

# Advancing the Discipline of Regulatory Science for Medical Product Development: An Update on Progress and a Forward-Looking Agenda

## An IOM Workshop



## Innovation in Modeling and Integrating Information: The CAMD Knowledge Model for AD

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Head Neurosciences Clinical Pharmacology, Global Innovative Pharma,  
Pfizer, on behalf of



- The Problem

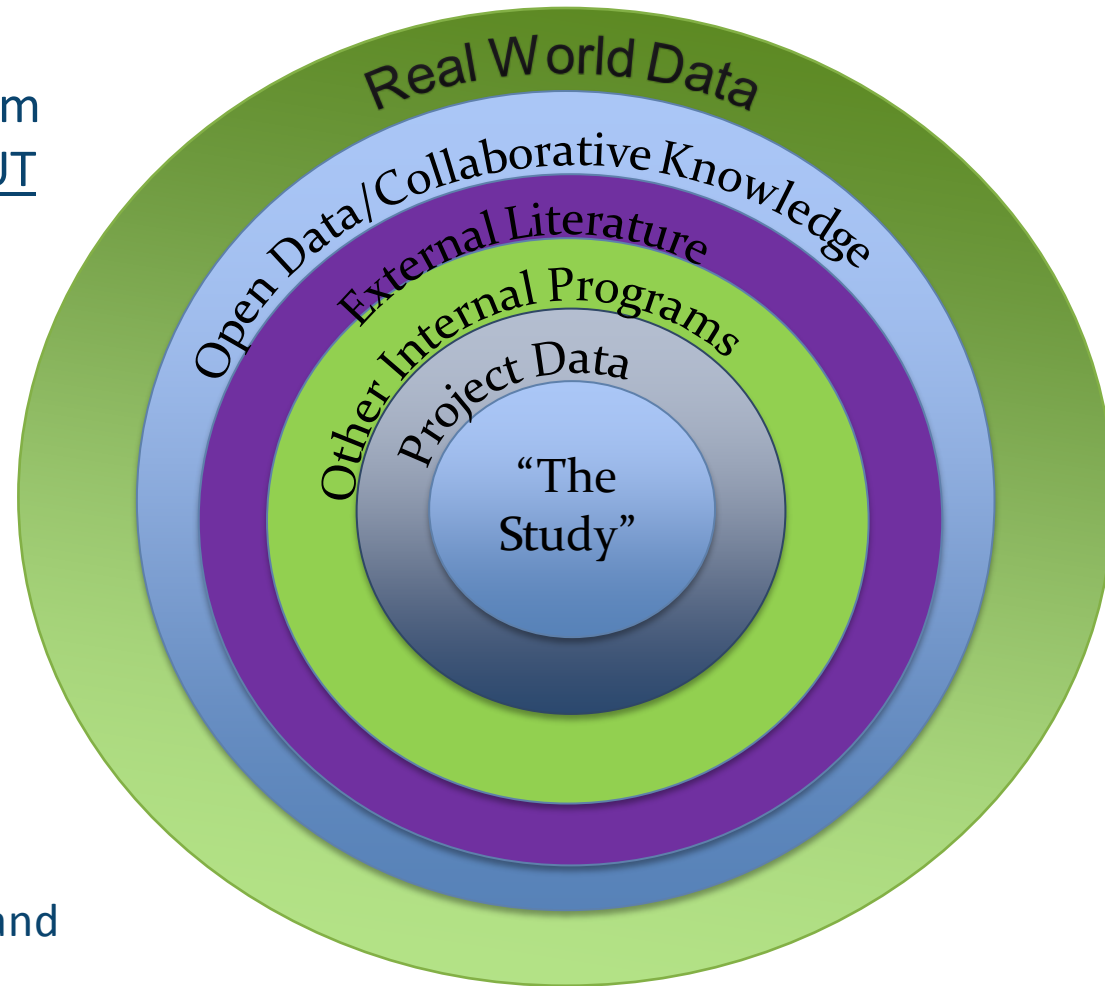
- The Trialist's Dilemma
- limitations of “going it alone” in Model Based Drug Development (MBDD) in AD

- The Solution: CAMD

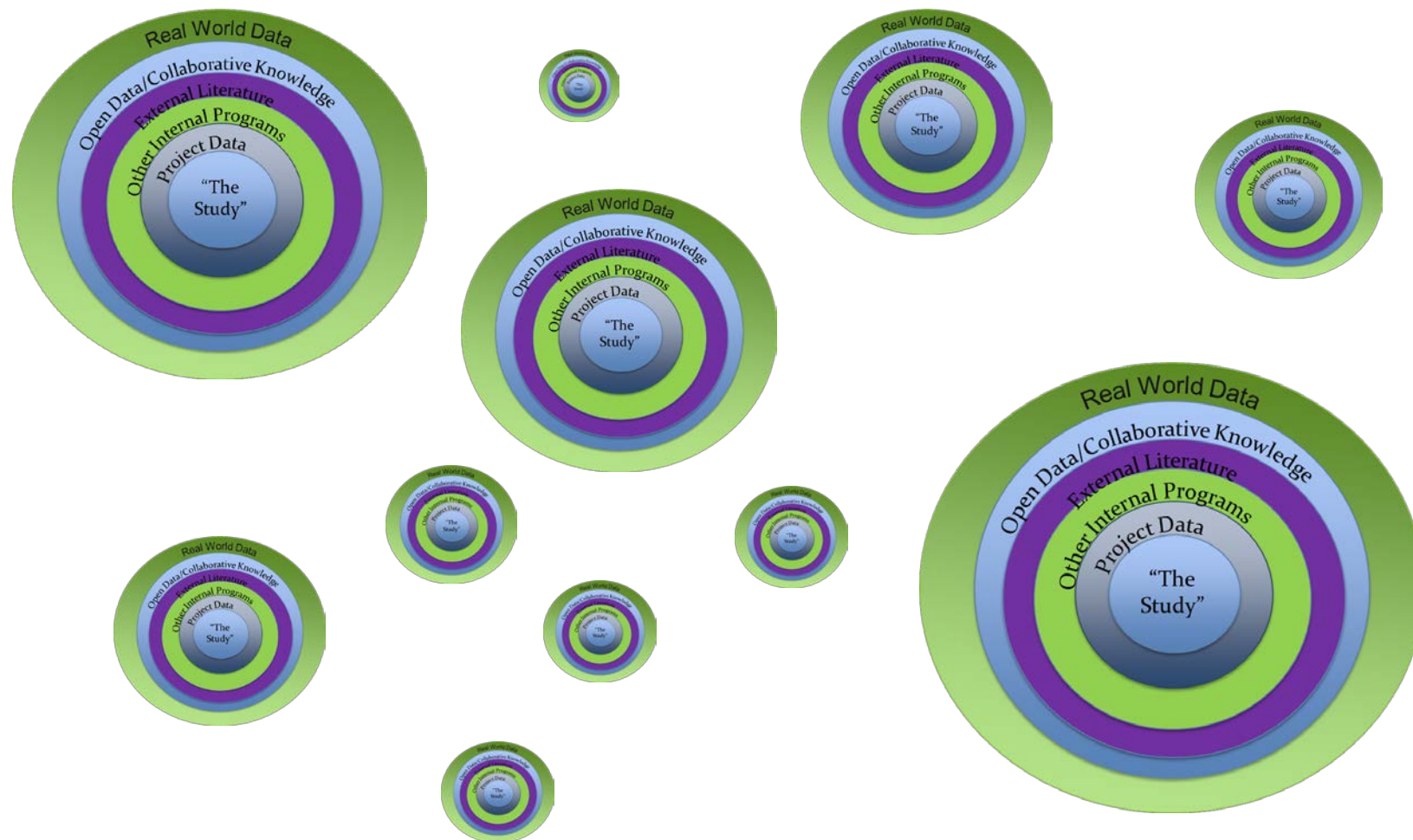
- Data Standards
- Data Collection
- A Knowledge Model for Disease Progression
- Qualification

- Lessons Learned

- The larger the “Knowledge Radius”, the more likely the team is to make a “good decision” BUT
- The larger the radius, the less likely it is that a team/organization will have a “systematic” structure for integrating and managing the information (KM)
- “Human Factors”
  - Confirmation Bias
  - Framing and Anchoring
  - Availability Heuristic (Temporal and Vivid) (LPCF)
  - Weighting



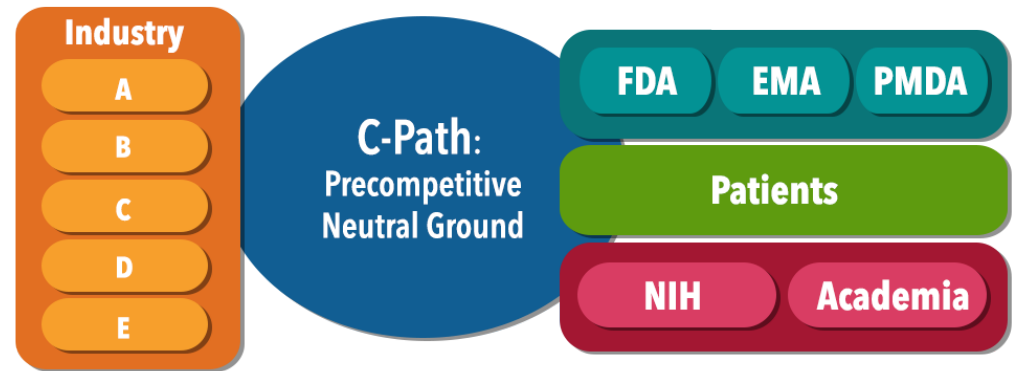
# Going it Alone vs a Consortia Approach



**Different Data = Different Results**

# C-Path: A Public Private Partnership

- Act as a trusted, neutral third party
- Convene scientific consortia of industry, academia, and government for sharing of data/expertise
  - ✓ The best science
  - ✓ The broadest experience
  - ✓ Active consensus building
  - ✓ Shared risk and costs



- Enable iterative EMA/FDA/PMDA participation in developing new methods to assess the safety and efficacy of medical products
- Official regulatory endorsement of novel methodologies and drug development tools



## Industry

- Abbvie
- Acorda Therapeutics
- Actelion Pharmaceuticals
- Allergan
- Almac
- Amgen
- AstraZeneca
- Biogen Idec
- Boehringer Ingelheim
- Bracket
- Bristol-Myers Squibb
- Celgene
- Cepheid
- CRF Health
- CROnos
- Daiichi Sanyko
- Edetek
- Eisai
- Eli Lilly and Company
- EMD Serono
- Epihian
- ERT
- Exco InTouch
- Forest Laboratories, Inc.
- Fujirebio Diagnostics
- GE Healthcare
- Genentech
- Genzyme
- GlaxoSmithKline
- Hoffmann-La Roche, Inc.
- Horizon Pharma
- ICON
- Ironwood Pharmaceuticals
- Johnson & Johnson Pharmaceutical Research & Development, LLC
- Medical Care Corporation
- Medidata Solutions
- Meso Scale Discovery
- Merck and Co., Inc.
- Millennium: The Takeda Oncology Company
- Mitsubishi Tanabe Pharmaceutical Commercialization, Inc.
- Pharsight/Certara
- Tanabe Pharma
- Novo Nordisk
- Orion Corporation
- Oracle
- Otsuka Pharmaceutical
- Pfizer
- PMDA Pharmaceuticals
- PHT
- Sanofi
- STC
- Shire
- Sunovion Pharmaceuticals
- TAG
- Takeda
- Teva Pharmaceuticals
- UCB
- Vertex

## Nonprofit Research Organization

- Alzheimer's Association
- Alzheimer's Foundation of America
- Bill & Melinda Gates Foundation
- CDISC
- Engelberg Center for Health Care Reform
- EDCTP
- Flinn Foundation
- Foundation for National Institutes of Health
- National MS Society
- Parkinson's UK
- PKD Foundation
- Reagan-Udall Foundation
- Science Foundation Arizona
- SRI International
- Stop TB Partnership
- TB Alliance

## Government and Regulatory Agencies

- Center for Disease Control
- European Medicines Agency
- Innovative Medicines Initiative
- International Genomics Consortium
- National Institute of Allergy and Infectious Diseases
- National Institute of Diabetes and Digestive and Kidney Diseases
- National Institutes of Health
- National Institute of Neurological Disorders and Stroke
- U.S. Food and Drug Administration
- World Health Organization

## Government and Regulatory Agencies

- University of Arizona
- Arizona State University
- Baylor University
- University of California San Francisco
- University of Colorado-Denver
- Emory University
- University of Florida
- Johns Hopkins
- Mayo Clinic
- University of Texas Southwestern
- Tufts University

- Klaus Romero (CAMD)
- Kaori Ito (Pfizer)
- James A. Rogers (Metrum)
- Daniel Polhamus (Metrum)
- Mahesh Samtani (J&J)
- Richard Meibach (Novartis)
- Richard Mohs (Lilly)
- Yaning Wang (FDA)
- Vikram Sinha (FDA)
- Maria Isaac (EMA)
- Lawrence Lesko (UoF)
- Lon Schneider (USC)
- Bill Thies (Alzheimer's Association)

Broad Input from a variety of backgrounds



- What the tool is:

- A clinical trial simulation tool to help optimize clinical trial design for mild and moderate AD, using ADAS-cog as the primary cognitive endpoint

- What it is based on:

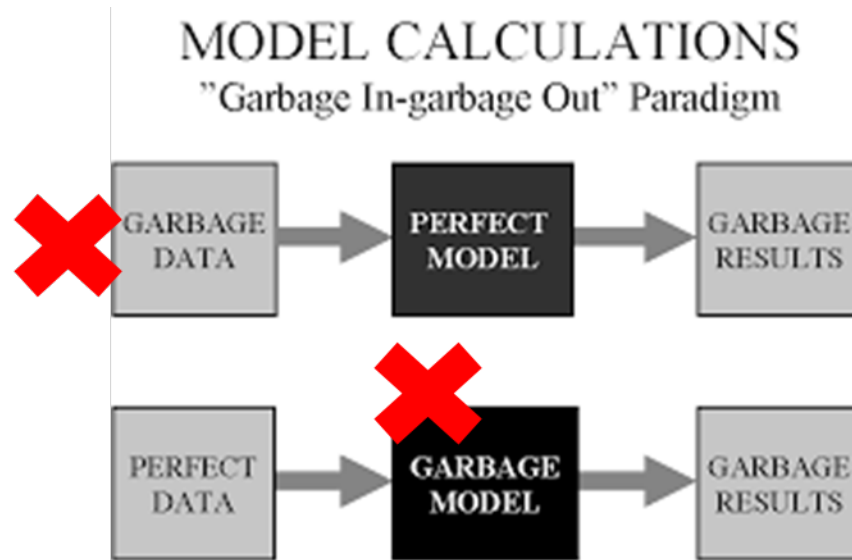
- A drug-disease-trial model that describes disease progression, drug effects, dropout rates, placebo effect, and relevant sources of variability

- What it is NOT intended for:

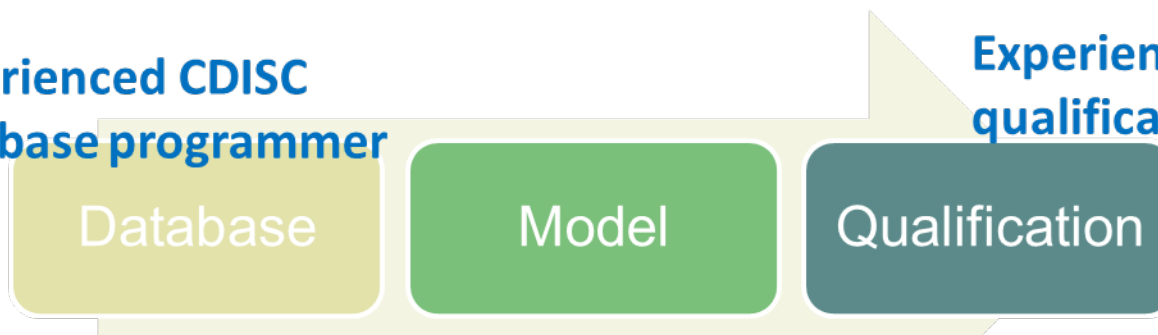
- Approve medical products without the actual execution of well conducted trials in real patients



# Developing a Comprehensive Database (Endpoints, Covariate) is Critical for Success



experienced CDISC  
database programmer



Experienced DDT  
qualification process

Experienced modeling team

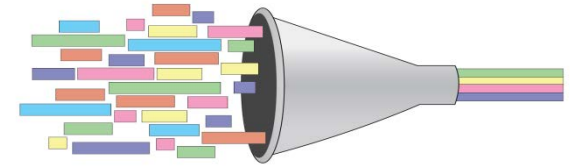
# Step 1: Data Standards

A			C			D		
1	Study #	MMSE	ADAS-cog					
2								
3								
4								
5								
6								
7								

A			B			C			D		
1	Study Number	Visit Number	ADAS-cog	MMSE							
2											
3											
4											
5											

A			C			D		
1	Study Number	MMSE	ADAS-cog					
2								
3								
4								
5								

Disparate Legacy Data



CDISC Data Standards

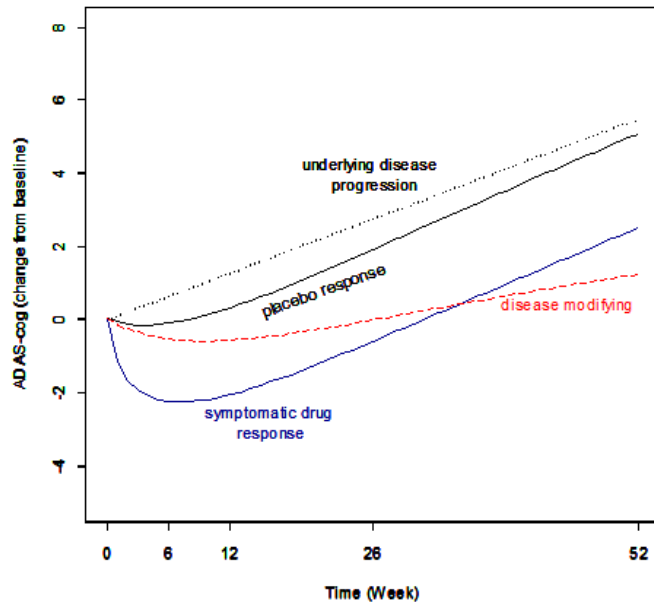


A			B			C			D		
1	Study Number	Visit Number	MMSE	ADAS-cog							
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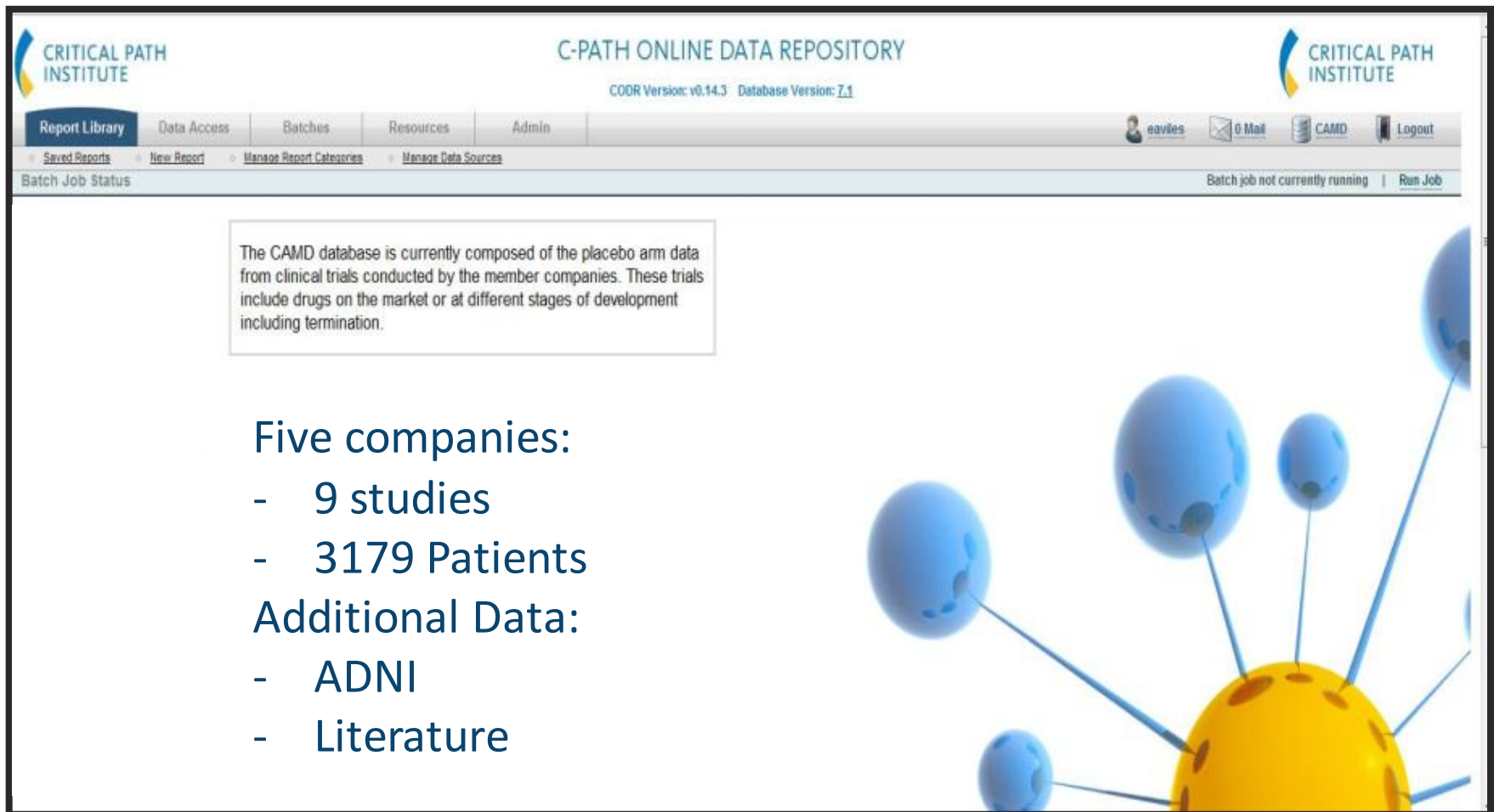
Integrated Data



Deterioration



# Step 2: CODR Database



The screenshot shows the C-PATH ONLINE DATA REPOSITORY interface. At the top, the Critical Path Institute logo is on the left, the title 'C-PATH ONLINE DATA REPOSITORY' is in the center, and the version information 'CODR Version: v0.14.3 Database Version: 7.1' is on the right. Below the title bar is a navigation menu with tabs: 'Report Library' (selected), 'Data Access', 'Batches', 'Resources', and 'Admin'. Under 'Report Library', there are links for 'Saved Reports', 'New Report', 'Manage Report Categories', and 'Manage Data Sources'. On the right side of the navigation bar, there are links for 'eaviles', 'Mail', 'CAMD', and 'Logout'. Below the navigation bar, there is a status bar with 'Batch Job Status' on the left and 'Batch job not currently running | Run Job' on the right. The main content area features a text box stating: 'The CAMD database is currently composed of the placebo arm data from clinical trials conducted by the member companies. These trials include drugs on the market or at different stages of development including termination.' To the right of the text box is a decorative graphic of a yellow sun with several blue spheres connected to it by lines.

Five companies:

- 9 studies
- 3179 Patients

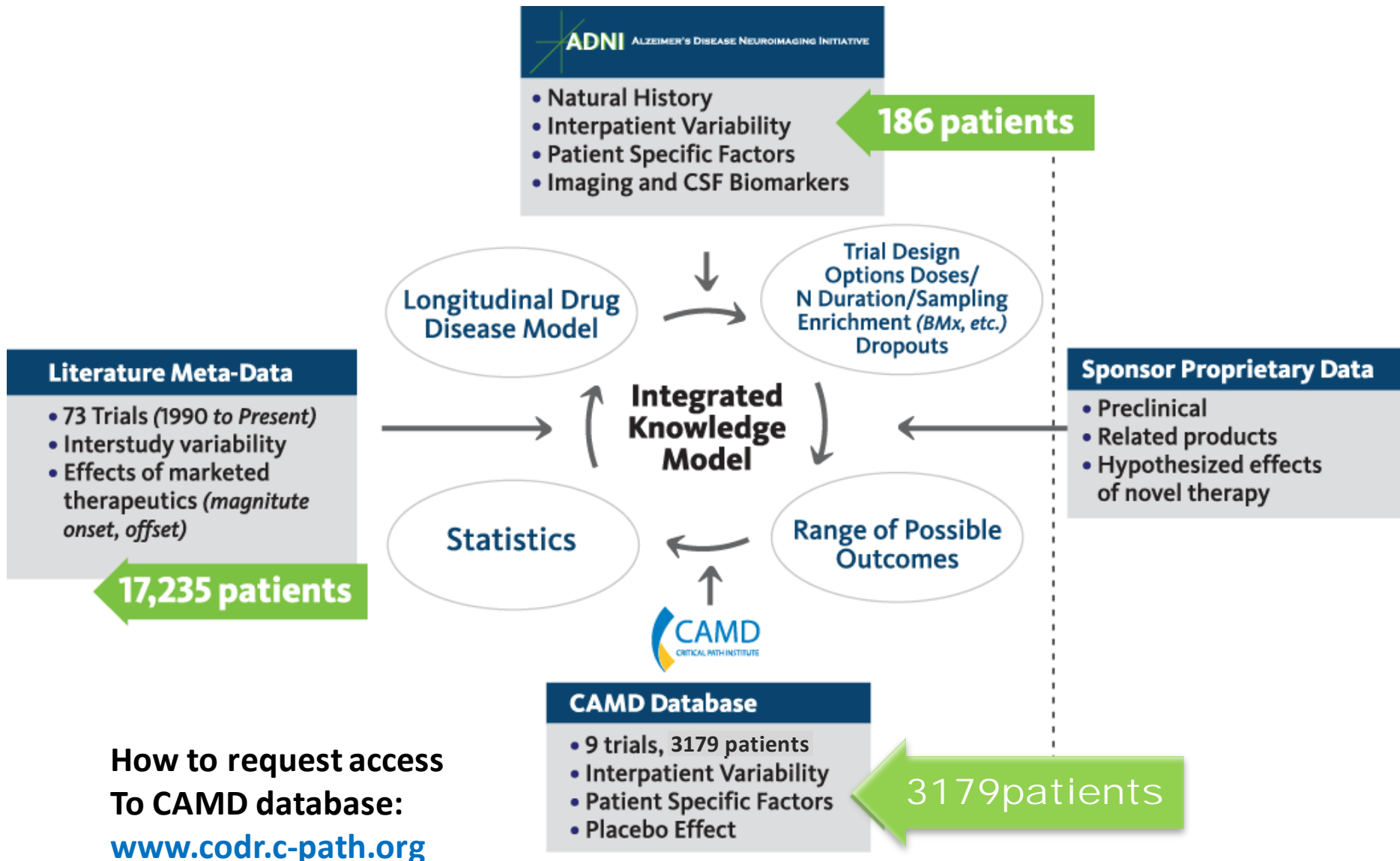
Additional Data:

- ADNI
- Literature

<https://codr.c-path.org/main/login.html>

# Step 3: AD Drug-Disease-Trial Model

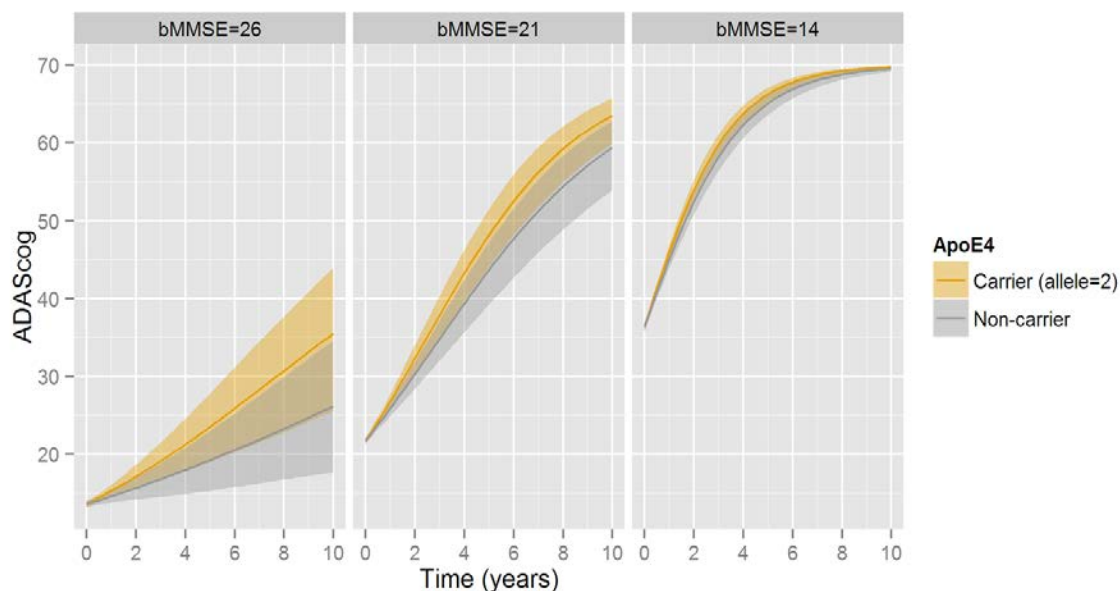
## *Integrating the Clinical Trialist's World*



- Longitudinal cognitive instrument:
  - ADAS-Cog: 11 items, 0-70 points
- Basal cognitive instrument:
  - MMSE: 8 items, 30-0 points
- Demographics:
  - Baseline age and gender
- Genetics:
  - APOE4 allele
- Biomarkers
  - Not yet

# Step 3b: Peer Reviewed Quantitative Results

Baseline Severity (BMMSE)	Gender	APOE4 allele copies	Annual progression rate	Credible Interval (90%)
16	Male	0	7.07	4.48-9.42
16	Male	1	7.14	4.49-9.54
16	Male	2	8.03	5.20-10.40
16	Female	0	6.52	3.73-9.05
16	Female	1	6.53	3.88-9.04
16	Female	2	7.55	4.76-9.78
21	Male	0	4.43	1.99-6.94
21	Male	1	4.48	2.06-6.95
21	Male	2	5.43	2.82-8.06
21	Female	0	3.97	1.42-6.57
21	Female	1	3.97	1.52-6.59
21	Female	2	4.88	2.16-7.17
26	Male	0	1.69	(-)0.28-4.00
26	Male	1	1.70	(-)0.33-4.12
26	Male	2	2.39	0.34-4.90
26	Female	0	1.35	(-)0.61-3.78
26	Female	1	1.36	(-)0.68-3.71
26	Female	2	1.37	0.02-4.53



Disease progression: 75 year-old men, by APOE4 and baseline severity



## Step 4 The Regulatory Journey

The total journey took 1317 days (*3 years, 7 months and 9 days*).

- On June 12, 2013 the FDA determined the CTS tool was “Fit for Purpose.”
- A First for FDA
- On September 19, 2013 the EMA determined the CTS tool was “Qualified for Use.”
- A First for EMA

### Submission for Regulatory Evaluation



- **Data standards critical**
- Partner with regulators early :
  - first example helped to drive “regulatory science”
  - Establish clarity in position especially around the “context of use”
- Think about model support, enhancements, support infrastructure, etc.
  - Role for organizations such as ISCTM/academia, professional organizations, others.
  - User communities
- Success Breeds Success
  - Ongoing Consortia initiatives in Parkinson’s and early AD
  - Preconference at AAPS later this month
- Most important equation
  - $S=f(t,p)$

- Rogers, JA, et al. Combining patient-level and summary-level data for Alzheimer's disease modeling and simulation: a beta regression meta-analysis. *J Pharmacokinet Pharmacodyn* (2012) 39:479–498 DOI 10.1007/s10928-012-9263-3
- Romero K, et al. Striving for an integrated drug development process for neurodegeneration: The Coalition Against Major Diseases. *Neurodegen Dis Manage* 2011;1(5): 379-85.
- Lalonde, RL, et al. Model-based Drug Development. *Clinical Pharmacology & Therapeutics*, 82: 21–32. doi: 10.1038/sj.clpt.6100235