EXPEDITED CLINICAL PROGRAMS AND STUDY DESIGNS FOR OA STRUCTURE MODIFYING THERAPIES

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Editor-in-Chief, Osteoarthritis & Cartilage





In the last 12 months, I have had the following relationships related to OA research:

Nature of Financial Relationship				
1. Commercial Interest	2. What Was Received	3. For What Role		
Novartis, Pfizer, Abbvie, Jannsen, TissueGene	Research Funds	Clinical Trials		
Daiichi-Sankyo, Agios, Omeros	Royalties	Intellectual Property: Cell lines		
Zynerba Pharma, Inc., GlaxoSmithKline, Inc. Medivir Inc	Consulting Fees: OA Therapeutics	Consultant		
Discgenics, Inc	Consulting Fees	DSMB		
** Osteoarthritis Research Society International	Stipend	Editor-in-Chief, Osteoarthritis and Cartilage		

** Not Commercial

Background

- OA is a slowly progressive process, with years (decades) of subclinical activity prior to presentation of symptomatic disease.
- There are no treatments or therapeutic strategies that have been shown to alter the progression of disease in humans
- It is widely believed (and repeatedly published) that "to develop effective therapeutics, predictors & markers of progression are necessary"

Background: OA Biomarkers

US FDA Fast track for accelerated approval (Part 312, subpart E (21 CFR part 312)) requires:

 qualifying criteria : "<u>a drug that treats a serious condition</u> and generally provides a meaningful advantage over available therapies and demonstrates an effect on a surrogate endpoint that is reasonably likely to predict clinical benefit ..."

Background

<u>"FDA recognizes that OA can be a serious disease</u> with an unmet medical need for therapies that modify the underlying pathophysiology of the disease and potentially change its natural course to prevent long-term disability."

> US FDA Draft Guidance, Aug 2018, "Osteoarthritis: Structural Endpoints for the Development of Drugs, Devices, and Biological Products for Treatment Guidance for Industry"

Background: OA Biomarkers

US FDA Fast track for accelerated approval (Part 312, subpart E (21 CFR part 312)) requires:

qualifying criteria : "a drug that treats a serious condition and generally provides a meaningful advantage over available therapies and demonstrates an effect on a *surrogate endpoint* that is reasonably likely to predict clinical benefit ..."

OA Biomarkers: History



How far have we come, and Where do we need to go?

Today, our job is to:

1. Define the status of surrogate structural markers in OA

(What are the meaningful data re: OA surrogate markers - soluble and imaging?)

- 2. Discuss what it takes to demonstrate structural benefit. (Are we now ready for evidence-based endpoints? If not, what do we need?)
- 3. Consider what is required after approval to prove clinical benefit. (What needs to be demonstrated to convince the Agency of a meaningful structure modifier?)

The Alternatives



Received via US Mail 5/13/2019



Chicago Tribune: 4/12/2018

Meeting Agenda

9:00 – 9:15 AM	Welcome and Overview	Joel Block, MD	
9:15 - 9:45 AM	Impact of OA	Tuhina Neogi, MD, PhD Leigh Callahan, PhD Ranay Collins Denise Marksberry	
9:45 - 10:00 AM	Group discussion	Jeffrey Katz, MD - Moderator	
10:00 - 10:15 AM	Break		
10:15 - 10:45 AM	Current status imaging biomarkers	Philip Conaghan, MD, PhD	
10:45 - 11:00 AM	Current status soluble biomarkers for OA	OA Virginia Kraus, MD, PhD	
11:00 - 11:30 AM	Group discussion	Joel Block, MD - Moderator	
11:30 - 12:00 PM	Applying biomarkers for accelerated approval of OA structure modifying drugs	Nikolay Nikolov, MD	
12:00 - 12:30 PM	Group discussion	Marc Hochberg, MD, MPH - Moderator	

Meeting Agenda (continued)

12:30 - 1:15 PM	Lunch	
1:15 – 2:15 PM	Post approval study designs for drugs approved on the basis of a surrogate endpoint in OA	Lee Simon, MD
2:15 - 3:30 PM	Group discussion	Philip Conaghan, MD, PhD Moderator
3:30 – 3:45 PM	Final comments	Joel Block, MD

IMPACT OF OA PANEL DISCUSSION

Tuhina Neogi, MD, PhD

Leigh Callaghan, PhD

Ranay Collins

Denise Marksberry

BURDEN OF OSTEOARTHRITIS

Tuhina Neogi, MD, PhD, FRCPC Professor of Medicine and of Epidemiology Boston University School of Medicine and School of Public Health



Disclosures

- EMD Merck-Serono
- Novartis
- Pfizer/Lilly
- Regeneron

Osteoarthritis Epidemiology

302 million

Joint Site	Radiographic OA	Symptomatic OA
Knee	20-30%	5/10-20%
	African Americans	Whites
2	52.4%	36.2%

Incidence of OA



Age Group (Years)



Prevalence of Pain at Selected Body Sites



Percent of adult population (age ≥18)

Chronic Pain: Most of it is OA and Back Pain



*Estimated projections.

Decision Resources. Chronic Pain. November 2011.

Chronic Pain is More Prevalent and Costly than other Common Diseases





Prevalence, Millions

Prevalence of MSK Diseases

1 in 2 (127 million) adults are affected, twice the rate of chronic heart and lung diseases

Proportion of United States Population Reporting Chronic Medical Conditions, 2012



National Center for Health Statistics, National Health Interview Survey, 2012

Clinical Knee Osteoarthritis



Osteoarthritis Clinical Course

Musculoskeletal diseases are now the 2nd most common cause of years lived with disability worldwide

Burden to Health Care System

- Joint Pain and Arthropathies are #1 reason for outpatient visits (NACMS 2015)
- OA was 3rd most common reason for hospitalizations (NIS 2015)
 - 921,000 hospitalizations
- Knee replacement surgery: 97% for knee OA
 - 3.5 million by 2030

Includes hospital discharges, ED, outpatient, and physician visits.
Includes only hospital discharges and ED visits.
Source: National Center for Health Statistics, NHDS, NAMCS, 2010.



Scope of the OA Problem





Lack of Effective Therapies Disability Quality of Life Opioid Epidemic

Urgent Need for More Options

Symptom management alone is insufficient Need therapies to address the underlying disease pathology





BURDEN OF OSTEOARTHRITIS: COMORBIDITY AND MORTALITY

Leigh F. Callahan, PhD Mary Link Briggs Distinguished Professor of Medicine Associate Director, Thurston Arthritis Research Center University of North Carolina, Chapel Hill

OA and Comorbidity

- People with OA have on average 2.6 moderate-to-severe comorbidities
- 31% of people with OA have five or more other chronic conditions



Between 59 and 87% of people with OA have at least one other chronic condition, especially cardiovascular disease, diabetes and high blood pressure

23.7 MILLION

making it difficult to complete daily tasks like getting the mail, groceries and cleaning.



Over half of these adults are under age 65 (13.8 million).

OA accounts for 2.4% of all years lived with disability (YLD)

I U H LEADING CONTRIBUTOR TO GLOBAL YLD

PAIN FROM ARTHRITIS IS ONE OF THE KEY BARRIERS TO MAINTAINING PHYSICAL ACTIVITY

Inactivity makes it harder to manage obesity, diabetes and heart disease.

59%-87% of adults with OA have at least one other significant chronic condition with the most common being cardiovascular disease, diabetes and hypertension.



Around 60% of adults with OA also have obesity.



MORTALITY IS HIGHER AMONG THOSE WITH OA THAN IN THE GENERAL POPULATION

OA and Comorbidity

- The presence of comorbidities in older adults with OA is associated with more pain and greater limitation in activities of daily living
- Comorbidities may have a significant impact on choice and tolerance of treatments

OA and Comorbidity: Cardiovascular Disease



- CVD affects 1 in 3 American adults as the most common cause of death in the Western World
- 61% of people awaiting total knee replacement surgery have CVD
- In primary care, patients with hip and knee OA have twice the rate of CVD
- In people with established CVD, OA is associated with worse physical health and increased burden of symptoms

Mozaffarian, D; 2015 Calvet, J: 2015

OA and Comorbidity: Diabetes

- DM affects approximately 11% of American adults
- People with OA have a 32% increased risk of developing diabetes over a 12-year period
- OA and DM have shared risk factors: older age and obesity
- Walking difficulty is an independent risk factor for developing DM
- OA may impair the ability to exercise and lose weight

Lipscombe, L; 2017 Piva, S; 2015 Tuominen, U; 2007 Hawker, G; 2016 Rahman, M; 2014

PREDIABETES AND ARTHRITIS

84 MILLION US ADULTS have prediabetes (33%)

54 MILLION US ADULTS have arthritis (23%)

42% of adults with diabetes have arthritis 13 million persons 1 in 3 U.S. Adults (26 million)

with **prediabetes** also have **arthritis**.

OVER 50% OF ADULTS

with **arthritis** and **prediabetes** are **inactive** and have **obesity**.

Arthritis can hinder the ability of adults with prediabetes to engage in physical activity. This may increase risk for type-2 diabetes.

Increasing physical activity and promoting weight loss can reduce risk for type 2 diabetes and improve pain management among adults with **prediabetes and arthritis**. OSTEOARTHRITIS

WWW.OAACTION.UNC.EDU

OA and Comorbidities Conclusion

- Increased risk of comorbidities in patients with OA
- The comorbidities effect treatment choices
- Comorbidities in OA may be associated with poor outcomes



TABLE 2.Meta-analyses of Osteoarthritis on Mortality

		Number of studies	_ Definition of OA	Estimate of effect (HR, OR, or SMR)	
Year	Author			All-cause mortality	CVD-specific mortality
2016	Veronese [15]	7 Any OA 4 CVD-specific any OA 3 Knee OA	Clinical and/or radiologic assessment of hand, hip and knee OA	Any OA: HR = 1.10 (0.97-1.25) Hip OA: HR = 1.08 (0.92-1.26) Knee OA: HR = 1.21 (0.82-1.78)	
		2 Hip OA 3 Hand OA		Hand OA: $HR = 0.91(0.79-1.04)$	Any OA: HR = 1.21 (1.10-1.34)
2016	Xing [17]	7 Symptomatic OA 6 Radiographic OA	Radiographic hand, knee, hip or spine; with or without symptoms	Symptomatic OA HR = 0.91 (0.68-1.23) Radiographic OA HR = 1.13 (0.95-1.35)	
2017	Han [16]	13 Any OA 5 CVD-specific any OA 6 Any rOA 5 Any sxOA 6 Knee OA 4 Hip OA 4 Hand OA	Hip, knee, spine, hand	Any OA: HR = 1.06 (0.88-1.28) Any rOA: HR = 1.24 (1.01-1.53) Any sxOA: HR = 0.95 (0.68-1.33) Knee OA: HR = 1.24 (0.87-1.76) Hip OA: HR = 1.06 (0.77-1.20) Hand OA: HR = 1.01 (0.89-1.14)	Any OA: HR = 1.36 (1.10-1.69)
IPD m	eta-analysis				
2016	PCCOA White Paper [18]	Knee sxOA: 3 US cohorts 2 ROW Hip pain: 2 US cohorts 2 ROW	Symptomatic knee rOA; hip pain	Knee sxOA: US: HR = 1.23 (1.07-1.42) ROW: HR = 0.72 (0.39-1.35) Hip pain: US: HR = 1.20 (1.04-1.37) ROW: HR = 0.99 (0.87-1.10)	

Kaplan, Meier survival curves for mortality by baseline knee rOA and/or knee pain group



Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, OAC: 27; 593-602, 2019

Kaplan, Meier survival curves for mortality by baseline knee rOA and/or knee pain group



Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, OAC: 27; 593-602, 2019

All-cause Mortality

HR[§] (95% CI) for All-Cause Mortality



[§]Adjusted for enrollment wave, age, sex, race, education, knee injury, cancer, non-steroidal anti-inflammatory drugs, hypertension, smoking, liver disease, alcohol use, depression, physical activity, BMI, diabetes, cardiovascular disease

Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, OAC: 27; 593-602, 2019
All-cause Mortality, Stratified by Sex



[§]Adjusted for enrollment wave, age, race, education, knee injury, cancer, non-steroidal anti-inflammatory drugs, hypertension, smoking, liver disease, alcohol use, depression, physical activity, BMI, diabetes, cardiovascular disease

Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, OAC: 27; 593-602, 2019

All-cause Mortality, Stratified by Race



[§]Adjusted for enrollment wave, age, sex, education, knee injury, cancer, non-steroidal anti-inflammatory drugs, hypertension, smoking, liver disease, alcohol use, depression, physical activity, BMI, diabetes, cardiovascular disease

Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, OAC: 27; 593-602, 2019

All-cause Mortality, Stratified by Age



[§]Adjusted for enrollment wave, age, sex, race, education, knee injury, cancer, non-steroidal anti-inflammatory drugs, hypertension, smoking, liver disease, alcohol use, depression, physical activity, BMI, diabetes, cardiovascular disease

OAC:Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, 27; 593-602, 2019

All-cause Mortality, Stratified by Obesity

HR[§] (95% CI) for All-Cause Mortality



[§]Adjusted for enrollment wave, age, sex, race, education, knee injury, cancer, non-steroidal anti-inflammatory drugs, hypertension, smoking, liver disease, alcohol use, depression, physical activity, diabetes, cardiovascular disease

Cleveland, Alvarez, Schwartz, Losina, Renner, Jordan and Callahan, OAC: 27; 593-602, 2019

Cardiovascular Mortality in Patients with Knee OA



Fig. 1. Cardiovascular mortality in patients with knee OA as compared to the general population, by sex - adjusted hazard ratios with 95%CI from Cox regression model during 3 periods of the follow-up time. *CVD – cardiovascular diseases, IHD – ischemic heart diseases, MI – myocardial infarction.

Cardiovascular Mortality in Patients with Hip OA



Fig. 2. Cardiovascular mortality in patients with hip OA as compared to the general population, by sex - adjusted hazard ratios with 95%CI from Cox regression model during 3 periods of the follow-up time. *CVD – cardiovascular diseases, IHD – ischemic heart diseases, MI – myocardial infarction.

OA and Mortality Conclusion

- Increased all-cause and CVD mortality has been noted in individuals with knee pain and symptomatic knee OA compared to the general population
- Increased all-cause and CVD mortality has been noted in individuals with hip pain or hip OA compared to the general population
- Increased CVD mortality has been noted in individuals with any OA compared to the general population







OA Disease Progression: Current status of imaging biomarkers

Philip Conaghan MBBS PhD FRACP FRCP

Director, Leeds Institute of Rheumatic & Musculoskeletal Disease, University of Leeds

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Leeds, United Kingdom

The Leeds Teaching Hospitals NHS Trust





Disclosures

Advisory boards or speakers bureaus for:

 AbbVie, BMS, EMD Serono, Flexion, Galapagos, GSK, Lilly, Novartis, Pfizer, Samumed



This presentation

- Focus on knee OA
- Focus on most advanced MRI quantitative endpoints: cartilage thickness, bone shape (not detailed review), especially predictive validity for patient important outcomes
- Heterogenous disease but....understanding of multiple tissue relationships has got better
- Structure-pain understanding is improving
- Suggest a new way of thinking about OA progression based on imaging of structure



X-ray lessons



X-ray positioning





Hunter DJ et al Osteoarthritis Cartilage 2015

Location specific JSW







Summary and recommendations of the OARSI FDA osteoarthritis Assessment of Structural Change Working Group

P.G. Conaghan †‡*, D.J. Hunter §||, J.F. Maillefert ¶#††, W.M. Reichmann ‡‡§§, E. Losina ‡‡§§

Osteoarthritis and Cartilage 23 (2015) 698-715

Osteoarthritis and Cartilage



Review

OARSI Clinical Trials Recommendations: Knee imaging in clinical trials in osteoarthritis



D.J. Hunter † ‡ *, R.D. Altman §, F. Cicuttini ||, M.D. Crema ¶ #, J. Duryea ††, F. Eckstein ‡‡ §§, A. Guermazi ¶, R. Kijowski || ||, T.M. Link ¶¶, J. Martel-Pelletier ##, C.G. Miller †††, T.J. Mosher ‡‡‡ §§§, R.E. Ochoa-Albíztegui || || ||, J.-P. Pelletier ##, C. Peterfy ¶¶¶, J.-P. Raynauld ##, F.W. Roemer ¶ ###, S.M. Totterman ††††, G.E. Gold ‡‡‡‡ §§§§ || || ||

OARSI OA Knee Trial Recommendations: X-rays

- The use of fluoroscopic positioning and semi-flexed views improves responsiveness, although ... access to fluoroscopic facilities is restricted
- Studies will generally need to be at least 12 and more likely 24 months duration
- The IMD of the tibial plateau should not change between visits, and ideally should be no more than 1.5 mm
- It is advisable to "enrich" a knee OA study population to increase the rate of JSW loss
- Automated [quantitative] methods for assessing parameters of JSW offer promise of improved.. responsiveness



Incident Knee Replacement by X-ray Status

• 8201 OAI knees, 9 yr follow up, 436 with KR



Pain predicted by X-ray KL grade



- MOST and Framingham
- Within-person knee-matched design, eliminating between-person differences
- Strong relationship between KL grade and severity of pain

OA Imaging Biomarkers: X-rays

Strengths:

- Cheap, feasible
- Measure a broad OA construct involving JSW (surrogate for cartilage) and osteophytes
- Provided our understanding of OA epidemiology
 Weaknesses:
- JSW is a very 'noisy' measure; osteophytes disappear if knee rotates slightly
- Needs large, long duration trials
- Poor relationship to symptoms at individual level



How has MRI helped?



Direct visualisation of tissues



Hunter et al. Osteoarthritis Cartilage 2011



Demonstrated insensitivity	MRI features	Overall (n=710)	
of Xray	Any abnormality	631 (89)	
 Community-based 	Osteophytes	524 (74)	
study of 710 people >50yo	Cartilage damage	492 (69)	
 No radiographic evidence of knee OA 	Bone marrow lesions	371 (52)	
(weight-bearing, flexed	Synovitis	259 (37)	
PA view)	Attrition	228 (32)	
 1.5T MRI, read using WORMS 	Subchondral cysts	179 (25)	
	Meniscal lesions	167 (24)	
	Ligamentous lesions	66 (9)	



Guermazi A et al, BMJ 2012;345:e5339

Structure: MRI cartilage



OA MRI: Cartilage Morphology

- Measuring a single
 construct
- Very good construct validity and reliability





Predictive validity for TJR

Table 3. Odds of knee replacement according to MRI features of osteoarthritis

Component	Feature	Odds ratio (95% CI)
Cartilage		
	Tibial cartilage loss >8% vs.	7.1 (1.4–36.5)
	tibial cartilage volume >3%	
	Higher cartilage defect scores (8–15) vs.	6.0 (1.6–22.3)
	Lower cartilage defect scores (2–7)	
	Medial cartilage volume loss	18.7 (2.4–145.7)
	Maximum grade for area extent of cartilage damage in the whole knee	4.00 (2.23-7.18)
	Maximum grade for full thickness cartilage damage in the whole knee	3.45 (2.15–5.55)



Demehri S et al Curr Opin Rheum 2015 (also Pelletier JP et al Ann Rheum Dis 2013)

Quantitative MRI Measures of Cartilage (cMFTC) Predict Knee Replacement

- Nested case-control study of OAI: 127 [113 pts] knees
 replaced between BL and Y4
- 1 control knee matched for BL KLG, gender, age
- Longitudinal change in cMFTC between T-1 and T0 significantly greater in KR cases: median -0.115 μm vs controls: median -0.060 μm (p=0.006); ccAUC=0.59
- Longitudinal differences differed by KLG, p=0.002;
 KLG 2 cases: median -0.145 μm vs controls: +0.035 μm
 KLG 3 cases: median -0.170 μm vs controls: -0.120 μm



OARSI OA Knee Trial Recommendations: MRI

- For MRI cartilage morphometry in knee OA, there is some evidence for construct and predictive validity, with good evidence for reliability and responsiveness
- Using MRI it is possible to accurately and feasibly measure change in cartilage morphometry over 12 months for knee OA
- It is possible to "enrich" a study population with MRI outcomes in order to increase the rate of cartilage loss, for example, by including higher KL grade...
- In terms of correlations with concurrent symptoms, there is a weak association between progression of cartilage loss and increasing symptoms.
- There is some predictive validity with progression of cartilage loss predicting subsequent total joint replacement
- More information is required on the performance metrics of MRI semiquantitative and compositional measures of cartilage



Hunter DJ et al Osteoarthritis Cartilage 2015

Predictive Validity for Symptoms (FNIH)

Group comparison&		Cartilage thickness change	
		BL→24M	BL→12M
		aOR (95% CI)	aOR (95% CI)
l vs. 4	Xray + pain vs. control	3.8 (2.7, 5.3) #	1.8 (1.4, 2.3) #
2 vs. 4	Xray vs. control	3.8 (2.7, 5.5) #	2.0 (1.5, 2.6) #
3 vs. 4	Pain vs. conrol	0.9 (0.6, 1.3)	1.2 (0.9, 1.5)
1+2+3 vs. 4	Xray or pain. vs. control	2.5 (1.9, 3.3) #	1.6 (1.3, 2.0) #
1+2 vs. 3+4	Xray vs non-Xray	4.0 (2.9, 5.3) #	1.8 (1.4, 2.1) #
1+3 vs. 2+4	Pain vs. Non-Pain	1.3 (1.1, 1.6) §	1.2 (1.0, 1.4)

 x^{α} group 1 = knees with both radiographic (Xray) and pain progression (primary cases); group 2 = knees with radiographic progression but not pain progression; group 3 = knees with pain progression but not radiographic progression; group 4 = knees with neither radiographic nor pain progression (super controls).



Eckstein F et al. Arthritis Rheumatol 2015

Predictive Validity for Symptoms



Preceding and concurrent cartilage thickness change in the cMFTC of knees with or without pain progression and knees with or without radiographic progression in the period Y2 \rightarrow Y4.



MRI Cartilage: Predictive Probability for KR

- OAI knees with symptomatic OA at baseline
 - Definite osteophyte (OARSI atlas grade 1-3; clinical center screening reading
 - Frequent knee symptoms at baseline
- MRI readings at baseline and Y2; knee replacement outcomes after the 2-year imaging window



MRI Cartilage: Predictive Probability for KR



Two-year FTJ cartilage thickness loss, mm



Kwoh CK et al. IWOAI 2018 [oral presentation]

Structure: MRI bone



MRI Bone: Bone Marrow Lesions





Roemer F et al. Osteoarthritis Cartilage 2009

Understanding 3D bone shape



Understanding 3D bone shape: machine learning



Courtesy Imorphics

3D bone shape: predictive validity

	incident radiographic OA in the whole sample				
3-D bone shape vector	Incident radiographic knee OA, irrespective of time of OA onset		Incident radiographic knee OA, occurring 24–48 months later		
	Adjusted OR (95% CI)†	<i>P</i> ‡	Adjusted OR (95% CI)†	<i>P</i> ‡	
Whole joint (femur, tibia, and patella)					
Highest tertile	2.5(1.5-4.1)	0.0005	3.0 (1.5-6.0)	0.003	
Middle tertile	1.8(1.1-2.9)		2.6 (1.3-5.1)		
Lowest tertile (reference)	1.0		1.0		
Per SD unit change toward mean OA shape	1.5 (1.2–1.8)	0.0003	1.6 (1.2–2.1)	0.001	
Tibiofemoral joint (femur and tibia)					
Highest tertile	1.8 (1.1-2.9)	0.03	2.4 (1.2-4.7)	0.01	
Middle tertile	1.6(1.0-2.6)		2.3 (1.2-4.5)		
Lowest tertile (reference)	1.0		1.0		
Per SD unit change toward mean OA shape	1.3 (1.1–1.6)	0.003	1.5 (1.2–2.0)	0.002	



Neogi T et al Arthritis Rheum 2013

Relationship of baseline 3-D hone shape to
Quantitative MRI bone area



Bowes et al, Ann Rheum Dis 2015

Bone Shape predicts Knee Replacement

	Univariable (unadjusted)				Multivariable*		
lmaging variable	OR	95% CI	p value	AIC	OR	95% CI	AIC
Femur vector	1.79	1.54, 2.09	<0.001	309.51	1.21	1.01,1.45	228.33
Tibia vector	1.64	1.42, 1.90	<0.001	334.86	1.02	0.84,1.24	232.66
Patella vector	1.40	1.26, 1.56	<0.001	346.33	1.09	0.95,1.26	231.24
KL grade (ref=KL zero)					*A	djusted for K	Ĺ
1	2.42	0.75, 7.82	0.14				
2	9.08	3.36,24.49	<0.001				
3	31.55	11.23,88.63	<0.001				
4	72.77	22.62,234.07	<0.001	230.70		Barr AJ et al. Ann Rheum [Dis 2015

3D Bone vs Structure and Symptom Progression

	Any progression OR (95% CI) per 1 SD increase in change	Radiographic progression OR (95% CI) per 1 SD increase in change	Pain progression OR (95% CI) per 1 SD increase in change	
Medial				
Femur	2.13 (1.68 to 2.71)	2.62 (2.07 to 3.34)	1.30 (1.08 to 1.56)	
Tibia	1.63 (1.33 to 1.99)	1.84 (1.51 to 2.24)	1.17 (0.99 to 1.39)	
Patella	1.39 (1.15 to 1.68)	1.45 (1.21 to 1.75)	1.25 (1.05 to 1.48)	
Lateral				
Femur	1.25 (1.04 to 1.50)	1.29 (1.08 to 1.55)	1.17 (0.98 to 1.40)	
Tibia	1.51 (1.24 to 1.83)	1.73 (1.43 to 2.10)	1.22 (1.03 to 1.45)	
Patella	1.45 (1.19 to 1.76)	1.52 (1.26 to 1.84)	1.29 (1.08 to 1.54)	
Notch	1.51 (1.24 to 1.83)	1.57 (1.31 to 1.89)	1.16 (0.98 to 1.37)	
Lateral				
Trochlea	1.35 (1.12 to 1.63)	1.53 (1.27 to 1.84)	1.21 (1.02 to 1.44)	
Medial				
Trochlea	1.71 (1.38 to 2.12)	2.02 (1.63 to 2.49)	1.26 (1.06 to 1.50)	
Shape (vector)				
Femur	1.86 (1.48 to 2.33)	2.56 (2.03 to 3.24)	1.16 (0.97 to 1.39)	
Tibia	1.42 (1.18 to 1.72)	1.83 (1.51 to 2.22)	1.16 (0.98 to 1.37)	Hunter DJ et al.
Patella	1.33 (1.10 to 1.62)	1.26 (1.05 to 1.50)	1.23 (1.03 to 1.47)	Ann Rheum Dis 2015

3D bone shape: B score



Relationship of cartilage to bone: whole OAI (9433 knees)



B score

Blue box shows healthy range - 95% CL of KL 0 knees



Bowes MA et al In preparation

OA Imaging Biomarkers: MRI B score

- Reader independent
- Extremely reliable
- Scalar instrument, provides a better ruler for assessing OA structure (40 pts vs 5 for KL grade)
- From a single time point, predicts radiographic progression and patient symptoms



In this multi-tissue disease, which imaging structure should we choose?















BML











Synovial Hypertrophy in OA Knee



What are the implications of better structural measurement?



Can we enrich?

- Traditionally KL2-3 is a common inclusion, attempting to find real OA
- KL grading quite noisy



Improving Responsiveness of Imaging Biomarkers by JSW Criteria

SRM (± 95% confidence limits)



Year 1 ■ Year 2

 Responsiveness of knees selected for rJSW 2-4mm and WOMAC pain ≥3 (n=331, from OAI)



Bowes M et al Ann Rheum Dis [suppl] 2017

Improving Study Numbers



Patient Numbers Per Arm to detect 50% change, 80% power, α = 0.05



Bowes M et al Ann Rheum Dis [suppl] 2017

Improving Responsiveness of Imaging Biomarkers by JSW Criteria





Eckstein F. OARSI 2019 [Oral presentation]

Is it possible to modify OA structure?



Sprifermin 5 yr Phll trial: FORWARD



Sprifermin 5 yr Phll trial: FORWARD





New Cathepsin K inhibitor (MIV-711): Study design

- Knee pain \geq 4, <10 on NRS, K-L grade 2 or 3
- All patients remained on current stable analgesia



Results: MRI measures

Area of bone in MF

Area of bone in medial femur region, MF (mm²) Average thickness of cartilage in CMF (mm) LSMeans of change from baseline together with 95% confidence intervals LSMeans of change from baseline together with 95% confidence intervals 30 Unadjusted one-sided p values= 0.002 (100 mg), 0.004 (200 mg) Unadjusted one-sided p-values = 0.023 (100 mg) and 0.125 (200 mg) 0.05 Change from baseline Change from baseline 0.00 20 -0.05 10 -0.10 0 10 12 16 18 20 22 24 26 10 12 14 16 18 20 22 24 26 0 14 0 8 8 2 6 Week Week **Treatment Group Treatment Group** - PLACEBO - → - MIV-711 100 mg - ★ - MIV-711 200 mg - PLACEBO - →- MIV-711 100 mg - ★- MIV-711 200 mg **Reduction in bone area** Trend for reduced cartilage thickness loss for both doses increase for both doses Conaghan et al. ACR 2017

Average cartilage thickness in CMF

Lessons from RCTs

- Our 2 best MRI biomarkers can show change
- Change is measurable over a reasonable time period
- Symptomatic benefit likely occurs in a different time frame



How do we we move forward?



OA is more like osteoporosis...

- ...than rheumatoid arthritis
- In RA, concept of DMARD came first from modification of symptoms (inflammation) and reducing consequent damage
- In OA, we see many, many years of accumulation of silent tissue pathologies before any symptoms



But OA is unique and different from osteoporosis...

- We can detect change in bone and cartilage from people in their 20s (not post-menopausal)
- People also have symptoms for many years before requiring total joint replacement (osteoporosis is asymptomatic till fracture)
- This means long-term trials waiting to see benefits in terms of joint replacement are unfair to patients (leaving them in pain) and unfeasible (so we can't do analogous fracture endpoint trials)



The conundrum

- OA is multi-tissue disease but cartilage and bone do reflect the disease process
- We have very good validated MRI quantitative tools for cartilage and bone that allow feasible clinical trials
- However clinical outcomes resulting from structural improvements (only) will likely be many years away



Acknowledgements

- Mike Bowes
- Alan Brett
- Felix Eckstein
- Virginia Kraus
- Lee Simon



CURRENT STATUS OF SOLUBLE BIOMARKERS FOR OA

Virginia Byers Kraus, MD, PhD 5.16.19

Rationale for biomarkers in OA as endpoints of disease modification (accelerated and traditional approval)

- More likely to be disease related;
- More appropriate for Disease Modifying OA Drug (DMOAD) development;
- Creates a potential path for treating early OA -- BEFORE illness -- when disease more likely modifiable;
- Reports on overall burden of disease (holistic endpoint for generalized disease);
- > Potentially avoids unintended consequences of primary emphasis on PROs:
 - ✓ Pain opioid crisis
 - ✓ Pain Nerve Growth Factor inhibitor induced rapidly progressive osteoarthritis
- Improves chances of drug program success;
- Creates a path for developing personalized medicine strategies for OA.

Overview

Summary FNIH OA Biomarkers Consortium status

Highlight link of type II collagen degradation and synthesis biomarkers to clinically relevant outcomes

Status of Soluble Biomarker Qualification -Synergy of Current Endeavors







Phase I: Soluble Biomarker Qualification

- Biomarkers: measured in OAI
- **Endpoint:** 48M
- Primary Outcome: CLINICALLY RELEVANT (case) radiographic progression (0.7 mm joint space narrowing) + Pain progression (increase WOMAC pain score of ≥9 out of 100 units)
- Predictors of CASE status: Baseline biomarkers & Change OR time-integrated concentrations over 12M or 24M

JE Collins, t al. 2016. Semi-quantitative imaging biomarkers of knee osteoarthritis. Arthritis Rheumatol Oct;68(10):2422-31. doi: 10.1002/art.39731 doi: 10.1002/art.39731 PMID:27111771 PMC5599158
FW Roemer, et al. 2016. Semi-quantitative imaging biomarkers of knee osteoarthritis progression in the FNIH biomarkers consortium cohort. BMC Musculoskeletal Disorders Nov 10;17(1):466. PMC5105263
V Kraus et al. 2017. Predictive validity of biochemical biomarkers in knee osteoarthritis. Annals Rheumatic Diseases. Jan;76(1):186-195 doi: 10.1136/annrheumdis-2016-209252, PMID:27296323, PMC5851287
V Kraus et al. 2017. Establishment of reference intervals for osteoarthritis-related soluble biomarkers. Annals Rheumatic Diseases. Jan;76(1):179-185. PMID:27343253 [PMC journal in progress]
V Kraus et al. 2018. Predictive validity of radiographic trabecular bone texture in knee OA. Arthritis Rheum Jan;70(1):80-87. PMID: 29024470, NIHMS911846, PMC5745253



Phase II: Soluble Biomarker Qualification

- Biomarkers: measured in *placebo* arms of clinical trials
- **Endpoint:** 24M (12M when 24M unavailable; 36M ancillary when available)
- Primary Outcome: Radiographic progression (0.7 mm joint space narrowing)
- Secondary Outcomes: Radiographic progression (0.5 mm joint space narrowing); Pain Progression; Radiographic+Pain Progression



Trials & number (n) placebo treated participants with data available for trabecular bone texture (TBT) biomarker analyses:

Calcitonin (<u>NCT00486434</u>, <u>NCT00704847</u>) VIDEO (vitamin D) (<u>ISRCTN94818153</u>) Cindunistat (iNOS inhibitor) (<u>NCT00565812</u>) Sprifermin I (FGF-18) (<u>NCT01033994</u>) Sprifermin II (FGF-18) (<u>NCT01033994</u>) TissueGene-C (TGF-beta1) (<u>NCT02072070</u>) SEKOIA (Strontium Ranelate) (<u>ISRCTN41323372</u>) n=809 [Novartis] n=237 n=27 [Pfizer] n=48 [Merck Serono] n=108 [Merck Serono] n=81 [Invossa/KOLON Life Science] n=120 (Servier]





Status of Soluble Biomarker Qualification

Primary COU:

Prognostic <u>baseline</u> biomarkers - MRI, biochemical and radiographic trabecular bone texture (TBT) - to enrich enrollment/identification of osteoarthritis patients that are likely to experience long term radiographic progression in the absence of treatment.

Secondary or allied COUs:

Prognostic <u>short-term change</u> in MRI or <u>time-integrated concentrations (TICs)</u> in biochemical and TBT biomarkers (baseline to 12 months) to provide a method of identification of osteoarthritis patients that are likely to experience long-term radiographic progression in the absence of treatment.

LOI for biochemical markers targeted for June 2019 submission to FDA

Status of Soluble Biomarker Qualification

Biochemical: 9 biochemical markers in urine (u) or serum (s) – uCTXII sPIIANP and uC2C-HUSA (are derived from COL2A1); sNTXI, uNTXI, sCTXI, uCTXIalpha, uCTXIbeta (are derived from COL1A1); and sHyaluronan (PDB name 3HYA). uCreatinine (uCr) for normalizing urine biomarkers

Biomarker Domain	Available Sample Size	OA Progression Rate	Predicted Odds of progression	Estimated Power
Biochemical (n=1126)	1000	11%	1.4	88%



bio

Biomarkers of Collagen Degradation and Synthesis

HIGH Degradation

Type II Collagen Degradation: uCTXII

Human Cartilage CTXII

Cartilage Eroded Surface

Joint tissue Degeneration & OA Progression

Osteophyte

Huebner, Karsdal, Kraus et al. A&R 2014

Synthesis LOW

Type II Collagen Synthesis: sPIIANP (pro-C2)

Key Biomarkers of Type II Collagen Degradation & Synthesis



TYPE II COLLAGEN

High baseline uCTX-II predicts 'clinically relevant progression' Pain+Radiographic Worsening over 4 years

bion

CONSORTIUM



Predictive validity of biochemical biomarkers in knee osteoarthritis: data from the FNIH OA Biomarkers Consortium. Kraus VB, Collins JE, Hargrove D, et al ARD 2017, 76:186-195.

Type II collagen degradation [IDS (AC-10F1)] CVs 5.21%

	Baseline concentration				
N=600	Mean (SD) med	OR (95% CI)			
Biomarker	Comparators	Cases	p Value		
Serum C1, 2C	-0.03 (0.98)	0.06 (1.04)	1.09 (0.91 to 1.30)		
	-0.09	0.02	0.3510		
Serum C2C	-0.02 (0.94)	0.04 (1.11)	1.05 (0.88 to 1.26)		
	-0.16	0.12	0.5772		
Serum Coll2-1 NO2	0.00 (1.03)	-0.00 (0.94)	1.00 (0.83 to 1.21)		
	0.18	-0.13	0.9601		
Serum CPII	0.00 (1.02)	-0.00 (0.95)	0.98 (0.81 to 1.18)		
	0.15	-0.13	0.8017		
Serum CS846	0.01 (0.96)	0.03 (1.09)	1.06 (0.89 to 1.25)		
	0.21	0.23	0.5286		
Serum CTXI	0.05 (1.01)	0.10 (0.96)	1.18 (0.99 to 1.41)		
	0.28	0.04	0.0583		
Serum COMP	0.02 (1.02)	-0.05 (0.95)	0.89 (0.74 to 1.07)		
	0.13	-0.24	0.2254		
Serum HA	0.04 (1.03)	0.07 (0.93)	1.07 (0.89 to 1.29)		
	0.32	0.22	0.4466		
Serum MMP3	0.02 (1.00)	0.03 (1.00)	0.99 (0.81 to 1.22)		
	0.22	0.24	0.9416		
Serum NTXI	0.05 (0.99)	0.10 (1.01)	1.18 (0.99 to 1.41)		
	0.22	0.01	0.0591		
Serum PIIANP	0.04 (0.99)	-0.09 (1.03)	0.88 (0.74 to 1.06)		
	0.03	-0.16	0.1729		
Urine Coll2-1 NO2 creatinine adjusted	0.02 (1.02)	0.03 (0.96)	1.05 (0.88 to 1.24)		
	0.27	0.20	0.6075		
Urine C1, 2C creatinine adjusted	0.03 (1.02)	-0.06 (0.96)	0.91 (0.76 to 1.09)		
	0.14	-0.30	0.3166		
Urine C2C-HUSA creatinine adjusted	0.04 (0.95)	0.09 (1.09)	1.12 (0.94 to 1.34)		
	0.20	0.08	0.2030		
Urine CTXII creatinine adjusted	0.07 (0.96)	0.15 (1.06)	1.29 (1.08 to 1.55)		
	0.35	0.09	0.0049		
Urine NTXI creatinine adjusted	-0.04 (1.03)	0.09 (0.94)	1.17 (0.98 to 1.39)		
	-0.24	0.07	0.0842		
Urine CTXI α creatinine adjusted	-0.05 (0.99)	0.11 (1.01)	1.20 (1.01 to 1.43)		
	-0.26	0.10	0.0364		
Urine CTXI β creatinine adjusted	-0.03 (1.01)	0.06 (0.97)	1.14 (0.96 to 1.36)		
	-0.27	0.12	0.1408		
High baseline uCTX-II predicts total joint replacements (TJR) in OA trial participants over 2 years

High baseline CTXII: 3 X higher risk of TJR (knee or hip) 9 X higher risk of TKR (knee)



Post hoc analysis of two clinical trials investigating oral salmon calcitonin in OA, CSMC021C2301 (NCT00486434) and CSMC021C2302 (NCT00704847)



Biomarkers of bone and cartilage turnover CTX-I and CTX-II predict total joint replacements in osteoarthritis J.J. Bjerre-Bastos, A.-C. Bay-Jensen, M.A. Karsdal, I. Byrjalsen, J.R. Andersen, B.J. Riis, C. Christiansen, A.R. Bihlet



Osteoarthritis and Cartilage 2019 27, S31-S32DOI: (10.1016/j.joca.2019.02.046) Copyright © 2019 <u>Terms and Conditions</u>

Low 12 month Time-Integrated-Concentration of PIIANP predicts 'clinically relevant progression' Pain+Radiographic Worsening



Predictive validity of biochemical biomarkers in knee osteoarthritis: data from the FNIH OA Biomarkers Consortium. Kraus VB¹, Collins JE², Hargrove D, et al ARD 2017, 76

Type II collagen synthesis [Merck Group/Millipore (EZPIIANP-53K)] CV 12.3%



bfomarkers

CONSORTIUM



Low baseline sPIIANP with MRI features predicts 'clinically relevant progression' -- Pain+Radiographic Worsening over 4 years

Model	A *	В	С	D
Selection Method	Stepwise, SBC Imaging + Biochem	Stepwise, AIC Imaging only	Stepwise, AIC Imaging + Biochem	Stepwise, AIC BICL + Biochem (exclude cMFTC.THCtAB)
Model Characteristics AUC (unadjusted) AUC (adjusted)	0.679 0.707	0.682 0.715	0.696 0.737	0.692 0.720
AUC (adusted, 10 fold cross val)	0.670	0.677	0.697	0.678
IDI (vs covariates only model) NRI (vs covariates only model) % cases correctly reclassified % controls correctly reclassified	0.0825 0.5229 34% 19%	0.0896 0.5847 34% 24%	0.1090 0.5753 28% 29%	0.0927 0.5613 30% 26%
Biomarkers Included				
BICL	Locations with osteophyte	Locations with osteophyte	Locations with osteophyte	Locations with osteophyte
Chondrometrics	Cart thickness: ccMF.ThCtABMFT C	Cart thickness: ccMF.ThCtABMFTC	Cart thickness: ccMF.ThCtABMFTC cMF.ThCtABMFTC eMF.ThCtABMFTC	Cart thickness: ccMF.ThCtABMFTC ecMF.ThCtABMFTC
BiomediQ	Med meniscus volume	Med meniscus volume	Med meniscus volume	Med meniscus volume
Imorphics		Patella Vector of 3D shape	Patella Vector of 3D shape	Patella Vector of 3D shape
BIOCHEM			Serum PIIANP	Serum PIIANP



ers

CONSORTIUM

biomai

* The same set of biomarkers are chosen in the SBC imaging only analysis, and the p-value based selection (N=600) [Hunter & Kraus et al, unpub)

Low Baseline PIIBNP (Pro-C2) predicts radiographic progression



CSMC021-2301 Sub-study of oral salmon calcitonin trial NCT00486434

Yunyun Roy Luo1,2, Niamh Higgins2, Yi He2, Inger Byrjalsen2, Jeppe Andersen2, Asger Bihlet2, Morten Karsdal1, Anne C. Bay-Jensen1

1University of Copenhagen, Denmark

2Nordic Bioscience A/S, Denmark

Low baseline PIIBNP (Pro-C2) predicts greater response to Oral Salmon Calcitonin



Student's t-test. Adjusted for BMI, sex, age, and baseline JSW

CSMC021-2301 Sub-study of oral salmon calcitonin trial NCT00486434

Yunyun Roy Luo1,2, Niamh Higgins2, Yi He2, Inger Byrjalsen2, Jeppe Andersen2, Asger Bihlet2, Morten Karsdal1, Anne C. Bay-Jensen1 1University of Copenhagen, Denmark

2Nordic Bioscience A/S, Denmark

Linking biomarkers to clinically relevant outcomes



<u>To qualify for accelerated approval</u>: A drug that treats a serious condition AND generally provides a meaningful advantage over available therapies AND demonstrates an effect on a surrogate endpoint that is reasonably likely to predict clinical benefit on.....irreversible morbidity or mortality (IMM) or other clinical benefit (i.e., an intermediate clinical endpoint)

Guidance for Industry: Expedited Programs for Serious Conditions – Drugs and Biologics (May 2014)

Remaining Challenges

- > Pathogenesis of OA remains complex and multifactorial;
- > The heterogeneity of molecular pathways in OA may require different molecular markers;
- Unknown relationship of the magnitude of change in the biomarker to a clinically meaningful change in clinical outcome.

QUESTIONS?





Applying Biomarkers for Accelerated Approval of OA Structure Modifying Drugs

OARSI Meeting Washington DC May 16, 2019

Nikolay P. Nikolov, M.D. Associate Director for Rheumatology Division of Pulmonary, Allergy, and Rheumatology Products U.S. Food and Drug Administration



Disclosure

- This presentation is not intended to convey official US FDA policy, and no official support or endorsement by the US FDA is provided or should be inferred
- The materials presented are available in the public domain
- I do not have any financial interest or conflict of interest with any pharmaceutical company



Outline

- Background
- Benefit-Risk Framework
- Definitions
- Considerations on Biomarkers and Accelerated Approval
- Structural Endpoints in OA: Challenges and Opportunities
- Summary



Background

- Significant public health issue, affecting over 30 million people in the US¹
- Causes significant pain and disability
- Can be a serious disease²
- Current treatment options limited to symptomatic therapies and have toxicities
- Unmet need for therapies that would impact the natural history of OA

¹ Castaneda MG, et al., Arthritis Care and Res (Hoboken), 2016 May; 68(5):574-80

² <u>https://www.oarsi.org/sites/default/files/docs/2016/oarsi_white_paper_oa_serious_disease_121416_1.pdf</u> 65

Benefit-Risk Assessment

Basis for FDA's regulatory decision-making

• <u>Benefit</u> = Clinical Benefit = an improvement in how a patient



Endpoints in trials of OA treatments need to demonstrate the clinical benefit directly or at least be interpretable with respect to the clinical benefit to be expected

• <u>Risk</u>: every therapeutic carries some degree of risk and in this framework every product is expected to show some benefit that outweighs the risk of the therapy



Outcome Measures

- Efficacy assessment
 - Clinical endpoint
 - Measures how a patient feels, functions, or survives
 - Surrogate endpoint
 - A measure expected to predict clinical benefit or harm
 - Biomarker
 - Objective measure of normal biologic process, pathogenic process, or pharmacologic response to an intervention
- Safety assessment
 - Descriptive and empiric
 - Guided by drug class, prior experience, events of interest, etc.



BEST: <u>Biomarkers</u>, <u>EndpointS</u>, and other <u>Tools</u>



- A glossary of terminology and uses of biomarkers and endpoints in basic biomedical research, medical product development, and clinical care
- Created by the NIH-FDA Biomarker Working Group
- BEST harmonizes terms and definitions and addresses nuances of usage and interpretation among various stakeholders

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



Definitions

- <u>Clinical Outcome</u>: An outcome that describes or reflects how an individual feels, functions or survives
 - Historically, clinical outcomes have served as **direct measures of clinical benefit**
- <u>Biomarker:</u> A defined characteristic that is measured as an indicator of normal biological processes, pathogenic processes, or responses to an exposure or intervention, including therapeutic interventions. *Molecular, histologic, radiographic, or physiologic characteristics are types of biomarkers*
 - A biomarker is not an assessment of how an individual feels, functions, or survives



Definitions

 Surrogate Endpoint: An endpoint that is used in clinical trials as a substitute for a direct measure of clinical benefit. 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

From a U.S. regulatory standpoint, surrogate endpoints and potential surrogate endpoints can be characterized by the level of clinical validation: validated surrogate endpoint, reasonably likely surrogate endpoint, candidate surrogate endpoint



Section 507(e)(9) of the FD&C Act

"[t]he term 'surrogate endpoint' means a marker, such as a laboratory measurement, radiographic image, physical sign, or other measure, that is **not itself a direct measurement of clinical benefit**, and—

- "(A) is known to predict clinical benefit and could be used to support <u>traditional</u> <u>approval</u> of a drug or biological product; or
- "(B) is reasonably likely to predict clinical benefit and could be used to support the <u>accelerated approval</u> of a drug or biological product in accordance with section 506(c)."

*Section 3011 of the 21st Century Cures Act established section 507 of the Federal Food, Drug, and Cosmetic Act (FD&C Act)

www.fda.gov

Accelerated Approval Considerations

- Product must be for a serious or life-threatening disease or condition
- FDA is to take "...into account the severity, rarity, or prevalence of the condition and the availability or lack of alternative treatments" when determining whether to grant approval under this program
- For drugs granted accelerated approval, postmarketing confirmatory trials are generally required to verify and describe the anticipated effect on irreversible morbidity or mortality or other clinical benefit
- Approval of a drug may be withdrawn, if trials fail to verify clinical benefit or do not demonstrate sufficient clinical benefit to justify the risks associated with the drug

Guidance for Industry: Expedited Programs for Serious Conditions, issued May 2014: https://www.fda.gov/files/drugs/published/Expedited-Programs-for-Serious-Conditions-Drugs-and-Biologics.pdf

Surrogate Endpoints: Examples

- Traditional Approval
 - Serum uric acid (Gout)
 - Blood pressure (HTN)
 - Electrolytes (Na, K)
 - Hemoglobin A1c (DM)
 - LDL cholesterol
 - Viral load (HIV)

- Accelerated Approval
 - PFS, ORR (solid tumors)
 - Ig responses (Vaccines)
 - Skeletal muscle dystrophin (DMD)
 - Sputum conversion to negative (TB)
 - Viral load (HIV)

Table of Surrogate Endpoints:

https://www.fda.gov/drugs/development-resources/table-surrogate-endpoints-were-basis-drug-approval-or-licensure

www.fda.gov

Evidentiary Criteria for Surrogate Endpoints

What the law says: Discusses, in general terms, the evidence needed to support a "reasonably likely surrogate" but not a validated surrogate endpoint

What FDA guidance documents say:

- FDA has issued a guidance document that contains fairly granular guidance on evidence that should be considered when evaluating a "reasonably likely surrogate" supporting accelerated approval
- At present, no FDA guidance document contains a detailed discussion of the evidence needed to establish a "validated surrogate endpoint" supporting traditional approval, however FDA has stated that the standard is high

Guidance for Industry: Expedited Programs for Serious Conditions, issued May 2014: https://www.fda.gov/files/drugs/published/Expedited-Programs-for-Serious-Conditions-Drugs-and-Biologics.pdf

Assessment of Candidate Surrogate Endpoints

- **Biologic plausibility**: whether surrogate is on pathophysiologic pathway leading to clinical outcome of interest (causal? necessary intermediate?)
- Strength and consistency of epidemiologic data supporting relationship between surrogate and clinical outcome of interest
- Whether treatment effects on surrogate have been shown to predict treatment effects on clinical outcome of interest (with drugs in the same/related pharmacologic class? with drugs from distinct pharmacologic classes/ regardless of the mechanism of the intervention?)

Guidance for Industry: Expedited Programs for Serious Conditions, issued May 2014: https://www.fda.gov/files/drugs/published/Expedited-Programs-for-Serious-Conditions-Drugs-and-Biologics.pdf

www.fda.gov



Complex Relationships: Disease – BM – Clin Outcome

Disease processes are complex and drugs have effects beyond those that are intended, thus...

- Identifying the right surrogate endpoints that can reliably or reasonably likely predict a treatment's effect on a clinical outcome, and
- **Defining the magnitude of change** in the surrogate endpoint that would reliably predict a meaningful changes in the clinical outcome of interest

...can be a challenge



Complex Relationships: Disease – BM – Clin Outcome

- When biomarkers/surrogate endpoints are used, there is always some **residual uncertainty** about the nature of a treatment's benefit
 - Biomarkers may fail to predict clinical benefit, i.e. the assumption of the strength (or presence) of relationship to clinical endpoint is not valid
- Notable examples of biomarkers that performed well in identifying patients at risk for poor outcomes/progression but **failed** to predict a treatment's effect on those outcomes:
 - HDL-C and CV outcomes
 - NSVT and death



Complex Relationships: Disease – BM – Clin Outcome

- Correlation between a biomarker and a clinical endpoint is not sufficient to demonstrate that an effect on the proposed surrogate endpoint will reliably predict an effect on the clinical outcomes of interest
- Ideally, this demonstration would be based on empirical evidence from randomized, controlled comparisons from clinical trials and/or on a comprehensive understanding of the disease process and drug mechanism of action

Complex Relationships: *Disease – BM – Clin Outcome*

- Surrogate on causal pathway modulated by drug
- Biomarkers may reflect and predict changes in the clinical outcome



Complex Relationships: *Disease – BM – Clin Outcome*

- Surrogate on causal pathway modulated by drug
- Biomarkers may reflect and predict changes in the clinical outcome
- Surrogate *not* on pathway of drug MOA so may only indirectly correlate with outcome
- Multiple disease MOAs may lead to clinical outcome and drug may impact only one



Complex Relationships: Disease – BM – Clin Outcome

- Surrogate on causal pathway modulated by drug
- Biomarkers may reflect and predict changes in the clinical outcome
- Surrogate *not* on pathway of drug MOA so may only indirectly correlate with outcome
- Multiple disease MOAs may lead to clinical outcome and drug may impact only one
- May lead to **other toxicities** so that BM does not adequately predict benefit / risk balance
- Drug may induce adverse effects on desired clinical outcome through a pathway not reflected by BM (so net benefit of drug not reflected by change in BM)





Confirmatory Trial Considerations

- Conducting post-marketing studies to verify the benefit of drugs approved under accelerated approval can be challenging
 - Drug availability after accelerated approval may interfere with the ability to recruit and keep patients assigned to placebo from crossing over to active treatment, especially for long-term clinical trials; missing data is also a concern
- This can compromise the validity of such studies and preclude the reliable assessment of a clinical outcome for drugs approved under accelerated approval, leaving the residual uncertainties about the true clinical benefit-risk assessment of a marketed product unaddressed

Surrogate Endpoint Considerations

"Because of the substantial risk of adversely affecting the public health, if a biomarker is falsely accepted as a surrogate endpoint, robust scientific evidence is needed to justify qualification of a biomarker for use as a surrogate endpoint. There have been numerous **biomarkers that represented plausible surrogate endpoints** (e.g. reduced rate of ventricular premature beats following a heart attack, cardiac output in congestive heart failure, increased HDL cholesterol in patients with coronary artery disease). However, when tested in outcome trials, these biomarkers have failed to predict the expected *clinical benefit*. It has generally not been clear whether this represented an erroneous expectation of a relationship of the biomarker to the outcome or an unrecognized offtarget effect of the drug... "

Guidance for Industry and FDA Staff: Qualification Process for Drug Development Tools, issued January 2014: https://www.fda.gov/files/drugs/published/Qualification-Process-for-Drug-Development-Tools.pdf

www.fda.gov



Use of Biomarkers in Drug Development

- **Context of use**: the disease setting and how the biomarker is to be used (e.g., the BEST biomarker type)
- Individual biomarkers can (eventually) serve multiple purposes, for example....
 - **Diagnostic**: cut point for diagnosis established
 - **Prognostic**: predicting likelihood of disease outcomes/complications
 - **Predictive**: predicting likelihood of response to drug
 - Pharmacodynamic: measures a biological response
 - Surrogate endpoint: response to drug predicts benefit on clinical outcome
- Use may **evolve over time**, as experience and data on course, predictive qualities, relationship to outcomes, responsiveness to treatment expands

Surrogate Endpoints: Examples

- Traditional Approval
 - Serum uric acid (Gout)
 - Blood pressure (HTN)
 - Electrolytes (Na, K)
 - Hemoglobin A1c (DM)
 - LDL cholesterol
 - Viral load (HIV)

- Accelerated Approval
 - PFS, ORR (solid tumors)
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Table of Surrogate Endpoints:

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www.fda.gov



OA Drug Development

Current Approach of Drug Development for OA

- Drugs approved for OA to date have been approved based on patient-reported outcomes (PROs) assessing two key OA domains
 - Pain *Feel*
 - Function Function

Patient Reported Outcomes in OA

- Examples of endpoints used in OA drug development
 - Western Ontario & McMaster Universities Osteoarthritis Index (WOMAC pain, function, stiffness)
 - Visual Analogue Scale ratings (VAS function and pain)
 - Patient global
 - Investigator's global
- FDA is open to other PROs guided by input from patients



OA Complex Relationships: Disease – BM – Clin Outcome

- OA is a complex and variable disease of more than just one tissue
 - Biomechanical factors, i.e. load, alignment, traumatic factors, meniscal injury, etc.
 - Genetic factors
 - Articular changes
 - Periarticular changes, bone remodeling
 - Tissue-level inflammation
- Discordance between structural changes and clinical symptoms
- No uniform definition of disease progression

Structural Outcomes in OA: Challenges

- Interruption of structural damage, preventing progressive loss of function and/or progressive increase in pain would be a substantial clinical benefit
 - Treatment may affect one of multiple pathways
 - What structural endpoint is relevant?
 - What magnitude, duration of effect on structural outcome is required?¹
 - Do on-target effects outweigh off-target effects?
 - Structural Outcomes

Biomarker, ? Surrogates
Structural Outcomes in OA: Challenges

- Endpoints are needed to reliably assess the ability of a product to alter the pathogenesis and the natural history of OA
- Knowledge gaps exist in the ability of treatment effects on common measures of structural progression to reliably predict treatment effects on direct measures of how patients function and feel
- To use structural outcomes in the benefit-risk assessment, we need to be able to describe the clinical benefit expected from the structural change

Structural Outcomes in OA: Challenges

- Approaches to use of structural outcomes in OA trials will depend on level of evidence and information available to characterize clinical benefit
 - With less information, structural outcomes may still be useful as adjunct or secondary endpoints in drug development
 - To be used as the primary endpoint to support approval, a high level of characterization would be needed about the relationship of the druginduced changes of the structural outcome to the anticipated clinical benefit

Osteoarthritis: Structural Endpoints for the Development of Drugs, Devices, and Biological Products for Treatment Guidance for Industry

FDA

DRAFT GUIDANCE

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Structural Endpoints in OA: Draft Guidance

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U.S. Department of Health and Human Services Food and Drug Administration Center for Drug Evaluation and Research (CDER) Center for Biologics Evaluation and Research (CBER) Center for Devices and Radiological Health (CDRH)

> August 2018 Clinical/Medical



Structural Outcomes in OA: *Opportunities*

- Engagement of:
 - Patients and their care givers
 - Health care professionals
 - Academics/clinical trialists/researchers
 - Industry
 - Government/regulators/payers

Structural Outcomes in OA: *Opportunities*

- Initial approval based on establishing efficacy on symptomatic endpoints, i.e. pain in OA
 - After the initial approval, investigate the ability of structural outcomes to predict long term clinical benefit

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Structural Outcomes in OA: *Opportunities*

- Study designs to assess direct clinical benefit of therapies that inhibit structural damage or target the underlying pathophysiology associated with OA
 - Composite endpoints that capture joint replacement, and "endstage" joint disease, i.e. the severe, irreversible, intolerable pain or functional impairment
 - Enrichment strategies
 - Models of accelerated OA
 - Trials in subjects prior to knee replacement



Ways to Engage FDA for Review and Advice

IND/NDA/BLA Pathway

Within an individual drug development program

Investigational New Drug (IND) submissions to FDA

Potential to result in *labeling* statements

DDT Qualification Pathway

<u>Outside</u> of an individual drug development program

Development of novel outcome measures (e.g., COA, biomarker) for use in multiple drug development programs addressing unmet measurement needs

Potential to result in *qualification* of outcome measure

Critical Path Innovation Meetings Pathway

<u>Outside</u> of an individual drug development program

Potential for *general CDER advice* on specific methodology or technology (e.g., PRO, wearables) in its early stages of development

Meetings are informal, non-binding discussions



Summary

- Establishing surrogate endpoints is a challenging, long and resource-intensive process that requires participation of many stakeholders
- Complex relationship exists between pathophysiology, structural damages, and clinical presentation and natural history of OA
- Ultimately, the goal of OA treatments is to provide clinical benefit to the patient
 - Goal of clinical trials is to demonstrate this benefit
- FDA recognizes the important public health need in OA and is open to collaborate with all stakeholders to bring safe and effective treatments for OA to market



Key References

- OA Guidance
 - <u>https://www.fda.gov/downloads/drugs/guidancecomplianceregulatoryinformatio</u> n/guidances/ucm071577.pdf
- OA Patient-Focused Drug Development (PFDD)
 - <u>https://www.arthritis.org/Documents/Sections/Science/OA-Voice-of-the-Patient-Report.pdf</u>
- Surrogate Endpoint Resources
 - <u>https://www.fda.gov/drugs/development-resources/surrogate-endpoint-resources-drug-and-biologic-development</u>

APPROVAL OF THERAPEUTICS FOR OSTEOARTHRITIS IN 2019

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Consulting

Abbott, Abraxxis, AcelRx, Affinergy, Agenus, Alder, Alimera, Alpha Rx, Altea, Analgesic Solutions, Antares, Anthera, Array, Asahi, Astra Zeneca, Avanir

Bayer, CaloSyn, Cephalon, Cerimon, Daiichi Sankyo, Dara, Dr Reddys, Durect, Elcos Sciences, EMD Serono, Eupraxia, Externa, Fidelity, Flexion, Forest, Genco, Genzyme, Gilead

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Omeros, Paraxel, Pfizer, PLx Pharma, Pozen, Proprius, pSivida, Purdue, Regeneron, Remedy, Rigel, Roche, Samumed, Sandoz, Sanofi, Shire, Takeda, Talagen Tigenix, Vical, Wyeth, XTL, Zydus

What is the Clinical Benefit from Therapy?



Osteoarthritis: The "Joint Organ"



What Are Potential Measurable Outcomes?



Current OA Drug Development Programs

To date typical development program

- Signs and symptoms
 - Pain
 - Function
 - Patient global
- What is expected in structural drug development programs
 - Structural benefit must be linked in some manner with symptomatic benefit (how a patient might feel, function or survive)
 - Assess benefit to entire joint
 - Halt progression of damage
 - Reverse damage

Challenges of OA Drug Development

- OA is multifactorial in cause
- Unpredictable progression
 - Rapid or slow progression
- Complex etiopathogenesis
 - A progressive disease **of the whole joint**:
 - Subchondral bone followed by effects on cartilage, with consequent increase in low grade inflammation
 - A progressive disease of cartilage
 - Subsequently impacting subchondral bone and consequent increase in low grade inflammation
 - Is it a progressive disease of *abnormal cartilage* sustaining normal load or *normal cartilage* being subjected to abnormal loading
 - All of the above?



Time

Challenges of OA Drug Development

- There is a recognized discordance between structural changes and signs, symptoms and function
- There remains a lack of standard definitions of disease progression by x-ray, MRI, or other techniques
- There remains an absence of measured endpoints to reliably demonstrate that a product alters OA disease progression

Challenges of OA Drug Development

- These complex and variable pathologic changes lead to significant pain, impaired function and ultimately to long-term disability and in some joint replacement
- It remains unclear what magnitude of change in measured structural endpoints would translate to a clinically meaningful benefit to patients
 - i.e., reliably predict both reduced pain and increased function or prolonged time to end-stage disease or a composite of symptoms and TJR

Considerations for OA Drug Development

- Accepting structural endpoints as valid outcome measures for accelerated approval
- Substantial confidence exists that a change in the proposed structural endpoint will reliably predict an effect on the clinical outcomes
 - Based on empirical evidence from randomized, controlled comparisons from clinical trials
 - Based on a comprehensive understanding of the disease process and product mechanism of action

Goals of a Structure Modifying Development Program

- The ultimate goal of treatment is to impact structural damage, specifically targeting the underlying pathophysiology associated with OA resulting in avoidance or significant delay of the complications of joint failure
 - The need for joint replacement?
- Decrease the worsening of function and pain
 - Either of these might be important clinically relevant outcomes

An Example of a Structure Modifying Trial

- Risedronate in the treatment of OA
- 23,000 patients screened with 2,300 recruited into trial for 2 years
- Signs and symptoms and fluoroscopically positioned specialized x-ray with central reading
- Post hoc small number of patients who were determined to be rapid progressors evidenced structural modification, but not able to be identified at start of trial and not linked to symptom benefit

Bingham CO III, 2006; Arthritis Rheum 54: 3494-3507

What Did We Learn from the Risedronate Trial or Other Similar Experiences?

- The trial was large and long
- It was an expensive experiment
- Some patients were measurably progressive in damage during the window of the clinical trial
- Other patients did not progress at all
- Examining the enrollment information there was no data to inform which patients would progress and which would not

What Did We Learn from the Risedronate Trial or Other Similar Experiences? (cont.)

- Some patients did benefit in terms of symptoms, but was that measured benefit associated with structural x-ray measured benefit?
- Could a single trial be powered to demonstrate both a symptomatic benefit as well as a structural benefit?
- Could structural benefit once measured be associated with a delayed clinical benefit?

Achieving Evidence for Structural Benefit Linked to Clinical Benefit



Abbreviations:

PRO: (meaningful) patient reported outcome (how a patient feels, functions, survives)

S: surrogate (biomarker)

OO: observational outcome (e.g. joint replacement)

Achieving Evidence for Structural Benefit Linked to Clinical Benefit



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PRO: (meaningful) patient reported outcome (how a patient feels, functions, survives)

- S: surrogate (biomarker)
- **OO:** observational outcome (e.g. joint replacement)

*Study Population contains SOME or NONE of the Original Trial subjects as a nested cohort

Conclusions

- OA has significant patient impact with pain, loss of function, consequent increased disability along with significant risk of increased mortality, in some patients
- OA affects a large population
- Developing drugs to alter the complex structures involved in the joint will be difficult
 - Target cartilage?
 - Decrease loss?
 - Stimulate new cartilage growth?
 - Target subchondral bone? And show what?
 - Both? And do changes link to how a patient feels, functions or survives?



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