

Pragmatic and Holistic Approach for Dose Finding and Optimization in Oncology Drug Development – A Clinical Pharmacology Point of View

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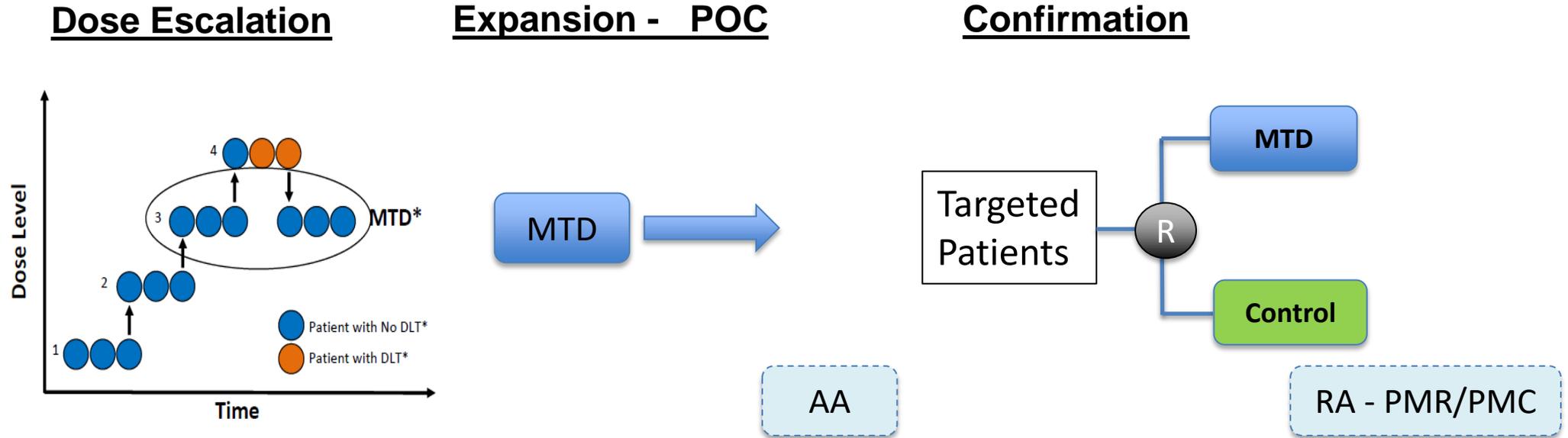
Disclaimer:

1. I have no conflict of interest to report.
2. The views presented here are my personal opinions and should not be interpreted as the position of the US FDA.

Outlines

- Current paradigm of oncology drug dose finding/optimization and the concerns
- Factors affecting dose finding/optimization
- Case studies: from lab to lifecycle
- Holistic approach with totality of evidence
- Summary

Current Oncology Dose finding/optimization paradigm



- Dose selection is mainly driven by toxicity (assuming “more is better” for efficacy)
- MTD determined with few patients and short duration
- DLTs may not reflect chronic tolerability/other safety

Consequences for Patients

Why?

Landscape shift:

- Cytotoxic agents -> MTA -> IO, BsAbs
 - Different dose-response: more is not always better
- Longer duration of therapy
 - DLT may not reflect actual (long term) toxicity/tolerability

Not efficient:

- Not using all information of **dose-exposure-response** from nonclinical, historic data, clinical data from each patient

Consequences for patients

- Experience preventable toxicity
- Impact quality-of-life
- Impact ability to remain on a drug and ability to receive future therapies
- Treatment is not optimized for an actual patient

Consequences for Drug Development

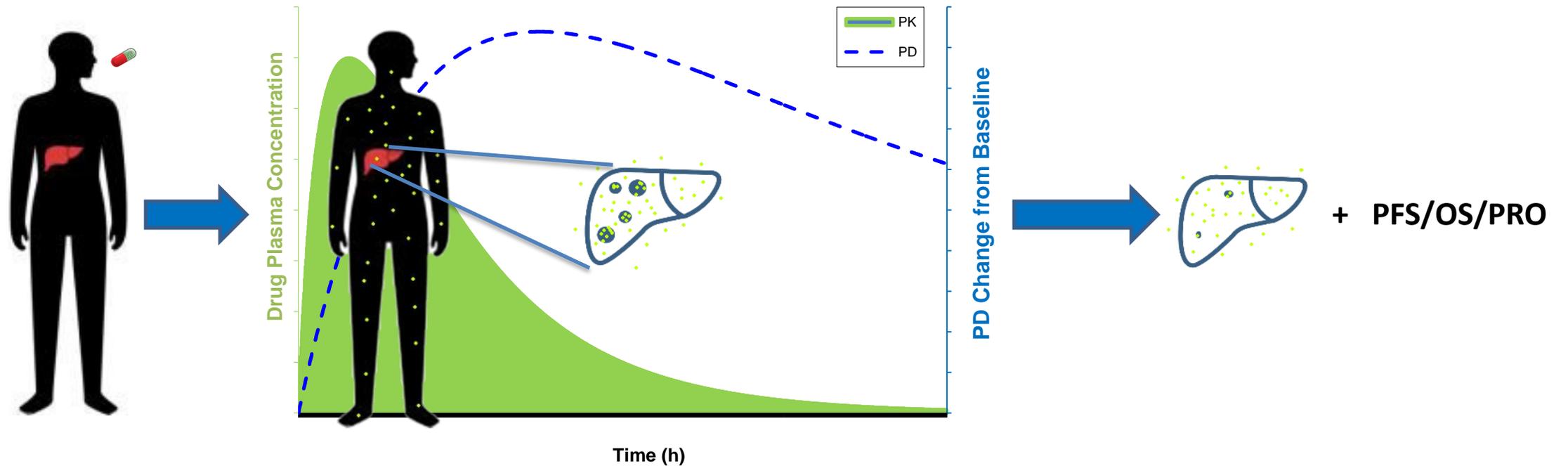
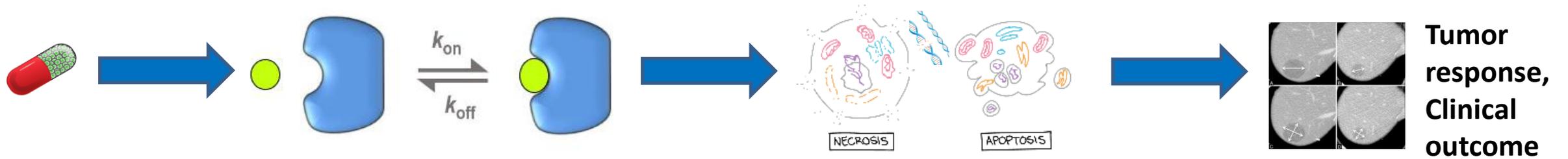
- Drug not being used in clinical practice or withdrawal (e.g., recent PI3K ODAC) - Built your house on quicksand
- Postmarketing Study

2011	2012	2013	2014	2015	2016	2017
ipilimumab vandetanib abiraterone rivaroxaban vemurafenib brentuximab vedotin crizotinib deferiprone ruxolitinib asparaginase <i>Erwinia</i> <i>chrysanthemi</i>	glucarpidase axitinib vismodegib peginesatide pertuzumab carfilzomib ziv-aflibercept tbo-filgrastim enzalutamide bosutinib regorafenib omacetaxine cabozantinib ponatinib	pomalidomide T-DM1 radium RA-223 trametinib dabrafenib afatinib obinutuzumab ibrutinib	ofatumumab ramucirumab siltuximab ceritinib belinostat idelalisib pembrolizumab blinatumomab olaparib nivolumab	panobinostat palbociclib lenvatinib dinutuximab sonidegib trifluridine trabectedin cobimetinib osimertinib daratumumab ixazomib necitumumab elotuzumab alectinib	venetoclax atezolizumab olaratumab rucaparib	ribociclib niraparib midostaurin brigatinib durvalumab avelumab rituximab SC neratinib enasidenib inotuzumab tisagenlecleucel gemtuzumab copanlisib abemaciclib

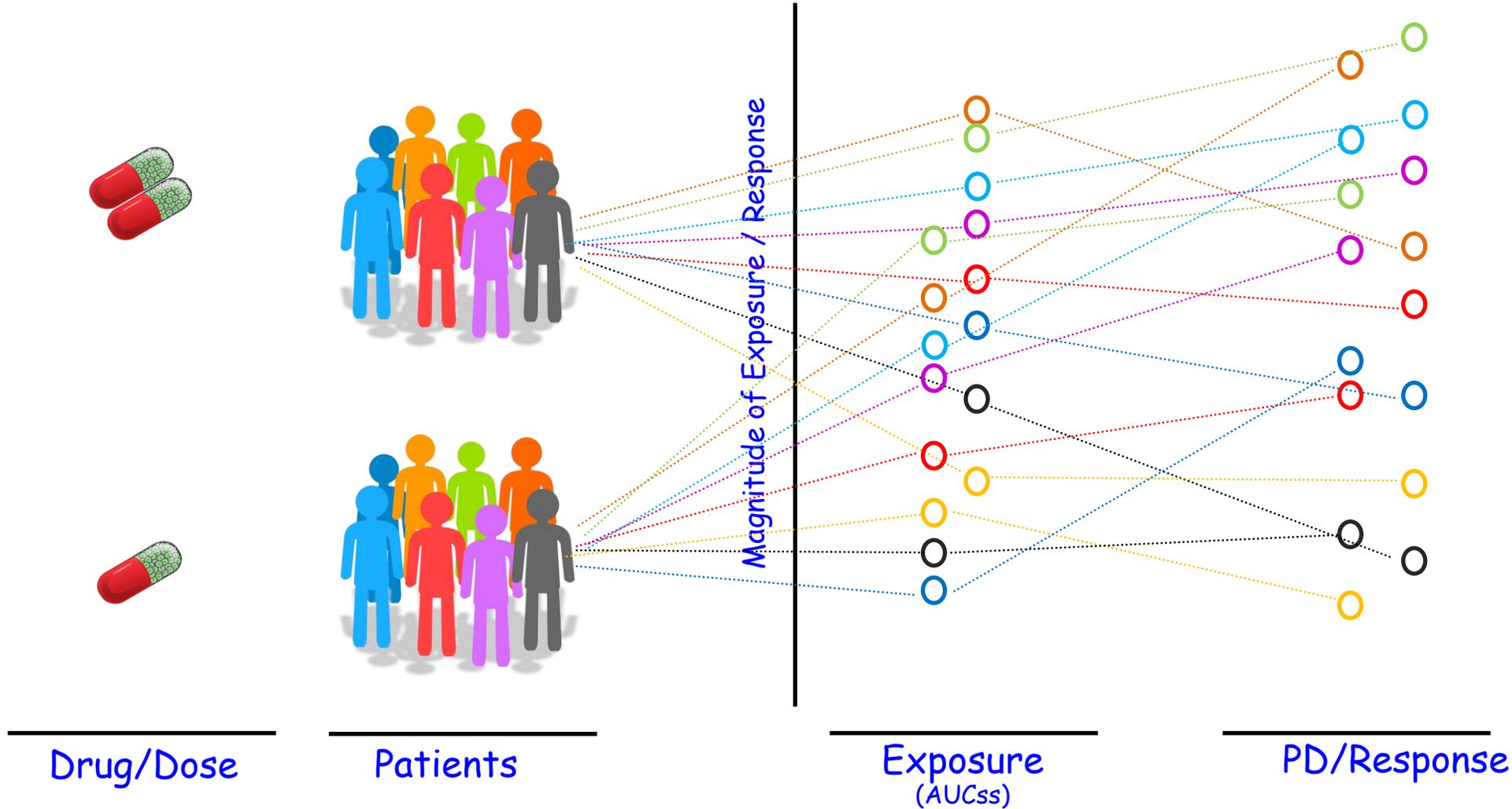
Premarket Dose Optimization Is Preferred

- Prevents large number of patients from experiencing avoidable toxicity
- More efficient to evaluate multiple doses early in development
 - Challenging to conduct dose optimization trials post-approval
- Earlier understanding of dose-exposure-response allows for
 - More rapid expansion to new indications
 - Development of combination regimens
- Increases the likelihood of successfully bringing a drug to market

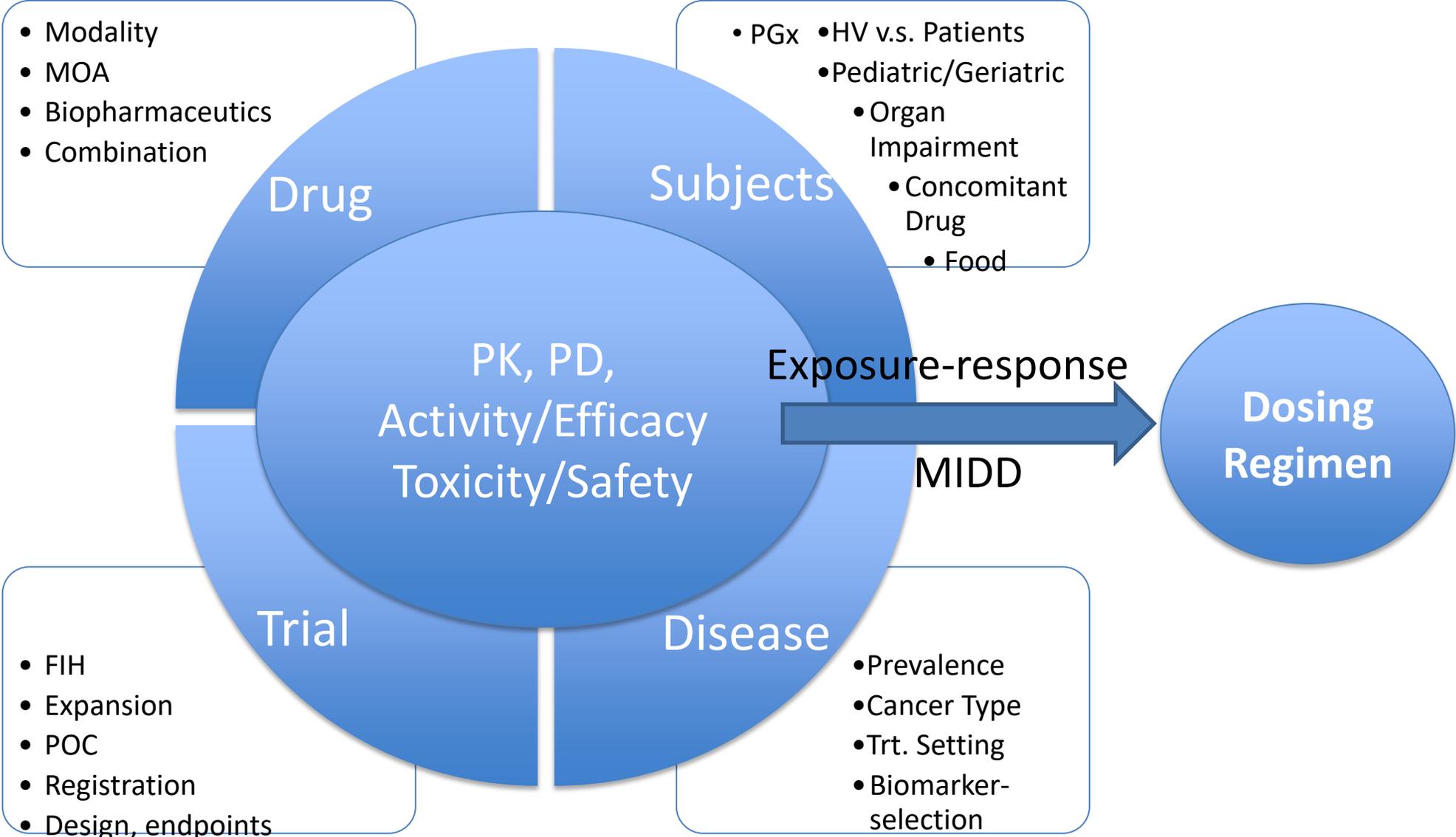
Drug Action: Dose-Exposure-(PD)-Outcomes



Source of Variability



Factors Affect Dose Finding & Optimization



Drug Factors for Dose Selection - Modality

Modality: CT, MTA, mAb, IO, ADC, BsAbs, RNAi

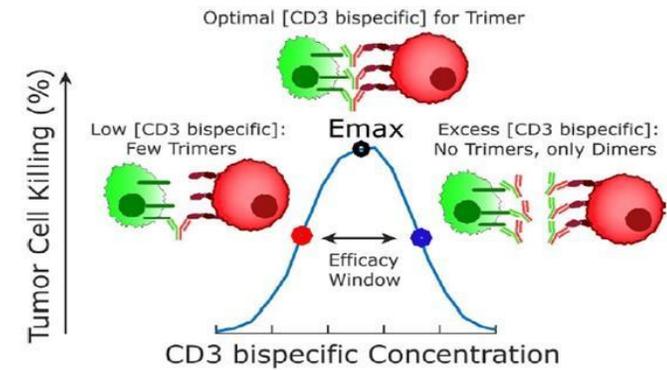
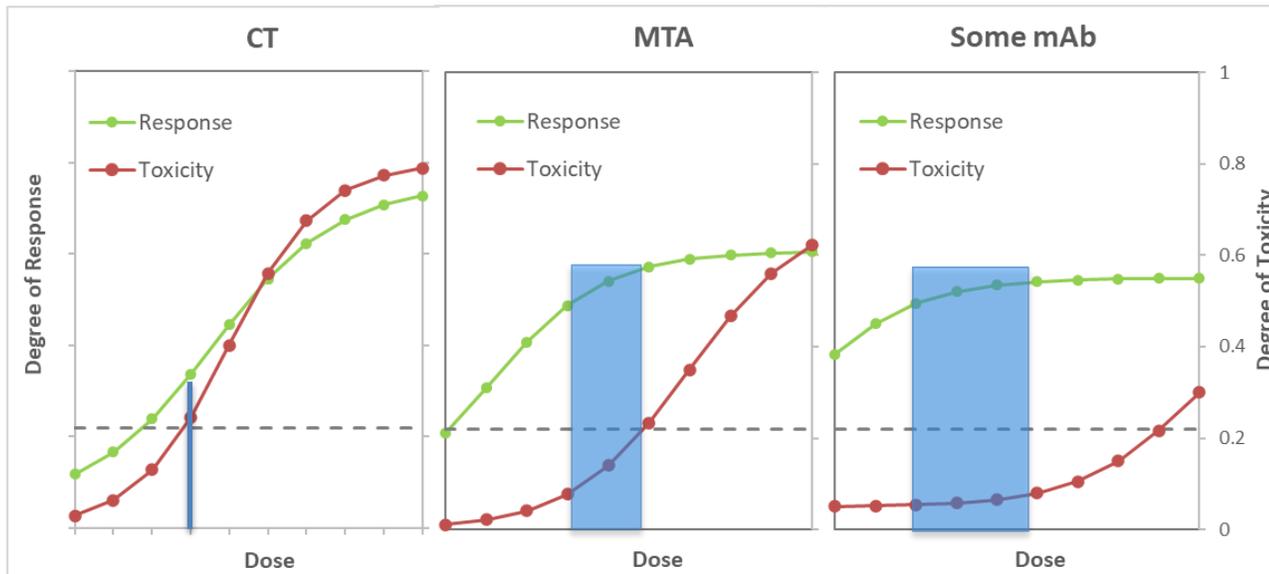
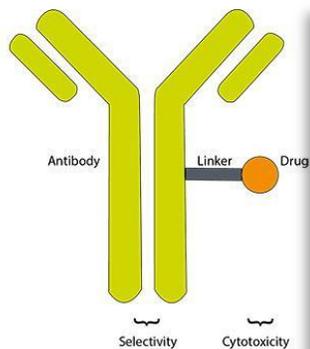


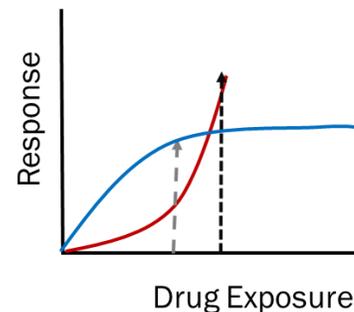
Figure 2 Bell-shaped concentration response relationship observed for CD3 bispecific antibodies. E_{max}, maximum effect.

Alison Betts, [Clin Pharm & Ther, 2020](#)

ADC:

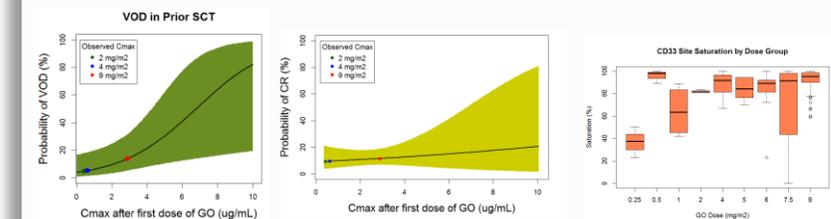


- Multiple moieties contributing to safety and efficacy
- Therapeutic range - **Narrow!**



Gemtuzumab ozogamicin (Mylotarg) accessdata.fda.gov

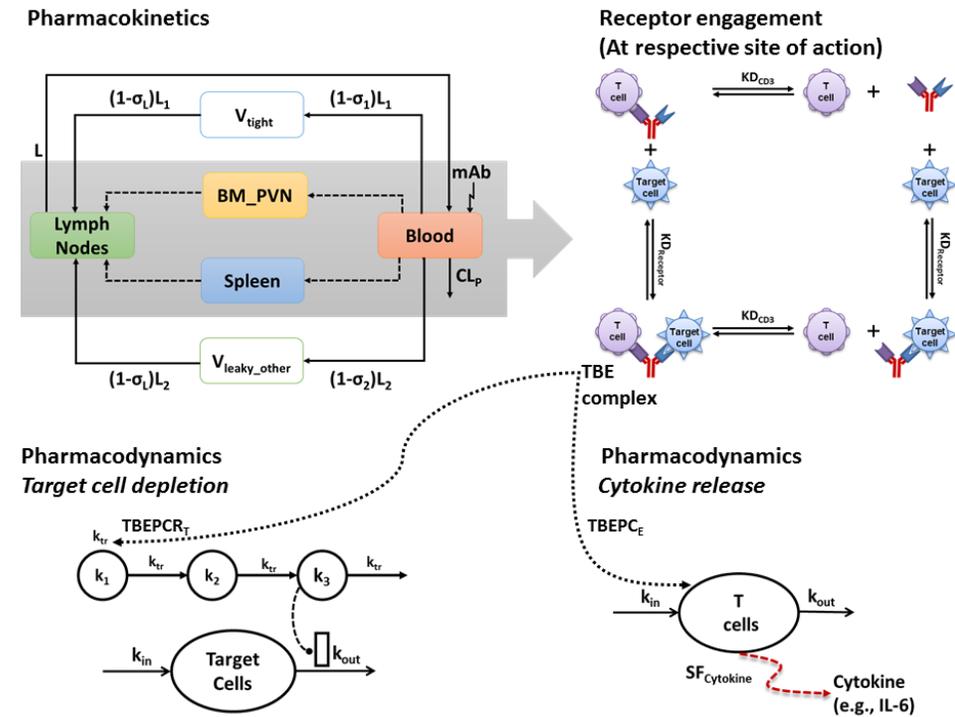
9 mg/m² -> withdrawal -> fractionated dose (3 mg/m² on Day 1, 4, 7)



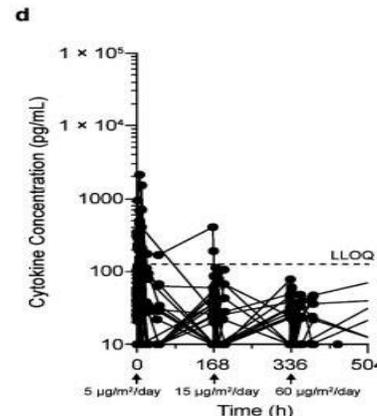
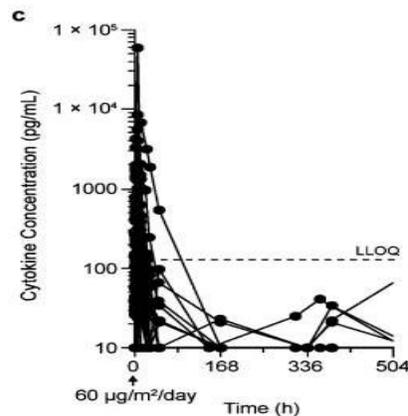
Drug Factors for Dose Selection - MOA

MOA: class specific effect (activity/toxicity), FIC? Metabolite?

- Target-related ‘class’ effects (e.g. KIs)
 - Dermal toxicity (Acneiform rash) for EGFR
 - Hypertension and ocular toxicity for VEGFR
- Immune agonists:
 - MABEL
 - CRS/IRR – stepwise priming dosing for BiTE



Blinatumomab

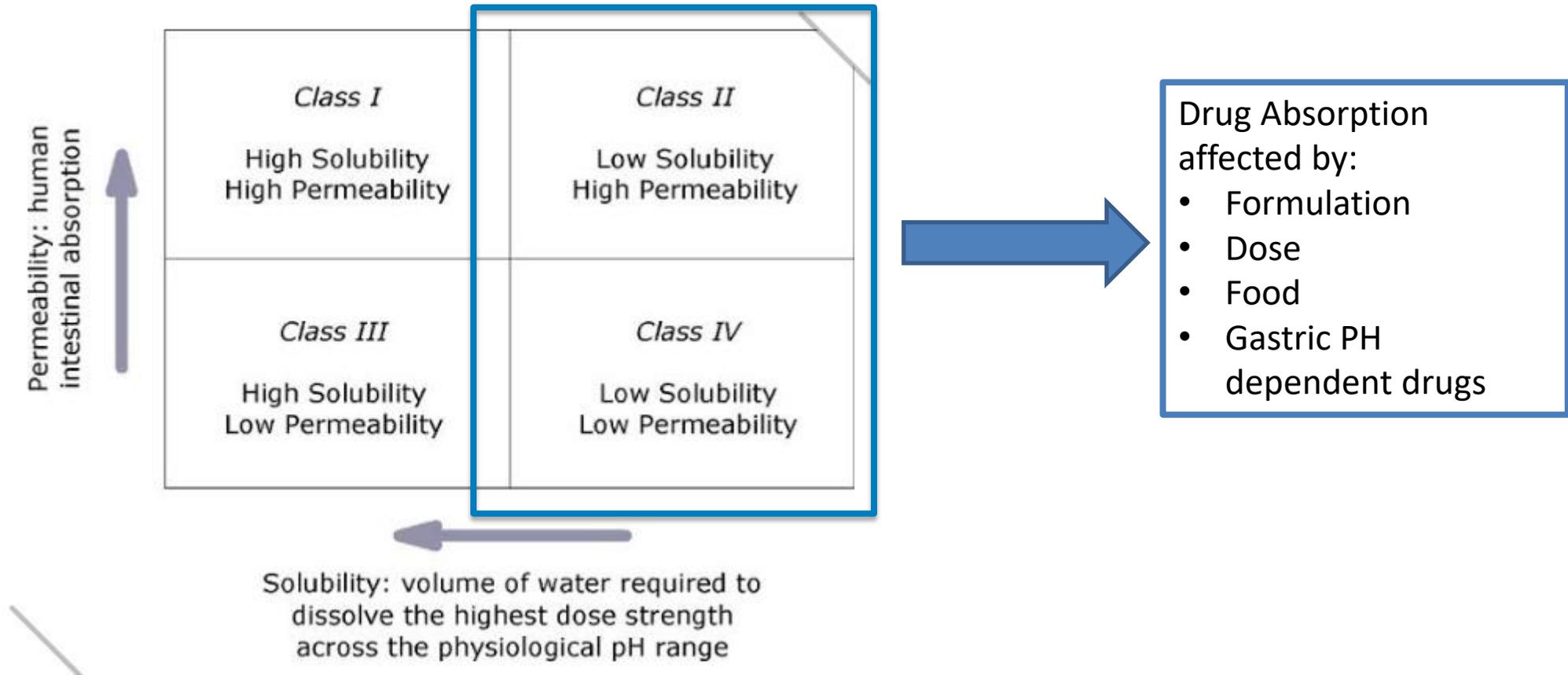


Jiang X, et al. MAb. 2018

Drug Factors for Dose Selection - Biopharmaceutics



- Biopharmaceutics Classification System (BCS) and formulation



Drug Factors for Dose Selection - Combination



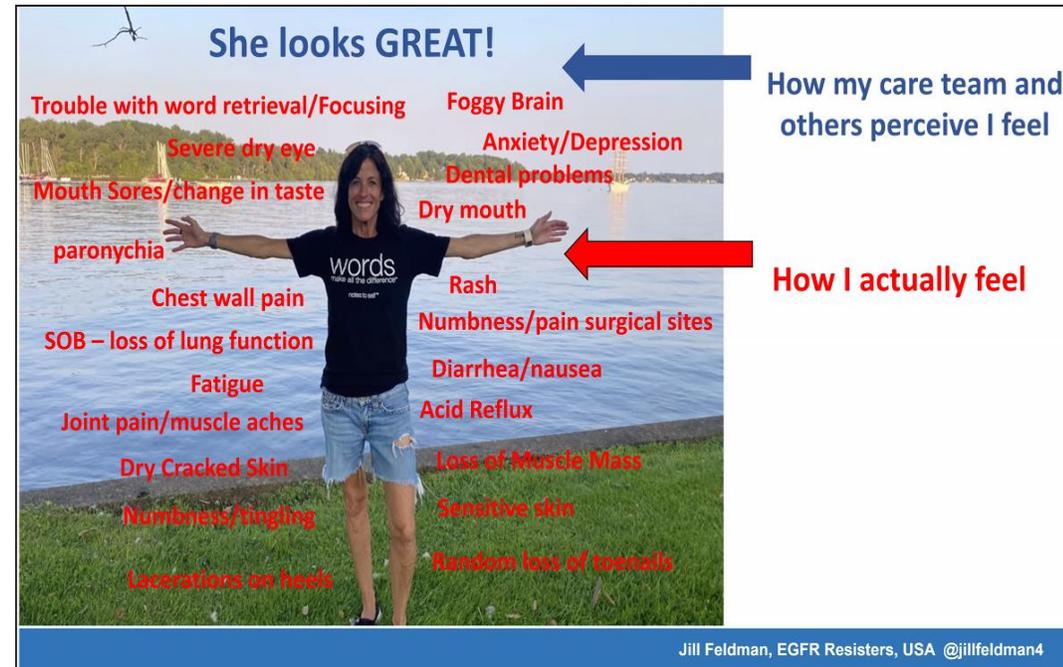
Complex Journey

- Data to support the biological activity and safety of the combination (based on nonclinical or clinical)
 - Assess potential PK and PD interaction
 - Additivity, synergy, or detrimental?
- Combination scenarios:
 - Both agents are approved: combinations anchored around the approved doses
 - One approved agent with a novel agent: 1) anchored at the approved dose first and evaluate different dose levels of the novel agent; 2) additional dose optimization of the approved agent around the several dose levels of the novel agent
 - Two novel agents: 1) dose finding for each agent alone; 2) full factorial combination
- Use totality of data with modeling and simulation to explore various scenarios

Subject Factors for Dose Selection

- Intrinsic

- Age
- Body size
- Gender
- Race
- Organ impairment
- Disease
- Genetic polymorphism
- Pregnancy
- ...



- Extrinsic

- Food/Diet
- Concomitant Drug
- Herbal products
- Smoking
- Alcohol
- ...

FDA-ASCO Workshop: Getting the Dose Right.

Subject Factors for Dose Selection

– Ceritinib Food Effect



- Ceritinib (**BCS IV**) **750 mg** original approved for the treatment of ALK positive metastatic NSCLC
- Dose selection: escalation - expansion phase (fasting)

Dose Level (mg)	50	100	200	300	400	500	600	700	750
Number of subjs (n)	2	2	3	3	14	10	10	5	10 (MTD)

- >60% dose reduction/interruption mainly due to AR (GI toxicity: N/V/abdominal pain/diarrhea)
- Food effect (↑ 58% (low-fat meal) and 73% (high-fat meal)) study was completed almost after the Phase 1 study

Gastrointestinal	750 mg without Food (N=255)		400 mg without Food (N=108)	
	All Grades (%)	Grade 3-4 (%)	All Grades (%)	Grade 3-4 (%)
Diarrhea	86	6	59	1
Nausea	80	4	43	1
Vomiting	60	4	38	

Dose was decreased to **450 mg** with food based on the PMR

Disease Factors for Dose Selection

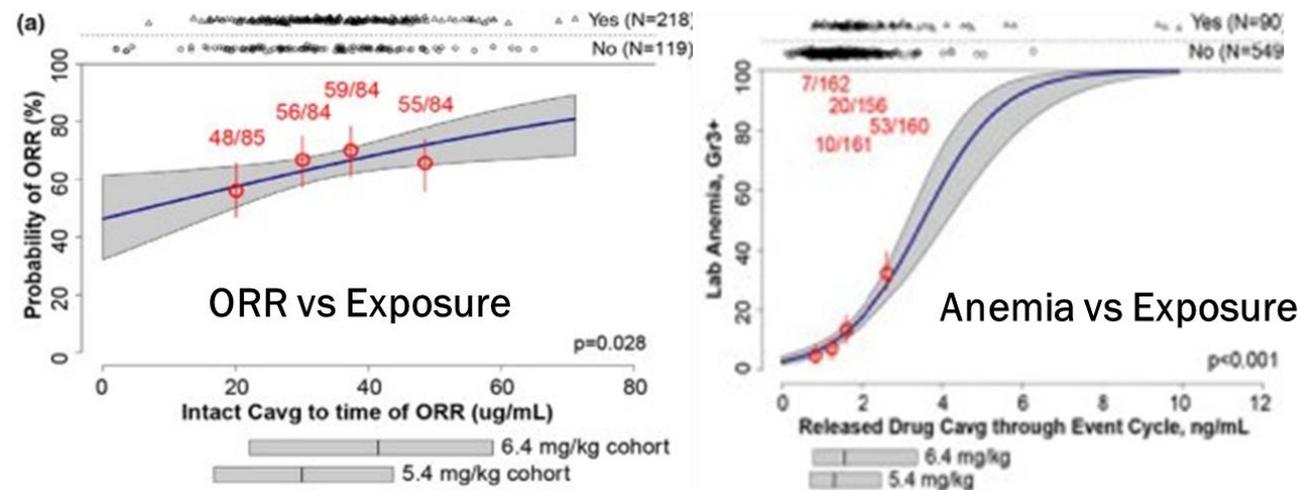
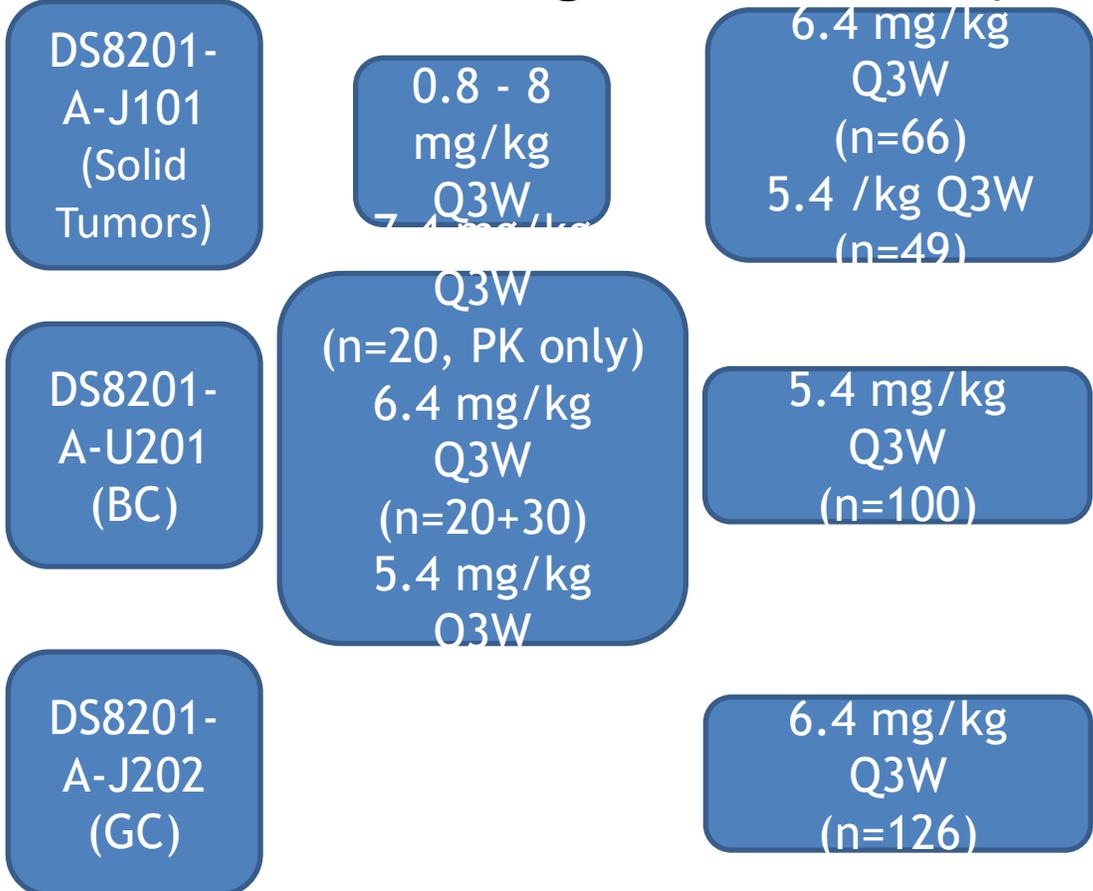
- Rare disease – feasibility of a specific dose finding trial?
- Indications/disease stage (tumor type, adjuvant-neoadjuvant-metastatic setting, treatment setting, genomic)
 - PI3K Inhibitors (idelalisib, copanlisib, duvelisib, umbralisib)
 - Different benefit/risk ratio among diseases -> Different dosing strategies
- Biomarker-selection

Disease Factors for Dose Selection

- Trastuzumab Deruxtecan (T-DXd)



HER2-directed antibody-drug conjugate for the treatment of HER2-positive breast cancer or gastric cancer (**5.4 or 6.4 mg/kg Q3W, respectively**)



	T-DXd (ADC)		
	C _{max} (µg/mL)	AUC _{last} (µg/mL*d)	C _{trough} (µg/mL)
Breast cancer (BC)			
5.4 mg/kg (n=232)	124 (33)	545 (163)	5.5 (5.1)
Gastric cancer (GC)			
6.4 mg/kg (n=149)	126 (28)	597 (152)	5.6 (3.1)

Trial Factors for Dose Selection

Preclinical	FIH - Escalation	Expansion - POC	Confirmation	Lifecycle
<p>Safe dose for first in human evaluation</p> <ul style="list-style-type: none"> • Pharmacology – MOA • General (or special) Toxicology • PK/TK/PD • Allometric • NOAEL/STD/ HNSTD/MABEL 	<p>Clinical Safety, PK, biological doses</p> <ul style="list-style-type: none"> • Escalation, highest dose, duration and schedule • Trial design (population, sample size, duration ...), data collection, information process 	<p>Two main goals:</p> <ul style="list-style-type: none"> ▪ POC in targeted patients ▪ Selection of dose(s) for confirmatory trials <ul style="list-style-type: none"> • Understand efficacy • Understand key safety • D-E-(PD)-R 	<p>Confirm clinical benefit/risk</p> <ul style="list-style-type: none"> • A&WC trial(s) • Confirm safe and effective dose in general and specific population 	<p>Safety monitoring and continual dose optimization/individualization</p> <ul style="list-style-type: none"> • PMR/PMC • RWD/RWE

Case Example 1: Sotorasib

DOSE FINDING/OPTIMIZATION:
FROM LAB TO LIFECYCLE

Approval Information

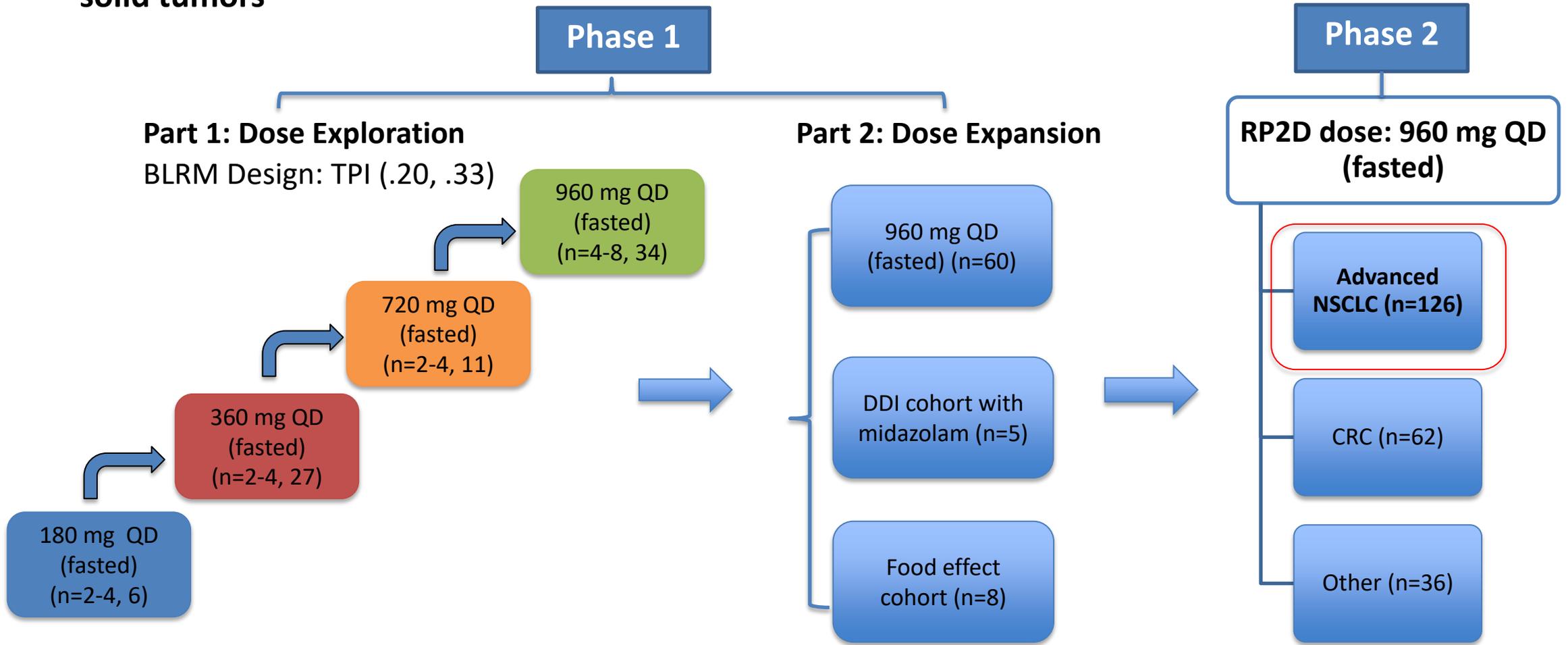


- First approved (AA, OR) KRAS inhibitor for NSCLC with KRAS G12C mutation
 - Efficacy: ORR: 36% (28%, 45%), mDOR: 10 m
 - Safety: SAE (50%), Dose interruption/reduction due to AE (22%), Grade 3+ TEAE (59%), Diarrhea (43%), Nausea (27%)
- Approved Dosage
 - **960 mg** orally once daily (QD) with or without food
- A dose-finding PMR study to investigate a lower dosage (**240 mg QD**) is required

Study CodeBreak 100



A single-arm, open label, multicenter study of sotorasib in patients with *KRAS p.G12C*-mutated solid tumors



1st: Safety & tolerability, MTD
2nd: PK, PD, food, QT

Pharmacology for Dose Selection

- Pharmacology studies support the mechanism of action
 - Sotorasib binds irreversibly to the P2 pocket of KRAS and inhibits the SOS1-catalyzed nucleotide exchange of KRAS^{G12C} (IC₅₀ = 92.6 nM; ~51.9 ng/mL) thereby locking KRAS^{G12C} in the inactive GDP-bound conformation
 - Sotorasib does not inhibit WT KRAS
 - Sotorasib reduced ERK1/2 phosphorylation and exhibited in vivo anti-tumor activity at 10 mg/kg against xenografts expressing KRAS^{G12C}, but not KRAS^{G12V} or KRAS^{G12D}
- TGI models predicted 30 to 240 mg QD as clinical biological doses

Dose-Exposure of Sotorasib

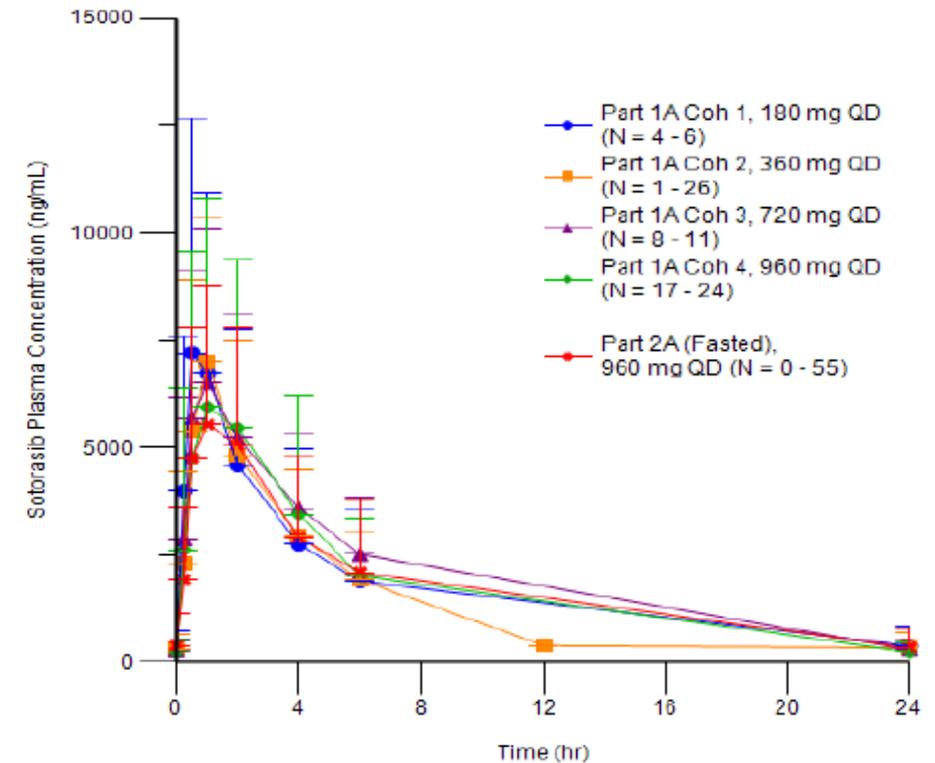
- Similar steady-state exposure among doses 180 mg to 960 mg

Steady-State PK Parameters

Dose (mg)	N	t _{max} (hr)	C _{max} (µg/mL)	AUC _{0-24h} (hr*µg/mL)	t _{1/2,z} (hr)
180	6	0.75 (0.50 – 1.0)	6.44 (7.63, 67%)	33.5 (41.7, 85%)	5.38 (5.96, 46%)
360	25	1.0 (0.25 – 4.0)	5.97 (7.01, 46%)	37.4 (42.4, 50%)	5.52 (5.71, 28%) ^a
720	11	1.0 (0.50 – 4.0)	5.45 (6.76, 50%)	43.9 (50.8, 49%)	4.92 (5.06, 24%) ^b
960	25	1.0 (0.50 – 24)	4.91 (6.57, 69%)	32.4 (42.2, 71%) ^d	4.79 (5.03, 28%) ^c

Data presented as geometric mean (arithmetic mean, CV%) for all PK parameters except for T_{max}, which is presented as median (range).

Steady-State PK Profiles



No Clear Dose-Response Trend for Efficacy Observed Among Doses

	Sotorasib Monotherapy in NSCLC				Proposed dose
	180 mg QD Fasted (N=3) Phase 1	360 mg QD Fasted (N=16) Phase 1	720 mg QD Fasted (N=6) Phase 1	960 mg QD Fasted (N=34) Phase 1	960 mg QD Fasted (N=123) Phase 2
ORR n (%)	1 (33)	4 (25)	3 (50)	16 (47)	46 (37)
95% CI	(0.8, 90.6)	(7.3, 52.4)	(11.8, 88.2)	(29.8, 64.9)	(28.8, 46.6)

Although limited in sample size, ORR data suggested that lower dose could provide acceptable effectiveness for the proposed indication.

Opinions during Drug Development

- from Regulatory and Community

FDA recommended dose optimization during IND:

*“We notes that .., which **does not support** your proposed rationale of ... FDA recommends that Amgen **includes additional dose finding cohort ... to optimize the dose.**”*

Applicant did not follow FDA's recommendation during IND stage on exploring additional dose cohorts for dose optimization.

Empowering the FDA to Require Dose Optimization of All New Oncology Drugs

By Mark J. Ratain, MD, FASCO, and Allen S. Lichter, MD, FASCO
January 25, 2021

- “There is no evidence that the dosing regimen used in the Amgen pivotal trial (960 mg daily fasting) is optimal. In fact, it is likely that a much lower dose of the drug administered with food may have a superior therapeutic index.”
- “ We urge the FDA to require Amgen to optimize the dose as a condition of the likely accelerated approval .”

Proposed 960 mg Dose is not Optimized

- Failed to translate the nonclinical, biopharmaceutics, Dose-Exposure-Response information into dose selection decision:
 - In vitro target saturation occurs at exposure levels with lower doses
 - Similar steady-state exposure among doses 180 mg to 960 mg
 - No clear dose-response trend for efficacy observed among doses
- Safety concerns (i.e., local GI toxicities) associated with high dose
- High pill burdens (8 tablets)

PMR for dose optimization: Investigate a lower dosage that may provide comparable efficacy with improved safety as compared to 960 mg

Case Example 2: Osimertinib

**DOSE FINDING/OPTIMIZATION:
FROM LAB TO LIFECYCLE**

Approval Information

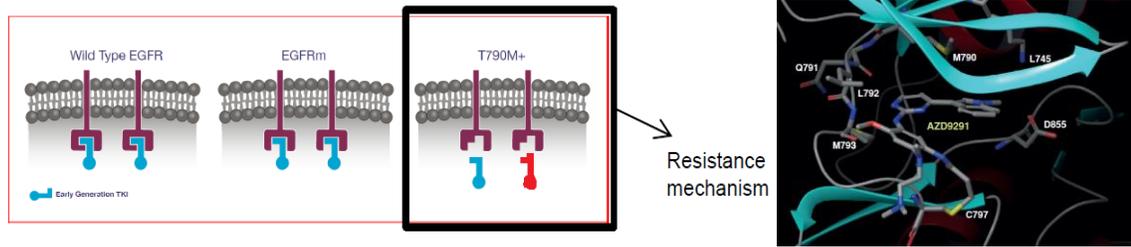


- 3rd generation EGFR kinase inhibitor for NSCLC:
 - with **metastatic EGFR T790M mutation** (after previous EGFR TKI therapy)
 - with exon 19 deletions or exon 21 L858R mutations (as adjuvant therapy or first-line treatment for metastatic cancer)
- Approved Dosage
 - **80 mg** orally once daily (QD) with or without food
- Drug Discovery Initiation -> (4 ys) FIH -> First FDA AA approval (2.5 ys, OR) -> FDA regular approval (1.5 ys., OR)

Drug Development Was Supported by Robust Non-clinical Platforms

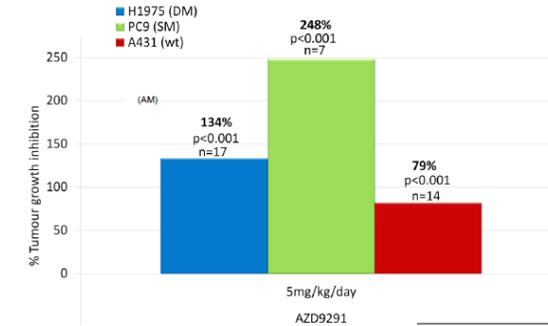


- Specific chemistry design (target & mechanism)



Gefitinib, erlotinib, afatinib

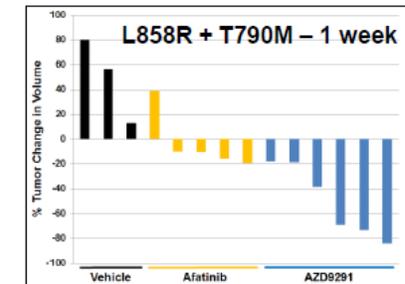
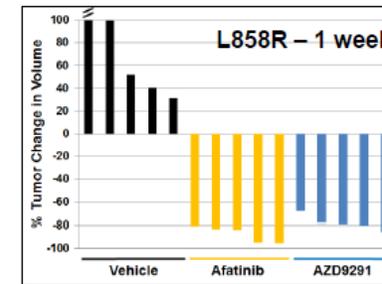
- Xenograft disease models



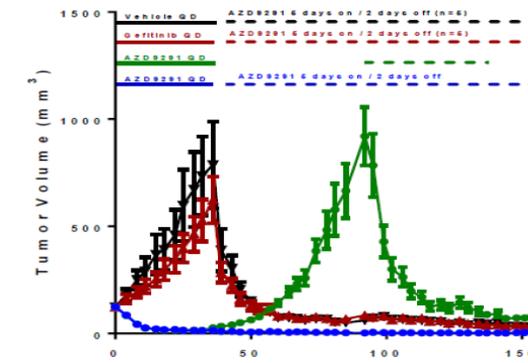
- Specific cell line models

Clinical EGFR mutation	Cell line model
Exon 19 del	PC-9, H1650, HCC827, (HCC4006)*
L858R	H3255, (11-18)*
Ex19del/ T790M	PC-9VanR
L858R/ T790M	H1975
Wild-type EGFR	A431, H2073, LoVo

- Transgenic mouse models



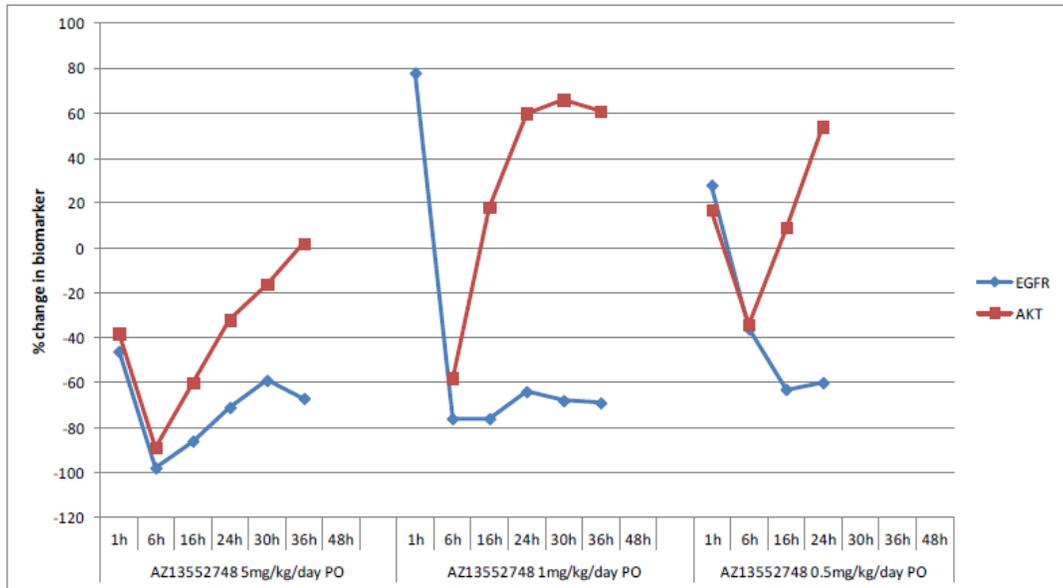
- Patient derived explant models



Solid NonClinical Dose-Activity Evaluation

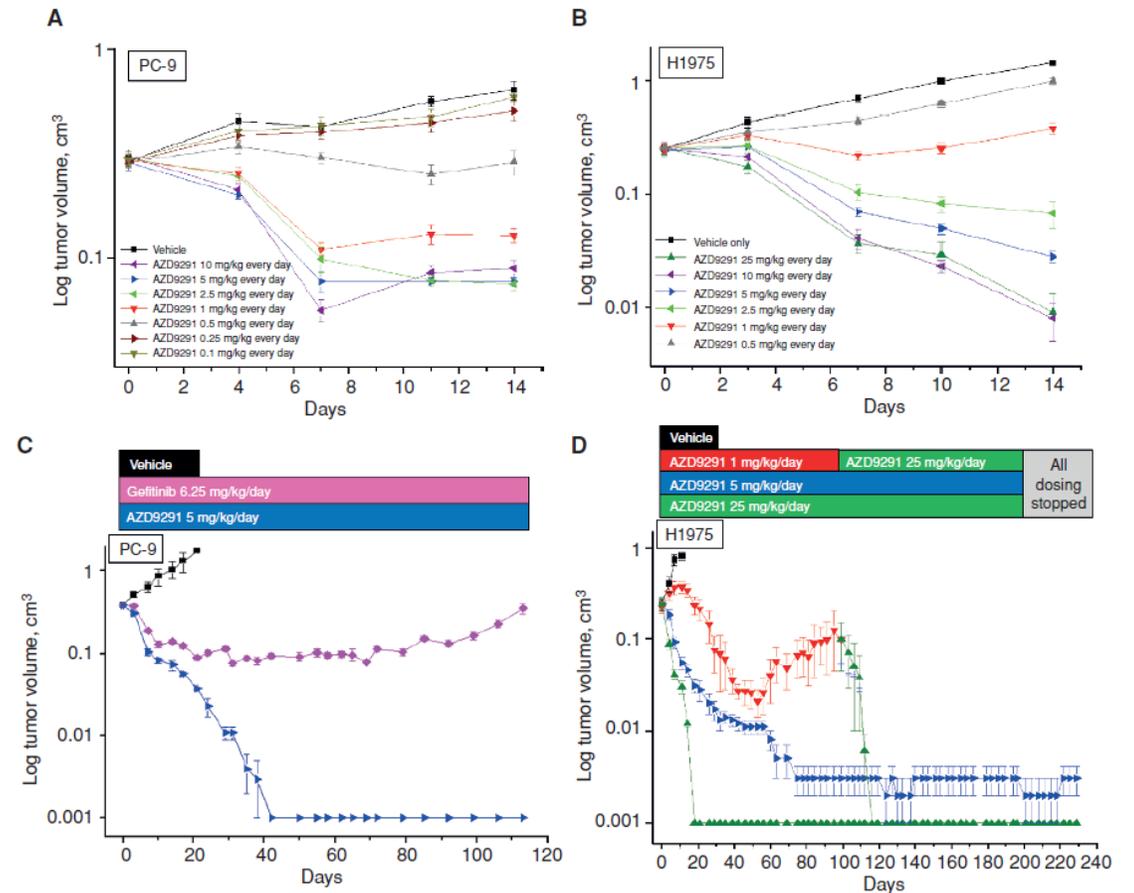


- Pharmacodynamic data



% change in phospho/total ratios for EGFR and Akt in response to osimertinib (AZ13552748) in H1975 xenograft model

- Antitumor activity

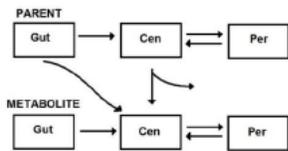


Cross et al. (2014) Cancer Discovery, 4, 1046-1061

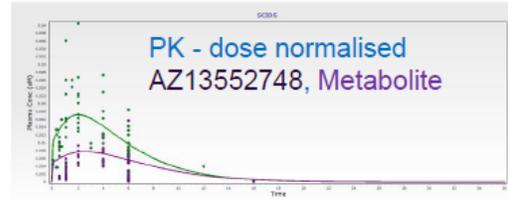
Strong Predictive Modeling for Forward Translation and Dose Finding



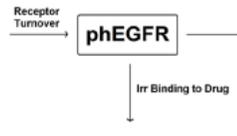
PK model parent, metabolite



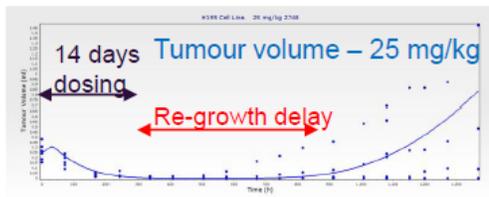
PK



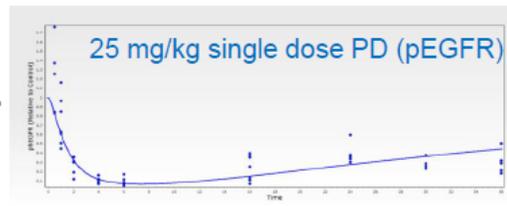
PD



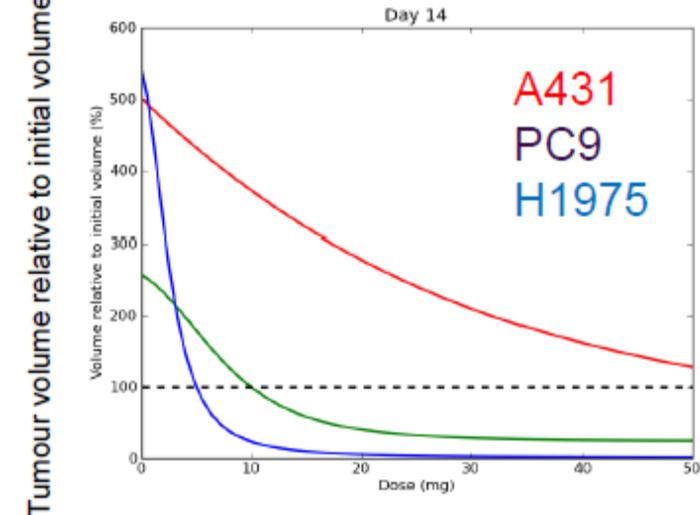
PK-PD-TGI model describes data for doses used in efficacy/PD studies



TGI



Full scale

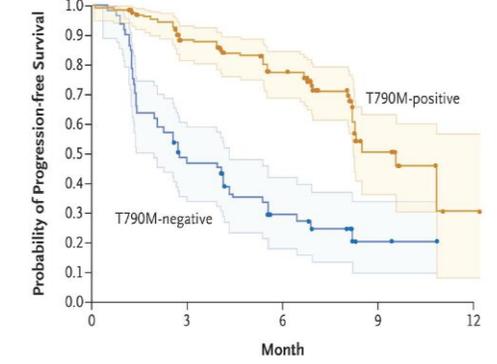
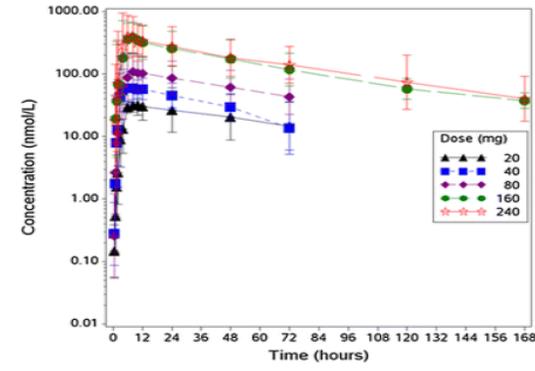
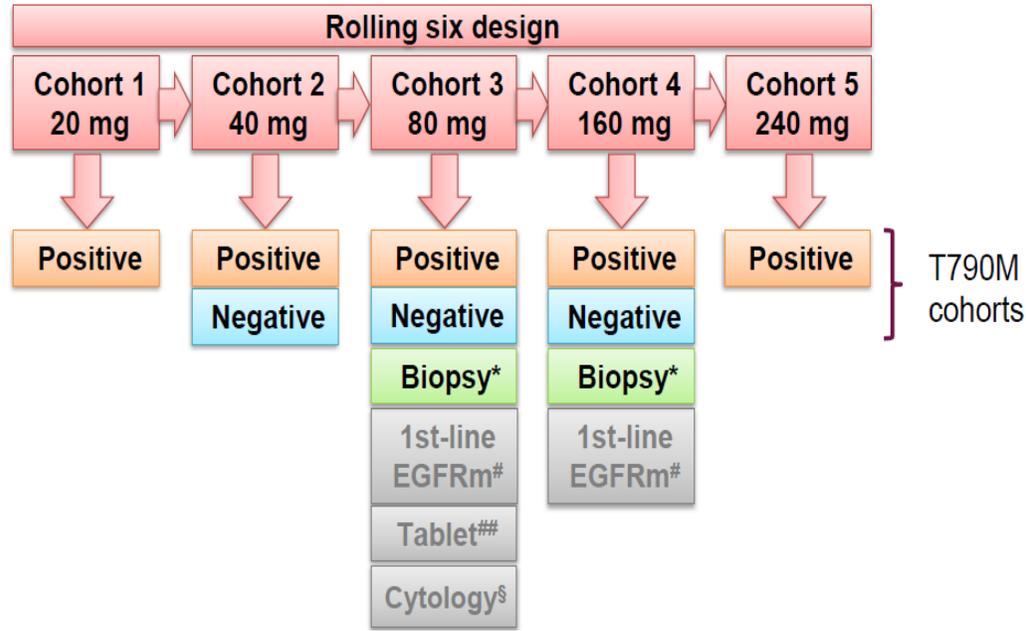


Modeling support taking drug into clinic and predict the first dose of 20 mg in human should provide antitumor activity

AURA Phase I Trial

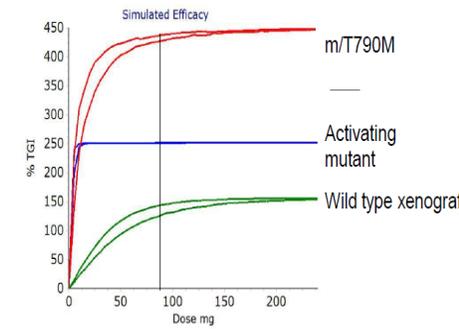
Escalation
Not preselected by T790M status

Expansion
Enrolment by local testing followed by central laboratory confirmation (cobas™ EGFR Mutation Test) of T790M status or by central laboratory testing alone



Response rate in T790M positive cohorts

	20 mg	40 mg	80 mg	160 mg	240 mg	Total
N (157)	10	32	61	41	13	157
ORR (95% CI)	50% (19, 81)	59% (41, 76)	66% (52, 77)	51% (35, 67)	54% (25, 81)	59% (51, 66)



Phase II extension: AZD9291 80 mg once daily in patients with T790M positive NSCLC who have progressed on EGFR-TKI

AZD9291 appeared less tolerable at doses above 80 mg with more incidence of:

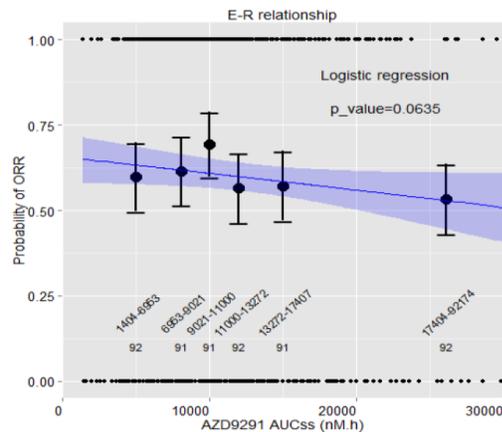
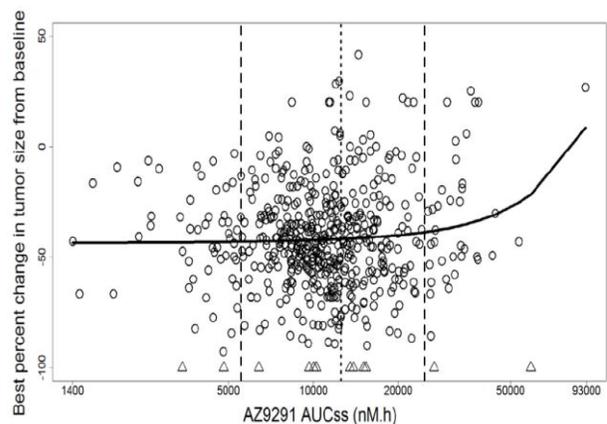
- Skin disorders, nail effects and diarrhea (~doubling)
- Severe grade 3+ AE
- Dose reductions due to AE

AURA and AURA 2 Phase II Trial (T790M+)

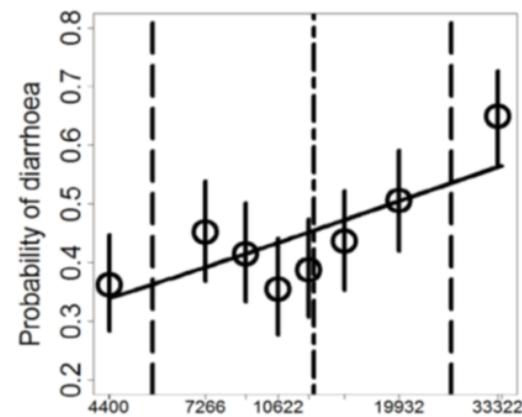
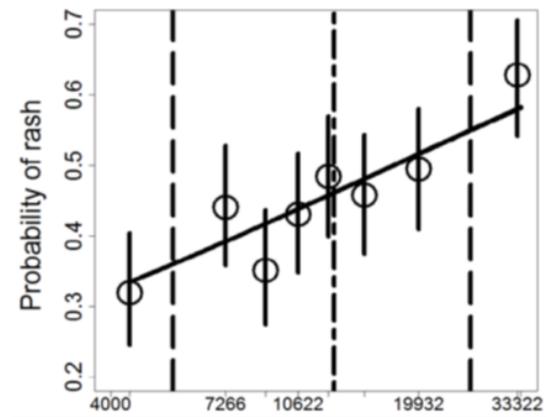


Efficacy Measure (BICR)	Aura Extension (n=201)	AURA2 (n=210)	Pooled (n=411)
Confirmed Objective Response Rate (95% CI)	57% (50, 64)	61% (54, 68)	59% (54, 64)
Complete Response	0	1%	0.5%
Partial Response	57%	60%	59%

ER for Efficacy



ER for Safety



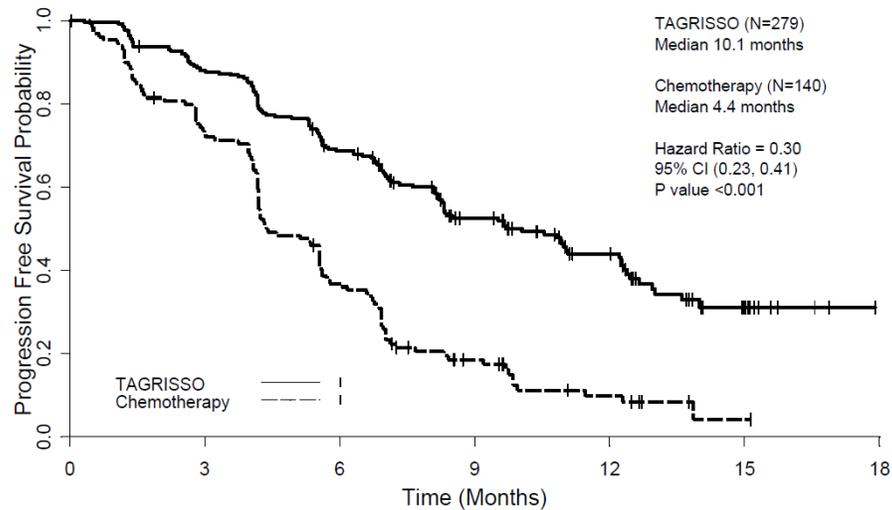
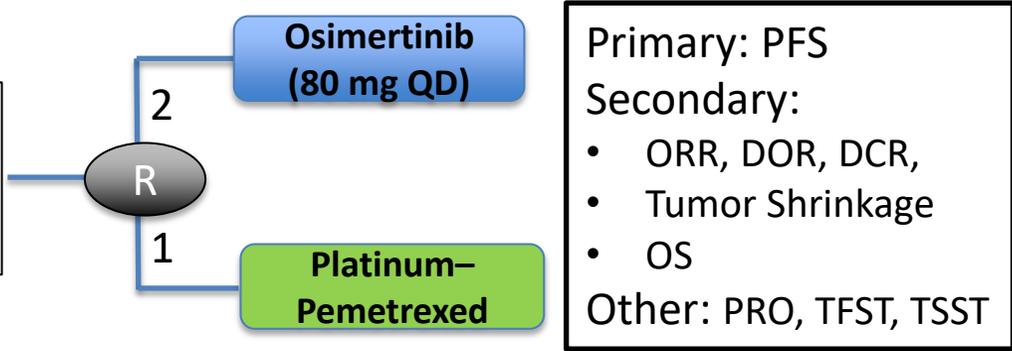
AZD9291 AUCss (nM.h)

AURA3 Phase III Trial vs. Chemo (T790M+)

Initiated before AA



Locally Advanced/Metastatic NSCLC with EGFR T790M mutation (after previous EGFR TKI therapy) (n=419)



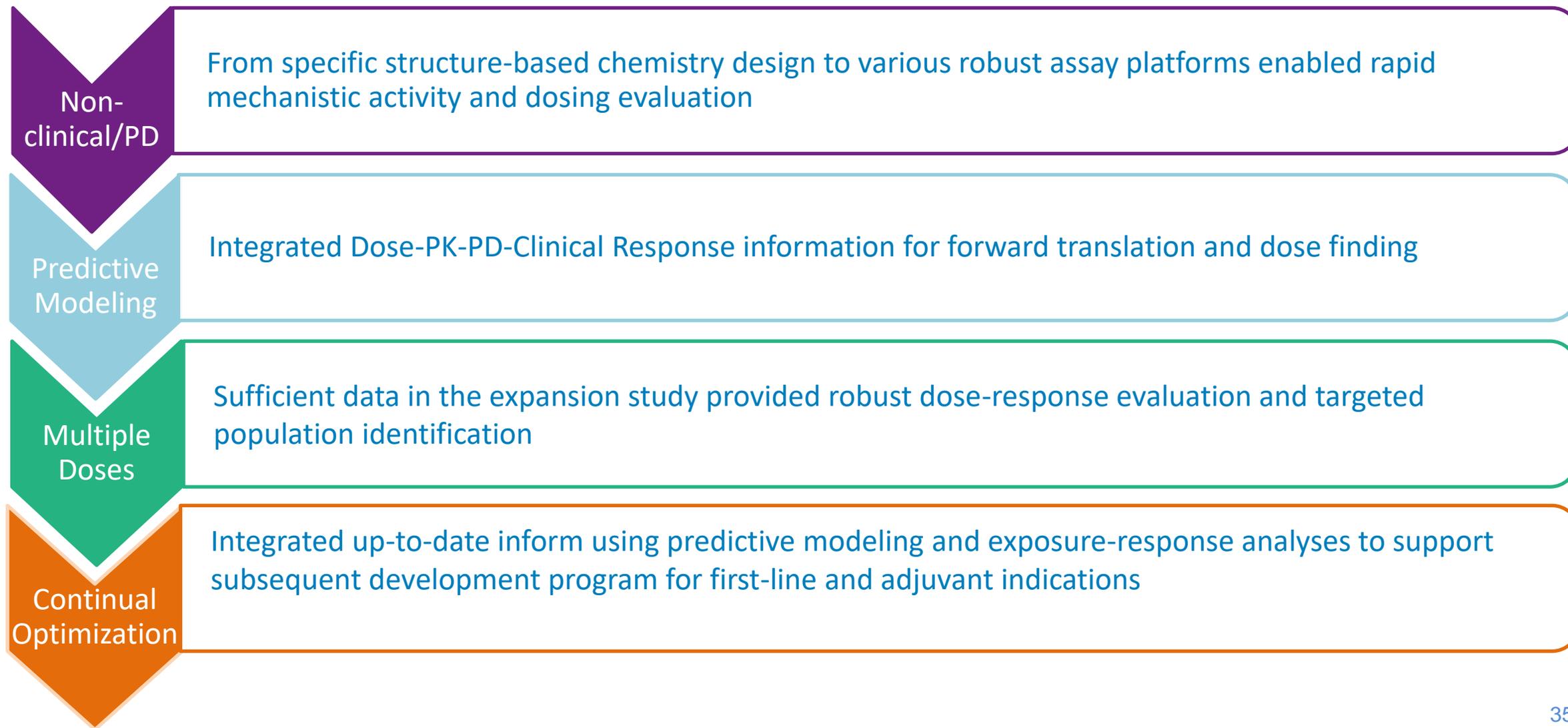
Number at risk

	0	3	6	9	12	15	18
TAGRISSO 279	279	240	162	88	50	13	0
Chemotherapy 140	140	93	44	17	7	1	0

Tick marks represent censored observations

Efficacy Parameter	TAGRISSO (N=279)	Chemotherapy (N=140)
Objective Response Rate*		
Objective Response Rate	65%	29%
(95% CI) ^{b, f}	(59%, 70%)	(21%, 37%)
Complete response	1%	1%
Partial response	63%	27%
P-value	<0.001	
Duration of Response (DoR)		
Median Duration of Response in months (95% CI)	11.0 (8.6, 12.6)	4.2 (3.0, 5.9)

Osimertinib – Summary of Dose Finding/Optimization



A Holistic Dose Finding/Optimization Approach



Iterative process as new nonclinical and clinical data become available

- Nonclinical evaluation

- Activities - MOA

- Cell based assay and animal models (xenograft, transgenic, patient derived explant)
- Target engagement (IC50 , IC90)
- PD markers for patient/dose selection

- Toxicities

- Attribution of toxicities to study drug
- Management strategy
- MRSD

- PK/PD assessment for forward translation

- Predictive modeling integrating Dose-Exposure-PD-Outcome for biologic dose

A Holistic Dose Finding/Optimization Approach <2>



Iterative process as nonclinical and clinical data become available

- Early clinical development

- Dose finding trial

- Evaluate both safety, PK, and activity
- Evaluate toxicity/tolerability information beyond DLTs or DLT evaluation window if possible
- Flexible to include additional patients, tumor types, dose levels, schedules, formulations, food condition
- Model-based approach for repeated measures
- Use of priors from non-clinical and other clinical information in the Bayesian model

- **Dose comparison trial** (may not need to be a standalone trial)

- Include sufficient number of targeted patients at biologic doses
- Randomization
- Consider adaptive design to allow impact of 'Real-time' data on within-trial decisions

- **MIDD** for Dose-Exposure-PD-Outcome with up-to-date nonclinical and clinical data to inform patients and dose(s) selection for subsequent trials

A Holistic Dose Finding/Optimization Approach <3>



Iterative process as nonclinical and clinical data become available

- Late clinical development
 - Conduct population PK and exposure-response assessment for registration trial(s) using relevant efficacy and safety/tolerability endpoints including dose modifications and PROs
 - Consider ‘dose individualization’ if needed
- Lifecycle: Continual dose optimization/individualization post marketing
 - Postmarketing trials, potentially with RWD/RWE

Clin Pharm to Inform Dose Finding and Optimization



Preclinical

Dose Escalation & Expansion

Dose Comparison

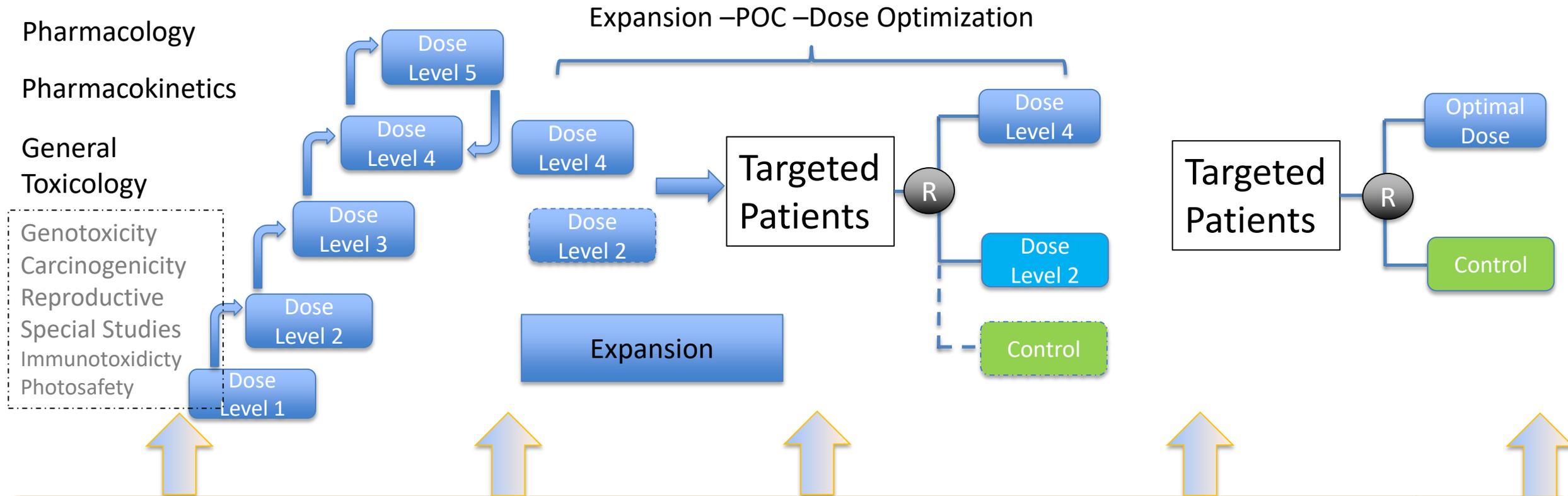
Confirmation

Pharmacology

Pharmacokinetics

General Toxicology

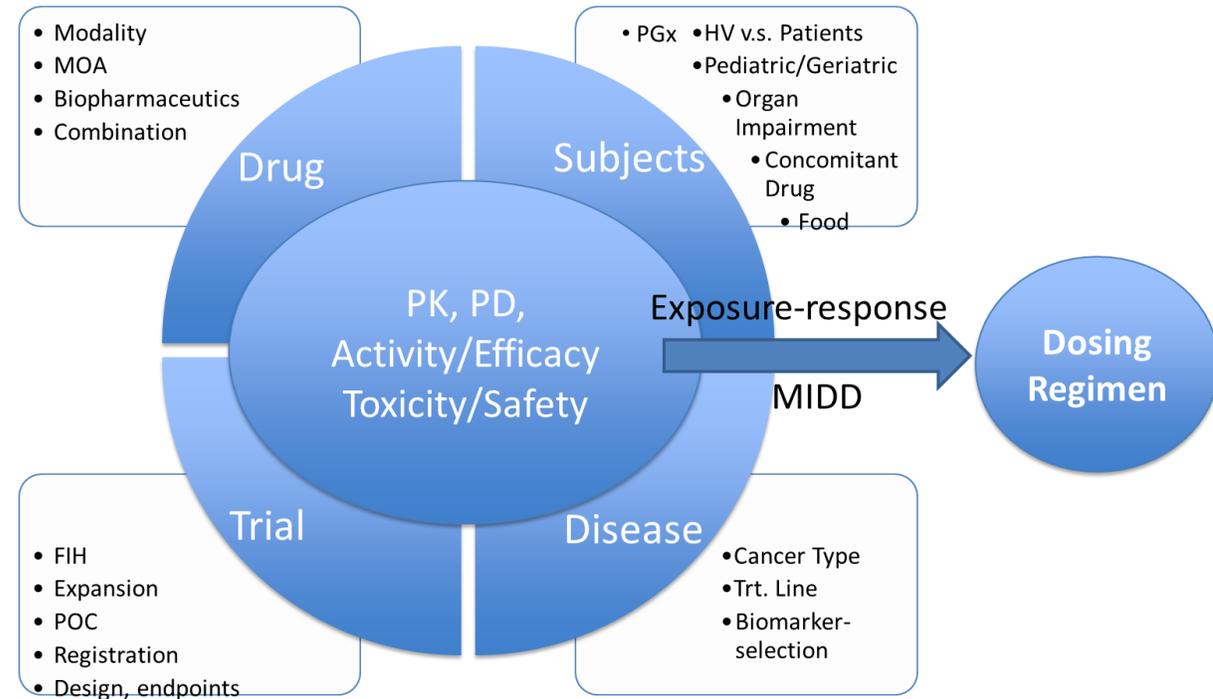
Genotoxicity
Carcinogenicity
Reproductive
Special Studies
Immunotoxicity
Photosafety



ClinPharm Opportunity: translating -> clinical starting dose, dose escalation step & range; biomarker/biologic dose/schedule/targeted patient identification; POC dose(s)- *RP2D*; dose approval- benefit/risk, individualized dosing; lifecycle optimization. MIDD: dose-exposure-PD-response

Summary

- Dose optimization is an essential component of developing safe and effective cancer therapies and should be conducted prior to drug approval
- Pragmatic and holistic approach for dose finding and optimization will require multidisciplinary collaboration to establish a solid understanding of dose-exposure-PD-response relationships for activity/efficacy, and safety/tolerability
- Multiple dosages should be evaluated with a sufficient number of targeted patients in a clinical trial(s) to decrease uncertainty with identifying an optimal dosage(s)



MIDD: Dose-Exposure-PD-response -> Benefit/Risk

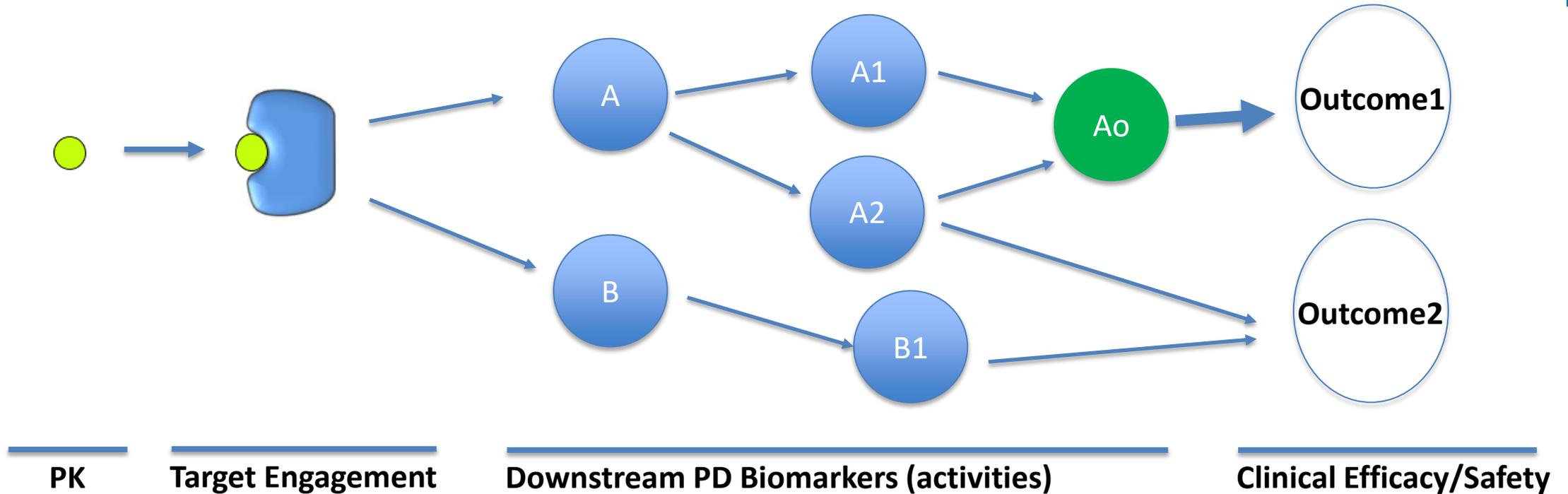
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- Colleagues in Office of Clinical Pharmacology



THANK YOU!

Use of Biomarker for Dose Selection



- PD biomarkers generally are more sensitive to drug effects (e.g., ctDNA, TGI):
 - smaller sample size and shorter duration.
- Selection of biomarker:
 - MoA, physiological response pathway, and disease pathophysiology and process;
 - Ideally with strong correlation, but may not need to be a validated surrogate for clinical outcomes.

PMR Dose Comparison Trial

- ~170 patients randomized 1:1
 - 240 mg QD (2 x 120 mg tablets) vs. 960 mg QD (8 x 120 mg tablets)
- Rationale for 240 mg dose selection:
 - Dose expected to be above concentration associated with 90% inhibition in vitro
 - Dose expected to approximate exposure at doses 180 mg and 360 mg daily
 - 120 mg tablet readily available
- Endpoints:
 - ORR, TEAEs, SAEs, and event of interest (EOIs), PK

A dosing regimen will be established based on the totality of data with respect to the efficacy, safety and clinical pharmacology endpoints.

Examples

- BLC2001: phase 2, included a multicenter, randomized, adaptive cohort of 2 dosages of **erdafitinib** that informed selection of a 3rd dosage for evaluation in the single-arm registration cohort (supported accelerated approval for locally advanced or metastatic urothelial carcinoma)
- KEYNOTE-001: phase 1, included a randomized, dose-comparative, activity estimating cohort of **pembrolizumab** at 2 dose levels (supported accelerated approval for relapsed metastatic melanoma)
- KEYNOTE-010: phase 2/3, multicenter, randomized adaptive study of IV **pembrolizumab** at two dosing schedules vs. docetaxel (supported regular approval for metastatic non-small cell lung cancer)

Recipe FOR Success of Project Optimus



Patient Advocacy

- Communicate expectations
- Provide input for rational drug development
- Participate in dose optimization trials

Industry and Academics

- Conduct adequate dose optimization trials
- Continue dose optimization throughout drug development
- Invest in innovative approaches
- Interact with FDA

Regulatory

- Provide Guidance
- Facilitate regulatory pathways
- Support innovation in trial design

