

Understanding Current Use of Ketamine for Emerging Areas of Therapeutic Interest

The public meeting will begin shortly

Thursday, June 27, 2024

9 am – 4 pm Eastern Time

Funding Disclosure: This activity is one part of a multi-part Foundation project related to substance use disorder. The multi-part project is supported by the Food and Drug Administration (FDA) of the U.S. Department of Health and Human Services (HHS) as part of an overall award of \$1,720,109 of federal funds (100% of the project). The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by FDA, HHS, or the U.S. Government. For more information, please visit [FDA.gov](https://www.fda.gov).





Welcome

Susan C. Winckler, RPh, Esq.

Chief Executive Officer

Reagan-Udall Foundation for the FDA

Hybrid Meeting



Joining online:

Microphone and video will remain off during the meeting
Share your questions using the Zoom Q&A function



Joining in-person:

Please write your questions on the index cards provided



This public meeting is being recorded

The slides, transcript, and video will be available at www.ReaganUdall.org

Today's Agenda (Eastern Time)



- 9 am** Welcome & Opening Remarks
- 9:10 am** Session 1: Overview of the Changing Ketamine Landscape
- 9:30 am** Session 2: Scope of the ketamine Use in Clinical Practice
- 11 am** Break
- 11:10 am** Session 3: Identifying Safety Concerns and Potential Risks Associated with the Use of Ketamine Products
- 12:05 pm** Lunch

Today's Agenda (Eastern Time)



- 1:15 pm** Session 4: Policy and Regulatory Challenges for the Medical Use of Ketamine
- 2:15 pm** Session 5: Online Promotion and Access to Ketamine
- 3 pm** Break
- 3:10 pm** Session 6: Potential Future Use of Ketamine
- 4 pm** Closing Remarks & Adjourn



Opening Remarks

Marta Sokolowska, PhD

Deputy Center Director for Substance Use and
Behavioral Health

Center for Drug Evaluation and Research
U.S. Food and Drug Administration

Overview of the Changing Ketamine Landscape



Gerard Sanacora, MD, PhD
Yale University



Overview of the Changing Ketamine Landscape

Gerard Sanacora, M.D., Ph.D.

George D. Gross and Esther S. Gross Professor of Psychiatry,

Yale University School of Medicine

Director Yale Depression Research Program

Co-Director Yale New Haven Hospital Interventional Psychiatry

Service



Disclosures



The Yale School
of Medicine

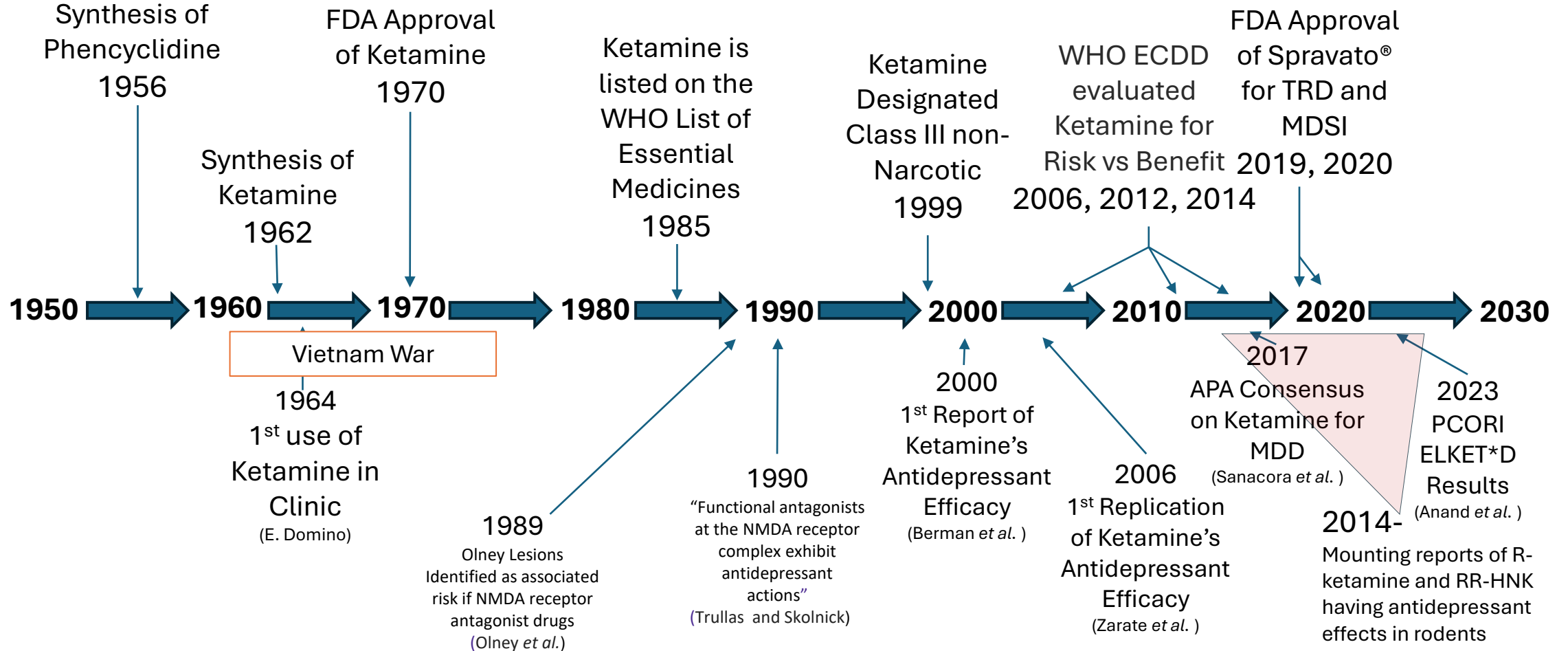
- In the past 2 years Dr. Sanacora has served as a consultant or scientific advisory board member to Ancora/Embark, Aptinyx, Axsome Therapeutics, Biogen, Biohaven Pharmaceuticals, Bristol-Myers Squibb, Clexio, Cowen, Denovo Biopharma, ECR1, EMA Wellness, Freedom Biosciences, Gilgamesh, Janssen, KOA Health, Levo Therapeutics, Merck, MiCure, Navitor Pharmaceuticals, Neurocrine, Novartis, Perception Neuroscience, Praxis Therapeutics, Relmada Therapeutics, Sage Pharmaceuticals, Seelos Pharmaceuticals, Transcend Therapeutics, Vistagen Therapeutics, and XW Labs; and received **research contracts** from Johnson & Johnson (Janssen), Merck, and Usona Institute. Dr. Sanacora **holds equity** in Biohaven Pharmaceuticals, Freedom Biosciences, Gilead, Relmada, Tetricus and is a co-inventor on a **US patent** (#8,778,979) held by Yale University and a co-inventor on US Provisional Patent Application No. 047162-7177P1 (00754) filed on August 20, 2018, by Yale University Office of Cooperative Research. **Yale University has a financial relationship** with Janssen Pharmaceuticals and may receive financial benefits from this relationship. The University has put multiple measures in place to mitigate this institutional conflict of interest. Questions about the details of these measures should be directed to Yale University's Conflict of Interest Office

Off-label use discussed

Several including;

Ketamine

Ketamine Timeline (Depression Centric)



Biological Explanations for Delayed Onset

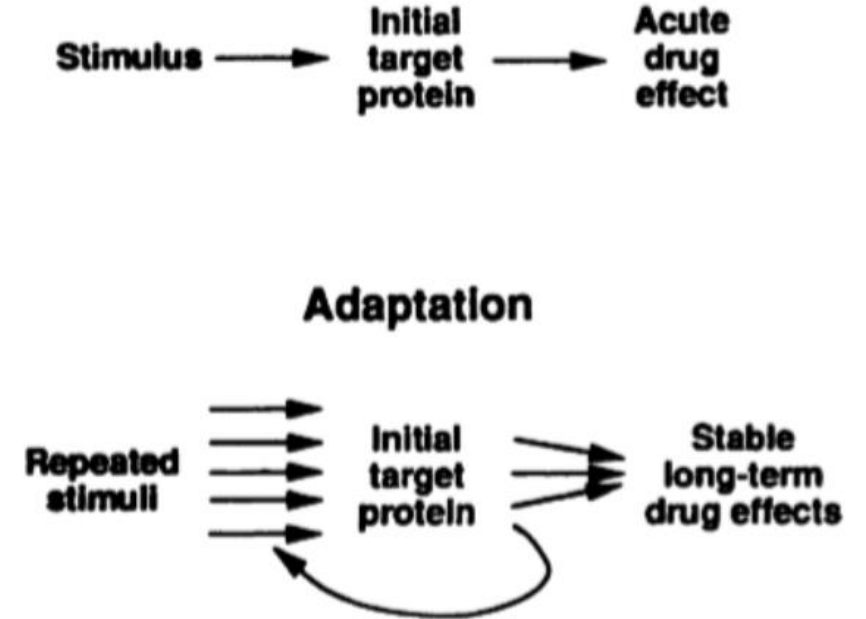
Initiation and Adaptation: A Paradigm for Understanding Psychotropic Drug Action

Steven E. Hyman, M.D., and Eric J. Nestler, M.D., Ph.D.

Objective: This article describes a paradigm—initiation and adaptation—within which to conceptualize the drug-induced neural plasticity that underlies the long-term actions of psychotropic drugs in the brain. *Method:* Recent advances in neurobiology are reviewed. *Results:* Recent developments in cellular and molecular neurobiology provide new conceptual and experimental tools for understanding the mechanisms by which psychotropic drugs produce long-lived alterations in brain function. Because of the availability of more robust animal models, the mechanisms by which drugs of abuse produce dependence are better understood than the mechanisms by which antidepressants, antipsychotics, and lithium produce their therapeutic effects. Nonetheless, the fundamental types of mechanisms appear to be similar: chronic drug administration drives the production of adaptations in postreceptor signaling pathways, including regulation of neural gene expression. Whether the results are deleterious or therapeutic depends on the precise neural systems targeted by a particular drug. *Conclusions:* Biological investigation in psychiatry has often focused too narrowly on synaptic pharmacology, especially on neurotransmitter turnover and neurotransmitter receptors. This review focuses on molecular and cellular changes in neural function that are produced as adaptations to chronic administration of addictive drugs such as psychostimulants and therapeutic drugs such as antidepressants. To understand normal brain function, psychopathology, and the actions of psychiatric treatments, and to exploit the eventual findings of psychiatric genetics, psychiatric research must now extend its efforts beyond the synapse, to an understanding of cellular and molecular neurobiology (in particular, postreceptor signal transduction) as well as to a better understanding of the architecture and function of neural systems. A paradigm is presented to help understand the long-term effects of psychotropic drugs, including the latency in onset of their therapeutic actions.

(Am J Psychiatry 1996; 153:151–162)

FIGURE 1. Initiation of and Adaptation to a Psychotropic Drug^a



Identifying the Glutamate NMDA Receptor as a Possible Target for Antidepressant Drug Development

European Journal of Pharmacology, 185 (1990) 1–10
Elsevier

1

EJP 51446

Functional antagonists at the NMDA receptor complex exhibit antidepressant actions

Ramon Trullas and Phil Skolnick

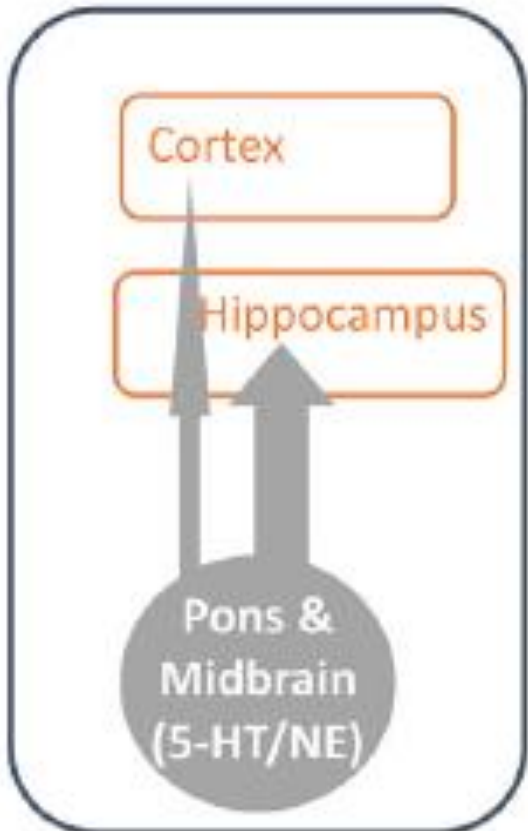
Laboratory of Neuroscience, National Institutes of Diabetes, Digestive, and Kidney Diseases, National Institutes of Health, Bethesda, MD 20892, U.S.A.

Received 22 February 1990, revised MS received 22 May 1990, accepted 29 May 1990

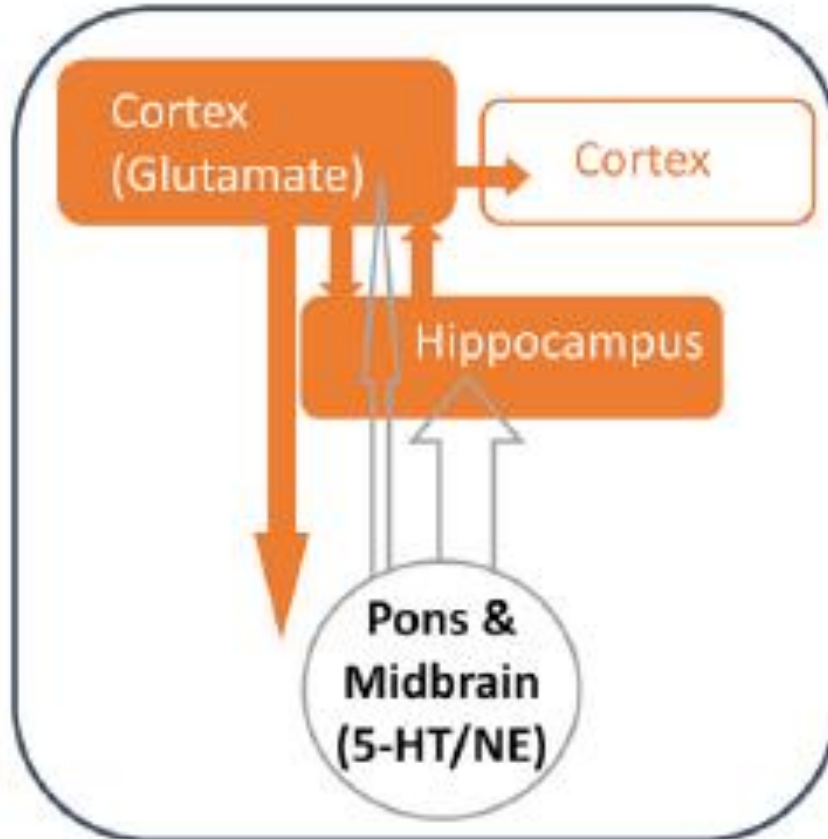
Inescapable, but not escapable, stress inhibits the induction of Long Term Potentiation (LTP) in the CA₁ region of hippocampus, a process that is dependent upon activation of the N-methyl-D-aspartate (NMDA) subtype of glutamate receptor. Since inescapable stress also produces a syndrome of behavioral depression sensitive to clinically effective antidepressants, we examined the actions of functional antagonists at the NMDA receptor complex in animal models commonly used to evaluate potential antidepressants. A competitive NMDA antagonist (2-amino-7-phosphonoheptanoic acid [AP-7]), a non-competitive NMDA antagonist (Dizolcipine [MK-801]), and a partial agonist at strychnine-insensitive glycine receptors (1-aminocyclopropanecarboxylic acid [ACPC]) mimicked the effects of clinically effective antidepressants in these models. These findings indicate that the NMDA receptor complex may be involved in the behavioral deficits induced by inescapable stress, and that substances capable of reducing neurotransmission at the NMDA receptor complex may represent a new class of antidepressants. Based on these findings, the hypothesis that pathways subserved by the NMDA subtype of glutamate receptors are involved in the pathophysiology of affective disorders may have heuristic value.

Changing Theories of Mood Disorder Pathophysiology

Historically dominant monoaminergic theory



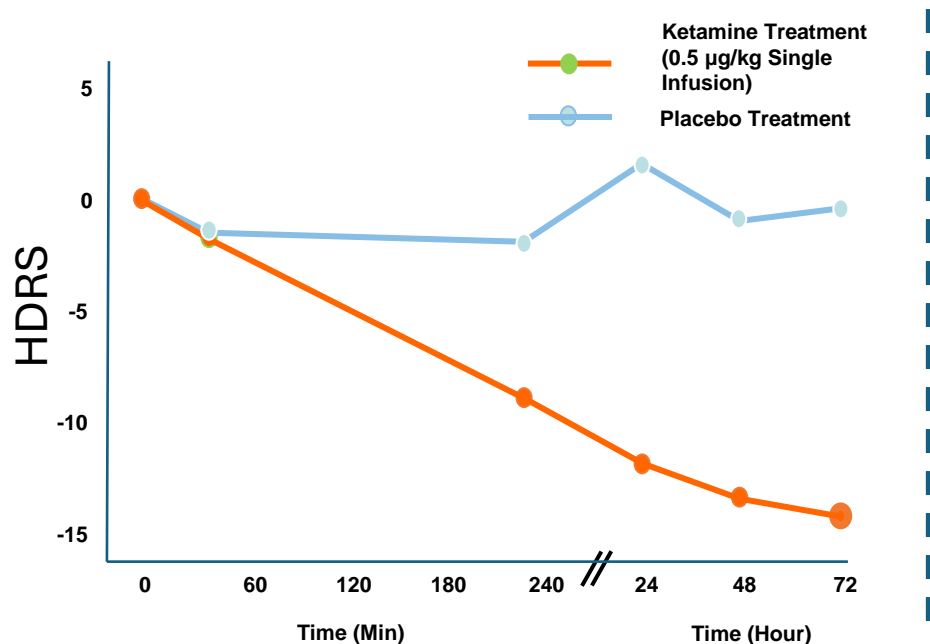
Shift to cortical and limbic pathology



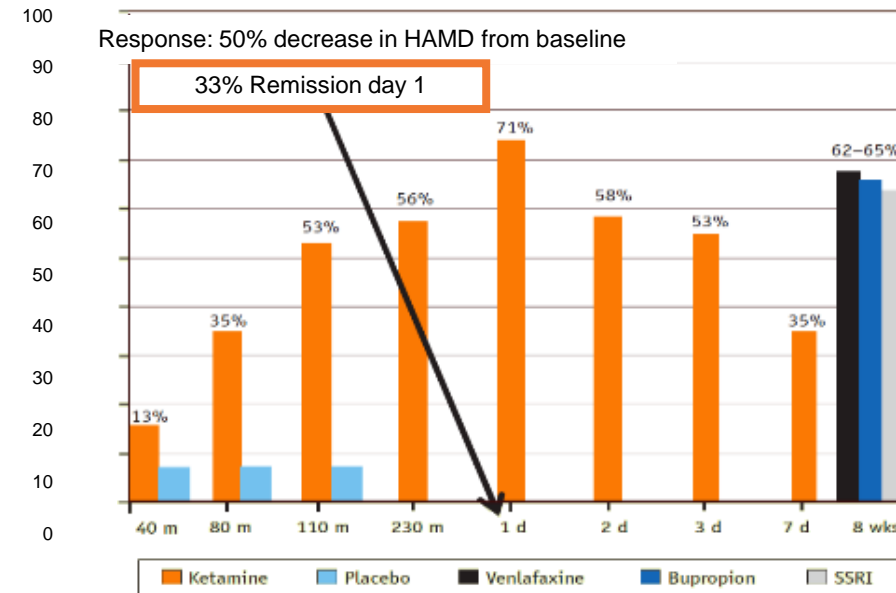
“If one viewed depression as a disorder of cortico-limbic function, then glutamatergic and GABAergic signaling would be implicated. This perspective shift led us to test the effects of the NMDA glutamate receptor antagonist as a probe of alterations in glutamate signaling associated with depression.”

Initial Reports of Ketamine's Rapid Antidepressant Action

“To the amazement of our patients and ourselves, we found that ketamine produced rapid, profound, and surprisingly durable antidepressant effects that were temporally dissociated from the brief acute behavioral effects of the drug” Krystal JH, et al. *Neuron*. 2019 Mar 6;101(5):774-778



RCT IV Ketamine vs. Saline (N=8)
 HDRS = Hamilton Depression Rating Scale for depression.
 Berman R, et al. *Biol Psychiatry*. 2000;47:351–354.

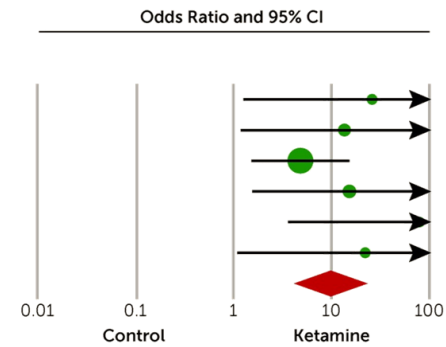


RCT IV Ketamine vs. Saline (N=18)
 Zarate et al. *Arch Gen Psych*. 2006.

IV Ketamine – Efficacy in MDD/TRD

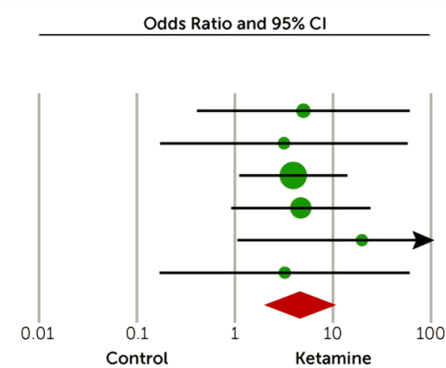
A At 1 day

Study	Statistics for Each Study				
	Odds ratio	Lower limit	Upper limit	Z-Value	p-Value
Diazgranados et al. (85)	26.053	1.359	499.339	2.164	0.030
Lapidus et al. (84)	13.600	1.238	149.455	2.134	0.033
Murrough et al. (87)	4.833	1.578	14.803	2.759	0.006
Sos et al. (91)	15.294	1.610	145.305	2.374	0.018
Zarate et al. (88)	79.545	3.762	1681.833	2.811	0.005
Zarate et al. (86)	22.176	1.133	434.158	2.042	0.041
	9.865	4.366	22.293	5.503	0.000

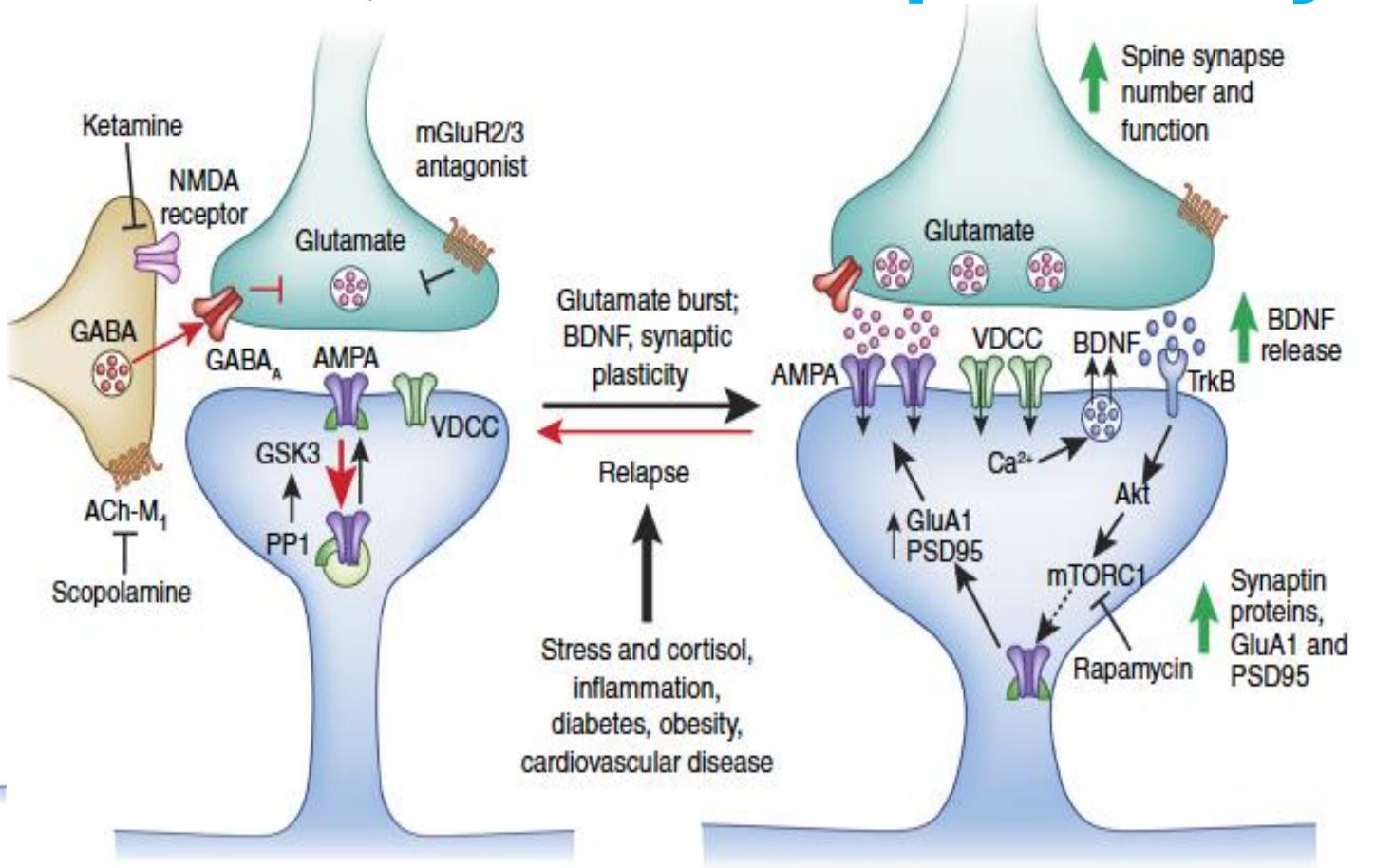
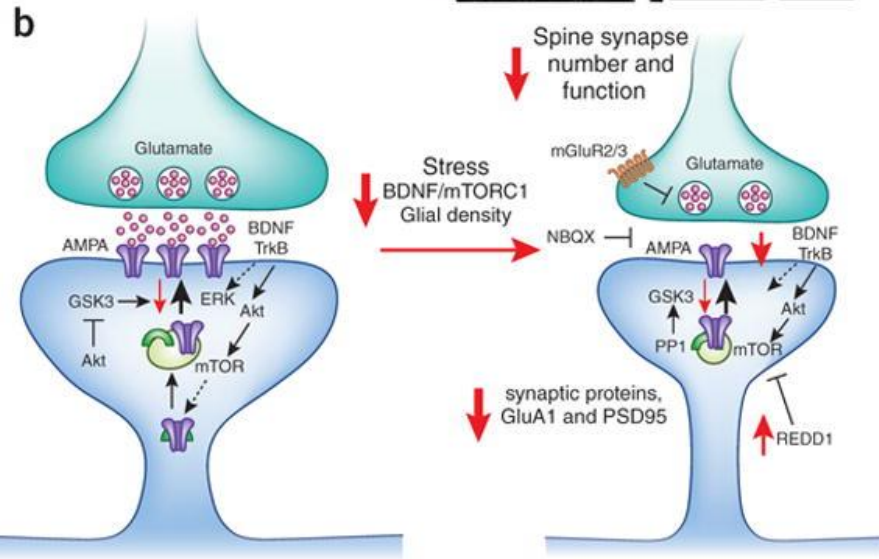
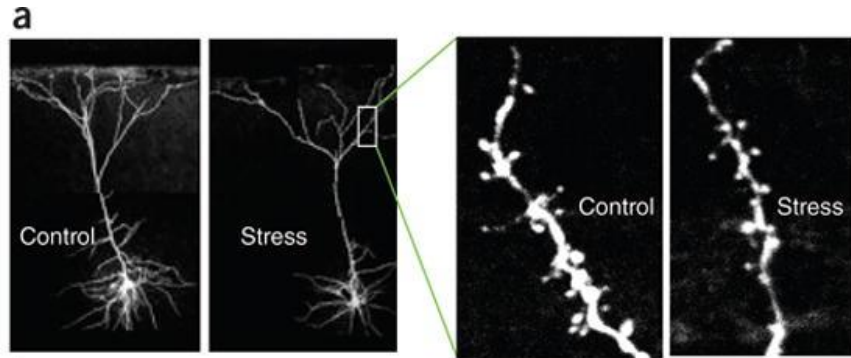


B At 1 week

Study	Statistics for Each Study				
	Odds ratio	Lower limit	Upper limit	Z-Value	p-Value
Diazgranados et al. (85)	5.000	0.426	58.636	1.281	0.200
Lapidus et al. (84)	3.171	0.179	56.222	0.787	0.431
Murrough et al. (87)	3.937	1.149	13.492	2.181	0.029
Sos et al. (91)	4.706	0.950	23.302	1.898	0.058
Zarate et al. (88)	19.783	1.060	369.109	1.999	0.046
Zarate et al. (86)	3.222	0.176	58.849	0.789	0.430
	4.610	2.076	10.236	3.754	0.000



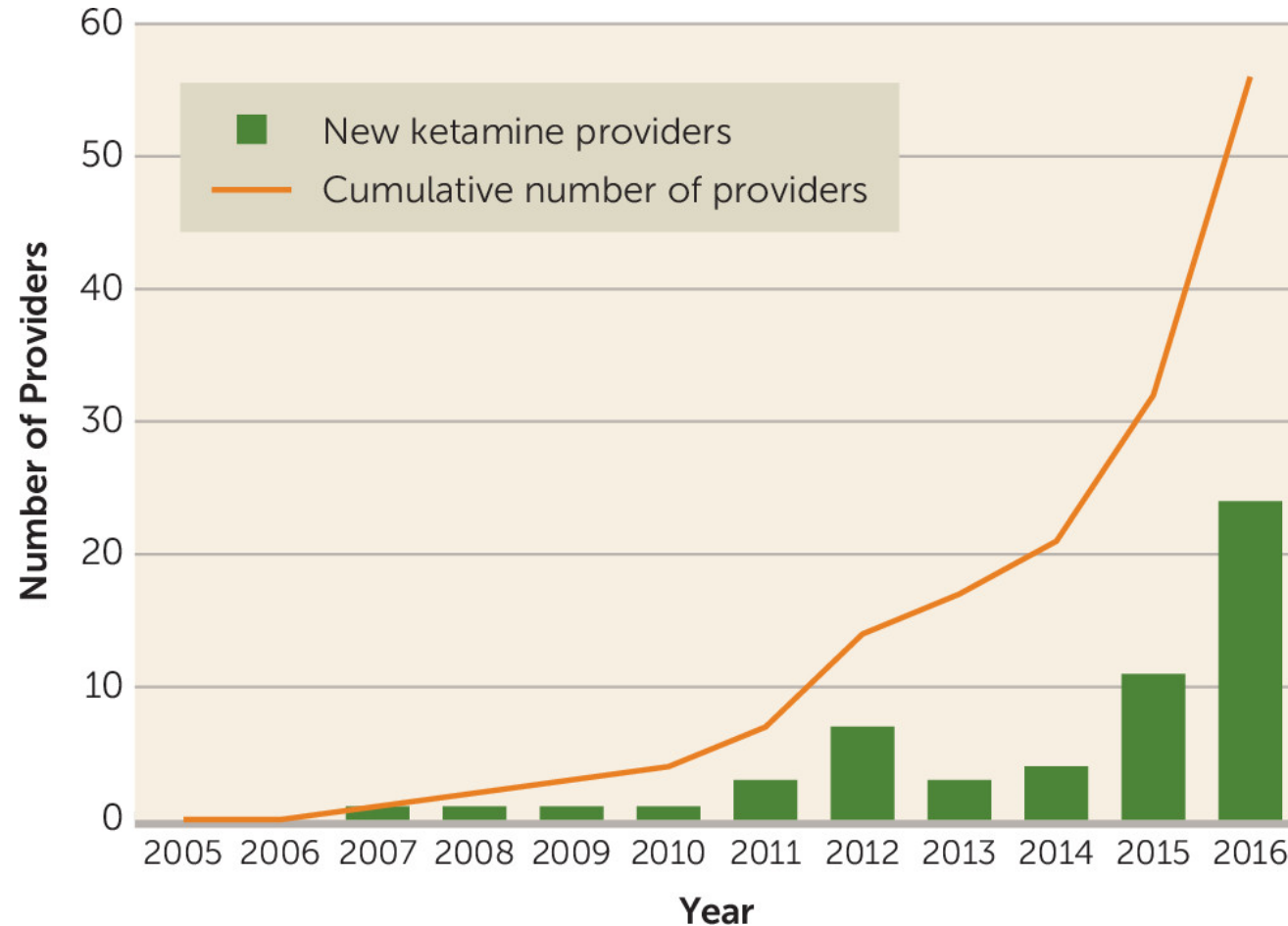
NMDA Receptor, Glutamate Burst, and Neuroplasticity



Duman, Aghajanian, Sanacora, and Krystal Nat Med. 2016 Mar; 22(3): 238–249.

Rapid Increase in Clinicians Providing Ketamine for the Treatment of Psychiatric Disorders

A Survey of the Clinical, Off-Label Use of Ketamine as a Treatment for Psychiatric Disorders



Total Number of Physicians Initiating the Practice of Providing Ketamine Off Label for the Treatment of Psychiatric Disorders per Calendar Year (Bars), and Cumulative Number of Ketamine Providers Over Time (Line)

Wilkinson et al. Am J Psychiatry. 2017 Jul 1;174(7):695-696

Potential Risks

Pathological Changes Induced in Cerebrocortical Neurons by Phencyclidine and Related Drugs

JOHN W. OLNEY, JOANN LABRUYERE, MADELON T. PRICE

Phencyclidine (PCP), a dissociative anesthetic and widely abused psychotomimetic drug, and MK-801, a potent PCP receptor ligand, have neuroprotective properties stemming from their ability to antagonize the excitotoxic actions of endogenous excitatory amino acids such as glutamate and aspartate. There is growing interest in the potential application of these compounds in the treatment of neurological disorders. However, there is an apparent neurotoxic effect of PCP and related agents (MK-801, tiletamine, and ketamine), which has heretofore been overlooked: these drugs induce acute pathomorphological changes in specific populations of brain neurons when administered subcutaneously to adult rats in relatively low doses. These findings raise new questions regarding the safety of these agents in the clinical management of neurodegenerative diseases and reinforce concerns about the potential risks associated with illicit use of PCP.

Science, Volume 244, Issue 4910 Jun 1989

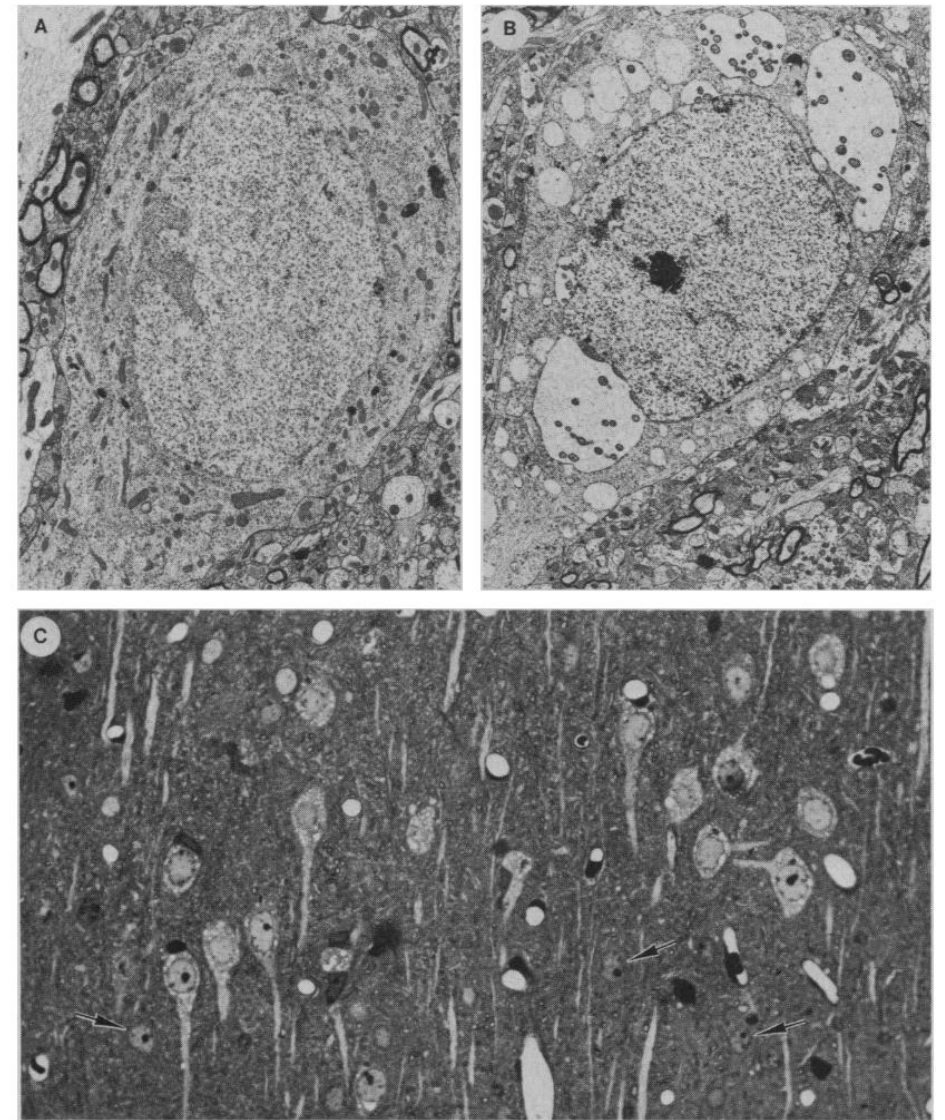


Fig. 1. (A) Electron micrograph depicting a large posterior cingulate cortical neuron from the brain of a normal untreated rat. The cytoplasm of this neuron contains many normal-appearing mitochondria, and there are no abnormal vacuoles ($\times 7000$). (B) A large posterior cingulate cortical neuron from a rat treated with PCP (5 mg/kg sc) 4 hours earlier. Very few normal mitochondria are evident in the cytoplasm but many vacuoles are present, some of which contain multiple small, round structures that appear to be remnants of mitochondria. The neuropil surrounding this neuron is well preserved, and there are many normal-appearing mitochondria in the neuropil components ($\times 7000$). (C) Numerous vacuole-containing large neurons in layers III and IV of the posterior cingulate cortex of a rat treated 4 hours earlier with MK-801 (1 mg/kg sc). Smaller neurons in other layers (arrows) are free from vacuoles ($\times 200$).

Balancing the Potential Benefits with the Current Knowledge and Potential Risks of Ketamine Treatment



JAMA Psychiatry | Special Communication

A Consensus Statement on the Use of Ketamine in the Treatment of Mood Disorders

Gerard Sanacora, MD, PhD; Mark A. Frye, MD; William McDonald, MD; Sanjay J. Mathew, MD; Mason S. Turner, MD; Alan F. Schatzberg, MD; Paul Summergrad, MD; Charles B. Nemeroff, MD, PhD; for the American Psychiatric Association (APA) Council of Research Task Force on Novel Biomarkers and Treatments

IMPORTANCE Several studies now provide evidence of ketamine hydrochloride's ability to produce rapid and robust antidepressant effects in patients with mood and anxiety disorders that were previously resistant to treatment. Despite the relatively small sample sizes, lack of longer-term data on efficacy, and limited data on safety provided by these studies, they have led to increased use of ketamine as an off-label treatment for mood and other psychiatric disorders.

OBSERVATIONS This review and consensus statement provides a general overview of the data on the use of ketamine for the treatment of mood disorders and highlights the limitations of the existing knowledge. While ketamine may be beneficial to some patients with mood disorders, it is important to consider the limitations of the available data and the potential risk associated with the drug when considering the treatment option.

CONCLUSIONS AND RELEVANCE The suggestions provided are intended to facilitate clinical decision making and encourage an evidence-based approach to using ketamine in the treatment of psychiatric disorders considering the limited information that is currently available. This article provides information on potentially important issues related to the off-label treatment approach that should be considered to help ensure patient safety.

JAMA Psychiatry. doi:10.1001/jamapsychiatry.2017.0080
Published online March 1, 2017.

[← Invited Commentary](#)

[+ Supplemental content](#)

Author Affiliations: Author affiliations are listed at the end of this article.

Group Information: The American Psychiatric Association (APA) Council of Research Task Force on Novel Biomarkers and Treatments members are listed at the end of this article.

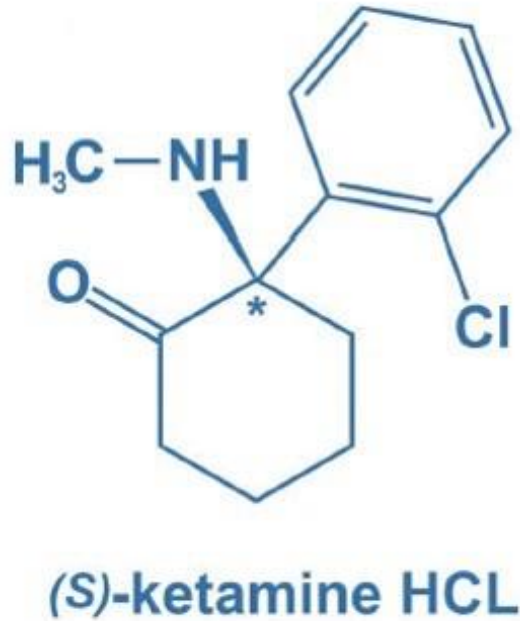
Corresponding Author: Gerard Sanacora, MD, PhD, Yale University School of Medicine, 100 York St, Ste 2J, New Haven, CT 06511 (gerard.sanacora@yale.edu).

Need to Address the Key, Clinically Relevant Questions Regarding Ketamine's Rapid Onset Antidepressant Effects

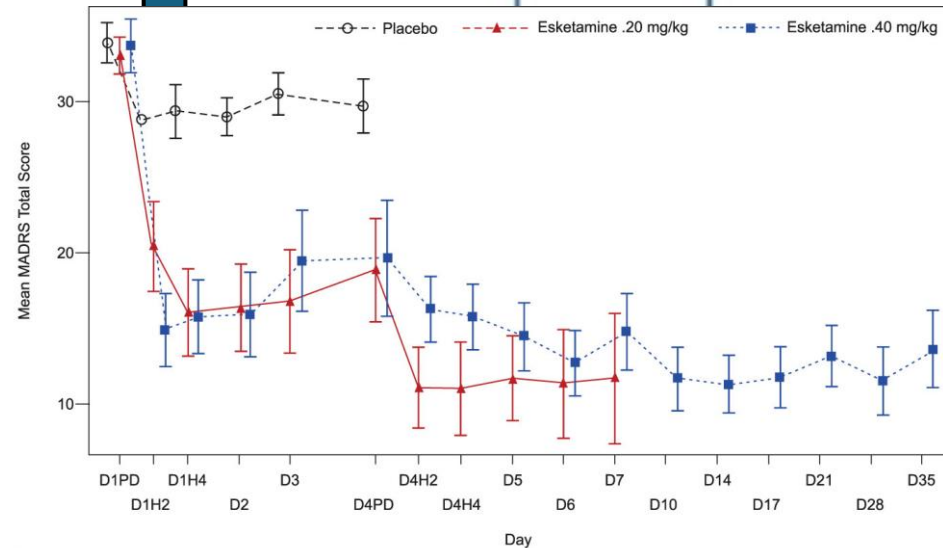
- **Immediate Clinical Relevance**

- What is the Optimal Dosing Strategy for Ketamine (dose, route, and frequency)?
- What is the Longer-term effectiveness of the treatment?
- What is Longer-term safety of the treatment approach?
- What are the Critical Moderators of response or adverse effects?
 - Diagnoses, Subtypes, genetic, or endophenotypic differences in response
 - Drug-drug interactions (regarding both safety and efficacy)

EsKetamine



The (S) enantiomer has a greater affinity for the NMDA glutamate receptor. This allows for a greater amount of NMDA receptor blockade with lower doses of the drug. (White et al.. (1980) Pharmacology of ketamine isomers in surgical patients. Anesthesiology 52: 231–239., Oye et al.. Effects of ketamine on sensory perception: evidence for a role of N-methyl-D-aspartate receptors J Pharmacol Exp Ther. 1992;260:1209–13)



Antidepressant effects of esketamine delivered intravenously

Number of Subjects

Placebo	10	10	10	10	10	10											
Esketamine .20 mg/kg	9	9	9	9	9	9	9	9	9	9							
Esketamine .40 mg/kg	11	11	11	11	11	11	20	20	20	19	20	29	29	27	29	28	27

Esketamine Phase 3 Clinical Development Program in Treatment-Resistant Depression (TRD)

Study	Design	n	Duration (wk)	Main endpoints
Acute, fixed dose study (3001, TRANSFORM-1)¹	Double-blind, active controlled	346	4-week induction	MADRS change at 4 weeks
Acute, flexible dose study (3002, TRANSFORM-2)²	Double-blind, active controlled	223	4-week induction	MADRS change at 4 weeks
Elderly, acute, flexible dose study (3005, TRANSFORM-3)⁵	Double-blind, active controlled	138	4-week induction	MADRS change at 4 weeks
Maintenance, relapse prevention study (3003, SUSTaIN 1)³	Open-label or double-blind induction (4-wks) and optimization (12-wks), followed by double-blind, active-controlled maintenance	705	Variable duration, longer term	Time to relapse; relapse in stable remitters; relapse in stable responders
Maintenance, safety study (3004, SUSTaIN 2)⁴	Open-label	802	52-weeks	Safety and tolerability

1. Fedgchin M, et al. Poster presented at: the 9th Biennial Conference of the International Society for Affective Disorders (ISAD); September 20-22, 2018; Houston, TX.; Fedgchin M, et al. *Int J Neuropsychopharmacol*. 2019 Jul 10. [Epub ahead of print] 2. Popova V, et al. Poster presented at the 2018 Annual Meeting of the American Society of Clinical Psychopharmacology (ASCP); May 29-June 1, 2018; Miami FL. ; Popova et al. *Am J Psychiatry*. 2019 Jun 1;176(6):428-438 3. Daly EJ, et al. Poster presented at the European College of Neuropsychopharmacology (ECNP) Congress; October 7, 2018; Barcelona, Spain.; Daly et al. *JAMA Psychiatry*. 2019;76(9):893-903 4. Wajs E, et al. Poster presented at the European College of Neuropsychopharmacology (ECNP) Congress; October 7, 2018; Barcelona, Spain. Wajs et al. *J Clin Psychiatry*. 2020 Apr 28;81(3):19 5. Ochs-Ross R, et al. Poster presented at the 2018 Annual Meeting of the American Society of Clinical Psychopharmacology (ASCP); May 29-June 1, 2018; Miami FL. Ochs-Ross et al. *Am J Geriatr Psychiatry*. 2020 Feb;28(2):121-141

IN Esketamine (Spravato®) FDA Approval

FDA approves new nasal spray medication for treatment-resistant depression; available only at a certified doctor's office or clinic, March 2019

<https://www.fda.gov/news-events/press-announcements/fda-approves-new-nasal-spray-medication-treatment-resistant-depression-available-only-certified>

Expanded use of SPRAVATO esketamine CIII nasal spray for the treatment of major depressive disorder (MDD) with acute suicidal ideation or behavior, August 2020.

<https://onlinelibrary.wiley.com/doi/abs/10.1002/mhw.32471>

Esketamine (Spravato®)

Guidance

Treatment Phase	Administration	Adult dosing
Induction phase		
Weeks 1-4: sessions 1-8	Twice weekly	Day 1 starting dose: 56 mg Subsequent doses: 56 or 84 mg
Maintenance phase		
Weeks 5-8 (early maintenance): sessions 9-12	Once weekly	56 or 84 mg
Week 9 and later: sessions 13 and beyond	Every 2 weeks or once weekly ^a	56 or 84 mg

ESK, esketamine nasal spray; TRD, treatment-resistant depression.

^aDosing frequency should be individualized to the least-frequent dosing to maintain remission/response.

	Outpatient HCSs	Inpatient HCSs	Pharmacies
Designate an authorized representative to review the ESK prescribing information and REMS Program Overview, complete an enrollment form and submit it to the REMS, and oversee implementation and coordinate activities of the REMS	X	X	X
Train all relevant staff involved in prescribing, dispensing, and/or administering ESK	X	X	X
Create processes and procedures to ensure ESK is administered under the direct supervision of a healthcare provider followed by at least 2 hours of monitoring	X	X	
Create processes and procedures to ensure ESK is dispensed only to REMS-certified HCSs and never directly to a patient			X
Submit all required patient enrollment and monitoring forms within the required time frames	X		
Maintain all records of product received and dispensing information	X	X	X
Comply with all REMS audits	X	X	X

ESK, esketamine nasal spray; HCS, healthcare setting; REMS, Risk Evaluation and Mitigation Strategy program. See enrollment form for a full list of requirements.



INSTRUCTIONS:

This form is intended only for use by outpatient medical offices or clinics, **excluding emergency departments**.

- Complete all required fields on this form after **every** treatment session for **all** outpatients enrolled in the SPRAVATO® REMS.
- Submit completed patient monitoring forms within **7 days**, online at www.SPRAVATOrems.com or by fax (1-877-778-0091).

*Indicates Required Field

Patient Information (PRINT)			
First Name*:	Mi:	Last Name*:	Birthdate* (MM/DD/YYYY): Sex*: <input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Other
Concomitant Medication			
Is the patient currently taking any of the following medication(s) that may cause sedation or blood pressure changes?			
• Benzodiazepines*	<input type="checkbox"/> Yes <input type="checkbox"/> No		
• Non-benzodiazepine sedative hypnotics*	<input type="checkbox"/> Yes <input type="checkbox"/> No		
• Psychostimulants*	<input type="checkbox"/> Yes <input type="checkbox"/> No		
• Monoamine oxidase inhibitors (MAOIs)*	<input type="checkbox"/> Yes <input type="checkbox"/> No		
Healthcare Provider Conducting Patient Monitoring (PRINT)			
First Name*:	Last Name*:		
Telephone*:	Email*:		
Healthcare Setting Information (PRINT)			
Healthcare Setting Name*:			
Healthcare Setting Address 1*:		Healthcare Setting Address 2*:	
City*:	State*:	ZIP*:	
Patient Treatment Session Information (Administration and Monitoring)			
Treatment Date*	Date (MM/DD/YYYY): _____		
Dose Administered*	<input type="checkbox"/> 56 mg <input type="checkbox"/> 84 mg <input type="checkbox"/> Other: _____		
Treatment Duration*	Total time _____ minutes (from 1st device administration to completion of monitoring) Patient must be monitored for at least 2 hours		
REMS Evaluation Question*	If there was not a 2-hour minimum monitoring requirement, when would this patient have been ready to leave/no longer require monitoring? _____ minutes from start of administration		
Monitoring of Vital Signs*	Vital signs were in acceptable range prior to: • administration? <input type="checkbox"/> Yes <input type="checkbox"/> No • treatment session completion? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Monitoring of Blood Pressure*	Prior to administration _____ mmHg	40 mins post-administration _____ mmHg	Prior to treatment session completion _____ mmHg
Did the patient experience Sedation and/or Dissociation			
Sedation*: <input type="checkbox"/> Yes <input type="checkbox"/> No		Dissociation*: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Onset of symptoms from start of administration* <input type="checkbox"/> 1-29 mins <input type="checkbox"/> 30-59 mins <input type="checkbox"/> 60-89 mins <input type="checkbox"/> 90-120 mins <input type="checkbox"/> >120 mins		Onset of symptoms from start of administration* <input type="checkbox"/> 1-29 mins <input type="checkbox"/> 30-59 mins <input type="checkbox"/> 60-89 mins <input type="checkbox"/> 90-120 mins <input type="checkbox"/> >120 mins	
Resolution of symptoms within 2 hours?* <input type="checkbox"/> Yes <input type="checkbox"/> No Specify total time to resolution*: _____ min		Resolution of symptoms within 2 hours?* <input type="checkbox"/> Yes <input type="checkbox"/> No Specify total time to resolution*: _____ min	
Medication(s) given for sedation?* <input type="checkbox"/> Yes <input type="checkbox"/> No • If YES, name and dose of medication(s): _____		Medication(s) given for dissociation?* <input type="checkbox"/> Yes <input type="checkbox"/> No • If YES, name and dose of medication(s): _____	

Real-World Safety Profile of Esketamine Nasal Spray During the First 12 Treatment Sessions: An Analysis at 58 Months After Approval in the United States

Mai Hinman; Ibrahim Turkoz; Teodora Doherty; Brienne Brown; Phung Quach; David M. Kern; Gerald Sanacora*

*Janssen Scientific Affairs, LLC, Johnson & Johnson company, Titusville, NJ; *Janssen Research & Development, LLC, Titusville, NJ; *Department of Psychiatry, Yale University School of Medicine, New Haven, CT

Introduction

Esketamine nasal spray (ESK) was approved by the US Food and Drug Administration, in conjunction with an off-label antidepressant, in March 2019 for the treatment of treatment-resistant depression (TRD) in adults and in July 2020 for the treatment of depressive symptoms in adults with major depressive disorder with acute suicidal ideation or behavior.¹

The recommended ESK dosing for TRD is shown in Table 1. Table 1. Recommended ESK dosing for TRD

Treatment Phase	Administration	Adult dosing
Induction phase		
Weeks 1-4, sessions 1-8	Twice weekly	Day 1 starting dose: 56 mg Subsequent doses: 56 or 84 mg
Maintenance phase		
Weeks 5-8 (early maintenance); sessions 9-12	Once weekly	56 or 84 mg
Week 9 and later; sessions 13 and beyond	Every 2 weeks	56 or 84 mg

ESK, esketamine nasal spray; TRD, treatment-resistant depression.
*Based on FDA requirements, Janssen developed and implemented a Risk Evaluation and Mitigation Strategy (REMS) program at the time of approval to mitigate the risks of serious adverse outcomes, including those resulting from sedation, dissociation, or from misuse and abuse, by ensuring the following:
- Healthcare settings (HCSs) that treat patients and pharmacies that dispense ESK are REMS certified.
- ESK is only dispensed and administered to patients in a medically supervised HCS that monitors these patients.
- Outpatients are enrolled in the REMS registry prior to treatment with ESK to further characterize risks and support safe use.
- All patients are informed about the potential for serious adverse outcomes resulting from sedation and dissociation and the need for monitoring.
- Patient administration is performed under the direct observation of a healthcare provider, and patients are required to be monitored by a healthcare provider in a healthcare setting for at least 2 hours after dosing for resolution of sedation and dissociation, and changes in vital signs.
- ESK is never dispensed directly to patients for home use.

TABLE 2. ESK REMS certification requirements for HCSs and pharmacies

	Outpatient HCSs	Inpatient HCSs	Pharmacies
Designate an authorized representative to review the ESK prescribing information and REMS Program Overview, complete an enrollment form and submit it to the REMS, and oversee implementation and coordinate activities of the REMS	X	X	X
Train all relevant staff involved in prescribing, dispensing, and/or administering ESK	X	X	X
Create processes and procedures to ensure ESK is administered under the direct supervision of a healthcare provider followed by at least 2 hours of monitoring	X	X	
Create processes and procedures to ensure ESK is dispensed only to REMS-certified HCSs and never directly to a patient			X
Submit all required patient enrollment and monitoring forms within the required time frames	X		
Maintain all records of product received and dispensing information	X	X	X
Comply with all REMS audits	X		

ESK, esketamine nasal spray; HCS, healthcare setting; REMS, risk evaluation and mitigation strategy; see enrollment form for a full list of requirements.

To comply with the REMS, certified pharmacies and HCSs must follow specific requirements to receive, dispense, and treat patients with ESK (Table 2).

Objective

To examine and summarize real-world incidence of ESK treatment-emergent adverse events (TEAEs) of interest (ie, actively solicited reports of sedation, dissociation, and increased blood pressure [BP] and serious adverse events [SAEs]) and to determine if the incidence of these events changed between the induction and maintenance periods.

Methods

Data from ESK REMS patient monitoring forms were analyzed to describe the key safety findings for the first 58 months (March 5, 2019, to January 5, 2024) after US product approval, with a focus on ESK TEAEs of interest (sedation, dissociation, and increased BP) and SAEs during the first 12 treatment sessions.
Results were summarized by first treatment session, sessions 1-8 (induction phase), and sessions 9-12 (early maintenance phase); the first 12 ESK treatment sessions were chosen for this analysis because most patients would have received ESK on similar schedules up to this point.
TEAEs reflect the percentage of patients who experienced at least 1 TEAE during the treatment phase.
Details of each outpatient treatment session, including the duration of monitoring after administration, BP values, TEAEs of interest (ie, sedation and dissociation), and all SAEs observed, are documented in the REMS patient monitoring form, which is required to be submitted to the FDA as part of the REMS program.
Post-administration BP increases, as measured at 40 min after dosing or at the time of discharge, was defined as an increase in systolic BP of at least 20 mm Hg or diastolic BP of at least 10 mm Hg compared with values prior to administration.
If pre-administration BP values were missing, systolic values ≥180 mm Hg and/or diastolic values ≥105 mm Hg after administration were also considered an increase.
SAEs for the ESK REMS were determined by the reporter and defined as any event occurring during or between sessions that results in:
- Hospitalization
- Disability or permanent damage
- Death
- A life-threatening event
- An important medical event (defined as any event that may jeopardize the patient or may require intervention to prevent any of the above outcomes).

Results

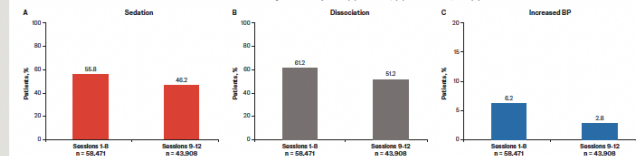
Baseline patient characteristics
A total of 58,453 patients had at least 1 ESK treatment session during the evaluation period. At the first treatment session, most patients (65.2%) were aged between 18 and 49 years, and 0.1% were female (Table 3).

TABLE 3. Patients with at least 1 ESK treatment session (March 5, 2019, to January 5, 2024)

n (%)	Patients with at least 1 ESK treatment session N = 58,453
Sex	
Female	35,762 (61)
Male	22,300 (38)
Other/unknown	421 (0.7)
Age category	
<12 years*	1 (<0.1)
13-17 years*	55 (0.1)
18-29 years	1,758 (3.0)
30-39 years	15,577 (23.2)
40-49 years	12,774 (21.8)
50-59 years	10,895 (18.6)
60-64 years	4,123 (7.1)
65-74 years	4,359 (7.5)
≥75 years	832 (1.4)
Region†	
Southern United States	20,844 (35.6)
Western United States	14,653 (25.1)
Midwestern United States	13,896 (23.8)
Northeastern United States	9,272 (15.9)
Other/unknown	18 (<0.1)

ESK, esketamine nasal spray.
*US Food and Drug Administration approval for use in patients <18 years of age.
†According to 2010 US Census Bureau Geography Division guidelines.

FIGURE 2. Cumulative incidence of solicited ESK TEAEs of interest by treatment phase (A) sedation, (B) dissociation, and (C) increased BP

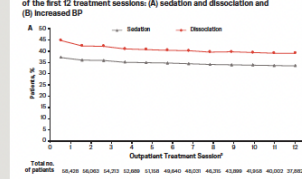


BP, blood pressure; ESK, esketamine nasal spray; TEAE, treatment-emergent adverse event.
For sessions 1-8, values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 1 and 8 (these data are included in the first treatment session). For sessions 9-12, values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 9 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").

TEAEs of sedation, dissociation, and increased BP

Rates of TEAEs of sedation, dissociation, and increased BP showed a consistent trend over the course of treatment (Figure 1).
Cumulative rates of solicited ESK TEAEs of interest in sessions 1-8 and sessions 9-12 were 58.9% and 65.3% for sedation, 61.3% and 61.2% for dissociation, and 6.3% and 2.8% for increased BP, respectively. Rates of TEAEs of interest generally decreased from induction to early maintenance (Figure 2).

FIGURE 1. Incidence of solicited reports of ESK TEAEs of interest over each of the first 12 treatment sessions: (A) sedation and dissociation and (B) increased BP



BP, blood pressure; TEAE, treatment-emergent adverse event.
Patients in the full analysis set had at least 1 treatment session.

*Last session with any dose.
†On the patient monitoring form, sedation was marked "yes."
‡On the patient monitoring form, dissociation was marked "yes."
§BP increase at 40 min or at the time of discharge was defined as post-administration BP increased ≥20 mm Hg to a value ≥180 mm Hg for systolic pressure or ≥10 mm Hg to a value ≥105 mm Hg for diastolic pressure compared with values prior to administration. If pre-administration blood pressure was missing, systolic values ≥180 mm Hg or diastolic values ≥105 mm Hg at 40 min after administration were also considered an increase.

Rates of sedation, dissociation, and increased BP decreased from the induction phase to the early maintenance phase across all dose levels (Table 4)

TABLE 4. TEAEs of interest by dose level and treatment session

n (%)	Sessions 1-8		Sessions 9-12	
	Last session dose*	Last session dose*	Last session dose*	Last session dose*
Sedation†	5964 (51)	26,389 (64.8)	1788 (43.4)	18,338 (46.4)
Dissociation†	6207 (54)	29,151 (62.8)	1732 (42.5)	20,543 (52.0)
Increased BP†	708 (6.2)	2888 (6.3)	128 (3.1)	906 (2.8)

BP, blood pressure; TEAE, treatment-emergent adverse event.
Patients in the full analysis set had at least 1 treatment session.
*Last session with any dose.
†On the patient monitoring form, sedation was marked "yes."
‡On the patient monitoring form, dissociation was marked "yes."
§BP increase at 40 min or at the time of discharge was defined as post-administration BP increased ≥20 mm Hg to a value ≥180 mm Hg for systolic pressure or ≥10 mm Hg to a value ≥105 mm Hg for diastolic pressure compared with values prior to administration. If pre-administration blood pressure was missing, systolic values ≥180 mm Hg or diastolic values ≥105 mm Hg at 40 min after administration were also considered an increase.

SAEs of sedation, dissociation, and increased BP

All 12 treatment sessions, sessions 1-8, and sessions 9-12, SAEs reports of sedation, dissociation, and increased BP were present in 40.8% of patients treated (Table 5).
During the first 12 treatment sessions, the most common SAEs were dissociation, dizziness, hypotension, increased BP, nausea, and vomiting (each 0.1%) (Table 6).
Using International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use and Good Clinical Practice criteria, SAEs resulting in hospitalization, death, a life-threatening event, or an important medical event occurred in 0.4% of patients across all studied treatment phases (Table 7).
Respiratory depression was identified as a new event of interest; additional data collection from patient monitoring forms and analyses from the REMS program are planned.

TABLE 5. Summary of SAEs of interest associated with reports of SAEs

n (%)	Treatment session		
	First session n = 58,453*	Sessions 1-8 n = 58,477*	Sessions 9-12 n = 43,909*
Patients with at least 1 SAE	152 (0.3)	485 (0.8)	125 (0.3)
Sedation			
Sedation	5 (<0.1)	12 (<0.1)	2 (<0.1)
Dissociation	18 (<0.1)	71 (0.1)	14 (<0.1)
Increased BP			
Increased BP	18 (<0.1)	71 (0.1)	14 (<0.1)

BP, blood pressure; SAE, serious adverse event.
Patients SAEs were counted once per phase. Therefore, it is possible that a patient had at least 1 SAE within each treatment phase.
*Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 1 and 8 (these data are included in the first treatment session).
†Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 9 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").

TABLE 6. Summary of the most common REMS-PMF SAE descriptions (0.1% during the first 12 treatment sessions)

n (%)	Treatment session			
	First session n = 58,453*	Sessions 1-8 n = 58,477*	Sessions 9-12 n = 43,909*	Sessions 1-12 n = 58,474*
Dissociation	15 (<0.1)	42 (0.1)	5 (<0.1)	46 (0.1)
Dizziness	19 (<0.1)	45 (0.1)	12 (<0.1)	55 (0.1)
Hypertension	15 (<0.1)	37 (0.1)	14 (<0.1)	49 (0.1)
Increased BP†	18 (<0.1)	71 (0.1)	14 (<0.1)	52 (0.1)
Nausea	28 (<0.1)	66 (0.1)	10 (<0.1)	77 (0.1)
Vomiting	29 (<0.1)	69 (0.1)	15 (<0.1)	82 (0.1)

ICH-QCQ International Council for Harmonisation of Technical Requirements for Pharmaceuticals; BP, blood pressure; SAE, serious adverse event.
*Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 1 and 8 (these data are included in the first treatment session).
†Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 9 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").
‡Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 1 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").
§Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 9 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").

TABLE 7. SAEs by ICH-QCQ criteria and treatment session

n (%)	Treatment session		
	First session n = 58,453*	Sessions 1-8 n = 58,477*	Sessions 9-12 n = 43,909*
Hospitalization	17 (<0.1)	70 (0.1)	30 (0.1)
Disability or permanent damage	(0)	(0)	(0)
Death	(0)	1 (<0.1)	(0)
Life threatening	1 (<0.1)	6 (<0.1)	1 (<0.1)
Important medical event†	74 (0.1)	237 (0.4)	62 (0.1)

ICH-QCQ International Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use and Good Clinical Practice.
*Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 1 and 8 (these data are included in the first treatment session).
†Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 9 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").
‡Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 1 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").
§Values represent patients who had at least 1 treatment session that was initiated in an outpatient treatment center between treatment sessions 9 and 12 (including "On the patient monitoring form, TEAE was marked "yes."").

Key takeaways

Actively solicited reports of sedation, dissociation, and increased blood pressure decreased over the course of ESK treatment and overall frequency of serious AEs was low

Limitations

The REMS Patient Monitoring Form only specifically solicited AEs of sedation, dissociation, and increased BP at each treatment session

Repeated analyses at the patient level are needed to determine how predictably AEs change over the course of ESK treatment

These data cannot be used to predict the likelihood of an AE occurrence for any individual patient

AE severity is not captured on the REMS Patient Monitoring Form

Based on other post-marketing sources, respiratory depression was identified as a new adverse reaction for ESK. Further analyses are currently underway to provide additional information regarding cases of respiratory depression

Conclusions

As anticipated, sedation and dissociation were commonly reported adverse events in the REMS program. Sedation, dissociation, and increased BP were more likely to occur during the first 8 treatment sessions compared with later sessions, and the likelihood of these events being associated with an SAE was rare

Overall frequency of SAEs with esketamine nasal spray remains low and consistent with the safety profile described in the US prescribing information

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Disclosures

MS, IBE, and AT are employees of Janssen Scientific Affairs, LLC, a Johnson & Johnson company (J, J&J), and are employees of Janssen Research & Development, LLC (J&J RD), J&J, LLC (J&J LLC), J&J, Inc. (J&J Inc), and J&J, Inc. (J&J Inc). J&J Inc has received research contracts from AstraZeneca, Bristol Myers Squibb, Eli Lilly and Company, Johnson & Johnson, Hoffmann-La Roche, Merck, Novartis, Sanofi, and Sunovion. MS, IBE, and AT are also co-inventors on US Patent Application No. 2022/0177777 (2022) filed on August 25, 2021, by the Yale University Office of Cooperative Research. Yale University has a financial relationship with Janssen Scientific Affairs and may receive financial benefits from this relationship. The University has put multiple measures in place to mitigate the potential conflict of interest. Questions about the details of these measures should be directed to Yale University's Conflict of Interest Office.

Targeting Novel Pathways in Depression



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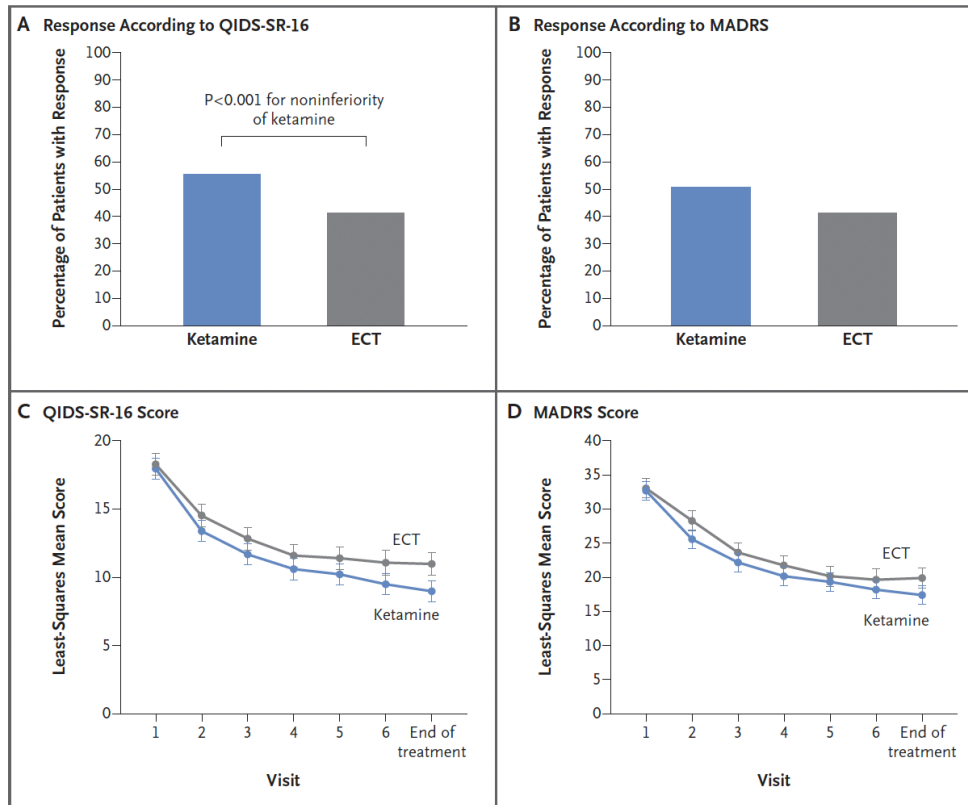
Supported by Janssen Scientific Affairs, LLC, a Johnson & Johnson company

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Ketamine versus ECT for Nonpsychotic Treatment-Resistant Major Depression

A. Anand, S.J. Mathew, G. Sanacora, J.W. Murrough, F.S. Goes, M. Altinay, A.S. Aloysi, A.A. Asghar-Ali, B.S. Barnett, L.C. Chang, K.A. Collins, S. Costi, S. Iqbal, M.K. Jha, K. Krishnan, D.A. Malone, S. Nikayin, S.E. Nissen, R.B. Ostroff, I.M. Reti, S.T. Wilkinson, K. Wolski, and B. Hu



Ketamine provided at 0.5mg/kg/40mins 2X week for 3 weeks. ECT provided 3 X week for 3 Weeks.

Response:

Ket- 108/195 (55.4%)

ECT- 70/170 (41.2%)

Remission:

Ket- 63/195 (32.3%)

ECT- 34/170 (20.0%)

Table 3. Moderate and Severe Adverse Events in the Modified Intention-to-Treat Population.*

Adverse Event	Ketamine	ECT
	<i>no. of patients/total no. (%)</i>	
Initial treatment phase		
≥1 Adverse event	49/195 (25.1)	55/170 (32.4)
Gastrointestinal adverse event	13/195 (6.7)	9/170 (5.3)
Muscle pain or weakness	1/195 (0.5)	9/170 (5.3)
Headache	16/195 (8.2)	12/170 (7.1)
Severe or prolonged hypertension	6/195 (3.1)	4/170 (2.4)
Suicidal ideation	4/195 (2.1)	2/170 (1.2)
Suicide attempt	0/195	0/170
Follow-up period		
≥1 Adverse event	17/108 (15.7)	10/70 (14.3)
Severe or prolonged hypertension	2/108 (1.9)	0/70
Suicidal ideation	4/108 (3.7)	1/70 (1.4)
Suicide attempt	1/108 (0.9)	0/70

Median final KIT dose prior to exit: 0.85 mg/kg; range of dosing quantiles is 0.6 to 1.3 mg/kg
Alison McInnes presented at ASCP May 2024 in Miami FL

* *P* > 0.05 for all adverse events except muscle pain or weakness (*P* = 0.01).

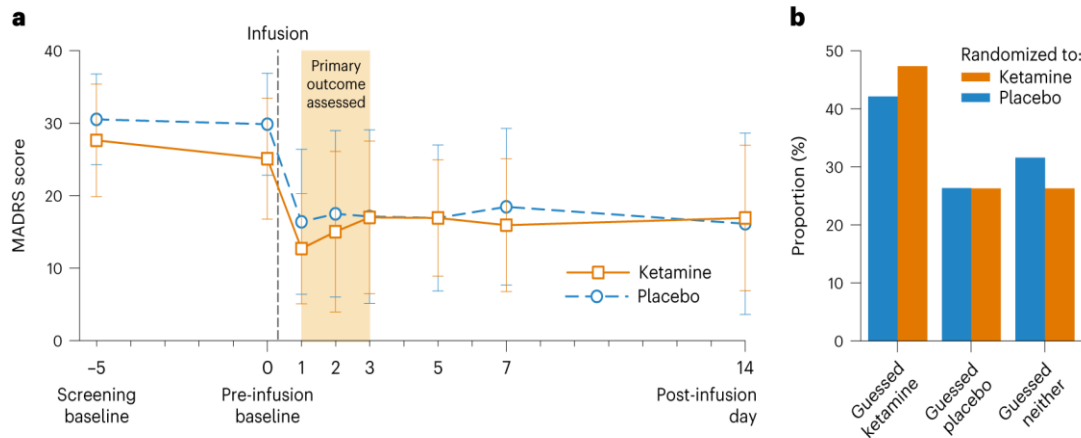
Randomized trial of ketamine masked by surgical anesthesia in patients with depression

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Theresa R. Li¹, Ashleigh E. Smith¹, Josephine R. Flohr¹, Robin L. Okada¹, Cynthia A. Nyongesa¹, Lisa J. Cianfichi², Laura M. Hack^{3,4}, Alan F. Schatzberg³ & Boris D. Heifets^{1,3}✉

Remission occurred in 50% of the ketamine Group on post-infusion day 1 and 35% of participants in the placebo group.

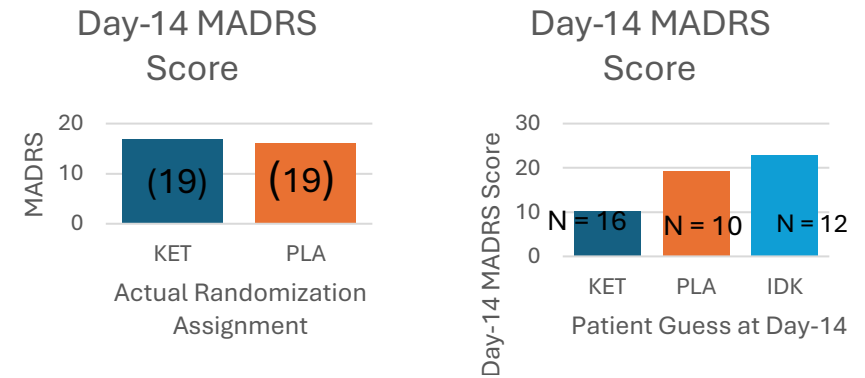
By post-infusion day 3, 40% of both groups remained in remission.



Placebo's role in the rapid antidepressant effect

Gerard Sanacora & Luana Colloca [Check for updates](#)

Numerous randomized placebo-controlled studies over the past two decades have shown that ketamine has a rapid antidepressant action. However, its acute transient effects on cognition and perception are likely to unmask study-arm assignment. Now, the use of surgical anesthesia to conceal treatment assignment finds high rates of rapid antidepressant response among participants, regardless of whether they are randomized to ketamine or placebo.



Logistic regression suggested a significant inverse relationship between these two variables (odds ratio = 0.89 (95% CI 0.81 to 0.96); P = 0.001).



Research paper

At-home, telehealth-supported ketamine treatment for depression: from longitudinal, machine learning and symptom network analysis to real-world data

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ABSTRACT

Background: Improving safe and effective access to ketamine therapy is a goal for mental illness. Telehealth-supported administration of sublingual ketamine (R-107) may be a promising approach. **Methods:** In this longitudinal study, moderately-to-severely depressed patients received open-label R-107 tablets 120 mg per day for 5 days and were assessed using the Patient Health Questionnaire (PHQ-9) for depression severity. **Results:** A sample of 11,441 patients was analyzed, demonstrating a non-severe ($n = 6384, 55.8\%$) and severe ($n = 2070, 18.1\%$) baseline depression. **Limitations:** This study was limited by the absence of comparison or procedure for ketamine administration. **Conclusions:** At-home, telehealth-supported ketamine administration was associated with improvement in patients with depression. Strategies for ketamine administration with rigorous telehealth models, as explored here, may uniquely address

1. Introduction

Ketamine, an *N*-methyl-D-aspartate (NMDA) receptor-mediated dissociative drug, has received substantial attention in the last decade as a breakthrough mental health intervention (Sanacora et al., 2017). Though ketamine was approved for medical use by the United States Food and Drug Administration (FDA) as an anesthetic in 1970, its psychiatric value went largely unrecognized until 2000, when the first randomized controlled trial using a subanesthetic dose of ketamine for the treatment of depression indicated positive results (Berman et al.,

2000). Numerous studies have since confirmed these findings, providing evidence that ketamine treatment for depression is effective and shows promise as a treatment for a wide range of mental health disorders (Walsh et al., 2019). Despite interest in dissociative anesthetics as a category of rapidly-acting mental health interventions (Lepow et al., 2023; Nayak et al., 2023), several issues have limited broader adoption. Most significantly, ketamine's dissociative effects have limited its use as an antidepressant. The FDA for use as an antidepressant

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VIEWPOINT

The Rapidly Shifting Ketamine Landscape

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In recent years, ketamine has been hailed as a miracle treatment for depression and related disorders. The US Food and Drug Administration (FDA) approved the S-enantiomer of ketamine, esketamine, as the first antidepressant in a new class for treatment-resistant depression in 2019.¹ Emerging evidence suggests that the landscape of ketamine both as a medical therapeutic and as a recreational substance is shifting. Herein, we highlight several key points that health care practitioners, policy makers, and patients and families should be aware of given this changing landscape.

Tight Control for Esketamine But Not Ketamine

Ketamine was approved in 1970 as an anesthetic. Early research in the 1990s and 2000s demonstrated that subanesthetic doses of ketamine could lead to rapid and powerful antidepressant effects. Without any regulatory approval regarding treatment of psychiatric disorders, in the 2010s, a growing number of health care practitioners began offering subanesthetic doses of ketamine to patients with depression and other disorders, judging that existing evidence justified therapeutic use in some individuals.² Preliminary reports suggest that this practice of off-label ketamine use as a therapeutic in psychiatry has continued to grow in prevalence, largely without regulation.³

The protocol with the most evidence comprises 0.5 mg/kg of ketamine delivered intravenously over 40 minutes, which achieves plasma concentration levels of 70 to 200 ng/mL.⁴ This is much lower than the plasma ketamine levels observed in patients awakening from ketamine anesthesia (500–1000 ng/mL) as well as the peak plasma levels used while patients are anesthetized (2000–3000 ng/mL).⁴ Patients often experience perceptual disturbances and dissociative adverse effects during the infusion that subside approximately 30 to 60 minutes following the end of the infusion, which necessitates a period of posttreatment monitoring. While this is the most commonly used protocol, there is considerable variability among health care practitioners in the community with respect to the way ketamine is administered. A consensus statement from key stakeholders strongly advised that ketamine treatment be conducted in a medical facility (as opposed to in a home setting) to limit drug diversion and so that health care professionals can immediately respond to acute medical and behavioral changes.⁴

Following completion of registration trials, the FDA formally approved esketamine as a therapy for treatment-resistant depression in March 2019. Esketamine was approved with a strict treatment protocol enforced by a mandatory drug safety program (the Risk Evaluation and Mitigation Strategy). In contrast, physicians continue to have flexibility in how off-label ketamine is prescribed, for which no drug safety program

exists. It should be noted that rigorous pharmacovigilance of ketamine administration (typically required for new drugs) is not required for off-label use.

The lack of oversight is particularly concerning given the potential for harm. The off-label use of ketamine is often accompanied by inadequate medical supervision, and patients may not be aware of the risks. The lack of oversight is particularly concerning given the potential for harm. The off-label use of ketamine is often accompanied by inadequate medical supervision, and patients may not be aware of the risks.

Potential for Widespread Use

While some have argued that the off-label use of ketamine is a necessary step toward approval of esketamine, others argue that it is a barrier to its development. The off-label use of ketamine (which has continued to exist despite regulatory attempts to elicit change) may be a barrier to its development. There is a need for regulatory oversight to ensure that ketamine is used safely and effectively. Whether ketamine is used in a clinical setting or as a recreational substance, it is important to ensure that patients are aware of the risks and benefits of its use.

As ketamine use has increased, there has been a corresponding increase in attention from the media and the public. This attention has led to a number of misconceptions about ketamine, including the idea that it is a "miracle cure" for depression. In reality, ketamine is a powerful dissociative anesthetic that can have significant side effects, including perceptual disturbances and dissociative adverse effects. It is important to ensure that patients are aware of the risks and benefits of its use, and that it is used in a safe and effective manner.

JAMA Psychiatry



Article

<https://doi.org/10.1038/s41591-024-03063-x>

Extended-release ketamine tablets for treatment-resistant depression: a randomized placebo-controlled phase 2 trial

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Check for updates

Paul Glue¹, Colleen Loo^{2,3}, Johnson Fam⁴, Hsien-Yuan Lane^{5,6}, Allan H. Young⁷, Peter Surman⁸ & BEDROC study investigators*

Ketamine has rapid-onset antidepressant activity in patients with treatment-resistant major depression (TRD). The safety and tolerability of racemic ketamine may be improved if given orally, as an extended-release tablet (R-107), compared with other routes of administration. In this phase 2 multicenter clinical trial, male and female adult patients with TRD and Montgomery–Asberg Depression Rating Scale (MADRS) scores ≥ 20 received open-label R-107 tablets 120 mg per day for 5 days and were assessed on day 8 (enrichment phase). On day 8, responders (MADRS scores ≤ 12 and reduction $\geq 50\%$) were randomized on a 1:1:1:1 basis to receive double-blind R-107 doses of 30, 60, 120 or 180 mg, or placebo, twice weekly for a further 12 weeks. Nonresponders on day 8 exited the study. The primary endpoint was least square mean change in MADRS for each active treatment compared with placebo at 13 weeks, starting with the 180 mg dose, using a fixed sequence step-down closed test procedure. Between May 2019 and August 2021, 329 individuals were screened for eligibility, 231 entered the open-label enrichment phase (days 1–8) and 168 responders were randomized to double-blind treatment. The primary objective was met; the least square mean difference of MADRS score for the 180 mg tablet group and placebo was -6.1 (95% confidence interval 1.0 to 11.16, $P = 0.019$) at 13 weeks. Relapse rates during double-blind treatment showed a dose response from 70.6% for placebo to 42.9% for 180 mg. Tolerability was excellent, with no changes in blood pressure, minimal reports of sedation and minimal dissociation. The most common adverse events were headache, dizziness and anxiety. During the randomized phase of the study, most patient dosing occurred at home. R-107 tablets were effective, safe and well tolerated in a patient population with TRD, enriched for initial response to R-107 tablets. ClinicalTrials.gov registration: ACTRN12618001042235.

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Where Do We Stand Today?

Considerations and challenges related to
system-wide implementation of
ketamine/esketamine for use beyond
anesthesia

Synthesizing the Evidence for Ketamine and Esketamine in Treatment-Resistant Depression: An International Expert Opinion on the Available Evidence and Implementation

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BOX 2. Esketamine and ketamine for treatment-resistant depression (TRD): Consensus

- Evidence supports the rapid-onset (i.e., within 1–2 days) efficacy of esketamine and ketamine in TRD.
- Efficacy in TRD is best established for intranasal esketamine and intravenous ketamine; there is insufficient evidence for oral, subcutaneous, or intramuscular ketamine in TRD.
- Intranasal esketamine demonstrates efficacy, safety, and tolerability for up to 1 year in adults with TRD.
- Evidence for long-term efficacy, safety, and tolerability of intravenous ketamine in TRD is insufficient.
- Safety concerns with respect to ketamine and esketamine include, but are not limited to, psychiatric (e.g., dissociation, psychotomimetic), neurologic/cognitive, genitourinary, and hemodynamic effects.
- Esketamine is FDA approved for major depressive disorder with suicidal ideation or behavior but has not been proven to reduce suicide completion.
- Esketamine and ketamine should be administered only in settings with multidisciplinary personnel including, but not limited to, those with expertise in the assessment of mood disorders. A Risk Evaluation and Mitigation Strategy (REMS) is required in some countries administering esketamine (e.g., the United States).

Collaborators

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BOX 3. Esketamine and ketamine in TRD: Future research vistas

- Comparative effectiveness data are needed (e.g., intravenous ketamine versus intranasal esketamine; esketamine or ketamine versus neurostimulation; esketamine or ketamine versus second-generation antipsychotics).
- A data commons and/or access to large public or private databases that provide the opportunity to assess serious but infrequent adverse events would provide a fuller understanding of the effectiveness and safety of esketamine and ketamine.
- Integrated measures (e.g., phenomenology, pharmacogenomics) should be used to identify ketamine response predictors as well as safety and tolerability predictors.
- Strategies to prolong the efficacy of esketamine and ketamine in adults with TRD are urgently needed (e.g., pharmacologic, manual-based psychosocial).
- More thorough characterization is needed of the long-term efficacy, safety, and tolerability of intravenous ketamine, as well as the possibility of withdrawal and/or tachyphylaxis/therapeutic tolerance.
- Characterization of the efficacy, tolerability, and safety of administration in less restrictive treatment environments (e.g.,

in physicians' offices or self-administration at home under certain conditions) is needed.

- Characterization of the relative efficacy, tolerability, and safety of oral, subcutaneous, and intramuscular formulations is needed.
- Further empirical study is needed on the risk for predisposing alcohol and other substance use disorders, as well as withdrawal-emergent suicidality, with esketamine and ketamine.
- Research is needed on the efficacy, safety, and tolerability of esketamine and ketamine in adults with non-treatment-resistant major depression as well as other mental disorders (e.g., major depressive disorder with psychosis, bipolar depression, posttraumatic stress disorder, substance use disorders).
- Integration of esketamine and ketamine with manual-based psychosocial treatments needs to be better characterized across mental disorders.
- The mechanism of action and tolerability of ketamine (e.g., role of opioidergic system), needs to be refined.
- The safety, tolerability, and efficacy of other ketamine derivatives (e.g., *R*-ketamine, *2R/6R*-hydroxynorketamine) remains to be characterized.
- Additional agents capable of rapid-onset antidepressant activity need to be identified.

Scope of Ketamine Use Clinical Practice

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Ketamine: ASRA, AAPM & ASA Guidelines for Chronic Pain

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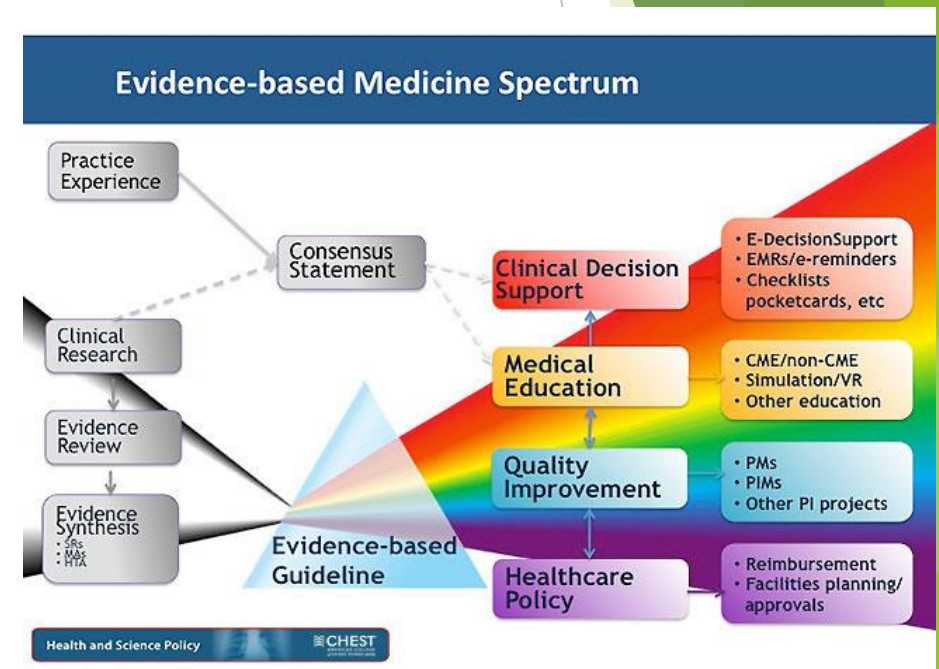
Financial Relationship Disclosure

- Consultant for Halyard, Scintilla, SPR, Boston Scientific & Abbott, Regeneron
- This presentation does discuss off-label usage



Methods of Development

- ▶ Consensus guidelines approved in November 2016 by ASRA BoD, and developed into a joint effort between ASRA and AAPM
 - ▶ In early 2018, ASA signed on with minimal revisions
- ▶ 8 questions established for chronic pain section, and 5 for acute pain section, which were approved by the committee
 - ▶ Decision made on 1st conference call to separate the two and to have a comprehensive review on ketamine attached to the chronic pain section
- ▶ Pain questions separated into modules of 3 to 4 people who collaborated on answer with Committee Chair, which were then sent to the entire committee for approval or further revisions
- ▶ Used modified USPSTF guideline criteria
 - ▶ Used by numerous pain organizations



Appendix Table 1. What the USPSTF Grades Mean and Suggestions for Practice

Grade	Definition	Suggestions for Practice
A	The USPSTF recommends the service. There is high certainty that the net benefit is substantial.	Offer/provide this service.
B	The USPSTF recommends the service. There is high certainty that the net benefit is moderate or there is moderate certainty that the net benefit is moderate to substantial.	Offer/provide this service.
C	The USPSTF recommends selectively offering or providing this service to individual patients based on professional judgment and patient preferences. There is at least moderate certainty that the net benefit is small.	Offer/provide this service for selected patients depending on individual circumstances.
D	The USPSTF recommends against the service. There is moderate or high certainty that the service has no net benefit or that the harms outweigh the benefits.	Discourage the use of this service.
I statement	The USPSTF concludes that the current evidence is insufficient to assess the balance of benefits and harms of the service. Evidence is lacking, of poor quality, or conflicting, and the balance of benefits and harms cannot be determined.	Read the Clinical Considerations section of the USPSTF Recommendation Statement. If the service is offered, patients should understand the uncertainty about the balance of benefits and harms.

Initial quality of evidence	Study design	Lower if	Higher if
High	RCT, systematic review, meta-analysis	Study limitations: 1↓ Serious 2↓ Very serious	Magnitude of effect: 2↑ Very strong 1↑ Strong
Moderate		Inconsistency: 1↓ Serious 2↓ Very serious	Dose-response gradient 1↑
Low	Observational study (cohort study, case control study)	Indirectness: 1↓ Serious 2↓ Very serious	All plausible confounders would have reduced the effect
Very low	Any other evidence (case series, case study)	Imprecision: 1↓ Serious 2↓ Very serious Publication bias 1 likely 2↓ Very likely	1↑

Definition: Overall quality of evidence across studies for the outcome

level A : 「High」 level B : 「Moderate」 level C : 「Low」 level D : 「Very low」

Acute & Chronic Pain Summary Guidelines

TABLE 6. Summary of ASRA/AAPM Recommendations for Subanesthetic Ketamine in Acute Pain

Recommendation Category	Recommendation	Level of Evidence*
Indications for use	<ol style="list-style-type: none"> (1) Perioperative use in surgery with moderate to severe postoperative pain (2) Perioperative use in patients with opioid tolerance (3) As analgesic adjunct in opioid-tolerant patients with sickle cell crisis (4) As analgesic adjunct in patients with OSA 	<ol style="list-style-type: none"> (1) Grade B, moderate certainty (2) Grade B, low certainty (3) Grade C, low certainty (4) Grade C, low certainty
Dosing range	Bolus: up to 0.35 mg/kg Infusion: up to 1 mg/kg per hour	Grade C, moderate certainty
Relative contraindications	<ol style="list-style-type: none"> (1) Poorly controlled cardiovascular disease (2) Pregnancy, psychosis (3) Severe hepatic disease, ie, cirrhosis (avoid), moderate hepatic disease (caution) (4) Elevated intracranial pressure, elevated intraocular pressure 	<ol style="list-style-type: none"> (1) Grade C, moderate certainty (2) Grade B, moderate (3) Grade C, low certainty (4) Grade C, low certainty
Personnel	Supervising clinician: a physician experienced with ketamine (anesthesiologist, critical care physician, pain physician, emergency medicine physician) who is ACLS certified and trained in administering moderate sedation Administering clinician: registered nurse or physician assistant who has completed formal training in safe administration of moderate sedation and is ACLS certified	Grade A, low certainty (see Consensus Guidelines on the Use of Intravenous Ketamine Infusions for Chronic Pain from ASRA, AAPM, and ASA) ³⁵

*Evidence was evaluated according to the USPSTF grading of evidence, which defined levels of evidence based on magnitude and certainty of benefit.⁵

TABLE 6. Summary of ASRA/AAPM/ASA Recommendations for Ketamine Infusions for Chronic Pain

Recommendation Category	Recommendation	Level of Evidence*
Indications	<ol style="list-style-type: none"> (1) For spinal cord injury pain, there is weak evidence to support short-term improvement (2) In CRPS, there is moderate evidence to support improvement for up to 12 wk (3) For other pain conditions such as mixed neuropathic pain, fibromyalgia, cancer pain, ischemic pain, headache, and spinal pain, there is weak or no evidence for immediate improvement 	<ol style="list-style-type: none"> (1) Grade C, low certainty (2) Grade B, low to moderate certainty (3) Grade D, low certainty
Dosing range and dose response	<ol style="list-style-type: none"> (1) Bolus: up to 0.35 mg/kg (2) Infusion: 0.5 to 2 mg/kg per hour, although dosages up to 7 mg/kg per hour have been successfully used in refractory cases in ICU settings (3) There is evidence for a dose-response relationship, with higher dosages providing more benefit. Total dosages be at least 80 mg infused over a period of >2 h 	<ol style="list-style-type: none"> (1) Grade C, low certainty (2) Grade C, low certainty (3) Grade C, low certainty
Relative contraindications	<ol style="list-style-type: none"> (1) Poorly controlled cardiovascular disease, pregnancy, active psychosis (2) Severe hepatic disease (avoid), moderate hepatic disease (caution) (3) Elevated intracranial pressure, elevated intraocular pressure (4) Active substance abuse 	<ol style="list-style-type: none"> (1) Grade B, low certainty (2) Grade C, low certainty (3) Grade C, low certainty (4) Grade C, low certainty
Role of oral NMDA receptor antagonist as follow-on treatment	(1) Oral ketamine or dextromethorphan, and intranasal ketamine can be tried in lieu of serial infusions in responders	(1) Grade B, low certainty for oral preparations, moderate certainty for intranasal ketamine
Preinfusion tests	<ol style="list-style-type: none"> (1) No testing is necessary for healthy individuals (2) In individuals with suspected or at high risk of cardiovascular disease, baseline ECG testing should be used to rule out poorly controlled ischemic heart disease. (3) In individuals with baseline liver dysfunction or at risk of liver toxicity (eg, alcohol abusers, people with chronic hepatitis), and those who are expected to receive high doses of ketamine at frequent intervals, baseline and postinfusion liver function tests should be considered on a case-by-case basis 	<ol style="list-style-type: none"> (1) Grade C, low certainty (2) Grade C, low certainty (3) Grade C, low certainty
Positive response	(1) A positive response should include objective measures of benefit in addition to satisfaction such as ≥30% decrease in pain score or comparable validated measures for different conditions (eg, Oswestry Disability Index for back pain)	(1) Grade C, low-to-moderate certainty
Personnel and monitoring	<ol style="list-style-type: none"> (1) Supervising clinician: a physician experienced with ketamine (anesthesiologist, critical care physician, pain physician) who is ACLS certified and trained in administering moderate sedation (2) Administering clinician: registered nurse or physician assistant who has completed formal training in safe administration of moderate sedation (3) Setting: at dosages exceeding 1 mg/kg per hour, a monitored setting containing resuscitative equipment and immediate access to rescue medications and personnel who can treat emergencies should be used, although this dose may vary based on individual characteristics 	<ol style="list-style-type: none"> (1) Grade A, low certainty (2) Grade A, low certainty (3) Grade A, low certainty

*Evidence was evaluated according to the US Preventive Services Task Force grading of evidence, which defined levels of evidence based on magnitude and certainty of benefit.⁵

ACLS indicates Advanced Cardiac Life Support; ICU, intensive care unit.

Key Points, Differences, Explanations & Updates

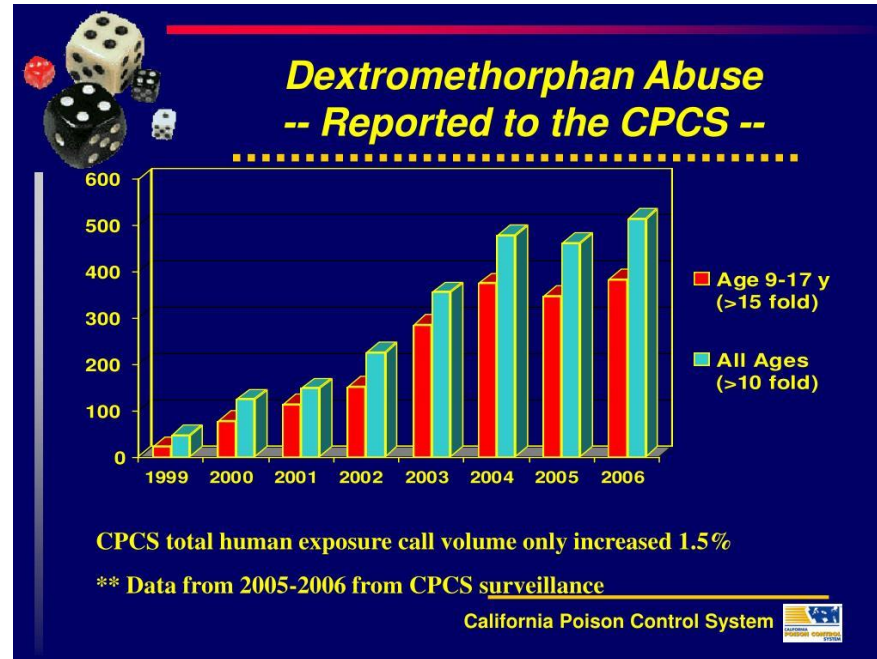
Question	Recommendations	Rationale
Who can give ketamine?	Physicians in charge of administration has DEA schedule 3 license (consistent with APA guidelines for depression treatment) but also be competent to administer moderate sedation (ACLS) b/c higher doses. The person who administers boluses can be an RN or physician with ACLS. For continuous infusions, a physician should be available to treat emergencies.	FDA classifies IV ketamine as indicated as an “anesthetic” agent for diagnostic and surgical procedures, ideally short-lasting; as an anesthetic induction agent; and to supplement low-potency agents such as N ₂ O. First line of monograph asserts emergence reactions occur in 12% of people (may require trained personnel).
What are the best indications?	Chronic: CRPS (Grade B), SCI (Grade B for up to 2-wk benefit), (migraine) headache (Grade D; 2 of 5 studies in ED for migraine show benefit). Acute: Pts undergoing painful surgeries; those with opioid tolerance or h/o OUD; severe acute pain including SSA; pts with sleep apnea.	Recommendations based on studies with different methodology; no conceptual basis for better response on CRPS & meta-analysis does not support superiority for any condition or pain category. Study from VA showed higher risk of relapse and overdose in pts with OUD in remission after surgery.
Contraindications	Poorly controlled cardiac dx or psychosis (Grade B), liver impairment & elevated IO and IC Pressure (Grade C). For chronic (not acute) pain, Grade C for active substance use disorder .	Weak evidence for elevated intraocular and ICP as contraindication; reports on cardiac cx infrequent. Difference for substance use disorder for acute vs. chronic pain based on stronger need for non-opioid analgesics for acute pain and higher doses needed for chronic pain.
Risk mitigation	No labs necessary for healthy individuals (c/w ASA recommendations for surgery). Baseline LFTs (and peri/post-infusion testing, and pre-testing EKG as needed.	Physician available who can address side effects (psychiatric, CV, GI, etc.). Short-acting BZD (midazolam) and/or alpha-2 agonist (clonidine) may prevent AEs.
Dosage	0.35 mg/kg bolus, with up to 1 mg/kg/h for acute and up to 2 mg/kg/h for chronic pain.	The rationale for chronic pain (reverse central sensitization) may require higher doses, and dose-response relationship studied more for chronic pain. Effects may depend on total dose, peak blood levels and rate of rise to peak blood levels.

Is There Any Role For Oral ketamine Or Another NMDA Receptor Antagonist As A Follow-Up treatment In Lieu Of Repeat Infusions?

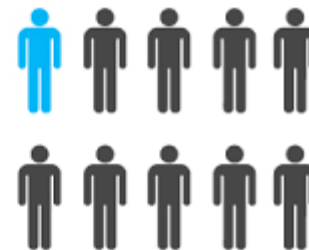
- ▶ Most placebo-controlled trials demonstrate no benefit from oral ketamine, though one showed an opioid-sparing effect
 - ▶ Oral ketamine has a bioavailability < 20% with wide variability
 - ▶ Contains abuse potential
- ▶ RCTs have demonstrated short but not long-term benefit from intranasal ketamine for acute & chronic pain, neuropathic pain and migraines
 - ▶ Bioavailability 40% with rapid on- and offset
- ▶ Cohen et al. (2004, 2006, 2009) found that IV ketamine predicts response to oral dextromethorphan for neuropathic pain, fibromyalgia and for opioid-tolerant people
 - ▶ Sensitivity 76%
 - ▶ Specificity 78%
 - ▶ PPV 67%
 - ▶ NPV 85%
 - ▶ Placebo response rate higher in ketamine responders (i.e. past (+) response predicts future (+) response)

Use Of Non-Ketamine NMDA Receptor Antagonists Have Yielded Mixed Results for Neuropathic Pain

- ▶ Dextromethorphan, amantadine - conflicting results
- ▶ Memantine- negative
- ▶ Magnesium- positive, but few studies & small sample sizes
- ▶ Carbamazepine- positive



One in 10
American
teenagers has
abused products
with DXM



Level of Evidence

- ▶ Considering the costs and resources involved, it is reasonable to provide a trial with follow-up oral or intranasal ketamine, or dextromethorphan, in lieu of serial treatments.
- ▶ Higher dose, repeat infusions should be provided to non-responders to other treatment regimens up to 8-12 per year.

▶ **LOW LEVEL OF CERTAINTY FOR ORAL PREPARATIONS, MODERATE FOR INTRANASAL, GRADE B RECOMMENDATION**



Is There Any Evidence for a Dose-Response Curve or Therapeutic Cutoff

- ▶ All analgesic medications are associated with a therapeutic dose range
- ▶ For depression, a systematic review found that dosages above 0.5 mg/kg over 40 minutes were more effective than lower dosages
- ▶ Maher et al. found higher dosages and longer infusions were associated with longer durations of pain relief
- ▶ Noppers et al. found infusions < 2 h were likely to be ineffective
 - ▶ Infusions > 10 h were 95% likely to provide pain relief > 48 h, while those > 30 h were 99% likely
- ▶ In providing the rationale for anesthetic (> 7 mg/kg/h) doses of ketamine, Kiefer et al. found higher doses resulted in better relief
- ▶ Orhuru et al. Anesth Analg 2019: 2 of 3 RCTs that used > 400 mg cumulative dose reported benefit vs. 1 of 3 that used low-dose
- ▶ MD for high-dose -2.72 points; 95% CI, -3.18 to -2.27 points; P < 0.001 vs. MD for low-dose -1.20 points; 95% CI, -1.43 to -0.96 points; P < 0.001
 - ▶ Likely cumulative dose, peak blood levels and rate of rise to peak blood levels that determine benefit
 - ▶ Weak correlation between psychomimetic & antidepressant effects\
 - ▶ Not all studies show dose response or correlation with blood levels (2 RCTs showed no correlation with serum levels)

Level of Evidence

- ▶ There is moderate evidence to support higher dosages of ketamine over longer time periods, and more frequent administration for chronic pain.
 - ▶ Higher doses also carry greater risks
- ▶ Similar to the strategy employed for opioids and other analgesic drugs with significant side effect profiles, it is reasonable to start dosing with a single, outpatient infusion lasting more than 2 hours, and reassess before initiating further treatments- similar to the strategy widely recommended for epidural steroid injections.

▶ **LOW LEVEL OF CERTAINTY, GRADE C RECOMMENDATION**



What Constitutes a Positive Treatment Response?

- ▶ The threshold used to designate responders must consider risks and costs of treatment
- ▶ $\geq 30\%$ decrease in pain considered “clinically meaningful”
 - ▶ $\geq 12.8\%$ decrease in ODI clinically meaningful for back pain
 - ▶ Different than what is considered “statistically significant” in a placebo-controlled trial
- ▶ Should consider function, psychological and emotional well-being, sleep, medication use and satisfaction
- ▶ Among RCTs evaluating ketamine for chronic pain, 4 used $\geq 50\%$ pain relief as the cutoff for a “responder”
 - ▶ 1 (-) study used $\geq 30\%$ for cancer pain
- ▶ Studies evaluating patients for over 2 weeks did not designate a time frame for a “positive outcome”

Level of Evidence

- ▶ We consider > 30% decrease in pain, or a comparable improvement in function, coupled with patient satisfaction to be a positive outcome
- ▶ Single outpatient infusions should provide relief lasting > 3 weeks, while inpatient or serial outpatient infusions should provide relief lasting > 6weeks
 - ▶ Patient expectations and satisfaction should be considered
- ▶ Similar to guidelines for ESI, a “series” of infusions should not be administered by rote, but rather tailored to patient response. Considering the risks of long-term ketamine treatment, limiting these to no more than 12 per year is reasonable, though deviations may be made in exceptional circumstances
- ▶ **MODERATE LEVEL OF CERTAINTY, GRADE C RECOMMENDATION**



Ketamine and Psychiatric Morbidity

- ▶ Co-prevalence rate of depression 30%-60%
- ▶ Ketamine makes people 'feel good'
- ▶ Low-dose ketamine alleviates depression
 - ▶ IV ketamine, higher doses > Esketamine
 - ▶ Psychomimetic effects correlated with antidepressant effects in 37.5% of studies
- ▶ Evidence growing for PTSD & other psychiatric illnesses
- ▶ Growing rate of abuse
 - ▶ 2.3 million people in U.S. over 12 years old reported using ketamine
 - ▶ 3% of high school students
 - ▶ Increasingly implicated in MVCs
 - ▶ One study in Hong Kong found ketamine in 45% of subjects involved in non-fatal MVCs

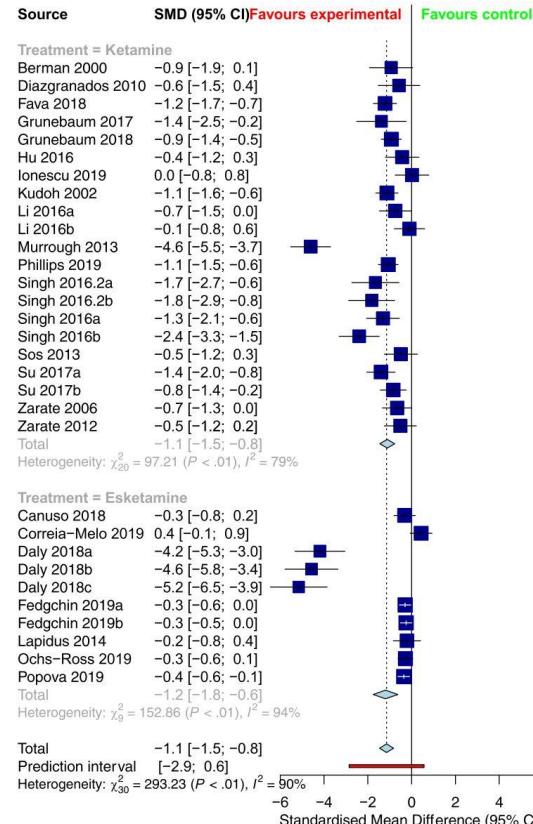
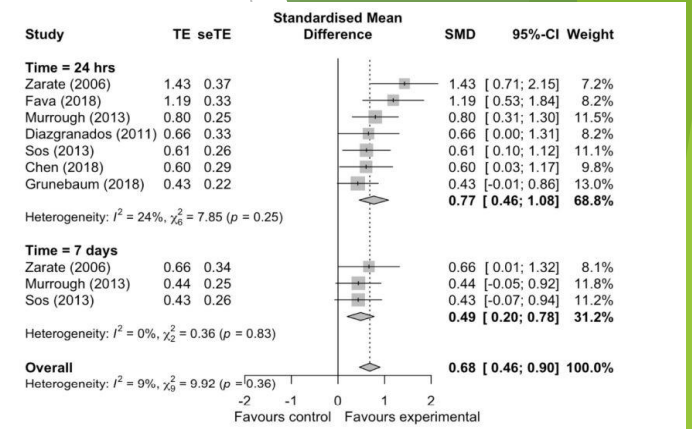
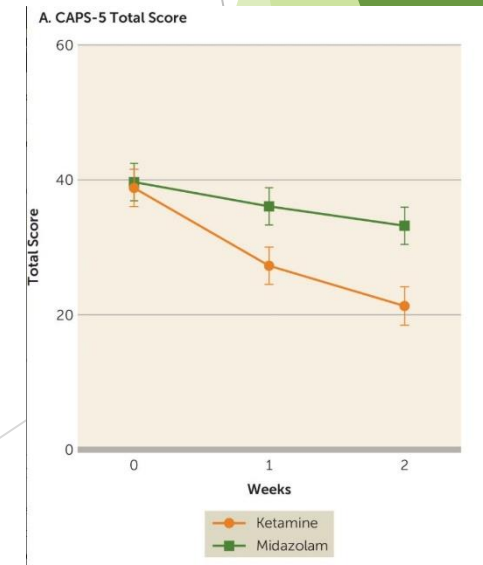


Fig. 4. Subgroup meta-analysis of depression rating scores in the treatment of depression with ketamine versus esketamine.

Bahji et al. 2021: IV Ketamine vs. s-Ketamine for Depression



Marcantoni et al. 2020: 0.5 mg/kg IV Ketamine vs. Placebo for Depression

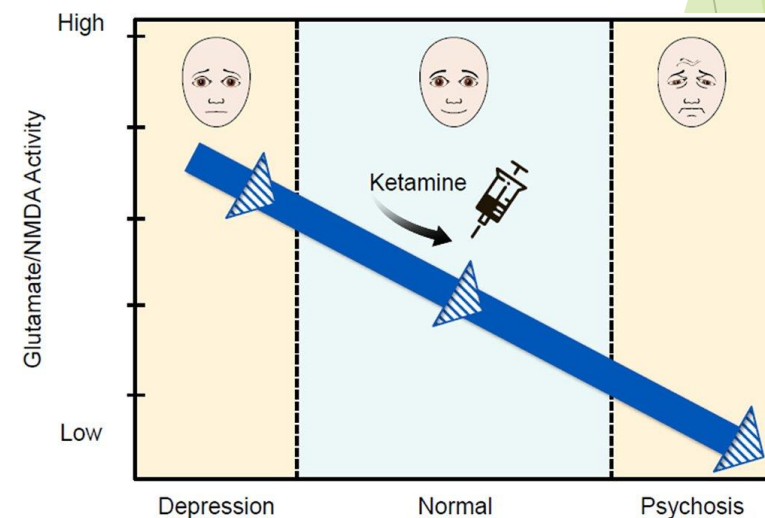


Feder et al. 2021: Repeat Ketamine vs. Versed for PTSD

Pain Dimensions: More Effective for Affective Component?

- ▶ Described in 1968 by Melzack & Casey
- ▶ Sensory-Discriminative- Based on nociceptive input, includes magnitude & location
 - ▶ Can be measured by QST
- ▶ Affective-Motivational- Evolutionary arousal & negative emotions (unpleasantness), from limbic & reticular structures
- ▶ Cognitive-Evaluative- Provides contextual info based on past experiences and likely outcomes (attitudes and beliefs), processed via higher CNS structures

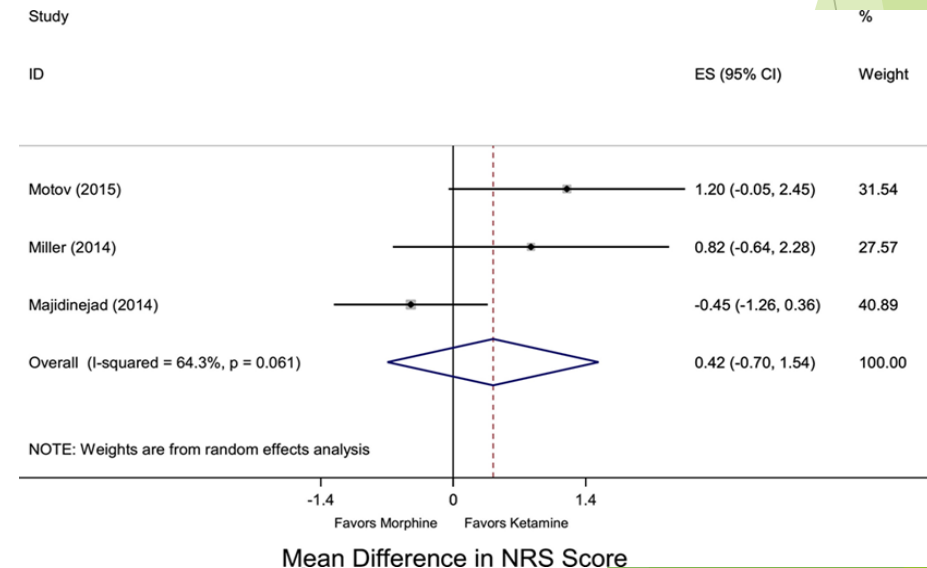
- ▶ Large majority of studies have reported negative effects of ketamine on QST
- ▶ Schwartzman et al. RCT evaluating ketamine in 19 pts with CRPS: 31% reduction in S-D component vs. 46% in A-M component
- ▶ 2 studies reported better pain relief in obese pts, who have higher affective pain component



Acute Pain Indications

- ▶ Moderate to severe postoperative pain, refractory to opioids or with limiting side effects
- ▶ Opioid tolerant patients
- ▶ Substance misuse disorder not a contraindication
 - ▶ Data suggest higher risk of relapse and overdose after surgery in pts with ho OUD
- ▶ Sickle cell anemia
- ▶ Patients with obstructive sleep apnea
- ▶ **Grade C evidence for ketamine PCA as sole analgesic for postoperative pain, Grade B for adjunct to opioids**

- ▶ Karlow et al. Ann Emerg Med 2018: Meta-analysis comparing low-dose (< 0.5 mg/kg) IV ketamine to opioids for acute pain in ED
- ▶ 3 studies, 251 patients
- ▶ Mean difference in pain scores 0.42 (95% CI = -0.70 to 1.54)
- ▶ Ketamine had more AEs (18 vs. 8) and requests for repeat dosing (4 vs. 0)



Take Home Points

- ▶ The skyrocketing use of ketamine warrants the development of consensus guidelines, which may improve patient care, inform regulatory guidelines, and enhance safety
- ▶ Considering the risks and resources involved in IV ketamine infusions, and their lack of long-term benefit, it is reasonable to trial an oral NMDA receptor antagonist, though the evidence supporting their effectiveness is mixed
- ▶ Indirect evidence, evidence-based reviews and extrapolation from clinical trials evaluating other analgesics support a dose-response relationship for subanesthetic dosages of ketamine for chronic pain
- ▶ Per IMMPACT guidelines, a positive treatment response must consider not only pain relief but also AE's, analgesic usage, patient expectations/ satisfaction, functional changes, sleep and psychological benefit
- ▶ Growing evidence for use in acute pain, even without opioids
- ▶ Compared to use for anesthesia (and even depression), research on ketamine for chronic pain is in its infancy, and should focus on indications, patient selection, long-term efficacy, and side effects

Scope of Ketamine Use Clinical Practice



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Ketamine and Esketamine Delivery for Treatment Resistant Depression in the Veterans Health Administration

VA



U.S. Department
of Veterans Affairs

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Office of Mental Health, Veterans Health Administration*

27 June 2024



810 Vermont Ave, Washington DC

Ketamine & Esketamine “National Protocol Guidance” for VA

Ketamine Infusion for Treatment Resistant Depression and Severe Suicidal Ideation

National Protocol Guidance

July 2022

VA Pharmacy Benefits Management Services, Medical Advisory Panel, VISN Pharmacist Executives, and Office of Mental Health Somatic Treatment Field Advisory Committee

https://www.va.gov/formularyadvisor/DOC_PDF/CRE_Ketamine_Infusion_for_Treatment_Resistant_Depression_Rev_Jul_2022.pdf

Intranasal Esketamine for Depression

National Protocol Guidance

February 2022

VA Pharmacy Benefits Management Services, Medical Advisory Panel, VISN Pharmacist Executives, and Office of Mental Health and Suicide Prevention

https://www.va.gov/formularyadvisor/DOC_PDF/CRE_Intranasal_Esketamine_for_Depression_National_Protocol_Rev_FEB2022.pdf



Version 4.0 – 2022



VA/DoD CLINICAL PRACTICE GUIDELINE FOR THE MANAGEMENT OF MAJOR DEPRESSIVE DISORDER

19.	For patients with MDD who have not responded to several adequate pharmacologic trials, we suggest ketamine or esketamine as an option for augmentation.	Weak for	Reviewed, New- replaced
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<https://www.healthquality.va.gov/guidelines/MH/mdd/>

VA



U.S. Department
of Veterans Affairs

VA's Ketamine/Esketamine Dissemination Strategy

1. Community of Practice for “Somatic Treatments”

- Email Group
- Monthly Meeting

2. Ketamine/Esketamine Special Interest Group

3. National Training Program for ketamine/esketamine clinical teams

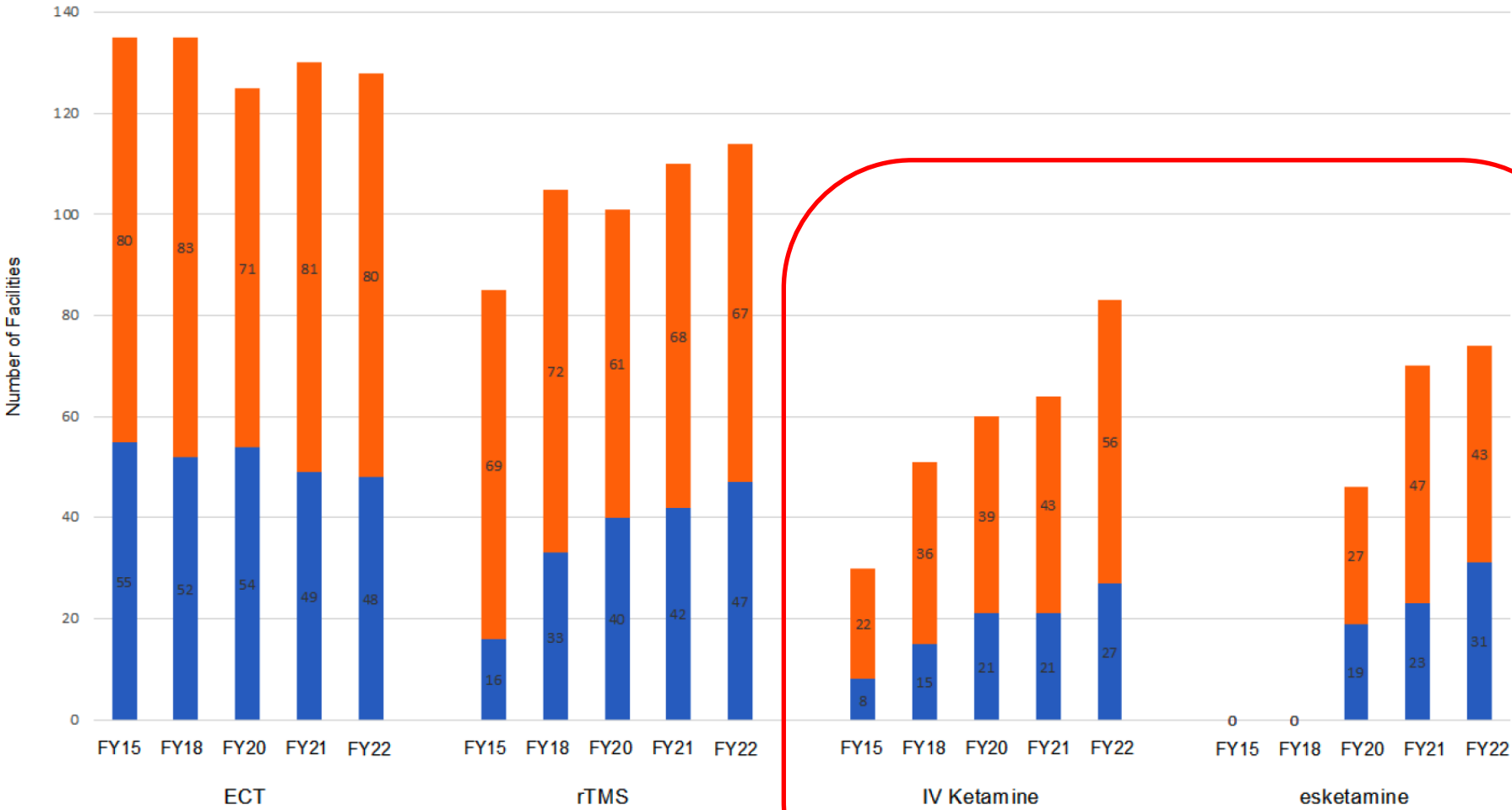
4. Information Hub

- Policy, guidance, support documents
- Data on Availability and Utilization

5. Technical Support for Implementation

6. Program Evaluation

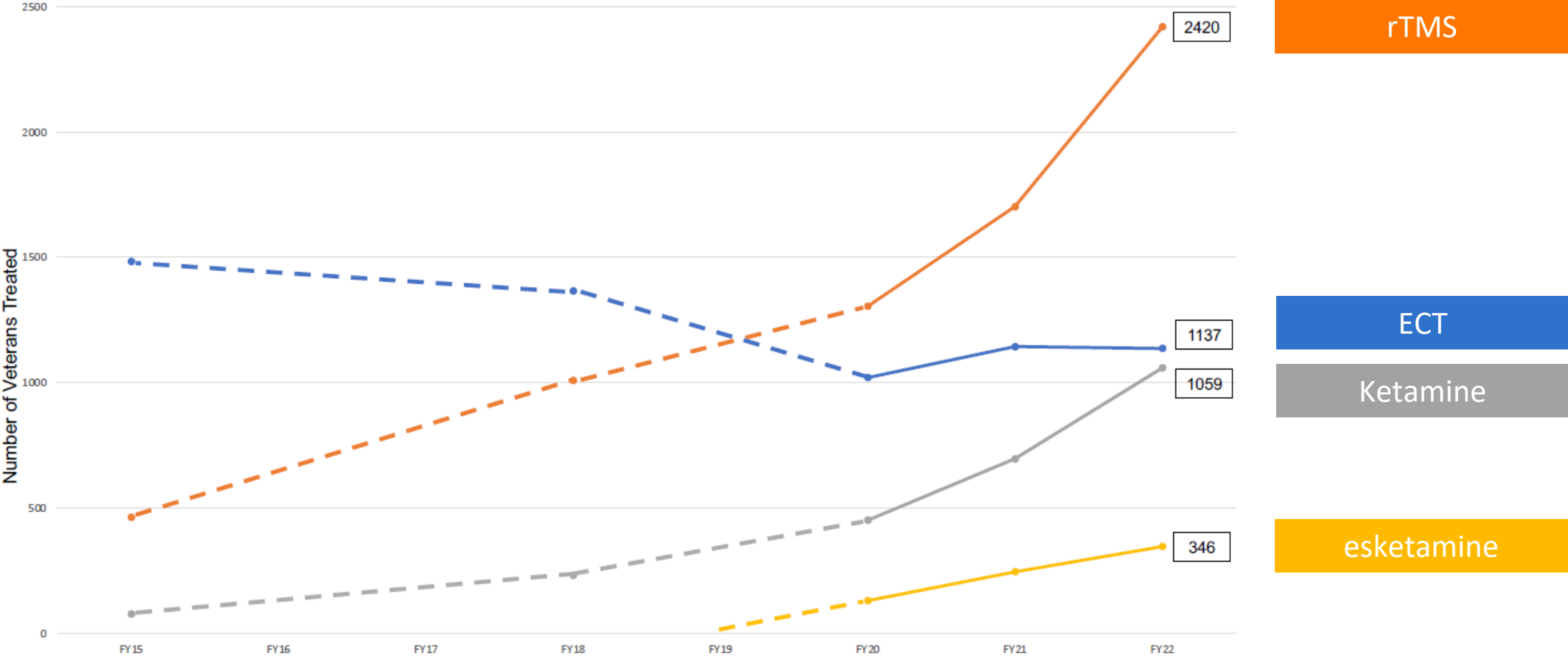
Ketamine and Esketamine Availability at VA Facilities



Available in a VA Facility

Available through Referral to the Community

Trends in ECT, rTMS, Ketamine, Esketamine Utilization Among Veterans



Somatic Treatments Facility Utilization Dashboard



Ketamine and Esketamine Availability Map

← Introduction

Treatment Type ● Esketamine ● Ketamine



Filter by Treatment Type

Esketamine ●

Ketamine ●

Esketamine Sites

30

Ketamine Sites

22

Clinical Outcomes of Intravenous Ketamine Treatment for Depression in the VA Health System

Paul N. Pfeiffer, MD; Jamarie Geller, MD; Dara Ganoczy, MPH; Jennifer Jagusch, MSW; John Carty, MD; Fe Erlita D. Festin, MD; William S. Gilmer, MD; Brian Martis, MD; Mohini Ranganathan, MD; Ilse R. Wiechers, MD; and Avinash Hosanagar, MD

J Clin Psychiatry 2024;85(1):23m14984

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VA



U.S. Department
of Veterans Affairs

- **Veterans who began treatment in 2020**
- **Population with Severe and Treatment Resistant Depression:**
 - Mean of 39 MH visits in the previous 6 months
 - 22% with inpatient stays
 - 13% prior rTMS
 - 18% prior ECT
- **Mean of 18 infusions (about 3 months)**
- **About 50% improved significantly**
- **26% reached response**

Table 1.

Characteristics of Patients Treated With IV Ketamine for Depression (N= 215)

Characteristic	n	%
Age, y		
18–25	1	0.5
26–45	93	43
46–65	89	41
66–75	27	13
76+	5	2
Gender		
Female	38	18
Male	177	82
Race/ethnicity		
White	178	83
Black	9	4
Asian American, Pacific Islander	4	2
American Indian, Alaskan Native	5	2
Unknown/multiracial	19	9
Hispanic	22	10
Comorbid diagnoses		
Posttraumatic stress disorder	150	70
Other anxiety disorder	108	50
Bipolar disorder	37	17
Major depressive disorder with psychotic features	26	12
Other psychotic disorder	6	3
Attention-deficit/hyperactivity disorder	13	6
Alcohol use disorder	58	27
Other substance use disorder	59	27
Personality disorder	25	12
Pain	169	79

Abbreviation: IV= intravenous.

Findings For Ketamine and Esketamine Deployment in VA

Overall: Increasing AVAILABILITY at VA facilities and UTILIZATION by Veterans

- Especially good as these are complex interventions requiring significant resources, care coordination, and presentation to a facility

Challenges for VA

- Rich Facilities getting Richer: Expansion is lead by facilities which already offer one intervention adding additional interventions
- Persisting Under-Treatment of Treatment Resistant Depression (TRD): Despite increasing utilization less than 2% of Veterans who may have TRD were treated in FY22 with any somatic treatment

Next steps For VA

1. Improve the Standardization of Delivery and Data Capture for Ketamine/Esketamine

- Recently Transitioned from retrospective report to real-time data capture
- Institute templated procedure across the system

2. Explore the Underutilization of Care for Veterans with TRD

- Identify barriers to specialized TRD evaluation and care.

3. Prepare for the Future: Psychedelic Assisted Psychotherapy

- Nine VA facilities “formally” integrate psychotherapy as part of ketamine or esketamine delivery

Contact

Eric Hermes, M.D.

National Director, Psychopharmacology and Somatic Treatments
Office of Mental Health, Veterans Health Administration

eric.Hermes@va.gov

Scope of Ketamine Use Clinical Practice

Discussion:

- **Steven P. Cohen, MD**, Northwestern University Feinberg School of Medicine, Uniformed Services University of Health Sciences
- **Eric Hermes, MD**, Veterans Health Administration, Yale University School of Medicine
- **Mikhail Kogan, MD**, George Washington University Center Integrative Medicine
- **Brittany O'Brian, PhD**, Baylor College of Medicine
- **Jessica Poole, NDAP, CRNA**, Pennsylvania Association of Nurse Anesthetists
- **Sandhya Prashad, MD**, American Society of Ketamine Physicians

Break

The meeting will resume at 11:10 am ET



Identifying Safety Concerns and Potential Risks Associated with the Use of Ketamine Products



Joseph Palamar, PhD, MPH
New York University Langone Health



Recreational Ketamine Use, Misuse of Prescribed Ketamine, and Associated Adverse Effects

Joseph J. Palamar, PhD, MPH

NYU Langone Health, Department of Population Health

June 27th, 2024

Conflicts

I have consulted for the Baltimore-Washington High Intensity Drug Trafficking Area (HIDTA) program (funded by the ONDCP)

I declare no other potential conflicts of interest

Current Funding

National Institute on Drug Abuse:

- R01DA060207 (PI: Palamar)
- R01DA057289 (PI: Palamar)
- U01DA051126 (PI: Cottler)

The History of Recreational Ketamine Use

Early recreational use and 'abuse'

- Might have occurred as early as 1967
- Some reports suggest that available as pills and powder on the 'street' in the 1970s
- Abuse first reported by the FDA in 1979
- By the mid-1980s, instances of addiction were reported
- Appeared in the nightclub scene in the early 1990s as an adulterant in ecstasy
- Soon after, it became sold on its own
- Widespread diversion (veterinary clinics)
- Between 1992 and 1999, the DEA received ~800 reports of sales and possession
- Scheduled by the DEA (Schedule III) in 1999

Siegel RK. Phencyclidine and ketamine intoxication: a study of four populations of recreational users. *NIDA Res Monogr.* 1978(21):119-147.

Jansen K. Ketamine: Dreams and Realities. Sarasota, FL: Multidisciplinary Association for Psychedelic Studies; 2000.

Ketamine abuse. *FDA Drug Bull.* 1979;9(4):24. Kamaya H, Krishna PR. Ketamine addiction. *Anesthesiology.* 1987;67(5):861-862.

Jansen KL. Non-medical use of ketamine. *BMJ.* 1993;306(6878):601-602.

Mion G. History of anaesthesia: The ketamine story - past, present and future. *Eur J Anaesthesiol.* 2017;34(9):571-575.

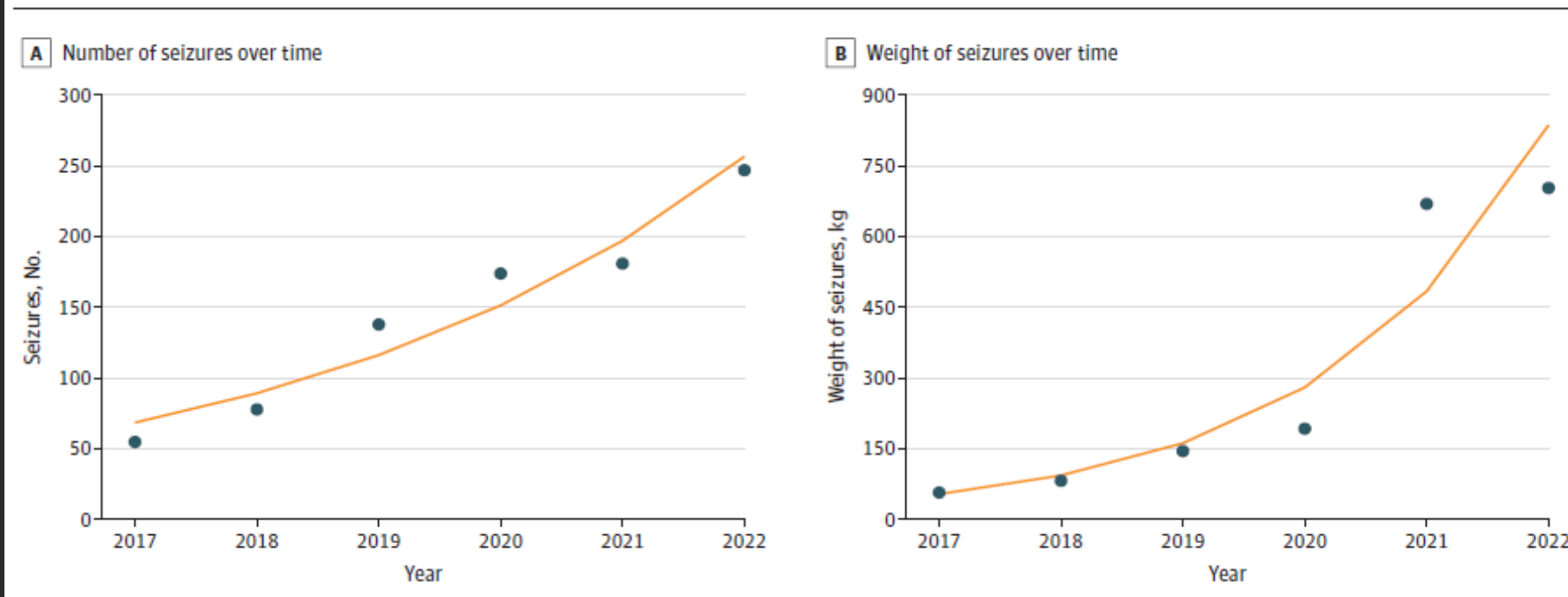
Law enforcement seizures

- Decades ago, most illicit ketamine was diverted from legitimate sources (e.g., veterinary clinics)
- Global production from clandestine laboratories in Southeast Asia (previously India)
- Most illicit product is now smuggled in through Mexico
- This version of ketamine is thus not pharmaceutical grade



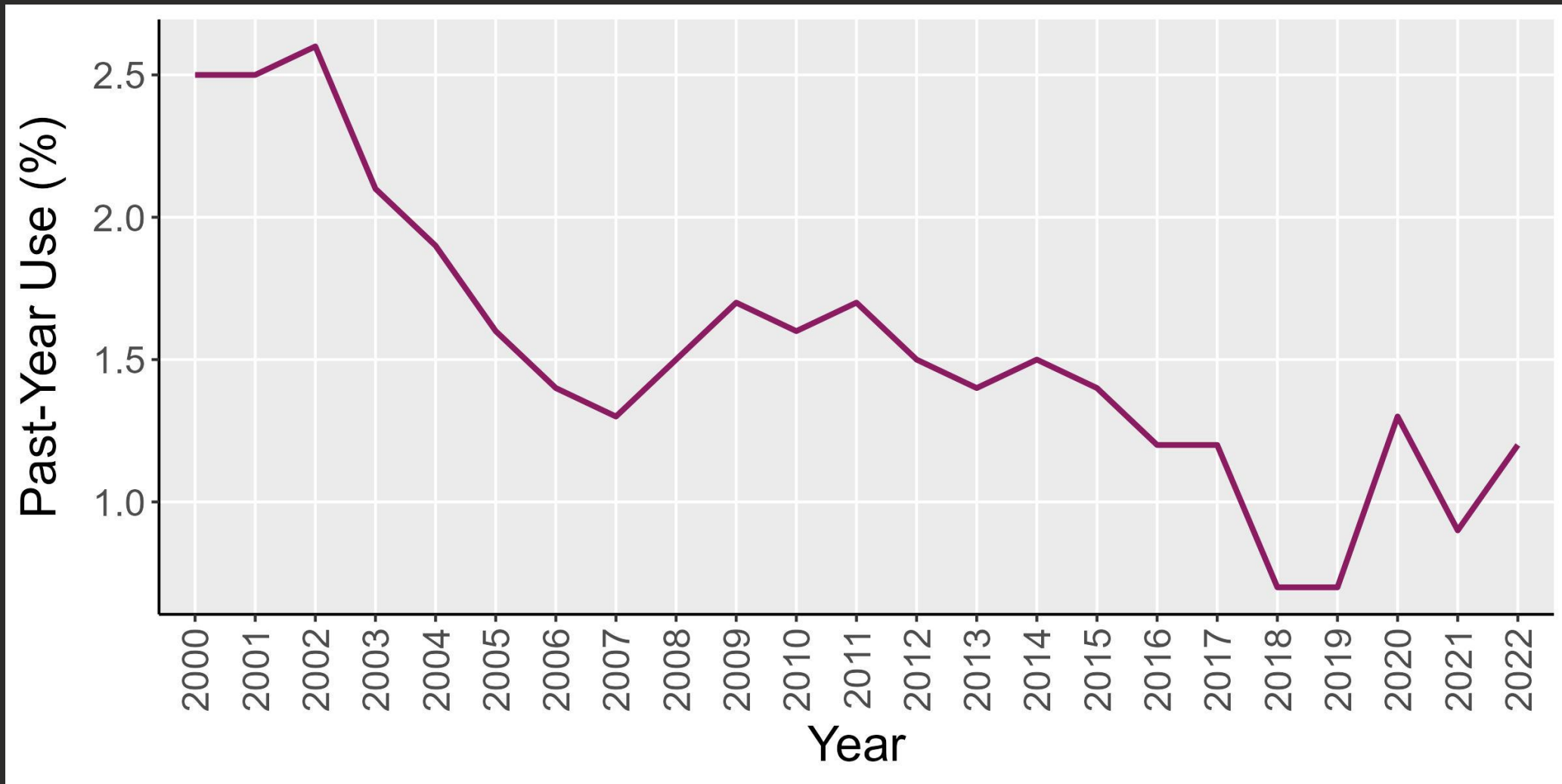
Ketamine law enforcement seizures in the US

Figure. Trends in Ketamine Seizures in the US From 2017 to 2022



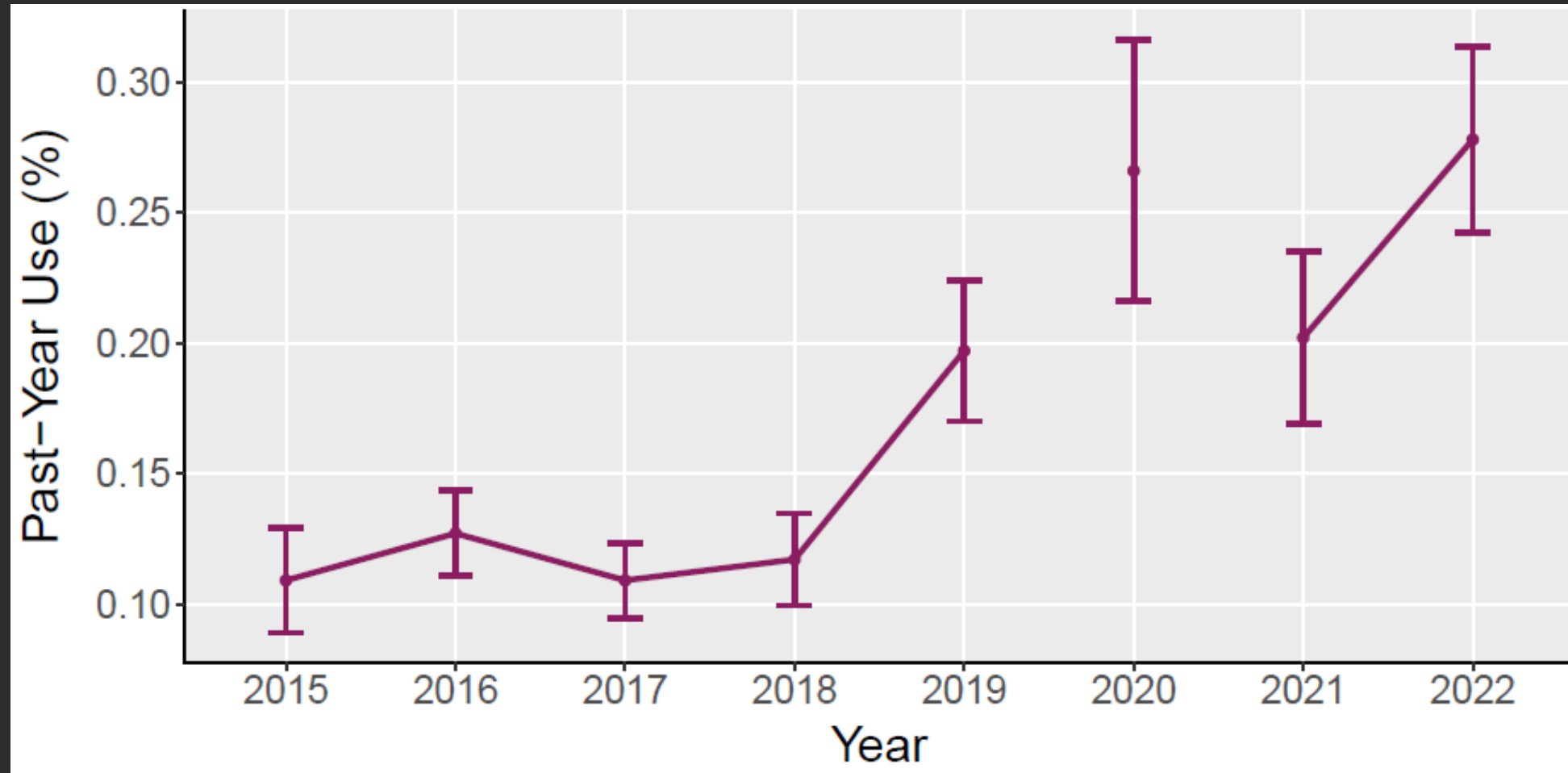
- The number of seizures increased 349% from 55 in 2017 to 247 in 2022
- 824 seizures in total weighing 4,084 lbs. (with one seizure weighing 1,591 lbs.)
- 99% in powder form
- Preliminary: in 2023, >350 seizures, >1,000 kg in powder

Ketamine use among high school seniors in the US



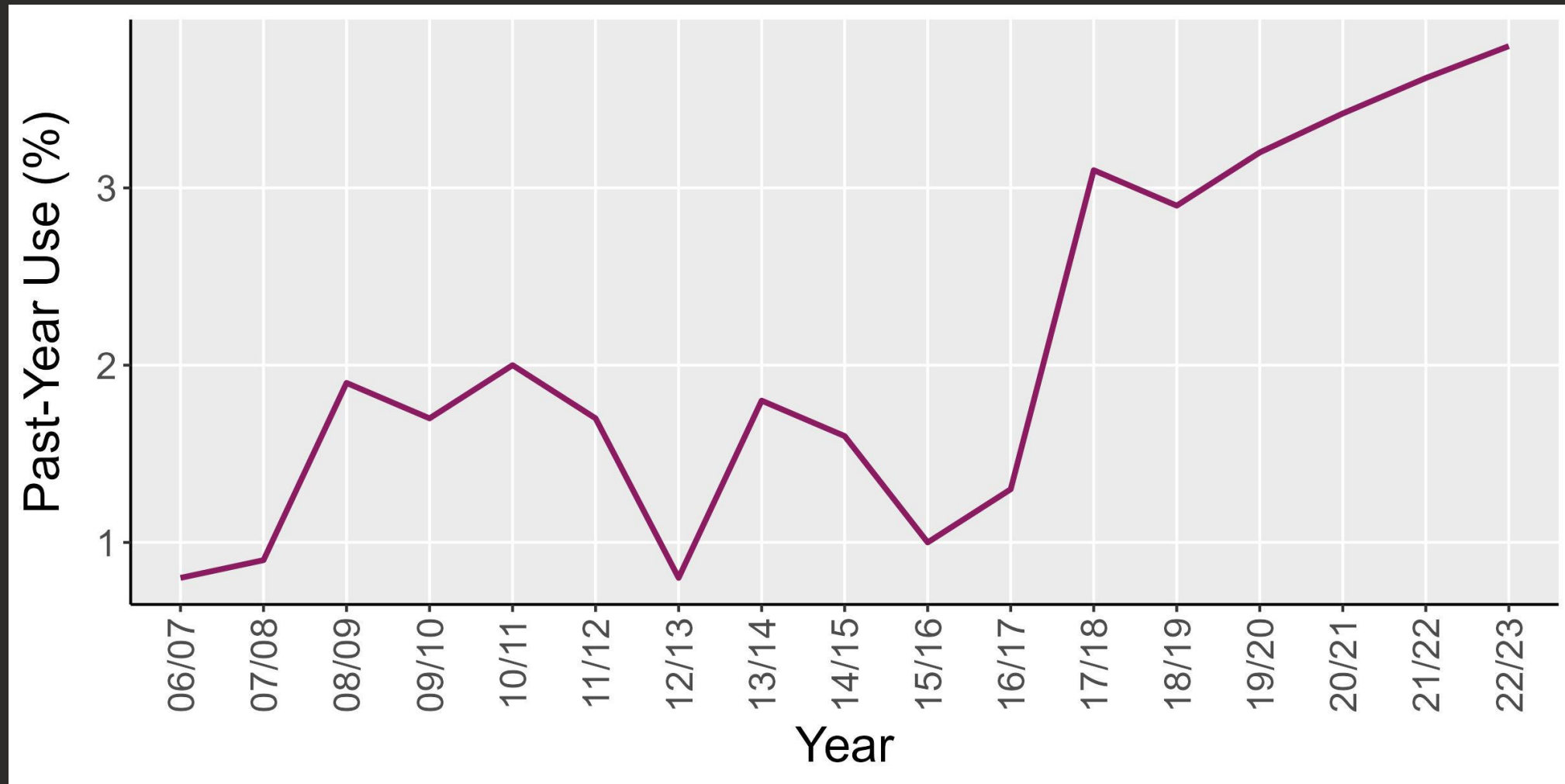
Miech RA, Johnston LD, Patrick ME, O'Malley PM, Bachman JG, Schulenberg JE. Monitoring the Future national survey results on drug use, 1975–2022: Secondary school students. Monitoring the Future Monograph Series. Ann Arbor, MI: Institute for Social Research, University of Michigan. 2023.

Ketamine use among young adults (aged 18+) in the US



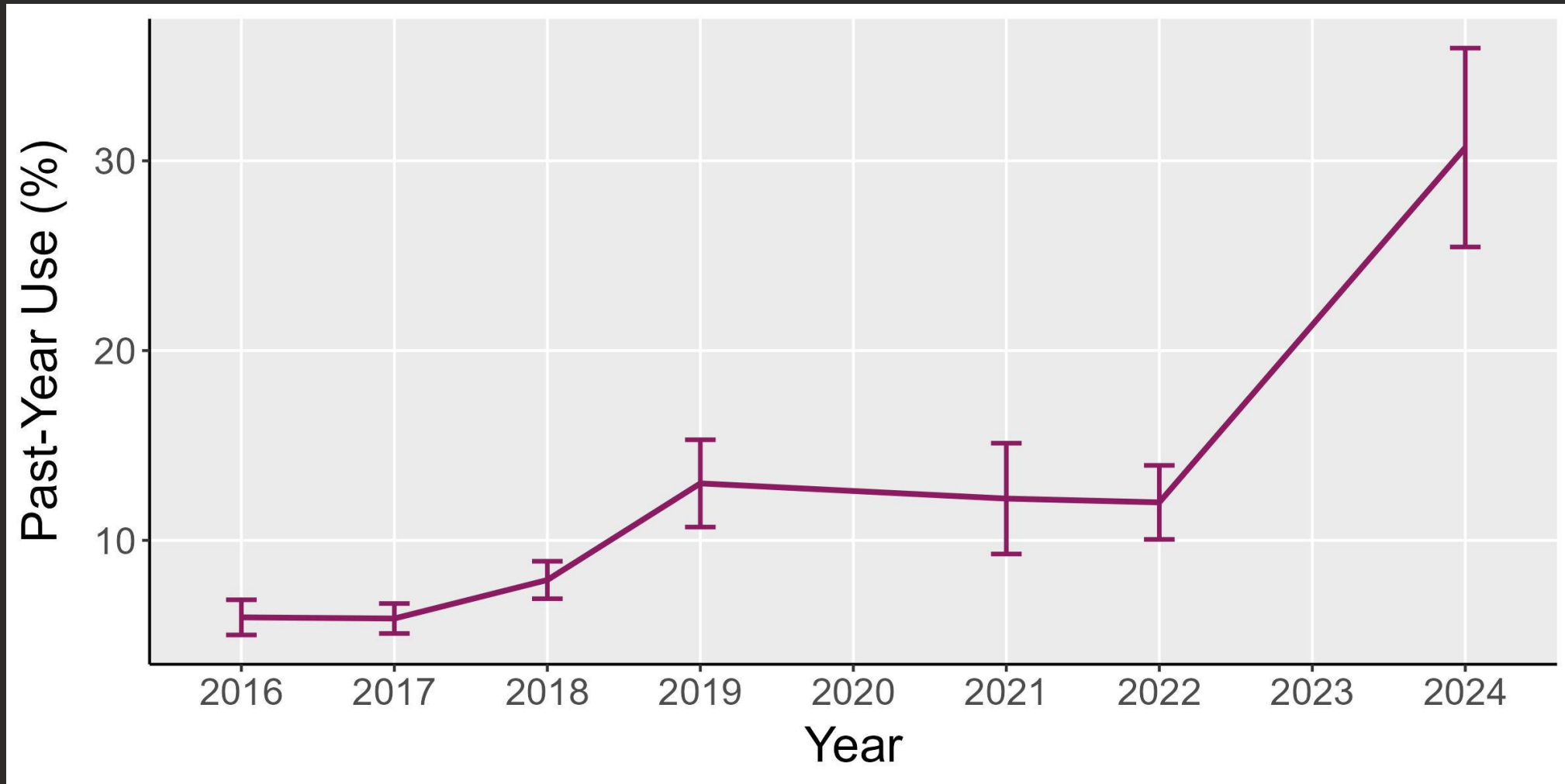
Note: Trend lines are plotted separately as trends are considered “broken” due to changes in the survey design

Ketamine use among young adults (aged 16-24) in the UK



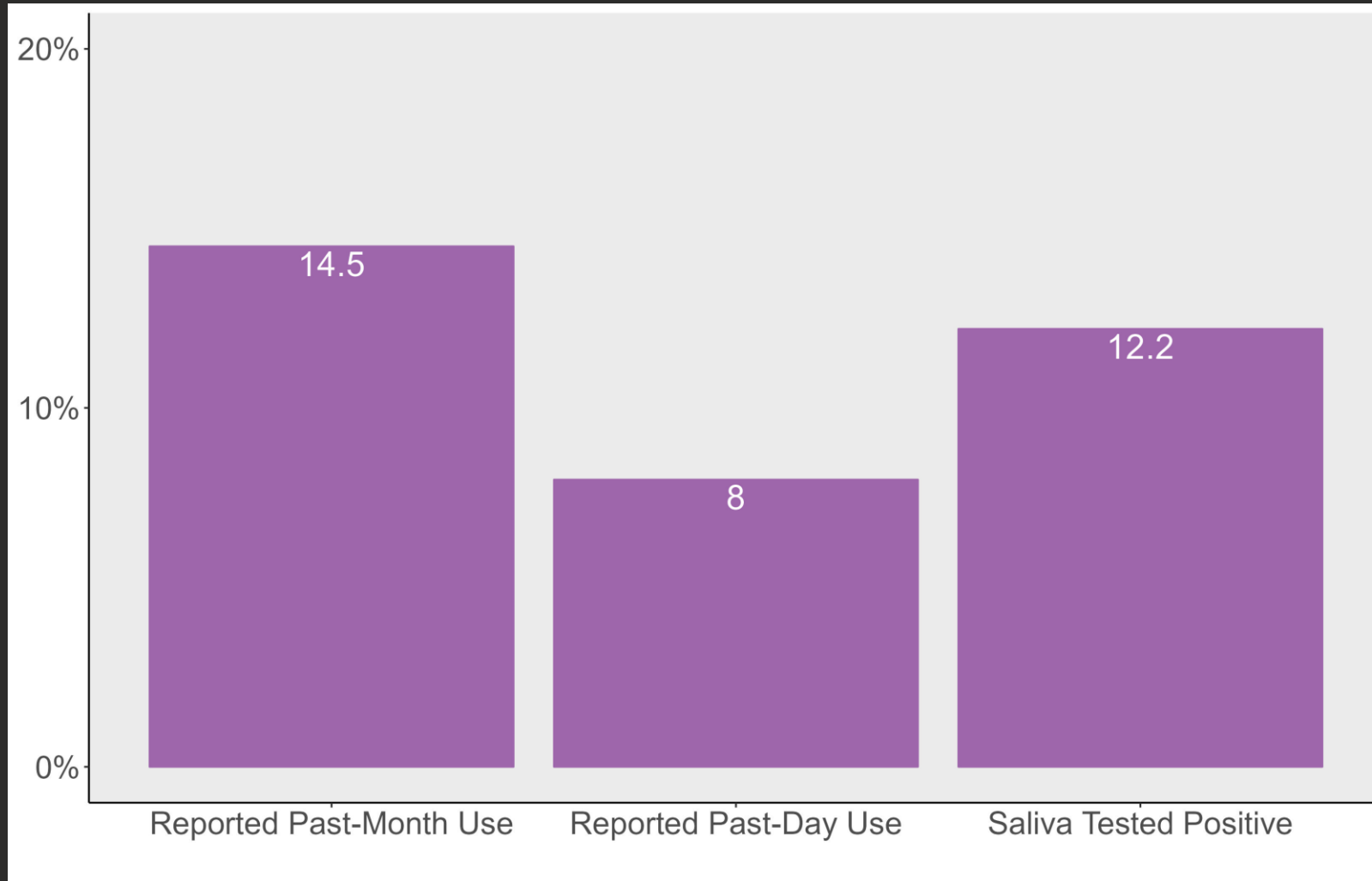
Note: Data were not collected during the COVID-19 pandemic

Ketamine use among NYC nightclub attendees



Note: 2024 represents Quarter 1 (January – March 2024)

Ketamine use among NYC nightclub attendees



Data collected from 2024 Quarter 1 (n=200). Saliva testing conducted using liquid chromatography quadrupole time-of-flight mass spectrometry (LC-QTOF-MS).

Effects



“It pretzels your thoughts into Mobius strips.”

“You see everything inside and out and curling all around itself...
There’s a lot of unfolding.”

James St. James, *Disco Bloodbath (Party Monster)*



General effects

- Numbness, passiveness, and perception that the world is not real
- Changed perception of body consistency or distortion of body parts
- Sensations of weightlessness or floating
- Absence or distortion of a sense of time or place
- Even small doses can lead to dissociation and hallucination
- Larger doses can lead to intense detachment from reality and perceived out-of-body experiences (“K-hole”)
- Effects can be seen as pleasurable or *horrific*
- Effects can thus impair judgment and impede functioning



Hansen G, Jensen SB, Chandresh L, Hilden T. The psychotropic effect of ketamine. *J Psychoactive Drugs*. 1988;20(4):419-425.

Jansen K. Ketamine: Dreams and Realities. Sarasota, FL: Multidisciplinary Association for Psychedelic Studies; 2000.

Schifano F, Corkery J, Oyefeso A, Tonia T, Ghodse AH. Trapped in the "K-hole": overview of deaths associated with ketamine misuse in the UK (1993-2006). *J Clin Psychopharmacol*. 2008;28(1):114-116. Image: flowvella.com. Ketamine.

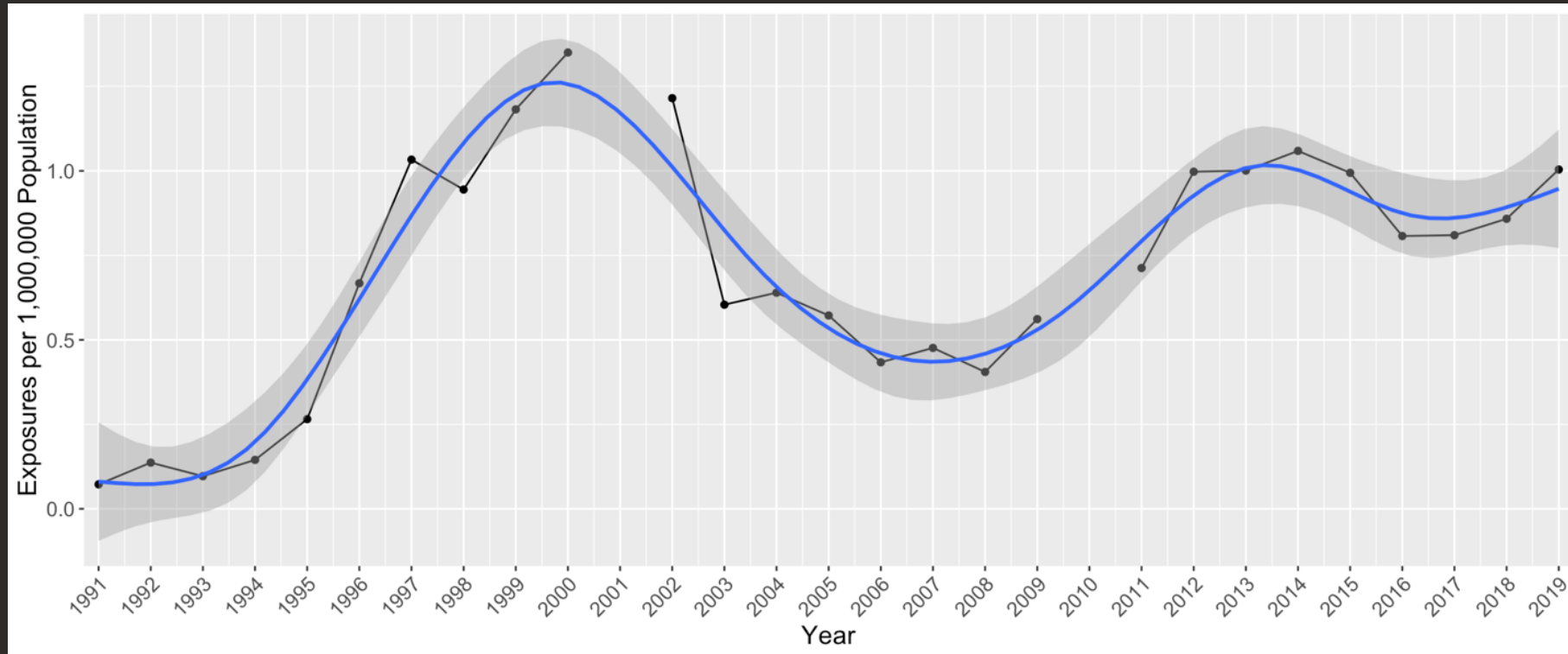
Adverse effects

- A fifth (19%) of NYC nightclub attendees who used ketamine in the past year reported a “harmful or very unpleasant” effect after use in which they were concerned about their immediate safety
- In our more recent study, 13% had experienced such an effect after use in the past month
- Of these, 59% asked someone for help and 7% visited an emergency department (ED)
- Confusion and nausea/vomiting were the most common symptoms
- The last year of Drug Abuse Warning Network data in 2011 estimated 1,550 ketamine-related ED visits in the US (with 71.5% of cases involving alcohol co-use)
- We at NDEWS are receiving reports of deaths in Chicago and Florida (April 2024)

Adverse effects

- In a study of ED presentations, the most common acute effects were impaired consciousness (45%), hypertension (40%), and tachycardia (39%)
- Acute risk of physical harm or death from accidents (e.g., drowning, car crashes)
- Vulnerable to physical and sexual assault
- Short- and long-term memory impairment
- Frequent ketamine use can lead to use disorder, driven by tolerance and craving
- Intense abdominal pain (“K-cramps”)
- Bladder issues such as ulcerative cystitis

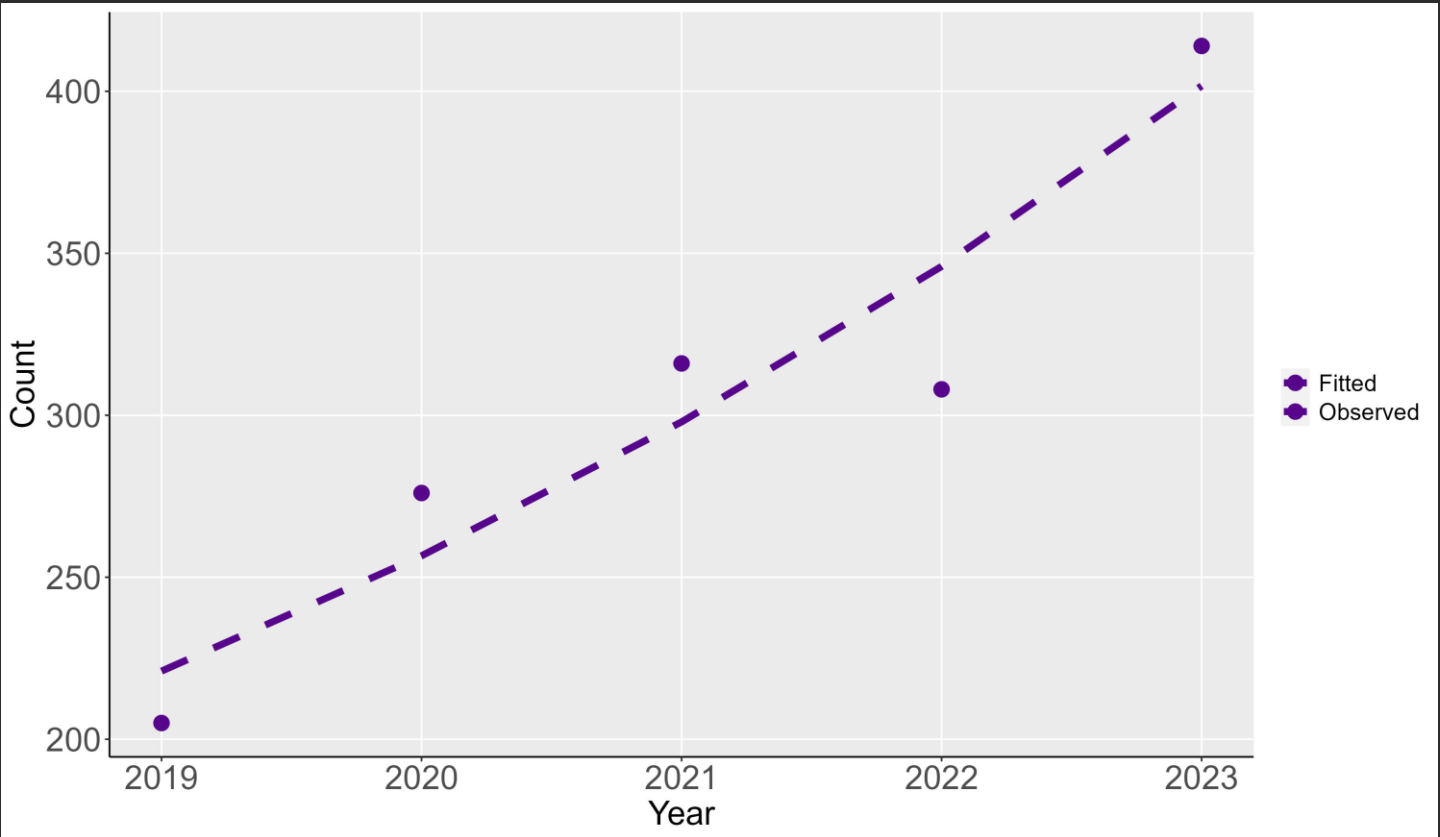
Ketamine-related poisonings in the US



- 5% of cases reported to Poison Control in 2019-2021 were age ≤ 12 suggesting risk for childhood exposure

Number of ketamine-related poisonings in the US

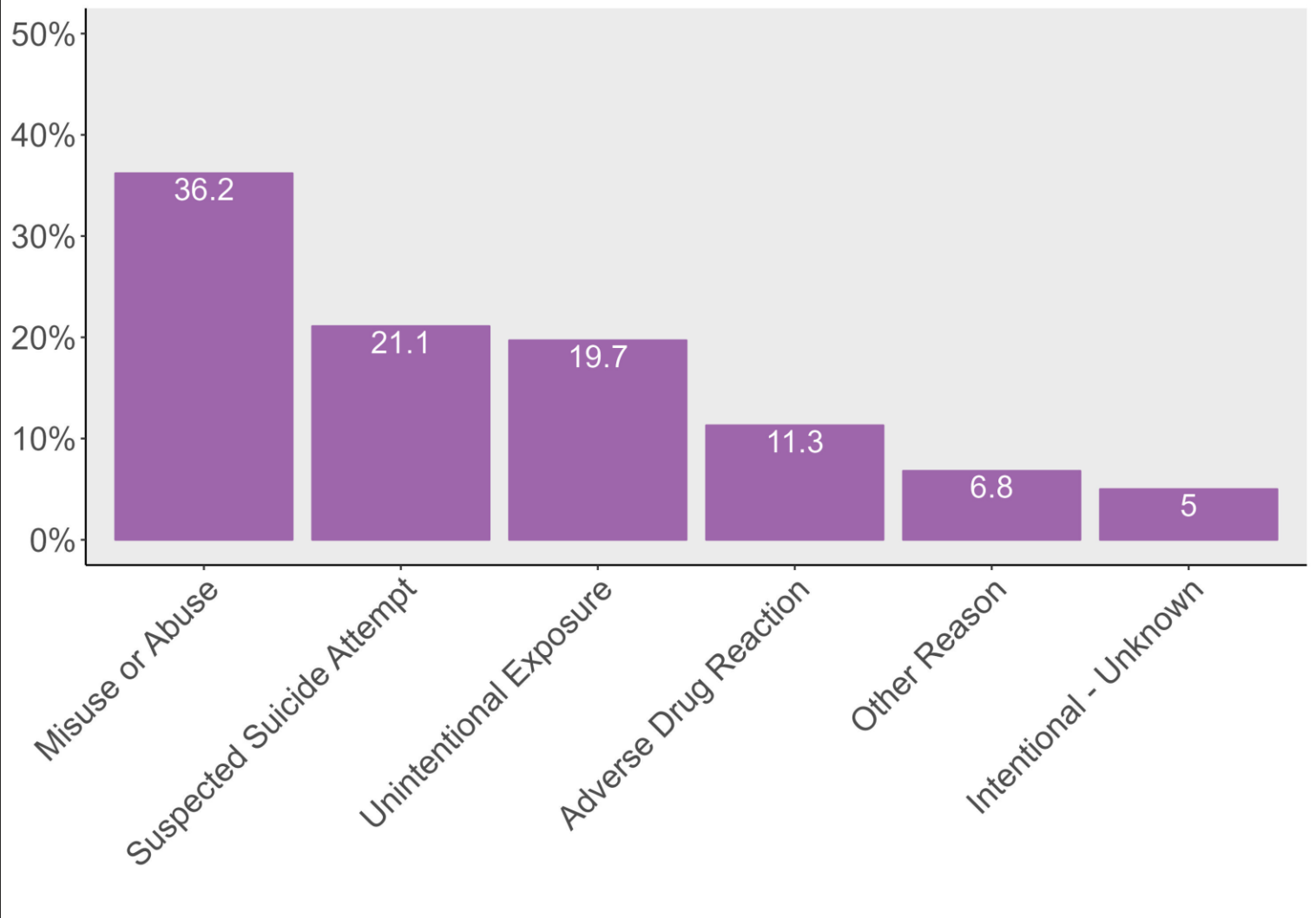
Preliminary analysis of data from 1,519 poisonings (“exposures”) reported to US poison centers, 2019-2023



Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program



Reasons for ketamine poisonings

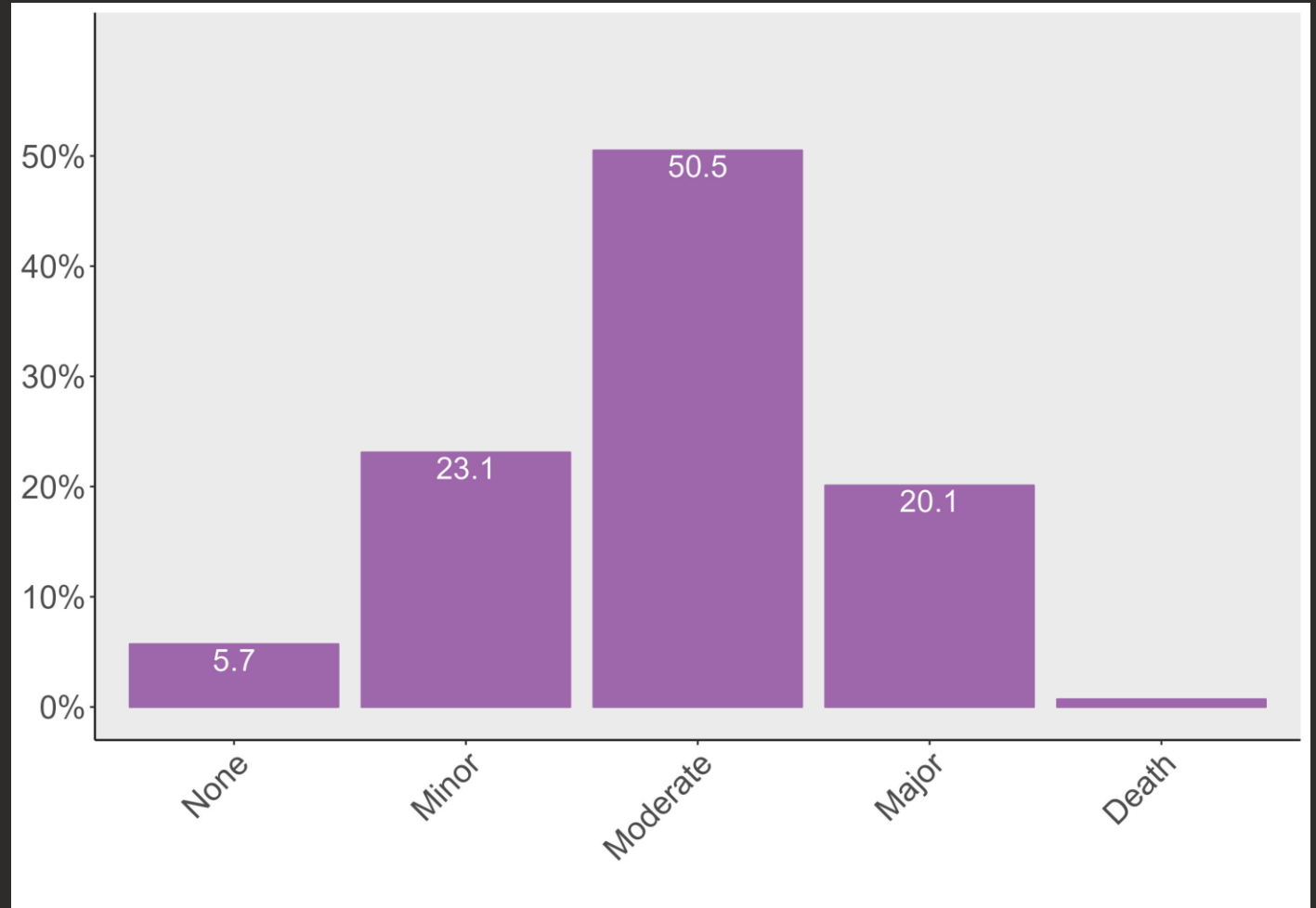


Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program



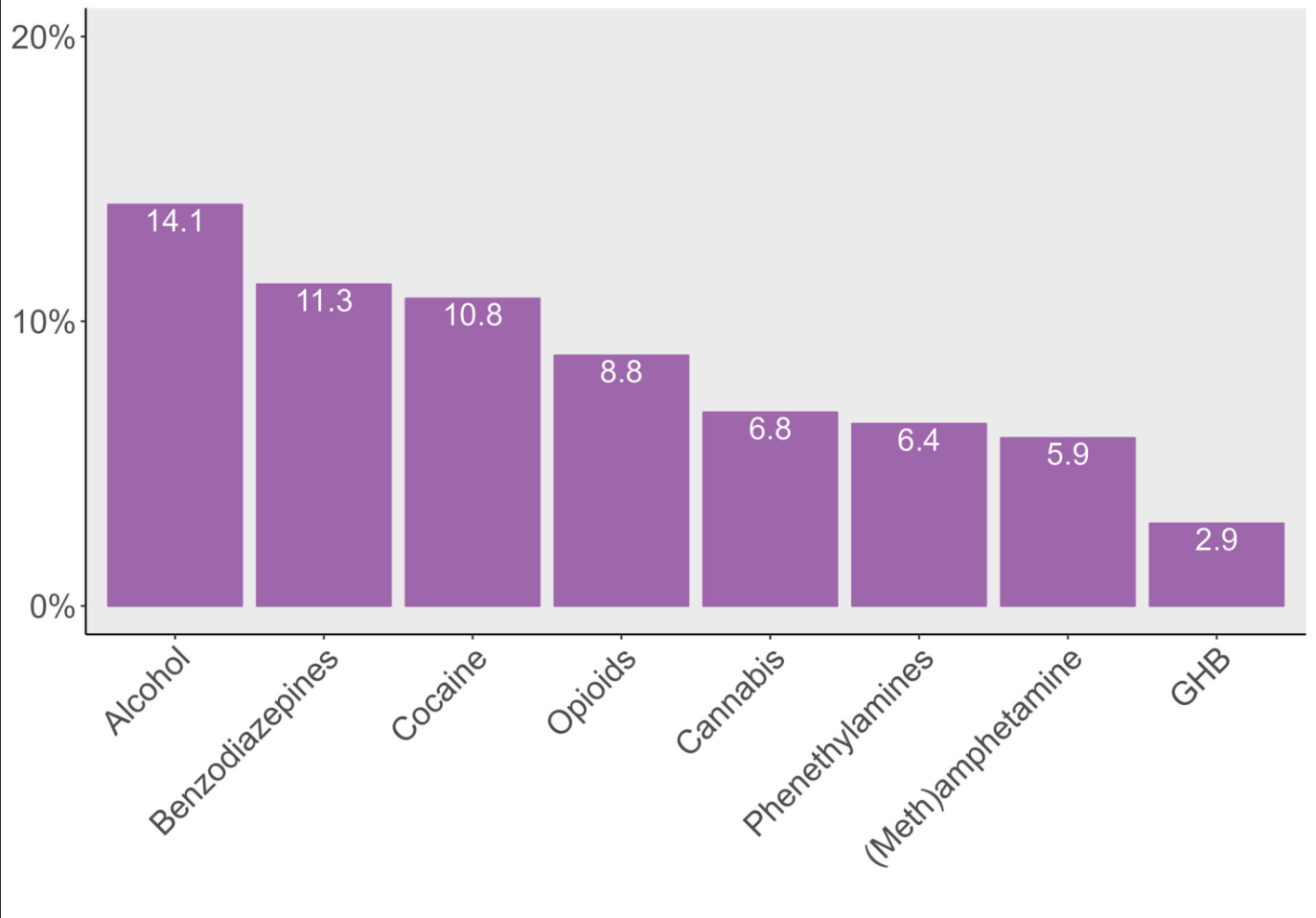
Severity of ketamine poisonings (misuse/abuse)

- **No effect:** no symptoms
- **Mild effect:** minimally bothersome
- **Moderate effect:** more pronounced or prolonged
- **Major effect:** life-threatening or permanently disabling
- **Death:** confirmed to have died in relation to use



Co-drug use involved in ketamine poisonings

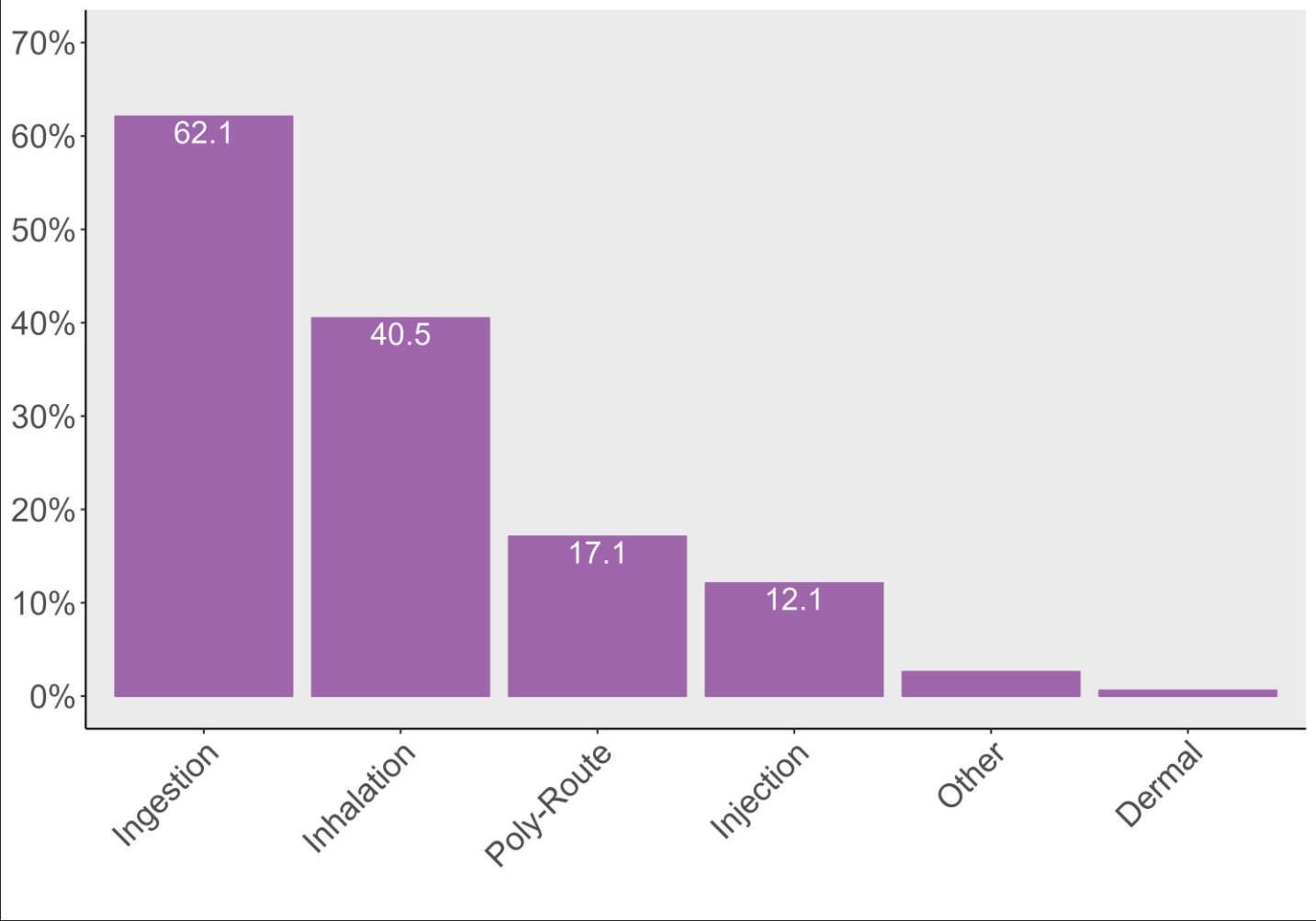
41% reported co-use of other drugs



Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program



Route of ketamine administration in poisonings

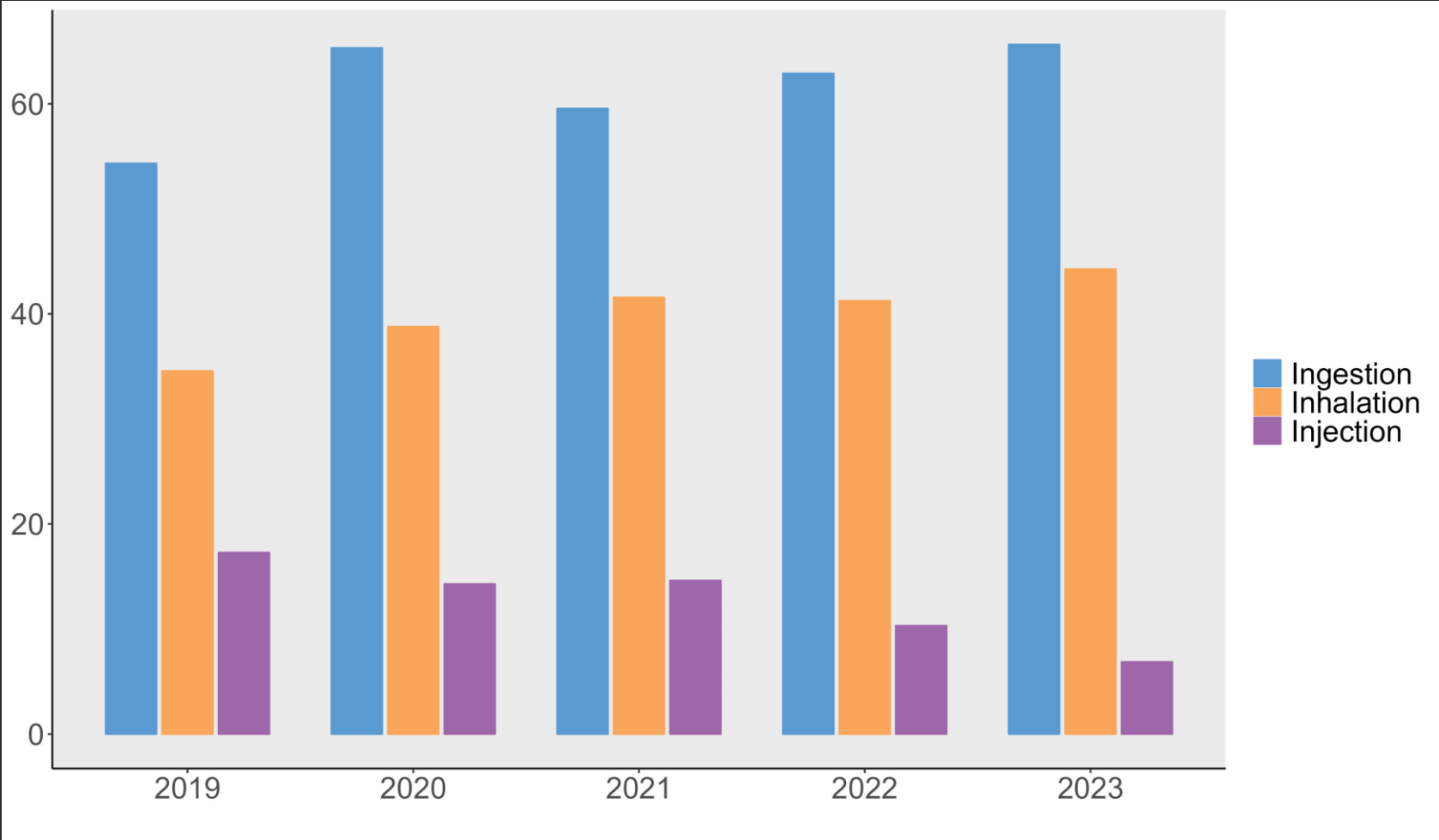


Note: 12.4% reported multiple routes of administration

Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program



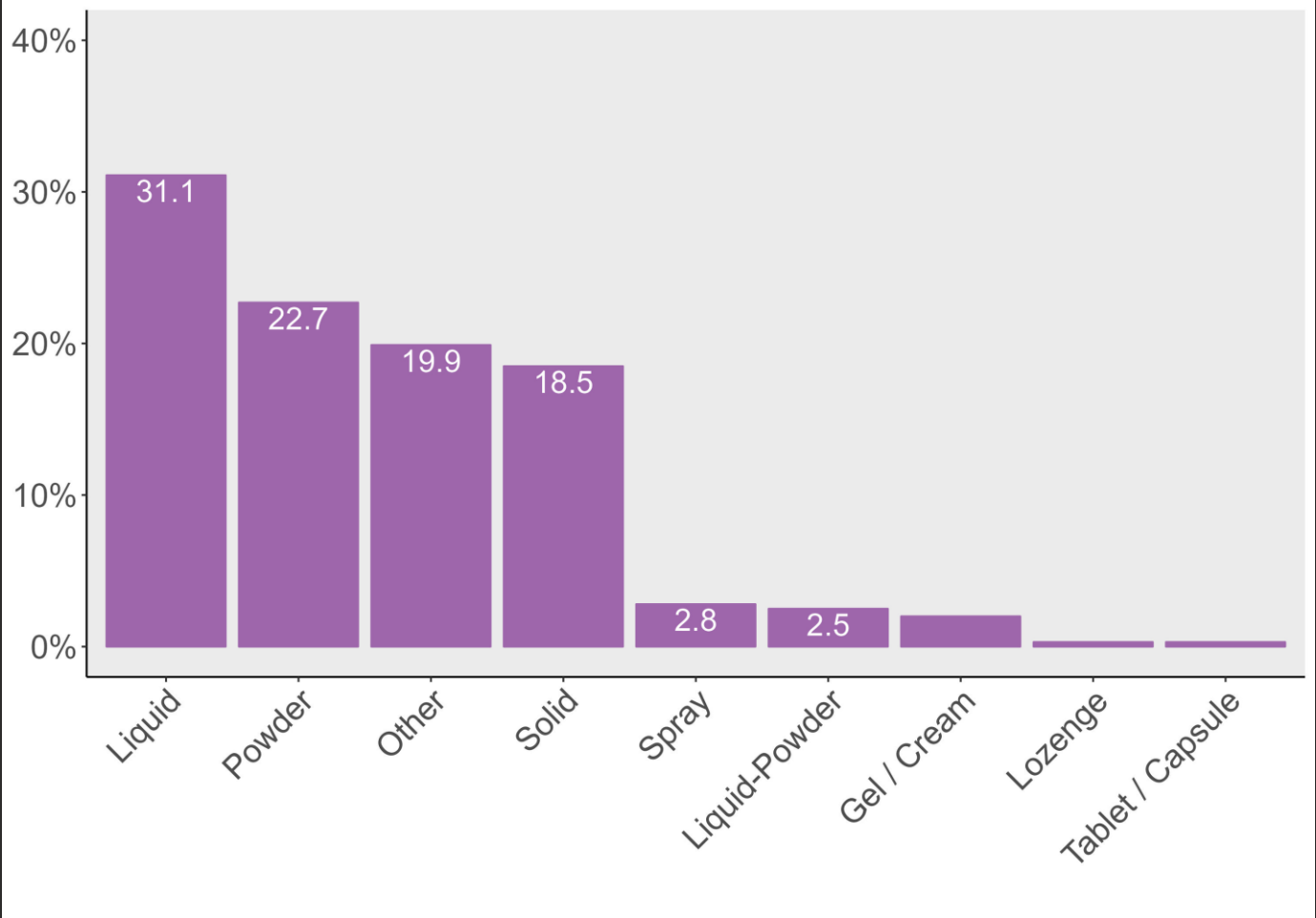
Route of ketamine administration in poisonings



Injection decreased by 60% ($p = .022$)

Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program

Form of ketamine involved in poisonings

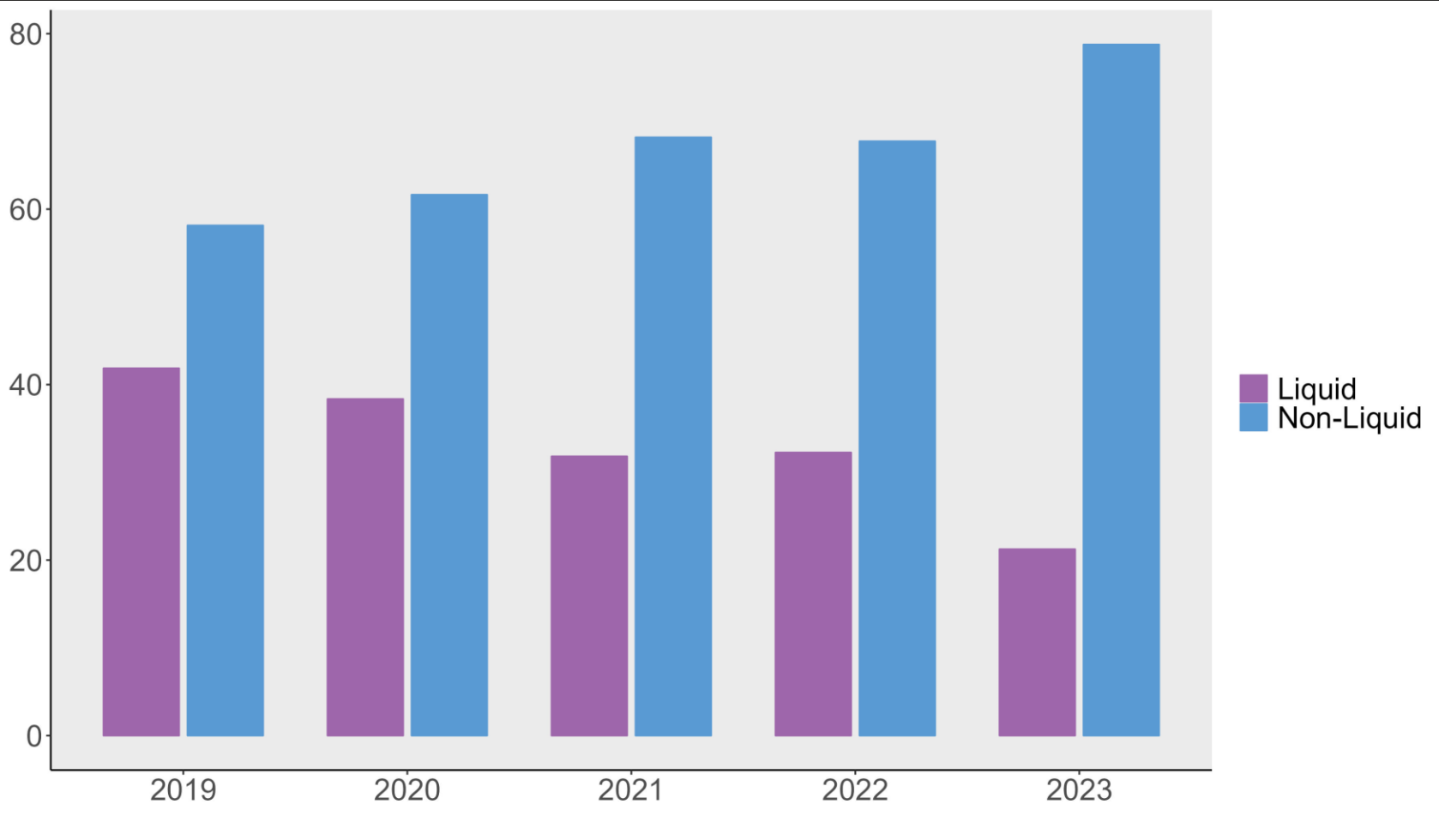


Note: “Solid” likely refers to powder or lozenges. “Liquid-powder” means that drug form was reported as liquid but subformulation was reported as powder.

Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program



Form of ketamine involved in poisonings over time



Non-liquid ketamine use increased by 35% ($p = .011$)

Data obtained through with National Drug Early Warning System (NDEWS) collaboration with the Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program

At-Home Psychiatric Treatment

Virtual prescribing

- Lozenges from compounding pharmacies
- Sometimes a “month supply” is prescribed
- In a few studies, very high dose (300-450 mg) rapid-dissolve tablets were mailed as a take-home treatment, with multiple tablets mailed to patients
- One doctor had prescribed ketamine to over 3,000 patients in 44 states in just three years. The DEA shut down his clinic in 2023



Hassan K, Struthers WM, Sankarabhotla A, Davis P. Safety, effectiveness and tolerability of sublingual ketamine in depression and anxiety: A retrospective study of off-label, at-home use. *Front Psychiatry*. 2022;13:992624.

Hull TD, Malgaroli M, Gazzaley A, Akiki TJ, Madan A, Vando L, Arden K, Swain J, Klotz M, Paleos C. At-home, sublingual ketamine telehealth is a safe and effective treatment for moderate to severe anxiety and depression: Findings from a large, prospective, open-label effectiveness trial. *J Affect Disord*. 2022;314:59-67.

Gilbert D. This doctor prescribed ketamine from his home. DEA shut it down. *Washington Post*. May 10, 2023.

Image: [balancedmentalwellness.com](https://www.balancedmentalwellness.com). Psychotherapy with Ketamine Troches: Age Guidelines

Risks Associated with Unsupervised Use

Seven Concerns

Dysphoric Reactions With No Supervision

Patient Self-Harm or Harm to Others

Diversion

Stockpiling and Use of Large Doses

Alternate Routes of Administration

Ketamine Use Disorder

Seeking Illegal Supply After Introduced

“Street” price is much cheaper than for other prescription drugs

Continued Surveillance is Needed

- We need to better understand the drivers of ketamine misuse and adverse effects
- Research is needed to monitor the quickly changing legal *and* illegal ketamine landscape
- Research is needed to determine how much off-label prescribed ketamine has reached the black market
- We need this information to inform:
 - Policy decisions (regarding regulation, control, and advertising)
 - Prevention (to educate people about risks associated with use)
 - Treatment (for those experiencing problematic use)
 - Harm reduction (informing ketamine use in a safer manner)

Acknowledgments

- National Drug Early Warning System (NDEWS)
- Researched Abuse Diversion and Addiction-Related Surveillance (RADARS) System Poison Center Program
- High Intensity Drug Trafficking Areas (HIDTA)
- NPS Discovery

Funding

National Institute on Drug Abuse:

- R01DA060207 (PI: Palamar)
- R01DA057289 (PI: Palamar)
- U01DA051126 (PI: Cottler)



Thank You

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Briefing:



Identifying Safety Concerns and Potential Risks Associated with the Use of Ketamine Products

Megan Ehret, PharmD, MS, BCPP

University of Maryland Baltimore School of Pharmacy



UNIVERSITY *of* MARYLAND
SCHOOL OF PHARMACY

Patient Safety and Managing Adverse Effects of Ketamine

Megan J. Ehret, PharmD, MS, BCPP
Professor; Co-Director Mental Health Program
Department of Practice, Sciences, and Health
Outcomes Research

Tolerability and Safety

- Psychiatric
- Neurologic/Cognitive
- Hemodynamic
- Genitourinary
- Abuse liability

Psychiatric

- Dissociation
 - Decreases with subsequent administration
 - Peaks within 40 minutes
 - Resolves in 1-2 hours
 - Clinician-Administered Dissociative States Scale (CADSS)
- Psychotomimetic
 - Pre-existing vulnerability

Short B, et al. Lancet Psychiatry 2018;5:65-78.

Malhotra AK, et al. Neuropsychopharmacology 1997;17:141-150.

Neurologic/Cognitive

- Dizziness, drowsiness, light-headedness
- Long-term exposure: cellular or molecular evidence of neurotoxicity?

Hemodynamic

- Cardiac-stimulating effects
 - Increase in heart rate and blood pressure (10-50%)
 - Observed within 20-50 minutes of treatment
 - Resolve in 2-4 hours
 - 20-30% >180-100 mmHg and/or \geq 110 b/min
 - ~20% may require pharmacologic treatment of hypertension
 - Palpitations, arrhythmias, chest pain, and hypotension

Szarmach J, Et al. Psychiatr Danub 2019;31:585-90.

Rodrigues NB, et al. Expert Opin Drug Saf 2020;19:1031-40.

Short B, et al. Lancet Psychiatry 2018;5:65-78.

Correia-Melo FS, et al. J Affect Disord 2020;527-34.

Genitourinary

- Lower urinary tract symptoms (20-40%; recreationally)
 - Nocturia
 - Painful hematuria
 - Dysuria
 - Urinary urgency
 - Incontinence
- Dose-dependent relationship: ketamine exposure and probability of experiencing symptoms

Abuse Liability

- Healthy adults and recreational polydrug users: increased liking for ketamine
 - Concern for potential misuse and/or sensitization to other drugs of misuse
- Ketamine's effect on opioidergic systems- presage sensitization of drug reward substrates

George MS. Am J Psychiatry 2017;174:695-96.

Morgan CJA, et al. Psychol Med 2008;38:1331-40.

Esketamine Vs. Ketamine- REMS?

- REMS- designed to help reduce the occurrence or severity of a particular serious adverse event for a single medication or class of medications
- Esketamine
 - Risk of sedation, dissociation, and respiratory depression after administration

Identifying Safety Concerns and Potential Risks Associated with the Use of Ketamine Products

Discussion:

- **Francesca Cunningham, PharmD**, U.S. Department of Veterans Affairs
- **Megan Ehret, PharmD, MS, BCPP**, University of Maryland Baltimore School of Pharmacy
- **Joseph Palamar, PhD, MPH**, New York University Langone Health
- **Mark Rogge, PhD**, University of Florida School of Pharmacy
- **Eric Schwenk, MD**, Thomas Jefferson University

Lunch

The meeting will resume at 1:15 pm ET



Policy and Regulatory Challenges for the Medical Use of Ketamine



Seth Mailhot, JD,
Husch Blackwell



HUSCH BLACKWELL



Policy and Regulatory Challenges for the Medical Use of Ketamine: State Review

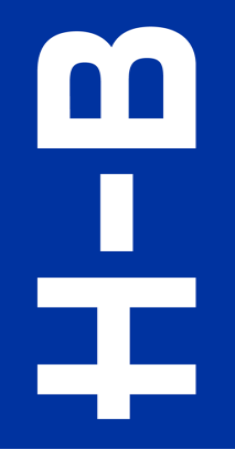
Seth A. Mailhot, Partner

Head, FDA Practice



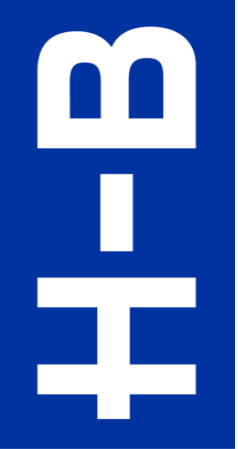
General Status

- Ketamine can be administered by practitioners who are licensed to prescribe Schedule III controlled substances within medical specialties, including anesthesiology, psychiatry, emergency medicine, primary care, and internal medicine
- Esketamine is restricted to administration by practitioners who are licensed to prescribe Schedule III controlled substances within mental health care, primary care, and internal medicine



Corporate Practice of Medicine (CPOM) Doctrine

- Prohibits corporations from practicing medicine or employing a physician to provide professional medical services
- Public policy concerns:
 1. allowing corporations to practice medicine or employ physicians will result in the commercialization of the practice of medicine,
 2. a corporation's obligation to its shareholders may not align with a physician's obligation to his patients, and
 3. employment of a physician by a corporation may interfere with the physician's independent medical judgment
- Impacts the ownership and operation of ketamine clinics



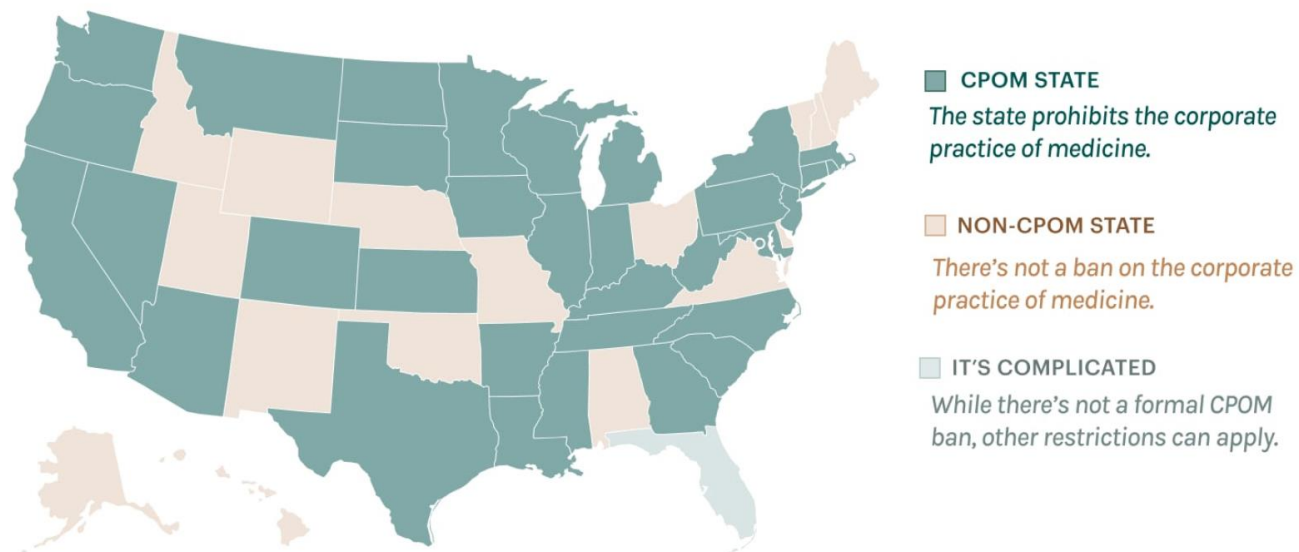
State CPOM Restrictions

- Thirty-two (32) states plus the District of Columbia prohibit the corporate practice of medicine
- Every one of these states provides an exception for professional corporations, which are corporations organized for the specific purpose of rendering a professional service
 - State statutes often specify how the professional corporations should be structured, who can participate as shareholders or owners and who must serve on the board of directors
 - Most states restrict the shareholders, owners, or board of directors of a professional corporation to persons licensed to render the same professional service as the professional corporation
- Many states also provide an exception for employment of physicians by certain entities, although the scope varies by state
- Seventeen (17) states do not have some form of CPOM restriction
- Florida also lacks a formal CPOM restriction but requires special licensure for non-physician owned clinics

State CPOM Restrictions (cont.)

CPOM States and Non-CPOM States: A Guide by Permit

Permit Health's guide to prohibitions on the corporate practice of medicine (CPOM)





Supervision of Advanced Practice Providers

- Advanced Practice Provider: health care provider who is not a physician but who performs medical activities typically performed by a physician, such as a nurse practitioner or physician assistant
- In some states, Advanced Practice Registered Nurses may prescribe controlled substances without supervision, but in other states supervision may be required
- South Carolina, Georgia, and New York require a written collaboration agreement between the supervising physician and the Advance Practice Provider
- California, Georgia, and Virginia limit the number of prescribing Advance Practice Providers that a physician may supervise at one time
- Georgia limits the distance permitted between the Advance Practice Provider and the supervising physician when the physician's office is out-of-state



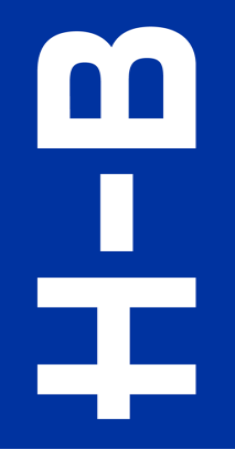
State Guidance and Laws Related to Ketamine

- Utah: 58-1-510. “Anesthesia and sedation requirements -- Unprofessional conduct -- Whistleblower protection” places requirements on various sedation levels in an outpatient setting, implicating use of ketamine, including
 - healthcare personnel to have certain training,
 - direct supervision of the patient, and
 - “having at least one individual in the procedure room who has advanced airway training and the knowledge and skills to recognize and treat airway complications and rescue a patient who entered a deeper than intended level of sedation”
- SB197, passed last year, modifies 58-1-510 to allow an anesthesia provider who is providing ketamine for a non-anesthetic purpose to have an individual with airway training on site rather than in the procedure room



State Guidance and Laws Related to Ketamine (cont.)

- Arizona: State Board of Nursing issued an advisory opinion on when Registered Nurses are operating within their scope of practice with respect to administering ketamine for various indications (pain control/analgesia, depression, and sedation), but not anesthesia
- Florida: State Department of Health issued a series of rulings allowing registered nurses with Advanced Cardiovascular Life Support training to administer low doses of ketamine (up to 0.5mg/kg) provided it does not rise to the level of sedation or analgesia
 - Rulings concluded that registered nurses cannot administer ketamine if the administration will result in sedation or analgesia, in contrast to American Nurses Association's Procedural Sedation Consensus Statement



State Guidance and Laws Related to Ketamine (cont.)

- Oregon: State Department of Justice issued an opinion that the infusion of sub-anesthetic doses of ketamine for the treatment of disorders of mood, anxiety, trauma, and stressors resistant to medication and psychotherapy in an outpatient clinic setting is within the scope of practice for Certified Registered Nurse Anesthetists (CRNA)
 - Disorder must be determined by a licensed independent health care practitioner
 - Assumes that the CRNA owns and manages clinic where treatment occurs



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QUESTIONS?



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Seth Mailhot is a Partner and lead of the FDA Regulatory Practice Group in Husch Blackwell's Washington D.C. office. His 14 years working in the U.S. Food and Drug Administration (FDA) has provided him a unique perspective when counseling clients on a broad range of matters involving the FDA.

Seth's practice includes representation of the medical device, pharmaceutical, dietary supplement, tobacco and food industries, and covers both premarket and post-market issues. His practice is focused on development of premarket submission strategies, and FDA enforcement of good manufacturing practices, both domestically and abroad.

Admissions

- California
- District of Columbia
- Massachusetts
- U.S. Patent and Trademark Office

Education

- New England School of Law, J.D., Valedictorian, *summa cum laude*
- University of Massachusetts, B.S., Chemical Engineering

Policy and Regulatory Challenges for the Medical Use of Ketamine

A.J. Day, PharmD, RPh,
National Community Pharmacists Association

POLICY AND REGULATORY CHALLENGES FOR THE MEDICAL USE OF KETAMINE

June 27, 2024

A.J. Day, PharmD

National Community Pharmacists Association

Compounding Steering Committee Member

FDA Compounding Risk Alerts

FDA alerts health care professionals of potential risks associated with ketamine nasal spray

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February 16, 2022

Background

FDA has become aware of safety reports involving compounded ketamine products used to treat psychiatric disorders which may be putting patients at risk. These products are not FDA-approved, which means FDA has not evaluated their safety and quality prior to marketing.

FDA warns patients and health care providers about potential risks associated with compounded ketamine products, including oral formulations, for the treatment of psychiatric disorders

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October 10, 2023

What Patients and Health Care Providers Should Know

There is increased interest in compounded ketamine products (including oral formulations) for the treatment of psychiatric disorders. When considering use of compounded ketamine products, patients and health care providers should know:

Industry Confusion

- FDA Risk Alerts state
 - Ketamine is not FDA approved for the treatment of any psychiatric disorder
 - Compounded drugs are not FDA approved
 - Use of compounded ketamine without monitoring by health care provider...may put patients at risk for serious adverse events
 - Known safety concerns associated with the use of ketamine products...
- FDA Risk Alerts do **NOT** state
 - Using compounded ketamine is illegal in any way
 - Off-label use of ketamine is not allowed
 - Patient-administered ketamine is not allowed

Industry Confusion – Feb 2022 Risk Alert

References

¹ Approved Risk Evaluation and Mitigation Strategies (REMS). Accessed February 8, 2022. Available at [Spravato \(esketamine\)](#).

² Olney, J. W., Labruyere, J., & Price, M. T. (1989). Pathological changes induced in cerebrocortical neurons by phencyclidine and related drugs. *Science*, 244(4910), 1360–1362.

³ Drug Approval Package: Spravato (2019). Pharmacology Review(s). Accessed February 8, 2022. Available at https://www.accessdata.fda.gov/drugsatfda_docs/nda/2019/211243Orig1s000TOC.cfm.

- Administered PCP, PCP-like substance, tiletamine, and ketamine subcutaneously to rats

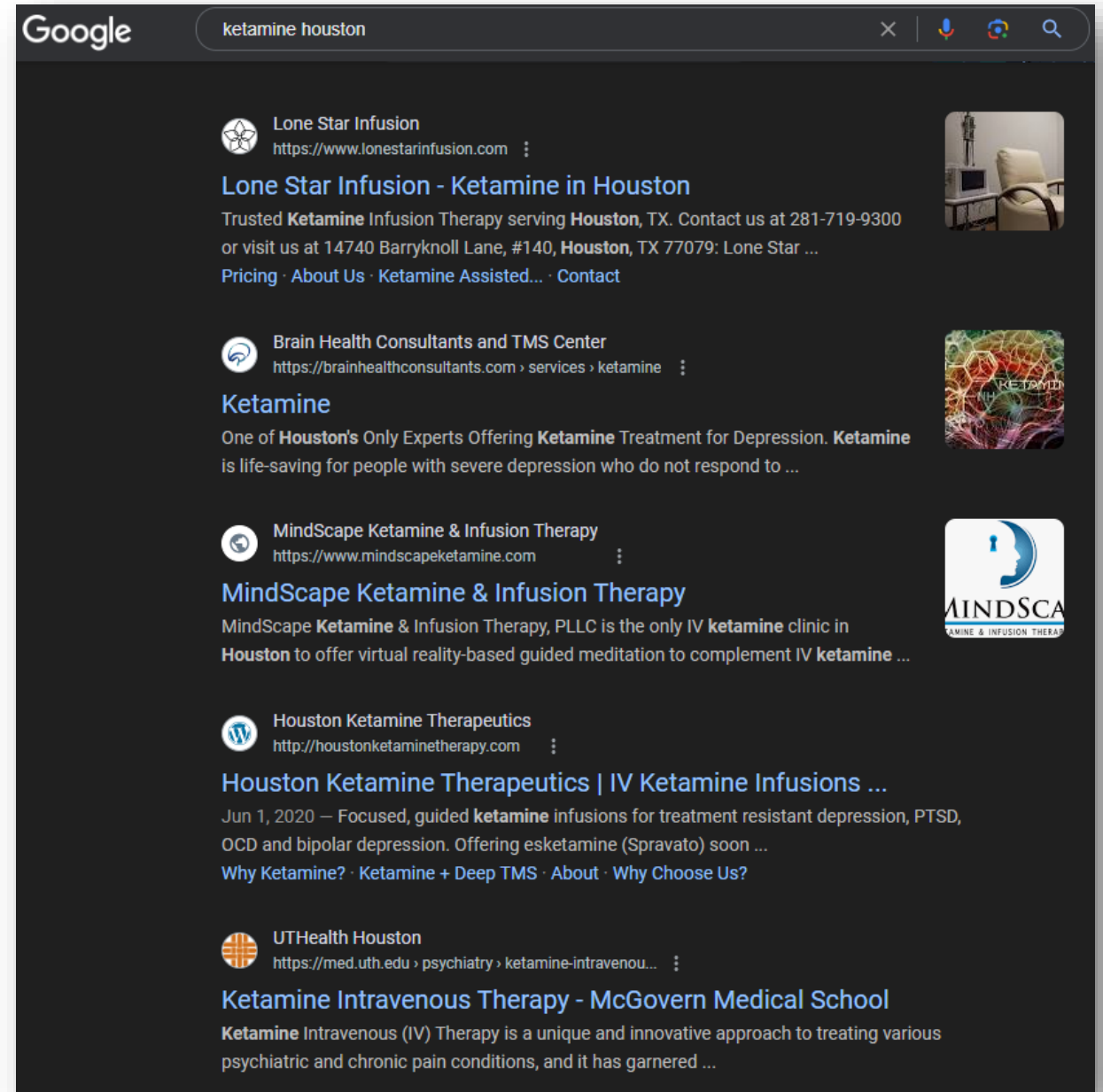
To further clarify the role of PCP receptors, we tested two other PCP receptor ligands, tiletamine and ketamine. Both agents are anesthetics used in veterinary medicine, and ketamine is used in human anesthesia (15). Each drug was administered in aqueous solution (12) as a single dose (1, 5, 10, and 20 mg/kg sc for tiletamine and 5, 10, 20, and 40 mg/kg sc for ketamine) to adult rats ($n = 6$ per treatment group). Examination of the brains 4 hours later revealed vacuole formation in cingulate and retrosplenial cerebrocortical neurons after tiletamine treatment at 10 and 20 mg/kg and ketamine treatment only at 40 mg/kg. Lower doses of either drug were not associated with cerebrocortical pathological changes.

- Only 40 mg/kg SC ketamine showed cerebrocortical pathological changes
- ~3,000 mg dose for 75 kg human patient

Stakeholder Confusion

Questions from FDA Compounding Risk Alerts

- Is the issue “compounded ketamine”?
- Or ketamine in general?



Google search results for "ketamine houston".

Lone Star Infusion
https://www.lonestarinfusion.com
Lone Star Infusion - Ketamine in Houston
Trusted Ketamine Infusion Therapy serving Houston, TX. Contact us at 281-719-9300 or visit us at 14740 Barryknoll Lane, #140, Houston, TX 77079: Lone Star ...
Pricing · About Us · Ketamine Assisted... · Contact

Brain Health Consultants and TMS Center
https://brainhealthconsultants.com › services › ketamine
Ketamine
One of Houston's Only Experts Offering Ketamine Treatment for Depression. Ketamine is life-saving for people with severe depression who do not respond to ...

MindScape Ketamine & Infusion Therapy
https://www.mindscapeketamine.com
MindScape Ketamine & Infusion Therapy
MindScape Ketamine & Infusion Therapy, PLLC is the only IV ketamine clinic in Houston to offer virtual reality-based guided meditation to complement IV ketamine ...

Houston Ketamine Therapeutics
http://houstonketaminetherapy.com
Houston Ketamine Therapeutics | IV Ketamine Infusions ...
Jun 1, 2020 — Focused, guided ketamine infusions for treatment resistant depression, PTSD, OCD and bipolar depression. Offering esketamine (Spravato) soon ...
Why Ketamine? · Ketamine + Deep TMS · About · Why Choose Us?

UTHealth Houston
https://med.uth.edu › psychiatry › ketamine-intravenou...
Ketamine Intravenous Therapy - McGovern Medical School
Ketamine Intravenous (IV) Therapy is a unique and innovative approach to treating various psychiatric and chronic pain conditions, and it has garnered ...

30-year History Compounding with Ketamine

Journal of Affective Disorders 314 (2022) 59–67



Contents lists available at ScienceDirect
Journal of Affective Disorders
journal homepage: www.elsevier.com/locate/jad

Research paper

At-home, sublingual ketamine telehealth is a safe and effective treatment for moderate to severe anxiety and depression: Findings from a prospective, open-label effectiveness trial

Thomas D. Hull^{a,*,1}, Matteo Malgaroli^{b,1}, Adam Gazzaley^c, Teddy J. Akiki^d, Leonardo Vando^e, Kristin Arden^f, Jack Swain^f, Madeline Klotz^f, Casey Paley^f

^a Institute for Psycholinguistics and Digital Health, United States of America

^b Department of Psychiatry, NYU Grossman School of Medicine, United States of America

^c University of California, San Francisco, United States of America

^d Center for Behavioral Health, Neurological Institute, Cleveland Clinic, United States of America

^e Houston Methodist Behavioral Health, United States of America

^f Mindbloom, United States of America

ABSTRACT

Background: At-home Ketamine-assisted therapy (KAT) with psychosocial support and remote monitoring through telehealth platforms addresses access barriers, including the COVID-19 pandemic. Large-scale evaluation of this approach is needed for questions regarding safety and effectiveness for depression and anxiety.

Methods: In this prospective study, a large outpatient sample received KAT over four weeks through a telehealth provider. Symptoms were assessed using the Patient Health Questionnaire (PHQ-9) for depression, and the Generalized Anxiety Disorder scale (GAD-7) for anxiety. Demographics, adverse events, and patient-reported dissociation were also analyzed. Symptom trajectories were identified using Growth Mixture Modeling, along with outcome predictors.

Results: A sample of 1247 completed treatment with sufficient data, 62.8 % reported a 50 % or greater improvement on the PHQ-9, $d = 1.61$, and 62.9 % on the GAD-7, $d = 1.56$. Remission rates were 32.6 % for PHQ-9 and 31.3 % for GAD-7, with 0.9 % deteriorating on the PHQ-9, and 0.6 % on the GAD-7. Four patients left treatment early due to side effects or clinician disqualification, and two more due to adverse events. Three patient subpopulations emerged, characterized by Improvement (79.3 %), Chronic (11.4 %), and Delayed Improvement (9.3 %) for PHQ-9 and GAD-7. Endorsing side effects at Session 2 was associated with delayed symptom improvement, and Chronic patients were more likely than the other two groups to report dissociation at Session 4.

Conclusion: At-home KAT response and remission rates indicated rapid and significant antidepressant and anxiolytic effects. Rates were consistent with laboratory- and clinic-administered ketamine treatment. Patient screening and remote monitoring maintained low levels of adverse events. Future research should assess durability of effects.

Alliance for Pharmacy Compounding

Best Practices for Preparing and Dispensing Compounded Ketamine by Pharmacies

April 1, 2024

This document is not specific to particular indications or dosage forms for compounded ketamine, and it is not intended to be an exhaustive statement on the practice of compounding ketamine. It should not be relied upon as advice. Pharmacies should seek legal counsel before compounding ketamine.

These best practices apply to the following circumstances in which manufactured ketamine is prescribed or administered off label and when compounded ketamine is being prescribed and/or administered off-label for certain indications:

1. Commercially available intravenous/intramuscular or compounded IV/IM ketamine administered in-clinic to a specific patient for the treatment of a specific, legitimate medical indication. (The patient is monitored for potential adverse effects by a practitioner during the treatment.)
2. Compounded ketamine nasal sprays, rapid dissolve tablets, troches, suppositories, or other dosage forms prescribed and dispensed to a specific patient for the treatment of a specific, legitimate medical indication.

Best Practices for Preparing and Dispensing Compounded Ketamine by Pharmacies

- **Pharmacist Legal Obligations**

- DEA & controlled substance laws, federal & state-specific
- Pharmacist's corresponding responsibility

- **Diversion Concerns**

- Prescription Drug Monitoring Program (PDMP) utilization for every filling of each Rx
- Thorough patient & prescriber verification to ensure legitimacy and appropriateness of Rx
 - Verify patient-prescriber relationship
 - Consider prescriber scope of practice
- Caution with high volumes, multiple refills, early-refill requests. Watch for patterns
- Monitor pharmacy inventory
- Prompt and thorough investigations for any concerns. Report to appropriate authorities

Best Practices for Preparing and Dispensing Compounded Ketamine by Pharmacies

- **Dosing Limits**

- Evaluate each Rx carefully, considering best practices and RPh corresponding responsibility.
- Establish appropriate dosing considerations for ketamine based on clinical guidelines, available evidence, and knowledge of patient's specific needs.
- Use professional judgement, clinical literature, and communication with the prescriber when assessing dosing for each condition, considering individual patient factors and treatment goals. Do not utilize arbitrary limits.

- **Dosage Forms**

- Consider utilizing alternative dosage forms, such as capsules containing abuse-deterrent excipients, to enhance safety
- **Consider dispensing all ketamine products in a child-resistant container**, even if the resident state does not require it

Best Practices for Preparing and Dispensing Compounded Ketamine by Pharmacies

- **Documentation**

- Properly document all aspects of compounding & dispensing process, particularly for outlying events involving dosing, directions for use, and other concerns
- Document drug-drug interactions, early-refill conversations with providers, and anything that may constate a “red flag”, along with all other DUR documentation

- **Patient Education**

- Provide comprehensive counseling to patients, which may include written and verbal communication
- Supply written educational materials to reinforce key points and serve as a reference for patients
- Education patients on side effects, emphasizing restrictions on driving or combining with other medications or alcohol

Best Practices for Preparing and Dispensing Compounded Ketamine by Pharmacies

- Constructive Transfer
 - DEA considerations
- Ketamine Onboarding Checklist for 503B Wholesaling
 - (Outside the scope of traditional pharmacy practice)

Other Common Discussions

- Ketamine is not esketamine
 - Patient access to the right therapy, with oversight from treating physicians, is vital
- Operational Protocols
 - Pharmacies have SOP's for the compounding laboratory
 - Physicians have treatment protocols for patients
 - Some physicians have patients and pharmacy review & sign treatment protocols, and each entity gets a copy
 - Risks, benefits, FAQs

THANK YOU FOR THE
OPPORTUNITY TO SPEAK AT
THIS EVENT TODAY

Policy and Regulatory Challenges for the Medical Use of Ketamine

Discussion:

- **Gail Bormel, RPh, JD**, U.S. Food and Drug Administration
- **A.J. Day, PharmD, RPh**, National Community Pharmacists Association
- **Lisa Harding, MD**, Yale University
- **Seth Mailhot, JD**, Husch Blackwell
- **Lisa Robin**, Federation of State Medical Boards
- **Jenni Wai, RPh, MBA**, Ohio Board of Pharmacy

Online Promotion and Access to Ketamine



Michael DiStefano, PhD, MBE
University of Colorado - Anschutz



JOHNS HOPKINS
M E D I C I N E

Ketamine: False and Misleading Advertising


A Survey of Maryland Ketamine Clinics


Matthew A. Crane, Michael J. DiStefano, Thomas J. Moore

Disclaimer

This presentation and associated documents reflect the views of the authors and should not be construed to represent the views or policies of the US Food and Drug Administration, the Department of Health and Human Services, or the US Government.

US Patients US Healthcare Providers REMS Important Safety Information Full Prescribing Information Información en Español Medication Guide


Spravato®
(esketamine) 
28 mg nasal spray

Why SPRAVATO® Getting Started on SPRAVATO® Cost Support & Education 




SPRAVATO®, the only FDA-approved nasal spray for adult patients with two forms of challenging-to-treat major depressive disorder (MDD):

- Adults with MDD who've had an inadequate response to two or more oral antidepressants, known as treatment-resistant depression (TRD)
- Depressive symptoms in adults with MDD with suicidal thoughts or actions (MDSI)

See Limitations of Use below



Actor portrayal.

IMPORTANT SAFETY INFORMATION

What is the most important information I should know about SPRAVATO®?

SPRAVATO® can cause serious side effects, including:

- **Sedation and dissociation.** SPRAVATO® may cause sleepiness (sedation), fainting, dizziness, spinning sensation, anxiety, or feeling disconnected from yourself, your thoughts, feelings, space and time (dissociation).
 - Tell your healthcare provider right away if you feel like you cannot stay awake or if you feel like you are going to pass out.
 - Your healthcare provider must monitor you for serious side effects for at least 2 hours after taking SPRAVATO®. Your healthcare provider will decide when you are ready to leave the healthcare setting.
- **Abuse and misuse.** There is a risk for abuse and physical and psychological dependence with SPRAVATO® treatment. Your healthcare provider should check you for signs of abuse and dependence before and

Indications and Limitations of Use:

SPRAVATO® is a prescription medicine, used along with an antidepressant, taken by mouth to treat:

- Adults with treatment-resistant depression (TRD)
- Depressive symptoms in adults with major depressive disorder (MDD) with suicidal thoughts or actions

Limitations of Use:

SPRAVATO® is not for use as a medicine to prevent or relieve pain (anesthetic). It is not known if SPRAVATO® is safe or effective as an anesthetic medicine.

It is not known if SPRAVATO® is safe and effective for use in preventing suicide or in reducing suicidal thoughts or actions. SPRAVATO® is not for use in place of hospitalization if your healthcare provider

Source: <https://www.spravato.com/>

MEDICATION GUIDE
SPRAVATO® (sprah vah' toe) CIII
(esketamine)
nasal spray

What is the most important information I should know about SPRAVATO?

SPRAVATO can cause serious side effects, including:

- **Sedation and dissociation.** SPRAVATO may cause sleepiness (sedation), fainting, dizziness, spinning sensation, anxiety, or feeling disconnected from yourself, your thoughts, feelings, space and time (dissociation).
 - Tell your healthcare provider right away if you feel like you cannot stay awake or if you feel like you are going to pass out.
 - Your healthcare provider must monitor you for serious side effects for at least 2 hours after taking SPRAVATO. Your healthcare provider will decide when you are ready to leave the healthcare setting.
- **Abuse and misuse.** There is a risk for abuse and physical and psychological dependence with SPRAVATO treatment. Your healthcare provider should check you for signs of abuse and dependence before and during treatment with SPRAVATO.
 - Tell your healthcare provider if you have ever abused or been dependent on alcohol, prescription medicines, or street drugs.
 - Your healthcare provider can tell you more about the differences between physical and psychological dependence and drug addiction.
- **SPRAVATO Risk Evaluation and Mitigation Strategy (REMS).** Because of the risks for sedation, dissociation, and abuse and misuse, SPRAVATO is only available through a restricted program called the SPRAVATO Risk Evaluation and Mitigation Strategy (REMS) Program. SPRAVATO can only be administered at healthcare settings certified in the SPRAVATO REMS Program. Patients treated in outpatient healthcare settings (e.g. medical offices and clinics) must be enrolled in the program.
- **Increased risk of suicidal thoughts and actions.** Antidepressant medicines may increase suicidal thoughts and actions in some people 24 years of age and younger, **especially within the first few months of treatment or when the dose is changed. SPRAVATO is not for use in children.**
 - Depression and other serious mental illnesses are the most important causes of suicidal thoughts and actions. Some people may have a higher risk of having suicidal thoughts and actions. These include people who have (or have a family history of) depression or a history of suicidal thoughts and actions.

How can I watch for and try to prevent suicidal thoughts and actions in myself or a family member?

- Pay close attention to any changes, especially sudden changes, in mood, behavior, thoughts, or feelings, or if you develop suicidal thoughts or actions.
- Tell your healthcare provider right away if you have any new or sudden changes in mood, behavior, thoughts, or feelings.
- Keep all follow-up visits with your healthcare provider as scheduled. Call your healthcare provider between visits as needed, especially if you have concerns about symptoms.

Tell your healthcare provider right away if you or your family member have any of the following symptoms, especially if they are new, worse, or worry you:

- suicide attempts
- thoughts about suicide or dying
- worsening depression
- other unusual changes in behavior or mood

Maryland Ketamine Clinics

Table 1. Services Offered by 17 Maryland Ketamine Advertisers and Associated Cost

Services listed	No. of clinics advertising service ^a	Cost disclosed, \$ ^b	Cost range, \$ ^b
Infusion ^c	13	7	360-2500
Ketamine-assisted psychotherapy ^d	9	2	150-500
Consultation ^e	9	9	0-390
Esketamine ^f	6	2	250-300
Intramuscular injection	2	1	450
Oral ^g	2	1	89
Intranasal ^h	1	1	300

^a Not all advertisers provided a specific inventory of services offered.

^b Not all advertisers provided cost for the services offered. The range provided represents data from clinics that did provide these data.

^c Cost per infusion varied by different dimensions. Some advertisers offered a first-visit discount. Others charged different costs by different indications (eg, a mood disorder would be priced differently compared with a chronic pain disorder).

^d Ketamine-assisted psychotherapy (also known as KAP or ketamine assisted-therapy [KAT]) refers to the use of ketamine as an adjunct to psychotherapy sessions.

^e Consultations were free at times and at other times a fee was charged to determine whether ketamine therapy would be appropriate.

Our success rate with all therapies including Ketamine, concussion, and Lyme disease is above 90%. For patients with dementia and cognitive issues, we anticipate stabilization while looking for root causes, and in cases of mild cognitive impairment, we anticipate reversal and improved functioning.

Today, **Ketamine** is being prescribed for more than just depression. **Ketamine** is now being used to treat alcohol abuse, drug addiction, sleeping disorders, pain both acute and chronic as well as anxiety even Asthma.

During a Ketamine treatment, you generally will not feel any side effects during or after, and appointments usually take less than an hour. You can feel secure and comfortable during your visit.

Addiction and Risk

How does ketamine treat anxiety?

██████████ Ketamine and Wellness uses ketamine, a nonaddictive medication, to treat anxiety. Ketamine interacts with brain receptors capable of regulating your behavioral responses, so it works well to treat symptoms of depression, post-traumatic stress disorder (PTSD), and other mood disorders.

Is there potential for addiction? ^

Some may have heard that ketamine is used as a “party drug” and worry about addiction potential. Studies and clinical experience have shown that in very low doses, like those used in this treatment, in a medical setting with lack of access at home, and infrequent dosing, there is virtually no potential for addiction or abuse.

Addiction and Risk

Other risks

Misuse (drug abuse) of ketamine has been reported in the past. Reports have indicated that ketamine can cause various symptoms, including but not limited to flashbacks, hallucinations, feelings of unhappiness, restlessness, anxiety, insomnia, or disorientation. Individuals with a history of drug misuse or dependence can develop a dependency on ketamine.

As Ketamine is used for sedation in surgery, the doses used in this study may cause sleepiness and may put you to sleep. There is a potential risk of dosing error or unknown drug interaction that may cause significant sedation and may require medical intervention including intubation (putting in a breathing tube).

Addiction and Risk

- 5 sites minimized risk of abuse
- 3 sites claimed ketamine is non-addictive
- 7 sites did not disclose risks of adverse effects or risk of addiction or misuse



Regulatory Language



Ketamine Treatment

Depression can be a severe, recurring, disabling, and life-threatening condition. When current medical treatments are only partially effective, ketamine may be used to provide rapid-acting antidepressant effect. Ketamine is approved by the Food and Drug Administration (FDA) to treat depressions.

[Learn More](#)

Nasal spray Esketamine (SPRAVATO®) is an FDA-approved medication for treatment resistant depressive disorders. Other forms of Ketamine such as injectables (IV Infusion, Under the muscle) can reduce severe depressive symptoms including suicidal thoughts within a few hours to some days. Repeated Ketamine treatment overtime have shown effectiveness towards reversing the course of depression, anxiety, PTSD and OCD symptoms.

What is Ketamine?

Ketamine is a well-researched, dissociative anesthetic that was approved by the FDA in 1970. Since then, ketamine has been used extensively for pediatric and adult treatment in surgery, emergency departments, ambulances, trauma medicine, and war zones. It is a commonly used medication in veterinary medicine. The World Health Organization lists ketamine as one of the most essential medications due to its therapeutic effects and wide margin of safety.

Over the last decade, Yale University and the National Institutes of Health identified additional benefits of ketamine in the treatment of mood disorders and chronic pain. The use of ketamine for depression has been named “the biggest discovery in mental health in decades.”

Regulatory Language

- 1 site stated the FDA had approved ketamine as a treatment for depression
- 10 sites did not disclose that ketamine use for mental health conditions is off-label and not FDA-approved for these indications
- All 3 sites offering unapproved oral or intranasal forms of ketamine did not disclose this unapproved status



Takeaways

- Maryland consumers and patients are not consistently provided important facts relevant to their decision to pursue ketamine treatment.
- Information provided at times ranges from false to misleading or deceptive.
- At least 800 ketamine clinics nationwide

Thank you

Research Letter | Health Policy



November 7, 2023

False or Misleading Claims in Online Direct-to-Consumer Ketamine Advertising in Maryland

Matthew A. Crane, BS¹; Michael J. DiStefano, PhD²; Thomas J. Moore, AB³

Crane MA, DiStefano MJ, Moore TJ. False or Misleading Claims in Online Direct-to-Consumer Ketamine Advertising in Maryland. *JAMA Netw Open*. 2023;6(11):e2342210. doi:10.1001/jamanetworkopen.2023.42210

Online Promotion and Access to Ketamine



Boris Heifets, MD,
Stanford University School of Medicine

Setting expectations about ketamine therapy for mental health indications

Boris D. Heifets, MD, PhD



@theBorisLab



Associate Professor
Department of Anesthesiology, Perioperative
and Pain Medicine
(by courtesy) Department of Psychiatry and
Behavioral Sciences
Stanford University School of Medicine



Heifetslab

<https://heifetslab.stanford.edu>

Boris Heifets, MD, PhD

Associate Professor

Department of Anesthesiology, Perioperative & Pain Medicine,

And by courtesy, Psychiatry & Behavioral Sciences

Stanford University School of Medicine, Stanford, CA, USA

Grant Support:

RO1MH130591 (PI)

“Mapping neural circuit activity mediating MDMA's prosocial effects”

P50DA042012 (multi-PI)

Overall PI: Karl Deisseroth MD, PhD

“Neural circuit dynamics of drug action: revealing, uncoupling, and restoring altered brain states”

R01MH133553 (co-I)

PI: Carolyn Rodriguez MD, PhD

“Examining Mu Opioid Mechanisms of Ketamine's Rapid Effects In OCD”

Foundation for OCD Research (co-I)

PI: Carolyn Rodriguez MD, PhD

“Pilot study of 3,4-methylenedioxymethamphetamine (MDMA) in OCD”

American Foundation for Suicide Prevention (co-I)

PI: Alan Schatzberg MD

“Opiate Suicide Study in Patient with Major Depression”

Financial relationships :

I own stock in:

- **Osmind Mental Health** (Scientific Advisor)
- **Journey Clinical** (Scientific Advisor)

I consult for (past 24 months):

- **Clairvoyant Therapeutics, Inc.**
- **Arcadia Medicine, Inc.**

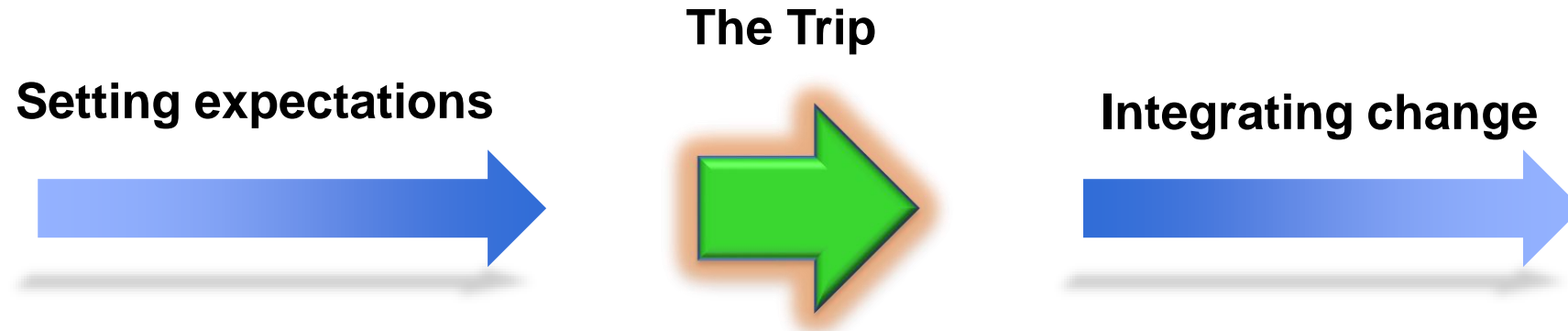
My presentation includes discussion of off-label or investigational use of ketamine. All references are to peer-reviewed clinical and preclinical research unless otherwise noted.

Key points

1. Patient **expectations** shape ketamine's measured efficacy
2. **What kind of information** do patients get about safety and efficacy?
3. 'Real World Evidence': **hard to collect data** on safety

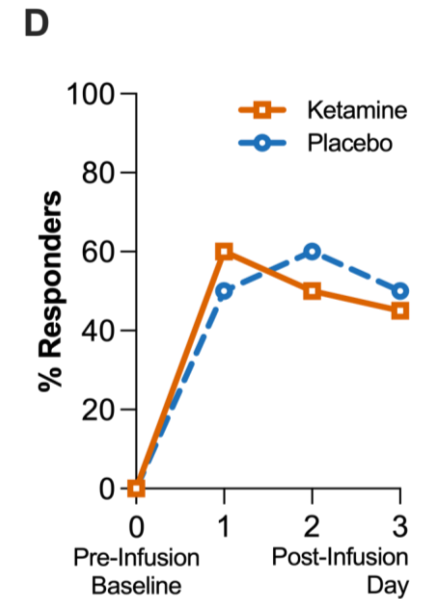
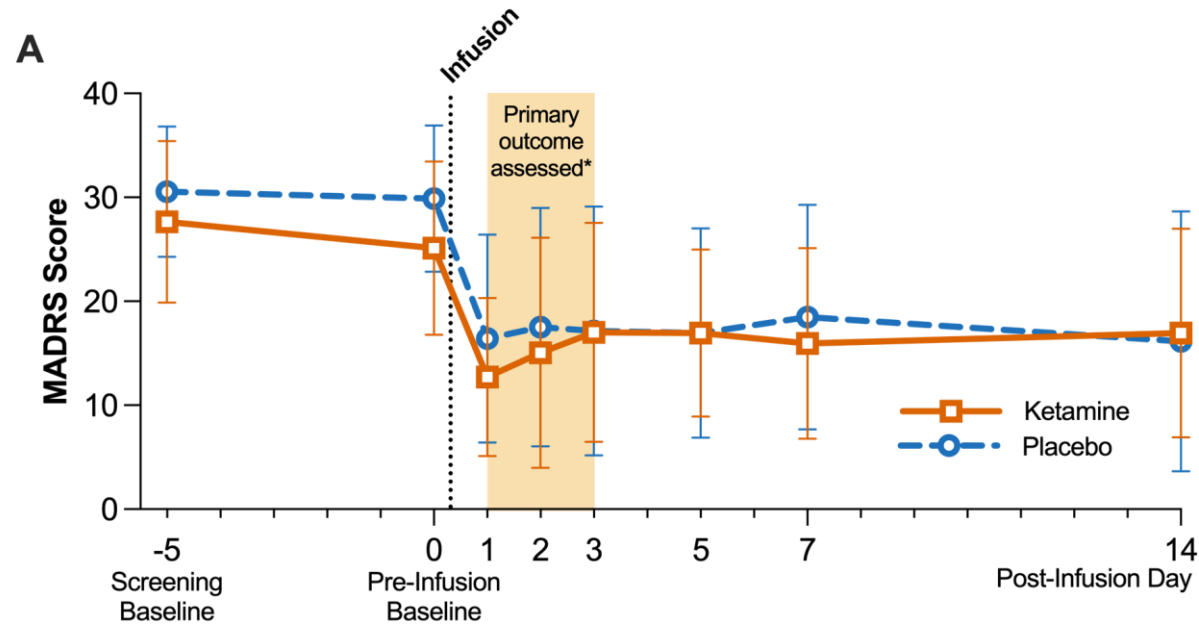
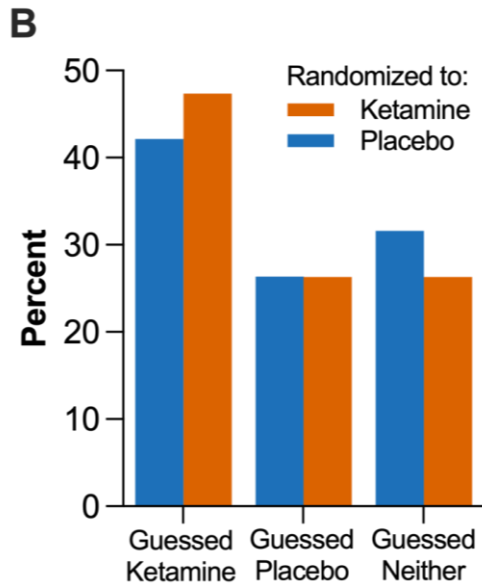
Potent therapy, by definition, carries risk

**Is it the drug, the trip,
...or non-drug factors?**



**Does ketamine work for depression in
unconscious patients?**

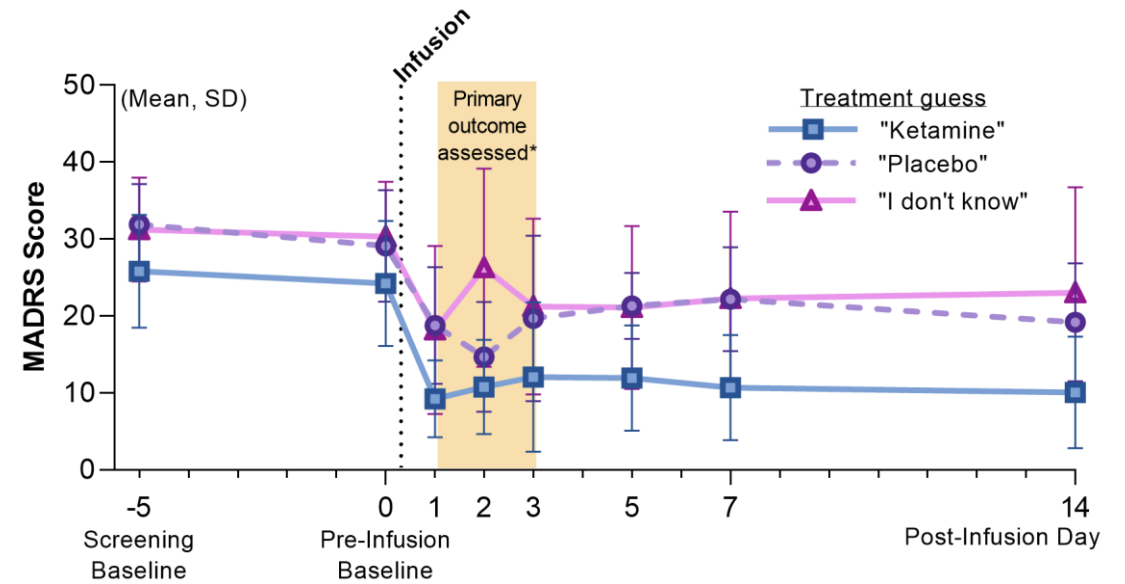
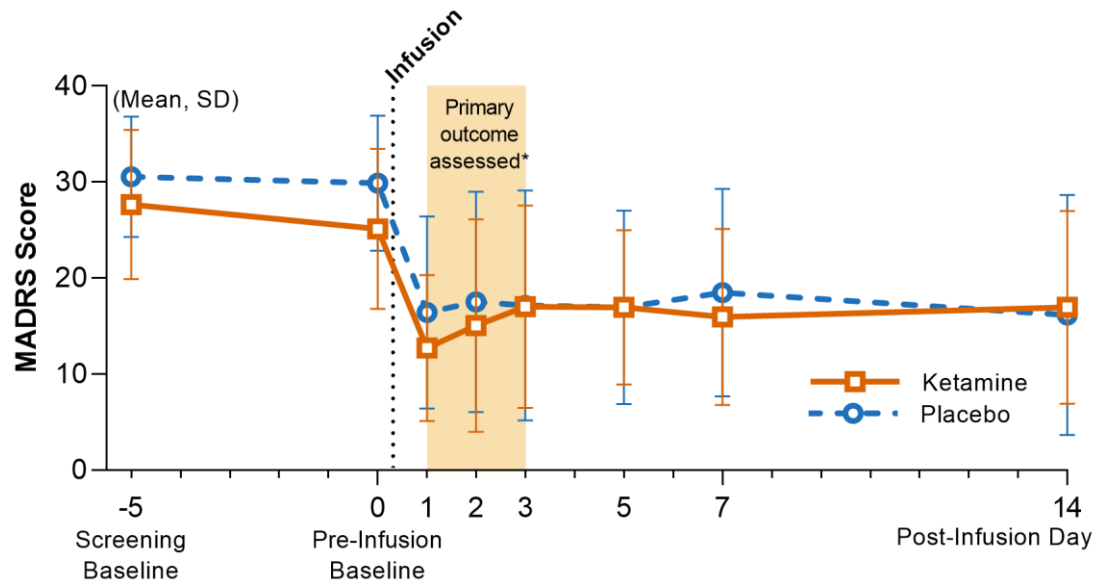
Ketamine vs Placebo during surgical anesthesia in Patients with Major Depressive Disorder



When the blind is maintained,
expectation + a big “event”
may have a
dramatic treatment effect

Expectations and outcomes

**Patients who experienced improvements in mood thought they received ketamine...
but on average did not improve more than placebo.**



Key points

1. Patient **expectations** shape ketamine's measured efficacy
2. **What kind of information** do patients get about safety and efficacy?
3. 'Real World Evidence': **hard to collect data** on safety



MENTAL

Getting the In Ketamine's Myst

Achieve Your Bre With Psychedelic

Reduce your anxiety or depression a
clinician-prescribed, guided experie

- 87% of clients report improvement in depr
- 85% of clients report improvement in anxi

AM I A CANDIDATE?

AS SEEN IN:

The New York Times

I

Introducing Wonder Calm

The future of anxiety treatment

This low-dose, oral ketamine treatment
combats anxiety from the comfort of your
home.

Get Started

Your personalized treatment program gives you the power
to heal your mind, enabling sustainable life change and a
return to a life of productivity and joy.

Wonder Calm is available exclusively through Wondermed.



Psychedelic Media Exposure Questionnaire (PMEQ)

Study 1 Stanford Pain Clinic Registry (N=6,891 contacted)

- N = 472 Completed Survey
- N = 197 (41.7%) identified ketamine as a psychedelic

Study 2: Reddit / X sample

- N = 159 Completed Survey
- N = 76 (47.8%) identified ketamine as a psychedelic

Audrey Evers (Stanford)
Chris Kelly, PhD (Icahn / Mt Sinai)
Shayla Love (Science Journalist)
Et al.

Manuscript in preparation

Psychedelic Media Exposure Questionnaire (PMEQ): items sourced from news and advertisements

- Psychedelic therapy is like 10 years of therapy in 1-day
- Psychedelic therapy is far better than antidepressant medication
- Psychedelics are a cure for mental illness
- Psychedelics shut down the default mode network in the brain
- Psychedelics rewire your brain
- Psychedelics are among the safest drugs
- Psychedelics open another plane of spiritual existence
- Psychedelics have the potential to help people

- Psychedelics can make you psychotic or manic
- Psychedelics are dangerous
- Governments have used psychedelics for mind control

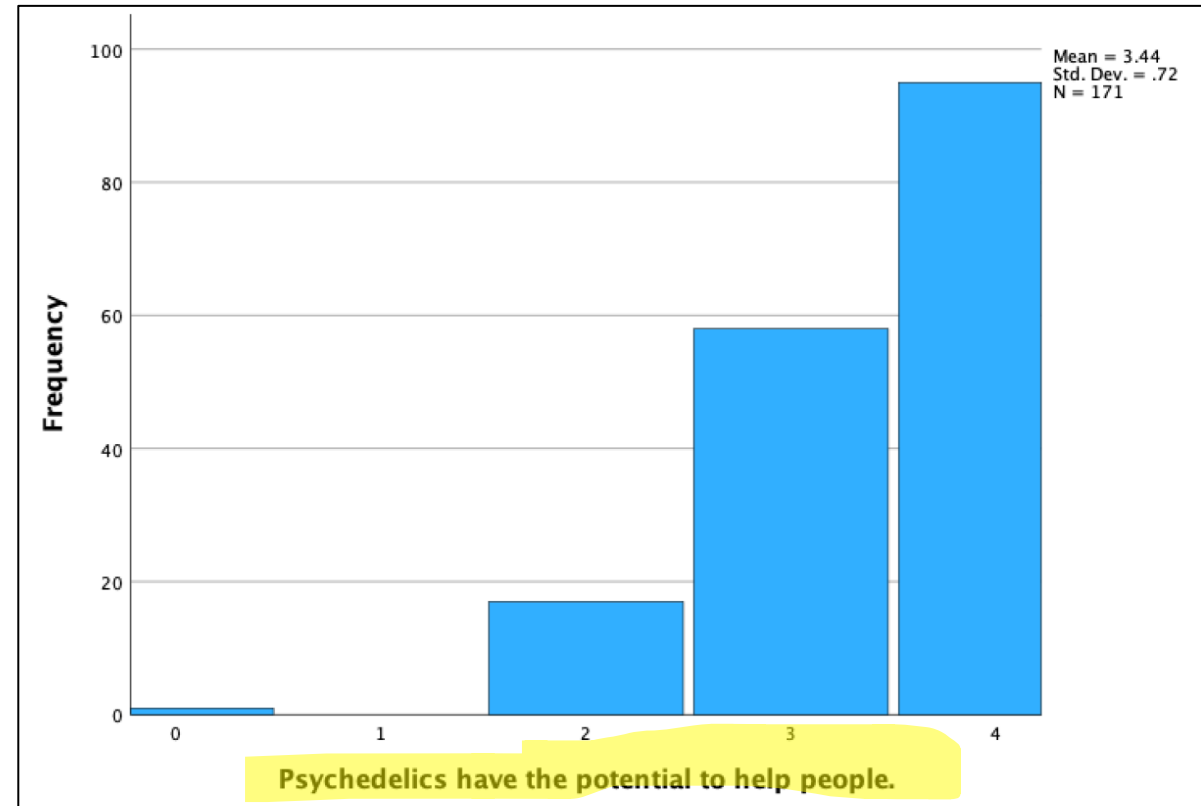
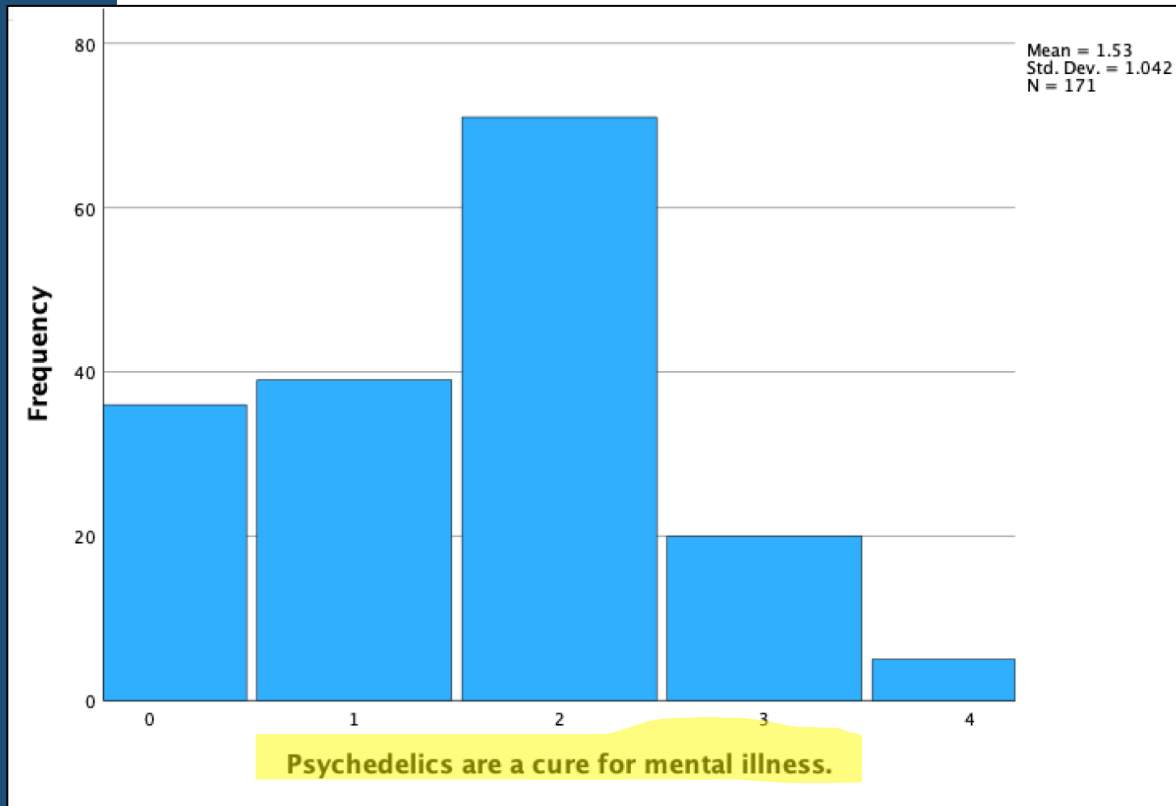
- 0, Strongly Disagree
- 1, Disagree
- 2, Neither Agree Nor Disagree
- 3, Agree
- 4, Strongly Agree

On average, general views fall in the moderate (neither agree nor disagree). More extreme statements (Psychedelics are a cure for mental illness) had lower agreement.

Audrey Evers (Stanford)
Chris Kelly, PhD (Icahn / Mt Sinai)
Shayla Love (Science Journalist)
Et al.

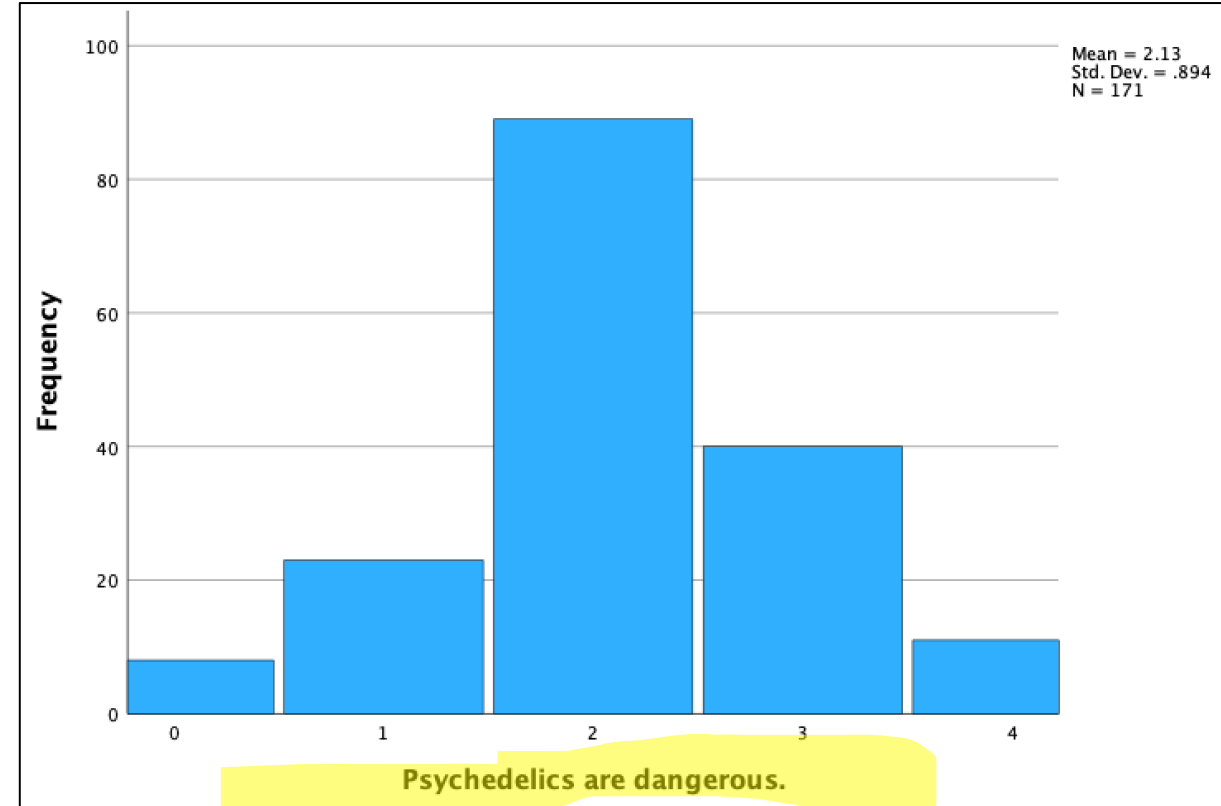
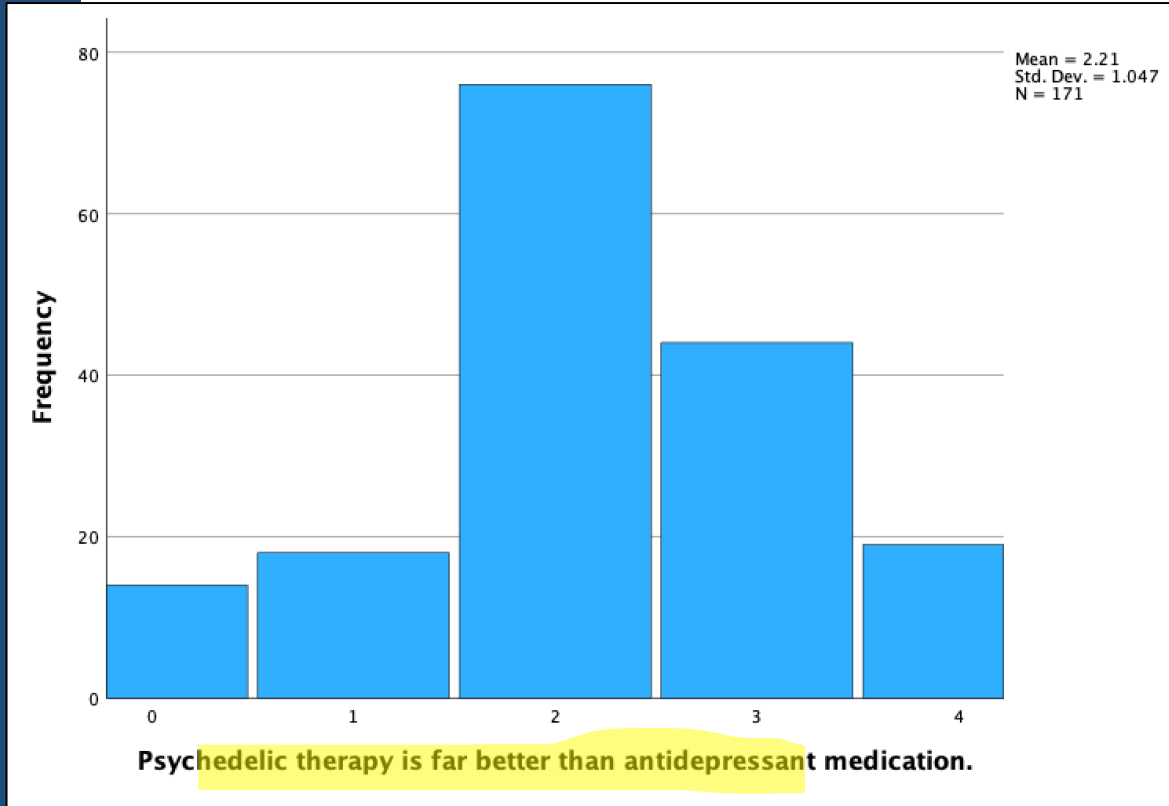
Manuscript in preparation

Psychedelic Media Exposure Questionnaire (PMEQ)



Audrey Evers (Stanford)
Chris Kelly, PhD (Icahn / Mt Sinai)
Shayla Love (Science Journalist)
Et al.
Manuscript in preparation

Psychedelic Media Exposure Questionnaire (PMEQ)



Audrey Evers (Stanford)
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Shayla Love (Science Journalist)
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Manuscript in preparation

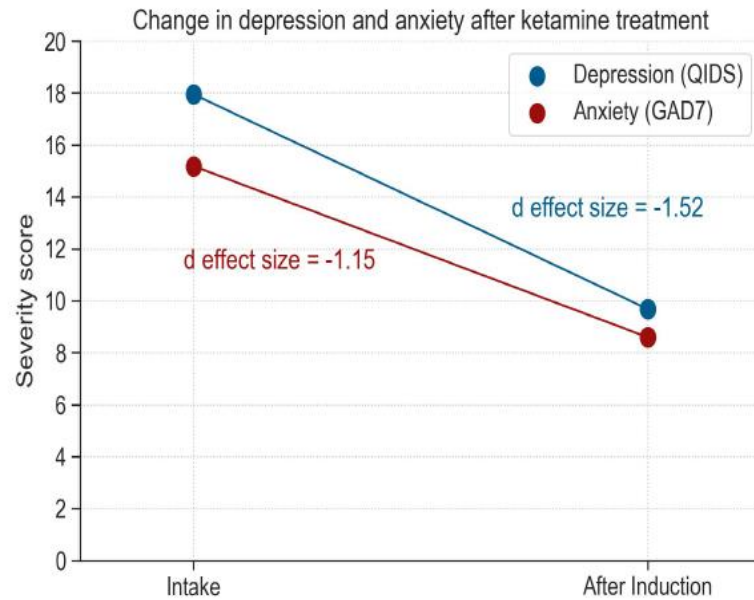
Key points

1. Patient **expectations** shape ketamine's measured efficacy
2. **What kind of information** do patients get about safety and efficacy?
3. 'Real World Evidence': **hard to collect data on safety**

Ketamine: real world evidence of efficacy

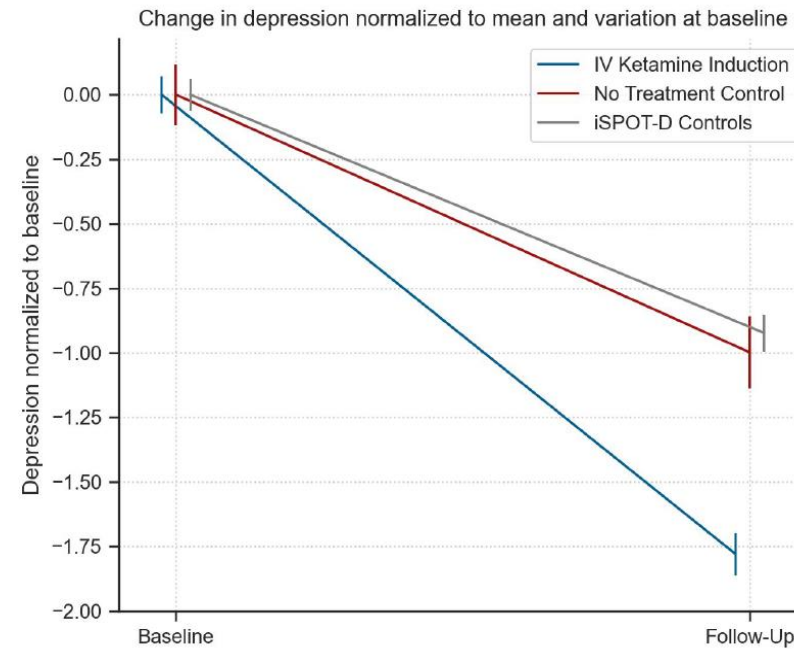
Ketamine improves depression and anxiety symptoms

N= 714



Comparison with two control datasets

N= 276 and N=1,008



In collaboration with



Tuuli Hietamies

Alison McIness

Jimmy Qian

Matt Worley

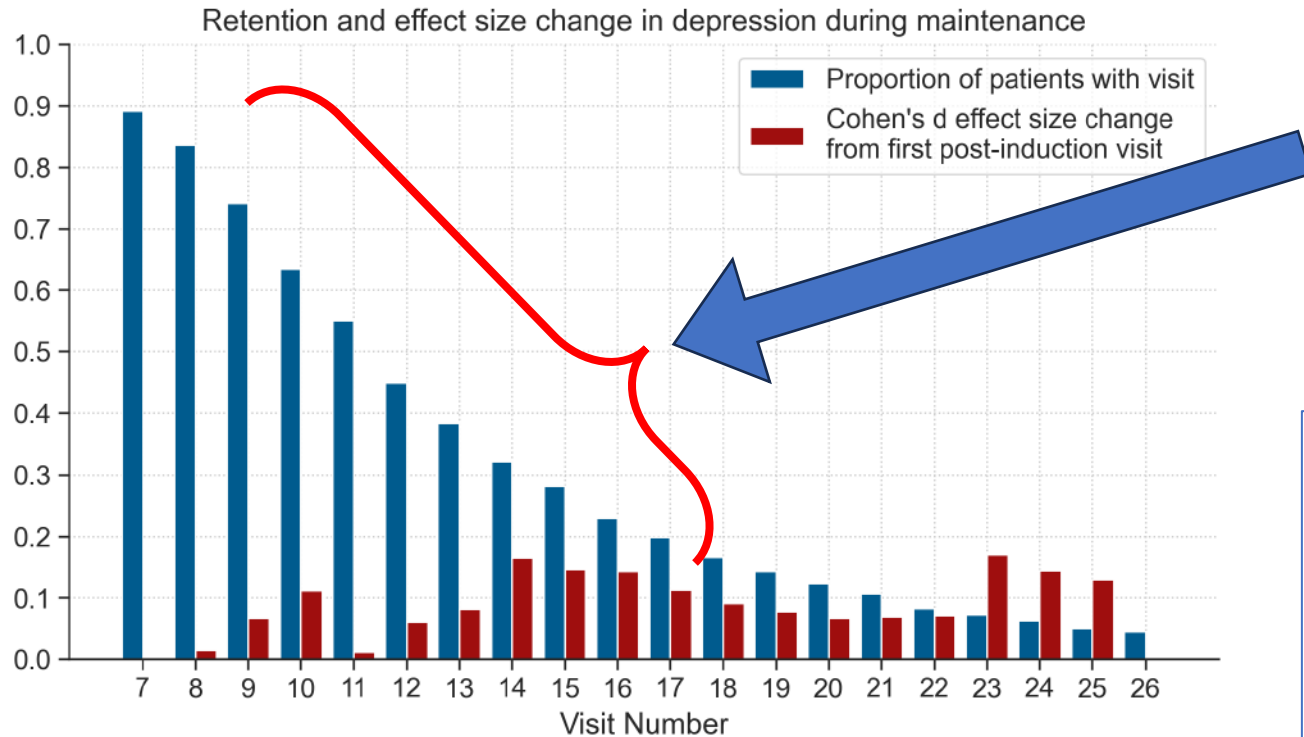
Andy Klise

Leanne Williams

Steven Levine

Hietamies et al, 2023 *J Affective Disorders*

Ketamine: real world evidence of **safety**?



What happened to the patients who left care?

Without a clinician in the loop, are safety claims reliable?

Safety concerns for ketamine

- Diversion
- Misuse / abuse
- Medical complications of long-term use

In collaboration with

osmind

Tuuli Hietamies

Alison McIness

Jimmy Qian

Matt Worley

Andy Klise

Leanne Williams

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Hietamies et al, 2023 *J Affective Disorders*

Can we learn about ketamine risk from others' experience?

We have a way; where's the will to tackle drugs?



Philip Yeung

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Published: 12:00am, 9 Apr, 2010

Why you can trust SCMP

Hong Kong is fast becoming a K-society, K as in ketamine; it is everywhere you look. The fact that it is a soft drug doesn't make it any less dangerous. Ketamine has several properties that make it a drug of choice for the masses. This drug is not about exclusivity; social workers in the know say that four people can get high by sharing just HK\$20 worth of ketamine. Its cheapness explains its socially penetrative power. Schoolchildren can use their pocket money to get high without their parents being any the wiser. As a result, about 80 per cent of young drug addicts are taking ketamine. South China Morning Post, Apr 9, 2010

Commission on Narcotic Drugs

Fifty-eighth session

Vienna, 9-17 March 2015

Item 6 (b) of the provisional agenda*

Implementation of the international drug control treaties:

Changes in the scope of control of substances

Further information provided by the People's Republic of China on the proposed scheduling of ketamine

On 8 March 2014, pursuant to article 2, paragraph 1, of the Convention on Psychotropic Substances of 1971, the Government of China notified the Secretary-General of the United Nations that China recommended that ketamine should be placed in Schedule I of the 1971 Convention (see E/CN.7/2015/7, annex III).

Following its thirty-sixth meeting, the World Health Organization's Expert Committee on Drug Dependence has recommended that ketamine not be placed under international control at this time (see E/CN.7/2015/7, annex IV).

On 4 March 2015, the Government of the People's Republic of China referring to its note verbale dated 8 March 2014, informed the Secretary-General of the United Nations, that China wished to change the proposal for scheduling ketamine from under Schedule I to under Schedule IV of the 1971 Convention, based on further consideration guided by the principle of a comprehensive and balanced approach with regard to the needs, on one side, to prevent the ever-growing and wide abuse, diversion and illicit trafficking of ketamine, and on the other side, to ensure its availability for therapeutic use.

Key points

1. Patient **expectations** shape ketamine's measured efficacy
2. **What kind of information** do patients get about safety and efficacy?
3. 'Real World Evidence': **hard to collect data** on safety

Thank you! Questions?



@theBorisLab



Heifetslab

<https://heifetslab.stanford.edu>



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and Pain Medicine
(by courtesy) Department of Psychiatry and
Behavioral Sciences
Stanford University School of Medicine

Online Promotion and Access to Ketamine

Discussion:

- **Ilisa Bernstein, PharmD, JD**, Bernstein Rx Solutions
- **Michael DiStefano, PhD, MBE**, Colorado University Anschutz, Skaggs School of Pharmacy and Pharmaceutical Sciences
- **Boris Heifets, MD**, Stanford University School of Medicine
- **Richard Quaresima**, Federal Trade Commission

Break

The meeting will resume at 3:10 pm ET



Potential Future Use of Ketamine

Discussion:

- **Eric Hermes, MD**, Veterans Health Administration
- **Caroline Huang, PhD**, U.S. Food and Drug Administration
- **Michelle Kim Leff, MD, MBA**, Substance Abuse and Mental Health Services Administration
- **Lisa Robin**, Federation of State Medical Boards
- **Gerard Sanacora, MD, PhD**, Yale University

Understanding Current Use of Ketamine for Emerging Areas of Therapeutic Interest

Thank you for attending!

The meeting recording, transcript, and other materials will be available on the FDA Foundation website next week.

Funding Disclosure: This activity is one part of a multi-part Foundation project related to substance use disorder. The multi-part project is supported by the Food and Drug Administration (FDA) of the U.S. Department of Health and Human Services (HHS) as part of an overall award of \$1,720,109 of federal funds (100% of the project). The contents are those of the author(s) and do not necessarily represent the official views of, nor an endorsement, by FDA, HHS, or the U.S. Government. For more information, please visit [FDA.gov](https://www.fda.gov).



REAGAN-UDALL

A thick yellow swoosh graphic that starts on the left, curves upwards and then downwards to the right, framing the text below it.

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