

# New Approach to assessing TdP risk without the thorough QT study

Regulatory Risk, uncertainty and implications

Krishna Prasad  
MHRA



# Disclaimer

The views expressed here are the **personal reflections of the presenter** and **not necessarily of** either MHRA or EMA /CHMP, the working parties or other organisations with which the presenter is affiliated.

The references to the guidelines or papers from the above organisations, are factually represented.

# E-14 and Thorough QT study: Achievements;

- E-14 ( & S7B)
  - provided a framework for evaluation of QT liability
  - Defined expectations (for sponsors)
  - Effectively reduced accidental discovery of QT liability of drugs
- Thorough QT study
  - Defined a set of parameters for identifying a risk
  - Provided the regulators and sponsors a decision making tool
  - Perhaps, standardised some of the interpretation and methods of testing
- Disadvantages/ Criticisms---fact of life..

# Overall Risk & Benefit

*Drugs approved between 7/2011 to 4/2013*

<i>Drug</i>	<i>Indication</i>	<i>CV Risk</i>
Ipilimumab	Melanoma	
Everolimus	Astrocytoma	
Abiraterone	Prostate Ca	QT
Vandetanib	MTC	QT↑↑
Vemurafenib	Melanoma	? QT
6MP	ALL	
Pixantrone	Non-Hodgkin	HF (LVD)
Axitinib	RCC	QT ↑; BP ↑
Decitabine	AML (>65yrs)	
Crizotinib	ALK(+) NSCLC	QT ↑
Aflibercept	Colorectal Ca	BP ↑
Pertuzumab	Her2+ Br Ca	CHF
Bosutinib	CML-Blast phase.	BP ↑; QT ↑

- ~50% of drugs for oncology have QT liability

- the predictability of QT effect is variable ( e.g. bosutinib)

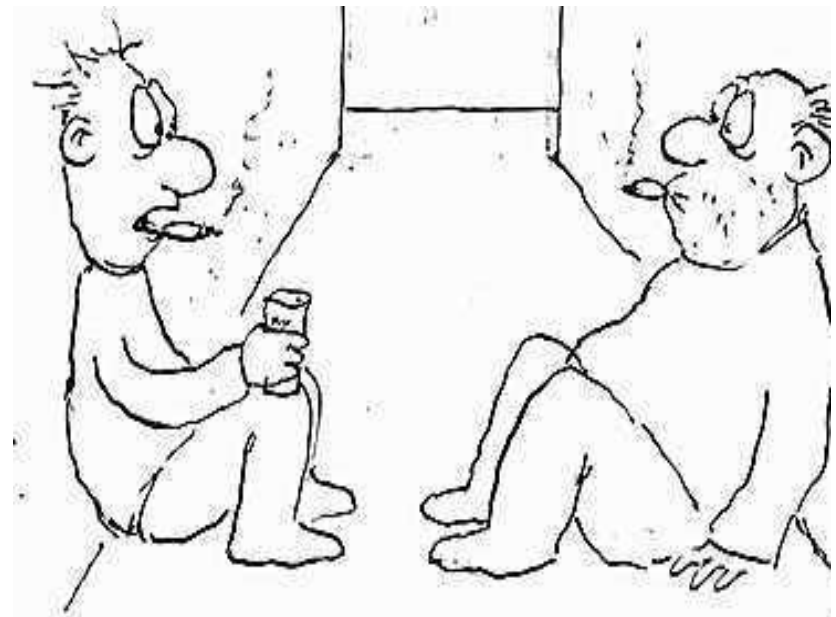
- limited QT or torsadogenic risk is an expectation.

## There is Public Expectation...



**Will regulators,  
industry, and the  
clinical community do a  
better job for patients  
next time?**

**This is a perennial question.....**



*"Drugs I can handle.  
It's reality that's lethal."*

# Pre-clinical evaluations

## hERG assay and in vivo studies ( S7B)

- Often the dossiers are non-compliant.
- hERG trafficking – little information (Eg; *Fluoxetine, Arsenic, petamidine and others*)

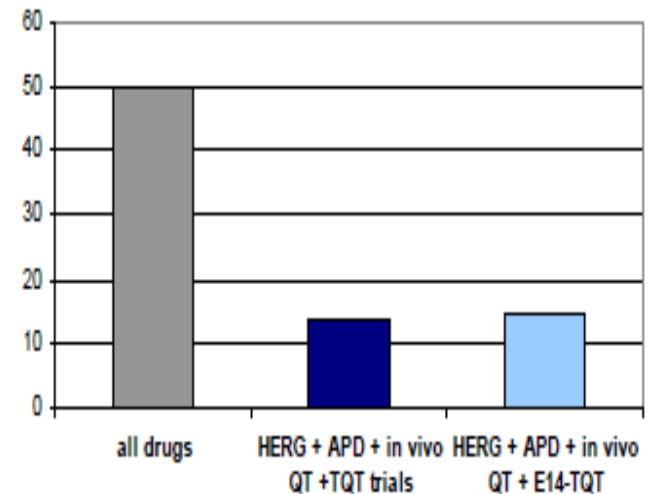
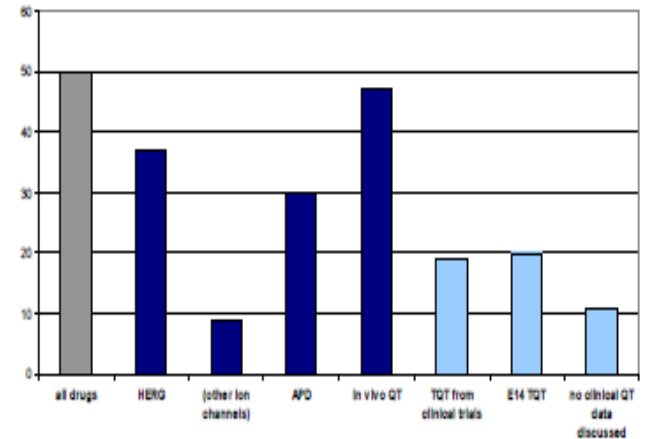
## Repolarisation assays: (APD)

- Limited information in most ( APD<sub>90</sub>)
- Evidence of EADs ?!

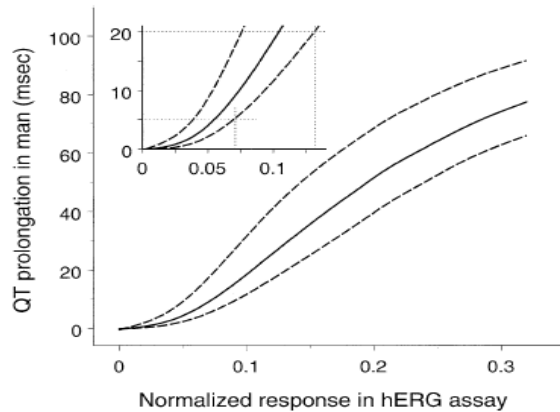
## Other indicators of proarrhythmias

- TDR (transmural dispersion)-limited information

Overall predictability is variable.



# Current paradigm: Models for prediction



*Jonker et al 2005, CPT*

Represents a model using **dofetilide** for an individual with baseline QT of 390 ms

hERG	Clinical -	Clinical +	In vivo QTc	Clinical -	Clinical +
Non-clinical -	10	3	Non-clinical -	8	2
Non-clinical +	0	10	Non-clinical +	1	10

Sensitivity = 77%  
Specificity = 100%  
Predictive capacity = 87%

Sensitivity = 83%  
Specificity = 89%  
Predictive capacity = 86%

*Valentin JP, et al 2009 BJCP*

- hERG based
- Relation to dosing and clinical doses needs clarity.
- Metabolite effects? – need better definition

# Confounders for pre-clinical data

## For in vitro studies

- Solubility and therefore concentration tested
- Adsorption to surfaces
- Test concentration limited by cytotoxic attributes
- Information on metabolites

## In Vivo studies

- Data acquisition & analysis methods- (non-standard)
- Reproducibility of the systems
- Dose, interval and measurement points
- Interspecies differences
- Distinction of Multiple channel effects-



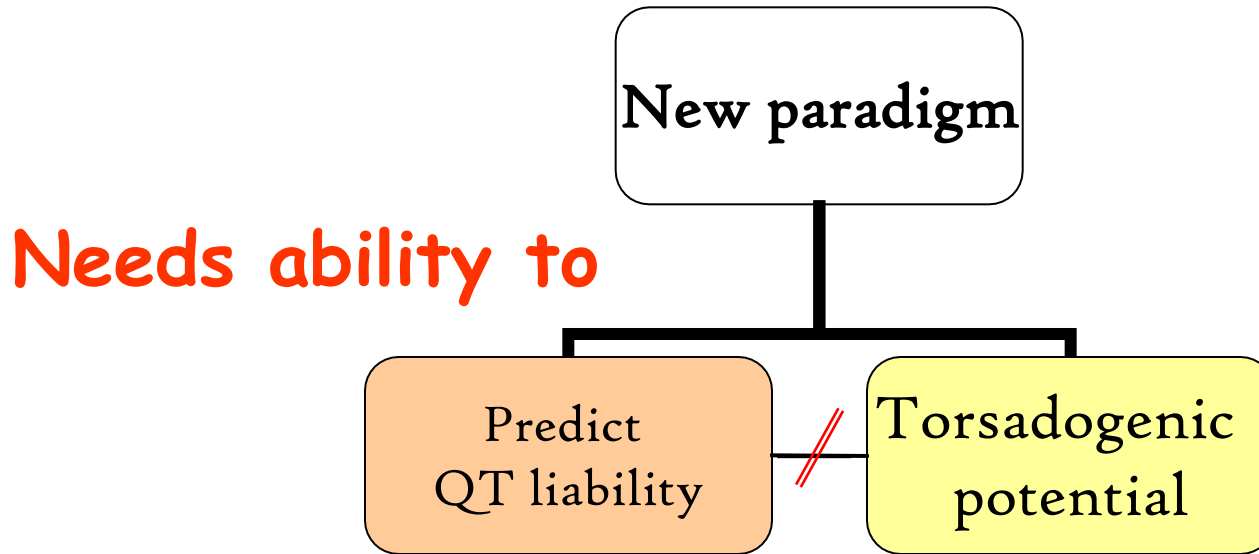
# Regulatory risk

Current paradigm for prediction.

- is a hERG centric approach sufficient??!!
- Need standards for SP study end points translation → to clinical studies
- Evidence of predictive value of SP studies not publicly available consistently.
- Prediction good for QT/QTc **but** appears dependent on **effect size**



# New Paradigm



## Will require;

Improved predictability and accuracy ( sensitivity/  
specificity)

Better relation to defining Torsade especially if  
TQT is not available

# Potentials scenarios

(Admittedly rare)

- (-) NC tests, Phase-I (+) -QT prolongation
- (+) non-clinical test ; phase I -equivocal
- inconsistent NC studies.

However,

In these cases, default position would be to opt for intense monitoring in late phases.

# What next?!

## ☛ In Silico methods

- CR data from HTS
- Medium throughput patch clamps
- Multi parametric QSAR
- AP simulation assay

## • Limitations

- *Channel specific changes*
- *Accuracy ( Sn/ Sp)*
- *Variability ( with HTS screening)*

## ☛ Stem cells;

- ☛ Human cardiac myocytes
- ☛ iPSC -CM
- ☛ iPSCs
- ☛ Undifferentiated hESC

## ☛ Limitations

- *Phenotypic consistency?*
- *Ion channel expressions*
- *Availability for HTS*
- *Discrepancy between isolated rabbit hearts & hESC-CM cells in potency.*

# Summary

## Current paradigm

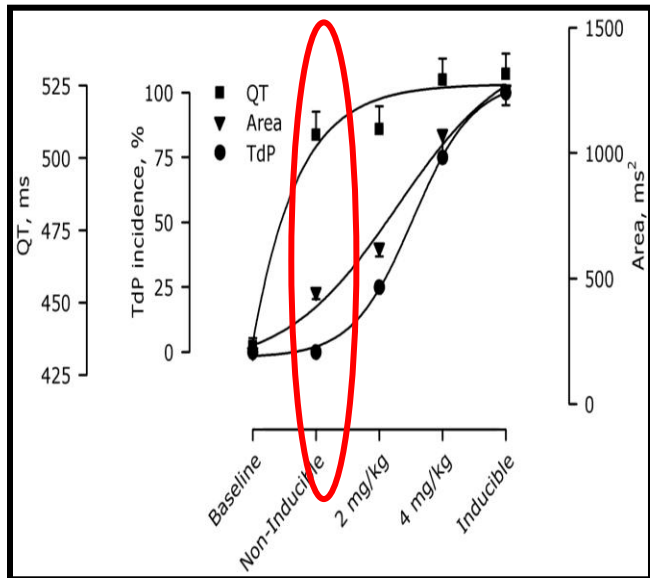
- may not be sustainable
- Preclinical tests often non-standardised, and variable.
- Predictability for QT effect but not TdP.

## A new paradigm

- or panel will need to address accuracy
- Unequivocal NC and Inconsistency with early phase studies will need to be tackled.

# Back Up slides

## Limitations of current paradigm (regulatory context)



*Thomsen et al. Circulation.*  
2004; 110:2460-2466

- CV safety evaluation is an inescapable fact
- TQTs burdensome
  - Expense--- (\$ x10<sup>5</sup>)
  - Time (delayed development programmes)
- Risk of TdP is elusive
  - QT liability defined but relation to TdP imprecise