Simple Complexity in an Evolving World: Rising to the Challenge

Science Board Advisory Committee, 25 October 2002 Philip D. Noguchi, M.D. Acting Director Office of Cellular, Tissue, and Gene Therapies CBER, FDA

Office of Cellular, Tissue and Gene Therapies

- Efforts in counterterrorism
- * Repair, Replace, Restore, Regenerate
 - Human Tissues
 - Finalize rules for framework
 - Hematopoetic Stem cell transplantation
 - *Reviewing data for possible 'deemed' licensing for stem cell facilities
 - **Other Stem Cells (Neural, pancreatic, mesenchymal)**
 - Guidance for stem cells
 - Outreach to stem cell providers
 - Tumor vaccines
 - International Workshop, April 2003
 - Development of guidance

Office of Cellular, Tissue and Gene Therapies

- **❖ Federal "Stone Soup"**
 - Education
 - Comprehensive Clinical Course, ASGT
 - ICH Gene Therapy Workshop
 - Partnerships
 - **♦** Adenovirus Standard (finished and shipping, 2002)
 - NIH Stem cell task force (ongoing)
 - **Xenotransplantation Assay development (ongoing)**
- Patient Centered Therapies

"PATIENT CENTERED THERAPIES"

- Patient defines therapy
- Market share/niche
- Delivery infrastructure evolving
- Financing, product development evolving
- Patient need drives the process

Prototype Patient Centered Therapy

- *X-linked Severe Combined Immunodeficiency Syndrome (X-SCID)
 - Lack of gamma-c chain with consequent lack of cytokine receptors needed for T-cell function
 - Death within first year of life from severe recurrent infections
 - ❖ Transplant of HLA-identical marrow >90 % survival; haploidentical transplant 50-70 %
 - Survivors may still need gamma globulin, unknown long term survival

Gene Therapy For X-SCID

- **❖** In France, 9/11 children showed evidence of immune reconstitution following gene therapy
- Late August 2002, one successfully treated child developed leukemia-like symptoms
- **❖ FDA Biologics Response Modifier Advisory Committee** (BRMAC) reviewed case on 10 October 2002
- Consensus of BRMAC
 - Gene insertion gave both therapeutic effect and caused insertional mutagenesis
 - **❖** Because of potential superior immune reconstitution with gene therapy, studies should proceed with caution with stringent testing for clonal expansion of T-lymphocytes
 - Revision of informed consent process for ALL retroviral gene therapies

Complexity of (a) Gene Therapy Product

Ex Vivo Transduced CD34+ Cells **Expressing GammaC-R for X-SCID Growth factors Murine Retroviral SCF**, Flt-3, IL-3, Vector **PEG-MDF** Fibronectin coated flasks Cord **CD34+ CD34+ transduction Blood** Selection **CD34+** expressing gamma-c receptor

Complexity continued...

- Cord Blood
 - Donor screening, adventitious agents, purity, potency
- Devices
 - Monoclonal antibodies, surface markers, extracellular matrix
- Retroviral Vectors
 - Cell substrates, adventitious agents, reversion to wild type
- Specified Products (SCF, Flt-3, etc)
 - Purity, potency, novel use (ancillary, not as primary effector)
- Cellular Product
 - Characterization, potency, evidence of gene transduction

...learning the lessons of the past will enable the future:

"What can be imagined, will be done"

...with hope
...humility
...patience
...compassion