

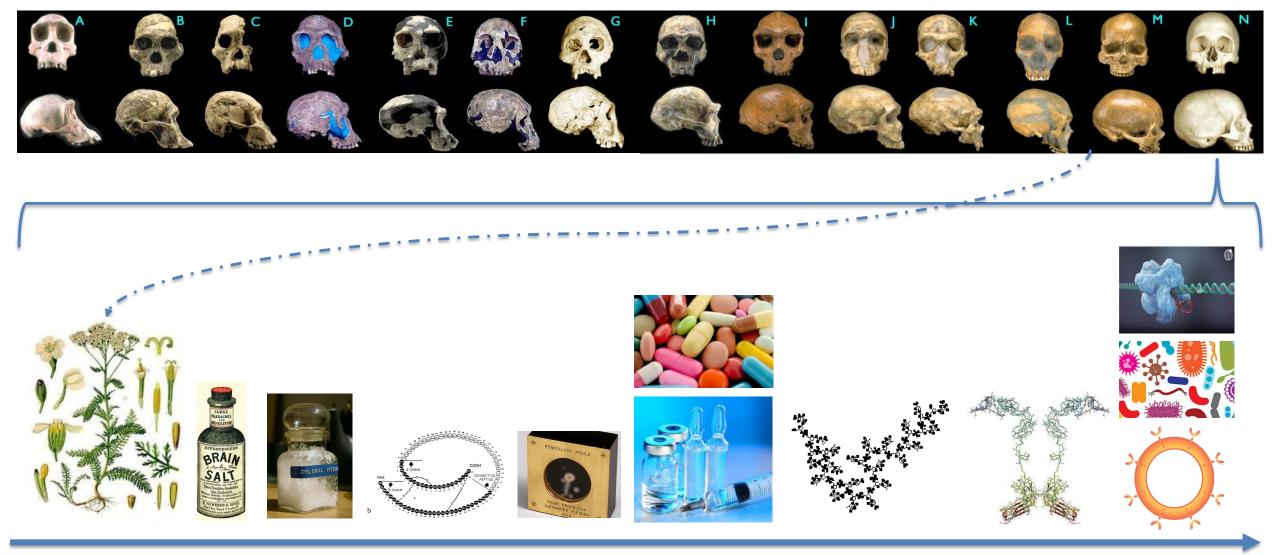
Evolution of Precision Medicines from a Regulatory Perspective

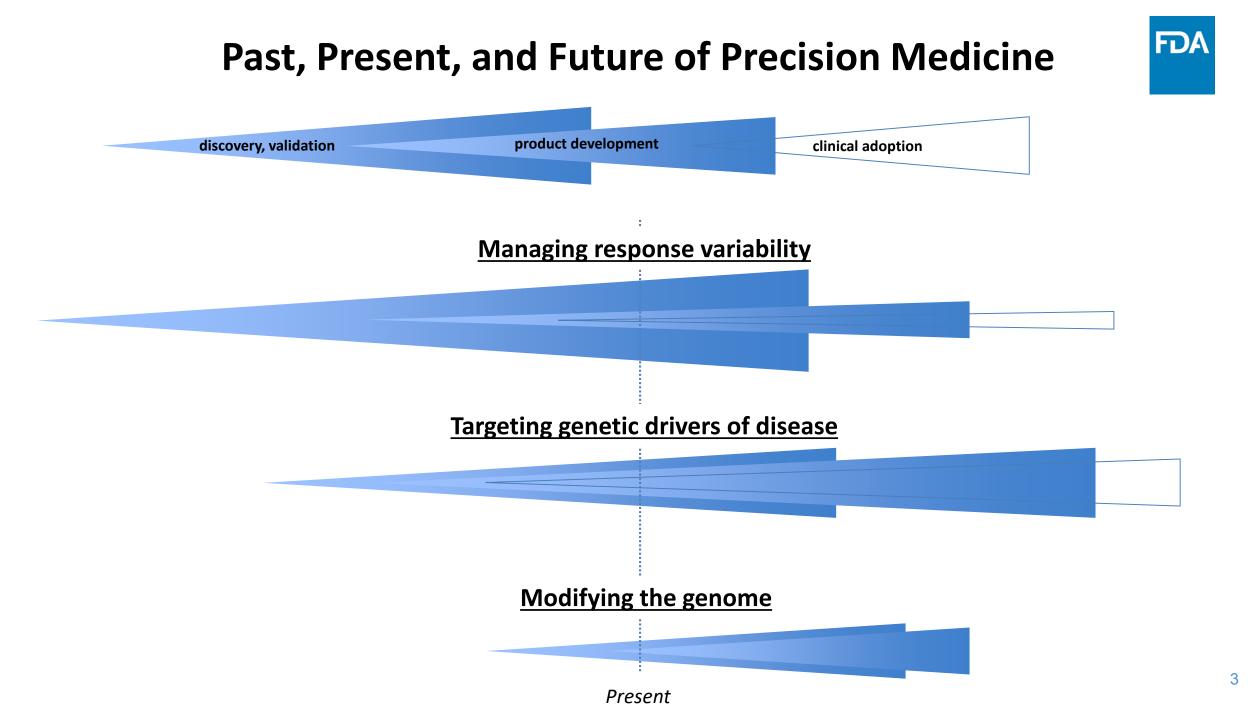
ASCPT Annual Meeting March 15, 2019

Mike Pacanowski Office of Clinical Pharmacology Center for Drug Evaluation and Research U.S. Food and Drug Administration

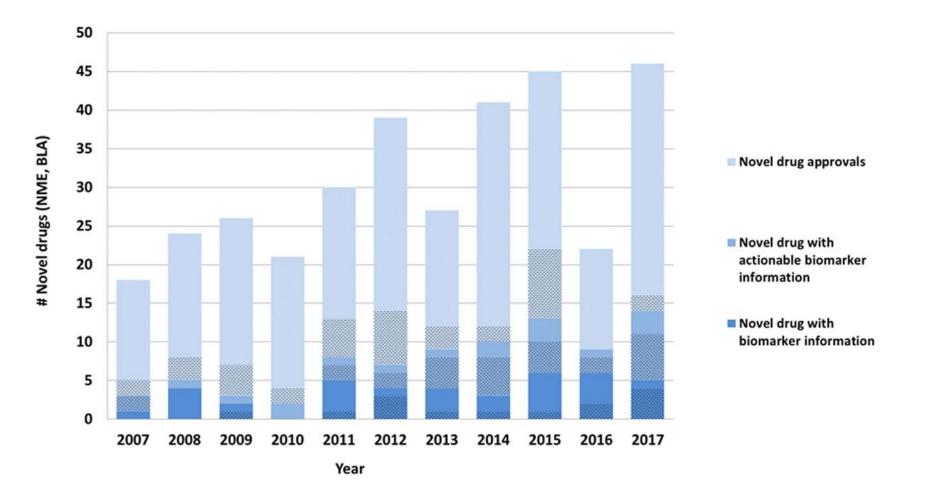
A Brief History of Medicines







Labeling for New Drugs



Actionable biomarker: labeling includes a specific prescribing recommendation that is included in one of the following label sections: 1)Boxed Warning, 2) Indications and Usage, 3) Dosage and Administration, 4) Contraindications, or 4) Warnings and Precautions. Biomarkers may be any genomic biomarker or other selected protein biomarker that are used for patient selection.

FDA

Notable CDER Approvals 2018

(Total Novel Drug N=59)



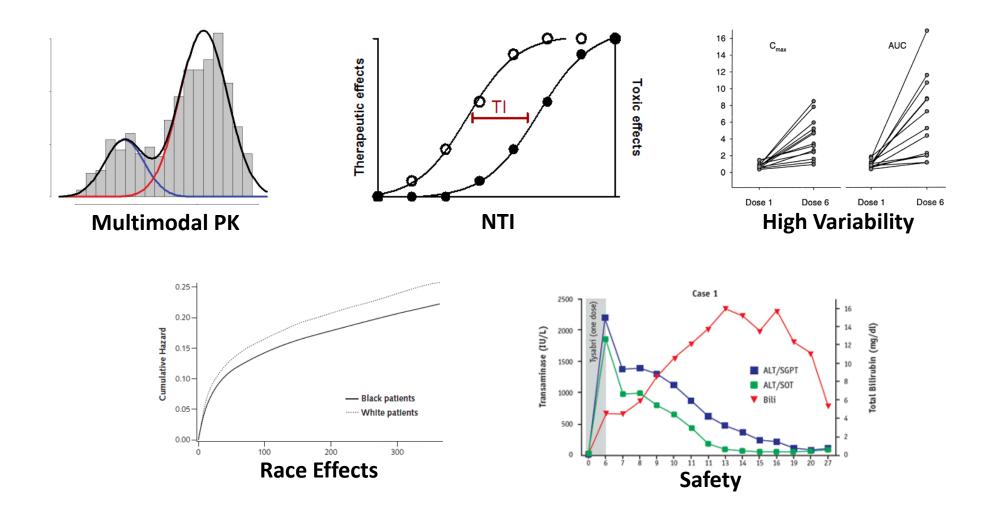
Drug	Disease or Condition	Biomarker	Use
Patisiran*, Inotersen*	Polyneuropathy of hereditary transthyretin-mediated amyloidosis	N/A	N/A
Tezacaftor* + ivacaftor	Cystic fibrosis	Responsive CFTR variant	Patient Selection
Migalastat*	Fabry disease	Amenable GLA variant	Patient Selection
Ivosidenib*	Relapsed or refractory AML	Susceptible IDH1 mutation	Patient Selection
Binimetinib*, encorafenib*	Metastatic melanoma	BRAF V600E/K mutation	Patient Selection
Dacomitinib*	Metastatic NSCLC	EGFR exon 19 deletion or L858R	Patient Selection
Larotrectinib*	Solid tumors	NTRK gene fusion	Patient Selection
Gileritinib*	Relapsed or refractory AML	FLT3 mutation	Patient Selection
Lorlatinib*	Metastatic NSCLC	ALK gene rearrangement	Patient Selection
Talazoparib*	Advanced or metastatic breast cancer	Germline BRCA mutation	Patient Selection
Afatinib	Metastatic NSCLC	Non-resistant EGFR mutation	Patient Selection
Amifampridine*	Lambert-Eaton myasthenic syndrome	NAT2 genotype	Dosing
6-MP/TG/AZA	ALL/acute nonlymphocytic leukemia	TPMT/NUDT15 genotype	Dosing
Avatrombopag*	Thrombocytopenia in adult patients with chronic liver disease who are scheduled to undergo a procedure	FVL	Warning
Lofexidene*	Opioid withdrawal symptoms	CYP2D6 genotype	Informational
Elagolix*	Severe pain associated with endometriosis	SLCO1B1 genotype	Informational

* New molecular entity

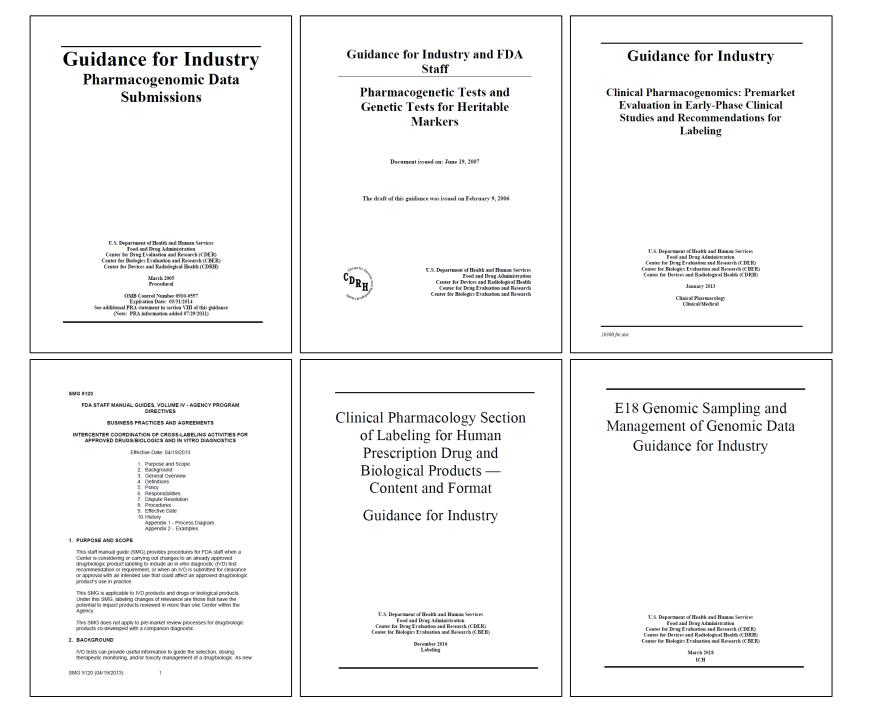


Managing Response Variability

Managing Response Variability



For more information see: Guidance for Industry - Clinical Pharmacogenomics: Premarket Evaluation in Early-Phase Clinical Studies and Recommendations for Labeling https://www.fda.gov/downloads/Drugs/GuidanceComplianceRegulatoryInformation/Guidances/UCM337169.pdf FDA



Characterizing Genetic Effects on Response Post-Approval



- Ivosidenib was approved for the treatment of relapsed or refractory AML with a ulletsusceptible IDH1 mutation
- Patients with more co-occurring mutations tended to have lower response rates

NDA 211192

Food and Drug Administration NDA APPROVAL

Silver Spring MD 20993

Agios Pharmaceuticals, Inc Attention: Jamie Cohen, PhD Director, Regulatory Affairs 88 Sidney Street Cambridge, MA 02139

Dear Dr. Cohen

Please refer to your New Drug Application (NDA) dated December 21, 2017, received December 21, 2017, and your amendments, submitted under section 505(b) of the Federal Food, Drug, and Cosmetic Act (FDCA) for Tibsovo® (ivosidenib) tablets: 250 mg

This new drug application provides for the use of Tibsovo® (ivosidenib) tablets for the treatment of adult patients with relapsed or refractory acute myeloid leukemia (AML) with a susceptible isocitrate dehydrogenase-1 (IDH1) mutation as detected by an FDA-approved test.

We have completed our review of this application, as amended. It is approved, effective on the date of this letter, for use as recommended in the enclosed agreed-upon labeling text

CONTENT OF LABELING

As soon as possible, but no later than 14 days from the date of this letter, submit the content of labeling [21 CFR 314.50(1)] in structured product labeling (SPL) format using the FDA automated drug registration and listing system (eLIST), as described at http://www.fda.gov/ForIndustry/DataStandards/StructuredProductLabeling/default.htm. Conten of labeling must be identical to the enclosed labeling (text for the prescribing information and Medication Guide). Information on submitting SPL files using eLIST may be found in the guidance for industry SPL Standard for Content of Labeling Technical Qs and As, available at http://www.fda.gov/downloads/Drugs

The SPL will be accessible via publicly available labeling repositories

DEPARTMENT OF HEALTH AND HUMAN SERVICES

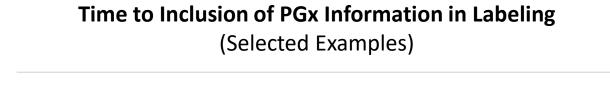
CARTON AND IMMEDIATE CONTAINER LABELS

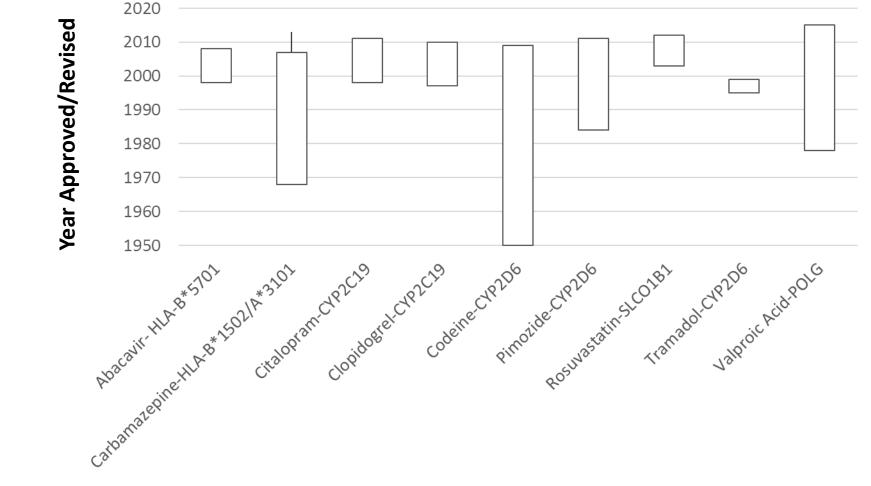
Submit final printed carton and immediate container labels that are identical to the carton and immediate container labels submitted on May 16, 2018, as soon as they are available, but no more than 30 days after they are printed. Please submit these labels electronically according to PMR 3444-1 Characterize the long-term safety of ivosidenib in patients with relapsed or refractory acute myeloid leukemia (AML). Submit the final study report and data set with 3 years of follow-up from ongoing Study AG120-C-001, A Phase 1, Multicenter, Open-Label, Dose-Escalation and Expansion, Safety, Pharmacokinetic, Pharmacodynamic, and Clinical Activity Study of Orally Administered AG-120 in Subjects with Advanced Hematologic Malignancies with an IDH1 Mutation. Include data from approximately 205 patients with relapsed or refractory AML.

> Include in the final study report the exploratory subgroup analyses and corresponding subject level data related to pre- and post-treatment cytogenetics, specific IDH1 mutations, and mutation analyses for other genes as obtained under the trial protocol.

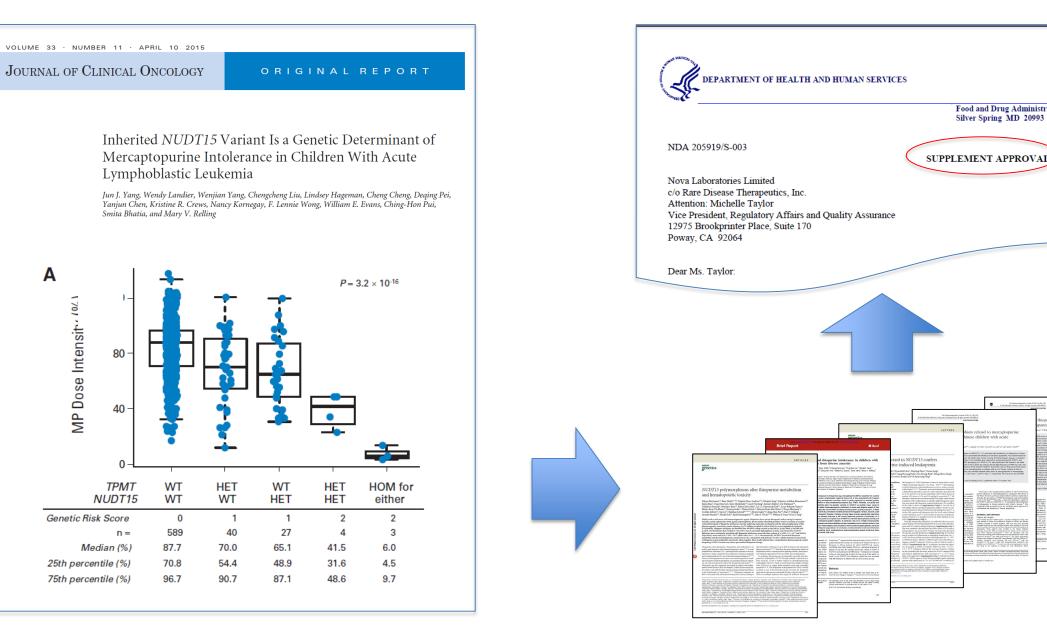
Incorporating Pharmacogenomic Markers into Prescribing Recommendations in the Post-Marketing Setting







Incremental Enhancements to Improve Benefit-Risk



FDA

Food and Drug Administration Silver Spring MD 20993

Incremental Enhancements to Improve Benefit-Risk



2.2 Dosage in Patients with TPMT and/or NUDT15 Deficiency

Consider testing for TPMT and NUDT15 deficiency in patients who experience severe bone marrow toxicities or repeated episodes of myelosuppression [see Warnings and Precautions (5.1) and Clinical Pharmacology (12.5)].

Homozygous deficiency in either TPMT or NUDT15

Patients with homozygous deficiency of either enzyme typically require 10% or less of the standard PURIXAN dosage. Reduce initial dosage in patients who are known to have homozygous TPMT or NUDT15 deficiency.

Heterozygous deficiency in TPMT and/or NUDT15

Reduce the PURIXAN dosage based on tolerability. Most patients with heterozygous TPMT or NUDT15 deficiency tolerate recommended mercaptopurine doses, but some require dose reduction based on toxicities. Patients who are heterozygous for both TPMT and NUDT15 may require more substantial dosage reductions.

5 WARNINGS AND PRECAUTIONS

5.1 Myelosuppression

The most consistent, dose-related toxicity of PURIXAN is bone marrow suppression, manifested by anemia, leukopenia, thrombocytopenia, or any combination of these. Monitor CBC and adjust the dose of PURIXAN for severe neutropenia and thrombocytopenia.

Evaluate patients with repeated severe myelosuppression for thiopurine S-methyltransferase (TPMT) or nucleotide diphosphatase (NUDT15) deficiency. TPMT genotyping or phenotyping (red blood cell TPMT activity) and NUDT15 genotyping can identify patients who have reduced activity of these enzymes. Patients with homozygous TPMT or NUDT15 deficiency require substantial dosage reductions of PURIXAN [see Dosage and Administration (2.2) and Clinical Pharmacology (12.5)].

Pharmacogenetic Testing



Goals: Reliable tests, resources to support clinical validation and interpretation of results

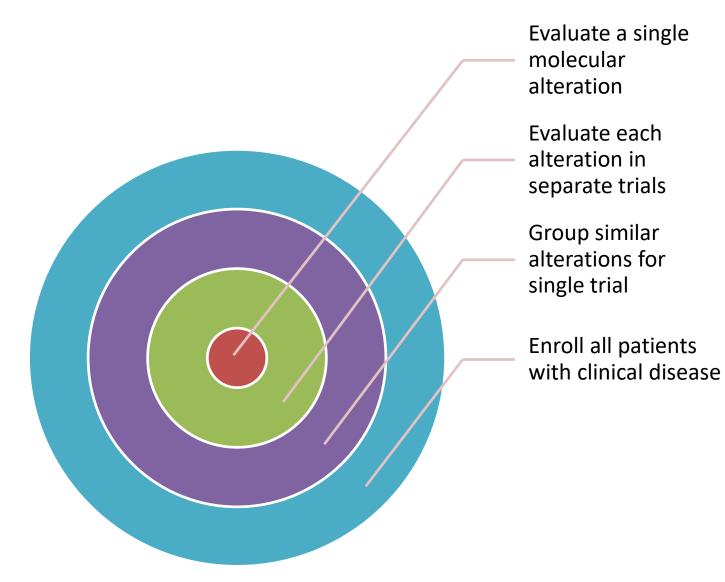
	ical Devices Radiation-Emitting Products Vaccines, Blood & Biologics Anin	nal & Veterinary Cosmetics T	Tobacco Products						
Medical Devices Home > Medical Devices > Medical	Device Safety > Safety Communications	E Home Food Dru	rugs Medical Devices Radiation-Emitting Products Vaccines, Blood & Biologics Anima	al & Veterinary Cosmetics T	Tobacco Products				
Safety Communications 2019 Safety Communications 2018 Safety Communications 2017 Safety Communications	The FDA Warns Against the up tests with Unapproved Claim Response to Specific Medical Communication Image: Image	Home > News & Events > Newsroom > Press Announcements FDA News Release FDA authorizes first direct-to-consumer test for detecting genetic variants that may be associat with medication metabolism f SHARE TWEET in LARCEON					y Cosmetics Tobacco Products Inquiries Media Stephanie Caccomo 301-348-1956 Consumers 888-INFO-FDA		
		Release	This news release was updated to reflect the correct number of special contr that were established for this category of device.	Release Release	driving the efficien person's DNA to d first time, the ager information about is recognizing the (ClinGen) consorti funded by the Nat	d Drug Administration toda t development of novel dia diagnose genetic diseases i ncy has formally recognizer genes, genetic variants an genetic variant information ium's ClinGen Expert Cural ional Institutes of Health (N	y took a significant step forv gnostic technologies that so and guide medical treatmen I a public database that con d their relationship to diseas in the Clinical Genome Res ted Human Genetic Data, w IH), as a source of valid sci validity in premarket submis	an a ts. For the tains se. The FDA source hich is entific	FDA: Recognition of Publi Human Genetic Variant Databases FDA: ClinGen Recognition Decision Summary (PDF- 481KB) ClinGendP



Genetically Targeted Therapies

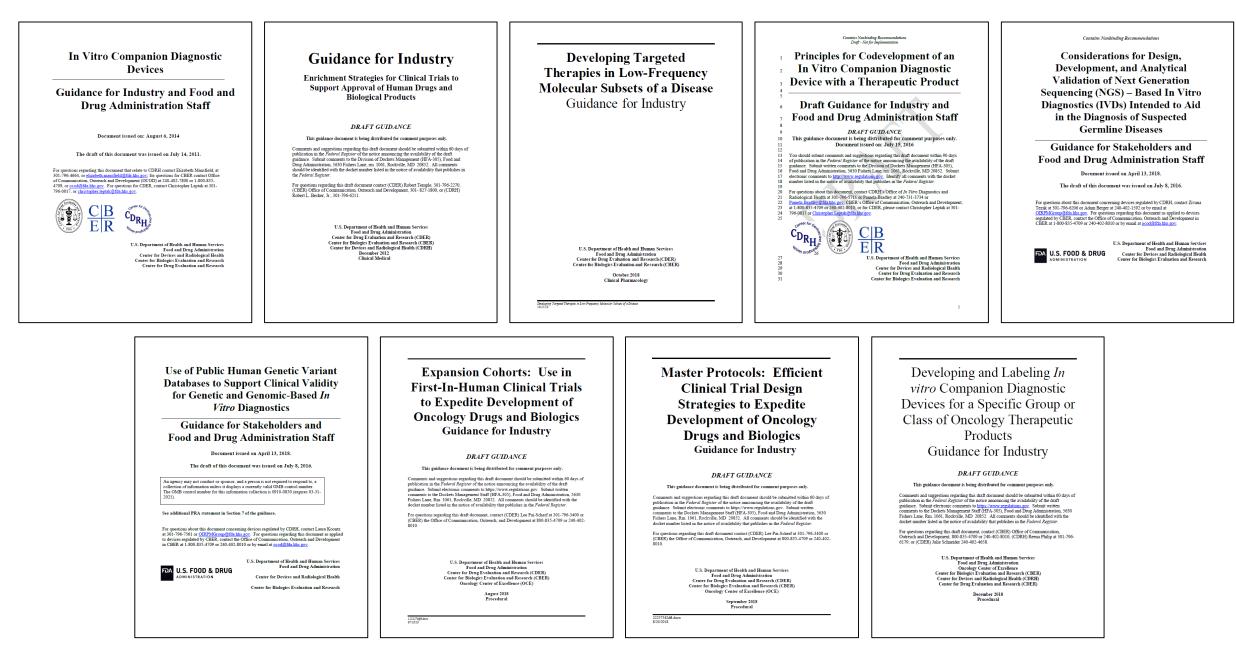
Molecular Enrichment Approaches





Highly enriched trial design
➢ Highly targeted drug
➢ Minimal molecular heterogeneity in disease

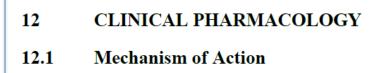
Less enriched trial design → Less targeted drug → All or most molecular alterations expected to respond



Migalastat



- Fabry disease is a rare X-linked disease caused by hundreds of different mutations in the gene encoding alpha-galactosidase A (aGalA), GLA
- Migalastat is a small molecule chaperone that binds aGalA, allowing it to traffic to lysosomes to break down glycosphingolipids
- Patients with "amenable" variants, based on in vitro response in a HEK-293 cell system, were enrolled in clinical trials
- → Indicated for the treatment of adults with a confirmed diagnosis of Fabry disease and an <u>amenable</u> galactosidase alpha gene (GLA) variant based on in vitro assay data



In Vitro Amenability Assay

. . .

In an in vitro assay (HEK-293 assay), Human Embryonic Kidney (HEK-293) cell lines were transfected with specific *GLA* variants (mutations) which produced mutant alpha-Gal A proteins. In the transfected cells, amenability of the *GLA* variants was assessed after a 5-day incubation with 10 micromol/L migalastat. A *GLA* variant was categorized as amenable if the resultant mutant alpha-Gal A activity (measured in the cell lysates) met two criteria: 1) it showed a relative increase of at least 20% compared to the pre-treatment alpha-Gal A activity, and 2) it showed an absolute increase of at least 3% of the wild-type (normal) alpha-Gal A activity.

The in vitro assay did not evaluate trafficking of the mutant alpha-Gal A proteins into the lysosome or the dissociation of migalastat from the mutant alpha-Gal A proteins within the lysosome. Also, the in vitro assay did not test whether a *GLA* variant causes Fabry disease or not.

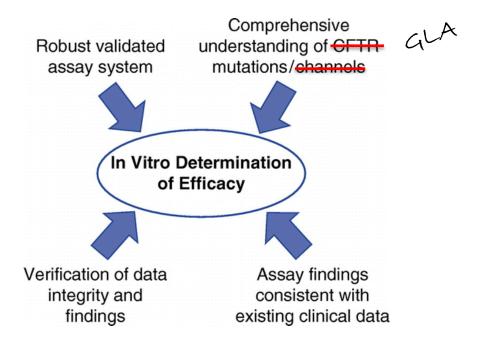
The *GLA* variants which are amenable to treatment with GALAFOLD, based on the in vitro assay data, are shown in Table 2. Inclusion of *GLA* variants in this table does not reflect interpretation of their clinical significance in Fabry disease. Whether a certain amenable *GLA* variant in a patient with Fabry disease is disease-causing or not should be determined by the prescribing physician (in consultation with a clinical genetics professional, if needed) prior to treatment initiation. Consultation with a clinical genetics professional is strongly recommended in cases where the amenable *GLA* variant is of uncertain clinical significance (VUS, variant of uncertain significance) or may be benign (not causing Fabry disease).

Table 2: Amenable GLA Variants Based on the In Vitro Assay

DNA Change (Long)	DNA Change (Short)	Protein Change (1-letter Code)	Protein Change (3-letter Code)
c.7C>G	c.C7G	p.(L3V)	p.(Leu3Val)
c.8T>C	c.T8C	p.(L3P)	p.(Leu3Pro)
c.[11G>T; 620A>C]	c.G11T/A620C	p.(R4M/Y207S)	p.(Arg4Met/Tyr207Ser)
c.37G>A	c.G37A	p.(A13T)	p.(Ala13Thr)
c.37G>C	c.G37C	p.(A13P)	p.(Ala13Pro)
c.43G>A	c.G43A	p.(A15T)	p.(Ala15Thr)

Migalastat





- Are the consequences of individual mutations sufficiently well understood?
- Dose the in vitro assay directly measure the function of the human protein affected by the disease?
- Is the drug's mechanism well-understood and consistent with the mechanism of disease?
- Are clinical data from both drug-responsive and -nonresponsive mutations available?
- Has the assay been formally validated?
- Are raw instrument data available so that results can be recreated?

Tissue Agnostic Drug Development

- Traditional cancer drug development paradigm
 - Based on tumor type, e.g.,
 - Previously untreated pancreatic cancer
 - HCC after previous sorafenib treatment
 - Based on a biomarker within a tumor type, e.g.,
 - HER-2 positive breast or gastric cancer
 - RAS wild-type colorectal cancer

The NEW ENGLAND JOURNAL of MEDICINE First FDA Approval Agnostic of Cancer Site — When a Biomarker Defines the Indication

Steven Lemery, M.D., M.H.S., Patricia Keegan, M.D., and Richard Pazdur, M.D.

Larotrectinib



- Tropomysin receptor kinase inhibitor
- Antitumor activity in cells with constitutive activation of TRK proteins resulting from gene fusions
- Efficacy based on data from patients with NTRK1/2/3 gene fusions enrolled in three single-arm trials
- Indicated for adults and children with <u>solid</u> <u>tumors that have NTRK gene fusion</u> (without known acquired resistance mutation), are metastatic/nonresectable, have no alternative

Tumor Site		Ν	ORR	
	Soft tissue sarcoma	11	91%	
	Salivary gland	12	83%	
	Infantile fibrosarcoma	7	100%	
	Thyroid	5	100%	
	Lung	4	75%	
	Melanoma	4	50%	
Ε	Colon	4	25%	
Г	GIST	3	100%	
•	Cholangiocarcinoma	2	SD, NE	
	Appendix	1	SD	
	Breast	1	PD	
	Pancreas	1	SD	
		Ν	ORR	
	ETV6-NTRK3	25	84%	
	TPM3-NTRK1	9	56%	
	LMNA-NTRK1	5	40%	
	Inferred ETV6-NTRK3	3	100%	
Fusion Partner	IRF2BP2-NTRK1	2	CR, PR	
	SQSTM1-NTRK1	2	PR, PR	
	PDE4DIP-NTRK1	1	PR	
	PPL-NTRK1	1	CR	
	STRN-NTRK2	1	PR	
	TPM4-NTRK3	1	CR	
	TPR-NTRK1	1	PR	
	TRIM63-NTRK1	1	PR	
	CTRC-NTRK1	1	SD	
	GON4L-NTRK1	1	NE	
	PLEKHA6-NTRK1	1	SD	

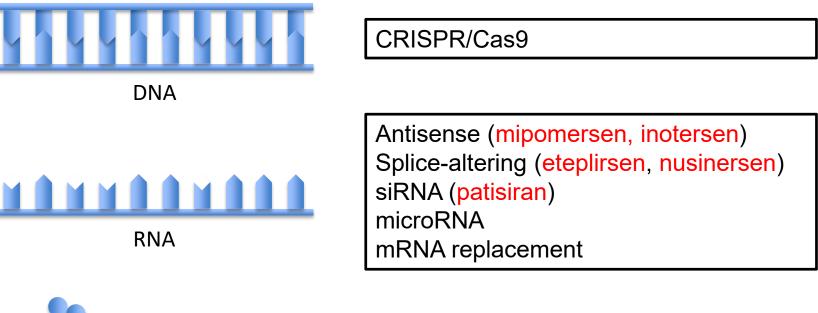
Considerations for Tissue Agnostic Drug Development

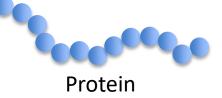


- Establishment of indication-defining biomarkers
- Differences in mutations and resistance mechanisms across cancers
 - BRAF and MEK inhibitors in BRAF V600 colorectal cancer
- Design of clinical trials
 - Available therapies, unmet medical need, magnitude of benefit, size of patient population
- Companion diagnostic development

Genetically Targeted Technologies/Therapies



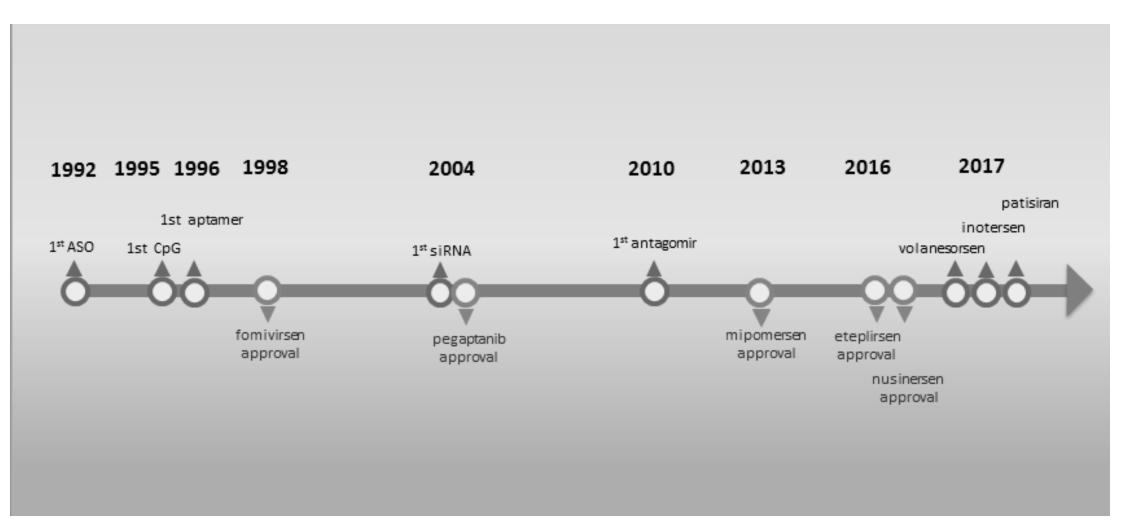




Aptamers (pegaptinib) CpG/TLR

History of Oligo IND/NDA Submissions and NDA Approvals





Courtesy of Xuan Chi (OND, DCRP) and PTCC Oligonucleotide Subcommittee 2018

Synthetic Oligonucleotides Unique Challenges



- Nonclinical pharmacology
 - Animal toxicology target may not be conserved
 - PK primate models to estimate exposure and dosage
- Clinical pharmacology
 - Organ impairment renally cleared, some hepatically targeted
 - Drug interactions endo/exonuclease metabolism, limited interaction potential
 - QT unlikely to interact with HERG
 - Immunogenicity recognized as non-self, anti-drug antibodies can develop
- Safety
 - Thrombocytopenia (consistent, moderate vs. severe, sporadic)
 - Immune-mediated AEs

N-of-1



A tailormade drug developed in record time may save girl from fatal brain disease

By Jocelyn Kaiser | Oct. 19, 2018, 9:00 PM

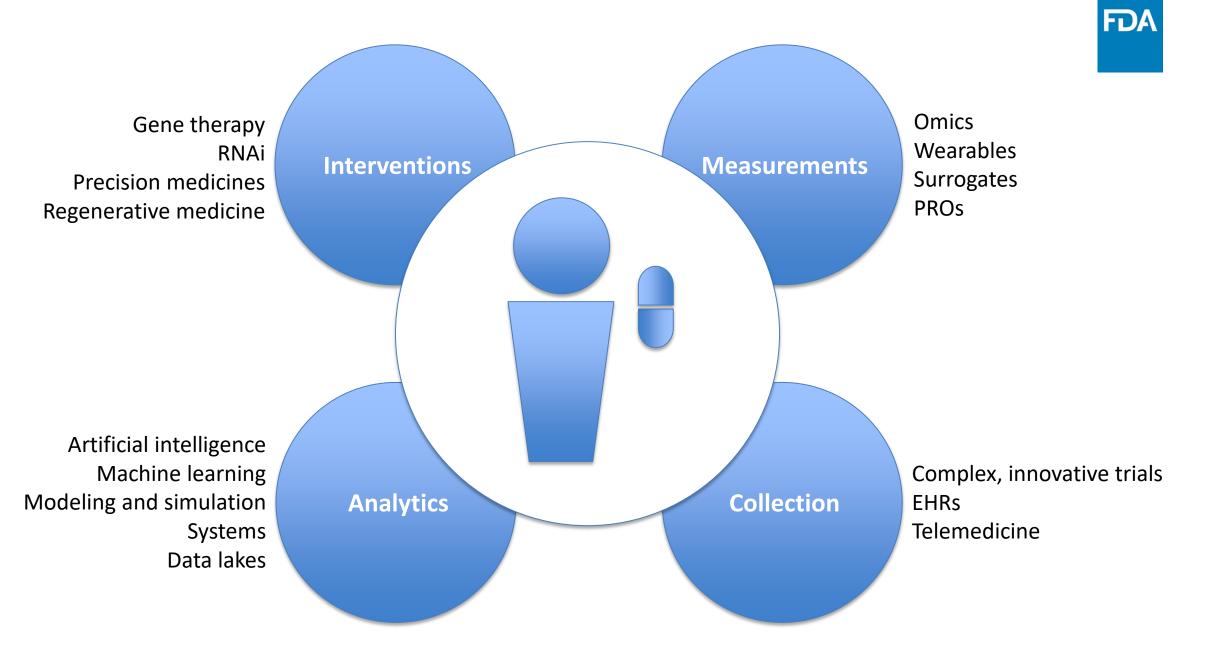
For years, a Colorado couple searched for an explanation for why their bright, active little girl was having increasing trouble walking, speaking, and seeing. In December 2016, Julia Vitarello and Alek Makovec learned that 6-year-old Mila Makovec almost certainly had Batten disease, an inherited and fatal neurodegenerative disorder. Now, in a stunning illustration of personalized genomic medicine, Mila is receiving a drug tailored to her particular diseasecausing DNA mutation—and it appears to have halted the condition's progression.

Today at the annual meeting of The American Society of Human Genetics in San Diego, California, researchers told the story of how in less than a year, they went from sequencing Mila's genome to giving her a **synthetic RNA molecule that helps her cells ignore her genetic flaw** and make a needed protein. The same steps could help some other patients with diseases caused by unique mutations in a single gene, they said.

https://www.sciencemag.org/news/2018/10/tailormade-drug-developed-record-time-may-save-girl-fatal-brain-disease



The Future



Summary



- Technological advancements have facilitated the translation of pharmacogenetics and paved the way for development of targeted therapies
- FDA has communicated via guidance to industry current thinking on emerging technologies and continues adapting to the changing landscape
- Further understanding genomic and other mechanisms of disease will give rise to an increasing number of complex and personalized treatment modalities

