

label (221), or a combination of drugs that is not on the label (222).

Populations that are commonly underserved by FDA-approved medicines include cancer patients, children, and pregnant women (223). For many cancers, such as rare tumors, there may never be enough evidence to support a labeling indication because of the inability to conduct the appropriate trial as a result of inadequate patient numbers (224). Another factor that impairs the ability to recruit subjects for off-label uses is as follows. Patients are reluctant to participate in a randomization process that only provides investigational treatment to some patients, especially when the drug is already widely available (225).

Cost is another factor that encourages off-label use. This example is for antibody drugs (ranibizumab; bevacizumab) that are effective for treating a disease of the eye, age-related macular degeneration. Both drugs bind to a growth factor, VEGF. Ranibizumab has been FDA-approved for macular degeneration (226).

Bevacizumab has been FDA-approved for cancer treatment (227,228), but not for macular degeneration. According to Schmucker et al. (229), “[t]he costs of ranibizumab, however, are immense.” The cost of bevacizumab is 40 times lower. Both drugs have similar efficacy against macular degeneration (230). Unfortunately, bevacizumab has increased safety risks. Schmucker concluded that if the, “higher rates of adverse effects [for bevacizumab] are subsequently confirmed to be higher in bevacizumab than in ranibizumab, some of the cost savings with bevacizumab may be negated” (231).

Yet another factor that enhances the prevalence of off-label use, and impairs utilization of the FDA-approval process where the result is an FDA-approved package label, is the following. This factor is expiration of the patent for the drug (232). In other words, if a patent that covers a specific drug has already expired, a pharmaceutical company would have little incentive to spend a million dollars on a

²²¹Conti RM, et al. Prevalence of off-label use and spending in 2010 among patent-protected chemotherapies in a population-based cohort of medical oncologists. 2013;31:1134–9.

²²²Perrone F, et al. Tackling off-label use of anticancer drugs. *J. Clin. Oncol.* 2012;30:2800–2.

²²³Radley DC, et al. Off-label prescribing among office-based physicians. *Arch. Intern. Med.* 2006;166:1021–6.

²²⁴Krzyzanowska MK. Off-label use of cancer drugs: a benchmark is established. *J. Clin. Oncol.* 2013;31:1125–7.

²²⁵Mullins CD, et al. Recommendations for clinical trials of off-label drugs used to treat advanced-stage cancer. *J. Clin. Oncol.* 2012;30:661–6.

²²⁶Package insert. Lucentis[®] (ranibizumab injection) intravitreal injection; February 2015. 20 pp.

²²⁷Suh DH, et al. Major clinical research advances in gynecologic cancer in 2014. *J. Gynecol. Oncol.* 2015;26:156–67.

²²⁸Conti RM, et al. The impact of emerging safety and effectiveness evidence on the use of physician-administered drugs: the case of bevacizumab for breast cancer. *Med. Care.* 2013;51:622–7.

²²⁹Schmucker C, et al. A safety review and meta-analyses of bevacizumab and ranibizumab: off-label versus gold standard. *PLoS One.* 2012;7:e42701 (15 pp.).

²³⁰CATT Research Group. Ranibizumab and bevacizumab for neovascular age-related macular degeneration. *New Engl. J. Med.* 2011;364:1897–908.

²³¹Schmucker C, et al. A safety review and meta-analyses of bevacizumab and ranibizumab: off-label versus gold standard. *PLoS One.* 2012;7:e42701 (15 pp.).

²³²Pfister DG. Off-label use of oncology drugs: the need for more data and then some. *J. Clin. Oncol.* 2012;30:584–6.