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Paediatric addendum to CHMP guideline on the clinical investigations of medicinal products for the treatment of pulmonary arterial hypertension

Draft

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27 **Executive summary**

28 This is an addendum to the Guideline on the Clinical Investigations of Medicinal Products for the
29 Treatment of Pulmonary Arterial Hypertension for Adults. It is not meant as a guidance document on
30 its own but rather highlights differences from adult pulmonary arterial hypertension PAH patients and
31 points out paediatric specific issues.

32 **1. Introduction (background)**

33 The most common forms of paediatric PAH are idiopathic Pulmonary Arterial Hypertension (iPAH) and
34 associated Pulmonary Arterial Hypertension (aPAH) (refer to table 1 adult guideline). Left untreated,
35 children with IPAH fare less well than adults. The predicted survival after diagnosis is less than a year
36 compared to 2.8 years in adults.

37 Although the definition of PAH is basically the same in both populations, extrapolation from adults to
38 children is not straightforward for several reasons: 1) The prevalence of the subtypes of PAH is
39 different among both populations e.g the idiopathic form is more prevalent in adults, whilst PAH
40 associated with congenital heart disease is more frequent in children; 2) the anticipated lifespan of
41 children is longer; 3) children may have a more reactive pulmonary circulation which may result in
42 greater vasodilator responsiveness; and 4) despite clinical and pathological studies suggesting
43 increased vasoreactivity in children, before the advent of long-term vasodilator/antiproliferative
44 therapy, the natural history remained significantly worse for children compared to adult patients.

45 The choice of a relevant endpoint to demonstrate efficacy in the paediatric population is also
46 considered problematic.

47 **2. Scope**

48 This guidance document focuses on IPAH and APAH as well as persistent pulmonary hypertension of
49 the new born (PPHN). It explicitly includes APAH due to congenital heart disease [Eisenmenger
50 syndrome, PAH associated with systemic to pulmonary shunts (small, moderate or large defects) and
51 PAH after corrective cardiac surgery].

52 **3. Legal basis**

53 This addendum to the CHMP guideline on Clinical Investigations of Medicinal Products for the
54 Treatment of Pulmonary Arterial Hypertension has to be read in conjunction with the introduction and
55 general principles of the Annex I to Directive 2001/83 as amended .

56 All pertinent elements outlined in current and future EU and ICH guidelines and regulations should also
57 be taken into account especially those on:

- 58 • ICH 11 Clinical Investigation of Medicinal Products in the paediatric population (CHMP/ ICH/ 2711/
59 99)
- 60 • Guideline on clinical trials in small populations (CHMP/ EWP/ 83561/ 2005).
- 61 • Reflection paper on the regulatory guidance for the use of health related quality of life (HrQL)
62 measures in the evaluation of medicinal products.

63 **4. Criteria of efficacy**

64 ***4.1. Idiopathic pulmonary arterial hypertension and associated pulmonary*** 65 ***arterial hypertension***

66 Depending on the proposed indication the investigated primary and secondary endpoints may vary.
67 Choice of the endpoints is also dependent on the age of the recruited children.

68 For children \geq 12 years, the proposed claims and the investigated endpoints generally follow those in
69 the adult guideline i.e the primary endpoints may include time to clinical worsening or exercise testing,
70 in particular the 6-MWT. If this age group is included in the adult clinical program, adequate
71 representation should be ensured to allow for any specific claims and results should be presented
72 separately. A PIP waiver for this age group could accordingly be considered.

73 In younger age groups both the choice of the primary endpoint and recruitment are recognized
74 problems. For children < 12 years, measures of exercise capacity are problematic to assess. In the age
75 group 7-11 years, the use of relevant exercise tests, in particular 6-MWT needs further validation. In
76 children ≤ 6 years, adequate performance of exercise testing may not even be possible. Time to clinical
77 worsening can be measured, in line with the adult guideline, but especially in this age population
78 recruitment problems will hamper its assessment as a primary efficacy endpoint.
79 Therefore, a flexible approach in children < 12 years should be considered on a case by case basis.
80 When efficacy of a drug has been demonstrated in adults based on exercise testing or clinical
81 endpoints, extrapolation to younger age groups can be acceptable provided that the results of other
82 feasible endpoints show comparable results in both age groups. This applies particularly to invasive
83 haemodynamic measurements and also to those obtained by non-invasive techniques such as
84 echocardiography. Effect on quality of life (QoL) can be measured acknowledging that indirect
85 assessment by involving the child's parents/carers is inevitable for the younger patient groups. Weight
86 and length gain are also considered relevant indicators of response and well being.

87 **4.2. Persistent pulmonary hypertension of the new born (PPHN)**

88 Persistent pulmonary hypertension of the newborn is a clinical syndrome characterised by failure of the
89 elevated foetal pulmonary vascular resistance to regress after birth. PPHN is multifactorial in origin,
90 although commonly associated with congenital and acquired hypoxic lung disease and congenital heart
91 defects. Idiopathic forms are rare. Severe forms are associated with significant morbidity and mortality.
92 Limited data are available regarding relevant endpoints in this field.

93 The following endpoints are suggested; the first two endpoints are considered of higher clinical
94 relevance and less disputable value:

- 95 • all-cause mortality;
- 96 • need for extracorporeal membrane oxygenation (based on standardized criteria e.g.
97 oxygenation index).
- 98 • need for additional drug treatment targeting PAH;
- 99 • time on NO;
- 100 • time to weaning from mechanical ventilation;
- 101 • ventilation index;
- 102 • time on supplemental oxygen;
- 103 • duration of ultrasound-detectable right-left shunting (hours or days).

104 **5. Patients**

105 **5.1. Selection**

106 Paediatric age groups should be adequately represented depending on the proposed claim.

107 **5.2. Background treatment**

108 Stabilisation on background medications before recruitment in a study may not always be practicable
109 in paediatric trials as children often present to the hospital with acute deterioration. The rate of
110 deterioration can be fast. Therefore, the use of rescue medication should be set out in the protocol (e.
111 g. intravenous epoprostenol in IPAH). The use of rescue medications should be centrally adjudicated.

112 **6. Strategy – Design**

113 **6.1. Human pharmacology studies**

114 The development of special paediatric formulations is encouraged.

115 **6.1.1. IPAH and APAH**

116 Adult data should be extrapolated where possible, but adequate definition of the associated condition,
117 in particular the type of congenital heart disease is important. Additional drug-drug interaction studies
118 might be necessary in the paediatric population, particularly interactions with warfarin.

119 **6.1.2. PPHN**

120 Separate studies are needed to study the mechanism of action of the drug for this specific indication.

121 **6.2. Exploratory therapeutic studies**

122 These studies should determine the appropriate dose for the confirmatory trials. Placebo-controlled
123 studies as suggested in the adult guideline are not always acceptable in children. Correlation of doses
124 with haemodynamic response might be possible. Plasma level measurements should be performed in
125 order to establish a PK/ PD relation.

126 **6.3. Confirmatory therapeutic studies**

127 **6.3.1. IPAH and APAH**

128 Protocols should clearly state whether paediatric patients will be included in the adult program.
129 Difficulties in performing exclusive paediatric studies are recognised since children show considerable
130 variability in clinical outcome partly due to the heterogeneity of the disease aetiology and partly due to
131 the rapid changes in the course of the untreated disease. Recruitment problems may hamper the
132 implementation of randomised, controlled trials. Due to the difficulty in performing such studies, it is
133 recommended to seek advice regarding the study design.

134 Patients should be stratified into IPAH and APAH. Further stratification into subgroups depends on the
135 proposed indication. Duration largely depends on the chosen endpoint. Longer-term studies of at least
136 6 month duration are encouraged especially if the chosen endpoints measure clinical endpoints. If the
137 primary endpoint does not include mortality, this has to be additionally investigated in an open-label
138 extension to exclude any negative safety signal. The extension studies should include all the patients
139 regardless of their reason for discontinuation. Close monitoring and the possibility of modification of
140 the treatment should be clearly set out in the protocol.

141 **6.3.2. PPHN**

142 As previously mentioned, PPHN has to be studied separately. The ethics of performing of placebo-
143 controlled trials when nitric oxide (NO) is the standard therapy is questioned. Accordingly, mainly add-
144 on trials in patients failing treatment with NO should be considered.

145 **7. Safety aspects**

146 Long-term issues in relation to growth and sexual maturity are of particular importance.

147 **Definitions**

148 Refer to section 1.

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