Challenges and Opportunities for QSP in Drug Development and Regulatory Evaluation

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Three Objectives for Today's Talk

- Provide a brief overview of history & current state of MIDD approaches and their use in drug development & regulatory evaluation.
- Provide a perspective on current barriers to routine application of QSP models in drug development & regulatory evaluation
- Provide a perspective on what we should do next

1980s	MIKS	Modelling & Simulation	
1990s	SP & PMs	Pharmacometrics Systems Pharmacology	

1980s

1990s

Pharmacometrics
Systems Pharmacology

Modelling & Simulation

FDA Modernization Act of 1997 (FDAMA), Sec. 115a

MARCH 1997





COMMENTARY

Learning versus confirming in clinical drug development

Lewis B. Sheiner, MD San Francisco, Calif.

COMMENTARY

Hypothesis: A single clinical trial plus causal evidence of effectiveness is sufficient for drug approval

Carl C. Peck, MD, Donald B. Rubin, PhD, and Lewis B. Sheiner, MD Washington, DC, Cambridge, Mass, and San Francisco, Calif

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CLINICAL PHARMACOLOGY & THERAPEUTICS



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MID3: "A quantitative framework for prediction and extrapolation, centered on knowledge and inference generated from integrated models of compound, mechanism and disease level data and aimed at improving the quality, efficiency and cost effectiveness of decision making"

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28





(time, resources, data, buy-in from management)

Current Barriers to Routine Application of QSP Models in Drug Development & Regulatory Evaluation: A Personal Perspective

- Perception matters
 - ✓ PBPK models are:
 - User-friendly black boxes
 - Click here, click there, click everywhere
 - ✓ QSP are:
 - Structurally complex
 - Require a lot of data
 - Have challenges with scaling to long-term endpoints/outcomes
 - Everyone has their own favorite model
- Modelers cannot seem to agree on tools, standards, and terminology so how are other stakeholders supposed to buy in?

Let's Go Back To The Idea Behind Modeling & Simulation



Let's Go Back To The Idea Behind Modeling & Simulation



Three key questions that define the context of modeling and simulation:

- 1) What do we want to know?
- 2) How certain do we need to be?
- 3) What are we willing to assume?

What Do We Want to Know? Selecting the Right Tools for the Right Question



What Do We Want to Know? Selecting the Right Tools for the Right Question



What Do We Want to Know? Selecting the Right Tools for the Right Question



It's a modeling continuum, not a modeling competition!





Derendorf H and Schmidt S (ed.) Rowland and Tozer's Clinical Pharmacokinetics and Pharmacodynamics: Concepts and Applications. Fifth Edition. Wolters Kluwer, Alphen aan den Rijn, Netherlands, 2019, 1-939, Sörgel F. Chemotherapie Journal (2003)



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- Gender, Race
- Drug-drug interactions
- Environmental factors
- Concomitant diseases
- Placebo effect
- Drug receptor or enzyme polymorphisms
- Tolerance, tachyphylaxis

Additional factors to consider:

- Uncertainty in disease pathways
- Monogenic vs. polygenic diseases
- Endogenous (e.g., receptor, protein) vs. exogenous (e.g., pathogens) targets

\rightarrow Opportunity for QSP models:

 Preclinical-clinical translation (e.g., mapping complex physiological pathways, identifying targets for drug prioritization)

100

80

60

40

20

0

Incidence (%)

- Identification of optimal combination (chemo)therapy
- Establish virtual twins for rare diseases
- Understand biomarker dynamics \rightarrow inform clinical trial design



- **Drug-drug interactions** Environmental factors •
- Concomitant diseases
- Drug metabolism polymorphisms
- Adherence



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Variability in PK



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Variability in PK



Variability in PK



Variability in PD (exogenous target)



Mangal et al. Clin Pharmacol Ther. 2018 Nov;104(5):957-965. doi: 10.1002/cpt.1012.

Variability in PK





Probability of Achieving C_{trough}/MIC>2



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0,
PTA (%)
~ 100
~ 100
~ 100
~ 100
~ 100

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Probability of Achieving C_{trough}/MIC>2



Low susceptibility, MIC = 8 mg/L

Phenotype	PTA (%)
UM non-pantoprazole	<5
EM/IM non-pantoprazole	<5
UM pantoprazole	<5
EM/IM pantoprazole	<5
Overall	<5

High susceptibility, MIC = 0.015 mg/L	
Phenotype	PTA (%)
UM non-pantoprazole	~ 100
EM/IM non-pantoprazole	~ 100
UM pantoprazole	~ 100
EM/IM pantoprazole	~ 100
Overall	~ 100

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	8/ -
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UM non-pantop	razole <5
EM/IM non-panto	prazole <5
UM pantopra:	zole <5
EM/IM pantopr	azole <5
Overall	<5

Low susceptibility. MIC = 8 mg/L

Intermediate susceptibility, MIC = 1 mg/L

Phenotype	PTA (%)
UM non-pantoprazole	23.2
EM/IM non-pantoprazole	39.9
UM pantoprazole	46.5
EM/IM pantoprazole	64.9
Överall	43.6

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Overall	~ 100 _10	
	49	

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MIC (mg/L) Measurement error (2-fold increments in MIC determination)

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EM/IM non-pantoprazole	<5
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UM partoprazole	<2
EM/IM pantoprazole	<5
Overall	<5

Intermediate susceptibility, MIC = 1 mg/L

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PBPK: Focus on process characterization





PBPK: Focus on process characterization

Pop-PK: Focus on parameter identifiability & estimation





Physiologically-based models

Pharmacokinetics



Focus on characterization of ADME (PK) processes (typically well-known)

Physiologically-based models

QSP models

Pharmacokinetics





Focus on characterization of ADME (PK) processes (typically well-known)

Zhao et al. Clin Pharmacol Ther. 2011;89: 259-67.

Karelina et al. CPT Pharmacometrics Syst Pharmacol. 2016 Nov;5(11):608-616. doi: 10.1002/psp4.12129.



Figure 1 Schematic representation of key processes considered in the model. (a) Eosinophil (EOS) dynamics and regulations. (b) Cytokine dynamics and regulations. Black arrows denote model reactions. Positive and negative influences are marked by dashed green and red arrows, correspondingly. Abnormal processes switched on in asthmatics (sensitization of model processes and regulations by other cytokines and interleavism (IL)-5/IL-13 production by non-EOS) are marked by thick green arrows.

Focus on characterization of complex processes involved in drug response (oftentimes less well-known)



Pharmacodynamics

Physiologically-based models

$E = m \cdot \log C + b$ $E = \frac{E_{max} \cdot C}{EC_{50} + C}$

$$E = \frac{E_{max} \cdot C^n}{EC_{50}^n + C^n}$$

QSP models

Pharmacodynamics



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Focus on characterization of complex processes involved in drug response (oftentimes less well-known)

Key question: How confident are we in our assumptions?

60

A clopidogrel case example:

- Clopidogrel is an irreversible P2Y12 inhibitor inhibition of platelet aggregation
- > Approved in 1997 by U.S. FDA
- Reduces the risk of major adverse cardiovascular events (MACE):
 - Myocardial infarction
 - Stroke
 - Cardiovascular death
 - Stent thrombosis
- Large between-patient variability in response to clopidogrel treatment (Boxed warning from FDA)

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Research Question: Can we use our knowledge on the underlying metabolic pathways to identify clinically-relevant sources of between-patient variability?

Samant S et al. Clin Pharmacol Ther. 2017 Feb;101(2):264-273. doi: 10.1002/cpt.459. Epub 2016 Oct 11.

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Impact of Time Scale on Model Granularity: Translating Short-Term Behaviour Into Long-Term Outcome





Gaitonde et al. Clin Pharmacol Ther. 2018 Oct;104(4):699-708. doi: 10.1002/cpt.998. Epub 2018 Feb 1.



Gaitonde et al. Clin Pharmacol Ther. 2018 Oct;104(4):699-708. doi: 10.1002/cpt.998. Epub 2018 Feb 1.

FSI. pmol/L (88.2)









Gaitonde et al. Clin Pharmacol Ther. 2018 Oct;104(4):699-708. doi: 10.1002/cpt.998. Epub 2018 Feb 1. Farhan et al. J Clin Pharmacol. 2021 Feb;61(2):234-243. doi: 10.1002/jcph.1728. Epub 2020 Sep 7.



Here Is What I Think We Should Do Next

- Focus on building consensus rather than silos. It's a modeling continuum, not a modeling competition.
- Consider model reusability (e.g., develop accessible modeling platforms that are qualified in the context of use (may require the use of competitor drugs))
- Foster transdisciplinary approaches

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PDUFA 6: Regulatory Decision Tools

AG

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Citation: CPT Pharmacometrics Syst. Pharmacol. (2019) 8, 352-355; doi:10.1002/psp4.12425 PERSPECTIVE Pharmacometrics, Physiologically Based Pharmacokinetics, Quantitative Systems Pharmacology-What's Next?—Joining Mechanistic and Epidemiological Approaches

Stephan Schmidt^{1,*}, Sarah Kim¹, Valvanera Vozmediano¹, Rodrigo Cristofoletti¹, Almut G. Winterstein² and Joshua D. Brown²



Dabigatran Case Example

> Dabigatran:

- ✓ Factor IIa inhibitor
- ✓ G-pg substrate
- ✓ Low oral bioavailability
- ✓ Primarily cleared via the kidneys
- Dose reduction is recommended only in subjects with impaired renal function



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RWE Results: Impact of P-gp Inhibitors in Subjects With Normal Renal Function

	HR (95% CI)		
Bleeding categories	Dabigatran	Rivaroxaban	Apixaban
Verapamil or diltiazem vs amlodipine			
Overall bleeding	1.52 (1.05-2.20) ^a	0.99 (0.71-1.38)	0.89 (0.49-1.63)
Overall GI bleeding	2.16 (1.30-3.60) ^a	0.64 (0.37-1.09)	0.70 (0.25-1.99)
Major/moderate bleeding	2.27 (0.97-5.29)	1.23 (0.65-2.35)	1.57 (0.35-7.16)
Major/moderate GI bleeding	2.27 (0.72-7.11)	0.51 (0.17-1.53)	2.17 (0.11-43.08)
Minor bleeding	1.56 (1.07-2.27) ^a	0.95 (0.68-1.35)	0.87 (0.47-1.63)
GI minor bleeding	2.16 (1.29-3.63) ^a	0.62 (0.35-1.09)	0.70 (0.25-1.99)
Verapamil or diltiazem vs metoprolo			
Overall bleeding	1.43 (1.02-2.00) ^a	0.76 (0.55-1.06)	0.78 (0.45-1.36)
Overall GI bleeding	2.32 (1.42-3.79) ^a	0.72 (0.42-1.22)	0.86 (0.40-1.86)
Major/moderate bleeding	3.32 (1.54-7.16) ^a	0.99 (0.50-1.98)	1.46 (0.33-6.41)
Major/moderate GI bleeding	5.49 (1.67-18.03) ^a	0.73 (0.23-2.25)	0.42 (0.02-8.71)
Minor bleeding	1.38 (0.98-1.95)	0.75 (0.54-1.06)	0.67 (0.37-1.21)
GI minor bleeding	2.33 (1.42-3.82) ^a	0.72 (0.42-1.24)	0.86 (0.40-1.86)

Dabigatran dose reduction may have to be considered in subjects with normal renal function receiving P-gp inhibitors

https://www.pradaxapro.com/dosing-administration

Pham et al. JAMA Netw Open. 2020 Apr 1;3(4):e203593. doi: 10.1001/jamanetworkopen.2020.3593.

Dabigatran + Cobicistat

Dabigatran + Ritonavir



Dabigatran + Cobicistat

Dabigatran + Ritonavir



- ✓ Dabigatran should be <u>avoided</u> in subjects with severe renal impairment when co-administered with RTV/COBI.
- In subjects with moderate renal impairment and receiving RTV, <u>dose separation</u> or dabigatran <u>dose reduction to 110 mg b.i.d.</u> may be necessary.
- ✓ In subjects with moderate renal impairment and receiving COBI, dabigatran dose should be reduced to 75 mg b.i.d.
- ✓ <u>No</u> dabigatran <u>dose adjustments</u> are needed in subjects with normal renal function receiving RTV.
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