The PRO Consortium: An FDA-Endorsed Process for PRO Instrument Development in GI Disorders and Beyond

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Presented at:
Digestive Disease Week ■ May 7, 2011 ■ Chicago, IL

Critical Path Institute (C-Path)

PRO CONSORTIUM
CRITICAL PATH INSTITUTE

- Established in 2005 by the University of Arizona and the FDA
- An independent, non-profit organization
- Dedicated to implementing FDA's Critical Path Initiative (CPI)

  CPI is FDA’s national strategy for transforming the way FDA-regulated products are developed, evaluated, manufactured, and used.

C-Path

Provides a neutral forum for collaboration aimed at accelerated development of safe and effective new medical products

C-Path's Consortia

- Coalition Against Major Diseases (CAMD)
- Critical Path to TB Drug Regimens (CPTR)
- Predictive Safety Testing Consortium (PSTC)
- Polycystic Kidney Disease (PKD) Consortium
- Patient-Reported Outcome (PRO) Consortium

PRO Consortium

Formed in late 2008 by C-Path, in cooperation with the FDA and the pharmaceutical industry

Membership

Only available to medical product companies

Non-Voting Participants

- Representatives of governmental agencies
- Clinical consultants, patient advocates, academic researchers, and CROs partnering in the development of the PRO instruments

PRO Consortium

Membership Fees

- Used for
  - Meeting and teleconference costs
  - Legal/IP expenses
  - Data storage and maintenance
- Not used for
  - Salaries for C-Path personnel
  - C-Path operations/management
  - PRO instrument development costs

Goals of PRO Consortium

- Enable pre-competitive collaboration that includes FDA input/expertise
- Avoid development of multiple PRO instruments for same purpose
- Share costs of developing new PRO instruments
- Develop qualified, publicly available PRO instruments
- Facilitate FDA's review of medical products by standardizing PRO endpoints

Members

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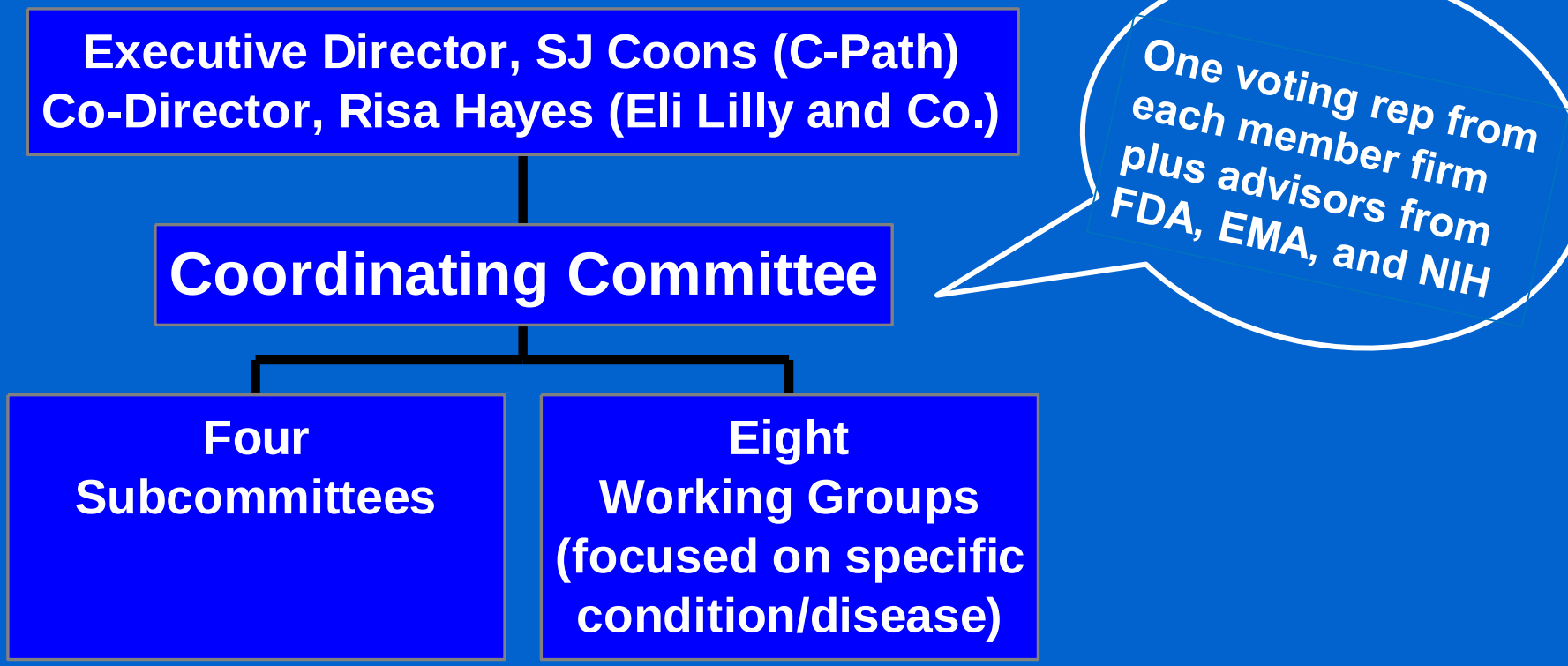
Abbott
Actelion Pharmaceuticals
Allergan
Amgen
Astellas Pharma
AstraZeneca
Boehringer Ingelheim
Bristol-Myers Squibb
Daiichi Sankyo
Eisai
Eli Lilly & Company
Forest Laboratories
GlaxoSmithKline
Ironwood Pharmaceuticals
Johnson & Johnson
Merck Sharp & Dohme Corp.
Novartis
Novo Nordisk
Pfizer
Roche
sanofi-aventis
Shire
Sunovion
Takeda Pharmaceuticals
UCB

PRO Consortium Organizational Chart



Over 150 scientists and/or clinicians participate

Objective of Working Groups

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To develop a PRO instrument that can be “qualified” by the FDA for use as a primary or key secondary efficacy endpoint in clinical trials for the target disease/condition

Guidance for Industry

Qualification Process for Drug Development Tools

DRAFT GUIDANCE

This guidance document is being distributed 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 comments to the Division of Dockets Management (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 (CDER) Shaniece Gathers, 301-796-2600.

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

October 2010
Clinical/Medical

Qualification

Qualification is a formal conclusion by the FDA that the results obtained from the PRO instrument within a stated context of use can be relied upon to measure important aspects of clinical benefit and can be used as the basis of medical product approval and labeling claims.

Path to Qualification of a New PRO Instrument

Feasibility Document

Scoping Stage Summary Document

- Proposed target population, concepts, conceptual framework, labeling language, and endpoint model (showing endpoint hierarchy)

Qualitative Research Summary Document:

- Evidence that supports the content validity of draft PRO measure, including confirmation or revision of the proposed conceptual framework

Quantitative Research Summary Document:

- Evidence supporting other measurement properties (e.g., reliability, construct validity, responsiveness) of final PRO instrument, along with user manual, and other documentation

Qualification Dossier

Working Groups: Position on Path to Qualification

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On Hold

- Breast Cancer WG

Scoping Stage

- Functional Dyspepsia WG
- Rheumatoid Arthritis WG
- Lung Cancer WG

Vendor Selection Stage (prior to qualitative research)

- Asthma WG
- Depression WG

Qualitative Research Stage

- Irritable Bowel Syndrome WG
- Cognition (mild cognitive impairment) WG

Irritable Bowel Syndrome Working Group

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Company/Organization	
CO-CHAIRS	
Takeda Pharmaceuticals	Charles Baum, MD
Ironwood Pharmaceuticals	Mollie Baird, MPH
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Ironwood Pharmaceuticals	Jeffrey Johnston, MD
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UCLA	Brennan Spiegel, MD

Functional Dyspepsia Working Group

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Forest Research Institute	Steven Shiff, MD
Ironwood Pharmaceuticals	Jeffrey Johnston, MD

Challenges

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- Gaining consensus regarding target concept(s) and conceptual framework
- Retaining focus on symptoms and signs
- Maintaining patience during FDA review of submitted documents
- Juggling different budget periods/fiscal years across multi-company projects
- Instrument development and qualification is anticipated to take three to five years

Summary

- A process for collaborative, pre-competitive PRO instrument development has been established in a neutral environment
- The FDA has agreed to a review structure for developmental milestone documents
- The process will be refined and improved as we learn what works and what doesn't
- The PRO Consortium approach has substantial benefits as well as challenges