



# EVOLVING ROLES, SAME GOALS:

#### The Changing Landscape of Pain Management

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> PLAINTIFF TRIAL EXHIBIT **P-22531\_00001**

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- Objectives:
  - Outline some of the options for pain management, focusing on the role of opioids
    - Although efficacious, opioids are subject to misuse, abuse, and diversion
  - Consider the role of healthcare providers (HCPs), patients, and government as part of a multifaceted approach to address these issues
  - Discuss how industry may play a role in augmenting a multifaceted approach through the development of abuse-deterrent opioid formulations
    - Review FDA draft guidance on their development







# Introduction

- Chronic pain constitutes a medical need in the United States<sup>1,2</sup>
- Opioids represent an important part of the chronic pain armamentarium<sup>3</sup>
- A large and devastating problem of opioid abuse, diversion, and misuse exists and must be addressed<sup>4</sup>
- A multifaceted approach is needed to ensure that pain management is effectively provided to patients who need it while addressing these concerns
  - Strategies to deal with opioid abuse include educational and regulatory initiatives as well as the development of abuse-deterrent formulations
- The benefits of effective treatment must be weighed against the consequences of inadequate analgesia<sup>5</sup>



1. Institute of Medicine. Relieving pain in America: a blueprint for transforming prevention, care, education, and research. Washington, DC: The National Academies Press; 2011. 2. McCarberg BH, et al. *Am J Ther.* 2008;15(4):312-320. 3. Chou R, et al. *J Pain.* 2009;10(2):113-130.e22. 4. Substance Abuse and Mental Health Services Administration. http://www.samhsa.gov/data/NSDUH 2012SummNatFindDetTables/NationalFindings/NSDUHresults2012.pdf. Updated October 2, 2013. Accessed March 31, 2014. 5. American Pain Society. Pain: Current Understanding of Assessment, Management, and Treatments. http://www.americanpainsociety.org/uploads/pdfs/npc/npc.pdf. Accessed August 10, 2014.

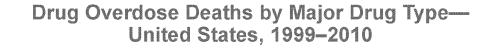


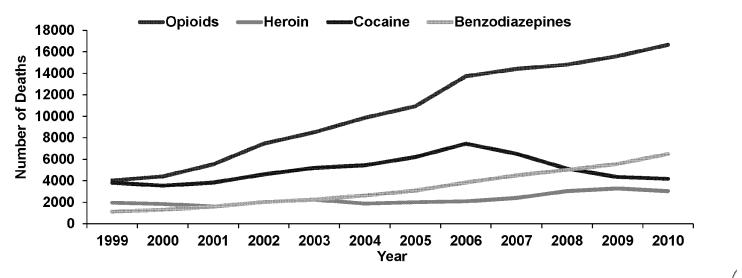
### **Opioids: An Important Analgesic Option**

United States, 1991–2013 105 116 126 138 142 149 155 163 174 184 **196 202 210 219 217** 250 207 Total Prescriptions (millions) 200 150 97 94 87 100 85 82 79 76 50 0 1991 1992 1993 1994 1995 1996 1997 1998 1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010 2011 2012 2013 Year PAIN Department of Health and Human Services/National Institutes of Health. Prescription Opioid and Heroin Abuse. Testimony by Nora Volkow, MD, Director, National Institute on Drug 57=170 Abuse. http://democrats.energycommerce.house.gov/sites/default/files/documents/Testimony-Nora-Volkow-OI-Prescription-Drug-and-Heroin-Abuse-2014-4-29.pdf. Accessed August 2, MATTERS 2014.

**Opioid Prescriptions Dispensed by Retail Pharmacies**—

#### Unintended Consequences of Abuse





Centers for Disease Control. Primary Care and Public Health Initiative. Prescription Drug Abuse and Overdose: Public Health Perspective. October 24, 2012. http://www.cdc.gov/primarycare/materials/opoidabuse/. Accessed August 4, 2014. PAIN

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### What Is the Scope of Intended Abuse/Addiction?

- Data derived from an evidence-based review of chronic pain patients with nonmalignant pain receiving chronic opioid analgesic therapy
- 67 studies that evaluated
  - Abuse/addiction rate
     (24 studies, n=2507)
  - Aberrant drug-related behaviors (ADRBs) (17 studies, n=2466)
  - Urine test results
     (5 studies, n=1965)
- 25x lower rate of abuse/addiction in patients without a prior history (0.19% vs 5.0%)



Percent of patients being treated with chronic opioid therapy with high likelihood of abuse/addiction



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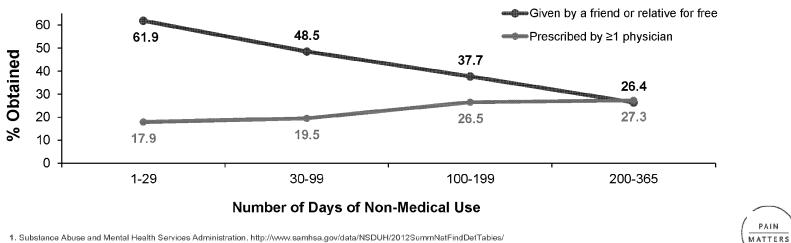
Fishbain DA, et al. Pain Med. 2008;9(4):444-459.

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#### Source of Opioid Diversion with Increasing Non-Medical Use<sup>1,2</sup>

Although the most common initial source of opioids for non-medical use is through friends ۲ and family,<sup>1</sup> the primary source changes with increased non-medical use<sup>2</sup>



Most Common Source of Opioid by Frequency of Non-Medical Use

1. Substance Abuse and Mental Health Services Administration. http://www.samhsa.gov/data/NSDUH/2012SummNatFindDetTables/ NationalFindings/NSDUHresults2012.pdf. Updated October 2, 2013. Accessed March 31, 2014. 2. Jones CM, et al. JAMA Intern Med. 2014;174(5):802-803. Slide 8



#### Approaches to Mitigate Opioid Abuse

- Education<sup>1</sup>
  - Clinician education on: appropriate prescribing, screening, monitoring, and patient management
  - Patient education on appropriate use, storage, and disposal
- Guidance and tools<sup>1-4</sup>
  - Prescription Drug Monitoring Programs (PDMPs)
  - Controlled substance scheduling
  - Risk Evaluation and Mitigation Strategies (REMS)
- Developing abuse-deterrent formulations<sup>1,5</sup>
  - Abuse-deterrent draft guidance from the FDA

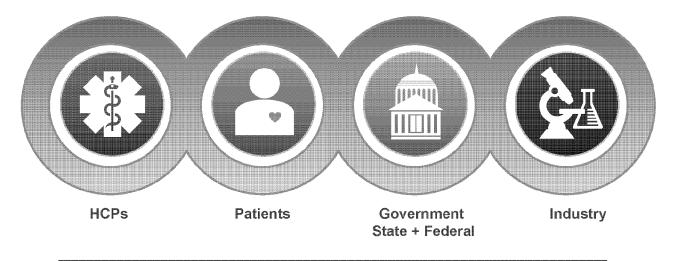


1. U.S. Food and Drug Administration. http://www.fda.gov/Drugs/Drugs/Drugs/Drugs/afety/InformationbyDrugClass/ucm337852.htm#prescriber\_education. Accessed July 28, 2014. 2. U.S. Department of Justice. http://www.fda.gov/NewsEvents/Newsroom/ PressAnnouncements/ucm367726.htm. Accessed July 19, 2014. 4. Federal Register: The Daily Journal of the United States Government. Schedules of Controlled Substances: Rescheduling of Hydrocodone Combination Products From Schedule III. http://www.gpo.gov/fdsys/pkg/FR-2014-08-22/pdf/2014-19922.pdf. Accessed August 25, 2014. 5. U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/DrugsGuidanceeCompliance RegulatoryInformation/Guidances/UCM334743.pdf. Accessed July 20, 2014.



# **Stakeholders Addressing Opioid Abuse**

A collaborative approach is necessary



A multifaceted approach to mitigating risk is required to ensure safe and effective pain management

(PAIN MATTERS)

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# HCP Approaches to Mitigate Opioid Abuse

#### How often are these done in "low-risk" patients?

#### **Universal Precautions**

- Establishing diagnosis
- Treatment agreement
- Pain assessments
- Review of diagnosis
- Documentation

#### Screening

#### Various Instruments including:

- Opioid Risk Tool (ORT)
- Current Opioid Misuse Measure (COMM)
- Revised Screener and Opioid Assessment for Patients with Pain (SOAPP-R)
- Pain Assessment & Documentation Tool (PADT)

#### **Adherence Monitoring**

- Prescription drug monitoring programs (PDMPs)
- Random drug screens
- Pill counts

# HCPs are at the forefront of pain management and employ multiple methods to assess opioid risk in individual patients



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Sehgal N, et al. Pain Physician. 2012;15(3 suppl):ES67-ES92.





1. Arnstein P, St. Marie B. Managing chronic pain with opioids: a call for change. December 2010. http://www.nphealthcarefoundation.org/programs. Accessed July 20, 2014. 2. Broglio K, Cole BE. *Nurse Practitioner*. 2014:39(6):30-37.



### What is a PDMP?

#### **Prescription Drug Monitoring Program**

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- Definition
  - Statewide electronic database
  - Collects data on substances dispensed in state
  - Housed by designated state agency (eg, regulatory, administrative, law enforcement)
  - Accessible to authorized personnel

#### Benefits

- Supports legitimate access to controlled substances
- Identifies and deters drug abuse and diversion
- Facilitates identification and treatment of those addicted to prescription drugs
- Provides use and abuse data to inform public health efforts
- Educates individuals on use, abuse, and diversion



U.S. Department of Justice. http://www.deadiversion.usdoj.gov/faq/rx\_monitor.htm. Accessed July 18, 2014.

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# PDMPs State by State<sup>1</sup>

- PDMPs vary by state based on<sup>2</sup>:
  - Prescriptions tracked
  - Which prescribers must report
  - Lag time in reporting
  - Access to data
  - PDMPs may modify prescribing behavior, reduce "doctor shopping," and speed investigations



The full benefit of PDMPs will not be reached until all states implement data sharing and interoperability between each other<sup>2</sup>



States with enacted PDMP legislation, but

program not yet operational

States with legislation pending

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1. NAMSDL. http://www.namsdl.org/library/16666FCC-65BE-F4BB-A2BBAD44E1BC7031. Accessed July 18, 2014.

2. Finklea K, et al. Congressional Research Service. March 24, 2014. fas.org/sgp/crs/misc/R42593.pdf. Accessed August 7, 2014.

#### Medicaid "Lock-In" Program

#### 1 Patient, 1 PCP, 1 Pharmacy

- The Law
  - Federal law allows Medicaid to restrict patients who overutilize Medicaid services to designated providers
- The Application
  - High-risk opioid users can be restricted ("locked in") to receive treatment and prescriptions from a designated PCP and/or pharmacy
- The Purpose
  - Single provider can coordinate care
  - Reduces doctor/pharmacy shopping
  - Limits drug diversion
  - Reduces healthcare utilization and pharmacy costs
- Future
  - Lock-in programs might be adopted by other governmental payers and possibly private insurers as well

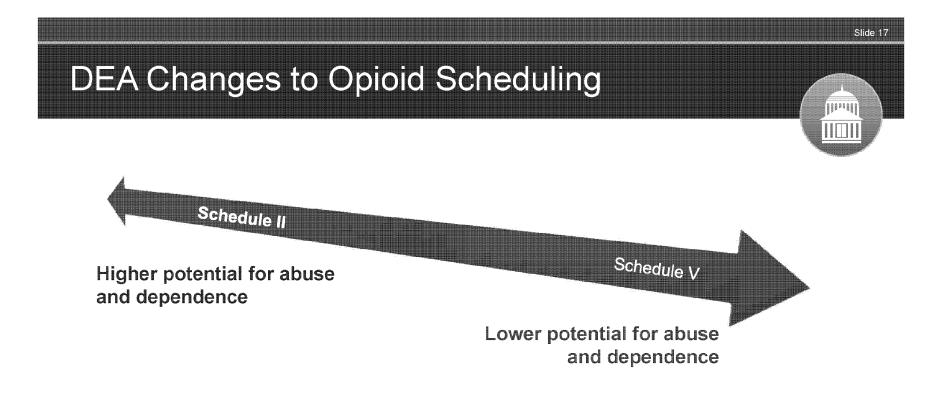


#### PCP=primary care physician.

Roberts AW, Skinner AC. J Manag Care Pharm. 2014;20(5):439c-446c.



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Drug Enforcement Administration. http://www.justice.gov/dea/druginfo/ds.shtml. Accessed July 19, 2014.

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\*Required for REMS specific to transmucosal immediate-release fentanyl (TIRF) drugs but not extended-release/long-acting (ER/LA) opioids REMS.1.2



1. U.S. Food and Drug Administration. http://www.fda.gov/downloads/drugs/drugs/afety/postmarketdrugsafety/informationforpatientsandproviders/ucm311290.pdf. Accessed July 19, 2014. 2. U.S. Food and Drug Administration. http://www.fda.gov/Drugs/DrugSafety/InformationbyDrugClass/ucm284717.htm. Accessed July 19, 2014.



# A Multifaceted Approach to Addressing Opioid Abuse

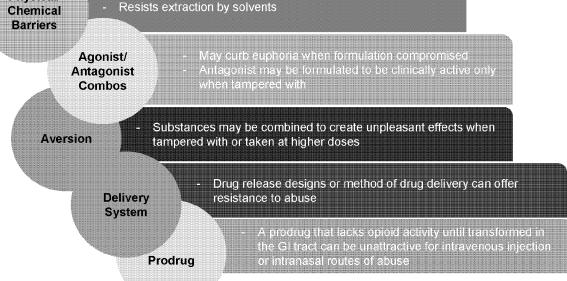
- Key stakeholders in addressing opioid abuse include HCPs, patients, and government
- HCP strategies for mitigating opioid abuse include universal precautions, screening for drug abuse and abuse risk, urine testing, and adherence monitoring
- Patients should be educated on the methods and importance of safe use, safe storage, and safe disposal of opioids
- The federal and state governments have developed and are developing programs aimed at making opioid diversion and abuse more difficult and less likely, including:
  - PDMPs
  - REMS
- Industry may also have a role by developing abuse-deterrent opioids







# Various Approaches to Abuse Deterrent Opioids





U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf. Accessed July 20, 2014.



# FDA Draft Guidance on Abuse-Deterrent Opioids

# Provides guidance on studies that should be conducted:

- To demonstrate that a formulation has abusedeterrent properties
- How those studies will be evaluated
- What labeling claims may be proposed based on the results of those studies

Guidance for Industry Abuse-Deterrent Opioids — Evaluation and Labeling	
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U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf. Accessed July 20, 2014.



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#### FDA Draft Guidance for Abuse-Deterrent Opioids

FDA guidance document outlines:

- Categories of studies to evaluate abuse-deterrent properties
- Designs and goals of such studies
- Examples of labeling claims that could be proposed based on the results of these studies

#### **Categories of Studies**





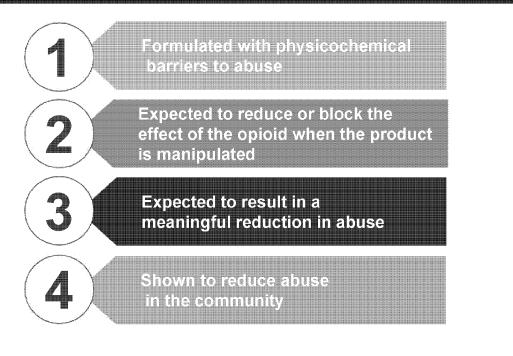
\*Also called human abuse liability (HAL) studies.

U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf. Accessed July 20, 2014.



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#### Four Tiers of Label Claims





U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf. Accessed July 20, 2014.



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# FDA Draft Guidance for Laboratory Manipulation and Extraction Studies

**Mechanical Manipulation Studies** 

- Focus on particle size, which may influence opioid extractability
- · Ordinary tools/utensils should be employed in testing; eg, spoons, cutters, and coffee grinders



• Effect of heat and cold on mechanical manipulation

#### **Solubility Studies**

• Determine ease of **solubility** with various solvents (eg, water, vinegar, ethanol, isopropanol, acetone, mineral spirits)

#### **Route-Specific Evaluation**

- **Snorting:** particle size distribution
- Smoking: vaporization temperature
- Injection: opioid concentration in small injection volume and viscosity of injection fluid



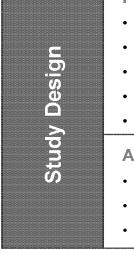
Study Design

U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft), January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf, Accessed July 20, 2014.



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#### FDA Draft Guidance for PK Studies



**Pharmacokinetic Parameters** 

- Maximum plasma concentration (C<sub>max</sub>)
- Time to reach  $C_{max}$  ( $T_{max}$ )
- Area under the curve (AUC)
- Relevant partial AUC (eg, AUC<sub>0-30mins</sub> or AUC<sub>0-2hrs</sub>)
- Terminal elimination half-life

Areas of Special Interest Comparing Intact and Manipulated Formulations

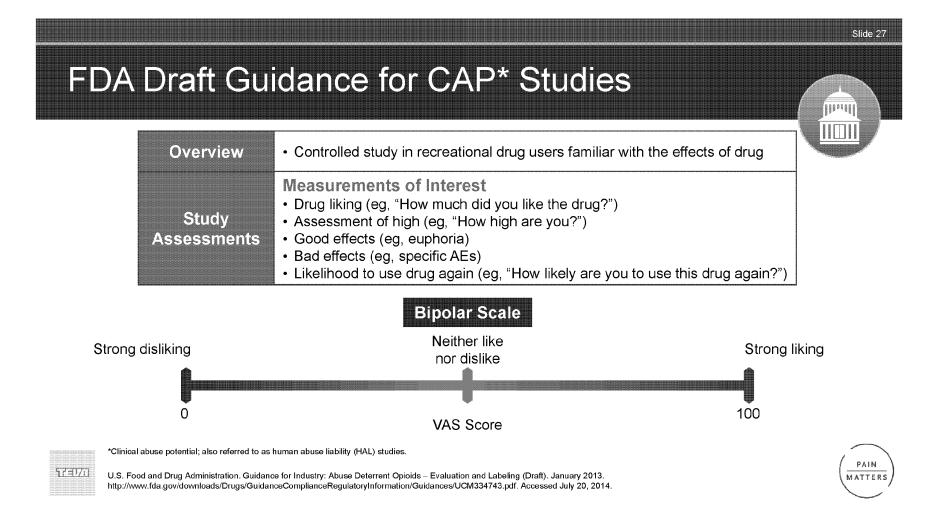
- · Rate of rise of drug concentration (thought to contribute to abuse potential)
- · Determination if food affects systemic exposure to formulation
- Recording of incidence and nature of adverse events (AEs)

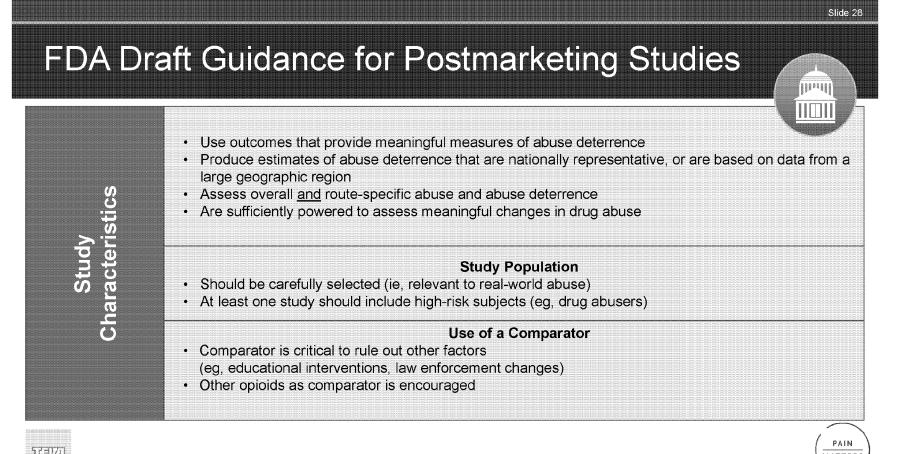
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U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf. Accessed July 20, 2014.



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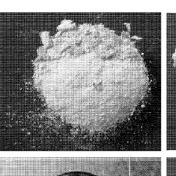


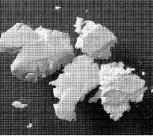
U.S. Food and Drug Administration. Guidance for Industry: Abuse Deterrent Opioids – Evaluation and Labeling (Draft). January 2013. http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/ Guidances/UCM334743.pdf. Accessed July 20, 2014. MATTERS

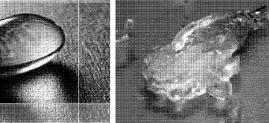
#### Abuse-Deterrent Formulations: Crush-Resistant Pills and Capsules

	make crushir abuse
How	<ul> <li>In this form, or challenging to chew, inject</li> </ul>
abuse- deterrent	<ul> <li>Crush-resista available</li> </ul>
is it?	Gelatin capsi in 2011
	<ul> <li>Labeling difference</li> <li>formulations</li> </ul>

- Recent formulations seek to make crushing pills unusable for abuse
- In this form, drug may be challenging to break, snort, chew, inject
- Crush-resistant pill currently available
- Gelatin capsule rejected by FDA in 2011
- Labeling differentiates between formulations that *prevent* abuse and those that make it *more difficult*









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#### Abuse-Deterrent Formulations: Agonist-Antagonist

· Capsule containing many pellets of

Sequestered core contains an opioid

No notable antagonist effect if taken

orally or if pellets are sprinkled

If crushed or chewed, antagonist is released, causing withdrawal

opioid

antagonist

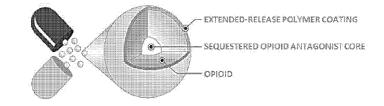
on food

symptoms



Blocking

the Effect





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# The Continuing Evolution of Abuse-Deterrent Opioids

- Numerous approaches to deter abuse have been, and are being, developed to decrease the likelihood of opioid misuse, abuse, and diversion
- The FDA has provided industry with draft guidance for the development and testing of new abuse-deterrent formulations
- The draft guidance also includes levels of claims manufacturers may propose in labeling to describe the potential abuse-deterrent properties of a product based on study results





#### Conclusions



- Pain is a major reason patients seek medical care, and opioids remain an important treatment option for adequate analgesia
- Addressing issues surrounding opioid misuse, abuse, and diversion requires a multifaceted approach that encompasses HCPs, patients, government, and industry
- While no abuse-deterrent opioid formulations prevent all types of abuse, they may be designed to provide an additional barrier to opioid abuse
  - Education, guidance, and tools continue to be the most important impediments to abuse
  - Continued development and availability of abuse-deterrent opioids may further diminish the likelihood of abuse

