

Dose Finding Under Model Uncertainty with the MCP-Mod Approach

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BASS XXVIII – Virtual – October 25, 2021

Outline

- Motivation
- MCP-Mod approach
 - Independent and normally distributed data
 - More general data distributions
- Summary

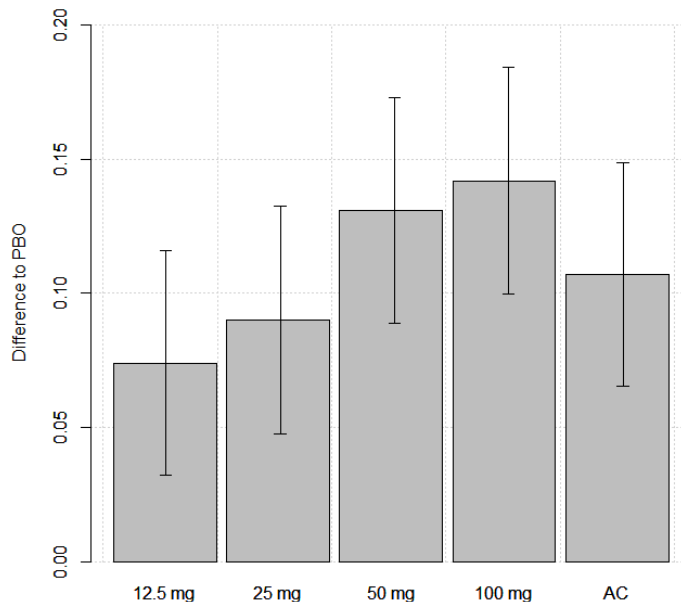
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Need to Improve Dose Finding in Phase II

Pairwise comparisons

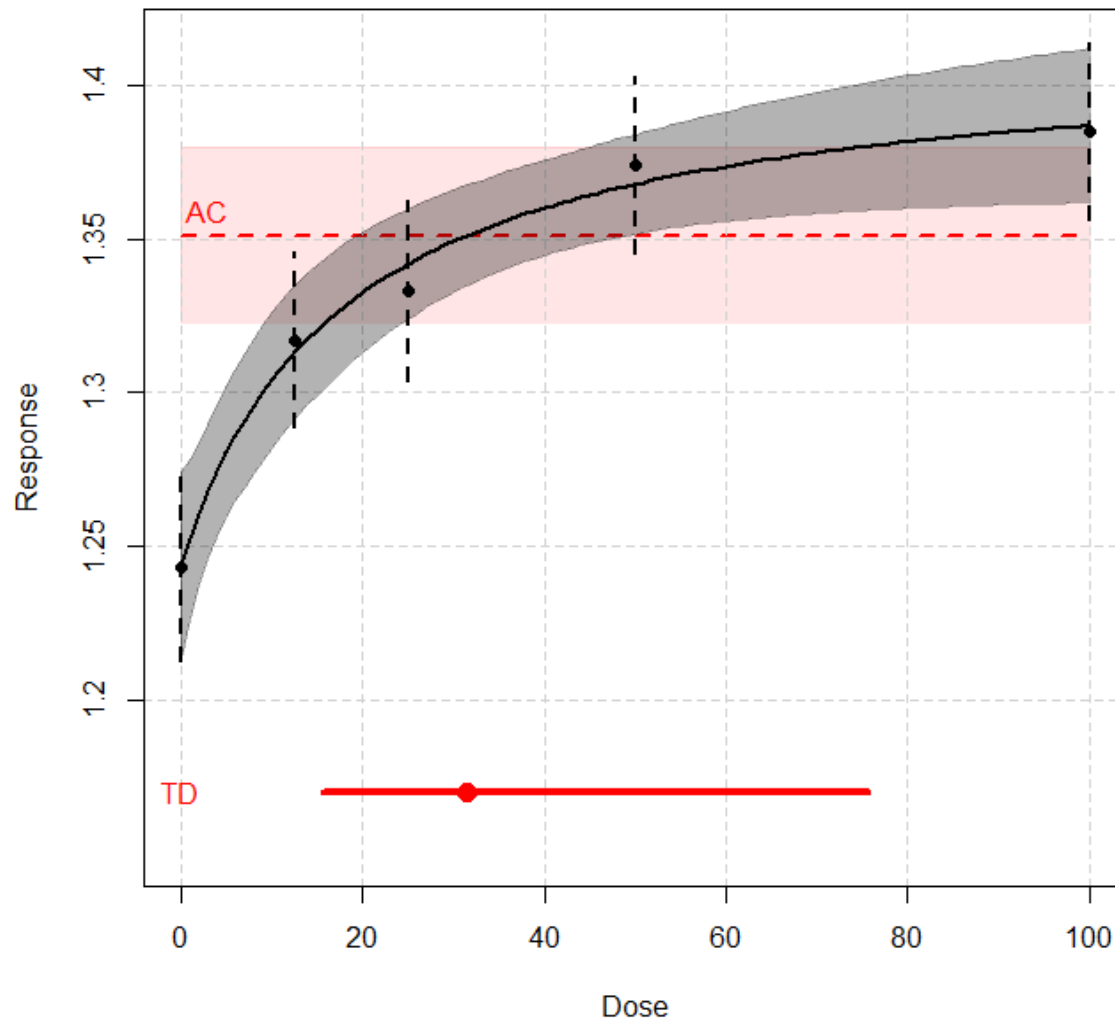
- Mismatch between real study objectives and objectives in protocol
 - Statistical objectives in protocol
 - Testing hypotheses: control versus active doses
 - Study design determined by this objective (sample size, number of doses, ...)
 - Output of a pairwise analysis



- Conclusion
 - All active doses (and the active comparator, AC) are significantly different from placebo
- What happens inbetween observed doses? What is the shape of the dose-response curve?
- Which doses give similar efficacy as the AC?

Need to Improve Dose Finding in Phase II

Model-based analyses



- Modelling provides more information
 - Smoothes dose estimates
 - Interpolation between doses
 - Confidence intervals for quantities of interest, e.g. target dose (TD) achieving same effect as AC
- Modelling often only done as supportive analysis
 - Studies not designed for this purpose
- Issues with modelling
 - Pre-specification

Need to Improve Dose Finding in Phase II

Finding the right dose is not that simple

- True underlying dose response profile is typically unknown before and even after completing a dose finding study uncertainty might remain
- Selecting a working model may have a substantial impact on the final dose estimate
- Model selection using observed data needs to account for the inherent uncertainty
 - ➔ Useful to have a unified approach combining the advantages of dose response **signal testing** and **modeling**
 - ➔ **MCP-Mod**: A structured approach to model-based design and analysis of Phase II dose finding studies under model uncertainty

MCP-Mod

Development over the past 14 years

- Selected methodological developments
 - Bretz et al. (2005): normal homoscedastic data, no covariates
 - Pinheiro et al. (2006a): Sample size calculation based on MCP step
 - Dette et al. (2008): Optimal designs for Mod step
 - Bornkamp et al. (2009): Detailed description of MCP-Mod package in R (later converted into DoseFinding package)
 - Bornkamp et al. (2011): Adaptive MCP-Mod with Bayesian elements
 - Pinheiro et al. (2014): General parametric models (non-normal endpoints, non-parallel designs)
 - König et al (2014): Extension of MCP-Mod to confirmatory studies
- Current software implementations
 - DoseFinding package [available on CRAN](#) and [ADDPLAN DF](#) module
- CHMP (2014) [Qualification Opinion](#) and FDA (2016) [Fit-for-Purpose Determination](#) of MCP-Mod

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Example of a Phase IIb Study (biom)

Study design and summary results

- biom example data set from the DoseFinding R package on CRAN
- A randomized double-blind parallel groups trial
- 100 patients allocated equally to either placebo or one of four active doses coded as 0.05, 0.20, 0.60, and 1
- Normally distributed response variable
- Larger responses indicate better outcomes in efficacy

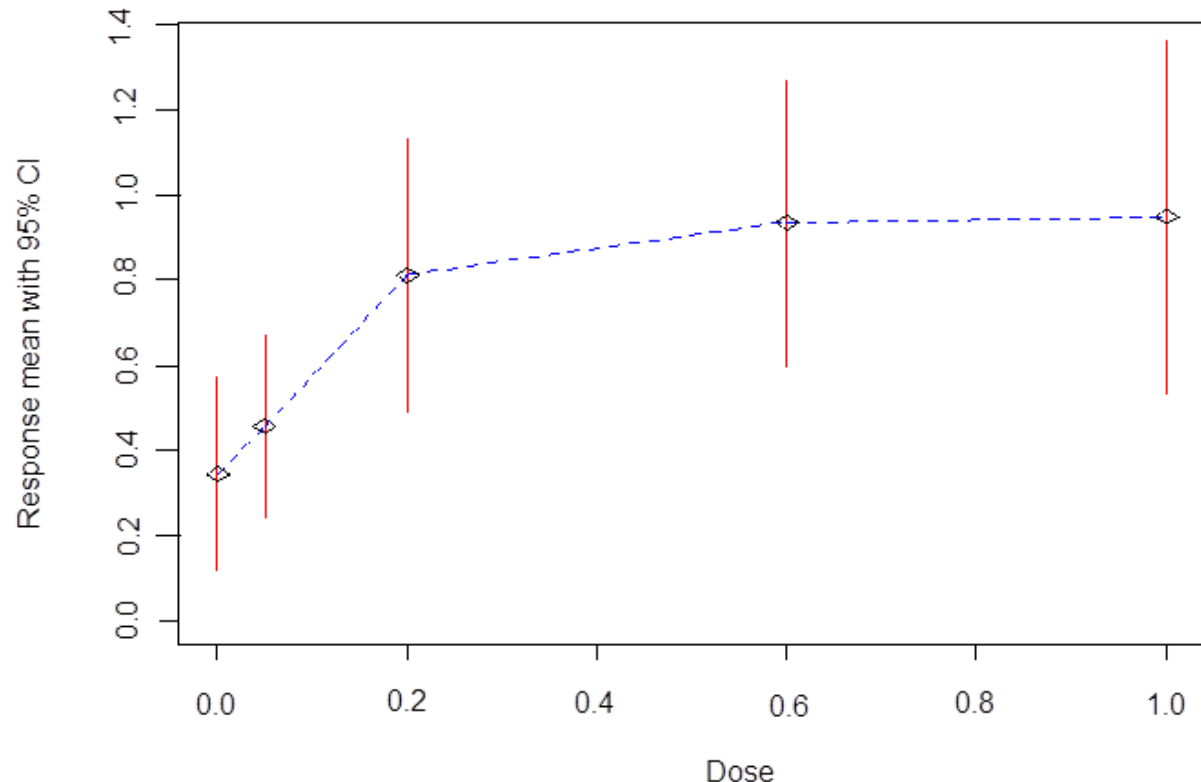
Dose	0	0.05	0.2	0.6	1
Mean	0.345	0.457	0.810	0.934	0.949
95% CI lower bound*	0.118	0.242	0.486	0.599	0.533
95% CI upper bound	0.571	0.672	1.134	1.270	1.364

* CI: confidence interval

Example of a Phase IIb Study (biom)

Mean plot

- Mean response at each dose with 95% CI



- Questions:

- Is there a significant dose response signal?
- What is the underlying dose response relationship?
- What is the minimum effective dose with respect to a target effect?

MCP-Mod

A unified dose finding approach

Trial Design Stage

General design considerations

Determination of suitable study population, endpoints, etc.

Set of candidate models

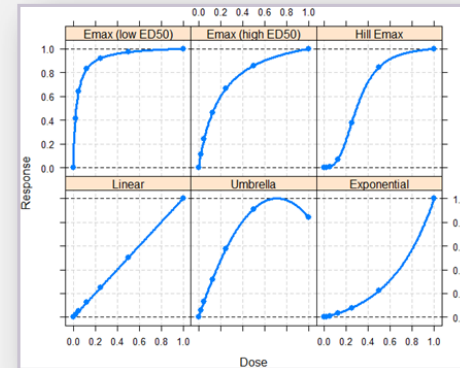
Pre-specification of candidate dose-response models based on available information (similar compounds, mode of action)

Optimal statistical tests

Optimized for candidate dose-response shapes

Design evaluations

Dose determination and sample size calculation to achieve targeted performance characteristics



Trial conduct

$p < \alpha?$

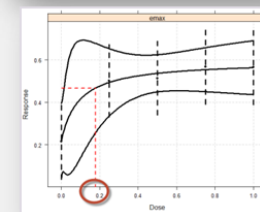
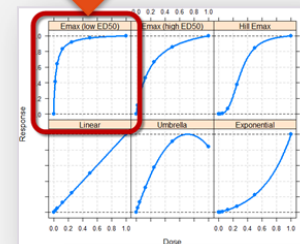
Trial Analysis Stage

MCP step

- Assessment of dose-response signal using contrast tests
- Model selection (or model averaging) out of the set of significant models

Mod step

Dose-response and target dose estimation based on selected model(s)



MCP-Mod

Candidate models

General design considerations

Determination of suitable study population, endpoints, etc.

Set of candidate models

Pre-specification of candidate dose-response models based on available information (similar compounds, mode of action)

- Identify a set of M **parameterized candidate models**

$$f_m(d, \boldsymbol{\theta}_m) = \theta_0 + \theta_1 f_m^0(d, \boldsymbol{\theta}_m^0)$$

together with **pre-specified standardized model parameter values** $\boldsymbol{\theta}_m^0$ for the standardized model $f_m^0(d, \boldsymbol{\theta}^0)$, where $i = 1, \dots, k$ and $m = 1, \dots, M$

- Each model will be tested using a contrast test with optimal contrast coefficients

MCP-Mod

biom example revisited: Candidate models

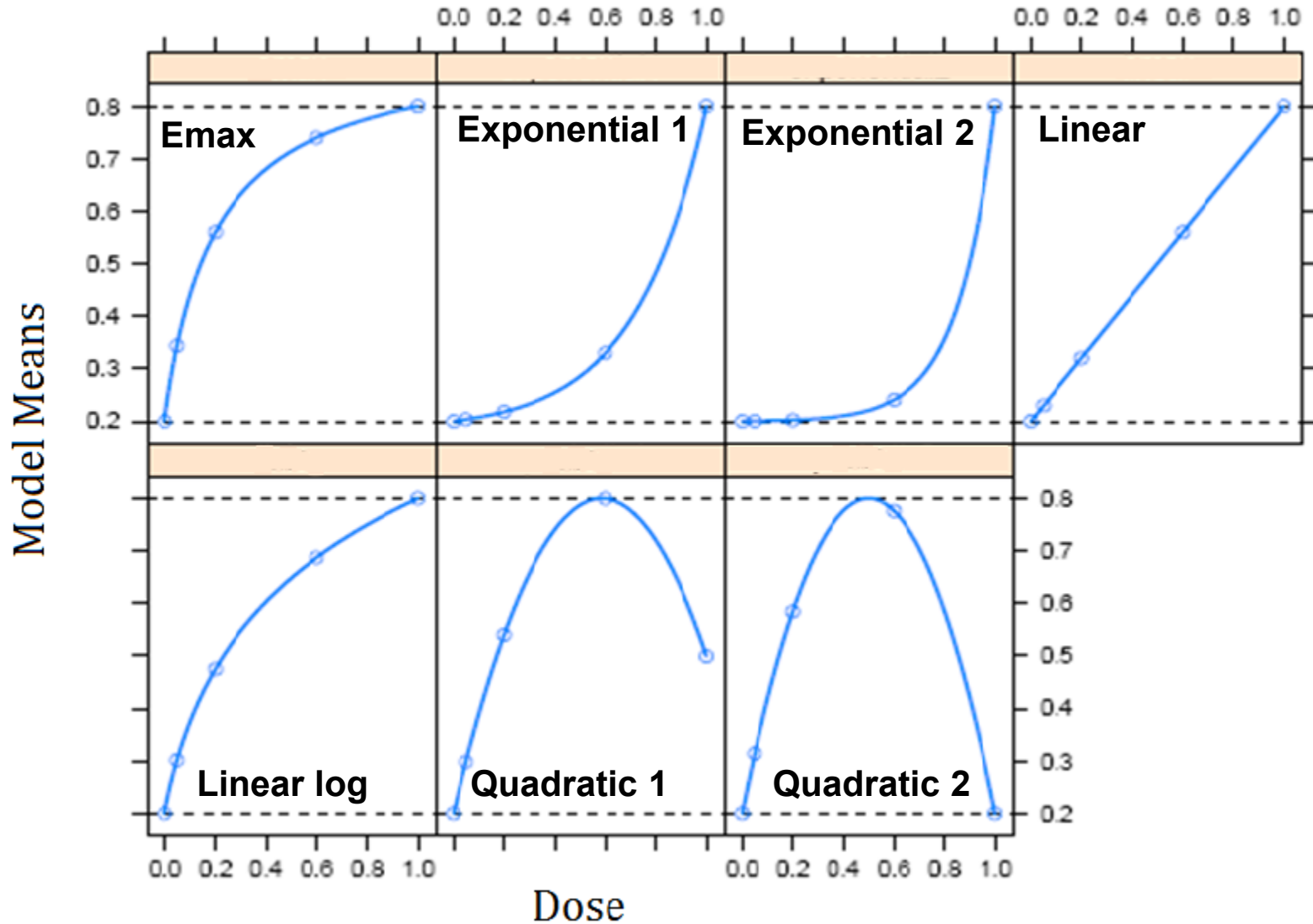
- Selected candidate models

Model	$f(d, \theta)$	$f^0(d, \theta^0)$	Pre-specified θ^0
Linear	$E_0 + \delta d$	d	
E _{max}	$E_0 + E_{\max} d / (ED_{50} + d)$	$d / (ED_{50} + d)$	$ED_{50} = 0.2$
Linear log-dose	$E_0 + \delta \log(d + c)$	$\log(d + c)$	
Exponential 1	$E_0 + E_1 (\exp(d/\delta) - 1)$	$\exp(d/\delta) - 1$	$\delta = 0.279$
Exponential 2	$E_0 + E_1 (\exp(d/\delta) - 1)$	$\exp(d/\delta') - 1$	$\delta' = 0.15$
Quadratic 1	$E_0 + \beta_1 d + \beta_2 d^2$	$d + (\beta_2 / \beta_1) d^2$	$\beta_2 / \beta_1 = -0.854$
Quadratic 2	$E_0 + \beta_1 d + \beta_2 d^2$	$d + (\beta_2' / \beta_1') d^2$	$\beta_2' / \beta_1' = -1$

- The pre-specified standardized model parameters θ^0 are elicited from previous studies, the literature, or discussions with clinical teams

MCP-Mod

biom example revisited: Model shapes





MCP-Mod

Model contrast test statistics

Set of candidate models

Pre-specification of candidate dose-response models based on available information (similar compounds, mode of action)

Optimal statistical tests

Optimized for candidate dose-response shapes

- Construct **multiple contrast tests** to detect a positive dose effect using **optimal coefficients** c_{m1}, \dots, c_{mk} to maximize the test power under model $m = 1, \dots, M$
- In the balanced (equal allocation) case,

$$\begin{pmatrix} c_{m1} \\ \vdots \\ c_{mk} \end{pmatrix} \propto \begin{pmatrix} \mu_{m1} - \bar{\mu}_m \\ \vdots \\ \mu_{mk} - \bar{\mu}_m \end{pmatrix} \propto \begin{pmatrix} \mu_{m1}^0 - \bar{\mu}_m^0 \\ \vdots \\ \mu_{mk}^0 - \bar{\mu}_m^0 \end{pmatrix},$$

where $\mu_{mi} = f_m(d_i, \boldsymbol{\theta}_m)$, $\bar{\mu}_m = N^{-1} \sum_{i=1}^k \mu_{mi}$, $\mu_{mi}^0 = f_m^0(d_i, \boldsymbol{\theta}_m^0)$, $\bar{\mu}_m^0 = N^{-1} \sum_{i=1}^k \mu_{mi}^0$, and N is the total sample size

- The optimal contrast coefficients depend only on the pre-specified standardized model $f_m^0(d, \boldsymbol{\theta}_m^0)$

MCP-Mod

biom example revisited: Optimal contrast coefficients

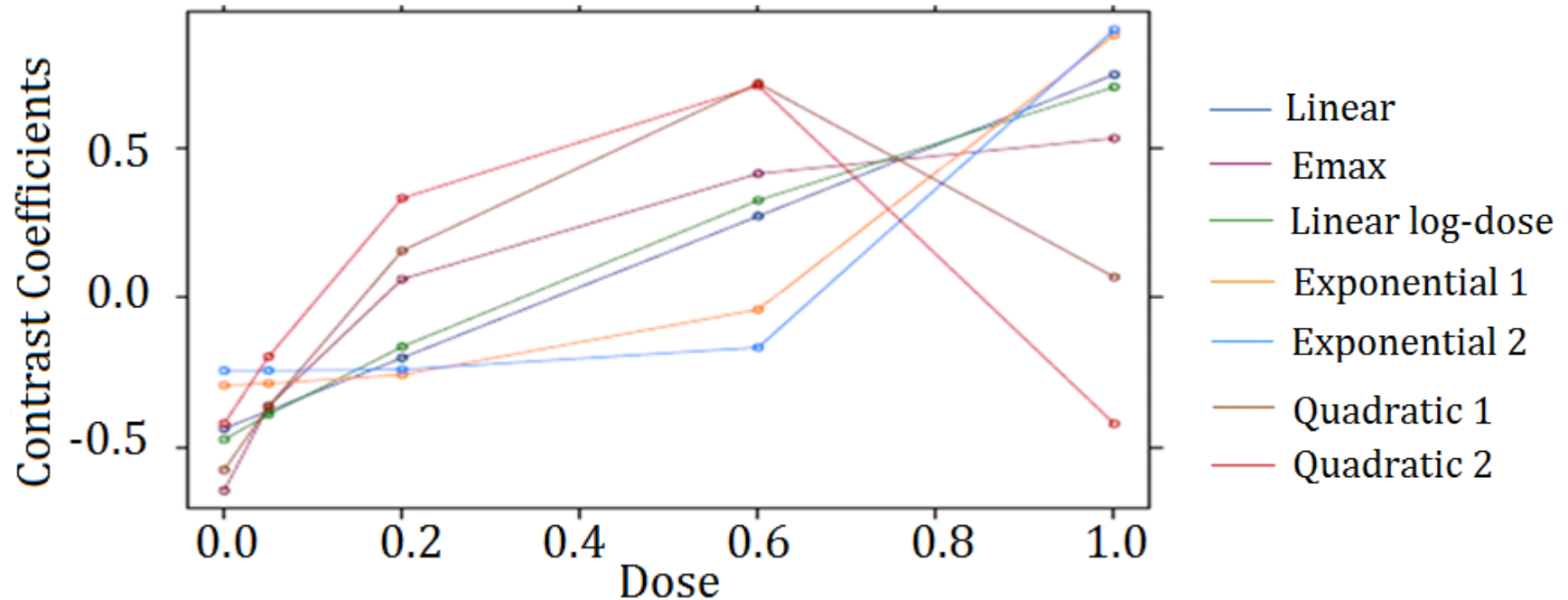
- Optimal coefficients calculated for each candidate model

Model	Dose				
	0	0.05	0.2	0.6	1
Linear	-0.44	-0.38	-0.20	0.27	0.74
E _{max}	-0.64	-0.36	0.06	0.41	0.53
Linear log-dose	-0.47	-0.39	-0.16	0.32	0.70
Exponential 1	-0.29	-0.29	-0.26	-0.04	0.87
Exponential 2	-0.24	-0.24	-0.24	-0.17	0.89
Quadratic 1	-0.57	-0.36	0.16	0.71	0.07
Quadratic 2	-0.42	-0.20	0.33	0.71	-0.42

MCP-Mod

biom example revisited: Graphical display of contrast coefficients

- Plot of optimal contrast coefficients



- The underlying dose response model shapes are well reflected by the optimal contrast shapes

MCP-Mod

Sample size calculation

Optimal statistical tests

Optimized for candidate dose-response shapes

Design evaluations

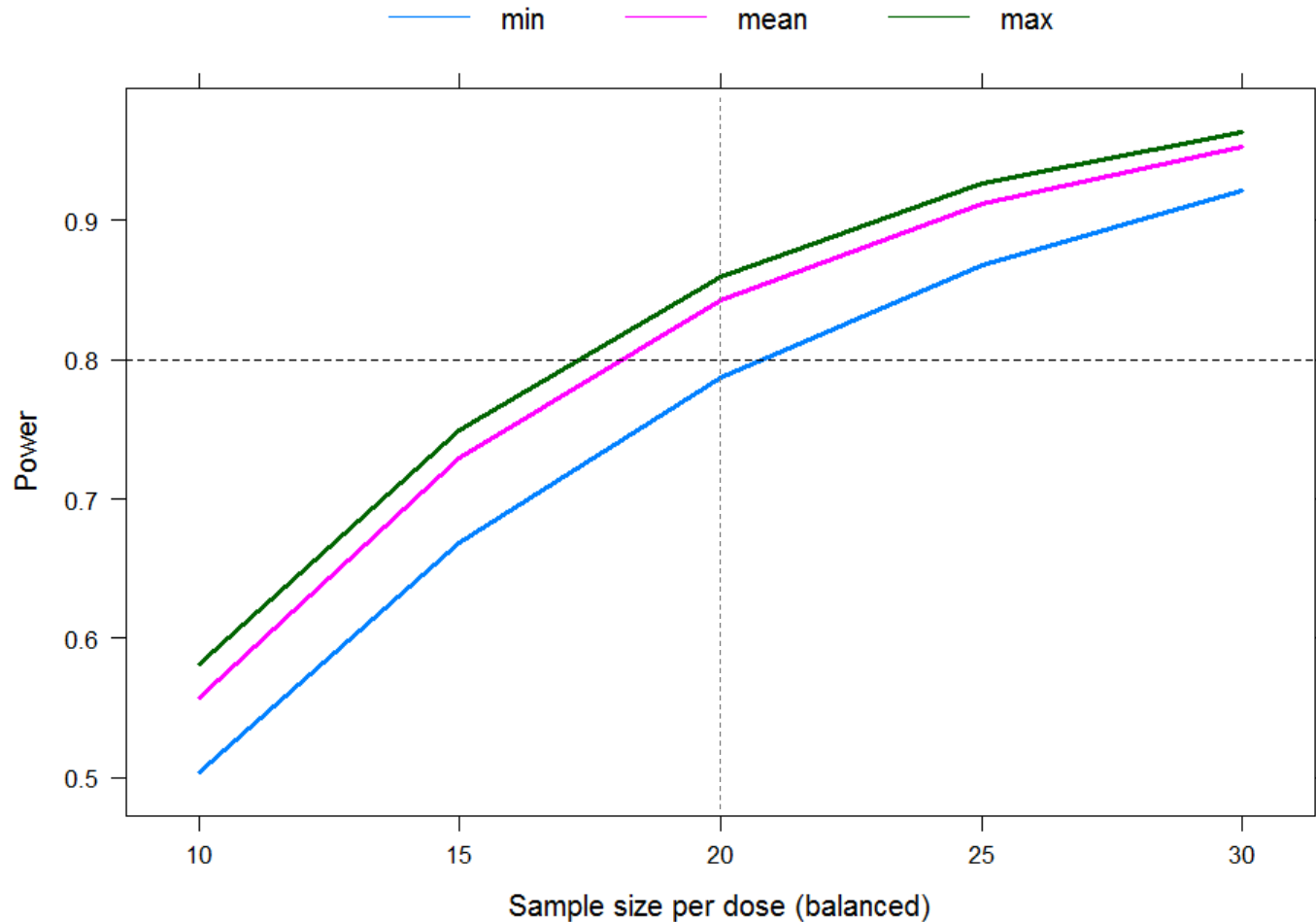
Dose determination and sample size calculation to achieve targeted performance characteristics

- Two different ways to calculate sample size
 - Estimation precision
 - Ensure the width of the confidence intervals for the quantities of interest (e.g., MED) are smaller than a pre-specified maximum value
 - Power analysis
 - Achieve a pre-specified power to detect a significant dose response signal
 - Considering the model uncertainty, one could
 - First, calculate the power for each of the candidate models
 - Then, aggregate the resulting values into a single **combined** measure of power, such as the minimum, mean, and maximum

MCP-Mod

biom example revisited: Sample size calculation

- Power to detect a significant dose response signal for $\sigma = 1$



MCP-Mod

Dose response signal testing


MCP step

- Assessment of dose-response signal using contrast tests

- If observed **maximum contrast test statistic**

$$\max_m T_m > q_{1-\alpha}$$

then we declare a significant dose response signal

- The critical value $q_{1-\alpha}$ is derived from the multivariate t distribution such that under the null hypothesis of no dose response

$$\Pr\left(\max_m T_m > q_{1-\alpha}\right) = \alpha$$

- All models with observed $T_m > q_{1-\alpha}$ are kept for possible use in dose response modelling

MCP-Mod

biom example revisited: Dose response signal testing

- The 5% one-sided critical value is $q_{0.95} = 2.15$

Model	Estimate	Standard error	T_m
E _{max}	0.55	0.159	3.46
Linear log-dose	0.49	0.159	3.11
Quadratic 1	0.49	0.159	3.10
Linear	0.47	0.159	2.97
Exponential 1	0.35	0.159	2.22
Exponential 2	0.30	0.159	1.90
Quadratic 2	0.29	0.159	1.85

- Conclusions:

- Since $\max_m T_m = 3.46 > 2.15 = q_{1-\alpha}$, we conclude that there is a significant dose response signal
- Models with $T_m > q_{0.95}$ are selected as significant models

MCP-Mod

Model selection

- Assessment of dose-response signal using contrast tests
- Model selection (or model averaging) out of the set of significant models

- **Either** select a single model from the significant models
 - Existing model selection criteria can be used, such as
 - Akaike information criterion (AIC)
 - Bayesian information criterion (BIC)
 - maximum contrast test statistics (not recommended)
- **Or** apply model averaging techniques
 - Weighted estimates across all the significant models are produced for the quantities of interest (Buckland et al., 1997)

MCP-Mod

Dose estimation and selection

MCP step

- Assessment of dose-response signal using contrast tests
- Model selection (or model averaging) out of the set of significant models

Mod step

Dose-response and target dose estimation based on selected model(s)

- Based on dose response modelling approaches, the selected model is used to fit the observed data and estimate a target dose (such as the MED or the ED_{90})

MCP-Mod

biom example revisited: Dose response and MED estimation

- Model selection, fitting and MED estimation via MCPMod function in DoseFinding R package

- Output (edited): `selected model (AIC): emax`

```
Estimated Dose Response Model:
```

```
emax model
```

```
  e0  eMax  ed50
```

```
0.322 0.746 0.142
```

```
Estimated MED, Delta=0.4
```

```
  emax
```

```
0.1642
```

- Emax model is selected from the candidate models and used for model parameter and MED estimation
 - Note that the Emax model above is the best fitting Emax model to the observed data and not the specific model shape included in the candidate set

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Generalized MCP-Mod

Notation

- Assume patient responses \mathbf{y} follow some distribution

$$\mathbf{y} \sim F(\mathbf{z}, \boldsymbol{\eta}, \mu(d)),$$

where

- $\mu(d)$ denotes the dose response information at dose d
 - $\boldsymbol{\eta}$ nuisance parameters
 - \mathbf{z} covariates
- Main idea
 - Extract dose response parameters $\mu(d_i)$ from this model and perform contrast test and dose response model fitting on these parameters
 - Concrete example to keep in mind
 - $\mu(d_i)$ coming from a normal model $N(\mu(d_i), \sigma^2)$

Generalized MCP-Mod

Applications

- Examples of application include
 - **Binary data**: $\mu(d)$ could be the probability or logit(probability)
 - **Negative binomial data**: $\mu(d)$ could be the log-mean of the distribution
 - **Weibull**: $\mu(d)$ could be the median of the survival distribution (using a re-parameterization of the Weibull model)
 - **Cox PH**: Requires working on control-adjusted data (not discussed here, but see Pinheiro et al. 2014)
 - Major restriction: $\mu(d)$ should be easily interpretable
 - need to formulate candidate models on this scale
- In each case: Fit an ANCOVA-type model (i.e. a model with dose as factor) and extract estimates $\hat{\mu}$ and corresponding estimated covariance matrix S
 - From there on, **all cases are treated the same way**

Generalized MCP-Mod

MCP step

■ At **design** stage

- Specify multiple candidate dose-response shapes μ_1, \dots, μ_M
- Derive optimal contrasts $\mathbf{c}_1^{opt}, \dots, \mathbf{c}_M^{opt}$ for these shapes

■ At **analysis** stage:

- Derive $\hat{\mu}$ and \mathbf{S} based on the observed data and the contrast test statistics

$$z_m = (\mathbf{c}_m^{opt})' \hat{\mu} / \sqrt{(\mathbf{c}_m^{opt})' \mathbf{S} (\mathbf{c}_m^{opt})}, \quad m = 1, \dots, M$$

- Calculation of p-values can be done via the joint distribution of z_1, \dots, z_M under the null hypothesis of no dose response

Generalized MCP-Mod

MCP step – derivation of optimal contrasts

- Assume a particular dose-response mean vector

$$\boldsymbol{\mu}_m = (\mu(d_1), \dots, \mu(d_k))$$

for k active doses d_1, \dots, d_k , including placebo

- Maximizing power of the single contrast test is the same as maximizing the non-centrality parameter $\mathbf{c}'\boldsymbol{\mu}_m/\sqrt{\mathbf{c}'\mathbf{S}\mathbf{c}}$
- **Optimization** leads to

$$\mathbf{c}_m^{opt} \propto \mathbf{S}^{-1} \left(\boldsymbol{\mu}_m - \frac{\boldsymbol{\mu}_m' \mathbf{S}^{-1} \mathbf{1}}{\mathbf{1}' \mathbf{S}^{-1} \mathbf{1}} \mathbf{1} \right)$$

Generalized MCP-Mod

MCP step

- If the asymptotic distribution of $\hat{\mu}$ is multivariate normal, then the distribution of the contrast statistics is also multivariate normal
 - In the case of normal data the exact distribution is multivariate t
- **Multiple models \Rightarrow multiple test problem**
 - Using $z_{max} = \max z_m$ with an appropriate critical value $q_{1-\alpha}$ ensures overall Type I error rate control at pre-specified level $\alpha \in (0,1)$

Generalized MCP-Mod

Mod step

- All models with significant contrast test statistic are fitted
- For normally distributed data, minimize least squares
- For generalized approach, assume $\hat{\boldsymbol{\mu}}$ is available that is multivariate normal distributed with covariance matrix \boldsymbol{S}
 - Use **generalized least squares**

$$(\hat{\boldsymbol{\mu}} - \boldsymbol{\mu}(d))' \boldsymbol{S}^{-1} (\hat{\boldsymbol{\mu}} - \boldsymbol{\mu}(d))$$

- Advantages
 - Applicable to non-normal and/or correlated data
 - Asymptotic approximations available (similar asymptotic distribution as MLE)
 - Often numerically similar to „traditional“ ML estimates
 - Only one software implementation needed for all parametric models with estimation methods leading to parameter estimates with asymptotic multivariate normal distribution

Generalized MCP-Mod

Mod step

- Model-based analysis
 - **Either** select one model (AIC, BIC, ...)
 - **Or** perform model averaging, e.g.
 - by using weights determined by AIC, BIC
 - i.e. using weights proportional to $\exp(-AIC_m/2)$ or $\exp(-BIC_m/2)$
 - or by bootstrapping the model selection itself and using bootstrap estimates

- Perform inference on quantities of interest using the selected dose response model(s)

Example

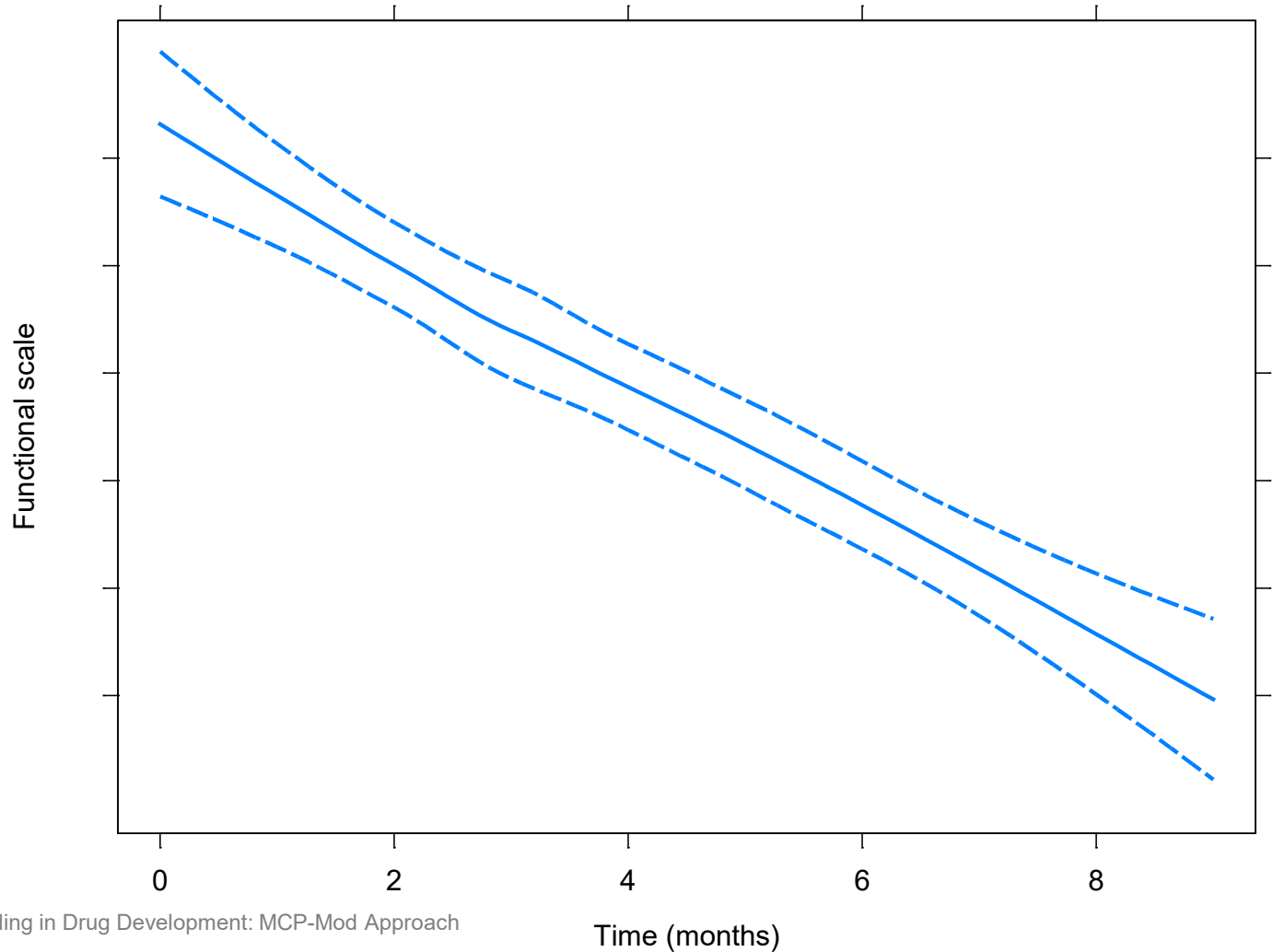
Background

- Disease progression measured by **functional scale** that decreases linearly with time
- Objective is to reduce, or stop, rate of worsening over time (i.e., **impact slope**)
- Trial design:
 - Placebo and 4 doses (1, 3, 10, 30 mg), balanced with 50 patients/arm
 - one year duration with measurements at baseline and every 3 months thereafter
- Study **objective**: test dose response signal, and estimate dose-time response

Example

Linearity of functional scale

- Loess smoother on historical placebo data



Example

Two-stage approach

- Initial dose-time response model with an ANOVA-type parameterization for the functional scale measurement y_{it} on patient i at time t ,

$$y_{it} = (\beta_0 + b_{0i}) + (\mu(d) + b_{1i})t + \varepsilon_{ij}$$

where

- $\mu(d)$ is the parameter of interest (linear slope of disease progression)
- b_{0i}, b_{1i} are patient specific random effects (intercept and slope)
- $(b_{0i}, b_{1i}) \sim N(\mathbf{0}, \mathbf{\Lambda})$ and $\varepsilon_{ij} \sim N(0, \sigma^2)$

Example

Two-stage approach

- The dose-response parameter $\mu(d)$ is expected time slope, which is expressed by a **second-level** model,
 - For example, for the Emax model

$$\mu(d) = E_0 + E_{max} \frac{d}{ED_{50} + d}$$

- Under ANOVA parameterization for $\mu(d)$, **LME** model is used to fit data; parametric models for $\mu(d)$ require **NLME** modeling

Example

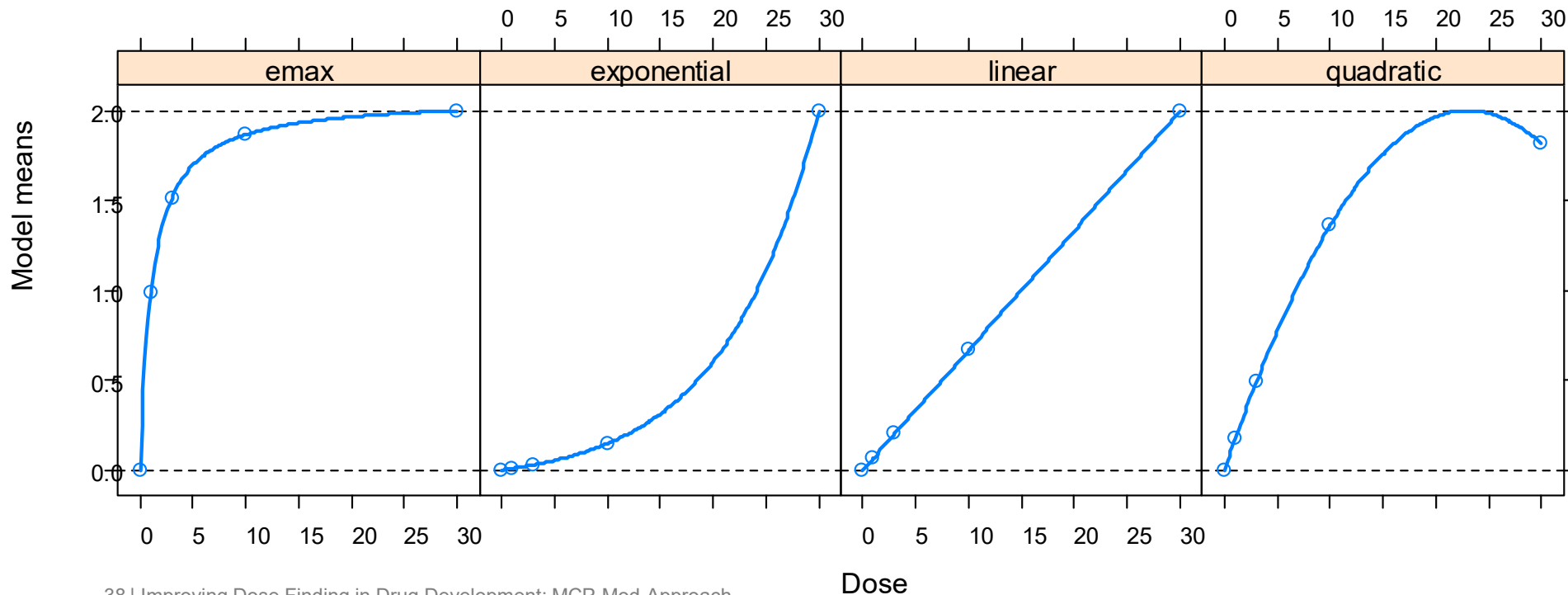
Assumptions

- Placebo effect: 0 change in slope (natural progression)
- Maximum improvement over placebo for dose range: 2
- Target effect: 1.4
- From historical data, estimates for variance-covariance parameters
 - $var(b_{0i}) \approx 64$; $var(b_{1i}) \approx 16$; $corr(b_{0i}, b_{1i}) \approx -0.2$; $var(\varepsilon_{ij}) = 4$
- Based on these and assumed design (sample size, visits, doses, etc.), can derive estimate for covariance matrix of ANOVA estimates
 - Compound symmetry with variance 0.1451 and covariance 0.0092

Example

Candidate models

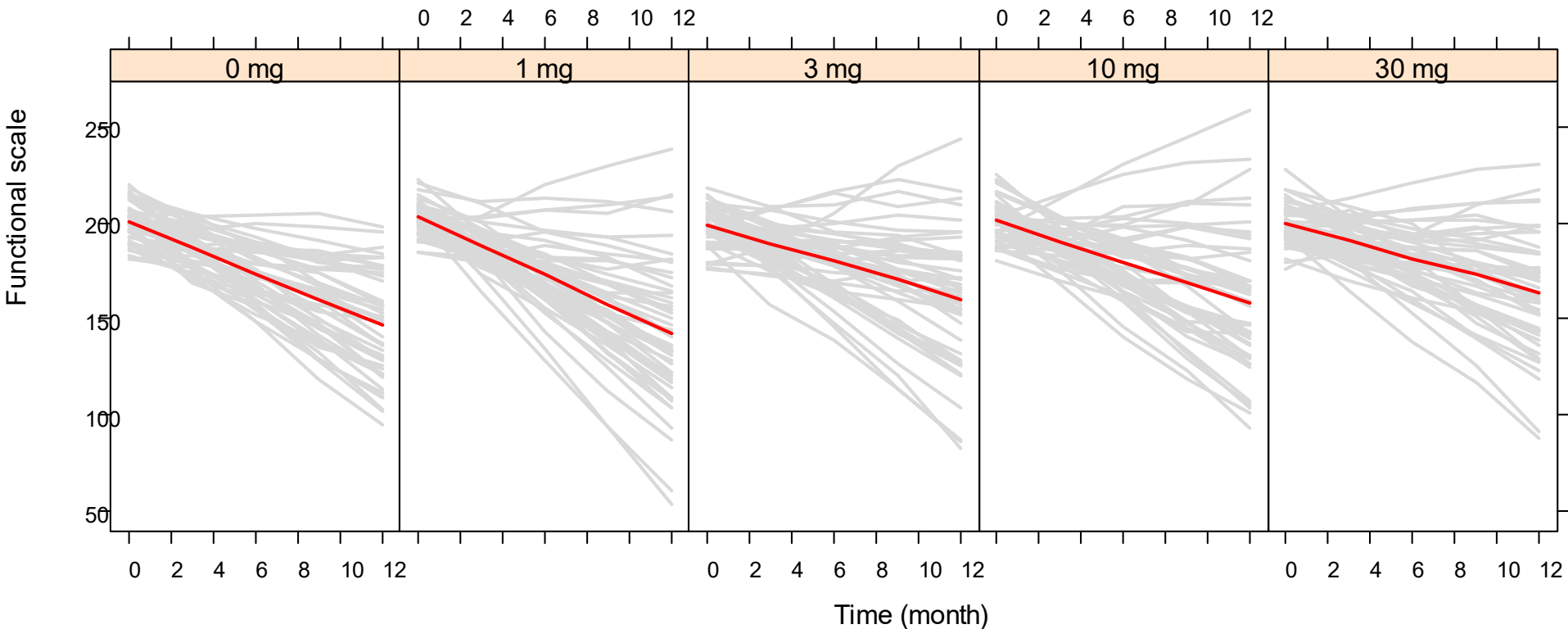
- Plausible dose response shapes for slope: linear, Emax, exponential, and quadratic
- Estimates of model parameters obtained from discussions with clinical team



Example

Simulated data for illustration

- Longitudinal data simulated according to Emax candidate model (and previous assumptions)



Example

DoseFinding package – LME fit with ANOVA parameterization

```
> library(nlme)
> fm <- lme(resp ~ dose:time, dat, ~time|id)
>
> muH <- fixef(fm)[-1] # extract d-r estimates to work with
> muH
  dose0:time dose1:time dose3:time dose10:time dose30:time
      -5.099      -4.581      -3.220      -2.879      -3.520
>
> covH <- vcov(fm)[-1,-1] # and their covariance matrix
> covH
      dose0:time dose1:time dose3:time dose10:time dose30:time
dose0:time  0.1490  0.0094  0.0094  0.0094  0.0094
dose1:time  0.0094  0.1490  0.0094  0.0094  0.0094
dose3:time  0.0094  0.0094  0.1490  0.0094  0.0094
dose10:time 0.0094  0.0094  0.0094  0.1490  0.0094
dose30:time 0.0094  0.0094  0.0094  0.0094  0.1490
```


Example

DoseFinding *package* – *Testing and modelling*

```
> MCTtest(doses, muH, S=covH, type = "general", critV = T, contMat=contMat)
```

```
. . .
```

```
Multiple Contrast Test:
```

	t-Stat	adj-p
emax	4.5606	< 1e-04
quadratic	3.6795	0.0002323
linear	2.2739	0.0252661
exponential	1.2767	0.1822576

```
Critical value: 2.2768 (alpha = 0.025, one-sided)
```

```
> fitMod(doses, muH, S=covH, model="emax", type = "general", bnds=c(0.1, 10))
```

```
Dose Response Model
```

```
Model: emax
```

```
Fit-type: general
```

```
Coefficients dose-response model
```

	e0	eMax	ed50
	-5.1808	2.1802	1.1873

Example

NLME model fit of dose time response model

```
## emax
> fmE <- nlme(resp ~ b0 + (e0 + eM * dose/(ed50 + dose))*time, dat,
             fixed = b0 + e0 + eM + ed50 ~ 1, random = b0 + e0 ~ 1 | id,
             start = c(200, -4.6, 1.6, 3.2))

## quadratic
> fmQ <- nlme(resp ~ b0+(e0 + e1 * dose + e2 * dose * dose)*time, dat,
             fixed = b0 + e0 + e1 + e2 ~ 1, random = b0 + e0 ~ 1 | id,
             start = c(200, -4.5, 0.144, -0.033))

> fmE
. . .
Log-likelihood: -4180.254
Fixed: b0 + e0 + eM + ed50 ~ 1
      b0          e0          eM          ed50
200.451303  -5.178739   2.181037   1.198791
```

- Parameter estimates from NLME fit are very close to the ones from second-level model fit

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MCP-Mod

In-scope: When to use MCP-Mod

- Drug development stage
 - Phase II dose finding studies to support dose selection for Phase III

- Response
 - Univariate (efficacy or safety) measurement (could be a binary, count, continuous or time-to-event endpoint). Observations typically cross-sectional (i.e. from a single time point)

- Dose
 - Or any other univariate, continuous, quantitative measurement

- Rules of thumb:
 - 4 – 7 active doses
 - > 10-fold dose-range, logarithmic dose-spacing
 - include placebo and/or active control

MCP-Mod

*Out-of-scope: When **not** to use MCP-Mod*

- Titration designs and dose escalation studies
- Vaccines and regimen finding for biologics where there is no steady state
- Exposure-response analyses or pharmacokinetic-pharmacodynamic (PK-PD) models
 - similar principles could/should be applied
 - MCP-Mod is focused on **dose response** modelling only
- Predictions from a surrogate / biomarker or short term readout to a clinical Phase III endpoint



EUROPEAN MEDICINES AGENCY
SCIENCE MEDICINES HEALTH

23 January 2014
EMA/CHMP/SAWP/757052/2013
Committee for Medicinal Products for Human Use (CHMP)

Qualification Opinion of MCP-Mod as an efficient statistical methodology for model-based design and analysis of Phase II dose finding studies under model uncertainty

Draft agreed by Scientific Advice Working Party	5 September 2013
Adopted by CHMP for release for consultation	19 September 2013 ¹
Start of public consultation	15 October 2013 ²
End of consultation (deadline for comments)	24 November 2013 ³
Adoption by CHMP	23 January 2014

FDA Fit-for-Purpose Determination of MCP-Mod



DEPARTMENT OF HEALTH & HUMAN SERVICES

Food and Drug Administration
Silver Spring, MD 20993

May 26, 2016

Janssen Research & Development, LLC
Attention: Purve Patel, RPh
Director, Global Regulatory Affairs
920 Highway 202, South
Raritan, NJ 088969

Dear Ms. Patel:

Please refer to the submission by Janssen Pharmaceuticals and Novartis Pharmaceuticals intended to support the use of MCP-Mod^{1,2} as an efficient statistical methodology for model-based design and analysis of Phase II dose finding studies under model uncertainty. We have completed our review of your submission and have determined it is fit-for-purpose in the context outlined in this letter.

MCP-Mod: CHMP (2014) Qualification Opinion and (2016) FDA Fit-for-Purpose Determination

- Both emphasize the importance of conducting proper dose-finding studies before going to Phase III
- MCP-Mod will encourage better study designs (with more dose levels and broader dose-range)
 - MCP-Mod is only one method among several others
- Acceptance of model-based techniques often subject to discussion
 - EMA/CHMP and FDA are positive on MCP-Mod
- Difference of MCP-Mod to other model-based approaches
 - Modelling activity is pre-specified at design stage (less „cherry-picking“)
 - Acknowledges model uncertainty

Dose Finding

Take home messages

- Precise estimation of dose response provides the strongest basis supporting dose selection for Phase III / submissions
- Traditional dose ranging designs do not provide explicit dose response characterization, and often lack precision to differentiate active doses
- Model-based dose response assessment requires careful consideration of trial design
 - Essential to ensure inclusion of sufficient doses to cover both the steep part of the curve and the plateau
- Dose response relationships exist for both efficacy and safety, and it is necessary to estimate the therapeutic window
- Adaptive designs, in which dose allocation changes based on observed responses, should routinely be considered

Questions?