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4 **Guideline on clinical investigation of medicinal products**
5 **for the treatment of chronic heart failure**
6 **Draft**

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8 This guideline replaces the *Note for Guidance on clinical investigation of medicinal products for the*
9 *treatment of cardiac failure (CPMP/EWP/235/95, Rev 1).*

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Comments should be provided using this [template](#). The completed comments form should be sent to CVSWPsecretariat@ema.europa.eu.

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Keywords	<i>chronic heart failure, heart failure with preserved ejection fraction, heart failure with reduced ejection fraction, hospitalisation, clinical trial, mortality, functional capacity, exercise testing, patient related outcomes</i>
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14 **for the treatment of chronic heart failure**

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56 Executive summary
57 This guideline addresses the EU regulatory position on the clinical development of new medicinal
58 products in the treatment of patients with chronic heart failure (CHF). The aim of this document is to
59 update the *Note for guidance on clinical investigation of medicinal products for the treatment of cardiac*
60 *failure (CPMP/EWP/235/95, Rev. 1)*. The principal changes from the previous document relate to:
61 (i) differentiation of types of heart failure between reduced and preserved ejection fraction;
62 (ii) inclusion of patients that are clinically stable early after hospitalisation for heart failure;
63 (iii) description of ways to measure morbidity;
64 (iv) assessment of efficacy criteria and the need for morbidity and mortality trials.

65 **1. Introduction (background)**

66 It is recognised that chronic heart failure (CHF) encompasses heterogeneous groups of patients with a
67 wide spectrum of symptoms and different causes, resulting from an abnormality of cardiac structure or
68 function. Within this spectrum, patients may either have heart failure with reduced ejection fraction
69 (HFrEF) or heart failure with a moderately reduced or largely preserved ejection fraction (HFpEF) (1).
70 The distinction between patients with HFrEF from those with HFpEF is important because they
71 represent groups with different underlying pathophysiologic, haemodynamic and neurohormonal
72 abnormalities, distinctly different clinical characteristics, and dissimilar efficacy of existing therapies(2).

73 Patients with CHF may experience reoccurring episodes of decompensation requiring hospitalisation.
74 Reoccurring hospitalisations for heart failure (HFH) are relatively common in patients with CHF and
75 despite their significance they are rarely used as an endpoint in clinical trials compared to "time to first
76 HF hospitalisation"(3,4). Accounting for reoccurring events may further characterise and quantify the
77 occurrence of morbid events throughout the follow-up period, but experience is limited and the
78 approach gives rise to additional methodological issues.

79 One of the main therapeutic goals in the treatment of CHF is to improve survival. Some drug classes
80 (ACE-inhibitors, beta-blockers, mineralocorticoid receptor antagonists, If channel blockers,
81 vasopeptidase inhibitors) have shown to improve prognosis in patients with CHF while other classes
82 (e.g. certain inotropes) have had a detrimental effect on survival despite a short term positive effect
83 on intermediate endpoints. In general, mortality/morbidity data should be provided prior to approval of
84 new therapeutic agents for the treatment of CHF. However, under certain conditions and when there is
85 an unmet medical need, a sizeable and meaningful effect on one or more relevant clinical endpoints
86 may lead to approval of a medicinal product provided that the cardiovascular safety profile is
87 adequately characterised(5,6).

88 **2. Scope**

89 The scope of this guideline is restricted to the development of medicinal products for the treatment of
90 patients with CHF including those in the post-acute phase of heart failure.

91 This guideline is intended to assist applicants during the development phase and for guidance only.
92 Any deviation from the guideline should be explained and discussed in the application.

93 **3. Legal basis and relevant guidelines**

94 This guideline has to be read in conjunction with the introduction and general principles (4) and part I
95 and II of the Annex I to Directive 2001/83 as amended and other pertinent elements outlined in
96 current and future EU and ICH guidelines, especially those on:

- 97 • *Studies in Support of Special Populations: Geriatrics (ICH topic E7; CHMP/ICH/379/95) and*
98 *related Q&A document (EMA/CHMP/ICH/604661/2009);*
- 99 • *Dose Response Information to Support Drug Registration (CPMP/ICH/378/95; ICHE4);*
- 100 • *Statistical Principles for Clinical Trials (CPMP/ICH/363/96; ICH topic E9);*
- 101 • *Choice of the control group in clinical trials (CPMP/ICH/364/96; ICH topic E10);*
- 102 • *EMA Guideline on clinical development of fixed combination medicinal products*
103 *(CHMP/EWP/240/95 Rev. 1);*
- 104 • *Pharmacokinetic Studies in Man (3CC3A);*
- 105 • *Note for Guidance on the Investigation of Drug Interactions (CPMP/EWP/560/95);*
- 106 • *Guideline on clinical investigation of medicinal products for the treatment of acute heart failure*
107 *(CHMP/EWP/2986/03 Rev. 1);*
- 108 • *Guideline on the choice of the Non-inferiority margin (EMA/CPMP/EWP/2158/99);*
- 109 • *Points to Consider on Switching between Superiority and Non-inferiority (CPMP/EWP/482/99);*
- 110 • *Points to consider on an Application with 1) Meta-analyses 2) One pivotal study*
111 *(CPMP/EWP/2330/99);*
- 112 • *Reflection paper on assessment of cardiovascular risk of medicinal products for the treatment*
113 *of cardiovascular and metabolic diseases (EMA/50549/2015)*
- 114 • *Ethnic factors in the acceptability of foreign clinical data (ICH E5(R1)) and Reflection paper on*
115 *the extrapolation of results from clinical studies conducted outside the EU to the EU-population*
116 *(EMA/CHMP/EWP/692702/2008) and Q&A to ICH E5 (R1).*

117 **4. Assessment of efficacy**

118 The main therapeutic goals in the treatment of CHF are to improve survival and to prevent
119 deterioration of the clinical status and hospitalisations, and they should represent the primary aim of
120 new agents developed for the treatment of CHF. Improvement in functional capacity may also be a
121 relevant treatment goal in selected patients. The aims of treatment and assessment of endpoints are
122 not different between patients with HFrEF and those with HFpEF. Given that treatments effective in
123 improving prognosis in HFrEF have not shown a similar effect in patients with HFpEF, effects on
124 recurrent hospitalisations and/or on functional capacity may play a larger role in the assessment of
125 efficacy in patient with HFpEF but experience so far is limited and this remains subject to further
126 scientific discussion. The therapeutic effects on symptoms and quality of life are also of great
127 importance to patients with CHF but they are more difficult to measure and have lower reproducibility.
128 Haemodynamic changes (e.g. left ventricular ejection fraction [LVEF], left ventricular remodelling) and
129 biomarkers are considered to provide only supportive data.

130 **4.1. Choice of endpoints**

131 **4.1.1. Mortality**

132 One of the main therapeutic goals in the treatment of CHF is to improve survival. Thus, mortality is to
133 be considered as the primary endpoint either alone or as a component of a composite endpoint in
134 combination with hospitalisation for heart failure (except under special circumstances see 4.1.3)

135 Although overall mortality is the preferred endpoint, cardiovascular mortality, alone or as composite
136 endpoint, can also be considered to be the primary mortality endpoint provided that all-cause mortality
137 is assessed as a secondary endpoint.

138 **4.1.2. Hospitalisation for heart failure**

139 Time to first Heart Failure Hospitalisation (HFH) can be included as part of a primary endpoint or as a
140 secondary endpoint in clinical trials.

141 Endpoints accounting for recurrent HFH events may better characterise the prognosis of patients with
142 chronic heart failure under certain conditions, in particular when cardiovascular mortality is low and/or
143 number of eligible patients limited. However, analysis and interpretation are complicated by so-called
144 terminal events (i.e. all-cause death, heart transplant, Left Ventricular Assisted Device (LVAD)
145 implant) which limit the total number of HFH per subject, and these 'terminal events' will usually need
146 to be addressed explicitly in the statistical analysis since certain naïve approaches to the analysis of
147 hospitalisation rate data will not reflect the true effect of the investigational agent. Because of limited
148 experience with such endpoints in drug development and licensing, it is strongly recommended to seek
149 Scientific Advice, when recurrent HFH is to be used as a part of a primary endpoint (see 5.2).

150 In addition, patients are often managed for episodes of transient decompensation or worsening heart
151 failure (WHF) in outpatient settings (e.g. emergency departments, observation units, other outpatient
152 settings)(7). The capture of events of WHF without hospitalisation may be warranted as an additional
153 endpoint.

154 **4.1.3. Functional capacity**

155 Exercise testing allows objective evaluation of functional capacity in patients with CHF and may be
156 relevant to measure as secondary endpoint under certain conditions, e.g. patients with HFpEF.(8) In
157 selected patient populations with an unmet medical need (e.g. patients with cachexia or frail or
158 elderly) the effect of the treatment on exercise capacity may be considered as a primary endpoint
159 provided it is accompanied by an improvement in patient related outcome and that the cardiovascular
160 safety profile is adequately characterised (see also 7.5 and 8.1). Further confirmation with morbidity
161 and mortality data after registration may be required. Also, the clinical relevance of the change in
162 exercise capacity with the treatment needs to be defined clearly.

163 **4.1.4. Patient reported outcomes**

164 Patient reported outcomes (PROs) may include improvement of symptoms (NYHA classification) and
165 quality of life (QoL). Improvement of symptoms must be clinically important in magnitude, consistently
166 achievable and sustained over an extended duration of treatment.

167 PROs can be used as secondary endpoints in CHF studies and should be considered as supportive. In
168 patients with advanced disease and/or severe co-morbidities (end stage CHF, CHF with cachexia)

169 where there is a need for palliative care, PRO may be relevant in support of the effect on exercise
170 capacity.

171 **4.1.5. Haemodynamic parameters**

172 Although worsening in some haemodynamic parameters (left ventricular function, cardiac index) are
173 associated with poor prognosis the correlation between improvement of haemodynamic parameters
174 with prognosis and/or symptoms has not been adequately established. Changes in haemodynamic
175 parameters may be useful to elucidate the mode of action and the required dose of a therapeutic agent
176 in early phase studies but cannot be used as primary endpoint in a pivotal trial.

177 **4.1.6. Biomarkers**

178 Although several biomarkers (neuroendocrine, renal, and cardiac) have been shown to be independent
179 predictors of outcome in patients with CHF, none has been shown to be a reliable surrogate for clinical
180 outcomes in patients with HF. To this end biomarkers cannot be included as primary endpoints in
181 phase III clinical trials in CHF. Biomarkers, in particular BNP, NT-proBNP, MR-proANP or pro-
182 enkephalin, procalcitonin may be used to better identify patients with CHF and subsets of patients
183 likely to benefit from specific interventions.

184 **4.1.7. Events from implantable devices**

185 Implantable cardioverter devices (ICDs) improve survival in patients with CHF and may be used to
186 record episodes of life-threatening arrhythmia/ventricular fibrillation (see also 8.4). If the ventricular
187 fibrillation or ventricular tachycardia leads to a discharge/therapy from the device, the event may be
188 used as a measure of efficacy. Such device interventions could include shocks or anti-tachycardia
189 pacing to overcome sustained VT. It will be necessary to distinguish improper or inappropriate shocks
190 from successful therapies.

191 **4.1.8. Composite endpoints**

192 Composite and hierarchically-ordered endpoints can be applied to CHF studies providing that mortality
193 (overall or cardiovascular) and HFH are the first two hierarchical endpoints, respectively. These
194 endpoints may be followed in order of relevance by measures of functional status (6 Minute Walking
195 Test [6MWT], Maximum Oxygen Uptake [MVO₂]), and PRO. Please refer to the *Concept paper on the
196 need for a guideline on multiplicity issues in clinical trials - draft (EMA/286914/2012)*.

197 **5. Methods to assess efficacy**

198 Efficacy variables may be influenced by changes in concomitant background medications. Therefore, if
199 possible, every effort should be made during the conduct of a study in patients with CHF to maintain
200 stable background therapy throughout the study. The influences of background treatment
201 modifications on efficacy endpoints should be carefully considered and critically scrutinised.

202 **5.1. Survival**

203 Efforts should be made to define the specific mode of cardiac death occurring in the studies (e.g.
204 sudden cardiac death, pump failure, acute coronary events). It is mandatory to report and centrally
205 adjudicate all mortality data in all studies in CHF where survival is an endpoint of the study.

206 Assessment of cardiovascular mortality will commonly result in ‘censoring’ of other “types” of mortality
207 in the analysis(9). A comprehensive interpretation must address the plausibility of an assumption that
208 this censoring is uninformative and discuss results alongside analyses including all-cause mortality.

209 Data should be gathered so as to enable evaluation of the clinical causes of reduction in mortality
210 (such as arrhythmias, stroke, myocardial infarction, non-cardiovascular, etc.).

211 **5.2. Hospitalisation for heart failure (HFH)**

212 Since patients with CHF may be often hospitalized for non-cardiac causes or for reasons unrelated to
213 worsening of CHF, objective evidence of cardiac de-compensation as cause of hospitalisation should be
214 provided. HFH must be defined in the protocol by signs and symptoms of deteriorating clinical
215 conditions along with increased plasma levels of natriuretic peptides as appropriate and the need for
216 acute treatments for CHF (e.g., increase in diuretic dose, intravenous diuretics, or intravenous
217 vasodilators/inotropes).

218 HFH needs to be centrally adjudicated. Also, hospitalisation for cardiovascular causes but not primarily
219 due to CHF must be noted and adjudicated. Efforts must be put in place to differentiate hospitalisations
220 due to heart failure from those due to extra-cardiovascular causes (e.g. COPD).

221 Other cardiovascular events (e.g. new myocardial infarction or stroke) may be responsible for
222 therapeutic interventions in patients with CHF. Therefore, the reasons for a change in the background
223 therapy should always be carefully recorded and the criteria for these events must be pre-specified in
224 the protocol. A blinded review by an independent adjudicating committee is recommended.

225 As described in 4.1.2, quantifying recurrent HFH events may better characterise the effect of treatment
226 in some circumstances, but experience with this type of endpoint is limited(4). An applicant may seek
227 Scientific Advice should include a discussion on the ways in which recurrent hospitalisations may be
228 characterised and aspects of trial planning in respect of sample size, duration of follow-up and effect
229 size(s) (considering the effect of treatment on HFH rate and the rate of terminal events) that can be
230 regarded as being of clinical importance, in addition to the approach to statistical analysis.

231 Patients should be followed for events of interest regardless of adherence to randomized treatment,
232 with all events included in the primary analysis unless otherwise justified.

233 Further, the threshold for hospitalisation is highly variable across (and within) regions of the world
234 which may affect the interpretability and applicability of study results to the European population. This
235 should be taken into account when planning the studies, e.g. by implementation of similar criteria for
236 hospitalisation and stratification by regions.

237 Patients should be followed for events of interest regardless of adherence to randomized treatment,
238 with all events included in the primary analysis unless otherwise justified.

239 In order to define an episode of de-compensation in the outpatient settings it is required to
240 demonstrate a cardiac cause for the worsening of symptoms using the same definitions as for HFH.

241 **5.3. Functional status**

242 Measurements of maximal oxygen consumption during bicycle or treadmill exercise (MVO₂) and of
243 supervised 6MWT are both reliable methods for the assessment of functional capacity. Other functional
244 tests, such as stair climb test, Short Physical Performance Battery (SPPB) or hand-grip strength
245 assessment, may be more appropriate in selected populations (elderly, frail, cachexia, etc.).

246 Exercise testing should be performed using appropriate protocols specifically designed for the
247 functional assessment of patients with CHF (5). Sub-maximal exercise protocols should specify a priori
248 the reasons for termination of the tests. Patients naïve to exercise protocols (bicycle, treadmill,
249 measurement of oxygen consumption) should first be made familiar with the technique before they are
250 included in the trial. Repeated baseline and repeated follow-up testing may reduce variability of the
251 results and increase statistical power.

252 **5.4. Haemodynamic studies and studies of left ventricular function**

253 A variety of techniques are available for both non-invasive and invasive measurements of
254 cardiovascular haemodynamics and left ventricular function that may include ventricular dimensions,
255 ejection fraction and indices of systolic and diastolic functions (e.g. Left ventricular end diastolic
256 pressure [LVEDP]).

257 The use of newer techniques used to study the haemodynamic effect of a new agent in CHF must be
258 validated beforehand and justified. Non-invasive techniques including echocardiography, Doppler
259 studies, radio-isotope ventriculography and cardiac magnetic resonance imaging have been proven to
260 be objective and quantifiable. Some of these techniques show inter-operator variability. Measurement
261 of LVEF by an isotopic method and/or by cardiac magnetic resonance imaging and/or echocardiography
262 is desirable to quantify the degree of systolic ventricular dysfunction and its response to treatment.
263 They are also useful in defining patient subgroups (e.g. HFrEF versus HFpEF). Given the inter-operator
264 variability, the investigators from each centre should specify the norms for their laboratory and the
265 inter as well as intra-operator variability. Variability can be reduced by core laboratory analyses.

266 **5.5. Patient reported outcomes**

267 **5.5.1. Clinical Symptoms**

268 Several symptoms scores or global or disease-specific assessments can be used to assess the effect of
269 a new pharmacological agent on clinical symptoms. The most commonly used classification system for
270 the assessment of symptoms in patients with CHF is the New York Heart Association (NYHA)
271 classification. Other scales or scores can be used for the assessment of symptoms provided that they
272 are validated in the populations (and in the languages) in which they are being tested. Whatever scale
273 is used, it must be capable of providing robust evidence of symptomatic improvement. However, NYHA
274 class as an established standard should be documented to allow comparisons across trials.

275 **5.5.2. Quality of Life (QoL)**

276 Several QoL questionnaires can be used for the assessment of the treatment effect in patients with
277 CHF. Questionnaires must be fully validated for the disease. In order to be considered, questionnaires
278 must be translated and validated in all the languages spoken in the countries of patients included in
279 the clinical studies.

280 **6. Selection of patients**

281 **6.1. Study population**

282 Patients with CHF can be defined as those with an abnormality of cardiac structure or function leading
283 to failure of the heart to deliver blood at a rate commensurate with the metabolic requirements.
284 Patients to be included in clinical trials will have to be diagnosed with CHF according to the current
285 *ESC/HFA Guidelines for the diagnosis and treatment of acute and chronic heart failure* (1). Attention

286 should be given to the representativeness of the study population, patients included in the trials must
287 represent the real life population. A relevant number of patients over 75 years of age must be
288 included.

289 Patients with CHF must be differentiated according to the degree of left ventricular function (LVEF)
290 between those with reduced (LVEF <40%) and those with preserved ejection fraction (LVEF >40%)
291 (HF_rEF and HF_pEF respectively). Patients with HF_pEF may be further differentiated between those with
292 a moderately reduced (LVEF 40-50%) or largely preserved ejection fraction (LVEF >50%)(1). EF
293 should be defined before inclusion in the study. Studies can be conducted in a large population
294 encompassing all types of heart failure or they can be limited to one or two subgroups.

295 Patients hospitalised because of an acute episode of de-compensation who are stabilized by standard
296 therapy and are not receiving parenteral treatments but remain hospitalised are defined as patients
297 hospitalised for heart failure (HFH); these patients can be included in studies to assess the effect of
298 chronic therapies that are started during the hospitalisation, at discharge or during the 30 days after
299 hospital discharge.

300 The pathophysiology of CHF studied should be defined in terms of aetiology as much as possible (i.e.
301 ischaemic, hypertensive, iatrogenic, diabetic etc.). Patients entering phase IIb and III clinical trials
302 with agents for the treatment of heart failure (NYHA class II-IV) should be treated at study entry as
303 per clinical practice guidelines (1). Given the worldwide variability in therapeutic practices a sizeable
304 number of patients included in clinical trials should be representative for the European population with
305 regards to their background treatment and standard of care.

306 In some trials it may be necessary to “enrich” the number of events by further restriction of LVEF or
307 other patient characteristics. This should be discussed further within the context of the external validity
308 for the claimed indication. This also applies to selection on the basis of pre-treatment and tolerance of
309 the drug.

310 **7. Study design**

311 For studies to be conducted in patients with CHF, a period of stability of CHF medications is required
312 before inclusion. In patients with CHF, up-titration of first line therapies should be conducted according
313 to current clinical practice guidelines (1).

314 **7.1. Pharmacodynamics**

315 Pharmacodynamic (PD) studies should include, apart from the evaluation of tolerability, the
316 assessment of duration of action, the effect of the agent on haemodynamic parameters (e.g. stroke
317 volume, Pulmonary Capillary Wedge Pressure [PCWP]), heart rate, as well as the effect on impulse
318 formation, conduction and repolarisation (i.e., QT/QTc intervals) and cardiac arrhythmia, neuro-
319 hormonal parameters (e.g. sympathetic nervous system) and renal function.

320 Patients with degrees of CHF ranging from mild to severe need to be studied, depending on the
321 indication claimed. The PD activity of the substance needs to be defined with regard to cardiac
322 contractility, arterial and venous tone, and diastolic/systolic function of the heart. If an effect on
323 cardiac electrophysiology of the investigational agent is proposed for or if it is involved in the beneficial
324 effects of the agent, a potential for pro-arrhythmic effect should be fully explored. Further studies -
325 depending on the mechanism of action of the product - may include assessment of myocardial oxygen
326 consumption, and coronary and regional blood flow.

327 **7.2. Pharmacokinetics**

328 The pharmacokinetic (PK) information required for a new pharmacological agent is stated in detail in
329 the appropriate *Guideline on Pharmacokinetic Studies in Man (3CC3A, page 99-106, Oct 1988)*. The
330 pharmacological activity of the main metabolites should be quantified and studied in detail if they are
331 likely to contribute substantially to the therapeutic or toxic effects. However, it must be taken into
332 account that in patients with CHF drug absorption, distribution, metabolism and excretion as well as its
333 delivery to various tissues may be altered. Therefore, depending on PK additional data should be
334 provided.

335 **7.3. Interactions**

336 Special attention should be devoted to potentially useful or unwanted PK and PD interactions with
337 other drugs that might be used alongside the investigational drug for combined treatment of CHF and
338 its most common co-morbidities.

339 **7.4. Exploratory therapeutic studies**

340 The objectives of these studies will be to determine the appropriate therapeutic range including dose-
341 concentration-response relationship of the new investigational agent and to identify patients who may
342 benefit from the medicinal product. Before starting a pivotal trial, the optimal/appropriate clinical
343 dose(s) to be used must be identified by adequately powered carefully designed dose-response
344 study(ies). Dose ranging studies in CHF should thoroughly assess the lower end of the effective dose
345 range. A parallel, fixed dose, double blind placebo controlled design has proved useful in evaluating
346 new drugs. Dose-response studies should be randomised, placebo-controlled and double-blinded often
347 using at least 3 dosages with a total therapy phase of at least 12 weeks to establish the clinically
348 useful dose-range as well as the optimal dose. The dose schedule selected for pivotal studies must be
349 justified on the basis of the results of the dose-finding studies in the target population. The endpoints
350 in dose-ranging studies should be tailored according to the medicinal product in question and such
351 studies should assess clinical symptoms as well as well validated non-invasive haemodynamic
352 responses. If an appropriate dose schedule cannot be established in these initial studies, it may
353 become necessary to investigate more than one dose in the main therapeutic studies.

354 Based on the information from dose-concentration and concentration-response relationships, dose
355 schedules should be clearly defined for patients with varying degrees of congestive heart failure, renal
356 dysfunction and/or hepatic dysfunction.

357 **7.5. Confirmatory therapeutic studies**

358 Controlled double blind randomised studies are required. One large well controlled trial of adequate
359 statistical power may be sufficient to confirm the efficacy of a new drug - provided it is soundly based
360 and well designed, executed, reported and the results are unequivocal. A control group on placebo is
361 preferable if ethical considerations permit, in particular when it is proposed to indicate the
362 investigational drug as an add-on to an existing therapy.

363 Confirmatory studies using an active control may also be acceptable depending on its place in therapy
364 and the benefit established with the reference therapy. These should be designed to demonstrate the
365 non-inferiority or superiority of the new agent to an active comparator.

366 Every effort should be made to record deaths that occur after the withdrawal of double-blind
367 treatment.

368 Groups should be sufficiently balanced in respect of age, sex, pathology, co-morbidities, state of
369 disease, severity of disease and duration of symptoms. Stratified allocation may sometimes be
370 desirable. Concomitant background treatment should be kept as similar as possible during the study.
371 Background therapy should be given according to current guidelines.

372 At least one controlled study of a minimum duration of 6 months is mandatory to demonstrate efficacy
373 in relation to functional benefit when this is the primary endpoint. In this case sufficient data to
374 characterise the cardiovascular safety profile will be needed before approval (see also section 4.1.3.).

375 **7.6. Studies in special populations**

376 The efficacy studies should include patients reflecting the real life population of patients with CHF.
377 Generally these will mainly include patients with mild to severe CHF. Subgroup analyses for gender,
378 race, age, etc. are desirable in order to demonstrate consistency across groups. Studies in specific
379 subgroups may be conducted. Adequate representation of elderly patients should be ensured.

380 Given the frequent drug-drug interactions and the need of dose re-adjustments in patients with heart
381 failure and important co-morbidities (diabetes mellitus, COPD, renal failure, cachexia and/or
382 sarcopenia, anaemia) additional data may be obtained in these patients. Specific studies are needed
383 when specific information is to be included. Dose schedules should be clearly defined for elderly
384 patients and those with various risk factors.

385 **8. Safety aspects**

386 As treatment of CHF is usually prolonged, long-term data on adverse effects should be provided.

387 All adverse effects occurring during the course of clinical trials should be fully documented. Any groups
388 especially at-risk should be identified. Special efforts should be made to assess potential adverse
389 effects that are characteristics of the class of drug being investigated. Particular attention should be
390 paid to the following specific side effects:

391 **8.1. Cardiovascular safety**

392 If the basis for an approval is morbidity data, mortality data are expected to be available in the
393 database in order to ensure that the cardiovascular safety profile is adequately characterized. Such
394 data could arise either from several trials or alternatively within the pivotal study by the use of all-
395 cause mortality with a well defined and acceptable non-inferiority margin. Interim analyses of pooled
396 trial data can be acceptable to rule out an excess risk at initial submission. In case of interim analyses
397 of pooled data maintenance of investigator blindness should be maintained until completion of the
398 study. Please refer to the *Reflection paper on assessment of cardiovascular risk of medicinal products
399 for the treatment of cardiovascular and metabolic diseases (EMA/50549/2015)* for further clarifications
400 with respect to data needed for the evaluation and quantification of the cardiovascular safety profile at
401 time of licensing.

402 **8.2. Hypotension/bradycardia**

403 These may be either symptomatic or asymptomatic. Special attention should be paid to first-dose
404 phenomenon, hypotension and bradycardia following an increase in dose.

405 **8.3. End-organ consequences (kidney, heart, CNS)**

406 Effect of alterations in regional blood flow in other organ systems, especially the kidney, heart and
407 brain, may be studied. Special emphasis should be put on renal function and electrolyte homeostasis.

408 **8.4. Effect on cardiac rhythm**

409 It is essential to investigate the potential for pro-arrhythmic effects. These investigations should
410 include electrocardiography and continuous ambulatory monitoring which may require to be
411 supplemented by some electrophysiological studies. In patients with implanted devices events
412 recorded by the device are acceptable.

413 **8.5. Pro-ischaemic effects**

414 Drugs used in the treatment of CHF may increase myocardial oxygen consumption. Together with
415 potential hypotensive effects, this may lead to angina pectoris and myocardial infarction. Therefore,
416 the safety data should include details which characterise the potential pro-ischaemic effects of the
417 drug.

418 **Definitions**

419 6MWT= 6 Minute Walking Test

420 CHF= Chronic Heart Failure

421 COPD= Chronic Obstructive Pulmonary Disease

422 CNS= Central Nervous System

423 ESC= European Society of Cardiology

424 EU= European Union

425 FDC= Fixed Dose Combination

426 HFA= Heart Failure Association

427 HFH= Heart Failure Hospitalisation

428 HFrEF= Heart Failure with reduced Ejection Fraction

429 HFpEF= Heart Failure with preserved Ejection Fraction

430 LA= Left Atrium

431 LV= Left Ventricle

432 LVAD= Left Ventricular Assisted Device

433 LVEDP = Left ventricular end diastolic pressure

434 LVEF= Left Ventricular Ejection Fraction

435 MVO₂= Maximum Oxygen Uptake acronym for Cardiopulmonary Exercise Test

436 NYHA= New York Heart Association

437 PCWP= Pulmonary Capillary Wedge Pressure

438 PROBE= Prospective Randomized Open Blinded Endpoint

439 PROs= Patient Related Outcomes

440 QoL= quality of life

441 VF= Ventricular Fibrillation

442 VT= Ventricular Tachycardia

443 **References**

- 444 1. ESC Committee for Practice Guidelines. ESC Guidelines for the diagnosis and treatment of acute and
445 chronic heart failure 2016: The Task Force for the Diagnosis and Treatment of Acute and Chronic Heart
446 Failure 2016 of the European Society of Cardiology. Developed in collaboration with the Heart Failure
447 Association (HFA) of the ESC. In preparation.
- 448 2. Vaduganathan M, Greene SJ, Ambrosy AP, Gheorghiade M, Butler J. The disconnect between phase
449 II and phase III trials of drugs for heart failure. *Nat Rev Cardiol.* 2013;10:85-97.
- 450 3. Collins SP, Pang PS, Fonarow GC, Yancy CW, Bonow RO, Gheorghiade M. Is hospital admission for
451 heart failure really necessary?: the role of the emergency department and observation unit in
452 preventing hospitalisation and rehospitalisation. *J Am Coll Cardiol.* 2013;61:121-6.
- 453 4. Zannad F, Garcia AA, Anker SD, et al. Clinical outcome endpoints in heart failure trials: a European
454 Society of Cardiology Heart Failure Association consensus document. *Eur J Heart Fail.* 2013;15:1082-
455 94.
- 456 5. Pani L, Pecorelli S, Rosano G, et al. Steps forward in regulatory pathways for acute and chronic
457 heart failure. *Eur J Heart Fail.* 2015:3-8.
- 458 6. Butler J, Fonarow GC, Zile MR et al. Developing therapies for heart failure with preserved ejection
459 fraction: current state and future directions. *JACC Heart Fail.* 2014;2:97-112.
- 460 7. Gheorghiade M, Shah AN, Vaduganathan M, Butler J, Bonow RO, Rosano GM, Taylor S, Kupfer S,
461 Misselwitz F, Sharma A, Fonarow GC. Recognizing hospitalized heart failure as an entity and
462 developing new therapies to improve outcomes: academics', clinicians', industry's, regulators', and
463 payers' perspectives. *Heart Fail Clin.* 2013;9:285-90.
- 464 8. Fishbein DP, Hellkamp AS, Mark DB et al. Use of the 6-min walk distance to identify variations in
465 treatment benefits from implantable cardioverter-defibrillator and amiodarone: results from the SCD-
466 HeFT (Sudden Cardiac Death in Heart Failure trial). *J Am Coll Cardiol.* 2014;63:2560-8.
- 467 9. Seltzer JH, Turner JR, Geiger MJ, Rosano G, Mahaffey KW, White WB, Sabol MB, Stockbridge N,
468 Sager PT. Centralized adjudication of cardiovascular endpoints in cardiovascular and noncardiovascular
469 pharmacologic trials: a report from the Cardiac Safety Research Consortium. *Am Heart J.*
470 2015;169:197-204.