

# Can Study Protocols Protect Patients with Liver Diseases from Serious DILI?



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# Disclosures

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**Consultant-Advisor:** Abbvie, BMS, Excalenz, Janssen, Genentech-Roche, Gilead, Globeimmune, HepQuant, HEPATIQ, Immuron, Intercept, Merck

**NIH NIDDK:** Member of DILIN DSMB and Executive Committee of LTCDS

**Speakers' Bureaus (CME Only):** Chronic Liver Disease Foundation (CLDF), Gastroenterology and Liver Association (GALA), ViralEd

# Background

- Identification of drugs or biologics with potential to cause serious, life-threatening DILI requires causality assessment and comprehensive testing for alternative etiologies in each suspected case<sup>1</sup>.
- Since idiosyncratic DILI is rare, prediction of the risk of serious DILI post-marketing relies on identification of cases of interest meeting Hy's Law criteria during phase II-III clinical trials<sup>2</sup>.
- Subjects with pre-existing, chronic liver diseases (CLDs), with or without cirrhosis, are challenging because current FDA guidance is based largely on criteria for studies that exclude subjects with abnormal liver tests<sup>3</sup>.
- CLDs do not increase overall susceptibility for DILI, but multiple exceptions suggest that additional examples will be identified in future clinical trials<sup>2</sup>.
- DILI in subjects with CLD is worrisome because subjects with reduced hepatic functional reserve are less likely to recover and more likely to die<sup>2,3</sup>.
- The probability of subjects with CLDs enrolling in clinical trials is increasing, especially in therapeutic trials targeting components of the metabolic syndrome (enriched for NAFLD), antimicrobials, specific CLDs, complications of cirrhosis and hepatocellular carcinoma.

<sup>1</sup>Avigan MI. Semin Liver Dis 2014; 34: 215-26

<sup>2</sup><http://www.fda.gov/downloads/Drugs/.../Guidances/UCM174190.pdf>

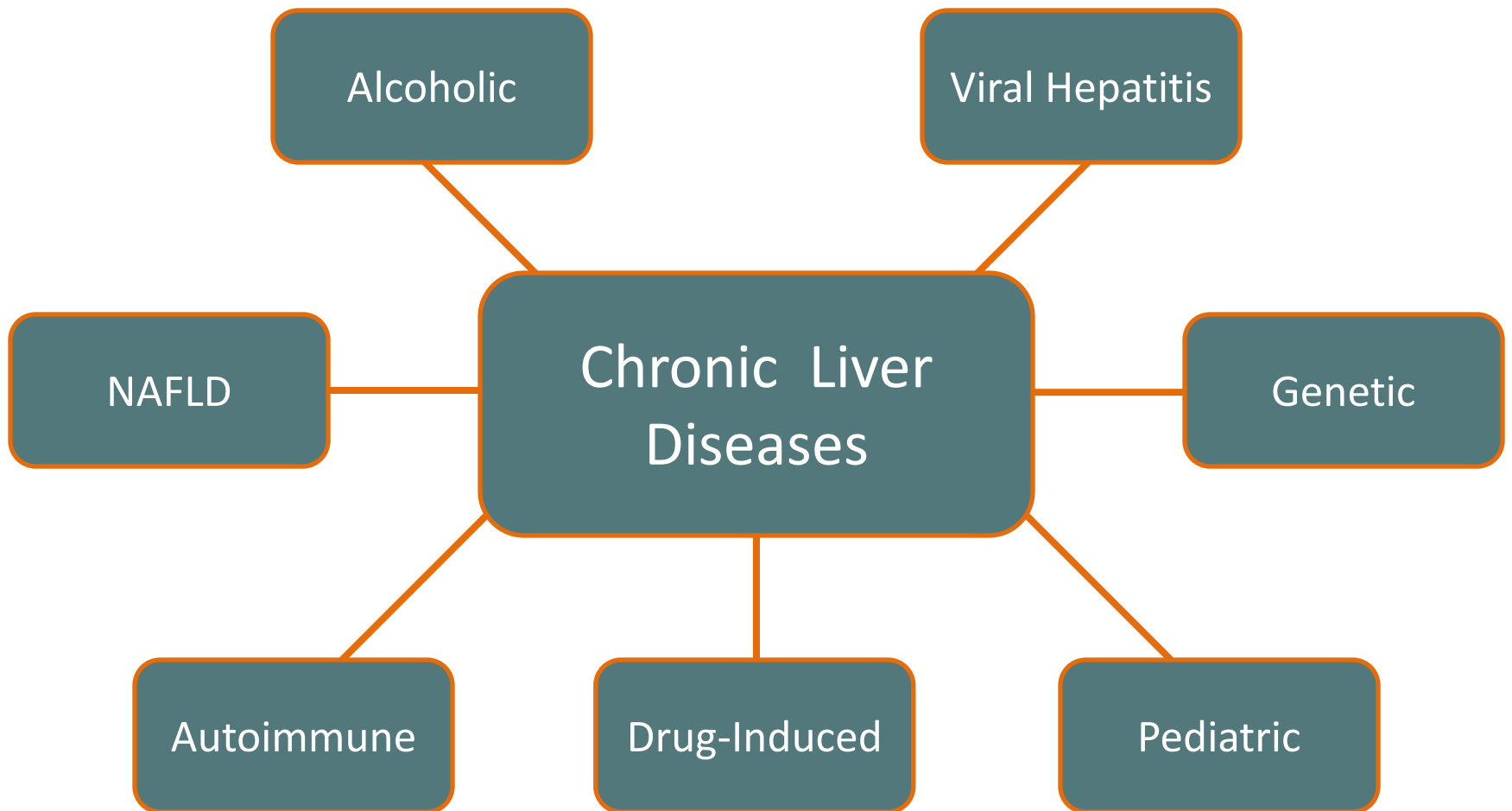
<sup>3</sup>Chalasonai N, et al Gastroenterology 2015; 148: 1340-52

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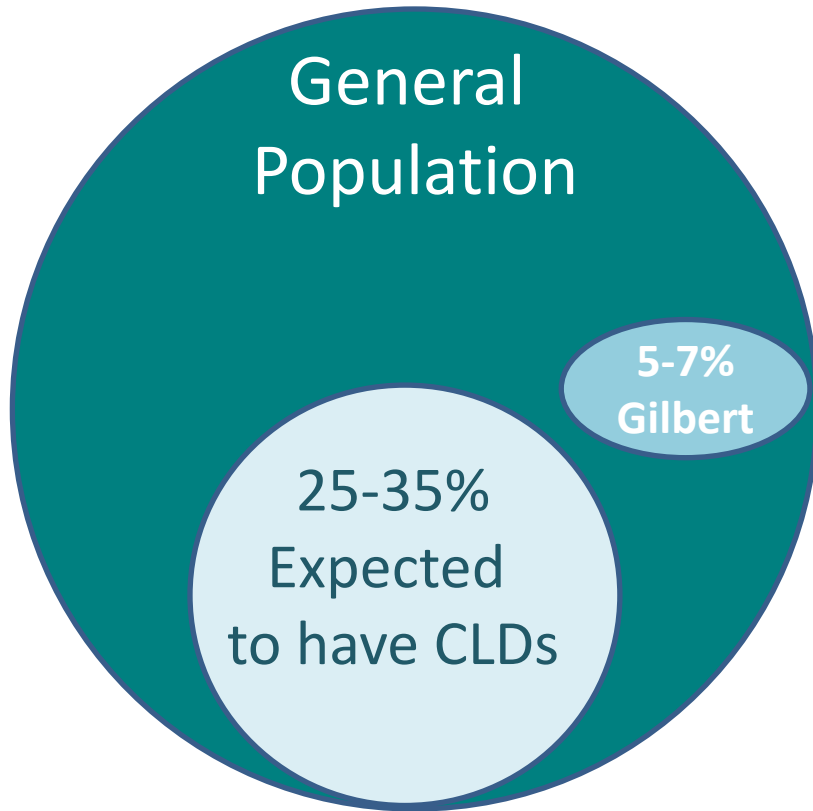
## Key Questions:

1. What is the probability of enrolling patients with CLDs, including cirrhotics, in drug development trials?
2. What are the risks of serious DILI and hepatic decompensation in subjects with CLDs?
3. How do protocols currently protect subjects with CLDs, including cirrhotics, from serious DILI?
4. What improvements in protocols can provide greater protection from serious DILI in patients with CLD, including cirrhotics?
  - a. Assessment pre-enrollment
  - b. Monitoring on treatment
  - c. Functional assessment of suspected DILI and stopping rules

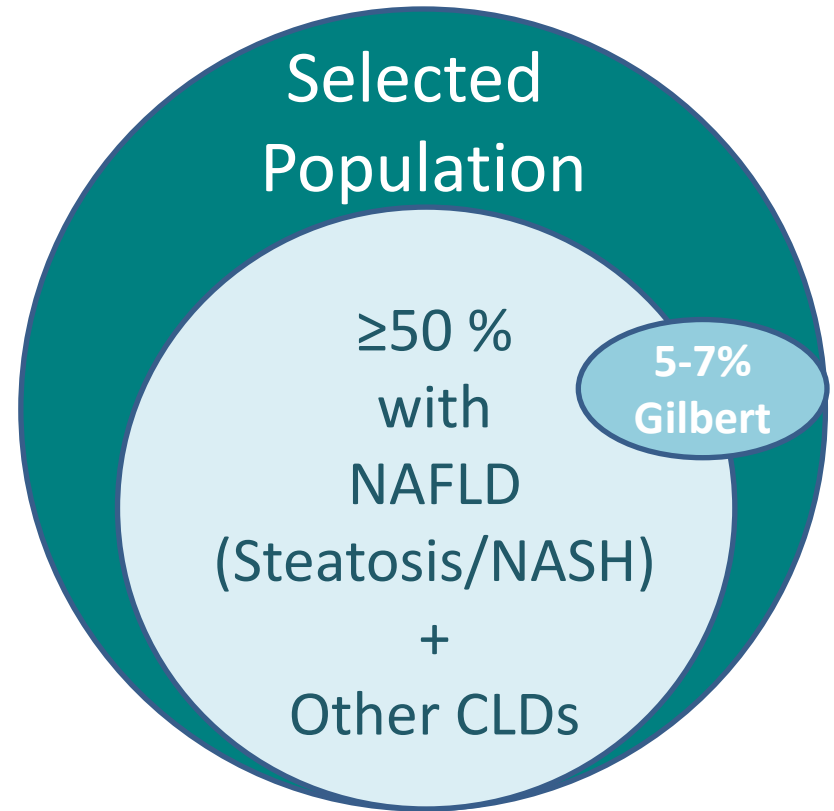
# Etiologic Spectrum of Chronic Liver Diseases with Risk of Progression to Cirrhosis



# Probability of Enrolling Americans with CLDs with or without Cirrhosis in Clinical Drug Trials



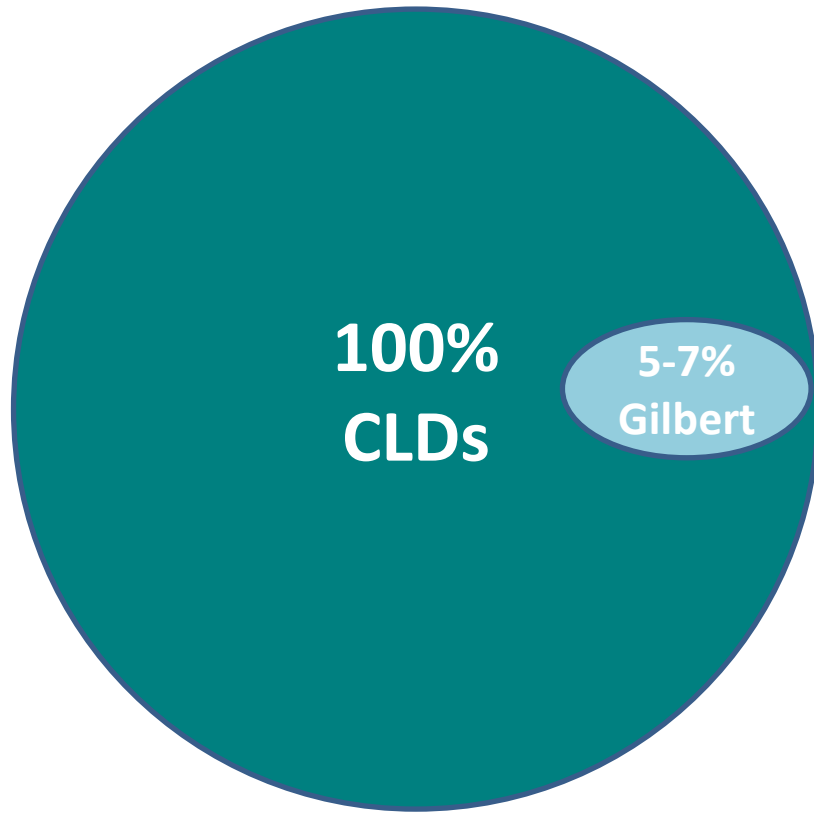
**General Drug Development**



**Drug Development**

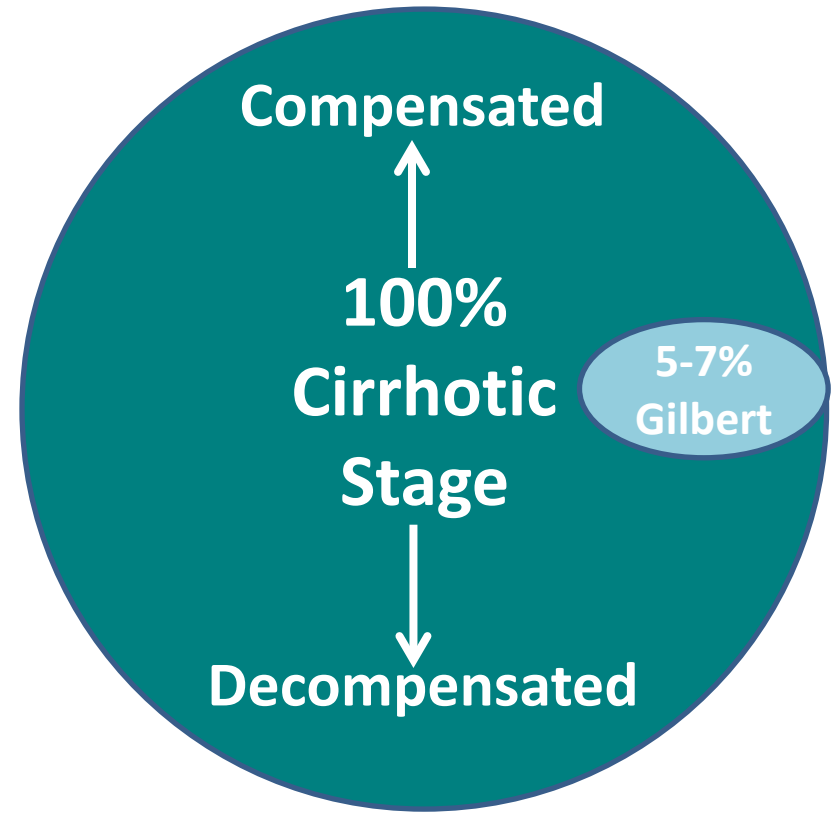
- Obesity
- DM-2
- Hyperlipidemia
- Hypertension
- Gout

# Certainty of Enrolling Americans with CLDs with or without Cirrhosis in Clinical Drug Trials



## Drugs for specific CLDs

- HBV±HDV, HCV±HIV, HEV
- NAFLD/NASH
- AIH, PBC, PSC
- Genetic



## Drugs for Cirrhosis/Complications

- Cirrhosis
- PVHTN
- Varices
- HE
- HCC
- Antifibrotics

# Cirrhosis: Global Prevalence per 100,000 Persons



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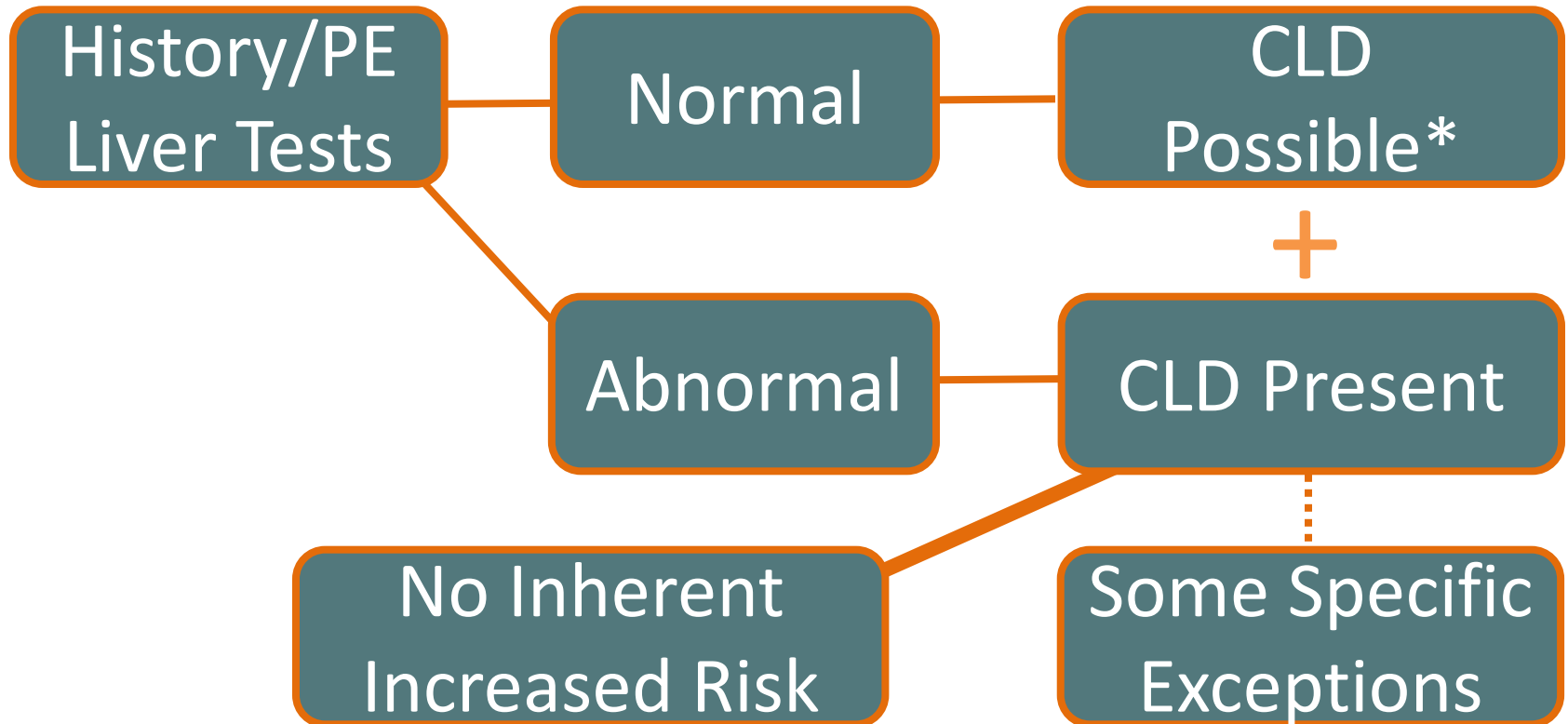


# Can Study Protocols Protect Patients with Liver Diseases from Serious DILI?

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# Risk of DILI in Subjects with CLDs? Increased Susceptibility?



\*CLDs with potential for Liver Tests WNL: HBV, HCV, NAFLD, AIH, PBC, PSC, burned out cirrhosis (e.g. ETOH, HBV)

# Increased Risk of DILI in CLDs?

## Disease-Specific and Non-Specific Susceptibility

### Chronic Viral Hepatitis

- HAART: HCV-HIV
- Anti-TB Rx:
  - HBV
  - HCV ± HIV
  - UGT1A1\*27/\*28

### NAFLD

(OR 3.95; 95% CI 1.4-11.5)

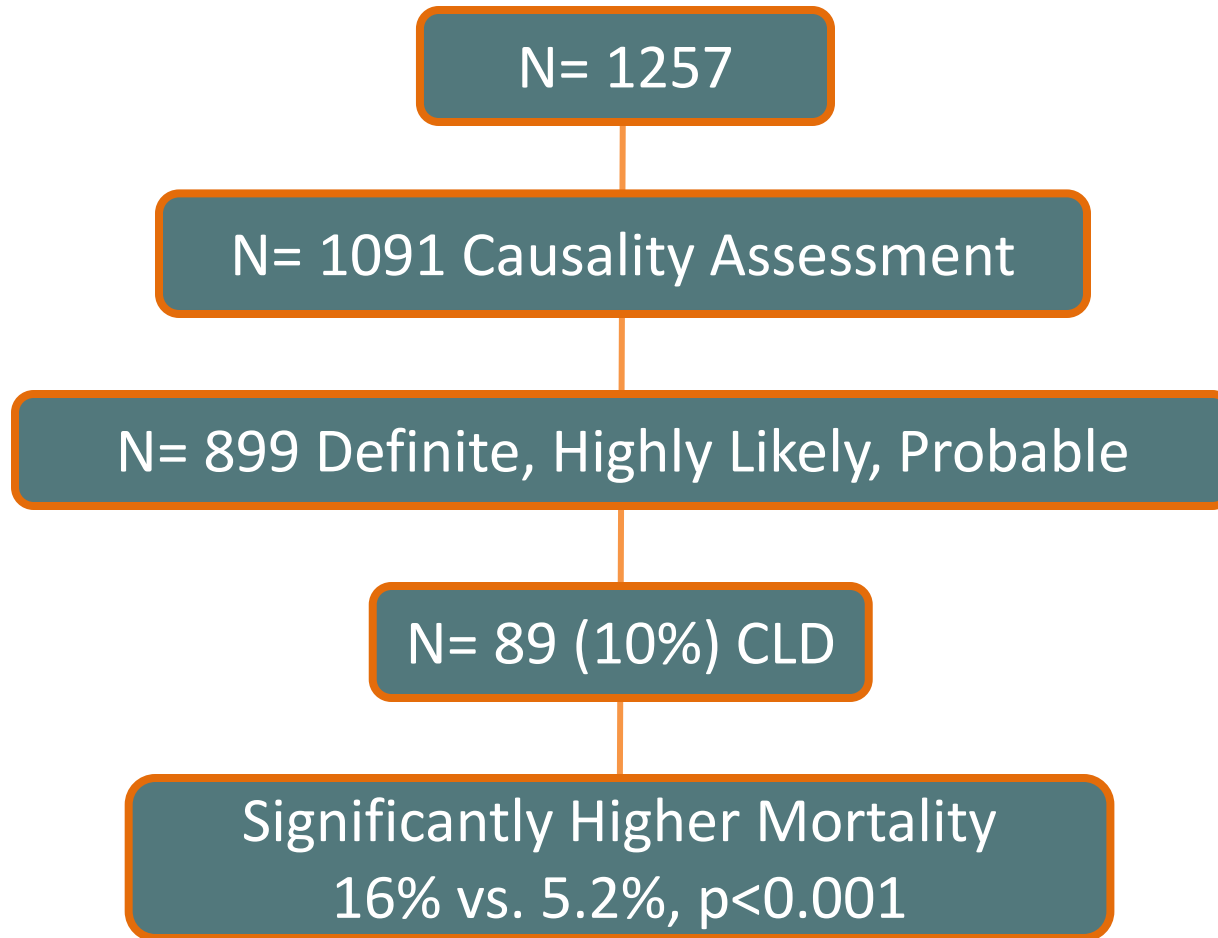
- Antihypertensive
- Anti-Platelet agents
- Antimicrobials
- OTC: NSAIDs, PPI, APAP

### Unspecified CLDs

- Anti-TB Rx:  
UGT1A1\*27/\*28
- Azole Antifungals
- Azithromycin
- Tacrolimus

# Increased Risk of Serious DILI in CLD

## NIDDK DILIN



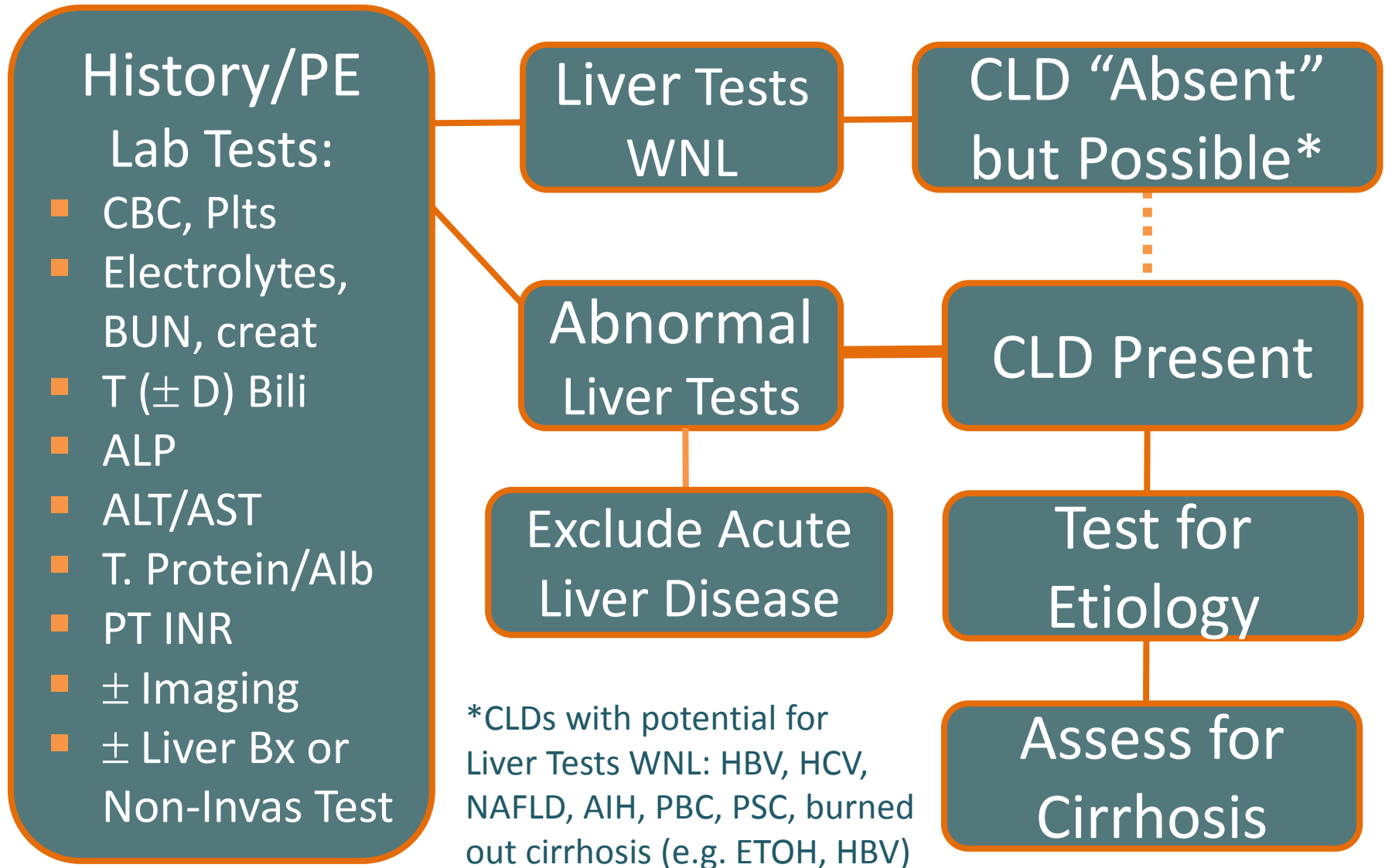
# Can Study Protocols Protect Patients with Liver Diseases from Serious DILI?

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# Identification of Study Subjects with CLDs

## Current Inclusion and Exclusion Criteria



# Identification of Study Subjects with Cirrhosis

## Non-Invasive Detection Methods

Test	Parameters
FibroTest / FibroSure	Bili, GGT, g-globulin, haptoglobin, $\alpha 2$ M, apolipoprotein
FibroSpect	Hyaluronic acid, TIMP-1, $\alpha 2$ M
ELF	HA, Procollagen III amino terminal peptide (PIIINP), TIMP1
HepaScore	Hyaluronic acid, GGT, $\alpha 2$ M
Forns	GGT, cholesterol, platelets, age
APRI	AST /ULN X 100 / platelets ( $10^9$ / L)
SHASTA; (HIV/HCV)	AST, HA, albumin
FIB-4	AST, ALT, platelets, age

Imaging Methods
Transient Elastography: <ul style="list-style-type: none"> <li>■ Fibroscan (FDA-approved)</li> <li>■ Ultrasonic elastography</li> </ul>
Magnetic Resonance Elastography (MRE) FDA-approved No CPT Billing Code

Most accurate differentiating F0-1 from F4 cirrhosis

# Hy's Law

## Derivation and Current Definition

“Drug-induced hepatocellular jaundice is a serious entity. The mortality rate ranges from 10% to 50%.”

Zimmerman, Hyman. Hepatotoxicity; 2<sup>nd</sup> edition, pp 432-3, 1999

### Hy's Law as defined by FDA<sup>1</sup>:

- ALT or AST >3 X ULN (good sensitivity; poor specificity)
- Total bilirubin >2 X ULN (improved specificity)
- No “initial findings of cholestasis (elevated ALP)
- No alternative cause of liver test abnormalities

### NIDDK DILIN<sup>2</sup>:

- ALT >3X ULN
- Total bilirubin >2X ULN
- ALP <2X ULN

### Caveats:

- Not a Law but a clinically useful tool!
- Calls for urgent assessment and adjudication
- 2 Case Rule: Finding 2 Hy's Law cases in a clinical trial is highly predictive of ALF<sup>3</sup>

<sup>1</sup><http://www.fda.gov/downloads/Drugs/.../Guidances/UCM174190.pdf>

<sup>2</sup>Fontana RJ, et al Gastroenterology 2014; 147: 96-52

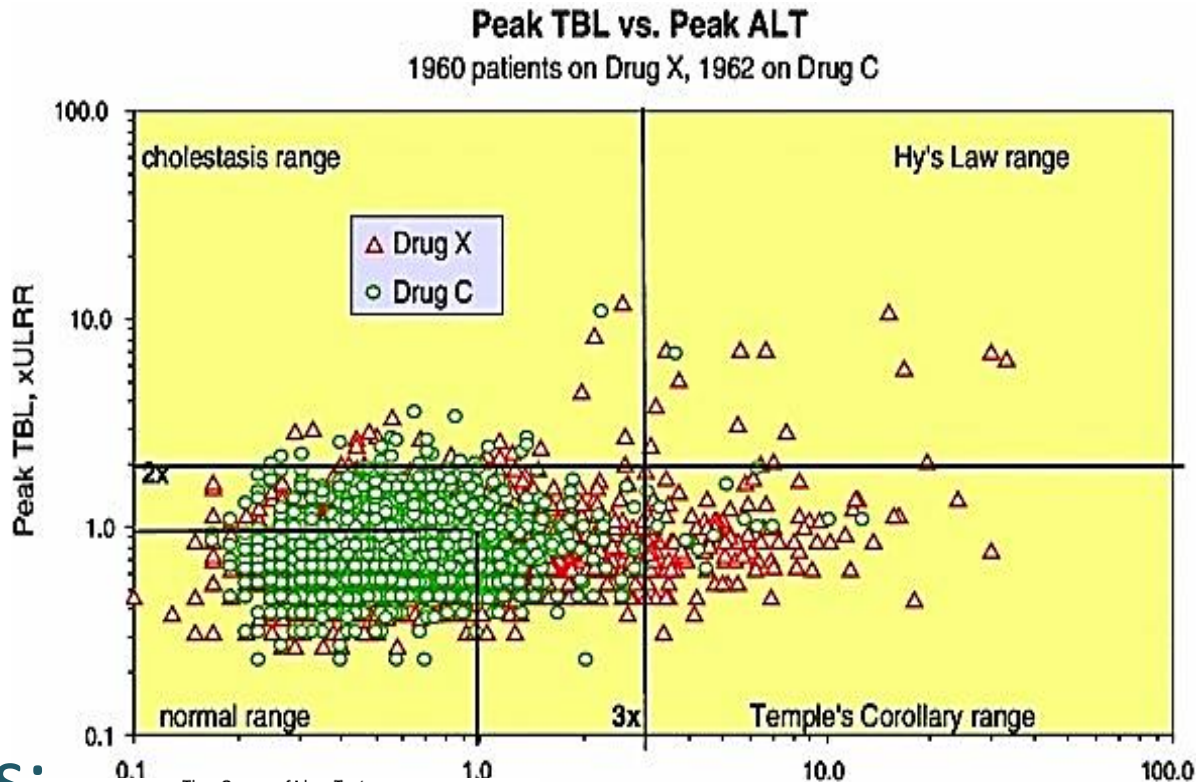
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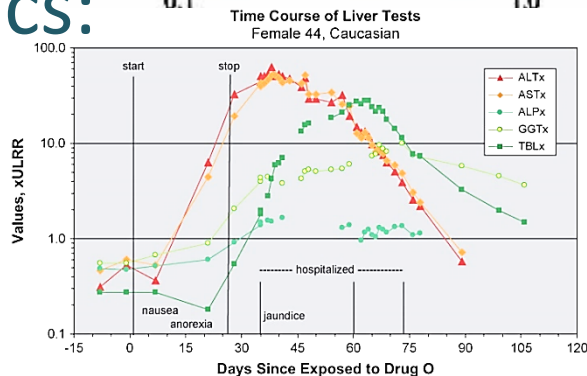
# Identification of DILI in Subjects with CLDs

## Importance of eDISH and Kinetic Analyses

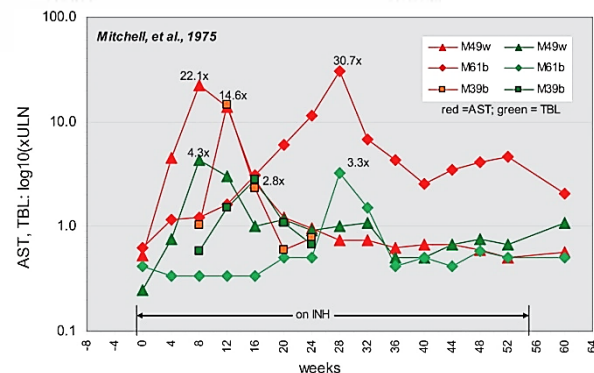
eDISH:



Kinetics:



Peak ALT, xULRR



# Serious DILI in Subjects with or without CLDs

## Stopping Rules for Aminotransferases Alone or in Combination with Elevated Bilirubin or PT INR

Baseline ALT or AST	Stop if post-randomization values are:
Patients with normal ALT or AST	>8X ULN
	>5X ULN in 2 consecutive visits
	>3x ULN & (TBL >2xULN or PT INR >1.5)
	<b>Any of the above</b>
All patients (Regardless of baseline ALT, AST)	>8 ULN
	>5X ULN in 2 consecutive visits
	>3x ULN & (TBL >2xULN or PT INR >1.5)
	<b>Any of the above</b>

TBL, total bilirubin

FDA Guidance for Industry Drug-Induced Liver Injury: Premarketing Clinical Evaluation. 2009.:

<http://www.fda.gov/Biologics/BloodVaccinesGuidanceComplianceRegulatoryInformation/Guidance/default.htm>

# Biochemical Stopping Rules

## Subjects with Decompensated Cirrhosis

Baseline ALT or AST	Stop if post randomization values are:	Patients Meeting Rule (GPB)	Patients Meeting Rule (Placebo)
		<b>N=53</b>	<b>N=51</b>
Patients with normal ALT or AST	>8 ULN	0	1
	>5X ULN in 2 consecutive visits	0	2
	<b>&gt;3xULN &amp; (TBL &gt;2xULN or PT INR &gt;1.5)</b>	7	6
	<b>Any of the above</b>	7	6
		<b>N=90</b>	<b>N=88</b>
All patients (Regardless of baseline ALT, AST)	>8 ULN	4	1
	>5X ULN in 2 consecutive visits	5	3
	<b>&gt;3xULN &amp; (TBL &gt;2xULN or PT INR &gt;1.5)</b>	18	13
	<b>Any of the above</b>	<b>21</b>	<b>14</b>

TBL, total bilirubin

Jurek M, et al. Pharm Med 2016 Epub 11 Jan 2016

Rockey DC, et al. Hepatology 2014; 59: 1073-83

FDA Guidance for Industry Drug-Induced Liver Injury: Premarketing Clinical Evaluation. 2009.:

<http://www.fda.gov/Biologics/BloodVaccinesGuidanceComplianceRegulatoryInformation/Guidance/default.htm>

# Confounding Variation of Liver Biochemical Results in Decompensated Cirrhosis

## Baseline Biochemical Tests:

Biochemical Test	Normal (%)	Abnormal (%)
ALT	58	42
AST	29	71
T Bili	33	67
PT INR	38	62

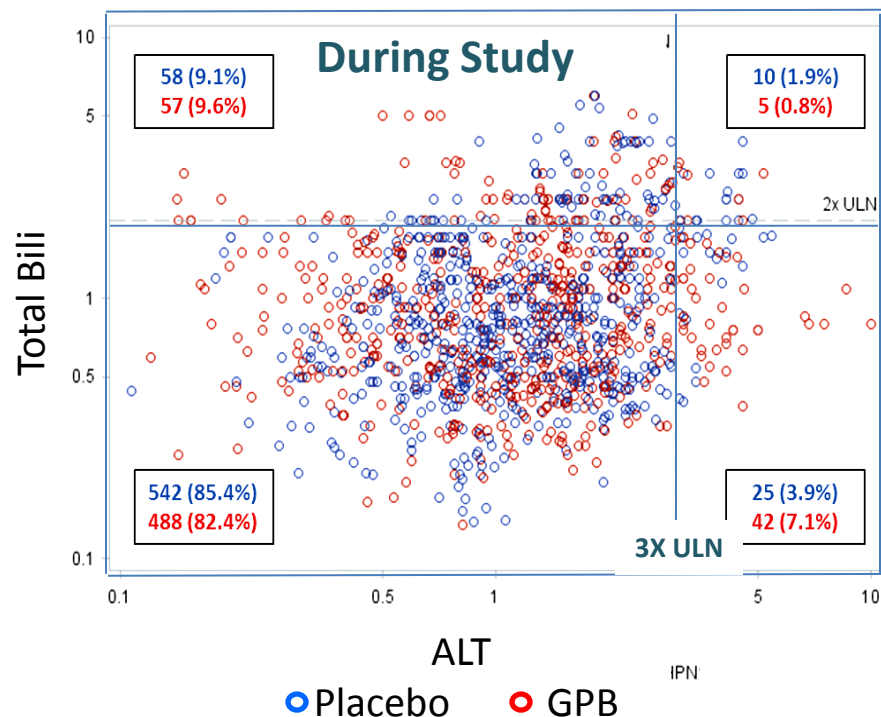
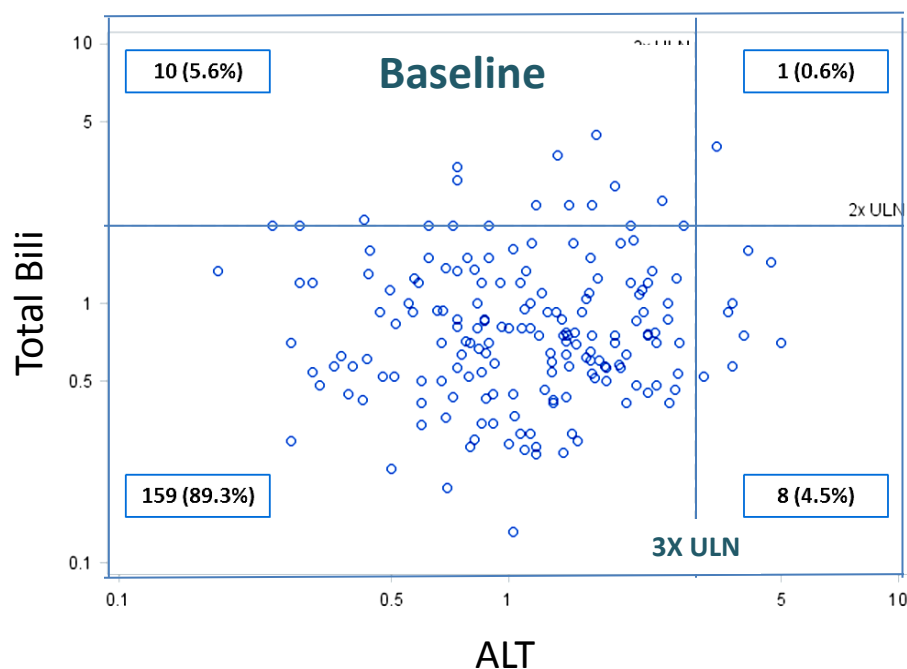
## Baseline MELD (SD):

- Range: 5-26
- Mean: PL, 12.3 (3.8);GPB, 12.3 (3.7)

## Baseline CTP Class (%):

- A (37); B (46); C (16)

## eDISH Plots:



# Serious DILI in Subjects with or without CLDs

## Grading of Liver Enzymes and Total Bilirubin

Adverse Event	Grade 1	Grade 2	Grade 3	Grade 4
<b>ALT</b>	>ULN-3xULN	>3-5X ULN	>5X-20X ULN	>20X ULN
<b>AST</b>	>ULN-3xULN	>3-5X ULN	>5X-20X ULN	>20X ULN
<b>Alkaline Phosphatase (ALP)</b>	>ULN-2.5x ULN	>2.5-5X ULN	>5X-20X ULN	>20X ULN
<b>Total Bilirubin</b>	>ULN-1.5x ULN	>2.5-3X ULN	>3-10X ULN	>10X ULN

# Variability of “Stopping Rules” in Current CLD Trials

Disease	Sponsor	F4?	Evaluation and Stopping Rules
HCV	Abbvie DAAs	Yes	Post-baseline ALT >5X ULN AND >2X baseline: comprehensive evaluation <b>DC: ALT ≥20 X ULN w/o alternative etiology; Increasing Direct bili or PT INR</b>
	Gilead DAAs	Yes	ALT and/or AST > ULN and >5X Day 1 or Nadir; <b>ALT &gt;15X ULN; Hy’s Law</b>
	Merck DAAs	Yes	<b>ALT or AST &gt;500 IU/L; ALT or AST &gt;3X baseline (&gt;110 IU/L) + T bili &gt;2X ULN; and/or PT INR &gt;1.5 X baseline; ALT or AST &gt;3X nadir (&gt;100 IU/L) with new eosinophilia (.5%); Onset of moderate/severe TEAEs, including N/V, RUQ pain or tenderness</b>
PBC	Intercept OCA	Yes	<b>ALT and/or AST &gt;3X ULN and 2X baseline OR 2 consecutive tests of T bili &gt;ULN and &gt;2X baseline in absence of biliary obstruction</b>
	NGM FGF19	Yes	ALT and T bili >2X baseline; ALT >2X baseline may be observed with repeat PT INR
PSC	Intercept OCA	Yes	<b>ALT and/or AST &gt;3X ULN and 2X baseline OR 2 consecutive tests of T bili &gt;ULN and &gt;2X baseline in absence of biliary obstruction</b>
	NGM FGF19	Yes	<b>ALT and T bili &gt;2X baseline; ALT &gt;2X baseline may be observed with repeat PT INR</b>
	Gilead Simtuzumab	Yes	2X baseline ALP, ALT, AST, ggt, T bili with level TEAE grade 3
NASH	BMS PEG-FGF21	No	<b>ALT 2x baseline and &gt;5X ULN + either T bili &gt;2x ULN or PT INR &gt;2;</b>
	Immuron Anti-LPS	No	TEAEs grade 3 if related; DC for grade 4
	Gilead Simtuzumab	No	ALT or AST >2X baseline→repeat H&P, labs; ALT >3X ULN or T bili→repeat H&P, labs; <b>Hy’s Law and/or PT INR &gt;1.5;</b>
	Intercept OCA	No	<b>ALT or AST &gt;8X ULN; ALT or AST &gt;5X ULN for &gt;2 weeks; ALT or AST &gt;3X ULN with new onset fatigue, N/V, RUQ pain/tenderness, fever, rash and/or eosinophilia (&gt;5%); Hy’s Law</b>
	Genfit PPARα/δ	No	<b>Normal Baseline ALT/AST: &lt;3X ULN, monitor; &gt;3X-&lt;5X ULN, monitor; &gt;5X ULN D/C; Abnormal Baseline ALT/AST: &lt;3X, monitor; &gt;3X baseline &amp; &lt;10X ULN, closer monitoring; &gt;5X baseline or &gt;10 X ULN, D/C; Hy’s Law; ALT or AST &gt;3X baseline or ULN + PT INR &gt;1.5</b>

# Assessment of DILI Severity

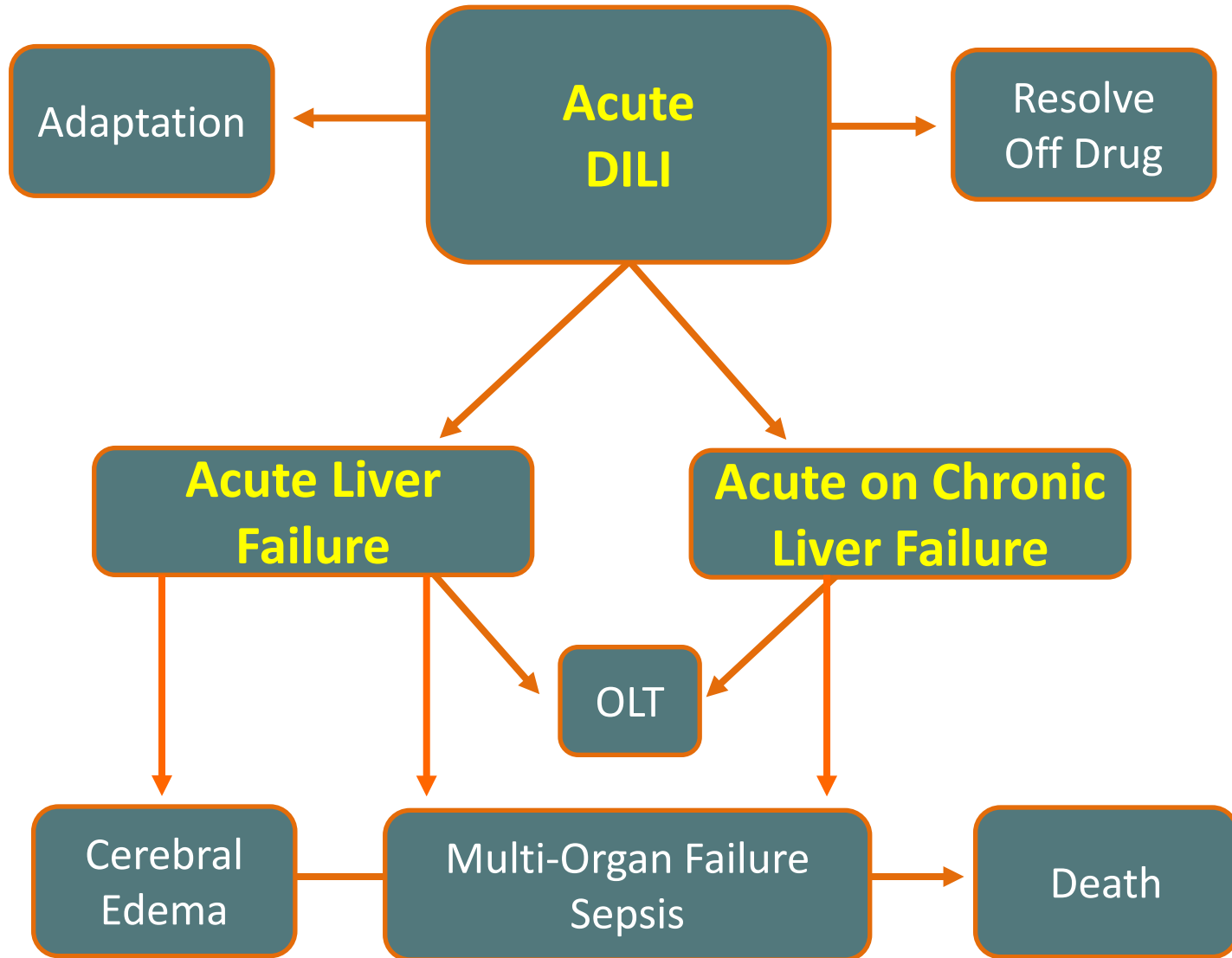
## DILIN Severity Index Score

Stage	Description	Criteria
1	Mild	↑ ALT/AST or ALP; T Bili <2.5; INR <1.5
2	Moderate	↑ ALT/AST or ALP; T Bili >2.5 or INR ≥1.5
3	Moderate Hospitalized*	↑ ALT/AST or ALP; T Bili >2.5 or INR ≥1.5 and hospitalized or admission prolonged
4	Severe*	↑ ALT/AST or ALP; T Bili ≥2.5 and 1 of following: decompensation (INR ≥1.5, ascites, HE) or other organ failure associated with DILI event
5	Fatal*	Death or OLT due to DILI

\*SAE in Clinical Trials

# DILI Severity and Outcome

## Acute Liver Failure vs. Acute on Chronic Liver Failure





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  - a. Assessment pre-enrollment
  - b. Monitoring on treatment
  - c. Functional assessments
  - d. Stopping rules

# Identification of Study Subjects with CLDs

Expand Testing to Enhance Exclusion or Inclusion

History/PE

Lab Tests:

- CBC, Plts, retics
- Electrolytes, BUN, creat
- T and D Bili
- ALP/ggt
- ALT/AST/CPK
- T. Protein/Alb
- PT INR
- UGT1A1, OATP, BSEP
- Imaging
- Non-Invasive Testing for Stg 3-4
- QLFTs for Stg 3-4
- ± Liver Bx

Liver Tests  
WNL

CLD "Absent" but  
↑ing Probability\*

Specific  
Liver Disease

CLD  
Present

Abnormal  
Liver Tests

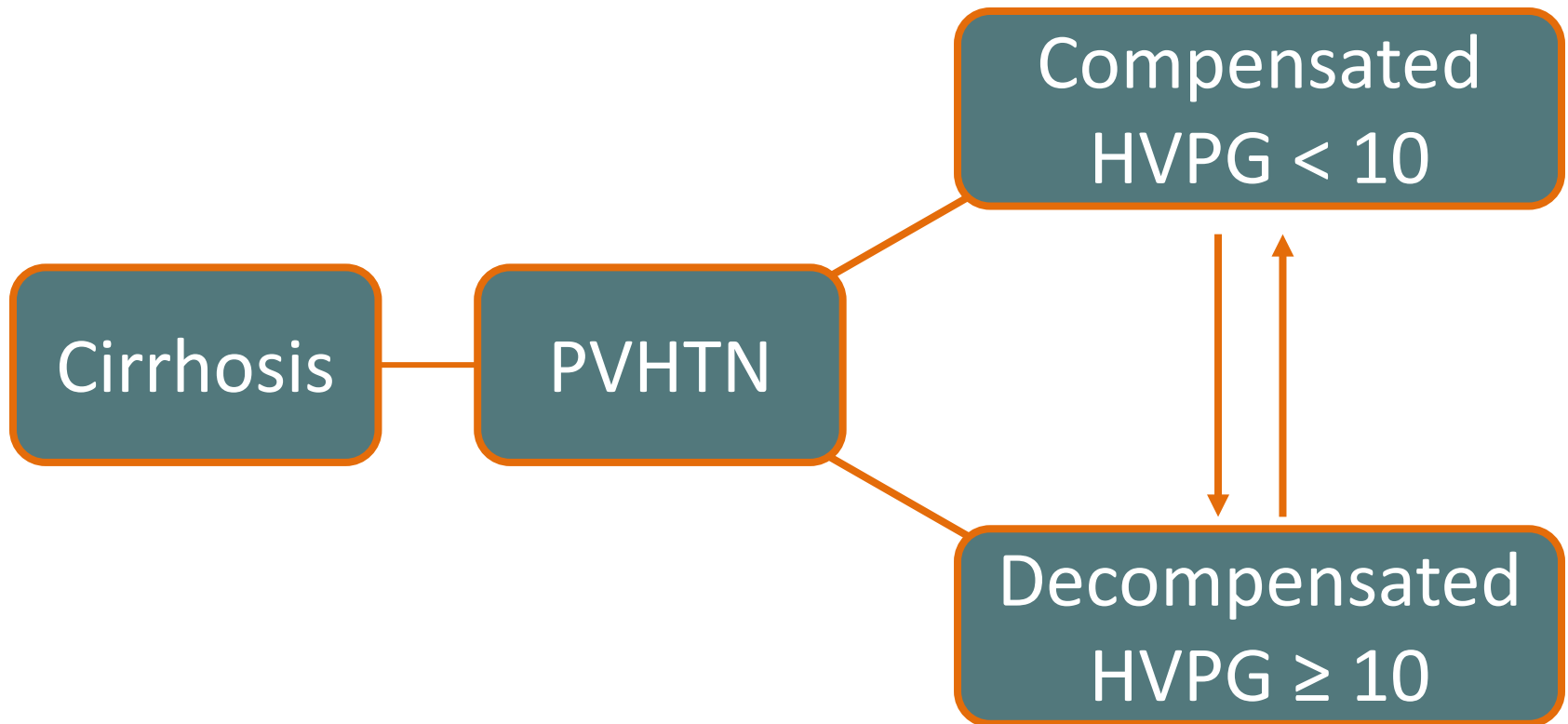
Test for  
Etiology

Non-Invasive  
Testing for  
Cirrhosis

\*NB! Additional testing required to exclude: HBV, HCV, NAFLD, AIH, PBC, PSC, burned out cirrhosis (e.g. ETOH, HBV, AIH), EBV, CMV, SOS, Wilson disease

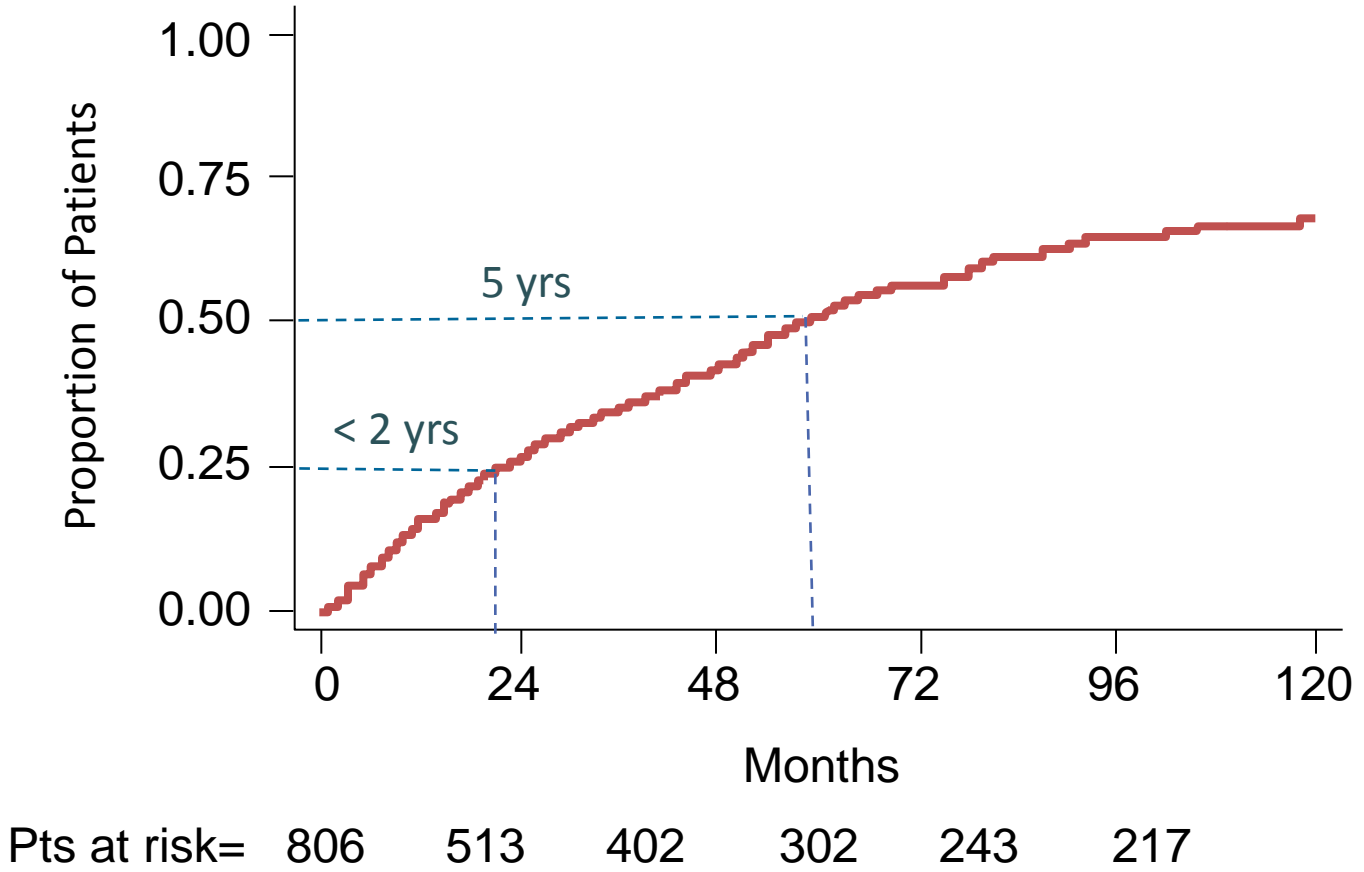
# Risk of Decompensation of Cirrhosis

## Gold Standard Fasting HVPG $\geq 10$ mm Hg



Hepatic Venous Pressure Gradient (HVPG) = Wedged HV Pressure – Free HV Pressure

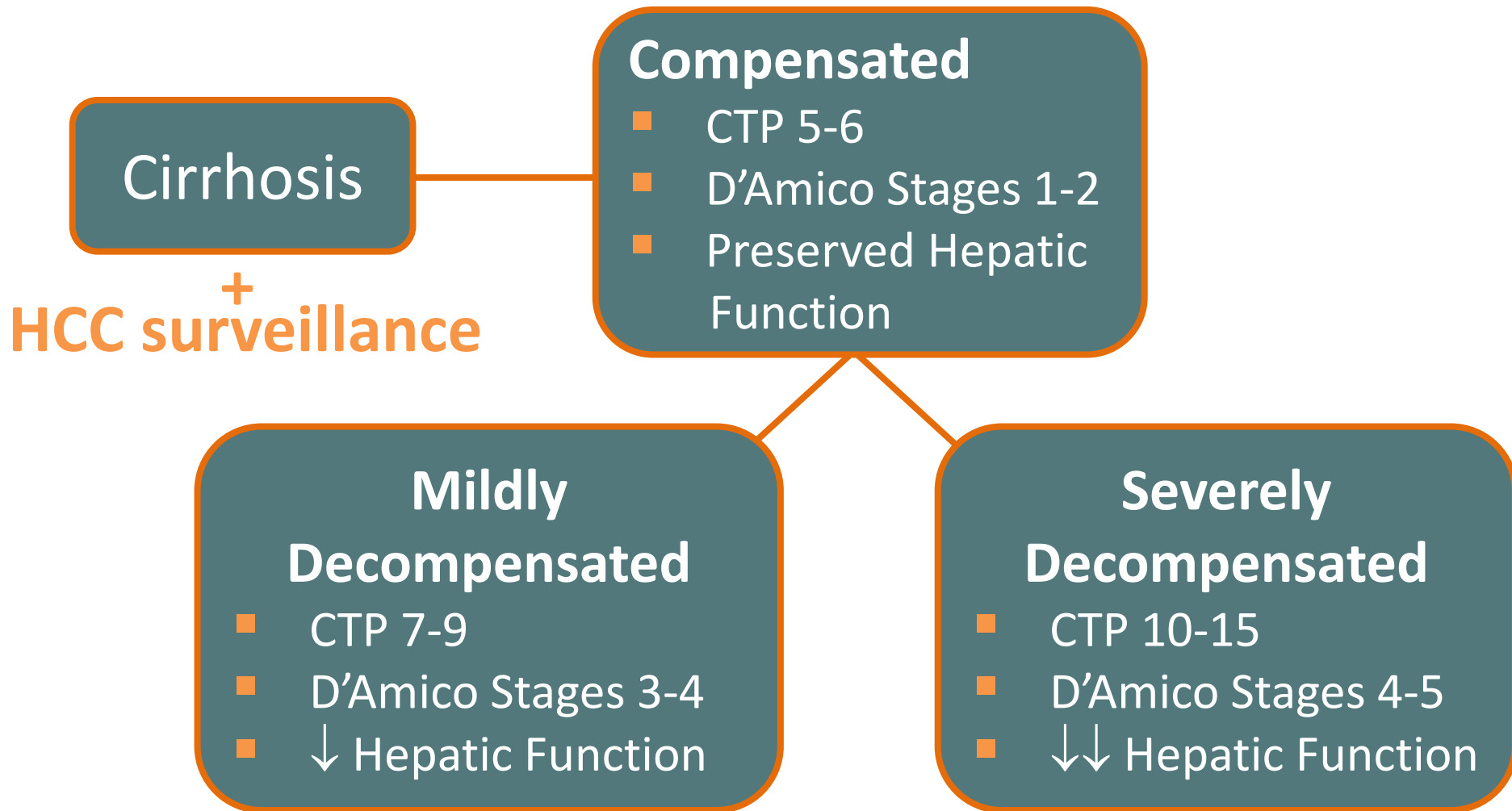
# Cumulative Proportion of Patients Transitioning from Compensated to Decompensated Cirrhosis



D'Amico G et al. J Hepatol. 2006.

# Classification of Study Subjects with Cirrhosis

## Surrogate Measures of Hepatic Functional Reserve



# Quantitative Liver Function Testing

## Non-Disease Specific Assessments of Function

### HEPATIQ

- FDA approved
- $^{99m}\text{Tc}$ -Liver-Spleen Scan
- Software analysis calculates Perfused Hepatic Mass (PHM)

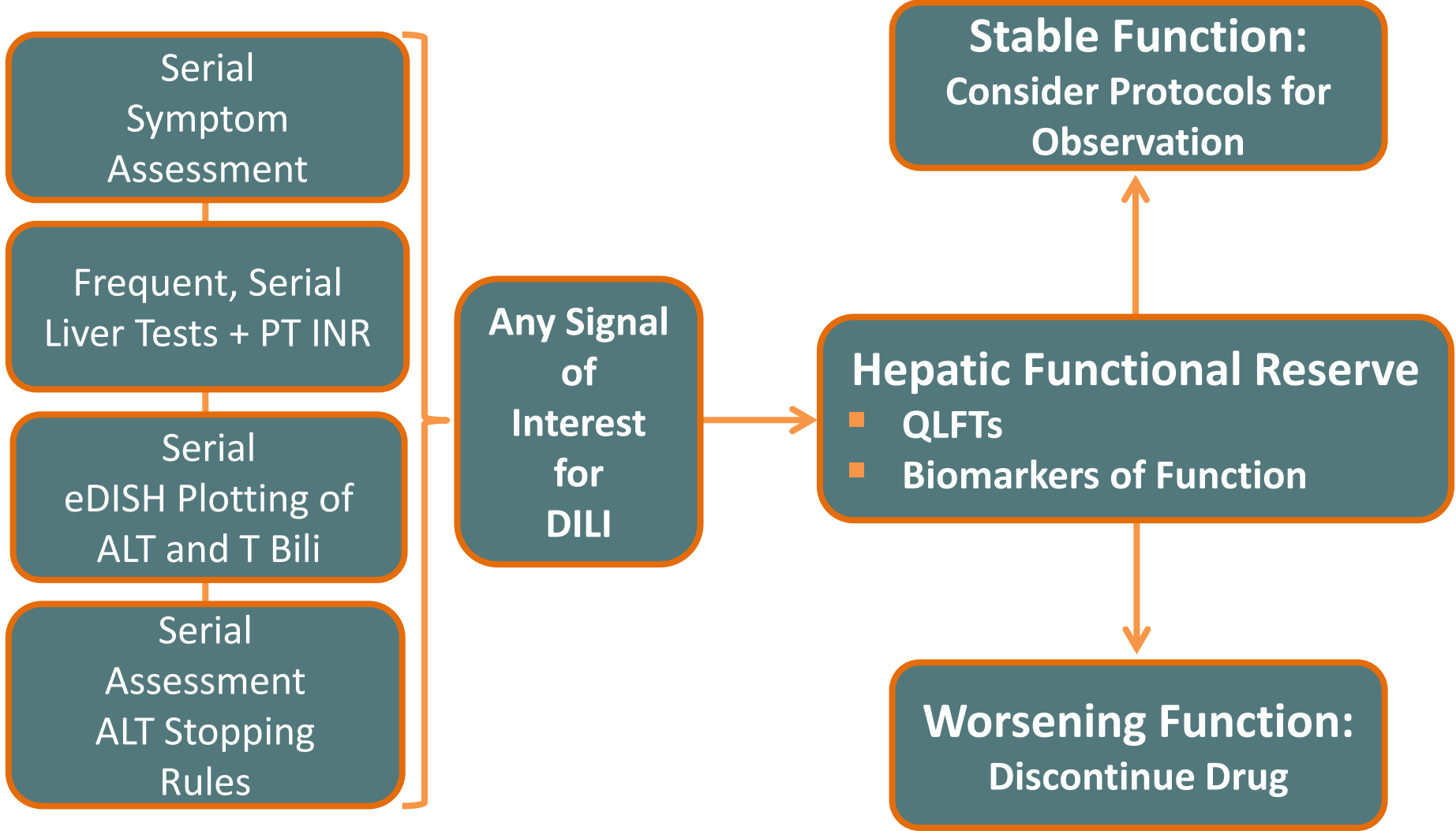
### HepQuant

- Not FDA approved
- Analyses of oral and/or iv cholate clearance
- Calculation of Disease Severity Index (DSI) or STAT score

### Excalenz

- Not FDA approved
- $^{13}\text{C}$ -Methacetin breath test of  $^{13}\text{C}$ -M to APAP
- Generates PK/PD of  $^{13}\text{CO}_2$

# Stopping Rules Using Functional Monitoring for Severe DILI in CLD with or without Cirrhosis



# Concern About DILI in CLD with or without Cirrhosis: A Call to Clinical Action

Serial  
Symptom  
Assessment

Frequent, Serial  
Liver Tests + PT INR

Serial  
eDISH Plotting of  
ALT and T Bili  
and Kinetics

Serial  
Assessment  
ALT Stopping  
Rules

Any Signal  
of  
Interest  
for  
DILI

## Urgent Need for:

1. Repeat history and PE
2. Repeat testing to verify
3. Comprehensive testing for etiologies other than DILI
4. Calculate MELD/Na, CTP
5. Repeat QLFTs to detect change in hepatic function
6. More frequent F/U visits, liver tests and QLFTs
7. Adherence to stopping rules



# Future Investigative Opportunities in DILI

## Host Factors and Drug Properties

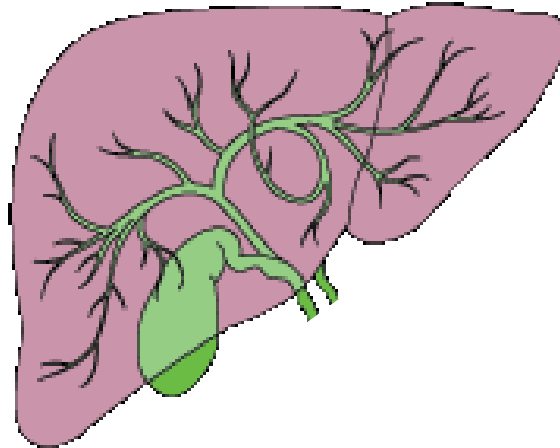
Hepatic  
Function  
Testing

Epidemiology  
of  
CLDs in Trials

Biomarkers

- DILI
- DILI Severity

Genetics  
Polymorphisms  
Proteomics  
Metabolomics



Microbiome  
Drug  
Metabolism

DILI  
Pathogenetic  
Mechanism(s)

Host-Drug  
Transporters  
Metabolism

PK/PD for  
Hepatic Dosing

- Stages 0-3
- Cirrhosis

# Summary

- Enrollment of patients with CLDs, with and without cirrhosis, in trials of drug development is increasing due to the rising prevalence of CLDs and cirrhosis:
  - general drug development
  - disease-specific therapies for all major classes of CLDs
  - cirrhosis (antifibrotics) and complications of PVHTN and HCC
- In general, CLDs do not increase susceptibility for DILI, but exceptions exist, and more are likely to be discovered.
- Subjects with CLDs and low hepatic functional reserves have increased risks of serious DILI and death.
- Currently, study protocols provide protection for subjects with CLD from serious DILI by alerting investigators to the need for urgent, comprehensive evaluation of cases meeting Hy's Law or other criteria and/or exhibiting evidence of decompensated cirrhosis.
- Future study protocols should provide additional protection for subjects with CLD by direct quantitative testing of hepatic functional reserve at baseline and during any suspected DILI event, applying biomarkers of DILI and its severity, testing for polymorphisms of UGT1A1, OATP and BSEP to aid in interpretation of abnormal bilirubin and cholestasis and utilizing advanced imaging techniques with the goal of producing better evidence-based stopping rules for patients with CLDs.