

# Severe cutaneous adverse reactions (SCAR)

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A consensus by a CIOMS Working Group

Council for International Organizations  
of Medical Sciences (CIOMS)



Geneva 2025



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**ISBN: 978-929036107-7**

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**Suggested citation:** Severe Cutaneous Adverse Reactions (SCAR). A consensus by a CIOMS Working Group. Geneva, Switzerland: Council for International Organizations of Medical Sciences (CIOMS), 2025.

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Design: Agence Gardeners, Annecy (France).

# ACKNOWLEDGEMENTS

CIOMS gratefully acknowledges the generous support from drug regulatory authorities, industry and other organizations and institutions which, by making available their experts and resources, facilitated the work that resulted in this publication.

We are also indebted to the international group of scientists who were members of the CIOMS Severe Cutaneous Adverse Reactions (SCAR) Working Group, for their contributions to this consensus report. Members participated actively in the discussions as well as in drafting and re-drafting the different sections of the report, enabling the Working Group to bring this major project to a successful conclusion. Special thanks go to Prof Hervé Le Louët, President of CIOMS, who had the initial idea for this Working Group and played a leading role in making it come about.

The meetings of the Working Group were led by co-chairs Dr Melissa Reyes and Dr Chia-Yu Chu. Their hard work and unwavering commitment were exceptional throughout this project. The Editorial Team, comprising Drs Melissa Reyes, Chia-Yu Chu, Alexandre Kiazand, Siew Eng Choon, Lee Haur Yueh, Sylvia Lesperance and Lembit Rägo merits a very special mention and thanks.

CIOMS is extremely grateful to chapter leads, David Brott, Neil Shear, Siew Eng Choon, Roni Dodiuk-Gad, Haur-Yueh Lee, Melissa Reyes, Alexandre Kiazand, Violeta Regnier-Galvao, Priya Bahri and Ariel Porcalla who facilitated the work of sub-groups, which led to the first versions of the different chapters and appendices of this report.

We also wish to thank experts at U.S. FDA, namely Michael A. Pacanowski, Youssef Roman and Tien M. Truong for their invaluable help on [Chapter 4](#).

Our thanks and appreciation go to Drs Chia-Yu Chu and Siew Eng Choon as well for providing illustrative figures of different forms of SCAR.

At CIOMS, Catherine Bates for her editing and coordination work, and Dr Lembit Rägo and Sue le Roux for managing the project.

Finally, we wish to acknowledge the commenters for their remarks during the public consultation. This input greatly enhanced the quality of the draft.

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# ABBREVIATIONS AND ACRONYMS

|              |   |
|--------------|---|
| ACLE         | Acute Cutaneous Lupus Erythematosus   |
| ADR          | Adverse Drug Reaction   |
| AE           | Adverse Event   |
| AGEP         | Acute Generalized Exanthematous Pustulosis                                      |
| AGPP         | Acute Generalized Pustular Psoriasis  |
| aGVHR        | Acute Graft Versus Host Reaction  |
| ARDS         | Acute Respiratory Distress Syndrome   |
| ART          | Antiretroviral Therapy  |
| AUS-SCAR     | Australian Registry of Severe Cutaneous Adverse Reactions                       |
| BSA          | Body Surface Area   |
| cADR         | Cutaneous Adverse Drug Reaction   |
| CBC          | Complete Blood Count  |
| <u>CHMP</u>  | Committee for Medicinal Products for Human Use of the European Medicines Agency |
| CI           | Confidence Interval   |
| CKD          | Chronic Kidney Disease  |
| <u>CIOMS</u> | Council for International Organizations of Medical Science                      |
| CMV          | Cytomegalovirus   |
| CRP          | C-reactive Protein  |
| CPNDS        | Canadian Pharmacogenomics Network for Drug Safety                               |
| CTCAE        | Common Terminology Criteria for Adverse Events                                  |
| CYP          | Cytochrome P450   |
| CYP2C9       | Cytochrome P450 2C9   |
| DHCP         | Dear Healthcare Provider  |
| DHPC         | Direct Healthcare Professional Communication                                    |
| DI SCLE      | Drug-Induced Subacute Cutaneous Lupus Erythematosus                             |
| DIHS         | Drug-Induced Hypersensitivity Syndrome  |
| DPT          | Drug Patch Testing  |
| DRESS        | Drug Reaction with Eosinophilia and Systemic Symptoms                           |
| EBV          | Epstein-Barr Virus  |
| ECG          | Electrocardiogram   |
| EHR          | Electronic Health Record  |
| ELISpot      | Enzyme Linked Immunosorbent Spot  |

|               |   |
|---------------|---|
| <u>EMA</u>    | European Medicines Agency   |
| EMM           | Erythema multiforme Major   |
| EN            | Epidermal or Epithelial Necrolysis  |
| EU            | European Union  |
| ExDerm        | Exfoliative Dermatitis  |
| <u>FDA</u>    | U.S. Food and Drug Administration   |
| FDE           | Fixed Drug Eruptions  |
| GBFDE         | Generalized Bullous Fixed Drug Eruptions  |
| G-CSF         | Granulocyte Colony Stimulating Factor   |
| GM-CSF        | Granulocyte/Macrophage Colony-Stimulating Factor  |
| GPP           | Generalized Pustular Psoriasis  |
| GWAS          | Genome-Wide Association Study   |
| H&E           | Hematoxylin and Eosin   |
| HCP           | Healthcare Professional   |
| HHV           | Human Herpes Virus  |
| HHV6          | Human Herpes Virus 6  |
| HIV           | Human Immunodeficiency Virus  |
| HLA           | Human Leukocyte Antigen   |
| ICD-CM        | International Classification of Diseases - Clinical Modification                                    |
| <u>ICH</u>    | International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use |
| ICSR          | Individual Case Safety Report   |
| ICU           | Intensive Care Unit   |
| IQR           | Interquartile Range   |
| IRIS          | Immune Reconstitution Inflammatory Syndrome   |
| IRTEN         | International Registry for Toxic Epidermal Necrolysis   |
| ITCH          | International Consortium on Drug Hypersensitivity   |
| IVIG          | Intravenous Immunoglobulin  |
| JAK           | Janus Kinase  |
| LE            | Lupus Erythematosus   |
| <u>MedDRA</u> | Medical Dictionary for Regulatory Activities  |
| MHC           | Major Histocompatibility Complex  |
| MPE           | Maculopapular Exanthem  |
| NPV           | Negative Predictive Value   |
| NSAID         | Non-Steroidal Anti-Inflammatory Drugs   |
| OR            | Odds Ratio  |

|                |  |
|----------------|--|
| PE             | Paraneoplastic Erythroderma                          |
| PGx            | Pharmacogenomic                                      |
| PPV            | Positive Predictive Value                            |
| PT             | Preferred Term                                       |
| PV             | Pharmacovigilance                                    |
| PUVA           | Psoralen Combined with Ultraviolet A                 |
| REMS           | Risk Evaluation and Mitigation Strategies            |
| RMP            | Risk Management Plan                                 |
| SARS-CoV-2     | Severe Acute Respiratory Syndrome Coronavirus 2      |
| SCAR           | Severe Cutaneous Adverse Reaction(s)                 |
| SDH            | Society of Dermatology Hospitalists                  |
| SCLE           | Subacute Cutaneous Lupus Erythematosus               |
| SLE            | Systemic Lupus Erythematosus                         |
| SmPC           | Summary of Product Characteristics                   |
| SJS            | Stevens-Johnson Syndrome                             |
| SOC            | System Organ Class                                   |
| SSSS           | Staphylococcal Scalded Skin Syndrome                 |
| SUSAR          | Suspected unexpected serious adverse reaction        |
| TARC           | Thymus and Activation-Regulated Chemokine            |
| TB             | Tuberculosis   |
| TBSA           | Total Body Surface Area                              |
| TEN            | Toxic Epidermal Necrolysis                           |
| TEN Like LE    | TEN-Like Lupus Erythematosus or Lupus-Associated TEN |
| TNF            | Tumour Necrosis Factor                               |
| UK             | United Kingdom                                       |
| U.S.           | United States  |
| <u>WHO</u>     | World Health Organization                            |
| <u>WHO-UMC</u> | WHO Uppsala Monitoring Centre                        |



# FOREWORD

Severe Cutaneous Adverse Reactions (SCAR) such as Stevens-Johnson syndrome/toxic epidermal necrolysis (SJS/TEN) are associated with significant patient morbidity and mortality. These reactions may result in death or life-threatening conditions, inpatient hospitalization or prolongation of existing hospitalization, or significant disability/incapacity.

The SCAR Working Group of the Council for International Organizations of Medical Sciences (CIOMS) consists of a diverse and comprehensive group of major stakeholders, i.e. academia/research organizations, clinicians, medicinal product<sup>1</sup> developers/industry and regulatory authorities, to assist in establishing a balanced, global perspective on the approach for SCAR detection, susceptibility factors, severity, outcome and probability through causality assessment tools, monitoring and risk management during the medicinal product development and post-authorization phases.

The Working Group featured broad participation, with experts from several World Health Organization regions, to ensure comprehensiveness, synergies and global impact.

To increase input, the draft document was posted for public consultation prior to finalization. This report takes into account the feedback received from external commenters and leading institutions globally, as a result of the public consultation.

## CIOMS SCAR Working Group Objectives

The intent is to provide guidance for medicinal product developers, regulatory authorities, healthcare professionals and scientists in academic and research organizations regarding:

- ▶ Diagnosis of SCAR in patients;
- ▶ Interpretation and management of SCAR safety signals for a medicinal product considering that SCAR assessments differ between clinical practice, clinical trials and observational studies, and that there is a need to enhance safety of medicinal product development and in lifecycle management;
- ▶ SCAR data analysis of suspected unexpected serious adverse reactions during clinical trials, individual case safety reports in the post-authorization phase, aggregate data from clinical trials and observational studies using this consensus report on the terminology and level of evidence needed to assess safety, data standards, and data acquisition;
- ▶ Data capture and analysis of safety signals of a SCAR for a medicinal product during pre-authorization clinical trials by adopting standards for data and biospecimen acquisition and management, to allow future biomarkers development and validation, albeit acknowledging that risks of SCAR, as usually rare adverse reactions, may not be detectable in clinical trials, given their typical study size;
- ▶ Proposed causality assessment process in clinical trials and the post-authorization phase, including assessment of SCAR data for strength of evidence or degrees of uncertainty in causal association;
- ▶ Assessment of SCAR safety data for special populations with impaired immune status, patients with cancer, patients with autoimmune diseases, older adults, paediatric patients and pregnant women;

<sup>1</sup> CIOMS Cumulative Glossary with a Focus on Pharmacovigilance - 75<sup>th</sup> Anniversary Edition defines “medicinal product” according to the definition below. In this SCAR report, “Medicinal product” will be used interchangeably with the term “drug”.

Any substance or combination of substances:

- presented as having properties for treating or preventing disease in humans; or
- which may be used in or administered to humans either with a view to restoring, correcting or modifying physiological functions by exerting a pharmacological, immunological or metabolic action, or to making a medical diagnosis.

Note: In other jurisdictions, this may be called a medicine, medical product or a drug, and may include biologicals and vaccines.

- ▶ Validation of established and new biomarkers, also through combining large SCAR safety datasets across many clinical trials and post-authorization data in different patient populations to generate sufficient data for detecting rare SCAR induced by a medicinal product;
- ▶ Prevention and mitigation of SCAR induced by medicinal products.

The aim of this report is to create a global consensus reference for medicinal product developers, regulatory authorities, healthcare professionals and scientists in academic and research organizations, who are involved in product life cycle management or clinical practice.

# EXECUTIVE SUMMARY

The intent of this report is to provide guidance on SCAR for medicinal product developers, regulatory authorities, healthcare professionals and scientists in academic and research organizations. Following is a brief description of each chapter:

## Chapter 1: What are Severe Cutaneous Adverse Reactions?

This chapter describes the differences between cutaneous adverse drug reactions (cADRs) and severe cutaneous adverse reactions (SCAR) in terms of epidemiology, etiology, clinical characteristics, prognosis and outcome of the various SCAR conditions.

## Chapter 2: Diagnosis and identification of SCAR cases

The first step in analysing a putative SCAR is to make a tentative diagnosis. In some instances, however, the diagnostic criteria for Drug Reaction with Eosinophilia and Systemic Symptoms (DRESS), Acute Generalized Exanthematous Pustulosis (AGEP) and other SCAR overlap and hence, these conditions can be difficult to diagnose in their early stages. A SCAR diagnosis should consider patient history, visual assessment (appearance, morphology), severity and the presence of systemic symptoms, followed by a clinical investigation of potential causes or causality assessment in the individual patient, including medical comorbidities and concomitant medications.

## Chapter 3: Case management in clinical care

Withdrawal of the culprit<sup>1</sup> medicinal product is the cornerstone of care for SCAR. Additionally, management and supportive care are elucidated in this chapter.

## Chapter 4: Biomarkers for SCAR

Numerous investigations have uncovered many promising biomarkers to identify individuals at risk of developing SCAR, confirm and diagnosis of SCAR early, and inform prognosis. Human leukocyte antigen (HLA) variants are consistently associated with the risk for SCAR and testing results are clinically actionable for many culprit medicinal products, most significantly for anti-epileptics and allopurinol. Several histopathologic, blister fluid and serum biomarkers have been identified that appear to be specific to SCAR and could enable earlier diagnosis. Some may even represent possible therapeutic targets. However, more research is needed to confirm their utility in the diagnostic workup of SCAR.

## Chapter 5: Causality assessment of SCAR in pre- and post-authorization surveillance

Causality assessments aim to determine the procedure to determine the relationship between the medicinal product and the adverse event (AE). Methods such as Bradford Hill criteria, Global Introspection, operational algorithms and probabilistic approaches are presented for SCAR. Also presented are adjudication, targeted follow-up form, and assessment of aggregate data.

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<sup>1</sup> Culprit medications are medicinal products deemed to have caused an ADR.

## **Chapter 6: Pre-authorization safety data collection and analysis**

Prompt recognition of SCAR enhances safety of clinical trial participants and enables the assessment of the impact of SCAR on the clinical trial programme. Risk factors such as patient characteristics, pharmacologic mechanisms and pharmacogenomic attributes should all be considered when setting up pre-authorization surveillance.

## **Chapter 7: Post-authorization safety data collection and assessment**

Data sources for post-authorization surveillance include spontaneous reports of suspected adverse reactions, electronic health records (EHRs), registries, clinical trial data and preclinical data.

## **Chapter 8: Risk minimization**

Once a SCAR induced by medicinal products is detected, the most appropriate immediate interventions in managing it, are prompt evaluation of the patient and discontinuation of the suspect products. Such interventions, however, must be based on the benefit-risk balance of the treatment for the given patient. Key developments in SCAR research include new technologies allowing the identification of genetic risk factors with improved sensitivity, specificity and efficiency. Routine risk minimization measures and additional risk minimization measures for SCAR are presented with examples.

# INTRODUCTION

An adverse event (AE) is any untoward medical occurrence that may present during treatment with a medicinal product (drug or biological product), but which does not necessarily have a causal relationship with this treatment. An AE therefore can be any unfavourable and unintended sign (for example, an abnormal laboratory finding) symptom or disease that is temporally associated with the use of a medicinal product, whether or not it is related to this medicinal product.

An adverse drug reaction (ADR), as established by regional regulations, guidance, and practices, concern noxious and unintended responses to a medicinal product. The phrase “responses to a medicinal product” means that a causal relationship between a medicinal product and an AE is at least a reasonable possibility.[1]

Skin is the most commonly-affected organ by ADRs not only by small molecules in medicinal products, including vaccines. Cutaneous ADRs (cADRs) affect 2% to 3% of all hospitalized patients.[2] cADRs have a wide spectrum of clinical manifestations, are caused by various medicinal products, and result from different pathophysiologic mechanisms. Hence, their diagnosis and management are challenging, but approximately 0.1% to 1% of patients with medicinal product eruptions have serious ADRs.[3] In regulatory guidelines, a serious AE or adverse reaction to a medicinal product is defined as any untoward medical occurrence that at any dose satisfies any of the following criteria:[1,4]

- ▶ results in death;
- ▶ is life-threatening;
- ▶ requires inpatient hospitalization or prolongation of existing hospitalization;
- ▶ results in persistent or significant disability/incapacity;
- ▶ is a congenital anomaly/birth defect; or
- ▶ other medically important event or reaction.[5]

Severe cutaneous adverse reactions (SCAR) are rare, idiosyncratic disorders that are most often induced by medicinal products but may also be reactions to other kinds of exposure, and are associated with significant morbidity, usually leading to hospitalization. SCAR include Stevens-Johnson syndrome/toxic epidermal necrolysis (SJS/TEN), drug reaction with eosinophilia and systemic symptoms (DRESS), acute generalized exanthematous pustulosis (AGEP), and generalized bullous fixed drug eruptions (GBFDE). The incidence of SJS/TEN is estimated at 1-13 per million person-years with DRESS occurring at 21.8 cases per million persons[6] and AGEP occurring at 1-5 cases per million persons per year.[7,8,9,10] Consequently, even a signal well-documented spontaneous case report from a healthcare professional (HCP) or patient may generate a safety signal for SCAR that warrants further evaluation.[11] This may indicate possible causality with the medicinal product, particularly for serious SCAR that are rare in the general population or SCAR that are rare in the absence of medicinal product exposure.[1,5]

## Future needs

Medicine-induced SCAR are rare serious AEs that pose substantial hurdles to medicine developers, regulators, healthcare professionals and patients as well as patient acceptance of therapeutic options and adherence. Further work is necessary to continue the advancement of science, medicine and regulation to better identify, characterize and mitigate SCAR risks.

The following highlight some of the main topics that need further progress:

### For healthcare professionals:

- ▶ The lack of consensus in clinical guidance regarding SCAR in special populations, especially patients with impaired immune status, patients with cancer, patients with pre-existing autoimmune diseases, older adults, paediatric patients and pregnant women;
- ▶ There is mounting concern about the ongoing health burden of SCAR and the emergence of SCAR related to novel biological medicinal products, as well as the burden of cost related to diagnosis and management.<sup>[12,13,14]</sup>

### For regulatory authorities and the biopharmaceutical industry:

- ▶ The need for comprehensive, proactive and systematic workflows for safety data capture and analysis during medicinal product development;
- ▶ The lack of harmonized and validated case definitions of SCAR types, the need to ensure completeness of safety assessment and management in medicines development, as well as consensus guidance on the design of studies to develop and validate new technologies and biomarkers;
- ▶ The need for evidence-based guidelines to promote consistent pharmacovigilance and risk management of SCAR in clinical trials and post-authorization studies during medicinal product development and post-authorization phases;
- ▶ The lack of robust data to support inclusion of more drug-specific information provided in prescribing information and labelling (e.g. Summary of Product Characteristics (SmPC), United States Prescribing Information (USPI)) about SCAR.

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# CHAPTER 1.

## WHAT ARE SEVERE CUTANEOUS ADVERSE REACTIONS?

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### Chapter summary

- ▶ Severe cutaneous adverse reactions (SCAR) comprise Stevens-Johnson syndrome (SJS), toxic epidermal necrolysis (TEN), drug reaction with eosinophilia and systemic symptoms (DRESS), acute generalized exanthematous pustulosis (AGEP) and generalized bullous fixed drug eruptions (GBFDE).
- ▶ Clinical phenotypes of cutaneous adverse drug reactions (cADRs) are very diverse and most of them are non-life-threatening reactions such as maculopapular exanthema (MPE), urticaria, fixed drug eruptions (FDE), lichenoid eruptions, vasculitis and others. Maculopapular exanthem (MPE) is the most common cADR to medicinal products.
- ▶ SJS, SJS/TEN-overlap and TEN represent different severity spectra of the same disease, epidermal necrolysis (EN), which needs to be distinguished from erythema multiforme major (EMM) which is mainly due to infections.
- ▶ DRESS is a multi-systemic ADR with a heterogeneous presentation and variable clinical course. Initial symptoms may be prodromal in nature such as fever and malaise. Cutaneous eruptions are extensive and may be polymorphic in presentation, including maculopapular eruptions, infiltrated plaques, pustules, target-like lesions, purpura, eczematous lesions and erythroderma. Facial erythema and swelling are prominent features of DRESS. Various internal organs may be involved including the liver, kidneys, lungs, heart, nervous system and others.
- ▶ AGEP is characterized by a sudden onset of numerous pinpoint, non-follicular sterile pustules on oedematous erythematous skin. The most characteristic feature of AGEP is its clinical course. It has a very rapid onset and equally rapid resolution.
- ▶ GBFDE is characterized by well-demarcated, round, or oval erythematous, violaceous or dusky red patches with blisters and erosions. Most patients report a history of similar eruptions. GBFDE may be confused as SJS/TEN due to the extensive bullous eruption with erosions.

### Conclusions or recommendations

- ▶ It is important to distinguish SCAR from non-SCAR in terms of epidemiology, etiology, clinical characteristics, prognosis and outcomes.

## 1.1. Introduction

An ADR, as defined by the World Health Organization (WHO), is “one that is noxious, unintended and occurs at doses normally used in man.”<sup>[1]</sup> Cutaneous adverse drug reactions (cADRs) are common, comprising 10 to 30% of all reported ADRs.<sup>[2,3]</sup> Among hospitalized patients, the incidence of cADRs has been estimated to be 2 to 3%.<sup>[4]</sup> Cutaneous manifestations of ADRs range from benign maculopapular eruption to life-threatening toxic epidermal necrolysis and from those localized only to skin to those associated with systemic disease.

Three prospective studies which investigated the epidemiology of dermatologist-diagnosed cADRs in a hospital setting documented prevalence rates of 3.6 to 7 per 1000 hospitalized patients. The first study from France detected 48 cADRs among 13 294 hospitalizations over six months,

yielding a prevalence of 3.6 per 1000 hospitalized patients.<sup>[5]</sup> Reactions were considered serious in 34% of cases because they were responsible for hospitalization (18%), increased the duration of hospitalization (14%) or were life threatening (2%). The second study from Mexico documented a cADR prevalence of 7 per 1000 inpatients (35/4765 hospital discharges over 10 months) and 17% were severe.<sup>[6]</sup> The third study from Malaysia identified 43 cADRs among 11017 hospitalized patients over a six month period, yielding a prevalence of 3.9/1000 admissions and 51.2% were SCAR.<sup>[7]</sup>

SCAR comprise Stevens-Johnson syndrome (SJS), toxic epidermal necrolysis (TEN), drug reaction with eosinophilia and systemic symptoms (DRESS), acute generalized exanthematous pustulosis (AGEP) and generalized bullous fixed drug eruptions (GBFDE).<sup>[8,9]</sup> Medicinal products are responsible for > 85% of SJS/TEN in adults, and for most cases of DRESS, AGEP and GBFDE.<sup>[8,9]</sup> T-cell-mediated delayed hypersensitivity reactions, triggered by interactions between small-molecule drugs, HLA class I molecules and T-cell receptors, underlie the pathogenesis of most SCAR.

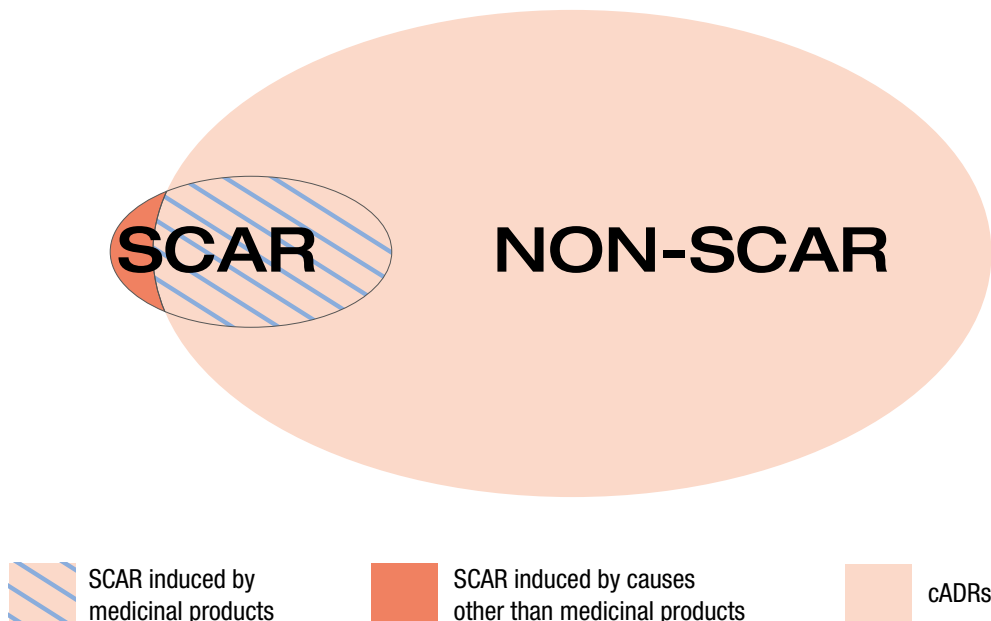
## 1.2. Cutaneous ADRs

The majority of cADRs are non-serious and not life-threatening. A serious AE or reaction to a medicinal product is defined as any untoward medical occurrence that at any dose satisfies any of the following criteria:<sup>[10,11]</sup>

- ▶ results in death,
- ▶ is life-threatening,
- ▶ requires inpatient hospitalization or prolongation of existing hospitalization,
- ▶ results in persistent or significant disability/incapacity,
- ▶ is a congenital anomaly/birth defect, or
- ▶ other medically important event or reaction.<sup>[12]</sup>

SCAR are a heterogeneous group of delayed T-cell-mediated hypersensitivity reactions, which are most frequently triggered by medicinal products.<sup>[8]</sup> They are life-threatening and therefore, serious reactions with a reported case fatality between < 5% for SJS and 30% for TEN.<sup>[13]</sup> However, SCAR are not exclusively caused by medications and can be induced by various non-medicinal product causes including infections.<sup>[8,9,12,14,15]</sup>

Figure 1. SCAR and cADRs

**Note:**

SCAR = 0.1-1% of all non-SCAR

SCAR induced by causes other than medicinal products = 5-10% of all SCAR

For instance, SJS and TEN which represent different severity spectra of the same disease are not caused by medicinal products in about 15-33% of cases, while most other SCAR such as DRESS, AGEP and GBFDE are caused by medicinal products.<sup>[9,14,15]</sup> For effective pharmacovigilance and benefit–risk management of medications, accurate estimates of the incidence of SCAR are important to characterize and quantify SCAR risk with a specific medicinal product.<sup>[8,11]</sup>

### 1.3. Non-SCAR

Clinical phenotypes of cADRs are very diverse and most of them are non-life-threatening reactions (non-SCAR) such as maculopapular exanthem (MPE), urticaria, FDE, lichenoid eruptions, vasculitis and others. A summary of differences between SCAR and non-SCAR is provided in [Table 1](#) below. MPE is the most common cADR to medicinal products.<sup>[7,9,12,13]</sup> MPE is characterized by a maculopapular/morbilliform eruption which usually appears one to two weeks after medicinal product exposure but may occur up to one week after stopping it. On re-exposure to the causative or related medicinal product, onset of MPE is much shorter, within one to three days after re-exposure. Medicinal products commonly implicated are penicillin, sulfonamides, cephalosporins and anti-epileptics. MPE resolves within one to two weeks on medicinal product withdrawal. It is a generally benign reaction but may be a first sign of DRESS. Factors favouring DRESS are fever, extensive skin involvement affecting more than 50% body surface area (BSA), facial swelling and a delayed onset of two to six weeks. (Figure 2)

## Figure 2. Characteristic morbilliform eruption in a patient with dapsone-induced reaction

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Morbilliform rashes are a common manifestation of viral infections but unlike medicinal product eruptions which usually first appear on the trunk and then spread to the limbs and neck, a viral exanthem usually starts on the face and exhibits a cephalic-caudal spread. MPE is also a well-known eruption seen in patients with infectious mononucleosis after exposure to aminopenicillins.

Another notable non-life-threatening cADR is a FDE which characteristically recurs on the same site or sites each time a culprit medicinal product is consumed.<sup>[16,17,18]</sup> Skin lesions are well-demarcated, round, or oval erythematous or violaceous patches which may be surmounted by bullae. FDE typically settled with hyperpigmentation on medicinal product withdrawal. If the patient is re-exposed to causative or related medicinal product, the same pigmented patch becomes red and swollen again and the patient may develop more lesions with repeated exposures. The lesions usually develop within 30 minutes to eight hours of taking the medicinal product.

Sites of predilection include hands and feet, lips, eyelids, and genitalia. Blisters and extensive ulceration may occur on mucosal sites (lips, vulva, penis). Medicinal products frequently implicated include non-steroidal anti-inflammatory drugs (NSAIDs), antibiotics (namely sulfamethoxazole, tetracyclines, dapsone), barbiturates and paracetamol/acetaminophen.

FDE may be solitary at first, but with repeated exposure to the culprit medicinal product, new lesions appear, and existing ones may increase in size leading to GBFDE. Hence, patients with FDE should be educated to avoid implicated and cross-reacting medicinal products to prevent potentially life-threatening GBFDE, which has a similar prognosis to SJS/TEN.<sup>[17]</sup>

Table 1. Comparison between SCAR and non-SCAR

|  | SCAR   | Non-SCAR   |
|--|--|--|
| Frequency  | <ul style="list-style-type: none"> <li>▶ SJS/TEN: 1–13 cases per million persons per year<sup>[6,7,9,12,17,19,20,21,22,23,24,25]</sup></li> <li>▶ DRESS: 21.8 cases per million persons<sup>[26]</sup></li> <li>▶ AGEP: 1-5 cases per million persons per year<sup>[19,27,28,29,30,31,32,33]</sup></li> </ul>    | <ul style="list-style-type: none"> <li>▶ 10-30% of all reported ADRs<sup>[2,3]</sup></li> <li>▶ 2-3% of all hospitalized patients<sup>[4]</sup></li> <li>▶ 0.36-0.7% (dermatologists diagnosed) of hospitalized patients in 3 prospective studies<sup>[5,6,7]</sup></li> </ul> |
| Common culprit medicinal products                                    | <ul style="list-style-type: none"> <li>▶ Allopurinol</li> <li>▶ Antibiotics</li> <li>▶ Antiepileptic agents</li> <li>▶ Nonsteroidal anti-inflammatory drugs (NSAIDs)</li> <li>▶ Sulfonamides</li> </ul>  | All medicinal products may cause non-SCAR cADRs  |
| Latency period from medicinal product exposure to onset of skin rash | <ul style="list-style-type: none"> <li>▶ Variable, but for SJS/TEN and DRESS, it is usually longer than for non-SCAR cADRs</li> <li>▶ SJS/TEN: 7-21 days</li> <li>▶ DRESS: 17-31 days</li> <li>▶ AGEP: 1-2 days</li> <li>▶ GBFDE: a few hours</li> </ul>   | <ul style="list-style-type: none"> <li>▶ 1-3 days for urticaria or FDEs</li> <li>▶ 1-2 weeks for MPE or other non-SCAR cADRs</li> </ul>  |
| General symptoms   | Fever, general malaise, and sore throat are common   | May have mild fever  |
| Skin manifestations  | <ul style="list-style-type: none"> <li>▶ Widespread lesions, rapid progression</li> <li>▶ Blisters</li> <li>▶ Targetoid lesions</li> <li>▶ Pustules</li> <li>▶ Facial swelling</li> <li>▶ Purpuric changes</li> <li>▶ Skin pain (especially in SJS/TEN and GBFDE)</li> <li>▶ Nikolsky sign in SJS/TEN</li> </ul> | Localized or widespread lesions; mainly macular or papular lesions; no blisters/pustules/skin pain/Nikolsky sign   |
| Mucosal involvement  | Often  | Very rare  |
| Hospitalization for intensive care                                   | Needed   | Usually not needed   |
| Laboratory data  | <ul style="list-style-type: none"> <li>▶ Variable, but relatively more common than non-SCAR</li> <li>▶ SJS/TEN and AGEP: leukocytosis</li> <li>▶ DRESS: leukocytosis, eosinophilia, atypical lymphocytosis, abnormal liver/renal function tests</li> </ul>   | Uncommon, except mild eosinophilia   |

|                            | SCAR   | Non-SCAR                                       |
|----------------------------|--|--|
| Visceral organ involvement | <ul style="list-style-type: none"> <li>▶ Variable, but relatively more common than non-SCAR</li> <li>▶ Very common in DRESS</li> </ul>   | Rare   |
| Outcome                    | <ul style="list-style-type: none"> <li>▶ Life threatening</li> <li>▶ SJS/TEN: case fatality 5-30%<sup>[17,23]</sup></li> <li>▶ DRESS: case fatality 2-10%<sup>[20,21]</sup></li> <li>▶ AGEP: case fatality &lt; 5%<sup>[28,34]</sup></li> <li>▶ GBFDE: case fatality ~10%<sup>[17,35]</sup></li> </ul> | Non-life threatening                           |
| Long-term sequelae         | <ul style="list-style-type: none"> <li>▶ SJS/TEN: may have ocular, mucosal, pulmonary and urogenital sequelae<sup>[36,42]</sup></li> <li>▶ DRESS: may have autoimmune diseases or end-organ failure in DRESS <sup>[36,61]</sup></li> </ul>   | Usually not associated with long-term sequelae |

## 1.4. Different types of SCAR

### 1.4.1. Stevens-Johnson syndrome/toxic epidermal necrolysis

#### 1.4.1.1. Epidemiology

Stevens-Johnson syndrome (SJS), toxic epidermal necrolysis (TEN) and SJS/TEN-overlap represent different severity spectra of the same disease, namely epidermal necrolysis (EN). SJS/TEN is distinct from erythema multiforme major (EMM), which is mainly the result of infections. In the past, EMM was assumed to be a less severe form of SJS because of similar clinical and histopathologic features, but it is not a SCAR. A number of studies have explored the incidence of drug-induced SJS/TEN. Hospital-based studies and studies using large electronic databases documented an annual incidence of 1–13 cases per million persons.<sup>[5,22,23,24,25,37,38,39]</sup> A prospective population-based study that used the German SCAR registry estimated the incidence of SJS/TEN in Germany to be one to two cases/million population/year.<sup>[19]</sup> A nation-wide population-based study that used a national health insurance database in South Korea from 2010 to 2013 reported 5.9 cases of SJS/TEN/million/year.<sup>[24]</sup>

A study conducted in the United Kingdom (UK) using Clinical Practice Research Datalink from 1995 to 2013 validated 551 cases, yielded an incidence of 5.76 SJS/TEN cases/million/year.<sup>[39]</sup> The twofold increased risk of SJS/TEN observed among Asians and Blacks in this study confirmed the finding of an earlier study from the United States (US), which was based on the Nationwide Inpatient Sample from 2009 to 2012 and documented an incidence of 12.7 cases of SJS /TEN/million adults/year with an increased risk in non-white populations (Asians; OR 3.27, 95% CI 3.02, 3.54 and Blacks; OR 2.01, 95% CI 1.92, 2.10).<sup>[37]</sup> SJS and TEN can occur at any age, but the median age among more than 2200 and 2635 EN incidents in Germany and France, respectively, was about 50 years old with a slight female preponderance.<sup>[18,22]</sup>

#### 1.4.1.2. Common etiology (medicinal products)

Although SJS and TEN are life-threatening SCAR, infections such as mycoplasma pneumonia and herpes simplex virus were also implicated as causes.<sup>[39]</sup> In about 15-30% of cases, no culprit medicinal product was identified. The EuroSCAR group identified allopurinol, anti-infectives, particularly sulfonamides, antiepileptic agents (namely carbamazepine, phenobarbital, phenytoin and lamotrigine), and NSAIDs of the oxicam type as high-risk drugs for induction of EN based on two case-controlled studies; first, conducted from 1989 to 1995, included 372 cases and 1720 controls and another between 1997 and 2001 of 379 validated cases and 1505 controls.<sup>[12,40]</sup> A study by the Asian SCAR consortium of 1028 validated cases of SJS/TEN treated from 1998 to 2017 showed that anti-epileptics were the most common culprit medicinal products followed by anti-infectives and allopurinol.<sup>[41]</sup> Oxcarbazepine, sulfasalazine, COX-II inhibitors, and strontium ranelate were identified as potentially new causes in Asia. In addition to sulfonamides and beta-lactam antibiotics, quinolones were also a common cause while several medications (e.g. oseltamivir, terbinafine, isotretinoin, and sorafenib) labelled as carrying a risk of SJS/TEN by FDA were not found to have caused any of the cases in the Asian countries investigated in this study.

#### 1.4.1.3. Clinical characteristics (that assist diagnosis by highlighting key clinical manifestations)

SJS/TEN are characterized by EN with varying degree of blistering, skin detachment and sloughing. By consensus, SJS, SJS/TEN overlap and TEN are defined as EN with skin detachment affecting < 10%, 10-30% and > 30% of the total body surface area (TBSA) respectively. Drug-induced SJS/TEN usually developed 4-28 days after initiation of culprit medicinal products. Cutaneous manifestation is often preceded by a prodromal period with symptoms such as fever, malaise, sore throat and cough.

Typical cutaneous lesions start as purpuric macules or atypical target lesions on the upper torso, proximal limbs and face before spreading to the rest of body including palms and soles. Skin pain is an important early symptom. Extensive necrolysis leads to sheets of denuded epidermis that exude serum, bleed easily and may become secondarily infected.(Figure 3)

#### Figure 3. Extensive skin detachment characteristic of TEN

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Mucosal involvement is universal, with two or more mucosal surfaces being involved in up to 80% of cases.<sup>[15]</sup> Oral involvement is most common, with haemorrhagic mucositis and ulceration occurring in 93-100% of cases.<sup>[42,43]</sup> Ocular involvement is seen in 60-100% of cases with severity ranging from conjunctival hyperaemia to complete epidermal sloughing of the ocular surface. Early ophthalmologist consultation is essential to prevent long-term ocular sequelae.<sup>[36,42]</sup> Genital involvement is seen in up to 71% of female patients. SJS/TEN may also involve other organs including pulmonary, hepatic, gastrointestinal, otorhinolaryngologic, genitourinary and renal systems.<sup>[5,15]</sup>

SJS/TEN may be distinguished from EMM, which is characterized by a typical round target lesion with a darker centre with or without a blister surrounded by a raised, lighter, pale pink ring and a bright red outermost ring, (Figure 4) whereas atypical target lesions in SJS are irregular in shape and flat.

**Figure 4. Typical round target lesions with a darker centre surrounded by a lighter, pale pink ring and a bright red outermost ring in a patient with EMM**

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Classic target lesions of EMM typically appear on the limbs and acral regions, whereas SJS/TEN lesions often begin on the torso before spreading more broadly. Additionally, EMM primarily affects younger patients and is closely linked with infections. In contrast, SJS/TEN is predominantly a SCAR that tends to affect older individuals. German registry data indicate that 65% of SJS patients were over 40 years old, whereas over 80% of EMM patients were younger than 40 years, with 45% being under 18 years old.

EMM is commonly associated with infections, particularly herpes simplex virus (HSV) and *Mycoplasma pneumoniae* infections, which often precede or coexist with the onset of EMM lesions. Systemic involvement in EMM is typically limited to the underlying infection and its complications, such as mucosal involvement in HSV infection. In contrast, SJS/TEN can involve multiple organ systems beyond the skin, leading to severe mucosal involvement, ocular complications, and potentially life-threatening systemic manifestations. Differential diagnosis between EMM and SJS/TEN requires careful consideration of clinical presentation, histopathological findings, and systemic involvement.<sup>[22,43]</sup> GBFDE is an important differential diagnosis of SJS/TEN. The classic, discrete, large and well-defined violaceous or brownish round or oval patches with or without a central blister are very

characteristic and can be readily distinguished from the confluent purpuric macules and patches of SJS and the large, denuded epidermis of TEN.

Patients with GBFDE typically do not present with fever or the characteristic haemorrhagic mucosal involvement seen in SJS/TEN. Instead, they often have a history of previous eruptions where healed hyperpigmented patches become inflamed upon re-exposure to triggering medications. Staphylococcal scalded skin syndrome (SSSS), another blistering and skin-detaching condition, differs in that it lacks target or haemorrhagic mucosal lesions and primarily affects children.

#### 1.4.1.4. Laboratory features

SJS/TEN is characterized by variable necrosis of keratinocytes, ranging from individual keratinocyte necrosis to full-thickness epidermal necrosis, often accompanied by sub-epidermal cleaving or bullae. There is typically a mild to moderate inflammatory infiltrate in the superficial perivascular to interstitial dermis, composed of lymphocytes and histiocytes, with variable numbers of neutrophils or eosinophils. Intra-epidermal bullae may occur in SJS/TEN but are more suggestive of SSSS, where epidermal detachment at the granular layer results in subcorneal bullae. SSSS is also characterized by a lack of dermal inflammatory cells.

Histologically, distinguishing EMM from SJS/TEN can be challenging as both may exhibit epidermal necrosis with a vacuolar to lichenoid interface change. As SJS/TEN progresses, epidermal necrosis tends to become more confluent, with inflammation less prominent compared to EMM. Clinical features of the disease are crucial considerations and should be correlated with biopsy findings to establish a final diagnosis.

#### 1.4.1.5. Prognosis and outcome (long-term sequelae)

SJS/TEN is a potentially life-threatening SCAR with an overall case fatality between 5% and 30%.<sup>[17,23]</sup> Potential prognostic markers associated with death include delayed transfer to a specialist unit, advancing age, increasing skin detachment, presence of septicemia and granulocytopenia. Survivors may have long-term physical sequelae such as cutaneous and ophthalmologic scarring, dyspigmentation, dental complications, genitourinary symptoms and pulmonary disease.<sup>[44,45]</sup> Long-term psychological outcomes include post-traumatic stress disorder anxiety, depression and decreased health-related quality.<sup>[44,45,46,47]</sup>

A recent survey conducted at 11 academic health centres in the U.S. between 1 January 2009, and 30 September 2019 which included 121 adult survivors of EN showed that the most common physical sequelae were cutaneous problems (84.3%), followed by ocular problems (59.5%) and oral mucosal problems (50.8%). Of screened participants, 53.3% of were positive for depression and 43.3% were positive for anxiety.<sup>[45]</sup>

### 1.4.2. Drug reaction with eosinophilia and systemic symptoms / Drug-induced hypersensitivity syndrome

#### 1.4.2.1. Epidemiology

Drug reaction with eosinophilia and systemic symptoms (DRESS), also known as drug-induced hypersensitivity syndrome (DIHS), is a rare and multi-systemic SCAR. DRESS/DIHS is characterized by a delayed onset (usually 2-6 weeks after initiation of the culprit drug) and presents with fever, rash, lymphadenopathy, and internal organ involvement such as hepatitis, nephritis, or pneumonitis. Eosinophilia and atypical lymphocytosis are common laboratory findings. DRESS/DIHS differs from other SCAR like SJS/TEN in its delayed onset, prolonged course, and prominent systemic involvement

beyond the skin. The epidemiology of DRESS is not well characterized. However, it is estimated to occur in up to 2 per 100,000 patients based on EHRs<sup>[26]</sup> and accounts for 10-20% of cADRs seen in a hospitalized setting.<sup>[48,49]</sup>

#### 1.4.2.2. Common etiology (medicinal products)

Aromatic antiepileptics (such as carbamazepine, phenytoin, lamotrigine, oxcarbazepine, phenobarbital) are the most common causal drugs, accounting for 35% of cases. Other highly associated medications include allopurinol, infective sulfonamides and other antibiotics such as vancomycin, minocycline and amoxicillin.<sup>[50]</sup> A prolonged latency between drug initiation and the onset of a reaction is characteristic of DRESS with a median latency estimated at 22 days (IQR 17-31 days).<sup>[49]</sup> However, shorter latency periods have been reported for cases due to iodinated contrasts and antibiotics.<sup>[51,52]</sup>

#### 1.4.2.3. Clinical characteristics (that assist diagnosis by highlighting key clinical manifestations)

DRESS is a multi-systemic ADR with a heterogeneous presentation and variable clinical course. Diagnostic criteria based on the Japanese (J-SCAR) and RegiSCAR criteria are shown in Tables 2 and 3 below. Initial symptoms may be prodromal in nature such as fever and malaise.

**Table 2. J-SCAR diagnostic criteria for drug-induced hypersensitivity syndrome<sup>[53]</sup>**

Permission obtained from Oxford University Press

|  |
|--|
| 1. Maculopapular rash developing > 3 weeks after starting with a number of drugs <sup>a</sup>  |
| 2. Prolonged clinical symptoms 2 weeks after discontinuation of the causative drug   |
| 3. Fever > 38° C   |
| 4. Liver abnormalities (alanine aminotransferase > 100U/L) <sup>b</sup>  |
| 5. Leukocyte abnormalities (at least one present)  |
| a. Leukocytosis (> 11x10 <sup>9</sup> /L)  |
| b. Atypical lymphocytosis (> 5%)   |
| c. Eosinophilia (> 1.5x10 <sup>9</sup> /L)   |
| 6. Lymphadenopathy   |
| 7. Human herpesvirus 6 reactivation  |
| <sup>a</sup> There are eight drugs to treat the majority of cases in Japan: carbamazepine, phenytoin, phenobarbital, zonisamide, mexiletine, dapsone, salazosulfapyridine and allopurinol. |
| <sup>b</sup> This can be replaced by other organ involvement, such as renal involvement.   |

A diagnosis is confirmed by the presence of all seven of the above criteria (typical DIHS) or five of the criteria (1 to 5, atypical DIHS).

**Table 3. RegiSCAR scoring system for DRESS diagnosis<sup>[54]</sup>**

Permission obtained from M. Mockenhaupt

| Assessment/ Score   | -1   | 0     | 1   | Comment  |
|---|------|-------|-----|--|
| <b>Fever <math>\geq 38.5^\circ\text{C}</math></b>   | No/U | Yes   |     | Acute episodes   |
| <b>Enlarged lymph nodes</b>   |      | No/U  | Yes | > 1 cm, $\geq 2$ different areas (right side plus left side is not adequate)   |
| <b>Eosinophilia</b><br>Eosinophils $\geq 700/\mu\text{L}$<br>or $\geq 10\%$ if leukocyte<br>< 4000/ $\mu\text{L}$   |      | No/U  | Yes | Score 2 for extreme eosinophilia<br>Eosinophils $\geq 1500/\mu\text{L}$ or $\geq 20\%$ if<br>leukocyte < 4000/ $\mu\text{L}$ |
| <b>Atypical lymphocytes</b>   |      | No/U  | Yes |  |
| <b>Skin rash</b>  |      |       |     | Onset < 21 days before hospitalization   |
| Extent > 50% body<br>surface area   |      | No/U  | Yes |  |
| Rash suggesting<br>DRESS  | No   | U     | Yes | $\geq 2$ symptoms: purpuric change,<br>facial edema, infiltration, psoriasiform<br>desquamation                              |
| Biopsy suggesting<br>DRESS  | No   | Yes/U |     | Score -1 if results fit any other specific<br>dermatopathologic diagnosis  |
| <b>Organ involvement</b>  |      |       |     | Excluding other causes, score max. of 2  |
| Liver: any criterion  |      | No/U  | Yes | ALT > 2*UNL, twice on successive dates<br>D-bil. > 2*UNL, twice on successive dates<br>AST, T-bil., ALP all > 2*UNL, once    |
| Kidney: any criterion   |      |       | Yes | Creatinine > 1.5* patient's baseline<br>Proteinuria above 1g/day   |
| Lung: any criterion   |      |       | Yes | Evidence of interstitial lung (CT, x-ray)<br>Abnormal bronchoalveolar lavage<br>Abnormal blood gases                         |
| Muscle/Heart: any<br>criterion  |      |       | Yes | Raised creatine kinase<br>Raised troponin T<br>Abnormalities in the echocardiogram   |
| Pancreas  |      |       | Yes | Amylase > 2* UNL   |
| Other organs  |      |       | Yes | Central nervous system, splenomegaly   |
| <b>Rash resolution<br/><math>\geq 15</math> days</b>  | No/U | Yes   |     |  |
| <b>Excluding other<br/>causes</b>   |      | No/U  | Yes | Score 1 if $\geq 3$ tests are performed and<br>negative  |
| Hepatitis A, B, C   |      |       |     | At least 2 tests are negative and 1 unknown:<br>negative   |
| Mycoplasma/Chlamydia  |      |       |     | At least 1 test is negative and 1 unknown:<br>negative   |
| Antinuclear antibody  |      |       |     |  |
| Blood culture   |      |       |     | Sampling within 3 days of hospitalization  |
| <b>Final Score</b>  |      |       |     |  |
| <b>Final scores:</b> < 2: excluded; 2-3: possible; 4-5: probable; > 5: definite   |      |       |     |  |
| <b>Abbreviations:</b> ALP, alkaline phosphatase; ALT, alanine transaminase; AST, aspartate transaminase; CT, computed tomography; D-bil., direct bilirubin; max., maximum; T-bil., total bilirubin; U, unknown; UNL: upper normal limit |      |       |     |  |

Cutaneous eruptions are extensive and may be polymorphic in presentation, encompassing maculopapular eruptions, infiltrated plaques, pustules, target-like lesions, purpura, eczematous lesions and in severe cases, erythroderma. Facial erythema and swelling are prominent features of DRESS. Unlike SJS/TEN, mucosal involvement is not a prominent feature. While histopathological examination may not always provide definitive diagnostic clues, it can sometimes show compatible but nonspecific findings such as perivascular lymphocytic infiltrates, dermal eosinophilia, or interface dermatitis. However, the diagnosis of DRESS/DIHS is primarily clinical, based on the characteristic constellation of symptoms and temporal relationship to drug exposure. Clinical judgment and consideration of systemic involvement remain crucial in the management of DRESS/DIHS.

Various internal organs may be involved including the liver, kidneys, lungs, heart, nervous system and others. In a prospective multinational registry, RegiSCAR, the most frequently involved organs are the liver (75%), kidneys (37%) and lungs (32%).<sup>[49]</sup> Although a cutaneous eruption is the most striking feature, the onset and clinical course of the internal organ may not parallel that of the skin.

**Liver involvement:** The patterns of liver injury in DRESS can be classified into cholestatic (37%), hepatocellular (19%) and mixed (27%). Up to 50% of cases may have severe involvement with liver enzymes being more than 10 times higher than the upper limit of normal.<sup>[55]</sup> Acute liver failure is uncommon and transplant is rarely required.

**Kidney involvement:** Renal involvement in DRESS occurs in up to 40% of patients and up to 8% of patients may develop acute renal failure.<sup>[56]</sup> Renal involvement occurs more commonly in cases associated with allopurinol and vancomycin.<sup>[49,52,57]</sup>

**Cardiac involvement:** Cardiac involvement occurs in up to 20% of cases and presenting features include tachycardia, dyspnoea, hypotension, chest pain and electrocardiogram (ECG) changes. Myocarditis can occur months after the culprit medicinal product has been discontinued and when the cutaneous and laboratory features have abated, leading to its under-diagnosis.

There are two forms of DRESS-associated myocarditis: hypersensitivity myocarditis (acute eosinophilic myocarditis) and a more severe form, acute necrotizing eosinophilic myocarditis. In the more severe form, acute necrotizing eosinophilic myocarditis, case fatality approximates 50%.<sup>[58]</sup>

**Pulmonary involvement:** Pulmonary involvement may initially present with dyspnoea, cough or pleurisy. The manifestation is diverse, ranging from impaired pulmonary function tests, interstitial pulmonary infiltrates, pneumonia, pulmonary nodules, effusion and acute respiratory distress syndrome (ARDS). In a systematic review of reported DRESS/DIHS cases with pulmonary involvement, pneumonitis was the most common (50%), followed by ARDS (31%) and pleural effusion (23%).<sup>[59]</sup>

**Blood:** Haematologic abnormalities are common in DRESS/DIHS with eosinophilia (95%) and atypical lymphocytes (70%) being the most common. Other findings include leukocytosis, neutrophilia, lymphocytosis, monocytosis, thrombocytosis and thrombocytopenia.<sup>[49]</sup>

Other reported systemic involvements include neurological (e.g. encephalitis, Bell's palsy, peripheral neuropathy), gastrointestinal (e.g. cholecystitis, pancreatitis, colitis, intestinal perforation), myositis as well as thyroid dysfunction. The acute phase of the disease is prolonged. 90% of cases persist beyond 15 days and up to 20% of patients persist beyond 90 days.<sup>[60]</sup>

In addition, the clinical course may be punctuated by relapses and flare-ups. The latter occur in up to 25% of DRESS and such reactions are typically cutaneous, although organ involvement may occur as well.<sup>[61]</sup>

Flare-up reactions typically occur in patients treated with systemic corticosteroids that has undergone rapid dose tapering and this may be related to a viral reaction of human herpes virus. Relapses can occur with the re-introduction of structurally different drugs, antibiotics in particular, which were administered during the acute phase of the disease.<sup>[62]</sup>

#### 1.4.2.4. Prognosis and outcome (long-term sequelae)

The case fatality rate in DRESS varies between 2-10%. The presence of cytomegalovirus (CMV) reactivation is a poor prognostic factor.<sup>[20]</sup> Long-term sequelae have been reported in up to 12 % of survivors, such sequelae are typically autoimmune in nature and consist of Grave's disease, type 1 diabetes mellitus, vitiligo, alopecia areata, autoimmune hemolytic anemia and lupus erythematosus.<sup>[63,64,65]</sup>

### 1.4.3. Acute generalized exanthematous pustulosis

#### 1.4.3.1. Epidemiology

AGEP was originally classified as a variant of generalized pustular psoriasis (GPP), termed exanthematic pustular psoriasis. In a comprehensive review of 104 GPP cases in 1968, Baker & Ryan, identified five cases of exanthematic GPP which were characterized by acute onset of numerous discrete pustules in patients with no known history of psoriasis. Exanthematic GPP usually develops after upper respiratory tract infection (URTI) or after ingestion of drugs used to treat URTI. It is self-limiting and resolved spontaneously in one to two weeks.<sup>[66]</sup> Without a prior history of psoriasis and the lack of recurrence, the authors postulated that these skin eruptions were likely triggered by drugs and/or infections<sup>[56,67]</sup> Baker and Ryan's description of exanthematic GPP is reminiscent of AGEP, a term coined by Beylot et al.<sup>[67]</sup> in 1980 to describe this distinctive drug-induced eruption.

AGEP is a rare SCAR with reported incidence of one to five cases per million per year.<sup>[27]</sup> A recent retrospective review of 340 probable or definite cases of AGEP based on EuroSCAR criteria from 10 academic dermatology departments in the U.S. between January 1, 2000, and July 30, 2020 showed a female preponderance (62.9%) with a mean age of 57.8 ( $\pm$ 17.4) years.<sup>[28]</sup> Female preponderance was also observed in the EuroSCAR study of nine cases<sup>[29]</sup> as well as studies from France<sup>[30]</sup>, Israel<sup>[31,32]</sup>, Malaysia<sup>[33]</sup>, Singapore<sup>[19]</sup> and Taiwan.<sup>[68]</sup> Although no gender variation was observed in some studies, a recent literature review of 250 case reports or case series which included 297 AGEP cases confirmed a female preponderance.<sup>[34]</sup>

#### 1.4.3.2. Common etiology (medicinal products)

The majority (> 85%) of AGEP cases are drug-induced.<sup>[66,67]</sup> Infections with Parvovirus B19, CMV, Coxsackie B4 and Mycoplasma pneumoniae have been implicated. However, the EuroSCAR case control study of 97 cases of AGEP with 1009 normal controls found no significant risk for infections.<sup>[29]</sup> Hypersensitivity to mercury, Rhus (lacquer) and spider bites have also been reported as triggers for AGEP.<sup>[67]</sup> Aminopenicillins, pristinamycin, sulfonamides, quinolones, hydroxychloroquine, terbinafine and diltiazem are frequent causative drugs, but the list of reported culprit medicinal products is very long. A recent review identified 93 drugs, which caused 259 positive patch tests in 248 patients with AGEP. Beta-lactam antibiotics caused the highest number of reactions (25.9%), followed by other antibiotics (20.8%), iodinated contrast media (7.3%), and corticosteroids (5.4%), together accounting for nearly 60% of all AGEP cases.

The highest number of AGEP cases attributed to drugs was due to amoxicillin (n = 36), followed by pristinamycin (n = 25), diltiazem (n = 14), amoxicillin-clavulanic acid (n = 13), clindamycin (n = 11), and iomeprol (n = 8).<sup>[69]</sup> In the US study of 340 validated cases, AGEP was attributed to medicinal

products (85.6%), intravenous contrast agents (2.1%), infection (0.9%), or unknown (11.5%) and  $\beta$ -lactam antimicrobials (41.7%) were the most common drug classes that were implicated, followed by non- $\beta$ -lactam antimicrobials (33.8%), anticonvulsants (6%) and calcium channel blockers (3.3%).<sup>[28]</sup>

#### 1.4.3.3. Clinical characteristics (that assist diagnosis by highlighting key clinical manifestations)

AGEP is characterized by a sudden onset of numerous pinpoint, nonfollicular sterile pustules on oedematous erythematous skin. The most characteristic feature of AGEP is its clinical course. It has a very rapid onset and equally rapid resolution. (Figure 5)

#### Figure 5. Numerous pinpoint, nonfollicular pustules and confluent pus lakes on oedematous erythematous plaques on the inner thigh of a patient with AGEP

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Skin lesions appear rapidly within 24-48 hours of medicinal product exposure and resolve as rapidly within five to seven days upon medicinal product withdrawal followed by collarette pin-point desquamation. Distribution is usually widespread but may be limited, in which case lesions are usually confined to body folds. Flexural predominance and facial involvement are characteristic. Mucosal involvement is uncommon. It is reported in about 20% and usually manifest as nonerosive cheilitis. Skin eruption is usually pruritic. The pinpoint pustules may coalesce to form bigger, but subcentimetre pustules. Atypical presentations such as huge erosions resembling TEN, purpuric and erythema multiforme-like lesions have been reported.

Skin eruptions in AGEP are often accompanied by fever  $\geq 38.0$  °C. In general, AGEP resolves fully within 15 days. In a study of 58 patients with AGEP, 17% had internal organ involvement (namely hepatic, renal and pulmonary dysfunction) that resolved on drug withdrawal and supportive treatment with no mortality.<sup>[27]</sup> Neutrophilia, elevated CRP and re-challenge are identified as risk factors for organ involvement. In a recent U.S. study, 8.4% of 298 patients with AGEP had an acute elevation of aspartate aminotransferase and alanine aminotransferase levels with a peak at 6 (IQR, 3-9) days

and 7.8% of 319 patients experienced acute kidney insufficiency, with at 4 (IQR, 2-5) days after onset of AGEF. Reported case fatality of AGEF is 5% mainly due to secondary infections in older patients with comorbidities. All-cause mortality in the study population within 30 days was 3.5%, but none was deemed to be due to AGEF.<sup>[66]</sup>

#### 1.4.3.4. Laboratory features

AGEF is almost always accompanied by absolute neutrophilia (> 7000/mL) which was seen in about 85% of 309 cases with available data in the U.S. study.<sup>[67]</sup> Thirty to 50% of patients had eosinophilia and 65-75% of patients had hypocalcemia.<sup>[29,67]</sup> Key histopathologic features of AGEF include intracorneal, subcorneal and intra-epidermal spongiform pustules containing a mixed infiltrate of neutrophils and eosinophils.<sup>[70]</sup>

Other epidermal features include keratinocyte necrosis, neutrophilic exocytosis and mild psoriasiform hyperplasia. Characteristic dermal findings are papillary oedema, a neutrophil-rich superficial to mid-dermal perivascular and interstitial infiltrates that regularly contain eosinophils. Red blood cell extravasation and mild leukocytoclasia are common, but frank vasculitis is not a feature.

#### 1.4.3.5. Prognosis and outcome

AGEF is a rare distinctive SCAR. It may be associated with systemic complications in a minority of patients and typically resolves upon withdrawal of culprit medicinal products. Reported case fatality is 2-5%.<sup>[35]</sup> A retrospective review of 340 patients with AGEF across the USA from 2000 to 2020 reported that the all-cause mortality within 30 days was 3.5%.<sup>[35]</sup>

### 1.4.4. Generalized bullous fixed drug eruption

#### 1.4.4.1. Epidemiology

GBFDE may be defined as widespread typical FDE with blisters and erosions affecting more than 10% of BSA on at least three out of six sites:

1. head and neck,
2. anterior trunk,
3. back,
4. upper limbs,
5. lower limbs and
6. genitalia.<sup>[18]</sup>

FDE is most common in adults, but can affect children and the elderly whereas GBFDE mainly affects elderly patients.<sup>[16,17,18]</sup> In a survey of 58 patients with GBFDE, the median age of patients was 78 years (range 68–84 years).<sup>[17]</sup>

#### 1.4.4.2. Common etiology (medicinal products)

Since GBFDE may evolve from FDE after repeated exposure to the culprit medicinal product, implicated medicinal products are similar to those responsible for FDE, namely NSAIDs, antibiotics (namely sulfamethoxazole, tetracyclines, dapsone), barbiturates and paracetamol/acetaminophen. Other implicated substances include tartrazine in food and cold medication, and quinine in alcoholic beverages made with tonic water. GBFDE has been reported following influenza and COVID-19 vaccination.<sup>[71,72]</sup>

#### 1.4.4.3. Clinical characteristics (that assist diagnosis by highlighting key clinical manifestations)

GBFDE is characterized by well-demarcated erythematous, violaceous or dusky red round or oval patches with blisters and erosions. Most patients report a positive history of similar eruptions. GBFDE may be confused with SJS/TEN due to the extensive bullous eruption with erosions.

Clinical clues which favour a GBFDE diagnosis are: (Figure 6)

1. characteristic well-demarcated erythematous, violaceous or dusky red round or oval patches, which resolves with typical hyperpigmentation
2. absence of small spots and targetoid lesions,
3. lack of or minimal mucosal involvement,
4. lack of constitutional symptoms such as fever, and
5. rapid onset of rash within a few hours after drug exposure compared to 1-3 weeks reported in EN.

#### Figure 6. Many well-demarcated, dusky red, round or oval patches with blisters and erosions on the trunk and limbs of a patient with GBFDE

This figure was provided by the Working Group and included in the report with appropriate permission.



#### 1.4.4.4. Laboratory features

GBFDE and SJS/TEN share overlapping histopathologic features. Histopathologically, GBFDE is characterized by subepidermal blisters, vacuolar interface dermatitis with variable mild to moderate density of perivascular and interstitial infiltrate, composed of eosinophils and lymphocytes in both the superficial and deep dermis. Pigmentary incontinence is a typical feature and discrete apoptotic/necrotic keratinocytes are scattered throughout the epidermis. In contrast, SJS/TEN, especially TEN, is characterized by a near absence of or sparse inflammatory infiltrate and extensive, confluent full-thickness epidermal necrosis.

#### 1.4.4.5. Prognosis and outcome

GBFDE is generally associated with a much better prognosis than SJS/TEN based on case reports and small case series. The overall mortality rate has been reported to be 11.822%.<sup>[17,36]</sup> However, a case control study comparing 58 patients with GBFDE to 170 patients with SJS/TEN showed that there was no significant difference in the case fatality between the two groups. This study population was drawn from patients reported to the EuroSCAR group as potential SJS/TEN and diagnosis of GBFDE was validated based on the presence of at least two of the following criteria:

1. similar reaction in the past,
2. fewer than two mucous membranes involved,
3. absence of spots or target lesions,
4. large and well-demarcated blisters and erosions, and
5. lesions and erosions on at least two different sites of the body regardless of the extent of the lesions.

However, 31% of the 58 patients<sup>[17]</sup> had at least two affected mucosal sites. A validated international diagnostic criterion for GBFDE is needed to determine the burden of this rare SCAR accurately.

## 1.5. SJS/TEN/DRESS/AGEP overlap

Because the initial presentation of SCAR may vary, diagnosis is difficult and suggests the possibility of overlap among SCAR may occur. AGEP, with a confluence of pustules resulting in superficial detachment, may manifest similar to TEN.<sup>[73]</sup> Cases of “overlap” between DRESS and TEN have been reported, suggesting the difficulty in classifying SCAR under certain circumstances.<sup>[74]</sup> Various T-cell - mediated delayed hypersensitivity reactions can be related to the preferential activation of medicinal product-specific T cells with distinct functions. These complex immune reactions are not exclusive and can be combined. Therefore, an overlap of immune reactions is possible, even if one type is often dominant, and could explain clinical ambiguities among SCAR.

A retrospective study of SCAR cases revealed the frequent occurrence ( $n = 45$ ; 21%) of SCAR cases that were based on different diagnoses (possible, probable or certain), which reflects the clinical ambiguity among several SCAR.<sup>[75]</sup> In such situations, the clinician is confronted with an uncertain diagnosis of several disease entities. However, only three “true” overlap SCAR were documented, representing 2.1% of the 145 confirmed SCAR cases.<sup>[77]</sup> The above results indicate that overlap of SCAR does exist but is rare, if the retrospective analysis was performed using a diagnostic algorithm.

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# CHAPTER 2.

## DIAGNOSIS AND IDENTIFICATION OF SCAR CASES

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### Chapter summary

- ▶ The first step in analysing a putative SCAR is to make a diagnosis even if tentative. DRESS, SJS/TEN and some other SCAR conditions have defined diagnostic criteria which may overlap and can hence be challenging to diagnose in the earliest stages.
- ▶ The HCP must determine medicinal product exposure (name and dosage) and lag period (the time between initiation of the medicinal product and the onset of the first symptoms of the ADR).
- ▶ All medications, especially those taken in the eight weeks prior to the cADR, must be considered as possible causative agents.

### Conclusions or recommendations

A SCAR diagnosis should consider patient history, visual assessment (appearance, morphology), severity and the presence of systemic symptoms, skin histopathology, followed by a causality assessment in the individual patient.

## 2.1. Introduction

ADRs have a wide spectrum of clinical manifestations. They are caused by various medicinal products and result from varied pathophysiologic mechanisms. Hence, their diagnosis and management are challenging. cADRs can range in clinical manifestations; from a mild exanthem involving only the skin to a reaction including systemic symptoms in addition to the skin manifestations, which can be fatal such as in the cases of life-threatening ADRs.<sup>[1]</sup>

Generally, cADRs are either common and mild or rare and severe reactions. However, medicinal products associated with common and severe reactions are typically not approved for clinical use. Rare and mild reactions usually go unnoticed or are not reported by patients. In most cases, cADRs are classified as “simple” or “complex.” A “simple” reaction only involves the skin, while a “complex” reaction includes systemic involvement of organs in addition to involvement of the skin.<sup>[2]</sup>

### 2.1.1. Diagnosis

The diagnosis of a cADR is generally based on three key clinical elements:

1. Appearance: the morphology of the cADR including four main categories of the primary lesion: maculopapular (exanthem, enanthem), urticarial, bullous and pustular. Other considerations include the body distribution and sites affected; for example, involvement of two or more mucous membranes.
2. Systemic signs that differentiate between a simple reaction involving only the skin and a complex reaction that comprises systemic involvement in addition to the skin.
3. Histology: histopathology and, if relevant, direct immunofluorescence studies of skin biopsies to confirm the clinical impression and to distinguish between a cADR and other skin diseases.

### 2.1.2. Criteria for diagnosis

If available, validated diagnostic criteria of specific types of cADRs should be used. Currently, only acute generalized exanthematous pustulosis (AGEP) and drug reaction with eosinophilia and systemic symptoms (DRESS) have published validated diagnostic criteria. This chapter provides a practical approach to diagnosing and identifying SCAR cases.<sup>[3,4]</sup>

## 2.2. General considerations for assessment

### 2.2.1. Patient history including time to onset

First, the patient's exposure to the medicinal product must be ascertained by the patient, the patient's family, pharmacists or others who might know which medications the patient was taking prior to the AE. Second, it is crucial to carefully analyse the lag period of an ADR when determining the causative agent since different cADRs have different timelines. The lag period can be defined as the time between initiation of the medicinal product and onset of the first symptoms of the ADR.

All medications, especially those taken in the eight weeks prior to the cADR, must be considered as possible causative agents and physicians should ask patients about any over-the counter medications, supplements, traditional/herbal medicines, illicit substances as well as prescription medicinal products.

The HCP can produce a graphic illustration of the medicinal product exposure timeline so as to visualize the chronology. For each medicinal product, the timeline should include the start date of the medication, dosage and end date as well as any signs or symptoms present throughout this period.

Evaluating systemic signs that differentiate between a simple and a complex reaction is essential. Systemic involvement is determined by assessing the patient's symptoms such as fever, facial oedema, malaise, chills, dyspnoea, cough, palpitations, nausea, vomiting, diarrhoea, sore throat and arthralgia. Additional information to be gathered includes known medicinal product allergies of the patient and his/her family members, and baseline health status including cutaneous diseases.<sup>[5,6]</sup>

### 2.2.2. Morphology description and physical exam findings

It is advisable to assess primary lesion morphology of the cutaneous eruption, which includes the four following main types: exanthematous, urticarial, pustular, and blistering. Moreover, diagnosing cADRs involves two major steps, namely determining morphology and examining systemic involvement.

Physical examination includes:

- ▶ Assessment of patient's basic signs: heart rate, blood pressure, oxygen saturation and fever,
- ▶ Assessment of the morphology of primary and secondary skin lesions,
- ▶ Assessment of mucous membrane involvement: ocular, oral and genital,
- ▶ Additional assessments: facial oedema perianal area, nails and hair, palpation of lymph nodes.

## 2.2.3. Additional clinical information

### 2.2.3.1. Skin biopsy (hematoxylin and eosin stain (H&E), immunofluorescence studies)

Skin biopsy for histology must be conducted, and, if relevant, direct immunofluorescence studies as well.

### 2.2.3.2. Specialty consultation

In patients with a suspected complex cADR (systemic involvement), it is prudent to conduct a multidisciplinary assessment based on the clinical signs and symptoms in both the acute stage and follow-up period subsequent to recovery.<sup>[7,8,9]</sup>

### 2.2.3.3. Assessing systemic involvement

We recommend that patients with cADRs be assessed for systemic involvement because the severity of skin manifestations does not always mirror the severity of the systemic involvement. In addition to assessing systemic involvement based on the patient's signs and symptoms, basic laboratory screening is advised, which includes a full blood count, liver and renal function tests, and urine analysis.

## 2.3. Assessing severity

The severity of SCAR depends mostly on the haemodynamic status and the extent of cutaneous and systemic involvement. SCAR such as SJS/TEN or DRESS are classified as grade 3 to 5 based on the areas of involvement of body surface area, associated symptoms, and death in the current Common Terminology Criteria for Adverse Events (CTCAE). However, the grading of CTCAE is not specific to SCAR.<sup>[10]</sup> The following clinical and histopathological findings were found to be validated values for determination of severity in various types of SCAR.

### **SCORTEN**

This scoring system was developed to assess illness severity and predict mortality in patients with TEN. To optimize the predictive value of this tool, SCORTEN is to be performed on days 1 and 3<sup>[11]</sup> post-admission.<sup>[12]</sup>

### **Drug-Induced Hypersensitivity Syndrome and Drug Reaction with Eosinophilia and Systemic Symptoms Severity Score**

This scoring system is based on a variety of factors including age, exposure to a culprit medicinal product, need for pulsed prednisone, duration of medicinal product exposure after symptom onset, fever duration, percent BSA, appetite loss, liver involvement, renal dysfunction and C-reactive protein (CRP). Higher scores ( $\geq 4$ ) were associated with CMV reactivation and CMV-related complications, higher steroids doses, longer hospitalizations and higher risk of fatal outcomes.<sup>[13]</sup>

## 2.4. SCAR case definition and diagnosis

### 2.4.1. Stevens-Johnson syndrome and toxic epidermal necrolysis

#### 2.4.1.1. Criteria for diagnosis

Stevens-Johnson syndrome (SJS) and toxic epidermal necrolysis (TEN) can be defined as different degrees of a severe, acute and life-threatening mucocutaneous reaction. Therefore, SJS/TEN can be referred to as a single entity on this disease spectrum. The SJS/TEN classification as defined by Bastuji-Garin et al., is based on the extent of epidermal detachment and the presence of characteristic skin lesions.

When evaluating the extent of epidermal detachment, only necrotic skin that is already detached (e.g. blisters, erosions), or detachable skin (positive Nikolsky sign whereby slight rubbing of the skin results in exfoliation of the outermost layer) should be considered. Diagnostic criteria based on clinical characteristics of skin and mucous membranes, histology assessment, lag period and systemic signs remain to be defined.<sup>[14]</sup>

#### 2.4.1.2. Histology

Among the typical histopathologic characteristics are extensive keratinocyte destruction and apoptosis with separation of the epidermis from the dermis at the dermo-epidermal junction. In addition, a paucicellular, dermal mononuclear infiltrate has been commonly described as well as lymphocytes that cross the dermo-epidermal junction with moderate infiltration of the epidermis.<sup>[15]</sup>

#### 2.4.1.3. Genetics

In the last few decades, progress has been made in understanding the pathogenic mechanisms of SJS/TEN, in particular, the important role of HLA alleles. Recognition of the culprit medicinal products by specific HLA molecules contributes to the pathogenesis of inducing cytotoxic responses in SJS/TEN. Although association with a specific HLA risk allele might be necessary, it is not sufficient for SJS/TEN to develop. Individual differences in medicinal product metabolism or clearance may also be significant in SJS/TEN development, recovery or prognosis.<sup>[16]</sup> (See also [Chapter 4.3](#), [Chapter 4.2.1 Table 5](#) and [Chapter 4.2.2 Table 6](#))

#### 2.4.1.4. Biomarkers<sup>1</sup>

A rapid immunochromatographic test for serum granulysin was found to be useful in diagnosing SJS/TEN.<sup>[17]</sup>

#### 2.4.1.5. Skin testing

The value of medicinal product skin tests in SJS/TEN:

- ▶ patch tests can be performed but are rarely positive;
- ▶ prick tests add no value and intradermal medicinal product tests are contraindicated since it may induce a flare up reaction.<sup>[18]</sup>

<sup>1</sup> See also [Chapter 4](#).

### 2.4.1.6. Pitfalls in diagnosis

The major differential diagnoses of SJS/TEN include:

- ▶ Staphylococcal Scalded Skin Syndrome,
- ▶ Generalized bullous fixed drug eruption (GBFDE),
- ▶ Acute Graft-Versus-Host Reaction,
- ▶ TEN-Like Lupus Erythematosus or Lupus-Associated TEN,
- ▶ Autoimmune blistering diseases,
- ▶ Bullous phototoxic reactions,
- ▶ AGEP,
- ▶ DRESS, and
- ▶ Erythema multiforme (minor and major).<sup>[19]</sup>

## 2.4.2. Drug reaction with eosinophilia and systemic symptoms and drug-induced hypersensitivity syndrome

### 2.4.2.1. Criteria for diagnosis

Drug reaction with eosinophilia and systemic symptoms (DRESS) is characterized by stepwise multi-organ involvement that may include skin, haematological and solid organs (see also [Chapter 1.4.2.3](#)). Cutaneous manifestations of DRESS are diverse. There are two diagnostic criteria: the Japanese consensus group criteria (2006) and the RegiSCAR group criteria (2007).

An important distinction between the two scoring systems is the requirement of human herpes virus-6 (HHV6) reactivation for typical drug-induced hypersensitivity syndrome (DIHS) in the Japanese scoring system.<sup>[4,20]</sup>

### 2.4.2.2. Histology

Histopathological characteristics of patients with DRESS are generally non-specific. No single finding can be used to distinguish DRESS from other cADRs or inflammatory skin disorders. Several commonly encountered histopathological patterns were identified in skin specimens of patients with DRESS such as spongiosis, interface dermatitis, vascular damage and superficial perivascular infiltration. A retrospective analysis of patients with DRESS found that spongiosis and keratinocyte damage were the most common epidermal changes. Spongiosis was associated with non-serious DRESS whereas confluent keratinocyte necrosis correlated with serious DRESS and frequent vascular changes.<sup>[21]</sup>

A moderate, dermal perivascular lymphocytic infiltrate was invariably present, containing eosinophils, neutrophils and/or atypical lymphocytes in most cases.<sup>[21]</sup> Another study found that the histopathology of DRESS features various associated inflammatory patterns in a single biopsy.<sup>[22]</sup> Although differentiated histopathological features of patients with DRESS cannot be identified, there are characteristics that might provide clues for diagnosis or indicate severity. The most important of these observations is the co-existence of the aforementioned patterns in a single skin specimen.

Approximately 50–60% of patients with DRESS have at least two of the above-mentioned patterns in a single specimen.<sup>[22,23]</sup> In addition, patients with three histopathological patterns (spongiosis, interface dermatitis and vascular damage) that co-exist in a single specimen have a considerably higher likelihood of having a definite case of DRESS.<sup>[23]</sup>

### 2.4.2.3. Genetics

It is generally believed that DRESS is the result of a complex interaction between exposure to a medicinal product, genetic predisposition and viral reactivation. Variations in HLA alleles are among the most important risk factors for DRESS. Thus, ancestry is a significant predisposing factor for DRESS. More specifically, the culprit medicinal product is believed to interact with a particular HLA to form a complex-hapten which is then presented to naive T cells via the T-cell receptor, thereby stimulating an immune response.

It is generally believed that DRESS is the result of a complex interaction between exposure to a medicinal product, genetic predisposition and viral reactivation. Variations in HLA alleles are among the most important risk factors for DRESS. Since certain high-risk alleles are more present in some demographic groups than in others, ancestry is a significant predisposing factor for DRESS. (See also [Chapter 4.2.2 Table 6](#))

More specifically, the culprit medicinal product is believed to interact with a particular HLA to form a complex-hapten which is then presented to naive T cells via the T-cell receptor, thereby stimulating an immune response.<sup>[24]</sup>

### 2.4.2.4. Biomarkers<sup>2</sup>

Thymus and activation-regulated chemokine (TARC) recruits Th2-polarized T cells into local inflammation sites, leading to a Th2-type immune reaction. TARC levels were found to be markedly higher in patients with DRESS than in patients with other cADRs. Hence, the baseline serum TARC level can be used as a marker for the early diagnosis of the DRESS in patients presenting with a maculopapular rash.<sup>[25]</sup>

### 2.4.2.5. Skin testing

The value of medicinal product skin tests in DRESS:

- ▶ patch tests can be useful and must be performed at least six months after the disappearance of the rash and biological disturbances,
- ▶ prick tests may add value only in some cases with delayed reactions and intradermal medicinal product tests have to be cautiously applied.<sup>[18]</sup>

### 2.4.2.6. Pitfalls in diagnosis

There are many conditions that mimic DRESS. Differential diagnoses include viral infections such as Epstein-Barr virus (EBV), Severe Acute Respiratory Syndrome coronavirus-2 (SARS-CoV-2), CMV and Human Immunodeficiency Virus (HIV) as well as bacterial sepsis, toxic shock syndrome, Kawasaki disease, Still disease, lymphoma, mycosis fungoides, hypereosinophilic syndrome, connective tissue diseases, hemophagocytic syndrome, angio-immunoblastic lymphadenopathy and other cADRs.<sup>[26]</sup>

## 2.4.3. Acute generalized exanthematous pustulosis

### 2.4.3.1. Criteria for diagnosis

Acute generalized exanthematous pustulosis (AGEP) is defined as a severe acute pustular cutaneous reaction characterized by a rapid clinical course. Generally, the morphology of AGEP is an acute oedematous erythema with a burning sensation and/or itch, which leads to the development of dozens

<sup>2</sup> See also [Chapter 4](#).

to hundreds of small (pinhead sized) non-follicular sterile pustules with a tendency toward large folds or widespread distribution. Fever and leukocytosis with neutrophilia are almost always present.

The AGEP validation score developed by the Euro-SCAR study group is a standardized scoring system comprising data about clinical features (morphology and clinical course) and histopathology. Based on this score, AGEP cases can be placed into the following categories: no AGEP, possible AGEP, probable AGEP and definite AGEP.<sup>[3]</sup>

#### 2.4.3.2. Histology

The histopathological features of AGEP consist of sub-/intra-corneal and/or intra-epidermal pustules or a combination thereof. The primary epidermal features are necrotic keratinocytes such as incidental segmental necrosis and spongiosis with neutrophil exocytosis. The primary dermal features are papillary oedema with mixed superficial interstitial and mid/deep-dermal infiltrates containing neutrophils and eosinophils.<sup>[27]</sup>

#### 2.4.3.3. Genetics

Genetic predisposition plays an important part in the pathogenesis of AGEP. Specific HLAs were found to be more common in AGEP patients than in the general population.<sup>[28]</sup> Also, mutations in the IL36RN gene were found in some patients with AGEP.<sup>[29]</sup>

#### 2.4.3.4. Biomarkers<sup>3</sup>

A recent publication stated that IL17E, inducible nitric oxide synthase and arginase1 may serve as new biomarkers in the identification of neutrophilic dermatoses including AGEP.<sup>[30]</sup>

#### 2.4.3.5. Skin testing

The value of medicinal product skin tests in AGEP:

- ▶ patch tests are useful,
- ▶ prick tests and intradermal medicinal product tests add no value.<sup>[18]</sup>

#### 2.4.3.6. Pitfalls in diagnosis

Differential diagnoses of AGEP include a variety of rashes and skin diseases with pustules, mainly pustular psoriasis; subcorneal pustular dermatosis (Sneddon-Wilkinson); pustular vasculitis and DRESS.<sup>[31]</sup>

### 2.4.4. Generalized bullous fixed drug eruption

#### 2.4.4.1. Criteria for diagnosis

The diagnosis of generalized bullous fixed drug eruption (GBFDE) can often be made on clinical grounds based on distinctive appearance and history of a similar eruption with medicinal product exposure. Skin biopsy may be performed to confirm the diagnosis when the clinical presentation is ambiguous. No diagnostic criteria exist.

<sup>3</sup> See also [Chapter 4](#).

#### 2.4.4.2. Histology

Characteristic histopathologic findings of GBFDE consist of a sub-epidermal blister or vacuolar alterations at the dermo-epidermal junction and a variable number of necrotic keratinocytes within lesional intact epidermis. Though the infiltrate of inflammatory cells is variable, there is usually a brisk, moderately dense perivascular infiltrate of lymphocytes and interstitial eosinophils. GBFDE shows increased inflammation with eosinophils, fewer necrotic keratinocytes and more melanin-containing dermal macrophages compared with SJS/TEN. Nevertheless, GBFDE may have full-thickness epidermal necrosis, which histologically strongly resembles and may be almost indistinguishable from SJS/TEN.<sup>[32]</sup>

#### 2.4.4.3. Genetics

In GBFDE, CD8+ T cells play a critical inflammatory role by recognizing certain medicinal products in association with specific major histocompatibility complex (MHC) class I molecules found on keratinocytes. There are several variations of HLA-A or HLA-B associated with GBFDE.<sup>[33]</sup>

#### 2.4.4.4. Biomarkers<sup>4</sup>

Serum granulysin levels have been found to be significantly lower in GBFDE compared to SJS/TEN, leading some authors to advocate the use of a serum granulysin test as a method to rapidly diagnose SJS/TEN.<sup>[34]</sup>

#### 2.4.4.5. Skin testing

Patch testing is the best confirmation method. Patch testing is conducted on a hyper-pigmented site in an area of previous FDE, exploiting normal skin as a control. Patch testing should be performed a few weeks after the lesions resolve to avoid a false negative result due to a refractory period.<sup>[35]</sup> An additional method of FDE confirmation is performed using the lymphocyte transformation test, which aims to measure a sensitized T-cell reaction in response to the *in vitro* addition of the medicinal product.<sup>[36]</sup>

#### 2.4.4.6. Pitfalls in diagnosis

The most important differential diagnosis is between GBFDE and SJS/TEN. Patients with GBFDE tend to be older and less likely to have constitutional symptoms than patients with SJS/TEN. Mucosal involvement is less frequent and less severe in GBFDE. GBFDE always presents within one to two weeks (but most frequently within 48 hours) of ingestion of the causative medicinal product, while latency between medicinal product exposure and clinical presentation of SJS/TEN is most commonly one to three weeks. SJS/TEN skin lesions tend to coalesce and may have atypical targets, while GBFDE patches and bullae tend to be well-demarcated and have larger areas of normal skin between lesions. GBFDE heals with hyperpigmentation but no scarring, whereas SJS/TEN is associated with scarring. A history of a similar less severe skin eruption induced by the culprit medicinal product can often be elicited in cases of GBFDE.<sup>[37]</sup>

<sup>4</sup> See also [Chapter 4](#).

## 2.5. Interactions between patient, family, healthcare professional and regulatory agencies for reporting

### Interactions with patients and family

Good communication strategies will aid in the interactions with a patient and their family following a suspected SCAR. HCPs are recommended to:

1. Listen to the patient in a respectful and empathetic manner in order to characterize their experience. This is part of the diagnostic process.
2. Acknowledge the reality of the experience for the patient.
3. Offer the patient clear information on his/her suspected SCAR (see Table 4 below), the name of the suspect medicinal product if it is known, potential cross-reacting medicinal products, and medicinal product, which can be safely taken as a substitute. In addition, advise the patient to wear a medic-alert bracelet.
4. Include family counselling in the management plan given that the predisposition to some SCAR may be genetic.

### 2.5.1. The role of healthcare professionals

HCPs should obtain information including the type of SCAR, the clinical information used to ascertain the most likely diagnosis, and the suspect medicinal product(s). This information must be incorporated into the patient's medical records. At the very least and using patient-focused language, the HCP should inform the patient and his/her family about the SCAR and the suspect medicinal product(s), if identified.

**Table 4. Example of information to be provided to the patient and the patient's family**

|  |   |
|--|---|
| Severe Cutaneous Adverse Reactions   | A group of hypersensitivity reactions with a variety of clinical signs and symptoms that are typically triggered by taking medications.   |
| Stevens-Johnson syndrome and toxic epidermal necrolysis  | A hypersensitivity reaction which can involve the skin and mucous membranes (such as the eyes, mouth/throat, genital areas) and cause widespread redness of the skin and blistering with burn-like lesions from large areas of detached skin. |
| Drug reaction with eosinophilia and systemic symptoms and drug-induced hypersensitivity syndrome | A hypersensitivity reaction which can include fever, widespread skin rash, multiple organ involvement (such as liver, heart, and lung), and an increase of eosinophils in the blood.  |
| Acute generalized exanthematous pustulosis   | A hypersensitivity reaction that presents with fever, increased white blood cells, and widespread redness of the skin with small pustules. The small pustules can merge and lead to large areas of detached skin.                             |

|   |   |
|---|---|
| Generalized bullous fixed drug eruption | A hypersensitivity reaction that typically starts with round red/purple or hyperpigmented lesions that can have blistering within the lesions. With repeated occurrence, more lesions appear and can be widespread and appear similar to Stevens-Johnson syndrome/toxic epidermal necrolysis. |
|---|---|

## 2.5.2. Regulatory agencies

If a SCAR has occurred subsequent to treatment with a medicinal product, both patients and HCPs alike, even if uncertain about the causal relationship with the medicine, should report the SCAR to the manufacturer and appropriate regulatory agencies by means of the applicable regional pharmacovigilance reporting system in accordance with local regulations. Manufacturers are required to report suspected ADRs to regulatory agencies/authorities in accordance with regional laws and regulations, which has led to the creation of global databases, e.g. the FDA Adverse Event Reporting System<sup>[38]</sup> and EudraVigilance maintained by European Medicines Agency (EMA)<sup>[39]</sup> for the European Union (EU) regulatory network. Many countries are members of the WHO Programme for International Drug Monitoring and in this context provide their national suspected ADR reports to the WHO Collaborating Centre Uppsala Monitoring Centre (UMC) which maintains the global database VigiBase for collecting and analysing the reports.<sup>[40]</sup>

It is essential that regulatory agencies receive the information regarding the occurrence of a SCAR and are able to assess the clinical information on which the diagnosis, causality, and severity are based. The latter information may be submitted at a later stage. Guidance is available on reporting of safety data to appropriate authorities and on the content of safety reports.<sup>[41,42]</sup>

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# CHAPTER 3.

## CASE MANAGEMENT IN CLINICAL CARE

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### Chapter summary

- ▶ Treatment goals in the management of SCAR include withdrawal of the culprit medicinal product, symptom management, avoidance of acute morbidity and fatal outcomes as well as the long-term monitoring and treatment of chronic sequelae.
- ▶ The culprit medicinal product that is responsible for the SCAR should be identified and withdrawn immediately. SCAR cases should be managed in reference centres.
- ▶ Supportive care is the cornerstone of treatment and involves fluid and nutrition optimization, skin care and dressings, thermoregulation, pain management as well as the monitoring and treatment of organ complications and infections.
- ▶ Various systemic treatments have been proposed for SJS/TEN, DRESS and AGEP, but the level of evidence remains low.
- ▶ Long-term follow up of SCAR cases is required in order to prevent and mitigate long-term sequelae as well as avoid the reintroduction of the medicinal product.

### Conclusions or recommendations

Early diagnosis and transfer of SCAR to a reference centre is vital. Key management principles include the withdrawal of the culprit medicinal product and supportive care. The use of specific immunomodulatory treatments requires further validation.

## 3.1. Introduction

In all cADRs, identification and withdrawal of the culprit medicinal product is the cornerstone of care. Withdrawal of drugs, particularly those with a short half-life, has been shown to improve outcomes in SJS/TEN.<sup>[1]</sup>

In some cases, the decision to “treat-through” the reaction can be made if the benefits outweigh the risks such as in the context of life-sustaining treatments for which there are no alternative medicinal products, the disease phenotype is benign and there are no features of progression to SCAR. Investigations, supportive care and specific therapy are tailored according to phenotype, severity and clinical course.

### 3.1.1. Management of cADRs - non-SCAR

Exanthematous drug eruptions (also known as morbilliform drug eruptions, maculopapular rash) are the most common cADRs, accounting for up to 80% of cases.<sup>[2]</sup> However, an exanthematous reaction may be the initial presentation of SCAR as such, serial examination and follow-up is warranted.

Exanthematous drug eruptions are self-limiting. Emollients and antihistamines may provide symptomatic relief of pruritus. Potent topical corticosteroids are often prescribed to reduce the inflammation and symptoms associated with the rash. However, clinical evidence for such an approach is lacking. Systemic corticosteroids are rarely required.<sup>[2]</sup>

### 3.1.2. Management of SCAR

The treatment goals in SCAR include symptom management, avoidance of short-term morbidity, prevention of death as well as prevention and treatment of long-term sequelae. It involves both supportive care and specific treatment for each disease entity. It is recommended that SJS/TEN cases should be managed in reference centres. These are usually specialized dermatological centres, burn or intensive care units (ICU) with significant experience and protocols in place for the management for such rare conditions. It has been shown that delayed transfer to such units is associated with poorer outcomes.<sup>[3]</sup> Similarly, prognosis is improved when care is delivered in centres with higher volumes.<sup>[4]</sup>

### 3.1.3. Supportive care

The extensive involvement of the skin in SCAR impairs its physiological function, resulting in increased fluid loss, hypovolemia, hypothermia, protein loss, risk of bacteraemia and multi-organ failure. The aim of supportive care is to restore homeostatic function and manage the complications associated with skin failure.

Components of supportive care include the following:

#### 3.1.3.1. Fluids and nutrition

SCAR are catabolic states and there is also increased transepidermal water loss, particularly in SJS/TEN. This is compounded by decreased oral intake in many patients with severe oropharyngeal involvement, particularly in SJS/TEN. Strict monitoring of fluid intake and output is essential. Fluid resuscitation and replacement are necessary.

Fluid and electrolyte derangements are most marked in SJS/TEN, and an initial resuscitation of 2 ml/kg/%TBSA detached has been proposed and subsequent fluid requirements should achieve urinary output of 0.5 to 1 ml/kg/h.<sup>[5]</sup> Enteral feeding is preferred. However, oral intake of food may be limited by pain, and a nasogastric tube may be required in order to achieve nutritional demands. Estimated caloric requirements are 20-25 cal/kg/d during the initial catabolic state of SJS/TEN and 25-30 cal/kg/d during the period of anabolic recovery.<sup>[5]</sup>

#### 3.1.3.2. Thermoregulation

The ambient temperature should be maintained at 28°C to prevent hypothermia.

#### 3.1.3.3. Skin, mucosal and wound care

In a SCAR without epidermal detachment (DRESS, AGEP), liberal application of emollients and potent/ultrapotent corticosteroids has been advocated. Patients with SJS/TEN should be nursed in single rooms with reverse barrier nursing, if available. The ideal wound care strategy in SJS/TEN has not been established and remains variable across centres. Generally, it may involve either a surgical approach whereby the detached epidermis is removed operatively and replaced with either biologic membranes or dressings or a conservative approach whereby the detached/detachable skin is left in situ as a biological dressing.

In the conservative approach, minimal manipulation of the skin is advocated. Saline or antiseptic baths can be used, followed by petrolatum jelly and non-adhesive dressing. Secondary dressings may be applied to absorb the exudate. To date, there have been no controlled studies that evaluate these two approaches. However, a conservative approach may result in less severe post-inflammatory skin changes and avoid the risks associated with sedation and anaesthesia in the surgical approach.<sup>[6,7]</sup>

During the acute phase of a SCAR, mucosal surfaces can be involved, particularly in SJS/TEN. The use of emollients and topical corticosteroids are recommended to reduce mucosal adhesions and long-term scarring. Oral mouthwash and topical oral analgesia may be helpful in reducing the mucosal discomfort. Similarly, urogenital involvement can affect up to 70% of patients. Early assessment by urologists/gynaecologists may be necessary to avoid long-term scarring.<sup>[8]</sup> In addition, the use of non-adhesive dressings, topical corticosteroids and vaginal moulds/dilators can be used to reduce strictures.

### 3.1.3.4. Pain management

In general, most SCAR are not painful with the exception of SJS/TEN. SJS/TEN is an intensely painful disease and the pain is aggravated by movement and wound manipulation. Pain severity should be monitored via a visual analogue scale of 0-10. Appropriate analgesia (paracetamol/acetaminophen, opioids) should be administered with the aim of reducing the pain score to two or below.

### 3.1.3.5. Monitoring of internal organ complications

SCAR are systemic conditions and the degree and characteristic of internal organ involvement vary according to the specific type of SCAR. Serial monitoring of routine investigations such as complete blood count (CBC), liver function tests, renal panel, cardiac and muscle enzymes may be required. In some setting, imaging studies such as radiographs, ultrasound, computed tomography and magnetic resonance imaging may be required. Due to the systemic nature of SCAR, a collaborative, multi-disciplinary approach is necessary.

#### 3.1.3.5.1. AGEP

Systemic complications occur in about 15% of cases of AGEP, with the liver being the most commonly affected organ. Other affected organs include kidneys, lungs and bone marrow. These complications are generally mild and typically improve subsequent to medicinal product withdrawal.<sup>[9,10]</sup>

#### 3.1.3.5.2. DRESS/DIHS

Systemic complications occur in at least 90% of patients and up to 20% of patients may have more than two organs involved.<sup>[11]</sup> The onset and clinical course of visceral involvement may not parallel skin involvement, hence, systematic follow-up and monitoring are needed. The liver is the most common visceral complication, occurring in up to 50-90% of cases.

Other organs involved include the kidneys, lungs, heart, bone marrow, as well as central and peripheral nervous system. Multiple organ involvement, such as pulmonary and cardiac as well as human herpes viral reactivation may confer a poorer prognosis.<sup>[12,13]</sup>

#### 3.1.3.5.3. SJS/TEN

Systemic complications are common in SJS/TEN and may be renal, pulmonary, gastrointestinal, or haematologic in nature though can arise in other organs as well. Pulmonary complications occur in up to 40% of patients and include specific changes such as trachea/bronchial mucosal sloughing as well as non-specific presentation of infection, pulmonary oedema and atelectasis.<sup>[14]</sup> Pulmonary involvement is a poor prognostic factor for mechanical ventilation and death. Acute renal failure occurs in up to 20% of patients with SJS/TEN. Risk factors for acute renal failure include sepsis, allopurinol, NSAIDs and antibiotics as culprit medicinal products as well as hypoalbuminemia and chronic kidney disease.<sup>[15]</sup>

Disseminated intravascular coagulation occurs in up to 20% of cases, and blood component transfusion may be necessary.<sup>[16]</sup> Leukopenia can occur during the acute phase of the disease and granulocyte-colony stimulating factor (G-CSF) may be required.<sup>[17]</sup> In view of multi-organ involvement, facilities and expertise for mechanical ventilation, organ support and ICU care should be made available.

### 3.1.3.6. Management of bacteraemia

Bacteraemia and sepsis can be SCAR complications, particularly in SJS/TEN. Sepsis increases the risk of fatal outcomes for SJS/TEN by three- to four-fold and accounts for up to 50% of all fatal outcomes for SJS/TEN.<sup>[18,19]</sup> The routine use of prophylactic antibiotics is not recommended in SJS/TEN, however, empirical antibiotics should be started once infection is suspected. Frequent sampling of the blood and skin may aid in the early diagnosis and management of bacteraemia.

Hypothermia and raised procalcitonin may be predictive of positive blood cultures.<sup>[17]</sup> Skin sampling has a good negative predictive value for bacteraemia. If skin cultures are negative for *Staphylococcal aureus* or *Pseudomonas aeruginosa*, it is unlikely that the blood cultures would be positive for such organisms.<sup>[20]</sup> Antimicrobial therapy should be culture directed, and dependent on the institutional microbiogram. Initial empirical therapy should include coverage for *Staphylococcal aureus*, *Pseudomonas aeruginosa* and other gram-negative bacteria. In burn units and ICUs, coverage for nosocomial organisms should be considered.

### 3.1.3.7. Management of ocular complications

Acute eye involvement occurs in up to 80% of patients with SJS/TEN.<sup>[21]</sup> The presentation ranges from conjunctival hyperaemia to extensive corneal ulcerations. As such, ophthalmic review and management during the acute and chronic phase of SJS/TEN is mandatory. During the acute phase of disease, in addition to topical eye drops such as lubricants, corticosteroids and antibiotics, systemic corticosteroids and amniotic membrane transplantation may also be performed.<sup>[22]</sup>

### 3.1.3.8. Laboratory tests

In view of systemic complications and the involvement of internal organs in SCAR, various laboratory tests and investigations may be performed, as indicated.

- ▶ CBC, renal function, LFT, muscle/cardiac enzymes, thyroid function tests, arterial blood gases, coagulation profile,
- ▶ Blood/wound/urine cultures, procalcitonin as indicated,
- ▶ Hepatitis serology, mycoplasma, chlamydia serology, antinuclear antibodies as indicated (particularly in DRESS),
- ▶ Human herpes viral serology (HHV6, EBV, CMV) may be needed to confirm diagnosis as well as a prognostic factor in DIHS/DRESS,
- ▶ Imaging studies: Ultrasound/computed tomography/magnetic resonance imaging may be needed to assess for internal organ involvement,
- ▶ ECG/Echocardiography may be necessary to assess for cardiac involvement.

### 3.1.4. Specific treatment

Although specific therapy is dependent on the type of SCAR, treatment recommendations are generally limited by the quality of the evidence.

#### 3.1.4.1. SJS/TEN

Supportive care remains the cornerstone of management. Current evidence is unable to support the routine use of any immunomodulatory agent over another. Various immunomodulatory agents have been proposed. These agents include systemic corticosteroids, cyclosporine, intravenous immunoglobulins (IVIG) with/without corticosteroids, anti-tumour necrosis factor (TNF)-alpha with/without corticosteroids and plasmapheresis. There have been two randomized controlled studies evaluating therapy in SJS/TEN. The first trial by Wolkenstein et al. evaluated the use of thalidomide, an inhibitor of TNF-alpha, was prematurely stopped due to increased mortality in the active arm.<sup>[23]</sup> The second, by Wang et al., evaluated the efficacy of etanercept, also a TNF-inhibitor, versus systemic corticosteroids.

There was no significant difference in terms of fatal outcomes, although both interventions showed a decrease in case fatality compared to that predicted by SCORTEN.<sup>[24]</sup> Several recent meta-analysis suggested that cyclosporine, etanercept, systemic corticosteroids as well as IVIG in combination with corticosteroids may have survival benefits. However, there was significant heterogeneity in these studies and study quality was poor.<sup>[25,26,27]</sup> Until improved evidence emerges, specific immunomodulatory treatments cannot be recommended in a routine manner.

#### 3.1.4.2. DRESS

There are no randomized trials that evaluate treatment for DRESS. In view of disease heterogeneity, a step ladder approach has been proposed.<sup>[28]</sup> In mild disease (no internal organ involvement, or mild liver involvement), systemic corticosteroids may be withheld and symptomatic treatment consisting of emollients and potent to ultrapotent topical corticosteroids may be sufficient.<sup>[29]</sup> If systemic corticosteroids are used, a slow taper is required to reduce the likelihood of flares. In severe disease (severe organ involvement, e.g. liver, renal, pulmonary, neurological, cardiac involvement), systemic corticosteroids are recommended. As systemic corticosteroid treatment increases the risk of infections, careful surveillance of infective complications are warranted. Various other immunomodulatory agents such as cyclosporine, IVIG, janus kinase (JAK) inhibitors have been utilized but evidence remains limited. In addition to immunomodulatory agents, organ support and emergent transplantation may be required in fulminant cases.

#### 3.1.4.3. AGEP

AGEP is generally self-limiting, although in some cases, it may cause fatal outcomes. Symptomatic treatment with emollients and topical potent to ultrapotent corticosteroids may suffice.<sup>[10,11]</sup>

#### 3.1.4.4. GBFDE

GBFDE is an extensive, bullous variant of FDE and may be challenging to differentiate from SJS/TEN. The prognosis of GBFDE is comparable to cases of SJS/TEN matched for age and extent of epidermal involvement. As such, similar supportive management principles to SJS/TEN should be carried out.<sup>[30]</sup> Likewise, supportive care is the most important component of care. Although the use of various immunomodulators such as corticosteroids and cyclosporine has been reported, evidence for such treatments remains anecdotal.

## 3.2. Special populations

### 3.2.1. Paediatric SJS/TEN

The prognosis of paediatric SJS/TEN is better compared to adult cases with an overall case fatality of 3% in TEN.<sup>[31]</sup> Unlike adult cases, which are attributed to medications in close to 80-90%, medications account for only 50% of paediatric cases with infections and idiopathic cases accounting for the rest.<sup>[32]</sup> As such, investigations evaluating for infective triggers such as *Mycoplasma pneumoniae* and *Chlamydia pneumoniae*, as well as appropriate antimicrobial treatment is warranted. In addition, recurrences of up to 18% have been reported,<sup>[33]</sup> and this may be due to higher incidence of infections as a trigger and possible misclassification of paediatric cases as EMM, which is more frequently recurrent compared to TEN.

Similar to the adult population, no immunomodulatory therapy has been shown to confer conclusive benefit. Whilst adult cases are recommended to be transferred to SJS/TEN reference centres, in paediatric populations, this may need to be balanced with the availability of paediatric expertise and facilities.<sup>[34]</sup>

### 3.2.2. Pregnancy

SJS/TEN is rare in pregnant patients due to the reduced medicinal product intake during gestation and younger age. The majority of reports are from HIV-positive patients who developed the reaction following the use of nevirapine.<sup>[35]</sup> Acute uro-gynaecological care in such patients is essential to prevent strictures as well as for normal vaginal delivery after the initial episode of SJS/TEN. Other specific pregnancy complications include premature labour and the need for emergent caesarean section, which accounts for up to 50% of all pregnancies in SJS/TEN.

Specific treatment recommendations mirror that for the general adult population. Maternal-fetal transmission of SJS/TEN is rare and has been anecdotally reported.<sup>[36]</sup> In a systematic review, maternal and neonatal mortality in SJS/TEN has been reported as 2.1% and 4.9%, respectively.<sup>[37]</sup> Pregnant cases of SJS/TEN should be managed in facilities with access to obstetric and neonatal expertise and facilities.

### 3.2.3. Renal failure

In a multi-centre cohort in the U.S., dialysis prior to presentation of SJS/TEN was the strongest independent prognostic factor for fatal outcomes (Odds Ratio of 16).<sup>[38]</sup>

### 3.2.4. Coloured skin

In the U.S., SJS/TEN was associated with skin colour or genetic factors, particularly Asians and Blacks with respective odds ratio of 3.3 and 2, respectively.<sup>[39]</sup> Such differences might be due to the inherent pharmacogenetic risks in certain ethnicities and the causal medicinal product. The initial presentation of SCAR may be under-recognized in skin of colour and may lead to a delay in diagnosis and treat.

### 3.3. cADRs induced by targeted therapy<sup>1</sup> or immunotherapy

The spectrum of cADRs is varied, ranging from common and mild to severe. Such reactions are typically classified according to the Common Terminology Criteria for Adverse Events (CTCAE) grading and management is grade dependent. Maculopapular rash or MPE is the most common presentation, but SCAR such as SJS/TEN have been reported. In SCAR, immunotherapy should be permanently discontinued.

Prednisolone/methylprednisolone is recommended based on consensus, however, evidence for this or other immunomodulatory agents is lacking. In severe cases, urgent dermatological consultation, inpatient care and transfer to reference centres may be necessary.<sup>[40]</sup>

### 3.4. Guidance and investigation post-reaction

Following the acute phase of the reaction, treatment/management goals include:

- ▶ Permanent discontinuation of culprit medicinal product, medicinal product allergy notification, allergy alert/bracelet. Cross-reactive medications to the culprit medicinal product should be avoided as well. For example, all oxicam NSAIDs such as meloxicam and piroxicam should be avoided in any case of oxicam NSAID-induced SCAR. Similarly, aromatic anticonvulsants such as phenytoin, phenobarbital and carbamazepine should be avoided in any aromatic anticonvulsant-induced SCAR.
- ▶ Long-term multi-disciplinary follow up to detect and manage any chronic complications from SCAR (see also [Chapter 1.4.1.5](#) and [Chapter 1.4.2.4](#)).
- ▶ Additional allergological evaluation to confirm medicinal product causality including both skin tests and in vivo tests may be available in specialty/research centres (see also [Chapter 2.4](#) and [Chapter 5.3.1](#)).

<sup>1</sup> American Cancer Society [Definition of Targeted Therapy](#)

## Chapter 3 – References

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# CHAPTER 4.

## BIOMARKERS FOR SCAR

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### Chapter summary

Numerous biomarkers have been discovered for SCAR that may have utility in diagnosis, evaluating prognosis, predicting risk to certain drugs, and monitoring patients. Genetic factors are the most extensively validated. HLA-B\*1502 has been uniformly linked to a risk for SJS/TEN in patients receiving carbamazepine and screening in certain populations has reduced the incidence of SJS/TEN. Numerous other HLA alleles also appear to increase the risk for a variety of different drugs known to cause SJS/TEN and other SCAR. Circulating and tissue biomarkers are less well-validated but could play an important role in diagnosing and monitoring SCAR. Several lines of evidence implicate granulysin as an important and detectable mediator of SJS/TEN.

### Conclusions or recommendations

The predictive value of any genomic biomarker depends on the frequencies of that marker and the associated ADR in the study population.<sup>[1]</sup> For this reason, further research is needed to identify genomic markers for particular demographic clusters in admixed populations that may have increased risk for developing certain ADRs.

Except for HLA-B\*1502/carbamazepine and HLA-B\*5801/allopurinol in some Asian populations, HLA testing has so far not been uniformly recommended in prescribing as a screen to identify patients in clinical practice for whom a drug is contraindicated.<sup>[2]</sup> Additional implementation studies will further characterize barriers to testing and find the best solutions, such as overcoming obstacles in information technology and infrastructure, translating raw genotyping lab results to actionable information to guide prescribing and improving HCP awareness and education. Circulating and tissue biomarkers that are able to detect SCAR should continue to be evaluated in clinical studies to better define their role in the management of SCAR.

It is critical to collect biospecimens from incident cases at various time points, and follow patients long-term to ascertain outcomes, so that biomarker discovery efforts can take advantage of more complete and comprehensive data to discover and validate biomarker-based approaches to guide care.

## 4.1. Introduction

SCAR such as SJS/TEN, and DRESS are associated with significant patient morbidity and mortality. These ADRs are the result of complex, heterogeneous, and distinct immunological responses following exposure to various medicinal products. Leveraging the knowledge of biomarkers to predict the risk of SCAR or its outcome can greatly improve the safe use of medications. A great deal of progress has been made in understanding the biological underpinnings of SJS/TEN and other forms of SCAR to enable the development of biomarkers that may be used across the continuum of patient care to mitigate risks and improve outcomes.

A biomarker is “a characteristic that is objectively measured as an indicator of normal biological processes, pathogenic processes, or biological responses to an exposure or intervention, including therapeutic interventions.” Biomarkers may include molecular, histologic, radiographic or physiologic characteristics.<sup>[3]</sup>

Safety biomarkers, a category of biomarkers, are “biomarkers measured before or after an exposure to a medical product or an environmental agent to indicate the likelihood, presence, or extent of toxicity as an adverse effect.”<sup>[3]</sup>

Safety biomarkers can be used to identify patients in whom initiation of a particular medicinal product may lead to significant risk of ADR, such as different HLA alleles or polymorphisms in medicinal product-metabolizing encoding genes;<sup>[4,5,6]</sup> when used in this way, this type of biomarker may also be referred to as a predictive biomarker. Safety biomarkers also may be used to detect or monitor ADRs (e.g. when tissue damage occurs, certain proteins may be detectable in the blood like transaminase elevations in the setting of liver injury); when used in this way this type of biomarker may also be referred to as a monitoring biomarker. In addition, biomarkers may be used as part of the diagnostic evaluation to confirm the presence of a particular ADR, and once diagnosed, to evaluate prognosis or the likelihood of a particular outcome. The functions of a biomarker are not mutually exclusive; a biomarker that is used for diagnosis may also predict response to certain therapies.

Overall, biomarkers can play a critical role in 1) identifying patient populations who are more likely to respond to medical treatments and those who are susceptible to ADRs, both of which are major goals of precision medicine, 2) enabling early diagnosis to distinguish SCAR from less critical conditions before significant damage occurs, and 3) characterizing the likely course of progression. Therefore, this chapter provides an overview of biomarkers for which the evidence suggests an important role predicting the risk of SCAR or enabling early diagnosis or monitoring, as well as some areas of continued biomarker development to maximize the benefits and reduce the risk of harm associated with administering medicinal products.

## 4.2. Human leukocyte antigen and immune-related genetic biomarkers

The most extensively studied biomarkers for SCAR risk are genetic variations in the human leukocyte antigen (HLA) system. The HLA system is a member of the MHC, a region of the human genome located on the short arm of chromosome 6p21.3. HLA is a highly polymorphic gene system and an important modulator for immune responses and hypersensitivity reactions to specific medicinal products. HLA antigens are expressed on the surface of many cells and play a major role in self-recognition, evoking the immune response to an antigenic stimulus and the orchestration of cellular and humoral immunity.<sup>[7]</sup>

Because HLA molecules need to present such a wide variety of “self” and “non-self” molecules, the HLA genes are both numerous and highly polymorphic. More than 9000 HLA-B alleles have been identified and could play a significant role in the pathogenesis of many immunologic ADRs.<sup>[8]</sup> For example, HLA-B variants have been associated with severe hypersensitivity reactions to abacavir, allopurinol, carbamazepine and phenytoin.<sup>[4,9,10]</sup> HLA-B molecules present endogenous or processed exogenous antigens to T cells, thereby eliciting an adaptive immune response. HLA restriction is required for the activation of medicinal product-specific T-cells by the culprit medicinal product.

The T-cell receptor of the effector T cell is thought to recognize the medicinal product-peptide complex bound by the specific HLA-B molecule on the antigen presenting cell, resulting in the release of immune mediators and leading to robust adaptive immune reactions such as SCAR.<sup>[11]</sup>

The relationships between different HLA alleles and the risk of medicinal product-induced SJS/TEN, DRESS and other skin reactions are well established and guidelines for genetic testing have been developed in some regions of the world with high frequencies of certain HLA alleles.<sup>[4,9,12,13]</sup>

The most widely reported HLA genotypes associated with SCARs include *HLA-B\*15:02* for carbamazepine and phenytoin (Han Chinese), *HLA-A\*31:01* for carbamazepine (Europeans and Koreans), *HLA-B\*58:01* for allopurinol (East Asians), *HLA-B\*59:01* for methazolamide (Koreans and Japanese), and *HLA-B\*13:01* for dapsone (Asians).<sup>[14,15]</sup>

### 4.2.1. Stevens-Johnson syndrome/toxic epidermal necrolysis

SJS/TEN in response to medicinal product exposure is the result of many genetic and non-genetic factors.<sup>[11]</sup> While the exact immunohistopathology of SJS/TEN is not fully understood, a variety of factors and characteristics are implicated. Medicinal product-specific CD8+ T cells and NK cells have been shown to be the major inducer of keratinocyte apoptosis. Specific T-cell receptors recognize a medicinal product (or its metabolites) presented by specific HLA alleles, which can lead to activation of medicinal product-induced cytotoxic T cells with release of multiple cytokines, chemokines, signals, and soluble cytotoxic mediators, such as Fas-Fas ligand, granulysin, perforin, granzyme B and tumour necrosis factor alpha (TNF- $\alpha$ ).<sup>[11]</sup> The IL15 cytokine, a major NK cell priming signal, passes through the JAK-STAT pathway with downstream effects on the PI3K/AKT/mTOR pathway and with effects on NK and CD8+ T cells, playing a vital role in most cellular processes, such as proliferation, adhesion, migration and invasion.<sup>[16,17]</sup>

Numerous studies have demonstrated a strong association between select HLA alleles and drug-induced SCAR.<sup>[18]</sup> A sampling of different alleles that have been identified as risk factors for SJS/TEN in different populations is summarized in Table 5.

**Table 5. HLA alleles associated with SJS/TEN**

Adapted from Gibson, et al. 2023<sup>[18]</sup>  
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| Medicinal Product | Risk alleles              | Populations Studied                                     |
|-------------------|---------------------------|---|
| Allopurinol       | A*33:02                   | Korean  |
|                   | B*58:01                   | European, Han Chinese, Korean, Vietnamese, Japanese     |
|                   | C*03:02                   | Korean  |
| Carbamazepine     | A*24:02                   | Han Chinese   |
|                   | A*31:01                   | European, Han Chinese, Korean                           |
|                   | B*15:02                   | Han Chinese, Korean, Indian, Malaysian, Thai, Taiwanese |
|                   | B*15:11                   | Han Chinese, Asian, Chinese                             |
|                   | B*15:21                   | Thai, Filipino  |
|                   | B*57:01                   | European  |
| Lamotrigine       | A*31:01                   | Korean  |
|                   | A*68:01                   | European  |
|                   | B*58:01                   | European  |
|                   | C*07:18, DQB1*06, DRB1*13 |   |
| Methazolamide     | B*55:02                   | Han Chinese   |
|                   | B*59:01                   | Han Chinese, Japanese, Korean                           |

| Medicinal Product | Risk alleles        | Populations Studied                      |
|-------------------|---------------------|--|
| Phenytoin         | B*13:01             | East Asian                               |
|                   | B*15:02             | East Asian, Han Chinese, Malaysian, Thai |
|                   | B*56:02             | Thai                                     |
|                   | B*15:13             | Malaysian                                |
|                   | Cw*08:01            | Han Chinese                              |
|                   | DRB1*1602           |  |
| Sulfamethoxazole  | A*29                | European                                 |
|                   | A*11:01             | Japanese                                 |
|                   | B*38                | European                                 |
|                   | B*44 (B12 serotype) | European                                 |
|                   | DR*07               | European                                 |

Chung, et al. were the first to identify an association between carbamazepine-induced SJS/TEN and HLA genetic polymorphisms, particularly the *HLA-B\*15:02* allele, in Han Chinese patients in Taiwan, with 100% sensitivity and 97% specificity.<sup>[19]</sup> This finding has been replicated in a large number of populations in Southeast Asia. Even though SJS/TEN is an infrequent AE, the risk is significant among carriers of the *HLA-B\*15:02* allele (OR 26.01; 95% CI 15.88–42.60;  $p < 0.00001$ ) in meta-analyses of data from different populations.<sup>[20]</sup>

While the incidence of SJS/TEN is lower in non-Asian populations, efforts have uncovered additional genetic variants that increase the risk for SJS/TEN in carbamazepine-treated patients. Specifically, *HLA-A\*31:01* was reported to be a significant risk factor in European populations, although the relative risk is much more modest than that observed for *HLA-B\*15:02*.<sup>[20]</sup> Several similar studies have also demonstrated that *HLA-B\*15:02* is also associated with a higher risk of SJS/TEN in patients treated with phenytoin. In addition, drugs that are structurally related to carbamazepine such as oxcarbazepine and eslicarbazepine also likely to carry the same risk, and experimental studies have identified structural elements that selectively interact with *HLA-B\*15:02*.<sup>[21]</sup> As such, many antiepileptics carry some shared HLA-related risk of developing SJS/TEN.

Collectively, these findings represent an opportunity for broader implementation of routine HLA genotyping in clinical practice. Following extensive replication of HLA alleles as a risk factor for SJS/TEN, certain geographical regions have implemented prospective genetic testing prior to administration of carbamazepine. A study including 23 hospitals in Taiwan demonstrated reductions in the incidence of carbamazepine induced SJS/TEN by screening patients for *HLA-B\*15:02* and avoidance of carbamazepine in *HLA-B\*15:02* carriers.<sup>[22]</sup> Unfortunately, the overall incidence of SJS/TEN was not reduced in part because of a shift to other drugs that also cause SJS/TEN.<sup>[23]</sup>

Allopurinol, a widely prescribed drug for the management of gout and hyperuricemia, is another major cause of SJS/TEN. Extensive studies have linked SJS/TEN induced by allopurinol to genetic polymorphisms in the HLA system, mainly *HLA-B\*58:01*.<sup>[24]</sup> For example, a study investigated the relationship between SJS/TEN and *HLA-B\*58:01* in a Thai population that has a high allelic frequency of this allele. Twenty-seven allopurinol-induced SJS/TEN and 54 allopurinol-tolerant patients were enrolled in the study. The presence of *HLA-B\*58:01* and HLA-B genotypes in these patients were analysed. All 27 (100%) allopurinol-induced SJS/TEN patients who were examined carried *HLA-B\*58:01* whereas only seven (12.96%) of the control patients had this allele. The risk of allopurinol-induced SJS/TEN was significantly greater in patients with *HLA-B\*58:01* when compared with those who did not carry this allele, with an odds ratio of 348.3 (95% confidence interval=19.26336.9,  $P = 1.6 \times 10^{-13}$ ). The sensitivity and specificity of the *HLA-B\*58:01* allele for prediction of allopurinol-induced SJS/TEN were 100% and 87%, respectively.<sup>[25]</sup>

This association however is less strong in Japanese where only 36–40% of allopurinol-induced SCAR patients are *HLA-B\*58:01* positive, or in European patients where only 55–64% of patients with SJS/TEN carry this allele. Although the frequency of *HLA-B\*58:01* in different populations varies significantly (up to 20% in Taiwan and less than 2% in Europeans), which consequently influences the frequency of SCAR in the different populations, ancestry also seems to have some influence on the capacity to develop this reaction.<sup>[23,26]</sup> The percent of *HLA-B\*58:01* negative individuals with allopurinol-induced SCAR is higher in Europeans and Japanese, suggesting other possible risk factors.<sup>[27]</sup>

To evaluate the use of prospective screening for the *HLA-B\*58:01* allele to identify Taiwanese individuals at risk of SCAR induced by allopurinol treatment, a national cohort study enrolled 2926 people who had an indication for allopurinol treatment but had not previously taken allopurinol.<sup>[28]</sup>

Participants who tested positive for *HLA-B\*58:01* (19.6%, n=571) were advised to avoid allopurinol and were referred to an alternate drug treatment or advised to continue with their study treatment. SCAR did not develop in any of the participants receiving allopurinol who screened negative for *HLA-B\*58:01*.<sup>[28]</sup> By contrast, seven cases of SCAR were expected, based on the estimated historical incidence of allopurinol-induced SCAR nationwide (0.30% per year, 95% confidence interval 0.28–0.31%;  $P=0.0026$ ).<sup>[28]</sup>

These results suggest that *HLA-B\*58:01* screening of about 110,000 new users of allopurinol in Taiwan each year could prevent about 330 cases of allopurinol-induced SCAR every year.<sup>[28]</sup> Prospective screening of the *HLA-B\*58:01* allele, coupled with an alternative medicinal product treatment for carriers, could significantly decrease the incidence of allopurinol-induced SCAR in high-risk patients.

From a pathophysiological standpoint, trigger medicinal products are thought to constitute the main target of the immune response. However, the strength of association between medicinal products and SJS/TEN is modulated by interindividual and interethnic variations in the HLA repertoire. The prevalence of ADR susceptibility genetic biomarker varies widely in different populations, impacting their clinical utility as predictive biomarkers for risk stratification and management. Variation in SCAR incidence and HLA allele frequencies can have a significant impact on the positive and negative predictive values of the test which will impact the number needed to screen to prevent an event.

For example, the higher frequency of the relatively penetrant *HLA-B\*1502* in certain Asian subpopulations, coupled with higher incidence of SJS/TEN, would suggest that a lower number need to screen to prevent a serious ADR-related event to carbamazepine compared with European and other populations, assuming a uniform effect of the *HLA-B\*1502* across all populations; the approximate number needed to test to prevent one SJS/TEN case based prospective studies in Taiwan is approximately 400.

Therefore, it could be logically and economically sound to screen certain populations where the predictive utility is greater. In addition, distinct HLA variants might segregate with different ancestral population groups, modulating the risk. Additional factors may promote altered medicinal product disposition and variably combine with HLA-related factors to contribute to SJS/TEN susceptibility.<sup>[29]</sup>

#### 4.2.2. Drug reaction with eosinophilia and systemic symptoms

In drug hypersensitivity, several models were proposed for recognition of the small drug compounds by T cells with subsequent initiation of the immune response. Traditionally, DRESS is classified as a type IVb reaction that corresponds with CD8+ and CD4+ T-cell responses underlying the production of interferon- $\gamma$ , IL-4, IL-5, and IL13, resulting in eosinophilia.<sup>[30]</sup> DRESS is a complex syndrome with a broad spectrum of clinical features.

As with SJS/TEN, several studies have been conducted to identify genetic susceptibilities to DRESS in various populations. *HLA-A\*31:01* has surfaced in a several studies of patients with Chinese, Japanese, European and North African ancestry as a risk factor for carbamazepine-induced DRESS. Other similar studies have been conducted to compare HLA allele frequencies in population or tolerant controls.<sup>[18]</sup>

Selected medicinal products where multiple loci have been identified are shown in Table 6.

**Table 6. HLA alleles associated with DRESS**

Adapted from Gibson, et al. 2023<sup>[18]</sup>  
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| Medicinal Product | Risk alleles              | Populations studied                  |
|-------------------|---------------------------|--------------------------------------|
| Allopurinol       | A*33:02                   | Korean                               |
|                   | B*58:01                   | European, Han Chinese, Korean, Thai, |
|                   | C*03:02                   | Korean, Vietnamese                   |
| Carbamazepine     | A*31:01                   | European, Han Chinese, Korean        |
|                   | B*15:11                   | Chinese                              |
|                   | B*58:01                   | Asian                                |
| Lamotrigine       | A*02:07                   | Thai                                 |
|                   | A*31:01                   | Korean                               |
|                   | A*68:01                   | European                             |
|                   | B*58:01                   | European                             |
|                   | C*07:18, DQB1*06, DRB1*13 |                                      |
| Nevirapine        | B*14:02                   | European (Sardinian)                 |
|                   | C*08                      | Japanese                             |
|                   | C*08:02                   | European (Sardinian)                 |
|                   | Cw4                       | Han Chinese                          |
|                   | DRB1*01:01                | European                             |
| Sulfamethoxazole  | A*11:01                   | Japanese                             |
|                   | B*13:01                   |                                      |

For vancomycin, a study was conducted through an EHR-connected biobank that was coupled with prospective case ascertainment, in which 23 cases of DRESS were compared to 46 matched, vancomycin-tolerant controls. *HLA-A\*32:01* was present in 83% of the cases and none of the controls ( $p=1 \times 10^{-8}$ ). In an enzyme linked immunosorbent spot (ELISpot) assay wherein case or control peripheral blood mononuclear cells were incubated with vancomycin showed that almost all ELISpot-positive cases carried *HLA-A\*32:01* (11/12, 92%) but none of 24 controls. In silico molecular docking analysis was used to evaluate interactions between *HLA-A\*32:01* and vancomycin, showing that vancomycin can potentially bind the antigen binding clef of this variant.<sup>[31]</sup>

### 4.2.3. Acute generalized exanthematous pustulosis

AGEP is a SCAR characterized by the acute onset of many pinpoint (< 5 mm), non-follicular sterile pustules scattered on edematous and erythematous skin.<sup>[32,33]</sup> The pathophysiology of AGEP has been classified as an immune T cell-mediated disease.<sup>[33]</sup> This immune process is initiated upon exposure to a culprit medicinal product, leading to formation of a medicinal product epitope by antigen presenting cells. This causes activation and proliferation of medicinal product-specific CD4+ and CD8+ T cells and the subsequent release of cytotoxic proteins such as perforin, granzyme B and Fas ligand.

These cytotoxic proteins induce apoptosis of keratinocytes in the epidermis, resulting in tissue destruction and vesical formation. The CD4+ T cells release an increasing amount of C-X-C motif chemokine ligand 8 (CXCL8), INF- $\gamma$ , and granulocyte/macrophage colony-stimulating factor (GM-CSF). CXCL8 is a potent neutrophilic chemotactic cytokine that recruits neutrophils into the vesicles and transforms the vesicles into sterile pustules. Increased levels of INF- $\gamma$  and GM-CSF synergistically enhances viability of neutrophils and amplifies formation of sterile pustules.

Very little information is available regarding clinical biomarkers for AGEP. A recent case series identified variants in the IL36 receptor antagonist (*IL36RN*) gene that may have potential significance in the pathogenesis of AGEP.<sup>[34]</sup>

IL-36 R blocks proinflammatory cytokines IL-36- $\alpha$ , - $\beta$  and - $\gamma$ . Variants in the *IL36RN* gene results in increased downstream production and release of these pro-inflammatory cytokines and chemokines such as IL-1, IL-6, IL-12, IL-23 and IL-17, leading to inflammation and potentially a predisposition to AGEP.<sup>[34]</sup> However, while psoriasis was not documented in any of the cases in this study, *IL36RN* variants are also present in generalized pustular psoriasis, which could potentially be a confounding factor.

## 4.3. Medicinal product metabolism-related genetic biomarkers

Polymorphisms in the genes encoding medicinal product-metabolizing enzymes or medicinal product-transporter proteins can significantly influence systemic concentrations of medicinal products, and for many medicinal products variability in systemic exposure can result in ADRs. To this end, the inter-individual variability in medicinal product metabolism and the formation of active metabolites could modulate this degree of engagement between the HLA-B molecule and T cells.

Cytochrome P450 (CYP) 2C9 (CYP2C9) is a drug metabolizing enzyme that is involved in the metabolism of numerous drugs, notably phenytoin. A genome-wide association study (GWAS) compared differences in the frequency of nearly one million variants in 48 SJS/TEN cases, 130 tolerant controls and 412 population controls from Taiwan. The investigators found that the *CYP2C9*\*3 variant, which results in an amino acid change (p.Ile359Leu) and decreases enzyme activity, was overrepresented in patients who received phenytoin and developed SJS/TEN compared to phenytoin-tolerant controls and population controls. A similar pattern was observed in an analysis of a small number of cases from Japan and Malaysia.<sup>[35]</sup> Additional studies confirmed this finding, and a subsequent meta-analysis has shown a significant association between phenytoin induced SJS/TEN and *CYP2C9*\*3, especially in the Thai population.<sup>[36]</sup> Phenytoin is primarily metabolized to an inactive metabolite by CYP2C9, and therefore, reduced CYP2C9 activity leads to higher systemic phenytoin concentrations, which may increase the risk of SCAR. Patients who are intermediate or poor metabolizers of CYP2C9 (e.g. have variant genotypes such as \*1/\*3, \*2/\*2 or \*3/\*3, which reduce CYP2C9 activity) exhibit higher plasma phenytoin concentrations compared to patients who are normal metabolizers (e.g. \*1/\*1).<sup>[10]</sup>

The GWAS also found that patients with SJS/TEN had higher phenytoin concentrations than tolerant controls. Thus, patients who are known to be intermediate or poor metabolizers may ultimately require lower doses of phenytoin to maintain similar steady-state concentrations compared to normal metabolizers, and higher concentrations may increase the risk for SCAR. DRESS is a severe T-cell-mediated hypersensitivity reaction to a medication or its active metabolites, which may be associated with enzymatic defects in drug metabolism.<sup>[37]</sup> Polymorphisms in genes encoding drug-metabolizing enzymes, such as CYP enzymes, N-acetyltransferase or drug transporter proteins have been associated with several ADRs and may possibly contribute to the pathogenesis of DRESS.<sup>[5,11]</sup> The GWAS that identified *CYP2C9\*3* as a significant risk factor for SJS/TEN also showed that DRESS risk was increased among *CYP2C9\*3* carriers.<sup>[38]</sup>

The precise mechanism by which *CYP2C9* variants increase SCAR risk in phenytoin treated patients is not established though it appears to be related to drug or metabolite concentrations. A study involving the immediate reactions to metamizole identified an association between the higher frequency of slow arylamine N-acetyltransferase type 2 activity (commonly referred to as slow acetylators) and the increased risk of agranulocytosis.<sup>[11,39]</sup> Impairment of these enzymes causes a reduced degradation of toxic metabolites such as 4-methylaminoantipyrine or 4-aminoantipyrine.<sup>[39]</sup> As such, other metabolic disturbances that result in the accumulation of immunogenic metabolites could be at play.

Other medications including aromatic anticonvulsants are metabolized by the hepatic CYP450 enzymes and oxidation by aromatic hydroxylase may produce the arene oxides, which are the toxic metabolites.<sup>[40]</sup> Overall, alteration in the activity of drug-metabolizing enzymes leads to the accumulation of toxic metabolites which dysregulate the immune response, stimulating cell necrosis and/or apoptosis.<sup>[11]</sup>

## 4.4. Circulating and tissue specific biomarkers to aid in the clinical evaluation of SCAR

Numerous studies have identified potential biomarkers in serum or skin (including blister fluid) that are diagnostic, prognostic or predictive. Granulysin has emerged as a biomarker that is present in various forms of SCAR. Granulysin is a cytotoxic molecule that is released from cytotoxic T lymphocytes and natural killer cells that plays a role in host defenses against pathogens. Granulysin is present in the blister fluid of patients with SJS/TEN and was shown to be toxic to keratinocytes.<sup>[41]</sup> Histopathology studies have also shown higher skin granulysin expression in various forms of SCAR, including SJS/TEN and DRESS,<sup>[42]</sup> and it is also found in the serum of patients with SJS/TEN, DRESS and other SCAR.<sup>[42,43]</sup> While granulysin appears to not be specific to SJS/TEN it could be an earlier indicator of SCAR.

Similarly, several studies have also shown that various other immune mediators such as soluble Fas ligand<sup>[44]</sup> granzyme B, and perforin<sup>[45]</sup> are also consistently elevated among patients with SCAR at various stages following clinical presentation. A body of literature is also available to suggest that various cytokines may be detected. However, the data for most biomarkers are less consistent with respect to correlations with disease severity and prognosis.

It is possible that multicomponent biomarkers could be developed to differentiate SCAR from less severe skin reactions, the likelihood of progression to TEN and potentially long-term outcomes.<sup>[46,47]</sup> Similar studies have also been conducted in DRESS. Biomarkers that have demonstrated promise include granulysin, TARC/CCL/17, soluble ST2, sOX40, CCL27, IL15, galectin-7, RIP-3, and a variety of cytokines, which have been measured in either serum or skin lesions, some of which appear to track with disease onset and severity.<sup>[30,46,47]</sup> A typical feature of DRESS is the reactivation of latent HHV, namely HHV6, HHV7, EBV, and CMV.

High viral load and antibody titres are considered poor prognostic markers in DRESS treatment outcomes.<sup>[11,48]</sup> DRESS is the result of complex interplay of genetic factors, especially HLA alleles, immunological response (T cell), and abnormality of medicinal product metabolizing enzymes and herpesviruses family member reactivation (HHV6, HHV7, EBV, CMV).<sup>[11,48]</sup> Nevertheless, clinical viral reactivation is a probable cause of chronic recurrence of DRESS-related skin rash despite cessation of the culprit medicinal product.<sup>[11,48]</sup>

## 4.5. Developing and implementing biomarker testing recommendations

Prescribing guidelines generated by different national and international working groups for translation of HLA-pharmacogenetic testing into clinical practice are operational in many countries. The Clinical Pharmacogenomics Implementation Consortium (CPIC)<sup>[49]</sup> and the Dutch Pharmacogenomics Working Group<sup>[50]</sup> have written prescribing guidelines based on HLA genotype for carbamazepine,<sup>[51,52]</sup> oxcarbazepine,<sup>[51,52]</sup> phenytoin,<sup>[10]</sup> allopurinol,<sup>[4,53]</sup> flucloxacillin<sup>[52]</sup> and lamotrigine.<sup>[52]</sup> Genetic testing coupled with a robust clinical decision support system may enable clinicians to optimize medicinal product selection.

To this end, these genotype-based treatment guidelines may help to facilitate the use of pharmacogenetic tests for patient care and resources such as PharmGKB, which curate and annotate clinical guidelines, could aid healthcare professionals in implementation.<sup>[49]</sup> Some regions have had success with implementation of screening such as Taiwan.<sup>[54]</sup>

However, testing is not routine in many parts of the world primarily because of the rarity of SCAR and because of reimbursement/payment policies. In regions where the incidence is lower, testing may be targeted to certain subsets of patients in which the risk for the ADR is higher. An example of this is seen for carbamazepine where regulatory authorities have incorporated testing recommendations in medicinal product labelling for patients of Asian ancestry:

### **Novartis Pharmaceuticals. “Tegretol (Package Insert).” (2023)**

#### **Carbamazepine Boxed Warning (U.S. Prescribing Information):**

*SERIOUS AND SOMETIMES FATAL DERMATOLOGIC REACTIONS, INCLUDING TOXIC EPIDERMAL NECROLYSIS (TEN) AND STEVENS-JOHNSON SYNDROME (SS), HAVE BEEN REPORTED DURING TREATMENT WITH [CARBAMAZEPINE]. THESE REACTIONS ARE ESTIMATED TO OCCUR IN 1 TO 6 PER 10,000 NEW USERS IN COUNTRIES WITH MAINLY CAUCASIAN POPULATIONS, BUT THE RISK IN SOME ASIAN COUNTRIES IS ESTIMATED TO BE ABOUT 10 TIMES HIGHER. STUDIES IN PATIENTS OF CHINESE ANCESTRY HAVE FOUND A STRONG ASSOCIATION BETWEEN THE RISK OF DEVELOPING SJS/TEN AND THE PRESENCE OF HLA-B\*1502, AN INHERITED ALLELIC VARIANT OF THE HLA-B GENE. HLA-B\*1502 IS FOUND ALMOST EXCLUSIVELY IN PATIENTS WITH ANCESTRY ACROSS BROAD AREAS OF ASIA. PATIENTS WITH ANCESTRY IN GENETICALLY AT-RISK POPULATIONS SHOULD BE SCREENED FOR THE PRESENCE OF HLA-B\*1502 PRIOR TO INITIATING TREATMENT WITH [CARBAMAZEPINE]. PATIENTS TESTING POSITIVE FOR THE ALLELE SHOULD NOT BE TREATED WITH [CARBAMAZEPINE] UNLESS THE BENEFIT CLEARLY OUTWEIGHS THE RISK (SEE WARNINGS AND PRECAUTIONS, LABORATORY TESTS).*

Ancestry has been recognized as a major factor contributing to interindividual variability in SCAR. For example, abacavir-hypersensitivity syndrome is more prevalent in white populations due to a higher frequency of the *HLA-B\*57:01* allele in this population, whereas the frequency of carriers of the *HLA-B\*58:01* allele is higher in Asian populations.<sup>[55,56,57]</sup> The predictive value of any biomarker

depends on the frequencies of that marker and the associated ADR in the study population.<sup>[56]</sup> For this reason, further research is needed to identify genomic markers for particular demographic clusters in admixed populations that may have increased risk for developing certain ADRs.

Regardless of the approach, biomarker testing recommendations from regulatory authorities or developers of clinical guidelines have to consider many factors including:

1. the extent of evidence to support the association and information on the relevant population, because the rarity of the events makes populations studies difficult to conduct so experimental evidence and replication of findings is critical;
  2. allele distributions for genetic factors because the frequency of variants that increase risk may vary widely based on ancestry;
  3. screening considerations because the rarity of events tends to make the yield of screening quite low so identification of multiple factors that increase risk can help make testing more efficient;
  4. clinical recommendations to guide prescribing because the potential benefits and risks of alternative treatment strategies may influence outcomes;
  5. uncertainty and limitations because any predictor of SJS/TEN or other SCAR is likely to be imperfect and patients may remain at risk despite having negative test results, and
- 6) risks of alternative therapies because some risk factors are shared across drugs.<sup>[58,59]</sup>

Application of HLA genotyping as a screening tool has limitations and should never be a substitute for appropriate clinical vigilance and individualized patient management. In addition, in considering the utility of a predictive biomarker for health outcomes, it is important to consider clinical performance characteristics. For rare adverse events such as SJS/TEN and other SCAR, the adverse event rate in the population is generally low. Testing for factors that are prevalent in the population, such as a common genetic characteristic, to predict a rare adverse event will naturally have a low positive predictive value and a high negative predictive value.

Thus, the numbers needed to screen to prevent an adverse event (akin to number needed to treat), will often be higher than other commonly used tests. Furthermore, for many of the pharmacogenetic interactions described above, some patients who test positive may not go on to experience SCAR and, likewise, patients who test negative may as well. Few tests perfectly predict clinical outcomes, and clinicians should diligently monitor patients for development of hypersensitivity reactions, regardless of the absence or presence of a biomarker associated with the ADR.

## 4.6. Future directions

While progress has been made in identifying common predictive and prognostic genomic biomarkers of ADRs, only a small number have been translated to clinical practice. With the increasing use of genetic sequencing technologies, greater focus is being placed on the role of rare variants in ADR predisposition. Although there remain substantial barriers for the clinical translation of genomic biomarkers in clinical practice, it is conceivable that in the not-too-distant future next generation sequencing of the entire genome will be performed in some healthcare systems.

As such, DNA sequence results will be readily available when needed to support medical decision making. To this extent, HLA allele status will be retrievable and could replace the need for later ad hoc screening. Similarly, testing of protein biomarkers needs a strong foundation of access to reliable tests with rapid turnaround to facilitate broader use in practice.

Future research is needed to develop and validate both existing and novel biomarkers. Expanding the catalogue of different pharmacogenetic variants will emerge as the genetic research landscape becomes more diverse. By increasing the diversity of population groups in ADR-related research, the potential to identify population-specific genomic biomarkers to predict an ADR in individuals is increased.

As is the case for SCAR-associated risk alleles, which can exist at a lower frequency in the population, diversity in genetic research can drive the collective effort to ascertain the polygenic nature of developing ADR as well as non-genetic factors that could contribute to overall risk of ADR. Much of this research is unlikely to be performed in the pre-market medicinal product development setting for new medicinal products because the incidence of such adverse events is so rare and unlikely to be detected. As such, population resources such as biobanks linked to electronic health records will be critical in advancing the discovery of new variants that predispose individuals to SCAR.<sup>[60]</sup> Beyond genomics, research priorities include creation of infrastructure to capture other tissue biospecimens from cases early in the course of their illness to develop better diagnostic and monitoring biomarkers.<sup>[61]</sup> The evidence base for other circulating and tissue biomarkers has not yet reached a level to support routine clinical testing yet remain an area of ongoing research.

Lastly, other factors can contribute to the risk for development of an ADR, such as medicinal product dose and duration, concomitant medications and the risk for drug-drug interactions, comorbidities, age and environmental factors. Therefore, clinicians should consider the totality of information and manage each patient individually. For diagnosis or prognosis, attention should be paid to the use of multiple biomarkers in combination with other clinical information, to increase information value, with a view to performing prognostic research that is clinically informative.

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# CHAPTER 5.

## CAUSALITY ASSESSMENT OF SCAR IN PRE- AND POST-AUTHORIZATION SURVEILLANCE

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### Chapter summary

Causality assessment is the process by which the relationship between a medicinal product and AE is evaluated. Standard methods such as Bradford Hill criteria, global introspection, operational algorithms, probabilistic approaches are described for SCAR. Adjudication, targeted follow-up forms and assessment of aggregate data are also presented.

### Conclusions or recommendations

- ▶ The standard causality methods may be used to evaluate a potential causal relationship between a product and adverse skin events.
- ▶ The Algorithm for Assessment of Drug Causality for Epidermal Necrolysis (ALDEN) was created to assess causality of individual reports of SJS/TEN takes into account the most relevant factors such as latency and medicinal product half-life, class effect and alternative etiologies.
- ▶ When possible, additional tools such as patch testing or delayed intradermal testing and expert adjudication of individual cases can further support a causal relationship.
- ▶ SCAR-specific targeted questionnaires may offer valuable information for a timely and comprehensive assessment of causality.

## 5.1. Introduction

Causality assessment is a process whose purpose is to determine the relationship between an intervention, namely a medicinal product, and an AE and includes a causality assessment at both the case level and medicinal product level. If a causal relationship with the AE is considered at least a reasonable possibility, the event is considered an ADR. The assessment of causality is at the heart of pharmacovigilance, which relies on the information collected from diverse sources and may include pre-clinical data, clinical trials, epidemiologic studies, utilization data and post-authorization case reports. For rare events such as SCAR, post-authorization cases from HCPs and patients may serve as a critical data source to support updating labelling language to include the risk of SCAR with an approved medicinal product.<sup>[1]</sup>

Once a SCAR diagnosis is confirmed, a detailed medical history including all medicinal products and/or supplements will inform the assessment of a causal relationship between the AE and the medicinal product. In general, it is recommended to conduct a review of medical events and exposures, including dates and timelines over an eight-week period prior to the reported onset of the SCAR<sup>[2]</sup> and the patient's skin risk profile.<sup>[3]</sup>

In certain circumstances, it may be useful to consider medicinal product exposure over a longer timeline, taking into account factors such as treatment indication, patient population characteristics, and medicinal product mechanism of action. Validated medicinal product causality assessment tools

also help to avoid implicating the medicinal product(s) introduced for early symptoms of SCAR and are discussed in this chapter. In the pre-authorization phase, clinical trial participants benefit from close safety surveillance and any suspected ADR will be investigated, which will include a causality assessment of the individual case.

In the post-authorization phase, patients and HCPs are encouraged to report suspected ADRs to their regional reporting schemes. Also, it is important to note that individuals submitting the report are not required to make a causality assessment of the individual cases. Solicited reports may require the manufacturer to make an assessment for causality in some regions. When a suspected ADR is reported by an HCP or patient, the manufacturer may perform a causality assessment of that reaction. The assessment outcome can be part of this submission to enable regulatory agencies to confirm/evaluate the diagnosis, causality, severity, and course, based on the provided information (see also [Table 7. Initial assessment of potential scar in the clinical trial setting](#)). Manufacturers and regulatory bodies are required to perform continuous safety surveillance in the post-authorization phase based on the totality of all available evidence.

Such surveillance involves assessment of causality for individual cases based on available information. Whereas causality assessment at case level investigates if an AE was caused by a medicinal product in the patient, it also examines whether the medicinal product can cause the AE in patients who will receive the medicinal product in the future. Approaches for causality assessment on the basis of all evidence are also discussed in this chapter.

## 5.2. Global introspection methods

Global introspection methods rely on detailed clinical information for individual cases of suspected ADRs. The WHO-UMC for International Drug Monitoring has developed a practical tool which combines the assessment of clinical and pharmacological case information and the quality of this information to assess causality. The WHO/UMC causality tool takes into account the temporal relationship, laboratory values, dechallenge and rechallenge outcomes, as well as the presence of possible alternative etiologies to classify the likelihood of a causal relationship of a given case into Certain, Probable/Likely, Possible, Unlikely, Conditional/Unclassified, and Unassessable/Unclassifiable.<sup>[4]</sup> The global introspection method implicitly relates to the diagnosis-making process which remains subjective and demonstrated poor intra- and interrater reproducibility.<sup>[5,6,7,8]</sup>

### 5.2.1. Operational algorithms

The second category of causality assessment methods consists of questionnaire-based operational algorithms for individual cases of suspected ADRs.<sup>[6]</sup> Algorithms are designed to reduce intra- and interrater variability, increase reliability and validity of causality assessment. The **Naranjo scale** is the commonly used algorithm to assign a probability scale to medicinal product-event relationship.<sup>[9]</sup> It was originally developed by pharmacologists/physicians and psychiatrists at the University of Toronto for use in controlled trials and registration studies of new drugs.<sup>[9,10]</sup> The Naranjo approach is simple to apply in the assessment of causality of individual case reports from spontaneous post-authorization reporting,<sup>[11]</sup> or observational studies.<sup>[12,13]</sup> The Naranjo scale can be used for assessment of adverse skin events.<sup>[14]</sup> However, the high variability of weighting assigned to each causality criterion can lead to the imprecise expression of the final result.<sup>[15]</sup> Slight variations of the Naranjo scale, such as the **Liverpool algorithm**, have been shown to reduce interrater variability.<sup>[16]</sup>

### 5.2.2. Probabilistic methods

Probabilistic methods calculate the probability of causality based on available knowledge of the type of suspect medicinal product, its potential to cause a specific ADR (prior estimate) and specific findings in individual case reports of suspected ADRs, in combination with background information (posterior estimate).<sup>[9]</sup> The probabilistic approach derived from Bayes' theorem, offers a formal causal assessment in determining the probability of medicinal product causation. While highly reliable, these methods remain too complex and time consuming for routine practice.<sup>[8,17]</sup>

These tools are not specific to an ADR and can be further refined to the type of medicinal product-induced injury such as the Roussel Uclaf Causality Assessment Method for drug-induced liver injury<sup>[18]</sup> or the Algorithm for Assessment of Drug Causality for Epidermal Necrolysis (ALDEN) that is specific to cases of SJS/TEN.<sup>[19]</sup>

#### 5.2.2.1. ALDEN

ALDEN is a probabilistic method aimed at assessing the causality of individual cases of SJS/TEN. ALDEN was developed for use in case-control studies (SCAR and EuroSCAR)<sup>[20,21]</sup> and a case registry (RegiSCAR).

The ALDEN score also takes into account the latency between start of medicinal product intake and index day (day of SJS/TEN symptom onset), presence/availability of the medicinal product in the body before index day (taking into account the medicinal product's half-life and the patient's hepatic and renal function), information on previous and later intake as well as the discontinuation of the medicinal product (if available), type of medicinal product and its possible induction potential (based on medicinal product lists that have to be updated regularly), and alternative reasons.

The ALDEN criteria includes a criterion on medicinal product "notoriety" for SJS/TEN assigning no points for medicinal products not previously identified as culprits, "including those newly released to the market"<sup>[19]</sup> and thus a new culprit medicinal product would not contribute to the total score and causality classification. Numeric score values allow the causality assessment of every single medicinal product a patient used four weeks before the SJS/TEN. The numeric score values are classified as "very improbable", "improbable", "possible", "probable", or "very probable". Given that ALDEN is more sensitive than global introspection or operational algorithms, it can be considered a reference tool in SJS/TEN.<sup>[19]</sup>

### 5.2.3. The Bradford Hill criteria

The Bradford Hill criteria consist of nine principles that can be useful in establishing a causal relationship between an observation at population level and a suspected cause based on all available evidence. These criteria have been widely used in epidemiology and public health research and include the strength in terms of effect size, consistency across clinical findings, specificity, temporal sequence, biological gradient in terms of dose-response relationship, biologic plausibility, coherence with non-clinical findings, experimental evidence and analogous evidence.<sup>[22]</sup>

In pharmacovigilance, the Bradford Hill criteria are considered relevant for causality assessment<sup>[22]</sup> and have become the basis for several methods, which have five criteria in common: challenge, dechallenge, rechallenge, previous bibliographic description and etiologic alternatives.<sup>[22]</sup>

## 5.3. Tools to support investigation of causality between medicinal product and SCAR

### 5.3.1. Tests

Patch or delayed intradermal testing provide evidence to support the assessment of causality. In general, diagnostic patch testing (DPT) is performed after but within one year of the acute phase of the hypersensitivity reaction.

DPT is generally safe but has been associated with a high incidence of non-life-threatening systemic reactions among HIV-infected patients with antituberculosis drug-related cADRs, including SJS/TEN.<sup>[23,24]</sup> For SJS/TEN, the optimum time for a diagnostic rechallenge is during the acute stage.

In DRESS, which formed the majority of cases, it should be performed 5-8 weeks after the initial cADR. Other authors have suggested that rechallenge following cADR should be deferred by a period equivalent to over five times the elimination half-life of the drug and not earlier than four weeks after the episode. This could be related to transient, nonspecific residual reactivity to drugs often induced by persisting viral or immune reactivation during the acute stage, causing high background proliferation and activity, regardless of stimulus.<sup>[23,24]</sup>

These tests are of particular interest when several medicinal products are co-administered and/or to clarify the phenotype.<sup>[25]</sup> For abacavir, DPT has helped define the phenotype of immunologically-mediated abacavir hypersensitivity with a diagnostic sensitivity of 87%.<sup>[26,27,28]</sup> The in vivo skin testing has shown a negative predictive value (NPV) of approximately 90% for skin reactions depending on the drug tested. The negative results may support a rechallenge in the absence of safe, alternative treatments.<sup>[29]</sup>

DPT has also been used to investigate the cross-reactivity to anti-epileptic agents that are considered as therapeutic alternatives.<sup>[30]</sup> A large multi-centre study showed a high degree of variability of the DPT results in both drug and clinical phenotype in patients diagnosed with DRESS, AGEP or SJS/TEN within one year of event resolution.<sup>[31]</sup>

In vitro testing, such as lymphocyte proliferation assays and those to identify and characterize drug-specific immune cell populations or key cytokines involved in skin reactions are still under development and are not used for routine diagnostic testing.<sup>[32,33]</sup> HLA pharmacogenomic testing can be used in a clinical setting to identify if patients are at risk for SCAR.<sup>[34]</sup>

### 5.3.2. Adjudication

#### 5.3.2.1. Independent clinical trial review board

Event adjudication is a process where an independent review board of medical specialists assesses relevant events for fulfilment of predefined clinical criteria. It is used in clinical trials to manage subjective evaluations and enhance a harmonized approach.

The adjudicator refers to one or more assessors, independent from site investigators, who use information collected in the trial to assess the same outcome. In order for relevant information to be captured when there is a suspicion of SCAR in a clinical trial, AE-specific follow-up forms are developed by sponsors and submitted to investigators for completion. This allows the creation of a standardized process for the assessment of AE reports and enhanced case documentation to support appropriate diagnosis and causality assessment.

Considering the low frequency of SCAR, a panel of independent experts is rare. More often, independent dermatology experts are involved to review and assess an adverse skin event that is considered a potential SCAR. Inclusion of a blinded independent dermatologist or allergist is considered a strength when planning for clinical trials where suspected SCAR are foreseen, as it allows for accurate monitoring and assessment of adverse skin events.<sup>[35]</sup>

### 5.3.2.2. Other clinical tools

In addition to an independent expert assessment in cADRs, integration of standardized skin biopsy results, photographs and investigator trainings and materials may allow for more accurate monitoring and evaluation of adverse skin events.<sup>[35]</sup>

### 5.3.3. Targeted follow-up forms

Targeted Follow-up Forms can be used to document relevant information that will allow appropriate SCAR assessment. Certain limitations and difficulties are acknowledged when collecting the information proposed on the follow-up forms, such as the paucity of biopsies typically performed on cutaneous lesions, incomplete information obtained from the reporter on the characteristics of cutaneous lesions or absence (or insufficient quality) of photographs of cutaneous lesions under standardized conditions. In addition, there is the potential for missing data entry (e.g. subjects who withdraw from studies, lack of follow-up in the post-authorization period).

Important elements to be captured on the follow-up forms may include medical history/risk factors, AE information (e.g. nature of first symptoms, type of cutaneous event, extent of a rash/distribution of cutaneous lesions, associated symptoms, evidence of internal organ involvement), evidence of viral infection, whether photosensitivity is suspected, whether photographs were taken, if the medicinal product was stopped or dosage reduced and the outcome of the event.

## 5.4. Causality within SCAR pharmacovigilance

A systematic approach for assessment of the SCAR signal is key to complement the adjudication process. This topic is further discussed in [Chapter 6](#). Scientific adjudication is required to assess the causal relationship between the suspect medicinal product and SCAR.

This approach includes the following steps:

- ▶ Case definition, described in more detail in [Chapter 1](#),
- ▶ Pattern analysis: evaluating the number of cases with a compatible chronology, cases without a suggestive chronology, cases with no chronology available and cases where the diagnosis of SCAR was not confirmed. In addition, evaluating the number of cases with concomitant exposure to medicinal products known to induce SCAR and/or with possible underlying conditions that may provide alternative explanations (e.g. infections, systemic lupus erythematosus [SLE], T-cell lymphoma),
- ▶ Literature review: to evaluate whether there are cases of SCAR reported with the suspect medicinal product or within the product class in key epidemiological studies on SJS/TEN (e.g. EuroSCAR).

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# CHAPTER 6.

## PRE-AUTHORIZATION SAFETY DATA COLLECTION AND ANALYSIS

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### Chapter summary

This chapter provides guidance to investigators about the information to be collected during the initial assessment of a potential SCAR. The chapter also addresses the risk factors associated with the development of SCAR and contains an overview of differential diagnoses that may present with SCAR-like manifestations.

Subsections contained in this chapter:

- ▶ Investigator assessment,
- ▶ Risk factors and differential diagnoses for SCAR.

### Conclusions or recommendations

When appropriate assessment of a SCAR during clinical development has been conducted, communicating the SCAR to various stakeholders in the clinical trials is important. Timely awareness by stakeholders, including study participants, investigators and regulatory authorities, is necessary to allow prompt identification of these events and rapid intervention, thereby ensuring patient safety. Additionally, sponsors of a clinical trial where a SCAR has been reported may consider implementing protocol changes to allow for continued monitoring and additional characterization of a potential SCAR.

## 6.1. Introduction

Timely recognition of a potential SCAR case by investigators is of utmost importance for patients' safety and assessing the impact of such a reaction on the clinical programme. Initial steps in this assessment require the acquisition of detailed information about the suspected AE that could suggest and confirm a SCAR diagnosis.

## 6.2. Investigator assessment

SCAR needs to be promptly recognized because of the associated high morbidity and mortality as well as the potential impact on a clinical programme. A clinical trial participant presenting with a widespread rash temporally associated with a suspect medicinal product should trigger an evaluation of a possible SCAR case.

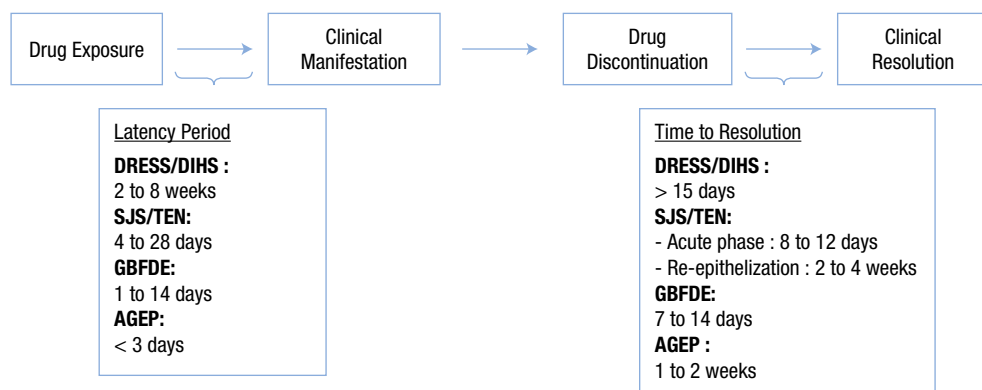
Clinical trials whose patient population include high-risk patients for the occurrence of SCAR (e.g. HIV-infected patients, oncology patients, patients with SLE)<sup>[1]</sup> and/or exposure to medicinal products (either as an investigational medicinal product or concomitant medication) with a known risk of inducing SCAR (e.g. aromatic anticonvulsants, allopurinol, antiretrovirals, oxicams) should lead the sponsor and investigators to consider the occurrence of possible SCAR. Additionally, investigators overseeing clinical trials whose population is comprised of elderly patients should keep in mind that

prompt diagnosis is of utmost importance, since higher mortality rates and clinical complications are more frequently observed in older patients.<sup>[2,3,4]</sup>

In the event of a suspected SCAR, the first measure should be to interrupt the treatment with the suspect medicinal product. In case a specific medicinal product cannot be identified as a suspect, discontinuation of any non-essential medicinal products or alternative medicines, e.g. herbal agents, should be considered. An assessment of the likelihood that the investigational medicinal product is implicated is required, taking into consideration two main points, namely the information that is available on other medicinal products within the same class and that elicit similar reactions, and time to onset of the reaction. Additional challenges may exist when medicinal products are co-administered, e.g. chemotherapy. Furthermore, all concomitant medications need to be evaluated and, once a particular SCAR diagnosis is suspected (e.g. DRESS, SJS/TEN), the typical latency period should be compared with the time elapsed since last exposure to the suspect medicinal product.(Figure 7.)

### Figure 7. The SCAR timeline

References: [5,7,9,11,28]



The pattern of skin involvement and accompanying signs/symptoms can suggest SCAR and certain characteristics might suggest a particular diagnosis. SJS/TEN may present with blisters, skin detachment, exfoliation, positive Nikolsky's sign, oral and genital mucosa involvement, as well as eye involvement (e.g. corneal ulcers, conjunctivitis). The occurrence of a prodromal period is common with SJS/TEN, usually preceding skin manifestations by three days and presenting with fever, myalgia, arthralgia, malaise, photophobia or conjunctival itching or burning.

In DRESS/DIHS, fever, facial oedema and lymph node enlargement are typically present. In addition, a long latency period is typically observed (2-8 weeks) and the clinical resolution usually follows a protracted course (> 15 days).<sup>[6,7]</sup> In a clinical trial setting, a patient with characteristic lesions and systemic symptoms should be evaluated for exposures to new medicinal products, recent dosage changes or use of known high-risk medicinal products, which occurred 2-8 weeks prior to the onset of lesions or systemic symptoms. The investigational medicinal product should also be assessed for a possible contributing role. It is noteworthy to mention that several recently developed medicinal products have been reported as DRESS/DIHS syndrome culprits, such as anti-hepatitis C virus agents (boceprevir and telaprevir), targeted therapies for oncological diseases (sorafenib, vismodegib and vemurafenib), rivaroxaban and febusostat.<sup>[7]</sup> The diagnosis of DRESS/DIHS should be guided by a scoring system, such as RegiSCAR and J-SCAR,<sup>[6,8]</sup> to the extent that clinical and laboratory information is available.

FDE is characterized by the occurrence of erythematous macules/plaques, residual hyperpigmentation, and a history of recurring lesions in the same affected area, after exposure to various medicinal products (NSAIDs, paracetamol/acetaminophen, antibiotics). GBFDE is a rare and more severe form of FDE, presenting with blisters and is clinically similar in appearance to SJS/TEN. The absence of constitutional symptom and internal organ involvement, presence of well-demarcated blisters and erythematous patches, absence or paucity of mucosal erosions, a history of similar eruptions and onset within hours of exposure to the associated medicinal product favour a GBFDE diagnosis.<sup>[4]</sup>

In a 2013 study, Lipowicz et al. compared GBFDE cases with SJS/TEN cases and found that although the majority of patients with GBFDE had skin detachment of less than 10% of BSA (30/58 patients), the mortality rate was significant and comparable to SJS/TEN (22% versus 28%). The most characteristic feature of AGEP is the presence of widespread sterile pustules, with an initial predilection for flexural areas and subsequent spread to trunk and limbs. Systemic manifestations and laboratory abnormalities can also occur, such as fever, leukocytosis, neutrophilia and eosinophilia,<sup>[9]</sup> as well as mucous membrane involvement in about 20% of the cases (typically limited to oral mucosa).<sup>[10]</sup> A rapid onset (hours to a few days) after medicinal product exposure is also observed and can help differentiate from other SCAR.

In all potential SCAR, because appropriate diagnosis considers clinical, histopathologic and laboratory features, a specialist in the management of medicinal product-induced cutaneous lesions should be consulted, such as a dermatologist, allergist or other subject matter expert. A skin biopsy for histopathologic examination may provide useful information for the assessment of the event as well as key information to help distinguish between different SCAR entities (e.g. SJS/TEN versus GBFDE) and other conditions in the SCAR differential (e.g. autoimmune blistering diseases).<sup>[11]</sup>

Table 7 provides recommended information to be collected by the investigator in case a SCAR diagnosis is suspected. This information may help to confirm the diagnosis and inform causality assessment.

**Table 7. Initial assessment of potential scar in the clinical trial setting**

|                                   |  |
|-----------------------------------|--|
| Medicinal product characteristics | <ul style="list-style-type: none"> <li>▶ Published evidence including notoriety for the known medicinal product: e.g. aromatic anticonvulsants, sulfonamides, oxicam NSAIDs</li> <li>▶ For medicinal products under investigation, potential pharmacodynamic interactions such as chemical structure, metabolites or mechanisms of action should be considered</li> </ul>  |
| Patient characteristics           | <ul style="list-style-type: none"> <li>▶ Demographics: age, gender, genetic background</li> <li>▶ Patients with HIV infection, malignancies, SLE or other autoimmune diseases, transplant patients.</li> <li>▶ Genetic risk factors: presence of medicinal product-specific HLA risk alleles and known exposure to certain agents (e.g. DIHS/DRESS/SJS/TEN induced by dapsone and <i>HLA-B*13:01</i>,<sup>[12]</sup> SJS/TEN induced by carbamazepine and <i>HLA-B*15:02</i>,<sup>[13]</sup> DIHS/DRESS/SJS/TEN induced by allopurinol and <i>HLA-B*58:01</i><sup>[12]</sup>)</li> </ul> |

|  |  |
|--|--|
| Skin involvement characteristics                             | <ul style="list-style-type: none"> <li>▶ Time to onset of cutaneous lesion</li> <li>▶ Time to resolution of the event, if reaction is resolved</li> <li>▶ Description of rash, distribution, location and morphology of cutaneous lesions (e.g. presence of papules, macular papules, exanthema, pustules, urticaria, blisters, bullae, exfoliation, oedematous plaques, hyperpigmentation, target-like lesions, positive Nikolsky's sign)</li> <li>▶ Approximate body surface area affected: &lt; 10%, 10-30%, &gt; 30%</li> <li>▶ History of recurring skin lesions at the same site (GBFDE)</li> <li>▶ Biopsy and immunofluorescence results, if available Patch testing, prick testing, lymphocyte stimulation testing, immunophenotyping or HLA genotyping, if available</li> </ul> |
| Presence of accompanying and/or preceding signs and symptoms | <ul style="list-style-type: none"> <li>▶ Presence of oral or genital mucosa involvement</li> <li>▶ Fever (body temperature &gt; 38 °C)</li> <li>▶ Other constitutional signs/symptoms: fatigue, arthralgia</li> <li>▶ Enlarged lymph nodes (DRESS/DHS)</li> <li>▶ Facial oedema (DRESS/DIHS)</li> <li>▶ Eye involvement (conjunctivitis, corneal ulcer), (SJS/TEN)</li> </ul>  |
| Presence of Accompanying Laboratory Abnormalities            | <ul style="list-style-type: none"> <li>▶ Leukocytosis</li> <li>▶ Lymphocytosis</li> <li>▶ Lymphopenia</li> <li>▶ Presence of atypical lymphocytes (DRESS/DIHS)</li> <li>▶ Eosinophilia</li> <li>▶ Thrombocytopenia (DRESS/DIHS)</li> <li>▶ Evidence of internal organ involvement (DRESS/DIHS): AST and/or ALT increase, creatinine increase, proteinuria, haematuria, decreased creatinine clearance, cardiac enzymes elevation, amylase and/or lipase increase.</li> <li>▶ Evidence of reactivation of herpes viruses (HHV6 - DRESS/DIHS)</li> </ul>   |

In addition, the investigator can consider assigning the SCAR a severity grade (e.g., mild, moderate, severe) or a severity grading may be required under a study protocol. Of note, the Common Terminology Criteria for Adverse Events includes pre-specified clinical descriptors for severity grading for SJS and TEN as well as other conditions such eosinophilia.<sup>[14]</sup> A severity grade describes the specific ADR while an assessment of seriousness captures the outcome of the ADR, which is defined by international guidelines.<sup>[15,16]</sup>

## 6.3. Risk factors and differential diagnoses for SCAR

### 6.3.1. Risk factors

The process for monitoring and identifying potential SCAR cases during pre-authorization clinical development and post-authorization depends on the predilection of the medicinal product association with SCAR. The following paragraphs will briefly cover several risk factors that should be considered: patient population (age, comorbidities, genetic background), pharmacology (class and target) of the medicinal product, and pharmacogenomics, when assessing the risk for SCAR in a clinical programme.

If the risk for SCAR is increased, SCAR may be considered an Adverse Event of Special Interest (AESI) in a clinical programme, and an adjudication procedure for cutaneous AE may be installed.

### Patient population

Patient population characteristics including age, comorbidities and genetic background must be considered when determining SCAR risk for the patient and/or patient population. It is uncommon for SJS/TEN to occur in children less than two years of age<sup>[17]</sup>. Singh et al. published a retrospective study<sup>[18]</sup> evaluating EHRs of a tertiary hospital in Northern India, in which the majority of SCAR occurred in the older age group (41-65 years old).

Replotting the data in Table 8 shows that approximately 50% (42-59%) of each SCAR (SJS/TEN, DRESS and AGEP) and exfoliative dermatitis (ExDerm) occurred in the 41–65 year-old age group and that the youngest age group (0-18 years old) consistently represented the lowest proportion for each SCAR.

In addition to the age of the individual, comorbidities are important risk factors for SCAR. SCAR tend to be more common in immunocompromised patients such as individuals with HIV infection, as well as individuals with malignancy or hepatic disease.<sup>[19,20]</sup> To understand the comorbidity impact on SCAR risk, Table 9 replots the data from Singh et al. Acute infections were found to be the most common comorbidities for SJS/TEN and DRESS, while seizure disorder and diabetes were the most common comorbidities for AGEP and ExDerm.

Specific genetic associations and HLA alleles may be over or under expressed in different patient populations (Table 10).<sup>[9]</sup> The linkage between abacavir hypersensitivity and *HLA B\*57:01* is an example that illustrates how over assignment of the clinical syndrome and low allele frequency in certain population groups can wrongly lead to the assumption that a HLA association to a particular drug hypersensitivity is restricted to an ancestral group.<sup>[9,21]</sup> A case-control study was able to demonstrate the 100% sensitivity of *HLA-B\*57:01* as a marker for immunologically confirmed abacavir hypersensitivity, in both US white and black patients, demonstrating the clinical utility of allele screening that is generalizable across different ancestral groups.<sup>[22]</sup>

### Pharmacology

The most common compound classes that induce SCAR include antibiotics, anticonvulsants, analgesics, antituberculosis agents, antiretroviral and herbal agents.<sup>[23,24]</sup> In addition to the compound classes listed above, immune-modulatory targets and/or modalities may induce SCAR.<sup>[25,26]</sup>

### Pharmacogenomics

Associations between SCAR and specific class I and class II HLA alleles are medicinal product-specific and can vary across different populations (Table 10).<sup>[9,27,28,29]</sup> A comprehensive review of pharmacogenomic markers in SCAR has recently been published.<sup>[28]</sup> Currently, there is no specific pharmacogenomic marker or panel that will indicate a higher risk of SCAR for an investigational new medicinal product or recently authorized product, but the literature highlights<sup>[29,30,31]</sup> the importance of pharmacogenomics in determining SCAR risk factors in the post-authorization phase.

**Table 8. Age distribution for SCAR**Adapted from Singh et al.<sup>[18]</sup>

Permission obtained from John Wiley &amp; Sons

| age     | Percentage of SCAR condition<br>(modified from Singh et al.) |       |        |      |
|---------|--|-------|--------|------|
|         | SJS-TEN  | DreSS | ExDerm | AGEP |
| 0 - 18  | 17   | 14    | 15     | 23   |
| 19 - 40 | 32   | 36    | 26     | 35   |
| 41 - 65 | 51   | 50    | 59     | 42   |
| Total   | 100  | 100   | 100    | 100  |

**Table 9. Comorbid medical conditions at the time of SCAR diagnosis**Adapted from Singh et al.<sup>[18]</sup>

Permission obtained from John Wiley &amp; Sons

| Comorbidities              | Percentage of SCAR (modified from Singh et al.) |       |        |      |
|----------------------------|---|-------|--------|------|
|                            | SJS-TEN   | DreSS | ExDerm | AGEP |
| Seizure disorder           | 23  | 8     | 28     | 30   |
| Diabetes mellitus          | 9   | 8     | 22     | 30   |
| Connective tissue disorder | 8   | 13    | 17     | 20   |
| Malignancy                 | 8   | 8     | 0      | 0    |
| Cardiac disease            | 6   | 4     | 0      | 10   |
| Acute infection            | 37  | 50    | 22     | 0    |
| HIV                        | 8   | 8     | 6      | 0    |
| TB                         | 2   | 0     | 6      | 10   |

**Table 10. Key HLA associations with SCAR**Adapted from Peter et al.<sup>[9]</sup>

Permission obtained from Elsevier

| Drug and Clinical Presentation     | HLA Allele     | Population                               |
|------------------------------------|----------------|--|
| Abacavir Hypersensitivity Syndrome | <i>B*57:01</i> | 5-8% White<br>< 1% African<br>< 1% Asian |
| Allopurinol SJS/TEN and DRESS/DIHS | <i>B*58:01</i> | 9-11% Han Chinese<br>1-6% White          |
| Carbamazepine SJS/TEN              | <i>B*15:02</i> | 10-15% Han Chinese<br>< 0.1% White       |
| Carbamazepine DRESS                | <i>A*31:01</i> | Chinese<br>Europeans<br>Japanese         |

### 6.3.2. Differential diagnoses for SCAR

Clinical entities that mimic SCAR manifestations and are considered differential diagnoses include infections, autoimmune disorders and haematologic malignancies. Cutaneous eruptions that are due to an underlying disease (e.g. haematologic malignancies presenting with skin changes, autoimmune disease flares) may initially manifest with extensive skin involvement. Such eruptions need to be considered and ruled out as required.

On an individual level, there may be challenges to correctly diagnose SCAR and one must be aware that in clinical trials, such challenges might impact the study outcome if not addressed properly. To illustrate the importance of excluding possible differential diagnoses, RegiSCAR, a scoring system for the diagnosis of DRESS, has a criterion for the evaluation of alternative diagnoses (see also [Chapter 1.4.2.3 Clinical characteristics](#)). If three of the following tests are performed and are negative, one additional point is added to the patient's total score, in favour of DRESS: hepatitis A virus, hepatitis B virus, hepatitis C virus, mycoplasma, chlamydia, antinuclear antibody, blood culture.

#### 6.3.2.1. Skin manifestations of the underlying disease

Paraneoplastic erythroderma (PE) is described in association with haematologic malignancies, such as acute myeloid lymphoma and solid tumours (e.g. lung, prostate, thyroid, liver, ovaries, breast). Hence, an acute onset of erythroderma in oncology patients might be solely related to the underlying disease. PE can manifest as generalized erythema (> 90% of BSA), scaling, with or without lymphadenopathy. According to Curth's postulates, which are criteria used to identify a relationship between an internal malignancy and a cutaneous disorder, the malignancy and the skin disease run a parallel course. Successful treatment of the tumour leads to regression of the skin disease and, conversely, recurrence of the tumour leads to the return of cutaneous signs and symptoms.<sup>[32]</sup>

Leukaemia cutis is characterized by the infiltration of leukaemic cells into the epidermis, dermis or subcutaneous tissue. It may precede, follow, or occur concomitantly with systemic leukaemia in 2.1- 30% of patients.<sup>[33]</sup> Typical manifestations include macules, papules, plaques, nodules, ulcers and blisters, but an erythrodermic form has been described in a patient with newly diagnosed acute myeloid leukaemia shortly after induction chemotherapy.<sup>[34]</sup>

Patients with HIV infection are prone to syndromes manifesting with fever and rash due to the disease itself, infections or ADRs. Importantly, immune reconstitution inflammatory syndrome (IRIS) is an entity linked to the introduction of antiretroviral therapy (ART). IRIS occurs in 10-25% of patients who start highly active ART and is dependent on factors such as a low baseline CD4 cell count.<sup>[35]</sup> A study with 423 ART-naive patients with HIV infection found a median IRIS onset of 48 days.<sup>[36]</sup> IRIS-related cutaneous manifestations might have several presentations, depending on the eliciting agent and whether it is linked to an opportunistic infection. One example of a dermatological manifestation of IRIS is eosinophilic folliculitis, which can present with pruritic, erythematous papules or pustules, leukocytosis, eosinophilia and mimic AGEF.<sup>[37,38]</sup> Cutaneous leishmaniasis has also been described in the context of IRIS, with disseminated erythematous papules, oral and genital mucosa ulcers.<sup>[39]</sup>

#### 6.3.2.2. Infections

Numerous infectious entities can present with clinical manifestations that are undistinguishable from SCAR, which can delay the interruption of the culprit medicinal product as well as potentially introduce ineffective treatments. For DRESS/DIHS, due to concomitant fever and lymphadenopathy, viral diseases such as infectious mononucleosis, parvovirus B19 infection, Coxsackie infection, measles, dengue and viral hepatitis,<sup>[7,8]</sup> belong to the list of differential diagnoses to be considered. A retrospective analysis conducted in 2013 found that half of the patients with DRESS were initially diagnosed with infection (13/26 patients), which resulted in unnecessary treatment with antibiotics.

It is worth mentioning that a rash occurring in the setting of infectious mononucleosis and concomitant treatment with a penicillin-derived agent (e.g. ampicillin, amoxicillin) is not uncommon and may represent a transient virus-mediated immune alteration.<sup>[40]</sup>

AGEP presents with a combination of fever, leukocytosis and pustules, which can be easily confused with an acute infectious event. Pustulosis acuta generalisata is a differential diagnosis to be considered, usually occurring in children (although reported in adults as well) following a streptococcal infection.<sup>[10,41]</sup> Similarly, Staphylococcal scalded skin syndrome (SSSS) or Ritter disease is another possible differential diagnosis of infectious etiology for SJS/TEN and AGEP, more frequently seen in children and in adults with immunosuppression. It results from an infection with exotoxin-producing strains of *Staphylococcus aureus* (possible primary sources: impetigo, conjunctivitis, pharyngitis, otitis and wound infection) and presents with desquamation, blistering and constitutional symptoms, in the absence of mucosal involvement.<sup>[42]</sup>

### 6.3.2.3. Autoimmunity

Acute cutaneous lupus erythematosus (ACLE) may manifest as an acute onset of generalized rash in sun-exposed areas and since it is frequently associated with SLE, systemic manifestations and laboratory abnormalities can also be found. A severe subtype of ACLE, TEN-like ACLE, has been described, presenting with bullous lesions and epidermal detachment.<sup>[43,44]</sup> Characteristic histopathologic features and presence of elevated antinuclear antibody titres and positive anti-dsDNA antibodies can help distinguish ACLE from SCAR.<sup>[45,46,47]</sup>

A specific form of subacute cutaneous lupus erythematosus (SCLE), drug-induced (DISCLE), may also have a clinical presentation that can mimic SCAR. It can arise within weeks to years of medicinal product exposure, with a median latency of six weeks.<sup>[45]</sup> The most commonly implied drugs are thiazides, terbinafine, calcium channel blockers, angiotensin-converting enzyme inhibitors and TNF-inhibitors.<sup>[45]</sup> DI-SCLE has also been reported to occur in patients with prior diagnosis of SLE<sup>[48]</sup> and can be associated with Ro/SSA autoantibodies in > 80% of patients. Histopathology shows lupus erythematosus-specific changes and the SCLE lesions may last for weeks to months.<sup>[45]</sup>

Another autoimmune entity worth highlighting in this section is a subtype of pustular psoriasis: acute generalized pustular psoriasis (AGPP), also known as generalized pustular psoriasis of von Zumbusch. Medicinal product administration (e.g. lithium, progesterone, phenylbutazone, antimalarials, fluoxetine, ustekinumab, infliximab, adalimumab and apremilast), medicinal product withdrawal (e.g. systemic corticosteroids) and infections (e.g. upper respiratory tract infection) can be precipitating factors for AGPP.<sup>[49]</sup>

Its clinical presentation resembles AGEPE, with a sudden appearance of widespread sterile pustules on painful plaques/erythema and systemic symptoms (fever, malaise, arthralgia). Similar to AGEPE, mucosal involvement can occur, but factors such as history of prior episodes, personal or family history of psoriasis and presence of arthritis contribute to an AGEPE diagnosis.

### 6.3.2.4. Peripheral T-cell lymphomas

Angio-immunoblastic T-cell lymphoma, a mature peripheral T-cell lymphoma, can exhibit a similar clinical presentation to DRESS, with widespread rash, lymphadenopathy, peripheral eosinophilia, atypical lymphocytosis and other internal organ involvement.<sup>[50]</sup> The occurrence of B-symptoms (fever, malaise and weight loss)<sup>[51]</sup> prior to the onset of rash can be a clue for the diagnosis and is present in 55-77% of patients, as well as hepatosplenomegaly.<sup>[52]</sup> Histopathological examination of the skin might not be conclusive for the diagnosis and a lymph node biopsy might be required. Sézary syndrome, an aggressive type of cutaneous T-cell lymphoma, typically presents with erythroderma, pruritus and generalized lymphadenopathy, and can resemble DRESS. Peripheral blood findings

such as circulating leukaemic “Sézary cells” (atypical mononuclear cells) and skin biopsy findings can help in the distinction. A patient diagnosed with DRESS with persistent cutaneous alterations and/or constitutional symptoms beyond the expected time for clinical resolution, should prompt the investigator to consider peripheral T-cell lymphomas as possible diagnoses.

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# CHAPTER 7.

## POST-AUTHORIZATION SAFETY DATA COLLECTION AND ASSESSMENT

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### Chapter summary

Sources for post-authorization surveillance data include spontaneous AE reporting systems, EHRs, registries and post-authorization studies/trials. Analysis of individual case safety reports (ICSRs), aggregate safety reports and pharmacoepidemiologic studies are central to the identification of signs and symptoms that are suggestive of SCAR as an ADR.

### Conclusions or recommendations

Post-authorization data sources may detect and provide valuable insight into the real-world occurrence of rare AEs caused by a medicinal product such as SCAR.

EHRs, designed for longitudinal patient care may be used for studies or to confirm reports of SCAR in individual patients and establish causality between a medicinal product and a SCAR.

SCAR-specific registries and networks bring together comprehensive elements and expertise that may provide information on SCAR and evidence to support a causal relationship with a medicinal product.

## 7.1. Introduction

cADRs are among the most common AEs (2-3% of all AEs) reported throughout the lifecycle of medicinal products.<sup>[1,2]</sup> Since approximately 0.2-29.3% of patients with cADRs become severe and require hospitalization,<sup>[3,4,5,6,7]</sup> it is essential to detect symptoms indicative of prospective severity early during the process. While clinical trials offer precise data on the incidence (in the study population during the observation period of the trial) and severity of common AEs, reports collected after authorization offer insights into the occurrence and nature of cADRs in the real-world setting.

A close evaluation of pre-authorization data has shown that approximately 20% of safety issues leading to marketing withdrawals of a medicinal product or the addition of a boxed warning in its product labelling in the post-authorization phase were related to rare AEs such as serious skin and hypersensitivity reactions that are difficult to detect in pre-authorization clinical trials.<sup>[8]</sup>

## 7.2. Sources of data

International guidelines, in particular those issued by CIOMS and ICH, outline the sources and analytical approaches for data on AEs arising from the use of medicinal products in the general population.<sup>[9,10]</sup> Data sources for post-authorization surveillance include spontaneous reports, electronic health records (EHRs), registries, along with clinical trial data and preclinical data.

### 7.2.1. Spontaneous Adverse Event reporting systems

Spontaneous reporting of AEs suspected to be an adverse reaction to a medicinal product is at the heart of post-authorization safety surveillance. Healthcare professionals and consumers spontaneously report AEs associated with an intervention, i.e. use of a medicinal product in an individual patient or consumer.

The resulting Individual Case Study Reports (ICSRs) are designed to capture information that is relevant to the understanding of the AEs. ICSRs are submitted to the pharmaceutical company that is responsible for the medicinal product, and/or the applicable authority, in accordance with the spontaneous reporting system in that jurisdiction. Pharmaceutical companies are required to submit ICSRs to regulatory authorities as per local regulation. In ICSRs, cADRs reported as serious, i.e. leading to or prolonging hospitalization or disability/incapacity or are of a life-threatening nature and/or associated with a fatal outcome, or are otherwise medically important,<sup>[11]</sup> are specifically of interest in the detection and confirmation of serious SCAR. Medical history, concurrent medication along with start and stop dates and the potential for skin/mucosal reactions (e.g. included in the label) are routinely used for the assessment of a potential causal relationship with the medicinal products.

Key information for appropriate causality assessment includes the percentage of body surface area, laboratory tests, timing and dose of suspect and/or concurrent medication as well as personal and family medical history. Furthermore, follow-up with the reporter of the ICSRs may be challenging and the source medical documents are rarely available. Often AEs are not reported in real time<sup>[12]</sup> and underreporting is a well-recognized phenomenon of spontaneous reporting.<sup>[13]</sup> The aggregate data in large spontaneous reporting datasets are monitored and analysed for early identification of safety signals, especially for rare AEs.<sup>[14,15]</sup>

The WHO's VigiBase (over 40 million ICSR<sup>[16]</sup>), the EMA's EudraVigilance data analysis system (EVDAS – 14.5 million ICSR<sup>[17]</sup>) and the US FDA Adverse Event Reporting System (FAERS) – 2 million ICSR<sup>[18]</sup> are monitored for events that are disproportionately reported for a medicinal product.<sup>[12,19,20]</sup> Medicinal product-event pairs of disproportionate reporting are reviewed to determine if there is a potential safety signal for further investigation of causality and subsequent need for regulatory action.<sup>[21]</sup> Patterns of spontaneous reporting in large datasets can be used to generate hypotheses on associations with specific or class of medicinal products<sup>[21,22,23,24,25]</sup> and build models to predict factors such as chemical structure<sup>[26]</sup> and/or molecular targets<sup>[27]</sup> linked to SCAR.

### 7.2.2. Electronic Health Records

Electronic Health Records (EHRs) contain detailed patient-level information collected by healthcare professionals for a variety of reasons, e. g. billing and reimbursement, laboratory parameters or medications prescribed for a specific event. In EHRs, the standard International Classification of Diseases Clinical Modification (ICD-CM) coding systems is used to structure the relevant information.<sup>[28]</sup> EHRs enable the study of common diseases, medicinal product response phenotypes and the genetic profile of several diseases.<sup>[29,30]</sup>

The ICD-CM-based phenotyping algorithms applied to large insurance claims datasets such as US Kaiser Permanente and US FDA Sentinel Initiative and Medical Information Database Network can also inform the clinical course of the disease through longitudinal records,<sup>[28,31]</sup> detection of rare AEs<sup>[32,33,34,35,36,37]</sup> and evaluation of safety signals with characterization of emerging safety topics following medicinal product authorization.<sup>[38,39]</sup>

The correct diagnosis of SCAR is clinically challenging and routinely hindered by the circumstance of non-medicinal product related diseases such as EMM, being mistaken with SJS/TEN particularly in children.<sup>[40]</sup> Algorithms that combine clinical expertise, specific ICD codes, clinical course (including

the duration of hospitalization) and number of medical encounters together with biomedical analytics have been used to explore patients with a high likelihood of rare AEs such as SJS/TEN.<sup>[41,42,43,44,45]</sup>

In one study, the ICD-9 codes identified approximately 57 000 cases of potential SJS/TEN among approximately 60 million patients in 12 US research units and managed care organizations. Of the potential cases, 276 of them were each adjudicated by 2 or 3 board-certified dermatologists. Multivariate models were used to detect factors independently associated with validated SJS/TEN case status. Length of hospitalization and application of new ICD codes specific to SJS/TEN increased the likelihood of SJS/TEN case status. The positive predictive value (PPV) of ICD-9 codes 695.12695.15 was 50% among hospitalized cases and of those hospitalized for three or more days, the PPV ranged from 57-92%. These results provide some support via a combination of search codes and search terms for identifying cases using EHR data.<sup>[41]</sup>

A separate study demonstrated that the PPV for ICD codes specific to SJS/TEN was 29%. The addition of medicinal product-specific ICD codes with SJS/TEN-specific or erythema multiforme codes increased the PPV to 38% and maintained a 99.8% NPV for phenytoin-related SJS/TEN.<sup>[46]</sup> These exploratory and mining algorithms along with their performance metrics (e.g. PPV and NPV) rely on predetermined algorithm definition and selection criteria and need to adapt to the evolving clinical definitions of SCAR.<sup>[47]</sup> Because SJS/TEN is a rare and severe reaction, EHR-based algorithms should favour sensitivity over specificity (i.e. high NPV) with reasonable PPV. Innovative methodology and technology such as Boolean logic, natural language processing and machine learning can be shown to produce reliable algorithms.<sup>[47]</sup>

Furthermore, innovative technological solutions can be used to leverage the unstructured data (e.g. pictures, pathology records, clinical records including percentage of BSA and/or mucosal involvements) included in EHRs. Natural language processing and artificial intelligence offer the opportunity to automatically recognize and translate the unstructured data into specific data points accessible by automated search algorithms. The technology can also identify patterns to ascertain medicinal product causality particularly if multiple medicinal products were initiated within a short time period.<sup>[46]</sup>

### 7.2.3. Registries and Networks

In general, registries refer to both programmes that collect and store data and the records that are so created.<sup>[48]</sup> The National Committee on Vital and Health Statistics describes registries as “an organized system for the collection, storage, retrieval, analysis, and dissemination of information on individual persons who have either a particular disease, a condition (e.g. a risk factor) that predisposes <sup>[them]</sup> to the occurrence of a health-related event, or prior exposure to substances (or circumstances) known or suspected to cause adverse health effects.”<sup>[49]</sup> Additionally, EMA describes patient registries as “organised systems that use observational methods to collect uniform data on a population defined by a particular disease, condition or exposure, and that is followed over time” that can help monitor the safety of medicines.<sup>[50]</sup>

The term patient registry is generally used to distinguish registries focused on health information from other record sets. Other terms also used to refer to patient registries include clinical registries, clinical data registries, disease registries and outcomes registries.<sup>[51,52]</sup> Coordination between registries to create a network may aid in data collection harmonization across different disease areas and interoperability between registries.<sup>[53]</sup>

Registries include extensive records of healthcare knowledge beyond specific effects of a medicinal product of interest. The historical or contemporaneous control data included in the registries are increasingly used to gain insight into the “real world” data.<sup>[54]</sup>

Registries or registry studies may be required as part of marketing authorization for several reasons:

1. If the benefits, but more specifically the risks, are not completely understood at the time of authorization,
2. Address a specific concern about safety or efficacy,
3. Generate post-authorization data in more extensive patient populations while providing access in a restricted population.<sup>[55]</sup>

Regulatory authorities may require “new registries” to be developed as well as the use of existing disease registries to perform “registry studies”.<sup>[54]</sup> FDA and EMA have developed detailed guidance for industry to address identified and potential safety concerns and how to deal with missing data.<sup>[56,57]</sup> A retrospective review identified a total of 73 registries for the 116 new drugs – 46 disease registries and 27 (exposure to a single) drug registries – approved by the Committee for Medicinal Products for Human Use (CHMP) in the EU between January 1, 2007 and December 31, 2010. For nine drugs, the registry was a specific obligation imposed by the regulators. The level of innovation and the orphan status of the drugs were determinants positively predicting post-authorization registries (OR 10.3 [95% CI 1.0-103.9] and OR 2.8 [95% CI 1.0-7.5], respectively).<sup>[58]</sup>

Effective coordination of medical, surgical, behavioural and basic scientific disciplines is required to efficiently reduce SCAR-related short- and long-term morbidity and mortality, and advance clinical care and research. Professional networks bring together SJS/TEN phenotype adjudication committees, centralized biological sample collection and repositories in platforms to study the pathogenesis and predictors of SCAR. These networks are leveraged to rigorously define criteria for clinical diagnosis, causality assessment, estimation of risk factors and centralized sample collection to aid the study of the mechanisms and search for treatment options.<sup>[46]</sup> Examples of registries and networks follow.

## RegiSCAR

RegiSCAR is a multinational SCAR registry which includes samples of medicinal and biological products that aim to reduce the medical and economic burden of SCAR on public health and improve the safety of medication use. The objectives of RegiSCAR are:

1. build a European Registry of SCAR for continuous surveillance of new medicinal products with adequate pharmaco-epidemiologic methodology and for providing reference information on SCAR
2. organize a centralized collection of biological samples (plasma, lymphocytes, DNA and skin) to allow high quality studies on pharmacogenetics and investigations of the mechanisms of these reactions
3. constitute a cohort of patients in order to study the SJS/TEN outcome, prognosis factors, sequelae and impact on quality of life of these severe side effects of medicine.

The RegiSCAR study includes all reports of SJS/TEN, AGEP and DRESS in patients hospitalized in one of the institutions participating in the network in six countries. In each country, a trained investigator interviews each case patient and collects information on medication use in the eight weeks prior to disease onset, recent infections, demographic information and relevant medical history in a standardized case record form. Each case record is ascertained by an international group of experts by means of a strict validation process.

Skin biopsies (patients) and blood samples (patients and controls) are sent to a specialized tissue bank for separation and conservation of plasma, lymphocytes and DNA. The data registry provides estimates of the risks of medicinal products using case-control and case cross-over analyses as well as linkage to databases on medicinal product utilization. RegiSCAR also provides information on the outcome, allows the validation of prognosis indexes and gives insights on the effects of treatments.

Biological samples are used to determine the phenotype, functions and antigenic specificity of lymphocytes isolated at the time of the reaction from the blood and skin of patients. In addition the samples are used to study the susceptibility genes by an association study directed first at candidate genes and second at the full genome by using 1000 single nucleotide polymorphisms and determine the serum level of a variety of cytokines that may have a prognostic value.<sup>[59]</sup>

### **Australian Registry of Severe Cutaneous Adverse Reactions**

The Australian Registry of Severe Cutaneous Adverse Reactions (AUS-SCAR) is a multidisciplinary collaboration utilizing a range of clinical, health services and translational research methodologies to address the significant knowledge gaps in SCAR causality, prevention, diagnosis and treatment. AUS-SCAR collects prospective clinical data (medicinal product causality, treatments and outcomes) and bio-banked samples (DNA, blood and skin) from patients at 15 participating Australian sites. The data is subsequently used to examine SCAR epidemiology, causality, pharmacogenomic predictors and explore novel ex vivo/in vitro diagnostics.<sup>[60]</sup>

### **International Registry for Toxic Epidermal Necrolysis**

The International Registry for Toxic Epidermal Necrolysis (IRTEN) is an international, observational web-based registry for prospective anonymized collection of clinical data and biological samples in individuals suffering of SJS/TEN. The IRTEN data is used to enhance the understanding of SJS/TEN including its epidemiology, clinical characteristics including outcome, short- and long-term complications, real-time data concerning causative medicinal products and therapy, with the ultimate aim of fostering improved patient care.<sup>[61]</sup>

### **U.S. FDA Sentinel Initiative**

The Sentinel Initiative was launched in May 2008<sup>[62]</sup> in response to the FDA Amendments Act of 2007. The Initiative is the largest multisite distributed database in the world dedicated to marketed medical product safety. The Sentinel Operation Center leverages organizational partnerships in the areas of epidemiology, clinical medicine, pharmacy, statistics, health informatics, data sciences and network operations to support post-authorization safety analyses.<sup>[62]</sup> An important aspect of Sentinel's active surveillance is to develop and understand the validity of algorithms for identifying health outcomes of interest.<sup>[62]</sup>

### **Society of Dermatology Hospitalists SJS/TEN Study Group**

The Society of Dermatology Hospitalists (SDH) is a collaborative research effort of 18 tertiary care centres. Retrospectively, SDH member institutions collected information on SJS/TEN patients related to disease course, management and outcomes. The SDH database includes 405 SJS/TEN cases in the United States between 2000 and 2015, with most treated after 2010. In this cohort, 66% of patients met the definition criteria for TEN (> 30% BSA denuded) or SJS/TEN overlap (10–30% BSA denuded) at the time of admission.

At the time of admission, the severity of illness score for TEN (SCORTEN)<sup>[63]</sup> predicted mortality for the cohort to be 20%. Actual mortality of patients in the cohort was 13.7%, yielding a standardized mortality ratio of 0.69 (95% confidence intervals 0.57, 0.78). Medications accounted for 91.3% of cases, predominantly implicating trimethoprim/sulfamethoxazole (26%).<sup>[46]</sup>

### **Canadian Pharmacogenomics Network for Drug Safety**

The Canadian Pharmacogenomics Network for Drug Safety (CPNDS) is pan-Canadian active surveillance network that compiles the detailed information collected by trained active surveillance clinicians.

The CPNDS database includes detailed clinical information with 93 974 reports of medication use, including 10 475 reports of ADRs,<sup>[64]</sup> which can be used to identify novel predictive genomic markers of severe ADRs in children and adults. The CPNDS was the first group to confirm the role of HLA markers for carbamazepine-related skin reactions in children.<sup>[65]</sup>

The CPNDS actively investigates both previously identified pharmacogenomic biomarkers and novel genomic variations associated with severe reactions. Collaboration with the EpiPGX Consortium has led to the identification of over 80 SCAR cases related to anticonvulsants. Additionally, the CPNDS has published clinical practice guidelines for carbamazepine-related ADRs<sup>[66]</sup> and collaborates with several consortia to update guidelines and develop pharmacogenomic panels for commercial use that include ADR pharmacogenomic markers.

### International Consortium on Drug Hypersensitivity Network

The International Consortium on Drug Hypersensitivity (ITCH) network was established to recruit patients with SCAR and includes approximately 1500 phenotyped cases from 12 countries with associated genetic data.<sup>[67]</sup> The ITCH cohort has been used to identify medicinal product-specific genetic predisposing factors and genetic factors predisposing to SJS/TEN regardless of medicinal product etiology. GWASs conducted on 1260 SCAR cases in the cohort included quality control procedures (i.e. controlling for population stratification, imputation using the latest releases of genomic data and validation of imputed genetic variants).

The ITCH database includes 177 SJS/TEN cases from Caucasian patients from three ethnic groups: Spanish, Italian and Northern European. Evaluation of the 177 SJS/TEN cases identified an HLA-B allele that is associated with SJS/TEN irrespective of drug. This HLA-B allele is present at 0.02% of the general Caucasian population ( $n = 9237$  not exposed to drug) but is found at 100-fold higher frequency among SJS/TEN cases.<sup>[68]</sup> Medicinal product-specific analysis of cases in the ITCH cohort have replicated HLA allele associations previously identified in other populations. In 13 European patients with allopurinol-related SCAR of whom nine had SJS, *HLA-B\*58:01* was identified at a genome-wide significance level with an odds ratio of 36.<sup>[68]</sup> While the association of *HLA-B\*58:01* with SJS was just below genome-wide significance in this population, the odds ratio was higher at 45,<sup>[68]</sup> which is consistent with previous data suggesting that *HLA-B\*58:01* is present in approximately 60% of allopurinol-related SJS/TEN patients of European ancestry.

Moreover, the ITCH network includes African recruitment sites. Evaluation of the African cohort has identified the association of *HLA-C\*04:01* with SJS/TEN secondary to nevirapine. Additional analysis of the interaction of *HLA-C\*04:01* with the endoplasmic reticulum aminopeptidase genes, which influence peptide processing, demonstrated that endoplasmic reticulum aminopeptidase 2 may have a protective effect.<sup>[69]</sup>

## 7.3. Identifying cases of SCAR and assessing causality with post-authorization information

The causality assessment of a suspected ADR is an essential approach in pharmacovigilance, as an attempt to investigate the association between the suspected ADR and the use of a certain medicinal product. Safety information collected during the post-authorization phase is one of the main sources for identifying cases of SCAR because these reactions are usually rare and therefore may only be recognized after a medicinal product has been approved and used by a large number of patients.<sup>[70]</sup> Retrieval of SCAR reports depends on the search capabilities of a given data source. For example, data sources that utilize the Medical Dictionary for Regulatory Activities (MedDRA) allow retrieval

of reports coded with a diagnosis (e.g. Stevens-Johnson syndrome) or a variety of related medical concepts known as a Standardised Medical Query (SMQ), which are available for SCAR and DRESS.

Given the variability of information provided in ICSRs, post-authorization reports of SCAR should be assessed against specified criteria (e.g. case definition), which may include a combination of signs, symptoms, and test results (see also [Chapter 1.3 Table 1.](#)), to identify with confidence reports describing SCAR. After SCAR cases are identified, an assessment for causality can be conducted to evaluate the association between the medicinal product and SCAR.

### 7.3.1. Causality assessment for ICSRs

Given the rare occurrence but high risk of adverse sequelae including fatal outcomes of SCAR, spontaneous reporting of suspected SCAR by healthcare professionals is key for the identification, assessment and management of SCAR risk in the post-authorization phase. Additionally, applicable reporting systems including relevant case details permit a meaningful assessment of SCAR subsequent to treatment with a particular medicinal product (see also [Appendix 2. Examples of Targeted Follow Up Forms](#)). The determination of causality for ICSRs in pre- and post-authorization phases alike, refers mainly to medical assessment (see also [Chapter 5](#)) as well as the use of defined algorithms (e.g. ALDEN score for SJS/TEN) (see also [Chapter 5.2.2.1 Algorithm of drug causality for epidermal necrolysis](#)).

There are different causality classifications (e.g. WHO-UMC scale, Naranjo scale),<sup>[71,72]</sup> and a simplified binary yes/no causality has been recommended by some to facilitate manufacturer identification of cases for reporting to regulatory authorities<sup>[73]</sup> (see also [Chapter 5](#)). However, to date there is no universally-accepted causality assessment scale. When assessing medicinal product causality in a patient with SCAR, several factors should be taken into consideration including SCAR type, day of symptom onset (“index day”), medicinal product notoriety, time since medicinal product intake and onset of reported event, dechallenge/rechallenge information, comorbidities, concomitant medications, and plausible biologic or pharmacologic explanation. In general, for the assessment of the temporal relationship of medicinal product intake to event onset, five times the elimination half-life (“rule of five”), can be used.

However, since the elimination of a medicinal product varies from person to person due to factors like age, weight, other medications taken, as well as kidney function and/or liver function, the use of the elimination half-life can only be an estimate of how long it may take for the medicinal product to be removed from the body. Challenges for causality assessment especially in post-authorization reporting are incomplete case information, use of multiple medicinal products and inter-current or chronic underlying illness.

### 7.3.2. Risk management planning and pharmacovigilance strategies

With the potential for severe and life-threatening outcomes, additional risk management measures, in addition to routine risk minimization measures such as product labelling, may need to be implemented to prevent or reduce the severity of outcomes from SCAR. These risk minimization measures are discussed in [Chapter 8](#).

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# CHAPTER 8.

## RISK MINIMIZATION

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### Chapter summary

Prompt evaluation and discontinuation of the suspect medicinal product(s) are the most appropriate immediate interventions in the management of SCAR in individual patients, once detected. Such interventions should be based on the benefit-risk balance of the medicinal product for the given patient.

Key developments in SCAR research include new technologies allowing the identification of genetic risk factors with improved sensitivity, specificity and efficiency.

Routine risk minimization measures and additional risk minimization measures for SCAR are presented with examples.

### Conclusions or recommendations

The recognition and diagnosis of SCAR can be challenging. Awareness of patients, caregivers, and HCPs of the risk of SCAR with medicinal products is paramount to ensure timely discontinuation of the medicinal product and administration of appropriate treatment, given their potential for severe and life-threatening outcomes. Hence, risk minimization, comprised of routine and additional risk minimization measures, is essential to ensure the safe use of these medicines.

The selection of routine and additional risk minimization tools to inform patients and HCPs of a medication's benefits and risks is vital for patients to make informed treatment decisions. Risk minimization for SCAR ensures awareness of recommendations for identifying patients at risk, characteristics of the risk for timely recognition of SCAR and recommended actions to monitor patients and prevent or improve potential clinical adverse outcomes.

## 8.1. Introduction

Risk is defined as “the probability of developing an undesirable outcome relating to the quality, safety or efficacy of the medicinal product as regards patients’ health or public health or any undesirable outcomes with regard to the environment”.<sup>[1]</sup> Risks in terms of ADRs are characterized by the following ADR attributes: severity (intensity), frequency, potential for prevention or early detection, extent of reversibility and range of outcomes. The regulatory categorization of AEs relevant to risks as “serious” or “non-serious” is primarily used to provide guidelines for pharmaceutical companies for AE report submission to regulatory authorities and is applied to regulatory risk assessments. Seriousness should be distinguished from severity which describes the intensity of an event. In addition to other attributes and patient risk factors, the severity of an event could lead to clinical outcomes whose mitigation may require a particular type of intervention. Grading of severity (i.e. mild, moderate, severe) may be dependent on medical judgement and patient perspective; however, grading systems for AEs and laboratory abnormalities are currently being utilized (e.g. CTCAE, Drug-Induced Liver Injury Network). The assessment of the severity of an adverse reaction, its frequency, and other attributes and risk factors, are necessary to understand the impact of the adverse reaction on the benefit-risk profile of a product.

Categorical definitions of risks are utilized in regulatory risk management documents. The ICH Pharmacovigilance Guidance has provided the following categories of risks:<sup>[1]</sup>

- ▶ Identified Risk: an untoward occurrence for which there is adequate evidence of an association with the medicinal product of interest,
- ▶ Potential Risk: an untoward occurrence for which there is some basis for suspicion of an association with the medicinal product of interest but where this association has not been confirmed,
- ▶ Important identified risk and important potential risk: an identified or potential risk that can impact the benefit-risk profile of the product or have implications for public health. What constitutes an important risk will depend on several factors, including the seriousness of the risk, and its impact on individual and public health. Typically, any risk that is likely to be included in the Contraindications or Warnings and Precautions section of the product information should be considered important.

An additional concept that could constitute a form of risk for a medication and is therefore included in risk management, pertains to missing information, i.e. gaps in knowledge about the safety of a medicinal product for a certain anticipated use or use in particular patient populations.<sup>[2]</sup>

## 8.2. Risk management

Risk management entails the following reiterative cycle: identification, assessment/characterization, prevention/mitigation and measurement of the effectiveness of the risk minimization measures.<sup>[1,3]</sup> Once risks have been identified and assessed for clinical relevance, potential patient outcomes and overall impact, risk management strategies are then planned and developed. Risk management occurs throughout the medicinal product lifecycle.

The primary objective of risk management strategies is to improve patient outcomes. To do this, pharmacovigilance activities for data collection and assessment are instituted to understand and characterize the risk. Additionally, risk minimization measures to reduce the frequency that the risk will occur (termed “risk prevention”) or/and reduce the severity when it does occur (termed “risk mitigation”) and reduce undesirable outcomes, may be implemented.<sup>[1]</sup> Although there are a number of risks that cannot be eliminated, their frequency and/or severity may be substantially reduced by developing and adopting appropriate risk minimization measures and ensure implementation in healthcare.

Given that SCAR could occur, albeit infrequently, during the clinical development of a medicine, additional safety data may be needed either to provide additional evidence to identify a causal association between SCAR and a suspect medicine, further support the causal association between SCAR and an implicated medication or further characterize this risk in the post-authorization setting, where increased utilization by the population is expected. As a result, beyond routine surveillance for SCAR, additional pharmacovigilance activities, as described subsequently, may also be required.<sup>[4]</sup>

These additional pharmacovigilance activities may include active and targeted surveillance in collaboration with key dermatology stakeholders or organizations that collect safety data relevant to SCAR, such as registries, networks and tertiary referral medical centres. Importantly, additional pharmacovigilance activities in the form of post-authorization requirements/commitments and Post-Authorization Safety Studies may be required as a condition for authorization to confirm or further characterize the risk of SCAR from a medicinal product in the indicated population.

The types of safety studies conducted to further characterize risks in the post-authorization setting include post-authorization observational studies, non-interventional safety studies, post-authorization surveillance safety studies<sup>[5]</sup> and pharmaco-epidemiologic studies utilizing real-world data.

At the time of authorization, risk management activities are described in detail in documents such as the Risk Management Plan (RMP) in the EU and the Pharmacovigilance Plan (PV Plan) and Approval Letters in the US. These risk management documents describe the activities and studies that will be conducted in the post-authorization setting to identify risks and/or further characterize the safety profile of the authorized medicinal product and the measures to prevent or minimize the risks associated with the medicinal product.<sup>[6]</sup>

There are two types of risk minimization measures, routine and additional, which are further discussed below.

### 8.3. Routine risk minimization measures

Risk minimization measures that comprise standard activities and provide information on the benefits and risks of a medicinal product for patients and HCPs are classified as routine risk minimization measures.

These measures include product information, developed by marketing authorization holders and subject to regulatory approval, whose purpose is to inform patients and HCPs on the appropriate and safe use of a medicinal product,<sup>[1]</sup> e.g. U.S. Prescribing Information and for specific products, the Medication Guide, EU SmPC, Canadian Product Monograph, Japanese Product Information, patient information brochures and information on medicinal product packaging. Also included are the package size that is appropriate to the typical treatment duration and the risk-appropriate legal status of the product (i.e. prescription-only medication).<sup>[7]</sup>

The information and recommendations outlined in the product information<sup>[1]</sup> should therefore support the optimal and safe use of a medicinal product in clinical practice with the goal of providing the appropriate medicine at the correct dose and timing, with an awareness of the benefits and risks of the product.

Especially for medicinal products for which a causal association with a severe or potentially life-threatening outcome of an ADR has been identified, adequate information and recommendations for monitoring and treatment are needed in the medicinal product's patient brochure to ensure awareness and the actions that should be taken to manage the risk, including reporting specific signs and symptoms to HCPs<sup>[1]</sup> (e.g. US Patient Package Insert and Medication Guide or EU package leaflet).

Information relevant to risks and severe and/or serious ADRs are usually included in specific sections of the label, such as "Warnings and Precautions" and "Undesirable Effects/Adverse Reactions," and are reflected in the patient brochure/package leaflet.

In addition to information regarding the character, severity, outcome(s) of the risk or ADR, an estimate of the frequency should be provided and expressed in a standard category of frequency.<sup>[8]</sup> If the frequency cannot be estimated from the clinical trials or post-authorization data, the term 'not known' may be used. This may be applicable when the ADR has been identified from spontaneous reporting without knowledge of the exposure at population level and given possible underreporting.

In general, the language used to describe the risks in the product information should be clear and concise. Detailed recommendations from regulatory authorities regarding the description and

characterization of the risks, together with actions that may prevent and/or mitigate such risks can be found in regulatory guidance documents, including the EU Guideline on the Summary of Product Characteristics<sup>[9]</sup> and the U.S. FDA Guidance for Industry for product information.<sup>[10,11]</sup>

Examples of language used to describe and/or characterize the risk of SCAR in product information of authorized medications can be found in [Appendix 1](#).

For some medicinal products, additional risk minimization measures may be required as part of the marketing authorization terms in addition to the product information, patient brochure, and product container/package information

### 8.3.1. Routine risk minimization measures for SCAR

SCAR, as described in [Chapter 1](#) of this Report, are diverse cADRs that range from common, mild and self-limited cutaneous reactions with an estimated incidence of 0.3% to 8%, to uncommon potentially life-threatening forms of delayed systemic hypersensitivity. Cutaneous clinical manifestations range from maculopapular exanthema, urticaria, FDE, phototoxic and photoallergic eruptions to erythema-multiforme-like reactions.

At baseline, routine risk minimization measures are necessary to provide prescribers and patients with information relevant to cADRs and SCAR. These include product information, the patient brochure/package leaflet and container/package information, as previously stated. (See examples: [Medicinal Product A](#), [Medicinal Product B](#), [Medicinal Product C](#), [Medicinal Product D](#)). While product information such as the EU Summary of Product Characteristics<sup>[9]</sup> and US Prescribing Information<sup>[12]</sup> are directed to HCPs, patient brochures and package leaflets are directed towards patients. As such, HCP-directed materials should provide “information for healthcare professionals on how to use the medicinal product safely and effectively,”<sup>[9]</sup> while information for patients should be accessible to and understood by patients,<sup>[13]</sup> providing concise, essential information for patients to use their medicinal product safely and effectively.<sup>[14]</sup>

Of note, terminologies used in the product information should be considered carefully to ensure standardization and consistency. Terminologies should be standardized based on Medical Dictionary for Regulatory Activities (MedDRA),<sup>[15]</sup> as agreed in the ICH framework.

For SCAR, the following MedDRA Preferred Terms (PTs) are available under the MedDRA version 27.0 Preferred Terms: ‘Stevens-Johnson syndrome’, ‘Toxic epidermal necrolysis’, ‘Acute generalized exanthematous pustulosis’, ‘Drug reaction with eosinophilia and systemic symptoms’, ‘Generalized bullous fixed drug eruption’, ‘SJS-TEN overlap’ and ‘AGEP-DRESS’.

Because SCAR may potentially be severe and/or serious and possibly life-threatening, risk management of SCAR may necessitate strategies beyond these routine risk minimization measures. These will be addressed in the following sub-section (Additional risk minimization measures).

## 8.4. Additional risk minimization measures

In addition to routine measures adopted to address medicinal product risk, additional risk minimization measures are “tools meant to emphasise the information on the risk and the intended actions for risk minimisation contained in the product information and to support and/or control the adherence to the intended actions”.<sup>[3]</sup> Additional risk minimization measures are required and implemented to ensure the safe and effective use of the medicinal product.

These measures aim to ensure the following:

- ▶ Guide appropriate patient selection with the exclusion of patients where use is contraindicated,
- ▶ Support on-treatment monitoring of important risks and/or
- ▶ Early identification and management of an adverse reaction to limit its severity/seriousness and mitigate adverse outcomes.<sup>[16]</sup>

### 8.4.1. Additional risk minimization measures for SCAR

In addition to routine risk minimization (e.g. product information), further risk minimization measures have been developed and implemented to expound on information found in the product information regarding risks and actions for risk minimization, outcomes, screening, identification of patients at risk, monitoring and management. In the context of SCAR, these may include the following activities/programmes:

- ▶ Educational tools/training programmes, used to provide targeted information regarding risks to HCPs or patients (e.g. patient alert card,<sup>[17]</sup> guides for HCPs or patients), to supplement product information,
- ▶ Risk Evaluation and Mitigation Strategies (REMS), a medicinal product safety program implemented in the U.S. and required for certain medications to inform, educate and reinforce actions to reduce the frequency and/or severity of a safety outcome, such as a SCAR.<sup>[18]</sup> Elements to assure safe use (ETASU) may be a component of a REMS programme, in addition to materials distributed to HCPs, pharmacists, and nurses and handouts for patients, such as Medication Guides,<sup>[19]</sup>
- ▶ Other risk minimization measures, such as Dear Health Care Provider (DHCP) letters.<sup>[20]</sup>

An example of an additional risk minimization measure implemented for a SCAR associated with a medicinal product ([Medicinal Product E](#)) is provided below. (See also [Appendix 1.](#))

#### 8.4.1.1. Educational tools for healthcare professionals for SCAR

Educational tools for HCPs provide specific recommendations on the use (what to do), the contraindications (who the product should not be prescribed to), and/or warnings (e.g. how to prevent or manage the described risk or adverse reaction) associated with the medicinal product and the key risks that require additional minimization measures.<sup>[16]</sup> These educational tools may include guidance on prescribing (including selection of patients, testing, monitoring), special administration procedures and details of information to be given to patients and other information on managing risk.

The type and format of a particular tool is dependent on the target audience, message and modalities of use of the medicinal product. Tools can include HCP guides, training programmes featuring websites, brochures, posters and check lists (e.g. if certain actions need to be performed prior to prescribing a medication).

For [Medicinal Product E](#), educational programmes were developed to increase HCP awareness and understanding of the risk as well as the related risk minimization actions. In addition, these programmes also expand on information that is included in the product information.<sup>[21]</sup> These were published on a website aimed at HCPs. In addition, a slide presentation was included and provides guidance on HLA-B screening, information about diagnosis of hypersensitivity reaction, management and avoidance of rechallenge.

#### 8.4.1.2. Educational tools for patients and/or caregivers for SCAR

Educational tools targeting patients and caregivers aim to increase their awareness of risks associated with a medicinal product to inform their decision to initiate treatment, awareness of signs and symptoms of adverse reactions and/or risks for early recognition and awareness of the course of action to take should any of these sign or symptoms occur.<sup>[1,6]</sup> A patient alert card is a tool designed to inform patients of a particular risk.<sup>[1]</sup> It is used when patients are required to carry with them essential information about their current therapy and the main risks associated with this therapy. A further purpose may be to alert HCPs of the risks and if needed, ensure medical intervention. In the US, some medicinal products are dispensed to patients with a Medication Guide, as part of authorized product information.

The information contained in the patient alert card should be succinct and kept to the minimum necessary to convey the key minimization messages and required action.<sup>[1,8]</sup> For the example of Medicinal Product E above, the patient alert card contains information about the clinical presentation of the hypersensitivity reaction and guides patients to call their HCPs immediately for guidance in case two or more of the following signs or symptoms occur: fever, skin rash (redness and/or itching), nausea, vomiting, diarrhoea, abdominal pain, severe tiredness, achiness or general ill feeling.

#### 8.4.1.3. Other examples of additional risk minimization measures

Other examples of additional risk minimization measures are DHPC, letters and the Medication Guide (when part of a REMS programme) in the U.S.

DHPCs are communications by which important information is delivered directly to individual HCPs by a marketing authorization holder or competent authority, to inform them of the need to take certain actions or adapt their practices in relation to a medicinal product.<sup>[1,8,22]</sup>

DHCP letters are correspondences to HCPs that are often in the form of a mass mailing from the manufacturer or distributor of a human medicinal product or from a regulatory body. DHCP letters alert HCPs about new or updated information regarding a human medicinal product.<sup>[2,3]</sup> In the context of SCAR, DHPCs should be considered when there is a need to inform HCPs to take immediate action or change current practice in relation to a medicinal product.

These situations<sup>[22]</sup> include:

- ▶ a new warning or precaution of a SCAR risk in the product information;
- ▶ identification of a new risk of SCAR or change in the frequency or severity of a known SCAR risk;
- ▶ new recommendations for preventing or treating SCAR;
- ▶ an ongoing assessment of an important potential risk of SCAR, for which the data that is available at a particular point in time are insufficient to take regulatory action (in this case, the DHCP letter should encourage close monitoring of the safety concern in clinical practice as well as reporting and possibly provide information on how to minimize the potential risk).

The content of the proposed DHCP letter should be agreed between the marketing authorization holder and the regulatory authority. An example of a DHCP letter, in this case a Dear Healthcare Professional Communication, previously considered an additional risk minimization measure, that was issued in response to the risk of SCAR associated with a medicinal product (Medicinal Product F) is described in Appendix 1.

## 8.5. Evaluating the effectiveness of risk minimization

When an additional risk minimization measure is developed to prevent or mitigate a risk such as SCAR, planning is required on evaluating the effectiveness of the risk minimization tools, interventions or programmes. This is an integral and critical component of risk management to ensure that risk minimization measures change the behaviour of patients and HCPs and leads to improved patient outcomes.

Studies have been conducted in which a number of approaches have been applied to evaluate the effectiveness of the risk minimization measures, interventions or programmes. The objectives of these studies are to identify factors that lead to a desired outcome and understand how the proposed tools, interventions or programmes impact these factors and outcomes when used in a 'real-world' setting. The initial step is to develop a study protocol prior to the implementation of the tool/intervention/programme that is being evaluated. The study should measure the effectiveness of a programme in several different aspects (i.e. domains or dimensions): programme coverage, efficacy/effectiveness, adoption, implementation and maintenance.

Next, the study should evaluate the degree to which a proposed risk minimization programme is implemented in 'real-world' conditions as intended (implementation fidelity) in key areas (exposure, content, frequency, duration). Lastly, to appropriately evaluate the effectiveness of a risk minimization tool/intervention/programme, the study should provide a detailed analysis plan with pre-specified outcome indicators that use clinically-relevant risk prevention or mitigation endpoints and thresholds which, in turn, must be met to determine success. Considerations include the use of appropriate comparators, performance measures and time points for analysis.<sup>[1]</sup>

Details of the various approaches to consider when developing studies to evaluate the effectiveness of risk minimization measures are found in the Report of CIOMS Working Group IX: Practical Approaches to Risk Minimisation for Medicinal Products. Given the evolving landscape of risk management, the framework and methodologies that guide the development of effectiveness studies will continue to change to ensure that evaluations remain pragmatic and robust.<sup>[1]</sup>

## Chapter 8 – References

- 1 EMA. Guideline E2F Development Safety Update Report Step 5
- 2 EMA. Guideline on good pharmacovigilance practices (GVP) Module V – Risk management systems (Rev 2). 2017
- 3 EMA. Guideline on good pharmacovigilance practices (GVP) Module XVI – Risk minimisation measures (Rev 3)
- 4 FDA. Best Practices for FDA Staff in the Postmarketing Safety Surveillance of Human Drug and Biological Products
- 5 FDA. NDA Letter
- 6 EMA. Guideline on good pharmacovigilance practices (GVP) Annex I - Definitions (Rev 4)
- 7 EMA. Guideline on good pharmacovigilance practices (GVP) 4 Module XVI – Risk minimisation measures: selection of tools and effectiveness indicators (Rev 3), 1 February 2021 EMA/204715/2012
- 8 CIOMS. Guidelines for Preparing Core Clinical Safety Information on Drugs Report of CIOMS Working Group III. 1995.
- 9 European Commission. A Guideline on Summary of Product Characteristics (SmPC). Revision 2 September 2009.
- 10 FDA. Guidance for Industry Warnings and Precautions, Contraindications, and Boxed Warnings Sections of Labeling for Human Prescription Drug and Biological Products —Content and Format
- 11 FDA. Guidance for Industry Adverse Reactions Section of Labeling for Human Prescription Drug and Biological Products — Content and Format
- 12 FDA. Frequently Asked Questions about Labeling for Prescription Medicines For Healthcare Professionals
- 13 EU Commission. Guideline on the Readability of the Labelling and Package for Human Use - Revision 1, 12 January 2009
- 14 FDA. Patient Medication Information (PMI)
- 15 MedDRA. <https://www.meddra.org/>
- 16 EMA. Guideline on good pharmacovigilance practices (GVP) Module XVI – Risk minimisation measures: selection of tools and effectiveness indicators (Rev 2)
- 17 CIOMS. Practical Approaches to Risk Minimisation for Medicinal Products: Report of CIOMS Working Group IX. 2014.
- 18 FDA. Risk Evaluation and Mitigation Strategies -REMS
- 19 FDA. What's in a REMS?
- 20 FDA. <https://www.fda.gov/regulatory-information/search-fda-guidance-documents/dear-health-care-provider-letters-improving-communication-important-safety-information>
- 21 Singapore Health Sciences Authority of Singapore - Guide on SCAR
- 22 EMA. Guideline on good pharmacovigilance practices (GVP) Module XV. 2017
- 23 FDA. Guidance on Dear Health Care Provider Letter: Improving Communication of Important Safety Information

# APPENDIX 1.

## PRODUCT INFORMATION EXAMPLES

### Medicinal Product A

#### Product Label

##### 4.4. Special warnings and precautions for use

Hypersensitivity syndrome, SJS and TEN

Medicinal Product A should be withdrawn immediately when a skin rash or other evidence of sensitivity occurs as this could result in more serious hypersensitivity reactions, which can manifest in many different ways, including maculopapular exanthema, hypersensitivity syndrome (also known as DRESS) and SJS/TEN.

These reactions are clinical diagnoses, and their clinical presentations remain the basis for decision making. If such reactions occur at any time during treatment, Medicinal Product A should be withdrawn immediately. Rechallenge should not be undertaken in patients with DRESS and SJS/TEN. Corticosteroids may be beneficial in overcoming hypersensitivity skin reactions. Please see “Undesirable effects” table below.

##### 4.8. Undesirable effects

| System Organ Class                     | Frequency | Adverse Reaction                                     |
|--|-----------|--|
| Immune system disorders                | Uncommon  | Hypersensitivity reactions                           |
| Skin and subcutaneous tissue disorders | Common    | Rash   |
|  | Rare      | Stevens-Johnson Syndrome, Toxic Epidermal Necrolysis |
|  | Very rare | Fixed Drug Eruption                                  |

2. Serious hypersensitivity reactions, including skin reactions associated with exfoliation, fever, lymphadenopathy, arthralgia and/or eosinophilia including SJS and TEN occur rarely (see above table). Associated vasculitis and tissue response may be manifested in various ways including hepato-splenomegaly, hepatitis, vanishing bile duct syndrome (destruction and disappearance of the intrahepatic bile ducts), renal impairment and, very rarely, seizures. Other organs may also be affected (e.g. liver, lungs, kidneys, pancreas, myocardium, and colon). Very rarely acute anaphylactic shock has been reported. Such reactions may occur at any time during treatment. Medicinal Product A should be withdrawn immediately and permanently.

Rechallenge should not be undertaken in patients with hypersensitivity syndrome and SJS/TEN. Corticosteroids may be beneficial in overcoming hypersensitivity skin reactions. When generalized hypersensitivity reactions have occurred, renal and/or hepatic disorder has usually been present particularly when the outcome has been fatal. Corticosteroids may be beneficial in overcoming hypersensitivity skin reactions.

6. Skin reactions are the most common reactions and may occur at any time during treatment. They may be pruritic, maculopapular, sometimes scaly, sometimes purpuric and rarely exfoliative, such as SJS/TEN. The highest risk for SJS and TEN, or other serious hypersensitivity reactions, is within the first weeks of treatment.

The best results in managing such reactions come from early diagnosis and the immediate discontinuation of any suspect medicinal product. Medicinal Product A should be withdrawn immediately should such reactions occur.

After recovery from mild reactions, Product A may, if desired, be re-introduced at a small dose (e.g. 50 mg/day) and gradually increased. If the rash recurs, Medicinal Product A should be permanently withdrawn as more severe hypersensitivity may occur.

If SJS/TEN, or other serious hypersensitivity reactions cannot be ruled out, DO NOT re-introduce Medicinal Product A due to the potential for a severe or even fatal reaction. The clinical diagnosis of SJS/TEN remains the basis for decision making. If such reactions occur at any time during treatment, Medicinal Product A should be withdrawn immediately and permanently.

## Medicinal Product B

### Product Label

#### 4.4. Special warnings and precautions for use

##### Warnings

[...]

Patients and their relatives should be made aware of early toxic signs and symptoms indicative of a potential haematological problem, as well as symptoms of dermatological or hepatic reactions. If reactions such as fever, sore throat, rash, ulcers in the mouth, easy bruising, petechial or purpuric haemorrhage appear, the patient should be advised to consult the physician immediately.

Serious dermatological reactions, including toxic epidermal necrolysis (TEN: also known as Lyell's syndrome) and SJS have been reported very rarely with Medicinal Product B. Patients with serious dermatological reactions may require hospitalization, as these conditions may be life-threatening and fatal. Most SJS/TEN cases appear in the first few months of treatment with Medicinal Product B. These reactions are estimated to occur in 1 to 6 per 10,000 new users in countries with mainly Caucasian populations. If signs and symptoms suggestive of severe skin reactions (e.g. SJS, Lyell's syndrome/TEN) appear, Medicinal Product B should be withdrawn at once and alternative therapy should be considered.

[...]

##### Cutaneous reactions

Serious and sometimes fatal cutaneous reactions including TEN and SJS have been reported during treatment with Medicinal Product B. These reactions are estimated to occur in 1-6 per 10 000 new users in countries with mainly Caucasian populations, but the risk in some Asian countries is estimated to be about 10 times higher.

There is growing evidence of the role of different HLA alleles in predisposing patients to immune-mediated adverse reactions.

The *HLA-B\*1502* allele has not been found to predict risk of less severe adverse cutaneous reactions from Medicinal Product B, such as anticonvulsant hypersensitivity syndrome or non-serious rash (maculopapular eruption).

### Hypersensitivity

Medicinal Product B may trigger hypersensitivity reactions, including Drug Rash with Eosinophilia and Systemic Symptoms (DRESS), reactivation of HHV6 associated with DRESS, a delayed multi-organ hypersensitivity disorder with fever, rash, vasculitis, lymphadenopathy, pseudo lymphoma, arthralgia, leukopenia, eosinophilia, hepato-splenomegaly, abnormal liver function tests and vanishing bile duct syndrome (destruction and disappearance of the intrahepatic bile ducts), that may occur in various combinations. Other organs may also be affected (e.g. lungs, kidneys, pancreas, myocardium, colon).

In general, if signs and symptoms suggestive of hypersensitivity reactions occur, Medicinal Product B should be withdrawn immediately. Patients who have exhibited hypersensitivity reactions to Medicinal Product B should be informed that 25-30 % of these patients may experience hypersensitivity reactions with oxcarbazepine.

Cross-hypersensitivity can occur between Medicinal Product B and aromatic anti-epileptics (e.g. phenytoin, primidone and phenobarbital).

## 4.8. Undesirable effects

### Summary of the safety profile

Particularly at the start of treatment with Medicinal Product B, or if the initial dosage is too high, or when treating elderly patients, certain types of adverse reaction occur very commonly or commonly, e.g. CNS adverse reactions (dizziness, headache, ataxia, drowsiness, fatigue, diplopia), gastrointestinal disturbances (nausea, vomiting), as well as allergic skin reactions.

Tabulated summary of ADRs compiled from clinical trials and spontaneous reports

| System Organ Class                     | Frequency   | Adverse Reaction  |
|--|-------------|---|
| <b>Immune system disorders</b>         | Not known** | Drug Rash with Eosinophilia and Systemic Symptoms (DRESS) |
| <b>Skin and subcutaneous disorders</b> | Very rare   | Stevens-Johnson syndrome*, toxic epidermal necrolysis     |
|  | Not known** | Acute Generalized Exanthematous Pustulosis (AGEP)**       |

\* In some Asian countries also reported as rare. See also section 4.4 Special warnings and precautions for use.

\*\* Additional ADRs from spontaneous reports (frequency not known).

[...]

There is increasing evidence regarding the association of genetic markers and the occurrence of cutaneous ADRs such as SJS, TEN, DRESS, AGEP and maculopapular rash. In Japanese and European patients, these reactions have been reported to be associated with the use of Medicinal

Product B and the presence of the *HLA-A\*3101* allele. Another marker, *HLA-B\*1502* has been shown to be strongly associated with SJS and TEN among individuals of Han Chinese, Thai and some other Asian ancestry.

## Medicinal Product C

### Product Label

#### 4.4. Special warnings and precautions for use

[...]

##### Hypersensitivity

Hypersensitivity and allergic reactions, including anaphylaxis and anaphylactoid reactions, may occur following a single dose (see section 4.8) and may be life-threatening. If such reactions occur, Medicinal Product C should be discontinued and an adequate medical treatment is required.

[...]

#### 4.8. Undesirable effects

| System<br>Organ Class                           | Common | Uncommon | Rare | Very Rare  | Frequency not<br>known  |
|---|--------|----------|------|--|---|
| Skin and<br>Subcutaneous<br>Tissue<br>Disorders |        |          |      | Stevens-Johnson<br>syndrome (potentially<br>life-threatening)<br><br>Toxic epidermal<br>necrolysis (potentially<br>life-threatening) | Acute Generalized<br>Exanthematous<br>Pustulosis (AGEP)<br><br>Drug Reaction with<br>Eosinophilia and<br>Systemic Symptoms<br>(DRESS) |

## Medicinal Product D

### Product Label and Patient Information Leaflet

### Product Label

#### 4.4. Special warnings and precautions for use

##### Life threatening adverse reactions

Fatalities, although very rare, have occurred due to severe reactions including Stevens-Johnson syndrome, toxic epidermal necrolysis, fulminant hepatic necrosis, agranulocytosis, aplastic anaemia, other blood dyscrasias and hypersensitivity of the respiratory tract.

- ▶ Life-threatening cutaneous reactions SJS, TEN and DRESS have been reported with the use of Medicinal Product D.
- ▶ Patients should be advised of the signs and symptoms and monitored closely for skin reactions. The highest risk for occurrence of SJS or TEN is within the first weeks of treatment.
- ▶ If symptoms or signs of SJS, TEN (e.g. progressive skin rash often with blisters or mucosal lesions) or DRESS (e.g. fever, eosinophilia) are present, Medicinal Product D treatment should be discontinued.
- ▶ The best results in managing SJS, TEN and DRESS come from early diagnosis and immediate discontinuation of any suspect medicinal product. Early withdrawal is associated with a better prognosis.
- ▶ If the patient has developed SJS, TEN and DRESS with the use of Medicinal Product D, Medicinal Product D must not be re-started in this patient at any time.
- ▶ At the start of treatment, the occurrence of a generalized febrile erythema associated with pustules, should raise the suspicion of acute generalized exanthematous pustulosis (AGEP); it requires cessation of treatment and contraindicates any new administration of Medicinal Product D alone or in combination with other medicinal products.

[...]

#### 4.8. Undesirable effects

| System Organ Class                      | Frequency | Side effects   |
|---|-----------|--|
| Skin and subcutaneous tissue disorders* | Very rare | Stevens-Johnson syndrome (SJS) *, toxic epidermal necrolysis (TEN) *. Acute generalised exanthematous pustulosis (AGEP). |
|   | Not known | Acute febrile neutrophilic dermatosis (Sweet's syndrome), Drug reaction with eosinophilia and systemic symptoms (DRESS)* |

Description of selected adverse reactions

Severe cutaneous adverse reactions (SCAR)

Stevens-Johnson syndrome (SJS), toxic epidermal necrolysis (TEN) and drug reaction with eosinophilia and systemic symptoms (DRESS) have been reported to be life-threatening.

As with any other medicinal product, allergic reactions such as an itchy rash and hives may occur in patients with hypersensitivity to the components of the medicinal product. Very rare cases of AGEP have been observed.

Patient Information Leaflet (PIL):

2. What you need to know before you take Medicinal Product D

Warnings and precautions

Talk to your doctor or pharmacist before taking Medicinal Product D:

- ▶ If you have severe allergies or asthma.

- ▶ Potentially life-threatening skin rashes (SJS, TEN and DRESS) have been reported with the use of Medicinal Product D appearing initially as reddish target-like spots or circular patches often with central blisters on the trunk.
- ▶ At the start of treatment, the occurrence of generalized skin redness with pustules, accompanied by fever, should raise the suspicion of a serious reaction called acute generalized exanthematous pustulosis (AGEP) (see section 4).
- ▶ Additional signs to look for include ulcers in the mouth, throat, nose, genitals and conjunctivitis (red and swollen eyes).
- ▶ These potentially life-threatening skin rashes are often accompanied by flu-like symptoms. The rash may progress to widespread blistering or peeling of the skin.
- ▶ The highest risk for occurrence of serious skin reactions is within the first weeks of treatment.
- ▶ If you have developed Stevens-Johnson syndrome, toxic epidermal necrolysis or drug reaction with eosinophilia and systemic symptoms with the use of Medicinal Product D, you must not be re-started on Medicinal Product D at any time.
- ▶ If you develop a rash or these skin symptoms, stop taking Medicinal Product D, seek urgent advice from a doctor and tell him that you are taking this medicine.

#### 4. Possible side effects

Like all medicines, Medicinal Product D can cause side effects, although not everybody gets them. You may experience the following side effects with this medicine.

Stop taking Medicinal Product D and tell your doctor immediately if you have an allergic reaction. The chances of an allergic reaction are very rare (fewer than 1 in 10,000 people are affected), signs of an allergic reaction include:

##### Allergic reactions

- ▶ Difficulty breathing
- ▶ Fainting
- ▶ Swelling of face
- ▶ Swelling of mouth, tongue or throat which may be red and painful and/or cause difficulty in swallowing
- ▶ Chest pain
- ▶ Red patches on the skin

##### **Common** (less than 1 in 10 people)

- ▶ Skin rashes

##### **Very Rare** (less than 1 in 10,000 people)

- ▶ Potentially life-threatening skin rashes (SJS, TEN) have been reported
- ▶ Very rare cases of redness generalizing to the whole body (AGEP)
- ▶ Mouth ulcers, cold sores and ulcers or soreness of your tongue
- ▶ Skin lumps or hives (raised, red or white, itchy patches of skin)
- ▶ Blisters on your skin or inside your mouth, nose, vagina or bottom
- ▶ Inflammation of the eye, which causes pain and redness
- ▶ The appearance of a rash or sunburn when you have been outside (even on a cloudy day)

**Not known** (frequency cannot be estimated from the available data)

- ▶ Drug reaction with eosinophilia and systemic symptoms (an allergic type reaction in which you may develop fever, skin rash, and abnormalities in blood and liver function tests (these may be signs of a multi-organ sensitivity disorder).

If any of the side effects get serious, or if you notice any side effects not listed in this leaflet, please tell your doctor or pharmacist.

## Medicinal Product E

Additional Risk Minimization Measures: Healthcare Professional Guide and Patient Card

Medicinal Product E hypersensitivity reaction is a delayed hypersensitivity reaction mediated via CD8+ T lymphocytes and strongly associated with the presence of the *HLA-B\*57:01* allele.<sup>[1]</sup> This reaction is multi-systemic and typically presents with fever, rash, constitutional symptoms and gastrointestinal manifestations,<sup>[2]</sup> occurring usually within the first six weeks of treatment with Medicinal Product E. Upon diagnosis, treatment discontinuation is mandatory and subsequent treatment with Medicinal Product E is contraindicated, since it can result in a more severe, rapid, and potentially life-threatening reaction.<sup>[3]</sup>

In 2002, the association between the MHC class I *HLA-B\*57:01* allele and a risk for Medicinal Product E hypersensitivity was described for the first time.<sup>[1,3]</sup> The prevalence of this allele varies according to the predominant populations of the geographic location, with an estimated prevalence of 5%-8% in predominantly Caucasian populations, 2-3 % in African Americans and < 1% in Sub-Saharan Africa, Chinese and Japanese populations.<sup>[4,5]</sup> Based on this demonstrated association and supported by the test's comparatively high PPV for this outcome,<sup>[3]</sup> *HLA-B\*57:01* testing prior to initiating treatment with Medicinal Product E, was recommended in the label. Subsequently, this test became part of the regulatory terms of marketing authorization and standard of care for HIV patients before initiating treatment with Medicinal Product E.

Because of the potential severity, seriousness, outcomes and consequent impact on treatment, Medicinal Product E hypersensitivity reaction is classified as an important identified risk for the medicinal product.

Both routine risk minimization measures and additional risk minimization measures are in place to prevent the risk of Medicinal Product E hypersensitivity in patients who test positive for this allele, and subsequently reduce undue exposure. The main guidance around HLA screening is provided in the product's label (i.e., "*HLA-B\*5701* status must always be documented prior to initiating therapy"), but additional risk minimization measures have also been put in place to ensure awareness of the potentially life-threatening risk, and the recommended HLA screening to identify patients who may be at risk. These measures include a Healthcare Professional Guide for HCPs and a patient card for patients in the EU. In the U.S., the manufacturer of Medicinal Product E was required to distribute a Medication Guide to patients, as part of a REMS program, until 2011 when the REMS and Medication Guide were no longer required.

# Patient Card

## SIDE 1

IMPORTANT - ALERT CARD  
 Medicinal Product E tablets  
 Carry this card with you at all times

Since TRADENAME 1 contains Medicinal Product E some patients taking TRADENAME 1 may develop a hypersensitivity reaction (serious allergic reaction) which can be life-threatening if treatment with Medicinal Product E is continued.

## CONTACT YOUR DOCTOR

**IMMEDIATELY for advice on whether you should stop taking TRADENAME 1 if:**

**1) you get a skin rash OR**

**2) you get one or more symptoms from at least TWO of the following groups**

- fever
- shortness of breath, sore throat or cough
- nausea or vomiting or diarrhoea or abdominal pain
- severe tiredness or achiness or generally feeling ill

If you have discontinued TRADENAME 1 due to this reaction, YOU MUST NEVER TAKE TRADENAME 1 or any other Medicinal Product E containing medicine (e.g. TRADENAME 2, TRADENAME 3 or TRADENAME 4) again, as within hours you may experience a life-threatening lowering of your blood pressure or death.

(see reverse of card)

## SIDE 2

You should immediately contact your doctor if you think you are having a hypersensitivity reaction to

Medicinal Product E. Write your doctor's details below:

Doctor: ..... Tel: .....

If your doctor is not available, you must urgently seek alternative medical advice (e.g. the emergency unit of the nearest hospital).

For general Medicinal Product E information enquiries, contact Manufacturer .....  
 Tel..... (local company name and telephone number will be inserted here).

## Medicinal Product F

Cases of SJS and TEN were reported in patients treated with Medicinal Product F. The regulatory authority and the manufacturer agreed that a Dear Healthcare Professional Communication (DHPC), previously considered an additional risk minimization measure was necessary to be disseminated to HCPs to ensure awareness of the newly identified risk of SCAR. The content of the DHPC included a background on the safety concern, summary of the findings, recommendations on treatment interruption and discontinuation (see below). Lastly, the DHPC included instructions on reporting suspected adverse reactions to the regulatory authority or the manufacturer.

### Dear Healthcare Professional Communication

#### **Medicinal Product F: Risk of Severe Cutaneous Adverse Reactions (SCARs)**

Dear Healthcare professional,

The Manufacturer of Medicinal Product F would like to inform you of the following:

##### *Summary*

- ▶ Severe cutaneous adverse reactions (SCARs), including cases of Stevens-Johnson syndrome (SJS) and toxic epidermal necrolysis (TEN), have been reported in patients treated with Medicinal Product F.
- ▶ Patients should be monitored for suspected severe skin reactions and other causes should be excluded. In case a SCAR is suspected, Medicinal Product F should be withheld and patients should be referred to a specialist in SCARs for diagnosis and treatment.
- ▶ In case SJS or TEN is confirmed, and for any grade 4 rash/SCAR, treatment with Medicinal Product F should be permanently discontinued.
- ▶ Caution is recommended when considering the use of Medicinal Product F in patients with previous history of a severe or life-threatening SCAR with other immune-stimulatory cancer medicines.

##### *Background on the safety concern*

SCARs are a heterogeneous group of immunologically mediated drug eruptions. Although rare, these events are potentially fatal, and are mainly constituted by acute generalised exanthematous pustulosis (AGEP), Stevens-Johnson syndrome (SJS), toxic epidermal necrolysis (TEN) and drug rash with eosinophilia and systemic symptoms (DRESS).

SCARs were previously known to be potentially associated with the use of Medicinal Product F, and have been monitored continuously. Based upon the totality of evidence in a recent analysis, SCARs are now considered to be an identified risk for Medicinal Product F.

A cumulative analysis of the company safety database across the Medicinal Product F program identified X cases, of which X cases of SCARs were confirmed by histopathology or specialist diagnosis, in patients who have received Medicinal Product F. Approximately X clinical trial patients and X patients in post-marketing settings have been exposed to the product as of Day Month Year. The incidence rates of SCAR, regardless of severity, from pooled Medicinal Product F monotherapy (N=X) and combination therapy (N=X) in company-sponsored clinical studies was X% and X% respectively. This included one fatal case who received Medicinal Product F monotherapy.

It is recommended that:

- ▶ For suspected SCARs the patients should be referred to a dermatologist for further diagnosis and management
- ▶ Medicinal Product F should be withheld in patients with suspected SJS or TEN
- ▶ Medicinal Product F should be permanently withdrawn for confirmed SJS or TEN, and for any grade 4 rash/SCAR
- ▶ Caution should be used when considering the use of Medicinal Product F in a patient who has previously experienced a severe or life-threatening skin adverse reaction on prior treatment with other immune-stimulatory anticancer agents.

An update to the Product Information to include a Warning and Precaution for SCARs, guidelines for discontinuation and further description of the risk will be implemented shortly.

## Appendix 1 – References

- 1 Mallal S, et al. Association between presence of HLAB\*5701, HLA-DR7, and HLA-DQ3 and hypersensitivity to HIV-1 reverse-transcriptase inhibitor abacavir. *The Lancet*. 2002 Mar 2;359(9308):727-32. [PubMed Abstract](#)
- 2 Peter JG, et al. Severe Delayed Cutaneous and Systemic Reactions to Drugs: A Global Perspective on the Science and Art of Current Practice. *J Allergy Clin Immunol Pract*. May-Jun 2017;5(3):547-563 [PubMed Abstract](#)
- 3 Mallal S, et al. HLAB\*5701 Screening for hypersensitivity to abacavir. *N Engl J Med*. 2008 Feb 7;358(6):568-79. [PubMed Abstract](#)
- 4 Phillips, et al. Genetic Screening to Prevent Abacavir Hypersensitivity Reaction: Are We There Yet?. *Clin Infect Dis*. 2006 Jul 1;43(1):103-5. [Journal Article](#)
- 5 Zhang, et al. Low prevalence of human leukocyte antigen-B\*5701 in HIV-1-infected Chinese subjects: a prospective epidemiological investigation. *AIDS Res Ther*. 2015; 12: 28. [PubMed Abstract](#)

## APPENDIX 2.

# EXAMPLES OF TARGETED FOLLOW-UP FORMS TO BE USED FOR ALL SCAR REPORTS

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### Follow-up questionnaires

1. Extent of the rash:
  - $\geq 50\%$  of body surface area
  - 30~50% of body surface area
  - $< 30\%$  of body surface area
2. Did the subject undergo skin biopsy?
  - Yes → the responder is asked to enter the result.
  - No
3. Has the subject had facial swelling? (i.e., facial swelling during the event of rash)
  - Yes
  - No
  - Unknown
4. Has the subject had enlarged lymph nodes? (Presence of either localized [e.g. cervical, axillary, or inguinal lymph nodes] or generalised lymphadenopathy)
  - Yes
  - No
  - Unknown
5. Were atypical lymphocytes detected at some point during the evolution of the hypersensitivity event?
  - Yes
  - No
6. Did the subject have eosinophilia ( $> 0.5 \times 10^9/l$  or  $500/\mu L$ ) detected at some point during the evolution of the hypersensitivity event?
  - Yes
  - No

7. Have infectious causes been excluded? Has an infection screening been conducted due to the events of fever + rash (e.g. blood count, CRP, blood culture, chest X-ray, urinalysis + urine culture)?
- Yes
    - Description of which tests:
  - No
  - Unknown
8. Did the subject have evidence of internal organ involvement? Select in case there is evidence of other organs being affected concomitantly to the event of rash, resulting in liver, renal, cardiac, or pulmonary function alteration:
- Yes. If positive, select all that apply:
    - AST/ALT increase
    - Renal involvement (creatinine and/or BUN increase, urinalysis alteration)
    - Cardiac involvement (clinical, laboratory or echocardiographic evidence of myocarditis)
    - Lung involvement (clinical or radiological evidence of pneumonitis)
    - Other
  - No
  - Unknown
9. Concomitant medications

|  |   |  |   |
|--|---|--|---|
| <b>Severe Cutaneous Adverse Reactions (SCARs)</b><br><b>PRODUCT XX follow-up: Relevant information to confirm the diagnosis</b>  | 1. Identification no/ Country                   | RELEVANT<br><input type="checkbox"/> No <input type="checkbox"/> Yes   | 3. Date of this report:   |
|  | 4. CLINICAL TRIAL<br>Protocol no:<br>Centre no: | Patient no:  | 5. REPORTER<br>NAME:<br>Address:<br>Tel.:<br>Dermatologist: <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
| <b>I. THE PATIENT</b>  |   |  |   |
| 6. INITIALS (first, last):   | 7. SEX:   | 8. AGE:  | 9. WEIGHT:  |
| 10. RELEVANT OCCUPATION:   | 11. COUNTRY OF ORIGIN:                          |  | 12. OTHER:  |
| 13. PREVIOUS RELEVANT HISTORY AND CONCURRENT DISORDERS:  |   |  |   |
| No Yes Specify:<br>Skin diseases <input type="checkbox"/> <input type="checkbox"/><br>Other diseases <input type="checkbox"/> <input type="checkbox"/>   |   | Allergic reactions <input type="checkbox"/><br>To what drug?<br>Asthma <input type="checkbox"/>  | Specify:<br><br>Allergic rhinitis <input type="checkbox"/> Atopic dermatitis <input type="checkbox"/>                   |
| <b>II. THE ADVERSE REACTION (continue overleaf if necessary)</b>   |   |  | <b>III. SUSPECTED DRUG</b>  |
| 14. DATE OF ONSET  |   | 15. ASSOCIATED SYMPTOMS  |   |
| 16. Diagnosis - type of skin disorder<br><input type="checkbox"/> Stevens-Johnson syndrome (SJS)<br><input type="checkbox"/> Toxic Epidermal Necrolysis (TEN)<br><input type="checkbox"/> Erythema multiforme<br><input type="checkbox"/> Drug reaction with eosinophilia and systemic symptoms (DRESS)<br><input type="checkbox"/> Acute Generalised Exanthematous Pustulosis (AGEP)<br><input type="checkbox"/> Generalized Bullous Fixed Drug Eruption (GBFDE)<br><input type="checkbox"/> Other:<br><br>Type of skin disorder:<br><input type="checkbox"/> Macular or maculopapular rash<br><input type="checkbox"/> Scarletiform rash<br><input type="checkbox"/> Exfoliative dermatitis<br><input type="checkbox"/> Bullous or vesiculous eruption<br><input type="checkbox"/> Purpura (platelet count needed)<br><input type="checkbox"/> palpable purpura <input type="checkbox"/> necrotic purpura<br><input type="checkbox"/> Visceral involvement:<br><input type="checkbox"/> Kidney <input type="checkbox"/> GI tract <input type="checkbox"/> Nerves<br><input type="checkbox"/> Others: |   | <input type="checkbox"/> Pruritus<br><input type="checkbox"/> Contact dermatitis or eczematiform eruption<br><input type="checkbox"/> Urticaria<br><input type="checkbox"/> Cutaneous angioedema<br><input type="checkbox"/> Mucosal angioedema<br><input type="checkbox"/> Burning or pain<br><input type="checkbox"/> Oozing<br><input type="checkbox"/> Edema<br><input type="checkbox"/> Infection<br><input type="checkbox"/> Fever<br><input type="checkbox"/> Arthralgia/myalgia<br><input type="checkbox"/> Nodes enlargement<br>Associated signs: <input type="checkbox"/> Dyspnea<br><input type="checkbox"/> Tachycardia<br><input type="checkbox"/> Hypotension<br><input type="checkbox"/> Anaphylactic shock<br><input type="checkbox"/> Others skin disorders, (specify): |   |
|  |   | 23. Name<br><br>24. Indication<br><br>25. Daily dose<br><br>26. Route<br><br>27. Date beginning<br><br>28. Date end<br><br>29. Duration  |   |
| Were photographs taken? <input type="checkbox"/> No <input type="checkbox"/> Yes   |   | 30. ADMINISTRATION OF THIS DRUG AFTER THE BEGINNING OF THE REACTION<br><input type="checkbox"/> Stopped<br><input type="checkbox"/> Continued (same dose)<br><input type="checkbox"/> Reduced dose<br><input type="checkbox"/> Other:  |   |
| 17. DISTRIBUTION OF LESIONS <input type="checkbox"/> localized <input type="checkbox"/> disseminated<br>Number of lesions <input type="checkbox"/> < 10 <input type="checkbox"/> 10 to 30 <input type="checkbox"/> >30 main location:<br><input type="checkbox"/> Mucosal lesions, specify:<br><input type="checkbox"/> Nail/hair lesions, specify:  |   | 31. IMMEDIATE RESULT<br><input type="checkbox"/> Improvement <input type="checkbox"/> No change<br><input type="checkbox"/> Aggravation <input type="checkbox"/> Uninterpretable   |   |
| 18. Viral infection<br><input type="checkbox"/> Viral infection, specify:  |   | Evidence for viral infection: No Yes Not done<br>EBV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>Hepatitis B virus <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>CMV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HSV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HHV-6 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HHV-7 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HIV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>Others:   |   |
| 19. IS PHOTOSENSITIVITY SUSPECTED?<br>Localization of lesion:<br><input type="checkbox"/> Face <input type="checkbox"/> Neck <input type="checkbox"/> Hands/forearms<br><input type="checkbox"/> Legs/feet <input type="checkbox"/> Other specify?<br>Intensity of solar exposition:<br><input type="checkbox"/> High <input type="checkbox"/> Low   |   | 32. READMINISTRATION OF THE DRUG<br><input type="checkbox"/> No <input type="checkbox"/> Yes<br>Dose: Date:<br>And if yes:<br><br>33. RECURRENCE OF THE REACTION<br><input type="checkbox"/> No <input type="checkbox"/> Yes<br><input type="checkbox"/> Uninterpretable   |   |
| 20. LABORATORY DATA<br>Leucocytes:<br>PMNs: %  |   | 34. PREVIOUS THERAPY WITH THE SAME DRUG<br><input type="checkbox"/> No <input type="checkbox"/> Yes, date:<br>Safety issues:   |   |
|  |   | 22. OUTCOME<br>(tick more than one box if necessary)<br><input type="checkbox"/> No hospitalization <input type="checkbox"/> Death Date:<br>Cause:   |   |

|  |   |  |   |
|--|---|--|---|
| <p style="text-align: center;"><b>Severe Cutaneous Adverse Reactions (SCARs)</b></p> <p style="text-align: center;"><b>PRODUCT XX follow-up: Relevant information to confirm the diagnosis</b></p>   | 1. Identification no/ Country                   | RELEVANT   | 3. Date of this report:   |
|  | 4. CLINICAL TRIAL<br>Protocol no:<br>Centre no: | <input type="checkbox"/> No <input type="checkbox"/> Yes<br>Patient no:  | 5. REPORTER<br>NAME:<br>Address:<br>Tel.:<br>Dermatologist: <input type="checkbox"/> Yes<br><input type="checkbox"/> No |
| <b>I. THE PATIENT</b>  |   |  |   |
| 6. INITIALS (first, last):   | 7. SEX:   | 8. AGE:  | 9. WEIGHT:  |
| 10. RELEVANT OCCUPATION:   | 11. COUNTRY OF ORIGIN:                          |  | 12. OTHER:  |
| 13. PREVIOUS RELEVANT HISTORY AND CONCURRENT DISORDERS:  |   |  |   |
| No Yes Specify:<br>Skin diseases <input type="checkbox"/> <input type="checkbox"/><br>Other diseases <input type="checkbox"/> <input type="checkbox"/>   |   | Allergic reactions <input type="checkbox"/><br>To what drug?<br>Asthma <input type="checkbox"/>  | Specify:<br><br>Allergic rhinitis <input type="checkbox"/> Atopic dermatitis <input type="checkbox"/>                   |
| <b>II. THE ADVERSE REACTION (continue overleaf if necessary)</b>   |   |  | <b>III. SUSPECTED DRUG</b>  |
| 14. DATE OF ONSET  |   | 15. ASSOCIATED SYMPTOMS  |   |
| 16. Diagnosis - type of skin disorder<br><input type="checkbox"/> Stevens-Johnson syndrome (SJS)<br><input type="checkbox"/> Toxic Epidermal Necrolysis (TEN)<br><input type="checkbox"/> Erythema multiforme<br><input type="checkbox"/> Drug reaction with eosinophilia and systemic symptoms (DRESS)<br><input type="checkbox"/> Acute Generalised Exanthematous Pustulosis (AGEP)<br><input type="checkbox"/> Generalized Bullous Fixed Drug Eruption (GBFDE)<br><input type="checkbox"/> Other:<br><br>Type of skin disorder:<br><input type="checkbox"/> Macular or maculopapular rash<br><input type="checkbox"/> Scarlatiniform rash<br><input type="checkbox"/> Exfoliative dermatitis<br><input type="checkbox"/> Bullous or vesiculous eruption<br><input type="checkbox"/> Purpura (platelet count needed)<br><input type="checkbox"/> palpable purpura <input type="checkbox"/> necrotic purpura<br><input type="checkbox"/> Visceral involvement:<br><input type="checkbox"/> Kidney <input type="checkbox"/> GI tract <input type="checkbox"/> Nerves<br><input type="checkbox"/> Others: |   | <input type="checkbox"/> Pruritus<br><br><input type="checkbox"/> Contact dermatitis or eczematiform eruption<br><input type="checkbox"/> Urticaria<br><input type="checkbox"/> Cutaneous angioedema<br><input type="checkbox"/> Mucosal angioedema<br><input type="checkbox"/> Burning or pain<br><input type="checkbox"/> Oozing<br><input type="checkbox"/> Edema<br><input type="checkbox"/> Infection<br><input type="checkbox"/> Fever<br><input type="checkbox"/> Arthralgia/myalgia<br><input type="checkbox"/> Nodes enlargement<br>Associated signs: <input type="checkbox"/> Dyspnea<br><input type="checkbox"/> Tachycardia<br><input type="checkbox"/> Hypotension<br><input type="checkbox"/> Anaphylactic shock<br><br><input type="checkbox"/> Others skin disorders, (specify): |   |
|  |   | 23. Name<br><br>24. Indication<br><br>25. Daily dose<br><br>26. Route<br><br>27. Date beginning<br><br>28. Date end<br><br>29. Duration  |   |
| Were photographs taken? <input type="checkbox"/> No <input type="checkbox"/> Yes   |   | 30. ADMINISTRATION OF THIS DRUG AFTER THE BEGINNING OF THE REACTION<br><input type="checkbox"/> Stopped<br><input type="checkbox"/> Continued (same dose)<br><input type="checkbox"/> Reduced dose<br><input type="checkbox"/> Other:  |   |
| 17. DISTRIBUTION OF LESIONS <input type="checkbox"/> localized <input type="checkbox"/> disseminated<br>Number of lesions <input type="checkbox"/> < 10 <input type="checkbox"/> 10 to 30 <input type="checkbox"/> >30 main location:<br><input type="checkbox"/> Mucosal lesions, specify:<br><input type="checkbox"/> Nail/hair lesions, specify:  |   | 31. IMMEDIATE RESULT<br><input type="checkbox"/> Improvement <input type="checkbox"/> No change<br><input type="checkbox"/> Aggravation <input type="checkbox"/> Uninterpretable   |   |
| 18. Viral infection<br><input type="checkbox"/> Viral infection, specify:  |   | Evidence for viral infection: No Yes Not done<br>EBV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>Hepatitis B virus <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>CMV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HSV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HHV-6 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HHV-7 <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>HIV <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/><br>Others:   |   |
| 19. IS PHOTOSENSITIVITY SUSPECTED?<br>Localization of lesion:<br><input type="checkbox"/> Face <input type="checkbox"/> Neck <input type="checkbox"/> Hands/forearms<br><input type="checkbox"/> Legs/feet <input type="checkbox"/> Other specify?<br>Intensity of solar exposition:<br><input type="checkbox"/> High <input type="checkbox"/> Low   |   | 32. READMINISTRATION OF THE DRUG<br><input type="checkbox"/> No <input type="checkbox"/> Yes<br>Dose: Date:<br>And if yes:<br><br>33. RECURRENCE OF THE REACTION<br><input type="checkbox"/> No <input type="checkbox"/> Yes<br><input type="checkbox"/> Uninterpretable   |   |
| 20. LABORATORY DATA<br>Leucocytes:<br>PMNs: %  |   | 34. PREVIOUS THERAPY WITH THE SAME DRUG<br><input type="checkbox"/> No <input type="checkbox"/> Yes, date:<br>Safety issues:   |   |
| SKIN BIOPSY <input type="checkbox"/> No <input type="checkbox"/> Yes<br>Result (attach report)   |   | 22. OUTCOME<br>(tick more than one box if necessary)<br><input type="checkbox"/> No hospitalization <input type="checkbox"/> Death Date:<br>Cause:   |   |

## APPENDIX 3. SCAR WORKING GROUP MEMBERS AND MEETINGS

The CIOMS Working Group on Severe Cutaneous Adverse Reactions included the following stakeholder groups: clinicians, international organizations, pharmaceutical industry, regulatory authorities.

| CLINICIANS         |  |  |
|--------------------|--|--|
| Name               | Company/Organization                           | Country                                  |
| Chia-Yu Chu        | National Taiwan University Hospital            | Chinese Taipei<br>Working Group Co-Chair |
| Siew Eng Choon     | Monash University                              | Malaysia                                 |
| Roni P. Dodiuk-Gad | Emek Medical Center                            | Israel                                   |
| Koji Hashimoto     | Ehime Prefectural University of Health Science | Japan                                    |
| Haur Yueh Lee      | Singapore General Hospital                     | Singapore                                |
| Filippa Nyberg     | Karolinska University Hospital                 | Sweden                                   |
| Neil Shear         | University of Toronto                          | Canada                                   |

| INTERNATIONAL ORGANIZATIONS |   |             |
|-----------------------------|---|-------------|
| Name                        | Company/Organization                        | Country     |
| Matt Doogue                 | IUPHAR/University of Otago/<br>Christchurch | New Zealand |

| PHARMACEUTICAL INDUSTRY |                      |             |
|-------------------------|----------------------|-------------|
| Name                    | Company/Organization | Country     |
| David Brott             | Takeda               | USA         |
| Leslie Dondey-Nouvel    | Sanofi               | France      |
| Alexandre Kiazand       | AstraZeneca          | USA         |
| Gerd Kullak-Ublick *    | Novartis             | Switzerland |
| Ariel R. Porcalla       | AbbVie               | USA         |
| Violeta Regnier Galvao  | Eli Lilly            | USA         |
| Sarah Schlieff          | Bayer                | Germany     |

| REGULATORY AUTHORITIES |  |                               |
|------------------------|--|-------------------------------|
| Name                   | Company/Organization                             | Country                       |
| Melissa Reyes          | FDA  | USA<br>Working Group Co Chair |
| Priya Bahri            | EMA  | Netherlands                   |
| Michael A. Pacanowski  | FDA  | USA                           |
| Youssef Roman          | FDA  | USA                           |
| Sabine Straus          | Medicines Evaluation Board                       | Netherlands                   |
| Tien M. Truong         | FDA  | USA                           |
| Takahiro Ueda          | Pharmaceutical and Medical Devices Agency (PMDA) | Japan                         |

\*Alternate: Sylvia Lesperance, Novartis

| CIOMS          |                   |             |
|----------------|-------------------|-------------|
| Name           | Function          | Country     |
| Hervé Le Louët | President         | Switzerland |
| Lembit Rägo    | Secretary General | Switzerland |

The Working Group met in a series of virtual meetings from 2021 to 2023 as follows:

1. 2-3 February 2021
2. 13 April 2021
3. 29 June 2021
4. 7 October 2021
5. 13 December 2021
6. 9 May 2022
7. 12 September 2022
8. 12 December 2022
9. 14 March 2023
10. 20 June 2023

The SCAR Working Group Editorial Team met three times in 2023 and once, in 2024, and included the following members:

| Name              | Company/Organization                | Country        |
|-------------------|-------------------------------------|----------------|
| Siew Eng Choon    | Monash University                   | Malaysia       |
| Chia-Yu Chu       | National Taiwan University Hospital | Chinese Taipei |
| Alexandre Kiazand | Astra Zeneca                        | USA            |
| Haur Yueh Lee     | Singapore General Hospital          | Singapore      |
| Sylvia Lesperance | Novartis                            | Switzerland    |
| Lembit Rägo       | CIOMS                               | Switzerland    |
| Melissa Reyes     | FDA                                 | USA            |

## APPENDIX 4. LIST OF COMMENTERS

| Name   | Company/Organisation  | Country                               |
|--|---|---------------------------------------|
| Ismael Alvarez<br>Alvarez/M. Isabel<br>Lucena                    | Instituto de Investigación Biomédica de Málaga<br>y Plataforma en Nanomedicina (IBIMA)<br>Plataforma BIONAND        | University of<br>Málaga, Spain        |
| Mark Avigan  | U.S. FDA  |                                       |
| Negar Babae/Jaap<br>Fransen                                      | Medicine Evaluation Board   | The Netherlands                       |
| Elsie Lynn Baronia -<br>Locson                                   | National children's hospital institutional review<br>board  | Philippines                           |
| Ghania Chamouni  | Kenvue  | France                                |
| Chun-Bing Chen   | Department of Dermatology,<br>Drug Hypersensitivity Clinical and Research<br>Center<br>Chang Gung Memorial Hospital | Linkou, Chinese<br>Taipei             |
| Maria Chouiyakh  | Mohammed V University   | Morocco                               |
| Tan-Koi Wei Chuen<br>Assistant Professor                         | Lead, Regulatory System Strengthening, Centre<br>of Regulatory Excellence (CoRE)                                    | Duke-NUS Medical<br>School, Singapore |
| Kelly Diegel   | GSK   | USA                                   |
| Angelika Joos<br>Executive Director,<br>Global Regulatory Policy | Global Regulatory Affairs and Clinical Safety<br>MSD  | Belgium                               |
| John Kelly   | GSK   | USA                                   |
| Walter Straus  | Moderna   | USA                                   |
| Juergen Zorn   | Clinical Safety Therapeutic Area Head<br>Hematology<br>CSL Behring  | Germany                               |





The skin is among the parts of the body most commonly affected by adverse drug reactions (ADRs). Cutaneous ADRs affect 2% to 3% of all hospitalized patients and have a wide spectrum of clinical manifestations, are caused by various medicinal products, and result from different pathophysiologic mechanisms. Hence, their diagnosis and management are challenging. However, approximately 0.1% to 1% of patients with medicinal product eruptions have serious ADRs which can lead to disabling sequelae and in some cases, fatalities. Although Severe Cutaneous Adverse Reactions (SCAR) are rare, they are a significant health challenge and hinder the safe and effective use of medicines. In short, they pose substantial hurdles to drug developers, medicines regulators and health professionals.

SCAR include Stevens-Johnson syndrome (SJS), toxic epidermal necrolysis (TEN), drug reaction with eosinophilia and systemic symptoms (DRESS), acute generalized exanthematous pustulosis (AGEP), and generalized bullous fixed drug eruptions (GBFDE).

Premarketing randomized clinical trials have limited power to detect SCAR. There is also a lack of specific diagnostic tests for SCAR, which today, depend on subjective causality assessment methods. These factors highlight the urgent need for guidelines, including how to predict, prevent, detect and diagnose SCAR either during drug development or in the post-marketing phase.

In clinical practice, there is mounting concern about the burden of SCAR in relation to novel biologics as well as the increasing cost of diagnosis and management. This consensus report provides unique insights and the latest thinking from renowned experts on this important topic.

Severe Cutaneous Adverse Reactions (SCAR). A consensus by a CIOMS Working Group. Geneva, Switzerland: Council for International Organizations of Medical Sciences (CIOMS), 2025.

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