



3rd Paris NASH Symposium

French-US Meetings

July 6 & 7, 2017

Institut Pasteur - Paris

Organized by
Arun Sanyal & Lawrence Serfaty

Virginia Commonwealth University School of Medicine, Richmond, Virginia, US
Hôpital Saint-Antoine, APHP, Inserm, Université Pierre & Marie Curie, Paris, France

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SHORTENING TIMELINES AND IMPROVING EFFICIENCY IN DRUG DEVELOPMENT

-Seamless drug development paradigms

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Challenges in Clinical Development in NASH

- ▶ No regulatory Guidelines towards approval
- ▶ Limitations of preclinical models to replicate the disease in humans
- ▶ Long asymptomatic natural history: Time to hard endpoints is long
- ▶ No validated non-invasive biomarkers as surrogate endpoints
- ▶ Disease progression is bidirectional
- ▶ Limitations of liver biopsy as a surrogate marker
 - Sampling variability
 - Intra and Inter-subjects variability in interpretation

Clinically Meaningful Benefit

- ▶ Based on how a patient feels:
 - symptoms
 - quality of life
- ▶ Based on how a patient functions:
 - functional status (impairment or improvement in ability to lead a normal active life)
- ▶ Based on patient morbidity and mortality:
 - survival
 - liver-related outcomes
 - rates of hospitalization (resource utilization)

Surrogate Endpoints: Regulatory Perspective

Generally Accepted

- ▶ Substantial body of literature available
- ▶ Quality of data is strong
- ▶ Surrogate should reflect:
 - Mortality?
 - Other clinical outcomes
- ▶ Surrogate should have:
 - Content and face validity
 - Sensitivity to change

Reasonably Likely

- ▶ Less amount of data available
- ▶ Quality of data not as strong
- ▶ Surrogate should have:
 - Reasonable likelihood of reflecting change in health status based on its relationship to biology of disease
 - Sensitivity to change

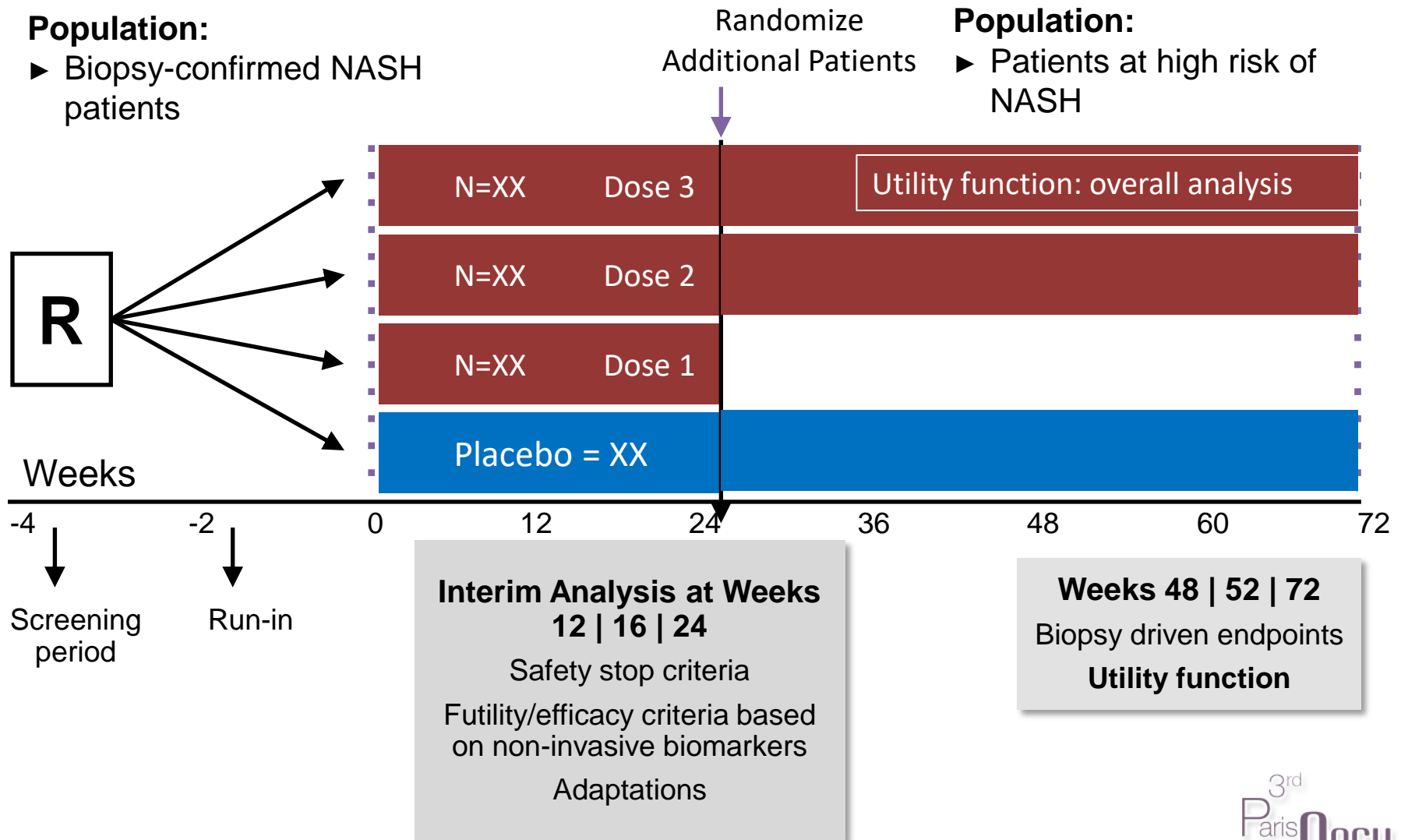
Rationale for the use of Adaptive Design in NASH

- ▶ High unmet need for an approved therapy
- ▶ Number of patients with biopsy-confirmed NASH and/or willing to have multiple liver biopsies is very limited
- ▶ Disease progression and regression are not well understood
- ▶ It may take several years to progress to cirrhosis and generate clinical outcomes
- ▶ Currently accelerated/conditional approval involves a 2-step approach

Adaptive Design in NASH: Potential Advantages

- ▶ Provides an opportunity for prospective planning of modifications of one or more aspects of a study
 - Adding or dropping treatment arms
 - Re-estimating sample size
 - Changes in the allocated proportion of subjects in one or more arms
- ▶ Allows evaluation of data collected from different stages for a combined analysis
- ▶ May help minimize the overall number of patients required during the entire drug development process
- ▶ Allows the same subjects to move from one phase to another, reducing the need to find additional subjects willing to undergo multiple biopsies
- ▶ May reduce the clinical development process/ overall time to reach marketing approval

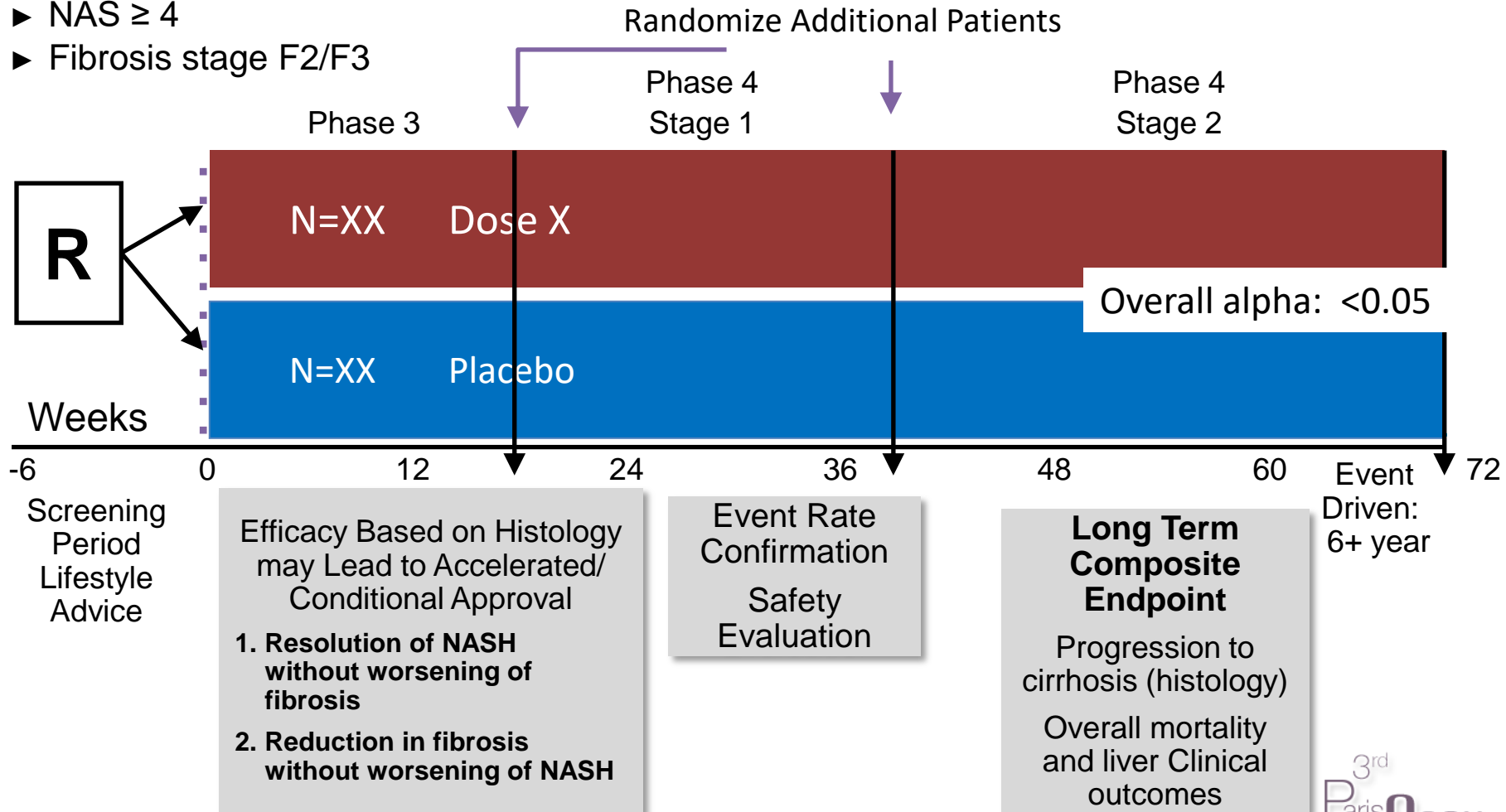
Proof of Concept/Dose Ranging Adaptive Trial Design



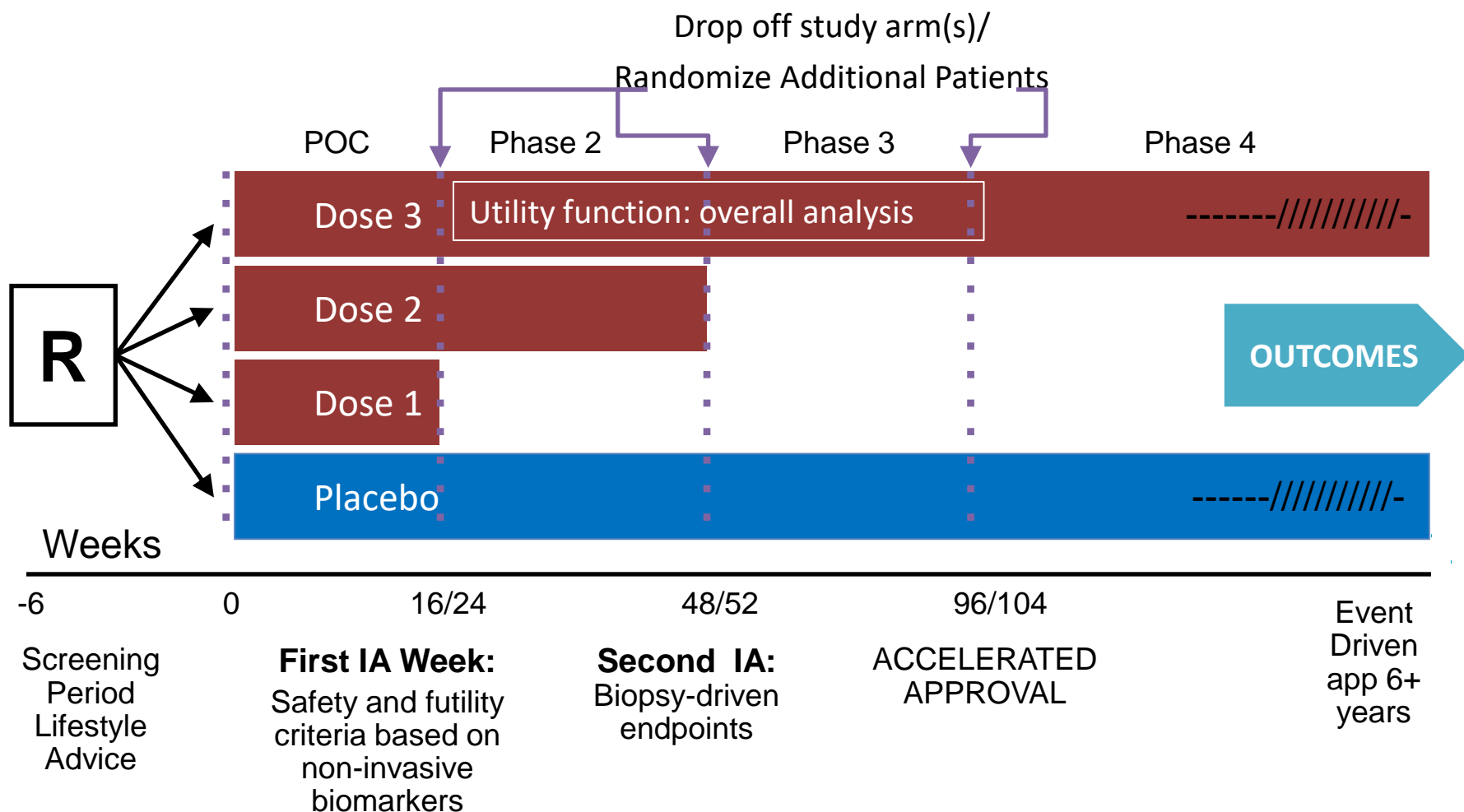
Phase 3/4 Adaptive Design

Population:

- ▶ Biopsy confirmed NASH
- ▶ NAS ≥ 4
- ▶ Fibrosis stage F2/F3



Seamless Phase 2/3/4 Adaptive Study Design



Seamless Phase 2/3/4 Adaptive Study Design

- ▶ Sample size is often selected to power the study for detecting a meaningful treatment effect at the end of the phase 3.
- ▶ Limited power for critical decision making (e.g., for dose selection or dropping arms) .
- ▶ A precision analysis is recommended to assure that the selected dose has achieved statistical significance
 - The dose with highest confidence level for achieving statistical significance will be selected
 - The doses with confidence levels for achieving statistical significance less than 75% will be dropped.
- ▶ A trend test (e.g. Cochran Armitage test) may be considered
- ▶ To protect the trial integrity due to the un-blinding of the interim data, a very small alpha (e.g., 0.0001) is recommended.

Adaptive Design in NASH: Potential Limitations

- ▶ Prevent potential operational biases that may arise during the evaluation of the interim data:
 - Identification, minimization and control of sources of bias/variation;
 - Overall type I error control rate at a pre-specified alpha level
 - Maintain the quality, validity and integrity of data: outline roles and responsibilities of a data safety monitoring committee.
- ▶ Need for multiple liver biopsies and long term follow-up of phase 2/3/4 seamless trials may limit the number of patients who are willing to participate.
- ▶ The need for type 1 error control with a very small alpha increases the total number of patients to allow reasonable power.

Conclusions

- ▶ High unmet need of an approved therapy
- ▶ Seamless adaptive clinical designs may have several advantages:
 - Reduce the overall number of patients and timelines without compromising the quality of the evidence needed to establish the efficacy and safety of therapeutic agents
 - Flexibility for pre-planned adaptations
 - The use of a utility function may allow all endpoints to be linked for the overall analysis
- ▶ But some limitations:
 - Operational complexity
 - Need to control of potential operational bias
 - Need of multiple liver biopsy and long-term follow-up

Thank you



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