it to school-aged
7 kids, you miss a lot of sepsis. You apply the
8 pediatric, school-aged sepsis criteria to newborns, you
9 miss all of the sepsis. So there's really an ontogeny
10 here, a change with age and the immune system, and
11 we've got to really be more granular in capturing that.
12 And that would be, I think, within the spirit of the
13 Pediatric Research Equity Act, or PREA, which is
14 alluded to in the briefing document. So I just wanted
15 to put that out there.

16 The other thing is you talked a little bit
17 about seroprevalence. Did those seroprevalence studies
18 take into account that the pediatric response to
19 infection with SARS-CoV-2 is distinct? Children amount
20 to a different type of antibody response that's
21 narrower but tends to have fewer antibodies and fewer

1 types of antibodies. So those conventional sera assays
2 might not capture all of the pediatric infection, and
3 we might just be catching the tip of the iceberg.

4 **DR. HANNAH KIRKING:** Yeah, thank you for the
5 comments, definitely noted on the age disaggregation
6 and trying to get finer age groups. I 100 percent
7 agree with that, and, like I said, we had a lot of
8 discussion even upcoming to this presentation to get as
9 granular as we could and for sure this desire to even
10 go further. In terms of your second question -- remind
11 your second question. My apologies.

12 **DR. OFER LEVY:** It was with seroprevalence.
13 There's work by Dr. Farber and others published in
14 prominent journals saying that children mount a
15 different type of antibody response to this infection,
16 and the conventional assays don't always pick it up.

17 **DR. HANNAH KIRKING:** So I would wholeheartedly
18 say that there is truth to that, and that you know,
19 these seroprevalence surveys are for sure trying to
20 recognize the pattern and show the signal. I would not
21 hang my hat heavily because there's still a lot more

1 unknowns of what's not captured. Seroprevalence survey
2 of a good sample population is not perfect using a
3 nucleocapsid antibody test. On the CDC website, there
4 is a link to the broader data and to the methods that
5 that estimate includes. But I do agree with you. I
6 think it might not be telling the whole picture due to
7 differences in the immunologic response in adults and
8 kids.

9 **DR. OFER LEVY:** And finally, we don't know too
10 much about the long-term effects of the infection in
11 children. They might not manifest acute symptoms, but
12 there's more to be learned. Wouldn't there be more to
13 be learned about the long-term effect of this infection
14 early on?

15 **DR. HANNAH KIRKING:** Absolutely. (Inaudible)

16 **DR. OFER LEVY:** Thank you.

17 **DR. ARNOLD MONTA:** Okay. Well, thank you all,
18 and thank you, Dr. Kirking, and please hang around for
19 this afternoon. We're going to have a vigorous
20 discussion related to risk. Next, I'd like to ask Dr.
21 Shannon Stokley from the Associate Director of Sciences

1 Office at CDC to talk briefly about operational
2 aspects.

3

4 **CDC: OPERATIONAL ASPECTS**

5

6 **DR. SHANNON STOKLEY:** Thank you and good
7 morning and thanks for this opportunity to talk about
8 the implementation of COVID-19 vaccination for
9 adolescents in the United States.

10 So, as you're aware, after the FDA approved
11 the expansion of the emergency use authorization for
12 the Pfizer-BioNTech vaccine to be used for adolescents
13 aged 12 to 15 years, the Advisory Committee on the
14 immunization practices met on May 12th and voted to
15 recommend this vaccine for this age group. And the
16 recommendation was also published in the *Morbidity and*
17 *Mortality Weekly Report* and clinical considerations for
18 use of the vaccine were posted on the CDC website.

19 So, with the approval of the vaccine for
20 adolescents, we wanted to promote vaccination for this
21 age group as quickly and equitably as possible, and we

1 did this using a multi-pronged approach. So the plan
2 started with relying on the existing infrastructure,
3 such as mass vaccination sites and pharmacies, to open
4 up their appointment systems to include adolescents.
5 This is followed by strategically enrolling primary
6 care providers as COVID-19 vaccine providers. And then
7 finally, we planned to apply school-focused strategies,
8 such as school-located vaccination clinics during the
9 last summer and early fall as children prepare to
10 return to school. And while I present this as a phased
11 approach, in reality, in most states, these activities
12 are being implemented concurrently.

13 With a planned approach, primary care
14 providers are very important as they are trusted by
15 families and are usually the place where children
16 receive their routine vaccines. Parents have
17 confidence in their providers and prefer for their
18 children to be vaccinated in this setting. However,
19 there have been challenges with enrolling providers
20 because of the packaging of the vaccine, especially for
21 the Pfizer vaccine.

1 Many sites are not able to handle the minimum
2 order size of 1,170 doses or the newly available packs
3 of 450 doses because their patient volume may be too
4 small. So, unless the packaging becomes smaller or
5 jurisdictional immunization programs are able to break
6 down the package and redistribute vaccine in smaller
7 quantities, many providers are not interested in
8 enrolling in the program. This could have implications
9 for future vaccination efforts if the vaccine were to
10 be recommended for younger children, as we know most of
11 them prefer to receive their vaccine in the primary
12 care office.

13 Pharmacies and HRSA sites such as federally
14 qualified health centers are also very important to
15 implementation, especially in the areas that may be
16 unserved such as rural areas where they may be the only
17 source of healthcare for some people. And lastly,
18 school-based vaccination will be an important strategy
19 for vaccination as children get ready to start the new
20 school year in August and September, especially for
21 children who are not early adopters of the vaccine.

1 Many states implemented school located vaccination
2 clinics as soon as the vaccine was authorized for
3 adolescents and many more have plans to conduct them in
4 the late summer and early fall.

5 With the introduction of the vaccine for
6 adolescents, we were frequently asked about consent for
7 vaccination among minors, and the federal government
8 does not have specific requirements for medical consent
9 for vaccinations. This is determined at the state and
10 local levels, so, therefore, healthcare providers must
11 follow their state laws when providing vaccines to
12 adolescents. These laws do vary by state. For
13 example, in one state, a child aged 15 can self-consent
14 for vaccinations. Whereas, in another state, the age
15 of consent may be age 18. Again, providers must follow
16 their state laws and any policy requirements from their
17 own organization when administering the vaccine to
18 adolescents.

19 So this slide shows progress to date with
20 COVID-19 vaccinations. The line graph shows
21 vaccination coverage by age group with adolescents aged

1 12 to 15 depicted by the dashed yellow line. And, as
2 of June 7th, over 171 million individuals have received
3 at least one dose of the COVID vaccine. And that is
4 almost 52 percent of the U.S. population. Among
5 adolescents aged 12 to 15, over 3.4 million, or 23
6 percent, have received at least one dose of the COVID
7 vaccine. It's also worth noting that 39 percent of the
8 adolescents aged 16 to 17 years, shown in the solid
9 yellow line, have received at least one dose.

10 When the COVID vaccine became available for
11 adolescents, CDC also updated its guidance about the
12 coadministration of the COVID vaccine with other
13 vaccines. So now the COVID vaccine and other vaccines
14 may be administered without regard to timing, and that
15 means vaccines can be administered on the same day or
16 within 14 days of each other. When deciding whether to
17 co-administer other vaccines with the COVID-19 vaccine,
18 providers should consider if the patient is behind or
19 at risk of becoming behind on recommended vaccines, the
20 risk of vaccine-preventable diseases, and the
21 reactogenicity profile of the vaccine.

1 These updated coadministration recommendations
2 may facilitate catch-up vaccination of adolescents.
3 The pandemic has had an impact on the delivery of
4 routine vaccines in the United States. And we have
5 been monitoring routine vaccine orders through our
6 Vaccines for Children Program. As of June 6th, orders
7 are down cumulatively by 12 million doses compared to
8 what we were seeing pre-pandemic or in 2019. When we
9 look at this by vaccine, we see that vaccines primarily
10 given to adolescents have been the most impacted.

11 Compared to the pre-pandemic time, vaccine
12 orders are down 18 percent for Tdap and HPV vaccine and
13 down 12 percent for the meningococcal conjugate
14 vaccine. So, as parents are bringing their children in
15 to get a COVID vaccine, we encourage providers to
16 remind them about the importance of staying up to date
17 on routine vaccines. If vaccines can't be given during
18 the same visit, that's fine, but, if not, parents
19 should make follow-up appointments so their child can
20 get caught up if they're behind.

21 And to help inform parents about the COVID-19

1 vaccine for adolescents, CDC has developed a lot of
2 materials, both print and digit. We have specific
3 webpages devoted to the vaccination of teens. We have
4 fact sheets and also a tool kit for pediatric
5 healthcare providers for how to communicate with their
6 patients. And we also have frequently asked questions
7 and other information to dispel myths.

8 And shown on this slide is just a list of
9 resources that are available and the links. So again,
10 thank you for your attention, and I'm happy to answer
11 any questions you might have.

12 **DR. ARNOLD MONTO:** Thank you very much. Any
13 questions? Dr. Chatterjee.

14 **DR. ARCHANA CHATTERJEE:** Yes, thank you, Dr.
15 Stokley, for your presentation. I have two questions
16 for you. The first is with regard to education of
17 providers. You listed some materials that have been
18 developed for education for patients and parents. But
19 I was curious, because this is such a complex subject
20 with regard to the moving target of the pandemic
21 itself, the epidemiology, and the almost daily sets of

1 information that come out with regard to vaccine
2 adverse effects and things like that, so what is the
3 CDC doing to prepare providers should they agree and
4 should the packaging change and the vaccine become
5 available in a way that providers can actually get this
6 vaccine in their clinics?

7 **DR. SHANNON STOKLEY:** Great question. So part
8 of the onboarding process of when a provider is
9 enrolled as a COVID-19 vaccination provider, there's a
10 requirement for training, and many states have this
11 requirement before they will approve the provider. We
12 have websites with training materials specifically
13 about the vaccine products about storage, handling,
14 administration. Then, there's also materials from the
15 manufacturers themselves that we recommend they view as
16 well. We also have our clinical guidelines website
17 that is updated frequently as things evolve, and it has
18 information to help them with implementing and then
19 administering the vaccine in their practice.

20 **DR. ARCHANA CHATTERJEE:** Thank you. My second
21 question is with regard to those resources that have

1 been developed for patients and parents and guardians,
2 and that is whether they are available in multiple
3 languages that the patients may need those resources
4 in.

5 **DR. SHANNON STOKLEY:** Yeah, that's a great
6 question. So we do have resources translated into
7 several languages. I'm not sure of all the languages
8 that are available, but I know we typically have
9 translated information because we know that's important
10 to do for patients to receive information in the
11 language that is their preferred language.

12 **DR. ARCHANA CHATTERJEE:** Thank you.

13 **DR. ARNOLD MONTO:** Thank you. Dr. Perlman.

14 **DR. STANLEY PERLMAN:** Yes, so I just have a
15 short question. In looking at the vaccination rates of
16 the adolescents, is the uptake parallel to the older
17 people in the same geographical areas? Is there any
18 disparity there? Is it just the people -- in the parts
19 of the country that have higher rates of vaccination in
20 total, are those the places that have higher rates of
21 adolescent vaccination?

1 **DR. SHANNON STOKLEY:** That's a really good
2 question, and I don't know that I have the answer for
3 that. I know especially with the initial rollout of
4 the COVID-19 vaccine, the older population was
5 prioritized, and we've reached over 85 percent, I
6 think, coverage for adults aged 65 and over. I have
7 not seen analysis done where we've compared a more
8 local level coverage for the older population or adult
9 population compared to adolescents, but that's
10 something we can look into.

11 I do know that coverage increased pretty
12 quickly for adolescents aged 12 to 15 initially, and
13 we're hoping that that continues over time.

14 **DR. ARNOLD MONTO:** Thank you. Dr. McInnes.

15 **DR. PAMELA MCINNES:** I have withdrawn my hand.
16 Question answered.

17 **DR. ARNOLD MONTO:** Okay. Dr. Gans. Final
18 question.

19 **DR. HAYLEY GANS:** Thank you very much. I had
20 just one question about the coadministration. I know
21 the recommendation was highly based on the fact that

1 obviously individuals who were behind -- and we really
2 want to encourage the usual preventive measures that we
3 have, and I think that that's very, very important.
4 But I wondered if you could talk about actually on the
5 data that actually would have been the basis of those
6 recommendations.

7 There's not a lot of biological reason that
8 these immunizations necessarily would interfere with
9 other coadministered-in-children vaccinations, however,
10 we have seen obviously in other similar situations
11 where there was some effect on the vaccines that were
12 being given for their routine illnesses. We wouldn't
13 want to interact with that, such as Prevnar with
14 meningococcal, so I think that's it important to
15 realize whether this was data-driven recommendations to
16 catch people up with not a lot of biologic reason and
17 what further information would be forthcoming in this
18 arena.

19 **DR. SHANNON STOKLEY:** Yeah, my understanding
20 is the initial guidance around coadministration was
21 following the clinical trials and how they were

1 implemented. It was not necessarily due to a concern
2 of safety. It was just that's how the vaccine was
3 tested in the clinical trials. But, given that by the
4 time this was implemented for adolescents we've had
5 hundreds of millions of doses administered to adults,
6 there did not seem to be a safety issue. I might defer
7 to Dr. Amanda Cohn, our chief medical officer, to
8 perhaps provide more context for how the decision was
9 made around coadministration. I wasn't involved with
10 that decision.

11 **DR. HAYLEY GANS:** Yeah, thank you, and just it
12 wasn't really a safety concern but an immunogenicity
13 concern.

14 **DR. SHANNON STOKLEY:** Right. I don't know if
15 Dr. Cohn is available to answer that.

16 **DR. ARNOLD MONTO:** Okay. Well, thank you very
17 much. We're going now to post-authorization
18 surveillance activities, and we have a tandem
19 presentation here. First, Dr. Steven Anderson of CBER,
20 FDA, and then Dr. Tom Shimabukuro of CDC. You're on.
21 Thank you very much.

1

2

POST-AUTHORIZATION SURVEILLANCE ACTIVITIES

3

4

DR. STEVEN ANDERSON: All right. Good

5

morning. As mentioned, my name is Steve Anderson. I'm

6

the director for the Office of Biostatistics and

7

Epidemiology at the Center for Biologics. Today, I'm

8

just going to give a brief update on some of the COVID-

9

19 vaccine safety activities that we've been working

10

on.

11

We generally divide our activities into

12

passive surveillance and active surveillance. Tom

13

Shimabukuro, who follows me, is going to be talking a

14

lot about VAERS and current updates there. So I won't

15

be presenting on that topic in this presentation, but

16

what I will be focusing on is FDA's work in its active

17

surveillance monitoring programs.

18

Specifically, we've engaged two sort of data

19

systems: one is FDA is working with the CMS Medicare

20

data in collaboration with the Center for Medicare and

21

Medicaid Services. That's our big claims data system,

1 and we also have our in-house system which is the FDA
2 BEST system. And for the purposes of this
3 presentation, the focus really is going to be on the
4 claims data because it does have considerable power to
5 be used in vaccine safety surveillance and relevance
6 here.

7 So, talking just a bit a very brief overview
8 of Medicare data, the first bullet really mentions that
9 it covers 34 million persons is the database that we're
10 using for persons 65 years of age and older. I realize
11 that today's topic is adolescents and children and
12 pediatric populations, so we'll be talking about that
13 in a moment. But I just wanted to mention also aspects
14 of the systems that we're using.

15 The BEST system, the Biologics Effectiveness
16 and Safety Initiative, uses sort of large claims data
17 systems, as I mentioned, from three large data partners
18 or collaborators. They're large insurers that consist
19 of Optum, CVS Health, and then HealthCore. I just want
20 to mention in advance that they're very important
21 partners in the work that we do, and we really couldn't

1 do the work without them engaging with us. I just
2 wanted to mention an emphasis in our work on detection
3 of adverse events but also specifically rare adverse
4 events with these large data systems.

5 Talking about the specific data systems, I
6 wanted to give you a thumbnail sketch of the coverage
7 of these systems. So basically, in the third column,
8 you see the number in millions of the persons covered
9 or number of patients covered in our data system.
10 Overall, those add up to approximately 200 million
11 persons that are covered, and CMS has the bulk of those
12 as you can see. The others -- Optum, CVS Health,
13 HealthCore -- again have tens of millions of patients
14 that they cover.

15 The important thing, too, about these data is
16 the frequency which would pair up with which they're
17 updated. So, for instance, CMS is updated daily.
18 Optum is sort of every two weeks, and then some are
19 longer. They go to monthly updates.

20 Just moving onto the next slide, so I think
21 the relevant question for this audience really is how

1 many doses of vaccines are in these data systems that
2 will be relevant for analyses? So you can see the
3 total numbers displayed here. Just sort of adding them
4 up, I think CMS is 17 million, and the others go
5 between sort of 3 million for Optum, down to
6 approximately 6 million for HealthCore, and 2.6 million
7 or so for CVS Health.

8 So again, it's slightly less than 30 million
9 doses overall that we have access to for our data
10 analyses. We're actively conducting "near real-time
11 surveillance" in the first two data systems.
12 Obviously, CMS, we've been working quite a while with
13 that, and then Optum just came on in the past two
14 weeks.

15 I just wanted to mention our near real-time
16 surveillance, and you've heard us talk before at this
17 meeting about the near real-time surveillance or the
18 rapid cycle analysis. We're looking at 16 adverse
19 events, and this approach has been used previously by
20 government agencies during H1N1. So it has sort of a
21 successful track record. And it's been used probably

1 in each of the last ten years by FDA and CDC for their
2 annual monitoring of the influenza vaccine.

3 Here are sort of the 16 different adverse
4 events of special interest, and I just wanted to
5 mention initially the choices were made based on
6 adverse events that were previously studied in vaccines
7 but hadn't, sort of, had signals in the
8 preauthorization clinical studies. And now, you can
9 look through and see that some of them that we're
10 looking at, obviously, have now signaled, so for
11 instance, anaphylaxis in the upper left-hand corner.
12 But also, we added thrombosis with thrombocytopenia
13 because of the Janssen vaccine and the cerebral venous
14 thrombosis cases that were identified in the past two
15 months with that vaccine as something we're carefully
16 monitoring.

17 So those are the sort of types of outcomes
18 we're evaluating, and then this just gives you -- this
19 is a government-wide approach. FDA is working with CDC
20 and the Veterans' Administration. So this gives you a
21 coverage idea of the databases. I just wanted to point

1 to the bottom, which is those for the pediatric
2 population. So the vaccine safety data links from CDC
3 and the BEST do have coverage for those persons 17
4 years of age and younger.

5 So this just gives you an idea about our data
6 sources and their coverage. As you can see, there's
7 reasonable coverage. Again, just various partners,
8 they span from about three to four million total in the
9 populations 17 years and younger, so a reasonable
10 amount of power. Obviously, we'd always like more
11 data, but it's a reasonable amount of power to do
12 analyses.

13 And then myocarditis is going to be talked
14 about by Dr. Shimabukuro, and we thought we would at
15 least provide some results that we have from our near
16 real-time surveillance for those in both the BEST and
17 CMS systems. So, for BEST, that's the Optum data that
18 we have in persons 12 to 64 years of age. We haven't
19 observed the safety signal. This is probably after one
20 run in the past week, so these are really fresh data,
21 fresh results.

1 I just also wanted to mention that for the
2 persons 12 to 15 years of age that authorization for
3 the Pfizer vaccine was just made in, I think, the
4 second week of May, and so we wouldn't expect
5 necessarily to see that age population highly
6 represented in the data systems yet. It didn't signal
7 in CMS, as well, for myocarditis and pericarditis, but
8 it's an observation for this outcome that's been
9 observed largely in young persons 30 years of age and
10 even younger. So we didn't expect to see it in the CMS
11 populations, so it's reassuring that it didn't signal
12 in that population as well.

13 I just wanted to mention, if we do get a
14 signal, the steps we're going to be taking, and that's
15 really going to be conducting more robust
16 epidemiological studies to follow up on any potential
17 signals we identify in the near real-time surveillance
18 program. I just wanted to mention that near real-time
19 surveillance is a nice sort of screening method, but it
20 has a lot of limitations. It really doesn't account
21 for many types of confounding, and so you really need

1 to launch then a full inferential study if you do
2 signal on something so that you can better understand
3 if that signal is a true positive or not.

4 I will just point to the SCRI as a self-
5 controlled risk interval analysis, and we're probably
6 going to be relying a lot on that type of methodology
7 for our study. We have studies, sort of, that we're
8 considering obviously for CVST and the thrombosis and
9 thrombocytopenia syndrome, but also myocarditis and
10 pericarditis are also considered for studies in the
11 future. I also wanted to mention the focus on
12 subpopulations in the FDA system, so pediatrics are
13 important to us, pregnant persons, elderly, and other
14 populations.

15 I just wanted to mention that there's several
16 people involved in this work, probably at least a
17 hundred or so behind the scenes in various contractors
18 and other partners and federal partners. So this work
19 is really a huge effort by many different groups, and
20 I'm thankful for their health and collaboration in
21 accomplishing our safety surveillance work. And I'll

1 stop there. Thank you so much. I think Tom is going
2 to go directly next.

3

4 **COVID-19 VACCINE SAFETY UPDATES**

5

6 **DR. TOM SHIMABUKURO:** Hi. Can people hear me?

7 **DR. ARNOLD MONTO:** Yes, please go ahead.

8 **DR. TOM SHIMABUKURO:** Okay.

9 **DR. ARNOLD MONTO:** Yes, we can.

10 **DR. TOM SHIMABUKURO:** All right. Good morning
11 and thanks for having me. I'm going to be giving some
12 COVID-19 vaccine safety updates. The two topics I'll
13 be covering are early safety data of the Pfizer-
14 BioNTech vaccination in persons 12 to 15 years old and
15 then myocarditis and pericarditis following mRNA
16 vaccination.

17 So, to start with on the early safety data in
18 12- to 15-year-olds, I'm going to start off with data
19 from our v-safe system, which is our smartphone-based
20 active surveillance system that uses text messaging and
21 web surveys. We monitor individuals closely: daily

1 during the 0 to 7 days after vaccination and then
2 weekly up to 6 weeks and then at 3, 6, and 12 months
3 after the last vaccination. These daily surveys during
4 the first week ask about local and systemic
5 reactogenicity and other health impact events.

6 So, on May 11th, v-safe age limits were
7 expanded to allow registration down to 12 years of age
8 at dose 1, and this is primarily through parents or
9 caregivers. As of May 31st, we had just over 46,000
10 persons aged 12-to-15 years registered and submitted at
11 least one health check-in during days 0- to 7-day
12 interval after dose 1 Pfizer.

13 So here's a figure showing the top solicited
14 reactions in younger adolescents compared to older
15 adolescents. So this is looking at local and systemic
16 solicited reactions in 12- to 15-year-olds compared to
17 16- to 25-year-olds. We chose the 16- to 25-year-old
18 comparator because that's what was used in the clinical
19 trials. And, as you can see, the basic reactogenicity
20 profile of these vaccines are similar in these two age
21 groups. If anything, there's a little less self-

1 reported local and systemic reactogenicity in the 12-
2 to 15-year-old age group.

3 Now I want to move onto VAERS data, and, just
4 to remind you, VAERS is our spontaneous reporting, our
5 passive surveillance system -- I'm sorry -- our
6 national system that's comanaged by CDC and FDA. VAERS
7 accepts all reports from anyone, regardless of the
8 plausibility of the vaccine causing the event or the
9 seriousness. Its key strengths are rapid detection of
10 safety problems and the ability to detect rare events.
11 Key limitations are inconsistent quality and
12 completeness of information, reporting biases, and
13 generally an inability to determine cause and effect.

14 So here's the basic reporting of 12- to 15-
15 year-olds, again looking at 16- to 25-year-olds for
16 comparison both in numbers, and you see the numbers of
17 doses administered. Under there, I don't have this on
18 the slide, but the crude reporting rates are very
19 similar. The breakdown of non-serious adverse events
20 and serious adverse events are also similar between
21 these two age groups.

1 Here are the most commonly reported adverse
2 events to VAERS after Pfizer-BioNTech vaccination.
3 Looking at 12- to 15-year-olds and again 16- to 25-
4 year-olds for comparison, you can see the most commonly
5 reported adverse events are similar. There appears to
6 be -- and these are the top ten adverse events, and
7 these are not mutually exclusive. You can have more
8 than one adverse event in a report. There may be
9 slightly more adverse events which were indicative of
10 vasovagal reactions in the younger age group, the 12-
11 to 15-year-olds. And these are -- vasovagal are
12 syncope or presyncope-like adverse events but generally
13 fairly similar to the 16- to 25-year-old age group.

14 So, moving on to myocarditis and pericarditis
15 following mRNA vaccination, I'm going to start off with
16 VAERS data. These are preliminary myocarditis and
17 pericarditis reports to VAERS following mRNA
18 vaccination in reports with dose number documented. So
19 these had to have -- this is limited to where there was
20 a dose 1 or a dose 2 documented. And, by preliminary
21 reports, I mean reports that come to us and we detect

1 either through a search of MedDRA codes, which is the
2 coding that we use for these reports, or they're pre-
3 screened before they go through the processing
4 procedures. Because they are suggestive of
5 myocarditis, the contractor forwards those to CDC, or,
6 when we're alerted to a report from a healthcare
7 provider out there, we basically take the report then.
8 Or we go in and pull the report all based on
9 information the healthcare provider has given us.

10 So follow-up, medical record review and
11 application of the working case definition and
12 adjudication is ongoing or pending in many of these
13 reports. These are the preliminary reports. As you
14 can see, there are more reports after dose 2 compared
15 to dose 1, slightly more after Pfizer than Moderna, but
16 there has been slightly more Pfizer vaccine doses
17 administered. Also, Pfizer is the only vaccine that's
18 authorized in these younger age groups.

19 So these are the characteristics of these
20 preliminary reports, again with a dose number
21 documented. I think the take-home here is that for

1 reports occurring after dose 2, the median age is
2 slightly lower. The median time to symptom onset may
3 be a bit shorter: two days versus three days. The
4 proportion of male and female reports is different.
5 There is a higher proportion of male reports compared
6 to female reports and the dose 2 reports compared to
7 the dose 1 reports. I will say that these findings and
8 the findings on the previous slide are consistent with
9 the surveillance data that emerged from Israel and also
10 from other case series reports and from the Department
11 of Defense reports of myocarditis after mRNA
12 vaccination.

13 This analysis is limited to reports in
14 individuals 30 years and under and focuses on the
15 presenting signs and symptoms, and you can see
16 overwhelmingly chest pain was the most common
17 presenting symptom. Some patients do have dyspnea, but
18 chest pain is really the hallmark. As you can see, ST
19 or T-wave changes on an ECG and elevated troponins are
20 common. Also, a number of these individuals have
21 abnormal echocardiography or imaging studies.

1 Of these 475 reports in individuals 30 years
2 and under -- again, this is an age-limited analysis --
3 we do have outcomes or disposition on a substantial
4 number of these. So 226 of these 475 reports met the
5 CDC working case definition, and follow-up and review
6 are in progress for the remaining. 285 had a known
7 disposition. 270 had been discharged. 15 were still
8 hospitalized. Of the 270 discharged, 91 percent were
9 discharged home. Of these 270 discharged, the recovery
10 status was known for 221, and 81 percent of these 221
11 had full recovery of symptoms. And 19 percent had
12 ongoing signs or symptoms or an unknown recovery
13 status.

14 So this looks at preliminary myocarditis and
15 pericarditis reports to VAERS following just second
16 dose of vaccination, and it's looking at a 30-day
17 observation window. So again, this is limited to
18 second dose -- reports after a second dose where the
19 symptom onset was in 30 days, broken down by age
20 groups. You see the doses administered there in the
21 second column, and, on the far right-hand column, you

1 have the observed counts. These are the actual
2 preliminary VAERS reports.

3 The expected value we see in the column just
4 to the left of the observed is based on published
5 literature rates. The crude reporting rate is a simple
6 calculation. You just take the observed, divided by
7 the doses administered, multiplied by a million, and
8 you get the crude reporting rate per million doses
9 administered.

10 And you can see there's very few reports in
11 the 12- to 15-year-olds, so that data's a little bit
12 difficult to interpret. But, in the 16- to 17-year-
13 olds and the 18- to 24-year-olds, the observed reports
14 are exceeding the expected based on the known
15 background rates that are published in literature.
16 It's a bit of an apples to oranges comparison because
17 again these are preliminary reports. Not all these
18 will turn out to be true myocarditis or pericarditis
19 reports. And the expected are based on published
20 literature.

21 Of note, of these 528 reports after second

1 dose with symptom onset within 30 days, over half of
2 them were in these younger age groups, 12 to 24 years
3 old. Whereas, roughly 9 percent of the total doses
4 administered were in those age groups. So we clearly
5 have an imbalance there.

6 So now I'm going to move onto our data from
7 our vaccine safety data link. This is our population-
8 based system. It's an EHR-based system, so we have
9 complete or near-complete information on our covered
10 population, which includes nine participating,
11 integrated healthcare organizations with data on over
12 12 million persons per year.

13 So this is doses administered through May
14 29th. You can see about 4.8 million Pfizer-BioNTech
15 doses and 4 million Moderna doses. The breakdown
16 between dose 1 and dose 2, the proportions are pretty
17 similar between these two doses, so substantial amount
18 of doses administered in the vaccine safety data link.

19 This graph looks at the same data although
20 it's broken down by age group, and the take-home
21 message on this is, in these younger groups, 12- to 15-

1 year-olds and 16- to 17-year-olds, we have limited
2 doses administered, limited exposure in these age
3 groups. We have substantial exposure in the 18- to 49-
4 year-old age group but, again, in these younger,
5 adolescent age groups to date limited vaccine doses
6 administered.

7 So this is a table -- this actually shows a
8 roll-up of all the prespecified outcomes that we are
9 conducting near real-time sequential monitoring on in
10 the vaccine safety data link. I'm looking at a 21-day
11 risk interval. This is a vaccinated concurrent
12 comparator analysis. As you can see, we've had no
13 statistical signals in our primary analysis for any of
14 these prespecified outcomes. I just want to draw your
15 attention to the myocarditis/pericarditis, which is
16 highlighted. This analysis is adjusted for age by
17 five-year age groups, but this is not an age-stratified
18 analysis. So, while we have not signaled here, the
19 adjusted rate ratio is 0.94. Again, if you remember to
20 the previous slides a bit, there has been limited
21 vaccine doses administered in these younger age groups.

1 So what we did was we went and conducted an
2 additional age-stratified analysis, and this is outside
3 of the sequential monitoring, the surveillance
4 activity. This is an additional analysis, age-
5 stratified, looking in the 16- to 39-year-old age group
6 and the 21-day risk interval. As we accumulate more
7 data, we will be able to chop those ages up finer, but
8 right now, to get meaningful results, we had to use a
9 fairly wide age interval.

10 And this is by vaccine type and by dose. You
11 can see on the top there for Pfizer, the overall
12 analysis, the adjusted rate ratio is 0.49, and both of
13 the rate ratios after dose 1 and dose 2 are below one.
14 However, you see this dose effect where the adjusted
15 rate ratio after dose 1 is 0.12 and after dose 2 is
16 0.84, so there is evidence here of a dose effect.

17 If you look at Moderna, the adjusted rate
18 ratio overall is four. After dose 1, it's 1.74, and
19 what's really driving that is the dose 2 where we have
20 11 events in the risk window, and the adjusted rate
21 ratio right now is not estimable. The reason for that

1 is we have zero events in the control interval.

2 I will mention that it is early. We are still
3 accumulating follow-up time, so cases moving into the
4 control window can have a pretty substantial impact on
5 the adjusted rate ratio. But right now, there is a
6 substantial dose 2 effect for Moderna, and that is
7 probably driving the overall result from Moderna.

8 So this slide is just a straight-up rates --
9 post-vaccination rates, looking at rates after both
10 doses and then after dose 1 and dose 2 for combined and
11 by product type. What you see here, again, is this
12 second dose effect where the rate -- the
13 myocarditis/pericarditis rate per million doses
14 administered is substantially larger after second dose,
15 both in the overall analysis and by product type, both
16 for the Pfizer-BioNTech and Moderna vaccines.

17 To sum up the findings, the initial safety
18 findings for Pfizer-BioNTech vaccination in 12- to 15-
19 year-olds from v-safe and VAERS surveillance are
20 consistent with the results from pre-authorization
21 clinical trials. Analysis of VAERS preliminary reports

1 of myocarditis and pericarditis is in progress,
2 including follow up to obtain medical records to
3 complete reviews to apply the working case definition
4 to adjudicate cases. The preliminary findings do
5 suggest that the median age of reported patients is
6 younger, and the median time to symptom onset is
7 shorter among those who developed symptoms after dose 2
8 versus dose 1.

9 There's a predominance of male patients in
10 younger age groups, especially after dose 2. I would
11 just mention that myocarditis is more common in males
12 in general. The observed reports exceed expected
13 reports after dose 2 in the 16- to 24-year-old age
14 range. And limited outcome data suggest that most
15 patients had full recovery of symptoms. The early
16 vaccine safety datalink data also suggest more cases
17 after dose 2 versus dose 1, an overall rate of about 16
18 cases per million after the second dose.

19 And finally, an ACIP meeting is scheduled for
20 June 18th, next Friday. That time will update the
21 data, further evaluate myocarditis following mRNA

1 vaccination, and assess benefit-risk balance. Here's
2 some educational materials with their references. I'd
3 like to acknowledge the contributions from the
4 following investigators and their organizations. I'm
5 happy to take questions.

6 **DR. ARNOLD MONTO:** Thank you, both, very much.
7 This has become a critical issue, post-approval
8 licensure follow up for these rare side effects that
9 would not be found in the clinical trials even if we
10 went to rather large sizes. Before we get into the
11 multiple questions that are out there, could you tell
12 us, if there is an approval, let's say, down to six
13 months of age, which is on the table, what kind of
14 resources do you have for follow up in young children?
15 I don't know who wants to take that.

16 **DR. TOM SHIMABUKURO:** I can. I mean, I can
17 start that, so the VSD has -- and VAERS as a
18 spontaneous reporting or passive surveillance system
19 basically has the entire U.S. population under
20 surveillance. So anyone eligible to get a vaccine
21 could potentially report to VAERS. In those age

1 groups, it would be clearly through parents,
2 caregivers, or healthcare providers.

3 Myocarditis and pericarditis is an adverse
4 event of special interest in our monitoring, so we are
5 following up on every report of
6 myocarditis/pericarditis, especially in these younger
7 age groups to get medical records to adjudicate these
8 cases and to confirm cases. In the vaccine safety
9 datalink, our ages go down birth through older adults,
10 so we have coverage on younger individuals -- on
11 children as well.

12 **DR. STEVEN ANDERSON:** And then just to follow
13 up in the BEST systems and the data systems that we
14 have, I believe we do go down to six months of age. We
15 definitely go down to one year, but probably six months
16 as well.

17 **DR. TOM SHIMABUKURO:** I'll also mention that
18 our clinical immunizations safety assessment project
19 team is a collaboration between CDC and seven medical
20 research centers, and these individuals are available
21 to review complex cases. So complex adverse events

1 following -- cases of adverse events following
2 immunization in children, we have the ability to work
3 with our collaborators and academia to do deep dives
4 into individual case reports, including for children.

5 **DR. ARNOLD MONTO:** Right. And I think the
6 issue is sensitivity, and then you can work it out
7 after you detected some of these putative adverse
8 events. Dr. Kim.

9 **DR. DAVID KIM:** Oh, thank you very much. I
10 have a question for Dr. Anderson. You discussed the
11 BEST, as in B-E-S-T, capital letters, as a terrific
12 data source for children, older children as well as
13 younger children. I'd like to ask you, besides CVS,
14 Optum, and HealthCore, are there plans to expand the
15 surveillance database that you currently have to
16 include millions of other potential surveillance
17 opportunities?

18 **DR. STEVEN ANDERSON:** Yeah, so we have -- I
19 didn't present that. I think I presented that at a
20 past Advisory Committee meeting. I guess I should have
21 put that slide back in, but the BEST system is really

1 additional claims systems like market scans and others
2 but then also EHR systems. So we have several EHR
3 systems that we include as well, and some of those are
4 also claims and EHR-linked data systems as well. So
5 that gives us a little bit more granularity of data as
6 well. We can reshare that slide for the Committee just
7 for your information so that you have that.

8 **DR. ARNOLD MONTO:** Okay. Dr. Gans.

9 **DR. HAYLEY GANS:** Thank you so much for that
10 wonderful data. I had a question that was along the
11 same lines as Dr. Kim. So, when we add in all of the
12 systems of surveillance that are going to be considered
13 moving forward, what percentage of the pediatric
14 population actually is accounted for then when you're
15 considering the BEST and VSD and however BEST is going
16 to be expanded? That's question one.

17 **DR. STEVEN ANDERSON:** Yeah, so I don't have
18 that at my fingertips right now, but I can ask my
19 staff, and then we could provide that answer a little
20 bit later, if that's helpful.

21 **DR. HAYLEY GANS:** Okay. Wonderful. And along

1 those lines as for considering some of the
2 particularities and unique features of pediatric
3 disease, we know that there is a lot of immune-mediated
4 diseases that actually aren't on your list of diseases
5 that are being accounted for. There's very specific
6 ones that we're starting to see in the adult
7 population, the thrombocytopenia and things like that.
8 But the disease is actually slightly different in
9 pediatrics in terms of the immune-mediated disease,
10 and, therefore, the reaction to the vaccine might be
11 different. I know that VAERS will account for these
12 and you can pop them into these other systems, but I'm
13 wondering if we can actually just be proactive about
14 looking for those in our nonpassive surveillance -- so
15 in the VST and BEST -- and put those into the list of
16 signals that would be accounted for.

17 **DR. STEVEN ANDERSON:** Yeah, so, Tom? So I
18 think from our perspective that we do -- so, I'll just
19 give you an example. So we've developed sort of a
20 little more expanded list of vascular conditions that
21 we're going to be evaluating as well because of the

1 signal of the CVST and the TTS, and so I think we are
2 considering doing something similar for pediatric
3 conditions, too, because I think, as you mentioned,
4 that there's some nuances. And it's a special
5 population that we really have to consider conditions
6 that are specific to that population -- to the
7 pediatric population.

8 **DR. HAYLEY GANS:** Right. And just --

9 **DR. TOM SHIMABUKURO:** So we have the -- oh.

10 **DR. ARNOLD MONTA:** Thank you.

11 **DR. TOM SHIMABUKURO:** We have the ability to
12 add conditions --

13 **DR. ARNOLD MONTA:** Go ahead. I'm sorry.

14 **DR. TOM SHIMABUKURO:** We have the ability to
15 add prespecified outcomes in VST, and we would
16 certainly work with our colleagues in the FDA to
17 identify outcomes that we may want to consider adding.

18 **DR. STEVEN ANDERSON:** And using (inaudible) to
19 provide that advice as well.

20 **DR. TOM SHIMABUKURO:** Mm-hmm.

21 **DR. ARNOLD MONTA:** Right. Dr. Meissner.

1 You're on mute, Dr. Meissner.

2 **DR. CODY MEISSNER:** Thank you. Can you hear
3 me now?

4 **DR. STEVEN ANDERSON:** Yes.

5 **DR. CODY MEISSNER:** Yes. I would like thank
6 both Dr. Anderson and Dr. Shimabukuro for fascinating
7 presentations, and, Dr. Shimabukuro, your presentations
8 are always crisp and informative. Thank you both for
9 all of the time that you spent in this critical area.

10 So I'd like to go back to the myocarditis
11 issue because I think that's going to be very relevant
12 for adolescents and children when we're weighing the
13 benefit of risk. I mean, I can't help but be struck by
14 the fact that it occurs more commonly after a second
15 dose, as a pretty specific interval of time. It's
16 primarily after the mRNA vaccines as far as we know.

17 We know that there's consistent age. There's
18 a lack of alternative explanations, even though these
19 patients have been pretty well worked up. And it's a
20 widespread occurrence because Israel, as you said, has
21 found a pretty similar situation.

1 So the question that I would like for you to
2 clarify is can you restate the rates of occurrence of
3 vaccine-induced thrombosis, thrombocytopenia that
4 occurs in women in their 30s and 40s, and the rate that
5 you suggested for the occurrence of myocarditis that's
6 occurring in adolescents and young children?

7 **DR. TOM SHIMABUKURO:** So the first question is
8 the rates of TTS in the high-risk strata. Is that what
9 you're asking, Dr. Meissner?

10 **DR. CODY MEISSNER:** Yes, sir.

11 **DR. TOM SHIMABUKURO:** So the highest rates are
12 in younger women, and I don't remember exactly what the
13 age breakdown is. I believe it's the 30 to 39 and 40
14 to 49. It ranges from around 11 to 12 per million in
15 that group to around 9 to 10 per million in the 40 to
16 49.

17 At this point, I think we're still learning
18 about the rates of myocarditis and pericarditis. We
19 continue to collect more information both in VAERS and
20 continue to get more information in VSD. I think as we
21 gather more information, we'll begin to get a better

1 idea of the post-vaccination rates and hopefully be
2 able to get better and more detailed information by age
3 group.

4 I'll say it's still early. The authorization
5 and the recommendation for the 12- to 15-year-olds was
6 in mid-May, and immunization of these older adolescents
7 probably didn't really get going till later in the
8 vaccination program. So we're still gathering
9 information. You know, I believe that we will
10 ultimately have sufficient information to answer those
11 questions. I will mention that there will be an ACIP
12 meeting next Friday where we'll have updated
13 information from the information I've presented today,
14 and that will be put in the context of benefit and
15 risk.

16 **DR. CODY MEISSNER:** So the risk of myocarditis
17 in the high-risk adolescents is on the same order of
18 magnitude of the risk of VITT, at least based on our
19 available data. Is that correct?

20 **DR. TOM SHIMABUKURO:** I wouldn't be
21 comfortable comparing those two outcomes. They are

1 fundamentally different outcomes, and I think with TTS,
2 I think we had strong evidence of a causal relationship
3 fairly early on after that vaccine started to be used.
4 I think now we're still gathering information on
5 myocarditis, still assessing the risk, and I think
6 there is still more work to be done and more
7 information and data to be analyzed for myocarditis.
8 I'm not sure that we want to compare those two outcomes
9 -- fundamentally different and really in different age
10 groups and different strata as well.

11 **DR. CODY MEISSNER:** Yeah, my thought was
12 should this be included in informed consent? Because
13 there is -- I think it's hard to deny that there's some
14 event that seems to be occurring in terms of
15 myocarditis, so that was my thought, but thank you very
16 much for your answer.

17 **DR. STEVEN ANDERSON:** In the Israel study, I
18 think the rate was 1 per 6,000 was recorded and then
19 specifically in that male population 16 to 24 years of
20 age, and that's the posted result. So that at least
21 gives you an idea. That may be an overestimate for our

1 population, but that gives you a better estimate at
2 least for that population.

3 **DR. TOM SHIMABUKURO:** I'll mention on my
4 slides that we do have links to information on
5 myocarditis and pericarditis, both for healthcare
6 providers and for the general public. So we're
7 committed to timely communication and transparency and
8 communication.

9 **DR. CODY MEISSNER:** Thank you both.

10 **DR. ARNOLD MONTA:** Thank you. There is just
11 time for two more questions. We're already eating into
12 our major question and answer period. Dr. Portnoy.

13 **DR. JAY PORTNOY:** Great. Thank you very much
14 for this presentation. It was excellent, and I want to
15 comment about the v-safe program. Because every time I
16 filled out my v-safe thing, I felt really good that I
17 was contributing to the process. It was a really well
18 done and well-executed program.

19 The question I have is about the rate of these
20 adverse events in patients who had the vaccines, and
21 how does that compare to the rates of the same

1 reactions in unimmunized individuals who actually get
2 infected by COVID? When I'm talking to my patients
3 about getting the vaccine, they want to know what the
4 risk is of getting the vaccine, but they also want to
5 know what the risk is if they don't get the vaccine and
6 get infected by COVID. So is there a way that you
7 could compare these risks of these reactions to the
8 vaccinated patients versus if you get infected?

9 **DR. TOM SHIMABUKURO:** I think what you're
10 getting at is a benefit-risk assessment.

11 **DR. JAY PORTNOY:** Yes. Exactly.

12 **DR. TOM SHIMABUKURO:** And I'll have to say
13 that that is going to be the topic of the ACIP meeting
14 next Friday where the folks in the epi groups will talk
15 about national disease outcomes and put that in the
16 context of benefit and risk with respect to
17 vaccination.

18 **DR. JAY PORTNOY:** Because obviously, vaccines
19 have a risk of adverse events, but, if they're a lot
20 lower than the risk of the infection, then the risk-
21 benefit is still worth getting the vaccine. Thank you.

1 **DR. TOM SHIMABUKURO:** Mm-hmm.

2 **DR. ARNOLD MONTO:** Right. Finally, Dr. Offit.

3 **DR. PAUL OFFIT:** Thank you. This question is
4 for Dr. Shimabukuro. Tom, we also see troponin leak in
5 patients who have MIS-C where clearly that's immune-
6 mediated, and then usually by the time you've seen
7 this, the infection is resolved. That also appears to
8 be true here sort of amplified by the fact it is a
9 second dose rather than -- more of a second dose than a
10 first-dose phenomenon. So, in both cases, it seems to
11 be an immune-mediated effect that's causing myocardial
12 involvement. Do you have any thoughts as to what the
13 pathogenesis of that is, or are we going to wait until
14 the ACIP has this discussion on the 18th?

15 **DR. TOM SHIMABUKURO:** There are discussions
16 about the potential pathogenesis of this condition. I
17 can't give you an answer right now on pathogenesis. I
18 do want to say that for the data that we presented, we
19 specifically excluded MIS-C cases because we think
20 that's fundamentally different than these myocarditis
21 cases, which the patients tend to have just

1 myocarditis, not the other manifestations of MIS-C, and
2 tend to do quite well with conservative treatment.

3 **DR. PAUL OFFIT:** Thank you.

4 **DR. ARNOLD MONTO:** Okay. Thank you all very
5 much. We're going to take a well-earned break. We'll
6 resume, since we're running about 20 minutes late, at
7 10:55 Eastern. 10:55 Eastern.

8

9 **[BREAK]**

10

11 **FDA PRESENTATION - CONSIDERATIONS ON DATA TO SUPPORT**
12 **LICENSURE AND EMERGENCY USE AUTHORIZATION OF COVID-19**
13 **VACCINES FOR USE IN PEDIATRIC POPULATIONS**

14

15 **MR. KAWCZYNSKI:** All Right, welcome back.
16 Arnold, take it away.

17 **DR. MONTO:** Next we're going to hear the FDA
18 presentation, Considerations on Data to Support
19 Licensure and Emergency Use Authorization of COVID-19
20 Vaccines for Use in Pediatric Populations. And we have
21 presenting Dr. Doran Fink of CBER. Dr. Fink.

1 **DR. FINK:** Good morning. Welcome back, to the
2 committee, and to members of the public who are
3 watching. I'm Doran Fink. I'm the Deputy Director for
4 Critical Review in the Division of Vaccines and Related
5 Products Application, Office of Vaccines Research and
6 Review, in CBER FDA.

7 Dr. Monto already introduced the title of my
8 talk, so I'll proceed to the overview for my
9 presentation. This will follow Section 2, of the FDA
10 briefing document for this VRBPAC meeting, very
11 closely. I'm going to begin by discussing some general
12 considerations for development of vaccines in pediatric
13 populations, and data to support licensure or emergency
14 use authorization, as these data might apply to COVID-
15 19 preventive vaccines.

16 The second part of my talk will then address
17 specific considerations for data to support licensure
18 or emergency use authorization of COVID-19 vaccines for
19 use in adolescents and in younger pediatric age groups
20 respectively.

21 As Dr. Naik mentioned in his introductory FDA

1 talk this morning, there is intense interest in
2 pediatric development of COVID-19 vaccines. This
3 interest is not only due to public health concerns, but
4 also because addressing pediatric development of COVID-
5 19 vaccines would be a legal requirement for any
6 vaccine manufacturer pursuing licensure in the U.S.

7 As required by the Pediatric Research Equity
8 Act, or PREA, a vaccine manufacturer applying for FDA
9 licensure of a COVID-19 preventive vaccine would need
10 to provide, at the time of the licensure application
11 for use in adults and for all pediatric age groups from
12 birth through less than 17 years, one of the following:
13 either assessments of vaccine safety and effectiveness,
14 from clinical trials in pediatric subjects or other
15 sources; or, a request for deferral of studies to
16 assess vaccine safety and effectiveness in pediatric
17 age groups to be completed at a later date; or, request
18 for a waiver, with an appropriate justification, from
19 the PREA requirement to provide these assessments.

20 Now, those of you who are astute observers
21 will probably recognize that PREA covers age groups

1 from birth through less than 17 years. However, we are
2 asking the VRBPAC to focus their discussion today on
3 pediatric age groups from six months to less than 18
4 years of age.

5 Why the differences? Well, first of all the
6 typical development plan for vaccines in transition
7 from adult development to pediatric development
8 typically includes a cutoff at 18 years of age. So
9 even though the upper age limit that is covered by the
10 Pediatric Research Equity Act is less than 17, we're
11 going to follow the trajectory of typical pediatric
12 vaccine development, up to age less than 18 years.

13 At the lower end of the pediatric age range,
14 PREA covers down to birth. However, there are some
15 specific considerations for younger infants, birth
16 through less than six months of age, that are
17 particularly complex. For example, it's possible that
18 maternally derived antibodies transferred via the
19 placenta could provide protection in infants following
20 either vaccination of pregnant women, or natural
21 infection of women of childbearing potential.

1

2 Secondly, for pediatric development of
3 vaccines for use in very young infants, there's the
4 need to considered concomitant administration with
5 multiple and very closely staged routinely administered
6 immunizations.

7 Finally, the typical age de-escalation
8 approach to pediatric development starts with the
9 oldest age groups, i.e., adolescents, and then proceeds
10 downward, carefully evaluating for vaccines safety and
11 also dose ranging to ensure the doses studied in
12 pediatric age groups are well tolerated. Thus, the
13 youngest age group of birth to less than six months of
14 age, if pediatric development proceeds in that age
15 group at all, is typically the last to be initiated.
16 At this time we're not aware of any studies that have
17 been initiated involving infants less than six months
18 of age.

19 So, because of the need for further discussion
20 about trial design and other specific considerations
21 for this youngest age group, we are, therefore, going

1 to focus our discussion starting with six months of
2 age.

3 We're going to cover both data to support
4 licensure, as well as data to potentially support
5 extending an emergency use authorization of a COVID-19
6 vaccine for use in pediatric age groups, prior to
7 licensure of the vaccine for use in those age groups.

8 Extension of an emergency use authorization
9 for pediatric age groups could be considered as needed
10 to address the ongoing (inaudible) COVID-19 public
11 health emergency. However, such an extension would
12 rely upon a determination that all statutory criteria
13 for emergency use authorization are met. Including
14 that there are sufficient data to support the vaccine's
15 known and potential benefits outweighs its known and
16 potential risks in the age group, or age groups, being
17 considered for emergency use authorization.

18 And so consistent with FDA's approach to
19 emergency use authorization, as outlined in our
20 guidance document, an emergency use authorization for
21 use in millions of healthy pediatric vaccine recipients

1 would rely on data from at least one well-designed
2 clinical trial that demonstrates the vaccine's safety
3 and effectiveness in a clear and compelling manner.

4 And to reiterate, today VRBPAC is asked to
5 discuss general considerations for safety data,
6 specifically safety data to support licensure or
7 emergency use authorization of COVID-19 vaccines for
8 use in pediatric age groups from six months to less
9 than 18 years.

10 We recognize that the universe of
11 considerations around pediatric COVID vaccine
12 development, licensure, and emergency use authorization
13 is not limited to safety data. However, to focus the
14 discussion, we are asking that the VRBPAC not discuss
15 product specific considerations, including data to
16 support initiation of pediatric trials for specific
17 COVID-19 vaccines, or approaches to enrollment of
18 specific age groups. These are discussions that FDA is
19 having, and are ongoing, with vaccine manufacturers,
20 and rely upon the protections afforded by federal
21 regulations for protection of pediatric research

1 subjects.

2 We also recognize that for public health and
3 practical reasons, there is intense interest in
4 developing data to inform concomitant use of COVID-19
5 vaccines with other vaccines that are routinely
6 recommended for use in pediatric populations.

7 We could not agree more with the importance of
8 these data, and therefore, we encourage vaccine
9 manufacturers to develop these data in their pediatric
10 studies. However, in keeping with regulatory
11 precedent, data to inform concomitant use of COVID-19
12 vaccines with other routinely recommended immunizations
13 would not be a requirement to support either licensure
14 or emergency use authorization for use in pediatric age
15 groups.

16 I'd like to turn now to some more specific
17 considerations regarding demonstrating vaccine
18 effectiveness and demonstrating vaccine safety in
19 pediatric populations. As outline in the VRBPAC
20 briefing document, there are several potential options
21 for demonstrating vaccine effectiveness in pediatric

1 populations.

2 One option is a clinical endpoint efficacy
3 trial in which the effectiveness of the vaccine is
4 directly demonstrated for preventing SARS-CoV-2
5 infection and/or disease. The briefing document goes
6 into some detail about various considerations for
7 endpoints and success criteria for (inaudible) efficacy
8 trials. However, FDA acknowledges that, based on
9 current COVID-19 epidemiology, conducting clinical
10 endpoint efficacy trials that are adequately powered
11 for formal hypothesis testing in pediatric population,
12 specifically in those age groups for which disease
13 incidents is lowest, may be very difficult if not
14 infeasible.

15 Therefore, my presentation will focus on the
16 second option, which is the immunobridging trial. This
17 is a well-established approach to demonstrating
18 effectiveness in pediatric age groups, based on first
19 of all, prior demonstration of vaccine efficacy in a
20 comparative population, typically adults, followed by
21 comparison using statistical hypothesis testing, in a

1 very rigorous manner, of immune responses elicited by
2 the vaccine in a pediatric age group as compared to the
3 group in the population in which vaccine efficacy has
4 previously been demonstrated. This immunobridging
5 approach presumes that disease pathogenesis, the
6 mechanism of protection, are similar across the age
7 groups being compared.

8 Now, clearly COVID-19 disease outcomes are
9 different between pediatric age groups and adults and
10 even across pediatric age groups. And there may be
11 differences in SARS-CoV-2 and COVID-19 vaccine
12 immunology across age groups. However, based on
13 available data, FDA considers that mechanisms for
14 disease pathogenesis and protection elicited by COVID-
15 19 vaccines are sufficiently similar across age groups
16 to allow for this immunobridging approach.

17 Immunobridging trials should be adequately
18 powered to demonstrate statistically non-inferior
19 immune response in the pediatric age group being
20 evaluated as compared to the group in which vaccine
21 efficacy was previously demonstrated.

1 As an example of a comparative group, my
2 presentation list adults 18-to-25 years of age. We
3 would typically support use of a younger adult age
4 group, as opposed to for example elderly adults being
5 included in the comparative population, to mitigate
6 against bias that would favor a more robust immune
7 response in a younger population (inaudible) pediatric
8 age group that could bias the study in favor of
9 success.

10 Immune response biomarkers that are selected
11 for immunobridging trials should be clinically relevant
12 to the disease process, and, to the suspected or
13 demonstrated mechanism of protection. However, they do
14 not need to be established scientifically to predict
15 protection against infection or disease at a given
16 threshold.

17 We have a number of examples of previous
18 vaccines that have been approved for use in pediatric
19 populations, based upon immunobridging, using immune
20 response biomarkers that have not been established to
21 predict protection against infection or disease at a

1 given threshold. Some examples that were mentioned in
2 the briefing document include HPV vaccines and oral
3 cholera (inaudible) vaccine.

4 Based on currently available data, FDA
5 considers the neutralizing antibody responses can be
6 used for immunobridging trials of COVID-19 vaccines.
7 And we would consider that these trials should evaluate
8 both geometric mean titers and seroresponse rates, to
9 evaluate the full range of neutralizing antibody
10 responses with seroresponse rates evaluating the lower
11 end of the response range, and geometric mean titers
12 evaluating the higher.

13 Of course, if an immune response biomarker
14 were established to predict protection at a given
15 threshold, then an immunobridging trial could proceed
16 based on evaluation of seroresponse rates alone. And
17 in this case those seroresponse rates would be
18 seroprotection rates.

19 Now even though we recognize that it may be
20 difficult, if not infeasible, to conduct an adequately
21 powered clinical endpoint efficacy trial with formal

1 hypothesis testing, an immunobridging trial should plan
2 for efficacy endpoint analyses as feasible to support
3 the immunobridging data. These clinical endpoint
4 efficacy analyses can be descriptive. They don't need
5 to involve formal statistical hypothesis testing.

6 FDA would expect that any immunobridging
7 trial, designed to support either licensure or
8 emergency use authorization of a COVID-19 vaccine in
9 pediatric age group, be scientifically rigorous as is
10 our usual standard for data to support pediatric use of
11 any preventive vaccine.

12 Here are some features of scientifically
13 rigorous pediatric immunobridging trials. First of
14 all, we would expect that the pediatric and adult
15 comparator groups are similar with respect to
16 demographic variables, other than age. And as I
17 mentioned on a previous slide, the age differences
18 should be minimized to the extent possible. They
19 should be similar with respect to baseline health
20 status. And they should be similar with respect to
21 prior exposure to SARS-CoV-2 infection or vaccination.

1 For the cleanest data ideally both groups, the
2 pediatric group and the adult comparator group, would
3 be naïve to both SARS-CoV-2 infection and vaccination.
4 We recognize, given the trajectory of the pandemic and
5 uptake of COVID-19 vaccines, it could be very difficult
6 to conduct a trial in which a naïve pediatric group is
7 enrolled concurrently with a naïve adult comparator
8 group. And for this reason, the comparator group does
9 not necessarily need to be enrolled concurrently in the
10 same trial with the pediatric group being evaluated, as
11 long as there are adequate measures in place to
12 mitigate against introduction of bias in terms of
13 selection of participants and conduct of the
14 immunogenicity assays and analysis.

15 We would expect that a sufficiently stringent
16 statistical success criteria be used. And, typically,
17 what FDA has accepted for immunobridging trial would be
18 non-inferiority margins of 1.5-fold for geometric mean
19 titers, and -10 percent for seroresponse rates. We are
20 open to the possibility of alternative statistical
21 success criteria, but only if adequately justified.

1 Finally, we recognize that pediatric
2 development will necessarily involve ensuring that
3 dosage evaluated, in pediatric study subjects, are safe
4 and well tolerated. And, therefore, a dose escalation
5 approach, that would be typical of pediatric
6 development, would also typically be accompanied by
7 dose ranging to select a dose that is well tolerated in
8 a given age group.

9 When contemplating an immunobridging approach
10 to infer effectiveness, not only in a different age
11 group than that for which the vaccine has been
12 demonstrated to be effective, but also at a different
13 and likely lower dose level, we would need to ensure
14 that the data to support the use of the selected immune
15 biomarkers are sufficient that we have sufficient
16 confidence in those data to support the immunobridging
17 approach, not only to a different age group but also to
18 a different dose level.

19 Once again, this does not necessarily mean
20 that we would require an immune marker that is
21 established to predict protection at a given threshold.

1 This would not necessarily be a requirement.

2 I would like to turn now to evaluation of
3 vaccine safety. And, as stated in our June 2020
4 guidance on development and licensure of vaccines to
5 prevent COVID-19, the general approach to safety
6 evaluation of COVID-19 vaccines should be no different
7 than for other preventive vaccines for infectious
8 diseases. And this is true for pediatric populations
9 as well.

10 We would expect that pediatric vaccine trials
11 with COVID-19 vaccines assess common injection site and
12 systemic adverse reactions that would be solicited for
13 at least one week after each study vaccination. We
14 would expect that such trials would collect and
15 evaluate all adverse events for at least one month
16 after each vaccination. And that they would evaluate
17 all serious other medically attended adverse events,
18 and adverse events of special interest, which would
19 include cases of severe COVID-19 and MIS-C should they
20 occur, collected for the duration of the study.

21 The study duration should be at least six

1 months and ideally one year or longer after the last
2 vaccination. And current pediatric COVID-19 vaccine
3 trials in progress are operating consistent with this
4 expectation.

5 Finally, we would expect inclusion of a
6 comparator group for safety, ideally one that receives
7 a placebo control, followed for as long as is feasible.
8 We recognize that some adverse reactions, for example,
9 myocarditis or pericarditis as discussed earlier today,
10 may be too infrequent to detect in a safety database of
11 typical size for pre-licensure clinical trials, even a
12 safety database that includes tens of thousands of
13 pediatric trial participants.

14 COVID-19 vaccines represent a novel class of
15 preventive vaccines, with some candidates also
16 representing novel vaccine platforms. Consistent with
17 our approach to other vaccines for infectious diseases,
18 we would expect an overall safety database for
19 pediatric age groups from six months to less than 18
20 years to generally approach approximately 3,000 trial
21 participants vaccinated with the age-appropriate dosing

1 regimen intended for licensure or authorization and
2 followed for at least six months after completion of
3 the vaccination regimen.

4 This is a general consideration and does not
5 account for any specific safety concerns that might
6 arise during clinical development either in adults or
7 in pediatric age groups that would warrant evaluation
8 in a larger pre-licensure safety database if feasible.

9 Now, Dr. Meissner, earlier in the day asked a
10 question about pediatric safety databases for other
11 recently approved vaccines in the U.S. And, I'll
12 reiterate here that in cases where there's been
13 available data in a large number of adults and an
14 immunobridging approach has been used, to support and
15 demonstrate effectiveness in pediatric populations, the
16 pediatric safety database that FDA has accepted is
17 consistent with what is outlined on this slide.

18 In the example of Gardasil, the first FDA
19 approved HPV vaccine, the pre-licensure safety database
20 for ages nine to 17 years was slightly over 3,000. And
21 this was an approval for use in that pediatric age

1 group that was concurrent with approval for use in
2 young adults ages 18 through 26. So at that point we
3 didn't have much in the way -- we didn't have anything
4 in the way of post-licensure safety data in adults.
5 For other vaccines that have FDA approval for use in
6 pediatric age groups, based on immunobridging to infer
7 effectiveness, we have allowed a pediatric safety
8 database of considerably less, around 1,500 for
9 Japanese encephalitis vaccine, and slightly more than
10 500 for oral cholera vaccine.

11 Regardless of the overall size of the
12 pediatric (inaudible) (audio skips) safety database, we
13 would not necessarily expect the entire safety database
14 to be available for FDA review at the same time. As I
15 mentioned before, pediatric development typically
16 follows an age de-escalation approach that allows for
17 safety data and dose ranging in order age groups to then
18 inform selection of an appropriate dose for younger age
19 groups.

20 So FDA had in the past, and would for COVID-19
21 vaccines, consider age group specific safety data for

1 either licensure or emergency use authorization, if
2 appropriate, based on benefit/risk considerations.
3 There would need not involve review in consideration of
4 the entire pediatric safety database from six months to
5 less than 18 years at the same time.

6 However, this overall safety database should
7 include adequate representation across age groups,
8 especially younger age groups that are less
9 physiologically similar to adults. And we would expect
10 an adequate number of vaccine recipients in each
11 specific age group, and I will get into that in a later
12 slide.

13 In addition to pre-licensure clinical trials
14 safety data, we would also base any licensure or
15 emergency use authorization decision on data that also
16 considers safety experience from clinical trials and
17 post-licensure and/or post-authorization use in older
18 age groups. For example, younger adults for use in
19 adolescents, and younger adults and adolescents for use
20 in younger pediatric age groups. These safety data in
21 older age groups would be considered in the risk

1 assessment for each pediatric age group.

2 That finishes my discussion of general
3 considerations, and so now I'm going to turn to more
4 specific considerations for licensure or emergency use
5 authorization of COVID-19 vaccines for use in specific
6 pediatric age groups, starting with adolescents.

7 We would expect that evidence of
8 effectiveness, for use in adolescents, be derived from
9 an immunobridging trial that is adequately powered and
10 that also include descriptive clinical endpoint
11 efficacy data as available.

12 A safety database that could support licensure
13 for use in adolescents would include at least a
14 thousand younger adolescents, i.e., those 12 to less
15 than 16 years of age, and additionally, up to several
16 hundred older adolescents, i.e., those 16 to less than
17 18 years of age, each with a median follow up of six
18 months after completion of the vaccination regimen.

19 This total exposure safety database would be
20 supplemented by an adequately size control group,
21 ideally one that has received a placebo control, as

1 well as available safety data from clinical trials in
2 post-authorization or post-licensure use in adults.

3 In the event that older adolescents, those 16
4 to less than 18 years of age, had been included in an
5 adult efficacy trial, we would consider inclusion of
6 that older adolescent age group in an original
7 licensure application previous in adults, with
8 subsequent consideration of licensure for use in the
9 younger adolescent age group based on immunobridging
10 and safety data.

11 An emergency use authorization of a COVID-19
12 vaccine for use in adolescents, similar to licensure,
13 will require evidence of effectiveness. And for this
14 we would also expect this evidence of effectiveness to
15 come from an adequately powered immunobridging trial
16 with descriptive clinical endpoint efficacy data as
17 available. We would expect the same size clinical
18 trial safety database as for licensure, although, with
19 a somewhat shorter overall duration of follow up, in
20 order to address the emergency situation.

21 We have considered that a median follow up two

1 months, after completion of the vaccination regimen,
2 would be sufficient to support emergency use
3 authorization of a COVID-19 preventive vaccine in
4 adolescents provided that there are no safety issues
5 that would warrant a longer period of follow up.

6 This consideration accounts for physiologic
7 similarity between adolescents and younger adult age
8 groups, similarity in COVID-19 disease incidents
9 between adolescents and younger adult age groups. And
10 also takes into consideration that there would be
11 safety data available in many thousands of adults,
12 specifically many thousands of younger adults that
13 would help to inform risk in adolescents.

14 This approach is reflected by FDA's May 2021
15 extension of emergency use authorization for use of the
16 Pfizer-BioNTech COVID vaccine in adolescents 12 to less
17 than 16 years of age. Also reflected by the precedent
18 with the Pfizer-BioNTech vaccine, FDA would consider
19 including the older adolescent age group, those 16 to
20 less than 18 years of age, in an emergency use
21 authorization for use in adults, if older adolescents

1 in this age group had been included in the adult
2 efficacy trial.

3 Turning now to data considerations for younger
4 age groups, again, we would expect that licensure of a
5 COVID-19 preventive vaccine for use in younger
6 pediatric age groups could be supported by evidence of
7 effectiveness from an immunobridging trial, one that is
8 adequately powered, and also includes descriptive
9 clinical endpoint efficacy data as available.

10 Following the typical age de-escalation
11 approach in pediatric development, we would expect
12 multiple immunobridging trials each independently
13 powdered for the age group involved. The examples that
14 we gives in this presentation, and in our discussion
15 questions, are six to less than 12 years, two to less
16 than six years, and six months to less than two years.

17 There's nothing magical about these age
18 cutoffs. They merely reflect generally what FDA has
19 discussed with individual vaccine manufacturers in
20 terms of their approach to pediatric development and
21 age de-escalation. And there are slight differences

1 across the various pediatric development programs for
2 COVID-19 vaccines that are currently underway.

3 We would expect for each of these age groups,
4 no matter what the exact age cutoff is, a safety
5 database of at least a thousand vaccine recipients,
6 vaccinated with the age-appropriate dosing regimen
7 intended for licensure, and with a median follow up of
8 at least six months after completion of the vaccination
9 series. Plus, as was the case with adolescents, and
10 also for that matter with adults, an adequately sized
11 control group, ideally receiving a placebo control, as
12 well as consideration of all available safety data of
13 clinical trial experience, and experience with post-
14 authorization or post-licensure use in older age
15 groups, those being adolescents and adults.

16 Consideration of emergency use authorization,
17 of COVID-19 vaccines for use in these younger pediatric
18 age groups, we believe is more complex. In
19 consideration of whether to consider in the first place
20 extending an emergency use authorization of a COVID-19
21 vaccine for use (audio skips) age group, would include

1 trajectory of COVID-19 epidemiology in the U.S., a
2 burden of COVID-19 disease in these younger age groups,
3 and therefore, the anticipated benefits of making the
4 vaccine available. And finally, the robustness of
5 available safety data, including from clinical trials
6 in the specific age groups as well as experience in old
7 age groups, to inform risk assessment.

8 Because of all of these considerations, and
9 age groups specific differences, a conclusion of clear
10 and compelling safety and effectiveness to support
11 emergency use authorization, and, indeed, the need for
12 emergency use authorization, may be less certain for
13 younger pediatric age groups than for adolescents and
14 adults. This is one of the questions on which we would
15 like to receive input from the VRBPAC today.

16 If it were determined that there were a need
17 for emergency use authorization of a COVID-19 vaccine
18 for use in younger pediatric age groups, data that
19 could potentially support such an emergency use
20 authorization, in an age group specific manner, would
21 include, first, evidence of vaccine effectiveness from

1 an adequately powered immunobridging trial, plus
2 descriptive clinical endpoint efficacy data as
3 available, and would also include the same size
4 clinical trial safety database, as that which would
5 support licensure, with a sufficient duration of follow
6 up to assess risk.

7 What would be a sufficient duration of follow
8 up? Well, you'll notice that we did not make a
9 proposal here on the slide. And this is another
10 question that we would like the VRBPAC to discuss and
11 provide input on today. Considerations for sufficient
12 duration of follow up, to potentially support emergency
13 use authorization in these younger age groups, would
14 need to consider the anticipated benefits in these age
15 groups, and in an age group specific (inaudible) manner
16 would need to consider available safety data from
17 clinical trials in post-licensure or post-authorization
18 experience in older age groups, and would also need to
19 consider physiologic differences between younger
20 pediatric age groups versus older age groups and
21 adults. We recognize that these are very complicated

1 considerations and we look forward to the discussions
2 this afternoon.

3 To remind you of the discussion items, first
4 of all we would like the VRBPAC to discuss that in the
5 situation where provided there is sufficient evidence
6 of effectiveness to support benefit of a COVID-19
7 preventive vaccine for pediatric age groups, please
8 discuss the safety data, including database size and
9 duration of follow-up, that would support, first of
10 all, emergency use authorization, and second of all,
11 licensure. We would like the discussion to consider
12 age group specific factors.

13 Secondly, in the situation where there is
14 sufficient evidence of effectiveness to support benefit
15 of a COVID-19 preventive vaccine for adolescents 12 to
16 less than 18 years of age, we would like the committee
17 to discuss the safety data, including the database size
18 and duration of follow up, that would support
19 licensure.

20 And finally, we would like the committee to
21 discuss studies following licensure, and/or issuance of

1 an emergency use authorization, to further evaluate
2 safety and effectiveness of COVID-19 vaccines in
3 different pediatric age groups.

4 Thank you. And I'm happy to take any
5 questions.

6

7 **ADDITIONAL Q & A SESSION**

8

9 **DR. MONTO:** Thank you so much, Dr. Fink. As
10 usual a very clear presentation of topics in which
11 there are not so clear answers. We have about 10
12 minutes for questions right now. And then we're going
13 to again ask you to please stay with us this afternoon,
14 as I know you will, because I'm sure there will be
15 questions that come up. During our discussion we're
16 not going to have the time to really be able to answer
17 everybody's questions, which starts with Dr. Kurilla.

18 **DR. KURILLA:** Thank you. Great presentation,
19 Doran. The question I have is I'm struggling a little
20 bit with the immunobridging. You made the point that
21 we don't always necessarily have to know the correlate

1 (inaudible) of protection and then in this case we
2 don't know the correlate of protection. But, I'm a
3 little concerned with the fact that we're talking about
4 a vaccine that was derived from a viral sequencing that
5 is now well over a year and a half old. And that
6 sequencing -- that strain is actually not circulating
7 any more. And so when you're trying to immunobridge
8 immune responses against the vaccine, to clinical
9 benefit, you're looking at clinical benefit -- clinical
10 efficacy that was derived from a different set of
11 circulating strains.

12 And so I'm having a little trouble as to how
13 we can actually estimate the likelihood of ongoing
14 protection from what is now a new set of circulating
15 strains going forward.

16 **DR. FINK:** Thank you. You know, that is a
17 very important question, not only for pediatric age
18 groups, but also for adult age groups who have already
19 been vaccinated.

20 **DR. KURILLA:** Sure.

21 **DR. FINK:** And, so, as we discussed back in

1 October, and at the various VRBPAC meetings for
2 consideration of specific EUA requests, continuing
3 evaluation of vaccine effectiveness in the post-
4 authorization, and even post-licensure period, as new
5 strains and variants emerge (inaudible) will be of
6 utmost importance.

7 And so, if data, at the time of a
8 consideration of a pediatric vaccine licensure or
9 emergency use authorization, suggested that the
10 currently available vaccines, based on that original
11 strain, were no longer effective against the variant
12 currently in circulation, then we would need to take
13 those data into account. And we may decide if there is
14 strong evidence that currently circulating strains are
15 not adequately covered by the vaccine, we may decide
16 that the immunobridging approach, as described in my
17 presentation, would not be sufficient.

18 Based on currently available data, I think we
19 are still seeing very good levels of protection. And
20 so, against the variants that are currently
21 circulating. And so, for that reason we are going with

1 the approach as described in my presentation, and in
2 the briefing document.

3 **DR. KURILLA:** And is that made clear in you
4 guidance to manufacturers that it's not just what their
5 phase three results showed, but rather an ongoing
6 evaluation?

7 **DR. FINK:** I think we've been clear in our
8 discussions with vaccine manufacturers.

9 **DR. KURILLA:** Okay, thank you.

10 **DR. MONTO:** All right, and, just in general, I
11 think that we should try to keep our discussion away
12 from the variant issue because it's a global issue;
13 it's not related only to some of the pediatric
14 questions, which are complex enough. Dr. Cohn?

15 **DR. COHN:** Thanks, Dr. Fink, that was great.
16 One clarifying question before the discussion this
17 afternoon, is FDA focused on those age groups as the
18 only age groups in terms of the breakout, or would FDA
19 consider different breakout, especially between that
20 age two and six where potentially there could be some
21 changes in terms of school-age children versus

1 preschool age children?

2 **DR. FINK:** As I mentioned in my presentation,
3 the specific delineation of age groups that were
4 presented in my briefing documents -- or in our
5 briefing documents, and in the slide, are roughly
6 following the approach to pediatric development and age
7 de-escalation that has been proposed and discussed with
8 individual vaccine manufacturers. If there were
9 scientifically compelling arguments to consider
10 subgroups within those age groups, or to consider
11 different age cutoffs, we would consider those
12 arguments.

13 What I presented really reflects a breakdown
14 in terms of the timing upon which we expect data to
15 become available for various age groups.

16 **DR. COHN:** Thank you.

17 **DR. MONTO:** Thank you. Dr. Nelson.

18 **DR. NELSON:** Good morning. Thank you, Dr.
19 Fink that was an outstanding presentation. Very well
20 thought out and a thoughtful approach to the
21 immunobridging approach, which clearly clinical

1 efficacy endpoints exclusively are likely infeasible at
2 this point. So it did set the stage for our discussion
3 this afternoon.

4 I'll avoid the variant question, although I do
5 share some of the same concerns that Dr. Kurilla had,
6 as we move forward with respect to efficacy. But since
7 this meeting is focused on safety, I wondered if you'd
8 clarify for me a couple of things. One was on Slide 7
9 you talked about features of scientifically rigorous
10 pediatric immunobridging trials. And you talked about
11 the comparator group, and that the data needed to be --
12 or the demographics of the groups, so the active group
13 and the younger age group being study, needed to be
14 similar to the comparator group, presumably the older
15 age group, older adolescents, and young adults.

16 But you made specific mention to similar
17 demographic variables, which I would assume include
18 ethnicity and other things. So in recognition that
19 those adolescent and young adult trials did not
20 sufficiently enroll in some cases specific ethnic
21 groups, how do you reconcile the approach, or how data

1 will be presented for analysis in immunobridging
2 settings, as question number one?

3 The second one is -- oh, well, let's start
4 there.

5 **DR. FINK:** Okay. Well, we expect and
6 encourage (inaudible) vaccine manufacturers to do
7 whatever they can to ensure adequate representation of
8 racial and ethnic minorities in their clinical trials.
9 We understand that sometimes clinical trials do fall
10 short of the goals. And, in this case, those
11 shortcomings are reflected in the labeling of the
12 vaccine, and factsheets in the case of emergency use
13 authorization and in the package inserts in the case of
14 licensed vaccines.

15 **DR. NELSON:** That's fair and very helpful.
16 And, the second one was a little bit unrelated, but it
17 talks about the EUA standpoint. And when we're talking
18 about small signals, particularly in this population
19 relatively smaller trials than the 40,000 plus that we
20 saw with the adult trial leading to the initial EUA
21 authorization. My question is, will small signals

1 generate a pause for a vaccine specifically, or will
2 they extend across all relevant vaccine?

3 And I know that may be hard to predict without
4 understanding the exact signal or scenario, but I
5 wondered if you'd give us what the approach might be as
6 we go through our risk/benefit discussion this
7 afternoon. Thank you.

8 **DR. FINK:** So that is a hypothetical question,
9 you're right; it's very difficult to answer in the
10 abstract. If we were to encounter a signal in the
11 post-authorization, or post-license -- well, if we were
12 to encounter a signal in the post-authorization use of
13 a vaccine -- let's keep it to that for now -- that, we
14 felt, warranted a pause. We would consider very
15 carefully whether that signal applied only to a
16 specific vaccine, or to a subclass of COVID-19
17 vaccines, or to COVID-19 vaccines in general. And we
18 would have to follow the available data to make that
19 determination.

20 **DR. NELSON:** Thank you.

21 **DR. MONTO:** Thank you, one final question from

1 Dr. Kim. Dr. Kim, please.

2 **DR. KIM:** That was great, Dr. Fink. I have a
3 question regarding immunobridging. In your discussion
4 you mentioned that basically the reference group will
5 be the 18 to 25 year olds for the younger age
6 adolescents and children to be studied. Given -- don't
7 we have data on 12 to 17 year olds at this point in
8 time so that we can narrow the age range of the
9 comparison group (inaudible) basically one group
10 (inaudible) immunobridging to 12 to 17 year olds
11 compared to children that are being considered -- those
12 that are younger than 12 year olds? So immunobridging
13 would utilize the data from 18 -- not from 18 to 25
14 year olds, but 12 to 17 year olds. Is it possible?

15 **DR. FINK:** So thank you for that question.
16 That is a question we have considered and discussed.
17 And, there are benefits and risks to that kind of an
18 approach. Though, in terms of potential benefits where
19 you described is that the adolescent age group would be
20 closer in age and presumably closer in terms of the
21 mechanisms of vaccine elicited immunity and immune

1 response to the younger pediatric age groups. And so,
2 potentially would be a comparison -- a reference group
3 that is less prone to bias than using a younger adult
4 group.

5 On the other hand, effectiveness of the
6 vaccine in the adolescent group, if inferred from
7 immunobridging to the original adult reference group,
8 would be based on a statistical comparison. And so
9 then, if you were to use the adolescent group as the
10 reference group for a younger pediatric age group that
11 would be a statistical comparison to a statistical
12 comparison. And you therefore introduce the risk of
13 bio-creep where you're working with a non-inferiority
14 margin that allows for a potentially larger and larger
15 difference in immune response to be successful in
16 (inaudible) the statistical hypothesis testing.

17 So, because of this risk, we would consider
18 that situation to lend itself most appropriately to
19 maintaining the younger adult population as the
20 reference group for all pediatric age groups. And, we
21 have used this approach for other FDA licensed vaccine

1 approved for use in pediatric populations.

2 **DR. KIM:** Great, thanks for the explanation.

3

4 **INDUSTRY PERSPECTIVE: CONSIDERATIONS FOR COVID-19**

5 **VACCINE PEDIATRIC TRIALS**

6

7 **DR. MONTO:** Okay, thank you. And thank you,
8 Dr. Fink, once again. Final talk before lunch, an
9 Industry Perspective: Considerations for COVID-19
10 Vaccine Pediatric Trials, from Phyllis Arthur. Ms.
11 Arthur.

12 **MS. ARTHUR:** Thank you so much for inviting us
13 to give a quick presentation of this, the very
14 important topic for industry. My name is Phyllis
15 Arthur. I'm the Vice President for Infectious Diseases
16 and Emerging Science Policy at BIO. BIO is a trade
17 association here in the United States that works with
18 biotech companies working in human health, food and
19 agriculture, and industrial application of
20 biotechnology. Our members, actually as you know,
21 responded across COVID-19 issues, therapeutic and of

1 course vaccine, as well as diagnostic. And we're very
2 interested in this particular topic.

3 Mainly we wanted to support and underscore the
4 rigor of the FDA's approach to this issue of pediatric
5 trials for the COVID-19 vaccine. And at the end of my
6 presentation I'll highlight just a few questions that
7 we have for the agency that we'd like to have addressed
8 for the sponsors as they work closely with the FDA to
9 execute their pediatric trials.

10 So, I think that there's a lot of agreement
11 that there's a need for understanding of how the COVID-
12 19 vaccines will work in pediatric populations. And
13 the sponsors support the approach and the recognition
14 of the way the FDA is approaching this particular
15 issue.

16 Children, as we've heard from the
17 presentations today, generally have had less burden of
18 disease from COVID-19 infection than adults throughout
19 this pandemic. But, there have been some very
20 important data showing that children are still impacted
21 both with hospitalization and severe disease.

1 On June 4th, the CDC presented at their
2 (inaudible) team meeting some updated data on COVID-19
3 disease in adolescents. And there were over 200
4 (inaudible) adolescent hospitalizations that required
5 intensive care, and five percent of those actually
6 required invasive mechanical ventilation.
7 Additionally, this data showed that the rate of
8 adolescent hospitalization have been rising over the
9 last two months of the pandemic, going from .6 per
10 hundred thousand in March, to 1.6 per hundred thousand
11 in April.

12 Accumulatively, COVID-19 associated
13 hospitalization rates, from October of 2020 to April of
14 this year, were 2.4 to three times higher than we seen
15 in a normal influenza season with (inaudible) proceeded
16 hospitalization rates. And so I think it's important
17 for us to think about both the impact on the
18 adolescents and children themselves, as well as of
19 course the important issue that was discussed earlier
20 about the impact of adolescence in the overall response
21 to the pandemic.

1 Obviously we've heard as well today about this
2 new syndrome that's been associated with COVID-19
3 infections, the MIS-C. And we think that that's an
4 important severe impact that it can have on the heart,
5 lung, kidney, brain, skin, eyes, and gastrointestinal
6 (inaudible) organs. How do we take into account in
7 terms of how children and adolescents are impacted by
8 COVID-19 infection?

9 As we discussed earlier, vaccination is
10 increasing among adults and young adults. And that's
11 very important to reaching overall protection and
12 reduction, or limit and ending of the pandemic.

13 Strategies focused on immunization of these
14 particular populations are certainly important, but you
15 want to make sure that we don't just focus on young
16 adults and older adults if we're going to actually end
17 the pandemic and achieve herd immunity. Children will
18 be a key part of that exercise.

19 For pediatric vaccine clinical trials,
20 sponsors have had decades of experience in working with
21 the FDA on how to approach these trials. And I think

1 Dr. Fink covered many of the examples that we were
2 thinking about as well, particularly how efficacy of
3 HPV vaccines was the immunobridge into efficacy and
4 safety for younger populations, as a good example.

5 We'd also hold up the example of influenza,
6 where it's a good comparator to what we may see with
7 coronavirus as we move from pandemic period to endemic
8 period, where there's a need to understand year-on-year
9 epidemiology and then the (inaudible) and how we may
10 have to look at multi-year studies as a way to really
11 capture overall efficacy in younger population. So, we
12 think there are several different ways to look at
13 trials moving forward, and how to get to younger age
14 groups and look at efficacy over the long term.

15 Sponsors are obviously very pleased with the
16 various options and approaches that really maintain the
17 high standard of how we do research in the COVID -- in
18 pediatric populations. And (inaudible) support the
19 various approaches laid out by Dr. Fink, including
20 randomized controlled trials that are the gold standard
21 for clinical trials, age de-escalation, immunobridging,

1 and of course dose-ranging. And then, of course,
2 rigorous safety monitoring both during the trial period
3 and in the post-trial period, and as well as continuing
4 in the post-marketing period.

5 So we had a few questions that we wanted to
6 share with the FDA and the panel for consideration.
7 Can the agency comment on the regulatory pathway for
8 authorization of lower pediatric doses compared to the
9 doses that are authorized currently in adults? Would
10 immunobridging support use of lower doses in
11 pediatrics?

12 What are the FDA's plans for vaccine
13 effectiveness studies in the pediatric population?
14 What are the expectations for sponsors with regard to
15 vaccine effectiveness studies moving forward? And how
16 will FDA and sponsors collaborate on vaccine
17 effectiveness studies?

18 I'll add an additional question here even
19 though it brings up a topic we just were discussing,
20 which is how is the FDA viewing or approaching
21 pediatric study requirements when it comes to variants.

1 So I know we just discussed we weren't going to talk
2 about variants, but it's one of the questions we have
3 as well as industry. Would FDA be in favor of
4 immunobridging (inaudible) in infants, or would
5 separate studies of pediatric populations for variants
6 of concern, be required.

7 How should sponsors approach co-administration
8 studies -- this has been discussed today as well -- and
9 concomitant use of these vaccines as we move into the
10 more complicated schedule of pediatric immunization?

11 How will FDA use data from pediatric
12 population from the safety monitoring systems that are
13 currently used for COVID-19, for example, V-Safe?

14 How does the FDA intend to collaborate with
15 other regulators outside of the U.S. to ensure global
16 alignment on the approach to vaccine pediatric
17 programs?

18 And how will the FDA's approach evolve as
19 COVID-19 moves from the pandemic phase right now to an
20 endemic phase where the vaccine may be given more
21 routinely in some approach?

1 So these are our questions, and we're very
2 pleased to have the opportunity to speak to the
3 committee today and participate in these important
4 discussions. Thank you, very much.

5 **DR. MONTO:** And thank you so much. You've
6 asked a whole lot of very important questions, which
7 really are directed both to FDA and to our group. We
8 have a few minutes, any of the voting members got
9 comments -- or Dr. Gruber, would you help us out?

10 **DR. GRUBER:** Yes, thank you very much,
11 Phyllis. You make a couple of important questions and
12 I think that some of them we will be certainly
13 addressing when we talk with the particular vaccine
14 manufacturers in our discussions and collaborations on
15 pediatric trials and pediatric development of COVID
16 vaccines. I don't think that we should really engage
17 in these types of discussions today, and really focus
18 on the discussion points and questions that the FDA has
19 formulated.

20 One quick response in terms of global
21 alignment with other regulators, we of course have

1 frequent collaborations and exchange with our
2 regulatory counter-parts to make sure that the
3 approaches that they're using regarding development of
4 COVID vaccine in the pediatric populations, how we're
5 looking at variants of concerns, that we really try to
6 align our approach there.

7 Again, thank you, this is really food for
8 thought and I trust that your questions are going to be
9 discussed and answered in the different (inaudible)
10 available to us. Thank you.

11 **DR. MONTO:** And thank you, Dr. Gruber, for
12 getting us off the hook in terms of answering questions
13 that we're not in the position to answer. So now we
14 have come to almost noon. I see no hands raised from
15 the committee, so I think we're going to take a half
16 hour break for lunch and reconvene for the open public
17 hearing at 12:30 eastern. 12:30 eastern for the open
18 public hearing.

19

20

[BREAK FOR LUNCH]

1

OPEN PUBLIC HEARING

2

3 **MR. MIKE KAWCYNYSKI:** All right. Welcome back
4 and, Dr. Monto, take it away.

5 **DR. ARNOLD MONTO:** Well, welcome back for the
6 open public hearing. I'd like to welcome you all.
7 Please note -- so welcome to the open public hearing.
8 Please note that both the Food and Drug Administration
9 and the public believe in a transparent process for
10 information gathering and decision making. To ensure
11 such transparency, the open public hearing session of
12 the Advisory Committee meeting, FDA believes that it is
13 important to understand the context of an individual's
14 presentation. For this reason, FDA encourages you, the
15 open public hearing speaker, at the beginning of your
16 written or oral statement to advise the Committee of
17 any financial relationship that you may have with the
18 product -- the sponsor, its produce, and, if known, its
19 direct competitors.

20 For example, this financial information may
21 include the sponsor's payment of expenses in connection

1 with your participation in this meeting. Likewise, FDA
2 encourages you at the beginning of your statement to
3 advise the Committee if you do not have any such
4 financial relationships. If you choose not to address
5 this issue of financial relationships at the beginning
6 of your statement, it will not preclude you from
7 speaking. So over to you, Prabha.

8 **DR. PRABHA ATREYA:** Good afternoon, everyone.
9 Thank you. Welcome to the open public hearing. We
10 have a few speakers who pre-registered, and each have
11 five minutes to speak. We will start with Dr. Sydney
12 Wolfe. Dr. Wolfe, can you start?

13 **DR. SYDNEY WOLFE:** Sydney Wolfe, Public
14 Citizen's Health Research Group. I have no conflict of
15 interest. Last week in the morbidity/mortality weekly
16 reports of the CDC, the following statement was issued
17 relevant to the 12 to 17 year olds that the current
18 issue of EUAs has to do with. "Recent increases in
19 COVID-19 associated hospitalization rates and the
20 potential for severe disease requiring intensive care
21 unit admission, invasive mechanical ventilation among

1 adolescents indicated an urgent need for vaccination in
2 combination with correct and consistent mask wearing by
3 persons not yet fully vaccinated.”

4 The data, which includes 14 states, looked at
5 for hospitalizations between January 1st of this year
6 and March 31st included, as I said, 240
7 hospitalizations. Almost a third, 64, required
8 intensive care unit admissions. 10 required mechanical
9 ventilations. Fortunately, none of them died.

10 These are obviously people who were not
11 vaccinated at all in this 12 to 17 year old age group.
12 And the message at the CDC said -- urgent need for
13 vaccination in such people. The next slide comes from
14 little is there in the public eye from Moderna's
15 statement on May 25th. Out of roughly 1,000 placebo
16 recipients in their trial of 12 to 17 year olds, four
17 out of 1,000 got COVID. Whereas, out of 2,000 slightly
18 more confirmed cases in the vaccine group there were
19 none -- so no confirmed cases. And as they say, this
20 is a 100 percent calculated efficacy.

21 We go back to these data just to get on this

1 issue of the need in people 12 to 17 -- obviously,
2 older the same and younger, but those have not been
3 tested yet -- for vaccination. So without vaccination,
4 hospitalizations -- just, again, 14 states -- intensive
5 care unit admissions and so forth. And this segues
6 into one of the briefing document pages, page 12, "Why
7 Use Placebos in Future COVID-19 Randomized Trials?" is
8 the question being asked.

9 "If another COVID-19 vaccine is licensed or
10 authorized for use in the age groups enrolled in the
11 trial recommended by public health authorities and
12 widely available, such that it is unethical to use a
13 placebo control, the licensed or authorized COVID-19
14 vaccine could serve as a control." So this is talking
15 about planning future trials. Obviously, the Moderna
16 and/or Pfizer trials were or could have been organized
17 that way. But as we get into other trials in that age
18 group and younger age groups, I fully agree with this
19 idea.

20 And it certainly brings to mind the issue that
21 I've raised -- and I think others did -- in the first

1 Pfizer meeting, which is what happens in the case of
2 the Pfizer -- the 2,000 people who were in the placebo
3 group? And I had advocated they should be immediately
4 notified and offered a vaccine, and I think that that's
5 been done. I believe it's been done for the Moderna.

6 And I raised the question -- which I hope the
7 answer's yes -- has it been done for the 2,000 children
8 -- the 1,000 children in the Moderna and roughly the
9 same amount in the Pfizer age 12 to 17 who got a
10 placebo? They should get a vaccine. Just as in future
11 trials nobody should be getting a placebo in a trial.

12 The reasons for having these comparative
13 studies, obviously, is an ethical reason. It would be
14 unethical once there's an authorized vaccine for that
15 age group. Parents would be much more willing to
16 enroll their children since they would always get some
17 treatment, not a placebo.

18 And related to that obviously, clinical trials
19 for subsequent vaccines for that age group would
20 therefore have less difficulty with enrollment, with
21 one already authorized vaccine around for whichever age

1 group. The next one is below 12. It would be
2 difficult to enroll people if you are telling them you
3 have a 50 percent or a 30 percent chance of getting a
4 placebo.

5 And finally, this has to do with Question 3
6 that you're being asked to address today. "Please
7 discuss studies following licensure and/or issuance of
8 an EUA to further evaluate safety and effectiveness of
9 COVID-19 vaccines for different pediatric age groups."
10 Since FDA has not yet authorized publicly -- at least,
11 we don't know it's been done, and it's supposed to
12 happen in the next few days -- the Moderna vaccine for
13 12 to 17 year old adolescents, why were these data not
14 provided during this meeting. As you know, there was
15 not a comparable meeting before the Pfizer 12-17 was
16 authorized, and so there wasn't an opportunity to do
17 it. But it should be part of the discussion.

18 And in conclusion, a much more evidence based
19 discussion of Question 3 -- which I just read -- could
20 have thereby occurred. Further evaluation of any
21 vaccine for any age groups needs to be predicated on

1 what is already known. Thank you very much.

2 **DR. PRABHA ATREYA:** Thank you, Dr. Wolfe. The
3 next speaker is Dr. Peter Doshi. Let us know if you
4 need us to move the slide, please.

5 **DR. PETER DOSHI:** Hello, I'm Peter Doshi.
6 Thanks for the opportunity to speak. If you could
7 please advance to my title slide showing my financial
8 disclosures. For identification purposes, I'm on the
9 faculty at the University of Maryland and an editor at
10 the *BMJ*. And I have no relevant conflicts of interest.
11 Next slide, please, the slide labeled "Slide A" at the
12 top right.

13 So the question is what is the evidence in
14 children thus far? Let's take Pfizer's trial of 12 to
15 15 year olds, which supported the recent EUA. In this
16 trial, harms outweighed the benefits. The placebo
17 group was better off than the vaccine group. I know
18 that's a blunt way to put it, but the reason is because
19 efficacy benefits were rare. Whereas side effects were
20 common.

21 I'll explain that. In terms of the benefits,

1 the reported 100 percent efficacy was based on 16 COVID
2 cases in the placebo group versus none in the fully
3 vaccinated group, but there were around 1,000 placebo
4 recipients. So just 2 percent got COVID. Put another
5 way, 2 percent of the fully vaccinated avoided COVID,
6 whereas 98 percent of the vaccinated wouldn't have
7 gotten COVID anyway.

8 But on the other side of the ledger, side
9 effects were common. It's on my slide. Three in four
10 kids had fatigue and headaches. Around half had chills
11 and muscle pain. Around one in four to five had fever
12 and joint pain. The list goes on.

13 In sum, all fully vaccinated 12 to 15 year
14 olds avoided symptomatic COVID, but most wouldn't have
15 gotten COVID even without the vaccine. So the benefit
16 is small, but it came at the price of very common side
17 effects that were mild to moderate in severity and
18 lasted a few days. And then, there are the long term
19 effects about which we still know nothing. I'll come
20 back to this point. Next slide, "Slide B," please.

21 Why do so few vaccinated children enjoy any

1 efficacy benefit? As I said, one reason is that few
2 kids got COVID, at least during Pfizer's trial. Also,
3 many infections are asymptomatic. But another reason
4 is that many children are post-COVID at this point.

5 The CDC estimate from 25 million children were
6 infected by March. That translates into 23 percent of
7 kids zero to four years old and 42 percent of children
8 five to 17 years as being post-COVID. And I say post-
9 COVID because the evidence to date suggests that the
10 immune response following natural infection is robust
11 and long lasting. I think this is why so few
12 vaccinated kids reap any benefit. Next slide, "Slide
13 C," please.

14 Now, let's talk about long term harms.
15 There's a view out there that serious side effects
16 always occur within six weeks of dosing. Well, it's
17 just not so simple. The fact is that, historically,
18 side effects were not always discovered so quickly.
19 For pandemics and influenza vaccine, cases of
20 narcolepsy in adolescents were first reported around
21 nine months after vaccines were given. And now, with

1 COVID vaccines, it wasn't until this month, four or
2 five months into the vaccination campaign in Israel,
3 that myocarditis was recognized as a harm in young men.

4 So it's not simply a matter of how long after
5 dosing did these adverse events occur. The crucial
6 question is when are these adverse events noticed,
7 researched, and established as linked to the vaccines.
8 The pharmacovigilance timeline matters.

9 Unless you recognize harms soon after they
10 occur, you can't use that knowledge to prevent harm in
11 the next person about to get the vaccine. And on long
12 term harms, we know nothing. All we can do is
13 theorize, say, by considering the mechanism of action,
14 vaccine biodistribution and other essential studies
15 that we outlined in our June 1st citizen petition.
16 Next slide, "Slide D," as in David, please.

17 Next, I want to address this idea of
18 vaccinating children to protect adults. I encourage
19 the Advisory Committee to read Dr. Lavine et al's
20 editorial to explain why, "Vaccinating children is
21 likely to be of marginal benefit in reducing the risk

1 to others." And even if you think a small benefit is
2 better than nothing, let's not forget that it's an
3 unproven hypothetical benefit. We need confirmatory
4 evidence, not just assumptions.

5 And then there's the ethics and the law. FDA
6 can only indicate a product for use in a given
7 population if benefits outweigh risks in that same
8 population. So if benefits don't outweigh risks in
9 children themselves, it can't be indicated for
10 children, full stop. Whether vaccinating children
11 might help adults is a moot point. Final slide, "Slide
12 E," please.

13 In summary, we must avoid a fiasco. EUA
14 criteria are not met because there is no emergency for
15 children. Thus far, risks outweigh benefits, and we
16 know nothing about long term safety other than
17 history's lessons to be very cautious. Does this mean
18 we should prevent parents desiring to vaccinate their
19 children? No.

20 Access does not require an EUA or BLA.
21 Rather, an expanded access program can thread the

1 needle, providing access to vaccines while being honest
2 about the evidence that it has not been demonstrated
3 that benefits outweigh risks. FDA approval must
4 represent a high bar of robust evidence. Otherwise,
5 the whole point of regulation is lost. Thank you for
6 listening.

7 **DR. PRABHA ATREYA:** Thank you, Dr. Doshi. The
8 next few speakers do not have any PowerPoint
9 presentations. The next one is Dr. Jacqueline Miller.

10 **DR. JACQUELINE MILLER:** Thank you and good
11 afternoon. My name is Jacqueline Miller, and I'm the
12 head of development for infectious diseases at Moderna.
13 As a pediatrician and mother, I am very encouraged that
14 the VRBPAC has convened to discuss authorization and
15 licensure criteria for COVID-19 vaccines in the
16 pediatric population.

17 This pandemic has dramatically altered life
18 for all Americans over the past year, including our
19 children. Because of concerns of COVID-19 disease and
20 transmission, children have had to adapt to distance
21 learning, reduced group activities, and the restricted

1 ability to interact with other children and their
2 teachers. School closures have significantly impacted
3 the lives of students. Education is one of the
4 strongest predictors of an individual's future success,
5 and the impact of longer term school closures on the
6 future health and achievement of children have not yet
7 been quantified.

8 According to the CDC, 18 percent of COVID-19
9 cases reported during the month of April occurred in
10 children and adolescents. To date, more than 3 million
11 cases of COVID-19 have occurred in children. And while
12 children are less frequently impacted by the severe
13 complications of COVID-19, we have observed unusual and
14 severe disease in children, including MIS-C which is
15 characterized by high fever, severe systemic
16 inflammation, and hospitalization. As with adults,
17 children of color have been disproportionately impacted
18 by this complication with 64 percent of cases occurring
19 in Black or Hispanic children.

20 Moderna strongly supports the vaccination of
21 children and is actively generating clinical data. We

1 recently communicated the topline results of our Teen
2 COVE study, which enrolled more than 3,700 children 12
3 to 17 years of age, 26 percent of whom were from
4 communities of color. The vaccine efficacy in the
5 nearly 2,500 adolescents who received Moderna COVID-19
6 vaccine was observed to be 100 percent when using the
7 same case definition as in the pivotal trial for
8 adults. When using a less restricted case definition,
9 the vaccine efficacy was 93 percent, and asymptomatic
10 infection occurring 14 days after the first dose was
11 reduced by 60 percent.

12 The primary immunogenicity endpoint of the
13 study was met, demonstrating that the antibody
14 responses induced by the vaccine in 12 to 17 year old
15 adolescents are similar to those in adults 18 to 25
16 years of age. The safety profile of the vaccine was
17 generally similar between adolescents and young adults.
18 We will continue to monitor these study participants
19 for efficacy, immunogenicity, and safety endpoints for
20 12 months after vaccination. And we submitted our
21 application for the authorization of emergency use to

1 the U.S. FDA yesterday.

2 We're also conducting Kid COVE, a clinical
3 trial in pediatric subjects in over 6,700 children who
4 are six months to 11 years of age. We have focused on
5 ensuring the safety of children and, therefore, are
6 conducting a dose ranging study to see if a lower dose
7 might be effective in younger children. We look
8 forward to providing additional update to this study as
9 information becomes available.

10 The available data in children complements the
11 data we are continuing to accrue in the pivotal Phase 3
12 study and through rigorous safety monitoring through
13 the emergency use authorization program in
14 collaboration with the FDA and CDC. Over 100 million
15 Americans have received at least one dose of COVID-19
16 vaccine, and the benefit-risk profile remains strongly
17 favorable.

18 We remain committed to comprehensive, ongoing
19 safety monitoring, signal detection, and proactive and
20 transparent risk communication in collaboration with
21 the FDA, CDC, and other regulatory agencies.

1 Vaccination against COVID-19 will not only directly
2 benefit children's health but also enable them to
3 safely return to school and other activities. We are
4 extremely grateful to the VRBPAC and the FDA for
5 meeting today to provide guidance about the data
6 necessary to support emergency use authorization and
7 licensure of COVID-19 vaccines in children. Thank you.

8 **DR. PRABHA ATREYA:** Thank you, Dr. Miller.
9 The next registered speaker is Ms. Kim Witczak.

10 **MS. KIM WITCZAK:** Great. Good afternoon. My
11 name is Kim Witczak, and I'm speaking on behalf of
12 Woody Matters, a drug safety organization started after
13 the death of my husband due to an undisclosed side
14 effect of antidepressants. We represent the voice of
15 families who live every day with the consequences of
16 the current drug safety system. I'm also on the board
17 for USA Patient Network, an independent patient voice
18 advocating for safe and effective successful medical
19 treatments.

20 There are over 74 million children between
21 zero and 17 in the United States and close to 2 billion

1 globally. While I don't have kids personally, I care
2 deeply about them. They are our future, and they will
3 be here after you and I leave this world. And that's
4 why I'm here today.

5 I have great concerns over the authorization
6 or, worse yet, fear a premature full approval of COVID
7 vaccines for children. For starters, is there really
8 an emergency with children and COVID? The data shows
9 kids are neither in danger nor dangerous. They are a
10 small percent of the total cases with even a smaller
11 number who experience serious illness or die. I
12 question the timing of last Friday's CDC announcement
13 of the rise in children being hospitalized with COVID.
14 The media ran with it, and more fear was stirred,
15 perfectly timed in advance of this meeting.

16 Does the public truly understand how pediatric
17 trials work, like, how few children are actually in
18 them, how efficacy protection is often determined by
19 immuno-bridging based on an assumption using adults'
20 experience, or safety is considered adequately
21 characterized using only several hundred trial

1 participants? Assumption on top of assumption. This
2 hardly makes me feel confident in the one size fits all
3 shots -- on how they're being evaluated, especially
4 when there's a potential to be used on millions of
5 children. Trust me, the average person doesn't
6 understand this. All they are being told is it's safe
7 and effective.

8 The truth is we don't really know that much
9 about these vaccines. The safe and effective messaging
10 is being thrown around from everyone from government
11 officials, the media community, religious leaders, to
12 Hollywood celebrities. Then, you add in all the
13 promotions, like multimillion dollar lotteries, free
14 donuts, free shots at the local bar, and so on. This
15 subconsciously creates the allusion that there are no
16 downsides whatsoever, nothing to weigh or consider.

17 Right now, the discussions around vaccines
18 seems to be less and less about the science and
19 becoming more and more driven by political agendas and
20 motivations. With all the talks of mandates and having
21 kids vaccinated by fall, there is certainly political

1 pressure to approve and license these vaccines.

2 However, this is completely outside the FDA's purview
3 and opens a Pandora's box for compulsion.

4 Like mandates, approving vaccines to bolster
5 public confidence and convert the vaccine-hesitant is
6 backwards and, again, is outside of the FDA's legal
7 purview. Last week, I, along with a group of 26
8 researchers and clinicians from around the world, filed
9 a citizen petition. I believe you should have a copy
10 in your documents today. We outline several efficacy
11 and safety measures that must be met before you
12 consider granting full approval, and that includes:
13 completing at least two year follow up in participants
14 in pivotal clinical trials, even if they were unblinded
15 and we lost the placebo control group; ensuring the
16 evidence of effectiveness outweighs the harm in special
17 populations, including babies, children, and
18 adolescents; and a thorough investigation of all
19 adverse reactions, including deaths. We simply cannot
20 ignore the growing evidence of harm and just accept the
21 narrative "It's a good thing. That means the shot is

1 working.”

2 This reminds me of the same attitude the
3 medical establishment had when we were trying to get
4 black box suicide warnings added to anti-depressants.
5 And suicide was dismissed as inherent in the disease of
6 depression. We need to dig deeper and find out if
7 there’s causal link, like Norway’s government did with
8 the 100 nursing home deaths. And they found that 10
9 were likely and possibly 26 were causal. What has the
10 U.S. done?

11 As you are debating the merits, please look
12 inward and ask yourself if this is truly the right
13 thing for humanity. What if years down the road you
14 found out the decision you made today negatively
15 impacted your children and grandchildren’s health? Do
16 you want this on your watch? I often think back to the
17 1991 FDA Advisory Committee meeting debating the link
18 between Prozac and suicide and violence. At the time,
19 every one of the Advisory members with financial ties
20 to industry voted no. It wasn’t until 2004, 13 years
21 later with more antidepressants on the market and now

1 approved for kids, that black box warnings were
2 eventually added. How many lives were destroyed,
3 including my husband's, because of that decision made
4 in 1991?

5 My closing message to you is this: go slow.
6 There's no rush. The future generations are depending
7 on you. Thank you.

8 **DR. PRABHA ATREYA:** Thank you, Ms. Witczak.
9 The next registered speaker is Ms. Terri Diaz.

10 **MS. TERRI DIAZ:** Hi. My name is Terri Diaz,
11 and I am co-founder of GPAC, Global Patient Advocacy
12 Coalition. I have no financial interests. I'm a
13 patient who was harmed by an FDA approved medical
14 device, and I am a passionate advocate for all patients
15 to have proper informed consent. Thank you for having
16 me speak today to speak about the use of COVID vaccines
17 in children.

18 According to the CDC website, although
19 children can be infected with COVID-19, can get sick,
20 and can spread the virus to others, less than 10
21 percent of COVID-19 cases in the United States have

1 been among children and adolescents aged five to 17
2 years. Compared with adults, children and adolescents
3 who have COVID-19 are more commonly asymptomatic or
4 have mild, nonspecific symptoms. Children and
5 adolescents are less susceptible to infections and have
6 milder cases.

7 For a population that has the absolute lowest
8 risk, I feel that it is imperative to look at the
9 current facts and emerging data for this disease and
10 the mRNA vaccines. There are many unknowns that the
11 scientific and medical communities are still working on
12 to understand. Our children are a vulnerable age
13 group, with many years of growth ahead of them. And I
14 urge you to use extreme caution when making decisions
15 about the youth of this experimental mRNA vaccine.

16 Please consider first and foremost the fact
17 that we do not have long term safety data. It is
18 dangerous and reckless to expose children to an
19 unnecessary procedure where we do not know the long
20 term outcome. There are many risks and complications
21 that are emerging as more people have become

1 vaccinated.

2 Last month, a CDC advisory group recommended
3 an investigation into further study of the possibility
4 of a link between myocarditis and the mRNA vaccine,
5 which includes those from Pfizer and Moderna. In a May
6 24th meeting, the CDC advisory group said the data from
7 the VAERS reporting system showed a higher than
8 expected number of observed myocarditis or pericarditis
9 in ages 16 to 24 years old. In addition, a specially
10 appointed epidemiological team in Israel has found a
11 likelihood of a link between receiving the second dose
12 of Pfizer's COVID-19 vaccine and the onset of
13 myocarditis in young men.

14 As we know, Israel has been one of the first
15 countries in the world to vaccinate the majority of its
16 population. The resulting information that comes out
17 may be beneficial in understanding how the vaccine
18 affects the pediatric population. One June 1st, 2021,
19 Israel's health ministry stated that it found the heart
20 inflammation cases were likely linked to the
21 vaccination. The study stated that there is a probable

1 link between receiving the second dose of the Pfizer
2 vaccine and the appearance of myocarditis among men
3 aged 16 to 30.

4 According to the findings, such a link was
5 observed more among men aged 16 to 19 than any other
6 age group. There is a possibility that our pediatric
7 population could potentially have long term heart
8 issues as a result of receiving the COVID vaccines.
9 This could result in a lifetime of medical costs and a
10 debilitating health complication. It would be most
11 beneficial and in the best interest of our sons and
12 daughters to wait until more scientific data is
13 available before making any decision about
14 administering the COVID vaccine to children and teens.

15 The lack of manufacturer accountability is
16 something that should be highly considered. Currently,
17 the FDA and the CDC reporting system is challenging at
18 best, whereas most patients and even the medical
19 community does not know how to report to VAERS, which
20 means the number of adverse reaction reports are only a
21 fraction of the actual reports. As of May 28th, there

1 were 294,801 of adverse event reports, and the
2 manufacturer should be responsible for compensating
3 patients who are harmed, disabled or who have died.

4 In the FDA briefing materials, it clearly
5 states that the EUA can only be issued after certain
6 requirements are met. One of those requirements is
7 that there is no adequate approved and available
8 alternative to the product for diagnosing, preventing,
9 or treating the disease or condition. We have seen
10 multiple studies come forward that have shown
11 hydroxychloroquine and ivermectin as a successful
12 treatment in fighting COVID-19.

13 This blatant and obvious fact complete
14 discredits the need for an EUA. It is my
15 recommendation at this time for the FDA to not approve
16 or license any COVID vaccines until clinical trials
17 have been completed and long term safety data is
18 available. Long term safety data will give patients an
19 opportunity to make informed decisions about getting a
20 COVID vaccine. My mom, who was in a vulnerable
21 population, received her full Pfizer vaccines in the

1 month of March, contracted COVID the end of April, and
2 just passed away on May 14th, which makes me question
3 the effectiveness of this vaccine.

4 In summary, as we do not have a full grasp on
5 how the COVID vaccines are affecting people long term,
6 I implore you to protect American children and refrain
7 from making a decision until we have more scientific
8 data. It is reckless and irresponsible for the FDA to
9 approve these vaccines in children when we do not fully
10 comprehend the long term affect. Thank you for your
11 time today.

12 **DR. PRABHA ATREYA:** Thank you, Ms. Diaz. The
13 next speaker is Dr. Ros Jones.

14 **DR. ROS JONES:** Hello, I'm a pediatrician from
15 Britain from the Health Advocacy and Recovery Team,
16 representing a group of British doctors and academics,
17 and we have no conflict of interest. We're very
18 concerned at the speed of rolling out COVID-19 vaccines
19 to children while the safety data in young adults is
20 still building. We all know that the risk of harm from
21 COVID-19 infection reduces the younger the age group

1 under consideration, but it appears that for the side
2 effects the opposite is true, with both
3 thrombocytopenic complications and myocarditis both
4 having higher prevalence in younger age groups.

5 And there clearly would have to be a tipping
6 point where risk of harms exceeds potential risk of
7 benefits. I would suggest that probably applies to
8 young adults as well, but my concern here is as a
9 pediatrician for children. We have no evidence that
10 children need this, and we have plenty of evidence
11 accruing that the risks of harm will outweigh any
12 potential benefits.

13 Your VAER system is rather like our yellow
14 cards, tends to have considerable under reporting and
15 also problems with ascribing causation. But you have
16 your near-live surveillance for health insurance, which
17 seems especially useful. We've discussed that standard
18 trials don't have sufficient statistical power to
19 elicit rare and severe side effects. But there seems
20 to be only one other alternative ever discussed, and
21 that is simply, oh, just watching to post-marketing

1 surveillance.

2 And as everybody's said, that's under
3 reported. It's delayed in coming through, and by the
4 time you get this information, millions more children
5 will have been vaccinated and potentially harmed. And
6 one of the previous speakers was even questioning the
7 ethics of using a placebo. And yet to my eyes, the
8 question is about the ethics of vaccinating children
9 that we don't know -- when we don't know this is safe.

10 So I just wonder if in the States -- we're
11 watching this closely because in the UK it's just been
12 authorized on a temporary basis, just as you have. But
13 we haven't started using it, and we're desperately
14 trying to prevent that happening. Would you have even
15 considered at this time during the summer months when
16 the risk of COVID is so low that you could randomize
17 between states so you had some children who were going
18 to get the vaccine now and others who would get it in a
19 few months' time? You could have 100,000 or a million
20 children in both arms of your study very quickly and
21 really answer the safety data.

1 But at the moment, we're just rushing headlong
2 into vaccinating children without adequate safety data,
3 neither short term nor long time. And the ethics of
4 that is quite, I think, horrific. And particularly as
5 Peter Doshi said earlier on, if we start talking about
6 herd immunity, the ethics of expecting children to take
7 a risk of harm for the sake of older adults is totally
8 unacceptable and inappropriate.

9 So like the last two speakers, I would plead
10 with the FDA not to be rushing ahead with any further
11 approval. But if you are doing so, then for goodness'
12 sake at least consider delaying some of those so you
13 get some decent data to help those of us in the rest of
14 the world who are waiting with bated breath to see how
15 this unfolds. Thank you.

16 **DR. PRABHA ATREYA:** Thank you, Dr. Jones. The
17 next speaker is Dr. Meg Seymour.

18 **DR. MEG SEYMOUR:** Thank you for the
19 opportunity to speak today on behalf of the National
20 Center for Health Research. I am Dr. Meg Seymour, a
21 senior fellow at the center. We analyze scientific

1 data to provide objective health information to
2 patients, health professionals, and policy makers. We
3 do not accept funding from drug or medical device
4 companies, so I have no conflicts of interest.

5 We can all agree that it is of utmost
6 (Inaudible) safety and effectiveness of vaccines for
7 children across age groups. There must be an
8 appropriate and favorable balance of the benefits and
9 risks in order to support both an EUA and licensure.
10 We agree with the FDA's assessment that the lower
11 burden of disease in pediatric populations warrants
12 more stringent criteria for safety and effectiveness
13 than for adults.

14 In terms of the vaccine safety, we agree with
15 the FDA in order to adequately assess risks in pre-
16 licensure clinical trials, the safety database for each
17 age group should be at least 1,000 vaccine recipients,
18 plus control recipients. Given the millions of
19 children who might be vaccinated using a licensed
20 vaccine, we think it should be studied on a sample of
21 at least 3,000 children. In addition, the FDA's

1 recommended follow up time of a median of at least six
2 months at the completion of the vaccination regimen is
3 not long enough. For an adequate assessment, FDA
4 should require that children should be followed for a
5 minimum of six to nine months, not a median that
6 includes follow up of less than six to nine months.

7 Finally, we want to stress the importance of
8 enrolling children from all racial and ethnic groups,
9 including minorities who are most affected by COVID-19
10 in clinical trials of the vaccines. While we are happy
11 to see that FDA encourages diversity in clinical
12 trials, mere encouragement is not enough. Vaccines
13 should not be granted EUA or licensure for use in
14 populations for which they have not been tested and
15 shown to be both safe and effective.

16 Please consider these points during your
17 discussion today in order to ensure a favorable balance
18 of benefits and risks for vaccines among the pediatric
19 population. Thank you.

20 **DR. PRABHA ATREYA:** Thank you, Dr. Seymour.

21 The next and final speaker is Ms. Nissa Shaffi.

1 **MS. NISSA SHAFFI:** Good afternoon. My name is
2 Nissa Shaffi, and I'm representing the National
3 Consumers league. I have no conflicts of interest.
4 The National Consumers League was founded in 1899 by
5 the renowned social reformer, Florence Kelley. General
6 Secretary Kelley's support of vaccinations played a key
7 part in mitigating a critical smallpox outbreak towards
8 the end of the 19th Century. And her stalwart advocacy
9 for immunizations has informed NCL's bedrock principles
10 for vaccine education, confidence, and safety.

11 122 years later we are honored to persist in
12 our pursuit to advance vaccines as vital public health
13 interventions, and we extend our gratitude to the
14 Vaccines and Related Biological Products Advisory
15 Committee for the opportunity to present comment during
16 this public hearing session. NCL appreciates that the
17 FDA recognizing that emergency use authorization is not
18 intended to replace the rigor of full approval and that
19 randomized clinical trials are critically important for
20 the definitive demonstration of safety and efficacy of
21 a treatment. The diligent review and public engagement

1 that went into the EUA process for the COVID-19
2 vaccines currently available have helped our nation
3 reach key milestones in immunization.

4 As our adult populations have benefited from
5 these critical public health efforts, we are energized
6 to extend that momentum towards our youngest citizens.
7 Through our education and outreach of consumers, we
8 support the FDA in its efforts to develop a safe and
9 effective and expedited pathway towards a COVID-19
10 vaccine via EUA to help prevent the spread of the virus
11 in pediatric populations. We are encouraged to learn
12 of the Committee's approach towards evaluating the
13 safety and efficacy of the COVID-19 vaccines, and we
14 have great trust in the FDA's safety monitoring systems
15 and call on the Agency to perform ongoing post-market
16 surveillance to ensure the vaccines' continued safety
17 and efficacy.

18 As we've observed with recent vaccine safety
19 concerns, consumers rely on public health agencies to
20 communicate and respond to any potential adverse events
21 regarding the COVID-19 vaccine. We call on the FDA to

1 continue to sustain its robust interagency
2 collaboration as we endeavor to vaccinate the nation.
3 Although children are at lower risk of COVID-19
4 compared to adults and tend to experience milder
5 symptoms, pediatric populations now account for 22
6 percent of new COVID-19 cases, compared to 3 percent
7 last year.

8 As with adults, children and adolescents with
9 underlying chronic health conditions are at higher risk
10 for COVID-19 related hospitalization and death. The
11 absence of a vaccine for pediatric populations will led
12 to continuing transmission that will consistently put
13 children at risk for infection. Furthermore, vaccine
14 uptake for routine pediatric immunizations have
15 declined dramatically during the pandemic.

16 It is essentially for public health officials,
17 advocates, and parents to ensure that children are up
18 to date with their vaccines and that children eligible
19 for the COVID-19 vaccine receive their shot. Data
20 shows that the COVID-19 vaccine currently available for
21 children ages 12 to 15 is safe and effective and has

1 been recommended to be co-administered along with
2 routine pediatric vaccinations. While COVID-19 has
3 impacted the entire country, it has largely devastated
4 communities of color.

5 Children of color, specifically Black and
6 Hispanic youth, have been especially vulnerable. This
7 has been even more apparent with the prevalence of
8 multisystem inflammatory syndrome in children, a rare
9 but serious COVID-19 associated condition that has been
10 observed in children one to 14 years of age, 64 percent
11 of which were reported to be Black or Hispanic.

12 To achieve meaningful herd immunity, we will
13 need to ensure that children have access to a safe and
14 effective COVID-19 vaccine and also consider the unique
15 disparities that children of color experience in the
16 face of the pandemic. Thank you to the Committee for
17 your consideration of our views on this important
18 public health issue.

19 **DR. PRABHA ATREYA:** Thank you, Ms. Shaffi.
20 And this concludes the open public hearing for the
21 public record, and so with the permission of the Chair,

1 I would like to announce a 10 minute break, the next
2 item on the agenda. And then after 10 minute break, we
3 will reconvene to start the Committee discussion this
4 afternoon. Thank you.

5

6

[BREAK]

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COMMITTEE DISCUSSION

10

11 **MR. MICHAEL KAWCZYNSKI:** All right. Welcome
12 back to the FDA Center for Biologics Evaluation and
13 Research VRBPAC meeting. We will now enter into the
14 committee discussion. Dr. Monto, take it away.

15 **DR. ARNOLD MONTO:** Welcome back. Glad
16 everybody is here a few minutes early. Our open public
17 hearings were a little shorter than anticipated. So
18 I'm delighted that we could start a few minutes early
19 because we have a lot to discuss. And before we go on
20 to some of the discussion topics, I wanted to make sure
21 that everybody was comfortable with the presentations

1 we've had. I see Dr. Rubin has his hand raised. So
2 I'll call on Dr. Rubin.

3 **DR. ERIC RUBIN:** Thanks, Dr. Monto. I have a
4 question -- and it might be for Dr. Kirking if she's
5 still here -- left over from this morning. It's true,
6 as several people have pointed out, that the rate of
7 COVID-19 is declining, but really that brings it down
8 closer to -- it's still way ahead of many of the other
9 viral diseases that we immunize children for. So I
10 wonder if you can put COVID-19 in the context -- and
11 the risk and benefits (audio skip) for children in the
12 context of the MMR preventable disease, any of the
13 other childhood vaccines that we use on a routine
14 basis, just give an idea of the magnitude?

15 **MR. MICHAEL KAWCZYNSKI:** Dr. Kirking, there
16 you go. Make sure you unmute. Go ahead.

17 **DR. ARNOLD MONTO:** Thank you for being there.
18 Go ahead, please.

19 **DR. HANNAH KIRKING:** Yeah, I'm here. Thank
20 you for the question. So just to clarify, make sure
21 I'm understanding, you want to know how to put the

1 context of COVID-19 declining case rate without
2 vaccination of children or in the context of what we
3 see with measles, mumps, rubella first?

4 **DR. ERIC RUBIN:** Well, no, I guess I'm
5 thinking about -- the question that we're faced with is
6 something of a risk-benefit question. Is there enough
7 disease to warrant the somewhat unknown risks of the
8 vaccines or less known risks than these older vaccines?
9 But we are using the older vaccines in diseases that
10 are very rare. And if you think about the risk of
11 mumps or measles or rubella or any of the other
12 diseases (phonetic) in children where the rates are
13 also very low and yet we continue to immunize, can you
14 just kind of put it in the context of what the benefits
15 would be for vaccination?

16 **DR. HANNAH KIRKING:** Yeah, it's a great
17 question. I guess I would say that it's a good
18 analogy, actually, one that I haven't spent a lot of
19 time thinking about. But it's a little bit to, like,
20 the tolerance of transmission probably and what can
21 happen when transmission begins. And this is where I

1 think the risk-benefit to the individual is one way of
2 looking at it, but the risk-benefit across the
3 population is the other. Similar to, as you kind of
4 allude to, a lot of the benefit of a measles vaccine in
5 a single kid or in a cluster of children is usually to
6 prevent outbreaks as much as it is to benefit them at
7 the individual level. So it is a good analogy to make.

8 I think, again, the unknown, a little bit, is
9 that we have some sense of transmission and what could
10 happen with measles or mumps or rubella -- probably
11 beyond our ability right now to predict what will
12 happen with transmission for COVID. And so the analogy
13 is a good one I would say.

14 Knowing the trajectory of what's going to
15 happen, I think is a little bit more unknown for COVID.
16 Similarly, though, I do think that there is -- based on
17 what we know about children's ability to be infected
18 and their (audio skip) as well as transmission, I do
19 think that there is some risk for transmission in child
20 centric populations where you congregate those who are
21 unvaccinated, which is not totally dissimilar to things

1 we might consider related to measles or some of the
2 other childhood illnesses.

3 So I'm not sure if I'm answering your question
4 fully or not. It's a little hard to make a full direct
5 comparison. But I do think, with the population versus
6 individual considerations, it holds valid.

7 **DR. ERIC RUBIN:** No, thank you very much. I
8 realize that it's an extremely difficult question. I
9 appreciate your taking a shot at it.

10 **DR. HANNAH KIRKING:** No problem.

11 **DR. ARNOLD MONTO:** Dr. Wharton.

12 **DR. MELINDA WHARTON:** Thank you. I think this
13 question is for Dr. Fink. I was glad to see the
14 discussion of dose ranging studies in the FDA briefing
15 document and just wanted to ask a question about that.
16 Is it reasonable to assume that further vaccine
17 development in younger age groups will be preceded by
18 dose ranging studies?

19 **DR. DORAN FINK:** Yes. That's a reasonable
20 assumption. And I believe that ongoing studies have
21 some details published on ClinicalTrials.gov so you can

1 look and see what's being done with regards to dose
2 ranging.

3 **DR. MELINDA WHARTON:** Great. Thank you.

4 **DR. ARNOLD MONTO:** And Doran, as a parallel to
5 that question, how does that fit into the safety
6 database?

7 **DR. DORAN FINK:** So, typically, what we would
8 ask for is an adequately sized safety database of trial
9 participants exposed to the dose and regimen intended
10 for use, whether that's use under Emergency Use
11 Authorization or use post-licensure. That number is
12 clearly a topic for discussion today. If there are
13 data available for higher doses -- although we would
14 expect with dose ranging studies the numbers exposed to
15 those higher doses would be substantially less than the
16 numbers exposed to the dose ultimately selected for
17 pivotal studies in specific age groups. Then we would
18 also evaluate safety data for those vaccine recipients
19 as well.

20 **DR. ARNOLD MONTO:** Right. I'm thinking of
21 studies that actually lower the dose from the ones that

1 are typically used in adults, which create other
2 questions. Thank you. Dr. Kurilla.

3 **DR. MICHAEL KURILLA:** Thank you, Arnold. I
4 actually have a question related to the CDC discussion
5 earlier today on the myocarditis. And the question is
6 right now that adverse event seems to be largely
7 associated with mRNA vaccines, clearly coming out of
8 the Israeli data, which I think they mostly used just
9 one mRNA vaccine. And we have very limited experience,
10 at least in the younger age groups, in this country
11 with anything other than mRNA vaccines.

12 What I'm wondering, though, is there any data
13 on either the J&J or AZ vaccine in younger populations,
14 18 to 25, that the question is is this a class effect
15 of the mRNA vaccines, or is this a broad adverse event
16 related to just the COVID vaccines themselves? Do we
17 have any clue about that?

18 **DR. TOM SHIMABUKURO:** Hi, this is Tom. Can
19 you hear me, first of all?

20 **DR. MICHAEL KURILLA:** Yes.

21 **DR. TOM SHIMABUKURO:** Okay. I can't speak to

1 any AstraZeneca data. I can say there are reports of
2 myocarditis after all of the authorized vaccines. But
3 we're seeing this increased reporting, or unusual or
4 unexpected reporting, is primarily after the mRNA
5 vaccines in adolescents and young adults, mostly in
6 their early 20s, after dose 2. And the clinical
7 features of these are similar to what other groups have
8 observed mainly in Israel and also in the Department of
9 Defense data. So we think that this is something that
10 we're observing primarily in mRNA vaccines, again, in
11 these younger age groups.

12 **DR. ARNOLD MONTO:** And, Tom, the duration of
13 (audio skip) -- the duration from onset -- go ahead,
14 Mike.

15 **DR. MICHAEL KURILLA:** And I'm curious. With
16 the preponderance in males, so when we go to a pre-
17 pubertal group, would you assume that maybe that
18 myocarditis would not be as prominent, or you would not
19 want to make that estimate at this point?

20 **DR. TOM SHIMABUKURO:** Do you mean the male to
21 female ratio?

1 **DR. MICHAEL KURILLA:** Yeah, is it associated
2 with something that would be post-pubertal in terms of
3 a physiologic effect?

4 **DR. TOM SHIMABUKURO:** I'm not that familiar
5 with the specific epi of myocarditis in that group. I
6 can say that the proportion male to female in these
7 older adolescents and in these younger adults, it is
8 similar to what's observed with myocarditis in general.

9 **DR. MICHAEL KURILLA:** Okay.

10 **DR. TOM SHIMABUKURO:** And I can make an
11 assumption that might apply to younger age groups, but
12 I don't know the answer. I don't know the specifics to
13 that.

14 **DR. MICHAEL KURILLA:** Okay. Thank you.

15 **DR. ARNOLD MONTTO:** Before you go, I just want
16 to -- since we're going to be talking duration of
17 follow up, this is mainly two to four days from
18 inoculation?

19 **DR. TOM SHIMABUKURO:** So the symptom onset for
20 most of these cases have been around four days and the
21 overwhelming majority within a week. So there are

1 cases that have an onset beyond that. But in the
2 recent cases in these adolescents and young adults, the
3 onset has mostly been within days and most of them
4 within a week.

5 **DR. ARNOLD MONTO:** Thank you. Dr. Chatterjee.

6 **DR. ARCHANA CHATTERJEE:** Dr. Shimabukuro,
7 actually, this is for you as well. In the dataset that
8 you shared with us -- you shared a lot of data, so
9 thank you for your presentation, first of all. But you
10 went through it fairly quickly, and I want to make sure
11 I understood this particular piece of information
12 correctly. When you showed the cases of myocarditis,
13 pericarditis that occurred in the Pfizer and Moderna
14 recipients, it seemed to be more cases in the Pfizer
15 recipients than in the Moderna group. Did I
16 misunderstand those data, or is that a real thing?

17 **DR. TOM SHIMABUKURO:** So, for the VAERS
18 reports, our spontaneous reporting, our passive
19 surveillance system, there are more reports after
20 Pfizer vaccine. In our active surveillance system, the
21 Vaccine Safety Datalink, there are more reports after

1 Moderna -- or not -- more diagnoses. Those aren't
2 reports. There are more diagnoses after Moderna. So
3 it's a bit mixed.

4 **DR. ARCHANA CHATTERJEE:** Okay. So what piques
5 my curiosity was if this is a class effect, as Dr.
6 Kurilla talked about, and this has something to do with
7 the mRNA platform, these are both mRNA-based vaccines.
8 And so is there a difference do you think in the
9 formulations that result in this, or are these data
10 just too few to make those kinds of analyses at this
11 point in time?

12 **DR. TOM SHIMABUKURO:** So there have been
13 slightly more Pfizer doses used in the United States,
14 and Pfizer is the only vaccine that's authorized under
15 18. So with respect to the spontaneous reporting, I
16 think we need to consider that. With respect to the
17 diagnoses in the Vaccine Safety Datalink, at this point
18 those are still pretty small numbers. So I think we
19 need to wait for the data to mature. In Israel, I
20 believe these are Pfizer cases because that's the only
21 vaccine they used. In some of the other case series,

1 there have been both Pfizer and Moderna related cases.

2 **DR. ARCHANA CHATTERJEE:** Thank you.

3 **DR. ARNOLD MONTO:** Thank you. Dr. Gans.

4 You're muted.

5 **DR. HAYLEY GANS:** Thank you. I had a couple
6 of questions also for Dr. Anderson and Dr. Shimabukuru
7 related to the myocarditis. There was one report that
8 I think, Dr. Anderson, you showed that talked about the
9 myocarditis and broke it down into dose 1, dose 2. And
10 I'm curious to know a couple of things about the dose 1
11 individuals. Did they go on to actually get a second
12 dose, and how did they do with that?

13 And then I'm wondering if there's any data
14 that you can share or know of about the immunogenicity
15 if that was looked at in any of these populations after
16 dose 1, dose 2 so we could start trying to understand
17 if there's any predictors of who might go on and have a
18 more robust immune response. This feels like a sort of
19 hyperimmune response that we're seeing. And with that,
20 the immunogenicity data, is there any data related to
21 looking at sort of cytokine release syndrome because it

1 feels a little like that after COVID disease?

2 **DR. TOM SHIMABUKURO:** So with respect to dose
3 1 cases, who may have received dose 2, I don't have
4 that data. That's certainly something that we can look
5 into. Sometimes in vaccine safety we see this
6 phenomenon where if you have a dose 1 adverse event,
7 you don't get dose 2, or you are less likely to get
8 dose 2. But that's certainly something we can look at.
9 I don't have any information on immunogenicity. I'd
10 have to defer to others on that.

11 **DR. STEVEN ANDERSON:** Yeah, and this is Steve
12 Anderson. I would say for our data we didn't -- the
13 rapid cycle analysis doesn't break it out by dose.
14 It's just all doses in the rapid cycle analysis even
15 though we have access to both doses. We could do that
16 later, but we didn't do that in this initial run.

17 **DR. TOM SHIMABUKURO:** I'll mention in the
18 Vaccine Safety Datalink, our surveillance is all doses
19 as well. At least right now it is. When that separate
20 analysis we did, which was outside of surveillance,
21 that was an additional analysis, that broke it down by

1 dose.

2 **DR. HAYLEY GANS:** So is anybody looking for
3 risk factors? I guess that's what I'm getting at. All
4 we have is a male gender sort of preponderance. And
5 I'm wondering. And some of this might be looked at in
6 terms of actual dose of the vaccine, what dose was used
7 and also the way in which we give it so the schedule if
8 we obviously broaden that. But I'm just wondering if
9 there's any way that we can identify risk factors, or
10 is anyone looking at that?

11 **DR. TOM SHIMABUKURO:** So we're currently
12 following up on the spontaneous reports, doing as rapid
13 a follow up as we can for the reports in 30 and under.
14 And that includes getting medical records. To review
15 the medical records, to confirm information in the
16 reports, sometimes we actually reach out directly to
17 the providers to make sure we get as complete a picture
18 as possible on these cases.

19 We also have a group at CDC called the
20 Clinical Immunization Safety Assessment Project which
21 are researchers at academic research centers and have

1 access to specialists. And we have pulled them in to
2 help us review cases and also to help us assess the
3 issue of myocarditis in general after mRNA vaccines and
4 also look into this issue of mechanistic evidence.

5 So I think we will be able to get more
6 information, at least on the individual patients, and
7 additional information, possibly, on risk factors. But
8 right now, we don't see any obvious risk factors other
9 than, I would say, age, sex, and dose.

10 **DR. STEVEN ANDERSON:** And then for FDA's
11 analysis, we haven't really begun a deep dive into the
12 cases. We haven't identified a signal in our system
13 yet, but the plan would be to do epidemiological
14 analysis. And we just haven't done that yet. But your
15 question about risk factors is a valid one. Thanks.

16 **DR. ARNOLD MONTO:** Thank you. Dr. Offit.

17 **DR. PAUL OFFIT:** Thank you. So this question
18 is ultimately for Dr. Kirking, and it follows up on
19 something that Dr. Rubin had said. So it seems to me
20 what we're trying to do here is determine risk-benefit
21 moving forward for children. And so, in terms of

1 defining the risk of vaccines, we'll discuss how many
2 patients we're comfortable with (phonetic), how big we
3 want those range trials to be, how long safety follow
4 up is.

5 But I think the harder part of this may be the
6 benefit part. Cody alluded to this earlier. Clearly,
7 the numbers of hospitalizations and MIS-C cases are
8 declining.

9 But my bias -- and I'm curious to hear your
10 comment on this, Dr. Kirking -- is that it's summer. I
11 mean, they said (phonetic) it's hard to (inaudible)
12 winter respiratory virus. And I think come winter,
13 we're going to see really how well we're doing in terms
14 of population immunity.

15 I mean, that in concert with the fact that we
16 have variants that are becoming more contagious, which
17 is what bat viruses do as they try and adapt to the
18 human population. We have first the B.1.1.7 variant,
19 now the B.6.1.7 (phonetic) variant which are
20 progressively more contagious which means we need a
21 higher level of population immunity.

1 And the bigger thing to me is that there's 195
2 countries out there, many of which have never given a
3 single dose of vaccine. We still vaccinate children in
4 this country for polio every year even though we
5 haven't a case of polio since the 1970s. I think we
6 are going to have to have a highly vaccinated or highly
7 immune population for years if not decades. And it
8 just seems silly to think that we're not going to have
9 to include children as part of that since they can
10 suffer and be hospitalized and occasionally die from
11 this virus. Three hundred children have died from this
12 virus, at least.

13 Getting back to Dr. Rubin's question, there
14 would be 500 children, roughly, that would die of
15 measles. Far fewer die of varicella, far fewer die of
16 flu, at least now. So I don't know. That -- my sense
17 is (phonetic) that the notion that we are not going to
18 have to vaccinate children going forward, I think is
19 wrong. But I'm curious to hear Dr. Kirking's comments.

20 **DR. HANNAH KIRKING:** Yeah, thank you for the
21 comments. And I think there is a lot of truth to it to

1 think about the population, what's happening around the
2 pockets of unvaccinated kids and what that might mean -
3 - or around pockets of children, whether they're
4 vaccinated or unvaccinated.

5 I would say we can pull a little bit from some
6 of our epi studies that we've done in the field
7 already, where we've (inaudible) school transmission
8 investigations. We've done some outbreak
9 investigations in some summer camp students last
10 summer. And the thing that overwhelmingly I think we
11 learned from kind of investigations of what happens
12 when COVID is introduced into a student population are
13 two-fold.

14 One, in a group of children where it's
15 introduced and there's not a whole lot of mitigation
16 measures, it will transmit throughout. That's one
17 thing. The second thing would be that the background
18 community transmission definitely does affect how much
19 introduction and transmission you will see in a child
20 centric environment. And so just from school
21 transmission work, we did three different locations

1 where we looked very closely at cases introduced and
2 tested holistically around cases in schools. And this
3 was before adults were as highly vaccinated as they are
4 now.

5 And in general, when community background
6 rates were higher, we found more in kids. And when
7 they were lower, we found less in kids. And so I would
8 say those two kind of field epi datapoints kind of go
9 against each other. As community transmission is
10 lower, you schools will do better even if they're
11 unvaccinated. On the other hand, it can spread once
12 it's introduced.

13 And so I think in context of your -- global
14 aspect to your question, we do live in a fairly global
15 society. And so having big pockets of unvaccinated, we
16 would anticipate, potentially, some outbreaks.

17 I think that the other part that makes its way
18 into this that's hard to predict is what other
19 mitigation measures might stay or not stay. And that
20 becomes, also, an important part of the dialog. When
21 we did transmission investigations in schools, largely

1 last winter when case counts were high, the other
2 mitigation measures work.

3 The other way I would say that is that last
4 winter the rest of the respiratory viruses, with the
5 exception of a few, were mostly quiet. So those other
6 mitigation measures, even outside of vaccines, were
7 effective. If we potentially are in a position where
8 some schools or states might decide not to continue
9 with some of those, we might see a very different
10 pattern.

11 **DR. PAUL OFFIT:** Right. All we have to do is
12 just mask, social distance, shut down schools, shut
13 down business and restrict travel, and we're good.
14 There's a price for that but (inaudible).

15 **DR. HANNAH KIRKING:** I think yours is a good
16 point, though.

17 **DR. ARNOLD MONTO:** Thank you. Dr. Pergam.

18 **DR. STEVEN PERGAM:** Thanks, Arnold. Thanks.

19 Dr. Kirking, this is a question for you. I haven't
20 seen much data in children related to the
21 immunosuppressed population. We're looking at outcomes

1 of interest. It's merely focused on generalities like
2 obesity and other demographic factors. There hasn't
3 been as much related to the IRIS population. And in
4 adults, that's clearly becoming a major risk factor for
5 mortality.

6 I worry a little bit that as we're thinking
7 about these data -- and I'm curious your thoughts on
8 this -- that much of what we've come through in the
9 initial phases, these high-risk individuals would have
10 been not in environments like schools or in close
11 contact and so were less likely to become potentially
12 in contact with others that might have been infected.

13 But as that changes and as states become less
14 cautious, we may be putting a number of those high-risk
15 children at risk. And I'm curious if you guys have
16 considered this in sort of the analysis and whether or
17 not you have much data on hospitalizations, mortality,
18 et cetera, in the high-risk groups that might be
19 particularly at risk?

20 **DR. HANNAH KIRKING:** Yeah. I think in terms
21 of your question about data on the high-risk group

1 specific to younger children or the pediatric
2 population, I don't have that information right now.
3 Definitely, we have it to some extent. And how big of
4 data it is or how much signal we can pull out of it, I
5 would have to talk to some colleagues that are leading
6 analyses on that data, specifically. So my apologies
7 for that.

8 I think your point is a good one, though, that
9 there could be high-risk children out there that have
10 been protected over the past year by other mitigation
11 measures, whether that is distancing or school from
12 home or tighter mask recommendations for children
13 and/or adults. So I do think that there could be
14 changing epidemiology coming specifically as pertains
15 to high-risk children if that makes sense. I don't
16 know that I can predict yet what that might look like.
17 But definitely would expect it will change as the
18 overall proportions of (inaudible) cases are right now
19 is also changing.

20 **DR. ARNOLD MONTO:** Thank you. We're going to
21 have a few more general questions before we get on to

1 the discussion topics. And Dr. Fuller, please.

2 **DR. OVETA FULLER:** Yes, thank you. Just a
3 statement, and I'm not sure if this directed to Dr.
4 Fink or Dr. Kirking. But if we think about where we've
5 been with vaccines in this country, they could
6 (inaudible) a lot of disease for a lot of people. We
7 look at measles, mumps, chickenpox, HPV, rotavirus,
8 polio, hepatitis, and we talk about COVID.

9 Children have been protected because they've
10 been home as we were just talking about. And I agree
11 with Paul. As we open up, this virus will not be in
12 adults because adults, most of us, hopefully, will be
13 immunized or in some way protected because of natural
14 infection. So it's going to go to those who are not
15 immunized. And that means the population circulation
16 in children is going to be higher. So we already know
17 that their staying home is not a social -- viable
18 alternative. So I don't see that we have any option
19 except to also protect our children in the best way we
20 know with what we do with vaccinations in this country.

21 So my question is what has been -- and this

1 will get into the later discussion -- what has been the
2 database size that was needed for rotavirus or
3 Gardasil, either EUA or in those cases licensure? And
4 what is the typical follow up? We are still, I
5 believe, in an emergency situation.

6 I think that when this virus goes into our
7 children, which is what it's going to do, that will
8 give it an incubator to change. And so not just to
9 protect them, which is important, but to protect
10 ourselves as well as the global population, I agree
11 with Paul. And I guess I'm asking what has been the
12 precedent for looking at the number in recently
13 licensed vaccines? And I'm not sure who is best to
14 answer this, Dr. Fink or Dr. --

15 **DR. ARNOLD MONTO:** I'm not sure either, but
16 this is a nice segue into the first discussion topic.
17 Anybody, Dr. Fink or Dr. Gruber, or anybody would like
18 to talk in response? And then we'll switch to the
19 first discussion topic.

20 **DR. DORAN FINK:** Yeah, hi. Yeah, Dr. Monto
21 and Dr. Fuller, I'm happy to take this question. So I

1 think these general considerations were touched upon in
2 our briefing document and in my presentation and also
3 in response to an earlier question from Dr. Meissner
4 where I provided some examples. And he asked about
5 some examples. But I'm happy to go over those again
6 because I do think, in agreement, it's an important
7 point.

8 So sometimes FDA approval of vaccines for use
9 in pediatric populations has been the first approval of
10 those vaccines. So they have not previously been
11 studied or approved for use in adults. And in those
12 situations, the safety database has largely been driven
13 by considerations for adequately powered clinical
14 endpoint efficacy trials so into the tens of thousands
15 or multiple tens of thousands of vaccine recipients.

16 And so one example of that recently, was
17 Dengvaxia, the dengue vaccine that was approved a few
18 years ago for ages 9 through 16. There have been, on
19 occasion, safety databases that have ranged into the
20 tens of thousands, 60,000, under 70,000, for a
21 rotavirus vaccine because of the desire to further

1 evaluate and characterize a specific safety concern and
2 in that case, intussusception.

3 On the other hand, in numerous examples where
4 vaccines were first studied and licensed for use in
5 adults and then approved for use in pediatric
6 populations based on an immunobridging approach, the
7 pediatric safety database to support that licensure has
8 been considerably less, somewhere in the range of 500
9 to around 3,000 or so total trial participants exposed
10 to the dose and regimen intended for use under
11 licensure. And that range depends on the age ranges
12 being contemplated for approval as well as other
13 factors.

14 So we talked about the example of Gardasil,
15 the first approved HPV vaccine where we had slightly
16 more than 3,000 vaccine recipients ages 9 to 17 in the
17 case where that approval was concurrent with approval
18 for use in younger adults. So really very little adult
19 safety data other than the thousands of adults that
20 were evaluated in the clinical trial that provided
21 evidence of clinical endpoint efficacy. And then

1 several other examples, Japanese encephalitis virus,
2 oral cholera vaccine, where we had fewer than 3,000
3 total pediatric recipients across age groups
4 supplemented, of course, with data from clinical trial
5 experience and post-licensure use in adults.

6 And then just to round out the answer to your
7 question in terms of precedent for Emergency Use
8 Authorization, we really don't have precedent. These
9 COVID vaccines are the first ones authorized for
10 emergency use.

11 **DR. OVETA FULLER:** But just a final comment, I
12 think we are in an emergency situation. We haven't
13 seen it for these children because they have been
14 isolated or there have been other mitigations. But as
15 we open up again, we won't have those. We don't do a
16 very good job with those. So I think we are in an
17 emergency situation and will be going into the winter.
18 Thank you so much.

19 **DR. ARNOLD MONTTO:** Thank you. And we are
20 going to shift now to the answers to the questions --
21 or the discussion of the specific questions. So the

1 first one up on your screen, "Provided there is
2 sufficient evidence of effectiveness," we are going to
3 be talking about two age groups, 6- to 12-year-olds and
4 2 to less than 6 months of age -- and three groups, 6
5 to 12 years, 2 to less than 6 years, and 6 months to 2
6 years. We're talking both about safety data in terms
7 of sample size and duration of follow up. And we're
8 talking about Emergency Use Authorization and
9 licensure.

10 We also heard in Dr. Fink's introduction that
11 it is possible that we may say that we only want to
12 work towards licensure, that Emergency Use
13 Authorization is not necessary in a particular age
14 group. So I'm opening up the floor to discussion. Dr.
15 Meissner, you're first.

16 **DR. CODY MEISSNER:** Thank you, Arnold. It's a
17 very interesting conversation, but I have a couple of
18 comments. And first, I want to start off by thanking
19 Dr. Fink and Dr. Gruber and others at CBER for their
20 extraordinary leadership during these very, very
21 complicated discussions. And I can't think of anyone

1 who has more integrity and is more thoughtful than you
2 folks are. So thank you for everything that you've
3 done.

4 I agree with Paul Offit. I think we certainly
5 need a pediatric vaccine. That's not the question that
6 we're discussing today. The question, in my mind at
7 least, is at what point will we have sufficient data to
8 justify a pediatric vaccine? Because, after all,
9 children grow up to be adults and we want them to be
10 immunized and immune.

11 But remember, people keep citing high rates of
12 disease in children. The rates in children are four --
13 the hospitalization is four hospitalizations per
14 million children under 18 years of age. That's on the
15 CDC website. That is not an emergency. It is a very
16 low hospitalization rate. And the rates may change as
17 the season changes, but we're starting from a tiny,
18 tiny rate. And I would -- the rates are also falling
19 pretty dramatically among adults and children. So as
20 more people are immunized and become immune from
21 infection, I think it's very likely that we're going to

1 get this pandemic under pretty good control.

2 Now the issue -- so the issue to me is safety.

3 And I don't -- we can look at the 2,000 or 2,200
4 adolescents who are enrolled in the Pfizer vaccine
5 between 12 through 15 years of age -- 2,200, so half
6 got the vaccine, half got placebo. Nobody was
7 hospitalized. Nobody died. And there were some who
8 got URIs (inaudible). So 2,200 is not going to address
9 the issue of safety.

10 I'm worried about myocarditis. And let me
11 just make a comment because I've spoken to a number of
12 cardiologists about this. The way we evaluate
13 myocarditis today is based on gadolinium enhancement of
14 an MRI in a person who has chest pain, elevated
15 troponin levels, tachypnea perhaps. And this method of
16 diagnosing myocarditis is very, very sensitive. It
17 doesn't take much of an insult to the myocardium to get
18 a positive gadolinium scan.

19 But we don't know what that means on a long-
20 term basis. Will there be scarring of the myocardium?
21 Will there be a predisposition to arrhythmias later on?

1 Will there be an early onset of heart failure? I think
2 that's unlikely, but we don't know that. And so before
3 we start vaccinating millions of adolescents and
4 children, it is so important to find out what the
5 consequences are because COVID-19 disease is
6 disappearing in adolescents and children. And I think
7 we have to be so clear about what we're dealing with.

8 Let me make one more point. In 2003, there
9 was a publication in *JAMA* regarding myocarditis
10 following the Dryvax vaccine, the smallpox vaccine
11 which is, of course, a live vaccine. But in that
12 situation, the military -- it was given to young
13 recruits. The rates of myocarditis in the military
14 young men -- because it was mostly men in those days --
15 was 2 per 100,000. And after the Dryvax vaccine the
16 rates were 7.8 cases of myocarditis in the 30 days
17 afterwards. So there was a three-fold increase. And
18 in fact, Dr. Tony Fauci wrote an editorial in that same
19 issue of *JAMA* discussing these rates of myocarditis.

20 So I am really concerned that the FDA may be
21 not insisting on a full BLA, which to me means at least

1 12 months, maybe even 18 or 24 months of follow up in
2 children and adolescents, before they are recommended
3 to receive this vaccine. I do not feel we can justify
4 a EUA including children under an Emergency Use
5 Authorization. The burden of disease is so small, and
6 the risks are just not clear. We don't know. Once
7 we've clarified it, then we definitely want to go ahead
8 with this immunization program.

9 There are other problems as we've mentioned.
10 We don't know what the risk is with co-administration.
11 What happens if it interferes with other vaccines? I
12 don't think it will. It's hard, as has been said, it's
13 hard to imagine a biological explanation, but it has
14 happened with other vaccines. So I think caution
15 should rule the day here. Thank you, over.

16 **DR. ARNOLD MONTO:** Dr. Meissner, before you
17 leave, are your comments up to 18 years of age?

18 **DR. CODY MEISSNER:** Yes, sir, they are. I'm
19 uncomfortable about administering because so few
20 children up to 18 have been enrolled. And we admitted
21 a 12-year-old boy over the past weekend, two days after

1 his second mRNA vaccine, with a troponin level greater
2 than nine, very high level, and evidence of
3 myocarditis. This is not -- I cannot believe this is a
4 random occurrence. There is an occurrence. It has to
5 be included in an informed consent if we're going to
6 move ahead. I think it needs a very careful safety
7 evaluation before we recommend it because the risk of
8 disease is so low in this group. Over.

9 **DR. ARNOLD MONTO:** Thank you. Dr. Levy.

10 **DR. OFER LEVY:** Hello, and -- yeah, thank you
11 for the opportunity to make some comments. I wanted to
12 make some comments about the big picture, pick up on
13 some of the themes that Paul Offit brought up. I think
14 it is a very complicated series of considerations in
15 the big picture. And we've heard a lot both in the
16 public commentary and now from Dr. Meissner about the
17 very cogent arguments to go slow, be careful, and keep
18 in mind the relatively low burden of disease.

19 On the other hand, as Paul pointed out, we're
20 reaching summertime here, which is the nadir for most
21 respiratory viruses. I think the truer test will be

1 how do the fall and winter look? We've got to keep
2 that in mind.

3 I know we're not focusing on variants here,
4 but they're out there, and some of them do spread
5 easier. And so we have to keep that mind. And
6 finally, from an ethical perspective, while it's true
7 that we have to focus on the benefits to the population
8 that we're thinking of providing a vaccine for, in the
9 case of children, reaching herd immunity as a nation
10 across all age groups also directly benefits children
11 because the economy opens up, schools open up better.
12 And so I think it's a very complicated topic. The
13 themes have been touched on, but I wanted to put that
14 out there on the big picture.

15 More specifically, in terms of the clinical
16 trials -- and I know there's been some of this -- the
17 dose ranging and the granularity of the doses may be
18 very important with the mRNA vaccines. And I hope FDA
19 continues to work with the sponsors to encourage
20 granularity in dosing and follow up to see if they can
21 hit sweet spots where one benefits from the

1 immunogenicity and perhaps less of the potentially
2 associated myocarditis or other adverse events of
3 special interest.

4 And then from a research perspective and a
5 very important translational perspective, let's try to
6 better understand what this potential association with
7 myocarditis is. Our research group, at the Precision
8 Vaccines Program and others, Mihai Netea in Europe and
9 others, have opened up a field of innate memory. It's
10 logical we measure the antibody response to the mRNA
11 vaccines to the spike. We believe that protects us.

12 But these vaccines also alter the innate
13 immune system. And Mihai Netea just posted a study
14 from immunized adults that shows that if you take their
15 blood after mRNA immunization, mRNA vaccine -- this was
16 the Pfizer product -- there is altered innate response
17 in the blood to stimulation with pattern recognition
18 receptor agonists like TLR agonists. So these vaccines
19 may have innate immune altering effects, and that could
20 conceivably relate to myocarditis. That's just
21 theoretical, but we know, for example, with viral

1 myocarditis that these same innate pathways are
2 triggered. So that's a possible connection.

3 But my question to FDA is what is the
4 possibility of encouraging the sponsors to gather more
5 information about the innate immune activating effects
6 of these vaccines because more needs to be learned
7 about that. So those were several opinions, but they
8 ended up with a question to FDA in terms of what are
9 their interactions with the sponsors around
10 understanding innate immune effects of the vaccine?

11 **DR. ARNOLD MONTO:** Thank you. Dr. Kim.

12 **DR. DAVID KIM:** Well, I certainly appreciate
13 the perspectives that Dr. Offit, Dr. Meissner, and Dr.
14 Levy just presented. And I'd like to add a comment,
15 just a very simple -- actually a rhetorical question.

16 There is a cost. And we've seen that -- with
17 myocarditis and other rare side effects -- that there
18 is a cost to vaccinating the population. And I think
19 we should also consider -- and I'm sure that's what all
20 the members as well as the watching public are thinking
21 as well -- what is the cost of not vaccinating? What

1 is the cost to our children if we do not proceed with a
2 vaccination program, not only in terms of protecting
3 their health, but for the larger public health? So I
4 throw that out there for consideration.

5 And I have a question for Dr. Fink, and
6 perhaps Dr. Anderson can also comment. In the adverse
7 event evaluation -- the, perhaps, post-marketing
8 evaluation -- that there's a comparison group. And Dr.
9 Fink mentioned that the comparison group will be
10 followed as long as feasible and also, that numbers
11 like that that Dr. Fink presented that identified
12 median of six months, or what have you, as a follow up.

13 To contextualize these issues, vaccine
14 confidence, vaccine acceptability and vaccine uptake,
15 they're all closely related and they move in the same
16 direction. And the more we can do to promote
17 acceptability, confidence, and promoting the use of the
18 COVID vaccine, the better off we're going to be in the
19 long run, obviously.

20 And towards that, vaccine safety has been
21 identified as one of the primary, if not the primary

1 reason, why there is a lag, perhaps, a lag in the use
2 of vaccine and in gaining vaccine confidence and
3 vaccine acceptability. So the more we can do to
4 promote confidence in addressing the risk of COVID-19
5 vaccine, the better off we're going to be.

6 So what I'd like to ask Dr. Fink and Dr.
7 Anderson -- that I realize that there's precedence,
8 there are set languages that we use. But COVID-19 is
9 obviously not -- does not allow us to get fixated on
10 what was done in the past, necessarily. So moving
11 forward, I wonder if you would consider using perhaps a
12 different frame of reference for discussion question
13 one?

14 It also applies to the second and the third
15 questions regarding the duration of follow up. And
16 that is rather than using follow as long as feasible,
17 what if FDA were to be more prescriptive in saying that
18 the adverse event evaluation in the comparison group
19 should be followed for at least a year, at least two
20 years -- something akin to what Dr. Meissner was saying
21 earlier, perhaps as long as three, four, five years to

1 allay the public about the fears of not knowing or not
2 addressing the long-term effects, long-term adverse
3 effects of COVID-19 vaccination program?

4 And by the same token, rather than -- there
5 were several slides that Dr. Fink presented. I think
6 the first one was slide number 10, 11, 12, somewhere
7 around there, where median was used, median of -- and
8 what if we replaced the word "median" follow up with
9 minimum of six months so a median of six months versus
10 a minimum of six months to again -- of course, this
11 would delay the outcome analysis by several weeks.
12 But, again, this would help reassure the group -- the
13 providers, and the public that a more definitive set of
14 guidelines or set of rules are being used to ensure
15 vaccine safety and promoting the use of vaccines for
16 the public.

17 **DR. ARNOLD MONTO:** Before you answer, Dr.
18 Fink, may I just add an additional point? And that is
19 without either Emergency Use Authorization or a
20 licensure with the event frequency that we have, how
21 many cases will we have to evaluate over these time

1 periods? Because I think that becomes an issue as well
2 if we have the kinds of numbers that are going to be in
3 (phonetic) these evaluations before either Emergency
4 Use Authorization or licensure. And is the solution
5 some better kind of post-marketing surveillance to
6 answer some of these questions simply because of the
7 low frequency of these events? Please.

8 **DR. DORAN FINK:** Thanks, Dr. Kim. So let me
9 try to answer your two questions in order, first, the
10 language of "as long as feasible" for evaluation of the
11 control group. So this is a theme that is repeated
12 from our October VRBPAC meeting and our product
13 specific VRBPAC meetings for authorization for use in
14 adults and, in the case of the Pfizer vaccine, going
15 down to age 16.

16 The reason we say "for as long as feasible" is
17 because once a vaccine has been authorized for
18 emergency use by FDA and recommended for use by CIC
19 (phonetic), if one were to then insist that all trial
20 participants who were originally randomized to placebo
21 remain in follow up without access to the vaccine, then

1 you run into serious ethical issues. And we've heard a
2 number of very strong viewpoints expressing the reasons
3 why that's problematic.

4 So when we say "as long as feasible," that's
5 not to suggest that those control recipients would
6 cease to be followed at all in the trial. It means
7 that at some point when the vaccine is made available
8 and recommended for use, it becomes very difficult to
9 argue against providing access to that vaccine to the
10 placebo recipient. And so, ideally, that access would
11 be given under the conditions of participation in the
12 clinical trial, and they would continue to be followed
13 in the context of the clinical trial.

14 **DR. DAVID KIM:** If I may, but in the context
15 of what we were discussing in earlier VRBPAC meetings
16 as far as the unmasking of the control group, I think
17 they were to be offered the vaccine for crossover
18 monitoring. And along those lines there would be those
19 who have not received the vaccine.

20 And so I'm talking about an opportunity where
21 there's a reasonable chance that we may be able to

1 study -- a long study -- adverse events occurring over
2 a longer period of time. That rather than self-
3 limiting the duration of follow up with as long as
4 feasible, to be more prescriptive in identifying a
5 period of time that would suit, that would allow us to
6 gain more information for long-term adverse events.

7 **DR. DORAN FINK:** And I do think that we're on
8 the same page, that we do want all trial participants
9 to be followed for as long as possible, whether they are
10 initially randomized to vaccine or randomized to
11 placebo and then at some point choose to be unblinded
12 and crossed over if the vaccine could be made available
13 and recommended. So I couldn't agree with you more
14 that having as robust a duration of follow up as
15 possible is important.

16 Having said that, there is cost to waiting for
17 very long follow up before taking any kind of a
18 regulatory action to make a vaccine available. And so
19 we do have to be realistic about the duration of follow
20 up that we would expect prior to (audio skip) warranted
21 considering that. And remaining follow up would need

1 to be done after authorization or licensure as well as
2 in the context of post-authorization or post-licensure
3 use.

4 The other question that you asked was about
5 this notion of a median of six months of follow up.
6 Here, the intent was to really be parallel with the
7 framework that we established and that the VRBPAC
8 endorsed back in October for clinical trials in adults.
9 Clearly, those adult efficacy trials have many more
10 trial participants than an immunobridging trial in a
11 specific pediatric age group would have.

12 But in presenting the numbers that we've
13 discussed with vaccine manufacturers in terms of
14 overall safety database and numbers for specific age
15 groups, those numbers actually do reflect what would be
16 potentially an acceptable number of vaccine recipients
17 with at least six months of follow up. So if you take
18 1,000 vaccine recipients with a median of at least 6
19 months, that means at least 500 (audio skip) vaccine
20 recipients (audio skip) for a specific age group.

21 If your concern or your interest is detecting

1 very rare adverse events, then increasing from 500
2 subjects with at least 6 months to 1,000 subjects with
3 at least 6 months really isn't going to accomplish
4 anything. Increasing to even 10,000 would likely not
5 accomplish anything either and thus the need to
6 consider what additional safety evaluation could be
7 accomplished in the post-authorization or post-
8 licensure period.

9 Additionally, when thinking about prolonged
10 duration of follow up prior to making a vaccine
11 available, again, the question is are there specific
12 events that would not become apparent or would be
13 difficult to characterize in a reasonable number of
14 subjects that could be evaluated in the pre-licensure
15 period with a much longer duration of follow up? The
16 concerns that we're talking about now largely manifest
17 in the fairly short-term after vaccination.

18 And so I think we're right to focus on those
19 concerns. But I think we need to be realistic and
20 really question what additional information would a
21 much longer duration follow up prior to making the

1 vaccine available, what information would that provide
2 in terms of the benefit and risk? Thank you.

3 **DR. ARNOLD MONTA:** Thank you. And then I'm
4 getting alerts that we have 15 hands raised, and the
5 clock is moving on. So I'm going to move on. I think
6 the critical thing we heard was with an infrequent
7 outcome -- and we'll use myocarditis as an example --
8 long-term follow up of the small number of events isn't
9 going to give us a whole lot. And that is our dilemma.
10 In terms of not having approval or licensure, then if
11 you don't have use, then you're not going to have
12 events to follow. And I recognize the problems that
13 that creates.

14 Dr. Rubin, please. And I hope you're -- from
15 now on, since so many people have their hands raised,
16 please try to keep your questions focused -- or
17 comments. They don't have to be questions.

18 **DR. ERIC RUBIN:** Thanks, Dr. Monto. I've
19 heard what people said, and I listened carefully to
20 what Dr. Meissner said. And I agree with all of his
21 suppositions and come to completely the opposite

1 conclusion. Remember here that we are deciding whether
2 or not this vaccines becomes available. We're not
3 deciding how it's used.

4 And as we've heard from a number of people,
5 there's not much disease right now. It's not clear in
6 the fall whether or not this will be a useful vaccine.
7 But I will point out that we use a lot of vaccines for
8 which there's very little disease, as Dr. Kirking
9 mentioned, for public health reasons. We don't think
10 that that's a -- we are willing to make that trade off
11 with an individual benefit versus a community benefit.
12 But, sure, we don't know what's going to happen. I
13 think that's precisely the reason why we want to have
14 these in our arsenal.

15 Because we give an EUA to the vaccine, doesn't
16 mean we have to use it. And I think we would have to
17 think hard about how to use it given all of the
18 concerns that have been raised. But just to follow up
19 with on what you just said, we're never going to know.
20 Remember that the data that Dr. Shimabukuro presented
21 shows that these huge confidence intervals are not even

1 -- we're all worried about myocarditis. We're not even
2 sure that it's an association right now. It's very
3 hard to tell. And that's over hundreds of millions of
4 doses given in the U.S. alone.

5 The last thing I'd say about safety is this
6 isn't a blank slate. We're not going in with a new
7 vaccine to kids. We're going in with a gigantic base
8 of experience now in adults. And that experience has
9 suggested that there may be rare side effects. But
10 there aren't common side effects, at least for the mRNA
11 vaccines or actually for any of the vaccines at this
12 point. So our prior probability going into this of
13 having side effects that we're really going to miss,
14 even in the smaller studies that we're talking about,
15 is low.

16 I hate to not have the tool because, as people
17 have said, when we get back in September and kids are
18 back in school and people are back indoors and in
19 certain parts of the country vaccine rates are very
20 low, who knows what things are going to look like? And
21 I would just like to have the ability to use this

1 vaccine if we need it. If now we set preconditions
2 that are not achievable over a reasonable amount of
3 time, we won't have it.

4 **DR. ARNOLD MONTO:** Thank you, Dr. Rubin.
5 Given the number of people who want to express their
6 opinions and the complexity of the questions we have
7 and their multiple parts, I think it might be useful
8 first to look at the three different age groups that
9 are involved in this question and try to comment on
10 whether there would be different answers to each of the
11 three different age groups, let's say starting from the
12 bottom, the under six months to two-year-olds and
13 working our way up to try to come to some degree of
14 consensus of importance to have the vaccines, as Dr.
15 Rubin just said, available for use.

16 So I'm going to ask everybody to lower their
17 hands and try to focus on that question so that we can
18 try to move forward and come to some kind of, if not
19 consensus, then a variety of different opinions so that
20 the Agency can be informed by our opinions. So now
21 anybody who wants to comment, Dr. Cohn, you got there

1 first.

2 **MR. MICHAEL KAWCZYNSKI:** And then, Arnold,
3 just a reminder every once in a while, if you don't
4 mind turning your camera on?

5 **DR. ARNOLD MONTO:** Okay. Yeah, I'm hiding.

6 **DR. AMANDA COHN:** Thanks. To echo Dr. Rubin's
7 comments, I also agree that continued duration of
8 follow up does not help us in this situation in terms
9 of having confidence, in terms of the safety for these
10 age groups. So I also came to an opposite conclusion
11 as Dr. Meissner, and that it's not duration of follow
12 up that I'm concerned about, it's the size of the
13 cohort that's studied.

14 And I think when you break it down into age
15 groups, you could potentially consider, as you get
16 younger, asking for an increasing size of a cohort to
17 study. So 1,000 may be sufficient for 6- to 12-year-
18 olds who are more like adolescents. But we may want to
19 expand the cohort size as we get into that younger
20 group where there are such -- can be differences even
21 by year of life.

1 **DR. ARNOLD MONTO:** And as we go through this,
2 we have question number three -- or topic number three,
3 which is a follow up after approval or licensure. Keep
4 that in mind as something that's going to be there
5 after we either recommend approval or licensure. Dr.
6 Offit.

7 **DR. PAUL OFFIT:** Right. I agree with Drs.
8 Cohn and Fink and others regarding that the issue is
9 not one of how long we follow up but how many people we
10 want to follow. And with that, it comes to what level
11 of risk are we willing to accept? At some level,
12 having lived through the rotavirus experience, I think
13 it is instructive. The RotaShield was introduced in
14 the United States in 1998 and was found to be a rare
15 cause of intussusception, roughly 1 per 10,000, 1 per
16 30,000 infants -- this was given at 2.6 months of age -
17 - developed intussusception.

18 For a disease that killed between 20 and 60
19 children a year in the United States -- babies a year
20 in the United States, that was considered unacceptable.
21 That risk was considered unacceptable even though you

1 probably had a 5 to 10-fold greater risk of dying from
2 rotavirus in the U.S. than dying from intussusception,
3 that risk was considered unacceptable.

4 And so two more trials were done seven to nine
5 years later. The first with RotaTeg was 70,000, the
6 second with Rotarix was 60,000, which then ruled out a
7 risk that that -- ACIP was comfortable with saying,
8 okay, we don't have this level of risk. But then when
9 those two vaccines, both RotaTeg and Rotarix, got into
10 the real world and were given to hundreds of millions
11 of people, we found that those two vaccines also caused
12 intussusception but at a much, much lower rate than was
13 seen with RotaShield.

14 So it's not an issue of avoiding all risk.
15 It's an issue of what level of risk are we willing to
16 accept, which is going to dictate how big we want those
17 trials to be. And I agree it is not amount of length
18 of follow up, it's a matter of what the size is. And
19 those size are going to be determined (phonetic) to
20 some extent by the different age groups which then have
21 different risks regarding just COVID itself (phonetic).

1 **DR. ARNOLD MONTO:** And would you suggest some
2 numbers? I put you on the spot.

3 **DR. PAUL OFFIT:** I'll pick a number.

4 **DR. ARNOLD MONTO:** Yeah, okay, you pick a
5 number anyway.

6 **DR. PAUL OFFIT:** Younger children, I would
7 think -- I will say 10,000. As you get to older
8 children, I would be between 5- and 10,000. But I'm
9 making that up and didn't have much time to think
10 about. I would love to hear what other people think,
11 especially Dr. Fink, about what numbers they would be
12 comfortable with.

13 **DR. ARNOLD MONTO:** Dr. Chatterjee or Dr. Fink,
14 do you want to jump in?

15 **DR. DORAN FINK:** I think we're interested in
16 hearing the discussions of safety database size and
17 input from other members of the VRBPAC to help inform
18 our perspective in our decision making. I think we've
19 laid out what we have accepted in the past for other
20 preventive vaccines authorized for use in these age
21 groups. And if there are compelling reasons to take a

1 different approach for these vaccines, then we would
2 like to hear those.

3 **DR. ARNOLD MONTO:** And in some ways, given
4 that this is age de-escalation, these are not going to
5 be parallel in terms of age groups necessarily because
6 that's another consideration. We will have information
7 from the previous one, correct?

8 **DR. DORAN FINK:** Correct.

9 **DR. ARNOLD MONTO:** Dr. Chatterjee.

10 **DR. ARCHANA CHATTERJEE:** Thank you, Dr. Monto.
11 I have a couple of quick comments to make and actually
12 a couple of questions. It's interesting that I was
13 going to bring up the rotavirus experience, Paul. So
14 I'm glad you went through that because that is
15 informative, I think, in terms of us understanding the
16 numbers you need in a database versus how much risk we
17 can tolerate?

18 When I saw this issue come up -- and it's
19 still up there on my screen -- I looked at the database
20 size and I thought to myself, more and for the
21 duration, longer. And those were originally (phonetic)

1 the only two things that came to my mind. Jokes apart,
2 I think that this requires probably some sort of
3 statistical modeling to help us understand better what
4 the database size actually needs to be.

5 I agree with both Dr. Cohn and Dr. Offit that
6 as you get to the younger age groups, you probably need
7 more to be able to pick up at least on some of those
8 less frequent adverse events.

9 I also think it's important for us, especially
10 in that six months to two year cohort, Dr. Monto, that
11 we do consider concomitant use of other vaccines.
12 Because the vast majority of pediatric vaccines are
13 actually administered in that age group.

14 And while there may or may not be
15 interference, there may be increase -- from a safety
16 standpoint, there may be increased adverse reactions
17 that occur. I think that in order to have some
18 confidence in saying that those things are not likely
19 to increase the adverse events that occur in that age
20 group, I think it would be important to have a bigger
21 cohort in the younger age group.

1 **DR. ARNOLD MONTO:** Thank you. Dr. Sawyer. I
2 think you're muted --

3 **DR. ARCHANA CHATTERJEE:** We can't hear you,
4 Dr. Sawyer.

5 **DR. MARK SAWYER:** All right, thank you letting
6 me make a few quick comments. I do agree with those in
7 general who think we need these vaccines sooner rather
8 than later in children. I think that it's really
9 challenging to predict what's going to happen with this
10 infection. And I'm pretty sure we're going to need the
11 pediatric component of immunity to create the herd
12 immunity we need given the number of unimmunized adults
13 that are still going to be around given what we've seen
14 so far.

15 Obviously, we need to follow the myocarditis
16 story very carefully, and that might change the
17 equation. I'm going to put out a lower number than Dr.
18 Offit did. I don't think we're going to find rare side
19 effects in the clinical trial easily and especially the
20 really rare side effects as has already been stated.
21 And so I'm thinking something in the 3- to 5,000 range

1 would tentatively make me comfortable. We have very
2 robust safety systems for evaluating vaccine post-use,
3 post-release, licensure or EUA. And those will capture
4 unusual, middle to very rare side effects.

5 And the last thing I'll say is that on a
6 relatively minor point for the very youngest cohort six
7 months to two years, we need to have a big enough
8 database to have a very good sense of fever after
9 vaccine because that's an age group where febrile
10 seizures are common. And when we get to
11 coadministration with other vaccines, we're going to
12 aggravate that. And that is a public perception issue
13 that is going to undermine confidence. So I really
14 want to be comfortable in knowing what the rate of
15 fever is after vaccine in the youngest cohort. Thank
16 you.

17 **DR. ARNOLD MONTO:** And, Dr. Sawyer, just to
18 clarify, you're talking about vaccinated individuals
19 and not vaccinated plus placebo?

20 **DR. MARK SAWYER:** Yes, I'm interested in --
21 well, I'm interested. We need a comparison of fever in

1 vaccinated persons in order to really (inaudible) --

2 **DR. ARNOLD MONTO:** Right. But when you come
3 up with the numbers of 3,000 to 5,000 or something like
4 that, that's vaccine recipients?

5 **DR. MARK SAWYER:** Yes, but as Dr. Offit did, I
6 also just made up this number, obviously.

7 **DR. ARNOLD MONTO:** Well, obviously. That's
8 the problem. Dr. Fink, yes.

9 **DR. DORAN FINK:** And can I also ask for
10 clarification? Are you talking about 3- to 5,000 per
11 age group, or are you talking about 3- to 5,000 overall
12 appropriately represented by various age groups?

13 **DR. MARK SAWYER:** I was thinking overall. But
14 in terms of the last part of your question about
15 appropriately represented, I'm certainly interested in
16 the notion that others have already stated, that the
17 younger group may need a slightly larger representation
18 to find things. And so it may not be evenly balanced
19 across the age spectrum.

20 **DR. ARNOLD MONTO:** Thank you, Dr. Sawyer,
21 that's very helpful. Dr. Wharton.

1 **DR. MELINDA WHARTON:** Thank you. I share
2 others concerns about the unpredictability of the
3 current situation. I think we can't assume that
4 disease will stay low. And I'm very concerned that as
5 children return to school, as things continue to open
6 up, and as we go into fall and winter that we could
7 have a very different epidemiological situation and
8 really need the tool of a vaccine for children. So I
9 do think there's urgency for the pediatric vaccine
10 development to proceed in a stage-wise manner from the
11 older age groups to the younger age groups.

12 I think one extraordinary difference in this
13 program is the very robust data we have on use of the
14 current vaccines with hundreds of millions of doses
15 given. And so we're adding incremental knowledge to
16 already a very large and robust database on safety and
17 efficacy. So I actually am quite comfortable with the
18 approach outlined in the FDA's briefing document with
19 safety databases of 1,000 in each of the three proposed
20 age strata and the proposed follow up of a median of
21 two months for the EUA and six months for licensure.

1 I think that's thoughtful. And it seems like
2 the challenges of doing larger clinical trials could
3 result in a process that was so much slower that there
4 would be risks that we would not have these tools
5 available when we need them.

6 **DR. ARNOLD MONTO:** Thank you. Dr. Gruber, you
7 have your hand raised, I notice.

8 **DR. MARION GRUBER:** Yes, I just wanted to make
9 a comment that, however, was just made by Dr. Wharton.
10 And because I'm very appreciative that the Committee
11 really takes courage to throw out numbers here, and we
12 have asked (phonetic) to do so. At the same time, of
13 course, we're hearing we need the vaccines. We need
14 them soon in children because we do not know what the
15 virus will be doing in fall and kids are back in school
16 and people are indoors.

17 And we are in a very difficult position at FDA
18 to really weigh that, the availability with the desire
19 to do clinical trials in thousands of pediatric
20 subjects. So I wanted to actually now echo what Dr.
21 Wharton just said, there is going to be the very

1 difficult balance to strike. If we wait too long and
2 do these large clinical trials with large numbers of
3 pediatric subjects, we may not be ready to have these
4 tools available when we need them.

5 And I had one more question. And that is when
6 people say we need these vaccines available because we
7 cannot predict this virus and what will happen in fall,
8 is the thinking that we would need them available for
9 all these pediatric age groups that we're discussing
10 here, i.e., 6 months to 18 years of age? Or can we say
11 let's have the data, let's accumulate the data for --
12 and I'm now making this up -- 5- to 12-year-olds and
13 perhaps in 2- to 5-year-olds but leave the very young,
14 the infants and toddlers out of this equation for now?
15 So I would like for the Committee to comment on that
16 and clarify that. Thank you.

17 **DR. ARNOLD MONTO:** Thank you, Dr. Gruber.
18 Could I get some help, Mike? I lost my connection.
19 Could you call on the next speaker, please?

20 **MR. MICHAEL KAWCZYNSKI:** Sure. Looks like
21 Pamela McInnes.

1 **DR. PAMELA McINNES:** Yes, thank you. I agree
2 with a lot of what Melinda had to say, and several
3 other people. I want to view this as a really
4 phenomenal opportunity right now, while some of the
5 disease pressure is off, to actually gather the data.
6 Let's get them. At least let us have very well
7 characterized safety profiles in these different
8 populations.

9 If I understand the May 10, 2021 extension to
10 12-year-olds -- and maybe Dr. Fink can clarify this for
11 me -- but I thought there was something like 2,250
12 participants split between vaccine and placebo in a
13 randomized control trial 12-to-15 years of age. And
14 you had safety follow up for a median of two months
15 following second dose. And then you had your
16 immunogenicity was non-inferior to the older age group,
17 and you had the number of cases. So those parameters
18 came together. So if, I think, they were split 50-50,
19 something like 1,150 people received vaccines?

20 If that's true, I don't think that number can
21 be smaller for any of the individual groups. And,

1 hopefully, it would be a little bit bigger. I don't
2 think it needs to be unreasonably bigger, but I don't
3 think it can be less than what you did for extension to
4 12-year-olds. And this was done and so this set a
5 precedent. And I think we have more comfort in 12-
6 year-olds being physiologically closer to the
7 (inaudible) database we have now in adults than we do
8 for younger children. So I really think it's got to be
9 bigger.

10 Do I think it needs to be 5,000? No. So I
11 think you might be looking around at a minimum of 1,500
12 vaccine recipients in the next group down.

13 In answer to Marion's question, I'm very
14 uncomfortable with having a priority focus on Emergency
15 Use Authorization for this vaccine type in the current
16 situation and in pediatrics. And if we took the time
17 to say this is not going to be the priority under EUA
18 but rather to focus on the quality of data and the
19 amount of data that would hopefully support actual
20 licensure, I think takes a little pressure off, assures
21 quality of the study, and paces things.

1 Not everything can be the priority. So I
2 would focus on the next step down in children, and I
3 would like to gather the data, with time, in younger
4 children and in toddlers, but it would not be my
5 highest priority right now.

6 **DR. ARNOLD MONTO:** Before you go, Dr. McInnes,
7 could you say whether your preference of not using
8 Emergency Use Authorization go (phonetic) is in all
9 three age groups?

10 **DR. PAMELA McINNES:** It is.

11 **DR. ARNOLD MONTO:** Okay. Dr. Nelson.

12 **DR. MICHAEL NELSON:** Thank you. This is a
13 tremendous conversation, extremely important. Let me
14 first state -- by stating that waiting for a crisis to
15 pursue EUA might be dangerous for us. So I agree that
16 we don't need to make it the focus of the conversation.
17 But I do think we at least need to lay the groundwork
18 and pathways so that an EUA could be enabled should the
19 need arise in the future.

20 Dr. Gruber, I'm laughing because I had the
21 exact same age group distinctions set down for me as

1 well. Taking into social considerations of the highest
2 risk category as we enter into the fall season, I do
3 believe that 5- to 12-year age group is probably the
4 one that we should focus on. And the discrimination
5 between ages five and six is probably going to be
6 fairly minimal. I would not lump the six-month to age
7 five group together. I would certainly keep them
8 distinct in the current ones of the two -- two years of
9 age and keep two to five years as a separate group.

10 Those lower two groups, I think do need larger
11 numbers given four criteria or four emergencies over the
12 last several months with a decreased tolerance, from
13 compassionate testimony from the public and what we've
14 heard, increased appreciation of rare adverse events,
15 as we've heard during the discussion today. And
16 certainly, the increased complexity of coadministration
17 and the ability to actually discern safety data in the
18 midst of coadministration is going to complicate matters
19 significantly. And I think we're going to need larger
20 numbers for that.

21 And the other factor that may not have been

1 the case in previous vaccine approval is the reliance
2 on immunobridging. So I think, combined with those
3 four factors, we are going to need larger numbers
4 particularly for the two lower age groups, maybe not as
5 necessarily for the age 5 to 12 group, or maybe we can
6 get away with 1,500 or so. But I think you're looking
7 closer to 3,000 for those two younger age groups in my
8 estimation.

9 And I do want to give a word of thanks to --

10 **DR. ARNOLD MONTO:** Total or age group?

11 **DR. MICHAEL NELSON:** Say again?

12 **DR. ARNOLD MONTO:** Total or group?

13 **DR. MICHAEL NELSON:** So the --

14 **DR. ARNOLD MONTO:** The two younger ones.

15 **DR. MICHAEL NELSON:** The two younger ones. I
16 think it's 1,500 each just to be perfectly honest --

17 **DR. ARNOLD MONTO:** Okay. Thank you.

18 **DR. MICHAEL NELSON:** -- is my recommendation.

19 I do want to state and congratulate the FDA for paying
20 such close attention to rare adverse events to vaccine
21 and the transparency with which they're approaching

1 this issue. Fully appreciate you're not going to power
2 study to identify them a priori, but laying the
3 groundwork to be able to follow them over time is
4 important.

5 Having been engaged in the rollout of the
6 smallpox and anthrax vaccinations and seeing the
7 similarities emerge that have, once unpredicted and
8 probably low risk, a side effect actually turned into
9 something that really informed how the vaccine was used
10 programmatically is the direction we need to go. And I
11 wouldn't jump to conclusions with regards to
12 mechanistic studies but enable them by having high
13 quality studies that actively assess for the symptoms
14 of myopericarditis and actually also stratify those
15 case definitions.

16 Our experience with adjudicating cases of
17 suspected myopericarditis was very difficult, and it
18 remains very difficult. And it can be very gray in the
19 way of distinguishing (inaudible). So I would
20 encourage not dismissing the prehospitalization group
21 that actually develops myopericarditis because we don't

1 know what those outcomes are. And putting active
2 surveillance in that looks for that prehospitalization
3 (inaudible) group is going to be important for our
4 understanding of risk.

5 **DR. ARNOLD MONTO:** Dr. Dodd.

6 **DR. LORI DODD:** Okay, can you -- I don't know
7 if you can -- okay, thank you.

8 **DR. ARNOLD MONTO:** We got you.

9 **DR. LORI DODD:** All right, great. So I just
10 want to say a few things. First, I agree the
11 assessment of risk is clearly a moving target, and we
12 do need to be ready to quickly make decisions should
13 the risk-benefit pivot. But when I hear numbers thrown
14 around like 1,000 to 1,500, as a statistician, I'm sort
15 of scratching my head asking what are we going to learn
16 with that additional 500? And if we're talking about
17 (audio skip) really not going to learn much of
18 anything.

19 And so one question back to the Committee is
20 what are you expecting to learn with the additional
21 500? Even if you go up to 5,000, I would argue there

1 is something additional gained, but I think we would
2 need to understand from you all what it is we're trying
3 to gain. And then we can come up with an appropriate
4 sample size. So from where I sit, I don't see a big
5 difference from 1,000 to 1,500 in terms of what we
6 would gain.

7 And I guess I would like to ask Dr. Anderson
8 from his perspective as somebody who's been doing a lot
9 of thinking about the monitoring post-marketing, if we
10 do have these rare events, then what we need to do is
11 really just make sure we're monitoring these things
12 very, very closely, where we'll get lots of
13 vaccinations. And then we're going to monitor for
14 these rare events. So that was one question for Dr.
15 Anderson in terms of the tradeoffs between adding more
16 to a randomized control study that in my assessment
17 probably doesn't add much to our risk assessment, at
18 least for the rare events that we're talking about.

19 And then the other question is we're going to
20 learn a lot from the recent rollout of vaccinations to
21 the 12+ age group and surely that's going to tell us

1 something from the post-marketing surveillance of
2 those. And so I think as that rolls out, we're going
3 to learn something, and we're going to have to adapt
4 our thinking. So I don't know, Dr. Anderson, if you
5 wanted to comment on the post-marketing surveillance
6 and if there needs to be any enhancement of that
7 monitoring or how you make the assessment of that
8 relative to adding additional participants to a
9 randomized controlled study. Thank you.

10 **DR. ARNOLD MONTO:** Yes, and Dr. Anderson, we
11 do have a third discussion topic on enhancing
12 surveillance post-marketing, and that really does
13 become an issue here.

14 **DR. STEVEN ANDERSON:** Yeah, so I agree. So I
15 think your point is well taken, Dr. Dodd, about the
16 difference between 1,000 and 1,500. And so I think, as
17 we mentioned in my session, I think we have coverage of
18 about 10 million children in our databases. And then
19 if you probably stratified by sort of those three age
20 groups, in the question, then, you're getting down to a
21 couple million for each of these groups.

1 So febrile seizures, for instance, we did
2 studies in the Sentinel System, and I think there were
3 2 million children involved in each of those studies.
4 We did two of those studies, and so that's generally
5 the power we have for these age groups. And so I think
6 for the rare types of events, we would have coverage in
7 the post-market systems. But, again, it's post-market
8 versus pre-market or pre-licensure or pre-authorization
9 is what we're talking about. That, hopefully, gives
10 you an idea about numbers for post-market surveillance.

11 **DR. ARNOLD MONTO:** Thank you. Dr. Sawyer.

12 **DR. MARK SAWYER:** Well, to add to the
13 discussion about staging the age groups, I agree with
14 others that the 6- to 12-year-old is the most
15 important. The social, educational, and mental health
16 impacts have been dramatic in that age group. And we
17 haven't talked much about that, but I think the long-
18 term implications of that are likely to be profound.
19 It's another reason I think we need the vaccine sooner
20 rather than later.

21 But I do want to also emphasize the two- to

1 six-year-old group as important. This is a key age for
2 social development in children. And if they need to be
3 socially distanced or kept at home because they can't
4 yet be vaccinated, I think we're contributing to that
5 problem. I have a two and a half-year-old grandson,
6 and when I take him to the park, he looks at the
7 socially distanced and masked other children like
8 they're from outer space. And he doesn't play on the
9 play equipment. He's too busy trying to figure out
10 what those other beings are in the park. So I think
11 that age group needs to be prioritized as well.

12 **DR. ARNOLD MONTA:** Thank you. Dr. Perlman.

13 **DR. STANLEY PERLMAN:** Yes, so I just want to
14 add that I agree with the last statements that have
15 been made. I think that we need to be prepared to have
16 EUAs ready to go if we start seeing a big upsurge in
17 number of cases in the fall.

18 With the number of variants that we're seeing
19 -- I know we're not supposed to discuss this -- but the
20 number of variants we're seeing, the kind of immune
21 responses we measure in people who are older and also

1 in people immunocompromised, I think we just have to be
2 in a good position to protect the general population in
3 addition to children.

4 I know one of the comments that I was going
5 ask earlier was in the EUA one of the public speakers
6 mentioned that we only could consider effects on the
7 individuals themselves and not on society. Is that
8 correct? Because it seems to me that this is -- for
9 children this is such a broader issue, and it's so much
10 more important than just on the individual.

11 **DR. ARNOLD MONTA:** Dr. Meissner, your hand is
12 raised.

13 **DR. CODY MEISSNER:** Thank you, Arnold. And
14 I'd like to make a few comments in response to what
15 we've been discussing, and it's fascinating. First of
16 all, I don't think anyone disputes, again, that we need
17 a vaccine for children. That's really not the issue
18 we're discussing. The issue it seems to me is at what
19 stage are we going to say we know enough to justify
20 widespread use of a vaccine in adolescents and
21 children?

1 Now, the fact that the rates of disease are
2 falling are almost very likely related to a combination
3 of the vaccine and natural immunity. As has been
4 stated, about 55 percent of the population has been
5 fully vaccinated. And there's another 20 percent or
6 maybe more who have been infected. So we're getting up
7 around 70 or 75 percent immunity.

8 So this fall, could it come back? Sure, it
9 could come back. But the likelihood, I think, is
10 pretty low. And there certainly are studies that say
11 children were safer in school this year rather than the
12 children who were kept out of school, kept at home.
13 And a lot of that experience came from private schools,
14 resulting in inequity among the opportunities for our
15 children.

16 So I think we want to be very careful about
17 the argument that we want to vaccinate children, again,
18 to protect adults. Yes, we need herd immunity, but
19 we're probably going to get there. That's what the
20 experience was, I believe, in Israel that as more and
21 more adults were immunized, there was less and less

1 disease in children. So the first mandate is to do no
2 harm. And we don't know if we're doing no harm.

3 Now, in terms of the number of subjects to be
4 enrolled, that's a very difficult question because
5 10,000, sure, it's better than 5,000 which is better
6 than 3,000. But we're probably talking about adverse
7 events that are very infrequent. And in Israel, I
8 think myocarditis was suggested at 1 per 6,000. Well,
9 we're not going to pick that up even with 10,000
10 subjects enrolled. I think this becomes a very, very
11 complicated question.

12 But I think -- and hopefully we'll get more
13 information, as was suggested, from our experience with
14 the 12- to 15-year-old age group. Because if -- we'll
15 see what happens with myocarditis there. And we can
16 then make maybe a better recommendation about looking
17 at younger children. But, again, I think even though
18 it's not a statistical signal about myocarditis, the
19 fact that it's so specific a few days after the second
20 vaccine and it's in certain age group and gender, it's
21 hard to say that that's (audio skip) over (audio skip).

1 **DR. ARNOLD MONTO:** Dr. Gruber. Dr. Gruber.
2 I'm having some difficulties here.

3 **DR. MARION GRUBER:** I didn't mean to say
4 anything.

5 **DR. ARNOLD MONTO:** Oh, okay. Your hand was
6 raised in my -- okay, Dr. Gans.

7 **DR. HAYLEY GANS:** Thank you, for calling on
8 me. I really appreciate it. I wanted to add a few
9 points. I wanted to add in on the side that I think
10 it's really important that we have these immunizations
11 available for children, so I'll just add that to the
12 group that also felt that way. And I think we're all
13 using the same data to get to that point.

14 I think what we're missing here is some of the
15 facts that any time we're going to consider any of the
16 age groups -- so I do think there's probably not going
17 to be too much of a difference between the next age
18 group that's being considered, the 6- to 12-year-olds
19 and the group that is already being immunized. And
20 we'll have a lot of data to understand the risks of the
21 adverse reactions. But we're not actually looking at

1 that.

2 So I think if we're going to consider these
3 coming forward for anything, whether it's EUA and
4 licensure -- and I do think that the length of follow
5 up is not what's so important. Again, we're not going
6 to see -- we're not seeing more adverse events later
7 on. We're seeing them within this early time period.
8 So I think that can be caught.

9 What we need to do is increase the number of
10 our pediatric population within these so whatever 12-
11 to 15-year-olds that we can capture. We're not
12 capturing everyone and so expanding that. I know
13 that's question three, but this is going to be
14 important for this question as well as understanding
15 risk factors.

16 So we have real -- lots of capability to get
17 EHR data that we're not using. So I think that's
18 really important. And it should come, I think
19 personally, before a committee before this gets
20 expanded out so that people can consider the data at
21 hand at the time when these studies have been completed

1 and the request has gone into the FDA for any kind of
2 expansion of use.

3 I do think that the zero -- or I'm sorry --
4 the six-month to two-year is a very different question.
5 And the other thing that I haven't heard in the
6 conversations yet is we really need to do a better job
7 of understanding the dose escalation. We don't seem to
8 take any pause there. They've been moved fairly
9 quickly with the current doses, which is great.

10 But what we're seeing over and over is that
11 the immune response in younger people is higher. It's
12 not less inferior, of course. That's the only mark
13 that we have to move forward. But it's actually
14 higher, and that could be a marker of how we're looking
15 at adverse events because a lot of these seem immune
16 induced. And if children would do better with a lower
17 dose, I think that's really important.

18 The other thing that isn't part of this
19 conversation is we choose three weeks, four weeks,
20 whatever it is. The interval also might be important
21 for children. So I think we need to just take a pause

1 in the -- back up those preclinical studies in the
2 phase 1 and 2 and really understand what we're doing
3 before we move forward to phase 3. Then the numbers of
4 3,000 with a split in the vaccinated and unvaccinated
5 is probably going to be fine because we'll never
6 achieve higher numbers to get to an adverse event. And
7 we're going have to do that in our post-licensure.

8 So if our post-licensure, then, could actually
9 have increased enhancement for (A) the pediatric
10 adverse events that we're looking for and, (B) a better
11 population. Because it sounds like only 10 percent of
12 the pediatric population is in the current systems.

13 With that said, I also think that, typically,
14 we don't look mechanistically during these clinical
15 trials, but there's no reason we can't lean on our
16 studies to do some of that. There's no reason while
17 we're drawing blood that we can't look for the signal
18 that might be relevant to myocarditis.

19 So we know people are studying very clearly
20 myocarditis associated with COVID. So you can actually
21 look at those markers post-vaccine and try and come up

1 with some risk factors so that we can actually have a
2 better idea when we're immunizing, who would be at risk
3 for some of these adverse events and in addition that
4 will have the epidemiologic studies. So that's all.

5 **DR. ARNOLD MONTO:** All right, thank you.

6 Before we move on to the next discussion topic, I would
7 like to know -- we've heard comments about the need to
8 be able to roll out the vaccines if we start seeing
9 more disease. How important is it, Dr. Gruber, Dr.
10 Fink, for us to weigh in about emergency use versus
11 licensure? We really haven't talked much about that.
12 And then we're going on to the next discussion topic.

13 **DR. DORAN FINK:** I guess, Dr. Gruber and I
14 came on simultaneously. Maybe she can add to my
15 perspective. I guess it would be good to hear in more
16 explicit terms -- I think we've heard from some people
17 -- whether we should be contemplating Emergency Use
18 Authorization for use in these younger age groups. And
19 also, whether the duration of follow up that has
20 supported Emergency Use Authorization for adults and in
21 one instance, adolescents, would also be reasonable for

1 any of these younger age groups.

2 **DR. ARNOLD MONTO:** Well, we have a --
3 adolescents is our next question, our next discussion
4 topic.

5 **DR. DORAN FINK:** That's for licensure, though.

6 **DR. ARNOLD MONTO:** Oh, that's for licensure.
7 Yeah, but what you --

8 **DR. MARION GRUBER:** Yeah.

9 **DR. ARNOLD MONTO:** -- you mean -- so, for new
10 applications?

11 **DR. MARION GRUBER:** Well, I don't want to
12 really oppose what you just said. But to me, when I
13 hear that these vaccines need to be ready in case we
14 need it, then I think I'm hearing -- people who spoke
15 in that regard I think by implication would have to be
16 supportive of an EUA because a licensure just will take
17 a bit longer. And so I don't know if we need explicit
18 discussions on that at this point. If any of what I've
19 heard is that people were comfortable about the
20 duration of follow up that is being proposed here, and
21 (phonetic) saying that extending the duration of follow

1 up probably doesn't really add much in terms of
2 information to be gained, especially for rare adverse
3 events.

4 I also seem to hear that regardless of the
5 size of the database to support EUA or licensure, there
6 is not a differentiation there, that we need a robust
7 safety database in terms of the -- and regardless of
8 whether EUA or licensure. And if I'm wrong with my
9 understanding there, then I would like to be corrected,
10 but that's what I've heard.

11 **DR. ARNOLD MONTO:** That's what I've heard as
12 well. If there is anybody who disagrees with that
13 summary, could you raise your hands now -- I know there
14 are hands raised already -- because we really need to
15 move on to the next topic. Dr. Kurilla, is your hand
16 raised? I can't tell.

17 **DR. MICHAEL KURILLA:** Yes, it is, Arnold.

18 **DR. ARNOLD MONTO:** Okay.

19 **DR. MICHAEL KURILLA:** Yes, the comments I
20 wanted to make was that while I'm in agreement with
21 most of what has been discussed, I really don't see the

1 pursuit of EUA in this instance because of all of the
2 studies that will need to be done in terms of dose
3 ranging that will have to be performed. And so the
4 timeframe with which all of this is going to take place
5 doesn't seem to be aligned with both -- when we would
6 think we would need to use an EUA under certain
7 situations. I'm not really sure if we saw caseloads
8 going up if that would automatically imply that, oh, we
9 have to start vaccinating kids immediately.

10 And secondly, I don't really see this is an
11 emergency in children. Now, having some sort of
12 expanded access program or an EUA that's targeted
13 towards children at high risk, I could see subgroups of
14 children that really would need this vaccine. But I
15 think for the broader general population -- yes, it has
16 a public health impact -- but for the individual
17 getting the vaccine for children who don't really see a
18 lot of serious disease at all, very, very low risk, the
19 EUA just seems overkill in my opinion.

20 **DR. ARNOLD MONTO:** Okay. That was the only
21 comment from the group. Otherwise, I think we are more

1 or less in agreement with your summary. Let's go on,
2 then, to question -- or topic number two, which has to
3 do with the adolescents. "Provided there is sufficient
4 evidence of effectiveness to support benefit of COVID-
5 19 preventive vaccines for adolescents... discuss the
6 safety data, including database size and duration of
7 follow up, that would support licensure."

8 Note, only licensure, not Emergency Use
9 Authorization. And I would assume this is -- since
10 we've already got six months on the table, that this
11 would be accepting the six months or requesting for
12 longer or larger database size. So, Dr. Chatterjee.

13 **DR. ARCHANA CHATTERJEE:** Yes, thank you, Dr.
14 Monto. When I looked at this question, the thing that
15 came to my mind was actually to ask another question,
16 which was where are we at with the licensure for
17 adults? Because this is a question that I field all
18 the time from family, friends, neighbors, people who
19 write to me, members of the community. Because I think
20 we would be a lot further along in our consideration
21 and discussions around how many people we need in a

1 safety database for adolescents if we knew what the
2 numbers look like for adults. So that's one point I'd
3 like to make. And I don't know if anybody from the FDA
4 is prepared to answer that question.

5 But with regard to the size of the database
6 and the duration of follow up, the specific question
7 that's asked here, again, for licensure, obviously I
8 think that the safety database has to be robust. I'm
9 not certain of what the actual number needs to be. I'm
10 not sure how people are actually coming up with
11 numbers. I can't do that other than simply guessing.

12 And the duration of follow up, there I think
13 we do have an obligation to have it be at least six
14 months and perhaps up to a year in order to really have
15 robust data that we can rely on. I'll stop there.

16 **DR. ARNOLD MONTO:** Dr. Gans.

17 **DR. HAYLEY GANS:** Sorry, did you call on me?

18 **DR. ARNOLD MONTO:** Your hand was raised.

19 **DR. HAYLEY GANS:** Oh, yeah, thank you. I
20 didn't hear Gans. I heard Pans. Anyway, yeah, thank
21 you. I don't think that this age --

1 **DR. ARNOLD MONTO:** I do my best.

2 **DR. HAYLEY GANS:** I think that this age group
3 is probably the easiest age group. And I think we
4 probably have, after all the doses that have been
5 given, quite a bit of data now to start supporting the
6 safety.

7 The real question that is still in everyone's
8 mind is the myocarditis. So I think until that safety
9 datapoint or signal is actually worked out -- and we
10 heard a lot of questions regarding that without a lot
11 of answers today. So I think that rather than the
12 duration, I think because this is a unique situation
13 where we have a ton of already post-use information
14 that we don't usually have when vaccines come up for
15 licensure, that this is a unique opportunity to have
16 more data rather than time. I think time is not of the
17 essence. So I think in order to get to licensure we
18 need enhanced information on the current safety signals
19 that we're already seeing.

20 **DR. ARNOLD MONTO:** I don't see, miraculously,
21 any other hands raised. Anybody not comfortable with

1 the six-month time? Are we being asked whether it
2 should be any shorter than that? I don't believe
3 that's the case unless -- and somebody from FDA would
4 like to mention it? So we seem to be comfortable as a
5 group with the six-month follow up that was in the
6 original guidance document. That was easy.

7 Let's go on to discussion question number
8 three, which is pretty well open ended and I think may
9 be as important as some of our discussions in item one
10 and related to item number one. "Please discuss
11 studies following licensure and/or issuance of an EUA
12 to further evaluate safety and effectiveness of COVID-
13 19 vaccines in different pediatric age groups," pretty
14 much an open-ended question. And we can, I guess, talk
15 about not only statistics but pathogenesis of side
16 effects and things like that. So, Dr. Chatterjee.

17 **DR. ARCHANA CHATTERJEE:** Thanks, Dr. Monto.
18 With regard to this question, one of the points I
19 wanted to make earlier -- or I'd like to bring it up
20 now -- is with regard to racial and ethnic minorities
21 and making sure that a sufficient proportion of

1 children from these different groups are included in
2 addition to the different age groups.

3 Because it's certainly possible -- and we've
4 seen that with regard to the pandemic itself, with the
5 disease itself, that the disease seems to affect
6 different racial and ethnic minorities in different
7 ways. So to ensure that any post-licensure or post-EUA
8 studies that are done include a sufficient number of
9 children from minoritized background, I think that
10 would be an important aspect to keep in mind.

11 **DR. ARNOLD MONTO:** Thank you. Dr. Pergam.

12 **DR. STEVEN PERGAM:** Thanks, Arnold. Yeah, I
13 sort of echo Dr. Chatterjee's earlier comment about
14 licensure for the adult vaccine, which I'm still
15 unclear when we're going to be reviewing the BLAs for
16 those. I think what'll be really important in these
17 future studies is once we have additional data about
18 immunogenicity endpoints in the adult trials, which I
19 know are ongoing, we have to make sure that we're
20 looking at these more specifically in the pediatric
21 populations. Specifically, T cell immunity is going to

1 be important beyond just the antibody levels.

2 And I'm really curious, specifically, with the
3 different vaccines. I know you didn't want us to bring
4 up the different vaccines between Pfizer and Moderna.
5 But Pfizer and Moderna do have different dosage levels,
6 and they'd be really -- I'm curious about what Dr.
7 Kurilla had brought up is I'm looking at these
8 immunogenicity levels with the different dosing
9 strategies that they're going to be putting forward.
10 So I think that'll be a really important piece as we
11 look at efficacy within the trials and then, obviously,
12 that'll plan to safety as well.

13 **DR. ARNOLD MONTO:** Thank you. And Dr.
14 McInnis.

15 **DR. PAMELA McINNES:** Thank you, Arnold. So I
16 think there's the age-old issue of waning immunity and
17 being able to understand the kinetics of this response.
18 This is not unique to pediatric groups but will apply
19 to adults as well. So I think that's sort of a no
20 brainer of what has to be followed for ongoing
21 effectiveness of these vaccines. And, in fact, then

1 perhaps we will get better at understanding what might
2 actually be a marker of immunity, and we'll learn more
3 about what's happening with functional antibody. So I
4 think that's really important.

5 I think the safety piece is that I'm not
6 convinced that this has to be newly invented. We've
7 obviously got wonderful systems in place. And,
8 hopefully, participants in studies are going to be able
9 to be followed up long-term and that we will hopefully
10 be able to pick up medically attended illnesses and
11 hospitalizations, et cetera, and understand more about
12 that post-licensure. Thank you.

13 **DR. ARNOLD MONTO:** Thank you, Pamela. Dr.
14 Sawyer.

15 **DR. MARK SAWYER:** Hi, it (audio skip) without
16 saying, but given the unusual immunologic responses in
17 general that we're seeing in children, we need to be
18 vigilant for vaccine enhanced disease that like we see
19 in Dengue with vaccination in naïve people who
20 subsequently then get infected. So I want to keep that
21 on the radar along with the other previous comments

1 about expanding the breadth of immunologic phenomenon
2 that we look for after vaccine.

3 And then I think because we've all discussed
4 at fair length here how -- the concern about
5 myocarditis and other side effects which seem to
6 generally be worse after the second dose, I think we
7 need some studies on single dose and whether that might
8 be adequate going forward.

9 **DR. ARNOLD MONTO:** Dr. Kurilla.

10 **DR. MICHAEL KURILLA:** Thank you, Arnold.
11 Yeah, so I agree with a lot of the comments that have
12 been made, particularly about really doing some better
13 detailed understanding of the immunological response.

14 Early on in this outbreak there was a lot of
15 talk about a little bit of cross reactivity that some
16 people experienced with prior coronavirus infection.
17 That may be -- that may end up be -- influencing some
18 of the vaccine response and also some of the adverse
19 events that we're seeing in children. Or the younger
20 the children are, the more unique they are going to be
21 in terms of being more coronavirus naïve to begin with.

1 So that may actually have an impact on their long-term
2 response to coronaviruses in general.

3 I think the myocarditis is something that
4 needs to be looked at closely because we're likely
5 seeing the tip of the iceberg, and there may be
6 subclinical aspects to that. And that may be more
7 important developmentally in terms of children that may
8 have some long-term impacts, much more subtle, but may
9 lead to long-term events while they're adults.

10 So I think those two things that we have to
11 pay a little more attention to and be prepared to
12 follow up because we're likely to find some surprises
13 going forward. Thank you.

14 **DR. ARNOLD MONTO:** Thank you. Dr. Gans.

15 **DR. HAYLEY GANS:** (Audio skip) -- points that
16 have been raised which I think are great. Along the
17 lines of what Dr. Sawyer was saying in terms of the
18 enhanced disease that may be seen and it may have a
19 preference for people who are more immune response, so
20 kids, I do think we need to continue to look at
21 breakthrough disease.

1 So while it may that the hospitalization rates
2 and other rates are down, I do think we still need to
3 understand the epidemiology of how people get sick,
4 especially when we come maybe potentially into a second
5 season and what is going to be circulating. We don't
6 know. So I think that's going to be an important
7 follow up study that needs to be added to the ones that
8 have already been stated and has been stated by Dr.
9 Chatterjee.

10 I think we do need to look because these will
11 be given particularly to young children with their
12 other vaccines. So we have to look at if there's any
13 interference, not necessarily with safety as was
14 already raised for the fever, but also the immune
15 response. And then I can't iterate enough, because
16 I've said it several times, the immune response really
17 needs to be well adjusted.

18 And then I do think that the way that we use
19 vaccines in children is usually a prime boost type of
20 strategy. So I do think that including (phonetic) a
21 second dose is going to be necessary. So even though

1 the recommendation was to look at single dose and
2 that's fine, I do think we also need to do studies,
3 again as I said, with different intervals because I do
4 think that initial immune response is likely to need a
5 prime boost feature to it. And we just need to get it
6 right on dose and timing.

7 **DR. ARNOLD MONTO:** Dr. Meissner.

8 **DR. CODY MEISSNER:** Thank you, Arnold. And I
9 think that -- I agree with what Ofer Levy said early on
10 and I think what everyone else is saying. If we had
11 more information about what's going on with
12 myocarditis, it would be much easier to address some of
13 these safety questions for younger children because
14 we're really operating somewhat in the blind here. And
15 so I agree with what I think several people are saying
16 because there are a number of options.

17 We could have a longer interval for the first
18 dose and the second dose. We could reduce the amount
19 of mRNA in the vaccines. Or, as has been suggested
20 initially, we may not even need to give a second dose
21 to children because this is a pretty -- it stimulates a

1 pretty aggressive response. But I think these are all
2 issues that need to be addressed, hopefully, before
3 it's necessary to use these vaccines in high numbers in
4 young children.

5 And we haven't thought about the other
6 possibility. Maybe the numbers, the amount of disease
7 are going to continue to decline. What happens if the
8 slope of the number of new cases goes down? It seems
9 to me that's more likely than it will go up. And so
10 these are going to be even more difficult questions to
11 answer in terms of balancing risk and benefit. Over.

12 **DR. ARNOLD MONTO:** Thank you. Dr. Nelson.

13 **DR. MICHAEL NELSON:** Thank you. I just wanted
14 to comment on the changes in the schedule and,
15 obviously, with the dose and to be very careful that we
16 would not do this passively post-licensure, in fact,
17 that they should be controlled studies if pursued.
18 Since we're using immunobridging technique, I would
19 think the same prime boost schedule would need to be
20 followed in order to provide the reassurance of safety
21 beyond expanding the use afterwards.

1 I also do want to focus a little bit on dose
2 and think about, again, how important it is to
3 discriminate what the right dose is for the right child
4 and also look at the immune response of children. It
5 may not be exactly the same qualitatively with respect
6 to the antibodies that are generated. So if we're
7 hanging our hat on neutralizing antibodies, we need to
8 characterize that immune response in various age groups
9 as well as the neutralizing effect against the multiple
10 variants that are emerging.

11 And I want to go back briefly to MIS-C as
12 well. I noted in the two trials in [ClinicalTrials.gov](https://clinicaltrials.gov)
13 that one of the two vaccines excluded it from
14 enrollment, one didn't. I do think we need to track
15 this population specifically in their response to any
16 doses of the vaccines as we follow them. And we need
17 more information as well on the immunosuppressed and
18 clearly, our ethnicity, diversity with respect to
19 immune response and safety. Thank you.

20 **DR. ARNOLD MONTO:** Thank you. And finally,
21 Dr. Chatterjee who is going to have the last word.

1 **DR. ARCHANA CHATTERJEE:** Thank you, Dr. Monto.
2 I know we had decided we are not going to talk about
3 variants, but I think this question actually deserves
4 just a brief mention that if we talk about
5 effectiveness post-licensure or authorization, as the
6 variants continue to evolve and appear in our
7 population, I think this would be a critical piece as
8 well to look at to see if the current vaccines are
9 actually serving us or if these variants are escaping
10 our current vaccines.

11 **DR. ARNOLD MONTO:** Thank you. I think we are
12 all aware that that's a key issue, looking. And many
13 individuals and groups are now looking at escape
14 related to variants.

15 When we went into this discussion topic, the
16 series of discussion topics, I said that it would be
17 very difficult to summarize. And I do think it is
18 surprisingly easier to summarize for number two,
19 discussion topic two, where I think there was a
20 reasonable support for about the same kind of duration
21 to full licensure was in the original documents for the

1 adult vaccines. Clearly, we had a difference -- a
2 great deal of emphasis on post-licensure evaluation to
3 go along with some of the issues related to question
4 one.

5 I think we heard more agreement with the
6 proposed numbers and duration that was in the briefing
7 document than disagreement. We had only a few people
8 who really disagreed with some of the approaches. We
9 heard that the numbers will certainly have to be larger
10 for the youngest age groups.

11 We really did not have any kind of unanimity
12 about emergency use versus licensure. We heard some
13 who wanted to have the vaccine available if you needed
14 it but others who felt that we ought to go to full --
15 not have an Emergency Use Authorization, particularly
16 in younger individuals. So it's very difficult to
17 summarize about our views, our opinions in that regard.
18 But to my surprise, and happy surprise, I think we
19 heard much more agreement than disagreement about all
20 of the points related to discussion topic one.

21 So thank you, and I'd like to hand over to Dr.

1 Marks who I believe has some concluding comments.

2 **DR. PETER MARKS:** So Dr. Monto and Committee
3 members, I just want to take a moment to thank everyone
4 for their participation today. I think it's very
5 important to have the type of dialogue that took place.
6 I think this is clearly an area where achieving
7 consensus, as people can see, may be a little bit
8 challenging. But it's very important that we have the
9 dialog, and I'm very, very grateful for everyone's time
10 today.

11 I, first of all, want to thank the Advisory
12 Committee staff that has done an incredibly great job
13 putting this together at FDA. I want to thank our
14 Office of Vaccines, Office of Biostatistics and
15 Epidemiology who put things together. I also want to
16 thank all of you on the Committee for a very frank
17 discussion. I think all of your perspectives are very
18 important as we put things together.

19 I also want to take a moment to remember all
20 the children who have died of COVID-19 in this pandemic
21 because that should not be forgotten here. I just need

1 to reiterate something that this is an illness that
2 takes the lives of children. We know that over 300
3 children have died in the pandemic so far and that if
4 one looked at the death rate of the 11- to 17-year-olds
5 who had COVID-19, it was about 1 in 3,600 of those
6 individuals. And since we had over 1 million cases in
7 that age range, you can see that there are deaths due
8 to this. So I want to remember those.

9 And as we go forward, I think all of us have
10 as a goal to eliminate any vaccine preventable deaths
11 that we can with a reasonable benefit-risk. So as we
12 leave today, I really want to thank you for all of the
13 thoughts about this because I think everyone is
14 obviously trying to do their best to achieve that goal.
15 And I appreciate all the different viewpoints.

16 Thanks also to everyone who tuned in today to
17 listen to this webcast. And I'll turn it back over to
18 Dr. Monto or Dr. Atreya.

19 **DR. ARNOLD MONTO:** I think we turn it over to
20 Dr. Atreya now to formally close the meeting.

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MEETING ADJOURNED

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DR. PRABHAKARA ATREYA: Okay. Great. Thank you, all. Thank you, Dr. Arnold Monto, and the entire VRBPAC team and then all the staff who participated. These are great discussions and then a great meeting all around. Thank you and I formally close the meeting now. So the meeting will adjourn now. Okay. Thank you and have a good evening. Bye-bye.

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[MEETING ADJOURNED]