


Stanford University SPARK  
(Translational Research Program)  
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**Regulatory and Scientific Challenges  
for Drug-Drug Interactions**

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**Drug Interactions**  
- One Survey -



- National survey of 3005 community-residing older adults (>57 YO) in US
- 80% of individuals takes  $\geq 1$  medical product (prescription, OTC, supplement)
- 50% takes at least 5 medical products
- 30% takes at least 5 prescription drugs
- 1/25 at risk of major drug-drug interactions

Gato DM, et al, JAMA 2008; 300:2867-2878.


**Drug Interactions**  
Potential Major Medication Interactions by Age and Gender

Medication Interaction <sup>a</sup>	Interactions, Weighted No.						Potential Interaction Effect
	Age 57-84 y (n = 1048)		Age 65-74 y (n = 1084)		Age 75-84 y (n = 878)		
	Men (n = 508)	Women (n = 540)	Men (n = 543)	Women (n = 541)	Men (n = 377)	Women (n = 501)	
Prescription-prescription							
Albuterol-atenolol	0	1	1	0	1	1	5 Decreased effectiveness
Albuterol-metoprolol	0	1	1	1	2	1	6 Decreased effectiveness
Warfarin-rosuvastatin	5	2	4	3	7	3	25 Increased risk of bleeding/thrombosis
Clopidogrel-warfarin	0	0	0	1	1	1	3 Increased risk of bleeding

Gato DM, et al, JAMA 2008; 300:2867-2878.

- Do we need an updated list such as this one? ("Drug Interaction Checks" enabled as part of the EHR implementation- HealthIT.Gov)
- Which databases? (e.g., the above used micromedex)
- When are we concerned about complex interactions (multiple drugs)?
- Critical in the mechanistic understanding of these PD- and PK-based interactions and the ability to extrapolate to untested conditions

**Many Factors Affect Drug Exposure/Response**



It is critical to evaluate how these factors affect drug exposure/response

Ultimate goal → Optimal dosing for patients with these individual factors

**Dose Adjustment (1)**  
**Impact of Intrinsic Factors**

Figure 2. Impact of intrinsic factors on Vilazodone PK

Population Description	PK	Fold Change and 90% CI	Recommendation
Age	Older	1.0	No dose adjustment (40mg)
Gender	Female	1.0	No dose adjustment
Renal Impairment	Mild	1.0	No dose adjustment
	Moderate	1.0	No dose adjustment
	Severe	1.0	No dose adjustment
Hepatic Impairment	Mild	1.0	No dose adjustment
	Moderate	1.0	No dose adjustment
	Severe	1.0	No dose adjustment

The data shows for elderly subjects (≥65 years) relative to subjects (20-55 years).  
The data shows for female subjects relative to male subjects.  
The data shows for renal and hepatic impairment are relative to subjects with normal renal and hepatic functions, respectively.

Dose adjusted from the population dose(s) for individual groups of patients with specific intrinsic factors

April 2014 labeling: [http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2014/022567s011b1.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2014/022567s011b1.pdf)

**Dose Adjustment (2)**  
**Impact of Extrinsic Factors**

7.5 Potential for Other Drugs to Affect Vilazodone

Figure 1. Impact of other drugs on Vilazodone PK

Change due to	PK	Fold Change and 90% CI	Recommendation
Ethanol	Cmax AUC	1.0	No dose adjustment (40mg)
CYP1A4 inhibitors	Cmax AUC	1.0	Maximum dose 20mg
CYP1A4 inducers	Cmax AUC	1.0	Up to 3-fold increase
Proton Pump Inhibitors	Cmax AUC	1.0	No dose adjustment

What **extrinsic factors** (drugs, herbal products, diet, smoking, and alcohol use) influence dose-exposure and/or – response?

What is the impact of any differences in exposure on response?

Dose adjusted from the population dose(s) for individual groups of patients with specific extrinsic factors

April 2014 labeling: [http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2014/022567s011b1.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2014/022567s011b1.pdf)

**Guidance for Industry**

**Drug Interaction Studies — Study Design, Data Analysis, Implications for Dosing, and Labeling Recommendations**

**DRAFT GUIDANCE**

This guidance document is being distributed for comment purposes only.

Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit comments to the Division of Dockets Management (HFA-101), Food and Drug Administration, 5630 Fishers Lane, rm. 1091, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document contact (CDER) Shiew-Mei Huang, 301-796-1541, or Lin Zhang, 301-796-1610.

U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)

February 2015  
Clinical Pharmacology

<http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm064982.htm> 7 S-M Huang

**What is new?**

- Transporters
- Decision trees
- Model-based prediction (mechanistic approaches)
- Phase 2 enzymes
- Therapeutic proteins
- Metabolites

**Received public comments**

- Reviewed specific comments and revising
- Split into two documents
- Collaborative work ongoing

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**Drug Development and Drug Interactions**

Overview

Background Information

Tables of Substrates, Inhibitors and Inducers

CYP Enzymes

- In vitro
- In vivo
- Examples of In Vivo Substrate, Inhibitor, and Inducer for Specific CYP Enzymes
- Classification of Inhibitors
- Classification of Substrates

P-gp Transporters

Major Human Transporters

Possible Models for Decision-Making

CYP-Based Drug-Drug Interaction Studies

P-gp-Based Drug-Drug Interaction Studies (updated 3/25/2006)

<http://www.fda.gov/Drugs/DevelopmentApprovalProcess/DevelopmentResources/DrugInteractionsLabeling/ucm080499.htm> 8 S-M Huang

**Classifications**

CYP Enzymes	Strong Inhibitors	Moderate inhibitors	Weak inhibitors
	≥ 5-fold increase in AUC	≥ 2 but <5-fold increase in AUC	≥ 1.25 but <2-fold increase in AUC
CYP Enzymes	Strong Inducers	Moderate Inducers	Weak Inducers
	≥ 80% decrease in AUC	50- 80% decrease in AUC	20-50% decrease in AUC

<http://www.fda.gov/Drugs/DevelopmentApprovalProcess/DevelopmentResources/DrugInteractionsLabeling/ucm080499.htm>  
U Washington drug interaction database  
<http://www.druginteractioninfo.org/>

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**INDIANA UNIVERSITY**

SCHOOL OF MEDICINE | DEPARTMENT OF MEDICINE

**DIVISION OF CLINICAL PHARMACOLOGY**

**P450 Drug Interaction Table**

**SUBSTRATES**

1A2	2D6	2C8	2C9	2C19	2D6	2E1	3A4, 5, 7
acetaminophen <sup>1</sup> caffeine <sup>1</sup> citalopram <sup>1</sup> clozapine <sup>1</sup> diazepam <sup>1</sup> doxycycline <sup>1</sup> gabapentin <sup>1</sup> metoprolol <sup>1</sup> nifedipine <sup>1</sup> phenytoin <sup>1</sup> propofol <sup>1</sup> sildenafil <sup>1</sup> theophylline <sup>1</sup> warfarin <sup>1</sup> zidovudine <sup>1</sup>	amiodarone <sup>2</sup> cyclosporine <sup>2</sup> diazepam <sup>2</sup> digoxin <sup>2</sup> doxycycline <sup>2</sup> gabapentin <sup>2</sup> metoprolol <sup>2</sup> nifedipine <sup>2</sup> phenytoin <sup>2</sup> propofol <sup>2</sup> sildenafil <sup>2</sup> theophylline <sup>2</sup> warfarin <sup>2</sup> zidovudine <sup>2</sup>	amiodarone <sup>3</sup> cyclosporine <sup>3</sup> diazepam <sup>3</sup> digoxin <sup>3</sup> doxycycline <sup>3</sup> gabapentin <sup>3</sup> metoprolol <sup>3</sup> nifedipine <sup>3</sup> phenytoin <sup>3</sup> propofol <sup>3</sup> sildenafil <sup>3</sup> theophylline <sup>3</sup> warfarin <sup>3</sup> zidovudine <sup>3</sup>	amiodarone <sup>4</sup> cyclosporine <sup>4</sup> diazepam <sup>4</sup> digoxin <sup>4</sup> doxycycline <sup>4</sup> gabapentin <sup>4</sup> metoprolol <sup>4</sup> nifedipine <sup>4</sup> phenytoin <sup>4</sup> propofol <sup>4</sup> sildenafil <sup>4</sup> theophylline <sup>4</sup> warfarin <sup>4</sup> zidovudine <sup>4</sup>	amiodarone <sup>5</sup> cyclosporine <sup>5</sup> diazepam <sup>5</sup> digoxin <sup>5</sup> doxycycline <sup>5</sup> gabapentin <sup>5</sup> metoprolol <sup>5</sup> nifedipine <sup>5</sup> phenytoin <sup>5</sup> propofol <sup>5</sup> sildenafil <sup>5</sup> theophylline <sup>5</sup> warfarin <sup>5</sup> zidovudine <sup>5</sup>	amiodarone <sup>6</sup> cyclosporine <sup>6</sup> diazepam <sup>6</sup> digoxin <sup>6</sup> doxycycline <sup>6</sup> gabapentin <sup>6</sup> metoprolol <sup>6</sup> nifedipine <sup>6</sup> phenytoin <sup>6</sup> propofol <sup>6</sup> sildenafil <sup>6</sup> theophylline <sup>6</sup> warfarin <sup>6</sup> zidovudine <sup>6</sup>	amiodarone <sup>7</sup> cyclosporine <sup>7</sup> diazepam <sup>7</sup> digoxin <sup>7</sup> doxycycline <sup>7</sup> gabapentin <sup>7</sup> metoprolol <sup>7</sup> nifedipine <sup>7</sup> phenytoin <sup>7</sup> propofol <sup>7</sup> sildenafil <sup>7</sup> theophylline <sup>7</sup> warfarin <sup>7</sup> zidovudine <sup>7</sup>	amiodarone <sup>8</sup> cyclosporine <sup>8</sup> diazepam <sup>8</sup> digoxin <sup>8</sup> doxycycline <sup>8</sup> gabapentin <sup>8</sup> metoprolol <sup>8</sup> nifedipine <sup>8</sup> phenytoin <sup>8</sup> propofol <sup>8</sup> sildenafil <sup>8</sup> theophylline <sup>8</sup> warfarin <sup>8</sup> zidovudine <sup>8</sup>

<http://medicine.iupui.edu/clinpharm/ddis/main-table/> (last accessed, March 2015) 10 S-M Huang

**Dasatinib & CYP3A**

**2 DOSAGE AND ADMINISTRATION**

**2.1 Dose Modification**

**Concomitant Strong CYP3A4 Inhibitors:** CYP3A4 inhibitors (e.g., ketoconazole, itraconazole, clarithromycin, atazanavir, indinavir, nefazodone, nelfinavir, ritonavir, saquinavir, telithromycin, and voriconazole) may increase dasatinib plasma concentrations. Grapefruit juice may also increase plasma concentrations of dasatinib and should be avoided.

Selection of an alternate concomitant medication with no or minimal enzyme inhibition potential, if possible, is recommended. If SPRYCEL must be administered with a strong CYP3A4 inhibitor, a dose decrease should be considered. Based on pharmacokinetic studies, a dose decrease to 20 mg daily should be considered for patients taking SPRYCEL 100 mg daily. For patients taking SPRYCEL 140 mg daily, a dose decrease to 40 mg daily should be considered.

Drugs at the FDA (Sprycel, "DOSAGE and ADMINISTRATION") 2015 Labeling  
[http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2015/021986s01s0171b1ed.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2015/021986s01s0171b1ed.pdf)  
<http://www.accessdata.fda.gov/scripts/cder/DrugsatFDA/>

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**Simeprevir & CYP3A**

**DRUG INTERACTIONS**

- Co-administration of amiodarone with sofosbuvir in combination with OLYSIO may result in serious symptomatic bradycardia. (5.1)
- Co-administration of OLYSIO with drugs that are moderate or strong inducers or inhibitors of CYP3A may significantly affect the plasma concentrations of simeprevir. The potential for drug-drug interactions must be considered prior to and during treatment. (5.7, 7, 12.3)

→ Therefore co-administration with moderate or strong inducers or inhibitors of CYP3A is not recommended (5.7, 7)

Drugs at the FDA (OLYSIO: HIGHLIGHTS; 2015 Labeling)  
[http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2015/205123s008b1.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2015/205123s008b1.pdf)

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## Clinical Pharmacology & Therapeutics

### Increasing Information on Transporter

**Red:** Critical transporter proteins to evaluate prospectively  
**Green:** Additional ones to evaluate prospectively  
**Yellow:** Retrospective evaluation  
**Blue:** Additional transporters

*Giacomini and Huang, Clin Pharmacol Ther July 2013 (special issue)*

**HUMAN DRUG TRANSPORTERS**

Modified from: Giacomini, Huang, Tweedie et al, Nat Rev Drug Disc March 2010; Gilesczynski et al, Clin Pharmacol Ther November 2012; Hillgren et al, Clin Pharmacol Ther July 2013

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## Simeprevir & P-gp

*In vitro*, simeprevir is a substrate for P-gp, MRP2, BCRP, OATP1B1/3 and OATP2B1; simeprevir inhibits the uptake transporters OATP1B1/3 and NTC and the efflux transporters P-gp/MDR1, MRP2 and BSEP. The inhibitory effects of simeprevir on the bilirubin transporters OATP1B1/3 and MRP2 likely contribute to clinical observations of elevated bilirubin [see Adverse Reactions (6.1)].

### 7 DRUG INTERACTIONS

#### 7.1 Potential for OLYSIO to Affect Other Drugs

#### 7.2 Potential for Other Drugs to Affect OLYSIO

#### 7.3 Established and Other Potentially Significant Drug Interactions

Digoxin*	↑ digoxin	Concomitant use of OLYSIO with digoxin resulted in increased concentrations of digoxin due to inhibition of P-gp by simeprevir. <u>Routine therapeutic drug monitoring</u> of digoxin concentrations is acceptable.
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*Drugs at the FDA (OLYSIO: 7.3 Drug Interactions; 2015 Labeling*  
[http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2015/205123s008lbl.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2015/205123s008lbl.pdf)

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## Simeprevir & OATP1B1

*In vitro*, simeprevir is a substrate for P-gp, MRP2, BCRP, OATP1B1/3 and OATP2B1; simeprevir inhibits the uptake transporters OATP1B1/3 and NTC and the efflux transporters P-gp/MDR1, MRP2 and BSEP. The inhibitory effects of simeprevir on the bilirubin transporters OATP1B1/3 and MRP2 likely contribute to clinical observations of elevated bilirubin [see Adverse Reactions (6.1)].

### HMG CO-A Reductase Inhibitors

Rosuvastatin	↑ rosuvastatin	Concomitant use of OLYSIO with rosuvastatin resulted in increased plasma concentrations of rosuvastatin due to inhibition of OATP1B1 by simeprevir. Initiate rosuvastatin therapy with 5 mg once daily. The rosuvastatin dose should not exceed <u>10 mg</u> daily when co-administered with OLYSIO.
Atorvastatin*	↑ atorvastatin	Concomitant use of OLYSIO with atorvastatin resulted in increased plasma concentrations of atorvastatin due to inhibition of OATP1B1 and/or CYP3A4 by simeprevir. Use the lowest necessary dose of atorvastatin, but do not exceed a daily dose of <u>40 mg</u> when co-administering with OLYSIO.

*Drugs at the FDA (OLYSIO: 12.3 Clinical Pharmacology & 7.3 Drug Interactions; 2015 Labeling*  
[http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2015/205123s008lbl.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2015/205123s008lbl.pdf)

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## Development of a Drug Transporter Database: UCSF-FDA Transportal

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 \*Office of Clinical Pharmacology, Office of Translational Sciences, Center for Drug Evaluation and Research, Food and Drug Administration, Silver Spring, MD

**ABSTRACT**  
 Drug transporters are key determinants of absorption, distribution and elimination of many drugs and appear to play important roles in therapeutic and adverse drug effects. Though a large body of data on molecular and drug transporter interactions, there are few databases that support drug developers, regulatory agencies and academic scientists about transporters important in drug action and disposition. We have selected 37 drug transporters from the HUGO Gene Nomenclature Committee (HGNC) and Drug Bank (2012) transporter nomenclature and compiled primary literature and clinical data to build a public drug transporter database to serve as a central resource for information needed by the scientific community on important drug transporter interactions.

**DATABASE SCREENSHOTS**  
 Drug Transporters in Selected Organs & Direction of Transport  
 Blood-Brain Barrier, Kidney, Liver, Small Intestine, Placenta  
 Expression Data  
 Kidney - RNA Sequencing  
 Kidney - Quantitative PCR  
 REFERENCES  
<http://bbs.ucsf.edu/fdatransporter/>

*Morrissey KM, Wen CC, Johns SJ, Zhang L, Huang SM, Giacomini KM, "The UCSF-FDA Transportal: A Public Drug Transporter Database", Clin Pharmacol Ther, Nov 2012*

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## Regulatory Guidance/Guideline on Drug Interactions

- U.S. Food and Drug Administration (FDA)'s Draft Guidance for Industry: Drug Interaction Studies—Study Design, Data Analysis, Implications for Dosing, and Labeling Recommendations (2012)  
<http://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM292362.pdf>
- European Medicines Agency (EMA) Guideline on the Investigation of Drug Interactions (effective Jan 2013)  
[http://www.ema.europa.eu/docs/en\\_GB/document\\_library/Scientific\\_guideline/2012/07/WC500129606.pdf](http://www.ema.europa.eu/docs/en_GB/document_library/Scientific_guideline/2012/07/WC500129606.pdf)
- Pharmaceuticals Medical Devices Agency (PMDA) Draft Guideline on Drug Interactions (2013)  
<http://search.e-gov.go.jp/servlet/Public?CLASSNAME=PCMMSTDETAIL&id=495130206>

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## Mechanisms of Drug Interactions

Pharmaceutical  
 Dosage form interactions  
 Pharmacokinetic  
 Alterations in  
 Absorption, Distribution, Metabolism, Excretion  
 Transporters  
 Phase I enzymes (mainly CYP450)  
 Phase II enzymes  
 Pharmacodynamic

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## Major PK Drug Interactions Mechanisms

Inhibition  
or  
Induction  
  
of  
  
*Metabolizing Enzymes and/or Transporters*

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## Clinical implications of inhibition and induction of drug metabolizing enzymes or transporters

**Perpetrator (Inhibitor or Inducer)**  
**Drug 2**

**Victim (Substrate)**  
**Drug 1**

**Metabolizing enzyme or transporter**

**Drug 1 (Parent)**

**Concern**

Exposure (AUC or $C_{max}$ )	
Induction	Inhibition
↓	↑
<b>EFFICACY</b>	<b>SAFETY</b>

AUC: Area under the curve plasma concentration-time profile  
 $C_{max}$ : Maximum plasma concentration

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## Drugs are metabolized by a variety of enzymes

- Approximately 75% of all drug metabolism in humans is mediated by CYP (or P450) enzymes (Phase I enzyme)
- Of the more than 50 CYP enzymes
  - CYP (1A2, 2B6, 2C8, 2C9, 2C19, 2D6, 3A4) account for >95% of xenobiotic metabolism
  - CYP3A is the major CYP, ~50% of drugs were metabolized by CYP3A

*Williams et al. Drug Metab Dispos, 2004; Guengerich. Chem Res Toxicol, 2008*

UGT: UDP-Glucuronosyltransferase

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## Transporters

- Transporters are transmembrane proteins that are inserted in cell membranes to translocate substances across the membrane

- More than 400 transporters are identified
  - ~30 Contribute to the efficacy and safety of drugs
- Two super families
  - ABC** Transporters (~50 families) (ATP-binding cassette)
    - e.g., P-glycoprotein (P-gp, MDR1)
  - SLC** Transporters (~350 families) (Organic Solute Carrier Transporters)
    - e.g., Organic anion transporting polypeptides (OATPs)

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## Transporters of Clinical Importance

**Red: Critical transporter proteins to evaluate prospectively**  
**Green: additional one to evaluate prospectively**  
**Yellow: retrospective evaluation**

*Zamek-Gliszczynski et al. Clin Pharmacol Ther November 2012*

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## Drug Interaction Potential Evaluation

**Other drug's effect on NME:**

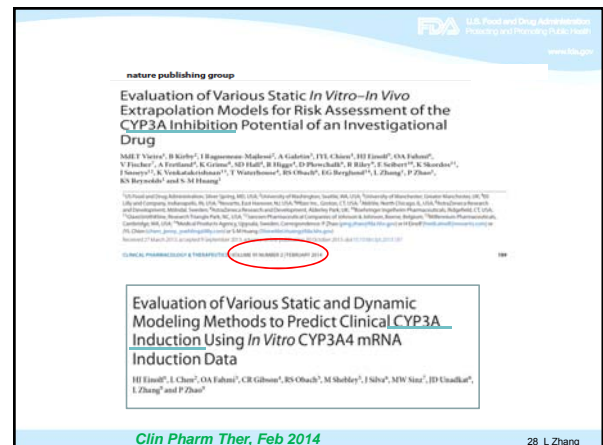
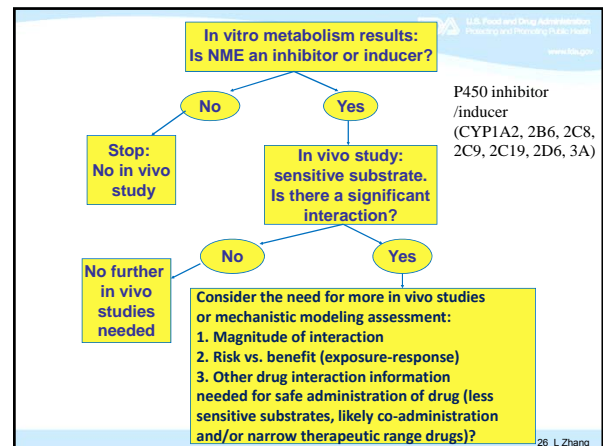
- Whether an NME is a substrate for
  - CYP1A2, 2B6, 2C8, 2C9, 2C19, 2D6, 3A
  - P-gp, BCRP, OATP1B1, OATP1B3, OCT2, OAT1, OAT3
  - MATEs**


**NME's effect on other drug:**

- Whether an NME is an inhibitor for
  - CYP1A2, 2B6, 2C8, 2C9, 2C19, 2D6, 3A and P-gp
  - P-gp, BCRP, OATP1B1, OATP1B3, OCT2, OAT1, OAT3
  - MATEs**
- Whether an NME is an inducer for
  - CYP1A2, 2B6, 2C8, 2C9, 2C19, 3A
  - P-gp (evaluate with CYP3A)

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- 

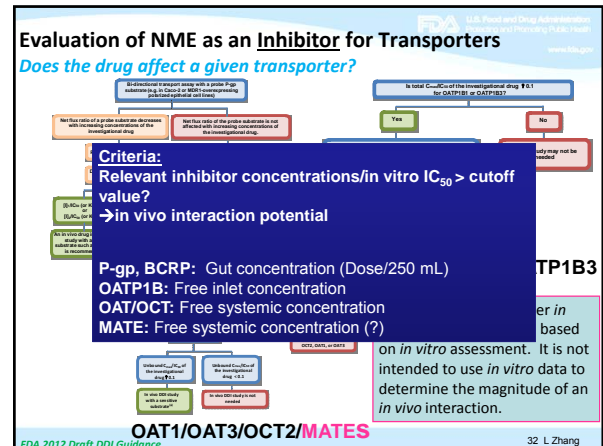
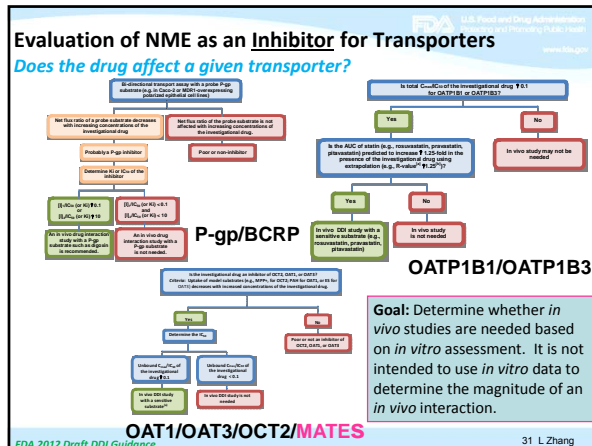
U.S. Food and Drug Administration  
Protecting and Promoting the Public Health

www.fda.gov

## NME as an Inhibitor

### *Does the drug affect a given transporter?*

  - Inhibitors can be substrates or non-substrates for a given transporter.
  - The need to study DDI depends on whether drugs are likely co-administered with known substrates of major human transporters.
  - Other factors to consider: indications, and whether the NME may affect other pathways.



### Recommendations related to transporters

- Recommended sponsors to evaluate major transporters as described in the ITC paper
- Continuing dialog with industry, academia, other regulatory agencies
- Consulting and collaborating with experts in the field (ITC; IQC and academia, CYP inhibition and induction workgroups as an example; sabbatical scientists)
- FDA OCP Transporter Scientific Interest Group continuing research to define/refine *in vitro* criteria in determining the need to conduct *in vivo* studies

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### In Vitro Methodologies

- In vitro* assessments are critical to help determine the clearance mechanism and DDI potential.
- "Best Practice" of *in vitro* assay methodology is needed to ensure quality of *in vitro* assessments (e.g., reliable, reproducible and validated).
- The sources of the variability need to be understood, e.g.,
  - Different laboratories
  - Different *in vitro* cell systems
  - Different substrate/inhibitor
- The processes need to be standardized in each laboratory.
  - Each laboratory may develop criteria internally with known positive and negative controls ("calibration")

Need best practices and standardized approaches

Brouwer KL, et al. Clin Pharm Ther. July 2013.

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### Challenges and Gaps between In Vitro and In Vivo --Basic Models for Transporters

Transporter	Example	Result
P-gp	Etravirine or Maraviroc / Digoxin	False positive → Concomitant induction?
P-gp	Talinolol / Digoxin	False negative prediction
OATP1B	Gemfibrozil / Pitavastatin	False negative → Gemfibrozil glucuronide also inhibits OATP1B
OATP1B	Teriflunomide / Rosuvastatin	False negative if only consider OATP1B → BCRP inhibition also involved.
OCT2	Dolutegravir / Metformin	False negative using one $IC_{50}$ reported (~20 fold difference from two sources) → non-specific binding?

**Considerations:**

- Substrate dependent inhibition
- Uncertainty about intracellular concentrations
- Non-specific binding
- Multiple processes (absorption/distribution/excretion)
- Multiple transporters involved
- Transporters-Enzymes Interplay
- Metabolite as inhibitor
- Mechanistic discrepancy

Courtesy: X. Yang

Zhang L, et al. Xenobiotica (2008); Agarwal S, et al. J Clin Pharmacol (2013); Lepist EI, et al. Kidney Int. (2014); Zong J, et al. J Int AIDS Soc (2014); TIVICAY Prescribing Information

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### FDA Model-Based Framework --Mechanistic consideration of individual pathways

Investigational Drug as a Perpetrator (Inhibitor or Inducer)

- Basic
- Mechanistic, static
- Mechanistic, dynamic (including PBPK)

→ Need to consider all mechanisms (enzyme and transporter) to understand the clearance pathway and to be able to describe PK (and PD) variability

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**Complexity of Transporter DDI**

- Associated with both drug ADME and DDI potential
  - PK of substrate and interacting drug
  - DDI mechanism(s) of interacting drug
- At all levels of physiology
  - Organ/tissue level ( $\geq 1$  transporter, in  $\geq 1$  organ)
  - Cell level (differential expression, uptake and efflux,  $\geq 1$  cell type)
  - Subcellular system
- Enzyme-transporter-(permeability) interplay

Need knowledge integration and mechanistic modeling of local as well as whole body kinetic events

Zhao P, AAPS 2012 37 L Zhang

**Physiologically-based Pharmacokinetics Modeling (PBPK)**

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**Drug Development..**

**Progressive Reduction of Uncertainty**

Janet Woodcock, MD, CDER Director  
FDA PBPK Workshop, March 2014

<http://www.fda.gov/drugs/newsevents/ucm387698.htm> 39 S-M Huang

**Applications of Physiologically Based Pharmacokinetic (PBPK) Modeling and Simulation During Regulatory Review**

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**A. Intrinsic/extrinsic Factors**

**B. PBPK Model components**

**Predict, Learn, Confirm** → **Apply**

Clin Pharmacol Ther, 2011

**Regulatory Submissions with PBPK Data**

**Cummulative as of 2012 (n=33)**

**Cummulative as of 2013 (n=84)**

Huang et al, J Pharm Sci, 2013

Pan et al, ASCPT 2014

- Increased use of PBPK by drug developers
- Majority of the cases were related to DDI (~60%)

P Zhao, FDA PBPK Workshop March 2014; <http://www.fda.gov/drugs/newsevents/ucm387698.htm>; 41 S-M Huang

**PBPK & Drug Interactions**

**Example: Ibrutinib**

PBPK-Simulated and observed C<sub>max</sub> and AUC ratios (mean and 95% confidence interval)

Observed DDI Verification

Prediction

Ketoconazole (Strong inhibitor)

Erythromycin (moderate inhibitor)

Diltiazem (moderate inhibitor)

Fluvoxamine (weak inhibitor)

Elavirenz (Moderate inducer)

Rifampin (Strong inducer)

[http://www.accessdata.fda.gov/drugsatfda\\_docs/nda/2013/205552Orig1s000ClinPharmR.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/nda/2013/205552Orig1s000ClinPharmR.pdf)

P Zhao, FDA PBPK Workshop March 2014 42 S-M Huang

### Ibrutinib Labeling

Section 12.3: "Simulations...suggested that moderate CYP3A inhibitors (diltiazem and erythromycin) may increase the AUC of ibrutinib 6 to 9-fold in fasted condition;...a moderate CYP3A inducer (efavirenz) may decrease the AUC of ibrutinib up to 3-fold"

Section 2.4: "...strong CYP3A inhibitors which would be taken chronically...is not recommended. For short-term use (treatment for 7 days or less) of strong CYP3A inhibitors (e.g., antifungals and antibiotics) consider interrupting IMBRUVICA therapy until the CYP3A inhibitor is no longer needed..."

Reduce IMBRUVICA dose to 140 mg if a moderate CYP3A inhibitor must be used...Patients taking concomitant strong or moderate CYP3A inhibitors should be monitored more closely for signs of IMBRUVICA toxicity."

And more in Section 7...

[http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2013/205552s000lbl.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2013/205552s000lbl.pdf)

P Zhao, FDA PBPK Workshop March 2014

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### Eliglustat and CYP2D6

#### HIGHLIGHTS OF PRESCRIBING INFORMATION

##### INDICATIONS AND USAGE

CERDELGA is a glucosylceramide synthase inhibitor indicated for the long-term treatment of adult patients with Gaucher disease type 1 who are CYP2D6 extensive metabolizers (EMs), intermediate metabolizers (IMs), or poor metabolizers (PMs) as detected by an FDA-cleared test. (1)

##### Limitations of Use:

- CYP2D6 ultra-rapid metabolizers may not achieve adequate concentrations of CERDELGA to achieve a therapeutic effect (1)
- A specific dosage cannot be recommended for CYP2D6 indeterminate metabolizers (1)

##### DOSAGE AND ADMINISTRATION

- Select patients using an FDA-cleared test for determining CYP2D6 genotype (2.1)
- CYP2D6 EMs or IMs: 84 mg orally twice daily (2.2)
- CYP2D6 PMs: 84 mg orally once daily (2.2)

##### DRUG INTERACTIONS

- CYP2D6 IMs and PMs taking moderate CYP3A inhibitors: not recommended (7.1)
- CYP2D6 PMs taking weak CYP3A inhibitors: not recommended (7.1)
- CYP2D6 EMs and IMs taking strong or moderate CYP2D6 inhibitors and CYP2D6 EMs taking strong or moderate CYP3A inhibitors: reduce the dosage to 84 mg once daily (2.2, 7.1)

CERDELGA labeling: [http://www.accessdata.fda.gov/drugsatfda\\_docs/label/2014/205494Orig1s000lbl.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2014/205494Orig1s000lbl.pdf) 44 S-M Huang

### Confidence, Limitation and Challenges of PBPK in DDI Prediction

Application	Level of confidence	Limitations and challenges
DDI prediction	Moderate to high	Accurate in vitro estimation of fraction metabolized by P450, especially when non-P450 enzyme involved. The i.v. clearance and mass balance data for victim (substrate) not readily available at early stages of drug development. Uncertainty in CYP phenotyping and measured in vitro inhibitor constant (K <sub>i</sub> ).
Involving time-dependent CYP	Low to moderate	In addition to caveats above, there is a general over-prediction of in vivo DDI from in vitro data.
Involving combined reversible, time-dependent inhibition, and induction of CYPs	Low	Difficult to evaluate mechanisms when multiple processes are involved because of limited clinical data.
Involving modulation of non-CYP pathways	Low to moderate	Lack of prospective evaluation.
Involving apical active transport	Moderate	Not all in vitro assays provide appropriate inhibition constants.
Involving basolateral active transport	Low	As above. Predicting intracellular inhibitor concentrations from uptake and efflux transport activity is challenging.

HM Jones et al, Clin Pharmacol Ther March 2015

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#### EDITORIAL

### Physiologically Based Pharmacokinetics Is Impacting Drug Development and Regulatory Decision Making

M Rowland<sup>1,2</sup>, L.J. Lesko<sup>3</sup> and A. Rostami-Hodjegan<sup>1,2,4</sup>

#### PERSPECTIVE

### Application of Physiologically Based Pharmacokinetic (PBPK) Modeling to Support Dose Selection: Report of an FDA Public Workshop on PBPK

C. Wagner<sup>1</sup>, P. Zhao<sup>1</sup>, Y. Pan<sup>2</sup>, V. Hsu<sup>1</sup>, J. Grillo<sup>1</sup>, S-M Huang<sup>1</sup> and V. Srinivas<sup>1</sup>

#### ORIGINAL ARTICLE

### Physiologically Based Models in Regulatory Submissions: Output From the ABPI/MHRA Forum on Physiologically Based Modeling and Simulation

T. Sheperd<sup>1</sup>, G. Scott<sup>2</sup>, S. Cole<sup>1</sup>, A. Nordmark<sup>2</sup> and F. Bouzon<sup>1</sup>

Clin Pharmacol Ther-Pharmacometrics Sys Pharmacol 2015

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### Summary

- Drug interactions is one critical factor in determining the best drug or dose for individual patients
- Recent development of molecular biology has improved understanding of the mechanisms behind drug-drug, drug-food, drug-supplement interactions
- Careful evaluation of drug interaction potential during drug development provides key labeling information for patients
- FDA and other regulatory agencies have provided guidance on the evaluation of drug interactions
- Continual collaborations among stake holders are key to useful information for patients

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### References

- FDA Drug Development and Drug Interactions Website;  
<http://www.fda.gov/Drugs/DevelopmentApprovalProcess/DevelopmentResources/DrugInteractionsLabeling/ucm080499.htm>
- Genomics at the FDA:  
<http://www.fda.gov/Drugs/ScienceResearch/ResearchAreas/Pharmacogenetics/default.htm>
- Drugs@FDA:  
<http://www.accessdata.fda.gov/scripts/cder/drugsatfda/>
- Clinical Pharmacology Guidance for industry:  
<http://www.fda.gov/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/ucm064982.htm>
- For Consumers:  
<http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm212747.htm>

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