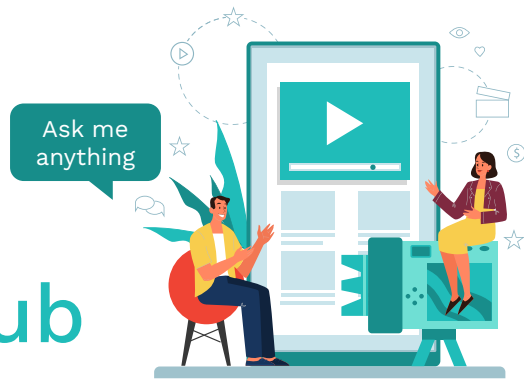


# Virtual journal club



## **Regulatory Pathways for Qualification and Acceptance of Digital Health Technology-Derived Clinical Trial Endpoints: Considerations for Sponsors**



Wednesday, October 30, 2024

11:00am ET



**Elena Izmailova**

*Chief Scientific Officer*  
Koneksa Health



**Jessie Bakker**

*VP Clinical Development*  
Koneksa Health



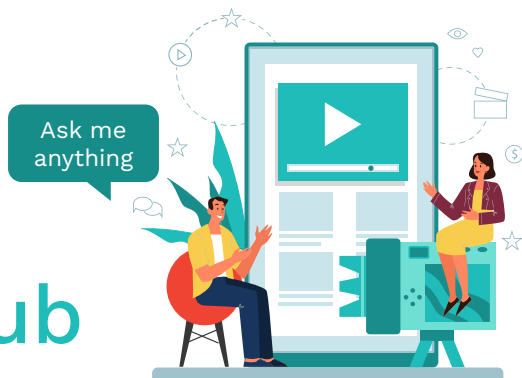
**Benjamin Vandendriessche**

*Chief Delivery Officer*  
Digital Medicine Society (DiMe)  
Moderator

# But first, housekeeping

- Please note today's session is being recorded
- To ask a question for discussion during Q&A, please:
  - Either 'raise your hand' in the participant window and moderator will unmute you to ask your question live, or
  - Type your question into the chat box
- Slides and recording will be available after today's session

# Virtual journal club



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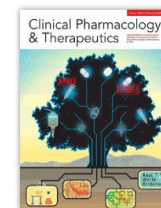
REVIEW

## Regulatory Pathways for Qualification and Acceptance of Digital Health Technology-Derived Clinical Trial Endpoints: Considerations for Sponsors

Jessie P. Bakker<sup>1</sup>, Elena S. Izmailova<sup>1,\*</sup> , Aude Clement<sup>2</sup>, Steven Hoffmann<sup>3</sup>, Christopher Leptak<sup>4</sup>, Joseph P. Menetski<sup>3</sup> and John A. Wagner<sup>1</sup>

<sup>1</sup>Koneksa Health, New York, New York, USA; <sup>2</sup>F.Hoffmann-La Roche Ltd, Basel, Switzerland; <sup>3</sup>Science Partnerships, Foundation for the National Institutes of Health, North Bethesda, Maryland, USA; <sup>4</sup>Greenleaf Health, Washington, District of Columbia, USA. \*Correspondence: Elena S. Izmailova ([elena@koneksahealth.com](mailto:elena@koneksahealth.com))

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Early View

Online Version of Record before inclusion in an issue

# Key Points

- Adoption of digital endpoints in a drug development pipeline can be achieved via the following regulatory pathways in the United States:
  - Qualification via the **Drug Development Tool** (DDT) program
  - Acceptance via the **Investigational New Drug** (IND) pathway
- The digital endpoint evidentiary package includes:
  - Verification and validation evidence supporting the sDHT used for data capture; *and*
  - Evidence supporting use of the measure as a **digital biomarker** *versus* an **electronic clinical outcome assessment** within the specified context of use
- Sponsors may select a sensor-based digital health technology that is:
  - An **FDA-regulated** medical device;
  - A data capture product **developed specifically for research** purposes; or
  - A **low-risk** general wellness product

# Attributes of the DDT vs IND pathways

**Qualification** via the drug development tool pathway

**Acceptance** via the investigational new drug pathway

Structured, multi-stage submission process

Application Phases

Initial submission with iterative agency interactions

Public transparency throughout

Confidentiality

Confidential until drug approval

Applicable to multiple drug candidates within the specified context of use

Scope

Applicable to a single or limited number of drug candidates

Burden and risks often shared across consortia or pre-competitive collaborations

Burden and Risk

Sponsor is responsible for all processes associated with implementation of the sDHT

# Digital biomarker vs eCOA evidentiary packages

*A defined characteristic that is measured as an indicator of normal **biological processes, pathogenic processes, or biological responses** to an exposure or intervention, including therapeutic interventions*

## DIGITAL BIOMARKER EVIDENTIARY PACKAGE

### *Evidence Supporting the Biomarker*

- Biological rationale
- Association between the biomarker and a clinically-relevant outcome
- Technical performance of the measurement method

### *Evidence Supporting the sDHT*

- Hardware, firmware, software, and technical specifications
  - Verification testing
  - Validation of the data processing algorithms
- End-to-end data flow: collection, storage, transmission, and archiving
- Operational considerations including participant instructions and usability
  - Data management and statistical analysis plan
  - Controls ensuring data privacy, security, and retention
    - Data attribution
- Consideration of risks including clinical risks and privacy risks
  - Product agnostic approaches, where applicable
  - Raw/sample-level data access, where applicable

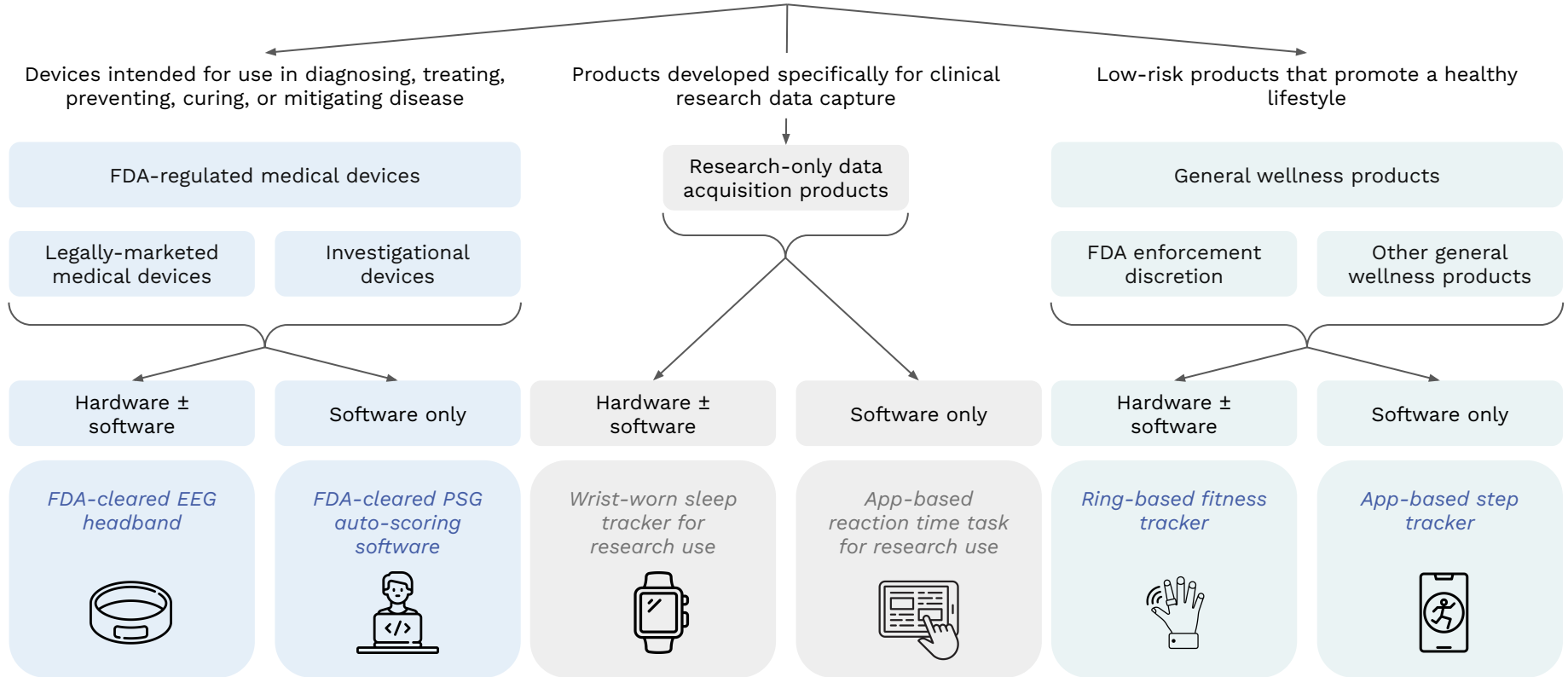
*An outcome that describes or reflects how an individual **feels, functions** or **survives**, assessed through report by a clinician, a patient, a non-clinician observer or through a performance-based assessment*

## eCOA EVIDENTIARY PACKAGE

### *Evidence Supporting the eCOA*

- Disease features meaningful to patients or carepartners
  - Ability to capture clinical outcome of interest
- Ability of participants to understand instructions and perform tasks
  - Scoring method
  - Instrument's sensitivity to change
- Ability to interpret and communicate changes in scores

# sDHT regulatory categories





“ ”

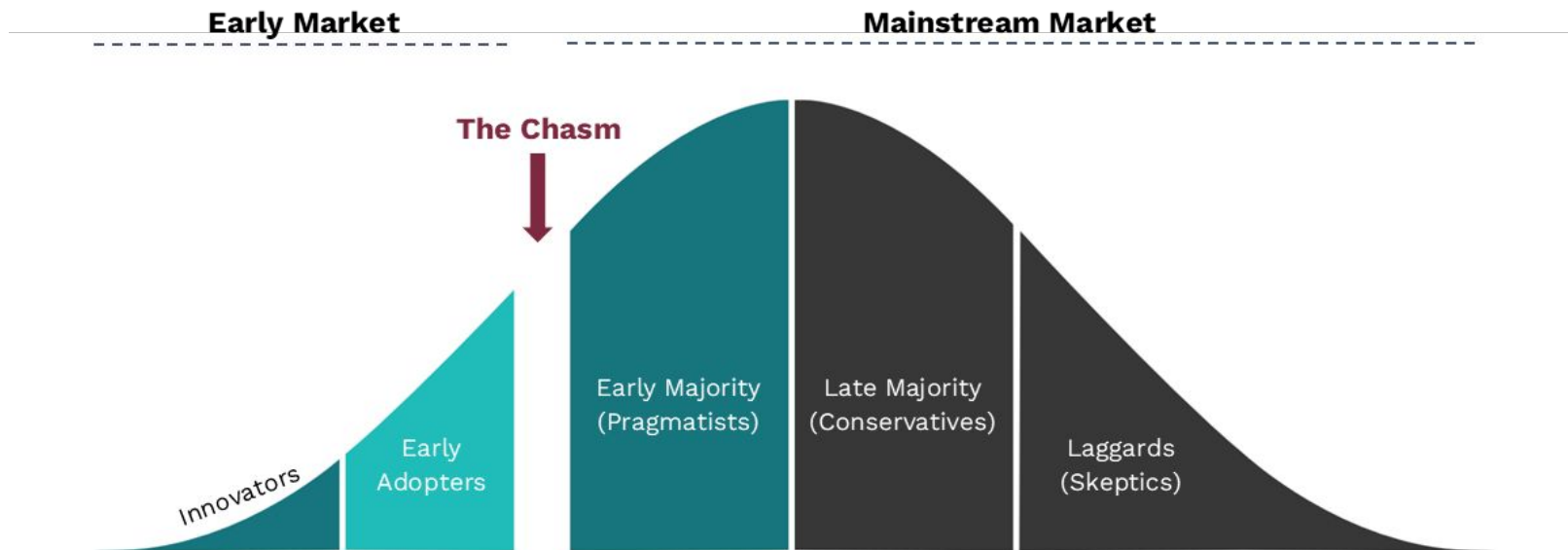
*The application of sDHTs in drug development represents an interesting intersection of the pharmaceutical, medical device, and regulatory sciences. Multiple regulations and FDA guidance documents govern this intersection, raising many questions around identifying an appropriate regulatory pathway, selecting a fit-for-purpose sDHT from the wide variety of regulated and non-regulated products available, and the evidentiary package required to support both the endpoint itself and the sDHT used to capture it.*

Bakker JP, Izmailova ES, Clement A, Hoffmann S, Leptak C, Menetski JP, Wagner JA. Regulatory Pathways for Qualification and Acceptance of Digital Health Technology-Derived Clinical Trial Endpoints: Considerations for Sponsors (2024) *Clinical Pharmacology & Therapeutics* doi: 10.1002/cpt.3398.



Q&A

# A “How to Guide” to accelerate sDHT adoption in clinical trials



# Scaling Digital Health Globally: Navigating National Pathways for Patient Access

**International Regulatory Pathways for Digital Health Technologies**



November 19, 2024  
@ 11 a.m. ET  
Virtual



**Miguel Amador**

*Partner/Chief Innovation Officer  
Complear*



**Jeroen Bergmann**

*Professor, Head of Dept of Technology  
and Innovation  
University of Southern Denmark /  
University of Oxford*



**Brian Flatley**

*VP Consulting Services  
S3 Connected Health*



**Shani Frenkel**

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*Taskforce Lead for Internationalization &  
European Topics  
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Gesundheitsversorgung*



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*Research Assistant at CeRGAS Bocconi  
Università Bocconi*

# Thank you

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