# CLL11 – a trial tailored to answer questions from many stakeholders efficiently

Kaspar Rufibach EFSPI regulatory statistics workshop 2024, Basel



# Every successful drug development program has many parents.

Gabi Bieska, Elina Asikanius, Uli Burger, Jörg Maurer.

I have not been involved in the design and running of this trial!

Who can we convince once the data is in?

Regulators are not the only stakeholder.

**CLL11** was a platform trial!

Closed testing efficient for multiarm trials.

You need good drug developers!

### **Impact**

Approval and reimbursement of GAZYVA in chronic lymphocytic leukemia (CLL).

1st Breakthrough Therapy-designated drug to receive FDA approval, Lee et al. (2014).

Clinical publication: Goede et al. (2014).

Statistical publication: Asikanius et al. (2016). Simulation code as supplementary material.

# No impact:

More frequent use of closed testing in multiarm trials.

### Context at design stage

# **Chlorambucil**

approved standard in Germany (only!)

# CI + MabThera

1st generation anti-CD20, not approved, off-label use

# CI + Gazyva

2nd generation anti-CD20, experimental

### 2-arm trial G vs. C:

Regulator ©
Patients ©
Scientific community / treating physicians ©
HTA ®

How to efficiently design a 3-arm trial?

# Null hypotheses and type I error protection

### Pairwise null hypotheses:

$$H_{0,G \text{ vs. } C}$$
 :  $HR_{G/C} = 1$ ,

$$H_{0,R \ vs. \ C}$$
 :  $HR_{R/C}$  = 1,

$$H_{0,G \text{ vs. R}}$$
 :  $HR_{G/R} = 1$ .

### All hypotheses of interest.

Design must strongly protect familywise error rate (FWER).

Primary endpoint: progression-free survival.

# **Closed testing:**

General principle to construct testing strategy that protects FWER.

$$\begin{array}{c} \boxed{H_{0,\text{G vs. C}}: \operatorname{HR}_{\text{G/C}} \ = \ 1} \\ \boxed{H_{0,\text{R vs. C}}: \operatorname{HR}_{\text{R/C}} \ = \ 1} \\ \boxed{H_{0,\text{G vs. R}}: \operatorname{HR}_{\text{G/R}} \ = \ 1} \\ \boxed{H_{0,\text{G vs. C}} \cap H_{0,\text{G vs. C}} \cap H_{0,\text{G vs. C}}} \\ \boxed{\uparrow} \\ \boxed{H_{0,\text{global}}: \operatorname{HR}_{\text{G/C}} \ = \ \operatorname{HR}_{\text{R/C}} = \ \operatorname{HR}_{\text{R/G}} \ = \ 1} \\ \end{array}$$

Reject  $H_{0,global}$  at  $\alpha \Rightarrow$  each individual hypothesis can be tested at  $\alpha$ .

If you have enough power to test  $H_{0,global}$  – virtually free lunch!

# **Assumptions**

Global significance level:  $\alpha = 0.05$ .

Alternative hypotheses and power for sample size planning:

- 98% power to detect  $HR_{G/C} = 0.444$ ,
- 80% power to detect  $HR_{R/C} = 0.600$ ,
- 80% power to detect  $HR_{G/R} = 0.741$ .

### Why 98%?

- Futility and efficacy interim for R vs. C at final analysis of G vs. C  $\Rightarrow$  30% adequate information fraction to perform interim at.
- Enough safety follow up for C for benefit-risk.
- Randomization to arm G expected to have terminated at G vs. C analysis cutoff.

### Four potential strategies

- Three separate trials:
  - Each at  $\alpha = 0.05$ .
  - Distribute patients on three trials 

    use each patient for one comparison only.
- One 3-arm trial with Bonferroni correction:
  - Each comparison at  $\alpha = 0.0167$ .
  - All patients in same trial ⇒ use each patient for two comparisons.
- One 3-arm trial with closed testing, wait until last comparison mature:
  - Test  $H_{0,global}$  once targeted number of events for latest comparison reached.
- One 3-arm trial with closed testing, each comparions analyzed once mature:
  - Test  $H_{0,global}$  once targeted number of events for first comparison is reached.
  - Perform other pairwise comparisons once targeted number of events reached.

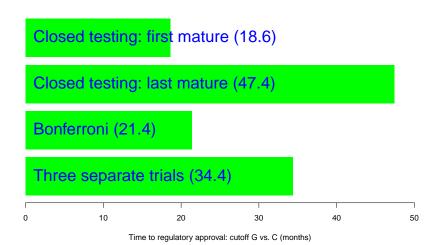
### **Metrics**

- Time to regulatory approval of Gazyva: determined by first cutoff G vs. C.
- Time to make patients / scientific community / HTA happy: determined by cutoff G vs. R.

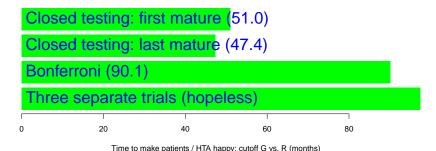
#### Consideration:

 Closed test in Strategies 3 and 4 induces power loss for each pairwise comparison. Quantify power loss, mainly for G vs. R.

# Time to regulatory approval for Gazyva



# Time to make patients / HTA happy



### Closed testing, first mature:

- Slight power loss (1.7%) compared to 2-arm trial for G vs. R comparison due to global test.
- Compensate through 17 more events.
- Corresponds to 3.8 months delay compared to 2-arm trial.

G vs. R stopped at interim analysis for efficacy.

# To pull this off you need good drug developers!

	A vs. C C: N = 238 / A: N = 118	A vs. B B: N = 233 / A: N = 118	B vs. C <sup>2</sup> C: N = 333 / B: N = 330			
	Global test of closed testing procedure*					
July 2012	A vs. C primary analysis 105 events (100%) HR = 0.44 Median PFS: 27 vs. 12 months Significance level: 0.05		B vs. C futility / efficacy interim analysis 125 events (31%) futile if HR > 0.88 Non-binding			
August 2012		A vs. B primary analysis 145 events (100%) HR = 0.60 Median PFS: 20 vs. 12 months Significance level: 0.05				
May 2013	A vs. C updated analysis <sup>1</sup>	A vs. B updated analysis <sup>1</sup>	B vs. C efficacy interim analysis 300 events (74%) Significance level: 0.019			
NA <sup>3</sup>			B vs. C final analysis 406 events (100%) Significance level: 0.044			

# Operational aspects in CLL11

### Operational bias:

- Hazard ratios became known over time:  $\mathrm{HR}_{G/R} = \mathrm{HR}_{G/C}/\mathrm{HR}_{R/C}!$  (under some assumptions).
- Treatment schedule in CLL11 rather fixed once started.
- Define analysis timepoints not only through PFS cutoffs: e.g. all patients needed to be randomized to G prior to cutoff for G vs. C.

### Further operational aspects:

- Multiple final / interim analyses on different sets of patients.
- iDMC for interim analyses in G vs. R.
- Independent response review: even more important after G vs. C was unblinded.

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Regulators are not the only stakeholder.

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# Thank you for your attention.

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Slides can be downloaded on www.kasparrufibach.ch

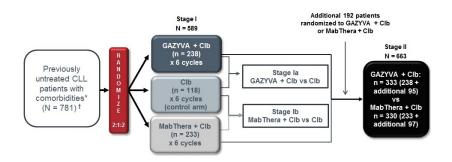
### References I

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# **Backup**

# CLL11 design

Primary endpoint: progression-free survival (PFS).



# **Assumptions**

Global significance level:  $\alpha = 0.05$ .

#### Assumed effect sizes:

- $HR_{G/C} = 12/27 = 0.444$ ,
- $HR_{R/C} = 12/20 = 0.600$ ,
- $HR_{G/R} = 20/27 = 0.741$ .

### Assumptions:

- n = 640 patients in each strategy.
- Randomize 1:2:2.
- 20pts/m for 2m, 40pts/m for 15m.

### Methods

### Strategies 1, 2:

- Compute number of necessary events.
- Compute cutoffs for analyses based on that.

### Strategies 3, 4:

- Unadjusted analysis: Compute number of necessary events and cutoff.
- Adjusted analysis: Global test gates pairwise tests. Increase number of necessary events from unadjusted analysis until simulations (10<sup>6</sup> runs) yield targeted power.

# Time to regulatory approval for Gazyva

	G vs. C: 0.444	R vs. C: 0.600	G vs. R: 0.741
Three separate trials	34.4	39.2	hopeless
Bonferroni	21.4	24.3	90.1
Closed testing – last mature	47.4	47.4	47.4
Closed testing – first mature	18.6	19.4	51.0

# Time to make patients / HTA happy

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Closed testing – last mature	47.4	47.4	47.4
Closed testing – first mature	18.6	19.4	51.0

#### Last scenario:

- Slight power loss (1.7%) compared to 2-arm trial for G vs. R comparison due to global test.
- Compensate through 17 more events.
- Corresponds to 3.8 months delay compared to 2-arm trial.

G vs. R stopped at interim analysis for efficacy.

# **Analysis cutoffs**

			G vs. C	R vs. C	G vs. R
Hazard ratio			0.444	0.600	0.741
Strategy 1:		computed #required events	111	136	349
Three separate trials		computed cutoff (months)	34.4	39.2	-
Strategy 2:		computed #required events	136	181	465
3-arm with Bonferroni		computed cutoff (months)	21.4	24.3	90.1
Strategy 3:	unadj.	computed #required events	275	303	349
3-arm with		computed cutoff (months)	47.2	47.2	47.2
closed testing	adj.	ass. (G vs. R)/resulting (R/G vs. C) #events	276	303	350
		cutoff (months) corresponding to #events	47.4	47.4	47.4
Strategy 4:	unadj.	computed #required events	111	136	349
3-arm with		computed cutoff (months)	18.6	19.4	47.2
closed testing	adj.	assumed #required events	111	136	366
		cutoff (months) corresponding to #events	18.6	19.4	51.0
	power	simulated power corresponding to #events	0.974	0.807	0.800
		simulated unadj. power corresp. to #events	0.988	0.809	0.817

### Patients for each comparison:

- Strategy 1: 64/128; 64/128; 128/128.
- Strategies 2-4: 128/256; 128/256; 256/256.

### Results - power loss

### Detailed results in backups.

	•		G vs. C	R vs. C	G vs. R
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### Patients for each comparison:

- Strategy 1: 64/128; 64/128; 128/128.
- Strategies 2-4: 128/256; 128/256; 256/256.

### **Results**

Results: with CLL11 strategy,

- save between  $\sim$  3m and  $\sim$  29m to first cutoff,
- $\sim 2\%$  power loss for G vs. R, corresponding to 17 events or  $\sim 4$ m.

Explore strategy based on closed testing in multi-arm trials.

Paper compares strategies with respect to

- operational complexity,
- operational bias,
- difficulty of inference in pairwise comparisons,
- type I error protection for secondary endpoints.
- Sensitivity analysis: CLL11 assumed quite large effect sizes. Strategy also feasible for smaller effect sizes?

# Operational aspects in CLL11

Operational bias: Information from ongoing CT causes changes to participant pool, investigator or patient behavior, or other clinical aspects that affect conduct such that conclusions about efficacy or safety are impacted by differences in data collected post public availability of interim results.

#### CLL11:

- G vs. C became available guickly.
- Treatment schedule in CLI 11 rather fixed once started.
- Define analysis timepoints not only through PFS cutoffs: e.g. all patients needed to be randomized to G prior to cutoff for G vs. C.

#### Further operational aspects:

- Multiple final / interim analyses on different sets of patients.
- iDMC for interim analyses in G vs. R.
- Independent response review: even more important after G vs. C was unblinded.

R version and packages used to generate these slides:

R version: R version 4.4.1 (2024-06-14 ucrt) Base packages: stats / graphics / grDevices / utils / datasets / methods / base Other packages: reporttools / xtable

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