



**COMMITTEE FOR MEDICAL PRODUCT FOR HUMAN USE  
(CHMP)**

DRAFT

**GUIDELINE ON THE CLINICAL INVESTIGATION OF MEDICINAL PRODUCTS FOR  
THE TREATMENT OF ATTENTION DEFICIT HYPERACTIVITY DISORDER (ADHD)**

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**KEYWORDS**

*ADHD, children, adults, psychostimulants*

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## 1 EXECUTIVE SUMMARY

2 Attention Deficit Hyperactivity Disorder (ADHD) is among the most common disorders in child- and  
3 adolescent psychiatry. Its impact on learning and development is considered substantial. The benefit of  
4 pharmacotherapy has empirically been proven, and several products are on the market. Although  
5 primarily a disorder restricted to childhood and adolescence, signs and symptoms may not be self-  
6 limiting but to persist into adulthood. These new insights in the ADHD syndrome are a challenge in  
7 the field of drug development. However, this Guideline is intended to provide guidance on the  
8 evaluation of new medicinal products in ADHD with focus on the childhood onset. It is the first  
9 guideline written in psychiatry to address a psychiatric disorder from this perspective, and it should be  
10 read in conjunction with other EMEA and ICH guidelines, which may apply to similar conditions and  
11 patient populations.

### 12 1. INTRODUCTION

13 Attention Deficit Hyperactivity Disorder, ADHD, is a well defined disorder with core features of  
14 inattention, hyperactivity, and impulsivity, but also impairment in executive functions. It has its origin  
15 in childhood and is often diagnosed for the first time in school aged children, because of learning  
16 problems and problems with social behaviour. Treatment is therefore directed towards improvement  
17 of attention and reduction of hyperactivity/impulsivity in order to be able to focus on tasks and  
18 performance. Methylphenidate is among the first effective drugs reported to treat the 'hyperkinetic  
19 syndrome' in the 1950s. Although often regarded as the standard of treatment, new products have  
20 come to the market, e.g. atomoxetine with a different mode of action. Psycho education, and psycho  
21 education in combination with pharmacotherapy are usually the standard of care in Europe, and  
22 behavioural treatment is often provided to sustain success. Within this context, cognitive treatment,  
23 neurofeedback training and dietary measures<sup>1</sup> can be regarded as potential, but not yet evidence based  
24 strategies.

25 It has long been acknowledged that the core symptoms of ADHD ameliorate with age. It has recently  
26 been recognized that symptoms may persist into adulthood, thereby extending treatment to this age  
27 group. Usually, inattention and restlessness predominate at adult age, interfering with work and social  
28 functioning. As ADHD is a chronic disorder, long term treatment can be foreseen, thereby  
29 emphasizing the need for long term safety data in an otherwise healthy patient group.

#### 30 1.1 Diagnosis

31 ADHD first comes to attention in children and adolescents, and is characterized by a persistent pattern  
32 of inattention, hyperactivity-impulsivity that causes impairment in school performance and social  
33 functioning. According to DSM-IV-TR, six out of nine symptoms of either the inattention or  
34 hyperactivity-impulsivity domain should have persisted for 6 months (criterion A). Some symptoms  
35 should present before the age of 7, and some impairment in school, work or social environment that is  
36 present at the time of diagnosis (criterion B-D). Symptoms should not be secondary to other  
37 psychiatric disorders (criterion E). The majority of cases present with criteria for both inattention and  
38 hyperactivity-impulsivity, but either symptom domain may predominate, justifying classification in  
39 subtypes, i.e. combined type, predominantly inattentive and predominantly hyperactive-impulsive.

40 The ICD-10 classifies ADHD among the hyperkinetic disorders.

41 There are no diagnostic tools other than the rating of symptoms that are characteristic for ADHD.  
42 Morphological differences observed with magnetic resonance imaging techniques (MRI<sup>2</sup>) and  
43 functional MRI (fMRI<sup>3</sup>) as well as electrophysiological differences, differences in cognitive

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<sup>1</sup> Pelsser LM, Frankena K, Toorman J et al. 2008. A randomised controlled trial into the effect of food on ADHD. *Eur Child and Adolesc Psychiatry*, to be completed

<sup>2</sup> Hutchinson A, Mathias J et al. 2008. Corpus callosum morphology in children and adolescents with Attention Deficit Hyperactivity Disorder: A meta-analytic review. *Neuropsychology* 22 (3): 341-9

<sup>3</sup> Rubia K, Halari R et al. 2008. Dissociated Functional Brain Abnormalities of Inhibition in Boys with Pure Conduct Disorder and in Boys with Pure Attention Deficit Hyperactivity Disorder. *Am J Psychiatry* in press.

44 performance, and DNA polymorphisms<sup>4</sup> are all subject of thorough investigation, yet far from  
45 potential use as (bio)marker.

## 46 **1.2 Differential Diagnosis**

47 ADHD should be discriminated from otherwise 'normal' behaviour in active children, but also from  
48 disruptive behaviour in children due to low- (mental retardation) or high intelligence (gifted children)  
49 when there is no 'match' between demands and capabilities. Although often co-morbid to  
50 Oppositional Defiant- and Conduct Disorder, ADHD should be discriminated from oppositional  
51 behaviour due to repeated failure in performance and the incapability of living up to expectations.  
52 Differentiation should be made between ADHD and Stereotypic Movement Disorder (tic-disorders),  
53 where the hyperactivity is more focussed to specific body parts. ADHD, if not co-morbid, should be  
54 discriminated from other mental disorders that share similar symptoms, e.g. mood and anxiety, and  
55 personality disorders. In specific bipolar disorder in children should not be mixed up with ADHD. The  
56 age of onset of first symptoms (< 7 years of age) should be kept as one of the hallmarks for  
57 differentiation. ADHD should not be diagnosed if symptoms present in the context of a pervasive  
58 developmental- or psychotic disorder. Nor should symptoms be due to the use of medication.

## 59 **1.3 Epidemiology and Co-morbidity**

60 ADHD is one of the most prevalent disorders of childhood, its worldwide prevalence being estimated  
61 at approximately 5-6%<sup>5</sup>. Prevalence rates, however, vary with the source referred to. The DSM-IV-TR  
62 states a slightly higher rate (3-7%), due to the inclusion of ratings of both subtypes. Prevalence rates in  
63 adolescents and adults have been less investigated. In a Finish Cohort Study, the prevalence rate for  
64 ADHD in adolescents was as high as 8.5%, the majority of cases being the inattention subtype<sup>6</sup>.  
65 Comparable rates are reported in other studies. For adults, an average prevalence rate of 3.4% has  
66 been reported in a cross-national survey<sup>7</sup>, with the lowest rate in lower-income countries (1.9%)  
67 compared to the higher- income countries (4.2%).

68 At least in children, ADHD is more frequent in boys than in girls. In clinical samples, the average  
69 male-to-female ratio of 5:1 has been found, but in epidemiological samples ratio's of 3:1 or 2:1 are  
70 mentioned<sup>8</sup>. The figures often depend on the (sub)type investigated. For the inattentive type, gender  
71 difference is less clear.

72 In child-psychiatry, co-morbidity is almost inevitable in diagnostics<sup>9,10</sup>. As a result, co-morbidity is  
73 high in ADHD. Only 30% of cases are pure ADHD. The most apparent co-morbid conditions are  
74 Oppositional Defiant Disorder and Conduct Disorder. A variety of other disorders may be co-morbid  
75 (e.g. mood, and anxiety disorders, learning disorders, Tourette's syndrome), but should also be  
76 differentiated from ADHD. In older subjects, substance abuse is often found to be co-morbid.

## 77 **2. SCOPE**

78 This Guideline is intended to assist applicants during the development of medicinal products intended  
79 for the treatment of attention deficit hyperactivity disorder (ADHD), independent of the class of

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<sup>4</sup> Waldman ID, Nigg JT et al. 2006. The adrenergic receptor alpha-2A gene (ADRA2A) and neuropsychological executive functions as putative endophenotypes for childhood ADHD. *Cog Affect Behav Neurosci* 6 (1): 18-20

<sup>5</sup> Polanczyk G, Silva de Lima M et al. 2007. The worldwide prevalence of ADHD: A Systematic Review and Metaregression Analysis. *Am J Psychiatry* 164:942-948

<sup>6</sup> Smalley SL, McGough JJ et al. 2007. Prevalence and psychiatric comorbidity of Attention Deficit Hyperactivity Disorder in an adolescent Finish population. *J Am Acad Child and Adolesc Psychiatry* 46 (12): 1575-83

<sup>7</sup> Fayyad J, De Graaf R et al. 2007. Cross-national prevalence and correlates of adult attention-deficit hyperactivity disorder. *British J Psychiatry* 190: 402-09

<sup>8</sup> Staller J, and Farone SV 2006. Attention-deficit hyperactivity disorder in girls: epidemiology and management. *CNS Drugs* 20 (2): 107-23.

<sup>9</sup> Caron C and Rutter M. 1991. Comorbidity in Child Psychopathology: Concepts, Issues and Research Strategies. *J Child Psychol and Psychiat* 32 (7): 1063-80.

<sup>10</sup> Gillberg C, Gillberg IC et al. 2004. Co existing disorders in ADHD: implications for diagnosis and intervention. *Eur Child Adolesc Psychiatry Suppl* 1: 180-92

80 product under investigation. It is only guidance; any deviation from guidelines should be explained  
81 and discussed in the Clinical Overview.

### 82 **3. LEGAL BASIS**

83 This Guideline is intended to provide guidance on the evaluation of new medicinal products in  
84 attention deficit hyperactivity disorder (ADHD). It should be read in conjunction with Directive  
85 2001/83/EC, as amended, and all other pertinent elements outlined in current and future EU and ICH  
86 guidelines and regulations, especially those on:

- 87 - Dose-Response Information to Support Drug Registration – CPMP/ICH/378/95 (ICH E4),
- 88 - Statistical Principles for Clinical Trials – CPMP/ICH/363/96 (ICH E9),
- 89 - Choice of Control Group in Clinical Trials – CPMP/ICH/364/96 (ICH E10),
- 90 - Adjustment for Baseline covariate – CPMP/EWP/2863/99,
- 91 - Missing data – CPMP/EWP/177/99,
- 92 - Extent of Population Exposure to Assess Clinical Safety – CPMP/ICH/375/95 (ICH E1A),
- 93 - Clinical investigation of medicinal products in the paediatric population – CPMP/ICH/2711/99  
94 (ICH E11),
- 95 - Pharmacokinetic studies in man (EudraLex vol. 3C C3A).
- 96 - Guideline on the need for non-clinical testing in juvenile animals of pharmaceuticals for  
97 paediatric indications (CHMP/SWP/169215/2005)

### 98 **4. PATIENTS CHARACTERISTICS AND SELECTION OF PATIENTS**

#### 99 **4.1 Diagnosis and Inclusion Criteria**

100 The disorder should be classified according to an internationally acknowledged classification system,  
101 preferably to the latest version of the DSM, using the diagnostic criteria herein. The inclusion of  
102 subtypes should be specified. The use of a severity rating scale or cognitive performance task is  
103 additional, but should not replace a clinical diagnosis. Diagnosis should be made by a psychiatrist or  
104 by a non-psychiatrist physician experienced in ADHD and co-morbid diagnoses, and who is trained in  
105 the use of structured interviews to confirm the diagnosis and exclude relevant co-morbid disorders.

106 The age for inclusion should cover the range from 6 to 18 years of age, and children and adolescents  
107 should be separated or stratified.

108 Primary studies for dose finding should include patients with ADHD without significant co-  
109 morbidities. Otherwise interpretation of study results may be inconclusive, e.g. treatment effects of a  
110 psycho-stimulant on ADHD with co-morbid disrupted behaviour or treatment effects of an  
111 antidepressant on ADHD with co-morbid mood- or anxiety disorder. In confirmatory trials, the  
112 inclusion of subjects with ADHD and co-morbid ODD/CD is acceptable, as it enables generalization  
113 of the results to the general population.

114 Further descriptive parameters, like severity (e.g. differentiated according to subtype), as well as a  
115 detailed history, e.g. of the duration of ADHD, presentation of first symptoms, degree of functional  
116 impairment and previous treatment outcome, should be recorded. Other characteristics such as male-  
117 to-female ratio, the predominant symptoms of inattention or hyperactivity-impulsivity related to age  
118 and course of disease, as well as the predominant out-patients status of patients should be reflected in  
119 the study population. Co-morbid symptoms (e.g. anxiety, depression) should be rated with proper  
120 scales.

121 Information should be obtained from a reliable informant (parent/caretaker/teacher). In addition to the  
122 diagnostic criteria cut-off scores based on appropriate scales may be used to include patients with a  
123 certain degree of severity to assure sensitivity to change. In pre-pubertal children, self-report may not  
124 be a reliable method for symptom rating. Across the age span of school-aged children (6-18 years),  
125 observer ratings of both parents/caretakers and informants (teachers) should be used in addition to the  
126 clinician ratings. In the case of adolescents, the teacher ratings are not mandatory.

## 127 **4.2 Exclusion Criteria**

128 Excluded should be patients with:

- 129 • another Axis I disorder (co-morbidity) with the exception of ODD/CD (as mentioned for  
130 confirmatory trials), albeit that ADHD should be the primary diagnosis
- 131 • severe co-morbid symptoms such as anxiety, depression
- 132 • a primary Axis II disorder (personality disorder in the case of adult diagnosis)
- 133 • mental retardation
- 134 • a current or recent history of substance abuse disorder (within 6 months of study entry)
- 135 • ongoing formal behavioural, cognitive or cognitive-behavioural therapy that is not part of the  
136 study design
- 137 • ongoing relevant psychotropic co-medication for ADHD (such medication should be washed  
138 out)
- 139 • relevant somatic/neurological disorders that exclude participation because of the  
140 pharmacology of the study drug (e.g. epilepsy)

## 141 **5. METHODS TO ASSESS EFFICACY**

### 142 **5.1 Primary Efficacy Endpoints**

143 Efficacy should be assessed by rating scales. For ADHD many symptom rating scales are available<sup>11</sup>,  
144 the most prominent being the Connors' Rating Scales, and the ADHD Symptoms Rating Scale  
145 (ADHD-SRS). The choice of rating scales should be justified from the test quality criteria (reliability,  
146 validity). The sensitivity for change should be known. Obviously, rating scales should be validated for  
147 the specific age cohorts (children/adolescents). 'Observer' scales, assessed by clinicians should be  
148 taken as primary. Not only a reduction of symptoms should be assessed, but also a functional outcome  
149 should be measured (school performance/social functioning). Beyond health related quality of life  
150 scales, appropriate goal-oriented scales should be developed in this area.

151 Two primary endpoints should be stipulated reflecting the symptomatic and the functional domain.  
152 Improvement should be documented as a difference between baseline and post-treatment score. In  
153 order to allow an estimate of clinical relevance the proportion of responders should be presented. For  
154 this, appropriate cut-off-points on validated rating scales should be defined and justified. The use of  
155 the same rating scale for inclusion, efficacy and responder definition is recommended.

156 In advance and if necessary during the study, raters (e.g. parents/caretakers and teachers) should be  
157 properly trained for assessment of patients with the applied rating scales. Methods should be foreseen  
158 in the study protocol to assess inter-rater reliability.

### 159 **5.2 Secondary Efficacy Endpoints**

160 Ratings from reliable informants (parent/caretaker, and teachers) should be taken as primary  
161 secondary endpoint. Depending on the choice of the assessment used as primary efficacy endpoint,  
162 further, additional, assessments may be used as secondary efficacy endpoints, e.g. global assessments,  
163 and 'subject' rating scales (self-report) in the case of adolescents (for the issue of teacher ratings, see  
164 II.I).

### 165 **5.3 Other Supportive Efficacy Criteria**

166 Exploratory measures, i.e. brain function (fMRI), electrophysiological measures (Evoked Related  
167 Potentials, ERP, and (neuro)cognitive performance are encouraged.

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<sup>11</sup> [www.neurotransmitter.net/adhd scales.html](http://www.neurotransmitter.net/adhd scales.html)

## 168 6. STRATEGY AND DESIGN FEATURES OF CLINICAL TRIALS

### 169 6.1 Early Studies in Man

#### 170 6.1.1 Pharmacodynamics

171 Although there is no specific human model for ADHD, the pharmacodynamics of products can be  
172 tested relative to methylphenidate that has a fast dose dependent effect on ADHD symptoms. Beyond  
173 PD in humans, there are several animal models that can serve as pharmacological model for  
174 ADHD<sup>12,13</sup>.

#### 175 6.1.2 Pharmacokinetics/Interactions

176 The usual pharmacokinetic studies should be performed (see note for guidance on pharmacokinetic  
177 studies in man). Pharmacokinetic studies should be performed for each age cohort separately. The  
178 principle of sparse sampling and modelling techniques should be applied where possible.

179 The note for guidance on drug interactions should be followed to investigate possible pharmacokinetic  
180 and pharmacodynamic interactions. Special interest should be taken in interactions with alcohol and  
181 other CNS active products that are relevant from a safety perspective.

#### 182 6.1.3 Dose Response Studies

183 Randomized, controlled, parallel fixed dose studies, using at least 3 dosages are needed to establish as  
184 far as possible the lower end of the clinical effective dose range as well as the optimal dose. Generally  
185 it is recommended to add a placebo arm as well as an active comparator. When taking  
186 methylphenidate as reference, the duration of trials can be short, i.e. 6 weeks on stable medication, but  
187 the duration may vary dependent on the mode of action of the drug that is expected (fast or slow  
188 onset).

### 189 6.2 Therapeutic Confirmatory Studies

#### 190 6.2.1 Short-term Trials

191 For confirmatory trials randomised, double blind, parallel group studies are necessary. In general  
192 three-arm-studies including placebo and active comparator are required. The duration of the studies  
193 should be at least 6 weeks on stable dose, dependent on the mode of action of the drug. Separate  
194 studies are needed in children and adolescents, and diagnostic instruments should be adjusted likewise.

##### 195 • Choice of Control Group

196 As stated above the test product should be compared with both placebo and an active comparator,  
197 using a three- or multi-arm design. Three-arm studies are highly recommended for internal validation  
198 of the trial. The aim of the study may be superiority over placebo or active comparator, non-inferiority  
199 against active comparator, or at least demonstration of a similar balance between benefit and risk of  
200 the test product in comparison to an acknowledged standard agent.

##### 201 • Run-in Period/Wash-out Period

202 When patients are already treated with a psychoactive compound with impact on ADHD, a washout  
203 period is necessary. Generally a placebo run-in period to exclude placebo responders is not useful as it  
204 may impair generalisation of the results. Any reason to exclude placebo responders should be  
205 discussed.

##### 206 • Methodological Considerations

207 It is important to demonstrate that the effect of the medicinal product is specific for ADHD and is not

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<sup>12</sup> Kostrewa RM, Kostrewa JP et al. 2008. Pharmacological models of ADHD. J Neural Transm 115 (2) 287-98.

<sup>13</sup> Rusell VA. 2007. Reprint of 'Neurobiology of animal models of attention-deficit hyperactivity disorder'. J Neurosci Methods 166 (2): I-IV.

208 due to secondary therapeutic effects on psychiatric co-morbid conditions. Sample size should be  
209 calculated based on an effect size that is clinically relevant. The clinical relevance of the effect  
210 (responders) should be taken into consideration. For details on the statistical analysis refer to the  
211 statistical guideline (ICH 9) as well as the Points to consider document concerning missing values.

212 Efficacy should be demonstrated on ADHD in general. Analysis of effects on subtypes may be  
213 secondary. Whether this may lead to specific claims depends on the acknowledgement of the subtypes  
214 as separate entities. In the latter case the development of specific assessment scales for the different  
215 subtypes is needed.

## 216 **6.2.2 Long-term Trials**

217 Because of the chronic course of ADHD, in addition to the short-term trials demonstration of long-  
218 term efficacy has to be established in at least one well-designed study. This might be done by  
219 prolonging the time of double blind or by a randomised withdrawal design. In the latter design, all  
220 patients receive active treatment. Responders to treatment are subsequently randomized to continue  
221 the investigational drug or to placebo. Patients are followed by at least 6 months for maintenance of  
222 effect.

223 In these studies efficacy usually is expressed as number of patients worsening (relapsing) and/or time  
224 to this event. Both efficacy criteria should be submitted. Nevertheless, in the study protocol it has to  
225 be justified whether one or both are used as primary endpoint. The analysis should carefully consider  
226 the possible biases arising from drop-outs (not because of relapse) and the statistical methods of  
227 dealing with them.

228 Worsening or relapse has to be defined in the protocol and should be a clinical relevant increase of  
229 symptoms, scored on a validated rating scale at one or more visits.

230 For withdrawal studies, the protocol should include specific measures to prevent complications of the  
231 disease (e.g. serious worsening, discontinuations symptoms) like close monitoring and the possibility  
232 to use rescue medication or to switch deteriorating patients to appropriate treatment with reference  
233 compounds.

## 234 **6.3 Studies in Special Populations**

235 ADHD is recognized to be persistent into adulthood. Symptoms may experience a shift from  
236 inattention and hyperactivity/impulsivity into inattention and restlessness. Yet, the syndrome is  
237 considered to have had its origin in childhood. Symptoms and co-morbidity may be different, and  
238 there is no experience with elderly. Hence, the special population is limited to adults (<65 years of  
239 age), and efficacy and safety should be demonstrated in this population separately.

240 Similarly, there is little experience with pre-school children (< 6 years of age). Yet, pharmacotherapy  
241 may be worth exploring. Adjusted assessment tools are needed, as well as proper dosing that can not  
242 always be extrapolated from older age groups. The benefit/risk may be different considering the safety  
243 of psychotropic drugs on brain maturity and development, and the improved functioning that is the  
244 objective of treatment.

### 245 **6.3.1 Adults**

246 The diagnosis of ADHD in adults should be similar to that in children, and exerted by trained  
247 psychiatrists or comparable health care professionals. Mandatory for the diagnosis in adults is the  
248 verifiable presence of first symptoms in early childhood. Borderline- and antisocial personality  
249 disorder are often found co-morbid<sup>14,15</sup>. The presence of other axis I diagnoses (e.g. Major  
250 Depression) should be excluded as well as substance abuse and alcoholism. Depressive and anxiety  
251 *symptoms* should be assessed with proper scales for adults.

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<sup>14</sup> Kooij JJS, Boonstra AM et al. 2006. Coexistence of borderline and antisocial personality disorder, and role of childhood sexual abuse in adults with ADHD. Thesis

<sup>15</sup> Miller TW, Nigg JT et al. 2007. Axis I and II comorbidity in adults with ADHD. J Abnorm Psychol 116 (3): 519-28



252 As in children, dose finding and exploratory studies should preferably be performed in patients  
253 without co-morbidity. In confirmatory trial, a more easy position can be taken, i.e. allowing the pre-  
254 dominant co-morbidities to enable generalization of result to target population. Efficacy trials should  
255 be performed separately in this patient group, and not be extrapolated from data in children and  
256 adolescents. A similar trial design as in children/adolescents can be used. Symptoms may, however,  
257 present differently, and should be assessed with scales validated for adults. Clinician ratings should be  
258 primary, whereas ratings by a significant other and/or subject ratings, i.e. self report, can be made  
259 secondary.

### 260 **6.3.2 Pre-school children**

261 The diagnosis of ADHD in the very young children < 6 years of age may be similar as in the young  
262 school aged children. However, diagnostic instruments should be validated for this age group, as well  
263 as assessment scales.

264 Alternative strategies for dose finding may be necessary in this young age group. In small children,  
265 often higher doses are required. Therefore, mere extrapolation of pharmacokinetic data from older  
266 children may not be sufficient, and dependent on the nature of the product.

267 Special care should be taken for safety assessment. A prospective Cohort design for long-term safety  
268 follow-up should be part of the Risk Management Plan.

## 269 **7. CLINICAL SAFETY EVALUATION**

### 270 **7.1 General Recommendation**

271 Identified adverse events should be carefully monitored and should be characterised in relation to the  
272 duration of treatment, dose and/or plasma levels, recovery time, age and other relevant variables.

273 All adverse events should be fully documented with a separate analysis of adverse drug reactions,  
274 dropouts and patients who died during the trial.

275 Side effects that are characteristic of the class of the product being investigated should be carefully  
276 monitored. In this respect, both parents/caretakers or significant others and children should contribute  
277 to reports.

278 Clinical observations should be supplemented if necessary by appropriate tests (blood pressure,  
279 cardiac rhythm etc.).

280 Beyond the regular assessment of adverse events special attention should be paid towards effects,  
281 short- and long-term, on the developing brain and bodily functions.

### 282 **7.2 Specific Adverse Events**

#### 283 **7.2.1 Rebound/Withdrawal/Dependence**

284 When pharmacological treatment is stopped, rebound and/or withdrawal phenomena may occur.  
285 Therefore, rebound and/or withdrawal phenomena should be systematically investigated.

286 For new candidate compounds, at least one short-term and one long-term trial should incorporate a  
287 short withdrawal period to look for withdrawal symptoms. This could be done in a randomised  
288 withdrawal study where treatment is abruptly stopped in responders and patients are followed for a  
289 suitable time to detect possible rebound and withdrawal symptoms.

290 Animal studies will be needed to investigate the possibility of dependence in new classes of  
291 compounds or when there is an indication that dependence may occur. Differentiation between pre-  
292 and post pubertal status and adulthood is needed, because of ongoing brain development across the  
293 age span of 6-18 years, and the matured brain in adulthood. Based on the results of the animal studies,  
294 in vivo studies in humans may be required.

#### 295 **7.2.2 Central Nervous System (CNS) Adverse Reactions**

296 Depending on the class of the investigated medicinal product and the possible interactions with  
297 various receptors, effects on cognition, reaction time and /or driving, and the extent of sedation should

298 be studied. Neurocognitive measures in the different age cohorts (children/adolescents/adults) should  
299 be considered as standard for the (long-term) safety assessment. Similarly it may be necessary to  
300 monitor psychiatric side effects (e.g. depression, mania, and mood).

301 Suicidal ideation and behaviour should be monitored carefully. Special attention should be paid to  
302 attempted and completed suicides. The Columbia Suicide Severity Rating Scale by Posner et al<sup>16</sup> is  
303 currently used in many studies, but alternative scales may be used as well.

### 304 **7.2.3 Haematological Adverse Reactions**

305 Special attention should be paid to agranulocytosis, aplastic anaemia and reduction in platelet count, if  
306 relevant for the drug under investigation.

### 307 **7.2.4 Cardiovascular Adverse Reactions**

308 Special attention should be paid to cardiotoxicity, i.e. hypertension, arrhythmias and conduction  
309 disorders, in particular QT interval prolongation, if the medicinal product belongs to a class associated  
310 with cardiovascular effects. Cardiac safety in cardiovascular compromised patients (e.g. congenital  
311 abnormalities) should be monitored. Likewise special attention should be given to cardiotoxicity in the  
312 compromised adult population.

### 313 **7.2.5 Endocrinological Adverse Reactions**

314 Special attention should be paid to growth, alterations in weight, and sexual maturation. In adolescents  
315 and adults, disturbance in libido should be assessed.

316 Depending on the pharmacological properties of the new therapeutic agent, the investigation of  
317 endocrinological parameters may be necessary (prolactine secretion, adrenal hormones etc).

## 318 **7.3 Extent of Population Exposure to Assess Clinical Safety Including Long-term Safety**

319 The total clinical experience should generally include data on a large and representative group of  
320 patients in line with the guideline on population exposure (ICH E1A).

321 Long-term safety trials are mandatory in ADHD as childhood onset disorder. Special attention should  
322 be drawn towards the effects on the developing brain and body, and the susceptibility to the 'known'  
323 side effects of psychotropic drugs in children, that may be altered or enhanced. Often, enhanced or  
324 altered sensitivity is reported in children and adolescents compared to adults.<sup>17</sup> Advantage can be  
325 gained from long-term safety data in young animals<sup>18</sup>. Long-term safety can be assessed in open  
326 extension studies after the double blind. Studies should last for at least 1 year, and prospective follow-  
327 up for a longer period of time should be part of the Risk Management Plan (RMP) post-licensing. A  
328 prospective cohort design is recommended (see safety section).

329 Long-term safety trials in adults may not need follow-up in the RMP, unless safety signals emerge  
330 from the phase III trials. The assessment of dependence and abuse potential after prolonged exposure  
331 is mandatory, and interaction with other psychotropic drugs needs to be investigated

332 Long-term safety assessment for the different age cohorts, should be part of the Risk Management  
333 Plan.

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<sup>16</sup> Posner K, Oquendo MA et al. 2007. Columbia Classification Algorithm of Suicide Assessment (C-CASA): classification of suicidal events in de FDA's pediatric suicidal risk analysis of antidepressants. *Am J Psychiatry* 164 (7): 1035-43.

<sup>17</sup> Correll CU. 2008. Monitoring and management of antipsychotic related metabolic and endocrine adverse events in paediatric patients. *Int Rev Psychiatry* 20 (2): 195-201.

<sup>18</sup> Advokat C. 2007. Update on amphetamine neurotoxicity and its relevance to the treatment of ADHD. *J Atten Disorder* 11 (1): 8-16.