

# PIP assessment procedure

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# Objectives of the EU Paediatric Regulation

- Improve the health of children
- Increase high quality, ethical research into medicines for children
- Increase availability of authorised medicines for children
- Increase information on medicines
- Achieve the above
- Without unnecessary studies in children
- Without delaying authorisation for adults

## What is a PIP?

(1/2)

- Basis for development and authorisation of a medicinal product for all paediatric population <u>subsets</u>.
- Includes details of the <u>timing</u> and the <u>measures</u> proposed, to demonstrate:
- Quality
  Safety
  Efficacy

  Marketing

  Authorisation
  Criteria
- To be agreed upon and/or amended by the PDCO
- Binding on company → compliance check
   (but modifications possible, at the company's request)





### What is a PIP?

(2/2)

- Data on efficacy, safety and age-appropriate formulation are needed
- Timelines for start and completion of each study
- In practice: discussion on each condition/indication and formulation, for each paediatric subset (not only age-groups).

Formulation PK, PD, carcino, genotox juvenile animals

Safety - Proof of concept PK

Safety - Finding - Efficacy issues



# When is a PIP/Waiver necessary?

- Pharmaceutical companies need to produce data from paediatric studies, done in accordance with an agreed PIP, at the time of:
- Applying for a new marketing authorisation
- In case of an already authorised product, for new indications / routes of administration / formulations (but not for new strengths)
- +/- Deferral for completing the studies/measures
- Alternatively, they need a total waiver (for all indications/conditions, in all paediatric subsets). If total waiver: no PIP

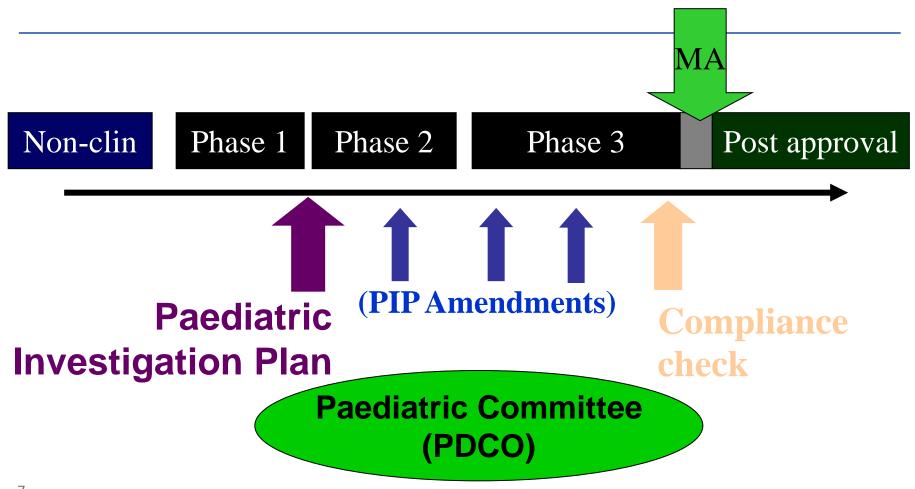


#### When is a PIP/Waiver not needed?

- Authorised products that do not have a valid Supplementary Protection Certificate (SPC) or a valid patent that qualifies for it.
   (i.e. off-patent products already authorised in the EU)
- New medicinal products that belong to some specific groups:
- Herbal medicinal products, Homeopathic products
- Generic products, Hybrid products, Biosimilar products
- Class-waivers:
- For a class of products in a condition
- For all products in a condition



# When should the PIP be requested?





# How is the PIP assessed?







**PDCO** 



#### How is the PIP assessed?

(1/2)

#### 1) Validation

- Information correctly and completely provided in forms
- Structure of application is correct
- Enough scientific information and references are provided

#### 2) Evaluation

- 60 (+ 60) days procedure with clock stop
- Comments by EMA paediatric coordinator → PDCO Rapporteur → PDCO Peer Reviewer
- 2 (+ 2) discussions in PDCO
- Request for Modifications (usually adopted at D60)



#### How is the PIP assessed?

(2/2)

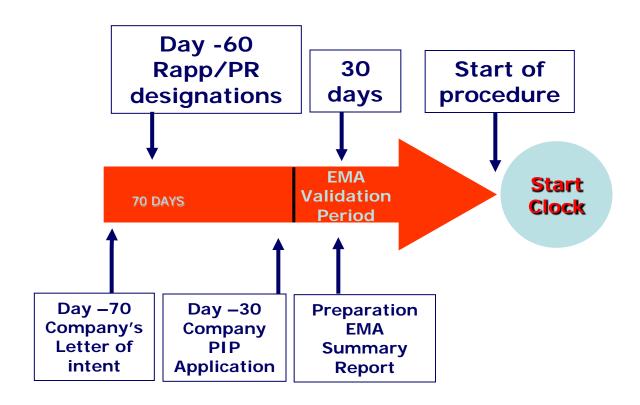
#### 3) Opinion

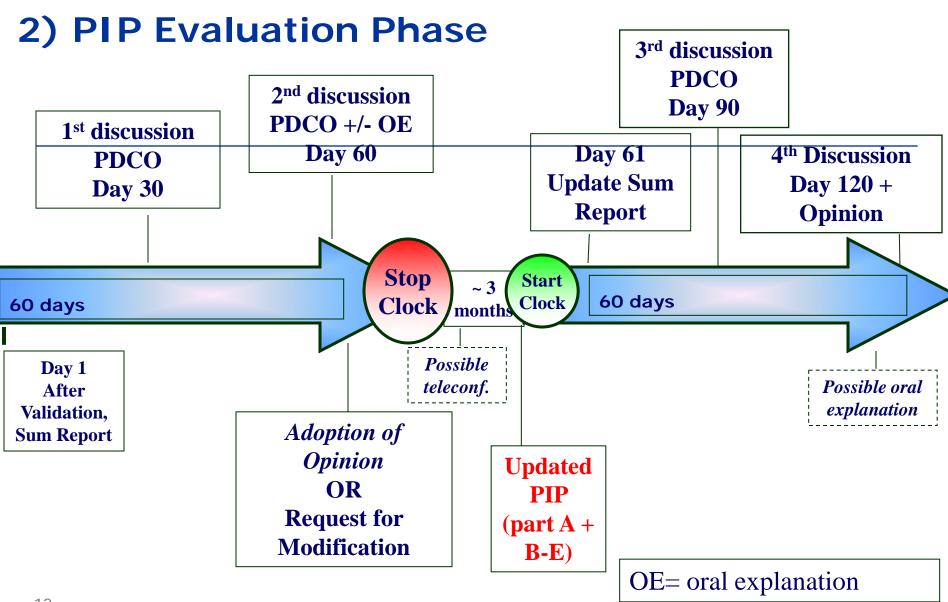
- Adopted at D60 or D120 by PDCO
- May be subject to re-examination

#### 4) Decision

- Adopted by EMA (Executive Director) and not EU Commission
- Published on website

## 1) PIP Procedure Validation Phase





# PDCO FWG in the PIP procedure

(1/3)

- Role: supports PDCO in the review process of the quality section of PIPs
- Not assessing the data (e.g. stability) but evaluating issues related to paediatric formulation development strategy (e.g. safety of excipients)
- Composition: 15 formulation experts from PDCO, QWP, NCAs, hospitals and academia + 2 US FDA representatives as observers
- Close cooperation with EMA Quality team
- Team work: 1 PIP = 1 Quality PTM + 1 FWG Topic Leader

# PDCO FWG in the PIP procedure

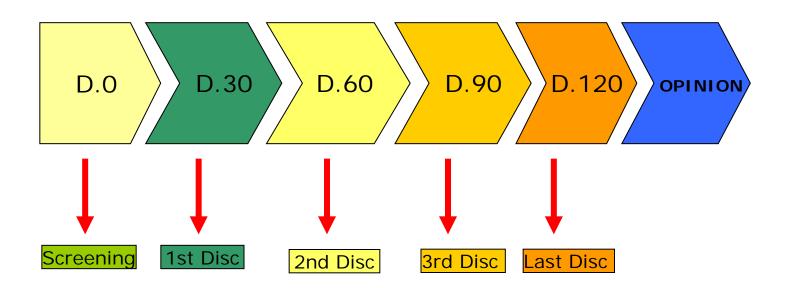
(2/3)

- Discussion before D30 and/or D60 PDCO meeting: proposals for Request for Modification
- Discussion after clock stop, before D90 PDCO meeting: review of answers provided by applicant, proposals for key binding elements in the Opinion
- FWG's comments are reflected in the summary report and, if endorsed by the PDCO, in the RfM and/or Opinion + comments in the EMA Paediatric database



# PDCO FWG in the PIP procedure

(3/3)



# Summary Report on PIP/Waiver

- To be prepared by the Agency within 30 days following receipt of the request [for agreement to a PIP] (Article 16) and validation of application
- Contains the Applicant's position
- Contains comments from EMA Coordinator, PDCO Rapporteur, PDCO Peer Reviewer, [PDCO members], PDCO FWG conclusions, NcWG conclusions
- Is usually sent to applicants four times (D30, D60, D90, D120) for transparency

# Where to find Quality information in SR?

- D.I.c Information on the existing quality, nonclinical and clinical data
- D.II Quality aspects
- D.II.a Strategy in relation to quality aspects
- D.II.b Outline of each of the planned and/or ongoing studies and steps in the pharmaceutical development
- FWG conclusions and PDCO discussion minutes

# Compliance check and MAA

- The paediatric development must be in compliance with measures and timelines agreed in PIP Decision
- Positive compliance check compulsory for validation:
- New MAA;
- New indication;
- New route of administration;
- New pharmaceutical form
- MAA assessment: PIP information available in Module 1.10

#### Conclusion

- The PIP is an integral part of the clinical development programme
- Development of suitable paediatric formulations required
- PIP assessment procedure and comments from experts involved reflected in the Summary Report
- Binding elements reflected in the PIP Opinion at the end of the PIP assessment
- PIP Decision published on EMA website and submitted in Module
   1.10 at time of MAA

# Back-up slides

# Overall structure of a PIP application

A: Administrative and Product Information

**B**: Overall development of the product

- Information on product/mode of action/condition
- Significant therapeutic benefit / therapeutic needs

C: Waiver request

D: Overall strategy for development in children

- Existing data (in adults and children)
- Proposed studies (ongoing or planned) and timelines

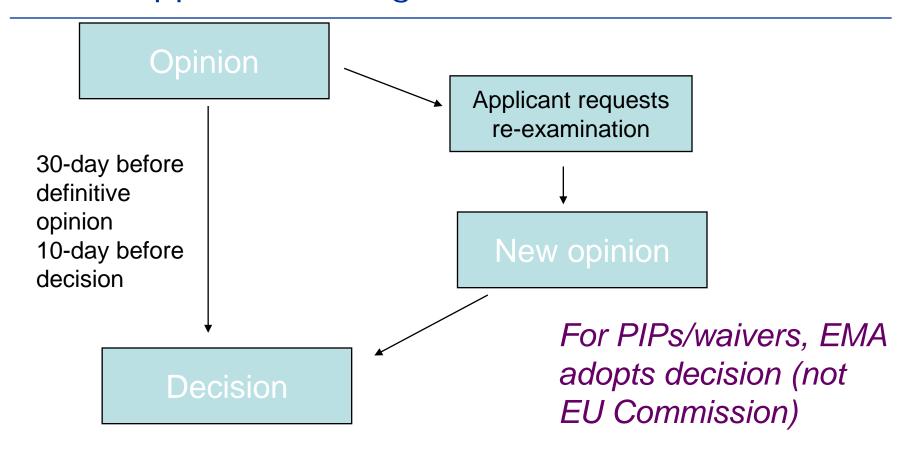
E: Request for deferral

PDF file

Scientific document (Word + PDF)

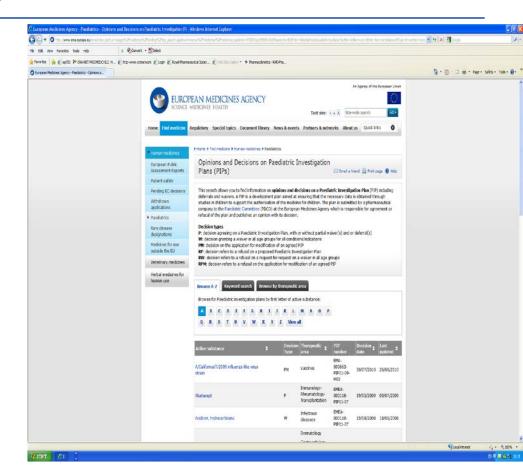


## What happens of an agreed PIP?



## What happens of an agreed PIP?

- EMA PIP Decisions published as summary on EMA Website (outline of studies not published)
- Mandatory inclusion of paediatric information in Product Information
- European database of all clinical trials (EudraCT): protocol <u>and</u> results-related information for all paediatric studies to be <u>public</u>





# Published decision/opinion

For each condition/indication:

Partial or total waiver, paed subset(s) for the PIP, formulation(s) for the PIP

 Table of all studies/measures

(Pharmaceutical, non-clinical, clinical)

 Not published: Details on individual studies/measures

#### A. CONDITION(S)

Subependymal giant cell astrocytoma Angiomyolipoma

#### B. WAIVER

Condition

Angiomyolipoma

The waiver applies to:

All subsets of the paediatric population from birth to less than 18 years of age

for tablet for oral use and dispersible tablet for oral use

on the grounds that the disease or condition for which the specific medicinal product is intended does not occur in the specified paediatric subset(s).

#### C. PAEDIATRIC INVESTIGATION PLAN

Condition to be investigated

Subependymal giant cell astrocytoma

Proposed PIP indication

Treatment of patients with subependymal giant cell astrocytomas (SEGA) associated with tuberous sclerosis complex (TSC)

· Subset(s) of the paediatric population concerned by the paediatric development

From birth to less than 18 years

Formulation(s)

Tablet for oral use Dispersible tablet for oral use



## Published decision/opinion

#### Studies

Area	Number	Description
	of studies	
Quality	-	Not applicable
Non-clinical	-	Not applicable
Clinical	3	Randomized, double-blind, placebo-controlled, parallel-group, dose-titration, comparative, multi-centre study to evaluate pharmacokinetics, safety, tolerability and activity of everolimus in children from birth to less than 18 years of age Relative bioavailability study between intact 1 mg tablet and 1 mg tablet dispersed in water in adults Bioequivalence study between intact 1 mg tablet and 2 mg dispersible tablet in adults

Measures to address long term follow-up of potential Yes

safety issues in relation to paediatric use:

Date of completion of the paediatric investigation plan: By October 2011

Deferral for initiation of some or all studies contained in No

the paediatric investigation plan:

Deferral for completion of some or all studies contained No

in the paediatric investigation plan:

# Published decision/opinion

#### Formulation(s)

- Nebuliser solution for inhalation
- Solution for infusion for subcutaneous administration
- Solution for infusion for intravenous administration

#### Studies

Area	Number	Description
	of studies	
Quality	1	Development of an age-appropriate inhalation device for children from 2 years old to less than 6 years old.
Quality	1	Development of an Intravenous formulation.
Clinical (inhaled form)	1	Multi-centre, open-label, single-dose, dose-escalating study of inhaled treprostinil sodium using an Inhalation Device in paediatric patients from 6 years old to less than 18 years old with pulmonary arterial hypertension.
Clinical (inhaled form)	1	Randomized, double blind, Placebo controlled add-on to baseline therapy, multiple-dose, parallel group study of the safety and efficacy of inhaled treprostinil sodium using an Inhalation Device in paediatric patients from 6 years to less than 18 years old with pulmonary arterial hypertension.
Clinical (inhaled form)	1	Open-label safety and tolerability study using an age-appropriate inhalation device, in paediatric patients from 2 years to less than 6 years old with pulmonary arterial hypertension.
Clinical (inhaled form)	1	Randomized, double-blind, Placebo controlled add-on to baseline therapy study using an age-appropriate inhalation device, in paediatric patients from 2 years to less than 6 years old with pulmonary arterial hypertension.
Clinical (Subcutaneous form)	1	Analyses of existing data to clarify the safety and efficacy of the parenteral formulation of treprostinil in children aged from 12 to less than 18 years, as systematic review.
Clinical	1	Randomized, double-blind, Placebo controlled add-on to baseline

# Study synopsis 1/2

Study identifier(s)	Code and/or acronym only, not company title
Type of study, study	Reflect the design briefly, e.g.,
design	randomised, add-on, in combination, double-blind, multicentre,
	single/multiple dose, placebo or active controlled, consecutive phases and
	age-staggered,
	Avoid mentioning other elements here (e.g. inclusion criteria)
Study objective(s)	E.g., efficacy, safety, pharmacokinetics, tolerability
Study population and	Here only high level information, e.g. age groups for staggered design
subset definition (incl.	
stratification)	
Number of study	Indicate if a proportion of children needs to have some characteristics, or
participants by	needs to be representative of the EU population in terms of genetic, standard
paediatric subset (e.g.,	of care, lifestyle, etc. for scientific reasons
age, sex, stratum)	
Main inclusion criteria	
Main exclusion criteria	Specific ones only
Location (e.g. regions)	Only if justified scientifically
Study duration	By each phase, incl. run-in, active treatment and follow-up
Dosage, treatment	Dosing should not use abbreviations, but state explicitly e.g., twice daily
regimen, route of	
administration	
Control(s)	E.g., placebo, for active: use INN, if too complex then use descriptive (e.g.,
	vaccine). Avoid brand names. Include doses for active
Primary endpoint(s)	In case of PK study or assessments, specify rich / sparse sampling, method of
with time point(s) of	
assessment	In general, number of samples and sampling per patient, blood volume per
	sample, method of analysis, sample volume is driven by expected variability
	Time point of assessment



# Study synopsis 2/2

Main secondary endpoint(s) with time	
points(s) of assessment	
Statistical plan	Include the population analysis (intention to treat for superiority in general,
	per protocol for non-inferiority)
	Specify interim analysis(es)
	Handling of missing values
	Type of statistical analysis
Stopping rule(s)	Only if specific for the trial
Rescue treatment	Only if appropriate
Measures to minimise	When specific
pain and distress	
Plan for specific follow-	E.g., open label extension of the study
աթ <sup>-</sup>	Attention: specify whether the PIP covers the outcome of the extension or the
-	outcome is part of the post-authorisation measures
External Data Safety	Yes / No
Monitoring Board	Should be requested in all studies in neonates, in safety/efficacy studies in
	other age groups
	No need to mention tasks
Date of initiation	<no <="" later="" month="" than=""> &lt; year&gt;&gt;</no>
	<after adults="" benefit="" established="" in="" is="" risk="" subsets="" the=""></after>
	<after <measure="" completion="" of="">&gt;</after>
	<not <date="" before="" measure="" or=""></not>
Date of completion (last	By <specify and="" month="" which="" year=""></specify>
patient, last visit)	do not include the date of finalisation and/or submission of the study report
Plan in case of	If specific
recruitment issues	
Notes	

## Modification of an agreed PIP

- Always possible if there are "difficulties with its implementation as to render the plan unworkable or no longer appropriate"
- Multiple modifications possible
- Application has same structure as original
- 60-day procedure; same EMA coordinator / Rapporteur / Peer Reviewer if possible
- New waivers/deferrals can also be requested
- New opinion/decision supersedes the original

### Two must-read

- EU Commission guideline on Format and Content of applications for agreement or modification of PIP/waivers/deferrals
- EMA Procedural advice: Q&A on website



# Additional reading

- FAQ on regulatory aspects of Regulation (EC) No 1901/2006
   (Paediatric Regulation) amended by Regulation (EC) No 1902/2006.
- Scientific guidelines of specific paediatric relevance

