SMART DECISIONS: Development of National Guiding Principles for Off-label Use of Medicines

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Background

Off-label use of medicines is a common therapeutic strategy in Australian hospitals. In certain patients groups it is considered routine practice and in some cases represent the best available option.[1]

However, the balance of benefits and harms that accompanies off-label medicines use is often less well known[2,3,4] and supporting evidence is generally less thoroughly scrutinised than for TGA registered medicines.

A number of associated clinical, safety, ethical, legal and financial issues require a careful and responsible approach to ensure delivery of Quality Use of Medicines (QUM) to the Australian public.[4]

Aim

The Council of Australian Therapeutic Advisory Groups (CATAG) aimed to develop a consensus framework for the quality use of off-label medicines in Australian public hospitals.

These principles are intended to assist decision-making by health care professionals, Drug and Therapeutics Committees and consumers in their evaluation, approval and use of these medicines.

Methods

- A literature review was undertaken to:
  - define the terminology.
  - identify associated issues relating to off-label medicines use including clinical, ethical, legal and governance matters.
- A draft set of principles was developed by the CATAG project team.
- An Expert Advisory Group (EAG) was convened, comprising expertise in therapeutics/QUM, evidence-based medicine, clinical medicine and pharmacy (adult and paediatric), nursing and consumer issues.
- The EAG met face-to-face in May 2013 to review and refine the proposed principles and decision-making algorithm.
- The draft Guiding Principles were revised and circulated to CATAG members and external professional organisations for comment during August 2013.
- All feedback received will be reviewed to refine the final version. The final document will be presented to the EAG for approval.
- Relevant recommendations for future work will be made.

Definition of off-label

For the purposes of these Guiding Principles the term 'off-label' use applies when the medicine is used in ways other than specified in the TGA approved product information; that is, prescribed or administered:

- **for another indication; or**
- **at a different dose; or**
- **via an alternate route of administration; or**
- **for a patient of an age or gender outside the registered use.**

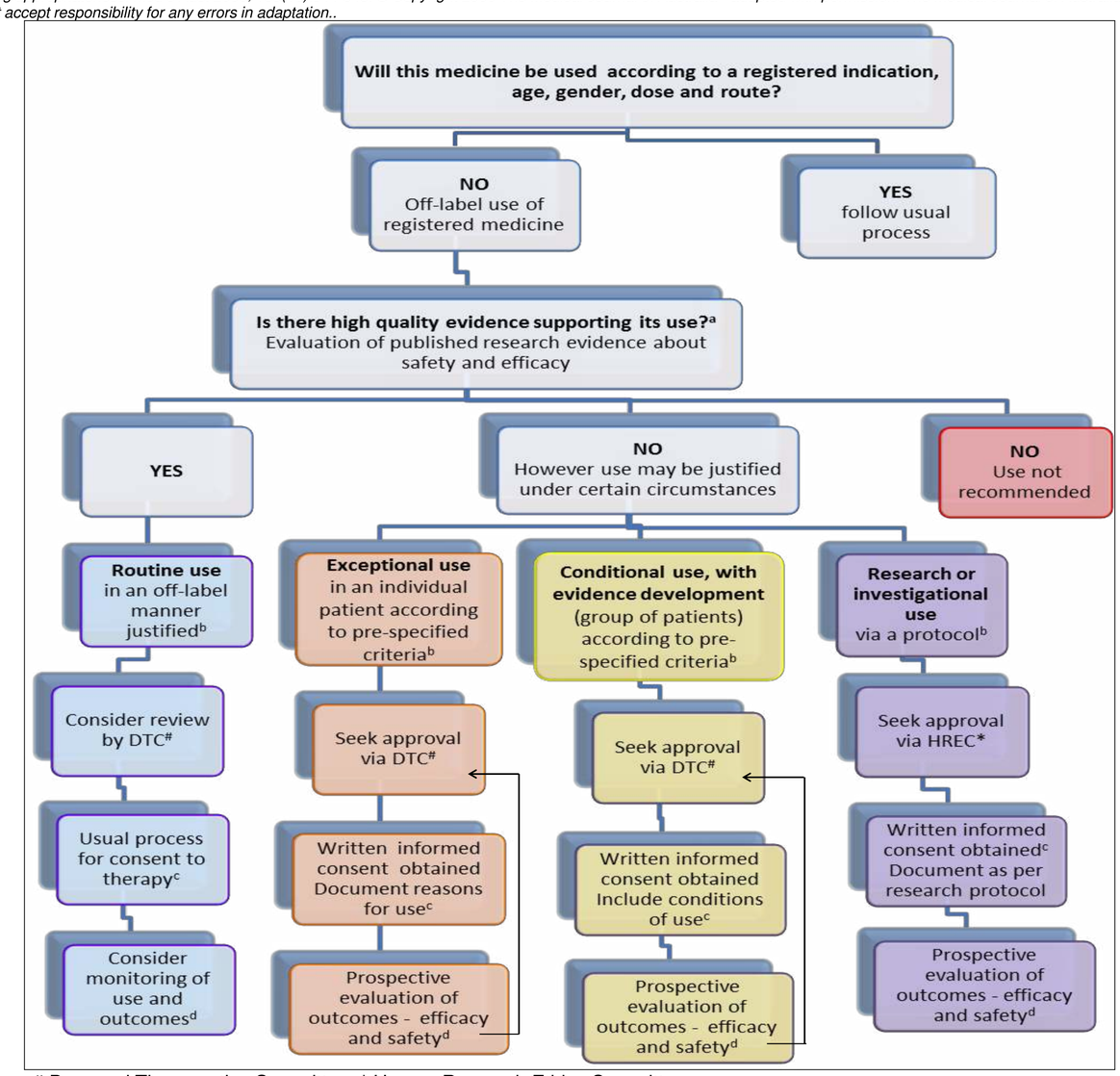
CATAG
Council of Australian Therapeutic Advisory Groups

www.catag.org.au

Guiding Principles

1. **Use high quality evidence to determine appropriateness of off-label medicine use.**
2. **Involve the patient/carer in shared decision making when recommending the use of an off-label medicine.**
3. **Consider review by the Drug and Therapeutics Committee when prescribing an off-label medicine.**
4. **Ensure appropriate information is available at all steps of the medicines management cycle.**
5. **Monitor outcomes, effectiveness and adverse events.**
6. **Consider liability and accountability when using medicines off-label.**

Figure 1: Assessing appropriateness of off-label medicine use and process for approval, consent and monitoring *Gazarian M, Kelly M, et al. Off-label use of medicines: consensus recommendations for evaluating appropriateness. Med J Aust 2006; 185(10):544-548. © Copyright 2006 The Medical Journal of Australia - adapted with permission. The Medical Journal of Australia does not accept responsibility for any errors in adaptation..*



Drug and Therapeutics Committee, * Human Research Ethics Committee
a. See Guiding Principle 1 and Appendix 3 for detailed guidance in answering this question
b. See Guiding Principle 1, point 5 for description of criteria for this category
c. See Guiding Principle 2 d. See Guiding Principle 5

Conclusion

These national guiding principles for off-label use of medicines will assist and standardise decision-making by health care professionals, Drug and Therapeutics committees and consumers in their evaluation, approval and use of off-label medicines.

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References

1. Dresser R, J. F. Off-label prescribing: A call for heightened professional and government oversight. JMLE. 2009;37:476-86,396
2. Aledort L. Off-Label Use of Recombinant Activated Factor VII-Safe or Not Safe? (Editorial). NEJM. 2010;363:853-4.
3. Ansani N, Sirio C, Smitherman T, et al. Designing a Strategy to Promote Safe, Innovative Off-Label Use of Medications. AJMQ 2006;21:255-61.
4. Gazarian M, Kelly M, McPhee J, et al. Off-label use of medicines: consensus recommendations for evaluating appropriateness. MJA 2006;185:544-8