



Management of hypertension in CKD: What's different point among ARBs?

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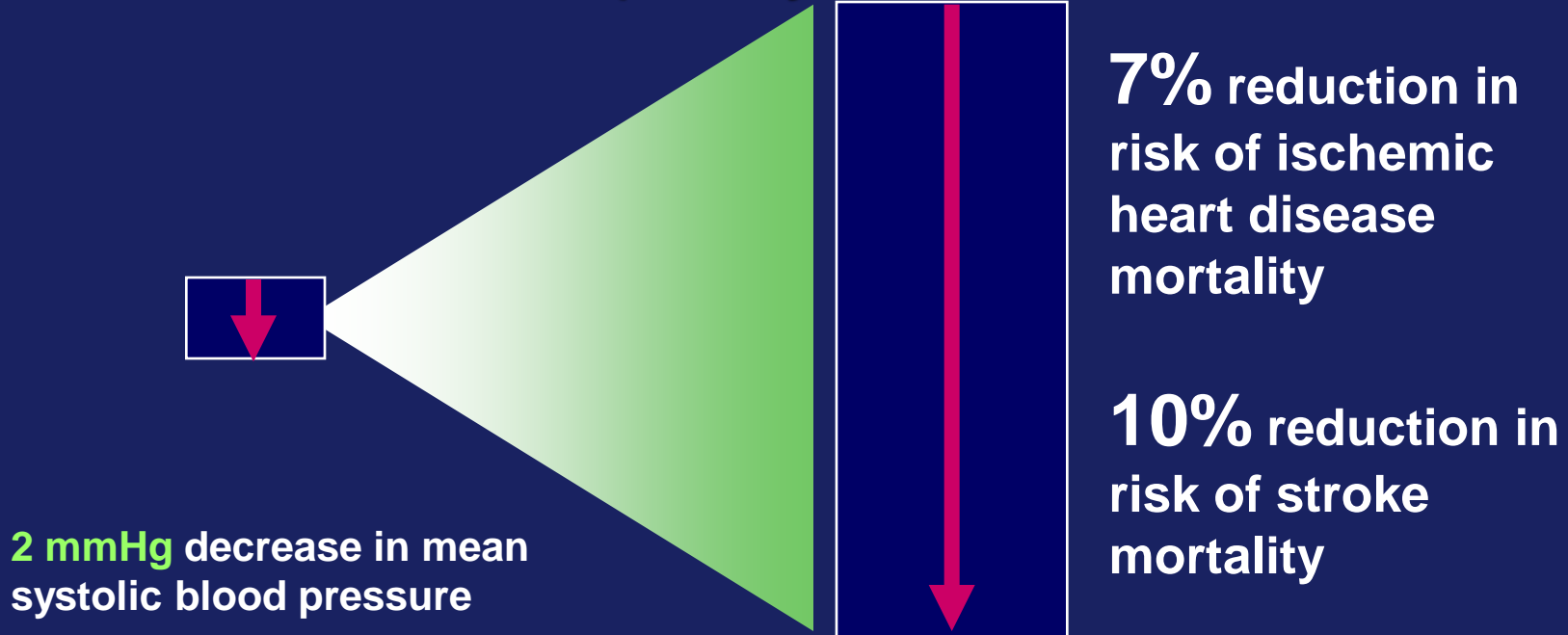
Division of Nephrology, Bhumibol Adulyadej Hospital

Topics

- Current guideline for HT management
- Role of RAS blockade in **Cardio-Kidney Damage Continuum**
- Review of Clinical Evidences of **RAS Blockade Therapy** focusing on Renoprotection
- Original vs Generic ARB: **What is the difference?**

Blood pressure reductions of as little as 2 mmHg reduce the risk of cardiovascular events by up to 10%

- Meta-analysis of 61 prospective, observational studies
- One million adults
- 12.7 million person-years

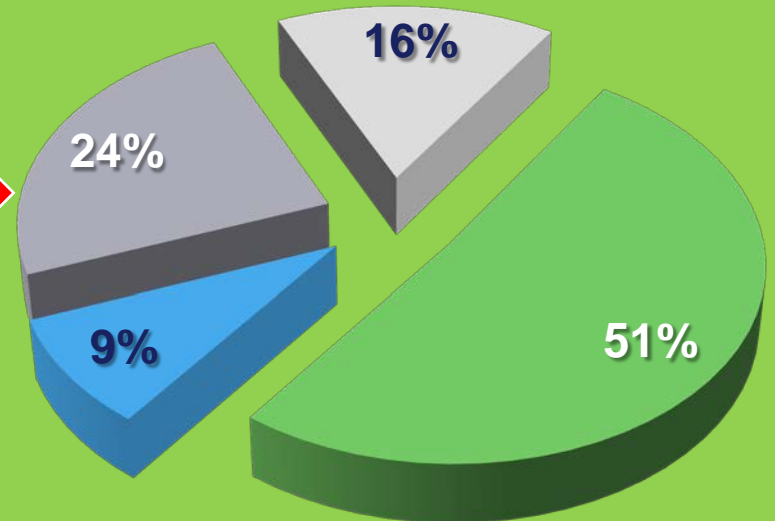
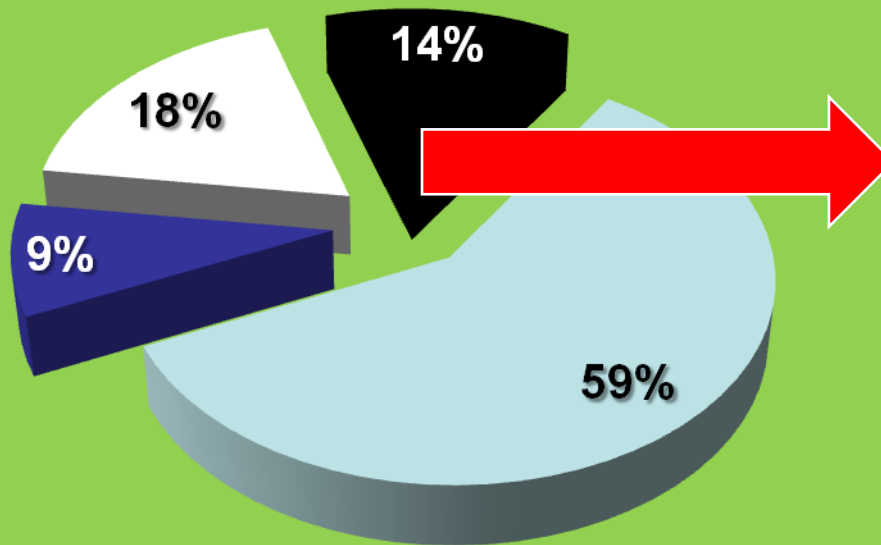


EGAT study: HT in real world

EGAT 1 (1985) n=784
(3497)

EGAT 3 (2009) n= 561
(2070)

- Unawareness
- Rx, Not controlled
- Aware, not Rx
- Rx, Controlled

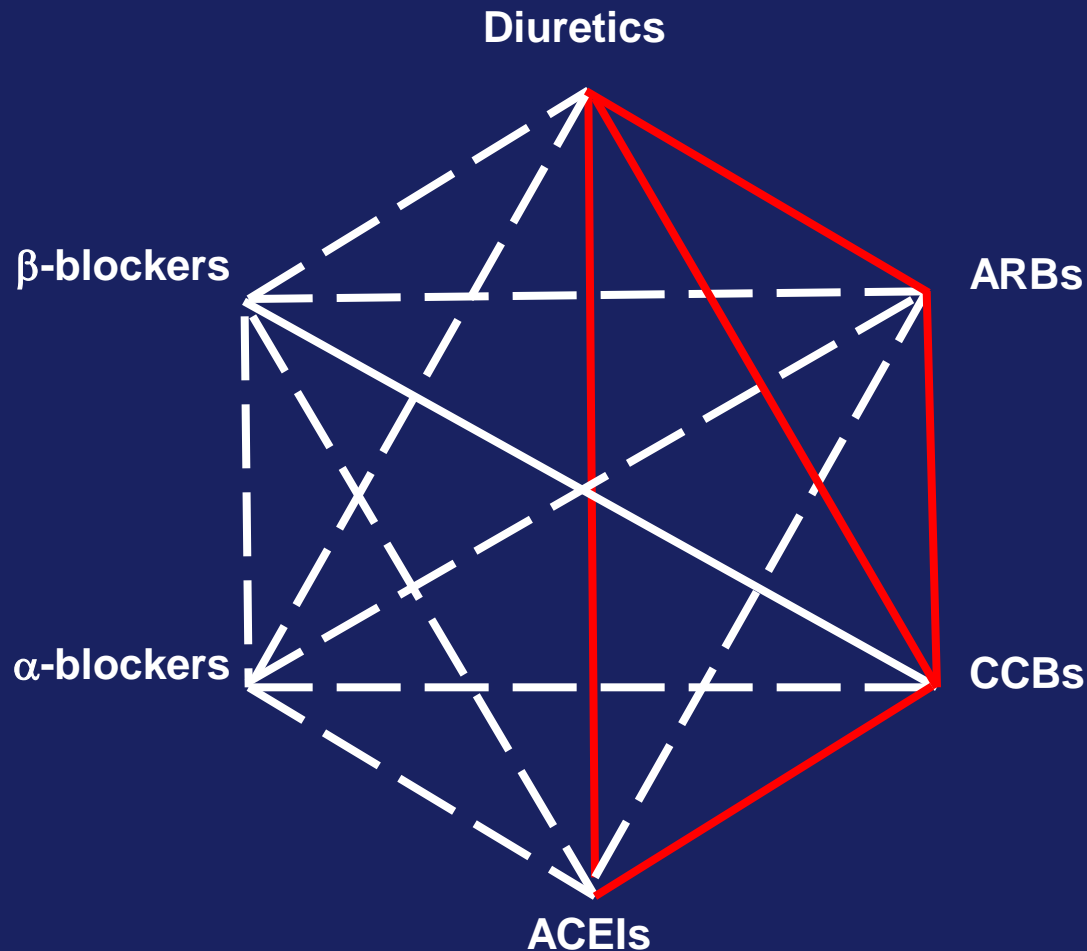


ESH–ESC Guidelines Recommend Target BP Goals of <140/90 mmHg for Uncomplicated Hypertension and <130/80 mmHg for Complicated Hypertension

Type of hypertension	BP goal (mmHg)
Uncomplicated	<140/90
Complicated	
Diabetes mellitus	<130/80
Kidney disease	<130/80*
Other high risk (stroke, myocardial infarction)	<130/80

*Lower if proteinuria is >1 g/day

ESH–ESC Recommendations for Combining BP-lowering Drugs and Availability as Single-pill Combinations



■ ESH-ESC recommendations include

- ARB + diuretic
- ARB + CCB
- CCB + diuretic

— Preferred combinations

- - Less frequently used/combination used as necessary

NICE Hypertension Guidelines

Aged <55yrs

Aged \geq 55yrs
or Black AC

Step 1

A

C*

Step 2

A + C*

Step 3

A + C* + D

Step 4

Resistant
Hypertension

A + C* + D + Further Diuretic⁺
Consider specialist Advice

A = ACEi or ARB

C = CCB

D = Thiazide-like
diuretic

C* = CCB preferred but
D is an alternative in
people intolerant of C
or at high risk of heart
failure

Further Diuretic:
Consider low dose
spironolactone or higher
dose thiazide

NICE hypertension guidelines 2011 <http://guidance.nice.org.uk/CG127/>

QuickRefGuide/pdf/English accessed August 2011)

How about Thailand?

ตารางที่ 8 หลักการใช้ยาลดความดันโลหิต

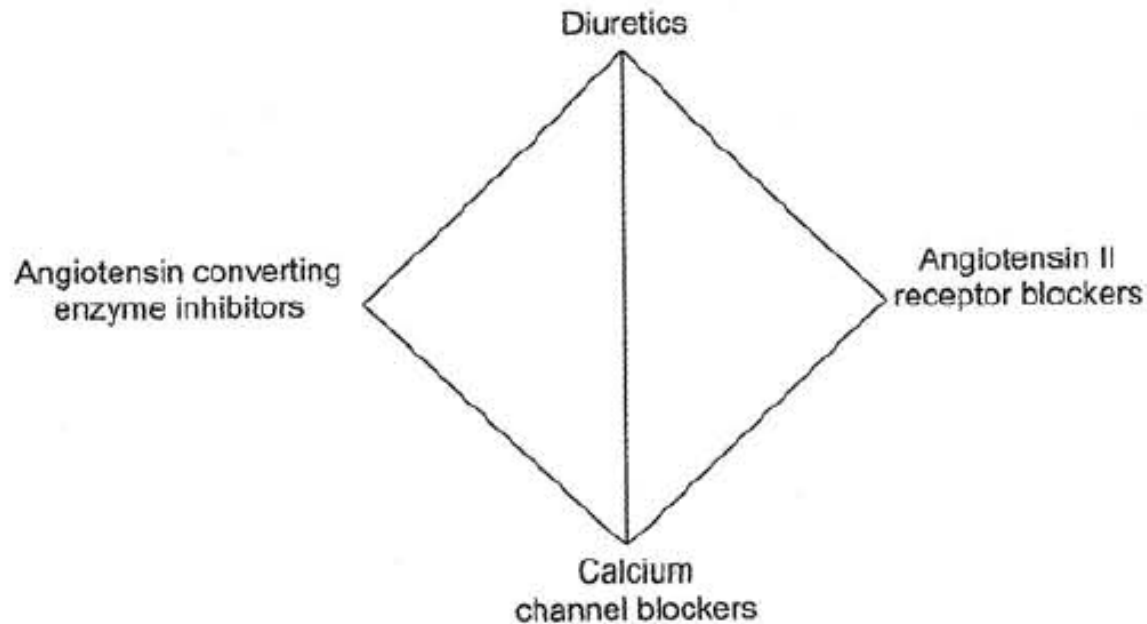
	อายุ \leq 55 ปี	อายุ $>$ 55 ปี
Step 1	A	C/D
Step 2	A + C/D	C/D + A
Step 3	A + C + D	
Step 4	A + C + D	

เพิ่ม diuretics เช่น spironolactone 25 มก./วัน หรือ
furosemide ก่อนการให้ α -blocker หรือ β -blocker

- หมายเหตุ:** A: ACEIs หรือ ARBs (ให้ใช้ ACEIs ก่อน หากเกิดอาการไอ จึงเปลี่ยนเป็น ARBs) (น้ำหนัก +/-คุณภาพหลักฐาน I)
- C: Calcium channel blockers (ให้เลือกใช้ก่อน diuretics) (น้ำหนัก +/-คุณภาพหลักฐาน II)
- D: Diuretic (ให้ระวังการใช้ในผู้ที่มีความเสี่ยงต่อการเป็นโรคเบาหวาน โรคเก๊าท์ และการเกิดภาวะเกลือแร่ผิดปกติในเลือดซึ่งมักพบในผู้สูงอายุ)

Thailand HT Guideline

รูปที่ 1 การเลือกใช้ยาลดความดันโลหิตที่สามารถเสริมฤทธิ์กัน



Special Communication

2014 Evidence-Based Guideline for the Management of High Blood Pressure in Adults

Report From the Panel Members Appointed to the Eighth Joint National Committee (JNC 8)

Paul A. James, MD; Suzanne Oparil, MD; Barry L. Carter, PharmD; William C.ushman, MD; Cheryl Dennison-Himmelfarb, RN, ANP, PhD; Joel Handler, MD; Daniel T. Lackland, DrPH; Michael L. LeFevre, MD, MSPH; Thomas D. MacKenzie, MD, MSPH; Olugbenga Ogedegbe, MD, MPH, MS; Sidney C. Smith Jr, MD; Laura P. Svetkey, MD, MHS; Sandra J. Taler, MD; Raymond R. Townsend, MD; Jackson T. Wright Jr, MD, PhD; Andrew S. Narva, MD; Eduardo Ortiz, MD, MPH

JAMA. doi:10.1001/jama.2013.284427
Published online December 18, 2013.

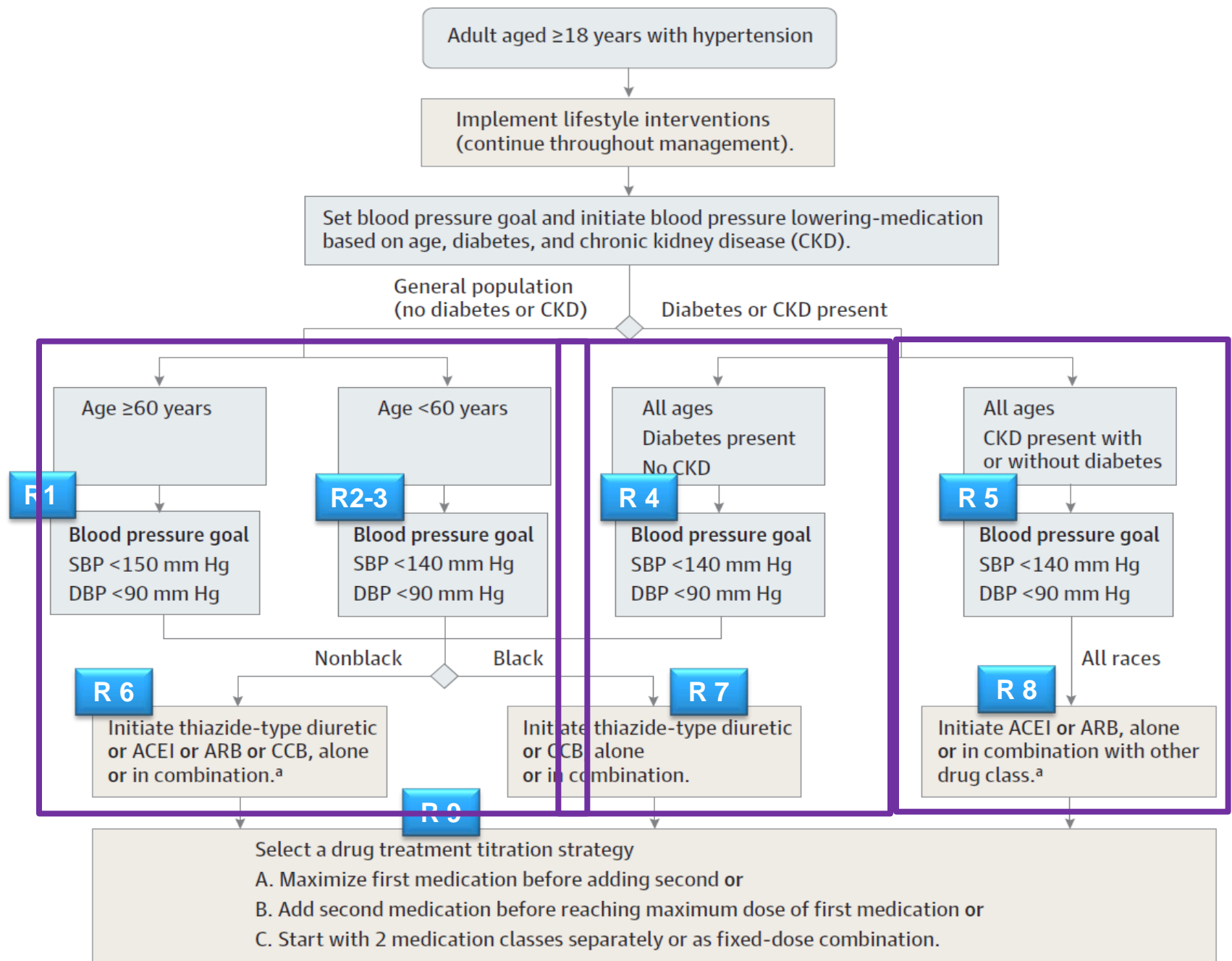
2014 Guideline for Management of High Blood Pressure

Questions Guiding the Evidence Review

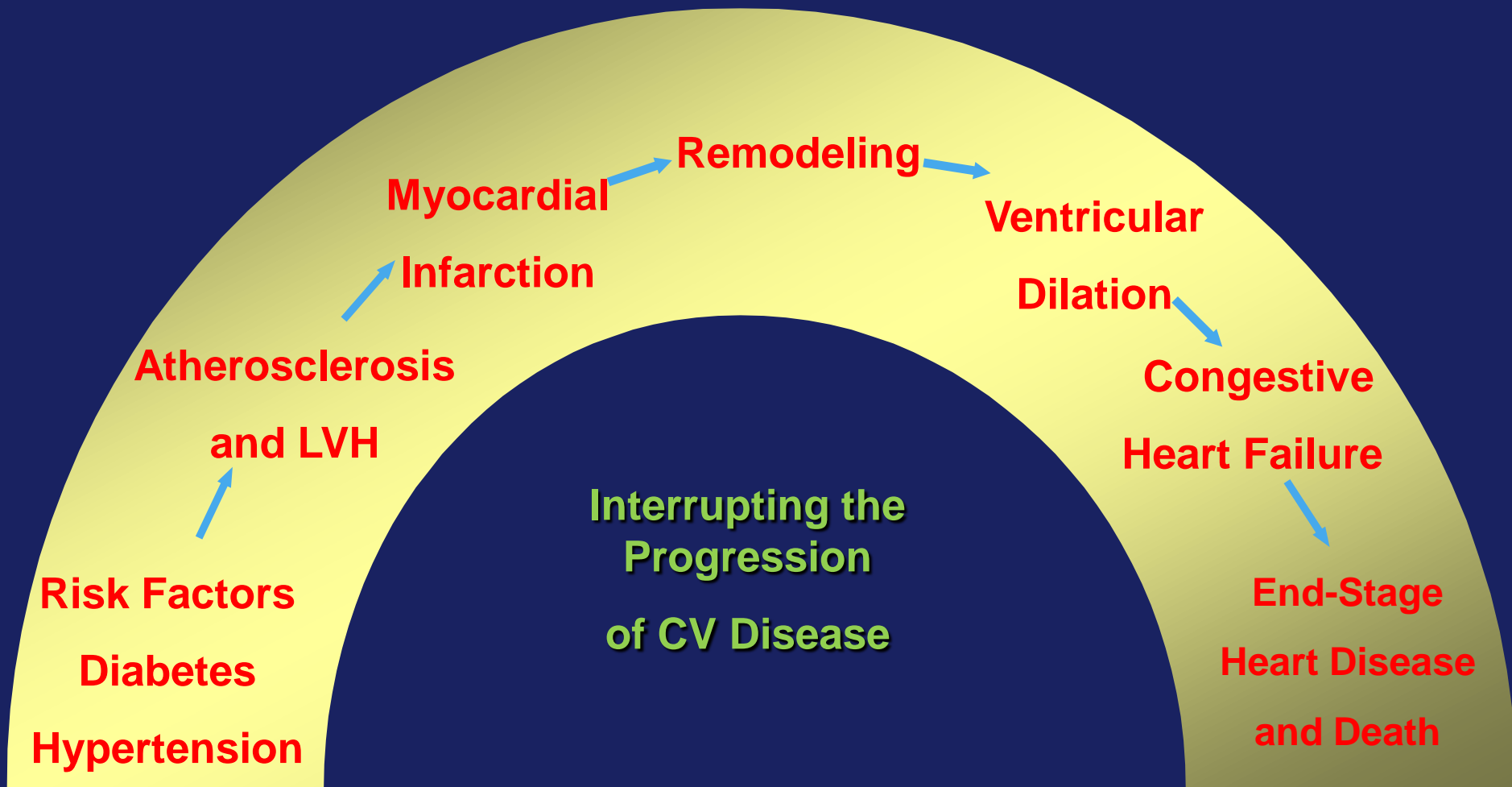
This evidence-based hypertension guideline focuses on the panel's 3 highest-ranked questions related to high BP management identified through a modified Delphi technique.⁵ Nine recommendations are made reflecting these questions. These questions address thresholds and goals for pharmacologic treatment of hypertension and whether particular antihypertensive drugs or drug classes improve important health outcomes compared with other drug classes.

1. In adults with hypertension, does treatment with antihypertensive pharmacologic therapy **THRESHOLD** health outcomes?
2. In adults with hypertension, does treatment with antihypertensive pharmacologic therapy **Goal?** goal lead to improvements in health outcomes?
3. In adults with hypertension, do various antihypertensive drugs or drug classes differ in **Drug?** benefits and harms on specific health outcomes?

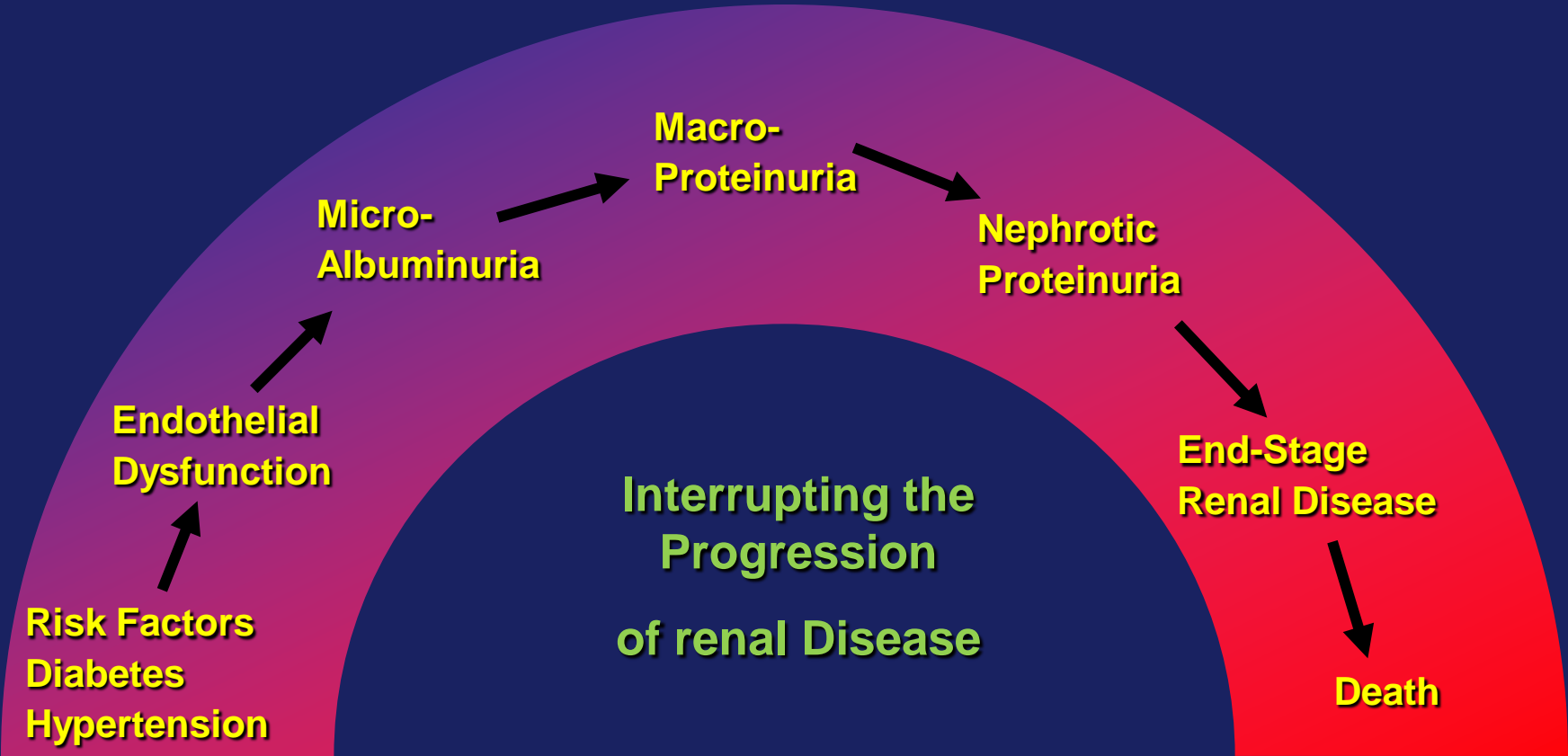
Figure. 2014 Hypertension Guideline Management Algorithm



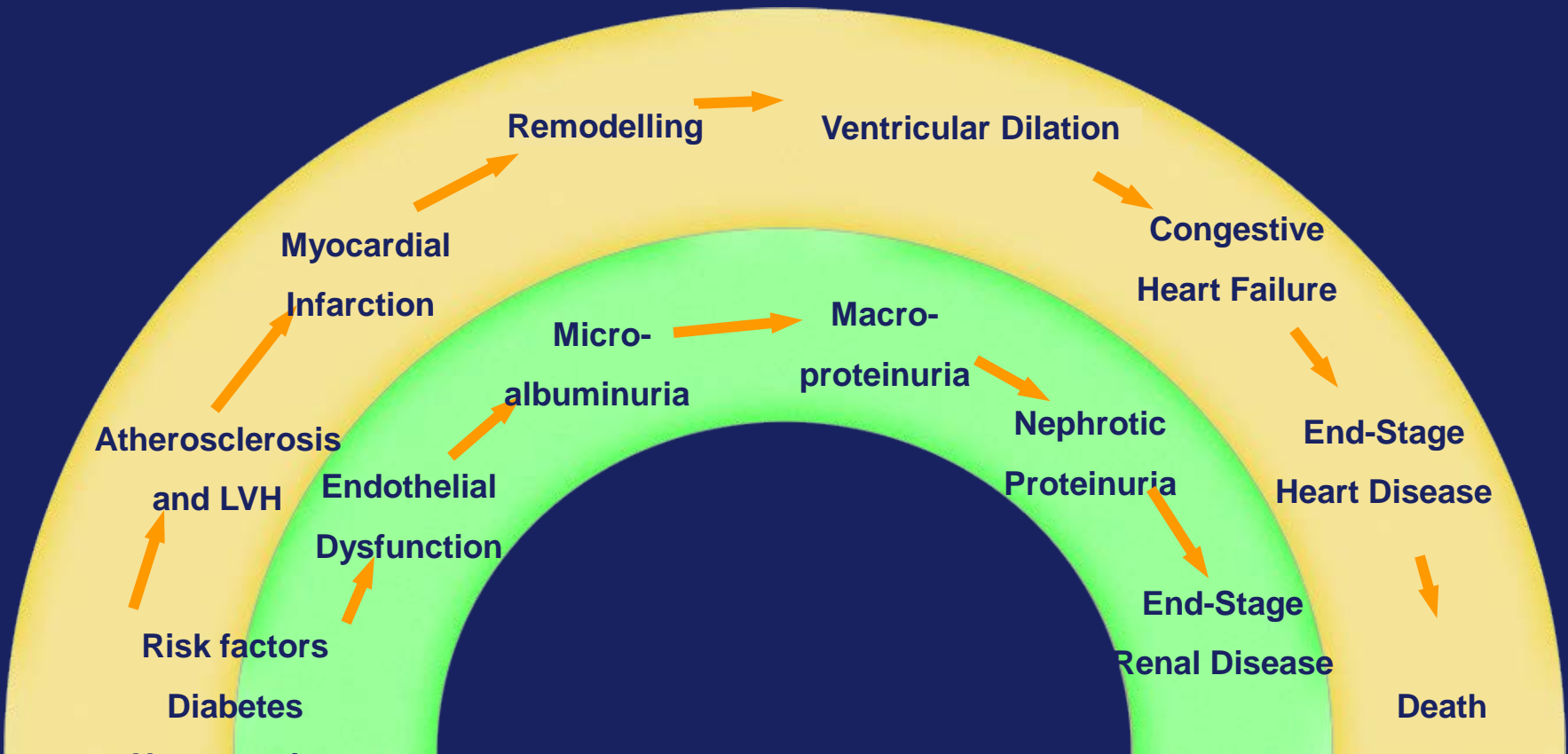
Morbidity and Mortality Along the Cardiovascular Continuum



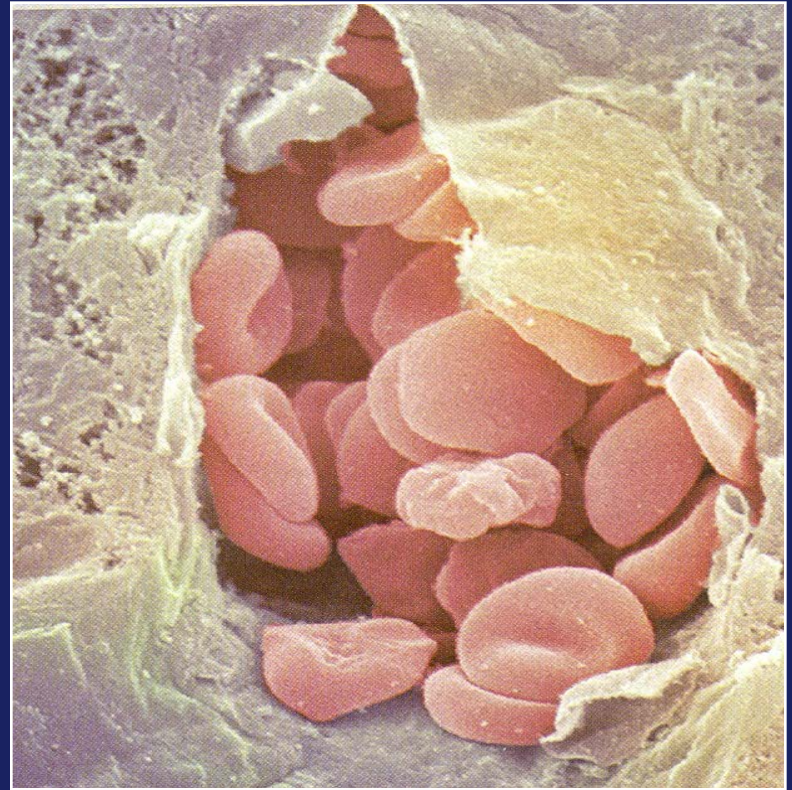
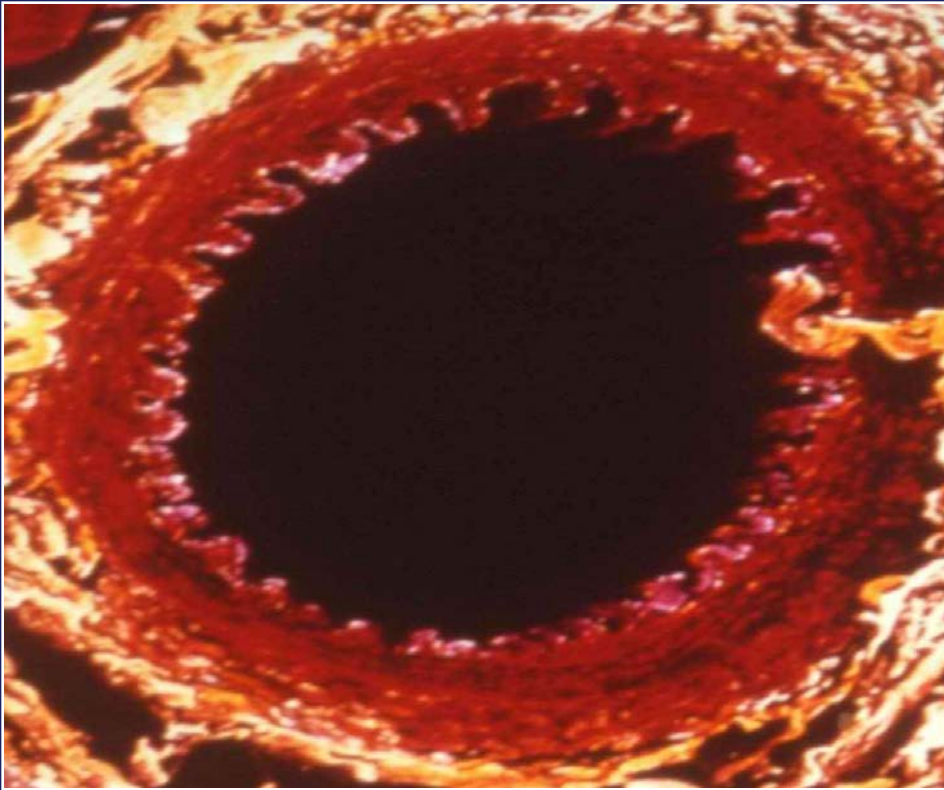
Morbidity and Mortality Along the Renal Continuum



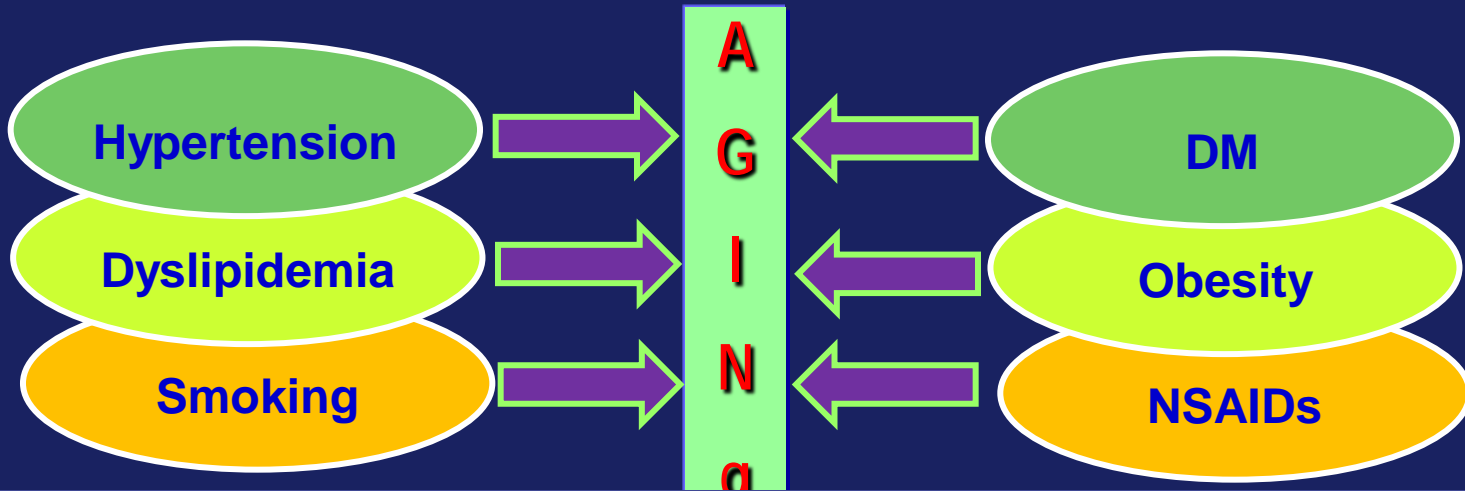
The Cardio-Kidney-Damage Continuum



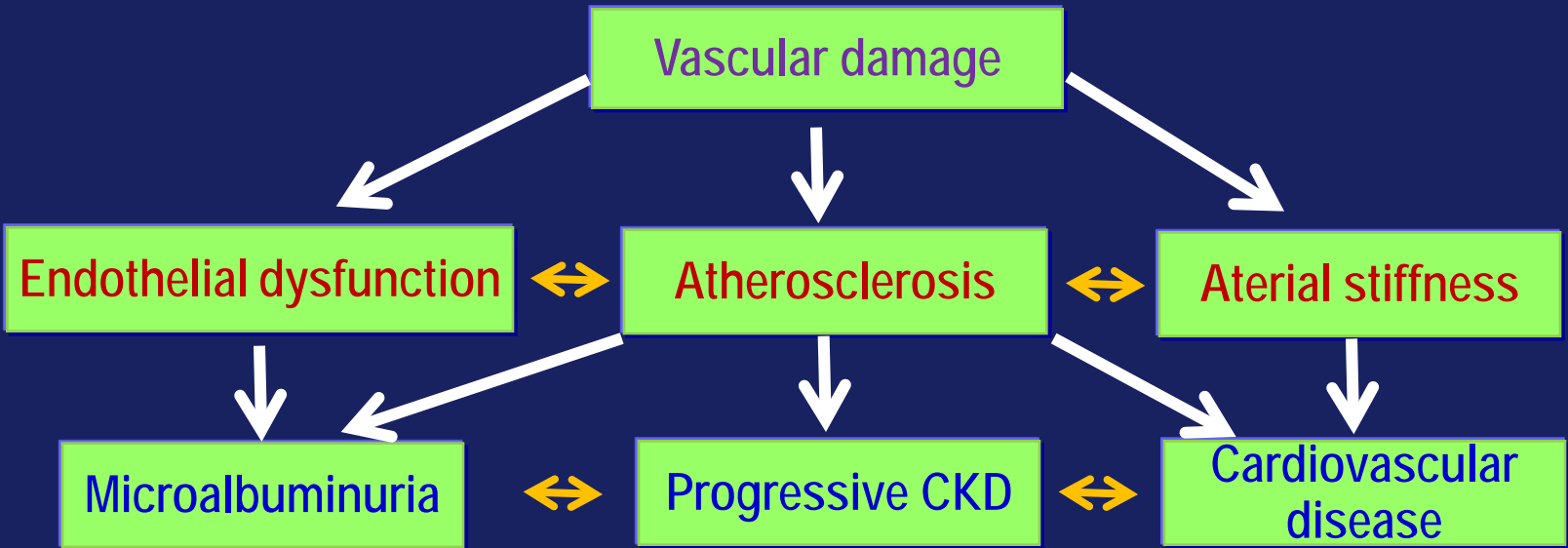
Endothelium



- ❖ Weight: 1.5 kg, surface: $>800 \text{ m}^2$
- ❖ Produces >250 active substances
- ❖ Undergoes the life and death cycle



The Cardio-Kidney-Damage Continuum



Adapted from El Nahas AM et al. Kidney Int. 2010;78(1):14-8.

คำแนะนำและข้อบ่งชี้ การใช้ยานอกบัญชียาหลักแห่งชาติ ที่มีราคาแพง

กลุ่มยา Angiotensin Converting Enzyme
Inhibitor and Angiotensin Receptor Blocker

จัดทำโดย

คณะกรรมการยอยกกำหนดคำแนะนำและ

ข้อบ่งชี้ การใช้ยานอกบัญชียาหลักแห่งชาติที่มีราคาแพง

กลุ่มยา Angiotensin Converting Enzyme Inhibitor and
Angiotensin Receptor Blocker

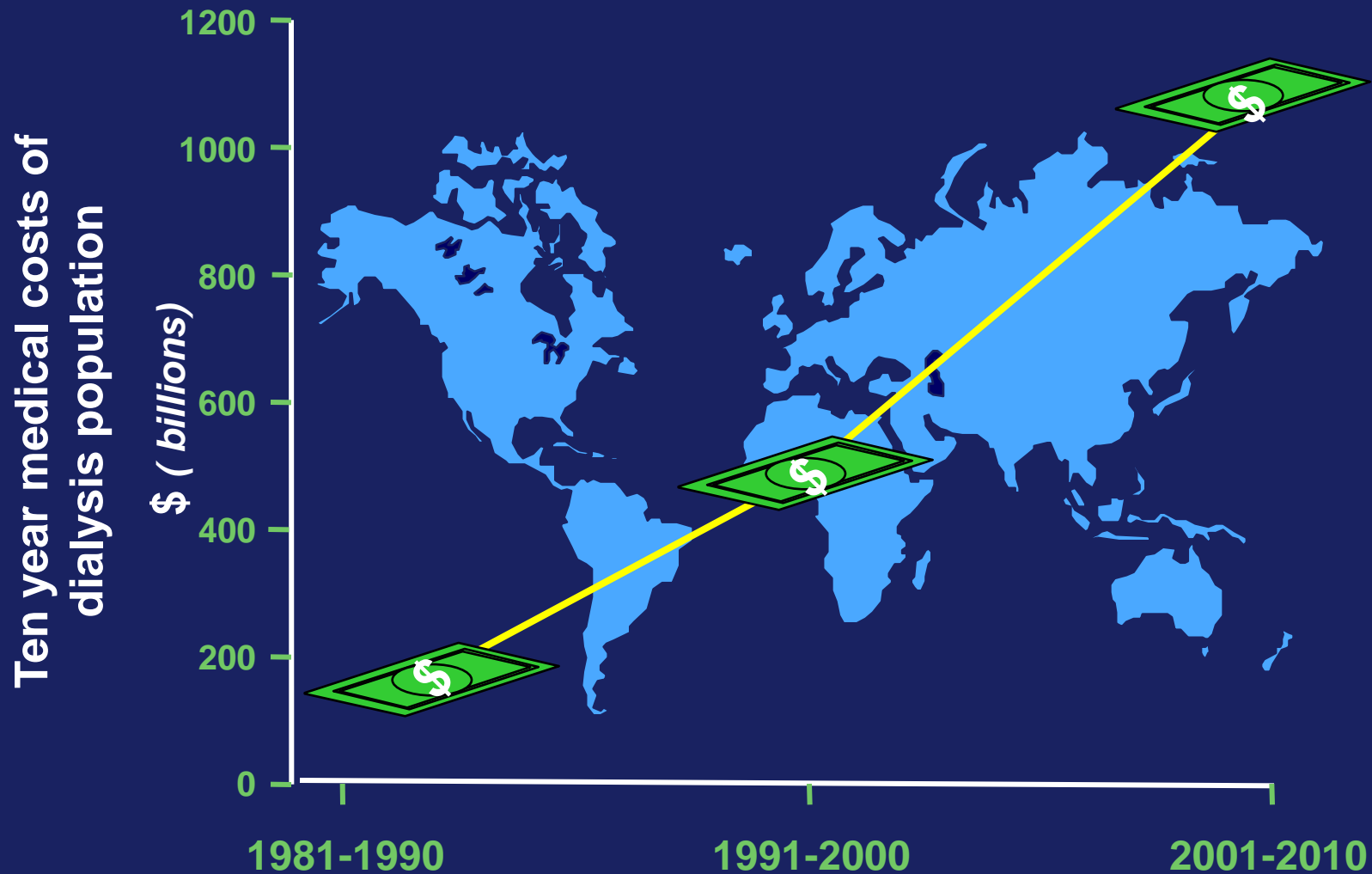
ตารางสรุปน้ำหนักของคำแนะนำและคุณภาพหลักฐานของการใช้ยาในกลุ่ม ACEI

Indications	Captopril	Enalapril	Lisinopril	Quinapril	Ramipril	Perindopril	Imidapril
High risk population (e.g.HT,DM,LVH,MetS)	-	-	-	-	++,1	+, 1	-
Acute coronary syndrome	++,1	+/-,1	++,1	-	++,2	+, 1	-
Stable coronaryheart disease	-	+/-,2		+/-,1	++,1	++,1	
Congestive heart failure (lowEF)	+, 1	++,1	+/-, 2	-	-	-	-
Congestive heart failure (NormalEF)	-	-	-	-	-	+/-,2	-
Diabetic kidney disease (Microalbuminuria)	+/-,1	-	-	-	++,1	-	-
Diabetic kidney disease (Macroalbuminuria)	++,1	-	-	-	-	-	-
Non-Diabetic kidney disease (Proteinuria > 1 g/day)	-	-	-	-	++,1	-	-
STROKE (secondaryprevention)	-	-	-	-	+, 2	+, 1	-

ตารางสรุปน้ำหนักของคำแนะนำและคุณภาพหลักฐานของการใช้ยาในกลุ่ม ARB

Indications	Losartan	Irbesartan	Valsartan	Candesartan	Telmisartan	Olmesartan
Highriskpopulation (e.g.HT,DM,LVH,MetS)	++,1	-	+, 1	+/-,1	++,1	+/-,1
Acute coronary syndrome	+/-,1	-	++,1	-	-	-
Stable coronary heart disease	-	-	-	-	++,1	-
Congestive heart failure (lowEF)	+/-,1	-	+, 1	++,1	-	-
Congestive heart failure (NormalEF)	-	+/-,1	-	+/-,1	-	-
Diabetic kidney disease (Microalbuminuria)	-	++,1	+/-,2	-	+, 2	-
Diabetic kidney disease (Macroalbuminuria)	++,1	++,1	-	-	-	+/-,1
Non-Diabetic kidney disease (Proteinuria > 1 g/day)	+,1	-	+, 2	-	-	-
STROKE (secondary prevention)	-	-	-	+/-,1	+/-,1	-

PREDICTED DIALYSIS COST FOR THE COMING DECADE

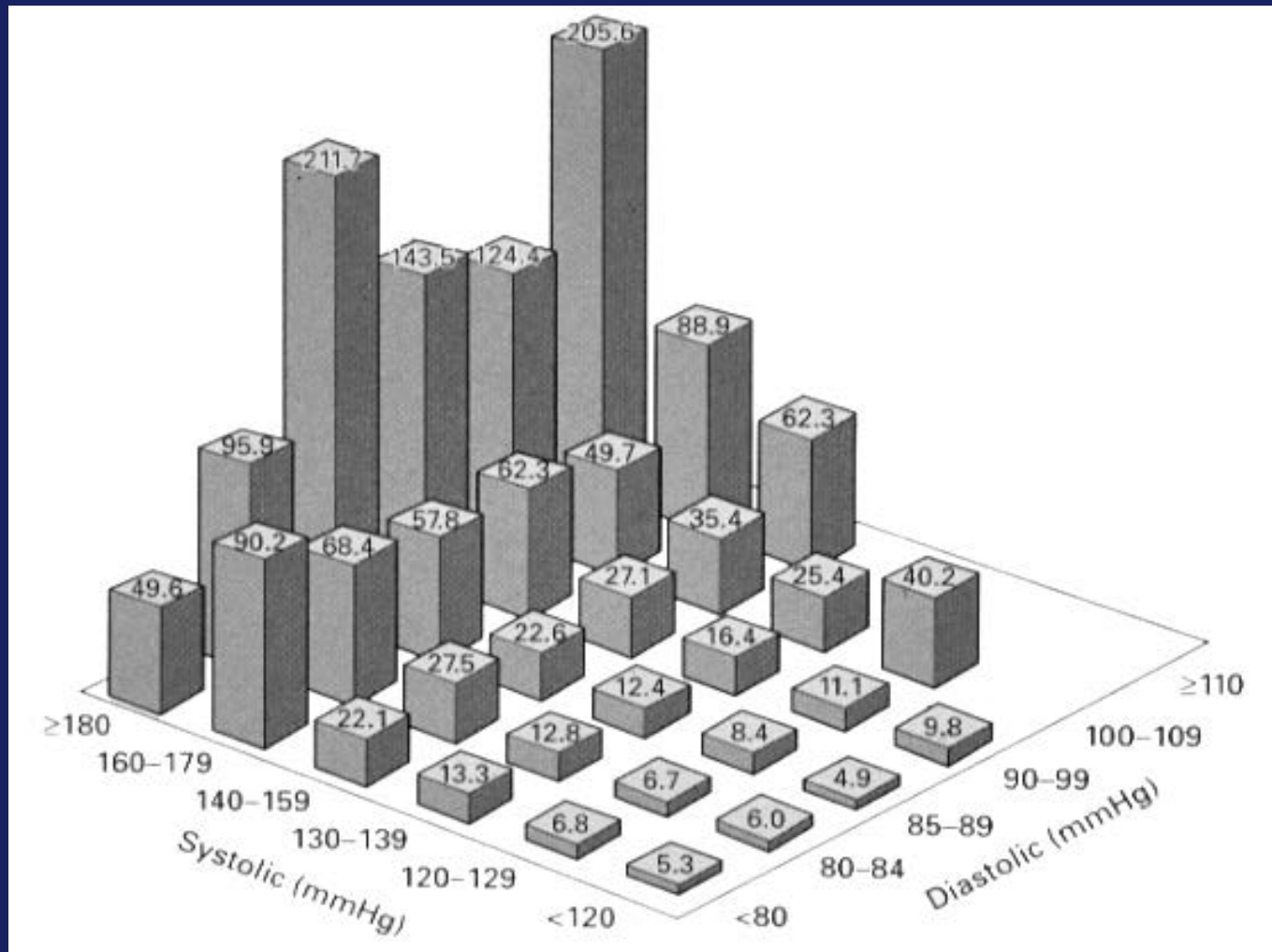


Prevalence of CKD: Thai SEEK Study

Stage	Description	GFR (mL/min/1.73 m ²)	
1	Kidney damage with normal GFR	> 90	} 8.9%
2	Mild renal insufficiency	60-89	
3	Moderate renal insufficiency	30-59	} 8.7%
4	Severe renal insufficiency	15-29	
5	Kidney failure	<15	

(or dialysis)

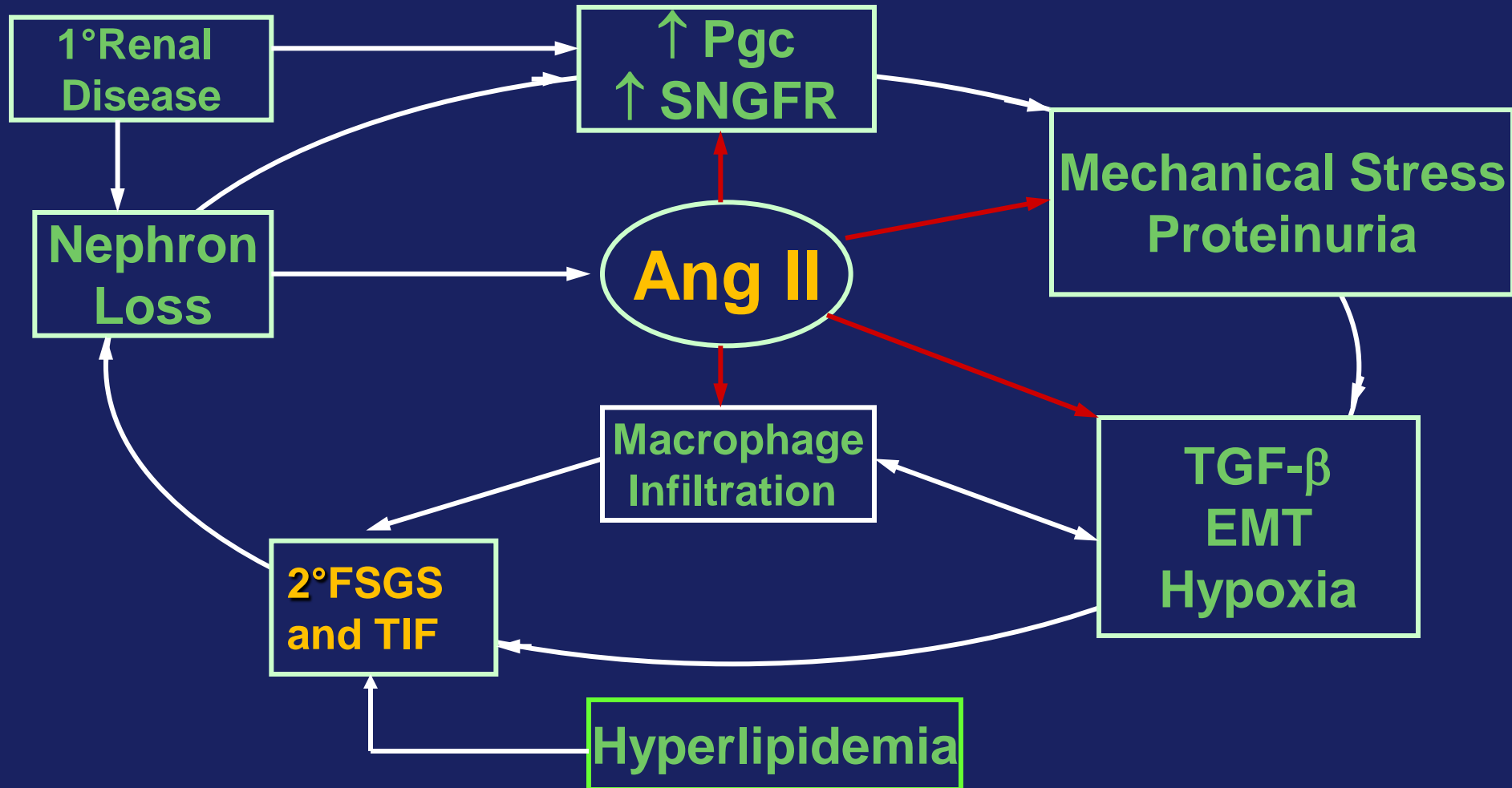
Age-adjusted rate of ESRD per 100,000 patient-years



N = 332,544

Age : 35-57 yr

CKD Progression



Role of Proteinuria in Progression of CKD

Inflammation

Interstitial Fibrosis

Mesangial expansion

Hypertension

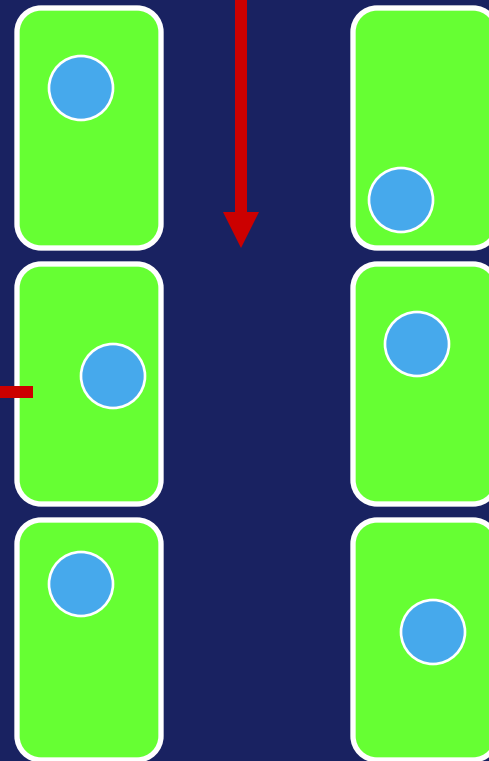


MCP-1, RANTES

Endothelin

TGF- β , Collagen

Excess filtered
protein

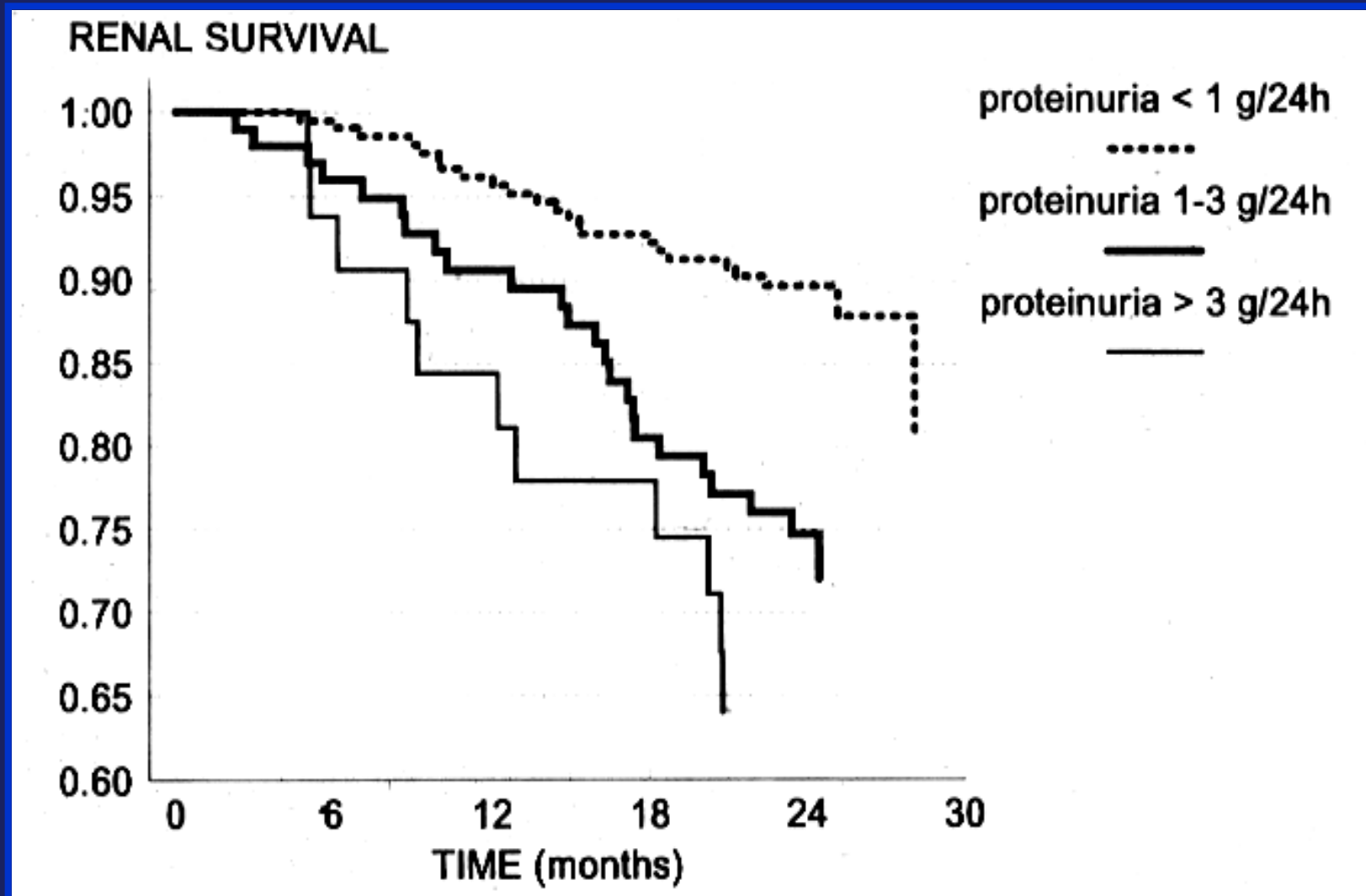


Remuzzi et al.

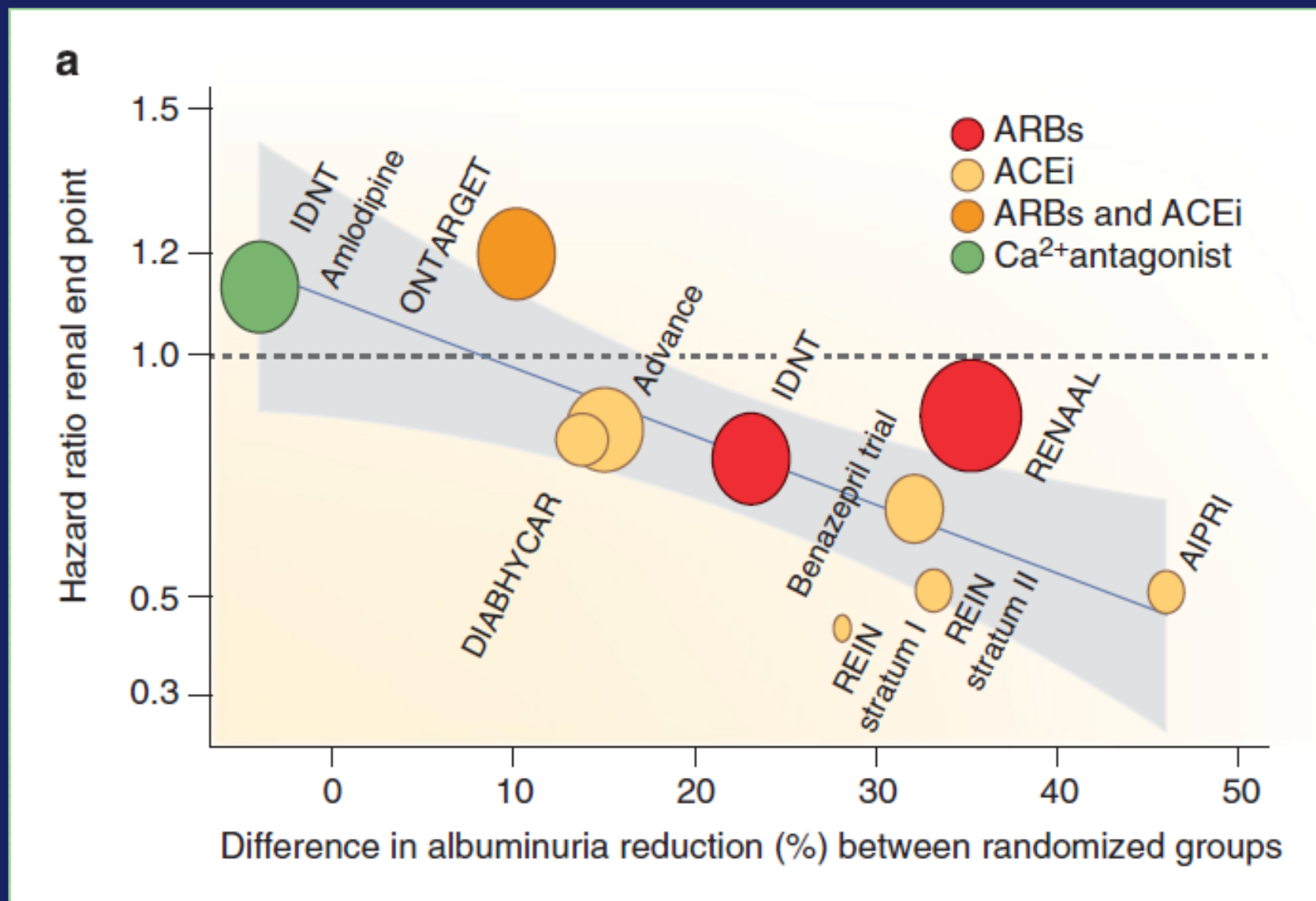
NEJM 339:1448-56

1998

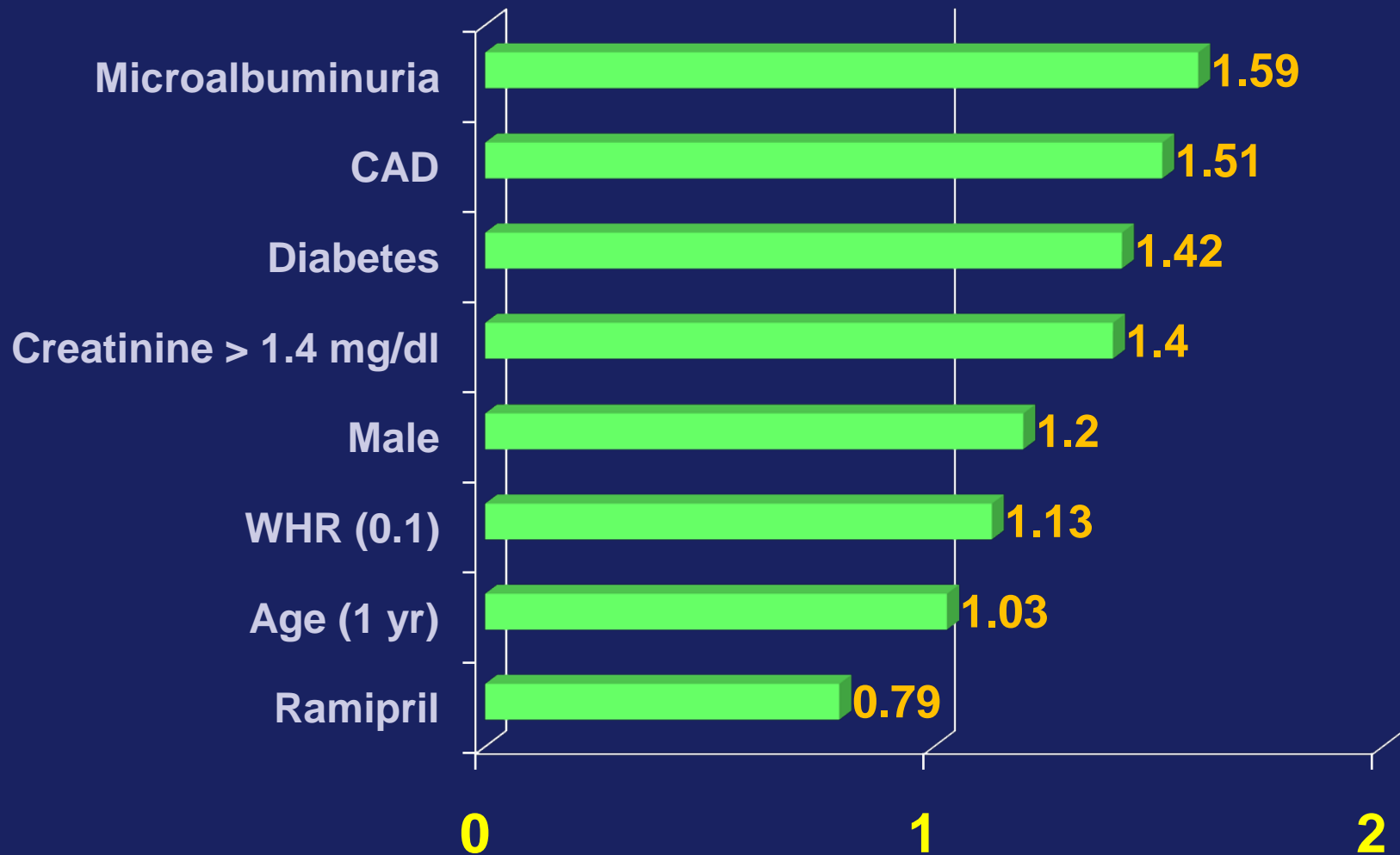
Proteinuria: REIN Study



Albuminuria Reduction Predict Renal Protection



Multivariate Hazard Ratios for Primary Outcome in HOPE Study



GFR Categories in CKD: KDIGO 2012

Stage	GFR (mL/min/1.73 m ²)	Terms
G1	≥ 90	Normal or high
G2	60-89	Mildly decreased
G3a	45-59	Mildly to moderately decreased
G3b	30-44	Moderately to severely decreased
G4	15-29	Severely decreased
G5	<15	Kidney failure

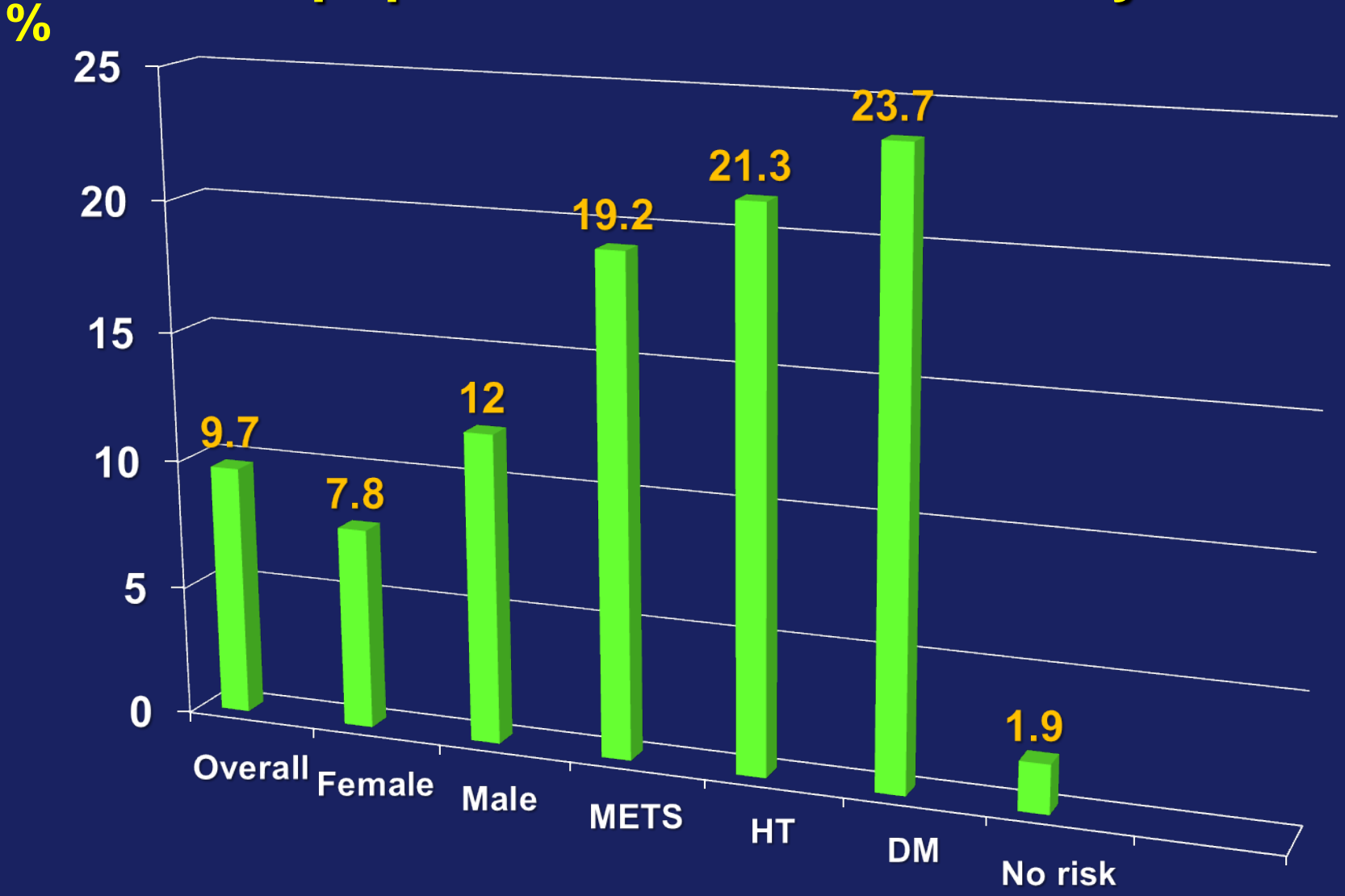
Albuminuria Categories in CKD: KDIGO 2012

Categories	Albuminuria (mg/day)	ACR (mg/g)	Terms
A1	< 30	< 30	Normal to mildly increased
A2	30 - 300	30 - 300	Moderately increased
A3	> 300	> 300	Severely increased

Prognosis of CKD by GFR and Albuminuria Categories: KDIGO 2012

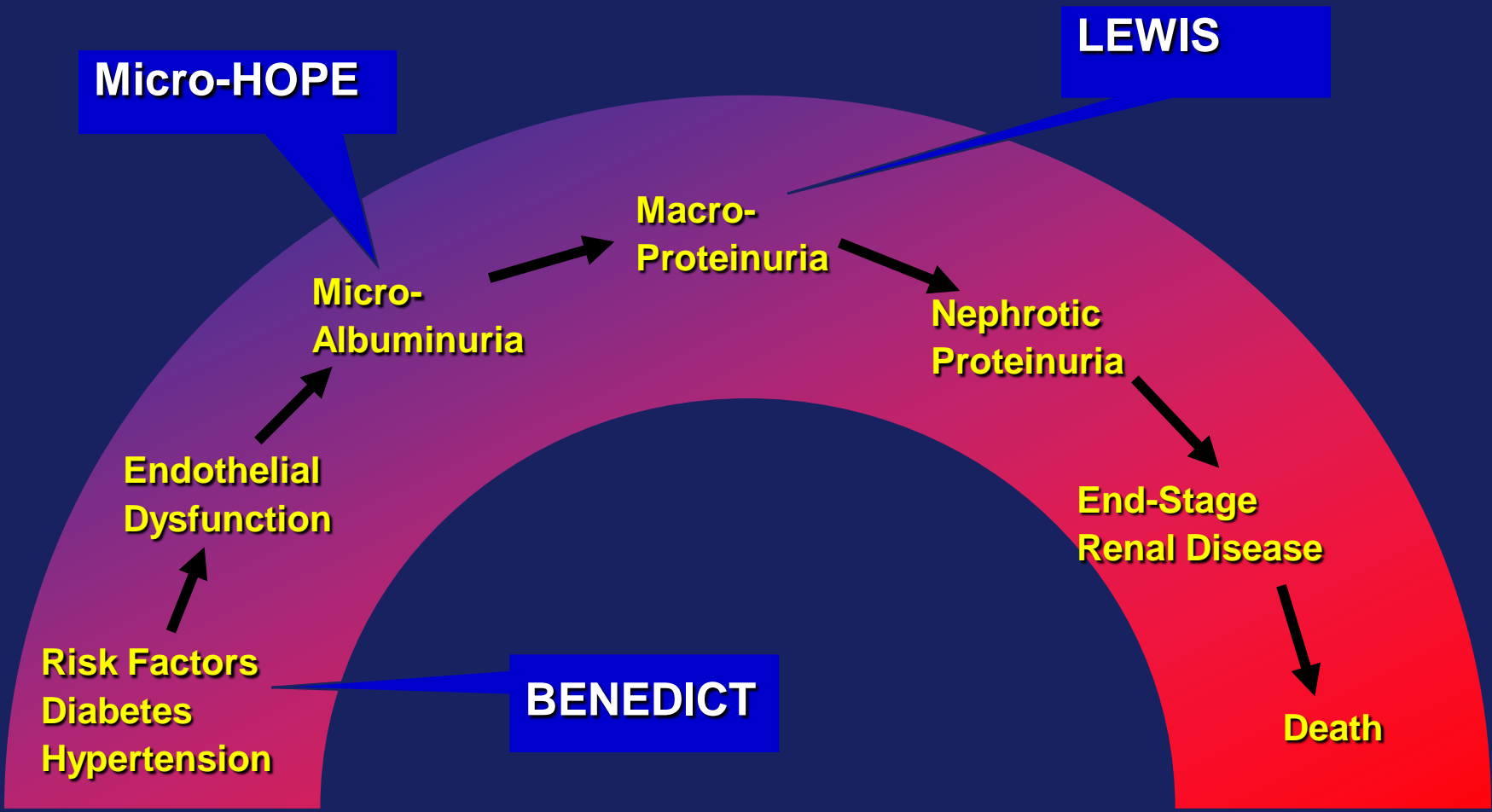
				Persistent albuminuria categories		
				Description and range		
				A1	A2	A3
				Normal to mildly increased	Moderately increased	Severely increased
				<30 mg/g <3 mg/mmol	30-300 mg/g 3-30 mg/mmol	>300 mg/g >30 mg/mmol
				GFR categories (ml/min/1.73m ²) Description and range	G1	Normal or high
G2	Mildly decreased	60-89				
G3a	Mildly to moderately decreased	45-59				
G3b	Moderately to severely decreased	30-44				
G4	Severely decreased	15-29				
G5	Kidney failure	<15				

Prevalence of microalbuminuria in specific population: Thai SEEK Study



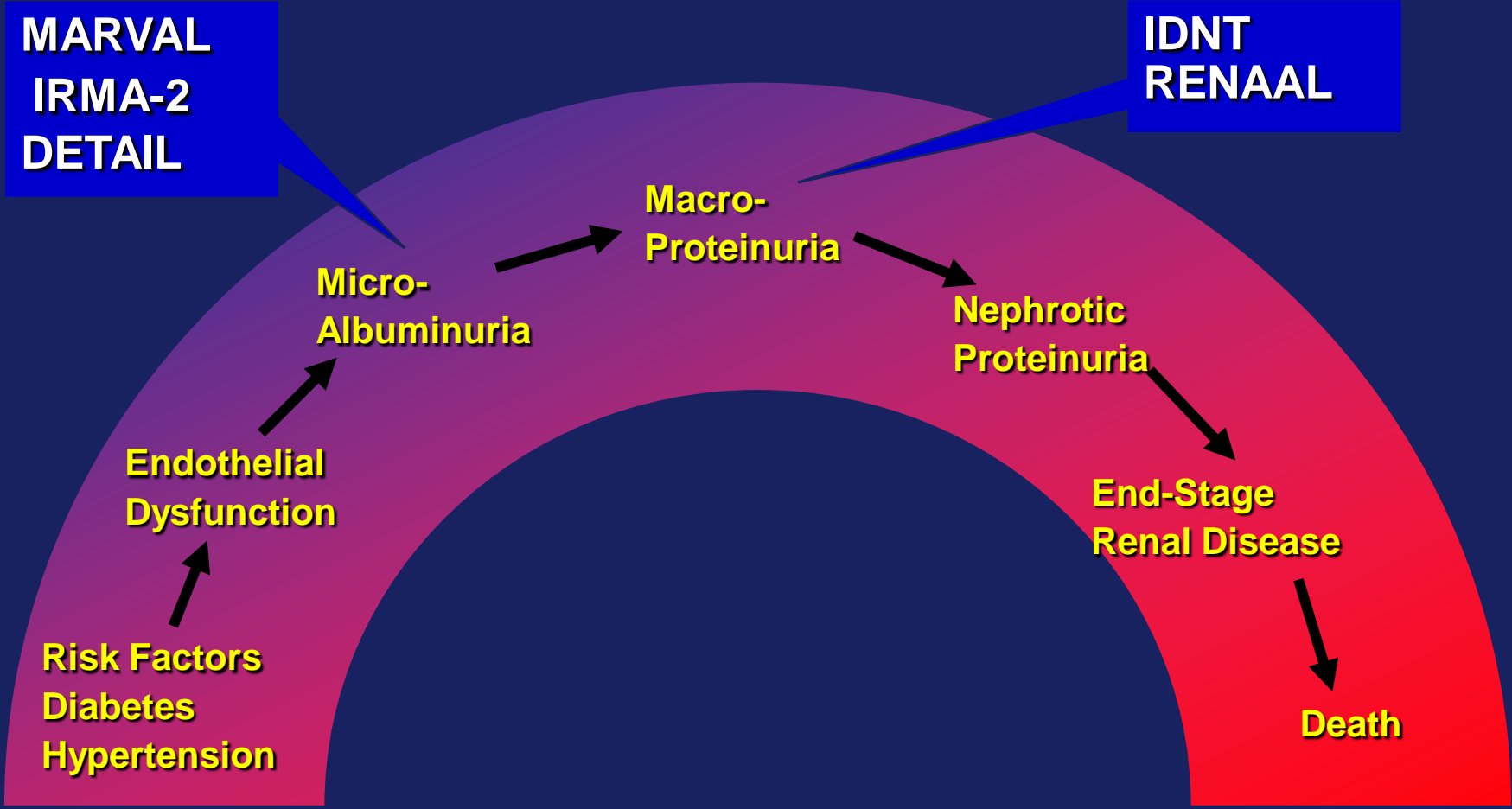
Gojaseni et al. Thai SEEK group. Unpublished data.

Diabetic Kidney Disease Landmark Renal Outcome Trial of ACEIs



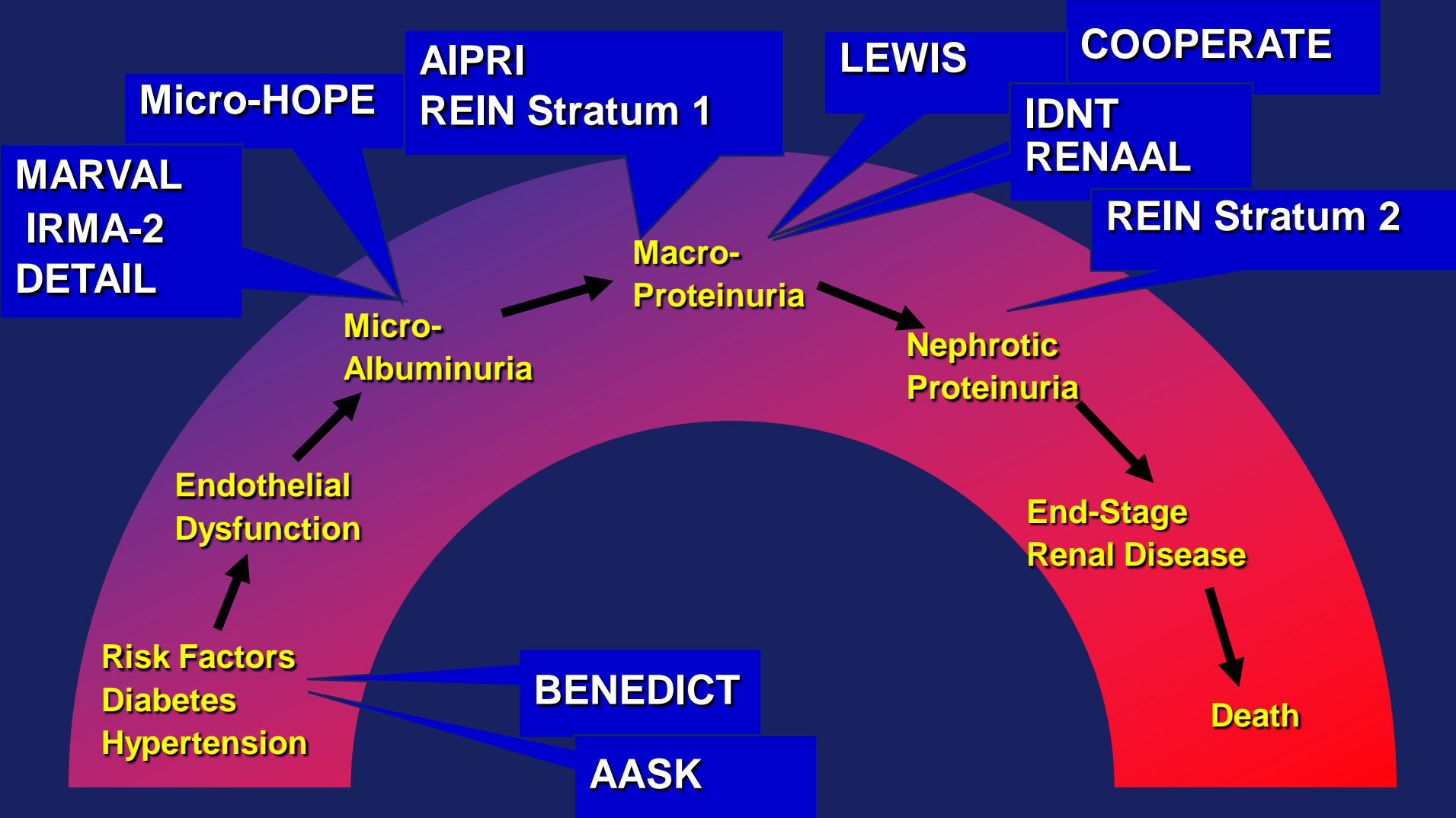
Adapted from Burgess

Diabetic Kidney Disease Landmark Renal Outcome Trial of ARBs



Adapted from Burgess

Summary: Chronic Kidney Disease Landmark Renal Outcome Trial of ACEIs/ARBs



Adapted from Burgess

IRMA 2

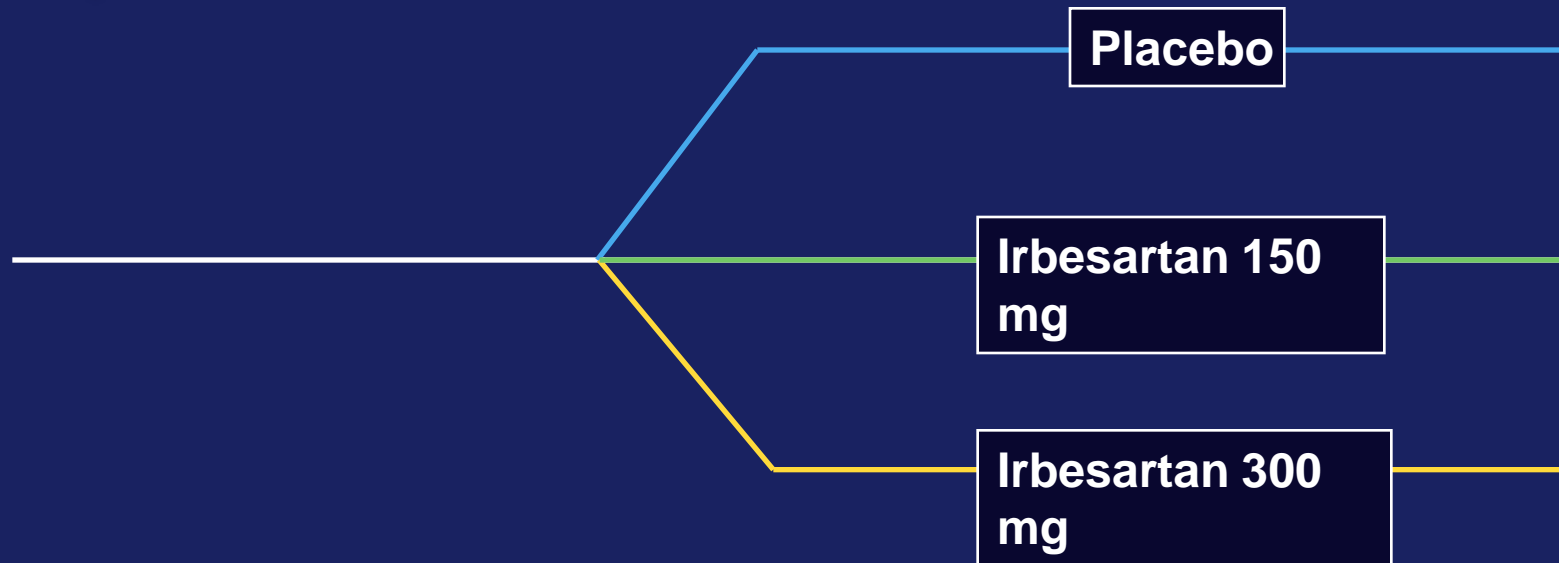
Study design

590 patients with type 2 diabetes,
MAU (albumin excretion rate 20 – 200 mg/min),
normal renal function, and hypertension

Follow-up: 2 years

Screening/Enrollment
Up to 5 weeks

Double-blind
Treatment

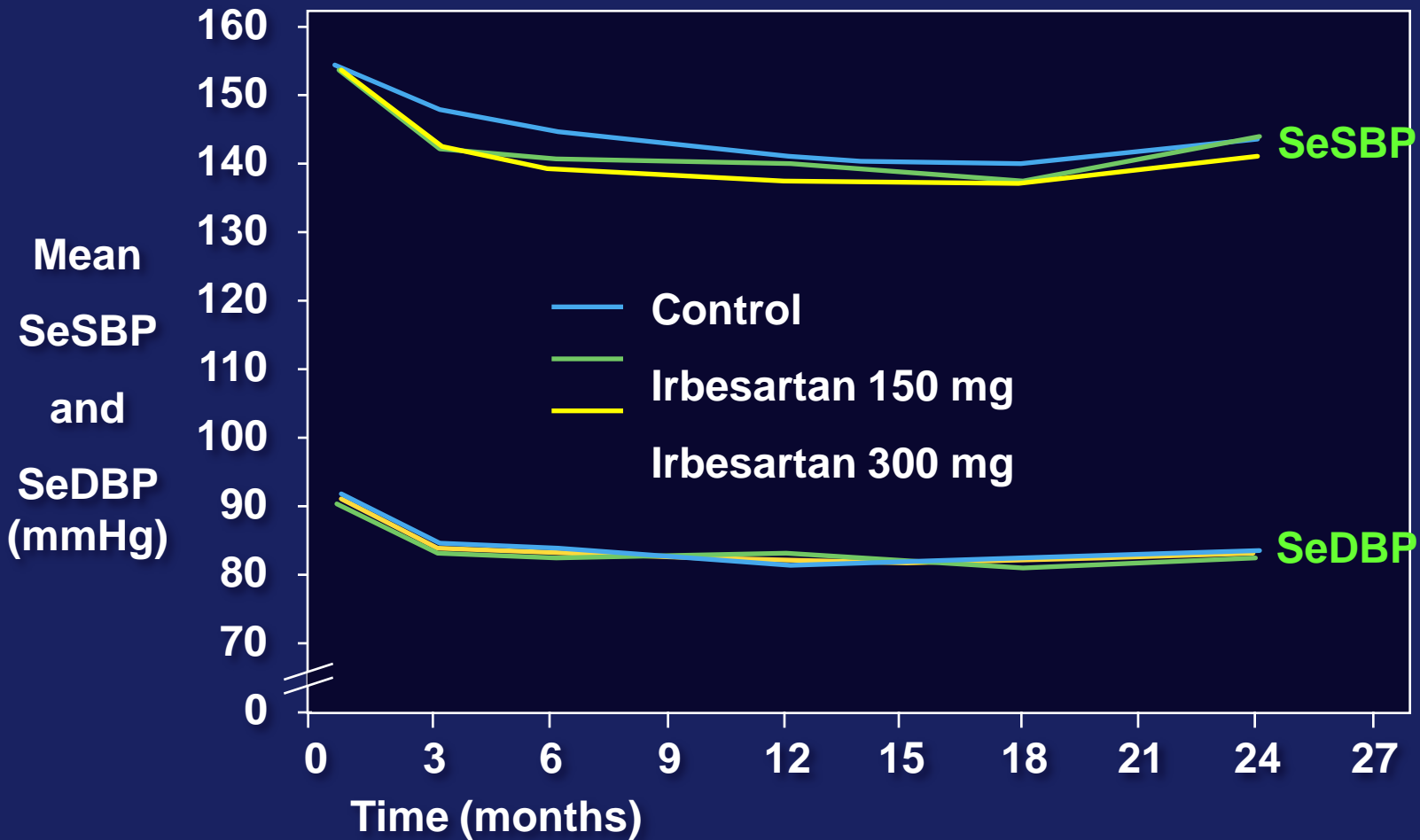


* Adjunctive antihypertensive therapies (excluding ACE inhibitors, angiotensin II receptor antagonists, and dihydropyridine calcium channel blockers) could be added to all groups to help achieve equal blood pressure levels.

Parving H-H et al. *N Engl J Med* 2001;345:870–8.

IRMA 2

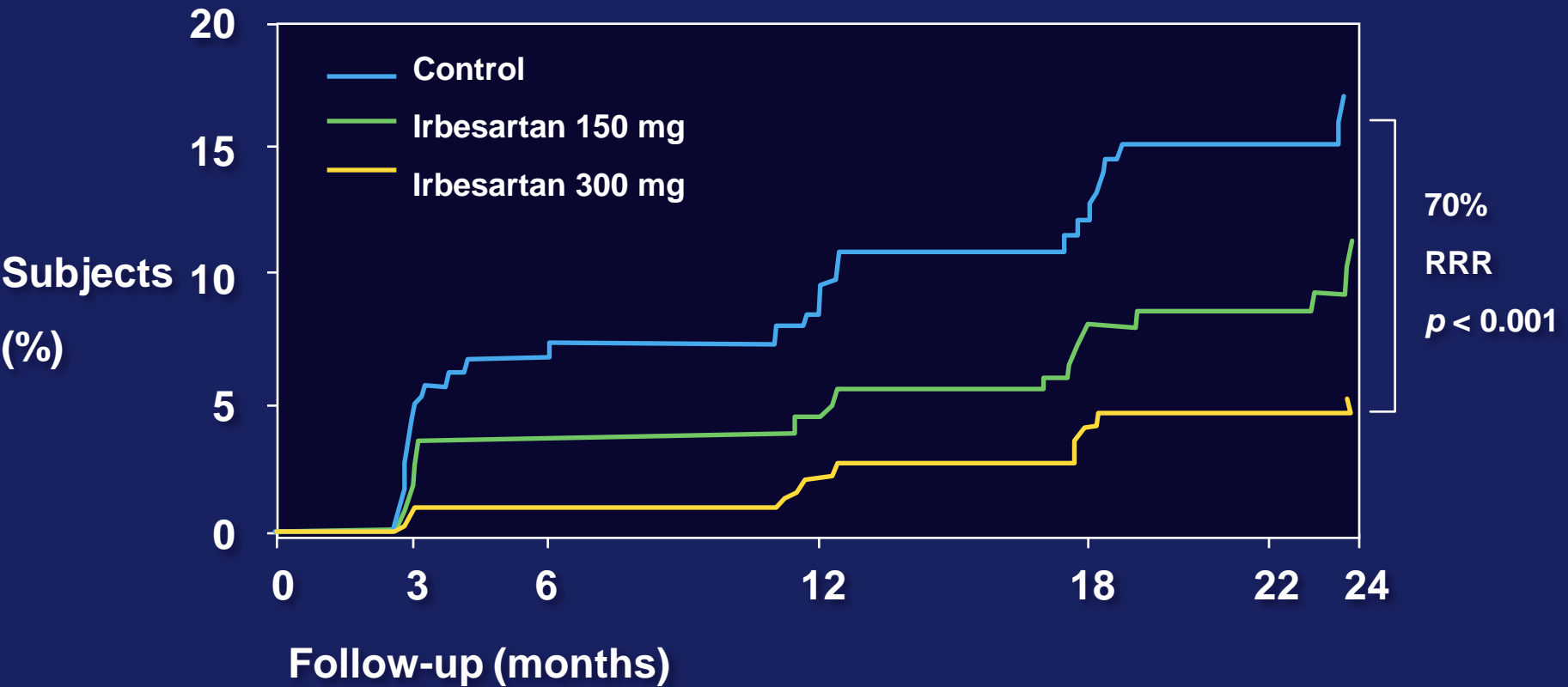
Blood pressure response



Concomitant antihypertensive agents received by 56% of patients in the control group, 45% in the irbesartan 150 mg group, and 43% in the irbesartan 300 mg group

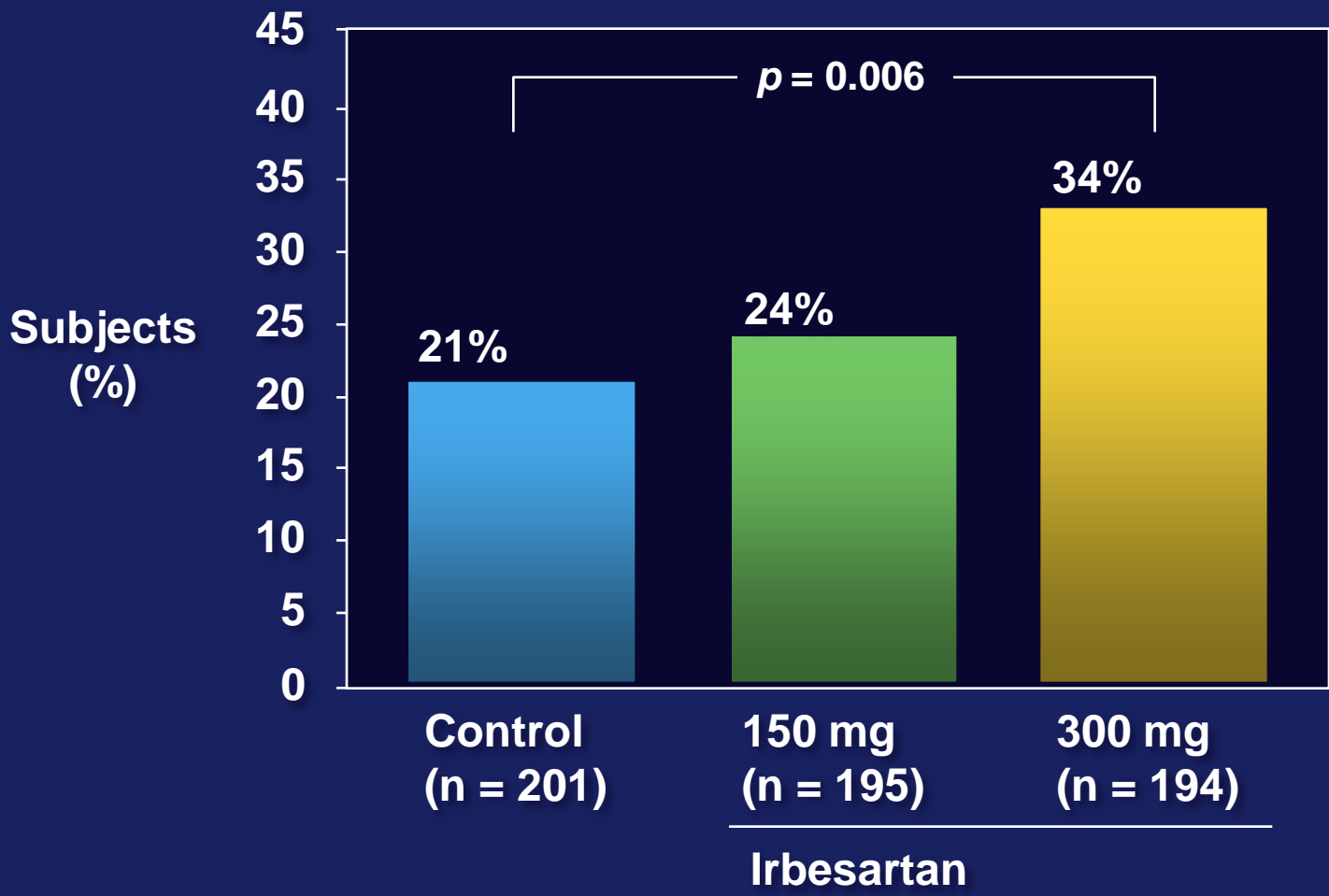
IRMA 2

Primary endpoint: Time to overt proteinuria



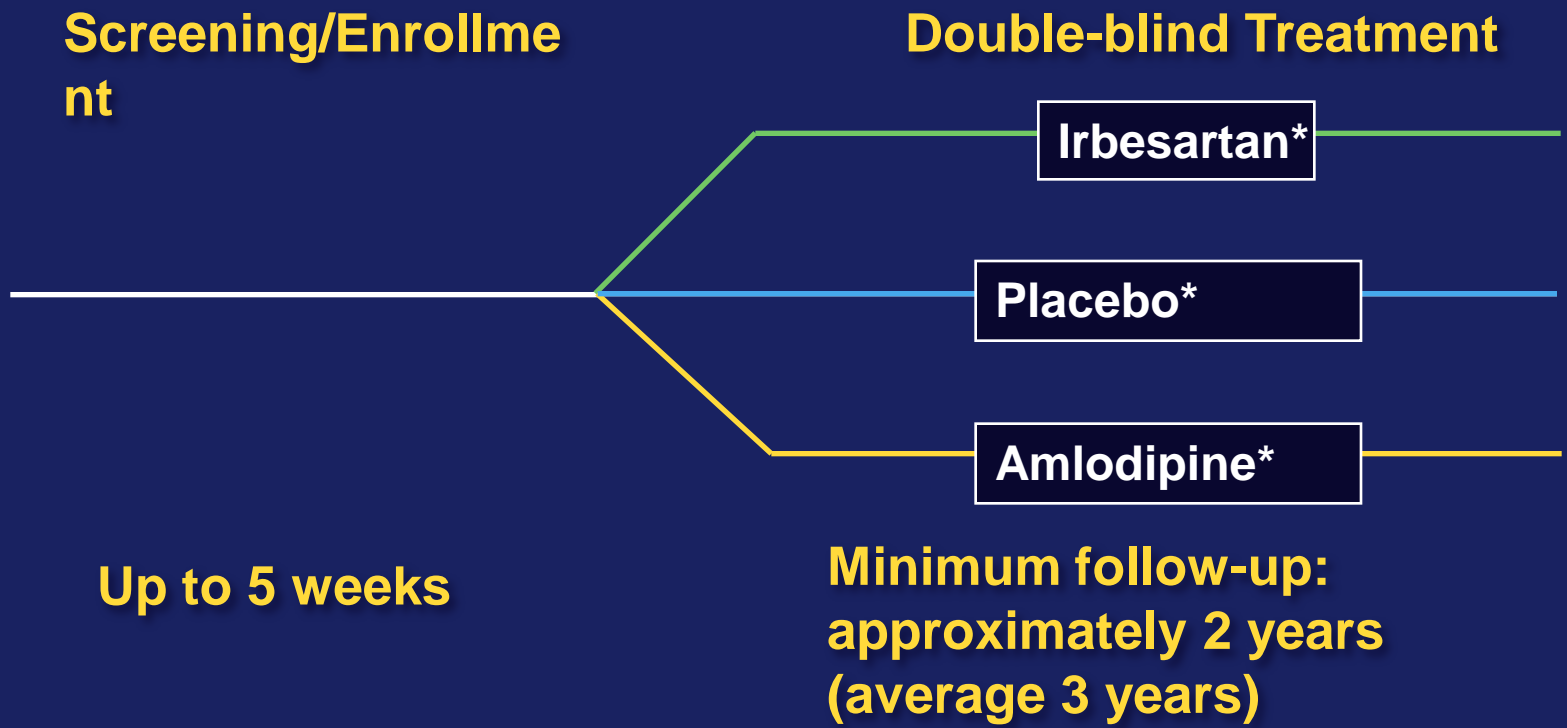
IRMA 2

Normalization of Urinary Albumin Excretion Rate



IDNT Study design

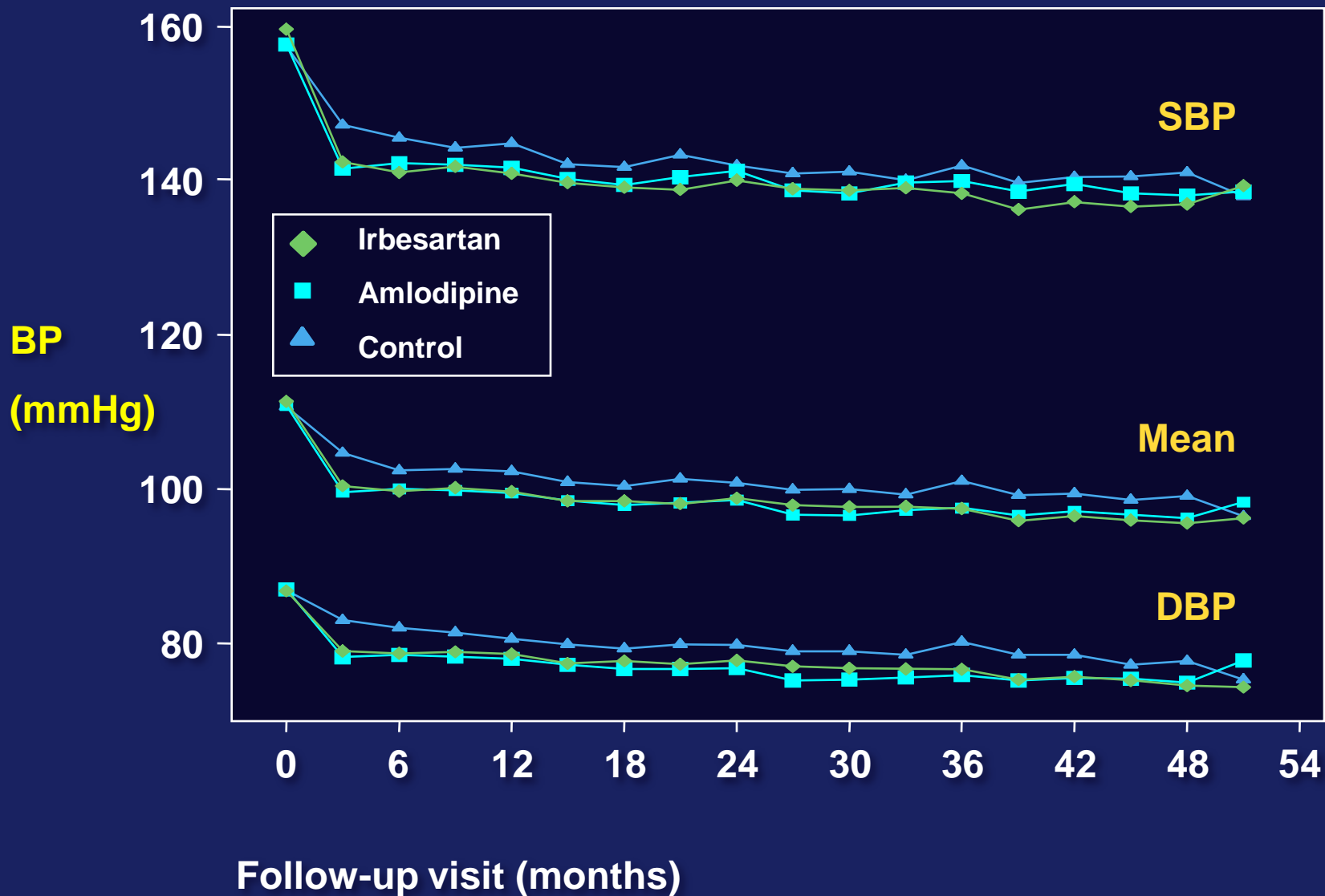
1,715 patients with type 2 diabetes, proteinuria > 900 mg/d, and hypertension



* Adjunctive antihypertensive therapies (excluding ACE inhibitors, angiotensin II receptor antagonists, and calcium channel blockers) added to each arm to achieve equal blood pressure reduction

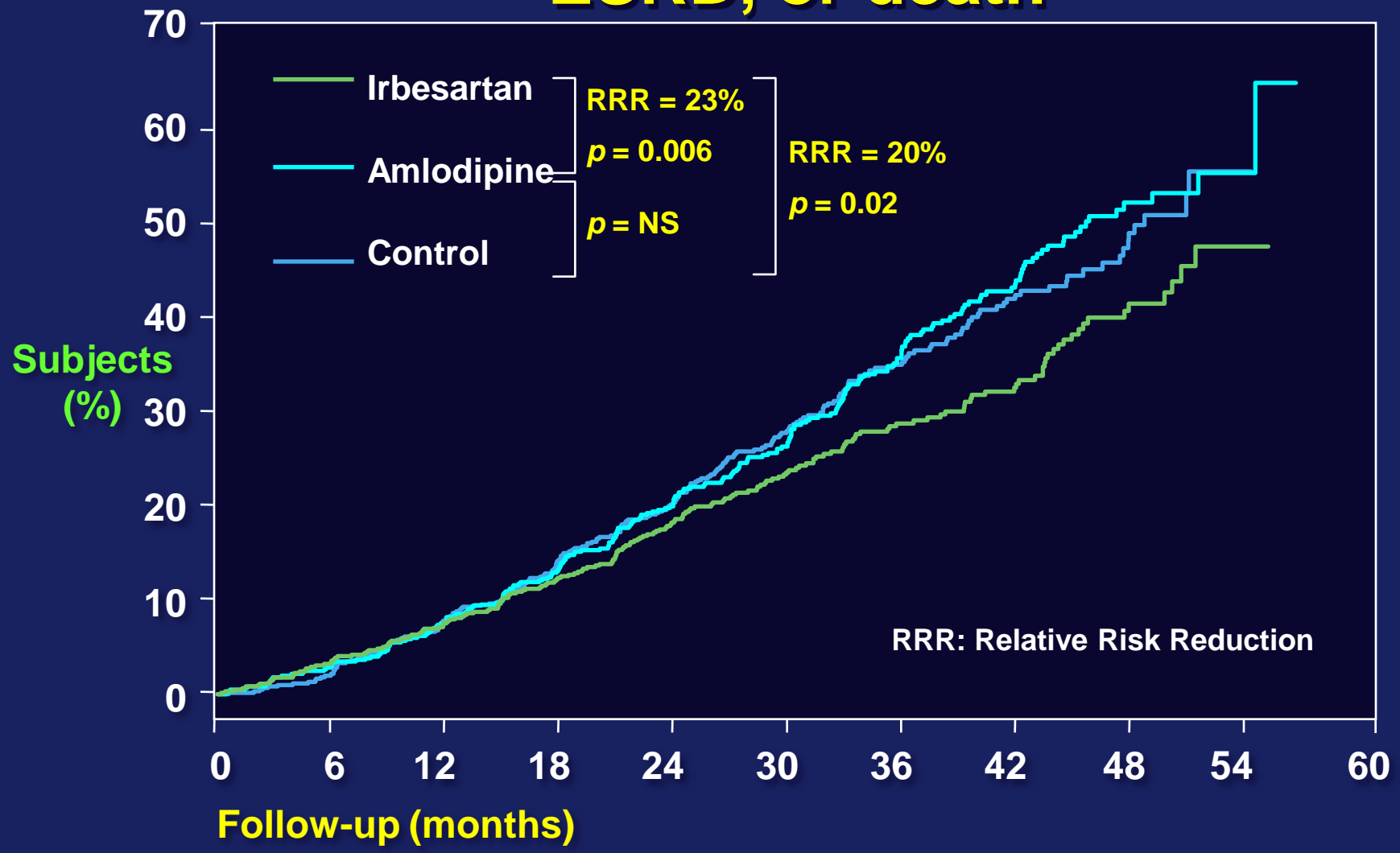
IDNT

Systolic, mean, and diastolic BP response



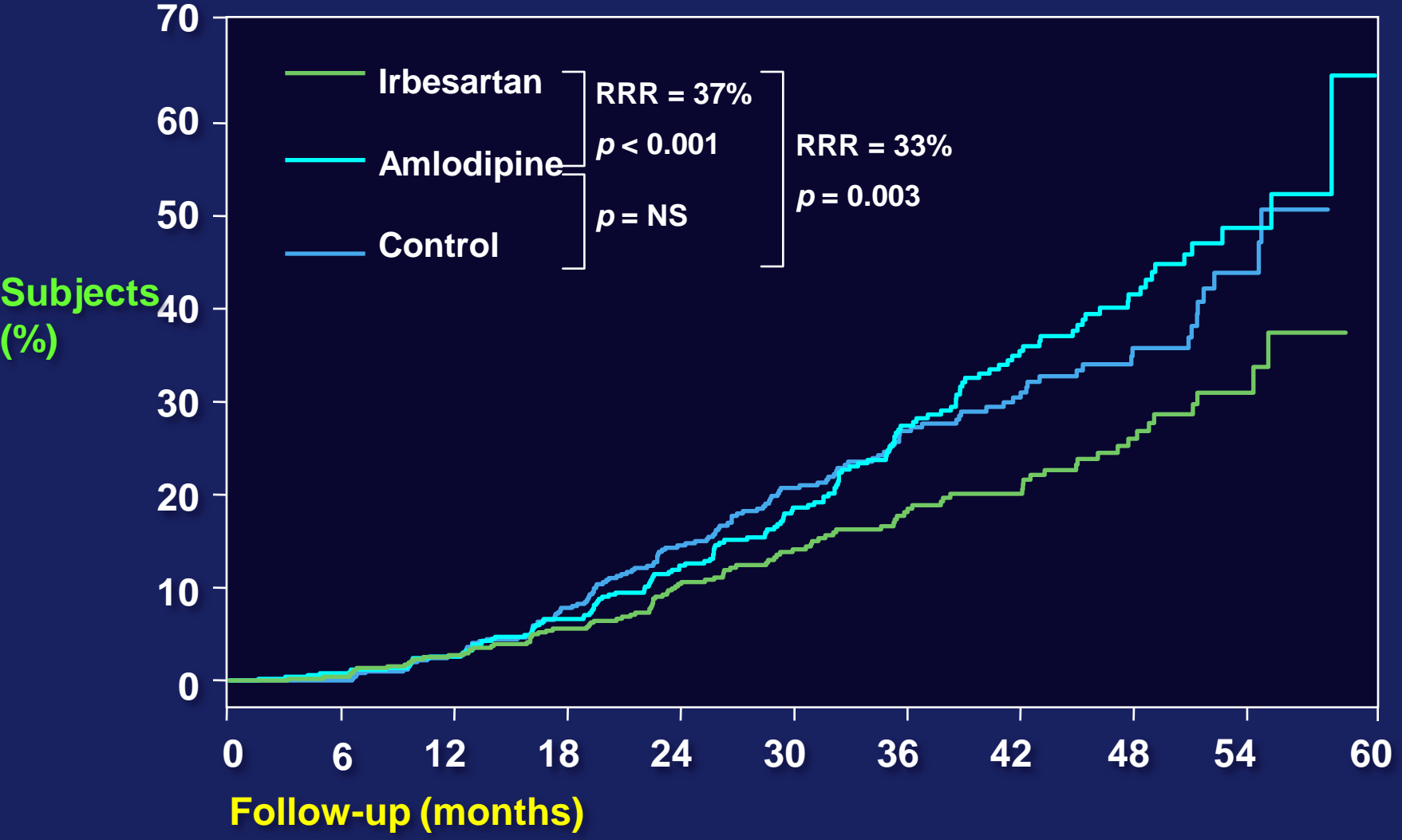
IDNT primary endpoint

Time to doubling of serum creatinine, ESRD, or death

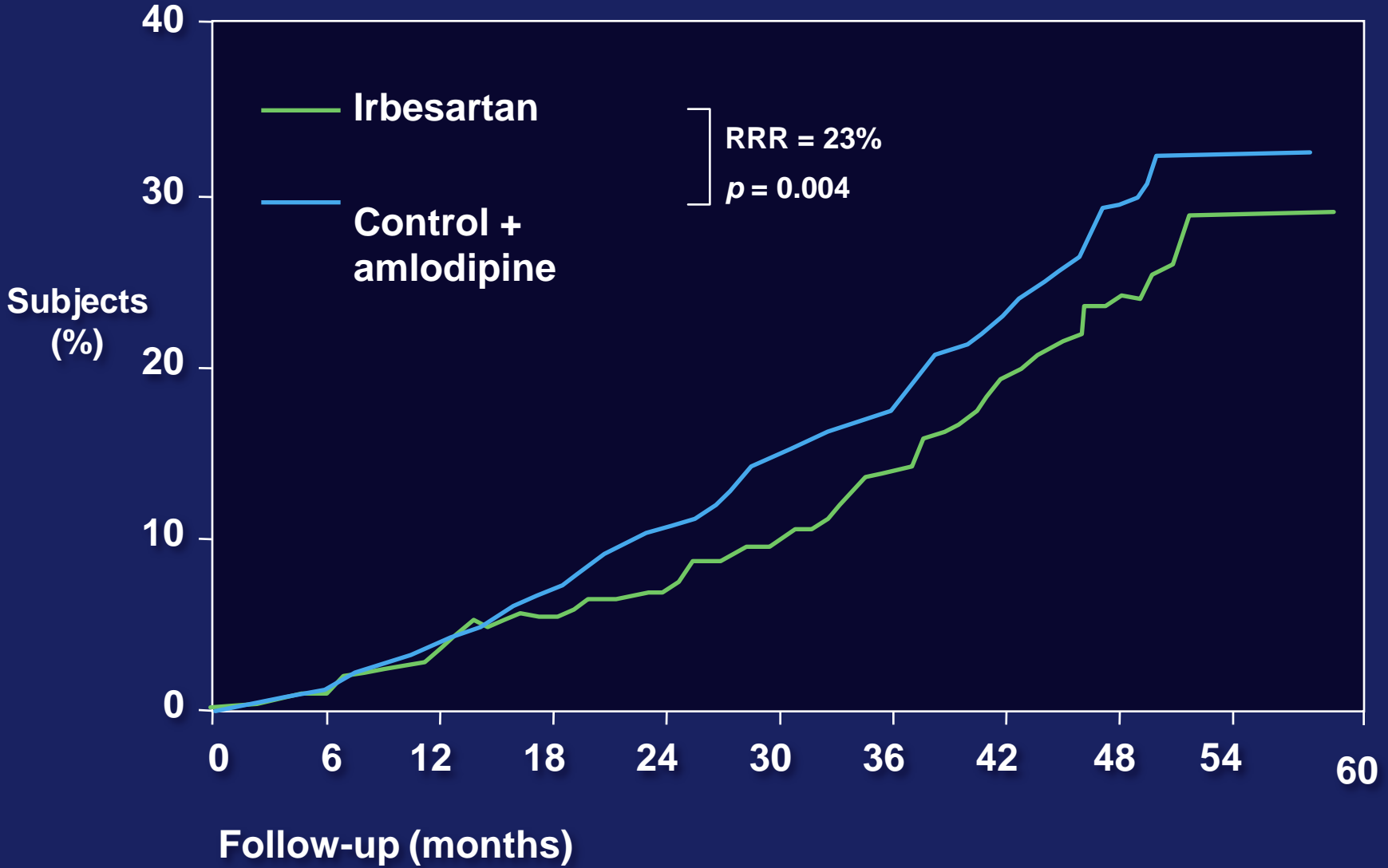


IDNT

Time to doubling of serum creatinine



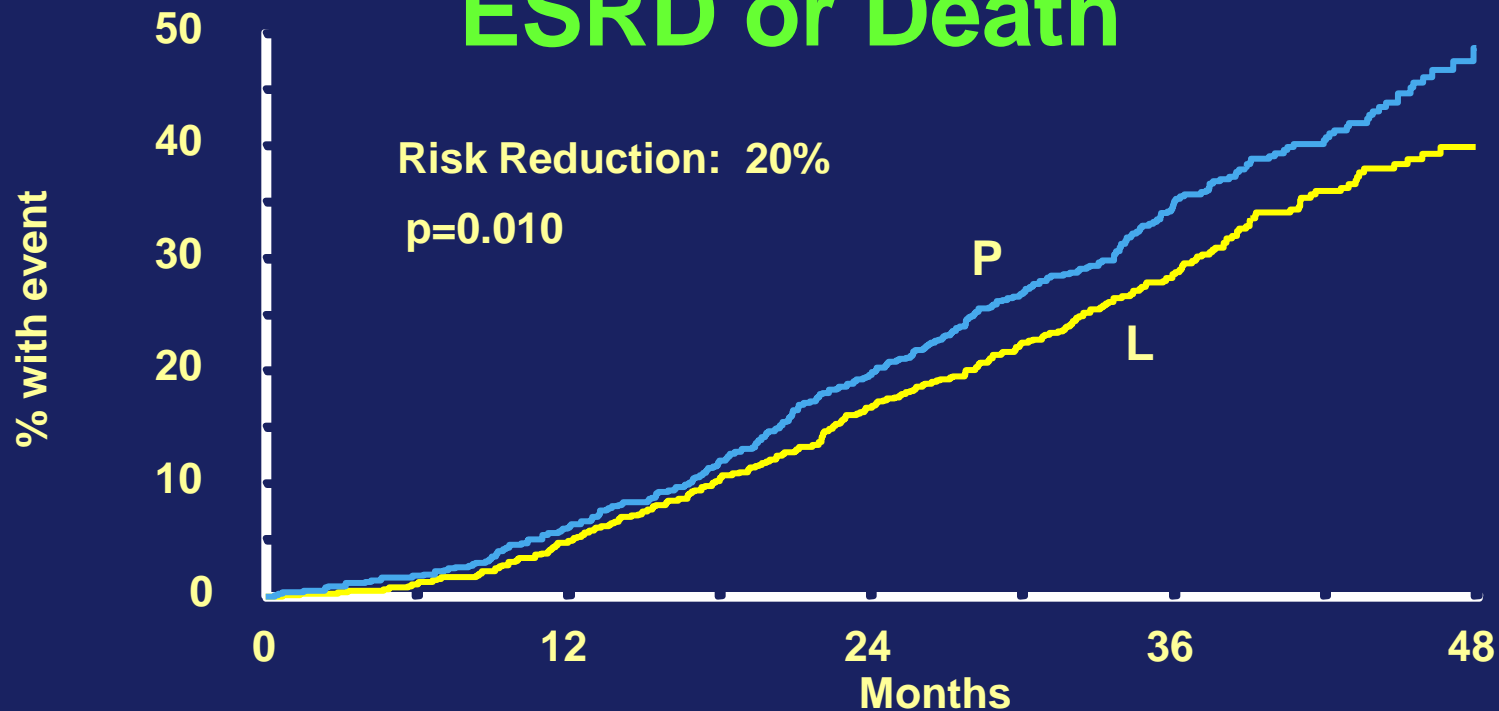
IDNT Time to ESRD



RENAAL: Reduction of Endpoint in NIDDM with the Angiotensin II Antagonist Losartan

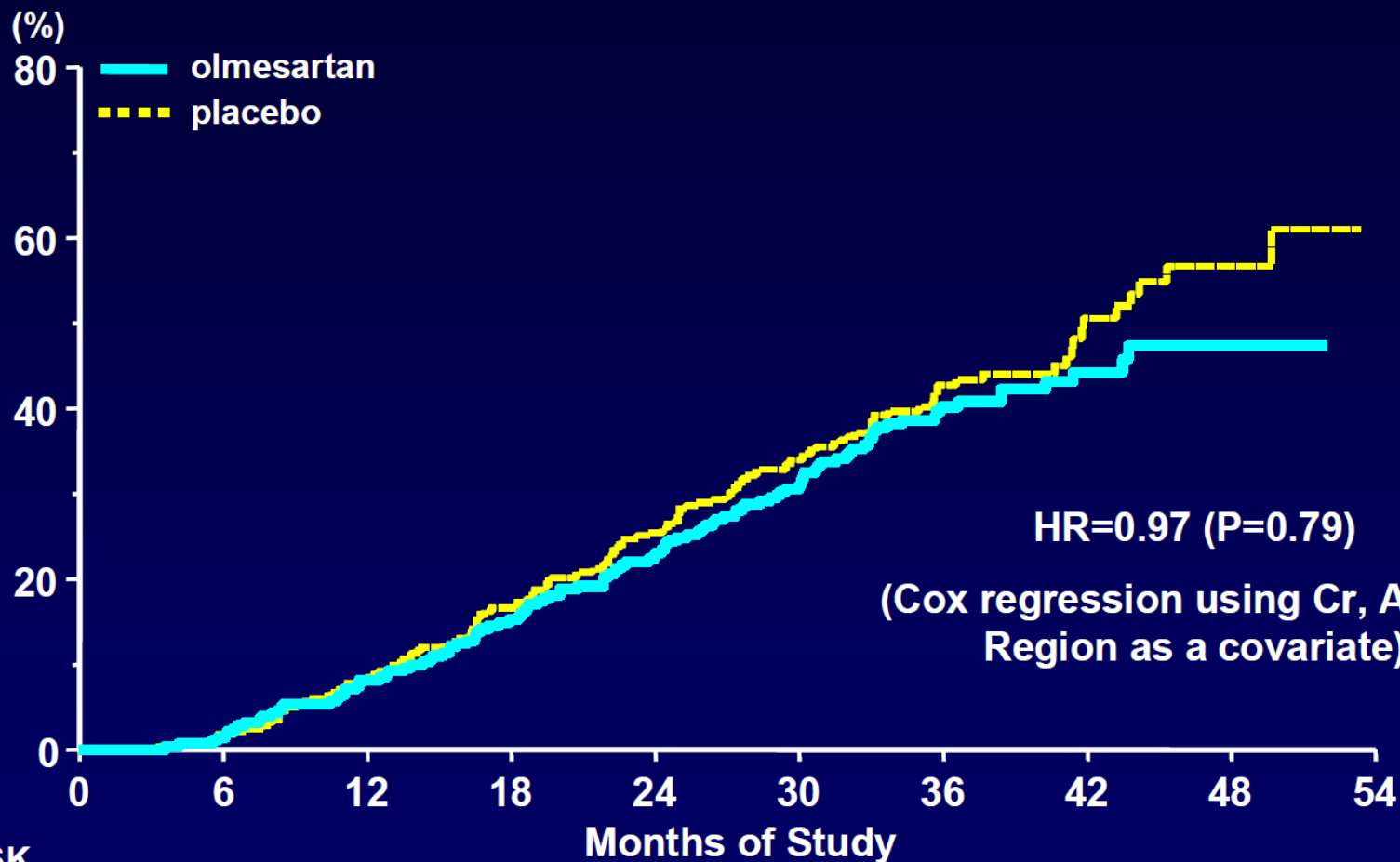
1513 Patients with type 2 diabetes, hypertension and macroproteinuria

ESRD or Death



Months	0	12	24	36	48
P (+ CT)	762	715	610	347	42
L (+ CT)	751	714	625	375	69

Kaplan-Meier Curves of Primary Composite Renal Outcome



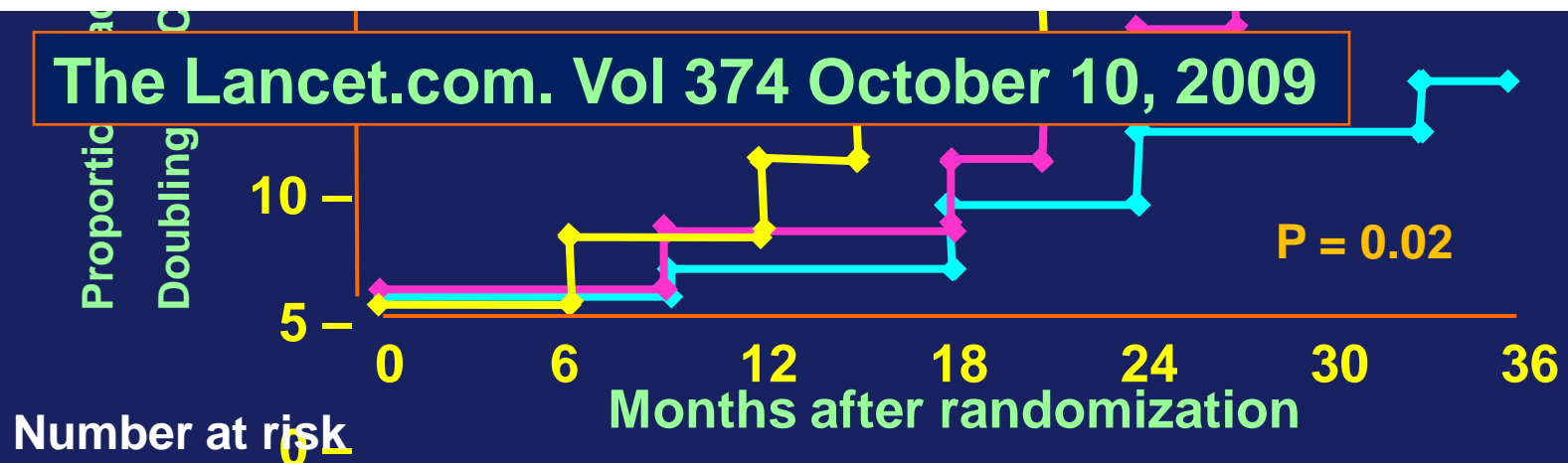
NO. AT RISK

olmesartan	282	278	259	238	217	184	107	44	17
placebo	284	279	259	236	211	176	102	41	17

COOPERATE

Combination treatment of angiotensin-II receptor blocker and angiotensin-converting-enzyme inhibitor in non-diabetic renal disease

Retraction—Combination treatment of angiotensin-II receptor blocker and angiotensin-converting-enzyme inhibitor in non-diabetic renal disease (COOPERATE): a randomised controlled trial



Number at risk

Losatan	89	88	84	79	65	59	47
Trandolapril	86	85	83	75	72	63	58
Combination	88	87	86	83	76	73	67

ONTARGET Renal Outcome

	Ramipril n (%)	Telmisartan n (%)	Ramipril+ telmisartan n (%)	Telmisartan vs ramipril HR (95% CI)	p	Ramipril+ telmisartan vs ramipril HR (95% CI)	p
All dialysis, doubling, death	1150 (13.4)	1147 (13.4)	1233 (14.5)	1.00 (0.92-1.09)	0.968	1.09 (1.01-1.18)	0.037
All dialysis and doubling	174 (2.03)	189 (2.21)	212 (2.49)	1.09 (0.89-1.34)	0.420	1.24 (1.01-1.51)	0.038
Acute dialysis	133						
Acute dialysis	144						
Doubling	140 (1.63)	155 (1.81)	166 (1.95)	1.11 (0.88-1.39)	0.378	1.20 (0.96-1.50)	0.110
Acute dialysis	13 (0.15)	20 (0.23)	28 (0.33)	1.55 (0.77-3.11)	0.221	2.19 (1.13-4.22)	0.020
Chronic dialysis	33 (0.39)	31 (0.36)	34 (0.40)	0.94 (0.58-1.54)	0.817	1.05 (0.65-1.69)	0.854

No proven benefit of dual blockade in both diabetic and non-diabetic kidney disease

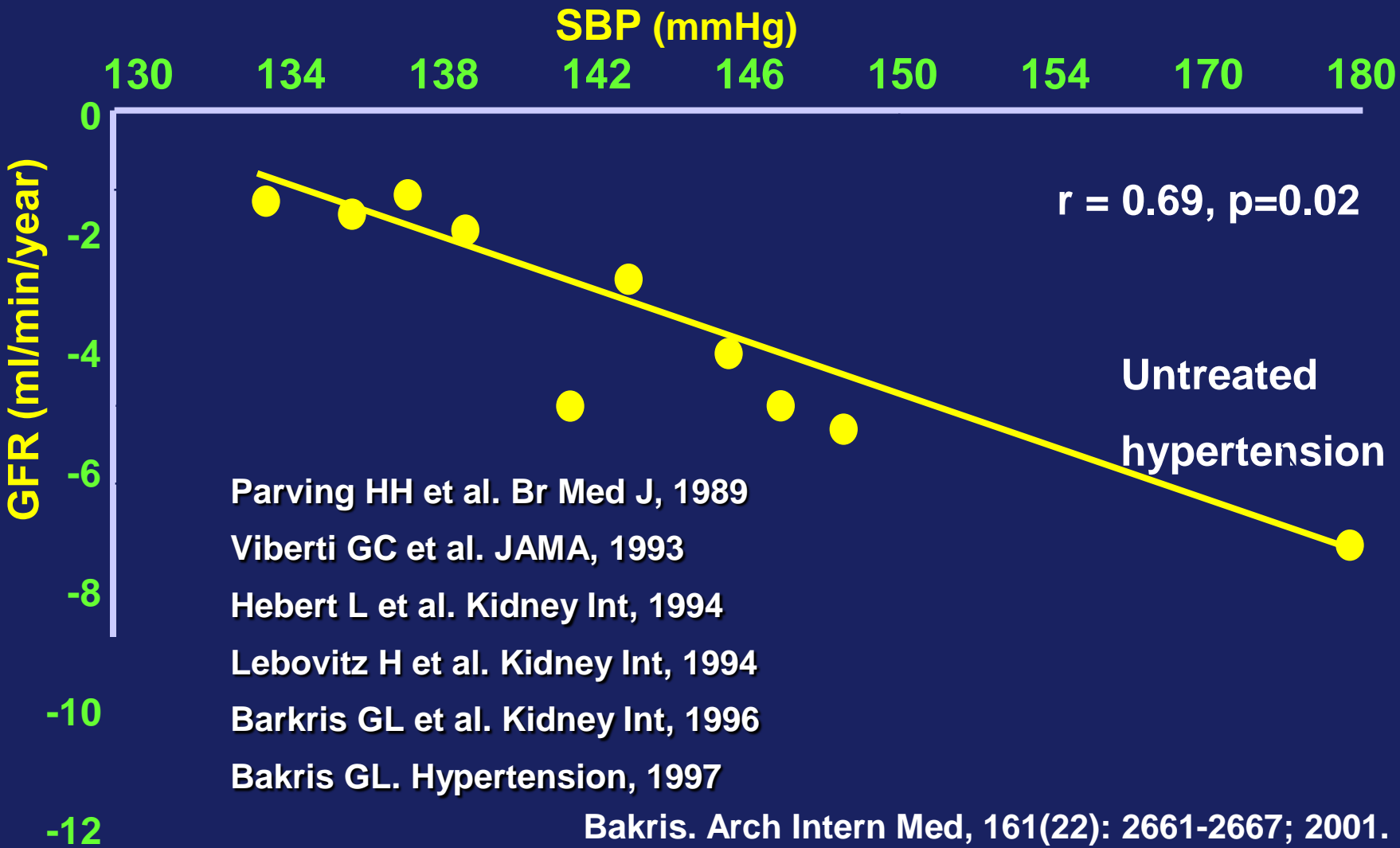
Dialysis—at least one dialysis. Chronic dialysis—more than 2 months. Acute dialysis—2 months or less. Doubling—doubling of serum creatinine from baseline values. HR—hazard ratio. Reasons for acute dialysis were reported as severe infection (n=22), volume depletion (n=9), post-surgery (n=7), drugs (n=5), specific renal diseases (n=5), and other reasons (n=23). In three of 165 originally reported cases of dialysis,⁶ detailed analysis revealed that no dialysis took place. In three of the 162 cases of dialysis, we got no information on duration of dialysis. Investigators could report several reasons for acute dialysis.

Table 2: Incidence of primary and secondary renal outcomes and of its components

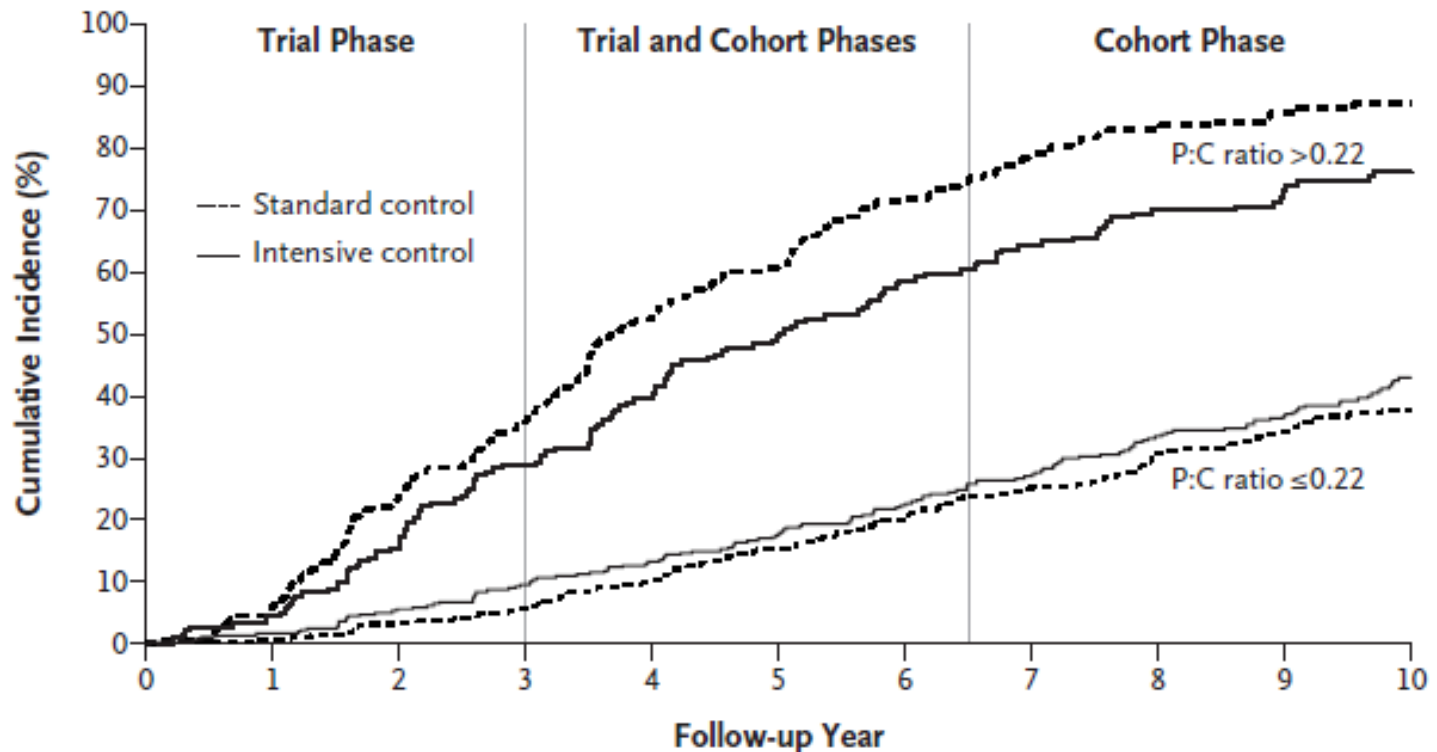


**KDIGO Clinical Practice Guideline for the Management of Blood Pressure
in Chronic Kidney Disease**

Rates of Decline in GFR vs SBP in Type 2 DM and CKD in RCT Extending ≥ 3 Years



Intensive Blood-Pressure control in Hypertensive Chronic Kidney Disease: AASK Follow-up Data



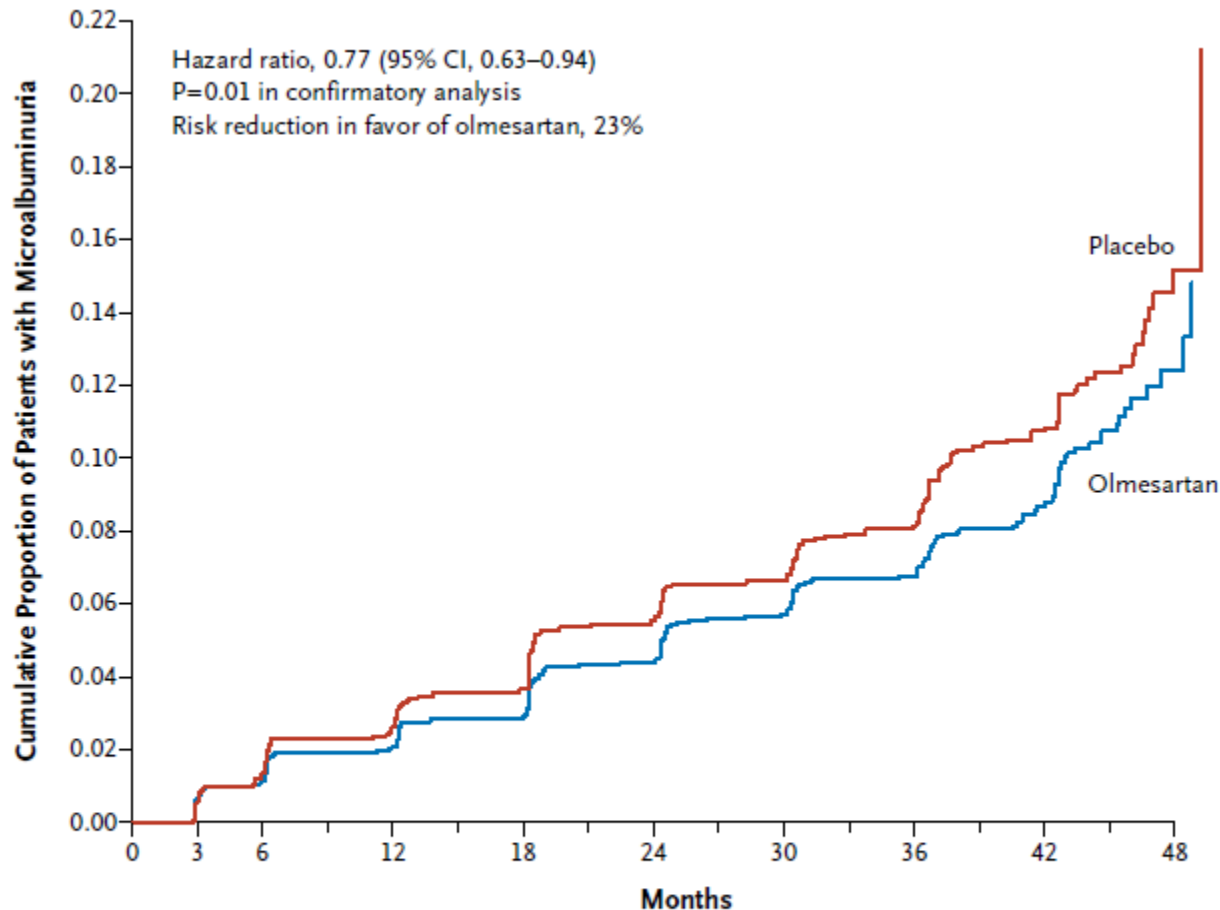
P:C Ratio >0.22

Standard control	176	165	134	113	81	66	45	32	26	22	13
Intensive control	181	172	151	128	109	87	67	56	47	40	25

P:C Ratio ≤0.22

Standard control	376	373	362	353	332	302	267	234	214	196	128
Intensive control	357	350	335	321	306	282	254	228	206	189	128

Olmesartan for the Delay or Prevention of Microalbuminuria in Type 2 Diabetes.



No. at Risk

Olmesartan	2160	2097	2025	1923	1833	1727	1629	1325	754	67
Placebo	2139	2076	2004	1887	1787	1685	1592	1308	699	49

Olmesartan for the Delay or Prevention of Microalbuminuria in Type 2 Diabetes.

Table 2. Secondary Efficacy End Points during the Double-Blind Treatment Period.*

End Point	Olmesartan (N= 2232)	Placebo (N= 2215)	Hazard Ratio (95% CI)	P Value
	<i>no. of patients (%)</i>			
Composite of cardiovascular complications or death from cardiovascular causes	96 (4.3)	94 (4.2)	1.00 (0.75–1.33)	0.99
Composite of death from any cause	26 (1.2)	15 (0.7)	1.70 (0.90–3.22)	0.10
Death from cardiovascular causes	15 (0.7)	3 (0.1)		
Death not related to cardiovascular causes	8 (0.4)	10 (0.5)		
Death from unknown cause	3 (0.1)	2 (0.1)		
Composite of death from cardiovascular causes	15 (0.7)	3 (0.1)	4.94 (1.43–17.06)	0.01
Sudden cardiac death	7 (0.3)	1 (<0.1)		
Death due to fatal myocardial infarction	5 (0.2)	0		
Evidence of recent myocardial infarction on autopsy	0	0		
Death due to congestive heart failure	0	0		
Death during or after percutaneous transluminal coronary angioplasty or CABG	1 (<0.1)	0		
Death due to fatal stroke	2 (0.1)	2 (0.1)		
Composite of cardiovascular complications, excluding new-onset atrial fibrillation and transient ischemic attack	63 (2.8)	71 (3.2)	0.87 (0.62–1.22)	0.42
Composite of new-onset atrial fibrillation or transient ischemic attack	19 (0.9)	28 (1.3)	0.67 (0.37–1.19)	0.17
Composite of all cardiovascular complications	81 (3.6)	91 (4.1)	0.87 (0.65–1.18)	0.37

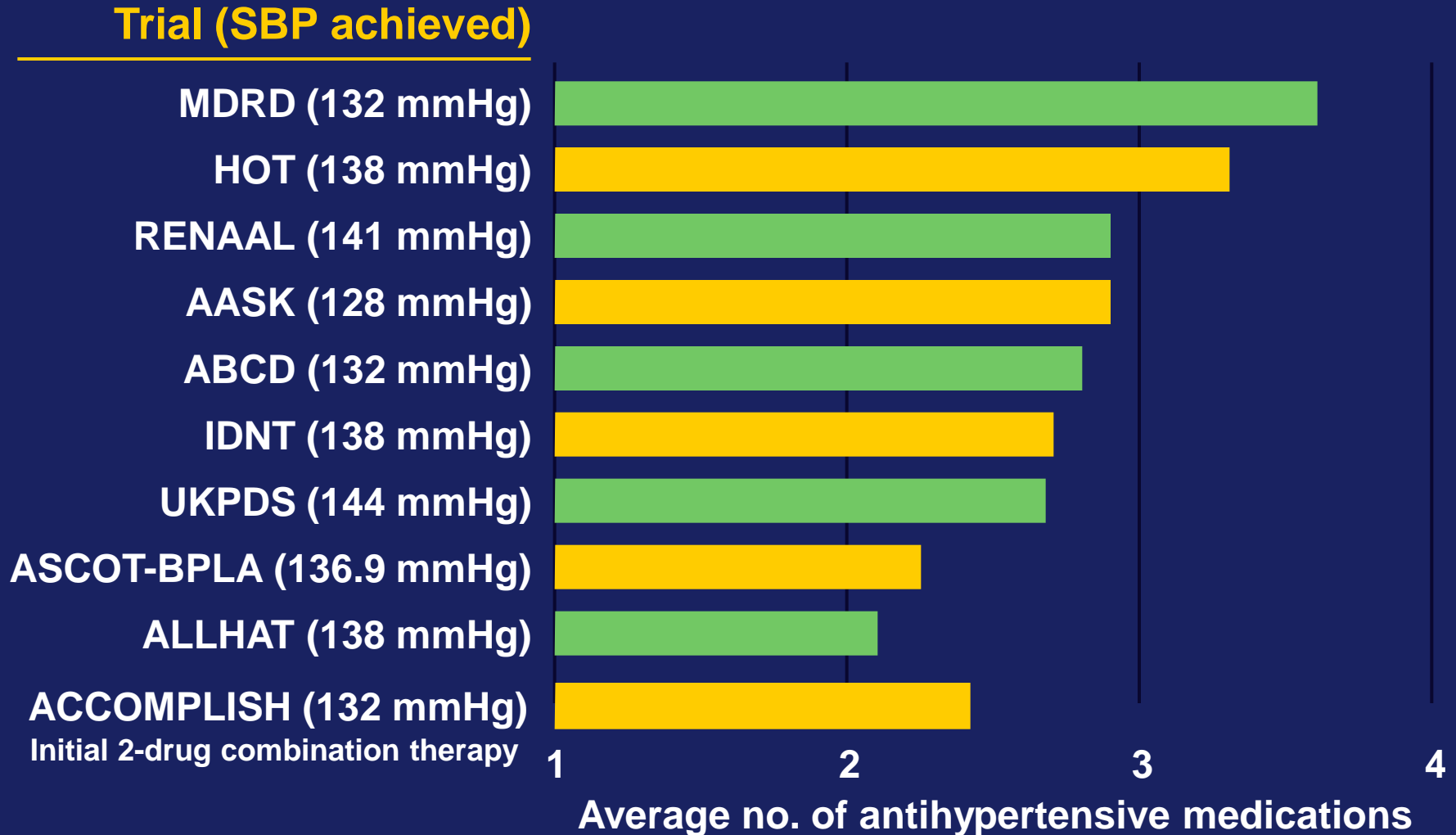
Blood Pressure Management in CKD ND Patients with Diabetes Mellitus

Albuminuria (mg/day)	BP Target (mmHg)	Preferred Agents
< 30	≤ 140/90 (1B)	None
30 - 300	≤ 130/80 (2D)	ARB or ACE-I (2D)
> 300	≤ 130/80 (2D)	ARB or ACE-I (1B)

Blood Pressure Management in CKD ND Patients without Diabetes Mellitus

Albuminuria (mg/day)	BP Target (mmHg)	Preferred Agents
< 30	$\leq 140/90$ (1B)	None
30 - 300	$\leq 130/80$ (2D)	ARB or ACE-I (2D)
> 300	$\leq 130/80$ (2D)	ARB or ACE-I (1B)

Multiple Antihypertensive Agents are Needed to Reach BP Goal



Bakris et al. Am J Med 2004;116(5A):30S–8; Dahlöf et al. Lancet 2005;366:895–906
 Jamerson et al. Blood Press 2007;16:80–6; Jamerson et al. N Engl J Med 2008;359:2417–28

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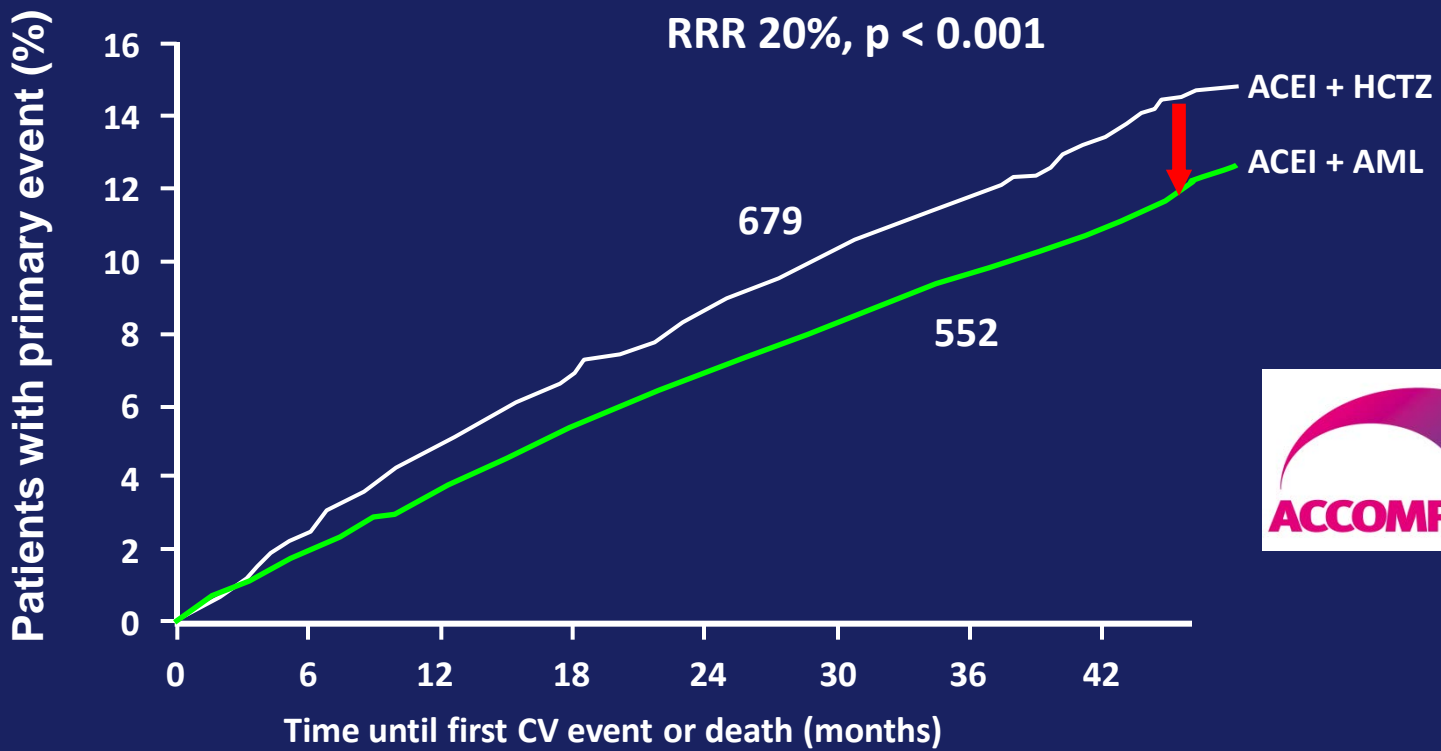
DECEMBER 4, 2008

VOL. 359 NO. 23

Benazepril plus Amlodipine or Hydrochlorothiazide
for Hypertension in High-Risk Patients

Kenneth Jamerson, M.D., Michael A. Weber, M.D., George L. Bakris, M.D., Björn Dahlöf, M.D., Bertram Pitt, M.D., Victor Shi, M.D., Allen Hester, Ph.D., Jitendra Gupte, M.S., Marjorie Gatlin, M.D., and Eric J. Velazquez, M.D.,
for the ACCOMPLISH trial investigators*

ACCOMPLISH Main endpoint (cardiovascular events/death)
Benazepril + Amlodipine vs. Benazepril + HCTZ in high-risk patients



No. at risk

ACEI + AML	5512	5317	5141	4959	4739	2826	1447
ACEI + HCTZ	5483	5274	5082	4892	4655	2749	1390

RRR, relative risk reduction; ACEI, angiotensin converting enzyme inhibitor;
 AML, amlodipine; HCTZ, hydrochlorothiazide

Jamerson et al. *N Engl J Med* 2008;359:2417–28

Renal outcomes with different fixed-dose combination therapies in patients with hypertension at high risk for cardiovascular events (ACCOMPLISH): a prespecified secondary analysis of a randomised controlled trial

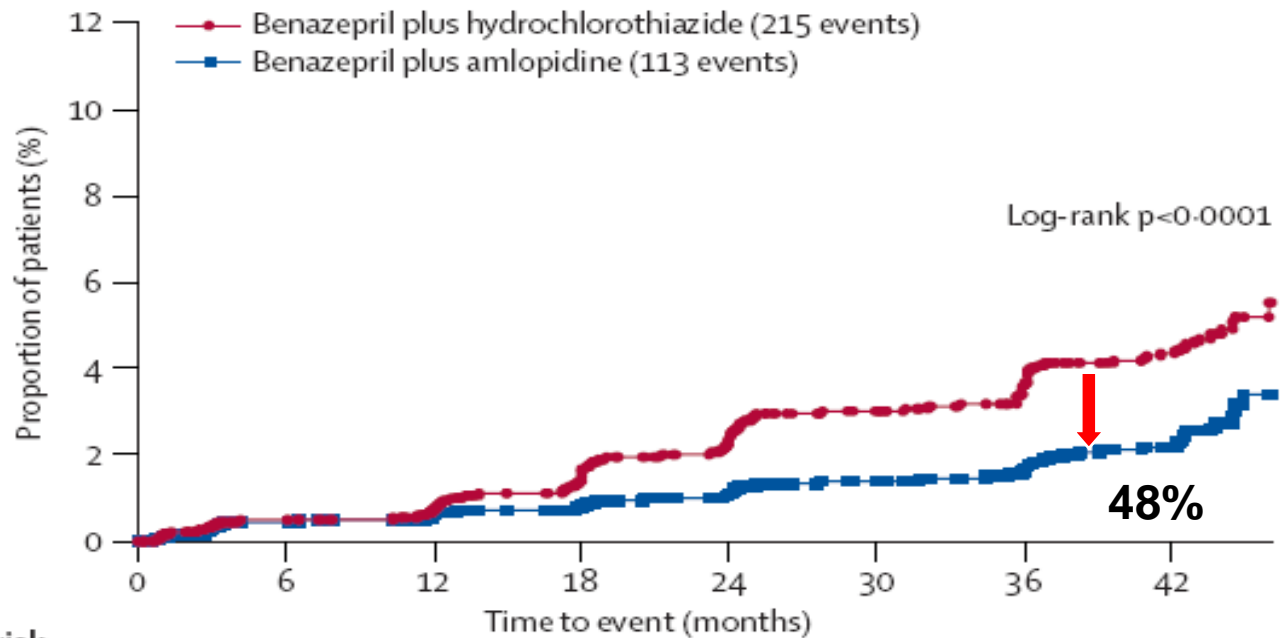


*George L Bakris, Pantelis A Sarafidis, Matthew R Weir, Björn Dahlöf, Bertram Pitt, Kenneth Jamerson, Eric J Velazquez, Linda Staikos-Byrne, Roxzana Y Kelly, Victor Shi, Yann-Tong Chiang, Michael A Weber, for the ACCOMPLISH Trial investigators**

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CKD progression

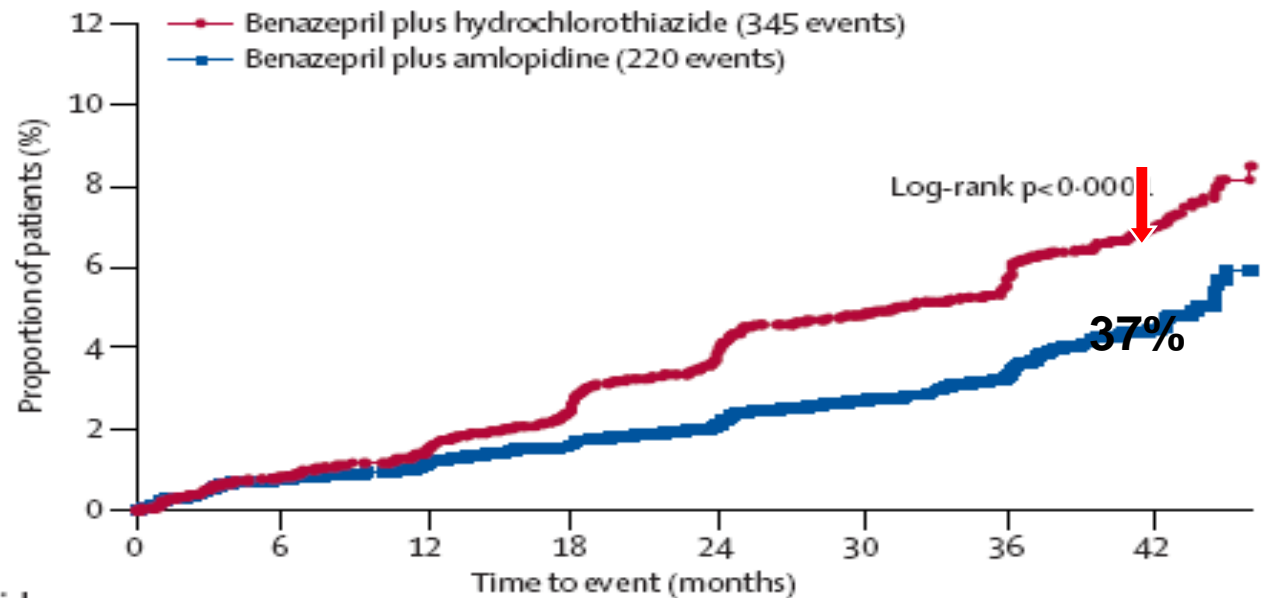
- Fewer chronic kidney disease events in the **benazepril plus amlodipine** group



Number at risk	0	6	12	18	24	30	36	42
Benazepril plus hydrochlorothiazide	5762	5576	5459	5307	5139	4936	2956	1506
Benazepril plus amlodipine	5744	5578	5452	5336	5203	5022	3016	1559

CKD progression + CV Death

- Fewer combined cardiovascular deaths and chronic kidney disease events in the benazepril plus amlodipine group



Number at risk	0	6	12	18	24	30	36	42
Benazepril plus hydrochlorothiazide	5762	5576	5459	5307	5139	4936	2956	1506
Benazepril plus amlodipine	5744	5578	5452	5336	5203	5022	3016	1559

ACEIs & ARBs in Thailand

ACEI	ARB
Enalapril	Losartan
Captopril	Irbesartan
Lisinopril	Valsartan
Ramipril	Candesartan
Quinapril	Telmisartan
Perindopril	Olmesartan
Imidapril	

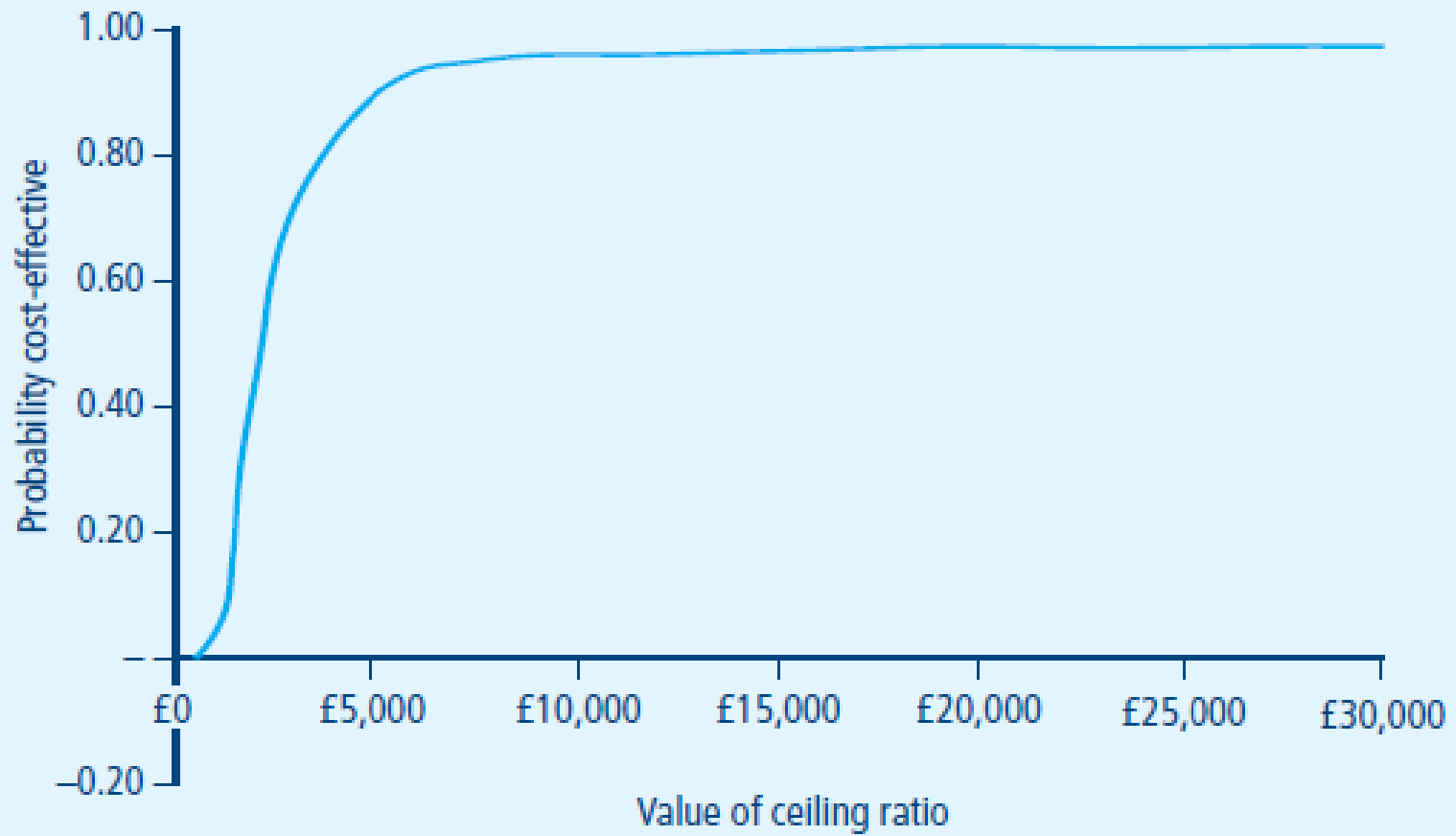
Cost-effectiveness Analysis: ICERs

$$\text{CE ratio} = \frac{\text{cost}_{\text{new strategy}} - \text{cost}_{\text{current practice}}}{\text{effect}_{\text{new strategy}} - \text{effect}_{\text{current practice}}}$$

Figure 7 Cost-effectiveness Matrix



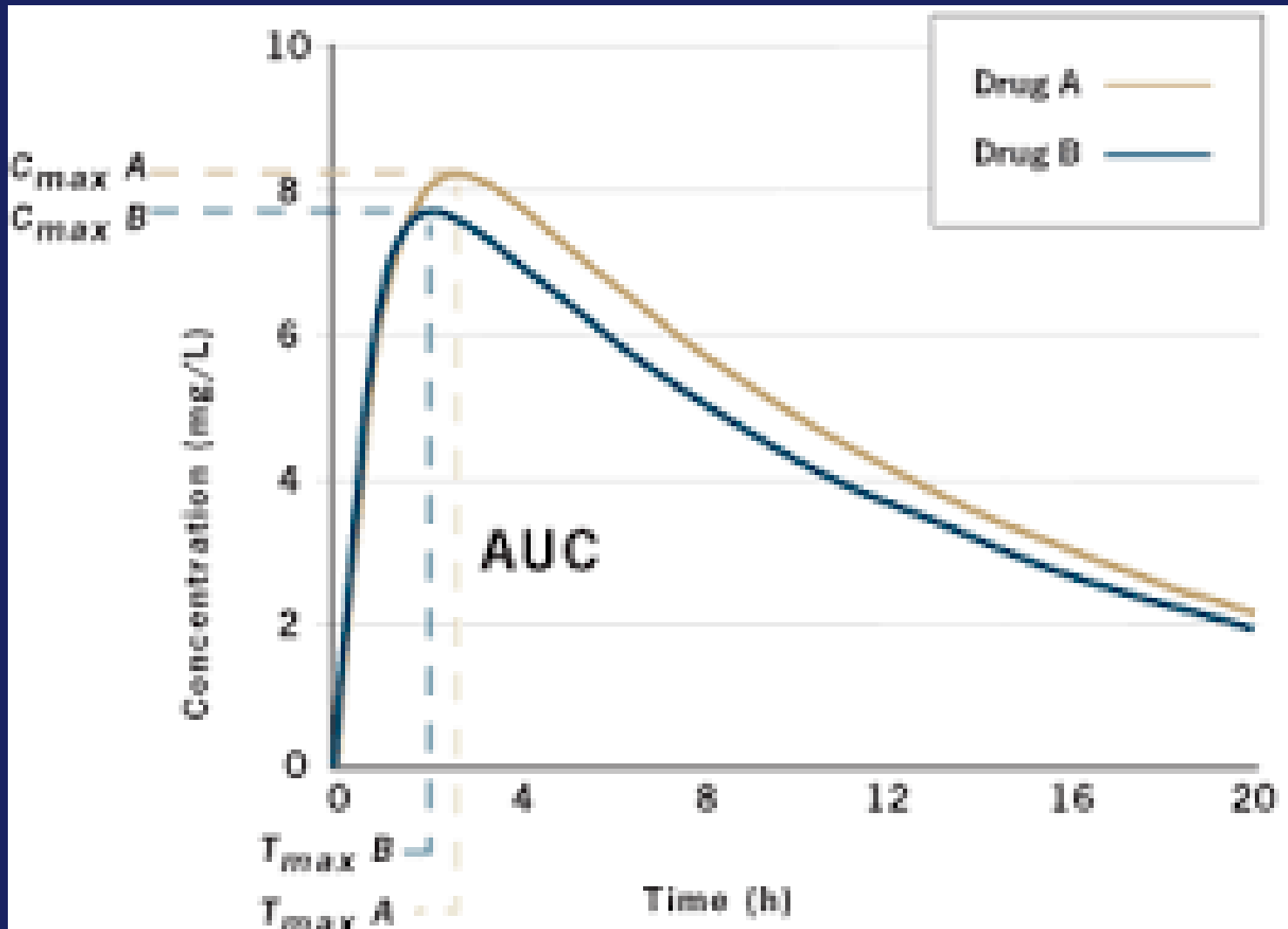
Cost-effectiveness Acceptability Curve



ACEIs & ARBs in Thailand



Do We Need a Clinical Trial for Generic Drugs?



Bioequivalence and Interchangeability of Generic Drugs

www.fda.gov/Drugs/EmergencyPreparedness/BioterrorismandDrugPreparedness/ucm134444.htm — Bioterrorism and Drug Preparedness > FDA Ensures Equivalence of Generic Drugs Reader

U.S. Department of Health & Human Services

a A A



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Anthrax

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Chemical Agents

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Vaccine Information

Pediatric Counter-Terrorism Measures

Resources for You

- **Educational Resources: Generic Drugs**

FDA Ensures Equivalence of Generic Drugs

FDA Consumer article, August 2002

Drug products sold in the United States are approved by the FDA whether they are brand name or generic. "Most people believe that if something costs more, it has to be better quality. In the case of generic drugs, this is not true," says Gary Buehler, Director of FDA's Office of Generic Drugs. "The standards for quality are the same for brand name and generic products."

Despite the strict standards imposed by the FDA for approval of generic drugs, and their enforcement of these standards, a number of misconceptions about generic drugs persist (See "Myths and Facts about Generics" to the right).

New drugs, like other new products, are developed under patent protection. The patent protects the investment in the drug's development by giving the company the sole right to sell the drug while the patent is in effect. When patents or other periods of exclusivity on brand-name drugs are near expiration, manufacturers can apply to the FDA to sell generic versions.

"Much of FDA's review of generic drugs and brand name drugs is the same," Buehler explains (See "Same FDA Requirements for Brand-Name and Generic Drugs" below). There are eight major parts to the FDA's review of a firm's application to sell a generic drug:

- There must be an FDA-approved brand-name drug that is the reference for the proposed generic. The generic must have the same active ingredient or ingredients and the same labeled strength as this reference product. It must have the same dosage form-tablets, patches and liquids are examples of dosage forms. It must be administered the same way, for example, swallowed as a pill or given as an injection.
- The manufacturer must show the generic drug is "bioequivalent" to the brand-name drug (See "What Is Bioequivalence?" below).
- The generic drug's labeling must be essentially the same as that of the approved drug.
- The firm must fully document the generic drug's chemistry, manufacturing steps, and quality control measures. Each step of the process must be detailed for FDA review.
- The firm must assure the FDA that the raw materials and the finished product meet USP specifications, if these have been set. The USP, or U.S. Pharmacopoeia, is the non-profit, scientific body chartered by Congress to set standards for drug purity in this country.
- The firm must show that its generic drug maintains stability as labeled before it can be sold. Once on the market, the firm must continue to monitor the drug's stability. The firm must show that the container and its closure system won't interact with the drug. Firms making sterile drugs must submit sterility assurance data showing microbiologic integrity of these products.
- The firm must provide a full description of the facilities it uses to manufacture, process, test, package, label and control the drug. It must certify that it complies with federal regulations about current good manufacturing practices and undergo FDA inspection of the manufacturing facility to assure compliance.
- Before FDA approves a generic drug, it usually conducts an inspection at the proposed manufacturing site to make sure the firm is capable of meeting its application commitments and to ensure the firm can manufacture the product consistently.

"Generic competition helps keep the cost of drugs down," Buehler says. "It also encourages the research based drug companies to keep finding newer and better

When Generic Substitution May Not be Appropriate

- Drugs on the market before 1938
- Drugs with a narrow therapeutic index (**anticonvulsants, anticoagulants**)
- Some antihypertensive agents (**reserpine**)
- Some oral antiasthmatic agents (**theophylline, aminophylline**)
- Corticosteroid creams, lotions and ointments
- Corticosteroid tablets (**dexamethasone**)
- Hormones (**esterified estrogen, medroxyprogesterone**)
- Antipsychotic drugs (**chlorpromazine**)
- Colchicine



Thank You