INTERNATIONAL CONSORTIUM for INNOVATION & QUALITY in PHARMACEUTICAL DEVELOPMENT

Cross-Divisional Guidance for Development of Therapeutics for Severely Debilitating or Life-Threatening (SDLT) Indications

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Severely-Debilitating or Life-Threatening (SDLT) Indications

- SDLT diseases or conditions are those which cause major irreversible morbidity and/or the likelihood of death is high despite available therapies
- Because of existing guidance that facilitates development of SDLT therapeutics for advanced cancer, today's presentation is focused on non-oncology SDLT conditions for which there is no adequate therapy

JS Prescott, et al. (2017) *Evaluation of Therapeutics for Advanced-Stage Heart Failure and Other Severely-Debilitating or Life-Threatening Diseases.* CPT. 102 (2), 219-227 http://onlinelibrary.wiley.com/doi/10.1002/cpt.730/full

Challenges of Developing Therapeutics for SDLT Indications

- Lack of cross-divisional agreement on development plans for SDLT therapeutics can delay availability of SDLT drugs to patients with high unmet medical needs
  - Results in case-by-case consideration for each program and development delays while seeking regulatory input
    - Existing guidance does not obviate case-by-case requirement
  - SDLT clinical trials may include Ex-US regions/countries, particularly for rare diseases; Delays obtaining agreement from various regions slow availability of potentially beneficial therapies to patients
  - Sponsors default to most conservative approach, obviating ability to accelerate SDLT drug development and availability to patients

Advantages of Cross-Divisional Guidance

- A broadly agreed, cross-divisional guidance would facilitate development of SDLT disease therapeutics with high unmet medical need
  - Enables earlier and continued patient access to potentially beneficial therapies while maintaining standards of safety and efficacy
    - Focus on studies essential to support patient safety in light of unmet medical need
    - Allows rapid advancement to proof-of-concept in patients
    - Expediting an understanding of potential efficacy contributes to benefit versus risk considerations
  - Enables patient and HCP to actively participate in management of patient's condition including trial participation and continued therapy

Development of SDLT Guidance

- Existing guidance provides exemplars
  - ICH S9 Guideline (29Oct2009) and S9 Q&A (12Jun2018) for the Nonclinical Evaluation for Anticancer Pharmaceuticals
  - FDA Guidance for Severely Debilitating or Life-Threatening Hematologic Disorders: Nonclinical Development of Pharmaceuticals (Mar2019)
- Defining scope of guidance is an acknowledged challenge, particularly given cross-therapeutic application
  - Use of defined criteria and list of example indications can provide assurance of appropriate application of guidance to SDLT indications*
- A cross-divisional SDLT guidance will enable consistency across divisions for a “shared therapeutic context” with significant impact for patients with high unmet medical need

*MM Lui et al. (2019) *Evaluation of Therapeutics for SDLT Conditions: Defining Scope to Enable Global Guidance Development.* CPT https://ascpt.onlinelibrary.wiley.com/doi/10.1002/cpt.1673