

Frühere Zulassung von Arzneimitteln

Eine Chance für Patienten (?) (!)

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Medizinische Abteilung
SANOFI
Berlin

“Sprachverwirrung”



<http://www.nuernbergwiki.de/>

- Adaptive Licensing
- Adaptive Pathways
- Flexible Licensing
- Conditional marketing authorization
- Conditional approval
- Managed entry agreements (MEAs)
- Coverage with evidence development (CED)
-

Adaptive Pathways

„Adaptive Pathways“: Mögliche Vorteile

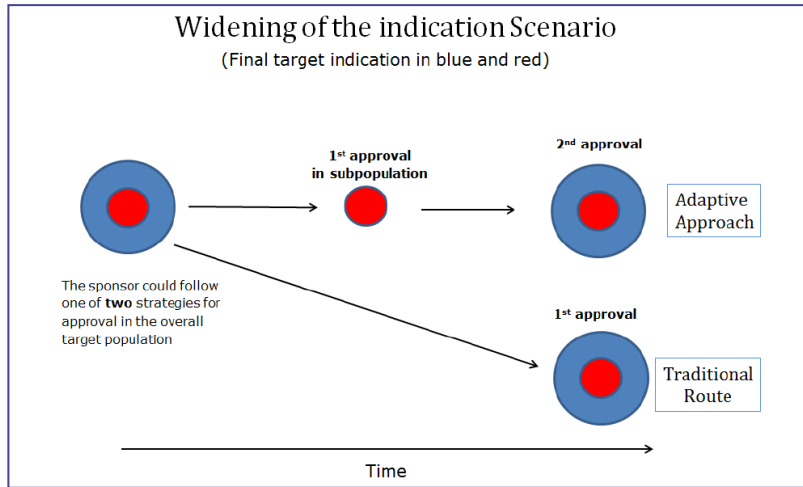
- Patienten können früher mit einer neuen Therapie behandelt werden besonders im Fall von Erkrankungen mit „serious unmet need“
- Die Effizienz der Arzneimittelentwicklung kann verbessert werden
- Kleinere Forschungsunternehmen (SME) haben eine größere Chance
- Es werden sofort die „richtigen“ Patienten behandelt, also diejenigen mit größter Aussicht auf Behandlungserfolg

„Adaptive Pathways“: Mögliche Herausforderungen

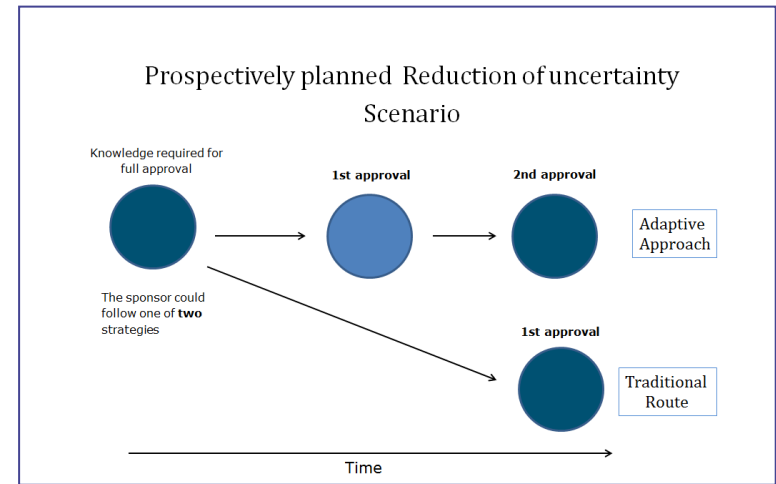
- Wer definiert den „serious unmet need“?
- Wer definiert die „richtigen Patienten“?
- Haben wir die richtigen Studiendesigns für „adaptive pathways“?
- Wie stellt man sicher, dass nach erfolgter Zulassung auch wirklich nur die „richtigen Patienten“ behandelt werden?
- Wie funktioniert die Erstattung von Patientensubpopulationen?
- Wie wird sichergestellt, dass nach früher Zulassung weiter geforscht wird?
- Was tun, wenn sich der (Zusatz-)nutzen in einer Population im klinischen Alltag relativiert?
- Früher Beginn des Patentablaufs bei noch kleiner Population

The sponsor could follow one of two strategies....

Strategy 1



Strategy 2





Adaptive Pathways

Gathering pace: adaptive pathways

www.pmlive.com/pharma_intelligence/gathering_pace_adaptive_pathways_631869

EMA looks at how the model could work in practice and picks first drugs for its pilot project

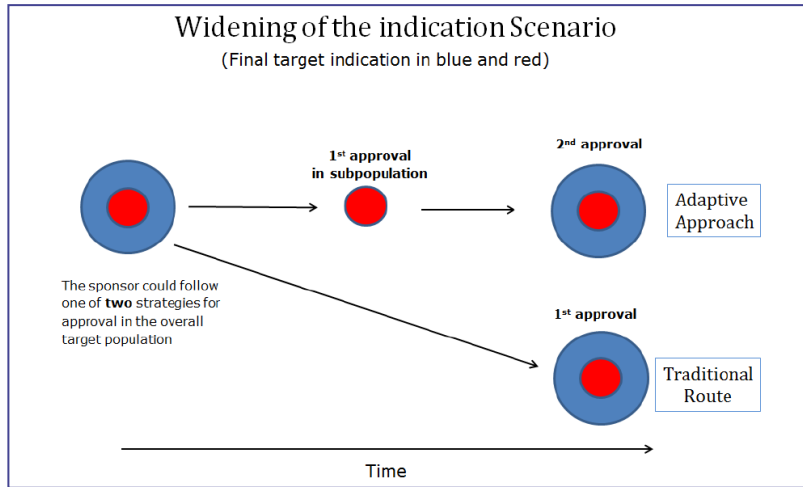


The European Medicines Agency (EMA) has selected six medicines to spearhead its adaptive pathways project, which is trialling a progressive licensing model for new drugs.

- 34 Bewerbungen
- 10 initial ausgewählt
- 6 final ausgewählt
- Ungenaue Beschreibung der Methodik zur Gewinnung von Nachzulassungsdaten
- Endpunkt muss von Zulassung und HTA akzeptiert werden
- „Weg“ von der initialen zur endgültigen Population zu ungenau beschrieben

The sponsor could follow one of two strategies....

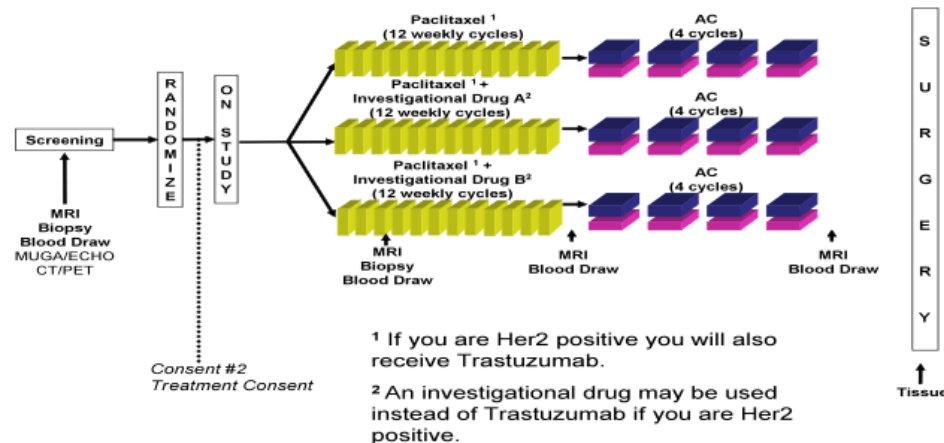
Strategy 1



Design Strategies for Personalized Therapy Trials

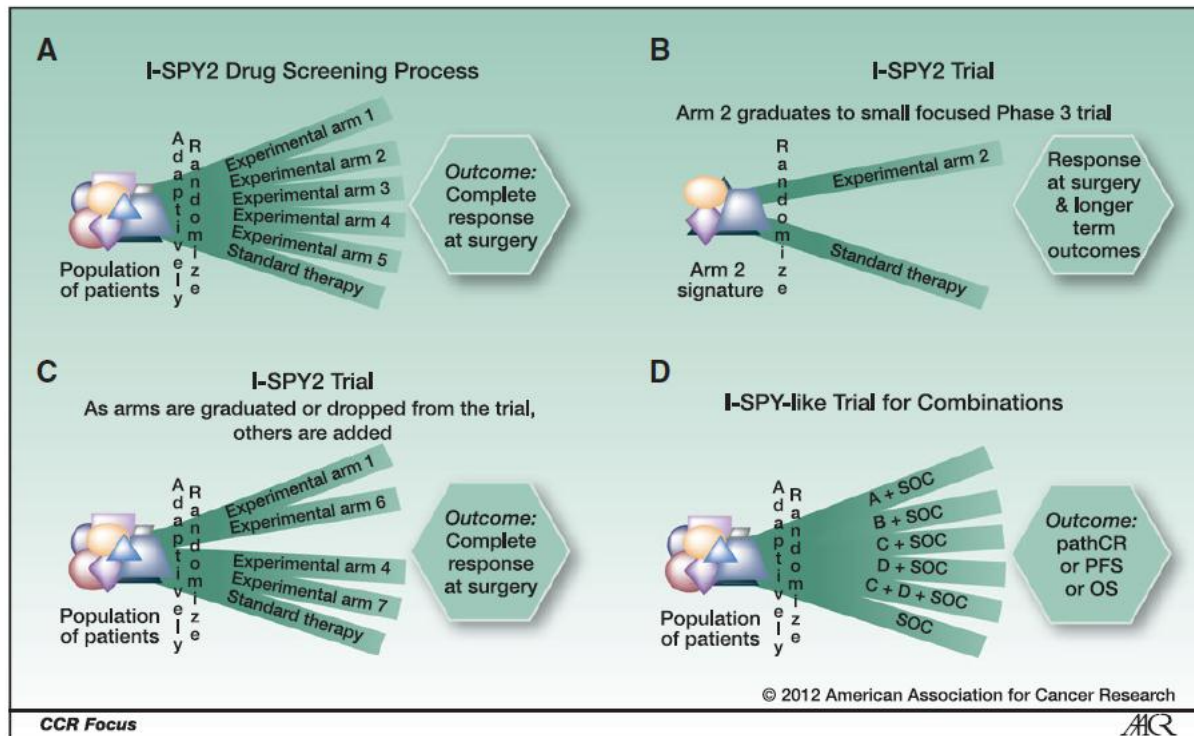
I-SPY 2 (Investigations of Serial Studies to predict Your Therapeutic Response with Imaging and Molecular Analysis 2)

- Neoadjuvant trial, high-risk Stage II/III breast cancer
- Primary endpoint: pathologic complete response (pCR)
- An investigational agent can be graduated from the trial at any time with its biomarker signature
- At least 85% Bayesian predictive probability in a randomized 300 patients phase III trial having the same control arm as I-SPY2 and pCR as endpoint



Design Strategies for Personalized Therapy Trials

I-SPY 2 (Investigations of Serial Studies to predict Your Therapeutic Response with Imaging and Molecular Analysis 2)



Design Strategies for Personalized Therapy Trials

I-SPY 2 (Investigations of Serial Studies to predict Your Therapeutic Response with Imaging and Molecular Analysis 2)

<u>Condition</u>	<u>Intervention</u>	<u>Phase</u>
Breast Neoplasms Breast Cancer Breast Tumors	Drug: Standard Therapy Drug: AMG 386 Drug: AMG 479 (Ganitumab) plus Metformin Drug: MK-2206 with or without Trastuzumab Drug: AMG 386 and Trastuzumab Drug: T-DM1 and Pertuzumab Drug: Pertuzumab and Trastuzumab Drug: Ganetespib Drug: ABT-888 Drug: Neratinib Drug: PLX3397	Phase 2



Neratinib plus standard neoadjuvant therapy for high-risk breast cancer: Efficacy results from the ISPY 2 TRIAL

HER2+
human epidermal growth factor receptor 2, erb-B2, c-erbB2

Results: Neratinib met the predictive probability criterion in HR/ HER2+, “graduated”, and accrual ceased [115 N patients (65 HER2+), 78 concurrently randomized controls (22 HER2+)].

Signature	Estimated pCR Rate (95% probability interval)		Predictive Probability of Success in Phase III	
	Neratinib	Control		
HR-/HER2+	55% (46%-64%)	32% (22%-43%)	94%	78%
HER2+	39% (33%-45%)	23% (15%-30%)	95%	73%
HR+/HER2-	14% (8%-19%)	16% (10%-21%)	39%	12%

Design Strategies for Personalized Therapy Trials

Successful use of Biomarkers and selected population

- Vemurafenib (BRAF Inhibitor)
- Crizotinib (ALK Inhibitor)

Challenges

- Selection of Biomarker is predominantly based on preclinical studies
- Preclinical Models often do not fully recapitulate the clinical setting
- Suggestion of incorrect prediction
- Incorrect „NO GO“ for further development
- No determination of potential benefit in a biomarker negative population

Cetuximab Shows Activity in Colorectal Cancer Patients With Tumors That Do Not Express the Epidermal Growth Factor Receptor (EGRF) by Immunohistochemistry

Table 2. EGFR-Negative Colorectal Cancer Patient Characteristics

Characteristic	Patients		PR Patients	
	No. of Patients	%	No. of Patients	%
Total patients	16	100	4	25
Current age, years				
Median	69		72	
Range	53-82		58-82	
Sex				
Male	11	69	2	50
Female	5	31	2	50
ECOG status				
≤ 2	8	50	2	50
Not documented	8	50	2	50
Cetuximab treatments, No.				
Median	11		15	
Range	1-17		8-17	
Prior treatments, No.				
Median	2		2	
Range	2-5		2-4	
Clinical POD on prior treatment				
Prior irinotecan	15	94	4	100
Prior oxaliplatin	15	94	3	75

Abbreviations: EGFR, epidermal growth factor receptor; PR, partial response; ECOG, Eastern Cooperative Oncology Group; POD, progression of disease.

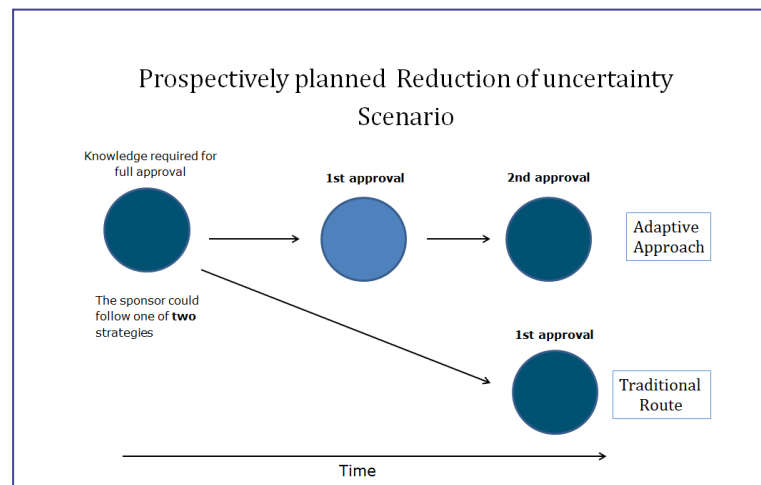
Sixteen chemotherapy-refractory, EGFR-negative colorectal cancer patients who received cetuximab in a nonstudy setting were identified.

Fourteen of these patients received cetuximab plus irinotecan, and two received cetuximab monotherapy.

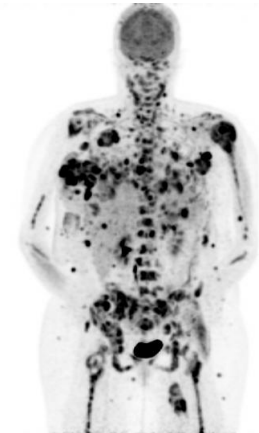
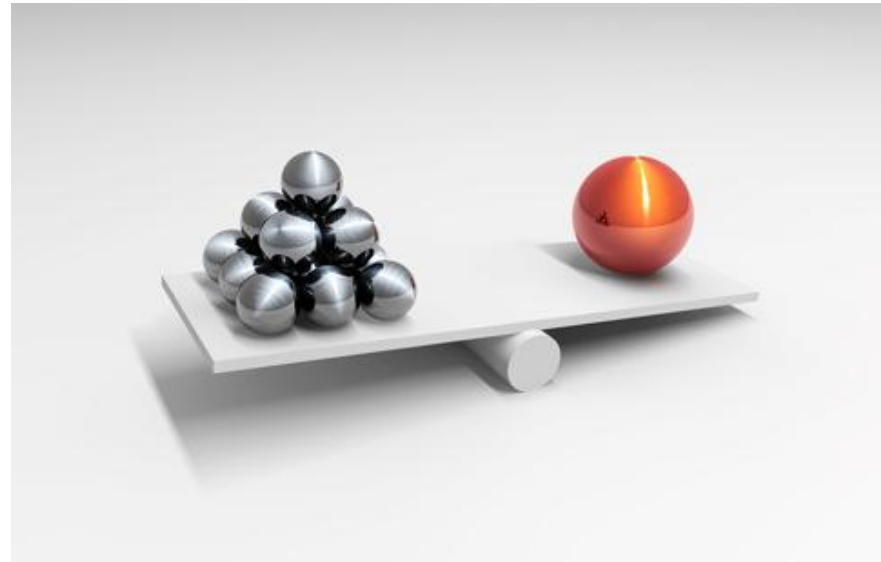
In the 16 patients, four major objective responses were seen (response rate, 25%; 95% CI, 4% to 46%).

The sponsor could follow one of two strategies....

Strategy 2



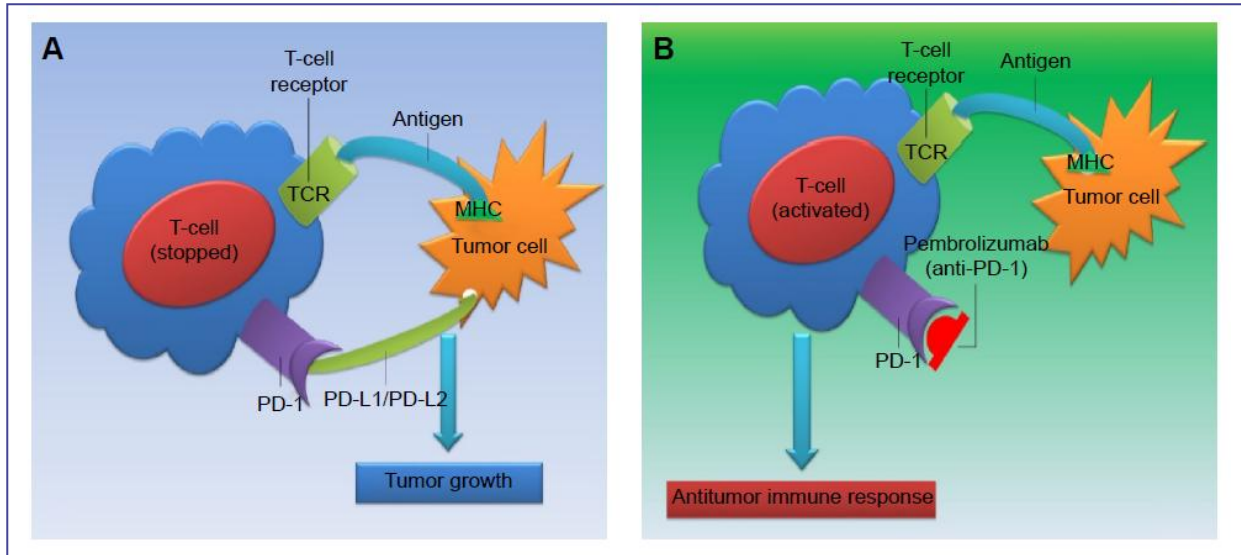
Abwägung: Patient mit malignem Melanom



**Wirksamkeit einer neuen
Behandlung**

**Sicherheit einer neuen
Behandlung**

Pembrolizumab (KEYTRUDA®)



G. Improta et al.
OncoTargets and
Therapy
2015:8 2535-2543



Published on *Merck Newsroom Home* (<http://www.mercknewsroom.com>) on 9/4/14 3:15 pm EDT

Merck Receives Accelerated Approval of KEYTRUDA® (pembrolizumab), the First FDA-Approved Anti-PD-1 Therapy

Release Date:
Thursday, September 4, 2014 3:15 pm EDT

Dateline City:
WHITEHOUSE STATION, N.J.

September 2014



Vorzeitige
Zulassung ohne
Vergleichsstudie



Pembrolizumab (KEYTRUDA®)

21 May 2015
EMA/444458/2015
Committee for Medicinal Products for Human Use (CHMP)

Assessment report

Mai 2015

Keytruda

International non-proprietary name: pembrolizumab

Procedure No. EMEA/H/C/003820/0000



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

**Zulassung bei noch laufenden
Vergleichsstudien**

**PAES Auflage
Post Authorisation Efficacy Studies**

2.5.4. Conclusions on the clinical efficacy

In conclusion, the overall data support the efficacy of pembrolizumab as monotherapy in both patients that are naïve to ipilimumab treatment and patients that have been previously treated with ipilimumab in melanoma patients with advanced disease. The comparative studies P002 and P006 are still ongoing and only interim results have been submitted. Therefore, the CHMP has imposed two PAES to have the final study reports for studies P002 and P006.

Pembrolizumab versus Ipilimumab (P006) (Ipilimumab-naive patients)

Trial stopped after at the second interim analysis for efficacy (overall survival)

Median overall survival was not reached in any study group

6 month progression free survival

Hazard ratio for disease progression 0.58 P < 0.001

Estimated 12-month survival rates

hazard ratio for death for pembrolizumab every 2 weeks 0.63; 95% CI, 0.47 to 0.83; P = 0.0005

hazard ratio for death pembrolizumab every 3 weeks 0.69; 95% CI, 0.52 to 0.90; P = 0.0036

Treatment related adverse events grade 3 to 5

pembrolizumab every 2 weeks 13.3%

pembrolizumab every 3 weeks 10.1%

ipilimumab 19.9%

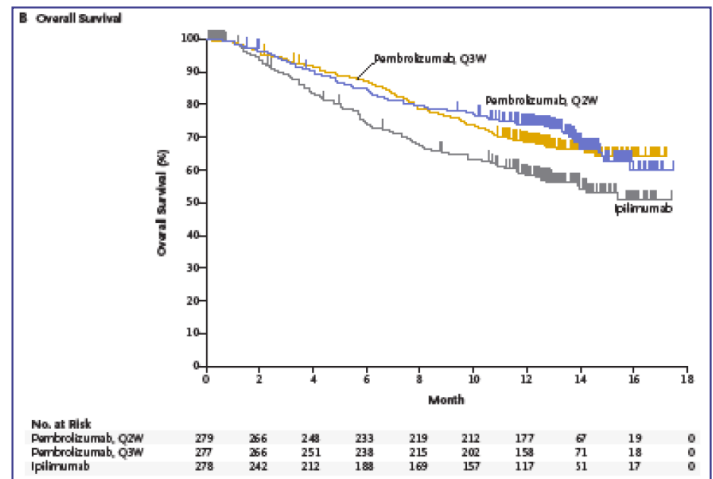
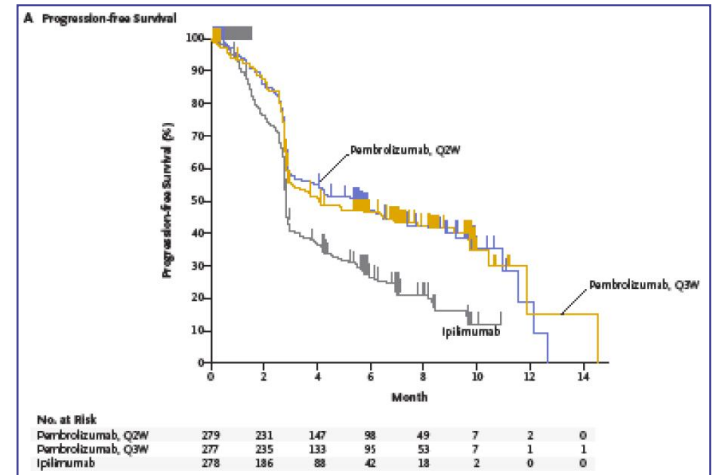


Tabelle 3: Pembrolizumab – Ausmaß und Wahrscheinlichkeit des Zusatznutzens

Frage- stellung	Anwendungsgebiet	Zweckmäßige Vergleichstherapie ^a	Teilpopulation	Ausmaß und Wahrscheinlichkeit des Zusatznutzens
1	vorbehandelte Patienten	Patientenindividuelle Therapie nach Maß- gabe des behandeln- den Arztes unter Be- rücksichtigung des Zulassungsstatus und der jeweiligen Vortherapie.	vorbehandelte Patienten, für die Ipilimumab die geeignete Therapie ist	Hinweis auf einen beträchtlichen Zusatznutzen
			vorbehandelte Patienten, für die Ipilimumab nicht die geeignete Therapie ist	Zusatznutzen nicht belegt
2	nicht vorbehandelte Patienten mit einem BRAF-V600-wt Tumor	Dacarbazin oder Ipilimumab	-	Anhaltspunkt für einen geringen Zusatznutzen
3	nicht vorbehandelte Patienten mit einem BRAF-V600-mut Tumor	Vemurafenib	-	Zusatznutzen nicht belegt

**3 positive Effekte
gleicher
Wahrscheinlichkeit mit
unterschiedlichem
Ausmaß in der Kategorie
schwerwiegende /
schwere
Nebenwirkungen**

**2 positive Effekte
gleicher Wahrscheinlich-
keit und gleichen Aus-
maßes:
Mortalität, gesundheits-
bezogene Lebensqualität**



Bettina Ryll, MD/PhD founded the Melanoma Patient Network Europe after losing her husband to Melanoma and developed a special interest in patient-centric clinical research and drug development. Bettina's current areas of focus are Adaptive Licensing/ MAPPS , innovative sustainable healthcare models and patient-centered risk/benefit assessment tools. Bettina lectures and advises on patient-centric drug development; she is member of ASCO and ISPOR and currently holds the Chair of the ESMO Patient Advocacy Working Group.



WORLD
HEALTH
SUMMIT

„Would you jump out of a plane with a parachute, with a 10% probability of opening?“

***Berlin October
11-13, 2015***



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WORLD
HEALTH
SUMMIT

*Berlin October
11-13, 2015*

„Would you jump out of a plane with a parachute, with a 10% probability of opening?“ ..

and what if this plane is close to hit a cliff?

Adaptive pathways



Arzneimittelsicherheit

Additional safety risk to exceptionally approved drugs in Europe?

Arna H. Arnardottir,¹ Flora M. Haaijer-Ruskamp,¹
Sabine M. J. Straus,^{2,3} Hans-Georg Eichler,⁴ Pieter A. de Graeff^{1,2} &
Peter G. M. Mol^{1,2}

¹Department of Clinical Pharmacology, University Medical Centre Groningen, University of Groningen, Groningen, ²Dutch Medicines Evaluation Board (CBG-MEB), The Hague, ³Medical Informatics, Erasmus Medical Centre, Rotterdam, the Netherlands and ⁴European Medicines Agency, London, UK

Additional safety risk to exceptionally approved drugs in Europe?

- Retrospective cohort study
- 1999-2009
- Frequency and timing of first Direct Healthcare Professional Communication (DHCP)
- 289 new drugs approved
- 46 (16.4%) Exceptional Approval (EC) or Conditional Approval (CA)
- 15% of EC or CA drugs received a DHCP
- 14% of standard approval drugs received a DHCP

Additional safety risk to exceptionally approved drugs in Europe?

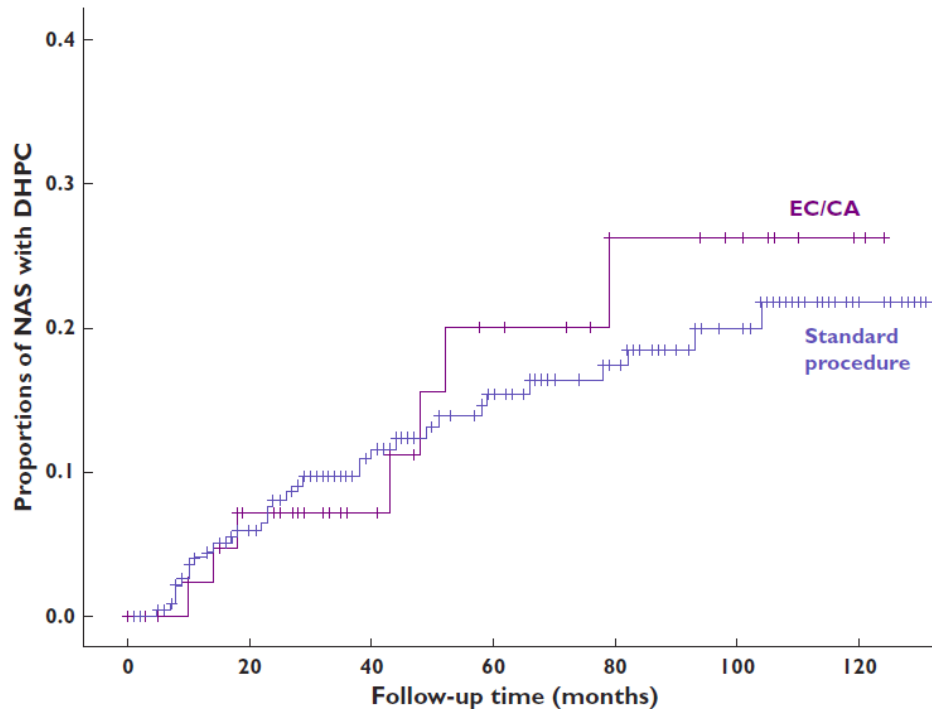


Figure 1

Proportion of new active substances (NAS) that obtained a marketing authorization between 1999 and 2009 under exceptional circumstances/conditional approval (EC/CA) or standard marketing authorizations with or without a Direct Healthcare Provider Communication (DHPC)



European Federation of Pharmaceutical
Industries and Associations

COMMENT

Priorities for improving drug research, development and regulation

*Susan R. Forda, Richard Bergström, Magda Chlebus, Richard Barker and
Peter Høngaard Andersen*

Priorities for improving drug research, development and regulation (1)

- Redefine diseases by their underlying molecular mechanisms
 - Oestrogen receptor (breast cancer)
 - Human epidermal growth factor receptor 2 (Breast cancer)
- Adapt regulatory framework to new science
 - Improving the regulatory framework for companion diagnostics
 - Collaboration to develop better framework (regulators, patients, pharmaceutical and diagnostic industry)
- Develop new trial design and statistical methods
 - Adaptive approaches while maintaining statistical rigor

Priorities for improving drug research, development and regulation (2)

- Establish agreement on benefit risk assessment by regulatory authorities
 - Benefit established only in a small population
 - Risk when widening the population?
 - EMA versus FDA
- Explore new approaches for granting earlier patient access to important new medicines
 - EU conditional marketing authorization (CA)
 - Progressive Marketing authorization (PMA) (e.g. start with a clearly defined groups of patients based on their genotype)
 - Reimbursement for targeted patients!
- Ensure regulatory operational excellence
- Promote global medicines development
 - ICH update

Medicines Adaptive Pathways to Patients (MAPPs)



The screenshot shows a web browser window with the URL efpiamapps.eu. The page features the efpia logo and the title "MAPPs Medicines Adaptive Pathways to Patients". A navigation menu includes "Introduction", "The MAPPs Ecosystem", "Research/Pilots", "Events", "News", "Newsletter", and "EFPIA". A large image shows a scientist in a lab coat and mask. Below the image, a section titled "What are Medicines Adaptive Pathways to Patients (MAPPs)?" provides a definition. To the right, a "Links" section contains a link to "Join the MAPPs Discussion Group on LinkedIn" and a "Videos" section. A "DOWNLOADS" section is also visible at the bottom of the links area.

efpia
European Federation of Pharmaceutical
Industries and Associations

MAPPs Medicines Adaptive Pathways to Patients

Introduction The MAPPs Ecosystem Research/Pilots Events News Newsletter EFPIA

What are Medicines Adaptive Pathways to Patients (MAPPs)?

MAPPs refer to flexible development and access pathways within the current regulatory framework that balance early patient access, public health and societal benefits. MAPPs start with an early authorisation of a product focused on a well-defined and targeted population with a clear safety and efficacy profile

Links

- Join the MAPPs Discussion Group on LinkedIn
- Videos

DOWNLOADS

Medicines Adaptive Pathways to Patients (MAPPs)

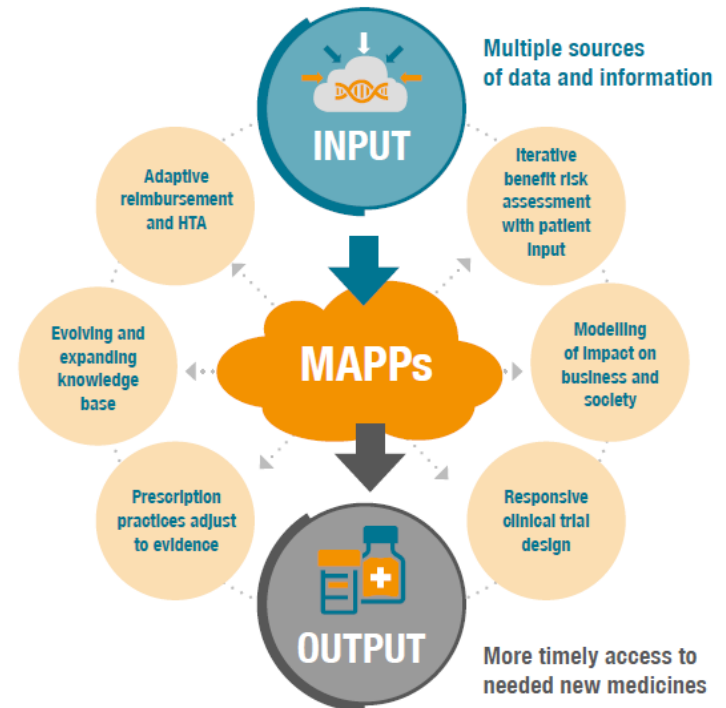
...To Industry, Patients, Payers, Providers, Regulators

MAPPs: What does it mean?

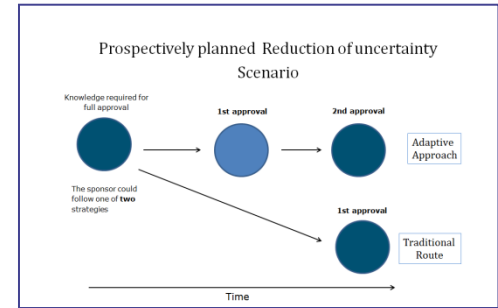
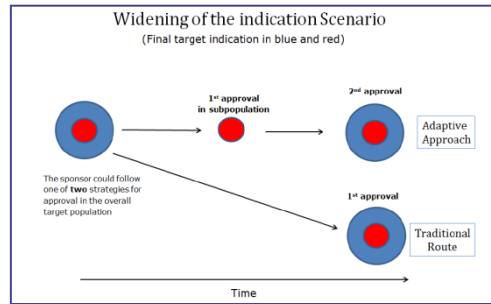
Flexible development and access pathways within the current regulatory framework that balance early patient access, public health and societal benefits.

How is MAPPs different from Current Pathways?

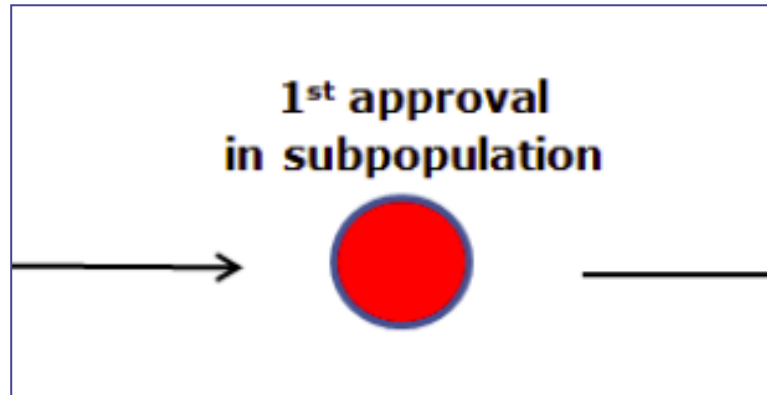
- * An early authorisation of a product in a well-defined and targeted patient population with a clear safety and efficacy profile
- * The target population is adjusted as additional evidence becomes available
- * MAPPs may integrate adaptive clinical trial design, patient centric benefit/risk assessments and continuous re-evaluation as new evidence becomes available
- * MAPPs relate to the entire life cycle of a medicine from development, through licensing to patient access



HEALTH TECHNOLOGY ASSESSMENT



Gedanken des Sponsors..... (eine kleine Auswahl)



- Definition der Subpopulation akzeptiert?
- „unmet need“ für die Subpopulation akzeptiert?
- Diagnose der Subpopulation akzeptiert?
- Subpopulation über „Surrogat Marker“ identifiziert -Okay?
- Subpopulation über „Genetik“ definiert- Okay?
- Erstattungsverhandlung nur für die Subpopulation?
- Erstattungsbetrag für die Subpopulation?
- Größe der Subpopulation?

Marketing Authorization under exceptional circumstances Lomitapide (Lojuxta®)
Oral small molecule inhibitor of microsomal triglyceride transfer protein (MTP)
Treatment of homozygous familial hypercholesterolemia

Article 14(8) of Regulation (EC) No 726/2004

- **Indication is rarely**
- Comprehensive evidence is difficult to be provided
- Subject to specific obligations and conditions
 - the applicant will have to conduct a **prospective observational cohort study (registry)** to **further assess the safety** of lomitapide in the treatment of patients with HoFH and to **further assess** the long-term effectiveness of lomitapide in usual care.
 - the medicinal product in question **may** be supplied on **restricted medical prescription** only
 - the package leaflet and any medical information shall draw the attention of the medical practitioner to the fact that the particulars available concerning the medicinal product in Question are as yet inadequate in certain specified respects.
 - Risk minimization measures
 - annual assessment

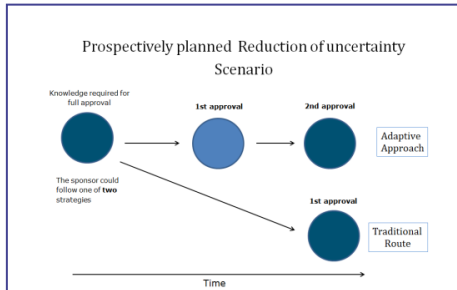
Lomitapid: Nutzenbewertung gemäß §35a SGBV (IQWiG Bericht Nr. 324)

Tabelle 3: Lomitapid – Ausmaß und Wahrscheinlichkeit des Zusatznutzens

Anwendungsgebiet	Zweckmäßige Vergleichstherapie ^a	Ausmaß und Wahrscheinlichkeit des Zusatznutzens
erwachsene Patienten mit HoFH, bei denen medikamentöse und diätische Optionen zur Lipidsenkung ausgeschöpft worden sind und die keine LDL-Apheresebehandlung erhalten	LDL-Apherese (als „ultima ratio“ bei therapierefraktären Verläufen) ggf. mit begleitender medikamentöser lipidsenkender Therapie	Zusatznutzen nicht belegt
erwachsene Patienten mit HoFH, bei denen medikamentöse und diätische Optionen zur Lipidsenkung ausgeschöpft worden sind und die zugleich eine LDL-Apheresebehandlung erhalten		Zusatznutzen nicht belegt
erwachsene Patienten mit HoFH, bei denen medikamentöse und diätische Optionen zur Lipidsenkung nicht ausgeschöpft worden sind	maximal tolerierte medikamentöse und diätische Therapie zur Lipidsenkung	Zusatznutzen nicht belegt

a: Dargestellt ist jeweils die vom G-BA festgelegte zweckmäßige Vergleichstherapie.
G-BA: Gemeinsamer Bundesausschuss; HoFH: homozygote familiäre Hypercholesterinämie; LDL: Low Density Lipoprotein

LDL-C Senkung durch PCSK-9 Inhibition (z.B. Alirocumab)



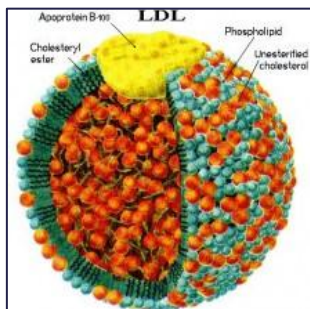
EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

19 December 2013
EMA/CHMP/748108/2013
Committee for Medicinal Products for Human Use (CHMP)

Guideline on clinical investigation of medicinal products in the treatment of lipid disorders

The requirement of clinical studies showing beneficial outcome on morbidity and mortality during registration largely depends on the mechanism of action and the pharmacological class of the medicinal product and the target population. Such studies are not foreseen for the registration of a new HMG-CoA reductase inhibitor. **For other medicinal products acting on LDL-C, at least a detrimental effect on mortality and morbidity should be excluded prior to registration** (see section 7.2). Until clinical trial data are available, it should be specifically mentioned in the Summary of product characteristics (SmPC) that beneficial effects on mortality and morbidity have not been evaluated.

For medicinal products modifying lipid parameters **other than LDL-C, demonstration of a positive clinical outcome in terms of morbidity and mortality is required.**

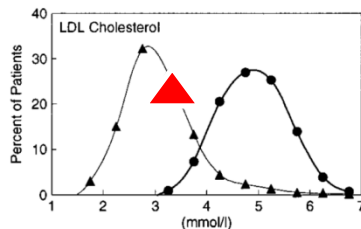


LDL-C Senkung durch PCSK-9 Inhibition (z.B. Alirocumab)



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

4 S Studie



Editorial

Strategies to overcome statin intolerance



Indication for LDL-C lowering after failure of diet and maximum tolerated dose of statin alone or in combination with other lipid lowering therapies or when statins are contraindicated

Pat. SK, m, 48 Jahre, Z.n. VWI Dez. 2014, BMI 24, RR 135/80 mmHg, LDL-C unter 40 mg Atorvastatin 135 mg/dl

Pat. U.H., w, 54 Jahre, Z.n. Apoplex Juni 2013, BMI 28, RR 150/85 mmHg, Juni-August 2013: 40 mg Atorvastatin, Myopathie, September-November 2013 20 mg Fluvastatin Myopathie, keine Interaktionen, jetzt 10 mg Ezetemib, LDL-C 130 mg/dl

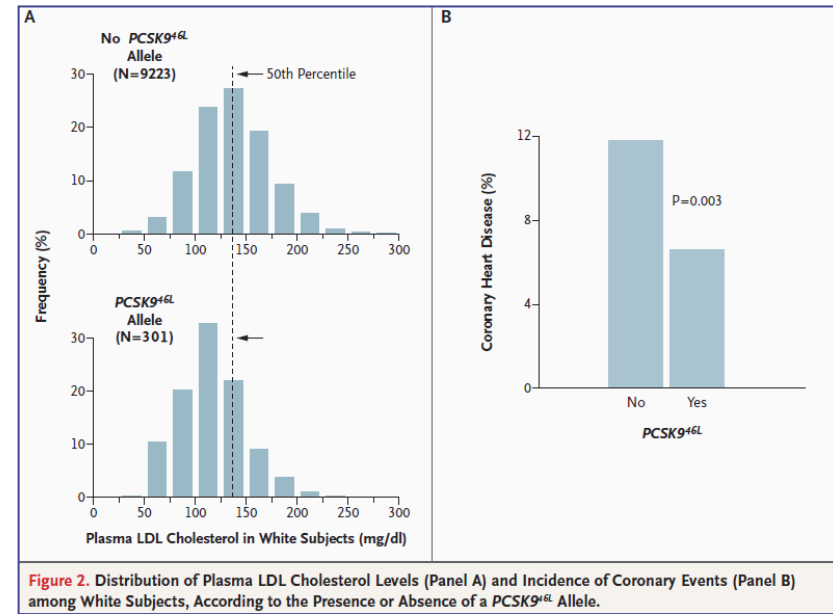
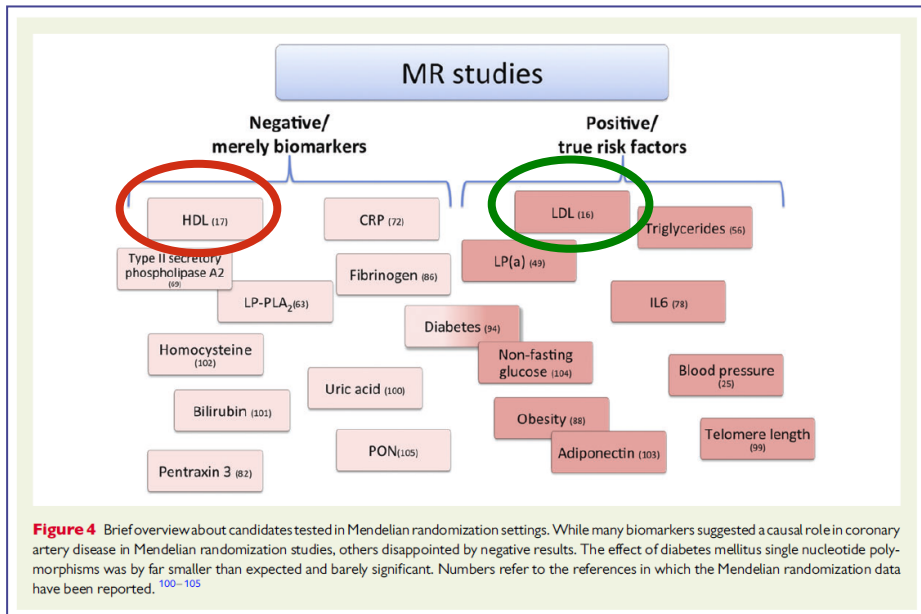
Pat. T.G., w, 35 Jahre, heFH, wöchentliche Apherese seit 3 Jahren, LDL-C vor Apherese unter zusätzlicher maximal verträglicher lipidsenkender Therapie und Diät 162 mg/dl

LDL-C Senkung durch PCSK-9 Inhibition (z.B. Alirocumab)



Argument 1: LDL-C genetisch kausal

Argument 2: PCSK-9 genetisch kausal



Jansen H, Samani NJ, Schunkert H. EHJ 35:1917-1924 (2014)

Cohen JC et al. N Engl J Med 2006;354:1264-72

LDL-C Senkung durch PCSK-9 Inhibition (z.B. Alirocumab)



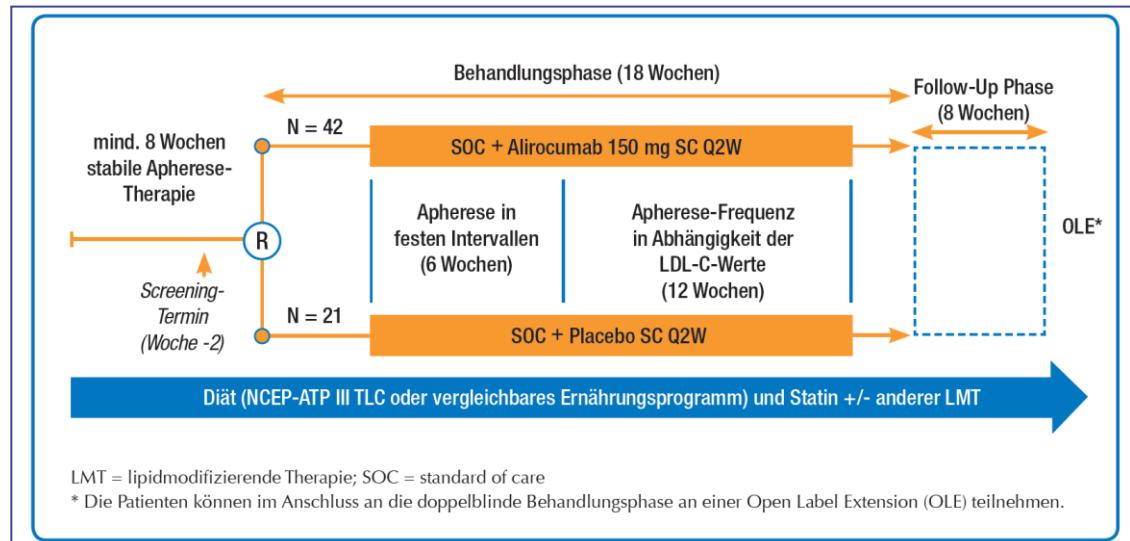
RCT Evidenz
„echte“ Statintoleranz

Original Article

Efficacy and safety of alirocumab vs ezetimibe in statin-intolerant patients, with a statin rechallenge arm: The ODYSSEY ALTERNATIVE randomized trial

Moriarty PM et al. J Clin Lipidol (2015) <http://dx.doi.org/10.1016/j.jacl.2015.08.006>

RCT Evidenz
Lipidapherese

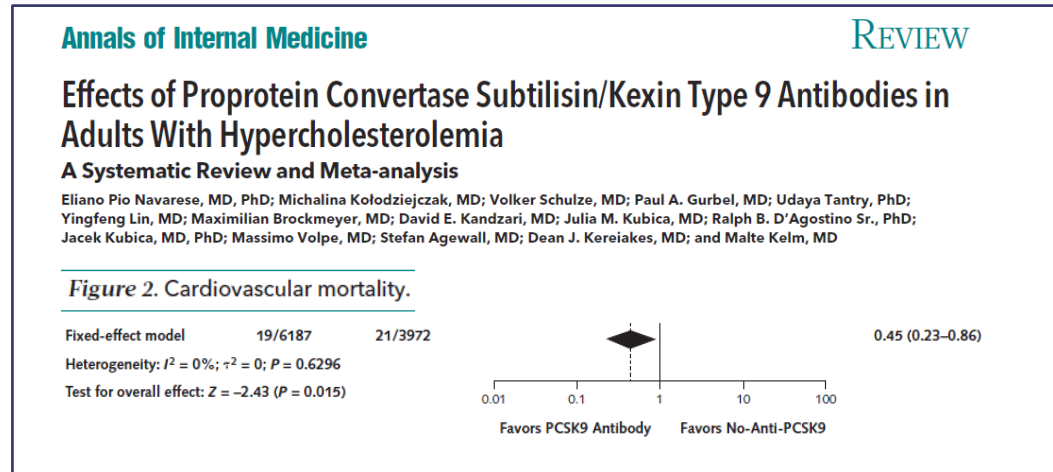


<https://www.clinicaltrials.gov/ct2/show/NCT02326220?term=alirocumab&rank=6>

LDL-C Senkung durch PCSK-9 Inhibition (z.B. Alirocumab)

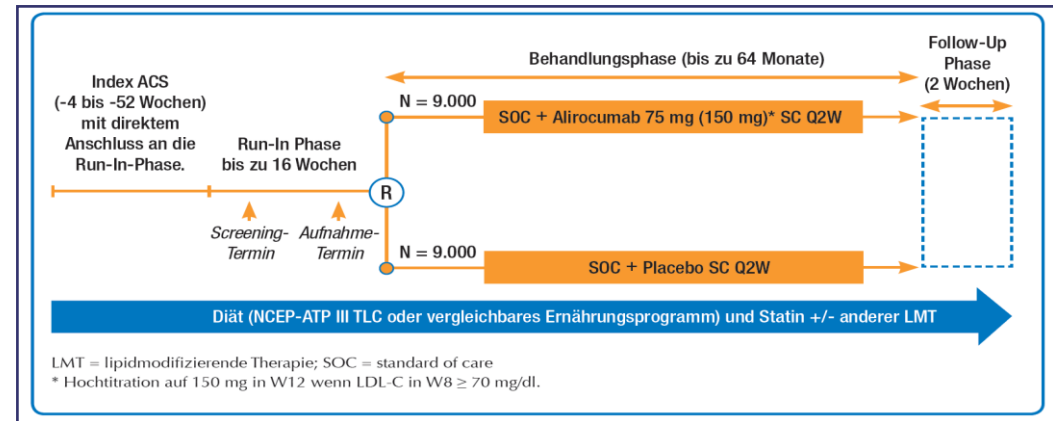


Erste Outcome Daten aus der Phase III



Navarese EP et. al. Ann Int Med 2015 doi:10.7326/M14-2957

Laufende Outcomestudie



<https://www.clinicaltrials.gov/ct2/show/NCT01663402?term=alirocumab&rank=7>



“the safest drug that no one can afford or that arrives too late is of no benefit to a patient”

Zitat eines Patientenvertreters auf dem HTAi policy forum 2014,
Washington, DC