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4 **Paediatric Addendum on the guidelines on clinical**
5 **investigation of medicinal products for the treatment and**
6 **prophylaxis of venous thromboembolic disease**
7 **Draft**

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Comments should be provided using this [template](#). The completed comments form should be sent to CVSWPsecretariat@ema.europa.eu

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13 investigation of medicinal products for the treatment and
14 prophylaxis of venous thromboembolic disease

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32 **Executive summary**

33 This is an addendum to the *Guideline on clinical investigation of medicinal products for the treatment*
34 *of venous thromboembolic disease* (EMA/CHMP/41230/2015) [1] and the two guidelines for
35 prophylaxis of venous thromboembolism (VTE) in surgical (EMA/CHMP/325170/2012 Rev.2) [2] and
36 non-surgical (EMA/CPMP/EWP/6235/04 Rev. 1) [3] adult patients, and should be read in conjunction
37 with these guidelines. This addendum includes guidance on paediatric clinical medicine development,
38 highlighting paediatric specific issues and differences from the treatment and prophylaxis of venous
39 thromboembolism in adults.

40 **1. Introduction (background)**

41 VTE is a rare disease in children, with an incidence that is approximately 100 times lower than in
42 adults, but represents a significant management dilemma that requires therapeutic intervention.

43 The distribution of VTE events in paediatric patients is bimodal with the majority of events occurring in
44 neonates and infants [4,5] and in adolescents [6]. In contrast to VTE in adults, VTE in children is rarely
45 truly idiopathic in nature [7]. Approximately $\geq 90\%$ of children with VTE have a serious underlying
46 disorder [e.g.: cancer, congenital heart disease (CHD), nephrotic syndrome, etc.], a precipitation
47 factor [central venous catheter (CVC), infection, trauma or surgery], or a hereditary pro-thrombotic
48 condition. Apart from better awareness for VTE, the widely observed increase in childhood VTE is
49 mainly due to the medical progress in the treatment and/or interventions of critically ill children. In
50 adolescents, VTE is generally associated to the use of hormonal contraception (HC) for contraceptive
51 and non-contraceptive indications [6].

52 The typical location of VTE in neonates and infants differs from that in adults and adolescents. In
53 neonates and young children, VTE occurs more often (60%) in the upper venous system (vs. only 2%
54 in adults). This reflects the common placement of CVC (the most frequent precipitating factor of VTE in
55 children) via the internal jugular or subclavian veins. The location of the clots results in fewer classic
56 VTE symptoms (e.g., unilateral limb swelling) and also may impair the effective/precise diagnosis with
57 standard measures [i.e. compression ultrasound (CUS) cannot be performed in this location]. Loss of
58 catheter patency and loss of central venous access have important consequences in children with
59 cancer and other serious medical conditions [7].

60 PK and PD in children may differ from that in adults. On the one hand, due to physiological differences
61 in absorption, distribution and metabolism, children may require different proportional doses than
62 adults according to body weight or body-mass index (BMI) to achieve the same level of anticoagulation
63 [8]. On the other hand, hemostasis is a dynamic process that is age dependent and continues
64 throughout life. Coagulation factors are produced by the fetal liver by 10 weeks of age. The age-
65 dependent differences in the coagulation system are most significant in neonates and infants aged < 6
66 months [9]. At birth, the plasma levels of the vitamin-K-dependent coagulation proteins (factor II, VII,
67 IX, and X) are half of the adult values and remain approximately 15% lower throughout childhood.

68 Current recommended therapeutic regimens for VTE in children are largely based upon case series and
69 cohort studies, and are otherwise extrapolated from adult VTE data. The majority of the
70 recommendations for dosing in children are based on a moderate level of evidence. The current
71 standard of care for the treatment of VTE in children is unfractionated heparin (UFH) or low molecular
72 weight heparin (LMWH) administered for 5-7 days followed by (at least) three months of LMWH or oral
73 anticoagulation with a vitamin K antagonist (VKA) [10,11]. In the absence of large randomized
74 controlled trials, and with much of our current understanding of PK extrapolated from adult studies,
75 ideal dosing for anticoagulation in critically ill neonates remains uncertain.

76 2. Scope

77 The focus of this paediatric addendum is on clinical investigation of treatment and prophylaxis of VTE
78 in neonates (first month), infants (1 month to <2 years), children (2 to <12 years) and adolescents
79 (12 to <18 years). The need for suitable endpoints and imaging techniques adapted according to the
80 localisation of VTE in children, specific methodological issues of clinical trials in children with VTE and
81 the possibility to extrapolate efficacy and safety from data in adults is discussed.

82 3. Legal basis and relevant guidelines

83 This is an addendum to the Guidelines on Clinical Investigation of Medicinal Products in the treatment
84 and prophylaxis of VTE (EMA/CHMP/41230/2015; EMA/CHMP/325170/2012 Rev.2;
85 EMA/CPMP/EWP/6235/04 Rev. 1). It should be read in conjunction with the introduction and general
86 principles of the Annex I to Directive 2001/83/EC as amended.

87 All pertinent elements outlined in the current and future EU and ICH guidelines and regulations should
88 also be taken into account especially the following:

- 89 • ICH E11, Clinical investigation of medicinal products in the paediatric population
90 (CPMP/ICH/2711/99);
- 91 • Guideline on the investigation of medicinal products in the term and preterm neonate
92 (EMA/267484/2007);
- 93 • Reflection paper on the use of extrapolation in the development of medicines for paediatrics.
94 EMA/199678/2016. London, 9 October 2017)
- 95 • Role of pharmacokinetics in the development of medicinal products in the paediatric population
96 (EMA/CHMP/EWP/147013/2004/Corr);
- 97 • Clinical trials in small populations (CHMP/EWP/83561/2005);
- 98 • Guideline on pharmaceutical development of medicines for paediatric use
99 (EMA/CHMP/QWP/805880/2012 Rev. 2);
- 100 • Ethical considerations for clinical trials on medical products conducted with the paediatric
101 population: Recommendations of the ad hoc group for the development of implementing guidelines
102 for Directive 2001/20/EC relating to good clinical practice in the conduct of clinical trials on
103 medicinal products for human use 2008.

104 4. Efficacy evaluation

105 While it may not be feasible to perform studies in children of different age cohorts that are powered to
106 provide statistically significant results for efficacy, EMA provides guidance that if there is sufficient
107 similarity between children and adults (*European Commission Guideline on the format and content of
108 applications for agreement or modification of a paediatric investigation plan and requests for waivers
109 or deferrals and concerning the operation of the compliance check and on criteria for assessing
110 significant studies (2014/C 338/01)*) extrapolations of efficacy and safety data from adults (source
111 population) to children (target population) could be used. The adequacy of extrapolating clinical
112 efficacy and safety data from adults to children or from one paediatric subgroup to another, as well as
113 the extent of this extrapolation, will depend on knowledge about the disease, understanding of the
114 clinical pharmacology of the drug as well as the reliability of the results in the source population (i.e.
115 adults or paediatric subgroups with available efficacy and safety results)[12].

116 Disease related aspects include the characteristics of VTE in neonates and young children (e.g. natural
117 course of the disease, VTE localization and risk factors) should be considered when planning and
118 conducting paediatric studies in VTE. All relevant data should be systematically reviewed to identify
119 potential differences between characteristics of the source and target populations e.g. body size, age
120 and maturation, drug exposure (PK) and their relation to pharmacodynamic response (PD) and clinical
121 efficacy [12]. It is also important to consider factors related to the susceptibility to adverse reactions,
122 mainly bleeding events (e.g. maturation of organs and systems, body mass and morphology changes,
123 immaturity in preterm neonates and long term effects). Aspects related to the investigational
124 treatment (e.g.: dose regimens, duration of therapy, monitoring requirements, possibility of
125 establishing therapeutic ranges, factors influencing dose-response relationships, side effects, and the
126 impact of general anesthesia and non-pharmacologic interventions) should also be considered.

127 As similarities between younger children and adults in clinical factors for VTE, course and response to
128 VTE treatment are not entirely straightforward, an extrapolation of efficacy and safety data from adults
129 only based on similar exposure and PD data is not supported, and some extent of efficacy and safety
130 data in children are needed. Existing data in an indication already approved in adults (e.g.: treatment
131 and secondary prevention of DVT/PE) could, however, complement the results of the paediatric studies
132 and further support the use in children based on the totality of the data without requesting a study
133 powered to test a formal statistical hypothesis in children.

134 The efficacy of antithrombotic treatment or prophylaxis in paediatric VTE can be evaluated in clinical
135 trials using combined VTE endpoints documented by objective methods. Irrespectively of the diagnostic
136 imaging technique used for documenting the events, it is recommended that all primary events
137 occurring during the trials are blindly adjudicated by an Independent Adjudication Committee, whose
138 members are experts in the field of thrombosis imaging.

139 **4.1. Primary endpoint**

140 The primary efficacy endpoint in treatment or prophylaxis trials in children, should be as broad as
141 possible to capture all VTE events (i.e.: including symptomatic and asymptomatic events), in
142 consistency with exploratory trials in adults [1-3]. Therefore, a composite endpoint is recommended as
143 follows:

- 144 • Objectively documented symptomatic and asymptomatic DVT and PE.
- 145 • VTE-related or all-cause death during the treatment.

146 **Definition of primary events:**

147 DVT and PE can be newly diagnosed (in case of primary prophylaxis, or after acute VTE if it occurs in a
148 different localisation than the primary index VTE event) or recurrent VTE (if it occurs after acute VTE in
149 the same localisation than the primary index VTE event).

150 The following definitions of primary events according to the imaging technique used are acceptable:

151 **Suspected (newly diagnosed or recurrent) DVT** may be confirmed in the presence of at least one
152 of the following findings [10]*:

- 153 • Abnormal compression ultrasound (CUS) where compression had been normal or, if non-
154 compressible during screening, a substantial increase in diameter of the thrombus during full
155 compression;
- 156 • An extension of an intraluminal filling defect, or a new intraluminal filling defect or an extension of
157 non-visualization of veins in the presence of a sudden cut-off on venography;

- 158 • An extension of an intraluminal filling defect, or a new intraluminal filling defect on computed
159 omography angiography (CTA) or magnetic resonance angiography (MRA).

160 **Suspected (newly diagnosed or recurrent) PE** may be confirmed in the presence of at least one of
161 the following findings [13]: *

- 162 • A (new) intraluminal filling defect in segmental or more proximal branches on CTA or MRA;
163 • A (new) intraluminal filling defect or an extension of an existing defect or a new sudden cut-off of
164 vessels on the pulmonary angiogram;
165 • A high-probability result on ventilation-perfusion lung scanning (VPLS);
166 • Inconclusive sCT, pulmonary angiography, or VPLS with demonstration of DVT in the lower
167 extremity.

168 **Diagnosis of symptomatic (newly diagnosed or recurrent) DVT or PE based solely on clinical signs and symptoms is
169 discouraged. The number of such episodes, especially if leading to changed or renewed therapy, must, however, be
170 noted and accommodated for in the analyses.*

171 **VTE-related or all-cause death:** VTE-related death is normally defined as a death due to PE
172 documented by objective imaging testing or autopsy, or a sudden death in which PE cannot be ruled
173 out. VTE-related death may represent the efficacy of the experimental drug more accurately than all-
174 cause death. However, given that in contemporary practice autopsies are rarely performed, most
175 deaths adjudicated as VTE-related will correspond to the latter category (i.e.: conservative diagnosis
176 due to impossibility to document fatal VTE or other causes of sudden death). All-cause death offers the
177 advantages of being less prone to bias and to comprise also deaths that can be directly or indirectly
178 related to anticoagulation (e.g.: fatal bleedings or deaths due to VTE after treatment has been stopped
179 due to bleeding). However, death rates after a VTE in children may be higher than the rate of recurrent
180 VTE depending on the underlying disease/s (e.g.: children with underlying cancer), which could result
181 in dilution of the drug effect, thus trending to the null hypothesis of no differences between
182 treatments.

183 Although both endpoints have pros and cons, it is generally recommended to include VTE-related
184 death, rather than all-cause mortality, as a part of the primary efficacy endpoint. This choice does not
185 prevent from including the composite of recurrent VTE plus all-cause death as a secondary endpoint.

186 **Deterioration in thrombotic burden (phase II trials):** In dose-finding clinical trials in the
187 treatment of VTE in adults, deterioration in thrombotic burden (i.e.: comparison between baseline and
188 end of treatment using imaging techniques) may be a part of the primary endpoint, as it can be
189 considered a treatment failure (i.e.: asymptomatic recurrence). However, thrombus burden definitions
190 available in adults [11,14] have not been validated in children, which prevents for inclusion as part of
191 the primary endpoint in confirmatory trials. Anyway, lack of vessel patency and persistent thrombus
192 assessed during and after treatment may be used as a composite secondary exploratory endpoint, as
193 these events have been associated with poor long term outcomes and post-thrombotic syndrome in
194 adults and pediatric thrombosis.

195 **Imaging methods for assessment:** The imaging technology applied is driven by the location of the
196 venous thrombosis. Extremity venous thrombosis will in most children be documented by compression
197 ultrasound (CUS), and less frequently by conventional venography. Central DVT and PE will in most
198 children be documented by contrast enhanced magnetic resonance imaging (MRA) or compute
199 angiography (CTA). PE will less commonly be diagnosed in children by ventilation-perfusion lung
200 scan/scintigraphy (VPLS) or catheter-directed pulmonary angiography.

201 The available literature, though not unanimous, suggests similar sensitivity and specificity of both MRA
202 and CTA techniques for the diagnosis of thromboembolic entities in the central venous system.
203 Comparative studies of adequate power and design, especially in the paediatric population, are
204 missing. The advantages of MRA over CTA in the assessment of the pulmonary vasculature, are lack of
205 ionizing radiation, time-resolved imaging for perfusion, and lack of iodinated contrast material.
206 Different study centres prefer different techniques for reasons of availability, cost or experience.
207 However, it is considered unacceptable to expose children to any radiation in a clinical trial when there
208 is an alternative at hand. Therefore, MRA assessments only are recommended.

209 **Time-points for assessment:**

210 In the treatment of acute VTE and/or extended treatment (secondary prophylaxis), time-points for
211 assessment should include at least baseline and end of treatment, or earlier if patient experiences
212 symptoms of recurrent VTE or new VTE. In case of trials for prophylaxis of CVC-associated thrombosis,
213 VTE has to be radiographically determined if symptoms develop (expected in only 6-10% of cases) or,
214 if patients are asymptomatic, at 1 month from catheter placement and when catheter is removed or
215 lost, or at 1 year, whichever is shorter.

216 **4.2. Secondary endpoints**

217 Main secondary efficacy endpoints of interest comprise the individual components of the composite
218 endpoint as well as deaths, like in adults (EMA/CHMP/41230/2015; EMA/CHMP/325170/2012 Rev.2;
219 EMA/CPMP/EWP/6235/04 Rev. 1). Long-term consequences of DVT (e.g.: post-thrombotic
220 syndrome/sequelae) [12], or PE (e.g.: thromboembolic pulmonary hypertension) are also of interest,
221 as they impact on quality of life and lead to complications.

222 It is strongly encouraged that phase III studies continue to collect PK and PD parameters from children
223 of different ages to allow for investigation of PK/PD relationship (see also section 6.1 about clinical
224 pharmacology studies).

225 **5. Patient selection**

226 The varied aetiology of paediatric VTE offers opportunities for inclusion of patients with diverse set of
227 characteristics, but heterogeneity of the study population may be an issue. It is recommended that
228 inclusion and exclusion criteria are well defined in order to have a predictable composition of subjects
229 and an easily identifiable target population in need for antithrombotic treatment against VTE.
230 Demographic characteristics to be collected should also be well defined to identify risk factors for VTE
231 (e.g.: cancer, congenital heart disease, trauma, thrombophilic condition, etc.) as well as concomitant
232 treatments (e.g.: thrombogenic anti-cancer medications, HC in female adolescents) that could result in
233 different VTE rates and/or treatment effects. In children on chemotherapy, it is recommended to
234 stratify the randomization according to expected or actual asparaginase chemotherapy, when
235 administered, as this is considered a major prothrombotic risk factor.

236 An adequate representation of paediatric patients of different age ranges is necessary, unless
237 scientifically justified (e.g.: condition not present in a specific age range, not expected benefit,
238 identified harm, etc). In particular, it is of importance to study paediatric patients < 2 yrs due to
239 differences in underlying aetiologies and thrombus location, as well as a not fully matured
240 coagulation/fibrinolysis system. The challenges of including neonates into anticoagulation studies, such
241 as concerns for central nervous system bleeding, are significant. A cautious approach could be the
242 exclusion of neonates from the proposed study and the initiation of a study in newborns once
243 paediatric data become available. Adolescents would be generally enrolled in dedicated paediatric

244 efficacy/safety studies. Another potential alternatives could be to include them in adult trials or even to
245 extrapolate from adults if a comparable dose could be established from PK/PD data in adolescents and
246 the cause of the VTE is comparable to causes found in adults (e.g.: VTE due to hormonal
247 contraception).

248 Several conditions could be considered to be appropriate targets for studying anticoagulant
249 prophylaxis, like CVC-related thrombosis, perioperative and periprocedural anticoagulation (e.g.:
250 cardiac catheterism, cardiac surgery), immobilisation due to trauma, etc. However, given the
251 frequency of CVC-related VTEs, a specific clinical trial is feasible and would potentially have a
252 meaningful clinical impact [9]. In thromboprophylaxis trials in children with indwelling CVCs, in whom
253 the need for thromboprophylaxis is not yet well defined, the population under investigation should be
254 restricted to patients with a CVC in the upper central venous system, while excluding peripherally
255 placed CVCs as well as those inserted into the femoral vein. The incidence of CVC-related VTEs may
256 depend on the nature of the underlying condition, e.g. cancer, trauma, surgery, congenital heart
257 disease. Furthermore, standard of care is likely to vary in different geographical regions, therefore data
258 on background therapy should be provided. Further stratification for baseline VTE-risk is
259 recommended. The same is true for the type of catheter and place of insertion. There are several
260 mechanisms by which CVCs can cause VTEs, including thrombogenic catheter materials, irritation of
261 the vessel wall, restriction of blood flow due to catheter size, location of insertion site, etc. As the
262 benefit-risk of anticoagulation may differ across different prophylactic settings (i.e.: indwelling CVCs,
263 surgical patients, immobilisation due to trauma, etc.), the results obtained in a specific setting are
264 unlikely to be extrapolated to all other situations.

265 **6. Clinical trials strategy & design**

266 **6.1. Human Pharmacology studies (Pharmacokinetic/Pharmacodynamic** 267 **[PK/PD])**

268 A difference in the PK between the adults and children (e.g.: decreased absorption, higher or lower
269 clearance), or different PD that impacts the dosing strategies is anticipated from the evidence available
270 with traditional anticoagulants (e.g.: warfarin, LMWHs). As a result, existing pop-PK model in adults
271 may unreliably predict the doses needed in children. Therefore, at least one PK study in children will be
272 needed to build a pop-PK model in children above and below 6 years following a step-wise approach
273 (starting with the older children). The challenges of including neonates into anticoagulation studies has
274 already been addressed in section 5. The influence of intrinsic (impaired renal or hepatic function) and
275 extrinsic factors (concomitant drugs altering haemostasis) that could be frequent and/or relevant in
276 the studied population should also be considered.

277 With respect to PD, it may be first investigated in an *ex vivo* coagulation test to confirm whether the
278 compound has no age-related effect on coagulation times or plasma anticoagulant activity markers. In
279 case of products already approved for use in adults, an adult physiologically-based pharmacokinetic
280 model (PBPK) may be adapted to children through a paediatric scaling approach. The model should be
281 further qualified by comparison with the paediatric data available. Based on the PBPK approach, the
282 dose per kg body weight and even the administration interval may differ per weight group to
283 accommodate for physiological characteristics (e.g.: differences in C_{max} , C_{min} , AUC, etc due to
284 differences in clearance and/or absorption). Dosing based on body weight (BW) only is recommended if
285 no relevant differences are found compared with dosing based on body surface area (BSA), and
286 appears acceptable and a simple method to prevent dosing errors.

287 With respect to PK/PD relationship, suitable PD markers should be those identified in the adult
288 populations. Depending on specific compounds, these markers may comprise coagulation times [e.g.:

289 prothrombin time (PT), activated partial thromboplastin time (aPTT), ecarin clotting time (ECT), diluted
290 thrombin time (dTT), or anticoagulant activity (e.g.: anti-Xa activity)], that may be coupled with
291 imaging surrogate endpoints (e.g.: change in thrombus burden, presence/absence of asymptomatic
292 DVT). It is expected that the measurement of the anticoagulant activity (e.g.: anti-Xa assay for direct
293 FXa inhibitors or any other specific assay according to the drug's mechanism of action) is based on
294 tests already validated. As for PK, the influence of intrinsic and extrinsic factors on PD should also be
295 considered. Finally, there is likely to be a necessity to develop special paediatric formulations as
296 appropriate for different age groups, and taking into account the intended route of administration
297 (*Guideline on pharmaceutical development of medicines for paediatric use*
298 *EMA/CHMP/QWP/805880/2012 Rev. 2*). If the product is to be administered orally, the use of a liquid
299 formulation is preferred, as it is easy to swallow and together with the delivered liquid dosing device
300 the formulation ensures a flexible, precise and accurate dosing. The choice for a suspension
301 formulation may also be accepted if appropriately justified (e.g.: poor solubility of the active
302 ingredient/s). Comparable absorption of the new formulation versus other existing formulations of the
303 medicinal product, children's acceptability and measuring devices are to be established. Of equal
304 importance is to develop appropriate paediatric formulations if the product is to be administered
305 parenterally (e.g.: lower concentrations adapted to children, graduated syringes or other
306 administration devices adapted for paediatric use) or by other routes.

307 **6.2. Exploratory Therapeutic studies**

308 Exploratory studies are expected to function as dose finding studies for confirmatory trials and could be
309 placebo controlled where feasible. In addition to selecting a dosing regimen of the experimental drug
310 that is effective and safe, these studies could also provide additional information, e.g. proof of concept,
311 safety, comparability to adults and data to support population selection. The use of placebo could be
312 feasible when there is clinical equipoise about starting/continuing anticoagulation versus not
313 starting/stopping anticoagulation, either in extended prophylaxis after acute VTE, where the exact
314 duration is unknown, in primary prophylaxis when antithrombotic prophylaxis is not well established,
315 or even in the treatment of asymptomatic VTE, if appropriately justified. The use of placebo would be
316 considered unethical in the treatment of symptomatic VTE. It may be possible to derive dose
317 information from adult studies and phase I PK studies in children using exposure response analyses
318 and modelling, but specific dose titration studies may be required to document the safety, PK/PD in
319 children requiring high anticoagulant doses, like those with acute VTE. In phase II trials in children
320 with acute VTE is encouraged to follow a stepwise approach starting with adolescents and older
321 children (6-18 years), followed by younger children (6 months to 6 years) and neonates due to safety
322 reasons. The use of BSA rather than BW adjusted dosing may be adequate in clinical trials in children
323 considering the fact that rapid changes in weight due to altered fluid load and/or nutritional status is
324 frequent in this special population. The use of half the dose in mg/m² found efficacious and safe in
325 adults in a prophylactic indication as an initial dose and subsequent titration until the target range is
326 achieved, is acceptable. Analysis of pre-specified PD biomarkers is recommended. Robust markers
327 (e.g.: anti Xa-activity, *in vivo* thrombin generation) are preferred to less sensitive and unspecific
328 traditional markers of coagulation. The choice will ultimately depend on the drug mechanism of action
329 and on the PD markers identified in the adult population.

330 **6.3. Confirmatory Therapeutic studies**

331 It is recognised that large randomised clinical trials may not be feasible in paediatric VTE to evaluate
332 the benefit risk of all medicinal products intended for use in this clinical condition when the difficulties
333 in performing clinical investigations are taken into account. Therefore, paediatric developments need to
334 build on information on safety and efficacy of the medicinal product from the adult population. There is

335 a need to maximise the information gathered from all other types of studies (including exploratory and
336 PK studies conducted across groups). With the expectation that limited efficacy and safety clinical data
337 will be available at the time of completion of the phase III trial/s, study designs should also focus on
338 the collection of PK/PD data. Such data may also indicate the need for monitoring in this vulnerable
339 population.

340 When discussing the design of confirmatory studies, it is important to distinguish between the initial
341 treatment of VTE (usually 3-6 months), extended treatment (secondary prevention of recurrence) of
342 VTE (once the initial treatment has finished), and primary thromboprophylaxis in high risk children, like
343 those with indwelling CVCs.

344 Use of an appropriate comparator according to the best standard of care (e.g.: LMWH, vitamin K
345 antagonists) will be generally mandatory for comparative clinical trials in the initial treatment of acute
346 VTE in children. In situations where the prophylactic use of anticoagulation is not well established in
347 children, an add-on design to the best standard of care (e.g.: nursing care of indwelling CVCs,
348 mechanical thromboprophylaxis, early mobilisation in children developmentally able to walk, etc) in
349 both the active and placebo group is recommended.

350 **a) Initial treatment of VTE:** It is difficult to endorse a particular sample size in the treatment of
351 acute VTE on the basis of the information currently available. A minimum patient number per age
352 group in the phase III program is necessary to generate efficacy and safety data, which will be
353 generally agreed in the paediatric investigation plan (PIP). The number of children recruited is
354 expected to be low and comparative trials in the treatment of VTE versus standard of care will normally
355 not be focussing on formal hypothesis testing of non-inferiority or superiority due to lack of statistical
356 power, but rather on descriptive analyses. The results can be supported by efficacy and safety data
357 from adults, provided that PK/PD studies in children have identified a proper dose in children to
358 achieve a similar effect on PD endpoints as in adults (see also the start of section 4 about
359 extrapolation). The sponsors are advised to consider analysis methods that capitalise on all available
360 data, for example using statistical modelling (see *CHMP Guideline on clinical trials in small populations:*
361 *CHMP/EWP/83561/2005*).

362 **b) Secondary prevention of VTE:** for secondary prevention, an extension of the study for the initial
363 treatment of VTE (from month 3 until month 6-12) is preferred, but inclusion in a separate study may
364 also be acceptable. Controlled data on a sufficient number of patients at high risk for recurrent VTE,
365 should be presented. If the intended indication is chronic/indefinite use, safety data extending beyond
366 the period of 1 year should be presented. Similar trends in the treatment effect have to be shown
367 across different age subgroups (i.e.: infants, children and adolescents), to support an extension of the
368 indication to the whole paediatric population (see also the start of section 4 about extrapolation).

369 **c) Prevention of VTE in children at risk of VTE, including those with indwelling CVCs:**
370 Currently, there are no medicinal products approved for prevention of VTE in adult patients with CVCs
371 and evidence from clinical trials is scarce and inconsistent. Therefore, extrapolation to children is not
372 possible nowadays (see also the start of section 4 about extrapolation), and proof of concept in
373 children needs to be established. It is difficult to anticipate an appropriate sample size to show
374 superiority versus placebo due to little knowledge on the expected rate of primary events, drop-out
375 rate and the treatment effect versus placebo in this population. The study duration should closely
376 mirror the lifetime of the catheter. On the other hand, from an analysis point of view, in the situation
377 of individually differing observation periods, the investigation of the primary endpoint should not be
378 solely based on incidences. The risk of developing an event will clearly depend on the individual
379 observation period, i.e. the lifetime of the catheter. Therefore, investigation of incidences at fixed time
380 points and also time-to-event analyses will contribute to the establishment of the treatment benefits.

381 The exact wording of the label can only be decided after submission and assessment of the trial
382 outcome data.

383 **7. Evaluation of safety**

384 Safety evaluation in paediatric VTE is expected to be generally similar to adults (i.e.: focused on major
385 and clinically relevant non-major bleeding, as well as in related parameters, like blood tests that may
386 indicate blood loss) [1-3].

387 Additional safety parameters (or endpoints) that are important in children include growth retardation,
388 bone density or delays in neuro-motor and neurocognitive development.

389 **Definitions of acronyms**

390 BSA: body surface area;

391 BW: body weight;

392 CUS: compression ultrasound;

393 CHD: congenital heart disease;

394 CTA: computed tomography angiography;

395 CVC: central venous catheter;

396 DVT: deep vein thrombosis;

397 HC: hormonal contraception;

398 mSv: millisievert;

399 LMWH: low-molecular-weight heparin;

400 MRA: magnetic resonance angiography;

401 PBPK: physiologically-based pharmacokinetic model;

402 PD: pharmacodynamics;

403 PE: pulmonary embolism;

404 PIP: paediatric investigation plan;

405 PK: pharmacokinetics;

406 UFH: unfractionated heparin;

407 VKA: vitamin K antagonist;

408 VPLS: ventilation-perfusion lung scan/scintigraphy.

409 References

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