
Stimulant Use Disorders: Developing Drugs for Treatment Guidance for Industry

DRAFT GUIDANCE

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

**May 2026
Clinical/Medical
Revision 1**

Stimulant Use Disorders: Developing Drugs for Treatment Guidance for Industry

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Contains Nonbinding Recommendations

Draft — Not for Implementation

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1 **Stimulant Use Disorders: Developing Drugs for Treatment**
2 **Guidance for Industry¹**
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7 This draft guidance, when finalized, will represent the current thinking of the Food and Drug
8 Administration (FDA or Agency) on this topic. It does not establish any rights for any person and is not
9 binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the
10 applicable statutes and regulations. To discuss an alternative approach, contact the FDA staff responsible
11 for this guidance as listed on the title page.
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16 **I. INTRODUCTION**
17

18 The purpose of this guidance is to assist sponsors in the clinical development of drugs for the
19 treatment of stimulant use disorders.² Specifically, this guidance addresses the Food and Drug
20 Administration’s (FDA’s or Agency’s) current recommendations regarding the overall
21 development program and clinical trial designs for the development of drugs to support
22 indications for treatment of moderate to severe cocaine use disorder, treatment of moderate to
23 severe methamphetamine use disorder, or treatment of moderate to severe prescription stimulant
24 use disorder.³ This draft guidance is intended to serve as a focus for continued discussions
25 among Center for Drug Evaluation and Research staff (particularly the Division of
26 Anesthesiology, Addiction Medicine, and Pain Medicine, or the division), pharmaceutical
27 sponsors, the academic community, and the public.⁴ This guidance does not address treatment of
28 intoxication or poisoning with various stimulants or treatment of withdrawal from stimulants.
29

¹ This guidance has been prepared by the Division of Anesthesiology, Addiction Medicine, and Pain Medicine in the Center for Drug Evaluation and Research at the Food and Drug Administration. You may submit comments on this guidance at any time. Submit comments to Docket No. FDA-2023-D-1848 (available at <https://www.regulations.gov/docket?D=FDA-2023-D-1848>). See the instructions in that docket for submitting comments on this and other Level 2 guidances.

² For the purposes of this guidance, all references to *drugs* include both human drugs and biological products unless otherwise specified.

³ FDA understands that sponsors may also wish to consider the development of drugs to support indications for treatment of mild stimulant use disorders, though given past experience, it may be particularly challenging to demonstrate treatment is effective in individuals with mild stimulant use disorders. There may also be practical and ethical concerns about identifying, recruiting, and enrolling subjects with mild stimulant use disorders if the benefit-risk balance of the specific drug being studied is not appropriate for an individual with a mild stimulant use disorder. However, we encourage sponsors to contact FDA if this is of interest.

⁴ In addition to consulting guidances, sponsors are encouraged to contact the division to discuss specific issues that arise during the development of these drugs.

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30 Because FDA has yet to approve any medication treatments for stimulant use disorder, this
31 guidance reflects current recommendations based on a number of uncertainties about the best
32 approaches for treating stimulant use disorder and the best approaches for evaluating responses
33 to treatment. This guidance also incorporates lessons learned about approaches for evaluating
34 responses to treatment that are unlikely to be successful. FDA is engaged in an ongoing process
35 to learn more about stimulant use disorders and their treatments to provide the best possible
36 advice to sponsors.⁵ As the evidence supporting the development of drugs for stimulant use
37 disorder treatment evolves, the recommendations in this guidance and any recommendations
38 given to sponsors at milestone meetings may change.

39
40 In general, FDA’s guidance documents do not establish legally enforceable responsibilities.
41 Instead, guidances describe the Agency’s current thinking on a topic and should be viewed only
42 as recommendations, unless specific regulatory or statutory requirements are cited. The use of
43 the word *should* in Agency guidances means that something is suggested or recommended, but
44 not required.

45 46 47 **II. BACKGROUND: HETEROGENEITY OF STIMULANT USE DISORDERS AND** 48 **POPULATIONS**

49
50 The *Diagnostic and Statistical Manual of Mental Disorders, 5th edition*, (DSM-5) has a single
51 diagnosis, *stimulant use disorder*, defined as “a pattern of amphetamine-type substance, cocaine,
52 or other stimulant use leading to clinically significant impairment or distress,” ranging from mild
53 to severe.⁶ The definition lists various symptoms of impairment or distress, but notably, it does
54 not include any criteria related to amount or frequency of stimulant use.⁷

55
56 The group of individuals meeting DSM-5 criteria for stimulant use disorder is very
57 heterogeneous, with individuals using different stimulants in a range of different settings and for
58 different reasons. This heterogeneity may contribute to the difficulty in identifying medications
59 that are efficacious for the entire subset of patients diagnosed with cocaine use disorder or
60 methamphetamine use disorder, and even more for all patients meeting the broader criteria for
61 stimulant use disorder. Cocaine, methamphetamine, and other stimulants have different
62 mechanisms and effects, and this may lead to differences in clinical presentation and responses
63 to treatment.

64

⁵ A public workshop hosted by the Reagan-Udall Foundation for the FDA in October 2021 brought together experts from the patient community, academia, clinical care, FDA, the National Institute on Drug Abuse, pharmaceutical companies, and health insurance payers. Those experts emphasized the need for continued investment in clinical research and for consensus around clinically meaningful and patient-centric endpoints for assessing treatments for stimulant use disorder. The report can be found on the foundation’s website at <https://reaganudall.org/programs/substance-use-disorders>.

⁶ American Psychiatric Association, 2013, *Diagnostic and Statistical Manual of Mental Disorders, 5th edition*, Arlington, VA: American Psychiatric Association, 561.

⁷ The DSM-5 stimulant use disorder diagnostic criteria are available on pages 561 to 562 of the manual, which is available at <https://dsm.psychiatryonline.org/doi/epdf/10.1176/appi.books.9780890425596>.

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III. DEVELOPMENT PROGRAM

This section includes general considerations for development programs evaluating potential drug treatments for stimulant use disorder. FDA is open to discussing various approaches to address these considerations; sponsors should engage the division early in the drug development process.

A. Early Phase Development Considerations

To characterize the safety profile of the drug, sponsors should conduct first-in-human studies in healthy volunteers. In addition to general phase 1 safety and pharmacokinetic studies, sponsors should address the potential for interactions between the investigational drug and the relevant stimulant in subjects who are experienced in taking stimulants. Because stimulants have the potential for single-dose lethality, sponsors should establish that the investigational drug does not potentiate the toxicity of the stimulant (e.g., with adverse effects such as tachycardia, hypertension, and central nervous system (CNS) activation). It should be expected that the subject with stimulant use disorder may be exposed to both the investigational drug and the stimulant concurrently. For this reason, sponsors should ensure that there is no clinically relevant drug-stimulant interaction (either pharmacokinetic or enhancement of the pharmacodynamic or adverse effects of the stimulant leading to exaggerated adverse effects) early in drug development.

- If there is a predicted interaction that may lead to an adverse event based upon the investigational drug and the stimulant’s mechanism of action, or if there are observations in nonclinical studies or phase 1 studies of the investigational drug alone (e.g., adrenergic-type observations, CNS activation, or lowered seizure threshold in animal toxicology studies) that suggest the potential for an interaction with the stimulant, animal toxicology interaction studies should precede clinical phase 1 interaction trials. These toxicology studies should address risks such as acute cardiovascular effects, lowering of seizure threshold, or other specific predicted effects.⁸
- If sponsors observe serious interactions leading to toxicity in nonclinical studies, or if sponsors observe potentially important adverse events likely resulting from an interaction in phase 1 trials, sponsors should consider discontinuing development or suspending development and assessing the benefit-risk of continued development. Depending on the pharmacology of the investigational drug, sponsors should design animal toxicology studies and (if appropriate) phase 1 clinical trials in stimulant-experienced subjects to carefully assess any potential drug effect that may enhance the stimulant’s adverse effects (e.g., CNS activity, adrenergic activity including assessment of cardiovascular effects, seizure threshold).

⁸ We support the principles of the “3Rs,” to reduce, refine, and replace animal use in testing when feasible. We encourage sponsors to consult with us if they wish to use a nonanimal testing method they believe is suitable, adequate, validated, and feasible. We will consider if such an alternative method could be assessed for equivalency to an animal test method.

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106 After completing investigational drug-stimulant interaction nonclinical studies, as appropriate,
107 sponsors should conduct initial investigational drug-stimulant interaction human trials in subjects
108 who are experienced with the stimulant through the route of administration of interest, who are
109 not seeking treatment for their stimulant use disorders, and who are otherwise medically healthy.
110 These trials should be conducted in carefully monitored situations where stimulant-associated
111 adverse events can be managed. Sponsors should evaluate the effects of the investigational drug
112 on the pharmacokinetics and pharmacodynamics (e.g., physiological effects) of the stimulant(s)
113 of interest. These initial investigational drug-stimulant interaction human trials may also be able
114 to provide some preliminary data on the ability of the investigational drug to modify subjective
115 responses to the stimulant of interest. Additionally, FDA anticipates that the trials can provide
116 information on how the investigational drug affects the detection of the stimulant in biological
117 fluids. This is important in interpreting the results of toxicology tests that are used to detect
118 illicit stimulant use in efficacy trials.

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B. Efficacy Trial Considerations

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1. Population

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To improve the chances of success, we recommend that sponsors of drug development programs evaluating potential treatments for stimulant use disorder give careful attention to the populations they select for study. Thus, when evaluating the efficacy of a drug for the treatment of stimulant use disorder, the sponsor should consider studying people who use cocaine, methamphetamine, and prescription stimulants separately. Initial clinical trial evidence that therapeutic response is similar across different stimulants could provide useful information for later clinical trials with broader populations.

Some additional considerations for sponsors of drugs for the treatment of stimulant use disorders could include route of administration (oral, smoked, intravenous, or intranasal) and/or motivation for use of a specific stimulant (e.g., work performance enhancement, club drug use, escape, sensation seeking, sexual performance enhancement). Some subpopulations may be particularly responsive, or nonresponsive, to specific types of treatment. Another factor sponsors may want to consider is mechanism of action: Some drugs proposed to treat stimulant use disorder might be more suitable for helping subjects actively using stimulants, while other drugs might be more suitable for preventing relapse in subjects who are abstinent at baseline.

To increase the chance of matching the investigational drug to the population likely to benefit, we recommend that sponsors incorporate early-stage clinical trials that evaluate response in different stimulant use disorder populations. Based upon the results of the earlier trials, sponsors may determine whether it is appropriate to conduct later trials in broader populations or in narrower, more targeted ones. Note that sponsors should not need to study their drugs in all conceivable populations before submitting marketing applications. Sponsors are encouraged to contact the division to discuss the development of trials to ensure sufficient statistical power and sample size to adequately capture a representative segment of subjects with stimulant use disorder, while balancing the potential for success in matching the investigational drug to the population likely to benefit.

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152 Finally, sponsors should enroll subjects whose primary problem is their stimulant use disorder.
153 Some individuals who use stimulants report using them to manage other problems, not because
154 of a particular urge or desire to use stimulants. For example, some patients with opioid use
155 disorder report using methamphetamines to manage the effects of opioids (either to treat
156 withdrawal or to prevent overdose). These individuals may meet diagnostic criteria for a
157 stimulant use disorder but would be unlikely to respond to a drug that addressed only that
158 problem, and thus FDA does not recommend that such subjects be included in trials of drug
159 treatments for stimulant use disorder.

161 2. *Design and Duration*

163 Sponsors should conduct randomized, double-blind, and placebo-controlled efficacy trials. FDA
164 strongly recommends sponsors provide behavioral treatment to all trial subjects and that the
165 behavioral treatment be standardized and described in the protocol.

166
167 Trials should also be of sufficient duration to achieve a meaningful change in stimulant use
168 behavior and/or stimulant use disorder symptoms and to demonstrate that this effect is durable.
169 Improvement may not occur immediately, given the nature of stimulant use disorder, and for this
170 reason sponsors could consider a scientifically justifiable portion of the trial duration a grace
171 period for analytic purposes.⁹ Because of the time period required to demonstrate a response to
172 treatment, FDA typically recommends demonstrating improvement in the trial primary endpoint
173 for 3 months or longer, which may involve a controlled period of 6 months of observation. FDA
174 encourages sponsors to discuss any questions about trial duration, such as the characteristics of
175 the specific study sample and the anticipated effect of the intervention, with the division.

177 3. *Measurements of Drug Use*

178
179 To bolster confidence in trial results, FDA suggests that sponsors propose and explain the
180 rationale for a combination of self-report and biological testing. FDA's recommended
181 considerations for each are as follows:

- 183 • **Self-report:** For any endpoint involving a pattern of stimulant use, a certain amount of
184 reliance on self-report will likely be necessary. Sponsors can propose daily reports, staff-
185 assisted *timeline followback* reconstruction at visits,¹⁰ or other self-report tools. Because
186 self-report can be subject to issues related to recall, response bias, social desirability, and
187 other factors, self-report of drug use may not provide persuasive data by itself.
- 188 • **Biological testing:** FDA recognizes that biological testing is often an important
189 component of monitoring response to treatment. However, FDA does not currently have
190

⁹ Kiluk BD, Carroll KM, Duhig A, Falk DE, Kampman K, Lai S, Litten RZ, McCann DJ, Montoya ID, Preston KL, Skolnick P, Weisner C, Woody G, Chandler R, Detke MJ, Dunn K, Dworkin RH, Fertig J, Gewandter J, Moeller FG, and Strain EC, 2016, Measures of Outcome for Stimulant Trials: ACTION Recommendations and Research Agenda, *Drug Alcohol Depend*, 158:1–7.

¹⁰ *Timeline followback* is described on the National Institute on Drug Abuse Clinical Trials Network's Common Data Elements website at <https://cde.drugabuse.gov/instrument/d89c8e23-16e5-625a-e040-bb89ad43465d>.

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191 evidence to support a recommendation on the optimal frequency of biological testing,
192 including urine toxicology. Sponsors should consider expected effects and any impact of
193 the investigational drug on the biological detection window, striking a balance between
194 minimizing subject burden and providing some degree of biological confirmation of self-
195 report.¹¹

196
197 During nonclinical development or phase 1 trials, sponsors should determine any potential for
198 the investigational drug to alter detection of the stimulant. This could occur for various reasons,
199 including interference with the assay for the stimulant or because of a drug-stimulant interaction
200 with alteration in metabolism or clearance of the stimulant. Sponsors should be aware that
201 outcome measures based on detecting changes in day-to-day use, rather than more sustained
202 periods of nonuse, must be carefully interpreted based upon a knowledge of the
203 pharmacokinetics (detection in urine or other matrices) of the stimulant and any interactions
204 between the investigational drug and the stimulant that alter urinary excretion of the stimulant or
205 metabolites. Note that some treatment approaches for stimulant use disorder (e.g.,
206 immunotherapy such as a monoclonal antibody directed at the drug, a vaccine leading to
207 antibody developed to the drug) may both markedly reduce free drug, increase bound drug, and
208 prolong detectable urinary excretion. Trial designs, including the use of urine or biochemical
209 testing in studies of such approaches, should be informed by such interactions.

210 211 4. *Measurements of Drug Use to Assess Treatment Response*

212
213 Historically, clinical trials of treatments for stimulant use disorder have focused on the results of
214 urine toxicology testing as a way to assess response to treatment; and as noted above, FDA
215 recognizes the importance of urine toxicology testing for this purpose. Urine toxicology results
216 (e.g., in reflecting pattern of stimulant use) are a surrogate measure because they are not a
217 reflection of how the subject feels, functions, or survives.¹² We have previously advised that a
218 sustained period of negative urine toxicology findings, indicating abstinence, could be a valid
219 surrogate for clinical benefit. However, FDA does not, and has not, advised that the only
220 appropriate endpoint based on urine toxicology results is the number of subjects achieving
221 complete abstinence.

222
223 FDA is open to other endpoints that reflect meaningful improvement in stimulant use disorder,
224 noting that measuring other changes in pattern of stimulant use and establishing their clinical
225 benefit may be more complex. For example, capturing periods of nonuse, such as number of

¹¹ Many previous trials of drugs to treat cocaine use disorder incorporated thrice-weekly toxicology testing based on prior trials in other addictive disorders. Quantitative assays were developed for the major metabolite of cocaine (benzoylecgonine) and an algorithm for distinguishing new use from previous use, minimizing false-positive urine tests caused by carryover when sampling thrice weekly. Less is known about the detection of methamphetamines or other stimulants in urine and other body fluids. However, prior research has suggested that thrice-weekly visits may be burdensome to subjects and, thus, contribute to missing data and trial drop out.

¹² See the draft guidance for industry *Demonstrating Substantial Evidence of Effectiveness for Human Drug and Biological Products* (December 2019). When final, this guidance will represent the FDA's current thinking on this topic. For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>.

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226 days of nonuse per period (e.g., per week, per month), may be more practical. Conversely, there
227 is consensus that certain changes in pattern of stimulant use, such as *fewer uses per day* or
228 *reduced amount of drug used per occasion of use*, are impractical to measure.¹³ They are also of
229 uncertain significance when the stimulant used is illicit, and therefore of unknown and inherently
230 variable potency. Thus, some changes in pattern of stimulant use are likely unsuitable as clinical
231 trial endpoints. FDA encourages sponsors to discuss responder definition with the division.

232
233 Likewise, change from baseline analyses based on pattern of use is very challenging. It is not
234 possible to get a *right now* baseline measurement of a pattern of stimulant use, the way one can
235 for blood pressure or pain score, or a snapshot that captures the overall level of use over a period
236 of time (analogous to hemoglobin A1c). However, the entry criteria may specify severity of use
237 (e.g., moderate to severe cocaine use disorder), so use over time in the trial may be more useful
238 than comparison to baseline, given the challenges of adequately evaluating the baseline.

C. Endpoints

241
242 The subsections below lay out considerations for change in pattern of stimulant use, change in
243 disease status using diagnostic criteria, and other potential outcome assessments. Sponsors may
244 consider demonstrating an effect in one or more of these options.

1. Change in Pattern of Stimulant Use

245
246
247
248 The term *pattern of stimulant use* refers to the frequency (days of use per week or month),
249 timing, and intensity (uses per day or amount per use) of stimulant use by an individual subject.
250 As discussed above, from a practical standpoint, intensity parameters are difficult to reliably
251 measure, and frequency measures are more feasible to measure.

252
253
254 FDA prefers the phrase *change in pattern of stimulant use* (as opposed to the more ambiguous
255 phrase *reduction in stimulant use*) and recommends its use to emphasize that within-subject
256 responses are of interest. In practice, the proportion of subjects achieving a target pattern of use
257 days per period of time could be an acceptable endpoint, with a prespecified target pattern of use
258 that defines a relevant within-subject response. In contrast, evaluation of the difference between
259 treatment groups in the mean number of days free of use is not recommended.

260
261 Sponsors should prespecify in the protocol a target pattern that reflects a satisfactory response to
262 treatment for individual subjects, to be used to define a responder for the purposes of analysis. A
263 trial to evaluate a treatment aimed at modifying the number of days per period of time should
264 include a minimum frequency of use as an entry criterion, such that the target pattern represents
265 improvement. Note that some individuals have a baseline pattern of infrequent binge use of a
266 stimulant (e.g., cocaine use every several weeks); a study of such subjects would need to define a
267 target pattern that reflects meaningful change for that pattern.

268
269 Although stimulant use patterns are not direct measures of how subjects feel or function, such
270 assessments may be considered as candidate surrogate endpoints. Given the unmet medical need

¹³ See footnote 9.

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271 for stimulant use disorder medication treatments, a candidate surrogate or intermediate clinical
272 endpoint may be appropriate based on the scientific support for that endpoint. Sponsors should
273 explain their choice of a responder definition, ideally using data supporting the relationship of
274 the target pattern to clinical benefit. This recommendation may not apply to sponsors proposing
275 a prolonged period of nonuse as a target pattern because the benefit of this pattern can be
276 assumed. It may be appropriate for the responder definition to incorporate allowances for a
277 certain number of missing visits. It may also be appropriate to focus on the last several months
278 of the treatment period, recognizing that treatment response may not occur right away.

279
280 To aid in interpretation of results, sponsors should provide a graph that shows the proportions of
281 responders by treatment arm over the entire range of possible response definitions. Sponsors
282 should also display results over time by presenting a summary measure (e.g., proportion of
283 subjects by treatment group that meets response criteria) over the duration of the trial and by
284 using methods that permit visualization of the progress of individual subjects over time.

285
286 Sponsors should consider the following caveat to using pattern of stimulant use as an outcome
287 measure. Some types of treatment might prolong or potentiate stimulant effects such that
288 subjects reduce use of the stimulant without reducing the subjective and rewarding effects, or
289 reducing health harms of the stimulant use. In this scenario, reliance on pattern of stimulant use
290 as an assessment of response to treatment may lack validity, and direct measures of clinical
291 benefit would be more suitable.

292 293 *2. Change in Disease Status Using Diagnostic Criteria*

294
295 Sponsors should enroll trial subjects who meet DSM-5 criteria for moderate to severe stimulant
296 use disorder at baseline, based on clinical interview. These criteria include a variety of
297 symptoms and reflect how subjects feel and function. DSM-5 also provides a definition of
298 remission to be used as a specifier. After criteria for stimulant use disorder were previously met,
299 *early remission* is defined as meeting none of the criteria for stimulant use disorder for between 3
300 and 12 months, and *sustained remission* is defined as meeting none of the criteria for at least 12
301 months. Both definitions for remission contain an exception that the criterion for craving may
302 continue to be met.¹⁴

303
304 A suitable primary endpoint could be the proportion of subjects meeting criteria for early
305 remission from stimulant use disorder at the end of the trial.

306
307 We do not recommend using change in the number of DSM-5 diagnostic criteria endorsed.
308 Although this may seem to be an appropriate way to detect changes in the severity of stimulant
309 use disorder, this approach has several concerns. The DSM-5 is intended as a diagnostic
310 instrument, not a method of monitoring response to treatment. The presence or absence of many
311 criteria is determined based on an interviewer's judgment of whether the problem occurs often,
312 frequently, persistently, or recurrently. The frequency or intensity of symptoms may increase or
313 decrease without the number of criteria changing; one symptom may resolve while another
314 appears; or, potentially, several symptoms may resolve but a more concerning one may arise,

¹⁴ American Psychiatric Association, 2013, Diagnostic and Statistical Manual of Mental Disorders, 5th edition, Arlington, VA: American Psychiatric Association, 562.

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315 yielding a misleading appearance of improvement. For these reasons, FDA strongly encourages
316 sponsors interested in using endpoints reflecting disease severity to select, modify, or develop
317 suitable instruments (see section III.C.3., Use of Other Clinical Outcome Assessments).
318

319 3. *Use of Other Clinical Outcome Assessments*

320
321 Using input from patients, family members, and/or clinicians to determine the most concerning
322 symptoms or experiences associated with stimulant use disorder, sponsors could develop a
323 clinical outcome assessment (e.g., a patient-, observer-, or clinician-reported outcome measure to
324 evaluate a direct effect on how patients feel or function). A suitably developed, fit-for-purpose
325 measure that assesses relevant aspects of a subject's health status, functioning, and/or symptoms
326 may be appropriate as a primary endpoint for a clinical trial and may be the most suitable
327 approach for some investigational drugs.
328

329 FDA is also aware of interest in stimulant craving (usually defined as a strong desire or wish to
330 use stimulants) as a potential target for treatment. Craving has not been consistently defined or
331 understood, but it is viewed as a significant source of distress for patients and could be a suitable
332 target for treatment. FDA encourages the development of a suitably developed, fit-for-purpose
333 measure of craving and envisions incorporating claims about effects on craving as secondary
334 endpoints for drugs that are effective treatments for stimulant use disorder. We are also open to
335 data demonstrating the ability of craving modification to predict clinical benefit to consider
336 craving as a potential primary endpoint.
337

338 We encourage sponsors to evaluate the effect of drugs in development for stimulant use disorder
339 on various adverse clinical outcomes. Examples of meaningful outcomes may include reduced
340 overall or overdose mortality or fewer hospitalizations. Similarly, FDA is interested in outcome
341 measures that sponsors might use to demonstrate clinical benefit of investigational drugs for
342 treating stimulant use disorder such as improvements in the ability to resume work, school, or
343 other productive activity or fewer encounters with the criminal justice system. We are open to a
344 well-designed, appropriately justified composite endpoint, as described in the guidance for
345 industry *Multiple Endpoints in Clinical Trials* (October 2022).¹⁵
346

347 FDA recognizes that evaluating these outcomes could require larger trials than those usually
348 conducted for marketing approval. However, collecting data on clinically meaningful outcomes
349 even if not intended as primary support for a regulatory decision would be highly valuable, and
350 FDA encourages sponsors to consider collecting such data. Furthermore, using these outcomes
351 as clinical trial endpoints may help to validate endpoints that may be considered for use in
352 clinical trials in the future. It is of note that retention in treatment is not recommended as a
353 stand-alone endpoint. Many features of trial design can produce incentives to remain in
354 treatment without accruing clinical benefit. If a sponsor plans to include novel endpoints in a
355 drug development program for treating stimulant use disorder, FDA strongly encourages the
356 sponsor to discuss such plans with the division early in the drug development process.
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¹⁵ We update guidances periodically. For the most recent version of a guidance, check the FDA guidance web page at <https://www.fda.gov/regulatory-information/search-fda-guidance-documents>.

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IV. BENEFIT-RISK CONSIDERATIONS

When selecting an endpoint to demonstrate efficacy for a specific drug, sponsors should consider that, ultimately, the demonstrated benefit of a drug will be weighed against the risk under FDA’s drug approval standard (section 505(d) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 355(d))).¹⁶ Uncertainties regarding benefits and risks are considered when making an approval determination; a drug with greater risks may require a greater magnitude and certainty of benefit to support approval.¹⁷ If the drug itself has abuse potential,¹⁸ FDA may consider the public health effects of the drug as part of the overall benefit-risk assessment, including the drug’s potential effect on risks to both patients and nonpatients, such as members of the patient’s household (e.g., children, visitors). The risks considered may include those related to misuse,¹⁹ abuse, stimulant use disorder, overdose, and accidental exposures, particularly in children.²⁰

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V. LABELING

Regardless of the outcome measure chosen, a drug that has been determined to be safe and effective could be indicated for the “treatment of [specific drug] use disorder” and modified by the level of severity studied (e.g., “moderate to severe methamphetamine use disorder”).

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FDA envisions that the indication would generally mirror the studied population (potentially including the stimulant route(s) of administration for the studied population);²¹ however, the labeled population is determined based upon the results of the clinical program that may support use in a broader or narrower population than was studied.²² It is possible that a drug with

¹⁶ See also the draft guidance for industry *Demonstrating Substantial Evidence of Effectiveness for Human Drug and Biological Products*.

¹⁷ See footnote 16.

¹⁸ As used in this guidance, the term *abuse* refers to the intentional, nontherapeutic use of a drug for its desirable psychological or physiological effects. The term *abuse* is used in this document to describe a specific behavior that confers a risk of adverse health outcomes. FDA is committed to reducing stigma, expanding therapeutic options, and ensuring access to evidence-based treatment for individuals with substance use disorders.

¹⁹ As used in this guidance, the term *misuse* refers to the intentional use, for therapeutic purposes, of a drug in a manner other than as prescribed or by an individual for whom it was not prescribed.

²⁰ See the draft guidance for industry *Benefit-Risk Assessment for New Drug and Biological Products* (September 2021). When final, this guidance will represent the FDA’s current thinking on this topic.

²¹ See the draft guidance for industry *Diversity Plans to Improve Enrollment of Participants From Underrepresented Racial and Ethnic Populations in Clinical Trials* (April 2022). When final, this guidance will represent the FDA’s current thinking on this topic.

²² See the draft guidance for industry *Indications and Usage Section of Labeling for Human Prescription Drug and Biological Products — Content and Format* (July 2018). When final, this guidance will represent the FDA’s current thinking on this topic.

Contains Nonbinding Recommendations

Draft — Not for Implementation

383 clinical trials finding efficacy and safety in multiple populations using different stimulants, in
384 different contexts, by different routes, could be approved for a broad indication for the treatment
385 of stimulant use disorder. An *all-comers* trial could theoretically support such a broad indication
386 if it were convincingly positive in all subgroups, but the size of a trial needed to support such a
387 conclusion could likely make it less practical than studying groups separately.
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VI. EXPEDITED PROGRAMS

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392 FDA encourages the development of treatments for stimulant use disorder and novel trial
393 designs. Stimulant use disorder development programs may be eligible for one or more of
394 FDA's expedited programs, as applicable. FDA encourages early discussion of drugs that could
395 treat stimulant use disorder and may be eligible for expedited programs.
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398 These expedited programs and their relevant criteria are described in the guidance for industry
399 *Expedited Programs for Serious Conditions – Drugs and Biologics* (May 2014). Potentially
400 applicable expedited programs include fast track designation, breakthrough therapy designation,
401 priority review designation, and accelerated approval. Although each program differs, they all
402 offer some form of expedited review and guidance for sponsors of drug development programs
for serious or life-threatening conditions to address unmet medical need.