

# Optimizing Dose Selection Strategies in Oncology

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Society for Clinical Trials Annual Meeting

May 22, 2023

# Contributors

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- Laura Levit, JD, American Society of Clinical Oncology (moderator)
- Julia Maues, Patient-Centered Dosing Initiative
- R. Donald Harvey, PharmD, Emory University School of Medicine
- Sumithra Mandrekar, PhD, Mayo Clinic Department of Pediatric and Adolescent Medicine
- Elizabeth Garrett-Mayer, PhD, American Society of Clinical Oncology
- Mirat Shah, MD, U.S. Food and Drug Administration

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# Drug Dosing: The Patient Perspective

Society for Clinical Trials  
Annual Meeting 2023

Julia Maués  
Patient-Centered Dosing Initiative

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not  
always

# Cancer drug dosing: More is better

- Cancer drugs dosing has historically been determined using phase 1 dose escalation studies, often by moving forward with the MTD
- Based on the premise that higher toxicity → greater efficacy
- Premise not exactly relevant for new treatments: targeted therapies & immunotherapies
- Does not consider long-term treatment-related SEs
- TOLERATED by whom? For how long?



# PCDI: Patient-Centered Dosing Initiative

We are a patient-led initiative questioning the practice of routinely treating Metastatic Breast Cancer patients with the highest tolerable dose.

- MBC isn't curable but can be treated, often for years, in some cases even decades.
- We don't just want to live LONGER, we also want to live WELL – quantity AND quality.
- Evidence suggests that lower allowed doses of some MBC drugs may be as effective as the Recommended Started Dose (usually based on MTD).
- Anecdotally, we have seen that several long-term survivors are on reduced doses of medications for various reasons, and that plays a role in how they have been able to tolerate these treatments.

# Patient-Centered Dosing Initiative

## Patient Members



Anne Loeser



Martha Carlson



Janice Cowden



Christine Houser



Sheila Johnson



Julia Maués

## Advisory Board Members



Aditya Bardia, MD



Mark Burkard, MD



Kevin Kalinsky, MD



Maryam Lustberg, MD



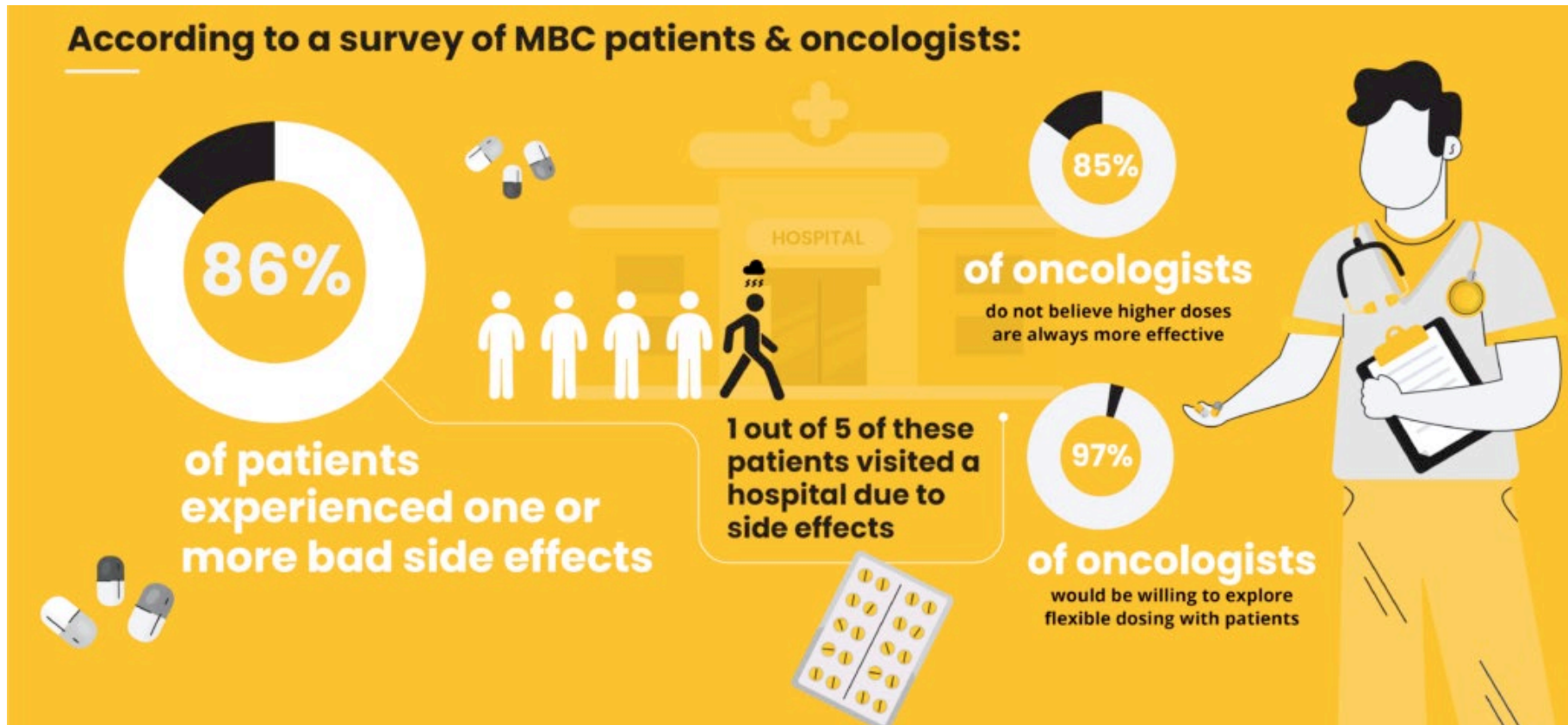
Hope Rugo, MD

# PCDI Goal

When prescribing a medication, and throughout the treatment for Metastatic Breast Cancer, the clinician and patient should discuss drug dosage, considering the patient's personal wishes and unique characteristics such as age, availability of at-home care, history of side effects and more.

# 2 Surveys: Patient and Oncologist

- 1,221 patients with MBC & 119 oncologists participated in the respective surveys



# PCDI Exposure

- Patient Survey Results at ASCO '21 & two “Best of ASCO” Malaysia & Sri Lanka (oral presentations)
- Pan-Amazonian Oncology Conference '21 (oral presentation)
- Friends of Cancer Research Annual Meeting '21 (panelist)
- Oncologist Survey at SABCS '21 (poster)
- FDA OCE “More Isn’t Always Better: Understanding Cancer Treatment Tolerability,” March '22 (panelist)
- FDA & ASCO Workshop “Getting the Dose Right: Optimizing Dose Selection Strategies in Oncology,” May '22 (panelist)
- Optimum Cancer Care Alliance '22 Annual Meeting (oral)
- AAADV '22 (oral)

2021 ASCO ANNUAL MEETING

TREATMENT-RELATED SIDE EFFECTS AND VIEWS ABOUT DOSAGE ASSESSMENT TO SUSTAIN QUALITY OF LIFE:  
RESULTS OF AN ADVOCATE-LED SURVEY OF PATIENTS WITH METASTATIC BREAST CANCER (MBC)

Anne Loeser,\* Jeffrey Peppercorn, Mark E. Burkard, Kevin Kalinsky, Hope Rugo, Aditya Bardia

\* Founder, Patient-Centered Dosing Initiative

#TheRightDose

Oral Abstract Session: Breast Cancer—Metastatic

PATIENT-CENTERED DOSING: ONCOLOGISTS' PERSPECTIVES ABOUT TREATMENT-RELATED SIDE EFFECTS AND HOW PATIENTS WITH METASTATIC BREAST CANCER (MBC) PERCEIVE THE STANDARD DOSE OF A CANCER DRUG IS ALWAYS MORE EFFECTIVE THAN A LOWER DOSE

Anne Loeser, Aditya Bardia, Mark E. Burkard, Kevin Kalinsky, Jeffrey Peppercorn, Hope E. Rugo, Mark E. Burkard, Anne Burstein, Anne Burstein, and Benjamin Leshem

**ABSTRACT**

**OF THE MEDICAL ONCOLOGISTS SURVEYED**

- 85% Do not believe that the standard dose of a cancer drug is always more effective than a lower dose
- 97% Would be willing to engage in physician-patient dialogues to identify the best dose for the patient

**CONCLUSIONS**

ONCOLOGISTS OBSERVED THAT A CONSIDERABLE PERCENT OF PATIENTS WITH MBC EXPERIENCE DISTRESSING TREATMENT-RELATED SIDE EFFECTS:

- Many patients reported side effects
- Dose interruptions were common

**THE MAJORITY OF ONCOLOGISTS:**

- Did not believe the standard dose is always more effective than a lower dose
- Would be willing to engage in physician-patient dialogues to identify the best dose for the patient

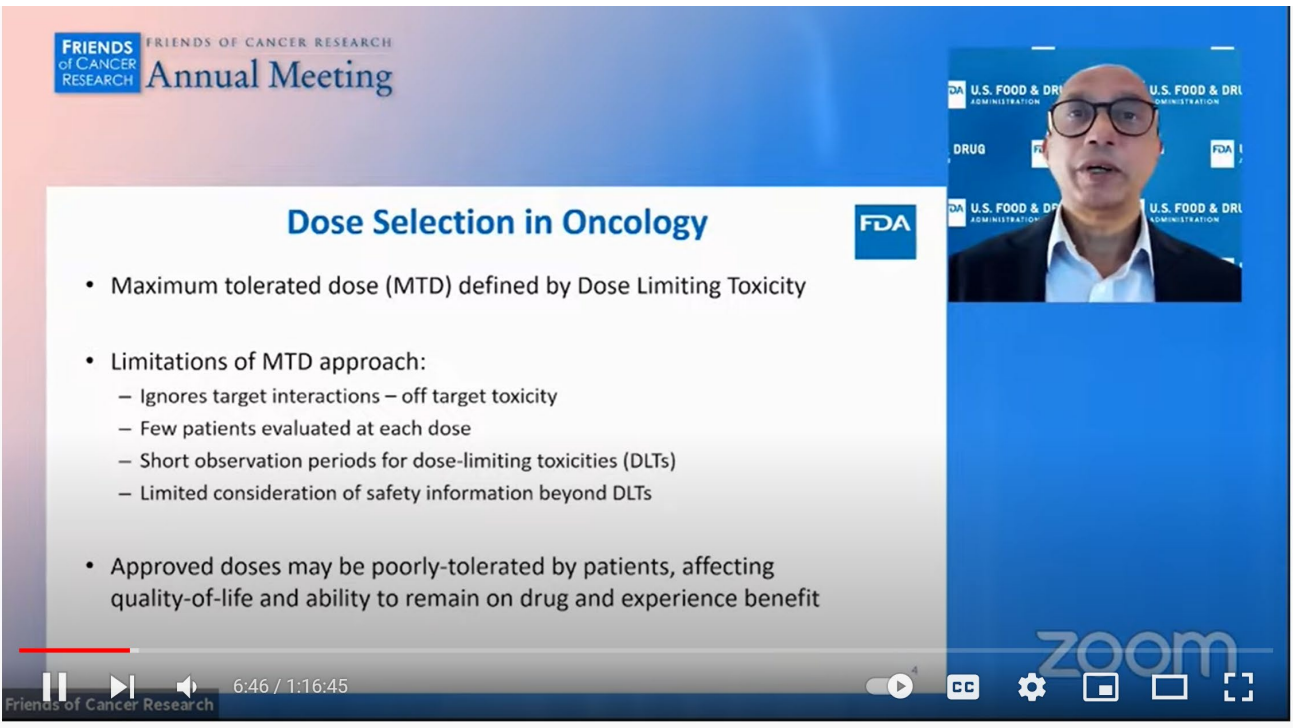
**PCDI INITIATIVE**

**ACKNOWLEDGMENTS**

Poster P4-10-09

# The idea gained traction with the FDA

Dr. Atik Rahman, FDA Division Director  
Friends of Cancer Research Annual Meeting, Nov. 2021



**FRIENDS of CANCER RESEARCH Annual Meeting**

### Dose Selection in Oncology

- Maximum tolerated dose (MTD) defined by Dose Limiting Toxicity
- Limitations of MTD approach:
  - Ignores target interactions – off target toxicity
  - Few patients evaluated at each dose
  - Short observation periods for dose-limiting toxicities (DLTs)
  - Limited consideration of safety information beyond DLTs
- Approved doses may be poorly-tolerated by patients, affecting quality-of-life and ability to remain on drug and experience benefit

U.S. FOOD & DRUG ADMINISTRATION

zoom

6:46 / 1:16:45

“It’s loud and clear from our patients that the drugs are too toxic... Patients deserve a more tolerable dose.”

# Real change is happening

FDA's **Project Optimus** encourages sponsors to evaluate exposure-response, efficacy, and safety data from early trials to inform dose selection instead of automatically selecting the MTD.

When the approved dose and schedule of an approved drug is suboptimal, the FDA may issue **post-marketing requirements (PMRs)** for clinical trials evaluating additional dosages.

For the clinic, PCDI encourages **physician-patient discussions about the right dose for the right patient.**

This will remain important because:

- Approved drugs currently on the market continue to be prescribed based upon the MTD
- It will take time for drug development to actualize the new paradigm
- Patients' responses in the real world can differ from those clinical trial participants because they are not subject to rigid inclusion/exclusion criteria
- Patients have unique personal attributes (co-morbidities, drug sensitivities, etc.)

# PCDI Patient Education Flyer

## Patient-Centered Criteria



### YOU MAY START THE CONVERSATION WITH YOUR DOCTOR BY SAYING:



"We both want the same things"

"I want to have the longest possible life with the best possible Quality of Life"

"You want that for me too!"

"Let's work together to achieve this!"

## Do You Have Stage IV/Metastatic Breast Cancer (MBC)?

MBC IS BREAST CANCER THAT HAS SPREAD BEYOND THE BREAST TO OTHER PARTS OF THE BODY, MOST COMMONLY THE BONES, LUNGS, LIVER, AND BRAIN

IF YOU'RE EXPERIENCING (OR CONCERNED ABOUT) TREATMENT-RELATED SIDE EFFECTS SUCH AS NAUSEA, FATIGUE, RASH, ETC. **YOU ARE NOT ALONE!**



A SURVEY<sup>1</sup> OF 1,221 PATIENTS WITH MBC FOUND THAT:

86%

86% HAD AT LEAST ONE BAD TREATMENT-RELATED SIDE EFFECT

### YOU AND YOUR DOCTOR MAY WANT TO DISCUSS:

1. Your personal goals, wishes, and desires
2. Your general health situation (other illnesses/conditions)
3. History of side effects from other drugs
4. Current and past blood counts
5. Whether the disease is slow- or fast-growing
6. Whether any organs are severely affected, or the disease is in the brain
7. Your body mass index (level of body fat)
8. Affordability of medications to ease your side effects
9. If you need help at home, is anyone available?

If you have side effects, speak with your doctor about ways to relieve them.

Your doctor may be able to:



- Prescribe medication for relief
- Adjust your dose
- Revise your treatment schedule
- Recommend a different treatment
- Suggest something else to make you feel better



**NEVER** change anything about your treatment on your own; always speak with your doctor!



<sup>1</sup>Loeser, et al. ASCO Annual Worldwide Meeting, June 2021

Questions/Comments: Visit the Patient-Centered Dosing Initiative at [TheRightDose.org](http://TheRightDose.org) or email [info@TheRightDose.org](mailto:info@TheRightDose.org)

The material in this flyer is solely for informational purposes and is not a substitute for professional medical advice or treatment. If you use and/or act upon information in this flyer, you assume full responsibility, and you understand and agree that the Patient-Centered Dosing Initiative and its members are not responsible or liable for any claim, loss, or damage resulting from its use by you or any user. If you have questions about your disease, treatment, and/or side effects, speak with your doctor or other qualified health care provider, and never change anything regarding your treatment without obtaining medical advice from your clinician.



#TheRightDose

# Benefits for Patients

As a result of fewer toxicity-related side effects, patients may:

- Have less need for emergency care
- Miss fewer treatments
- Potentially remain on a working treatment longer
- Take broader advantage of the full complement of available treatments
- Experience a better Quality of Life

...And possibly,  
just possibly,

EVEN LIVE LONGER



# Benefits for Oncologists

Medical oncologists want the same things for their patients that patients themselves want: A longer life with better quality.

- “Just because you have cancer and are on treatment doesn’t mean you have to be miserable”

Dr. Eric Winer  
Yale Cancer Center Director & ASCO President



PCDI Patient Member Sheila Johnson and her oncologist of 12 years, Dr. Cynthia Ma.



# Benefits for Payers

Cost savings resulting from fewer and less severe patient SEs:

- Fewer specialist visits for side effect mitigation
- Decreased need for palliative medications
- Reduced absenteeism from work
- Less demand for emergency/hospital care



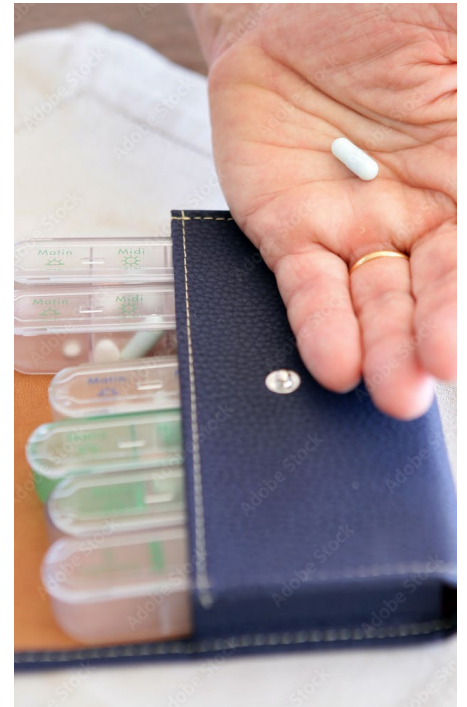
# Benefits for Industry

## In Clinical Trials:

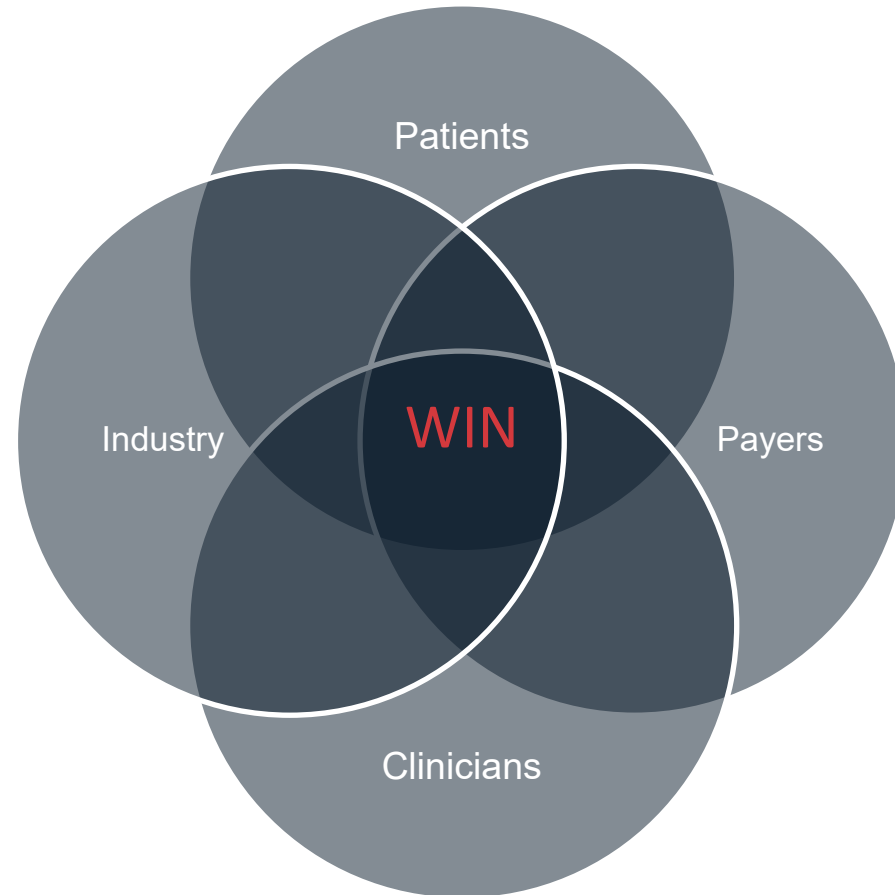
- Dose optimization early in the drug development process reduces the risk of clinical holds or post-marketing requirements
- If patients can remain on an investigational drug with fewer toxicities, attrition may decrease

## In the “Real World”:

- If patients don't have to stop taking a treatment that is working due to SEs, they can remain on it longer, and sales will increase
- If patients miss fewer treatments due to reduced toxicities, sales will increase



# Cancer Drug Dosing: A New Era



# Thank you!



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[@itsnot\\_pink](https://www.instagram.com/itsnot_pink)

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# The Challenges and Opportunities for Dose Optimization in Oncology – How Did We Get Here?

R. Donald Harvey, PharmD, BCOP, FCCP, FHOPA  
Professor, Hematology/Medical Oncology and  
Pharmacology  
Medical Director, Clinical Trials Office  
Director, Phase I Clinical Trials Section



# Disclosures

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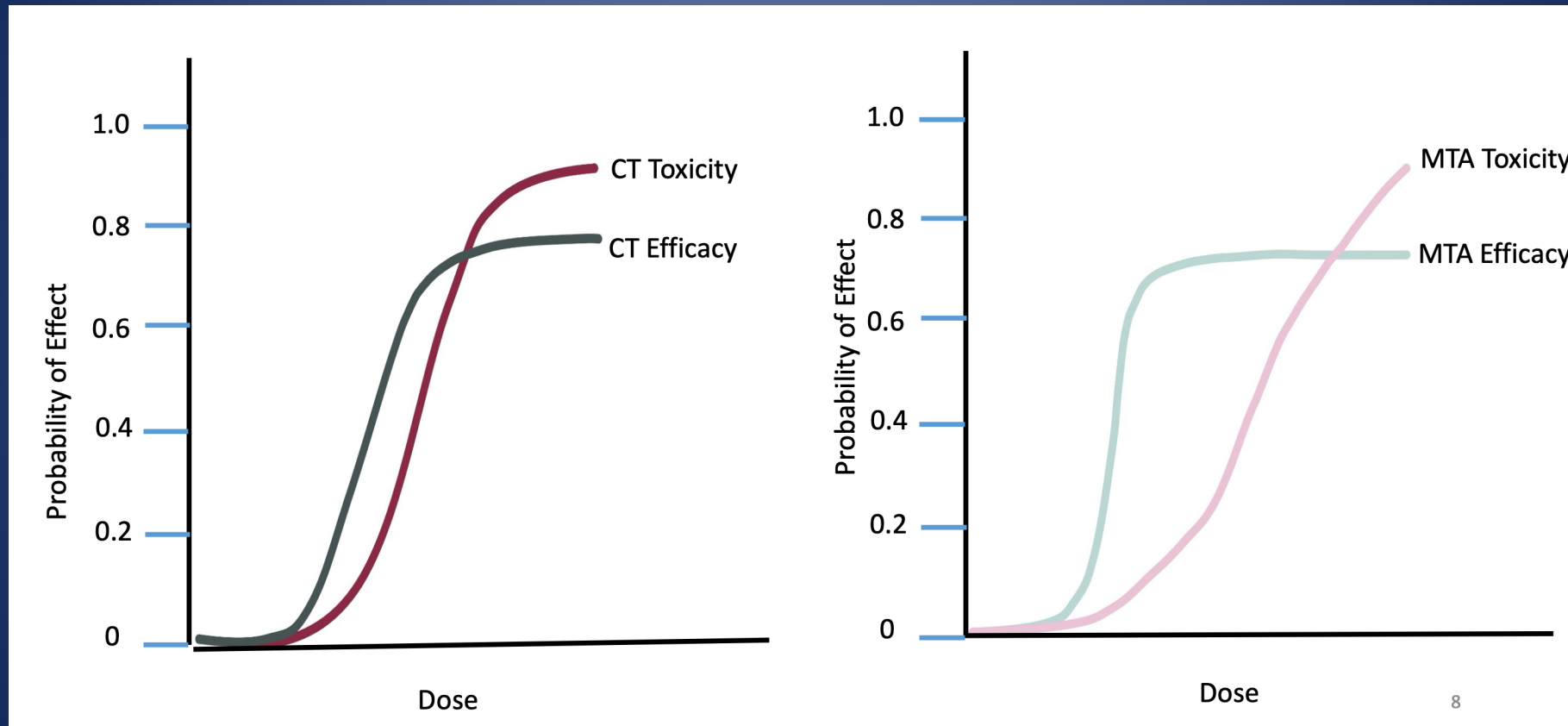
- Research funding to my institution that supports my salary: Abbisko, AbbVie, ADC Therapeutics, Amgen, Bayer, Bristol-Myers Squibb, GlaxoSmithKline, Incyte, InhibRx, Janssen, Merck, Meryx, Morphosys, Novartis, Pfizer, Sanofi, Takeda, Turning Point Therapeutics, Xencor
- Consultant: Amgen, Erasca, Janssen

# Phase 1 Trial Historical Thinking and Design

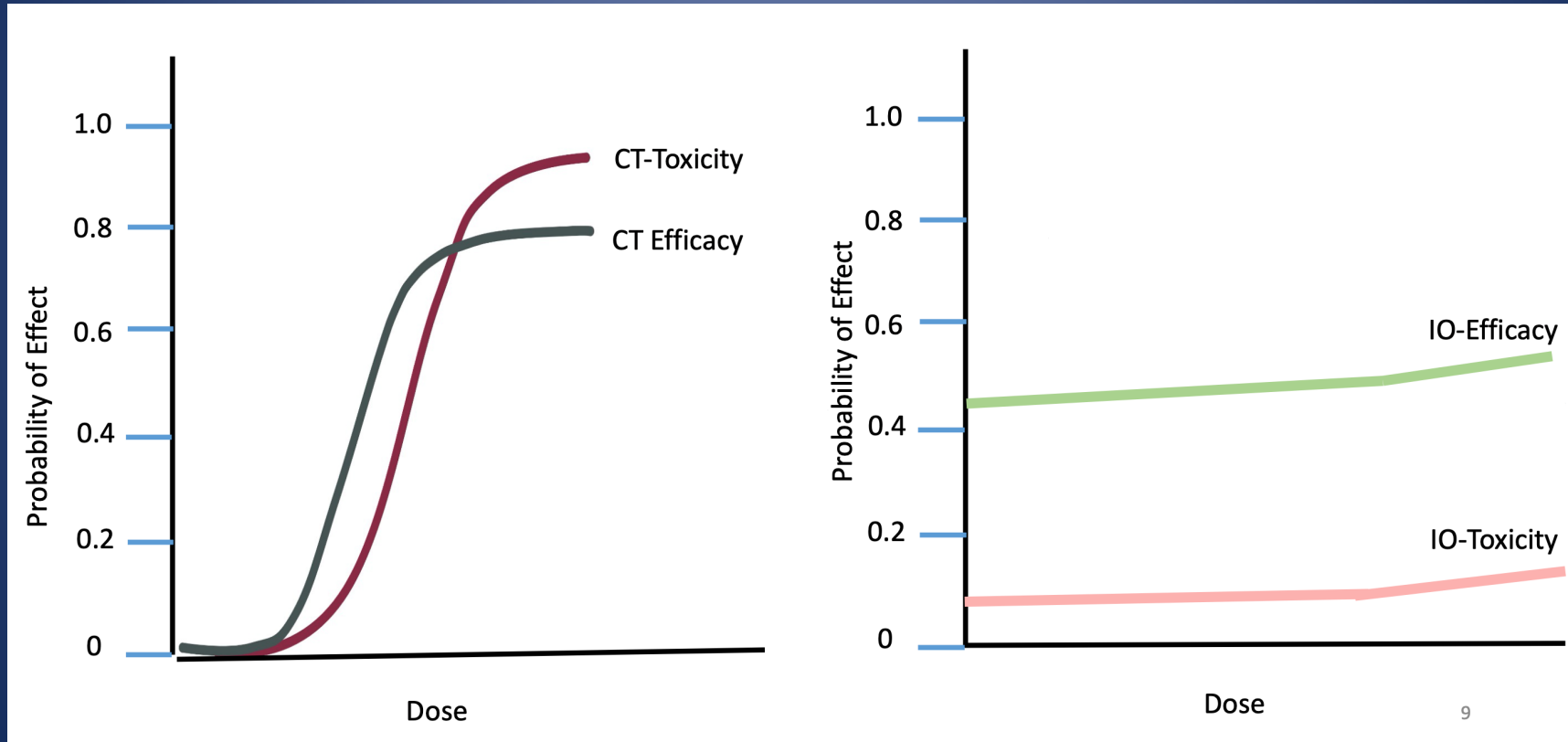
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- Solely based on cytotoxic chemotherapy paradigm
  - Dose-response relationships are linear
    - Narrow therapeutic indices
  - The most concerning adverse events are seen in the first 3-4 weeks after treatment initiation (cycle 1)
  - Very few oral, chronically administered agents
  - Treatment duration limited
- Application to novel agents doesn't work

# Cytotoxic versus Molecularly Targeted Agents (MTAs)



# Cytotoxic versus Molecularly Immunology (IO) Agents



# The Fallacy of Relying Solely on Cycle 1 Toxicity Reporting

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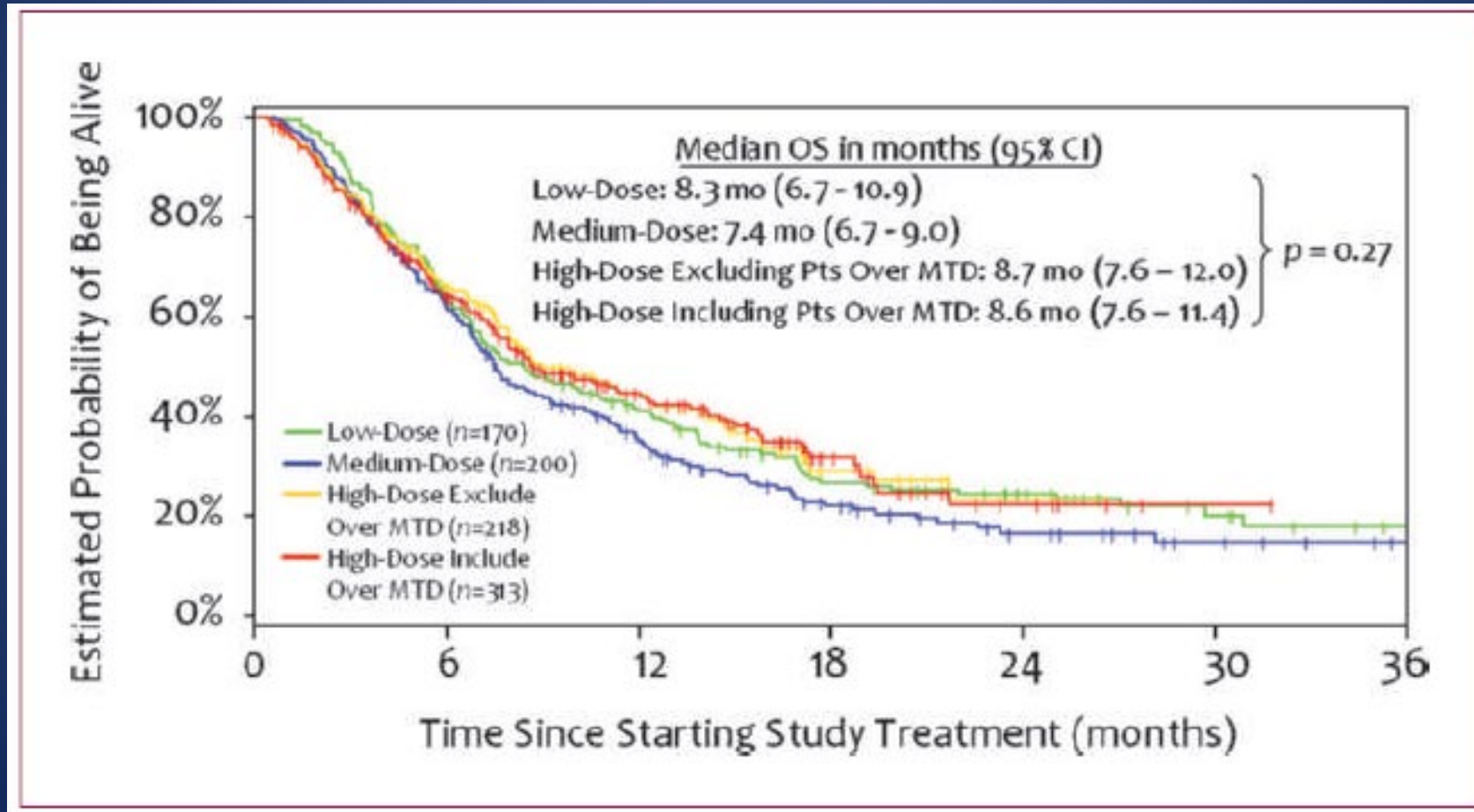
- Recommended phase 2 doses come from cycle 1 grade 3 or higher toxicity measures
- Limitations
  - Adherence to therapy for molecularly targeted agents that yield clinical benefits for prolonged periods
  - Many intolerable chronic grade 2 toxicities not reported
  - Historical example - Capecitabine
    - “In combination with docetaxel, the recommended dose of is 1250 mg/m<sup>2</sup> twice daily for 2 weeks followed by a 7-day rest period, combined with docetaxel at 75 mg/m<sup>2</sup> as a 1-hour IV infusion every 3 weeks
    - Dosage may need to be individualized to optimize patient management”

# Dose-Response Relationships of Targeted Agents

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- Evaluation of 683 patients in 24 trials categorized by % of MTD received
  - Low ( $\leq 25\%$  of MTD)
  - Medium (25-75% of MTD)
  - High (75-100% of MTD)
- Baseline demographics similar among dose levels
  - Age = 55
  - PS = 1 (~ 60%)
  - GI cancer ~ 30%

# Dose-Response Relationships of Targeted Agents



# Causes of Getting the Dose Wrong

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- Focus on more rapid, targeted development
  - Smaller sample sizes
- Restrictive eligibility criteria
  - Comorbidities, performance status, organ function, prior lines of therapy
- Limited to no focus on cycle 2+ toxicities for dose selection
  - Chronic grade 2 adverse events

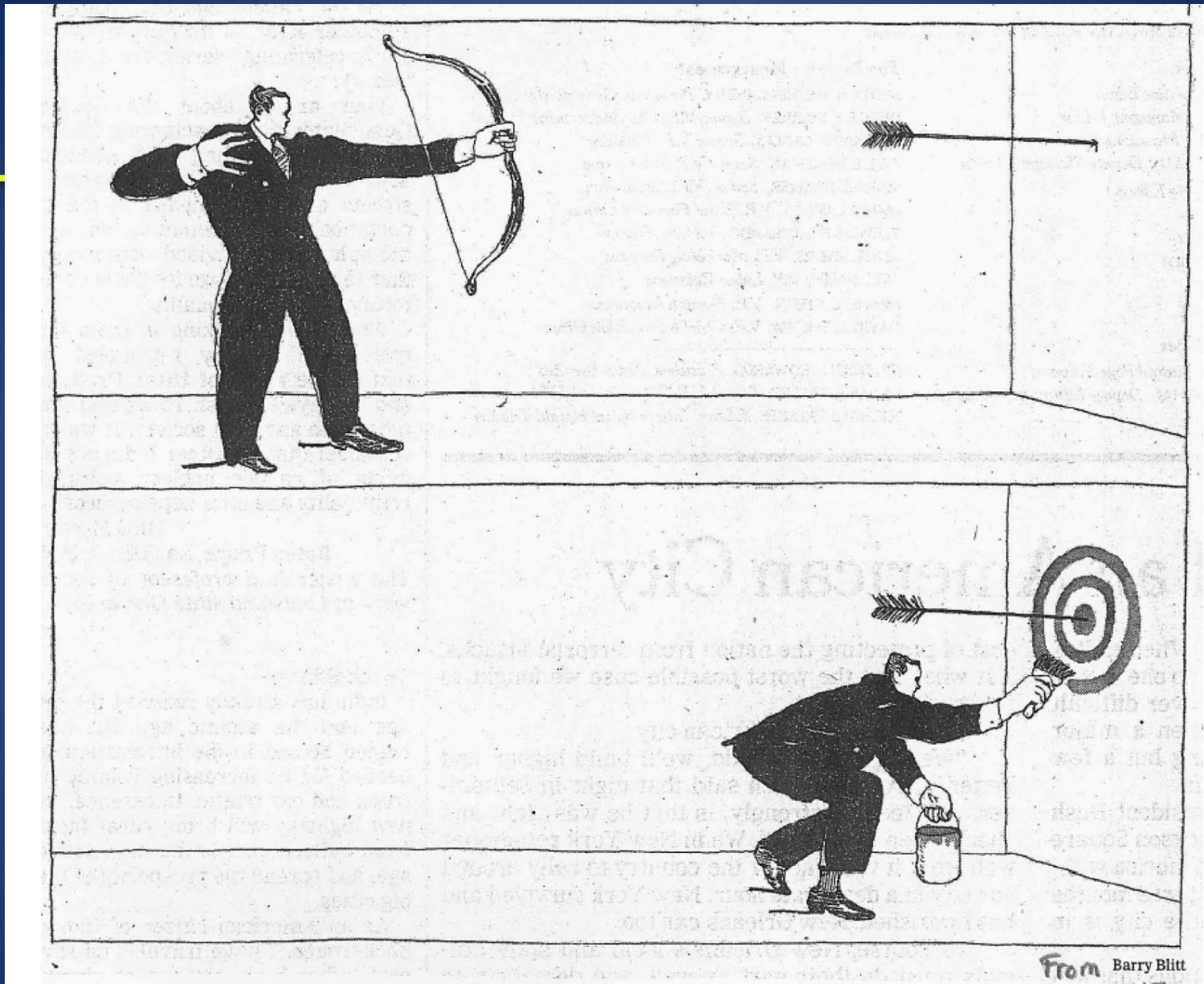
# Impact on Patients

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- Toxicity without added disease benefit
  - Quality of life decrements, early discontinuation
- Physician reluctance to use agent in subsequent patients and/or at labelled doses
- More rapid cycling of treatment lines
- Less public trust in the development process

# How Do We Correct Course?

Whether?	When?	How?
<ul style="list-style-type: none"><li>• Approved doses of many agents excessive (eg, capecitabine)</li><li>• Trial populations ≠ post-approval populations</li><li>• Patient perspective rarely included in dose decisions</li><li>• Flat dose-response curves for many oral small molecules</li></ul>	<ul style="list-style-type: none"><li>• Activity shown <u>and</u> narrow therapeutic index</li><li>• Earlier<ul style="list-style-type: none"><li>• Optimal for development efficiency</li><li>• May not have large numbers of responses for planning</li></ul></li><li>• Later<ul style="list-style-type: none"><li>• Potential for higher likelihood of confidence in data with <math>\geq 2</math> doses</li><li>• Potential for even higher numbers of patients receiving suboptimal or toxic dose</li></ul></li></ul>	<ul style="list-style-type: none"><li>• Assess need by agent and potentially class</li><li>• Include and analyze all data gathered</li><li>• Increase numbers of observations across doses</li><li>• Focus more on defining therapeutic index across clinical and nonclinical data</li><li>• Incorporate time (schedule) into dose decisions</li><li>• Approve a range of doses</li><li>• Utilize therapeutic drug monitoring</li></ul>



Slide courtesy of Merrill Egorin, MD



# Endpoint and Design Considerations for Dose Optimization Trials

**Sumithra J. Mandrekar**

Professor of Biostatistics and Oncology  
Mayo Clinic

SCT Invited Session  
Optimizing Dose Selection Strategies in Oncology

May 22, 2023, Baltimore, MD

No relevant disclosures for this talk

### Consulting or Advisory Role

- Flatiron Health
- Harbinger Oncology, Inc

### Leadership roles

- Group Statistician and Program Director, Alliance and AFT
- Co-Chair: CTAC SCTWG, NCI SCTIC

# Early Phase Trials: Characteristics

- Small sample size, usually in the range of 20-60 patients
- Extensive data collection
  - Large n (factors) from a small N (patients)
  - Heterogenous (different histology/tumors/markers/dose levels/schedules)
- Data collected:
  - Adverse events: across different body systems, across multiple cycles
  - Attribution or relatedness to study treatment(s)
  - Late-onset and long-term effects
  - PRO, biomarkers, clinical outcomes etc.
- Data used:
  - Binary data points (DLT)
  - Cycle 1 data for dose selection
  - Single/binary efficacy measure

# Trial Optimization: What Does it Entail?

- **Endpoints/outcomes**
  - **Tolerability**
    - Unacceptable rate of adverse events
    - Time to all treatment discontinuation
    - Dose delays, interruptions, dose reductions/changes
    - Patient reported adverse events (PRO CTCAEs)
  - **Efficacy**
    - Biomarker/molecular changes and expression levels
    - Clinical outcomes: Tumor shrinkage, Progression, survival
    - Patient reported outcomes (composite endpoints)
    - Using PK to guide dose escalation
- **Design elements**
  - Algorithm based, Model Assisted, Model based
  - Dose escalation and Dose expansion (randomized?)
  - Accounting for missing/incomplete data

# Trial Optimization: What Does it Entail?

- **Trial Population**

- Heterogenous mix: tumor types, molecular profiles, patient demographics
- Assess the safety/efficacy within homogenous subgroups
  - biomarker defined
  - tumor/histology focused
  - under-represented populations (minorities, older/frail, gender)

- **Streamlining Data Collection**

- Number and frequency
- Examples:
  - **Adverse events**
    - Multiple cycles, multiple grades, multiple types of events
    - Long term effects
    - Relationship to study treatment(s)
    - Timing of occurrence of AE
    - PRO CTC AEs
  - **Dosing Data**: schedule (continuous, intermittent), mode of administration (IV vs. oral); fixed vs. based on body surface area, frailty etc.

# Endpoints

# Adverse Event Burden Score

- AE burden by treatment cycle: weighted sum of the AEs reported in each cycle  $t$ .

$$B(t) = \sum_k \sum_g w_{kg} Y_{kg}(t) , k = \text{type and } g = \text{severity grade}$$

- AE burden overall score: Average (or total) across all treatment cycles

$$TB = \sum_t u_t B(t)$$

- Weight considerations
  - Well defined a priori, and the same weight function must be used if comparing across trials
  - For example: severity grade for grade 1-4 events; and 10 for grade 5 events

# Dual Endpoint Design

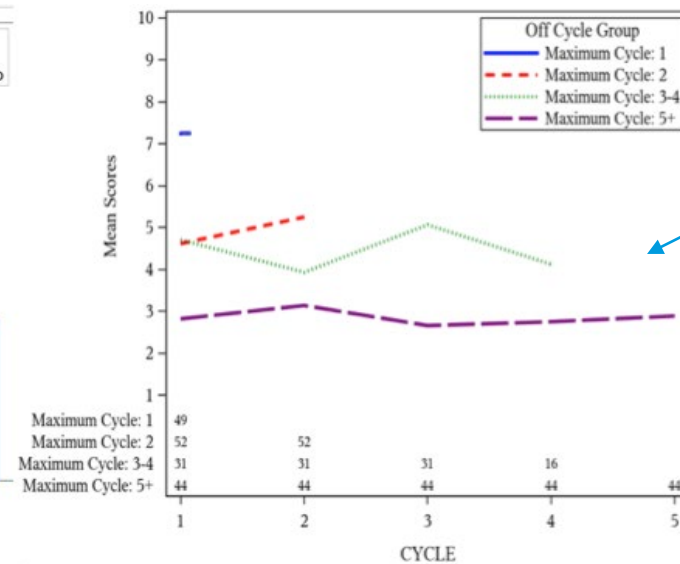
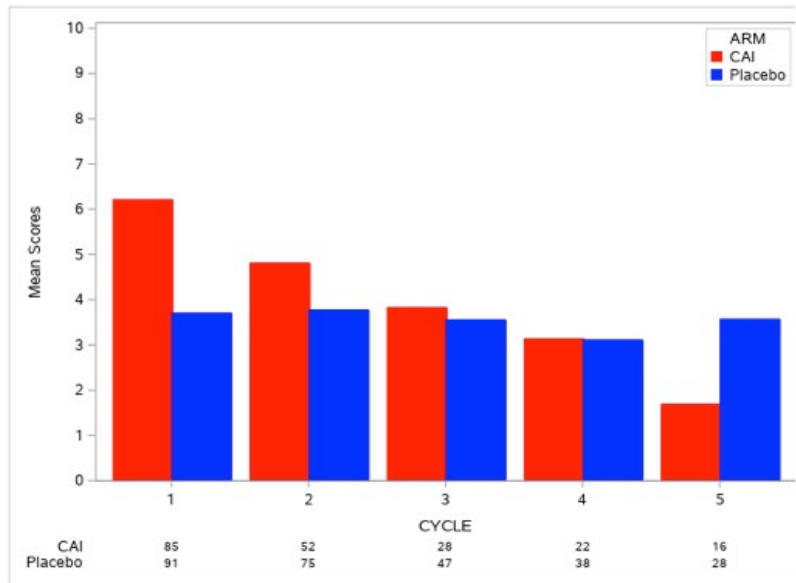
## AE burden score + Efficacy Measure

- A continuous score
- Incorporates multiple AE types and grades
- Incorporates AE data from multiple cycles of treatment for each patient

Novel Treatment Features	Our Design Features
Mild, moderate Toxicities	Lower grade toxicities (grade 1-2) are included.
Late, cumulative Toxicities	Repeated measures of subsequent treatment cycles are included
Non-monotonic relationship of dose and efficacy	Incorporates plateau shape of efficacy

- **Repeated Measures Design**: TTP and continuous efficacy outcome (patient QOL / clinical / biomarker)

# NCCTG 97-24-51 RESULTS



CAI Arm  
Mean AE Score

1. AE burden in CAI arm was higher in the early period but decreased over time due to patients going off treatment early due to AEs.
2. AE burden in the placebo arm was relatively flat over the 5 treatment cycles.
3. Patients in CAI with higher AE burden went off treatment early.



Article

## Adverse Event Burden Score—A Versatile Summary Measure for Cancer Clinical Trials

Jennifer G. Le-Rademacher <sup>1,\*</sup>, Shauna Hillman <sup>1</sup>, Elizabeth Storrick <sup>1</sup>, Michelle R. Mahoney <sup>2</sup>, Peter F. Thall <sup>3</sup>, Aminah Jatoi <sup>4</sup> and Sumithra J. Mandrekar <sup>1</sup>

# A041202 TRIAL RESULTS

## IBRUTINIB REGIMENS VERSUS BENDAMUSTINE/RITUXIMAB

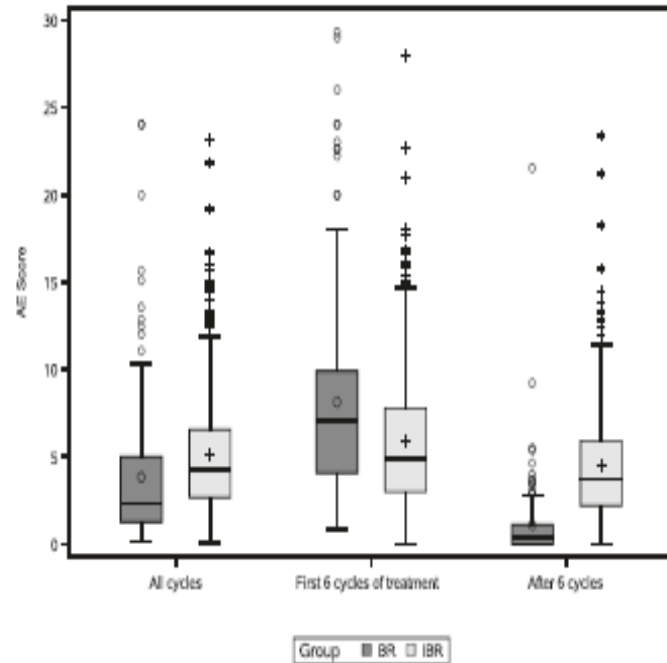


Fig. 2 AE score by treatment group, across all assessments/cycles, the first 6 cycles of treatment, and after 6 cycles of treatment.

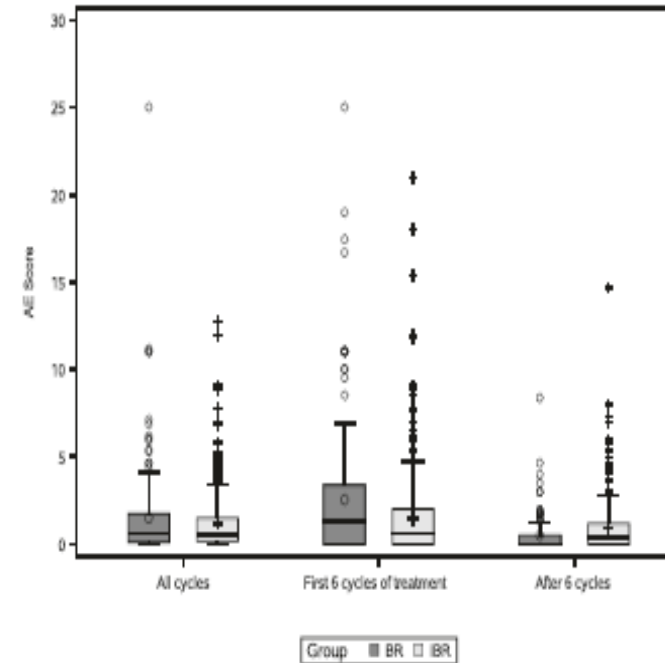


Fig. 3 Limited to grade 3/4 AEs, AE score by treatment group, across all assessments/cycles, the first 6 cycles, and after 6 cycles.

Ruppert et al., Leukemia, 2021

# Design

**TABLE 1.** Comparison of Design Characteristics Among Algorithm-Based, Model-Based, and Model-Assisted Phase I Designs

Design Characteristic	Algorithm Based	Model Assisted	Model Based
<b>Transparency and simplicity</b>			
Dose escalation/de-escalation rule can be predetermined and included in the protocol	Yes	Yes	No
Avoids computation-intensive, repeated estimation of the dose-toxicity curve model to make interim decisions	Yes	Yes	No
<b>Flexibility</b>			
Targets any prespecified DLT rate	No	Yes	Yes
Allows decision making when the cohort size deviates from the planned size	No	Yes	Yes
No. of patients treated at the MTD can be > 6	No	Yes	Yes
Sample size can be calibrated to ensure good operating characteristics	No	Yes	Yes
<b>Performance</b>			
Identifies the MTD accurately	No	Yes	Yes
Allocates a high percentage of patients to the MTD	No	Yes	Yes
Provides good overdose control	Yes	Yes	Yes

Abbreviations: DLT, dose-limiting toxicity; MTD, maximum-tolerated dose.

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Abbreviations: DLT, dose-limiting toxicity; MTD, maximum-tolerated dose.

# Simulation Considerations: Trial Conduct and Design Elements

- **Components of the design**
  - Plausible Scenarios for dose-toxicity/dose-efficacy
    - Number of patients to treat at a dose level
    - Unacceptable toxicity threshold/acceptable efficacy bounds
  - Accrual patterns and rates
    - Missing data, treatment/schedule compliance
  - Patient characteristics
  - Patient outcomes
- **Decision rules for escalation and expansion**
  - Timing, maturity of data to use in dosing decisions
  - Pre-specified adaptations: randomization ratios; inclusion/exclusion; dose selection; adding/dropping arms; subgroup selection
- **Final summary**
  - Operating characteristics; dose range recommendations

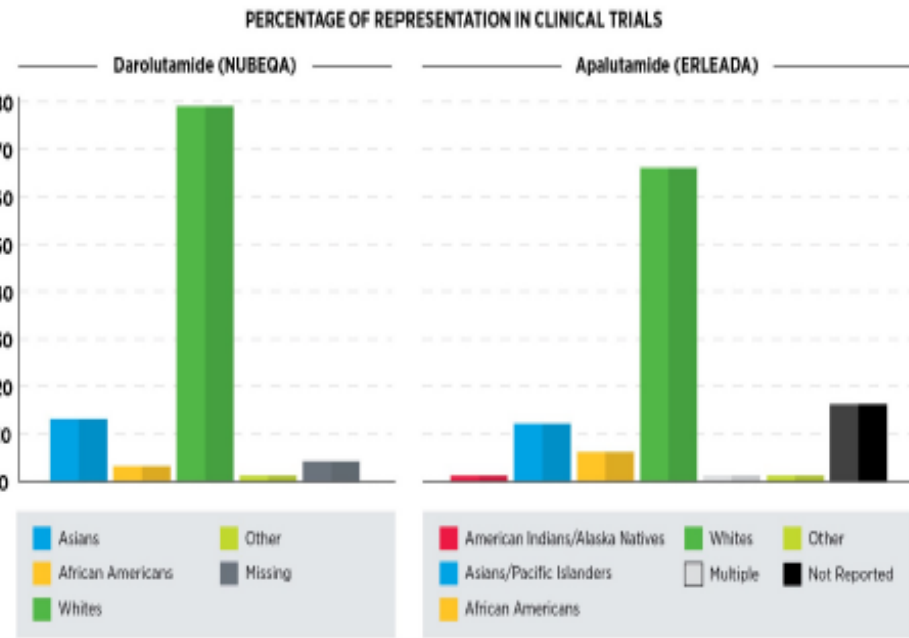
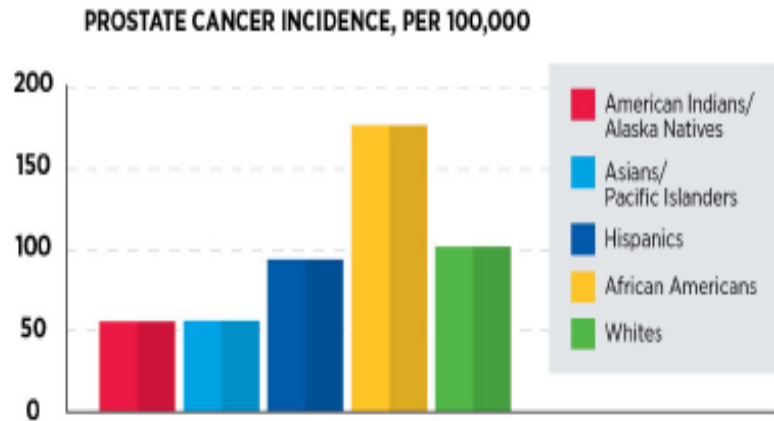
# Trial Population

# Inadequate Representation in Clinical Trials...

- Perpetuates inequities in healthcare
- Limits the generalizability of clinical trial results
  - Biomarker expression may differ by race or ethnicity
- Contributes to the efficacy-effectiveness gap

[Phillips et al. Cancer. 2020 Apr 15;126\(8\):1717-1726.](#)

# Racial and Ethnic Minorities and Other Medically Underserved Populations are Underrepresented in Oncology Clinical Trials



**Table 4. Race/ethnicity of US patients in Phase I clinical trials in oncology compared with US demographics and cancer incidence.**

Race/ethnicity	US patients (%)	US Census <sup>†</sup> (%)	SEER data <sup>‡</sup> : 2013–2017 age-adjusted cancer incidence per 100,000
White/Caucasian	84.2	76.5	452.1
Black/African-American	7.3	13.4	440.4
Asian	3.4	5.9	302.0 <sup>§</sup>
Native Hawaiian/Pacific Islander	0.1	0.2	NR <sup>§</sup>
American-Indian/Native Alaskan	0.1	1.3	310.1
More than one race	0.0	2.7	NR
Other/unknown	3.7	–	NR
Hispanic/Latino	2.8	18.3	348.4

<sup>†</sup>Source: US Census Bureau. Population Estimates, July 2019 (<https://www.census.gov/quickfacts/fact/table/US>).

<sup>‡</sup>Source: Surveillance, Epidemiology and End Results (SEER) Program. 5-Year age-adjusted incidence rates, 2013–2017 for all cancers (<https://seer.cancer.gov/explorer/>).

<sup>§</sup>Hawaiian/Pacific Islander included with Asian.

NR: Not reported; SEER: Surveillance, Epidemiology and End Result.

# Streamlining Data Collection

# Candidate Data Categories to Streamline

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- **Adverse events**
  - Low-grade
  - Attribution and start/stop times
- **Laboratory data**
  - Beyond standard of care
  - Unrelated to study endpoints or safety monitoring
  - Unused components of panels
- **Imaging**
  - Beyond standard of care
- **History and Physical**
  - Concomitant medication, start dates for concomitant medications not linked to protocol eligibility or safety
  - Start dates for histories not linked to protocol eligibility or safety
  - Patient position and resting status for vital signs



**Thank you for your attention**

mandrekar.sumithra@mayo.edu

*Society for Clinical Trials Annual Meeting*

*May 2023*

# Randomized Dose Finding Studies

*Elizabeth Garrett-Mayer, PhD*

*Vice President*

*Center for Research and Analytics (CENTRA)*

*American Society of Clinical Oncology (ASCO)*

*Alexandria, VA*

**ASCO**<sup>®</sup>

AMERICAN SOCIETY OF CLINICAL ONCOLOGY

# Disclosures for Elizabeth Garrett-Mayer

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- I am a full-time employee of the American Society of Clinical Oncology, a non-profit organization
  
- I have no financial interests to disclose

# Revisiting Dose Finding Objectives

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- Maximum tolerated dose is not optimal in modern oncology drug development
- Trials should be designed to target an 'optimal dose' characterized by both **SAFETY AND EFFICACY**
- Some proposals for change:
  - *Phase I and II should be merged using a coherent approach for optimal dosing*  
Co-primary endpoints: **SAFETY** and **EFFICACY**
  - *Phase I identifies a set of **SAFE** doses to be assessed for **EFFICACY** in phase II.*

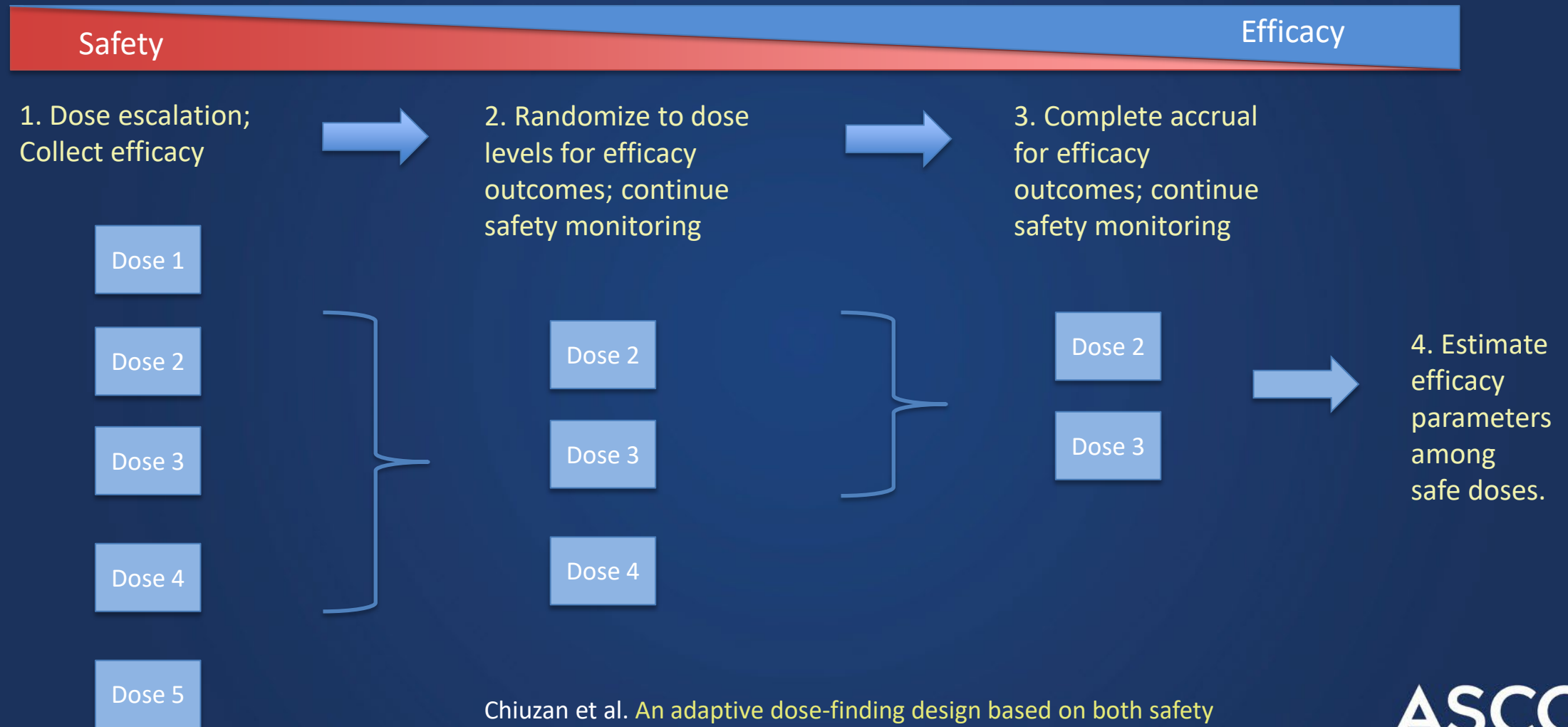


# There are a many integrated safety and efficacy based designs

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- Short list of simultaneous or semi-sequential model-based approaches to address both toxicity AND efficacy
  - Thall and Cook, **Dose-Finding Based on efficacy-toxicity trade-offs**. Biometrics (2004)
  - Wages et al. **Tailoring early-phase clinical trial design to address multiple research objectives**. Cancer Immunology, Immunotherapy (2020)
  - Chiuzan et al. **An adaptive dose-finding design based on both safety and immunologic responses in cancer clinical trials**. Statistics in Biopharmaceutical Research (2018).
  - Jin and Yin. **CFO: Calibration-free odds design for phase I/II clinical trial**. Statistical Methods in Medical Research (2022).
  - Zhou et al. **TITE-BOIN12: A Bayesian phase I/II trial design to find the optimal biological dose with late-onset toxicity and efficacy**. Statistics in Medicine (2022).
  - .....
- Unfortunately, these are infrequently employed

# Integrated dose finding design example



Chiuzan et al. An adaptive dose-finding design based on both safety and immunologic responses in cancer clinical trials. *Statistics in Biopharmaceutical Research* (2018).

# Integrated toxicity and efficacy designs

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- Many designs exist that integrate outcomes for dose finding.
- But uptake has been poor.
- Why?
  - Newer designs take longer to develop, require specialized expertise
  - Newer designs require more patients to get a “phase I” answer
  - Simple designs are simple!



# Sequential dose finding approach

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## Part 1: Toxicity-based dose finding

→ Identify a **set of doses** with acceptable toxicity

Similar to  
traditional phase 1



## Part 2: Dose selection study

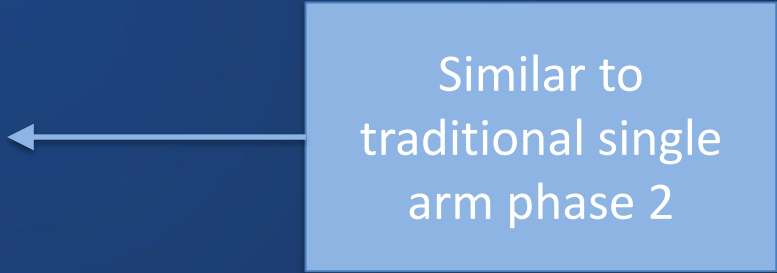
→ Assess efficacy and toxicity in small number of doses (usually 2 or 3)

→ Randomized design

→ Might be adaptive?

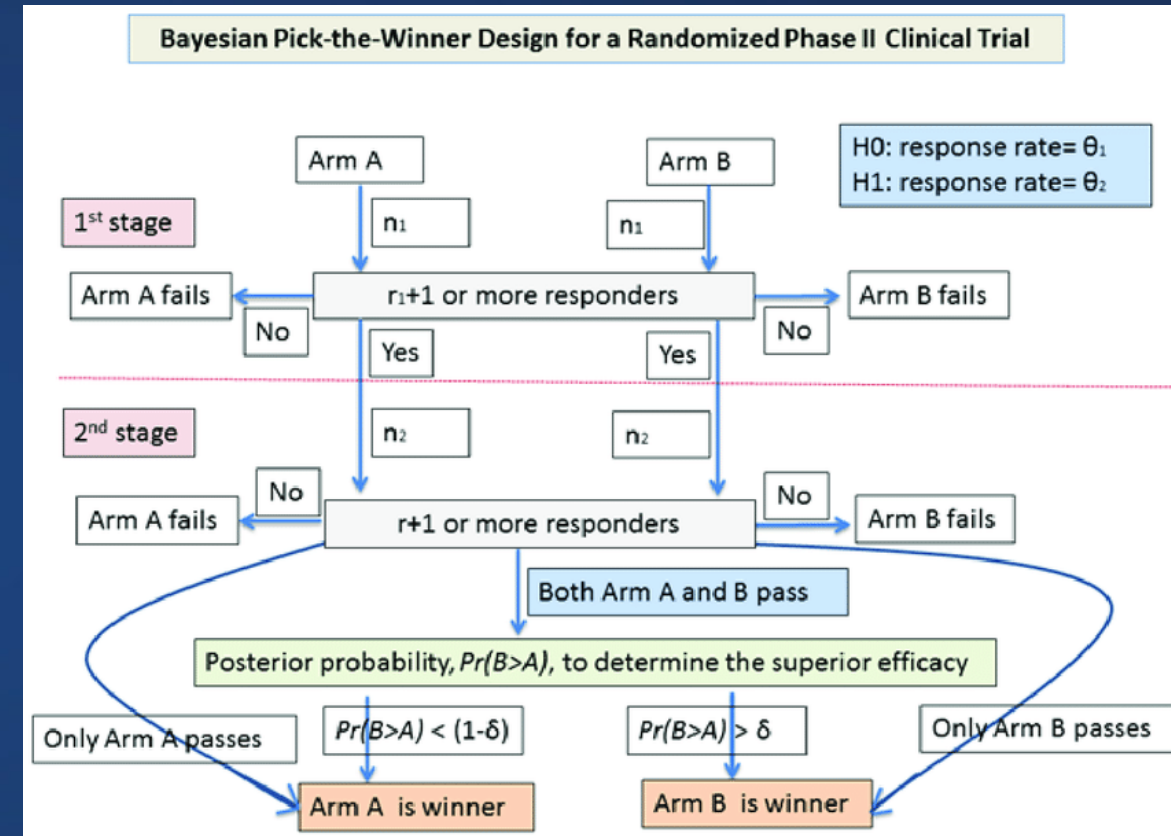
→ Select dose level with better performance

Similar to  
traditional single  
arm phase 2



# Characteristics of dose selection studies

- **Objective:** Identify **optimal** dose of treatment from a set of doses
- Relatively small sample sizes per dose arm – not designed for a direct comparison.
  - Compare each arm with a historical rate of success
  - Select N to achieve a level of precision of parameter estimate
- **“Pick the winner” designs**  
Simon et al (1985): only 29-37 patients per arm will yield 90% power to detect a regimen that has response rate superior by 15%, in a two-arm study
- **Designs motivated by precision of estimates**
  - Select N to provide level of precision (e.g., confidence interval width)
  - Select N to exclude boundary based on assumed rate
    - Similar to hypothesis testing.
- Not always a prescribed “selection rule” or “Go vs. No-Go”



Chen, Huang, et al. Oncotarget 2017.

# Targeted therapy randomized phase II selection design



722.CLINICAL ALLOGENEIC TRANSPLANTATION: ACUTE AND CHRONIC GVHD, IMMUNE RECONSTITUTION | NOVEMBER 5, 2020

**Belumosudil for Chronic Graft-Versus-Host Disease (cGVHD) after 2 or More Prior Lines of Therapy: The Rockstar Study (KD025-213)**

Corey Cutler, MD MPH, FRCPC,<sup>1</sup> Stephanie J. Lee, MDMPH,<sup>2</sup> Sally Arai, MD MS,<sup>3</sup> Marcello Rotta, MD,<sup>4</sup> Behyar Zoghi, MD,<sup>5</sup> Aravind Ramakrishnan, MD,<sup>6</sup> David Eiznhamer, PhD,<sup>7</sup> Olivier Schueller, PhD,<sup>8</sup> Zhongming Yang, PhD,<sup>9</sup> Laurie S. Green, MD,<sup>10</sup> Sanjay K. Aggarwal, MD,<sup>8</sup> Bruce R. Blazar, MD,<sup>11</sup> Steven Z. Pavletic, MD MS,<sup>12</sup> Madan Jagasia, MBBS, MS, MMHC<sup>13</sup>

*Belumosudil\* may effectively treat patients with chronic graft-versus-host disease (cGVHD), a major cause of morbidity and late non-relapse mortality after an allogeneic hematopoietic cell transplant*


Belumosudil arms:

Arm 1:  
200 mg  
daily

Arm 2  
200 mg  
twice daily

\*Belumosudil mechanism of action: oral kinase inhibitor, inhibits ROCK1 and ROCK2.

# ROCKSTAR Study design

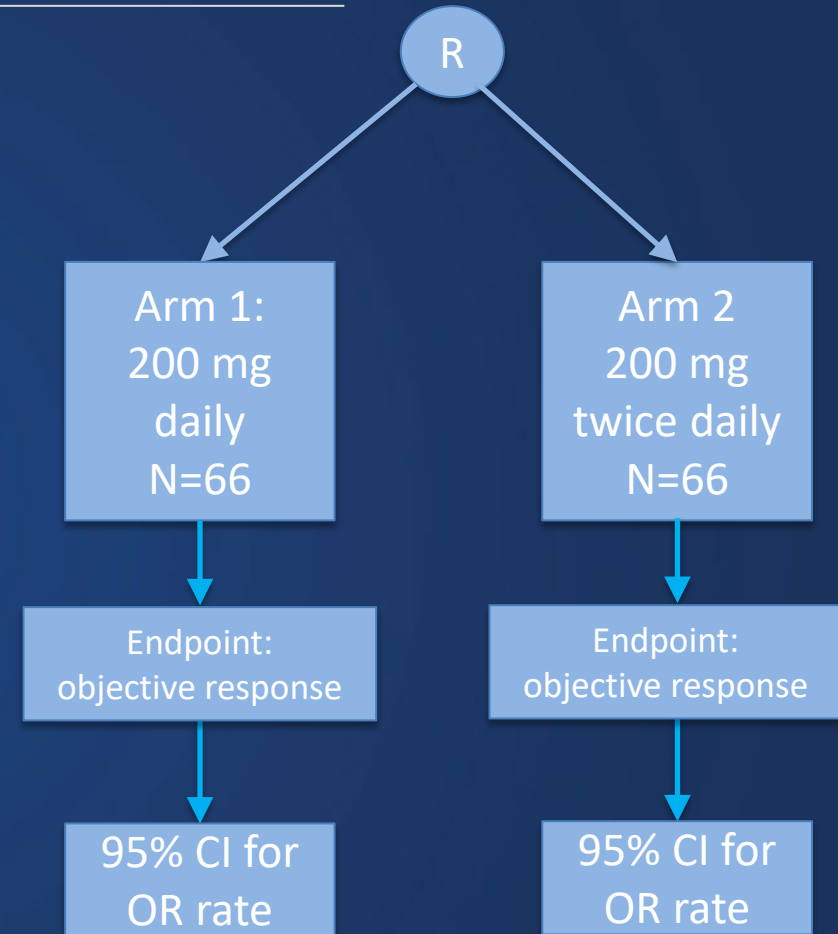


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- **Primary outcome:** objective response (OR) (partial or complete response)
- 1:1 randomization
- Expected OR rate: 55%
- **Sample size:** With 66 patients in an arm, each arm has 90% power to exclude 30% OR rate as lower bound
- Other endpoints also included to assess tolerability



# ROCKSTAR Results



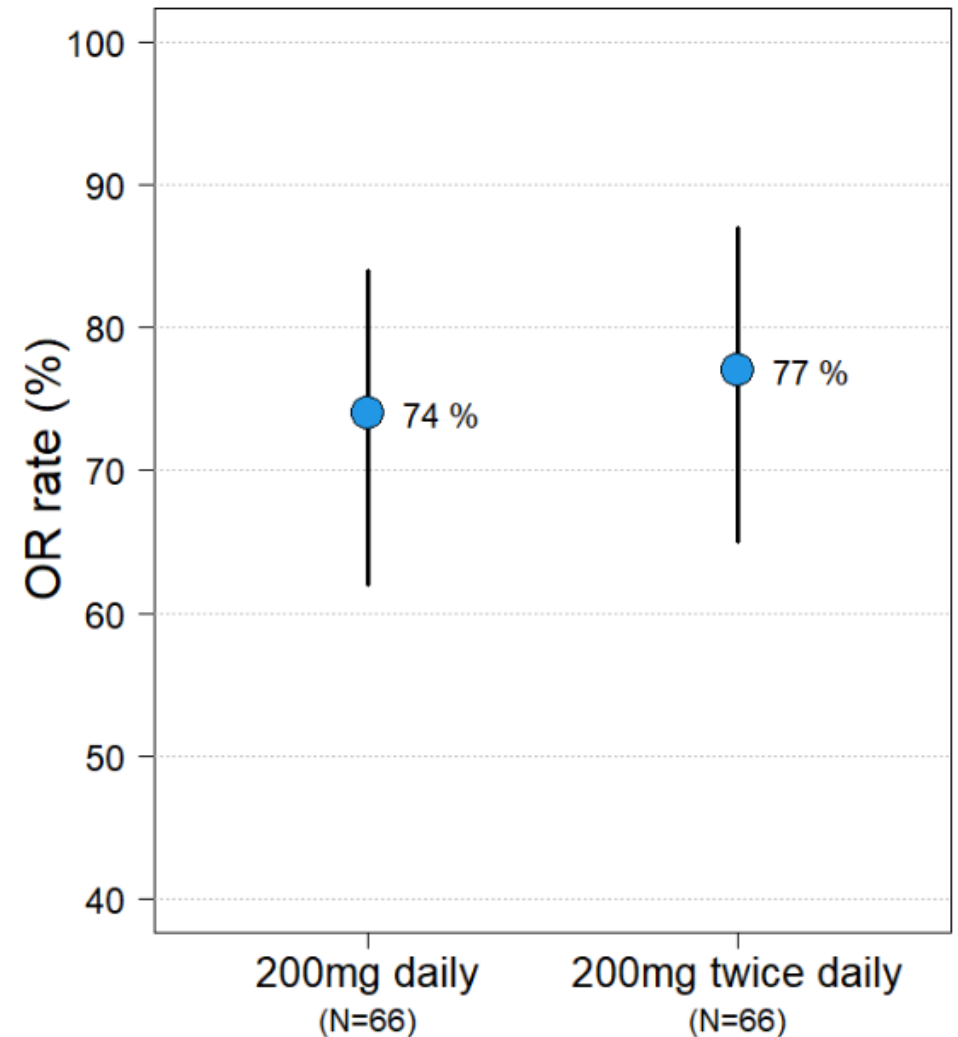
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- Both arms demonstrated sufficient efficacy.
- Slightly higher response rate in the twice daily arm
- Adverse event rates were similar across arms
- “Based on the similar efficacy and safety observed in this study, **200 mg daily is the preferred dosage for the treatment of SR cGVHD**. Although the 200-mg twice-daily dose showed higher responses in certain organs, such as the skin, and slightly fewer AEs, the difference compared with the 200-mg daily dose was not deemed significant.”

Objective response rate with 95% CI



# Immunotherapy randomized phase II selection design

## Ipilimumab monotherapy in patients with pretreated advanced melanoma: a randomised, double-blind, multicentre, phase 2, dose-ranging study

Jedd D Wolchok, Bart Neyns, Gerald Linette, Sylvie Negrier, Jose Lutzky, Luc Thomas, William Waterfield, Dirk Schadendorf, Michael Smylie, Troy Guthrie Jr, Jean-Jacques Grob, Jason Chesney, Kevin Chin, Kun Chen, Axel Hoos, Steven J O'Day, Celeste Lebbé

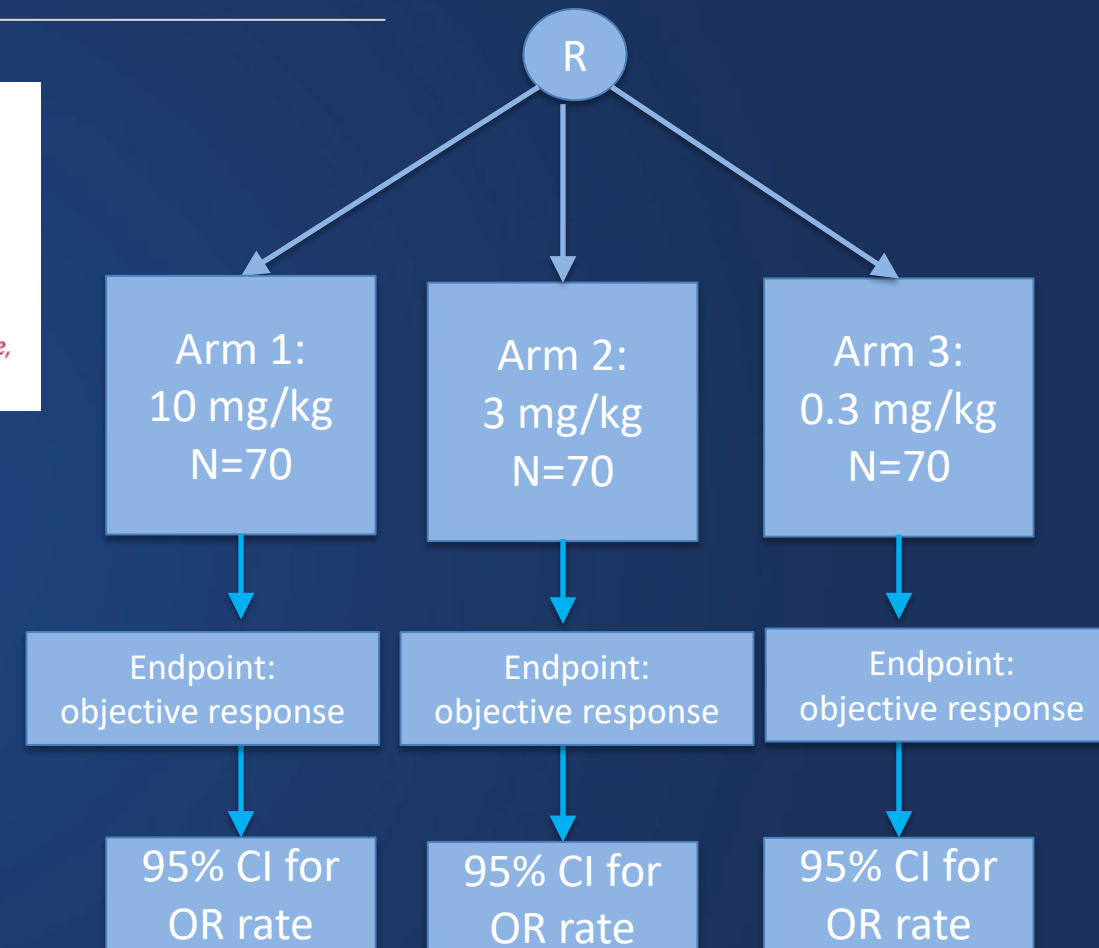
Lancet Oncology. 2010, 11: 155- 64

**Design:** Patients with previously treated stage III (unresectable) or stage IV melanoma; fixed injection dose of ipilimumab every 3 weeks for four cycles followed by maintenance therapy every 3 months

**Sample size:** Target N = 210 (~ 70 per group)

**Primary endpoint:** Objective response (partial or complete response)

Ipilimumab mechanism of action: Monoclonal antibody that binds to CTLA-4, augments T –cell activation and proliferation.



# Ipilimumab Efficacy Results

## Ipilimumab monotherapy in patients with pretreated advanced melanoma: a randomised, double-blind, multicentre, phase 2, dose-ranging study

Jedd D Wolchok, Bart Neyns, Gerald Linette, Sylvie Negrier, Jose Lutzky, Luc Thomas, William Waterfield, Dirk Schadendorf, Michael Smylie, Troy Guthrie Jr, Jean-Jacques Grob, Jason Chesney, Kevin Chin, Kun Chen, Axel Hoos, Steven J O'Day, Celeste Lebbé

Lancet Oncology. 2010, 11: 155- 64

	Ipilimumab 0.3 mg/kg (n=73)	Ipilimumab 3 mg/kg (n=72)	Ipilimumab 10 mg/kg (n=72)
Best overall response			
Complete response	0	0	2
Partial response	0	3	6
Stable disease	10	16	13
Progressive disease	43	41	36
Unknown (progressive disease by clinical observation only)	20	12	15
Best overall response rate*	0% (0.0-4.9)	4.2% (0.9-11.7)	11.1% (4.9-20.7)
Disease control rate†	13.7% (6.8-23.8)	26.4% (16.7-38.1)	29.2% (19.0-41.1)

# Ipilimumab Safety Results

## Ipilimumab monotherapy in patients with pretreated advanced melanoma: a randomised, double-blind, multicentre, phase 2, dose-ranging study

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Lancet Oncology. 2010, 11: 155- 64

	Ipilimumab 0.3 mg/kg (n=72)	Ipilimumab 3 mg/kg (n=71)	Ipilimumab 10 mg/kg (n=71)
<b>Immune-related adverse events†</b>			
Any grade	19	46	50
Grade 3-4	0	5	18

# Ipilimumab Randomized Design

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**Ipilimumab monotherapy in patients with pretreated advanced melanoma: a randomised, double-blind, multicentre, phase 2, dose-ranging study**

Jedd D Wolchok, Bart Neyns, Gerald Linette, Sylvie Negrier, Jose Lutzky, Luc Thomas, William Waterfield, Dirk Schadendorf, Michael Smylie, Troy Guthrie Jr, Jean-Jacques Grob, Jason Chesnev, Kevin Chin, Kun Chen, Axel Hoos, Steven J O'Day, Celeste Lebbé

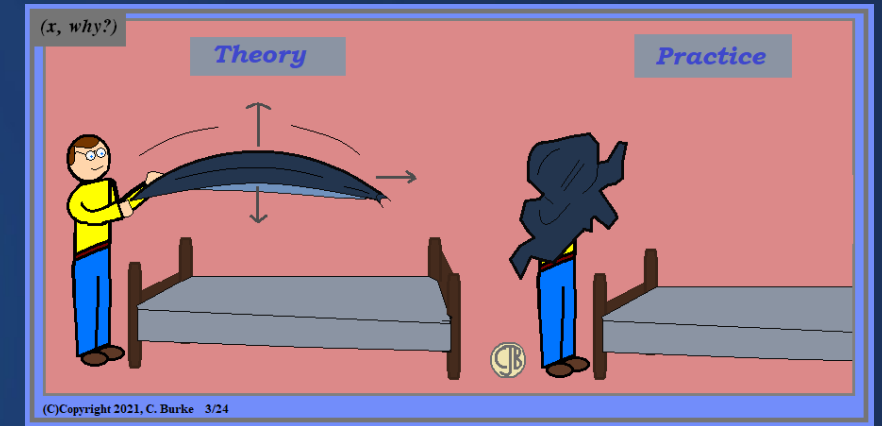
## Statistical justification of sample size:

“We calculated that 70 patients should be randomly allocated to every treatment group, whereby the maximum width of the exact 95% CI for best overall response rate at 10 mg/kg, 3 mg/kg, and 0.3 mg/kg would be about 18%, 15%, and 12% if the true best overall response rate lay in the anticipated 10–15%, 6–9%, and 2–5% ranges, respectively. *We did not select the sample size to achieve a prespecified power for a particular statistical test.*”

# Confidence in correct dose?

---

- **Statistically:** How large is large enough?
  - What is an appropriate level of precision?
  - Can be motivated by power calculation
- **Practically:** What defines correct dose?
  - Consider agent type
    - Examples are targeted therapy and IO drugs in cancer
  - Efficacy vs. toxicity trade-off
  - Patient tolerability – not always grade 3+ adverse events
    - Persistent grade 2 toxicities are not acceptable!
  - Rules for dose selection may be imprecise due to competing priorities for patient benefit
  - Important to include 2ndary endpoints to understand trade-offs



# Key points for design consideration

---

- Dose selection designs provide more realistic assessment of toxicity than traditional phase I designs
  - Traditional MTD based dose finding focuses on cycle 1
  - Dose selection design allows longer exposure to assess AEs in later cycles
- Patient populations (i.e., eligibility) often differ in traditional phase I and phase II studies.
  - Impacts choice of integrated vs. sequential design approach
- Patient heterogeneity
  - Randomized designs allow stratification to account for some prognostic factors
  - Larger sample sizes provide evidence vs. more anecdotal information from dose finding cohorts with 3 patients



# Summary: Incorporating randomization in oncology dose finding studies

---

- In the era of targeted and immunotherapies, traditional toxicity-based dose finding misses the mark
- Lower grade toxicity (grade 2) are often unacceptable, depending on type and number of cycles of treatment
- Collaboration between research team members is critical.
- **Thoughtful dose optimization yields better patient outcomes!**



# **Project Optimus**

## **Changing the Dosing Paradigm for Cancer Drugs**

Mirat Shah, MD  
Medical Oncologist, Breast and Gynecologic Malignancies  
Clinical Lead, Project Optimus  
U.S. Food and Drug Administration



# Disclosures for Mirat Shah, MD

- I have no financial interests to disclose
- I will not discuss off-label use of unapproved agents
- These slides represent current thinking in a rapidly evolving field of regulatory science

# Oncology Center of Excellence

## Project Optimus

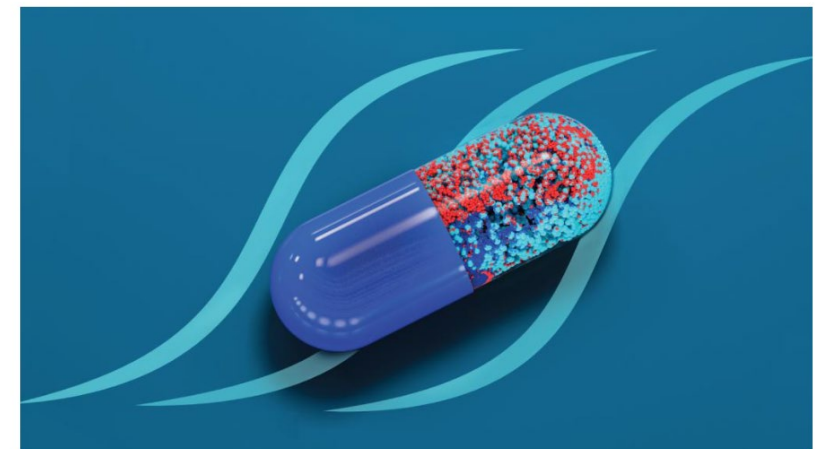


**Mission:** To reform the dosing paradigm in oncology drug development

**Main Message:** Dosage optimization is essential to safe and effective cancer therapies

**Who We Are:** A multidisciplinary team of medical oncologists, clinical pharmacologists, biostatisticians, toxicologists, and other scientists with expertise in key facets of dosage optimization

**More Info:** [Project Optimus website](#)



# Right Time for Dosage Optimization = Prior to Approval

- Improves decision-making for the drug development program
- Prevents avoidable toxicity → increases uptake and improves adherence
- More efficient, more feasible
- Allows for more rapid development of new indications and combination therapies

**“Dose is the foundation of drug development. Having the wrong dose is like building a house on quicksand.”**

- Rick Pazdur

# Guidance Documents

Guideline for Industry

Dose-Response Information  
to Support Drug  
Registration

**ICH-E4**

November 1994

1994

**Guidance for Industry**

Exposure-Response Relationships — Study  
Design, Data Analysis, and Regulatory  
Applications

U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Center for Biologics Evaluation and Research (CBER)  
April 2003  
CP

2003

**Optimizing the Dosage  
of Human Prescription  
Drugs and Biological  
Products for the  
Treatment of Oncologic  
Diseases**

**Guidance for Industry**  
*DRAFT GUIDANCE*

This guidance document is being distributed for comment purposes only.

U.S. Department of Health and Human Services  
Food and Drug Administration  
Oncology Center of Excellence (OCE)  
Center for Drug Evaluation and Research (CDER)  
Center for Biologics Evaluation and Research (CBER)  
January 2023  
Clinical/Medical

2023

# Oncology Dosage Optimization Draft Guidance

## Optimizing the Dosage of Human Prescription Drugs and Biological Products for the Treatment of Oncologic Diseases

### Guidance for Industry

*DRAFT GUIDANCE*

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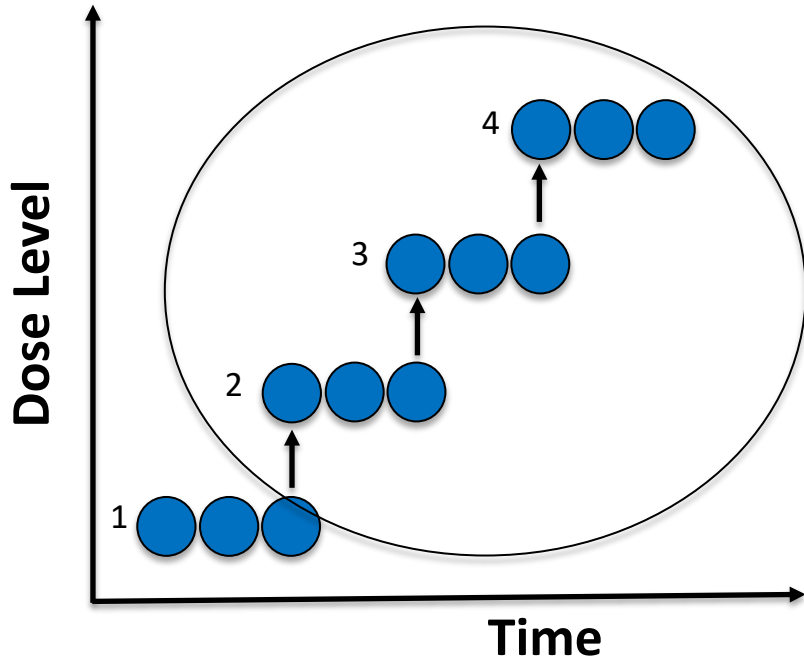
- Dosages must have justification appropriate to the stage of development
- Use the totality of data for dosage selection
  - Including dose- and exposure- response relationships for efficacy and safety
- Randomized comparisons support identification of optimized dosage(s) → more on next slides
- Safety assessments should include low-grade symptomatic toxicities which affect tolerability
- Meet with FDA early to discuss plans

2023

# Updated Dosage Selection Strategy

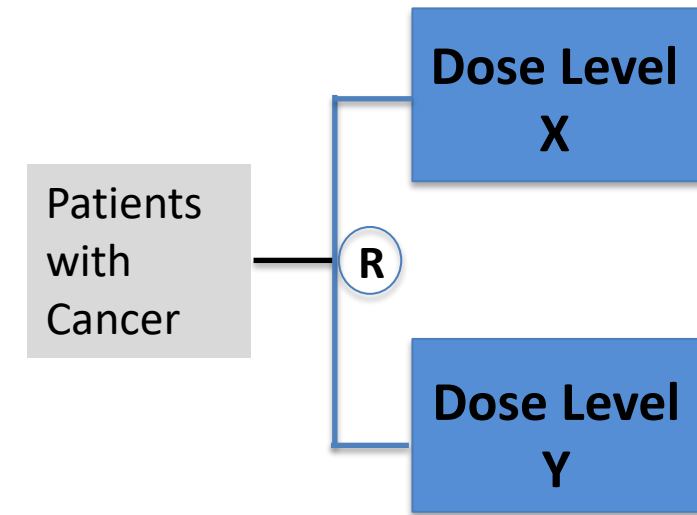


## Dose Escalation



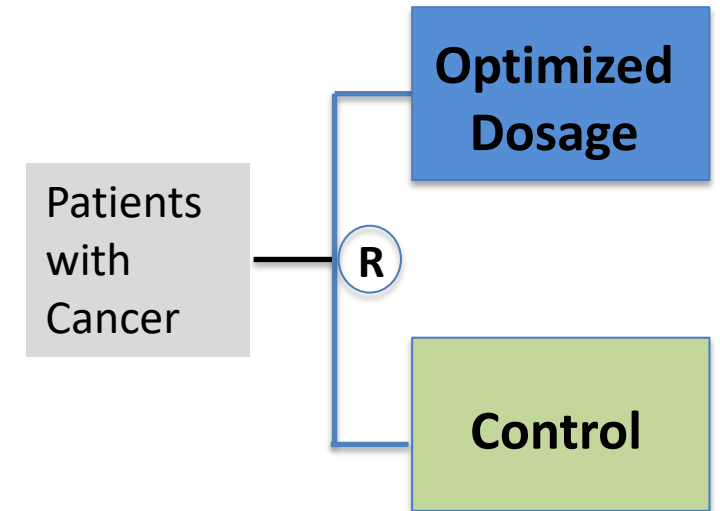
Select Several  
Dosages

## Dosage Optimization



Further Evaluate  
Dosages

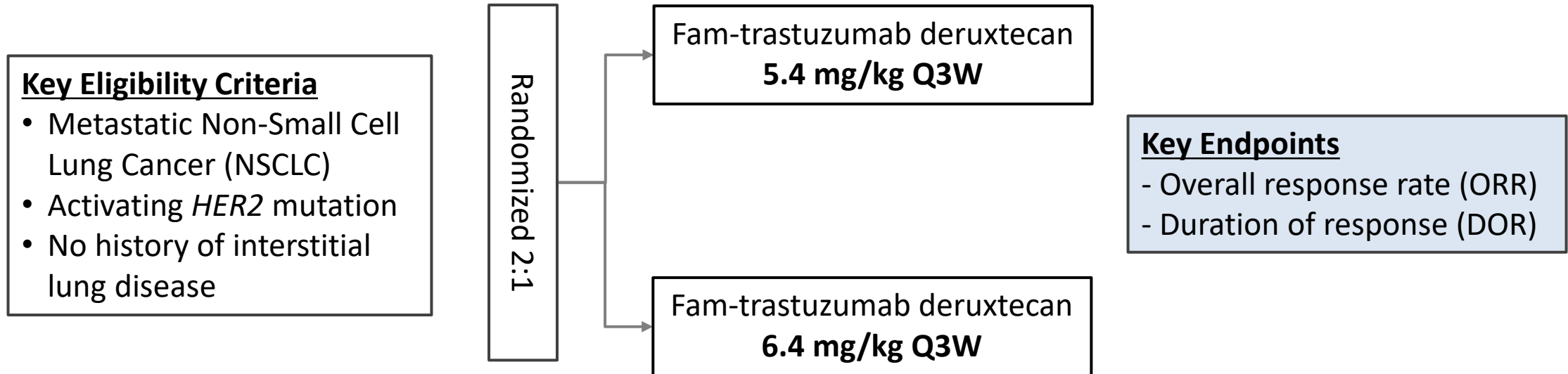
## Registration



Compare to  
Standard of Care

# Example: Fam-Trastuzumab Deruxtecan

## DESTINY-Lung02



# DESTINY-Lung02: Efficacy and Safety



Efficacy	5.4 mg/kg* (N=52)	6.4 mg/kg** (N=28)
<b>Overall Response Rate</b> % (95% CI)	<b>58</b> (43, 71)	<b>43</b> (25, 63)
<b>Duration of Response</b> (months), median (95% CI)	8.7 (7.1, NE)	5.9 (2.8, NE)

Toxicity	5.4 mg/kg* (N=101) %	6.4 mg/kg** (N=50) %
<b>ILD/Pneumonitis</b>	6	14
<b>Drug Discontinuation</b>	8	16

\*From USPI drugs@FDA

\*\*From ESMO 2022

# Conclusions

- Traditional oncology dosage selection strategies need to be updated
- Failure to optimize the dosage has lasting consequences to patients and overall drug development
- It is important to consider the totality of data at each step in dosage selection
- Randomized trials support selection of a dosage optimized for benefit-risk
- One size doesn't fit all oncology product development programs

# Acknowledgements

- Laleh Amiri-Kordestani
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- Joyce Cheng
- Stacy Shord
- Atik Rahman
- Marc Theoret
- Richard Pazdur
- All members of the Project Optimus team

# Dosage Optimization Resources

## Multi-Stakeholder Meetings

- [Friends of Cancer Research Annual Meeting 2021](#)
- [Friends of Cancer Research White Paper 2021](#)
- [FDA- ASCO Workshop: “Getting the Dose Right”](#)

## Publications

- [The Drug-Dosing Conundrum in Oncology- When Less is More](#)
- [How to Get the Dose Right](#)
- [Improving Dose-Optimization Processes Used in Oncology Drug Development to Minimize Toxicity and Maximize Benefit to Patients](#)

## Guidance Documents

- [ICH E4: Dose-Response Information to Support Drug Registration](#)
- [Exposure- Response Relationships](#)
- [Optimizing the Dosage for Treatment of Oncologic Diseases](#)