FDA Perspective

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Special Aspects of the Situation

- Product to prevent the toxicity of a lethal biologic agent that could be involved in military or other emergency settings (e.g., an act of terrorism)
- Product may provide meaningful therapeutic benefits over existing treatments
 - Need for alternatives to treat individuals exposed to lethal biologic agent
 - Alternatives that address the issue of potential antimicrobial resistance of the biologic agent
- Traditional efficacy studies in humans not feasible
 - Unethical to expose volunteers to potentially lethal biological agent
 - Field trials not feasible

Available Evidence to Support Efficacy

- Understanding of the pathophysiology of the disease
- Understanding of the mechanism of action of the drug and its prevention of the pathologic process
- Demonstration of a protective effect in an animal species with a response predictive for humans
 - Non-human primate model of inhalational anthrax
 - Endpoint is clearly related to desired benefit in humans (survival)
- Information on the pharmacokinetics and pharmacodynamics in animals and humans to allow selection of an effective dose

Available Evidence for Efficacy and Safety

