

---

# **A bioequivalence study design in Immunology which includes the option for sample size re- estimation (SSR) at the Interim Analysis**

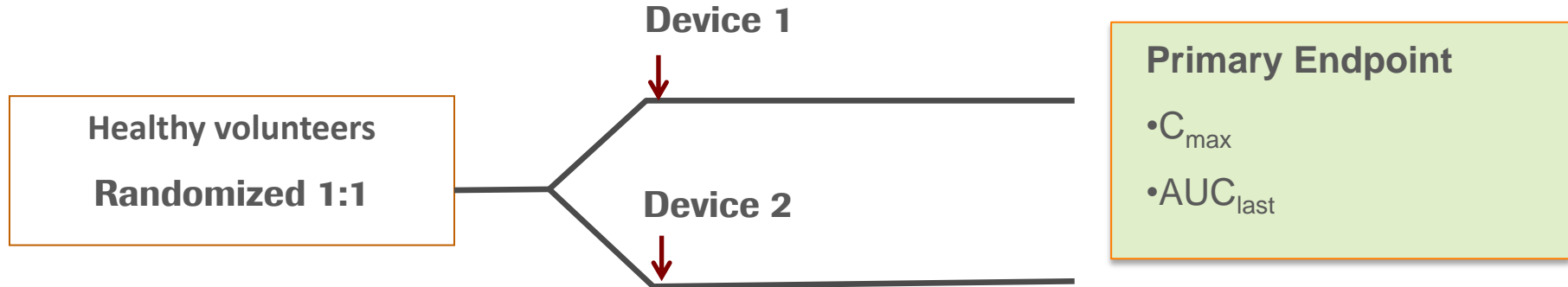
*Jennifer Pulley*  
*(Statistical Scientist)*

# Overview

- Study design
- Interactions with the Health Authorities
- Revised study design
- Sample size re-estimation (SSR) algorithm and analysis approach

# Bio-equivalence Study Design

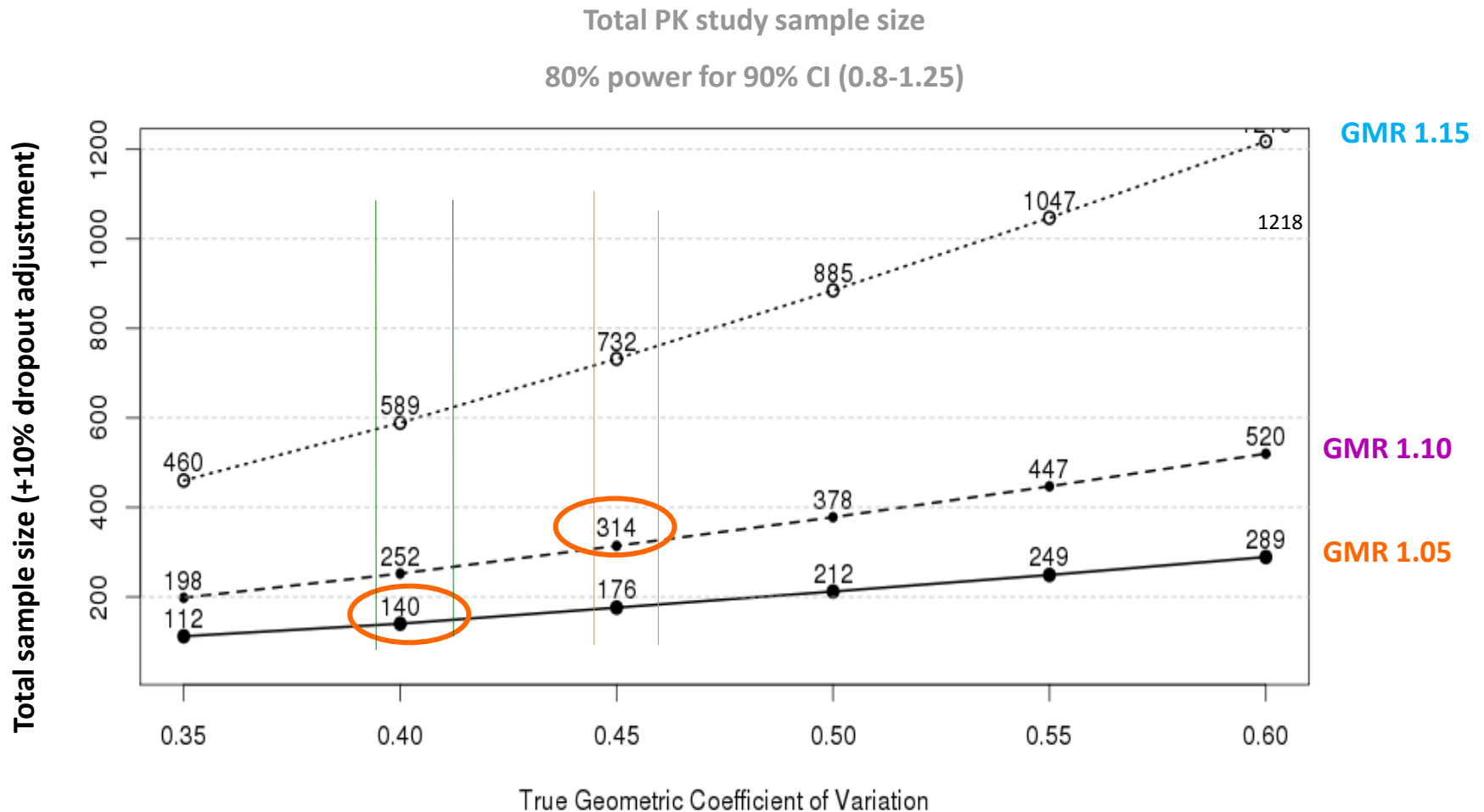
- Support device development for a large phase III immunology molecule
- Drug has a long half life which lead to use of a parallel design over a cross over design



## Bioequivalence/comparability criterion:

- 90% confidence interval for geometric mean ratio (GMR) (Device 1 vs. Device 2) of both C<sub>max</sub> and AUC<sub>last</sub> is contained within 0.8-1.25

# Sample Size Options for varying GMR and CV

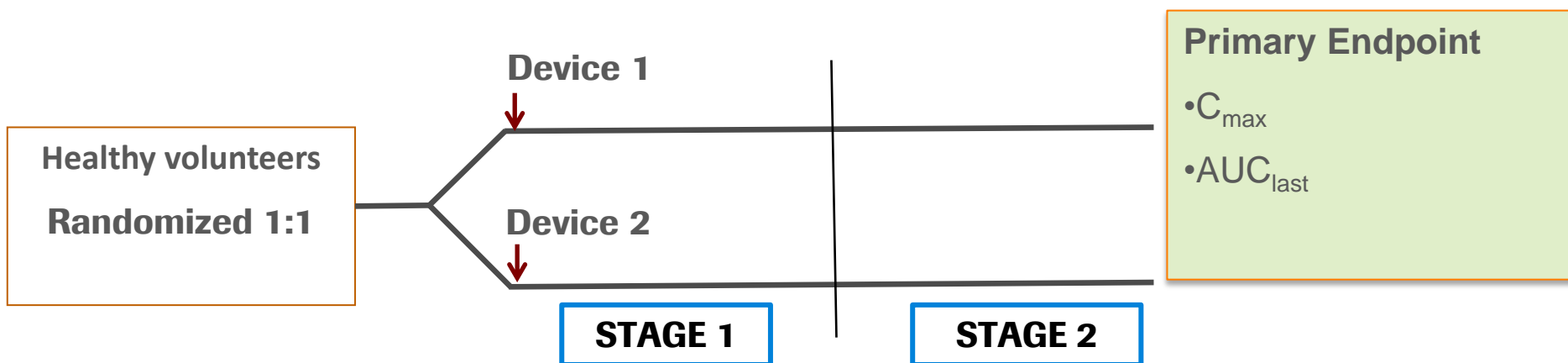


GMR=Geometric mean ratio (ratio of mean AUC or Cmax for the two devices)

Plot created using R

Power.Tost package in R was used to calculate the Sample size calculation

# PK Comparability Interim Analysis Study Design



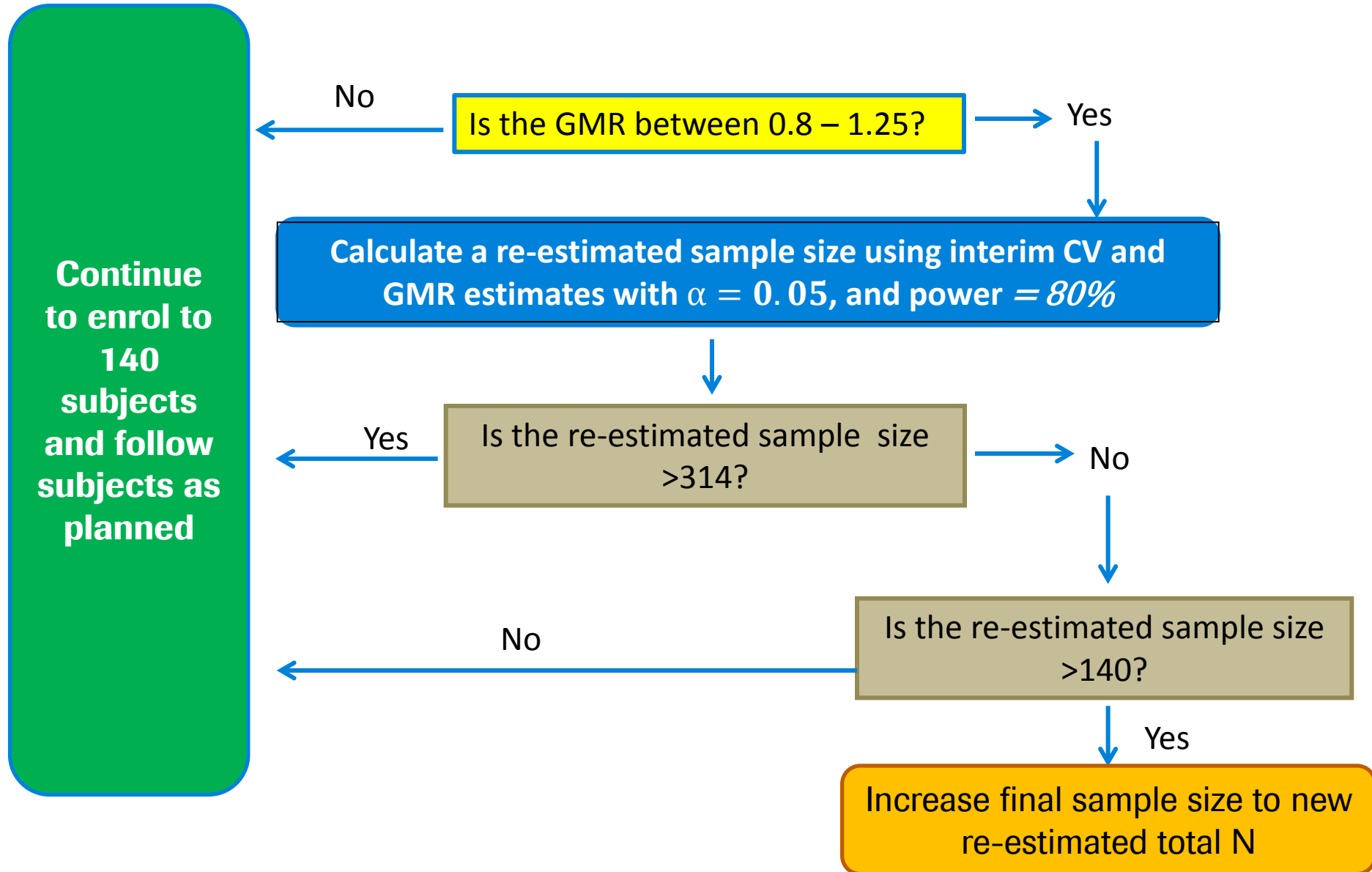
## Interim Analysis – Sample Size Re-estimation (SSR)

Following stage 1 and once 60 subjects (30 per arm) provided PK samples out to day X the IA will be conducted by a third party vendor to re-estimate sample size

## Bioequivalence/comparability criterion

90% confidence interval for geometric mean ratio (GMR) (Device 1 vs. Device 2) of both  $C_{max}$  and  $AUC_{last}$  is contained within 0.8-1.25

# Two Stage BE Study Design – Decision Criteria



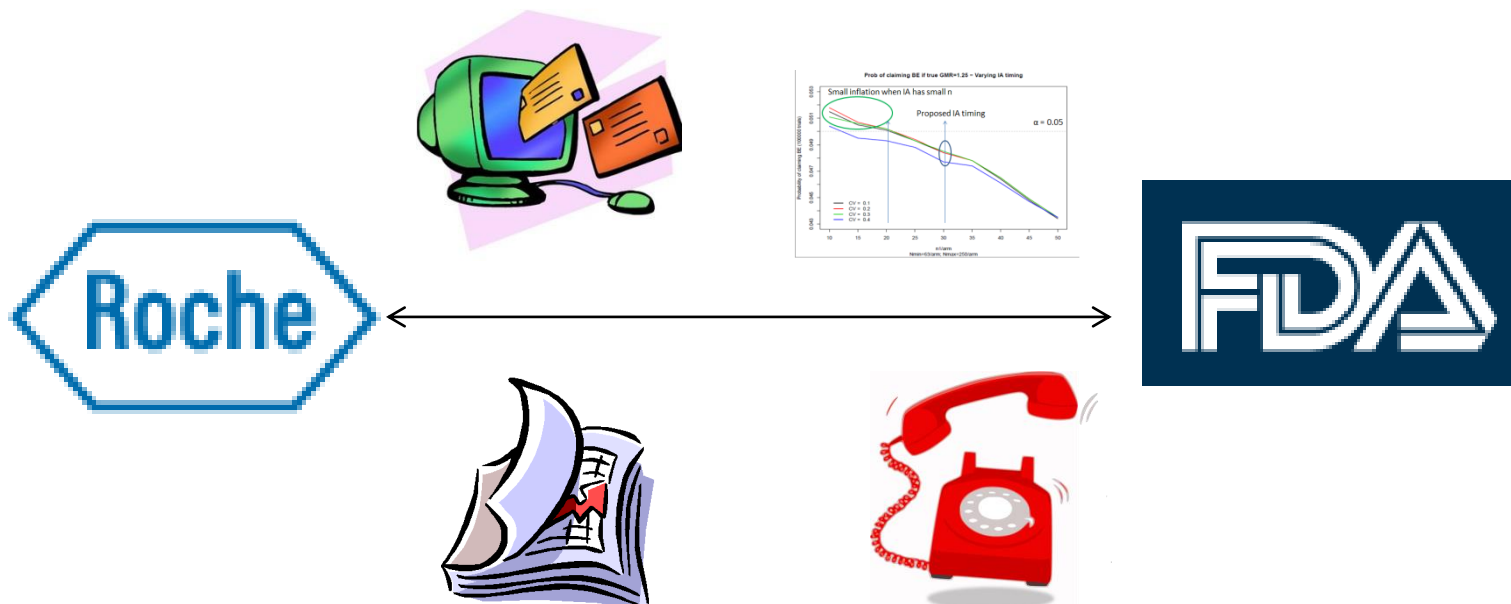
# Rational for Interim Analysis



- Allow team to get a accurate estimate of GMR and CV assumptions and adjust the sample size if required
- IA study design had been conducted in other disease areas within Roche
- Timelines
- Adjustment was not made for Type I error due to BE not being assessed at the IA
  - EMEA 2012 paper discussing the revised EMA guideline (EMA author):  
*“The plan to spend alpha must be pre-defined in the protocol. [...]. It is also possible to distribute the alpha differently, and as an extreme case, **it is acceptable to plan no alpha expenditure in the interim analysis when it is designed to obtain information on formulation differences and intra-subject variability and 90% CI are not estimated at the interim stage.**”*
- FDA – no guidance on SSR for BE studies.
- Plan to keep the design straightforward

# Interactions with FDA

Roche



## Conclusion

Post TC with FDA, team needed to either revise analysis plan adjusting test statistic/alpha levels, or provide a theoretical argument for not performing a type I error or test statistic adjustment (i.e. simulations alone not accepted by the FDA).

# Revised SSR Study Design Options\*



Design	1	2	3	4
Power Method	Conditional Power (CP)		Unconditional Power (UCP)	
Adjustment	Adjusted	Unadjusted	Adjusted	Unadjusted
Confidence Interval Method	Exact 2-stage based	Standard	Exact 2-stage based	Standard

- CP method allows the probability to reject  $H_0$  given the stage 1 data and this is based on Promising Zone approach.
- UCP method, allowed the sample size to be re-estimated based on assumptions from stage 1 and assuming set power e.g 80%.
- The two methods allowing for adjustment use adjusted CI to control type I error
- An equivalent 90% confidence interval with 'adjusted' confidence bounds was derived, which can be used in the usual way to assess the BE criteria for AUC/Cmax.

\*in collaboration with Cytel, Cambridge USA

# The 'Promising Zone' Approach for SSR



Method first described by Mehta and Pocock (2011):

**Option 1:** If the conditional power (CP) falls below a predefined boundary  $CP_{\min}$ , then the interim results are considered unfavorable and study continues with the originally planned second stage sample size

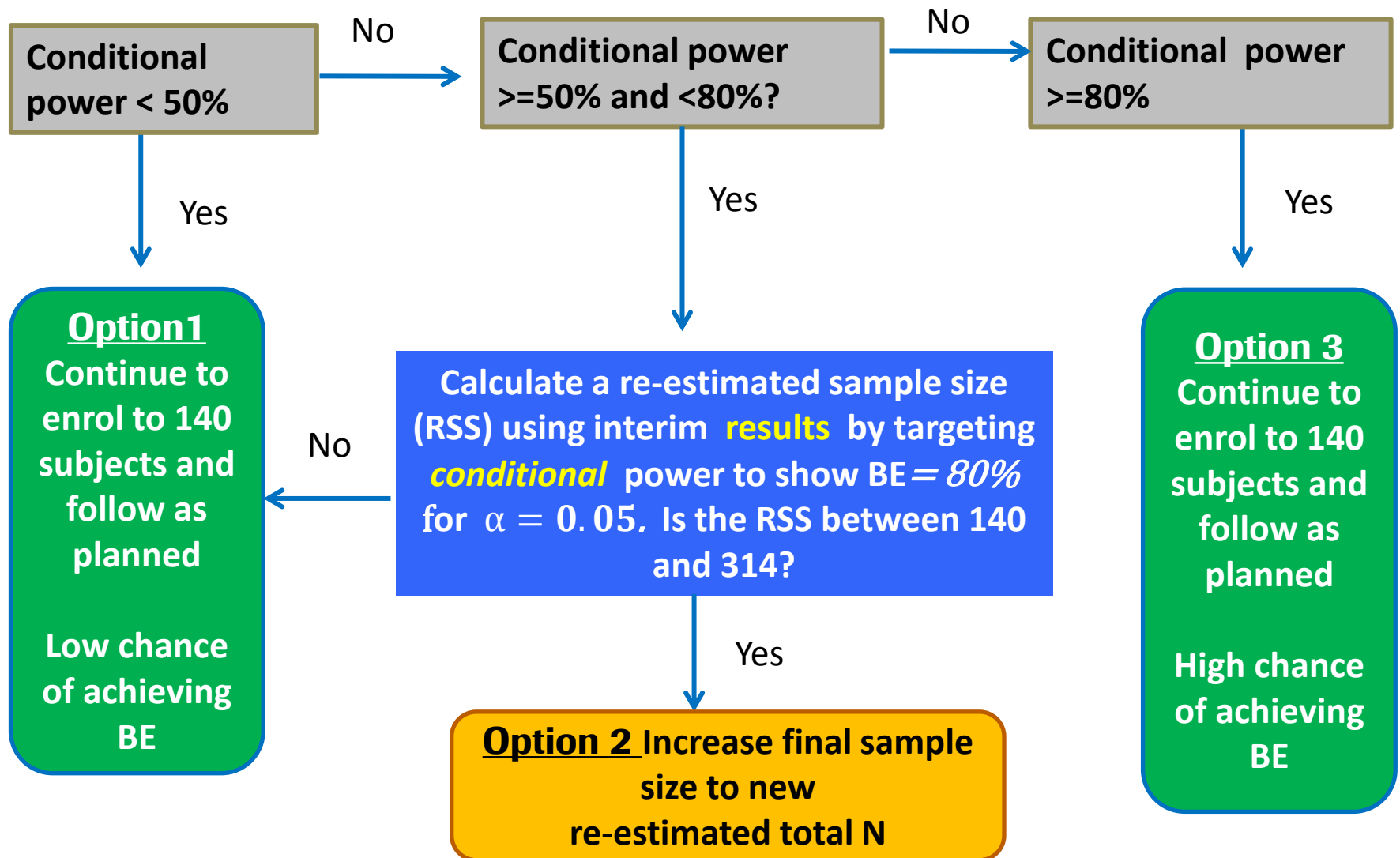
**Option 2:** If  $CP \geq CP_{\min}$  but  $\leq$  the planned power  $1 - \beta$ , then the results are seen as promising. For these interim results, the sample size for the second stage is increased such that  $CP \geq 1 - \beta$ .

**Option 3:** If the conditional power is  $\geq 1 - \beta$ , the results are seen as favorable and the originally planned second stage sample size is maintained.

It's been previously shown (Chen et al) that type I error is not increased if  $CP_{\min} \geq 50\%$

# Updated Proposed Two Stage BE Study Design

Roche



Note: the 50-80% range is also called a 'promising zone' for CP

CP Min = 50%,  $1-\beta=80\%$

# Testing for Bio-equivalence



- Following the SSR step stage 2 of the study is completed and stage 1 and stage 2 data is combined to test for bio-equivalence between the two devices for the two PK parameters Cmax and AUClast
- PK parameters  $\log(\text{Cmax})$  and  $\log(\text{AUClast})$  assumed to be independent and normally distributed
- For Bioequivalence test two null hypotheses and one alternative hypothesis where  $\delta_L = \log(0.8)$  &  $\delta_U = \log(1.25)$  and  $\alpha = 5\%$ 
  - $H_0: \delta \leq \delta_L \text{ or } \delta \geq \delta_U$  against  $H_a: \delta_L < \delta < \delta_U$
- Alternatively this testing can be done as two one-sided non-inferiority tests
  - $H_{01}: \delta \leq \delta_L$  against  $H_{a1}: \delta > \delta_L$
  - $H_{02}: \delta \geq \delta_U$  against  $H_{a2}: \delta < \delta_U$

For each one-sided test a separate test statistic is defined

# CHW Test Statistic



- Cui-Hung-Wang (CHW) approach defines a weighted statistic ( $Z^*$ ), data from the 2-stages by weighing the stage wise Wald test statistics:
- Wald Test Statistic is defined as

$$\text{Stage 1: } Z_{1,L} = (\hat{\delta}_1 - \delta_L) / \text{SE}(\hat{\delta}_1), \quad Z_{1,U} = (\hat{\delta}_1 - \delta_U) / \text{SE}(\hat{\delta}_1)$$

$$\text{Stage 2: } Z_{2,L} = (\hat{\delta}_2 - \delta_L) / \text{SE}(\hat{\delta}_2) \quad Z_{2,U} = (\hat{\delta}_2 - \delta_U) / \text{SE}(\hat{\delta}_2),$$

where  $\hat{\delta}_1$  = difference in group means in stage 1,  $\hat{\delta}_2$  = difference in group means in stage 2, and  $\text{SE}(\hat{\delta}_1)$  and  $\text{SE}(\hat{\delta}_2)$  are the corresponding standard errors for each stage

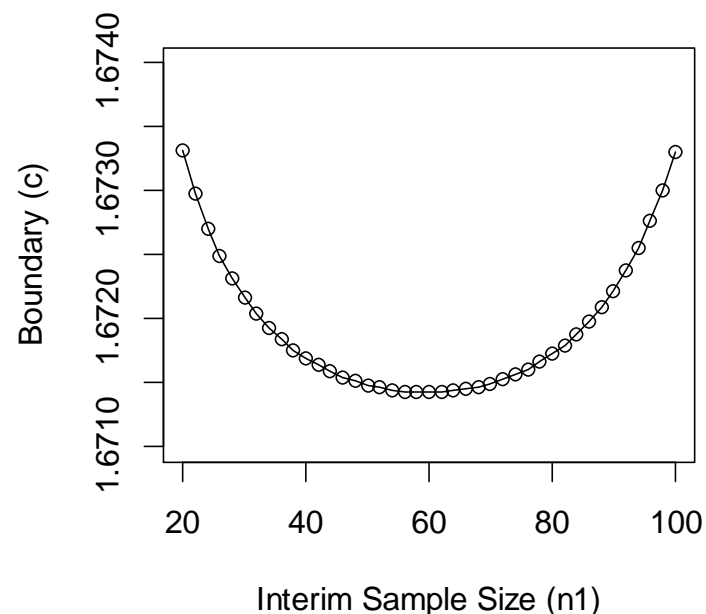
- The CHW statistic combines the two stages statistics together and applies the weighting

$$Z_L^* = \sqrt{W_1} Z_{1,L} + \sqrt{W_2} Z_{2,L} \quad \text{and} \quad Z_U^* = \sqrt{W_1} Z_{1,U} + \sqrt{W_2} Z_{2,U}$$

# Adjusted Critical Values and Adjusted CI



- Calculated adjusted critical values ( $c$ ) based on the t-distribution (to avoid type I error inflation due to small sample sizes) depend only on  $n_1$ ,  $n_2$ ,  $N_{\max}$  and  $\alpha$ .
- An adjusted two-sided CI,  $(C_L, C_U)$ , replacing the conventional 90% CI, and can be defined equivalent to the pair of adjusted tests, which was shown to have expected coverage, i.e.  $\text{Prob}(C_L < \delta < C_U) \geq 1 - 2\alpha$ .
- BE would be claimed if both  $Z_L^* > c$  and  $Z_U^* < -c$  or equivalently, if  $(C_L, C_U)$  is completely contained in the (0.8, 1.25) bioequivalence range.
- Figure illustrates calculated critical values for  $n_1 = 20 - 100$ ,  $n_2 = 126 - n_1$ ,  $N_{\max} = 286$ ,  $\alpha = 0.05$



$n_1$  = sample size stage 1  
 $n_2$  = planned sample size stage 2  
 $N_{\max}$  = actual sample size of stage 2

# Summary

- Team revised the study design to use a method for analysing the stage 1 and stage 2 data which would not inflate type I error
- Type I error is built into an adjustment in the 90% Confidence Intervals around the parameter estimates (via adjusted critical values for combined stage 1 and 2 test statistics)
- Team submitted the revised study design 1 to the FDA which provided a proof for control of the type 1 error using the t-distribution

Design	1	2	3	4
Power Method	Conditional Power (CP)		Unconditional Power (UCP)	
Adjustment	Adjusted	Unadjusted	Adjusted	Unadjusted
Confidence Interval Method	Exact 2-stage based	Standard	Exact 2-stage based	Standard

# Follow-up with FDA

- Did the FDA support the use of the revised study design allowing control for type I error?



# Follow-up with FDA

- Did the FDA support the use of the revised study design allowing control for type I error?



- *FDA acknowledge the statistical approach adequately addressed the control of type 1 error.*
- *However, as a matter of regulatory policy, we have not accepted the use of such an approach in support of bioequivalence/comparability studies. Implementing your proposed approach will constitute establishing a new policy for which we are required to follow proper procedures.*

# References

- Hsiao.S, Lingyun.L (2016). Unblinded Sample Size Re-Estimation in Bioequivalence Trials with Small Sample Sizes: Joint Statistical Meeting July 30-Aug 4, Chicago
- Mehta CR, Pocock SJ (2011). Adaptive increase in sample size when interim results are promising: A practical guide with examples. *Statistics in Medicine*, **30**:3267–3284
- Chen, Y. H. J., DeMets, D. L. and Gordon Lan, K. K. (2004), Increasing the sample size when the unblinded interim result is promising. *Statist. Med.*, 23: 1023–1038.

*Doing now what patients need next*