



Design Strategies to Improve the Feasibility of HABP-VABP Registration Studies

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“Some people think design means how it looks. But of course, if you dig deeper, it’s really how it works...”

Steve Jobs

Since the 2009 Workshop.....

- * Draft guidance HABP/VABP (Nov 2010)
- * 1st HABP/VABP Trius Advisory Board (May 2011)
- * FDA Workshop “Inherent trade-offs in precision of estimates of efficacy and safety for a drug and practicality/feasibility of clinical trials” (Nov 2011)
- * October 2012.....

The Objective is to Design a Study that Is feasible while Maintaining Scientific Integrity

What Are The Areas Where Trade –offs Are Acceptable?
Is There a Flexible Framework That Can Fit Most Situations?

Main Determinants of Study Feasibility in HABP/VABP

1. Primary outcome measure
2. Primary analysis set
3. Adjunctive therapy: Risk of confounding effect on target pathogens
4. NI margin
5. Prior antibiotic use

The Endpoint

- * The “**traditional**”: Clinical response
 - * Ok in clinical medicine
 - * “Weak” in clinical research: neither well defined nor reliable
- * The “**unambiguous**”: All cause mortality (ACM)
 - * Clinically relevant, “Well defined” and “reliable”
- * The “**composite**” endpoint
 - * It depends on what’s in it
 - * Ability to set an NI margin?
- * The “**surrogate**” for outcome
 - * Are there any?

The Primary Efficacy Analysis Set

- * Defines evaluable population for the primary outcome measure
 - * Drives the size of the study
- * Issue: no “gold standard” for the diagnosis of HABP/VABP
- * May range widely from ITT to MITT
 - * ITT: uncertainty that patients have the disease
 - * Essentially clinically-based
 - * Risk of misdiagnosis: Confounding underlying/concomitant conditions
 - * Micro-ITT (MITT) : Essentially culture-based
 - * False positive as many sites use endotracheal suction
 - * Unlike in CABP, microbiology has inherent limitations in VABP
 - * Questionable feasibility in global trials, particularly for narrow spectrum Abx or MDR pathogens
 - * Impact of prior Abx on culture results
 - * Modified-ITT (mITT) : clinically- and microbiologically-based

Can we trade off by redefining the primary analysis set as a modified ITT (mITT)?

- * Objectives: define a primary analysis set where $ITT > mITT > MITT$
 - * Goal: Strong plausibility that patients have the disease of interest in spite of some unavoidable level of uncertainty, as in the clinics
- * Ingredients of an mITT
 - * Solid clinical criteria:
 - * Increased probability of correct diagnosis (Klompas et al, 2007) &
 - * Ventilated patients with HABP and VABP &
 - * Procalcitonin increased at baseline?
 - * Microbiology: exclude patients with negative gram stain at baseline
 - * **Positive respiratory culture at baseline in prespecified X% patients, with X adjusted based on expected size of ME population OR**
 - * Positive *Gram stain* on baseline respiratory sample

The NI Margin

- * Is a 10% NI margin too conservative?
- * Is the NI margin another area where a “trade off” is possible?

In Summary

1. Investigate the disease in ventilated patients only
2. Keep the ACM as the primary outcome measure
3. Since no ***certainty*** in the diagnosis of HABP/VABP, focus on **high *plausibility*** of diagnosis
 - Redefine the primary efficacy analysis set by defining a realistic though solid mITT analysis set instead of a too restrictive Micro-ITT set requiring a positive culture in all patients
4. Address the impact of confounding adjunctive therapy on study size
5. Can less conservative statistical approaches (i.e., NI>10%) be considered?