
Guidance for Industry

Inhalational Anthrax (Post-Exposure) — Developing Antimicrobial Drugs

DRAFT GUIDANCE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)**

**March 2002
Clinical Antimicrobial**

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Inhalational Anthrax (Post-Exposure) — Developing Antimicrobial Drugs

*Additional copies are available from:
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26 **Guidance for Industry¹**

27
28 **Inhalational Anthrax (Post-Exposure)—**
29 **Developing Antimicrobial Drugs**
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32 This draft guidance, once finalized, will represent the Food and Drug Administration's (FDA's)
33 current thinking on this topic. It does not create or confer any rights for or on any person and does
34 not operate to bind FDA or the public. An alternative approach may be used if such approach
35 satisfies the requirements of the applicable statutes and regulations.

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39 **I. INTRODUCTION**

40
41 In response to the recent bioterrorism event involving exposure to *Bacillus anthracis*, FDA has
42 been approached by a number of firms seeking guidance on how to develop additional therapies
43 and ultimately to receive FDA-approved labeling for anthrax. This guidance focuses on the
44 development of antimicrobial drugs for administration to persons who have inhaled aerosolized
45 *Bacillus anthracis*, but who do not yet have the established disease. The treatment goal would be
46 to prevent the development of disease in such persons following exposure to *B. anthracis* spores.
47

48 This guidance is *not* intended to provide recommendations on how to treat the established
49 disease, whether inhalational anthrax, gastrointestinal anthrax, or cutaneous anthrax. This
50 guidance also does *not* address the use of other means of managing patient exposure, public
51 health agency roles, drug stockpiles, or deployment of agents following an exposure to *B.*
52 *anthracis*.
53

54 This is one in a series of guidance documents intended to assist the pharmaceutical industry in
55 the development of antimicrobial drug products for the treatment or prevention of infections.
56 The information presented here should help applicants plan, design, conduct, and appropriately
57 monitor the studies, including clinical studies, to collect relevant data for analysis, and perform
58 appropriate types and numbers of analyses of study data. Before a drug can receive a labeled
59 indication for inhalational anthrax (post-exposure), the sponsor should have extensive
60 postmarketing experience with their drug, including, ideally, prolonged drug dosing safety
61 information. For an intended use where large populations may be indicated to receive prolonged
62 antimicrobial drug dosing, extensive post-marketing safety experience is needed to formulate a
63 risk-benefit analysis between the potential benefit of effective drug therapy and the risks of
64 inhalational anthrax spore exposure and prolonged drug dosing.

¹ This guidance has been prepared by the Office of Drug Evaluation IV and the Office of Program Initiatives, representing the Division of Anti-Infective Drug Products, the Division of Special Pathogen and Immunologic Drug Products, and the Division of Anti-Viral Drug Products in the Center for Drug Evaluation and Research (CDER) at the U.S. Food and Drug Administration.

65
66 Applications submitted to the Agency on studies conducted as recommended in this guidance
67 should yield the information necessary for the Agency to determine whether the antimicrobial
68 under study is safe and effective for use in persons exposed to aerosolized *B. anthracis* who do
69 not yet have established disease. For general information on antimicrobial drug development,
70 the reader is referred to the guidance *Developing Antimicrobial Drugs — General*
71 *Considerations for Clinical Trials (General Considerations)*.

72 73 **II. BACKGROUND**

74
75 In the fall of 2001, *B. anthracis*, the bacterium that causes anthrax, was used as a bioterrorism
76 agent and sent through the U.S. mail, resulting in cases of cutaneous and inhalational anthrax in
77 New York, New Jersey, the District of Columbia, Maryland, Virginia, Florida, and Connecticut.
78 Until this time, anthrax was exceedingly rare in the United States. Approximately 220 cases of
79 cutaneous anthrax (CDC 2000) and 18 cases of inhalational anthrax (Brachman 1980) were
80 reported in the United States in the 20th century. Before 2001, the last reported case of
81 inhalational anthrax occurred in 1976 (Suffin et al., 1978). More recent recognized outbreaks
82 were reported in other parts of the world, including an outbreak in 1979, when in Sverdlovsk
83 (currently Ekaterinburg), Russia, 66 people died of inhalational anthrax after *B. anthracis* spores
84 were accidentally released from a Soviet military laboratory (Meselson et al., 1979). Data
85 available from 41 autopsies have contributed to our present knowledge concerning disease
86 pathogenesis.

87
88 A window of opportunity for preventive therapy exists between the time of inhalation of
89 aerosolized spores of *B. anthracis* and development of signs and symptoms of disease. Evidence
90 from animal models and recent human experience has demonstrated use of certain antimicrobial
91 agents *after* the inhalational exposure to *B. anthracis* spores, but *before* the development of
92 disease symptoms can be effective in preventing the disease and reducing mortality. As a result,
93 the Agency is encouraging the development of antimicrobial agents to be used in the event of
94 inhalational exposure to *B. anthracis*. This guidance provides recommendations on how to
95 develop such agents and gives examples of agents that have met approval criteria.

96 97 **A. Disease Description**

98
99 Anthrax is a bacterial infection caused by the gram-positive bacillus, *B. anthracis*.
100 A disease of antiquity, anthrax was responsible for major epidemics and mortality. The
101 incidence of the disease declined rapidly after the etiologic role of *B. anthracis* was
102 recognized and scientists such as Robert Koch and Louis Pasteur worked to introduce
103 control measures and animal vaccination.

104

105 Three types of infections are recognized in humans: cutaneous, gastrointestinal, and
106 inhalational disease. Cutaneous anthrax occurs when spores gain access through a cut or
107 abrasion in the skin. The organisms germinate and produce toxins that result in a local
108 reaction with swelling and eschar formation. The disease may progress to bacteremia,
109 and mortality is reported in up to 20 percent of untreated cutaneous cases. Cutaneous
110 anthrax can be recognized clinically, and morbidity and mortality are low with
111 appropriate antimicrobial therapy. Gastrointestinal disease is usually associated with the
112 ingestion of anthrax-contaminated meat. Gastrointestinal disease can be prevented
113 through the effective inspection of livestock and meat products entering the marketplace.
114 Inhalational anthrax follows aerosolized exposure to the spores of *B. anthracis* with
115 subsequent germination of the spores, toxin production, and invasion of the tissues and
116 blood stream by the organism. After a usual incubation period of 2 to 6 days, exposed
117 individuals develop symptomatic disease with very high mortality.

118
119 Inhalational anthrax was encountered as recently as the 19th century in industrial settings
120 when large numbers of spores were aerosolized in certain factories (e.g., woolsorter's
121 disease or ragpicker's disease) (Plotkin et al., 1960). Mortality for established disease,
122 even after treatment, was 80 to 100 percent in the 20th century. These rates may change
123 as established disease is treated in the 21st century.

124 **B. Histology**

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126
127 Extensive edema, necrosis, and hemorrhage into affected tissues, including the
128 mediastinal and hilar lymph nodes, the gastrointestinal tract, and the meninges
129 characterize histopathologic changes in human anthrax. Notably, given the respiratory
130 route of entry of the spores and deposition within the alveoli, there are only rare reports
131 of pulmonary bacterial pneumonia, such as consolidation, and inflammation within the
132 pulmonary parenchyma. However, pleural effusions are common.

133 **C. Microbiology**

134 *1. In vitro susceptibility testing*

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137
138 Currently, there are no standardized methods (e.g., disk diffusion, broth dilution, or agar
139 dilution) for the susceptibility testing of *B. anthracis*. During the bioterrorism events of
140 2001, the Centers for Disease Control and Prevention (CDC) evaluated the minimal
141 inhibitory concentrations (MICs) of several antimicrobials against the causative strains of
142 *B. anthracis* using the current National Committee for Clinical Laboratory Standards
143 (NCCLS) broth dilution method (NCCLS 2000). The suitability of the current NCCLS
144 broth dilution testing method for susceptibility testing of drugs against *B. anthracis* is
145 under evaluation by the FDA, CDC, and NCCLS. Interpretive criteria by which an
146 isolate of *B. anthracis* may be defined as susceptible or resistant to a particular
147 antimicrobial have not been determined. The Agency recommends that applicants
148 contact the NCCLS for the latest information on susceptibility testing of *B. anthracis*.²

² NCCLS can be contacted at www.NCCLS.org.

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2. *Mechanisms of resistance*

The isolates of *B. anthracis* used during the Fall 2001 bioterrorism episodes have not demonstrated high minimum inhibitory concentrations (MICs) to any of the antimicrobials tested. However, the existing literature on the susceptibility of *B. anthracis* suggests that some strains may be penicillin resistant (Lightfoot et al., 1990). In addition, the potential for multi-drug resistant strains of *B. anthracis* exists (Inglesley et al., 1999). Russian scientists claim to have produced a vaccine strain of *B. anthracis* that is resistant to penicillin and doxycycline (Stepanov et al., 1996). The potential for drug resistance supports the study of several classes of antimicrobials to prevent the development of inhalational anthrax.

The clinical relevance and importance of resistance mechanisms in strains of *B. anthracis* remains unclear. For example, certain strains of *B. anthracis* may produce beta-lactamases but administration of penicillin in animal models appears to prevent disease with these same strains. It is clear that microbiologic testing of isolates should be performed before and after drug exposure as part of the evaluation of products for prevention of inhalational anthrax. However, although the MICs for the extended-spectrum cephalosporins are not high, the efficacy of these drugs for the treatment of *B. anthracis* infection is unclear (Inglesby, et al., 1999).

III. THE MONKEY MODEL — APPLICABILITY TO THE HUMAN DISEASE

Because clinical studies of inhalational anthrax cannot be performed in humans (one cannot ethically intentionally expose patients to *B. anthracis* spores and randomize to active or placebo arms), the Agency has to rely on other evidence of efficacy for this indication. After much discussion and consideration, including input from the Anti-Infective Advisory Committee, the Agency believes that the use of the rhesus (macaque) monkey disease and treatment model for inhalational anthrax (post-exposure) provides convincing evidence of efficacy for regulatory purposes. The parallels, summarized here, between the rhesus monkey disease and treatment model and the human circumstance were noted by the Committee:

Exposure: The spores gained access to the respiratory tract via an aerosol as would be expected in human inhalational anthrax.

Antimicrobial use: The antimicrobials currently approved or found effective (ciprofloxacin, doxycycline, penicillin G procaine) were administered by the same route (oral or IM) and in the same q12h regimen in monkeys as was ultimately the recommended route and frequency in humans.

Antimicrobial Pharmacokinetics: For the drugs that have been granted regulatory approval for this indication, the peak and trough plasma concentrations measured in the rhesus model were similar to peak and trough plasma concentrations measured in humans.

196 Time course: The time course of the disease among untreated animals — short
197 incubation, rapid down hill course, mortality — is similar to that among people who died
198 of inhalational anthrax in Sverdlovsk in 1979 and in the United States in the fall of 2001.
199

200 Histopathology: The autopsy findings of inhalational anthrax reported from the
201 Sverdlovsk experience and reviewed by Dr. Walker at the July 28, 2000, Anti-Infective
202 Advisory Committee meeting are strikingly similar to the necropsy findings reported by
203 Dr. Friedlander in the monkeys that died of inhalational anthrax. Other published
204 literature support these comparative histopathological findings. (Fritz et al, 1995; Gleiser
205 et al, 1967.)
206

207 Antimicrobial Activity in Monkey Model: For the drugs currently approved for this
208 indication, the efficacy of the antimicrobial product (ciprofloxacin, doxycycline,
209 penicillin G procaine) compared to saline placebo showed a statistically significant
210 difference in favor of antimicrobial administration, whether one looked at the intent to
211 treat analysis (all animals studied) or the per protocol analysis (anthrax deaths).
212

213 A study indicating that another species of monkey was interchangeable with rhesus monkeys
214 would be considered by the Agency. The data from a monkey study could be submitted as long
215 as the model is used in conjunction with data from other sources, including:
216

- 217 • in vitro sensitivity data on *B. anthracis*
- 218 • pharmacokinetic data in animals and in humans
- 219 • information on drug efficacy in treating other infections
- 220 • evidence of safety up to and exceeding 60 days
221

222 This information, as well as convincing evidence from the rhesus monkey model, should be
223 submitted in the application for approval.
224

225

226 **IV. DRUGS EFFECTIVE IN MANAGING PATIENTS**

227

228 On August 30, 2000, the Agency approved ciprofloxacin hydrochloride tablets, ciprofloxacin
229 intravenous (IV) solution, ciprofloxacin IV in 5 percent dextrose, ciprofloxacin IV in 0.9 percent
230 saline, and ciprofloxacin oral suspension for use in the management of patients who have been
231 exposed to aerosolized spores of *B. anthracis* as a 60-day regimen. The new drug applications
232 (NDAs) submitted by the sponsor for these products included in vitro activity information,
233 pharmacokinetic data in humans and monkeys, long-term safety data on ciprofloxacin, and the
234 results of an efficacy study in nonhuman primates. This information was brought before the
235 Anti-Infective Advisory Committee with a recommendation for approval of the indication and a
236 dosing duration of 60 days.³
237

238 On November 2, 2001, in a public health response to the use of anthrax spores as a bioterrorism
239 agent, the Agency published a notice in the *Federal Register* (66 FR 55679) that clarified the

³ See transcript of meeting at <http://www.fda.gov/cder/drug/infopage/cipro/default.htm>.

240 dosing recommendations for doxycycline products and penicillin G procaine in the management
241 of patients with inhalational anthrax who had been exposed to the spores of *B. anthracis*, but
242 who did not manifest clinical disease.⁴ Drug products containing doxycycline, doxycycline
243 calcium, doxycycline hyclate, and penicillin G procaine had already been approved with
244 indications for anthrax. The *Federal Register* notice stated that the Agency “determined that the
245 language in the labeling of drug products containing doxycycline, doxycycline calcium,
246 doxycycline hyclate, and penicillin G procaine is intended to, and does, cover all forms of
247 anthrax, including inhalational anthrax (post-exposure): to reduce the incidence or progression
248 of disease following exposure to aerosolized *B. anthracis*.” The *Federal Register* notice further
249 requested that applicants for these products submit labeling supplements to update their package
250 inserts with this information.

251
252 It is relevant to the above information on ciprofloxacin, doxycycline, and penicillin G procaine
253 that the rhesus monkey study supporting the approval of ciprofloxacin also included separate
254 doxycycline and penicillin G procaine treatment arms. Each of these arms showed a survival
255 advantage over placebo (Friedlander et al., 1993). No other antimicrobial drugs were tested in
256 this study.⁵

257
258 The *Federal Register* notice also explained that other drug products are currently approved with
259 indications for anthrax or infections caused by *B. anthracis* (i.e., minocycline, tetracycline,
260 oxytetracycline, demeclocycline, and penicillin G potassium), that data on these other drugs were
261 undergoing review, and that additional data might be needed to make an explicit labeling
262 recommendation for their use in inhalational anthrax (post-exposure). This notice served to guide
263 the regulatory decisions regarding ciprofloxacin, doxycycline, and penicillin G procaine.

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265

266 **V. INHALATIONAL ANTHRAX (POST-EXPOSURE)**

267
268 The safety and effectiveness of an antimicrobial to either prevent or treat disease following
269 aerosolized exposure to *B. anthracis* cannot be tested in humans because the naturally occurring
270 disease is rare, and it is unethical to expose humans to the bacteria intentionally. As a result, an
271 application requesting approval of a drug for the indication INHALATIONAL ANTHRAX
272 (POST-EXPOSURE) should contain the elements discussed in detail in this section. Studies
273 planned and conducted as recommended in this guidance should yield the information necessary
274 for the Agency to determine whether the antimicrobial under study is safe and effective in the
275 management of this condition.

276
277 This guidance serves as our best advice under the current scenario where approved therapies are
278 available and the country is not in a state of massive-scale exposure to *B. anthracis*. In the event
279 of a large-scale exposure or absence of other approved therapies (e.g., because supplies are
280 exhausted or otherwise unavailable), the Agency would provide emergency guidance on an
281 alternative approach.

⁴ See information at http://www.fda.gov/cder/drug/infopage/penG_doxy/default.htm or www.gpo.gov.

⁵ See July 28, 2000, Advisory Committee transcript <http://www.fda.gov/ohrms/dockets/ac/cder00.htm#Anti-Infective>.

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Applications that can meet some of the elements listed below can request fast track designation while completing the development of data on the other elements.⁶

A. The Indication: Regulatory Synonyms

The Agency has determined that the indication should be designated INHALATIONAL ANTHRAX (POST-EXPOSURE) with further clarification that administration of an antimicrobial is intended “to reduce the incidence or progression of disease following exposure to aerosolized *B. anthracis*.”

Specifically, this means that drug administration should start *after* a known or suspected exposure to the aerosolized spores of *B. anthracis*, but *before* clinical symptoms of the disease develop. Some refer to this intended indication as *post-exposure prophylaxis* even though the intended administration of drug is after the exposure to *B. anthracis*.

The purpose of specifying this indication is to distinguish it from (1) the treatment of symptomatic, established inhalational anthrax infection, which is accompanied by a substantial morbidity and (2) prophylaxis of the disease, namely, administering the drug before exposure to *B. anthracis*.

B. Chemistry

There are no expected chemistry issues because it is anticipated that the drug product already will have been approved in the United States.

C. Preclinical Toxicology Data

It is anticipated that the drug product under development already will have been approved for marketing and that data are available in the approved NDA on animal toxicity in at least two species (e.g., rat, mouse, dog, monkey) for durations up to 6 months. If clinical data and experience demonstrate that a 60-day course of therapy would be reasonably safe to administer to humans, long-term animal toxicology data would not be necessary. (The drugs currently approved have been on the market from 10 to 50 years and already exceed 100 million treatment courses in the United States with additional experience worldwide.) Carcinogenicity studies may provide useful information, but are not necessary for the same reason.

D. In Vitro Microbiology Data

When ciprofloxacin was approved and the findings of efficacy published for doxycycline and penicillin G procaine, the available information on in vitro sensitivity of *B. anthracis* to these antimicrobials was extensive. The Agency had information on more than 90 isolates. When submitting a supplemental application for this indication, it would be

⁶ See guidance for industry *Fast Track Drug Development Programs — Designation, Development, and Application Review* (September 1998).

326 reasonable to submit a smaller number of isolates, particularly if there is evidence that all
327 isolates have uniformly low MICs to the drug of interest.

328
329 **Note:** The term *low MICs* is used because the FDA and NCCLS have not established
330 susceptibility breakpoints for this organism. Therefore, it would be inappropriate to state
331 that the isolates are uniformly susceptible. The goal of the in vitro testing is to
332 demonstrate that low concentrations of a drug (below those that could be achieved in
333 dosing in humans) reliably inhibit growth of *B. anthracis*. Depending on the consistency
334 and uniformity of MICs determined when testing a particular drug, it is possible that 30
335 to 50 isolates would be adequate. With multiple-fold variability in the MIC results, data
336 on a larger number of isolates should be submitted.

337
338 In summary, we recommend the following:

- 339
340 • Several strains (including Vollum, Ames, Sterne, and others) and multiple isolates
341 (from 30 to 90, as discussed above) should be tested.
- 342
343 • Testing should be done in at least two to three laboratories, and at least some of the
344 same isolates should be tested by these laboratories to demonstrate reproducibility of
MIC results.
- 345
346 • During testing, ciprofloxacin, doxycycline and/or penicillin G should be used as
control drugs.
- 347
348 • All susceptibility testing should include a wide enough range of concentrations so that
all MICs have an exact quantitative value instead of *< some value* or *> some value*.
- 349
350 • The details of the testing should be documented (e.g., a protocol should be provided).
- 351
352 • If antimicrobial resistance is detected, the mechanism should be characterized.
- 353
354 • Efforts should be made to measure the potential for development of resistance in
355 vitro. This testing should include studies to determine the frequency of spontaneous
356 mutation and the emergence of multistep resistance in the presence of the compound.
Another drug such as ciprofloxacin, doxycycline, or penicillin should be included as a
comparator. Once such information is available, attempts should be made to correlate
the mutation frequency with clinical outcome.
- 357
358 • Studies to measure reciprocal cross-resistance should also be considered using other
359 drugs such as ciprofloxacin, doxycycline, and penicillin G (the three drugs now found
to be effective for post-exposure inhalational anthrax).

360 361 **E. Rhesus Monkey and Other Animal Models of Efficacy**

362
363 The Agency believes that until a better approach can be identified to approve drugs for
364 use in persons exposed to aerosolized *B. anthracis*, the rhesus monkey model
365 (Friedlander 1993) should be used for testing additional drugs. A study or data indicating
366 that another species of monkey is interchangeable with rhesus monkeys would be
367 considered by the Agency. The value of using this model is the similarity of (1) the
368 disease, (2) the response to therapy, and (3) systemic drug exposure in the primate model
369 when compared to humans. There also is value in replicating the efficacy results shown

370 in the original study. Study results should be available at the time the supplement is
371 submitted, not as part of a phase 4 commitment.

372

373 In summary, the following general recommendations should be followed:

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375

- The drug should be tested in a nonhuman primate model.
- A vehicle control group should be included. This would serve as a negative control to determine the progression of disease in the absence of treatment.
- Consider using penicillin, doxycycline, and/or ciprofloxacin as a positive control. This approach can serve as an active control and provide for replication of results from the initial study conducted by Friedlander et al., (1993).
- At least 10 animals per arm should be studied.
- Treatment should continue for 30 days.
- There should be a 70-day follow-up observation period after treatment is completed, for a total study duration of 100 days.
- Specify dose and dosage regimen. Animal dosages should be determined based on the anticipated human dosage regimen. The animal dose should give systemic exposures comparable to the anticipated human exposure, and the drug regimen (e.g., QD, BID) should be the same as anticipated in humans. In addition, periodic measurement of peak and trough levels should be done in animals during the study to confirm the level of drug exposure.
- The route of drug administration in animals should be applicable to human use.
- Blood samples for pharmacokinetic (PK) analysis should be collected from each drug-treated monkey. At a minimum, blood samples should be collected to determine plasma drug concentrations at the approximate time of maximum concentration (peak or C_{max}) and at the end of the dosing interval (trough or C_{min}), after first dose administration and for several successive days after steady state has been attained (at least 5 C_{max} and 5 C_{min} determinations).
- End points should include survival, bacteremia at different time intervals during or after treatment, and microbial burden in infected organs and/or tissues (e.g., blood, spleen, liver) collected at the time of necropsy.
- Bacteria cultured from animals that develop infection either on treatment or in the 60-day followup period should be tested for in vitro sensitivity to determine MICs. The MICs after treatment should be compared to the baseline values.
- Histopathology data on animals that died during the study should be recorded.

405 Applicants should also consider developing models using small animals (e.g., guinea
406 pigs), which may be more readily available and which could be used for further study of
407 drugs, drug dosing, drug regimens, and drug duration, as well as exploring drug regimens
408 and drug combinations for treatment of established disease. Although not required, the
409 development of such models would benefit public health by advancing the science and
410 knowledge in the area of animal models for the study of disease caused by *B. anthracis*.

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In addition, applicants may wish to explore the possibility of studies in other nonhuman primates such as cynomolgous or African green monkeys.

F. Clinical Pharmacology

It is important to obtain complete pharmacokinetic data on the drug in human volunteers or patients and pharmacokinetic data in the rhesus monkey in the efficacy study of inhalational anthrax (post-exposure). The purpose of obtaining these data is to demonstrate that the desired systemic exposure achieved in humans after the anticipated dosage regimen can actually be achieved and is effective in the animal model in preventing inhalational anthrax infection and consequent mortality. Alternatively, it is important to demonstrate that the systemic exposure to the antimicrobial achieved in the rhesus monkey and found effective in preventing infection and death is an exposure that is achievable in humans with an approved and/or otherwise safe-to-use dosage.

In summary, we recommend the following:

- The doses to be tested in animals and in humans should be determined. A pharmacokinetic/pharmacodynamic (PK/PD) approach may be helpful in the determination of an appropriate dosage regimen. For example, use of PK/PD parameters such as AUC/MIC and/or C_{max}/MIC may be useful for antimicrobial drugs with concentration-dependent mechanisms of bacterial killing, while the time above the MIC (T_{MIC}) may be useful for antimicrobial drugs with time-dependent mechanisms of bacterial killing.
- The route of administration should be designated and should be the same in both monkeys and humans.
- Each of at least 10 monkeys should have both peak and trough plasma concentrations determined at least 5 times during the study.
- Because it is anticipated that the drug to be tested already will be on the market, adequate pharmacokinetic data should already be available in package labeling or in the literature. If such information is not available, the sponsor should provide pharmacokinetic data after single-dose and repeat-dose administration from an adequate number of male and female subjects for the purpose of providing descriptive statistics and to show comparable systemic drug exposure to that in the animal models used to study the drug for inhalational anthrax (post-exposure).
- Pharmacokinetic data for special populations, including pediatric patients, elderly subjects (≥65 years), and subjects with renal and hepatic impairment should be provided.
- Available pharmacokinetic data in pregnant women should be submitted.
- Available data for drug excretion into human breast milk should be submitted.

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- Available pharmacokinetic data in the animals chosen for study of the drug for inhalational anthrax (post-exposure) and comparison of the pharmacokinetic and/or systemic exposure between the animals and humans should be submitted.
 - Full characterization of the metabolic profile (in vitro and in vivo) in humans and in the animals chosen to study the drug for inhalational anthrax (post-exposure) should be provided.
 - Information regarding the potential for pharmacokinetic drug interactions in humans should be submitted.
 - Information comparing the plasma protein binding of the drug in the chosen animals and in humans should be submitted.

469 **G. Efficacy in Humans for Other Indications**

470

471 It is expected that in the event of a large-scale exposure to anthrax, large numbers of
472 people would be administered antimicrobials to prevent symptomatic infection by *B.*
473 *anthracis*. As a result, the Agency recommends that drugs to be developed for this use
474 already be on the market and already show their effectiveness in the treatment of a range
475 of infectious diseases, which may include, but need not be limited to, respiratory,
476 mediastinal, intra-abdominal, bone, or meningeal infections.

477
478 In summary, we recommend the following:

- 479
- 480
- The drug to be evaluated should already be an approved *and marketed* drug.
 - The drug should be safe and effective in the treatment of a range of infectious diseases due to a variety of pathogens.

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484 **H. Evidence of Long-Term Safety in Humans**

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486 Because the anticipated duration of therapy for patients exposed to inhaled anthrax spores
487 is at least 60 days, there should be sufficient data on prolonged use of the drug in large
488 numbers of patients. The drug should have shown few and self-limited, or reversible,
489 adverse events. For example, ciprofloxacin was initially approved in 1987. By the time
490 of approval for inhalational anthrax (post-exposure) in 2000, the drug had been
491 prescribed to at least 100 million patients for the treatment of other infections.
492 Doxycycline and penicillin G procaine both have been on the worldwide market for more
493 than 30 and 50 years, respectively.

494
495 The sponsor should provide any data on adverse events that may be unique or more
496 common with longer duration of dosing compared to shorter courses of therapy.
497 In addition to long-term safety data, sponsors should provide marketing information on
498 all applicable formulations, including solid oral dosage forms, pediatric oral dosage
499 forms, and parenteral dosing forms.

500

501 Finally, the Agency is interested in reviewing all available data on the safety of the drug
502 in relevant subpopulations, including geriatric patients, adults, the pediatric population,
503 and pregnant women. Information on patients with kidney or renal impairment, as
504 appropriate, also should be submitted.

505
506 **I. Statistics**

507
508 In the animal model to support approval, the antimicrobial drug must demonstrate
509 efficacy, that is, it must be shown to be statistically superior to placebo (21 CFR 314.510
510 and 314.126).

511
512 **J. Regulatory Issues**

513
514 Unless it already carries an anthrax indication (e.g., tetracycline class agents, aqueous
515 penicillin G), the drug would be approved under § 314.500, Subpart H, accelerated
516 approval. This approval would be based on the surrogate endpoint of the relationship
517 between serum concentrations in humans and animals, in the context of the animal model
518 of efficacy, as was the case for ciprofloxacin.

519
520 **K. Labeling**

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522 Once the supplement has been approved, labeling should:

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524
- List the organism in the in vitro microbiology subsection
- 525 *Note:* The Agency does not believe including this particular organism in the in vitro
526 section of the labeling in the absence of data supporting approval of the indication is
527 appropriate.
- List the indication (e.g., inhalational anthrax (post exposure))
 - Provide the appropriate dosing regimen
 - Provide the regulatory information forming the basis of approval
 - Provide a summary of the data that served as the basis of approval
- 528
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533 **L. Postapproval Commitments and/or Requirements**

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535 Because it is anticipated that these drugs would be approved for inhalational anthrax
536 (post-exposure) under Subpart H regulations (§ 314.500), the approval letter would
537 request that confirmatory clinical data be provided in the event of an accidental or
538 intentional exposure to aerosolized *B. anthracis* (§ 314.510). Applicants should include
539 as part of their application a plan or approach to obtaining such confirmatory data in the
540 event such studies become ethical and feasible as a result of such an exposure. Among
541 other information, relevant data would include patient identifying information, a listing of
542 the drugs that were used, and data on compliance, adverse reactions, and outcomes.
543 Sponsors may wish to consult with the division about the contents of their postmarketing
544 study plan before submission to the Agency. In addition, the company would agree to
545 cooperate with relevant U.S.-based public health agencies in the collection and evaluation

546 of data on the use of the drug product in a large U.S. population exposed to *B. anthracis*,
547 should such an exposure occur.

548
549 Under Subpart H regulations, the company also would have to have any advertising or
550 promotional material for this indication cleared by the Agency before use (§ 314.550).

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553 **VI. SUMMARY**

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555 In summary, we recommend that the applicant provide information on the following:

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557 • In vitro antimicrobial sensitivity data on an adequate number of isolates, reflecting the
558 spectrum of available isolates and taking into consideration the possibility of engineered
559 resistant strains
- 560 • Clinical pharmacology data on the proposed dosing regimen of the product
- 561 • Safety data, including preclinical and clinical dose and duration data that support the use
562 of this product for long durations up to at least 60 days
- 563 • Evidence of extensive use of the product including use in geriatric patients, adults, the
564 pediatric population, pregnant women, and any other special populations
- 565 • Efficacy data in humans. Priority will be given to drugs that have been approved for a
566 variety of indications and have a fairly substantial marketing history.
- 567 • Efficacy, pharmacokinetic and histopathology data from nonhuman primate models of
568 inhalational anthrax. Efficacy data should be submitted based on a study of the
569 antimicrobial in a nonhuman primate model of inhalational anthrax that replicates the
570 Friedlander study. Other animal models may be used once the Friedlander study has
571 been replicated successfully with studies of other antimicrobials for inhalational anthrax
572 (post-exposure) and those animal models have been validated. Other animal models
573 could include nonhuman primates other than rhesus monkeys and smaller animals. The
574 ultimate goal of such studies is to find a small animal model with more readily available
575 animals to replace the rhesus monkey model so that more specific and detailed testing of
576 dosing, duration, and combinations can be done.

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