

Considerations for the use of biomarkers in the study of rare diseases

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Disclosure Statement

- No conflicts of interest
- Nothing to disclose
- This talk reflects the views of the author and should not be construed to represent FDA's views or policies
- In this talk "drug" refers to both drugs and biologics

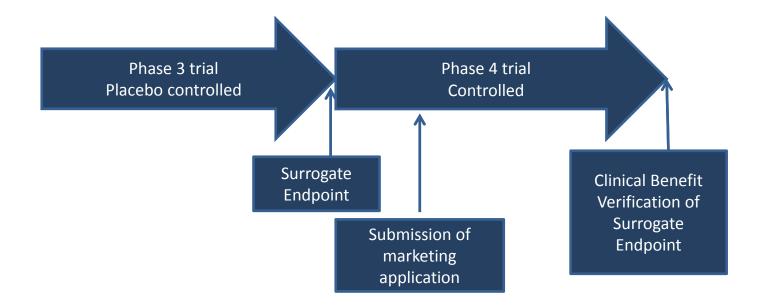
Biomarkers in Rare Disease **Drug Development?**





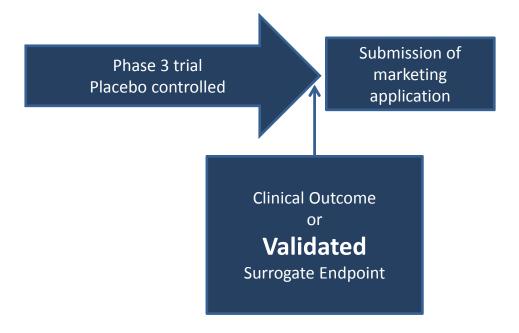


Accelerated Drug Approval





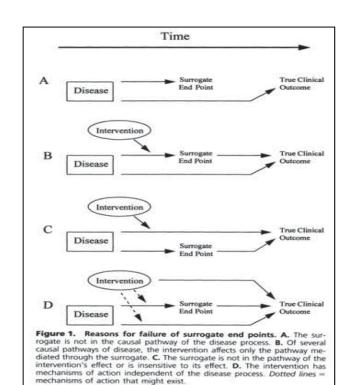
Traditional Drug Approval



FDA guidance – Expedited Programs

Why surrogate endpoints fail



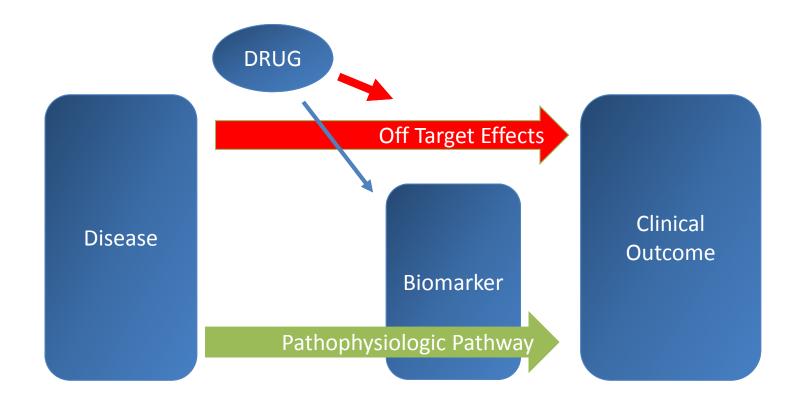


Fleming and DeMets; Ann Intern Med. 1996;125:605-613.

- A. The selected surrogate is not in the causal pathway of the disease process
- B. Multiple causal pathways exist for the disease, and the intervention affects the pathway mediated through the surrogate, but not others.
- C. The surrogate is not in the pathway of the intervention's effect or is not sensitive to its effect.
- D. The mechanisms of action of the intervention is independent of the disease process

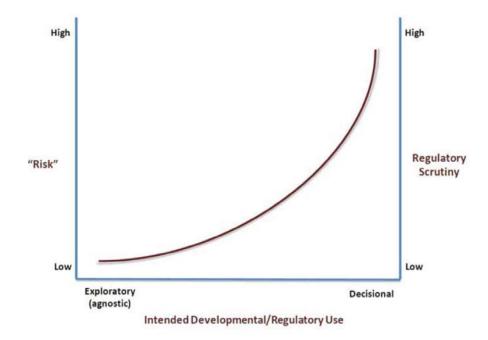


Why surrogate endpoints fail



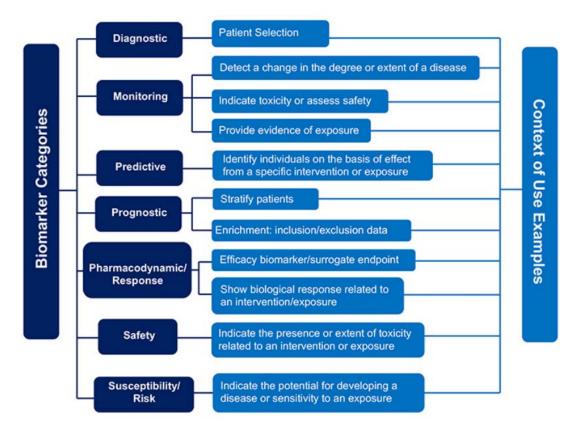
FDA

more risk = more evidence





Biomarkers have different jobs

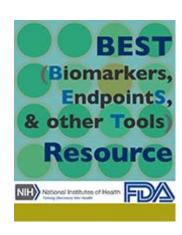




BEST:

Biomarkers, EndpointS, and other Tools

- biomarkers and endpoints in basic biomedical research, medical product development, and clinical care
- the NIH-FDA Biomarker Working Group
- http://www.ncbi.nlm.nih.gov/books/NBK326791/





Risk/susceptibility biomarker

Definition: A biomarker that indicates the potential for developing a disease or sensitivity to an exposure in an individual without clinically apparent disease.

Example: BReast CAncer genes 1 and 2 (BRCA1/2) mutations may be used as a susceptibility/risk biomarker to identify individuals with a predisposition to develop breast cancer.

BEST -http://www.ncbi.nlm.nih.gov/books/NBK326791/



Diagnostic biomarker

Definition: A biomarker used to identify individuals with the disease or condition of interest or to define a subset of the disease.

Example: Blood sugar or hemoglobin A1c (HbA1c) may be used as a diagnostic biomarker when evaluating patients to identify diabetes mellitus.

Prognostic biomarker



Definition: identifies likelihood of a clinical event, disease recurrence or progression

Examples: Total kidney volume to select patients with autosomal dominant polycystic kidney disease at high risk for progressive decline in renal function for inclusion in interventional clinical trials

BReast CAncer genes 1 and 2 (BRCA1/2) mutations to assess likelihood of a second breast cancer

BEST -http://www.ncbi.nlm.nih.gov/books/NBK326791/



Predictive Biomarker

Definition: Identifies individuals who are likely to experience a favorable or unfavorable effect from a specific intervention or exposure

Example: Human leukocyte antigen allele (HLA)—B*5701 genotype identifies human immunodeficiency virus (HIV) patients at risk for severe skin reactions from abacavir treatment



Pharmacodynamic response

Definition: A biomarker used to show that a biological response has occurred in an individual who has received an intervention or exposure

Example: Cholesterol may be used as a pharmacodynamic response biomarker when evaluating patients with hypercholesterolemia to assess response to a lipid-lowering agent or dietary changes

BEST -http://www.ncbi.nlm.nih.gov/books/NBK326791/



Safety biomarker

Definition: A biomarker used to indicate the presence or extent of toxicity related to an intervention or exposure.

Examples: Corrected QT interval (QTc) may be used as a safety biomarker to assess the potential for drugs to induce Torsades de Pointes.

Serum creatinine may be used as a safety biomarker when evaluating patients on drugs that affect kidney function to monitor for nephrotoxicity.

BEST -http://www.ncbi.nlm.nih.gov/books/NBK326791/



Monitoring biomarker

<u>Definition</u>: A biomarker measured serially and used to detect a change in the degree or extent of disease. Monitoring biomarkers may also be used to indicate toxicity or assess safety, or to provide evidence of exposure, including exposures to medical products.

Example: International normalized ratio (INR) or prothrombin time (PT) may be used as a monitoring biomarker for patients on warfarin.



Surrogate endpoint

<u>Definition:</u> An endpoint that is used in clinical trials as a substitute for a direct measure of how a patient feels, functions, or survives. A surrogate endpoint does not measure the clinical benefit of primary interest in and of itself, but rather is expected to predict that clinical benefit or harm based on epidemiologic, therapeutic, pathophysiologic, or other scientific evidence.

A "<u>validated surrogate endpoint</u>" is one that is supported by a clear mechanistic rationale and clinical data providing strong evidence that an effect on the surrogate predicts a clinical benefit. Therefore, it can be used to support traditional approval without the need for additional efficacy information.

Example: HIV-RNA reduction is a validated surrogate endpoint for human immunodeficiency virus (HIV) clinical disease control and has been used for the basis for approval of drugs intended to treat HIV.

Validation of biomarker tests



<u>Validation</u> – Establishing that the performance of a biomarker test, tool, or instrument is acceptable for its intended purpose

- Analytical validation —performance characteristics for sensitivity, specificity, accuracy, & precision, with a specified technical protocol for specimen collection, handling and storage
- Clinical validation establishing that the biomarker acceptably identifies, measures, or predicts the concept of interest.

BEST -http://www.ncbi.nlm.nih.gov/books/NBK326791/

Biomarkers in Drug Development



Phase 1

Phase 2

Phase 3

Phase 4

Pharmacokinetic biomarkers

Diagnostic -Enrollment

Prognostic -Enrichment

Pharmacodynamic

Dose selection

Prognostic – Stratification

Surrogate -Efficacy Safety

Monitoring

Predictive



Step 1

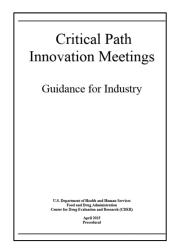


CPIMInquiries@fda.hhs.gov

Critical Path Innovation Meeting



- Discussion of the science, medicine, and regulatory aspects of innovation in drug development
- Nonbinding meeting
- Not a meeting about a specific approval pathway
- Scope includes early biomarkers and clinical outcome assessments, natural history studies, technologies (not manufacturing), and clinical trial designs and methods





Biomarker Qualification Process



Letter of Intent (LOI)

Initiates the qualification process of a biomarker for a proposed context of use (COU) in drug development



Qualification Plan (QP)

Defines the intended development to generate the necessary supportive data to qualify the biomarker for the proposed COU



Full Qualification Package (FQP)

Contains all accumulated data to support the qualification of the biomarker for the proposed COU

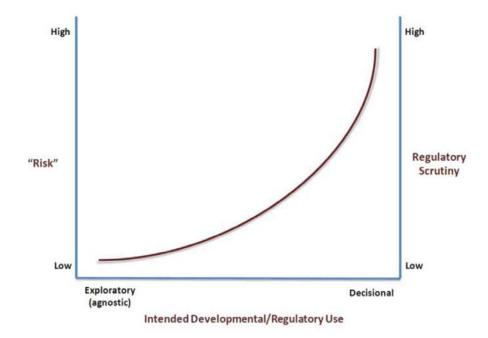




Contains FDA's determination on whether the biomarker is qualified for the proposed COU based on a comprehensive review of the FQP

FDA

more risk = more evidence





Reporting Biomarker Studies

Challenges and Standards in Reporting Diagnostic and Prognostic Biomarker Studies

Francisco Azuaje, Ph.D.¹, Yvan Devaux, Ph.D.¹, and Daniel Wagner, Ph.D., M.D.^{1,2}

BMJ Open STARD 2015 guidelines for reporting diagnostic accuracy studies: explanation and elaboration Jérémie F Cohen, 1,2 Daniël A Korevaar, 1 Douglas G Altman, 2 David E Bruns, 4 Constantine A Gatsonis, 5 Lotty Hooft, 6 Les Irwig, 7 Deborah Levine, 8,9 Johannes B Reitsma, 10 Henrica C W de Vet, 11 Patrick M M Bossuyt 1

Annals of Internal Medicine | Research and Reporting Methods

QUADAS-2: A Revised Tool for the Quality Assessment of Diagnostic Accuracy Studies

Penny F. Whiting, PhD; Anne W.S. Rutjes, PhD; Marie E. Westwood, PhD; Susan Mallett, PhD; Jonathan J. Deeks, PhD; Johannes B. Reitsma, MD, PhD; Mariska M.G. Leeflang, PhD; Jonathan A.C. Sterne, PhD; Patrick M.M. Bossuyt, PhD; and the QUADAS-2 Group*



QUADAS-2

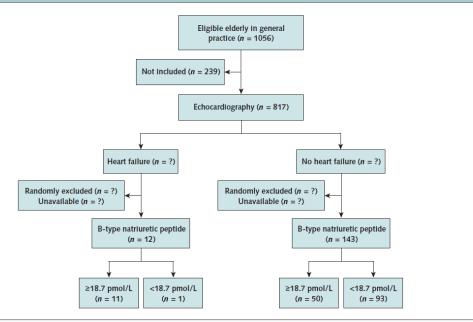
Table 1. Risk of Bias and Applicability Judgments in QUADAS-2

Domain	Patient Selection	Index Test	Reference Standard	Flow and Timing
Description	Describe methods of patient selection Describe included patients (previous testing, presentation, intended use of index test, and setting)	Describe the index test and how it was conducted and interpreted	Describe the reference standard and how it was conducted and interpreted	Describe any patients who did not receive the index tests or reference standard or who were excluded from the 2 × 2 table (refer to flow diagram) Describe the interval and any interventions between index tests and the reference standard
Signaling questions (yes, no, or unclear)	Was a consecutive or random sample of patients enrolled? Was a case-control design avoided? Did the study avoid inappropriate exclusions?	Were the index test results interpreted without know- ledge of the results of the reference standard? If a threshold was used, was it prespecified?	Is the reference standard likely to correctly classify the target condition? Were the reference standard results interpreted without knowledge of the results of the index test?	Was there an appropriate interval between index tests and reference standard? Did all patients receive a reference standard? Did all patients receive the same reference standard? Were all patients included in the analysis?
Risk of bias (high, low, or unclear)	Could the selection of patients have introduced bias?	Could the conduct or interpretation of the index test have introduced bias?	Could the reference standard, its conduct, or its interpretation have introduced bias?	Could the patient flow have introduced bias?
Concerns about applicability (high, low, or unclear)	Are there concerns that the included patients do not match the review question?	Are there concerns that the index test, its conduct, or its interpretation differ from the review question?	Are there concerns that the target condition as defined by the reference standard does not match the review question?	



QUADAS-2 Flow Diagram

Figure 2. Sample of a study flow diagram.



The diagram is based on a diagnostic cohort study on using B-type natriuretic peptide levels to diagnose heart failure. Based on data obtained from Smith H, Pickering RM, Struthers A, Simpson I, Mant D. Biochemical diagnosis of ventricular dysfunction in elderly patients in general practice: observational study. BMJ. 2000;320:906-8.



Practical Guide to QUADAS

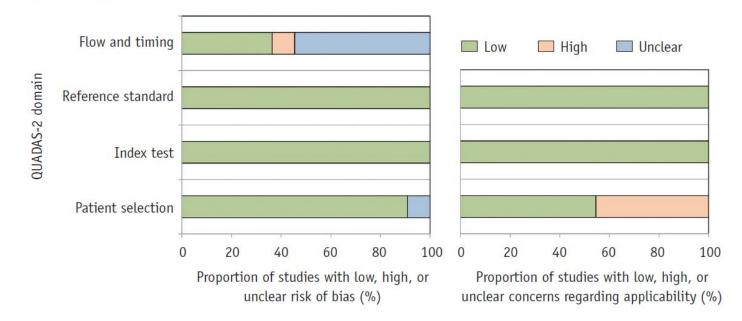
Study	Risk of bias			Applicability concerns			
	Patient selection	Index test	Reference standard	Flow and timing	Patient selection	Index test	Reference standard
Study 1	\odot	©	\odot	8	©	©	\odot
Study 2	\odot	\odot	\odot	?	\odot	\odot	\odot
Study 3	\odot	\odot	\odot	?	8	\odot	\odot
Study 4	\odot	\odot	\odot	\odot	8	\odot	\odot
Study 5	\odot	\odot	\odot	?	\odot	\odot	\odot
Study 6	?	\odot	\odot	?	8	\odot	\odot
Study 7	\odot	\odot	\odot	\odot	8	\odot	\odot
Study 8	\odot	\odot	\odot	?	\odot	\odot	\odot
Study 9	\odot	\odot	\odot	?	\odot	\odot	\odot
Study 10	\odot	\odot	\odot	\odot	\odot	\odot	\odot
Study 11	\odot	\odot	\odot	\odot	\odot	\odot	©

Kim et al. – practical approach to evaluating diagnostic test accuracy https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4644738/



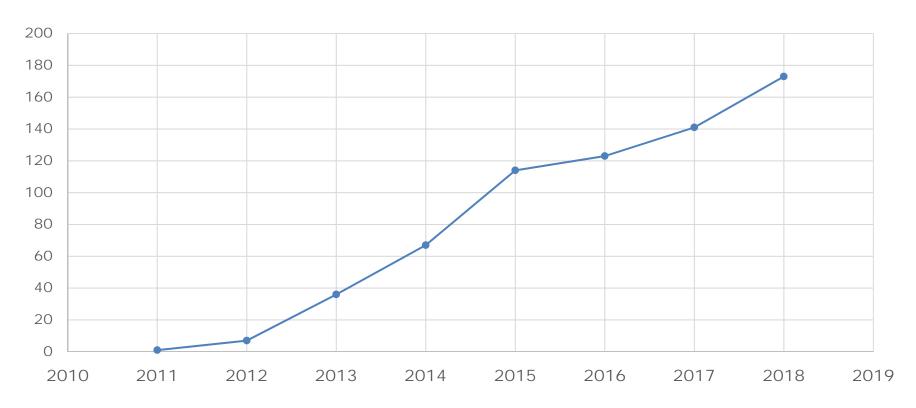
Practical Guide to QUADAS

Graphical summary of the QUADAS-2 results





QUADAS-2 Publications







Videos and Podcasts on FDA's Biomarker Qualification Program

https://www.fda.gov/Drugs/DevelopmentApprovalProcess/DrugDevelopmentToolsQualificationProgram/BiomarkerQualificationProgram/ucm558083