Clinical Development Strategies and Trial Designs for New TB Treatment Regimens

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EMA Draft Guidance 2016

- Not prescriptive; flexibility in approach encouraged
- Regimen development (multiple drugs developed simultaneously in a regimen) supported
 - In vitro, animal, and early human data can be used to document individual contributions of drugs in regimen
- Indication based on sensitivity to drugs in test regimen
 - "DS-" and "MDR-TB" categories not relevant to novel treatments
 - Not necessary to study "DS-" and "MDR" patients in separate trials
- Showing superiority of single drug addition to SOC for MDR-TB likely no longer viable
 - Optimized background therapy based on DST now has 80% success rate in MDR-TB clinical trials
 - Cf. 85% success rate of HRZE in modern DS-TB clinical trials

Additional Background Considerations

- No one approach or trial design fits all
 - Depends on question, rationale, and development strategy
 - Superior efficacy not the only possible advantage of new drug or regimen
 - Risk : benefit
 - Multiple other highly important advantages possible
 - Proving the exact degree of efficacy may not be of highest importance
- Difficult phase 2 to phase 3 transition in TB
 - Different efficacy endpoints
 - Wide confidence intervals in phase 2
- Phase 3 endpoint really clinical, supported by bacteriology
 - Will need small adjustments for liquid medium



Regimen Development

- Efficacy, safety, risk : benefit
 - Contribution of each individual drug to efficacy assessed in animal studies and in EBA clinical studies
 - Safety issues may require deconvolution
- Impact: optimal method of use of regimen described at launch
 Also efficiency of development pathway
- Cf. single drug addition to (MDR) or substitution in (DS) background regimen
 - Difficult to prove superiority in MDR if "SOC" individualized based on DST
 - Difficult to prove efficacy in DS: effect on non-inferiority margin
 - Optimal method of use of drug not always described at launch

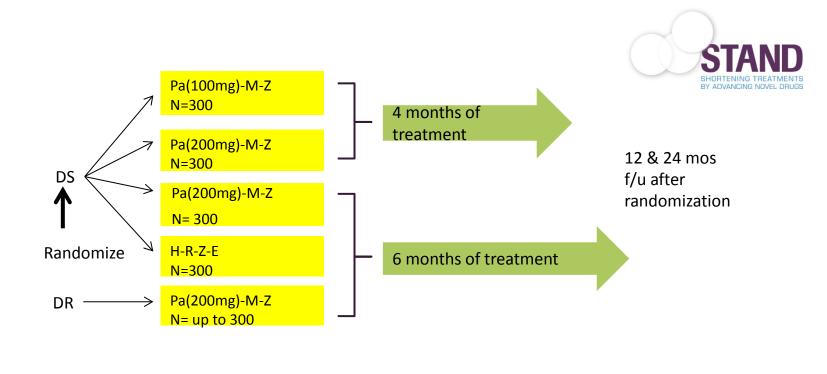


Unified Development Pathway

- DS- and MDR-TB studied together
 - Primary endpoint is in DS patients
 - Vs HRZE control in randomized comparison
 - MDR patients not randomized; assessed for similarity of response to same regimen in DS-TB
- No MDR-TB control group
 - Length, difficulty, expense
- Optimization of impact

STAND - Phase 3 Trial of PaMZ

Participants with newly diagnosed smear positive DS- and MDR-TB



Pa = pretomanid M = moxifloxacin 400 mg Z = pyrazinamide at 1500mg

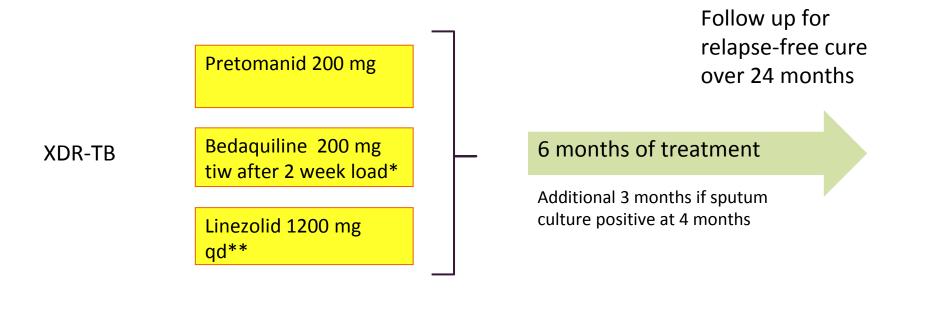


Nix-TB Approach

- Skipping phase 2 in highly select population (XDR-TB)
 - Toxicity of one of the drugs in the regimen restricted the population studied
 - Unmet medical need of this population allowed skipping of phase 2
- Historical control, small numbers
 - Advantage not only efficacy
 - Exact degree of efficacy not the most important aspect of the Nix-TB regimen

Nix-TB Pilot Phase 3 Trial in XDR-TB

Patients with XDR-TB or Who Have Failed MDR-TB Treatment



*May adjust dosing based on NC-005

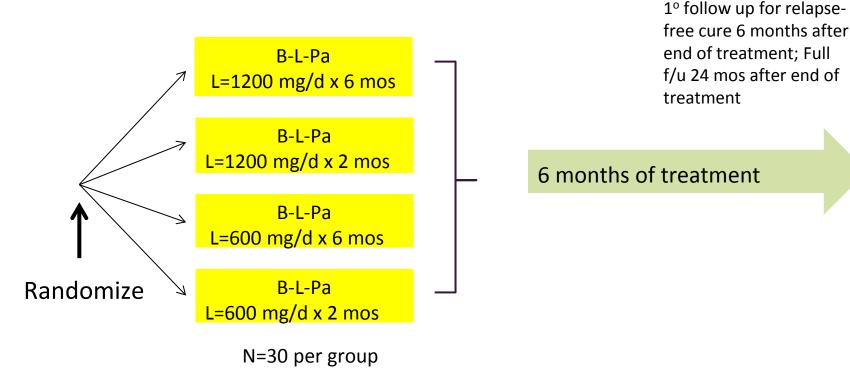
**Just amended from600 mg bid strategy

Sites: Sizwe and Brooklyn Chest, South Africa



B-Pa-L Linezolid Optimization Trial: TB Alliance Study NC-007

Patients with XDR-TB, Pre-XDR-TB or who have failed or are intolerant to MDR-TB Treatment



Pa dose = 200 mg daily; B Dose = 200 mg daily



Conclusions

- No one approach or trial design fits all
 - Depends on question, rationale, and development strategy
 - Superior efficacy (or shorter treatment) not the only possible advantage of new drug or regimen
 - Risk : benefit
 - Multiple other highly important advantages possible
 - Proving the exact degree of efficacy may not be of highest importance
- Regimen development and unified development pathway make sense in many situations
- Nix-TB approach to regimen development made sense when dealing with a fairly toxic compound (linezolid for long-term use)
- Novel approaches will continue to emerge as landscape changes

