

# Transitioning from pre to post – accelerated approval

*Liver Forum 9*

*July 10<sup>th</sup> 2019, Paris, France*

**Vlad Ratziu, Sorbonne Université, Hôpital Pitié Salpêtrière,  
Paris, France**



# How will conditional approval change the current landscape?

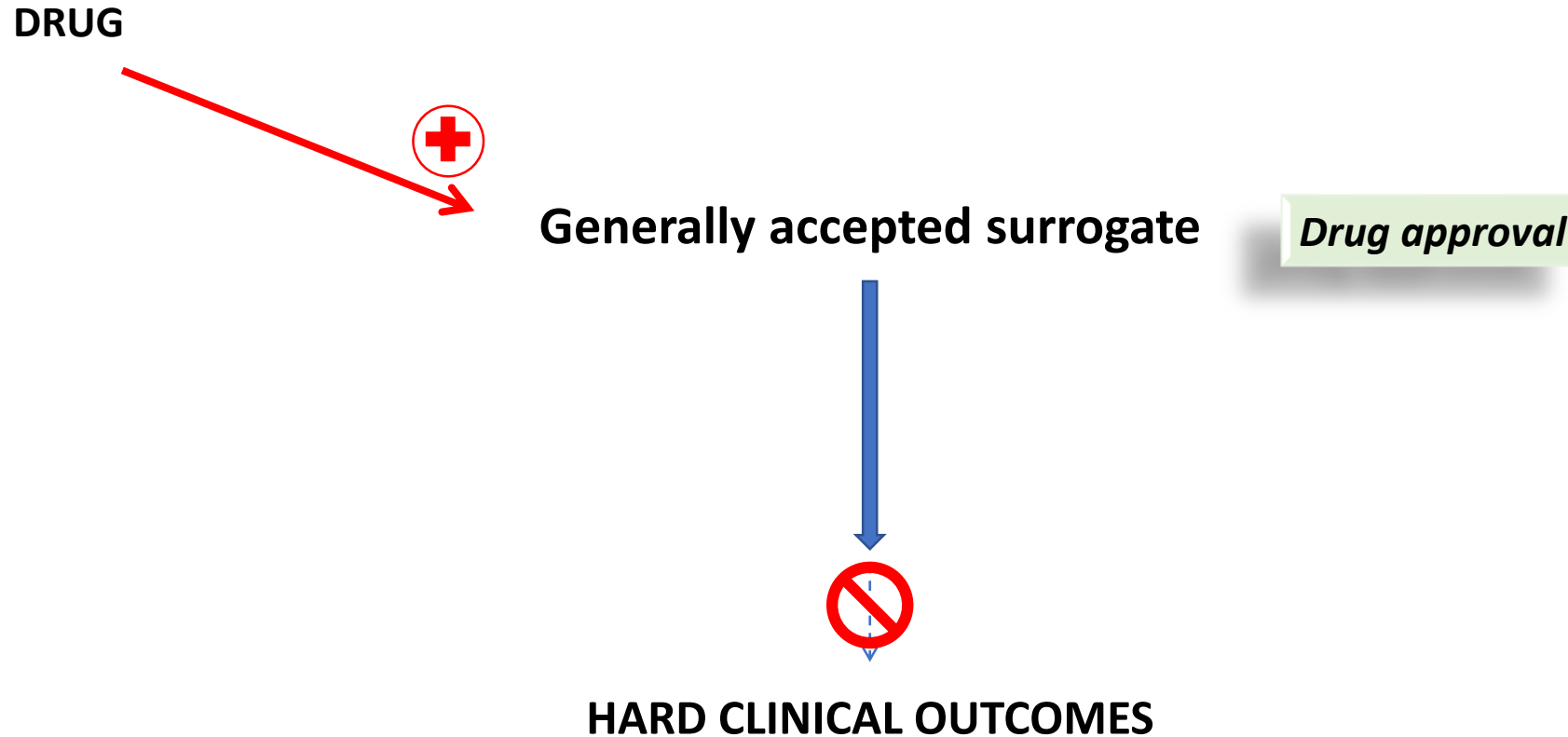
- For trials

- ➔ The demonstration of the predictive value of the likely surrogate

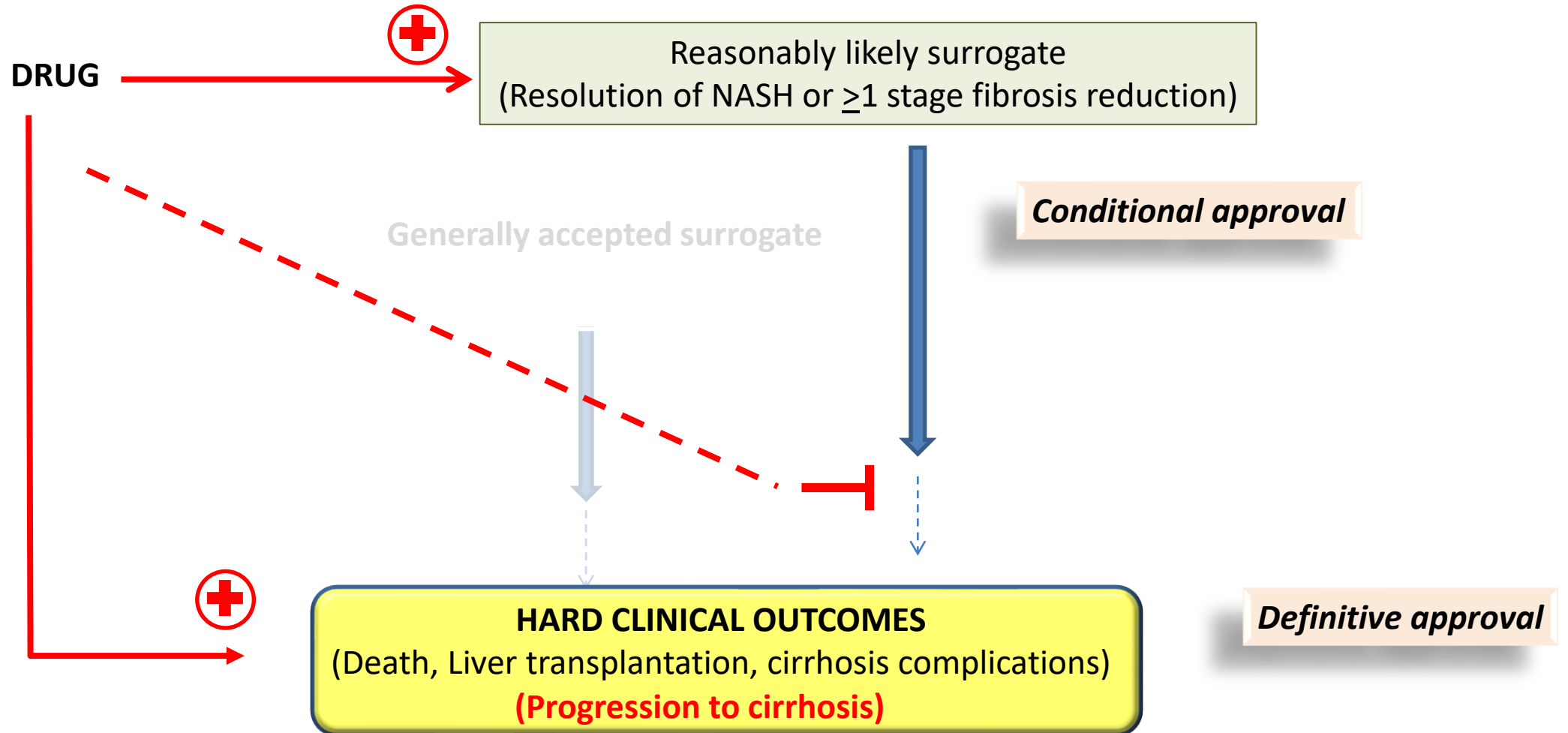
- The need to continue the outcome trials

- For clinical practice

# Validated surrogates for clinical outcomes – Shorter studies



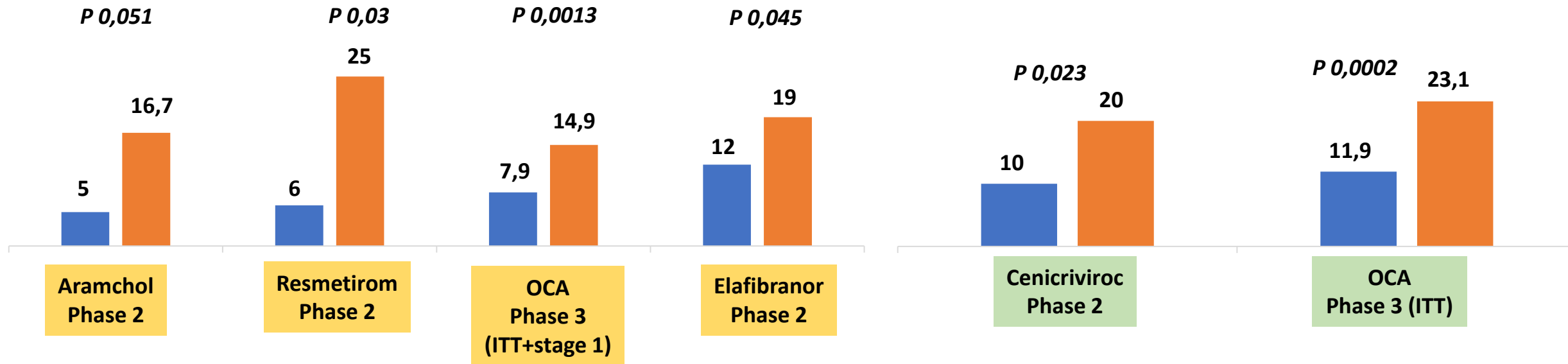
# Accelerated pathway for approval (Registrational trials)



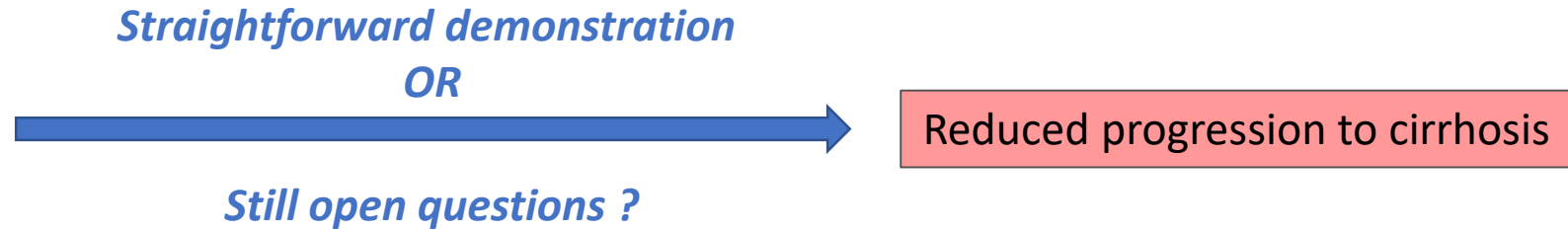
# Performance (so far) on likely surrogates of drugs in development

*Resolution of NASH w/o worsening of fibrosis*

*>1 stage fibrosis reversal w/o worsening of NASH*



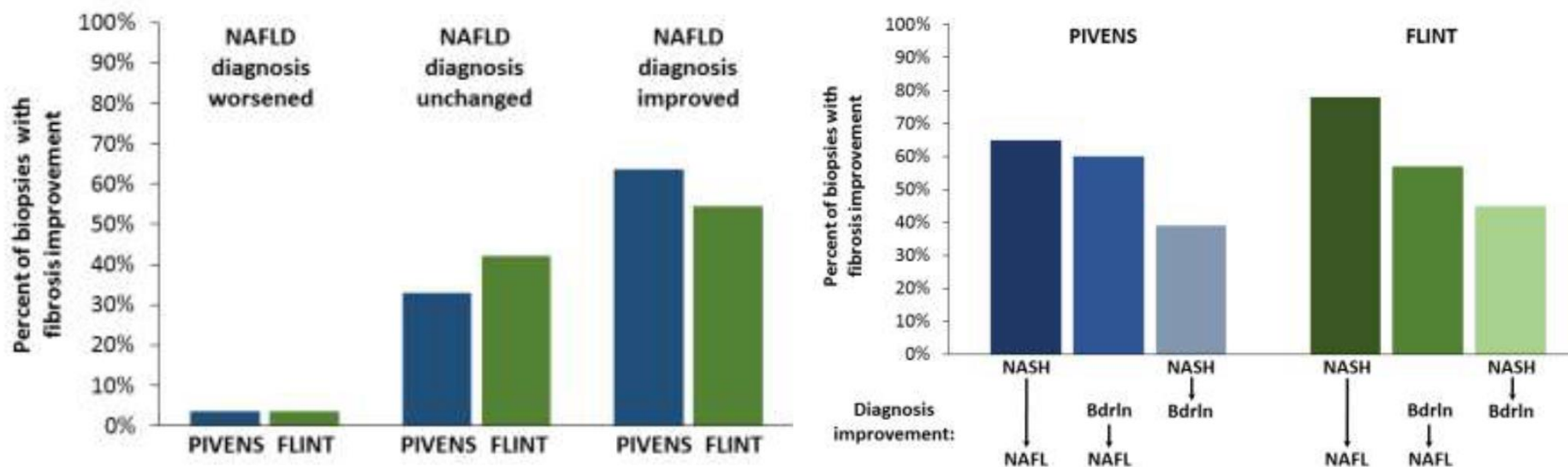
Reasonably likely surrogate  
(Resolution of NASH or  
 $\geq 1$  stage fibrosis reduction)



- Does improvement in disease activity predict less progression to cirrhosis to the same extent as NASH resolution ?

# Fibrosis regression vs. changes in other histological features

Intergated database PIVENS (38% regression of fibrosis) and PIVENS (28%)



Histological features associated with fibrosis improvement :

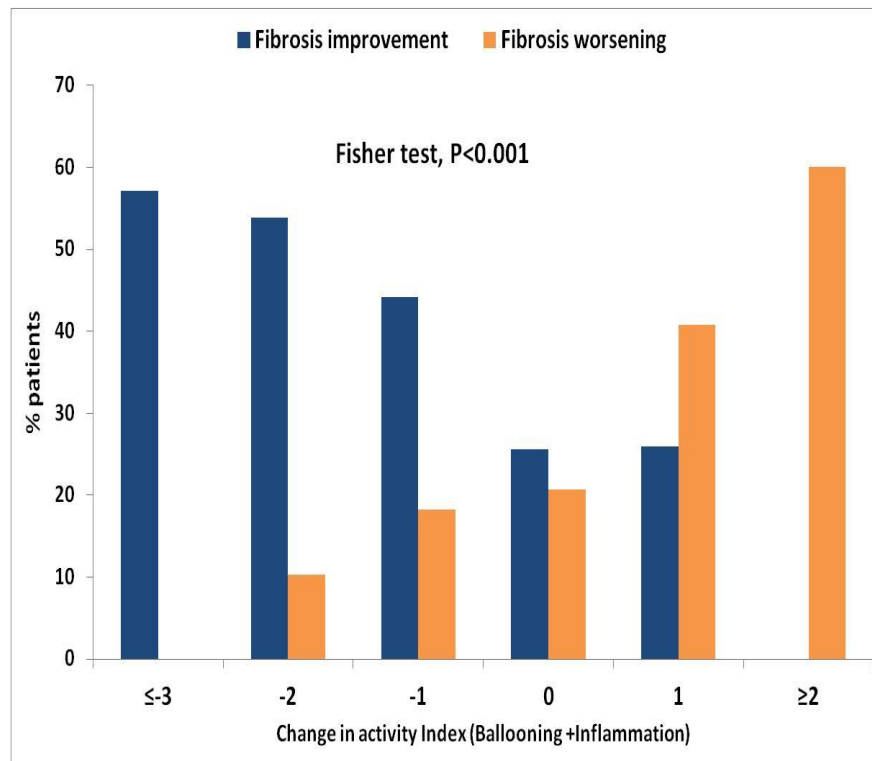
- NASH resolution +++
- NAS reduction
- Ballooning
- Mallory bodies
- Portal inflammation

# ► Changes in NASH activity index and fibrosis evolution

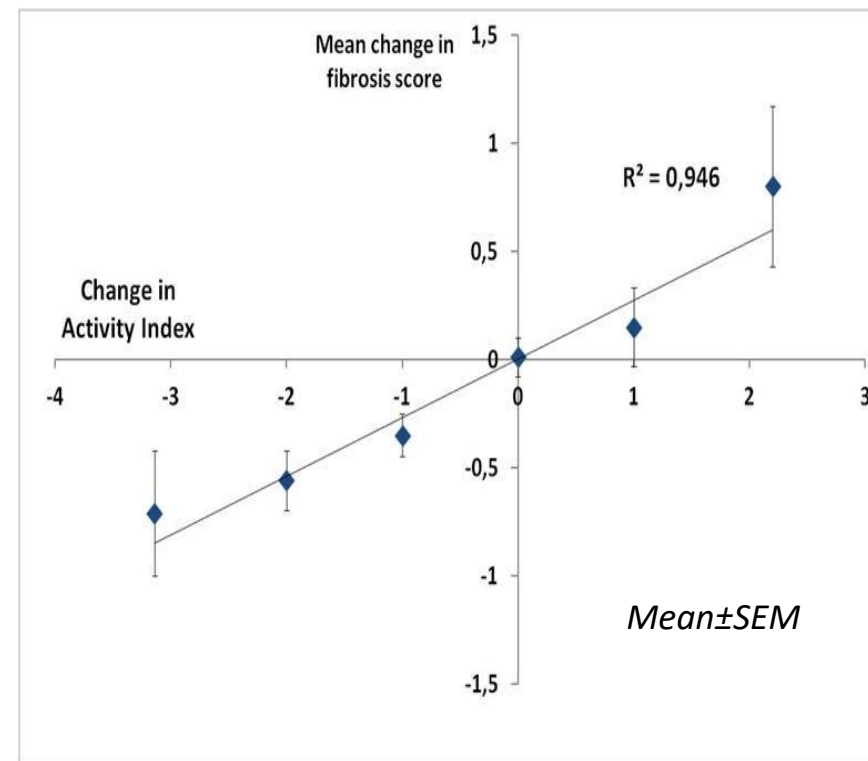
**Activity Index : sum of scores for ballooning and inflammation**

**N=234**

**% of Pts with fibrosis change**



**Mean change in scores**

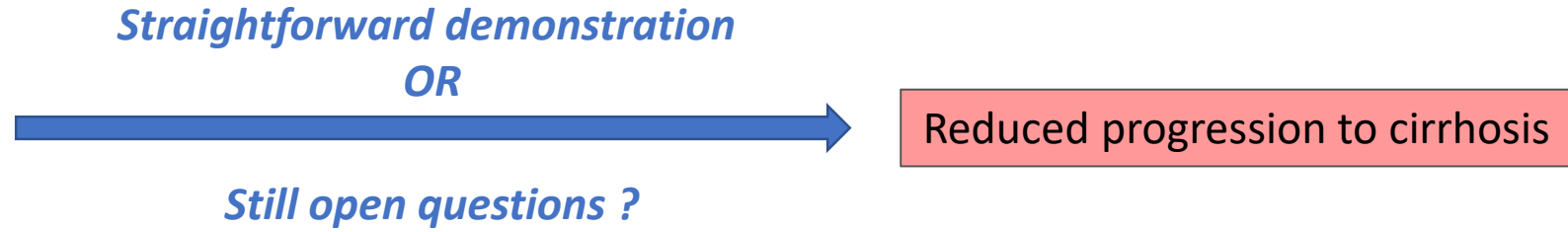




# Business



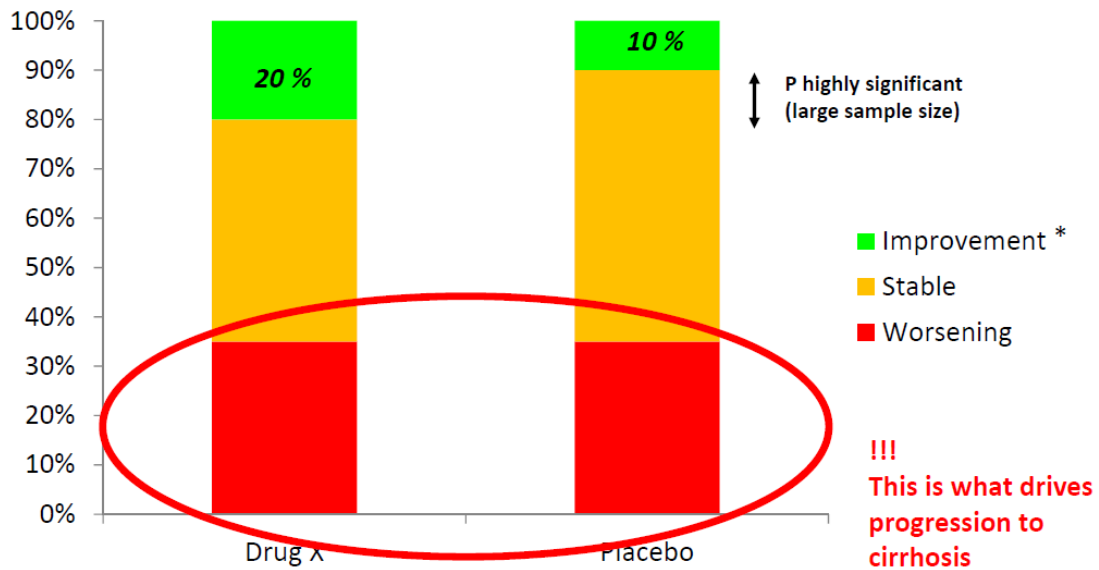
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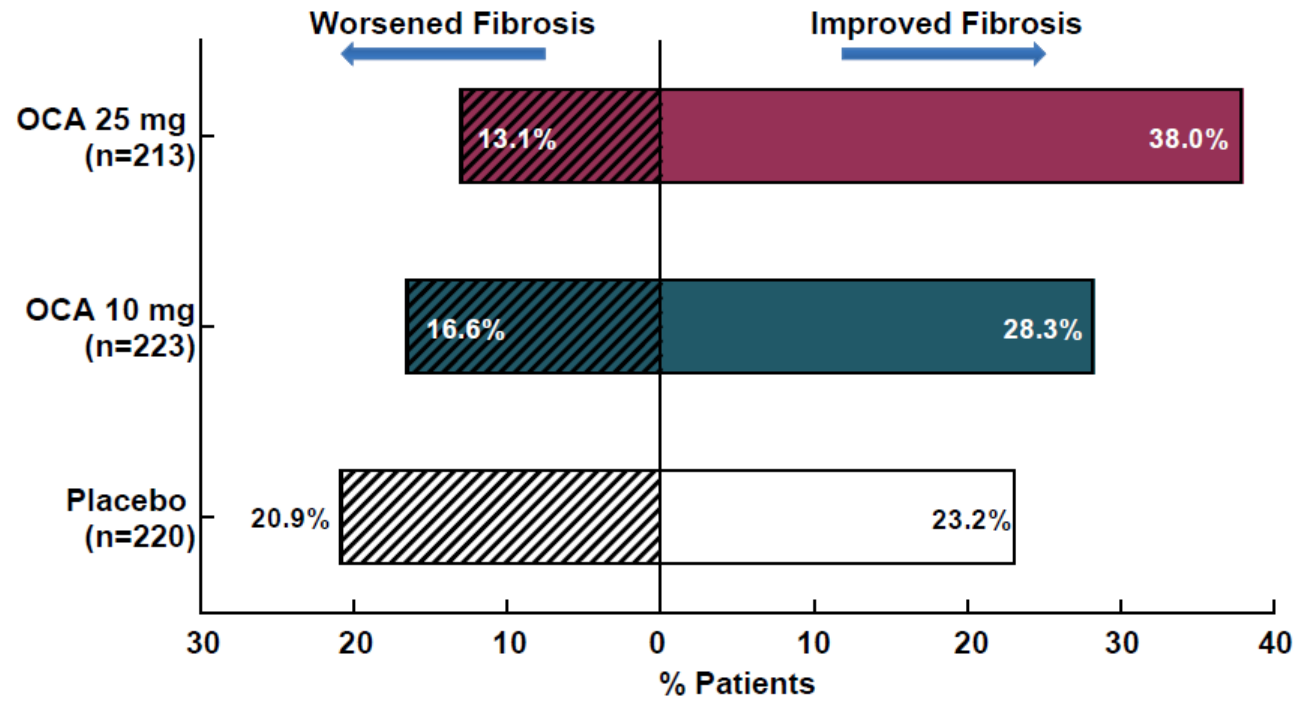
- Does improvement in disease activity predict less progression to cirrhosis to the same extent as NASH resolution ?

➔ Resolution of NASH **BUT** no effect on fibrosis ?

➔ Does  $\geq 1$  stage fibrosis improvement truly predict less progression to fibrosis ?

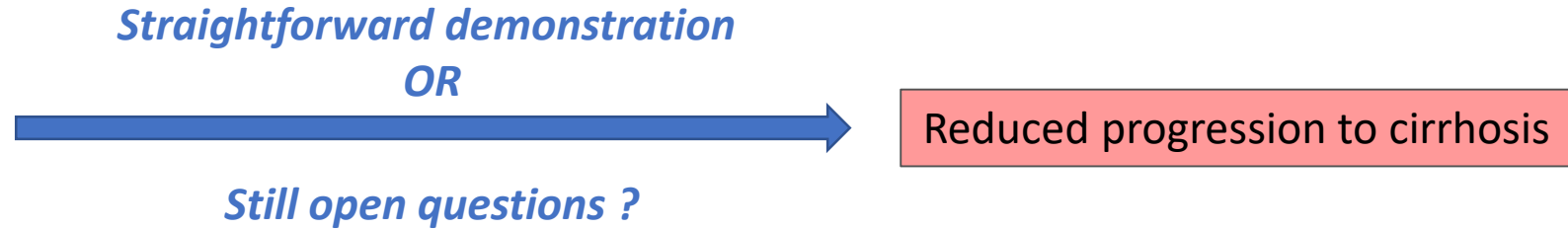


Ratziu, J Hepatol 2018




REGENERATE, ILC 2019

Reasonably likely surrogate  
(Resolution of NASH or  
 $\geq 1$  stage fibrosis reduction)



- Does improvement in disease activity predict less progression to cirrhosis to the same extent as NASH resolution ?
  - Resolution of NASH **BUT** no effect on fibrosis ?
  - Does  $\geq 1$  stage fibrosis improvement truly predict less progression to fibrosis ?
- ➡ If the interim analysis is successful, should the remaining patients still be biopsied at the interim time point ?
- ➡ How many times does this paradigm need to be proven ?

# How will conditional approval change the current landscape?

- For trials
  - The demonstration of the predictive value of the likely surrogate
    -  The need to continue the outcome trials
- For clinical practice

## ISSUES WITH TRIAL RETENTION IN OUTCOME TRIALS

### ● There is an approved drug ...

*No definitive proof of efficacy on relevant endpoints  
Stringent methodological requirements necessary for all drugs*

*Assess the situation on an individual basis –  
if a patient improves at the interim, continue !*

### ● Trial fatigue ...

*Simplified follow-up, but visits /3 months still necessary*

### ● Why continue in a non-responder ? ...

*Response may be slower in some patients (true for 12 mo interim analyses...)*

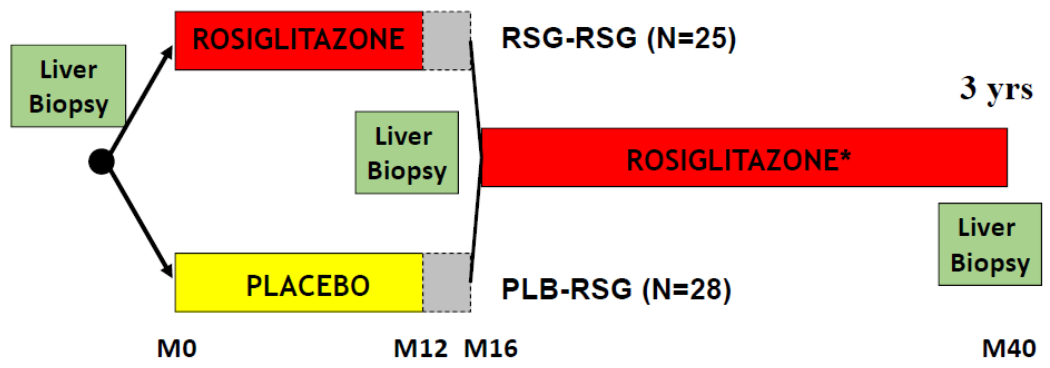
### ● What if I am on placebo ? ...

*Progression to cirrhosis will not go unnoticed ...  
Lower chances of being on placebo (1:2 randomisation)*

## REASONS WHY COMPLETING OUTCOME TRIALS IS IMPORTANT

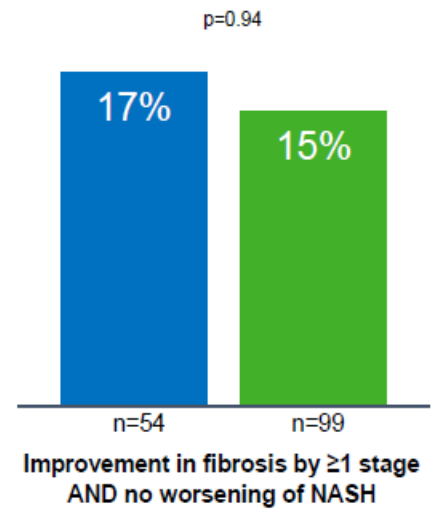
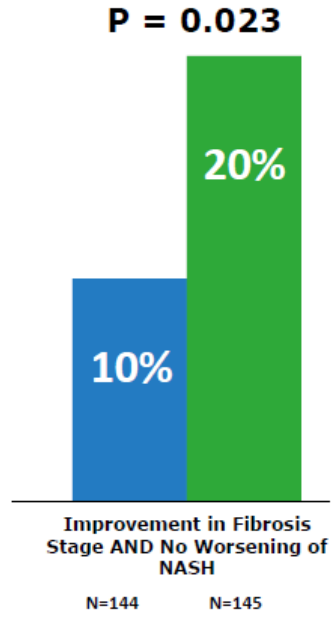
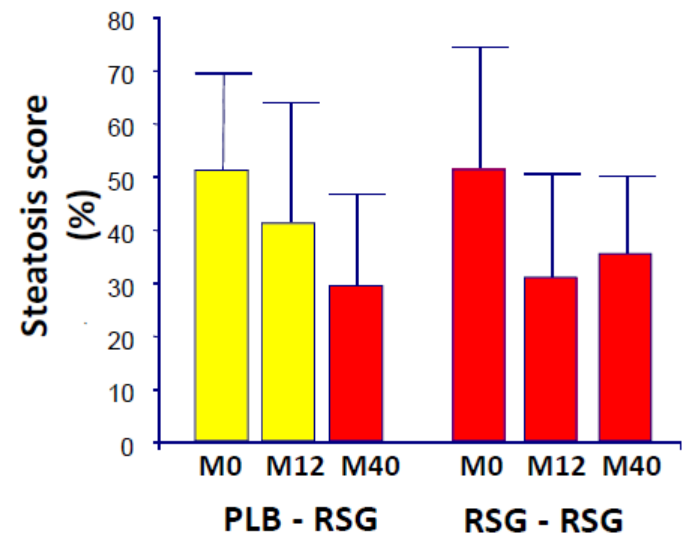
- To justify long-term therapy
- To validate the surrogate/for definitive approval

*Can one year efficacy results be extrapolated to life-long therapy ?*



	Year 1	Year 2
Arm A	CVC	CVC
Arm B		
Arm C	Placebo	Placebo

■ Placebo  
■ CVC





## REASONS WHY COMPLETING OUTCOME TRIALS IS IMPORTANT

- To understand the natural history (placebo arm)
- To justify long-term therapy
  - Can one year efficacy results be extrapolated to life-long therapy ?*
- To validate the surrogate/for definitive approval

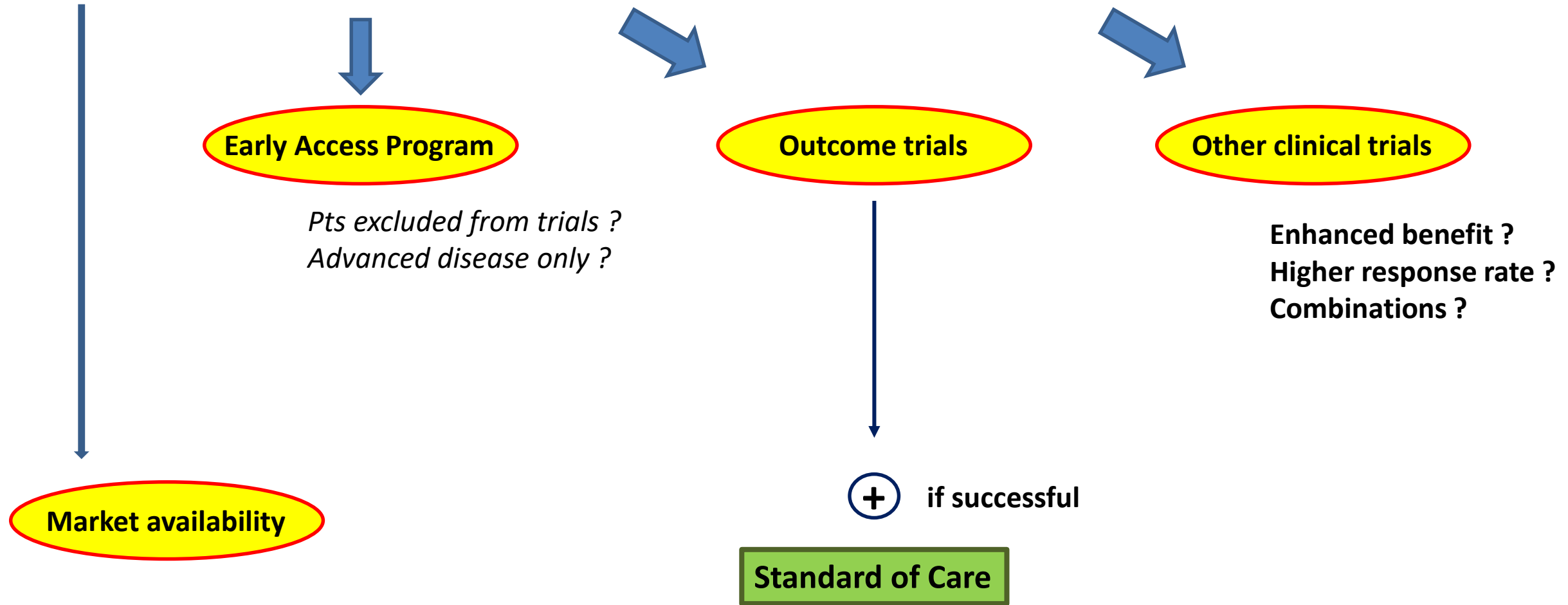
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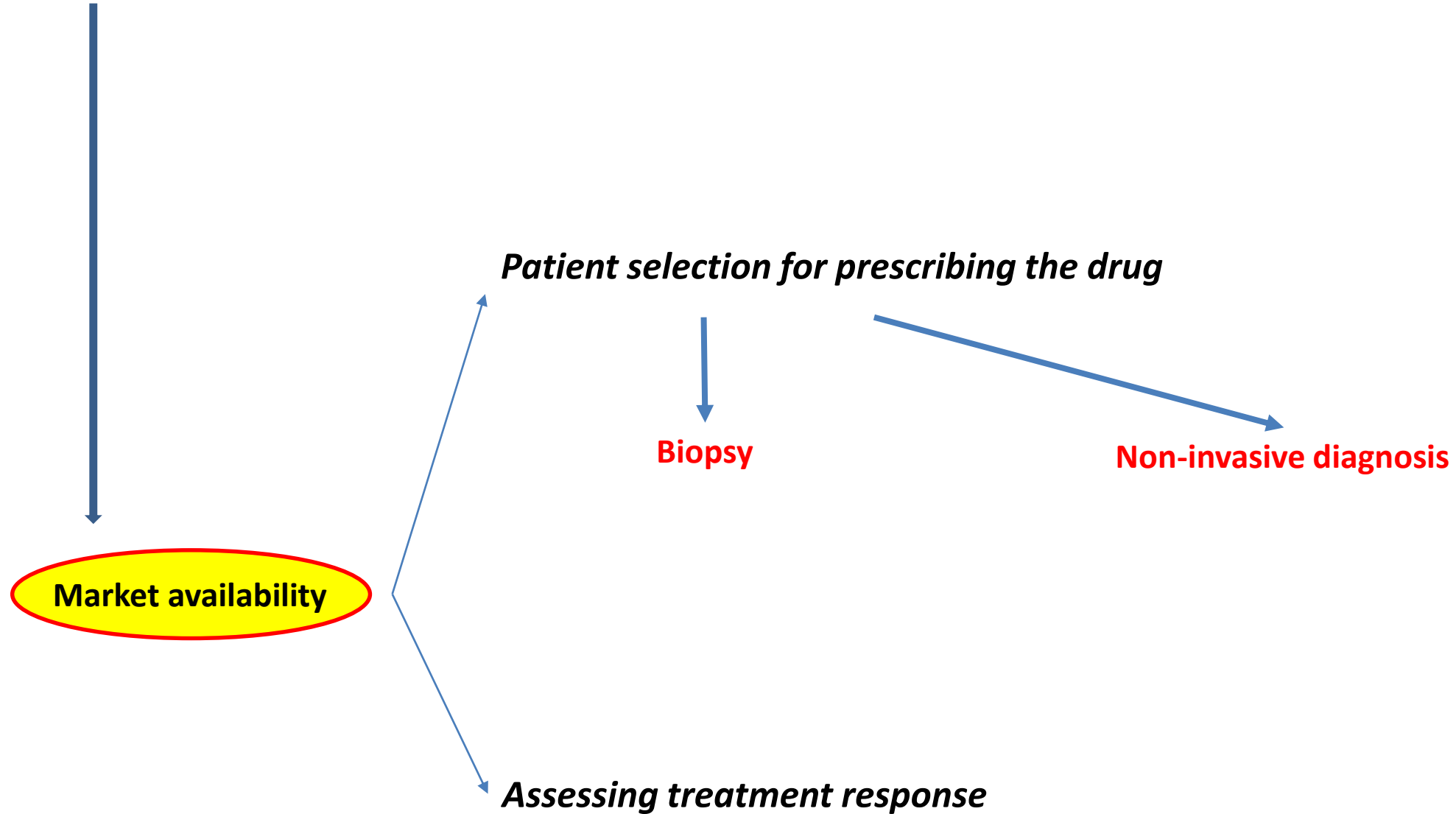
- The demonstration of the predictive value of the likely surrogate
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 For clinical practice

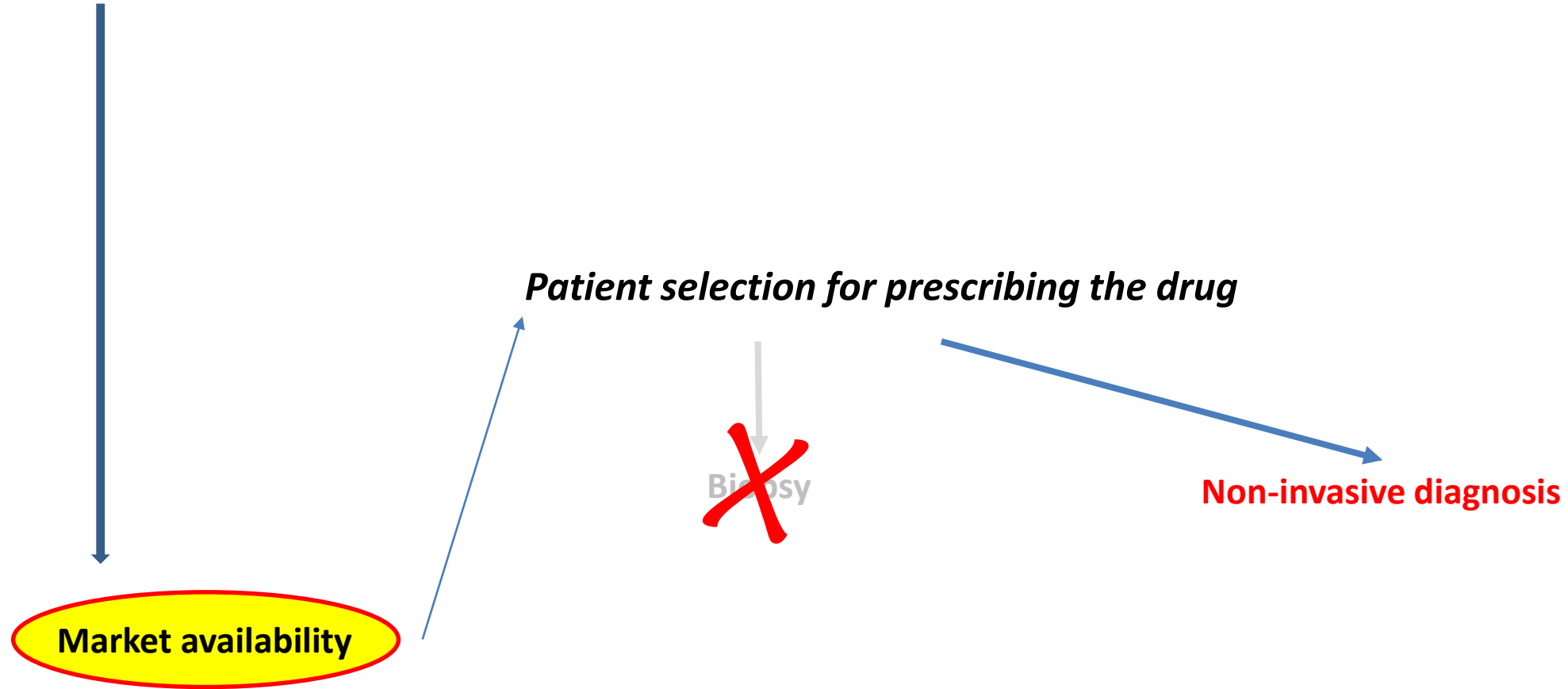
# LANDSCAPE AT TIMING OF CONDITIONAL APPROVAL



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# Selecting patients for therapy without liver biopsy !

## • NIS 4 (Genfit)

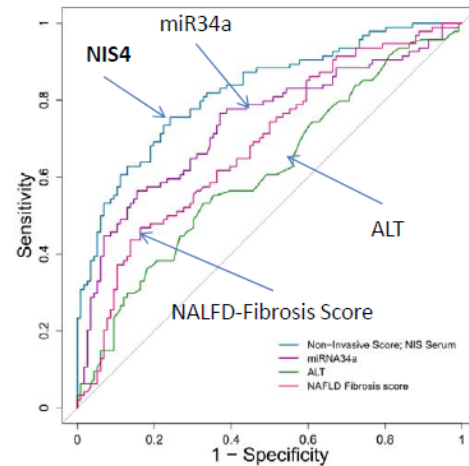
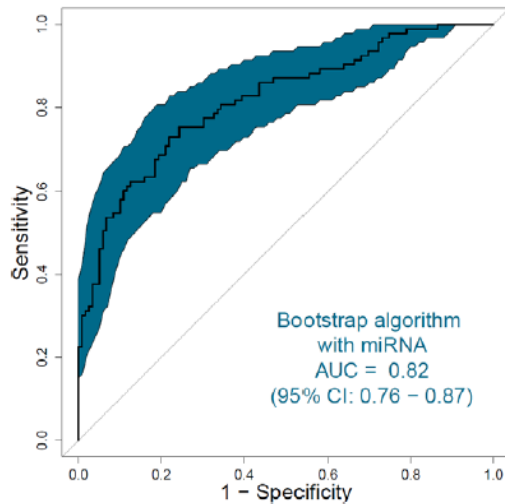
- To-be-Treated (NAS $\geq$ 4, F $\geq$ 2) vs. Not-To-Be –Treated (NAS $<$ 4, F $<$ 2)

NIS4 includes: **miR34a**, Alpha2-macroglobulin, CH3L1 (YKL40) and HbA1C

Baseline data from GOLDEN and RESOLVE-IT trials (N = 714)

Training set: 220 patients from GOLDEN trial

Validation set: first 467 patients screened for inclusion in RESOLVE-IT



Courtesy R Hanf, Genfit

## • Fibroscan-CAP-AST (Echosens)

> 450 patients with suspicion of NAFLD prospectively recruited



> Underwent liver biopsy within 2 weeks of FibroScan (M or XL probe according to the automatic probe recommendation tool)



Steatosis

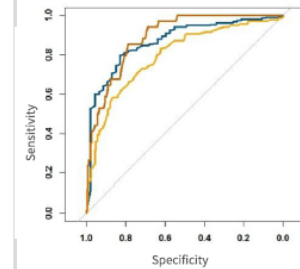
Fibrosis



CAP (dB/m)

LSM (kPa)

> Results and conclusions



CAP for steatosis (S $\geq$ 1):  
> AUC = 0.87 (0.82-0.92)

LSM for advanced fibrosis (F $\geq$ 3):  
> AUC = 0.80 (0.75-0.84)

LSM for cirrhosis (F=4):  
> AUC = 0.89 (0.84-0.93)

> Steatosis or probe type had no impact on LSM (multivariable analysis)

>>> CAP and LSM by FibroScan are reliable biomarkers to non-invasively assess liver steatosis and fibrosis respectively in NAFLD

Gastroenterology

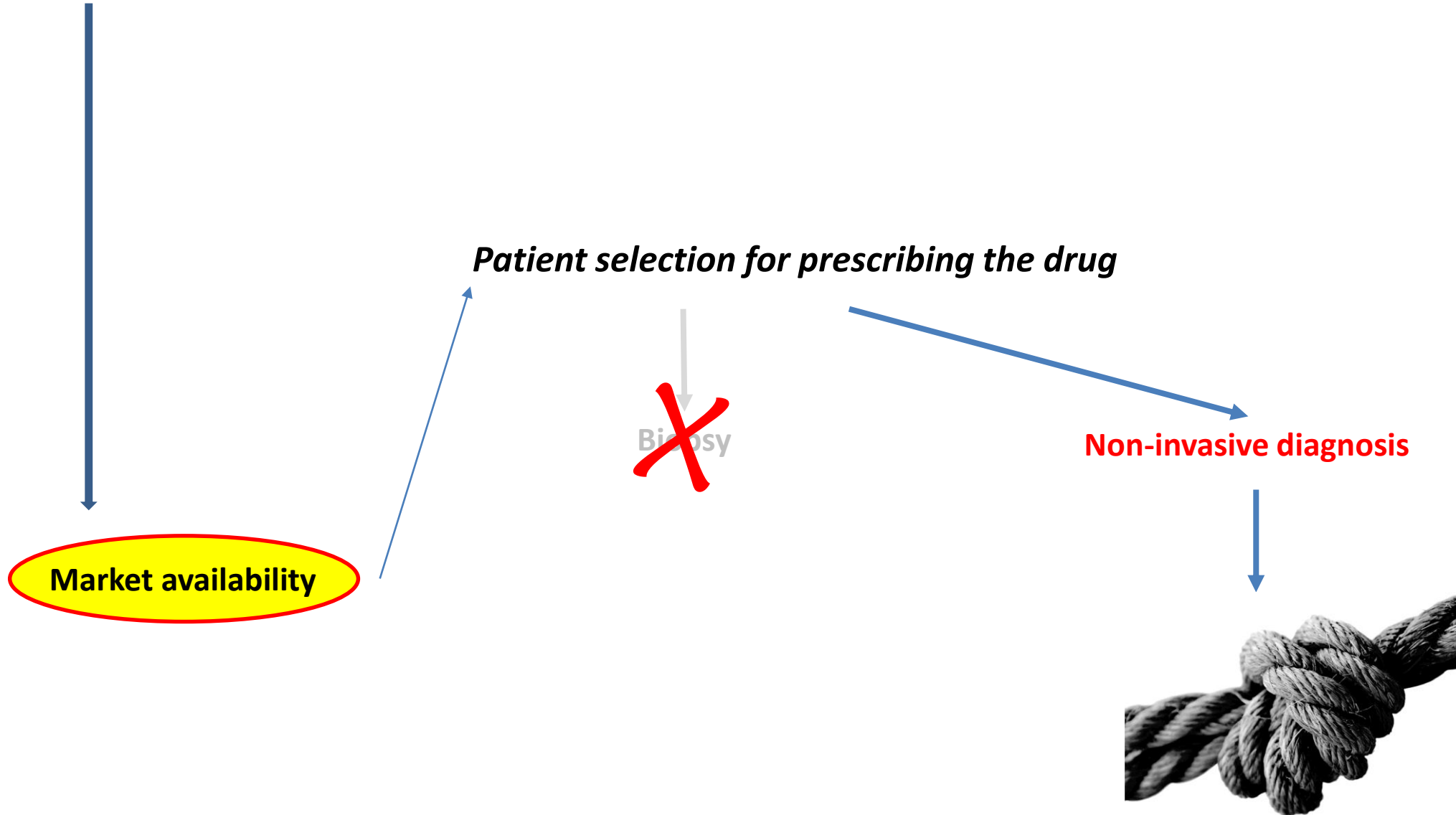
Eddowes Gastroenterology 2019

Newsome AASLD 2018

## • Clinical algorithms (ex Gilead AASLD 2018)

Anstee AASLD 2018, Younossi AASLD 2018

# LANDSCAPE AT TIMING OF CONDITIONAL APPROVAL



# Exceeding the limits of liver histology markers<sup>☆</sup>

# AUROC the higher the better ??

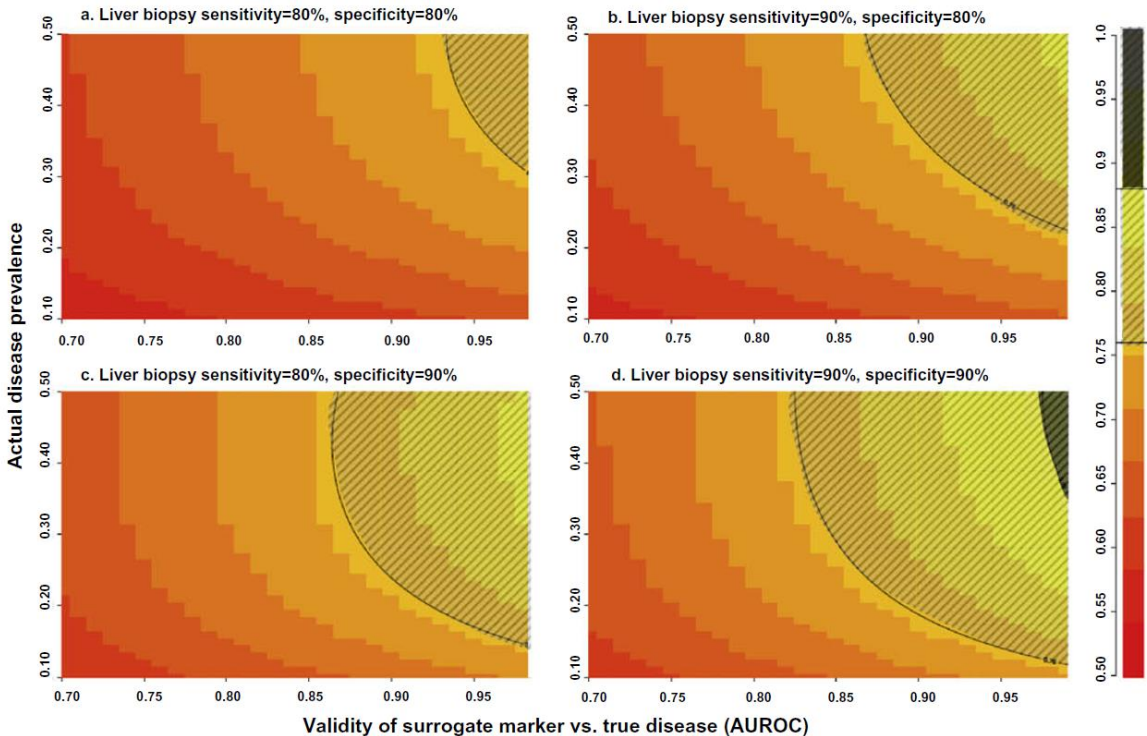
Shruti H. Mehta<sup>1</sup>, Bryan Lau<sup>1,2</sup>, Nezam H. Afdhal<sup>3</sup>, David L. Thomas<sup>1,2,\*</sup>

<sup>1</sup>Department of Epidemiology, Johns Hopkins Bloomberg School of Public Health, 1830 E Monument St, Room 455-ID, Baltimore, MD 21287, USA

<sup>2</sup>Department of Medicine, Johns Hopkins School of Medicine, Baltimore, MD, USA

<sup>3</sup>Liver Center, Beth Israel Deaconess Medical Center, Harvard Medical School, Boston, MA, USA

**Results:** In the ‘best’ scenario where liver biopsy accuracy is highest (sensitivity and specificity of biopsy are 90%) and the prevalence of significant disease 40%, the calculated AUROC would be 0.90 for a perfect marker (99% actual accuracy) which is within the range of what has already been observed. With lower biopsy sensitivity and specificity, AUROC determinations >0.90 could not be achieved even for a marker that perfectly measured disease.



Editorial

EASL EUROPEAN ASSOCIATION FOR THE STUDY OF THE LIVER | JOURNAL OF HEPATOLOGY

## Serum fibrosis markers: Death by validation or a leap of faith?

Vlad Ratziu

Université Pierre et Marie Curie, Assistance Publique – Hôpitaux de Paris, Hôpital Pitié Salpêtrière, INSERM UMRS 893, Paris, France

See Article, pages 238–244



# LANDSCAPE AT TIMING OF CONDITIONAL APPROVAL

