

ε In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Overview

 'Classical' sample size estimation in BE Patient's & producer's risk Power in study planning Uncertainties Variability Test/Reference-ratio Sensitivity analysis Recent developments Review of guidelines





- All formal decisions are subjected to two types of error:
 - Error Type I (*a*-Error, Risk Type I)
 - Error Type II (β -Error, Risk Type II)
 - Example from the justice system:

Verdict	Defendant innocent	Defendant guilty
Presumption of innocence not accepted (guilty)	Error type I	Correct
Presumption of innocence accepted (not guilty)	Correct	Error type II





•Or in more statistical terms:

Decision	Null hypothesis true	Null hypothesis false
Null hypothesis rejected	Error type I	Correct (H _a)
Failed to reject null hypothesis	Correct (H ₀)	Error type II

In BE-testing the null hypothesis is bioinequivalence (μ₁ ≠ μ₂)!

Decision	Null hypothesis true	Null hypothesis false
Null hypothesis rejected	Patients' risk	Correct (BE)
Failed to reject null hypothesis	Correct (not BE)	Producer's risk

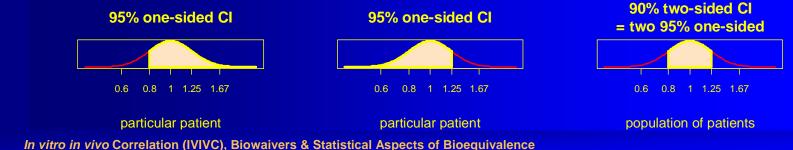
ε

χ ε





- α-Error: Patient's Risk to be treated with a bioinequivalent formulation (H₀ falsely rejected)
 - BA of the test compared to reference in a particular patient is risky <u>either</u> below 80% <u>or</u> above 125%.
 - If we keep the risk of particular patients at 0.05 (5%), the risk of the entire population of patients (<80% and >125%) is $2 \times \alpha$ (10%) – expressed as: 90% Cl = 1 – $2 \times \alpha$ = 0.90



T Pharma Edge in Drug Product Development | Mumbai, 27 January 2012





- β -Error: Producer's Risk to get no approval for a bioequivalent formulation (H_0 falsely not rejected)
 - Set in study planning to ≤ 0.2 , where power = $1 \beta = \geq 80\%$
 - If power is set to 80 %
 - One out of five studies will fail just by chance!

α 0.05	BE
not BE	β 0.20

A posteriori (post hoc) power does not make sense!
Either a study has demonstrated BE or not.

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012

8

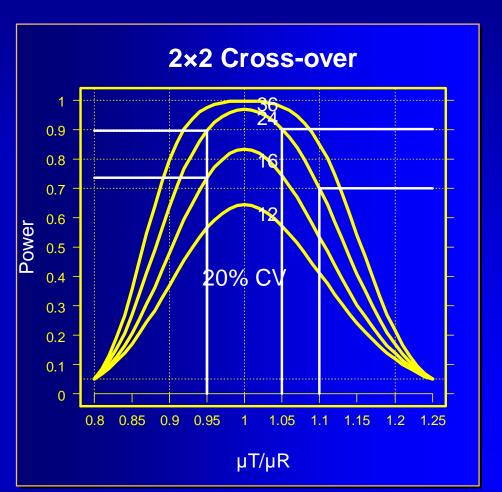


Power Curves

Power to show BE with 12 - 36subjects for CV_{intra} 20%

 $\begin{array}{ccc} n & 24 & \downarrow & 16: \\ power & 0.896 \rightarrow & 0.735 \end{array}$

 μ_T/μ_R 1.05 \downarrow 1.10: power 0.903 \rightarrow 0.700



In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Power vs. Sample Size

- It is not possible to calculate the required sample size *directly*.
- Power is calculated instead; the smallest sample size which fulfills the minimum target power is used.
 - Example: α 0.05, target power 80% (β 0.2), T/R 0.95, CV_{intra} 20% \rightarrow minimum sample size 19 (power 81%), rounded *up* to the next even number in a 2×2 study (power 83%).



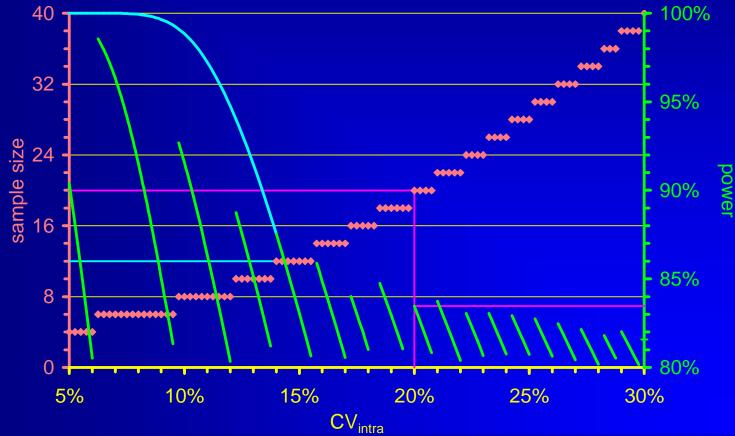
χ ε



Power vs. Sample Size

2x2 cross-over, T/R 0.95, AR 80-125%, target power 80%

sample size — power — power for n=12



In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Tools

- Sample Size Tables (Phillips, Diletti, Hauschke, Chow, Julious, …)
- Approximations (Diletti, Chow, Julious, ...)
- •General purpose (SAS, S+, R, StaTable, ...)
- Specialized Software (nQuery Advisor, PASS, FARTSSIE, StudySize, ...)
- Exact method (Owen implemented in *R*package *PowerTOST*)*

* Thanks to Detlew Labes!

ε χ ε

ε





 Reminder: Sample Size is not directly obtained; only power

- Solution given by DB Owen (1965) as a difference of two bivariate noncentral *t*-distributions
 - Definite integrals cannot be solved in closed form

'Exact' methods rely on numerical methods (currently the most advanced is AS 243 of RV Lenth; implemented in R, FARTSSIE, EFG). nQuery uses an earlier version (AS 184).



Background

Power calculations...

- 'Brute force' methods (also called 'resampling' or 'Monte Carlo') converge asymptotically to the true power; need a good random number generator (*e.g.*, Mersenne Twister) and may be time-consuming
- 'Asymptotic' methods use large sample approximations
- Approximations provide algorithms which should converge to the desired power based on the *t*-distribution

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Comparison														
			CV	%										
original values	Method	Algorithm	5	7.5	10	12	12.5	14	15	16	17.5	18	20	22
PowerTOST 0.9-2 (2011)	exact	Owen's Q	4	6	8	8	10	12	12	14	16	16	20	22
Patterson & Jones (2006)	noncentr. t	AS 243	4	5	7	8	9	11	12	13	15	16	19	22
Diletti <i>et al</i> . (1991)	noncentr. t	Owen's Q	4	5	7	NA	9	NA	12	NA	15	NA	19	NA
nQuery Advisor 7 (2007)	noncentr. t	AS 184	4	6	8	8	10	12	12	14	16	16	20	22
FARTSSIE 1.6 (2008)	noncentr. t	AS 243	4	5	7	8	9	11	12	13	15	16	19	22
	noncentr. t	AS 243	4	5	7	8	9	11	12	13	15	16	19	22
EFG 2.01 (2009)	brute force	ElMaestro	4	5	7	8	9	11	12	13	15	16	19	22
StudySize 2.0.1 (2006)	central t	?	NA	5	7	8	9	11	12	13	15	16	19	22
Hauschke et al. (1992)	approx. t		NA	NA	8	8	10	12	12	14	16	16	20	22
Chow & Wang (2001)	approx. t		NA	6	6	8	8	10	12	12	14	16	18	22
Kieser & Hauschke (1999) approx. t		2	NA	6	8	NA	10	12	14	NA	16	20	24
			CV%	<u></u>										,
original values	Method	Algorithm	22.5	2	4 2	5 26	6 27.5	28	30	32	34	36	38	40
PowerTOST 0.9-2 (2011)	exact	Owen's Q	24	2	6 28	3 30) 34	34	40	44	50	54	60	66
Patterson & Jones (2006)	noncentr. t	AS 243	23	2	6 28	3 30) 33	34	39	44	49	54	60	66
Diletti et al. (1991)	noncentr. t	Owen's Q	23	N/	A 2 8	B NA	33	NA	39	NA	NA	NA	NA	NA
nQuery Advisor 7 (2007)	noncentr. t	AS 184	24	2	6 28	8 30) 34	34	40	44	50	54	60	66
FARTSSIE 1.6 (2008)	noncentr. t	AS 243	23	2	6 28	8 30) 33	34	39	44	49	54	60	66
EEC 2.01 (2000)	noncentr. t	AS 243	23	2	6 28	3 30) 33	34	39	44	49	54	60	66
EFG 2.01 (2009)	brute force	ElMaestro	23	2	6 28	3 30) 33	34	39	44	49	54	60	66
StudySize 2.0.1 (2006)	central t	?	23	2	6 28	3 30) 33	34	39	44	49	54	60	66
Hauschke et al. (1992)	approx. t		24	2	6 28	3 30) 34	36	40	46	50	56	64	70
Chow & Wang (2001)	approx. t		24	2	6 28	3 30) 34	34	38	44	50	56	62	68
Kieser & Hauschke (1999)	approx. t		NA	2	8 30	0 32	2 NA	38	42	48	54	60	66	74

εIn vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalenceπ Pharma EdgeIn Drug Product Development | Mumbai, 27 January 2012



Sample Size (Limits)

Minimum

- 12: WHO, EU, CAN, NZ, AUS, AR, MZ, ASEAN States, RSA
- 12: USA 'A pilot study that documents BE can be appropriate, provided its design and execution are suitable and a sufficient number of subjects (*e.g.*, 12) have completed the study.'
- 20: RSA (MR formulations)
- 24: Brazil, Saudia Arabia (12 to 24 if statistically justifiable)
- Sufficient number: JPN

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Sample Size (Limits)

Maximum

- NZ: 'If the calculated number of subjects appears to be higher than is ethically justifiable, it may be necessary to accept a statistical power which is less than desirable. Normally it is not practical to use more than about 40 subjects in a bioavailability study.'
- All others: Not specified (judged by IEC/IRB or local Authorities).
 ICH E9, Section 3.5 applies: 'The number of subjects in a clinical trial should always be large enough to provide a reliable answer to the
- questions addressed.'



Power & Sample Size

Reminder

Generally power is set to at least 80% (β , error type II: producers's risk to get no approval for a bioequivalent formulation; power = $1 - \beta$).

1 out of 5 studies will fail just by chance!

- If you plan for power of less than 70%, problems with the ethics committee are likely (ICH E9).
- If you plan for power of more than 90% (especially with low variability drugs), problems with the regulator are possible ('forced bioequivalence').
- Add subjects ('alternates') according to the expected drop-out rate – especially for studies with more than two periods or multiple-dose studies.

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



US FDA, Canada TPD

- Statistical Approaches to Establishing Bioequivalence (2001)
 - Based on maximum difference of 5%.
 - Sample size based on 80% 90% power.
- •Draft GL (2010)
 - Consider potency differences.
 - Sample size based on 80% 90% power.
 - Do not interpolate linear between CVs (as stated in the GL)!

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012

ε





•EMEA NfG on BA/BE (2001)

 Detailed information (data sources, significance level, expected deviation, desired power).

•EMA GL on BE (2010)

- Batches must not differ more than 5%.
- The number of subjects to be included in the study should be based on an appropriate sample size calculation.



Information

ε



Hierarchy of Designs

•The more 'sophisticated' a design is, the more information can be extracted. Hierarchy of designs: Full replicate (TRTR | RTRT) → Partial replicate (TRR | RTR | RRT) → Standard 2×2 cross-over (RT | RT) ₹ Parallel (R | T) Variances which can be estimated: Parallel: total variance (between + within) 2x2 Xover: + between, within subjects $\cancel{2}$ Partial replicate: + within subjects (reference) \Rightarrow Full replicate: + within subjects (reference, test) 🕩

ε



Coefficient(s) of Variation

 From any design one gets variances of lower design levels also.

Total CV% from a 2x2 cross-over used in planning a parallel design study:

Intra-subject CV% (within) $\longrightarrow CV_{intra} \% = 100 \cdot \sqrt{e^{MSE_W}} - 1$

- Inter-subject CV% (between)
- Total CV% (pooled)

$$CV_{\text{inter}} \% = 100 \cdot \sqrt{e^{\frac{MSE_B - MSE_W}{2}} - 1}$$

$$CV_{\text{total}} \% = 100 \cdot \sqrt{e^{\frac{MSE_B + MSE_W}{2}}} - 100$$

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Coefficient(s) of Variation

•CVs of higher design levels not available.

- If only mean ± SD of reference is available...
 - Avoid 'rule of thumb' CV_{intra}=60% of CV_{total}
 - Don't plan a cross-over based on CV_{total}
 - Examples (cross-over studies)

drug, formulation	design	n	metric	CV _{intra}	CV _{inter}	CV _{total}
methylphenidate MR	SD	12	AUCt	7.00	19.1	20.4
paroxetine MR	MD	32	AUC _τ	25.2	55.1	62.1
lansoprazole DR	SD	47	C _{max}	47.0	25.1	54.6

- Pilot study unavoidable, unless
- Two-stage sequential design is used

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012

χ ε



Hints

Literature search for CV%

- Preferably other BE studies (the bigger, the better!)
- PK interaction studies (Cave: Mainly in steady state! Generally lower CV than after SD).
- Food studies (CV higher/lower than fasted!)
- If CV_{intra} not given (quite often), a little algebra helps. All you need is the 90% geometric confidence interval and the sample size.





Calculation of CV_{intra} from CI

Point estimate (PE) from the Confidence Limits

 $PE = \sqrt{CL_{lo} \cdot CL_{hi}}$

Estimate the number of subjects / sequence (example 2x2 cross-over)

If total sample size (N) is an even number, assume (!)

 $n_1 = n_2 = \frac{1}{2}N$

If N is an odd number, assume (!)

 $n_1 = \frac{1}{2}N + \frac{1}{2}, n_2 = \frac{1}{2}N - \frac{1}{2} (not n_1 = n_2 = \frac{1}{2}N!)$

Difference between one CL and the PE in log-scale; use the CL which is given with more significant digits

 $\Delta_{CL} = \ln PE - \ln CL_{lo} \quad or \quad \Delta_{CL} = \ln CL_{hi} - \ln PE$

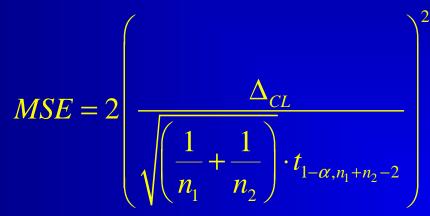
π Pharma Edge In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence in Drug Product Development | Mumbai, 27 January 2012





Calculation of CV_{intra} from CI (cont'd)

Calculate the Mean Square Error (MSE)



CV_{intra} from MSE as usual $CV_{intra} \% = 100 \cdot \sqrt{e^{MSE} - 1}$

π ε χ ε

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence T Pharma Edge in Drug Product Development | Mumbai, 27 January 2012





 Calculation of CV_{intra} from CI (cont'd) Example: 90% CI [0.91 – 1.15], N 21 (n₁ = 11, n₂ = 10) $PE = \sqrt{0.91 \cdot 1.15} = 1.023$ $\Delta_{CI} = \ln 1.15 - \ln 1.023 = 0.11702$ $MSE = 2 \left(\frac{0.11702}{\sqrt{\left(\frac{1}{11} + \frac{1}{10}\right)} \times 1.729}} \right)^{2} = 0.04798$ $CV_{intra} \% = 100 \times \sqrt{e^{0.04798} - 1} = 22.2\%$

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012

πεχε



Algebra...

• Proof: CI from calculated values • Example: 90% CI [0.91 – 1.15], N 21 ($n_1 = 11, n_2 = 10$) $\ln PE = \ln \sqrt{CL_{lo} \cdot CL_{hi}} = \ln \sqrt{0.91 \times 1.15} = 0.02274$

$$SE_{\Delta} = \sqrt{\frac{2 \cdot MSE}{N}} = \sqrt{\frac{2 \times 0.04798}{21}} = 0.067598$$
$$CI = e^{\ln PE \pm t \cdot SE_{\Delta}} = e^{0.02274 \pm 1.729 \times 0.067598}$$
$$CI_{lo} = e^{0.02274 - 1.729 \times 0.067598} = 0.91$$
$$CI_{hi} = e^{0.02274 + 1.729 \times 0.067598} = 1.15$$

ε In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Sensitivity to Imbalance

 If the study was more imbalanced than assumed, the estimated CV is conservative

Example: 90% CI [0.89 – 1.15], N 24 (n₁ = 16, n₂ = 8, but not reported as such); CV 24.74% in the study

Balanced Sequences	n ₁	n ₂	CV%	
assumed	12	12	26.29	
	13	11	26.20	
	14	10	25.91	
	15	9	25.43	
Sequences in study	16	8	24.74	

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012





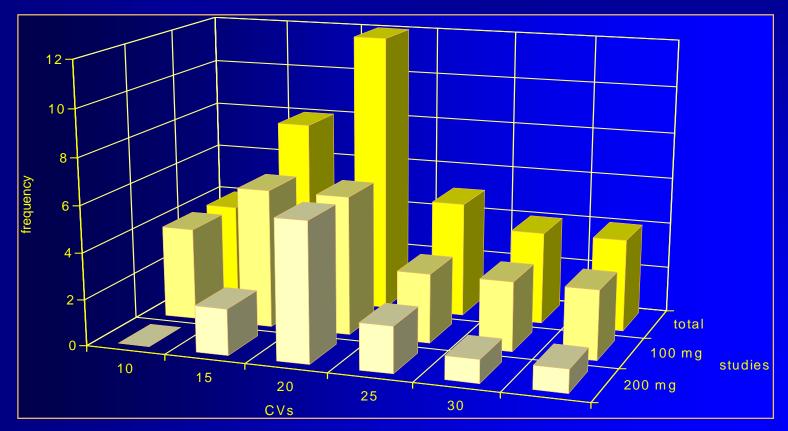
 Implemented in *R*-package *PowerTOST*, function *CVfromCI* (not only 2×2 cross-over, but also parallel groups, higher order crossovers, replicate designs). Previous example:

require(PowerTOST)
CVfromCI(lower=0.91, upper=1.15, n=21, design="2x2", alpha=0.05)
[1] 0.2219886

χ ε



Literature data



Doxicycline (37 studies from Blume/Mutschler, *Bioäquivalenz: Qualitätsbewertung wirkstoffgleicher Fertigarzneimittel*, GOVI-Verlag, Frankfurt am Main/Eschborn, 1989-1996)

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge
 in Drug Product Development | Mumbai, 27 January 2012



Pooling of CV%

- Intra-subject CV from different studies can be pooled (LA Gould 1995, Patterson and Jones 2006)
 - In the parametric model of log-transformed data, additivity of variances (not of CVs!) apply.
 - Do not use the arithmetic mean (or the geometric mean either) of CVs.
 - Before pooling variances must be weighted acccording to the studies' sample size and sequences
 - Larger studies are more influentual than smaller ones.
 - More sequences (with the same n) give higher CV.

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Pooling of CV%

• Intra-subject CV from different Xover studies • Calculate the variance from CV $\sigma_W^2 = \ln(CV_{intra}^2 + 1)$ • Calculate the total variance weighted by df $\sum \sigma_W^2 df$ • Calculate the pooled CV from total variance $CV = \sqrt{e^{\sum \sigma_W^2 df} - 1}$

• Optionally calculate an upper $(1-\alpha)$ % confidence limit on the pooled CV (recommended $\alpha = 0.25$)

$$CL_{CV} = \sqrt{e^{\sum \sigma_W^2 df / \chi^2_{\alpha, \sum df}} - 1}$$



Pooling of CV%

Degrees of freedom of various Xover designs

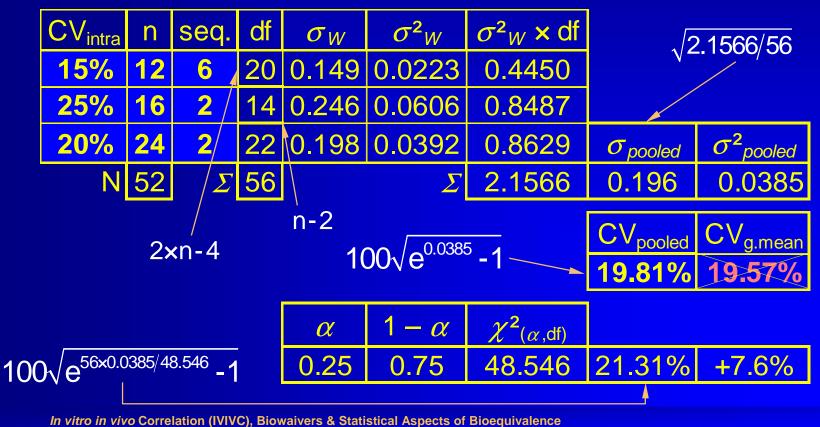
Name	df	Name in PowerTOST
2×2×2 cross over	n – 2	2x2
3×3 Latin Squares	2n – 4	3x3
6 sequence Williams' design	2n – 4	3x6x3
4×4 Latin Squares, Williams'	3n – 6	4x4
2x2x3 replicate design	2n – 3	2x2x3
2x2x4 replicate design	3n – 4	2x2x4
2×4×4 replicate design	3n – 4	2x4x4
2×3×3 partial replicate	3n – 4	2x3x2

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence in Drug Product Development | Mumbai, 27 January 2012



Pooling of CV%

Example: 3 studies, different Xover designs



T Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Pooling of CV%

R package *PowerTost* function *CVpooled*, example's data.

```
require(PowerTOST)
CVs <- ("
  PKmetric | CV | n | design |
                                     source
     AUC | 0.15 | 12 | 3x6x3 |
                                     study 1
     AUC | 0.25 | 16 | 2x2 |
                                     study 2
     AUC | 0.20 | 24 |
                           2x2
                                     study 3
")
txtcon <- textConnection(CVs)</pre>
CVdata <- read.table(txtcon, header=TRUE, sep="|",</pre>
             strip.white=TRUE. as.is=TRUE)
close(txtcon)
CVsAUC <- subset(CVdata,PKmetric=="AUC")</pre>
print(CVpooled(CVsAUC, alpha=0.25), digits=4, verbose=TRUE)
Pooled CV = 0.1981 with 56 degrees of freedom
Upper 75% confidence limit of CV = 0.2131
 In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
```



Pooling of CV%

Or you may combine pooling with an estimated sample size based on uncertain CVs (we will see later what that means). *R* package *PowerTost* function *expsampleN.TOST*, data of last example.
CVs and degrees of freedom must be given as vectors:
CV = c(0.15, 0.25, 0.2), dfcv = c(20, 14, 22)



Pooling of CV%

```
require(PowerTOST)
expsampleN.TOST(alpha=0.05,
   targetpower=0.8, theta0=0.95,
   CV=c(0.15,0.25,0.2),
   dfCV=c(20,14,22),
   alpha2=0.25, design="2x2",
   print=TRUE, details=TRUE)
```

++++++ Equivalence test - TOST +++++++ Sample size est. with uncertain CV

```
Study design: 2x2 crossover
Design characteristics:
df = n-2, design const. = 2, step = 2
log-transformed data (multiplicative model)
alpha = 0.05, target power = 0.8
BE margins = 0.8 \dots 1.25
Null (true) ratio = 0.95
Variability data
  CV df
0.15 20
0.25 14
0.20 22
CV(pooled)
             = 0.1981467 with 56 df
one-sided upper CL = 0.2131329 (level = 75%)
Sample size search
     exp. power
n
16
   0.733033
18
  0.788859
20
   0.832028
```

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Pooling of CV%

- 'Doing the maths' is just part of the job!
 - Does it make sense to pool studies of different 'quality'?
 - The reference product may have been subjected to many (minor only?) changes from the formulation used in early publications.
 - Different bioanalytical methods are applied. Newer (*e.g.* LC/MS-MS) methods are not necessarily better in terms of CV (matrix effects!).
 - Generally we have insufficient information about the clinical setup (*e.g.* posture control).
 - Review studies critically; don't try to mix oil with water.

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Sample size tables

Diletti E, Hauschke D and VW Steinijans

Sample size determination for bioequivalence assessment by means of confidence intervals Int J Clin Pharmacol Ther Toxicol 29/1, 1–8 (1991)

<i>α</i> 0.05, <i>Δ</i> 0.2 [0.80 – 1.25], Power 80%							α 0.05, \varDelta 0.2 [0.80 – 1.25], Power 90%											
CV% PE (GMR, T/R)									CV%	PE (GMR, T/R)								
	0.85	0.90	0.95	1.00	1.05	1.10	1.15	1.20		C v 70	0.85	0.90	0.95	1.00	1.05	1.10	1.15	1.20
5.0	11	5	4	4	4	5	7	22		5.0	14	6	4	4	4	5	8	28
7.5	21	7	5	5	5	7	12	44		7.5	28	9	6	5	6	8	16	60
10.0	35	11	7	6	7	10	20	75		10.0	48	14	8	7	8	13	26	104
12.5	54	16	9	8	9	14	30	117		12.5	74	21	11	9	11	18	40	161
15.0	77	22	12	10	12	19	41	167		15.0	106	29	15	12	15	25	57	231
17.5	103	29	15	13	15	25	56	226		17.5	142	39	20	15	19	34	75	312
20.0	134	37	19	16	18	32	72	293		20.0	185	50	26	19	24	43	99	405
22.5	168	46	23	19	23	39	90	368		22.5	232	63	31	23	30	54	124	509
25.0	206	56	28	23	27	48	110	452		25.0	284	77	37	28	36	65	151	625
27.5	247	67	33	27	33	57	132	543		27.5	342	92	44	34	43	78	181	751
30.0	292	79	39	32	38	67	155	641		30.0	403	108	52	39	51	92	214	888

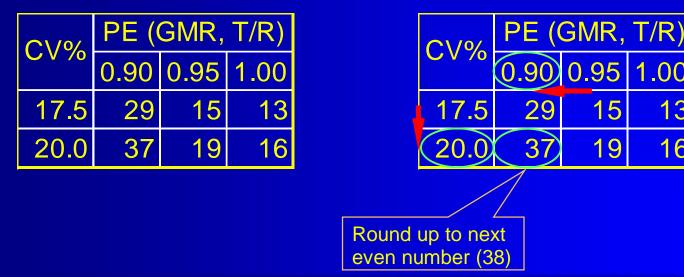
ε

χ ε



Sample size tables

- •Never interpolate!
- •Use the most conservative cell entry (higher CV, PE away from 1)
 - Example: Sample size for CV 18%, PE 0.92, 80% power?



In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence T Pharma Edge in Drug Product Development | Mumbai, 27 January 2012

1.00

13

16



Approximations

Hauschke et al. (1992)

ε χ

Patient's risk α 0.05, Power 80% (Producer's risk β 0.2), AR [0.80 - 1.25], CV 0.2 (20%), T/R 0.95 1. $\Delta = \ln(0.8) - \ln(T/R) = -0.1719$ 2. Start with e.g. n=8/sequence 1. df = $n \cdot 2 - 1 = 8 \times 2 - 1 = 14$ 2. $t_{\alpha,df} = 1.7613$ 3. $t_{\beta,df} = 0.8681$ 4. new n = $[(t_{\alpha,df} + t_{\beta,df})^2 \cdot (CV/\Delta)]^2$ = $(1.7613+0.8681)^2 \times (-0.2/0.1719)^2 = 9.3580$ 3. Continue with n=9.3580/sequence (N=18.716 \rightarrow 19) 1. df = 16.716; roundup to the next integer 172. $t_{\alpha,df} = 1.7396$ 3. $t_{\beta,df} = 0.8633$ 4. new n = $[(t_{\alpha,df} + t_{\beta,df})^2 \cdot (CV/\Delta)]^2$ = $(1.7396+0.8633)^2 \times (-0.2/0.1719)^2 = 9.1711$ 4. Continue with n=9.1711/sequence (N=18.3422 \rightarrow 19) 1. df = 17.342; roundup to the next integer 18 2. $t_{\alpha,df} = 1.7341$ 3. $t_{\beta,df} = 0.8620$ 4. new n = $[(t_{\alpha,df} + t_{\beta,df})^2 \cdot (CV/\Delta)]^2 =$ $(1.7341+0.8620)^2 \times (-0.2/0.1719)^2 = 9.1233$ 5. Convergence reached (N=18.2466 \rightarrow 19): Use 10 subjects/sequence (20 total)

S-C Chow and H Wang (2001)

Patient's risk α 0.05, Power 80% (Producer's risk β 0.2), AR [0.80 - 1.25], CV 0.2 (20%), T/R 0.95 1. $\Delta = \ln(T/R) - \ln(1.25) = 0.1719$ 2. Start with e.g. n=8/sequence 1. df_{α} = roundup(2 · n-2) · 2-2 = (2×8-2)×2-2 = 26 2. $df_{B} = roundup(4 \cdot n - 2) = 4 \times 8 - 2 = 30$ 3. $t_{\alpha,df} = 1.7056$ 4. $t_{\beta/2,df} = 0.8538$ 5. new n = $\beta^2 \cdot [(t_{\alpha,df} + t_{\beta/2,df})^2/\Delta^2] =$ $0.2^2 \times (1.7056 + 0.8538)^2 / 0.1719^2 = 8.8723$ 3. Continue with n=8.8723/sequence (N=17.7446 \rightarrow 18) 1. $df_{\alpha} = roundup(2 \cdot n - 2) \cdot 2 - 2 = (2 \times 8.8723 - 2) \times 2 - 2 = 30$ 2. $df_{\beta} = roundup(4 \cdot n - 2) = 4 \times 8.8723 - 2 = 34$ 3. $t_{\alpha,df} = 1.6973$ 4. $t_{B/2.df} = 0.8523$ 5. new n = $\beta^2 \cdot [(t_{\alpha,df} + t_{\beta/2,df})^2/\Delta^2] =$ $0.2^2 \times (1.6973 + 0.8538)^2 / 0.1719^2 = 8.8045$ 4. Convergence reached (N=17.6090 \rightarrow 18): Use 9 subjects/sequence (18 total)

sample size	18	19	20		
power %	79.124	81.428	83.468		

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Approximations obsolete

Exact sample size tables still useful in checking the plausibility of software's results

 Approximations based on noncentral t (FARTSSIE17)

```
Free Analysis Research Tool Version 1.6
```

http://individual.utoronto.ca/ddubins/FARTSSIE17.xls

or \bigcirc / S+ \rightarrow

8

χ ε

Exact method (Owen) in *R*-package *PowerTOST*

http://cran.r-project.org/web/packages/PowerTOST/

require(PowerTOST)
 sampleN.TOST(alpha=0.05,
 targetpower=0.8,
 theta0=0.92, CV=0.18,
 design="2x2", method="exact")

```
alpha
        <- 0.05
                     # alpha
        < - 0.18
                     # intra-subject CV
CV
theta1 <- 0.80
                     # lower acceptance limit
theta2 <- 1/theta1 # upper acceptance limit
                     # expected ratio T/R
        <- 0.92
ratio
PwrNeed <- 0.80
                     # minimum power
Limit
        <- 1000
                     # Upper Limit for Search
                     # start value of sample size search
        <- 4
n
        <- sqrt(2)*sqrt(log(CV^2+1))
S
repeat{
        <- qt(1-alpha,n-2)
  t
        <- sqrt(n)*(log(ratio)-log(theta1))/s
  nc1
        <- sqrt(n)*(log(ratio)-log(theta2))/s
  nc2
  prob1 <- pt(+t,n-2,nc1); prob2 <- pt(-t,n-2,nc2)</pre>
  power <- prob2-prob1</pre>
                     # increment sample size
        <- n+2
  n
  if(power >= PwrNeed | (n-2) >= Limit) break }
Total
       <- n-2
if(Total == Limit){
  cat("Search stopped at Limit", Limit,
        obtained Power", power*100, "%\n")
  } else
  cat("Sample Size",Total,"(Power",power*100,"%)\n")
```



Tables vs. calculations

- The penalty to be paid using tables might be high – especially if uprounding has to be applied.
 - Sample sizes of the example: CV 18%, PE 0.92, 80% power
 - •Table: n = 38
 - Approximations
 - Hauschke *et al.* 1992: n = 24
 - Chow and Wang 2001: n = 22
 - FARTSSIE.xls: n = 22

ε χ ε

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Tables vs. calculations

- If we planned the study in 38 subjects (tables) instead of the required 22 (exact) we gain a lot of power, but how much?
 - •n = 22: power 80.55%
 - •n = 38: power 95.56%
- It's not only a good idea to 'play around' with assumptions, but also good statistical practice.

ε



Sensitivity Analysis

•ICH E9 (1998)

Section 3.5 Sample Size, paragraph 3

- The method by which the sample size is calculated should be given in the protocol [...]. The basis of these estimates should also be given.
- It is important to investigate the sensitivity of the sample size estimate to a variety of deviations from these assumptions and this may be facilitated by providing a range of sample sizes appropriate for a reasonable range of deviations from assumptions.
- In confirmatory trials, assumptions should normally be based on published data or on the results of earlier trials.

20% n=26



Sensitivity Analysis

Example

nQuery Advisor: $\sigma_w = \sqrt{\ln(CV_{intra}^2 + 1)}; \sqrt{\ln(0.2^2 + 1)} = 0.198042$

🖹 😂 🖬 🚳 🔞 🔥 🖺 🛍 🗮 🔳 🔺 🔽 🔳 St 🗠								
-tests (TOST) of equivalence in ratio of mear	ns for crosso	ver design (na	atural log scale)					
	90% power	25% CV	4 drop outs	25% CV + d.o.	PE 90%	worst case		
Test significance levels, α (one-sided)	0.050	0.050	0.050	0.050	0.050	0.050		
Lower equivalence limit for μ_T / μ_S , Δ_L	0.800	0.800	0.800	0.800	0.800	0.800		
Upper equivalence limit for μ_T / μ_S,Δ_U	1.250	1.250	1.250	1.250	1.250	1.250		
Expected ratio, μ_T / μ_S	0.950	0.950	0.950	0.950	0.900	0.900		
Crossover ANOVA, sqrt(MSE) (In scale)	0.198042	0.246221	0.198042	0.246221	0.198042	0.246221		
SD differences, σ_d (In scale)	0.280074	0.348209	0.280074	0.348209	0.280074	0.348209		
Power (%)	90.00	77.60	86.88	69.53	66.94	45.09		
n per sequence group	13	13	11	11	13	11		
	0% CV, 4 c ower 90% -	· · · · ·		V, 4 drop outs 90% → 70%	powe	CV, PE 90 er 90% → 6		

μ vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Sensitivity Analysis

•Example

PowerTOST, function *sampleN.TOST*

+++++++++ Equivalence test - TOST +++++++++ Sample size estimation

```
Study design: 2x2 crossover
log-transformed data (multiplicative model)
alpha = 0.05, target power = 0.9
BE margins = 0.8 ... 1.25
Null (true) ratio = 0.95, CV = 0.2
Sample size
n power
26 0.917633
```

π ε χ ε

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Sensitivity Analysis

•To calculate Power for a given sample size, use function *power*.*TOST*

```
require(PowerTost)
power.TOST(alpha=0.05, theta0=0.95, CV=0.25, n=26, design="2x2")
[1] 0.7760553
```

```
power.TOST(alpha=0.05, theta0=0.95, CV=0.20, n=22, design="2x2")
[1] 0.8688866
```

```
power.TOST(alpha=0.05, theta0=0.95, CV=0.25, n=22, design="2x2")
[1] 0.6953401
```

```
power.TOST(alpha=0.05, theta0=0.90, CV=0.20, n=26, design="2x2")
[1] 0.6694514
```

```
power.TOST(alpha=0.05, theta0=0.90, CV=0.25, n=22, design="2x2")
[1] 0.4509864
```

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



Sensitivity Analysis

Must be done *before* the study (a priori)
The Myth of retrospective (a posteriori) Power...

- High values do not further support the claim of already demonstrated bioequivalence.
- Low values do not invalidate a bioequivalent formulation.
- Further reader:

RV Lenth (2000) JM Hoenig and DM Heisey (2001) P Bacchetti (2010)

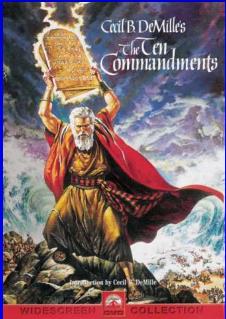
E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence T Pharma Edge in Drug Product Development | Mumbai, 27 January 2012

ε



Data from Pilot Studies

- Estimated CVs have a high degree of uncertainty (in the pivotal study it is more likely that you will be able to reproduce the PE, than the CV)
 - The smaller the size of the pilot, the more uncertain the outcome.
 - The more formulations you have tested, lesser degrees of freedom will result in worse estimates.
 - Remember: CV is an estimate not carved in stone!



In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence *T*^{Pharma Edge} in Drug Product Development | Mumbai, 27 January 2012



Pilot Studies: Sample Size

Small pilot studies (sample size <12)

- Are useful in checking the sampling schedule and
- the appropriateness of the analytical method, but
 are not suitable for the purpose of sample size planning!
- Sample sizes (T/R 0.95, power ≥80%) based on a n=10 pilot study

require(PowerTOST)
expsampleN.TOST(alpha=0.05,
 targetpower=0.80, theta1=0.80,
 theta2=1.25, theta0=0.95, CV=0.40,
 dfCV=24-2, alpha2=0.05, design="2x2")

CV%		CV	ratio			
C V 70	fixed	uncertain	uncert./fixed			
20	20	24	1.200			
25	28	36	1.286			
30	40	52	1.300			
35	52	68	1.308			
40	66	86	1.303			

If pilot n=24:

n=72, ratio 1.091

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge
 in Drug Product Development | Mumbai, 27 January 2012



Pilot Studies: Sample Size

- Moderate sized pilot studies (sample size ~12–24) lead to more consistent results (both CV and PE).
 - If you stated a procedure in your protocol, even BE may be claimed in the pilot study, and no further study will be necessary (US-FDA).
 - If you have some previous hints of high intrasubject variability (>30%), a pilot study size of at least 24 subjects is reasonable.
 - A Sequential Design may also avoid an unnecessarily large pivotal study.



Pilot Studies: Sample Size

- Do not use the pilot study's CV, but calculate an upper confidence interval!
 - Gould (1995) recommends a 75% CI (*i.e.*, a producer's risk of 25%).
 - Apply Bayesian Methods (Julious and Owen 2006, Julious 2010) implemented in *R's PowerTOST/expsampleN.TOST*.
 - Unless you are under time pressure, a Two-Stage Sequential Design will help in dealing with the uncertain estimate from the pilot study.

3

χ ε



Thank You! Sample Size Calculations Open Questions?

(More details and references in the handouts)



Helmut Schütz BEBAC

Consultancy Services for Bioequivalence and Bioavailability Studies 1070 Vienna, Austria <u>helmut.schuetz@bebac.at</u>

E In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



To bear in Remembrance...

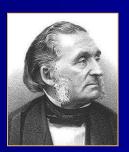
Power. That which statisticians are always calculating but never have.

Power: That which is wielded by the priesthood of clinical trials, the statisticians, and a stick which they use to beta their colleagues.



Power Calculation – A guess masquerading as mathematics.

Stephen Senn



You should treat as many patients as possible with the new drugs while they still have the power to heal. *Armand Trousseau*

π ε

χ ε



The Myth of Power

There is simple intuition behind results like these: If my car made it to the top of the hill, then it is powerful enough to climb that hill; if it didn't, then it obviously isn't powerful enough. Retrospective power is an obvious answer to a rather uninteresting question. A more meaningful question is to ask whether the car is powerful enough to climb a particular hill never climbed before; or whether a different car can climb that new hill. Such questions are prospective, not retrospective.

The fact that retrospective power adds no new information is harmless in its own right. However, in typical practice, it is used



to exaggerate the validity of a significant result ("not only is it significant, but the test is really powerful!"), or to make excuses for a nonsignificant one ("well, P is .38, but that's only because the test isn't very powerful"). The latter case is like blaming the messenger.

RV Lenth

Two Sample-Size Practices that I don't recommend <u>http://www.math.uiowa.edu/~rlenth/Power/2badHabits.pdf</u>

In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



References

•Collection of links to global documents http://bebac.at/Guidelines.htm

- -ICH
 - E9: Statistical Principles for Clinical Trials (1998)

•EMA-CPMP/CHMP/EWP

- Points to Consider on Multiplicity Issues in Clinical Trials (2002)
- BA/BE for HVDs/HVDPs: Concept Paper (2006) <u>http://bebac.at/downloads/14723106en.pdf</u>
- Questions & Answers on the BA and BE Guideline (2006) <u>http://bebac.at/downloads/4032606en.pdf</u>
- Draft Guideline on the Investigation of BE (2008)
- Guideline on the Investigation of BE (2010)
- Questions & Answers: Positions on specific questions addressed to the EWP therapeutic subgroup on Pharmacokinetics (2011)

•US-FDA

ε

χ ε

- Center for Drug Evaluation and Research (CDER)
 - Statistical Approaches Establishing Bioequivalence (2001)
 - Bioequivalence Recommendations for Specific Products (2007)

- Midha KK, Ormsby ED, Hubbard JW, McKay G, Hawes EM, Gavalas L, and IJ McGilveray Logarithmic Transformation in Bioequivalence: Application with Two Formulations of Perphenazine J Pharm Sci 82/2, 138–44 (1993)
- Hauschke D, Steinijans VW, and E Diletti Presentation of the intrasubject coefficient of variation for sample size planning in bioequivalence studies Int J Clin Pharmacol Ther 32/7, 376–8 (1994)
- Diletti E, Hauschke D, and VW Steinijans Sample size determination for bioequivalence assessment by means of confidence intervals Int J Clin Pharm Ther Toxicol 29/1, 1–8 (1991)
- Hauschke D, Steinijans VW, Diletti E, and M Burke Sample Size Determination for Bioequivalence Assessment Using a Multiplicative Model
- J Pharmacokin Biopharm 20/5, 557–61 (1992)
- S-C Chow and H Wang On Sample Size Calculation in Bioequivalence Trials J Pharmacokin Pharmacodyn 28/2, 155–69 (2001) Errata: J Pharmacokin Pharmacodyn 29/2, 101–2 (2002)
- DB Owen

A special case of a bivariate non-central t-distribution Biometrika 52, 3/4, 437–46 (1965)

μ vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012



References

LA Gould

Group Sequential Extension of a Standard Bioequivalence Testing Procedure J Pharmacokin Biopharm 23/1, 57–86 (1995)

DOI: 10.1007/BF02353786

- Tóthfalusi L, Endrényi L, and A Garcia Arieta Evaluation of Bioequivalence for Highly Variable Drugs with Scaled Average Bioequivalence Clin Pharmacokinet 48/11, 725–43 (2009)
- RV Lenth

Two Sample-Size Practices that I don't recommend Joint Statistical Meetings, Indianapolis (2000) http://www.math.uiowa.edu/~rlenth/Power/2badHabits.pdf

- Hoenig JM and DM Heisey The Abuse of Power: The Pervasive Fallacy of Power Calculations for Data Analysis The American Statistician 55/1, 19–24 (2001) <u>http://www.vims.edu/people/hoenig_jm/pubs/hoenig2.pdf</u>
- P Bacchetti

Current sample size conventions: Flaws, harms, and alternatives

BMC Medicine 8:17 (2010)

http://www.biomedcentral.com/content/pdf/1741-7015-8-17.pdf

- Jones B and MG Kenward Design and Analysis of Cross-Over Trials Chapman & Hall/CRC, Boca Raton (2nd Edition 2000)
- Patterson S and B Jones Determining Sample Size, in: Bioequivalence and Statistics in Clinical Pharmacology Chapman & Hall/CRC, Boca Raton (2006)
- SA Julious

Tutorial in Biostatistics. Sample sizes for clinical trials with Normal data Statistics in Medicine 23/12, 1921–86 (2004)

- Julious SA and RJ Owen Sample size calculations for clinical studies allowing for uncertainty about the variance Pharmaceutical Statistics 5/1, 29–37 (2006)
- SA Julious
 Sample Sizes for Clinical Trials
 Chapman & Hall/CRC, Boca Raton (2010)
- D Labes *Package 'PowerTOST'* Version 0.9-2 (2011-12-24) <u>http://cran.r-</u> project.org/web/packages/PowerTOST/PowerTOST.pdf

ε χ ε

ε In vitro in vivo Correlation (IVIVC), Biowaivers & Statistical Aspects of Bioequivalence
 π Pharma Edge in Drug Product Development | Mumbai, 27 January 2012