Translational Science in Drug Development: Surrogate Endpoints, Biomarkers, and More

Duke-Margolis Center for Health Policy | Virtual Meeting May 24-25, 2022

Welcome and Overview | Day 2

Mark McClellan

Director, Duke-Margolis Center for Health Policy

Statement of Independence

The Robert J. Margolis, MD, Center for Health Policy is part of Duke University, and as such it honors the tradition of academic independence on the part of its faculty and scholars. Neither Duke nor the Margolis Center take partisan positions, but the individual members are free to speak their minds and express their opinions regarding important issues.

For more details on relevant institutional policies, please refer to the Duke <u>Faculty Handbook</u>, including the <u>Code of Conduct</u> and other <u>policies and procedures</u>. In addition, regarding positions on legislation and advocacy, Duke University policies are available at http://publicaffairs.duke.edu/government.

Disclaimer

Funding for this workshop was made possible in part by a cooperative agreement from the U.S. Food and Drug Administration. The views expressed in written workshop materials or publications and by speakers and moderators do not necessarily reflect the official policies of the Department of Health and Human Services nor does mention of trade names, commercial practices, or organizations imply endorsements by the U.S. Government.

Meeting Agenda (Day 2)

12:00 pm Welcome and Overview

12:10 pm Session 3: Clinical Validation and Regulatory Acceptance of Biomarkers as Surrogate

Endpoints

1:50 pm Break

2:05 pm Session 4: Beyond Surrogate Endpoints: Other Ways Translational Science Can Support Drug

Development

3:30 pm Session 5: Opportunities and Challenges for Incorporation of Translational Science in Clinical

Development Programs

4:15 pm Closing Remarks

4:25 pm Adjournment



Session 3: Clinical Validation and Regulatory Acceptance of Biomarkers as Surrogate Endpoints

12:10 pm - 1:50 pm EST

Steve Ryder

Chief Medical Officer Rallybio Inc.



Translational Science in Drug Development: Surrogate Endpoints, Biomarkers, and More May 24th and 25th 2022

Session 3: Clinical Validation and Regulatory Acceptance of Biomarkers as Surrogate Endpoints

Use of Imported Clinical Assessment Tools in Rare Disease: A Case Study

Steve Ryder Chief Medical Officer Rallybio

Contributors: David Thompson, Tino Melian, Kenji Fujita and Colleagues

5/22/2022

8

Disclosure

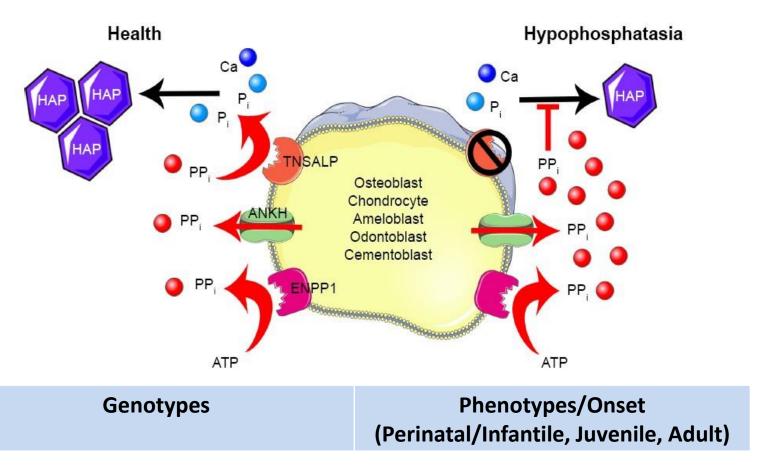
I am a full-time employee and hold an equity interest in Rallybio
At the time the presented work was done, I and all contributors were
full-time employees of and held equity interests in Alexion
Pharmaceuticals

Overview

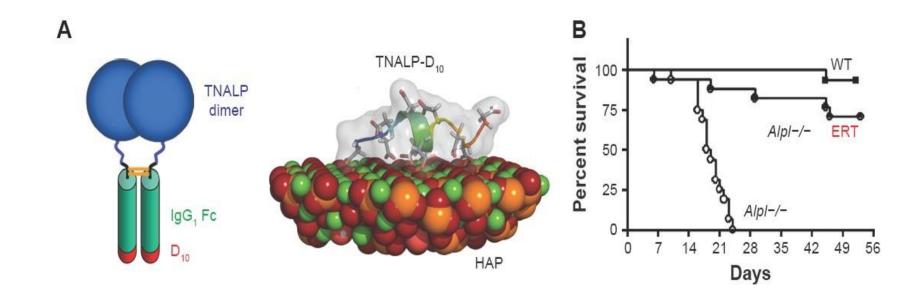
- Rare/ultra-rare diseases are generally poorly understood and poorly researched
- This extends to both the preclinical and clinical areas
- Almost always there is no precedent for designing studies in the treatment of rare/ultra-rare disease. Irreversible disease morbidity/mortality may constrain design and analytical approaches
- Assessment tools are often unavailable and almost never validated in the rare/ultra-rare disease under study
- One approach to improve the availability of assessment tools is to thoroughly review assessment tools in alternative disease areas with relevant morbidity/functional disability and pre-apply them to natural history cohorts
- This importation and logical application of assessment tools was successfully used in the development of asfotase alfa (Strensiq®) in the treatment of patients with juvenile-onset hypophosphatasia (HPP)

5/22/2022

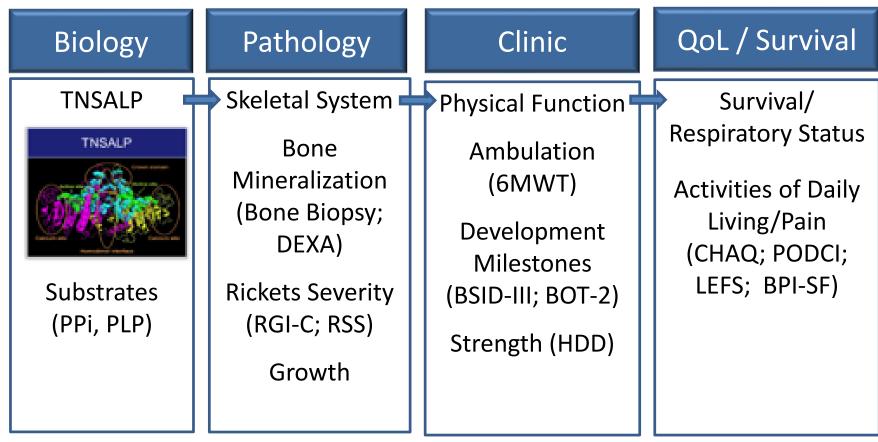
Hypophosphatasia (HPP)



Strensiq[®]



Strensiq® (asfotase alfa) [hypophosphatasia; HPP]



6MWT = 6 minute walk test; BOT 2 = Bruininks-Oseretsky Test of Motor Proficiency BPI SF = Brief Pain Inventory-Short Form; BSID III = Bayley Scales of Infant and Toddler Development; CHAQ = Child Health Assessment Questionnaire; DEXA = dual energy x ray absorptiometry; HHD = hand-held dynamometry; LEFS = Lower Extremity Functional Scale; PODCI = Pediatric Outcomes Data Collection Instrument; PLP = pyridoxal 5¹² phosphate; PPi = inorganic pyrophosphate; RGI C = Radiographic Global Impression of Change; RSS = rickets severity scale

Strensiq® (asfotase alfa) [hypophosphatasia; HPP]

Perinatal/Infantile-onset

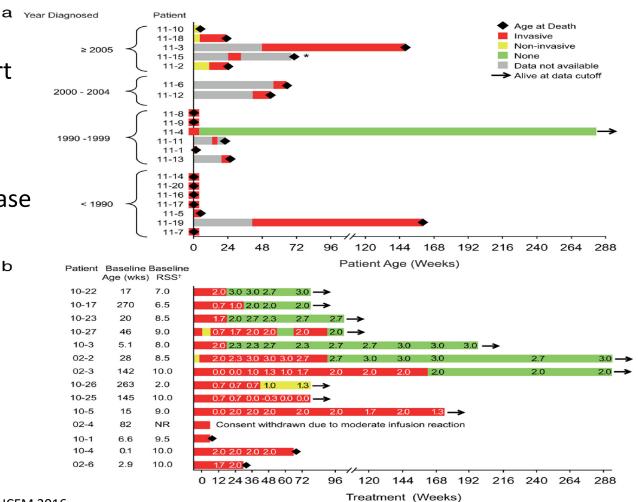
QoL / Survival Biology Clinic **Pathology** Skeletal System Survival/ **TNSALP** Physical Function Respiratory Status TNSALP Bone **Ambulation** Mineralization (6MWT) **Activities of Daily** (Bone Biopsy; Living/Pain Development DEXA) (CHAQ; PODCI; Milestones LEFS; BPI-SF) Rickets Severity Substrates (BSID-III; BOT-2) (PPi, PLP) (RGI-C; RSS) Strength (HDD) Growth

6MWT = 6 minute walk test; BOT 2 = Bruininks-Oseretsky Test of Motor Proficiency BPI SF = Brief Pain Inventory-Short Form; BSID III = Bayley Scales of Infant and Toddler Development; CHAQ = Child Health Assessment Questionnaire; DEXA = dual energy x ray absorptiometry; HHD = hand-held dynamometry; LEFS = Lower Extremity Functional Scale; PODCI = Pediatric Outcomes Data Collection Instrument; PLP = pyridoxal 5½ phosphate; PPi = inorganic pyrophosphate; RGI C = Radiographic Global Impression of Change; RSS = rickets severity scale

QoL/Survival

Perinatal/Infantile-onset

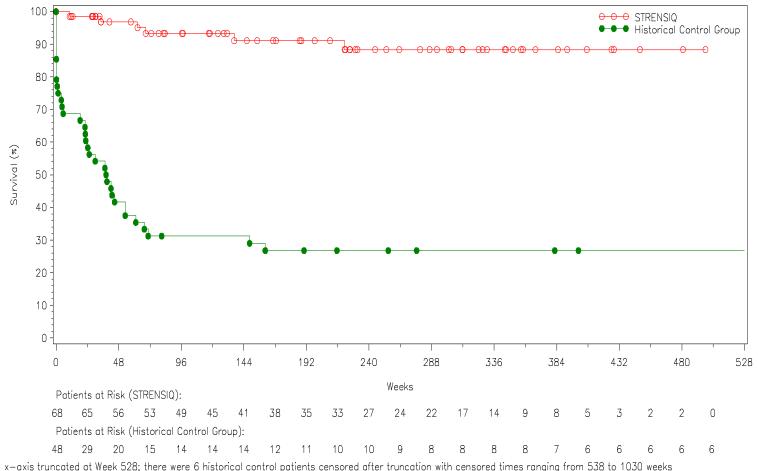
Ventilatory Support and Patient Outcomes: 20 Historical Control (top) and 14 Asfotase Alfa—Treated (bottom) Patients b



5/22/2022

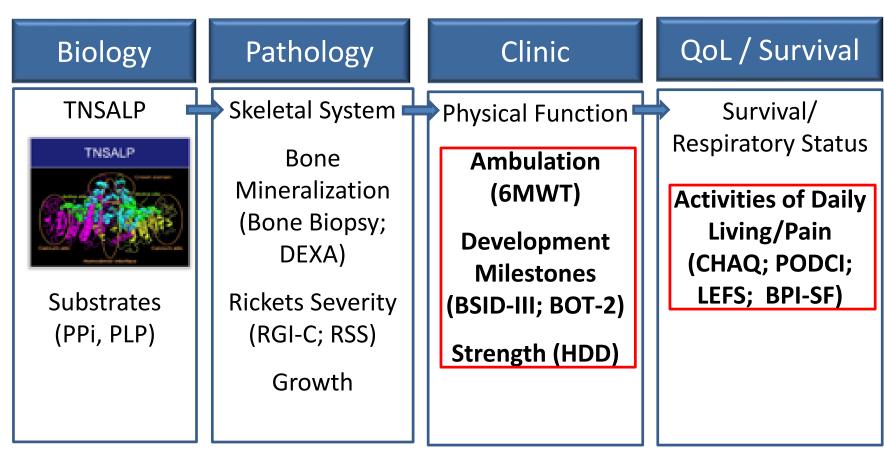
QoL/Survival

Perinatal/Infantile-onset



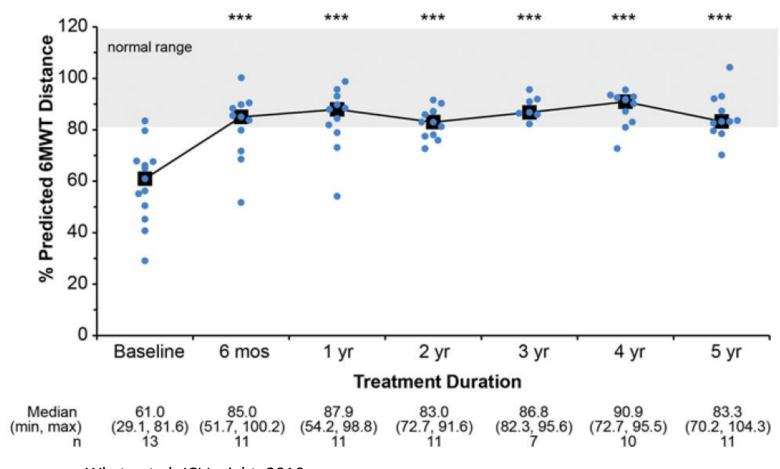
Strensiq® (asfotase alfa) [hypophosphatasia; HPP]

Juvenile-onset

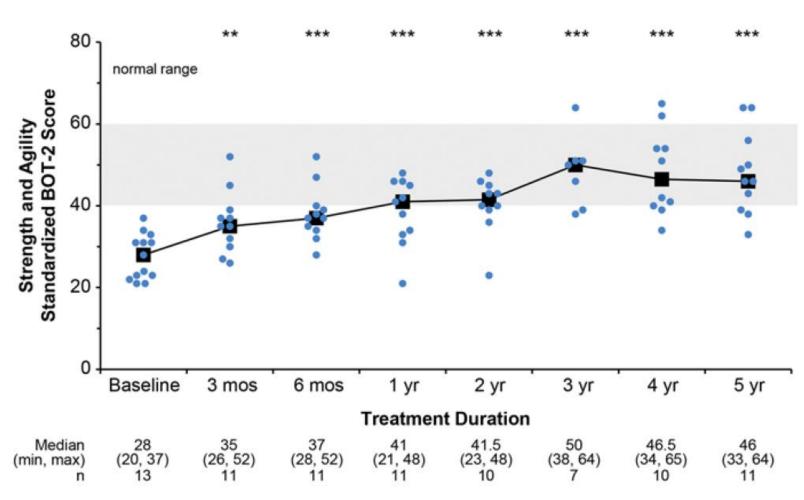


6MWT = 6 minute walk test; BOT 2 = Bruininks-Oseretsky Test of Motor Proficiency BPI SF = Brief Pain Inventory-Short Form; BSID III = Bayley Scales of Infant and Toddler Development; CHAQ = Child Health Assessment Questionnaire; DEXA = dual energy x ray absorptiometry; HHD = hand-held dynamometry; LEFS = Lower Extremity Functional Scale; PODCI = Pediatric Outcomes Data Collection Instrument; PLP = pyridoxal 5½ phosphate; PPi = inorganic pyrophosphate; RGI C = Radiographic Global Impression of Change; RSS = rickets severity scale

Juvenile-onset

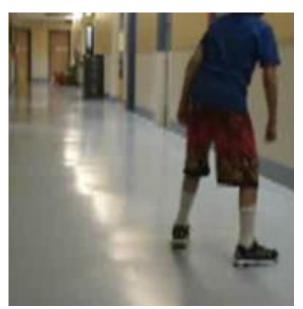


Juvenile-onset



Juvenile-onset

BOT2: Shuttle Run







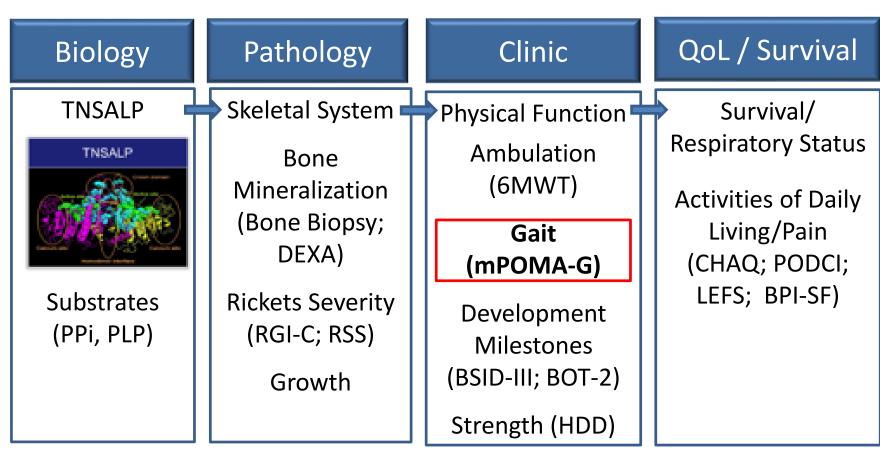
Baseline 22.2 sec

6 Months 12.3 sec

36 Months 8.6 sec

Strensiq® (asfotase alfa) [hypophosphatasia; HPP]

Juvenile-onset



6MWT = 6 minute walk test; BOT 2 = Bruininks-Oseretsky Test of Motor Proficiency BPI SF = Brief Pain Inventory-Short Form; BSID III = Bayley Scales of Infant and Toddler Development; CHAQ = Child Health Assessment Questionnaire; DEXA = dual energy x ray absorptiometry; HHD = hand-held dynamometry; LEFS = Lower Extremity Functional Scale; PODCI = Pediatric Outcomes Data Collection Instrument; PLP = pyridoxal 5½ phosphate; PPi = inorganic pyrophosphate; RGI C = Radiographic Global Impression of Change; RSS = rickets severity scale

Juvenile-onset

Performance-Oriented Assessment of Mobility Problems in Elderly Patients

Mary E. Tinetti, MD

Juvenile-onset

Development and validation of a modified performance-oriented mobility assessment tool for assessing mobility in children with hypophosphatasia

Dawn Phillips^{a,1,*}, Donna Griffin^b, Tracy Przybylski^b, Erica Morrison^b, Amy L. Reeves^b, Marc Vallee^c, Kenji P. Fujita^d and Katherine L. Madson^{b,1}

[&]quot;Division of Physical Therapy, University of North Carolina, Chapel Hill, NC, USA

bShriners Hospitals for Children, St. Louis, MO, USA

Biostatistics, Alexion Pharmaceuticals, Inc., Boston, MA, USA

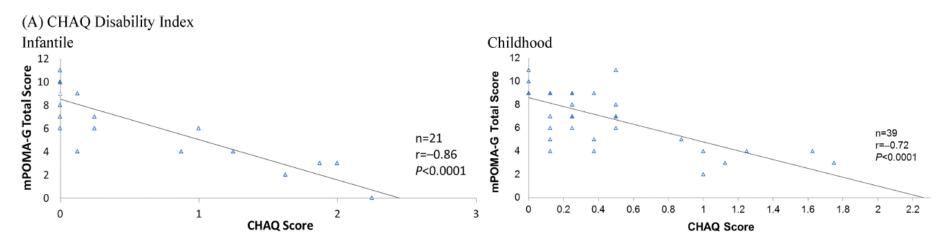
dClinical Development, Alexion Pharmaceuticals, Inc., Boston, MA, USA

mPOMA-G Review and Adaptation

- An expert panel of physicians, physical therapists, and statisticians evaluated the suitability of the POMAG for assessing gait in children with HPP using observational, non-instrumented video footage
- Most POMA-G components were relevant and could be used
- Several modifications were recommended to adapt it for use in children with HPP resulting in the modified POMA-G (mPOMA-G)
- Modifications included:
 - (1) removing the rating of initiation of gait;
 - (2) expanding the assessment of step length and step continuity;
 - (3) removing the rating of path;
 - (4) adding new items within observations for step length and height;
 - (5) clarifying descriptions of specific items to increase sensitivity and consistency among raters; and
 - (6) Creating a scoring key that provides detailed instructions and illustrations

mPOMA-G Validation

- Concurrent validation of mPOMA-G scores was made to other outcome measures assessing functional impairments
- Pearson correlation coefficients demonstrated strong concurrent validity between mPOMA-G scores and
 - Childhood Health Assessment Questionnaire (CHAQ) Disability Index,
 - Pediatric Outcomes Data Collection Instrument (PODCI), and
 - 6-Minute Walk Test.

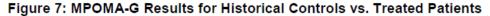


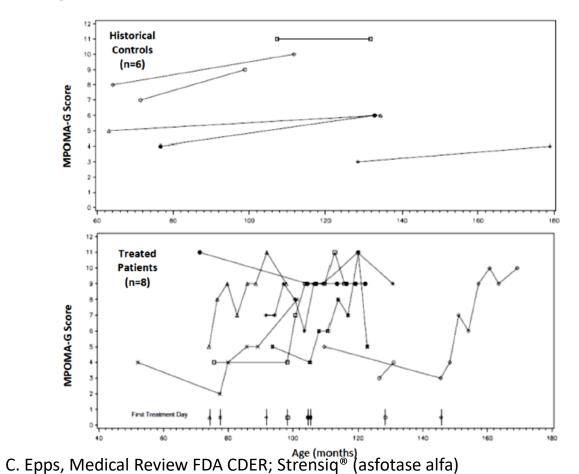
mPOMA-G Application

- Conducted in accordance with GCP and after IRB review and approval.
 Parents or legal guardians of the patients provided written informed consent and patients provided written assent. Visible faces in videos were permanently blurred, and all videos (n = 64) were assigned a new masking code and randomized before each scoring
- 3 trained physical therapists applied the mPOMAG to score videos of 14 children with HPP while walking.
- Patients (age range: 5–15 years) were enrolled in an open-label asfotase alfa clinical study (NCT00952484) with extension (NCT01203826) or a natural history study (NCT02235493)
- Videos of children in the treated group (n = 8) were taken before and after treatment; videos of children in the natural history group (n = 6) were taken at routine follow-up visits

mPOMA-G Application

The median (range) rate of change per year was 2.51/year (0.0, 4.6) in asfotase alfa-treated patients compared with 0.33/year (0.0, 0.9) for untreated historical controls (p=0.0303, Wilcoxon rank-sum test)





Forward Recommendation

- In the development of rare/ultra-rare disease, build in a forward review of assessment tools in alternative disease areas with relevant morbidity/functional disability
- Consider its application in the development program and review/modify the clinimetric characteristics when applied to the specific disease under study
- Conduct rater training and assessment tool validation using established scales
- Apply to relevant natural history and study drug datasets

5/22/2022

Henrik Zetterberg

Professor of Neurochemistry

University of Gothenburg and University College London

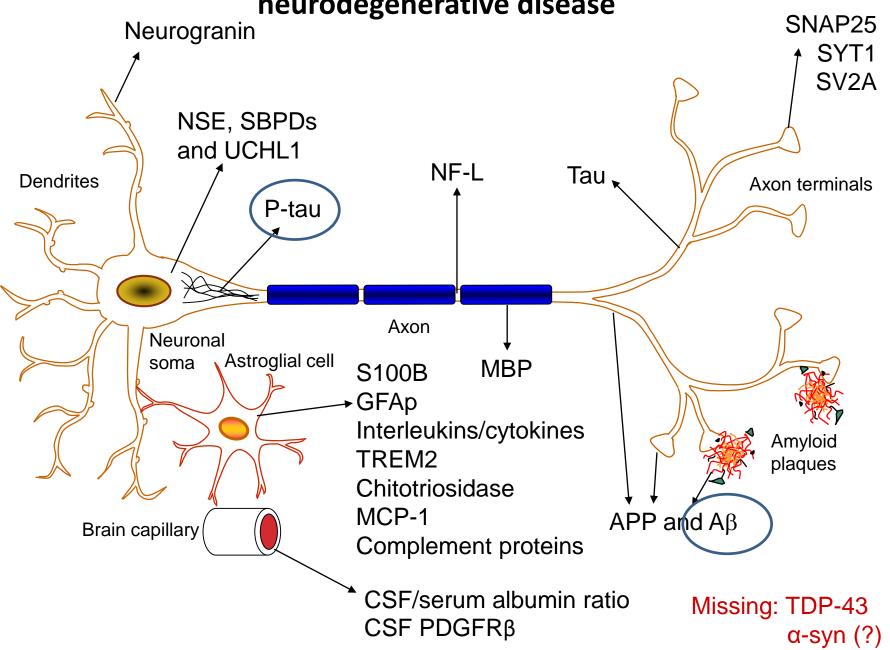




Development and validation of cerebrospinal fluid and blood biomarkers for neurodegenerative diseases

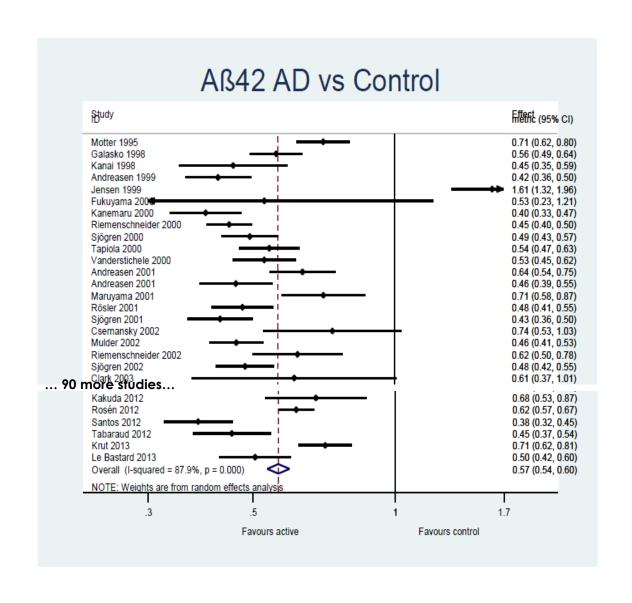
Henrik Zetterberg, MD, PhD
Department of Psychiatry and Neurochemistry,
University of Gothenburg, Sweden;
Institute of Neurology and UK Dementia Research Institute, UCL, UK

Fluid biomarker candidates of potential relevance to neurodegenerative disease



A = amyloid pathology

CSF Aβ42 is decreased in AD



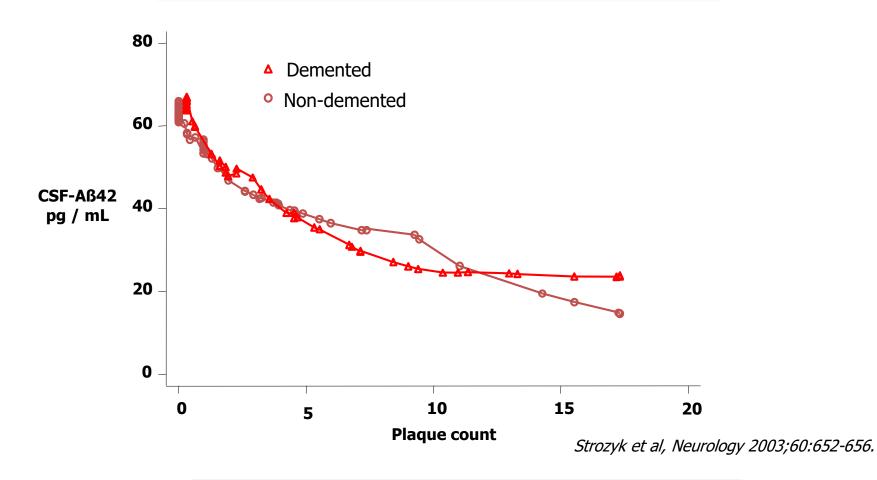


CSF Aβ42 is a marker of amyloid plaque pathology

Study design: 155 autopsy cases

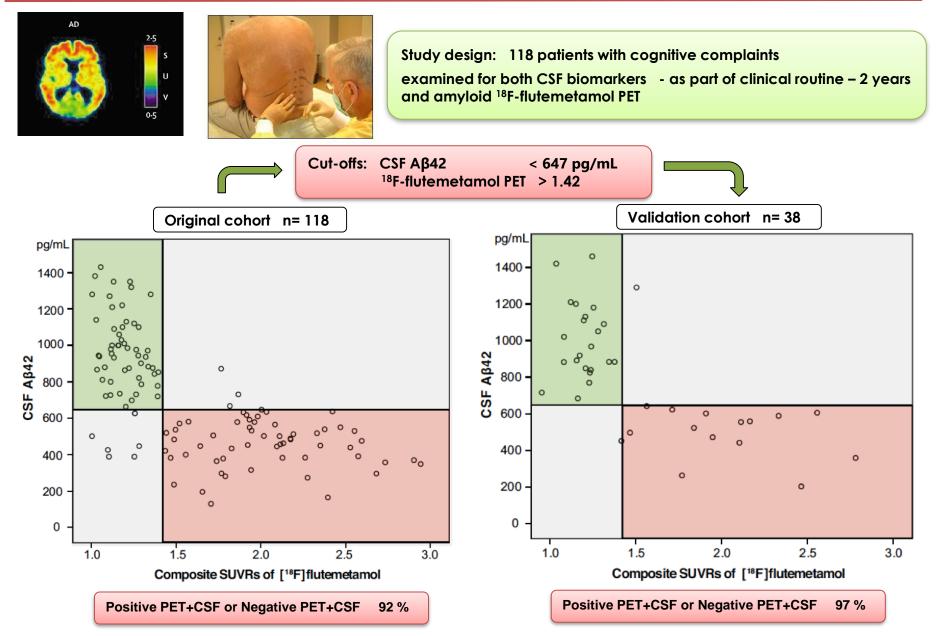
Plaque counts – neocortex and hippocampus

Post-mortem CSF samples



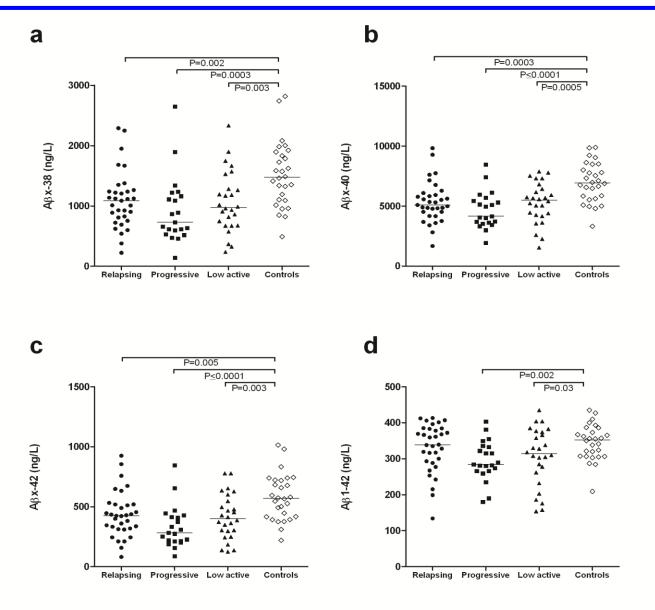
→ CSF Aβ42 correlates with amyloid cortical amyloid plaque load

CSF Aβ42 concentration correlates with amyloid PET



Palmquist S, et al, JAMA Neurol 2014

CSF Aβ42 concentration may be decreased in neuroinflammatory conditions



Augutis et al., Multiple Sclerosis 2013

CSF Aβ42 concentration may be decreased in normal pressure hydrocephalus

Table 2 LCSF biomarkers in patients with iNPH and HI ^a			
	iNPH (n = 28)	HI (n = 20)	iNPH/HI ratio
NFL	1,260 (840-2,290) ↑	825 (653-1,243)	1.53 ^b
МВР	1.5 (1.1-1.9) ↔	1.3 (1.0-1.5)	1.12 NS
Аβ38	637 (438-894) ↓	1,641 (1,231-2,173)	0.39°
Αβ40	5,067 (3,634-6,573) ↓	10,083 (7,626-12,794)	0.50°
Αβ42	221 (156-325) ↓	498 (391-669)	0.44 ^c
$sAPP\alpha$	505 (338-739) ↓	1,110 (727-1,244)	0.46°
sAPPβ	176 (110-258) ↓	414 (250-545)	0.43°
t-tau	39 (34-50) ↓	84 (64-107)	0.47 ^c
p-tau	39 (33-50) ↓	59 (47-75)	0.67 ^d
IL-8	34 (26-38) ↔	31 (26-40)	1.10 NS
IL-10	0.66 (0-0.9) ↔	0.67 (0-0.8)	0.99 NS
MCP1	746 (602-874) ↑	628 (564-686)	1.19 ^b
Albumin C	SF 287 (188-408) ↔	232 (203-280)	1.24 NS
Albumin ra	tio 6.8 (5.0-10) ↔	5.6 (4.5-6.4)	1.22 NS

Abbreviations: $A\beta$ = amyloid β ; HI = healthy elderly individuals; IL = interleukin; iNPH = idiopathic normal-pressure hydrocephalus; LCSF = lumbar CSF; MBP = myelin basic protein; MCP1 = monocyte chemoattractant protein 1; NFL = neurofilament light protein; NS = nonsignificant; p-tau = phosphorylated tau; sAPP = soluble amyloid precursor protein; t-tau = total tau.

^a Arrows indicate levels in iNPH in comparison with HI. Values are given as median (Q1-Q3 range).

 $^{^{}b}p \leq 0.05.$

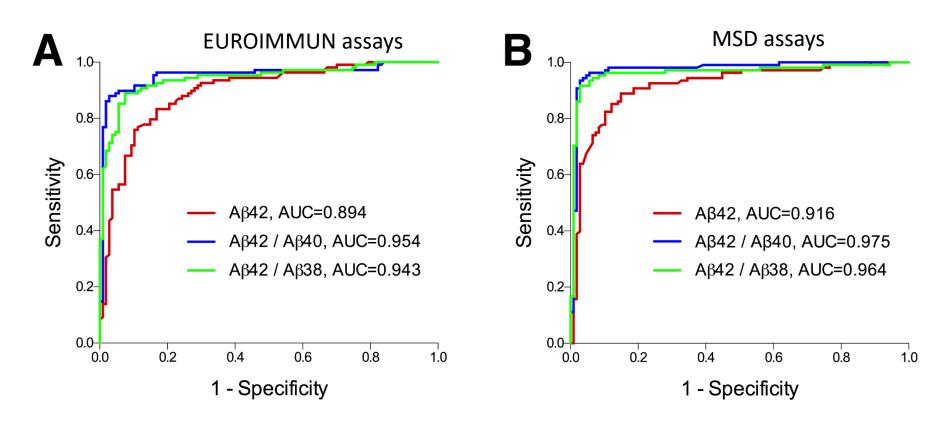
 $^{^{}c}p \leq 0.001.$

 $^{^{}d}p \leq 0.01.$

...and there may be constitutively low A β producers who are close to the A β 42 cutpoint for positivity

The CSF A β 42/A β 40 ratio corrects for this

CSF Aβ42/40 (or Aβ38) and PET Aβ

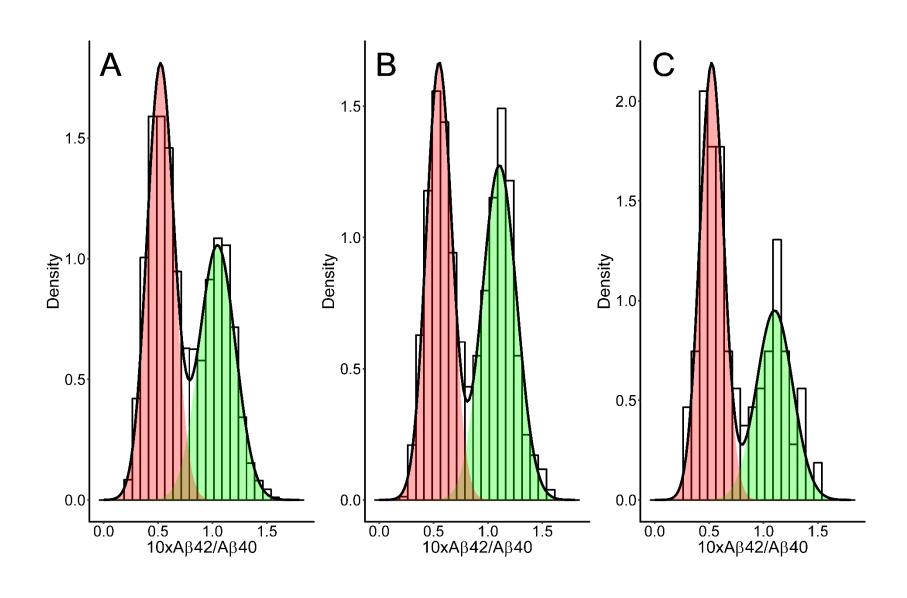


Cohort: Swedish BioFINDER

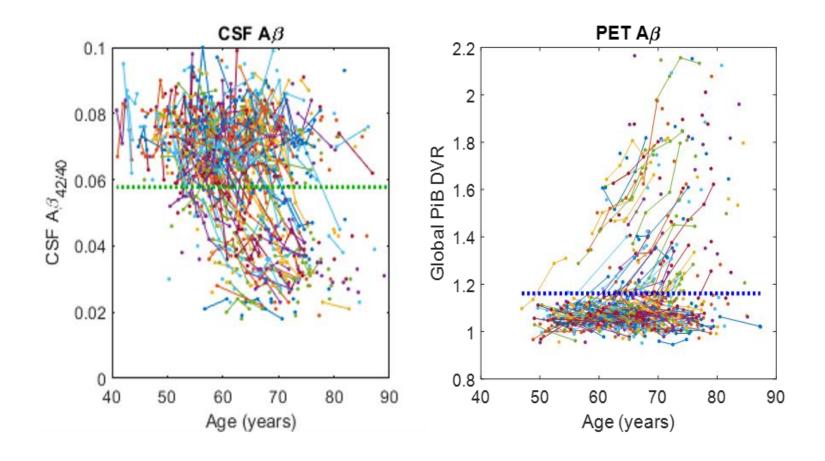
215 SCD/MCI (108 PET+ and 107 PET-)

PET: flutemetamol

The CSF Aβ42/Aβ40 ratio in clinical practice

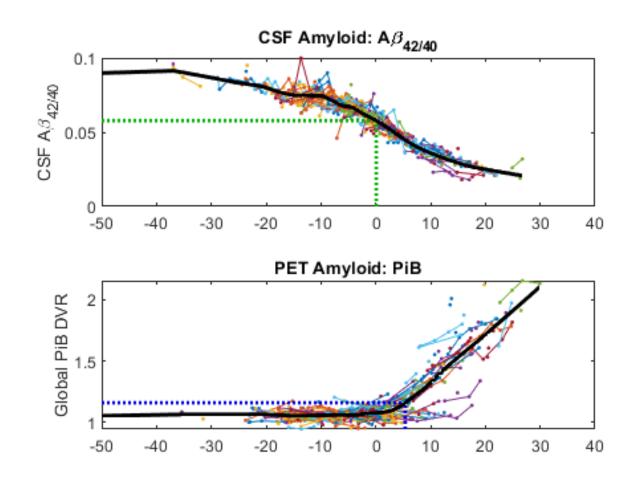


CSF Aβ42/Aβ40 ratio – longitudinal data



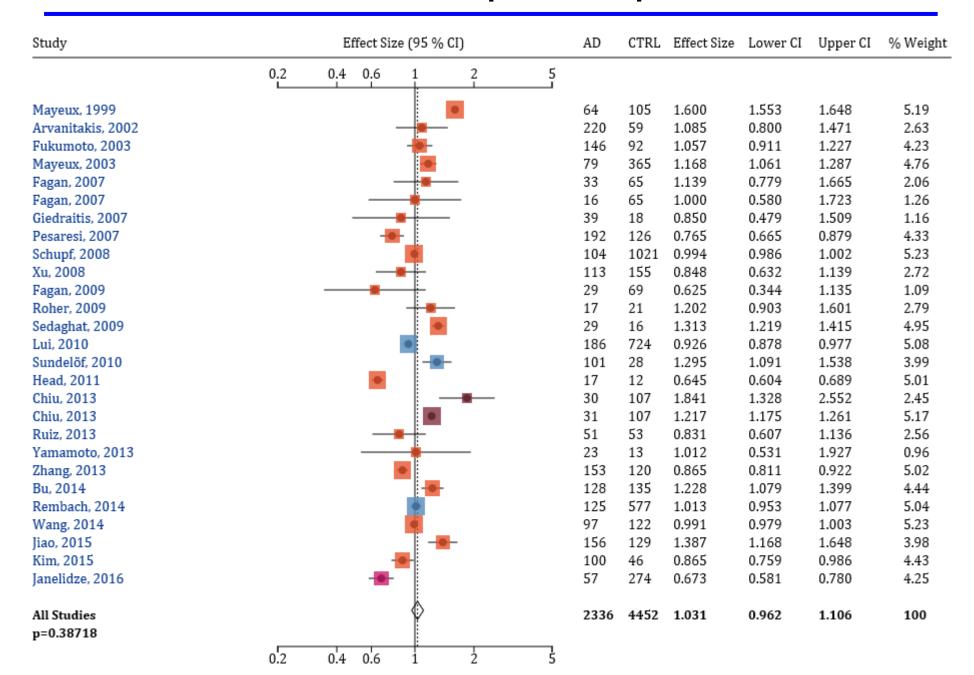
Betthauser T et al., AAIC 2021 Neuroimaging: Multimodal Biomarkers July 27, 2021

CSF Aβ42/Aβ40 ratio – longitudinal data

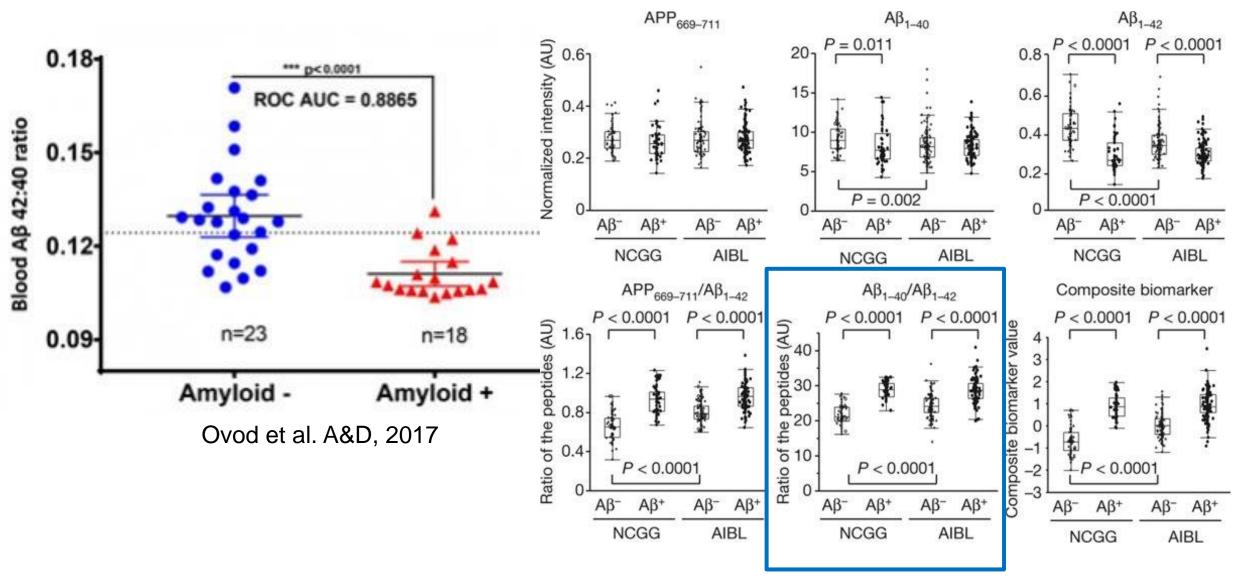


Betthauser T et al., AAIC 2021 Neuroimaging: Multimodal Biomarkers July 27, 2021

How about plasma Aß?



Highly sensitive and precise mass spec methods work



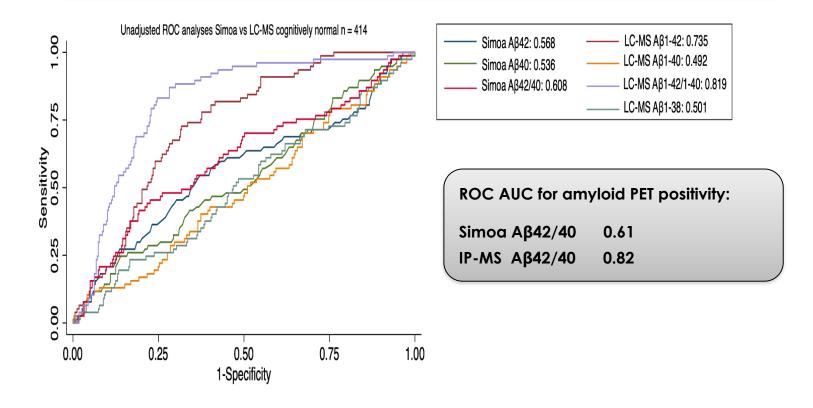
Nakamura et al., Nature, 2018

Plasma AB in the Insight46 cohort

Study design: Insight46 - epidemiological study people born 1946 (n= 414 cognitively unimpaired)

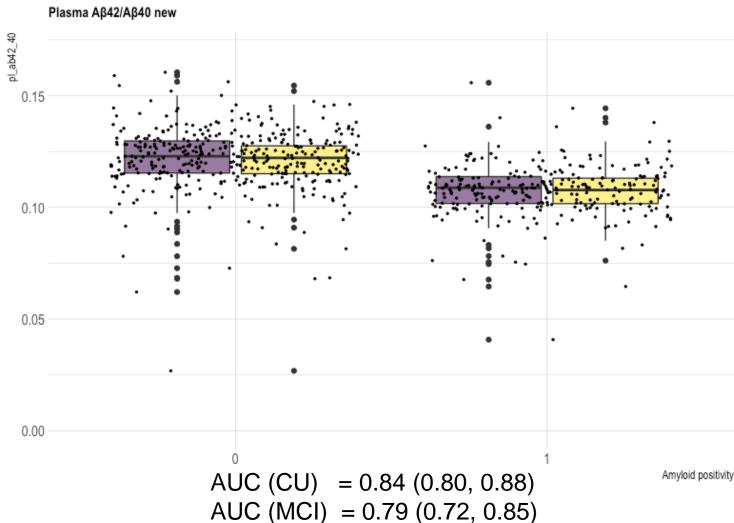
APOE genotype, neuropsych testing, amyloid PET

Plasma Aβ42, Aβ42/40 using immunoassay (Simoa) and IP LC-MS/MS



 \rightarrow Plasma A β 42 and A β 40/42 ratio by IP-MS/MS show high concordance with brain amyloidosis

Plasma Aβ42/Aβ40 ratio using a fully automated Cobas assay

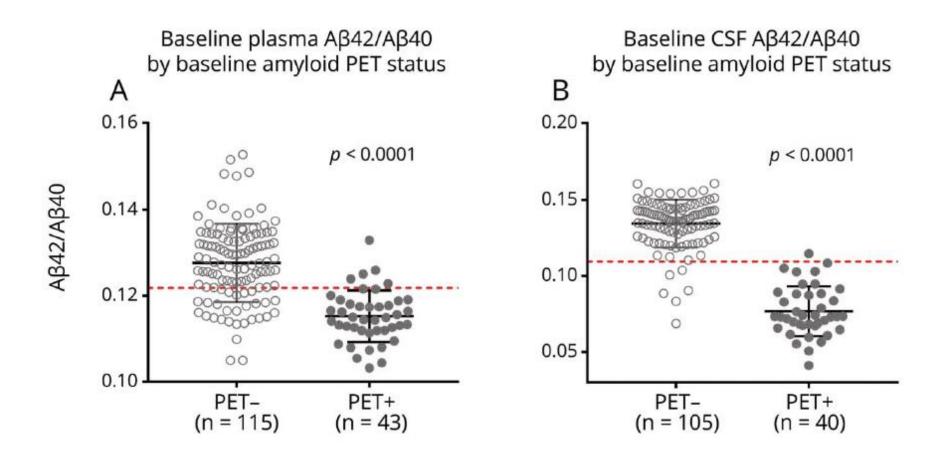


Purple = CU

Yellow = MCI

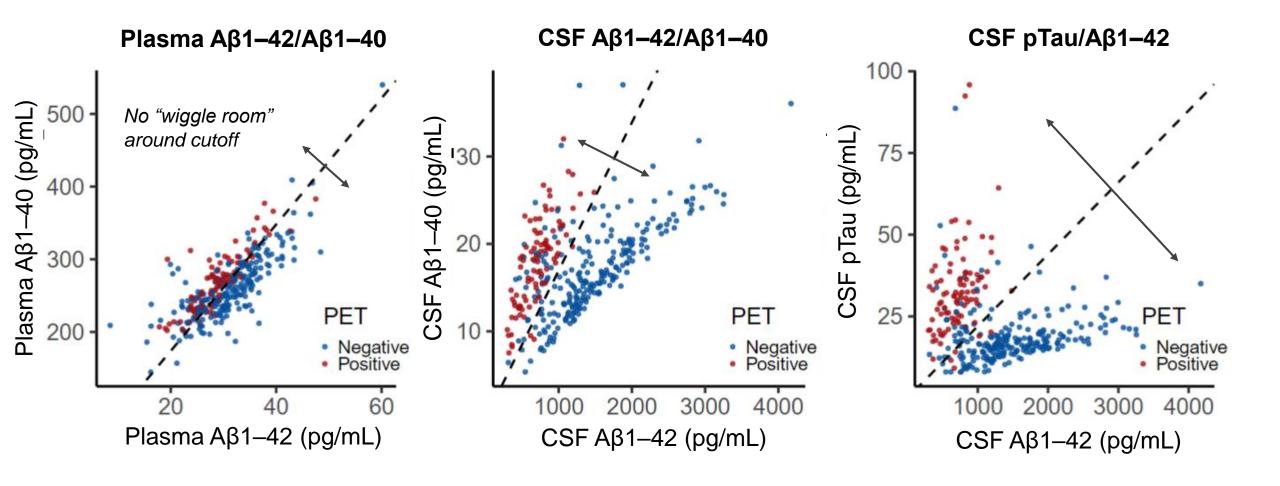
Palmqvist *et al*., unpublished

The challenge



The fold reduction in CSF Aβ ratio is much greater than in plasma because of peripheral Aβ

The challenge, continued...

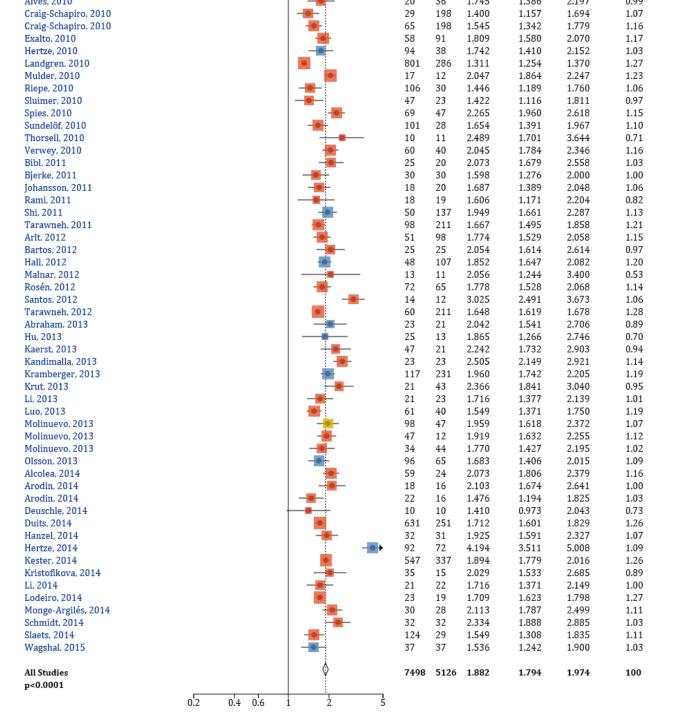


Diagnosing amyloid pathology with a blood test: are we there yet?

Group level enrichment/screening: Yes

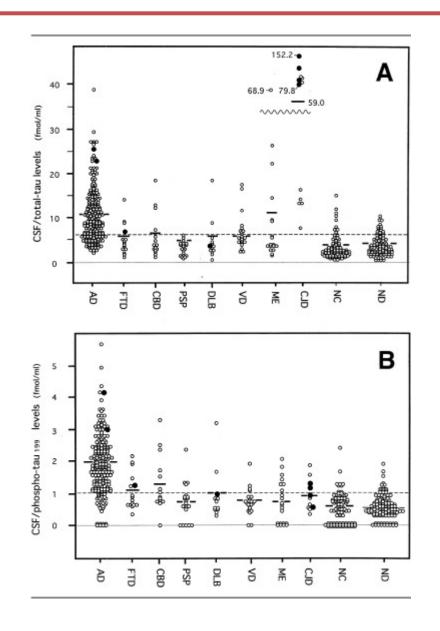
Individual diagnostics: No, or maybe, but with great caution

T = tau pathology

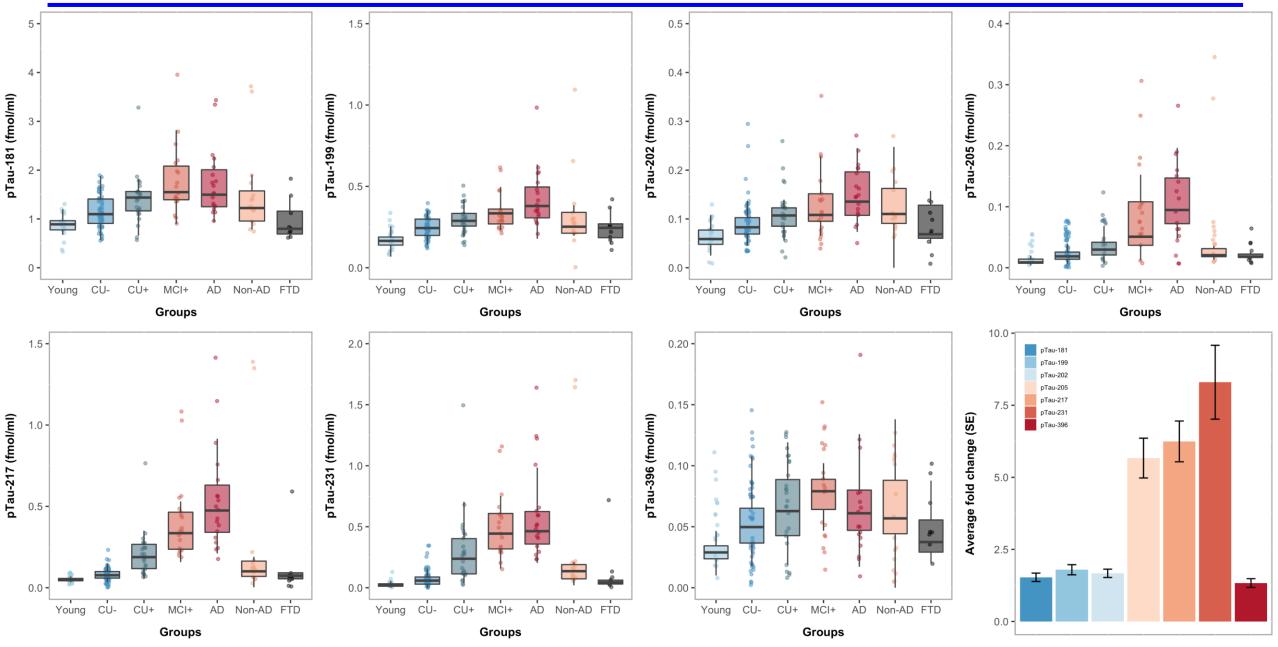


CSF P-tau is increased in AD

AlzBiomarker Database

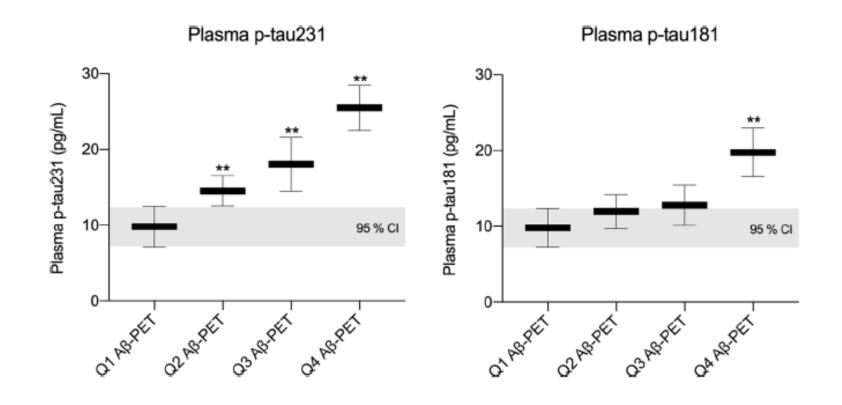


Differential detection of AD measuring different phospho-forms of tau in CSF

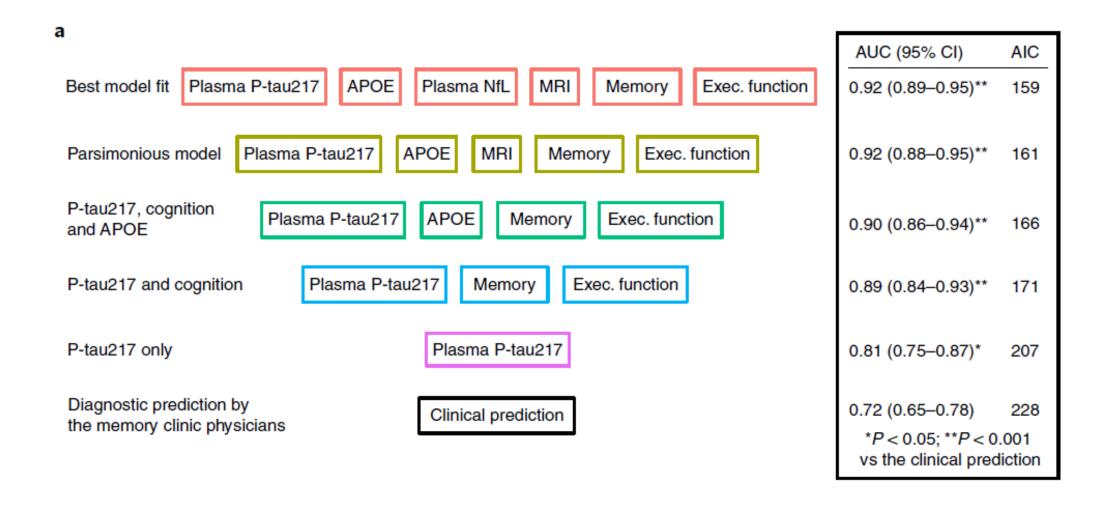


Benedet, Gobom et al., unpublished

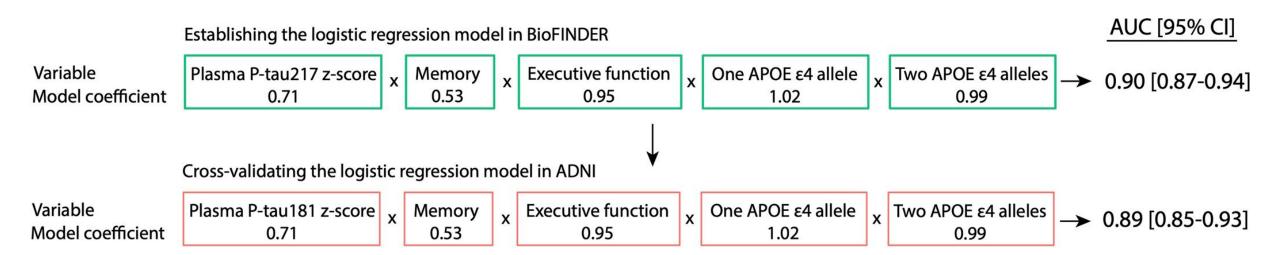
Different phospho-forms of tau can be measured in plasma



Plasma tests as clinical tools to predict AD-type dementia in patients with subjective or mild cognitive impairment

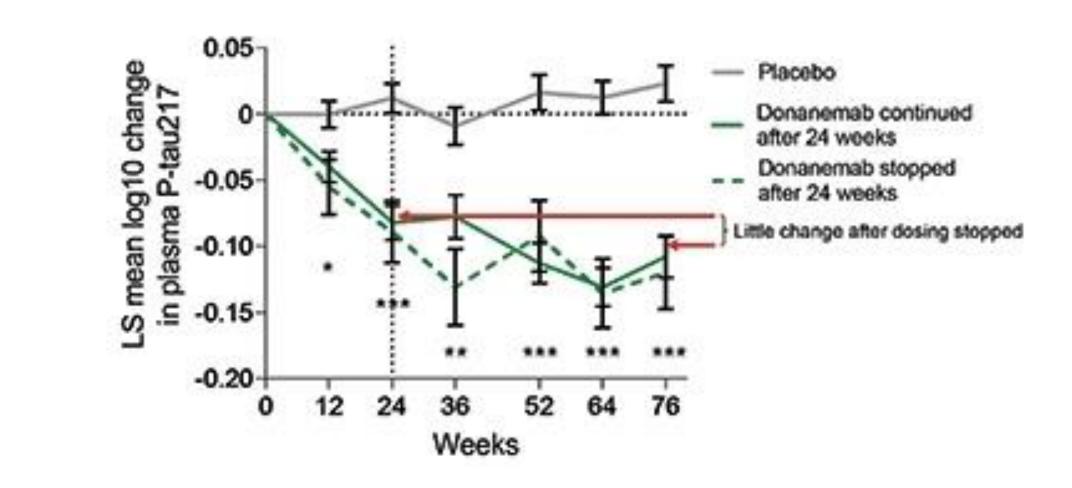


Establishing a cross-validated model



http://predictAD.app

Donanemab lowers plasma P-tau217



Aducanumab lowers plasma P-tau181

TABLE 1. REDUCTIONS IN PHOSPHORYLATED TAU-181 WITH ADUCANUMAB TREATMENT VS PLACEBO

	Aducanumaba	Placebo	P Value
EMERGE (NCT02484547)	-13%	+8%	P<0.001
ENGAGE (NCT02477800)	-16%	+9%	P<0.001

^a Values are with the higher of 2 doses used in the EMERGE and ENGAGE trials.

Diagnosing AD-type tau pathophysiology with a blood test: are we there yet?

Group level enrichment/screening: Yes

Individual diagnostics: Yes, at least we are getting there

Thanks!!
henrik.zetterberg@gu.se
h.zetterberg@ucl.ac.uk



Lesley Inker

Professor of Medicine

Tufts University School of Medicine



GFR Decline as a Surrogate Endpoint for Progression of CKD

Clinical Validation and Regulatory Acceptance of Biomarkers as Surrogate Endpoint Translational Science in Drug Development: Surrogate Endpoints, Biomarkers, and More May 25 2022

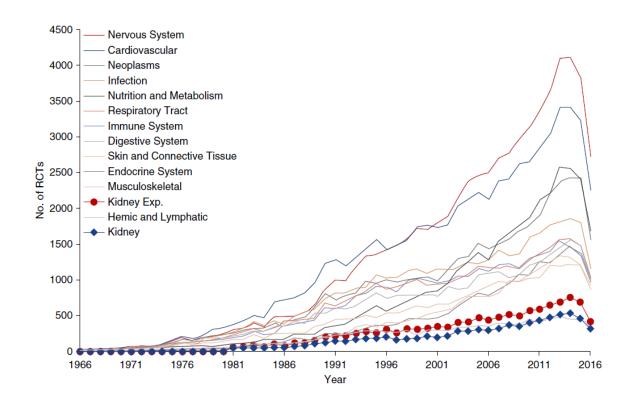
Lesley A Inker MD, MS

Co-Director, Chronic Kidney Disease-Epidemiology Collaboration Tufts Medical Center & Tufts University School of Medicine, Boston MA

Background

- Kidney disease is slowly progressive
- Clinical trials to evaluate treatments to prevent or slow the progression to kidney failure require long duration of follow-up, leading to expensive and complex trials, or highly selected subset of participants
- Doubting of serum creatinine (57% decline in GFR) is accepted by regulators but still occurs late in disease course
- These challenges have likely contributed to the paucity of therapies to treat CKD

Number of RCT in kidney related domains compared to other medical fields Kriakos et al JASN 2019.



GFR slope and albuminuria are the two central biomarkers in

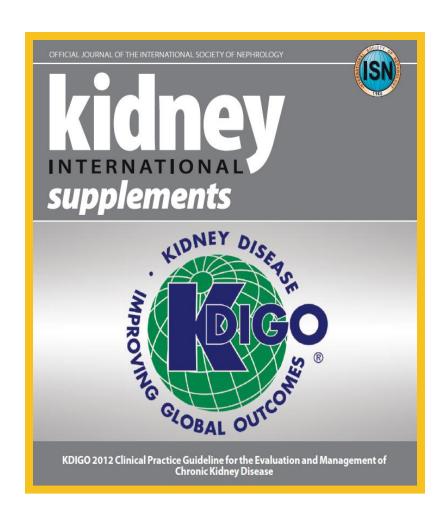
categories (ml/min/ 1.73 m²) Description and range

G2

G3a

G3b

G5



Prognosis of CKD by GFR and albuminuria category

Prognosis of CKD by GFR and Albuminuria Categories: KDIGO 2012

Normal or high

Mildly decreased

decreased Moderately to

Mildly to moderately

severely decreased

Severely decreased

Kidney failure

	Persistent albuminuria categories Description and range			
	A1	A2	АЗ	
	Normal to mildly increased	Moderately increased	Severely increased	
	<30 mg/g <3 mg/mmol	30-300 mg/g 3-30 mg/mmol	>300 mg/g >30 mg/mmol	
≥90				
60-89				
45-59				
30-44				
15-29				
<15				

Green: low risk (if no other markers of kidney disease, no CKD); Yellow: moderately increased risk; Orange: high risk; Red, very high risk.

CKD-EPI Investigations of Surrogate Endpoints for Trials in CKD Progression

NIH U01 CKD-EPI includes evaluation of urine protein as surrogate

NKF-FDA Workshop May 2008 on UP NKF-FDA Workshop December 2012 Lesser Decline in GFR

NKF-FDA-EMA
Workshop
March 2018
GFR Slope and UACR

CKD-EPI CT Funding in partnership with NKF and sponsors

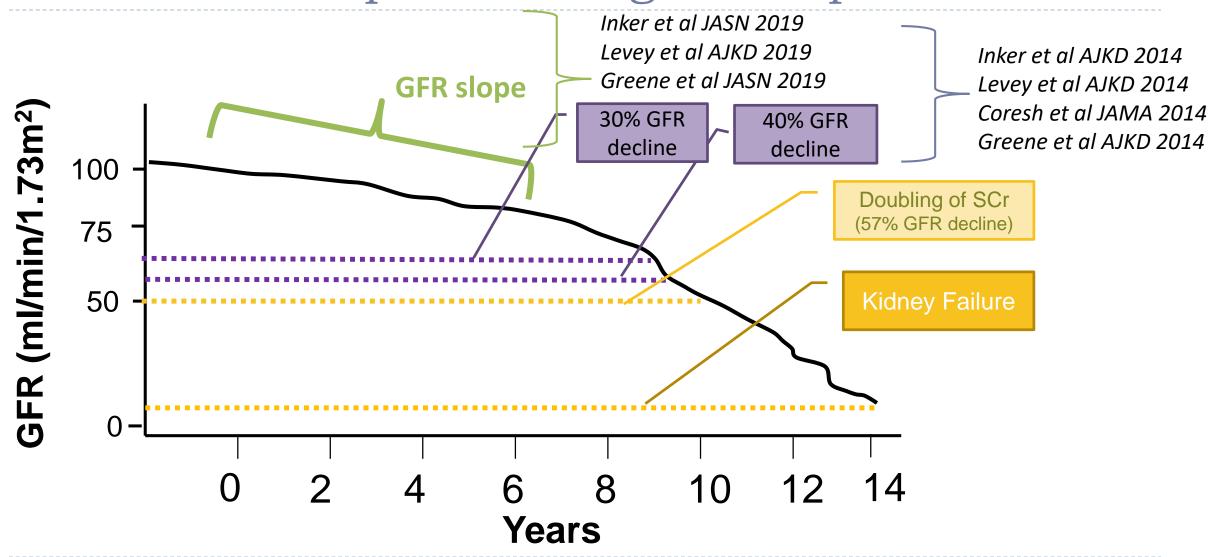
Data identification, acquisition and cleaning; analyses; method development

Updated literature search; refined methods

Continual literature updates; Enhanced method development

2003 > 2008 > 2012 > 2016 > 2018 > 2020 > 2022

Use of GFR slope as surrogate endpoint



Use of GFR slope as surrogate endpoint

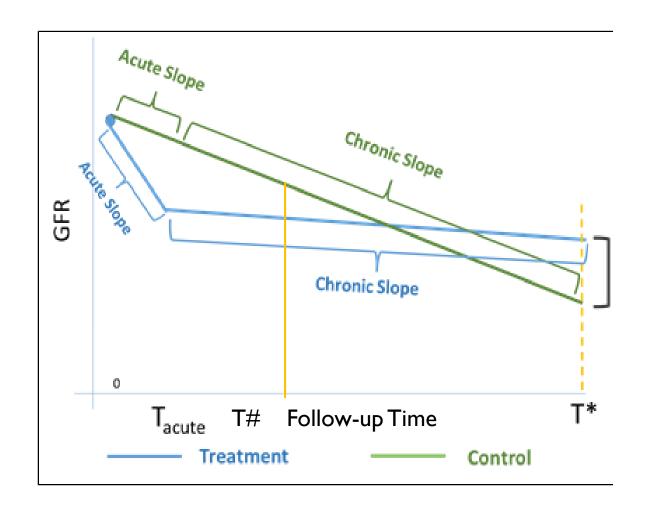
Advantages

- Regardless of cause
 - Decreased GFR defines CKD
 - Level of GFR indicates severity
 - GFR decline is the definition of progression, for all causes
- Compared to time to event
 - Increased power
 - Includes fast and slow progressors
 - Includes patients who have GFR decline that might lead to endpoint even after the end of the trial

Limitations/complications

- eGFR can reflect GFR as well as non GFR determinants
- Nonlinearity
- Heterogeneity
- Informative censoring
- Acute effects

Challenge of acute effects in GFR slope



GFR= N X SNGFR

Control arm
Declining N (number of nephrons)
Stable SNGFR (single-nephron GFR)

Treatment arm

short-term - ↓ SNGFR, no change in N

long-term - stable SNGFR, slower decline in N

T, Time SNGFR, single nephron GFR

Models for computation of GFR Slope

- ▶ Goal: Provide a set of models that accommodate the range of circumstances expected in trials of CKD progression
- Linearity: In general, reasonable assumption that moderate deviations from linearity in the chronic phase do not effect overall slope estimates in trials that are relatively short in duration
- 2-slope model to allow for acute treatment effect on GFR that differs from chronic slope

Vonesh E, Tighiouart H, Ying J et al Mixed-effects models for slope-based endpoints in clinical trials of chronic kidney disease. Stats in Medicine 2019



GFR slope model parameters

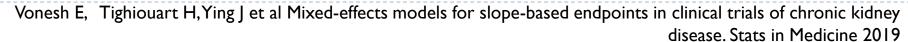
Informative censoring: For studies with > 15 ESRD/Death events, used shared parameter models with Weibull survival times

Heterogeneity

- **Between subject:** Random slopes and intercepts
- Within subject: Power of the means model to allow greater variability at higher GFR
- Treatment effect: Allowed different slope variance in each group to accommodate non-uniform treatment effects

Model Selection

Automated algorithm used to select first the most complicated model (shared parameter and all of heterogeneity components), followed by models that did not have one or more of the parameters

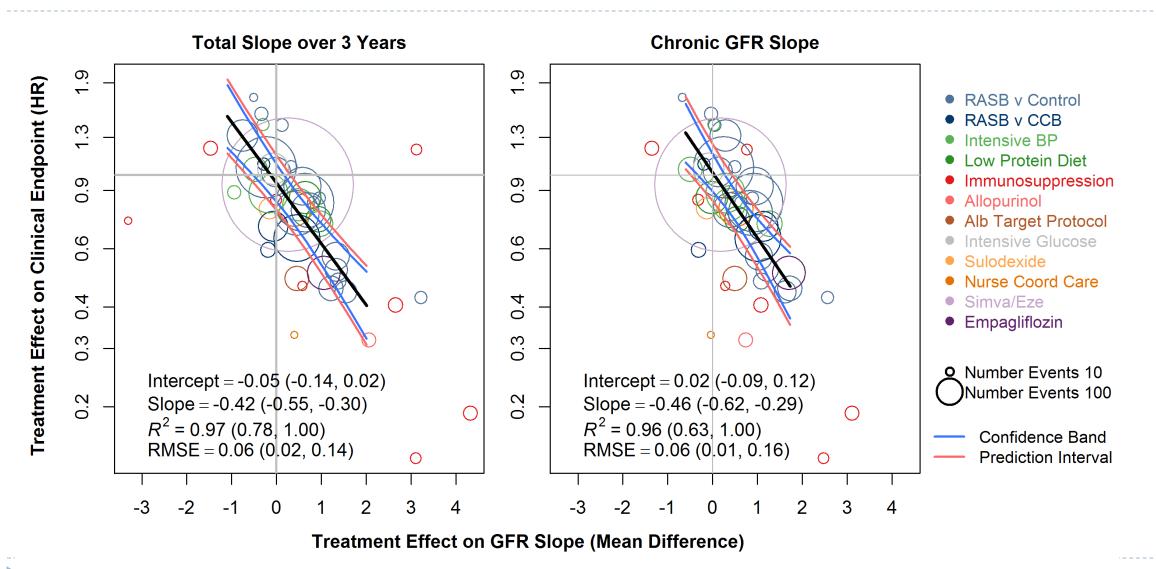


Trial Level Analyses: evaluate the association between treatment effects on GFR slope to that of the clinical endpoint across range of RCT's

Individual patient meta-regression

- Consistent definitions
- Correlation between errors in the estimated treatment effects
- Within study analyses:
 - ▶ Estimated treatment effects on GFR slope: GFRslopeTreatment GFR SlopeControl
 - ▶ Estimated treatment effects on the clinical endpoints Cox models, expressed as HR
- Bayesian meta-regression to obtain
 - Estimate of regression line as summarized by slope, intercept, RMSE and R²
 - Prediction intervals for HR on the clinical endpoints for future trial over a range of the treatment effect on the mean difference in GFR slopes

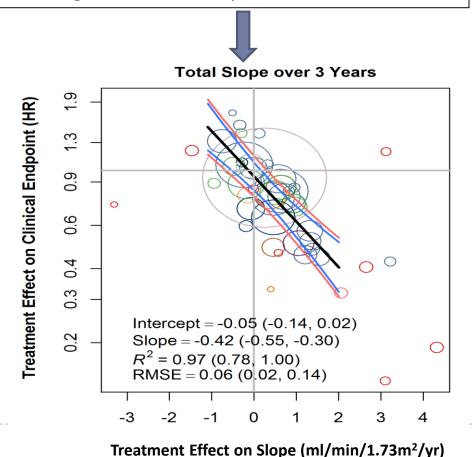
Trial-level analyses for the association of treatment effects on 3 year-total slope and chronic slope vs treatment effects on the clinical endpoint



Applying Trial Level Analyses to a New RCT

Trial Level Analysis in Previous RCTs

Characterizes "causal association" between ITTbased estimates of treatment effects on surrogate & clinical endpoints





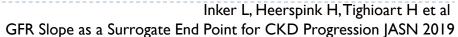
Application in New RCT

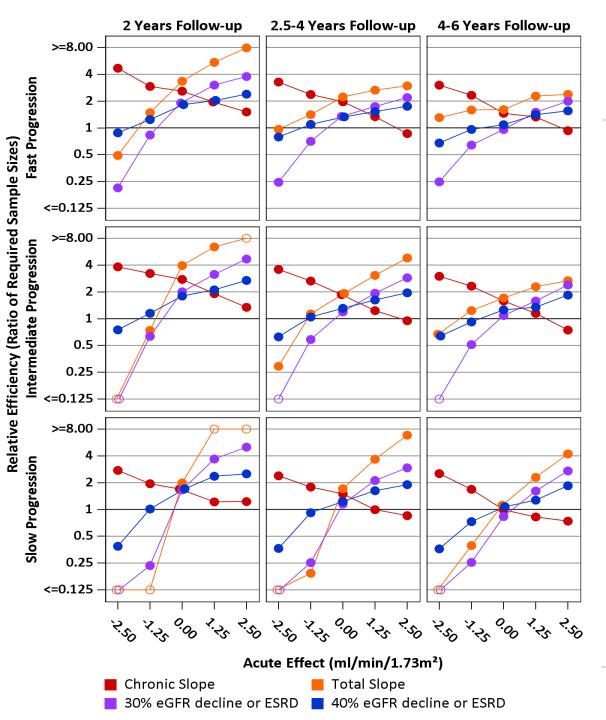
Convert estimated treatment effect on surrogate(s) to probability of clinical benefit for newly tested intervention



Converting Treatment Effect on 3-Yr Total Slope to Probability of Clinical Benefit

Estimated	Large RCT		Moderate RCT		
Effect on GFR Slope (ml/min/1.73m²/yr)	Median HR and 95% Prediction Interval	PPV	Median HR and 95% Prediction Interval	PPV	
0.5	0.77 (0.59, 0.99)	0.98	0.77 (0.53, 1.11)	0.93	
0.75	0.69 (0.52, 0.89)	>0.99	0.69 (0.47, 1.00)	0.98	
1.0	0.62 (0.47, 0.80)	>0.99	0.62 (0.42, 0.90)	>0.99	
Threshold for effect on GFR slope to confer PPV ≥ 97.5	0.48		0.74		





- Use of total slope instead of the clinical endpoint allows reduction in follow-up from 4-6 years to 2 years while improving efficiency by 17% to 64% (~sample size savings of 14% to 39%)
- Relative gains in power for slope analysis increase when baseline GFR is higher.
- Acute effect is critical consideration in selection of total vs chronic slope vs endpoint

Next steps/current work

Update set of studies to account for well powered studies across more interventions

- Methods work on
 - Acute effects
 - Subgroups/interactions

▶ Joint models to combine slope with albuminuria as can be used in Phase II studies with shorter follow-up



Summary

 Empirical data supports use of GFR decline as surrogate endpoints in RCTs evaluating therapies in CKD

When applying these data to the design of a future trial, the most appropriate endpoint for the new trial needs to be considered in the context of the trial phase, specific population, treatment, and design.



Andy Levey, Tom Greene and Josef Coresh



March 2018 CKD-EPI, CKD-PC, EMA, FDA and NKF Teams



CKD-EPI CT Analytical Team



Co Directors:Tom Greene, Hiddo Heerspink

Tufts: Juhi Chaudhari Hocine Tighiouart Jonathan Miao

Utah: Ben Haaland, Jian Ying, Willem Hardie

Chicago: Ed Vonesh

Groningen: Neils Jong

Nicole Gormley

Acting Division Director

Division of Hematologic Malignancies

US Food and Drug Administration



USE OF SURROGATE ENDPOINTS IN ONCOLOGY

DUKE MARGOLIS WORKSHOP MAY 25, 2022

Nicole Gormley, MD

Division Director

Division of Hematologic Malignancies II

U.S. Food and Drug Administration

www.fda.gov 79



Outline

- Regulatory Considerations for Biomarker Development
- pCR Example
- MRD in Multiple Myeloma
- Future Directions

Potential uses of Biomarkers

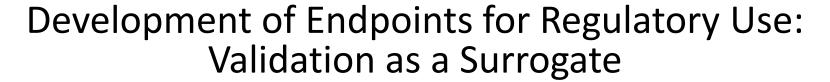


- Prognostic Biomarker
- Clinical Uses
 - Screening/Early Detection
 - Monitor for relapse
 - Guide therapeutic decisions
- Regulatory Uses
 - Patient Stratification
 - Patient Selection/Enrichment
 - Risk-based treatment assignment
 - Intermediate Endpoint or Surrogate Endpoint

Biomarker as an Endpoint



- Intermediate clinical endpoint
 - Can be measured earlier than morbidity or mortality,
 but reasonably likely to predict clinical benefit
- Surrogate endpoint reasonably likely to predict clinical benefit
- Surrogate Endpoint
 - Clinical validation that the marker predicts clinical benefit





- Prentice Criteria
 - The surrogate must be a correlate of the true clinical endpoint
 - The treatment effect on the surrogate should capture the full effect of treatment on the clinical endpoint
- Meta-analytical methods
 - Patient-level data
 - Allow for assessment of Individual Level and Trial Level Surrogacy
 - Individual Surrogacy- Correlation between candidate surrogate and true clinical endpoint on an individual level
 - Trial Level Surrogacy- Correlation between effect of treatment on the candidate surrogate and the effect of treatment on the true clinical endpoint
 - Surrogate Threshold Effect
 - Minimum treatment effect on the surrogate necessary to predict an effect on the true clinical endpoint

Evidentiary Criteria



- Meta-analysis Considerations
 - Inclusion of more trials increases the statistical rigor of the analysis and may allow for more interrogation of the data to address uncertainties.
 - Inclusion of trials with a range of treatment effects (positive and negative trials) increases the accuracy and precision of trial level surrogacy assessment.
 - When designing a meta-analysis, consideration of MRD timing of assessment, missing data is important.
 - The trial populations and treatments included in the meta-analysis inform future applicability of the surrogate biomarker.



- Collaborative Trials in Neoadjuvant Breast Cancer
 - Conducted a pooled analysis of mature trials that had both pathologic complete response (pCR) and long-term outcome data
 - Objectives
 - Determine the association between pCR and EFS and OS
 - Determine the definition of pCR which best correlated with long-term outcomes
 - Identify breast cancer subtypes in which pCR best correlated with longterm outcome
 - Determine what magnitude of pCR improvement predicts long-term clinical benefit

Cortazar Ann Surg Oncol 2015



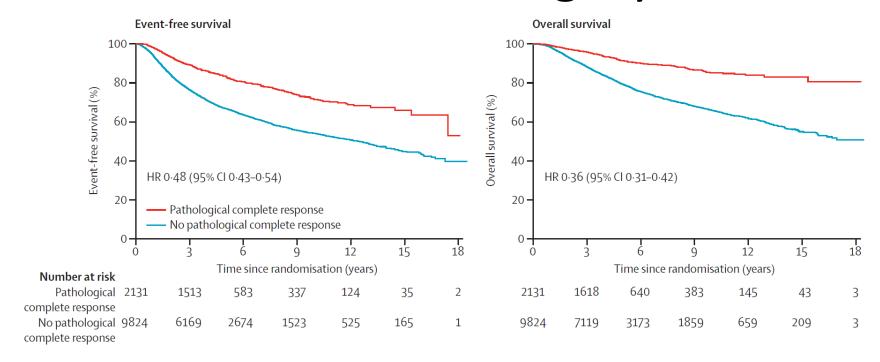


pCR Pooled Analysis Results

pCR definition	Event-free survival HR (95 % CI)	Overall survival HR (95 % CI)
ypT0 ypN0	0.44 (0.39–0.51)	0.36 (0.30-0.44)
ypT0/is ypN0	0.48 (0.43–0.54)	0.36 (0.31–0.42)
ypT0/is	0.60 (0.55-0.66)	0.51 (0.45–0.58)

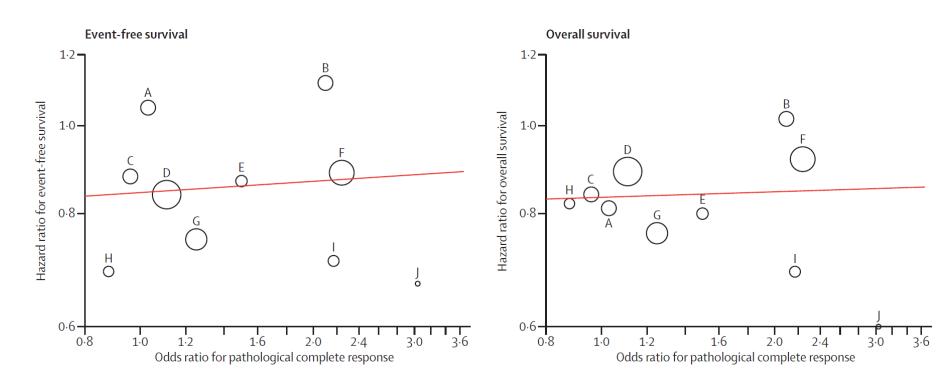


Individual-Level Surrogacy





Trial-Level Surrogacy



R² 0.03 (95%CI:0.00,0.25)

R² 0.24 (95%CI:0.00,0.70)



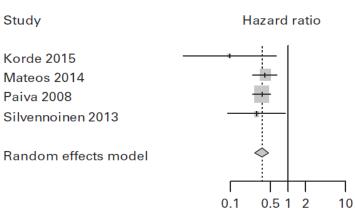
- CTNeoBC Summary
 - No pCR association with long-term outcomes (EFS and OS) at a trial level, only on an individual level
 - A standard definition that includes assessment of the nodes (ypT0ypN0 or ypT0/isypN0) should be used in future trials
 - Magnitude of pCR improvement that predicts longterm clinical benefit could not be established
 - Possibly due to heterogeneity of population, low pCR rates, lack of targeted therapies

Cortazar Lancet 2014

MRD in MM Meta-analyses

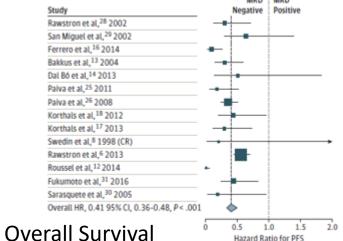


Progression-Free Survival

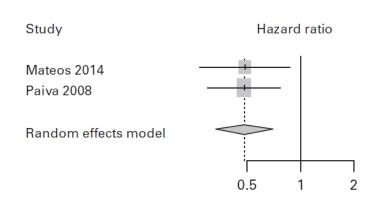


HR	95%-CI
0.10	[0.02; 0.61]
0.40	[0.25; 0.65]
0.35	[0.25; 0.50]
0.28	[0.09; 0.89]
0.35	[0.27; 0.46]

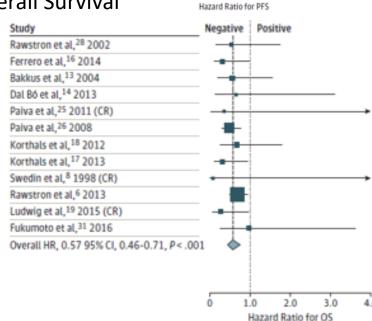
Progression-Free Survival



Overall Survival



95%-CI
[0.27; 0.88 [0.30; 0.77
[0.33; 0.70



Landgren BMT 2016 Munshi Jama Oncol 2016

MRD in MM Meta-analyses



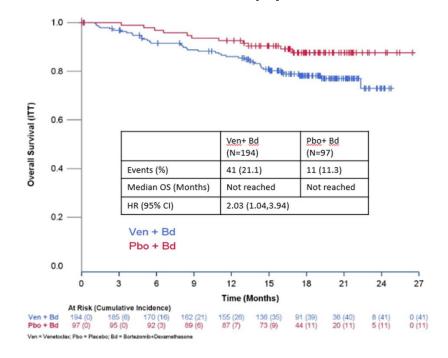
- Remaining Questions
 - Does MRD in MM have trial level surrogacy using individual patient level data?
 - What is the threshold that best correlates with clinical benefit?
 - What is the appropriate timing of assessment?
 - Does Sustained MRD better correlate with long-term outcomes?
 - Should MRD be assessed in those only in CR, VGPR, PR?

BELLINI Trial: A Cautionary Tale



 Phase 3, double-blind, randomized, placebo-controlled trial of bortezomib and dexamethasone with or without venetoclax in patients with relapsed/refractory, multiple myeloma who had received 1-3 prior lines of therapy

	Venetoclax Arm	Placebo Arm
ORR	82.0% (75.8, 87.1)	68.0% (57.8, 77.1)
MRD negativity rate (10 ⁻⁵)	13.4% (8.9, 19.0)	1.0% (0.0, 5.6)
Median PFS (mos) (95% CI)	22.4 (15.3, NR)	11.5 (9.6, 15.0)
Hazard Ratio (95% CI)	0.63 (0.44, 0.90)	



BELLINI Trial: A Cautionary Tale



Table. Progression-Free Survival, Overall Su	irvivai, and Cimical Response Rates.
--	--------------------------------------

PFS HR (95% CI)		OS HR (95% CI)		
All patients (N=291)	0.630 (0.443-0.897)	2.027 (1.042-3.945)		
High-risk cytogenetics ^a (N=49)	1.206 (0.577-2.520)	NE		
Standard-risk cytogenetics ^b (N=213)	0.544 (0.354-0.837)	1.505 (0.727-3.115)		
t(11;14) (N=35)	0.110 (0.022-0.560)	0.343 (0.031-3.842)		
BCL-2 high (N=140)	0.502 (0.294-0.856)	1.446 (0.568-3.678)		
BCL-2 low (N=37)	1.387 (0.431-4.468)	NE		

	All pa	All patients		t(11;14)		BCL-2 high	
	Ven (N=194)	Pbo (N=97)	Ven (N=20)	Pbo (N=15)	Ven (N=93)	Pbo (N=47)	
ORR	82%	68%	90%	47%	86%	68%	
≥CR	26%	5%	45%	7%	32%	4%	
≥VGPR	59%	36%	70%	27%	68%	34%	
uMRD	13%	1%	25%	0%	17%	2%	

CI, confidence interval; CR, complete response; HR, hazard ratio; NE, not estimable due to no events in placebo; ORR, overall response rate; OS, overall survival; Pbo, placebo; PFS, progression-free survival; uMRD, undetectable minimal residual disease (10-5); VGPR, very good or better partial response.

a. t(4;14), t(14;16), or del(17p)

b. No high-risk cytogenetics

Kumar. EHA Library. 2019 273254; LB2601

BELLINI Trial: A Cautionary Tale



- Concerning OS results
 - Need evaluation of endpoints that can be assessed at Early timepoints <u>and</u> Late timepoints that provide definitive evidence of clinical benefit
 - Bellini Trial showed divergent OS and ORR, PFS, MRD results
 - Additional Information is needed on MRD as an endpoint in MM

MRD Today and Future Considerations



- MRD results used to support accelerated approval in ALL
 - Blinatumomab approval in MRD-positive B-cell Precursor ALL
 - Accelerated approval based on MRD response rate and hematological relapse-free survival
- MRD results have been included in Prescribing Information in CLL
 - Venetoclax, Obinutuzumab
- MRD results have been included in the Prescribing Information in MM
 - Daratumumab, Abecma
 - Currently recommended as a secondary endpoint
- Ongoing efforts in various diseases to formally evaluate MRD

Conclusions



- Validated Endpoints are needed for Regular Approval
- pCR and MRD are not validated surrogate endpoints
- Existing uncertainty and remaining questions regarding these endpoints for regulatory purposes
- MRD, pCR and other biomarker assessments in clinical trials should be discussed with the Agency
- FDA is committed to working with the community on the development of biomarkers.

Thanks...



- Laleh Amiri- Kordestani
- Marc Theoret
- Julia Beaver



Session 3: Clinical Validation and Regulatory Acceptance of Biomarkers as Surrogate Endpoints

Moderator:

Norman Stockbridge, US Food and Drug Administration

Panelists:

- Steve Ryder, Rallybio Inc.
- Henrik Zetterberg, University of Gothenburg
- Lesley Inker, Tufts University
- Nicole Gormley, US Food and Drug Administration
- Aliza Thompson, US Food and Drug Administration
- Jeff Allen, Friends of Cancer Research

Session 3: Clinical Validation and Regulatory Acceptance of Biomarkers as Surrogate Endpoints

Discussion Questions:

- 1. What are the challenges associated with validating biomarkers, and what approaches may support efficient biomarker validation?
- 2. What characteristics and processes are shared by programs with a strong track record in evaluating candidate surrogates?
- 3. What more can be done to assist developers in validating candidate surrogates?
- 4. How can early involvement and communication with regulatory agencies support biomarker validation?

Break

We will be back momentarily.

The next panel will begin at 2:05 p.m. (U.S. Eastern Time)

Session 4: Beyond Surrogate Endpoints: Other Ways Translational Science Can Support Drug Development

2:05 pm - 3:30 pm EST

Leslie Gordon

Medical Director and Co-Founder

Progeria Research Foundation

Hutchinson-Gilford Progeria Syndrome Case Study

Beyond Surrogate Endpoints: Other Ways Translational Science Can Support Drug Development

> Translational Science in Drug Development: Surrogate Endpoints, Biomarkers, and More May 24, 25, 2022 Duke Margolis Center for Health Policy

Leslie B. Gordon, MD, PhD

The Progeria Research Foundation
Hasbro Children's Hospital & Alpert Medical School of Brown University
Boston Children's Hospital Boston and Harvard Medical School

Faculty Disclosures, Leslie B. Gordon, MD, PhD

 Volunteer Medical Director, The Progeria Research Foundation

 In-kind donations: Receive medication for Progeria clinical trials from 3 drug companies (names not included at FDA's request) at no cost

 Sources of Funding for Research: The Progeria Research Foundation; FDA



Progeria: An Ultrarare Fatal Premature Aging Disease





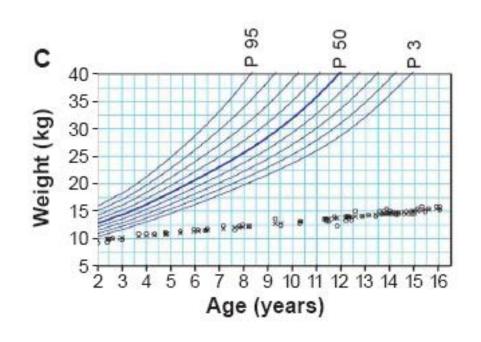


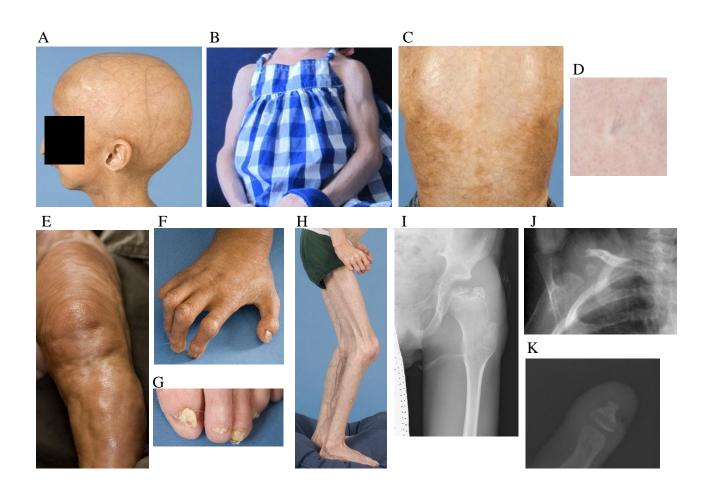


- Segmental "Premature Aging"
- Prevalence 1/20 million
- 19 children in US
- ~400 children worldwide

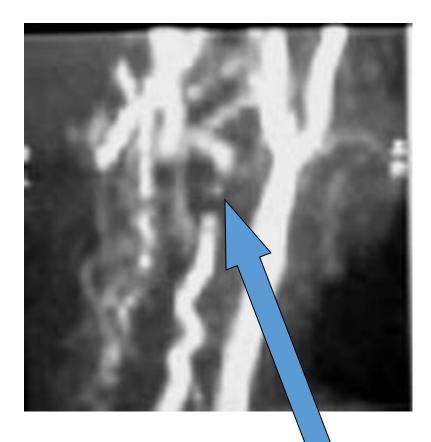
- Autosomal Dominant
- Lifespan Ave 14.5 yrs.
- Death due to premature atherosclerosis

Clinical Signs of HGPS





CV and Neurovascular Disease

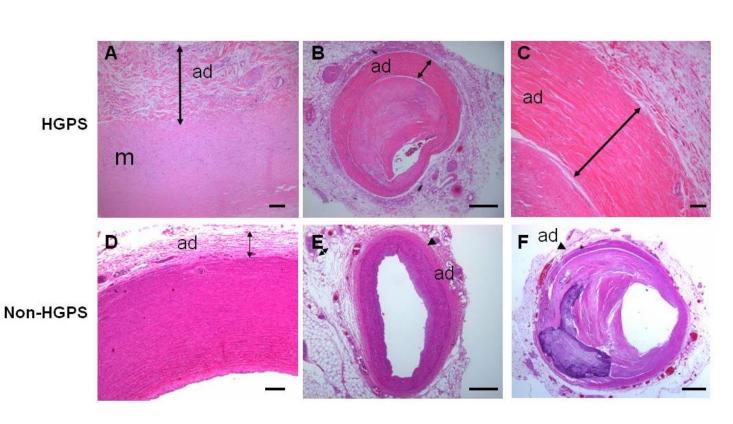


- Global, Progressive
- Heart Failure, Strokes

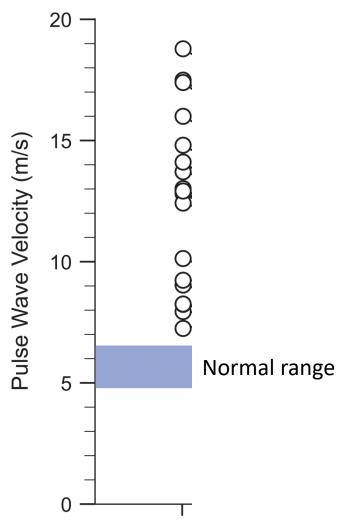
MRI 5 year old with carotid obstruction

Human HGPS Vascular Disease

- Calcific Plaques
- Thick Fibrotic Adventitia
- Medial Cell Death with Extracellular Matrix Deposition



Assays Demonstrating Extremely Stiff Vessels In HGPS



Control HGPS Pre-therapy

Echodense Carotid Artery Wall

Avg. PWV 3.5 x normal (40-60 y.o.)

2003 Gene Discovery

letters to nature

Recurrent *de novo* point mutations in lamin A cause Hutchinson–Gilford progeria syndrome

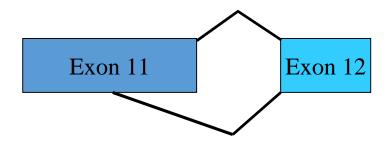
Maria Eriksson*, W. Ted Brown†, Leslie B. Gordon‡, Michael W. Glynn§, Joel Singer||, Laura Scott||, Michael R. Erdos*, Christiane M. Robbins*, Tracy Y. Moses*, Peter Berglund¶, Amalia Dutra*, Evgenia Pak*, Sandra Durkin§, Antonei B. Csoka#, Michael Boehnke||, Thomas W. Glover§ & Francis S. Collins*



We were catapulted into a new phase...

HGPS is Caused by a Single Base Silent Mutation in the *LMNA* Gene (c.1824 C>T, G608G)

Mutation Optimizes LMNA Internal Splice Site



Mutant Splicing

150 bp deletion (50 aa)

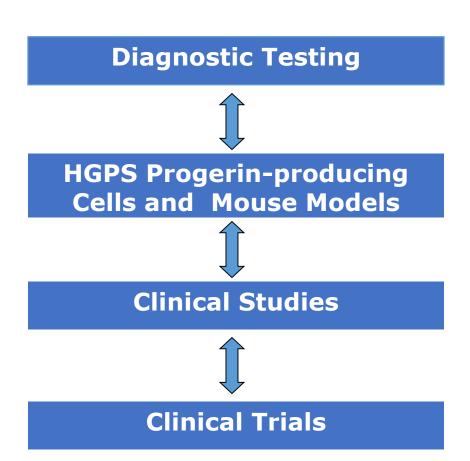
"progerin"

Lamin A: Inner Nuclear Membrane Protein

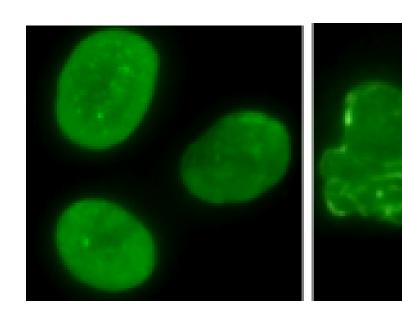
- Lines the inner nuclear membrane-Scaffolding
- Binds chromatin to effect transcription
- Structural and signaling effects
- Expressed by Differentiated Cell Types
- Undergoes post-translational processing that is defective in HGPS due to 50 aa deletion
- Thus, progerin is short, permanently farnesylated and toxic to cells

Biology Leads The Way Towards Treatment Trials





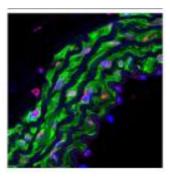
Progerin Causes Nuclear Blebbing In Cultured Cells % Blebbed Cells Increases with Passage Number



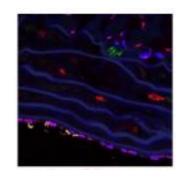
Normal Fibroblast Nuclei Progeria Fibroblast Nuclei

Human Progerin-Producing Mouse Models Created

- Human BAC Transgenic G608G Mouse Model (Varga et al (Collins) PNAS 2006)
 - Mice Are Small,
 - Develop CVD but not plaques,
 - Die Early, cause of death unknown
 - Human Progerin Produced
- Mouse Knock-in G609G Mouse Model (Osorio et al (Lopez-Otin) Sci Transl Med 2011)
 - Mouse Progerin Produced
 - Mice Are Small
 - Develop CVD but not plaques,
 - Die Early, cause of death unknown
- Additional endothelial-specific and VSMC-specific mouse models have also been developed

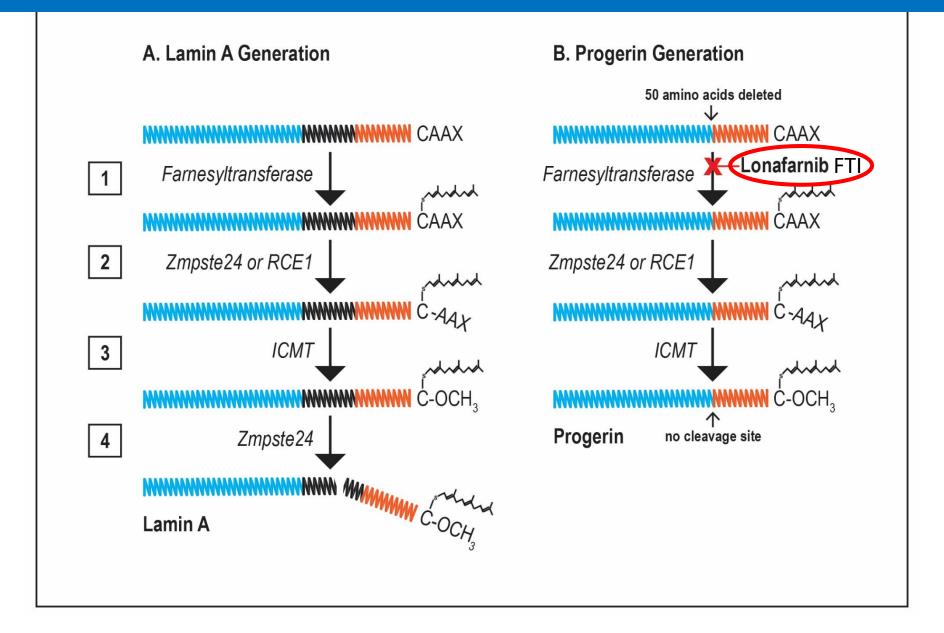


Wild Type Aorta

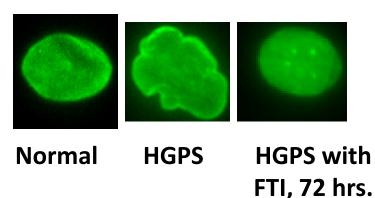


HGPS Aorta

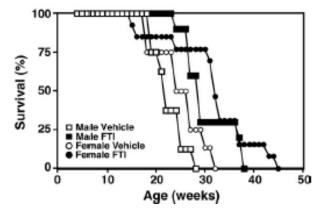
Biology Leads Us To Potential Treatment



Farnesyltransferase Inhibition as Treatment (not all using the FTI in our trials)



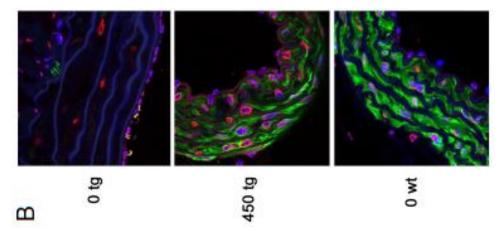
FTI Lonafarnib Normalized human HGPS Fibroblast Nuclear Shape



FTI ABT-100 Improved Disease *in Zmpste24 Deficient Mouse Model*, Including lifespan

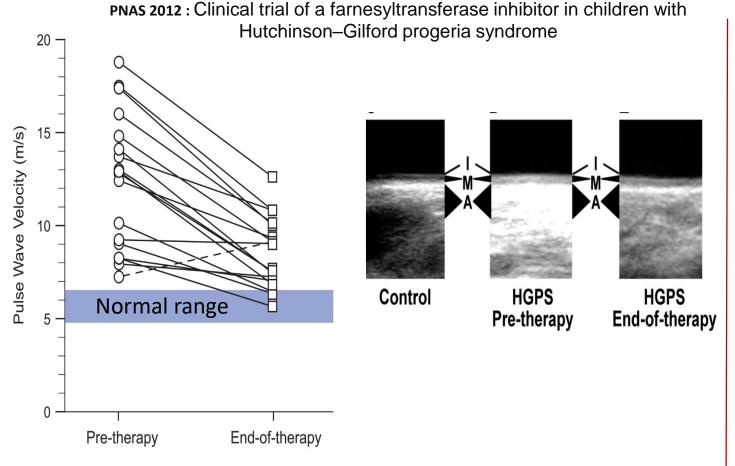
When treated with FTI tipifarnib after birth, Cardiovascular disease did not develop

When allowed to develop cardiovascular disease for 9 months, then treated with FTI tipifarnib, Normal vasculature detected



Capell et al 2005; Glynn et al, 2005; Toth et al, 2005; Fong et al, 2006

Improvements With Lonafarnib Treatment in Children: Changes in the Arteries and Extended Survival



JAMA | Preliminary Communication 2018 Association of Lonafarnib Treatment vs No Treatment With Mortality Rate in Patients With Hutchinson-Gilford Progeria Syndrome 0.9 8.0 0.7 1/27 deaths vs. Survival Probability 0.6 9/27 deaths 0.5 -88% reduced risk of death during the 2 0.4 vears of treatment 0.3 0.2 -Current unpublished estimate of average 0.1 lifespan extension is 4.3 years 1.5 2.0 2.5 0.5 Time Since Start of Follow-up (years) Treatment Group Treated

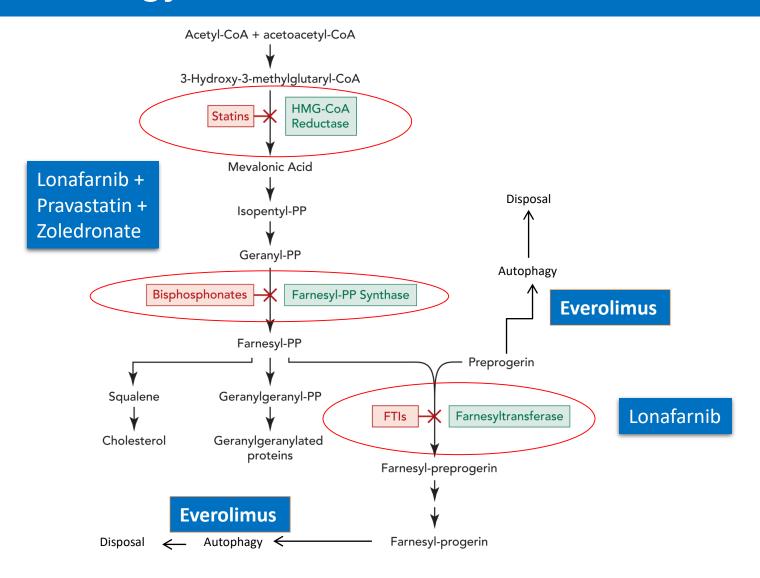
Survival

Carotid-Femoral Pulse Wave Velocity

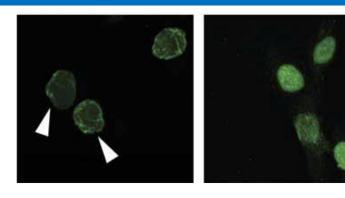
Carotid Artery Echodensity

Lonafarnib (Zokinvy) is our first FDA approved drug for Progeria

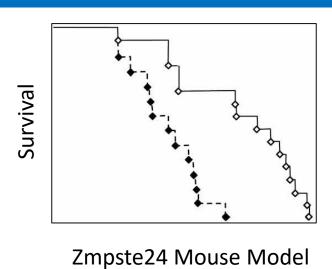
Biology Leads Us To Clinical Trials



Statin plus Bisphosphonate Farnesyl Formation Inhibition



Untreated Treated Zmpste24 Mouse Fibroblasts





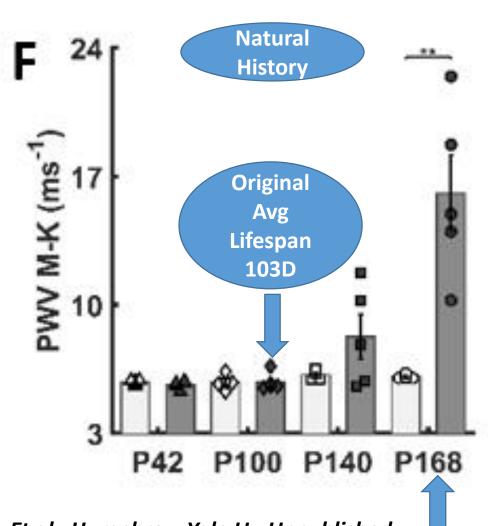
- WT Untreated Treated
- Zmpte24 Mutations do result in progeroid disease in humans, but not identical to HGPS and not progerin-producing (abnormal prelamin A causes disease)
- This model is not progerin-producing, no CVD
- Zmpste24 mice have spontaneous fracture and neuro. deficits, unlike HGPS
- Human Clinical Trial of HGPS in Combination with Lonafarnib, Pravastatin and Zoledronic acid Showed No Benefit Over and Above Lonafarnib Monotherapy
- A great animal model, but not optimal for drug development in HGPS

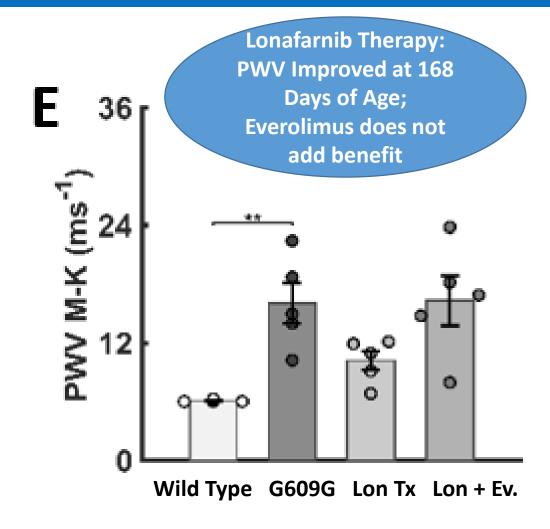
Animal Husbandry: G609G Homozygote:



- soft gel-based chow on the floor of cage +
- introduction of a caretaker mouse in each cage
- original 50% survival at 103 days (Osorio et al., 2011)
- new extended the mean lifespan = 168 days
- allowed the cardiovascular phenotype to worsen similar to that observed clinically in patients.
- cardiovascular function progressed to extreme stiffening and diffuse vascular calcification.

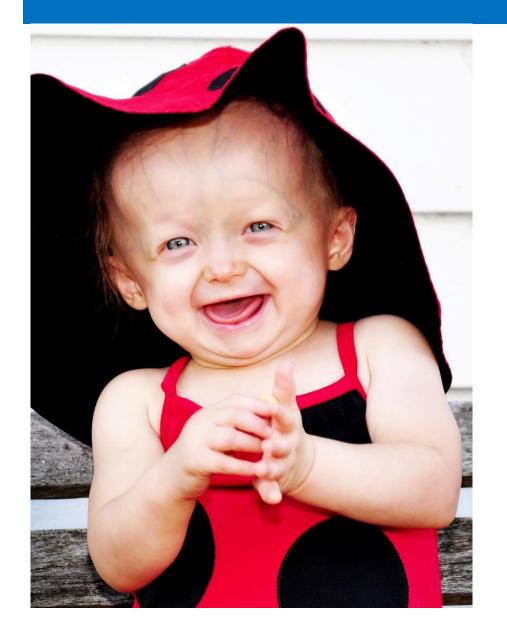
Extended Mouse Lifespan Potentiates Overlap with Human Cardiovascular Disease





Murtada Et al...Humphrey; Yale U.; Unpublished

Getting The Word Out for Maximal Success



Collection and Distribution of Best Practices and Guidance for Basic Scientists

- New Publications
- Investigator Surveys
- Email Blitz's with new information
- Resource Center
- Posters at Scientific Meetings

Centralizing Disease-Specific Animal Testing To Optimize Outcomes and Comparability

Assess Candidate Intervention (i.e. supporting in vitro data and biologic plausibility

Choose Most Appropriate HGPS Mouse Model

Implement Controlled Intervention Study

Survival Study with Pathology

Gating For Human Trial

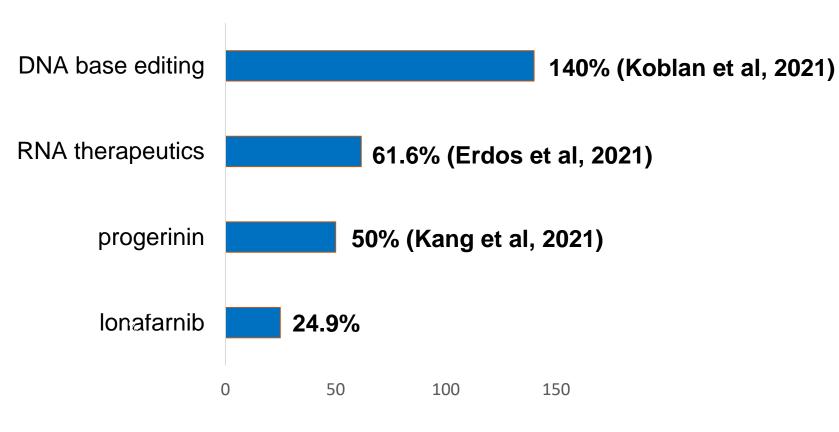
Centralized Serial
Phenotypic
Assessment
(weight, progerin
levels, etc)

Send Mice and/or Samples to Investigator for Specialized Analyses

Potential New Treatments' effects on Progeria Mouse Model Survival*



% Increase in Progeria mouse lifespan compared to controls



^{*} Note that mouse models in use were not the same across all studies

Determination and Collaboration

Finding...

Diagnosing...

Studying...

Treating...





Together, we W/LL find the cure! www.progeriaresearch.org

Estelle Marrer-Berger

Senior Translational Safety Leader Roche



Optimizing early clinical investigations by increasing the predictive value of non-clinical activities

Estelle Marrer-Berger, Antje Walz, and Imein Bousnina

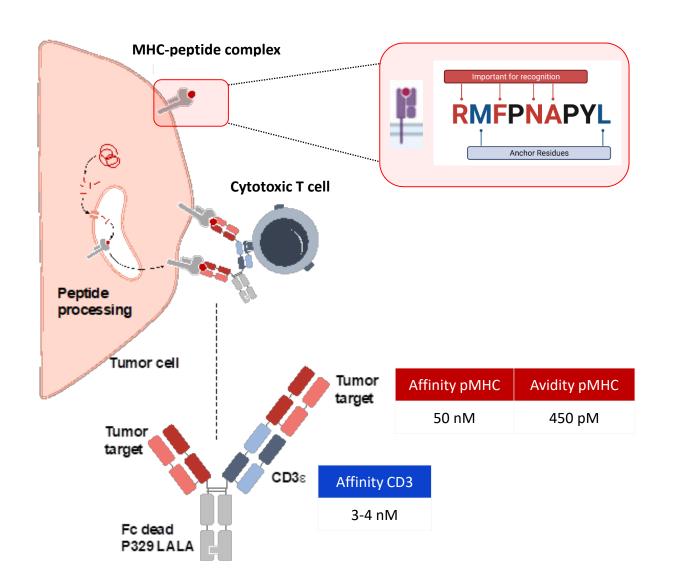
Duke-Margolis Center for Health Policy / May 24-25, 2022



Roche pRED

Targeting intracellular Wilms tumor 1 in AML with a TCR-like T-cell bispecific antibody

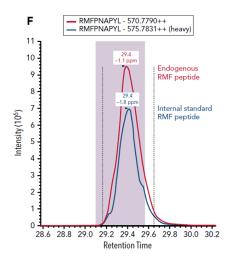




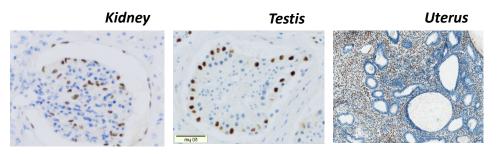
 WT1 oncoprotein is an intracellular, transcription factor, overexpressed in leukemias (AML, ALL) and solid cancers (ovarian cancer and mesothelioma)

Quantification of the RMF peptide on AML blasts

Augsberger et al., Blood, 2021



 In adults, WT1 expression is restricted to a few tissues: (kidney podocytes, Sertoli and granulosa cells in the testes and ovaries, few mesothelial cells and 1% of bone marrow cells)



A human/patient-centric non-clinical approach to bring WT1 TCB to patients?



Reduce and manage the «Unknown»



A

F

E

- Lack of cross-reactive TOX animal species and the standard non-clinical toolbox not applicable
- Increased risks for offtarget / off-tumor crossreactivity



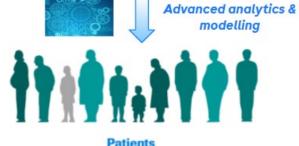
Increase the predictive value: predicting from human to human

Our innovative patient-centric approach



Healthy donors & Patients





K / P D / S

A

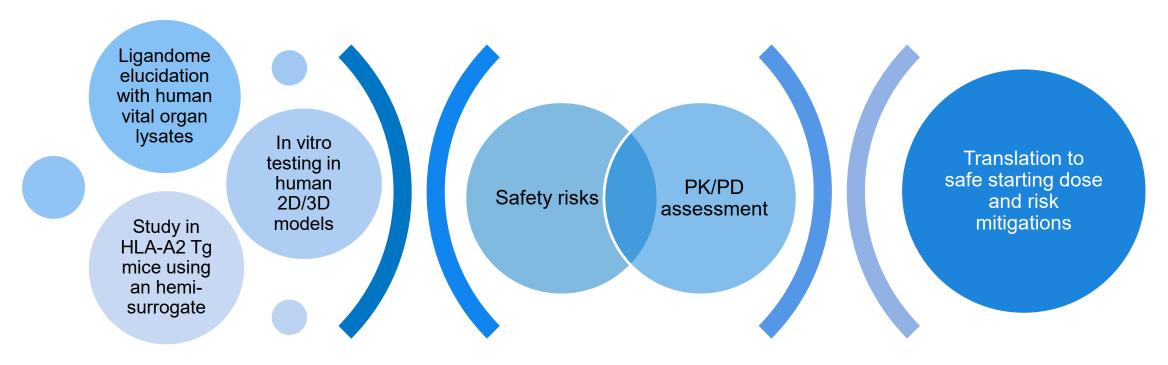
F

T

Y



Non clinical strategy for Entry into Human based on NAMs In vitro / ex vivo derived therapeutic index, starting dose, and PAD



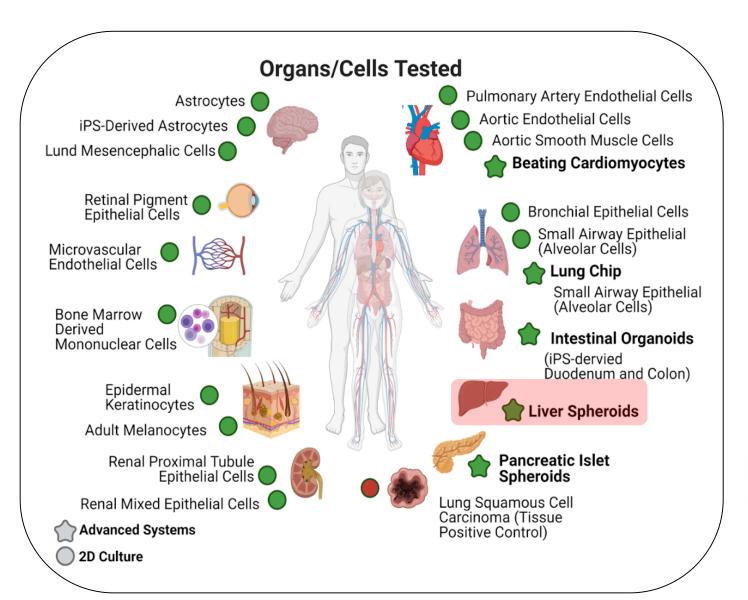
Non-clinical safety strategy combining new «state of the art» activities to potentiate risk identification in the absence of a cross-reactive species

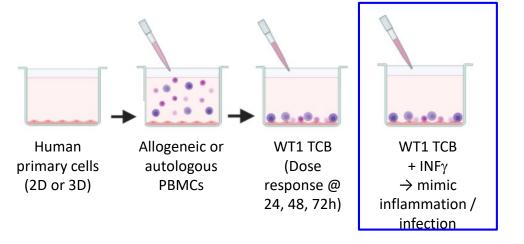
Integration of qualitative and quantitative assessments to define a **therapeutic index**

Define **starting dose** and **risk management plan**

Risk identification using human 2D / 3D in vitro systems













Supernatant

Microscopy

Electrophysiology

Cell Death

(A) LDH

B Caspase 3/7

Granzyme B TNF-a

Cytokines

INF-a IFN-q

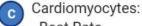
IL-8 IL-10

IL-2

IL-6

Physiological Parameters



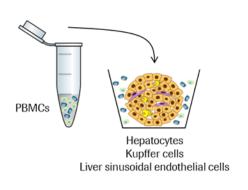


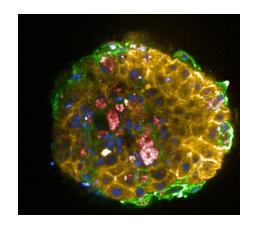
- Beat Rate

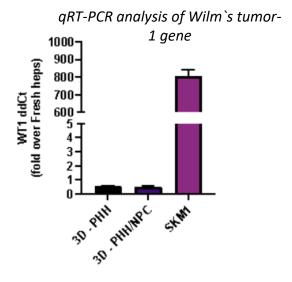
- Base Impedance

WT1 TCB consistently induced minimal (?) lysis in liver spheroids (7 donors) co-cultured with allogenic PBMCs (3 donors)

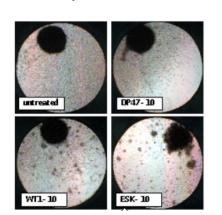


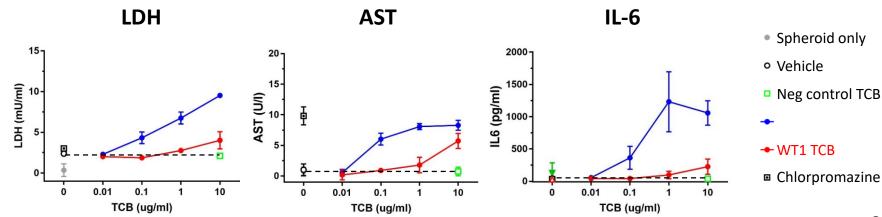




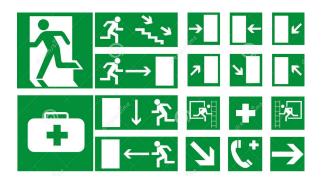


Bright field pictures of liver spheroids in co-culture experiment 72 hours after treatment





And now what?



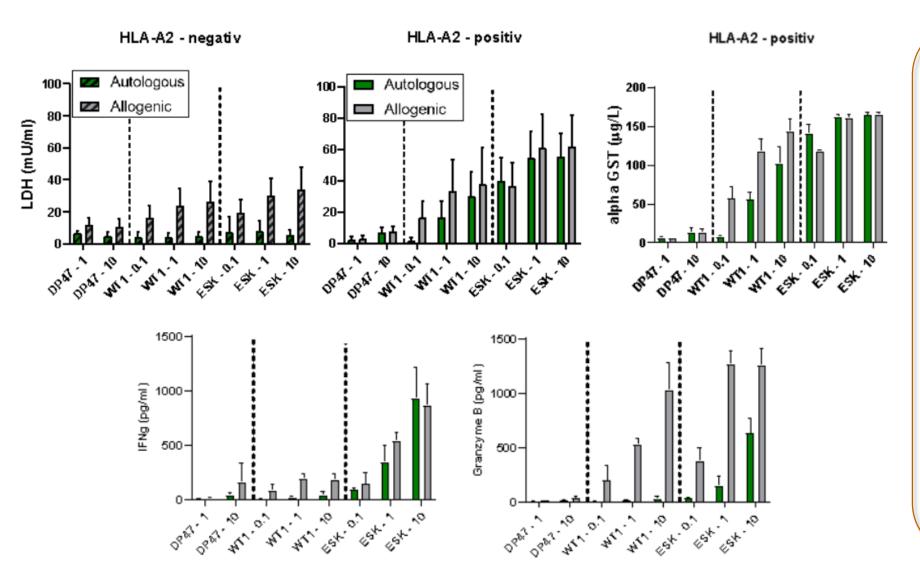


- The signal needs to be further assessed, qualitatively and quantitatively
- The in-vitro effect needs to be «translated» to a human body
- A threshold of significance needs to be established and be related to a drug concentration/exposure
- A therapeutic index needs to be defined
- Causality? Exacerbating contexts (pathologies, medications..)?
- > Exclusion/Inclusion criteria, monitoring and mitigation need to be defined





Safety assessment based on dynamic in vitro killing assays using human liver spheroids (3D): *Mild but consistent signal at* $1 \mu g/ml$



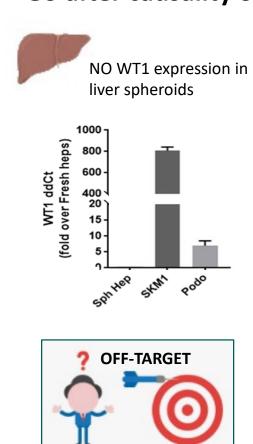
Conclusions

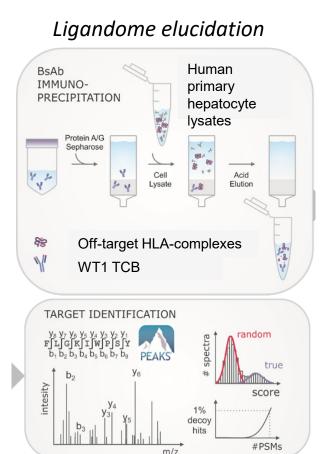
- The signal is **consistent** across donors and endpoints monitored
- The significance threshold was conservatively defined at 1 µg/mL based on the increased LDH/caspase3/7, cytokines, and AST observed in the allogenic co-cultures (worst-case scenario)
- Alloreactivity amplifies the signal, though, compared to the negative control DP47, 1 µg/mL triggers a minimal effect
- Causality? Do we have a therapeutic window?



Causality of the signal observed: a CYP8B1 epitope? WT1 TCB interactome elucidation to identify potential off-targets

Go after causality of the signal: technical, biological artefact or REALITY?



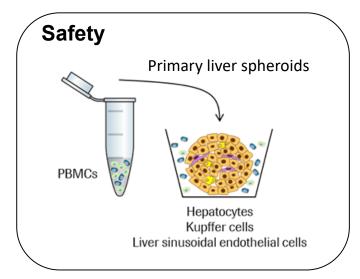


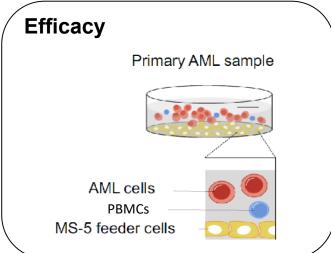
Synapse stability evaluation P-CD3ζ no peptide WT1 CP8B1 MAGE-A4 Stable synapse formation only obtained with the targeted RMF peptide Confirmation that the safety threshold at $1 \mu g/mL$ is

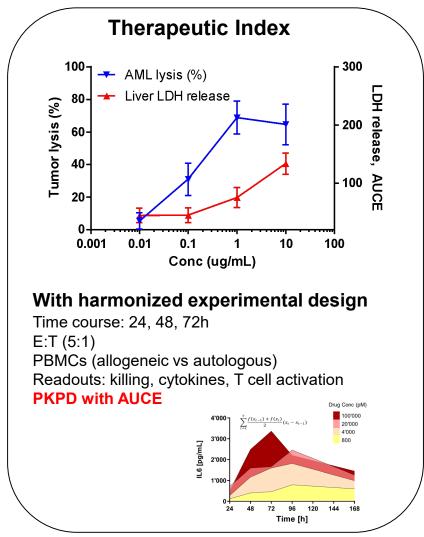
conservatively defined



Deriving a TI from an harmonized in vitro / ex vivo dynamic testing using diseased and healthy human systems

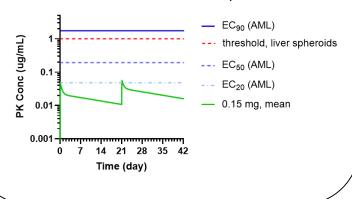






Translational PKPD strategy

- Patient-centric MABEL starting dose
- Safety margin prediction
- Prediction of efficacious exposure



Augsberger C, et al. Targeting intracellular WT1 in AML with a novel RMF-peptide-MHC specific T-cell bispecific antibody. Blood 2021

Patient-centric starting dose prediction

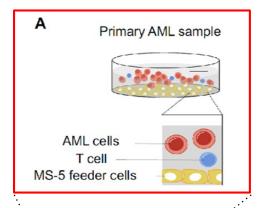


for patients

relevance

Increased





Patient-centric

Class	sical
-------	-------

	ExVivo-AML	OCI-AML3	SKM1
E:T	5/1	5/1	5/1
EC50 (ug/mL) median	0.193	0.184	0.0059
Min	0.0310	0.0782	0.00079
Max	0.406	2.36	0.011
N	7	10	7

Higher starting dose: 5 μg (standard MABEL) to 150 μg (patient-centric MABEL)

Classical in vitro MABEL

- Uses the most sensitive tumor cell line, most sensitive readout (T cell activation) to derive a safe starting dose
- Starting dose safe BUT much lower than expected therapeutic dose

Patient centric MABEL

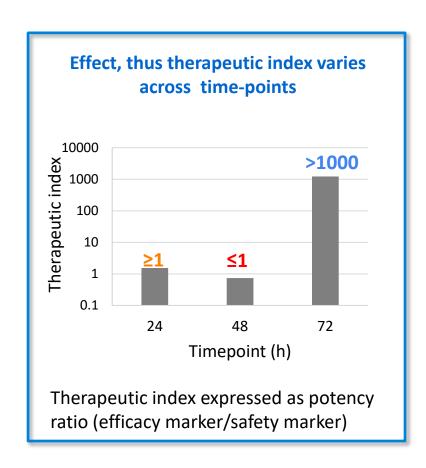
- Efficacy prediction using patient-derived material (ex vivo)
- Safety prediction based on primary healthy and diseases in vitro systems
- Starting dose is close to therapeutic dose and reflects a balanced risk/benefit



Saved **3 additional cohorts** of patients with sub-clinical doses



WHAT WE LEARNT



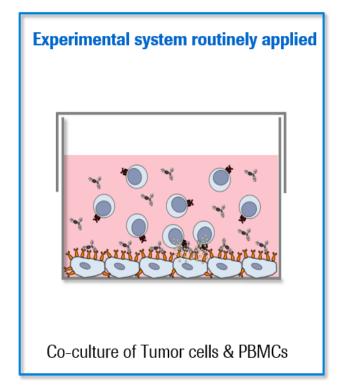


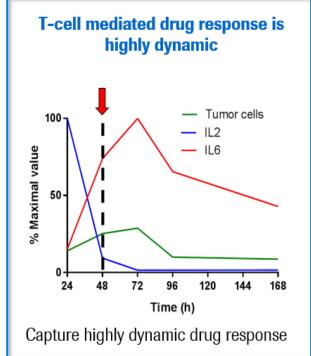
Understand your system and your testing framework (1)

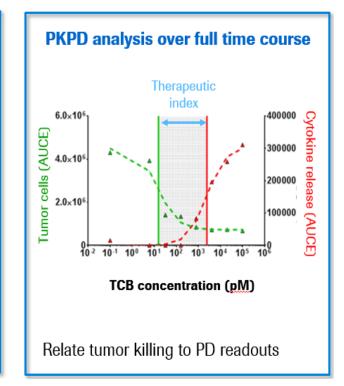
Leverage the systems' strengths, be aware of its limitations

Biological systems are highly dynamic and respond dynamically to stimuli

It is critical to evaluate concentration / effect relationships throughout a time-course, for as long as the system allows







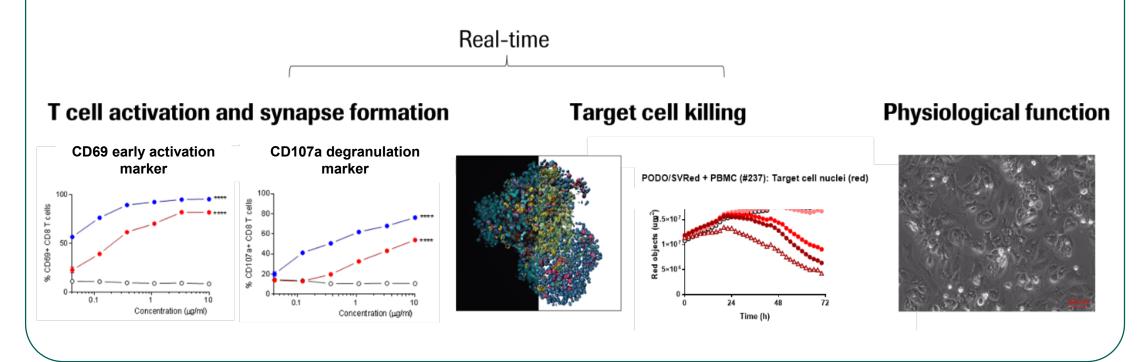


Understand your system and your testing framework (2)

Leverage the systems' strengths, be aware of its limitations

Consistency of the signal

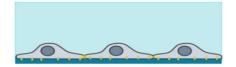
The full cascade of events is observed with WT1 TCB: T cell activation, target cell killing, cytokine and AST increase; controls trigger the expected effects



Patient-derived material enables the balancing act to achieve the highest safe starting dose for CD3 bispecifics

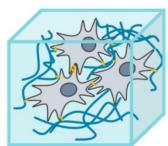






Most **sensitive** readout in most **sensitive** cancer cell line; starting dose targets **EC20**

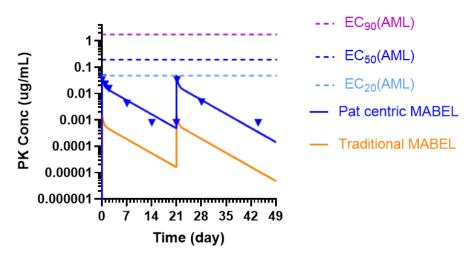
2020



Most relevant readout in most relevant test system: bone marrow from AML patients; starting dose targets EC20

Blinatumomab WT1 TCB Starting dose to efficacious dose 10 000 fold ~100 fold

WT1 TCB PK/PD predictions



- → Patient-centric starting dose (2020) vs
 Standard MABEL starting dose (2013):
 0.150 mg vs 0.005 mg
- → Patient-centric based efficacious dose range prediction: 10 to 15 mg
- → In the clinic, the starting dose was safe & CRs are observed at predicted exposures



WT1 TCB Ph1 Study WP42004 in acute myeloid leukemia ongoing

Broad regulatory approval on a novel non-clinical approach & innovative IMP

- First patient dosed in November 2020; the EiH dose predicted from the patient-derived AML blasts + autologous PBMCs was **SAFE**
- So far, no evidence of liver toxicity up to the dose of 12 mg (Cmax >1 ug/mL)
- The patient-centric framework is of high predictive value for the estimation of the pharmacologically active dose range



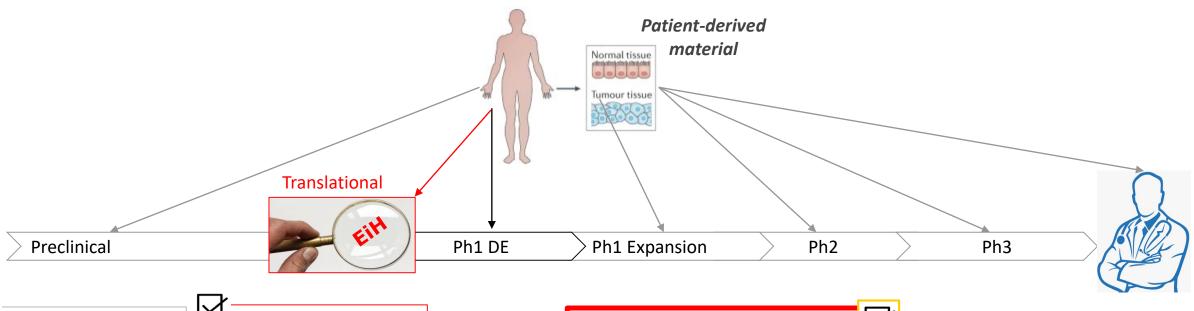


OUTLOOK



Our accomplishments and vision

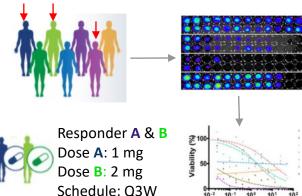
Embrace the uniqueness of the patient to match drug and dose



- Understanding disease mechanisms
 - Validate drug target & MoA
 - Understanding dose / effect relationships
- Efficacy prediction based on tumor tissues
- Safety prediction based on healthy tissues
- → Safe starting dose, close to therapeutic dose →
 Safety assessment; risks and mitigation measures

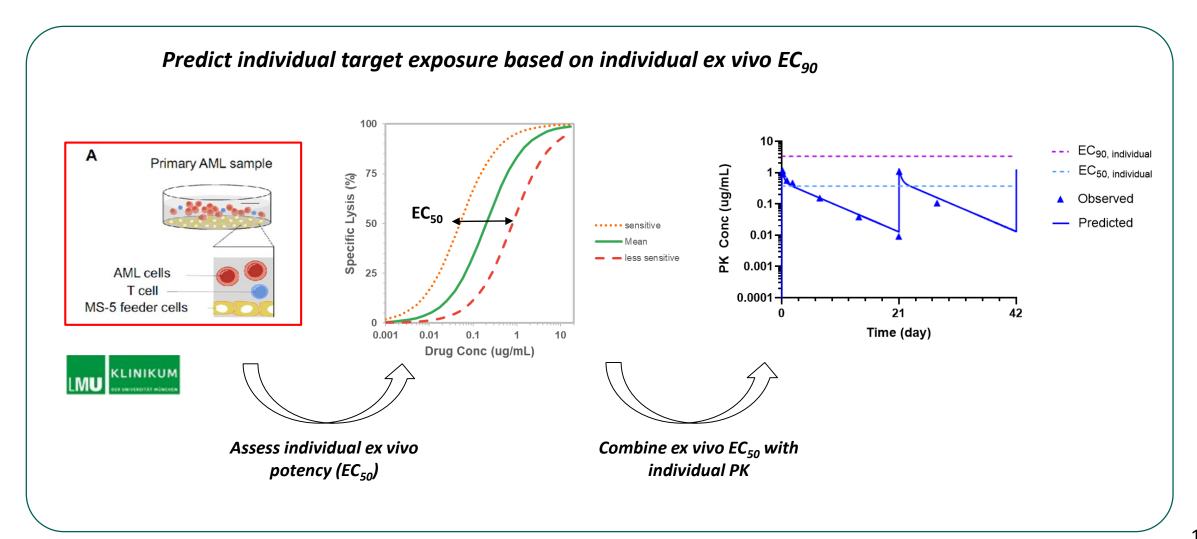


- **Ex-vivo testing** on tumours from patients enrolled in the DE and expansion in parallel to in-vivo testing to:
- → identify responders and predict the efficacious dose
- → verify the predictive value of the EiH data and of power of the model+framework











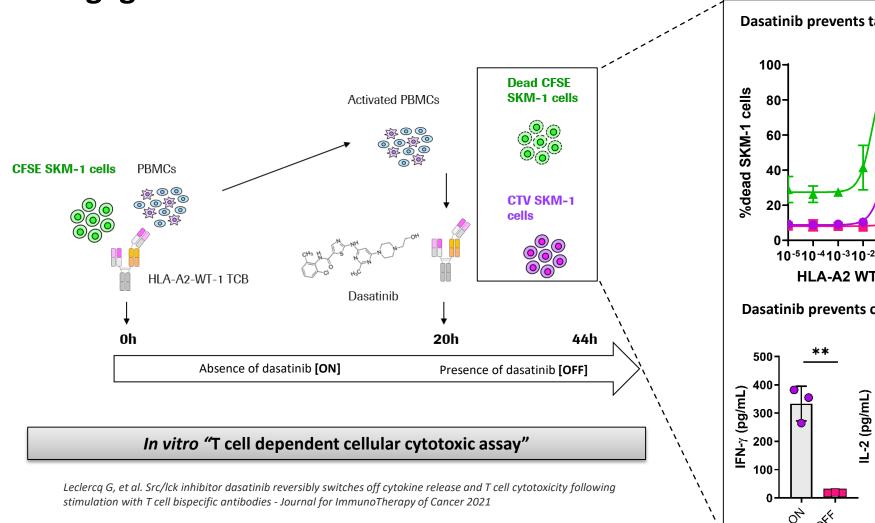


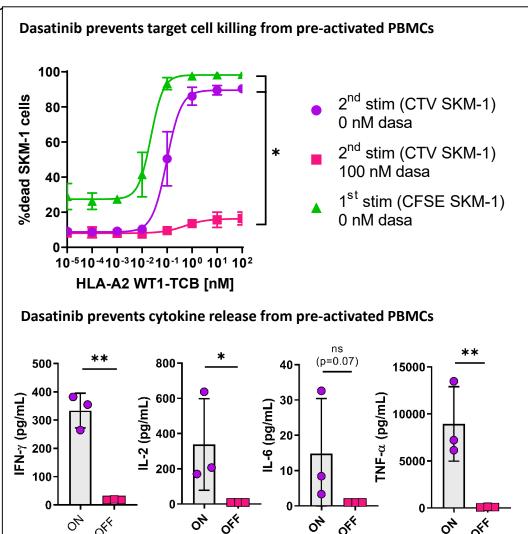


Doing now what patients need next

Safety mitigation for off-tumor mediated killing: Dasatinib "switches off" the CD3 signaling and rapidly neutralizes TCR engagement









Doing now what patients need next

Christine Garnett

Clinical Reviewer

Division of Cardiology and Nephrology

U.S. Food and Drug Administration

Clinical Translational Science: Leveraging Adult Efficacy Data for Pediatrics using Bridging Biomarkers

Christine Garnett, PharmD

Division of Cardiology and Nephrology, OND, CDER, FDA

Disclaimer and Acknowledgements

My presentation reflects my opinion and is not considered official FDA guidance.

I am grateful to Drs. Norman Stockbridge, Lynne Yao and Tom Fleming for their insights and contributions to this presentation.

Pediatric Extrapolation

An approach to providing evidence in support of effective and safe use of drugs in the pediatric population when it can be assumed that the course of the disease and the expected response to a medicinal product would be sufficiently similar in the pediatric and reference (adult or other pediatric) population.

Factors Influencing Extrapolation Approaches

 Common pathophysiology, disease definition, course of disease

Disease Similarity



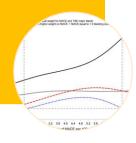
- Similar pharmacology, response endpoints
- Exposure-response relationship

Response Similarity



- Quantity and quality of existing data
- Sources: clinical, nonclinical, real world, registries, experience with similar drugs

Existing Data



Pediatric Extrapolation Approaches

Same disease and response

Similarity of Disease and Response to Treatment

Different disease or response

High confidence

Evidence to Support Similarity

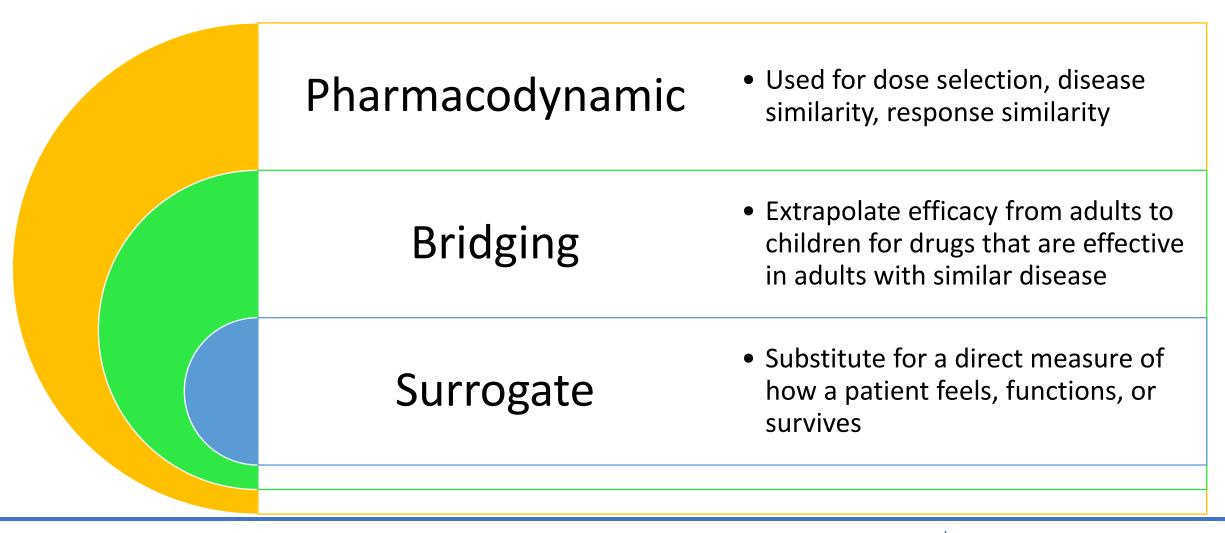
Large gaps in knowledge

Pharmacokinetic and safety study using exposure matching

Controlled trial using bridging biomarkers

*confidence in similarity of disease *less confidence in similarity of exposure-response in children Adequate and well-controlled trial(s) using clinical or surrogate endpoints

Use of Biomarkers in Pediatric Extrapolation



Criteria for Establishing Bridging Biomarker

Disease processes in pediatric and adult settings are closely related biologically

In adults, intervention is safe and has substantial effects on FFS measures and biomarker

Effects on the bridging biomarker capture effects on the principal causal pathway through which the disease process meaningfully influences FFS measures

Intervention does not have important unintended effects on FFS measures that are not captured by the bridging biomarker

In adults, intervention's net effect on FFS measures is consistent with what would be predicted by the level of intervention's effect on the bridging biomarker

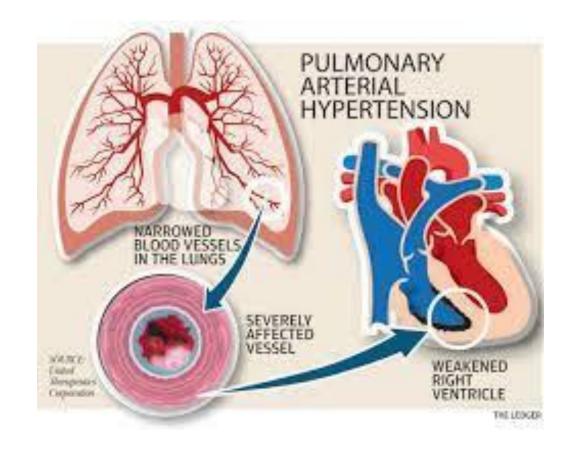
FDA Uses Bridging Analyses of Pediatric Hemodynamic Data to Adult Exercise Capacity in the Approval of Tracleer® (Bosentan) for Pediatric Pulmonary Arterial Hypertension Patients 3 Years of Age and Older

On September 5, 2017, the US Food & Drug Administration (FDA) approved Tracleer (bosentan) for the treatment of pulmonary arterial hypertension (PAH) (WHO Group 1) in pediatric patients aged 3 years and older. This is the first approval of a drug for the treatment of pediatric PAH with idiopathic or congenital PAH to improve pulmonary vascular resistance (PVR), which is expected to result in an improvement in exercise ability. FDA's efficacy evaluation relied on the findings from one of the trials – BREATHE-3, an open-label, uncontrolled study in 19 pediatric patients with PAH aged 3 to 15 years which measured PVR, a cardio-pulmonary hemodynamic variable. FDA conducted analyses using data from previously approved programs in adults that established the relationship between improvements in the 6-minute walk distance (6MWD) and PVR in adults and showed that the relationship was consistent across different approved drug classes (e.g., endothelin receptor antagonist, prostanoids, PDE5 inhibitor, and soluble guanylate cyclase stimulator). The observed reduction in PVR in pediatrics from the BREATHE-3 study was used to bridge the bosentan efficacy findings in adults.

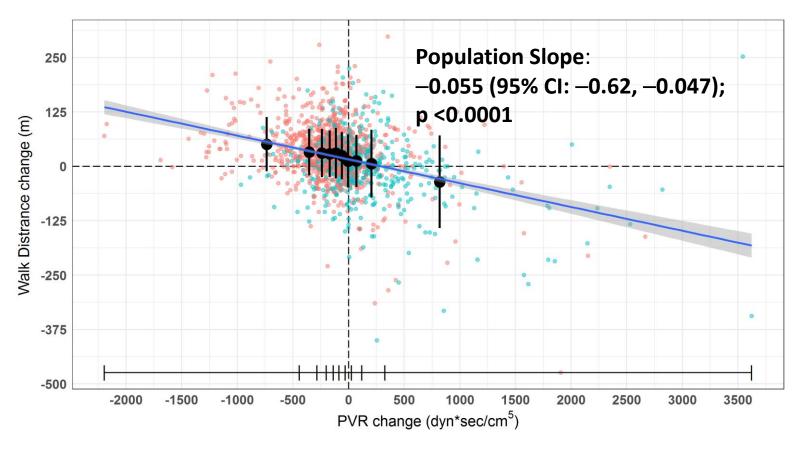
-American College of Clinical Pharmacology, 2017

PVR as Bridging Biomarker for Pulmonary Arterial Hypertension

- Adult and pediatric PAH subtypes of idiopathic, heritable and associated with congenital heart disease are similar in pathophysiology
- PVR is a hemodynamic measure of pulmonary arterial pressure and cardiac output. PVR is on the causal pathway through which the disease process impacts how patients feel, function and survive

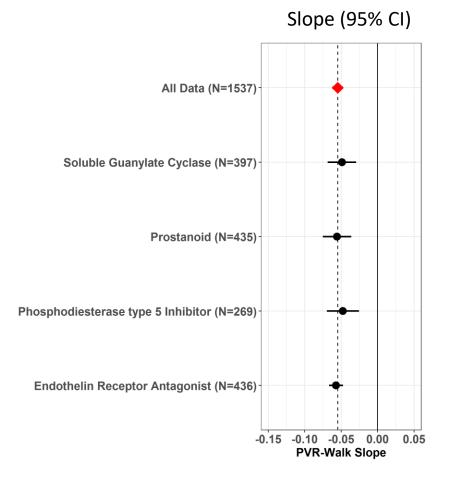


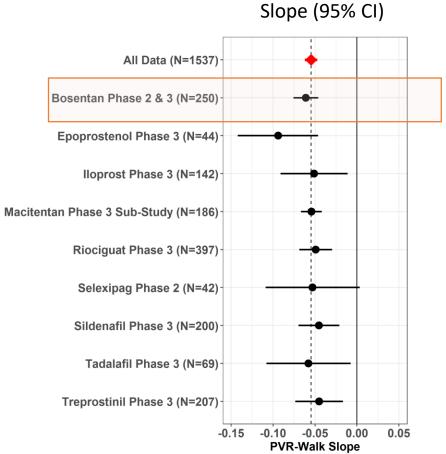
Improvement in \(\Delta 6MWD \) Corresponds to Decrease in \(\Delta PVR \) in Adults



Active Treatment
 Placebo

Consistent Relationship Across Drug Classes and Drugs in Adults

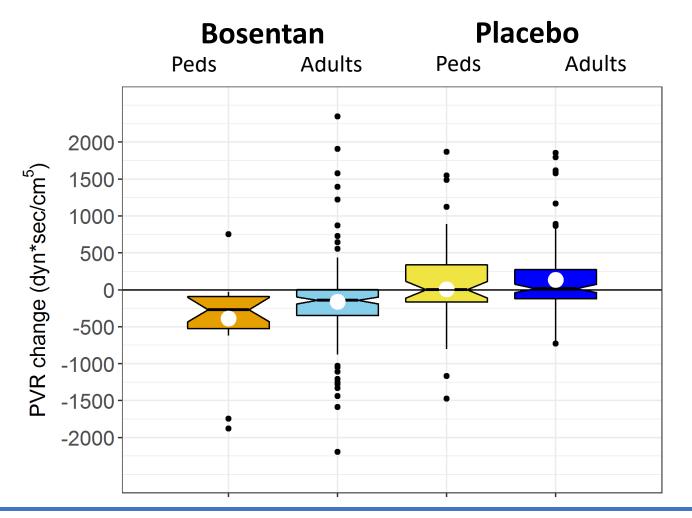




PVR explains the treatment effect on 6 min walk distance in adults

- Bosentan had significant effects on Δ6MWD and ΔPVR:
 - Clinical endpoint, Δ6MWD: +35 m
 - Biomarker, ΔPVR: -250 dyne*sec/cm⁵
- 50% treatment effect on $\Delta 6MWD$ explained by ΔPVR in the data analytical model with and without treatment
- No imbalance of deaths or serious adverse events in both adults and children

Bosentan significantly reduced $\triangle PVR$ in children and adults



Box plots show the mean (white circles), median (notch); 95% CI of median (width of notch); 25th and 75th percentile (width of box); 1.5* interquartile range (whiskers); and outliers (filled circles).

Bosentan Indication

- Tracleer® is indicated for the treatment of pulmonary arterial hypertension (PAH) (WHO Group 1):
 - in adults to improve exercise ability and to decrease clinical worsening. Studies establishing effectiveness included predominantly patients with WHO Functional Class II-IV symptoms and etiologies of idiopathic or heritable PAH (60%), PAH associated with connective tissue diseases (21%), and PAH associated with congenital heart disease with left-to-right shunts (18%).
 - in pediatric patients aged 3 years and older with idiopathic or congenital PAH to improve pulmonary vascular resistance (PVR), which is expected to result in an improvement in exercise ability.

Conclusions

- Use of bridging biomarkers in pediatric extrapolation is distinct from other roles for biomarkers:
 - Not PD marker that is used to support dose selection
 - Not validated surrogate endpoint that can reliably predict the net effect of the intervention on feels, functions, or survives outcomes.
- To establish a bridging biomarker in registrational decision-making, the biomarker should satisfy the 5 core criteria
- Pediatric extrapolation using a bridging biomarker has been used to approve drugs for pediatrics
 - Bosentan for pediatric PAH

References

- ICH E11(R1): Clinical Investigation of Medicinal Products in the Pediatric Population. https://www.fda.gov/regulatory-information/search-fda-guidance-documents/e11r1-addendum-clinical-investigation-medicinal-products-pediatric-population
- ICH E11A: Pediatric Extrapolation Guideline (draft, currently under public consultation)
- ADEPT 7 workshop (September 1, 2021) https://cersi.umd.edu/2017-drugdevelopment-pediatric-heart-failure-workshop
- Fleming TR, DeMets DL. Surrogate end points in clinical trials: are we being misled? Ann Intern Med. 1996;125(7):605-613. doi:10.7326/0003-4819-125-7-199610010-00011
- Clinical Review of NDA020927. TRACLEER (bosentan) dispersible tablets.2017.
 Available from:
 https://www.accessdata.fda.gov/drugsatfda_docs/nda/2017/209279Orig1s000M edR.pdf.

Session 4: Beyond Surrogate Endpoints: Other Ways Translational Science Can Support Drug Development

Moderator:

David Strauss, US Food and Drug Administration

Panelists:

- Leslie Gordon, Brown University
- Estelle Marrer-Berger, Roche
- Christine Garnett, US Food and Drug Administration
- Anthony Durmowicz, Cystic Fibrosis Foundation
- Lynne Yao, US Food and Drug Administration

Session 4: Beyond Surrogate Endpoints: Other Ways Translational Science Can Support Drug Development

Discussion Questions:

- 1. What translational approaches assist in drug development programs beyond use of surrogate endpoints?
- 2. What benefits and challenges exist in using these translational approaches to support drug development?
- 3. How can translational science approaches support regulatory submissions for accelerated approval or traditional approval?
- 4. Is there more that can be done to encourage use of these approaches?

Session 5: Opportunities and Challenges for Incorporation of Translational Science in Clinical Development Programs

3:30 pm - 4:15 pm EST

Session 5: Opportunities and Challenges for Incorporation of Translational Science in Clinical Development Programs

Moderator:

Michael Pacanowski, US Food and Drug Administration

Panelists:

- Jeffrey Siegel, US Food and Drug Administration
- David Reese, Amgen
- Jen Farmer, Friedrich's Ataxia Research Alliance
- Steve Hoffmann, Foundation for the National Institutes of Health

Session 5 : Opportunities and Challenges for Incorporation of Translational Science in Clinical Development Programs

Discussion Questions:

- 1. Reflecting on the meeting, what are key strategies for optimizing the use of surrogate endpoints and other translational approaches for drug development?
- 2. What are the challenges to taking a biomarker from discovery to validation?
- 3. Is there more that can be done to facilitate the process? What mechanisms might be able to increase the use of translational research studies?
- 4. What are key strategies for facilitating collaboration between stakeholders, with the overall goal of improving therapeutic development and approval?
- 5. What are future considerations and next steps for advancing translational science studies and increasing the use and acceptability of these approaches?

Closing Remarks | Day 2

Michael Pacanowski

Director of the Division of Translational and Precision Medicine

U.S. Food and Drug Administration

Thank You!

Contact Us



healthpolicy.duke.edu



Subscribe to our monthly newsletter at dukemargolis@duke.edu



1201 Pennsylvania Avenue, NW, Suite 500 Washington, DC 20004



DC office: 202-621-2800

Durham office: 919-419-2504

Follow Us



DukeMargolis



@DukeMargolis



@DukeMargolis



Duke Margolis