



Use of artificial intelligence within drug development programs

Promoting Effective Drug Development Programs:
Opportunities and Priorities for FDA's Office of New Drugs

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Unlearn.AI: a science-based company creating computational innovations to benefit patients and improve healthcare



Jon Walsh Ph.D. Charles Fisher Ph.D. Aaron Smith Ph.D.

Company overview:

Founded in 2017

Started by 3 ML scientists

Background in Pharma R&D

Focused on unsupervised learning

9 employees

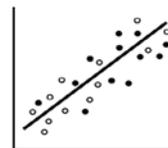
San Francisco, CA



Curated clinical trial data.

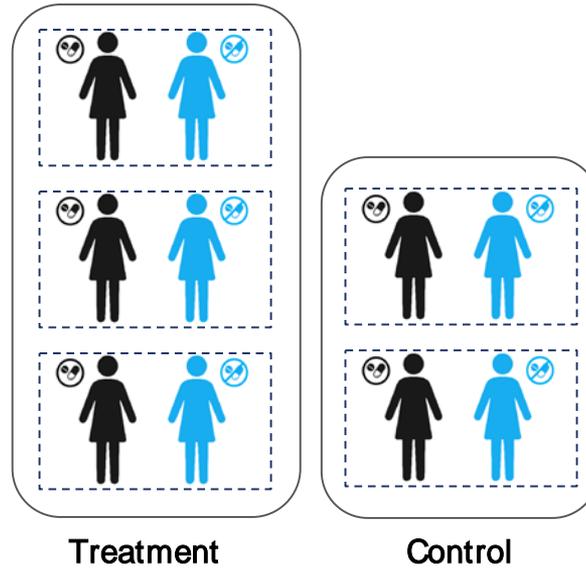
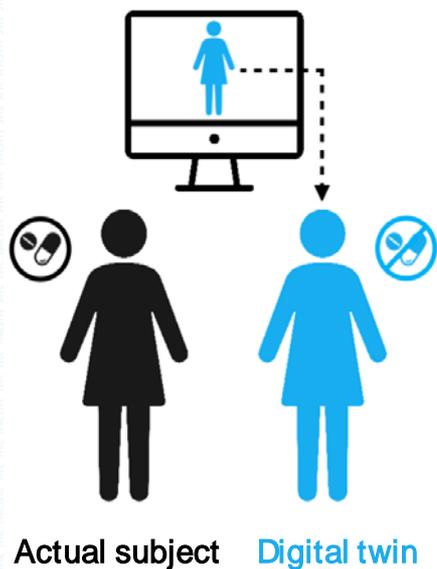


Sophisticated machine learning.



Rigorous statistical analysis.

Unlearn uses ML to create **digital twins** that allow us to ask “what would have happened to a specific subject in a clinical trial if he or she had received a placebo?”



Example of synthetic AD patient data

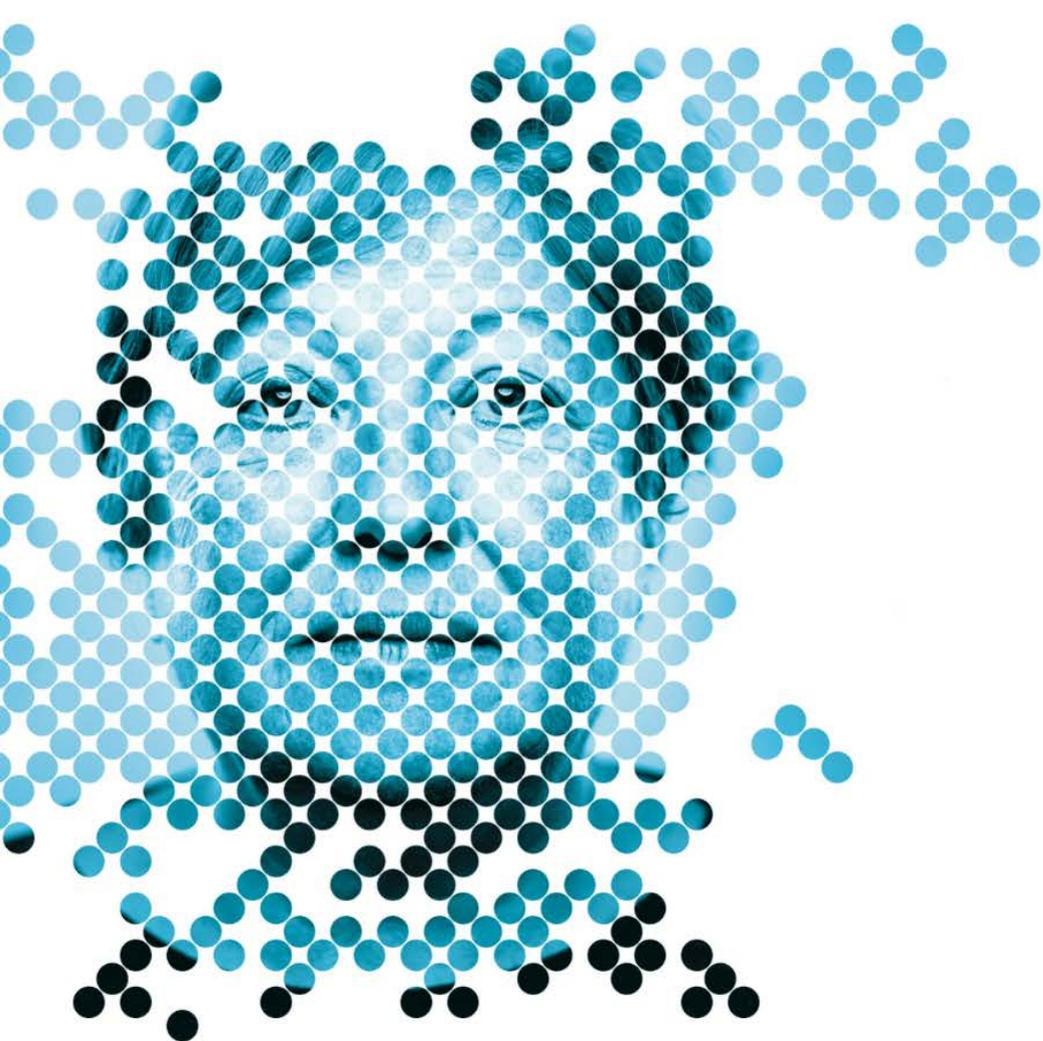
		73		Sex:		Female									
Age (years):		White		Region:		North America									
Race:		167		ApoE ε4 Count:		1									
Height (cm):		AD		Past Cardiovascular event:		No									
Diagnosis:		Baseline		3		6									
		9		12		15									
		18		21		24									
		27		30		33									
		36													
ADAS	ADAS Commands	1	3	3	1	3	4	2	3	3	4	4	3	2	
	ADAS Comprehension	1	2	2	1	1	2	0	1	2	3	2	4	2	
	ADAS Construction	2	3	3	1	0	1	1	2	2	1	1	1	1	
	ADAS Delayed Word Recall	10	10	10	10	10	10	10	10	10	10	10	10	10	
	ADAS Ideational	1	2	2	1	2	4	3	3	3	3	2	3	3	
	ADAS Naming	1	2	2	4	3	2	2	3	3	3	2	2	2	
	ADAS Orientation	5	5	5	6	8	7	6	6	8	8	7	7	8	
	ADAS Remember Instructions	4	4	5	5	4	5	5	4	5	5	5	5	5	
	ADAS Spoken Language	2	2	1	0	0	0	1	1	2	3	4	3	5	
	ADAS Word Finding	1	2	2	0	1	0	1	0	1	3	3	3	4	
MMSE	MMSE Attention Calculation	1	2	3	0	0	0	0	0	1	0	0	1	1	
	MMSE Language	7	4	5	7	7	6	4	6	4	6	4	5	6	
	MMSE Orientation	6	6	2	2	4	1	3	0	3	3	0	3	2	
	MMSE Recall	0	0	0	0	0	0	0	0	1	0	0	1	0	
	MMSE Registration	3	3	3	2	1	2	2	3	3	2	3	2	3	
	MMSE Total	17	15	13	11	12	9	9	9	12	11	7	12	12	
	Clinical	Weight (kg)	56	57	60	55	61	67	68	65	64	68	66	67	71
		Systolic Blood Pressure (mmHg)	156	132	131	156	166	130	117	113	128	109	129	138	124
		Diastolic Blood Pressure (mmHg)	67	85	82	79	88	60	66	61	65	60	63	77	75
		Heart Rate (bpm)	78	71	72	72	59	59	59	72	61	66	66	70	87
Biomarkers	Alanine Aminotransferase (kat/l)	0.18	0.31	0.18	0.15	0.26	0.29	0.32	0.30	0.20	0.13	0.15	0.19	0.27	
	Alkaline Phosphatase (kat/l)	1.78	1.16	1.63	1.12	1.30	1.43	1.00	1.93	1.18	1.02	2.43	1.61	0.99	
	Aspartate Aminotransferase (kat/l)	0.32	0.22	0.34	0.30	0.31	0.25	0.27	0.26	0.25	0.20	0.24	0.24	0.30	
	Cholesterol (mmol/l)	7.13	5.52	5.72	5.48	4.99	5.22	5.42	5.10	5.61	6.61	5.27	5.49	6.07	
	Creatine Kinase (mg/dl)	0.48	1.35	0.45	0.28	0.89	0.35	0.53	0.62	0.86	0.49	0.42	0.28	0.28	
	Creatinine (mg/dl)	1.30	1.27	1.27	1.02	1.21	1.40	1.30	1.10	1.06	0.99	1.16	0.86	0.93	
	Gamma Glutamyl Transferase (kat/l)	1.39	1.90	2.45	3.18	2.45	3.14	2.15	1.45	1.97	1.89	1.56	1.56	1.56	
	Hematocrit (counts)	0.39	0.47	0.44	0.49	0.43	0.40	0.39	0.37	0.37	0.40	0.40	0.44	0.41	
	Hemoglobin (g/dl)	13.87	14.16	13.44	13.75	13.26	13.10	12.14	12.73	12.40	13.96	13.34	12.05	15.24	
	Hemoglobin A1C (%)	5.54	5.82	5.78	6.12	6.20	6.82	7.45	6.61	6.59	6.63	6.61	5.65	5.61	
	Indirect Bilirubin (mg/dl)	0.29	0.39	0.33	0.61	0.28	0.33	0.37	0.68	0.43	0.68	0.42	0.63	0.37	
	Potassium (mmol/l)	4.38	3.78	4.69	4.56	4.71	4.61	4.76	4.49	4.13	4.36	3.80	4.70	3.92	
	Sodium (mmol/l)	1.42	1.41	1.43	1.42	1.44	1.37	1.38	1.39	1.43	1.38	1.40	1.46	1.38	
	Triglycerides (g/l)	2.48	1.94	1.64	3.56	1.64	1.20	1.51	1.37	0.61	2.26	1.60	3.31	1.87	

We recommend that CDER develop a framework describing how AI tools may be used within drug development programs

For example, CDER could

- clarify how some AI applications for drug development could be qualified within FDA's Drug Development Tool Qualification Programs
- promote new pathways in which sponsors and other stakeholders may obtain feedback from FDA about specific uses of AI-based tools
- develop demonstration projects to facilitate the use of AI tools in drug development to support regulatory decision-making

The above concrete actions would alleviate regulatory uncertainty and would open the door to innovative approaches that will make drug development more efficient and help deliver new treatments to patients who need them as quickly as possible.



It's about **giving data life** through machine learning that transforms a trial's statistical power.

It's about time.

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