

## FDA Pulmonary-Allergy Drugs Advisory Committee Meeting FDA Opening Remarks

NDA 215010: Gefapixant for the Treatment of Refractory or Unexplained Chronic Cough in Adults

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Office of Immunology and Inflammation / Office of New Drugs

**Center for Drug Evaluation and Research** 

**U.S. Food and Drug Administration** 

**November 17, 2023** 

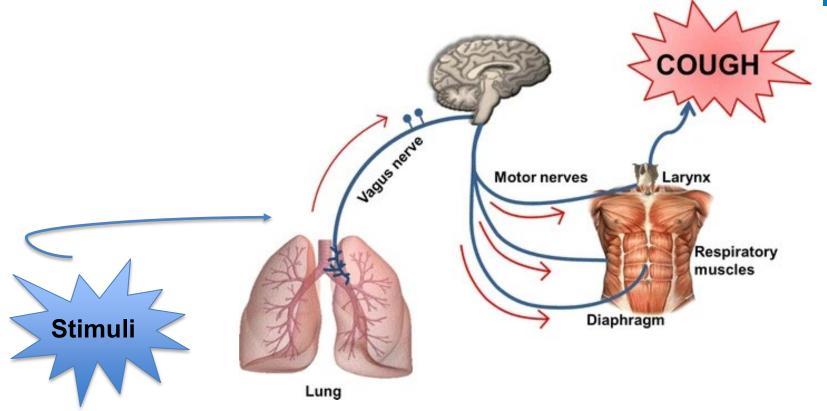
## **Gefapixant**



- Mechanism of action: oral P2X3 antagonist
- New molecular entity (NME), first in class, not approved in US
- Proposed indication
  - Treatment of adults with refractory or unexplained chronic cough
- Proposed dosage
  - 45 mg oral tablet twice daily



**Cough Reflex Arc** 





# FDA

## **Epidemiology of Chronic Cough**

- Defined by chronicity > 8 weeks
- Common, 5% US population
- Adults
  - Average age 55 years
  - Onset most common in 6<sup>th</sup> decade of life
- Females > Males
- Natural history not well-characterized

#### Refractory Chronic Cough (RCC)

- Underlying etiology identified (asthma, eosinophilic bronchitis, gastroesophageal reflux, postnasal drip, medications, etc.)
- Symptoms persist despite treatment



#### **Unexplained Chronic Cough (UCC)**

- No underlying etiology identified
- No response to empiric treatment



#### **Chronic Cough (CC)**

**Current Treatment Options** 

- Off-label therapy e.g., opioids, gabapentin, pregabalin, antitussives
- Speech language therapy
- No approved therapies → unmet need





### **Gefapixant Clinical Development Program**

				No. of Sites and
		Number Treated, Regimen	Primary Endpoint	Countries
				.== ::
			= : :	175 sites in 20
or UCC	PC, PG	• Gef 45 mg: 439	at Week 24	countries
		• Gef 15 mg: 440		
		• Placebo: 435		
Adults with RCC	52-week, R, DB,	Total treated: 730	24-hour cough frequency	156 sites in 17
or UCC	PC, PG	• Gef 45 mg: 243	at Week 12	countries
		• Gef 15 mg: 244		
		• Placebo: 243		
entary Efficacy and Sa	afety Trials			
Adult females	12-week, R, DB,	Total treated: 375	Daily episodes of cough-	90 sites in 12
with stress	PC, PG	• Gef 45 mg: 185	induced stress urinary	countries
urinary		• Placebo: 190	incontinence at Week 12	
incontinence and				
RCC or UCC				
Adults with	12-week, R, DB,	Total treated: 415	LCQ total score at Week 12	91 sites in 12
recent-onset (<12	PC, PG	• Gef 45 mg: 206		countries
months) RCC or	,	• Placebo: 209		
•				
Adults with RCC or	52-week R, DB,	Total treated: 160	24-hour cough frequency at	20 sites in China
UCC	PC. PG	•Gef 45 mg: 66	Week 24	
	, -	· ·		
		_		
	Adults with RCC or UCC  Adults with RCC or UCC  Adult females with stress urinary incontinence and RCC or UCC  Adults with recent-onset (<12 months) RCC or UCC tary Safety Trial  Adults with RCC or Adults with RCC or UCC	Adults with RCC 52-week, R, DB, or UCC PC, PG  Adults with RCC 52-week, R, DB, or UCC PC, PG  Adults with RCC 52-week, R, DB, or UCC PC, PG  Adults with RCC 52-week, R, DB, PC, PG  Adult females 12-week, R, DB, with stress PC, PG  urinary incontinence and RCC or UCC  Adults with 12-week, R, DB, recent-onset (<12 PC, PG  months) RCC or UCC  tary Safety Trial  Adults with RCC or 52-week R, DB,	Adults with RCC 52-week, R, DB, or UCC PC, PG Gef 45 mg: 439 Gef 15 mg: 440 Placebo: 435  Adults with RCC 52-week, R, DB, or UCC PC, PG Gef 45 mg: 243 Or UCC PC, PG Gef 45 mg: 243 Gef 15 mg: 244 Placebo: 243  Entary Efficacy and Safety Trials  Adult females 12-week, R, DB, with stress PC, PG Gef 45 mg: 185 Urinary Gef 45 mg: 206 UCC Adults with 12-week, R, DB, Total treated: 415 Frecent-onset (<12 PC, PG Gef 45 mg: 206 Frec	Adults with RCC 52-week, R, DB, or UCC PC, PG Gef 45 mg: 439 at Week 24  Adults with RCC 52-week, R, DB, or UCC PC, PG Gef 45 mg: 439 at Week 24  Adults with RCC 52-week, R, DB, or UCC PC, PG Gef 45 mg: 243 at Week 12  Adults with RCC 52-week, R, DB, or UCC PC, PG Gef 45 mg: 243 at Week 12  Adults with RCC FC, PG Gef 45 mg: 243 at Week 12  Adult females 12-week, R, DB, or Ucc FC, PG Gef 45 mg: 185 induced stress urinary incontinence and RCC or UCC FC FC, PG Gef 45 mg: 185 induced stress urinary incontinence and RCC or UCC FC FC, PG Gef 45 mg: 206 FC, PG Gef 45 mg: 206  Adults with 12-week, R, DB, FC, PG Gef 45 mg: 206 FC, PG Gef 45 mg: 206  Adults with RCC or UCC FC Gef 45 mg: 206 FC, PG Gef 45 mg: 206  Adults with RCC or UCC FC Gef 45 mg: 206 FC, PG Gef 45 mg: 207  Adults with RCC or UCC FC Gef 45 mg: 206 FC, PG Gef 45 mg: 207  Adults with RCC or UCC FC, PG Gef 45 mg: 206 FC, PG Gef 45 mg: 206 FC, PG Gef 45 mg: 207  Adults with RCC or UCC FC, PC Gef 45 mg: 206 FC, PC, PC Gef 45 mg: 206 FC, PC, PC Gef 45 mg: 206 FC, PC, PC, PC, PC, PC, PC, PC, PC, PC, P

Source: Clinical reviewer. All treatment doses were given twice daily.



#### **Gefapixant Clinical Development Program**

					No. of Sites and
Trial Identity	<b>Trial Population</b>	Trial Design	Number Treated, Regimen	Primary Endpoint	Countries
Phase 3 Pivotal Effic	cacy and Safety Trial	s			
P030	Adults with RCC	52-week, R, DB,	Total treated: 1314	24-hour cough frequency	175 sites in 20
	or UCC	PC, PG	• Gef 45 mg: 439	at Week 24	countries
			• Gef 15 mg: 440		
			• Placebo: 435		
P027	Adults with RCC	52-week, R, DB,	Total treated: 730	24-hour cough frequency	156 sites in 17
	or UCC	PC, PG	• Gef 45 mg: 243	at Week 12	countries
			• Gef 15 mg: 244		
			• Placebo: 243		
Phase 3b Suppleme	ntary Efficacy and Sa	afety Trials			
P042	Adult females	12-week, R, DB,	Total treated: 375	Daily episodes of cough-	90 sites in 12
	with stress	PC, PG	• Gef 45 mg: 185	induced stress urinary	countries
	urinary		• Placebo: 190	incontinence at Week 12	
	incontinence and				
	RCC or UCC				
P043	Adults with	12-week, R, DB,	Total treated: 415	LCQ total score at Week 12	91 sites in 12
	recent-onset (<12	PC, PG	• Gef 45 mg: 206		countries
	months) RCC or		• Placebo: 209		
	UCC				
Phase 3 Supplement	tary Safety Trial				
P030 China specific	Adults with RCC or	52-week R, DB,	Total treated: 160	24-hour cough frequency at	20 sites in China
extension .	UCC	PC, PG	•Gef 45 mg: 66	Week 24	
		•	•Gef 15 mg: 27		
			• Placebo: 67		

Source: Clinical reviewer. All treatment doses were given twice daily.





	Trial P030 (Week 24)		Trial P027 (Week 12)		
Variable		Gefapixant		Gefapixant	
24-hour cough frequency (coughs/hour)	Placebo	45 mg	Placebo	45 mg	
N	419	409	222	217	
Geometric mean <sup>1</sup> at baseline	20.4	19.4	23.6	18.9	
Geometric mean <sup>1</sup> at Week 24 or 12	8.7	7.1	10.6	7.4	
Primary endpoint/analysis/p-value					
Relative reduction (%) in geometric mean ratio		-14.6		-17.0	
(95% CI) <sup>2</sup>		(-26.0, -1.5)		(-31.5 <i>,</i> 0.6)	
p-value <sup>2</sup>		0.030		0.057	
Median <sup>3</sup> cough frequency at baseline	21.3	19.9	26.1	20.9	
(min, max)	(0.7, 184)	(0.2, 230)	(0.3, 1054)	(0.2, 399)	
Median <sup>3</sup> cough frequency at Week 24 or 12	11.4	7.7	11.6	8.7	
Median <sup>3</sup> change from baseline in cough	-8.7	-9.8	-8.9	-10.5	
frequency at Week 24 or 12					

Source: FDA Briefing Document, Table 1. N: number of subjects who had baseline and postbaseline values; CI: confidence interval; MMRM: mixed model repeated measures.

<sup>&</sup>lt;sup>1</sup> Geometric means were used because these frequency data were log-transformed. <sup>2</sup> Based on MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit. The estimated relative reduction (relative to placebo) is calculated by 100 (e<sup>DIFF</sup>-1). DIFF is the treatment difference in change from baseline at Week 12 or 24 based on the log-transformed data. <sup>3</sup> Median values were from post hoc analyses on all available observations at specific visits.

## **P030 and P027 Primary Endpoint Results**



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### P030/P027 Multiplicity-Controlled Secondary Endpoint Results

Variable	Trial PC	30 (Week 24)	Trial P027 (Week 12)	
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
Awake cough frequency				
N a	419	409	222	217
Geometric mean at baseline	26.9	25.2	31.4	25.0
Geometric mean at Week 24 or 12	11.3	9.0	13.8	9.6
Geometric mean ratio (95% CI) bc	0.43 (0.38, 0.47)	0.36 (0.32, 0.40)	0.46 (0.40, 0.53)	0.39 (0.33, 0.45)
Relative reduction (%) in geometric mean ratio (95% CI) <sup>c</sup>		-15.5 (-27.0, -2.3)		-16.3 (-31.2, 1.9)
p-value		0.023		0.076
≥1.3-point increase from baseline in LCQ total score				
n <sup>d</sup> /N <sup>d</sup> (%)	245/355 (69)	262/342 (77)		
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.4 (1.0, 2.0)		
p-value <sup>e</sup>		0.040		
Responder/N (%) <sup>f</sup>	245/415 (59)	262/419 (63)		
Estimated difference (%) (95% CI)g		3.3 (-3.3, 9.9)		
≥30% reduction from baseline in 24-hr cough frequency				
n <sup>d</sup> /N <sup>d</sup> (%)	245/368 (67)	248/347 (72)	135/205 (66)	133/194 (69)
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.2 (0.9, 1.7)		1.2 (0.8, 1.8)
p-value <sup>e</sup>		0.188		0.435
Responder/N (%) <sup>f</sup>	245/432 (57)	248/434 (57)	135/232 (58)	133/237 (56)
Estimated difference (%) (95% CI)g		0.4 (-6.1, 7.0)		-2.2 (-11.2, 6.8)

a N=Number of subjects who had baseline and postbaseline assessments. b Based on subjects with nonmissing values at baseline and Week 24. s Based on the MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit. The estimated relative reduction (relative to placebo) is calculated by 100 (e<sup>DiFF</sup> -1). DIFF is the treatment difference in change from baseline at Week 24 based on the log-transformed data. N=Number of subjects with available data at Week 24; n=number of responders at Week 24. s Based on the logistic regression model with terms of treatment, visit, treatment-by-visit interaction, gender, region, baseline, and baseline-by-visit interaction among subjects who had baseline and post baseline values. N=number of subjects who had baseline values. Subjects with nonmissing baseline data but missing Week 24 data are imputed as nonresponders. Based on the Mietinnen and Nurminen method.





Only multiplicity controlled endpoint

Variable	Gefapixant n/Na	Placebo n/Nª	Percent Responders (%)	Odds Ratio v. Place	bo	
Ot al Book	n/Nª	n/Nª	(Gefapixant v. Placebo)	(95% CI)		1
Study P030						
≥1.3 increase in	262/342	245/355	76.6 v 69.0	1.4 (1.0, 2.0)	P= 0.040	· -
LCQ total score				, , ,		
≥1.3 reduction in	253/331	237/346	76.4 v 68.5	1.5 (1.1, 2.1)	_	<u> </u>
mean weekly CSD total score	200,001	2077010	10.11 00.0	1.0 (1.1, 2.1)		
≥2.7 reduction in	186/331	154/346	56.2 v 44.5	1.8 (1.3, 2.4)		<u> </u>
mean weekly CSD total score	100/001	10-70-10	00.2 7 44.0	1.0 (1.0, 2.4)		
≥30 mm reduction in	178/331	150/346	53.8 v 43.4	1.7 (1.2, 2.2)		¦
Cough Severity VAS score	170/331	150/540	55.6 V 45.4		I	-
					Comparisons	
Study P027					are not multiplicity-	
≥1.3 increase in	101/101	100/100	00.4.00.0		controlled _	
LCQ total score	134/194	123/196	69.1 v 62.8	1.3 (0.9, 2.0)	controlled	
≥1.3 reduction in					1	
mean weekly CSD total score	129/204	112/211	63.2 v 53.1	1.4 (0.9, 2.1)		
≥2.7 reduction in						1
mean weekly CSD total score	84/204	65/211	41.2 v 30.8	1.4 (0.9, 2.1)		-
≥30 mm reduction in						
Cough Severity VAS score	87/204	63/211	42.6 v 29.9	1.5 (1.0, 2.3)		<b>—</b>
Cough Seventy VAC Score						1
					0.5	1 1.5 2 2
					Odds	s Ratio
					Favors Placebo	Favors Gefapixant

Source: FDA Briefing Document, Figure 1

Gefapixant: gefapixant 45 mg. Change from baseline at Week 24 (Trial P030)/12 (Trial P027).



## **Safety**



- Taste disturbance
  - Common (2/3 of subjects)
  - Rapid onset (median 2 days)
  - Reversible upon discontinuation
  - Mild to moderate intensity
  - Impacts tolerability

## **Key Findings**



- Wide variability in baseline cough frequency
- High placebo response
- Small reduction in cough frequency compared to placebo
  - Relative reduction in geometric mean ratio 15-17%
  - Median absolute reduction ~1-2 coughs/hour beyond placebo
  - Statistical significance in 1 of 2 trials using validated recount cough data and prespecified analysis
- Small effect on some PRO endpoints
- Taste disturbances common

#### **Issues for Discussion**



- Small treatment difference in cough frequency reduction and PRO endpoints
  - Is the reduction in cough perceptible and meaningful to patients?

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  - Is the reduction in cough perceptible and meaningful to patients?
  - Do the PRO results show that small reduction in cough is meaningful?
    - Treatment differences small
    - Clinically meaningful improvements not established
    - Concerns about Leicester Cough Questionnaire (LCQ)
    - Lack of multiplicity control for other PRO endpoints

### **Issues for Discussion**



19

- Small treatment difference in cough frequency reduction and PRO endpoints
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    - Treatment differences small
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    - Concerns about Leicester Cough Questionnaire (LCQ)
    - Lack of multiplicity control for other PRO endpoints
  - Potential unblinding due to taste disturbances

## **Statute and Regulations**



- 1962 Drug Amendments (Kefauver-Harris) to the Federal Food, Drug, and Cosmetic Act (FD&C Act) included a provision requiring manufacturers of drug products to establish a drug's effectiveness by "substantial evidence" before approval
- An NDA can be rejected if, among other reasons:
- "...there is a <u>lack of substantial evidence</u> that the drug will have the effect it purports or is represented to have under the conditions of use prescribed, recommended, or suggested in the proposed labeling thereof; ..." (21 U.S.C. § 355(d)

"Totality of evidence" not in regulations

## Statutory Standard for Substantial Evidence of Effectiveness

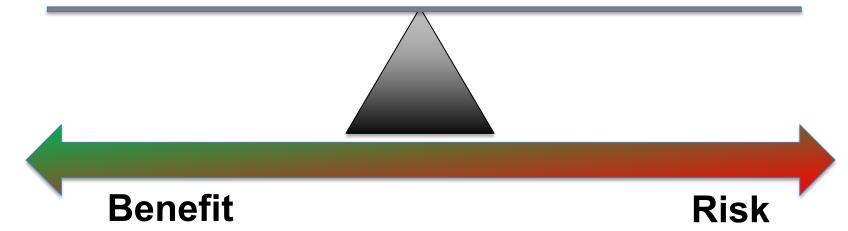


Substantial evidence is defined as:

"evidence consisting of <u>adequate and well-controlled investigations</u>, including clinical investigations, by experts qualified by scientific training and experience to evaluate the effectiveness of the drug involved, on the basis of which it could fairly and responsibly be concluded by such experts that the drug will have the effect it purports or is represented to have under the conditions of use prescribed, recommended, or suggested in the labeling or proposed labeling thereof" (21 U.S.C. § 355(d))

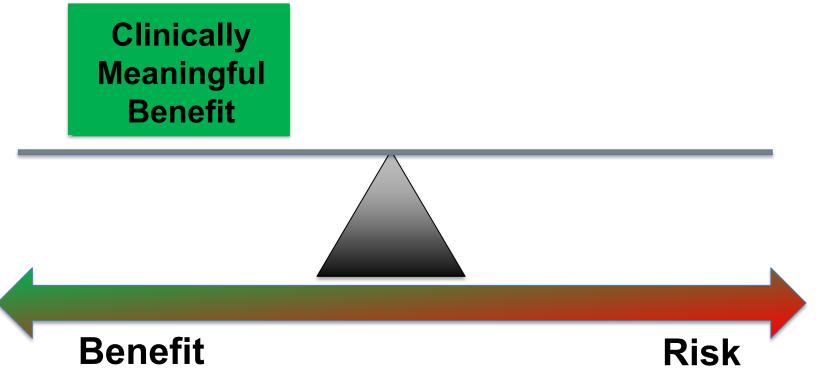


## **Benefit / Risk Framework**



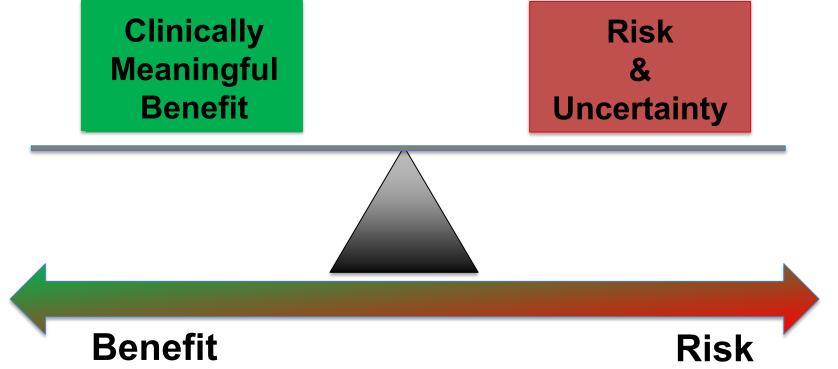


## **Benefit / Risk Framework**





## **Benefit / Risk Framework**



#### **Discussion Points**



- Discuss the evidence of effectiveness for gefapixant for the treatment of refractory or unexplained chronic cough in adults.
   Specifically address the following:
  - The small reduction in cough frequency compared to placebo and the clinical meaningfulness of the reduction in cough frequency
  - The observed results from PROs and whether these results provide compelling evidence to inform the clinical meaningfulness of the reduction in cough frequency
  - Potential unblinding of patients due to taste disturbance and its impact on interpretation of cough frequency and PRO results

#### **Discussion Points**



 Discuss the overall benefit/risk assessment of gefapixant for the treatment of adults with refractory or unexplained chronic cough, a symptomatic condition.

## **Voting Question**



- Does the evidence demonstrate that gefapixant provides a clinically meaningful benefit to adult patients with refractory or unexplained chronic cough, given the small reduction in cough frequency and results from PROs? Provide a rationale for your vote.
  - If you conclude that there is insufficient evidence of a clinically meaningful benefit, describe the evidence that could be collected to show a benefit that is clinically meaningful.





## FDA Pulmonary-Allergy Drugs Advisory Committee Meeting Clinical and Statistical Presentation

NDA 215010: Gefapixant for the Treatment of Refractory or Unexplained Chronic Cough in Adults

Rachel Bean, MD

Medical Officer

Division of Pulmonology, Allergy, and Critical Care (DPACC)

Office of Immunology and Inflammation (OII)

Office of New Drugs (OND)

Susan Mayo, MS
Statistical Reviewer
Division of Biometrics III (DB III)
Office of Biostatistics (OB)
Office of Translational Science (OTS)

Center for Drug Evaluation and Research (CDER)

U.S. Food and Drug Administration (FDA)

November 17, 2023

#### **Outline**



- Overview of the Clinical Program and Review of Safety
  - Rachel Bean, MD
- Statistical Review of Efficacy
  - Susan Mayo, MS
- Clinical Considerations
  - Rachel Bean, MD

#### **Outline**



- Overview of the Clinical Program and Review of Safety
  - Rachel Bean, MD
- Statistical Review of Efficacy
  - Susan Mayo, MS
- Clinical Considerations
  - Rachel Bean, MD



#### **OVERVIEW OF CLINICAL DEVELOPMENT PROGRAM**

### **Clinical Development History**



June: End of Phase

2 Meeting

September: Type C

Meeting

January: Complete Response

Letter Issued

March: Type A Meeting

July: Type C Meeting

2017

2020

2022

2023

July: Pre-NDA

Meeting

**December**: Initial

NDA Submission

January: Pre-NDA Meeting

June: NDA Resubmission

**November**: PADAC Meeting

### **Initial NDA and Complete Response**



- NDA submitted December 21, 2020
  - Two pivotal trials: P030 and P027

- Complete Response issued January 20, 2022
  - Insufficient validation of cough counting system
  - Additional concerns to be addressed
    - Small reduction in cough frequency of unclear clinical meaningfulness
    - Secondary endpoint results: not statistically persuasive; unclear meaningfulness

## Deficiencies in Producing the Unvalidated, Original Cough Counts



VitaloJAK device records coughs over 24 hours

510(k) cleared for recording only

Algorithm compresses recording

Used 3 non-equivalent unvalidated compression algorithms

No standardized process for algorithm selection for each recording

Coughs tagged by human cough analyst

No evidence of equivalence in tagging of compressed vs. uncompressed recordings

No evidence supporting analysts' equivalent performance

Figure generated by clinical reviewer.

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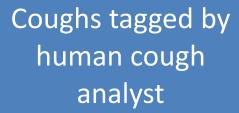
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Compression of all recordings to produce recounted cough counts

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Note: Validation of the VitaloJAK device and compression algorithm used in the gefapixant program is unique to the gefapixant pivotal trials and in no way implies validation beyond the existing 510(k) device clearance.



## **Clinical Development Program**

					No. of Sites and
Trial Identity	<b>Trial Population</b>	Trial Design	Number Treated, Regimen	Primary Endpoint	Countries
Phase 3 Pivotal Effi	cacy and Safety Trial	S			
P030	Adults with RCC	52-week, R, DB,	Total treated: 1314	24-hour cough frequency	175 sites in 20
	or UCC	PC, PG	• Gef 45 mg: 439	at Week 24	countries
			• Gef 15 mg: 440		
			• Placebo: 435		
P027	Adults with RCC	52-week, R, DB,	Total treated: 730	24-hour cough frequency	156 sites in 17
	or UCC	PC, PG	• Gef 45 mg: 243	at Week 12	countries
			• Gef 15 mg: 244		
			• Placebo: 243		
Phase 3b Suppleme	entary Efficacy and Sa	afety Trials			
P042	Adult females	12-week, R, DB,	Total treated: 375	Daily episodes of cough-	90 sites in 12
	with stress	PC, PG	• Gef 45 mg: 185	induced stress urinary	countries
	urinary		• Placebo: 190	incontinence at Week 12	
	incontinence and				
	RCC or UCC				
P043	Adults with	12-week, R, DB,	Total treated: 415	LCQ total score at Week 12	91 sites in 12
	recent-onset (<12	PC, PG	• Gef 45 mg: 206		countries
	months) RCC or		• Placebo: 209		
	UCC				
Phase 3 Supplement	tary Safety Trial				
P030 China specific	Adults with RCC or	52-week R, DB,	Total treated: 160	24-hour cough frequency at	20 sites in China
extension	UCC	PC, PG	•Gef 45 mg: 66	Week 24	
			•Gef 15 mg: 27		
			• Placebo: 67		

Source: Clinical reviewer. All treatment doses were given twice daily.



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## **Pivotal Trial Efficacy Endpoints**

- Primary endpoint
  - 24-hour cough frequency
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  - $\ge 1.3$ -point increase from baseline in LCQ total score (P030 only)
  - ≥ 30% reduction from baseline in 24-hour cough frequency
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  - ≥ 1.3-point reduction from baseline in mean weekly CSD total score
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  - ≥ 30 mm reduction from baseline in Cough Severity VAS score

## **Evaluating Efficacy via Cough Frequency**



- No regulatory precedent for primary endpoint for chronic cough (CC)
- FDA agreed to 24-hour cough frequency as primary efficacy endpoint

- Supporting rationale
  - Objective measure
  - Phase 2 data: 30% relative reduction in geometric mean ratio vs. placebo
- Challenges
  - Frequency is only one aspect of cough
  - No established threshold for meaningful within-patient change

# FDA

## **Pivotal Trial Efficacy Endpoints**

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## **PRO Endpoints for CC**



### Advantages

- Provide direct evidence of how patients feel
- Provide insight beyond objective cough frequency
  - Severity, coughing bouts, related symptoms

#### Limitations

- Lack of regulatory experience with PRO selection for CC indication
- Interpretation is complex and requires supportive evidence
- No established thresholds for meaningful within-patient change

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## **Trials Collected a Variety of PRO Endpoints**



- LCQ total score
  - The only multiplicity-controlled PRO endpoint (P030)
    - Responder analysis (≥1.3 points)

- Other PRO secondary endpoints were not multiplicity-controlled
  - LCQ total score: additional responder thresholds
  - LCQ domain-level endpoints
  - Cough Severity Diary (CSD)
  - Cough Severity Visual Analog Scale (VAS)

# Leicester Cough Questionnaire\* (LCQ)



#### **Physical domain**

# 8 items

Sputum
Tired
Cough with paints or fumes
Frequency of coughing bouts
Hoarse voice
Sleep
Energy

LCQ total score (3-21) \*Basis for the only multiplicitycontrolled PRO endpoint, in P030

#### **Psychological domain**

#### 7 items

Felt in control of cough
Worried about serious illness
Embarrassed
Concerned that others think
something is wrong with you
Anxious
Frustrated
Fed up

#### **Social domain**

#### 4 items

Interfered with job, daily tasks
Interfered with enjoyment of life
Interrupted conversation or
telephone calls
Annoyed partner, family, or
friends

www.fda.gov

Figure generated by clinical reviewer.

### **Cough Severity Diary (CSD)**

Used in exploratory analyses only



#### **Intensity** (2 items)

- Harshness
- Physical discomfort

#### Frequency (3 items)

- Cough
- Coughing fit or episode
- Urge to cough

#### **Disruptiveness** (2 items)

- Activities
- Sleep

**CSD** total score (0-10)

Figure generated by clinical reviewer.

Source: Martin Nguyen A, Bacci E, Dicpinigaitis P, Vernon M. Quantitative measurement properties and score interpretation of the Cough Severity Diary in patients with chronic cough. Ther Adv Respir Dis. 2020 Jan-

Dec:14:1753466620915155. doi: 10.1177/1753466620915155. PMID: 32345170:

PMCID: PMC7225816.

### **Cough Severity Visual Analog Scale (VAS)**

FDA

Used in exploratory analyses only

How severe was your Cough today?

Please rate the severity of your cough by tapping on the scale.
Please rate the **severity** of your cough today.



Source: Appendix 5 and Appendix 6 of the Applicant's response to the August 9, 2023, Information Request (1 of 2).



### **SAFETY OVERVIEW**



### **Taste Disturbances are Frequent and Non-Severe**

Taste-Related AEs Occurring in ≥1 Subject in Any Treatment Arm, ApAT, Pooled Safety Dataset

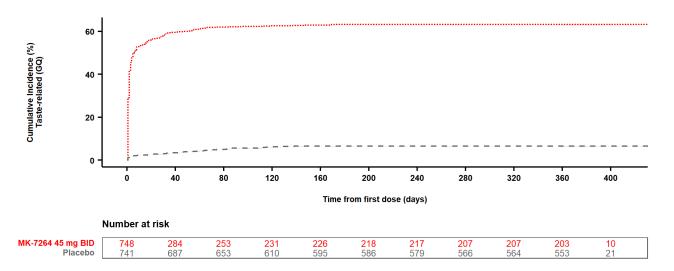
Preferred Term Maximum Intensity	Placebo N=675 n (%)	Gefapixant 15 mg N=686 n (%)	Gefapixant 45 mg N=683 n (%)
At least 1 taste-related AE	47 (7.0)	120 (17.5)	447 (65.4)
Mild	41 (6.1)	93 (13.6)	289 (42.3)
Moderate	6 (0.9)	25 (3.6)	141 (20.6)
Severe	0	2 (0.3)	17 (2.5)
Ageusia	6 (0.9)	16 (2.3)	100 (14.6)
Dysgeusia	36 (5.3)	78 (11.4)	281 (41.1)
Hypergeusia	2 (0.3)	2 (0.3)	5 (0.7)
Hypogeusia	4 (0.6)	22 (3.2)	73 (10.7)
Taste disorder	3 (0.4)	10 (1.5)	61 (8.9)

Source: Integrated Summary of Safety Table 5.3.5.3.3-cough: 31; confirmed by clinical reviewer. Abbreviations: AE, adverse event; APaT, all participants as treated; N, number of subjects in treatment arm; n, number of subjects with adverse event

### **Time to Onset of Taste-Related Disorders**



Safety Population (P027, P030, and P030 China extension)



#### **Cumulative Number of Patients with Event**

MK-7264 45 mg BID	0	445	464	468	470	473	473	473	473	473	473	
Placebo	0	26	37	45	48	48	48	48	48	48	48	

...... MK-7264 45 mg BID - - Placebo

Source: adae.xpt; Software: R

Abbreviations: BID, twice daily; GQ, grouped query

### **Taste Disturbances as a Potential Source of Bias**



# Subject/Investigator Knowledge

Informed consent and investigator's brochure



# Frequent Occurrence

2/3 of subjects in gefapixant 45 mg BID arm



#### **Possible Unblinding**

Potential bias impacting results

### **Outline**



- Overview of the Clinical Program and Review of Safety
  - Rachel Bean, MD
- Statistical Review of Efficacy
  - Susan Mayo, MS
- Clinical Considerations
  - Rachel Bean, MD



## **Pivotal Trial Efficacy Endpoints**

Landmark timepoints: P030 (Week 24), P027 (Week 12)
Cough frequency based on recounted data using validated method

- Primary endpoint
  - 24-hour cough frequency
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- Other secondary endpoints
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  - ≥ 30 mm reduction from baseline in Cough Severity VAS score



### **Multiplicity Hierarchy for Primary & Secondary Endpoints**

	P030 (all at Week 24)	P027 (all at Week 12)
1	Gefapixant 45 mg is superior to placebo in reducing 24-hour cough	Gefapixant 45 mg is superior to placebo in reducing 24-hour cough
	frequency	frequency
2	Gefapixant 45 mg is superior to placebo in reducing awake cough	Gefapixant 15 mg is superior to placebo in reducing 24-hour cough
	frequency	frequency
3	Gefapixant 45 mg is superior to placebo on the proportion of participants	Gefapixant 45 mg is superior to placebo in reducing awake cough
	with a ≥1.3-point increase from baseline in LCQ total score	frequency
4	Gefapixant 45 mg is superior to placebo with respect to the proportion of	Gefapixant 45 mg is superior to placebo with respect to the proportion of
	participants with a ≥30% reduction from baseline in 24-hour cough	participants with a ≥30% reduction from baseline in 24-hour cough
	frequency	frequency
5	Gefapixant 15 mg is superior to placebo in reducing 24-hour cough	Gefapixant 15 mg is superior to placebo in reducing awake cough
	frequency	frequency
6	Gefapixant 15 mg is superior to placebo in reducing awake cough	Gefapixant 15 mg is superior to placebo with respect to the proportion of
	frequency	participants with a ≥30% reduction from baseline in 24-hour cough
		frequency
7	Gefapixant 15 mg is superior to placebo on the proportion of participants	
	with a ≥1.3-point increase from baseline in LCQ total score	
8	Gefapixant 15 mg is superior to placebo with respect to the proportion of	
	participants with a ≥30% reduction from baseline in 24-hour cough	
	frequency	

Source: Section 10.8 for Multiplicity in trial protocols for P030 and P027.

Abbreviation: LCQ, Leicester Cough Questionnaire

## **Subject Disposition**



		Trial P030 at Week	24	1	Trial P027 at Week 12		
	Placebo n (%)	Gefapixant 15mg n (%)	Gefapixant 45mg n (%)	Placebo n (%)	Gefapixant 15mg n (%)	Gefapixant 45mg n (%)	
Randomized	436	442	439	244	244	244	
Treated (FAS)	435	440	439	243	244	243	
Discontinued Treatment	66 (15.2)	82 (18.6)	125 (28.5)	30 (12.3)	28 (11.5)	61 (25.0)	
- Adverse Event	21 (4.8)	34 (7.7)	88 (20.1)	7 (2.9)	8 (3.3)	40 (16.4)	
- Death	0	1 (0.2)	0	1 (0.4)	0	0	
- Lost to follow-up	5 (1.1)	2 (0.4)	3 (0.7)	0	0	0	
- Treatment noncompliance	0	0	2 (0.5)	0	0	0	
- Other*	5 (1.1)	5 (1.1)	5 (1.1)	1 (0.4)	1 (0.4)	2 (0.5)	
- Withdrawal by subject	37 (8.5)	44 (9.9)	30 (6.8)	21 (8.6)	20 (8.2)	21 (8.6)	
Discontinued Study	54 (12.4)	74 (16.6)	84 (19.2)	45 (18.4)	44 (18.0)	60 (24.5)	

 $Source: adbase.xpt; \ \ FDA \ statistical \ analyst. \ \ \ ^*Physician \ decision, \ Pregnancy, \ Other$ 

# **Subject Disposition**



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		Trial P030			Trial P027	
	Placebo	Gefapixant 15 mg	Gefapixant 45 mg	Placebo	Gefapixant 15 mg	Gefapixant 45 mg
Characteristic	N=435	N=440	N=439	N=243	N=244	N=243
Sex (n, %)						
Female	326 (74.9)	329 (74.8)	329 (74.9)	181 (74.5)	181 (74.2)	180 (74.1)
Male	109 (25.1)	111 (25.2)	110 (25.1)	62 (25.5)	63 (25.8)	63 (25.9)
Age (years)						
Mean (SD)	58 (12.6)	58.6 (11.4)	57.8 (12.4)	57.9 (13.1)	59.6 (11.7)	59.4 (13.1)
Median (min, max)	60 (19, 84)	60 (22, 88)	59 (19, 87)	61 (21, 81)	61 (22, 89)	61 (19, 85)
Primary diagnosis (n, %)						
Refractory CC	278 (63.9)	273 (62.0)	279 (63.6)	148 (60.9)	141 (57.8)	139 (57.2)
Unexplained CC	157 (36.1)	167 (38.0)	160 (36.4)	95 (39.1)	103 (42.2)	104 (42.8)
Duration of CC (n, %)						
<10 years	247 (56.8)	231 (52.5)	258 (58.8)	127 (52.3)	130 (53.3)	134 (55.1)
≥10 years	188 (43.2)	209 (47.5)	181 (41.2)	116 (47.7)	114 (46.7)	109 (44.9)
Duration of CC (years)						
Mean (SD)	10.7 (8.8)	11.9 (10.7)	10.9 (9.9)	11.7 (9.9)	11.8 (9.1)	11.2 (9.4)
Median (min, max)	8 (2, 51)	9 (1, 75)	7 (2, 65)	9 (2, 59)	9 (2, 45)	8 (2, 56)
24-Hour cough frequency (n, %)						
Mean (SD)	28.5 (24.6)	28.1 (22.2)	28.6 (29.9)	39.5 (81.1)	28.0 (22.0)	30.2 (39.4)
Median (min, max)	21.3 (0.7, 183.6)	22.1 (1.0, 151.6)	19.9 (0.2, 230.1)	26.1 (0.3, 1053.5)	21.8 (0.8, 132.8)	20.9 (0.2, 399.1)
Q1, Q3	12.4, 37.1	11.4, 39.5	10.9, 37.9	12.9, 45.5	13.2, 37.3	12.2, 36.2
Geometric mean	20.4	20.2	19.4	23.6	20.9	18.9

Source: FDA statistical analyst. Abbreviation: SD, standard deviation



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# **Primary Endpoint: 24-Hour Cough Frequency**



	Trial P030	(Week 24)	Trial P027 (Week 12)		
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg	
N^	419	409	222	217	
Geometric mean at baseline	20.4	19.4	23.6	18.9	
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4	
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)	
Relative reduction (%) in geometric mean ratio (95% CI)**		-14.6 (-26.0, -1.5)		-17.0 (-31.5, 0.6)	
p-value*		0.030		0.057	

Source: adeff.xpt; Table 4-2 in CSR Addenda for P030 and P027, validated by statistical analyst.

Geometric means were used because these frequency data were log-transformed.

N<sup>-</sup>: number of subjects who had baseline and postbaseline values

<sup>\*</sup> Based on the MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit

<sup>\*\*</sup> The estimated relative reduction (relative to placebo) is calculated by 100 (eDIFF -1). DIFF is the treatment difference in change from baseline at Week 24 (P030) or Week 12 (P027) based on the log-transformed data.

# **Primary Endpoint: 24-Hour Cough Frequency**



	Trial P030	(Week 24)	Trial P027 (Week 12)		
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg	
N^	419	409	222	217	
Geometric mean at baseline	20.4	19.4	23.6	18.9	
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4	
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)	
Relative reduction (%) in geometric mean ratio (95% CI) **		-14.6 (-26.0, -1.5)		-17.0 (-31.5, 0.6)	
p-value*		0.030		0.057	

Source: adeff.xpt; Table 4-2 in CSR Addenda for P030 and P027, validated by statistical analyst.

Geometric means were used because these frequency data were log-transformed.

N<sup>-</sup>: number of subjects who had baseline and postbaseline values

<sup>\*</sup> Based on the MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit

<sup>\*\*</sup> The estimated relative reduction (relative to placebo) is calculated by 100 (eDIFF -1). DIFF is the treatment difference in change from baseline at Week 24 (P030) or Week 12 (P027) based on the log-transformed data.





	Trial P030	(Week 24)	Trial P027 (Week 12)	
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
N^	419	409	222	217
Geometric mean at baseline	20.4	19.4	23.6	18.9
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)
Percent reduction from baseline	57%	63%	53%	61%
Relative reduction (%) in geometric mean ratio (95% CI)**		-14.6 (-26.0, -1.5)		-17.0 (-31.5, 0.6)
p-value*		0.030		0.057

Source: adeff.xpt; Table 4-2 in CSR Addenda for P030 and P027, validated by statistical analyst.

Geometric means were used because these frequency data were log-transformed.

N<sup>-</sup>: number of subjects who had baseline and postbaseline values

<sup>\*</sup> Based on the MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit

<sup>\*\*</sup> The estimated relative reduction (relative to placebo) is calculated by 100 (eDIFF -1). DIFF is the treatment difference in change from baseline at Week 24 (P030) or Week 12 (P027) based on the log-transformed data.

# Primary and Sensitivity Analyses for Relative Reduction (%) in 24-Hour Cough Frequency



Amount of missing data for primary endpoint: P030, Placebo 15%, 45 mg 21%; P027, Placebo 16%, 45 mg 20%

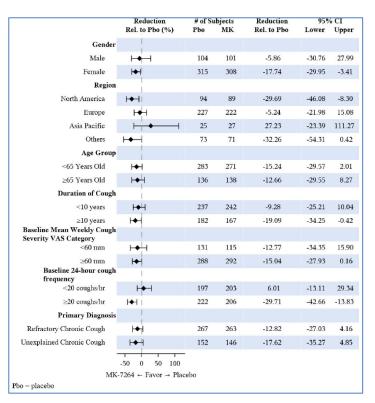
		P030		P027	
	Gefapixant 45 mg		Gefap	ixant 45 mg	
Sensitivity Analysis	vs.	Placebo	vs.	Placebo	
Primary analysis, original submission	-14.6	-26.1, -1.4)	-18.5	-32.9, -0.9)	
Primary analysis, MMRM	-14.6 ª	(-26.0, -1.5)	-17.0	(-31.5, 0.6)	
J2R – multiple imputation	-12.6	(-24.4, 0.9)	-14.9	(-30.6, 4.4)	
J2R – pattern mixture	-12.6	-22.5, -1.3)	-15.3	(-28.6, 0.5)	
MI+ANCOVA b	-13.1	-24.5, -0.1)	-17.1	-31.2, -0.1)	
MI+ANCOVA in subjects with baseline and at least one postbaseline value <sup>c</sup>	-14.5	-25.8, -1.6)	-17.1	(-31.7, 0.5)	
Primary analysis with 2 placebo outliers at baseline removed		n/a	-16.2	(-30.8 <i>,</i> 1.5)	

Source: Statistical analyst. J2R Source: 13 October 2023 Information Response. Abbreviations: ANCOVA, analysis of covariance; MI, multiple imputation; n/a, not applicable; J2R, jump to reference. <sup>a</sup> Tipping point analysis supported robustness of this result. <sup>b</sup> Results for Applicant's MI + ANCOVA (not prespecified) are described in the FDA briefing document. <sup>c</sup> Results for modification of Applicant's MI + ANCOVA in subjects with a baseline value and at least one postbaseline value (not prespecified) are described in the FDA briefing document.

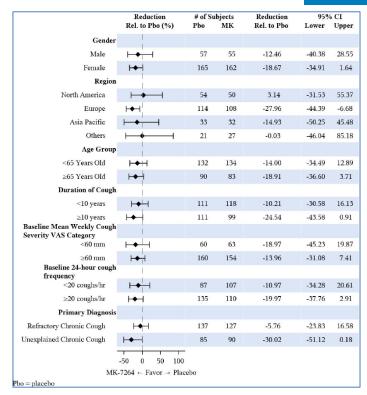
### 24-Hour Cough Frequency by Demographic and Baseline Disease Characteristic Subgroups



Trial P030 (Week 24)



Trial P027 (Week 12)



#### **Absolute 24-Hour Cough Frequency**

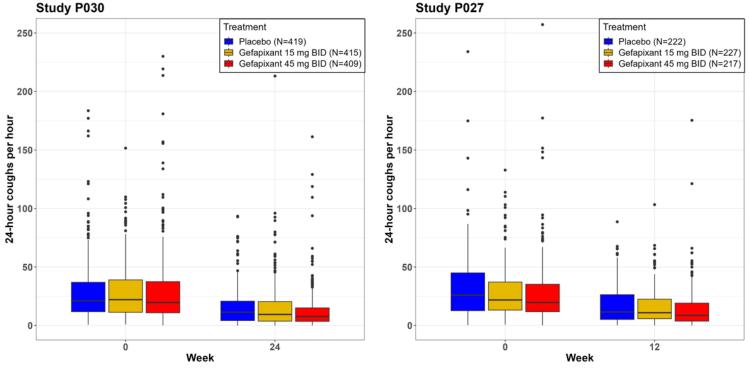


_	Trial P03	0 (Week 24)	Trial P027 (Week 12)		
 Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg	
N	419	409	222	217	
Median cough frequency at baseline (min, max)	21.3 (0.7, 184)	19.9 (0.2, 230)	26.1 (0.3, 1054)	20.9 (0.2, 399)	
Median cough frequency at Week 24/12	11.4	7.7	11.6	8.7	
Median change from baseline in cough frequency at Week 24/12	-8.7	-9.8	-8.9	-10.5	

Source: Statistical analyst

#### **Absolute 24-Hour Cough Frequency**



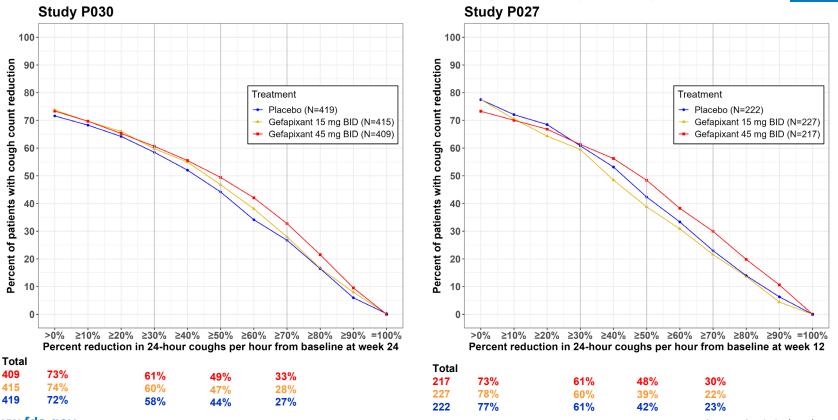


Source: Statistical analyst. For Trial P027, two subjects in the gefapixant 45 mg group at baseline, four subjects in the placebo group at baseline, and two subjects in the placebo group at week 12 had 24-hour cough frequency values greater than 250 and were not included in the figure. These eight subjects had 24-hour cough frequency ranged from 257.2 to 1053.5.

Change from baseline in 24-hour cough	Trial P030 (Week 24)		Trial P027 (Week 12)	
frequency	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
Median	-8.7	-9.8	-8.9	-10.5

# Proportion of Subjects with Percentage Reduction from Baseline in 24-Hour Cough Frequency









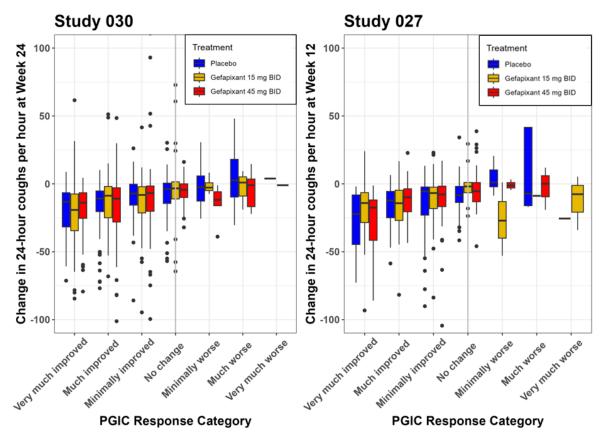
- Patient Global Impression of Change (PGIC) used as anchor scale for cough frequency
  - To understand what would be a meaningful amount of change in cough frequency from patients' perspective
  - Exploratory analysis
  - PGIC collected at Weeks 12 and 24 only

	red to the start of treatment, how you describe your cough now?
0	Very much improved
0	Much improved
0	Minimally improved
0	No change
0	Minimally worse
0	Much worse
0	Very much worse

Source: Appendix 1 of the Applicant's response to the FDA Information Request dated February 26, 2021

#### **Absolute Change in Cough Frequency and PGIC (Cont.)**





#### **Absolute Change in Cough Frequency and PGIC (Cont.)**



- Exploratory anchor-based analysis findings:
  - Low correlation between absolute change in cough frequency with PGIC score
  - Change in cough frequency occurs nearly independently from patientreported improvement in chronic cough as captured by PGIC
  - Patients who reported feeling better per the PGIC were not necessarily those patients who were coughing less
- Did not inform meaningfulness of change in cough frequency from patients' perspective



#### **Pivotal Trial Efficacy Endpoints**

Landmark timepoints: P030 (Week 24), P027 (Week 12)
Cough frequency based on recounted data using validated method

- Primary endpoint
  - 24-hour cough frequency
- Secondary endpoints, multiplicity-controlled
  - Awake cough frequency
  - ≥ 1.3-point increase from baseline in LCQ total score (P030 only)
  - ≥ 30% reduction from baseline in 24-hour cough frequency
- Other secondary endpoints
  - ≥ 1.3-point reduction from baseline in mean weekly CSD total score
  - ≥ 2.7-point reduction from baseline in mean weekly CSD total score
  - ≥ 30 mm reduction from baseline in Cough Severity VAS score



Variable	Trial PC	030 (Week 24)	Trial P027	(Week 12)
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
Awake cough frequency per hour				
N <sup>a</sup>	419	409	222	217
Geometric mean at baseline	26.9	25.2	31.4	25.0
Geometric mean at Week 24 or 12	11.3	9.0	13.8	9.6
Geometric mean ratio (95% CI) bc	0.43 (0.38, 0.47)	0.36 (0.32, 0.40)	0.46 (0.40, 0.53)	0.39 (0.33, 0.45)
Relative reduction (%) in geometric mean ratio (95% CI) $^{\rm c}$	ſ	-15.5 (-27.0, -2.3)		-16.3 (-31.2, 1.9)
p-value		0.023		0.076
≥1.3-point increase from baseline in LCQ total score				
n <sup>d</sup> /N <sup>d</sup> (%)	245/355 (69)	262/342 (77)		
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.4 (1.0, 2.0)		
p-value <sup>e</sup>		0.040		
Responder/N (%) <sup>f</sup>	245/415 (59)	262/419 (63)		
Estimated difference (%) (95% CI) <sup>g</sup>		3.3 (-3.3, 9.9)		
≥30% reduction from baseline in 24-hr cough frequency per	hour			
n <sup>d</sup> /N <sup>d</sup> (%)	245/368 (67)	248/347 (72)	135/205 (66)	133/194 (69)
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.2 (0.9, 1.7)		1.2 (0.8, 1.8)
p-value <sup>e</sup>		0.188		0.435
Responder/N (%) <sup>f</sup>	245/432 (57)	248/434 (57)	135/232 (58)	133/237 (56)
Estimated difference (%) (95% CI) <sup>g</sup>		0.4 (-6.1, 7.0)		-2.2 (-11.2, 6.8)

Source: Tables 4-4 and 4-10 in CSR Addenda, Table 14.2-22 in CSR of Trial P030, and Tables 4-3, 4-4 in CSR Addenda of Trial P030, \*\*. N=Number of subjects who had baseline and postbaseline values. \*Based on subjects with nonmissing values at baseline and Week 24. \*Based on the MMRM model for response variable of change from baseline in log-transformed awake cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value by visit. The estimated relative reduction (relative to placebo) is calculated by 100 (e<sup>367</sup> -1). DIF is the treatment difference in change from baseline at Week 24 based on the log-transformed data. \*N=Number of subjects with available data at Week 24, n=number of responders at Week 24. \*Based on the log-transformed data. \*N=Number of subjects with available data at Week 24, n=number of subjects with available subjects with a value subjects with a value of treatment, visit, treatment-by-visit interaction, gender, region, baseline, and baseline and post baseline values. \*N=number of subjects who had baseline values. \*N=number



Variable	Trial PC	30 (Week 24)	(Week 12)	
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
Awake cough frequency per hour				_
N <sup>a</sup>	419	409	222	217
Geometric mean at baseline	26.9	25.2	31.4	25.0
Geometric mean at Week 24 or 12	11.3	9.0	13.8	9.6
Geometric mean ratio (95% CI) bc	0.43 (0.38, 0.47)	0.36 (0.32, 0.40)	0.46 (0.40, 0.53)	0.39 (0.33, 0.45)
Relative reduction (%) in geometric mean ratio (95% CI) <sup>c</sup>		-15.5 (-27.0, -2.3)		-16.3 (-31.2, 1.9)
p-value		0.023		0.076
≥1.3-point increase from baseline in LCQ total score				
n <sup>d</sup> /N <sup>d</sup> (%)	245/355 (69)	262/342 (77)		
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.4 (1.0, 2.0)		
p-value <sup>e</sup>		0.040		
Responder/N (%) <sup>f</sup>	245/415 (59)	262/419 (63)		
Estimated difference (%) (95% CI)g		3.3 (-3.3, 9.9)		
≥30% reduction from baseline in 24-hr cough frequency per	hour			
n <sup>d</sup> /N <sup>d</sup> (%)	245/368 (67)	248/347 (72)	135/205 (66)	133/194 (69)
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.2 (0.9, 1.7)		1.2 (0.8, 1.8)
p-value <sup>e</sup>		0.188		0.435
Responder/N (%) <sup>f</sup>	245/432 (57)	248/434 (57)	135/232 (58)	133/237 (56)
Estimated difference (%) (95% CI)g		0.4 (-6.1, 7.0)		-2.2 (-11.2, 6.8)

Source: Tables 4-4 and 4-10 in CSR Addenda, Table 14.2-22 in CSR of Trial P030, and Tables 4-3, 4-4 in CSR Addenda of Trial P030, \*\*. N=Number of subjects who had baseline and postbaseline values. \*Based on subjects with nonmissing values at baseline and Week 24. \*Based on the MMRM model for response variable of change from baseline in log-transformed awake cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value by visit. The estimated relative reduction (relative to placebo) is calculated by 100 (e<sup>367</sup> -1). DIF is the treatment difference in change from baseline at Week 24 based on the log-transformed data. \*N=Number of subjects with available data at Week 24, n=number of responders at Week 24. \*Based on the log-transformed data. \*N=Number of subjects with available data at Week 24, n=number of subjects with available subjects with a value subjects with a value of treatment, visit, treatment-by-visit interaction, gender, region, baseline, and baseline and post baseline values. \*N=number of subjects who had baseline values. \*N=number



Variable	Trial P0	30 (Week 24)	Trial P027 (Week 12)	
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
Awake cough frequency per hour				
N a	419	409	222	217
Geometric mean at baseline	26.9	25.2	31.4	25.0
Geometric mean at Week 24 or 12	11.3	9.0	13.8	9.6
Geometric mean ratio (95% CI) bc	0.43 (0.38, 0.47)	0.36 (0.32, 0.40)	0.46 (0.40, 0.53)	0.39 (0.33, 0.45)
Relative reduction (%) in geometric mean ratio (95% CI) <sup>c</sup>		-15.5 (-27.0, -2.3)		-16.3 (-31.2, 1.9)
p-value		0.023		0.076
≥1.3-point increase from baseline in LCQ total score				
n <sup>d</sup> /N <sup>d</sup> (%)	245/355 (69)	262/342 (77)		
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.4 (1.0, 2.0)		
p-value <sup>e</sup>		0.040		
Responder/N (%) <sup>f</sup>	245/415 (59)	262/419 (63)		
Estimated difference (%) (95% CI) <sup>g</sup>		3.3 (-3.3, 9.9)		
≥30% reduction from baseline in 24-hr cough frequency per	hour			
n <sup>d</sup> /N <sup>d</sup> (%)	245/368 (67)	248/347 (72)	135/205 (66)	133/194 (69)
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.2 (0.9, 1.7)		1.2 (0.8, 1.8)
p-value <sup>e</sup>		0.188		0.435
Responder/N (%) <sup>f</sup>	245/432 (57)	248/434 (57)	135/232 (58)	133/237 (56)
Estimated difference (%) (95% CI) <sup>g</sup>		0.4 (-6.1, 7.0)		-2.2 (-11.2, 6.8)

Source: Tables 4-4 and 4-10 in CSR Addenda, Table 14.2-22 in CSR of Trial P030, and Tables 4-3, 4-4 in CSR Addenda of Trial P027.\* N=Number of subjects who had baseline and postbaseline values. Based on subjects with nonmissing values at baseline and Week 24. Eased on the MMRM model for response variable of change from baseline in log-transformed awake cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, he log-transformed baseline value by visit. The estimated relative reduction (relative to placebo) is calculated by 100 (e<sup>D07</sup>-1). DIFF is the treatment difference in change from baseline at Week 24 based on the log-transformed data.\* N=Nebroom of values in the value, and value in the value in the value of values in the value of values. Subjects with available that week 24, n=number of responders at Week 24. Based on the Nebroom of values in the value of values in the value of values. N=Nebroom of values in the value of values in the value of values in the value of values. Subjects with available of value of values in the value of values in the value of values. Subjects with value of values in the value of values in the value of values. Subjects with value of values in the value of values in the value of values. N=Nebroom of values in the value of values in the value of values in the value of values. Subjects with value of values in the value of values in the value of values. Subjects with value of values in the value of values in the value of values. N=Nebroom of values in the value of values. N=Nebroom of values in the value of valu



#### **Pivotal Trial Efficacy Endpoints**

Landmark timepoints: P030 (Week 24), P027 (Week 12)
Cough frequency based on recounted data using validated method

- Primary endpoint
  - 24-hour cough frequency
- Secondary endpoints, multiplicity-controlled
  - Awake cough frequency
  - ≥ 1.3-point increase from baseline in LCQ total score (P030 only)
  - ≥ 30% reduction from baseline in 24-hour cough frequency
- Other secondary endpoints
  - ≥ 1.3-point reduction from baseline in mean weekly CSD total score
  - ≥ 2.7-point reduction from baseline in mean weekly CSD total score
  - ≥ 30 mm reduction from baseline in Cough Severity VAS score

#### **PRO Secondary Endpoints: Percent Responder Odds Ratios**



Variable	Gefapixant	Placebo	Percent Responders (%)	Odds Ratio v. F	Placebo	
variable	n/Na	n/Na	(Gefapixant v. Placebo)	(95% CI)		
Study P030						
≥1.3 increase in	262/342	245/355	76.6 v 69.0	1.4 (1.0, 2.0)	p-value-= 0.040	
LCQ total score	202/342	243/333	70.0 V 09.0	1.4 (1.0, 2.0)	p value 0.040	
≥1.3 reduction in	253/331	237/346	76.4 v 68.5	1.5 (1.1, 2.1)	Г	
mean weekly CSD total score	200/001	2017040	70.4 7 00.0	1.0 (1.1, 2.1)		
≥2.7 reduction in mean weekly CSD total score	186/331	154/346	56.2 v 44.5	1.8 (1.3, 2.4)		<b>-</b>
≥30 mm reduction in Cough Severity VAS score	178/331	150/346	53.8 v 43.4	1.7 (1.2, 2.2)		<b>-</b>
<b>-</b>					Comparisons	
Study P027					are not	
≥1.3 increase in LCQ total score	134/194	123/196	69.1 v 62.8	1.3 (0.9, 2.0)	multiplicity- controlled	-
≥1.3 reduction in mean weekly CSD total score	129/204	112/211	63.2 v 53.1	1.4 (0.9, 2.1)	H	-
≥2.7 reduction in mean weekly CSD total score	84/204	65/211	41.2 v 30.8	1.4 (0.9, 2.1)	1	-
≥30 mm reduction in Cough Severity VAS score	87/204	63/211	42.6 v 29.9	1.5 (1.0, 2.3)		-
					0.5 Odds	1 1.5 2 2.5 s Ratio
					◆ Favors Placebo	Favors Gefapixant

Source: statistical analyst, and Tables 14.2-22, 11-5, 11-6, and 11-7 in Trial P030 CSR; Tables 11-7, 11-4, 11-5, and 11-6 in Trial P027 CSR. Gefapixant: gefapixant 45 mg. Change from baseline at Week 24 (Trial P030)/12 (Trial P027).

Odds ratio is based on the logistic regression model with terms of treatment, visit, treatment-by-visit interaction, gender, region, baseline, and baseline-by-visit interaction among subjects who had baseline and post baseline values. There was a small discrepancy in odds ratio results for ≥2.7 CSD reduction for Trial P027 compared to the Applicant's result.

n, number of responders at Week 24 for Trial P030 (Week 12 for Trial P027);

Na, number of subjects with available values at Week 24 for Trial P030 (Week 12 for Trial P027);

#### **PRO Secondary Endpoints: Percent Responder Differences**



/ariable	Gefapixant n/N <sup>b</sup>	Placebo n/N <sup>b</sup>	Percent Responders (%) (Gefapixant v. Placebo)	Estimated Difference (95% CI)	e (%)
Study P030					
≥1.3 increase in LCQ total score	262/419	245/415	62.5 v 59.0	3.3 (-3.3, 9.9)	
1.3 reduction in nean weekly CSD total score	253/437	237/434	57.9 v 54.6	3.2 (-3.4, 9.8)	-
2.7 reduction in nean weekly CSD total score	186/437	154/434	42.6 v 35.5	7.1 ( 0.6, 13.5)	-
30 mm reduction in Cough Severity VAS score	178/437	150/434	40.7 v 34.6		Comparisons are not
tudy P027					multiplicity-
1.3 increase in	134/236	123/229	56.8 v 53.7	2.8 (-6.2, 11.7)	controlled
1.3 reduction in nean weekly CSD total score	129/243	112/241	53.1 v 46.5	6.5 (-2.3, 15.3)	<u> </u>
2.7 reduction in nean weekly CSD total score	84/243	65/241	34.6 v 27.0	7.4 (-0.7, 15.6)	-
30 mm reduction in Cough Severity VAS score	87/243	63/241	35.8 v 26.1	9.4 ( 1.2, 17.6)	
					-10 -5 0 5 10 15 2 Estimated Difference
					Favors Placebo Favors Gefapixant

Source: statistical analyst, and Tables 14.2-22, 14.2-35, 14.2-36, and 14.2-43 in Trial P030 CSR; Tables 14.2-52, 14.2-34, 14.2-37, and 14.2-44 in Trial P027 CSR. Gefapixant: gefapixant 45 mg. Change from baseline at Week 24 (Trial P030)/12 (Trial P027).

Estimated difference is based on the stratified Miettinen and Nurminen method with gender and region.

n, number of responders at Week 24 for Trial P030 (Week 12 for Trial P027);

Nb, number of subjects who had baseline values

# FDA

#### **Summary of Efficacy Findings in Pivotal Trials**

- High placebo response with little added effect from gefapixant across endpoints
- Marginally statistically significant and small treatment differences in:
  - 24-hour cough frequency
  - Awake cough frequency
  - ≥ 1.3-point increase from baseline in LCQ total score (P030)
- No established threshold for meaningful within-patient change in:
  - Cough frequency
  - PRO endpoints
- Potential bias due to knowledge of taste disturbance
- Clinical interpretation of these findings is required

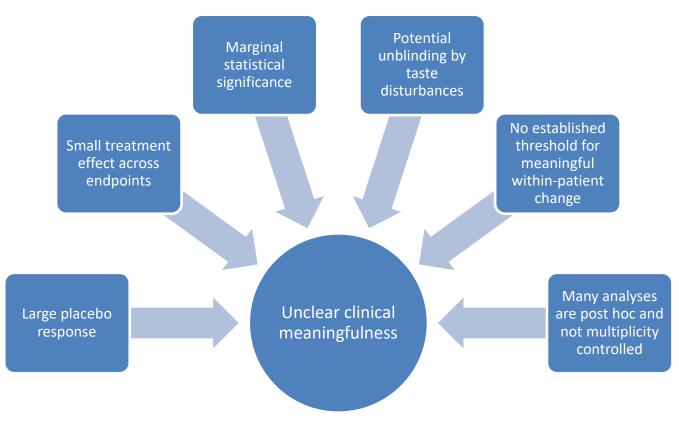
#### **Outline**



- Overview of the Clinical Program and Review of Safety
  - Rachel Bean, MD
- Statistical Review of Efficacy
  - Susan Mayo, MS
- Clinical Considerations
  - Rachel Bean, MD



#### **Clinical Interpretation of Efficacy is Challenging**







	Trial P030	030 (Week 24) Trial P027 (Week 12		
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
N	419	409	222	217
Geometric mean at baseline	20.4	19.4	23.6	18.9
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)
Percent reduction from baseline	57%	63%	53%	61%
Relative reduction (%) in geometric mean ratio (95% CI) **		-14.6 (-26.0, -1.5)		-17.0 (-31.5, 0.6)
p-value*		0.030		0.057

Geometric means were used because these frequency data were log-transformed.

<sup>\*</sup> Based on the MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit

<sup>\*\*</sup> The estimated relative reduction (relative to placebo) is calculated by 100 (eDIFF -1). DIFF is the treatment difference in change from baseline at Week 24 (P030) or Week 12 (P027) based on the log-transformed data.





	Trial P030	(Week 24)	Trial P027	(Week 12)
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
N^	419	409	222	217
Geometric mean at baseline	20.4	19.4	23.6	18.9
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)
Percent reduction from baseline	57%	63%	53%	61%
Relative reduction (%) in geometric mean ratio (95% CI) **		-14.6 (-26.0, -1.5)		-17.0 (-31.5, 0.6)
p-value*		0.030		0.057

Geometric means were used because these frequency data were log-transformed.

N<sup>-</sup>: number of subjects who had baseline and postbaseline values

<sup>\*</sup> Based on the MMRM model for response variable of change from baseline in log-transformed 24-hour cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value, and the interaction of log-transformed baseline value by visit

<sup>\*\*</sup> The estimated relative reduction (relative to placebo) is calculated by 100 (eDIFF -1). DIFF is the treatment difference in change from baseline at Week 24 (P030) or Week 12 (P027) based on the log-transformed data.





	Trial P030	(Week 24)	Trial P027	(Week 12)
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
N^	419	409	222	217
Geometric mean at baseline	20.4	19.4	23.6	18.9
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)
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	Trial P030 (Week 24) Trial P02		Trial P027	7 (Week 12)	
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg	
N^	419	409	222	217	
Geometric mean at baseline	20.4	19.4	23.6	18.9	
Geometric mean at Week 24 or 12	8.7	7.1	10.6	7.4	
Geometric mean ratio (95% CI)*	0.43 (0.39, 0.48)	0.37 (0.33, 0.41)	0.47 (0.41, 0.54)	0.39 (0.34, 0.45)	
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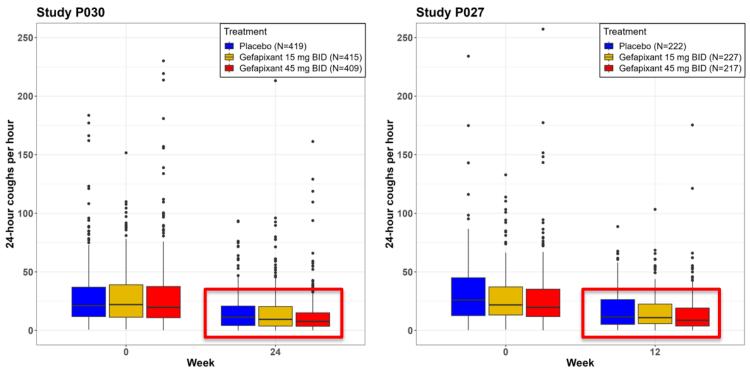
N<sup>^</sup>: number of subjects who had baseline and postbaseline values

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<sup>\*\*</sup> The estimated relative reduction (relative to placebo) is calculated by 100 (eDIFF -1). DIFF is the treatment difference in change from baseline at Week 24 (P030) or Week 12 (P027) based on the log-transformed data.

#### **24-Hour Cough Frequency**

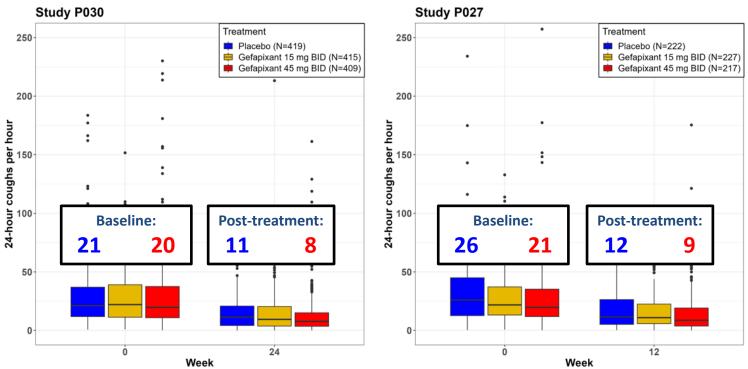




Source: Statistical analyst. For Trial P027, two subjects in the gefapixant 45 mg group at baseline, four subjects in the placebo group at baseline, and two subjects in the placebo group at week 12 had 24-hour cough frequency values greater than 250 and were not included in the figure. These eight subjects had 24-hour cough frequency ranged from 257.2 to 1053.5.

#### **24-Hour Cough Frequency**

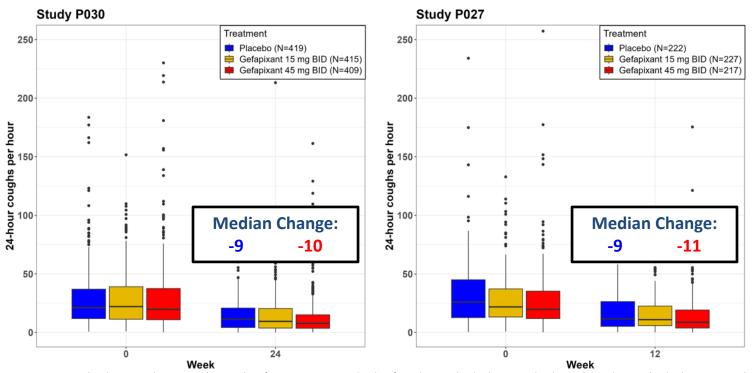




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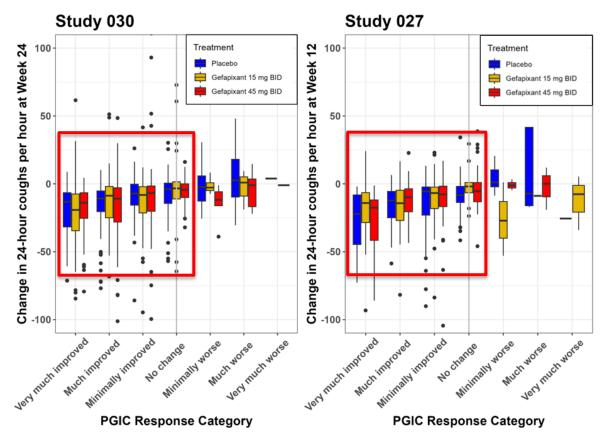




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#### **Absolute Change in Cough Frequency and PGIC**







Variable	Trial PO	30 (Week 24)	Trial P027 (Week 12)	
Statistic	Placebo	Gefapixant 45 mg	Placebo	Gefapixant 45 mg
Awake cough frequency per hour				
N a	419	409	222	217
Geometric mean at baseline	26.9	25.2	31.4	25.0
Geometric mean at Week 24 or 12	11.3	9.0	13.8	9.6
Geometric mean ratio (95% CI) bc	0.43 (0.38, 0.47)	0.36 (0.32, 0.40)	0.46 (0.40, 0.53)	0.39 (0.33, 0.45)
Relative reduction (%) in geometric mean ratio (95% CI) <sup>c</sup>		-15.5 (-27.0, -2.3)		-16.3 (-31.2, 1.9)
p-value		0.023		0.076
≥1.3-point increase from baseline in LCQ total score				
n <sup>d</sup> /N <sup>d</sup> (%)	245/355 (69)	262/342 (77)		
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.4 (1.0, 2.0)		
p-value <sup>e</sup>		0.040		
Responder/N (%) <sup>f</sup>	245/415 (59)	262/419 (63)		
Estimated difference (%) (95% CI) <sup>g</sup>		3.3 (-3.3, 9.9)		
≥30% reduction from baseline in 24-hr cough frequency per	hour			
n <sup>d</sup> /N <sup>d</sup> (%)	245/368 (67)	248/347 (72)	135/205 (66)	133/194 (69)
Odds ratio vs. placebo (95% CI) <sup>e</sup>		1.2 (0.9, 1.7)		1.2 (0.8, 1.8)
p-value <sup>e</sup>		0.188		0.435
Responder/N (%) <sup>f</sup>	245/432 (57)	248/434 (57)	135/232 (58)	133/237 (56)
Estimated difference (%) (95% CI) <sup>g</sup>		0.4 (-6.1, 7.0)		-2.2 (-11.2, 6.8)

Source: Tables 4-4 and 4-10 in CSR Addenda, Table 14.2-22 in CSR of Trial P030, and Tables 4-3, 4-4 in CSR Addenda of Trial P030, \*\*. N=Number of subjects who had baseline and postbaseline values. \*Based on subjects with nonmissing values at baseline and Week 24. \*Based on the MMRM model for response variable of change from baseline in log-transformed awake cough frequency, adjusted for covariates including treatment, visit, the interaction of treatment by visit, gender, region, the log-transformed baseline value by visit. The estimated relative reduction (relative to placebo) is calculated by 100 (e<sup>367</sup> -1). DIF is the treatment difference in change from baseline at Week 24 based on the log-transformed data. \*N=Number of subjects with available data at Week 24, n=number of responders at Week 24. \*Based on the log-transformed data. \*N=Number of subjects with available data at Week 24, n=number of subjects with available subjects with a value subjects with a value of treatment, visit, treatment-by-visit interaction, gender, region, baseline, and baseline and post baseline values. \*N=number of subjects who had baseline values. \*N=number



Variable	Trial PO	30 (Week 24)	Trial P027	(Week 12)
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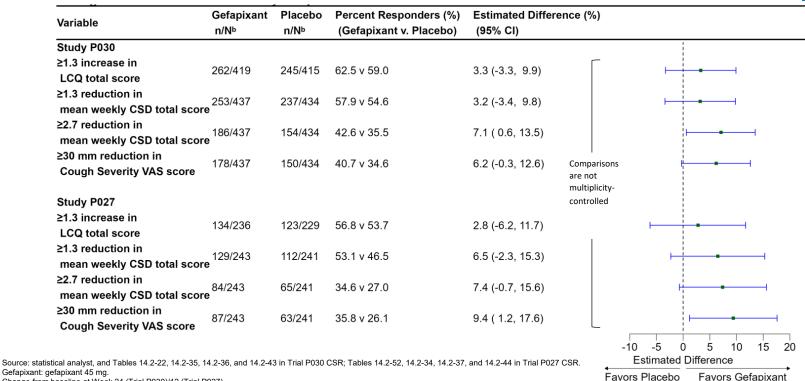


Variable	Trial P030 (Week 24)		Trial P027 (Week 12)	
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#### **PRO Secondary Endpoints: Percent Responder Differences**



Gefapixant: gefapixant 45 mg.

Change from baseline at Week 24 (Trial P030)/12 (Trial P027).

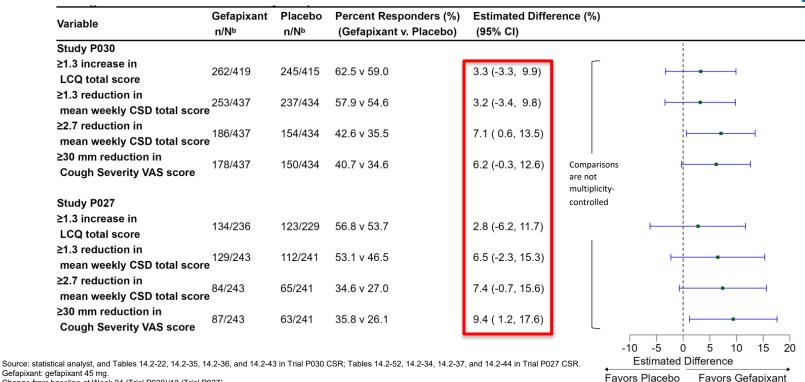
Estimated difference is based on the stratified Miettinen and Nurminen method with gender and region.

Nb, number of subjects who had baseline values

n. number of responders at Week 24 for Trial P030 (Week 12 for Trial P027):



#### **PRO Secondary Endpoints: Percent Responder Differences**



Gefapixant: gefapixant 45 mg.

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n. number of responders at Week 24 for Trial P030 (Week 12 for Trial P027):

Nb, number of subjects who had baseline values

#### **Clinical Efficacy Summary**



- Patients improved whether on placebo or gefapixant
- Small reduction in cough frequency compared to placebo
  - Marginal statistical significance in 1 of 2 trials
  - Coughing less often did not correlate with feeling better (per PGIC)
  - No identifiable subgroup of "responders"
    - Demographic / baseline disease characteristics
    - Higher percent reductions from baseline
  - Unclear if effect is meaningful or perceptible

#### **Clinical Efficacy Summary**



#### LCQ results

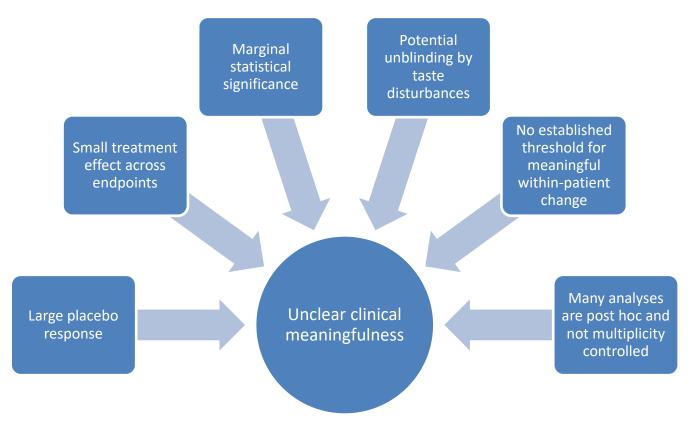
- Concerns about content validity of instrument
- Concerns about ≥ 1.3-point increase to define "responders"
- Concerns about meaningfulness of the change in total score

#### Other PRO endpoints

- None controlled for multiplicity
- No evidence to support selected "responder" thresholds
- Small differences from placebo in "responders" and total scores



#### **Clinical Interpretation of Efficacy is Challenging**







## FDA Pulmonary-Allergy Drugs Advisory Committee Meeting Charge to the Committee

NDA 215010: Gefapixant for the Treatment of Refractory or Unexplained Chronic Cough in Adults

**Stacy Chin, MD** 

**Clinical Team Leader** 

Division of Pulmonology, Allergy, and Critical Care

Office of Immunology and Inflammation / Office of New Drugs

**Center for Drug Evaluation and Research** 

**U.S. Food and Drug Administration** 

**November 17, 2023** 

#### **Proposed Use: Gefapixant**



- New molecular entity
- Treatment of refractory or unexplained chronic cough
- Common symptomatic condition with no approved therapies
- Novel indication
  - No precedent for study design or efficacy endpoints
  - No experience with interpretation of results

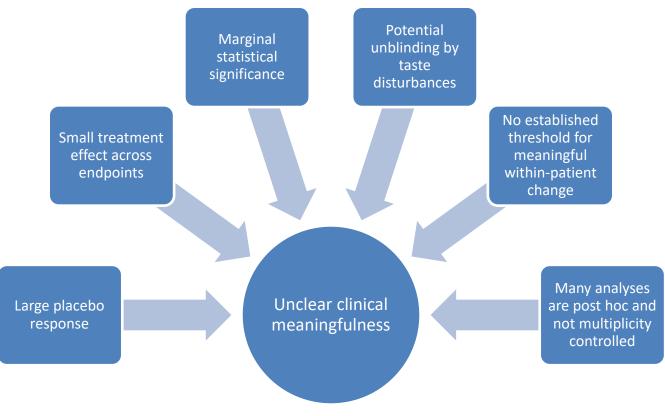
### **Key Findings in the Gefapixant Program**



- Wide variability in baseline cough frequency
- High placebo response
- Small reduction in cough frequency compared to placebo
  - Relative reduction in geometric mean ratio 15-17%
  - Median absolute reduction ~1-2 coughs/hr beyond placebo
  - Statistical significance in 1 of 2 trials using validated recount cough data and prespecified analysis
- Small effect on some PRO endpoints
- Taste disturbances common

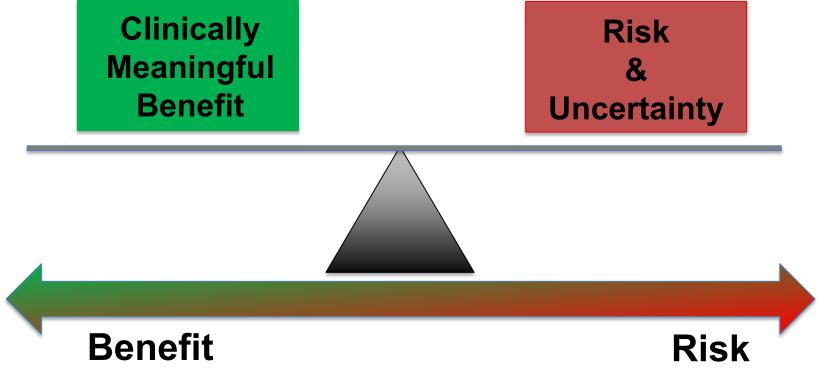


#### **Clinical Interpretation of Efficacy is Challenging**





### **Benefit / Risk Framework**



#### **Discussion Points**



- Discuss the evidence of effectiveness for gefapixant for the treatment of refractory or unexplained chronic cough in adults.
   Specifically address the following:
  - The small reduction in cough frequency compared to placebo and the clinical meaningfulness of the reduction in cough frequency
  - The observed results from PROs and whether these results provide compelling evidence to inform the clinical meaningfulness of the reduction in cough frequency
  - Potential unblinding of patients due to taste disturbance and its impact on interpretation of cough frequency and PRO results

#### **Discussion Points**



 Discuss the overall benefit/risk assessment of gefapixant for the treatment of adults with refractory or unexplained chronic cough, a symptomatic condition.

#### **Voting Question**



- Does the evidence demonstrate that gefapixant provides a clinically meaningful benefit to adult patients with refractory or unexplained chronic cough, given the small reduction in cough frequency and results from PROs? Provide a rationale for your vote.
  - If you conclude that there is insufficient evidence of a clinically meaningful benefit, describe the evidence that could be collected to show a benefit that is clinically meaningful.





## Back-up Slides Shown

#### **Amount of Missing Data in Cough Frequency**

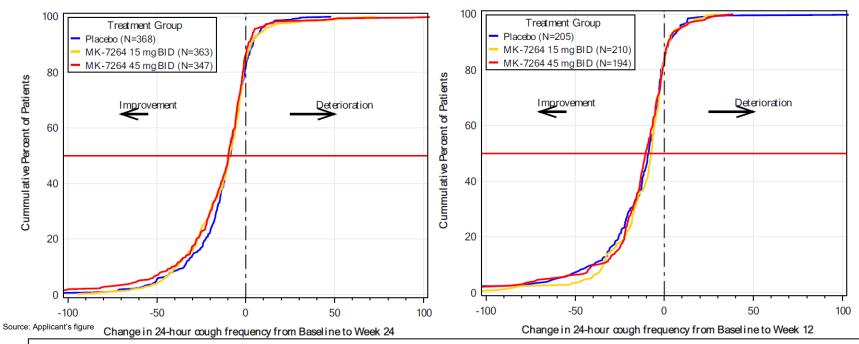


	Trial P030 at Week 24			Trial P027 at Week 12		
	Placebo	Gefapixant 15mg	Gefapixant 45mg	Placebo	Gefapixant 15mg	Gefapixant 45mg
Randomized	436	442	439	244	244	244
Treated (FAS)	435	440	439	243	244	243
Included in primary analysis (baseline and post-baseline cough frequency) among FAS	419	415	409	222	227	217
Excluded from primary analysis for cough frequency but in FAS	16	25	30	21	17	26
Cough frequency available at Week 24 (12)	368	363	347	205	210	194
Amount of missing Data in cough frequency at Week 24 (12)	15.4%	17.5%	21.0%	15.6%	13.9%	20.2%

Source: FDA statistical reviewer

## Empirical Cumulative Distribution Function of Absolute Change From Baseline in Cough Frequency, P030 (Week 24) and P027 (Week 12)





The cumulative distribution function curves display a continuous view of the change in 24-hour cough frequency from baseline on the x-axis and the cumulative percent of patients reporting up to that level of change at Week 24 (or Week 12) on the y-axis.



# 24-Hour Cough Frequency by Whether Subjects Experienced Taste Disturbance

	Subjects Expe	riencing Taste Distu	ırbance	Subjects Not Experiencing Taste Disturbance		
Trial P030 (Week 24)		Gefapixant	Gefapixant		Gefapixant	Gefapixant
Statistic	Placebo	15 mg	45 mg	Placebo	15 mg	45 mg
N	38	86	283	381	329	126
Geometric mean at baseline	21.5	22.6	20.4	20.3	19.6	17.2
Geometric mean at week 24	9.0	10.3	7.0	8.7	7.8	7.5
Geometric mean ratio*	0.42	0.46	0.34	0.43	0.40	0.44

	Subjects Experiencing Taste Disturbance			Subjects Not Experiencing Taste Disturbance			
Trial P027 (Week 12)		Gefapixant	Gefapixant		Gefapixant	Gefapixant	
Statistic	Placebo	15 mg	45 mg	Placebo	15 mg	45 mg	
N	10	29	134	212	198	83	
Geometric mean at baseline	36.8	21.5	22.1	23.1	20.8	14.7	
Geometric mean at Week 24	14.9	11.3	7.5	10.4	10.1	7.2	
Geometric mean ratio*	0.41	0.52	0.34	0.45	0.48	0.49	

Source: adeff.xpt; statistical analyst.

Geometric means were used because these frequency data were log-transformed.

Abbreviations: N, number of subjects who had baseline and postbaseline assessments

<sup>\*</sup> Based on subjects with nonmissing values at baseline and Week 24.