Karl Schwartz
496 Patriot Circle
Nazareth, PA 18064

October 24, 2022

Re: Docket No. FDA-2022-P-0324

Dear Mr. Schwartz:

This letter responds to your citizen petition, which was received by the Food and Drug Administration (FDA or Agency) on March 11, 2022 (Petition). The Petition requests that FDA amend the 2018 guidance for industry titled *Clinical Trial Endpoints for the Approval of Cancer Drugs and Biologics* (2018 Guidance) to require or strongly urge supplementary comparison of Qualify of Life-related patient-reported outcome (QoL-PRO) measures for certain surrogate endpoints in cancer clinical trials. Specifically, the Petition requests that in amending the 2018 Guidance, FDA take the following actions:

- Provide guidance to clinical trialists, drug sponsors, and Institutional Review Boards regarding the need to capture and compare QoL-PROs as secondary (supplemental) endpoints – particularly when the primary endpoint is a surrogate for clinical benefit based on tumor imaging.

- Help to set standards for secondary QoL-PRO reporting, beginning with ClinicalTrials.gov. This so that what is reported can be readily utilized to interpret the study results in order to guide clinical practice and better-informed patient choice.

(Petition at 6).

FDA has carefully considered your Petition and acknowledges the importance of the issues it raises. Incorporating the patient voice into regulatory decision-making is a priority for FDA. Although PRO measures are not the focus of the 2018 Guidance, in June 2021, FDA published the draft guidance for industry titled *Core Patient-Reported Outcomes in Cancer Clinical Trials* (Core Outcomes Guidance).[1] In the Core Outcomes Guidance, FDA acknowledges the potential added value of incorporating PRO measures of symptoms and functional impacts into the benefit/risk assessment in appropriately designed oncology trials and provides methodological advice to trialists/sponsors on ways to do so. Specifically, the draft guidance provides recommendations regarding appropriate PRO instrument selection and trial design in oncology trials. FDA encourages its stakeholders to review and comment on the draft guidance as we work towards finalizing the guidance.

[1] When final, this guidance will represent FDA's current thinking on this topic.

The Agency has also been engaged in robust efforts to facilitate the inclusion of methodologically sound patient experience data into regulatory decision-making. The following highlights some of these activities:

- FDA is developing a series of four methodological patient-focused drug development (PFDD) guidance documents to address, in a stepwise manner, how stakeholders can collect and submit patient experience data and other relevant information from patients and caregivers for medical product development and regulatory decision making. This series of guidance documents is intended to facilitate the advancement and use of systematic approaches to collect and use robust and meaningful patient and caregiver input that can better inform medical product development and regulatory decision making. This guidance series can be applied to oncologic drug development.

- FDA's Oncology Center of Excellence (OCE), the Center for Drug Evaluation and Research, and the Center for Biologics Evaluation and Research frequently participate in workshops, meetings, and consortia with multiple stakeholder groups, including patients and patient advocates, to improve the collection of data relating to patient experience in clinical trials. Since 2018, the quality and quantity of patient reported outcome (PRO) data collected in trials has improved significantly due to FDA participation in multistakeholder groups.

- In 2020, the OCE established the Project Patient Voice, which is an online platform for patients, caregivers, and health care providers to access patient-reported symptom data collected from cancer clinical trials. More information about Project Patient Voice is available on the FDA web page here: https://www.fda.gov/about-fda/oncology-center-excellence/project-patient-voice.

- Each year, the Oncology Center of Excellence hosts a workshop to discuss topics to improve the collection, analysis, and communication of patient-reported outcomes in oncology clinical trials. In 2021, the topic was assessment of patient-reported physical functioning in registrational cancer trials. In 2022, the topic discussed was assessment of patient-reported tolerability from open label oncology trials. Recordings of all workshops are available under "past and upcoming events" on the OCE PFDD website.

Regarding the Petition's request to revise the 2018 Guidance, under FDA's good guidance practices regulation at § 10.115 (21 CFR 10.115), FDA has established a process for its stakeholders to comment on existing FDA guidance, including suggestions to revise or withdraw a guidance. Specifically, under § 10.114(f)(4) and (6), stakeholders can at any time suggest that FDA revise or withdraw a guidance by contacting the center or office responsible for the regulatory activity covered by the guidance document. The process for submitting the request to revise or withdraw a guidance is to submit a comment to the existing docket for that guidance on www.regulations.gov. The docket number for the 2018 Guidance is FDA-2005-D-0225, which you can access here: https://www.regulations.gov/document/FDA-2005-D-0225-0008. If you submit a comment to the docket for the 2018 Guidance, FDA will consider the comment in accordance with its good guidance practices.

At this time, we are not taking the actions you requested in the Petition. Therefore, in accordance with 21 CFR 10.30(e), your Petition is denied. However, as we describe above, patients are at the core of our mission at FDA and we will consider the information provided in the Petition as part of our continuing efforts to support the patient perspective in regulatory decision-making.

Sincerely,

Douglas C. Throckmorton -S

Digitally signed by Douglas C. Throckmorton -S
Date: 2022.10.24 13:56:28 -04'00'

Patrizia Cavazzoni, M.D.
Director
Center for Drug Evaluation and Research