Regulatory Utility of Mechanistic Modeling to Support Alternative Bioequivalence Approaches Virtual Public Workshop - September 30th and October 1st 2021

Symposium III/Session 4: Model Acceptance and Model Sharing for Regulatory Use

Model Master File (MMF)

Non-Regulatory Perspective:

What Can Be a MMF and How to Share It?

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Declaration of Conflict of Interest

As the Director of CAPKR (Centre for Applied Pharmacokinetics Research my research is sponsored by a group of pharmaceutical companies (currently Merck, GSK, Eli Lily, Genentech, J&J, AbbVie, EMD Serono, Takeda and Servier) in addition to grants from non-forprofit organizations or government and research councils.

As the Chief Scientific Officer and SVP of R&D at Certara, I have been involved in overseeing the development of software tools which are used by a large group of pharmaceutical companies during drug discovery and development; particularly in the area of physiologically-based pharmacokinetics (PBPK) and quantitative systems pharmacology (QSP).

Disclaimer

This presentation is prepared in my *personal capacity* as a scientist engaged with pharmacology and pharmaceutical science for over 30 years. The opinions expressed herein are my own and do not reflect the views, policies, strategies of any of the organisations I am affiliated with.







Topic for the Next 12 Minutes

DATA Drug/Formulation vs Systems

MODELS

Top-Down vs Bottom-Up vs Middle-Out

SHARING

"What to Share?" "What the Benefits Are?" "Who Are the Beneficiaries?

MASTER FILE → PLATFORM

"Is There Evidence of Impact?"



Borrowing Your Neighbour's Lawn Mower?

Starting from Scratch Is NOT AN IDEAL OPTION!





Journal of Pharmaceutical Innovation (2020) 15:296–317 https://doi.org/10.1007/s12247-019-09392-6

REVIEW ARTICLE



Advances in In Vivo Predictive Dissolution Testing of Solid Oral Formulations: How Closer to In Vivo Performance?

Meera Shrivas¹ • Dignesh Khunt¹ • Meenakshee Shrivas¹ • Manisha Choudhari¹ • Rajeshwari Rathod¹ • Manju Misra¹ (b)





Fig. 1 Schematic of the dissolution/permeation (D/P) system

Gastri

Systems Approach Is Incompatible with Common Philosophy of "Predictive Dissolution"!

There is NO UNIQUE /



That Caters for 'All' Drug/Formulations in "All" Clinical Conditions!



MASTER MODEL FILE: Scaffold for Biology/Physiology Data in Health and Disease



Sponsors of Model Master Files (Platforms & Associated Databases)

- Responsible for creation and <u>continuous</u> maintenance & enhancement of the platform and associated databases
- Unless supported by governments via <u>public tax</u>, or via <u>crowd funding</u> / <u>charities</u>, these will be <u>private companies</u> investing for financial benefit



Karthik Venkatakrishnan^{1,*} and Amin Rostami-Hodjegan^{2,3}

 <u>Collaboration</u> with beneficiaries at the heart of the matter



Beneficiaries of Model Master Files (MMF)

- <u>Patients</u> are the ultimate beneficiaries via access to affordable/safe drugs faster (this is not <u>entire</u> population to justify tax subsidies for MMF)
- **Drug companies** via faster development associated with financial gains
- <u>Consultants</u> (individual/firm) offering commercial services on applications
- Software providers of platforms if successful in a competitive free market
- <u>Regulatory organisations</u> through streamlining the assessment process
 - Beware of <u>Mixing the Roles</u> & consequential ectopic beats leading to cardiac arrest!



(Judge, Jury, State, Lawyer, Defendant, Witness, Police, all in mix)

Counter-Intuitive Nature of Open Source-Code Models:

Reproducibility in systems biology modelling

Krishna Tiwari^{1,2}, Sarubini Kananathan¹, Matthew G Roberts¹, Johannes P Meyer¹, Mohammad Umer Sharif Shohan¹, Ashley Xavier¹, Matthieu Maire¹, Ahmad Zyoud¹, Jinghao Men¹, Szeyi Ng¹, Tung V N Nguyen¹, Mihai Glont¹, Henning Hermjakob^{1,3,*} & Rahuman S Malik-Sheriff^{1,**}

molecular DOI 10.15252/msb.20209982 systems Mol Syst Biol. (2021) 17: e9982 biology 37% 180 Are model 135 directly 51% 90 reproducible ? 9% (n =455) 45 🔵 Yes 🛛 🔵 No Models could not be directly reproduced (n = 222) Models could not be reproduced Reproduced with empirical correction Reproduced with author's support

"Open" Sounds Nice & Positive! *BUT NOT SO* If we apply it to safe place for keeping precious posessions:

> "Easily Accessible" & "Unsecure"

> > Hence

"Vulnerable" to "Adulteration"

A Consortium Approach:

Platform vs Model



CLINICAL PHARMACOLOGY & THERAPEUTICS, 104 (1), JULY 2018

Physiologically Based Pharmacokinetic Model Qualification and Reporting Procedures for Regulatory Submissions: A Consortium Perspective

Mohamad Shebley¹, Punam Sandhu², Arian Emami Riedmaier¹, Masoud Jamei³, Rangaraj Narayanan⁴, Aarti Patel⁵, Sheila Annie Peters⁶, Venkatesh Pilla Reddy⁷, Ming Zheng⁸, Loeckie de Zwart⁹, Maud Beneton¹⁰, Francois Bouzom¹¹, Jun Chen¹², Yuan Chen¹³, Yumi Cleary¹⁴, Christiane Collins¹⁵, Gemma L. Dickinson¹⁶, Nassim Djebli¹², Heidi J. Einolf¹⁷, Iain Gardner³, Felix Huth¹⁸, Faraz Kazmi⁹, Feras Khalil¹⁹, Jing Lin²⁰, Aleksandrs Odinecs²¹, Chirag Patel²², Haojing Rong²³, Edgar Schuck²⁴, Pradeep Sharma⁷, Shu-Pei Wu²⁵, Yang Xu²⁶, Shinji Yamazaki²⁷, Kenta Yoshida¹³ and Malcolm Rowland²⁸

A case example for MMF as **PBPK Package** for submission to regulatory agencies.

Green Frame - The PBPK platform

<u>Undergo qualification only once and re-</u> used for other cases;

Blue Frame - The PBPK Component Files Undergo verification for each submission.

Lateral Expansion / Wider Use of Mechanistic Multi-Layer Models

Non-Open-Source/Commercial Platforms Played a 'significant' Role:



For Those Who Are Interested In Further Information





A One Hour Interview - Available on YouTube at the Following Link:

https://youtu.be/gEnDrKiMS50



Topic for the Next 3 Minutes A Case Example The Need for MMF (PLATFORM & DTATABASE) **Virtual Bioequivalence** (VBE) & **Assigning Within-Subject Variability** (WSV) **During Modelling and Simulations** (M&S)

Cross-Over Design Protects against Biased Estimates of Relative BE for:

MEAN

However, BE Studies are Sensitive to Inter-occasion Variability (IOV)/Within-Subject Variability (WSV)/Intra-Individual Variability which Influence the:

CONFIDENCE INTERVAL

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Workflows of VBE Studies Accounting for WSV



Sets of Hypothetical WSV in Physiological Parameters of GI Tract

		-			-	-			-	-		-	-		
Physiological Parameters - WSV CV%	Default	Set 1	Set 2	Set 3	Set 4	Set 5	Set 6	Set 7	Set 8	Set 9	Set 10	Set 11	Set 12	Set 13	Set 14
Gastric MRT(h)	38	19	19	19	25	30	25	25	30	25	19	38	38	38	19
Small Intestine MRT (h)	30	15	15	15	10	10	10	20	15	10	15	15	15	30	15
Colon MRT (h)	30	30	30	30	30	20	20	30	30	30	30	30	30	30	30
Duodenum pH Fasted	16	16	16	8	16	8	10	16	10	16	16	16	16	16	Dy
Duodenum Bile Salt Conc Fasted	97	97	49	97	70	97	70	49	49	49	49	97	97	97	49
Jejunum I pH Fasted	13	13	13	7	13	7	10	13	5	13	13	13	13	13	Dy
Jejunum I Bile Salt Conc Fasted	100	100	50	100	70	100	70	50	50	50	50	100	100	100	50
Jejunum II pH Fasted	11	11	11	6	11	6	10	11	5	11	11	11	11	11	Dy
Jejunum II Bile Salt Conc Fasted	42	42	21	42	30	30	30	21	21	21	21	21	42	21	21

Table 2 Different sets of WSV in GI physiology investigated

CV% differing from the default (BSV) value are highlighted blue. CV% for volume of water administered was set to 1%, initial volume of stomach fluid at 30%, stomach pH at 38% and drug clearance to 5% in all sets except Set 10 (where CV% in CL was set to 0%). CVs for liver and brain volume and kidney weight were set to zero. Dy=dynamic (option in the Simcyp simulator)

Assessing Incompatibility of Assigned WSV in Physiological Parameters Using Comparison with Observed WSV of PK



Variation relative to mean of the two occasions

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Exclusion of Certain Sets of WSV in Physiological Parameters of GI Tract hat Are Incompatible with PK observations for WSV.

Table - Comparison of simulated *vs* observed intra-subject variability (Full set of individuals, Kolmogorov-Smirnov test)

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Observed vs Predicted Distributions (AUC, C _{max} and T _{max}) (Kolmogorov-Smirnov Test)									
SET	D statistic AUC	Similarity (Y/N)	D statistic Cmax	Similar ity Y/N)	D statistic Tmax	Similarity (Y/N)			
(defa ult)	0.350	No	0.417	No	0.200	Yes			
1	0.200	Yes	0.217	Yes	0.150	Yes			
2	0.167	Yes	0.150	Yes	0.217	Yes			
3	0.367	No	0.367	No	0.217	Yes			
4	0.133	Yes	0.200	Yes	0.133	Yes			
5	0.267	No	0.317	No	0.183	Yes			
6	0.183	Yes	0.250	No	0.167	Yes			
7	0.217	Yes	0.167	Yes	0.133	Yes			
8	0.167	Yes	0.167	Yes	0.183	Yes			
9	0.233	Yes	0.317	No	0.200	Yes			
10	0.217	Yes	0.233	Yes	0.183	Yes			
11	0.200	Yes	0.183	Yes	0.133	Yes			
12	0.300	No	0.250	No	0.133	Yes			
13	0.317	No	0.333	No	0.217	Yes			
14	0.133	Yes	0.167	Yes	0.217	Yes			

WSV in physiology is independent of a pH Fasted Duodenum given drug/formulation and same for a pH Fasted Jejunum 1 given condition (unless they are pharmacologically acting on GI tract) **Transit Time Colon** ■ Cmax Despite being the same for all drugs/ ■ AUC pH Fasted Jejunum 2 formulations, some of WSV in Mean Small Intestinal Transit Time physiology do not propagate to **Bile Fasted Jejunum 2** outcome for a some drugs/ pH Fasted lleum 1 formulations. **Bile Fasted Jejunum 1** (hence, the requirement to run the calculations for several drugs/ Mean Gastric Emptying Time formulations with different characteristics) Fasted **Bile Fasted Ileum 1** Global Sensitivity Analysis (GSA, Morris Method, Simcyp) as the absolute mean (μ^*) values. **Bile Fasted Duodenum** Initial Volume of Stomach High μ^* indicates a parameter with an important influence on the Fluid Fasted model output (AUC, C_{max} or T_{max}). 2 3 1 4 0

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μ



Implications for VBE Studies & Predicting the Likelihood of Passing the Criteria with Given Number of Subjects



Median of VBE's

Overlay of Clinical Data

Relevance of Model Master File Avoids Starting from Scratch! by Accumulating <u>CONTINUOUS</u> Effort on Using Previous Studies on VARIOUS DRUGS/FORMULATIONS to Gain Insight into DRUG/FORMULATION-INDEPNDENT

WSV/IOV of Physiology as an Example: Once Fully Resolved, This Can be Incorporated in Any User-Friendly Model Master File Specifically Built for VBE



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