

Clinical Readiness for IND Submissions

Shelby Elenburg, MD

Division of Clinical Evaluation General Medicine (DCEGM)
OCE | OTP | CBER

SBIA REdI Annual Conference 2023- June 5-9, 2023

Disclosures



- No conflicts of interest
- Nothing to disclose



Learning Objectives

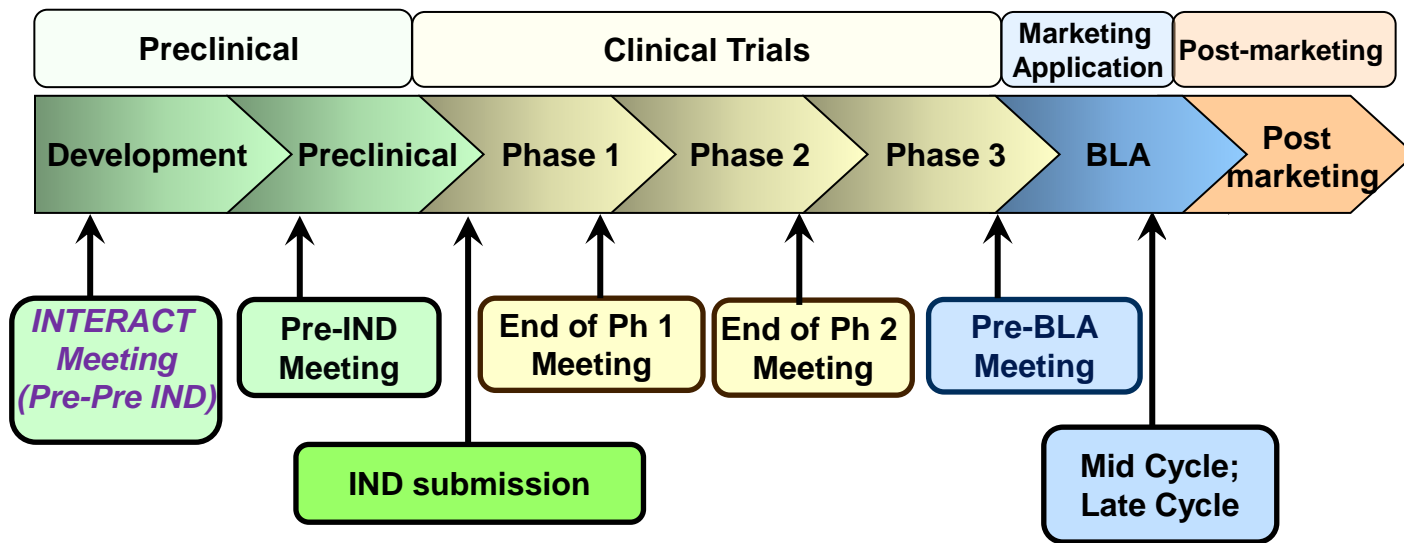
- Understand **regulations and guidances** available to aid in clinical development plans and IND submissions.
- Describe **early interactions** with the FDA and patient communities to assist in clinical development and IND submission readiness.
- Describe considerations for **clinical development plans** for cell and gene therapies for rare diseases.
- Discuss considerations for **early phase, first-in-human trials** for cell and gene therapies.

IND Regulations and Guidances



- Requirements for IND submission: **21 CFR 312.23**
- Guidance for Industry: Content and Format of Investigational New Drug Applications (INDs) for Phase 1 Studies of Drugs, Including Well-Characterized, Therapeutic, Biotechnology-derived Products (November 1995)
- Other cell and gene therapy guidance documents:
<https://www.fda.gov/vaccines-blood-biologics/biologics-guidances/cellular-gene-therapy-guidances>

Opportunities for Interaction During Product Development



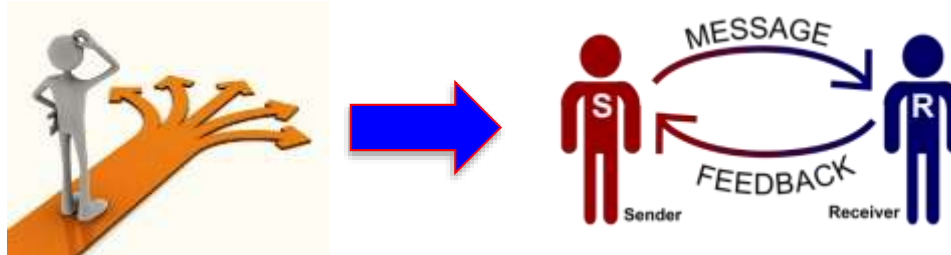
Opportunities for Early Engagement



Early communication with CBER/OTP

INTERACT meeting

Pre-IND meeting



Pre-IND Meeting

- **Product (CMC)**
 - Description of the product manufacturing process and testing conducted (in-process/final product) to demonstrate product identity, quality, and safety
 - Description of product formulation and storage conditions
- **Pharmacology/Toxicology**
 - **A comprehensive summary of all completed preclinical studies** (*in vitro* and *in vivo* studies, animal species/models, study designs, resulting data and interpretation)
 - **Complete protocols for the proposed definitive preclinical safety/toxicology and BD studies** (animal species/models, dose levels, dosing regimen and procedure, study endpoints, sacrifice intervals, etc.)
- **Clinical trial synopsis/protocol**
 - Trial design
 - Objectives
 - Intended patient population
 - Dosing regimen
 - Delivery procedure, including device
 - Monitoring plan
 - Outcome measures

Considerations for Rare Disorders



- **Many rare disorders:**
 - are serious, with no approved treatments (unmet medical need).
 - are heterogeneous, with varied disease severity and time of onset.
 - present with clinical manifestations early in life.

Natural History Studies



- **Natural history studies can potentially provide critical information to guide clinical development:**
 - Product selection
 - Comparator for treatment group
 - Inform study population and endpoint selection
 - If insufficient historical natural history data, additional data may be needed from a prospective natural history study

Patient Engagement

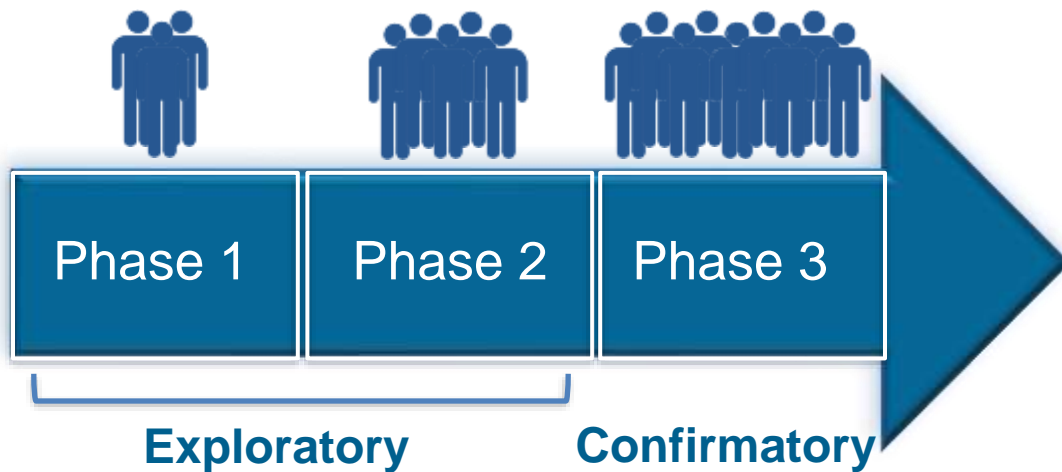
- **Impact of the disease and its treatment**
- **Perspectives about current and potential treatments**
 - Expectations of benefits
 - Tolerance for harms or risks
- **Clinical trial considerations**
 - Burden of participating in clinical studies
 - Willingness to participate in placebo-controlled trials

OTP Patient Engagement Activities



- **Patient-Focused Drug Development Meetings**
- **NORD Patient Listening Sessions**
- Meetings held by **patient advocacy organizations**

Conventional Clinical Development



Regulatory Requirements for BLA Approval



- Approval of drugs and biologics must be based on **substantial evidence of effectiveness** and evidence of safety.
- Evidence of effectiveness should be obtained from **adequate and well-controlled studies**.
- Certain aspects of product development that are feasible for common diseases may not be feasible for rare diseases. FDA regulations provide **flexibility** in applying regulatory standards (21 CFR 314.105).

Early-Phase Trials

- Objectives
 - Primary: safety
 - *Secondary: bioactivity and efficacy*
- Study Population
- Study Design
- Dose Selection
- Treatment Plan
- Monitoring and Follow-Up

Early Phase Trial Objectives



- **Dose exploration**
- **Feasibility assessments**
- **Activity assessments**

Early-Phase Trials

- Objectives
- **Study Population**
 - **Patients with more severe vs less severe condition**
 - **Adults vs children**
- Study Design
- Dose Selection
- Treatment Plan
- Monitoring and Follow-Up

Study Population Considerations



- **Severity of disease:**
 - Risk and potential benefit, interpretability of study results
 - Subjects with severe or advanced disease:
 - May be more willing to accept potential risks
 - Potential for confounding adverse effects of disease
 - Tolerability of study procedures
- **Healthy volunteers typically not appropriate**

Study Population Considerations



- **Lack of other treatment options:**
 - Early-phase studies of CGT products often have significant risks and uncertain potential for benefit.
 - Consider subjects with poor response to available therapies or with no acceptable treatment options.

Study Population Considerations



- **Pediatric subjects:**
 - **21 CFR Part 50, Subpart D:** additional safeguards for children in clinical investigations
 - Not involving greater than minimal risk (21 CFR 50.51)
 - Greater than minimal risk but presenting prospect of direct benefit to individual subjects (21 CFR 50.52)

Study Population Considerations



- **Specific considerations:**
 - Genetic testing
 - Pre-existing antibodies to vector or transgene
 - Could the ability to safely and effectively receive future standard of care therapy be impacted by exposure to the investigational agent?

Early-Phase Trials

- Objectives
- Study Population
- **Study Design**
 - **Early randomized controlled trials, even in first-in-human studies**
 - **Concurrent control with blinding, whenever feasible**
- Dose Selection
- Treatment Plan
- Monitoring and Follow-Up

Early Phase Study Design



- The importance of concurrent controls and blinding in any specific trial depends on multiple factors:
 - study **objectives**
 - extent to which study procedures and outcome assessments are subject to **bias**
- **Objectives of early-phase trials usually focus on safety; efficacy assessments usually exploratory:**
 - Comparison to a concurrent control, blinding may not be necessary

Early Phase Study Design



- **A control group can be particularly useful to:**
 - interpret safety & efficacy data, particularly if pivotal study
 - understand course of diseases where NH is not well characterized
 - understand outcomes for subjects with wide range of disease severity
- **Standard-of-care and no-treatment controls:**
 - Allow evaluation of the risk of the investigational treatment
 - Blinding of the subject and investigator may not be feasible

Early-Phase Trials

- Objectives
- Study Population
- Study Design
- **Dose Selection**
 - **Consideration of preclinical and clinical data**
 - **Extended duration of effect; many single dose**
- Treatment Plan
- Monitoring and Follow-Up

Considerations for Product Dosing



- Adequate and complete investigation of the effective and safe dose range
- Cell therapies are often mixtures of different cell types
- Dose response curves may be flat and non-linear
 - Scientific rationale for dose escalation or de-escalation
 - Pre-specified range of exposure; appropriate dose measurements
- Characterization of safety profile of the feasible doses

Early-Phase Trials

- Objectives
- Study Population
- Study Design
- Dose Selection
- **Treatment Plan**
 - **Number of subjects, cohorts, staggering**
 - **Limited number of study sites**
 - **Operator training**
- Monitoring and Follow-Up

Considerations for Treatment Plan



- Number of subjects (total and in each cohort) to achieve study objectives
- Staggered treatment to limit the number of subjects who might be exposed to an unanticipated safety risk
- Operator training:
 - When individual skill in administering a product may affect safety or effectiveness
 - Specify minimum requirements for training, experience, level of proficiency

Early-Phase Trials

- Objectives
- Study Population
- Study Design
- Dose Selection
- Treatment Plan
- **Monitoring and Follow-Up**
 - **Assessments: safety and efficacy**
 - **Special monitoring for CGT products, duration of follow-up**
 - **Study stopping rules**

Safety

- Routine general safety evaluations, using standard clinical measurements
- Safety assessments to monitor for adverse events that can be anticipated with cellular or gene therapies
- Safety assessments informed by *a priori* safety concerns for the investigational product
- All adverse events are relevant to assessment of safety of the product

Additional Safety Considerations



- Dose-limiting toxicity may not be readily observable early in development
- Careful product administration: staggering, stopping criteria (subject and study)
- Monitoring for: graft-versus-host disease, autoimmune phenomena, cytokine release syndrome, other immune reactions
- Evaluation of product persistence and long-term effects
 - Measurements in appropriate body fluids and tissues, where possible
 - Clinical monitoring and imaging studies for ectopic growth
 - Duration of follow-up specific to product, condition (up to 15 years for gene therapies)

Efficacy



- Feasibility of manufacturing & administration should be addressed early
- Population:
 - Large trial, diverse populations vs. smaller trial, specific patient populations
 - Disease state, timing of treatment, and the immune system state
- Endpoints:
 - Clinical outcomes
 - Biological and/or immunological endpoints
- Inclusion of a concurrent control group in early stages, if feasible

Stopping Rules

- Specify conditions for temporary suspension of enrollment and dosing until a safety assessment can be completed.
- Stopping rules are not necessarily intended to lead to study termination.
- Limit the number of patients put at risk, if early experience uncovers important safety problems.
- Based on the outcomes of the safety assessment, protocol revision may be warranted.

Challenge Question #1



Which of the following is NOT a potential benefit of natural history studies?

- A. Informing study eligibility criteria
- B. Informing study endpoints
- C. Provide healthy volunteers for a treatment study
- D. Providing a comparator group for the treatment population

Challenge Question #2



Which of the following is ideal, if feasible, for first-in-human early phase clinical trials of cell and gene therapy products?

- A. Randomized blinded controlled trial
- B. Healthy volunteers as study population
- C. A large number of study sites
- D. Lack of staggering between study subjects

Summary



- There are unique challenges and opportunities in clinical development of cell and gene therapy products for rare diseases.
- Clinical development for cell and gene therapies must be individualized, particularly when developed for rare diseases.
- Early interactions with FDA are encouraged to ensure the study is designed to meet its objectives.
- Whether or not an early phase study is intended to be a pivotal study has important implications for trial design.

Contact Information

- **Shelby Elenburg, M.D.**
shelby.elenburg@fda.hhs.gov
- **Regulatory Questions:**
OTP Main Line – 240 402 8190
Email: OTPRPMS@fda.hhs.gov and
- **OTP Learn Webinar Series:**
<http://www.fda.gov/BiologicsBloodVaccines/NewsEvents/ucm232821.htm>
- **CBER website:** www.fda.gov/BiologicsBloodVaccines/default.htm
- **Phone:** 1-800-835-4709 or 240-402-8010
- **Consumer Affairs Branch:** ocod@fda.hhs.gov
- **Manufacturers Assistance and Technical Training Branch:** industry.biologics@fda.gov
- **Follow us on Twitter:** <https://www.twitter.com/fdacber>



*FDA Headquarters
Federal Research Center at White Oak
10903 New Hampshire Avenue
Silver Spring, MD 20993-0002*





U.S. FOOD & DRUG
ADMINISTRATION