

Case Study on Developing an Inhalational Therapy for Non-Cystic Fibrosis Bronchiectasis (NCFB)

Part 2: Endpoint Considerations

CDR LaRee A. Tracy, MA, PhD
Statistical Reviewer
Division of Biometrics IV, Office of Biostatistics, FDA

FDA Public Workshop
Development of Inhaled Antibacterial Treatments for Cystic Fibrosis and Non-Cystic
Fibrosis Bronchiectasis
June 27, 2018



Trial Design and Endpoint

- Trial Design: Superiority
 - NI trial not an option given lack of established treatments
- A key goal in management is reduction of PEs
 - Major driver of future complications: \uparrow healthcare costs, \downarrow quality of life, significant morbidity
 - Trial Objective: Reduction in exacerbations, reduction in hospitalizations, decreased time on IV antibacterials, etc.
- Chronic use → Need for rigorous evaluation of treatment over a sufficient length of time

Time to First Exacerbation (TFE)



- Relatively parsimonious endpoint and easy to analyze
- Ignores all clinical events occurring after initial PE
- Easily misinterpreted, e.g. a delay in the initial exacerbation followed by more severe exacerbations
- Inconsistent results from prior development programs
 - No evidence TFE predicts long term clinical outcome
 - Less clinically relevant for patients expected to be on therapy for prolonged periods or life-long

Potential Clinical Endpoints for Future Clinical Trials in NCFB



- Total (first and recurrent) pulmonary exacerbations during the trial
- Clinical severity of exacerbations, as measured by:
 - Duration of exacerbation,
 - Duration of hospitalization for exacerbation episode,
 - Days of intravenous antibacterial therapy
- Co-primary endpoint
 - Total exacerbations & severity of exacerbations



Frequency of Exacerbations: Some Considerations

- In some cases, PEs are less frequent, but severe and prolonged
- A limitation is in assessing patient "at risk" time
 - While experiencing an exacerbation patients are not at risk for a subsequent exacerbation
 - This may unduly benefit the treatment arm with patients having longer, more severe exacerbations
 - Investigators may have varying opinions of when an exacerbation has ended and severity

Frequency of Exacerbations: Analytical Considerations



Analysis of total exacerbations as a count

 Strengths: Captures all exacerbations, can adjust other variables in the model, generates an estimate of the mean

 Weaknesses: Ignores correlation among multiple events, fails to account for 'at-risk' time, does not capture duration/time of exacerbations





Recurrent time-to-event approach: Modified Cox PH model-generates est. of the risk of recurrent events

- Andersen and Gill ¹
 - Analyzes time between events (gap time) independently
 - Time-varying covariates to account for correlations and clustering on patient
 - Events assumed to be of the same nature/type and assumes proportionality
 - Application: Focus is on overall effect on the intensity of occurrence of recurrent event
- Prentice, Williams and Peterson ²
 - Analyzes gap times using conditional risk sets (condition based on prior event(s))
 - No baseline hazard assumption
 - Application: When the occurrence of the 1st event increases likelihood of a reoccurrent, i.e. risk of a future PE impacted by prior event

Co-Primary Endpoint



- Incorporates two important clinical endpoints
 - Total PEs over the course of the trial and severity of exacerbations
- Need to power trial on both endpoints
 - \sim prev. 139 per 100,000 ≥ 18 yrs, increases with age 1
 - -~9% annual ↑ in prevalence 2 (in persons ≥65 yrs.)
 - Highly heterogeneous patient population

Other Endpoints



Quality of Life Measures

- AIR-BX1 and AIR-BX2: Adj. mean change from BL in QOL-B-RSS at Week 4
 - AIR-BX1: 0.8 (95% CI: -3.1, 4.7), p=0.68
 - AIR-BX2: 4.6 (95% CI: 1.1, 8.2), p=0.011 (authors concluded no clinical significance)
 - ORBIT and RESPIRE: QoL-B at Week 48: No statistically significant findings
 - RESPIRE trials: SGRQ symptoms domains: Inconsistent results

Pulmonary function

- No differences observed in ORBIT or RESPIRE trials
- Varying results across prior clinical trials
- Measure sensitivity associated with disease severity of trial population

Panel Discussion



- 1. How would you advise Company A to enrich their trials for subjects most likely to demonstrate a treatment benefit?
- 2. What is an appropriate duration for the Phase 3 trials?
- 3. Discuss the importance of the non-TFE endpoints.
- 4. Is a co-primary endpoint of total exacerbations and severity of exacerbations clinically meaningful?
- 5. What other endpoints should be considered?

