

Feedback from the EFSPI / EFPIA Estimand Implementation Working Group

5th EFSPI Regulatory Statistics Workshop, October 12-13, 2020

David Wright¹, Vivian Lanius² and Armin Schüler³ on behalf of the EIWG

1 Head of Statistical Innovation, Early Biometrics and Statistical Innovation, Data Science and Artificial Intelligence, R&D, AstraZeneca, Cambridge UK.

2 Expert Statistician Thrombosis & Hematology, Statistics & Data Insights, R&D, Bayer AG.

3 Head of Biostatistics Oncology, Biostatistics, Epidemiology & Medical writing, Merck Healthcare KGaA.

EFPIA / EFSPi Estimand Implementation Working Group (EIWG)



European Federation of Pharmaceutical
Industries and Associations



European Federation of Statisticians in the Pharmaceutical Industry
Representing Statistical Associations in Europe

EIWG brings together statisticians and clinicians to support the estimand journey

Acknowledgements

Thanks to the EIWG for their contributions to the group and comments on the slides.

EIWG Members

Institution	Member
	Mary Elliott-Davey
	David Wright
	Vivian Lanius
	James Bell
CONSILIUM Salmonson & Hemmings	Rob Hemmings*
PT Stat Consulting	Paul Terrill
	Chrissie Fletcher+
	Oliver Keene
	Jatin Patel (C)
	Millie Wang (C)

Institution	Member
	Maria Efstathiou
	Christian Pipper
	Pepa Polavieja
	Nanco Hefting+ (C)
	Mette Josiassen
	Michael Tribanek
	Armin Schueler
MHRA	Khadija Rantell
	Nick Manamley
	Melanie Wright

Institution	Member
	Helle Lynggaard
	Irina Matytsina (C)
	Rikke Mette Agesen (C)
	Maria Dilleen
	Rod Junor (C)
	Sue McKendrick
	Nikolay Stoyanov
	Judith Anzures-Cabrera
	Estelle Lambert
	Christian Loesch
	Katsumi Yoshida

+Co-Lead *Adhoc member C = Clinician

EIWG Charter – Purpose

- ◆ To provide a cross-industry forum to:
 - share Industry experiences of implementing the new estimand framework introduced in ICH E9(R1) and
 - engage in scientific discussion about the value and benefits of the framework
- ◆ With the aim to:
 - give feedback and recommendations for best practices
 - consolidate issues and topics for discussion with the ICH E9 Implementation Working Group
 - to raise awareness and promote the value of the framework across industry and beyond

Activities up-to now

Monthly Meetings including a full-day kick-off meeting

- Sharing of estimand implementation plans and current status at each company at the kick-off meeting
- Going through ICH E9(R1) line by line as a team to get a common understanding
 - top 5 priorities of the EIWG (pre-COVID-19):
 - Role of analysis sets
 - Incorporating the new framework into protocols and SAPs including impact to standards
 - Training materials
 - Common understanding of the guideline, and
 - Impact to programming.
- Impact of COVID-19 from an Estimands perspective
- Review of ICH M11 protocol template & best practices for incorporating estimands into protocols
- Alignment on training plan
- Alignment on engagement and advocacy plan

Activities up-to now

Communications

- PSI annual meeting: Session on Impact of COVID-19 to Estimands
- Feed information and experience on estimands into other cross-Pharma groups (for example Pharmaceutical Industry COVID-19 Biostatistics Working Group and TransCelerate).

What (benefits) do members take out of the EIWG?

- ◆ **Motivation & Inspiration:** interest in improving trial design and best practice to “future proof” clinical trials
- ◆ **Networking:** exposure to a broader network of involved clinicians and statisticians
- ◆ **Learning & Understanding:** reflection on ICH E9(R1) to achieve a greater & common understanding, appreciation of challenges, gaps, caveats and opportunities for **practically implementing** estimand framework thinking, highlighting areas where regulatory guidance would be helpful
- ◆ **Sharing & Soundboard:** opportunity to very openly share

experiences
feedback best practice
interaction with authorities
learnings interpretation examples
case studies
challenges
priorities

standards
on the implementation of estimands
across companies,
therapeutic areas, and functions
eventually helping to develop a
consistent approach

- ◆ **Ad-hoc benefit:** discussion of the impact of COVID-19 using estimand framework
- ◆ **Awareness & Influencing:** learn about and contribute to

presentations
publications standards
initiatives seminars

Ongoing/planned Activities

Activities to raise awareness and promote the value:

- Training through case studies
- Communication plan highlighting emerging news and trends relating to estimands

Activities to provide recommendations on best practices:

- Develop best practices to provide documentation in clinical trial protocols/SAPs
- Develop generic case studies to support implementation
- Outreach and collaboration with key stakeholder groups, *e.g.*, TransCelerate

Ongoing/Planned Activities - Training

Training concept

- Introduce the value and benefits of the estimand framework through real life case study examples for which results are available in the public domain.
- The approach has been chosen as complementary to the existing training material available through the ICH website.
- Webinar format
- For each case study:
 - the background will be provided, intercurrent events of interest will be discussed
 - Will be used as a vehicle to highlight different aspects of interest to invoke some discussion/reflection

Target audience

- Cross functional audience: clinician, regulatory affairs, medical writers, statisticians, investigators working in pharmaceutical industry, public health or academia.
- As a second step, separate case study discussions focusing on aspects of interest to a statistical audience may be developed

Estimands in Study Protocols – a Patchwork Quilt at the Moment?

	Objectives	Endpoints
Primary	<ul style="list-style-type: none"> To demonstrate non-inferiority of <drug> to active-1 every 4 weeks in participants with severe eosinophilic asthma 	<ul style="list-style-type: none"> Rate of clinically significant exacerbations over 52 weeks
Secondary	<ul style="list-style-type: none"> To demonstrate superior efficacy of treatment with X as compared to placebo based on change from Baseline in YY 	<ul style="list-style-type: none"> Death or respiratory failure (... on the 8-point ordinal of disease severity) at Day 28:

Primary estimand

The primary clinical question of interest is: What is the treatment effect on exacerbations after 52 weeks of treatment with <drug> compared to treatment with active-1 in participants with severe eosinophilic asthma regardless of treatment discontinuation for any reason and regardless of initiation of rescue medication and in the hypothetical situation of no use of non-randomised biological treatment?

The estimand is described by the following attributes:

- Population: participants with severe eosinophilic asthma.
- Treatment condition: <drug> given every 4 weeks to active-1 every 4 weeks, both treatments given on top of standard of care (SoC). Further details on SoC can be found in Section x.
- Variable: number of clinically significant exacerbations over 52 weeks.
- Summary measure: rate ratio of exacerbations between the <drug> arm and the active comparator arm
- Intercurrent events:
 - Study treatment discontinuation – treatment policy strategy
 - Use of rescue medication - treatment policy strategy
 - Return to original pre-study biological treatment - hypothetical strategy
- Rationale for estimand: Interest lies in the treatment effect when medication is taken for the entire study duration. For participants discontinuing randomised medication or using rescue medication, use of a treatment policy strategy recognises that this could be due to an unfavourable cause. The study is designed to evaluate treatment effects attributable to <drug> and it is important that this effect is not confounded by the effect of other biological treatment. Therefore, for participants who return to their original biological treatment, a hypothetical strategy will be used.

Estimand

Time-free survival measured by time from [study intervention A] vs. [study intervention B] according to RECIST 1.1 assessed by [study intervention A] vs. [study intervention B] occurring within two scheduled tumor [study intervention A] vs. [study intervention B] evaluable assessment or [study intervention A] vs. [study intervention B]

Category: [study intervention A] vs. [study intervention B]

Composite of [study intervention A] vs. [study intervention B] considered as event of interest [study intervention A] vs. [study intervention B] (treatment policy strategy), [study intervention A] vs. [study intervention B] (intercurrent event) [study intervention A] vs. [study intervention B] (anticancer treatment (treatment-policy strategy) [study intervention A] vs. [study intervention B] unless if the intercurrent event) [study intervention A] vs. [study intervention B]

Summary: Hazard Ratio

Estimands in Study Protocols – a Patchwork Quilt at the Moment?

Different companies are using slightly different ways of expressing Estimands in protocol templates

Ongoing process on

- ◆ What level of detail is needed in §3 of the protocol on estimands?
- ◆ How to include Estimands into the Objectives/Endpoints Table in the Protocol?

One of the roles of the EIWG is to celebrate good practice here and make recommendations to cross Pharma groups such as TransCelerate to establish an appropriate standard way of incorporating Estimands into clinical trial protocols.

Principles for Incorporating Estimands into Clinical Trial Protocols

- ◆ **Estimand concept – required for all trials using the template?**
 - Encourage use of estimands!
If optional, estimands concepts cannot be integral to the template structure → modularity
 - Note that many of the estimands elements are still relevant.
- ◆ **Role and level of detail for objectives**
 - Definition at low detail level (“To show efficacy”)?
 - Definition at high detail level (detailed clinical objectives, i.e., estimand attributes jointly with desired goal/claim)?
- ◆ **Protocol structure**
 - Focus to shift from traditional structure around endpoints to estimands and/or objectives

– *work in progress* –

Communication & Advocacy Plan

- ◆ Regular updates on EIWG activities via EFSPI & EFPIA newsletters
- ◆ Information, news and articles of interest on EFPIA & EFSPI websites
- ◆ ‘1-year after ICH E9(R1)’ publication (end 2020)
- ◆ Work with EFPIA to reach out to clinical researchers, regulatory affairs, investigators, patients
 - Understanding, awareness, training
- ◆ Work with ISPOR to reach out to HTA/payer stakeholders
- ◆ Collaborate with other societies and scientific debate, e.g., DIA, ASA
- ◆ Connect with ICMJE to incorporate estimands into publications
- ◆ Connect with CT.GOV to incorporate estimands into clinical trial registries
- ◆ Collaborate with TransCelerate and CPT/CSAP
- ◆ Collaborate with PhUSE on programming aspects
- ◆ Share experiences and feedback with ICH E9 WG

Summary

- ◆ Group is thriving with multiple different subteams working on Communication, Training and describing estimands in protocols and SAPs.
- ◆ Look out for first case study webinar later this year and more to come in 2021.
- ◆ If others are interested in joining the group please contact Chrissie Fletcher
chrissie.a.fletcher@gsk.com

References and Additional Resources

- ◆ See papers in Therapeutic Innovation and Regulatory Science (2020):
 - [Choosing Estimands in Clinical Trials: Putting the ICH E9\(R1\) Into Practice](#)
 - [Defining Efficacy Estimands in Clinical Trials: Examples Illustrating ICH E9\(R1\) Guidelines](#)
 - [Aligning estimators with estimands in clinical trials: Putting ICH E9\(R1\) guidelines into practice](#)
- ◆ Statistical issues and recommendations for clinical trials conducted during the COVID-19 pandemic, Statistics in Biopharmaceutical Research (2020):
<https://www.tandfonline.com/doi/full/10.1080/19466315.2020.1779122>
- ◆ See recent “Virtual” Issue of Pharmaceutical Statistics on Estimands:
[https://onlinelibrary.wiley.com/doi/toc/10.1002/\(ISSN\)1539-1612.estimands-virtual-issue](https://onlinelibrary.wiley.com/doi/toc/10.1002/(ISSN)1539-1612.estimands-virtual-issue)

Thank you

Any Questions?