

the next lecture will be by dr robert
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the genomic and targeted therapy group
at the fda

in his current position dr shuck
contributes to the regulatory review of
investigational new drug applications
to effectively utilize genomic and
biomarkerbased strategies in drug
development and regulatory evaluation
prior to joining the fda robert received
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pharmaceutical science at the university
of north carolina school of pharmacy

please enjoy todays lecture

hi my name is robert shook im a
clinical pharmacologist in the center
for drug evaluation and research at the
fda and today well be speaking about

biomarkers of drug effects
going to break the lecture up into three
separate parts im first going to
discuss biomarker definitions and

utility ill then go on to discuss the
use of biomarkers in drug development
including pharmacodynamic biomarkers as
well as surrogate biomarkers and then
were going to discuss briefly some
regulatory considerations in the use of
biomarkers

so the first section will be on will be
the definitions and utility of
biomarkers

so what is a biomarker a biomarker which
is short for biological marker generally
refers to a measurable indicator of some
biological state or condition

biomarkers are often measured and
evaluated to examine normal biological
processes pathogenic processes or
pharmacopharmacological responses to a
therapeutic intervention and biomarkers
are used in many scientific fields as
well as medical practice so theyre used
both in in science and drug development
as well as in clinical practice in the
care of patients

biomarkers are not new however the
application of novel biomarkers in drug

development and regulatory decision making is a current area of focus for many healthcare stakeholders including pharmaceutical industry academia health authorities and patient advocacy groups so in addition over the last decade or so there have been numerous technological advances in our ability to measure and quantify biomarkers so this has led to the discovery of many new biomarkers and many new techniques such as next generation sequencing have led to this being a very active area of research currently and were trying to figure out how best to utilize biomarkers both in patient care as well as in drug development to improve efficiency and improve care so why are biomarkers important in the clinical setting biomarkers allow us to diagnose disease which is the foundation of therapy they allow us to monitor the disease process you can determine if a patient is getting better or getting worse and adjust their therapy accordingly

they're used to monitor response and toxicity to therapies so you can determine if a patient has too high or too low of a dose potentially and then go on to adjust that dose to have an appropriate therapeutic window for that patient

in the therapeutic product development setting biomarkers can inform the safety and pharmacologic activity in early nonclinical studies of a drug or of a candidate drug

they can be used for proof of concept in early clinical studies to demonstrate that your drug is getting to the target site and having some sort of action

they can be used to determine doses for later confirmatory efficacy trials

they can be used to actually demonstrate efficacy in later phase studies if it's a surrogate biomarker which I'll discuss in more detail in the next section

and also they can be used to demonstrate toxicity in all stages of drug

development

so despite the widespread use of
biomarkers until recently there was not
a wellaccepted standardized definition
in for biomarkers or categories of
biomarkers for their use so a couple of
years ago the nih and fda collaborated
to create a biomarker working group and
they created what they call the best
resource and this stands for biomarkers
endpoints and others other tools
resource and what this is is a glossary
of terminology and uses of biomarkers
and endpoints in basic biomedical
research medical product development and
clinical care this is a freely publicly
available resource its available at the
link thats on the slide thats
currently being shown so you can go and
access that and its actually meant to
be a living document so its going to be
updated from time to time as the field
evolves
so best defines biomarker as a defined
characteristic that is measured as an
indicator of normal biological processes

pathogenic processes or response to an
exposure or intervention including
therapeutic interventions and they
recognize five different types of
biomarkers including molecular so this
could be a genotype of a patient
histologic so this could be information
from a
slide from a tumor
biopsy

radiographic biomarkers such as imaging
biomarkers again very useful in oncology
as well as other settings and
physiologic characteristics so this
could be something such as blood
pressure

this slide has several examples of
biomarkers these are what are considered
traditional or standard biomarkers
youve probably all heard of all of
these

things such as blood glucose and
cholesterol are measured in medical
practice as well as used in the drug
development setting

things such as transaminases bilirubin

and alk foss are used to assess liver
function serum creatinines creatinine
clearance and cystatin c can all be used
to assess kidney function and again
these are traditional biomarkers that
have been found acceptable over time
through clinical experience and weight
of evidence so theyre well accepted in
many different settings people arent
really going to question their use
theyve got many different uses however
not all biomarkers going to are going to
have this level of data and this history
of of use in medical in medical the
medical setting
so theres a need to develop standards
to
to standardize these biomarkers so that
they can be used within certain contexts
in drug development and ill discuss
that in the third section today
so the last slide showed many different
types of standard biomarkers but i want
to point out that a biomarker can take
on many different forms so this is a
slide with different biomarkers for

cardiovascular disease and organizes them into several different categories based on what they're used for so they recognize functional biomarkers and these can be things such as exercise testing or assessments of endothelial function or vascular function they recognize quality of life biomarkers so this could be the results of a patient reported outcome questionnaire could be

considered a biomarker

a medical device derived biomarkers so things so information that's gained from things such as implanted icds or sensor patches can be considered a biomarker

imaging biomarkers again

echocardiography or mri can be

biomarkers and lastly molecular

biomarkers and this again is the the category that's probably gotten the most attention recently due to advances in technologies these are things such as proteins peptides mrnas or genetics they can be measured in blood or urine samples

and these can also be very useful

biomarkers

similarly this slide shows different
potential biomarkers for prostate cancer

and this is

organized by the where the biomarkers
are originate so the imaging biomarkers
such as trans rectal ultrasound or ct or
mri or pet imaging

serum biomarker so you can look at
circulating tumor cells in the serum as
well as molecular analyses and dna and
rna

the tissue biopsy biomarkers so
histopathology information gleason score
immunohistochemistry or you can do
molecular analyses actually on the tumor
tissue to look for somatic mutations and
changes in gene expression and lastly

urine biomarkers so theres many
different metabolites that are useful to
measuring urine for prostate cancer
patients so biomarkers can take on a
very broad array of things not just the
traditional biomarkers that youve
likely heard of such as blood pressure

and glucose

so best recognizes eight different categories or categories of biomarkers and they can be used for many different things so susceptibility biomarkers can inform whether or not you'll develop a disease

an example of this would be brca mutations for breast cancer they can inform the the lifetime risk of a patient for developing breast cancer a diagnosis of disease so do i have an actual disease so glomerular filtration rate in chronic kidney is diagnostic of chronic kidney disease

prognosis so how will i live longer psa changes can be informative a prognosis for prostate cancer

prediction well i respond to treatment so certain braf mutations for some melanoma treatments can inform your likelihood of response to that drug so if you have that predictive mutation you might that might be a good drug for you whereas if you don't have that predictive mutation then the drug you're unlikely to respond to that drug and

therefore a different line of therapy
would be more appropriate so that a
predictive biomarker
response so did the treatment work so an
example of this would be inr as a as for
a response of warfarin in the treatment
of stroke or in the reduction of risk of
stroke so inr within a certain window is
informative of a likelihood and a
decrease of your risk for stroke
so this can inform whether or not the
treatment is working appropriately
monitoring has the condition changed hiv
rna levels are commonly measured in hiv
and aids patients to monitor disease
process
and safety biomarkers so am i having an
adverse event so alt levels can be
informative of whether hepatotoxicity is
occurring at a very early stage and
therefore you can monitor this as a
safety biomarker and potentially stop
the drug or alter the dose to prevent
worse hepatotoxicity from occurring
and lastly id like to just note that
these functions are not mutually

exclusive so there's a lot of overlap in these so for example I used INR as a response biomarker for warfarin in the reduction of the risk of stroke however this is also considered a monitoring biomarker because patients that are taking warfarin they monitor their INR regularly to make sure they're in the appropriate therapeutic window and it could also even be considered a safety biomarker because if INR goes above a certain level it increases your risk for bleeds and therefore it could be considered a safety biomarker for that drug as well so these are not mutually exclusive

now that I've discussed the many different categories of biomarkers I want to focus in a little bit more narrowly on the ones that are considered that could be considered efficacy biomarkers or biomarkers of drug effect so the first I want to talk about is a PD or response biomarker so this is a biomarker used to show that a biological response has occurred in an individual

who has been exposed to a medical product or environmental agent an example of this would be sweat chloride can be used as a pharmacodynamic or response biomarker when evaluating patients with cystic fibrosis and its used to assess the response to cystic fibrosis transmembrane regulating regulator potentiating agents also hemoglobin ac may be used as a pharmacodynamic or response biomarker when evaluating patients with diabetes to assess response to antihyperglycemic agents or lifestyle changes and i chose these two examples specifically because the sweat chloride could be considered more of a true pd biomarker we havent actually approved any drugs based on this endpoint in clinical trials yet but it is very informative of whether a cftr potentiating agent is having some activity in a patient on the other hand hemoglobin ac is a little bit more established this biomarker has been actually used to

approve some drugs with some antihyperglycemic agent so it could actually be considered a surrogate biomarker

safety biomarkers so just to point out safety biomarkers can also become a biomarker of an effect its just a biomarker of a negative effect so best defines a safety biomarker as a biomarker measured before or after an exposure to a medical product or an environmental agent to indicate the likelihood presence or extent of toxicity as an adverse effect a couple of examples of these would be hepatic amino transferases and bilirubin may be used as safety biomarkers when evaluating potential hepatotoxicity a neutrophil count may be used as a safety biomarker when evaluating patients on cytotoxic chemotherapy and they can be used to adjust dose determine the need to interrupt therapy or consider the use of growth factors so they can be an early safety signal that you can use to monitor a patient and

adjust the medication accordingly to
prevent a worse toxicity from occurring
surrogate endpoints so best defined
surrogate endpoint as an endpoint that
is used in clinical trials as a
substitute for a measure of how a
patient feels functions or survives
and it actually recognizes three
different categories of surrogates based
on the quantity and quality of evidence
that that supports their use as a
surrogate
so the first is a validated surrogate
endpoint
this is an endpoint that's supported by
a clear mechanistic rationale and
clinical data providing strong evidence
that an effect on the surrogate endpoint
predicts a clinical benefit therefore
this can be used to support traditional
drug approval without the need for
additional efficacy information so this
can be a standalone endpoint in an
efficacy trial for a drug
the next category is reasonably likely
at surrogate endpoint this is an

endpoint supported by clear mechanistic
and or epidemiologic rationale but
insufficient clinical data to show that
that it is a validated clinical endpoint
so in this case we have a little bit
less data indicating that its a valid
surrogate and therefore these endpoints
can be used for accelerated approval of
drugs for expedited access for medical
devices and ill cover the difference
between traditional and accelerated
approval a little bit more in depth in
the next section but a reasonably likely
surrogate can be used for accelerated
approval purposes

the last category is a candidate
surrogate endpoint and this is an
endpoint thats still under evaluation
for his ability to predict a clinical
benefit so this could be anything that
has some data showing that its a
potential surrogate but not enough data
to truly be able to know how it can
effectively be used or appropriately be
used

next id like to cover some examples so

an example of a validated surrogate
endpoint would be blood pressure
reduction is a validated surrogate
endpoint for reduction in rates of
stroke myocardial infarction and
mortality and has been used for the
basis of approval for drugs intended to
treat hypertension

so this slide shows the example of some
data that can be used to demonstrate
that a surrogate is a validated
surrogate and it has each of these dots
on the slide actually is a clinical
trial endpoint not an individual patient
and they shield it across all these
different clinical trials which many of
these are many tens of thousands of
patients overall i believe that
representation is over a half a million
patients included in these clinical
trials and they show that theres a
relationship between on the xaxis the
the blood pressure reduction that was
observed in these trials and on the
yaxis the wa the odds ratio of a
cardiovascular event so you can see

across multiple different trials that
had multiple different drugs from
multiple different drug classes we see
that this blood pressure lowering effect
reduces our risk of cardiovascular
events and this is great data to show
that this is a validated surrogate
endpoint for
for antihypertensive agents
now an example of a reasonably likely
surrogate endpoint theres a couple of
these on this slide including
radiographic evidence of tumor shrinkage
so this would be response rate as well
as progressionfree survival and certain
cancer types have been considered
reasonably likely to predict an
improvement in overall survival with
certain therapies and therefore theyve
been used to support accelerated
approval of drugs to treat these cancer
types so in some cancers but not all
cancers we consider radiographic
evidence of tumor shrinkage to be a
reasonably likely surrogate

second example is outcomes of sixmonth

followup treatment so sputum cultures
and infection relapse rate have been
considered reasonably likely to predict
the resolution of pulmonary tuberculosis
and have been against used to support
accelerated approval of drugs to treat
tuberculosis

and theres no node graph showing all
the different data on these and these
ones because again if there was that
sort of data supporting it it would be
considered a validated surrogate theres
not quite as much data so its
considered a reasonably likely surrogate
for these two examples and i wont cover
candidate surrogate biomarkers because
again these could be you know anything
with some data indicating that its a
potential surrogate but not enough that
we know how we can can effectively
utilize them

so now that ive covered the definitions
and utility of biomarkers id like to to
go over using biomarkers in drug
development and how they can be
effectively utilized in clinical trials

this slide shows the outcomes of a study that was conducted a few years ago at astrazeneca and what they did was they looked through they looked over their product portfolio for the previous few years and they tried to determine what the key contributors to drug development success were and the things that they identified as identifying successful projects as opposed to projects that did not make it to market or projects that were considered failures were having the right target the right tissue the right safety profile the right patients identified for the for the drug and the right commercial potential and what i want to point out here is that in order to determine these things youve got to be able to have some kind of data to support whether or not you have the right target the right tissue the right safety profile etc and all biomarkers can be utilized to inform virtually all of these things and ive underlined on the slide the examples where they specifically mention

having biomarkers to determine these things but its not really limited to those theres many of the other things that are listed on this slide can be can be informed by appropriate use of biomarkers so this is why biomarkers are considered so important in drug development setting

im not sure what experience everybody has with clinical studies but to to discuss the use of biomarkers throughout drug development we need to kind of make sure that were on the same page as far as the different phases of clinical studies so i briefly want to cover that in this slide

so phase one clinical studies are the initial introduction of an investigational new drug into humans these are frequently in healthy subjects and the goal of these is to obtain some pharmacokinetic pharmacodynamic and safety information to design scientifically valid phase two studies now your phase two studies are your early controlled studies to get

information on the drugs effectiveness
in the target patient population so here
were moving into patients studies are
slightly larger usually and theyre in
the actual target patient population to
determine if the drug is having the
appropriate effect

and lastly phase three studies are your
adequate and wellcontrolled studies to
gather information about effectiveness
and safety that is needed to evaluate
the overall benefit risk

relationship for the drug for marketing
so overall your goal here is to
demonstrate substantial evidence of
effectiveness and a positive benefit
risk profile in order to get the drug on
the market

so how are drugs approved under the food
drug and cosmetic act states that the
fda cannot approve an application to
market a drug unless there is
substantial evidence that the drug will
have the effect it purports to have
and this evidence of efficacy is
primarily derived from adequate and

well-controlled clinical trials that demonstrate improvement based on a clinical endpoint that directly measures how a person feels, functions or survives so those are that's a very important concept these fields, functions are survival endpoints are considered clinical endpoints they're often referred to as hard outcomes in clinical studies so if you improve how a patient feels such as reduction in pain, how they function such as improvement and activities of daily living or six-minute walk tests or something of that sort that's a measure of function or how long they survive those are considered clinical advocacy endpoints and are generally the basis for drug approval however there are exceptions built into this where well-established surrogate endpoints can be used to approve a drug however this term is not defined but this would kind of be the category of the validated surrogate endpoints under best and

reasonably likely surrogate endpoints
under the accelerated approval program
so the accelerated approval program is
meant to address diseases that are
serious medical conditions where there's
an unmet medical need so a
patient population that doesn't have any
drugs available with a serious disease
they allow reasonably likely surrogates
to be the basis of approval under the
accelerated approval program to get
those patients a drug the drug
however this does require a confirmation
study so in the postmarket setting they
have to do a confirmation study on a
clinical endpoint that survives clinical
endpoint in order to maintain marketing
for that drug

so how can biomarkers be used to inform
drug development they can be used in
virtually every different stage so even
back in the preclinical studies in your
basic clinical research or your basic research
when you're trying to identify pathways
and identify potential drugs they can
inform drug target selection so what

what pathway you want to target for a certain disease they can inform the drugs mechanism of action once you get into clinical studies they can be used in in phase one through three as well as even in in postapproval studies to stratify patients so if theres a predictive or prognostic biomarker that you think might affect your outcomes and you want to make sure that you have equal numbers of patients in in each group in your in your drug group and in the placebo or in the comparator group you can stratify patients and this can eliminate some noise from your clinical studies they can be used for safety assessments for patient selection and enrichment to help determine the appropriate dose selection as well as again in efficacy assessments so how are efficacy biomarkers used in drug development basically theyre used to measure response to a treatment and this can take on several different forms in your earlier phase studies they can be used to establish a biological effect

this would be a use of a pharmacodynamic

biomarker in early trials and this

basically shows target engagement your

drug is getting to the target and its

having some sort of effect that you

consider desirable

they also can be used to determine

suitable doses and regimens to carry

forward into later phase studies

and lastly they can be used to replace

health outcome endpoints and this again

would be the surrogate endpoints in in

later phase trials

the idea here the the promise of of

using surrogate biomarkers is that they

promise to shorten clinical trials and

reduce trial size and the way that they

do this is that generally your your

surrogate biomarker the change in that

is going to occur at a time point before

the actual clinical endpoint is going to

occur so you can have a shorter trial

they can also be re used to reduce trial

size because generally a surrogate

biomarker is going to have less noise

associated with it than a true clinical

endpoint so it as a survival endpoint is very hard to demonstrate because not only is your drug having an effect on that but patients lifestyle and things of that sort are also impacting the the clinical efficacy endpoint so therefore a surrogate biomarker can be used to reduce the trial size because theres going to be less noise surrounding that end point so shorter clinical trials and smaller clinical trials can be much more efficient because the larger and the longer clinical trials get the more expensive they are and the harder they are to conduct

and also again the basis for accelerated approval under the accelerator approval program and also can often support full approval in the case of validated surrogate endpoints heres an example of the use of biomarkers to determine dose so this is the drug belimab which is a b lymphocyte stimulator inhibitor so it exerts its effect through lowering b cell counts

and they in this case they looked over
multiple different b cell subsets and
they looked over a couple of different
doses

and they used this data to determine
that the higher dose was having a
greater effect on the b cell subsets and
they use this information to help inform
their dose and ultimately the approval
of the drug

so how are safety biomarkers used in
drug development safety biomarkers are
used to identify and monitor potential
drugrelated toxicities so in early
phase animal studies you can conduct
toxicogenomic studies to evaluate safety
they can also be used to help determine
the starting dose for first in human
trials so this is calculated from the no
observed adverse effect level or noel in
toxicology studies and biomarkers can be
can be used to inform this and then you
base your first and human starting dose
on that

they can be used to identify monitor and
avoid toxicities in clinical trials

and they can again also be used to
determine the appropriate dose so you
want to have a dose below you when you
start seeing toxicity and in some cases
they can actually be used to inform dose
reduction schemes so this is very common
particularly in oncology and diseases
where we dose at the very high end of
the dose response curve where because
the disease is very severe were trying
to squeeze every bit of efficacy out of
that drug and were willing to tolerate
some some safety or adverse events and
therefore you can use biomarkers to
monitor safety biomarkers to monitor
potential toxicities and before you have
a clinical issue occur you can adjust
the dose or have a dose interruption for
that drug
so here we have a very simplistic view
of drug effects
and when were trying to determine which
biomarker we want to look at in drug
development the simplistic view would
have the drug interacting with the
target

this then leads to some change in a
biomarker which then is predictive of
your clinical outcome so how the patient
feels functions or survives
however biology is rarely that simple so
this is a more realistic view of how of
how biomarkers change in response to a
drug so here you have the drug
interacting with a target
this myriad of changes occur in
different biological pathways some are
in the causative pathway some might be
parallel some are in
sequence with each other and then you
know the changes in these these
biological pathways ultimately produce
some change in clinical outcome and
again how a patient feels functions or
survives so any of these green or red
dots here could be a potential biomarker
that we would measure in drug
development to determine if our drug is
having an effect
and therefore we need to decide which
one or ones we want to look at and this
can the basis of this can be based on

what we actually want to show depending
on where we are at in drug development
and will cover that over the next couple
of slides

so here is an example of efficacy
biomarker for an ACE inhibitor so here we
have the

renin-angiotensin-aldosterone pathway
and this is also again a simplified look
at that but most of the important

components are here so in the renal
angiotensin-aldosterone pathway we have

angiotensinogen is converted by renin
into angiotensin I the angiotensin
converting enzyme then converts
angiotensin I into angiotensin II

which acts via the angiotensin II
receptor to cause aldosterone secretion

sodium and fluid retention sympathetic
nervous system activation and

vasoconstriction this leads to an
increase in blood pressure and this
causes hypertension so hypertension
although recognized as a disease is also

in itself kind of a biomarker or a
surrogate of increased risk for stroke

and cardiovascular events

so ace inhibitors are drugs that inhibit
this angiotensin converting enzyme from
converting angiotensin one into
angiotensin ii

so anything downstream of here could be
a potential biomarker to show efficacy
or drug effect with an ace inhibitor
so one potential biomarker assuming that
there was an analytically validated way
to measure it would be angiotensin ii
so the advantage is that angiotensin
is very proximal to the drug target
however its very distal from the
clinical outcome

so this would make it a candidate
biomarker to demonstrate drug activity
however it makes it a poor candidate as
a surrogate biomarker and the reason for
this is because its very proximal to
where our drug is having its action its
actually the the product of the enzyme
that were inhibiting
it can be very sensitive to inhibition
of that enzyme

however because its so far from our

outcome of hypertension a lot of different things have to happen before the drug actually exerts that clinical effect and a lot of compensatory things can kick in and other things can happen that actually prevent the drug from ultimately having the effect on hypertension so it would be a poor surrogate outcome because so much has to happen before that that out that clinical efficacy actually occurs but its a very sensitive mile marker to demonstrate drug activity so we could use this in our early studies as a pharmacodynamic biomarker to show that our drug is getting to the target site of action potentially informed doses for our later face studies now alternatively we could look at blood pressure as a biomarker of effect for an ace inhibitor now blood pressure in contrast to angiotensin ii is very distal from the drug target but its very proximal to the clinical outcome this makes it a good candidate surrogate biomarker however its problematic

biomarker for demonstrating drug activity and the reason for this is again because so much has to happen between the the inhibition of the enzyme and and the the change in blood pressure that a lot of compensatory things can kick in and its very its going to take a larger study with more patients to show an effect on this biomarker so when youre in an early phase study you might not want to invest that much into a very large study with a lot of patients to demonstrate that it that it has a change in blood pressure

so you might instead monitor angiotensin ii again as a pharmacodynamic biomarker whereas when you get to your later face studies and youre trying to truly show an effect this would be a candidate surrogate biomarker to look at in your later phase efficacy studies

so returning to our simplistic view of drug effects after the drug interacts with this target we have a choice of many different biomarkers that might change in response to that that are

ultimately we hope predict clinical
outcome but where that biomarker is and
what properties it have it has can
affect how we want to use utilize it for
drug development
now that ive covered the the different
types of biomarkers and pharmacodynamic
biomarkers versus candidate surrogate
biomarkers i want to discuss
the issues associated with using
surrogate biomarkers in in drug
development programs so again surrogate
endpoints are defined as an endpoint
that is used in clinical trials as a
substitute for a direct measure of how a
patient feels functions or survives
different factors that should be
considered when youre deciding whether
or not to use a surrogate endpoint would
be biological plausibility
its success in previous clinical trials
and predicting outcomes
and the risk benefit and public health
considerations of the drug so this is an
actual related the biomarker but its
more of a public health consideration

and a standard of care uh how how the
medical practice is currently
occurring in this patient in the patient
population that you're interested in
so for biological possibility things
that favor the use of surrogate include
epidemiological evidence that's
extensive and consistent across studies
a quantitative relationship
a credible animal model to show drug
response and a well-understood disease
pathogenesis and drug mechanism of
action and also again the surrogate
being relatively late on the biological
path
things that do not favor surrogates in
terms of biological plausibility are
basically all the opposites of that so
inconsistent epidemiology
no quantitative epidemiological
relationship no animal model unclear
pathogenesis and unclear drug mechanism
and the research the surrogate being
remote from the clinical outcome
as far as clinical trials success so
effect on a surrogate has predicted

outcome with other drugs of the same pharmacological class this can be supportive of it being a surrogate for another drug in that same class whereas if there's an effect on surrogate has predicted outcome in several different classes this supports more general use so this would be the difference between say for an antihypertensive drug if you had a diuretic and it had only been shown to predict outcomes with other diuretics versus if it had been shown to predict outcomes with other classes such as ACE inhibitors and calcium channel blockers and other antihypertensive agents that would support more general use for another antihypertensive agent from another class

things that don't favor the use of surrogates in clinical trials would again be the opposite so negative outcomes in clinical trials without a clear explanation for that as well as inconsistent results across

drug classes

so the last factor here that is discussed is the risk benefit and public health considerations so in cases where you have a disease that's serious or life threatening with no alternative therapies you're going to be more likely to accept a surrogate for that type of a disease because the stakes are we really want to get patients those drugs and therefore were willing to accept a little bit of uncertainty for the efficacy because we we those patients have no other alternatives available to them a large safety database again if the drug has been shown to be very safe and were confident in that it's more likely to use a surrogate short term use of the drug as well as if there's difficulty in studying the clinical endpoint things that do not favor the use of a surrogate in terms of public health considerations or a nonserious disease and if there's alternative alternatives

available for patients with that disease

a little safety data so if we were not
confident in the safety profile we want
to see improvements in those hard
outcomes or clinical efficacy endpoints

longterm use of the drug
and if the clinical endpoint is
easy to study there's no reason to use a
surrogate instead you can just study the

clinical outcome
and lastly if there's a long delayed
small effect in relatively healthy
patients this would not support the use
of a surrogate

so the next few slides here are adopted
from a paper by Dr Thomas Fleming who
has spoken extensively on the
subject of surrogates if you're
interested in surrogates at all I highly
recommend that you read the
reference there and he has a couple of
other papers which are fairly easy to
identify or defined as well

he has many different informative papers
on this subject but I'll attempt
to go through some of the main

considerations that he lists and the cautions for use of surrogates and the reason that we often have to be cautious is because there's a lot of candidate surrogate biomarkers that are biologically plausible and they seem like they're they're sure to predict the clinical outcome however there's reasons that they often fail to be uh end up being validated surrogates and several of these are discussed over the next couple of slides

um the first one so in the first case here at the top of the slide were discussing the transmission of hiv from mother to child so in this case we have hiv viral load is causative of that transmission of hiv from mother to child however many things are going to also be correlated with hiv viral loads such as cd so if you have a biomarker such as cd it's also going to look like it's associated with the transmission however we have a drug that affects our cd levels without impacting hiv viral load it's

not going to affect that transmission
the example at the bottom of the slide
is fairly similar so tumor burden is
causative of cancer symptoms and death
and but there are many biomarkers that
are going to be associated with with
tumor burden such as cea or psa so if we
were to have a drug that were to affect
those those biomarkers ca or psa without
actually impacting the tumor burden of
the patient its not going to go on to
to

change the cancer symptoms or likelihood
of death in those patients so if its
correlated with the the true with a true
biomarker or if its correlated with the
clinical outcome but its not in a
causative pathway that could it could
lead to it not being a good surrogate
the second slide for caution of
surrogates here discusses a couple of
different issues

so the the example on top in this detail
this example is discussed in detail on
the paper

however it discusses patients the

patient population is post myocardial infarction and the use of thrombolytic agents so in this example they discuss they have a novel thrombolytic agent in a smaller phase two study it had a better impact on the what they were considering as a surrogate outcome of timmy blood flow which is a measure of blood flow to the myocardium which is considered a surrogate for 0day mortality so their novel drug had had a better effect at i believe it was the 0 and 90minute endpoint or time points on timi blood flow so they their hypothesis based on that was that this would lead to a better 0day mortality outcome with their novel drug however when they ran their larger phase study they showed that it was actually numerically worse than the older agent and that it did not in fact go on to improve 0day mortality so they investigated the reason for this and possible causes and one thing that they discovered was that in that initial phase two study

the the novel agent didnt actually had
inferior improvement in timi blood flow
at the 0 minute time point so perhaps
having that earlier restoration of blood
flow was actually more important than
the the greater magnitude at the later
time points and therefore this was
unable to predict 0day mortality so
even though it seemed like a
great potential surrogate outcome not
measuring it at potentially the correct
time point led to this not being a
validated surrogate for this disease
and because they monitored the clinical
outcome they were able to determine this
uh the example on the bottom kind of
gets at the the opposite situation and
that is youre youre by using a
surrogate you can sometimes potentially
lead to the conclusion that your drug
does not have an effect when in fact it
does so they start they discuss a study
for in chronic granulomatous disease
and they were using an interferon gamma
as an agent and they considered using
bacterial killing to prevent recurrent

as a surrogate for recurrent serious
infections

they ended up actually looking at the
clinical outcome instead and that was a
good thing because interferon gamma did
not have an effect on bacterial killing
but actually did have an important
effect on recurrent serious infections
so the case here is that you have
actually multiple causal
pathways that are leading to the
clinical outcome of recurrent serious
infections and interferon gamma affected
one of these that was not captured by
the surrogate or the potential surrogate
of bacterial killing so again it can
also lead to a false conclusion that
your drug does not have a positive
effect when in fact it does
and the last slide the the last figure
in this paper that i want to cover is
this discusses the situation where you
have an intervention that has an effect
on a biomarker which you believe
predicts a true clinical endpoint
however the drug might also have art

offtarget effects that could then
cancel out the benefit that you're
observing uh based on the biomarker so
an example of this would be to stick
with hypertension since i've discussed
that in a few different ways a diuretic
might have a positive impact on the
biomarker of blood pressure which
predicts the true clinical endpoint

however if it caused a lot of
hypokalemia which is a known side effect
of many diuretics this could potentially
cause negative effects which would then
cancel out the true clinical endpoint
benefit

so i've discussed in detail a lot of
aspects of surrogate endpoints as well
as pharmacodynamic endpoints so to
quickly summarize these and summarize

the takehome message
surrogate endpoints are important in
drug development because they can
increase clinical trial efficiency it
does this via shorter duration of trials
because the surrogate general the change
in the surrogate will generally occur at

an earlier time point than the change in
the clinical efficacy outcome and it can
do this using fewer patients so you can
power your trial with less patients to
show the benefit that you want to show
this this really leads to much more
efficient drug development
factors that favor surrogate use include
biological plausibility success in
predicting outcomes for multiple drugs
and drug classes and unmet medical needs
for the patient population
however caution is generally advised
when using surrogates because a lot of
candidate surrogate endpoints do not end
up being great predictors of the
clinical efficacy outcome
and again many many surrogate biomarkers
are ultimately shown to be poor
surrogates
so before i move on to the next section
i want to briefly just discuss the
considerations for measuring biomarkers
so measuring biomarkers is often
overlooked but this is extremely
important so whether were in the

clinical care setting where we were making judgments on how we were going to treat a patient or whether we were in the drug development setting where we were making decisions as to whether or not to continue investigating a drug for a certain patient population measuring the biomarker accurately is extremely important because these are important decisions and we want to make sure that we were accurately measuring and that we were doing what we think we were doing before we use that those data to make those decisions so appropriate sample collection processing and storage are all critical to ensure validity of results inappropriate can be uh can mean different things in different situations so whether you're measuring rna versus dna you might have to have different procedures in place for your sample collection and processing and storage whether you're measuring something in blood versus urine for instance can can have an effect on what appropriate

sample collection and processing and
storage is
analytically validated assays should be
used for quantification of biomarkers
that are used for drug development and
or regulatory decisions and again so
going back to the best definition best
defines analytical validation as
establishing that the performance
characteristic of a test tool or
instrument are acceptable in terms of
sensitivity specificity accuracy
precision and other relevant performance
characteristics using a specified
technical protocol which may include the
specimen collection handling and storage procedures
uh so just to point out this is
validation that the tests uh tool or
instruments technical performance it is
not validation of its usefulness so
again this is simply the you're
validating the measurement of the
biomarker that you're measuring what you
think you're measuring
it doesn't necessarily mean that just

because you're measuring a biomarker
that it's the appropriate biomarker
to use in a certain situation it just
means that the analytical data are going
to be reliable

so the last thing that I would like to
cover briefly

is the biomarker qualification program
which is currently in the center for
drug evaluation and research and the
website link is on this slide that's
being shown currently

if you are interested in the biomarker
qualification process there's much more
information on the website there
I'll briefly uh discover the highlights
or discuss the highlights

so

in many cases standard biomarkers are
not optimal and other biomarkers may
offer better attributes

however every year there are hundreds of
new biomarkers that are reported in the
literature that are potentially have new
uses uh it can have new uses in drug
development or in clinical practice or

might simply be a better indicator of some process than the current gold standard but how do we know which ones are actually valuable for use and how do these novel biomarkers become the gold standard instead of the ones that were currently using

so theres many historically there have been many different biomarker acceptance pathways probably the most common one uh throughout history is simply scientific community consensus so if theres a biomarker thats a candidate and theres many published articles commenting on that establish its utility

ultimately this will will sometimes lead to guidances by the fda and regulatory acceptance in the in the drug development process or even in the patient care process

and this but this can often take a very long time to establish and many different studies need to be conducted the drug approval process can lead to acceptance of a biomarker but this is generally more narrow so within a

certain drug development program they

might

use a certain biomarker and that's
considered acceptable in that context
how and this could make it into drug
labels and in the reviews that are
conducted by the review staff and
sometimes this will ultimately make it
into guidance however there's often
uncertainty over how exactly this can be
appropriately used

and more recently there's been the
biomarker qualification program so this
is a formal process for biomarker
qualification

it's odd there's several different
guidances are produced on this there's
actual formal FDA review of the
biomarker for its utility and they are
the program often conducts workshops to
discuss the need for the standardization
of data generation

and the data that's needed to qualify a
biomarker within a certain context of
use

so what exactly is qualification

qualification is a conclusion that
within the stated context of use the
biomarker can be relied upon to have a
specific interpretation and application
in drug development and regulatory
review

so what the context of use means is its
a comprehensive statement that fully and
clearly describes the manner and purpose
for of use for the biomarker in drug
development

qualification is a formal regulatory
review and acceptance process of the
biomarker that reaches across all fda
and cedar review divisions so once a
biomarker has been qualified
there you know the different review
divisions wont treat it differently
its qualified for that specific context
of use and can be used across all review
divisions

qualification results in the scientific
acceptance and regulatory certainty and
this is based on a weight of evidence
argument thats presented in the in the
qualification process

what exactly is that process here we
have the biomarker qualification roadmap

the process starts with a letter of
intent this initiates the qualification
process of a biomarker for a proposed
context of use in drug development

next comes a qualification plan this
defines the development of gener uh to
generate the necessary supportive data

to qualify the biomarker for the
proposed context of use

after the the data are generated the
full qualification package is submitted
this contains all accumulated data to
support the qualification of the
biomarker for the proposed context of
use

and lastly theres a qualification
recommendation so this contains the
fdas determination on whether the
biomarker is qualified for the proposed
cou based on a comprehensive review of
the full qualification package so this
is somewhat analogous to drug review
except youre reviewing the utility of
the biomarker within its specific

context of use and it comes to a determination of whether the data are appropriate to support the qualification of the biomarker for whatever the context of use is and the context of use can be very broad it can be everything from a toxicity marker for an animal study to an enrichment biomarker for clinical studies or it could potentially be a surrogate endpoint which we've discussed it could be qualified for use so this slide I don't want to discuss in a ton of detail however it's a list of the biomarkers that have currently been qualified it's fairly short currently but there are many programs in development as of right now and the rate at which we're qualifying them is actually increasing so I just want to point out that it's again the diversity here so there's nonclinical biomarkers as well as clinical biomarkers and I believe the first one that was qualified as the first one on the

page here which is drug-induced
nephrotoxicity biomarkers this is in
preclinical studies
more recently things that have been
qualified are prognostic biomarkers for
enrichment of clinical trials
within dominant polycystic kidney
disease
so there's a broad range of things that
can be qualified for use and this
can be and this is really driven by
you know what the bottlenecks in drug
development can be so if there's
something where
it currently takes a whole lot of data
to demonstrate that something is safe or
something is effective in a certain
patient population then different groups
can focus in and try to develop
biomarkers that can they can solve those
problems more efficiently and this is
often done this can be done by anybody i
would also like to point out so it can
be an individual company could do this
if they wanted to it's often done by
consortia so groups of either academics

or or

industry groups can get together and
pool data to try to make an effort to
qualify a biomarker to help make the
drug development process more efficient
for all of them

so to summarize and
provide some conclusions for the entire
lecture

biomarkers are essential to the practice
of medicine as well as the development
of medical products including drugs
in drug development biomarkers of effect
and safety are used to demonstrate proof
of concept select appropriate doses and
demonstrate efficacy

caution is warranted when using
surrogate endpoints and the biomarker
qualification program can improve
acceptance of biomarkers within a
specific context of use

so with that i would like to say thank
you very much for listening i hope this
has been beneficial to everyone