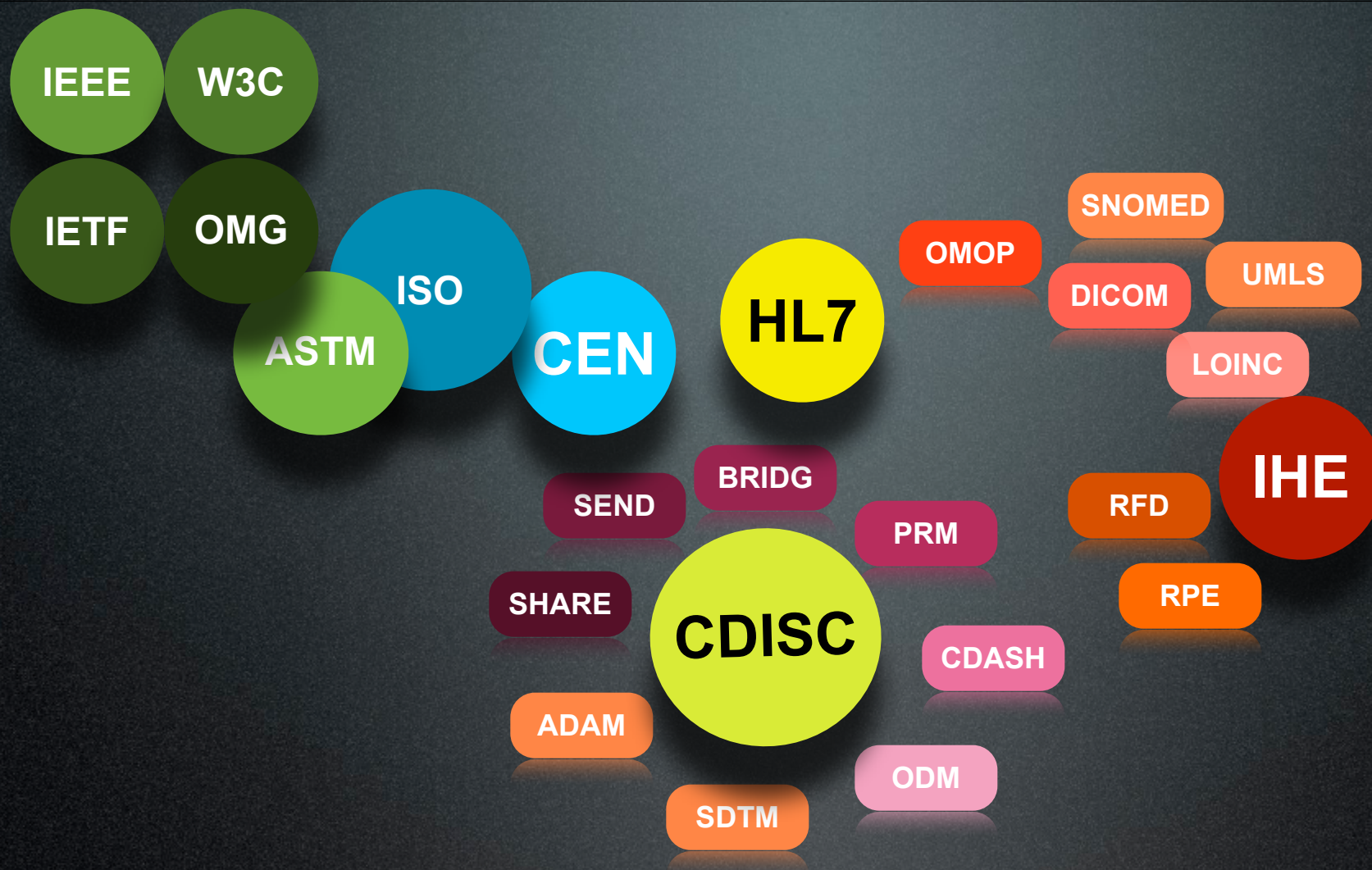


# Impact of Data Standards on FDA Regulatory Decisions and Policies

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Presented at:  
Phuse SDE 2013  
CDISC Programming  
Mumbai, India



# The Data Standards Landscape

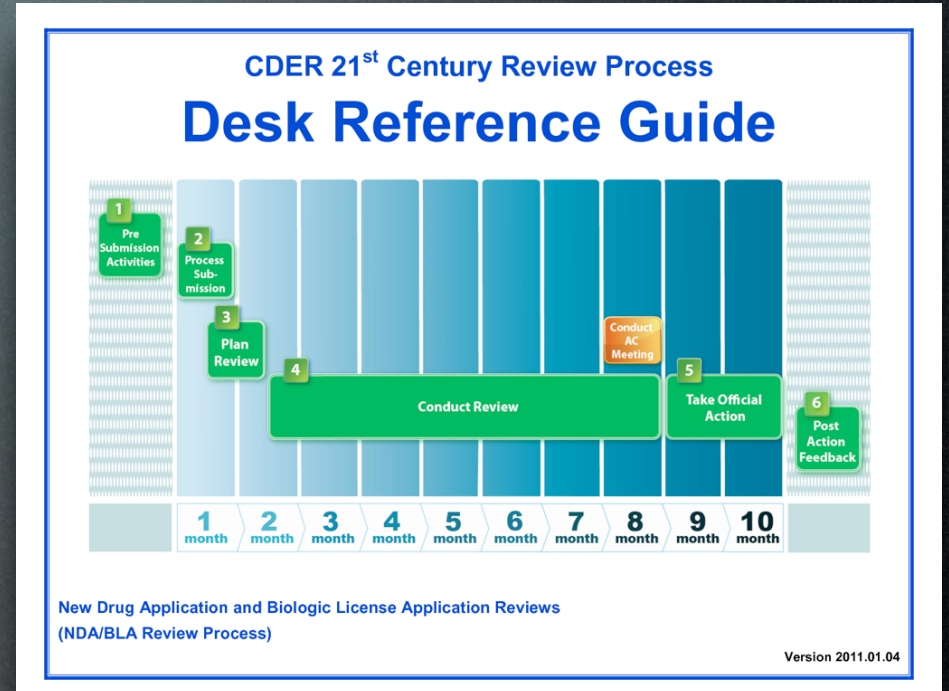
# Why Standards?

Impact of Interoperability





From PAPER to E-Submission



The logistical side of protecting the public health

# Life of a Reviewer

# Impact of Interoperability

Efficiency

Predictability

Reliability

Scalability

Complexity

Is there more to standards?





# Regulatory Decisions and Policies

# Take home

- Standards have **improved quality** of anti-Hepatitis C Virus (HCV) NDA review decisions
- Standards have impacted **policies** to keep up with **rapid changes** in HCV landscape

# 2008: Can we handle the onslaught of HCV INDs and NDAs?

- With our FTEs (2) for Anti-viral portfolio , it was clearly impossible
  - \* Can we automate certain tasks?
  - \* Can we get pharma industry to do certain tasks?
  - \* How can we learn from success and failures?



One minor  
problem

We didn't know  
systems, we didn't  
know standards



## Antiviral Information Management System (AIMS)

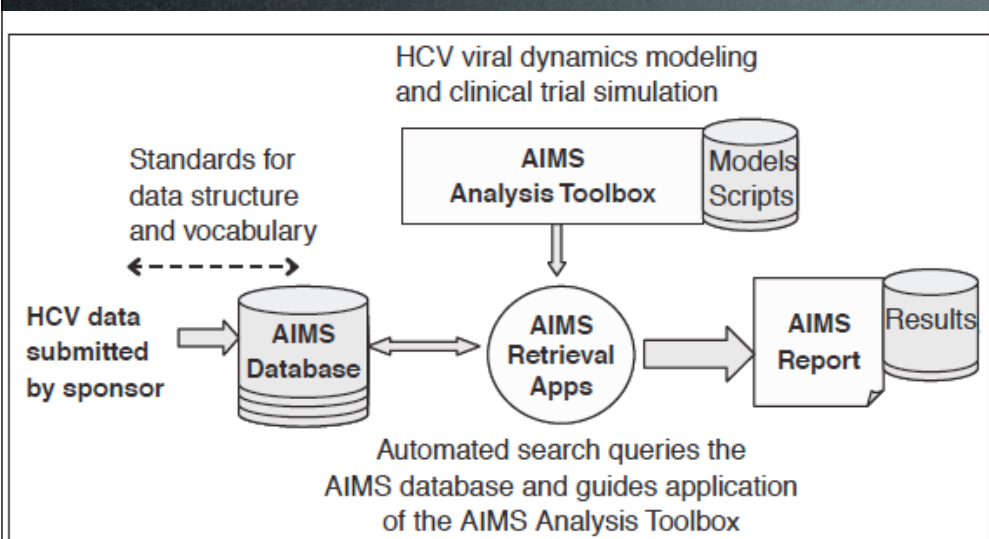
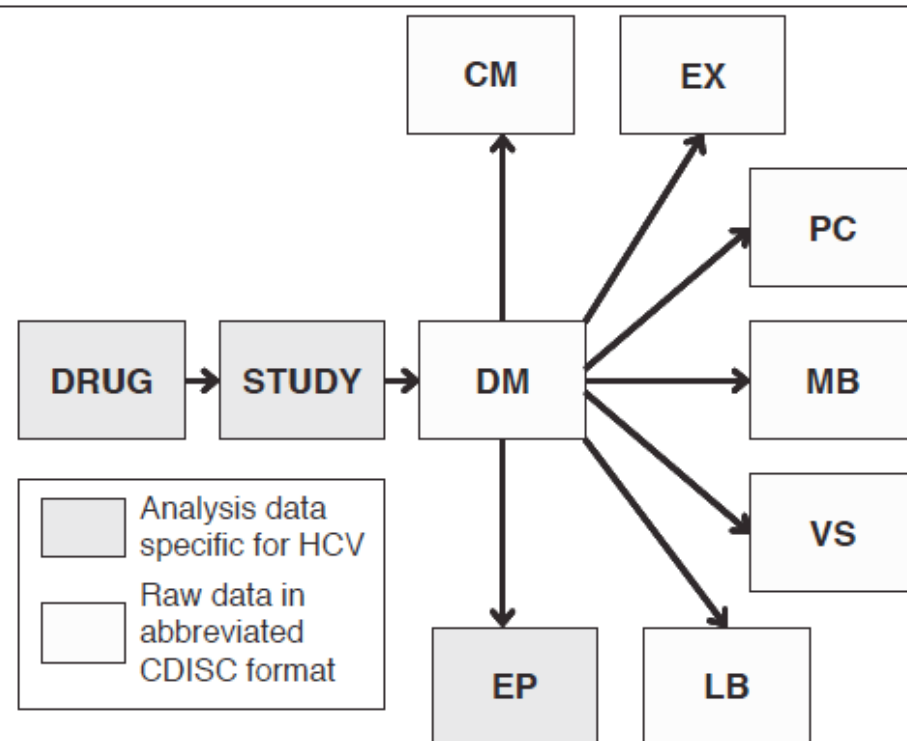


Figure 2. AIMS workflow.



## Antiviral Information Management System (AIMS): A Prototype for **Operational Innovation** in Drug Development

Pravin R. Jadhav, PhD, FCP, Lauren Neal, PhD, Jeff Florian, PhD, Ying Chen, PhD, Lisa Naeger, PhD, Sarah Robertson, PharmD, Guoxing Soon, PhD, and Debra Birnkrant, MD

Journal of Clinical Pharmacology, 2010;50:50S-55S

**2010:** Developed and Published the Workflow and Standards

2011: Two new therapies were  
landmark developments



AIMS meaningfully contributed to  
regulatory decisions

# 2012: Three Publications in Major Clinical Journals

**Interferon responsiveness does not change in treatment-experienced hepatitis C subjects: implications for drug development and clinical decisions.**

Liu J, Florian J, Birnkrant D, Murray J, Jadhav PR.

Clin Infect Dis. 2012 Sep;55(5):639-44.

**Boceprevir dosing for late responders and null responders: the role of bridging data between treatment-naïve and -experienced subjects.**

Florian J, Jadhav PR, Amur S, Ayala R, Harrington P, Mishra P, O'Rear J, Pacanowski M, Robertson S, Singer M, Soon G, Zeng W, Murray J.

Hepatology. 2013 Mar;57(3):903-7

**Response-guided telaprevir therapy in prior relapsers? The role of bridging data from treatment-naïve and experienced subjects.**

Liu J, Jadhav PR, Amur S, Fleischer R, Hammerstrom T, Lewis L, Naeger L, O'Rear J, Pacanowski M, Robertson S, Seo S, Soon G, Birnkrant D.

Hepatology. 2013 Mar;57(3):897-902

# 2011: Data Mining, Regulatory Decisions and Public Health

**Avoided the need for  
at least TWO NEW  
clinical studies**

**Estimated Sample Size for  
each New Study: 100  
patients studied over 72  
weeks**

**Streamlined Approval  
and Dosing  
Instructions**

**Impact on Healthcare Cost by  
streamlining dosing: 12  
weeks of less therapy that  
costs \$1100/week**

# 2013: Impact of Standards on Regulatory Policies

**Can we change the regulatory endpoint for HCV drug approvals?**

**Technical Question: What is the concordance between SVR12 and SVR24 for HCV trials?**

| Genotype  | PPV  | NPV  |
|-----------|------|------|
| I         | 98.3 | 98.8 |
| II, III   | 91.1 | 98.3 |
| Pediatric | 100  | 100  |

**Patients will be able to get**

SVR12 vs SVR24

**Early Access to Approved therapy**

**From Question to Answers**

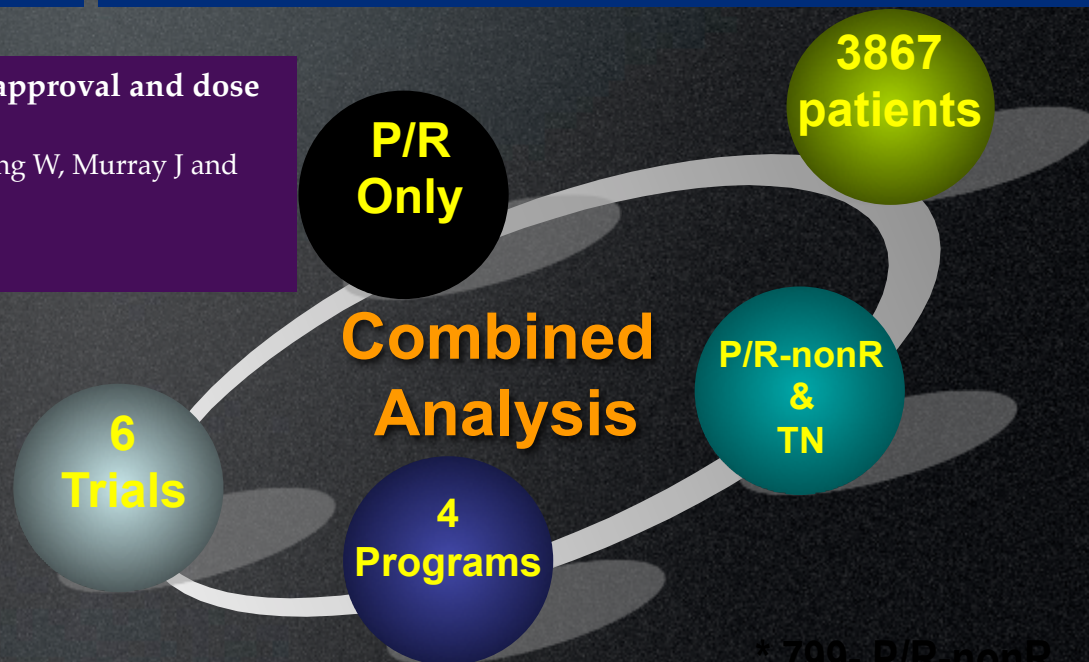
by genotype, by drugs, by dosing regimen etc

**in ONE hour**

**Earlier sustained virologic response end points for regulatory approval and dose selection of hepatitis C therapies**

Chen J, Florian J, Carter W, Fleischer RD, Hammerstrom T, Jadhav PR, Zeng W, Murray J and Birnkrant D

Gastroenterology. 2013 Jun;144(7):1450-1455.e2.



# Opportunities: Clinical Data Standards

Automation

Integration

Vision

Certification

Education

# Opportunities: Healthcare Data Standards



If we thought, clinical trial data standards  
were complex.....

# Acknowledgements

- FDA Pharmacometrics Team
- Dr. Ajay Sathe
- Dr. Nand Kishore Rawat
- Phuse organizers