



# Biomarker Harmonization toward Histology Independent Drug Development: TMB Case Study

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# TMB Harmonization Project

## Background

- Tumor mutational burden (TMB), defined as the number of somatic mutations per megabase of interrogated genomic sequence
- Potential biomarker for the identification of cancer patients most likely to respond to immune checkpoint inhibitors.

## Clinical Cut-off Alignment

- As multiple sponsors work independently to optimize TMB measurement for their specific therapy, it is possible that each sponsor may set different cut points for a tissue agnostic TMB assessment
- This is especially problematic for tissue agnostic development because it is redefining the disease based on a biomarker rather than a site of origin or pathologic disease.

## Assay Harmonization

- Use of common samples to assess potential variation in measurement and reporting and a common reference standard to facilitate alignment



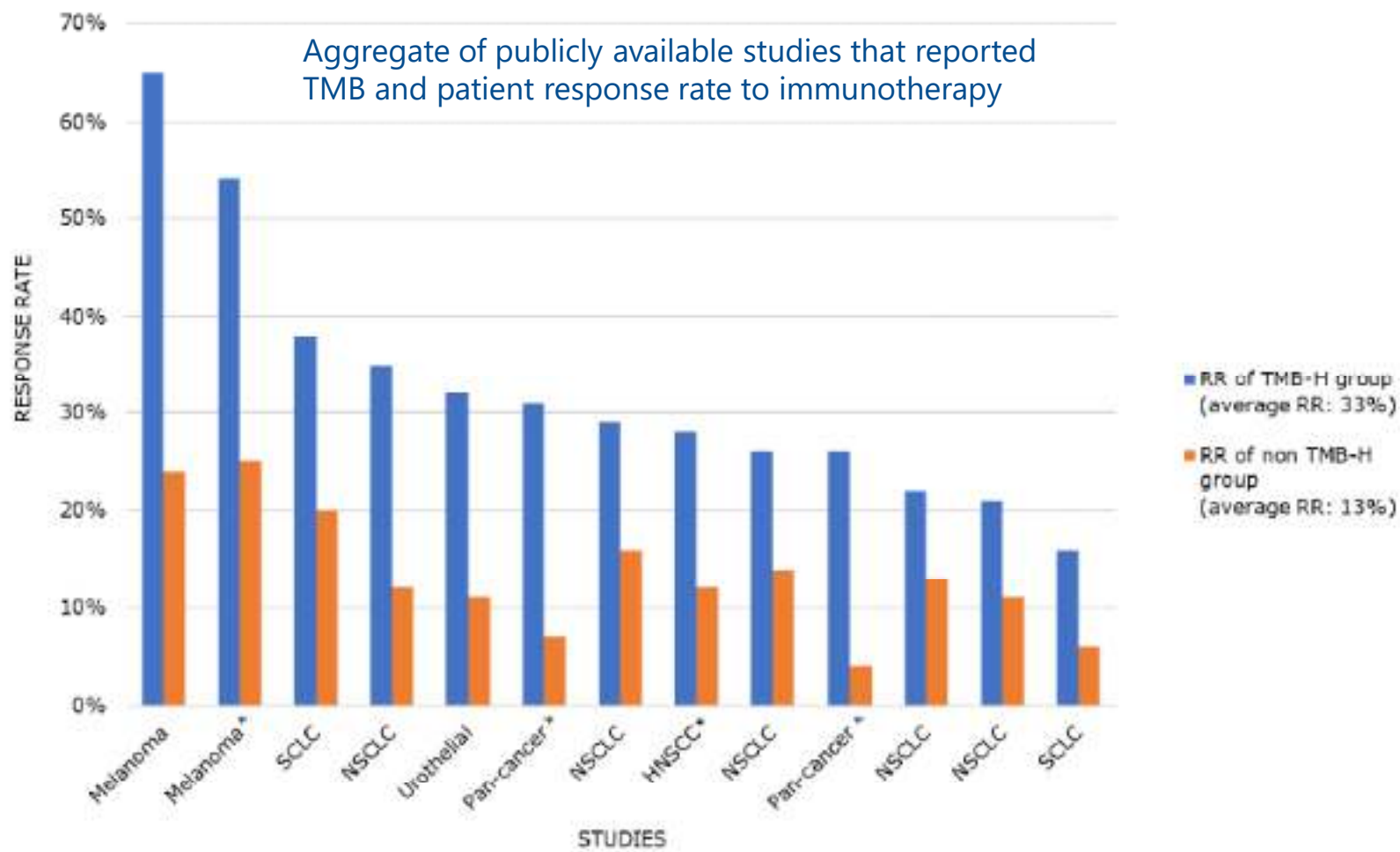


Figure 1: Response Rates for Published Studies Investigating Immunotherapies and Reporting TMB-based Response Rates. \* indicates studies that did not use TMB 10 mut/Mb as the study cut-off

# Pooled analysis of 1732 patient with different cancer types treated with ICI for which TMB had been measured

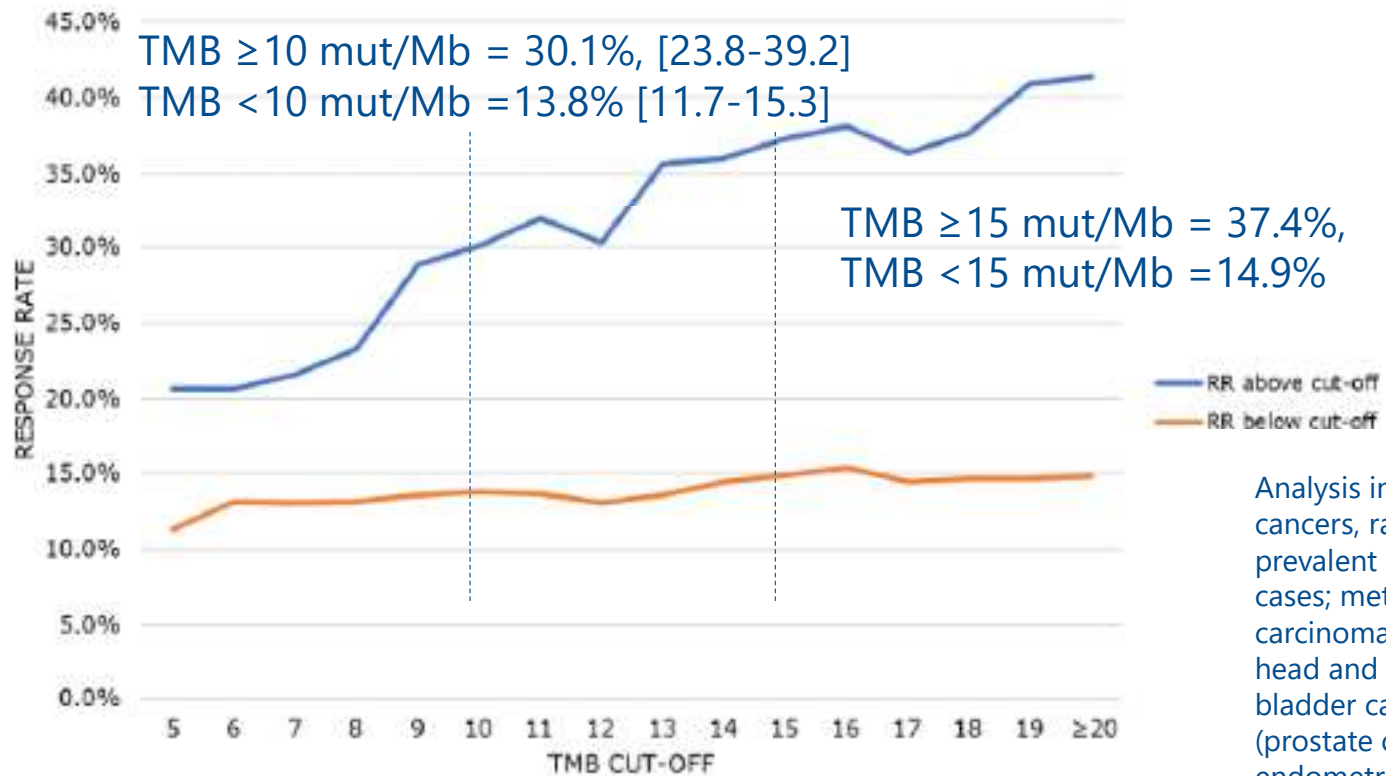


Figure 2. Average Response Rates for Patients Treated with IO Agents - Pooled Cohort

Analysis included 15 different cancers, ranging from the most prevalent (lung cancer, 29% of cases; metastatic urothelial carcinoma, 23%; cancer to the head and neck, 10%; and bladder cancer, 9%) to the least (prostate cancer, 1%; endometrial cancer, 1%; salivary gland cancer, 1%; and ovarian cancer, 0.35%)

# TMB Assay Alignment

- Friends TMB Harmonization Project: 15 labs and test developers establish research partnership to explore variability in measuring and reporting TMB
- In silico component (2018), cell line (2019) and clinical sample (2020) analyses
- Although different assays may differ in the way TMB is estimated, results from the Friends TMB Harmonization Project have shown that the empirical variability in TMB values ranging between 10-15 mut/Mb is not as large as what is observed at lower or higher TMB values

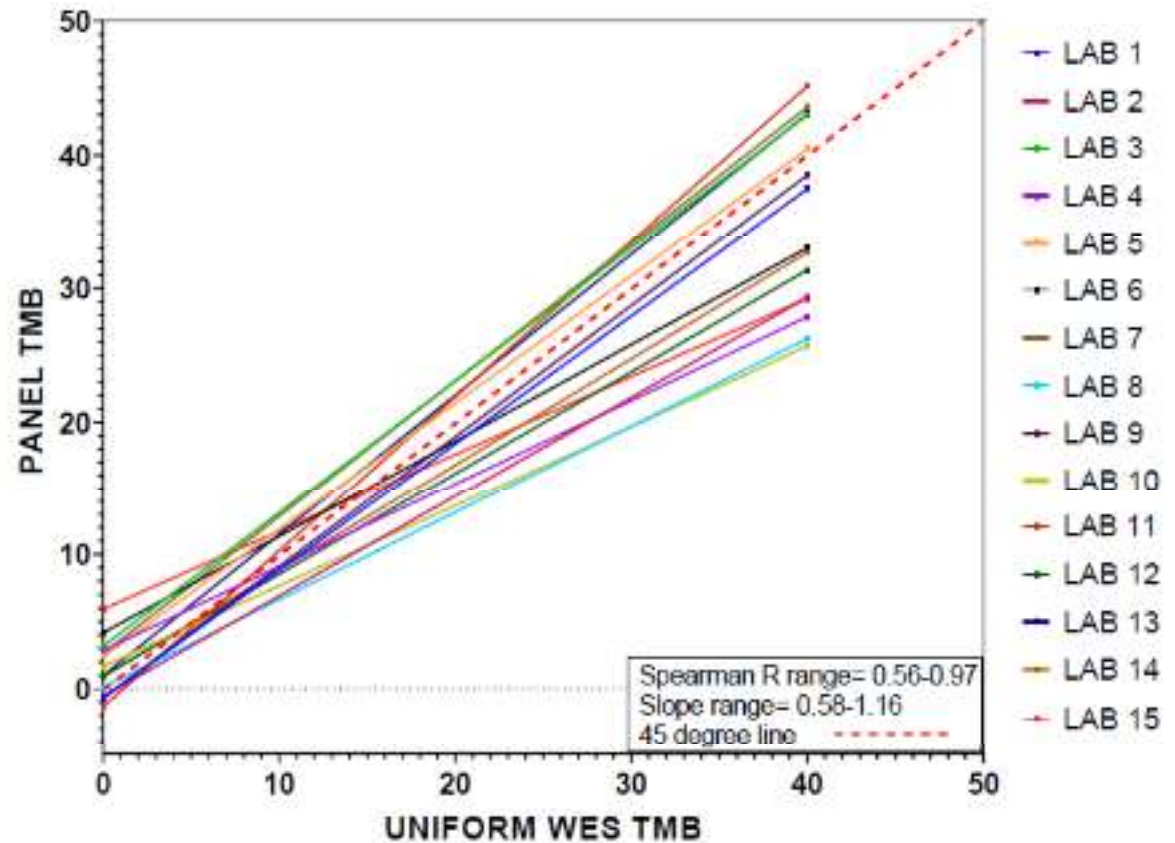
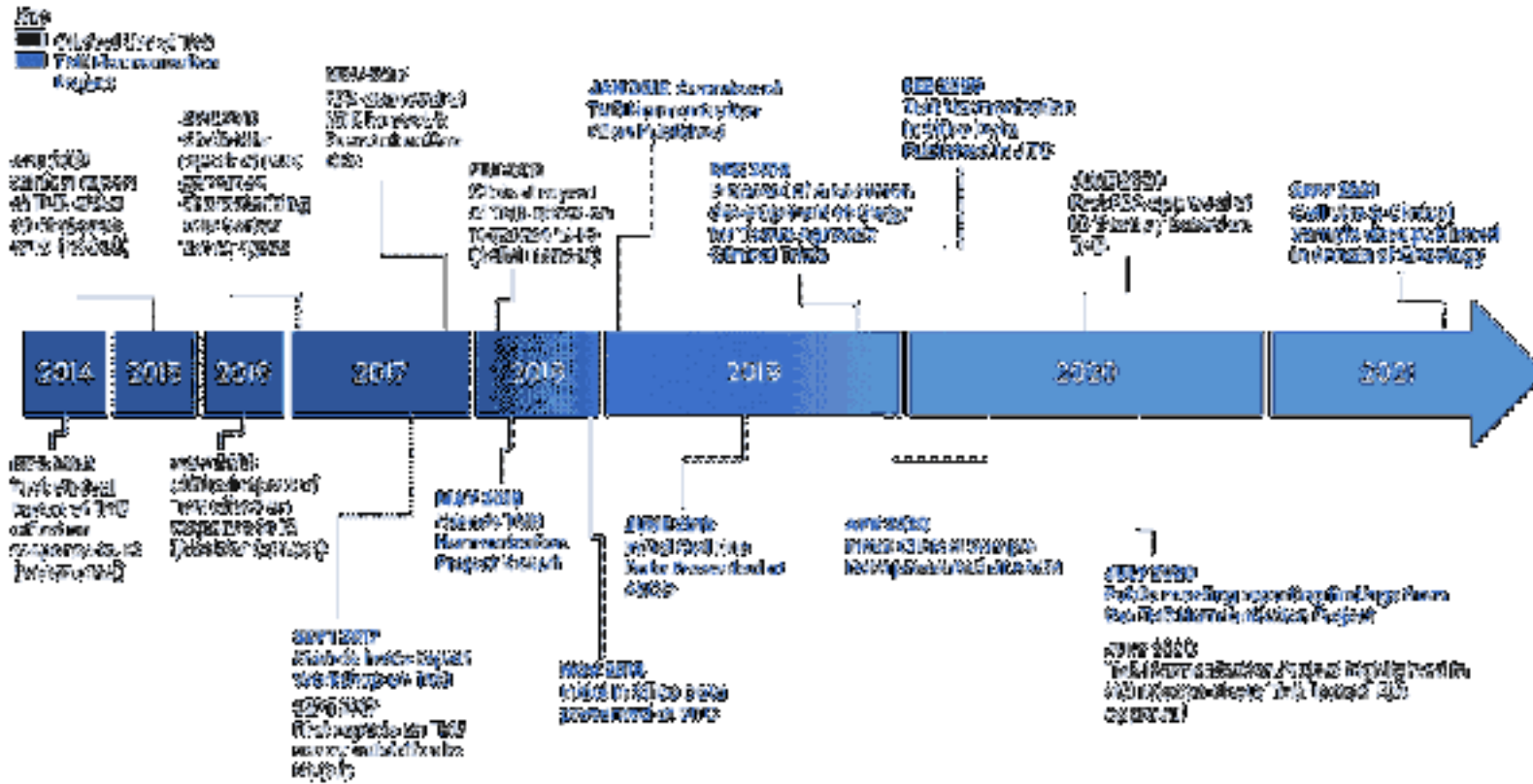


Figure 3. Association between WES-TMB and panel-TMB using human-derived matched tumor-normal cell lines. Results from the Friends of Cancer Research Harmonization Project- Phase 2A: Empirical Phase.

# TMB Harmonization Project Timeline





## Conclusions

- Tissue agnostic development may be a viable strategy for developing drugs that target specific molecular alterations across multiple cancers
- New regulatory guidance provides scientific considerations for determining if such an approach is appropriate and drug development processes
- To be successful several factors should be aligned in advance – e.g. scope of cancers included, determination of patient population, diagnostic performance

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# Tissue Agnostic Drug Development in Oncology Guidance for Industry

## *DRAFT GUIDANCE*

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

Comments and questions regarding this draft document should be submitted within 60 days of publication in the Federal Register or the notice announcing the availability of the draft guidance. Submit electronic comments to [www.regulations.gov](http://www.regulations.gov). Submit written comments to the Regulatory Management Staff (CDER-09), Food and Drug Administration, 5630 Fishers Lane, Ann Arbor, Michigan, MI 48162. All comments should be identified with the document number listed in the notice of availability and published in the Federal Register.

For questions regarding this draft document, contact (CDER) Steven Lerman 202-796-2766 or (CDER) Office of Communication, Outreach and Development, 301-854-4709 or 240-401-8010.

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## TMB Harmonization Project Partners

- ACT Genomics
- AstraZeneca
- Biodesix
- Brigham & Women's Hospital
- Bristol-Myers Squibb
- Caris Life Sciences
- College of American Pathologists
- Columbia University
- EMD Serono, Inc.
- European Organisation for Research and Treatment of Cancer (EORTC)
- Foundation Medicine, Inc.
- Genentech, Inc.
- Genomic Testing Cooperative
- Guardant Health, Inc.
- Hartwig Medical Foundation
- Illumina, Inc.
- Intermountain Precision Genomics
- Johns Hopkins University
- Massachusetts General Hospital
- MD Anderson Cancer Center
- Memorial Sloan Kettering Cancer Center
- Merck & Co., Inc.
- National Cancer Institute (NCI)
- National Institutes of Health (NIH)
- NeoGenomics Laboratories, Inc
- OmniSeq
- Personal Genome Diagnostics (PGDx)
- Pfizer, Inc.
- precisionFDA
- Q2 SOLUTIONS
- QIAGEN, Inc
- Quality in Pathology (QuIP)
- Quest Diagnostics
- Regeneron Pharmaceuticals
- Roche Diagnostics
- SeraCare
- Thermo Fisher Scientific
- Thrive
- University of Heidelberg
- U.S. Food and Drug Administration

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