## FDA U.S. FOOD & DRUG ADMINISTRATION

## M Gonzalez Sales, J Fan, L Fang, M Hu, **R** Lionberger, and L Zhao

## Objective

To quantify the magnitude and to identify potential predictors of the observed within subject variability (WSV) of dabigatran in bioequivalence (BE) studies.

## Methods

The WSV in the area under the curve from time 0 to infinity (AUC<sub>inf</sub>) and the maximum concentration  $(C_{max})$  of 17 replicated BE studies including a total of 815 healthy volunteers were analyzed in R using meta-analysis. In these studies each subject received repeated treatment of the reference product in two periods. Age, body weight, height, body mass index, sex, race, the number of subjects per study and region were evaluated as possible predictors of the observed WSV using meta-regression (MR). In case that the MR identifies a study-level predictor, a non-linear mixed effect (NLME) model was developed in NONMEM using individual data to assess whether or not the slope of the predictor was statistically different from 0. Moreover, the impact of extreme values in the computation of WSV was evaluated. Extreme values were defined herein as 3 times the interquartile distance of  $C_{max}$ and AUC<sub>inf</sub> at individual level between periods. WSV was computed as follows:

$$S^{2}_{WR} = \sum_{i=1}^{m} \sum_{j=1}^{n_{i}} \frac{\left(D_{ij} - \overline{D_{i}}\right)^{2}}{2(n-m)}$$

where *i* is the number of *m* sequences used in the study, *j* is the number of  $n_i$  subjects in the i<sup>th</sup> sequence, and  $D_{ii}$  is the individual difference between C<sub>max</sub> or AUC<sub>inf</sub> following repeated administration of the reference product for the i<sup>th</sup> sequence and j<sup>th</sup> subject.

## Results

The WSV of  $C_{max}$  expressed as coefficient of variation was 40% (95%CI: 35%, 44%). Among the 17 studies, WSV ranged from 28% to 61%. The magnitude of the heterogeneity was quantified to be high ( $I^2$ -statistic = 85.0%; Q-statistic = 77.6; p < 0.001; df = 16).

	Figure 1. Meta-analysis results presented as forest plot for $C_{max}$
1 -	31% [95%CI: 26, 36] N=30
2-	31% [95%CI: 26, 35] N=45
3 -	35% [95%CI: 31, 39] N=61
4 -	34% [95%CI: 23, 44] N=58
5 -	53% [95%CI: 42, 65] N=38
6 -	40% [95%CI: 30, 50] N=36
7 -	28% [95%CI: 23, 33] N=42
8 -	61% [95%CI: 50, 72] N=28
9 -	39% [95%CI: 27, 51] N=43
10 -	33% [95%CI: 28, 38] N=55
11 -	43% [95%Cl: 31, 54] N=52
12 -	43% [95%CI: 36, 51] N=37
13 <del>-</del>	50% [95%CI: 40, 60] N=57
14 -	45% [95%Cl: 34, 56] N=58
15 <del>-</del>	36% [95%CI: 31, 42] N=62
16 <del>-</del>	33% [95%CI: 23, 43] N=41
17 -	57% [95%CI: 42, 71] N=72
RE Model -	40% [95%CI: 35, 44] N=815
	$\begin{array}{c} 0 \\ 50 \end{array}$
	vvitnin subject variability in C <sub>max</sub> [% CV]

# Age is a Statistically Significant Predictor of the Within Subject Variability in Dabigatran Pharmacokinetics

Regarding the AUC<sub>inf</sub>, WSV was 38% (95%CI: 34%, 42%) ranging from 30% to 58%. The magnitude of the heterogeneity was quantified to be also high ( $I^2$ -statistic = 81.7%; Q-statistic = 67.2; p < 0.001; df = 16). Figure 2. Meta-analysis results presented as forest plot for AUC<sub>inf</sub>

1 -	31% [95%CI: 25, 37] N=30
2-	30% [95%CI: 24, 36] N=45
3 -	33% [95%CI: 30, 37] N=61
4 -	31% [95%CI: 22, 39] N=58
5 -	46% [95%CI: 36, 56] N=38
6 -	40% [95%CI: 31, 50] N=36
7 -	30% [95%CI: 24, 35] N=42
8 -	58% [95%CI: 48, 68] N=28
9 -	37% [95%CI: 27, 48] N=43
10 -	30% [95%CI: 26, 35] N=55
11 -	39% [95%CI: 30, 49] N=52
12 -	41% [95%CI: 34, 48] N=37
13 -	48% [95%CI: 39, 58] N=57
14 -	42% [95%CI: 32, 51] N=58
15 -	32% [95%CI: 28, 37] N=62
16 -	32% [95%CI: 22, 41] N=41
17 -	52% [95%CI: 40, 63] N=72
RE Model -	38% [95%CI: 34, 42] N=815

### Equation 1



Within subject variability in AUC<sub>inf</sub> [% CV]

For the range of mean ages of the evaluated studies (27.8 to 46.6 years), the mean age was found to be a statistically significant predictor of WSV for both  $C_{max}$  (p = 0.007) and AUC<sub>inf</sub> (p = 0.018). The mean age explained a significant fraction of the total amount of heterogeneity for both  $C_{max}$  (p < 0.007; r<sup>2</sup> = 0.373) and AUC<sub>inf</sub> (p = 0.018;  $r^2 = 0.307$ ).





Body weight, height, body mass index, sex, race, the number of subjects per BE study and region were not found to be predictors of the WSV (p>0.05).

**Division of Quantitative Methods and Modeling**, Office of Research and Standards, Office of Generic Drugs, Center for Drug Evaluation and Research, Food and Drug Administration



The NLME model developed confirmed that the slope of the relationship between WSV and mean age was statistically significant different from 0 supporting the MR finding. For  $C_{max}$  and AUC<sub>inf</sub>, the slopes were estimated to be 0.012 (95%CI: 0.007; 0.017) and 0.009 (95%CI: 0.003; 0.014), respectively. Figure 4. Association between the within subject pharmacokinetic variation and the mean age



PK changes between periods in  $C_{max}$  and AUC<sub>inf</sub> higher than 53.3% and 51.2% were considered extreme. A total of 53 (6.5%) and 58 subjects (7.1%) were removed to compute WSV. For  $C_{max}$ , Pearson's statistic was computed to be (r = 0.959; p < 0.001). The 95%CI ranged from 0.886 to 0.985. For AUC<sub>inf.</sub> Pearson's statistic (95%CI) was computed to be 0.991 (0.973; 0.997). Overall, these results suggests small impact of the subjects with extreme PK variations in the computation of the WSV.





Large heterogeneity was observed across studies. Age was found to be a statistically significant predictor of the observed WSV of dabigatran. Sponsors may expect larger WSV with an increase in the mean age of the recruited subjects. Of note, significant heterogeneity on the WSV of dabigatran's PK parameters remains after adjusting the effect of age. This analysis indicates that the design of BE studies for highly variable drugs has significant uncertainty in the expected value of the WSV even in cases where large amount of data are available.

This poster reflects the views of the authors and should not be construed to represent FDA's views or policies.

Figure 5. Correlation between dabigatran's within subject variability including and excluding subjects with extreme pharmacokinetics variations

## Conclusions

## Disclaimer