

**VHA Infectious Diseases Program Office,  
Pulmonary & Critical Care Field Advisory Group, and  
Pharmacy Benefits Management - Medical Advisory Panel**

**Criteria Checklist for Drotrecogin Alfa (activated)**

<b>CONTRAINDICATIONS</b>	
<p>1. Any of the following:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Active internal bleeding</li> <li><input type="checkbox"/> Recent (within 3 months) hemorrhagic stroke</li> <li><input type="checkbox"/> Recent (within 2 months) intracranial or intraspinal surgery, or severe head trauma requiring hospitalization</li> <li><input type="checkbox"/> Trauma with an increased risk of life-threatening bleeding</li> <li><input type="checkbox"/> Presence of an epidural catheter</li> <li><input type="checkbox"/> Intracranial neoplasm or mass lesion or evidence of cerebral herniation</li> <li><input type="checkbox"/> Known hypersensitivity to drotrecogin alfa (activated) or any component of the product</li> <li><input type="checkbox"/> Life expectancy &lt; 1 month or decision not to pursue aggressive medical care (not in the package insert, however patients in this category were excluded from the pivotal study)</li> </ul>	<p>(1 or more?)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> yes</li> <li><input type="checkbox"/> no</li> </ul> <p><i>If yes, patient is NOT eligible to receive drotrecogin alfa</i></p>
<b>SUSPECTED OR PROVEN INFECTION</b>	
<p>2. Patient has known or suspected infection defined as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Positive culture</li> <li><input type="checkbox"/> White cells in a normally sterile body fluid</li> <li><input type="checkbox"/> Perforated viscus</li> <li><input type="checkbox"/> Radiological and clinical evidence of pneumonia</li> <li><input type="checkbox"/> Other syndrome with high probability of infection (e.g., ascending cholangitis)</li> </ul>	<p>(1 or more?)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> yes</li> <li><input type="checkbox"/> no</li> </ul> <p><i>If no, patient is NOT eligible to receive drotrecogin alfa</i></p>
<b>MONITORING</b>	
<p>3. Patient is receiving continuous monitoring in the intensive care unit</p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> yes</li> <li><input type="checkbox"/> no</li> </ul> <p><i>If no, patient is NOT eligible to receive drotrecogin alfa</i></p>
<b>SIRS (MUST HAVE 3 OF THE 4 FOLLOWING CRITERIA)</b>	
<p>4. Pt has three or more signs of SIRS as defined as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Core temp of <math>\geq 100.4</math> F (<math>38^{\circ}\text{C}</math>) or <math>\leq 96.8</math> F (<math>36^{\circ}\text{C}</math>)</li> <li><input type="checkbox"/> HR of <math>\geq 90</math> beats/minute</li> <li><input type="checkbox"/> RR <math>\geq 20</math> breaths/min or <math>\text{PaCO}_2 \leq 32</math> mmHg or mechanical ventilation for acute (not chronic) respiratory process</li> <li><input type="checkbox"/> WBC <math>\geq 12,000/\text{mm}^3</math> or <math>\leq 4,000/\text{mm}^3</math> or <math>\geq 10\%</math> immature neutrophils</li> </ul>	<p>(3 or more?)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> yes</li> <li><input type="checkbox"/> no</li> </ul> <p><i>If no, patient is NOT eligible to receive drotrecogin alfa</i></p>
<b>ORGAN SYSTEM DYSFUNCTION</b>	
<p>5. Dysfunction of 2 or more organs or systems defined as:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <b>CARDIOVASCULAR:</b> Arterial systolic BP <math>\leq 90</math>mmHg <b>OR</b> a mean arterial pressure (MAP) <math>\leq 70</math>mmHg for at least 1 hour despite adequate fluid resuscitation or adequate intravascular volume status, <b>OR</b> the need for vasopressors to maintain systolic blood pressure (SBP) <math>\geq 90</math> mm Hg or MAP <math>\geq 70</math> mm Hg</li> <li><input type="checkbox"/> <b>RENAL:</b> Urine output <math>&lt; 0.5</math> ml/kg/hr for <math>&gt; 1</math> hour, despite adequate fluid resuscitation</li> <li><input type="checkbox"/> <b>RESPIRATORY:</b> <math>\text{PaO}_2/\text{FiO}_2 \leq 200</math></li> <li><input type="checkbox"/> <b>HEMATOLOGIC:</b> Platelet count <math>&lt; 80,000/\text{mm}^3</math> or decreased by 50% from highest value in the previous 72 hours</li> <li><input type="checkbox"/> <b>METABOLIC:</b> PH <math>\leq 7.30</math> or base deficit <math>\geq 5</math> mEq/L with plasma lactate <math>&gt; 1.5</math> times the upper limit of normal</li> </ul>	<p>(2 or more?)</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> yes</li> <li><input type="checkbox"/> no</li> </ul> <p><i>If no, patient is NOT eligible to receive drotrecogin alfa</i></p>

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<b>APACHE II</b>	
6. APACHE II $\geq$ 25 and $<$ 53 as calculated on basis of physiologic and laboratory data obtained within the immediately preceding 24 hour period ( <a href="http://www.sfar.org/scores2/scores2.html">http://www.sfar.org/scores2/scores2.html</a> ). Treatment need not be delayed while gathering data to calculate the APACHE II score as long as the patient meets the other criteria, however, the APACHE II score <u>must</u> be completed as soon as possible.	<input type="checkbox"/> yes <input type="checkbox"/> no
<b>ACUITY</b>	
7. Less than 48 hours after the onset of the first sepsis induced organ dysfunction	<input type="checkbox"/> yes <input type="checkbox"/> no
<b>WARNINGS:</b> According to the package insert, the increased risk of bleeding should be carefully considered when deciding whether to use drotrecogin therapy for patients with one or more of the following conditions.	
<p><b>The following conditions <u>led to exclusion from the phase III trial:</u></b></p> <ul style="list-style-type: none"> <li>• Concurrent therapeutic heparin (greater than or equal to 15 units/kg/hr)</li> <li>• Platelet count <math>&lt;</math>30,000, even if the platelet count is increased after transfusions</li> <li>• Prothrombin time-INR <math>&gt;</math>3.0</li> <li>• Recent (within 6 weeks) gastrointestinal bleeding (unless corrective surgery had been performed)</li> <li>• Recent administration (within 3 days) of thrombolytic therapy (except for treatment of thrombosed catheters)</li> <li>• Recent administration (within 7 days) of aspirin or glycoprotein IIb/IIIa inhibitors</li> <li>• Recent (within 3 months) ischemic stroke (<b>see contraindications</b>)</li> <li>• Intracranial arterio-venous malformation or aneurysm</li> <li>• Known bleeding diathesis</li> <li>• Chronic severe hepatic disease (portal hypertension, cirrhosis, chronic jaundice or ascites)</li> </ul> <p><b>The following <u>did not lead to exclusion from the phase III trial:</u></b></p> <ul style="list-style-type: none"> <li>• Recent administration (within 7 days) of oral anticoagulants or platelet inhibitors other than aspirin</li> <li>• Any other condition in which bleeding is a significant hazard or would be particularly difficult to manage</li> </ul>	
<b>Other warnings</b>	
In patients with single organ dysfunction and recent surgery (within 30 days), all-cause mortality was higher in patients receiving drotrecogin compared to the placebo group.	
<b>OTHER CAUTIONS:</b> The effectiveness of drotrecogin has not been established in patients with the following conditions, all of which led to exclusion from the phase 3 trial.	
<ul style="list-style-type: none"> <li>• Age <math>&lt;</math> 18 years or weight <math>&gt;</math> 135 kg (298 pounds)</li> <li>• Recent administration (within 12 hours) of greater than 10,000 U of antithrombin III</li> <li>• Patients who are pregnant or breastfeeding</li> <li>• Surgery requiring general or spinal anesthesia within the preceding 12 hours, active post-operative bleeding, intracranial surgery within 3 months, or anticipated surgery requiring general or spinal anesthesia during the infusion</li> <li>• Trauma considered to increase the risk of bleeding</li> <li>• Hypercoagulable condition</li> <li>• Highly suspected deep venous thrombosis or pulmonary embolism</li> <li>• Acute pancreatitis with no established source of infection</li> <li>• HIV+ with <math>\leq</math> 50 CD4<sup>+</sup> cells or status-post bone marrow, lung, liver, pancreas or small bowel transplant</li> <li>• Chronic renal failure requiring hemodialysis or peritoneal dialysis (acute renal failure was not an exclusion)</li> <li>• Recent (within 3 months) documented or highly suspected DVT or pulmonary embolism</li> </ul>	
Patient meets <u>all</u> inclusion criteria and does not have any contraindications	
<input type="checkbox"/> yes <input type="checkbox"/> no	

Approved by Physician: \_\_\_\_\_ Date/time: \_\_\_\_\_  
 (Must be a critical care fellow or an infectious diseases / critical care / pulmonary attending)

Patient name ( & last 4 digits of SSN): \_\_\_\_\_ Reviewer: \_\_\_\_\_

APPROVED       NOT APPROVED

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**CLINICAL STUDIES**

The efficacy of Drotrecogin was studied in an international, multi-center, randomized, double-blind, placebo-controlled trial of 1690 patients with severe sepsis. Entry criteria included a systemic inflammatory response presumed due to infection and at least one associated acute organ dysfunction. Acute organ dysfunction was defined as one of the following: cardiovascular dysfunction (shock, hypotension, or the need for vasopressor support despite adequate fluid resuscitation); respiratory dysfunction (relative hypoxemia (PaO<sub>2</sub>/FiO<sub>2</sub> ratio <250)); renal dysfunction (oliguria despite adequate fluid resuscitation); thrombocytopenia (platelet count < 80,000/mm<sup>3</sup> or 50% decrease from the highest value the previous 3 days); or metabolic acidosis with elevated lactic acid concentrations. Patients received a 96 hour infusion of Drotrecogin at 24 µg/kg/hr or placebo starting within 48 hours after the onset of the first sepsis induced organ dysfunction. Exclusion criteria encompassed patients at high risk for bleeding (*see* **CONTRAINDICATIONS** and **WARNINGS**), patients who were not expected to survive for 28 days due to a pre-existing, non-sepsis related medical condition. The primary efficacy endpoint was all-cause mortality assessed 28 days after the start of study drug administration. Prospectively defined subsets for mortality analyses included groups defined by APACHE II Score. The APACHE II score was calculated from physiologic and laboratory data obtained within the 24-hour period immediately preceding the start of study drug administration irrespective of the preceding length of stay in the Intensive Care Unit. Baseline APACHE II score was correlated with risk of death; among patients receiving placebo, those with the lowest APACHE II scores had a 12% mortality rate, while those in the 2nd, 3rd, and 4th APACHE quartiles had mortality rates of 26%, 36% and 49%, respectively. The observed mortality difference between Drotrecogin and placebo was limited to the half of patients with higher risk of death, i.e., APACHE II score =25, the 3rd and 4th quartile APACHE II scores (Table 1). The efficacy of Drotrecogin has not been established in patients with lower risk of death, e.g., APACHE II score < 25.

Table : 28-Day All-Cause Mortality for All Patients and for Subgroups Defined by APACHE II Score

	<b>Drotrecogin</b>	<b>Placebo</b>	<b>Absolute mortality difference (%)</b>	<b>Relative Risk (RR)</b>	<b>95% CI for RR</b>
	<b>N (mortality%)</b>	<b>N (mortality%)</b>			
Overall	850 (25%)	840 (31%)	-6	0.81	0.70 – 0.93
<b>APACHE II quartile (score)</b>					
1 <sup>st</sup> + 2 <sup>nd</sup> (3 – 24)	436 (19%)	437 (19%)	0	0.99	0.75 – 1.30
3 <sup>rd</sup> and 4 <sup>th</sup> (25 – 53)	414 (31%)	403 (44%)	-13	0.71	0.59 – 0.85

**CONTRAINDICATIONS** and **WARNINGS** (see front page for contra-indications and additional warnings)

Bleeding is the most common serious adverse effect associated with Drotrecogin therapy. Each patient being considered for therapy with Drotrecogin should be carefully evaluated and anticipated benefits weighed against potential risks associated with therapy.

Should clinically important bleeding occur, immediately stop the infusion of Drotrecogin. Continued use of other agents affecting the coagulation system should be carefully assessed. Once adequate hemostasis has been achieved, continued use of Drotrecogin may be reconsidered. Drotrecogin should be discontinued 2 hours prior to undergoing an invasive surgical procedure or procedures with an inherent risk of bleeding. Once adequate hemostasis has been achieved, initiation of Drotrecogin may be reconsidered 12 hours after major invasive procedures or surgery or restarted immediately after uncomplicated less invasive procedures.

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In a separate analysis of the PROWESS data, all-cause mortality was higher with drotrecogin in patients with single organ dysfunction and recent surgery (within 30 days) compared to placebo. For drotrecogin, the 28-day and in-hospital mortality was 10/49 (20.4%) and 14/48 (29.2%) respectively compared to 8/49 (16.3%) and 8/47 (17.0%) respectively for the placebo group. The higher risk of all-cause mortality was also seen in a preliminary analysis of results from the ADDRESS study. In the subgroup with single organ dysfunction AND recent surgery, the 28-day and in-hospital mortality rate was 67/323 (20.7%) and 76/325 (23.4%) respectively in the drotrecogin group compared to 44/313 (14.1%) and 62/314(19.8%) respectively the placebo group.

## **PRECAUTIONS**

### **Laboratory Tests**

Most patients with severe sepsis have a coagulopathy that is commonly associated with prolongation of the activated partial thromboplastin time (APTT) and the prothrombin time (PT). Drotrecogin may variably prolong the APTT. Therefore, the APTT cannot be reliably used to assess the status of the coagulopathy during Drotrecogin infusion. Drotrecogin has minimal effect on the PT and the PT can be used to monitor the status of the coagulopathy in these patients.

## **FURTHER DETAILS**

More details regarding drotrecogin are available in the presentation to the FDA Advisory Board (see [http://www.fda.gov/ohrms/dockets/ac/01/slides/3797s1\\_01\\_Lilly-CORE/](http://www.fda.gov/ohrms/dockets/ac/01/slides/3797s1_01_Lilly-CORE/) and [http://www.fda.gov/ohrms/dockets/ac/01/slides/3797s1\\_02\\_Forsyth/](http://www.fda.gov/ohrms/dockets/ac/01/slides/3797s1_02_Forsyth/)) and the formula for calculating APACHE II scores (<http://www.sfar.org/scores2/scores2.html>).

The criteria checklist was initially prepared by VISN 22 and Greater Los Angeles VA Medical Center clinical staff. The VHA Infectious Diseases Program Office, Pulmonary & Critical Care Field Advisory Group, and Pharmacy Benefits Management - Medical Advisory Panel clinical staff assisted in its review.