

Currently proposed endpoints in PSC: the search for reliable surrogate outcome parameters

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- requirements for endpoints



- recommended endpoints in reflection paper
 - disease modifiers only

Sources



HEPATOLOGY

Official Journal of the American Association for the Study of Liver Diseases



SPECIAL ARTICLE

Surrogate Endpoints for Clinical Trials in Primary Sclerosing Cholangitis: Review and Results From an International PSC Study Group Consensus Process

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REVIEW | HEPATOLOGY, VOL. 68, NO. 3, 2018

Design and Endpoints for Clinical Trials in Primary Sclerosing Cholangitis

Cyriel Y. Ponsioen,¹ Keith D. Lindor,² Ruby Mehta,³ and Lara Dimick-Santos³



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

15 November 2018
EMA/CHMP/299976/2018
Committee for Medicinal Products for Human Use (CHMP)

Reflection paper on regulatory requirements for the development of medicinal products for chronic non-infectious liver diseases (PBC, PSC, NASH).

hierarchy of endpoints

level 1: true clinical efficacy measure

level 2: validated surrogate endpoint 

level 3: non-validated reasonable surrogate endpoint 

level 4: measure of biological activity 

endpoint requirements

level 1: true clinical efficacy measure ✗

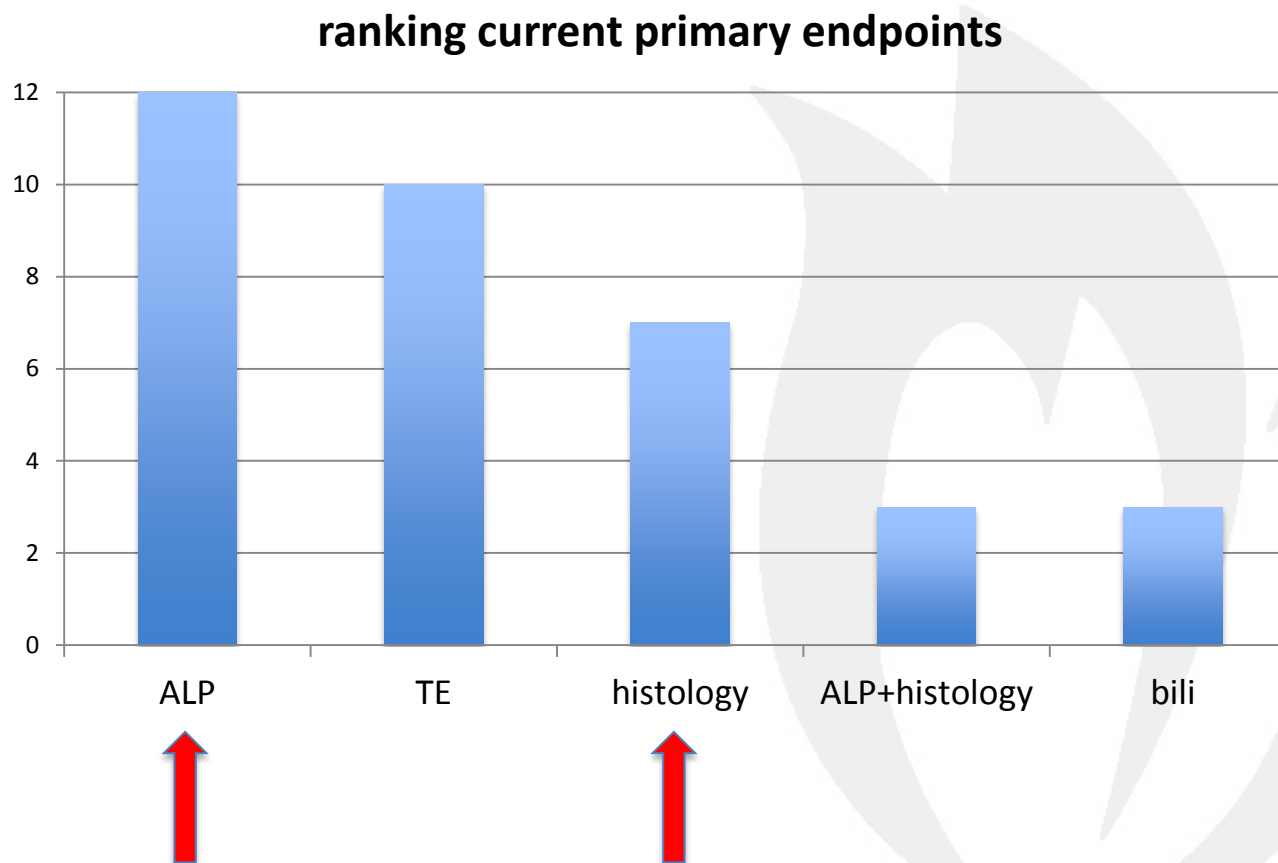
level 2: validated surrogate endpoint ✗

1 st author	year	n	type	month	intervention	endpoints	results
Olsson(7)	1995	84	RCT	36	colchicine vs placebo	1 st : clinical 2 nd : ALP, bili, ALT, albumin symptoms histology	no changes no difference no changes no change
Lindor(8)	1997	105	RCT	24	UDCA vs placebo	1 st : clinical histology 2 nd : ALP, bili, AST	no difference NS improvement*
Olsson(5)	2005	219	RCT	60	UDCA vs placebo	1 st : clinical 2 nd : ALP, ALT, bili	NS NS
Lindor(3)	2009	150	RCT	60	UDCA vs placebo	1 st : clinical 2 nd : ALP, AST, bili histology	worsening* improvement* n.s **
Muir	2017	234	RCT	24	simtuzumab vs placebo	1 st : histology 2 nd : clinical ALP	no change no difference no change

level 3: non-validated reasonable surrogate endpoint ✓ ??

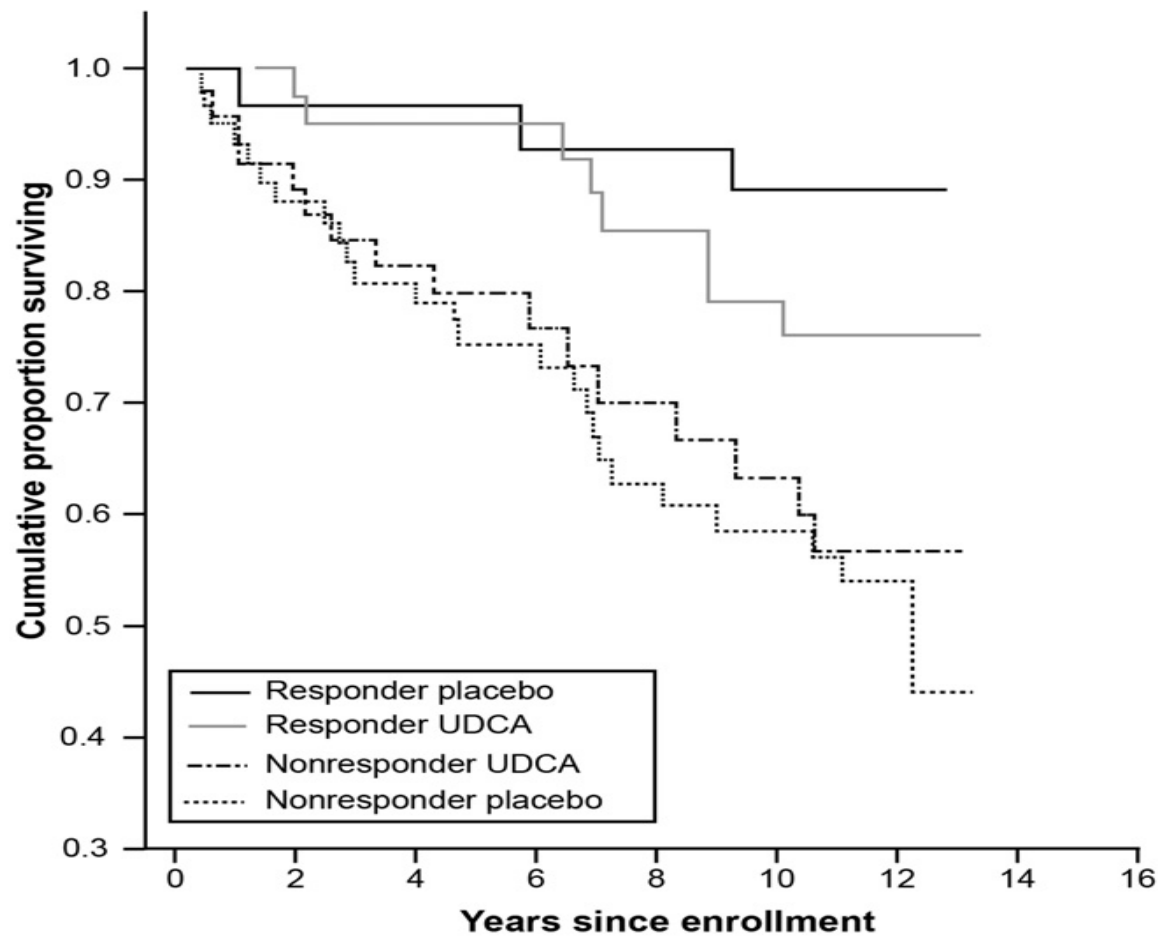
level 4: measure of biological activity ✓

- measurable/interpretable
- sensitive to change
- natural variability contained
- on the pathway to a clinically meaningful endpoint



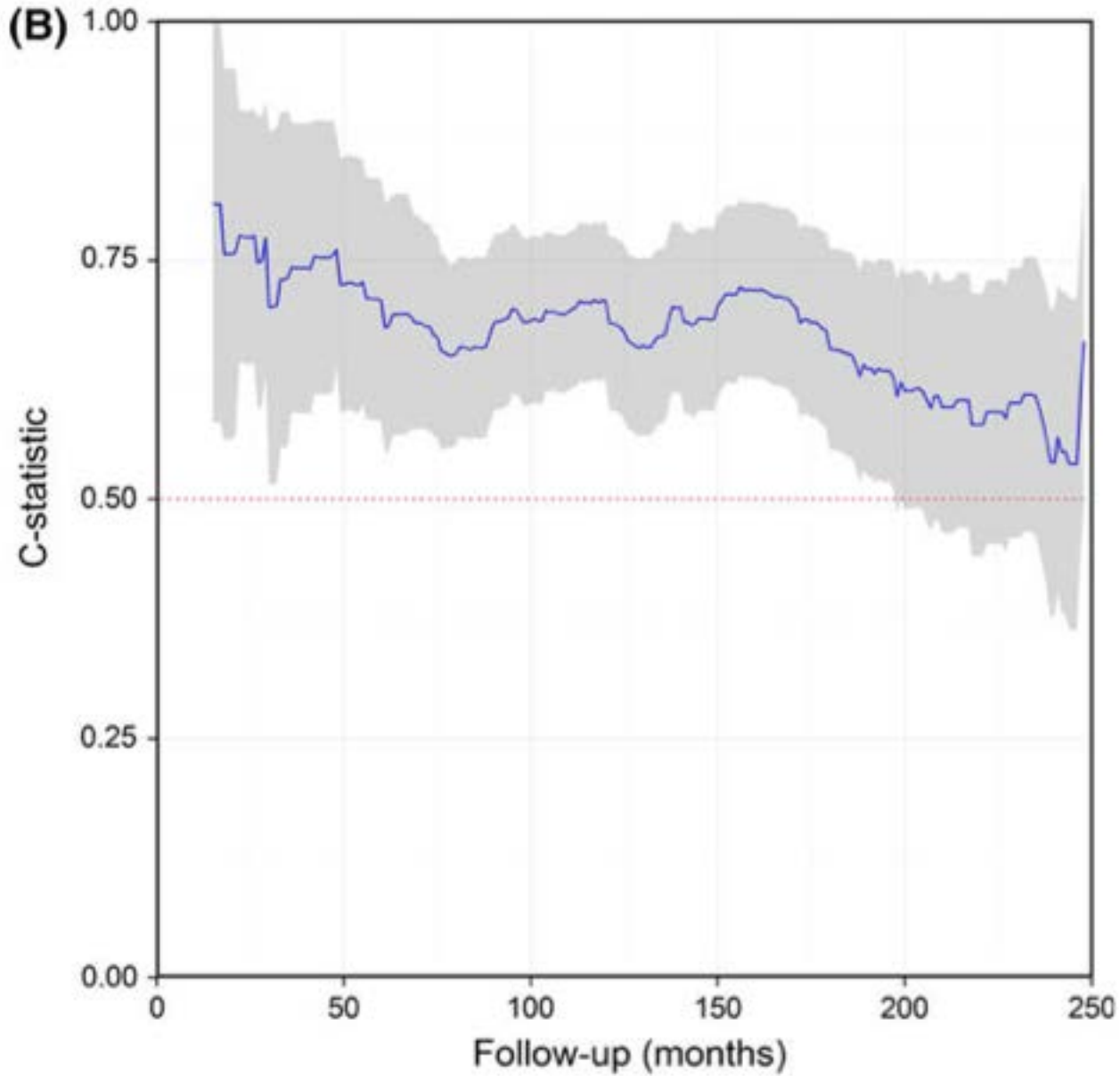
Alkaline Phosphatase

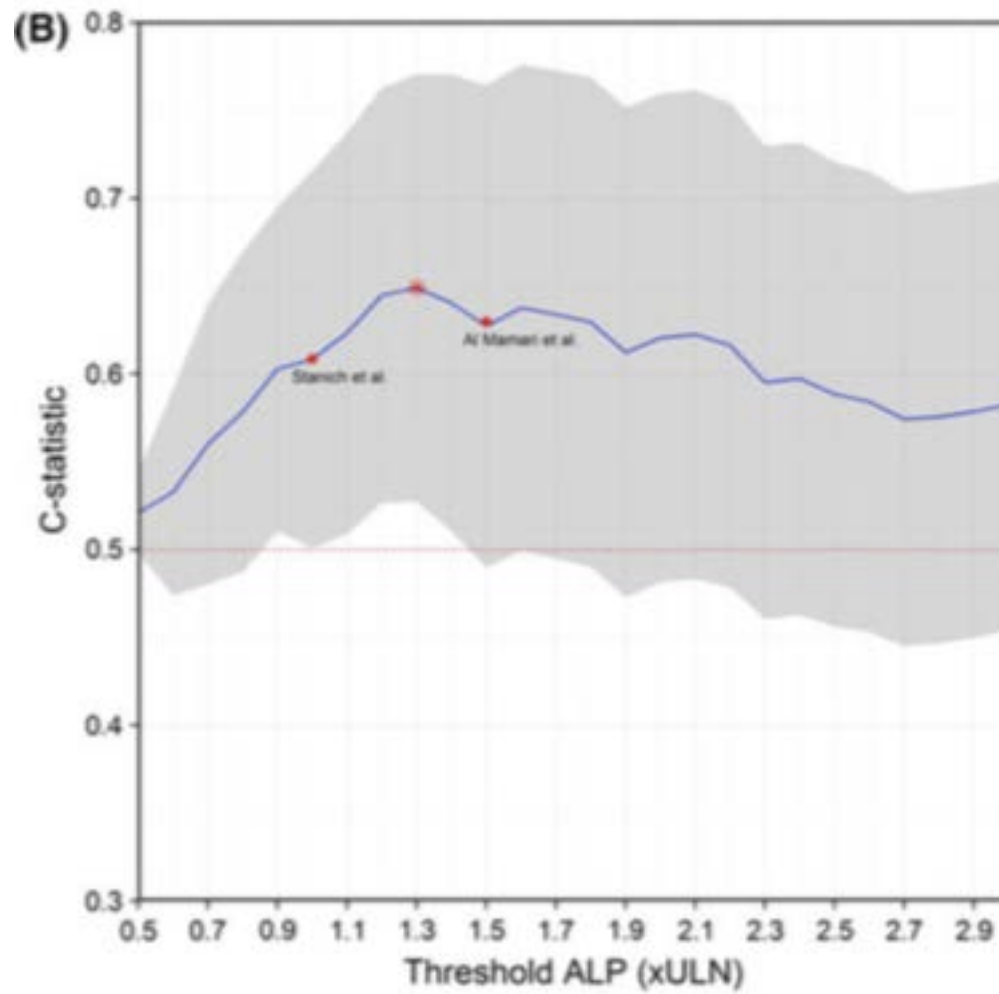
- biochemical hallmark of cholestasis
- used in all studies in past 25 years
- no significant association with clinical outcome observed so far



Years	0	2.5	5	7.5	10
Responder placebo	36	32	29	26	25
Responder UDCA	43	40	38	30	27
Nonresponder UDCA	51	41	33	25	23
Nonresponder placebo	65	51	43	33	31

(B)





(surrogate) endpoints requirements

164 1-year intervals in non advanced PSC patients from Amsterdam and Birmingham potentially eligible for a phase II trial



ALP: mean Δ 1-year intervals = 5.7 % (SD=36%)



variability during natural course limited

Endpoints at Week 96	SIM 75 mg (N = 79)	SIM 125 mg (N = 77)	Placebo (N = 78)	P-value 75 mg vs. placebo	P-value 125 mg vs. placebo
Change in hepatic collagen,¹ %					
Mean (SD)	-0.5 (5.78)	0.5 (6.94)	0.0 (4.76)	0.73	0.33
Median (IQR)	-0.6 (-3.3, 0.7)	-1.1 (-2.8, 1.6)	-0.9 (-2.3, 0.9)		
Ishak Fibrosis Stage,² % (n)					
Worsening	33.8 (26)	32.8 (22)	44.4 (32)	0.12	0.13
Improvement	32.5 (25)	31.3 (21)	22.2 (16)		
Clinical Events,³ % (n)					
All	20.3 (16)	18.2 (14)	17.9 (14)	0.74	0.84
Ascending cholangitis	15.2 (12)	14.3 (11)	9.0 (7)	—	—
Change in ALP,⁴ U/L					
Mean (SD)	-30 (116.0)	-2 (128.6)	-4 (155.5)	0.29	0.94
Median (IQR)	-12 (-98, 16)	-7 (-50, 38)	4 (-25, 42)		

¹Based on mixed-effected models for repeated measures.

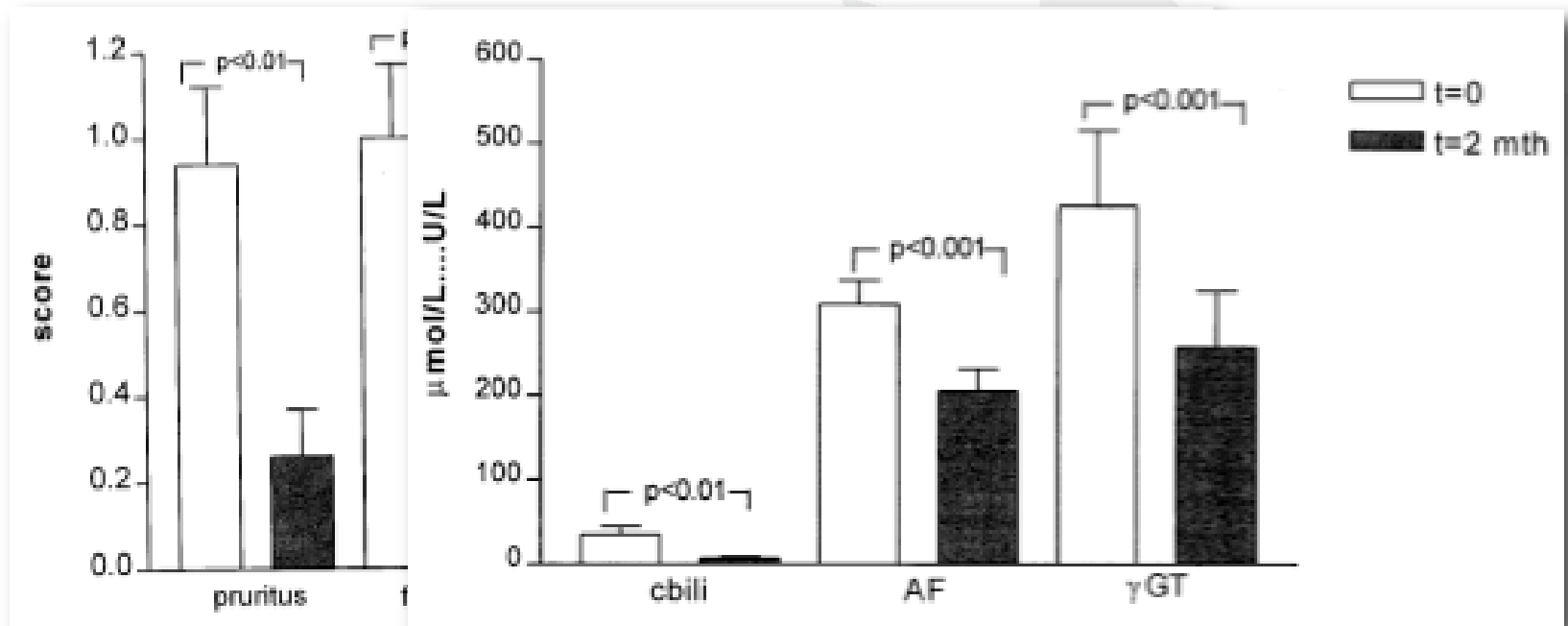
²Based on Cochran-Mantel-Haenszel tests.

³Based on stratified log-rank tests.

⁴Based on t-tests.

- “A Correlate does not a Surrogate Make”
- Criteria for Surrogate Endpoints
 - Measurable/Interpretable
 - Sensitive

short-term stenting: results



IPSCSG statement 2

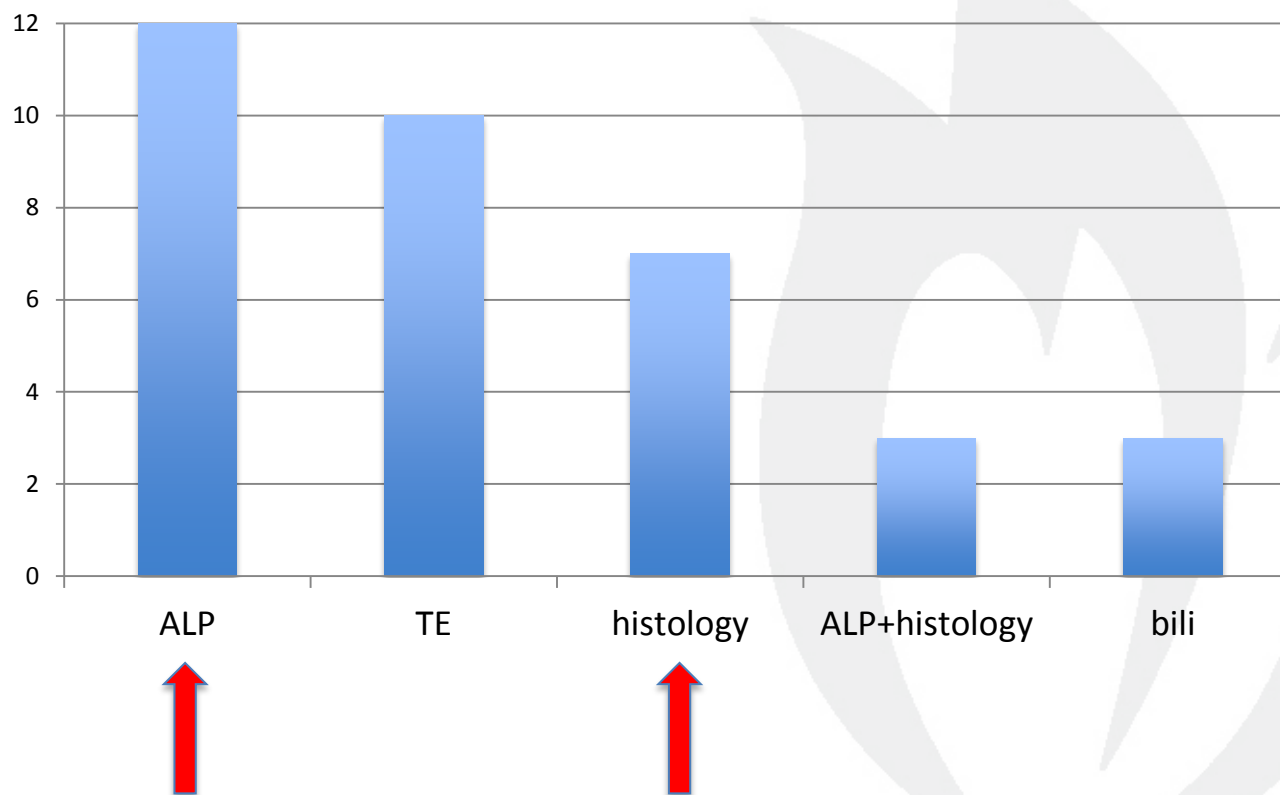
Alkaline phosphatase is widely recognized as a clinical measure of cholestasis. Currently, albeit not formally validated, it is regarded as a potential surrogate outcome parameter [EL 4, RG D].

Grades of Recommendation

A	consistent level 1 studies
B	consistent level 2 or 3 studies or extrapolations from level 1 studies
C	level 4 studies or extrapolations from level 2 or 3 studies
D	level 5 evidence or troublingly inconsistent or inconclusive studies of any level

"Extrapolations" are where data is used in a situation that has potentially clinically important differences than the original study situation.

ranking current primary endpoints



advantages:

- assesses directly disease activity in the target organ (face/construct validity)
- has been gold standard to assess liver fibrosis/cirrhosis
  acceptable to regulatory bodies
- provides human histological material for MOA investigation and safety assessment

disadvantages:

- sampling error *for diagnosis*
- invasive procedure

Interpretable?

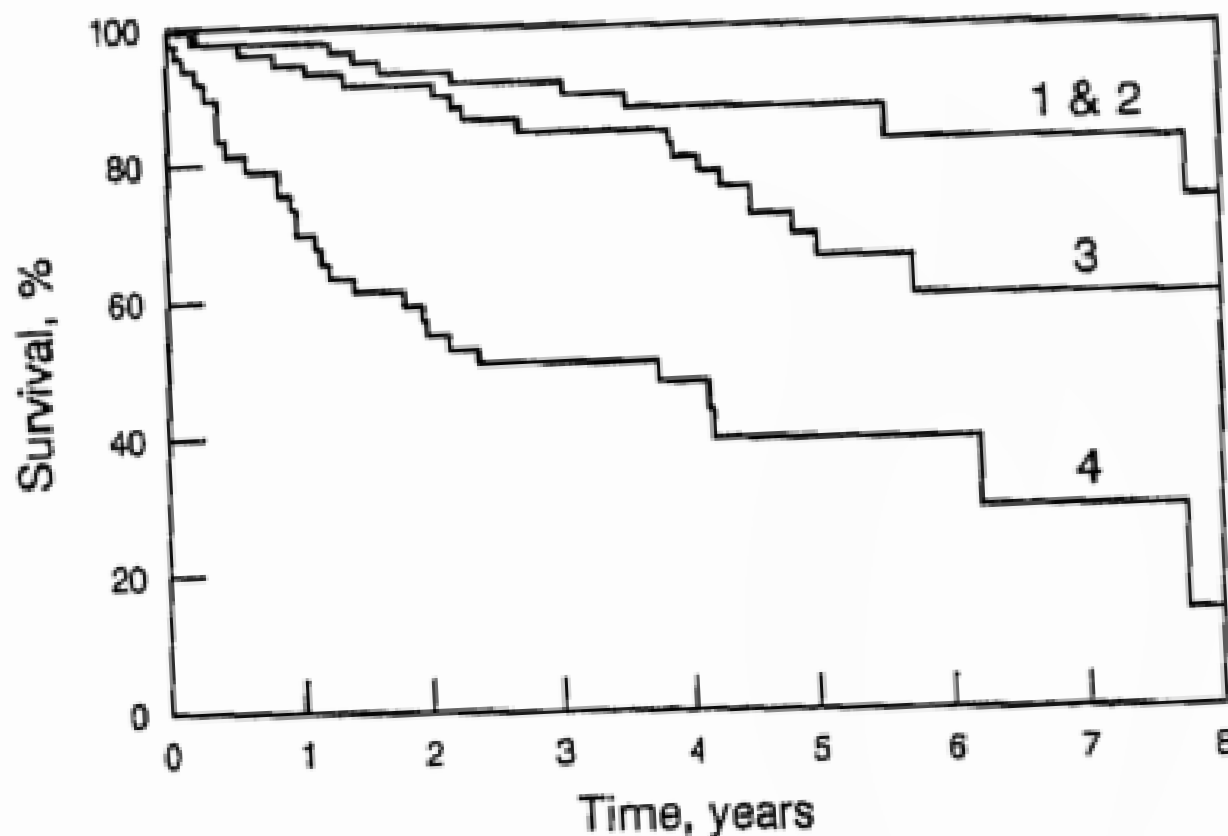
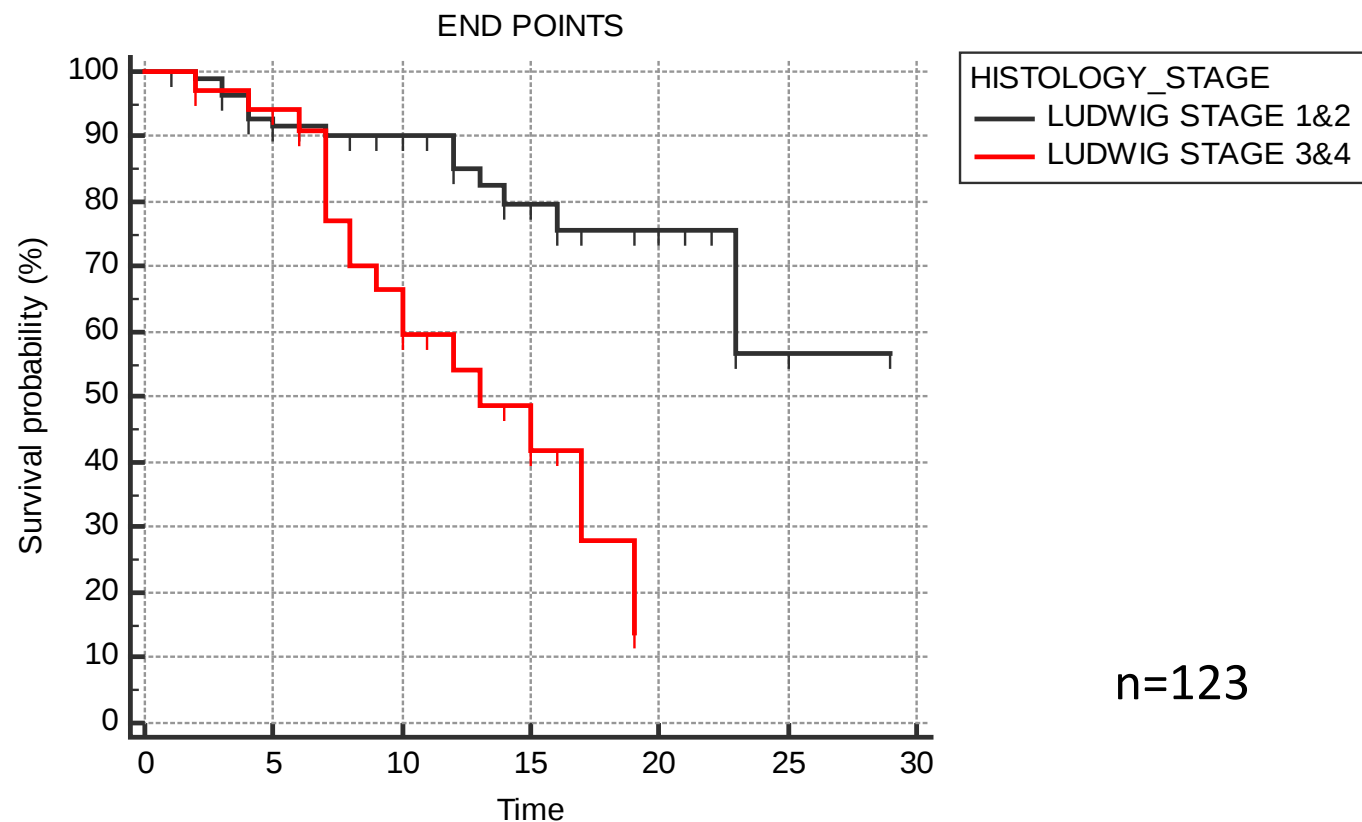


FIG. 2. Kaplan-Meier estimated survival by histologic stage on liver biopsy at study entry.

Interpretable?



Number at risk

Group: LUDWIG STAGE 1&2

87 72 40 20 8 1 0

Group: LUDWIG STAGE 3&4

36 29 12 4 0 0 0

Interpretable?

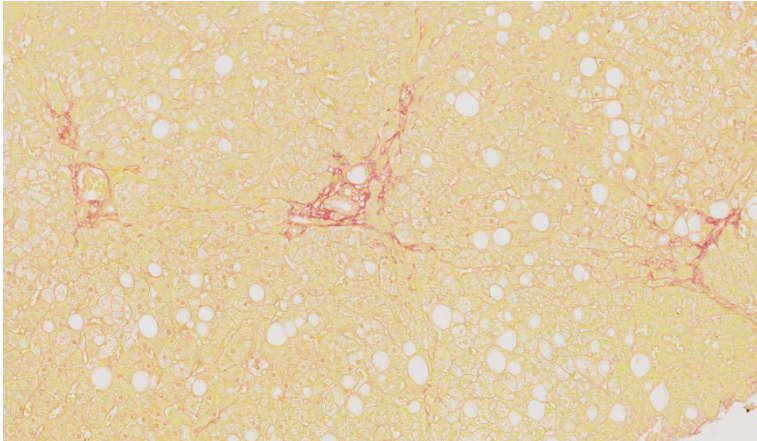
Nakanuma staging vs Ishak vs Ludwig

	transplant-free survival			liver transplant		
	HR	95% CI	p	HR	95%CI	p
Nakanuma stage (1-4)	2.58	(1.66-4.03)	<0.001	3.38	(2.01-5.69)	<0.001
Ishak stage (0-6)	1.37	(1.13-1.65)	0.001	1.58	(1.26-1.98)	<0.001
Ludwig stage (0-4)	2.16	(1.28-3.65)	0.004	3.34	(1.74-6.41)	<0.001

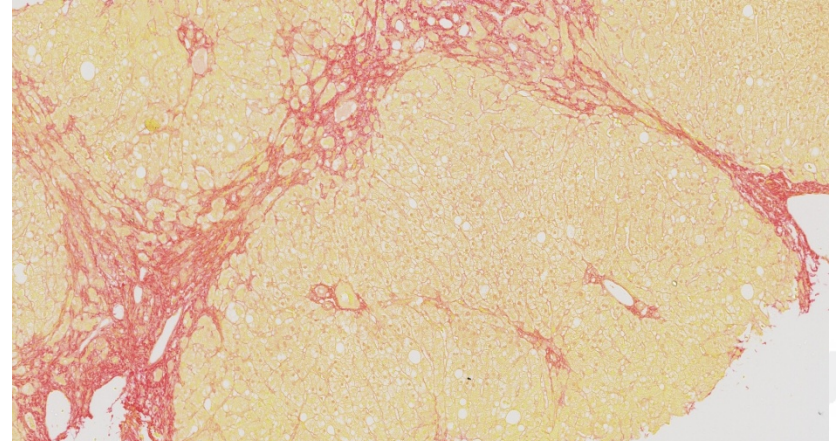
Measurable?

- Interobserver variability kappa's 0.56-0.64
- Six European expert liver pathologists all favoured Nakanuma

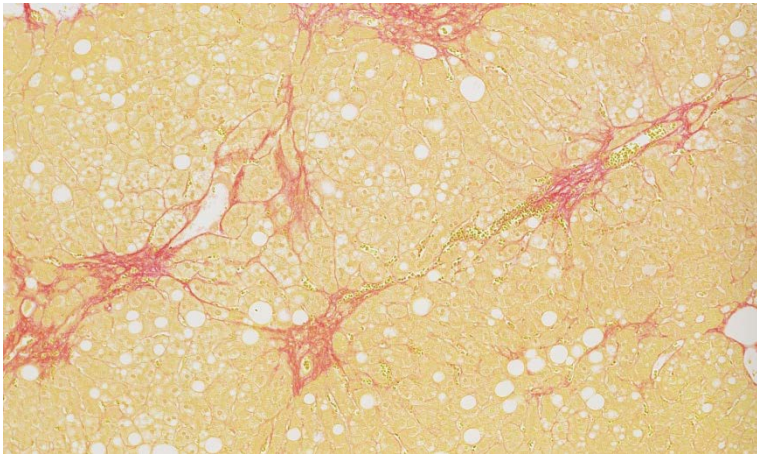
Collagen Proportionate Area (CPA)



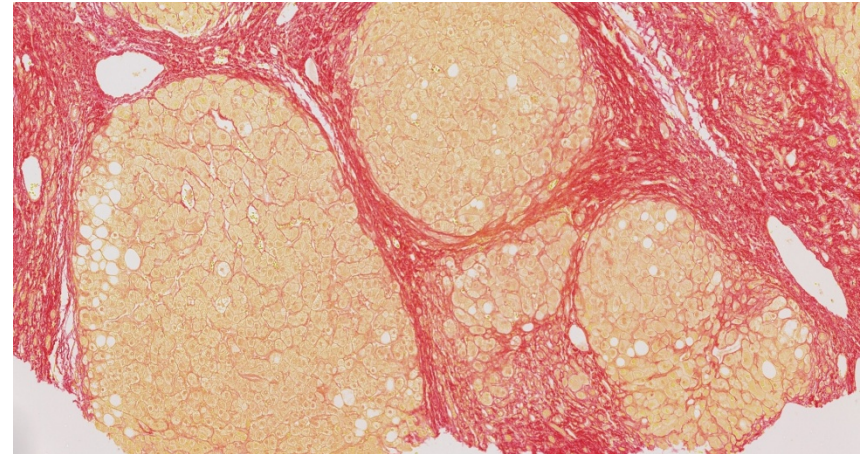
MILD: Ishak 1/2 CPA: 0.17%



SEVERE: Ishak 5 CPA: 11.3%



MODERATE: Ishak 3/4 CPA: 5.7%



VERY SEVERE: Ishak 6 CPA: 31%

natural variability?

Table 1. Observed Transition Between Stages of Disease During the Follow-up

Old Stage	New Stage				Total
	I	II	III	IV	
I	9	2	3	2	16
II	3	15	22	6	46
III	4	10	39	20	73
IV	2	3	8	52	65
Total	18	30	72	80	200

At second biopsy 53% of stage I- III PSC patients had progressed, but 14% of stage III-IV patients now had stage I-II

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sampling variability?

<i>Disagreement (grade)</i>	<i>Total (n = 56)</i>				
	<i>0</i>	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>
Portal lymphocyte infiltration	68	29	3	0	
Portal fibrosis	63	34	2	2	
Periportal fibrosis	71	27	2	0	
Bile duct proliferation	80	14	6	0	
Cholestasis	93	7	0	0	
Steatosis	96	4	0	0	
Stage	73	16	9	2	0

Summary safety of liver biopsy in PSC trials

- No mortality reported in 1851 biopsies in 782 PSC subjects.
- Reported bile leakage in $\pm 0.2\%$

Literature:

- Mortality: 0.09-0.3/1000 in 68,276 resp. 98,445 biopsies^{1,2}
- SAE rate: 0.57% in 2084 Bx (57% under US guidance)³
US guided: 0.5 versus 2.2 % in 836 pts⁴

¹ Piccinino et al. J Hepatol 1986; 2: 165

² Poynard et al. Can J Gas 2000; 14: 543

³ Cadranel et al Hepatology 2000; 32: 477

⁴ Lindor et al . Hepatology 1996; 23: 1079

IPSCSG statement 4

Liver histology has the potential to be a robust surrogate endpoint for clinical trials in PSC [EL2b, RG B].

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ALP + Histology

IPSCSG statement

In the absence of a convincing single surrogate endpoint combining multiple endpoints is considered advisable and should be explored further *[EL 5, RG D]*.

phase

- 1/2A: maximize chance of finding potential contrast:
→ composite
- 2B/3: maximize reassurance of beneficial effect:
→ co-primary

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Thank you

