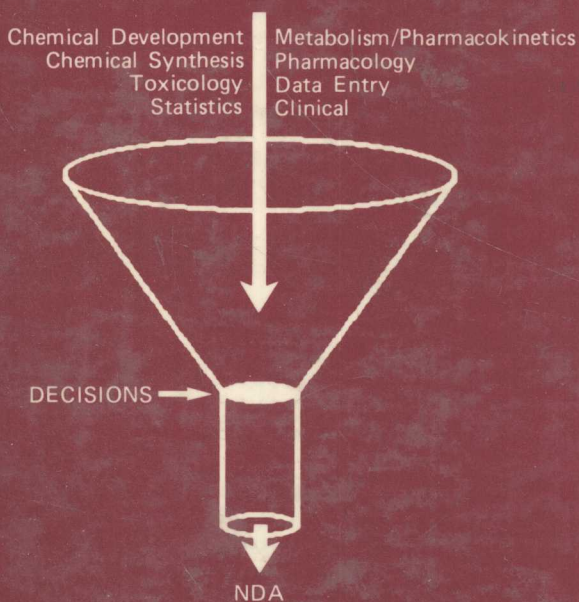


Clinical Drug Trials and Tribulations



edited by
Allen E. Cato

Clinical Drug Trials and Tribulations

edited by

Allen E. Cato

Cato Research Ltd.
Chapel Hill, North Carolina



Y2000501

Marcel Dekker, Inc. • New York and Basel

Library of Congress Cataloging-in-Publication Data

Clinical drug trials and tribulations

(Drugs and the pharmaceutical sciences ; v. 34)

Includes index.

1. Drugs--Testing. 2. Clinical trials. I. Cato, Allen E.

[DNLM: 1. Clinical trials. 2. Drug therapy. W1DR893B v. 34 /

QV 771 C6405]

RM301.C52 1988

615.5'8'0724--dc19

DNLM/DLC

88-20210

ISBN 0-8247-7854-5

Copyright © 1988 by MARCEL DEKKER, INC. All Rights Reserved

Neither this book nor any part may be reproduced or transmitted in any form or by any means, electronic or mechanical, including photocopying, microfilming, and recording, or by any information storage and retrieval system, without permission in writing from the publisher.

MARCEL DEKKER, INC.

270 Madison Avenue, New York, New York 10016

Current printing (last digit):

10 9 8 7 6 5 4 3 2 1

PRINTED IN THE UNITED STATES OF AMERICA

***Clinical Drug Trials
and Tribulations***

DRUGS AND THE PHARMACEUTICAL SCIENCES

A Series of Textbooks and Monographs

Edited by

James Swarbrick

School of Pharmacy

University of North Carolina

Chapel Hill, North Carolina

- Volume 1. **PHARMACOKINETICS**, *Milo Gibaldi and Donald Perrier*
(out of print)
- Volume 2. **GOOD MANUFACTURING PRACTICES FOR PHARMACEUTICALS: A PLAN FOR TOTAL QUALITY CONTROL**, *Sidney H. Willig, Murray M. Tuckerman, and William S. Hitchings IV* (out of print)
- Volume 3. **MICROENCAPSULATION**, *edited by J. R. Nixon*
- Volume 4. **DRUG METABOLISM: CHEMICAL AND BIOCHEMICAL ASPECTS**, *Bernard Testa and Peter Jenner*
- Volume 5. **NEW DRUGS: DISCOVERY AND DEVELOPMENT**,
edited by Alan A. Rubin
- Volume 6. **SUSTAINED AND CONTROLLED RELEASE DRUG DELIVERY SYSTEMS**, *edited by Joseph R. Robinson*
- Volume 7. **MODERN PHARMACEUTICS**, *edited by Gilbert S. Banker and Christopher T. Rhodes*
- Volume 8. **PRESCRIPTION DRUGS IN SHORT SUPPLY: CASE HISTORIES**, *Michael A. Schwartz*
- Volume 9. **ACTIVATED CHARCOAL: ANTIDOTAL AND OTHER MEDICAL USES**, *David O. Cooney*
- Volume 10. **CONCEPTS IN DRUG METABOLISM** (in two parts), *edited by Peter Jenner and Bernard Testa*
- Volume 11. **PHARMACEUTICAL ANALYSIS: MODERN METHODS**
(in two parts), *edited by James W. Munson*
- Volume 12. **TECHNIQUES OF SOLUBILIZATION OF DRUGS**,
edited by Samuel H. Yalkowsky

- Volume 13. ORPHAN DRUGS, *edited by Fred E. Karch*
- Volume 14. NOVEL DRUG DELIVERY SYSTEMS: FUNDAMENTALS, DEVELOPMENTAL CONCEPTS, BIOMEDICAL ASSESSMENTS, *edited by Yie W. Chien*
- Volume 15. PHARMACOKINETICS, Second Edition, Revised and Expanded, *Milo Gibaldi and Donald Perrier*
- Volume 16. GOOD MANUFACTURING PRACTICES FOR PHARMACEUTICALS: A PLAN FOR TOTAL QUALITY CONTROL, Second Edition, Revised and Expanded, *Sidney H. Willig, Murray M. Tuckerman, and William S. Hitchings IV*
- Volume 17. FORMULATION OF VETERINARY DOSAGE FORMS, *edited by Jack Blodinger*
- Volume 18. DERMATOLOGICAL FORMULATIONS: PERCUTANEOUS ABSORPTION, *Brian W. Barry*
- Volume 19. THE CLINICAL RESEARCH PROCESS IN THE PHARMACEUTICAL INDUSTRY, *edited by Gary M. Matoren*
- Volume 20. MICROENCAPSULATION AND RELATED DRUG PROCESSES, *Patrick B. Deasy*
- Volume 21. DRUGS AND NUTRIENTS: THE INTERACTIVE EFFECTS, *edited by Daphne A. Roe and T. Colin Campbell*
- Volume 22. BIOTECHNOLOGY OF INDUSTRIAL ANTIBIOTICS, *Erick J. Vandamme*
- Volume 23. PHARMACEUTICAL PROCESS VALIDATION, *edited by Bernard T. Loftus and Robert A. Nash*
- Volume 24. ANTICANCER AND INTERFERON AGENTS: SYNTHESIS AND PROPERTIES, *edited by Raphael M. Ottenbrite and George B. Butler*
- Volume 25. PHARMACEUTICAL STATISTICS: PRACTICAL AND CLINICAL APPLICATIONS, *Sanford Bolton*
- Volume 26. DRUG DYNAMICS FOR ANALYTICAL, CLINICAL, AND BIOLOGICAL CHEMISTS, *Benjamin J. Gudzinowicz, Burrows T. Younkin, Jr., and Michael J. Gudzinowicz*

- Volume 27. MODERN ANALYSIS OF ANTIBIOTICS, *edited by Adorjan Aszalos*
- Volume 28. SOLUBILITY AND RELATED PROPERTIES, *Kenneth C. James*
- Volume 29. CONTROLLED DRUG DELIVERY: FUNDAMENTALS AND APPLICATIONS, Second Edition, Revised and Expanded, *edited by Joseph R. Robinson and Vincent H. L. Lee*
- Volume 30. NEW DRUG APPROVAL PROCESS: CLINICAL AND REGULATORY MANAGEMENT, *edited by Richard A. Guarino*
- Volume 31. TRANSDERMAL CONTROLLED SYSTEMIC MEDICATIONS, *edited by Yie W. Chien*
- Volume 32. DRUG DELIVERY DEVICES: FUNDAMENTALS AND APPLICATIONS, *edited by Praveen Tyle*
- Volume 33. PHARMACOKINETICS: REGULATORY · INDUSTRIAL · ACADEMIC PERSPECTIVES, *edited by Peter G. Welling and Francis L. S. Tse*
- Volume 34. CLINICAL DRUG TRIALS AND TRIBULATIONS, *edited by Allen E. Cato*
- Volume 35. TRANSDERMAL DELIVERY SYSTEMS: DEVELOPMENTAL ISSUES AND RESEARCH INITIATIVES, *edited by Jonathan Hadgraft and Richard H. Guy*
- Volume 36. AQUEOUS POLYMERIC COATINGS FOR PHARMACEUTICAL DOSAGE FORMS, *edited by James W. McGinity*

Additional Volumes in Preparation



To my wife, Adrian, and my three sons, Jo, Mike, and Dan, who tolerated my absence from our family life when I was out of town in the fascinating pursuit of clinical drug development.

The book is also dedicated to all patients, past, present, and future, who volunteer for participation in clinical drug trials. Without them no drug could ever be shown to be safe or efficacious. These patients are the silent heroes behind every advancement in drug therapy.

Preface

For those individuals fortunate enough to be engaged in it, clinical drug development is a fascinating endeavor. Within the scope of drug development is all the sleuthing of a mystery novel, all the politics of a race for political office, all the power of Wall Street dollars, all of the intrigue of scientific mystery, and all the pathos of a Greek tragedy.

This book is not a "how-to" book. There are already many of those in existence. Rather, this book is meant to address the "whys" -i.e., why certain decisions were made, and what were the consequences of those decisions. In the process, the intriguing tribulations of clinical drug trials emerge.

The number of difficult decisions that must be made during the course of clinical drug development seems endless. In 17 years in the business, I am still faced daily with new tribulations and challenges I have never before encountered. The one rule of clinical drug development must be that things never turn out as designed or expected.

One other aspect of clinical drug development involves teamwork. Despite the significant contribution to alleviate the ills that befall mankind, individual stars seldom emerge from the clinical development team. The tribulations faced in the microcosm of the project team operating within the pharmaceutical industry are evident throughout many of the chapters in this book. In a more macrocosmic sense,

the team becomes industry working with academia and the regulatory authorities. There are highly dedicated individuals working together in each of these areas.

As with any book, several people were instrumental in its production. Linda Cook (who, by marrying during the production of this book, acquired the much more difficult-to-spell name Cocchetto) provided important advice and encouragement throughout. Robert Sutton during the early stages and Paul Stang later on provided the glue that held together all the authors and the editor. My everlasting thanks to all of them. They could write about their own tribulations on the production of a book. Lastly, my thanks to all the authors who delivered chapters . . . it was an imposition on their time and energy, but I believe the result in this case is greater than the sum of the parts.

Allen E. Cato

Contributors

SAMUEL K. ACKERMAN Xoma Corporation, Berkeley, California

OLAV M. BAKKE Laboratorios Almirall S. A., Barcelona, Spain

G. H. BESSELAAR G. H. Besselaar Associates, Princeton Forrestal
Center, Princeton, New Jersey

ROCCO L. BRUNELLE Lilly Research Laboratories, Lilly Corporate
Center, Indianapolis, Indiana

NANCY B. CAPLAN Burroughs Wellcome Company, Research Triangle
Park, North Carolina

ALLEN E. CATO Cato Research Ltd., Chapel Hill, North Carolina

GILLES CLOUTIER Burroughs Wellcome Company, Research Triangle
Park, North Carolina

DAVID M. COCCHETTO Glaxo Inc., Research Triangle Park, North
Carolina and Duke University Medical Center, Durham, North
Carolina

LINDA COCCHETTO Glaxo Inc., Research Triangle Park, North
Carolina

DALE H. COWAN Oncology Unit, Marymount Hospital, Garfield Heights, Ohio

GREGORY G. ENAS Lilly Research Laboratories, Lilly Corporate Center, Indianapolis, Indiana

GERALD A. FAICH Office of Epidemiology and Biostatistics, Food and Drug Administration, Rockville, Maryland

MARION J. FINKEL Research and Development, Berlex Laboratories, Inc., Cedar Knolls, New Jersey

RICHARD J. FLECK Burroughs Wellcome Company, Research Triangle Park, North Carolina

HARRY A. GUESS Merck Sharp & Dohme Research Laboratories, West Point, Pennsylvania

D. C. HEITZ G. H. Besselaar Associates, Princeton Forrestal Center Princeton, New Jersey

JOSEPH K. INSCOE Division of Surgical-Dental Drug Products, Food and Drug Administration, Rockville, Maryland

NELSON S. IREY Department of Environmental and Drug-Induced Pathology, Armed Forces Institute of Pathology, Washington, DC

J. W. KESTERSON Pharmaceutical Products Division, Abbott Laboratories, North Chicago, Illinois

JOEL N. KURITSKY Office of Epidemiology and Biostatistics, Food and Drug Administration, Rockville, Maryland

ALLEN A. LAI Burroughs Wellcome Company, Research Triangle Park, North Carolina

JUDITH KRAMER LITTLEJOHN* Peachtree Internal Medicine Clinic, P. A. Murphy, North Carolina

BRUCE L. MILLER Department of Philosophy, Michigan State University, East Lansing, Michigan

LOUIS A. MORRIS Division of Drug Advertising and Labeling, Food and Drug Administration, Rockville, Maryland

*Present affiliation: Burroughs Wellcome Company, Research Triangle Park, North Carolina

RONALD V. NARDI Glaxo Inc., Research Triangle Park, North
Carolina

PETER H. RHEINSTEIN Office of Drug Standards, Food and Drug
Administration, Rockville, Maryland

PATRICK J. SIMPSON Lilly Research Laboratories, Lilly Corporate
Center, Indianapolis, Indiana

PAUL STANG Glaxo Inc., Research Triangle Park, North Carolina

EDWARD C. SUTTON Burlington, North Carolina

ROBERT P. SUTTON Burroughs Wellcome Company, Research Triangle
Park, North Carolina

W. LEIGH THOMPSON Lilly Research Laboratories, Lilly Corporate
Center, Indianapolis, Indiana

RANDY L. WALKER Lilly Research Laboratories, Lilly Corporate Center,
Indianapolis, Indiana

Contents

| | |
|---|----|
| <i>Preface</i> | v |
| <i>Contributors</i> | xi |
| 1 The Challenge of the Clinical Development of Drugs <i>Allen E. Cato</i> | 1 |
| 2 Preclinical Drug Discovery and Development <i>J. W. Kesterson</i> | 17 |
| 3 Overall Clinical Drug Development Planning <i>Gilles Cloutier and Allen E. Cato</i> | 51 |
| 4 Preclinical Considerations in IND Safety Decisions: A Pharmacologist's Viewpoint <i>Joseph K. Inscoe</i> | 67 |
| 5 Clinical Pharmacokinetics and the Pharmacist's Role in Drug Development and Evaluation <i>Allen A. Lai, Richard J. Fleck, and Nancy B. Caplan</i> | 79 |

| | | |
|----|---|-----|
| 6 | Single-Event Adverse Drug Reactions: Tribulations in Ascribing Causality | 99 |
| | <i>Nelson S. Irey</i> | |
| 7 | Routine Laboratory Tests in Clinical Trials | 119 |
| | <i>W. Leigh Thompson, Rocco L. Brunelle, Gregory G. Enas, Patrick J. Simpson, and Randy L. Walker</i> | |
| 8 | Biological Products in Phase I and Phase II Clinical Trials | 173 |
| | <i>Samuel K. Ackerman</i> | |
| 9 | Phase II Clinical Trials: Should They Be Controlled? Or Skipped? | 193 |
| | <i>W. Leigh Thompson</i> | |
| 10 | How to Deal with a Sudden, Unexpected Death in Clinical Studies | 207 |
| | <i>Allen E. Cato and Linda Cocchetto</i> | |
| 11 | The Compassionate Use of Drugs | 215 |
| | <i>Allen E. Cato and Paul Stang</i> | |
| 12 | Orphan Drug Development: David and Goliath | 227 |
| | <i>Allen E. Cato, Paul Stang, and Robert P. Sutton</i> | |
| 13 | Clinical Drug Trials in the Pediatric Population | 245 |
| | <i>Allen E. Cato</i> | |
| 14 | Challenges to Maintaining Continuity Through Expanded Clinical Trials and the Approval Period | 253 |
| | <i>David M. Cocchetto and Ronald V. Nardi</i> | |
| 15 | Package Inserts as Viewed by the Small Town Private Practitioner | 275 |
| | <i>Judith Kramer Littlejohn</i> | |
| 16 | The Package Insert as a License to Market | 281 |
| | <i>Louis A. Morris and Peter H. Rheinsein</i> | |

| | | |
|----|---|-----|
| 17 | Considerations of the Primary Care Physician in the Evaluation of New Drugs | 295 |
| | <i>Edward C. Sutton and Robert P. Sutton</i> | |
| 18 | Personal Care and Randomized Clinical Trials: Resolving the Basic Conflict | 303 |
| | <i>Bruce L. Miller</i> | |
| 19 | Issues in the Review of Clinical Drug Trials by IRBs | 321 |
| | <i>Dale H. Cowan</i> | |
| 20 | Postmarketing Surveillance for Drug Safety | 347 |
| | <i>Gerald A. Faich, Harry A. Guess, and Joel N. Kuritsky</i> | |
| 21 | Anatomy of Drug Withdrawals in the United States | 363 |
| | <i>Marion J. Finkel</i> | |
| 22 | Drug Withdrawals—Circumstances and Market Impact | 377 |
| | <i>Olav M. Bakke</i> | |
| 23 | Contract Clinical Research: Alternative to In-House Drug Development | 397 |
| | <i>D. C. Heitz and G. H. Besselaar</i> | |
| | <i>Index</i> | 409 |

1

The Challenge of the Clinical Development of Drugs

ALLEN E. CATO *Cato Research Ltd., Chapel Hill, North Carolina*

It would be easier for a camel to go through the eye of a needle than for a new chemical entity (NCE) to make its way from synthesis through the tortuous pathway of development to emerge as a marketed new drug. The process involves a steady progression through multiple stages, with treacherous decision points along the way. It is a long, costly, and extremely risky process. Most of all, it is a process that involves the constant percolating of data through rigorous filters strewn with tribulations complicated by the difficulty of making decisions that affect human health when all the facts are not known.

In order to comprehend the magnitude of drug development, it is useful to consider the many different areas that constitute the drug development process. Figure 1 depicts some of the key disciplines that contribute to the process. Information from each of these areas feeds into a common funnel with a filter, where multiple decisions must progressively be made in order for the compound to survive.

Figures 2 and 3 show the process broken down into preclinical and clinical segments. Keep in mind that the process is a dynamic one. The various disciplines listed are constantly interacting with one another. The entire flow of data requires constant feedback and fine tuning. For example, a compound may be considered slightly too toxic for the amount of pharmacological effect it has. This information would be given by the toxicologist to the chemist, who would make