

Streamlining HABP/VABP Trials Project

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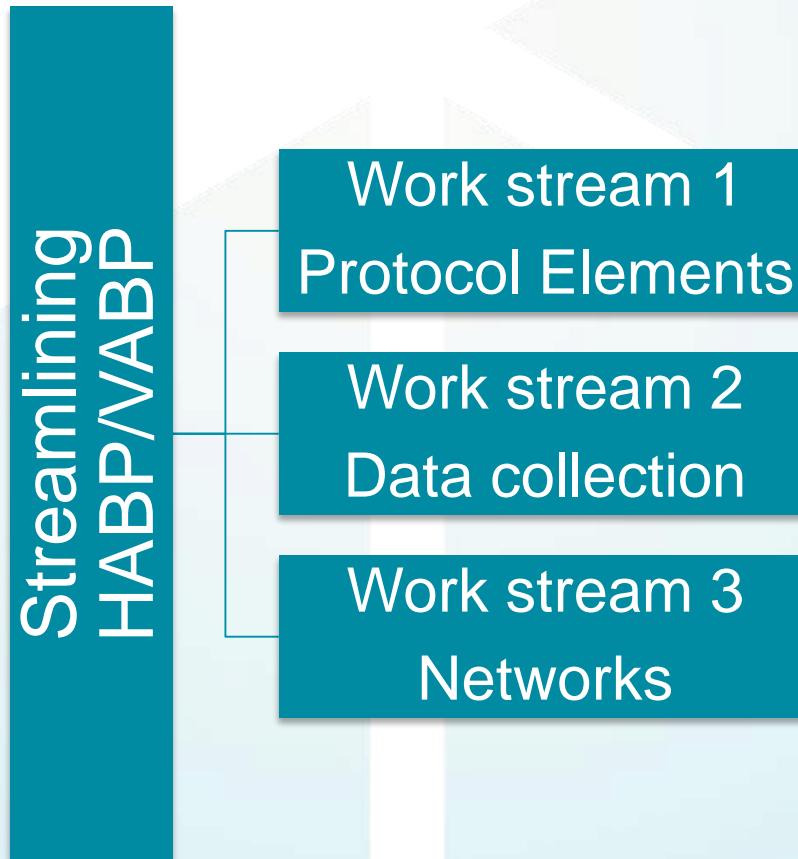
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Streamlining HABP/VABP Trials



Workstream 1: Protocol Elements

Objectives

Identify barriers and seek solutions for the successful conduct of HABP/VABP studies

Deliverables:

Recommendations on alternate study design elements to overcome barriers in HABP/VABP studies

Protocol Elements: Activities

18 APR
2013

- Understanding issues in antibacterial drug development
- Webinar in advance of Workshop

22-23 APR
2013

- Applying Quality by Design (QbD) principles to HABP/VABP protocols

29 AUG
2013

- Developing streamlined elements for HABP/VABP studies
- Webinar

Current

- Recommendations and Publication
- Finalized Q2

Issues and Barriers Identified

- Obtaining informed consent
- Inclusion criteria
 - Prior Antibacterial Therapy (PAT)
 - Concern that inclusion criteria may be too restrictive regarding underlying disease and co-morbidities
- Combining HABP and VABP patients
- Need for diagnostics and biomarkers
- Choice of active comparator
- Use of rescue/other non-study antimicrobial drug therapy
- Primary Endpoint Rationale for All-Cause Mortality vs Clinical Response

Public Discussion/Data Review led to Change

See revised FDA HABP/VABP Guidance May 2014:

- ▶ Single HABP/VABP trial with supportive evidence
- ▶ Allow 24 hrs PAT; sensitivity analysis
- ▶ Use of Gram stain as part of enrollment criteria and ITT as primary analysis population; sensitivity analysis in the microbiological ITT
- ▶ Approved active comparators not labeled for HABP/VABP
- ▶ Risk difference acceptable if control mortality rates are low; use of odds ratio from primary analysis is not required

Direction of Protocol Elements Recommendations

➤ Informed Consent

- More training for staff obtaining informed consent
- Approach patient/ legally authorized representative (LAR) earlier, Research Advanced Directives (RAD)

➤ Use of Centralized IRB

➤ Expand Inclusion Criteria: include patients who may have been traditionally excluded from HABP/VABP trials

➤ Enrich: Rapid Diagnostics and Severity of Illness Score

➤ Primary efficacy endpoint using All Cause Mortality

- Explore clinical response endpoint

Workstream 2: Data Collection

Objectives

Simplify and reduce the amount of (safety) data collected in HABP/VABP studies

Deliverables

Recommendations on critical data to be collected to simplify data collection

Data Collection

12 NOV
2013

- Optimizing operational efficiencies for data collection in HABP/VABP trials
- Challenges in data collection for HABP/VABP trials
- Regulatory requirements for AE data collection in registration trials
- Strategies to simplify data collection using a QbD approach

5 SEP
2014

- F2F team meeting
- Draft manuscript review

Current

- Recommendations and Publication
- Q2

Direction of Data Collection Recommendations

- Regulatory framework already exists to support streamlining
 - Report SAEs consistent with FDA/EMA regulations
 - Discuss proposed streamlined approach with regulators
- See CTTI Recommendations:
 - http://www.ctti-clinicaltrials.org/briefing-room/official-recommendations#IND_Safety
- Data collection should be pre-specified in protocol
- Consider less frequent/abbreviated data collection:
 - Vital signs, arterial blood gas, electrolytes
 - Non-serious AEs not associated with drug discontinuation
 - Concomitant medications
 - Sedatives/analgesics e.g. for patients on sedation drips with mechanical ventilation where doses are frequently titrated and changed....consider capturing this info as “days on/off”

Streamlining data collection recommendations

Protocol elements recommendations

Add'l input from stakeholders

Site Networks

Demonstration HABP/VABP Pilot study

Thank you.



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