

KIELO RESEARCH

Background

Use of Patient Experience Data (PED) in Clinical Trials

Different **qualitative and quantitative methods in clinical trials** are used not only to assess disease progression within the clinical trial but also to gain deeper insights into patient perspectives on treatment benefits and harms.

- This information can be used to:
- inform clinical trial design
- the development of clinical outcome assessments
- o and ultimately, regulatory decision-making



So far...

- Byron published PPI influencing endpoint choices in a Phase 2 trial.
- o Value: ensuring inclusion of patient-relevant endpoints from early stages in the drug development.
- Michael questioned whether (de-novo) PP studies are always needed
- Value: identified diseases (and health attributes within each disease) with extensive published PP
- Divya assessed the generalizability of estimates obtained in PP studies
- o Value: evidence suggesting that PP conclusions from one study to be generalised to a broader population
- Now...Where and How do PP studies directly fit with Clinical Trials?





Patient-Focused Drug Development: Methods to Identify What Is Important to Patients

Guidance for Industry, Food and Drug Administration Staff, and Other

Stakeholders

Administering survey instruments in a clinical trial at screening and/or exit visits (e.g., occurs at or after the end-of-treatment visit or last clinic visit) may add greater depth to understanding the burden of disease or condition, treatment, and trial participation, as well as provide more detail on patients' perspectives on treatment benefits and harms, which may help inform drug development (e.g., future clinical trial design) and COA development (see Appendix 5). 16

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)

> February 2022 Procedural



Rationale



Contains Nonbinding Recommendations

Draft - Not for Implementation

Incorporating Voluntary Patient Preference Information over the Total Product Life Cycle

Draft Guidance for Industry, Food and Drug Administration Staff, and Other Interested Parties

DRAFT GUIDANCE

This draft guidance document is being distributed for comment purposes only.

Document issued on September 6, 2024

You should submit comments and suggestions regarding this draft document within 60 days of publication in the Federal Register of the notice announcing the availability of the draft guidance. Submit electronic comments to https://www.regulations.gov. Submit written comments to the Dockets Management Staff, Food and Drug Administration, 5630 Fishers Lane, Room 1061, (HFA-305), Rockville, MD 20852-1740. Identify all comments with the docket number listed in the notice of availability that publishes in the Federal Register.

For questions about this document regarding CDRH-regulated devices, email cdrh-ppi@fda.hhs.gov. For questions about this document regarding CBER-regulated devices, contact the Office of Communication, Outreach, and Development (OCOD) at 1-800-835-4709 or 240-402-8010, or by email at cod@fda.hhs.gov.

When final, this guidance will supersede "Patient Preference Information – Voluntary Submission, Review in Premarket Approval Applications, Humanitarian Device Exemption Applications, and De Novo Requests, and Inclusion in Decision Summaries and Device Labeling," issued August 2016.

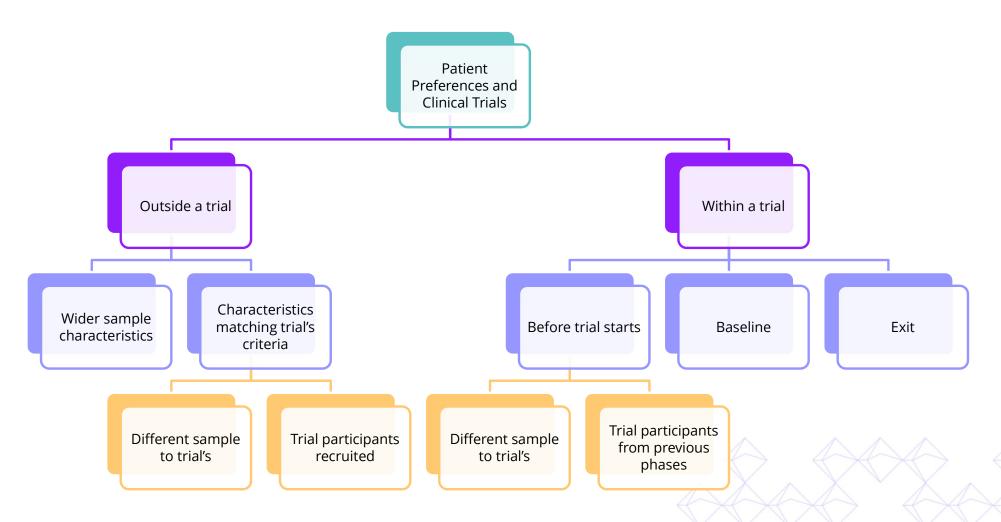


U.S. Department of Health and Human Services Food and Drug Administration Center for Devices and Radiological Health Center for Biologics Evaluation and Research Describes how, by incorporating patient preferences, researchers can inform the clinically meaningful value of their endpoints.



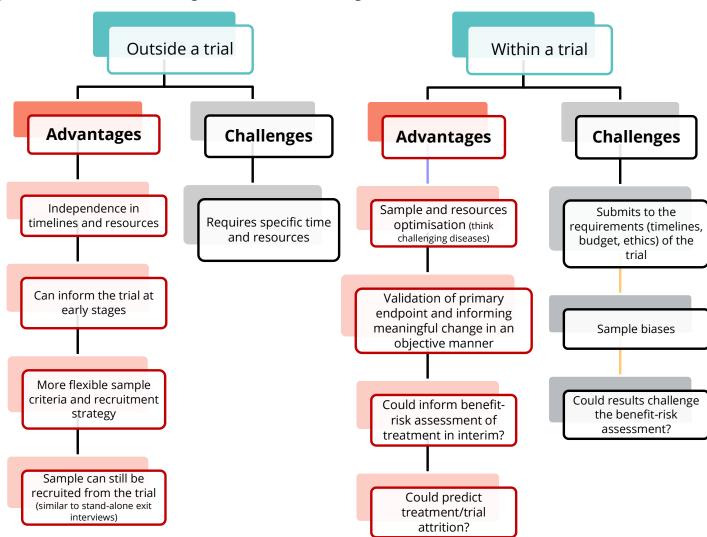


When and How can patient preferences be implemented to complement clinical trials?





What are the perceived advantages and challenges?







Case study 1



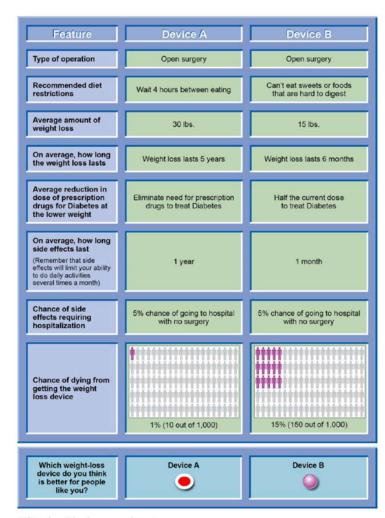
- **Objective:** quantify the relative importance of safety, effectiveness, and other attributes of weightloss devices for obesity.
- Methods: a DCE (with eight attributes) was utilised.
- The sample was recruited outside a Clinical Trial but with similar eligibility criteria (e.g., BMI and willing to loose weight)
- Results: identified that for participants to accept a device with a 0.01 % mortality risk, a risk-tolerant patient will require about 10 % total body weight loss lasting 5 years.

Ho MP, Gonzalez JM, Lerner HP, Neuland CY, Whang JM, McMurry-Heath M, Hauber AB, Irony T. Incorporating patient-preference evidence into regulatory decision making. Surg Endosc. 2015 Oct;29(10):2984-93. doi: 10.1007/s00464-014-4044-2. Epub 2015 Jan 1. PMID: 25552232.

Case study 1

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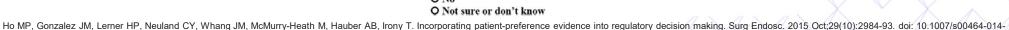
Example of the trade-off questions



[If Device A is chosen as shown]

Would you get Device A if it was available?

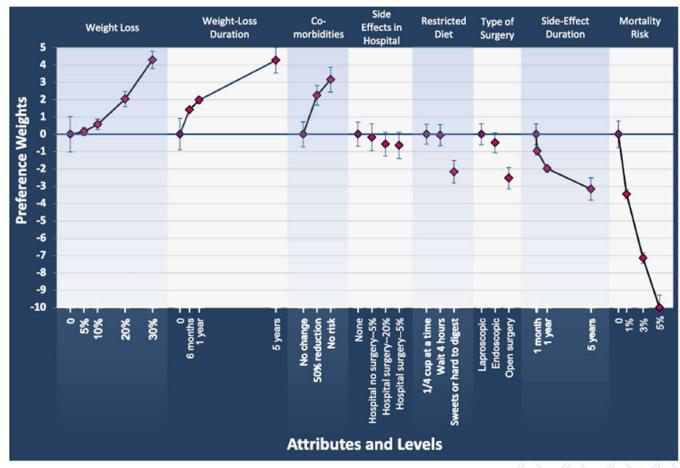
- O Yes
- O No







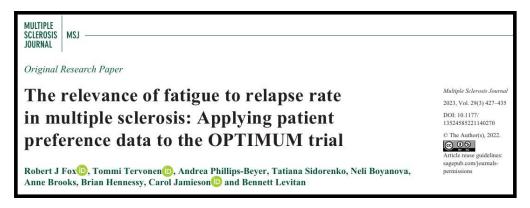
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Caste study 2



- Objective: to understand the clinical relevance of the difference in fatigue scores between ponesimod and teriflunomide in the OPTIMUM (phase III) trial.
- **Method:** combining data from OPTIMUM and a DCE study to determine the number of relapses per year and the change in time to MS progression that patients regarded as equal in importance to the treatment difference in fatigue observed in OPTIMUM.
- Sample recruited independent of the trial and characteristics represented a slightly more severe cohort
- Results:



Caste study 2

Cont...

DCE fatigue levels

Step 1: Estimate the within-DCE maximum acceptable annual relapse and maximum acceptable time to MS progression relationships

Step 2: Map the DCE levels to the FSIQ-RMS-S scale

Step 3: Calculate change in FSIQ-RMS-S as a proportion of the difference between

levels

Estimate the maximum acceptable annual relapse or maximum acceptable time to MS progression value that

gives the same change in FSIQ-RMS-S

Step 4:

Extreme difficulty

1. Quite a bit of difficulty

2. Moderate difficulty

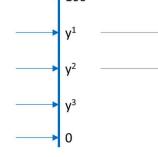
100

I z change in FSQ-RMS-S

 $x^1 \times z / (y^1 - y^2)$

3. A little difficulty

4. No difficulty



as a proportion of the change in fatigue between DCE levels 1 and 2: $z / (y^1 - y^2)$

Normalized FSIQ-RMS-S scale

Full range of fatigue levels

x¹, x², and x³ represent the maximum acceptable annual relapse and maximum acceptable time to MS progression values for changes in levels of fatigue (physical or cognitive) within the DCE. For example, x¹ represents the maximum acceptable annual relapse or maximum acceptable time to MS progression value for a change from "Quite a bit of difficulty" to "Moderate difficulty", and x3 represents the maximum acceptable annual relapse or maximum acceptable time to MS progression value for a change from "Quite a bit of difficulty to" "No difficulty".

The mapping estimates change yⁱ in FSQI-RMS-S score corresponding to a particular change in DCE fatigue level. The DCE fatigue levels are approximately equispaced along the FSIQ-RMS-S scale.

For change z in FSIQ-RMS-S, the corresponding proportion of the difference in fatigue levels is determined. For example, using levels 1 and 2 as anchors, the proportion is $z / (y^1 - y^2)$.

The change in maximum acceptable annual relapses or maximum acceptable time to MS progression that is equally as important as change z in FSIQ-RMS-S is estimated. For example, using levels 1 and 2 as anchors, the maximum acceptable annual relapse and maximum acceptable time to MS progression values are $x^1 \times z / (y^1 - y^2)$.



Caste study 2 Cont...

Table 3. Maximum acceptable increase in annual relapses and maximum acceptable decrease in time to MS progression for a 3.57-point improvement in FSIQ-RMS-S score.

Corresponding	Maximum acceptable increase in annual relapses (95% CI)		Maximum acceptable decrease in time to MS progression in years (95% CI)	
FSIQ-RMS-S score	Physical fatigue	Cognitive fatigue	Physical fatigue	Cognitive fatigue
25	0.06 (0.02– 0.10)	0.09 (0.05– 0.13)	0.17 (0.05–0.28)	0.24 (0.13–0.35)
50	0.06 (0.03– 0.09)	0.10 (0.07– 0.13)	0.15 (0.07–0.23)	0.28 (0.19–0.36)
75	0.21 (0.18– 0.25)	0.15 (0.12– 0.18)	0.57 (0.48–0.66)	0.40 (0.32–0.49)
-	0.12 (0.10– 0.13)	0.12 (0.10– 0.13)	0.32 (0.28–0.36)	0.32 (0.27–0.36)
	FSIQ-RMS-S score 25 50	Corresponding FSIQ-RMS-S score Physical fatigue 25	Corresponding FSIQ-RMS-S score Physical fatigue 25 0.06 (0.02- 0.09 (0.05- 0.10) 0.13) 50 0.06 (0.03- 0.10 (0.07- 0.09) 0.13) 75 0.21 (0.18- 0.15 (0.12- 0.25) 0.18) - 0.12 (0.10- 0.12 (0.10-	Corresponding FSIQ-RMS-S score Physical fatigue Cognitive fatigue 0.06 (0.02- 0.09 (0.05- 0.10) 0.13) 0.06 (0.03- 0.10) 0.13) 0.06 (0.03- 0.10 (0.07- 0.09) 0.13) 0.09 0.13) 0.15 (0.07-0.23) 0.21 (0.18- 0.15 (0.12- 0.57 (0.48-0.66)) 0.12 (0.10- 0.12 (0.10- 0.32 (0.28-0.36))

CI: confidence interval; FSIQ-RMS-S: Fatigue Symptoms and Impacts Questionnaire—Relapsing Multiple Sclerosis, symptom domain; SD: standard deviation.



Caste study 3



- Objective: to determine whether, relative to placebo, the benefits of daridorexant 25 mg and 50 mg outweigh their risks from the patient's perspective.
- **Methods:** data from an optional DCE administered to a subset of subjects recruited from Germany and the US who participated in the two phase 3 clinical trials of *daridorexant* (insomnia Tx).
- **Results:** both daridorexant 25 mg and daridorexant 50 mg had a significantly higher net benefit than placebo (both p < 0.001)

Caste study 3 Cont...

As in the practice question, your doctor asks you to decide between two treatments for your sleeping problems, treatment A and treatment B. The outcomes you will experience after taking either treatment A or treatment B are described in the table below.

Take a moment to review the outcomes produced by each treatment, and then indicate which treatment you would choose at the bottom of the table.

To see the description of each outcome, hover your mouse over the name of the outcome in the left column.

Outcomes	Treatment A	Treatment B	
Time it takes to fall asleep	00:30	00:45	
	30 minutes to fall asleep	45 minutes to fall asleep	
Total time asleep	05:00	07:00	
	5 hours	7 hours	
Daytime functioning	Í	9.	
	Restricted functioning	Difficulty functioning	
Likelihood of next morning dizziness/ grogginess	***		
	20 out of 100 patients (20%)	10 out of 100 patients (10%)	
Likelihood of abnormal thoughts and behavioural changes			
	6 out of 100 patients (6%)	12 out of 100 patients (12%)	
Likelihood of falls in the night			
	5 out of 100 patients (5%)	0 out of 100 patients (0%)	
Treatment withdrawal		, and the second	
	Moderate withdrawal	Severe withdrawal	
Choice:	0	0	





Caste study 3

Cont...

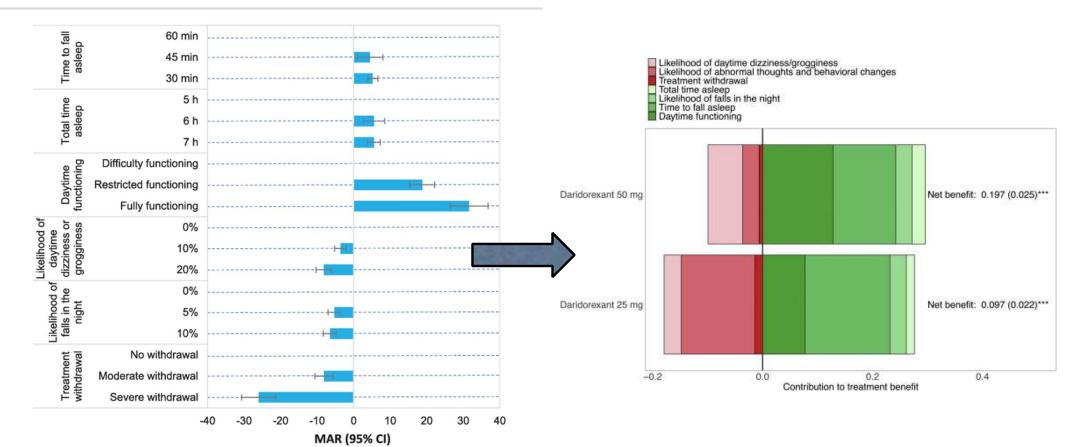
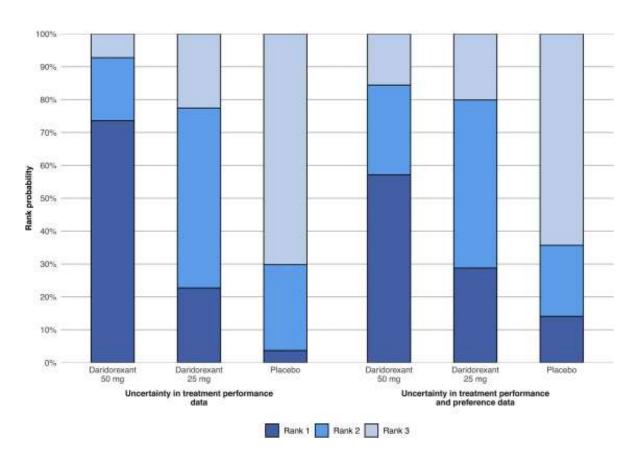


Figure 4. MAR of abnormal thoughts and behavioral changes. MAR normalizes the impact of changes in attributes on preferences using risk equivalences as a common and comparable unit of measurement. CI, confidence interval; MAR, maximum acceptable risk of abnormal thoughts and behavioral changes.



Caste study 3 Cont...



Conclusions and Next Steps

- 1. There has been proven value from Patient Preferences information informing decision-making related to clinical trials
- 2. Patient Preferences information can complement Clinical Trial findings but it seems to be more efficient and accurate when considered in advance
- 3. Further research is required to establish advantages that surpass the challenges and ultimately provide best practices for Patient Preferences studies designed for/with Clinical Trials

Research collaborators are members from the PREFER EN: Byron Jones¹, Michael Bui², Janine van Til², Karin Oudshoorn², Jorien Veldwijk³, Barry Liden ⁴, Conny Berlin¹

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