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Guideline on clinical investigation of medicinal products in the treatment of schizophrenia

7 Draft

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- This guideline replaces NfG on clinical investigation of medicinal products in the treatment of
- schizophrenia (CPMP/EWP/559/95).

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Comments should be provided using this <u>template</u>. The completed comments form should be sent to <u>cnswpsecretariat@ema.europa.eu</u>

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Keywords	Schizophrenia, cognitive deficit in schizophrenia, negative symptoms in
	schizophrenia, partial response, treatment resistant schizophrenia, short term
	treatment, maintenance treatment



Guideline on clinical investigation of medicinal products in

the treatment of schizophrenia

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Executive summary

- 59 This document is intended to provide general guidance for the development of medicinal products for
- 60 the treatment of schizophrenia. The guideline has been developed during a transitional period in which
- 61 the DSM IV classification and diagnostic criteria for schizophrenia (and other psychotic conditions) are
- being revised in the preparation for the DSM 5.
- 63 This guideline will not address development of medicinal products for the treatment of psychotic
- 64 conditions other than schizophrenia.
- 65 The main requirements for medicinal products developed for the treatment of schizophrenia, with
- 66 regard to study design, patient population and outcome measures are described. Specific issues,
- 67 including treatment resistant patient population and other specific patient groups (children and
- 68 adolescents) are addressed. Attention is focused on alternative treatment options such as add-on and
- 69 augmentation therapy. The importance of specific domains in schizophrenia including cognition and
- 70 negative symptoms are discussed as well.
- 71 The change in outcomes of clinical studies performed in patients with schizophrenia in the last decades
- 72 (e.g. higher placebo response, stability of clinical response) has triggered a broad discussion. Possible
- 73 study design in terms of use of placebo, study duration, and patient population have been reviewed
- and have been redefined. The main scope is to provide guidance on the choice of clinical studies which
- 75 are feasible and likely to produce interpretable results, without exposing unnecessarily patients to
- 76 substances with unknown effect.
- 77 This document should be read in conjunction with other relevant EMA and ICH guidelines (see section
- 78 3).

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1. Introduction (background)

1.1. Schizophrenia

- 81 Schizophrenia is a severe psychiatric disease with a heterogeneous course and symptom profile. The
- 82 personal tragedy associated with schizophrenia is extreme, since it attacks the human properties
- 83 considered most precious and distinguishing. The worldwide lifetime morbidity risk of the disorder is
- 84 about 1 percent across diverse geographic, cultural, and socio-economic regions. The age of onset of
- 85 the first psychotic episode is typically in the late teens, but can be as late as into the mid thirties.
- 86 Onset prior to adolescence is rare. Age of onset is earlier in men than in women. In most patients the
- 87 disease follows a chronic course with long lasting impairment.
- 88 Schizophrenia presents clinically with so-called positive and negative symptoms. The positive
- 89 symptoms include delusions, hallucinations, disorganised speech, and disorganised or catatonic
- 90 behaviours. Negative symptoms include affective flattening, restriction in the fluency and productivity
- 91 of thought and speech and in the initiation of goal- directed behaviour. The positive symptoms appear
- 92 to reflect an excess or distortion of normal functions, whereas negative symptoms appear to reflect a
- 93 diminution or loss of normal function.
- 94 In addition, cognitive deficits (defects of working memory, information processing, attention/vigilance,
- 95 learning, reasoning and social cognition) are common. Whether these should be considered to belong
- 96 to the core symptoms is currently under discussion. Cognitive deficits generally show poor
- 97 improvement with current antipsychotic treatments.
- 98 Besides these predominant symptoms, schizophrenia is associated with an increased incidence of other
- 99 psychiatric symptoms such as manic and depressive symptoms, anxiety or obsessive-compulsive

- 100 symptoms, substance abuse and dependence, and personality disorder. Schizophrenia with co-morbid
- symptoms should be distinguished from other psychotic disorders (see also section 1.3).
- 102 The current diagnostic criteria are made explicit in the Diagnostic and Statistical Manual of Mental
- 103 Disorders (4th edition) (DSM IV) and in the International Classification of Diseases, (ICD 10). These
- 104 criteria are valid for the purpose of case identification. According to DSM IV (1994) the essential
- 105 features of schizophrenia are a mixture of characteristic signs and symptoms (both positive and
- negative) that have been present for a significant proportion of time during a 1 month period, with
- some signs of the disorder persisting for at least 6 months.

1.2. Schizophrenia in the paediatric population

- 109 Schizophrenia is very rare in pre-pubertal children and is more likely to be associated with
- 110 chromosomal/cytogenetic variations. However, if recognized the disease is comparable at the symptom
- 111 level to that in adults.

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- 112 Fleeting hallucinations and delusions are common in paediatric subjects and therefore a high rate of
- 113 misdiagnoses is reported. The differential diagnosis includes affective disorders (major depressive
- episodes and bipolar disorder), psychosis due to medical conditions, side effects of medication and/or
- substance abuse, pervasive developmental disorders, conduct disorders, post-traumatic disorders and
- personality disorders under development.
- 117 It may, therefore, often be more realistic to diagnose only the first episode of psychosis in children
- which, in a small proportion of cases, might finally develop into early onset schizophrenia.
- 119 Schizophrenia in adolescents may be preceded by prodromal cognitive impairment at young age but
- 120 these abnormalities have neither diagnostic specificity nor predictive value. With increasing age,
- 121 symptoms increasingly resemble those of adults. However, negative and cognitive symptoms (such as
- 122 flat or inappropriate affect) are more prominent from the beginning. In addition the disease follows a
- more severe course, has lower response to treatment and a worse long-term prognosis.
- Because of these characteristics in children and adolescents, for registration purposes, only patients
- with a definitive diagnosis of schizophrenia would be eligible for inclusion in clinical studies.

126 1.3. Other psychotic disorders

- 127 Several other psychotic conditions are recognised. However, their classification and diagnostic criteria
- 128 are being thoroughly revised within the preparation of DSM 5. The diagnosis and treatment of
- 129 psychotic conditions other than schizophrenia will not be discussed in the current guideline (see also
- 130 section 2).

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1.4. Treatment

1.4.1. Medicinal treatment

- 133 The aim of antipsychotic treatment can be categorised into: 1) acute treatment to predominantly
- 134 reduce positive symptoms, and 2) maintenance of effect to consolidate control of symptoms and to
- prevent exacerbations. In addition to the traditional emphasis on positive symptoms, a number of
- 136 clinical trial programmes have investigated products specifically for their possible effects on negative
- symptoms, cognitive function, and on depressive symptoms seen in schizophrenia.
- 138 The effectiveness of the first generation, so-called typical antipsychotic agents, on symptoms in
- schizophrenia is mostly attributed to their anti-dopaminergic effect, particularly at the D2 receptors.

- 140 The second generation or so-called atypical antipsychotic agents show in addition a varying degree of
- affinity for serotoninergic (notably 5-HT 2A), dopaminergic, muscarinic, cholinergic, a1 adrenergic and
- 142 histamine H1 receptors, which are thought to be involved largely in the negative symptom
- 143 presentation.
- 144 Recently compounds that reduce glutamate receptor activity are being studied in line with theories that
- dysregulation of the glutamatergic system might contribute to the pathophysiology of schizophrenia.
- Also drugs acting on the GABA (γ-Aminobutyric acid) system, on alpha-2 adrenergic receptors and on
- 147 various serotoninergic and dopaminergic receptors including D1 receptor agonists as well as
- 148 acetylcholinesterase inhibitors and muscarinic acetylcholine receptor agonists are being studied for
- their impact on either cognition or other symptoms not directly linked to the positive symptoms.
- 150 For patients whose psychotic symptoms are not sufficiently controlled with one medicinal product there
- are a number of possible augmentation strategies with various treatment objectives. Although such
- strategies are quite widely used in clinical practice there are no products currently approved in the EU
- 153 (European Union) for use in this way at the time of writing of this document, and there is a general
- 154 lack of supporting evidence.

1.4.2. Supportive treatment

- 156 In most EU countries, patients with schizophrenia are offered supportive treatment, such as
- 157 standardised psychotherapy, psycho-education, social support, and counselling. These supportive
- 158 treatment practices vary considerably among EU member states but have their value for sustainability
- of drug effects.

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2. Scope

- 161 This guideline focuses primarily on antipsychotic products developed specifically for schizophrenia.
- 162 Some comments are also made about treatment of psychosis as a part of other disorders. However,
- data requirements to support an indication for other disorders are out of the scope of this guideline.
- During the development of this guideline DSM IV is under revision, and it is expected that it will be
- replaced by DSM 5. This might have consequences for the definitions of the disorders as given in this
- guideline, and these may need amending likewise.

3. Legal basis

- This guideline has to be read in conjunction with the introduction and general principles (4) and part of
- the Annex I to Directive 2001/83 (as amended) and relevant CHMP and ICH guidelines, among them:
- Dose-Response Information to Support Drug Registration (CPMP/ICH/378/95 , ICH E4)
- Pharmacokinetic studies in man (EudraLex vol. 3C C3A).
 - Note for guidance on clinical investigation of drug interactions (EMEA/CPMP/EWP/560/95)
- The Clinical Evaluation of QT/QTs Interval Prolongation and Proarrhythmic Potential for Non-Antiarrhythmic drugs (CHMP/ICH/2/04, ICHE14)
- Guideline On The Non-Clinical Investigation Of The Dependence Potential Of Medicinal Products
 (EMEA/CHMP/SWP/94227/2004)
- Statistical Principles for Clinical Trials (CPMP/ICH/363/96, ICH E9)
- Choice of Control Group in Clinical Trials (CPMP/ICH/364/96, ICH E10)
- Adjustment for Baseline covariate (CPMP/EWP/2863/99)

- Missing data (CPMP/EWP/177/99 Rev 1)
- Extent of Population Exposure to Assess Clinical Safety (CPMP/ICH/375/95, ICH E1)
- Reflection paper on the extrapolation of results from clinical studies conducted outside the EU to the EU population (EMEA/CHMP/EWP/692702/2008)
- Note For Guidance On Clinical Investigation Of Medicinal Products In The Paediatric Population
 (CPMP/ICH/2711/99, ICH E11)
- Studies in support of special populations: geriatrics (CPMP/ICH/379/99, ICH E7)
- Guideline on the exposure to medicinal products during pregnancy: need for post-authorisation data (EMEA/CHMP/313666/2005)

4. Specific considerations when developing products for the treatment of schizophrenia

- 191 In developing medicinal products for the treatment of schizophrenia, specific issues should be
- 192 considered. These include:

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193 **4.1. General strategy**

4.1.1. Use of placebo

- 195 There is a debate about the use of placebo in clinical trials in the treatment of schizophrenia. Concerns
- 196 about ethical issues and feasibility have been raised. However, assay sensitivity cannot be guaranteed
- even in well designed and conducted trials if a placebo arm is not included. Historical controls (efficacy
- 198 of the older antipsychotics) are not useful for current clinical trials, since the concept of the disorder,
- 199 the diagnostic criteria and the efficacy criteria have changed. In recent trials in schizophrenia, the
- 200 difference in efficacy between active treatments and placebo has tended to be smaller than the
- 201 difference seen in the past. Therefore, a placebo control has been considered necessary for internal
- validation of non-inferiority trials comparing new drugs to an active control and is highly desirable so
- that the 'absolute' effects (both therapeutic and adverse) of a product can be ascertained.
- To avoid unnecessary risks for patients and others, placebo controlled studies should be performed in a
- 205 highly controlled setting, with stringent follow-up to apply the predefined escape criteria, rescue
- 206 medication and stopping rules. Provided these safeguards are in place, both short term and long term
- 207 placebo controlled trials are not considered unethical, as long as patients in the placebo group receive
- 208 the entire standard care except the antipsychotic medication.

4.1.2. Specific claims

- 210 For classical antipsychotics an effect on schizophrenia should be demonstrated before efficacy on
- 211 specific domains (such as cognition or negative symptoms) can be claimed. This is to avoid
- 212 unnecessary polytherapy. For other compounds with another mechanism of action that target a
- 213 specific domain, specific claims could be made. Each of these claims should be supported by robust
- 214 evidence and this will normally require trials specifically designed to test the specific aspect of efficacy
- for which a claim is to be made. The patient population studied, the comparator that is chosen, and the
- usefulness (validity, relevance) of the rating scales used to measure efficacy for that situation should
- all be justified (see section 4.5).

4.1.3. Extrapolation to other psychoses

- As stated in sections 1.3. and 2, psychotic symptoms may occur in other disorders which may either be
- 220 syndromes distinct from schizophrenia or prodromal to the development of full schizophrenia.
- 221 Diagnostic criteria can be found in DSM IV and ICD 10. As such disorders may differ substantially in
- 222 terms of patient characteristics and their natural course, it is not possible to extrapolate data from a
- 223 specific psychotic disorder (e.g. schizophrenia) to another (e.g. delusional disorder). Therefore, it is
- not acceptable to perform studies in order to support a broad indication for treatment of psychosis.

4.2. Assessment of therapeutic efficacy

- 226 To support an indication for the treatment of schizophrenia, efficacy on main symptoms has to be
- 227 demonstrated in short-term studies and maintenance of effect has to be shown in at least one long
- term study. Both types of data should be part of the package submitted for marketing authorisation.
- 229 It should then be acknowledged that symptoms, e.g. depressive symptoms, maybe partly or entirely
- 230 secondary to schizophrenia, may represent pre-existing signs and symptoms, or be the result of
- 231 treatment. When trying to determine whether a product affects these symptoms in a positive or
- 232 negative way, efforts should be made to distinguish between a genuine specific effect and a
- 233 'secondary' effect.

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- 234 Likewise, cognitive deficits may be at least in part secondary to causes such as psychotic symptoms,
- 235 be side effects of medicinal products (especially anti-cholinergic agents), depression or under-
- stimulation of the patient (as a result of hospitalisation). The effect of treatment on cognitive function
- should be documented even if no specific indication is claimed, for purposes of safety data collection.

238 4.2.1. Choice of efficacy outcomes and assessment tools

- 239 Efficacy has to be measured with the use of widely accepted, reliable and validated measurement
- scales. In some cases alternative assessment tools may be appropriate, but the choice of other tools
- should be fully justified based on standard test quality criteria.
- 242 The primary efficacy measure should be a composite measure of the symptoms of schizophrenia. For
- 243 this, the widely accepted tools to measure are the PANSS (Positive and Negative Symptom Scale) and
- 244 BPRS (Brief Psychiatric Rating Scale), which are still considered as reliable and validated.
- In addition secondary efficacy measures should be presented to assess the effect of the test product on
- further aspects of the disease. Clinical global impression (CGI) data should also be presented.
- 247 For assessment of negative symptoms in particular, the use of specially designed rating scales is
- 248 necessary. Older assessment scales such as the BPRS give little emphasis on negative symptoms and
- are not suitable for this purpose. Satisfactory reliability and validity has been demonstrated for the
- 250 negative symptoms subscale of the PANSS and for SANS (Scale for the Assessment of Negative
- 251 Symptoms). Global assessment of negative symptoms (CGI) should be added. Due to the limitations of
- all available scales, the development of new scales is encouraged. Validated instruments should also be
- used to assess treatment effects on cognition and depression.

4.3. Clinical Pharmacology studies

4.3.1. Pharmacodynamics

- 256 The use of potential biomarkers such as receptor occupancy PET studies (e.g. D2 and 5HT 2A) and
- 257 imaging techniques to detect structural changes in the brain may be useful in dose finding and proof of

- 258 concept studies in early drug development. However, specific claims will be obtained based on results
- from clinical outcomes and not on biomarkers, so the latter could provide only supportive evidence.

260 4.3.2. Pharmacokinetics

- No specific requirements for medicinal products in schizophrenia are necessary (see Guideline on
- 262 Pharmacokinetic studies in man). The extent to which the drug crosses the blood-brain barrier should
- 263 be established.

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4.3.3. Interactions

- 265 All pharmacodynamic interactions between the test drug and any other drug that may be prescribed
- 266 simultaneously in clinical practice should be studied, as well as potential pharmacodynamic interactions
- 267 with alcohol and CNS (Central Nervous System) active illicit substances. If relevant, pharmacokinetic
- 268 studies in patients with hepatic and /or renal impairment should be performed. Reference is made to
- 269 the drug interaction guideline.

4.4. Clinical efficacy trials

4.4.1. Exploratory trials

- 272 For exploratory or proof of concept studies a wide range of designs are acceptable. In these studies the
- 273 emphasis tends to be maximization of the power of the study to detect a treatment effect. Methods of
- achieving this include using narrow inclusion criteria or other selection of patients considered most
- 275 likely to respond, and excluding placebo responders (enrichment design). These design aspects are
- 276 only acceptable for exploratory trials, and should not be applied to provide confirmatory pivotal
- 277 evidence of efficacy.

4.4.2. Demonstration of dose response relationship

- 279 It is essential that the proposed doses for the SmPC are robustly justified. Preliminary data on the dose
- 280 range anticipated to be therapeutic can be obtained from non clinical data such as animal models and
- 281 receptor occupancy studies. However dose-response relationships need to be established in clinical
- 282 trials using validated efficacy endpoints. The minimum effective dose and the dose at which most
- 283 efficacy is obtained should be established. Flexible dose designs are unsuitable to provide this
- 284 information and therefore designs with multiple fixed doses and a placebo control are required. It is
- preferred to make direct dose comparisons of multiple doses in a single study. It is strongly
- 286 recommended to establish the dose-response of the investigational drug prior to the start of
- confirmatory trials (Phase 3) as the use of inadequately justified doses may hamper interpretation of
- 288 the latter trials. In addition, the study population in the dose finding studies should preferably reflect
- the entire targeted patient population. For general strategy and design refer also to section 4.4.3.

4.4.3. Confirmatory trials

- 291 The purpose of short term confirmatory trials is to demonstrate the efficacy of the medicinal product
- and obtain initial information on safety in the wide patient population.

4.4.3.1. Study design for short term trials

- 294 Crossover designs are unsuitable for trials in patients with schizophrenia. Confirmatory trials should be
- 295 double-blind, randomised, parallel group trials.

- 296 The study protocol should provide a justification of the choice of the active comparator this would
- 297 normally be an active comparator with a similar clinical pharmacological profile to the test product. If
- 298 the product is the first in its class an appropriate active comparator would be a product licensed in the
- target indication or if no product is licensed in the chosen target population, a medicinal product
- recognised as the "gold standard" in clinical practice should be chosen as a suitable active comparator.
- 301 If the aim of the study is to demonstrate an estimate of non-inferiority to an active comparator, then a
- 302 three-arm study of placebo, test product and active comparator is recommended (see also section
- 303 4.4.3.7.). Superiority to placebo should be demonstrated in order to ensure assay sensitivity of the
- 304 study.

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- 305 Alternatively, a two-arm study of test and active comparator would be acceptable provided superiority
- of the test product over an appropriately justified active comparator was demonstrated.

4.4.3.2. Study population

- 308 Patients should be diagnosed and classified according to the criteria of DSM IV or ICD 10, and
- 309 subsequently classified according to the longitudinal course of their disease (e.g. exacerbation,
- 310 remission, inter-episode residual symptom, or chronically ill). The diagnosis should be made by a
- 311 qualified psychiatrist and confirmed with the use of a structured assessment tool e.g. the SCID-I
- 312 (Structured Clinical Interview for DSM-IV Axis I Disorders). Further descriptive parameters (co-
- 313 morbidity, substance abuse), demographic characteristics and a detailed disease history (duration of
- 314 disease, duration and number of exacerbations, naïve or exposed status, and previous treatment
- 315 outcome) should be documented.
- 316 In contrast to proof of concept studies, for pivotal efficacy studies it is important to maximise external
- 317 validity without unduly compromising internal validity. This may require exclusion of patient groups
- 318 that may introduce confounding by e.g. co-morbidities or concomitant medication. Exclusion criteria
- 319 should be clearly justified.
- 320 Patients in an acute phase (with florid positive symptoms) may generally show a much larger response
- 321 to pharmacological treatment compared to patients in a chronic phase. Therefore, if patients in
- 322 different phases of the disease are included in the same clinical study, stratified randomisation is
- 323 recommended to ensure that the different types of patients are evenly represented throughout
- 324 treatment arms. It is recommended to include at least 20% of patients with a disease history of less
- 325 than 5 years. The inclusion criteria should define the patient population in terms of severity of
- 326 symptoms. Cut-off scores can be based on efficacy measurement scales (e.g. PANSS).

4.4.3.3. Study duration

- 328 The preferred design for demonstrating short term efficacy is a 6 week clinical trial. This is because so
- far for classical antipsychotics, a reasonable stability of effect has been observed as well as some effect
- on negative symptoms, often only after 6 weeks of treatment. Shorter study duration (e.g. 4 weeks)
- 331 could also be considered, especially for drugs with a similar profile to existing antipsychotic drugs,
- 332 although the latter carries the risk of negative results if maximal therapeutic effect is not obtained
- 333 after 4 weeks, and is disadvantageous in terms of demonstrating stability of effect. For new
- 334 compounds with novel mechanism of action, (different from the currently available antipsychotics)
- and/or targeting other domains such as negative symptoms or cognition, the study duration might
- need to be adapted accordingly (see section 4.5).

4.4.3.4. Co-medication

- In the interests of the external validity of the trial, most types of co-medication (e.g. benzodiazepines)
- 339 should be permitted and exclusion criteria for concomitant medications should be justified. It may be
- 340 appropriate to place an upper acceptable limit for benzodiazepine use and to specify that patients
- should be on a stable dose regimen for some time before starting the trial.
- 342 Treatments that may augment the test treatment should be excluded, despite the consequences of
- these exclusions for generalisability of the trial results to the full target patient population. Therefore
- other antipsychotic drugs should be discontinued, except in the case of augmentation studies (see also
- 345 section 4.4.5.).

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- 346 Standardised psychotherapy, psycho-education, support or counselling may be offered as
- 347 supplementary treatment, but their use should be prospectively defined in the protocol and
- documented in the trial report. The effects on treatment should be discussed in the dossier.

4.4.3.5. Screening and run-in periods

- 350 Subsequent to screening, qualitative and quantitative baseline assessments should be conducted in a
- 351 short run-in period. Prior antipsychotic medication should be washed out, normally tapered in a single
- 352 blind placebo run-in period of sufficient duration aiming at elimination of prior treatment without
- 353 substantial worsening of symptoms. Typically a few days will be appropriate for run-in. Placebo
- 354 responders should not be excluded from randomisation. In some instances screening, baseline
- assessments, randomisation and start of study medication may be performed in a single day,
- 356 especially if patients are severely ill.

4.4.3.6. Efficacy parameters

- 358 Primary endpoint(s) should be change from baseline in symptoms of schizophrenia. This should be
- 359 presented as the difference from baseline to end measurement on the endpoint symptom score.
- 360 Obtained results should be discussed not only in terms of statistical significance but also in terms of
- 361 clinical relevance. Presentation of the proportion of patients with a pre-specified degree of
- 362 improvement on the symptom score is valuable. For this purpose, responder analyses should be
- presented. Also the proportion of patients deteriorating during treatment should be documented.
- 364 In short term trials in patients with acute/exacerbated symptoms at least 30% reduction on the total
- PANSS compared to baseline is generally considered to be clinically relevant and can be accepted as a
- definition of responder. For sensitivity analyses the presentation of additional responder analyses using
- 367 alternative criteria for response rates is recommended, i.e. the proportion of patients with minimal and
- 368 with substantial improvement.

4.4.3.7. Statistical considerations

- 370 Reference is made to the ICH E9 statistical principles for clinical trials.
- 371 The standard three way trial design is intended to show superiority to placebo and to quantify efficacy
- 372 compared to a comparator drug. Analysis populations should include the full analysis set (FAS) and the
- 373 per protocol (PP) population.
- 374 A major problem with both short and longer term trials in schizophrenia relates to patient withdrawals
- and consequent missing data. All reasonable steps should be taken to minimise their occurrence and to
- 376 follow patients regardless of adherence to protocolled treatment. Reasons for drop outs should be
- documented (especially to distinguish between lack of efficacy and undesirable effects). In this respect,

- 378 special attention should be drawn to the issue of compliance, which is a problem in patients with
- 379 schizophrenia. Assessment of compliance should be ensured during clinical studies by measurement of
- 380 drug plasma levels, tablet counting, repeated urine screenings for additional illicit psychotropic
- 381 substances.
- 382 Commonly used analysis techniques and methods for handling missing data are frequently not likely to
- 383 be conservative, leading to a probable bias in the results in favour of the experimental treatment. In
- 384 particular, differential dropout rates (for safety/tolerability or efficacy reasons) and variable natural
- 385 course of the disorder (spontaneous remissions or exacerbations) can bias the results under this
- 386 method of missing data imputation.
- 387 Reference is made to the CHMP guideline on missing data in confirmatory clinical trials and the advice
- therein to consider the problem of missing data in advance of the trial, and provide detailed discussion
- 389 of the missing data pattern observed and potential biases introduced once the trial has been
- 390 completed.

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4.4.4. Study design for long term trials

- 392 Due to the chronic course of schizophrenia (with exacerbations) and the need for lifelong treatment,
- double-blind controlled studies are necessary in order to demonstrate that the effect found in the acute
- 394 phase is maintained.
- 395 To demonstrate maintenance of effect, several study designs are possible: parallel design (with
- 396 placebo and/or active comparator) or randomised withdrawal design.
- 397 Extension studies may provide evidence of maintenance of efficacy as long as they stay double blind. A
- 398 parallel trial using active comparator is the first possibility. When the objective is to show non-
- inferiority, the active control should be a product with a well documented efficacy in the maintenance
- 400 of treatment effect in schizophrenia. Due to the natural course of the disease, the duration of such a
- 401 trial should be 12 months and the assay sensitivity should be fully substantiated.
- 402 Another alternative is a randomised withdrawal design study, in which responders to the short-term
- 403 treatment are included and randomised either to the study medication or to placebo. When this design
- 404 is applied, it may be useful to first stabilise the patients in an open label treatment period of sufficient
- 405 duration. Blinding patients to the time point of onset of randomised treatment is preferred to avoid
- 406 unblinding due to patient awareness of treatment allocation, as this could potentially increase bias in
- 407 favour of the test product.
- 408 A third alternative is a two-arm placebo controlled trial with duration of 6 months. When designing
- 409 such a trial, some possible hurdles should be considered such as recruitment of mostly chronic
- 410 patients, ethical issues, and the probability of higher drop out rates. Therefore handling of missing
- values should be pre- specified in the study protocol.

4.4.4.1. Efficacy parameters in long term studies

- 413 The primary efficacy variables to measure maintenance of effect would depend on the design of the
- 414 clinical study.

- 415 In parallel design studies, the primary efficacy should be measured as the difference between baseline
- and endpoint on the symptom score, as in the short term studies. Drop out rates which indicate a
- 417 treatment failure could be included as a key secondary endpoint.
- 418 In a randomised withdrawal design, the primary efficacy measure would be time to exacerbation of
- symptoms using pre-specified criteria. Patients with exacerbations must be clearly distinguished from

- 420 withdrawals due to other reasons. The duration of the randomised treatment period should be
- 421 sufficient to ensure that the number of patients with exacerbation (event rate) is sufficient for
- adequate statistical power for the comparison with active comparator or placebo.
- 423 In parallel and randomised withdrawal studies, the proportion of patients with exacerbations at pre-
- 424 specified time points should be analysed.
- 425 In some cases, if the dose-response data from short term trials is insufficient, dose finding for long-
- 426 term treatment using multiple doses of the investigational product may be required.

4.5. Specific claims

4.5.1. Efficacy on negative symptoms

- 429 If an effect on negative symptoms is claimed, specially designed studies in patients with predominant
- 430 negative symptoms should be conducted. The duration of negative symptoms and onset of the current
- 431 stable episode of schizophrenia should be documented. To ensure that patients with negative
- 432 symptoms, other than related to depressive symptoms or EPS, are studied, the inclusion criteria should
- 433 encompass:

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- a) Predominant and persistent negative symptoms.
- b) Flat affect and poverty of speech being present as representative of core negative symptoms
- 436 c) Stable condition of schizophrenic illness for longer than 6 months, especially of the negative
- 437 symptoms.
- 438 Excluded should be:
- d) Major depression; low depression scores are preferable.
- e) Subjects with substantially confounding extra-pyramidal symptoms and cognitive impairment.
- 441 f) Substantial non-compliance or substance abuse.
- Improvement on negative symptoms should be demonstrated through validated scales (e.g. PANSS
- 443 negative subscale, SANS or other), and presented as the difference between baseline and endpoint.
- 444 Responder rates should be provided as well, and functional improvement as key secondary outcome is
- recommended.

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4.5.2. Efficacy on cognitive functioning

- 447 To support a separate claim for efficacy on cognitive aspects in patients with schizophrenia, specific
- studies should be performed. The patient population should be clearly defined in terms of a range of
- 449 relevant measures of cognitive functioning. A relatively younger patient population might be more
- 450 appropriate for testing effect on cognition in schizophrenia, since with disease progression response to
- 451 treatment of cognitive impairment may decline.
- 452 Similarly, the effect of treatment on cognitive functioning should also be demonstrated as the
- 453 difference between baseline and endpoint on the cognitive functioning scale. Whatever tool is used,
- 454 mere reduction on specific items of a larger test battery is not acceptable. The outcome should be such
- 455 that relevance to the patients functioning is clear.

4.5.3. Trials to study monotherapy in treatment resistant patients

- 457 Monotherapy in patients with treatment resistant schizophrenia could be a separate but additional
- 458 claim. This could be granted to compounds with an adequately substantiated general schizophrenia
- 459 indication. At least one additional trial should be performed to support extension of the indication to
- 460 treatment resistant patients. Subgroup analyses among treatment resistant patients in trials conducted
- 461 in a general schizophrenia population are not sufficient to obtain the extended indication although they
- 462 could provide useful supporting data.
- The design of studies and endpoint in therapy resistant patients are essentially the same as described
- 464 for other trials (see section 4.4.3.). The key differences are the choice of control and the definition of
- 465 the patient population.
- 466 Treatment resistance in schizophrenia is defined as lack of satisfactory improvement despite the use of
- adequate doses of at least two different antipsychotic agents, including an atypical antipsychotic agent,
- 468 prescribed for adequate duration with adequate affirmation of treatment adherence and abstinence
- 469 from CNS-active illicit drugs. It should be clearly demonstrated that the patients included in the trial
- are treatment resistant indeed and for this scope at least one treatment failure should be prospectively
- 471 shown.

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- 472 The choice of active comparator should be clearly justified. The primary objective of a trial of this
- design would be to demonstrate superiority to the active comparator (the medicinal product with which
- 474 an insufficient response has been achieved during the second treatment of the patient) or non-
- 475 inferiority to clozapine (which has the indication treatment resistant schizophrenia). In schizophrenia
- 476 superiority trials are generally preferred to non-inferiority trials because of the difficulties in assuring
- assay sensitivity. A three way trial in which the primary objective is to show superiority to an atypical
- 478 antipsychotic, with clozapine monotherapy as a third arm to provide a context for the magnitude of the
- treatment effect, might be preferable to a two way design. If short term efficacy in this TRS patient
- 480 population has been demonstrated, long term studies would not be required, since maintenance of
- 481 effect could be extrapolated from the studies performed for the general schizophrenia indication.

4.5.4. Trials to study augmentation/add on treatment

- 483 Currently compounds which have a different mechanism of action (different from that of typical and
- 484 atypical antipsychotics) are developed for augmentation strategies. The use of such compound to
- augment the activity of another product (antipsychotic) is worth a specific claim leading to a separate
- 486 indication statement. Augmentation may particularly be useful in case of insufficient response to
- 487 monotherapy. The patient population might include insufficient response to one or more antipsychotics,
- 488 and the insufficient response might refer mainly to specific symptom domains. Therefore it is
- recommended to define the patient population to be included in the studies in terms of number of
- 490 failures and domains with insufficient effect.
- 491 Treatment refractory patients (who show no change from baseline as result of treatment) are not
- 492 suitable candidates for augmentation since there is no response to augment. These patients should be
- 493 switched to an alternative monotherapy instead and therefore should be excluded from augmentation
- 494 trials (see section 4.5.3).
- 495 In the recommended standard short term trial with parallel design for an augmentation indication
- 496 patients are randomised to receive active augmentation treatment or placebo in addition to open label
- 497 standard medication (prospective design). A list of appropriate baseline standard medications should
- be defined in the trial protocol. Trial duration of 4-6 weeks is likely to suffice for demonstration of short
- 499 term efficacy although typically substantially longer durations may be necessary according to the
- nature of the test treatment and patient population.

- A comparison with an established treatment is generally valuable in schizophrenia trials to estimate the
- 502 clinical value of the test treatment. Currently no products have been approved for an augmentation
- 503 indication. Therefore a third treatment arm with an active comparator cannot be recommended at
- present for augmentation trials.
- 505 Maintenance of effect of long term augmentation treatment can be demonstrated in a randomised
- 506 withdrawal design similar to the general schizophrenia indication. In this case responders to a
- 507 combination treatment of a known antipsychotic and the new compound are randomised to one of the
- 508 following three treatments: combination therapy, monotherapy antipsychotic, and monotherapy new
- 509 compound (if appropriate).
- 510 An alternative is a long term trial with parallel design, in which patients are randomised either to the
- 511 test product or placebo added to a well established antipsychotic to which patients have shown a
- 512 partial response.

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513 Drug interactions should be studied prior to pivotal augmentation studies.

4.6. Special populations

4.6.1. Paediatric population

- 516 There are a number of significant differences in the typical clinical presentation, severity and natural
- 517 course of schizophrenia in adolescents compared to adults. Extrapolation of adult data to adolescents is
- 518 not considered appropriate and specific studies are necessary to provide sufficient data on efficacy and
- 519 safety. Because of the difficulties in diagnosis and low prevalence in younger children, it is not
- 520 considered necessary to perform clinical studies in children under the age of 13 years.
- With regard to the adolescent patient population, similar diagnostic criteria (DSM IV) apply. Compared
- with adults there is a high degree of co-morbidity (e.g. autism) and overlap with symptoms of other
- 523 psychiatric conditions. Because misdiagnosis at young age is a problem, a thorough and critical
- 524 assessment including psychiatric, psychological and physical examination should be performed by
- 525 clinical experts. In general the diagnosis of schizophrenia can only be established if all criteria are met
- and alternative psychiatric, neurological or other medical causes of symptoms have been excluded.
- 527 Studies in adolescents should include sufficient patients of each age range. The age distribution should
- reflect the target patient population. Stratification of patients into two groups by age, e.g. 13-15 years
- versus 16-18 years, or by sexual development stage is recommended since the clinical features and
- 530 incidence of schizophrenia may differ between strata. Separate studies in subgroups are not required.
- 531 Early treatment of prodromal symptoms or prevention of progression to full schizophrenia is not
- sufficiently investigated to be applicable at this moment.
- 533 The design of the studies and measurement tools are in general similar to the adult studies. It may be
- preferable to amend the rating scale tailoring it to the requirements of the adolescent population, and
- such amendments should be well justified and discussed.
- 536 Efficacy measures should include cognitive and functional outcomes. Efficacy in acute treatment should
- 537 be demonstrated in at least one short term trial of 4-6 weeks duration (or longer). Maintenance of
- 538 efficacy (6-12 months) and long term safety data (2 years) should be generated as well. Special
- attention should be given to possible adverse effects on sexual maturation, cognition, endocrine
- 540 function and other aspects of development. Undesirable effects relating to changes in prolactin levels
- should be actively studied (see section 4.7).

542 **4.6.2. Elderly**

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- 543 For the general indication "treatment of schizophrenia" no specifically designed trials in elderly patients
- are necessary. However, information for this group concerning dose recommendations and safety is
- 545 necessary. Therefore the number of elderly patients included in the studies should suffice to generate
- 546 this data. Safety data should be analysed separately with special attention to safety concerns relevant
- to this age group e.g. (cardio-) vascular and stroke events, as well as diabetes and CNS effects.

4.7. Safety evaluation

- In general the content of ICH E1 should be taken into consideration.
- 550 Identified adverse events (AEs), including serious AEs and AEs leading to withdrawal, should be
- 551 characterised in relation to duration of treatment, dosage, recovery time, age, and other relevant
- variables. Adverse event scales should be standardised for use in studies with psychotropic drugs (e.g.
- 553 UKU scale). Clinical observations should be supplemented by appropriate laboratory tests and other
- appropriate investigations (e.g. ECG). AE rates should be presented for the test treatment, placebo
- and active comparators.
- 556 As treatment durations including the long term open label trials will generally be longer for the test
- treatment as compared to other treatments (e.g. placebo), the data should be presented in a suitable
- way for comparisons of event rates.
- 559 Special efforts should be made to assess potential AEs that are characteristics of the class of drugs
- being investigated in view of actions on specific receptor sites. Particular attention should be paid to
- anti-dopaminergic, anti-cholinergic or cholinergic, anti-histaminergic, serotoninergic and a-adrenergic,
- and to glutamatergic or anti-GABAergic AEs, if relevant.

4.7.1. Specific adverse events to be monitored

Extrapyramidal symptoms (EPS)

- For dopaminergic products rates of extrapyramidal symptoms should be presented. In addition the
- extent and severity of EPS should be actively measured using validated and specifically designed rating
- scales. Dose response relationships of EPS should be explored. During the wash out phase prior to
- acute studies, possible tardive EPS should be measured to distinguish this from acute EPS due to the
- test treatment.
- 571 Any claims concerning a lower incidence of EPS as compared to alternative treatments should be
- 572 substantiated by robust comparisons with at least one active control with consideration of both clinical
- 573 and statistical significance.
- Tardive dyskinesia occurs late in treatment and is reported for both atypical and typical antipsychotics.
- 575 The possibility that a test drug might cause tardive dyskinesia cannot be excluded in the typical clinical
- 576 development programme and therefore the possibility should be mentioned in the SPC even if there
- are no reported cases.
- 578 Specific claims regarding propensity to cause tardive dyskinesia must be substantiated using the same
- 579 criteria as for other types of EPS.

Psychiatric adverse events

- 581 Psychiatric adverse events typically represent a large proportion of the AEs reported in trials in
- schizophrenia patients. These events may be related to the disorder itself as well as to the study
- 583 medication. In order to explore the risk of an adverse effect on the severity of the disorder being
- 584 treated, the proportion of patients deteriorating during treatment should be documented using the
- primary efficacy measure.
- 586 As part of the adverse event data, undesirable psychiatric effects including depression and anxiety
- should be measured using validated rating scales.

Adverse effects on cognitive functioning

- 589 A detrimental effect on cognition should be monitored using validated rating scales, which may be
- 590 identical to those used to support an efficacy claim. Effects on cognition, reaction time, driving and
- 591 severity of sedation should also be studied. In the adolescent population specific issues such as
- 592 memory, learning, school performance, etc. should be studied in relation to both the safety and
- 593 efficacy perspective.

594 Suicide

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- 595 The potential for the test product to precipitate suicidal thoughts and behaviour should be actively
- 596 measured using validated rating scales (e.g. InterSePT Scale for Suicidal Thinking, Columbia
- 597 Classification Algorithm for Suicide Assessment). Rates of suicidal events (from suicidal ideation to
- 598 completed suicide) should be presented and narrative summaries of suicidal patient statements or
- 599 behaviours should be provided.

Metabolic risk factors

- 601 The effects on weight, glucose metabolism and lipid metabolism should be actively measured using
- 602 standard laboratory measures. The metabolic profile of the test product should be thoroughly
- characterised in comparison with placebo and active comparator(s).

Neuroleptic malignant syndrome (NMS)

- Neuroleptic malignant syndrome (NMS) has been reported for all antipsychotics. Therefore possible
- 606 cases should be thoroughly investigated and reported. The possibility that a test drug might cause
- 607 NMS cannot be excluded in a typical clinical development programme. Therefore the possibility should
- 608 be mentioned in the SPC for drugs of this class even if there are no reported cases.

Haematological adverse events

Special attention should be paid to incidence of neutropenia, agranulocytosis and aplastic anaemia.

Endocrinological adverse events

- 612 Special attention should be paid to effects on sexual functioning, galactorrhoea, gynaecomastia and
- 613 weight gain. Investigation of neuro-endocrinological parameters relating to prolactin is necessary. In
- 614 the adolescent population effects on growth and sexual maturation require specific attention and
- should be closely monitored.

Cardiovascular adverse events

- Due to the known cardiovascular effects of this class of drugs, cardiac adverse events should be
- 618 actively monitored. Reported adverse events that might represent orthostatic hypotension or
- 619 arrhythmia (including syncope, loss of consciousness, etc) should be presented where relevant. The
- 620 effect on QT-interval prolongation should be investigated in accordance with the ICH E14 guideline.

621 **4.7.2. Long term safety**

- 622 The total clinical experience should include data on exposure of a large and representative group of
- 623 patients in line with the quideline on population exposure (ICH E1).

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