## CLEARSIDE BIOMEDICAL

Victor Chong, MD, MBA

CMO, EVP, Head of R&D

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# February 2023 FDA Draft Guidance on wAMD Development

### Neovascular Age-Related Macular Degeneration: Developing Drugs for Treatment Guidance for Industry

Feb 2023 DRAFT guidance For comment purposes only



Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit electronic comments to <u>https://www.regulations.gov</u>. Submit written comments to the Dockets Management Staff (HFA-305), Food and Drug Administration, 5630 Fishers Lane, Rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document, contact Wiley Chambers at 301-796-0690, or (CBER) Office of Communication, Outreach and Development at 800-835-4709 or 240-402-8010.

> U.S. Department of Health and Human Services Food and Drug Administration Center for Drug Evaluation and Research (CDER) Center for Biologics Evaluation and Research (CBER)

> > February 2023 Clinical/Medical

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This draft guidance, when finalized, will represent the current thinking of the Food and Drug Administration (FDA or Agency) on this topic. It does not establish any rights for any person and is not binding on FDA or the public. You can use an alternative approach if it satisfies the requirements of the applicable statutes and regulations. To discuss an alternative approach, contact the FDA staff responsible for this guidance as listed on the title page.

DRAFT guidance not finalized Can use an alternative approach

> **Contains Nonbinding Recommendations** Draft — Not for Implementation



## **Confusion 1: Superiority over control group**

#### A. Trial Design

Sponsors developing drugs for the treatment of neovascular age-related macular degeneration should consider the following regarding trial design:

• FDA recommends parallel-group, randomized by patient, double-masked trials in which the investigational drug group demonstrates superiority over the control group.

Alternatively, FDA recommends parallel-group, randomized by patient, double-masked trials in which the investigational drug group demonstrates noninferiority either to ranibizumab injection administered intravitreally every 4 weeks or to affibercept administered intravitreally either every 4 weeks or every 8 weeks (after 3 monthly injections).

Superiority

Non-inferiority

Is it ethical to perform a superiority trial to no treatment or under treatment when there is a good standard of care?



## **Confusion 2: Comparator in non-inferiority vs superiority design**

• Alternatively, FDA recommends parallel-group, randomized by patient, double-masked trials in which the investigational drug group demonstrated noninferiority either to ranibizumab injection administered intravitreally every 4 weeks or to affibercept administered intravitreally either every 4 weeks or every 8 weeks (after 3 monthly injections).



#### B. Comparator

Sponsors developing drugs for the treatment of neovascular age-related macular degeneration should consider the following regarding comparative clinical trials:

Each investigational drug arm is expected to have at least one other comparative arm in which the dosing frequency, criterion for dosing adjustments, and criterion for interventions are the same.

Superiority



## **Focusing on Non-inferiority trial**

**Contains Nonbinding Recommendations** Draft — Not for Implementation Visual loss 20/32

- For a trial designed as a noninferiority trial, the sponsor should enroll patients with neovascularization caused by age-related macular degeneration who have visual loss.
- Neovascular macular degeneration secondary to causes other than aging (such as presumed ocular histoplasmosis or high myopia) are considered separate indications, and sponsors should study patients with these conditions separately.



#### D. Efficacy Considerations

Sponsors developing drugs for the treatment of neovascular age-related macular degeneration should consider the following regarding efficacy:

- In general, safety and efficacy should be demonstrated in at least two adequate and well-controlled, multicenter trials utilizing different investigative sites.
- One eye per patient should be prespecified as the study eye for the purposes of the efficacy analysis even if both eyes are treated. Both eyes should be followed for safety.



### **Contains Nonbinding Recommendations** Draft — Not for Implementation

— A two-sided, 95 percent confidence interval in which either the lower bound of the confidence interval for the difference between the investigational drug group and a ranibizumab injection group is greater than or equal to -4.5 letters or the lower bound of the two-sided, 95 percent confidence interval for the difference between the investigational drug group and an aflibercept group is greater than -4.5 letters in mean best corrected distance visual acuity<sup>6</sup> at 9 months<sup>7</sup> or later after the start of drug administration.



### E. Safety Considerations

Sponsors developing drugs for the treatment of neovascular age-related macular degeneration should consider the following regarding safety:

- FDA recommends that approximately 400 or more patients using the investigational drug complete treatment with a concentration of the investigational drug at least as high as proposed for marketing and with a dosing frequency at least as frequent as proposed for marketing.
- Before submission of a marketing application, the sponsor should ensure that at least 300
  patients have completed at least 9 months of follow-up after the initiation of treatment.
- FDA recommends that at least one concurrently controlled safety trial be conducted for at least 2 years' duration.<sup>10</sup>



## **Clinical Evaluations**

#### F. Clinical Evaluations

Sponsors developing drugs for the treatment of neovascular age-related macular degeneration should consider the following regarding clinical evaluations:

• At a minimum, FDA recommends sponsors perform the following evaluations in each eye and report separately for each eye (regardless of which eye or eyes are treated):

- Best corrected distance visual acuity<sup>11</sup> at every visit.

Dilated seven-field fundus photographs or equivalent wide-field views at no less than
 6-month intervals during the first 2 years.



## **Clinical Evaluations**

A dilated slit lamp examination of the anterior segment including the cornea, conjunctiva, anterior chamber, iris, lids, and lashes. At a minimum, examinations should be performed at baseline and at no less than 3-month intervals during the first year and no less than every 6 months during the second year.

Applanation tonometry at no less than 3-month intervals. If the investigational drug is administered topically, dosing of the drug should be at least 30 minutes after use of any anesthetic drug.

Endothelial cell count at baseline and at the end of at least one 9-month or longer trial.

• If systemic exposure is minimal, systemic clinical and laboratory evaluations are recommended at baseline and at the end of at least one 9-month or longer trial. If systemic exposure is not minimal, systemic clinical and laboratory evaluations are recommended at regular intervals in all clinical trials.



- FDA recommends that the sponsor demonstrate one of the following:
  - A statistically significant smaller percentage of patients with a doubling of the visual angle<sup>5</sup> in best corrected distance visual acuity<sup>6</sup> at 9 months<sup>7</sup> or later after the start of drug administration in the investigational drug treatment group compared to the control<sup>8</sup> group;
  - A statistically significant larger percentage of patients with a halving of the visual angle<sup>9</sup> in best corrected distance visual acuity<sup>6</sup> at 9 months<sup>7</sup> or later after the start of drug administration in the investigational drug treatment group compared to the control group;
  - A statistically significant difference between groups in mean best corrected distance visual acuity<sup>6</sup> of 15 or more letters at 9 months<sup>7</sup> or later after the start of drug administration.

<sup>7</sup> For cellular and gene therapy products, FDA recommends that efficacy be demonstrated at 12 months or later.

<sup>8</sup> Control can be the vehicle of the investigational drug or another drug.



<sup>&</sup>lt;sup>5</sup> The phrase *doubling of the visual angle* is equivalent to 15 letters or more decrease on an ETDRS visual acuity chart measured at a distance of 4 meters or longer.

<sup>&</sup>lt;sup>6</sup> Best corrected distance visual acuity can be measured at 3 meters instead of 4 meters if measured using an automated threshold testing system.

<sup>&</sup>lt;sup>9</sup> The phrase *halving of the visual angle* is equivalent to 15 letters or more improvement on an ETDRS visual acuity chart measured at a distance of 4 meters or longer.

## Why rescue with anti-VEGF could be a problem?

A decrease in the number of administrations of available effective therapies alone is not sufficient for the demonstration of efficacy.



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Thank you