

**SocraTec R&D**  
W e m a k e i t w o r k

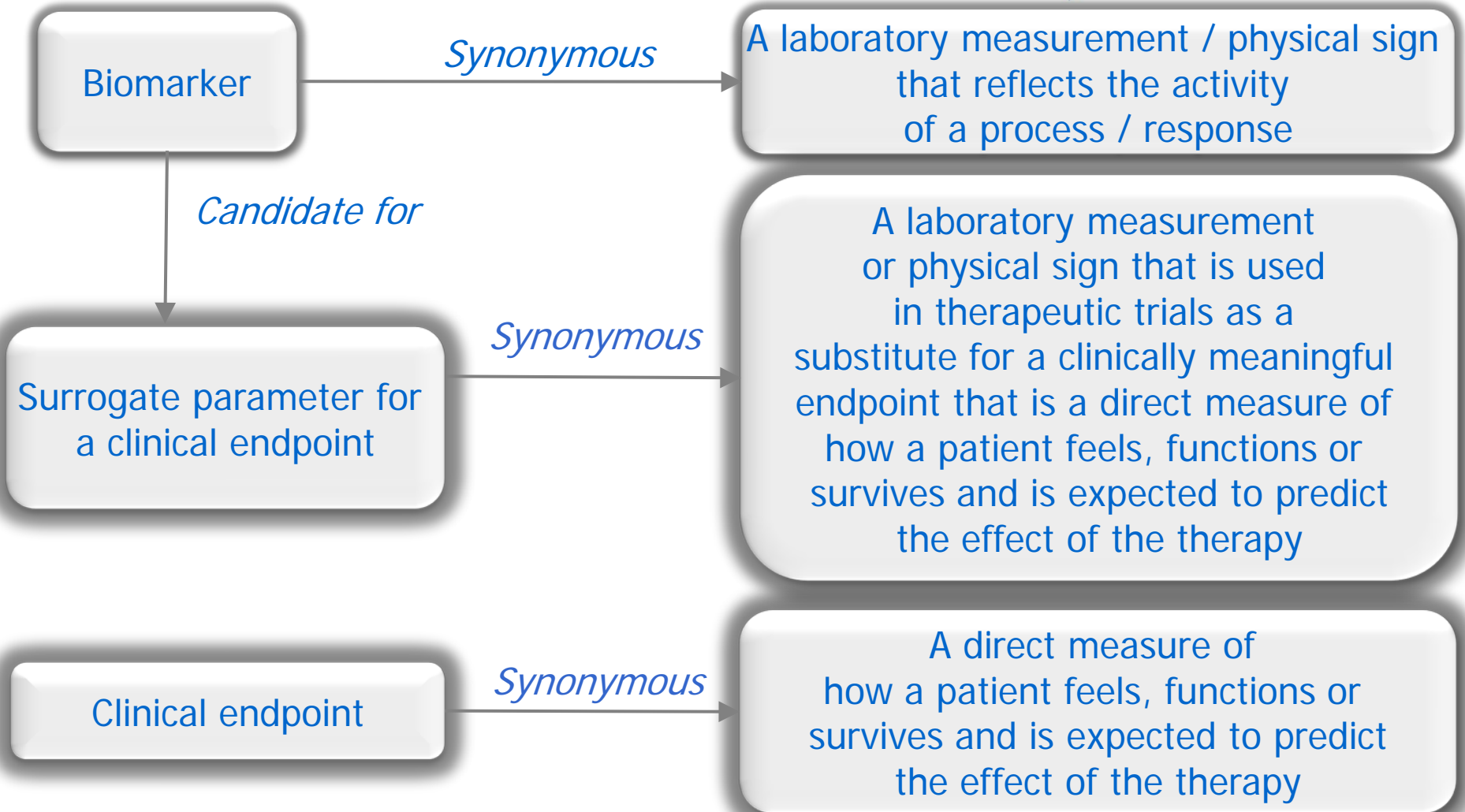
# Validation of pharmacodynamic methods and endpoints

Challenges, strategies and solutions depending on  
the type of endpoint

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# Definitions



# Biomarker qualification - NCEs



## Questions to be answered for biomarkers used in new drug development

- How can biomarker evidence help demonstrate that a candidate product is not too toxic to test in humans?
- How can biomarkers be used to select dose ranges for human initial testing?
- How can biomarkers be used most effectively to evaluate dose response in later trials?
- What biomarker evidence is appropriate to guide selection of patients for clinical testing?
- What types and levels of evidence are needed to accept a biomarker as a surrogate endpoint for product efficacy?

# Surrogate in NCEs



## Relevance of the surrogate in NCE development

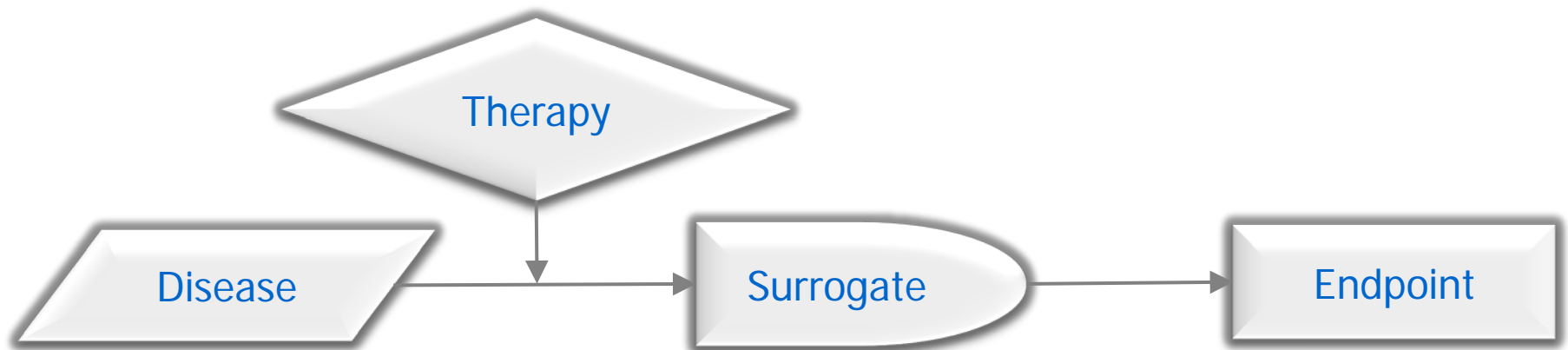
- shortens the development time
- is expected to allow prediction of clinical effect even though the drugs (and not only the exposure) are different
- often useful for Me-Toos
- difficult for "first-in-class" drugs

*" The difference between a surrogate and a true endpoint is like the difference between a cheque and cash. You can often get the cheque earlier, but then, of course, it may bounce."*

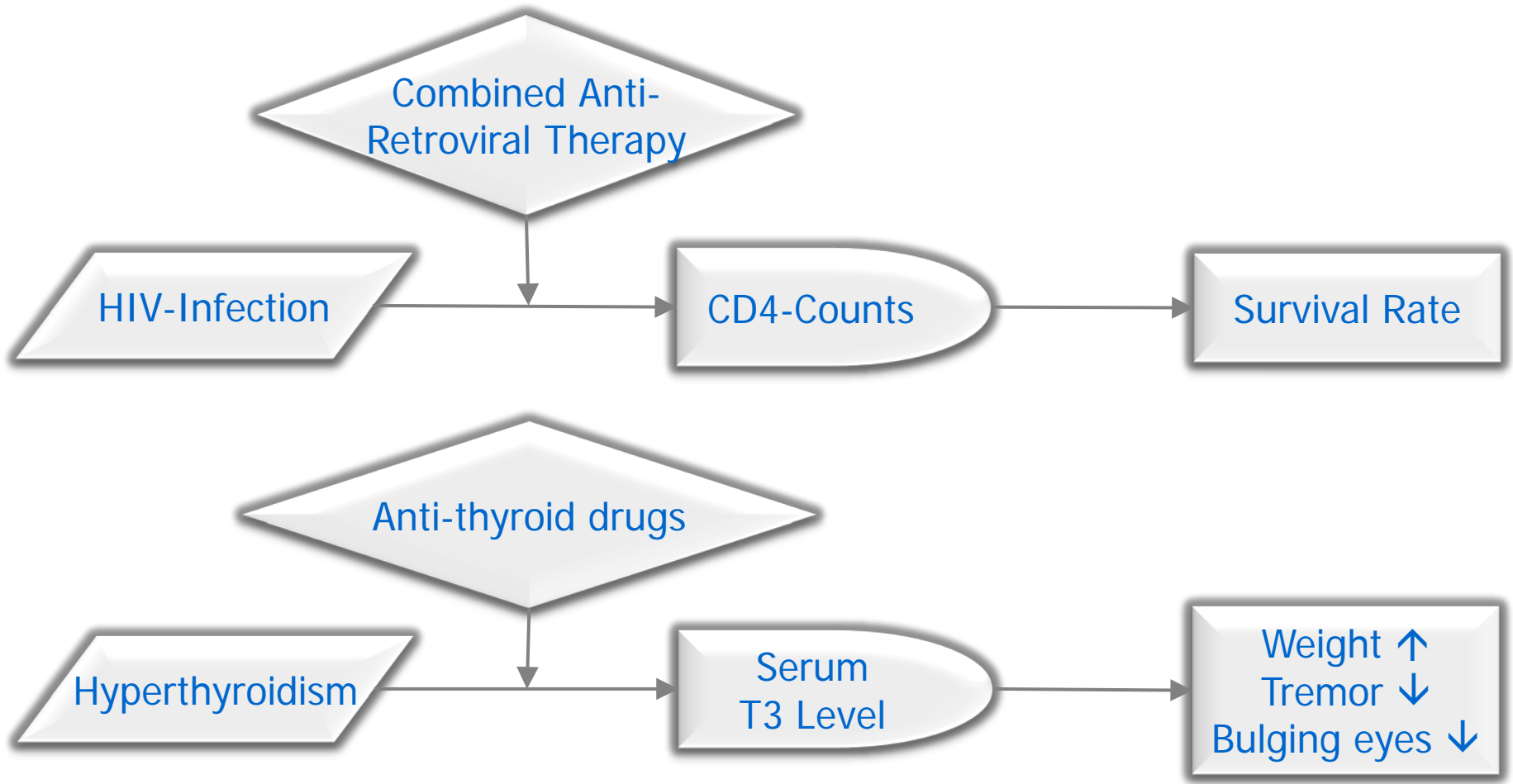
# Surrogate for clinical endpoint

## Validated surrogate parameters

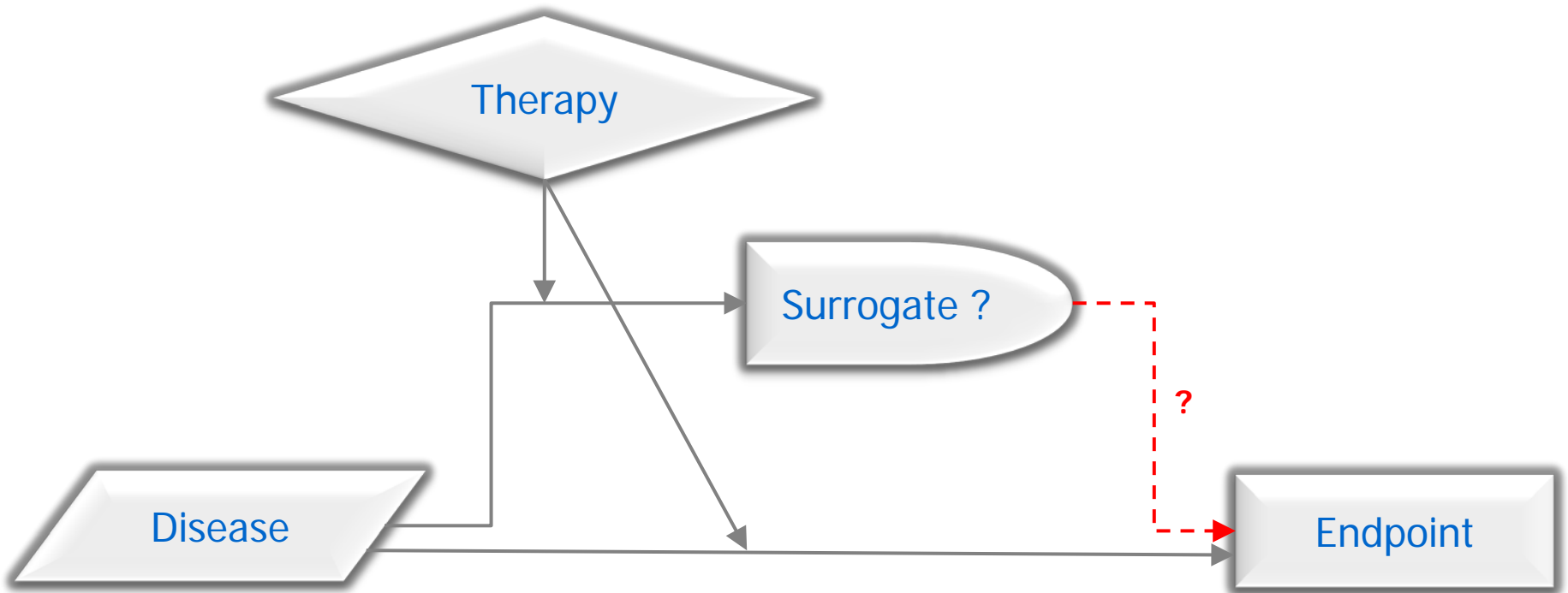
- a biomarker for which evidence has been established that a drug-induced effect on the surrogate predicts or results in the desired effect on the clinical outcome of interest



# Examples: surrogate parameters

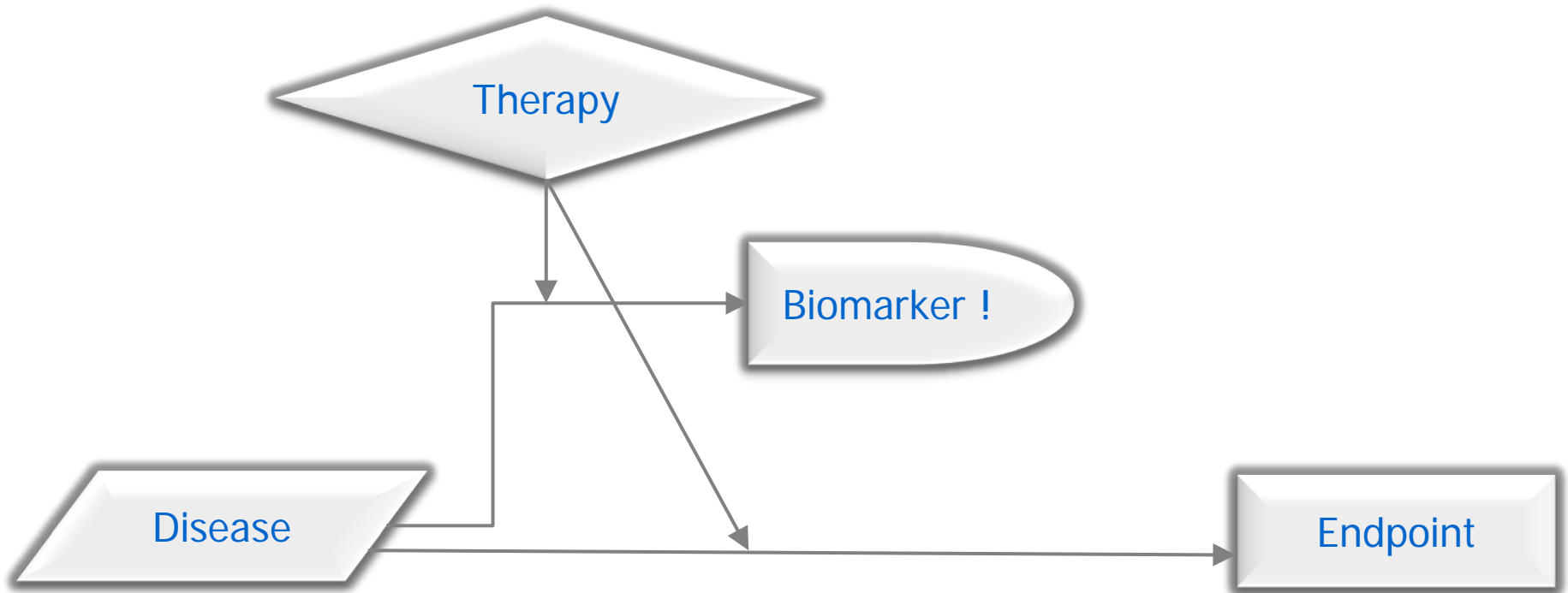


# Biomarker-to-Surrogate failure I



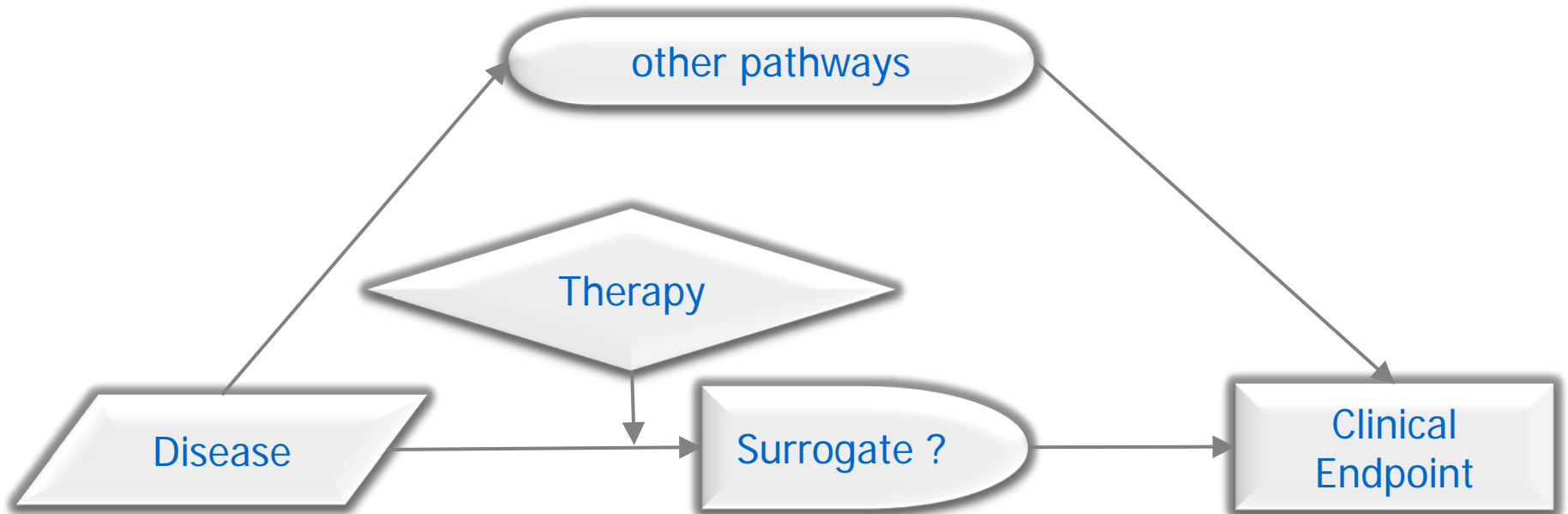
The surrogate parameter is not on the pathway

# Biomarker-to-Surrogate failure I

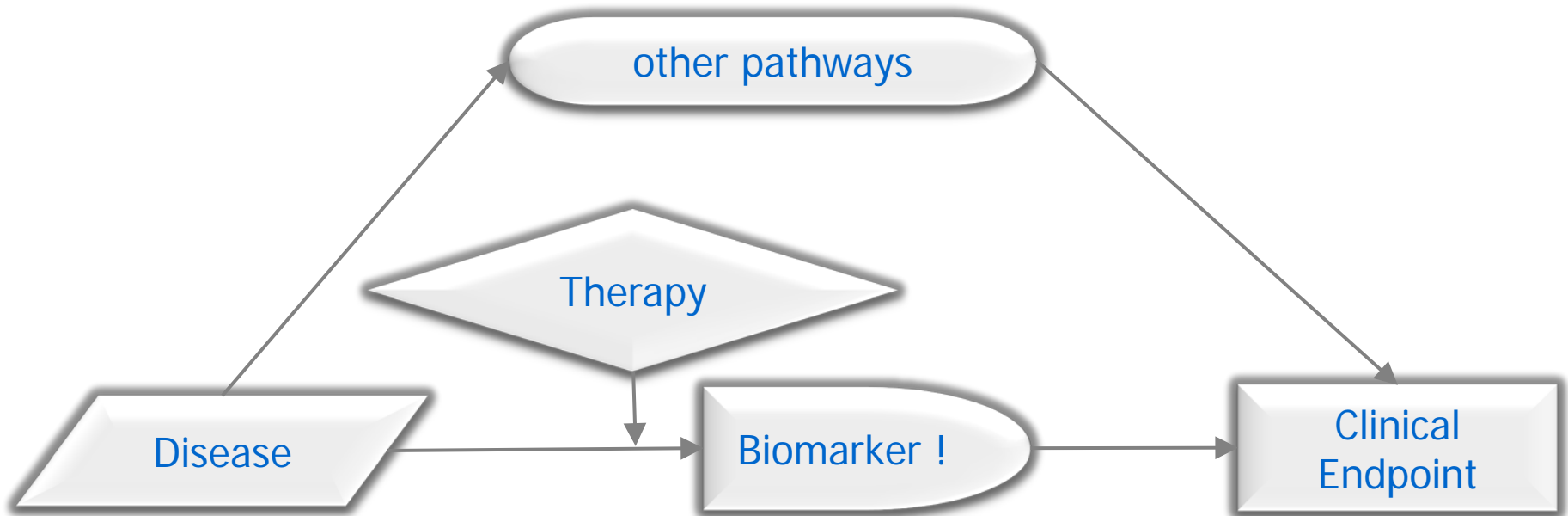




# Biomarker-to-Surrogate failure II

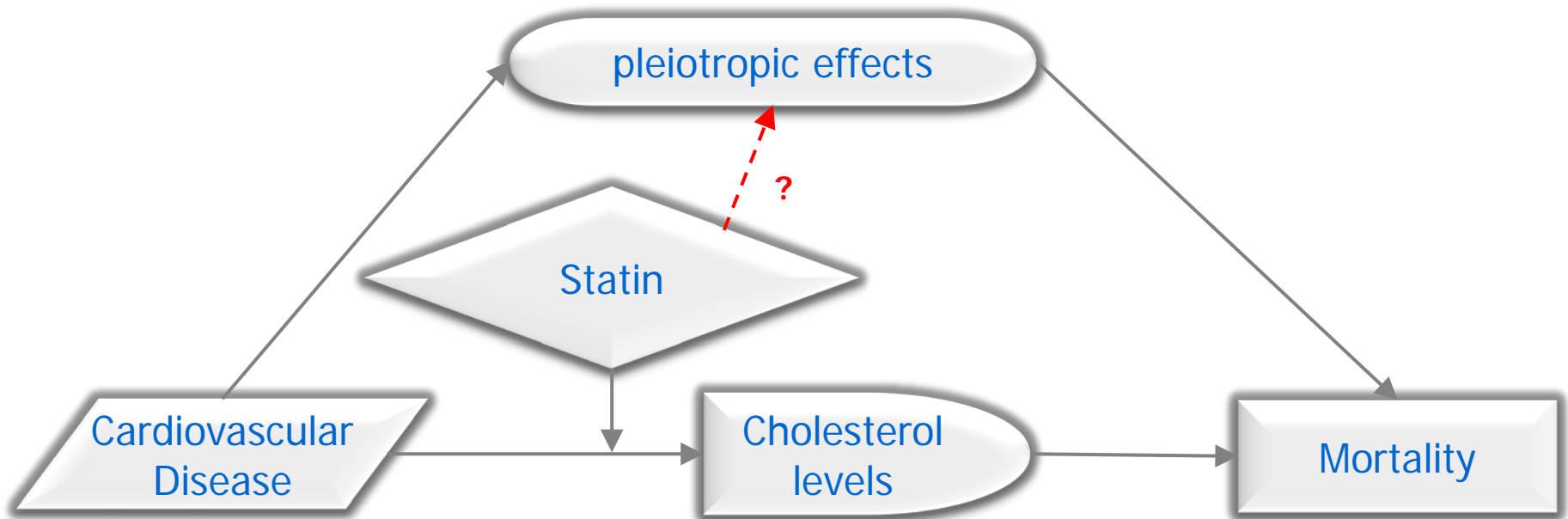


# Biomarker-to-Surrogate failure II



There are other relevant pathway(s) beside

# Surrogate parameters: Examples



Lowering cholesterol levels reduces mortality but other effects of statins may also contribute

# Biomarker qualification: generics



Questions to be answered for biomarkers to be used as surrogate for bioequivalence assessment

- Is the analytical / clinical method to be used for quantification adequately validated?
- Is the biomarker sensitive to drug concentration
  - at the site of action for locally acting drugs
  - in the systemic circulation for systemically acting drugs
- How to justify acceptance limits?

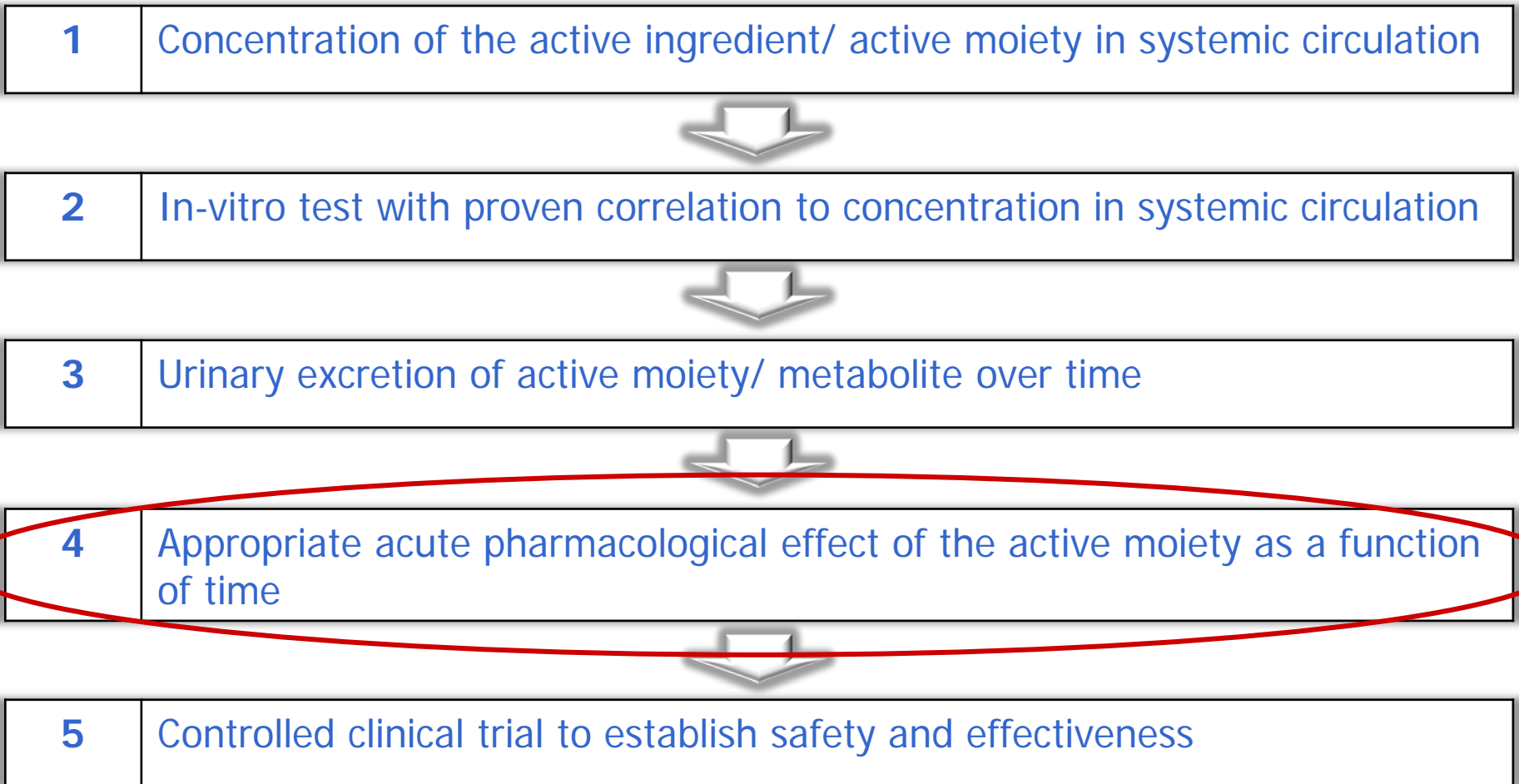
Note: The questions to be answered are completely different compared to the use as surrogate for the clinical endpoint

# Biomarker: the mathematicians view



- **binary (dichotomous)**: biomarker value below or above a certain threshold (e.g., CD4p counts over 500=mL) or clinical 'success' (e.g., tumor shrinkage);
- **categorical (polychotomous)**: biomarker value falling in successive, ordered classes (e.g., cholesterol levels <200mg=dL, 200–299mg=dL, 300p mg=dL) or clinical response (e.g., complete response, partial response, stable disease, progressive disease);
- **continuous (Gaussian)**: biomarker (e.g., log PSA level) or clinical measurement (e.g., diastolic blood pressure);
- **censored continuous**: time to biomarker below or above a certain threshold (e.g., time to undetectable viral load) or time to clinical event (e.g., time to cardiovascular death);
- **longitudinal or repeated measures**: biomarker (e.g., CD4 counts over time) or clinical outcome (e.g., blood pressure over time);
- **multivariate longitudinal**: several biomarkers (e.g., CD4 and viral load over time) or several clinical measurements (e.g., dimensions of quality of life over time).

# Preference cascade for BE assessment



# General requirements



All testing procedures regarding BE need to be

- sufficiently accurate
- sufficiently sensitive
- sufficiently reproducible

Sensitivity regarding product differences is expected to decrease

- from PK ...
- ... over PD ...
- ... to clinical endpoints

The approach of performing well-controlled clinical trials that establish the safety and effectiveness of a drug product is the least accurate, sensitive and reproducible one  
(FDA-position)

# Validation – analytical method



## (Bio-)analytically determined parameters

- Guideline on bioanalytical method validation (EMEA/ CHMP/ EWP/ 192217/2009)
- Workshop/ Conference Report – Quantitative bioanalytical methods validation and implementation: best practices for chromatographic and ligand binding assay (AAPS Journal 2007:9; Viswanathan et al), i. E. “White Paper”
- Guidance for Industry: Bioanalytical method validation, US-FDA 2001

Well-established principles for assessment of selectivity accuracy, precision, recovery, calibration curves, stability and – meanwhile – incurred sample analysis



# Locally acting/ locally applied



<b>Drug substance</b>	<b>Indication</b>	<b>Mechanism of action</b>	<b>BE-Surrogate</b>
Colestilan, aluminiumhydroxide, calcium carbonate, etc.	Hyperphosphatemia in patients with renal impairment	Phosphate binder (ion exchange resin or formation of insoluble salts)	Plasma/ serum phosphate levels
Cholestyramin	Hypercholesterinemia	Ion exchange resin for binding of anionic bile acids	Plasma/ Serum cholesterol levels
Acarbose	Diabetes mellitus type 2	Inhibition of $\alpha$ -glucosidase	Plasma / serum glucose and insulin levels
Orlistat	Obesity	Inhibition of pancreatic lipases	Faecal fat excretion

# Measurable biomarkers



## Non-PK analytical methods

- in the past it was very common to use clinical laboratory methods with a validation level applied to clinical chemistry
- meanwhile the requirements for such methods / laboratories have been extended to a GLP level based on the EMA-Reflection Paper
- method validation and quality control during measurements have to fulfil the criteria commonly applied to bioanalytical methods (sometimes difficult)

## Examples

- cholesterol, fat in faeces, phosphate, insulin, glucose, NO, CD4 counts etc.

Specificities of endogenous substances often rise problems

# Validation – others than PK-samples



## New regulations for all clinical trial samples

- requirements for the lab itself
  - organisation
  - personnel
  - contracts
  - trial conduct
  - patient/ subject protection and informed consent
  - chain of custody
- requirements regarding the analysis
  - method validation
  - repeat analysis
  - quality control

# Analysis of clinical trial samples



“Clinical trial samples means any biological sample collected from a participant in a clinical as required by the protocol. Samples may include but are not limited to: blood, plasma, serum, urine, faeces, tissues and cells.”

“The analysis of samples collected from subjects participating in clinical trials forms a key part of the clinical trials process. Sample analysis or evaluation provides important data on a range of endpoints which is used, for example, to assess the pharmacokinetic profile of investigational Medicinal products and to monitor their safety and efficacy. Consequently, it is essential that sample analysis or evaluation is performed to an acceptable standard which will ensure patient safety is not compromised and that data is reliable and accurately reported.”

# Non-analytical determination



## Example: skin blanching test for topical steroids

- systemic availability not relevant as product characteristic
- topical effects: correlation between potency/ local availability and vasoconstriction
- first published by Roger Williams (FDA) in 1992 proposing Stoughton-McKenzie vasoconstrictor assay

# Stoughton – McKenzie test



## General principles of the test

- pharmacology of (topical) corticosteroids
  - modification of function of dermal cells and leukocytes
  - interference with phospholipase A2 (arachidonic acid ↓, interleukin ↓)
  - anti-inflammatory, immunosuppressive, anti-mitogenic
  - and corticosteroids produce blanching/ vasoconstriction
- biomarker characteristic vasoconstriction depends on
  - potency of the drug substance
  - amount of drug delivered to the site of action
  - duration of exposure

But how to realise measurements?

# FDA – Guidance for Industry (1997)



## Accuracy, precision and sensitivity

- to be determined in the study population
  - analogously to bioanalytical assay
  - use of untreated controls as well as calibrators
  - different potency classes / modification of dose duration
- ➔ Effect is population dependent (responders !)
- use of human observer: technically “old-fashioned”
- commercially available chromameter/ colorimeter
- nowadays: digital imaging techniques considered
- ➔ EMA still recommends visual or chromameter - based methods

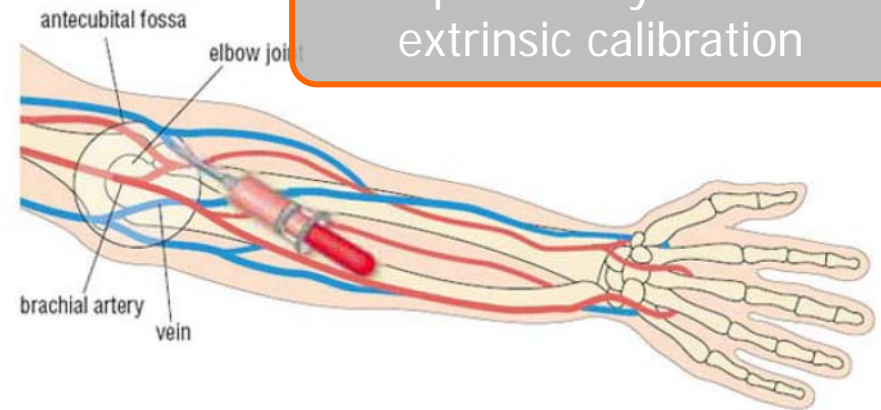
# Pivotal study

## Design depends on data from pilot study

- duration commonly 0,25 to 6 hours
- $D_1 \approx 0,5 * ED_{50}$ ;  $D_2 \approx 2 * ED_{50}$

## General procedures

- exposure to the arm, skin sites not closer than 3-4 cm to the antecubital fossa or to the wrist
- untreated control sites on each arm
- measurements at various times over 24h
- dose duration – response data should be modelled (either nonlinear mixed effect modelling method or a naive pooled data method)  $\Rightarrow ED_{50}$
- $ED_{50}$  value serves as approximate dose duration for BE comparison





# FDA – Guidance for Industry (1997!)

## Study design for validation

### ■ pilot dose duration – response study

- conducted with reference only
- application of  $E_{\max}$ -model

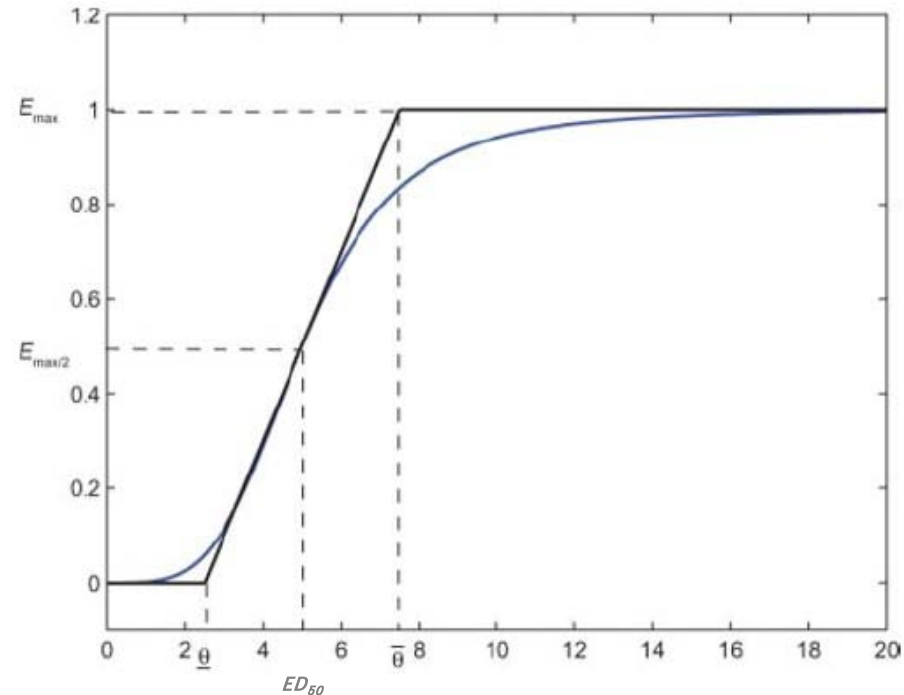
$$E = E_0 + E_{\max} * d / (ED_{50} + d)$$

$E_0$  baseline effect

$E_{\max}$  maximal effect

$D$  dose at  $ED_{50}$

$ED_{50}$  half-maximal effect



Intention: The drugs shall be tested in the steep ( $\triangleq$  linear) part of the sigmoidal  $E_{\max}$  – model in order to end-up with a good discriminatory potency  $\Rightarrow$  linearity of the assay

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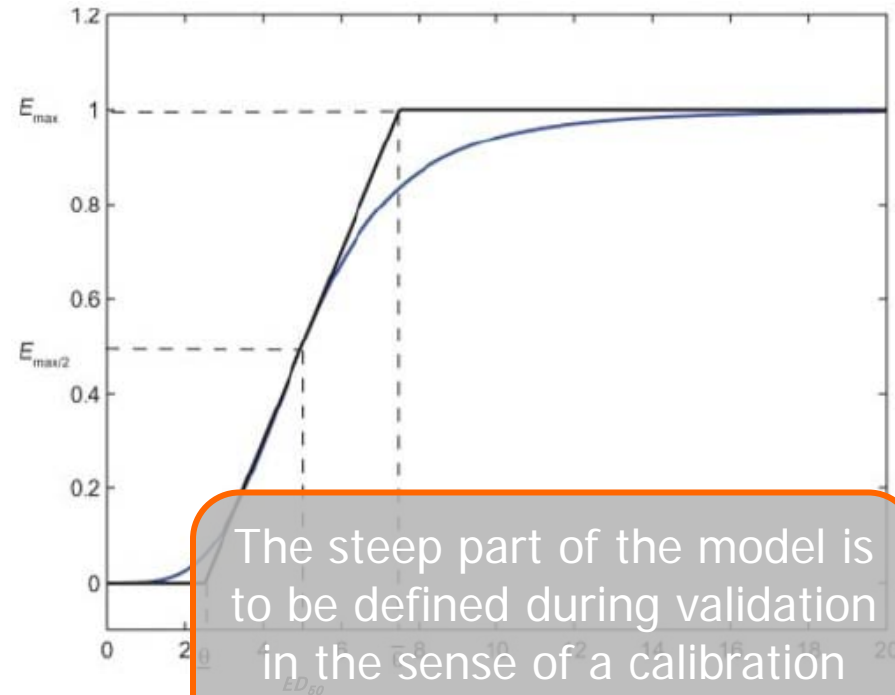
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The steep part of the model is to be defined during validation in the sense of a calibration range

Intention: The drugs shall be tested in the steep ( $\triangleq$  linear) part of the sigmoidal  $E_{\max}$  – model in order to end-up with a good discriminatory potency  $\Rightarrow$  linearity of the assay

# Statistical analysis



## Data structure

- baseline adjusted data have to be used...
- ...resulting in both positive and negative data

## Statistical method for evaluation

- Locke s method for determination of the exact confidence interval from untransformed data
- details are given in Guidance for Industry

“The office of generic drugs has not determined at this time equivalence interval for bioequivalence. The Office recognizes that an equivalence interval wider than 80-125 % as a public standard, may be necessary pending evaluation of data submitted to the agency” (1997)

# Statistical analysis



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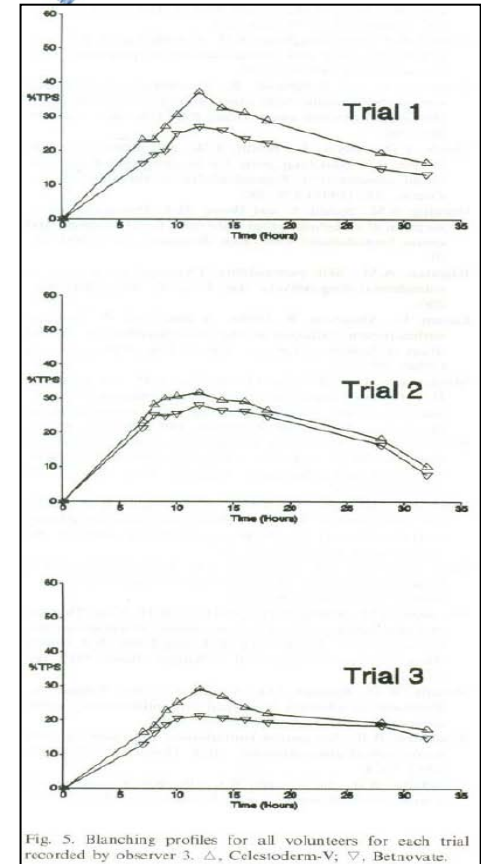
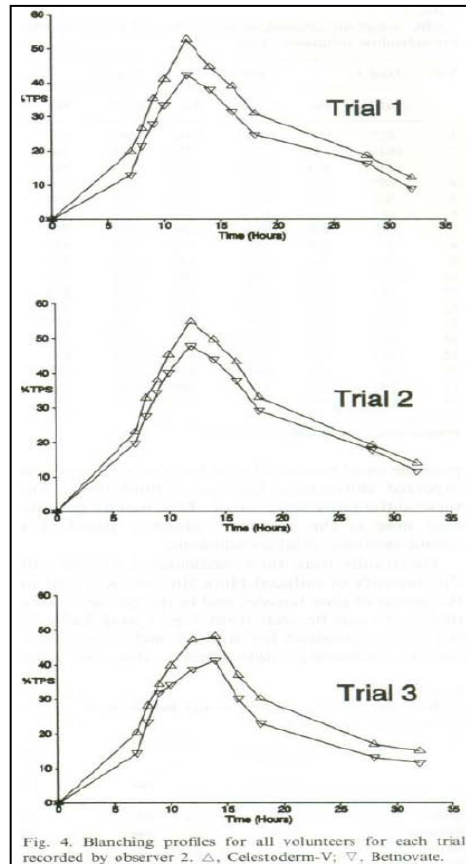
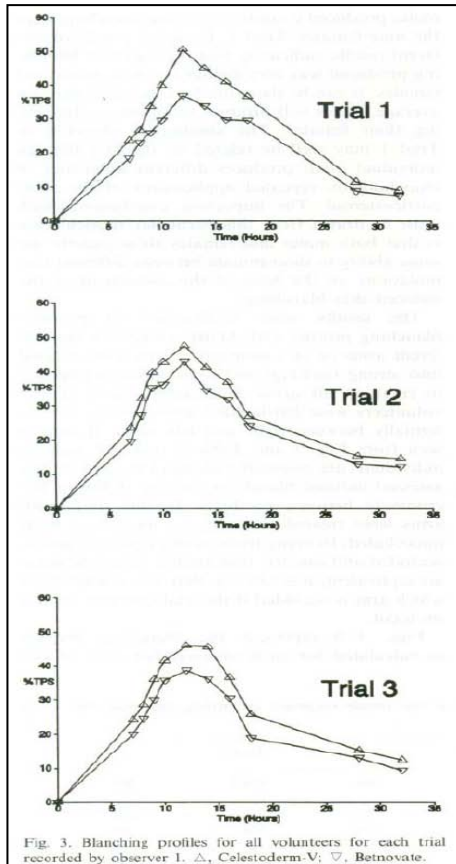
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Later data show that 80-125 % can be met with acceptable effort

"The office of generic drugs has not determined at this time equivalence interval for bioequivalence. The Office recognizes that an equivalence interval wider than 80-125 % as a public standard, may be necessary pending evaluation of data submitted to the agency" (1997)

# Subjective method



Blanching profiles for all volunteers for each trial recorded by three different observers with identical test and reference products, identical subjects and identical application sites (visual assessment)

# Subjective method

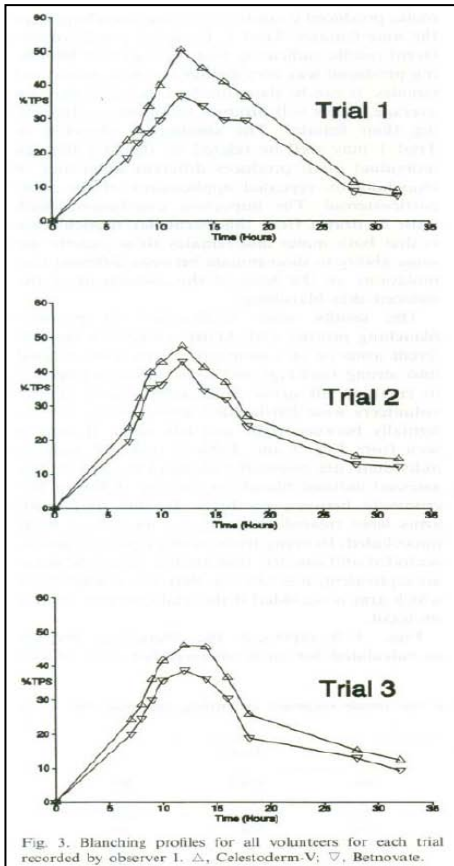


Fig. 3. Blanching profiles for all volunteers for each trial recorded by observer 1.  $\Delta$ , Celestoderm-V;  $\nabla$ , Betnovate.

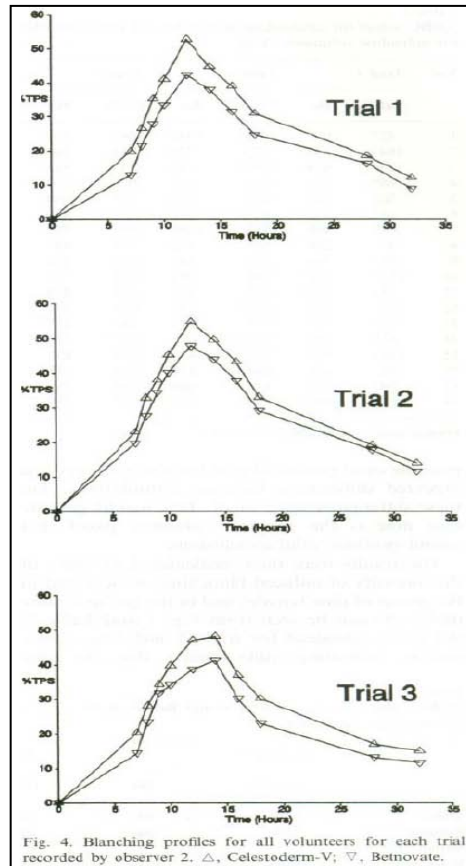


Fig. 4. Blanching profiles for all volunteers for each trial recorded by observer 2.  $\Delta$ , Celestoderm-V;  $\nabla$ , Betnovate.

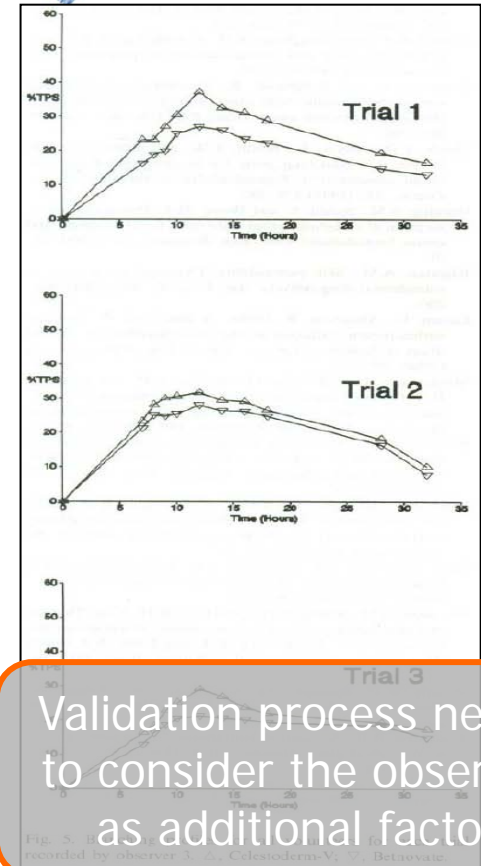


Fig. 5. Blanching profiles for all volunteers for each trial recorded by observer 3.  $\Delta$ , Celestoderm-V;  $\nabla$ , Betnovate.

Blanching profiles for all volunteers for each trial recorded by three different observers with identical test and reference products, identical subjects and identical application sites (visual assessment)

# Data are highly method dependent II

## Comparison of visual assessment and chromameter

	<b>Confidence Interval Visual assessment</b>	<b>Confidence Interval Chromameter</b>
"detectors" acc to FDA definition (n=23)	99.3-111.6 %	86.5-129.3 %
all subjects (n=34)	97.9-109.2 %	90.2-120.7 %

Validation includes the  
population characteristics

Validation includes the  
method of quantitation

# Equivalence surrogate safety / efficacy



## Inhaled corticosteroids result in

- reduced inflammation of the airways
  - to be determined by e.g. exhaled NO
- hypothalamic-pituitary axis depression
  - to be determined by quantitation of cortisol suppression

## Both methods require different types of “validation”

- validation of the sensitivity of the assays regarding adequate detection of product differences
- validation of the sample handling for NO
- validation of the analytical methods for quantitation of NO and cortisol



# Validation of the biomarker FENO



## FENO $\triangleq$ Fractional Concentration of Exhaled Nitric Oxide

- inducible NOsynthase (iNOS) is increased in airway inflammation
- FENO is increased in (some!) asthma patients
- iNOS is expressed in the respiratory epithelium as response to cytokines from macrophages and lymphocytes
- corticosteroids modulate expression of iNOS

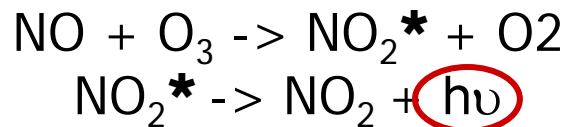
FENO measures mainly inflammation whereas other parameters as e.g. FEV<sub>1</sub> characterise obstruction

## Questions to be answered

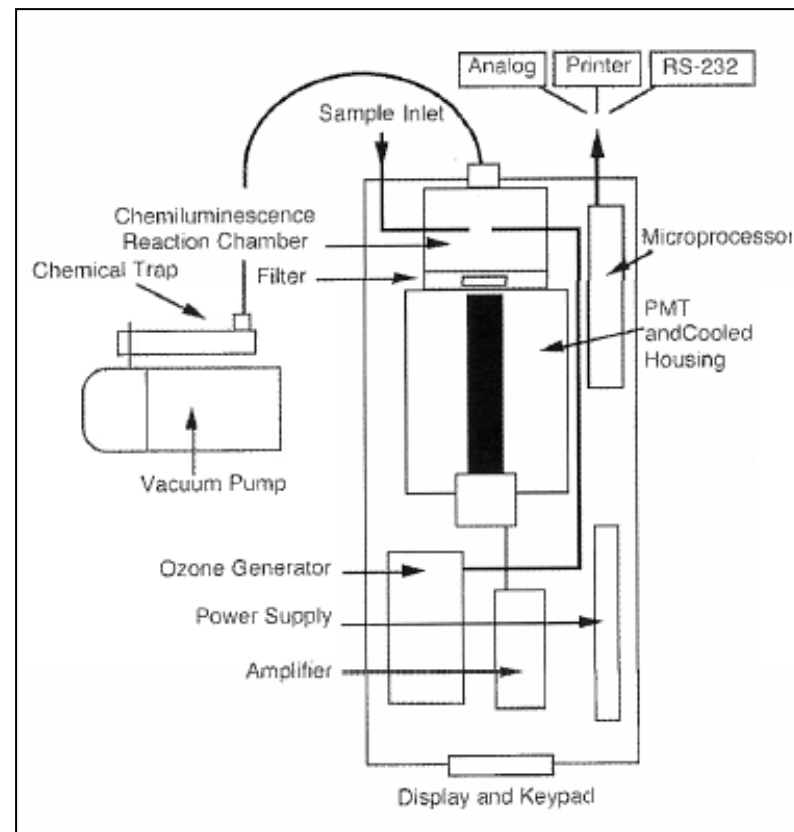
- population characteristics?
- dose – response?
- reproducibility?
- acceptable  $\Delta$ ?

# Analytical determination of NO

## Gas-based chemi-luminescent reaction



Detection by a red-sensitive photo-multiplier tube



Schematic presentation of Sievers Nitric Oxide Analyzer NOA 280i for research purposes

# Validation of the analytical method



## Specifications according to operation manual

- sensitivity: 1 ppb
- range: < 1 – 500,000 ppb
- response time: 67 msecs (lag time 1 sec.)
- repeatability: 5 %
- sample size: 10 – 300 ml/ min

## Calibration for measurements

- recommended: once daily, as dependent on ambient temperature, humidity, flow, etc.
  - measurement of "zero air" (background signal to be subtracted)
  - measurement of known concentration typically a gas containing 10 to 100 ppm
- ➔ analyzer automatically calculates the response for the ppm-range

The steps to be realised according to the manual do not cover the requirements of the EMA-guideline for bioanalytical measurements!

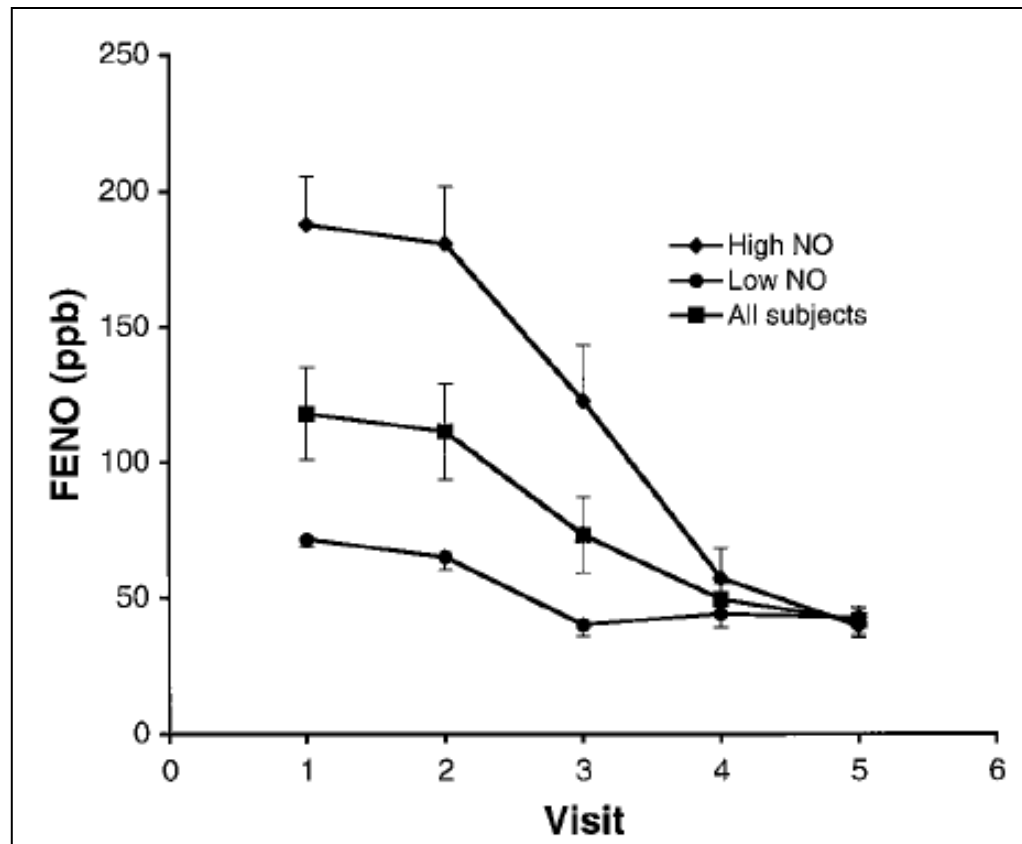
# Adequate validation?

## Additional measurements needed

- further data to be provided by manufacturer ?
- additional pre-study validation using calibrator gases covering the analytical range ?
- additional daily re-calibrations ?

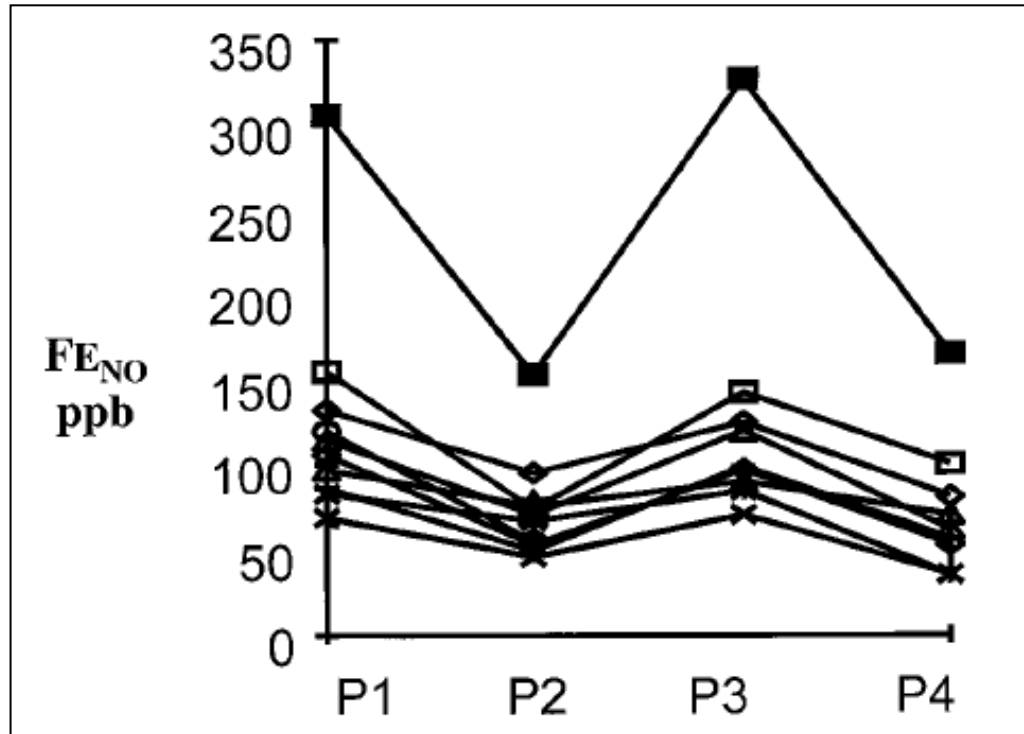
Meaningful validation procedure needs to be established and justified!

# Population characteristics



Change in FENO at each visit corresponding to baseline, placebo treatment and increasing doses of inhaled budesonide proprionate (100 µg/d; 400 µg/d; 800 µg/d)

# Reproducibility



Change of FENO after 2 days treatment in 4 periods separated by wash-out periods (200 µg/d)

Open question: acceptance criteria for equivalence assessment?

# Conclusion



## Selection and validation of BE surrogates

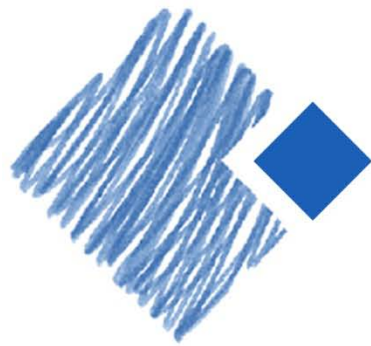
- general suitability of the parameter:
  - correlation with concentration at the site of action
  - reproducible
- selection of adequate range of the method
  - ability to discriminate between products
- validation of the method for determination
  - “classical” bioanalytical method validation or
  - validation of all critical parameters of the method

## Adequate quality control during measurements

- adequate calibration
- adequate QC-samples

## Acceptance criteria

- 80.00 – 125.00 %
- or clinically justified margins



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# Concepts in Drug Research and Development

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