Clinical Drug Development with a Bayesian Lens

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Acknowledgements

Meg Gamalo Karen Price Scott Berry John Seaman

The Beginning is Always the Hardest





APPROVAL









What would it look like if **SUBSTANTIAL EVIDENCE**

was based on a

Bayesian posterior probability

p-value(s)?

Pr (drug works) > threshold

Drug – Placebo > 0 Pr (drug works) > threshold

Drug – Placebo > CM Pr (drug works) > threshold

Drug – Placebo > Benefit-Risk Pr (drug works) > threshold



Pr (drug works) > threshold

Disease Common Life-threatening Rare disease Unmet need



Pr (drug works) > threshold

Endpoints Hard Surrogate Objective Subjective



Hypothetical Examples

Pr (cure for pancreatic cancer) > 0.50

Pr (weight loss of 5kg) > 0.95

Pr (increased survival by 9 months) > 0.85

Approval

"FDA is required to exercise its scientific judgment to determine the kind and quantity of data and information an applicant is required to provide for a particular drug to meet the statutory standards."

21 C.F.R. § 314.105(c).











Mechanistic Research



PK / PD Models

 $ACR20 = logit.inv(BL + (Amplitude*time_{whs})/(et50 + time_{whs}), upper = 100, lower = 0)$



Phase 2 Data

(or Phase 1 in some cases)



Robust Bayes

- Usual approach: for unknown parameter(s), θ, specify 'informative prior' θ ~ π_I(θ|η)
- A 'robust' approach (just use a prior mixture): $\boldsymbol{\theta} \sim \epsilon \cdot \pi_I(\boldsymbol{\theta}|\boldsymbol{\eta}_1) + (1-\epsilon) \cdot \pi_R(\boldsymbol{\theta}|\boldsymbol{\eta}_2)$

'Your informative prior'

'Your what-if-I'm-really-wrong prior'

• Example: $\theta \sim .85 \cdot N(.52, .1) + .15 \cdot U(.1, 2)$

Limitations

- Shrinkage of Ph 2 results
- Network meta-analysis
 - How much data to include
 - How far back to go
- Changes in patient populations, geographies, doses, duration of treatment
- Changing endpoints (actual measure and the time of measurement)

Regulatory Considerations

It's different for everyone, but ...

Reward more robust Phase 2 programs









Nature Biotechnology January, 2014

Clinical development success rates for investigational drugs

Michael Hay, David W Thomas, John L Craighead, Celia Economides & Jesse Rosenthal

The most comprehensive survey of clinical success rates across the drug industry to date shows productivity may be even lower than previous estimates.

Table 4 Pha	se succ	ess and L	OA by d	rug clas	S											
		Phase 1 to	phase 2		Phase 2 to phase 3					Phase 3 to	NDA/BLA to approval					
	Total In phase ^a	Advanced or suspended ^b	Phase success ^c	Phase LOA ^d	Total in phase ^a	Advanced or sus- pended ^b	Phase success ^c	Phase LOA ^d	Total In phase ^a	Advanced or sus- pended ^b	Phase success ^c	Phase LOA ^d	Total in phase ^a	Advanced or sus- pended ^b	Phase success ^c	Phase LOA ^d
FDA classification	•															
All indications	2,541	1,918	64.5%	10.4%	3,743	2,268	32.4%	16.2%	1,554	975	60.1%	50.0%	908	659	83.2%	83.2%
NMEs	1,585	1,218	64.2%	7.5%	2,375	1,470	28.6%	11.6%	831	515	53.2%	40.7%	425	293	76.5%	76.5%
Biologics	572	411	68.4%	14.6%	819	464	37.9%	21.3%	320	182	63.2%	56.1%	159	116	88.8%	88.8%
Non-NMEs	218	168	66.7%	20.0%	355	226	45.1%	29.9%	321	234	75.6%	66.3%	293	227	87.7%	87.7%
Lead indications	1,770	1,336	66.5%	15.3%	2,070	1,247	39.5%	23.1%	1,009	633	67.6%	58.4%	664	472	86.4%	86.4%
NMEs	1094	848	65.2%	12.0%	1,275	791	36.4%	18.3%	497	300	61.7%	50.3%	283	185	81.6%	81.6%
Biologics	362	257	75.1%	20.8%	403	216	44.0%	27.7%	182	106	71.7%	63.1%	106	75	88.0%	88.0%
Non-NMEs	167	124	66.9%	23.2%	232	153	49.0%	34.6%	254	186	79.0%	70.7%	246	189	89.4%	89.4%
Biomedtracker pro	duct categ	gory ^f														
Small molecule NMEs	1,335	1,033	65.4%	7.6%	2,053	1,283	29.0%	11.6%	725	449	52.3%	39.8%	369	264	76.1%	76.1%
Large molecules	912	658	65.8%	13.2%	1,279	714	37.7%	20.1%	511	296	60.1%	53.3%	244	166	88.6%	88.6%
mAbs	329	234	70.1%	14.1%	458	268	38.1%	20.1%	147	84	60.7%	52.7%	65	53	86.8%	86.8%
non-mAb proteins	192	151	58.9%	13.1%	280	170	35.3%	22.3%	150	87	69.0%	63.1%	93	59	91.5%	91.5%
Vaccines	121	57	67.1%	14.9%	160	79	44.3%	22.2%	67	34	50.0%	50.0%	23	20	100.0%	100.0%
		here a second														

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All Indications	4		×	(e	Хс.			3			S		0	<u> </u>		98
Other!	254	198	72.2%	18.2%	419	251	44.2%	25.3%	252	159	71.1%	57.1%	169	112	80.4%	80.4%
Infectious disease	247	196	65.8%	16.7%	288	157	45.9%	25.4%	159	98	65.3%	55.4%	115	86	84.9%	84.9%
Autoimmune	241	178	68.0%	12.7%	350	215	34.0%	18.7%	149	95	68.4%	55.0%	88	61	80.3%	80.3%
Endocrine	223	180	58.3%	11.6%	293	198	33.8%	19.8%	147	95	67.4%	58.5%	91	61	86.9%	86.9%
Respiratory	110	90	66.7%	11.1%	193	120	27.5%	16.7%	58	30	63.3%	60.8%	33	25	96.0%	96.0%
Neurology	389	298	62.4%	9.4%	520	348	30.2%	15.0%	285	188	60.6%	49.9%	192	152	82.2%	82.2%
Cardiovascular	158	127	60.6%	7.1%	229	152	26.3%	11.7%	121	89	52.8%	44.6%	78	58	84.5%	84.5%
Oncology	919	651	63.9%	6.7%	1,451	827	28.3%	10.5%	383	221	45.2%	37.0%	142	104	81.7%	81.7%
Total	2,541	1,918	64.5%	10.4%	3,743	2,268	32.4%	16.2%	1,554	975	60.1%	50.0%	908	659	83.2%	83.2%
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Other	193	146	75.3%	24.5%	273	157	50.3%	32.5%	174	115	74.8%	64.6%	122	81	86.4%	86.4%
Infectious disease	228	181	66.9%	19.3%	248	135	45.9%	28.8%	127	76	69.7%	62.8%	94	70	90.0%	90.0%
Respiratory	79	66	63.6%	16.3%	120	76	31.6%	25.6%	40	20	85.0%	81.0%	29	21	95.2%	95.2%
Autoimmune	165	127	67.7%	15.4%	178	102	37.3%	22.8%	77	52	80.8%	61.1%	56	37	75.7%	75.7%
Endocrine	188	152	61.2%	14.5%	226	155	38.1%	23.8%	122	78	69.2%	62.4%	78	51	90.2%	90.2%
Oncology	489	334	68.9%	13.2%	527	298	42.3%	19.1%	193	106	54.7%	45.3%	85	58	82.8%	82.8%
Neurology	301	228	62.7%	12.3%	339	218	34.4%	19.6%	191	124	66.9%	56.8%	137	106	84.9%	84.9%
Cardiovascular	127	102	62.7%	8.7%	159	106	27.4%	13.8%	85	62	56.5%	50,6%	63	48	89.6%	89.6%
Total	1.770	1.336	66.5%	15.3%	2.070	1.247	39.5%	23.1%	1.009	633	67.6%	58.4%	664	472	86.4%	86.4%

Categories are listed from highest to lower LOA from phase. If or all indications tead and nonhead. "Humber of indications identified. "Folder number of transitions used to calculate the success rate, the a value noted in the text. The difference between 'Total in phase' and 'Advanced or suspended' is the number of indications that remain in development. "Probability of successfully advancing to the next phase." Probability of FDA approval for drug in this phase of development. "Enclosed allorg, partnetoriding, domatology, domatology, domatology."

BEGIN





Regulatory Input or Not?

How many studies?

Reproducibility

Interim Analysis



See Brad Carlin's presentation

From Comments on ASA Statement on p-values

(1) What does the data say?

- P-values attempt to answer Q1, but they are not the best answer.
- (2) What should I believe?
 - A likelihood function gives a richer depiction of evidence, and Bayesian methods formally answer Q2 with prior probability distribution to represent pre-data information or belief.
- (3) What should I decide?
 - Q3 requires a loss function in addition to data.

Do simulations to assess characteristics of this system

See Scott Berry's and Telba Irony's presentations

Nowhere did I say "Alpha is ..."

Making probability assessments (intuition, judgments) more explicit/quantifiable

Summary ICH-E9 Pre-specification

• Bring objectivity, good science

Minimize post hoc assessments

Conclusion

Where to start?

- Non-inferiority
- Pediatrics
- Anti-infectives
- Orphan drugs
- Breakthrough





See Telba Irony's presentation

Conclusion

Fundamentally change the way we do business

Clinical Drug Development with a Bayesian Lens

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