The Best Pharmaceuticals for Children Act

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Best Pharmaceuticals for Children Act

- Enacted January 2002, will sunset
 October 2007
- Continues exclusivity provision of FDAMA
- Purpose: pediatric labeling

Pediatric Research Equity Act (PREA)

- Codifies the 1998 Pediatric Rule into law
- ◆Passed November 19, 2003
- Signed into law December 5, 2003

Pediatric Labeling

- Pre-approval: Pediatric Research Equity Act
- On-patent:
 - Best Pharmaceuticals for Children Act which continues the exclusivity provisions of FDAMA
 - Studies supported by the NIH Foundation
- Off-patent: Best Pharmaceuticals for Children Act

Best Pharmaceuticals for Children Act

- In pediatric oncology
 - prioritize new drugs for study
 - assure timely access to new treatments
 - develop pre-clinical models of pediatric cancers

Best Pharmaceuticals for Children Act

- Mechanism to study on-patent drugs
 - referral to NIH Foundation
- Mechanism to study off-patent drugs

Master List of all Off-Patent Drugs which lack adequate pediatric labeling N=169

Consider for prioritizing:

- Availability of S/E data
- •Are additional data needed?
- •Will new studies produce health benefits?
- •Reformulation?

Consultation with experts in pediatric practice and research

Develop, prioritize, publish an Annual List N=15-20

Priority List

- Developed by NIH
- In consultation with
 - Institutes and Centers of the National Institutes of Health
 - Federal Agencies
 - Food and Drug Administration
 - Centers for Disease Control and Prevention
 - pediatric subspecialists and subspecialty groups
 - committees of the American Academy of Pediatrics

Drugs on the Priority List: January 2003

FR 68: 13; Jan 21, 2003

- Azithromycin
- Baclofen
- Bumetanide
- Dobutamine
- Dopamine
- **♦** Furosemide
- Heparin

- Lithium
- Lorazepam
- Rifampin
- Sodiumnitroprusside
- Spironolactone

Drugs on the Priority List: August 2003

FR 68: 156; Aug 13, 2003

- Ampicillin/sulbactam
 Metoclopramide
- Diazoxide
- ♦ Isoflurane
- **♦** Lindane
- Meropenem

- Piperacillin/ tazobactam
- Promethazine

Drugs on the Priority List: February 2004 FR 69:30; February 13, 2004

- Ampicillin
- **♦**Ketamine
- Vincristine
- Dactinomycin
- ♦ Metolazone

Drugs on the Priority List: January 2005

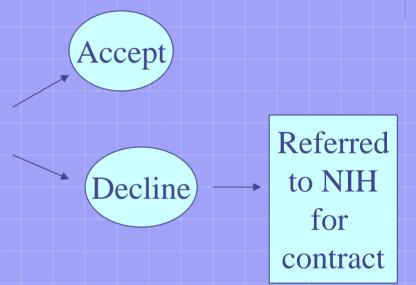
FR 70:3937; January 27, 2005

- **♦** Ivermectin
- Hydrocortisone valerate
- Hydrochlorothiazide
- Ethambutol
- Griseofulvin
- Methadone
- Hydroxychloroquine

FDA Issues a Written Request

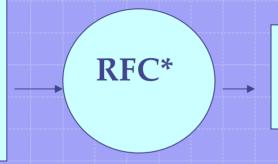
From Priority List
FDA issues
Written Request
(WR)

WR sent to Holders of NDA/ aNDA



Contracting Process

WR referred to NIH



RFP*

FedBizOpps

Proposals peer-reviewed

Contract(s) awarded

*RFC=request for contract *RFP=request for proposal

NIH: Process for Contracts

NIH publishes the Request for Proposal (RFP) in FedBizOpps

Methods of Funding

- **♦**Grant
- Cooperative Agreement
- **♦**Contract

Post-Award

- Study performed (NIH holds IND)
- Data analyzed
- Results submitted to NIH, data published on the BPCA web site
- Results submitted to the FDA, placed on public docket, for labeling

Results So Far...

Written Requests Issued by FDA

- Lorazepam
 - Sedation
 - Status epilepticus
- Nitroprusside
- Azithromycin for Ureaplasma pneumonia
- Azithromycin for Chlamydia
- Baclofen
- **Lithium**

Written Requests Issued by FDA

- **♦**Lindane
- Rifampin for MRSA endocarditis
- Meropenem
- **♦**Vincristine
- Dactinomycin

Written Requests Declined by Industry

- Off-patent:
 - Lorazepam (2)
 - Nitroprusside
 - Azithromycin for Ureaplasma pneumonia
 - Azithromycin for Chlamydia
 - Lithium
 - Baclofen*
 - Rifampin for MRSA endocarditis

Written Requests Declined by Industry

- Off-patent
 - Meropenem
 - Vincristine
 - Dactinomycin

Written Requests Declined by Industry

- On-patent:
 - Morphine
 - Baclofen
 - Bupropion
 - Sevelamer
 - Zonisamide
 - Hydroxyurea
 - Dexrazoxane
 - Eletriptan

Written Requests Published in the Federal Register for Comment

- Azithromycin for Ureaplasma pneumonia/prevention of bronchopulmonary dysplasia
- Azithromycin for Chlamydia
- Rifampin for MRSA endocarditis
- Meropenem for complicated intraabdominal infections

Drugs Proposed by the Children's Oncology Group

- Doxorubicin
- Daunorubicin
- Methotrexate

Contracts

- Contracts awarded
 - Lorazepam: sedation in ventilated patients
 - Lorazepam: status epilepticus
 - Nitroprusside: controlled hypotension
 - Ketamine: pre-clinical toxicology studies
 - Vincristine: pediatric malignancies
 - Dactinomycin: pediatric malignancies
 - Lithium: acute mania in bipolar disease

RFPs developed

- Azithromycin (IV) for Ureaplasma pneumonia and prevention of BPD
- Azithromycin (PO) for treatment and prevention of Chlamydia trachomatis pneumonia and conjunctivitis
- Meropenem for complicated intraabdominal infections
- Baclofen (PO) for spasticity related to cerebral palsy

Coordinating Center

Purpose:

- Coordinate patient enrollment
- Coordinate, monitor data collection
- Report adverse events and other data (usually blinded) to Data Safety Monitoring Board (DSMB)
- Analyze, organize results into a supplemental NDA for submission to FDA
- Contract awarded to Premier Research, Philadelphia, Pennsylvania

Questions from NIH to the Pediatric Subcommittee of the Oncology Drug Advisory Committee

- Prioritization process for deciding which off-patent drugs should be studied
 - Health benefit
 - Number of patients affected
 - Lack of other drugs that treat the disease
 - Severity of the disease

Questions

- Other drugs that should be studied
 - Antineoplastics
 - Supportive Care
 - Anti-emetics
 - Anti-infectives
 - Analgesics
 - Other

Summary

- Work in Progress
- Partnership with FDA
- NIH responsible for
 - prioritizing list
 - providing input on the Written Request
 - sponsoring clinical studies in children that will produce improvement in pediatric

therapeutics



