Joint Meeting of the Anesthetic Life Support Drugs Advisory Committee (ALSDAC) and Drug Safety & Risk Management Advisory Committee (DSaRM)
Holiday Inn, Gaithersburg
Two Montgomery Village Avenue, Gaithersburg, MD.
September 24, 2009

Summary Minutes

All external requests for the meeting transcripts should be submitted to the CDER, Freedom of Information office.

These summary minutes for the September 24, 2009 Meeting of the Joint Anesthetic Life Support Drugs and Drug Safety and Risk Management Advisory Committee Meeting of **the Food and Drug Administration were approved on __October 15, 2009_**

I certify that I attended the September 24, 2009 meeting of the Joint Anesthetic Life Support Drugs and Drug Safety and Risk Management Advisory Committee Meeting of the Food and Drug Administration and that these minutes accurately reflect what transpired.

_____/s/_____
Kalyani Bhatt
Designated Federal Official, ALSDAC

_____/s/_____
Jeffrey R. Kirsch, M.D.
Committee Acting Chair

Joint Meeting of the Anesthetic Life Support Drugs Advisory Committee (ALSDAC) and Drug Safety & Risk Management Advisory Committee (DSaRM)
Holiday Inn, Gaithersburg
Two Montgomery Village Avenue, Gaithersburg, MD.
September 24, 2009

Summary Minutes

The Joint Anesthetic Life Support Drugs and the Drug Safety and Risk Management Advisory Committee Meeting of the Food and Drug Administration met on September 24, 2009 at the Holiday Inn, Gaithersburg, Two Montgomery Village Avenue, Gaithersburg, Maryland. Jeffrey R. Kirsch, M.D. was the acting chair for the meeting. There were approximately 150 persons in attendance. There were 16 speakers for the Open Public Hearing Session

Attendance:

Anesthetic and Life Support Drugs Advisory Committee Members Present (voting):
Jayant K. Deshpande, M.D., Jeffrey R. Kirsch, M.D. (Acting Chair), Donald Prough, M.D., Daniel Zelterman, Ph.D.

Industry Representative Member for the Anesthetic and Life Support Drugs Advisory Committee Present (non-voting):
Bartholomew Tortella, M.D., M.T.S, M.B.A.

Drug Safety and Risk Management Advisory Committee Members Present (voting):
Elaine Morrato, Dr.P.H., M.P.H., C.P.H., Allen J. Vaida, Pharm.D, FASHP

Anesthetic and Life Support Drugs Advisory Committee and Drug Safety and Risk Management Advisory Committee Consultants Present (Temporary Voting Members):
William Cooper, M.D., Stephanie Crawford, Ph.D., Ruth Day, Ph.D., Richard A. Denisco, M.D., M.P.H., Randall Flick, M.D., Timothy S. Lesar, Pharm.D, Karl Lorenz, M.D., M.S., H.S., David Margolis, M.D., Ph.D. (Via Telephone), John Markman, M.D., Deborah Shatin, Ph.D., Martha Solonche (Patient Representative), Michael L. Yesenko (Patient Representative), Julie Zito, Ph.D.

Anesthetic and Life Support Drugs Advisory Committee Members Absent:
Sorin J. Brull, M.D., Osemwota A. Omoigui, M.D., Julia Pollack, M.D., Robert K. Stoelting, M.D., Athena F. Zuppa, M.D.

Drug Safety and Risk Management Advisory Committee Members Absent:
D. Bruce Burlington, M.D. (Industry Representative), Sander Greenland, Dr.PH., Susan Heckbert, M.D., Ph.D., Lewis Nelson, M.D., Sidney Wolfe, M.D.

Temporary Voting Member Unable to attend/cancelled attendance the morning of the meeting:
Jacqueline Gardner, Ph.D.

Open Public Speakers:

- Mary Bennett (Director of Grassroots Advocacy, American Pain Foundation)
- Don Bivins, M.D., (Medical Director Good Samaritan Hospice)

- Gregory M. Bogdan, Ph.D., (Director & Medical Toxicology Coordinator Rocky Mountain Poison & Dug Center - Denver Health Research)
- Fred Wells Brason II, (Chaplain Project Director Chronic Pain Initiative, Project Lazarus Northwest Community Care Network Community Health Liaison Chair, Substance Abuse Task Force Wilkes Healthy Carolinians Council)
- John G. Carney (Vice President, Aging and End of Life Center for Practical Bioethics)
- Maggie Buckley
- Charles Cichon **[**National Association of Drug Diversion Investigators (NADDI) Executive Director]
- Michael R. Clark, M.D., M.P.H., M.B.A. (Associate Professor & Director Pain Treatment Programs Department of Psychiatry and Behavioral Sciences The Johns Hopkins Medical Institutions)
- Penny Cowan **(**Executive Director, American Chronic Pain)
- Lennie Duensing (Executive Director, American Academy of Pain Management)
- Lisa A. Fowler, PharmD (Director Management and Professional Affairs National Community Pharmacists Association)
- Larry Golbom **(**The Prescription Addiction Show - Breaking the Silence) (A self - funded radio show)
- Steve Hayes
- Ed Vanicky
- Pete Jackson
- Beverly Paukstis, RN, M.S, C.H.P.N., C.H.P.C.A.

FOOD AND DRUG ADMINISTRATION

Center for Drug Evaluation and Research (CDER)
Joint Meeting of the Anesthetic and Life Support Drugs Advisory Committee (ALSDAC) and the Drug Safety & Risk Management Advisory Committee (DSaRM)

Holiday Inn, The Ballrooms, Two Montgomery Village Avenue, Gaithersburg, MD

AGENDA

September 24, 2009

The committees will discuss the resubmission of new drug application 22-272, OxyContin (oxycodone hydrochloride controlled-release) Tablets, Purdue Pharma L.P., and its safety for the proposed indication of management of moderate to severe pain when a continuous, around-the-clock analgesic is needed for an extended period of time. The controlled-release characteristics of this formulation are purportedly less easily defeated than other approved formulations of controlled-release oxycodone.

Call to Order Introduction of Committee	**Jeffrey R. Kirsch, M.D.** Acting Chair, ALSDAC
Conflict of Interest Statement	**Kalyani Bhatt** Designated Federal Officer, ALSDAC
Opening Remarks	**Ellen Fields, M.D., M.P.H.** Clinical Team Leader Division of Anesthesia, Analgesia, & Rheumatology Products, CDER/FDA
History of OxyContin	**Angelina Pokrovnichka, M.D.** Medical Officer Division of Anesthesia, Analgesia & Rheumatology Products, CDER/FDA
Epidemiological Findings of Drug Misuse/Abuse In the United States: OxyContin	**Catherine Dormitzer, Ph.D., M.P.H.** Epidemiologist Division of Epidemiology Office of Surveillance and Epidemiology, CDER/FDA
Sponsor Presentations	**Purdue Pharma L.P.**
Introduction	**John Stewart** Purdue President and Chief Executive Officer
	Craig Landau, M.D. Purdue Chief Medical Officer, VP Clinical, Medical and Regulatory Affairs
Polyethylene Oxide Excipent	**Craig Landau, M.D.**

	Purdue Chief Medical Officer, VP Clinical, Medical and Regulatory Affairs
Bioequivalence	**Stephen Harris, M.D.** Purdue Executive Director of Clinical Pharmacology
Approach to In Vitro Testing	**Edward Cone, Ph.D.** Adjunct Professor of Psychiatry Johns Hopkins University
In Vitro Testing Results	**Craig Landau, M.D.** Purdue Chief Medical Officer, VP Clinical, Medical and Regulatory Affairs
	Judy Lee, Ph.D. Purdue Senior Director, Analytics/Preformulation
	Jennifer Giordano Purdue Senior Research Scientist Analytics
Interpretation of In Vitro findings	**Dr. Edward Sellers, M.D., Ph.D.** Professor Emeritus of Pharmacology, Medicine and Psychiatry, University of Toronto
Conclusions and Benefit Risk Profile of Reformulation	**Craig Landau, M.D.** Purdue Chief Medical Officer, VP Clinical, Medical and Regulatory Affairs
Open Public Hearing	
. Questions for the Presenters	
Discussion and Questions to the Committee	
Adjourn	

NDA 22-272
OXYCONTIN (oxycodone hydrochloride controlled-release tablets)

The committees will begin with a closed session from 8 a.m. to 9:15 a.m. Following the closed session, from 9:15 a.m. to 4:30 p.m., the meeting will be open to the public. The committees will discuss new drug application (NDA) 22–272, OXYCONTIN (oxycodone hydrochloride controlled-release) Tablets, Purdue Pharma L.P., and its safety for the proposed indication of management of moderate to severe pain when a continuous, around-the-clock analgesic is needed for an extended period of time. This formulation was previously reviewed and discussed by these committees on May 5, 2008, and will be considered again in light of new data.

Questions to the Committee

The following questions will be posed to the committee on September 24th:

- Discuss whether the studies performed by the sponsor adequately characterize the physical attributes of the reformulated OxyContin product.

  The committee consensus was that studies performed by the sponsor did adequately characterize the physical attributes of the reformulated Oxycontin product, however, many members expressed major concern with the lack of detail in the data presented by the sponsor. Several members commented that the data that was presented lacked clinical. Most agreed that the sponsor provided data in a straight-forward, though not in a complete fashion. Some members commented that they wished the sponsor would provide a more comprehensive report to the members on the data presented sometime in the future. Several members questioned whether the effort put forth by the sponsor in their attempts to improve the current formulation will significantly improve the abuse potential of the product.

- Discuss whether the change in formulation affects the overall safety profile of OxyContin.

  There was a robust discussion of this issue and committee members expressed great concern with the overall safety profile of many of the products in this same class of drugs. Several committee members commented there was insufficient data presented by the sponsor to answer this specific question. Many members also commented that the only change to the reformulated product was the excipient, which may not be enough to support product approval. Members also made recommendations for post-marketing requirements which will provide important information on the clinical outcome of the proposed new formulation. The committee also

discussed the impact and reality of potentially changing the name of the product in efforts to affect change in perceived overall safety profile of the drug.

- Should this application for a reformulated OxyContin should be approved? (Vote)
    - Discuss the rationale for your decision

Yes- 14 No- 4 Abstain-1

The majority of the committee voted to approve the application for a reformulation of OxyContin, based upon the potential benefit it could provide to a small subset of patients.

Members commented that modification of the excipient alone was a small advance when larger safety issues surrounding the product remain. A further concern expressed by the members was that although higher doses of OxyContin are critical for many terminally ill patients, the higher dosage formulations of the current and reformulated products pose a particular and serious safety consideration for individuals who consume a dose accidentally (e.g. child) or for recreation (e.g. teenager).

There was a widespread call for post-marketing safety studies to be conducted by the sponsor. Members also supported the need for development of a comprehensive Risk Evaluation and Mitigation Strategy (REMS) at the time of approval should the proposed class-wide REMS for controlled-release opioids not yet be in effect. The committee strongly urged that the Agency take measures to ensure that the demonstrated tamper-resistance gains with this product are not misrepresented to the public by the sponsor; they stressed the critical role marketing plays in conveying the incremental improvement in the reformulated product.

The meeting adjourned at 4:30 PM