Health Services
LOS ANGELES COUNTY

# POLICIES AND PROCEDURES

**SUBJECT:** DHS OFF-LABEL MEDICATION USE POLICY

**POLICY NO:** 329.005

**PURPOSE:**

The purpose of this policy is to describe requirements for evaluation of the use of a medication for off-label indications, and to outline minimum requirements for supporting literature references that support the off-label medication use.

**BACKGROUND:**

The Food and Drug Administration (FDA) provides a barrier to market entry and use of unproven and unsafe products. For prescription drugs, the FDA approval process requires substantial evidence of efficacy and safety for specific clinical situations. Although approval is indication-specific, the FDA has a limited role once a drug is on the market. The Food, Drug and Cosmetics Act does not limit the manner in which a physician may use an approved drug. Once a product has been approved for marketing, a physician may prescribe it for uses that are not included in the approved labeling (i.e. "off-label" use). Such unapproved or off-label uses, may be appropriate and rational in certain circumstances, and may reflect approaches to drug therapy that have been extensively reported in the medical literature, or are considered community standard of care. To ensure off-label indications are safely prescribed, this policy outlines system-wide standards and requirements for use of off-label medications throughout the Department of Health Services.

**POLICY:**

A. Medications may be used for off-label indications as supported by identified drug references and peer-reviewed scientific evidence with no consensus in the available literature refuting efficacy or indicating that the risks may be greater than the benefits. Off-label prescribing may be considered MEDICALLY NECESSARY when any of the following conditions are met and the therapy is generally accepted as community standard practice for a particular indication:

- The drug is recognized as appropriate for the stated off-label use by one of the following references:
    - The FDA (including listing on the FDA Orphan Drug Approval website)
    - The American Hospital Formulary Service (AHFS) Drug Information Reference

- MICROMEDEX Healthcare Drug resources (online drug information reference)
- The United States Pharmacopoeia Dispensing Information (USPDI), Vol. 1
- The Sanford Guide to Antimicrobial Therapy

- Pediatrics: FDA medication approvals are commonly based on clinical trials conducted in adult study populations. Thus, some FDA-approved medications may not contain pediatric indications for use. Within DHS, a drug is recognized as appropriate for pediatric use if the drug is either FDA-approved for the pediatric age group, as judged by the Chief of Service, there is substantial published literature to support its use in infants/children or the therapeutic use and appropriate dose is included in one of the following pediatric drug information references:
  - Lexi-Comp Pediatric Dosage Handbook
  - The Harriet Lane Handbook
  - Neofax

- Scientific and medical information that concerns the safety or effectiveness of an approved drug for an unapproved new indication that is not included in the product's approved labeling is often published in peer-reviewed journals or reference publications. In the absence of the agent being listed in the above named reference sources, evidence-based supporting material should be reviewed by designated medical and pharmacy staff (at the prescribing site) to validate the proposed use for the specific medical condition. The following are minimum requirements for appropriate supporting materials and references:
  - References should be published by an organization that has an editorial board that utilizes experts who have demonstrated expertise in the subject of the article under review and who are independent of the organization. These experts review and objectively select, reject, or provide comments about proposed articles; and has a publicly stated policy, to which the organization adheres of full disclosure of any conflict of interest or biases for all authors, contributors, or editors associated with the journal or organization.
  - Material should be peer-reviewed and published in accordance with the peer-review procedures of the publication.
  - The material should not be in the form of a special supplement or publication that has been funded in whole or in part by one or more of the manufacturers of the product that is the subject of the article.
  - Material should not be written, edited, excerpted, or published specifically for, or at the request of, a drug manufacturer; or edited or significantly influenced by a

drug manufacturer or any individuals having a financial relationship with the manufacturer.
- Information contained in the scientific or medical journal article or reference publication should address adequate and well-controlled clinical investigations that are considered scientifically sound by experts with scientific training and experience to evaluate the safety or effectiveness of the drug.

B. Prescriptions for off-label use will be reviewed for appropriateness by a pharmacist. Off-Label Order review shall include evaluation of the following:
   - Appropriate dosage, frequency, and route of administration for specific patient parameters
   - Potential therapeutic duplications
   - Potential allergies or sensitivities
   - Potential drug-drug interactions, drug-food interactions, drug-disease interactions, drug-lab interactions
   - Current DHS formulary status
   - Patient renal function; possibility of renal dose adjustment
   - Other clinical issues or concerns

C. All prescriptions that are deemed inappropriate will be discussed with the prescriber. The pharmacist may request submission of additional supporting references, and escalate to the medical director (or designee) as appropriate, per current policy on medication order escalation.

**DEFINITIONS:**

- **FDA approved labeled indication:** Indications for use approved by the FDA.
- **Off-label indication:** Indications for use not approved by the FDA

**REFERENCES:**

FDA Orphan Drug Approval website (http://www.accessdata.fda.gov/scripts/opdlisting/oopd/index.cfm)
The American Hospital Formulary Service (AHFS) Drug Information Reference
MICROMEDEX Healthcare Drug Resources (online drug information reference)
The United States Pharmacopoeia Dispensing Information (USPDI), Vol. 1
The Sanford Guide to Antimicrobial Therapy
Lexi-Comp Pediatric Dosage Handbook
The Harriet Lane Handbook
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