

Stem cell transplantation in children

Çok Merkezli Çalışma Düzenlenme

How to design a new study?

TPHD

Kemik Iliği Yetersizliği Sempozyumu

Samsun, 25.04.08

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Ulm, Germany

ORBIS TERRARUM TYPUS DE INTEGRO IN PLURIMIS EMENDATUS AUCTUS ET ICUNCULIS ILLUSTRATUS



1757

Scurvy...

Vitamine C Deficiency:

- *Gingival bleeding*
- *Infections*
- *Wound Healing*
- *Skin Infections & Bleeding*
- *Muscular Atrophy*
- *High Fever*
- *Severe Diarrhea*
- *Depression*



*12 patients with scurvy of similar severity
on the same ship (HMS Salisbury) with the same diet*

2 Patients each

*25 drops of
Elixir Vitriol TTD*

*250ml
Cyder*

*250ml
Sea Water*

30ml Vinegar TTD

*2 Oranges
1 Lemon*

*Spice paste
, Beer'*

James Lind

1716 - 1794

place, being a proper apartment for the sick
in the fore-hold; and had one diet com
to all, viz. water-gruel sweetened with
in the morning; fresh mutton-broth
times for dinner; at other times light
dings, boiled biscuit with sugar, &c. at
supper, barley and raisins, rice and cu
fago and wine, or the like. Two of these
were ordered each a quart of cyder a-day.
Two of the patients took two
drinks of vinegar three times a-day, upon
an empty stomach; having their gruels and
their other food well acidulated with it, as
Two of the patients in the ham
(it had) were
Of this they
drink half a pint every day, and sometimes
more or less, as it operated, by way of gen
tle physic. Two others had each two oranges
and one lemon given them every day. These
they eat with greediness, at different times,
upon an empty stomach. They continued
L 3 but



Evidence

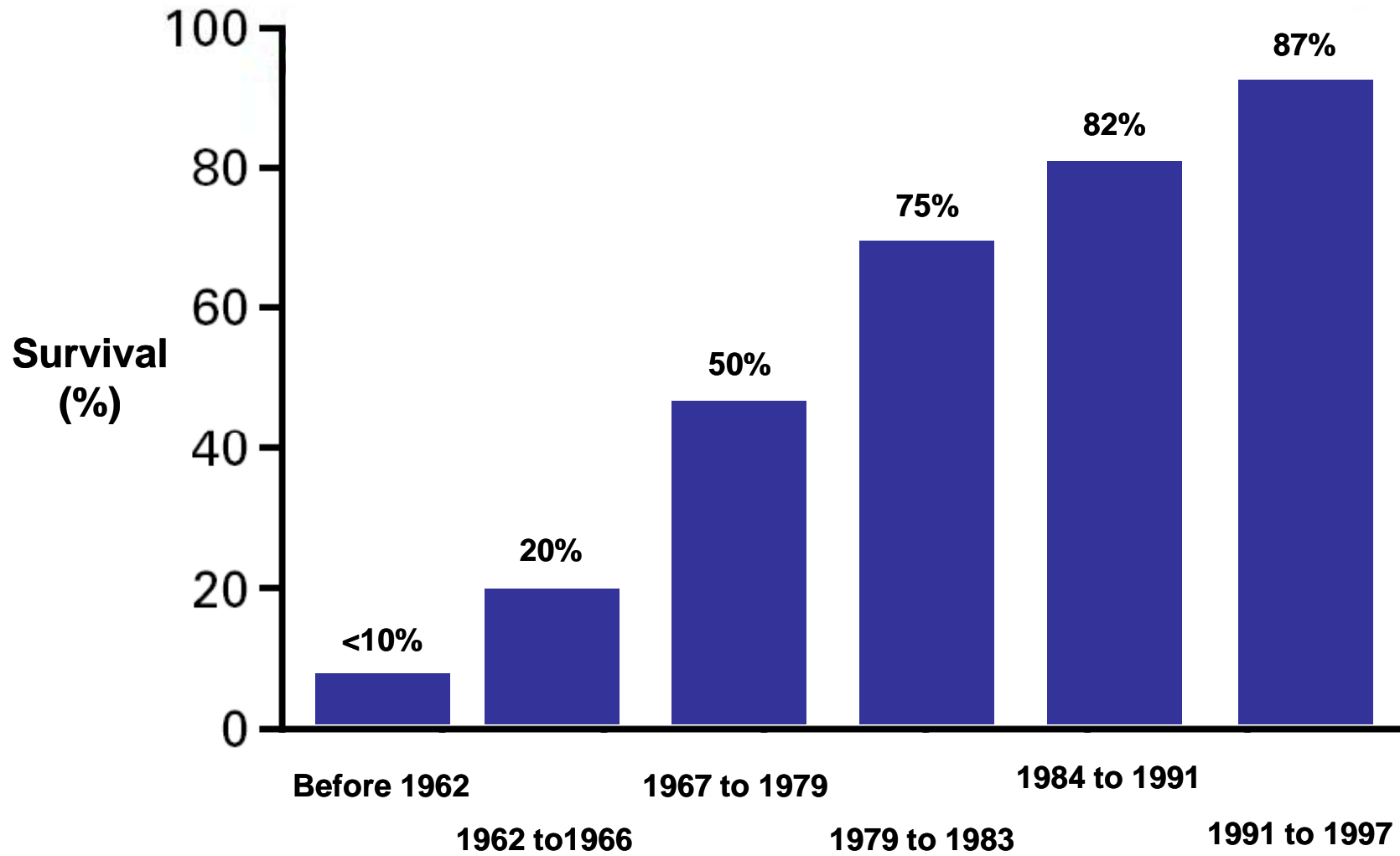
or the rational basis for clinical
trials...

Levels of Evidence

- 1a** Systematic reviews of randomized controlled trials
- 1b** Individual randomized controlled trials
- 1c** All or none randomized controlled trials
- 2a** Systematic reviews of cohort studies
- 2b** Individual cohort study or low quality randomized controlled trials
- 2c** 'Outcomes' Research; ecological studies
- 3a** Systematic review of case-control studies
- 3b** Individual case-control study
- 4** Case-series (and poor quality cohort and case-control studies)
- 5** Expert opinion without explicit critical appraisal, or based on physiology, bench research or 'first principles'

**Do we need clinical studies
in pediatric SCT?**

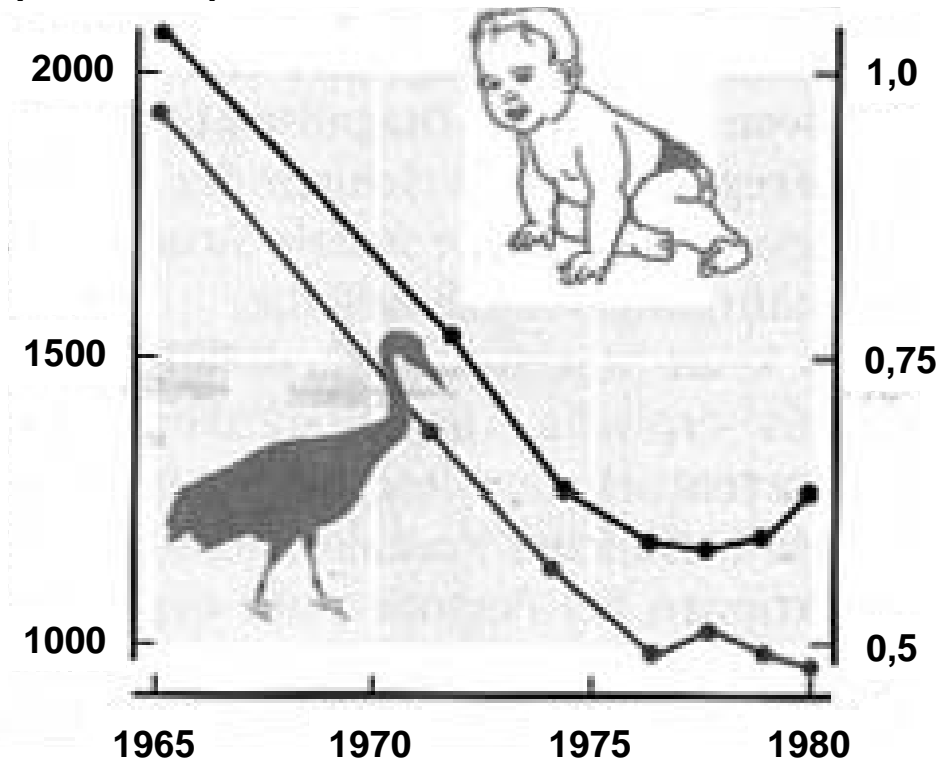
Survival rates of children with acute lymphatic leukemia from 1960 until today



But not every study is a good study...

Breeding Storchs (Kelebek)

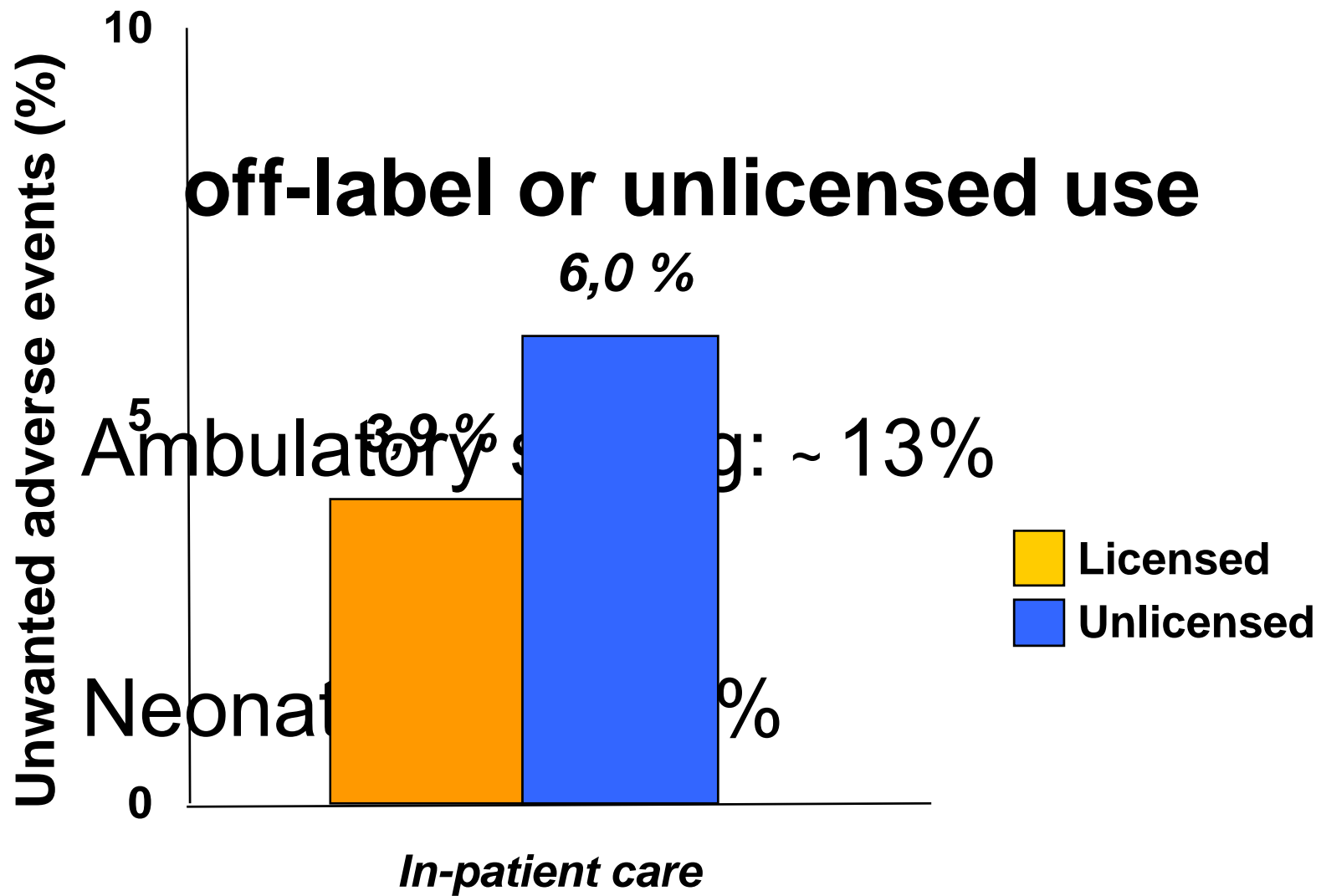
Million Newborns



Korrelation between the decline of breeding storchs and the reduction in birth rate in Germany between 1965 - 1980

The Conroy Study, 1998

- paediatric units of five hospitals in European countries
- 2262 prescriptions for 624 minors
- 46% of the prescriptions were "off label" or "off license"
- 67% of the minor patients were treated without proper evidence of dosage, tolerability and efficacy



**Why are there so few
licensed drugs,
pharmaceutical or
clinical trials in
children?**

The ethical dilemma with research in children



The Belmont Principles

Ethical Principles and Guidelines for the Protection of Human in Research

Published in 1979 by the National Commission for the Protection of Human Subjects of Biomedical and Behavioral Research.

They provide the philosophical underpinnings for current federal laws that govern research involving human subjects.

1. Beneficence

1. do not harm
2. maximize possible benefits
3. minimize possible harms

2. Justice

- Researchers must be careful not to select already burdened or vulnerable groups who might be more easily coerced to participate.

3. Respect for persons

- Researchers must recognize that individual's judgments and choices about participating in the research must be respected.
- For those not capable of deciding for themselves ... are vulnerable subjects (e.g., children,...)

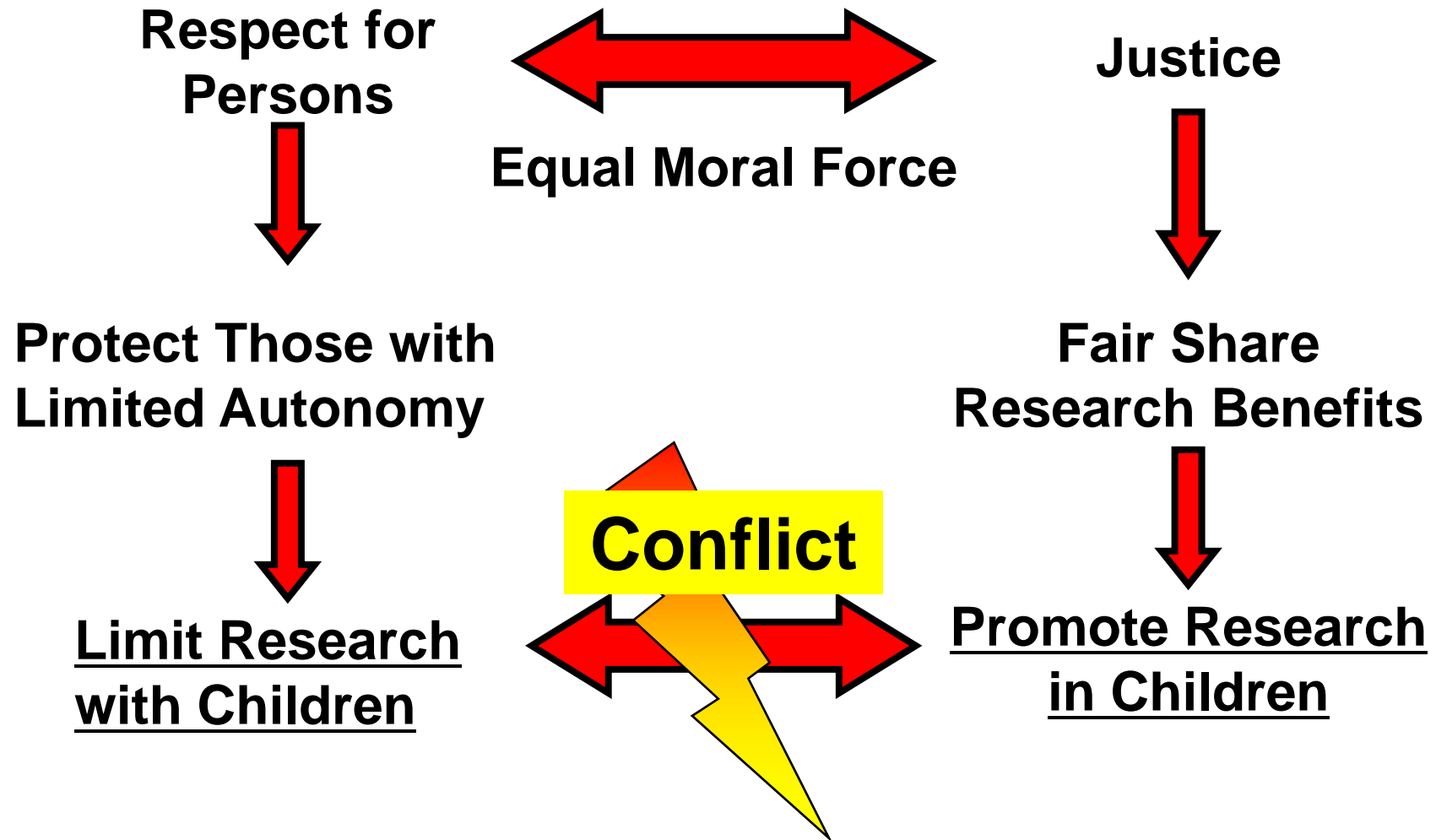


Subjects or their legal representative must sign an informed consent form detailing the research to be done, the potential risks and benefits, and anything else that might influence their decision to participate.

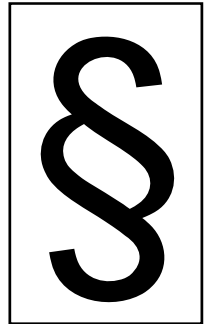
Consent in pediatric research

- Parents cannot give true "consent" – legally only an autonomous person can do that for themselves. But parents can and should be respected in their role as responsible for the child's welfare (Parental permission required)
- Children cannot give true "consent" – they may not have the legal or cognitive ability to make this decision. But this does not mean they should have no say regarding participation (Child assent required)

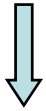
Conflict in Belmont Principles?



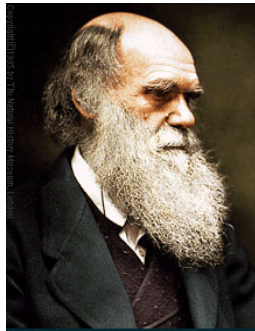
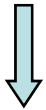
Levels of control to protect the patient



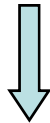
National laws, 'Declaration of Helsinki',
GCP (Good Clinical Practice)



Sponsor



Principal
Investigator



Ethics, IRB, Authorities



Physician
Patient



**What is the position of
the pharmaceutical industry?**

Most Common Causes of Death

- Ages 1-14

1. *Accidents*
2. **Cancer**
3. *Birth Defects*
4. *Infections*

Ages 15-34

- *Males*

1. *Accidents*
2. *Homicide*
3. *Suicide*
4. **Cancer**

- *Females*

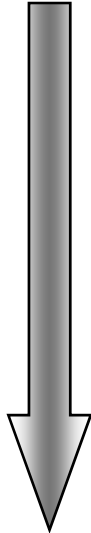
1. *Accidents*
2. **Cancer**
3. *Homicide*
4. *Suicide*

Cancer Occurrence in Children

- **1/300** children will be diagnosed with cancer by 20 yo
- **12,000-13,000** new cases of cancer in children less than age 20 in the U.S. each year
 - vs. **1,368,030** total adults in U.S. 2004
 - vs. **215,990** breast cancer in U.S. in 2004
 - vs. **15,190** breast cancer in NY in 2004

Jemal et. Al. Cancer Statistics, 2004. CA Cancer J Clin 2004; 54;8-29.

Drug Development and Approval Process in the 1990s

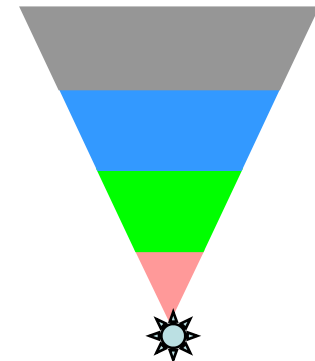
	Preclinical Testing		Clinical Trials			Post Clinical Trials		Total Years for Approval
	Step 1	Step 2	Step 3	Step 4	Step 5	Step 6	Step 7	
	Lab / Preclinical	File IND application	Phase 1	Phase 2	Phase 3	File NDA	FDA Appro.	
PURPOSE	Safety and bio activity in the lab and animal models	FDA approval to begin clinical testing in humans	What dosage is safe, how Rx should be given	Effect and side effects	Is the Rx better than current standard	Inform the FDA of Phase 3 data	Review process	
TIME (average number of years)								
ALL ANTI-CANCER DRUGS	4.4		8.6				1.4	14.4
ALL DRUGS*	3.8		10.4				1.5	15.7

DiMasi, J.A. (2001). New drug development in the United States 1963-1999. *Clinical Pharmacology and Therapeutics* May; 69(5); Tufts Center for the Study of Drugs Development, Tufts University; adapted from Pharmaceutical Research and Manufacturers of America.

Rare success

- 5/5000 compounds that enter preclinical testing make it to human testing
- 1/5 of drugs that enter clinical trials are approved

***Total 1/5000 new compounds
are approved***



Pharmaceutical Research and Manufacturers of America (PhRMA),
Pharmaceutical Industry Profile 2004, Washington DC, PhRMA, 2004

Average Research & Development Cost to Bring One Drug to Market

\$802 Million !

[Six-fold increase between 1975-2000!!!]

DiMasi JA, Hansen RW, Grabowski HG. "The Price of Innovation:
New Estimates of Drug Development Costs," *Journal of Health
Economics*, 22, 151-185 (2003)

FDA Approval of Cancer Therapies

1948-January 2003

- 120 cancer therapies
- 30 are useful for children
- 15 labeled for pediatric use
 - Often with limited information
- Since 1980, 2 drugs labeled for use in pediatrics (vs. >50 drugs for adults):
 - Teniposide (BMS) – 1980 refractory ALL
 - Clofarabine (Ilex/Genzyme) –2004 refractory ALL

Patient Access to New Therapeutic Agents for Pediatric Cancer: Report to Congress.
December 2003. Dept. of Health and Human Services U.S. FDA.

Fifteen Oncology Drugs Approved for Pediatric Use With Pediatric Dosing Information in the Label

L-Asparaginase	Leukemias
Cyclophosphamide	Leukemias, lymphomas, neuroblastoma, retinoblastoma
Cytarabine	Acute nonlymphocytic leukemia in adults and children
Dactinomycin	Wilm's tumor, rhabdomyosarcoma, choriocarcinoma, testicular carcinoma, Ewing's sarcoma, sarcoma botyroides
Daunorubicin	Acute lymphocytic leukemia in adults and children
Doxorubicin	Wilm's tumor, neuroblastoma, soft tissue sarcomas, Hodgkin's disease, other malignant lymphomas, acute lymphocytic leukemia, acute myelogenous leukemia
Lomustine	Brain tumors, Hodgkin's lymphoma
Mercaptopurine	Acute lymphocytic leukemia in adults and children
Methotrexate	Acute lymphocytic leukemia, meningeal leukemia, osteosarcoma, NH lymphomas
Procarbazine	Hodgkin's lymphoma
Thioguanine	Acute Non-lymphocytic leukemia
Teniposide	Refractory childhood acute lymphocytic leukemia
Tretinoin	Acute promyelocytic leukemia
Vinblastine	Histiocytoses, testicular germ cell carcinomas, Hodgkin's lymphoma
Vincristine	Acute leukemias, lymphomas, Wilm's tumor, rhabdomyosarcoma, neuroblastoma

Why?

1. Kids don't vote

NCI's total budget for fiscal year 2003

\$4.6 billion

Amount spent on ALL pediatric cancer

\$160 million

2. Kids are not profitable

Why put **\$810 million** to develop a drug for **425** children/year with rhabdomyosarcoma, when the same money can go into developing a drug for **215,990** adults/year with breast cancer?

(or millions of men with erectile dysfunction)

The need for evidence in pediatrics was long neglected by politicians and the pharmaceutical industry.

Harry Shirkey, 1968:

‘therapeutic orphans’

in order to highlight the extent to which children are neglected

Orphan drug

An orphan drug is any drug for the treatment of rare diseases ('orphan diseases'), defined as diseases affecting fewer than **1 in 2000** people in the community.

The reason:

Medical research and development of drugs to treat such diseases is financially disadvantageous

The benefit:

Tax reductions and marketing exclusivity (a "monopoly") on that drug for an extended time

**In 2003, the leading orphan drug
by worldwide sales revenue
was?**

Erythropoietin (Epogen®), with sales of \$2.4
billion...

It can be quite advantageous to be an orphan

The problem is recognized...

Important steps towards proper clinical studies in pediatrics



1979 Pediatric use

2000 Orphan Drug

1983 Orphan Drug Act

2000 Pediatric Council Resolution

1991 Pediatric Page

2001 Clinical Investigation
in the pediatric population

1994 Pediatric Plan

2001 EU-Directive 2001/20/EG

1997 Modernization Act

2004 EU-Decree on medicinal
products for pediatric use

2000 Final rule

2006 Draft guidance on 'specific
modalities for non-commercial
trials

2003 Pediatric Research
Equity Act

2007 Implementation of this
decree (01/26/2007)

Consequence: 691 ped. studies in 43.000 children until 2004 in the US

EU-Directive 2001/20/EG

The intention:

- simplify and streamline administration
- raise the quality of clinical trials

The implementation:

All clinical trials must be **GCP** conform

The **same standards** of conduct on non-pharmaceutical or so called '**investigator initiated**' trials (IIT) previously only required for **pharmaceutical**, mostly licensing, trials.

Good clinical practice (GCP)

*“GCP is an international ethical and scientific quality standard for **designing, conducting, recording and reporting** trials that involve the participation of human subjects. Compliance with this standard provides public assurance that the **rights, safety and well-being** of trial subjects are protected, consistent with the principles that have their origin in the **Declaration of Helsinki**, and that the clinical data are **credible....**”*

The Consequence:

- New legal responsibilities (sponsorship)
- Administration
- Data monitoring
- Safety (AE/SAE reporting)
- Auditing
- etc.....

Our Problem:

Children are an economically irrelevant minority
burdened with more risks than benefits

EU-Decree on medicinal products for pediatric use (01/26/2007)

This regulation is the most serious attempt to facilitate the development and accessibility of medicinal products for the use in children in Europe. It specifies requirements to protect children participating in clinical trials.

It is comparable to the US regulation “Pediatric Research Equity Act“ adopted in 2003 that eventually had a significant impact on clinical trials in the US over the following years.

Data quality

A high recruitment rate but poor data quality in the end will diminish the power of the study or can even invalidate it.

Stringency



Data gathering



Data Monitoring



Data monitoring

Sponsor responsibilities, Section 5.18

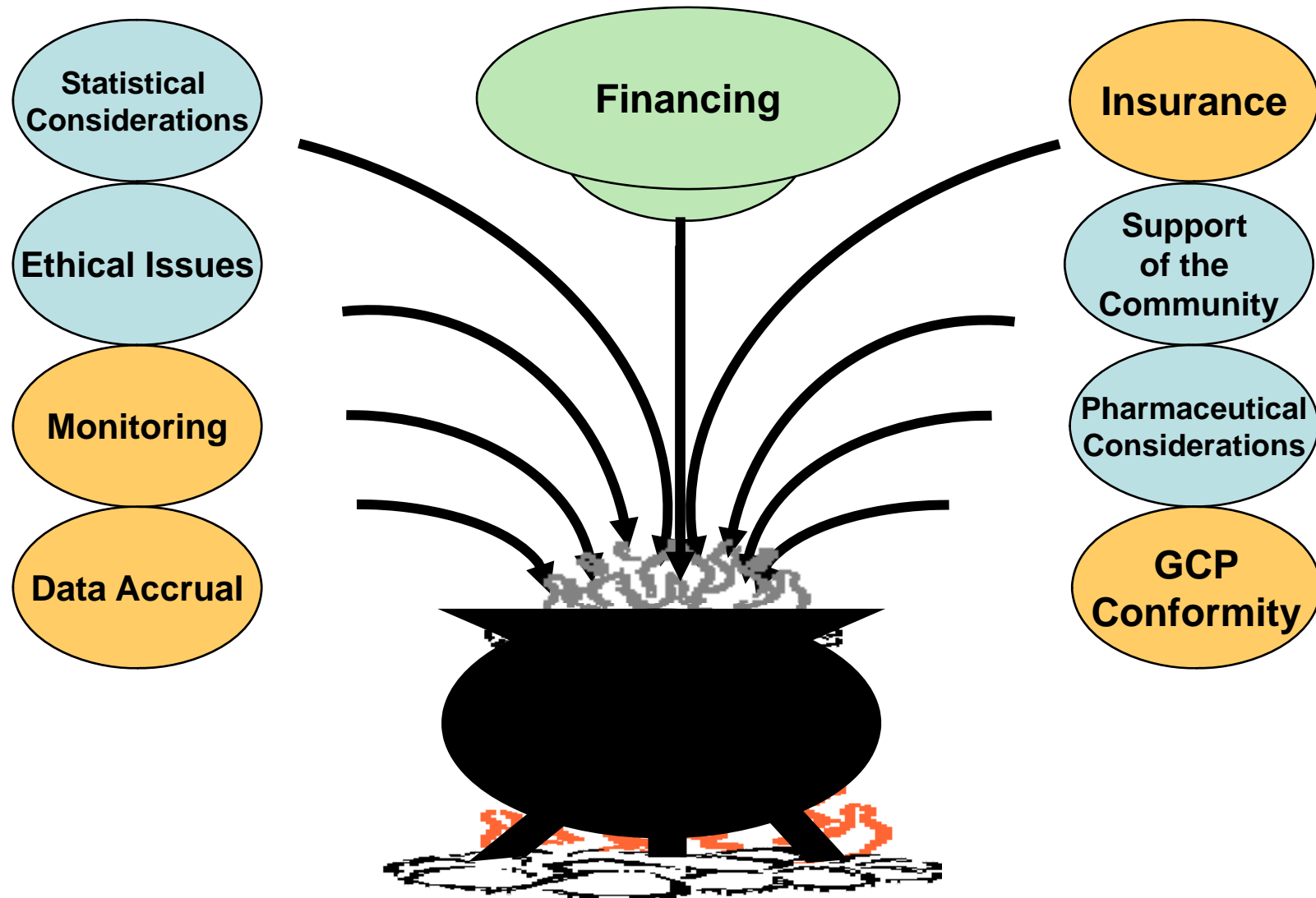
- **Communication** between the sponsor and the investigator
- Verifying qualifications and **resources** of the investigator
- Verifying that the investigator **follows** the approved protocol
- Verifying that written informed **consent** was obtained
- Ensuring that the investigator/investigator's trial staff are adequately **informed** about the trial
- Verifying that the investigator is enrolling only **eligible** subjects
- Verifying that documents and trial records are **accurate, complete, ...**
- Checking the **accuracy and completeness** of the CRF entries, ...
- Determining whether all **adverse events** (AEs) are appropriately reported
- Communicating deviations from the protocol, SOPs, GCP, and the applicable regulatory requirements to the investigator and taking appropriate action designed to prevent recurrence of the detected deviations

How to design a new study?

Basic questions

- Interest, priority?
- What kind of a clinical trial? (Phase I, II, III, IV)
- Statistical considerations? (Incidence & sample size)
- Study design? (Randomized, blinded and placebo controlled, open label, single arm, cohort or observational, etc)
- What is the time frame?
- Regulatory considerations?
- Practicability and accessibility?
- Sponsors and financial resources?

Ingredients of a GCP-conform study



What for and how much money ??

- GCP conform protocol design
- Regulatory Submissions
- Data Management
- Electronic case report forms
- Audit / Monitoring
- Insurance
- Initiation-meetings
- Investigator-meetings
- Advisory board and meetings
- DSMB boards and meetings
- IBR Board meetings
- Statistical analysis
- Drug supply / shipment cost
- Pharmacy fee
- Laboratory fee
- Per patient fee
- Research nurse
- Administrative overheads

€ 300'000 > € 1'000'000+

Issues and difficulties with pediatric studies in stem cell transplantation

- Few pediatric HSCT per centre

Consequence:

large multi-centre studies are obligatory

- **Financing** (lack interest of the pharmaceutical industry, overwhelmed grant givers)
- **Lack of 'study culture'** (according to GCP regulations)
- **'Ethical difficulties'** with pediatric studies

Our problem

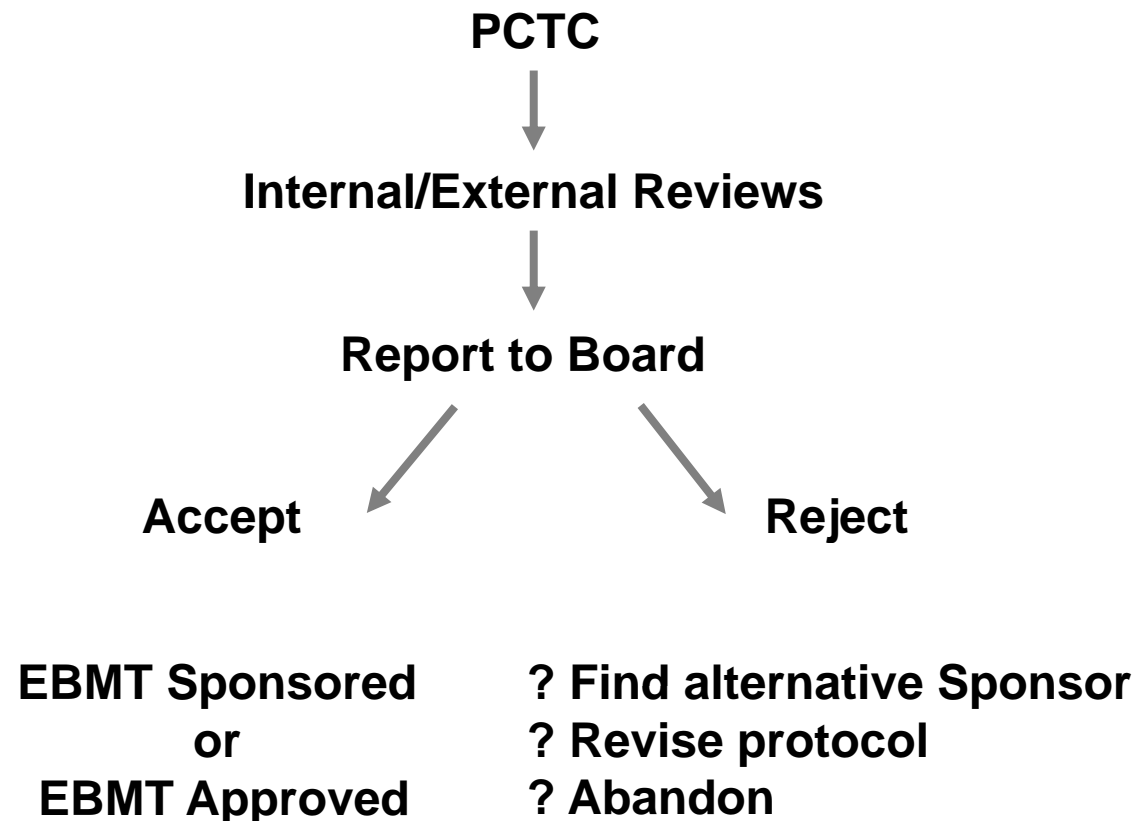
- There were **18620** stem cell transplantations in 2004 registered with the EBMT
- **2515 (13.5%) registered** patients were under 18 years
- There are currently **~20** official EBMT studies, only **one** is in children
- Scientific advancement and clinical rational is often based on mostly retrospective small sample size, observational 'studies'

Conclusion:

Pediatric studies are underrepresented within the EBMT

Prospective Clinical Trials Committee

- Support protocol development
- Oversight of review process



Roles of the Working Party

Develops protocol in accordance with scientific strategy

Study concept



Presentation to WP



Draft protocol

Rational, Objectives, Eligibility Criteria
Study Design, Statistics, Data Collection



Submission to Prospective Clinical Trials Committee

Lyon, March 2007



The aim
Increase the number of pediatric EBMT studies

Possible solution:
'Pediatric subcommittee'

**Basic know-how and 'step-by-step' guidance
for future PIs**

- **Provide basic 'equipment'**
in order to
 - **Avoid decoys and frustration**
 - **Shorten the duration between conception and launch**

Possible Proceedings

6 to 8 months

12 to 18 months

Who should be represented in this 'Subcommittee' and what are their tasks?

- EBMT/PCTC
- Statistician(s)
- Advisor for ethical issues
- Pharmacist (if needed for particular study questions)
- Board of clinicians of the 'pediatric' Working parties

Major prerequisites

- Certified GCP-conform database structure quickly available, easy and uniform
- Financing models
(Grants, industry, EBMT, Institution)
- Monitoring structure?
- Modern statistical designs



European Medicines Agency
11/2007

Adaptive study designs: “adaptive” if statistical methodology allows the modification of a design element at an interim analysis like:

- sample-size
- randomisation ratio
- number of treatment arms
- et al

“difficult experimental situations” :

- small populations
- orphan diseases with constraints to the maximum amount of evidence that can be provided
- ethical constraints to experimentation
- *et al*