Pediatric Safety Review of OFIRMEV® (acetaminophen) Injection

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 Cadence welcomes the opportunity to share the pre-approval and post-marketing safety experience with OFIRMEV (IV acetaminophen) with the Committee and the FDA

 Cadence supports FDA efforts to mitigate the risk of medication errors resulting in acetaminophen overdose



Introduction

- 10 years of world-wide safety experience with IV acetaminophen incorporated in US NDA
 - allowed Cadence to work with FDA to structure OFIRMEV label to mitigate the risk of medication errors and acetaminophen overdose
- US label differs in several important ways from that of foreign IV acetaminophen labels
- Educational program designed and implemented to:
 - assist with selection of appropriate OFIRMEV dose
 - alert health care professionals not to exceed the daily maximum acetaminophen dose by any route
 - 4000 mg for adults and adolescents weighing 50 kg or more
 - for children, a weight-based 75 mg/kg daily maximum dose



IV Acetaminophen: Pediatric Postmarketing Safety Experience

- Estimated IV acetaminophen exposure:
 - US 1.4 to 1.8 million patients
 - World-wide >36 million patients
- Safety reports of medical errors resulting in pediatric acetaminophen overdose since 2006:
 - 27 reports involving pediatric patients
 - Only one from US experience (8 month old child administered 113 mg/kg OFIRMEV)
 - Up to 20-fold overdoses of IV acetaminophen occurred
 - No correlation between mg/kg overdose and adverse outcome
- Foreign medication errors fall into the following categories:
 - Most common (≈ 50%) are confusion as to appropriate dose or clear mistakes (kg vs. lbs; single vs. daily dose)
 - 10-fold overdose (mg vs. mL confusion) were common (≈ 1/3rd)
 - Administration of entire "pediatric" vial content (50 mL)
 - Incorrect administration route e.g., intra-arterial or epidural
 - Concomitant oral and IV dosing was rare



IV Acetaminophen: Pediatric Postmarketing Safety Experience

- 18/27 of the pediatric overdose cases are in the < 2 years old category not currently indicated in the US
 - Most dose confusion outside the US appears to be in neonates and young infants:
 - approved IV dose (7.5 mg/kg) is different than recommendations in authoritative texts (e.g. Harriet Lane, 15 mg/kg for PO/PR dosing) or published literature (loading dose up to 20 mg/kg and interval dose of 15 mg/kg)
 - To date, OFIRMEV use in < 2 age group appears to be minimal
 - lack of dosing guidance for any route of administration
 - PK section of OFIRMEV label suggest a 50% or 33% dose reduction in neonates and infants, respectively



OFIRMEV Prescribing Information

OFIRMEV. (acetaminophen) injection

HIGHLIGHTS OF PRESCRIBING INFORMATION

These highlights do not include all the information needed to use OFIRMEV® safely and effectively. See full prescribing information for OFIRMEV

OFIRMEV (acetaminophen) Injection Initial U.S. Approval: 1951

- INDICATIONS AND USAGE

- OFIRMEV (acetaminophen) injection is indicated for the Management of mild to moderate pain (1)
- Management of moderate to severe pain with adjunctive opioid analgesics (1)
- Reduction of fever (1)

of 4 hours. (2.2)

- DOSAGE AND ADMINISTRATION -

- OFIRMEV may be given as a single or repeated dose. (2.1) OFIRMEV should be administered only as a 15-minute intravenous infusion. (2.4)
- Adults and Adolescents Weighing 50 kg and Over: 1000 mg every 6 hours or 650 mg every 4 hours to a maximum of 4000 mg per day. Minimum dosing interval

Adults and Adolescents Weighing Under 50 kg:

15 mg/kg every 6 hours or 12.5 mg/kg every 4 hours to a maximum of 75 mg/kg per day. Minimum dosing interval of 4 hours. (2.2)

Children ≥ 2 to 12 years old: 15 mg/kg every 6 hours or 12.5 mg/kg every 4 hours to a maximum of 75 mg/kg per day. Minimum dosing interval of 4 hours. (2.3)

- DOSAGE FORMS AND STRENGTHS -

- Injection for intravenous infusion. Each 100 mL glass vial contains 1000 mg acetaminophen
- (10 mg/mL). (3) CONTRAINDICATIONS

Acetaminophen is contraindicated:

- In patients with known hypersensitivity to acetaminophen
- or to any of the excipients in the IV formulation (4) In patients with severe henatic impairment or severe active

-WARNINGS AND PRECAUTIONS

- Administration of acetaminophen in doses higher than recommended may result in hepatic injury, including the risk of severe hepatotoxicity and death. (5.1)
- Do not exceed the maximum recommended daily dose of acetaminophen (5.1)

FULL PRESCRIBING INFORMATION: CONTENTS*

- INDICATIONS AND USAGE
- DOSAGE AND ADMINISTRATION
- General Dosing Information Recommended Dosage: Adults and Adolescents
- Recommended Dosage: Children
- Instructions for Intravenous Administration DOSAGE FORMS AND STRENGTHS
- CONTRAINDICATIONS
- WARNINGS AND PRECAUTIONS
- 5.1 Hepatic Injury
- Allergy and Hypersensitivity
- ADVERSE REACTIONS
- 6.1 Clinical Trial Experience
- DRUG INTERACTIONS
- 7.1 Effects of other Substances on Acetaminophen
- Anticoagulants USE IN SPECIFIC POPULATIONS
- - 8.2 Labor and Delivery
- Nursing Mothers
- 8.4 Pediatric Use
- 8.5 Geriatric Use
- Patients with Hepatic Impairment 8.7 Patients with Renal Impairment
- 10. OVERDOSAGE
- 11. DESCRIPTION

Use caution when administering acetaminophen in patients with the following conditions: hepatic impairment or active henatic disease, in cases of alcoholism, chronic malnutrition, severe hypovolemia, or severe renal

Discontinue OFIRMEV immediately if sympton associated with allergy or hypersensitivity occur. Do not

- ADVERSE REACTIONS -

The most common adverse reactions in patients treated with OFIRMEV were nausea, vomiting, headache, and insomnia in adult patients and nausea, vomiting, constipation, pruritus,

To report SUSPECTED ADVERSE REACTIONS. contact Cadence Pharmaceuticals Inc. at 1-877-647-2239 or FDA:

DRUG INTERACTIONS

sodiu

FULL PRESCRIBING INFORMATION INDICATIONS AND USAGE

OFIRMEV® (acetaminophen) injection is indicated for

- the management of mild to moderate pain
- the management of moderate to severe pain with adjunctive opioid analgesics
- the reduction of fever.

2 DOSAGE AND ADMINISTRATION 2.1 General Dosing Information

OFIRMEV may be given as a single or repeated dose for the treatment of acute pain or fever. No dose adjustment is required when converting between oral acetaminophen and

intravenous infusion. Do not add other medications to the OFIRMEV vial or infusion device.

For doses less than 1000 mg, the appropriate dose must be withdrawn from the vial and placed into a separate container prior to administration. Using aseptic technique, withdraw the appropriate dose (650 mg or weight-

based) from an intact sealed OFIRMEV vial and place the measured dose in a separate empty, sterile contain

Maximum to al

daily dose of

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the use of acetaminophen. Clinical signs included swelling of the face, mouth, and throat, respiratory distress, urticaria, rash, and pruritus. There were nfrequent reports of life-threatening anaphylaxis equiring emergent medical attention. Discontinue OFIRMEV immediately if symptoms associated vith allergy or hypersensitivity occur. Do not use OFIRMEV in patients with acetaminophen

lowing serious adverse reactions are sewhere in the labeling:

Injury [see WARNINGS AND UTIONS (5.1)] and Hypersensitivity [see WARNINGS

RECAUTIONS (5.2)

Trial Experience

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from

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nours,

trials are conducted under tions, adverse reaction rates directly compared to rates in and may not reflect the rates

ents have received including 37.3% e doses, and 17.0% nan 10 doses. Most FIRMEV 1000 mg (n=134) received

t occurred in adult TRMEV or placebo rolled clinical trials greater frequency Table 2. The most lult patients treated % and greater than ng, headache, and

Reactions Occurring frequency than Placebo

33 (9)

cv data is included in s that the antipyretic Observed During

es of OFIRMEV in Adults owing additional treatment-emergent tions were reported by adult subjects OFIRMEV in all clinical trials nat occurred with an incidence of at least 1% and at a frequency greater than placebo

Blood and lymphatic system disorders: anemia General disorders and administration site conditions: fatigue, infusion site pain, edema

Investigations: aspartate aminotransferase increased, breath sounds abnormal

Metabolism and nutrition disorders: hypokalemia Musculoskeletal and connective tissue disorders: muscle spasms, trismus

Psychiatric disorders: anxiety

Respiratory, thoracic and mediastinal disorders:

Vascular disorders: hypertension, hypotension

Pediatric population

A total of 355 pediatric patients (47 neonates, infants, 171 children, and 73 adolescents) have received OFIRMEV in active-controlled (n=250) and open-label clinical trials (n=225). including 59.7% (n=212) who received 5 or more doses and 43.1% (n=153) who received more than 10 doses. Pediatric patients received OFIRMEV doses up to 15 mg/kg on an every 4 hours, every 6 hours, or every 8 hours schedule. The maximum exposure was 7.7, 6.4, 6.8, and 7.1 days in neonates, infants, children, and adolescents, respectively.

The most common adverse events (incidence ≥ 5%) in pediatric patients treated with OFIRMEV were nausea, vomiting, constipation, pruritus, agitation, and atelectasis.

Other Adverse Reactions Observed During Clinical Studies of OFIRMEV in Pediatrics

The following additional treatment-emergent adverse reactions were reported by pediatric subjects treated with OFIRMEV (n=355) that occurred with an incidence of at least 1%.

Blood and lymphatic system disorders: anemia Cardiac disorders: tachycardia

Gastrointestinal disorders: abdominal pain, General disorders and administration site

conditions: injection site pain, edema peripheral,

Investigations: hepatic enzyme increase Metabolism and nutrition disorders: hypoalbuminemia, hypokalemia. hypomagnesemia, hypophosphatemia, hypervolemia

Musculoskeletal and connective tissue disorders: muscle spasm, pain in extremity

Nervous system disorders: headache Psychiatric disorders: insomnia Renal and urinary disorders: oliguria

Respiratory, thoracic and mediastinal disorders: pulmonary edema, hypoxia, pleural effusion, stridor, wheezing

Skin and subcutaneous tissue disorders: periorbital edema, rash

Vascular disorders: hypertension, hypotension 7 DRUG INTERACTIONS

7.1 Effects of other Substances on Acetaminophen

Substances that induce or regulate hepatic cytochrome enzyme CYP2E1 may alter the metabolism of acetaminophen and increase its hepatotoxic potential. The clinical consequences of these effects have not been established. Effects of ethanol are complex, because excessive alcohol usage can induce hepatic cytochromes, but ethanol also acts as a competitive inhibitor of the metabolism of acetaminophen.

7.2 Anticoagulants

Chronic oral acetaminophen use at a dose of 4000 mg/day has been shown to cause an increase



use in patients with acetaminophen allergy. (5.2)

agitation, and atelectasis in pediatric patients, (6.1)

1-800-FDA-1088 or www.fda.gov/medwatch.

5 WARNINGS AND PRECAUTIONS

5.1 Hepatic Injury

Administration of acetaminophen in doses \$ higher than recommended may result in hepatic injury, including the risk of severe hepatotoxicity and death [see OVERDOSAGE (10)]. Do not exceed the maximum recommended daily see

dose of acetaminophen

ADMINISTRATION (2)].

than 50 kg THE MAXIMUM UCITY

12. CLINICAL PHARM 12.1 Mechanism of 12.2 Pharmacodyn

Place small volume pediatric doses up to 60 mL in volume in a syringe and administer over 15 minutes using a syringe pump.

For adult and adolescent patients weighing 50 kg requiring 1000 mg doses of OFIRMEV, administer the dose by inserting a vented intravenous set through the septum of the 100 mL vial. OFIRMEV may be administered without further dilution. Examine the vial contents before dose preparation or administering. DO NOT USE if particulate matter or discoloration is observed. Administer the contents of the vial

intravenously over 15-minutes. Use aseptic

conditi hypovolemia (e.g., due to dehydration or blood loss), or severe renal impairment (creatinine clearance ≤ 30 mL/min) [see USE IN SPECIFIC POPULATIONS (8.6, 8.7)

5.2 Allergy and Hypersensitivity

There have been post-marketing reports of technique when preparing OFIRMEV for hypersensitivity and anaphylaxis associated with

12.3 Pharmacokine

NONCLINICAL TO

13.1 Carcinogenes

CLINICAL STUDIES

14.1 Adult Acute Pa

14.2 Adult Fever

16. HOW SUPPLIED/ST

*Sections or subsections or

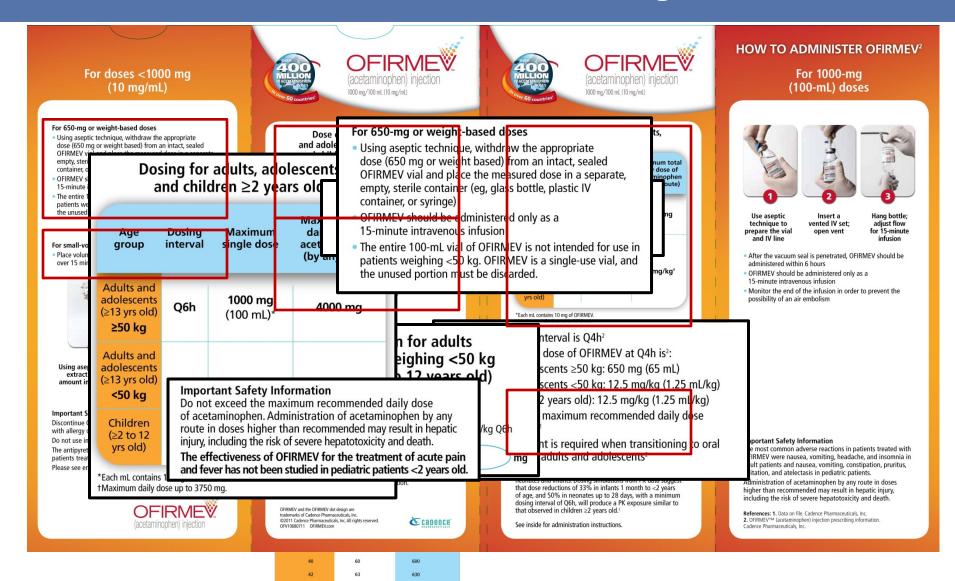
tion are not listed.

14.3 Pediatric Acut

OFIRMEV Educational Initiatives in use Since Launch

- Initial education efforts directed to healthcare practitioners designed to reinforce the importance of correct pediatric dose calculations and administration techniques
 - Appropriate use and administration instructions for all indicated age groups (video on OFIRMEV.com)
 - Dosing card: easy way to calculate the correct dose in both mg/kg and in mL/kg for all children (age 2 and older) and adults/adolescents under 50 kg weight
 - Reinforce label guidance with specific emphasis on the importance of adhering to acetaminophen maximum daily dose recommendations, by any route of administration
- Raise awareness of commonly used oral acetaminophen containing products
 - Posters and "tear-off" sheets
 - Referral to "knowyourdose.org" (Acetaminophen Awareness Coalition)
 - Medical Information letters and other educational materials on dosing and IV to oral transitions

OFIRMEV Educational Initiatives – Dosing Card





OFIRMEV Educational Initiatives – Acetaminophen-Containing Oral Medications

Rx and OTC medications containing acetaminophen The maximum total daily dose of acetaminophen administered by any route should not be exceeded. Healthcare providers should discuss with their patients the use of both prescription and OTC acetaminophen to minimize potential risk of overdosage. This list is designed to serve as a guide and is not meant to be a comprehensive directory of all available acetaminophen-containing products. It is important to carefully review each product's list of ingredients to determine whether and how much acetaminophen is contained within. Please refer to individual product labels for specific dosing guidelines. Prescription oral products containing acetaminophen (examples) Acetaminophen and Oxycodone Combinations Acetaminophen, Butalbital, and Caffeine Combinations Endocet® | Roxicet® | Percocet® Fioricet® | Zebutal® | Dolgic® Plus | Esgio-Plus® Acetaminophen and Hydrocodone Combinations Acetaminophen and Codeine Combinations Vicodin* Vicodin HP® Tylenol* w/codeine (acetaminophen and codeine) Lortab^e Zydone* Vicodin ES® Capital* w/codeine (acetaminophen and codeine) Norco® Xodol* Acetaminophen and Propoxyphene Combinations Acetaminophen and Tramadol Combinations Darvocet-Nº | Balacet Ultracet* (acetaminophen and tramadol) Acetaminophen, Dichloralphenazone, and Acetaminophen, Chlorpheniramine, Phenylephrine, Isometheptene Combinations and Phenyltoloxamine Combinations Prescription intravenous product containing acetaminophen OFIRMEY* (acetaminophen) injection OTC products containing acetaminophen (examples) Acetaminophen Single-Agent Products Acetaminophen Combination Products Acephen® Suppositories Alka-Seltzer® (various products under this brand name) Aminofen® (various products under this brand name) Anacin® Advanced Headache Formula Co-APAP® Cough Formula M Multi-Symptom Anacin[®] Tablets Apra Children's Elixir Comtrex® (rarious products under this brand name) Cetafen® harious products under this brand namel DayQuil® (various products under this brand name) Children's Silapap[®] Elixir Excedrin* Back and Body Excedrin® Extra Strength (various products under this brand name) Children's Tylenol* (various products under this brand name) Ed-APAP® Children's Solution Excedrin* Menstrual Complete ElixSure® Children's Fever Reducer/Pain Reliever Excedrin® Migraine FeverAll® (various products under this brand name) Excedrin* Tension Headache FeverAll® Junior Strength Suppositories Genace* Genapap® (various products under this brand name) Genacol® Maximum Strength Goody's" Headache Powders (various products under this brand name) Infantaire® Drops Infant's Silapap® Solution Mapap[®] frarious products under this brand name) Jr. Tylenol^e Meltaways NyQuil[®] (various products under this brand name) Mapap® (various products under this brand name) Robitussin* Night Time Cough, Cold & Flu Masophen® (various products under this brand name) Sudafed® (various products under this brand name) Nortemp® Children's Suspension O-Pap® Theraflu® (various products under this brand name) Quick Melts® francus products under this brand name) Triaminic® évanous products under this brand namel-Silapap® Children's Liquid Tylenol® Cold (various products under this brand name): Tylenol® 8 Hour Vanguish® Caplets Vicks® Formula 44® Custom Care Cough & Cold PM Tylenol® Arthritis Pain Tylenol® Extra Strength (various products under this brand name) Tylenol® Infants' Drops Tylenol® Regular Strength Tylenol® Cold Sore Throat Valorine Tablets



OFIRMEV Educational Initiatives – Day Surgery Discharge Instructions

Day surgery discharge instructions

For medications containing acetaminophen in adults weighing ≥50 kg

During your procedure, you were given acetaminophen 1000 mg (1 g) for pain control at _____ AM/PM. If you need additional pain medication at home, take as directed by your physician.

Take _____ (checked below) no sooner than ____ AM/PM.

It is important that you do not exceed the maximum amount of acetaminophen, 4000 mg (4 g), in the remaining 24 hours.

₹	Medication	Acetaminophen amount per tablet	Total tablets remaining (acetaminophen amount)
	Tylenol® Regular Strength (acetaminophen tablets)¹	325 mg	9 tablets (2925 mg)
	Tylenol® Extra Strength (acetaminophen tablets)²	500 mg	6 tablets (3000 mg)
	Tylenol® #3 (acetaminophen and codeine tablets) ³	300 mg	10 tablets (3000 mg)
	Percocet® (5 mg/325 mg or 10 mg/325 mg) (acetaminophen and oxycodone tablets) ⁴	325 mg	9 tablets (2925 mg)
	Norco® (acetaminophen and hydrocodone tablets) ⁵	325 mg	9 tablets (2925 mg)
	Lortab [®] (acetaminophen and hydrocodone tablets) [©]	500 mg	6 tablets (3000 mg)
	Vicodin [®] (5 mg/300 mg) (acetaminophen and hydrocodone tablets) ⁷	300 mg	8 tablets (2400 mg)
	Vicodin [®] (5 mg/500 mg) (acetaminophen and hydrocodone tablets) ⁷	500 mg	6 tablets (3000 mg)

These instructions are designed to serve as a guide and are not meant to be a comprehensive directory of all available acetaminophen-containing products. It is important to review each product's list of ingredients to determine whether and how much acetaminophen is contained within. Please refer to individual product labels for specific dosing guidelines.

References: 1, Regular Stiength Tylenol* [Directions for use], Fort Washington, Pix: McNeil Consumer Healthcare LLC, 2012, 2, Extra Stiength Tylenol* [Directions for use], Fort Washington, Pix: McNeil Consumer Healthcare LLC, 2012, 3, Tylenol* with Codeine No. 3 [package insert], Ranitan, N.E. Ortho McNeil Janssen Pharmaceuticals; 2011, 4. Percocet* [package insert], Claidds Ford, Pix: Endo Pharmaceuticals; 2011, 5, torco* [package insert], Corona, Chc Walson Pharma, Inc.; 2011, 6, Lortab* [package insert], Smyrna, Ghc UCB Pharma, Inc.; 2011, 7, Vixodir* [package insert], Morth Chicago, IL: Abbott Laboratorius: 2011.

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For additional information regarding OFIRMEV* (acetaminophen) injection, please see full Prescribing Information



OFIRMEV Additional Pediatric Presentations?

Smaller volume vial

- A 50 mL vial of IV acetaminophen 10 mg/mL is available for use in EU specifically for newborn infants, infants and toddlers and children < 33 kg
- The smaller "pediatric" presentation has resulted in confusion that the vial was appropriate for all children, including neonates, resulting in overdose via administration of entire vial
- Difficult to find a vial size that fits most pediatric doses and reduces overdose risk
- Current approach in the US of removing product from vial and either putting into a separate sterile container or a syringe pump for small volumes appears to be the optimal approach

More dilute concentration

- Introduction of a diluted solution could result in volume overload in low bodyweight pediatric patients and a 2nd concentration may lead to more rather than less dosing confusion
- Note that the 2009 & 2011 Advisory Committees discussing oral acetaminophen voted in favor of having one concentration of acetaminophen liquid and one concentration of oral pediatric acetaminophen products



Summary

- Cadence supports FDA efforts to mitigate the risk of medication errors resulting in acetaminophen overdose
- OFIRMEV label
 - highlights need to respect the max daily dose of acetaminophen by any route in all indicated age groups
 - Clearly states the risks of exceeding max daily dose
 - Gives clear administration instructions for small volume and pediatric use
- Cadence has introduced educational material reinforcing the OFIRMEV label and identifying common acetaminophen containing products
- Cadence does not support introduction of additional presentations or reduced concentrations of OFIRMEV as they will add confusion and increase the probability of dosing errors resulting in overdose

