

Improving Anaphylaxis Outcomes: Approaches for Enhancing Access to Epinephrine

December 16, 2025 | 9:00 am – 4:30 pm ET



Welcome and Overview

Valerie J. Parker, Duke-Margolis Institute for Health Policy

Statement of Independence

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This event is supported by the Food and Drug Administration (FDA) of the U.S. Department of Health and Human Services (HHS) as part of a financial assistance award U01FD008451 totaling \$1,399,999 with 100 percent funded by FDA/HHS. The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by FDA/HHS, or the U.S. Government.

Logistics

Questions

- All attendees are encouraged to submit questions via Slido.

Zoom Issues?

- Please type your issue in the Q&A or email us at margolisevents@duke.edu.

Meeting Materials

- All meeting materials will be available on the Duke-Margolis website.



Join at
slido.com
#Epi



Event Agenda

9:00 am Welcome and Overview

9:10 am FDA Opening Remarks

9:20 am Session 1: Allergic Diseases, Anaphylaxis, and Treatment of Anaphylaxis in the Community Setting

10:30 am Break

10:45 am Session 2: Regulatory Pathways for Epinephrine Products, Including Considerations for Prescription and Nonprescription Development

11:50 am Lunch Break

Event Agenda

- 1:05 pm** Public Comment Session
- 2:05 pm** Session 3: Current Accessibility to Epinephrine for Treating Anaphylaxis
- 3:05 pm** Break
- 3:20 pm** Session 4: Opportunities to Enhance Access to and Use of Epinephrine
- 4:30 pm** Closing Remarks and Adjournment

FDA Opening Remarks

Mary Thanh Hai, U.S. Food and Drug Administration

Session 1: Allergic Diseases, Anaphylaxis, and Treatment of Anaphylaxis in the Community Setting

Moderator: Paul Greenberger, Northwestern University

Food Allergy Diagnosis & Management

Hugh A Sampson, MD

Kurt Hirschhorn Professor of Pediatrics
Jaffe Food Allergy Institute
Icahn School of Medicine at Mount Sinai

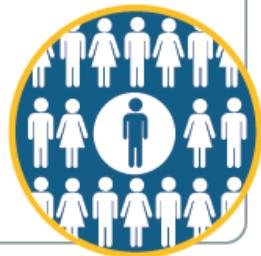
Duke Margolis Institute for Health Policy – December 16, 2025



Icahn School
of Medicine at
Mount
Sinai

Severe or Life-threatening Allergies

1 in 20
AMERICANS
have experienced anaphylaxis
(a severe allergic reaction)



51%
ADULTS
with food allergies have had a severe reaction



42%
CHILDREN
with food allergies have had a severe reaction



25%
of severe allergic reactions in school occur without a prior diagnosis



\$1.2
BILLION
annual direct medical costs



225
DEATHS
per year from anaphylaxis in the U.S.



58.8%
of all **ANAPHYLAXIS**
deaths are due to drug allergies



72
DEATHS
per year from insect venom allergy



- Estimated that ~30 million Americans have **food allergies**
 - ~10% of adults
 - ~6% of children
- Estimated that ~2 million Americans have **bee sting allergies**
 - 0.5 – 3% of adults
 - 0.15 – 0.8% of children
- Estimated ~1 – 6% of Americans have **latex allergy**
- Estimated that ~33 million Americans have a **drug allergy**
 - 10% of the population

Adapted from –
AllergyAsthmaNetwork.org
April 2025

Objectives

- **Understand how allergist diagnose food allergies & other preventable allergies leading to anaphylaxis**
- **Understand how allergists manage food allergies & other preventable allergies leading to anaphylaxis**

Spectrum of Possible Food Allergic Reactions

- 10 m/o vomits repetitively 2 hrs. after ingesting rice cereal
- 43 y/o gets bloating & diarrhea after eating pizza & ice cream
- 12 y/o develops anaphylaxis after ingesting a “trail bar”
- 4 family members develop pruritus, facial erythema & vomiting after eating tuna at a local restaurant
- 3 y/o with atopic dermatitis has eczematous flare after eating eggs
- 24 y/o seen in ER after steak “gets stuck going down”
- 32 y/o hunter develops anaphylaxis 4 hrs. after eating steak

Getting to the Right Diagnosis & Treatment

Requires –

- Careful history
- Choosing & interpreting the right tests
- Educating patient & caregivers about allergen avoidance & recognition of anaphylaxis
- Educating patients & caregivers about the use of rescue medications, e.g. epinephrine
- Discuss potential therapies, e.g. omalizumab & immunotherapy

Step 1: Careful History

History is key:

- **Timing** (minutes to a few hours)
- **Symptoms** (skin, gut, respiratory, cardiovascular)
- **Quantity & preparation of food** (e.g. raw vs. cooked vs. baked)
- **Reproducibility** (previously or subsequently tolerated?)
- **Treatment** (resolution/outcome)
- **Co-factors** (exercise, fever, alcohol, medications [e.g. NSAIDs])

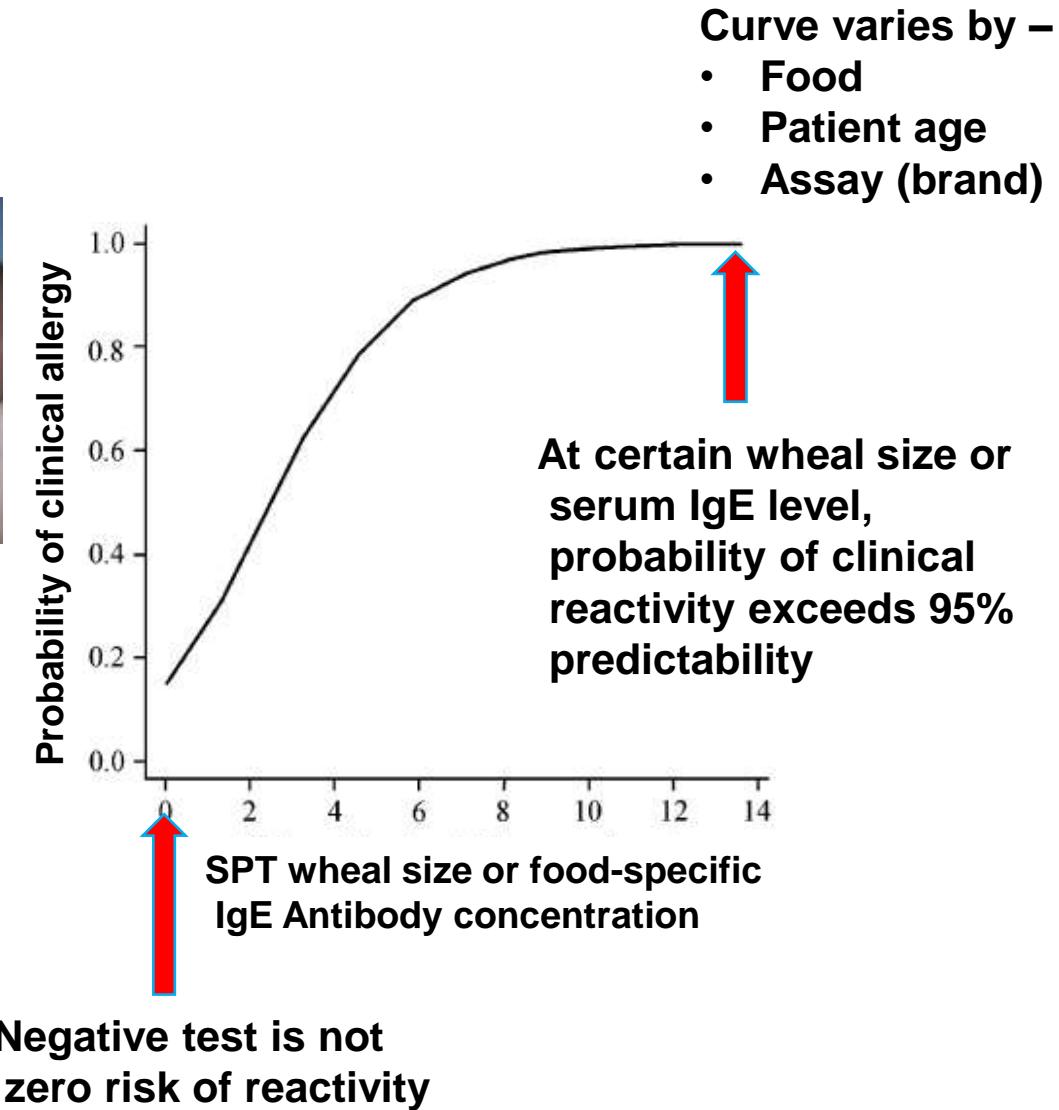
History informs testing – provides “pre-test probability”

Diagnostic testing serves to support/refute diagnosis of suspected allergy based on history

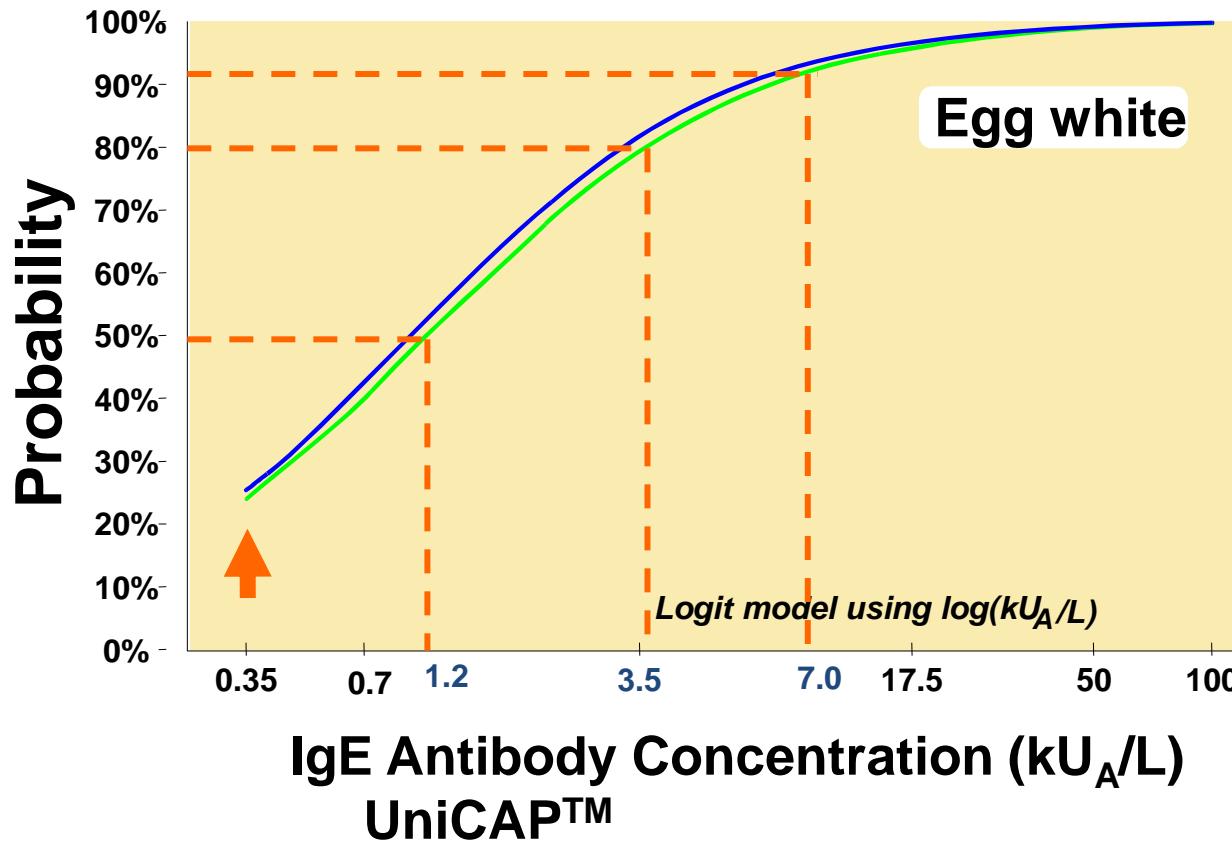
Step 2: Food Allergy Testing

Skin prick testing & food-specific IgE testing

- Avoid panel testing (poor positive predictive value → overdiagnosis, unnecessary avoidance)
- Sensitization (+ test) alone is not diagnostic without convincing history of clinical reaction
- Larger wheals on SPT, higher values of food-specific IgE correlate with higher likelihood of reactivity (not severity of reaction)
- Negative results → allergy unlikely



Step 3: Predictive Value of Food-specific IgE



Allergen	Decision Pt (kU _A /L)
Egg	7
(< 2 yrs of age)+	2
Milk	15
(< 1yr of age)++	5
Peanut	14
(< 3yrs of age)	5
Soy	30
Wheat	26
Tree nuts+++	15

Quantity of food-specific IgE correlates with probability of allergic reactivity

- does not correlate with severity of reaction or sensitivity, i.e. eliciting dose

- + Boyano MT, et al. *Clin Exp Allergy* 2001; 31:1464-9.
- ++ Garcia-Ara C, et al. *JACI* 2001; 107:185-90.
- +++ Clark AT, Ewan P. *Clin Exp Allergy* 2003; 33:1041-45. Maloney J et al. *JACI* 2008; 122:145-5.

Step 4: Oral Food Challenge [OFC]

- **OFC – double-blind or open**
- **Age-appropriate serving size** divided in 4 – 5 increasing doses spaced 15 – 30 mins apart
- **When to stop the OFC**
 - **Objective signs** of allergic reaction (see table)
 - **Subjective signs** only - use clinical judgement
 - Consider risk/benefit of continuing vs. stopping
 - Persistent symptoms or those associated with change in behavior in a child may be more indicative of reaction
 - May extend observation period before next dose if concern that a reaction may be evolving

Stopping Criteria *E15

The OFC should be stopped if any **1** of the following symptoms is present during the OFC:

Skin

- ≥ 3 urticarial lesions
- Angioedema
- Confluent erythematous, pruritic rash

Respiratory

- Wheezing
- Repetitive cough
- Difficulty breathing/increased work of breathing
- Stridor
- Dysphonia
- Aphony

Gastrointestinal

- Vomiting alone not associated with gag reflex
- Severe abdominal pain (such as abnormal stillness, inconsolable crying, or drawing legs up to abdomen) that persists for ≥ 3 min

Cardiovascular

- Hypotension for age not associated with vasovagal episode

If 2 or more of the following are present, the OFC should be stopped:

Skin

- Persistent scratching for ≥ 3 min

Respiratory

- Persistent rubbing of the nose or eyes for ≥ 3 min
- Persistent rhinorrhea for ≥ 3 min

Gastrointestinal

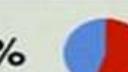
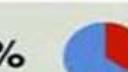
- Diarrhea

Step 5: Following-up Diagnosis

- Educate patient/caregivers about allergen avoidance
- Educate patient/caregivers to recognize symptoms of pending anaphylaxis
- Provide and review a comprehensive emergency treatment plan and use of an epinephrine delivery device
- In infants with milk or egg allergy, consider a baked milk/egg OFC
- In infants diagnosed with a food allergy at < 3 yrs of age, discuss initiating immunotherapy [currently peanut-OIT; EPIT & SLIT in clinical trials]
- In older children, adolescents & adults, especially with multiple food allergies, discuss initiating omalizumab [Xolair®] therapy
- Greater than 25 novel therapeutic approaches in development for treating food allergies

Step 5: Education regarding Food Allergen Cross-reactivity

- Cross-reactivity within food groups
- Cross-reactivity with pollens

If Allergic to:	Risk of Reaction to at Least One:	Risk:
A legume* peanut	Other legumes peas, lentils, beans	5% 
A tree nut walnut	Other tree nuts cashew, brazil, hazelnut	37% 
A fish* salmon	Other fish swordfish, sole	50% 
A shellfish shrimp	Other shellfish crab, lobster	75% 
A grain* wheat	Other grains barley, rye	20% 
Cow's milk* 	Beef hamburger	10% 
Cow's milk* 	Goat's milk goat	92% 
Cow's milk* 	Mare's milk horse	4% 
Pollen birch, ragweed	Fruits/vegetables apple, peach, honeydew	55% 
Peach* 	Other Rosaceae plum, pear, apple, cherry	55% 
Melon* cantaloupe	Other fruits watermelon, banana, avocado	92% 
Latex* latex glove	Fruits kiwi, banana, avocado	35% 
Fruits kiwi, banana, avocado	Latex latex glove	11% 



Epinephrine should be provided to patients at risk for anaphylaxis



	Recommendation	Strength of Recommendation	Certainty of Evidence
CBS 23	<p>We recommend clinicians routinely <u>prescribe epinephrine to patients at higher risk of anaphylaxis.</u></p>		Very low (there are no validated risk-stratification algorithms)
	<p>When deciding whether to prescribe epinephrine to lower-risk patients, we suggest that clinicians engage in a shared-decision making process that considers the patients' risk factors, values, and preferences.</p>	Conditional	

When to Prescribe Epinephrine

	Lower likelihood	Higher likelihood of anaphylaxis
IgE-mediated food allergy		<ul style="list-style-type: none">• Hx of prior systemic allergic reaction following exposure
Pollen food allergy syndrome	<ul style="list-style-type: none">• No hx of anaphylaxis to causative food	<ul style="list-style-type: none">• Hx of anaphylaxis to causative food
Venom or insect bite/sting allergy	<ul style="list-style-type: none">• Hx of only large local or cutaneous systemic reaction(s)• Hx of anaphylaxis, but on maintenance VIT or discontinued VIT after more than 5 years of tx with no high-risk factors	<ul style="list-style-type: none">• Hx of anaphylaxis, not treated with a complete course of venom immunotherapy (VIT)• Current VIT, with hx of prior systemic reaction(s) to VIT• Honeybee allergy• Elevated basal tryptase level• Frequent exposure
Latex allergy	<ul style="list-style-type: none">• Low likelihood of exposure	<ul style="list-style-type: none">• Occupational exposure
Drug allergy	<ul style="list-style-type: none">• Low likelihood of exposure	<ul style="list-style-type: none">• Occupational exposure
Exercise-induced anaphylaxis		<ul style="list-style-type: none">• All cases
Physical urticarias		<ul style="list-style-type: none">• Cold induced
Aeroallergen immunotherapy	<ul style="list-style-type: none">• No hx of prior systemic reaction(s) to AIT and no relevant comorbidities (e.g., asthma)	<ul style="list-style-type: none">• Hx of prior systemic reaction(s) to AIT and/or relevant comorbidities (e.g., asthma)

Summary

- A detailed clinical history is critical for informing the diagnostic work-up and for arriving at the correct diagnosis
- Evaluation of skin tests & serum IgE laboratory tests alone are **NOT** sufficient to diagnose food allergy
- While the oral food challenge remains the “gold standard” for diagnosing food allergy, the majority cases can be diagnosed with a thorough medical history & appropriate lab studies
- Once the diagnosis is established, patients must be educated on allergen avoidance, recognition & management of anaphylaxis, and informed about potential treatments available

Thank you

Anaphylaxis

Julie Wang, MD
Professor of Pediatrics
Division of Allergy & Immunology
December 16, 2025



Icahn School
of Medicine at
Mount
Sinai

Objectives

1. Define anaphylaxis
2. Review signs and symptoms of anaphylaxis
3. Discuss management of anaphylaxis with self-administration of epinephrine



Recognizing anaphylaxis

Anaphylaxis definition, overview, and clinical support tool: 2024 consensus report—a GA²LEN project

Timothy E. Dribin, MD, Antonella Muraro, MD, PhD, Carlos A. Camargo Jr, MD, DrPH, Paul J. Turner, FRCPCH, PhD, Julie Wang, MD, Graham Roberts, DM, et al

J Allergy Clin Immunol
August 2025



Anaphylaxis definition, overview, and clinical support tool: 2024 consensus report

Study Summary

- A 46-member expert panel developed a consensus anaphylaxis definition, overview, and clinical support tool based on feedback from medical and patient advocacy organizations.
- The outputs are designed to be generalizable to different medical fields and to help standardize research outcomes.

Consensus anaphylaxis definition



Expert
Agreement

Anaphylaxis is a serious allergic (hypersensitivity) reaction that can progress rapidly and may cause death.

It may involve the skin/mucosa (includes lip/tongue), respiratory (lungs, breathing), cardiovascular (heart, blood pressure), and/or gastrointestinal (stomach/gut) systems. Life-threatening anaphylaxis is characterized by respiratory and/or cardiovascular involvement and may occur without skin/mucosa involvement.

Consensus anaphylaxis overview



Expert
Agreement

The overview conveys important anaphylaxis information, including anaphylaxis presentations, distinct infant findings, common allergens, courses, outcomes, pathogenesis, diagnosis, and management.

Anaphylaxis Clinical Support Tool

For Healthcare Professionals

Anaphylaxis is likely when any one of the following three criteria are fulfilled

1 No Known[†] Allergen Exposure

Sudden onset of an illness (minutes to several hours) with Skin / Mucosal involvement AND either:

- Respiratory involvement
- Cardiovascular involvement

2 Likely or Known[†] Allergen Exposure

Sudden onset of two or more of the following:

- Skin / Mucosal involvement
- Respiratory involvement
- Cardiovascular involvement
- Severe Gastrointestinal involvement [‡]

3 Known[†] Allergen Exposure

Sudden onset of either:

- Respiratory involvement after exposure to a non-inhaled allergen
- Cardiovascular involvement

! Intramuscular Epinephrine / Adrenaline*

- Should be given immediately for suspected anaphylaxis
- Can be given for patients that do not yet fulfill the criteria, based on clinical judgement

Administer in the middle third of the anterolateral thigh; repeat every 5–15 minutes if the patient does not respond

Manual

- 0.01 mg/kg = 0.01 mL/kg of 1 mg/mL (1:1000) solution
- Max single dose 0.5 mg

Auto-injectors

- < 15 kg: 0.1 mg or 0.15 mg
- 15 to < 25 kg: 0.15 mg
- ≥ 25 kg: 0.3 mg (≥ 50 kg: 0.3 mg or 0.5 mg)

Anaphylaxis Organ Systems[§]

Respiratory
wheezing, increased work of breathing[¶],
hypoxemia, cough, dyspnea,
Laryngeal: stridor, voice change
Infants may also have a hoarse cry

Skin
urticaria, flushing, erythema, facial swelling
Infants may also have mottling

Mucosal
lip, tongue, or oropharyngeal swelling,
severe throat tightness, difficulty swallowing
Infants may also have repetitive lip licking

Cardiovascular
hypotension, syncope, dizziness,
bradycardia, tachycardia, change in mental status
Infants may also have persistent unexplained tachycardia

Gastrointestinal
severe crampy abdominal pain,
repetitive vomiting, diarrhea

Clinical support tool

Expert
Agreement



New clinical criteria to help determine the likelihood that patients are having anaphylaxis.

Intramuscular epinephrine / adrenaline indications and dosing.

Common findings from the anaphylaxis organ systems.



TABLE E2. Expert panel characteristics

Characteristic	No. (%)
Medical specialty*	
Allergy/immunology	40 (87.0)
Anesthesia	2 (4.3)
Emergency medicine	5 (10.9)
Epidemiology, public health	1 (2.2)
Intensive care	2 (4.3)
Primary care	1 (2.2)
Pulmonary	1 (2.2)
Patient population	
Pediatric	27 (58.7)
Adult	4 (8.7)
Pediatric and adult	15 (32.6)
Country of practice/work	
Argentina	1 (2.2)
Australia	3 (6.5)
Canada	2 (4.3)
China	1 (2.2)
Denmark	2 (4.3)
France	3 (6.5)
Germany	3 (6.5)
Italy	3 (6.5)
Japan	2 (4.3)
The Netherlands	1 (2.2)
Spain	4 (8.7)
Sweden	1 (2.2)
United Kingdom	5 (10.9)
United States	15 (32.6)

*Experts may be trained in more than one specialty.

Box 3. Organizations that endorsed study outputs

Medical

- American Academy of Allergy, Asthma & Immunology (AAAAI)
- American Academy of Pediatrics (AAP)
- American Association of Nurse Anesthesiology (AANA)
- American Association of Nurse Practitioners (AANP)
- American College of Asthma, Allergy & Immunology (ACAAI)
- Asia Pacific Association for Adult Allergy and Clinical Immunology (APAACI)
- Asia Pacific Academy of Pediatric Allergy, Respirology and Immunology (APAPARI)
- Australasian Society for Allergy and Clinical Immunology (ASCIA)
- British Society for Allergy & Clinical Immunology (BSACI)
- Canadian Society for Allergy and Clinical Immunology (CSACI)
- Chinese Society of Allergy
- Emergency Nurses Association (ENA)
- European Society for Emergency Medicine (EuSEM)
- European Society of Anaesthesiology and Intensive Care (ESAIC)
- German Society for Allergology and Clinical Immunology (DGAKI)
- Deutsche Gesellschaft für Allergologie und klinische Immunologie
- National Association of Emergency Medical Technicians (NAEMT)
- National Association of EMS Physicians (NAEMSP)
- National Association of State EMS Officials (NASEMSO)
- Polish Society of Allergology
- Society of Critical Care Medicine (SCCM)
- Society of Emergency Medicine PAs

Anaphylaxis Definition

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It may involve the skin/mucosa (includes lip/tongue), respiratory (lungs, breathing), cardiovascular (heart, blood pressure), and/or gastrointestinal (stomach/gut) systems.

Life-threatening anaphylaxis is characterized by respiratory and/or cardiovascular involvement and may occur without skin/mucosa involvement.

Anaphylaxis Clinical Support Tool

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- **Respiratory** involvement
- **Cardiovascular** involvement

2 Likely or Known[†] Allergen Exposure

Sudden onset of **two** or more of the following:

- **Skin / Mucosal** involvement
- **Respiratory** involvement
- **Cardiovascular** involvement
- Severe **Gastrointestinal** involvement [‡]

3 Known[†] Allergen Exposure

Sudden onset of **either**:

- **Respiratory** involvement after exposure to a non-inhaled allergen
- **Cardiovascular** involvement

Anaphylaxis Organ Systems[§]



Skin

urticaria, flushing, erythema, facial swelling
Infants may also have mottling



Mucosal

lip, tongue, or oropharyngeal swelling,
severe throat tightness, difficulty swallowing
Infants may also have repetitive lip licking



Respiratory

wheezing, increased work of breathing[¶],
hypoxemia, cough, dyspnea
Laryngeal: stridor, voice change
Infants may also have a hoarse cry



Cardiovascular

hypotension, syncope, dizziness,
unexplained change in mental status
**Infants may also have persistent
unexplained tachycardia**



Gastrointestinal

severe crampy abdominal pain,
repetitive vomiting, diarrhea

Epinephrine for anaphylaxis



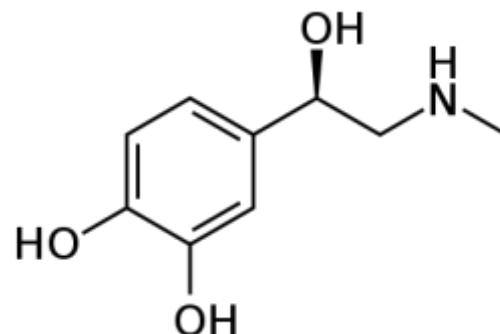
Practice Parameters

Anaphylaxis: A 2023 practice parameter update

David B.K. Golden, MDCM*; Julie Wang, MD[†]; Susan Waserman, MD[‡]; Cem Akin, MD[§];
Ronna L. Campbell, MD, PhD^{||}; Anne K. Ellis, MD, MSc[¶]; Matthew Greenhawt, MD, MBA, MSc[#];
David M. Lang, MD^{**}; Dennis K. Ledford, MD^{††,††}; Jay Lieberman, MD^{§§};
John Oppenheimer, MD^{|||}; Marcus S. Shaker, MD, MSc^{¶¶,¶¶}; Dana V. Wallace, MD^{***};
Elissa M. Abrams, MD, MPH^{†††}; Jonathan A. Bernstein, MD^{†††,§§§}; Derek K. Chu, MD, PhD^{||||};
Caroline C. Horner, MD, MScI^{¶¶¶}; Matthew A. Rank, MD^{###}; David R. Stukus, MD^{****};

Ann Allergy Asthma Immunol 132 (2024) 124–176

Epinephrine is first line treatment for anaphylaxis



Mechanism of action

Alpha-adrenergic stimulation:

- increased vascular smooth muscle contraction (vasoconstriction)
- pupillary dilator muscle contraction (mydriasis)
- intestinal sphincter muscle contraction
- decreased edema

Beta-adrenergic stimulation:

Beta-1 receptors

- increased heart rate
- increased myocardial contractility
- renin release

Beta-2 receptors

- bronchodilation
- dose-dependent inhibition of mast cell degranulation
- vasodilation
- tocolysis
- increased aqueous humor production

Early use of epinephrine during severe allergic reactions can improve outcomes

Decreased risk of:

- ✓ Needing additional doses of epinephrine
- ✓ Biphasic anaphylaxis
- ✓ Hospitalization
- ✓ Fatality



	Recommendation	Strength of Recommendation	Certainty of Evidence
CBS 27	<p><u>Serious adverse reactions to intramuscular epinephrine are very rare</u> and should not pose a barrier to the prescription or early administration of epi when indicated.</p>	Strong	Low
CBS 6	<p>We suggest that meeting diagnostic criteria for anaphylaxis is <u>not required</u> prior to the use of epinephrine.</p>	Conditional	Low

Antihistamines and steroids should not be used in place of epinephrine for anaphylaxis

2015 Anaphylaxis Practice Parameter

- Antihistamines are considered **2nd line**
- Corticosteroids have **no role** in the acute management of anaphylaxis

2020 Anaphylaxis Practice Parameter

- Suggest **against** administering antihistamines and corticosteroids as interventions to prevent biphasic anaphylaxis



Preparing patients and families to manage anaphylaxis



This Clinical Report was reaffirmed September 12, 2023.

Guidance on Completing a Written Allergy and Anaphylaxis Emergency Plan

Julie Wang, MD, FAAP,^a Scott H. Sicherer, MD, FAAP,^{a,b} SECTION ON ALLERGY AND IMMUNOLOGY

Allergy and Anaphylaxis Emergency Plan

Child's name: _____ Date of plan: _____		American Academy of Pediatrics DEDICATED TO THE HEALTH OF ALL CHILDREN™											
Date of birth: _____	Age _____ Weight: _____ kg												
Child has allergy to: _____		Attach child's photo											
<p>IMPORTANT REMINDER Anaphylaxis is a potentially life-threatening, severe allergic reaction. If in doubt, give epinephrine.</p> <table border="1"> <tr> <td>For Severe Allergy and Anaphylaxis What to look for</td> <td>Give epinephrine! What to do</td> </tr> <tr> <td> <p>If child has ANY of these severe symptoms after eating the food or having a sting, give epinephrine.</p> <ul style="list-style-type: none"> Shortness of breath, wheezing, or coughing Skin color is pale or has a bluish color Weak pulse Fainting or dizziness Tight or hoarse throat Trouble breathing or swallowing Swelling of lips or tongue that bother breathing Vomiting or diarrhea (if severe or combined with other symptoms) Many hives or redness over body Feeling of "doom," confusion, altered consciousness, or agitation <p>□ SPECIAL SITUATION: If this box is checked, child has an extremely severe allergy to an insect sting or the following foods: _____ Even if child has MILD symptoms after a sting or eating these foods, give epinephrine.</p> </td> <td> <ol style="list-style-type: none"> Give epinephrine right away! Note time when epinephrine was given. Call 911. <ul style="list-style-type: none"> Ask for ambulance with epinephrine. Tell rescue squad when epinephrine was given. Stay with child and: <ul style="list-style-type: none"> Call parents and child's doctor. Give a second dose of epinephrine, if symptoms get worse, continue, or do not get better in 5 minutes. Keep child lying on back. If the child vomits or has trouble breathing, keep child lying on his or her side. Give other medicine, if prescribed. Do not use other medicine in place of epinephrine. <ul style="list-style-type: none"> Antihistamine Inhaler/bronchodilator </td> </tr> <tr> <td>For Mild Allergic Reaction What to look for</td> <td>Monitor child What to do</td> </tr> <tr> <td> <p>If child has had any mild symptoms, monitor child. Symptoms may include:</p> <ul style="list-style-type: none"> Itchy nose, sneezing, itchy mouth A few hives Mild stomach nausea or discomfort </td> <td> <p>Stay with child and:</p> <ul style="list-style-type: none"> Watch child closely. Give antihistamine (if prescribed). Call parents and child's doctor. If more than 1 symptom or symptoms of severe allergy/anaphylaxis develop, use epinephrine. (See "For Severe Allergy and Anaphylaxis.") </td> </tr> <tr> <td colspan="2"> <p>Medicines/Doses Epinephrine (first type): _____ intramuscular: <input type="checkbox"/> 0.10 mg (7.5 kg to less than 13 kg) <input type="checkbox"/> 0.15 mg (13 kg to less than 25 kg) <input type="checkbox"/> 0.30 mg (25 kg or more)</p> <p>Intranasal: <input type="checkbox"/> 1 mg (4 years or older and 15 kg to less than 30 kg) <input type="checkbox"/> 2 mg (30 kg or more)</p> <p>(*Use 0.15 mg, if 0.10 mg is not available)</p> <p>**If more than one epinephrine is selected, then either one can be used</p> </td> <td> <p>Parent/Guardian Authorization Signature _____ Date _____</p> <p>Physician/HCP Authorization Signature _____ Date _____</p> <p>© 2017 American Academy of Pediatrics. Updated 04/2025. All rights reserved. Your child's doctor will tell you to do what's best for your child. This information should not take the place of talking with your child's doctor. Page 1 of 2.</p> </td> </tr> </table>			For Severe Allergy and Anaphylaxis What to look for	Give epinephrine! What to do	<p>If child has ANY of these severe symptoms after eating the food or having a sting, give epinephrine.</p> <ul style="list-style-type: none"> Shortness of breath, wheezing, or coughing Skin color is pale or has a bluish color Weak pulse Fainting or dizziness Tight or hoarse throat Trouble breathing or swallowing Swelling of lips or tongue that bother breathing Vomiting or diarrhea (if severe or combined with other symptoms) Many hives or redness over body Feeling of "doom," confusion, altered consciousness, or agitation <p>□ SPECIAL SITUATION: If this box is checked, child has an extremely severe allergy to an insect sting or the following foods: _____ Even if child has MILD symptoms after a sting or eating these foods, give epinephrine.</p>	<ol style="list-style-type: none"> Give epinephrine right away! Note time when epinephrine was given. Call 911. <ul style="list-style-type: none"> Ask for ambulance with epinephrine. Tell rescue squad when epinephrine was given. Stay with child and: <ul style="list-style-type: none"> Call parents and child's doctor. Give a second dose of epinephrine, if symptoms get worse, continue, or do not get better in 5 minutes. Keep child lying on back. If the child vomits or has trouble breathing, keep child lying on his or her side. Give other medicine, if prescribed. Do not use other medicine in place of epinephrine. <ul style="list-style-type: none"> Antihistamine Inhaler/bronchodilator 	For Mild Allergic Reaction What to look for	Monitor child What to do	<p>If child has had any mild symptoms, monitor child. Symptoms may include:</p> <ul style="list-style-type: none"> Itchy nose, sneezing, itchy mouth A few hives Mild stomach nausea or discomfort 	<p>Stay with child and:</p> <ul style="list-style-type: none"> Watch child closely. Give antihistamine (if prescribed). Call parents and child's doctor. If more than 1 symptom or symptoms of severe allergy/anaphylaxis develop, use epinephrine. (See "For Severe Allergy and Anaphylaxis.") 	<p>Medicines/Doses Epinephrine (first type): _____ intramuscular: <input type="checkbox"/> 0.10 mg (7.5 kg to less than 13 kg) <input type="checkbox"/> 0.15 mg (13 kg to less than 25 kg) <input type="checkbox"/> 0.30 mg (25 kg or more)</p> <p>Intranasal: <input type="checkbox"/> 1 mg (4 years or older and 15 kg to less than 30 kg) <input type="checkbox"/> 2 mg (30 kg or more)</p> <p>(*Use 0.15 mg, if 0.10 mg is not available)</p> <p>**If more than one epinephrine is selected, then either one can be used</p>		<p>Parent/Guardian Authorization Signature _____ Date _____</p> <p>Physician/HCP Authorization Signature _____ Date _____</p> <p>© 2017 American Academy of Pediatrics. Updated 04/2025. All rights reserved. Your child's doctor will tell you to do what's best for your child. This information should not take the place of talking with your child's doctor. Page 1 of 2.</p>
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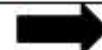
Allergy and Anaphylaxis Emergency Plan

Child's name: _____ Date of plan: _____		American Academy of Pediatrics DEDICATED TO THE HEALTH OF ALL CHILDREN™
Additional instructions:		
<p>Contacts</p> <p>Call 911 / Rescue squad: _____</p> <p>Doctor: _____ Phone: _____</p> <p>Parent/Guardian: _____ Phone: _____</p> <p>Parent/Guardian: _____ Phone: _____</p> <p>Other Emergency Contacts</p> <p>Name/Relationship: _____ Phone: _____</p> <p>Name/Relationship: _____ Phone: _____</p>		

English – aap.org/aaep
Spanish – aap.org/aaep.spanish

**IMPORTANT REMINDER****Anaphylaxis is a potentially life-threatening, severe allergic reaction. If in doubt, give epinephrine.****Give epinephrine!****What to do**

1. Give epinephrine right away! Note time when epinephrine was given.
2. Call 911.
 - Ask for ambulance with epinephrine.
 - Tell rescue squad when epinephrine was given.
3. Stay with child and:
 - Call parents and child's doctor.
 - Give a second dose of epinephrine, if symptoms get worse, continue, or do not get better in 5 minutes.
 - Keep child lying on back. If the child vomits or has trouble breathing, keep child lying on his or her side.
4. Give other medicine, if prescribed. Do not use other medicine in place of epinephrine.
 - Antihistamine
 - Inhaler/bronchodilator

For Severe Allergy and Anaphylaxis**What to look for**

If child has ANY of these severe symptoms after eating the food or having a sting, **give epinephrine**.

- Shortness of breath, wheezing, or coughing
- Skin color is pale or has a bluish color
- Weak pulse
- Fainting or dizziness
- Tight or hoarse throat
- Trouble breathing or swallowing
- Swelling of lips or tongue that bother breathing
- Vomiting or diarrhea (if severe or combined with other symptoms)
- Many hives or redness over body
- Feeling of "doom," confusion, altered consciousness, or agitation

SPECIAL SITUATION: If this box is checked, child has an extremely severe allergy to an insect sting or the following food(s): _____ Even if child has MILD symptoms after a sting or eating these foods, **give epinephrine**.

For Mild Allergic Reaction**What to look for**

If child has had any mild symptoms, **monitor child**.

Symptoms may include:

- Itchy nose, sneezing, itchy mouth
- A few hives
- Mild stomach nausea or discomfort

Monitor child**What to do**

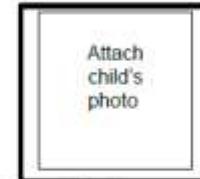
Stay with child and:

- Watch child closely.
- Give antihistamine (if prescribed).
- Call parents and child's doctor.
- If more than 1 symptom or symptoms of severe allergy/anaphylaxis develop, use epinephrine. (See "For Severe Allergy and Anaphylaxis.")

Child's name: _____ Date of plan: _____

Date of birth: ____ / ____ / ____ Age: ____ Weight: ____ kg

Child has allergy to _____

Child has asthma. Yes No (If yes, higher chance severe reaction)Child has had anaphylaxis. Yes NoChild may carry medicine. Yes NoChild may give him/herself medicine. Yes No (If child refuses/is unable to self-treat, an adult must give medicine)

IMPORTANT REMINDER

Anaphylaxis is a potentially life-threatening, severe allergic reaction. If in doubt, give epinephrine.

For Severe Allergy and Anaphylaxis What to look for

If child has ANY of these severe symptoms after eating the food or having a sting, give epinephrine.

- Shortness of breath, wheezing, or coughing
- Skin color is pale or has a bluish color
- Weak pulse
- Fainting or dizziness
- Tight or hoarse throat
- Trouble breathing or swallowing
- Swelling of lips or tongue that bother breathing
- Vomiting or diarrhea (if severe or combined with other symptoms)
- Many hives or redness over body
- Feeling of "doom," confusion, altered consciousness, or agitation

 SPECIAL SITUATION: If this box is checked, child has an extremely severe allergy to an insect sting or the following foods:

Even if child has MILD symptoms after a sting or eating these foods, give epinephrine.

Give epinephrine!
What to do

1. Give epinephrine right away! Note time when epinephrine was given.
2. Call 911.
 - Ask for ambulance with epinephrine.
 - Tell rescue squad when epinephrine was given.
3. Stay with child and:
 - Call parents and child's doctor.
 - Give a second dose of epinephrine, if symptoms get worse, continue, or do not get better in 5 minutes.
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 - Antihistamine
 - Inhaler/bronchodilator

For Mild Allergic Reaction What to look for

If child has had any mild symptoms, monitor child. Symptoms may include:

- Itchy nose, sneezing, itchy mouth
- A few hives
- Mild stomach nausea or discomfort

Monitor child
What to do

Stay with child and:

- Watch child closely.
- Give antihistamine (if prescribed).
- Call parents and child's doctor.
- If more than 1 symptom or symptoms of severe allergy/anaphylaxis develop, use epinephrine. (See "For Severe Allergy and Anaphylaxis.")

Medicines/Doses

Epinephrine (list type): _____

Intramuscular:

0.10 mg (7.5 kg to less than 13 kg)*
 0.15 mg (13 kg to less than 25 kg)
 0.30 mg (25 kg or more)

(*Use 0.15 mg, if 0.10 mg is not available)

Intranasal:

1 mg (4 years or older and 15 kg to less than 30 kg)
 2 mg (30 kg or more)

**If more than one epinephrine is selected, then either one can be used

Antihistamine, by mouth (type and dose): _____

Other (for example, inhaler/bronchodilator if child has asthma): _____

Parent/Guardian Authorization Signature _____ Date _____

Physician/HCP Authorization Signature _____ Date _____

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This information should not take the place of talking with your child's doctor. Page 1 of 2.

Epinephrine is first line treatment for anaphylaxis

Intramuscular: 0.10 mg (7.5 kg to less than 13 kg)*
 0.15 mg (13 kg to less than 25 kg)
 0.30 mg (25 kg or more)

(*Use 0.15 mg, if 0.10 mg is not available)

Intranasal: 1 mg (4 years or older and 15 kg to less than 30 kg)
 2 mg (30 kg or more)

**If more than one epinephrine is selected, then either one can be used

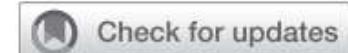


When to call EMS after epinephrine use

When should EMS be activated after epinephrine use?

	Recommendation	Strength of Recommendation	Certainty of Evidence
CBS 26	<p>We suggest that clinicians counsel patients that <u>immediate activation of EMS may not be required if the patient experiences prompt, complete, and durable response to treatment with epinephrine</u>, provided that additional epinephrine and medical care are readily available, if needed.</p>	Conditional	Very low
	<p>We suggest that clinicians counsel patients to always activate EMS following epinephrine use, if anaphylaxis is severe, fails to resolve promptly, fails to resolve completely or nearly completely, or returns or worsens following a first dose of epinephrine.</p>		

Use of multiple epinephrine doses in anaphylaxis: A systematic review and meta-analysis



Nandinee Patel, MD,^a Kok Wee Chong, MD,^b Alexander Y. G. Yip, BSc,^c Despo Ierodiakonou, MD, PhD,^d

Joan Bartra, MD, PhD,^e Robert J. Boyle, MD, PhD,^a and Paul J. Turner, FRCPCH, PhD^a *London, United Kingdom; Singapore; Nicosia, Cyprus; and Barcelona, Spain*

86 studies (36,557 anaphylaxis events) met the inclusion criteria

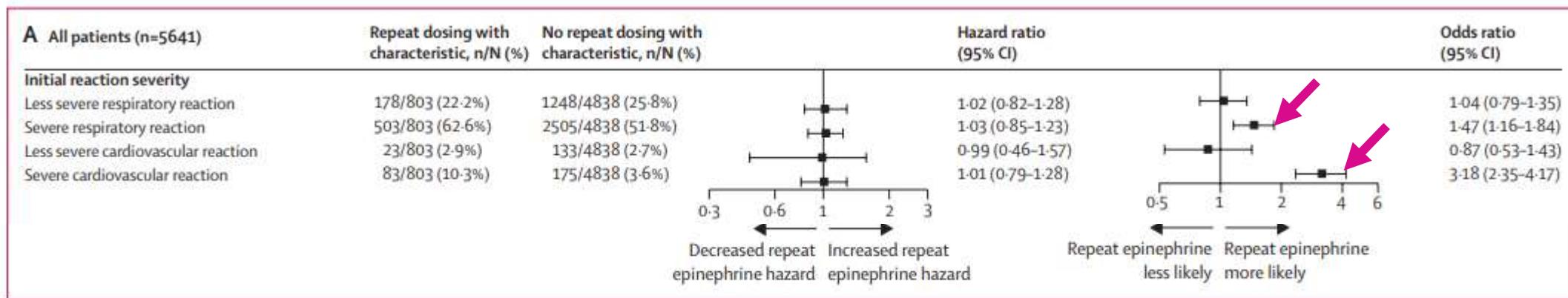
Epinephrine	Anaphylaxis events	
>1 dose	7.7% (95% CI=6.4-9.1)	 >90% treated with 1 dose >97% treated with 2 doses
>2 doses (3 or more)	2.2% (95% CI=1.1-4.1)	

Patients with severe respiratory or cardiovascular symptoms more likely receive repeat epi

- Retrospective cohort study, 2016-2019
- 30 ED in the USA and 1 ED in Canada
- 5641 patients, median age = 7.9 years, 43.9% female

>97% cases treated with 1-2 doses of epinephrine

Figure 3: Predictors of repeat epinephrine



Summary points

- Important to teach recognition of signs/symptoms of anaphylaxis and how/when to use epinephrine
- Provide families with allergy and anaphylaxis emergency plans to guide management of allergic reactions
- Home management of anaphylaxis may be an option and requires shared decision-making



Thank you!



Session 1: Allergic Diseases, Anaphylaxis, and Treatment of Anaphylaxis in the Community Setting

Moderator:

- **Paul Greenberger**, Northwestern University

Panelists:

- **Hugh Sampson**, Icahn School of Medicine at Mount Sinai
- **Hemant Sharma**, Children's National Hospital
- **Brian Vickery**, Emory University
- **Julie Wang**, Icahn School of Medicine at Mount Sinai

Join at
[slido.com](https://slido.com/#Epi)
#Epi



Moderated Discussion and Q&A

Moderator: Paul Greenberger, Northwestern University

Break

Our program will resume at 10:45 am ET

Session 2: Regulatory Pathways for Epinephrine Products, Including Considerations for Prescription and Nonprescription Development

Moderator: Thomas Roades, Duke-Margolis Institute for Health Policy

FDA Regulation of Prescription Epinephrine Products for the Treatment of Anaphylaxis

Miya Paterniti, MD
Clinical Team Leader

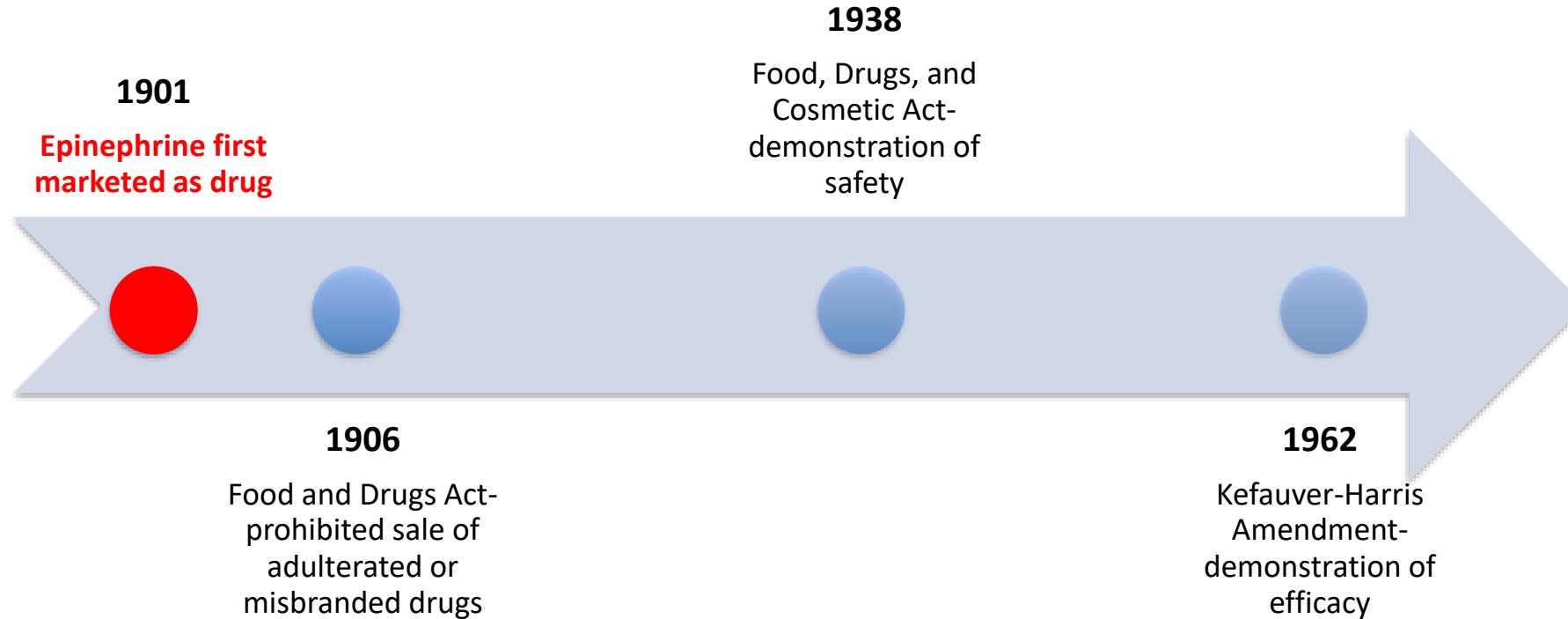
Division of Pulmonology, Allergy, and Critical Care
Office of Immunology and Inflammation
Office of New Drugs
Center for Drug Evaluation and Research
U.S. Food and Drug Administration

Overview



- History of epinephrine
- Approval of epinephrine autoinjectors
- Labeled risks of epinephrine
- Human factors considerations
- Chemistry, manufacturing, and controls
- Alternative routes of epinephrine administration
- Conclusions

FDA History



- **1901:** Parke Davis & Co. first marketed Adrenalin® (epinephrine), predating all major federal drug regulations
 - Epinephrine available as marketed, unapproved product

History of Epinephrine Autoinjectors

- 1970s: Sheldon Kaplan, et al./Survival Technology invented auto-injector devices for medical and military uses
 - Application to epinephrine administration led to first epinephrine approval (EpiPen)

United States Patent [19]

Kaplan et al.

[11] 4,031,893

[45] June 28, 1977

[54] HYPODERMIC INJECTION DEVICE HAVING MEANS FOR VARYING THE MEDICAMENT CAPACITY THEREOF

[75] Inventors: Sheldon Kaplan, Potomac; George B. Calkins; Stanley J. Sarnoff, both of Bethesda; N. Lawrence Dalling, Wheaton, all of Md.

[73] Assignee: Survival Technology, Inc., Bethesda, Md.

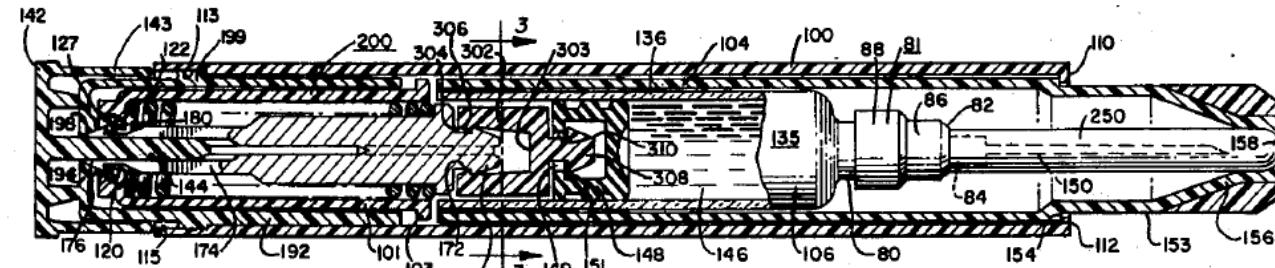
[22] Filed: May 14, 1976

[21] Appl. No.: 686,636

Primary Examiner—John D. Yasko
Attorney, Agent, or Firm—Witherspoon, Lane & Hargest

ABSTRACT

A hypodermic injection device comprising a cartridge holder having a cylindrical body open at one end and closed at the other end, the closed end being provided with an aperture, a cartridge with the holder, the cartridge including an ampoule having a cylindrical sleeve open at one end and having a necked portion at the other end to receive a hub mounting a cannula, the cannula facing the apertured end of the cylindrical



Approved Epinephrine Injection Products for Treatment of Anaphylaxis



Product	Year of Approval	Dosage Strength	Indicated Weight
Autoinjectors			
EpiPen/EpiPen Jr	1987	0.15 mg/injection 0.3 mg/injection	15 to < 30 kg ≥ 30 kg
Adrenaclick	2009	0.15 mg/injection 0.3 mg/injection	15 to < 30 kg ≥ 30 kg
Auvi-Q	2012	0.1 mg/injection 0.15 mg/injection 0.3 mg/injection	7.5 to < 15 kg 15 to < 30 kg ≥ 30 kg
Generic epinephrine injection	2018	0.15 mg/injection 0.3 mg/injection	15 to < 30 kg ≥ 30 kg
Pre-Filled Syringe			
Symjepi	2017	0.3 mg/injection	≥ 30 kg
Vial-Syringe (Medical Setting)			
Adrenalin and other epinephrine injections	2012	1 mg/mL	all

Approval of Epinephrine Autoinjectors



- Dose and route of administration supported by >100 years of use and published literature
- Accepted as standard of care for the treatment of anaphylaxis- efficacy and safety
- Autoinjectors are combination drug-device products; review based on:
 - Device review- 99.999% reliable (5- 9s)
 - Product quality and manufacturing review
 - Human factors review
 - Pharmacokinetic data is not required for approval
 - Clinical efficacy studies are not required, and have not been conducted to support approval for any approved epinephrine product

Labeled Risks of Epinephrine



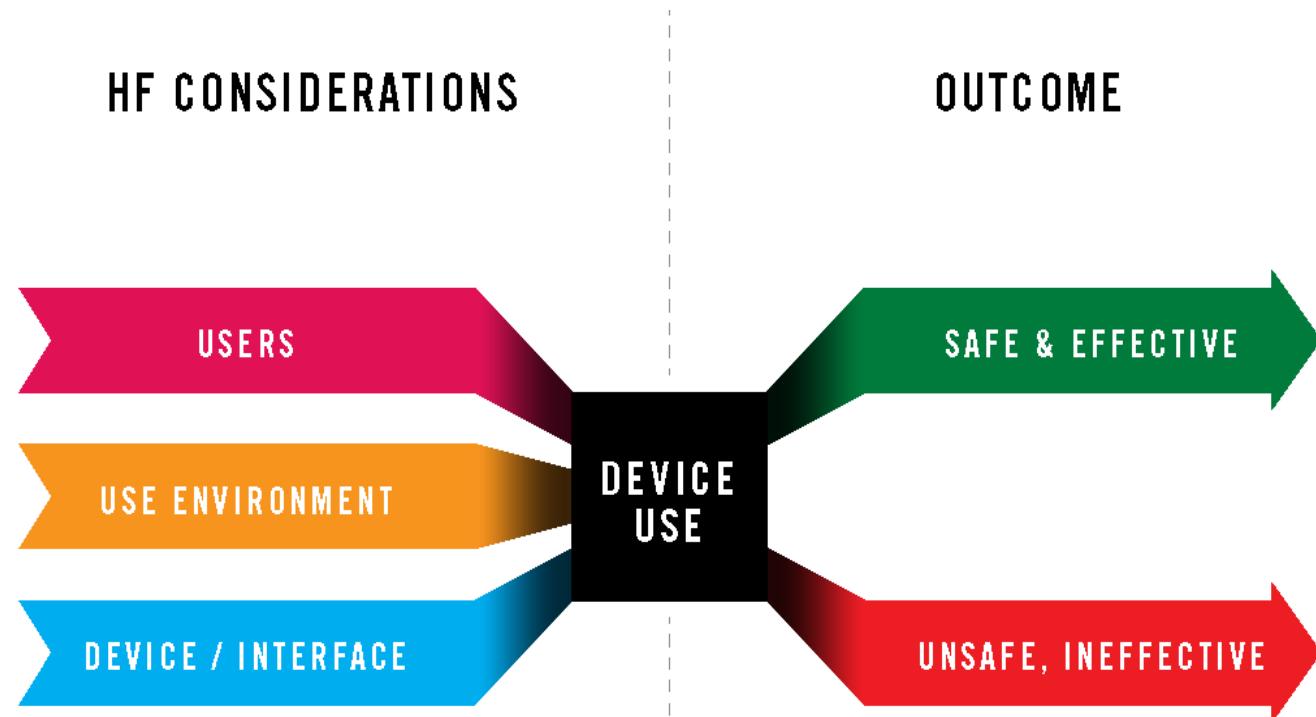
- Cardiovascular
 - Angina, arrhythmias (including fatal ventricular fibrillation), cerebral hemorrhage, hypertension, pallor, palpitations, tachyarrhythmia, tachycardia, vasoconstriction, ventricular ectopy, and stress cardiomyopathy
- Metabolism and Nutrition Disorders
 - Transient hyperglycemia, sweating
- Neurological
 - Disorientation, impaired memory, panic, psychomotor agitation, sleepiness, tingling, weakness
- Psychiatric
 - Anxiety, apprehensiveness, restlessness
- Respiratory
 - Respiratory difficulties

HUMAN FACTORS CONSIDERATIONS

What is 'Human Factors'?



“Ergonomics (or human factors (HF)) is the scientific discipline concerned with the **understanding of interactions among humans and other elements of a system**, and the profession that applies theory, principles, data and methods to design in order to optimize human well-being and overall system performance.”



Human Factors Validation Studies

- Systematic collection of actual use data from representative participants in realistic situations
- Help determine whether users can safely and correctly perform tasks involved in using the product
- Characterize risks and develop mitigation strategies
- Should be conducted before product is submitted for approval, before any product modifications, or additions to a product line
 - Studies are generally small in size and short in duration (as compared to clinical studies)

CHEMISTRY, MANUFACTURING, AND CONTROLS

Chemistry, Manufacturing, and Controls (CMC)



- Epinephrine readily oxidizes when exposed to air, light, and temperature changes creating multiple degradants, which must be monitored for safety
- Acidic conditions promote the conversion of the active L-form epinephrine to inactive D-form, reducing effectiveness
- Medication may contain too much inactive form or harmful impurities to be reliably effective

Contd.

- Manufacturers must provide stability testing data demonstrating the product maintains strength, quality, and purity throughout its shelf-life
- FDA examines epinephrine concentration, impurity levels, degradation products, and antioxidant content
- Testing must account for various storage conditions that affect medication stability
- FDA sets conservative expiration dates based on rigorous testing standards to ensure efficacy and safety

Potential Development Strategies to Address *R*-Epinephrine Solution Instability



- Explore new routes of administration (e.g., nasal, sublingual) that may not require solution formulations
- Develop dosage forms with dry formulations
- Employ prodrug strategies
- Use of complexing agents (e.g., crown ethers, β -cyclodextrin) to reduce *R*-epinephrine's susceptibility to degradation in solution
- Explore use of non-sulfite antioxidants
- Use excipients with low levels of oxidants and metal ions

ALTERNATIVE ROUTES OF EPINEPHRINE ADMINISTRATION

Alternative Routes of Epinephrine Administration

- Alternative routes explored include:
 - Intranasal
 - Sublingual
 - Inhaled
- Potential Advantages
 - Improved compliance; earlier administration; higher carriage rate
- Limitations
 - Local adverse effects; diminished depot effect; impact of mucosal abnormalities on absorption; challenges administering in anaphylaxis (effort-dependent in some cases)

Alternative Routes for Epinephrine Administration Contd.



- Regulatory review:
 - Efficacy based on $PK \geq PK$ for approved epinephrine injection products, with supportive hemodynamic PD (HR, SBP, DBP)
 - Systemic safety based on PK bracketing between PK for approved injection products
 - Local safety based on adverse events reported during development programs
 - PK/PD studies performed in healthy volunteers and in allergic patients with local allergic reactions
 - No clinical efficacy studies required
 - Approach discussed at Pulmonary-Allergy AC meeting on May 11, 2023

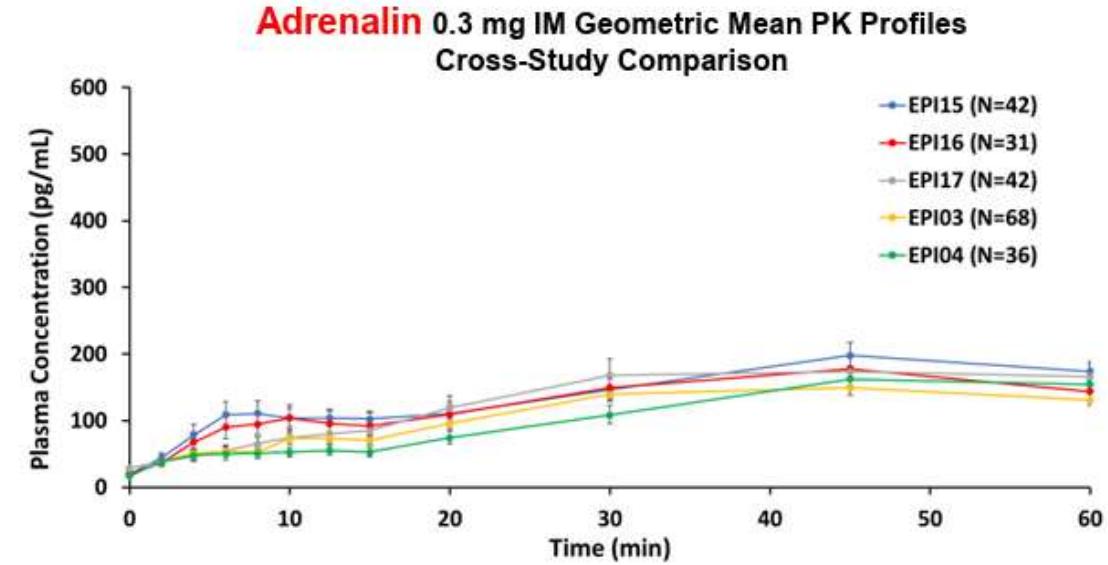
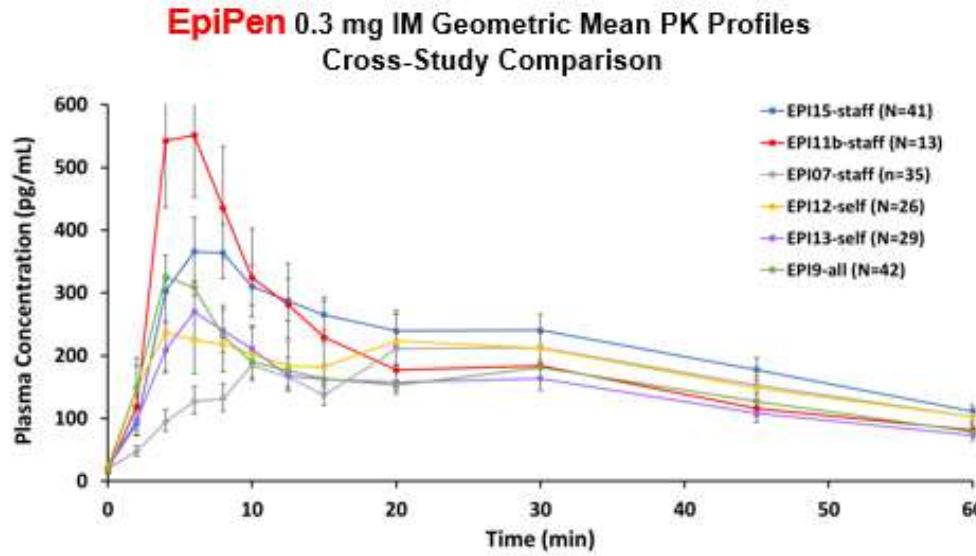
Abbreviations: AC, advisory committee; DBP, diastolic blood pressure; HR, heart rate; PD, pharmacodynamic; PK, pharmacokinetic; SBP, systolic blood pressure

Challenges with Regulatory Review of Alternative Routes of Epinephrine



- Limited PK and PD data, and most in healthy volunteers
- No dose ranging studies for epinephrine injection- optimal dose in the setting of anaphylaxis is not established
- PK of epinephrine injection products is highly variable
 - Impact of needle length on delivery
 - Impact of device (autoinjector versus vial-syringe) on delivery- force of injection, angle, etc.
 - Others?

Pharmacokinetics for Epinephrine Injection Products



- Autoinjectors (EpiPen) with early Tmax and higher Cmax, possibly related to force and speed of administration
- Manual syringe (Adrenalin) administration with late Tmax and lower Cmax compared to autoinjectors
- Biphasic absorption has been reported
- High intra- and inter-subject variability

Approved Epinephrine Products



Product	Year of Approval	Dosage Strength	Indicated Weight
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Pre-Filled Syringe			
Symjepi	2017	0.3 mg/injection	≥ 30 kg
Vial-Syringe (Medical Setting)			
Adrenalin and other epinephrine injections	2012	1 mg/mL	all
Epinephrine nasal spray			
Neffy	2024	1 mg/spray 2 mg/spray	15 to < 30 kg ≥ 30 kg

Conclusions



- Epinephrine predates modern drug regulations
- Efficacy and safety relies on \geq 100 years of clinical use and literature
- Epinephrine injection products require human factors, device reliability, and chemistry, manufacturing, and controls to support approval
- Alternative routes of epinephrine approval based on PK bridging with supportive PD to approved epinephrine injection products resulting in approval of epinephrine nasal spray





Switching a Drug from Prescription-Only Status to Nonprescription Status, with Some Considerations for Epinephrine

Karen Minerve Murry, MD, FACE
Acting Director, Office of Nonprescription Drugs
Office of New Drugs
Center for Drug Evaluation and Research
U.S. Food and Drug Administration

When is a Drug Considered Nonprescription?



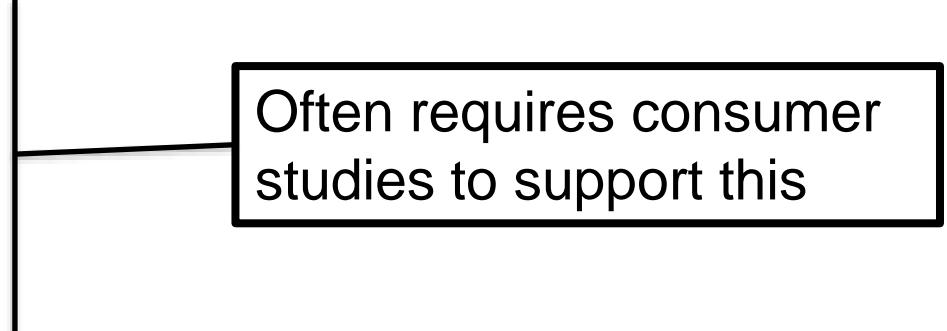
Durham-Humphrey Amendment (1951)

Establishment of Two Drug Classes

- Prescription (Rx) Legend
 - Requires practitioner supervision, because of toxicity or potentiality for harmful effect, or method of use
 - Labeling indicates that it is by prescription only
- Nonprescription (Over-the-Counter (OTC))
 - Drugs that do not meet the definition for Rx

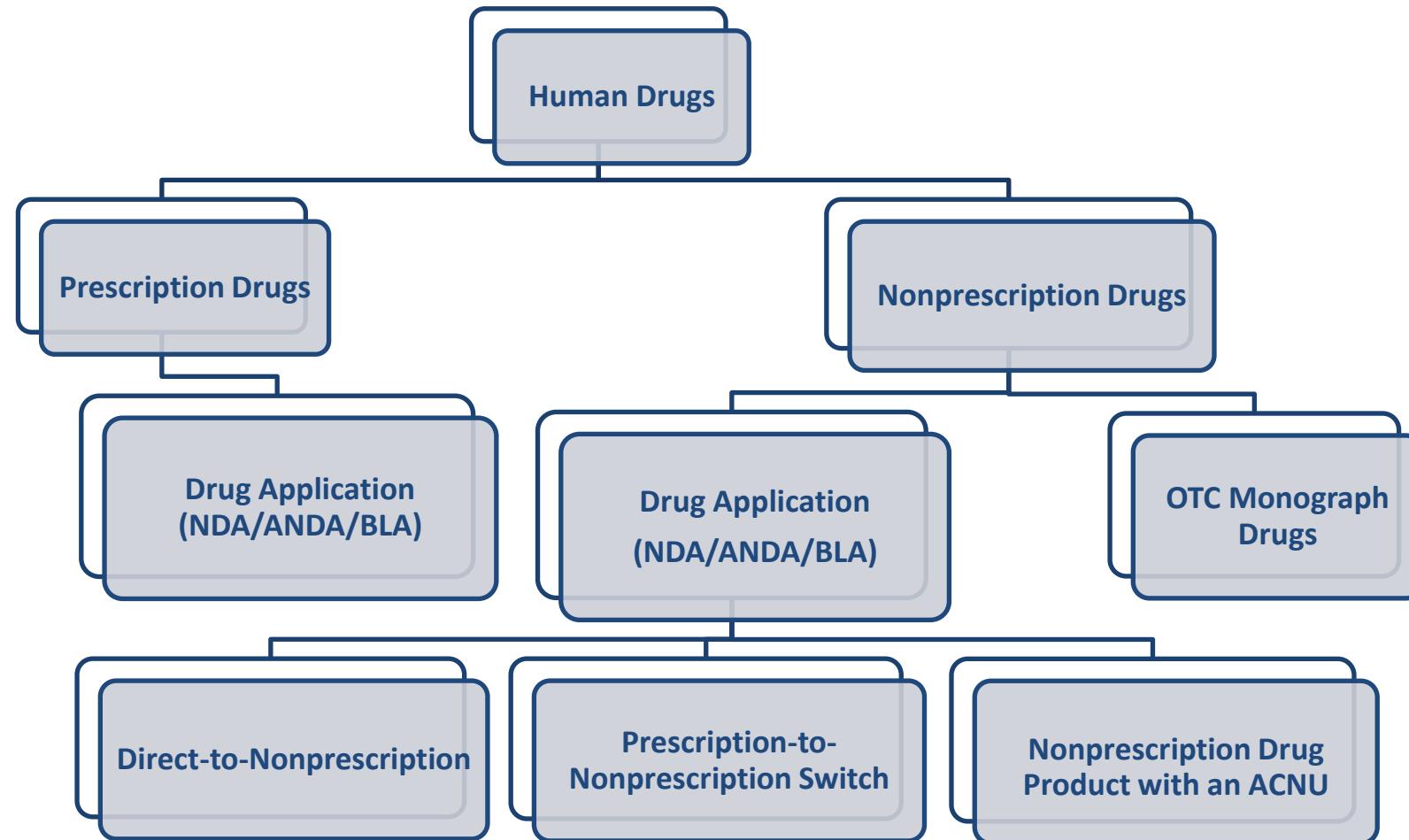
Characteristics of Nonprescription Drug Products

- Safety margin is such that the benefits of nonprescription availability outweigh the risks
- Consumer can self-diagnose, self-treat, and self-manage the condition being treated
- Low potential for misuse and abuse
- Does not require a healthcare practitioner for safe and appropriate use
- Labeling is adequate to enable consumers to:
 - Self-diagnose and self-select
 - Use properly as directed by the label
 - Know when to stop use or contact a healthcare practitioner



Often requires consumer studies to support this

Drug Development Pathways



Abbreviations: ACNU, Additional condition for nonprescription use; ANDA, Abbreviated New Drug Application; BLA, Biological License Application; NDA, New Drug Application; OTC, Over-the-Counter

Development Programs for Prescription-to-Nonprescription Switch



- Often rely on safety and efficacy established for the prescription product
- New clinical studies may be required, such as when proposing a new indication or a new patient population
- Need to “translate” key elements of the prescription label into consumer-friendly terms
- Consumer studies are needed to evaluate the suitability of the product for use in the nonprescription setting
- Issues to be addressed are identified from prescription label and clinical use of product

Drug Facts Labeling



- Nonprescription drug products must comply with Code of Federal Regulations labeling requirements, including meeting Drug Facts labeling (DFL) requirements
- The DFL is intended to help enable consumers to self-select appropriately and use the nonprescription drug product safely and effectively, without assistance from a healthcare practitioner

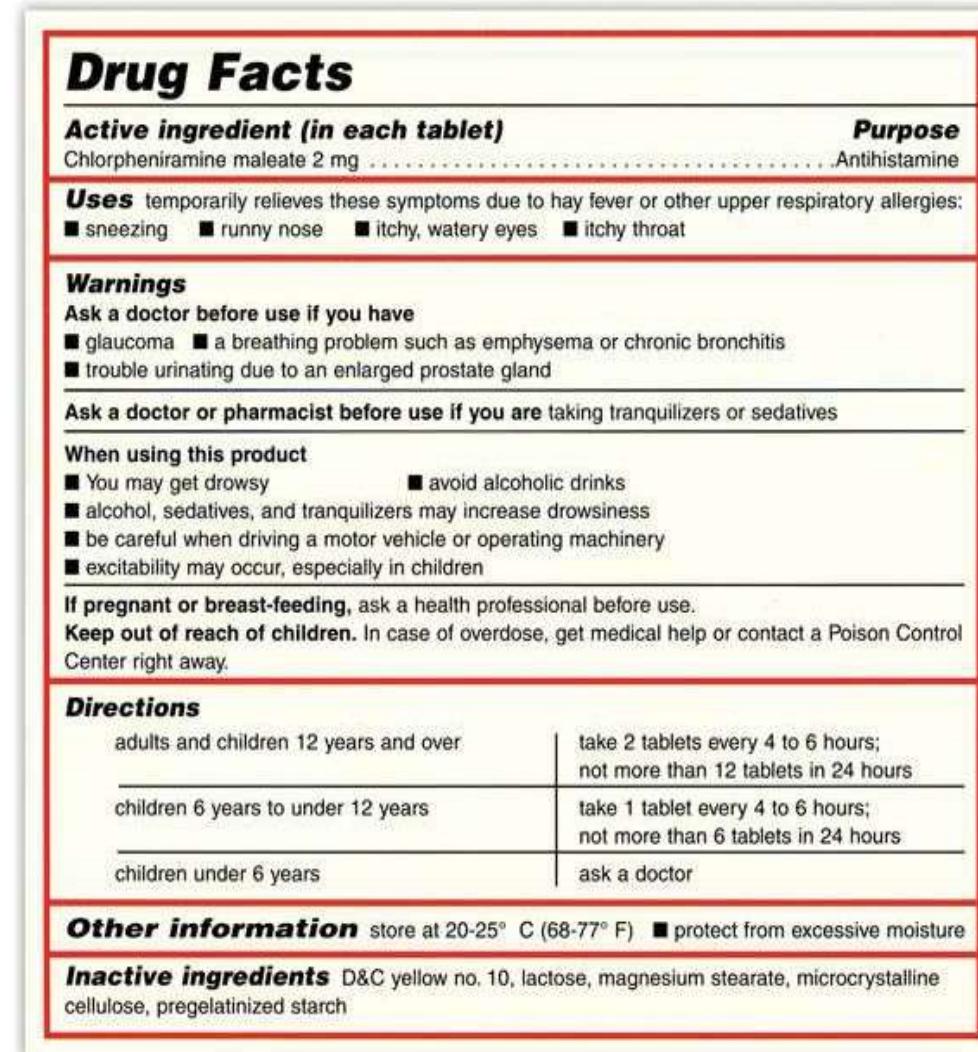
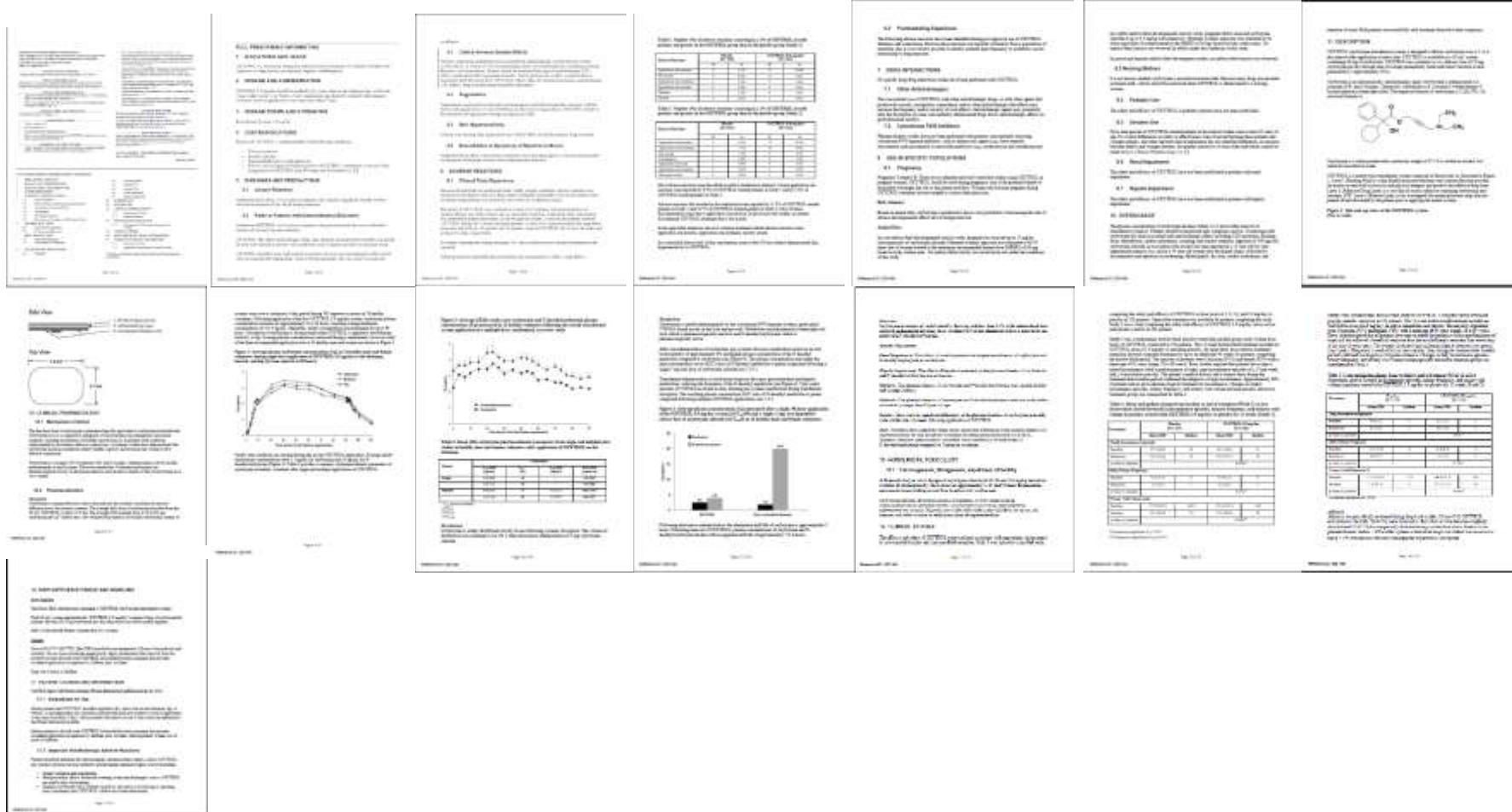


Image found at:

<http://www.fda.gov/Drugs/ResourcesForYou/Consumers/ucm143551.htm>

Rx Labeling is Typically Lengthy and Challenging to Condense into a Consumer-Friendly DFL



Nonprescription Consumer Studies



Label Comprehension Study

- Understanding the key label message

Self- Selection Study

- Choosing the right product

Actual Use Study

- Using according to labeled directions

Human Factors Study

- Interacting with the product

What Dosage Forms are Suitable for Prescription-to-Nonprescription Switch?



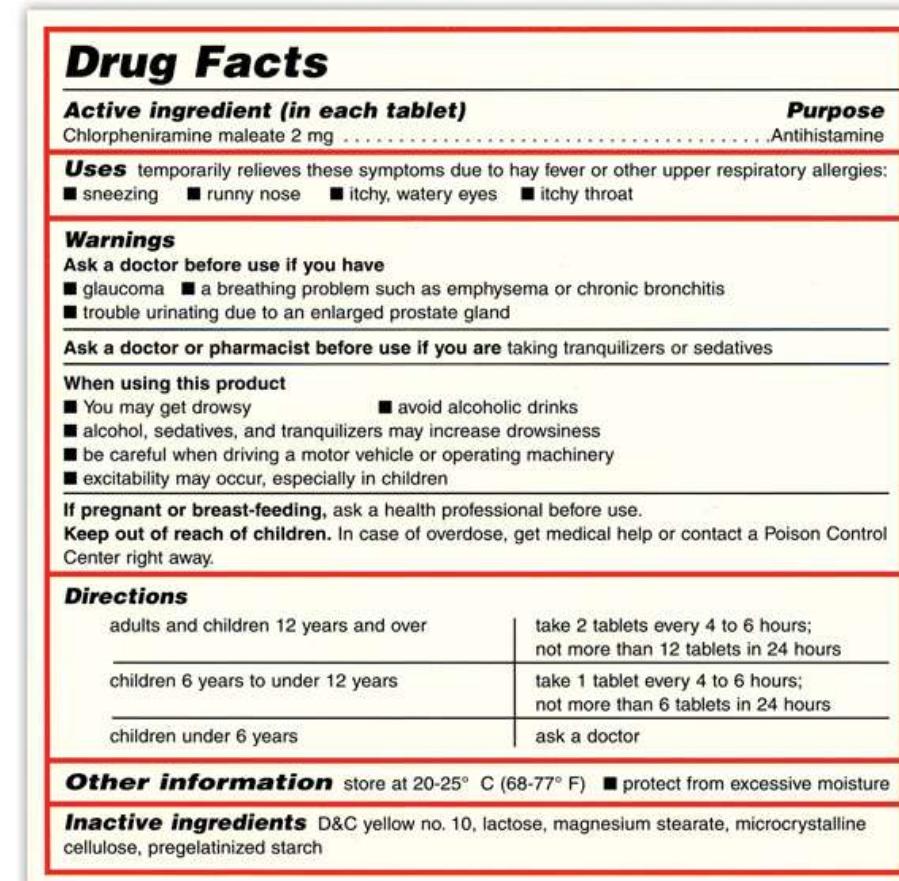
- Any approved dosage form is a possible switch candidate
- Sponsor must provide adequate data to support that consumers can correctly administer the drug by following the directions
- If there are unique attributes for administration of the drug, the sponsor needs to develop and test a user-friendly format for the labeling/packaging

Challenges for “Traditional” Prescription-to-Nonprescription Switch

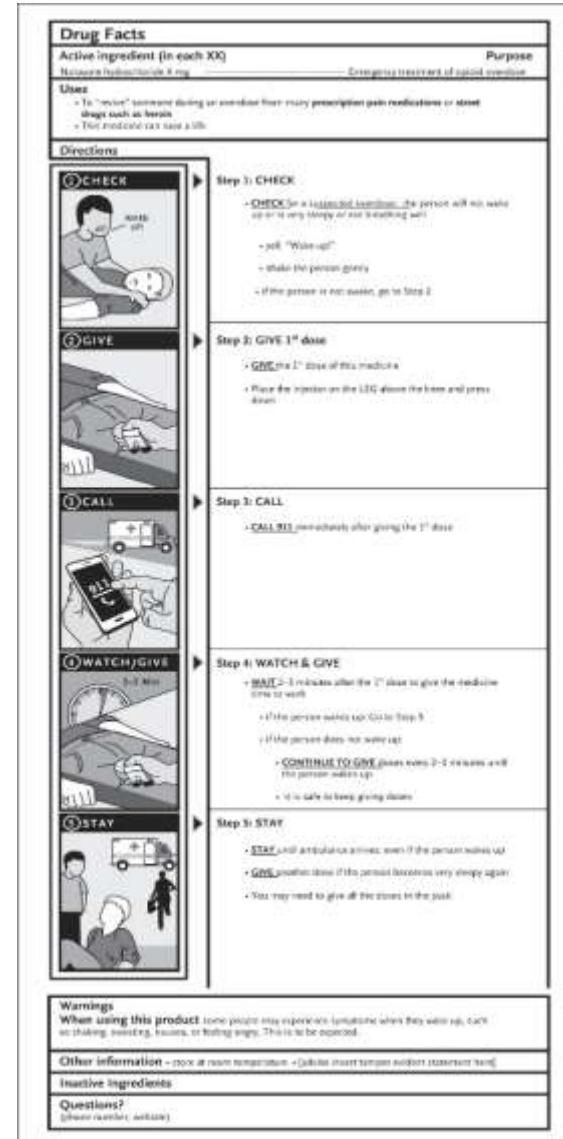


Until recently:

- Traditionally had to rely on nonprescription labeling alone for purchase decision, and for safe/effective use
- The existing regulations made it difficult for FDA to consider other means of improving safe and effective use



Potentially Useful Prior FDA Initiative- Nonprescription Naloxone



Possible Use of Technology to Address Nonprescription Labeling Challenges



- In what other ways can information be delivered to consumers to ensure appropriate self-selection and appropriate use of nonprescription drug products?
- How can technology be leveraged to develop innovative approaches to nonprescription drug products?

**DEPARTMENT OF HEALTH AND
HUMAN SERVICES**

Food and Drug Administration

21 CFR Parts 201 and 314

[Docket No. FDA-2021-N-0862]

RIN 0910-AH62

**Nonprescription Drug Product With an
Additional Condition for
Nonprescription Use**

AGENCY: Food and Drug Administration,
Department of Health and Human
Services (HHS).

ACTION: Final rule.

**Additional Condition for
Nonprescription Use (ACNU) Rule**



- Final rule to increase options for the development and marketing of safe and effective nonprescription drug products
- Published December 26, 2024; effective date May 27, 2025
- Establishes requirements for a nonprescription drug product with an additional condition for nonprescription use (ACNU) that an applicant must implement to ensure appropriate self-selection or appropriate actual use, or both, by consumers without the supervision of a healthcare practitioner

Possible Challenges for Development of a Nonprescription Epinephrine Drug Product



We would like input on possible challenges, but here are a few to begin with:

- Serious adverse effects, particularly cardiovascular
- Given in a stressful emergency situation
- Possible challenges in condensing lengthy Rx label into small but adequate DFL
- User might not read the labeling ahead of time- must be able to figure it out quickly
- Often given by the person experiencing the allergic reaction, but might be given by a bystander with no prior experience with epinephrine
- Unforeseen challenges?

We want to hear a wide array of ideas for expanding epinephrine access, with a possible future nonprescription drug product being only one of the areas of discussion.



**U.S. FOOD & DRUG
ADMINISTRATION**

Session 2: Regulatory Pathways for Epinephrine Products, Including Considerations for Prescription and Nonprescription Development

Moderator:

- **Thomas Roades**, Duke-Margolis Institute for Health Policy

Panelists:

- **Carla Davis**, Howard University
- **Paul Greenberger**, Northwestern University
- **Alice Hoyt**, Code Ana
- **Karen Murry**, U.S. Food and Drug Administration
- **Miya Paterniti**, U.S. Food and Drug Administration
- **Kelly Stone**, U.S. Food and Drug Administration



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#Epi



Moderated Discussion and Q&A

Moderator: Thomas Roades, Duke-Margolis Institute for Health Policy

Lunch Break

Our program will resume at 1:20 pm ET

Public Comment Session

Moderator: Brian Canter, Duke-Margolis Institute for Health Policy

Session 3: Current Accessibility to Epinephrine for Treating Anaphylaxis

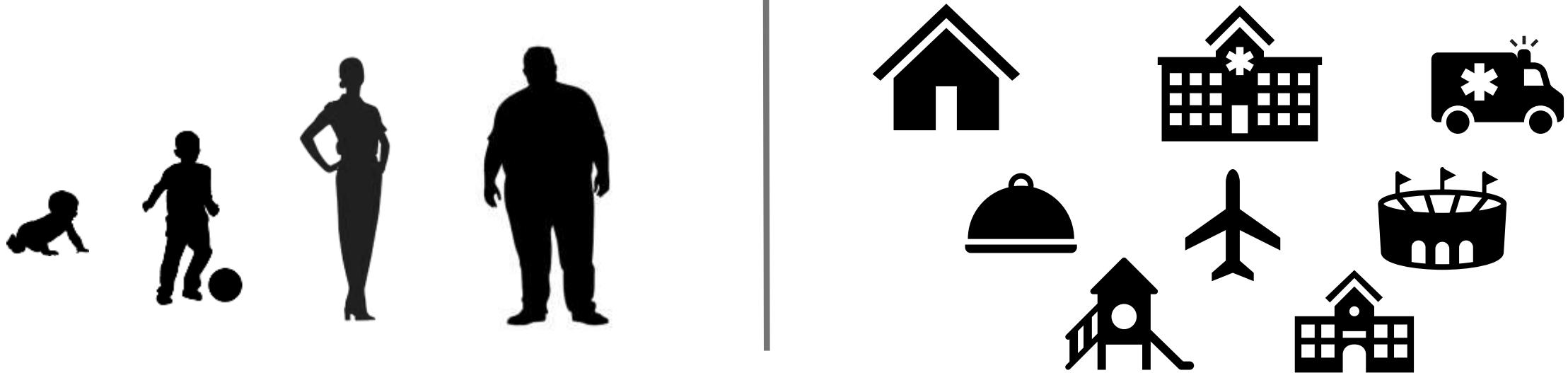
Moderator: Michael Pistiner, Massachusetts General Hospital for Children

Accessibility to Epinephrine for Treating Anaphylaxis

Patient Factors



Setting



Cost/Insurance/Availability

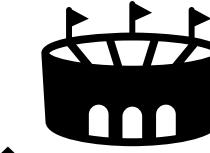


Training/Preparation



Accessibility to Epinephrine for Treating Anaphylaxis

Patient Factors



Cost/Insurance/Availability



Training/Preparation



Session 3: Current Accessibility to Epinephrine for Treating Anaphylaxis

Moderator:

- **Michael Pistiner**, Massachusetts General Hospital for Children

Panelists:

- **Kelly Cleary**, Food Allergy Research and Education
- **Ruchi Gupta**, Northwestern University
- **Linda Herbert**, Children's National Hospital
- **Charity Luiskutty**, Food Allergy & Anaphylaxis Connection Team
- **Christopher Warren**, Northwestern University



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Moderated Discussion and Q&A

Moderator: Michael Pistiner, Massachusetts General Hospital for Children

Break

Our program will resume at 3:20 pm ET

Session 4: Opportunities to Enhance Access to and Use of Epinephrine

Moderator: Julie Wang, Icahn School of Medicine at Mount Sinai

Session 4: Opportunities to Enhance Access to and Use of Epinephrine

Moderator:

- **Julie Wang**, Icahn School of Medicine at Mount Sinai

Panelists:

- **Timothy Dribin**, Cincinnati Children's Hospital Medical Center
- **Matthew Greenhawt**, Asthma and Allergy Foundation of America
- **Nissa Shaffi**, Allergy & Asthma Network
- **Marcus Shaker**, Dartmouth College



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Moderated Discussion and Q&A

Moderator: Julie Wang, Icahn School of Medicine at Mount Sinai

Closing Remarks

Karen Murry, U.S. Food and Drug Administration

Thank You!

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