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2 EMA/CHMP/SAWP/809208/2011
3 Committee for Medicinal Products for Human Use (CHMP)

4 **Qualification opinion of low hippocampal volume**
5 **(atrophy) by MRI for use in regulatory clinical trials - in**
6 **pre-dementia stage of Alzheimer's disease**
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Agreed by Scientific Advice Working Party	1 September 2011
Adoption by CHMP for release for consultation	22 September 2011
End of consultation (deadline for comments)	1 November 2011

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

10 11 Keywords	Qualification opinion, MRI Biomarker, Pre-dementia Alzheimer's disease
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Background

The European Medicines Agency's (EMA) qualification process is a new, voluntary, scientific pathway leading to either a CHMP opinion or a Scientific Advice of novel methodologies on innovative methods or drug development tools. It includes qualification of biomarkers developed by consortia, networks, public/private partnerships, learned societies or pharmaceutical industry for a specific intended use in pharmaceutical research and development.

The Qualification team was: Prof. Fernando de Andrés Trelles (coordinator), Prof. Luca Pani (CHMP member), Dr Bertil Jonsson. The EMA Scientific Administrator for the procedure was Dr Maria Isaac.

On 23 March 2011 the Applicant C-Path CAMD Biomarker Working Group requested qualification advice for the Candidate Biomarkers of Alzheimer's Disease (AD).

The procedure started during the SAWP meeting held on 26 – 28 April 2011.

The discussion meeting with the Applicant took place on 29 June 2011.

During its meeting held on 30 August - 01 September 2011, the SAWP agreed on the advice to be given to the Applicant. During its meeting held on 19 - 22 September 2011, the CHMP adopted the advice to be given to the Applicant. This advice is annexed to this letter.

The response given by CHMP is based on the questions and supporting documentation submitted by the Applicant, considered in the light of the current state-of-the-art in the relevant scientific fields.

The present opinion addresses the question as to whether the use of baseline measurement of low hippocampal volume (atrophy) by MRI are qualified in selecting (i.e. to categorize) subjects for trials in early Alzheimer's Disease (AD) as having a high probability of being in the prodromal stage of the disease as defined by the Dubois Criteria (2007).

The vast majority of the data used in CHMP's evaluation have been submitted by CAMD, the applicant that requested the qualification, and are all published literature available in the public domain. They have been supplemented by further information searched required by members of the qualification team.

Background information as submitted by the Applicant

Summary from the Critical Path Consortium

One of the challenges of conducting clinical trials for Alzheimer's disease (AD) has been the lack of reliable tools for predicting which subjects with cognitive impairment (but without dementia) will evolve to AD dementia over the course of the trial. The intent of this briefing document is to present data to support the qualification of hippocampal (HC) atrophy, as detected by volumetric magnetic resonance imaging (vMRI), as a biomarker for AD.

Specifically:

It is proposed that baseline measurement of low hippocampal volume (atrophy) by MRI in patients with episodic memory deficit (Dubois criteria) can be used to predict whether such patients are likely to evolve to AD type dementia during the course of an AD clinical trial.

The Dubois research criteria for the diagnosis of AD (Dubois et al., 2007) specify a stepwise approach as follows:

"In the absence of completely specific biomarkers, the clinical diagnosis of AD can still be only probabilistic, even in the case of typical AD. To meet criteria for probable AD, an affected individual must fulfil criterion A (the core clinical criterion) and at least one or more of the supportive biomarker criteria...."

These supportive features include MRI measures:

"Volume loss of hippocampi, entorhinal cortex, amygdala evidenced on MRI with qualitative ratings using visual scoring (referenced to well characterised population with age norms) or quantitative volumetry of regions of interest (referenced to well characterised population with age norms)."

Furthermore, in naming MRI measures to the supportive features, Dubois et al. state:

"Over the past two decades since the NINCDS-ADRDA criteria were published, great progress has been made in identifying the AD-associated structural and molecular changes in the brain and their biochemical footprints. MRI enables detailed visualisation of MTL structures implicated in the core diagnostic feature of AD."

Early stage AD by Dubois criteria which include biomarker criteria above, is named prodromal AD, since the dementia has not appeared. This is the population for this EMA submission's context of use.

Note that the term atrophy, as described above, specifies that a volume loss be compared to well characterized norms. The term atrophy corresponds to that seen pathologically and is measured *in vivo* by the volumetric MRI techniques.

A large body of published literature supports the measurement of hippocampal atrophy as a tool to identify patients in the prodromal stage of AD. The analysis of a systematic literature review conducted by the Coalition Against Major Diseases (CAMD) supporting this use is described herein.

Need for a Qualified Biomarker

Early detection of AD is thought to offer the best opportunity for effective intervention, however this has been problematic. Retrospective assessment of older clinical trials which enrolled subjects defined cognitively as having mild cognitive impairment (MCI) (i.e., without assessing biomarkers) and followed them through to conversion to AD shows that that the rate of conversion was generally not accurately estimated. Trials had to be amended to increase the sample size and/or increase duration of the trial, in some cases up to four years. This high cost, in terms of both time and resources, has delayed beneficial treatments reaching patients in need, and has discouraged clinical development. Diagnostic criteria "pre-Dubois" limited the ability to enroll prodromal AD subjects on a rational basis, i.e., using biomarkers to define and enroll appropriate populations. More reliable and accurate assessment of the likelihood of AD progression during the course of a clinical trial would allow for increased statistical power and could decrease unnecessary exposure to study drug for subjects with a low likelihood of progression.

Application of the AD Biomarker

Baseline measurement of low hippocampal volume (i.e., atrophy) is a supportive indicator of evolution from cognitive impairment to AD dementia, and its use in aiding selection of a clinical cohort will yield a trial population more likely to progress to AD dementia within a practical timeframe, usually about two years. EMA was first in issuing guidelines reflecting this position (CHMP Guidance on AD EMEA/460300, 2008), and defining the biomarker qualification process (CHMP Qualification of novel technologies EMEA/CHMP/SAWP, 2009).

In April 2011, the EMA published a draft qualification opinion of CSF biomarkers EMA Procedure EMEA/H/SAB/012/1/QA/2010. The final paragraph of this qualification states:

"The CSF biomarker signature based on a low A β 1-42 and a high-tau qualifies to identify MCI patients as close as possible to the prodromal stage of AD, Dubois (2007) who are at risk to evolve into AD-dementia. Collection, procedures and measurements of all CSF samples should be done in accordance with Good Laboratory Practices and the specific International standards for these measurements."

The proposed context of use as described in EMA Procedure EMEA/H/SAB/012/1/QA/2010 is similar to that being proposed for hippocampal atrophy, with some distinctions. Based on the CAMD consortium understanding of the presented data, baseline MRI-measured hippocampal atrophy is useful in helping to determine which subjects are likely to evolve to AD dementia. While the data presented do not directly compare HC atrophy on MRI to CSF analyte abnormalities in predicting likelihood to evolve to AD dementia, the data do suggest that the baseline (before any therapeutic intervention is introduced) MRI-measured HC atrophy assists in selecting the subjects likely to progress within a time frame suitable for clinical trials of therapeutics (Jack, 2010). CSF analytes may operate to determine the presence of AD pathology, while the MRI may operate to better define the timing of the evolution to AD dementia (Jack, 2011). Future analyses to determine the relative and/or added value of a combination of vMRI, CSF A β 1-42, and CSF tau measurements to select patients into clinical trials may have merit, but are not the focus of this qualification.

The proposed utility of the baseline MRI measurement of HC atrophy is in subject selection for enrolment in an AD clinical trial. The subject at that juncture will not have been exposed to the investigational therapeutic compound under study, and the biomarker application is therefore not dependent on the mechanism of the investigational compound. As a result, the CAMD members concurred that it is inappropriate to define the use of the biomarker in the context of any single compound or mechanism. Doing so would unnecessarily restrict its application, utility, and generalizability for sponsors developing therapeutics for AD. Further, the data collected and presented here are independent of any investigational intervention. Although the disease modification treatments currently are only in the amyloid/tau mechanism class, future AD trials now need biomarkers based on Dubois criteria.

The data in support of this request for a qualification opinion of the proposed HC atrophy biomarker are derived from an extensive literature search. The literature search focused on subjects who started out with cognitive impairment and progressed to AD dementia. Traditionally, cognitive measures have been used as determinants of likelihood of progression to dementia, usually AD dementia. As the Dubois approach suggests, the addition of a supportive biomarker should increase the accuracy of the prediction of progression from a prodromal AD state to AD dementia. The vast majority of the published study results individually support this position: that, on average, the presence of baseline HC atrophy identified MCI subjects who progressed to AD dementia sooner and more reliably than those without the presence of MRI-measured HC atrophy.

The measurement tools used in the determination of cognitive impairment varied among the studies reviewed. No attempt was made here to catalogue the specific methodologies used across the studies. It is important to note the consistency of the predictive value of MRI-measured HC atrophy as reported in the cited trials despite the varying methodologies.

Literature Search

CAMD with the help of consortium members conducted a systematic literature review with the specific goal of identifying longitudinal studies that evaluated MRI-assessed hippocampal atrophy as a biomarker in predicting conversion to AD dementia from a baseline memory impaired state, either amnesic MCI or MCI determined by criteria outlined in each article. The details of this review are discussed in Section II below, with stepwise methods utilized in the literature review listed in Appendix 1 Study Inclusion Decision Tree.

The CAMD search yielded 27 final accepted studies that are presented in Section II.

Analysis

The accepted studies reported a variety of statistical methods for reaching their conclusions. As discussed below in Section II, the more common outcomes (sensitivity, specificity, hazard ratios, odd ratios, and area under the curve) were not universally presented in the publications. This diversity makes a formal comparison between the studies using meta-analytic techniques impractical.

Six of the accepted studies reported sensitivities and five reported specificities. Reported sensitivity ranged from 50% to 90.9% and specificity ranged from 61.9% to 90%. Hazard ratios (HR) and area under the curve (AUC) are specified as alternative supportive evidence where sensitivity and specificity were not reported. All but two of the included studies (Fellgiebel et al., 2006 and Whitwell et al. 2009) support the context of use.

Studies that presented sensitivity and specificity are listed in Table 1 and are graphically represented in Figure 1. Since the authors do not make it clear how they calculated the sensitivity and specificity, the table can only list the data as the authors presented it (i.e., further interpretation here is not possible). Wang, et al. did not report specificity and, therefore, was not plotted in Figure 1.

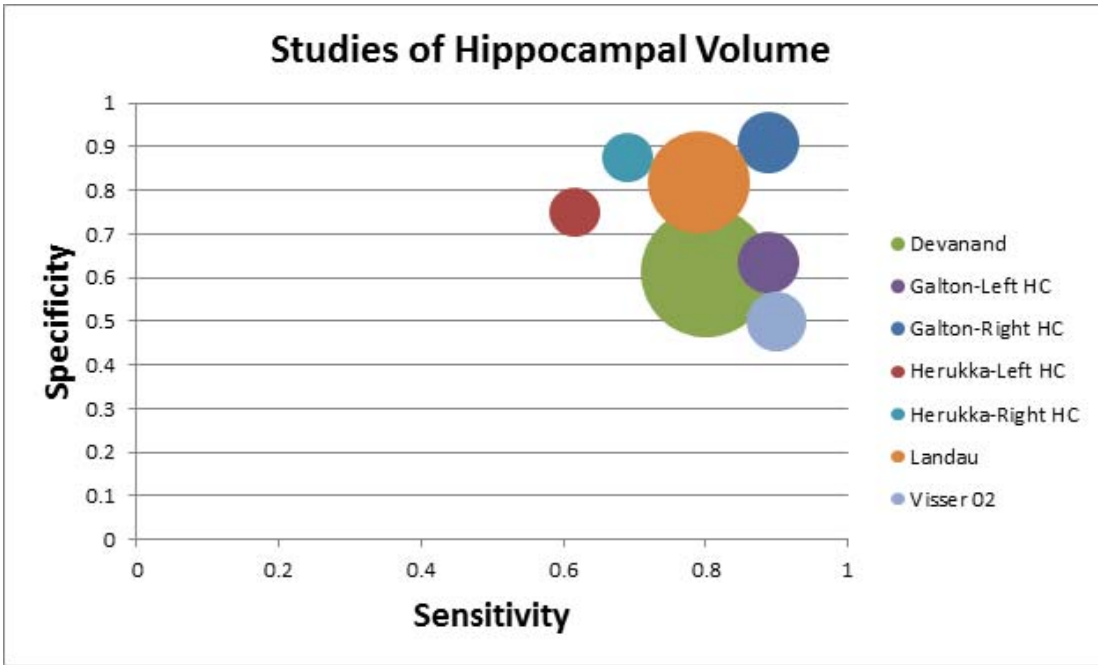
CAMD Conclusion

Based upon this review of the published literature, CAMD has concluded that there is substantial and consistent evidence to support the proposed context of use for the HC atrophy biomarker.

Table 1: Available sensitivity and specificity data from the accepted articles

	Author	Follow-up Months	Sample Size/ No. Converters AD	Sensitivity	Specificity
1	Devanand	36	139/31	61.3%	80%
2	Galton	24	31/11	63.6% L 90.9% R	88.9% L 88.9% R
3	Herukka	40.6 – 57.2	21/8	75.0% L 87.5% R	61.5% L 69.0% R
4	Landau	22.8	85/28	79.0%	82.0%
5	Visser 02	22.6 (12 – 36)	30/7	50.0%	90.0%
6	Wang	21.9 (10.7 – 32.8)	58/19	76.2%	Not reported

Figure 1: Graphic representation of sensitivity and specificity from studies of hippocampal volume.
(Bubble size is proportional to the study sample size.)



Background Information on the Disease to be treated

The lack of widely accepted ante-mortem criteria to identify patients with AD pathology at early symptomatic stages has handicapped sponsors' efforts to develop, and regulatory authority's ability to evaluate, putative disease-modifying drugs. Previous attempts to develop such criteria have lacked the desired diagnostic sensitivity and specificity. For example, amnesic mild cognitive impairment (MCI) (Petersen 2004) describes individuals with clinical characteristics that are likely to represent a high likelihood of progression to AD. However, populations defined in this way exhibit marked differences in the severity of clinical symptomatology, rates of progression to AD dementia, likelihood of progression to AD dementia and level of APO E4 carrier status (Feldman et al., 2007). To know with more certainty which patients with episodic memory impairment would progress to AD dementia is of benefit for predementia trials.

AD is pathologically characterized by the presence of microscopic extracellular neuritic plaques and intracellular neurofibrillary tangles. AD tangle pathology progresses from medial temporal lobe structures, such as the entorhinal cortex and hippocampus, to encompass the whole cortex, whereas plaque pathology is largely cortical and increases with disease severity.

Rationale for Biomarker Selection

The topology of brain atrophy in AD mirrors that of neurofibrillary pathology (Braak, 1991; Whitwell, 2008; Whitwell, 2007). Atrophy begins, and is ultimately most severe, in the medial temporal lobe, particularly the entorhinal cortex and hippocampus. It has been well established histologically that the hippocampus is affected early in the disease with attendant grossly observable atrophy (Braak and Braak, 1991). The sensitivity of volumetric MRI has reached a stage where it can demonstrate even mild AD entorhinal cortex and hippocampus volume reductions of 20–25%, relative to normal age-matched controls, and thereby reflect the observed histopathology of AD (Jack, 1997; Juottonen, 1999; Lehericy, 1994; Bobinski, 2000; Xu, 2000). There is evidence that volumetric MRI methods can provide more sensitive prediction of progression than CSF or cognitive testing alone (Vemuri, 2009).

One of the results of AD pathology is cerebral atrophy, which can be visualized using vMRI (Barnes et al., 2009). Studies show MRI volumetric markers as eligible candidates for predictors of AD from a pre-dementia phase. Rates of change in several volumetric measures, including whole-brain and HC atrophy rates, correlate closely with changes in cognitive performance (Frisoni et al., 2010). In a meta-analysis, medial temporal lobe atrophy is estimated to have 73% sensitivity and 81% specificity for predicting whether patients with amnesic MCI will convert to dementia (Schmand et al., 2010). Structural MRI has gained increasing acceptance in clinical settings as a sensitive and powerful marker of neurodegeneration and cognitive progression (Frisoni et al., 2010).

As volumetric MRI has gained increasing acceptance in clinical settings as a sensitive and powerful marker of neurodegeneration progression (Frisoni et al., 2010), there arises a need to extensively examine the precision of volumetric MRI as a predictor of progression to AD dementia. The following sections of this document tabulate the data, which support the CAMD proposal for HC atrophy as a qualified biomarker for AD.

Section II presents the question on which the sponsor is seeking a qualification opinion and provides the sponsor's position. This section also describes the search and analysis plan for the systematic review of the published literature regarding the performance of HC volume, as measured by vMRI, in predicting progression of cognitively impaired subjects to AD dementia.

Section III presents background evidence on hippocampus pathology in relationship to AD to support the selection of HC atrophy as an appropriate biomarker for this proposed context of use.

Question and CAMD Consortium Position

Question 1

It is proposed that baseline measurement of low hippocampal volume (atrophy) by MRI in patients with episodic memory deficit (Dubois criteria) is a useful means of predicting those likely to evolve to AD dementia during the course of an AD clinical trial.

Does the CHMP agree that the data supports the qualification of HC atrophy, as detected by vMRI in patients with episodic memory deficit, as a biomarker predictive of evolution to AD dementia?

Applicant's position

Through an extensive review of the published literature, CAMD has concluded that there is substantial evidence to support the proposed context of use for an HC atrophy biomarker. In support of the request for qualification of HC atrophy as a biomarker predictive of the evolution to AD dementia, CAMD submits this comprehensive literature review of the data published from worldwide, peer-reviewed, English language, clinical studies, according to the analysis plan described herein. The supporting data are derived from a literature review, encompassing the period from 1 January 1995 through 23 March 2011.

Literature Review

A systematic review was conducted of the published literature of the performance of hippocampal volume, as measured by vMRI, in predicting progression from a memory impaired status to AD dementia. The literature search objectives were: to determine if baseline measurement of low hippocampal volume (atrophy) by MRI in patients with episodic memory deficit (Dubois criteria) or MCI is a useful means of predicting those patients likely to evolve to AD.

Specifically, we have incorporated here the identified literature that reports on the use of MRI-based volumetric measures of hippocampal volume as a predictor of conversion from memory impairment status to AD type dementia.

The specific methodology used to generate the literature review is described in detail under the Methods heading of this document (following the Results below). Overall, the search processes yielded 27 studies that fit the pre-specified search criteria. These are listed in Table 2.

Results: Volumetric MRI in Predicting Progression to AD

The results of the 27 accepted studies are tabulated in Table 2 below. The focus of the accepted studies is the baseline hippocampal atrophy in MCI subjects measured using vMRI with the investigative question regarding the ability of vMRI measurement of HC volume to predict progression to AD. Most studies were published in the last five years. The follow-up duration of all studies ranged from 18 months (Fellgiebel et al., 2006) to 108 months (Desikan et al., 2008).

US studies: 17 studies

Study sample size ranged from 21 (Kantarchi et al., 2005) to 335 subjects (Leung et al., 2010)

European studies: 9 studies

Represented countries included Finland (Herukka et al., 2008; Tapiola et al., 2008), Germany (Fellgiebel et al., 2006), Italy, (Galluzzi et al., 2010), Sweden (Eckerstrom et al., 2008), The Netherlands (Henneman et al., 2009; Visser et al., 1999, 2002), and the United Kingdom (Galton et al., 2005). The study sample size ranged from 13 subjects (Fellgiebel et al., 2006; Visser et al., 1999) to 90 subjects (Galluzzi et al., 2010).

Asian studies: 1 study

262 The study was conducted in Taiwan and included 58 subjects (Wang et al., 2009).
263 The same groups of authors wrote several of these papers and, therefore, there is a possibility that
264 some patients overlap in these studies. The accepted list of studies labels these studies with possible
265 overlapping subjects as "Population overlap".

266 Hippocampal volume measurements were reported with various methods: as a total volume of both
267 hippocampi, or as separate measurements for left and right hippocampi. These data are presented in
268 Table 2 without adjustment.

269 While several studies reported hippocampal atrophy rates for subjects who did and did not progress to
270 AD (Desikan et al., 2008; Jack et al., 2000, 2008; Leung et al., 2010; Stoub et al., 2010; Wang et al.,
271 2009) these studies are outside the specific context of use. The context of use specifies that the MRI
272 based hippocampal volume be measured at a single time point (baseline), appropriate for subject
273 inclusion into a clinical trial. Measuring a rate requires a separate MRI and its hippocampal
274 measurement at two different time points and, therefore, is outside the context of use.

275

276 **Study Results: Hazard Ratios, Sensitivity, and Specificity of vMRI** 277 **Biomarkers**

278 Of the accepted studies evaluating HC atrophy in predicting progression to AD, 19 reported
279 proportional hazards or measurements of diagnostic accuracy in predicting conversion to AD (Table 2).

280 Cox proportional hazard models revealed that subjects who converted to AD during the trial had lower
281 hippocampal volume (atrophy) at baseline than those who remained stable. The results were
282 significant (at a $p=0.05$) in those with MCI at baseline.

283 Six of the accepted studies reported sensitivities and five reported specificities. Reported sensitivity
284 ranged from 50% to 90.9% and specificity ranged from 61.9% to 90%. Hazard ratios and AUC are
285 specified as alternative supportive evidence where sensitivity and specificity were not otherwise
286 reported.

287 All but two of the included studies supported the context of use. The findings from these supportive
288 studies show significantly smaller baseline hippocampal volumes for AD converters as compared to
289 nonconverters (Convit et al., 2000; Devanand et al., 2007; Eckerstrom et al., 2008; Herukka et al.,
290 2008; Jack et al., 2000, 2010; Kantarci et al., 2005; Killiany et al., 2002; Landau et al., 2010; Leung
291 et al., 2010; Stoub et al., 2010; Tapiola et al., 2008; Visser et al., 1999) (Table 2).

292 These results were consistent across all studies except two (Fellgiebel et al., 2006 and Whitwell et al.,
293 2009), in which no significant difference in baseline hippocampal volume was detected between AD
294 converters and stable subjects (Table 2).

295 The Fellgiebel study was a small study with only 13 subjects, and is likely too small to be able to draw
296 any meaningful conclusions. The Whitwell study suggested some patients in the stable MCI cohort,
297 despite a minimum three year follow-up, might have been in a prodromal stage of AD and hence
298 exhibiting a smaller hippocampal baseline. Despite the lack of distinguishing HC atrophy, Whitwell
299 found a number of statistically significant losses in grey matter structures other than the hippocampus.

300 At least two of the 19 studies reporting a statistically significant result also reported that the
301 association was no longer significant after adjustment for age, sex, and intracranial volume (Jack
302 2005, Killiany 2002), though many studies reported robust effect sizes and statistical significance
303 despite several adjustments.

304 Table 2: Longitudinal Studies of Hippocampal Atrophy and Progression to Alzheimer's Disease: HRs, Sensitivity, Specificity, and AUC

Study	Follow-up (Range), Months	Type of Subjects	Sample Size	N Converting to AD	N Stable MCI	Comparison	HR, OR (95% CI)	P value	Sensitivity (95% CI)	Specificity (95% CI)	AUC (95% CI)	Summary
Bakkou r A 2009	32.4	Questionable AD (QAD, CDR=0.5)	49	20	29	QAD-AD vs. QAD			83%	50%	0.65	Entorhinal volume was a better predictor than vHC and other brain regions for predicting progression to AD.
Convit, A 2000	38.4	Normal or MCI	46	14	32							Baseline measures of HC showed declining subjects had 11.3% of reduction in HC compared to non-decliners.
Desika n RS 2009	60	MCI	129	44	85	MCI-S vs. MCI-AD	Crude HR: 0.64 (0.47-0.87) Adjusted HR: 0.73 (0.51-1.04)	0.005 0.08				Automated MRI measurement of the HC volume is a statistically significant predictor of progression from MCI to AD.
Desika n RS 2008	108	MCI	47	25	22							HC and other brain regions had greater rates of atrophy for converters vs. nonconverters using post hoc comparisons.
Devana nd DP 2007	36	MCI	139	31	102	MCI-AD vs. MCI-S	3.62 (1.93-6.80) 2.89	<0.001 0.019	61.3%	80% (fixed)	0.77	In the total subject sample, Cox proportional hazards models, age-stratified, with intracranial volume as

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Study	Follow-up (Range), Months	Type of Subjects	Sample Size	N Conver- ting to AD	N Stable MCI	Compari- son	HR, OR (95% CI)	P value	Sensitivi- ty (95% CI)	Specificali- ty (95% CI)	AUC (95% CI)	Summary
							(1.52- 5.51)					covariate, showed smaller volumes of the HC (risk ratio [RR] per 1 mL volume reduction = 3.62, 95% CI 1.93 to 6.80, p<0.0001) was associated with the hazard of conversion to AD.
Eckerstrom C 2008	24	MCI	42	13	21							Total HC, right, and left HC volumes were significantly smaller in AD converters vs. non-converters.
Fellgiebel A 2006	18	aMCI	13	6	7							Baseline HC volumes were not significantly different between stable MCI patients and converters to AD. There was no significant association between reduced HC size and conversion rate in MCI patients.
Fleisher AS 2008	36	aMCI	129	53	76	MCI-S vs. MCI- AD					60.4 % (52- 68.8)	HC and ventricular volumes were associated with progression from amnesic MCI to AD.

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Galluzzi S 2010	24.0 ± 13.9 (SD)	MCI	90	24	51	MCI-NC vs. MCI- AD					AUC 0.73, 95% CI 0.57 – 0.89	MCI-AD showed higher prevalence of MT atrophy relative to MCI-No Conversion (NC): 55 vs. 18%, p = 0.002 on post hoc comparison. All the MCI patients with MT Atrophy converted to AD, but only 48% of those without MT Atrophy (p on log rank test=0.0007. The accuracy of MT atrophy in discriminating MCI-AD from MCI-NC.
Galton CJ 2005	24	Questiona- ble dementia (Memory complaint s yielded CDR 0.5)	31	11	18	Non- convert ers vs. AD- convert ers			Left HC: 63.6% Right HC: 90.9%	Left HC: 88.9% Right HC: 88.9%		AD-converters had a greater HC atrophy compared to non- converters. Both right and left HC scores were significant predictors of outcome between converter and nonconverter groups.
Henne- man WJP 2009	21.6	MCI	44	23	16	MCI-AD vs. MCI- S	HC volume: 7.4 (2.4- 23.0) HC atrophy rate: 3.9	<0.0 5				Regional measures of hippocampal atrophy are the strongest predictors of progression to AD using Cox proportional hazards models.

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(1.6-9.9)												
Herukka SK 2008	40.6- 57.2	MCI	21	8	13	MCI-AD vs. MCI- S	Right HC: 15.8 (1.4- 174.2)		Left HC: 75%; Right HC: 87.5%	Left HC: 61.5%; Right HC: 69%		MCI subjects progressing to AD had lower volumes in all MRI measures compared to subjects with stable MCI.
Jack CR 2010	19	MCI	218	89	129	MCI-S vs. MCI- AD	HR=2.6 (1.8-3.8) 25% vs. 75%	0.00 1				HC atrophy indicates how far along the neurodegenerative path one is, and hence how close to progressing to dementia.
Jack CR 2008	36		131	52	79							Annual percentage changes were greater in subjects who converted to AD than non- converters for each of four brain atrophy rate measures.
Jack CR 2005	22.8	aMCI	72	39	33	MCI-AD vs. MCI- S	HC volume: 1.51 (1.1-2.0) HC APC: 1.13 (0.8-1.5)	0.00 2				Adjusted baseline HC volume and whole brain volumes were significantly associated with conversion from MCI to AD.

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Jack CR 2000	34.8 (24-48)	MCI	43	18	25							Baseline HC volumes of MCI decliners were significantly more atrophic than those who were stable.
Jack CR 1999	32.6	MCI	80	27	53	MCI-S vs. MCI-AD	0.69	0.015				In univariate analyses, HC volume was a statistically significant predictor of the risk of progression to AD.
Kantarcik 2005	36.4	aMCI	21	12	9	MCI-AD vs. MCI-S	2.5 (1.0-6.2)	0.02				Higher HC ADC values (p=0.002) and lower HC W scores (greater atrophy) (p=0.02) in subjects with aMCI at baseline are associated with a higher relative risk of progression to AD.
Killiany RJ 2002	36	Questionable AD (CDR=0.5)	94	21	73	CDR 0.5-AD vs. CDR 0.5	1.5 (1.0-2.31)	<0.05	NS	NS		Subjects showing greatest HC atrophy were 1.5 times more likely to develop AD on follow-up for each quartile of decreasing volume (OR=1.5, CI = 1.0 to 2.31) (x2 = 3.79, p <0.05).
Landau SM 2010	22.8	MCI	85	28	57	MCI-AD vs. MCI-S	2.49 (1.02-5.96)	0.04	79%	82%		Subjects categorized as AD on FDG-PET, HC volume, p-tau181p, ptau181p/A 1-42,

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												AVLT, and, marginally, APOE had a higher risk of converting than non-AD subjects on each measure.
Leung KK 2010	22.8	MCI	335	123	204							Comparison of MCI subgroups (reverters, stable and converters) showed HC volumes were lower and rates higher in converters compared with stable and reverter groups.
Stoub TR 2010	60	aMCI	29	11	18							Subjects with a MCI converting to AD had smaller entorhinal and HC volumes at baseline compared to stable controls.
Tapiola T 2008	34 (10-54)	MCI	60	9	47	MCI-S vs. MCI-AD	Left HC: 0.739 (0.55-1.00) Right HC: 0.668 (0.49-0.91) Total HC:	0.05 <0.01 <0.05				In all MCI subjects, Cox regression analysis showed baseline volumes of the right HC predicted the progression of MCI to dementia during the follow-up. When subjects with non-AD dementia were excluded, the right, left and total HC volumes significantly predicted the progression to

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							0.815 (0.69- 0.97)					AD.
Visser PJ 1999	36	MCI	13	9	4	MCI-S vs. MCI- AD	HC OR=0.21 (0.05- 0.99)	0.02				Memory dysfunction is a better predictor of AD than the volumes of the HC or the parahippocampal gyrus or the medial temporal lobe atrophy score
Visser PJ 2002	22.8 (12-36)	MCI	30	7	23				50%	90%		HC volume at baseline was statistically significantly associated with a diagnosis of AD at follow up. Trend analyses and logistic regression showed that HC volume was a better predictor of outcome than the volume of the parahippocampal gyrus.
Wang PN 2009	21.9 (10.7- 32.8)	aMCI	58	19	39	MCI-AD vs. MCI- S	Left HC volume: HR=0.38 (0.10- 0.88)	0.03	76.2%			HC volume predicted MCI progression to AD.

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

Study	Follow-up (Range), Months	Type of Subjects	Sample Size	N Conver ting to AD	N Stable MCI	Compari son	HR, OR (95% CI)	P value	Sensitivi ty (95% CI)	Specificali ty (95% CI)	AUC (95% CI)	Summary
Whitwe II JL 2008	44	aMCI	63	42	21							HC volume showed no significant differences between the aMCI-Stable group and the aMCI- Progressors group.

AD = Alzheimer's disease; AUC = area under the curve; CDR = clinical dementia rating; CI = confidence interval; HC = hippocampus;

HR = hazard ratio; MCI = mild cognitive impairment; OR = odds ratio

308 Literature Search Methodology

309 The plan for the literature search is described herein. Procedures for this review followed established
310 methods used in the science of systematic review research.

311 The source of data was limited to studies published in English between 1 January 1995 and through 23
312 March 2011. The literature search included both electronic and manual components. The electronic
313 search was performed in MEDLINE (via PubMed) and EMBASE.

314 The search of MEDLINE was conducted using the following search strategy:

315 PubMed Search Strategy

316 Search: ("alzheimer disease"[MeSH Terms] OR "alzheimer disease"[TIAB] OR "alzheimer's
317 disease"[TIAB] OR "alzheimers disease"[TIAB] OR "predementia" OR "pre-dementia" OR "mild
318 cognitive"[TIAB] OR "cognitive impairment"[TIAB] or "cognitive decline"[tiab] OR "age associated
319 memory impairment"[TIAB])

320 Magnetic resonance imaging[MeSH] and ("volume" or "temporal" or "temporal lobe"[mesh] or
321 hippocam* OR "hippocampus"[mesh] OR "limbic" OR "whole brain")

322 Clinical Trial [Publication Type] OR Comparative Study [Publication type] OR "Epidemiologic
323 studies"[mesh] OR "clinical trial" OR "longitudinal study" OR "cohort study" OR "retrospective study"
324 OR "observational study"

325 Editorial[ptyp] OR Letter[ptyp] OR Addresses[ptyp] OR Bibliography[ptyp] OR Biography[ptyp] OR
326 Comment[ptyp] OR Dictionary[ptyp] OR Directory[ptyp] OR Duplicate Publication[ptyp] OR
327 Festschrift[ptyp] OR Interview[ptyp] OR In Vitro[ptyp] OR Legal Cases[ptyp] OR Legislation[ptyp] OR
328 News[ptyp] OR Newspaper Article[ptyp] OR Overall[ptyp] OR Patient Education Handout[ptyp] OR
329 Periodical Index[ptyp] OR review[ptyp] OR case reports[ptyp]

330 PubMed Search Limits: Humans, English, Publication Date from 1 Jan 1995 to 23 March 2011

331 The same search strategy was used to search EMBASE.

332 EMBASE Search Strategy:

333 Search: 'Alzheimer disease'/exp OR 'alzheimer disease' OR 'alzheimers disease' OR 'predementia' OR
334 'pre-dementia' OR 'preclinical alzheimers disease' OR 'mild cognitive' OR 'cognitive impairment' or
335 'cognitive decline' OR 'age associated memory impairment' OR 'cognitive impairment no dementia'

336 'Nuclear magnetic resonance imaging'/exp OR 'magnetic resonance imaging' and ('volume' or
337 'temporal' or 'temporal cortex'/exp or 'temporal lobe'/exp or 'limbic' OR hippocam* or 'hippocampus' or
338 'whole brain' or 'brain size'/exp)

339 'Clinical study'/exp OR 'controlled study'/exp OR 'clinical trial' OR 'longitudinal study' OR 'retrospective
340 study' OR 'cohort study' OR 'observational study'/exp OR 'observational study'

341 ([cochrane review]/lim OR [meta analysis]/lim OR [systematic review]/lim OR [conference
342 abstract]/lim OR [conference paper]/lim OR [conference review]/lim OR [editorial]/lim OR
343 [erratum]/lim OR [letter]/lim OR [note]/lim OR [review]/lim OR [short survey]/lim) OR 'case
344 report'/exp OR 'case study'/exp

345 #1 and #2 and #3 not #4

346 #5 AND [humans]/lim AND [english]/lim AND [1995-2010]/py AND [embase]/lim NOT [medline]/lim

347

348 In addition to searching MEDLINE and EMBASE, a manual search of the reference lists of all accepted
349 studies, as well as the reference lists of recent reviews and meta-analyses, supplemented the above
350 electronic searches to ensure optimal literature identification and retrieval.

351 **Study Selection**

352 Initial study eligibility was determined by 2 reviewers. Abstracts of publications were primarily used,
353 however if needed, full papers were examined. Any study with a definite exclusion criterion was
354 rejected.

355 **Exclusion Criteria**

356 Publications prior to January 1995

357 Studies published only in abstract form

358 Case reports, letters, comments, reviews, editorials, meta-analyses

359 Non-clinical studies

360 Studies that do not report follow-up data of interest

361 Follow-up duration less than 18 months

362 Cross-sectional studies

363 Studies reporting data of interest on brain volumes other than hippocampus

364 Studies evaluating other types of dementia, but not AD or outcomes for AD cohort are not separable

365 Studies not reporting outcomes of interest

366 Studies of exclusively cognitively normal patient populations

367 Hippocampal volume was not specifically measured (e.g., whole brain measures only)

368 If no definite exclusion criterion was identified, then the full paper was retrieved for a full review. If
369 none of the exclusion criteria and all of the pre-specified inclusion criteria were present, the studies
370 were included.

371 **Inclusion Criteria**

372 Longitudinal study with at least 18 months follow-up

373 Study must be conducted in elderly subjects with pre-dementia conditions or MCI.

374 Study must report 1) baseline quantitative data on hippocampal volume for subjects who progressed
375 to AD and those who remained stable; or 2) diagnostic measures (sensitivity, specificity, AUC, etc.) for
376 vMRI volumes in predicting progression from MCI to AD; or 3) HR, OR for MRI hippocampal volume in
377 predicting conversion from MCI to AD.

378 All studies accepted or rejected at screening required the consensus of two independent reviewers.

Data Extraction and Evidence Tables

During screening and extraction, population overlap was identified among certain accepted studies. Population overlap studies were those in which the same patient population, in part or in total, was reported in more than one publication. In these cases, the study with the most complete data was designated as the “primary” study, and the other related papers are designated “population overlap” studies. For analyses purposes, data from only the largest, most recent, or most complete study report was used. Relevant data from earlier and smaller study reports was used if the report included pertinent data not presented in the larger, more recent publication.

For each eligible study, selected data elements of interest were extracted into electronic table shells. Variables of interest included:

First author and publication year

Number of subjects enrolled

Follow-up duration (months)

Number of subjects analyzed in each group (stable MCI, AD-converters)

Number of patients who converted to AD during follow-up

Other statistics representing the association between the hippocampal volume and progression to AD (sensitivity, specificity, likelihood ratios [LR], hazard ratios [HR], relative risks [RR], odds ratios [OR])

One reviewer extracted the data from each study, and a second reviewer independently reviewed each study entry for completeness and accuracy against the original paper. Table 2 summarizes study-level information from each accepted study.

Outcomes of Interest

The primary outcome of interest is the odds ratio for dichotomized baseline vMRI hippocampal volume relative to progression to AD.

Search Yields

In the following text, “S” refers to studies and “n” refers to number of subjects.

The entire literature search through MEDLINE, EMBASE, and manual bibliography checks yielded 1195 citations, not including duplicate citations from the various sources. Of these, 992 titles and abstracts were rejected during abstract screening. Corresponding full papers of the remaining 203 citations were retrieved for more in depth review. Of the full papers retrieved, 171 were rejected at review or during data extraction, leaving a total of 32 relevant studies for this review. The most common reasons for rejection were “no outcomes of interest” (S=93), which included studies reporting on brain indices other than hippocampus atrophy in MCI subjects progressing to AD as well studies evaluating disease progression in AD subjects. Other reject reasons were: abstracts, review or meta-analyses (S=8), progression to MCI or other types of dementia (S=16), no extractable data (S=12), longitudinal study with less than 18 months follow-up (S=3), studied cognitively normal subjects only (S=4), only reported whole brain atrophy (S=24), studies of AD severity (S=9), and other (S=2). After determining which studies exhibited population overlap, the final dataset of accepted studies consisted of 32 studies, composed of 27 unique primary studies reporting on vMRI biomarkers in predicting progression to AD and five population overlap studies.

Citations of all accepted studies are provided in Appendix 2. Population overlap studies are indented in the listing and are numbered.

One hundred seventy-one publications were rejected during full article review or data extraction and the citations for these are listed, along with the reason for rejection in Appendix 3.

Background information on the qualification

Theoretical Modeling of the Longitudinal Trajectory of AD Using Biomarkers

An understanding of how the various biomarkers (in particular MRI measured HC atrophy and CSF biomarkers) relate to one another is important for understanding both the utility of the MRI biomarker as proposed here, as well as how it may relate to the CSF biomarkers. In particular, the MRI measurement of HC atrophy detects a likely pathological process that gives evidence of ongoing neurodegeneration, and when seen in the hippocampus, the pathology is highly likely to be Alzheimer's disease.

A model (Jack et al., 2010), states that presence of brain amyloidosis is necessary, but not sufficient, to produce cognitive decline (as measured by CSF a-beta); rather, the neurodegenerative component of AD pathology is the direct substrate of cognitive impairment and the rate of cognitive decline is driven by the rate of neurodegeneration (HC atrophy as measured by MRI). In this proposed model, amyloid deposition is dynamic early in the disease process (before cognition is impaired) while neurodegeneration is dynamic in the mid to late stage (as cognition measurably declines).

This disease biomarker model is becoming widely accepted as a framework, incorporating five putative AD biomarkers (based on several consortium consensus statements and literature reviews) into a comprehensive sequence of pathological events as patients progress from cognitively normal in middle age, to dementia in old age. There are presently five well-described biomarkers of AD. Both CSF A β 1-42 and amyloid PET imaging are biomarkers of A β plaque deposition. CSF tau is an indicator of tau pathology and associated neuronal injury. FDG PET measures AD mediated neuronal dysfunction while volumetric MRI measures AD mediated neurodegeneration. This model rests on the assumption that these five AD biomarkers become abnormal in a defined and sequential manner. The hypothesis states that amyloid PET imaging and A β 1-42 become abnormal first, before cognitive symptoms appear, and do so as much as 20 years before the first clinical symptoms of AD are displayed. CSF tau and FDG PET become abnormal later; structural MRI is the last of the five major biomarkers to become abnormal. CSF tau, FDG PET and structural MRI correlate with clinical symptom severity; A β 1-42 and amyloid PET imaging may not, but may be a more direct evidence of pathology. The hypothesis posits that together these five biomarkers of AD stage the complete trajectory, which may span as much as 30 years or more in affected individuals of AD. Figure 2 illustrates this model (Jack et al., 2010).

This model based on the pathological and clinical data leads to the conclusion that established biomarkers, such as vMRI measurement of hippocampal volume (atrophy), are useful for identifying those aMCI subjects who will evolve to the AD dementia (i.e., prodromal AD).

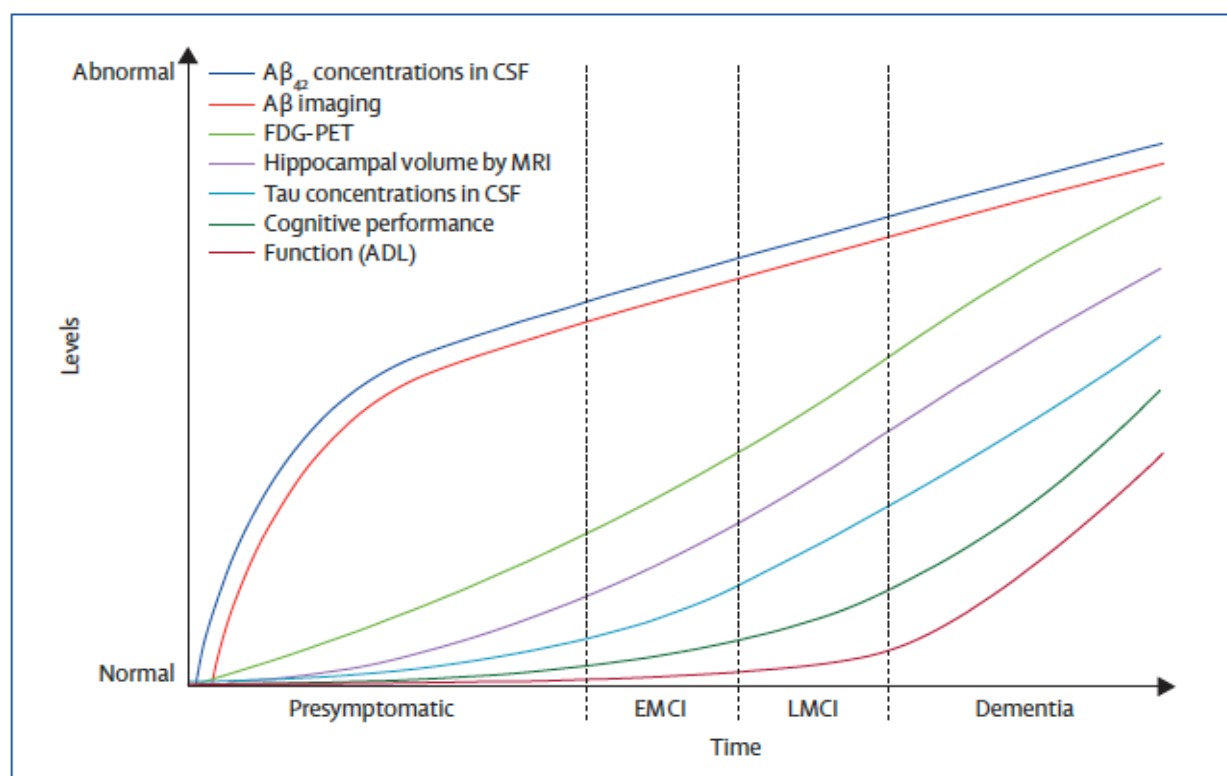


Figure 2: Hypothetical progression of pathological and clinical events that lead to Alzheimer's disease, as detected by use of different imaging techniques, functional measures, or biomarkers. Increases in the extent of pathological abnormality are shown for each imaging measure and biomarker. ADL=activities of daily living; EMCI=early MCI; FDG-PET=18F-fluorodeoxyglucose PET; LMCI=late MCI (Jack et al 2010).

Pathophysiological Rationale

The topology of brain atrophy in AD mirrors that of neurofibrillary pathology (Braak, 1991; Whitwell, 2008; Whitwell, 2007). Atrophy begins, and is ultimately most severe, in the medial temporal lobe, particularly the entorhinal cortex and hippocampus. It has been well established histologically that the hippocampus is affected early in the disease with attendant grossly observable atrophy (Braak and Braak 1991). The sensitivity of volumetric MRI has reached a stage where it can demonstrate even mild AD entorhinal cortex and hippocampus volume reductions of 20–25% relative to normal age matched controls and thereby reflect the observed histopathology of AD (Jack 1997; Juottonen 1999; Lehericy 1994; Bobinski 2000; Xu 2000). There is evidence that volumetric MRI methods can provide more sensitive prediction of progression than CSF or cognitive testing alone (Vemuri, 2009).

Postmortem MRI measures of the hippocampal volume correlate with hippocampal cell counts (Bobinsky, 2000). Ante mortem MRI measures of hippocampal volume are not specific for AD, but do correlate with AD severity as measured by Braak stage at autopsy (Jack, 2002; Gosche, 2002; Jagust, 2008; Silbert, 2003). Patterns of atrophy on ante mortem MRI map onto Braak stage topography in subjects who have undergone ante mortem MRI and autopsy (Vemuri, 2008; Whitwell, 2008). Because other brain regions are also affected by AD pathology, other regions have been examined including entorhinal cortex, whole brain loss, ventricular volume, cingulate volume and others. The hippocampal volume has generally been a reliable predictor of the stage of disease as well as predicting the progression to AD dementia.

Clinical Evidence Informing Selection of HC Atrophy as the Proposed Biomarker

From among the comprehensive literature summarized in Tables 1 and 2, certain papers merit particular mention because of their precedence setting. Jack (1999) found that over a period of 32.6 months, 27 of 80 MCI patients went on to AD type dementia. Hippocampal atrophy at baseline was associated with crossover from MCI to AD (relative risk [RR], 0.69, $p = 0.015$). When hippocampal volume was entered into bivariate models—using age, postmenopausal estrogen replacement, standard neuropsychological tests, apolipoprotein E (APOE) genotype, history of ischemic heart disease, and hypertension—the RRs were not substantially different from that found univariately, and the associations between HC volume and crossover remained significant. Despite the small sample size, a significant relationship between baseline HC volume and crossover to AD illustrates both the strength of the association and the clinical potential of the technique. The W score is the value from a standard normal distribution corresponding to the observed percentile. For example, for a standard normal distribution, the 50, 5, and 2.5 percentiles are given by 0, 21.645, and 21.96, respectively. Thus, a patient with a hippocampal volume (adjusted for age and sex) at the fifth percentile in the normal value database would receive a W score of 21.645. Similarly, a patient at the 50th percentile would receive a W score of 0.

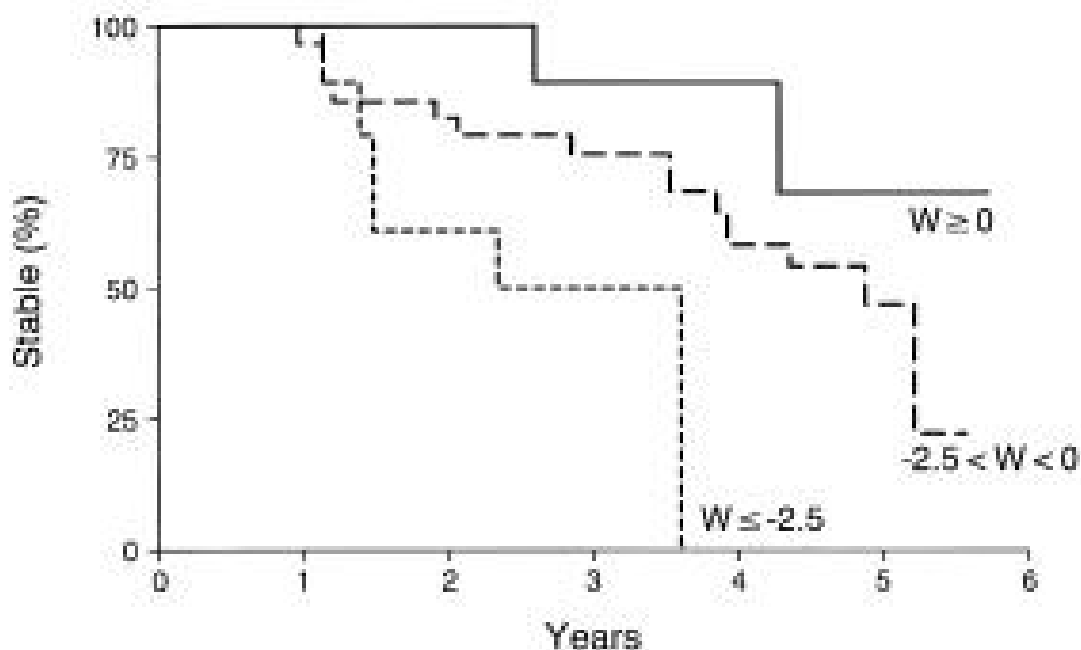


Figure 3: Hippocampal W score and crossover. Kaplan-Meier curves of patients whose hippocampal W score at baseline was ≥ 0 ($n=13$), $-2.5 < W < 0$ ($n=54$) and ≤ -2.5 ($n=13$), (Jack, 1999).

Note: W-score is the relative score of the measured HC volume corrected for intracranial volume and compared to age and sex adjusted normals.

In a subsequent study, Jack (2005) examined both single time point MRI and rate of change MRI as predictors of future conversion from MCI to AD and found that baseline HC atrophy predicted conversion from MCI to AD dementia. This study supports the premise that cross-sectional HC volume is an important predictor of time to conversion among MCI subjects. In addition, atrophy rates of either whole brain or ventricle from serial scans provide predictive information about the hazard of

subsequent conversion from MCI to AD, which is complimentary to that provided by a cross-sectional hippocampal measure. Among MCI patients, the key MRI predictors of conversion seem to be how much the hippocampus has atrophied at the baseline time point, suggesting that the brain has been atrophying for the 1 to 2 years before baseline.

Subjects with MCI who subsequently converted to AD have also been shown to have a lower baseline hippocampal volume compared with those MCI subjects that do not convert in the same time interval (Chupin et al. 2009; Devanand et al. 2007; Jack et al. 2000; Risacher et al. 2009; Leung et al. 2010).

Longitudinal studies that have assessed multiple time-points over the course of the disease have demonstrated that rates of atrophy are not changing at a linear rate over time, but instead tend to accelerate as the disease progresses. Two earlier studies investigating subjects with familial AD demonstrated that rates of whole brain and hippocampal atrophy increase over time as the subjects progress from clinically normal to AD (Ridha et al. 2006). This phenomenon has recently been investigated and confirmed in two larger cohorts (Jack et al. 2008). Whitwell (2007) described how cognitive changes before and up to dementia can be categorized as a continuum. This matches the progression that is observed clinically, which encompasses a long, slow early phase.

vMRI Measurement Standardization

In submitting this data, CAMD has made no assumptions regarding specific image acquisition or analytic methodology. That the results are as consistent as they are without uniform standardization of specific methodology in acquisition and analysis speaks to the robustness of the biomarker. As used in a clinical trial, a single methodology for acquisition is typically specified to be consistent across each of the trial sites. In addition, a single core lab is now generally selected based on specific experience and attention to acquisition quality control and consistent analysis processes. This, in turn, determines the excellent reliability of the final vMRI numeric endpoint.

There is no single standard normative hippocampal volume or a widely accepted definition of what constitutes atrophy outside of individual laboratories. Initiatives such as Alzheimer's Disease Neuroimaging Initiative (ADNI) in North America, and their counterparts in Europe, Japan, and Australia among others, have standardized image acquisition and post-processing methods. These (or similar) standards have been adopted in most subsequent trials.

However, in a laboratory with experience in applying an analytic technique, the measurement of HC volumes will be internally consistent and reliable (as illustrated in the submitted papers). This is felt by the CAMD consortium members to be sufficiently accurate to, on a lab-by-lab basis, determine their normal values and from that, derive a numeric volume below which the subject will meet criteria for the categorization as likely to progress to AD dementia. The various means hitherto employed for these determinations are described in the submitted articles.

An effort to standardize and publish HC volumes is now underway through a cooperative effort of the European Alzheimer's Disease Centers (EADC) – ADNI Hippocampal Harmonization Effort (Frisoni 2011, Boccardi 2010). This effort is intended to establish a Reference Standard of hand-drawn hippocampal volumes that can be distributed to the various core laboratories to compare their methodologies with this standard.

Even without these published standards, the ability of an individual laboratory to set its own standards as long as sufficient attention is given to accepted methodology, the accuracy is believed to be sufficiently advanced and reliable to justify use in multicenter clinical trials for the stated context of use.

Summary

CAMD has presented data from an extensive literature review in which all but two of the identified studies found that baseline measurement of low HC volume (atrophy) predicts evolution to AD dementia. This predictive value is reported in the great majority of studies, despite different analytic methodologies and statistical approaches. Standardization of hippocampal volume measurement is being addressed through international efforts to enable cross study comparisons. Single center centralized reading, however, as utilized in multicenter trials, can demonstrate appropriate internal reproducibility of volume calculations sufficient for clinical trials use. The data presented here support the proposed context of use.

In application, subjects with episodic memory deficits (the core diagnostic criteria of Dubois, 2007) would receive vMRI HC volume evaluation as part of the trial participation selection process. This evaluation would be expected to improve the patient selection by predicting which subjects would likely progress to AD dementia within a time range appropriate for a therapeutic clinical trial. This enrichment strategy will enable enrollment of subjects who are more likely to benefit from a treatment, and thus will enable a trial sponsor to reduce subject numbers and increase power, all of which should facilitate a trial with an informative outcome.

Based on the coordinators' reports the CHMP gave the following answers:

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's Disease

SUMMARY

The purpose of this "qualification" procedure is to assess whether low hippocampal volume as measured by MRI and considered as a dichotomized variable (low volume or not) can be considered a marker (a risk/ prognostic factor) of progression to dementia in subjects with cognitive deficit compatible with early Alzheimer's disease (ideally, without previous or concomitant pharmacological treatment for it).

The potential value of the proposed marker in other settings (e.g. in subjects without cognitive deficit or unlikely to have early AD for other reasons) or for other purposes (e.g. as a criterion for the diagnosis of a condition/disease -namely Alzheimer's disease- in a particular subject or the usefulness of repeated measurements to assess the effect of therapeutic interventions -as a marker of efficacy-) are not considered here.

Identifying subjects at higher risk of developing AD dementia (as intended in this procedure) may serve useful purposes even in the absence of effective treatments for the disease.

The one contemplated in this procedure is to "enrich" recruitment into clinical trials aimed at studying drugs potentially slowing the progress/conversion to (AD) dementia of the included patients. Enrolling "non-enriched" samples (basing inclusion only on the cognitive deficit) could mean that few subjects would convert during the duration of the trial. Impractically large numbers of subjects and/or duration of follow-up would be required and the trials would be unfeasible or inefficient. Other biomarkers to "enrich" recruitment into this type of clinical trials are known (e.g. some CSF analytes) but their

relative value to low hippocampal volume (to accurately predict rate of conversion within the recruited population) is only theoretically discussed (rather than with data) in the narrative of the Sponsor.

SCIENTIFIC DISCUSSION

Accepting the value of the biomarker to “enrich” recruitment is, probably, less demanding than assessing its value in other potential uses (see above) as less accuracy in the prediction is required than e.g. to include a particular individual into a diagnostic category. It has to be considered that, in the end, the rate of patients spontaneously converting in the control arm of the trial (whether accurately predicted or not) will be known at the end of the trial so that the consequences of some out of target prediction would not be as crucial as the same inaccuracy would be to establish a relevant diagnosis in an individual subject.

The data on which the Sponsor base their request for the biomarker to be accepted as qualified derive from a systematic review they have conducted after searching the literature for longitudinal studies evaluating MRI-assessed hippocampal “atrophy” (controversially used by the Sponsor as synonymous to low hippocampal volume) in predicting conversion to AD dementia from a baseline memory impaired state.

The conclusions are mainly obtained via a “voting” procedure (the *majority of studies* report that.....) but although it can be accepted that a true metaanalysis would, probably, have been unfeasible given the heterogeneity of the studies, further attempts to obtaining global estimates may well be justified.

On the face of the results as now presented, it would appear that low hippocampal volume, in a context of cognitive deficit compatible with the early stages of AD may, indeed, be a risk/ prognostic factor for developing dementia very likely of sufficient strength to significantly “enrich” recruitment into clinical trials.

However, some discussion with the Sponsor is needed, both to clarify some aspects of the systematic review and its internal and external validity and to explore whether a more in depth analysis of the retrieved data could justify a more precise statement than simply accepting the vague view that using low hippocampal volume as a biomarker would “somewhat” enrich recruitment into clinical trials within the considered context. If the review is finally considered valid, this is the type of statement that would be supported by the current analyses.

Based on the co-ordinators' reports the Scientific Advice Working Party determined that the Company should discuss the following points, before advice can be provided:

CHMP/SAWP Question

Accuracy data (Figure 1) should be represented in a classical ROC space and the Sponsor should try to formally summarize information provided (sROC model or average operating point along with criticism about its representativeness).

Applicant's response

We agree that the ROC analysis is a key evaluation parameter in evaluating the prediction data. As before noted, the data included in the reported studies was insufficient to perform an AUC analysis on even a subset of the studies. In its stead, we performed a *de novo* analysis on hippocampal volume interpretation of MRI images generated from the ADNI study. The objective of this analysis was to determine whether hippocampal volume quantification method significantly impacts the prediction of conversion. The results of our review across the literature suggest that the hippocampal volume quantification method (the one heterogeneous variable across the studies analyzed here *de novo*) does not likely impact interpretation of biomarker results.

To further address this query from the SAWP, CAMD presents the results of this *de novo* analysis. It is based on the ADNI study data with well-standardized aMCI patient data. We obtained data from four distinct hippocampal volume analysis methodologies. The variable is the volume reconstruction and interpretation. The subject definition and image acquisition methods were standardized as described in the ADNI protocol. Note that the ADNI image acquisition methodology is being copied in studies in Europe, Australia, Japan, and Korea. Using a statistical approach described below, we performed the *de novo* analysis and present the results in ROC format. Below is a summary of the statistical approach employed to evaluate the use of baseline MRI of the hippocampus in subjects diagnosed with cognitive impairment to predict conversion to Alzheimer's dementia, followed by a summary of the key findings of that analysis. The details of the analysis are located at the end of this document in a supplemental analysis section.

Statistical approach: For these analyses, ADNI data were used. A sub-dataset that included all the MCI patients was prepared utilizing demographic information, conversion records, cognitive test scores, APOE status, and baseline volumetric MRI data. These data were analyzed with results from four different automated hippocampal volume measuring techniques: FreeSurfer (Fischl, et al., 2002), NeuroQuant™ (Holland, 2009, Brewer, 2009), Learning Embedding for Atlas Propagation (LEAP) (Wolz, 2010), and HMAP (Leung, et al., 2010).

Acquisition of the scans was done using the MPRAGE protocol specified by ADNI. MPRAGE (Magnetization Prepared Rapid Gradient Echo) is designed for rapid acquisition with T1 weighted dominance. Fast gradient echoes are characterized by their rapid sampling time, high signal intensity and image contrast while approaching steady state (the echo is collected during the time when tissues are experiencing T1 relaxation). The rapid speed of the acquisition makes it an excellent alternative to earlier techniques. Hippocampal volumes were corrected using intracranial volumes to control for head size variability.

One important statistical quality measure prospectively set up as subjects enrolled in the ADNI study are randomized to training and test data set defined by the ADNI core team. This technique allows for cross-validation. The models here are built only on the training dataset and tested on the testing dataset. Summary statistics were calculated for dynamic range, mean, median, minimum, and maximum in the MCI population. Cox regression models of hippocampal volume were built using the training set with covariates, including age, gender, race, APOE, education, and the cognitive test

scores. Time to conversion was measured from baseline using visit code (6, 12, 18, 24, 36 months) instead of exact time elapsed. Statistical significance for inclusion of the variables in the model was determined as a two-sided p-value < 0.05. The model was then applied to the test set to predict time to conversion, and the accuracy reported using mean square errors. A logistic regression model was similarly developed with the training set, and then applied to the test set. Subjects that converted to AD in two years were counted as converters, and subjects that did not convert in two years were considered non-converters. Receiver operating characteristic (ROC) curve analysis was performed to evaluate the best discrimination of the biomarkers for conversion to AD. The area under the ROC curve (AUC) was used as a measure of the overall performance of the ROC curve.

Findings: In the figure A 2 below, ROC curves of hippocampal volume predicting conversion to AD for the four different quantitative methodologies are shown superimposed on the literature reported sensitivities/specificities Figure A 1. They are not significantly different, with AUC ranging from 0.694-0.74 for the test set. MRI acquisition, while similar in the literature presented in Table A, is identical in ADNI protocol. The image interpretation in ADNI however uses various methods. CAMD analysis of the ADNI MCI cohort using these four different measurement techniques standardized using the same intracranial volume measurement, and cross-validated using a predetermined test set. This *de novo* analysis strongly supports the proposed context of use. It also suggests that different volumetric measures performed on a standard dataset can be compared.

Representativeness: The SAWP further requested comments on the representativeness of the data. To this end, we present four different analytic techniques on images obtained using current state of the art image acquisition techniques, two of which were developed in Europe (LEAP HMAP), and two in North America (Freesurfer and Neuroquant).

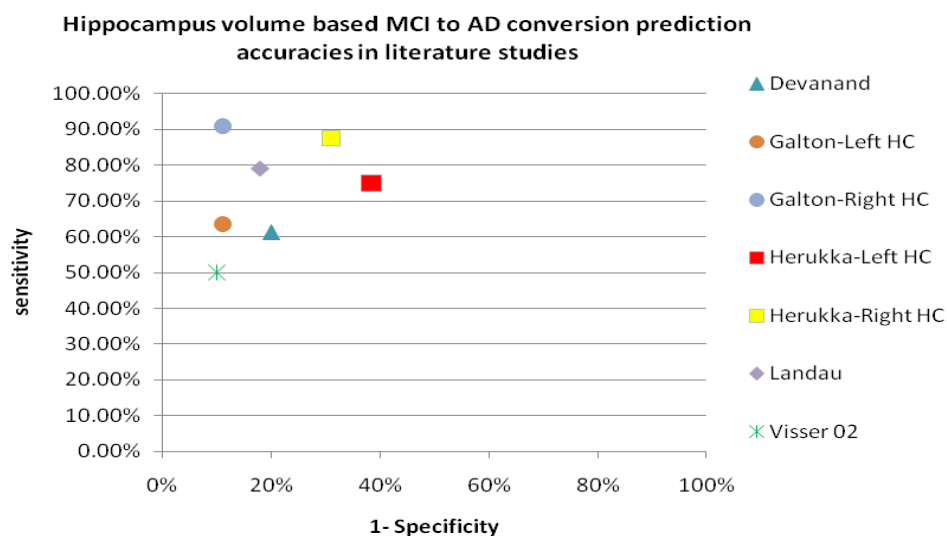
Figure A1 illustrates sensitivity and specificity point data from the literature studies that reported that data, then Figure A2 contains the same point data superimposed on *de novo* ADNI ROC curve data. Note that the ADNI data (color lines in Figure A2) are only slightly lower than literature results published by other groups (color dots in Figure A1). In addition, the original submission lists four studies that reported ROC AUC figures as follows: Bakkour (0.65), Devenand (0.77), Fleischer (0.604), and Galluzzi (0.73) (See table B, below). These reported ROC values are very similar to the *de novo* analysis.

The literature figures (color dots) are not substantially different than the ones presented in the *de novo* ADNI (color lines) analysis (Figure A2), and this similarity lends support to the consistency of the acquisition and reconstruction technique conducted in different centers.

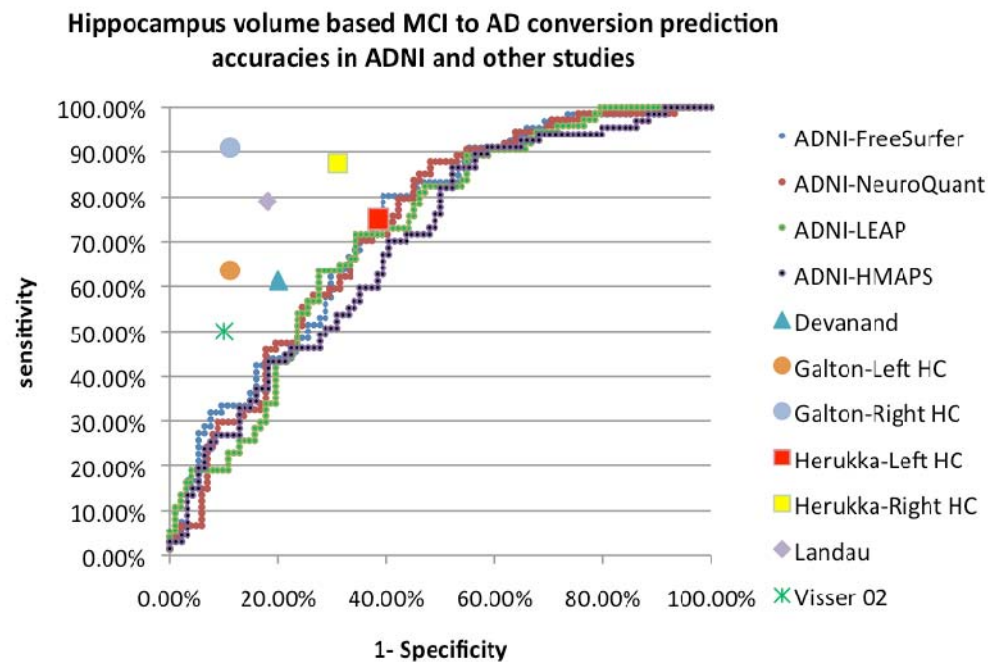
The highlighted literature articles that reported sensitivity and specificity (Table 1 in the submission and reproduced below) are all similar to or better than the CAMD analysis of the ADNI data, though some of these studies are of a small number of subjects with the consequential greater variability. There may be other bias present as noted in Question 4.

Regarding the hippocampal border delineation technique, the Fleischer article used a manual tracing method on early results of the ADNI data and had similar results to the more automated methods. The Galluzzi paper also reported using manual tracing. Bakkour used an automated approach. Based on the diversity of acquisition and analytic techniques yielding comparable results, the Sponsor believes the results reported here are representative.

711 Figure A1: Literature studies alone



712
713 Figure A2: Literature studies (points) combined with ADNI four analyses (ROC curves)



714

Table B			
Comparison between published and de novo ADNI analysis			
	Study	N	ROC
De Novo ADNI data	LEAP	176	0.7178
	NeuroQuant	176	0.7358
	FreeSurfer	159	0.7318
	HMAP	161	0.694
Reported AUC from published literature	Bakkour	49	0.65
	Devenand	139	0.77
	Fleisher	129	0.604
	Galluzzi	90	0.73

715 **CHMP/SAWP Question**

716 **The Sponsor has included as favorable even studies with a sensitivity of**
717 **50%.**

718 **Applicant's response**

719 CAMD queried the author (Pieter Visser) regarding the study cited in the question (Visser, 2002). His
720 response is as follows:

721 "You probably used data of hippocampal volume from Table 3. These are results from a multivariate
722 model including age, memory, and hippocampal volume. The table demonstrates the added value of
723 hippocampal volume over age and cognition, not the predictive accuracy of hippocampal volume
724 alone."

725

726 "You may alternatively use data from Table 2. For subjects with a hippocampal volume in the lowest
727 tertile, the sensitivity to predict AD is 86% (6/7) and the specificity 77% (17/22)."

728 From this response, the result is actually considerably better than the reported sensitivity data
729 analysis, which CAMD originally submitted. For technical reasons, however, this was one of the articles
730 that were identified as having fallen below the minimum 18-month follow-up for all subjects and,
731 therefore, is here considered only as supportive.

732 **Overall conclusions**

733 The SAWP has raised valid considerations in response to the Sponsor's application, particularly
734 concerning systematic bias, reporting bias, and publication bias, as well as heterogeneity concerns. It
735 is hoped that the responses detailed above, with the supplemental data presented, have adequately
736 addressed these issues.

737 Supplemental data on ROC analysis

738 Key findings:

739 FreeSurfer Methodology: Cox regression analysis on the ADNI training data set using FreeSurfer with
740 ICV from UCSD shows significant effects of cognitive tests, hippocampal volume, and age in the model
741 (below).

Analysis of Maximum Likelihood Estimates							
Parameter	DF	Parameter Estimate	Standard Error	Chi-Square	Pr > ChiSq	Hazard Ratio	Label
TO TA LM OD	1	0.08955	0.02701	10.9889	0.0009	1.094	ADAS-Cog (total 85)
Uc sf_ hip po c_ av g	1	-1.80652	0.43970	16.8800	<.0001	0.164	Average Volume of Hippocampus (Ucsffsl,unit=cm^3)
ag e	1	-0.07298	0.02775	6.9159	0.0085	0.930	
ge nd er	1	-0.61660	0.40784	2.2858	0.1306	0.540	1=male 2=female
ed u	1	0.02185	0.05605	0.1520	0.6967	1.022	Education (0-20)
rac e	2 1	-0.38638	1.02520	0.1420	0.7063	0.680	Racial Categories:1= American Indian or Alaskan Native 2=Asian 4=Black 5=White 2
rac e	4 1	0.54426	0.78340	0.4827	0.4872	1.723	
ap oe	0 1	-0.22659	0.31806	0.5076	0.4762	0.797	0=none e4; 1=1 or 2 e4 0
IC V_ UC SD	1	3.92897E-7	1.36991E-6	0.0823	0.7743	1.000	Intracranial Volume

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744

745

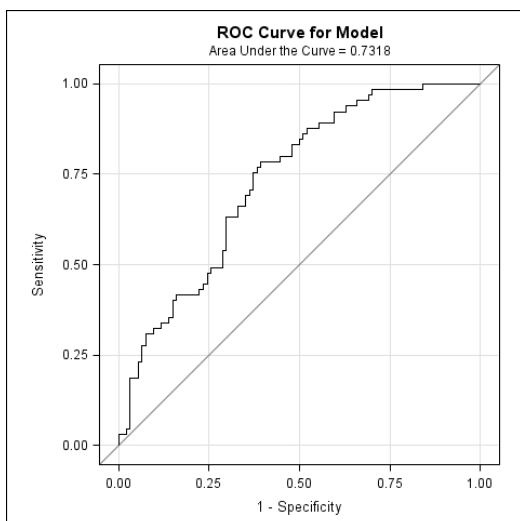
746

The model was then applied to the ADNI test dataset. Survival probability and true conversion record at two years were compared to generate the ROC curve. The AUC is 0.7318 (graph below). The number of observations used was 159.

747

748

NeuroQuant Methodology: When the same model was run using ICV data from NeuroQuant, the results were similar, but yielded a slightly higher AUC of 0.7358.

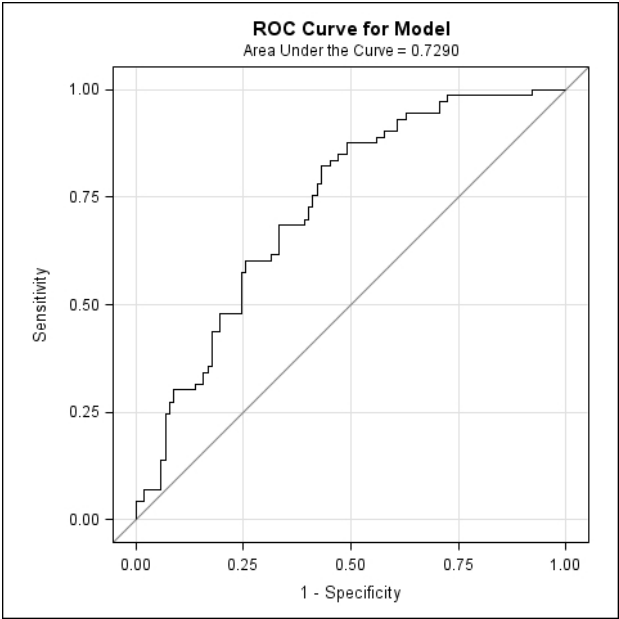


Cox regression analysis on the ADNI training data set using hippocampal volume measurements by NeuroQuant methodology and ICV measurements from UCSD shows significant effects of cognitive tests, hippocampal volume, and age in the model (below).

Analysis of Maximum Likelihood Estimates								
Parameter		DF	Parameter Estimate	Standard Error	Chi-Square	Pr > ChiSq	Hazard Ratio	Label
TOTAL MOD		1	0.09434	0.02657	12.6026	0.0004	1.099	ADAS-Cog (total 85)
NQ_hippoc_avg		1	-1.54063	0.40275	14.6324	0.0001	0.214	Average Volume of Hippocampus (NQ,unit=cm^3)
age		1	-0.06313	0.02620	5.8075	0.0160	0.939	
gender		1	-0.51099	0.40349	1.6038	0.2054	0.600	1=male 2=female
edu		1	0.04260	0.05317	0.6419	0.4230	1.044	Education (0-20)
race	1	1	-11.36328	961.31398	0.0001	0.9906	0.000	Racial Categories:1= American Indian or Alaskan Native 2=Asian 4=Black 5=White 1
race	2	1	-0.48087	1.02597	0.2197	0.6393	0.618	
race	4	1	0.61633	0.78711	0.6131	0.4336	1.852	
apoe	0	1	-0.31960	0.31389	1.0367	0.3086	0.726	0=none e4; 1=1 or 2 e4 0
ICV_UCSD		1	5.12948E-8	1.33867E-6	0.0015	0.9694	1.000	Intracranial Volume

This model was then applied to the ADNI test data set. Survival probability and true conversion record a two years were compared to generate the ROC curve. The AUC is 0.7290 (below). Number of

Observations Used is 175. When NeuroQuant ICV measurements were used in the Cox and logistic models, the results were similar, but yielded a very slightly higher AUC of 0.7295.

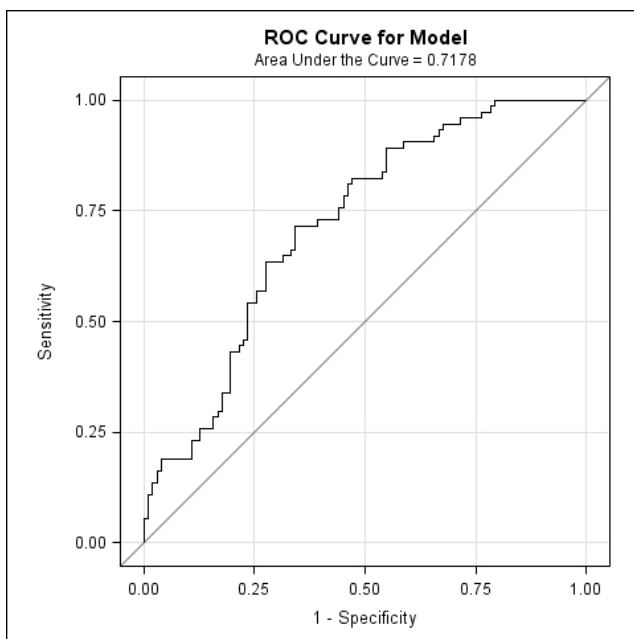


LEAP methodology: Cox regression analysis on the ADNI training data set using hippocampal volume measurements by LEAP methodology and ICV measurements from NeuroQuant shows significant effects of cognitive tests, and is marginally significant for hippocampal volume. Age is not significant in this model (below).

Analysis of Maximum Likelihood Estimates							
Parameter	DF	Parameter Estimate	Standard Error	Chi-Square	Pr > ChiSq	Hazard Ratio	Label
TOTAL MCD	1	0.11659	0.02655	19.2892	<.0001	1.124	ADAS-Cog (total 85)
Leap-hippoc-avg	1	-1.16436	0.64906	3.2181	0.0728	0.312	Average Volume of Hippocampus (Leap, unit=cm ³)
age	1	-0.03322	0.02357	1.9868	0.1587	0.967	
gender	1	-0.21963	0.38702	0.3221	0.5704	0.803	1=male 2=female
edu	1	0.06217	0.05069	1.5042	0.2200	1.064	Education (0-20)

Analysis of Maximum Likelihood Estimates							
Parameter	DF	Parameter Estimate	Standard Error	Chi-Square	Pr > ChiSq	Hazard Ratio	Label
rac	1	-11.49301	953.46912	0.0001	0.9904	0.000	Racial Categories:1= American Indian or Alaskan Native 2=Asian 4=Black 5=White
rac	1	-0.37528	1.03295	0.1320	0.7164	0.687	
rac	1	-0.15017	0.75263	0.0398	0.8419	0.861	
age	1	-0.49176	0.30824	2.5452	0.1106	0.612	0=none e4; 1=1 or 2 e4
NQ-ICV-adjust	1	-0.0004429	0.00138	0.1027	0.7486	1.000	Intracranial Volume (NQ, Left+ Right)

769
770 This model was then applied on the testing data. Survival probability and true conversion record at
771 two years were compared to generate the ROC curve. The AUC is 0.7178. Number of Observations
772 Used is 176.

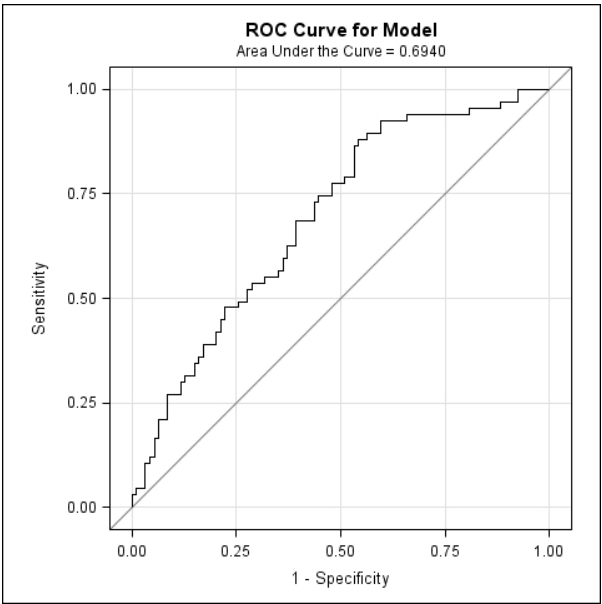


773
774
775 HMAP Methodology: Cox regression analysis on the ADNI training data set using hippocampal volume
776 measurements by HMAPs methodology and ICV measurements from HMAP shows significant effects of
777 cognitive tests, hippocampal volume, age, and APOE status

778

Analysis of Maximum Likelihood Estimates							
Parameter	DF	Parameter Estimate	Standard Error	Chi-Square	Pr > ChiSq	Hazard Ratio	Label
TOTAL MOD	1	0.07826	0.02611	8.9830	0.0027	1.081	ADAS-Cog (total 85)
HMAPS_hippoc_avg	1	-2.35702	0.53046	19.7432	<.0001	0.095	Average Volume of Hippocampus (HMAPS,unit=cm^3)
age	1	-0.07945	0.02646	9.0194	0.0027	0.924	
gender	1	-0.57911	0.41700	1.9286	0.1649	0.560	1=male 2=female
edu	1	-0.0006536	0.05397	0.0001	0.9903	0.999	Education (0-20)
race	2 1	-0.24979	1.02904	0.0589	0.8082	0.779	Racial Categories:1= American Indian or Alaskan Native 2=Asian 4=Black 5=White
race	4 1	0.11752	0.77125	0.0232	0.8789	1.125	
apoe	0 1	-0.67855	0.32512	4.3558	0.0369	0.507	0=none e4; 1=1 or 2 e4
ICV_HMAPS	1	0.0008012	0.00142	0.3175	0.5731	1.001	Intracranial Volume, HMAPS

When the model was applied to the ADNI test set, the survival probability and true conversion record at two years were compared to generate the ROC curve. The AUC is 0.694. Number of Observations Used is 161.



There was a strong correlation among ICV measurements reported by UCSD and NeuroQuant. The measurements of hippocampal volume adjusted for ICV by each of these techniques produced results that were not significantly different.

There was a strong correlation among hippocampal volumes for all methods reported here.

Table A Summary of cognitive and MRI parameters.

Study	Subject Handling	Total MCI n	Qualifying	Outcome	Image Acquisition	Image Reconstruction/Analysis	
			Cog test	Measurement		Manual/semi-Automatic/automatic	ICV corrected
Bauck 2009	49 MCI subjects followed with 29 no change; 20 converted. Followed for 3 years	49	CDR 0.5	CDR 1	Multiple (three or four) structural T1-weighted magnetization-prepared rapid gradient echo images were acquired on a 1.5 T Siemens Vision scanner (Siemens Medical Systems, Erlangen, Germany) using the following parameters: repetition time/echo time/inversion time/delay: 9.7/4/20/200 msec, flip angle: 10 °, matrix: 256 × 256 (1 mm × 1 mm in-plane resolution), 128 sagittal (1.25 mm slices without gaps). These images were motion- corrected and averaged together during processing.	Automated tissue segmentation and surface reconstruction and alignment of participants. These methods have been previously described in detail, including the surface-based cortical thickness processing and spherical registration to align subjects' cortical surfaces. ^{12, 17-22} The methods are summarized in appendix e-1 on the Neurology® Web site at www.neurology.org .	Yes

C o n v i t 2 0 0 0	Individuals received an MRI at baseline and a clinical and cognitive evaluation at baseline and follow-up. 26 normal elderly (NL) and 20 individuals with mild cognitive impairment (MCI). Fourteen individuals (12 from the MCI group and two from the NL group) declined to DAT within the 3.2-year follow-up interval.	20	GDS 3	GDS 4	Eighteen coronal T1-weighted spin echo (630/20/1; TR/TE/excitations) MR images (4 mm- thick with a 10% gap) were acquired to include the entire temporal lobe. The field of view was 23 cm and the acquisition matrix 256 by 256 pixels.	With the Multimodal Image Data Analysis System (MIDAS) [41] we drew regions of interest on 3-fold enlarged images. All the image analyses were performed blind to group membership. With a mouse-driven cursor we out- lined the temporal lobe structures and then excluded the pixels that fell within a visually determined threshold for cerebrospinal fluid (CSF). The volumes of the temporal lobe structures were estimated from the pixel counts over the slices that were chosen for these measurements.	No
D e s i k a n	129 subjects recruited through print media, tested and followed. Typical inclusion criteria employed.	129	CDR 0.5	Consensus DX of AD	T1-weighted 3D spoiled gradient-recalled echo (SPGR) scans were acquired by using the following sequence: 1 coronal acquisition, TR: 35 ms, TE: 5 ms, FOV :220 mm, flip angle: 45°, section thickness: 1.5 mm, matrix size: 256 × 256, NEX: 1.	FreeSurfer with manual ROI confirmation	Yes

2009							
Deviskann2008	The subjects were chosen from the larger population of 339 subjects as being the only ones who met the clinical criteria for this study and had two MRI scans that were acquired on a 1.5T GE scanner, obtained with an SPGR sequence.	47	CDR 0.5	Consensus DX of AD	MRI scans were acquired on a 1.5-T scanner (GE, Milwaukee, WI). T1-weighted three-dimensional spoiled gradient echo (SPGR) scans were acquired using the following sequence: coronal acquisition, repetition time 35 msec, echo time 5 msec, field of view 220 mm, flip angle 45°, slice thickness 1.5 mm, matrix size 256x256 NEX 1	FreeSurfer with manual ROI confirmation	No

Devin	Patients presented with memory complaints to the Memory Disorders Center at New York State Psychiatric Institute and Columbia-Presbyterian Medical Center. Enrolled a broad sample of cognitively impaired outpatients who presented with memory complaints and were found to have cognitive impairment without dementia based on comprehensive evaluation, but without a specific diagnosable cause for the cognitive impairment. Typical inclusion criteria employed.	139	Folstein MMSE recall : 2 out of 3 objects at 5 minutes, or a Selective Reminding Test (SRT) delayed recall score : 1 SD below norms, or a Wechsler Adult Intelligence Scale-Revised (WAIS-R) performance IQ score : 10 points below the WAIS-R verbal IQ score	Consensus DX of AD DSM IV or NINCDS	T1-weighted axial images parallel to the temporal horns using a spin echo sequence with TR: 550, TE: 11, 5-mm slice thickness without gap, matrix: 256x 192, 1 NEX, and 24-cm FOV; 3) proton density and T2-weighted fast spin echo coronal images, perpendicular to the temporal horns, acquired with a dual echo sequence with an 8-echo train, TR: 4,000, TE: 17 and 102, 5-mm slice thickness without gap, matrix: 256x 192, 1 NEX, and 20 cm FOV; 4) three-dimensional coronal volume spoiled gradient recalled echo (SPGR) sequence, perpendicular to the temporal horns, with TR: 34, TE: 13, flip angle 45 degrees, 2-mm-thick contiguous slices, matrix 256x 256, 1 NEX, and a rectangular FOV of 24 x 18 cm.	A dedicated software package (MIDAS) for image segmentation and coregistration. ¹⁸ To evaluate hippocampus, parahippocampal gyrus, and entorhinal cortex volumes, images from the coronal SPGR sequence were realigned to a standard orientation and reformatted using sinc interpolation to a 2-mm slice thickness in the coronal plane.	Yes
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E c k e r s t r o n 2 0 0 8	The Göteborg MCI study [2] is a clinically based longitudinal project that aims at identifying neurodegenerative, vascular and stress-related disorders prior to the development of dementia. At baseline patients and controls undergo investigations including neurological, psychiatric, cognitive screening, neuropsychological testing, MRI, SPECT, EEG, sampling of blood and CSF. At biannual follow-ups, most of these investigations are repeated. MRI is done at the first (two-year) and the third (six-year) follow-up.	42	Informant verification of a progressive cognitive impairment >6 months. Plus: positive outcome on STEP, I-Flex, MMSE, or CDR. Subjects with >2 positive outcomes on STEP or a score <25 on the MMSE, equaled dementia and were excluded	GDS+4 and ICD-10 + AD: NINCDS ; Sub-cort Vascular Dementia: Erkinjuntti criteria; FTD: Lund and Manchester criteria	Philips NT5 0.5T scanner: 3 sequences: 1 and 2: 3D T1 FFE, coronal and axial with a slice thickness 1.5mm; Repetition time 30ms; Echo 10ms; flip angle 40 degrees, FOV 220; Acquisition Voxel size 0.86mm, reconstructed voxel 0.86. Sequence 3: T2 TSE slice thickness 4mm; Repetition time 46820ms; Echo 120ms; flip angle 90 degrees, FOV 230; Acquisition Voxel size 0.9/1.13mm, reconstructed voxel 0.45/0.45.	Manual in the Hipposegm routine — a software which includes Bayesian noise reduction and image intensity normalization. The segmentation process consisted of two steps: 1. Point-wise landmark setting was done in the sagittal view of the reformatted coronal image where the demarcation in the original coronal image is indiscernible or difficult to interpret [47, 48]. 2. Segmentation of the hippocampus in the coronal images was done by continuous pen drawing. The Hipposegm program samples pointwise from the pen drawing. By means of the landmark setting, and intensity and noise preprocessing, the whole hippocampus including the tail could be segmented without ad	Yes
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						hoc determination of the most anterior and the most posterior slice	
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F e l l g i e b e l 2 0 0 6	We enrolled 18 MCI patients who consulted the University memory clinic for diagnostic evaluation of memory complaints. MCI was defined according to the criteria of Petersen and a Clinical Dementia Rating (CDR) of 0.5	13	CDR 0.5	CDR $\geq$ 1 + DSM IV		To place rectangular regions of interest (ROIs) and to determine regional index values, Image-J software was used (NIH, Bethesda, MD, USA). Individual ROIs were manually placed bilaterally in the hippocampal region (Fellgiebel et al., 2004; Müller et al., 2005). To minimize susceptibility artifacts, we applied the largest ROI size. Segmentation and whole-brain-volume calculation were carried out with VoxelQ software (Marconi Systems, Cleveland, OH, USA)	Unk
F l e i s h e r 2	ADNI report. Analysis was only performed on participants who met criteria for AD within 36 months, or who completed a 36-month visit.	129	CDR 0.5; MMSE 24-30; 1.5-2.0 SD below age adjusted norms on LM II	NINCDS ; loss of function based on GDS or SDCS-ADL	1) A sagittal T1-weighted scan with contiguous 5-mm slices, 2) a three-dimensional volumetric spoiled gradient recalled echo (SPGR or equivalent) scan obtained in the coronal plane with minimum full echo-time, minimum repetition time, 124 partitions, 25 degree flip angle, and 1.6 mm partition thickness.	Hippocampal and ERC measurements were performed by manual tracing. Scans were interpolated in-plane to the equivalent of a 512 x 512 matrix and magnified times two. Anatomic criteria used to define the boundaries of	Yes

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

008 ADDENBROOKE					The range in repetition time was 9.7 msec to 33 msec and the range in echo time was 3 to 11 msec.	the hippocampus and ERC have been published.	
Ga 108 subjects consecutively enrolled over 24 months with 90 completers	90	Multiple tests, cutoff: bottom 5%	NINCDS	MR images (axial T2 weighted proton density, fluid attenuated inversion recovery, and gradient echo 3D images) 1.0-T Philips Gyroscan. TR: 20 ms, TE 5 ms, flip angle 30 , field of view 220 mm, acquisition matrix 256 9 256, slice thickness 1.3 mm.	Manually traced ROI. Hippocampal volume (the smallest between the left and right side) below the fifth percentile of the volume distribution (1,970 MicroL) in a population of 125 normal subjects 60 years and older taken from a study on the structural features of Normal aging	Yes	
Ga Patients recruited from the Memory Clinic in Addenbrooke's Hospital, Cambridge, for a longitudinal project, 24 who had undergone suitable MRI imaging at entry	31 QD	=CDR 0.5	NINCDS	three-dimensional spoiled gradient-recalled T1-weighted sequence	NA	No	

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

005	(V1 = first visit).						
H e n n e n a n 2 0 0 9	Memory clinic patients: 64 AD, 44 MCI, 34 controls: 26 patients with subjective complaints, 8 healthy control	44	CDR 0.5	NINCDS	1.0-T scanner. Coronal, three-dimensional, heavily T1-weighted single slab volume sequence (magnetization-prepared, rapid acquisition gradient echo sequence); rectangular 250 mm field of view with a 256 × 256 matrix; 1.5 mm slice thickness; 168 slices; 1 × 1 mm in plane resolution; repetition time: 15 msec; echo time 7 msec; inversion time, 300 msec; flip angle 15°.	Manually delineated using the soft- ware package Show_Images 3.7.0. L&R HC volumes were averaged	Yes
H e r u k k a 2 0 0 0	21 MCI subjects followed for average 4.1 years.	21	cdr 0.5 plus 1.5SD below N on other cog test	NINCDS	1.5 Tesla Vision, rapid acquisition gradient echo sequence (for the 1998/1999 patients: TR = 9.7 ms, TE = 4 ms, matrix 256 × 256, 1 acquisition and in plane resolution = 0.98 mm. For 1999/2000/2001 patients: TR = 13.5, TE = 7, matrix 256x256, 1 acquisition and in plane resolution = 0.94 mm.	Manual tracing.	Yes

8							
J a c k 2 0 1 0 A D N I	218 MCI follow up 1.7 ys	218	CDR 0.5; MMSE 24- 30; 1.5-2.0 SD below age norms on LM II ADAS-cog 11	DSM IIIR + NINCDS	1.5 T 3D MPRAGE.	FreeSurfer. Correction gradient non-linearity, B1 non-uniformity.	Yes
J a c k 2 0 0 8	Vitamin E and donepezil treatment in 769 aMCI follow up 36 months.	131	Peterson criteria + LM II	NINCDS	1.5 T, 24 scanners from GE, Siemens, Philips. 3D T1 coronal SPGR: TR/TE = 9.7-33/3-11 mse. Flip angle: 25 °. 124 continuous partitions.	Central data analysis at Mayo Clinic in Rochester, MN. Manual tracing.	Yes

J a c k 2 0 0 5	91 controls, 72 MCI, follow up 1-2 ys.	72	Peterson criteria	Unk	1.5 T GE: 3D T1 SPGR.	Spatial registration of scan 2 to scan 1. Manually trace hippocampus.	Yes
J a c k 2 0 0 0	58 control, 43 MCI, 28 AD. Follow up 3 ys.	43	Peterson criteria + CDR 0.5	DSM IIIR + NINCDS	1.5 T GE: 3D T1 SPGR, 124 continuous partitions, 1.6 mm slice thickness, FOV: 22 × 16.5 cm, 192 views, and 45 ° flip angel.	Manual tracing. Imaging data interpolated inplane equivalent to matrix 512 × 512 and magnified 2X. Volume converts to W score.	Yes
J a c k 1 9 9 9	80 MCI follow up 32.6 month	80	Peterson criteria incl. 1.5 SD below on cog test + CDR 0.5	CRR0.5	1.5 T GE: 3D T1 SPGR, 124 continuous partitions, 1.6 mm slice thickness, FOV: 22 × 16.5 cm, 192 views, and 45 ° flip angel.	Manual tracing. Imaging data interpolated inplane equivalent to matrix 512 × 512 and magnified 2X. Volume converts to W score.	Yes
K a n t	54 normal, 21 aMCI. Follow up 36-42 months	21	aMCI meet criteria of Peterson.	DSM IIIR + NINCDS	1.5 T GE: 3D T1 SPGR.	Manual tracing. Volumes convert to W scores	Yes

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

a r c i 2 0 0 5							
K i l l a n y 2 0 0 2	18 control, 94 questionable AD, 16 AD.	94	CDR 0.5	CDR1 + NINCDS	1.5 T GE T1 2D coronal: TR/TE = 35/5 mse. Filp angel: 45 °, FOV: 22 cm, matrix 256 × 256, slice thickness: 1.5 mm.	Hippocampus was manually drawn after normalization process in standard coronal plane.	Yes
L a n d a u 2 0 1 1	193 AD, 229 normal, 28 MCI converter, and 57 MCI nonconverters. Follow up to 36 months.	85	CDR 0.5; MMSE 24- 30; 1.5-2.0 SD below age adjusted norms on LM IIADAS- cog 11	NINCDS Consens us	1.5 T multiple ADNI site with standardized MRI protocol	FreeSurfer software. More info in appendix e1 on neurology	Unk

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

0							
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N							
I							
L	200 control, 335 MCI, 147 AD. Follow up 12 months.	335	CDR 0.5; MMSE 24-30; 1.5-2.0 SD below age adjusted norms on LM II	NINCDS ; loss of function based on GDS or SDCS-ADL	1.5 T GE, Philips, Siemens: T1 weighted TR/TE/TI: 2400/3.5/1000 mse, flip angle = 8°. 160 or 180 sagittal, slice thickness 1.2 mm. matrix 192 × 192 or 256 × 256 with voxel resolution 1.25 × 1.25 × 1.2 mm, or 0.95 × 0.95 × 1.2 mm.	ADNI MR imaging protocol: postacquisition correction of gradient warping, B1 non-uniformity correction depending on the scanner and coil type, intensity non-uniformity correction and phantom based scaling correction - the geometric phantom scan have been acquired with each patient scan.	Yes
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S	35 normal controls, 33 aMCI, 14 probable AD. All follow up to 5ys.	33	LM II	NINCDS	1.5 T GE Signa scanner: 3D SPGR 124 contiguous 1.5 mm slice thickness in coronal plane (TR/TE: 33.3/7 mse). FOV: 22 cm, matrix: 256 × 192. Flip angle = 35°, signal average = 1.	Analyze software package (Mayo Clinic Foundation, Rochester, MN). Manual volumetry.	Yes
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Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

0							
T a p i o l a 2 0 0 8	excluded						
V i s s e r 1 9 9 9	20 normal, 18 minimal dementia, 7 demented. All follow up to 3 ys.	18	Not meet DSM IIIR for dementia but with cognitive deficits.	NINCDS	0.6 T Teslacon II: 2D T1 coronal (TR/TE: 300/22 mse) in-plane resolution 0.8 × 1.0 mm. 6 coronal slices, 5 mm slice thickness with 1.0 mm gap.	Manual with 0.5mm slice thickness and 1mm between slices. Volumetry quantified via SUN workstation with software developed in house	Yes
V i s	excluded						

Qualification opinion of low hippocampal volume (atrophy) by MRI for use in Regulatory Clinical Trials - in Pre-dementia stage of Alzheimer's disease

s e r 2 0 0 2							
W a n g 2 0 0 9	excluded						
W h i t w e l l 2 0 0 8	21 aMCI-S (monitor > 18 months), 42 aMCI-P (monitor > 3 ys).	63	1-1.5SD below norms on at least one: LM II, AVLT, FCSRT,	NINCDS	No scanner info: 3D T1 coronal volumetric SPGR, 124 contiguous 1.6 mm thickness. FOV: 22 × 16.5 or 24 × 18.5 cm. flip angel: 25 °.	VBM using SPM2 (http://www.hip.ion.ucl.ac.uk/spm)	Yes

791

792 **CHMP/SAWP question**

793 **You will need to mention in particular the studies that have used the**
 794 **Dubois's criteria as evidence for the qualification.**

795 **Applicant's response**

796 Dubois et al., (Research criteria for the diagnosis of Alzheimer's disease: revising the NINCDS-ADRDA
 797 criteria. Lancet Neurol. 2007 Aug; 6(8):734-46) specified new research criteria for AD (Alzheimer's
 798 disease) to define early onset patients that now are termed "prodromal AD". The recent attention to
 799 prodromal AD in the AD research community is aimed at facilitating clinical trials in patients at a stage
 800 when interventions will have the best chance of success. Such definitions continue to evolve, yet the
 801 working definition of the Dubois criteria is that patients have some cognitive level of impairment that
 802 does not yet impair their daily activities, in addition to showing at least one or more of the supportive
 803 biomarker signatures consistent with the pathology of AD. More specifically, the clinical definition
 804 includes a core diagnostic criteria consisting of three items: subjective memory complaint lasting in
 805 excess of six months, an episodic memory abnormality, preferably on a delayed recall measure, and
 806 lastly, the presence or absence of other cognitive domain abnormalities. Patients fulfilling these criteria
 807 would be classified as having probable AD in the prodromal stage (pre-dementia).

808 Table 1 below specifies the published studies that satisfy the criteria of patients with cognitive
 809 impairment in addition to testing positive for at least one AD biomarker, in this case structural MRI, to
 810 assess medial temporal lobe atrophy. Such studies have been indicated under the column heading,
 811 "Episodic Memory Deficit and Biomarker" with an "X".

812
 813

Table 1:

Study	Episodic Memory Deficit and Biomarker	Used other Criteria (specify which criteria used)
Bakkour A 2009		CDR* 0.5
Convit, A 2000	X	
Desikan RS 2009	X	
Desikan RS 2008	X	
Devanand DP 2007	X	
Eckerstrom C 2008	X	
Fellgiebel A 2006	X	
Fleisher AS 2008	X	
Galluzzi S 2010	X	
Galton CJ 2005		CDR* 0.5
Henneman WJP 2009	X	
Herukka SK 2008	X	
Jack CR 2010	X	
Jack CR 2008	X	
Jack CR 2005	X	
Jack CR 2000	X	
Jack CR 1999	X	

Study	Episodic Memory Deficit and Biomarker	Used other Criteria (specify which criteria used)
Kantarci K 2005	X	
Killiany RJ 2002		CDR* 0.5
Landau SM 2010	X	
Leung KK 2010	X	
Stoub TR 2010	X	
Tapiola T 2008	X	
Visser PJ 1999	X	
Visser PJ 2002	X	
Wang PN 2009	X	
Whitwell JL 2008	X	

*Clinical Dementia Rating scale

CAMD thus posits that the majority (24 of 27 total) of the submitted articles selected their patients on a basis that is similar, if not identical, to the Dubois criteria. Note that the Dubois paper was published in 2007, after the majority of the studies had begun; therefore, it was not necessarily possible for most of the authors to specify that they were adhering to the as yet unpublished Dubois criteria. On an examination of the submitted research papers, most subjects were included on the basis of an objective cognitive loss, i.e., episodic memory impairment plus hippocampal volume as the biomarker. The remaining three citations refer to the use of CDR (Clinical Dementia Rating scale) as the clinical diagnostic approach. The CDR scale does measure memory, including delayed memory, however the results are not typically calibrated to a standard deviation below the mean as suggested by Dubois; therefore, these studies are noted separately in the table as "CDR 0.5". In summary, CAMD's understanding of the presented studies is that the majority of the citations included in the submission dossier (listed in Table 1) are in line with Dubois' published criteria for diagnosis as prodromal AD.

CHMP/SAWP question

"In published cohorts in which other biomarkers were involved, what was the predictive value of the different biomarkers for an indication and population similar to those intended in this submission, and particularly the positive and negative predictive value of the MRI hippocampal volume in comparison to others more easily to standardize (eg. CSF biomarkers) or likely related (MRI volume of entorhinal cortex and amygdala) or in a combination approach?"

Which were the time to conversion to probable AD, percentage of converters in a particular timing? Which was the expected rate of conversion to AD in those groups studied by the biomarkers in comparison with a population not fulfilling such criteria?"

Applicant's response

There are several biomarkers that are currently being used for the purpose of enrichment of clinical trials in early AD subjects, including biochemical assessment of CSF A β 42, tau and p-tau levels, PET imaging of amyloid, metabolic activity (FDG PET), cerebral perfusion (SPECT) and structural neuroimaging. Each biomarker has advantages and disadvantages in terms of ease of use, cost and invasiveness to patients. Relative to the other biomarkers, vMRI (volumetric magnetic resonance

imaging) has the advantage of being noninvasive and has widespread applicability. In comparing vMRI to other biomarkers, the hippocampal volume is a well-established biomarker for predicting conversion from prodromal AD to AD dementia and the only known biomarker that correlates with cognitive decline during the course of disease progression. While the research field has expressed interest in the application of amyloid PET imaging as another tool to assist with patient selection in early AD trials, the requirement for radiotracer administration, challenges with quantification, and the lack of change of amyloid signal with disease progression and conversion makes this approach less appealing. At present, the field is not yet at a stage to employ combinatorial imaging biomarker measurements beyond research purposes as highlighted in a recent webinar focused on early AD biomarkers (<http://www.alzforum.org/res/for/journal/detail.asp?liveID=192>).

Quantitative measures of the hippocampus are the most relevant as compared to other brain regions in AD brain. The hippocampus plays an important role in the consolidation of information from short-term memory to long-term memory. Indeed, human subjects with lesions of the hippocampus show anterograde amnesia. While other brain regions do exhibit volumetric reductions in AD patients as a result of widespread neuronal loss, these regions, such as the amygdala, do not subserve memory functions and neuronal loss and atrophy occurs later in the course of the disease. Furthermore, regions such as the amygdala and entorhinal cortex are more challenging to measure in standard MRI acquired images, show greater inter-subject variability and are far less standardized than hippocampal measurements. In summary, at a comparative level, standardization and harmonization of vMRI hippocampal measurements are further advanced than is currently possible with CSF (cerebrospinal fluid) or other biomarkers.

In addition to providing an extensive literature review in support of our proposed context of use, CAMD performed a *de novo* analysis of the performance of hippocampal volume from publically available data from the Alzheimer's Disease Neuroimaging Initiative (ADNI). The US National Institutes of Health's (NIH) largest public-private partnership on brain research, ADNI tracks normal, "mildly cognitively impaired" (MCI), and Alzheimer's disease brain changes to measure disease progression. ADNI contributing members include the NIH, 20 pharmaceutical companies and two non-profit organizations. ADNI is using MRI and PET imaging, as well as laboratory and cognitive testing, of 821 normal, mildly cognitively impaired, and Alzheimer's disease patients. Among the goals of the study is to provide better tools for carrying out effective clinical trials and identifying biomarkers that can predict clinical outcome. ADNI has been extended to now include similar efforts in Europe (Pilot E-ADNI) and other sites worldwide (Japan, Australia). In 2010, the ADNI study was provided continued support to focus on participants with very early stages of memory loss (ADNI Go). Because of the large sample size, scientific rigor with which the data were collected, public availability, and inclusive use of biomarkers, CAMD members selected this dataset as the dataset upon which to base our biomarker analysis and comparison to literature described in the submission dossier.

At present, there are four published image analysis quantification methodologies (LEAP, NeuroQuant, FreeSurfer, and HMAPs) suitable for assessing hippocampal volume in standardly acquired MRI images. Table B, below (data presented to the SAWP on 25 August 2011), represents a comparison of the *de novo* analysis of ADNI baseline vMRI of the hippocampus showing the ROC (Receiver Operating Characteristic) results {as AUC (Area Under the Curve) value} from the four methodologies, with the published literature accepted for the review for which AUC data are available. The four different methodologies yield very similar (not significantly different) results and, taken together, are also similar to the published literature, with regard to patient populations, study length, vMRI acquisition, and reported AUC.

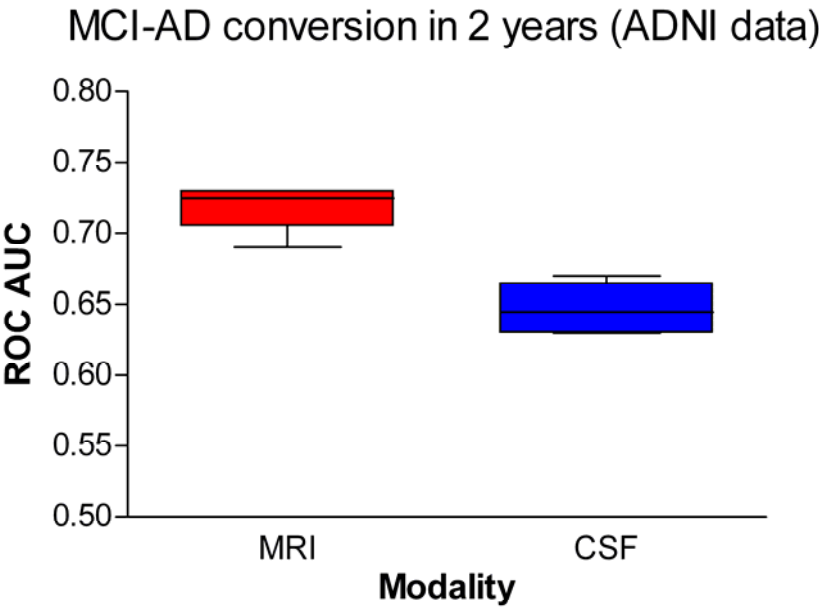
891

Table B			
Comparison between published and de novo ADNI analysis			
	Study	N training/testing	ROC AUC
De Novo ADNI data	LEAP	149/173	0.7565
	NeuroQuant	149/173	0.7516
	FreeSurfer	148/171	0.7536
	HMAP	128/161	0.7290
Reported AUC from published literature	Bakkour	49	0.65
	Devanand	139	0.77
	Fleisher	129	0.604
	Galluzzi	90	0.73

892

893 Table B. Comparison between published and de novo ADNI analysis. Differences in number of subjects
894 (N) in training and testing subsets across the four ADNI studies are due to the specifics of the
895 methodology requirements for these four analyses (i.e., LEAP, NeuroQuant, FreeSurfer, HMAP).

896 The SAWP requested further information comparing the performance of CSF and hippocampal volume
897 in predicting conversion to AD. For this comparison, as originally presented to the SAWP on 29 June
898 2011, CAMD performed an additional analysis of the ADNI dataset and reported the results of
899 progression at the two year time point (Figure 1, below). Comparison of the AUC values of baseline
900 vMRI of hippocampus and CSF analytes ($A\beta$; Phospho- τ ; Total τ ; single and combined) indicate that
901 vMRI in this dataset is as good as, or slightly better at, predicting conversion to AD than CSF analytes;
902 specifically, a greater ROC AUC was observed for MRI than CSF biomarkers in this comparison.



903

904 Figure 1: Comparison of AUC values of baseline vMRI data predicting conversion to AD to AUC values
905 of CSF analytes predicting conversion to AD in 2 years. The MRI range= 0.69—0.73 and CSF range=
906 0.63—0.67 { $A\beta$ =0.67; Phospho- τ = 0.66; Total τ =0.63; All (linear comb.) = 0.63}.

907

908

CHMP Qualification opinion

Low hippocampal volume, as measured by MRI and considered as a dichotomized variable (low volume or not), appears to help enriching recruitment into clinical trials aimed at studying drugs potentially slowing the progress/conversion to AD dementia of the included subjects. Low hippocampal volume might be considered a marker of progression to dementia in subjects with cognitive deficit compatible with predementia stage of AD (Dubois 2007). However, neither the actual value of low hippocampal volume to accurately predict rate of such progression to dementia in the referred subjects nor the relative value of other biomarkers have been reported.

As currently planned in the current opinion subjects might be included in the studies based on clinical criteria and low hippocampal volume biomarker (if positive). The CHMP has given a previous positive opinion in the predementia stage of Alzheimer's disease: cerebro - spinal fluid related biomarkers for drugs affecting amyloid burden. This may lead first to a heterogeneous population and, moreover, it will not be possible to explore the relationship among them. Although not required from a regulatory perspective, the concomitant assessment of the two biomarkers in predementia stage of AD would be of great value.

The process of measurement of low hippocampal volume is also complex. To obtain reliable results implies the standardization of all steps (at least imaging acquisition protocol, imaging reconstruction/analysis methods, timing to conversion, etc). International guidelines have been produced. These guidelines must be enforced.

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