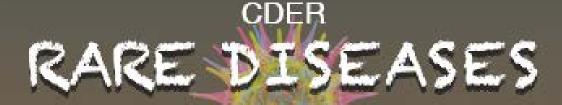




HOSTED BY
PROFESSIONAL AFFAIRS AND
STAKEHOLDER ENGAGEMENT (PASE)



30TH OCT Public Workshop

8AM. TO 5PM.

CDER-Rare-Diseases-Public-Workshop.Eventbrite.com

Strategies, Tools, and Best Practices for Effective Advocacy in Rare Diseases Drug Development WO I Building 31 (Great Room)





Strategies, Tool, and Best Practices for Effective Advocacy in Rare Diseases Drug Development

FDA White Oak Campus

Building 31, Great Room (A, B, C)



WELCOME & INTRODUCTIONS

Welcome and Introductions: Francis Kalush, Ph.D.

Global Genes Introduction: Meredith Cagle, M.P.H.

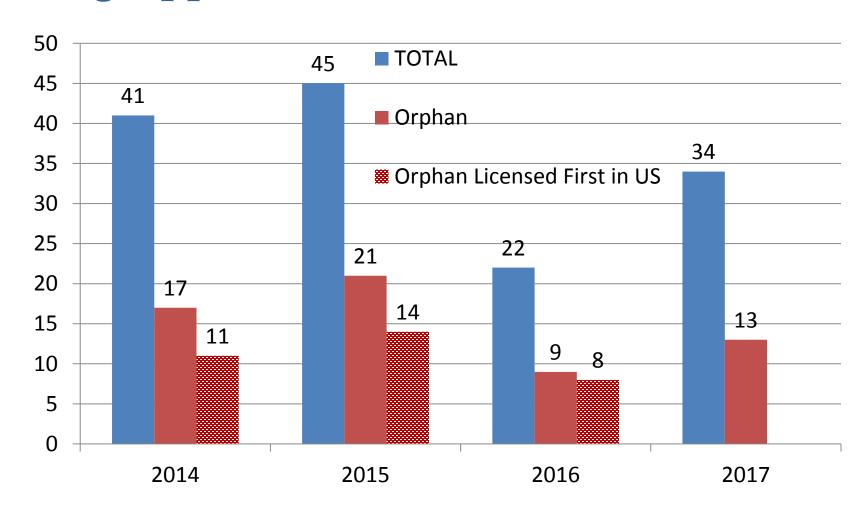
FDA Opening Remarks: Douglas Throckmorton, M.D.



Welcome & Introductions FRANCIS KALUSH, PH.D.



CDER Novel Orphan Drug Approvals CY 2014 -2017*



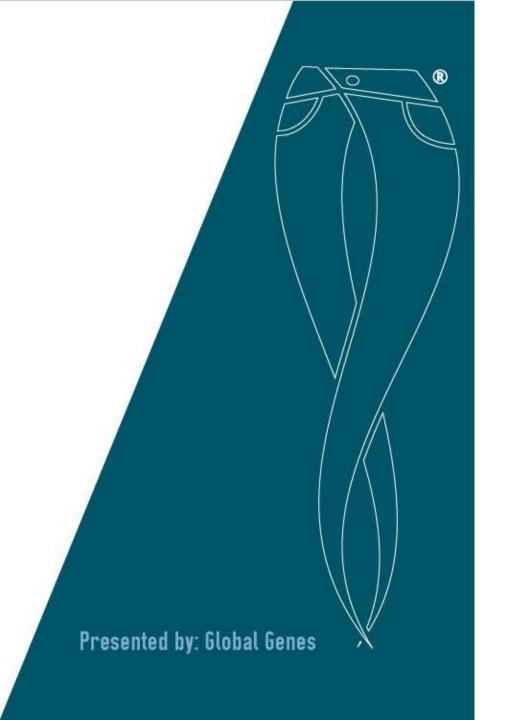
^{*} as of 07 October 2017



Global Genes Introduction MEREDITH CAGLE, M.P.H.



Our Mission: To eliminate the challenges of rare disease



Patient Engagement Team





Meredith Cagle
Director, Patient Engagement



Kendall DavisSr. Manager, Corporate and Foundation Alliances



Amy GroverSr. Manager, Patient Engagement



Ashley YeeSr. Manager, Education Programs





- ➤ We develop resources and tools to help equip patient advocates to become successful ACTIVISTS for their disease
- ➤ We are building a globally connected network, a platform for collaboration and success
- ➤ We fund Science and Technology innovations that will broadly impact patients within their lifetime





THIS IS WHY GLOBAL GENES WAS FOUNDED





RARE DISEASE AFFECTS MORE THAN MILLION PEOPLE WORLDWIDE



APPROXIMATELY DEBILITATING DISEASES WILL NOT LIVE TO SEE THEIR 5TH BIRTHDAY.



APPROXIMATELY 80% OF RARE DISEASES ARE GENETIC.



50% OF PEOPLE AFFECTED
BY RARE DISEASE
ARE CHILDREN





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Advocacy to Activism



WHAT WE DO

WE EDUCATE & BUILD AWARENESS

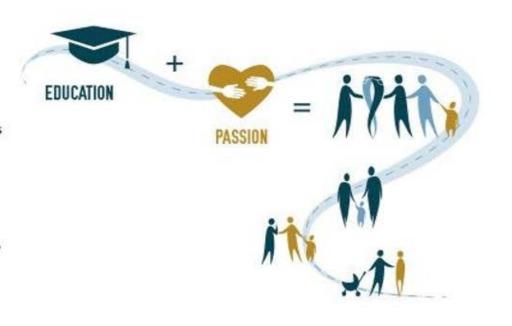
- · Developing tools to aid rare disease advocates
- Equipping patients to become successful disease activists

WE COLLABORATE AND EMPOWER

 Building bridges between patients, advocates, clinicians and corporate partners

WE FOSTER INNOVATION

 Funding research that impacts rare disease patients in their lifetime







RARE Patients Responsibilities - Landscape



Living with a Life Limiting or Chronic Condition



Architects of Future Health: Individual & Community

Patients as Partners and Drivers





Expectations for Today's Meeting



www.fda.gc



THANK YOU!



www.globalgenes.org





FDA Opening Remarks Douglas Throckmorton, M.D.







WHAT IS THE FDA AND WHO IS INVOLVED WITH RARE DISEASES ENGAGEMENT?

Moderator: Francis Kalush, Ph.D.

Introduction To FDA: Heidi Marchand, Pharm. D.

FDA Orphan Medical Product Designation Program: Gayatri Rao, M.D., J.D.

CDER Divisions Working With Rare Diseases: Jonathan Goldsmith, M.D.

Professional Affairs And Stakeholder Engagement Within CDER:

John Whyte, M.D., M.P.H.



Moderator: FRANCIS KALUSH, PH.D.



Introduction to the FDA HEIDI MARCHAND, PHARM.D.



FDA Overview and Introduction



Heidi C. Marchand, PharmD Office of Health and Constituent Affairs October 30, 2017

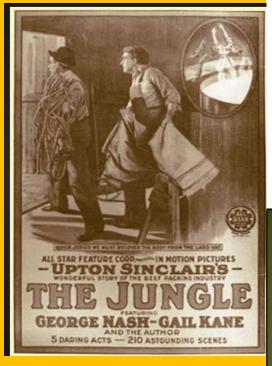


FDA's Public Health Mission

- Ensure the safety, effectiveness, and security of human and animal drugs, biological products and medical devices
- Ensure the safety of foods, cosmetics, and radiation-emitting products
- Regulate tobacco products



1906 Pure Food and Drug Act





Impact of *The Jungle*

Meat Inspection Act

Required federal inspection of meat and required the Agricultural Department (USDA) to set standards of cleanliness in meatpacking plants

Pure Food and Drug Act

Banned the sale of impure or falsely labeled food or drugs



FDA's Product Centers







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FDA Commissioner-Dr. Scott Gottlieb

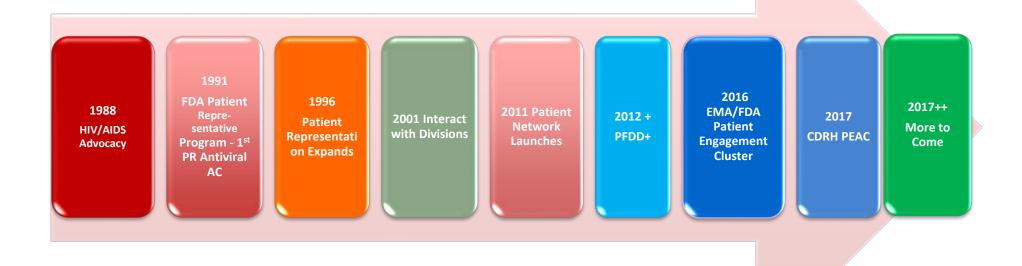


Our preference is for patient groups to interface directly with the review programs. –October 2017

24



FDA Patient Involvement Milestones



25



Patient-Oriented Offices and Staff

Office of the Commissioner

- Office of Health and Constituent Affairs
- Office of Orphan Products Development
- Office of Women's Health
- Office of Minority Health

Human Therapeutic Centers

- Drugs
 - Professional Affairs and Stakeholder Engagement
 - Rare Disease Program
 - Patient Focused Drug Development
- Biologics
- Devices
 - Patient Engagement Advisory Committee



Why is the Patient Voice Important?

- Provide insight on issues, problems, and/or questions that are important to patients and family members
- Patients have a vested interest diversity of opinions
- Varied perspectives, both in terms of risk tolerance and potential benefit
- The human element (judgment vs. empirical data)

Ultimately, patients are the focus of all of FDA's activities





What Value Can Patient Engagement Add?

- Better designed trials
- Faster recruitment and improved retention
- Cutting time and cost of product development
- Help develop meaningful endpoints and measurements
- Contribute valuable data patient and natural history registries
- Medical products that better reflect outcome and quality of life measures most important to patients





FDA Patient Representative Program

- Began in 1990s
- Patients having an active role on FDA Advisory Committees and consultations with review divisions
- Patient voice represented in important discussions about regulatory decision-making

Presence at the table



FDA Patient Representatives





- Patients with a disease/condition
- Primary caregivers to patients (i.e., spouse, parent, family member, friend)
- Members of patient/community advocacy groups
- Special Government Employees

Patient Representatives

201 Reps | 300 diseases/conditions | 60 assignments/year

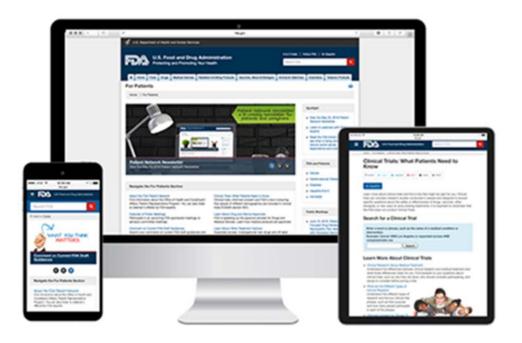
- AIDS/HIV
- Alzheimer's Disease
- Asthma
- Cancer (various)
- Cardiovascular disease
- Cerebral Palsy
- Crohn's disease
- Cystic Fibrosis
- Depression
- Diabetes
- Duchenne Muscular Dystrophy
- Fabry Disease
- Hepatitis B
- Hepatitis C
- Hypertension/Cardiovascular Disease

- Infantile Spasms
- Lung Transplantation
- Lupus
- Macular Degeneration
- Major Depressive Disorder
- Multiple Sclerosis
- Neuropathy
- Lysosomal Acid Lipase
- Obesity/Weight Control
- Parkinson's Disease
- Pompe Disease
- Polio
- Sickle Cell Disease
- Short Bowel Syndrome
- Temporomandibular joint (TMJ) disorder
- Urea Cycle Disordeg₁



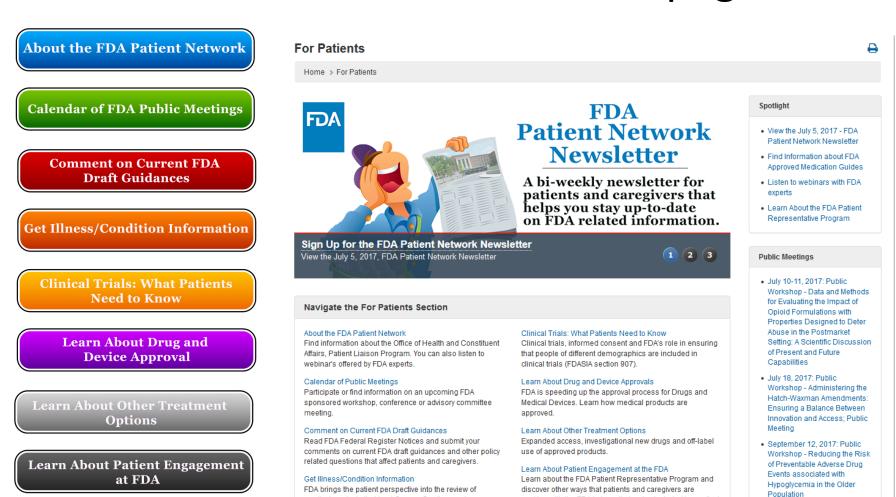
FDA Patient Network

- Webpage
- Webinars & In-person Meeting's
- Twitter
- Bi-weekly Email
 Newsletter





FDA Patient Network- Webpage



working with the FDA to have their voice included in medical

product approvals and FDA policy.

medical products that treat Cancer, Cardiovascular

illnesses.

disease, Diabetes, Hepatitis B & C, HIV/AIDS and other

www.fda.gov/ForPatients



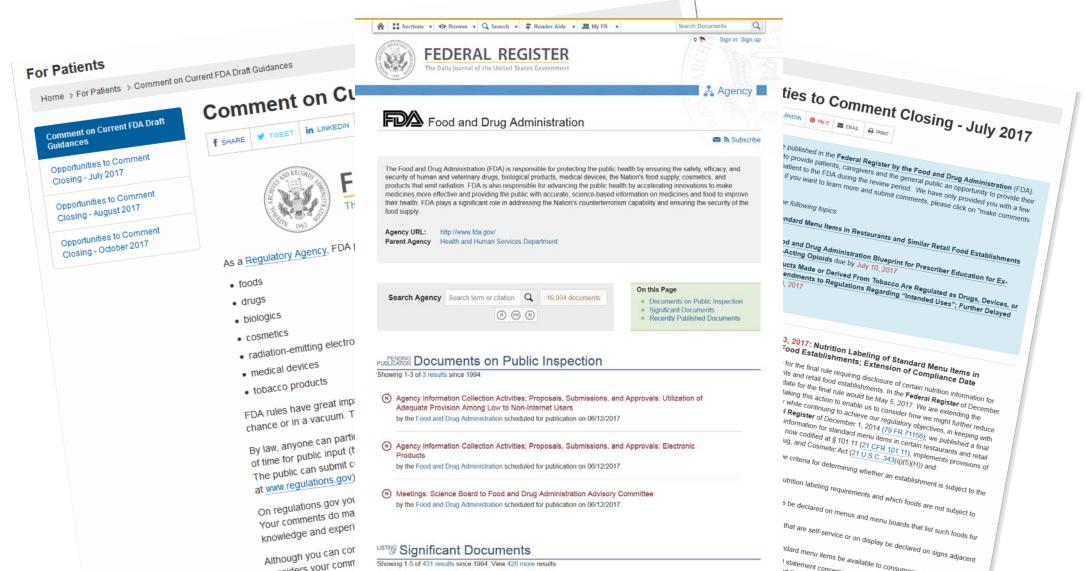
FDA Patient Network- Newsletter



www.FDA.gov/ForPatients



Submit Comments Through the Federal Register



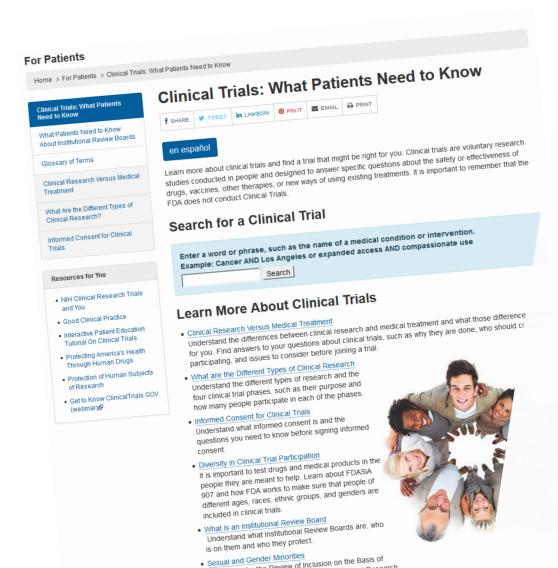


Participate in an FDA Sponsored Public Meeting

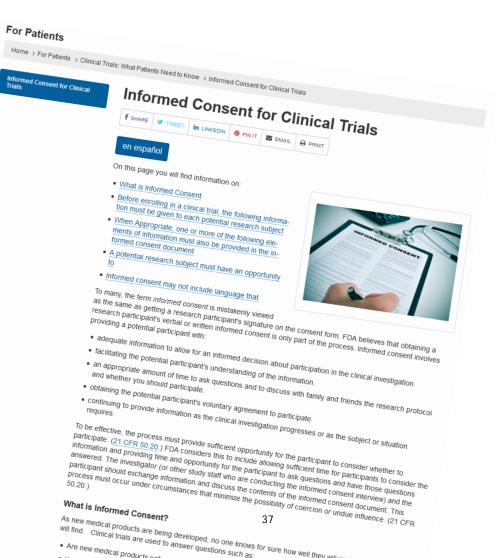




About Clinical Trials – Information for Patients

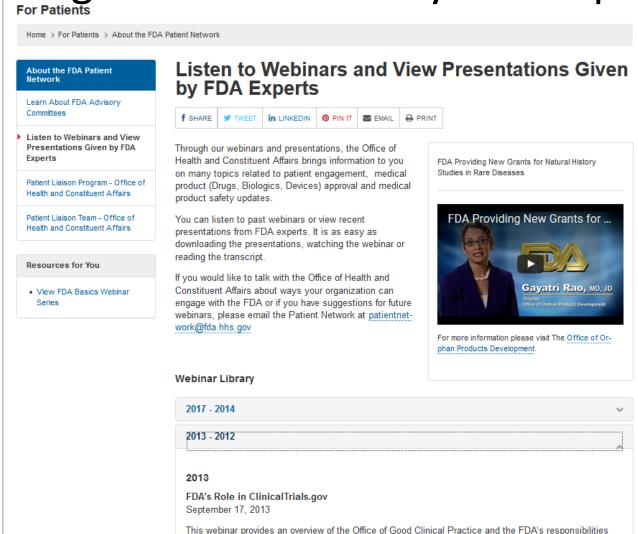


for the Review of Inclusion on the Basis of





Training Webinars Lead by FDA Experts



with ClinicalTrials.gov.

Listen to Webinar | Transcript



FDA Facebook





FDA Patient Network Twitter





And 19 additional FDA Twitter accounts to follow for up-to-date information



Resources











Thank you!



heidi.marchand@fda.hhs.gov



FDA Orphan Medical Product Designation Program GAYATRI RAO, M.D., J.D.

www.fda.gov 43



An Overview: Office of Orphan Products Development

Gayatri R. Rao, M.D., J.D.

Director, Office of Orphan Products Development
October 30, 2017



What is an "Orphan Product"?

- Product that is used to treat, diagnose, or prevent a "rare disease or condition" and includes:
 - Drugs e.g., Radicava (edaravone) for amyotrophic lateral sclerosis (ALS)
 - Biologics e.g., Spinraza (nusinersen), for spinal muscular atrophy (SMA)
 - Medical Devices e.g., Argus II Retinal Prosthesis System "bionic eye" to treat eyes diseases such as macular degeneration and retinitis pigmentosa
 - Medical Foods e.g., Low phenylalanine diet for PKU



What is a "Rare Disease"?

- Defined by law and is different for drugs/biologics and devices
 - Drugs/Biologics: Disease with a prevalence of <200,000 in US (generally)
 - Devices: Disease with an incidence of <8,000/year in US
- Definition varies globally; for drugs/biologics:
 - EU: < 5 per 10,000
 - Japan: < 50,000 (4 per 10,000)</p>
- Examples include Cystic Fibrosis, Duchene's Muscular Dystrophy, ALS

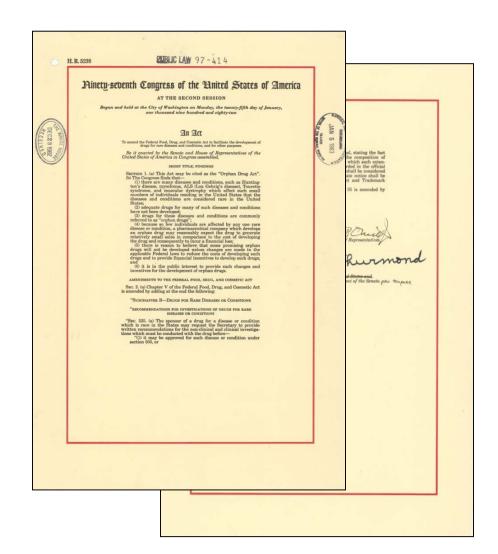


Challenges to Rare Disease Product Development

- Difficulty diagnosing patients
- Small (often *very* small), widely-dispersed patient population
- Natural history of the disease not well understood
- Identifying appropriate biomarkers & surrogate endpoints
- Multiple, different, global regulatory requirements



Orphan Drug Act (ODA)



Created incentives for orphan drug development, including:

- Orphan Drug Designation Program
- Orphan Products Grants Program

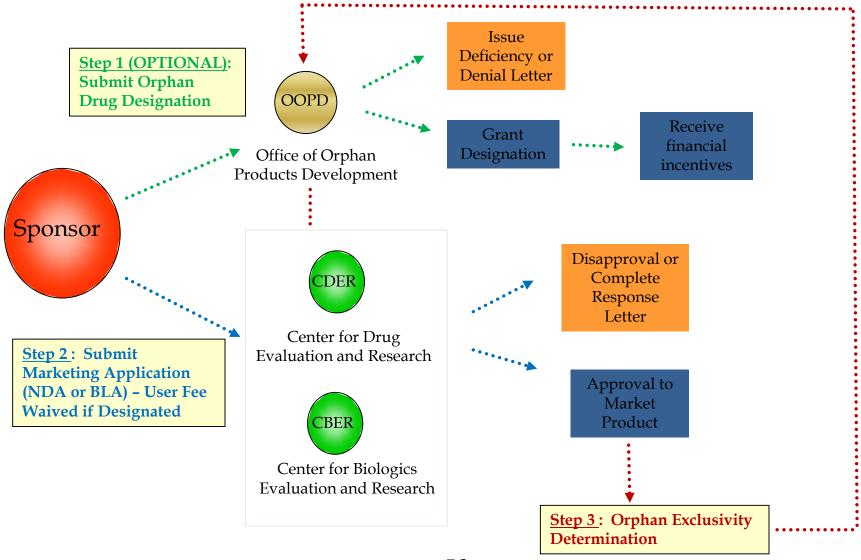


Financial Incentives Associated With Orphan Drug Designation

- 1. Receive 50% of clinical trials costs in tax credits
- 2. Receive a <u>waiver</u> of marketing application fees (~\$2M)
- 3. Eligible to receive <u>7-years of marketing exclusivity</u> ("orphan exclusivity")
 - FDA will not approve another "same drug" for that rare disease for 7 years

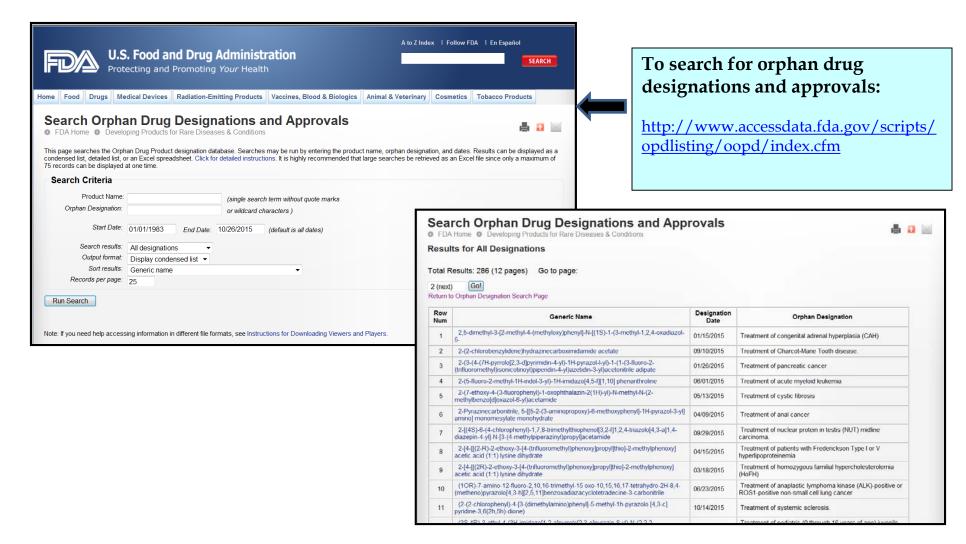
Process







Public Database





OOPD Core Programs

<u>Mission</u>: To promote the development of drugs, devices, biologics, and medical foods for patients with rare diseases and special populations

DESIGNATION PROGRAMS		
1	Orphan Drug Designation & Exclusivity	
2	Rare Pediatric Disease (RPD) Designation • New definition- disease or condition must be rare and its serious or life-threatening manifestations must occur in individuals 18 years and younger • Co-administer with Office of Pediatric Therapeutics as of May 15, 2017 • Part of the RPD Priority Review Voucher Program	
3	 Humanitarian Use Device Designation (HUD) Part of the HUD/HDE pathway Disease or condition is not more than 8,000 individuals in the US per year 	

GRANT PROGRAMS			
1	\$15M Orphan Products Clinical Trials Grant Program • Funding and monitoring 85 rare disease clinical trials		
2	 \$6M Pediatric Device Consortia Grant Program Appropriations increased from \$3M to \$6M in FY2017 Funding and monitoring 7 different consortia 		
3	\$2M Orphan Products Natural History Grant Program • NIH providing additional \$3.5M to fund total of 6 studies		



Approval Standard

- Approval Standard for Drugs Substantial evidence of safety and effectiveness
 - Generally means 2 well-controlled clinical trials
- Approval Standard for Orphan Drugs Same standard of approval...

"While the statutory standards apply to all drugs, the many kinds of drugs that are subject to the statutory standards and the wide range of users for those drugs demand flexibility in applying the standards. Thus FDA is required to exercise its scientific judgment to determine the kind and quantity of data and information an applicant is required to provide for a particular drug to meet the statutory standards."

- 21 CFR 314.105(c)





For more information on Orphan Drug Designation and other OOPD programs go to:

www.fda.gov/orphan

Still have questions?

Email us at orphan@fda.hhs.gov

Call us at 301-796-8660



CDER Divisions Working with Rare Diseases JONATHAN GOLDSMITH, M.D.

www.fda.gov 55



Center for Drug Evaluation and Research: Drug Development in the Rare Disease Space

Jonathan C. Goldsmith, MD, FACP

Associate Director, Rare Diseases Program OND/CDER/FDA

CDER Rare Disease Public Workshop 30 October, 2017



Disclosures

- No conflicts of interest
- Nothing to report
- Opinions expressed are personal and may not reflect those of the FDA



Center for Drug Evaluation and Research

Office of the Center Director

Office of Regulatory Affairs	Office of Medical Policy
Office of Communications	Office of Management
Office of Strategic Programs	Office of Compliance

- Office of Translational Sciences
- Office of Surveillance and Epidemiology
- Office of New Drugs
 - Immediate Office of the Director
 - Rare Diseases Program
- Office of Generic Drugs
- Office of Pharmaceutical Quality

Office of New Drugs (OND)



- Office of Drug Evaluation I
 - Division of Cardiovascular and Renal Products (DCaRP)
 - **Division of Neurology Products (DNP)**
 - Division of Psychiatry Products (DPP)
- Office of Drug Evaluation II
 - Division of Anesthesia, Analgesia, and Addiction Products (DAAAP)
 - Division of Metabolism and Endocrinology Products (DMEP)
 - Division of Pulmonary, Allergy, and Rheumatology Products (DPARP)
- Office of Drug Evaluation III
 - Division of Dermatology and Dental Products
 - Division of Gastroenterology and Inborn Errors Products
 - Division of Bone, Reproductive and Urologic Products (DBRUP)
- Office of Drug Evaluation IV
 - Division of Medical Imaging Products
 - Division of Nonprescription Drug Products (DNDP)
 - Division of Pediatric and Maternal Health (DPMH)
- Office of Antimicrobial Products
 - Division of Anti-Infective Products (DAIP)
 - Division of Transplant and Ophthalmology Products (DTOP)
 - Division of Antiviral Products (DAVP)
- Office of Hematology and Oncology Drug Products
 - **Division of Oncology Products 1 (DOP 1)**
 - Division of Oncology Products 2 (DOP 2)
 - Division of Hematology Products (DHP)
 - Division of Hematology Oncology Toxicology (DHOT)



Challenges for Rare Disease Drug Development

- Natural history is often poorly understood/characterized
- Diseases tend to be progressive, serious, life-limiting and lifethreatening and lack approved therapy
- Small populations often restrict study design and replication
- Phenotypic (disease presentation) diversity within a disorder adds to complexity, as do genetic subsets
- Well defined and validated endpoints, outcome measures/tools, and biomarkers are often lacking
- Lack of **precedent** for drug development
- Ethical considerations for children in clinical trials





- ✓ Substantial evidence of **effectiveness** for treatment of the proposed indication
- ✓ Demonstration that the benefits of the drug outweigh its **risks** for the patient population for which the drug is indicated (21CFR 314.50)
- ✓ **Manufacturing** that ensures product identity, strength, quality (purity)
- ✓ Evidence-based drug **labeling** that adequately guides providers and patients to use the drug safely and effectively





Special standards for orphan drugs are not needed because the regulations (21 CFR 314) provide for **flexibility** and **judgment** in applying the standards

11/1/2017



How does CDER apply flexibility?

Flexible approaches can include:

- Approval supported by fewer than 2 adequate and wellcontrolled studies
- Use of the accelerated approval pathway
- Use of novel trial end points
- Use of non-concurrent controls
- CDER reviewers play a major role in helping sponsors "get it right the first time"

11/1/2017



There are two approval pathways

traditional (regular or "full") approval and

accelerated approval

the statutory standards are the same for both



demonstration of substantial evidence based on adequate and well-controlled clinical study(ies)

11/1/2017





- Randomize early in development to avoid potentially misleading, uninterpretable findings in open-label trials
- Explore ways to **limit time on placebo** for serious diseases with no approved therapy (e.g., dose-response, delayed start, randomized withdrawal, interim analysis)

11/1/2017 65



The 21st Century Cures Act (P.L.#114-255) Patient Focus

- This new law recognizes the unique position of patients to provide essential insights about what it is like to live with and fight their disease
- This has been FDA's perspective as well, and it is why FDA has continued to advance the science of patient input through patient-focused drug development programs
- "Cures" will enhance these ongoing efforts to better incorporate the patient's voice





Respected experts in the stakeholder organization disease Roles and Responsibilities:

*Ensure that the stakeholder organization can interact effectively with granting agencies, researchers, regulators and commercial drug developers

*Provide balanced expertise on potential drug development initiatives from industry and academia

*Provide oversight and scientific evaluation of potential research projects to be funded by or contributed to by the stakeholder organization

*Present disease specific scientific/medical updates to the stakeholder Board of Directors 17

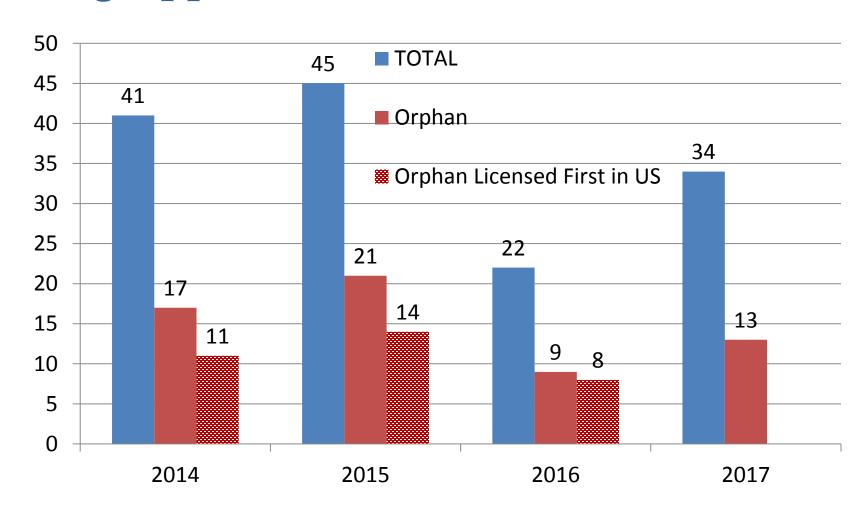




- Meetings have been well organized and executed
- Patient/family perspectives in support of drug development and evaluation were effectively communicated
- Panel members and other contributors provided clear perspectives on clinically meaningful treatment(s) and the current therapeutic landscape
- *Voice of the Patient* reports have been written and distributed



CDER Novel Orphan Drug Approvals CY 2014 -2017*



^{*} as of 07 October 2017



Thank you very much for your attention! Questions?

Jonathan.Goldsmith@fda.hhs.gov

Rare Diseases Program/OND/CDER/FDA

CDERONDRareDiseaseProgram@fda.hhs.gov



Professional Affairs and Stakeholder Engagement with CDER JOHN WHYTE, M.D., PH.D

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Questions and Answers

www.fda.gov



BREAK TIME

10:25 - 10:45 A.M.







TYPES OF PATIENT ENGAGEMENT WITH CDER AT FDA

Moderator: Francis Kalush, Ph.D.

Overview of CDER Patient Engagement and Interactions:

Douglas Throckmorton, M.D.

Externally-led Patient-Focused Drug Developed Meetings:

Meghana Chalasani

CureSMA Early Engagement and PFDD Meeting with FDA:

Rosangel Cruz, M.A.

Experience with Patient Engagement in Neurology: Billy Dunn, M.D.



Moderator: FRANCIS KALUSH, PH.D.



Overview of CDER Patient Engagement with CDER at FDA DOUGLAS THROCKMORTON, M.D.



Externally-led Patient-Focused Drug Development Meetings MEGHANA CHALSANI





Externally-led Patient-Focused Drug Development Meetings

Meghana Chalasani
Office of Strategic Programs
FDA's Center for Drug Evaluation and Research (CDER)

Rare Diseases Public Workshop October 30, 2017



The views and opinions expressed in this presentation are those of the individual presenter and should not be attributed to or considered binding on the U.S. Food and Drug Administration (FDA).

Patient's Perspectives Inform FDA's Benefit-Risk Framework



Benefit-Risk Summary and Assessment				
Dimension	Evidence and Uncertainties	Conclusions and Reasons		
Analysis of Condition	 Sets the context for the weighing of benefits and risks: How serious is this indicated condition, and why? How well is the patient population's medical need being met by currently available therapies? 			
Current Treatment Options				
Benefit	 Characterize and assess the evid How meaningful is the benefit, a How compelling is the expected 			
Risk	 Characterize and assess the safe How serious are the safety signal What potential risks could emer 	Is identified in the submitted data?		
Risk Management	Assess what risk management (necessary to address the identif			

Creating Opportunities for Dialogue



FY2013	FY2014	FY2015	FY2016	FY2017
Chronic fatigue syndrome/ myalgic encephalomyelitis HIV Lung cancer Narcolepsy	Sickle cell disease Fibromyalgia Pulmonary arterial hypertension Inborn errors of metabolism Hemophilia A, B, and other heritable bleeding disorders* Idiopathic pulmonary fibrosis	Permale sexual dysfunction Breast cancer Chagas disease Functional gastrointestinal disorders Parkinson's disease and Huntington's disease Alpha-1 antitrypsin deficiency*	Non-tuberculous mycobacterial lung infections Psoriasis Neuropathic pain associated with peripheral neuropathy Patients who have received an organ transplant	Sarcopenia Autism Alopecia areata Hereditary angioedema*

^{*} Meetings conducted by FDA's Center for Biologics Evaluation and Research

We Ask Questions About...



Symptoms and daily impacts that matter most to patients

- Of the symptoms that you experience, which 1-3 symptoms have the most significant impact on your life?
- Are there activities that are important to you but that you cannot do at all or as fully as you would like because of your condition?
- How has your condition and its symptoms changed over time?

Patient perspectives on current treatment approaches

- How well does your current treatment regimen treat the most significant symptoms of your disease?
- What are the most significant downsides to your current treatments, and how do they affect your daily life?
- Assuming there is no complete cure, what specific things would you look for in an ideal treatment for your condition?



Voice of the Patient report that faithfully captures patient input from the various information streams



This input can support FDA staff, e.g.:

- In conducting benefit-risk assessments for products under review, by informing the therapeutic context
- Advising drug sponsors on their development programs

It might also support drug development more broadly:

- Help identify areas of unmet need in the patient population
- Help identify or develop tools that assess benefit of potential therapies
- Help raise awareness and channel engagement within the patient community

Externally-led PFDD: The Opportunity





Meetings conducted by external stakeholders provide an opportunity to expand the benefits of PFDD



An externally-led PFDD meeting and any resulting products (e.g., surveys or reports) will not be considered FDA-sponsored or FDA-endorsed



The success of an externally-led PFDD meeting requires a joint, aligned effort by multiple patient groups associated with the disease area, and other interested stakeholders

Externally-led PFDD: Planning a Meeting



KEY PARTICIPANTS:

Patients, patient representatives, patient advocates

TARGET AUDIENCE (LISTENING MODE):

Regulatory/other federal agencies, medical product developers, researchers, healthcare professionals

DO NOT HAVE TO BE STANDALONE MEETINGS:

Consider incorporating PFDD-style sessions in annual conferences, scientific workshops, etc.

FDA-led meetings can serve as a model:

- Target disease areas where there is an identified need for patient input on topics related to drug development
- Main discussion topics: (1) Symptoms and daily impacts that matter most to patients and (2) current approaches to treatment
- Facilitator-led large group discussion, interactive webcast, discussion aids (e.g., polling tools)
- Meeting deliverables: Web recording, transcript, summary report

Externally-led PFDD: Key Considerations





Please submit a letter of intent (LOI) to CDER's Office of Strategic Programs. Our team is here to serve as a helpful resource to you.



While we truly understand the effort it takes to plan a PFDD meeting, but it can be done without being resource intensive!



The key to an insightful, robust, and informative PFDD meeting is active community outreach to ensure a representative group of patient perspectives in the room.



We must be respectful of the time of patients and their caregivers.

Some PFDD Learnings to Date



- Patients with chronic serious disease are experts on what it's like to live with their condition
- They are able to **identify and articulate specific disease impacts** (symptoms, loss of function) in concrete terms
- They can identify and articulate what is important to them regarding treatment benefit
- Their "chief complaints" may not be factored explicitly into drug development plans
- They want their experience described using words that they consider best to describe how it feels
- Patients want to be as active as possible in the work to develop and evaluate new treatments

PFDD Next Steps



Advance science of patient input

- Engage wider community to discuss methodologically sound approaches that:
 - Bridge from initial PFDD meetings to more systematic collection of patients' input
 - Generate meaningful input on patients' experiences and perspectives to inform drug development and B-R assessment
 - Are "fit for purpose" in drug development and regulatory context

Provide guidance

- To: patient communities, researchers, and drug developers
- On: pragmatic and methodologically sound strategies, pathways, and methods to gather and use patient input, or patient experience data, that can be submitted to FDA for use across drug development programs.



Guidance 1 and Workshop



Guidance 2 and Workshop

Guidance 3 and Workshop

Guidance 4 and Workshop

collecting comprehensive and representative patient and caregiver input on burden of disease and current therapy

Address topics including:

- standardized nomenclature and terminologies (glossary)
- methods to collect meaningful patient input throughout the drug development process
- methodological considerations for data collection, reporting, management, and analysis

December 18th Public Workshop: Collecting Comprehensive & Representative Input



- Discussion on methodological approaches that a person seeking to collect patient experience data for submission to FDA to inform regulatory decision-making may use
- FDA is seeking information and comments from a broad range of stakeholders, including patients, patient advocates, academic and medical researchers, expert practitioners, drug developers and other interested persons.
- Register to attend in person or via webcast: www.pfdd.eventbrite.com





Guidance 1 and Workshop

Guidance 2 and Workshop



Describes processes and methodological approaches to develop holistic set of impacts that are most important to patients

Guidance 3 and Workshop

Guidance 4 and Workshop

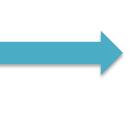


Guidance 1 and Workshop

Guidance 2 and Workshop

Guidance 3 and Workshop

Guidance 4 and Workshop



Describes approaches to identifying and developing measures for an identified set of impacts (e.g., burden of disease and treatment), which may facilitate collection of meaningful patient input in clinical trials



Guidance 1 and Workshop

Guidance 2 and Workshop

Guidance 3 and Workshop

Guidance 4 and Workshop



Incorporating measures (COAs) into endpoints considered significantly robust for regulatory decision making

For More Information



FDA's PFDD Meetings

 Previously conducted FDA-led meetings, including all of meeting materials, such as agendas and discussion questions, as well as the Voice of the Patient summary reports:

http://www.fda.gov/ForIndustry/UserFees/PrescriptionDrugUserFee/ucm347317.htm

Externally-led PFDD Meetings

- For more information and guidelines for letter of intent (LOI):
- http://www.fda.gov/ForIndustry/UserFees/PrescriptionDrugUserFee/ucm453856.htm

21st Century Cures (Patient-Focused Drug Development):

For the complete work plan for issuance of PFDD guidances, please visit:
 https://www.fda.gov/downloads/ForIndustry/UserFees/PrescriptionDrugUserFee/UCM5
 63618.pdf

Questions?

- Email <u>patientfocused@fda.hhs.gov</u>
- FDA CDER's Office of Strategic Programs is leading FDA's PFDD effort

Acknowledgement



Office of Strategic Programs

Theresa Mullin
Pujita Vaidya
Sara Eggers
Graham Thompson
Shannon Woodward

Office of New Drugs CDER Senior Leadership





CureSMA: Early Engagement and PFDD Meeting with FDA ROSANGEL CRUZ, M.A.



Cure SMA Early Engagement with FDA & Externally-Led PFDD Meeting



Make today a breakthrough.



Cure SMA

We fund groundbreaking research for treatment and a cure for SMA and provide families the support they need for today.





Impact

- 115,000 supporters throughout the country
- 12,000 members affected by SMA
- 350 newly diagnosed contacts annually
- \$60 Million in research funding
- 28th Annual conference, 1500 attended





Reasons Cure SMA Approached FDA

- Relationship Building Is your organization known to FDA?
 - Center for Biologics Evaluation and Research, CBER
 - Center for Drugs Evaluation and Research, CDER
 - Review Divisions, OSP, PACE, Office of Rare Diseases, etc.
- Providing patient perspective, including SMA's disease severity and its impact on patients' and families' daily lives
 - Discussed the SMA's community creation of the Voice of SMA booklet
- Engaging in discussions on outcome measures, biomarkers, clinical trial design
- Educating regulators on clinical meaningfulness (important for drug approval) and risk tolerance in our community.

What is Important to Your Community?!



Opportunities that Led to Positive Interactions with FDA

2017	Patient Focused Drug Development Meeting, April 18
2016	Listening session with FDA Commissioner, Dr. Califf, December 11
2015	Voices of SMA Booklet, September
2013/15	Patient focus groups /surveys on clinical meaningfulness and impact on daily living / Expectations for clinical trials (2 publications sent to FDA followed)
2011/14	Scientific Meetings: NINDS -So SMART Outcome meeting, June 2014 / Biomarkers' Meeting, 2011
Ongoing	Providing formal commentary on FDA guidance on multiple occasions
2007 F	DA attendance and speaking at annual conference, ongoing for years



Informing Regulators On Severity of SMA: Impact on Families/Patients' Lives and Meaningful Change

Disease burden/impact

 SMA has a broad and devastating impact (direct & indirect) on the lives of all those affected and their families

Meaningful change in SMA:

Small change = BIG difference

Additive, incremental change critical to maximal efficacy

- Therapy that prevents decline or gives small improvements has huge value
- Additive or Incremental change could lead to greater overall function
- Both improved respiratory function and fatigue have significant impact
- Importance cited for daily living activities



Meaningful Change



"But if we could just keep what we have, that would be enormous, because then there's still so much functionality there. There's not a breathing machine at night yet. There's not all of the rods in the back. There's not all this stuff that I know could be coming. If I can just hold on to where we are, that would—man, that would be big." (1409-FG5-01 Caregiver Type 3)



What Have We Learned via these Interactions?

FDA is as eager to learn about your patient community as you are to share your community with them!

"Most of our medical education comes from patients. This [meeting] gives us as regulators the opportunity and the privilege to continue our education by listening to you."

-Wilson Bryan, MD

Director of the Office of Tissues and Advanced Therapies in the FDA's Center for Biologics Evaluation and Research



How can you best prepare to ensure a successful engagement with FDA?

- Be specific about what you are going to talk about
 - Have a specific topic/agenda prepared
- Educate yourself about the process
 - Submitting a Letter of Intent (LOI) to conduct a PFDD specific information required on LOI?
 - Preparing to conduct an Externally-Led PFDD meeting do your homework!
- Don't be afraid to ask/learn from others who have come before you
 - MDF
 - Amyloidosis
- You may want to hire help to assist in facilitating interactions with various units at FDA and key division leaders
 - Regulatory Consultant, James Valentine
 - Consulting Group, DrinkerBiddle

Externally-Led Patient Focused Drug Development (PFDD) Meeting April 18, 2017



Setting the Stage - In the words of Dr. Wilson Bryan...

"What we hear today will help us to think about clinical trial design, what outcome measures to use in clinical trials, what really matters to patients, and how we as regulators should think about the balance of risks and benefits for patients with SMA..."

- Wilson Bryan, MD, Director of the Office of Tissues and Advanced Therapies in the FDA's Center for Biologics Evaluation and Research.



SMA PFDD – A Labor Of Love!





Well-Attended with Representation from All Key SMA Stakeholders

- **422** individuals registered to attend, with representation from 40 states and 27 countries
 - In person (204) / Via webcast (218)
- Of those registered to attend in person:
 - 98 individuals with SMA, parents, and caregivers
 - 10 had someone close to them with SMA
 - 31 representatives from 10 Patient Advocacy organizations
 - 16 FDA leadership staff (CDER, CBER, OHCA, others)
 - 27 Industry members
 - 6 academic clinicians

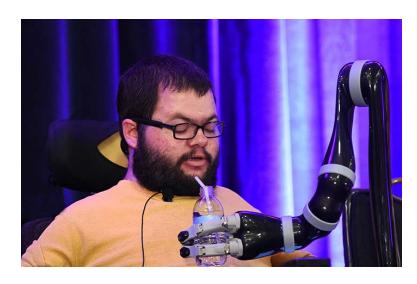


An Outstanding Group of Panelists was Chosen to Represent the Voices of SMA - All Ages, Stages and Types of SMA





SMA Type II/III: On the Burden of SMA II/III – Fatigue, Muscle Weakness, Progressive Loss of Functional Abilities







6 are patients or parents with type II (5-29) 6 are patients or parents with type III (5-41)



On an Ideal Treatment...

"We want to make sure we understand the impact of the disease and what patients prioritize in the treatment of their disease"

- Dr. Billy Dunn MD, Director, Division of Neurology Products, CDER, FDA



An Ideal Therapy – What matters most to patients with SMA

Type Is

- Ability to speak, communicate how child feels
- Management of secretions
- Respiratory Complications "being less dependent on machines"

Type II/III

- Small changes / HUGE impact
- Fatigue
- Upper body strength/ diaphragmatic weakness
- Respiratory Complications (type IIs)
- Stopping disease progression, retaining mobility and function (Stabilizing disease)

All Types

- Muscle strength stronger arms, legs, spine
- Endurance



Yet ... What We Really Took Away from this...



- Hope
- Resilience
- Persistence
- Optimism
- Bravery
- Creativity
- Strength
- Love

"[I have heard of...] Your commitment and love for your children; your courage and determination as adults, older children and teens; and how you maintain hope and unity." — Dr. Jonathan Goldsmith



FDA's Concluding Remarks



"Your voice, which we heard today loud and clear, and in great detail, helps FDA as we perform our public health mission and as we evaluate and approve new drug applications"

- Jonathan Goldsmith, MD,

Associate Director for Rare Diseases in the Office of New Drugs in the FDA's Center for Drug Evaluation and Research







PFDD Meetings - Influence the Community and Outcomes

- Enhanced interactions with FDA
- Open channels for continued communication with FDA
 - Voice of the Patient Report
 - Benefit Risk Survey
 - Follow Up workshop
- Opportunities to engage and support other non-profit, rare diseases organization in sharing "Best Practices"
- A more cohesive sense of community amongst all key SMA Stakeholders
 - Families, Caregivers, and Affected individuals, FDA, Industry, Academicians/Researchers,
 Other patient-centered organizations



Lessons Learned from Our PFDD

- For externally-led PFDDs, advocacy group must lead on content, speakers, and logistics
- Keep FDA's Office Of Strategic Programs (Dr. Mullin) in the loop, but have realistic expectations on their involvement with planning
- Prepare panelists well



Lessons Learned from Our PFDD, Continued

Think carefully about your polling questions

- Make sure they probe and reinforce the key themes being identified by the panelists
- Make sure they are phrased correctly and ask what you think they do to ensure data will be useful in the end

Pick your moderator very carefully

 Make sure he/she understands the big picture and directs audience discussion and questions accordingly

Make sure all AV logistics are running before start of meeting

 Live polling question, Live streaming video, Transcription service to help write up VOP, presentation slides



Experience with Patient Engagement in Neurology BILLY DUNN, M.D.



Questions and Answers



LUNCH

12 – 1 P.M.







CASE STUDIES:

THE IMPORTANCE OF HISTORICAL CONTROLS PATIENT DATA AND REGULATORY FLEXIBILITY WHEN ENGAGING WITH CDER

Moderator: Francis Kalush, Ph.D.

Case Study 1 – TSAlliance: Steve Roberds, Ph.D.

Case Study 2- Amyloidosis Research Consortium: Isabelle Lousada

External Controls Patient Data and CDER Flexibility for Rare Disease

Drug Approval: Dragos Roman, M.D.

Importance of Controlled Trials and Natural History Studies – Bridging the Gap Between Impressions and Data: Henrietta Hyatt-Knorr, M.A.



Moderator: FRANCIS KALUSH, PH.D.



Case Study 1 – TSA Alliance STEVE ROBERDS, PH.D.





Externally-Led Patient-Focused Drug Development Meeting for TSC

Steven L. Roberds, PhD, Chief Scientific Officer

Tuberous Sclerosis Alliance



About Tuberous Sclerosis Complex (TSC)

- Tuberous sclerosis complex (or TSC) is a genetic disorder that causes tumors to form in vital organs, primarily the brain, eyes, heart, kidney, liver, lungs and skin.
- Neurological manifestations are often the most devastating.
- TSC is a leading genetic cause of autism and epilepsy.
- TSC affects ~1 in 6,000 live births.
- An estimated 50,000 Americans have TSC, and more than 1 million worldwide.













Tuberous Sclerosis Alliance

The TS Alliance, founded in 1974, is committed to finding a cure for tuberous sclerosis complex while improving the lives of those affected:

- by developing programs, support services and resource information;
- by stimulating and sponsoring research; and
- by creating and implementing public and professional education programs designed to heighten awareness of the disease.

www.tsalliance.org









The Need for FDA Engagement

- Existing FDA-approved treatments have helped many patients but are not sufficient
- TSC affects every individual differently, even identical twins
- Risks of TSC are very high; therefore, some patients or parents may have a very high tolerance for risks of new therapies
- ► The possibility of preventing some manifestations of TSC is here:
 - Infants are often identified prenatally based upon presence of cardiac rhabdomyomas
 - Need to treat seemingly "healthy" people before the damage of TSC is done





Designing the Patient-Focused Drug Development Meeting

Two high-priority areas of unmet need and ongoing therapy development:

- Preventing and/or controlling epilepsy, especially in infancy
- Reversing or preventing life-threatening manifestations in adults: tumor growth and cyst formation in kidneys and lungs

Two review divisions: neurology and oncology

Two very different types of clinical endpoints



One meeting – two sessions





Speaking to the Audience

Addressing FDA's Risk-Benefit Framework

MORNING SESSION - INFANTS AND CHILDREN WITH TSC

- Panel #1: Living with TSC
- Panel #2: Current and future approaches to treating TSC

AFTERNOON SESSION - ADULTS WITH TSC AND/OR LAM

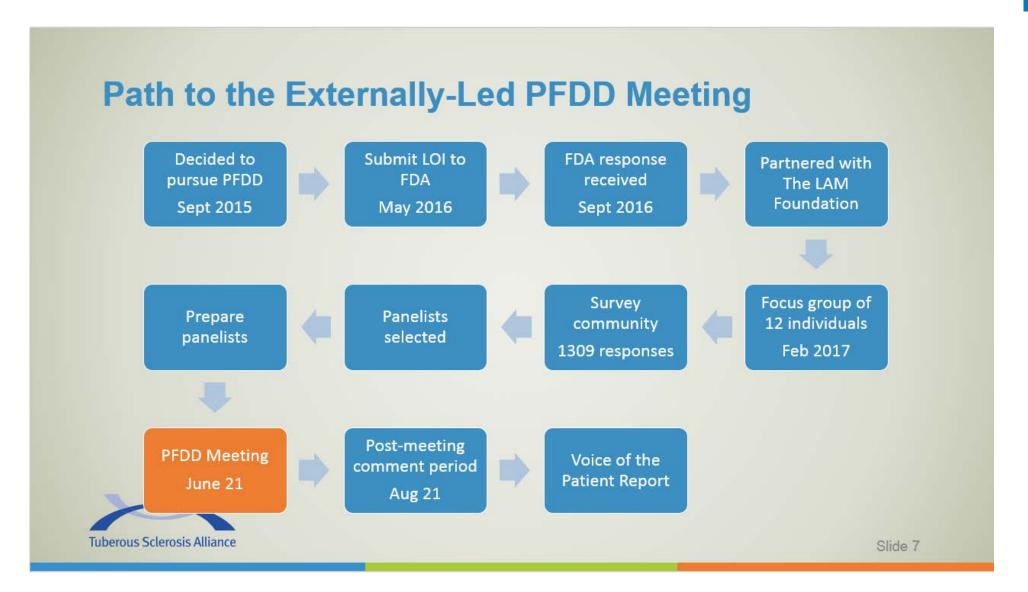
- Panel #1: Living with TSC and/or LAM
- Panel #2: Current and future approaches to treating TSC and/or LAM

Each panel's testimony followed by:

- Audience and remote polling
- · Moderated audience discussion









How We Engaged the Community

- Focus group of 12 representative individuals to define key issues
- International survey for quantitative input
 - 1309 responses, 66.5% from US
 - Questions in three languages, responses from 57 countries
- 16 panelists representing a variety of TSC and LAM patients
- Webcast with 666 live views
- Live polling questions
- Live commenting on social media
- 30-day post-meeting open comment period

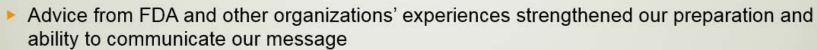






Reflecting on Our Experience

- Excellent in-person and online turnout
 - · Patients and caregivers
 - FDA staff
 - Industry
- Survey data complemented the impact of personal testimony
- Partnering with The LAM Foundation increased engagement and participation









Case Study 2 – Amyloidosis Research Consortium ISABELLE LOUSADA





Approaching CDER at FDA: Patient Focused Drug Development Meetings

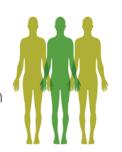
Isabelle Lousada

Amyloidosis



8,220patients are diagnosed in the US and Europe each

year with AL Amyloidosis





1,600,000

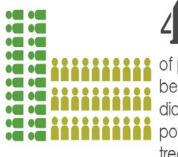
African-Americans are estimated to carry the TTR V122I genetic mutation and are at risk of developing ATTR Cardiac Amyloidosis



of AL patients have cardiac involvement

is the average number of doctors a patient sees before being diagnosed

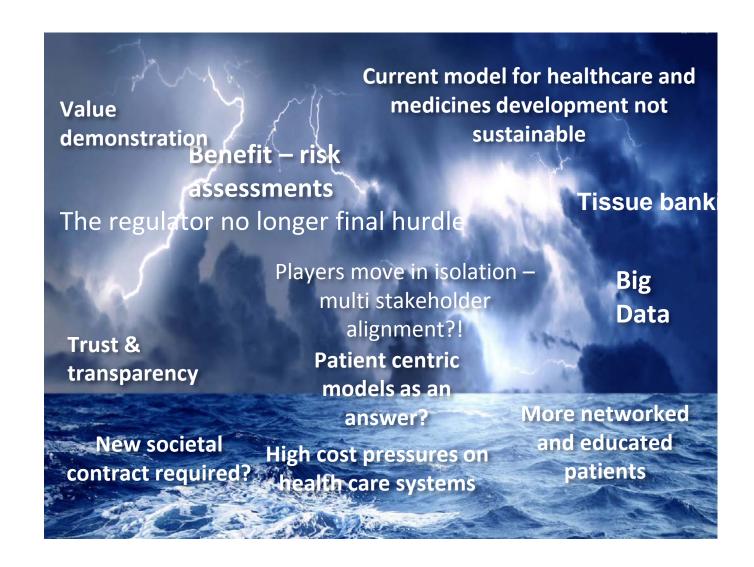




40%
of patients die,
because they were
diagnosed too late to
potentially benefit from
treatment



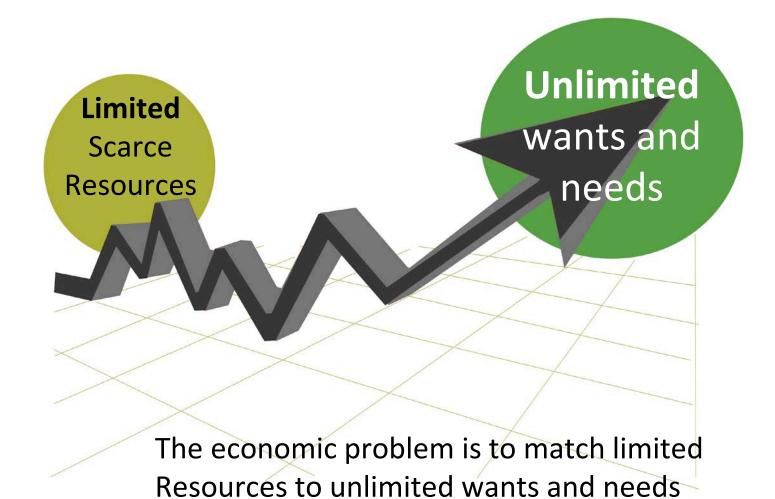
Perfect Storm









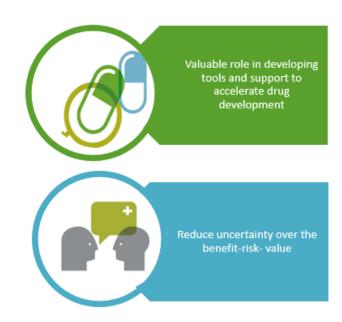


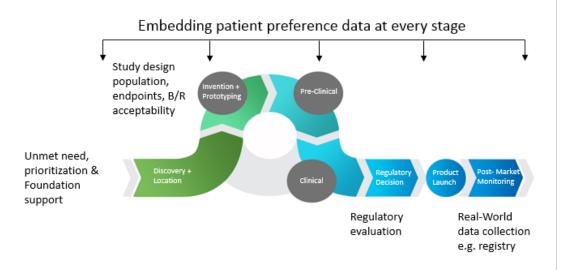
Resources



Role of Patient Led Foundations Across Drug Development





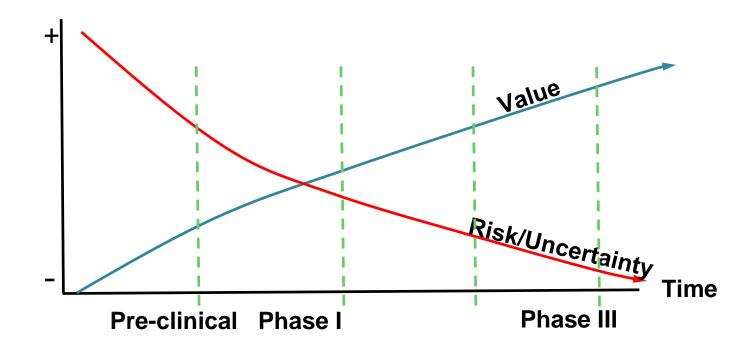


Patients are experts in their disease, and properly engaged can play a vital role in all stages of drug development





De-Risking, Improving Value

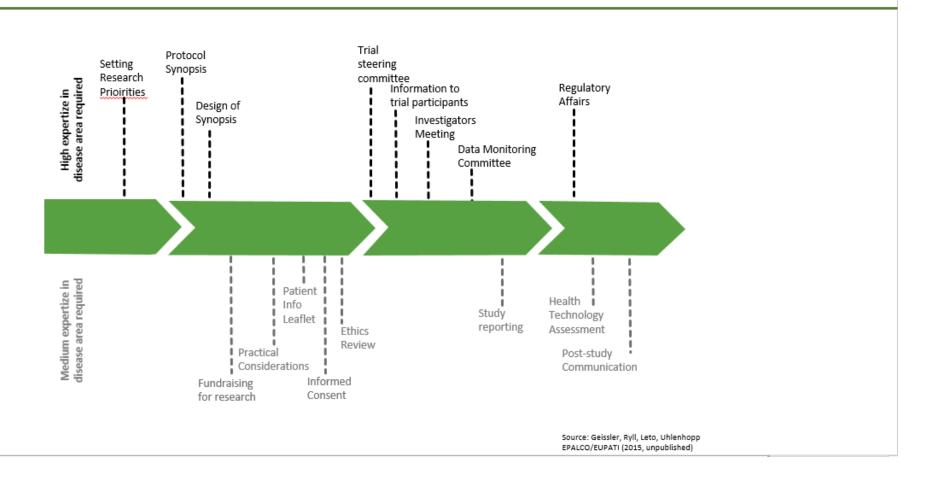


Better Research for Better Outcomes





Patient Involvement R&D life cycle



Building Programs to Support Drug Development







- Guidance for Industry on Drug Development
- Biomarker Development
- Patient Focused Drug Development Meeting
- Patient Voice Publication







Externally-Led Patient Focused Drug Development Meeting

ARC's Meeting

- 18th September 2015
- 15th November 2015
- 240 Attendees. Including industry, experts, FDA, and NIH
 - 125 pts and caregivers
- 340 registered for the live webinar
- 38 patients submitted stories

Format of meeting was somewhat different than typical PFDD meetings:

- Presenting data alongside patient voice
- Follow on Survey for patients





External Controls Patient Data and CDER Flexibility for Rare Disease Drug Approval DRAGOS ROMAN, M.D.

www.fda.gov



Case Studies in Drug Approval for Rare Diseased – Lessons Learned

CDER Rare Disease Public Workshop
October 30, 2017

Dragos Roman, MD

Deputy Director

Division of Gastroenterology and Inborn Errors

Products

OND/CDER/FDA



Disclosure Statement

• The views expressed in this presentation are mine, and do not represent an official FDA position.

I have no financial interests to disclose.



Outline

- Regulatory standards of drug approval in rare diseases
- Three case studies:
 - Uridine acetate for orotic aciduria
 - Asfotase alfa for hypophosphatasia
 - Cerliponase alfa for neuronal ceroid lipofuscinosis type II
- Lessons learned



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Regulatory Milestones

- 1938: Food, Drug, and Cosmetic Act (FD&C Act) mandated a pre-market review of the safety of all new drugs
- 1962: the Kefauver-Harris Amendment to the FD&C Act requirement that all new drug applications demonstrate "substantial evidence" of effectiveness
- 1983: Orphan Drug Act (financial incentives for orphan diseases: <200,000 patients in the US)



Definition of "Substantial Evidence"

- Section 505(d) of the FD&C Act: "Evidence consisting of adequate and well-controlled investigations...
- Traditionally **two adequate and well-controlled studies** when each meets its primary endpoint by its prespecified primary analysis with a p-value of less than 0.05
- FDA Modernization Act (FDAMA; 1997) substantial evidence of effectiveness can be based on "one adequate and well-controlled study and confirmatory evidence."



Disease Prevalence

- High prevalence diseases:
 - Diabetes prevalence: 29.1 million (2012)
 - Hypertension: 75 million (2016)
 - NASH: 10-16 million (2017)
- Low prevalence (rare diseases):
 - Hereditary orotic aciduria prevalence: 1:1,000,000
 - Hypophosphatasia: ≈1:100,000
 - Neuronal ceroid lipofuscinosis type 2 ≈1: 300,000



"Flexibility" and Regulatory Requirements

- 21 CFR 314.105 Approval of an application [...]:
 - "FDA will approve an application after it determines that the drug meets the statutory standards for safety and effectiveness, manufacturing and controls, and labeling..."
 - "... FDA is required to exercise its scientific judgment to determine the kind and quantity of data and information an applicant is required to provide for a particular drug to meet the statutory standards."
- 21 CFR 312.80 Drugs intended to treat life-threatening and severelydebilitating illnesses
 - FDA has determined that it is appropriate to exercise the broadest flexibility in applying the statutory standards while preserving appropriate guarantees for safety and effectiveness.

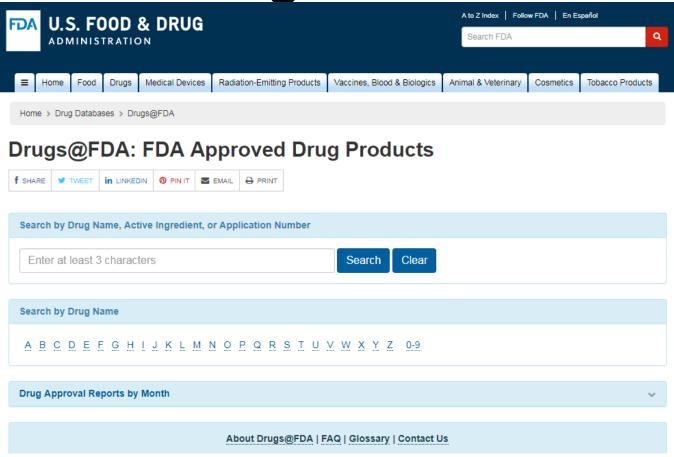


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Drugs at FDA





Hereditary Orotic Aciduria (HOA)

- enzyme defect: uridine monophosphate synthase
- since original disease description (1959) about 20 patients with HOA have been reported in the medical literature (only 15 or so having been documented in sufficient detail)
- heterogeneous manifestations:
 - hematological (megaloblastic anemia, neutropenia)
 - failure to thrive, developmental delay
 - crystalluria and obstructive uropathy
- no approved drugs until 2015 (uridine used investigationally for decades)



- uridine triacetate: pro-drug of uridine approved in 2015 (Xuriden)
- uridine triacetate was granted:
 - Orphan Drug designation
 - Breakthrough Therapy designation
 - multiple multidisciplinary meetings with input from senior FDA reviewers and managers
 - Rare Pediatric Disease Priority Review designation
 - NDA was reviewed as a Priority Review (shortened review time)



- NDA based on a dataset of 4 patients AND published literature information
- all major aspects of the HOA clinical program have been discussed with the applicant
- 505(b)(2) application:
 - published literature can be used in support of a New Drug Application (NDA)



- Existing literature data provided:
 - understanding of the physiological requirements for de novo pyrimidine synthesis in adults
 - estimate of exogenous uridine doses necessary for replacement treatment in patients with HOA
 - confirmation of an effective range of doses (doses of 50-300 mg/kg/day) in treating anemia (the most common disease manifestation in HOA) in multiple independent reports
 - a minimally effective dose (50 mg/kg/day)
 - timecourse for PD markers (reticulocyte count, urinary orotic acid)
 - persistence of treatment for months/years as long as doses are adjusted
 - data mostly for anemia but also for other manifestations of the disease (hematological or not)



- NDA leveraged the existing literature data and provided:
 - a starting dose of uridine triacetate (60 mg/kg/day) and a dose range of effective doses (60-120 mg/kg/day) informed by an understanding of
 - the mass ratio between uridine and uridine triacetate allowed calculation of Xuriden doses which provide similar molar concentrations as specific uridine doses
 - differences in bioavailability between uridine and uridine triacetate (4 times more bioavailable than uridine on a weight basis)
 - confirmation that Xuriden maintains similar pharmacodynamic (biochemical and hematological) effects in a small group of patients (4) with HOA already treated successfully with uridine



Uridine Triacetate for HOA – Lessons Learned

- A successful clinical program requires early discussions and steady collaboration between drug developers and regulators
- Always leverage any existing data!
- Plan very thoughtfully how to maximize the value of patient information/data
- Incentives facilitate drug development in rare diseases and bring treatments to the market (Rare Pediatric Disease Priority Review Voucher)



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Hypophosphatasia (HPP)

- rare metabolic bone disease (prevalence: 1/100,000 for severe forms of HPP)
- due to inactivating mutations in tissue-nonspecific alkaline phosphatase (TNSALP)
- TNSALP is essential for bone mineralization:
 - releases inorganic phosphate from inorganic pyrophosphate (PPi)
 - inorganic phosphate a precursor of calcium phosphate
 - hydroxyapatite crystals in the bone matrix giving strength and rigidity to the bones
- no approved drug prior to 2015



Hypophosphatasia – Clinical Manifestations

- defective bone mineralization
- rickets and osteomalacia
- deformities and fractures of the long bones
- abnormalities of the thoracic cage resulting in respiratory dysfunction and insufficiency
- non-skeletal manifestations include pyridoxine-responsive seizures
- hypercalcemia, hypercalciuria (including nephrocalcinosis)
- myopathy (contributing to delayed or abnormal gait)
- dental manifestations
- clinical variability: perinatal/infantile, juvenile, and adult forms



Asfotase Alfa

- biologic: glycoprotein composed of two identical polypeptides,
 each polypeptide chain is a fusion of
 - the catalytic domain of human tissue non-specific alkaline phosphatase,
 - the Fc domain of the human immunoglobulin G1
 - a bone targeting domain (a deca-aspartate peptide).



Asfotase Alfa for Hypophosphatasia

- asfotase alfa (Strensiq) was approved in 2015 (Strensiq)
- asfotase alfa was granted:
 - Orphan Drug designation
 - Fast Track Designation ("rolling review")
 - Breakthrough Therapy designation
 - Priority Review



Asfotase Alfa – Clinical Program

- Perinatal/infantile form
 - a prospective, open-label, single-arm trial in 11 patients (24-weeks with extension)
 - a prospective, open-label, single-arm study in 59 patients (up to 96 weeks)
- A natural history clinical study
- Juvenile form
 - prospective, open-label, single-arm, clinical trial in 8 patients (24-week plus extension)



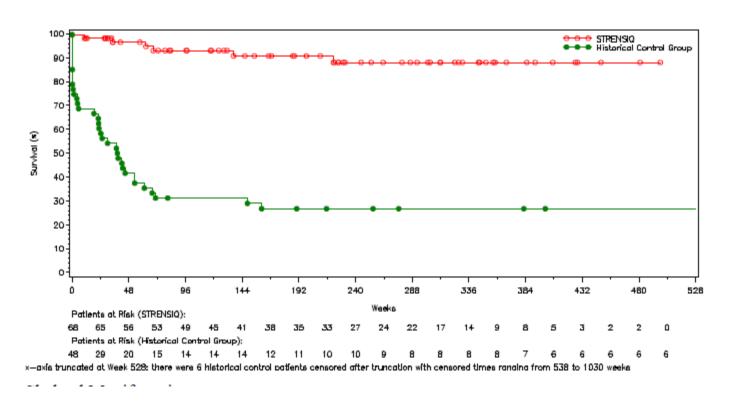
Asfotase Alfa – Clinical Program

- major aspects of the asfotase alfa clinical program have been discussed with the applicant
- for the perinatal/infantile form the severe lethal course was well documented
- no placebo group was used: the clinical trial data were compared to the data from the a natural history cohort
- agreed endpoint: overall survival and ventilator-free survival ("hard endpoint")



Efficacy Results

Figure 1: Overall Survival in STRENSIQ-Treated versus Historical Control Patients with Perinatal/Infantile-Onset HPP



169



Asfotase Alfa – Lessons Learned

- when "hard endpoints" are used and the natural history of the disease is well characterized, a placebo arm may not always be necessary
- close collaboration between drug developers and regulators is essential



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Neuronal Ceroid Lipofuscinosis Type 2 (CLN2)

- Progressive neurodegenerative lysosomal storage disease
- Single gene defect: tripeptidyl peptidase-1 (TPP1)
- Following lysosomal uptake TPP1 activates at acidic pH and cleaves tripeptides from the N-terminus of proteins accumulating in the lysosomes
- Prevalence: estimated at 1:300,000
- No approved therapy until 2017



Neuronal Ceroid Lipofuscinosis Type 2 – Clinical Manifestations

- Marked by inexorable neurodegeneration
 - Typically seizures between 2-4 years of age with relatively predictable neurological deterioration
 - Myoclonus
 - Impaired speech and swallowing
 - Developmental regression
 - Loss of vision
 - Most are blind and wheelchair bound by age 6 yrs
 - Death typically at 10-16 yrs

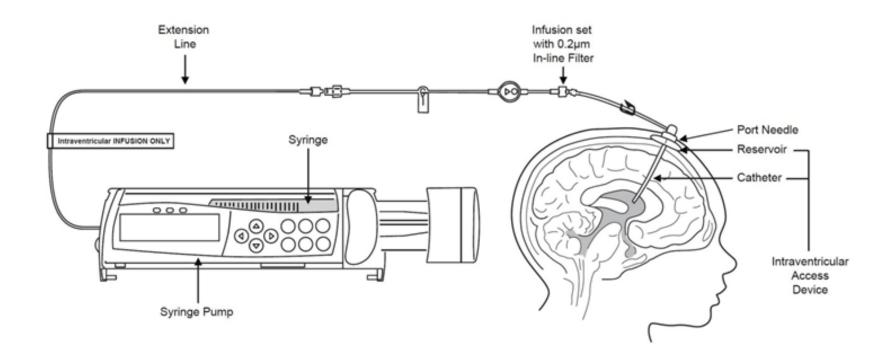


Cerliponase Alfa – Clinical Program

- Single-arm, open-label, 48 week study with an extension
 - population: $(n=24) \ge 3$ yo
 - primary endpoint: CLN2 scores (observer reported outcome)
- Natural history registry
 - population: (n=69)
 - mostly retrospective, a limited prospective component
 - variable amounts of data collected among patients
 - analyzable population (n=42)
 - assessed CLN2 scores with a slightly different questionnaire



Cerliponase Alfa Administration





Cerliponase Alfa - Clinical Program

• Challenges:

- Populations differences (genetics, age, timing of data collection)
- Data in the natural study were mostly retrospective (much earlier in some patients – possible different standard of care)
- Modified rating scales in the intervention study vs. the natural history study (particularly related to the language domain)

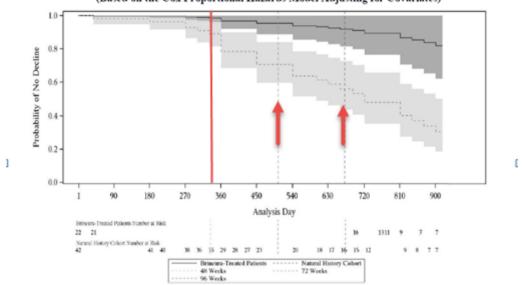
• Solutions:

- Found the best matched groups (genetics, disease severity)
- Extend the observation time
- Complex statistical analyses to confirm the efficacy claim



Cerliponase Alfa

Figure 7. Estimated Time to Unreversed (Sustained) 2-Category Decline or Unreversed Score of Zero in Motor Domain for Symptomatic Pediatric Patients in the Brineura Single-Arm Clinical Study with Extension and for Patients in a Natural History Cohort (Based on the Cox Proportional Hazards Model Adjusting for Covariates)



Shading represents 95% confidence intervals.



Cerliponase Alfa – Lessons Learned

- When endpoints other than "hard endpoints" are used there are significant challenges to comparisons to a natural history study
 - seek best match in the patient populations
 - use the same instrument (e.g. questionnaire, rating scale, assay, etc.) to collect critical data
 - if matching is not optimal ensure enough time of observation to eliminate residual uncertainty about the validity of the comparison



Drug Development in Rare Diseases – Final Thoughts

- early discussion and involvement of regulators
- think globally: phase 1, phase 2, and phase 3 programs are a continuum in generating data and cannot be artificially split
- consider innovative designs (but talk with us before implementing them!)
- always necessary to collect good data (every patient data point counts!)
 - standardize data collection will help facilitate meaningful comparisons
 - "totality of data" does not mean ANY data, but WELL PLANNED collection of INFORMATIVE data



Drug Development in Rare Diseases – Final Thoughts

- we want to hear patient's voice
- patients' experience can inform drug development in many ways:
 - helps understanding of the disease burden
 - helps identification of specific symptoms or disease manifestations that are relevant to patients (how the patient feels or functions)
 - helps the selection of assessments and endpoints in clinical trials
 - helps to identify benefits that may not be obvious to outside observers or readily measurable



Importance of Controlled Trials and Natural History Studies – Bridging the Gap Between Impressions and Data

HENRIETTA HYATT-KNORR, M.A.

NCATS Improving Health Through Smarter Science

Importance of Natural History Studies and Clinical Trials: Bridging the Gap Between Impressions and Data

How ORDR Intends to Facilitate the
Production of Good Data
By Henrietta D. Hyatt-Knorr, MA
Office of Rare Diseases Research/NCATS





Where to begin...



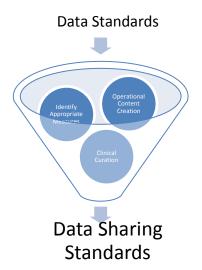


What is a Natural History Study: Following subjects who have or may develop a specific disease.

- Begin with the end in mind ...
- Knowledge of the disease's natural history is important when planning to develop a treatment
- Many of the 7,000 or so rare diseases are poorly understood
- The lower the prevalence, the more likely that a disease is not well understood
- Usually, the ultimate hope is a first treatment for a rare disease
- Requires careful planning
- Often high phenotypic diversity

Three Phases

- Planning Phase Data Standards
 - "FAIR" Principle
 - Findable
 - Accessible
 - Interoperable
 - Reusable
- Data Input Phase Content Standards
 - Operationalize Content Creation
 - Identification Appropriate Measures
 - Clinical Content Curation
- Sharing Phase Data Sharing Standards
 - Clinical Research Outcomes Data Sharing/Hosting

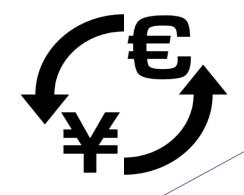




PLANNING PHASE

Data Standards - Accessible and Interoperable

FAIR → Accessible
Currency Exchange → Yens to Euros





Interoperable → Data Standards ICD9/10

Lingua Franca A language that is adopted as a common language among speakers whose native languages are different. **Male = 1, Male = M, Male = Male**



DATA INPUT PHASE



Why Data Collection and Management Matter

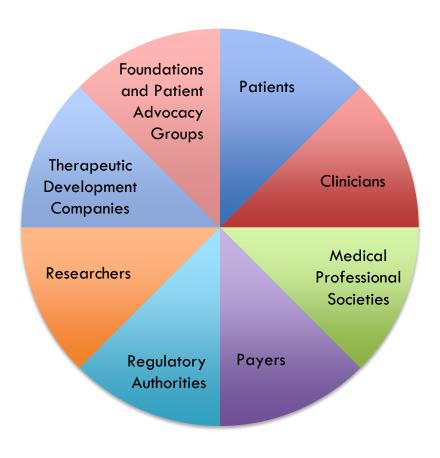
<u>Data management</u>—the integrated system for collecting, cleaning, storing, monitoring, reviewing, and reporting on data—determines the utility of the data for meeting the goals of the study.

Quality assurance, on the other hand, aims to assure that the data were, in fact, collected in accordance with these procedures and that the data stored in the database meet the requisite standards of quality, which are generally defined based on the intended purposes.

- AHRQ 2014

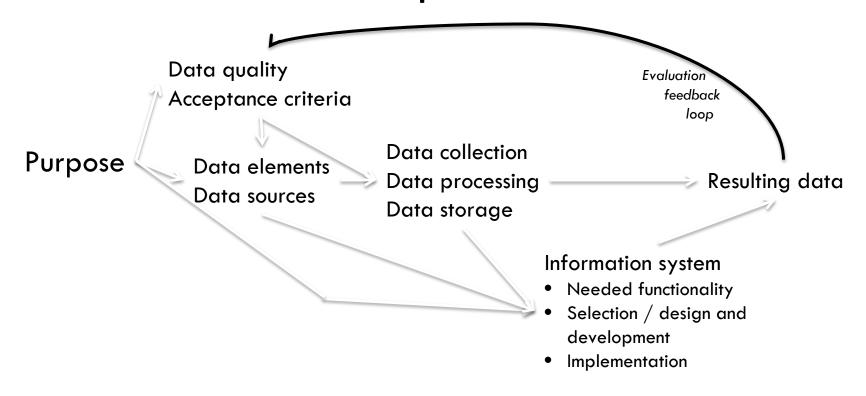


Multiple Stakeholders





Data collection and management Components



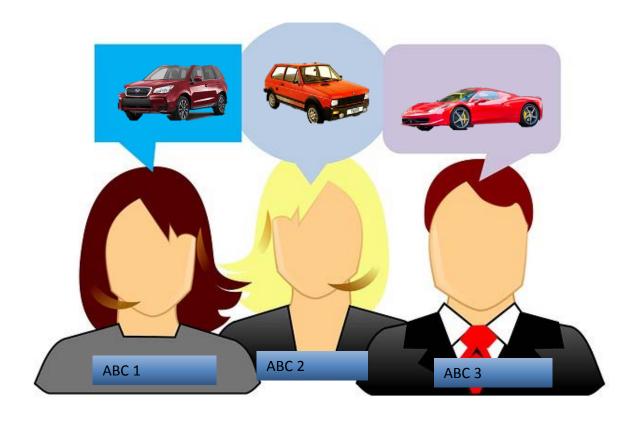
Data collection and Management Components



Topic
Purpose
Data quality acceptance criteria
Data element selection
Data element definition
Data source selection
Data standards selection
Data observation/measurement methods
Data collection workflow analysis & design
Data recording methods
Data processing methods
Identification of information system needs
Information system testing
Information system implementation
Data quality assessment and assurance
Traceability



Across Stakeholders





DATA SHARING





- Exchanging or sharing data without sufficient metadata is irresponsible and can be dangerous.
- Too many choices ("standards") and lack of collaboration to harmonize (models, terminologies, metadata standards, CDEs) creates confusion and exacerbates the problem; redundancy and duplication of efforts are barriers to data sharing.
- Data and metadata must be available in a format that is useful 'downstream' for appropriate aggregation, analysis and interpretation.
- Research data is PRECIOUS, especially for rare diseases; 'big data' solutions are not appropriate.



End User Considerations

- How do I request access to the data?
- Who makes the decision about who gets access to the data. What are the decision criteria? DAC: data access committee.
- How long does it take to get a decision?
- How long do I get to keep the data and what is the process for renewing my access?



End User Considerations

- What restrictions are placed on use of the data?
- What type of infrastructure do I need to process the data? Where am I allowed to store the data and what types of security measures do I need to put in place?
- How technically challenging is it to work with the data? Decryption, data organization, ability to integrate with other data sets.
- What quality assurance measures have been applied to the data?
 How much do I trust the data?



BREAK TIME

2:15 - 2:30 P.M.







SO, YOU WANT TO MEET WITH CDER? DEVELOPING AN EFFECTIVE ENGAGEMENT STRATEGY

Moderator: Kendall Davis, M.P.H.

CDER Expert Perspective – Best Practices:

Laurie Muldowney, M.D.

Patient Advocate Perspective – Best Practices:

James Valentine, J.D., M.P.H.



CDER Expert Perspective: Best Practices LAURIE MULDOWNEY, M.D.



Developing an Effective Engagement Strategy

Laurie Muldowney, M.D.

Associate Director for Medical Policy

Office of Translational Sciences

Rare Disease Advocacy Workshop: October 30, 2017



- The Patient Voice
 - How is patient input used?
- Patient Focused Drug Development
- Engagement with CDER
 - Types of Engagement
 - When to engage
- How to prepare



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- Identify what matters/what is important to patients
- Aid in development of clinical trials that are meaningful and realistic
- Raise Awareness





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FDA Patient-Focused Drug Development (PFDD)

PFDD introduced in 2012 (PDUFA V)

- Develop a more systematic way of gathering patient perspective on their condition and available treatment options to inform B-R assessment
- Conduct public meetings focused on specific disease areas

Key Learnings: Patients with chronic serious disease are experts on what it is like to live with their condition. Their "chief complaints" may not be factored into drug development and data collection plans.

Cures Act Title III Subtitle A Patient-Focused Drug Development (PFDD)



Section 3001: Patient Experience Data

 Following the approval of an NDA/BLA submitted after June 12, 2017, make public a brief statement regarding the patient experience data and related information, if any, submitted and reviewed as part of such application.

Section 3002: PFDD Guidance -- to address the following

- Methodological approaches for collection of patient experience data to ensure data are relevant, objective, accurate and representative of the intended population, including methods to collect meaningful patient input throughout drug development and methodological considerations for data collection, reporting, management, and analysis;
- 2. Methodological approaches to develop and identify what is most important to patients with respect to burden of disease, burden of treatment, and the benefits and risks in the management of the patient's disease;
- 3. Approaches to identifying and developing methods to measure impacts to patients that will help facilitate collection of patient experience data in clinical trials;
- 4. Methodologies, standards, and technologies to collect and analyze clinical outcome assessments for purposes of regulatory decision-making;

Cures Act Title III Subtitle A Patient-Focused Drug Development (PFDD)



Section 3002: PFDD Guidance – contd.

- 5. How a person seeking to develop and submit proposed draft guidance relating to patient experience data for consideration by FDA may submit such proposed draft guidance to the Secretary;
- 6. Format and content required for submissions under this section to the Secretary, including with respect to the information described in paragraph (1);
- 7. How FDA intends to respond to submissions of information described in paragraph (1), if applicable, including timeframe; and
- 8. How FDA anticipates using relevant patient experience data and related information to inform regulatory decision-making



- The Patient Voice
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 - Types of Engagement
 - When to engage
- How to prepare



Engagement with CDER

Independent of Specific Drug Development Program

- PFDD meetings, meetings organized by Professional Affairs and Stakeholder Engagement (PASE) staff
 - Focused on better understanding the disease and patient experience.
- Critical Path Innovation Meetings (CPIMs)
 - Communicate and receive general advice on new methodology or technology that may improve efficiency and success in drug development.
- Ad hoc opportunities
 - Typically scheduled with the Review Division
- Qualification programs
 - Biomarkers, clinical outcome assessments, animal models

Drug Development Program Specific

- Formal industry meetings
 - Meetings scheduled with the sponsor by review division
- Patient Representative Program
 - Participate in Advisory Committee meetings, review division meetings, and FDA workshops
- Advisory Committee Meetings
 - Open Public Hearing Portion



Integrating patient perspective into medical product development and decision making

What matters most to patients? What are the most significant impacts of disease? How do we measure this?

What aspects of clinical trials can be better tailored to meet the patients who (might) participate in the trial?

How can patient reported outcome data be best integrated into benefit-risk assessments?

How to best communicate the information to patients and prescribers?

Translational

- PFDD
- Ad hoc meetings
- CPIMs
- Qualification Programs

Clinical Studies

- Patient Representative Program
- •Formal Industry meetings
- CPIMs
- Qualification Programs

Pre-market

review Patient

Representative Program

•Advisory Committee Meetings

Post-market

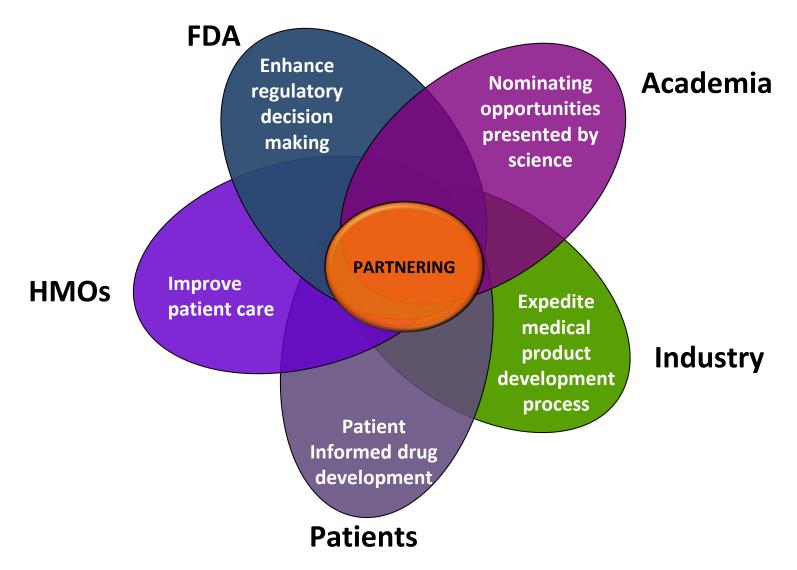
- PFDD
- PatientRepresentativeProgram
- Ad hoc meetings



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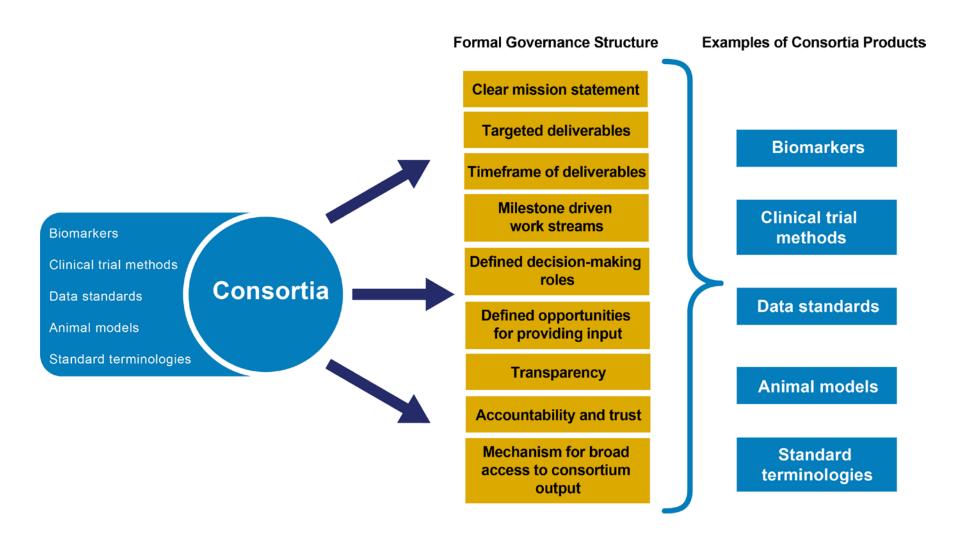
Collaboration is Needed











Reference: Consortium Sandbox: Building and Sharing Resources Mark D. Lim Sci Transl Med 2014;6:242cm6





• CDER is involved in several PPPs to promote development of research tools, platforms, clinical databases, and predictive models to advance knowledge of diseases and safety profiles of drugs.

• For CDER staff to engage with consortia, see our Manual of Policies and Procedures available on our website.

https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ManualofPoliciesProcedures/UCM532571.pdf

MAPP 4100.2

CDER Staff Participation in

Public Private Partnerships and

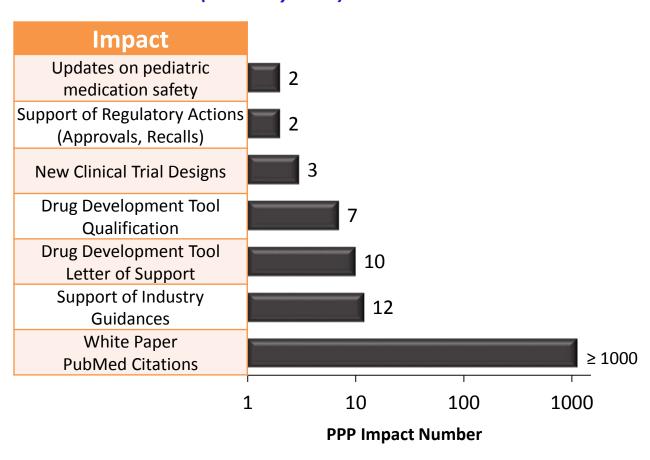
Consortia.

MANUAL OF POLICIES	AND PROCEDURES	
CENTER FOR DRUG EV	ALUATION AND RESEARCH	MAPP 4100.2
	POLICY AND PROCEDURES	8
01	FFICE OF TRANSLATIONAL SCI	ENCES
CDER Staff Pa	rticipation in Public Private Partne	rships and Consortia
	Table of Contents	
	GROUND	
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PROCE	DURES	8
	ENCES	
	TIVE DATE	
	CHMENT 1: FAOs - CDER PPP Lis	
	esponsibilities	
ATTA	CHMENT 2: PPP Clearance Flow Cl	art14
	CHMENT 3: Request for CDER Part	
	or Consortium Activity Form CHMENT 4: CDER PPP Linison Init	
	CHMENT 5: CDER PPP Listion An	
PURPOSE		
The more of this M	APP is to facilitate consistency and co	nimin domeston CDER as
	public Private Partnerships (PPPs) and	
establishes responsibili	ties for those engaged in collaborative	activities with a PPP or
	y an external organization. This MAP	
	in clearance for participation in these a regarding CDER's terms and condition	
	with which we engage.	us tot engagement nom
BACKGROUND		
	PPPs and consortia convened by exter keholder organizations, including non	
	kenoider organizations, including nor ing together to achieve a shared goal	

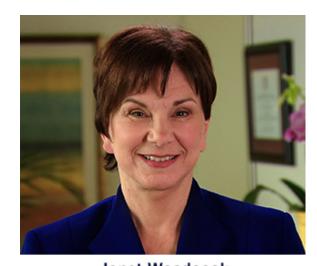




(2004-July 2016)







Janet Woodcock

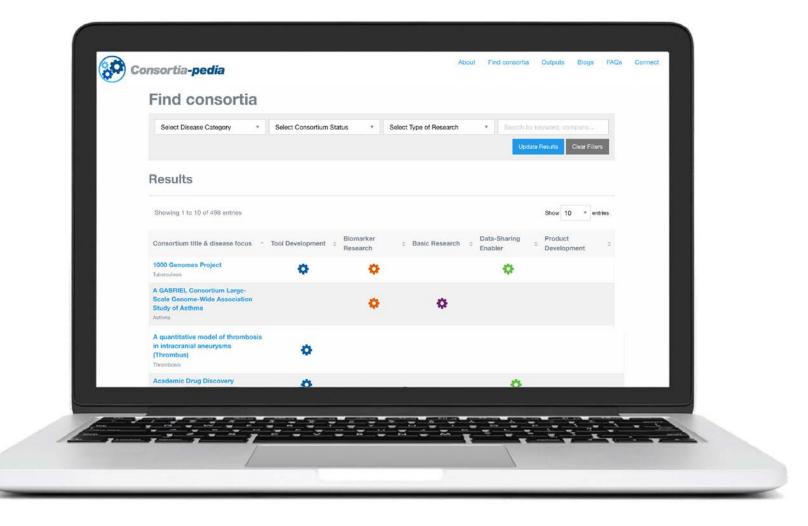
Director, Center for Drug Evaluation and Research,
U.S. Food and Drug Administration

CDER's Janet Woodcock on PPPs -

"Facilitating collaborative partnerships among government, academia, industry, and patients groups is arguably the most important role that CDER plays in supporting advancement of drug development and regulation"



FIND CONSORTIA



http://consortiapedia.fastercures.org/



Resources:

CDER policy and procedures for PPP engagement:

https://www.fda.gov/downloads/AboutFDA/CentersOffices/OfficeofMedicalProductsandTobacco/CDER/ManualofPoliciesProcedures/UCM532571.pdf

Find a consortia - Consortiapedia:

http://consortiapedia.fastercures.org/

Additional information on the impact of PPPs:

https://www.ncbi.nlm.nih.gov/pubmed/28776943





Questions?



Thank you and Acknowledgements

- ShaAvhrée Buckman-Garner, MD PhD
- Ameeta Parekh, PhD
- Kimberly Maxfield, PhD

- Pujita Vaidya, MPH
- Michelle Campbell, PhD

Thank you for your time and consideration ~



Thank you!

Laurie Muldowney
Laurie.muldowney@fda.hhs.gov



Patient Advocate Perspective: Best Practices JAMES VALENTINE, J.D., M.P.H.

www.fda.gov

Developing an Effective Engagement Strategy – Patient Advocate Perspective

CDER Rare Diseases Public Workshop October 30, 2017

James E. Valentine, J.D., M.H.S., Regulatory Counsel



DISCLOSURES









































Overview

- Needs Assessment
- Asset Assessment



NEEDS ASSESSMENT

Deciding what type of engagement is needed



NEEDS

Match your expertise and assets to phases of R&D in your disease/ condition, as well as your own organization's priorities



Targeting needs at the right time

Research questions of interest to your community

- Pre-discovery
- Pre-clinical

Data on unmet need & therapeutic burden

- Pre-discovery
- Pre-clinical
- Clinical
- FDA review

Characterizing the disease & relevant mechanisms

Pre-Discovery



Targeting needs at the right time (cont.)

Inform study eligibility criteria

- Pre-Clinical
- Clinical

Providing translational tools (e.g., animal models, biomarkers)

Pre-clinical

National history database & patient registry info

- Pre-Discovery
- Pre-Clinical
- Clinical
- FDA review
- Post-approval



Targeting needs at the right time (cont.)

Meaningful clinical endpoints, including PROs

- Pre-Clinical
- Clinical

Need for trial adaptations or modifications

Clinical

Benefit-risk preferences

- Pre-Clinical
- Clinical
- FDA Review

Safety surviellance

Post-market

Draft guidance

Pre-Clinical

Feedback on patient experience & trial results

- Clinical
- FDA Review



Lessons Learned on Needs Assessments

- Strive to understand the FDA regulatory framework
- Listen to your industry partners' insights
- Don't let this hold up engaging, this can be part of your first discussion with FDA
- Always keep your own community's priorities foremost

There are limits to what any one patient organization can accomplish alone

2

ASSETS ASSESSMENT

Leveraging your own expertise and assets of value to FDA



ASSETS

Designing your engagement to leverage your organization's skills, experience, capabilities, and resources



Charting your own assets

You bring patient perspectives, experiences, and preferences

- Your organization's broad experience across the community
- Access to patients and their caregivers to query and bring to the table
- Data from meetings, surveys, registries/NH studies, and even online communities/real world information



Charting your own assets (cont.)

You provide important clinical development assets

- Educated advocates
- Understanding of disease mechanisms & natural history
- Financial and organizational support beginning at basic science & discovery

- Translational tools
- Patient preference and benfit-risk assessments
- Patient registries & natural history databases
- Clinical centers of excellence



Charting your own assets (cont.)

You serve as a neutral convener & connecter

- Ability to assemble expertise and tools during each stage of development and review
- Connect FDA with your senior leadership, advisors, and partners beyond the patient perspective (e.g., investigators, KOLs)
- Host workshops & meetings
- Collaborators in public-private partnerships



Your biggest asset

 The foundation of trust you have with your patient community, families, and the clinicians who care for them



Lessons Learned on Asset Assessments

- Be creative, maximize all you've done
- Be transparent and provide disclosure of partnerships and sponsorships
- Use this opportunity to plan future assets based off current and future needs
- Get FDA input when planning future activities

Matching Needs & Assets

PG Engagement Across the Research & Development Continuum

From Bench to Bedside and Back

- Input regarding interest of research question to patient community
- Providing data on unmet need & therapeutic burden
- Fundraising and direct funding for research to identify target molecules
- · Facilitating collaboration with NIH
- Characterizing the disease & relevant mechanisms of action

- Fundraising & direct funding for research, trial operations support
- Assistance in selecting & recruiting optimum clinical sites
- · Clinical infrastructure support
- Helping educate/motivate patient community & recruit for trials
- Providing patient feedback on participant experience
- Serving on Data & Safety Monitoring Board
- · Input for any trial adaptations or modifications
- Performing or participating in benefit-risk and patient preference studies

- Serving on postmarket surveillance initiatives
- Helping return study results to participants
- Co-presenting results
- Publications/communications re: results
- Feedback on how patient community views results
- Natural history database & registry support
- · Working with payers on reimbursement

Prediscovery

Preclinical

Phase I/II/III

FDA Review & Approval

PAS/Outcomes

- · Fundraising and direct funding for research
- Providing translational tools (assays, cell & animal models, biosamples, biomarkers, etc.)
- · Helping define study's eligibility criteria
- · Natural history database & patient registry support
- Input on meaningful clinical endpoints/PROs
- · Assistance on informed consent form/process
- Working with FDA on benefit-risk and draft guidance
- Accompanying sponsor to pre-IND FDA mtg to advocate for study

- Providing public testimony at the FDA Advisory Committee & other FDA hearings
- Preparing submission for newborn screening when appropriate



7000+

Known rare diseases

30 million

People in U.S. living with rare diseases

>4,000

CDER employees



THANKS!

Any questions?

You can find me at jvalentine@hpm.com



DISCUSSION PANEL: DETERMINING YOUR NEXT STEPS

Moderator: Meredith Cagle, M.P.H

Panelists:

Jonathan Goldsmith, M.D. John Whyte, M.D., M.P.H.

Billy Dunn, M.D. Rosangel Cruz, M.A.

Isabelle Lousada James Valentine, J.D., M.P.H.

Steve Roberds, Ph.D. Henrietta Hyatt-knorr, M.A.

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Closing Remarks MEREDITH CAGLE, M.P.H. FRANCIS KALUSH, PH.D.

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THANK YOU AND SAFE TRAVELS!

Share your feedback:

PASE-Rare-Diseases@fda.hhs.gov





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