

*Improving the Design  
Of Early Phase  
Stem Cell Clinical Trials*

***James L. Sherley, M.D., Ph.D.***

***Director***



***Boston, MA USA***

Conflict of Interest  
Disclosure Statement

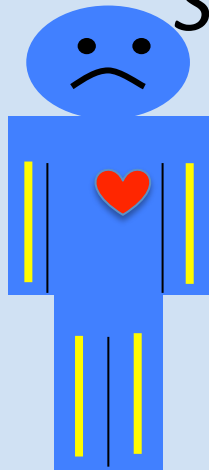
*Asymmetrex, LLC  
is a for-profit company  
engaged in commercial development  
related to ideas presented.*

# Topics Addressed

- Discussion of the design features that currently limit the success of stem cell clinical trials
- The importance of quality sourcing and characterization of stem cell treatment preparations by suppliers
- Tension between FDA-authorized clinical trials and treatment evaluations in private stem cell clinics

# Stem Cell Clinical Trial Developments

## *The Established Stem Cell Treatment Paradigm*



### **SC DEFICIENCY**

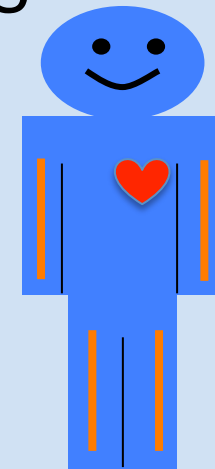
Inherited  
Injury  
Iatrogenic

***Hematopoietic Stem Cells***



### **TISSUE STEM CELLS**

Homologous  
Postnatal  
Natural  
Mobilized  
Autologous  
Allogeneic (Transport)  
Perinatal (Cord Blood)  
Uncultured

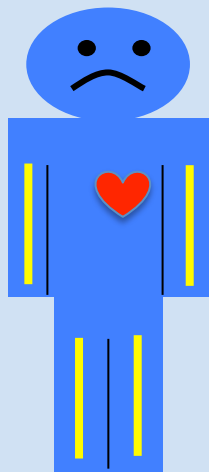


### **TREATMENT**

Replacement  
Durable  
FDA-approved

# Stem Cell Clinical Trial Developments

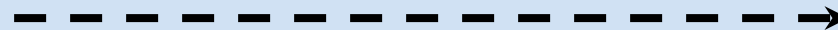
Clinical Investigation  $\xrightarrow{\text{time}}$  FDA INDs



## SC DEFICIENCY

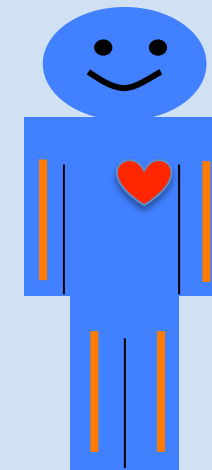
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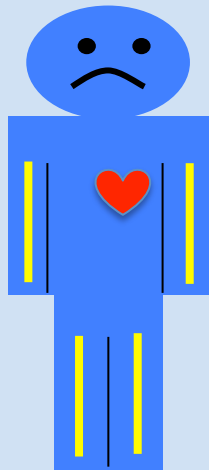
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# Stem Cell Clinical Trial Developments

100s of FDA-authorized Clinical Trials

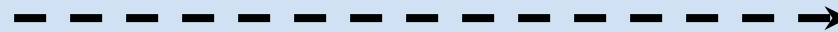
Well-powered, Prospective, Double-blind,  
Randomized, Placebo-Controlled,  
Multicenter



## SC DEFICIENCY

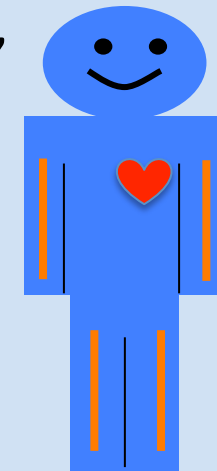
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***Hematopoietic Stem Cells***



## TISSUE STEM CELLS

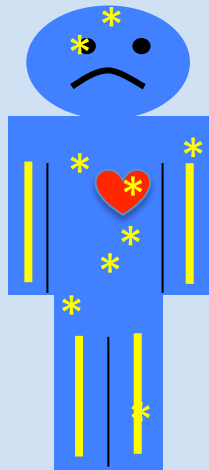
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## TREATMENT

Replacement  
Durable  
FDA-approved

# A New Stem Cell Clinical Trial Frontier



## AILMENTS

Inherited  
Injury  
Iatrogenic  
Cancer  
Degenerations  
Aging

## STEM CELLS

Homologous

*Non-homologous*

Postnatal (*Multiple*)

Perinatal (*Multiple*)

Natural

*Engineered (Gene Therapies)*

Mobilized

Autologous

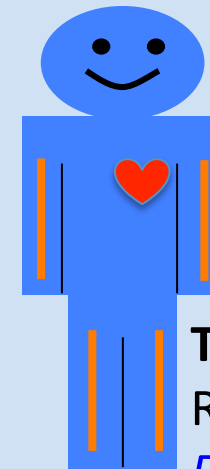
Allogeneic (*Transport*)

*[Embryonic]*

*[Induced Pluripotent]*

Uncultured

*Expanded, Manufactured*



## TREATMENT

Replacement

*Rejuvenation*

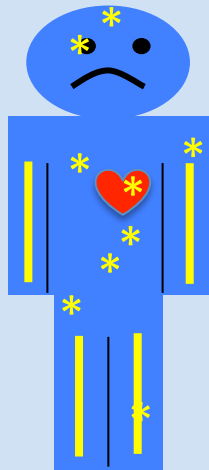
*Repair*

Durable

*[Transient]*

**UNPROVEN**

# A New Stem Cell Clinical Trial Frontier



## AILMENTS

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Injury  
Iatrogenic  
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Aging

## TISSUE STEM CELLS

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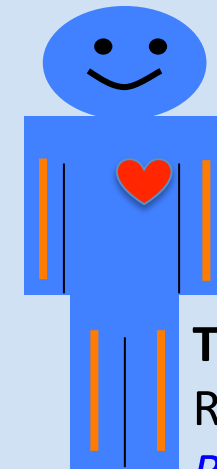
Uncultured

*Expanded, Manufactured*

**HSCs – homologous replacement**

**– non-homologous rejuvenation**

**MSCs – non-homologous rejuvenation**



## TREATMENT

Replacement

*Rejuvenation*

*Repair*

Durable

*[Transient]*

**UNPROVEN**



Discussion of the design features  
that currently limit the success of  
stem cell clinical trials

Discussion of *the major unacknowledged design feature* that currently limits the success of **ALL stem cell clinical trials**

# Stem Cell Clinical Trial Design Goals

1. Relevant to the question evaluated
2. Feasible (e.g., supply)
3. Practical
4. Well-powered
5. Safe
6. Ethical
7. Manageable
8. Affordable
9. Yield interpretable findings

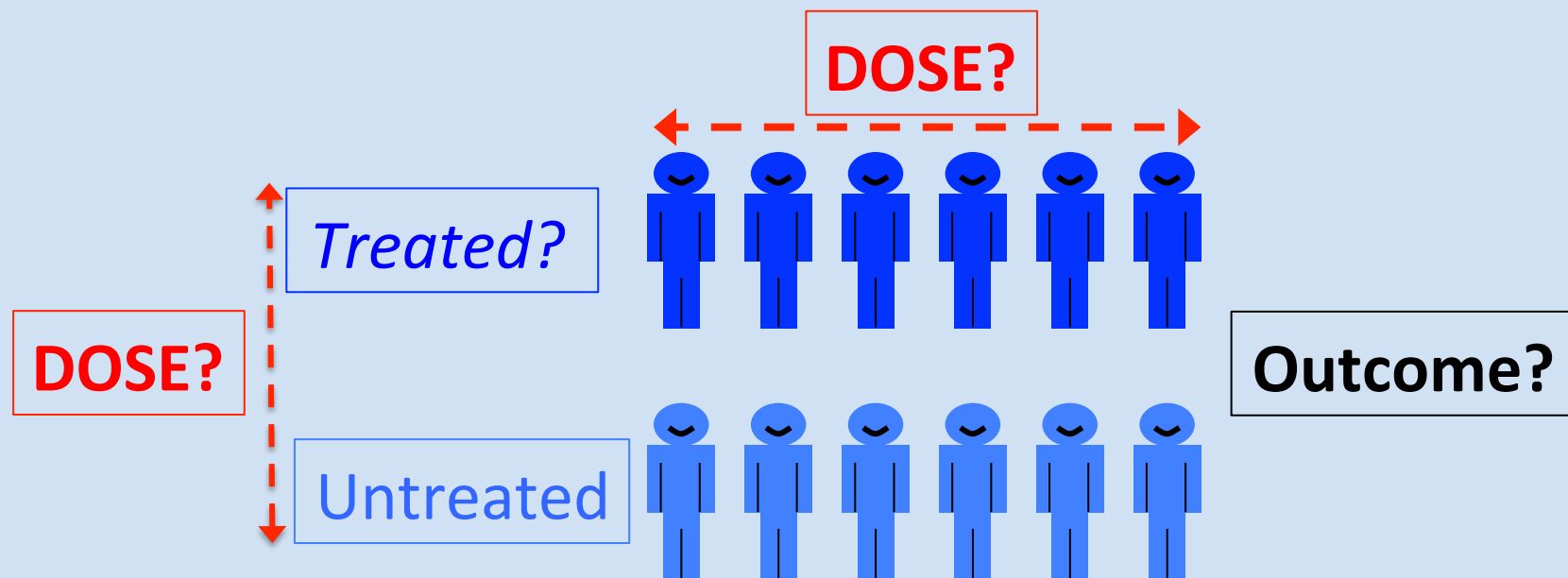
# The major limiting design feature?

1. Relevant to the question evaluated
2. Feasible (e.g., supply)
3. Practical
4. Well-powered
5. Safe
6. Ethical
7. Manageable
8. Affordable
- 9. *Yield interpretable findings***

# Stem Cell-Specific Dose

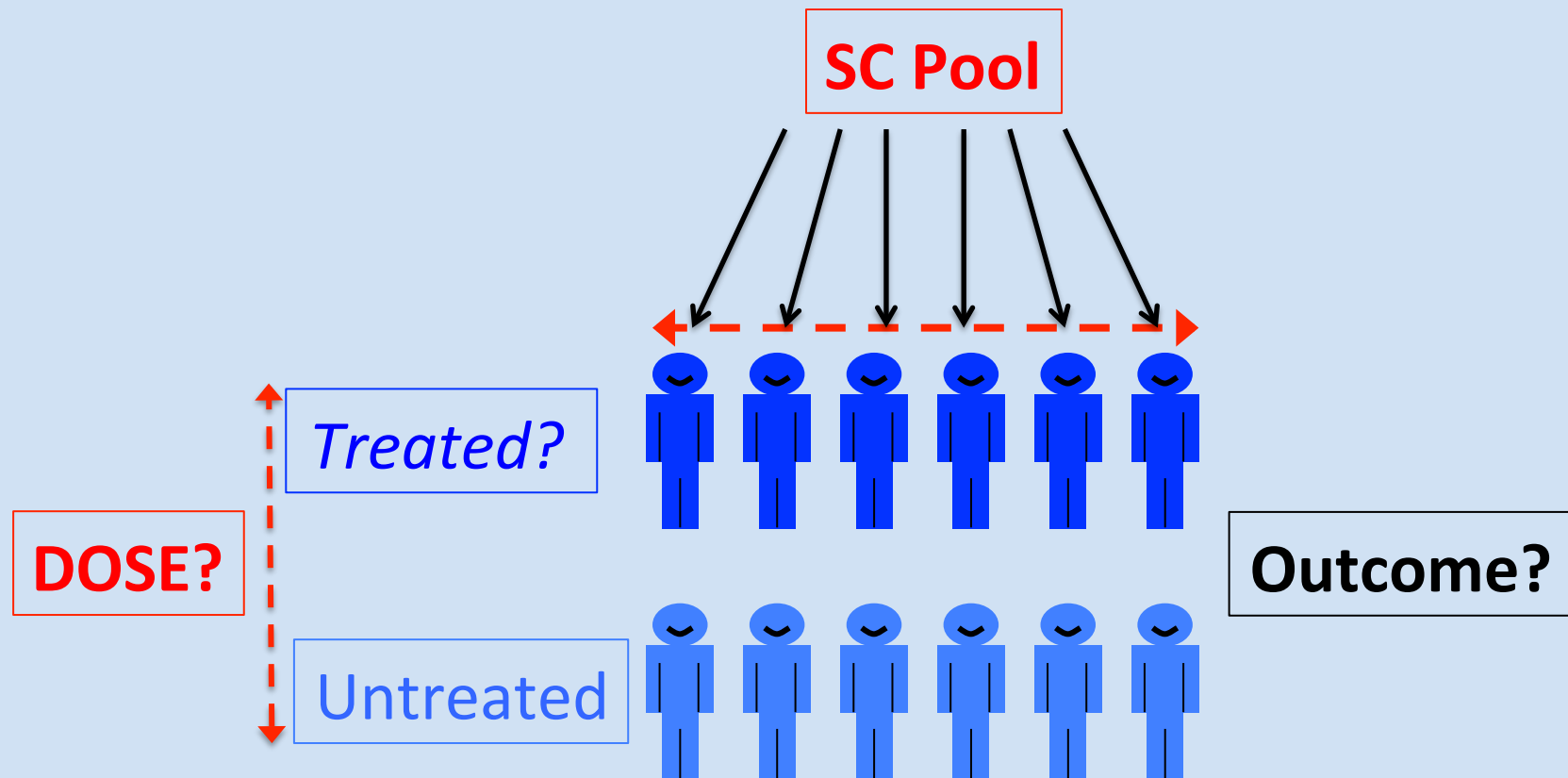
*The major limiting design feature*

- largely unacknowledged or unrecognized
- previously, no technology available\*



# Stem Cell-Specific Dose

*The major limiting design feature*



# Stem Cell-Specific Dose

*The major limiting design feature*

Interpret?!

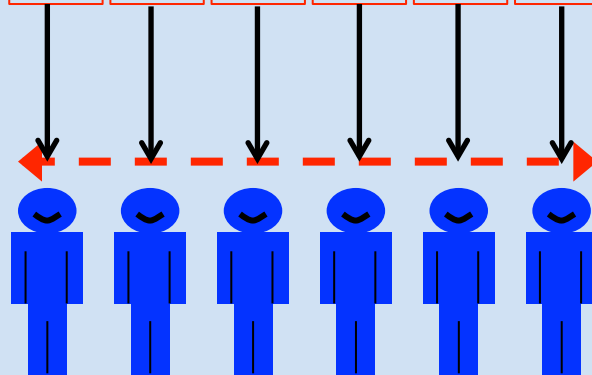
v. patients

v. arms

v. trials

**Unknown Varying Doses**

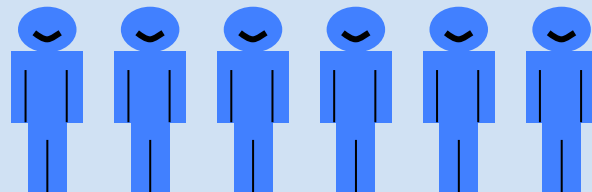
38 55 12 10 99 10



**DOSE?**

Treated?

Untreated



Outcome?


# In ALL Trials And Treatments Stem Cell-Specific Dose Is Unknown

- I. Approved therapies and trials designed to improve  
*e.g.*, HSCT (cord blood, bone marrow, mobilized)
- II. Cell replacement transplant trials  
*e.g.*, pancreas, liver, cornea
- III. Non-homologous transplant tissue repair trials  
*e.g.*, MSC and HSC transplants for stroke, heart attack
- IV. Gene therapy trials
- V. Gene-editing therapeutics trials
- VI. Treatments in private stem cell clinics






# 2019 FDA Standards Coordinating Body (SCB) Recognizes the Need

STANDARDS DEVELOPMENT FOR REGENERATIVE MEDICINE THERAPIES Standards Needs - Clinical Trials

 **Clinical Trials**







## C20 CLINICAL TRIAL INTERPRETATION WITH UNKNOWN STEM CELL-SPECIFIC DOSES

 Cell Therapy  Gene Therapy  Tissue Engineering

Stem cell dose is a measure of the viable stem cells present in a given treatment, which can vary within a trial and across trials for different therapies.

**CHALLENGE:** The mechanisms for stem cell activity are complex and poorly understood, and stem cell counts may vary over time, which makes it difficult to count stem cells and establish standard, effective doses and routes of administration (ROA) in clinical trials. This leads to inconsistent trial results that are hard to interpret and replicate and may not be sufficiently reliable to progress to the next phase of clinical trials.

**FUNCTIONAL AREAS**


-  Bioprocessing and Production Standards
-  Analytical and Testing Methodologies Standards
-  Product Quality and Characterization Standards
-  Logistics and Compliance Criteria Standards
-  Preclinical Study Standards
-  Clinical Trial Standards


### POTENTIAL FOR STANDARDIZATION

<b>STANDARD OBJECTIVE</b>	Broaden <b>understanding of stem cell activity and variation over time</b> to establish guidelines to identify reliable mechanisms for administering safe, efficacious doses.
<b>POSSIBLE AREAS TO STANDARDIZE</b>	<ul style="list-style-type: none"> <li>• Stem cell counting methods/technologies</li> <li>• Qualifying ROAs</li> <li>• Optimal timing for dose assessment</li> <li>• Dose preparation methods</li> </ul>

**RELATED EFFORTS**

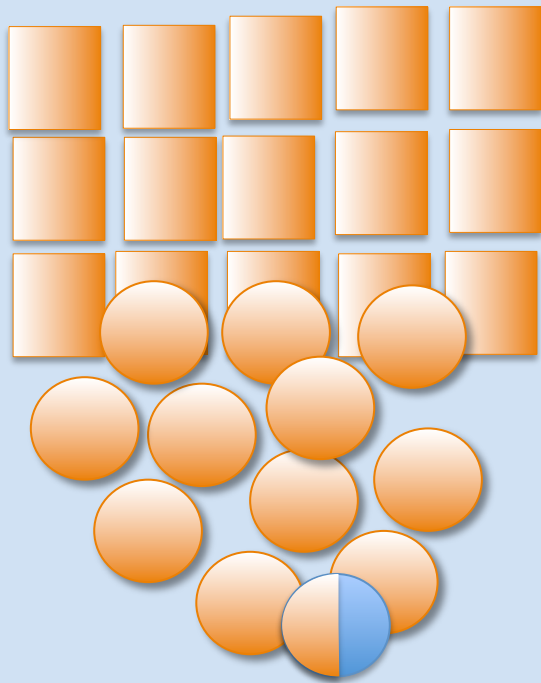
- Efforts around cell counting (including an [SCB standard advancement project](#)) can ensure accurate counts are measured when comparing doses across trials.
- USP has standards on [CD34+ stem cell counting methods](#).



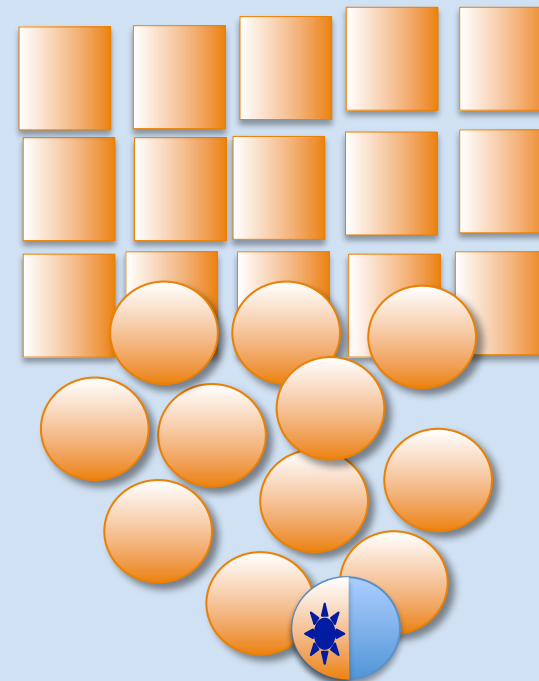
**NEXT STEPS** 

- Conduct comparative ROA and dosage studies.
- Assess common causes of inconsistent doses.

# Previously, adult tissue stem cell counting has been unavailable because...

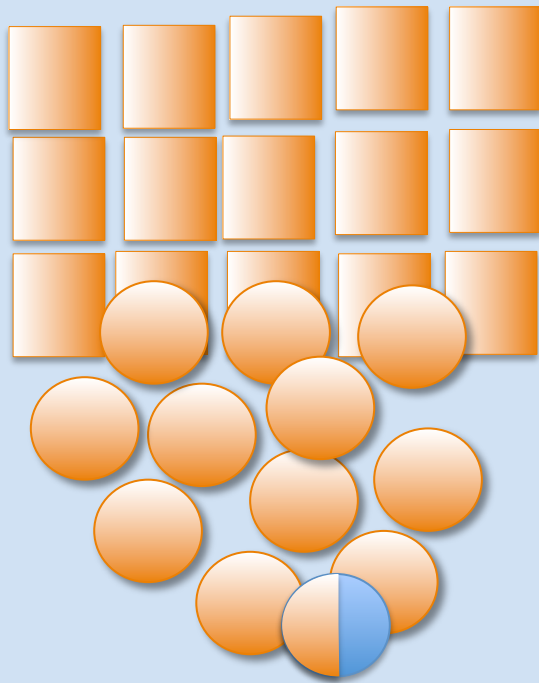


1. *Adult tissue stem cells are a small fraction of total tissue cells, even after best isolation (< 1% or less).*

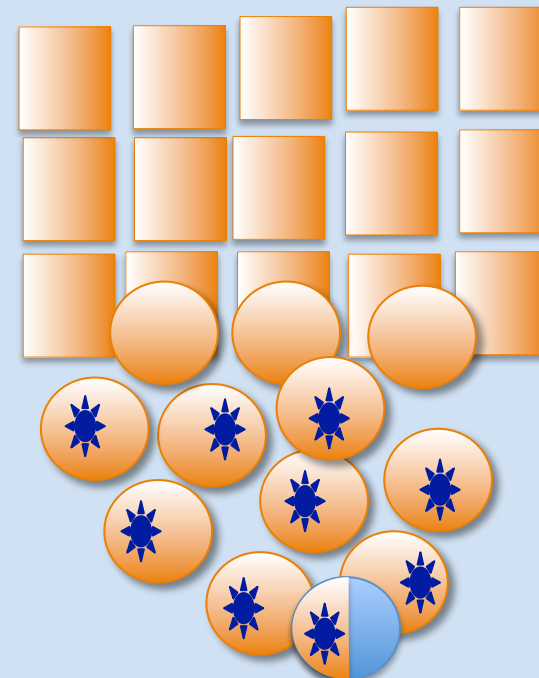


2. *No misnamed “stem cell biomarkers” distinguish adult tissue stem cells from committed progenitor cells.*

# Previously, adult tissue stem cell counting has been unavailable because...



1. *Adult tissue stem cells are a small fraction of total tissue cells, even after best isolation (< 1% or less).*



CD34  
CD133  
CD90

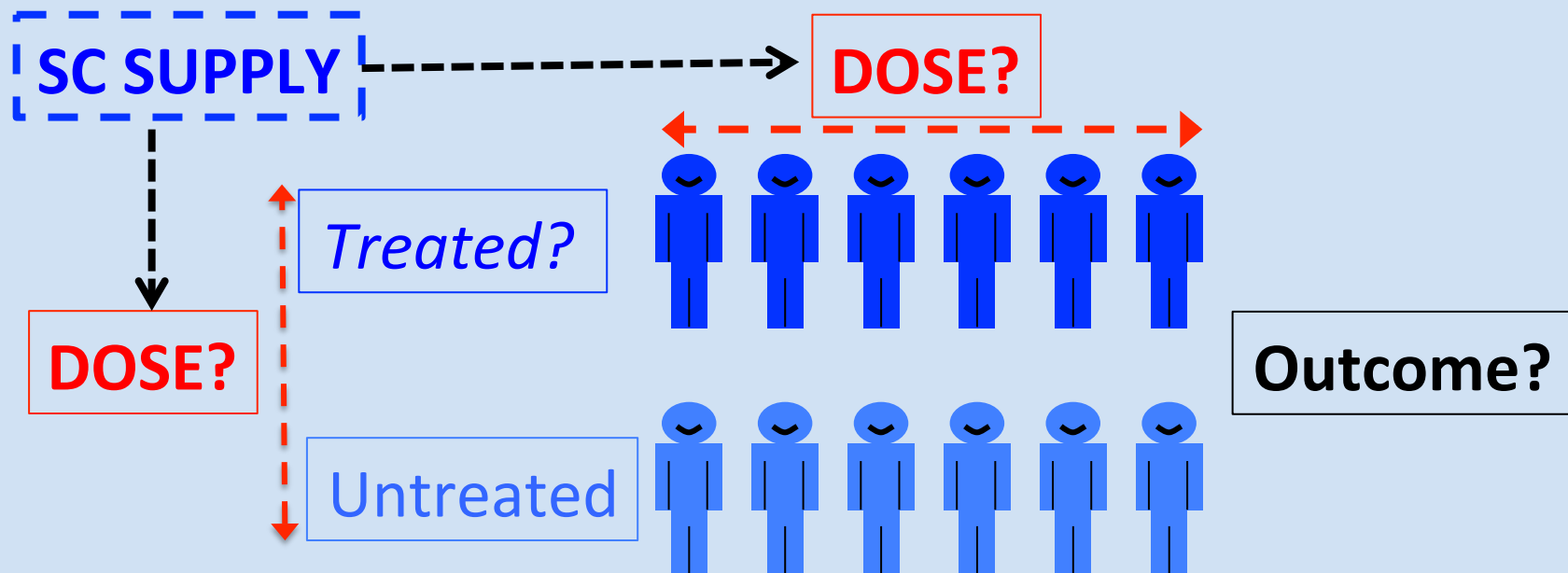
2. *No misnamed “stem cell biomarkers” distinguish adult tissue stem cells from committed progenitor cells.*

The importance of quality sourcing  
and characterization of stem cell  
treatment preparations by suppliers

# Stem Cell-Specific Dose

## *Overlooked factor for quality supply*

- largely unacknowledged or unrecognized
- previously, no technology available\*



# Stem Cell Supply Quality Goals

*Currently Undermined by Need for SC counting*

1. cGMP
2. Sterility
3. Xeno-free
4. Affordable
- 5. Viability – stem cell-specific**
- 6. Potency – dose?**
- 7. Quantity – stem cell-specific**
- 8. Reproducibility – dose?**
- 9. Transport stability – stem cell-specific**

Tension between FDA-authorized  
clinical trials and treatment  
evaluations in private stem cell clinics

# FDA-Authorized Stem Cell Clinical Trials

**HCT/Ps – Human cell and tissue products guidances**

Tissue Stem Cells (HSCs, MSCs, etc.)

**Clinical Trials**

*Conventional approval*

IND

NDA

PMA

100s trials

est. 30,000 patients

**Safety!**

**Efficacy?**



# FDA-Authorized Stem Cell Clinical Trials vs. Private Stem Cell Clinic Treatments

**HCT/Ps – Human cell and tissue products guidances**

Tissue Stem Cells (HSCs, MSCs, etc.)

## **Clinical Trials**

*Conventional approval*

IND

NDA

PMA

100s trials

est. 30,000 patients

**Safety!**

**Efficacy?**

## **Stem Cell Clinics**

*Non-approved*

FDA oversight?

*Recent FDA Scrutiny*

> 500 US clinics

***est. >250,000 patients***

# FDA-Authorized Stem Cell Clinical Trials vs. Private Stem Cell Clinic Treatments

## 2018 HCT/Ps – New Guidances

Tissue Stem Cells (HSCs, MSCs, etc.)

### 351 Guidance

Non-homologous use?

Manipulated?

*Requires IND Approval*

### 361 Guidance

Homologous use?

Minimally manipulated?

*Exempt, BLA register only*

*Biological rationales – illogical, inconsistent, contrived*

*Patient protection goals – health and financial*

# FDA-Authorized Stem Cell Clinical Trials vs. Private Stem Cell Clinic Treatments

**HCT/Ps – Human cell and tissue products guidances**

Tissue Stem Cells (HSCs, MSCs, etc.)

**Clinical Trials**

**Safety!**

**Stem Cell Clinics**

*Conventional approval*

**Efficacy?**

*Non-approved*

*Both improve for patients and stem cell medical progress when tissue stem cell-specific counting and dosing are finally implemented.*