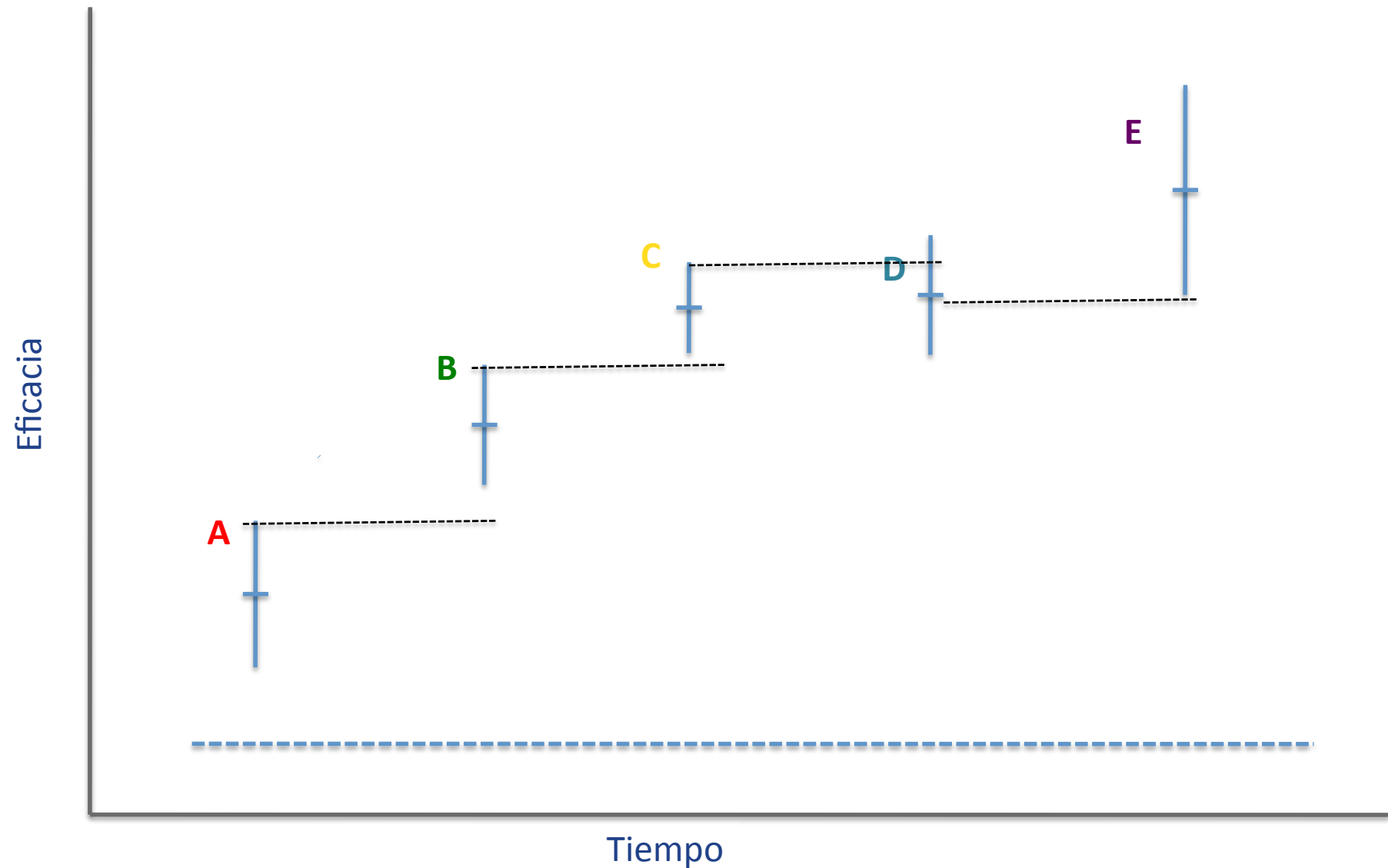


# Un cuento de superioridad, equivalencia y no inferioridad

Olga Delgado  
Hospital Son Espases  
Palma

Palma, jueves 10 mayo 2012  
30 minutos

de la superioridad a la no-inferioridad



# ¿por qué se realizan estudios no-inferioridad?

- Éticas
- Mayor seguridad
- Mayor comodidad
- Eficacia difícil superar
- Tratamientos alternativos o segundas líneas
- Conocer la eficacia comparada

# el mundo al revés



# ¿cómo se plantean los ensayos?

	HIPÓTESIS NULA H(o)	HIPÓTESIS ALTERNATIVA H(a)
SUPERIORIDAD	$C=E$ Son iguales	$E \neq C$ Son diferentes
	HIPÓTESIS “ya no tan” NULA H(o)	HIPÓTESIS ALTERNATIVA H(a)
EQUIVALENCIA	$C \neq E$ Son diferentes	$C \approx E$ Son equivalentes
	HIPÓTESIS “tampoco” NULA H(o)	HIPÓTESIS ALTERNATIVA H(a)
NO-INFERIORIDAD	$C - E \geq M$ La diferencia es mayor de lo aceptado	$C - E < M$ La diferencia está en el margen de NI

*Dunnett CW, Gent M. Biometrics 1977; 33: 593-602.*

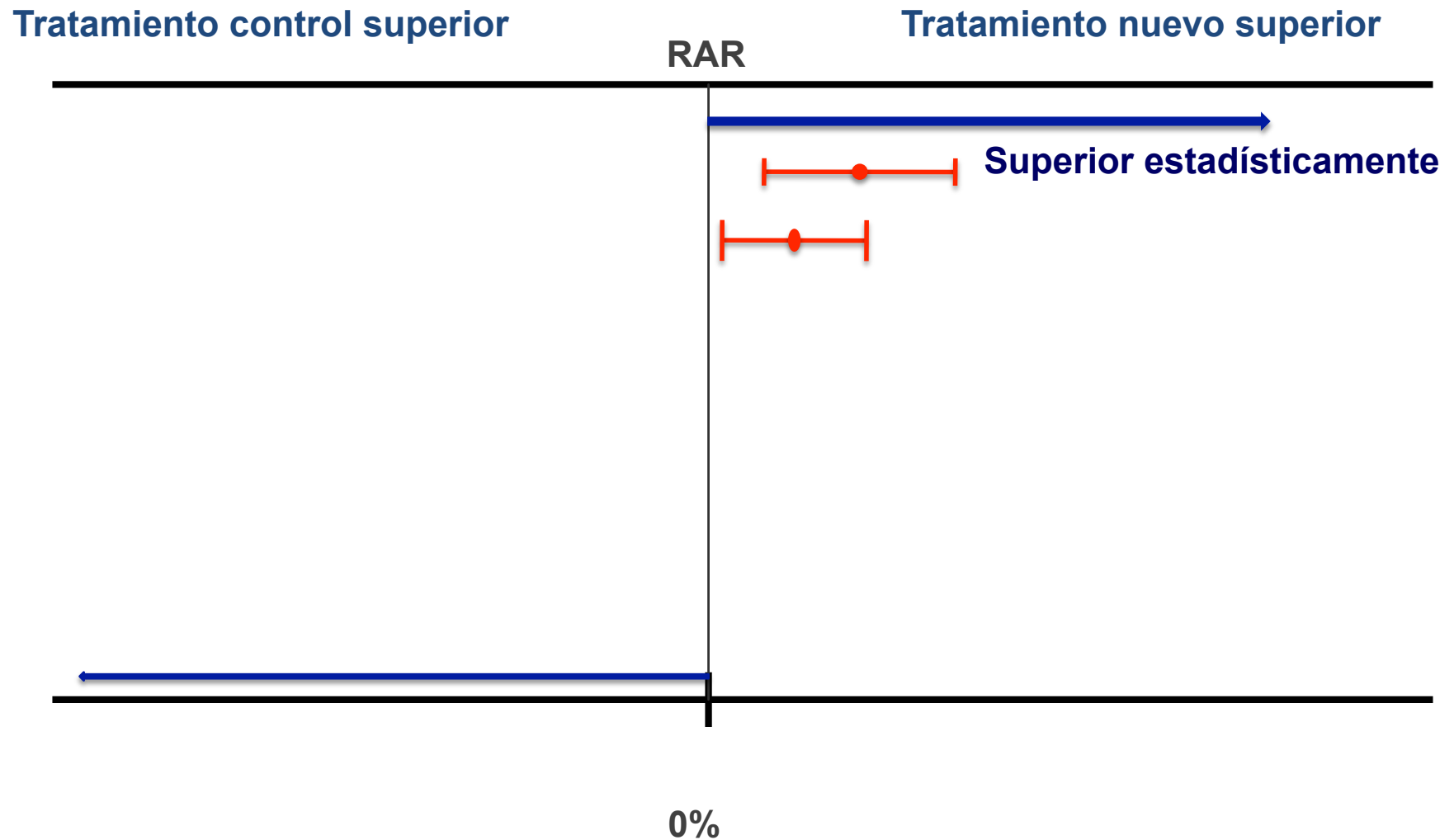
*Blackwelder WC. Control Clin Trials 1982; 3: 345-53.*

# La hipótesis “no nula” es solo la primera sorpresa de Alicia

esto no ha hecho  
más que empezar...



# Comparación gráfica de tipos de estudios

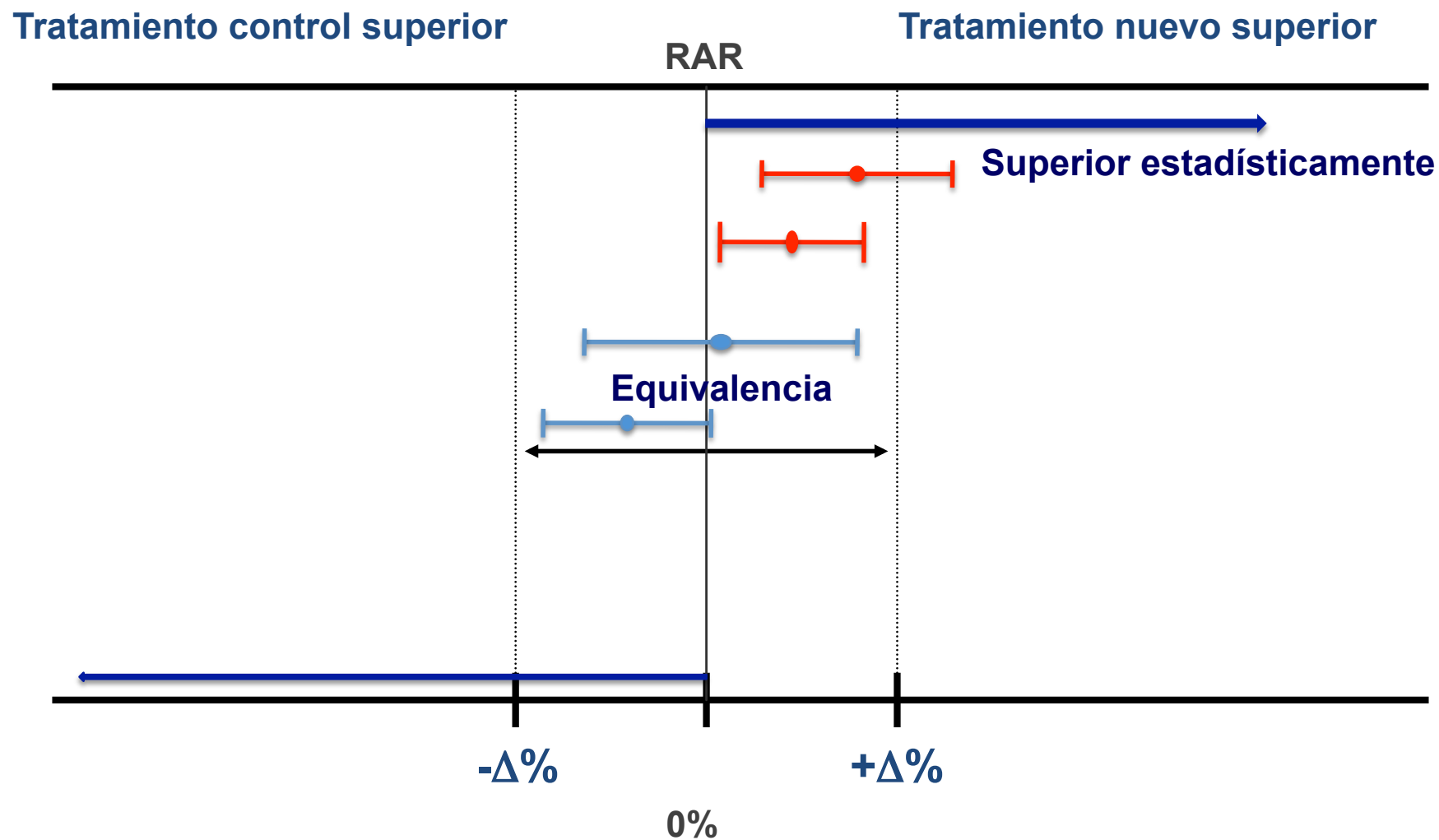


# Equivalencia terapéutica

La diferencia entre los tratamientos está dentro de un margen preestablecido que se considera clínicamente irrelevante.



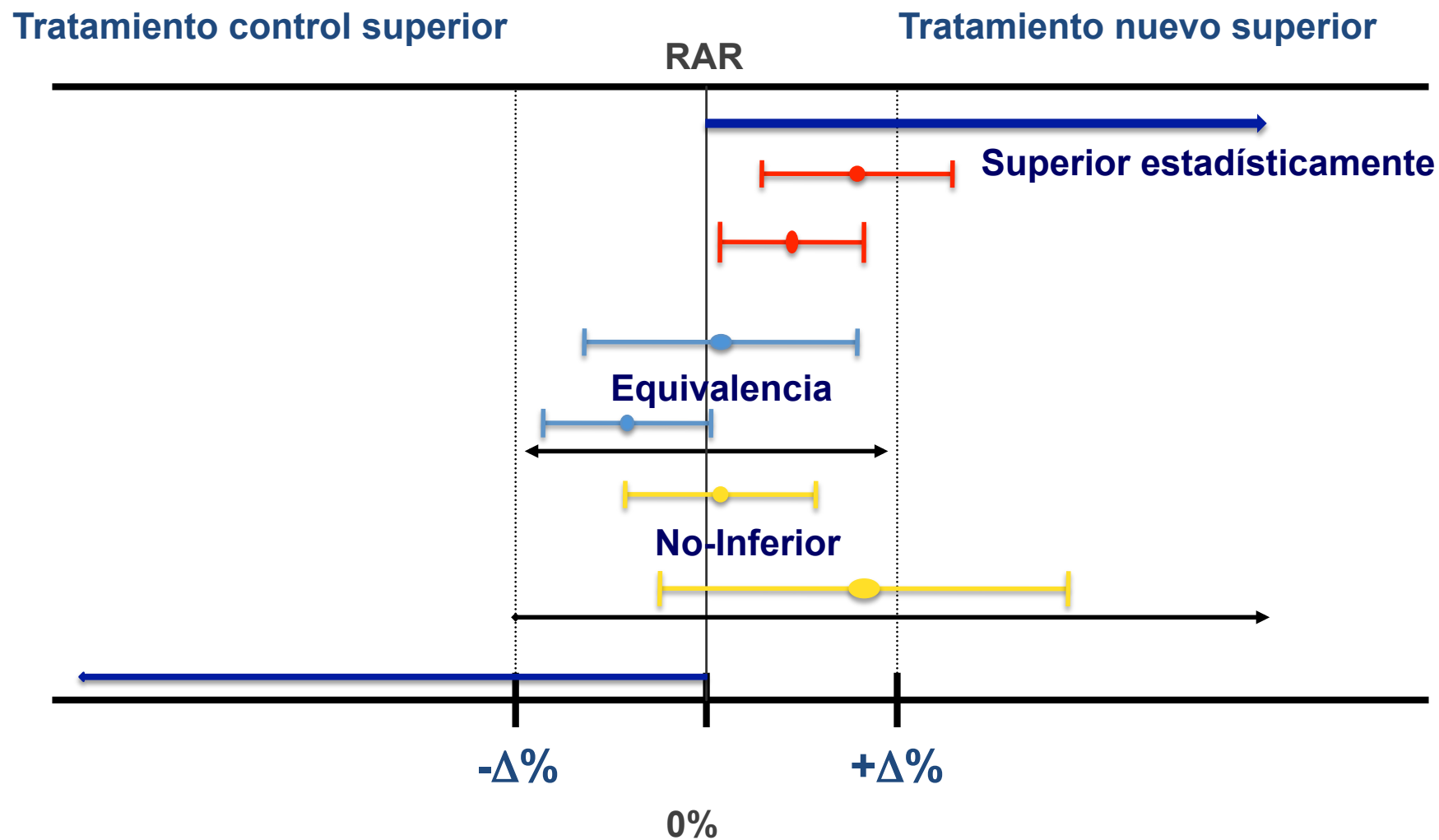
# Comparación gráfica de tipos de estudios



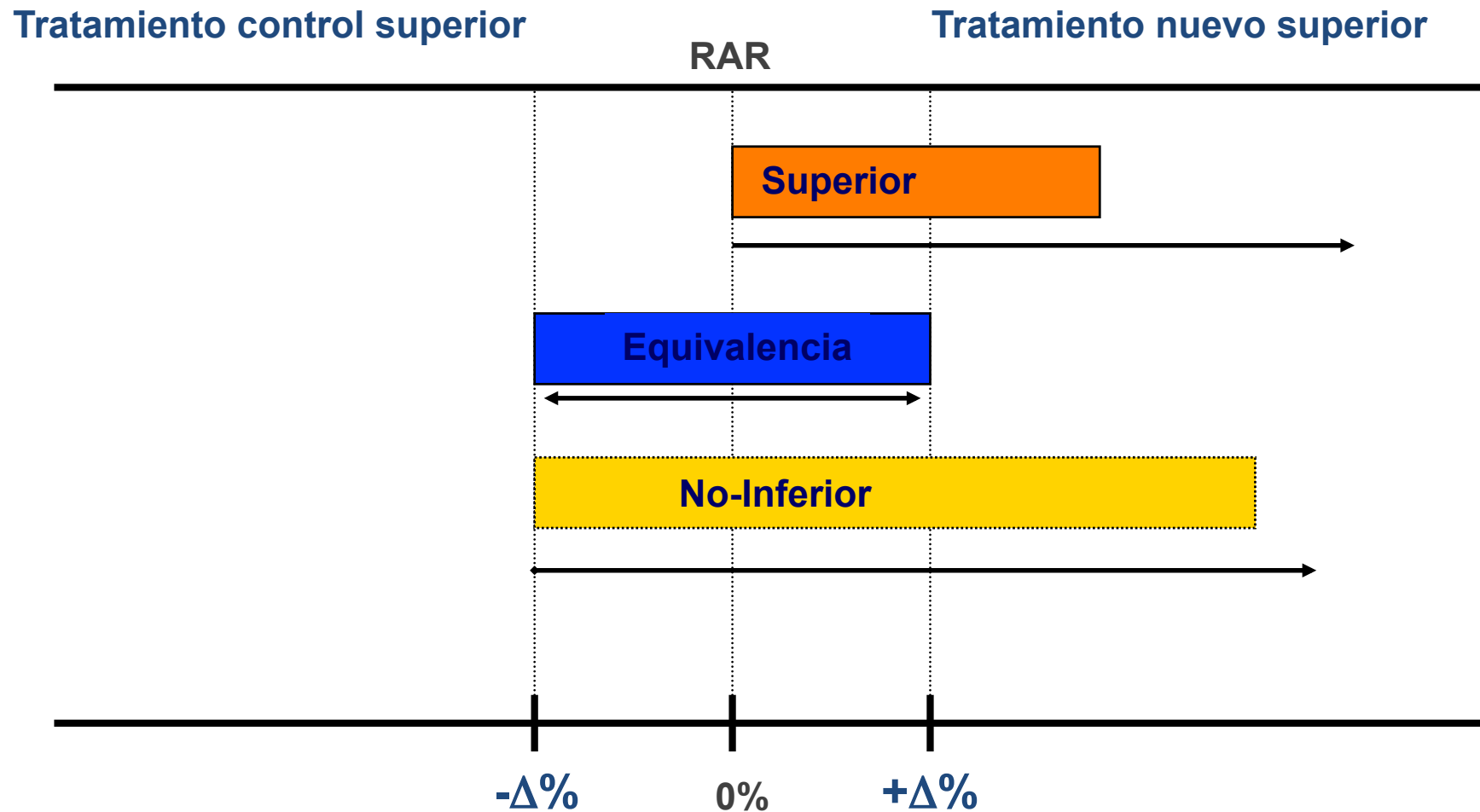
# No inferioridad

La nueva intervención no es peor que el control, o mejor dicho, no es “inaceptablemente” peor que el control.

# Comparación gráfica de tipos de estudios



# Comparación gráfica de tipos de estudios



### 3. *Study Design Options*

- Superiority trial designs

Phase-3 superiority trials can include *add-on* or *substitution* comparisons. In the first case, the investigational drug plus a standard combination regimen is compared to placebo plus the same standard regimen. In some cases, an experimental drug could be added to a background regimen of drugs that the participant or investigator chooses from a list of possibilities.

For substitution comparisons, the investigational drug is substituted for a component of a standard regimen. This regimen is then compared to the standard regimen.

- Noninferiority trial designs

Noninferiority trials use substitution comparisons as described above. For noninferiority comparisons, it is important that the contribution of the substituted drug to a regimen's overall activity be previously characterized in the population of interest. This is often referred to as a study's *assay sensitivity*. This information should be used to support a noninferiority comparison and to calculate an appropriate sample size. This will be discussed further under section III. C. 3., Choice of Control Arms.

# Objetivo

ORIGINAL ARTICLE

N ENGL J MED 364:5 NEJM.ORG FEBRUARY 3, 2011

## Fidaxomicin versus Vancomycin for *Clostridium difficile* Infection

Thomas J. Louie, M.D., Mark A. Miller, M.D., Kathleen M. Mullane, D.O.,  
Karl Weiss, M.D., Arnold Lentnek, M.D., Yoav Golan, M.D.,  
Sherwood Gorbach, M.D., Pamela Sears, Ph.D., and Youe-Kong Shue, Ph.D.,  
for the OPT-80-003 Clinical Study Group\*

### STATISTICAL ANALYSIS

The trial was designed as a noninferiority study. A one-side lower 97,5% confidence interval was used in the analysis of the primary end point, the rate of clinical cure, with a noninferiority margin of -10 percentage points. If the lower bound of the confidence limit was within the 10-percentage-point margin, clinical noninferiority was demonstrated. The secondary end points of recurrence and overall cure, which

# Efficacy and Safety of Tenofovir DF vs Stavudine in Combination Therapy in Antiretroviral-Naive Patients

A 3-Year Randomized Trial JAMA, July 14, 2004 (292)No.2

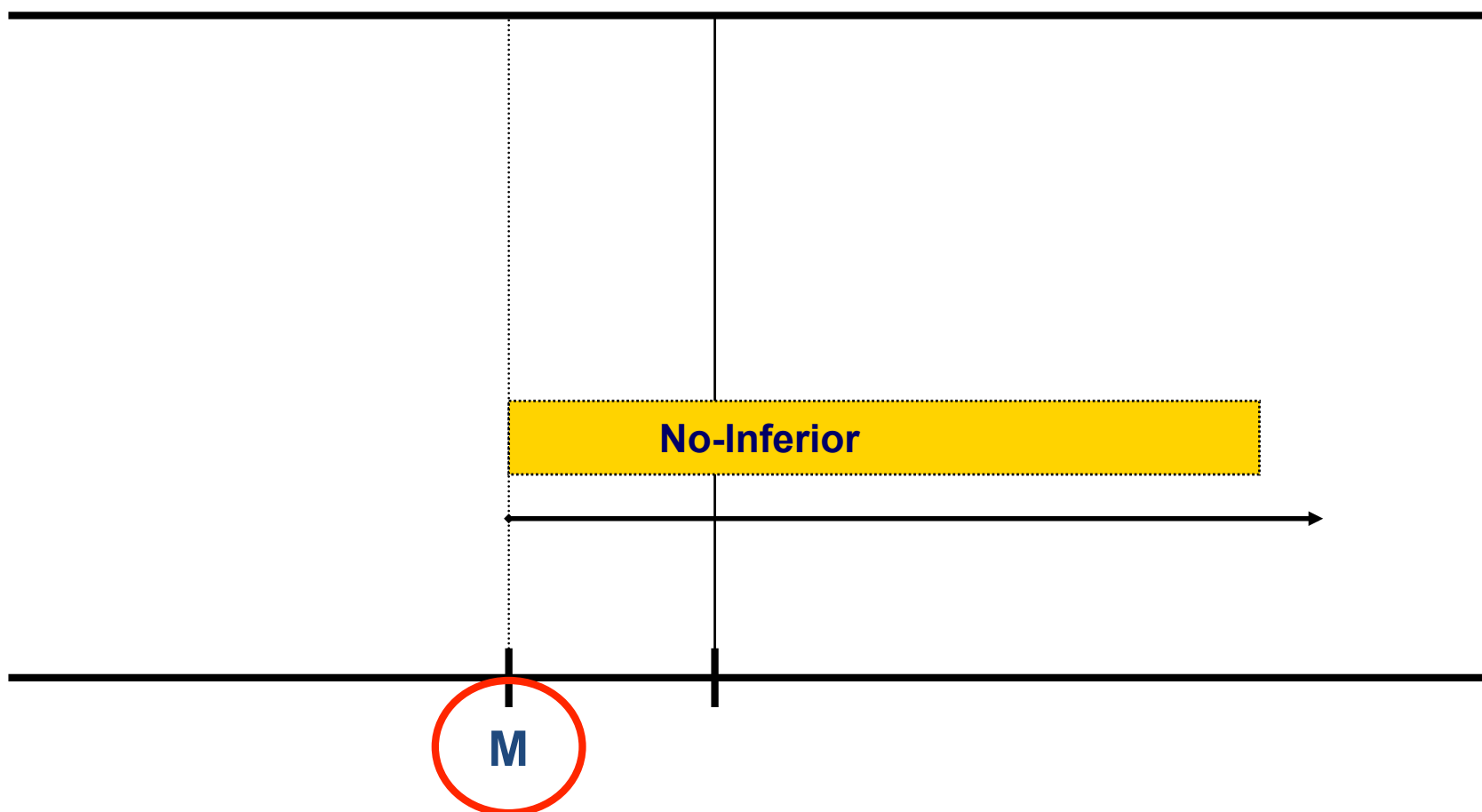
The primary objective of this study was to assess the equivalence of tenofovir DF vs stavudine in combination with lamivudine and efavirenz for the treatment of patients infected with HIV who were antiretroviral naive as determined by the proportion of patients in each regimen with plasma HIV RNA levels of less than 400 copies/mL. The sec-

There was no upper bound for the predefined CIs because the study was designed as a noninferiority trial (ie, equivalence) and the lower bound of the 2-sided 95% CI for the difference of the primary end point (the tenofovir DF group – stavudine group) was compared with -10% to determine noninferiority of tenofovir DF relative to stavudine.

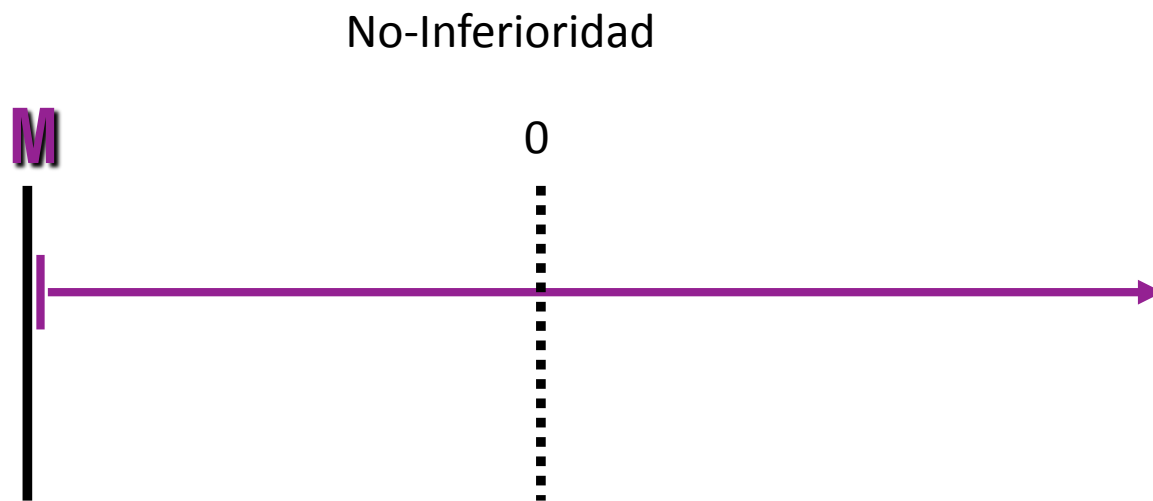
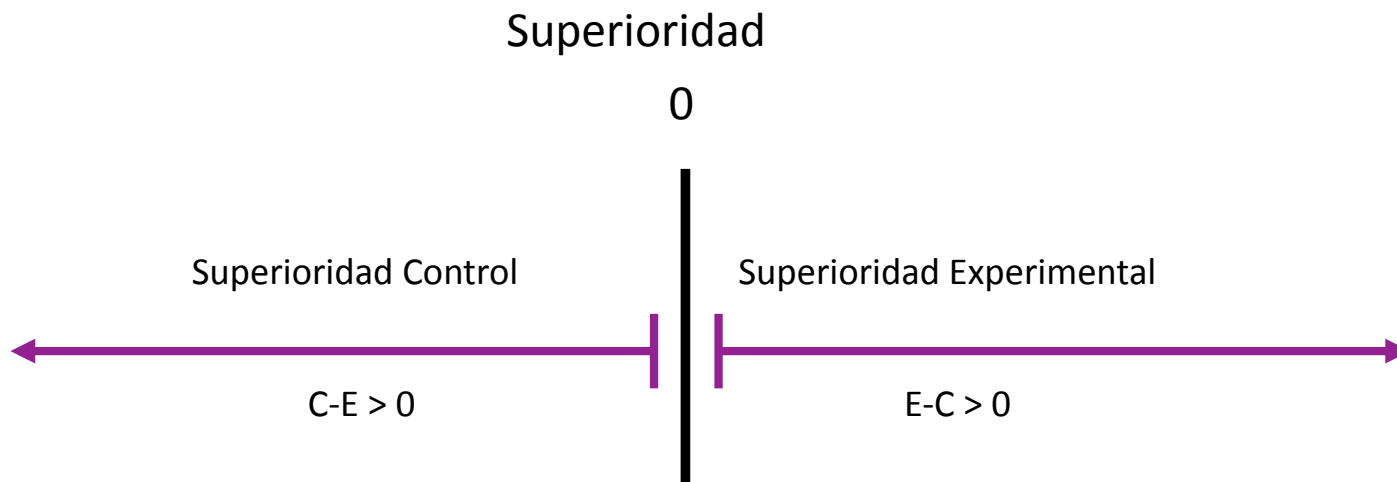
# Margen no-inferioridad

Tratamiento estándar superior

Tratamiento alternativo superior







I   
NI



European Medicines Agency  
Pre-authorisation Evaluation of Medicines for Human Use

London, 27 July 2005  
Doc. Ref. EMEA/CPMP/EWP/2158

COMMITTEE FOR MEDICINAL PRODUCTS FOR HUMAN USE  
(CHMP)

GUIDELINE ON THE CHOICE OF THE NON-INFERIORITY MARGIN

DRAFT AGREED BY THE EFFICACY WORKING PARTY	December 1999 – January 2004
ADOPTION BY COMMITTEE FOR RELEASE FOR CONSULTATION	February 2004
END OF CONSULTATION (DEADLINE FOR COMMENTS)	May 2004
AGREED BY WORKING PARTY	June 2004
ADOPTION BY COMMITTEE	July 2005
DATE FOR COMING INTO EFFECT	January 2006

# Guidance for Industry Non-Inferiority Clinical Trials

## ***DRAFT GUIDANCE***

**This guidance document is being distributed for comment purposes only.**

Comments and suggestions regarding this draft document should be submitted within 90 days of publication in the *Federal Register* of the notice announcing the availability of the draft guidance. Submit comments to the Division of Dockets Management (HFA-305), Food and Drug Administration, 5630 Fishers Lane, rm. 1061, Rockville, MD 20852. All comments should be identified with the docket number listed in the notice of availability that publishes in the *Federal Register*.

For questions regarding this draft document contact Robert Temple at 301-796-2270 or Robert O'Neill at 301-796-1700 (CDER), or the Office of Communication, Outreach, and Development (CBER) at 301-800-835-4709 or 301-827-1800.

U.S. Department of Health and Human Services  
Food and Drug Administration  
Center for Drug Evaluation and Research (CDER)  
Center for Biologics Evaluation and Research (CBER)

March 2010  
Clinical/Medical



1. Oráculo del juicio clínico y la experiencia de pacientes:  
Preguntar a médicos y pacientes el grado de eficacia que estarían dispuestos a sacrificar por los beneficios de un nuevo tratamiento

2:25 – 2:40 p.m. BREAK

2:40 – 3:00 p.m. The perspective of industry: non-inferiority trials for CAP  
*Eddie Power*

3:00 – 3:30 p.m. How to define an evidence-based non-inferiority margin with degrees of unavoidable uncertainty  
*Tom Fleming*

#### **Endpoints**

#### **Current knowledge of the “treatment effect” in clinical trials of outpatient pneumonia**

10:50 – 11:20 a.m. What criteria should be addressed to do a credible non-inferiority trial and why is this clinically important?  
*Tom Fleming*

11:20 – 11:35 a.m. Q&A Panel

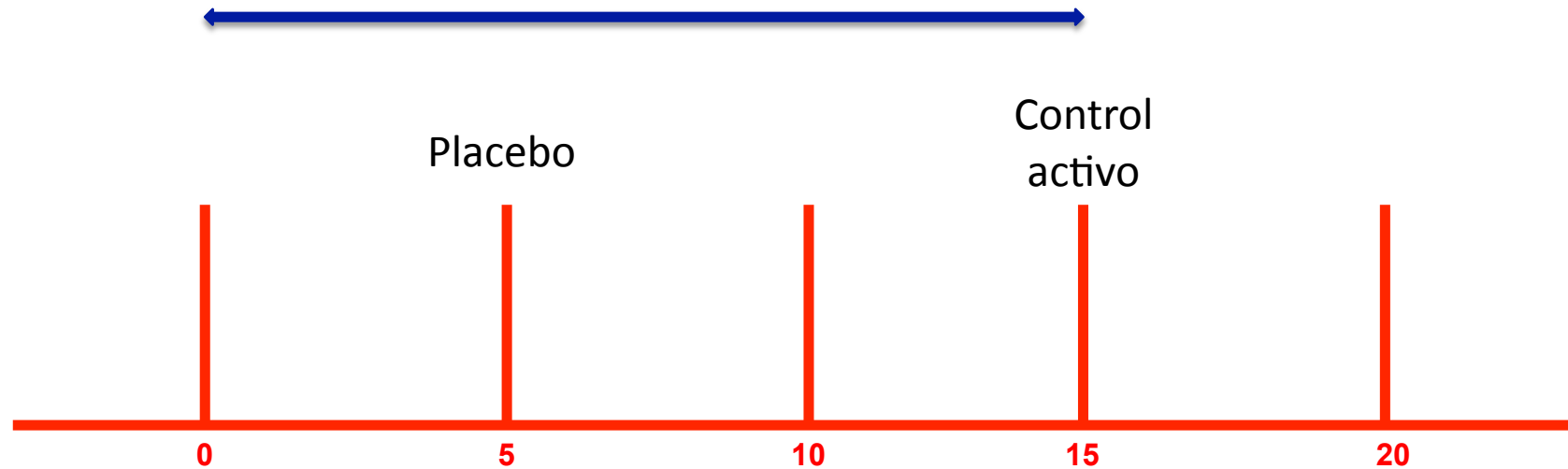


## 2. Oráculo matemático o método Rothmann o 95%-95%

Conocer M1: efecto control/efecto placebo; IC 95%

Conocer M2: la máxima pérdida de eficacia clínicamente aceptable

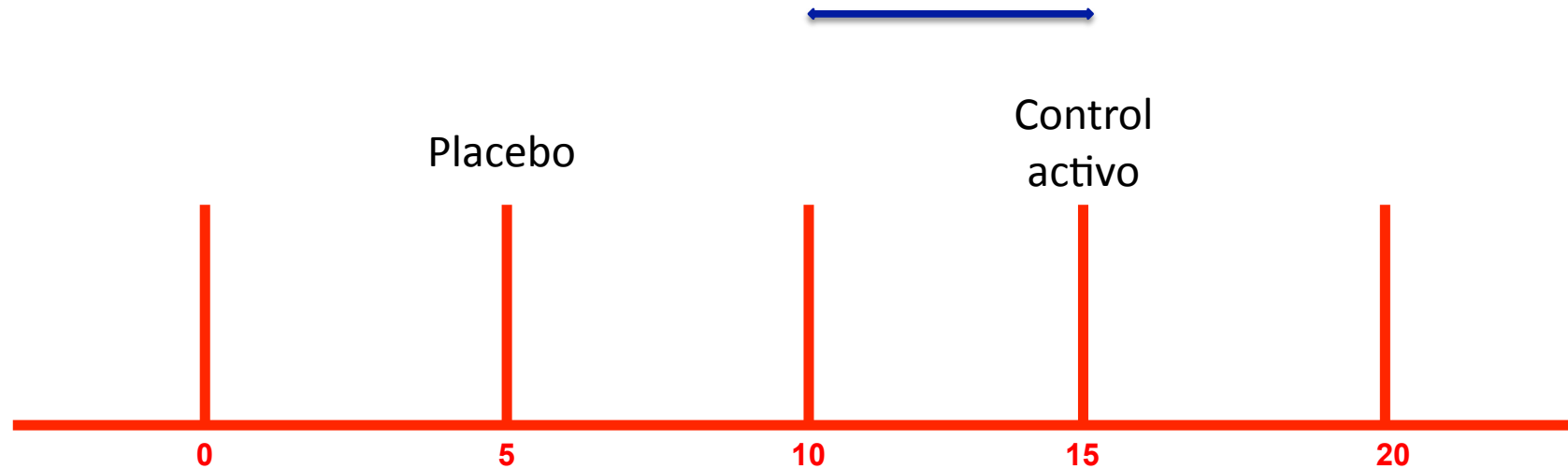
1. No puede ser mayor que el efecto del control  
M1.



$$M1 < C$$

Cáncer: Equivalencia 20% supervivencia  
Control no lo había demostrado frente a placebo  
Temple, 2008.

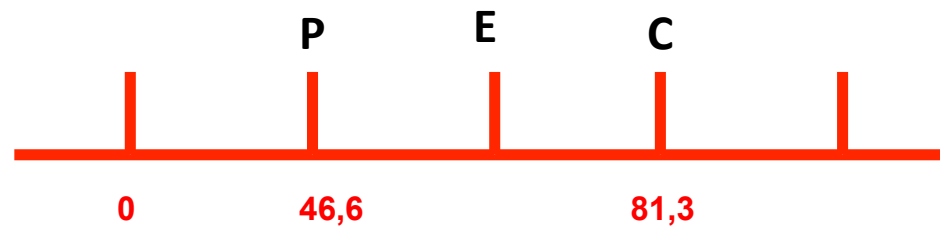
2. Debe ser inferior a la diferencia del control con placebo



$$M1 < (C-P)/2$$

M1 garantiza que se muestra un efecto superior a 0.

# Fidaxomicina vs Vancomicina



$$81,3\% - 46,6\% = 34,7\% \text{ (25,81; 43,64\%)}$$

$$< 25,81 : 2 = 12,40\%$$

The -10% non-inferiority margin is justified based on data from a review article by Weiss [Weiss, 2009]. The clinical success rates based on the results of tolevamer (a surrogate for placebo) and vancomycin in two well controlled Phase 3 trials showed point estimates of the risk difference of 34.7% (95% CI 25.81, 43.64) and 38.6% (95% CI 29.55, 47.73) (Table 16). Preserving 50% of the treatment difference provides a non-inferiority margin of 12.9% and 14.8%, respectively. Based on this information, a non-inferiority limit of -10% is justified.

**Table 16. Non-Inferiority Margin Based on Data from Weiss, 2009**

Study	Cure Rates n/N (%)		Risk Difference (%) [95% CI]
	Tolevamer	Vancomycin	
Study 301	124/266 (46.6)	109/134 (81.3)	34.7 [25.81, 43.64]
Study 302	113/268 (42.2)	101/125 (80.8)	38.6 [29.55, 47.73]

CDER



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18th European Congress of Clinical Microbiology and Infectious Diseases  
Abstractverwaltung Congrex

http://registration.akm.ch/einsicht.php?XNABSTRACT\_ID=61851&XNSPRACHE\_ID=2&XNKONGRESS\_ID=73&XNMASKEN\_ID=900

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**18th European Congress of Clinical Microbiology and Infectious Diseases (ECCMID)**  
19.04.2008 - 22.04.2008

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Home - 22.04.2008 - Clostridium difficile – Changing epidemiology and treatment options

**Clostridium difficile – Changing epidemiology and treatment options**

Tuesday, April 22, 2008, 10:12 - 10:24

**Results of a phase III trial comparing tolevamer, vancomycin and metronidazole in patients with Clostridium difficile-associated diarrhoea**

E. Bouza, M. Dryden, R. Mohammed, J. Peppe, S. Chasan-Taber, J. Donovan, D. Davidson, G. Short for the Polymer Alternative for CDAD Treatment (PACT) Investigators

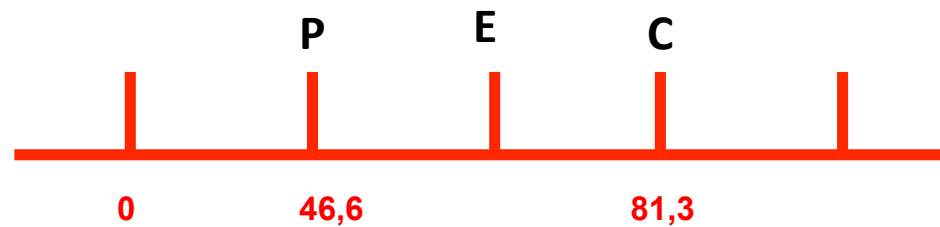
Objectives: Clostridium difficile-associated diarrhoea (CDAD) is an increasing nosocomial problem. Treatment with vancomycin (V) or metronidazole (M) is associated with incomplete response rates, frequent recurrences, and selection for resistant bacteria. In this study, the safety and efficacy of tolevamer (T) liquid (Genzyme, Cambridge MA), a novel non-antibiotic toxin binder, was compared to V and M.

Methods: In this double-blind, multicenter (Europe, Australia, Canada) study in adult patients with acute CDAD appropriate for oral therapy, patients were randomized (2:1:1) to T 9g (3g tid, 14 days), V 500 mg (125mg qid, 10 days), or M 1500mg (375 mg qid, 10 days). In the T group, an initial 9 g loading dose was given. Patients were followed for recurrence 4 weeks after treatment cessation. The primary endpoint was non-inferiority of T vs. V for clinical success, defined as resolution of diarrhea and absence of severe abdominal discomfort due to CDAD on Day 10.

Results: 528 patients (268 T, 125 V and 135 M) comprised the intent-to-treat population. At enrollment, CDAD was noted as mild (31%), moderate (43%), or severe (25%), first occurrence (83%) or recurrent (17%), and was similar across the treatment groups. Clinical success rates were 42% (112/268) T, 81% (101/125) V, and 73 % (99/135) M, indicating similar success rates in the V and M groups ( $p=0.153$ ), but a lower T success rate than V or M ( $p<0.001$  for both comparators). In patients with CDAD resolution sustained through the end of active treatment, the recurrence rates were 6% for T, 18% for V, and 19% for M. Adverse events were similar across treatment arms.

Conclusion: T did not meet its primary endpoint of non-inferiority vs. V. Overall, V and M had similar responses. Recurrent CDAD occurred frequently with V and M, but was uncommon among those patients who resolved with T, suggesting that flora-sparing drugs may help reduce recurrences. These results confirm those from an identically designed parallel study performed in the US and Canada (ICAAC 2007; poster 3826).

# Fidaxomicina vs Vancomicina



$$81,3\% - 46,6\% = 34,7\% \text{ (25,81; 43,64\%)} \\ < 25,8:2 = 12,9\%$$

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### 3. La inferioridad debe ser clínicamente aceptable M2

## Diferencia del efecto respecto al control:

Diferencia absoluta: infecciosas

Fracción de la reducción riesgo: cardiovascular

#### 7. *Statistical Considerations*

The choice of delta for noninferiority testing should be discussed with the Division prior to study initiation because one delta is not appropriate for all study designs. In the past, many noninferiority studies have been powered based on a delta of 10 percent to 12 percent. In most cases, this allowed sponsors to plan studies that would be reasonably powered and feasible to conduct. Such a delta has been useful when comparing the most potent component of a three-drug regimen in treatment naïve individuals. However, the sponsor should ultimately attempt to choose a delta based on prior knowledge of the quantitative contribution of the active control (substituted part of the drug regimen) to the regimen as a whole. This contribution should be determined in a similar population with a similar length of follow-up of the proposed study. For noninferiority testing, sponsors should employ two-sided 95 percent confidence intervals adjusted for multiple comparisons. If one-sided confidence intervals are used, the alpha should be 0.025.

US Department of Health and Human Services, Food and Drug Administration and Center for Drug Evaluation and Research. Guidance for industry: antiretroviral drugs using plasma HIV RNA measurements -- clinical considerations for accelerated and traditional approval. <http://www.fda.gov/CDER/GUIDANCE/3647fnl.pdf> (accessed May 1, 2008).



# Fidaxomicina vs Vancomicina

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http://www.accessdata.fda.gov/drugsatfda\_docs/nda/2011/201699Orig1s000SumR.pdf

http://www.accessdata.fda.gov/drugsatfda\_docs/nda/2011/201699Orig1s000SumR.pdf Google

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## 6.0 Summary of Clinical Efficacy


Optimer submitted two identically designed Phase 3 trials that were randomized (1:1), double-blind, multicenter, active-controlled, noninferiority trials in CDAD patients. Study 003 enrolled subjects in the US and Canada, while study 004 enrolled subjects in Canada, the US, and Europe. Both trials compared 10 days of fidaxomicin 200 mg po bid to 10 days of vancomycin 125 mg po qid in subjects with CDAD. Randomization was stratified by prior CDAD episode with two strata: 1) no prior episode in the last 3 months or 2) a single prior episode in the last 3 months. Note that the applicant for the purposes of the study protocol (b) (4) has used the term C diff infection (CDI), however this implies the infection could be extra-intestinal, which is not what was studied. Historically, the Agency has used CDAD, as noted in the Vancocin capsule label, as well as in the Warnings section of other antibacterial product labeling. Therefore, the review team has agreed that CDAD should be used instead of CDI.

The applicant has provided justification for a 10% noninferiority margin for clinical cure at the end-of-treatment (EOT) visit. The statistical reviewer, with some modifications to the historical information used to evaluate the historical evidence of treatment effect, has concurred that a 10% NI margin can be justified for this endpoint.

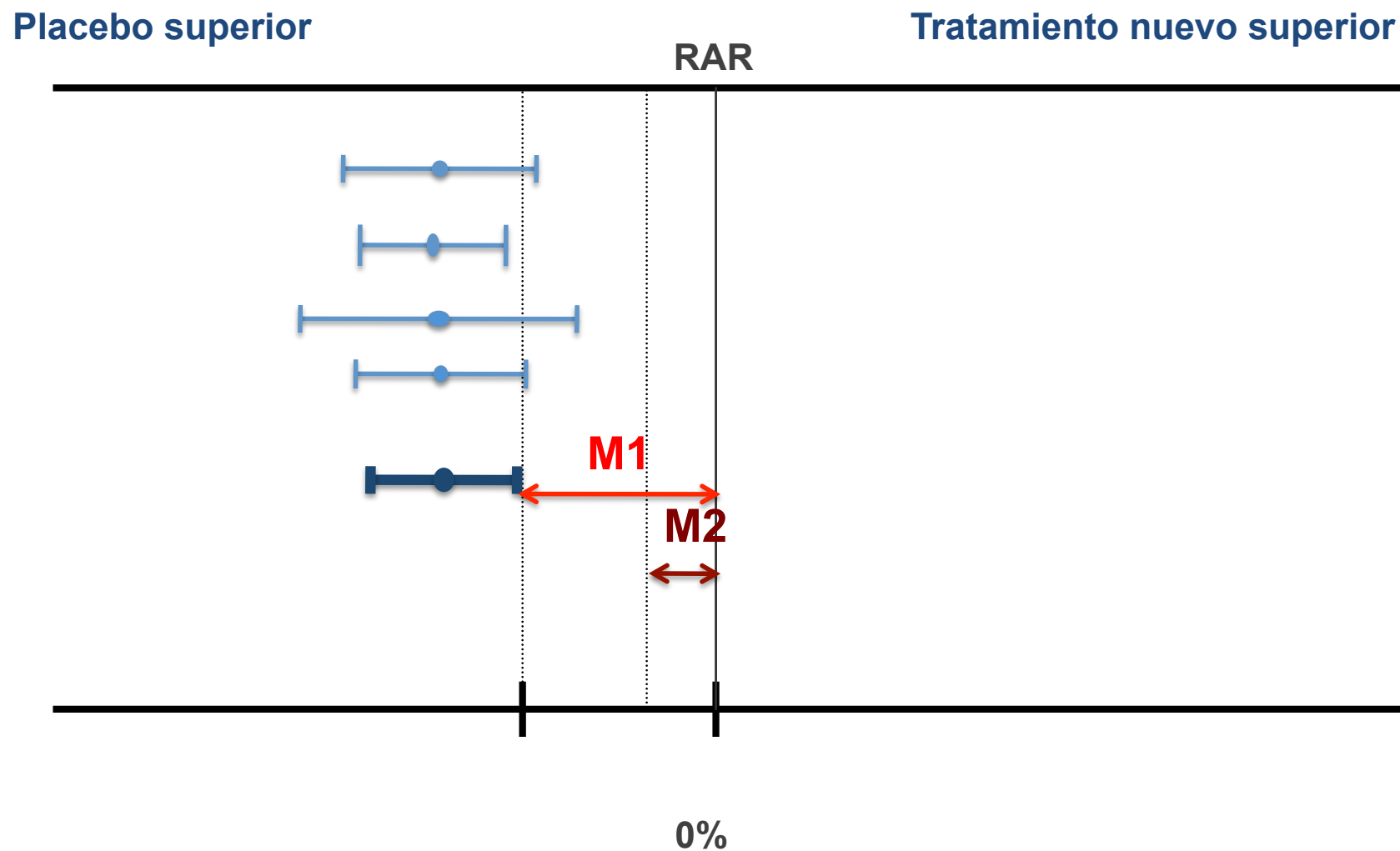
As discussed above, the primary outcome was clinical cure at the EOT visit (Day 10-11) and was defined as subjects who required no further treatment for CDAD, had a frequency of unformed stools of 3 or fewer for two consecutive days, who had a marked reduction in the number of unformed bowel movements and who had residual mild abdominal discomfort, or in subjects who had a rectal collection device, had a decrease in the volume of diarrhea of 75%. Clinical failures were subjects who required additional CDAD therapy. The primary analysis population was the modified intent-to-treat (mITT) which included the group of randomized subjects with CDAD confirmed by > 3 unformed bowel movements in the 24 hours prior to randomization and a positive toxin assay who received at least one dose of study medication.

During the review of CRFs, the medical officer noted some subjects who were declared cures by the applicant who were not felt to be cures because they had

Regulatory Information



# Comparación gráfica de tipos de estudios



# Valores utilizados

FDA 1992 Comité Asesor Cardio Renal: recomendó la mitad del efecto del tratamiento estándar como margen de no inferioridad para nuevos **trombolíticos**

FDA Oct 2002: Guidance for Industry **Antirretrovirales**:

10-12% (RAR) del % pacientes con carga viral indetectable

FDA: **Antiinfecciosos**, delta modulable según la tasa de respuesta

Referencia	Fármacos	Indicación	Margen
Babinchak T. CID 2005;41(suppl 5):S354-67.	TIG 50mg/12h IMI 500mg/6h	Infección intraabdominal	15%
CID 2005; 41: S341-353.	TIG 50mg/12h VAN 1g+AZTREONAM 2g/12h	PPBc	15%
Arbeit. CID 2004;38:1673-81.	Daptomicina 4mg/Kg/d VAN,OXA;CLOX;NAFCI;FLUCL OX (+AZT;+METRO)	PPBc	10%
Jauregui LE. CID 2005;41:1407-15	Dalbavancin vs Linezolid	PPBc	12,5%
Fowler. N Engl J Med 2006;355;7: 653-665.	Daptomicina 6mg/Kg/d Penicilina anti-Sth o VANCO	Bacteriemia <i>St.aureus</i> Endocarditis <i>St.aureus</i>	20%

## 2.3 Clinical efficacy

- Ceftaroline has been shown to be as effective as (non-inferior to) standard comparator treatments in clinical trials.

cSSSI 10%

CSSTI MITT population

Trial	Ceftaroline	Vancomycin/ Aztreonam	Difference (95% CI)
CANVAS 1 <sup>1</sup>	86.6% (304/351)	85.6% (297/347)	1.0 (-4.2, 6.2)
CANVAS 2 <sup>2</sup>	85.1% (291/342)	85.5% (289/338)	-0.4 (-5.8, 5.0)
CANVAS 1 & 2 <sup>3</sup>	85.9% (595/693)	85.5% (586/685)	-0.3 (-3.4, 4.0)

MITT – Modified Intention to Treat

<sup>1</sup>Corey RG et al. Abs & Poster L-1515a. 48th ICAAC / 46th ISDA 2008.

<sup>2</sup>Baculik T et al. Abs & Poster #P-1732. ECCMID 2009.

<sup>3</sup>Corey RG et al. Clinical Infectious Diseases 2010; 51 (6): 641-650

CABP 10%

CAP MITTE population

Trial	Ceftaroline	Ceftriaxone 1g	Difference (95% CI)
FOCUS 1	83.8% (244/291)	77.7% (233/300)	6.2 (-0.2, 12.6)
FOCUS 2	81.3% (235/289)	75.5% (206/273)	5.9 (-1.0, 12.7)
FOCUS 1 & 2	82.6% (479/580)	76.6% (439/573)	6.0 (1.4, 10.7)

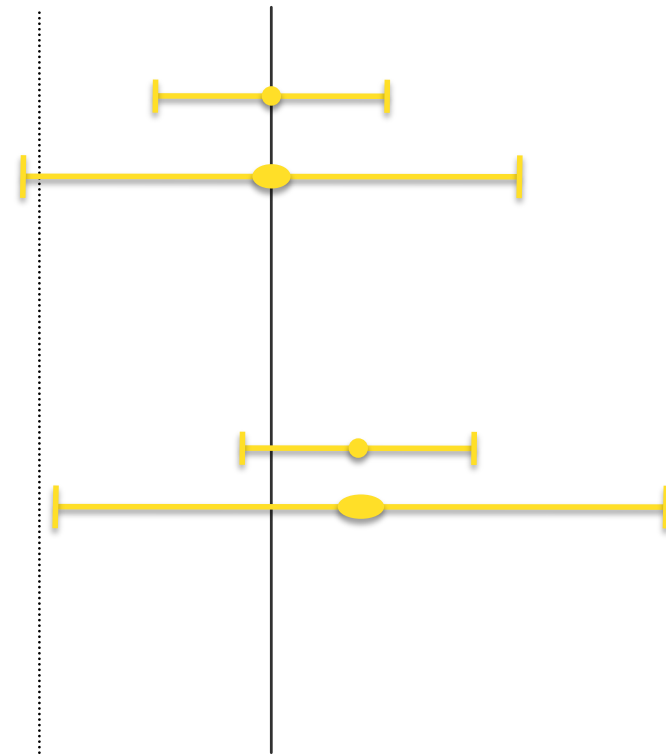
MITT – Modified Intention to Treat Evaluable

File TM et al. Clinical Infectious Diseases 2010; 51 (12): 1395-1405





## Intervalo confianza



El valor medio de una medida no es el real

Todos los valores que engloba el IC95% de la diferencia deben estar POR ENTERO, dentro del límite de no-inferioridad.

**Table 2. Clinical cure rates at test of cure.**

Patient subgroup	Proportion of patients (%)		95% CI
	Moxifloxacin arm	Comparator arm	
Intent-to-treat population	293/368 (79.6)	306/365 (83.8)	−9.7 to 1.4
Per-protocol population, by PSI			
All	253/291 (86.9)	250/278 (89.9)	−8.1 to 2.2
PSI III	110/122 (90.2)	105/111 (94.6)	−11.6 to 1.9
PSI IV	120/138 (87.0)	120/134 (89.6)	−9.3 to 5.6
PSI V	23/31 (74.2)	25/33 (75.8)	−23.2 to 21.1
PSI IV/V	143/169 (84.6)	145/167 (86.8)	−9.0 to 5.8
Patients with microbiologically documented CAP			
All	114/127 (89.8)	110/123 (89.4)	−6.2 to 8.3
Pneumonia due to atypical organisms <sup>a</sup>	39/41 (95.1)	41/45 (91.1)	−8.3 to 14.1
Pneumococcal pneumonia <sup>b</sup>	69/77 (89.6)	74/85 (87.1)	−9.1 to 10.1
Patients with microbiologically valid CAP			
All	45/54 (83.3)	46/54 (85.2)	−15.4 to 11.8
<i>Streptococcus pneumoniae</i> -positive culture <sup>c</sup>	27/32 (84.4)	38/45 (84.4)	−20.0 to 12.0
Bacteremia (due to any organism)	15/20 (75.0)	18/24 (75.0)	−40.3 to 24.8



# Análisis de los resultados

Superioridad: **Análisis intención tratar o según aleatorización:**

- Las pérdidas no se deben al azar

- Garantizar la comparación de los grupos

- Dificulta las diferencias

No-inferioridad: **Análisis por protocolo o de casos válidos:**

- Aumentan las diferencias

- Dificulta la conclusión de que son iguales

Ambos y detectar causas de las diferencias si las hay

# Problemas de los ensayos No-inferioridad

## 1. Falta de HESDE (Historical evidence of sensitivity to drug effects) (ICH E-10)

HESDE cannot be determined for many symptomatic treatments, where well-designed and conducted studies often fail to distinguish drug from placebo (e.g., treatments for depression, anxiety, insomnia, angina, symptomatic heart failure, symptoms of irritable bowel disease, and pain). In those cases, there is no reason to assume that an active control would have shown superiority to a placebo (had there been one) in any given NI study, and NI studies of drugs for these treatments are not informative. This is also true for some outcome effectiveness findings, such as secondary prevention of cardiovascular disease with aspirin and post-infarction beta blockade. In the case of aspirin, the largest placebo-controlled trial (AMIS, the Aspirin Myocardial Infarction Study; see Example 3) showed no effect of aspirin at all, even though other trials all favored aspirin. Similarly, of more than 30 post-infarction beta-blocker trials, only a small number showed significantly improved survival or other cardiovascular benefit.

# Problemas de los ensayos No-inferioridad

## 2. Asunción de la constancia del efecto

Bioscreep

Bioscreep en antiinfecciosos

Technoscreep

# Riesgos de asumir la eficacia histórica

## Población, criterios inclusión, tratamientos previos

- Mortalidad post-IAM por betabloqueantes está modificada por nuevos tratamientos (hipolipemiente, antiplaquetarios) o procedimientos (angioplastia)
- Efectos IECAs en ICC está modificado por uso rutinario de betabloqueantes o antagonistas aldosterona.
- Trombolítico por el momento en el que se hace

Temple RJ. FDA Experience and Perspective on Non-Inferiority Trials. FDA Workshop on CAP. January 18, 2008.

En ausencia de placebo, no se sabe si el nuevo fármaco tiene eficacia en absoluto.

## Resultados de eficacia clara:

Heparina TVP

UTI

Leucemia aguda, Ca testicular

Betaagonistas broncoespasmo

Profilaxis asma con corticoides

Trombolíticos IAM

Para la mayoría de los tratamientos sintomáticos, no se ha visto efecto en EECCs:

Ansiedad      Síntomas ICC

Depresión      Angina

Insomnio      GERD reflujo gastroesofágico

Rinitis alérgica      Síndrome intestino irritable

Profilaxis asma      Dolor



# Problemas de los ensayos No-inferioridad

## 3. Falta de sensibilidad



ARCHIVES OF  
**OTOLARYNGOLOGY—**  
**HEAD & NECK SURGERY**

Volume 124(8)

August 1998

pp 879-885

**Homeopathic vs Conventional Treatment of Vertigo:  
A Randomized Double-blind Controlled Clinical Study**

Weiser, Michael MBChB; Strosser, Wolfgang MD, MBChB; Klein, Peter MSc

# Nuevas aproximaciones

Diseños adaptativos

Objetivo

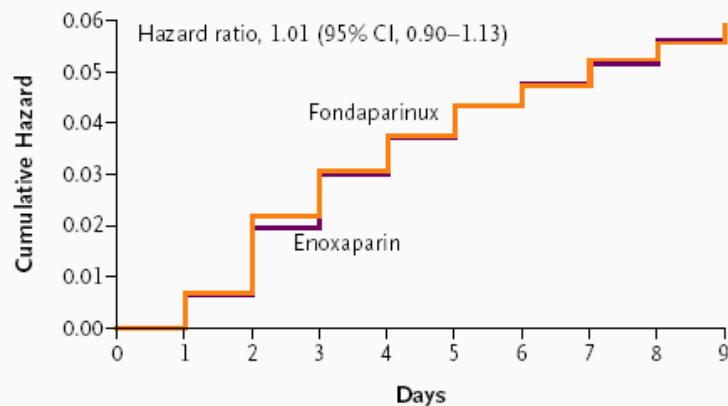
Tamaño muestral

M2 flexibles

Diseños combinados

## Ensayos, objetivos, variables mixtas

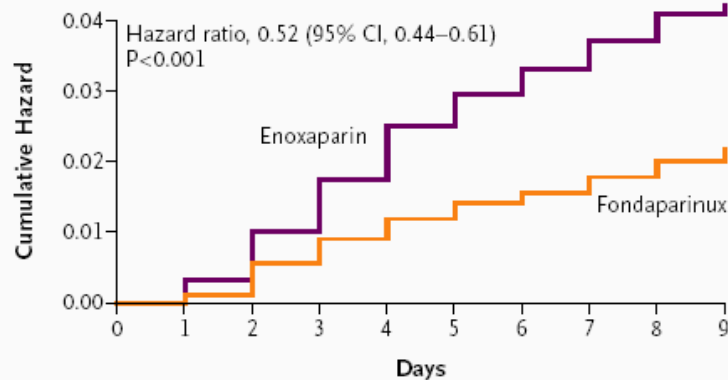
**A** Death, Myocardial Infarction, or Refractory Ischemia through Day 9



**No. at Risk**

Enoxaparin	10,021	9954	9824	9724	9652	9593	9550	9515	9470
Fondaparinux	10,057	9986	9836	9752	9684	9628	9589	9541	9510

**B** Major Bleeding through Day 9



**No. at Risk**

Enoxaparin	10,021	9979	9871	9774	9682	9625	9575	9527	9478
Fondaparinux	10,057	10,028	9951	9884	9838	9796	9773	9738	9709

## Comparison of Fondaparinux and Enoxaparin in Acute Coronary Syndromes

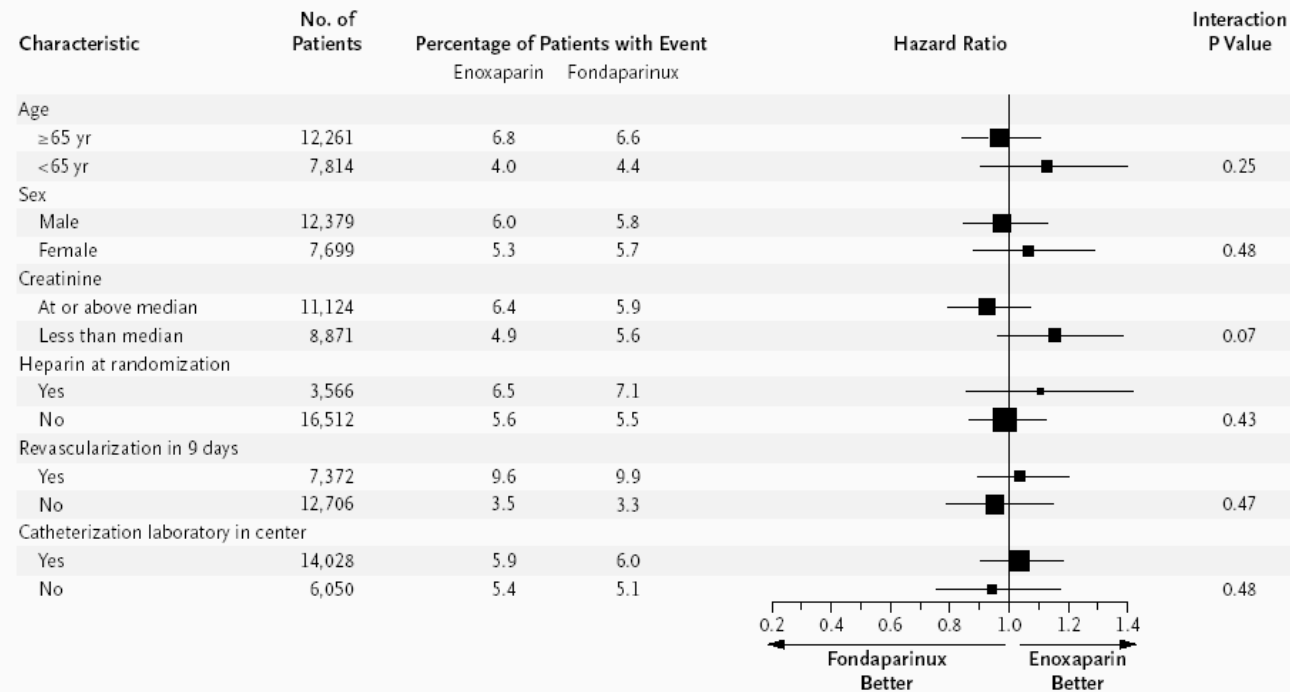
The Fifth Organization to Assess Strategies in Acute Ischemic Syndromes Investigators\*

**Eficacia:**  
**5,8 frente 5,7**

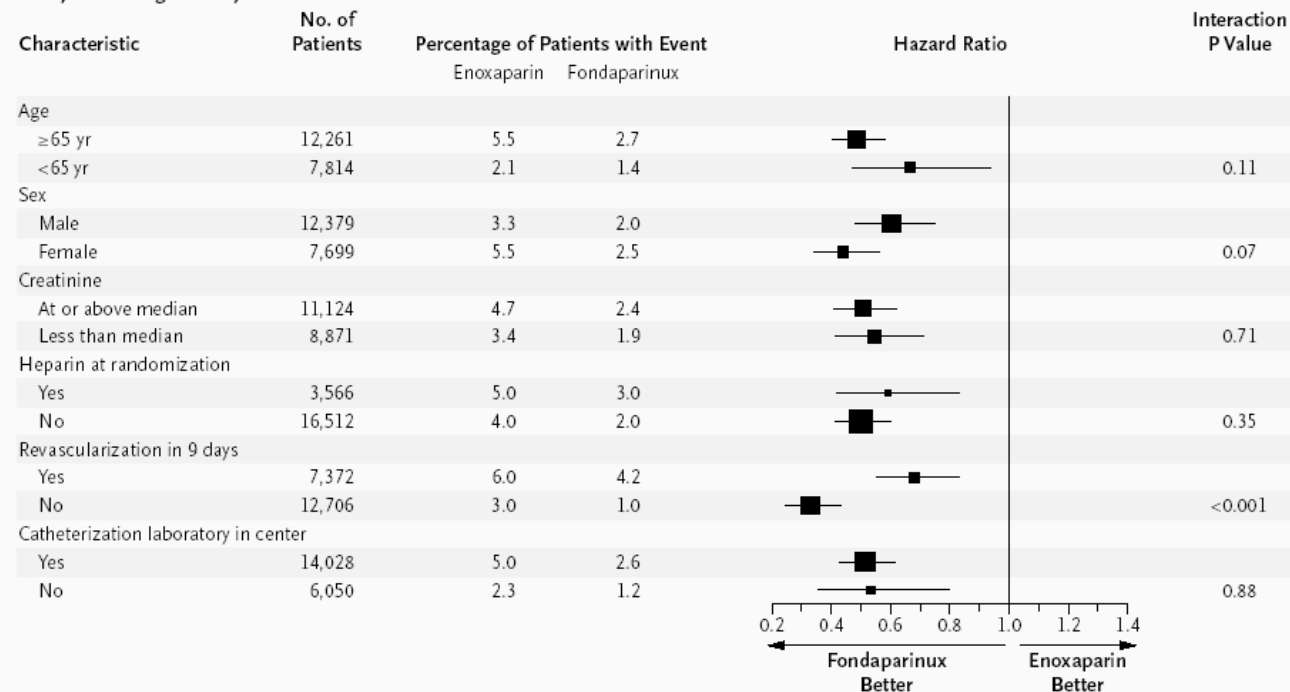
**Hazard Ratio 1,01 (0.90-1.13)**

**Seguridad: 2,2% frente 4,1%**  
**Hazard Ratio 0,52 (0,44 a 0,61)**

### A Primary Efficacy at 9 Days



### B Major Bleeding at 9 Days



Los estudio de NI se han constituido como ensayos de referencia:

- Pueden mostrar superioridad
- Tienen connotación clínica



The European Agency for the Evaluation of Medicinal Products  
*Evaluation of Medicines for Human Use*

London, 27 July 2000  
CPMP/EWP/482/99

**COMMITTEE FOR PROPRIETARY MEDICINAL PRODUCTS  
(CPMP)**

**POINTS TO CONSIDER ON SWITCHING BETWEEN SUPERIORITY  
AND NON-INFERIORITY**

#### STATISTICAL ANALYSIS

The primary efficacy analysis was based on the intention-to-treat approach, with the use of data from all patients who underwent randomization. First, the noninferiority of posaconazole as compared with fluconazole or itraconazole therapy was assessed. For our study, the incidence of proven or probable invasive fungal infection was assumed to be 8% or less with fluconazole or itraconazole prophylaxis.<sup>1</sup> Therefore, using a cutoff level of significance of 4.87% for the final analysis (in order to account for the interim analysis), we calculated that if the upper bound of the 95.13% confidence interval (hereafter called the 95% CI) for the difference between the incidence of proven or probable fungal infection for posaconazole and that for fluconazole or itraconazole was less than 4%, noninferiority would be demonstrated, and the superiority of posaconazole over fluconazole or itraconazole therapy could be assessed. The superiority of posaconazole would be established if the upper bound of the same 95% CI was negative. This two-step analysis allowed for an overall type 1 error rate of 0.05. We used the Kaplan–Meier method to evaluate time to death from any cause, time to death related to fungal infection, time to proven or probable fungal infection, time to first use of empirical antifungal therapy, and survival free from proven or probable invasive fungal infection. The survival benefit was assessed with the chi-square and log-rank tests. All analyses except the noninferiority analysis were based on two-sided P values, with a two-sided P value of less than 0.05 considered to indicate statistical significance. The numbers of patients who would need to be treated to prevent one fungal infection and one death (numbers needed to treat) were calculated as described pre-

Proven or probable invasive fungal infections occurred during the treatment phase in 7 of the 304 patients (2%) in the posaconazole group and in 25 of the 298 patients (8%) in the fluconazole or itraconazole group (absolute reduction in the posaconazole group, –6%; 95% CI, –9.7 to –2.5;  $P<0.001$ ). The superiority of posaconazole over fluconazole was confirmed in a post hoc analysis limited to centers at which fluconazole was used as the comparison study drug (see the Supplementary Appendix, available with the full text of this article at [www.nejm.org](http://www.nejm.org)). We estimated that 16 patients would need to be treated with posaconazole, as compared with fluconazole or itraconazole, in order to prevent one invasive fungal infection.

During the 100-day period after randomization, 14 of 304 patients (5%) in the posaconazole group had a proven or probable fungal infection, as compared with 33 of 298 patients (11%) in the fluconazole or itraconazole group ( $P=0.003$ ). The mean ( $\pm$ SD) time to invasive fungal infection was  $41\pm26$  days in the posaconazole group and  $25\pm26$  days in the fluconazole or itraconazole group. Kaplan–Meier analysis of the time to invasive fungal infection showed a significant difference in favor of posaconazole ( $P=0.003$ ) (Fig. 1A). Table 2 lists the causative pathogens of invasive fungal infections that occurred during the treatment phase; aspergillus was the most common. There were significantly fewer cases of aspergillosis associated with posaconazole prophylaxis than with fluconazole or itraconazole prophylaxis (2 [1%] vs. 20 [7%],  $P<0.001$ ).

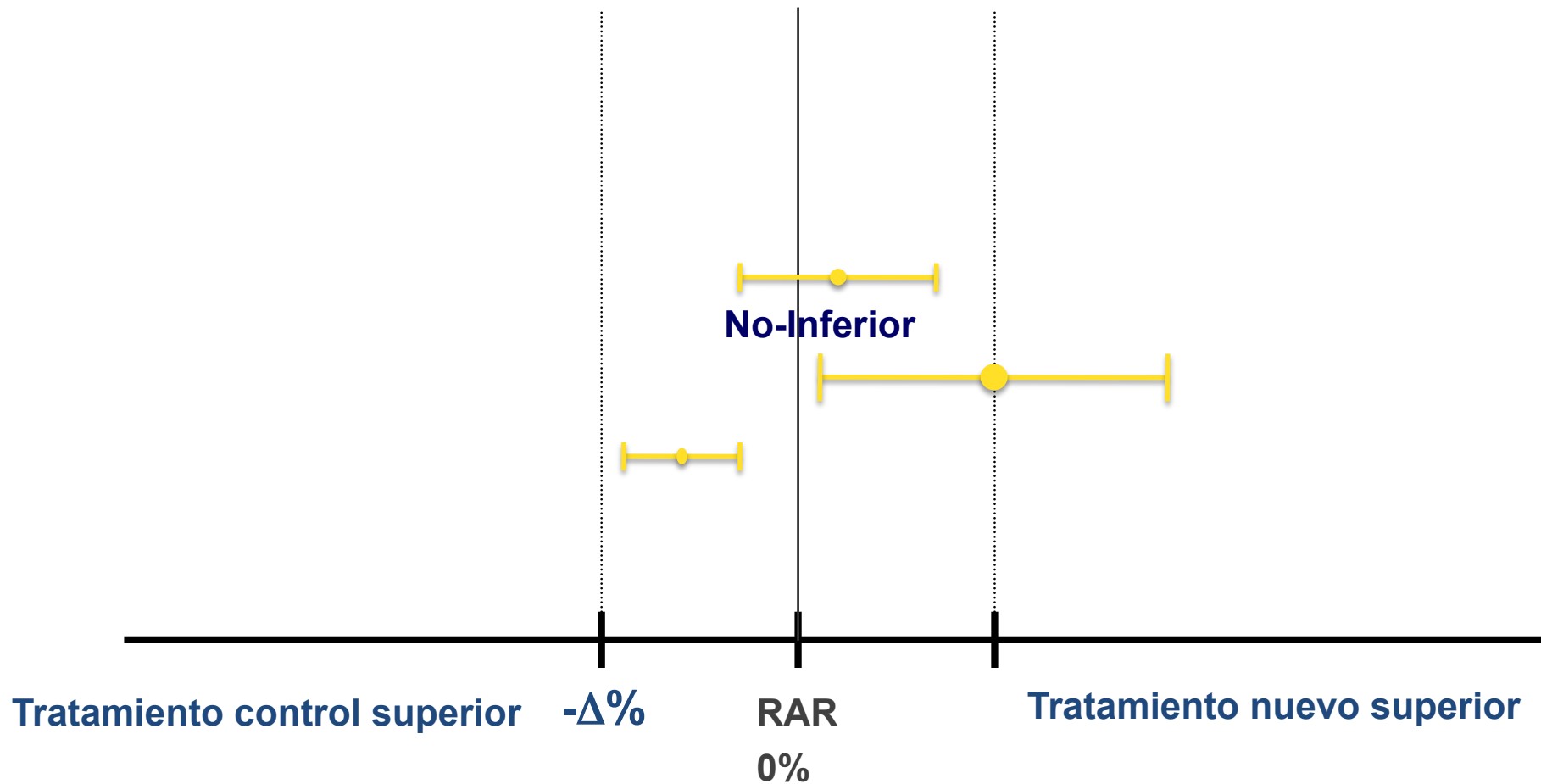
#### CLINICAL SUCCESS OR FAILURE

Rates of clinical success or failure and the reasons for clinical failure are listed in Table 3. Of the 304 patients in the posaconazole group, 81 (27%)

# Cambio de objetivo

No-inferioridad  Superioridad

Análisis de los datos AIT y PP





# Calidad

## Reporting of Noninferiority and Equivalence Randomized Trials An Extension of the CONSORT Statement

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for the CONSORT Group

THE CONSOLIDATED STANDARDS of Reporting Trials (CONSORT) statement was developed to alleviate the problem of inadequate reporting of randomized controlled trials (RCTs),<sup>1-4</sup> which has been associated with biased treatment effects.<sup>3,7</sup> The statement comprises evidence-based recommendations for reporting RCTs, including a flowchart of participants through the trial.

CONSORT's primary focus is on parallel group trials,<sup>1-3</sup> aiming to identify treatment superiority if it really exists. Most CONSORT recommendations apply equally well to other trial designs, but some need adaptation. Herein we extend the CONSORT recommendations to noninferiority and equivalence trials. First, we explain the rationale for and key methodological features of such trials. Second, we consider how commonly noninferiority and equivalence trials are published and provide empirical evidence about their quality. Last, we present an adapted CONSORT checklist for reporting non-

The CONSORT (Consolidated Standards of Reporting Trials) statement, including a checklist and a flow diagram, was developed to improve their reporting of randomized controlled trials on individually randomized trials with 2 parallel groups. It is applicable to trials of noninferiority or equivalence, as well as to trials of superiority. The statement includes methodological features that differ from superior trials, such as the rationale for such trials occurs frequently, those specifically as noninferiority or equivalence trials. The quality of reporting of these trials is often inadequate. In this article, we present an adapted checklist for reporting noninferiority and equivalence trials, with illustrative examples and explanations for those items on the CONSORT checklist. The intent is to improve reporting of equivalence trials, enabling readers to assess the validity of the conclusions.

JAMA. 2006;295:1152-1160

inferiority and equivalence trials and give illustrative examples (and further elaboration) for those items that have been amended.

For convenience, we will refer to *treatments* and *patients*, although we recognize that not all interventions evaluated in RCTs are technically treatments and the participants in trials are not always patients.

### Rationale for Noninferiority or Equivalence Designs

Most RCTs aim to determine whether one intervention is superior to another. By contrast, equivalence trials<sup>8</sup> aim to determine whether one (typi-

cally new) treatment is not inferior to an existing treatment. A noninferiority trial aims to determine whether one (typi-

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**Table.** Checklist of Items for Reporting Noninferiority or Equivalence Trials (Additions or Modifications to the CONSORT Checklist are Shown in Italics)

Paper Section and Topic	Item Number	Descriptor (Adapted for Noninferiority or Equivalence Trials)
Title and abstract	1*	How participants were allocated to interventions (eg, "random allocation," "randomized," or "randomly assigned"), specifying that the trial is a noninferiority or equivalence trial.
Introduction Background	2*	Scientific background and explanation of rationale, including the rationale for using a noninferiority or equivalence design.
Methods Participants	3*	Eligibility criteria for participants (detailing whether participants in the noninferiority or equivalence trial are similar to those in any trial(s) that established efficacy of the reference treatment) and the settings and locations where the data were collected.
Interventions	4*	Precise details of the interventions intended for each group, detailing whether the reference treatment in the noninferiority or equivalence trial is identical (or very similar) to that in any trial(s) that established efficacy, and how and when they were actually administered.
Objectives	5*	Specific objectives and hypotheses, including the hypothesis concerning noninferiority or equivalence.
Outcomes	6*	Clearly defined primary and secondary outcome measures, detailing whether the outcomes in the noninferiority or equivalence trial are identical (or very similar) to those in any trial(s) that established efficacy of the reference treatment and, when applicable, any methods used to enhance the quality of measurements (eg, multiple observations, training of assessors).
Sample size	7*	How sample size was determined, detailing whether it was calculated using a noninferiority or equivalence criterion and specifying the margin of equivalence with the rationale for its choice. When applicable, explanation of any interim analyses and stopping rules (and whether related to a noninferiority or equivalence hypothesis).
Randomization Sequence generation	8	Method used to generate the random allocation sequence, including details of any restriction (eg, blocking, stratification).
Allocation concealment	9	Method used to implement the random allocation sequence (eg, numbered containers or central telephone), clarifying whether the sequence was concealed until interventions were assigned.
Implementation	10	Who generated the allocation sequence, who enrolled participants, and who assigned participants to their groups.
Blinding (masking)	11	Whether or not participants, those administering the interventions, and those assessing the outcomes were blinded to group assignment. When relevant, how the success of blinding was evaluated.
Statistical methods	12*	Statistical methods used to compare groups for primary outcome(s), specifying whether a 1- or 2-sided confidence interval approach was used. Methods for additional analyses, such as subgroup analyses and adjusted analyses.
Results Participant flow	13	Flow of participants through each stage (a diagram is strongly recommended). Specifically, for each group report the numbers of participants randomly assigned, receiving intended treatment, completing the trial protocol, and analyzed for the primary outcome. Describe protocol deviations from trial as planned, together with reasons.
Recruitment	14	Dates defining the periods of recruitment and follow-up.
Baseline data	15	Baseline demographic and clinical characteristics of each group.
Numbers analyzed	16*	Number of participants (denominator) in each group included in each analysis and whether "intention-to-treat" and/or alternative analyses were conducted. State the results in absolute numbers when feasible (eg, 10/20, not 50%).
Outcomes and estimation	17*	For each primary and secondary outcome, a summary of results for each group and the estimated effect size and its precision (eg, 95% confidence interval). For the outcome(s) for which noninferiority or equivalence is hypothesized, a figure showing confidence intervals and margins of equivalence may be useful.
Ancillary analyses	18	Address multiplicity by reporting any other analyses performed, including subgroup analyses and adjusted analyses, indicating those prespecified and those exploratory.
Adverse events	19	All important adverse events or side effects in each intervention group.
Comment Interpretation	20*	Interpretation of the results, taking into account the noninferiority or equivalence hypothesis and any other trial hypotheses, sources of potential bias or imprecision and the dangers associated with multiplicity of analyses and outcomes.
Generalizability	21	Generalizability (external validity) of the trial findings.
Overall evidence	22	General interpretation of the results in the context of current evidence.

\*Expansion of corresponding item on CONSORT checklist.<sup>3,4</sup>



Edición Visualización Historial Favoritos Ventana Ayuda

Lack of FDA Guidance Impedes Anti-infective Drug Development

http://www.idsociety.org/newsArticle.aspx?id=5510

SEIMC PubMed Micromedex IDSA ABX-Guide Annals Pharm CID Google Calendar IDIS

- 2006 Annual Meeting Info on the Website
- CID, JID Now Offer CME for Peer Review
- HIVMA CID Compendium
- Clinical Practice
  - 2007 Clinical Practice Meeting
  - Leading by Example
- Medicare Electronic Funds Transfer
- New Fact Sheets
- Public Health & Science
  - ACIP Report
  - Adult Immunization Policy
  - Flu Vaccine Distribution
  - Mask and Respirator Use During a Flu Pandemic

**Waves of uncertainty** are rippling through the pharmaceutical industry following an apparent change in the Food and Drug Administration's (FDA) clinical trial requirements for anti-infectives.

Non-inferiority trials are no longer enough, as Oscient Pharmaceuticals and Replidyne discovered last fall—but not until after they conducted trials and applied for FDA approval. FDA's Antiinfective Drugs Advisory Committee (AIDAC) recommended against approval of Oscient Pharmaceutical's drug gemifloxacin (Factive) for the treatment of sinusitis in September. Shortly thereafter, FDA declined Replidyne's application to market faropenem medoxomil for the treatment of bronchitis.

Until recently, FDA has accepted non-inferiority trials as the standard for most antibiotic approvals. Now it appears the agency will accept only placebo-controlled trials to demonstrate safety of efficacy of antibiotics for some common indications. While these changes may be appropriate, FDA did a poor job communicating them to industry. As a result, pharmaceutical companies have unnecessarily invested resources and time into non-inferiority trials believing that they would be in compliance with FDA requirements.

**Promise Not Delivered**

For the past five years, IDSA has encouraged FDA to publish industry guidelines for the development of antibiotics to treat antimicrobial resistant pathogens, meningitis, acute sinusitis, acute otitis media, and acute exacerbation of chronic bronchitis. FDA staff has assured

**Gemifloxacin: sinusitis (nov 2007)**

**Faropenem: bronchitis**

Gato Cheshire, “*todos estamos locos*”.

- *Has de estarlo a la fuerza, de lo contrario  
no habrías venido aquí.*

Muchas gracias

