













#### Association of Off-label Drug Use and Adverse Drug Events in an Adult Population

DESIGN, SETTING, AND PARTICIPANTS DESING, 2014 The ADD PRATICIPANT IN SIGN TO SERVICE A DESING AND PRATICIPANT IN SIGN TO SERVICE A DESING A D RESULTS 3484 ADEs were found with an incidence rate of 13.2 per 10,000 person-months. The rate of ADEs for off-label use was higher (19.7) than that for on-label use (12.5). Off-label use lacking strong scientific evidence had a higher ADE rate (21.7) compared with onlabel use oer use Off-label use with strong scientific evidence had the same risk for ADEs as on-label use NCLUSIONS tion should be exercised in prescribing drugs for off-label that lack strong scientific evidence

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# FDA Approval Process

- Barriers to Entry

  Executing the trials necessary to get FDA approval can be very costly
- Inexpensive treatments would never recoup high cost of the approval process
- Running a clinical trial may not be feasible
- FDA approval is very specific and limited
  Beneficial uses of a drug or device evolve over time
- \*\* In reality, many treatments that have not gone through the FDA-approval process have demonstrated effectiveness and are widely used Quite a few are even standard of care...

\* Many clinical trials reported in the peer-reviewed literature were not done inder FDA supervision

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# **Off-Label Use Defined**

Any use of a drug not listed on the label is considered off-label to include:

- · Utilizing an approved drug for a condition or indication other than the condition for which it is approved Prescribing approved drug at different dose, frequency or route of administration than specified in the lahel
- Treating pediatrics when the product is approved to treat adults
- Although the FDA label has important marketing implications, use of an approved product is not restricted by the FDA to the limitations of the label
   Providers are allowed to use FDA-approved drugs in the treatment of a specific patient as medical
- FDA recognizes that off-label use of drugs by providers is often appropriate and may represent the standard of care *Bxample*: Intravitreal antibiotic use for reduction of post-operative endophthalmitis incidence reduction despite the fact that no FDA-approved drugs for endophthalmitis prophylaxis exist

\*\*Legal implications of off-label use primarily involves risk man

# **Investigational Use**

Investigational use suggests the use of an approved drug in the context of a clinical dy protocol If primary intent is to develop information about drug safety or efficacy or if the off-

abelius in the order of administration, dosage level, subject population or other associated risks with the use of the drug, submission of an Investigational New Drug availation is benuined.

	The	following regulations apply to the IND application process:		
	Search:		Export Excel	
	Number	- Regulation		
	210FR Pwt 201	Drug Labeling		
	21CFR Pert 312	Investigational New Drug Application		
	210FR Pwt 314	INDA and NDA Applications for PDA Approval to Market a New Drug (New Drug Approval)		
	210FR Pert 316	Orphan Drugs		
K	21CFR Pert 50	Protection of Human Subjects		
	210FR Part 54	Financial Disclosure by Clinical Investigators		
	210FR Pert 56	Institutional Review Boards		
	210FR Pwrt 58	Good Lab Practice for Noncinical Laboratory Swimail Studies		

# **Informed Consent**





\* MUST supported by qualified clinical research in peer-reviewed scientific literature specific for treatment of the indication for which the drug is prescribed











Evaluation of the evaluation













Efficacy of topical azithromycin ophthalm posterior blepharitis Adv Therapy (2008) 25:858	ic solutio	on 1%	in the t	reatmen	t of		
METHODS 21 patients diagnosed with posterior blepharitis were randomized to receive either azithromycin plus warm compresses (10) or compresses alone (11)	Comparati versus con posterior b	ve stu ventio plepha	dy between nal therapy ritis causing	topical azi in treatme DED (2019	throm ent of	ycin	
<ul> <li>All patients applied compresses to each eye for 10min BID x 14</li> </ul>	Second Vis	ii i	Arithmers on group	Corvertional group	Test value*	P-value	Sig.
Treatment group used Azasite BID x 2d then QD x 12d	Symptoms Foreign body semation	Muna5D Ranac	1.47 ± 0.73 0-3	1.33 ± 0.69 0-3	-1.452	0.152	NS
RECITIC	Lacrimation	MountSD Range	LD±0.79 0-3	1.43 ±0.77 0-3	-2.149	9.036	5
At visit 3 Azarita group demonstrated significant improvements in	Barning	Meanast Tanan	0-2	0-1	-1.177	0.244	85
MGD_MG secretions and evelid redness as compared with the	lacking	Mouna5D Ream	1.40 ± 0.56	1.80 ± 0.76	-2.314	0.024	3
compress group. In the Azasite, MGD resolved completely in 3	Vision fluctuation	Meana5D Ronar	0.63 ± 0.61	0.97±0.67	-2.000	0.049	8
patients and MG secretion returned to normal in 2 patients. Europeration of patients in the Azasite group.	Second Vi	a	Azithenenycia group Nu. = 30	Conventional group No. = 30	Test value	P-value	sig.
rated overall symptomatic relief as excellent or good.	Lid hyperoraia	Meant5D Rosed	1.60±0.99	2.10 ± 0.55	-2.611	0.011	5
	Lid collactics	ShanaMD Roman	0.02 ± 0.34	0-1	-1.336	0.187	N5
CONCLUSION	MG secretion	ManaSD	1.83 ± 0.70	2.03 ± 0.56	1.227	0.225	NS
Azithromycin ophthalmic solution in combination with warm compresses provided a significantly greater clinical benefit	Conjunctival hypercenia	Month SD Rouge	1.10±0.38 0-3	1.57 ±0.73 0-3	-4.231	0.030	5
than warm compresses alone in treating the signs and	Frolly-lischarge	MaasiMD Range	1.50 ± 0.75 0 - 3	1.40 ± 0.63	0.551	0.584	N5



Marketing caused doctors to prescribe AzaSite for uses not covered by federal healthcare programs, which paid millions of dollars in false claims



ANTI-INFLAM	MATORY F	OTENCY OF TO	PICAL OPHTH/	ALMIC STEROID	S
CHEMICAL ENTITY	Common Brand Names	In Vivo Relative Anti-Inflammatory Activity	In Vivo Percent Aqueous Protein Reduction	In Vitro Relative GCR Internaliza- tion	In Vitro Relativ Potenc
Difluprednate	Durezol	60	NA	NA	1,80
Fluorometholone	Flarex	40	NA	NA	350
Fluorometholone	FML Forte	40	80	53	350
Dexamethasone Sodium Phosphate	Maxidex, Decadron	25	90	27	400
Loteprednol Etabonate	Lotemax, Alrex	25	100	100	550
Rimexolone	Vexol	25	NA	NA	300
Medrysone	HMS	4	NA	NA	200
Prednisolone Acetate	Pred Forte	4	110	58	600
Prednisolone Acetate	Generic	4	5	33	600
Prednisolone So-	Inflamase	4	NA	NA	600





Off-Label Medication Use Duflurprednate susp	pension (Durezol 0.05%)
	FDA-approved synthetic steroid indicated for: • Post-surgical inflammation
NBC 00372607 1.04 DUREZOL Migraduate spikalasis	MOA: Disrupt the inflammatory cascade by <sup>1</sup> /immobilizing arachidonic acid, <sup>2</sup> downregulating cytokine pathways (including the VEGF). <sup>3</sup> stabilizing cell membranes and mast cell granules, inhibiting leukocyte interaction and <sup>9</sup> slowing diapedesis.
DUREZOL	**Emerging evidence of that corticosteroids also effect gene expression involving inflammation, angiogenesis, oxidative stress and apoptosis
Alcon Smit	Off-label uses identified in the literature include: • Iritis and uveitis with systemic association (Crohns and IBD) • Central retinal ischemic conditions

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Variables Cetts 	Diflupredinate group (mean±SD) -8.1±4.9	Predhisolone group (mean±SD) _9 244 6	P (Mann- Whitney U-ter
Gells ⊿Oells-3 ⊿Cells-7	-8.1±4.9	-9.244.6	
∆Cells-3 ∆Cells-7	-8.1±4.9	-92446	
∆Ceils-7			0.5
	-10±5.7	-12.4±7.2	0.4
∆Cells-14	-10.2±5.9	-13.3±8.2	0.3
ACells-21	-10.2±5.9	-13.3±8.2	0.3
△Cells-28	-10.3±5.9	-13.2±8.2	0.3
∆Cells-35	-10.3±5.9	-13.2±8.2	0.3
Flare			
∆Flare-3	-0.8±0.9	-0.9±0.8	0.8
∆Flare-7	-1.2±0.8	-1.3±0.9	0.8
△Flare-14	-1.6±0.7	-1.6±1.08	0.9
∆Flare-21	-1.7±0.6	-1.9±1.2	0.5
ΔFlare-28	-1.7±0.5	-2±1.2	0.4
∆Flare-35	-1.7±0.6	-2±1.2	0.4
	ΔCento-21 ΔCello-28 ΔCello-35 Filare ΔFlare-3 ΔFlare-7 ΔFlare-14 ΔFlare-28 ΔFlare-35	ΔOdi6-21 -10.259.9     ΔOdi6-26 -10.355     ΔOdi6-26 -10.355     ΔOdi6-35 -10.355     Plane     ΔFlare-3 -0.8±0.0     ΔFlare-7 -1.2±0.8     ΔFlare-7 -1.2±0.8     ΔFlare-21 -1.7±0.5     ΔFlare-25 -1.7±0.5     ΔFlare-35 -1.7±0.5	Jobie 3         -10.2 §s         -10.2 §s           Jiano 3         -10.2 §s         -10.2 §s           Jiano 3         -10.2 §s         -10.9 §s           Jiano 4         -12.0 §s         -10.9 §s           Jiano 4         -10.2 §s         -10.9 §s           Jiano 3         -10.2 §s         -10.2 §s           Jiano 4         -11.7 §s         -1.2 §s           Jiano 5         -1.2 §s         -1.2 §s           Jiano 6         -1.2 §s         -1.2 §s



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# Off-Label Medication Use Topical Cyclosporine (Restasis 0.05% + Cequa 0.09%)

Restasis MultiDose

A CALCER REAL

5.5 mL Rx only

# FDA-approved for: • KCS and DES

MOA: Calcineurin inhibitors that binds to lymphocytes preventing activation IL-2 which inhibits T-cellmediated immune response

#### Off-label uses identified in the literature: Uveitis

- - Post-surgical dryness
    Atopic keratoconjunctivitis / vernal keratoconjunctivitis

# PKP rejection prevention PKP rejection prevention Thygeson's keratitis, Superior limbic keratoconjunctivitis (SLK) Herpetic stromal keratitis



Methods 38 eyes of 33 patients with HSK were randomly assigned to receive either 2% C5-A or 1% prednisolone acetate eye drops All subjects received oral acyclovir 400mg BID. Silt-lamp examination, Pentacam, BCVA and IOP were evaluated at the first visit and 14 and 30 days after the treatment.

Results Within-group analysis revealed significant improvement of cornea optical density after 30d of treatment in both groups

 No significant difference between groups regarding comea opacity resolution was identified

 BCVA logMAR significantly improved in both groups after 30d of treatment and analysis between groups did not show a significant difference of BCVA improvement

Conclusions Cs-A 2% and prednisolone acetate 1% topical eye drops a effective for treatment of HSK

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Effect of brimonidine tartrate 0.15% on night-vision difficulty and contrast















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# Effect of adjuvant topical dorzolamide-timolol vs placebo in nvAMD - RCT indomized placebo-controlled clinical trial vAMD patients who had persistent exudation treal anti-VEGF injections at 4-week, 5-week or las. Patients were randomized to use imolol or artificial tears for the study duration. reventions were continued at the same intervals Results All 27 patients ioned to pl 27 patients assigned to dorzolamide-timolol and 23 gned to placebo were analyzed for the primary outcome. In (SD) age was 78.4±7 years. Mean baseline logMAR VA 0.361± 0.26 vs 0.3±1

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#### **Off-Label Medication Use** Rho-kinase Inhibitor (Netarsudil 0.02%)



FDA approved for: • Reduction of elevated IOP in patients with POAG or OHTN

MOA: Believed to reduce IOP by increasing the outflow of aqueous humor through the trabecular meshwork route; however, the exact mechanism is unknown.

#### Off-label uses identified in the literature:

DME management Corneal endothelial dysfunction (Fuchs dystrophy)































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#### Off-Label Medication Use Oral Minocycline FDA approved as an: Arestin (subgingivally) – adjunct to scaling and root planning procedures in adult periodontitis Minocin (IV) – treatment of susceptible microorganisms and alternative to PCN Solodyn (oral) – primary therapy in acne vulgaris Amzeeq (topical) – treatment of non-nodular inflammatory lesions in moderate to severe acne vulgaris MOA: Inhibition of bacterial protein synthesis resulting in bacterial stasis

Off-label\* uses identified in the literature include: Treatment of acute ischemic stroke

J Neurology (2018) 265:1871-1879								
Methods Literature search across major databases to identify all RCIs that reported following efficacy outcomes among acute stroke patients treated with minocycline vs. placebo: National Institute of Health Stroke Scale, Barthel								
Index, and modified Rankin Scale scores. Additional safety, neuroimaging	Indu er lutigener	tieccid Event	Steal Ever	Tanat 1	night M	Rick Ratio #, Random, 95% ()	10-11, Rat	don, 17% (1
and biochemical endpoints were extracted. We pooled mean differences (MD) and risk ratios (RR) from RCTs using random-effects models.	EALING Indias Bastar 2011 Langt 2017 Graptica 2013 Saberal (PSS Co	12	23 1 24 3 23 1 104	10 17 15	22.45 22.45 14.45 57.15	123 (F.F.L. 100) 175 (14), 7200 107 (14), 1300 109 (14), 202		=
Results	Hearingenetic Tar <sup>2</sup> Text for menut other		- 471.0	2.9 = 0	101.14 + 14	N		
We identified 7 RCTs comprising a total of 426 patients. Of these, additional unpublished data was obtained on contacting corresponding authors of 5 RCTs. In pooled analysis, minocycline demonstrated a	1.8.2 KD studies Owng 2912 Austa 2917 Subsend (1918 ED Time events interruptions) 1 au <sup>2</sup>	2 11	1	1	100	100-00-75, 123-0 1-00-00-22, 17-000 1-00-00-22, 17-000 1-00-00-22, 12-00 1-00-00-22, 12-00 1-00-00-22, 12-00 1-00-00-75, 123-0 1-00-00-75, 123-0 1-00-00-75, 123-0 1-00-00-75, 123-0 1-00-00-75, 123-0 1-00-00-75, 123-0 1-00-00-22, 12-00 1-00-00-22, 12-00 1-00-00-20, 12-00 1-00-00-20, 12-00 1-00-00-20, 12-00 1-00-00-00 1-00-00-00 1-00-00-00 1-00-00-00 1-00-00-00 1-00-00-00 1-00-00-00 1-00-00-00 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-0000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-000 1-00-0000 1-00-000 1-00-0000 1-00-00000000		-
favorable trend towards 3-month functional independence (RR=1.31) and	Text for ment effect	2+1.001	1+0.531					
3-month BI (MD=6.92). In AIS subgroup, minocycline was associated with higher rates of 3-month mRS-scores of 0–2 (RR=1.59) and 3-month BI	Ration 2013 Salamana (1993 ES) Tatar exercis restancements Part a Tata surger any Part a	19	# 1	1	12	1553.12		-
(MD=12.37) whereas reduced the 3-month NIHSS. Minocycline administration was not associated with an increased risk of mortality, recurrent stroke, myocardial infarction and hemorrhagic conversion.	Tenal (MSEC) Tatar exercis meterogenetic Tau <sup>1</sup> Test for swerpt effect Test for subgroup at	140 + 508 00 <sup>4</sup> (2 + 181 ) Remain O	174 - 1815, 0 - 1000 - 117, 0	191	08.8%	532 844 574 715 -	to di Gener Park	transe Managetral
Conclusions Atthough data is limited, minocycline demonstrated efficacy and seems a promising neuroportective agent in acute stroke patients, especially in AIS subgroup. Further RCIS are needed to evaluate the efficacy and safety of minocycline among ICH patients.								























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#### Off-Label Medication Use Beta-carotene (provitami<u>n A)</u>



#### Proposed MOA: Antioxidant with significant efficacy against the reactive sinalet oxygen

Supplement not regulated by FDA

- the reactive singlet oxygen

  Scavenger of cell membrane lipophilic radicals
  Modulates oxidative modification of LDL
- Modulates oxidative modification of LDL
   Chelation of oxygen-free radicals inhibiting the peroxidation of lipids.

Off-label uses identified in the literature: • Treatment and prevention of recurrent chalazion













Eye (2021) 35(6):1620-1628	1 R + 0.332	1 R=0.458	1 8+2.447
METHODS MEDUNE'8, Corknare, and Commonwealth of Agriculture Bureau abstrats: databases were searched for correlations of MPCD and visual function in adults with healthy eyes at all timepoints and all designs. Visual function outcomes reviewed included photostress recovery, contrast sensitivity, visual acuity, glare sensitivity/disability and dark adaptation.	0.000 0.0000 0.00000 0.0000 0.0000 0.0000 0.0000 0.00000 0.00000 0.000000	08 004 02 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	03 04 04 03 0 0 0 0 0 0 0 0 0 0 0 0 0 0
RESULTS In meta-analysis of 22 publications, MPOD was found to be significantly			
correlated with:	in the second second second	A 100	-
Foveal glare disability at 460 nm	1Xxx		
CONCLUSIONS	A COL	Martin and Condition	
Identified link between MPOD and visual function with	No V		X
1) Photostress recovery	Real Property and		$\sim$
2) Glare alsobility 3) Contract sensitivity			



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 Off-Label Medication Use

 Paraasym Plus Eyes

 Supplement not regulated by FDA

 Proposed MOA:

 acetylcholine release via the parasympathetic

 location

 Diff-Label uses identified in the literature\*\*:

 Off-Label uses identified in the literature\*\*:

 Stimulation of the lacrimal glands and enhanced

 tear production



# <section-header><section-header>

<ol> <li>Split into two         <ul> <li>6 month</li> <li>2 years</li> </ul> </li> <li>4 months withe study on</li> <li>Total of 114 peo</li> </ol>	o arms: s with 2-month follow-ups with 6-month follow-ups h a data collection point at the start and end of ly	Table 8 Mean ± SD	of changes (improveme	nt) in visual function			
the study on Total of 114 peo	in a data collection point at the start and end of ly	Table 8 Mean ± SE	) of changes (improveme	ent) in visual functio			
Total of 114 peo		Treatment group		rement) in visual function			
Total of 114 peo		in cathlenic group	Visual acuity	Glare radius			
	ple were enrolled in these studies with subject	9-month follow-up of	older subjects with catarac	.t			
ages ranging fro	m 55 to 80 years.	Control group	0.90 ± 0.03 (n = 36)	1.53 ± 0.07 (n = 36			
Unable to obtain	sufficient information to reliably determine	NAC-treated group	$1.54\pm 0.05^{n_+}~(n=39)$	0.41± 0.05° (n = 3			
how both these	studies were designed and conducted. We have	9-month follow-up of older adult noncataract subjects					
contacted the a	thor of these studies but have not yet received	Control group	0.96 ± 0.03 (n = 35)	1.27 ± 0.05 (n = 35			
a reply. Studies a review until suff authors.	cient information can be obtained from the	NAC-treated group	1.20 ± 0.04* (n = 37)	0.38 ± 0.05 <sup>+</sup> (n = 3			







 Off-Label Medication Use Catchad Sciences of Label And Andrew Sciences of Label And



















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# **Take Home Points** Optometric Off-Label Use Can Become On-Label FDA approved for: Treatment of presbyopia in adults Vuity

OVuity



- \*\* Mesopic effects during driving? \*\* Myopic shift? \*\* RD in susceptible eyes?

# Take Home Points **Optometric Off-Label Use Can Become On-Label** FDA approved for:Reduction of conjunctival hyperemia as OTC red-eye relief LUMIFY **MOA:** Relatively selective $\alpha$ -2 adrenergic agonist that, at the proposed OTC concentration of 0.025%, has a vasoconstrictive effect

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Treatment of hypotrichosis of the eyelashes by increasing growth including length,

MOA: Precise mechanism of action is unknown; however, the growth of eyelashes is believed to occur by increasing the <sup>1)</sup> duration and <sup>2)</sup> number of follicles in the anagen (growth) phase

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#### **Take Home Points Optometric Off-Label Use Can Become On-Label**



#### FDA approved for:

Indicated as an aid to smoking cessation treatment - Chantix

MOA: Binds with high affinity and selectivity at  $\alpha_4\beta_2$  neuronal nicotinic acetylcholine receptors

Binding produces agonist activity, while simultaneously preventing nicotine binding to  $\alpha_4 \beta_2$  receptors

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#### Take Home Points: Adjunctive Therapy **Optometric Off-Label Use**

- Topical ganciclovir 0.15% (Zirgan) QID x 7 days
- Pred Forte 1% QID + Ketorolac 0.4% QID + Dorzolamide 2% TID x 4-12 wks
- Pred Forte 1% QID + Timolol 0.5% BID + Dorzolamide 2% TID x 4-12 weeks Macular Holes
- Cyclosporine 0.05% (Restasis)



- Topical Apraclonidine 0.5% (Iopidine) BID or PRN
- Topical Brimonidine 0.2% (Alphagan-P 0.15%) BID or PRN
- Timolol 0.5% 2gtts spaced by 15 minutes PRN
- Dorzolamide 2% (Trusopt) TID x 4-12 weeks •
- Rho-kinase inhibitor 0.02% (Netarsudil) QD x 4 weeks

#### Take Home Points: Adjunctive Therapy **Optometric Off-Label Use**

- Oral Doxycycline 100mg BID x 4 weeks
- Atorvastatin 40mg and 80mg
- Oral Prednisone 1250mg QD x 3 days
- Metformin 500mg BID or Glucophage XR 500mg QD x 12 weeks
- Lisinopril 20-40mg QD x 12 weeks
- Spironolactone (Aldactone) 25mg BID x 4-12 weeks Rifampin (Rifampicin) 300mg BID x 4-12 weeks

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# Take Home Points: Adjunctive Therapy **Optometric Off-Label Use** Selenium 100ug BID x 6 months eye disease (TED) L-lysine 1000mg TID x 4 weeks AREDS 2 1 capsule BID x 52 weeks IMT: Chromium 50mcg BID x 12 weeks Beta-carotene 6mg (10,000 IU) QD [Adults] or 3mg (5,000 IU) QD [Children]

Parasym Eyes 2 capsules BID x 4 weeks\*\*

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### Limitations...

- Optometry is typically outside an integrated healthcare setting
- Private practice Corporate settings
- Off-label medication use may not be standard of care
- Adverse reactions to off-label medication use can expose • the provider to liability

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## **Opportunity...**

- Off-label, adjunctive therapy can provide meaningful medical treatment during the time between referral and specialist follow-up
- Off-label medication use can shorten duration and severity of disease condition
- Off-label medication use can reduce need for more invasive therapies

PCM teaming embraces integrated medicine

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# What's next?

- Evidence-based off-label therapy • Off-label medication use should be pharmacologically sound and backed by research
  - Pilot data drives larger scale, RCTs that can fundamentally change how medications are utilized

Off-label algorithms •

- Clinical Findings
- Drug Class
- Dosage / Duration
- Recommended follow-up and testing

## https://www.cochrane.org/evidence







