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University of Iowa
Co-Chair SNMMI Clinical Trials Network

SNMMI Annual Meeting June 9, 2014



CLINICAL TRIALS NETWORK

# CTN Mission: Facilitate the use of molecular imaging radiopharmaceuticals in clinical trials

- Ensure quality imaging is conducted in drug development clinical trials
- Facilitate access to investigational radiopharmaceuticals, including PET and SPECT agents
- Provide education and training for molecular imaging professionals performing clinical research
- Develop partnerships to enhance use of new radiopharmaceuticals

# SNMMI/CTN Ga68-related Activity

- Bi-annual meetings to raise awareness
- Initial focus on identifying best agent
- More recently:
  - Common end-product specifications
  - Standardized protocols
  - Helping new sites
    - (IND template, consent forms, data forms)
  - Obtained orphan drug designation for DOTATOC
  - Assisting commercialization

# Orphan Drugs

The FDA Orphan Drug Designation program provides orphan status to drugs and biologics which are defined as those intended for the safe and effective treatment, diagnosis or prevention of rare diseases/disorders that affect fewer than 200,000 people in USA (not more than 5 in 10,000 in EU)

- Fewer subjects needed in pivotal trial
- Application fees are waived
- Eligible for FDA grant funding
- Designation does not mean approved for clinical use
- Designated indication: management of patients with known disease

### SNMMI/CTN Plan for Ga68 DOTATOC

- NDA approval of DOTATOC
- Waive exclusivity
- Help sites obtain aNDA

### **Implications**

Other sites can obtain DOTATOC aNDA

### **Compounding Model**

- Companies can develop kits and seek NDA for kits
- Pharmacies will be able to compound and distribute

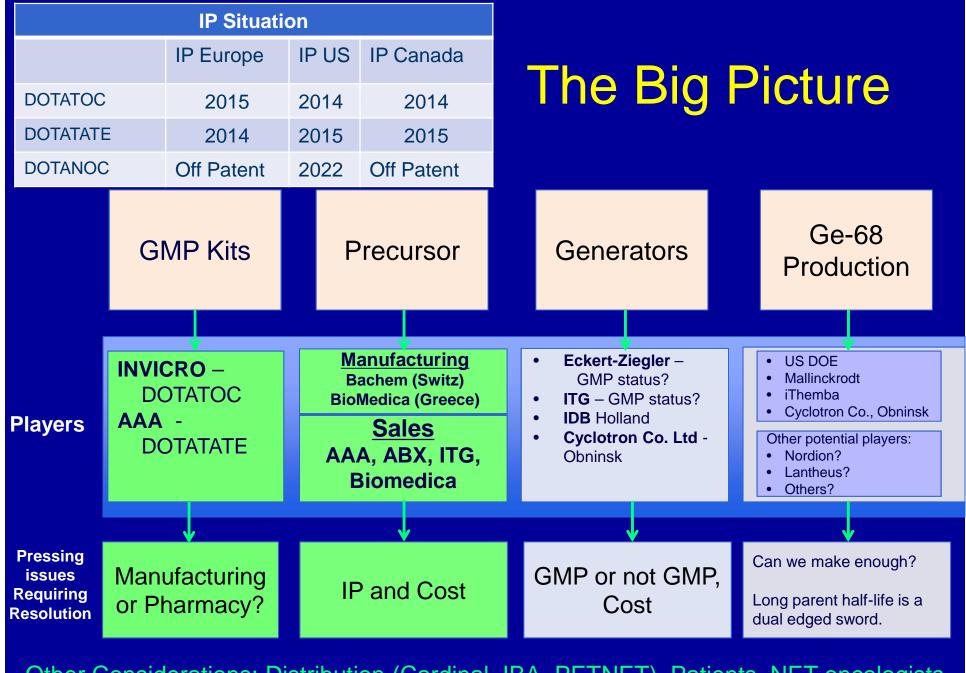
# **Current North American Activity**

- DOTATOC
  - Iowa, UCSF, JHU (MGH, Wash U, Mt. Sinai, U Penn ...)
- DOTATATE
  - Vanderbilt, UCLA, NIH, RadioMedix, Stanford
     (MD Anderson, LSU ...)
- DOTANOC
  - Indiana, Edmonton

# Cost Recovery

- FDA believes that in most cases the cost of an investigational drug in a clinical trial intended to support a marketing application is an ordinary cost of doing business.
- The purpose of permitting charging for an investigational drug in a clinical trial is to permit a sponsor to recover the costs of making certain drugs when clinical trials could not be conducted without charging because the cost of the drug.
- A sponsor authorized to charge for its drug in a clinical trial can only recover its <u>direct costs</u>.

Charging for imaging is outside the purview of FDA

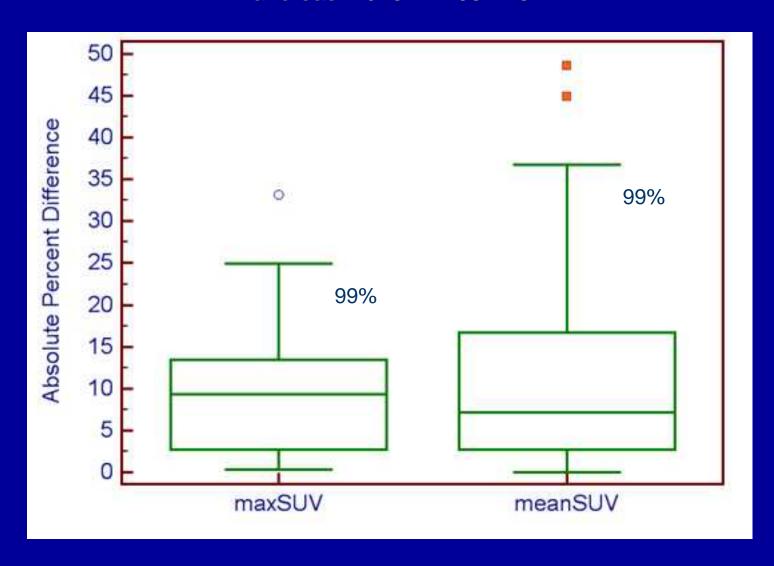


Other Considerations: Distribution (Cardinal, IBA, PETNET), Patients, NET oncologists,

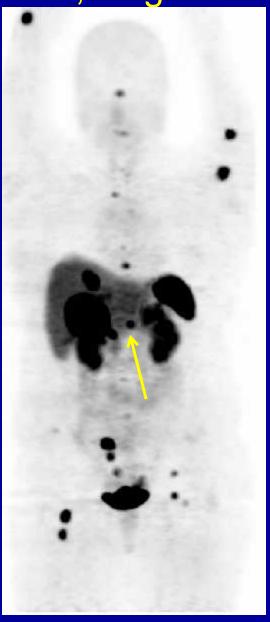
Y Menda, LL Boles Ponto, M Schultz, GKD Zamba, GL Watkins, DL Bushnell, MT Madsen, JJ Sunderland, MM Graham, TM O' Dorisio, MS O' Dorisio.

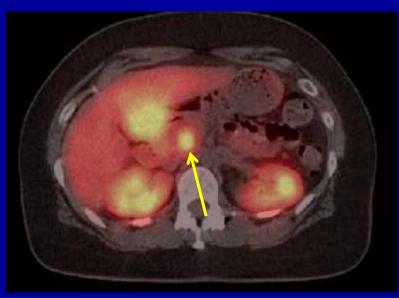
\*\*Repeatability of Ga-68 DOTATOC PET Imaging in Neuroendocrine Tumors.\*\*

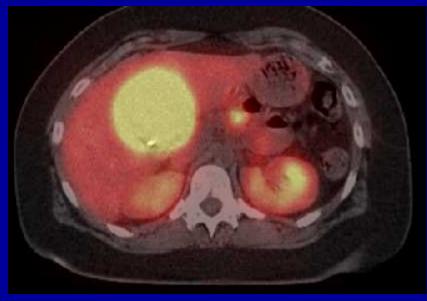
Pancreas. 2013 v42:937-43.



Unknown Primary with Metastatic NET to Liver and Bones, Negative Octreoscan and CT for Primary







### Scan Results (N=127)

#### Diagnosis of NET

• Ga-68 DOTATOC positive in only (3/27) patients presenting with symptoms / labs suggestive of elevated serotonin without diagnosis of NET (2 false positive, 1 unconfirmed)

#### **Unknown Primary**

 Ga-68 DOTATOC identified primary tumor in 16/25 pts with metastatic disease, 11 true positive. 2 false positive 3 unconfirmed. 9 false negative.

Initial staging & Restaging (75)

Funding is provided via a Cost-Recovery IND

#### **Presentations from Industry and Academia**

- 1. Ronald Walker, Vanderbilt University, Nashville, TN
- 2. Andre lagaru, Stanford, Palo Alto, Ca
- 3. Sherly Mosessian, UCLA, Los Angeles, Ca
- 4. Jim Fletcher, Indiana University, Indianapolis
- 5. Harshad Kulkarni, Zentralklinik, Bad Berka, Germany
- 6. Ebrahim Delpassand, Excel Diagnostics, Houston, Tx
- 7. Dirk Becker, Eckert & Ziegler, Germany
- 8. Izabela Tworowska, Radiomedix, Houston, Tx
- 9. Maurizio Mariani, Advanced Accelerator Applications, France



## <sup>68</sup>Ga-DOTATATE PET/CT - Vanderbilt

IND 111972

clinicaltrials.gov NCT01396382

Table 1: Neuroendocrine tumor types (n=97):

Primary Tumor Type	Number of Patients
Lung	7
Stomach/prox duodenum/pancreas	22
Mid-gut	44
Hindgut/rectal	3
Other	5
Metastatic disease from unknown	16
primary	

## <sup>68</sup>Ga-DOTATATE PET/CT - Vanderbilt



- Safety, efficacy and non-inferiority study
- Toxicity (serial EKG, CMP, vital signs) before and after scans – no significant toxicity observed
- Compared to conventional imaging (CT, MRI, <sup>111</sup>In-Octreotide) for impact on care
- Independent readings for reproducibility
- Impact: none, minor (e.g. change in existing treatment plan) or major (e.g. change to new treatment plan

## <sup>68</sup>Ga-DOTATATE PET/CT - Vanderbilt

### Impact on Care vs. all CI:

•No impact: 55 (56.7%)

•Impact: 42 (43.3%)

•Minor impact: 10 (10.3%) – most commonly a change in

surgical plan

•Major impact: 32 (33.0%) – most commonly to refer patients to PRRT or to convert patients to a surgical plan.

•Number of patients referred to PRRT as a result of <sup>68</sup>GaDOTATATE: 15 (15.5%)

•Number of patients where PRRT referral was cancelled (due to poor uptake): 2 (2.1%)

•Number of patients referred for PRRT with positive <sup>68</sup>GaDOTATATE and negative <sup>111</sup>InOctreotide: 5 (5.2%)





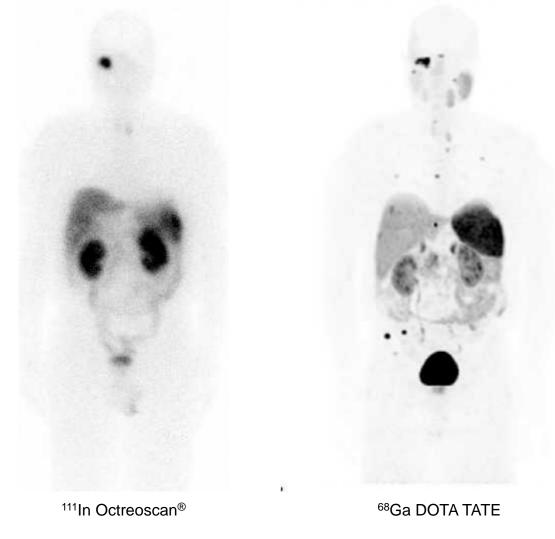
### <sup>68</sup>Ga DOTA TATE PET: Current Status at Stanford

- 33 patients enrolled to-date since Jan 2014
- IND approved as EAP for 200 participants
- Cost recovery mechanism in place
- Cannot bill patients directly per local IRB
- Cannot bill MediCare/MediCal
- Professional fee waived
- > Did not see a decrease in the price of precursor yet
- ➤ Almost completely replaced <sup>111</sup>In Octreoscan®
- Roughly ¾ of claims reimbursed by insurance









- Changes in management in 15 of the 20 patients who had <sup>111</sup>In-Octreoscan<sup>®</sup>
- ➤ Will apply for funding to do <sup>68</sup>Ga DOTA TATE PET/MRI





### UCLA- 68Ga-DOTATATE PET/CT studies



#### Clinical

- Martin Auerbach M.D.
- Ken Herrmann M.D.

#### **Manufacturing**

(Director of cyclotron and - Shaojun Zhu M.S. radiochemistry facility)

#### Regulatory

- Johannes Czernin M.D. Sam Sadeghi Ph.D Sherly Mosessian Ph.D



# Regulatory summary

- 1. UCLA IND (Reference to Vanderbilt IND)
  - 12/18/12: IND was approved with cost recovery.
  - By March, 2014, 100 patients were imaged.
  - FDA did not grant request to increase number of patients beyond 100 as part of a Phase1IND
- UCLA Expanded Access IND (Content similar to Stanford Expanded Access IND)
  - 05/01/14: UCLA Expanded Access IND was approved with cost recovery to enroll 300 patients.
  - Currently in the process of finalizing IRB amendment approval and enrolling human subjects.

# Study Aim/Design



 NOPR like design to determine the impact of <sup>68</sup>Ga-DOTATATE PET/CT on the management of patients with NETs

Pre Scan Questionnaire PostScan Questionnaire

NET

NET

68Ga-DOTATATE PET/CT

Pre Scan Questionnaire	Post Scan Questionnaire
Staging/Restaging	Post Scan M1 Suspicion
Prior Therapy	Change of M1 Suspicion
Tumor Location/Grade/Stage	New Metastases?
M1 Suspicion	Intended Treatment
Intended Treatment	Treatment Changes?



# Management changes

Major management changes: 28%

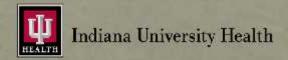
Major change type	N (% change)
Away from surgery	7/61 (11.5 %)
To surgery	8/61 (13.1%)
From treatment to no treatment	1/61
From no treatment to treatment	1/61

Overall management changes: 31/61 (51%)

# First year Experience with <sup>68</sup>Ga DOTA-NOC

James W. Fletcher, Mark Green, Mark Tann, Mary Maluccio, Carla Mathias, Gary Hutchins

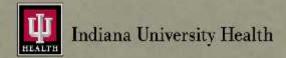
Department of Radiology and Imaging Sciences
Indiana University School of Medicine
Indiana/Purdue University in Indianapolis





# 68Ga DOTA-NOC

- Expanded Access IND # 117,255
- Source of <sup>68</sup>Ga has been Eckert-Ziegler generator
- Initial estimate of 30 patients per year over 4-years
- Actual enrollment Year 1 → 39 patients





# Preparation

- All doses met specified release criteria
- Doses averaged 4.7 ± 0.6 mCi
- Production time: elution→ dose release: 46 ± 5
  minutes
   (usually 44 minutes, but three doses delayed by need to re-filter or to repeat endotoxin test because device issue)
- Radiochemical purity: 98.2 ± 0.7%
- Virtually no <sup>68</sup>Ge breakthrough 3 x 10<sup>-7</sup> %





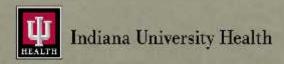
### Indications:

- 1. Patients with neuroendocrine cancers who are potentially candidates for treatment by multivisceral transplant.
- 2. Patients in whom a liver mass has been upon biopsy found to be a neuroendocrine tumor (presumably metastatic), and whose treatment requires detection of the unknown primary tumor and/or definition of the extent of disease.
- 3. Patients in whom prior, clinically indicated, <sup>111</sup>In-Octreoscan SPECT has failed to address the clinical diagnostic need, and for whom the superior resolution and target/background contrast of a <sup>68</sup>Ga-DOTA-NOC PET/CT study is clinically judged to be in the patient's best interest for advancing decisions about their SCHOOL OF Indianal Medical Calledore.



### Patient INdications

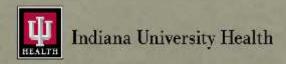
- Use of <sup>68</sup>Ga-DOTA-NOC PET/CT to locate a primary lesion in patients with liver metastases and an unknown primary → 5 patients
  - 2 had disease in liver but no evidence of primary site
    - Lack of occult primary led to change in surgical management in 1
  - 3 had previously unknown occult primaries located by study (2 pancreas, 1 small bowel)
    - Both PNET patients went on to get systemic treatment which was a change in management





### Patient INdications

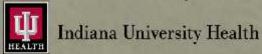
- Use of <sup>68</sup>Ga-DOTA-NOC PET/CT to determine eligibility for multivisceral transplant → 10 patients
  - Six (6) patients had evidence of previously unknown disease outside the abdomen, making them ineligible for multivisceral transplant under our current eligibility criteria.
    - Two (2) patients had occult asymptomatic bone metastases
    - Four (4) patients had disease in the lungs or extraabdominal lymph node basins (i.e. mediastinum)





### Patient INdications

- Thirteen (13) patients underwent <sup>68</sup>Ga-DOTA-NOC PET/CT to evaluate extent of disease for one of several reasons
- Five (5) patients had considerably greater disease burden than expected.
- Three (3) patients had disease burden as predicted, or less than predicted.
- Two (2) patients had recurrent disease detected by <sup>68</sup>Ga-DOTA-NOC PET/CT, and a change in management based on that result.
- Three (3) patients had negative <sup>68</sup>Ga-DOTA-NOC PET/CT scans, prompting a change in management and evaluation of other causes of presenting symptoms.





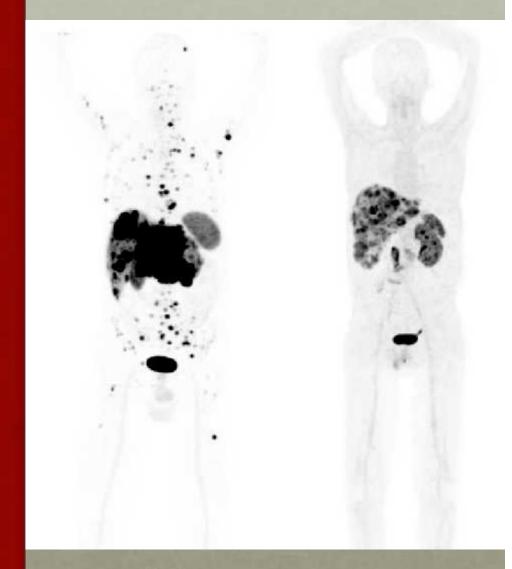
# Summary

- No adverse reactions with exception of transient 2-5 minute nausea in ~50% of patients
- No adverse events
- No drop outs
- High quality images that provided information that exceeded what was available from conventional imaging (<sup>111</sup>In-Octreotide, contrast enhanced CT)



### Sample Images

- Images obtained approximately 1hour after injection on Siemens mCT device. Typically with contrast enhancement of CT (Isoview 370).
- 3-minutes per bed position.

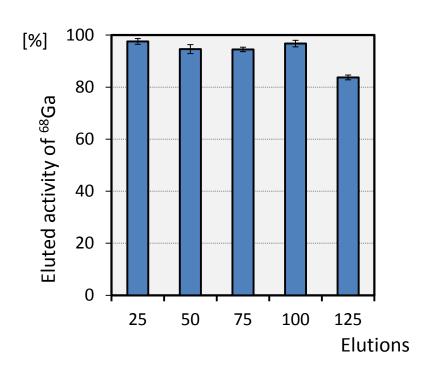






#### Update on <sup>68</sup>Ga-DOTATATE (GalioMedix<sup>TM</sup>) and <sup>68</sup>Ge/<sup>68</sup>Ga generators (ITG GmbH)

- RadioMedix Inc. Phase I/II IND application (IND 117289)
   (Compounding, radiolabeling, QC validation, IND submission)
- Prepared ~ 110 doses
- 1-2 doses of <sup>68</sup>Ga –DOTATATE per day (PET/CT imaging: 1-3 patients)
- <sup>68</sup>Ge/<sup>68</sup>Ga generator ITG GmbH (30 mCi); 50mCi
- Consistent and reliable elution profiles;
   Elution yield >80% on calibration date and during shelf life of generators



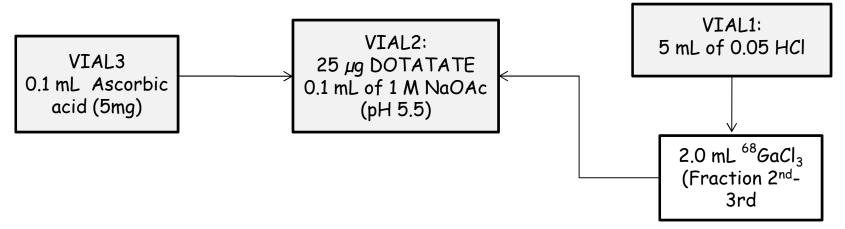
#### ITG GmbH <sup>68</sup>Ge/<sup>68</sup>Ga generators:

Novel GMP-grade generators with shelf life of 12 months or 250 elutions DMF authorization – final stage

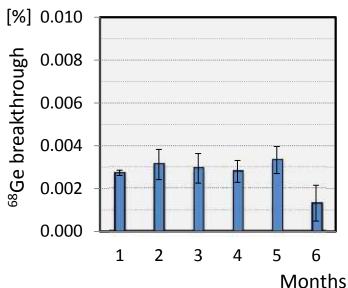


#### Simplified protocol for the dose preparation using ITG <sup>68</sup>Ge/<sup>68</sup>Ga generators

- No need for pre-purification /pre-concentration of <sup>68</sup>Ga using ion exchange resin
- No need for purification of the final dose



Required specification	Observed parameters		
Dose: 4 – 16 mCi	7.34 ± 3.4mCi		
RCP > 95% as determined by iTLC	98.998 ± 1.1%*		
Ge-68 content <0.01%	0.00265 ± 2.05E-03 %		





#### RadioMedix Inc. - Distribution and compounding services

#### RadioMedix Inc. - ITG GmbH (Germany) Business Partnership

•US Exclusive distribution rights for the ITG GmbH products:

<sup>68</sup>Ge/<sup>68</sup>Ga generators IQS <sup>68</sup>Ga Fluidic labeling module DOTATOC

> Ac<sup>225</sup>/Bi<sup>213</sup> generators and W<sup>188</sup>/Re<sup>188</sup> generators

- •68Ga program using ITG GmbH generators has been initiated in US clinical centers and networks of radiopharmacies
- •Offer leasing plan for <sup>68</sup>Ge/<sup>68</sup>Ga generators (6, 12, 18 months) RadioMedix Inc.
- Provide support and on –site training
- Compound and distribute the DOTATOC kits

#### Izabela Tworowska itworowska@radiomedix.com

Wednesday, June 11th-Radiopharmacy, Abstract 612







# Kit for the preparation of <sup>68</sup>Ga-labeling of sst analog peptides





### A sterile, lyophilised, easy-to-use kit approach for the preparation of <sup>68</sup>Ga-labeling of sst analog peptides

- One of the barriers to more widespread use of Ga-68 PET is the absence of sterile, lyophilised easy-to-use kits for the direct preparation of <sup>68</sup>Ga drugs.
- Currently the preparation of <sup>68</sup>Ga-radiopharmaceuticals implies articulate synthesis procedure and/or the use of synthesis modules which need **fully-equipped cGMP radiopharmacy.**
- Extensive quality controls of a product resulting from an extemporaneous production process are also required.
- Both the synthesis set-up and the relevant quality controls are currently under the responsibility of the individual clinical centres.
- Conversely, kit-type production allows a simple <sup>68</sup>Ga-labeling procedure based on direct reconstitution of a pre-formulated GMP kit, not requiring cGMP manufacturing processing of the eluate or additional filtration or purification steps.
- Kit-type production of <sup>68</sup>Ga-radiopharmaceutical would definitively make <sup>68</sup>Ga the PET analogue of <sup>99m</sup>Tc.



# No need for cGMP, radiochemistry modules and extensive QC

**Kit approach:** production of <sup>68</sup>Ga-DOTATATE or <sup>68</sup>Ga-DOTATOC injectable solution by reconstitution of a pre-formulated GMP kit adding directly the eluate from a <sup>68</sup>Ge/<sup>68</sup>Ga generator without the need of any automatic module (only an heating block is required) standardized





Straightforward and standardized reconstitution procedure



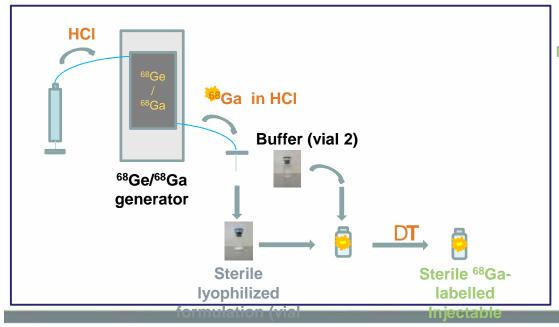
procedure

- Onerous equipment costs (module and analytical instruments) in cGMP environment
- Need for expert staff

Reduced Extensive QC performed

		locally
Test		Specifications
рН		3.2 – 3.8
Radiocher	mical Purity	
(ITLC)	% peak with	3%
Rf 0-0.1		

Standardized pharmaceutical product with controlled quality and wide availability for PET localization of primary and/or metastatic lesions of GEP-NETs 37





# <sup>68</sup>Ga kits are now freely available for clinical trials

- The kit-based approach developed by AAA for the preparation of <sup>68</sup>Ga-Dotatate and <sup>68</sup>Ga-Dotatoc satisfies the necessity of a standardized pharmaceutical product with controlled quality and wide availability.
- AAA is actively pursuing development of the kits in both USA and Europe for the diagnosis and the management of GEP-NETs.
- The <sup>68</sup>Ga-Dotatate kit is the ideal companion diagnostic agent of AAA Lutathera<sup>®</sup>, currently in Phase III (Netter I study) for the treatment of mid-gut carcinoid, with which it shares the same chemical features.
- The pharmaceutical development of both kits is completed.
- Following the activation of the relevant INDs, the kit can be made available for free for Investigator Driven Studies of relevant interest.

# **Update:**



# Generator now approved

### Status Quo <sup>68</sup>Ga: Registration of the Eckert & Ziegler GMP <sup>68</sup>Ge/<sup>68</sup>Ga-Generator in the EU



SNMMI 2014 CTN Meeting

St. Louis, MO, USA June 9<sup>th</sup> 2014 Update June 19th 2014: Generator is approved in several European Countries

Dr. Dirk W. Becker
Eckert & Ziegler Radiopharma GmbH
Berlin, Germany

# Ge<sup>68</sup>/Ga<sup>68</sup> Generators supplied by Eckert & Ziegler







Cyclotron Obninsk, Russia

**E&Z IGG100** 

Chemical grade only



EZR pharm. Grade

#### **GMP**

Update June 19th 2014: Generator is approved for registration in several European Countries

# GMP certificate of the Eckert & Ziegler Ge<sup>68</sup>/Ga<sup>68</sup> Generator



Radiopharma



#### **GMP** certificate was issued in June 2012

#### Landesamt für Gesundheit und Soziales



Zertifikat-Nr./Certificate no: 2012/01/Eckert & Ziegler Radiopharma

#### CERTIFICATE OF GMP COMPLIANCE OF A MANUFACTURER

#### Part 1

Issued following an inspection in accordance with Art. 111 (5) of Directive 2001/83/EC or Art. 15 of Directive 2001/20/EC

The competent authority of GERMANY confirms the following:

The manufacturer

Eckert & Ziegler Radiopharma GmbH

Site address

Robert-Rössle-Straße 10 13125 Berlin

has been inspected under the national inspection programme in connection with manufacturing authorisation no. 5373/Eckert & Ziegler Radiopharma/1 in accordance with Art. 40 of Directive 2001/83/EC or Art. 13 of Directive 2001/20/EC transposed in the following national legislation:

Sect 13 para 1 Arzneimittelgesetz (German Drug Law)

#### A) Human Medicinal Products

#### 1 MANUFACTURING OPERATIONS

1.1	Sterile products					
	1.1 Aseptically prepared (list of dosage forms)					
	1.1.1.6 other aseptically prepared products: Radionuclide-Generators					
1.6	Quality Control testing					
	1.6.3 Chemical/Physical					

Any restrictions or clarifying remarks related to the scope of this certificate for part 2 A) Human Medicinal Products:

#### To 1.1.1.6:

<sup>68</sup>Ge/<sup>68</sup>Ga-Generators with active substance <sup>68</sup>Ge/<sup>68</sup>Ga-chloride for radiolabelling of precursors for diagnosis with Positron-Emission-Tomography

#### GMP grade <sup>68</sup>Ge/<sup>68</sup>Ga-Generator by EZR



- The GMP grade generator is distributed by EZR only
- It was developed between 2008 and 2011.
- The production site is located north of Berlin, Germany
- UPDATE June 19<sup>th</sup> 2014:

The GMP grade <sup>68</sup>Ge/<sup>68</sup>Ga-generator is now approved for registration in several European Countries. MA will be

issued and DMF in the US will be filed

# Why and How to Register a Radionuclide Generator as a Drug?



- According to EU Directive 2001/83/EC, Ch. I, Art. 6.2 before placing a radionuclide generator on the market a marketing authorization has to be issued by the competent authorities of that member state.
- According to the German Medicinal Products Act, 1. Ch., Sect 4, Art. 8
  are radionuclide generator considered as radiopharmaceuticals and
  therefore need to be registered (mandatory)
- According to the Guideline on Radiopharmaceuticals EMEA/CHMP/QWP/306970/2007, Ch. 4.1: the mother and the daughter radionuclides in a radionuclide generator, both are to be considered as active ingredients (mandatory)
- In the Pharm. Eu. there is a monograph about "Gallium (Ga68) solution for radiolabelling" (2013/2464)



(mandatory)