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Drug Developme	ent Considerations for the Prevention of
Healthcare-Ass	sociated Infections
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1 APPEARANCES 2 Meeting Moderators: 3 John Farley, FDA 4 Michael Craig, CDC 5 Heidi Smith, FDA 1 PROCEEDINGS 2 DR. JOHN FARLEY: Good morning, 3 everyone and welcome to this virtual public worksho 4 Drug Development Considerations for the Prevention 5 Healthcare Associated Infections. My name is John	Page 4
2 Meeting Moderators: 3 John Farley, FDA 4 Michael Craig, CDC 5 Heidi Smith, FDA 2 DR. JOHN FARLEY: Good morning, 3 everyone and welcome to this virtual public worksho 4 Drug Development Considerations for the Prevention 5 Healthcare Associated Infections. My name is John	,
3 John Farley, FDA 4 Michael Craig, CDC 5 Heidi Smith, FDA 3 everyone and welcome to this virtual public worksho 4 Drug Development Considerations for the Prevention 5 Healthcare Associated Infections. My name is John	,
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5 Heidi Smith, FDA 5 Healthcare Associated Infections. My name is John	·•
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( T: 41 D	
6 Timothy Bensman 6 Farley and I am the director of the Office of	
7 Dan Rubin, FDA 7 Infectious Diseases in the Center for Drugs at FDA.	
8 John Jernigan, CDC  8 So innovation in drug development to	
9 Peter Kim, FDA 9 prevent healthcare-associated infections will be	
10 critical to reduce morbidity and mortality and address	
11 FDA: 11 antimicrobial resistance. Our colleagues at CDC and	
12 Edward Bein 12 the team at FDA have partnered to host this worksho	).
13 Timothy Bensma 13 This is one this is what we hope will be the first	
14 Paul Carlson 14 of a number of public dialogues to address drug	
15 Dmitri Iarikov 15 developmental development challenges in this space	e.
16 Caroline Jjingo 16 And special thanks to our CDC colleagues, the nation	al
17 Peter Kim 17 thought leaders, and industry development leaders the	.t
18 Theresa Michele 18 are able to join us today and are here. Next.	
19 Dan Rubin 19 So just an overview of today's program.	
20 Heidi Smith 20 Session one will focus on background and epidemiol	gy.
21 The team has put together a state of the art review of	
22 prevention science and the major healthcare-associate	d
Page 3	age 5
1 CDC: 1 infections, and I think we're all going to learn a lot	
2 Michael Craig 2 from that this morning. We have patients to provide	
3 Christopher Elkins 3 their perspective and impact statements and we have	ın
4 Alice Guh 4 opportunity for formal public comments.	
5 Cal Ham 5 We'll then turn our attention to the	
6 John Jernigan 6 regulatory perspective and trial design challenges and	
7 Lawrence Mcdonald 7 considerations and there are a number of regulatory	
8 Joe Sexton 8 considerations, first of which is that there really	
9 Maroya Walters 9 are a number of different products that are under	
10 discussion. So there are drugs, there are drugs that	
11 External: 11 are regulated as antiseptics, and there are	
12 Lilian Abbo (University of Miami) 12 microbiome-based therapeutics which are often	
13 A. Whitney Brown (Cystic Fibrosis Foundation) 13 biologics, and each of those has unique consideration	3
14 Silvia Caballero (Vedanta) 14 and we do have some speakers today to provide a goo	d
15 Erin Duffy (CARB-X) 15 overview of those issues.	
16 Vance Fowler (Duke University) 16 There are a lot of clinical,	
17 Nicholas Georges (Household and Commercial Products   17 statistical, and operational considerations to talk	
18 Association) 18 about and we'll conclude the day with a moderated	
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19 Matt Henn (Seres Therapeutics) 19 panel discussion focusing on some important question	
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1 introduce early as we begin to think about the data.

- 2 I think it's important that we also keep those in
- 3 mind. So the first has to do with endpoints and
- 4 endpoints form the basis of labeling claims. And
- 5 there are clinical endpoints, endpoints that describe
- 6 or reflect how an individual feels, functions, or
- 7 survives, a concept developed early on by the
- 8 Institute of Medicine and ultimately formally codified
- 9 by the FDA and its accelerated approval regulations.
- 10 Clinical endpoints are not the same as
- 11 surrogate endpoints. Surrogate endpoints are used as
- 12 a substitute for a direct measure of how a patient
- 13 feels, functions, or survives and are thought to
- 14 predict such effects. Now in terms of approval
- 15 pathway, there is -- pathways, there is accelerated
- 16 approval which can be supported by trials establishing 16 considerations in more detail. Next slide, please.
- 17 an effect on a surrogate endpoint reasonably likely to
- 18 predict clinical benefit.
- 19 There's also traditional approval
- 20 usually supported by trials establishing an effect on
- 21 a clinical endpoint, but can also be supported by
- 22 trials establishing effect on a validated surrogate

1 continue that. Next slide, please.

- 2 So we're going to be talking a lot
- 3 about use of decolonization this morning and use of
- 4 decolonization as a surrogate endpoint in clinical
- 5 trials would have pros and cons. So in addition to
- 6 other endpoint regulatory requirements, sponsors would
- 7 need to discuss the data with the agency that supports
- 8 that the endpoint is reasonably likely to predict
- 9 clinical benefit for this particular pathogen and
- 10 clinical situation.
- 11 And if there's accelerated approval,
- 12 sponsors would need to discuss with the agency the
- 13 plan to verify the clinical benefit. So I just wanted
- 14 to highlight that this morning. Heidi Smith this
- 15 afternoon will be going into the regulatory
- 17 I also think it's important that we
- 18 consider bundles in this space or prevention
- 19 strategies that usually involve these bundles or
- 20 evidence-based practices that are implemented
- 21 collectively. So for a new product that's part of a
- 22 bundle, data will be needed to understand the

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- 1 endpoint. Now a validated surrogate endpoint has very
- 2 persuasive data demonstrating its ability to predict
- 3 clinical benefit. That takes a fair amount of work
- 4 and data synthesis and a good example of that is HIV-1
- 5 plasma viral load which is a validated surrogate
- 6 endpoint. Next slide.
- 7 Now in terms of accelerated approval
- 8 which would be based on a surrogate endpoint, I just
- 9 wanted to highlight one part of the regulations for
- 10 you, that approval under this section will be subject
- 11 to the requirement that the applicant study the drug
- 12 further to verify and describe its clinical benefit
- 13 where there is uncertainty as to the relation of the
- 14 surrogate endpoint to clinical benefit or of the
- 15 observed clinical benefit to ultimate outcome.
- 16 So what this translates into is that
- 17 for Subpart H approval or approval based on a
- 18 surrogate endpoint, there is a requirement to continue
- 19 to study the drug further to demonstrate an effect on
- 20 a clinical endpoint. Usually sponsors do this by
- 21 simply continuing the clinical trial that initially
- 22 was evaluated based on the surrogate endpoint and they

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- 1 contribution of the new product to the benefit
- 2 demonstrated in the trial. And as others will point
- 3 out today, a consideration in this scenario is that
- 4 standardization between study sites needs to be
- 5 addressed in terms of these other evidence based
- practices. Next slide, please.
- 7 And then lastly, there are some other
- 8 design considerations. Ed Bein this afternoon is
- 9 going to talk us through some of the unique
- 10 statistical issues for cluster-randomized trials. And
- 11 it's important that these be discussed with the agency
- 12 as a trial is being designed because there's actually
- 13 quite a bit to wrap your head around and I think this
- 14 will be the beginning of a dialogue around some of
- 15 these issues.
- 16 For example, the cluster level risk
- 17 difference may not be equivalent to the individual
- 18 level risk difference and that individual patient
- 19 benefit is of course going to be a review
- 20 consideration. So lots to think about and we're
- 21 probably just going to start that process today. So I
- 22 want to thank everyone for joining us today and for

- 1 your commitment to prevention of healthcare-associated
- 2 infections.
- 3 I think we'll now have some
- 4 introductory words from our colleagues at CDC.
- MICHAEL CRAIG: Thanks so much, John.
- 6 I'm Michael Craig. I'm director of Antimicrobial
- 7 Resistance at the Centers for Disease Control and
- 8 Prevention. We are very excited to be with you today
- 9 and really want to appreciate John and the rest of the
- 10 FDA team for co-sponsoring this meeting with us today.
- 11 This is something that is very
- 12 important to us at CDC and something that we think
- 13 really holds a lot of potential in terms of saving
- 14 lives and importantly addressing the challenges of
- 15 antimicrobial resistance that we face, not only in the
- 16 United States but around the world.
- 17 And so from our perspective, and I
- 18 think the bottom line for us, is that we -- this day
- 19 to us is focusing on drugs that could potentially
- 20 prevent transmission of deadly pathogens, especially
- 21 those that are antimicrobial resistance. These
- 22 pathogens are often found in healthcare settings like

- 1 crosscutting antibiotic resistance portfolio. He is
- 2 the CDC's representative on the President's Advisory
- 3 Committee for Combating Antibiotic Resistant Bacteria,
- 4 align public health activities and related antibiotic
- 5 resistance across multiple federal agencies. Michael,
- 6 look forward to your talk.
- MICHAEL CRAIG: Thanks so much, Heidi.
- 8 And as I noted at the outset, this is very important
- 9 for us today, and one theme that you're going to hear
- 10 throughout the day is really prevention and the
- 11 challenge of stopping or limiting, reducing the
- 12 transmission of some very deadly pathogens. So why
- 13 don't we get started. Next slide.
- 14 I have nothing to disclose. And the
- 15 problem. So this is the big picture that, you know,
- 16 I'm not going to go into all the data on this. I
- 17 think a lot of you are familiar with it, but when we
- 18 talk about some of these deadly pathogens we're
- 19 talking about antimicrobial resistance pathogens which
- 20 have a high burden in the United States. When you
- 21 include the burden of C. diff, that's even higher.
- 22 We're talking about healthcare-
- Page 11
- 1 hospitals and nursing homes, and I think the challenge
- 2 that we see is that increasingly transmission is
- 3 driving the movement of infections and the movement of
- 4 these pathogens around the world.
- 5 So that's -- wanted to give that sort
- 6 of big picture context and then I'll pause here for
- 7 our moderators to introduce ourselves and then I'll
- 8 dive into my talk.
- DR. HEIDI SMITH: Hi, good morning.
- 10 This is Heidi Smith from FDA. I'll be moderating
- 11 session one along with Timothy Benson from FDA. I'll
- 12 be introducing the speakers for the first half of the
- 13 session, while Tim will be handling the second half of
- 14 the session. He'll introduce himself at that time.
- 15 In the interest of time, we'll get going with our
- 16 first speaker who is Michael Craig who now is going to
- 17 be talking about Prioritizing Prevention and
- 18 Diversifying our Patient Safety Toolbox:
- 19 Decolonization is a Missing Tool We Need.
- 20 Michael Craig is director of CDC's
- 21 Antibiotic Resistance Coordination and Strategy Unit
- 22 and leads coordination of CDC's \$180 million

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- 1 associated infections. We're talking about sepsis.
- 2 And all of these things were problems even before the
- 3 pandemic, but the pandemic has increased and made all
- 4 of these issues worse. So we've seen an increase of
- 5 15 percent of the number of antimicrobial resistant
- 6 infections and deaths in hospitals because of the
- 7 pandemic. And so these are challenges where we feel
- 8 like we need new prevention tools to better address
- 9 them. Next slide.
- 10 And the challenge that we face is
- 11 really only getting worse, and what this slide really
- 12 represents is the fact that antimicrobial resistance
- 13 is really accelerating and that we have more difficult
- 14 to treat pathogens every day and fewer effective
- 15 treatments. And we have some challenges with the drug
- 16 pipeline that we need to overcome, and I want to
- 17 highlight we're very supportive of new antibiotics to
- 18 treat some of these infections, but we also want the
- 19 conversation to be talking about what we can do to
- 20 prevent them as well. Next slide.
- 21 And the thing that we want to underline
- 22 is that it's not about just preventing an infection,

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- 1 but it's really that we've come to rely upon effective
- 2 antibiotic treatment for a variety of things. Modern
- 3 medicine and our healthcare system is really
- 4 predicated on it. And we've made incredible
- 5 advancements in all of the areas that you see on this
- 6 slide, including many others, but those advancements
- 7 and that longer lifespan that we have because of those
- 8 advancements is really predicated on the efficacy of
- 9 antibiotic therapy.
- 10 And as that declines and as we see more
- 11 prevention of very deadly pathogens, so too we're
- 12 going to lose the innovation and the and the extra
- 13 years saved by many of these innovations in our
- 14 country. Next slide.
- 15 And so where are we today? Next slide.
- 16 So, one thing I want to underline is
- 17 that we're, you know, still dealing with COVID and
- 18 there are some prevention lessons that I think that
- 19 are important to bear for this conversation. One is
- 20 that importantly, we cannot treat our way out of a
- 21 pandemic, an epidemic, or an outbreak. We need to
- 22 have treatment options, but we also need to have

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- 1 prevention therapies or prevention modalities that can
- 2 really stop the spread of infectious diseases and
- 3 deadly pathogens.
- 4 The other thing that I want to
- 5 underline is that we get what we pay for. I think
- 6 this is very much evidence by the pandemic when there
- 7 was a lot of advancement and a lot of investment that
- 8 went into the development of the vaccines that we then
- 9 later accelerated for development for the pandemic.
- And because of that previous
- 11 investment, we had those ready to go and I think
- 12 that's the thing that we want to underline here is
- 13 that, as John said, we want to start this conversation
- 14 and we want to bring attention and resources and time
- 15 to bear on these problems so that when we need these,
- 16 which I would say we arguably already need them, but
- 17 when these problems get even worse, we have some of
- 18 these potentially ready to go and that we can use and
- 19 deliver to fight these problems, especially if we're
- 20 in the situation where we're fighting those pathogens
- 21 again in the middle of another pandemic. Next slide.
- 22 This is to illustrate really the

1 challenge that we face. So Boxes 1 and 2 really

- 2 underline how we address these issues today, and Box 3
- 3 sort of underlines what's missing. So we have the
- 4 ability to detect when someone is colonized with one
- 5 of these deadly pathogens. So that means that the
- 6 pathogen is living in them, on them. It's not
- 7 necessarily causing infection but it increases their
- 8 risk of infection, and we have ways to reduce the
- 9 potential transmission and the potential risk to that
- 10 patient.
- 11 A lot of these are very familiar. They
- 12 are infection prevention and control, they are hand
- 13 washing. They're the bread and butter that you see
- 14 and that we stress so many times by the CDC in terms
- 15 of prevention of infections. They are good, but they
- 16 are not perfect and they cannot eliminate the risk to
- 17 the individual and they cannot eliminate the risk of
- 18 transmission.
- 19 And so what we would like is we would
- 20 like to add additional modalities, additional
- 21 potential drugs, or other things that could be brought
- 22 to bear so that we could further reduce and maybe even

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- 1 eliminate the risk of that colonization becoming an
- 2 infection in an individual or that colonization
- 3 spreading to others and being transmitted in sites
- 4 like nursing homes or ICUs. Next slide.
- 5 And I think the thing that we want to
- 6 note is a prevention approach we know works. So this
- 7 slide already notes to you that when we've used some
- 8 of these steps before, even without drugs, we have
- 9 been able to show that a prevention approach can have
- 10 success against these bad bugs. The one thing that we
- 11 would also like to underline is that from the patient
- 12 perspective, the best infection is really the one that
- 13 never happens, and that's what we want to go for.
- 14 Prevention ultimately saves lives,
- 15 reduces -- and infections, and I think the thing to
- 16 also note that is very important for some of these
- 17 conversations especially when we're talking about
- 18 antimicrobial resistance, is that prevention reduces
- 19 our need for antibiotics and antifungals to treat
- 20 these. So if you prevent the infection, you don't
- 21 have to worry about whether the antibiotic or the

22 antifungal that you have is going to work or not. So

5 (Pages 14 - 17)

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1 it reduces a lot of that pressure.

2 The other thing to note that I think

- 3 often goes overlooked is that even if someone survives
- 4 an infection, they can sometimes have lasting and long
- 5 term consequences and these could be related to the
- 6 antibiotic use, the antifungal use, or they could
- 7 potentially be related to sepsis or whatever happened
- 8 during the course of that infection. Next slide.
- So from the CDC perspective, the thing
- 10 that we want to really highlight is that we want to
- 11 have a prevention mindset related to some of our drug
- 12 development and what can happen. So we want to focus
- 13 on treatment, but we also want to focus on prevention
- 14 and how do we use potentially these drugs to reduce 15 that pressure of transmission and to reduce some of
- 16 what we're seeing in terms of antimicrobial resistance
- 17 spreading in some of these settings.
- 18 So we need evidence, as John noted, and
- 19 I think he very articulately noted many of the
- 20 challenges that you're going to hear more today in
- 21 some of the discussions, and we need to figure out how
- 22 we can do this also without accelerating antimicrobial

1 to ten times those that are affected. If you look at

- 2 specific cohorts at risk, as you can see here, we have
- 3 five million patients admitted to U.S. ICUs. We have
- 4 1.3 million people in nursing homes. These are
- 5 cohorts of people where we know they are potentially
- 6 at risk because of colonization and transmission and
- 7 where we have a lot of engagement.
- And lastly, I would just note, is that
- we know the resistance problem goes well beyond the
- 10 United States and that the burden of this is
- 11 increasing globally with an enormous burden around the
- 12 world. Next slide.
- 13 This is just a note to you that this is
- 14 again not a flash in the pan consideration for us.
- 15 This is something that is important for CDC and
- 16 important for FDA and something that we want to make
- 17 sure that is a part of our national action plan and
- 18 would note that this is in fact something that we put
- 19 in our national action plan in 2020, and as John said,
- 20 this is really what we see as a kicking off a
- 21 conversation with you all about how we can best do
- 22 this to protect patients and individuals from

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- 1 resistance. And I think that's an important point
- 2 that we want to make is that we don't want to use any
- 3 drug to treat transmission, but we don't want that
- 4 drug to exacerbate the problem in another way.
- 5 So these are going to potentially be
- 6 unique products that have unique qualifications and
- 7 you're going to hear some of those considerations
- 8 later, but we think it is important to focus on
- 9 whether we can bring these to market and whether we
- 10 can use them in our patient populations.
- 11 The other thing that I would note is
- 12 that there's a lot of challenges that we see in the
- 13 drug pipeline and some of the issues are whether
- 14 there's a market for new antibiotics. The thing that
- 15 I think we see as a potential positive benefit and a
- 16 consideration is that if we talk -- start looking at
- 17 the number of people who are colonized, it's
- 18 potentially a much greater market and potentially a
- 19 much greater engagement with the private sector to
- 20 bring something to market.
- So the number of people who are 21
- 22 colonized versus infected with some of these is five

1 transmission of these pathogens. Next slide.

- So I'm going to highlight briefly what
- 3 we need, but you're going to hear from some fantastic
- 4 CDC colleagues later about -- that go into more
- 5 specific pathogen areas, but the things I want to note
- 6 for you is that we really want to prevent recurrence
- 7 and do more than decontaminate. So we want to protect
- 8 and potentially restore the microbiome because we
- 9 think that this will have long lasting positive
- 10 benefits both to the individual as well as to cohorts
- 11 in reduction of transmission.
- 12 We want to reduce pathogen burden
- 13 and/or eliminate pathogens completely. And it's even
- 14 better if that has a targeted application body site.
- 15 And you're going to hear later from some patient
- 16 advocates, and there are communities out there,
- 17 specifically the cystic fibrosis community where, you
- 18 know, decontaminating the lungs and reducing the
- 19 burden on that community from these resistant
- 20 pathogens would be a major game changer and a major
- 21 benefit in terms of giving them more quality of life
- 22 and longer life. And those are some areas that we'd

- 1 like to see if they have potential for targeting.
- 2 The other thing that we want to note is
- 3 that sub-bullet there, is that we do not want these
- 4 products to drive or increase antimicrobial resistance
- 5 and we want to make sure that we're using them in a
- 6 way that is effective at reducing transmission and
- 7 reducing the problem and not adding to the problem.
- 8 Finally, as John noted, we want to
- 9 consider both benefit for the individuals as well as
- 10 populations that they may be a part of. We
- 11 appreciate, as you can see on the right side of this
- 12 slide, that there are some challenges with this and
- 13 that's why we want to enter this dialogue with you and
- 14 see what we can do to overcome these challenges.
- 15 These are things that, you know, we
- 16 don't take for granted and we appreciate that this is
- 17 some out-of-the box thinking, but we also think that
- 18 it's critically important for the way we address
- 19 antimicrobial resistance and healthcare-associated
- 20 infections moving forward, and if we can come up with
- 21 development pathways and prove this and overcome some
- 22 of these challenges, we think that this could be a
- Page 23
- 1 major game changer in our ability to address these
- 2 threats in the United States and beyond. Next slide.
- 3 And so we just want to note to you our
- 4 objectives today and I think these are in some of the
- 5 materials that you've seen and I think John gave a
- 6 great overview of this to begin with, so I won't
- 7 belabor it. It's really to talk about where we are
- 8 and where we could go and again start that dialogue
- 9 with you and start the conversation, talk about some
- 10 of these challenges, and see what we could potentially 10 example, the microbial load of a resistant organism
- 11 do to address them.
- 12 For discussion, these three questions
- 13 are going to be part of a moderated panel with all of
- 14 our speakers at the end of the day that myself and
- 15 Peter Kim will be moderating and we really look
- 16 forward to active engagement and dialogue with
- 17 everybody. Next slide.
- 18 And with that, I will close and turn
- 19 over to the moderator for additional presentations for
- 21 Centers for Disease Control and Prevention.
- 22 DR. HEIDI SMITH: Thank you, Michael.

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- 1 So our next speaker will be John Jernigan who will be
- 2 talking about Rationale for Decolonization as a
- 3 Strategy for Preventing Antimicrobial-Resistant
- 4 Infections. Dr. Jernigan serves as the chief of
- 5 Epidemiologic Research and Innovation Branch in the
- 6 Division of Healthcare Quality and Promotion at CDC.
- 7 He has 30 years of experience in clinical infectious
- 8 diseases and healthcare epidemiologic research. Thank
- 9 you, John.
- 10 DR. JOHN JERNIGAN: Thank you very
- 11 much. Next slide.
- 12 In this presentation, after reviewing
- 13 some definitions, I'll cover some important
- 14 observations about the epidemiology of healthcare-
- 15 associated infections or HAIs. I'll discuss the role
- 16 of colonization in the pathogenesis of HAIs, the role
- 17 of transmission in driving antimicrobial resistance,
- 18 and finally the potential role of decolonization as a
- 19 prevention strategy. Next slide.
- 20 First, a few definitions that will be
- 21 helpful for our discussions today. Colonization
- 22 simply refers to the presence of a microorganism
- Page 25
- 1 living on or in a host, but not causing disease or
- 2 symptoms. But there are some nuances that are
- 3 relevant for today's discussions. The duration of
- 4 colonization is often prolonged and colonized body
- 5 sites such as mucosal surfaces can serve as a source
- 6 of transient contamination of another body site such
- 7 as the skin.
- 8 In addition, the burden or microbial
- 9 load of colonization can be dynamic over time. For
- 11 might increase with antibiotic exposure. Finally,
- 12 colonization can and does transition to infection
- 13 through various routes or mechanisms. Next slide.
- 14 Decolonization, by its strict
- 15 definition, refers to complete elimination of the
- 16 colonizing microorganism, but for the purpose of our
- 17 conversations today, I invite you to think about
- 18 decolonization in a slightly broader context to
- 19 include pathogen burden reduction or reduction in
- 20 today. And I again want to thank you on behalf of the 20 microbial load of the colonizing pathogen.
  - 21 And even further, I invite you to think
  - 22 about how even transient reduction in microbial load

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1 might be beneficial, especially if it is strategically

- 2 designed to correspond to a relatively short period of
- 3 increased infection rates, such as during a period of
- 4 high risk healthcare. You will hear Dr. McDonald's
- 5 presentation, how this principle is already being used
- 6 to some extent in some antibiotic prophylaxis
- 7 applications. Next slide.
- Now to the epidemiologic principles
- 9 that underpin the rationale for decolonization.
- 10 First, we know that colonization is important in the
- 11 pathogenesis of HAIs. Patients in healthcare are
- 12 often subjected to interventions that provide
- 13 opportunities for colonizing pathogens to invade
- 14 sterile body sites. Examples include surgical
- 15 incisions and use of various indwelling catheters. In
- 16 addition, a disrupted microbiota such as that of the
- 17 large intestine can create a niche where pathogens can 17 microbial load of colonization. In a prospective
- 18 proliferate and find their way into sterile body sites
- 19 either through contamination of invasive devices and
- 20 incisions or through translocation directly from the
- 21 gut. Next slide.
- 22 So let's review some evidence that

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- 1 colonization plays a role in pathogenesis. First, we
- 2 know that HAIs are usually caused by pathogens that
- 3 colonize the patient prior to the infection onset.
- 4 This slide provides a sampling of evidence. For the
- 5 sake of time, I won't go through all of these but will
- 6 highlight that greater than 80 percent of staph aureus
- 7 bacteremia and surgical site infections are caused by
- 8 pre-infection colonizing strains and similar
- 9 observations are described for a wide variety of
- 10 pathogens in a variety of healthcare settings. Next
- 11 slide.
- 12 Although studies -- these studies
- 13 demonstrate an association between colonizing and
- 14 infecting pathogens, does colonization by a pathogen
- 15 actually increase the risk of a subsequent infection?
- There's growing evidence that it does. In the Swedish 16 bacterial strains having resistant strains, but those
- 17 cohort study results shown on the left, individuals
- 18 colonized with extended-spectrum beta-lactamase
- 19 producing Enterobacterales had a 32-fold increased
- 20 risk compared to the general population of incident
- 21 bloodstream infections caused by the same organism
- 22 over the six-year observation period.

- And on the right, in a study of 1
- 2 patients undergoing colorectal surgery, colonization
- 3 by ESBL-producing organisms was independently
- 4 associated with a twofold increased risk of surgical
- 5 side infections and infections caused by ESBL
- 6 producers was four times more likely in carriers than
- 7 in noncarriers. And although the references aren't
- 8 shown here, colonization with ESBL producers has also
- 9 been found to increase the risk of infection following
- 10 transrectal prostate biopsy and also liver
- 11 transplantation. Next slide.
- 12 There's also clear risk with staph
- 13 aureus colonization where preoperative carriage risk
- 14 increases risk of postcardiac surgical wound infection
- 15 by a factor of ten. And importantly, there's also
- 16 evidence that the risk of infection varies with the
- 18 study of residents of long-term acute care hospitals,
- 19 the relative abundance of carbapenemase-producing
- 20 Klebsiella pneumoniae colonization was predictive of
- 21 subsequent bacteremia caused by this organism.
- 22 Similarly, in stem cell transplantation

- 1 patients, intestinal domination by enterococcus
- 2 defined as greater than 30 percent of sequences in the
- 3 microbiota was associated with a ninefold increased
- 4 risk of VRE bloodstream infection. Next slide.
- 5 Another epidemiologic underpinning for
- 6 decolonization as a resistance prevention strategy is
- 7 that transmission is an important driver of resistance
- 8 burden. In other words, transmission between
- 9 individuals either directly or indirectly increases
- 10 the number of people who become colonized and infected
- 11 with resistant organisms. To help make this point,
- 12 let's review how antibiotic resistance usually emerges
- 13 in bacteria. Next slide.
- 14 Oftentimes when an individual is
- 15 exposed to an antibiotic, they're already carrying
- 17 strains may be present in small clinically or
- 18 epidemiologically insignificant numbers. How did
- 19 those strains get there in the first place? By one of
- 20 three mechanisms: one, random genetic mutation; two,
- 21 through acquisition of resistance genes from other
- 22 bacteria; or three, through transmission from other

1 people or the environment.

2 The first mechanism, random genetic

3 mutation, is often a very rare event for some of our

- 4 most prevalent resistance problems and so transmission
- 5 plays a critical role in determining the ultimate
- 6 burden of resistance.
- Once a resistant strain is present in
- 8 or on an individual, exposure to antibiotics confers a
- 9 selective advantage, increasing the proportion and
- 10 total burden of resistant organisms which increases
- 11 risk of onward transmission of resistant strains to
- 12 others and may also increase the risk of horizontal
- 13 transmission of resistance genes to other bacteria,
- 14 some of which may already possess characteristics
- 15 making them quite adept at transmission and causing
- 16 infection.
- 17 An acquisition of resistance genes by
- 18 such bacteria may result in creation of a new and more
- 19 dangerous resistant pathogen, one that is highly fit
- 20 for spread. Next slide.
- 21 It is the case that some of our most
- 22 serious resistance problems have been driven largely

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- 1 by transmission of highly fit clonal strains. Some
- 2 examples of this include MRSA colonial groups USA100
- 3 and 300, which account for the lion's share of
- 4 healthcare- and community-associated MRSA
- 5 respectively; group ST258 carbapenemase-producing
- 6 Klebsiella pneumoniae, helping to drive international
- 7 spread of carbapenem resistance; rapid growth of
- 8 ESSBL-producing E. coli associated with clonal group
- 9 ST131; and rapid emergence of ribotype 027 C.
- 10 difficile. Next slide.
- 11 Transmission of highly fit strains may
- 12 have been a particularly important driver of
- 13 antimicrobial resistance in healthcare settings, where
- 14 there exists a confluence of factors that favor
- 15 transmission of resistant organisms such as high risk
- 16 patient populations, intense antibiotic use and dense
- 17 contact networks involving close interaction among
- 18 patients, healthcare workers, and the environment.
- 19 Next slide.
- 20 This graphic depicts a simple
- 21 illustration of how burden of colonization in patients
- 22 may drive transmission. In the pink box, you see a

- 1 colonized patients who can serve as a reservoir of
- 2 transmission to the healthcare workers who care for
- 3 them and who in turn can transmit to other patients in
- 4 their care. The patient can also contaminate the
- 5 environment, which can also serve as a reservoir of
- 6 transmission. The thickness of the transmission lines
- 7 in this graphic denotes the magnitude of transmission
- 8 risk. Next slide.
- 9 Under conditions where the patient's
- 10 microbial load of colonization is high, there's more
- 11 shedding and increased risk of downstream
- 12 transmission. Next slide.
- 13 Infection control practices such as
- 14 hand hygiene, use of gowns and gloves, and
- 15 environmental cleaning create barriers that reduce the
- 16 risk of onward transmission, but their effectiveness
- 17 is not 100 percent. Under conditions of high
- 18 microbial load colonization and high shedding, there
- 19 may be substantial residual transmission despite
- 20 infection control barriers. Next slide.
- 21 Under conditions where the microbial
- 22 load of colonization is low, the same proportional

- 1 decrease in risk attributable to infection control
- 2 will likely translate into a substantially lower
- 3 absolute residual risk in comparison to their use of
- 4 conditions of high colonization burden.
- 5 Theoretically, therefore, reducing microbial load of
- 6 colonization may work synergistically with traditional
- 7 infection control precautions to prevent transmission
- 8 in healthcare. Now, is there any real world evidence
- 9 that reducing colonization burden translates into less
- 10 transmission? Next slide.
- 11 In this study, Dr. Weinstein and
- 12 colleagues examined the effect of daily chlorhexidine
- 13 bathing of ICU patients on burden to VRE transmission
- 14 and colonization. After implementing chlorhexidine
- 15 bathing, they demonstrated reduction of VRE on
- 16 patients' skin, decreased VRE contamination on
- 17 environmental surfaces and on the hands of healthcare
- 18 workers, and most importantly, decreased acquisition
- 19 of VRE colonization by patients.
- 20 You'll see similar data showing the
- 21 relationship between colonization burden and
- 22 transmission for other resistant pathogens in

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Meeting Page 34 1 subsequent talks by Dr. Walters and Dr. Sexton. Next 1 2 slide. 3 3 Prevention of colonization is important 4 intermediate outcome, but is there evidence that 5 5 decreasing colonization translates into decreased 6 infections? The answer is yes, and quite a bit of it. 7 Here, for example, are six randomized trials all 8 8 showing significant reductions in infection 9 attributable to decolonization strategies in various 10 patient populations. I'm not going to review these in 11 detail. You'll hear more about some of these in Dr. 12 12 Ham's talk a little later. Next slide.

13

It's important to examine more closely 14 the mechanisms of action by which decolonizing agents 15 can provide benefit. First, they can reduce risk of 16 transitioning from colonization to infection in 17 colonized individuals who were treated. We refer to 18 this as direct benefit. Second, they can reduce risk 19 in uncolonized individuals and the surrounding 20 population, even if they are untreated, through 21 decreasing shedding and transmission from the treated

22 colonized individual. We refer to this as indirect

1 benefit.

2 A third mechanism occurs in settings 3 where decolonizing agents are used in all members of a 4 population, regardless of known colonization status, 5 for example, daily chlorhexidine bathing in ICU 6 patients. In this case, the intervention might 7 further reduce risk of acquiring colonization in 8 uncolonized individuals who are treated. Let me give 9 a simple illustration of the concept of indirect

10 benefit of decolonization. Next slide. 11

Imagine a patient gets admitted to a 12 healthcare facility and is colonized with a resistant 13 pathogen, colonization depicted here by the yellow 14 color. Next slide.

15 And let's assume colonization 16 progresses to infection in this patient, depicted by 17 the change to red. Next slide.

18 And that the infection results in death 19 depicted by the X. Next slide. 20 Let's also assume that before death,

21 the patient served as the reservoir of transmission to

22 two additional patients. Next slide.

And each of these colonized patients

2 transmitted to two additional patients. Next slide.

And these in turn also transmitted to

4 others. Next slide.

And so on, so that the index patient

6 was the original source of transmission to 30

7 additional patients. Next slide.

And let's assume that of these 30

9 additional colonized patients, nine of them progressed

10 to infection, resulting in a total of ten infections,

11 including the index patient. Next slide.

Again, for the purposes of

13 illustration, let's assume the mortality of infection

14 given the decreased effectiveness of existing

15 infection treatment drugs due to resistance is high at

16 40 percent. Therefore, four of the ten infected

17 patients including our index patient die. How might

18 new treatments have impacted the outcomes here? If

19 the pharmaceutical industry were to produce a novel

20 treatment drug that reduces mortality of infection by

21 half in comparison to existing therapy this would, by

22 current standards, represent a significant advance in

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1 therapeutic options. In our scenario, using the novel

2 treatment agent -- next slide -- would bring the

3 mortality down to 20 percent, meaning we would have

4 seen only two deaths rather than four.

5 In other words, two lives were saved by

6 the novel treatment. Note that no infections were

7 prevented. Next slide.

8 On the other hand -- next slide.

9 On the other hand, what if the

10 pharmaceutical industry provided a novel and

11 effectively colonizing agent? If such an agent had

12 been used by the index patient at the time of

13 admission -- next slide -- it would have had the

14 direct effect of preventing the index patient from not

15 only becoming infected but also subsequently dying.

16 Next slide.

17 But in addition, it would have also

18 prevented the index patient from becoming a source of

19 transmission, thereby preventing 30 colonizations,

20 nine infections, and the two deaths that occurred

21 despite use of the new and improved treatment agent.

22 This additional benefit resulting from prevention of

1 transmission is again referred to as indirect benefit.

2 Next slide.

3 These simple graphs summarize and

4 compare the benefit of the two novel agents. Direct

5 benefit is depicted in blue and indirect benefit is

6 depicted in yellow. In the graph on the left, you can

7 see that the decolonizing agent prevented twice as

8 many deaths as the infection treatment agent, and most 8 and extended Dr. Toth's model to include not just

9 of that benefit was indirect. From the right, you can

10 see that the novel infection treatment drug prevented

11 no infections while the decolonization agent prevented 1 accounted for interfacility CRE transmission by

12 10 infections, again mostly attributable to indirect

13 benefit.

14 Now obviously this is an oversimplified

15 demonstration designed to emphasize the theoretical

16 importance of indirect benefit. Well, what would such16 blue represents infections in acute care facilities

17 benefit look like in real world use? To gain some

18 insight, let me present some evidence from

19 mathematical modeling. Next slide.

20 These are results from a mathematical

21 transmission model developed by Damon Toth and

22 colleagues at the University of Utah designed to

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1 prevented increases by an order of magnitude when the

2 indirect effect is considered. Or another way to look

3 at it, studying the benefit of decolonizing agents are

4 likely to be dramatically underestimated if only

5 direct benefit is measured. Next slide.

6 This graph represents work by Dr.

7 Prabasaj Paul and Hannah Woolford at CDC who modified

9 LTACHs, but U.S. acute care inpatient facilities and

10 skilled nursing facilities or SNFs. Their model also

12 patient transfer and examined three different

13 decolonization strategies.

14 Green portions of the bars represent

15 CRE BSIs in LTACHs and ventilator-capable SNFs, while

17 and non-ventilator capable SNFs. Each bar represents

18 annual national incidents under a specific

19 decolonization strategy. From left, the first bar

20 estimates annual incidents of CRE BSIs if no

21 decolonization therapy is used. The next bar

22 represents incidents of decolonization if it's used --

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1 quantify the effect of a hypothetical decolonizing

2 agent targeting carriers of carbapenem-resistant

3 Enterobacterales or CRE and long-term acute care

4 hospital in-patients or LTACHs. The model was 5 parameterized rise using a study of Chicago area

6 LTACHs which provided real-world observational data on

7 rates of CRE transmission prevalence, clinical

8 detection, and bloodstream infection rates.

Using this model, they estimated the

10 number of CRE bloodstream infections that would be

11 prevented if an effective decolonizing agent was used

12 for all known CRE carriers as detected through routine

13 clinical culturing. And then they extrapolated to

14 national estimates based on the number of LTACH beds

15 and annual discharges nationally. These findings were

16 based on it a presumed admission prevalence of 1

17 percent.

18 The green bar depicts the number of CRE

19 bloodstream infections prevented by direct effect,

20 while the blue bar depicts CRE bloodstream infections

21 prevented when considering both indirect and --

22 indirect benefit. You can see that the number of BSIs

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1 in all incidents of CRE BSIs if decolonization is used

2 for all CRE-colonized patients, again as detected

3 through routine clinical cultures in both LTACHs and

4 ventilator SNFs.

5 The third bar represents incidents when

6 decolonization is used for CRE-colonized patients in

7 all facility types. And the fourth bar represents a

8 strategy similar to the third bar, the exception being

9 that for LTACHs and ventilator SNFs, all residents

10 were screened for CRE colonization, rather than

11 relying on routine clinical cultures to detect

12 carriers, and therefore all CRE-colonized patients

13 were treated in these facilities.

14 According to the model, this approach

15 would result in prevention of greater than 9,000 CRE

16 bloodstream infections annually in the U.S. compared

17 to baseline, a 64 percent reduction. Note that the

18 model suggests that at steady state a reproductive

19 number or R0 would be reduced to less than one.

20 meaning that CRE transmission and the risk of CRE BSIs

21 would be essentially eliminated. Next slide.

22 Dr. Paul also calculated the number

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- 1 needed to treat with decolonization therapy to prevent
- 2 a single CRE infection. You can see that the values
- 3 for the number needed to treat are around one
- 4 representing substantial public health benefit and
- 5 return on investment. Next slide.
- 6 To summarize, I tried to demonstrate
- 7 that colonization by antibiotic resistant pathogens
- 8 increases risk of infection as -- and is an important
- 9 driver of antibiotic resistance, particularly in
- 10 healthcare. Therefore, reducing colonization may be a
- 11 potent antibiotic resistance prevention strategy.
- 12 Furthermore, because of their potential for indirect
- 13 benefit, efforts to produce and improve and approve
- 14 novel safe and effective decolonizing agents are
- 15 likely to prevent substantially more harm from
- 16 antibiotic resistance than can be prevented if we
- 17 focus drug development solely on drugs that treat
- 18 infections. Next slide.
- We're hoping that today's discussion
- 20 can encourage more research and development for agents
- 21 designed to reduce or eliminate colonization by
- 22 pathogens and also spark conversation about a roadmap

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- 1 for regulatory approval for such agents. We think
- 2 there's still a lot of wisdom in the old adage, an
- 3 ounce of prevention is worth a pound of cure. Thank
- 4 you for your attention.
- 5 DR. HEIDI SMITH: Thank you very much,
- 6 John. We're going to move on to our next speaker who
- 7 is Clifford McDonald who's going to be speaking about
- 8 Decolonizing Approaches: Current State and Future
- 9 Needs. Dr. McDonald is currently associate director
- 10 for science in the Division Healthcare Quality
- 11 Promotion at CDC. He's published extensively in
- 12 healthcare-associated infections, especially C.
- 13 difficile infections and antibiotic resistance and has
- 14 led efforts of his division to explore application of
- 15 microbiome science to public health. Thank you. Dr.
- 16 McDonald.
- 17 DR. CLIFFORD MCDONALD: Good morning.
- 18 I will be speaking to you today about decolonizing
- 19 approaches, including current state and future needs.
- 20 Next slide, please.
- 21 I have no financial disclosures and the
- 22 findings and conclusions of this presentation are mine

1 and do not necessarily represent the official position

- and do not necessarily represent the official positio
- 2 of the CDC. Also I will be speaking today of some
- 3 non-FDA approved drugs that are currently under
- 4 development as well as off-label use of FDA approved
- 5 drugs. My take home messages are that decolonization
- 6 and pathogen reduction are already widely used for
- 7 prevention in some forms of antimicrobial prophylaxis.
- 8 Second, we can learn from unfolding
- 9 failings of antimicrobial prophylaxis. From what we
- 10 learn, we can propose certain attributes that future
- 11 decolonization strategies should ideally possess.
- 12 Current and future products span various compositions
- 13 and modes of action and there is a central role for
- 14 the human microbiome in colonization resistance that
- 15 should be considered in all decolonization and
- 16 pathogen reduction strategies.
- 17 A tolerable safety margin is impacted
- 18 by local versus systemic body site distribution and --
- 19 of a drug and target versus risk-based implementation
- 20 strategies. Finally, to achieve effectiveness, it is
- 21 important to tailor the intervention and its timing to
- 22 the duration and timing of maximum risk of infection.

- 1 Next slide, please.
- 2 First, decolonization and pathogen
- 3 reduction is already widespread in some forms of
- 4 antimicrobial prophylaxis. When we think of
- 5 antimicrobial prophylaxis, we often think of surgical
- 6 antibiotic prophylaxis but in practice it involves any
- 7 localized or systemic administration of an
- 8 antimicrobial to prevent infection through a range of
- 9 mechanisms.
- These include decolonization and
- 11 pathogen reduction but also various combinations of
- 12 prevention of invasion or translocation and prevention
- 13 of attachment involved in establishing infection.
- 14 Next slide, please.
- 15 I begin with examples where
- 16 decolonization and pathogen reduction or pilot
- 17 pathogen reduction are most clearly their mode of
- 18 action, as these are also examples of the
- 19 effectiveness of approach to the point that some are
- 20 incorporated into evidence-based practice
- 21 recommendations.
- 22 Chief among these is the preoperative

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- 1 application of nasal mupirocin to prevent staph aureus
- 2 infections following cardiac and orthopedic surgery.
- 3 This appears in WHO guidelines as well as relevant
- 4 U.S. professional society guidelines. Another is
- 5 preoperative administration of non-absorbed
- 6 antimicrobials along with mechanical bowel preparation
- 7 to prevent surgical infection and anastomotic leaks
- 8 following bowel surgery. Again, this is recommended
- 9 in WHO and relevant professional society guidelines.
- 10 There are also recommendations to
- 11 prevent secondary cases of meningococcal disease using
- 12 oral antibiotics. Finally, another other form of
- 13 antimicrobial decolonization or pathogen reduction is
- 14 the use of selective digestive decontamination and
- 15 oral decontamination to prevent infections and reduce
- 16 mortality in intensive care unit or ICU patients.
- 17 This is currently a nationally recommended practice in
- 18 the Netherlands. Next slide, please.
- 19 Here's a diagram that outlines the use
- 20 of selective digestive decontamination and the types
- 21 of agents used. These are administered from the first
- 22 day of admission to an intensive care unit in any

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- 1 patient expected to stay longer than two to three days
- 2 during which they are expected to receive ventilator
- 3 care. Systemic antibiotics included in the regimen
- 4 consists most commonly of a third generation
- 5 cephalosporin continued for four days. The idea
- 6 behind both the topical and systemic antibiotics is
- 7 that these regimens have relatively little impact on
- 8 the largely anaerobic microbiota of the large
- 9 intestine and oropharynx.
- 10 I would refer the audience to the
- 11 narrative review referenced here to read more about
- 12 the evolution of this practice. Based upon this
- 13 review, I have prepared my first two supplementary
- 14 slides to assist the audience in understanding some of
- 15 the issues encountered in studying this practice, as
- well as evidence for the practice from cluster
- 17 randomized trials. Next slide, please.
- 18 The conclusions of the authors of this
- 19 narrative review is that the practice of selective
- 20 digestive decontamination is consistently associated
- 21 with less resistance and improved patient outcomes in 21 worldwide increases in breakthrough post-biopsy
- 22 settings with low prevalence of antibiotic resistance

1 such as the Netherlands. However, in settings with

- 2 moderate to high resistance such as other parts of
- 3 Europe, the benefits are less clear.
- 4 I would note that the main negative
- 5 study that led to the second sentence was a multisite
- 6 European study in which the systemic cephalosporin was
- 7 not administered over fear that it might drive
- 8 infections with gram-negative bacteria possessing
- 9 extended spectrum beta-lactamases which were prevalent
- 10 in many of the study locations. Again, I refer the
- 11 audience to my supplementary slides about the measured
- 12 impacts of this practice on resistance.
- 13 There has also been one in vitro study
- 14 demonstrating the colistin use as part of the
- 15 decontamination regimen can drive microevolution of
- 16 resistance. There has only been one study to date of
- 17 the microbiome of patients receiving these regimens
- which did, not unexpectedly, demonstrate a degree of
- 19 microbiome disruption relative to healthy controls.
- 20 However, the status of microbiome disruption relative
- 21 to usual ICU care has not been studied.
- 22 Before moving to my next slide, I will

- 1 note that my third supplementary slide highlights
- 2 examples of antimicrobial prophylaxis with currently
- 3 little role for decolonization and pathogen reduction
- 4 and ask the question whether these may be missed
- 5 opportunities for future advanced methods of
- 6 decolonization and pathogen reduction. Next slide,
- 7 please.
- 8 Let's now turn our attention to two
- 9 areas where there are unfolding failings of
- 10 antimicrobial prophylaxis and in which decolonization
- 11 and pathogen reduction plays a variable role. Both
- 12 involve the use of fluoroquinolones and are shown on
- 13 this slide. The first is use of oral systemic
- 14 fluoroquinolones to prevent infections following
- 15 transrectal biopsies. The fact that some studies
- 16 indicate improved prevention with administration
- 17 beginning one day before the procedure provides some
- 18 evidence the fluoroquinolone alone acts in part
- 19 through decolonization and pathogen reduction.
- 20 Regardless, there are now recent
- 22 infections with intestinal colonization by

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- 1 fluoroquinolone-resistant gram-negative pathogens
- 2 increasing the risk of these breakthrough infections.
- 3 The other unfolding failing after a long period of
- 4 successful use is the systemic use of fluoroquinolones
- 5 to prevent bloodstream infections in neutropenic
- 6 patients.
- 7 There are now increasing reports of
- 8 clusters of breakthrough infections and in subsequent
- 9 slides I will provide evidence how these reflect the
- 10 role of decolonization and pathogen reduction as well
- 11 as how fluoroquinolone were poorly designed for this
- 12 purpose. Next slide, please.
- First, we have heard previously of the
- 14 phenomenon of intestinal domination when a single
- 15 species or group of species over grows the microbiome,
- 16 most commonly that of the lower intestine or gut.
- 17 Here we see results of a study in which 113
- 18 hematopoietic stem cell transplant recipients
- 19 underwent serial stool sampling and microbiome
- 20 analysis, associating results of these analyses with
- 21 various exposures and subsequent bacteremias.
- In this study domination was defined by

- 1 So in summary, intestinal domination by
  - 2 gram-negative pathogens is associated with subsequent
  - 3 bloodstream infection and fluoroquinolone prophylaxis
  - 4 normally reduces the risk of intestinal domination by
  - 5 gram-negative pathogens and colonization with
  - 6 fluoroquinolone-resistant gram-negative pathogens
  - 7 increases risk for breakthrough infection. Therefore,
  - 8 the protection from fluoroquinolone prophylaxis is
  - 9 mediated at least in part through pathogen reduction
  - 10 and fluoroquinolone resistance leads to breakthrough
  - 11 infections through breakthrough intestinal dominance.
  - 12 Next slide, please.
  - So what can we learn in here about
  - 14 possibly improved approaches? Fluoroquinolones were
  - 15 developed for short-term treatment of local infection
  - 16 through systemic administration and not specifically
  - 17 for decolonization or pathogen reduction. Some key
  - 18 characteristics make them well suited for the former
  - 19 use and not so well suited for the latter. First,
  - 20 fluoroquinolones are highly absorbed following oral
  - 21 administration and have excellent body site
  - 22 distribution and tissue penetration. Reflecting this

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- 1 greater than 30 percent of the composition of gut
- 2 microbiota and as highlighted by the red box on the
- 3 slide, domination by gram-negative pathogens of
- 4 proteobacteria, but bacteria was a predictor of
- 5 subsequent gram-negative bacteremia. Although not
- 6 highlighted, you can also see that enterococcus
- 7 domination was a predictor for vancomycin-resistant
- 8 enterococcus or VRE bacteremia. Next slide, please.
- 9 Also from the same study, we can see
- 10 how receipt of fluoroquinolones was normally
- 11 protective against intestinal domination caused by
- 12 gram-negative bacteria or proteobacteria with a hazard
- 13 ratio of 0.09 shown in the right columns. Next slide,
- 14 please.
- Finally, from another study of 234
- 16 hematopoietic stem cell transplant recipients, 17 or
- 17 31 percent of the 54 who were colonized with
- 18 fluoroquinolone-resistant Enterobacterales developed
- 19 gram-negative bloodstream infection despite
- 20 fluoroquinolone prophylaxis, compared to only two or 1
- 21 percent of the 180 who were not so colonized. Next
- 22 slide, please.

- 1 tissue penetration, fluoroquinolones have increasingly
- 2 recognized toxicity. Despite their high absorption,
- 3 they do achieve high fecal levels. However,
- 4 resistance when it develops commonly leads to
- 5 relatively high minimum inhibitory concentrations or
- 6 MICs that likely exceed fecal levels.
- 7 Finally, although initially thought to
- 8 have little impact on anaerobic microbiota and the gut
- 9 microbiome, the selection of resistance in key
- 10 anaerobes and microbiome disruption are both now
- 11 increasingly recognized. Next slide, please.
- This brings us to what may be specific
- 13 attributes that future decolonization should possess.
- 14 First, direct acting agents such as small molecules
- 15 should have a narrow microbiological spectrum targeted
- 16 to specific pathogens or groups of pathogens and
- 17 limited body site distribution. Together these
- 18 attributes may improve drug safety and reduce
- 19 collateral damage to the human microbiome. Examples
- 20 include non-absorbable narrow-spectrum agents for
- 21 enteral, topical, or other local applications.
- 22 Second, agents and strategies should

- 1 have favorable pharmacokinetics to reduce emergence of
- 2 resistance through local evolution. For example,
- 3 applications should achieve high drug levels relative
- 4 to the minimum inhibitory concentration or even the
- 5 bactericidal concentration.
- 6 Ideally, agents should be unlikely to
- 7 evoke cross resistance to clinically important
- 8 antibiotics used for treatment of infection usually
- 9 through markedly different mechanisms of action. For
- 10 example, antiseptics are generally less likely to
- 11 evoke cross resistance to therapeutic antimicrobials,
- 12 although co-selection may still occur.
- We will want to say more about
- 14 leveraging colonization resistance afforded by the
- 15 human microbiome, and finally we need to think about
- 16 the durability of effect beyond duration of
- 17 application. For example, phage or live
- 18 biotherapeutics may expend -- extend duration of
- 19 decolonization or colonization resistance through
- 20 their replication. Next slide, please.
- 21 Current and future product categories
- 22 are listed here along with some examples. These span

- rage.
- 1 recurrent C. difficile infection under FDA enforcement 2 discretion. However, this enforcement discretion does
- 3 not extend to FMT use specifically for decolonization
- 4 or pathogen reduction. Under development are drugs
- 5 such as pathogen reduced or otherwise processed FMT or
- 6 derivatives, also more defined microbiota consortia.
- 7 Finally, phage is a promising avenue
- 8 for decolonization given its potential to be
- 9 relatively narrow spectrum and propagate, possibly
- 10 extending its duration of action. Next slide, please.
- 11 There is a central role for the human
- 12 microbiome and colonization resistance that should be
- 13 considered in all decolonization strategies. The
- 14 microbiome resist colonization by pathogens via
- 15 several mechanisms shown here, including the direct
- 16 inhibition via naturally produced molecules such as
- 17 bacteriocins and metabolites.
- 18 Metabolites and protein messaging from
- 19 the microbiome assist the host by maintaining the
- 20 mucosal barrier that prevents invasion and participate
- 21 in cross talk with the host to favorably modulate the
- 22 host immune system. Finally, the normal microbiome

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- 1 various compositions and modes of action. Mupirocin
- 2 is an example of a small molecule agent, as are the
- 3 agents used for gut decontamination. Bacteriocins are
- 4 proteins produced by bacteria that inhibit or kill
- 5 pathogens and along with local application of
- 6 monoclonal antibodies can be quite narrow in spectrum.
- 7 Lysostaphin is an example of a
- 8 bacteriocin that has been studied over the past 20
- 9 years with several notable development advancements,
- 10 but yet to be made clinically available. Topical
- 11 antiseptics or decontaminating agents such as alcohol
- 12 or chlorhexidine are used in combination with other
- 13 agents to decolonize. There are various drugs under
- 14 development that act indirectly to decolonize or
- 15 prevent colonization by protecting the microbiome from
- 16 antibiotics, for example, an activated charcoal
- 17 product to absorb antibiotics or beta-lactamase enzyme
- 18 to destroy antibiotics that may make their way into
- 19 the GI tract.
- 20 In addition, there are microbiome
- 21 restoratives such as fecal microbiota transplantation
- 22 or FMT which is currently in clinical use for

- 1 utilizes nutrients in the microenvironment, denying
- 2 the pathogen's use of those same nutrients. Next
- 3 slide, please.
- 4 The powerful effect of the human
- 5 microbiome in providing colonization resistance may be
- 6 grasped from early data such as this, comparing
- 7 patients who had their recurrent Clostridioides
- 8 difficile infections managed via fecal microbiota
- 9 transplantation versus usual antibiotics. Though this
- 10 was a prospective observational study, it was not
- 11 randomized. However, propensity matching was used to
- 12 make the cohort more comparable.
- 13 As highlighted in the red boxes on this
- 14 slide, in the 90 days following FMT or antibiotics for
- 15 management of recurrent C. difficile infections,
- 16 patients treated with FMT were much less likely to
- 17 develop bloodstream infections, had shorter
- 18 hospitalizations, and overall improved survival. Next
- 19 slide, please.
- 20 This suggests that whatever methods are
- 21 used to decolonize or pathogen reduce, they should
- 22 either replicate essential components of the natural

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 $$\operatorname{Page}\,58$$  1 functions of the microbiome or spare, protect, or

- 2 restore the microbiome. I will further point out that
- 3 the human microbiome is part of a larger microbial
- 4 ecology and we at CDC are very aware of this. I
- 5 encourage the audience to read about this at the link
- 6 shown to the bottom of this slide and listen for Dr.
- 7 Cal Ham's comments later this morning about how we
- 8 have considered this in regard to increasing
- 9 chlorhexidine use. Next slide, please.
- Finally, just a few notes on how a
- 11 tolerable safety margin may be impacted by local
- 12 versus systemic body site distribution of a drug and
- 13 targeted versus risk based implementation strategies.
- 14 Obviously, local versus systemic body site
- 15 distribution limits and end-organ exposure to
- 16 potential toxicities. However, the tradeoff is that
- 17 the locally acting agent may have a slower onset of
- 18 action, for example, waiting for GI motility to bring
- 19 a non-absorbed antibiotic to the active site in the
- 20 large bowel.
- 21 Meanwhile there are targeted versus
- 22 risk-based strategies to apply decolonization and

1 Still, some decolonization strategies

- 2 may have inherently slower onset. For example, when
- 3 selective digestive decontamination was extended to a
- 4 multi-country study across Europe, its effectiveness
- 5 may have been compromised by the removal of the third
- 6 generation cephalosporin from the regimen that
- 7 normally protected patients while the oral agents
- 8 transferred to the gut and began to protect through
- 9 direct decolonization and pathogen reduction.
- Finally, one needs an intervention that
- 11 is durable for the duration of increased risk and
- 12 overall we need more durable decolonization
- 13 strategies. Although not an example of HAI
- 14 prevention, the main reason that prepartum
- 15 decolonization versus intrapartum antibiotics was
- 16 historically not pursued as a means of Group B strep
- 17 prophylaxis of early onset neonatal bacteremia is
- 18 because durable decolonization strategies were not
- 19 available. Next slide, please.
- 20 So this concludes my comments to you
- 21 today. Although many of these take home points can be
- 22 made into standalone presentations, I've tried to span

1 a broad horizon of our current state and future needs

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- 1 pathogen reduction. Targeted application involves
- 2 rapid screening for colonization and directing
- 3 decolonizing and pathogen reduction therapy based on 3
- 4 that. The results in -- this results in a generally
- 5 smaller population being exposed to the decolonizing
- 6 therapy.
- 7 In contrast, risk-based strategies
- 8 focus on specific patient risk factors to minimize the
- 9 population being decolonized. While targeted
- 10 application would appear to be favorable from a risk-
- 11 benefit standpoint, there can be serious
- 12 implementation challenges to screening for
- 13 colonization. Next slide, please.
- 14 In addition to tailoring interventions
- 15 to safety considerations, one needs to tailor to
- 16 achieve effectiveness. Here, one needs to think about
- 17 the onset of action in the intervention and will it be
- 18 fast enough to protect the patient as they experience
- 19 increased risk. If it is to be a targeted application
- 20 and the patient has increased risk during the
- 21 screening process, the turnaround on that screening
- 22 needs to be also considered.

- 2 in decolonization strategies. Thank you.
- 3 DR. HEIDI SMITH: Thank you for that
- 4 presentation. Our next speaker will be Maroya Walters
- 5 who is going to be talking about Multidrug-resistant
- 6 Gram-negative Bacilli, Epidemiology and Decolonization
- 7 Considerations. Dr. Walters is an epidemiologist and
- 8 leads the antimicrobial resistance team in the
- 9 Prevention and Response Branch in the CDC Division of
- 10 Healthcare Quality Promotion. Her interests include
- 11 strategies to prevent the spread of multidrug-
- 12 resistant bacteria, especially carbapenem-resistant
- 13 gram-negative bacilli, and outbreak response. Dr.
- 14 Walters, thanks for your presentation.
- DR. MAROYA WALTERS: Good morning.
- 16 Next slide, please.
- 17 I am leading off four pathogen focused
- 18 presentations that will each cover epidemiology,
- 19 asymptomatic colonization, and decolonization and
- 20 pathogen reduction approaches for an organism or group
- 21 of organisms. Before delving into the details of
- 22 multidrug-resistant gram-negative bacilli, I want to

- 1 emphasize key areas of need for prevention. These
- 2 include developing novel approaches for decolonization
- 3 and pathogen reduction, primarily focusing on the
- 4 gastrointestinal tract but potentially including other
- 5 sites and high risk population, and symptomatic
- 6 evaluation of these approaches to understand their
- 7 impact on colonization, infection, and transmission.
- 8 Among decolonization and source control
- 9 measures currently under investigation, the
- 10 heterogeneity and how decolonization approaches are
- 11 assessed and in what populations, the use of different
- 12 endpoints to establish decolonization, and the lack of
- 13 control groups in some studies compromises our ability
- 14 to evaluate these approaches and move forward. Next
- 15 slide. Next slide.
- 16 Gram-negative bacilli encompass a large
- 17 number of organisms that cause a diverse array of
- 18 infection. They are responsible for approximately
- 19 one-third of all healthcare-associated infections
- 20 reported to the national Healthcare Safety Network.
- 21 Among these, most infections are associated with
- 22 Enterobacterales species and the lactose non-

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- 1 fermenters, pseudomonas and acinetobacter. Next
- 2 slide.
- 3 Today, I will focus on the four
- 4 healthcare-associated multidrug-resistant gram-
- 5 negative bacilli listed by CDC as urgent or serious
- 6 threats. These are carbapenem-resistant and extended-
- 7 spectrum beta-lactamase producing Enterobacterales
- 8 which are enteric organisms and multidrug-resistant
- 9 Pseudomonas aeruginosa and carbapenem-resistant
- 10 Acinetobacter, which are non-enteric organisms.
- I want to note that Enterobacterales is
- 12 a taxonomic order that represents over 70 different
- 13 genera. Some of the genera most often identified in
- 14 clinical microbiology laboratories are listed on this
- 15 slide. Next slide.
- And although they represent a diversity
- 17 of organisms, these MDR gram-negative bacilli have
- 18 several common characteristics. They are
- 19 opportunistic pathogens that can colonize multiple
- 20 mucosal surfaces such as the gastrointestinal tract,
- 21 lung, and wound, contributing to the variety of
- 22 infections with which they are associated. In

1 age o

- 1 healthcare settings, these are transmitted by a direct
- 2 and indirect contact with infected or colonized
- 3 individuals or the contaminated healthcare
- 4 environment. And finally, horizontal transfer of
- 5 resistance elements plays an important role in
- 6 facilitating spread of these organisms. Next slide.
- 7 There are also important
- 8 epidemiological differences among these organisms,
- 9 including between ESBL producing and carbapenem
- 10 resistant Enterobacterales. ESBLs are endemic in the
- 11 United States and approximately half of cases occur in
- 12 community dwellers who have not had recent
- 13 hospitalization, long-term care stays, or invasive
- 14 procedures. Risk factors in the community include
- 15 recent antibiotic therapy and international travel,
- 16 and food and water are increasingly recognized
- 17 reservoirs.
- 18 In contrast CRE are still emerging in
- 19 the United States. CRE primarily occur in patients
- 20 who have extensive healthcare exposures. Indwelling
- 21 devices, severe underlying illness, long-term care
- 22 facility admission, and antibiotic exposure are all

- 1 associated with CRE acquisition. Patient to patient
- 2 transmission accounts for the majority of CRE
- 3 acquisitions, although environmental reservoirs such
- 4 as healthcare facility wastewater plumbing also
- 5 contribute. Next slide.
- 6 A distinguishing feature of MDR-P.
- 7 aeruginosa and carbapenem-resistant acinetobacter is
- 8 the ability to form biofilm, which contributes to
- 9 colonization of indwelling medical devices, persistent
- 10 wound and respiratory tract colonization, and the
- 11 contamination of shared medical equipment. Risk
- 12 factors are similar to those for CRE.
- 13 Infections occur almost exclusively in
- 14 patients with substantial healthcare exposure,
- 15 including in patients with chronic underlying
- 16 conditions resulting in dysbiosis, such as cystic
- 17 fibrosis. And although I won't address cystic
- 18 fibrosis patients specifically, I want to note that
- 19 they are an important group to include when discussing
- 20 P. aeruginosa colonization and infection, as shown on
- 21 my supplementary side, and we will hear from Dr.
- 22 Whitney Brown of the CF Foundation later this morning.

Page 66 Page 68 1 Intrinsic resistance of these non-1 slide. 2 2 enteric gram-negatives combined with the remarkable Now let's look more closely at the 3 characteristics of colonization. The gastrointestinal 3 ability to acquire new resistance mechanisms means 4 that there are limited treatment options despite the 4 tract is the primary and Enterobacterales colonization 5 many new antibiotics for gram-negatives that have 5 site, although MDR Enterobacterales can also be found 6 recently come to market. Next slide. 6 elsewhere on the body of colonized patients including Overall, how common are MDR gram-7 on the skin. Estimates for the duration of 8 negative bacilli? This graph shows the number of 8 colonization vary. Factors that contribute to this 9 clinical cultures with MDR gram-negative identified in 9 variability include differences in patient 10 populations, decolonization criteria, and laboratory 10 hospitalized patients in 2019 and the 90-day 11 attributable mortality. Case numbers vary 11 testing approaches. 12 substantially from 6,000 cases of carbapenem-resistant 12 Despite the heterogeneity in the exact 13 acinetobacter to over 194,000 cases of ESBL producing 13 estimate, colonization is generally prolonged, with 14 one meta analysis estimating that 35 percent of 14 Enterobacterales. 15 colonized individuals remained colonized with ESBL 15 The number of cases should not be 16 confused with relative importance as these organisms 16 Enterobacterales or CRE one year after initial 17 are in different stages of emergence and the 17 detection. Median time to decolonization or negative 18 culture in three exemplar studies ranged from 144 to 18 carbapenem-resistant gram-negatives are associated 19 with limited treatment options and higher mortality 19 295 days. In general, community dwellers are found to 20 relative to the total number of cases than ESBLs. 20 be colonized at higher rates and more rapidly than 21 Also, these cases are just the tip of the iceberg 21 those admitted to healthcare setting, possibly owing 22 because most individuals with gram-negative bacilli 22 to more rapid restoration of a healthy microbiome or Page 69 Page 67 1 are colonized, not infected. Next slide. 1 reduced risk of becoming recolonized. 2 Carbapenem-resistant gram-negatives And some strains and organisms are 3 have been the focus of targeted public health 3 associated with increased duration of colonization, 4 detection, response, and prevention efforts in 4 including certain strains associated with epidemic 5 healthcare settings. Perhaps in part due to these 5 spread such as ESBL producing ST131 E. coli. Next 6 efforts, during 2017 to 2019, cases of carbapenem-6 slide. 7 resistant acinetobacter among hospitalized patients 7 Colonization with MDR Enterobacterales 8 is strongly associated with increased risk of 8 remained steady while cases of CRE and MGR-P. 9 aeruginosa declined. 9 infection with the highest risk among intensive care 10 10 unit patients. In studies of ICU patients, those who In contrast, ESBL-producing 11 Enterobacterales increased, illustrating challenges in 11 were CRE colonized at admission had two- to tenfold 12 controlling spread once these pathogens move into 12 higher risk of infection than those who were not 13 community settings. Since ESBLs and CRE encompass the 13 colonized. 14 14 same organisms with spread driven by mobile resistance In another study, 95 percent of ESBL 15 Enterobacterales infections in ICU patients occurred 15 elements, the trajectory of ESBL Enterobacterales 16 could presage the future for CRE in the absence of new 16 in those with a history of colonization. The risk of 17 approaches to prevent transmission. Next slide. 17 CRE infection among colonized hospitalized patients is 18 And this is especially important in 18 substantial. In a meta analysis, 16.5 percent of CRE 19 light of case trajectories during the COVID-19 19 colonized patients were estimated to develop 20 pandemic during which we observed increases in 20 subsequent CRE infection. The mortality in patients 21 carbapenem-resistant acinetobacter cases and halting 21 who develop infection is over 30 percent. As Dr. 22 of prior declines for CRE and MDR-P. aeruginosa. Next 22 Jernigan described earlier, not just the presence of

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1 the organism, but the abundance plays a role in

2 pathogenesis.

3 Among long-term acute care hospital

4 patients colonized with KPP producing Klebsiella

5 pneumoniae, a type of CRE, higher abundance in the

6 gastrointestinal tract was independently associated

7 with increased risk of bacteremia with this organism,

8 reinforcing the concept that reducing organism burden 8 bathing, contact isolation, and healthcare personnel

9 even without complete eradication has potential

10 benefit. Next slide.

11 In contract to MDR Enterobacterales,

12 there is no gold standard screening site for MDR-P.

13 aeruginosa or carbapenem-resistant acinetobacter.

14 These bacteria can colonize the skin, upper and lower

15 respiratory tract, wounds, and digestive tract. The

16 figure illustrates the wide range of reported

17 sensitivities for detection of carbapenem-resistant A.

18 baumannii at different body sites.

19 Similar to MDR Enterobacterales,

20 colonization can be prolonged. One study found that

21 17 percent of patients with a prior carbapenem-

22 resistant A. baumannii clinical culture remained

1 transmission to other patients, as Dr. Jernigan so 2 nicely illustrated. In a study of long-term acute

3 care hospitals in Chicago, which had achieved a

4 greater than 30 percent reduction in KPC-producing

5 Klebsiella pneumoniae prevalence and infections after

6 implementing a bundle of prevention intervention that

7 included active surveillance, daily chlorhexidine

9 education, a 1 percent increase in colonization

10 pressure was associated with a 2 percent increase in

11 acquisition risk.

12 The figure shows that if colonization

13 pressure increases, so do the odds of KPC acquisition,

14 even in settings where intensive infection control

15 measures have been implemented. Next slide.

16 These characteristics can lead to very

17 high prevalence of patients colonized with multidrug-

18 resistant organisms, especially in high acuity, long-

19 term care settings. This is a schematic of the

20 ventilator unit of a skilled nursing facility in which

21 each circle is a resident. The purple circles

22 represent patients colonized only with the yeast

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1 colonized after six months, although as the author

2 stated, this is likely an underestimate due to the low

3 sensitivity of screening methods used.

4 Among hospitalized kidney transplant

5 patients, carbapenem-resistant P. aeruginosa

6 colonization persisted for a median 42 days. Next

7 slide.

8 Like for MDR Enterobacterales,

9 colonization with acinetobacter and pseudomonas

10 typically proceeds infections with the same strain

11 with higher risk of infection and higher acuity

12 patients. ICU patients with carbapenem-resistant A.

13 baumannii bloodstream infections were colonized with

14 the same strain prior to developing infections, and

15 among patients colonized with P. aeruginosa at

16 admission, 23 to 43 percent developed infection during

17 their hospitalization and their risk of having a

18 clinical culture with P. aeruginosa was six times

19 higher than those who were not colonized at admission.

20 Next slide.

21 Colonization is not only a risk for

22 infection in the colonized individual, but a risk for

1 Candida auris, which Dr. Sexton will cover later this

2 morning, and the other colors represent residents

3 colonized with different combinations of carbapenem-

4 resistant organisms, some of whom also carry C. auris.

5 Note the high prevalence which leads to

6 sustained transmission and creates a reservoir that,

7 through patient sharing, can amplify spread throughout

8 healthcare facilities in a region. Next slide.

9 Multiple products have been assessed

10 for pathogen reduction or decolonization of MDR gram-

11 negative bacilli and I have attempted to summarize

12 them in this table. However, there are currently no

13 FDA approved decolonization agents for these

14 organisms. Skin antisepsis with chlorhexidine,

15 abbreviated CHG on the slide, has been found to reduce

16 skin concentrations of CRE and may also reduce the

17 skin burden of carbapenem-resistant acinetobacter,

18 which theoretically can prevent infections and reduce

19 transmission.

20 In the next presentation Dr. Ham will

21 highlight the success of chlorhexidine bathing for

22 preventing gram-positive infection. However, it's

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- 2 concentrations of chlorhexidine are needed to reduce
- 3 the growth of gram-negatives compared to gram-

1 important to note that substantially higher

- 4 positives, and these may be difficult to achieve in
- 5 clinical practice.
- 6 This may be in part why in two meta
- 7 analyses of chlorhexidine bathing in ICU patients,
- 8 this practice was not found to impact gram-negative
- 9 infection. The use of non-absorbable oral antibiotics
- 10 for selective digestive decontamination during periods
- 11 when patients are at high risk of infection such as in
- 12 the ICU was described by Dr. McDonald. Across
- 13 multiple randomized controlled trials, SDD reduced the
- 14 gastrointestinal carriage rate of ESBL
- 15 Enterobacterales, CRE, and carbapenem-resistant
- 16 acinetobacter.
- 17 The effect is temporary, suggesting
- 18 that this may serve more to suppress these organisms
- 19 than to eliminate them from the gut. SDD fails to
- 20 meet several of the specific attributes of a
- 21 decolonizing agent through its use of therapeutic
- 22 agents, typically polymyxins and aminoglycosides, with

Page /

- 1 antibiotic resistant organisms which included both VRE
- 2 and MDR Enterobacterales. A small number of reports
- 3 in case series have documented decolonization of
- 4 carbapenem-resistant P. aeruginosa and acinetobacter
- 5 following FMT, suggesting that this strategy may not
- 6 be limited to the enteric gram-negatives.
- 7 However, more well controlled studies
- 8 including randomized controlled trial with clearly
- 9 defined endpoints for decolonization or pathogen
- 10 reduction are needed. Finally, the literature
- 11 contains several case reports of successful treatment
- 12 of acinetobacter, P. aeruginosa, and Enterobacterales
- 13 infections with bacteriophage under compassionate use,
- 14 including cure of wound infections and eradication of
- 15 P. aeruginosa from cystic fibrosis patient lungs.
- 16 This may be a promising approach for decolonization
- 17 due to the narrow spectrum and durability of phage
- 18 action. Next slide.
- 19 So where do we go from here? First,
- 20 let's recap where we are. These are highly resistant
- 21 organisms with limited treatment options.
- 22 Colonization increases the risk of infection and

- 1 the potential to both evoke resistance to these
- 2 therapies and to disrupt the intestinal microbiome.
- The next two approaches, probiotics and
- 4 fecal microbiota transplant are intestinal microbiome
- 5 restoratives. By restoring the natural colonization
- 6 resistance of a healthy microbiome, these modalities
- 7 could potentially protect against colonization with
- 8 MDR gram-negatives or function as decolonization or
- 9 pathogen reduction agents.
- 10 Among two randomized controlled trials
- 11 in which a probiotic was administered to hospitalized
- 12 patients, MDR Enterobacterales acquisition and loss
- 13 were not altered. Similarly, randomized controlled
- 14 trials to assess decolonization of MDR
- 15 Enterobacterales carriers did not show reductions in
- 16 carriage after probiotic treatment.
- 17 The current evidence for fecal
- 18 microbiota transplant assessed across multiple case
- 19 studies and primarily uncontrolled case series is more
- 20 optimistic. A meta analysis of three studies
- 21 estimated that one month post fecal microbiota
- 22 transplant, 46 percent of patients decolonized

- 1 creates a reservoir for transmission to other
- 2 patients. Current infection control methods slow but
- 3 do not stop transmission, as illustrated in our LTACH
- 4 example.
- 5 Therefore, MDR gram-negative
- 6 decolonization or pathogen reduction has the potential
- 7 to positively impact both the individual and the
- 8 population by reducing infections and preventing
- 9 transmission, but there are currently no FDA-approved
- 10 agents for these purposes.
- Hence there is a critical need for
- 12 novel approaches that satisfy the specific attributes
- 13 of decolonization and pathogen reduction agents and to
- 14 systematically evaluate these approaches including
- 15 randomized control trials in order to understand their
- 16 effect on colonization, infection, and transmission.
- 17 Thank you.
- 18 DR. HEIDI SMITH: Thank you for that
- 19 presentation. And so we're going to move on to our
- 20 last presentation of the first half of this session.
- 21 Cal Ham is going to be speaking on Gram Positives:
- 22 Staph aureus and Vancomycin-resistant Enterococci.

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- 1 Dr. Ham is the deputy lead of the Antimicrobial
- 2 Resistance Team in the Division of Healthcare Quality
- 3 Promotion at CDC. He serves there as a subject matter
- 4 expert on antibiotic-resistant gram-positive bacteria.
- 5 He oversees a broad portfolio of projects focused on
- 6 the prevention of antimicrobial-resistant pathogens in
- 7 the healthcare setting. On to your presentation, Dr.
- 8 Ham. Thanks.
- 9 DR. CAL HAM: Good morning, everyone.
- 10 Thank you very much for that introduction and I am
- 11 pleased to be speaking with you all today about
- 12 decolonization and pathogen reduction for two
- 13 important gram-positive bacteria, Staphylococcus
- 14 aureus and vancomycin-resistant Enterococci. I have
- 15 no financial disclosures to report.
- 16 So as with the previous talk, I will
- 17 begin today with the description of key areas of need
- 18 for prevention. For Staphylococcus aureus,
- 19 decolonization and pathogen reduction strategies have
- 20 proven effective as demonstrated by a number of large
- 21 clinical trials; however, despite these excesses,
- 22 there remains work to be done first in evaluating and

- 1 exposures. However, transmission of a highly fit
  - 2 clone, USA300 in the community subsequently led to
  - 3 large increases in infections among those without
  - 4 healthcare-related risk factors in the United States.
  - 5 Staph aureus also remains a major cause
  - 6 of healthcare-associated infections, with it being the
  - 7 number one cause of surgical site infections and
  - 8 overall the second most common cause of HAIs in
  - 9 hospitals. Next slide, please.
  - Diving a little bit deeper into the
  - 11 epidemiology of MRSA, in 2020 there were an estimated
  - 12 279,300 MRSA infections among hospitalized patients in
  - 13 the United States, representing a significant burden
  - 14 of disease. And as with other HAIs, the COVID-19
  - 15 pandemic had a major impact on hospital-onset MRSA
  - 16 infections.
  - 17 This table is taken from a recent
  - 18 publication and shows national estimates of hospital
  - 19 onset MRSA bacteremia by quarter in 2020 compared to
  - 20 respective quarters in 2019. You can see that in
  - 21 quarter one 2020, hospital onset MRSA bacteremia
  - 22 estimates were down 7.2 percent compared to quarter

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- 1 expanding decolonization and pathogen reduction
- 2 strategies for staph aureus to additional settings and
- 3 high risk populations, and second in the development
- 4 of additional products and novel approaches that can
- 5 be incorporated into our prevention arsenal.
- 6 In contrast, while we have seen great
- 7 successes in decolonization and pathogen reduction for
- 8 staph aureus, for VRE there are currently no approved
- 9 decolonization products. As such, there is a great
- 10 need to develop and investigate promising and novel
- 11 agents with the potential for large impacts on patient
- 12 outcomes. Next slide, please. And next slide,
- 13 please.
- 14 So staph aureus is a common cause of
- 15 infections in both community and healthcare settings.
- 16 We categorize staph aureus based on resistance
- 17 patterns into two types: methicillin susceptible
- 18 staph aureus or MSSA and methicillin resistant staph
- 19 aureus or MRSA, which is commonly resistant to many
- 20 commonly used first line antibiotics.
- When MRSA first emerged, it was
- 22 primarily identified in patients with healthcare

1 one 2019.

- 2 However, this dramatically changed
- 3 beginning in quarter two 2020 with increases noted in
- 4 each subsequent quarter compared to their respective
- 5 2019 quarters, highlighting the need for continued
- 6 prevention efforts to combat the increases we have
- 7 seen in these invasive infections. Next slide,
- 8 please.
- 9 Continuing with some background
- 10 information, staph aureus is transmitted by direct or
- 11 indirect contact with infected or colonized
- 12 individuals or contaminated surfaces. The primary
- 13 site of colonization is the nares, but it can also
- 14 colonize other anatomic sites including the axilla,
- 15 groin, perineum and pharynx.
- 16 It is estimated that approximately one-
- 17 third of the population is colonized with staph aureus
- 18 and about 1 percent with MRSA; although, this MRSA
- 19 estimate is based on older data and may be higher now,
- 20 particularly in certain high risk groups such as long-
- 21 term care facility residents, healthcare personnel,
- 22 and individuals with extensive healthcare exposures.

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1 The duration of colonization by MRSA is
2 highly variable, but can be prolonged. Reports in the
3 literature range from weeks to years; however, one
4 systematic review that I reference here reported a
5 median duration of MRSA colonization of 88 weeks.
6 And finally, as has been mentioned in
7 previous talks, colonization is a driver of
8 transmission but also increases the risk of developing
9 an infection. In fact, among hospitalized patients
10 who are newly colonized with MRSA, about 15 percent
11 will progress to clinical infection. Next slide,
12 please.

11 will progress to clinical infection. Next slide,
12 please.
13 Next, I'll provide some background
14 information on VRE which like staph aureus is a common
15 cause of HAIs. In 2020, there were an estimated
16 50,300 infections caused by VRE among hospitalized
17 patients in the United States. VRE is also spread by
18 direct or indirect contact with infected or colonized
19 individuals or contaminated surfaces; however, I do

21 plays a much greater role in VRE transmission than for22 staph aureus. Next slide, please.

1 Unlike staph aureus, the primary site 2 of VRE colonization is the gastrointestinal tract and 3 it can occasionally colonize the urinary tract. VRE

20 want to highlight that environmental contamination

4 colonization among hospitalized patients is common and

5 one meta analysis found that the prevalence of

6 colonization at time of admission to an ICU was 12.3

7 percent among U.S. patients.

8 Similar to MRSA, the duration of9 colonization for VRE is highly variable but ranges

10 from weeks to years with a median of 26 weeks. And

11 risk factors include prolonged healthcare exposures,

12 invasive devices, antibiotic receipt, and long-term

13 care residence.

14 As with MRSA, colonization by VRE can

15 drive transmission but also increases the risk of

16 developing an infection. Certain groups at high risk

17 for progression to clinical infection include cancer

18 patients where an estimated one out of eight who are

19 colonized go on to develop a VRE bloodstream

20 infection, and ICU patients where rates of progression

21 to clinical infection may also be very high. Next

22 slide, please. And next slide, please.

Page 8-

1 So for MRSA, we are fortunate to have a

2 number of different decolonization and pathogen

3 reduction agents available. Decolonization or

4 pathogen reduction is typically done using an

5 intranasal anti-staphylococcal agent in combination

6 with a topical antiseptic. For intranasal agents,

7 mupirocin, which is an antibiotic, has been most

8 commonly investigated, but there is also iodophor or

9 povidone iodine and alcohol-based agents that have

10 been employed.

For topical antiseptics, chlorhexidine gluconate is the most commonly used and is applied

13 directly to a patient's skin. I did want to note that

14 a mupirocin and chlorhexidine decolonization regimen

15 has been shown to be superior to an iodophor

16 chlorhexidine based regimen for staph aureus

17 prevention based on results from the Swap Out Trial.

And while there have been reports in

19 mupirocin resistance in the literature which bears

20 careful monitoring, no significant increases in

21 mupirocin resistance were observed in a large clinical

22 trial for decolonization, the reduce MRSA trial, which

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1 I'll talk about more in just a minute.

We have also investigated chlorhexidine

3 resistance in collaboration with academic partners and

4 in a convenience sample of just over 500 antibiotic-

5 resistant isolates, we did not observe increases in

6 chlorhexidine MICs over time from 2005 to 2019.

7 In a separate evaluation at healthcare

8 facilities with longstanding chlorhexidine patient

9 bathing, no increases in chlorhexidine

10 nonsusceptibility or deleterious changes to microbial

11 ecology were identified in the chlorhexidine bathing

12 period compared to the pre-chlorhexidine bathing

13 period.

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Now the existing intranasal agents

15 listed on the slide have a broad spectrum of activity

16 which can affect the entire nasal microbiota, but are

17 there ways that we can be more targeted with nasal

18 decolonization? One potential class of decolonizing

19 agents that are often narrow spectrum are bacteriocins

20 which are antibacterial peptides that are produced by

21 competing bacteria, including in the nears.

One of these, lysostaphin, targets

- 1 staphylococcus species including staph aureus and has
- 2 shown promise in animal models. Other approaches such
- 3 as phage therapy and monoclonal antibodies targeting
- 4 staphylococcus protein A also show promise and have
- 5 narrow spectrum activity that is likely to have
- 6 minimal impact on the nasal microbiota.
- 7 In addition, further study of the nasal
- 8 microbiome itself and how other bacteria compete with
- 9 staph aureus in the nares may yield additional
- 10 decolonization targets. Next slide, please.
- 11 So next I'm going to spend a few
- 12 minutes talking about the evidence supporting
- 13 decolonization and pathogen reduction for staph aureus
- 14 to give you a sense of how successful these approaches
- 15 have been. One of the seminal trials that I'll go
- 16 into a bit of detail on is to Reduce MRSA Trial and
- 17 you'll hear more from the study's lead author Dr.
- 18 Susan Huang later today.
- 19 This study was supported by CDCs
- 20 Prevention Epicenters and was a cluster randomized
- 21 trial of 74 adult ICUs that involved three arms: Arm
- 22 1, which is what I'll call the routine care arm where

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- 1 in MRSA clinical cultures or all cause bloodstream
- 2 infections. However, for the targeted decolonization
- 3 arm, there was a 25 percent reduction in MRSA clinical
- 4 cultures and a 22 percent reduction in all cause
- 5 bloodstream infections, both of which were
- 6 statistically significant.
- 7 And for the universal decolonization
- 8 arm, there was an even greater impact with a 37
- 9 percent reduction in MRSA clinical cultures and a 44
- 10 percent reduction in all cause bloodstream infections,
- 11 both of which were statistically significant. These
- 12 large reductions, particularly those in the universal
- 13 arm are truly remarkable and demonstrate that
- 14 decolonization is one of the most effective prevention
- 15 tools we have available for staph aureus. Next slide,
- 16 please.
- Now, in addition to REDUCE MRSA, there
- 18 are several other studies which have evaluated the
- 19 impact of decolonization and pathogen reduction
- 20 interventions for staph aureus in various patient
- 21 populations and in the next two slides, I'll summarize
- 22 some of the key findings. While I can't discuss each

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- 1 patients were screened on admission to ICUs and MRSA
- 2 carriers were isolated; Arm 2, which was a which was a
- 3 targeted decolonization arm where they screened
- 4 patients on admission, isolated MRSA carriers, and
- 5 decolonized those who were MRSA positive with
- 6 intranasal mupirocin and chlorhexidine bathing; and
- 7 finally Arm 3 or the universal decolonization arm
- 8 where there was no screening on admission, but rather,
- 9 they decolonized all ICU patients with intranasal
- 10 mupirocin and chlorhexidine bathing as well as
- 11 isolating previously known in MRSA carriers.
- 12 It is important to note that practices
- 13 in Arm 1 where the standard of care during the
- 14 baseline period for all arms and therefore results
- 15 from this arm are an indication of the secular trend.
- 16 Next slide, please.
- Now, getting to the results which are
- 18 presented as reductions in outcomes observed during
- 19 the intervention period relative to the baseline
- 20 period. Statistically significant reductions are
- 21 noted by an asterisk. You can see that for the
- 22 routine care arm, there were no significant reductions

- 1 of these in detail, the main takeaway I want you to
- 2 have is that these interventions have proven
- 3 successful in reducing infections across a number of
- 4 different populations.
- 5 These included hospitalized patients
- 6 outside the ICU with indwelling devices, as shown in
- 7 the ABATE Infection Trial, MRSA carriers following
- 8 hospital discharge from Project CLEAR, nursing home
- 9 residents in the Protect Trial -- I've included some
- 10 updated results from that trial here -- surgical
- 11 patients as seen in studies from Bode et al. and
- 12 continuing to the next slide, the MARS Study and STOP
- 13 SSI, and finally neonatal ICU patients.
- 14 Again, the results from these studies
- 15 as well as several others, point to how impactful
- 16 decolonization and pathogen reduction strategies for
- 17 staph aureus can be, particularly for high risk
- 18 patients during high risk periods, such as during an
- 19 ICU admission, when indwelling devices are present, or
- 20 when undergoing high risk surgeries.
- 21 They have resulted in national
- 22 recommendations from both CDC and the Society for

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- 1 Healthcare Epidemiology of America or SHEA, and these
- 2 strategies have been widely implemented in acute care
- 3 hospitals with 37 percent of U.S. hospitals in 2021
- 4 reporting routine use of an intranasal anti-
- 5 staphylococcal agent in combination with chlorhexidine
- 6 bathing. Next slied, please.
- Now, for VRE, we have a very different
- 8 story. As I mentioned earlier, there are currently no
- 9 approved products for VRE decolonization. Now,
- 10 chlorhexidine bathing can be effective for pathogen
- 11 reduction, but will not impact colonization of the
- 12 gastrointestinal tract. Several other approaches have
- 13 been investigated and generally fall into the
- 14 categories of antibiotics, repurposing of other drugs
- 15 with activity against VRE, gut microbiome-modifying
- 16 therapies, or combination approaches.
- 17 In general, these have been small case
- 18 series or trials that have yielded mixed results, had
- 19 limited follow-up time, and commonly reported
- 20 colonization rebound. Next slide, please.
- Now, on the next two slides, I'll
- 22 highlight just a few findings from the literature for

- 1 its effectiveness. Next slide, please.
- 2 Next, it is known that certain
- 3 commensal bacteria inhibit VRE growth in the GI tract,
- 4 such as Barnesiella species which prevent intestinal
- 5 domination by VRE and may reduce the risk of
- 6 subsequent infection. As such, probiotics have been
- 7 investigated for MDRO decolonization including for
- 8 VRE.
- 9 These studies have shown mixed results
- 10 and I'll highlight one small randomized control trial
- 11 assessing VRE clearance following the use of
- 12 Lactobacillus rhamnosus GG, which showed 100 percent
- 13 clearance at four weeks in the treatment arm compared
- 14 to just 8 percent clearance in the control arm. I
- 15 will however note that another recently published
- 16 study showed no effect of Lactobacillus rhamnosus on
- 17 VRE clearance.
- 18 Finally, fecal microbiota
- 19 transplantation or FMT is a promising new approach
- 20 that may prove effective. However, as with other
- 21 approaches to VRE decolonization, many reports on FMT
- 22 have been case series and have shown mixed results.

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- 1 these different approaches. First, the use of
- 2 antibiotics for VRE decolonization has shown mixed
- 3 results with reports of poor tolerance and gut
- 4 microbiome disruption. Oral bacitracin is one of the
- 5 more commonly investigated and one review article
- 6 reported here -- sorry -- reported between 43 and 100
- 7 percent initial clearance. However, only 33 to 53
- 8 percent of individuals remained decolonized at three
- 9 weeks.
- 10 Another antibiotic, rampolanin, was
- 11 investigated in a small randomized control trial with
- 12 68 participants which showed 85 percent clearance at
- 13 day seven in the treatment arms compared to zero
- 14 present in the placebo arm. However, there were no
- 15 significant differences between treatment and placebo
- 16 arms at day 21.
- 17 In terms of repurposing other drugs
- 18 with activity against VRE, ebselen, a synthetic
- 19 organoselenium compound, has been demonstrated to have
- 20 potent activity against enterococcus in vitro, in a
- 21 mouse model reduced VRE fecal burden by 99 percent.
- 22 However, clinical trials are still needed to determine

- 1 One that I'll highlight here came from France where
- 2 they successfully decolonized seven out of eight
- 3 carriers during a hospital outbreak of VRE. Next
- 4 slide, please.
- 5 So to summarize, decolonization and
- 6 pathogen reduction for MRSA carriers has proven
- 7 successful with several large trials among different
- 8 populations demonstrating effectiveness which have
- 9 resulted in national recommendations. Universal
- 10 approaches such as universal decolonization of ICU
- 11 patients as was done in the REDUCE MRSA Trial also
- 12 have the potential to impact MSSA infections as well.
- 13 These decolonization and pathogen reduction strategies
- 14 play a major role in the prevention of staph aureus
- 15 infections.
- 16 However, as I pointed out earlier, we
- 17 still have more work to do both in terms of expanding
- 18 the use of these in populations where they have proven
- 19 to be effective, but also in evaluating their impact
- 20 in other high risk populations or settings. There is
- 21 also the need to investigate the effectiveness of
- 22 other agents for staph aureus decolonization, and

- 1 pathogen reduction and some promising new approaches
- 2 including bacteriocins, phage therapy, and the use of
- 3 monoclonal antibodies may add additional tools to our
- 4 prevention arsenal. Next slide, please.
- 5 For VRE, there remains a major need for
- 6 effective decolonization and pathogen reduction
- 7 regimens. While several strategies have been
- 8 investigated with mixed results, we need a more
- 9 systematic approach and larger clinical trials to
- 10 determine the effectiveness of these agents as well as
- 11 the development and evaluation of other novel
- 12 products.
- 13 Given the burden of VRE infections
- 14 among hospitalized patients, the development of
- 15 effective decolonization and pathogen reduction
- 16 regimens truly has the potential to greatly impact
- 17 patient outcomes in the United States. Next slide,
- 18 please.
- 19 Thank you very much, and I will turn it
- 20 back over to the moderators.
- DR. HEIDI SMITH: Thank you very much,
- 22 Dr. Ham, for that presentation. And I want to thank

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- 1 all the speakers for the first half of session one for
- 2 some great presentations and also for staying on
- 3 schedule. So we are on time to take a break. We will
- 4 be taking a break now and we'll be back at 10:25 for
- 5 the second half of session one. Thanks very much and
- 6 see you then.
- 7 (Break)
- 8 TIMOTHY BENSMAN: Welcome back
- 9 everyone. My name is Tim Bensman from FDA and I'll be
- 10 moderating the second half of the morning session.
- We're going to begin with Dr. Joe
- 12 Sexton who will present on the topic of Candida auris
- 13 colonization and the implications for public health.
- 14 Dr. Sexton is a microbiologist and a team lead for the
- 15 Mycotic Disease Branch Laboratory at CDC. Dr. Sexton
- 16 has specific subject matter expertise in the detection
- 17 and control of Candida auris including diagnostics,
- 18 colonization, transmission, and environmental control.
- 19 Dr. Sexton, the floor is yours.
- DR. JOE SEXTON: Good morning,
- 21 everyone. Thank you so much for tuning into this talk
- 22 and workshop. My name is Joe Sexton and I'm the team

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- 1 lead for the Mycotic Diseases Branch Laboratory at
- 2 CDC. I'm really grateful to be here today and have
- 3 fungi be included in this important conversation.
- 4 Like many bacterial pathogens, we're
- 5 also really concerned about increasing antimicrobial
- 6 resistance in fungi and healthcare-associated
- 7 infections. Today, I'm going to talk to you about
- 8 Candida auris, an emerging fungal pathogen of
- 9 increasing public health concern. Next slide, please.
- 10 Candida auris was first reported in
- 11 2009 but has rapidly spread across the globe and USA.
- 12 Using whole genome sequencing, we've learned that this
- 13 is not simply recent detection, but is true emergence
- 14 and essentially the spread of just a few highly clonal
- 15 groups or clades. Unlike most fungal pathogens,
- 16 Candida auris has proven to be unique in its ability
- 17 to heavily colonize patients' skin and cause outbreaks
- 18 in healthcare settings that are hard to control.
- 19 To date, there are no decolonization or
- 20 pathogen reduction strategies for Candida auris. In
- 21 2019, Candida auris was identified as an urgent threat
- 22 in CDC's 2019 AR Threat Report. Next slide, please.

- 1 I'd like to highlight that much of what
- 2 we know about Candida auris right now in the United
- 3 States is thanks to the AR Lab Network, seven highly
- 4 specialized public health laboratories who have the
- 5 unique capacity to provide C. auris colonization
- 6 screening which is performed by testing ESwabs
- 7 collected from the axilla, groin, and sometimes
- 8 interior nares. The AR Lab Network also performs
- 9 antifungal susceptibility testing and plays an
- 10 important role in helping us track AR. Next slide,
- 11 please.
- So why are we concerned about Candida
- 13 auris? I'm going to go through three main reasons.
- 14 First is antimicrobial resistance, high rates of
- 15 antimicrobial resistance, and for a little bit of
- 16 context I think it's important to appreciate that
- 17 because fungi are eukaryotic organisms like ourselves,
- 18 it is challenging to find unique drug targets that can
- 19 hurt the fungal pathogen without having side effects
- 20 on us. And for this reason, we really just don't have
- 21 a lot of antifungals to work with in the beginning and
- 22 that really makes antifungal resistance highly

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1 concerning to us.

2 Just to paint a picture of what we're

3 seeing with Candida auris, we're seeing that over 80

4 percent of isolates are resistant to one class of

5 antifungal. Over 25 percent of isolates in the United

6 States are resistant to two classes and we're really

7 concerned to now see isolates popping up that are

9 resistant to all three classes of antifuncials that are

8 resistant to all three classes of antifungals that are

9 currently available.

10 Colonization also amplifies the

11 problem. We're learning that 5 to 10 percent of

12 colonized patients go on to develop invasive

13 infections and of those we're seeing over 45 percent

14 mortality within the first 30 days. Candida auris

15 also causes large outbreaks in healthcare settings

16 that are hard to control and we see colonization

17 prevalence go very high. In some cases, it can -- in

18 some units it can be equal to or even greater than 70

19 percent of the patients are colonized by Candida

20 auris. Next slide, please.

21 Unfortunately, Candida auris cases are

22 increasing. This figure shows case counts from data

1 Candida auris is not easy under even normal

2 circumstances. Caring for colonized patients requires

3 increased resources to adhere to transmission based

4 precautions, enhance communication across units and

5 between other facilities, and investing in enhanced

6 IPC practices across the board.

7 One example includes special attention

8 to disinfectants. We learned early on that many

9 hospital disinfectants with general fungicidal claims

10 are often not effective against Candida auris. This

11 prompted a collaborative effort between CDC and EPA to

12 generate additional data and clarified guidance. This

13 resulted in the release of List P which is an easily

14 referenceable list of disinfectant products that have

15 met EPA's five log reduction performance thresholds

16 for Candida auris. We often get the question, how do

17 we de colonize patients.

18 It's often dissatisfying to have to

19 communicate that there's really not a lot of options

20 right now, and I think that one of the things that

21 we're concerned about is that we're hearing from

22 healthcare facilities that they're struggling to

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1 generated by the AR Lab Network as well as other

2 sources showing colonization screening cases in green

3 and the clinical cases in blue. I'd like to draw your

4 attention to early 2020 that coincides with the start

5 of the COVID-19 pandemic. As you can see, cases have

6 increased substantially during the pandemic. The

7 reasons for this are not fully understood, but are

8 likely related to increased patient movement during

9 the pandemic as well as other logistical challenges

10 experienced by healthcare facilities such as PPE

11 shortages, turnovers, and other challenges just doing

12 the work that they're trying to do. Next slide,

13 please.

14 So who gets colonized by Candida auris?

15 Known risk factors are actually pretty similar to

16 other MDROs, things like mechanical ventilation and

17 recent exposure to prior acute healthcare. Antibiotic

18 exposure is also a risk factor as well as systemic

19 fluconazole, a commonly used antifungal that C. auris

20 is typically resistant to. Next slide, please.

21 It's important to highlight that

22 providing healthcare for patients colonized with

1 transfer colonized patients out of their unit to the

2 appropriate level of care because some facilities and

3 units will not accept patients known to be colonized

4 by Candida auris. This means some patients are

5 getting stuck at the incorrect level of care, in some

6 cases for prolonged periods of time. Next slide,

7 please.

8 So what do we know, what tools do we

9 have? I think this is a good opportunity to

10 communicate something a little different between

11 Candida auris and some of the other pathogens we're

12 hearing about, simply because Candida auris is so new.

13 We still have a lot to learn. We don't have a large

14 body of literature to reference, but we have learned

15 certain things that I think are relevant and helpful

16 to this conversation.

17 One thing we've learned is that

18 environmental contamination can be extensive in the

19 healthcare environment around colonized patients and

20 C. auris can persist on inanimate surfaces for at

21 least weeks. So let's talk a little bit about what we

22 know about Candida auris colonization and how that

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1 relates to environmental contamination and subsequent

- 2 transmission. Next slide, please.
- 3 First we and others have noted very
- 4 high concentrations of Candida auris in the swabs
- 5 we've received for colonization screening. We're
- 6 talking about millions and even tens of millions of
- 7 viable cells in a single colonization swab. For those
- 8 who can't see the Y axis clearly, this figure is in a
- 9 logarithmic scale going up to 10 to the ninth CFUs per
- 10 swab. This was surprising to our lab. We actually
- 11 had to continually revise our laboratory methods to
- 12 incorporate additional serial dilutions to finally get
- 13 countable colonies. Next slide, please.
- 14 And perhaps not surprisingly, we've
- 15 also observed that patients with more Candida auris on
- 16 their skin also have more Candida auris in their
- 17 environment. Here on the left, you can see a look at
- 18 environmental contamination on the Y axis plotted
- 19 against skin colonization burden on the X axis,
- 20 showing the positive relationship between those two
- 21 variables.
- 22 On the right, you can see individual

1 auris colonization in the interior nares observed in

- 2 this study and corroborated by others, emphasizes the
- 3 importance of considering the interior nares in any
- 4 strategy intended to decolonize or reduce pathogen
- 5 burden. Next slide, please.
- 6 One interesting observation in the same
- 7 cohort of patients, the patients who were not
- 8 colonized by Candida auris tended to have mycobiome is
- 9 dominated by Malassezia. Malassezia is another yeast
- 10 species that is generally thought to be a part of a
- 11 normal healthy mycobiome. In contrast, in colonized
- 12 patients, C. auris was really dominating the mycobiome
- 13 and we saw very little Malassezia.
- 14 We certainly have a lot more to learn
- 15 about what a healthy fungal mycobiome looks like, but
- 16 these observations at minimum suggest further
- 17 investigation is warranted and additional insights
- would be relevant to considerations about how to
- 19 decolonize or reduce pathogen burden for Candida
- 20 auris. Thank you.
- 21 Unfortunately Candida or is
- 22 colonization appears to last a very long time and may

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- 1 patients organized along the X axis and the
- 2 concentration of C. auris detected on their left and
- 3 right handrails of their bed with a horizontal line,
- 4 showing the average between those two values. What
- 5 you can see is that the left and right handrails for a
- 6 given patient have remarkably similar levels of
- 7 Candida auris contamination, again indicating a common
- 8 source from the patient shedding to the environment.
- So we know that colonized patients can
- 10 serve as a reservoir and contribute to environmental
- 11 contamination in the healthcare setting. Next slide,
- 12 please.
- 13 So what else have we learned about
- 14 Candida auris colonization? This figure highlights a
- 15 study looking more comprehensively at what body sites
- 16 can be colonized in a cohort of 57 residents at a
- 17 ventilated skilled nursing facility that was
- 18 previously known to have high Candida auris
- 19 colonization prevalence. This study demonstrated C.
- 20 auris can colonize many body sites, literally from
- 21 head to toe.
- 22 In particular, the high frequency of C.

1 be indefinite without some kind of intervention. To

- 2 date, there are some patients that have been tracked
- 3 being colonized consistently for over four years now.
- 4 It probably can go longer, but this is the longest
- 5 that we've been able to track people to date. Thank
- 6 you.
- 7 So let's talk a little bit about CHG,
- 8 chlorhexidine, because again, we're still -- there's
- 9 still a lot more data to have, but there are patients
- 10 who are colonized with Candida auris that are
- 11 receiving CHG bathing as a part of care for other
- 12 MRDOs or other IPC interventions. However, we don't
- 13 have a lot of data that speaks to its efficacy against
- 14 Candida auris specifically.
- 15 In this work, CHG concentrations were
- 16 measured on patient skin and correlated with their
- 17 colonization status. Although colonization was less
- 18 common when CHG levels were greater than 625
- 19 micrograms per mil, this concentration was rarely
- 20 observed, suggesting it can be difficult to achieve
- 21 necessary CHG concentrations in practice. And of
- 22 course CHG bathing would not be expected to impact

Meeting Page 106 1 Candida auris populations in the interior nares. Next Healthcare facilities often ask us 1 2 slide, please. 2 about decolonization treatments and it's dissatisfying 3 3 and disappointing when we have to communicate that I'd also like to highlight that there 4 is some very interesting work happening right now with 4 there's just not a lot of options right now. Patients 5 mouse models and other new model systems including pig 5 colonized with Candida auris are increasingly stuck at 6 skin and other artificial models. This field is still 6 the wrong level of care because other facilities 7 young, but I think it's already producing interesting 7 refuse to accept them. 8 8 results. One study by Julie Segre's group shown on 9 the left indicated C. auris may be able to colonize 10 even the base of the hair follicles, which again, is 11 relevant to considerations of what it would take 11 think that further advancing and standardizing 12 technically to access Candida auris to effectively 13 decolonize or reduce burden. 14 14 please. The figure on the right shows 15 And so that -- with that, I'd like to 15 additional data from Mahmoud Ghannoum's group at Case 16 Western demonstrating that they were successful at

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17 achieving a stable colonization model and observed 18 pathogen reduction with an antifungal cream. I think 19 just highlighting that they were able to achieve 20 stable colonization is worth noting because that's 21 been a practical challenge for several groups 22 establishing these models.

And so there's a public health need for 9 decolonization or pathogen reduction strategies that 10 can specifically address C. auris colonization, and I 12 laboratory models to help evaluate new approaches will 13 be an important piece of that puzzle. Next slide, 16 give some special thanks in particular to the AR Lab 17 Network who've done a lot of work to help us keep 18 track of Candida auris. Of course, our colleagues in 19 the Division of Healthcare and -- Quality and 20 Promotion for collaborating with us so consistently on 21 Candida auris, many of which are presenting before and 22 after me. And I'd like to thank my home branch,

Others are also doing really 2 interesting work in this area, so this slide isn't 3 necessarily intended to be comprehensive, but I do 4 want to highlight while both of these studies were 5 done very well in independence, just to point out that 6 they did use different mouse models and for that it's 7 hard to kind of compare apples to apples and I think 8 I'm highlighting that because that's kind of a current 9 need I think in the field. Whether you're talking about a mouse 11 model, a skin model, or some other artificial model, 12 it will be helpful as the field grows to see consensus 13 develop around common model systems that can be 14 standardized to best support robust evaluations of 15 products before moving to patient populations. 16 So what do we need? Just to briefly 17 review some of the things and takeaways from today, I 18 hope you guys have learned and come to appreciate that 19 C. auris can asymptomatically colonize patients' skin 20 and that increases their risk of developing an

21 infection and it contributes to environmental

22 contamination and transmission to others.

Page 109 1 2 the Mycotic Diseases Branch, for doing a lot of work 3 on this, but also other fungi. We always like to 4 point out that we are a small but dynamic group. 5 We're the only group at CDC responsible for an entire 6 kingdom of life and we couldn't do that without a 7 really strong and dynamic team. 8 And I'd also like to thank other 9 groups, the Wadsworth Laboratory, Chicago Department 10 of Health, Mary Hayden and Rush University, Julie 11 Segre and NIH, Susan Huang and UCI, and others that 12 we've collaborated with on these special studies to 13 learn what we've learned. 14 With that, I want to conclude with one 15 of our mottoes is think fungus and save lives. And 16 thanks again to the organizers for including fungi in 17 this important conversation. And with that, I will 18 conclude my talk and turn it back over to the 19 moderators. Thank you. 20 TIMOTHY BENSMAN: Wonderful. Well thank

21 you Dr. Sexton and a very nice presentation. Our next

22 speaker is Dr. Alice Guh who will present on

- 1 Clostridioides difficile: Epidemiological Risks and
- 2 Decolonization Strategies. Dr. Guh is a U.S. public
- 3 health service medical officer in the Division of
- 4 Healthcare Quality Promotion at the CDC. She leads
- 5 the Clostridioides difficile infection and multisite
- 6 gram-negative surveillance initiative team within the
- 7 Epidemiology Research and Innovations Branch in DHQP.
- 8 Dr. Guh, the microphone is yours.
- 9 DR. ALICE GUH: Thank you. Good
- 10 morning, everyone. I will be presenting on
- 11 Clostridioides difficile or C. diff, the Epidemiologic
- 12 Risks and Decolonization Strategies. Next slide,
- 13 please.
- 14 I have no financial disclosures. Next
- 15 slide.
- What we need for C. diff is an
- 17 effective decolonization strategy to prevent
- 18 transmission of C. diff from infected patients and
- 19 asymptomatic carriers and to prevent primary and
- 20 recurrent C. diff infection. We also need an approved
- 21 microbiome-based therapeutic for C. diff infection.
- 22 There are currently several

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- 1 biotherapeutics and clinical trials, some of which I
- 2 will be highlighting later in my presentation, but
- 3 first I'd like to provide some background on C. diff
- 4 and associated colonization risks. Next slide,
- 5 please. Next slide.
- 6 C. diff is an anaerobic gram-positive
- 7 spore-forming gastrointestinal pathogen. Transmission
- 8 usually occurs via the oral-fecal route. Clinical
- 9 spectrum ranges from asymptomatic colonization to
- 10 severe disease with fulminant colitis and death. C.
- 11 diff is the leading cause of healthcare-associated
- 12 diarrhea and is increasingly reported in the
- 13 community.
- 14 It's been estimated that there were
- 15 462,000 incident C. diff infections or CDI in the
- 16 United States in 2017 with an estimated close to
- 17 224,000 cases and almost 12,800 associated deaths
- 18 among hospitalized patients. Next slide, please.
- 19 Asymptomatic colonization of C. diff
- 20 can occur in about 7 to 18 percent of hospitalized
- 21 patients and 15 percent of long-term care facility
- 22 residents. Colonization rate can be higher during

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- 1 outbreak settings with one study reporting 51 percent
- 2 during an outbreak involving a long-term care
- 3 facility.
- 4 Among persons in the community, about 2
- 5 to 10 percent can be asymptomatically colonized with
- 6 C. diff. For most healthy individuals with intact
- 7 microbiota, C. diff carriage is transient but for some
- 8 they can remain persistently colonized for several
- 9 months. Next slide, please. Next slide.
- In a meta analysis of hospitalized
- 11 patients, previous CDI, hospitalization in the
- 12 previous six months, tube feeding, gastric acid
- 13 suppression, and corticosteroid use in the previous
- 14 eight weeks were all found to be risk factors for C.
- 15 diff colonization. Interestingly, prior antimicrobial
- 16 use was not found to be a risk factor for C. diff
- 17 colonization among hospitalized patients, but this may
- 18 be due to the pooling of all antibiotic classes in the
- 19 meta analysis, which may have diminished any class-
- 20 specific effect.
- In addition, it's possible that even
- 22 without prior antimicrobial use, a patient's

- 1 microbiome might be disrupted from acute illness or
- 2 from dietary changes of hospitalization that might
- 3 predispose the patient to being colonized with D.
- 4 diff. Among long-term care facility residents, risk
- 5 factors for C. diff colonization include prior CDI
- 6 outbreaks in the facility, previous CDI, prior
- 7 hospitalization, and prior antimicrobial use. Next
- 8 slide.
- 9 It's been shown that 10 to 60 percent
- 10 of hospitalized patients who are colonized with
- 11 toxigenic C. diff may develop CDI. The risk of CDI
- 12 increases with gut microbiome disruption and
- 13 immunosuppression. The primary risk factor for CDI is
- 14 antibiotic use which can directly impact the gut
- 15 microbiome. Other risk factors that can affect the
- 16 microbiome and/or cause immunosuppression include
- 17 proton pump inhibitor use, advanced age, and
- 18 chemotherapy.
- 19 Certain strains of C. diff may also be
- 20 more likely to cause disease. One study found that
- 21 ribotype 027, which is the epidemic strain and
- 22 produces more toxin than most other C. diff strains

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	was found in 25 percent of CDI cases versus 3 percent	t 1	spores are ingested, it can remain in the dormant form
2	of asymptomatic carriers. Next slide, please.	2	or they can germinate to form vegetative cells that
3	Asymptomatic carriers can transmit C.	3	cause disease. The homeostasis of the gut microbiome
4	diff to other patients since they can shed the	4	is essential in preventing the overgrowth of the
5	organism on their skin and in the environment,	5	vegetative form of C. diff and along with an intact
6	although to a lesser degree than symptomatic patients	. 6	immune system can help keep the patient in a
7	Certain patients who are colonized might be a higher	7	asymptomatically colonized state and not develop
8	risk of transmission, including those who were	8	disease, although shedding can still occur.
9	recently infected and might still have a high burden	9	In contrast, when the microbiota is
10	of the organism.	10	disrupted, C. diff can thrive in the gut causing
11	In one study, patients with recent CDI	11	disease and lead to significant shedding, hence the
12	accounted for 22 percent of hospitalized asymptomatic	ic12	reason why there is great interest in therapeutic
13	carriers. Patients with a higher burden of C. diff	13	strategies for CDI that can help restore the normal
14	colonization might also shed greatly on their skin and	14	gut microbiota. Next slide, please. Next slide.
15	in the surrounding environment. Next slide, please.	15	Currently microbiome-based therapy for
16	In fact, several studies have	16	C. diff is primarily focused on the treatment of
17	demonstrated the transmission of C. diff by	17	recurrent disease. They include traditional fecal
18	asymptomatic patients. In the study on the left by	18	microbiota transplantation or FMT and novel
19	Curry et al., they found that incident CDI cases amon	g19	biotherapeutics. To date, there is a lack of studies
20	hospitalized patients were as frequently linked to	20	evaluating microbiome-based therapy for the prevention
21	transmission from asymptomatic carriers as from	21	and treatment of primary CDI, and as of yet there is
22	symptomatic patients. They also identify four	22	no effective decolonization strategy of asymptomatic
	Page 115		Page 117
	1 ugc 113		rage 117
1	transmission events that may have occurred from	1	carriers. Next slide, please.
		1 2	
2	transmission events that may have occurred from	2	carriers. Next slide, please.
3	transmission events that may have occurred from environmental exposures where transmission may have	2 3	carriers. Next slide, please.  FMT, which you heard mentioned by
3	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who	2 3 4	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of
2 3 4 5	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who were asymptomatic carriers.	2 3 4 5	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of the most well studied microbiome-based therapy for
2 3 4 5 6	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who were asymptomatic carriers.  In a more recent study by Donskey et	2 3 4 5 6	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of the most well studied microbiome-based therapy for CDI. It involves the transplantation of the gut
2 3 4 5 6 7	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who were asymptomatic carriers.  In a more recent study by Donskey et al., they investigated transmission of C. diff from	2 3 4 5 6 7	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of the most well studied microbiome-based therapy for CDI. It involves the transplantation of the gut microbiota from a healthy donor to a patient to
2 3 4 5 6 7 8	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who were asymptomatic carriers.  In a more recent study by Donskey et al., they investigated transmission of C. diff from asymptomatically colonized or infected long-term care	2 3 4 5 6 7 8	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of the most well studied microbiome-based therapy for CDI. It involves the transplantation of the gut microbiota from a healthy donor to a patient to restore normal diversity and function. It's usually
2 3 4 5 6 7 8	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who were asymptomatic carriers.  In a more recent study by Donskey et al., they investigated transmission of C. diff from asymptomatically colonized or infected long-term care facility residents. Using whole genome sequencing,	2 3 4 5 6 7 8 9	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of the most well studied microbiome-based therapy for CDI. It involves the transplantation of the gut microbiota from a healthy donor to a patient to restore normal diversity and function. It's usually administered endoscopically or through the nasogastric
2 3 4 5 6 7 8 9	transmission events that may have occurred from environmental exposures where transmission may have occurred from prior room occupants who had CDI or who were asymptomatic carriers.  In a more recent study by Donskey et al., they investigated transmission of C. diff from asymptomatically colonized or infected long-term care facility residents. Using whole genome sequencing, they found that 19 percent of healthcare-associated	2 3 4 5 6 7 8 9	carriers. Next slide, please.  FMT, which you heard mentioned by several of the other CDC speakers, is probably one of the most well studied microbiome-based therapy for CDI. It involves the transplantation of the gut microbiota from a healthy donor to a patient to restore normal diversity and function. It's usually administered endoscopically or through the nasogastric or nasoduodenal tube. Several randomized controlled
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1 received vancomycin with bowel lavage. Next slide,

2 please.

3 There are, however, some challenges

4 with traditional FMT. Although generally considered a

5 safe procedure, there some risks such as possible

6 aspiration and bowel perforation. Most of the safety

7 data that we have come from short-term studies. So

8 far, associated adverse events are generally self-

9 limited and infectious complications have been rarely

10 recorded, although they have included two

11 immunocompromised patients who developed bacteremia

12 from extended-spectrum beta-lactamase-producing E.

13 coli.

14 More recently, there has Shiga toxin-

15 producing E. coli from a single donor to four patients

16 who developed self-limited diarrheal illness. Another

17 challenge with FMT Is the heterogeneity and its

18 practice. Although we now have stool banks, there is

19 the variability in donor recruitment and screening as

20 well as stool preparation methods. Next slide,

21 please.

22 Therefore, there's a need for

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1 standardized microbiome restoration therapies. In

2 recent years there's been a development of several

3 capsule- and enema-based products. Several these

4 products have many potential benefits. For example,

5 they're easier to administer and especially the

6 capsule-based product they're more aesthetically

7 pleasing to patients. And both capsule- and enema-

8 based products are less invasive than traditional FMT.

Many of these novel products are now in

10 clinical trial. They include whole stool or defined

11 FMT as well as a product containing fecal bacterial

12 spores specifically purified firmicutes spores known

13 as SER-109. A Phase 3 double-blinded randomized

14 control trial was completed for SER-109 and the

15 results were published earlier this year.

16 They had enrolled 182 patients with

17 three or more episodes of CDI to receive either SER-

18 109 or placebo following standard care antibiotic

19 therapy. Twelve percent of the SER-109 group versus

20 40 percent of the placebo group developed recurrent

21 CDI. A recent meta analysis compared capsule-based

22 FMT with FMT given endoscopically. Both treatments

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1 showed similar efficacy with a polled cure rate of 92

2 percent for capsule-based FMT and 94.8 percent for FMT

3 using colonoscopy. Next slide, please.

4 As Phase 3 clinical trials completed

5 for some of the novel biotherapeutics, there's the

6 potential for an approved product that can replace

7 traditional FMT and be effective in preventing further

8 recurrence of C. diff as well as transmission of C.

9 diff to other patients. Over the next decade or so,

10 we hope to have data from longitudinal follow-up

11 studies that can provide more insight on long-term

12 safety as well as the durability of FMT and other

13 microbiome restoration therapies.

14 We also need continued advancements in

15 developing defined microbial consortia to help improve

16 the safety of these products. In addition, we should

17 explore the role of FMT for the management of primary

18 CDI. A few years ago there was a proof of concept

19 clinical trial that enrolled 20 patients with primary

20 CDI and signed to receive either FMT or treatment with

21 metronidazole. A full clinical response was observed

22 in 78 percent of the FMT group versus 45 percent of

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1 the metronidazole group. A Phase 3 clinical trial is

2 currently underway. Next slide, please.

3 I also want to mention the use of

4 nontoxigenic C. diff strains to prevent recurrent CDI.

5 In a Phase 2 double-blinded randomized control trial,

6 173 patients with CDI were signed to receive one of

7 three treatments with a nontoxigenic C. diff strain,

8 M3, or to receive placebo. The three treatments

9 consisted of either 10 to the fourth or 10 to the

10 seventh spores of M3 per day for seven days each or 10

11 to the seven spores per day for 14 days each.

12 This figure on the slide shows the

13 proportion of patients of positive C. diff cultures

14 from day one of the study through week 26. The shaded

15 color represents toxigenic C. diff and the nonshaded

16 color represents nontoxigenic C. diff. The top

17 lefthand quadrant shows the results of the placebo

18 group. We can see that there was a high rate of

19 colonization with toxigenic C. diff versus the

20 remaining three quadrants each showing the results of

21 one of the three treatments with M3.

22 You can see that they all had high rate

Page 122 1 of colonization when nontoxigenic C. diff compared to 1 versus 12 percent in the no prophylaxis group 2 the placebo group. In fact, CDI recurrence was 3 observed in only 11 percent of patients who received 4 the nontoxigenic C. diff strain M3 versus 30 percent 5 of the placebo group. The likely mechanism by which 5 vancomycin prophylaxis group. However only a portion 6 M3 might be preventing recurrent CDI is that patients 7 are colonized with it, thereby decolonizing or out 8 competing toxigenic C. diff strains from the 9 microbiome. 10 The investigators noted that M3 11 colonization was likely transient as it was 12 undetectable after week 22 of follow up, possibly due 13 to restoration of the normal gut microbiota. Next 14 slide, please. 15 To date, there is no effective strategy 15 16 for decolonizing asymptomatic carriers. This study 17 was conducted in the early '90s and was unfortunately 17 want to note that there are some major shortcomings 18 unsuccessful. They randomized 30 asymptomatic

19 carriers to receive either 10 days of oral vancomycin

20 or metronidazole or placebo. This figure shows the

21 percent of positive stool cultures among the

22 asymptomatic carriers.

1

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2 the dashed line and treatment shown by dotted line did 2 that you heard earlier in Dr. McDonald's presentation. 3 not suppress C. diff colonization; whereas, oral 4 vancomycin shown by the solid line suppressed 5 colonization during treatment, but you can see that 6 this effect was only temporary since the carriage rate 7 increased subsequently after vancomycin was stopped. 7 transmission of C. diff from infected patients and 8 Next slide, please. 9 And lastly, I want to mention the use 10 of oral vancomycin prophylaxis for primary and 11 secondary CDI prevention. As I alluded to in my last

Treatment with metronidazole shown by

14 reduced colonization resistance to C. diff that can 15 persist for weeks after vancomycin has stopped, 16 potentially increasing a patient's risk for CDI.

12 slide, vancomycin has potent activity against C. diff

13 but it can profoundly affect the microbiome resulting

17 There's been at least one randomized 18 control trial that has assessed the use of oral 19 vancomycin prophylaxis. The trial enrolled 100

20 patients to receive either oral vancomycin prophylaxis 20 lives of people with cystic fibrosis. Dr. Brown is

21 while systemic antibiotics or no prophylaxis. Zero

22 percent in the oral vancomycin prophylaxis group

2 developed healthcare facility onset CDI.

3 No new colonization of vancomycin

4 resistant enterococci was detected among the oral

6 of the patients had a follow up swab done. A recent

7 meta analysis assessed the efficacy of oral vancomycin

8 prophylaxis for primary and secondary CDI prevention

9 in patients treated with systemic antibiotics. This

10 analysis included 11 studies, including one randomized

11 controlled trial and several studies immunocompromised

12 patients, and they found that oral vancomycin

13 prophylaxis is protective against CDI and that its use

14 was not associated with high risk of VRE.

While these results are promising and 16 more randomized controlled trials are needed, I do

18 with the strategy namely that vancomycin is an

19 antibiotic and it's used to treat an infection, and as

20 I mentioned earlier it can leave -- it can affect the

21 microbiome leaving it in an even more impaired state

22 and that's failing in an attribute of decolonization

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1 or pathogen reduction agent, many of these attributes

3 Next slide, please. Next one.

4 So in conclusion, I'd like to reiterate

5 that for the future of C. diff, we need an effective

6 decolonization strategy that can help prevent

8 asymptomatic carriers and prevent primary and

9 recurrent C. diff infection. We also need an approved

10 microbiome-based therapeutic for C. diff infection,

11 which I believe will not be too far off in the future

12 since there are several biotherapeutics that are

13 currently in clinical trials. Next slide.

14 Thank you. I'd like to turn it back to

15 the moderators.

16 TIMOTHY BENSMAN: Wonderful. Well

17 thank you, Dr. Guh. We will now hear presentations on

18 patient impact and perspectives. Dr. Whitney Brown

19 will share with us the impact of infection on the

21 currently at Inova advanced lung disease and

22 transplant program, and helped create the Inova Cystic

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1 Fibrosis Center.

2 In July of 2021, Dr. Brown joined the

3 clinical affairs department with a focus on supporting

- 4 the care center network and the evolving cystic
- 5 fibrosis care model. She continues to care for adults
- 6 with cystic fibrosis at Inova which energizes and
- 7 informs her work at the Cystic Fibrosis Foundation.
- 8 Dr. Brown, the stage is yours.

9 DR. A. WHITNEY BROWN: Thank you so

10 much and good morning. Yes, I have the pleasure of

- 11 speaking today on behalf of people with cystic
- 12 fibrosis to give us a little insight into the impact
- 13 of infection on their lives. Next slide.
- 14 So as many of you know, cystic fibrosis
- 15 is really characterized by a lifetime of infections,
- 16 and I'll be primarily talking about the respiratory
- 17 tract today but what we can see in this schematic is
- 18 because of the underlying defect in cystic fibrosis,
- 19 the result is sticky, dehydrated mucous down in the
- 20 lungs and that really sets the stage for inflammation
- 21 and infection and the cycle goes round and round.
- 22 And in fact, really repeated or

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- 1 persistent airway infection over the course of a
- 2 lifetime is what leads to progressive loss of lung
- 3 function in people with cystic fibrosis. And
- 4 unfortunately respiratory failure is the leading cause
- 5 of death. Next slide.
- So this acquisition of respiratory
- 7 infections really occurs early in life and what I'm
- 8 showing you here is a schematic from our 2019 cystic
- 9 fibrosis patient registry data report. And so what we
- 10 can see on the X axis is this is the patient age and
- 11 years and on the Y axis, the percentage of individuals
- 12 that culture from the respiratory tract one or more of
- 13 these organisms.
- 14 And so early, on by age one and age
- 16 that even infants have acquired respiratory tract
- 17 infections and early on it's primarily staph aureus,
- 19 predominant with pseudomonas or staph aureus and
- 20 pseudomonas in combination. But what you definitely 20 contact precautions in healthcare settings, regardless
- 21 notice is the percentage of the population that
- 22 escapes respiratory infections is very small at the

1 bottom, denoted in gray. Next slide.

- 2 So because the acquisition of
- 3 infections occurs so early in life and because there's
- 4 repeated exposure to the healthcare system for people
- 5 with cystic fibrosis, we struggle with antimicrobial
- 6 resistance. And here again, we have more data from
- 7 our patient registry, this time from 2020. And I can
- 8 show you here in the bottom left field, we see the
- 9 distribution of gray, that's the age distribution, the
- 10 number of individuals at each age in our registry.
- 11 Superimposed on that are the people in
- 12 2020, individuals that grew staph aureus. And the
- 13 subset in red are those who grew methicillin-resistant
- 14 staph aureus. So clearly -- and we can see that staph
- 15 is again more prevalent at early ages and decreases
- 16 and stabilizes later in life.
- 17 Likewise, up with pseudomonas, same
- 18 kind of figure with gray being all individuals in the
- 19 registry and then we see the distribution of those who
- 20 grew pseudomonas in the registry from a respiratory
- 21 culture, and then the subset growing multidrug-
- 22 resistant pseudomonas. So clearly, we struggle with

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1 antimicrobial resistance. Next slide.

- 2 And we have learned some difficult
- 3 lessons over time, and this is just to highlight.
- 4 This is a timeline of reported publications or reports
- 5 of transmissible strains of, in this case we're
- 6 focusing on pseudomonas and burkholderia that were
- 7 published in the literature and made known over time
- 8 and this really heightened our awareness that these
- 9 pathogens don't just come from the environment but
- 10 there can be patient-to-patient transmission occurring
- 11 in nosocomial settings as well as in community
- 12 settings like even the CF summer camps that used to
- 13 occur. Next slide.
- 14 And this -- these events and these
- 15 two, you can see a variety of different colors meaning 15 reporting really lead to a revamping of our infection
  - 16 prevention and control guidelines for cystic fibrosis.
  - 17 And these were put out in 2013 and are specific to our
- 18 but as kids aged through adolescence, it becomes morel 8 population. Really, the most fundamental one is the
  - 19 first year that all people with CF are placed on

  - 21 of what they have grown in the past. And
  - 22 historically, this was gown and gloves, as you see in

1 the picture.

2 Of course, now with universal or almost

3 universal masking in healthcare settings, the mask has

- 4 been added. And speaking of masks, we've asked our
- 5 patients to wear masks themselves in healthcare
- 6 settings since the publication of these updated
- 7 guidelines and also to keep 6-foot distance between
- 8 other patients and themselves.

9 And so this distance is not only in the

- 10 healthcare setting but also in social settings. So
- 11 for example, at Cystic Fibrosis Foundation events or
- 12 other social settings, only one person with CF is
- 13 usually invited to indoor events to be extremely
- 14 cautious on this basis. We also have in this reported
- 15 guideline standards for reducing risk with pulmonary
- 16 function testing and also for cleaning and
- 17 disinfecting environmental services. Next slide.
- So naturally I think most healthcare
- 19 providers and patients and families would agree that
- 20 these guidelines are really for their protection, but
- 21 I wanted to share some terms or thoughts that have
- 22 been shared with me from patients over the years in

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- 1 terms of really how these guidelines impact their
- 2 lives.
- 3 So as I mentioned, two people with CF
- 4 can't be within 6 feet of each other, so really that
- 5 has resulted in a heavy social media presence, lots of
- 6 virtual friendships. And in the healthcare setting,
- 7 although there are upsides to getting private rooms
- 8 with contact precautions, you know, naturally there in
- 9 some settings is the feeling of isolation and
- 10 stigmatism, particularly for healthcare settings that
- 11 are outside of the typical CF team.
- 12 And indeed, patients I think complain
- 13 that procedures and surgeries are often scheduled at
- 14 the end of the day or postponed unnecessarily in some
- 15 cases because of this contact precaution status, which
- 16 results in prolonged fasting. It really can be a
- 17 problem for those with CF-related diabetes. Next
- 18 slide.
- 19 So what about the burden of getting
- 20 sick? So we know these bacteria are down in the
- 21 lungs, and what I'm showing you here is, this is a
- 22 graph showing us the number of pulmonary exacerbations

1 requiring intravenous antibiotic use. So this is the

- 2 number of times people get sick and need IV
- 3 antibiotics. And this is a time span from the
- 4 beginning of 2019 looking at almost to the end of
- 5 2020.
- 6 And what we see up here in red is for
- 7 people 12 years and older and the number of monthly
- 8 exacerbations and down here in blue is 11 and younger.
- 9 And what we can see at the beginning of 2019 was
- 10 really there was a high level of intravenous
- 11 antibiotic use for pulmonary exacerbation treatment
- 12 each month, a little bit of up and down but high level
- 13 in those 12 and older.
- 14 And then something transformative
- 15 happened in our community in October of 2019 which was
- 16 the approval of elexacaftor/tezacaftor/ivacaftor, and
- 17 this is an oral CFTR modulator medication that helps
- 18 the CF protein work better in almost 90 percent of
- 19 individuals with CF. But initially it was approved
- 20 for 12 and up.
- So what do we see in this 12 and up
- 22 group? We see a marked decline in the subsequent

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- 1 months in the need for IV antibiotics in this
- 2 population, which was very, very encouraging. We
- 3 don't see it as notably in the pediatric population,
- 4 because the medication was only approved initially for
- 5 12 and up.
- 6 Then of course we have COVID coming on
- 7 the scene in March of 2020, which led to a further
- 8 decrease in both populations now of IV antibiotic use,
- 9 and that of course is partially a result of social
- 10 distancing and more universal masking. Next slide.
- 11 And then this slide is just to catch us
- 12 up on what happened last year. And really last year
- 13 is a continuation of the really good pattern we saw
- 14 early in the in the pandemic after the approval of
- 15 elexacaftor/tezacaftor/ivacaftor, which is only 14
- 16 percent of adults needing IV antibiotics last year,
- 17 only 10 percent of children which are markedly reduced
- 18 from the rates seen pre-pandemic.
- 19 Likewise, we have this chart here.
- 20 This is based on surveillance respiratory cultures
- 21 that were done in 2019 and then compared to those done
- 22 last year, again from our patient registry. And we

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- 1 see encouraging trends that there may be less
- 2 infections being detected with -- in terms of these
- 3 key bacteria for us and non-tuberculous mycobacteria
- 4 when you compare the two years.
- 5 However, there are two caveats to this,
- 6 which is our clinic attendance and therefore
- 7 surveillance culture data has not returned to pre-
- 8 pandemic levels. So we are -- we have a sampling
- 9 bias. There are less cultures being collected. And
- 10 secondly, because of the new medication, many people
- 11 with CF are living healthier lives, having less cough
- 12 and sputum, and therefore the cultures that we are
- 13 getting, they may be more oropharyngeal or throat
- 14 swabs because patients cannot cough up sputum on
- 15 command during their visits. So we take these data
- 16 with a grain of salt, but some encouraging trends.
- 17 Next slide.
- 18 But still, infection remains a deep
- 19 concern for our community and this -- and many
- 20 patients express to me that they are afraid that they
- 21 will run out of antibiotic choices over the course of
- 22 their lifetime due to resistance and due to repeated

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- 1 use of oral, inhaled, and intravenous antibiotics.
- So we conducted a survey in quarter
- 3 three of last year asking the patients and families in
- 4 our community what they're -- what they saw the CF
- 5 Foundation's priorities in the field of infection-
- 6 related research. And not surprisingly, the top one
- 7 here was the development of new treatments. And
- 8 again, that's to answer that concern about
- 9 antimicrobial resistance.
- Also optimizing current treatments was
- 11 notable in the top three, and then again improving
- 12 detection and diagnosis, which I would argue is
- 13 becoming even more important now that less individuals
- 14 are coughing up sputum cultures. Next slide.
- 15 So in our research portfolio that we
- 16 fund at the CF Foundation, we're trying to mirror our
- 17 community's priorities, and this you can see is the
- 18 number of studies that we are funding divided up into
- 19 those in industry, those in academics, and looked at
- 20 over time and by pathogen type.
- And what we can see is that really
- 22 heavy emphasis, not surprisingly, on the burden of

- 1 pseudomonas also on non-tuberculous mycobacterium, and
- 2 then multiple organisms accounting for another body of
- 3 funding. And more recently, really also interested in
- 4 bacteriophage therapy. Next slide.
- 5 So we have many unanswered questions
- 6 when it comes to the infection landscape in cystic
- 7 fibrosis, but I hope I've convinced you that during
- 8 the pandemic time period with the approval of the
- 9 transformative new therapy, things are looking up for
- 10 our population. But questions remain and one of those
- 11 would be with less antibiotic use, if this trend
- 12 continues, will we see less antimicrobial resistance
- 13 in our population?
- 14 Secondly we're all very concerned about
- 15 the impact of masking. I think it has had a positive
- 16 impact on the incidence of pulmonary exacerbations.
- 17 And we're -- you know, I think it would be quite
- 18 beneficial to continue masking in healthcare settings
- 19 for the protection of our community.
- 20 And then lastly, with less -- if people
- 21 are healthier with CF, if they're lucky enough to be
- 22 on this therapy and are benefiting, they're not

- 1 coughing and having as much sputum. Will their
- 2 pathogens be as transmissible and will there be a
- 3 point at which we can revisit infection control
- 4 practices and allow people with CF to be safely
- 5 together in person?
- These are very provocative questions
- 7 and really they're going to take time to answer. And
- 8 to get these answers, we're going to continue to
- 9 perform surveillance respiratory cultures. We're
- 10 going to continue to collect clinical data in our
- 11 registry. And we're going to continue to invest in
- 12 infection-related research. Thank you.
- 13 TIMOTHY BENSMAN: Thank you, Dr. Brown.
- 14 We'll now hear from Ms. Jeanine Thomas on the
- 15 aftermath of living with having healthcare-associated
- 16 infections. Ms. Thomas was the first patient advocate
- 17 to raise the alarm concerning methicillin-resistant
- 18 staph aureus and healthcare-associated infections in
- 19 2002 and founded the MRSA Survivors Network in 2003.
- 20 She's a survivor of MRSA sepsis and C. difficile. Ms.
- 21 Thomas, the floor is yours.
- 22 JEANINE THOMAS: First, I would like to

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- 1 commend and give gratitude to the healthcare workers
- 2 who have worked tirelessly and selfishly through the
- 3 last couple of years to save patients from COVID-19.
- 4 Your commitment to save patients from COVID is highly
- 5 appreciated and all the sacrifices that you made from
- 6 yourself and from your family. We applaud you.
- 7 The healthcare system was pushed to its
- 8 limit and beyond, but now we have more protocols in
- 9 place that can combat healthcare-acquired infections
- 10 and so many more patients now know what a nasal swab
- 11 is and how it can help them from acquiring an
- 12 infection.
- 13 It has been over 20 years since I was
- 14 infected with MRSA. My story is like many patients
- 15 who came into a hospital for surgery that should have
- 16 not been life threatening and ended up fighting for
- 17 their lives and were forever changed by this
- 18 experience. The sad thing is that now we have soaring
- 19 rates of MRSA infections.
- 20 My journey started in December of 2000
- 21 when I slipped on black ice and fractured my ankle. I
- 22 had multiple fractures and -- which required a plate

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- 1 and two screws. During surgery, I was infected with
- 2 MRSA and it went into my bone marrow giving me
- 3 osteomyelitis and later it would be sepsis.
- 4 I went home a couple of days after
- 5 surgery and was recovering, but then I began to feel
- 6 nauseous but didn't have a fever. I paged my surgeon
- 7 and he said, come to the ER. And of course, it was a
- 8 Friday night. When the doctors took my cast off, my
- 9 I was horrified by the sight and smell of my leg. I
- 10 could not have surgery that night because I had eaten
- 11 during the day.
- The next day, I had surgery and I don't
- 13 remember it. By then, I had a high fever and was in a
- 14 lot of pain and sedated. The next few days were also
- 15 a blur and I had another surgery to clean the wound
- 16 and I could no longer speak or communicate with
- 17 anyone. I knew I was gravely ill and I felt that I
- 18 was dying, and I don't know why the staff didn't
- 10 was dying, and I don't know why the start didn't
- 19 realize that because I know sepsis is hard to
- 20 diagnose.
- I was burning up with fever. I felt
- 22 utterly helpless and afraid, desperate to speak but

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- 1 could not. My body was shutting down. I didn't want
- 2 to die. I still had more -- so many more things to do
  - 3 in life. My culture had come back positive for MRSA,
  - 4 but when I was not given vancomycin, so the broad-
  - 5 spectrum antibiotic was not working on me.
- 6 On the fifth night of being in the
- 7 hospital, I suddenly woke up in the night and the
- 8 night nurse was checking my temp and laid the box on
- 9 my chest. I happened to see for a second the digital
- 10 readout, 105. I thought, oh my God, no wonder I'm
- 11 burning up. I heard the nurses screaming in the hall
- 12 to page my doctor and then carts rattling down the
- 13 hall as they worked on trying to save me. I was near
- 14 death.
- 15 I had a near death experience, the one
- 16 you had when you were close to crossing over. I felt
- 17 relieved that I was not burning up anymore and a
- 18 serene calmness came over me. I saw the nurses
- 19 working on me and they were very distraught and
- 20 anxious. I wanted to tell them that I was going to be
- 21 -- not going to die, that I was going to be okay. It
- 22 was not my time.

- 1 I was finally given vancomycin. I
- 2 remember being semiconscious later the next day. I
- 3 could not open my eyes. Later I could not even see
- 4 anything. All I saw was dark gray. I did not know if
- 5 I was alive or in some other space of time or reality.
- 6 I could hear faintly voices around me. I fought as
- 7 hard as I could to open my eyes and I was able to for
- 8 a second. I knew that I was alive but would find out
- 9 later that I was septic and had the beginnings of
- 10 multiple organ failure.
- The next few weeks were a blur of
- 12 surgeries and unbearable pain as they tried to save my
- 13 leg from amputation. I spent Christmas in the
- 14 hospital and finally my infection stabilized. I went
- 15 home and did not recognize myself. I had lost over 30
- 16 pounds and I had no color in my skin, so sickly
- 17 looking with excruciating pain and total fatigue.
- I had a couple of more surgeries on my
- 19 leg but was not able to have a bone, muscle, or skin
- 20 graft. I then developed C. diff which was another
- 21 trip to the ER and more antibiotics. I was on a
- 22 cocktail of antibiotics for many months and after a

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1 year I had the hardware taken out. I was diagnosed

- 2 and treated with posttraumatic stress disorder and
- 3 depression. I never had these disorders before.
- 4 Over the next couple of years, I would
- 5 have fevers, more antibiotics and feel like I was just
- 6 surviving. I would have breakouts and I was
- 7 constantly vigilant and I was the lucky one, though.
- 8 I had survived, though the pain was so increased in my
- 9 leg that many times I wish that they had amputated it.
- 10 But I was wondering how could I have died nearly from
- 11 ankle surgery. There was barely any information about
- 12 MRSA on the internet.
- 13 In 2003, I founded my organization MRSA
- 14 Survivors Network to educate and raise the alarm to
- 15 the epidemic and we also established the first crisis
- 16 hotline in the U.S. I worked with former Illinois
- 17 State Senator Barack Obama to pass the Hospital Report
- 18 Card Act to mandate MRSA and other HAIs be publicly
- 19 reported.
- 20 It was the first legislation of its
- 21 kind in the U.S. I was placed on an Illinois State
- 22 advisory board and saw that more needed to be done and

- 1 immunocompromised.
- 2 For many, MRSA and HAIs are a
- 3 dehumanizing experience and diminishes a person's
- 4 personal health. I know I felt like a leper. And we
- 5 also lose our wellbeing, quality of life, and for so
- 6 many, financial futures. There's still a stigma for
- 7 MRSA patients and this we've worked very hard at but
- 8 it still is acquiring this.
- 9 If we have learned anything from COVID,
- 10 the pandemic, it is the screening is essential along
- 11 with contact precautions, contamination --
- 12 decontamination, strict hygiene, and more. More
- 13 healthcare facilities suspended screening for MRSA and
- 14 reporting infection rates during the pandemic. MRSA
- 15 has proliferated into a bigger epidemic in the past
- 16 two years.
- We must remember patient safety should
- 18 come first. It is time to laser focus needless pain
- 19 and suffering should not happen anymore. We patients
- 20 want a desire for superior antibiotics and therapies,
- 21 not inferior products. So we must invest in the
- 22 advanced technology, fully staffing of infection

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- 1 initiated legislation, the MRSA Screening and
- 2 Reporting Act, which passed unanimously in Illinois
- 3 and enacted in 2007. It was the first in the country
- 4 and more states followed the legislation.
- 5 From this 50 -- the next couple of
- 6 years, 50 percent of the healthcare facilities were
- 7 screening high risk patients and infection rates were
- 8 dropping. My health over the years was never the same
- $9\,$  and I have to be careful of contracting viruses and if
- 10 I do, I'm sometimes ill for several months. This is
- 11 very common with MRSA patients.
- 12 In 2015, I had a surgery and contracted
- 13 staph aureus and pseudomonas. I was devastated and
- 14 realized that very little had changed for patient
- 15 safety as SSIs are still very high and contamination
- 16 in healthcare facilities needed so much more
- 17 attention, along with other measures.
- 18 I contracted COVID-19 in February of
- 19 2020 and was seriously ill and had long time -- long
- 20 COVID for over a year. But I was able to heal myself
- 21 and have had two more COVID infections since then, and
- 22 of course I'm fully boosted. I am forever

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- 1 control, along with continued training.
- We can never get to zero, but we can
- 3 get close to that. So this should be our goal.
- 4 Remember, prevention saves lives. Thank you. Back to
- 5 the monitor.
- 6 TIMOTHY BEHSMAN: And thank you, Ms.
- 7 Thomas, for your story. The burden you bear is truly
- 8 humbling and something I think we will keep with us as
- 9 we work through this workshop.
- We'll now begin presentations by our
- 11 public comment speakers. Our first speaker is Dr.
- 12 Michael Woodworth, who will talk about microbiome
- 13 approaches to treat colonization with antibiotic-
- 14 resistant bacteria. Dr. Woodworth is an assistant
- 15 professor of medicine, infectious diseases at Emory
- 16 University School of Medicine.
- 17 Dr. Woodworth's research is primarily
- 18 focused on the translational study of microbiome
- 19 therapies like fecal microbiota transplantation to
- 20 treat colonization with antibiotic-resistant bacteria
- 21 and leads two microbiome clinical trials as an
- 22 investigator with the CDC funded Prevention Epicenter

 $\label{eq:page 146} \mbox{Page 146}$   $\mbox{1 of Emory. Dr. Woodworth, the stage is yours.}$ 

2 DR. MICHAEL WOODWORTH: Good morning

- 3 everyone. My name is Michael Woodworth. I'm an
- 4 assistant professor at Emory University School of
- 5 Medicine, and I'm excited to speak to you today about
- 6 microbiome therapies to treat colonization with
- 7 antibiotic-resistant bacteria. I'd like to thank the
- 8 organizers for the opportunity to speak today.
- 9 As talks have so clearly elaborated
- 10 earlier today, antibiotic resistance is a true global
- 11 threat and this is chiefly due to diminishing numbers
- 12 of effective therapies. As an infectious disease
- 13 physician, I frequently see isolates that are
- 14 resistant to many if not all antibiotics on first
- 15 round susceptibility testing, and this is a true and
- 16 present threat.
- 17 Others have said earlier that nothing
- 18 in biology makes sense except in the light of
- 19 evolution, and I would like to suggest today that
- 20 nothing in antimicrobial resistance makes sense except
- 21 in the light of colonization. Simply put, we must
- 22 increase our focus on colonization to address the

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- 1 mounting threats of global resistance.
- 2 So then what can be done for patients
- 3 who are colonized with multidrug or even pan-resistant
- 4 organisms? And the honest answer is that today,
- 5 nothing can be done for these patients, because there
- 6 are no -- as outlined earlier today, intestinal
- 7 microbial communities are well established as being
- 8 critical to MDRO colonization resistance.
- 9 So to further evaluate the safety and
- 10 efficacy of directly applying these microbes in a
- 11 procedure called fecal microbiota transplantation, we
- 12 conducted a small clinical trial in renal transplant
- 13 recipients who are colonized with MDROs after
- 14 infection called PREMIX.
- This slide shows you the culture
- 16 results from the first 11 patients who were enrolled
- 17 and treated in PREMIX, and on the bottom five rows you
- 18 can see the participants who were randomized to start
- 19 with the bowel prep alone without an FMT followed by
- 20 an observation cycle of visits.
- As you can see in the following
- 22 columns, that all patients who were MDRO positive at

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- 1 day 36 by stool culture, proceeded to get an FMT. In
- 2 this way, everyone in the study was eligible to
- 3 receive up to two FMTs. What you can see in the
- 4 observation column, is that five out of five
- 5 participants who received a bowel prep but did not
- 6 receive an FMT were still positive at day 36.
- 7 Those patients who were randomized to
- 8 start with an FMT or proceeded to get an FMT after an
- 9 observation period, you can see that six out of ten of
- 10 these participants were MDRO negative after one FMT.
- 11 And of those who proceeded to get a second FMT, two
- 12 out of three were MDRO negative at day 36.
- In a pooled analysis, eight out of ten
- 14 patients who received at least one FMT were MDRO
- 15 negative at their last stool culture. Shown in the
- 16 time to event analysis in a Kaplan-Meier style plot,
- 17 you can see that in the Y axis, the proportion of
- 18 patients who had a positive MDRO stool culture. The
- 19 green trace shows those patients who were randomized
- 20 to start with FMT and the blue trace shows those
- 21 patients who were randomized to start with an
- 22 observation period followed by FMT at a later date.

- 1 And what you can see is patients who
- 2 were randomized to start with an FMT were those who
- 3 were in MDRO negative first. Put in a slightly
- 4 different way, all of those who were in the
- 5 observation group were MDRO positive until they
- 6 received an FMT.
- 7 Now, because all patients in our study
- 8 were eligible to receive an FMT, we had to turn to a
- 9 different cohort of patients at Emory. This large
- 10 cohort of over 4,000 renal transplant recipients
- 11 contained 16 patients who would have been eligible for
- 12 PREMIX, but were not enrolled and did not receive an
- 13 FMT for any other reason. This group is shown in the
- 14 purple trace. They're compared to our patients in the
- 15 PREMIX study in the brown trace on the top, and what's
- 16 shown on the Y axis is the proportion of agents who
- 17 are free from MDRO infection.
- 18 And what you can see is that the
- 19 patients in the PREMIX study in the brown trace on top
- 20 had a much longer time of being free from MDRO
- 21 infection from the time of their initial eligibility.
- Now, this slide summarizes all of the

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- 1 studies that have been published to date, evaluating
- 2 the safety and efficacy of FMT for MDRO
- 3 decolonization. And what you can see are strong
- 4 signals for efficacy, but the other signal that you
- 5 can see in this table is that none of these studies
- 6 were designed or conducted in the United States and I
- 7 believe that as a country, we're starting to fall
- 8 behind.
- 9 So then how do we move beyond the crude
- 10 application of microbes to try to treat or even
- 11 prevent an infectious disease? Well, you may remember
- 12 that this was the humble beginning of vaccinology when
- 13 Edward Jenner applied a live virus to try to prevent
- 14 small pox in a small boy, and how far we've come in
- 15 vaccinology since that time, such that we could
- 16 develop an entirely novel vaccine within less than a
- 17 year of the emergence of a global pandemic.
- 18 So then I had two suggestions for how
- 19 to accelerate the development of microbiome therapies
- 20 for MDRO colonization. First, we need to do the
- 21 studies. We need to design and conduct prospective
- 22 clinical trials of decolonization as an indication and

- 1 therapeutics. Thank you for your time and attention
- 2 and for the invitation to speak. Good morning
- 3 everyone.
- 4 TIMOTHY BENSMAN: Thank you, Dr.
- 5 Woodworth. Our next speaker is Carl Genberg, who will
- 6 speak about Preventing Biofilm Fouling of Indwelling
- 7 Medical Devices to Reduce Healthcare-Associated
- 8 Infections and Antimicrobial Resistance.
- 9 Mr. Genberg is a chief scientist and
- 10 development officer at N8 Medical. Mr. Genberg is
- 11 involved in the development and commercialization of
- 12 patented technology designed to prevent bacteria,
- 13 fungi, and viruses from forming biofilms on medical
- 14 devices and resulting healthcare-associated
- 15 infections. Dr. Genberg, the floor is yours.
- 16 CARL GENBERG: Thank you very much.
- 17 Good morning. My name is Carl Genberg. I'm with N8
- 18 Biosciences, also known as N8 Medical. I'd like to
- 19 thank the organizers for allowing me to speak to you
- 20 this morning. I'll be speaking on three points:
- 21 HAIs, the role that biofilms play in HAIs, and how we
- 22 may prevent such biofilm-related HAIs with our

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- 1 as a primary endpoint.
- Second, we must require data sharing
- 3 and open science for microbiome clinical trials.
- 4 Almost everything that we've come to learn about the
- 5 human microbiome, much less interventional studies,
- 6 had its beginning in the Human Microbiome Project and
- 7 many of the sub-studies that followed. So much was
- 8 gained from an open data approach that we need to
- 9 carry this forward with academic and industry
- 10 partnerships going forward to accelerate the
- 11 translation of these therapies.
- Finally, in conclusion I would like to
- 13 point out that it was the boldness of the FDA to
- 14 exercise enforcement discretion in 2013 that really
- 15 facilitated and accelerated so much of what we've
- 16 learned since that time about the use of fecal
- 17 microbiota transplantation. So much has been gained
- 18 from secondary study of FMT for other indications
- 19 since that time. This is another one of these moments
- 20 when the FDA can again listen to public comment from
- 21 providers and patients and to facilitate more rapid
- 22 translation and development of microbiome

- 1 CeraShield coated medical devices potentially save
- 2 lives and billions of dollars in the process. Next
- 3 slide, please.
- 4 Just as water may exist in various
- 5 physical forms, liquid, gas, and solid -- ice -- with
- 6 dramatically different properties, bacteria also exist
- 7 in two forms, free living single planktonic cells
- 8 which are highly susceptible to conventional
- 9 antibiotics and biofilms which are slime-like
- 10 aggregates of millions of CFUs of bacterial cells
- 11 which are highly tolerant of conventional antibiotics.
- 12 Next slide.
- 13 We are losing the war against HAIs.
- 14 The situation is likely to get worse. Most of the
- 15 funding efforts to date have gone to develop new drugs
- 16 to cure infections. We need to invest more
- 17 technologies to prevent colonization and infection.
- 18 Next slide.
- 19 Twenty years ago, Dr. Bell highlighted
- 20 the need for a fundamental shift in thinking to focus
- 21 on biofilm-related infections. New technology, our
- 22 biofilm-resisting coating called CeraShield, now makes

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1 that possible. Next.

2 It has been observed in the recent

3 literature that one factor that's been consistently

4 overlooked in these types of discussions is biofilm.

5 Biofilm fouling accounts for 65 percent of hospital

6 acquired infections. According to the NIH, HAIs add

7 \$30 billion annually to the annual healthcare

8 expenditures in the U.S. Next slide.

9 FDA has also called for a focus on

10 preventing infections and the best way, according to

11 Dr. Gottlieb, to prevent a resistant microbe from

12 becoming resistant was to prevent patients from

13 getting infection in the first place. Next slide.

14 Biofilms are responsible for over half

15 in some cases 65 percent of all HAI bacterial

16 infections such as VAP, CAUTIs, urinary tract

17 infections, and surgical site infections. The biofilm

18 growth on these medical devices in the case of gram-

19 negative pathogens secrete endotoxin and these

20 endotoxins lead to inflammatory cytokine cascade

21 driven primarily by IL6. This can be prevented along

22 with the adverse events that are associated with this

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1 type of cytokine cascade. Next.

2 Dr. Donlan of the CDC's Biofilm

3 Research Center has also opined that biofilm plays a

4 key role in antimicrobial resistance and that

5 antimicrobial concentrations sufficient to inactivate

6 planktonic organism are generally inadequate to

7 inactivate biofilm organisms. Next.

8 Recent editorial in The Lancet, also

9 focusing on the need to prevent infections in the

10 first place. Next.

Of the various infections, ventilator

12 associated pneumonia is high incidence and high

13 mortality and is the leading biofilm-related medical

14 device infection. Within hours after intubation of

15 the patient with an endotracheal tube, the surfaces of

16 the tube begin to grow biofilm and these biofilm act

17 as a reservoir in infectious disease, leading to VAP

18 in some cases.

A patient who develops VAP spends on

20 average eight additional days mechanical ventilation

21 in the ICU with an estimated cost of \$4,000 a day,

22 total estimated cost of \$6.4 billion annually in the

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1 U.S., which may be largely preventable if new

2 technology can prevent biofilm growth on endotracheal

3 tubes. Next.

4 We've developed a new technology based

5 on insights from research and innate immunity,

6 specifically the role of antimicrobial peptides as a

7 first line of defense in the innate immune system. We

8 have developed a lead compound CSA-131 which is active

9 against all escape pathogens, fungi, lipid enveloped

10 viruses, COVID, and monkeypox.

There's been some very interesting

12 discussion on the role of Candida auris. We co-

13 published a study with CDC's. Dr. Sean Lockhart on the

14 activity of CSA-131 active against all tested isolates

15 including pan-resistant. FDA has designated our

16 device as a breakthrough device. It's already

17 approved in Canada and Brazil and other countries in

18 the near term. We're working with the NCDC in

19 Tbilisi, Georgia for an upcoming VAP study in high

20 risk patients where the VAP rates may exceed 50

21 percent. Next.

22 Prevention of VAP is a good first

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1 target because it can have a dramatic impact on

2 healthcare and expenditures as well. And this is a

3 technology that is available worldwide at a reasonable

4 cost because we'll be saving the share -- share the

5 savings of what preventable cases of VAP lead to.

6 Even in India, LMIC, we're looking at \$6,000 added

7 costs for VAP.

8 Money saved on treating VAP can be

9 used, redirected to develop and purchase expensive

10 antibiotics and to address other critical healthcare

11 concerns. A solution that is only applicable in

12 wealthy countries is suboptimal. We're dealing with

13 an international crisis. Next.

14 This is a scanning electron microscopy

15 image of endotracheal tubes challenged with a

16 combination of pseudomonas and Candida auris. On the

17 lefthand side, you see dense biofilm. On the

18 righthand side, with our coated endotracheal tube

19 segment, you see clean surface. Next.

20 Of critical importance is that the

21 active is a mimic of antimicrobial peptides which has

22 been in nature for millions of years. And serial

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- 1 passaging studies show that CSA-131 does not induce
- 2 mutation resistance, even after 30 serial passages, in
- 3 contrast to colistin who's MICs rise above 300 and
- 4 close to 400. Next.
- 5 We've done a small study in Canada with
- 6 Professor John Muscedere at Kingston General Hospital.
- 7 We looked at endotracheal tube aspirates from the
- 8 mechanically ventilated patients looking at bacterial
- 9 colonization and we dramatically reduced colonization
- 10 and of significant importance, not a single gram-
- 11 negative pathogen was detected. This compared to
- 12 historical controls from a prior published study,
- 13 looking at 75 and 80 percent even with a sub-glottic
- 14 suctioning device. Next.
- 15 Ceragenins have broad spectrum activity
- 16 -- there are over 100 peer reviewed journal articles -
- 17 active against all escape pathogens, MDR strains, C.
- 18 auris, Candida, aspergillosis, and lipid enveloped
- 19 viruses such as COVID-19 and monkeypox.
- 20 When you're dealing with a lipid
- 21 enveloped virus, the virus mutates, the lipid does
- 22 not. So we expect that this would be broad spectrum

- 1 Trial Task Force for Diseases of the Elderly. Biofilm
- 2 prevention is highly cost effective and will
- 3 significantly reduce the need for antibiotic therapy
- 4 while potentially saving billions. Next.
- 5 Thank you. I look forward to hearing
- 6 from you.

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- TIMOTHY BENSMAN: Wonderful. Thank
- 8 you, Dr. Genberg, for the nice presentation. Our last
- 9 speaker is Dr. Christopher Lehmann who will talk on
- 10 the topic of Microbiome, Liver Transplant, and
- 11 Hospital Acquired Infections. Dr. Lehmann is an adult
- 12 and pediatric infectious disease clinical fellow at
- 13 the University of Chicago. His research is focused on
- 14 describing the interactions between stool microbiota
- 15 and multiple drug resistant organisms, as well as
- 16 identifying possible microbiome therapies to prevent
- 17 multidrug resistant infections. I'll now turn it over
- 18 to you, Dr. Lehmann.
- 19 DR. CHRISTOPHER LEHMANN: Yes, thank

I have no disclosures to make it this

- 20 you for the introduction and thank you to the
- 21 organizers for inviting us to this presentation and
- 22 for putting the presentation together. Next slide.

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1

- 1 in these viruses or the lipid enveloped viruses.
- 2 We're also developing this active as an inhaled drug.
- 3 given the presence of biofilm in cystic fibrosis
- 4 patients with support from the Cystic Fibrosis
- 5 Foundation.
- So this is able to prevent and
- 7 eradicate biofilm. Prevention on medical devices that
- 8 is a very low concentration. Also able to bind
- 9 endotoxin and sequester LPS and most importantly does
- 10 not induce mutational resistance. Next.
- 11 Current drug developments are focused
- 12 on free living planktonic cells, acute infections.
- 13 However, more than half the problem is by biofilm and
- 14 conventional antibiotics are not effective. The only
- 15 way we can deal with this problem is to prevent the
- 16 growth on the first place. There's new technology,
- 17 CeraShield coating that has been developed and can
- 18 achieve this without inducing mutational resistance.
- 19 We're about to start a large 800-
- 20 patients study in Canada, funded by governmental
- 21 agencies in Canada with Professor Muscedere as the
- 22 lead PI, who is the head of the Canadian Clinical

- 2 time. Next slide.
- 3 Before we get into the microbiome
- 4 discussion, I just wanted to briefly mention liver
- 5 transplantation. You know, liver transplantation is
- 6 often the only curative therapy for many liver
- 7 diseases affecting many people and hospital acquired
- 8 infection is a very significant contributor to this
- 9 course, occurring in up to 25 percent of patients.
- 10 These infections are very morbid and
- 11 oftentimes deadly. Further, these infections are
- 12 often linked to the microbiome. And then finally, you
- 13 know, we view this opportunity to study the microbiome
- 14 in this patient population but likely would be
- 15 generalizable to other patient populations reaching
- 16 thousands and thousands of people. Next slide.
- 17 So to assess the microbiome in this
- 18 patient population and its contribution to infection,
- 19 we performed shotgun metagenomic sequencing of stool
- 20 samples in the postoperative period and we organized
- 21 them based on infection and no infection. Each
- 22 vertical column you see here is a single stool sample

- 1 collected from a patient and each color within each
- 2 vertical column is a unique organism.
- 3 You'll see immediately the dark green
- 4 color that represents enterococcus. The bright red
- 5 color that you see represents proteobacteria. This
- 6 contains the family Enterobacterales, things like E.
- 7 coli and klebsiella, and then many of the other
- 8 colors, the pinks, the cyans, the purples, and the
- 9 browns, these are obligate anaerobic bacteria that are
- 10 generally regarded as healthy members of the
- 11 microbiome.
- 12 If you look sort of in the middle of
- 13 the right side, you'll see some stool samples that
- 14 have sort of a rainbow of appearance of multiple
- 15 different colors of these anaerobes and these stool
- 16 samples would be the closest to what we would consider
- 17 to be normal microbiome.
- And then finally at the bottom each one
- 19 of these colored squares, the green colored squares
- 20 represents an enterococcus infection and the red
- 21 colored squares represents an Enterobacterales
- 22 infection. And to determine the association between
  - Page 163
- 1 colonization and infection in this group, we ordered
- 2 these stool samples based on relative abundance of
- 3 enterococcus where on the far left you see stool
- 4 samples that have a normal microbiome essentially
- 5 completely replaced with a single organism of
- 6 enterococcus and then gradation from there.
- 7 And then if you draw your attention to
- 8 the enterococcus infection column, you'll see that
- 9 nearly every single enterococcus infection experienced
- 10 in our study occurred in patients who have expansion
- 11 of these enterococci within their stool microbiota.
- 12 Next slide, please.
- We then did the same reordering, but
- 14 now focusing on Enterobacterales, and we see a similar
- 15 trend where Enterobacterales expansion sometimes even
- 16 complete domination of the microbiome occurs and is
- 17 associated with an infection caused by these
- 18 Enterobacterales.
- The other thing that you may have
- 20 noticed is there are patients in the no infection
- 21 group who also experience expansion and domination
- 22 with these taxa, suggesting that while expansion may

- Page 164
- 2 raising hypotheses that perhaps other residual
- 3 microbiota may be preventing infection and defending

1 be necessary for infection, it might not be sufficient

- 4 these patients from infection. Next slide, please.
- 5 So to better determine the exact
- 6 association between the colonization, expansion, and
- 7 then subsequent infection, we created two receiver
- 8 operator curves with Enterobacterales and enterococcus
- 9 colonization and then associating that with infection.
- 10 And here we see a very strong association with areas
- 11 under the curve approaching 90 percent and then 80
- 12 percent for Enterobacterales.
- We then optimized the cut point at the
- 14 degree of expansion necessary to highest predisposed
- 15 towards infection, and here we see that an expansion
- 16 at a level of between 5 and 6 percent is actually
- 17 associated with that significant increase in risk for
- 18 infection. While those 90 percent expansions are
- 19 impressive, perhaps the 5 percent threshold is what's
- 20 important. And finally at these thresholds we found
- 21 an odds for infection to be significantly elevated in
- 22 the expanded patient populations, reaching an odds
  - Page 165
- 1 ratio of up to 50 in the enterococcus group, and
- 2 again, that's a 50-fold increase in risk for
- 3 infection.
- 4 Now these numbers are somewhat
- 5 disconcerting in terms of risk for infection with
- 6 colonization, but if you flip this on its head and
- 7 view this as an opportunity where we can use
- 8 microbiome therapies to suppress expansion of these
- 9 taxa down below this 5 percent threshold, we have the
- 10 opportunity to reduce the risk for infection up to 50-
- 11 fold in these patients. And again that's a reduction
- 12 that would be really revolutionary compared to other
- 13 therapies with much less magnitude for benefit. Next
- 14 slide, please.
- 15 So next steps within our research
- 16 endeavors is to recognize that these organisms aren't
- 17 just existing within the colons and the stool of our
- 18 patient, but that these organisms are active. They're
- 19 doing things. They're competing with each other and
- 20 they're interacting with the host.
- 21 So here we looked at the microbiome
- 22 derived metabolites in the stool and you'll see here

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- 1 on the top right of this figure, these are metabolites
- 2 that are enriched in our patients who managed to
- 3 escape getting infected. And while we don't have time
- 4 to discuss each of these individual metabolites, we
- 5 know that they are produced by the microbiome and many
- 6 of these compounds have been implicated in health.
- 7 Notably the top five on the right, indole,
- 8 desaminotyrosine, and tryptamine have been implicated
- 9 in boosting enterocites mucosal barrier, inducing host
- 10 production of antimicrobial peptides, and then finally
- 11 immunomodulation and avoiding excess inflammation
- 12 within the gut. Next slide, please.
- 13 So you know as we move forward on
- 14 understanding the relationship between the microbiome
- 15 and hospital acquired infections and multiple drug
- 16 resistant infections, these questions rise. Who are
- 17 they? How many? What are they doing? But I think
- 18 most importantly is how can we return to normal, how
- 19 can we suppress these pathogens back to low levels and
- 20 reestablish those anaerobic consortias, and at the
- 21 University of Chicago, the Duchossois Family
- 22 Institute, we are currently working on developing a
  - Page 167
- 1 discrete healthy microbiome consortia using good
- 2 manufacturing practices that will engraft into our
- 3 high risk patients, will restore their microbiota,
- 4 will reestablish colonization resistance, will
- 5 suppress pathogen abundance, and will ultimately
- 6 prevent infection. And with that, thank you so much
- 7 for all of your time. Next slide, please.
- 8 I'd like to thank the Duchossois Family
- 9 Institute, University of Chicago, my mentor Dr. Pamer,
- 10 and so many other mentors, collaborators who have
- 11 helped progress this work and are continuing to work
- 12 on those future projects. I thank the CDC and FDA for
- 13 organizing this presentation, this workshop, and to
- 14 all of the audience for your thoughts and
- 15 considerations. And with that, I will turn it back to
- 16 the moderators.
- 17 TIMOTHY BENSMAN: Wonderful. Well
- 18 thank you, Dr. Lehmann for sharing some of your
- 19 clinical research findings. This concludes this
- 20 morning's session. Dr. Smith and I want to thank all
- 21 the speakers this morning for their excellent
- 22 presentations. They were very comprehensive,

- 1 informative, and thoughtful which is no small feat
- 2 with the time restrictions you all faced.
- 3 It's now time for the lunch break, so
- 4 feel free to answer the poll questions as it comes up,
- 5 but do rejoin us at 12:30 for Session 2 talks.
- 6 (Break)

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- 7 DR. JOHN JERNIGAN: -- get started with
- 8 our first afternoon session which will be covering the
- 9 regulatory perspective and trial design challenges and
- 10 considerations. My name is John Jernigan, chief of
- 11 the Epidemiology Research and Innovations Branch in
- 12 the Division of Healthcare Quality Promotion at CDC,
- 13 and I'll be co-moderating this session along with Dan
- 14 Rubin from FDA and I'll turn it over to Dan now to get
- 15 it started. Dan.
- 16 DR. DAN RUBIN: Good afternoon. My
- 17 name is Dan Rubin. I'm a co-moderator for this
- 18 session, and I'm a statistical team leader in the
- 19 Office of Biostatistics at CDER FDA.
- 20 Our first speaker for this session is
- 21 Heidi Smith. Dr. Smith is a clinical team leader in
- 22 the division of anti-infectives in the Center for Drug

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- 1 Evaluation and Research at FDA, where she is involved
- 2 in the review and regulation of products intended for
- 3 the treatment and prevention of infectious diseases.
- 4 Over.
- 5 Heidi, I think you're on mute.
- 6 DR. HEIDI SMITH. Thank you. Double
- 7 muted. We can go ahead and move on to the next slide.
- 8 All right, a brief outline of the
- 9 presentation. So I'm going to start with some context
- 10 on HAIs and the clinical context of what we'll be
- 11 covering, standards for approval. We'll delve into
- 12 the characteristics of adequate and well-controlled
- 13 trials and then go through some illustrative examples
- 14 of drugs to prevent surgical site infections, drugs to
- 15 reduce the incidence of catheter-related bloodstream
- 16 infections, and then talk a little bit about safety
- 17 database confederations. Next slide, please.
- 18 So as was discussed in much more detail
- 19 this morning, healthcare-associated infections are
- 20 broadly defined as infections that develop while
- 21 receiving healthcare or shortly thereafter, and it
- 22 includes catheter associated bloodstream infections,

1 catheter associated UTIs, surgical site infections,

2 and ventilator associated pneumonia.

3 And as I've also noted the pathogens

4 responsible frequently develop antimicrobial

5 resistance. The drugs developed to prevent or reduce

6 the incidence of HAIs may have different clinical

7 development pathways. Next slide, please.

8 So before we talk more details about

9 the statutory standards for drug approval, it

10 sometimes helps to take a step back and recall where

11 these statutes came from. So this photo is actually

12 showing President Kennedy signing the 1962 amendment

13 to the food -- the federal Food Drug and Cosmetic Act,

14 and these were also known as the Kefauver-Harris

15 amendments.

They established the framework that

17 required drug manufacturers to prove scientifically

18 that a drug was not only safe but also effective. I

19 also like this picture because the only woman in the

20 room in this picture is Frances Kelsey, who was the

21 FDA medical officer who was very instrumental in

22 preventing thalidomide from coming to the market in

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1 a valid comparison with a control in order to affect a

2 drug's effect. Next slide, please.

3 In the CFR, there's these seven

4 characteristics laid out of adequate and well-

5 controlled trials. These trials have a clear

6 statement of objectives and a proposed method of

7 analysis. They permit valid comparison with a control

8 so that a quantitative assessment of the drug's

9 effects can be made. They have a method of selecting

10 subjects that provides assurance that they have the

11 disease that's being studied or in the case of a

12 preventative treatment, that there's evidence of

13 susceptibility and exposure to the disease to be

14 prevented.

15 The method of assigning -- assignment

16 to study arm minimizes bias and is intended to ensure

17 comparability between the treatment groups. Measures

18 to minimize bias on the part of the subject,

19 observers, and analysts of the data are incorporated

20 into the trial design. There's a method for assessing

21 treatment response that's well defined and reliable.

22 And the analysis of the results is adequate to assess

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1 the U.S. because she had over its data. Next slide,

2 please.

3 Okay, so what do these standards state?

4 So a drug's effectiveness must be established by

5 substantial evidence of effectiveness defined as

6 evidence consisting of adequate and well controlled

7 investigations including clinical investigations. And

8 this is generally interpreted as requiring two

9 adequate and well-controlled trials, each of which is

10 convincing on its own.

Now the Food and Drug Administration

12 Modernization Act amended the provisions to add that

13 the FDA may consider data from one adequate and well-

14 controlled clinical investigation with confirmatory

15 evidence. Next slide, please.

So let's talk a bit about the

17 definition of adequate and well-controlled trials. So

18 the purpose of these trials is to distinguish the

19 effect of the drug from other influences, spontaneous

20 change, placebo effect, observational biases, and the

21 Code of Federal Regulations describes the trial design

22 elements that are intended to minimize bias and permit

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1 the drug's effect, the analytical methods used, the

2 comparability of the test and control groups, and the

3 effects of any interim analyses.

4 Next slide, please. Can I have the

5 next slide? Is it an anything on your end, because

6 I'm not seeing -- there we go. Perfect. Thanks.

7 That's the one.

8 So since adequate and well-controlled

9 trials has control, let's talk a little bit about some

10 different types of controls that we might see in these

11 trials. So, placebo concurrent control is a

12 comparison to an inactive preparation that's designed

13 to resemble the test drugs. A dose comparison

14 concurrent control has a comparison of at least two

15 different doses of a test drug.

A no treatment concurrent control has a

17 comparison of the test drug with no treatment, but it

18 usually still includes randomization and it's usually

19 only used in situations where the outcome measure is

20 objective and the placebo effect is negligible. An

21 active treatment concurrent control is a comparison

22 with a known effective therapy. And this is usually

- 1 used in situations where placebo or no treatment is
- 2 contrary to the interests of the patient.
- 3 It's worthwhile noting here though that
- 4 with this type of control, the similarity of the test
- 5 drug and the active control can mean either that both
- 6 drugs are effective or that neither drug was
- 7 effective. An analysis of the study should reference
- 8 the evidence for the effectiveness of the control.
- 9 And then finally, historical control of
- 10 the comparison with experience historically derived
- 11 from natural history of disease or results from active
- 12 treatment in a comparable population. This is usually
- 13 reserved for special circumstances such as diseases
- 14 with high predictable mortality or studies where
- 15 effect is self-evident. Next slide, please.
- 16 So trial endpoints. So these -- the
- 17 methods that are assessing the response to the drug
- 18 should be well defined and reliable and the endpoints
- 19 should be clinically meaningful. The most common type
- 20 of endpoint that we're dealing with is a clinical
- 21 endpoint, as referenced by Dr. Farley early on in the
- 22 workshop, these are characteristics or variables that

- Page 1
- 1 validated surrogate endpoint and this endpoint would
- 2 have data including some clinical trials and
- 3 epidemiologic studies that demonstrates its ability to
- 4 predict a clinical benefit.
- 5 Accelerated approval, on the other
- 6 hand, can be supported by adequate and well-controlled
- 7 trials establishing an effect on a surrogate endpoint
- 8 that is reasonably likely to predict clinical benefit
- 9 based on epidemiologic, therapeutic, pathophysiologic,
- 10 or other evidence or on the basis of an effect on the
- 11 clinical endpoint other than survival or irreversible
- 12 morbidity.
- Now, in the case of accelerated
- 14 approval, this requires that the applicant study the
- 15 drug further, can vary and describe its clinical
- 16 benefit where there is uncertainty as to the
- 17 relationship of the surrogate endpoint to the clinical
- 18 benefit or the observed clinical benefit to the
- 19 ultimate patient outcome.
- The FDA does maintain a public list.
- 21 Listed in -- the link is in the hyperlink at the
- 22 bottom of the side of surrogates that have been used

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- 1 directly measure a therapeutic effect, the effect on
- 2 how the patient feels, functions, or survives.
- 3 It's important to note in the context
- 4 of what we're discussing today that medical biologic
- 5 outcomes are not clinical endpoints.
- 6 We can also use validated surrogate
- 7 endpoints. So these are endpoints that are supported
- 8 by clear mechanistic rationale as well as critical
- 9 data that provide strong evidence that the effect on
- 10 the surrogate predicts a specific clinical benefit.
- 11 Next slide, please.
- 12 So 03:18:15 a little bit more detail
- 13 on surrogate endpoints. So as Dr. Farley had
- 14 mentioned, surrogate endpoints are used as a
- 15 substitute of a direct measure of our patients feel,
- 16 function, or survive. So they must be supported by
- 17 evidence that show that they can be relied upon to
- 18 predict a clinical benefit.
- 19 And in terms of approval based on
- 20 surrogate endpoints, there's two potential pathways.
- 21 Traditional approval can be supported by adequate and
- 22 well-controlled trials that establish an effect on a

- 1 as a basis of approval. We should note though that
- 2 the acceptability of these surrogate endpoints for use
- 3 in a particular drug development program is determined
- 4 on a case-by-case basis and it is context dependent:
- 5 the disease, the patient population, the mechanism of
- 6 action of the drug, and the availability of other
- 7 approved treatments. Next slide, please.
- 8 So trial objectives. The two primary
- 9 types of studies that we'll be evaluating are
- 10 superiority trial and this would be a study that
- 11 demonstrates efficacy by showing that the test drug us
- 12 superior to control. And generally this provides the
- 13 strongest evidence of effectiveness.
- 14 The other primary type of trial we
- 15 evaluated is non-inferiority trials and these
- 16 demonstrate efficacy by showing that the test drug is
- 17 not effective less effective than the active control
- 18 by more than a predefined amount or the NI margin, the
- 19 non-inferiority margin. But these types of trials
- 19 non-interiority margin. But these types of trials
- 20 rely upon the assumption that's not confirmed in the
- 21 trial itself that the control had its anticipated
- 22 effect, which is the basis for the NI margin. Next

1 slide.

2 So these are a couple illustrative

3 examples starting with drugs to prevent surgical site

4 infections or SSI. So did a compare and contrast two

5 types of development programs, one for a topical

6 antibacterial for staph aureus nasal decolonization

7 and another for systemic antibacterial for peri-

7 and another for systemic antibacteriar r

9 So for both of these types of

8 operative prophylaxis.

10 development programs, the trial endpoint is likely to

11 be surgical site infection incident. But in the case

12 of a topical antibacterial for staph aureus nasal

13 decolonization, there's inconsistent data on whether

14 nasal decolonization alone results in reduction in

15 surgical site infection. So this is going to require

16 an assessment relative to placebo, because there's no

17 active comparator with demonstrated efficacy.

18 In contrast, for systemic antibacterial

19 for peri-operative prophylaxis, there's multiple

20 trials demonstrating reduction in surgical site

21 infection when peri-operative antibiotic compared to

22 placebo or no treatment. This allows the

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1 justification of an NI margin that can be used for an

2 active comparative controlled non-inferiority trial.

3 Next slide, please.

4 So going into a few more details,

5 starting with the example of a topical antibacterial

6 for nasal staph aureus decolonization. So the

7 published literature regarding the clinical benefit of

8 nasal staph aureus decolonization is not conclusive.

9 Studies to date have not demonstrated a consistent

10 outcome for the prevention of surgical site infection.

11 Most of the studies reporting a clinical benefit have

12 used bundled nasal and skin decolonization strategies

13 so determination of the benefit of the nasal

14 decolonization alone is not possible.

15 Other limitations have included

16 heterogeneity in the patient populations, differences

17 in the reported endpoints and treatment effect, and

18 variable methodological quality. Next slide, please.

19 So some of the trial design

20 considerations for the development of a product like

21 this would include the choice of control would likely

22 be a placebo vehicle which could control for the

1 physical effects of the topical application of the

2 product as well as blinding. Patient selection

3 considerations would include potential enrichment for

4 staph aureus carriers and surgical population, the

5 highest risk of surgical site infection.

6 Concomitant prophylaxis measures that

7 should be controlled for would be things like timing

8 and the type of skin decontamination and the use of

9 systemic peri-operative antibacterials. Randomization

10 could be cultural randomization by hospital or by

11 surgical unit or by individual patients.

12 Clinical endpoints. Primary endpoints

13 would likely be incidence of surgical site infections,

14 incidence of all infections due to staph aureus and/or

15 mortality. And secondary endpoints that could be

16 considered would include hospital length of stay,

17 readmission rates, or reoperation rates. And the

18 endpoint analysis is likely superiority of the

19 treatment to placebo. Next slide, please.

20 Looking a little bit deeper at systemic

21 antibacterial for peri-operative prophylaxis to

22 prevent SSI, there are multiple trials in the

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Page 180

1 published literature that demonstrated clinical

2 benefit relative to placebo or no treatment in

3 surgical procedures with high rates of infection,

4 clean-contaminated or contaminated procedures.

5 And one example from The Lancet in 1979

6 is a randomized double blind placebo controlled single

7 center trial where patients undergoing elective

8 colorectal surgery were randomized to IV metronidazole

9 or placebo dosed immediately prior to surgery and then

10 repeated at eight and 16 hours. For both groups, the

11 preoperative, bowel preparation was identical and the

12 endpoint evaluated was the overall surgical site

13 infection incident. They found 34 percent in the

14 metronidazole arm and 77 percent in the placebo arm.

15 Next slide, please.

So there are multiple parenteral

17 antibacterials that have been FDA approved with an

18 indication for surgical site infection prophylaxis in

19 clean contaminated and potentially contaminated

20 procedures such as those listed here. Next slide,

21 please.

22 So the types of trial design

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- 2 this for a selection of a control, an active control
- 3 could be used for surgical procedures with established

1 considerations for the development of a product like

- 4 efficacy in surgical site infection prevention. A
- 5 placebo control might be considered for procedures
- 6 without a demonstrated efficacy.
- 7 For patient selection, considerations
- 8 would include the type of surgical procedure, the
- 9 similarity to the population in which efficacy was
- 10 demonstrated by the comparator, as well as enrichment
- 11 strategies for patients at highest risk of surgical
- 12 site infections.
- 13 Concomitant prophylaxis measures could
- 14 include also timing and type of skin decontamination
- 15 as well as bowel prep. Randomization, again, could be
- 16 cluster or individual patient. Clinical endpoints,
- 17 likely incidence of surgical site infection and
- 18 mortality with consideration of secondary endpoints
- 19 for length of stay, readmission rates, and reoperation
- 20 rates.
- 21 Endpoint analysis would be superiority
- 22 to control or non-inferiority to an active control,

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- 1 without adequate justification for the NI margin.
- 2 Next slide, please.
- 3 Then looking at a slightly different
- 4 illustrative example, we could look at an
- 5 antibacterial to reduce the incidence of catheter-
- 6 related bloodstream infections. So we could consider
- 7 an antibacterial, locally administered in a catheter
- 8 lock solution. So while there are FDA approved
- 9 catheter lock solutions that include saline solutions
- 10 that physically occupy the catheter space to provide a
- 12 reduce the incidence of clotting, and antibacterial
- 13 could be evaluated as an add-on to the catheter lock
- 14 solution containing saline plus or minus an
- 15 anticoagulant and compared to a control lock solution
- 16 that had an otherwise identical composition. Next
- 17 slide, please.
- 18 So the types of trial design
- 19 considerations for this type of product development
- 20 could include for selection of control, there's no FDA
- 21 approved antibacterial catheter lock solution, but
- 22 once they consider an active control with an FDA

1 approved anticoagulant catheter lock solution

- 2 evaluating the antibacterial as add-on therapy or a
- 3 placebo control with a saline solution.
- 4 Patient selection. So take in account
- 5 factors such as the catheter type, whether it's a
- 6 long-term catheter or short-term catheter use, the
- 7 catheter function -- hemodialysis, nutrition, chemo
- 8 (indiscernible) -- and enrichment for patients at
- 9 highest risk of infection such as those who have past
- 10 history of infection, more frequent access of the
- 11 catheter.
- 12 Concomitant prophylaxis measures to
- 13 control for would be things like protocols for aseptic
- 14 technique, whether chlorhexidine-gluconate impregnated
- 15 sponges or other dressings are used, or
- 16 standardization of tubing changes.
- 17 And then clinical endpoints would be
- 18 catheter-related bloodstream infection incidence,
- 19 catheter loss, mortality. Consideration of secondary
- 20 endpoints to evaluate potential effects of clotting,
- 21 catheter patency. And then finally endpoint analysis
- 22 would be superiority to control. Next slide, please.

- 1 Then finally safety database
- 2 considerations. Approval decisions requires both a
- 3 finding of substantial evidence of effectiveness and
- 4 the determination that the drug is safe for its
- 5 intended use. The benefits of the drug must outweigh
- 6 its risks under the conditions of use defined in the
  - 7 labeling.
  - 8 For drugs used as prophylaxis or
- 9 reduction of incidence of infection, the benefit may
- 10 only be experienced by a fraction of the treated
- 11 hydraulic lock plus or minus an anticoagulant drugs to 11 patients, that subset who would have developed the
  - 11 patients, that subset who would have developed the
  - 12 disease without the prophylactic intervention. And in
  - 13 these cases a larger safety database would generally
  - 14 be required for a drug intended for prophylaxis of a
  - 15 serious infection than a drug intended for treatment
  - 16 of a serious infection.
  - 17 And then finally, just to sum up what
  - 18 we've talked about, products developed for prevention
  - 19 of healthcare-associated infections can have diverse
  - 20 modes of delivery and mechanism of action. The
  - 21 approval of an indication for prevention of
  - 22 healthcare-associated infection requires demonstration

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1 of efficacy using a clinically meaningful endpoint or

- 2 validated surrogate and an adequate safety database to
- 3 determine whether the benefits of the drug outweigh
- 4 its risk for the use defined in the labeling. Thank
- 5 you.
- 6 DR. DAN RUBIN: Great. Thank you, Dr.
- 7 Smith, for that great review. Our next talk is
- 8 entitled Regulation of Healthcare Antiseptics and will
- 9 be presented by Dr. Theresa Michele. Dr. Michele is
- 10 currently the director of the Office of
- 11 Nonprescription Drugs in the Center for Drug
- 12 Evaluation and Research at the FDA. Among other
- 13 drugs, the ONPD is responsible for regulating
- 14 healthcare and consumer antiseptics. Dr. Michele.
- 15 DR. THERESA MICHELE: Thank you so much
- 16 and good afternoon, everyone. It's really a pleasure
- 17 to be here today as part of this important workshop on
- 18 prevention of healthcare-associated infections. Now
- 19 because topical antiseptics are often considered part
- 20 of the armamentarium of infection prevention tools,
- 21 it's useful to understand some of the background on
- 22 these products when considering development of new HAI
  - Page 187
- 1 prevention strategies.
- So over the next 15 minutes or so I'll
- 3 be providing just a very high level overview of the
- 4 regulation of healthcare antiseptics which is a bit
- 5 more complicated than the typical prescription drugs.
- 6 Next slide.
- 7 This is the usual FDA Disclaimer.
- So when we talk about antiseptics we
- 9 typically divide them into categories based on
- 10 indication which the -- with the two largest area is
- 11 being consumer antiseptics and healthcare antiseptics
- 12 So for the purposes of today's talk, I'll primarily be
- 13 discussing patient preoperative skin preparations
- 14 which fall under the healthcare antiseptic category.
- 15 The other products in this category are primarily
- 16 intended to be used on the hands of healthcare
- 17 personnel, not on patients.
- 18 So despite the indication for use in
- 19 the healthcare setting, these are all nonprescription
- 20 drugs; although, the healthcare products are typically
- 21 marketed to hospitals and to clinicians in other
- 22 healthcare settings rather than to the general public.

1 Next slide.

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- 2 There are two different ways to bring
- 3 an OTC drug to market in the U.S.: the new drug
- 4 application and the abbreviated new drug application
- 5 or NDA and ANDA process, and then the OTC monograph
- 6 process. These two processes are quite different.
- 7 Patient preoperative skin preparations are actually
- 8 marketed under both processes. So under the NDA
- 9 process, which is how most prescription drugs come to
- 10 the market, an application for the drug is submitted
- 11 to FDA for approval and the application includes
- 12 information about the safety and effectiveness of the
- 13 drug, which you just heard about from Dr. Smith.
- 14 So the drug can't be marketed until FDA
- 15 approves that application for the drug. The NDA is
- 16 specific for a particular drug product including its
- 17 formulation, its dose, its use, and its labeling. In
- 18 contrast to the NDA process, an OTC monograph drug can
- 19 be marketed without FDA approval if the drug complies
- 20 with all of the requirements in section 505(g) of the
- 21 federal Food Drug and Cosmetic Act which was added by
- 22 the CARES Act as well as applicable conditions of its

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- 1 therapeutic category-specific OTC monograph. That's a
- 2 mouthful, and we'll talk about what an OTC monograph
- 3 is exactly in just a moment.
- 4 So except for any final formulation
- 5 testing specified in the relevant monographs, a
- 6 manufacturer that's following the OTC monograph does
- 7 not need to provide safety and effectiveness data of
- 8 each individual drug product. This is because OTC
- 9 monographs established conditions including the active
- 10 ingredients under which an OTC drug is considered
- 11 generally recognized as safe and effective or GRASE,
- 12 and does not require FDA approval prior to marketing.
- 13 Next slide, please.
- 14 So what's a monograph? Well, an OTC
- 15 monograph is kind of a rule book. It lists the
- 16 conditions of each therapeutic category that describes
- 17 the active ingredients, the uses or indications, the
- 18 doses, route of administration, labeling, and testing
- 19 for an OTC drug to be recognized as GRASE. So drugs
- 20 that are GRASE and meet other requirements in Section
- 21 505(g) of the act can be marketed without a new drug
- 22 application and FDA premarket approval.

Meeting Page 190 Page 192 1 The monograph remains one of the 1 are regulated in the United States. 2 OTC monograph reform changes the 2 largest and most complex regulatory programs ever 3 undertaken at FDA. Over 100,000 different OTC drug 3 process for revising, issuing, amending, and 4 finalizing OTC monographs from the three phase public 4 products are marketed under the OTC monographs in the 5 U.S. These monographs or rule books cover 5 notice and comment rulemaking process to a new much 6 approximately 800 different active ingredients for 6 more facile administrative order process. The 7 over 1,400 different uses. Next slide. 7 administrative order process still involves public This slide compares and contrasts the comment and is still largely a public process. 9 two systems. I'll give you just a moment to look at 9 Under the CARES Act, OTC monograph 10 this and note that these slides are available on the 10 healthcare antiseptics can continue to be marketed if 11 website after the presentation if you want to read 11 they follow the 1994 Antiseptics Tentative Final 12 this in more detail. The most important takeaway here 12 Monograph, as further amended by the 2015 Health Care 13 is that the NDA process is product specific, while the 13 Antiseptics proposed rule and other applicable 14 monograph process is therapeutic category specific. 14 requirements. Next slide. 15 So in order to qualify for monograph 15 So currently all monograph active 16 status, a product has to fulfill all of the 16 ingredients require additional data to determine 17 indications laid out in the monograph in terms of its 17 whether they are generally recognized as safe and 18 effective or GRASE for use in healthcare antiseptics. 18 active ingredients, indication, labeling, et cetera. 19 Now while certain flexibilities are permitted under 19 And we're currently working with manufacturers to help 20 the monograph such as in inactive ingredients, if a ensure they provide the data necessary to make a GRASE 21 product differs in any way from the prescribed 21 determination for these ingredients. 22 22 monograph conditions, that product requires a product It's the manufacturer's responsibility Page 191 Page 193 1 specific NDA or an OTC monograph order request to 1 to ensure that their products have been properly 2 tested, comply with applicable -- goodness -- comply 2 change the monograph before it can be marketed. Next 3 with applicable regulations and have inactive 3 slide. 4 4 ingredients that are safe and suitable for use in an Currently for patient preoperative skin 5 OTC healthcare antiseptic. Next slide. 5 preparations, there are six active ingredients that 6 may be marketed under the monograph. These include So this is an example of some of the

- 7 labeling for a patient preoperative skin preparation.
- 8 Both NDA and monograph products carry similar
- 9 labeling. I show this to point out that the
- 10 indication for these products is for preparation of
- 11 the skin prior to surgery to help reduce bacteria that
- 12 can potentially cause skin infection.
- 13 Note that there are no approved
- 14 antiseptic products for the prevention of other
- 15 infections or for repeated use. Also note that the
- 16 products are intended for external use only on intact
- 17 skin, not in the eyes and the ears and the mouth and
- 18 the nose or in any other orifice. Next slide.
- 19 So testing for a preoperative
- 20 antiseptic is based on the labeled indication and use
- 21 which again is for use prior to surgery for the
- 22 reduction of bacteria on the skin that can potentially

- 7 alcohol, povidone iodine, benzalkonium chloride,
- 8 isopropyl alcohol, benzethonium chloride, and
- 9 chloroxylenol.
- 10 Only single-ingredient products are
- 11 permitted under the monograph, and combination
- 12 products require an NDA. While it's possible to
- 13 submit an NDA for a product with any active
- 14 ingredient, currently the primary active ingredient
- 15 found in most NDA patient preoperative skin
- 16 preparations is chlorhexidine. Next slide.
- 17 Recently the monograph process
- 18 underwent significant changes. On March 27th of 2020,
- 19 the Coronavirus Aid, Relief, and Economic Security Act
- 20 or the CARES Act was enacted and the CARES Act
- 21 included important statutory provisions that reform
- 22 and modernize the way over the counter monograph drugs

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1 cause skin infection. So efficacy testing for

2 preoperative antiseptics includes both in vitro tests

3 and in vivo simulation testing. Testing follows the

4 directions from for use, which I just showed you, and

5 these directions generally state to allow the product

6 to dry completely and do not rinse.

7 I'll review the required efficacy

8 testing in a moment, and while I'm not going to review 8 studies. These studies are based on a surrogate

9 the safety data as part of this presentation, I do

10 want to point out that the data that we have and that

11 we have requested to support safety of these agents is 11 as reduction in the number of infections.

12 limited to this specific indicated use.

13 It's a common misperception that

15 long time and that they have a general indication that

16 data supporting approval is extremely broad, which is

17 just not the case. So testing of these products does

18 not currently include viruses, reduction of systemic

19 infections, or prevention of any specific infection,

20 repeated use, use over a large surface area, us in

21 infants and neonates where there are potential issues

22 with absorption, use on other than intact skin, use

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- 1 for pre-catheterization or any of a variety of other
- 2 uses that people use these things for.
- 3 This isn't to say that doctors cannot
- 4 use products in clinical practice for things that go
- 5 beyond the label. We all know this happens every day,
- 6 especially with these products. That falls under the
- 7 practice of medicine, which is not regulated by FDA.
- 8 What I just want everyone to be aware
- 9 of is the limitations of the data supporting approval
- 10 of these products, so that as we discuss options for
- 11 developing tools to reduce HAIs we consider what
- 12 additional information might be needed to provide
- 13 specific evidence to support drug approval for such
- 14 use. Next slide.
- 15 In vitro efficacy testing for
- 16 preoperative skin preparation antiseptics is designed
- 17 to demonstrate the product spectrum and kinetics of
- 18 antimicrobial activity by looking at the spectrum of
- 19 activity against recently isolated normal flora and
- 20 cutaneous bacterial pathogens.
- Testing is generally for MIC or MBC
- 22 testing of 25 representative clinical isolates and 25

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- 1 ATCC reference strains followed by time kill testing
- 2 of each of the bacteria tested in the MIC or MBC. So
- 3 a complete list of these strains can be found in the
- 4 healthcare antiseptic proposed rule at the reference
- 5 listed on this slide. Next slide.
- 6 So products that show adequate in vitro
- 7 testing then go on to clinical simulation efficacy
- 9 endpoint of the number of bacteria removed from the
- 10 skin rather than on a clinical outcome endpoint such
- 12 This simulation follows a prescribed
- 13 protocol with a single application of the product on a
- 14 because these antiseptics have been around for a very 14 dry skin site and a moist skin site such as the groin
  - 15 or axilla which generally has higher numbers of
  - 16 resident bacteria than the dry skin sites. The
  - 17 primary endpoint compares the test product to both a
  - 18 vehicle or negative control and a positive control,
  - 19 and it must demonstrate a superiority margin of 1.2
  - 20 log reduction over the negative control in both sites
  - 21 after 30 seconds or 10 minutes.
  - 22 In addition, the bacterial counts may

- 1 not exceed baseline at six hours. The use of the
- 2 surrogate endpoint of clinical simulation studies to
- 3 support this particular indication was discussed at a
- 4 public advisory committee which agreed with the
- 5 proposal. Next slide.
- 6 So this covers a very high overview of
- 7 the regulation of healthcare antiseptics in general
- 8 and preoperative skin preparations in particular. Now
- 9 I glossed over a lot of information so I would
- 10 encourage anyone who wants to take a deeper dive into
- 11 this topic to review the rule makings that I pointed
- 12 out earlier as well as our website on healthcare
- 13 antiseptics that's listed here. I'll also leave you
- 14 with some additional resources on related topics that
- 15 may be of interest, and I thank you very much for your
- 16 attention.
- 17 DR. DAN RUBIN: Thank you very much for
- 18 your presentation, Dr. Michele. Our next speaker is
- 19 Paul Carlson. Dr. Carlson is a principal investigator
- 20 in the Laboratory of Mucosal Pathogens and Cellular
- 21 Immunity, Division of Bacterial, Parasitic, and
- 22 Allergenic Products, Office of Vaccines Research and

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- 1 Review in CBER, FDA. His researched FDA has focused
- 2 on infections caused by the enteric pathogens,
- 3 Clostridioides difficile and vancomycin-resistant.
- 4 Enterococci species as well as fecal microbiota
- 5 transplantation and bacteriophage therapeutics. Over.
- DR. PAUL CARLSON: Hi. Thanks for the
- 7 introduction and for the invitation to speak today.
- 8 I'm not going to be talking about any of my research
- 9 today. I'm going to talk about regulation of these
- 10 particular product classes that we've lumped together
- 11 here to call microbiome based therapeutics. Next
- 12 slide, please.
- 13 Just my quick disclaimer. My comments
- 14 are my own. Slides are always approved, but anything
- 15 I say particularly later in response to questions will
- 16 not -- id not.
- 17 Quick outline. I'm going to go over
- 18 very briefly some aspects of IND or investigational
- 19 new drug applications that are relevant for these
- 20 products. And then I'm going to get into CMC
- 21 considerations for fecal microbiota transplantation or
- 22 FMT and live biotherapeutic products, both of which

1 develop.

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- 2 So again CGMP has to be done because it
- 3 ensures that the drug is safe, has adequate identity,
- 4 strength, meets the quality and purity characteristics
- 5 that it purports or is represented to possess.
- 6 However, for Phase 1, CGMP is not the same as what it
- 7 might be for later phases. And really what this means
- 8 is you have to have some control over how you're
- 9 manufacturing the product. But can you manufacture
- 10 your Phase 1 material in a research laboratory? Yes.
- 11 Can you do it in my research laboratory with
- 12 enterococcus and C. diff floating around? No.
- 13 So, you know, there are ways these
- 14 things are done and we work with you as part of the
- 15 IND process and to work on manufacturing and ensure
- 16 that the product is going to be safe. Next slide,
- 17 please.
- 18 All right. So from here, I'm going to
- 19 move into CMC considerations for these two product
- classes, starting with FMT. Next slide, please.
- 21 So this is a brief history of FMT at
  - 22 the FDA, noting that I arrived in 2015 so I can't be

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- 1 have been mentioned previously today. Next slide.
- And so briefly, IND, as I said,
- 3 investigational new drug application exempts the
- 4 investigational drug from premarketing approvals. You
- 5 can lawfully ship it. Basically, if you want to use a
- 6 drug that is not licensed in people and as part of a
- 7 trial or for any other purposes you need an IND. Next
- 8 slide, please.
- Our primary objectives throughout all
- 10 stages of this review is to assure the safety and
- 11 rights of the subjects that are part of the
- 12 investigation and in later phases to also include
- 13 evaluation of effectiveness and safety. Next slide,
- 14 please.
- 15 All right, so here's one of the key
- 16 questions that I get asked all the time. Do we need
- 17 to use CGMP manufacturing practices? Does it have to
- 18 be full CGMP? Do you have to pay the CMO, you know,
- 19 half a million dollars to get into Phase 1 and the
- 20 answers are yes and no. Everything has to be done
- 21 under good manufacturing practices; however, what that
- 22 means could change throughout the course of product

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- 1 blamed for everything. Briefly here, and in May of
- 2 2013 the FDA and NIH called a public workshop that was
- 3 attended by just about everyone in the field or all
- 4 parts of the field were certainly represented. And at
- 5 this particular the workshop the FDA noted the use of
- 6 FMT and clinical studies to evaluate its safety and
- 7 effectiveness were subject to the regulation by FDA.
- 8 And I've heard a lot of people say in
- 9 2013 the FDA decided that no that's not how -- it's
- 10 always been this way. This is a drug. But this was
- 11 when it was made clear to everyone that INDs were
- 12 going to be required or have been required.
- 13 Now there were concerns from many
- 14 people regarding the situation with C. diff and the
- 15 use for C. diff and the ability to get an IND in and
- 16 for it to be allowed to proceed at a reasonable pace
- 17 and in the sheer number of INDS that would have been
- 18 coming in.
- 19 And so in 2013, we issued a finalized
- 20 guidance issuing a policy of enforcement discretion
- 21 regarding the IND requirements for use of FMT
- 22 specifically to C. difficile infections not responding

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- 1 to standard therapies. This only applies to C. diff,
- 2 to treating C. diff that's not responsive to standard
- 3 therapies and not any other use of FMT.
- All other uses still require an IND.
- 5 This guidance from 2013 is still in effect today and
- 6 this is still policy that we are functioning under.
- 7 We issued two draft guidances subsequent to that.
- 8 Neither of those have been implemented to date. First
- 9 one would have limited enforcement discretion to
- 10 situations where the donor is known to the doctor or
- 11 patient. We received many comments, took those into
- 12 consideration, and chose not to finalize that
- 13 guidance.
- 14 Additionally, in 2016 we issued a
- 15 guidance that would exclude stool from enforcement --
- 16 product enforcement discretion if the stool was
- 17 obtained from a stool bank. So enforcement discretion
- 18 only applies to those not purchasing or obtaining
- 19 product from an entity that would be considered a
- 20 stool bank. Again, this has not been finalized to
- 21 date. Next slide, please.
- 22 All right. So how do we ensure the

- 1 right? What are the long term effects of these
- 2 products? And this is much harder to get at and
- 3 typically beyond the scope of a typical clinical
- 4 trial.

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- 5 And then the last thing I have on your
- 6 side, we characterize these products as we're looking
- 7 for consistency. Are the organisms or consortia that
- 8 matter, specific functions that matter, what's a good
- 9 potency assay. And I can say, I don't think the field
- 10 knows the answers to all of these things right now and
- 11 the majority of the potency assays that we see are
- 12 still CFU per mil or per gram of product, and these
- 13 are estimates of potency because not everything is
- 14 going to grow on those plates. Next slide.
- 15 I think it's just holding the previous
- 16 slide. Next slide again, please. One more. Thank
- 17 you.
- 18 All right. So along with the concerns
- 19 about safety, we have had some safety alerts issued as
- 20 problems have arisen and infections have occurred.
- 21 This slide is actually out of date as of last week.
- 22 We added another one last week. But here you can see,

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- 1 safety of FMTs? Imagine that this is -- this is a
- 2 challenging product to regulate or even to develop.
- 3 It's going to be variable depending on the donor and
- 4 the day, and also has potential significant risks
- 5 associated with it, primarily in terms of infections
- 6 that can be carried along with the product.
- 7 So we look at both intrinsic and
- 8 extrinsic safety. Our primary handle on safety here
- 9 is through donor and stool screening. So we need
- 10 questionnaires to -- and tests to ensure the health of
- 11 the donor. How often should they be tested?
- 12 Should we allow off site donations, is
- 13 one of the things that comes up frequently and I can
- 14 say right now we do not allow any offsite donations.
- 15 One, to ensure chain of custody, and two, to make sure
- 16 we're getting a full handle on the potential symptoms
- 17 that these individuals may have, particularly during
- 18 the COVID-19 pandemic.
- 19 Testing of stool. What should we test
- 20 for? How good our tests? These are both questions we
- 21 think about all the time and also research questions
- 22 in my lab. Intrinsic safety is a little harder,

- 1 had a safety alert regarding the transmission of two
- 2 ESBL E. coli infections from FMT into two individuals,
- 3 one of those two individuals did die as a result of
- 4 that infection and that led to changes in donor
- 5 screening that now require both exclusion of donors
- 6 that are at high risk for carriage of these, of
- 7 various MDROs and also direct testing for them.
- 8 Previously it had been one or the other.
- The next alert after that was one I
- 10 believe was mentioned earlier also, where we had
- 11 instances of transmission of enteropathogenic E. coli
- 12 and Shigatoxin-producing E. coli. The
- 13 enteropathogenic E. coli, we did -- were not requiring
- 14 testing for prior to this. We now do, so that was the
- 15 change that that one pushed us towards. And the
- 16 Shigatoxin-producing E. coli one, it was an
- 17 interesting case because of course we require testing
- 18 for Shigatoxin and for STEC, but now we have to
- 19 require specific testing because in this case they
- 20 were testing by EIA and that missed the particular
- 21 case and so now it's required to be done by nucleic
- 22 acid amplification testing.

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Meeting Page 206 Page 208 1 The next one was a couple of years ago 1 treatment, or cure of disease or condition of human 2 we released the safety alert pertaining to the 2 beings -- so it's a drug -- and three, is not a 3 potential risk of SARS-CoV-2 virus being shed in stool 3 vaccine. Next slide. 4 4 and the potential -- it's known to be shed in stool, So the CMC for these products needs to 5 but the potential risk of that for FMT products, and 5 be such that we have sufficient information to ensure 6 that we know what we're dealing with. We have proper 6 so additional donor screening was required there. And then last week, for those of you 7 identification, quality, purity, and strength of the 8 who have been following this, we did release an 8 drug. And then as development proceeds, we expect 9 additional safety alert regarding the potential risk 9 that that CMC information is going to increase. The 10 of transmission of monkeypox virus after reports the 10 detail is going to be greater and things like assay 11 virus being isolated from -- viable virus being 11 validations and things are going to be provided later 12 isolated from stool of infected individuals and many 12 on the process of drug development. Next slide. 13 instances of both rectal swab and stool samples being 13 So this slide outlines some of the 14 things that should be included as part of the CMC 14 positive. Next slide, please. 15 15 package for this type of drug. You need to know what So this is going to be an ongoing and 16 dynamic list as we move through time and as new 16 the strain is that you're working with. Very simple 17 pathogens emerge, but this is a list of donor 17 and straightforward one. Where did it come from? Is 18 there any information on strain and passage history, 18 screening -- potential donor screening recommendations 19 that we published a couple of years ago. Now you can 19 and note there, it says as available. 20 see in red that about the timing of when this was 20 You don't necessarily have to have 21 published, because those were added after. There's a 21 this, but it's nice if we can understand where this 22 long list of things here. Many of them are always 22 strain is coming from and what the reason for

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Page 209 1 including it the product is, and any relevant genotype

2 or phenotype of information, and ideally you're going

3 to have a full genome sequence of your organism.

4 That's so cheap to do these days that there's really

5 no reason that you wouldn't expect that a sponsor

would have that information.

7 We also need to know the antibiotic

8 resistance profiles for clinically relevant

9 antibiotics both by MIC and potentially looking in the

10 genome to see if there's anything of concern. But in

11 the end, it's really the phenotypic evaluation, so we

12 know what drugs are available to treat these things in

13 the event of a breakthrough infection.

14 We need information on the cell banking

15 systems. Master cell banks, working cell banks,

16 research cell banks, et cetera. Description of the

17 drug substance and drug product manufacturing

18 processes. In these cases a lot of times one product

19 has many substances. If you have 5, 10, 15, 100

20 strains in the product, each one of those might be

21 individual drug substance that is then combined into

22 your final drug product.

1 going to be required under every circumstance.

Some things like say CMV are going to

3 be required if we have concerns about the patient

4 population. It's a challenging one because many

5 people are seropositive but there are ways around that

6 as well. Again, we added STEC by nucleic acid

7 amplification, EPEC, and COVID later, and we have as

8 of today not added a requirement for monkeypox

9 testing, however I think that the addition of donor

10 screening questions and risk assessment will be

11 important in mitigating that risk. Next slide.

12 This is just the paper that I mentioned

13 from the table from the previous slide came from. So

14 if anyone wants to learn a little bit more about that,

15 it's just a slightly more extensive version of the

16 presentation I've just given here. Next slide.

17 So now we're going to move on to live

18 biotherapeutics. Next slide.

19 And live biotherapeutic for the case --

20 for this presentation as defined by CBER is a product

21 that contains live organisms such as bacteria, not

22 limited to bacteria, is applicable to the prevention,

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1 We'll need stability data on your

- 2 product. This is also required for FMT despite the
- 3 fact that I didn't mention it earlier. We need to
- 4 know that the product is stable throughout the course
- 5 of the trial that you are planning and that you're not
- 6 going to have any issues with, you know, product dying
- 7 off, right.
- 8 Just like FMT, you need a potency
- 9 assay. Also like FMT, many times the potency assay
- 10 for these things is going to be a measurement of total
- 11 viable cells. In this case, you can tailor that assay
- 12 to the strains that you're working with, perhaps get
- 13 more accurate numbers. I do want to note there for
- 14 multi-strain products you will need to be able to
- 15 enumerate all strains.
- 16 And this is an instance of where I'm
- 17 talking about the CMC information that's required
- 18 increasing over time. In Phase 1, going to need to
- 19 show that they're all there and have a big picture
- 20 measure of overall potency. But as we move into Phase
- 21 3, you're going to need to be able to enumerate the
- 22 individual strains in your product and provide potency

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- 1 information on each of them and that can get
- 2 complicated, admittedly, as the product size grows.
- 3 Any additional information on
- 4 biochemical or physiochemical properties of the
- 5 product can be provided as part of potency assays and
- 6 will be reviewed as such. Bioburden testing will be
- 7 required in these cases. These are done typically
- 8 under USD Protocols 61 and 62 looking for extraneous
- 9 undesirable bacteria.
- 10 And then additional testing may be
- 11 required depending on the intended population.
- 12 They're at high risk for infection for some reason,
- 13 and any other organisms that are manipulated in the
- 14 same facility. Again, coming back to my lab as the
- 15 extreme example, working with C. diff and VRE would
- 16 not be a good thing for product manufacturing. Next
- 17 slide.
- 18 All right. So we updated our guidance
- 19 on LBPs in 2016 to account for commercially available
- 20 products and the challenges that sponsors were having
- 21 in getting the CMC information. So commercially
- 22 available products, probiotics, do in fact fit the

1 definition of LBPs when they're being used to treat a

- 2 disease. You might get it off the shelf. They're
- 3 meant for safe -- or for healthy populations, not for
- 4 sick individuals. And so in those instances, we need
- 5 to have an IND and we need to have the information --
- 6 sufficient information to product under IND. Next
- 7 slide.
- 8 Because there were challenges getting
- 9 that information and often, you know, the manufacturer
- 10 is not going to be the sponsor of these INDs and the
- 11 manufacturer frequently doesn't have incentive to
- 12 provide the information that we're looking for, we do
- 13 have a method for getting a waiver from the
- 14 requirements for CMC information and I'll outline that
- 15 in this slide and the next slide here, but -- so if
- 16 you had an IND that's utilizing a commercial product,
- 17 you can request a waiver and it will or will not be
- 18 granted.
- 19 If it's not granted, then you have to
- 20 provide full CMC. If it is, then you just have to
- 21 provide the label of product. And on the next slide,
- 22 I will tell you how you get that waiver.

- 1 So the waiver will be granted -- may be
- 2 granted if all four of the following conditions are
- 3 met. So the product and the proposed investigational
- 4 use -- the product for proposed investigational use
- 5 must be lawfully marketed as a conventional food or
- 6 dietary supplement. So it's commercially available.
- 7 Step one.
- 8 Step two, the route of administration,
- 9 dose, patient population, or other factors does not
- 10 significantly increase the risk. It's a pill and the
- 11 label says you say one per day, then that's what
- 12 you're going to do in your trial, then you're probably
- 13 okay as long as there's no reason to be concerned
- 14 about your patient population.
- 15 The investigation is not intended to
- 16 support a marketing application of the live
- 17 biotherapeutic as a drug or biologic product for human
- 18 use in the future. So this is for research studies,
- 19 clinical research studies only.
- And then finally, the investigation is
- 21 otherwise conducted in compliance with IND
- 22 requirements. And then you can get the waiver and

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1 provide us with the label of the product and your

- 2 clinical trial plan as well as part of your IND, and
- 3 then you will likely be able to proceed. Next slide.
- 4 All right, and those things are
- 5 outlined in this paper that was published a few years
- 6 ago now in Microbiology Spectrum and some more
- 7 details. It's really a summary of more up-to-date
- 8 current thinking regarding the things that are in that
- 9 guidance document. Next slide.
- 10 All right. And I will end here with
- 11 some final thoughts. I think you know this meeting
- 12 the microbiome and microbiome-based products have been
- 13 mentioned many times. There are many meetings
- 14 addressing these things around the country and around
- 15 the world frequently, so I think it's very safe to say
- 16 interest in these products is increasing, has
- 17 increased greatly, and will continue to do so.
- 18 And they -- from our perspective,
- 19 CBER's regulatory approach to these products has been
- 20 science based and will continue to be science based
- 21 and we feel that we have allowed and will continue to
- 22 help sponsors get these novel approaches into the
  - Page 215
- 1 clinic to be safely tested and hopefully moved on to
- 2 be approved therapeutics in the near future. Next
- 3 slide.
- 4 I will just leave this up for a minute.
- 5 This is just some additional resources. I think the
- 6 slides are all going to be available after the
- 7 meeting, too, so you can find these in my slide deck
- 8 after the meeting. And with that, I'll turn this
- 9 back over to the moderators. Thank you.
- 10 DR. DAN RUBIN: Thank you very much,
- 11 Dr. Carlson. Our next topic is Clinical
- 12 Considerations and Operational Challenges for
- 13 Prevention Trials and will be presented by Dr. Susan
- 14 Huang. Dr. Huang is professor in the Division of
- 15 Infectious Diseases at the University of California
- 16 Irvine School of Medicine and medical director of
- 17 Epidemiology and Infection control at UCI Health. Dr.
- 18 Huang has led several large randomized clinical trials
- 19 involving decolonization to prevent MDRO disease and
- 20 other HAIs across the continuum of care. Dr. Huang.
- 21 DR. SUSAN HUANG: Thank you. Thanks
- 22 for the opportunity to talk about design challenges

- Page 216
- 1 and operational challenges for HAI prevention trials.
- 2 Next slide.
- 3 So there are some really important
- 4 common features of HAI prevention trials that are
- 5 fairly distinctive, and one is a general desire to
- 6 evaluate what's often a quality improvement strategy.
- 7 And when this occurs, it often has a group focus; that
- 8 is, quality improvement is usually applied at a unit
- 9 level, clinic, hospital, nursing home. Often in this
- 10 case for HAIs, it is targeting a contagious outcome
- 11 and it's generally spurred by an urgent common need.
- Oftentimes, this is because of national
- 13 reporting requirements that bands hospitals and units
- 14 together to try to identify effective solutions and
- 15 therefore it's often under the jurisdiction of
- 16 operational implementation and that often means that
- 17 there are resource constrained funds. Next slide.
- 18 Another key distinction between the
- 19 difference of classical individual randomized control
- 20 trials and these types of pragmatic trials is that
- 21 pragmatic trials are targeting populations and they're
- 22 usually looking for effectiveness. That is, if any
  - Page 217
- 1 hospital were to adopt this, any clinic, how would
- 2 they be eight to be assured that this is a typical
- 3 response that they would see.
- 4 These trials are often minimal risk.
- 5 That means they employ controls that don't use
- 6 placebos and many times they will qualify for a waiver
- 7 of informed consent. Next slide.
- 8 One reminder about the difference of
- 9 these effectiveness types of trials versus efficacy is
- 10 they're not trying to demonstrate the effect of the
- 11 intervention under its best conditions. It's actually
- 12 trying to show what happens under typical conditions,
- 13 meaning the less selection of a population the better,
- 14 so everybody that comes into a unit, everybody that
- 15 comes into the emergency department, everybody that
- 16 comes into a nursing home.
- 17 And for that reason it can sometimes
- 18 lend itself towards an efficient type of recruitment.
- 19 You can recruit a number of sites that want to
- 20 participate and it also can use a lot of things that
- 21 are already in place. So operational infrastructure,
- 22 it can use staff that are already in place to produce

1 quality improvement campaigns.

2 It can use compliance tables or reports

- 3 that are already in place. And often it is trying to
- 4 adopt learning while doing, so the learning health
- 5 system rather than a compensated type of trial or a
- 6 trial where you develop a whole infrastructure with
- 7 staffing just to conduct the trial. Next slide.
- 8 Targets for these types of populations
- 9 can include, as I mentioned, these types of grouped
- 10 locations but of course it can also include special
- 11 populations. So this includes people who undergo
- 12 surgical procedures, have specific medical devices,
- 13 including those that have very specific chronic
- 14 illnesses like people who are going to a dialysis
- 15 center.
- 16 This also applies to those who have
- 17 multidrug-resistant organisms, so those that are
- 18 tagged as carriers and of course those that can be
- 19 followed post discharge for any number of reasons.
- 20 Next slide.
- 21 Often when you think about universal
- 22 versus targeted populations, there are real pragmatic

1 individuals. You can recruit and randomize ICUs in a

- 2 cluster randomized way. Those ICUs can just receive
- 3 standard order sets or standard protocols that adopt a
- 4 new practice. And usually the unit based surveillance
- 5 are things that are normally being collected so
- 6 hospital onset, multidrug-resistant organisms,
- 7 bloodstream infections.
- 8 And on the other hand, you could design
- 9 a trial that would decolonize MDRO carriers. That is,
- 10 you would find them with some sort of flag that's in
- 11 the electronic health record. You then recruit them.
- 12 You consent them. You randomize them. And then you
- 13 follow them up on whether they're in the hospital or
- 14 out for any sort of clearance or infection outcomes.
- 15 Next slide.

1 moment.

- 16 So depending on the question under
- 17 study you can design your trial to be very, very
- 18 temporary. That is, you find these high-risk periods.
- 19 Some of these were mentioned in prior talks, and you
- 20 can find these high-risk moments like being in an ICU
- 21 or being in a nursing home, in a dialysis center, and
- 22 you can focus all of your intervention right at that

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- 1 considerations on how to actually roll out the
- 2 intervention. When you do something in a group, a
- 3 whole unit, a whole clinic, often it's easier to train
- 4 and implement. These are changes in protocols and
- 5 practices that are constantly occurring and usually
- 6 institutions have a way in which we roll out new
- 7 protocols and new adopted guidelines.
- 8 Often these types of outcomes again are
- 9 already tracked because many of them are under
- 10 national reporting. Targeted populations, on the
- 11 other hand, require either a flag in the medical chart
- 12 or some sort of detection algorithm to find them. We
- 14 to reach them to find out whether or not they've
- 15 actually had a good outcome, so detailed chart review, 15 clinics, sometimes have special home visits, and then
- 16 and many times if we're looking at longitudinal
- 17 effects, then we require special sampling. Next
- 18 slide.
- 19 This is just an example of two
- 20 different ways in which you can study decolonization. 20 trials for reducing HAIs, it's really important to
- 21 You can have a population target that's at a unit
- 22 level. So this is a population of critically ill

- 2 So when they leave those areas, the
- 3 follow-up stops. And in those settings, because these
- 4 areas generally have a high amount of staffing and a
- 5 high ability to track, usual surveillance outcomes may
- 6 suffice and may in fact be the actual outcome that is
- 7 of high interest for changing during a quality
- 8 improvement endeavor.
- On the other hand, you might be looking
- 10 for something that is long standing. That is, you
- 11 want to find something that is going to benefit this
- 12 individual for a very, very long period of time, not
- 13 then require some sort of way to track them to be able 13 just during this temporary high-risk period and then
  - 14 you need to follow them up post discharge in other

  - 16 of course either sample them, and this could include
  - 17 swabbing or blood draws or any other thing that would

  - 18 be required to demonstrate a benefit. Next slide.
  - 19 Often when you're doing these types of

  - 21 have health system partners. This can be important 22 for recruitment. A lot of times health systems have

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- 1 multiple sites that can be leveraged to actually have
- 2 efficient recruitment and often it's actually better
- 3 if the system leaders reach out and there's a rapport
- 4 that actually encourages participation in a trial.
- 5 It also means that health systems often
- 6 are asked to make special IT solutions. So they're
- 7 asked to either build reports to find certain people
- 8 who might have certain characteristics or certain
- 9 clinics with certain characteristics. They may be
- 10 asked to actually implement certain order sets or
- 11 adherence tracking reports and do feedback. And then
- 12 of course, system leadership may be very much asked to
- 13 avoid competing interventions at the time for the
- 14 duration of the trial. Next slide.
- 15 These trials, as I mentioned, often do
- 16 meet the rules for minimal risk and by both OHRP
- 17 guidance as well as FDA guidance, and one of the
- 18 questions that's going to be important when we think
- 19 about waiver of informed consent is who normally
- 20 consents in the first place.
- 21 For example if we're talking about a
- 22 soap that a hospital uses or even something as

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- 1 significant as what drugs on the formulary, what
- 2 devices are implanted, what devices are used for
- 3 intubation, many times these types of things, central
- 4 lines, are not actually under the choice of the
- 5 patient.
- The facility, the clinic, the hospital
- 7 actually chooses what they purchase. They have a
- 8 certain supply and those supplies are then used for
- 9 implantation as needed during the course of medical
- 10 care. Next slide.
- 11 Controls are really, really important.
- 12 It's going to be a big complexity as you think about
- 13 these types of trials that are not typical of the
- 14 individual randomized trial. If you're looking at
- 15 these types of group type of studies, that is looking
- 16 at let's say 30 hospitals, that's a pretty big sizable
- 17 trial for a group randomized trial, and yet you only
- 18 randomize 30 different individual sites.
- 19 So it's going to be important that you
- 20 have really important controls. You can imagine that 20 look at the style of randomization scheme that
- 21 every hospital, every clinic is slightly different.
- 22 And so it may be particularly wise to have a baseline, 22 will always have balance.

1 a baseline before they enter into the intervention

- 2 period and that particular baseline for every hospital
- 3 allows it to account for unmeasured confounding; that
- 4 is, a hospital compared to itself probably has a
- 5 fairly stable population that they tend to see.
- They have a fairly stable set of
- 7 providers. Those providers interact and prescribe a
- 8 certain way. They influence one another. So having
- 9 both a baseline period and then an intervention period
- 10 can be really, really helpful.
- 11 It's also important to have
- 12 contemporaneous controls. So a lot of times you want
- 13 controls at the same time as the intervention is
- 14 happening so that you can account for secular trends,
- 15 new changes in guidance, and so oftentimes you may
- 16 want to employ what's called a difference-in-
- 17 differences approach. That means you have two groups.
- 18 One is the control group. One is the intervention
- 19 group. Each of them compares its intervention period
- 20 performance to its own baseline performance. And
- 21 those differences are compared across the two groups.
- 22 Next slide.

- 1 That is one way of course to address
- 2 confounders, and another way is to make sure that we
- 3 randomize well. This can be particularly challenging
- 4 when you're randomizing 30 hospitals instead of 30,000
- 5 people. When you are faced with having to randomize
- 6 that, it's really important that you use the methods
- 7 that are most unlikely to achieve balance in key
- 8 variables.
- 9 There are specialized approaches to do
- 10 this. We and others have published on this. We've --
- 11 the one I highlight here is called the Goldilocks
- 12 approach and you basically take a whole bunch of
- 13 baseline characteristics or outcomes that are present
- 14 in your particular population, your hospitals, your
- 15 units, whatever you're going to use, your clinics, and
- 16 then you use those baseline values and you assign
- 17 specific weights to them based upon your clinical
- 18 judgment and then you run a whole bunch of simulations
- 19 of different ways in which you can randomize and you
- 21 actually gives you the most likely chance that you

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1 And so if you use that a lot of times

- 2 you can push the button once and you can pick a schema
- 3 that actually maximizes your chance of having a
- 4 balanced draw. This is also important when you look
- 5 at analysis. Of course it's going to be important to
- 6 look at confounders, so in addition to the as-
- 7 randomized analysis, often as-treated or adjusted
- 8 analyses are going to be important. Next slide.
- 9 This is a particularly important
- 10 consideration for things that occur in acute
- 11 healthcare, but also in long-term care and these would
- 12 be competing interventions. We all know that
- 13 hospitals, clinics are incredibly driven to always
- 14 improve, and because of that, there are a myriad of
- 15 quality improvement activities that are being
- 16 launched, being maintained, and being dismantled at
- 17 almost any given time.
- Because of that, if you have only 30
- 19 hospitals, for example, that are joining into a trial,
- 20 many of them have entirely different baseline
- 21 activities that are ongoing and the best way to handle
- 22 this of course is large scale randomization, which I

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- 1 just said it's really difficult. Thirty hospitals is
- 2 already a huge trial. And the other way is to
- 3 addresses through a difference-in-differences
- 4 approach.
- 5 Another way though that's really
- 6 important is to really consider what happens during
- 7 the trial. And so many of the times it's going to be
- 8 critical for people who are pursuing HAI trials that
- 9 they actually have to monitor to make sure that new
- 10 interventions aren't being unleashed every other week
- 11 during the course of the trial.
- 12 A good example of this is the REDUCE
- 13 MRSA trial that we did. This is an ICU trial for
- 14 decolonization. And during the course of 18 months of
- 15 that particular trial, there were 69 hospital
- 16 interventions that were proposed during that time and
- 17 36 of them directly conflicted with the trial and
- 18 could not be pursued. So a lot of effort for
- 19 monitoring, dissuading, and managing dropout is really
- 20 important. Next slide.
- Of course, sample size is very, very
- 22 important. Not only is it important because it always

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- 1 is important, but because of the issue related to
- 2 competing interventions, these types of trials really
- 3 favor larger, shorter trials. Most clinics and
- 4 hospitals and ICUs, emergency departments don't like
- 5 to be locked out from being able to do other things
- 6 that could improve care.
- 7 So, this idea of constant quality
- 8 improvement is a really big activity that pervades
- 9 through healthcare today. Same thing, often because
- 10 we're dealing with things that may be minimal risk, so
- 11 minimal trials often don't need a robust safety
- 12 assessment. They don't need an interim analysis and
- 13 that interim analysis would actually in fact prolong
- 14 trial time. Next slide.
- 15 Analysis. This is a really key area
- 16 that's going to be discussed better in the next talks.
- 17 I'm only going to say a few basic things, is that when
- 18 you have outcomes that are contagious or non-
- 19 independent you really do need to involve a
- 20 statistician who is well trained with expertise in
- 21 this particular area of clustering. And this ability
- 22 to handle clustering is not only important to

- 1 determine the final outcome of the trial, but it's
- 2 really important when you're estimating sample size
- 3 and (indiscernible). Next slide.
- 4 So I'm going to give you two examples,
- 5 a similar example to the one that I said before.
- 6 These are two different trials. One, the CLEAR trial,
- 7 was individual randomized controlled trial of 2000
- 8 MRSA carriers who were being discharged. They were
- 9 discharged to either receive education and routine
- 10 care or they were discharged to receive education and
- 11 decolonization and that decolonization was repeated
- 12 for six months and then they were followed for a whole
- 13 year. So this was to prevent post discharge outcomes
- 14 of infection and their associated hospitalizations.
- 15 On the flip side is the REDUCE MRSA
- 16 trial. This is a cluster randomized trial of 43
- 17 hospitals and their ICU patients, so that amounted to
- 18 about 75,000 patients, and this was compared in three
- 19 groups: routine care, targeted, and universal
- 20 decolonization in the ICU only. And those outcomes
- 21 that were evaluated are things that are typically
- 22 available through the electronic health record and

1 normally being tracked, and that would be hospital

2 onset MRSA culture and bloodstream infections. Next

3 slide.

4 So pretty different styles for these

5 two trials. One randomizes individuals and because of

6 that it takes a long time to find them, to identify

7 them, to see who's actually willing to be in a one

8 year trial. So it had a three year intensive

9 recruitment. The REDUCE MRSA trial randomized

10 hospitals in a big health system. It took an eight-

11 week period to recruit them because the system's

12 leaders were reaching out pretty strongly and

13 encouraging people that they knew to actually

14 participate in the trial.

15 One required individual consent and

16 compensation. The other one waiver of informed

17 consent and no compensation being conducted usually

18 through the -- through the usual courses and through

19 the usual staffing related to hospital care. One

20 required extensive chart review so that after the

21 trial was finished there was still a two-year period

22 where charts were being garnered, redacted, evaluated

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1 change on something that was shown to be very

2 effective against an old control. So knowing what the

3 controls are and having really specific guidelines for

4 them can be really important.

5 A second thing that's highly relevant

6 for infection prevention is sometimes you have three

7 different trials and they all are targeting the same

8 exact outcome. They use the same exact set of

9 controls and they all find, let's say, a 20 percent

10 reduction in the outcome of interest. And so one of

11 the other key questions is then, do all of them need

12 to be performed or in fact, are they additive, are

13 they synergistic, or are they replaceable?

14 And so there's a lot of questions when

15 we're talking about limited resources and also limited

16 time to train on whether or not these things really

17 are all -- all should be endorsed by upcoming

18 guidelines. Next slide.

19 Another key thing related to this

20 entire workshop of course is how do we think about FDA

21 indications. Many times, these types of minimal risk

22 trials, these types of population pragmatic trials are

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1 by more than one person, and then adjudicated to get

2 the final answer.

3 The other one used data from the

4 electronic data warehouse. That shortened the course

5 of analytic time even though the numbers were much

6 greater. And overall, the price per patient can be

7 much, much lower when you're looking at something

8 that's happening during the usual domain of care.

9 Next slide.

So a couple more comments about a few

11 things after the trial is done. There's just a few

12 more concerns or considerations that are important,

13 and one is how do you compare trials over time. And

14 this is particularly important for infection

15 prevention guidance. It may be important for

16 indications, but as we all know, gold standards

17 control stay in place for a while, but then they

18 eventually change.

Whatever is considered gold standard

20 today is unlikely to be the gold standard 10, 15,

21 certainly 20 years from now. And so it raises the

22 question about whether or not we're looking at a

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1 actually not being done by the companies that would or

2 would not seek an indication. They're usually done by

3 healthcare systems or infection prevention programs

4 that see a need and therefore pursue this trial.

5 For that reason, these pragmatic trials

6 are not structured to achieve FDA indications and in

7 fact it's not common that a indication would actually

8 -- a company would seek to get an indication using

9 somebody else's trial. So it is possible

10 theoretically, but it's not commonly done.

11 One thing that's thought provoking is

12 you can imagine that sometimes we say, well it's okay,

13 it's already out on the market. These are usually

14 post-marketing trials, looking for additional usages

15 that are under the domain of medical care but lack of

16 an indication can actually hamper adoption. And why

17 do I say that? Because let's say we just heard that

18 there might be 50, 60 percent of hospitals that are

19 using chlorhexidine bathing, but actually there is no

20 manufacturer indication to do that.

21 So let's say another 20 percent of

22 hospitals see the new guidelines and say, we better

- 1 start to implement this indication which is now -- or
- 2 this intervention which is now the new gold standard
- 3 for the field, and now I can't find a manufacturer who
- 4 will train me because this is not an indicated use.
- 5 Another thing that could actually
- 6 happen is that a future trial now looks to have a
- 7 control group and the control arm is going to use a
- 8 product that does not carry an FDA indication for it.
- 9 So there's a number of things that are going to be
- 10 important when we think about what is the current gold
- 11 standard, what is actually promulgated in the
- 12 guidelines, and then what is actually going to be a
- 13 reasonable way in which you can make comparisons or
- 14 actually achieve an FDA indication. Next slide.
- So in summary, there are a wide range
- 16 of trial designs, trial durations that can be pursued
- 17 for achieving HAI reduction and evaluating them in the
- 18 course of a trial. A couple of key issues to consider
- 19 is whether or not it would be advantageous to use a
- 20 group level randomization versus an individual
- 21 randomization, making sure of course, as always that
- 22 you have sufficient sample size, but this is even more

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- 1 cluster randomized trials or CRTs, using a minimum of
- 2 mathematical detail. And let me doff my cap to the
- 3 two good CRT texts listed at the bottom of the slide,
- 4 both of which provided much of the content in the
- 5 succeeding slides. Next slide, please.
- 6 So this is a simple, somewhat idealized
- 7 CRT sampling and randomization scheme. So we have a
- 8 large population of clusters typically of different
- 9 sizes. That is, different numbers of individuals
- 10 belong to them. So for example, in the context of
- 11 education research, schools might be clusters. In
- 12 our present context hospitals or ICUs might be
- 13 clusters. And there's an associated population of
- 14 individuals which includes all individuals who belong
- 15 to a cluster.
- 16 To implement the trial, we select a
- 17 random sample of N clusters from the population of
- 18 clusters and then each of the selected clusters is
- 19 randomly assigned to treatment one or treatment zero,
- 20 and then the assigned treatment is administered
- 21 throughout the cluster. Then for each of the
- 22 individuals from a selected cluster, we observe their

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- 1 important if you do group randomization to make sure
- 2 that you have robust ways of balancing confounders in
- 3 addressing a proper control.
- 4 You do want to make sure that you count
- 5 for contagious outcomes in your analysis and in the
- 6 planning and it's absolutely critical to make sure
- 7 that during the course of these trials that we
- 8 actually disclose and assess and record competing
- 9 interventions and what happens to them as well as
- 10 ensure data that if a whole group drops out, how do we
- 11 make sure that we retain the data ongoing so that you
- 12 can complete an as-randomized analysis. Thanks very
- 13 much.
- 14 DR. DAN RUBIN: Thank you very much,
- 15 Dr. Huang. That was very informative. Our next
- 16 speaker is Ed Bein. Dr. Bein is a senior statistician
- 17 at the FDA where he has worked for five years. He has
- 18 a doctorate in biostatistics from UC Berkeley. Over.
- 19 DR. ED BEIN: Okay, thank you. Okay,
- 20 next slide, please.
- 21 So this presentation is devoted to a
- 22 review of key statistical and design concepts for

- 1 endpoint values. And as a running example, let me use
- 2 the binary endpoint of whether a nosocomial infection
- 3 was acquired, yes or no. Next slide, please.
- 4 Okay. Now let's consider the N1
- 5 clusters that were randomly assigned to treatment one.
- 6 Typically these clusters -- so let me know if there
- 7 are a couple of typos in the slide where it states
- 8 clinical success rates, that should read infection
- 9 rates. So of the N1 clusters randomly assigned to
- 10 treatment one, typically these clusters have variable
- 11 infection rates, and I'll let pi(1)(i) denote the
- 12 infection rate for the I-th cluster among the clusters
- 13 that were assigned to treatment one.
- 14 This variability in cluster level
- 15 infection rates is due to differences in cluster level
- 16 characteristics, so in our context, important
- 17 differences could include differences in funding
- 18 levels, degree of understaffing, amount of staff
- 19 turnover, quality of leadership, and patient
- 20 characteristics. And these and other important
- 21 characteristics can account for differences in
- 22 cluster-specific infection rates, even among clusters

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1 that administered the same treatment.

2 Going further, we can conceptualize

- 3 these cluster-specific infection rates as belonging to
- 4 a population of such infection rates. That is for
- 5 each cluster in the population, whether or not it
- 6 participates in our trial, we can consider the
- 7 infection rate it would have if it were to administer
- 8 treatment one and then ditto with regard to treatment
- 9 zero. Next slide.
- 10 Okay, now I'm going to talk about the
- 11 intracluster correlation sometimes referred to as the
- 12 intraclass correlation. So if there's positive
- 13 treatment one between cluster variants, then that
- 14 implies that the endpoint values from pairs of
- 15 individuals belonging to the same treatment one
- 16 cluster are positively correlated. This correlation
- 17 is termed the intracluster correlation denoted either
- 18 ICC or using the Greek letter rho.
- 19 On the other hand, endpoint values from
- 20 pairs of individuals from different treatment one
- 21 clusters are independent and are not correlated. So
- 22 the correlation only applies to individuals from the

- 1 is the same, to estimate the risk difference, the
- 2 treatment one versus treatment zero risk difference.

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- 3 And we're going to get -- let RD(hat)
- 4 be the usual estimator of the risk difference; that
- 5 is, we compute among all of the subjects assigned to
- 6 treatment one. We compute the infection rate. Then
- 7 we focus on all the subjects assigned to treatment
- 8 zero. We compute the infection rate. And the
- 9 difference between those two infection rates is our
- 10 estimate of the true risk difference.
- 11 So in case one we're using an
- 12 individual randomized trial with 100 subjects per arm.
- 13 In case two, we're going to employ a CRT with 50
- 14 clusters per arm and two subjects per cluster, so
- 15 again 100 subjects per arm. And let's suppose that
- 16 the intracluster correlations for both arms is equal
- 17 to .02.
- 18 Then this trial has the same
- 19 statistical power to test the null hypothesis that the
- 20 risk difference equals zero. That would be obtained
- 21 from an individual randomized trial with 98 subjects
- 22 per arm. That is even though the nominal number of

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- 1 same cluster and then ditto for treatment zero and its
- 2 intracluster correlation. Next slide, please.
- 3 So now, let me talk about some of the
- 4 downsides of employing CRTs. So let me start by
- 5 noting that standard statistical methods such as t-
- 6 test or chi square tests assume independent
- 7 observations. However, when the intracluster
- 8 correlations rho 1 and rho 0 are positive, this
- 9 assumption is violated because some observations are
- 10 in fact correlated.
- 11 This implies that applying standard
- 12 methods to CRT individual level data will yield overly12
- 13 optimistic p values and overly narrow confidence
- 14 intervals. Further, the effective sample size when
- 15 valid nonstandard analysis methods are used is smaller15 randomized trial, and smallest in case three, the CRT
- 16 than the nominal sample size. And the next slide
- 17 exemplifies what I mean by effective sample size.
- 18 Next slide, please.
- 19 Okay so now we're going to consider
- 20 three different trials, all employing 100 subjects per
- 21 arm, and you can imagine they're being run in three
- 22 parallel universes. And the statistical aim of each

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- 1 subjects per arm in this trial is 100, we say that the
- 2 effective sample size is 98 subjects per arm. And in
- 3 the third case again it's the CRT but now employing 10
- 4 clusters per arm with 10 subjects per cluster. And
- 5 we're assuming the same intracluster correlations.
- 6 Then for this trial it would have the
- 7 same statistical power to test the null hypothesis
- 8 that would be obtained from an individual randomized
- 9 trial with 85 subjects per arm. That is, the
- 10 effective sample size for case three is 85 subjects
- 11 per arm.

And so the bottom line is that the

- 13 statistical power for testing the null hypothesis is
- 14 greatest in case one, that is the individual
- 16 that had the fewest clusters. And so taking a step
- 17 back, CRTs suffer in statistical power relative to
- 18 individual randomized trials with the same number of
- 19 subjects.
- 20 To what extent they suffer will depend
- 21 on the number of subjects per cluster and on the
- 22 magnitude of the intracluster correlation. Next

1 slide, please.

2 Okay, but now let's talk about why we

- 3 might want to employ a CRT design, and the most
- 4 compelling reason is that it's the only appropriate
- 5 trial design when we're seeking to evaluate treatments
- 6 that are intended to be administered cluster-wide. So
- 7 this is really an issue of ecological validity that to
- 8 evaluate treatments that are to be administered
- 9 cluster-wide, they should be administered cluster-wide
- 10 in the evaluation study.
- 11 And so there's a related issue that
- 12 CRTs are intended to handle within cluster
- 13 contamination or interference between treatments. And
- 14 this is related to the notion of indirect treatment
- 15 effects that was discussed earlier today. So there's
- 16 interference between treatments when patients'
- 17 clinical outcomes are influenced by both the
- 18 treatments they themselves receive and the treatments
- 19 that others in their cluster receive.
- 20 So imagine I'm living in a household
- 21 with a number of others and I'm a diabetic and there
- 22 are other diabetics in my household. Then my blood

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- 1 sugar levels will be influenced by the specific
- 2 treatment I'm taking for my diabetes, but my blood
- 3 sugar levels will not be influenced by the treatments
- 4 that may be employed by any of my diabetic housemates.
- 5 So this is an example of no interference between
- 6 treatments.
- 7 However, let's imagine that some
- 8 hideous and highly contagious pathogen rears its ugly
- 9 head and an effective vaccine has been developed for
- 10 it. Then even if I'm vaccinated, my probability of
- 11 becoming infected is lower if all of my housemates are
- 12 also vaccinated than if none of them are vaccinated,
- 13 as if all of my housemates are vaccinated, then my
- 14 level of exposure within my household to this awful
- 15 pathogen will probably be lower. So the treatments
- 16 that are used or not used by my housemates influences
- 17 my probability of becoming infected.
- 18 And so more broadly with regard to
- 19 contagious diseases, my outcome when a specific
- 20 treatment or prevention regime is administered
- 21 throughout my cluster may differ from the outcome I
- 22 would obtain if administration were not cluster-wide.

1 So if a regime is intended to be administered cluster-

- 2 wide, it should observe the outcomes resulting from
- 3 cluster-wide administration. Next slide.
- 4 Okay, now let me talk about two
- 5 different broad analysis approaches. In trials that
- 6 randomized individuals, the individuals' endpoint
- 7 values are the outcomes used in efficacy analyses but
- 8 in CRTs, the analyst has a choice between directly
- 9 using individuals' endpoint values as outcomes or
- 10 alternatively using cluster level summaries as
- 11 outcomes.
- 12 So an example of a cluster level
- 13 summary, for each cluster in the trial, compute its
- 14 infection rate and then compare the treatment one and
- 15 treatment zero clusters rates using t-test. An
- 16 example of a subject level endpoint analysis, analyze
- 17 all of the individual binary infection outcomes using
- 18 logistic regression GEE to compare treatments. This
- 19 is a version of logistic regression appropriate for
- 20 hierarchical data where individuals are clustered
- 21 within higher level units. Next slide, please.
- So you may recall that in the second

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- 1 slide, I talked about two populations of interest, the
- 2 population of clusters and the population of
- 3 individuals. And so treatment effects can be defined
- 4 separately with regard to each of these populations.
- 5 So at the cluster level, each cluster can be thought
- 6 of as having its own specific risk difference. This
- 7 is the infection rate the cluster would have if it
- 8 were to administer treatment one minus the infection
- 9 rate the cluster would have if it were instead to
- 10 administer treatment zero.
- 11 And we defined the cluster level risk
- 12 difference as the mean cluster specific risk
- 13 difference over the population of clusters.
- 14 Alternatively, imagine that all individuals in the
- 15 population of individuals receive treatment one call
- 16 the resulting infection rate, rate one. Ditto for
- 17 treatment zero and rate zero. Then we define the
- 18 individual level risk difference as the difference
- 19 between rate one and rate zero. Next slide, please.
- Okay, so buyer beware. In general, the
- 21 individual level risk difference does not equal the
- 22 cluster level risk difference. So now if we could go

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1 back to slide nine. So that's two slides back. Thank

- 2 you. In the example of -- in the t-test example of
- 3 cluster level infection rates, the null hypothesis is
- 4 that the cluster level risk difference equals zero.
- 5 However in the logistic regression GEE example, the
- 6 null hypothesis being tested is that the individual
- 7 level risk difference equals zero. So in general,
- 8 these two null hypotheses differ. Okay, now if we can 8 clusters and by the bad luck of the draw all clusters
- 9 go forward to Slide 11.
- 10 So the bottom line is that the method
- 11 of analysis should target the treatment effect at the
- 12 level of clinical interest. In practice, this will
- 13 typically be the individual level risk difference but
- 14 this is really a substantive issue and not a
- 15 statistical issue. Next slide, please.
- 16 Okay, now let me briefly talk about
- 17 different kinds of CRT designs. So the design -- the
- 18 simple design that I presented in my second slide was
- 19 a completely randomized parallel group design. And 19 balance as was discussed in a previous talk.
- 20 parallel group design means that each cluster
- 21 administers a single treatment over the course of the
- 22 trial. But there are two other kinds of parallel

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- 1 group designs of note, one is the matched pair design
- 2 and here, clusters are paired based on similarity on
- 3 baseline characteristics predictive of outcome. And
- 4 then one member of each pair is randomized to
- 5 treatment one and the other pair goes to treatment
- 6 zero.
- 7 And another type of parallel group
- 8 design is a stratified design where clusters are
- 9 grouped into strata defined in terms of baseline
- 10 characteristics predictive of outcome, and there are
- 11 at least two clusters in each stratum that are
- 12 randomized to each arm.
- 13 Let me note that there are also designs
- 14 that are not parallel group designs and examples would
- 15 be crossover designs and step wedge design. And with
- 16 these designs, each cluster administers both
- 17 treatments over the course of the trial but these
- 18 treatments are administered at different non-
- 19 overlapping periods of time. Next slide, please.
- 20 So let me very briefly consider some
- 21 considerations for choosing the type of CRT design to
- 22 employ, and this is a complex topic so I'm just, you

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- 1 know, dealing with this very briefly. So a major
- 2 concern is the issue of between-arm imbalance on
- 3 important cluster-level baseline characteristics. And
- 4 so this kind of between-arm balance matters for face
- 5 validity and for statistical power.
- 6 So regarding face validity, imagine
- 7 that we're running a CRT with a small number of
- 9 from rural areas end up in one arm and all clusters
- 10 from urban areas end up in the other arm. Then
- 11 whatever the CRT results, readers of these results are
- 12 likely to be skeptical of generalizing the results to
- 13 general concerns about how the rival treatments work.
- 14 Now the concern about between-arm
- 15 imbalance will be minimal if there are a very large
- 16 number of clusters included in the trial, but that
- 17 will be more the exception than the rule, and
- 18 otherwise pair matching or stratification can improve
- 20 The Hayes & Moulton textbook generally
- 21 recommends using stratification over pair matching,
- 22 but this is an area of active research and so there's

- 1 no final word here. And let me also note that
- 2 covariate-adjusted statistical analyses can be used to
- 3 adjust for some degree of between-arm imbalance and
- 4 thereby increase statistical power. But particularly
- 5 when the endpoint is binary endpoint, such analyses
- 6 require a particular amount of care.
- 7 So that's it for the talk. Thanks very
- 8 much.
- DR. DAN RUBIN: Great. Thank you so
- 10 much, Dr. Bein. Our next talk is Controlling
- 11 Pathogens in Healthcare: A Way Forward presented by
- 12 Dr. Robert Weinstein. Dr. Weinstein is C. Anderson
- 13 Hedberg, MD Professor of Medicine at the Rush Medical
- 14 College and chairman emeritus, Department of Medicine,
- 15 Cook County Hospital, Chicago. Dr. Weinstein has been
- 16 president of the Society for Healthcare Epidemiology 17 of America. He's been chair of CDC's Healthcare
- 18 Infection Control Practices Advisory Committee, an
- 19 Infectious Disease Society of America board member and
- 20 voting member of the President's Advisory Council on
- 21 Combating Antibiotic-Resistant Bacteria. Dr.
- 22 Weinstein.

- 1 DR. ROBERT WEINSTEIN: Thank you. I'm
- 2 going to be talking today about controlling pathogens
- 3 in healthcare, what I see is a way forward, and
- 4 disclosures are this is my personal -- these are my
- 5 personal views. Next slide.
- 6 I have what I consider to be three key
- 7 topics. The first is I'll start with a model of the
- 8 causal pathway of spread of multidrug-resistant
- 9 organisms with a focus on potential decolonization
- 10 interventions. Second, I'll discuss the potential
- 11 need to deconstruct infection prevention ensembles.
- 12 And third, I will stress the need to understand the
- 13 fecal patina, which can be defined as the coating of
- 14 multidrug-resistant organisms, often on the skin of
- 15 patients who are in acute and long-term care and the
- 16 related microbiome interactions. Next slide.
- 17 The first topic is the causal pathway
- 18 which is somewhat similar to the slides that John
- 19 Jernigan showed earlier this morning, and starting in
- 20 the upper left, the patient comes into a hospital with
- 21 normal flora or if they're readmitted or a nursing
- 22 home old patient, they may have pre-existing
  - Page 251
- 1 antibiotic resistance, and then some reasonable
- 2 percentage of them -- I've guesstimated 10 to 40
- 3 percent -- after exposure to antibiotics or due to
- 4 colonization pressure which is the patients around
- 5 them who have antibiotic-resistant organisms and maybe
- 6 other situational factors, will become colonized with
- 7 drug-resistant bacteria or fungi.
- 8 Virtually 100 percent of these patients
- 9 will have this fecal patina, that is skin colonization
- 10 of these organisms, in addition to GI and respiratory
- 11 carriage. And then some percentage of these patients
- 12 will shed these organisms within the environment.
- 13 They will contaminate healthcare worker hands. The
- 14 hands will move from patient to patient and lead to
- 15 patient cross colonization with multidrug-resistant
- 16 bugs and then some variable percent of patients
- 17 depending on their procedures, underlying risk
- 18 factors, exposures, and so forth will develop clinical
- 19 infections with the bacteria or fungi that are
- 20 colonizing them.
- Now historically -- next slide -- we
- 22 started our interventions at the bottom of this list

- Page 252
- 1 so we started with the device guidelines and reporting 2 rates and cluster detection as some of our earliest
- 3 interventions. Device guidelines you've heard about
- 4 already today related to IV catheters, bladder
- 5 catheters, endotracheal tubes, and so forth. And
- 6 these are good sites for decolonization,
- 7 decontamination interventions.
- 8 Reporting rates is useful for people to
- 9 know what's going on -- it turns out if you know that
- 10 you're worse than your neighbors, you try to do better
- 11 -- and then cluster detection to try to reduce the
- 12 risk of further spread of bacteria that are already
- 13 causing many clusters. Next slide.
- 14 As you move up the pathway, hand
- 15 hygiene is applied. Some patients are screened in
- 16 some interventions. Isolation precautions are
- 17 applied. And again cluster detection. Hand hygiene
- 18 is a good site and patient screening are good sites
- 19 obviously for decolonization interventions. Next
- 20 slide.
- 21 Dealing with healthcare worker hand
- 22 contamination. The obvious intervention is hand
  - Page 253
- 1 hygiene, and there's also potential for universal
- 2 gloving which personally I think is one of the most
- 3 effective interventions in this, in the interventions
- 4 I'm going to show in this pathway. Next slide.
- 5 For the environment, and you've heard
- 6 that the environment is particularly problematic for
- 7 some bacteria like vancomycin-resistant enterococci
- 8 for C. aureus, for C. difficile, also for some
- 9 acinetobacter strains, for some fungi. It's a problem
- 10 beyond C. aureus and improved environmental cleaning
- 11 is obviously an intervention. Next slide. Next
- 12 slide.
- 13 I think that the most striking
- 14 intervention in this whole pathway in my view, and
- 15 you've already heard about this is chlorhexidine
- 16 bathing. There have been key demonstrations of the
- 17 efficacy of decolonization of the skin, sometimes with
- 18 even greater than expected benefits in terms of
- 19 preventing bacteremias, for example in ICU patients.
- 20 Next slide.
- 21 And then finally the most recent
- 22 interventions have gone -- have gotten to the very

2 stewardship, microbiome restoration which you've heard

3 about today, and other potentially situational

1 root of the problem which includes antibiotic

4 interventions.

5 This leads me to topic two with all of

6 these -- next slide -- with all of these guidelines

7 and all of the yellow interventions that are on that -

8 - that I put on the pathway which are largely

9 ensembles, what does the heavy lifting? Who is

10 important? And here I show a picture of Seinfeld.

11 You know, is Jerry most important? George? Elaine?

12 Kramer? Or I could have shown a picture of Big Bang

13 Theory which actually I like better. Who does the

14 heavy lifting? Next slide.

So I want to give you an example from a

16 guideline. This is from 2002, so two decades ago.

17 This is the first CDC/HICPAC IV Catheter Infection

18 Prevention bundle and you could take all of the

19 recommendations in this guideline and distill them, I

20 think, down, boil them down to the first five

21 interventions: education of personnel about taking

22 care of catheters, checking daily.

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Is the catheter needed? Remove it if

2 it isn't. Avoiding routine catheter replacement is an

3 infection control strategy. Using chlorhexidine skin

4 prep. And then subsequently after this guideline was

5 published, it was shown that bathing patients daily in

6 ICU with chlorhexidine is a major benefit for

7 preventing CLABSIs and then maximum barrier

8 precautions for those inserting lines. That is, they

9 should be wearing masks, gowns, gloves, and so forth.

Now there are only five really key

11 interventions in this bundle, and each of them has

12 been shown in a randomized trial to be effective, but

13 we don't know which of these is most important. Does

14 it matter? You might say, so what. There are only

15 five of them. Do them all. And that's a reasonable

16 response. I mean you probably wouldn't want to kick

17 Jerry or George or Elaine or Kramer out of that

18 ensemble. So that's reasonable. So what.

19 But -- next slide -- if you fast

20 forward 20 decades, you can see there is the hackneyed

21 slippery slope and so "essential" -- in air quotes --

22 now is a very long list. And this is the most recent

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1 iteration of guidelines for preventing CLABSIs and

2 what's considered essential.

3 And so you could ask again really, are

4 these all really essential? Which are the most

5 essential? And I think this is an important issue as

6 you start to add decolonization to the bundles or to

7 the ensembles and as already pointed out this morning,

8 it's important to understand what the role of

9 decolonization is in light of all the other

10 interventions.

Now, how would you figure that out

12 here? It's difficult. I suppose you could use a

13 network meta analyses or you could do some trials and

14 I can't really tell you how you figure it out exactly,

15 but I can tell you it's an important issue and it will

16 become increasingly important as decolonization

17 strategies are added to ensembles or bundles. I want

18 to give you one other example of an ensemble. Next

19 slide.

20 And this is, you'll see on the next

21 slide the recommendations that are being developed and

22 this is a draft so I superimposed the lists on top of

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1 each other so they're not as easily read, because it

2 is in progress but you can see for hand hygiene there

3 are a lot of "essential" -- in air quotes again --

4 recommendations. Here though, I think we can be more

5 focused. Next slide.

6 And I think that the guideline as

7 written is an excellent advice for infection control

8 of personnel for hospitals, for nursing departments

9 that are facing a variety of administrative issues.

10 And so we recommended -- I don't know if this is going

11 to be accepted -- but recommended that this hygiene

12 follow the keep it simple principle and start with

13 this declaration.

14 "This is a carefully and thoroughly

15 compiled set of recommendations for use by infection

16 prevention groups that are responsible for developing

17 institutional policies." But "For the individual

18 patient provider, the single message is very simple:

19 hand before and after every patient is essential."

20 So I think some bundles or ensembles

21 can be boiled down to the simplest message, and again,

22 I think this is going to be very important as

Page 258 Page 260 1 decolonization strategies are added. 1 and epidemiologic problems. This does raise the 2 And this takes us to the third topic. 2 question of the interrelations of the different 3 The next slide. Microbiomes, understanding them at 3 microbiome compartments. 4 clinical, epidemiologic, and mechanistic levels. This For example, using kind of an older 5 is a translation of an old quote from Goethe that 5 terminology, is this klebsiella on this patient a 6 says, "What is the hardest of all? That which seems 6 resident flora that is it permanent flora now in the 7 most simple: to see what is before your eyes." And I 7 axilla and on the skin or is only transient? Well, it 8 want to give you two examples of microbiome 8 has to be removed every day which suggests that it may 9 interactions and how important it's going to be to 9 be more resident than transient. 10 understand them. Next slide. 10 The other implication I think is if you 11 This is a picture of an axillary 11 focus your intervention on the gut microbiome, what 12 culture of a patient in one of Mary Hayden's long-term12 will happen to the skin microbiome? Because if you 13 care studies, and you can see this is a patient 13 remove the resistant klebsiella from the gut but it 14 receiving daily chlorhexidine bathing and before the 14 remains on the skin because its resident flora, then 15 bathing, the patient had -- this wall to wall, 15 your gut intervention may not be very effective. Next 16 multidrug-resistant mucoid Klebsiella pneumoniae in 16 slide. 17 the axilla. Your axilla should not have Klebsiella 17 Along those lines, I wanted to show you 18 pneumoniae in it, and you can see afterwards, after 18 a study that was done by Kyle Popovich looking at MRSA 19 the bathing, it's been removed. 19 300, which as you heard earlier today is the typical 20 So this is a good example of the fecal 20 community-acquired methicillin-resistant staph aureus. 21 patina. You can find this bug elsewhere, on the neck, 21 And this is looking at genomic clusters; that is, the 22 in the groin, on the back, on the chest, all over 22 relatedness of MRSA among women who are detainees at Page 261 Page 259 1 these patients. This is just one site that's 1 the Cook County Jail and genomic clusters are defined 2 colonized, and I think it makes the point that the 2 genetically by looking at the number of variants 3 between MRSA isolates. 3 fecal patina is a very interesting, important, and 4 4 dynamic concept. Next slide. And you can see in the top line of this 5 You can see removing the fecal patina 5 table that if you have nares colonization, your chance 6 made the patient happy or at least in this picture 6 of being in a cluster, that is having your staph 7 made the agar plate happy. And chlorhexidine bathing 7 aureus similar to other detainees, was much less than 8 has an effect on resistant gram-negatives, on 8 if -- than not being in a cluster. So women who had 9 resistant gram-positives like MRSA and VRE and the 9 nasal colonization were much more likely to have 10 unique strains of MRSA not related at all to the other 10 benefits for the patient clinically are very marked 11 with decreased risk of infection with the bugs that 11 strains of other individuals. 12 are on -- the that are removed from the fecal patina, 12 And you can see bullet one, an 13 and the benefits to the hospital and the nursing home 13 interpretation was nares colonization was negatively 14 epidemiologically as John Jernigan showed this morning 14 associated with being in a genomic cluster and could

> 21 acquired strains, but they had it at sites other than 22 the nose. So their noses had no MRSA, but their

20 methicillin-resistant staph aureus, USA-300, community

Now if you look at the bottom line of

15 represent mostly endogenous colonization.

19 is, they were carrying staph aureus, MRSA,

17 that table, this looks at those detainees who have

18 what's called exclusive extranasal colonization. That

16

15 with a slide about VRE in an ICU that with

16 chlorhexidine bathing daily, there's lessened

19 patients may still have GI or respiratory tract

20 colonization with this pathogen. The only thing

21 that's been removed is the fecal patina, and yet there

22 is a major benefit in terms of both clinical outcomes

It's important to realize that these

17 likelihood of spread of MDROs.

18

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- 1 groins or backs or axilla or other side on their body,
- 2 perianal sites had MRSA. And you can see in bullet
- 3 two under the interpretation that exclusive extranasal
- 4 colonization was associated with being in a genomic
- 5 cluster.
- 6 So those with only extranasal
- 7 colonization, 80 percent of them were in a cluster,
- 8 meaning their strains were similar to other patients
- 9 suggesting that this colonization pattern predisposes
- 10 to exogenous MRSA acquisition. And in the last bullet
- 11 underlined, "the findings suggest that nasal
- colonization may serve a controller role in limiting
- 13 exogenous acquisition."
- 14 So it's important I think to understand
- 15 the interrelations of various components of the
- 16 microbiome in various compartments. Next slide.
- 17 So in conclusion, a model of the causal
- 18 pathway of spread of antimicrobial-resistant
- 19 organisms, I believe, can help focus implementation of
- 20 strategies for pathogen reduction and the role of
- 21 colonization and decolonization.
- 22 Second, infection control guidelines

1 also touch on an opportunity to bring innovative

- 2 products to the market. Next slide, please.
- 3 As already noted, the American Cleaning
- 4 Institute is a trade association for the cleaning
- 5 products industry, including suppliers, formulators,
- 6 and packaging companies. ACI is also the trade
- 7 association representing the topical antiseptics
- 8 industry and is currently supporting the safety and
- 9 efficacy research for five of the six over-the-counter
- 10 antiseptic active ingredients that were deferred from
- 11 final regulation by FDA several years ago. Slide,
- 12 please.
- 13 This is brief slide to show you who are
- 14 the ACI members that are producing topical skin
- 15 antiseptic ingredients and products, and these are the
- 16 companies that are actively supporting the extensive
- 17 FDA data requirements for generally recognized as safe
- 18 and effective determination. This collaboration
- 19 really has been ongoing since 1994, when FDA
- 20 promulgated the tentative final monographs regulating
- 21 healthcare and consumer antiseptics.
- 22 The topical antiseptics have been used

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- 1 and bundles are not parsimonious as currently
- 2 formulated, and the relative importance of the
- 3 individual components should be evaluated. And I
- think this is going to take on increased importance as
- 5 new components may be added to target colonization
- And the third point is that studies the
- 7 microbiome should assess mechanisms behind the
- 8 creation of the fecal patina, how does it get there,
- 9 how does it persist, and explore the interrelations of
- 10 different components and compartments of the
- 11 microbiome. Thank you very much.
- 12 DR. DAN RUBIN: Thank you very much,
- 13 Dr. Weinstein. Our next speaker is James Kim. Dr.
- 14 Kim is the vice president of Science and Regulatory
- 15 Affairs and leads the scientific team at the American
- 16 Cleaning Institute, the trade association for
- 17 manufacturers of soaps, hand sanitizers, cleaning
- 18 products, and their chemistries. Over.
- 19 DR. JAMES KIM: Afternoon. Thank you
- 21 Institute's ongoing research to support the safety and
- 22 efficacy of over-the-counter topical antiseptics and

- 1 safely for many decades in both professional and
- 2 consumer settings, and as illustrated by Dr. Weinstein
- 3 on the previous presentation, there is a role for
- 4 effective hand hygiene practices and these antiseptic
- 5 products in preventing hospital associated infections.
- 6 Just to backtrack with a little
- 7 history, ethyl alcohol started being used in the 1880s
- 8 in Germany for presurgical hand disinfection. And in
- 9 fact, professor Philip Price from the Johns Hopkins
- 10 University published a paper in the Archives of
- 11 Surgery in 1939 titled "Ethyl Alcohol as a Germicide."
- 12 Alcohol-based hand sanitizers have been recommended
- 13 over soap and water by the CDC in their healthcare
- 14 hand hygiene guidelines since 2002, and also by the
- 15 World Health Organization in 2009.
- 16 And we also saw that alcohol-based hand
- 17 sanitizers were a critical tool during the COVID
- 18 pandemic, as evidenced by the FDA allowing emergency
- 19 production of hand sanitizers. OTC topical
- 20 for having me today to discuss the American Cleaning 20 antiseptics are regulated by FDA's OTC monographs and
  - 21 recently monograph reform. And while new drug
  - 22 approvals can be pursued for these products, this

Meeting August 30, 2022 Page 266 Page 268 1 regulatory pathway is long, costly, and commercially 1 active work streams to ensure that progress towards 2 risky. 2 meeting FDA's data requirements were generally 3 It is also important to note that OTC 3 recognized and safe and effective determinations 4 monographs provide the criteria for antibacterial 4 continues. Programs on topical antiseptics have been 5 efficacy claims, but these monographs do not include 5 searching for infection prevention study designs that 6 antiviral or decolonization claims and this constrains 6 are reasonable and manageable and so special thanks to 7 development and use of products for reducing 7 Dr. Theresa Michele for providing an overview of the 8 infections due to skin colonization. Slide. 8 rule makings governing these products a few talks 9 Okay, this table shows the five active 9 earlier. 10 10 ingredients on the left side that ACI is supporting For consumer antiseptics, FDA requires 11 for safety and efficacy research, and these are cross 11 a clinical outcome study that demonstrates a direct 12 reference with the consumer and healthcare indications 12 clinical benefit such as reduction in infection. This 13 promulgated by FDA in the final monographs. The 13 is in contrast to the requirements for healthcare 14 antiseptics that used surrogate endpoints such as 14 healthcare indications are patient preoperative skin 15 preparation as well as preinjection skin preparations, 15 bacteria log reductions to demonstrate effectiveness. 16 personal hand washes, personal hand rubs, surgical 16 The studies that were pursuing for the 17 hand scrubs, and surgical hand rubs. All five 17 consumer clinical efficacy study, FDA provided 18 ingredients that ACI is supporting are eligible for 18 feedback to us several years ago on using an enriched 19 the patient preoperative and preinjection skin uses. 19 population to manage confounding variables as well as

20 Slide.
20 to increase the power of the study. We are currently
21 This table summarizes FDA's assessment
22 of the safety data gaps for over-the-counter topical
23 to increase the power of the study. We are currently
24 pursuing a study design using U.S. Marine Corps
25 recruits as an enriched population with different

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2 safety is well proven and understood, but filling the
3 remaining safety gaps for all of the active
4 ingredients will be costly. Ethyl alcohol and
5 povidone iodine are the two ingredients that have
6 nearly complete safety information for a GRAS
7 determination and also have shown no resistance
8 potential.

1 antiseptic ingredients. As you can see, ethyl alcohol

10 review on resistance potential for the three other
11 active ingredients that we are working on, including
12 benzalkonium chloride, benzethonium chloride, and PCMX
13 or chloroxylenol, and this literature review was
14 submitted to FDA last year, in 2021.
15 This slide shows the current status of
16 ACI research. I'm not going to go into too much

ACI has also completed a literature

This slide shows the current status of
ACI research. I'm not going to go into too much
detail on this slide except to say that the topical
antiseptics program has been actively working on the
maximum usage trials to fill the safety data gaps and

21 studies.22 In total, we are managing over 20

20 is also working on several healthcare efficacy

1 barracks serving as control and treatment groups.

2 Skin infections are always a challenge for our

3 military, particularly in situations like basic

4 training and in situations of close quarters like on

5 ships, and these infections can result in significant

6 loss of active time.

The plan is to propose to FDA to use 8 skin colonization as one of the clinical endpoints in

9 the study and we will have to provide evidence to FDA

10 that correlates colonization with other outcomes

11 including infection rates. So I am very appreciative

12 of the earlier talks today by CBC that provided an

13 excellent overview of these issues.

14 And finally, just a brief summary of

15 some of the topics I discussed today. The current

16 regulatory structure can be a significant barrier to

17 the development of innovative topical skin

18 antiseptics. While the new drug approval process for

19 new skin antiseptics exists, it is a long, costly, and

20 challenged with uncertainty type of process.

21 Monograph reform is a potential

22 mechanism to facilitate new skin antiseptic products

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- 1 and technologies to reduce infections and pathogen
- 2 transmission, but for either regulatory pathway
- 3 establishment of skin decolonization and pathogen
- 4 reduction as a determinant of clinical outcomes would
- 5 greatly facilitate new antiseptic development.
- So we look forward to working with FDA
- 7 to clarify these requirements for new products and
- 8 continue to enable innovation to benefit public
- 9 health.
- 10 So finally, I'd like to thank you for
- 11 your time and turn it over to my colleague Nicholas
- 12 Georges who will talk about surface disinfectants in
- 13 healthcare settings.
- 14 DR. JOHN JERNIGAN: Thank you, Dr. Kim.
- 15 Let me -- this is Dr. Jernigan. Let me introduce Dr.
- 16 Georges who will talk about Development of Efficacious
- 17 Cleaning and Disinfecting Products in Healthcare
- 18 Settings. Mr. Georges is the senior vice president,
- 19 Scientific and International Affairs for the Household
- 20 and Commercial Products Association. HCPA represents
- 21 member companies that manufacture and sell products
- 22 used for cleaning, protecting, maintaining, and

- 1 comes to these products.
- 2 All right. Products used to kill
- 3 viruses and bacteria on surfaces are registered as
- 4 antimicrobial pesticides. I'll be discussing
- 5 sterilants, disinfectants, and sanitizers today and I
- 6 should note that when I say sanitizer, I'm referring
- 7 to products used on inanimate objects and not on the
- 8 human body. I will not be talking about antiseptic
- 9 rubs, which James Kim just covered.
- 10 For the most part, the products that I
- 11 will be talking about are regulated by the Environment
- 12 Protection Agency under the Federal Insecticide,
- 13 Fungicide, and Rodenticide Act, also known as FIFRA.
- 14 FIFRA is the federal law that sets up the basic U.S.
- 15 system of pesticide regulation to protect humans and
- 16 the environment. To kick things off, I'm going to
- 17 first be discussing disinfectant sanitizers.
- 18 Disinfectants are subject to more rigorous EPA testing
- 19 requirements and need to meet a higher bar for FDA
- 20 than sanitizers.
- 21 For both product types, either the
- 22 product meets the efficacy requirements or they do

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- 1 disinfecting homes, commercial, and institutional
- 2 environments. Mr. Georges.
- 3 NICHOLAS GEORGES: Thank you. My name
- 4 is Nicholas Georges and I'm the -- with the Household
- 5 and Commercial Products Association, a trade
- 6 association representing the interests of member
- 7 companies which are involved in the manufacturing,
- 8 supply, and marketing of trusted and familiar products
- 9 used for cleaning, protecting, maintaining, and
- 10 disinfecting home and commercial environments
- 11 including healthcare settings, as just was said.
- 12 HCPA is comprised of seven products
- 13 divisions including a dedicated product division for
- 14 antimicrobial products such as disinfectants and
- 15 sanitizers and a product division dedicated to
- 16 cleaning products which we'll be getting into here
- 17 shortly.
- 18 Before working for HCPA, I came from
- 19 industry where I held roles in which I was responsible
- 20 for formulating these types of products as well as
- 21 ensuring their compliance with applicable laws and
- 22 regulations, so I have hands on experience when it

- 1 not. Once they meet the efficacy requirements,
- 2 industry is not allowed to compare them against
- 3 another. For instance, for products that meet the
- 4 efficacy requirements, I cannot say an aerosol
- 5 products is a better delivery form than a trigger
- 6 spray or compare those to a wipe product. This is a
- 7 requirement under FIFRA and EPA takes it very
- 8 seriously.
- Sterilants get a bit more complicated,
- 10 as they are regulated by FDA when they're used on
- 11 medical devices. Whereas they're regulated by EPA for
- 12 all of their applications. Registrants are not
- 13 allowed to have products, you know, mix their claims,
- 14 that is both have medical device and other
- 15 applications, and as such because companies cannot
- 16 have one product that is one label for multiple
- 17 applications that cover both, it makes it easier to
- 18 distinguish who has authority over regulating the
- 19 product. This approach stems from the 1993 memorandum
- 20 of understanding between FDA and EPA.
- 21 Then cleaning products don't undergo
- 22 the same rigor that disinfectants and sanitizers do as

Meeting August 30, 2022 Page 274 Page 276 1 they do not make any biocide claims to control 1 and businesses identify effective green cleaning 2 microbial pests. Cleaning products are either 2 products utilizes both ASTM and our HCPA performance 3 regulated by the Consumer Product Safety Commission or 3 test methods and guidelines for their certification. 4 the Occupational Safety and Health Administration, 4 Next slide, please. 5 depending on where the product is being used. 5 So how should healthcare institutions If a cleaning product were to make a go about selecting the right product? There are a few 7 biocidal claim, the product would need to be 7 things to ask oneself before selecting your product. 8 registered with the EPA as a disinfectant 8 What is it that you are looking the product to do? 9 (indiscernible) sanitizer, otherwise the company may -9 Are you looking to clean a surface or disinfect and 10 - would be making a claim in violation of FIFRA. Next 10 sanitize it? If clean, what type of surface or 11 surfaces and is the chemistry of the cleaning product 11 slide, please. 12 EPA, through the Office of Prevention, 12 compatible? 13 If you're looking to disinfect or 13 Pesticides, and Toxic Substances has developed a 14 series of test guidelines for the use and the testing 14 sanitize, are you looking for a general disinfectant 15 or sanitizer or is there a specific bacteria or virus 15 of pesticides, including disinfectants, sanitizers, 16 and sterilants. Group B within Series 810 offers 16 you are concerned with? If it is the latter, ensure 17 antimicrobial efficacy test guidelines which are 17 the organism is listed on the label. And in all 18 cases, it is critical to read and understand the 18 intended to meet testing requirements under FIFRA. 19 The term product performance refers to 19 label. Next slide, please. 20 all aspects of a product's effectiveness and 20 So in closing, choosing the correct 21 usefulness conducted in light of expressed and implied 21 product for the specific task can help reduce the 22 labeling claims or recommendations concerning pests, 22 chance of infection. So with that I would like to Page 275 Page 277 1 sites, methods of application, application equipment, 1 thank you for your time today.

- 2 DR. DAN RUBIN: Thank you very much for
- 3 that presentation. Our next speaker is Erin Duffy.
- 4 Dr. Duffy is the chief of research and development at
- 5 CARB-X. CARB-X is a global biopharmaceutical
- 6 accelerator for the discovery and early development of
- 7 products to prevent, diagnose, and treat bacterial
- 8 infections. Most of her professional growth was with
- 9 Melinta Therapeutics founded as Rib-X Pharmaceuticals
- 10 where over 17 years she became executive vice
- 11 president, chief scientific officer, R&D site head.
- 12 Over.
- 13 DR. ERIN DUFFY: Thanks very much, Dan
- 14 and the organizers for the invitation to participate
- 15 in this workshop. It's been terrific so far. I hope
- 16 I don't mess that up. Next slide, please.
- 17 So for those of you who aren't familiar
- 18 with CARB-X, as you just heard, we are a
- 19 biopharmaceutical accelerator funded by three
- 20 international governments and two foundations for the
- 21 purpose of supporting the discovery and early clinical
- 22 development of products to diagnose, treat, and

- 2 dosage rates, timing and number of applications, new
- 3 situations, nature and level of pest control, duration
- 4 of pest control, compatibility with other chemicals,
- 5 benefits and or adverse effects of product use,
- 6 compatibility of common practices associated with the
- 7 sites, active ingredient status of chemicals and
- 8 formulation and equipment.
- 9 FDA as part of their guidance for
- 10 industry and FDA reviewers also has guidance as part
- 11 of the premarket notification submission of
- 12 sterilants. This guidance facilitates the assembly of
- 13 the necessary data to support the introduction of a
- 14 sterilant for medical devices into the market.
- 15 Cleaning products don't have this level of detail in
- 16 terms of guidance from federal agencies. However,
- 17 there are industry standards that help companies
- 18 determine the effectiveness of their products and
- 19 those standards can be referenced by government
- 20 programs.
- For instance, EPA's Safer Choice
- 22 program, a government program which helps consumers

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1 prevent bacterial infections.

2 You can see the numbers here. We have

- 3 about now \$800 to \$900 million to deploy in these
- 4 endeavors. Some stats in the bottom here. We've
- 5 funded just about 10 percent of all of the
- 6 applications that we've received since 2016, and I
- 7 should say these are all through active funding calls.
- 8 Today, there are 45 active projects and
- 9 we've had a lot of maturation in the program in terms
- 10 of movement into clinical stage programs and into
- 11 advanced clinical development. And this is going to
- 12 frame a lot of what I'm going to talk to you about,
- 13 especially where our non-traditional portfolio is
- 14 concerned. Next slide, please.
- So just to give you a sense of the
- 16 types of products that we invest in the non-
- 17 traditional space, I should say our heritage certainly
- 18 was direct acting small molecule therapeutics but we
- 19 recognize, like many have said today, the need for
- 20 many different ways to target antimicrobial
- 21 resistance. And so on the left, you see the
- 22 distribution of the types of modalities that we

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- 1 support, non-traditional modalities for treatment that
- 2 includes programs in anti-virulent antibody-based
- 3 programs, immune-directing programs, and bacteriophage
- 4 programs and other modalities as you can see.
- 5 On the right is a representation of our
- 6 prevention portfolio, and certainly while half of that
- 7 is vaccine directed, we do embrace other modalities as
- 8 well. The two that I'm calling out here are our live
- 9 biotherapeutic portfolio and our engineered
- 10 bacteriophage portfolio, and these are programs that
- 11 are focused on decolonization in different -- of
- 12 different pathogens in different populations.
- So I should say these programs are
- 14 maturing towards a clinical stage and one of the
- 15 things that we want to do, even though it is true we
- 16 only fund to the end of first in human, we feel it's
- 17 important to prepare these programs for success so
- 18 that there is a next best advanced development partner
- 19 and so that the work and the money that we've spent to
- 20 bring these programs forward doesn't die on the vine
- 21 but rather delivers a meaningful product for patients.
- 22 Next slide, please.

1 And so to that end, we are commencing a

- 2 series of discussions on decolonization, both to
- 3 educate ourselves and then hopefully to give some
- 4 quality advice to our product developers. And so this
- 5 is a workshop that we convened in early July. It
- 6 followed on a series of discussions that we had at
- 7 ECCMID this year in a small session with surgeons
- 8 titled, "How do I treat my transplantation patients?"
- 9 And so this is the group that we
- 10 assembled. The first, his name is Maxime Mallet. He
- 11 is a surgeon, a French surgeon who's focused on liver
- 12 transplantation. Eugene Katchman from Israel is a
- 13 transplant ID consult. Miriam Furst-Wilmes is part of
- 14 our accelerator network at (indiscernible) and so she
- 15 participated to give the view of (indiscernible) on
- 16 decolonization.
- 17 Many of you will know Mark Goldberger,
- 18 former medical director of Emerging and Pandemic
- 19 Threat Preparedness, and also director of Office of
- 20 Antimicrobial Products. And then finally, David Cook,
- 21 who is an advisor of our, formerly the chief scientist
- 22 of Seres and now with Forma Therapeutics. Next slide,

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1 please.

- 2 So we raised a number of questions or
- 3 poised a number of questions to the participants, and
- 4 I'm not going to read all of these for you, but it was
- 5 really to set the stage for the discussion. And I
- 6 want to highlight two key questions where we spent
- 7 most of the discussion, and the first is -- we've
- 8 heard a lot about this today -- what patient
- 9 populations or populations are best suited to obtain
- 10 early proof of concept, and then what endpoints in a
- 11 clinical setting do you feel are meaningful to show a
- 12 benefit for decolonization product. And relatedly,
- 13 what is the time frame where you would consider a
- 14 patient sufficiently de-risked from an infection
- 15 perspective. Next slide, please.
- So here are some key themes that
- 17 emerged from the discussion. In terms of our surgeon
- 18 and surgeon consult, decolonization was not routinely
- 19 employed in their practices, but they feel that they
- 20 need something beyond antibiotics. They're not using
- 21 antibiotic prophylaxis now because of the extreme
- 22 prevalence of colonization with ESBL, CRE, and

1 fluoroquinolone-resistant organisms, in some cases

2 greater than 80 percent.

3 And so the discussion sort of ended

4 saying, well, what if we worked back from a label that

5 might begin with, "For the reduction of colonization

6 in a closed population..." And so the closed

7 population is meant to say that there was a lot of

8 feeling that we really needed a homogeneous group or

9 as homogeneous as you can get in order to reduce the

10 signal to noise and perhaps have meaningful outcomes.

11 So in terms of proof of concept, we

12 agreed that a quantitative microbiology endpoint is

13 good but what is a sufficient measure of success? So

14 for instance, what if, you know, there's 10 to the

15 11th colony forming units at the outset and you reduce

16 that to 10 to the 8th; is that meaningful? You're

17 still leaving a lot of bacteria on the table.

18 So how do we think about this and what

19 are the bounds that we should put on that? The second

20 point of course is that for pivotal studies the

21 quantitative microbiological endpoint will not be

22 enough. There needs to be a link to clinical benefit.

1 post transplantation and indeed they are most fragile

2 in days following surgery. And it's important to note

3 that it was not felt that infection would be gained in

4 the ICU.

5 So thoughts about a study could involve

6 decolonization at some time point prior to

7 transplantation and then with early and late readouts.

8 Now of course, we would need an understanding of the

9 time course with respect to transplant for the

10 development of infection. It's likely that this would

11 be placebo controlled unless, of course, standard care

12 requires preventative antibiotic therapy where it

13 would be on top of. And then we would need an

14 understanding of how this impacts those on the

15 transplant list. Next slide, please.

16 The second population that we discussed

17 was cirrhosis patients who are hospitalized with

18 ascites and this is because they are reported to have

19 about a 10 to 30 percent likelihood of developing a

20 spontaneous bacterial peritonitis. And indeed in a

21 study in 2016 published in the World Journal of

22 Hepatology, it appears that There's a 40 percent

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1 And of course this might vary with the closed

2 population, so can we in fact translate results to

3 other populations.

4 We certainly discussed biomarker

5 strategies and felt that while they're interesting,

6 the question is what is relevant and what is the

7 signal to noise where we can harvest interesting and

8 usable information, again a big question about

9 translatability from one population to the other, and

10 then finally a need to understand the effects of

11 decolonization, how they manifest over time, and what 1 patients versus placebo?

12 external variables might influence them. Next slide,

13 please.

14 So I'm going to give you four examples

15 of populations that we felt were perhaps reasonable to 15 them. They're often less complicated and fragile.

16 consider in the conduct of clinical trials, and the

17 first was patients awaiting liver transplantation and

18 here are the reasons. They often present with

19 recurrent ascites. Greater than 30 percent are

20 carriers of CRE, ESBL, and fluoroquinolone-resistant 20 mortality.

21 organisms, and again, this varies by country and by

22 hospital. They're at risk for developing infection

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1 chance after six months and a 70 percent chance after

2 12 months of recurrence following antibiotic use.

3 And so a thought was that the study

4 could be a small pilot to understand durability of the

5 antibiotic effect, treat at some point after

6 discontinuation of the antibiotic, and then follow up.

7 Of course some patients are eligible for preventative

8 use of antibiotics. Do we add decolonization on top?

9 Do we compare decolonization to the use of

10 antibiotics? Do we consider studying lower risk

12 Third population -- next slide -- that

13 we discussed with patients awaiting induction

14 chemotherapy? The reasons is that there are many of

16 Many are neutropenic and need antibiotic therapy. And

17 so a thought here was that a study would be on top of

18 standard of care antibiotic versus antibiotic alone,

19 and likely we would need to demonstrate a benefit in

21 And then finally, a population on the

22 next slide that we discussed was something that's been

- 1 discussed here today, which is decolonization of
- 2 residents in nursing homes. Certainly as we learned
- 3 here today, high rate of multidrug-resistant organism
- 4 colonization and the worries about that with potential
- 5 transfer to the hospital for higher level care.
- Now thoughts where we could randomize 6
- 7 by facility but we had some questions. Need to have
- 8 similar demographics across those facilities. We
- 9 would need decontamination of significant reservoirs
- 10 There's the issue of testing of staff as well as all
- 11 new residents that come in. Decolonization product
- 12 would need to be broad spectrum unless you want to
- 13 start slicing and dicing within that community. And
- 14 that this is, in our estimation, best considered after
- 15 proof of concept has been shown in one of the other
- 16 populations that I just shared.
- 17 So in summary, on the final slide I
- 18 just want to emphasize that we are committed to
- 19 bringing solutions from nontraditional approaches
- 20 forward because we feel they're going to be important
- 21 in the overall approach to antimicrobial resistance.
- 22 We see both several challenges and opportunities in

- 1 innovative products to tackle antimicrobial
- 2 resistance. Ms. Sejourne.
- 3 FLORENCE SEJOURNE: Thank you very
- 4 much, FDA and CDC, to have invited me as the
- 5 representative of De Volterra as well as the BEAM A
- 6 Alliance. I'm glad to present to the virtual audience
- 7 today the status of development of a novel microbiota
- 8 protective therapy named DAV132 and highlight
- 9 challenges faced and lessons learned. Next side.
- 10 Everyone in the audience is very
- 11 familiar now after a few hours of workshop with the
- 12 well-described impact of antibiotics on the intestinal
- 13 microbiota which leads to a decreased diversity called
- 14 dysbiosis triggering a series of deleterious
- 15 consequences as human. This has actually been very
- 16 well covered earlier today by the colleagues from CDC.
- 17 Next slide.
- 18 Da Volterra has been actually
- 19 developing for the last 15 years gut microbiota
- 20 protective therapies to be co-administered with any
- 21 antibiotic in order to prevent such deleterious
- 22 consequences and maintain the function of a healthy

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- 1 decolonization strategies, but we emphasize that a
- 2 closed population is critical and the need for both
- 3 microbiological and clinical endpoints is clear.
- 4 And then finally, and I think the
- 5 purpose of a meeting like this is to emphasize that a
- 6 coordinated approach among many of the stakeholders
- 7 will be beneficial to the ecosystem. Thank you very
- 8 much.
- 9 DR. JOHN JERNIGAN: Thanks very much,
- 10 Dr. Duffy. It's great to hear that CARB-X has been
- 11 thinking about this and has been having discussions to
- 12 advance this field along.
- 13 Our next talk is entitled Challenges
- 14 and Lessons Learned Developing DAV132, a Novel Therapy14 enables the antibiotic block peaking levels to remain
- 15 Protecting the Gut Microbiota from Antibiotic-Induced
- 16 Dysbiosis. It will be given by Ms. Florence Sejourne.
- 17 Ms. Sejourne is the CEO of Da Volterra, a biotech
- 18 company that develops innovative products such as
- 19 antibiotics targeting medical needs, including
- 20 prevention of infections. She's also the founding
- 21 board member of the BEAM Alliance, which represents
- 22 European biotech companies involved in developing

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- 1 and diverse microbiota. Several benefits are expected
- 2 for such novel drug: prevention of C. difficile
- 3 infections, reduction of colonization by resistant
- 4 strains, and more recently maintenance of the immune
- 5 system enabling, for example, immune oncology drugs
- 6 like ENTPD1 to remain efficient in cancer patients who
- 7 have infections and need to be treated by antibiotics.
- 8 Next slide.
- 9 DAV132 is the most advanced product
- 10 developed by Da Volterra. It is composed of a
- 11 powerful absorbent and selected coating that capture
- 12 and inactivate antibiotics only in the colon. The
- 13 full and only delivery of the absorbent in the colon
- 15 intact while protecting the microbiota. Next slide.
- 16 So a lot of data has been generated on
- 17 DAV132 those last years, most of which being
- 18 published. I have a list of publication here at the
- 19 end of the slide set. We have first validated
- 20 DAV132's capacity to prevent CDI in a series of
- 21 preclinical experiments with multiple antibiotics
- 22 using the hamster reference model. More recently, we

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- 1 have demonstrated in a proof of concept study in mice
- 2 the capacity of DAV132 to actually maintain the ENTPD1
- 3 one efficacy which was impaired by only five days of
- 4 antibiotic exposure using fecal samples or clinical
- 5 studies, and that will be presented very shortly at
- 6 SMO in Paris.
- 7 I will comment in the next four slides
- 8 some of the clinical and microbiological data obtained
- 9 in a series of seven clinical studies where DAV132 was
- 10 shown to have an efficient and reproducible mode of
- 11 action in humans with a good safety profile enabling
- 12 us to move to Phase 3, and the CMC package of the
- 13 product was validated for Phase 3 as well. Next
- 14 slide.
- 15 So first set of data there. You can
- 16 see DAV132 can, on the left, inactivate most
- 17 antibiotics in vitro and ex vivo. Then we moved to
- 18 clinics and we've shown that DAV132 was efficiently
- 19 capturing antibiotics in the colon, both
- 20 fluoroquinolones as well as beta-lactams, whatever
- 21 oral and IV, without impacting the plasma
- 22 concentration that is here presented on the right.

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- 1 Next slide.
- 2 Such decrease of antibiotic exposure in
- 3 the colon has led to a nice protection of the
- 4 microbiome diversity, once again both demonstrated
- 5 with fluoroquinolones and beta-lactams. This was
- 6 evaluated both from diversity indexes as well as
- 7 microbiome composition heat map as you see here with
- 8 16S and shotgun technologies. Next slide.
- 9 So in order to associate such
- 10 biological demonstration of microbiome protection to
- 11 actual biological functions, we have conducted
- 12 additional analysis. The first analysis was done here
- 13 was done in ex-vivo study conducted with fecal samples
- 14 from our clinical trials showing that in patients
- 15 receiving our product DAV132 together with either
- 16 fluoroquinolones or beta-lactam, fecal samples when
- 17 exposed to C. difficile spores were protected from
- 18 proliferation. This really meant to us that DAV132
- 19 maintained the gut barrier effect and allows the
- $20\,$  resistance to colonization function by C. diff to be
- 21 protected.
- 22 In addition to this -- next slide -- we

1 looked as well at VRE counts within our clinical Phase

- 1 looked as well at VKE counts within our chinear i
- 2 2 trial and here you see that at the end of the
- 3 antibiotic treatment DAV132 group had a significantly
- 4 reduced VRE count. So overall, all we manage in those
- 5 series of clinical studies to have a solid Phase 1,
- 6 Phase 2 clinical package in order to move forward to
- 7 Phase 3 study which was designed to demonstrate the
- 8 prevention of C. difficile infections in patients at
- 9 risks. Next slide.
- 10 So we decided to select the AML patient
- 11 population as an enriched patient population at risk
- 12 of CDI, as they were described actually to have more
- 13 than 12 percent risk of C. diff infection four months
- 14 after the start of their induction chemo.
- 15 Furthermore, in those patients protection of the
- 16 microbiota from antibiotic dysbiosis is expected to
- 17 lead to additional clinical benefits such as reduction
- 18 of resistance colonization, infections, and even
- 19 prevention of GvHD for those who have to undergo
- 20 (indiscernible).
- 21 The protocol was designed as a
- 22 multicenter randomized placebo controlled parallel arm

- 1 clinical trial and the study was designed and launched
- 2 in a public private partnership with European
- 3 academics via the COMBACTE-NET consortium, co-funded
- 4 by IHI in 2021 and 2022. Next slide.
- 5 An interesting point I wanted to
- 6 highlight today was the discussion we've had with the
- 7 FDA division on the primary analysis in such severe
- 8 at-risk patient population. We actually selected CDI
- 9 occurrence as an event of interest and death as a
- 10 competing risk with cause specific hazard ratio as a
- 11 statistical outcome.
- 12 It's -- we don't really have time to go
- 13 through in details through that today, but this
- 14 analysis proposed was really innovative and was
- 15 actually worked out through collaboration with experts
- 16 from STAT-NET Group in Europe, now part of the e-cred
- 17 network.
- 18 So we managed to launch that clinical
- 19 trial in 13 countries in Europe, but unfortunately we
- 20 had to stop it this summer for operational futility
- 21 because of too low recruitment rates in the hemato-
- 22 oncology settings to conduct the study in reasonable

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1 timelines. So unfortunately at this stage, DAV132

2 development towards prevention of CDI is unfortunately

3 in standby status even though it has shown as a very

4 solid safety and biological efficacy profile in 500

5 individuals. And of course this raises a few

6 questions for the development of such protective

7 therapy. Next slide.

8 So there has been quite a lot of data

9 presented earlier today, so I'm going to go really

10 fast through those slides, especially by the CDC team.

11 But here are a few examples of papers in the

12 literature showing for example here the association

13 correlation between low diversity microbiota and

14 occurrence of CDI clinically and in -- pre-clinically.

15 Next slide.

Those, you know, references been have

17 been as well pointed out early on. It shows the

18 association between low diversity gut microbiota and

19 antibiotic use to colonization by MDROs, which is well

20 described in literature.

21 And finally, next slide, we have a list

22 of papers correlating colonization bacteria -- by

1 threat infections and AMR dissemination.

2 Similarly, some colleagues of the BEAM

3 Alliance developed pathogen-specific antibacterials

4 that have microbiota sparing properties expected to

5 lead to reduced risk of selection of resistance and

6 minimizing the overall burden of resistance. So we

7 all realize that it represents an important

8 competitive advantage in Phase 3 efficacy study to

9 show such an asset as well as in a higher economic

10 valuation.

11 The question is, you know, how could we

12 imagine including new achievable biomarkers such as

13 colonization with bacterial species in the gut

14 associated with mortality and morbidity risk which

15 could then be described and included in the clinical

16 section of a label for a such an antibiotic.

17 And we talked right before with Erin

18 about decolonization strategy and the need for new

19 endpoints as well to be considered there. Otherwise,

20 it's true that those studies are really big. So the

21 next and final take home message that are on my final

You know, there has been brainstorm

22 slide here.

1

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1 resistant bacteria such as ESBL and VRE to increase

2 risk of HAI, especially in severe patients with cancer

3 in ICU or in dialysis. So I've seen a few of those

4 earlier today, so the data behind dysbiosis induced by

5 antibiotics and the cause of those secondary

6 infections is quite there in the literature and

7 recognized with CDC. Next slide.

8 So I would like to end this

9 intervention by sharing a few thoughts after having

10 faced the challenges around DAV132 development path in

11 the prevention of infection, especially putting a few

12 questions on the table for regulators to consider new

13 endpoints. So I'm taking kind of my two hats here, Da

14 Volterra and the BEAM Alliance.

Obviously, with DAV132, clearly co-

16 admins prevention approaches reducing dysbiosis and

17 colonization by bacteria and yeast caused by

18 antibiotics make clear medical sense and today's

19 session is extremely clear indeed about that. So the

20 question is how could we envision to facilitate their

21 access to market considering rather microbiological

22 markers as surrogate endpoints to combat those urgent

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2 together with Da Volterra scientific founder Antione

3 Andremont, microbiologists in Paris, who dreamt of

4 protecting the microbiome while giving antibiotics and

5 obviously today after many, many years and efforts

6 behind, sparing the microbiota from antibiotic

7 dysbiosis and colonization is technically possible.

8 We've done it. We have very solid and

9 nice data but however it's really not yet

10 operationally financially feasible because we are

11 asked to show reduction of secondary infections which

12 necessitates really too large and expensive studies,

13 especially as you know, most of the research is done

14 by SMEs in that field and definitely our belief is

15 that new regulation which could -- which would accept

16 an accelerated path prevention of colonization as

17 endpoints for clinical development would be a really,

18 nearly a necessity to be able to develop that strategy

19 later on for the benefits of individual patients as

20 well as the global control of AMR.

21 So I thank you very much for your

22 attention and happy to exchange later on and these are

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1 the publications for interest.

2 DR. DAN RUBIN: Thank you very much for

3 that presentation. Our next speaker is Vince Wacher.

4 Dr. Wacher is currently the head of corporate and

5 product development at Synthetic Biologics. He has

6 nearly 30 years of experience leading corporate

7 strategy, partnering research, clinical development

8 and intellectual property programs for startups, small

9 companies, and new business units within large

10 companies. Over.

DR. VINCE WACHER: Thank you very much.

12 The -- today I'm going to talk about our product SYN-

13 004 as a potential point of care preventative for

14 healthcare-acquired Clostridioides difficile

15 infection. Today I want to concentrate on the lessons

16 we learned. All of our information is being published

17 and I refer everybody to the publications, but you

18 will hear a little bit of reiteration of the previous

19 talk and some of the challenges that we meet as we try

20 to develop these products. Next slide, please.

21 Synthetic Biologics is a publicly

22 traded company, so our aspirations and our

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1 expectations are all subject to SEC disclosure

2 requirements and our forward-looking statement

3 description is on -- in our presentation, but also in

4 all of our literature that we filed and made public.

5 Next slide, please.

6 So SYN-004 itself is a pretty simple

7 concept. The microbiome is complex. We know that for

8 sure. We also know that the microbiome protects us

9 from different kinds of diseases, and when we damage

10 the microbiome we are subject to all kinds of

11 potential different diseases and one of the worst

12 offenders in this particular instance is beta-lactam

13 antibiotics.

14 So we are looking to prevent the

15 effects of beta-lactam antibiotics on the microbiome

16 and by doing that let the microbiome do the heavy

17 healthcare lifting. Let the microbiome protect us and

18 prevent the diseases. We have in fact advanced, you

19 know, forward to the end of a Phase 2b study looking

20 at Clostridioides difficile infection but also looking

21 at vancomycin-resistant enterococci decolonization and

22 now we're in a Phase 1b2a study looking at acute graft

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1 versus host disease with this product. Next slide,

2 please.

The concept for SYN-004 is very simple.

4 Once the person is admitted to hospital, they get an

5 IV beta-lactam antibiotic. Some of that is excreted

6 into the bile. That moves down and damages the

7 microbiome. SYN-004 is an orally administered beta-

8 lactamase enzyme that is given that is enteric

9 protected. The patient takes that during the time

10 that they're being given this antibiotic. The product

11 passes through the stomach and releases the enzyme

12 into the upper GI tract and it's there waiting to

13 degrade the excess antibiotic that gets into the colon

14 -- sorry, into the GI tract and then breaks it down

15 before it gets the colon.

And that way we preserve this

17 microbiome. Again this is a preventative. We want to

18 make sure that the microbiome is preserved to prevent

19 these diseases. And as you can see, this is something

20 that's done at the time of the antibiotic

21 administration, so a point of care preventative is the

22 way we view this product. We go on to the next slide,

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1 please.

2 So in looking at the life cycle and

3 where we intervene with this product, this is a very

4 simplified model but I hope it helps people understand

5 the kinds of things that enter into the thought

6 process around the development of these point of care

7 preventative. So a patient comes into the hospital

8 with what's called their index infection, their index

9 admission, the reason they come there, and in our

10 Phase 2 study, it was lower respiratory tract

11 infections.

They are treated with an antibiotic.

13 In this case, it was intravenous ceftriaxone. The

14 antibiotic, as we saw, can be excreted into the GI

15 tract and cause dysbiosis and then that can cause

16 damage to the microbiome that ends up leading to

17 Clostridioides difficile infection.

And there's a lot on this slide, but I

19 want to point out that red arrow, that red there where

20 it says C. difficile colonization bloom and

21 toxigenesis. This is a challenge. Twenty percent of

22 us are sitting around here today and we have

1 asymptomatic Clostridioides difficile infection --

- 2 colonization in our gut. Most of us will never end up
- 3 getting an infection, and that is true, too, for the
- 4 hospital population.
- In our study, when we treated the
- 6 patients with IV ceftriaxone, about 3.4 percent of the
- 7 patients got CDI. None of them were pre-colonized.
- 8 Anybody that was colonized when they walked in the
- 9 door of the hospital, they did not get CDI. Everybody
- 10 picked up new colonization. About half of them got
- 11 CDI in hospital and half of them when they left the
- 12 hospital. So that's a challenge. Just having that
- 13 that bacteria in my gut doesn't predispose me
- 14 necessarily to getting the disease.
- 15 Once the person gets CDI, obviously
- 17 different medicines for that, different processes, and
- 18 then the number one challenge or significant
- 19 challenges is this recurrence. Once you've had CDI,
- 20 you're -- you have a dramatic increase in your chances 20 patient burden. It doesn't include the liabilities.
- 21 of getting it again. And in fact, getting recurrent
- 22 CDI, the number one risk factor for getting CDI is

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- 1 That's paid for by insurers by what's called the
- 2 diagnosis-related group, a lump sum payment that
- 3 covers that payment.
- 4 As we go through, if the patients get
- 5 CDI, there's obviously an added cost and the added
- 6 cost can be significant and so here we're saying about
- 7 \$500,000 additional per 1,000 patients. And then
- 8 there's recurrence and the cost of that is even
- 9 higher, so another \$300,000 on top of that. And this
- 10 is before we consider mortality, before we consider
- 11 the patient burden, before we consider potential
- 12 penalties. Just as a as a simple baseline, let's look
- 13 at the \$810,000 worth of increased cost per 1,000
- 14 patients.
- 15 If we go to the next slide, point of
- 16 there's treatment and management involved and there sl6 care prevention has the opportunity to really knock
  - 17 that down. That's a 70 percent decrease in the total
  - 18 cost, just in this very simple model. That doesn't,
  - 19 again, include the death. It doesn't include the

  - 21 But the challenge here is how much is
  - 22 this intervention worth? Is it something that you

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- 1 having previously had CDI. That doesn't really help
- 2 us when we were trying to prevent primary CDI.
- 3 So there's two things that we should be
- 4 thinking about now before we get onto even the bigger 4 issues.
- 5 challenges. One is having the bug doesn't equal
- 6 getting the disease. And second of all, the risk
- 7 factors involved require that you either were
- 8 previously in hospital or previously have had disease.
- Underneath, some numbers. And this is
- 10 just an example because one of our challenges here is
- 11 how do we define the value of this intervention?
- 12 Medically unquestioned. Patients don't want to get
- 13 it. Doctors don't want patients to get CDI. There's
- 14 about 46,000 deaths a year from CDI. Clearly,
- 15 preventing CDI is a medical imperative but there is a
- 16 challenge. And the challenge is these clinical trials
- 17 don't happen for free.
- 18 So let's have a quick look underneath
- 19 there at the way this potentially works, a very
- 20 simplified model. So the absolute numbers are not
- 21 important. But for say 1,000 patients come to the
- 22 hospital and they're treated with the antibiotic.

- 1 have to break even or is it something that has a more
- 2 expansive value because once we start including the
- 3 mortality, the patient burden, and all these other
- 5 So that's been one of the underlying
- 6 challenges of development in this space is defining
- 7 the value, and I don't mean the therapeutic value. I
- 8 mean for someone who's going to pay to develop this
- 9 product, what is the value that enables them to come
- 10 forward and actually to develop this program? Next
- 11 slide, please.
- 12 So I want to give you three of our four
- 13 key lessons on this slide and the first, based on our
- 14 experience with Clostridioides difficile infection, is
- 15 that the trials are large and costly. And part of the
- 16 reason is that you have to treat everybody that comes
- 17 in, because as I said before, just having that CDI --
- 18 the Clostridioides difficile in your gut really
- 19 doesn't help you pick the patient population because
- 20 it doesn't necessarily mean that patient is going to
- 21 get the infection, which is the actual disease, the
- 22 actual disease outcome.

Meeting Page 306 Page 308 1 The other, as we know these are 1 you're not familiar with this, if you're in the lowest 2 patients in hospital. So there are adverse events and 2 25 percent of hospitals that are -- based on your 3 there are deaths and balancing out the incidence of 3 healthcare-acquired infectious scores, you're 4 the disease with the incidence of the adverse events 4 penalized 1 percent of all of your Medicare 5 and deaths again requires a large number of patients 5 reimbursements per year, and then your name -- naughty 6 to try and tease those apart so you can get a proper 6 list. There's a public list of hospitals that are in 7 therapeutic outcome from your clinical trial. And so 7 that lower 25 percent, so nobody wants that. 8 when we looked at this for our Phase 3 study, that's 8 So on top of that, there's a potential 9 about 4,000 patients and then we're up to about \$100 9 liability from patients and patient advocates and the 10 million. That is a very, very large amount of 10 lost revenue to the hospital of having to deal with 11 clinical trial funding required and gets back to this 11 this. So the hospitals are extremely keen to use the 12 concept of how do we convince people to -- this is 12 product, but they don't pay for the development of the 13 something that should be paid for? 13 product. And then the next slide please. 14 The second lesson in all of this was 14 The lesson that that absolutely stopped 15 really that clinical trial recruitment is difficult. 15 us in our tracks when we first heard it -- I mean, it 16 As you can see, if our incidence is about 3 percent in 16 hasn't stopped us moving the product forward but this 17 our population, there is no immediate benefit to 97 17 was an absolute jaw dropper. We were looking around 18 percent of the patients that come in. None. Ninety-18 for partners for this program and got this specific 19 seven percent of the patients won't get anything from 19 feedback and -- to our face. Incidence is low. Drugs

20 this. So that's a philosophical challenge to get 20 are cheap. Just treat the CDI. 21 21 patients into the study. That's a problem. That's a value 22 The other is, and we found this out 22 perception problem because if I have to find 4,000

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1 very quickly, is when you start talking about CDI, 2 doors start closing because hospitals and healthcare 3 facilities are working extremely hard to not have CDI 4 or any other of the potential hospital-acquired 5 infectious organisms in their institutions. So it's 6 quite difficult to actually get these trials up and 7 running. 8 And then the third thing we learned in 9 in the market outreach study was that hospitals are 10 the primary customer, and I mean this from a from a

11 financial point of view, not necessarily from a 12 therapeutic point of view. Hospitals are the ones 13 that bear the burden because the insurers, they look 14 at it and go well if this person has had an adverse 15 outcome, a hospital-acquired infection from your index 16 admission, you should just pay for it out of what we 17 gave you for the original infection. So the payers 18 aren't really thinking about it that way. So that 19 means there's a shortfall in the overall payment to 20 the Hospital. 21 There are also healthcare acquired

22 condition reduction programs from Medicare, and if

1 patients and \$80 to \$100 million, I need people to

2 understand the value. So this is a significant

3 challenge in the development of preventatives for

4 these kinds of infections, because again we know

5 medically, we know therapeutically it's valuable. How

6 do you make this value proposition to people that will

7 pay for the drug development. So if we go to the next

8 slide, please.

So some of the things, and I'm just 10 going to reiterate, echo what I think we've heard a

11 lot today. We need to find some risk factors and some

12 biomarkers that help us with patient pre-selection and

13 things that we can follow in a meaningful timeframe

14 and an affordable timeframe to actually be able to say

15 this product is something we can develop. We can take

16 it to the market and patients will use it to protect

17 patients from these kinds of diseases.

18 The other thing that -- this is

19 something that we're pursuing now and as was said in

20 the previous talk, can we conduct trials in patient

21 populations with higher incidences of the endpoint and

22 bone marrow transplant patients is one and we're

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1 moving forward with a study in the bone marrow

- 2 transplant patient population. And just one more
- 3 slide.
- 4 Because I've talked a lot about money,
- 5 but let's face it at the end of the day this is
- 6 feedback from a chief medical officer of a hospital
- 7 that's very encouraging. We want to heal people. We
- 8 want to do it the right way. I think that within
- 9 these hospitals if the products are available, they
- 10 will be willing to pay for it for therapeutic reasons,
- 11 but also for the to protect themselves.
- 12 So I think the value is there. The
- 13 opportunity is that if we can overcome that energy of
- 14 activation, that financial challenge and be able to do
- 15 trials that get us to the market. And with that,
- 16 thanks very much for listening and thank you for the
- 17 invitation.
- 18 DR. JOHN JERNIGAN: Thank you very
- 19 much, Dr. Wacher. Our next talk is Defined Bacteria 19 and in the next few slides, I'm going to show you that
- 20 Consortia, a Novel Approach to Tackle Healthcare-
- 21 Associated Infections given by Dr. Silvia Caballero.
- 22 Dr. Caballero is director of infectious diseases at

1 developed our lead drug product, VE303 to reestablish

- 2 organization resistance against C. difficile and
- 3 restore a protective gut environment. Next slide.
- 4 VE303 is a defined bacterial consortium
- 5 consisting of eight well characterized strains
- 6 isolated from healthy human donors, which makes VE303
- 7 a safter alternative to FMT, given that there is no
- 8 donor material and therefore the likelihood of
- 9 pathogen transfer distinction is essentially zero.
- 10 We selected this consortium based on
- 11 its ability to prevent C. difficile infection and
- 12 restore beneficial metabolites in preclinical models.
- 13 Each strain is grown from clonal cell banks under GMP
- 14 conditions, enabling a pure and consistent drug
- 15 product with the same quality attributes from batch to
- 16 batch.
- 17 Also, the manufactured drug is stable,
- 18 which enables flexible storage conditions and dosing,
- 20 VE303 is able to colonize human subjects and prevent
- 21 C. diff (indiscernible). Next slide.
- 22 VE303 was given to healthy volunteers

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- 1 Vedanta Biosciences in Cambridge, Massachusetts. She
- 2 is also the head of Vedanta's multidrug resistance
- 3 program aimed at reducing risk of MDRO infections by
- 4 promoting reduction of intestinal carriage with
- 5 defined bacterial consortia. Dr. Caballero.
- DR. SILVIA CABALLERO: Thanks, John,
- 7 for the introduction and thanks to the organizers for
- 8 the invitation.
- Today, I'm going to be sharing with you
- 10 some of our learnings from recent clinical as well as
- 11 pre-clinical studies using microbiome therapeutics
- 12 based on bacterial consortia specifically in the
- 13 context of CDI and MDR decolonization. Next slide.
- 14 As we've heard from multiple speakers
- 15 today, one of the major risk factors for C. difficile
- 16 infection and expansion of MRDOs is treatment with
- 17 broad spectrum antibiotics. This causes a disruption
- 18 of the microbial ecosystem in the intestine and
- 19 reduces the pool of beneficial metabolites such as
- 20 secondary bile acids and short-chain fatty acids which
- 21 have been shown to be important for preventing CDI.
- 22 And with this in mind, we at Vedanta

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- 1 in a Phase 1 study where the goal was to evaluate
- 2 safety and tolerability of the drug adding from the
- 3 dose for our Phase 2 study in (indiscernible)
- 4 patients. We had multiple culprits that were given
- 5 differing doses of VE303 on a single day or multiple
- 6 days after every course of vancomycin.
- 7 Pharmacokinetics for us in the
- 8 microbiome field refers to detection of the drug
- 9 components in the host, which is what this one is
- 10 showing. So on the Y axis, there is a number of VE303
- 11 strains detected in these patient cohort and on the X
- 12 axis is time from the start of dosing out to one year.
- 13 And what we observed was that the
- 14 multiday culprits that received the highest VE303 dose
- 15 showed the most robust and persistent colonization
- 16 where we were able to detect 100 percent of the VE303
- 17 strains. Another takeaway from the study was that in
- 18 the absence of vancomycin, our strains (indiscernible)
- 19 on the scan, and that's the panel that I'm showing on
- 20 the right.
- 21 Pretreatment with an antibiotic, as we
- 22 know, reduces microbial density which in our case

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1 helps create a niche for our strains so that they can2 colonize. So this is an important consideration for

- 3 microbiome-based therapeutics to ensure that the drug
- 4 product is able to get in. And in the case of CDI
- 5 patients, they are already getting antibiotics as part
- 6 of their standard of care, so no additional
- 7 antibiotics are necessary.
- 8 Lastly, I'm not showing this data, but
- 9 we also saw recovery of the indigenous microbiota and
- 10 beneficial metabolites which refers to the
- 11 pharmacodynamics of the drug. And as far as safety is
- 12 concerned, there were no severe adverse events
- 13 associated with VE303. Next slide.
- 14 So that was our Phase 1 study. Then we
- 15 moved to a Phase 2 studying in CDI patients to assess
- 16 efficacy of VE303. So here I'm going to show you some
- 17 of our key findings. This plot, and I apologize it's
- 18 so small, shows the probability of being recurrent
- 19 free. So the larger the number, the better. Once
- 20 again, we found that dose levels do matter. We had
- 21 two groups of patients, one that received a low dose
- 22 of VE303 which is shown in red and a second one that

- 1 didn't refer had a higher level of colonization of the
- 2 majority of VE303 strains, so that's the blue line,
- 3 again suggesting that colonization of our drug is a
- 4 strong predictor of cure. Next slide.
- 5 And last but not least, microbiota
- 6 recovery is also important for clinical success. We
- 7 saw that responders, here shown in blue, had a more
- 8 diverse microbiome than non-responders, and this
- 9 increase in diversity was much more pronounced in the
- 10 high dose group. Next slide.
- 11 So switching gears a bit, we also have
- 12 a program where the focus is on gram-negative bacilli.
- 13 This is our VE707 program, currently in a preclinical
- 14 stage where the goal is to educe defined bacterial
- 15 consortia to prevent infection in the hospital setting
- 16 by reducing carriage of these organisms in intestine.
- 17 And we're specifically looking carbapenem-resistant
- 18 Enterobacteriaceae producing E. coli and Klebsiella
- 19 pneumoniae.
- 20 As others have mentioned, the clinical
- 21 evidence that decolonization translates to less
- 22 infections is very strong. This has been demonstrated

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- 1 received a high dose, which is indicated by the blue
- 2 line, and this is the dose that we selected based on
- 3 the Phase 1 data.
- 4 As you can see, there was no difference
- 5 in outcomes between the low dose and placebo, which is
- 6 shown in gray, and only the high dose met our primary
- 7 efficacy endpoint where we saw an 85 percent sustained
- 8 cure rate, which is comparable to what has been seen
- 9 with FMT.
- 10 Interestingly, most of the action seems
- 11 to happen -- seems to be happening within these 14-day
- 12 window which is the area highlighted in blue where we
- 13 observed the most recurrences in all groups, but once
- 14 the treatment course was completed, difference in
- 15 efficacy became very clear. Next slide.
- And what we know is that around this
- 17 timeframe, the prevalence of VE303 strains is much
- 18 higher in the high dose group shown in red compared to
- 19 the low dose group, and that's the panel that I'm
- 20 showing in the upper right corner. And if we stratify
- 21 these patients based on clinical response -- that's
- 22 the panel below -- you can see that the patients that

- 1 with selective digestive decontamination and fecal
- 2 microbiota transplantation, but there are caveats
- 3 associated with these modalities, as we know.
- 4 I the case of SDD, antibiotics can
- 5 foster the development of resistance and also the
- 6 ecological dysbiosis which is the main culprit for
- 7 colonization and infection is not addressed, which is
- 8 why recurrence rates tend to be a bit high with SDD.
- 9 And for FMT, as we know, the main issue is donor and
- 10 batch-to-batch variability which we know can impact
- 11 the efficacy of the FMT material. Next slide.
- 12 There are several patient populations
- 13 where the risk of MDRO infection goes up
- 14 significantly, if they happen to be colonized and one
- 15 of them is the bone marrow transplant population.
- 16 This is just an example of the microbiota changes that
- 17 these patients go through during the course of the
- 18 transplant. They start out with a very diverse
- 19 microbiota. These are indicated by the brown and gray
- 20 colors. And once antibiotics are administered,
- 21 pathogens like E. coli, shown in red, emerge and
- 22 increase in abundance days before it is detected in

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1 the bloodstream, in the case of this one patient.

2 This particular infection was readily

3 treated with antibiotics and you can see E. coli going

4 away, but we then see a massive expansion of another

5 pathogen, vancomycin-resistant enterococcus, which now

6 puts the patient at risk for VRE infection.

7 So having a surveillance system in

8 place where patients are routinely monitored for

9 colonization can be extremely helpful to identify a

10 timeframe where we can intervene and minimize the risk

11 of conversion from colonization to infection. Next

12 slide.

13 And something that's important that we

14 need to remember is that complete MRDO elimination is

15 not required for infection prevention. FMT studies

16 like the one that I'm referencing here have shown that

17 the risk of MDRO infection can be significantly

18 reduced despite modest decolonization. And that's

19 because in addition to reducing carriage to low enough

20 levels which is important, there the other functions

21 that microbiota exert on the host, like the production

22 metabolized that produce -- that promote health and

1 by doing so we also hope to be able to reduce

2 antibiotic use in the clinic. Thanks very much.

3 DR. DAN RUBIN: Thank you very much,

4 Dr. Caballero. Our final speaker of this session is

5 Matt Henn. Dr. Henn is executive vice president and

6 chief scientific officer at Seres Therapeutics. He

7 has been involved in the discovery and development of

8 multiple microbiome therapeutics across infectious,

9 inflammatory, and oncology indications. Over.

10 DR. MATTHEW HENN: Good afternoon. Let

11 me start by thanking the organizers of this timely and

12 important workshop for the opportunity to speak today

13 about Seres microbiome therapeutic technologies and

14 our progress on deploying our novel drug technologies

15 to combat bacterial infections and AMR. Next slide,

16 please.

17 In the next ten minutes, I'll provide a

18 quick snapshot on how we are advancing novel

19 microbiome therapeutics that are consortia of multiple

20 species of bacteria. Briefly, our drugs are designed

21 to have the bacteria engraft into the gut, meaning

22 they germinate and vegetatively grow in patients' GI.

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1 reestablishment of the gut epithelial barrier which

2 together limits the ability of these pathogens to

3 become invasive. Next slide.

4 So going back to VE707, we tested

5 around 60 defined bacterial consortia in mouse models

6 of colonization and VE707 was the most potent

7 (indiscernible) where we saw at least 1,000-fold

8 reduction in klebsiella and E. coli carriage over

9 time.

Now, we think this degree of

11 decolonization could be clinically meaningful based on

12 evidence from (indiscernible) and others where it is

13 more common to see high infection rates in patients

14 who are dominated or have high titers of an MDRO.

15 Next slide.

Okay, so in closing, we understand that

17 there are many challenges but we believe that we can

18 make a difference in the lives of these patients,

19 especially those that are high risk, by modulating the

20 microbiome. In the case of CDI, we have shown that it

21 is possible to do this and the same idea applies for

22 decolonization and an MDRO infection prevention where

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1 Engraftment is a measure of the drug's

2 pharmacogenetics.

Next, the engraftment of bacteria from

4 our investigational drugs leads to broader

5 restructuring of the microbiome and modulation of the

6 metabolic landscape of the gut. These are measures of

7 the drug candidate's pharmacodynamics. These are --

8 importantly with our technology we're engrafting

9 several species at the same time with a single

10 investigational drug. This allows us to attempt to

11 modulate multiple disease relevant pathways at the

12 same time with one treatment. Next slide, please.

13 As heard throughout today, the

14 increasing emergence of AMR is a significant public

15 health threat. It is a slow pandemic. Recently in a

16 review of the global impact of AMR in The Lancet,

17 bloodstream infections tied to AMR were identified as

18 a major cause of death. As those involved in this

19 workshop know well, there has been limited innovation

20 in new antimicrobials despite the growing impact of

21 AMR and as we've heard multiple times today,

22 beneficial microbes in our gut are an important piece

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2 Microbiome therapeutics provide a novel

1 of the puzzle in combating infection and AMR.

3 approach to manage AMR and their mechanisms of action

4 are potentially less susceptible to the emergence of

5 resistance. Moving a slide forward, please.

6 Data from our ECOSPOR III study of SER-

7 109 shows that this novel therapeutic modality can

8 work successfully in the clinic. As published earlier

9 this year in The New England Journal of Medicine, SER-

10 109 achieved superiority compared to placebo at eight

11 weeks of follow up. Only 12.4 percent of subjects in

12 the SER-109 arm recurred in the C. difficile patients,

13 whereas 39.8 percent of subjects in the placebo arm

14 recurred.

15 This translates to a sustained clinical

16 response of 88 percent. The relative risk at eight

17 weeks, which was the primary endpoint, was highly

18 significant at 0.32 but the upper bound of the 95

19 percent confidence interval is well below the

20 threshold predefined for the trial to be a single

21 pivotal trial.

While not shown here, results from our

1 I'm showing data here that supports

2 some of the mechanisms of action of SER-109 in

3 establishing colonization resistance to C. difficile.

4 As shown in the left panel, we observed significant

5 engraftment of bacteria in our drug as compared to

6 placebo patients. Here we are reporting the total

7 number of drug species observed. Engraftment is rapid

8 and durable with significant signatures observed

9 rapidly and as early as one week, which is important

10 in the context of treating an infectious disease.

11 Engraftment leads to restructuring of

12 the disrupted disease state microbiome and modulation

13 of the metabolic landscape in the gastrointestinal

14 tract. As example shown on the right in the log scale

15 plot, this includes a significant increase as compared

16 to placebo patients in secondary bile acids that

17 inhibit C. difficile vegetative growth and not shown

18 on the graph a reciprocal depletion of primary bile

19 acids that stimulate C. difficile spore germination.

20 Next slide, please.

21 I'll now switch gears to focus on

22 observations that SER-109 can reduce additional

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1 ECOSPOR IV open label safety study were confirmatory

2 of these results and demonstrated comparable sustained

3 clinical response rates in both multiple and first

4 recurrent patients. In both ECOSPOR III and IV, SER-

5 109 was well tolerated with most adverse events being

6 GI related. As stated publicly previously, we are in

7 the final stages of a BLA submission for SER-109.

8 Next slide, please.

9 SER-109 was designed to restructure the

10 gastrointestinal microbiome and modulate the metabolic

11 landscape in the GI to establish colonization

12 resistance to C. difficile. Pathogenesis of C.

13 difficile infection is a two-hit process. The first

14 hit is the use of broad spectrum antibiotics that lead

15 to loss of beneficial bacteria and their associated

16 functions which play a dominant role in host defense,

17 leaving the patient with a disrupted microbiome that

18 is vulnerable to potential pathogens.

The second hit is patient exposure to

20 C. difficile spores. These pathogenic spores

21 germinate into the toxin producing bacteria that lead

22 to diarrhea and colitis. Next slide, please.

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1 pathogens that harbor antimicrobial resistance.

2 Treatment with SER-109 rapidly and significantly

3 reduced the abundance of proteobacteria in patients'

4 guts. These are the bacteria that harbor antibiotic

5 resistance genes. As shown in the plot on the left,

6 the proteobacteria in the Enterobacterales and

7 Enterobacteriaceae that were most significantly

8 reduced are also those significantly associated with

9 more frequent carriage of genes that confer

10 antimicrobial resistance.

11 The Y axis shows statistical

12 significance in terms of negative log P values. As

13 has shown on the right side, SER-109 treatment leads

14 to significant reduction in the total abundance of

15 antimicrobial resistant genes in the gastrointestinal

16 tract of patients as compared to placebo. Our SER-109

17 program provides strong in-human proof of concept that

18 a microbiome therapeutic has the potential to be a

19 novel technology to address AMR and decolonize

20 potential pathogens. Next slide, please.

21 Seres microbiome therapeutics provide a

22 novel potentially transformative technology for the

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1 protection from the treatment of infections, AMR, and

- 2 bacteremia. As noted earlier, a disrupted
- 3 gastrointestinal microbiome can lead to domination in
- 4 the gut by undesirable microbes and we've heard about
- 5 that multiple times today. It can also lead to the
- 6 breakdown of the mucosa and epithelium that can lead
- 7 to bloodstream infections resulting from bacterial
- 8 translocation.
- 9 Seres consortia are designed to restore
- 10 colonization resistance to pathogens, bacteria, and
- 11 our drugs can out compete pathogens and inhibit their
- 12 growth through nutrient competition and other
- 13 mechanisms. This can decrease pathogen abundance in
- 14 the gut which both potentially reduces the likelihood
- 15 of patient-to-patient transmission and of bacterial
- 16 translocation to the bloodstream.
- 17 Our drug candidates are specifically
- 18 designed to also reduce translocation through
- 19 enhancing epithelial barrier integrity. And lastly,
- 20 our drug candidates are designed to modulate immune
- 21 responses. Next slide, please.
- I will now transition to our SER-109 --

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- 1 sorry, SER-155 program specifically. Building on the
- 2 data and the mechanisms I just spoke about, we have
- 3 designed SER-155 using our reverse translational MVTX
- 4 discovery platform. Briefly, SER-155 is an
- 5 investigational consortium of a unique human commensal
- 6 bacterial strains that are cultivated from master cell
- 7 banks and encapsulated for oral delivery. SER-155 is
- 8 currently in a Phase 1b study that targets assessment
- 9 of drug safety and drug pharmacology in hematic stem
- 10 cell transplant patients that are highly
- 11 immunocompromised and susceptible to VRE and CRE
- 12 colonization and bloodstream infections. Next slide,
- 13 please.
- In the case of SER-155, we optimized
- 15 the consortia to have a powerful effect in directly
- 16 decolonizing CRE and VRE. These bacterial species are
- 17 frequent pathogens in people receiving stem cell
- 18 transplants as well as in a broad spectrum of
- 19 antimicrobial resistant infections in various hospital
- 20 settings that we heard about a couple of times today.
- 21 As shown here in mouse models of VRE
- 22 and CRE colonization shown on the left and right

1 respectively where mice are first infected and heavily

- . .
- 2 colonized with VRE or CRE, the red lines, subsequent
- 3 therapeutic oral administration of SER-155, the blue
- 4 lines, led to significant 2 to 3 log reductions in VRE
- 5 and CRE titers in the gut compared to untreated mice.
- 6 Notably, these reductions in VRE and
- 7 CRE occur rapidly after SER-155 dosing. SER-155 also
- 8 includes bacteria that produce metabolites that have
- 9 the potential to prevent bacterial translocation and
- 10 reduce graft versus host disease. Next slide, please.
- 11 As I noted earlier, SER-155 is
- 12 specifically designed to also improve epithelial
- 13 barrier integrity and is effective in doing so in our
- 14 in vitro primary colonic membrane assay. In this
- 15 screening model, an intact epithelial barrier is
- 16 established and as shown in the left panel treatment
- 17 with interferon gamma alone will lead to epithelial
- 18 damage and permeability.
- 19 In this model, we include consortia
- 20 that are designed to not produce the metabolites that
- 21 we have optimized SER-155 to produce. As you can see,
- 22 these negative consortia are not protective of the

- 1 epithelium. In contrast, SER-155 is protective and
- 2 achieved significant greater barrier protection than
- 3 both experimental controls.
- 4 This pharmacological property of SER-
- 5 155 enhances its potential ability to protect patients
- 6 from infections, not only by targeting the pathogens
- 7 directly to decolonize them, but also by reducing the
- 8 ability of the pathogens to translocate from the GI
- 9 tract to the bloodstream.
- As shown on the right, SER-155 also is
- 11 designed to modulate immune responses that are of
- 12 relevance to graft versus host disease.
- 13 Unfortunately, I don't have time to cover that data
- 14 today, but those can review the slides after which are
- 15 publicly available. Next slide, please.
- 16 So Seres is committed to advancing
- 17 microbiome therapeutics as a novel technology to
- 18 combat infections and AMR. In addition to SER-109 and
- 19 SER-155, we have active programs in multiple high risk
- 20 populations including cancer, neutropenia, cirrhosis,
- 21 and several others of the populations discussed
- 22 earlier today.

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1 Our preclinical and clinical data

- 2 support that our investigational products can
- 3 directly decolonize various GI pathogens and that they
- 4 have the potential to prevent infections,
- 5 translocation, and bacteremia. I've touched today on
- 6 some of the novel mechanisms of Seres' drug
- 7 technologies and I'll close by providing a few
- 8 considerations based on our experience over the past
- 9 ten-plus years in developing these drugs that are
- 10 important as we broaden the arsenal of microbiome
- 11 therapeutics.
- 12 These include continuing to improve the
- 13 translatability of our preclinical screens and models
- 14 for lead optimization; continue to enhance methods to
- 15 evaluate drug PK, PD, and dosing strategies; refining
- 16 our understanding of patient subpopulations on disease
- 17 pathogenesis and drug pharmacology; developing drug
- 18 formulation strategies that optimize patient access
- 19 and can capture the broad breath of microbial biology
- 20 we have accessible to us; and lastly scaling GMP
- 21 manufacturing capabilities to be able to leverage
- 22 those and manufacture those.

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- So I'll go to the last slide, please 2 and just like to close by thanking really many folks
- 3 who helped make this work possible and our
- 4 collaborators to advance and most importantly, I'd
- 5 really like to take a minute to specifically
- 6 acknowledge the patients and the clinical
- 7 investigators that participate in our trials and
- 8 really make the ability to advance these programs
- 9 possible. Thank you.
- 10 DR. JOHN JERNIGAN: All right. Thank
- 11 you, Dr. Henn, for a fascinating presentation and
- 12 thanks to all the speakers for what really I think was
- 13 a great stimulating and encouraging and hopeful
- 14 session. So thank you all for the work you put into
- 15 those.
- 16 We'll take a brief break now and
- 17 reconvene at 3:50. So that brings us to an end of
- 18 this section. Again, we'll see you again at 50 --
- 19 that's five, oh -- minutes after the hour, 3:50
- eastern time. Thank you. Bye bye.
- 21 (Break)
- 22 MICHAEL CRAIG: Welcome back,

- 1 everybody. This is Michael Craig, the director of
- 2 Antimicrobial Resistance at CDC and I'm joined by my
- 3 colleague Peter Kim. Peter, do you want to introduce
- 4 yourself?
- DR. PETER KIM: Yes. Thank you, 5
- 6 Michael. My name is Peter Kim. I'm the director of
- 7 the Division of Anti-Infective in the Office of
- 8 Infectious Diseases in the Center for Drugs at FDA.
- 9 Thank you for joining us today.
- 10 MICHAEL CRAIG: And Peter --
- 11 DR. PETER KIM: -- back over to you,
- 12 Michael.
- 13 MICHAEL CRAIG: Thank, Peter. Peter
- 14 and I are going to be moderating the last session here
- 15 for today's meeting, and I wanted to note to everybody
- 16 that what we're going to be doing here is actually
- 17 having a Q&A session, a question and answer session
- 18 with the panelists that you heard throughout the day
- 19 today. So as you can see on the screen there, there's
- 20 a list of panelists from FDA, CDC, as well as the
- 21 external panelists that we had, and there are three
- 22 questions that Peter and I are going to be asking the

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- 1 panelists and we're going to be having time allotted
- 2 for each of these.
- 3 So we have roughly half an hour
- 4 allotted for each of the three questions and we're
- 5 going to have the panelists -- we're going to start
- 6 with specific panelists and then have the panelists
- 7 raise their hand in the Zoom function and then we're
- 8 going to call on them and hear from them about their
- 9 thoughts on each of these questions.
- 10 So it's sort of an open conversation
- 11 and I think a great opportunity for us to hear more
- 12 about some of the specific issues that we've heard
- 13 today and areas that we think are maybe greatest need
- 14 or areas of potential challenge that that we'd all
- 15 like to overcome. So with that, why don't we get
- 16 started. And as you can see there, question one is
- 17 please discuss the greatest needs for drug product
- 18 development for the prevention of healthcare
- 19 associated infections. And I think we were -- we've
- 20 been talking about including it within that
- 21 antimicrobial resistant bacteria. And you heard a lot
- 22 from that in the morning session.

Meeting Page 334 Page 336 1 So we're actually going to kick this 1 and anti-infective coated devices which really didn't 2 off with Dr. Bob Weinstein and hear from him on his 2 discuss much today, seems like a good idea but has 3 thoughts on question one. Dr. Weinstein, why don't 3 never yet made a major splash and maybe that could be 4 you turn on your camera and unmute yourself. 4 reconsidered. 5 DR. ROBERT WEINSTEIN: I'm unmuted. 5 A second area is product development 6 When I go to turn on my camera, it says, you cannot 6 for GI tracts which has been discussed extensively 7 start your video because the host has stopped it. 7 today and I'm not going to go over any more of that. 8 MICHAEL CRAIG: Okay. A third area is for treatment of 9 DR. ROBERT WEINSTEIN: So host, unstop 9 infections and I want to add to today's discussion two 10 it. So while we're waiting for that I'll go ahead. I 10 things that I didn't hear and that's development of 11 think as demonstrated by today's great symposium, the 11 antibiotics that delay or defeat or resist bacterial 12 great need is brainstorming. And although I commented 12 resistance, especially for those pathogens such as 13 that infection control bundles might be parsimonious, 13 Pseudomonas aeruginosa that can spin off resistant 14 I think research has to be broad based. So I want to 14 progeny with great proficiency. Something like 15 15 comment on four general areas of need for product 15 percent of Pseudomonas aeruginosa become resistant 16 development, some of which have already been 16 during the course of therapy, so we need antibiotics 17 highlighted today by outstanding talks, and I will try 17 that can overcome that. 18 to highlight what I see is one of them which I see as 18 And also we should consider whether 19 the greatest need. 19 advanced molecular diagnostics can be used to alert 20 So the first of the four is the role of 20 prescribers to the presence of even low levels of pre-21 topical agents, antimicrobials and antiseptics 21 existing resistant elements, for example in the 22 considered broadly to include topical decolonization 22 patient's stool (indiscernible) mucosa that might help Page 335 Page 337 1 of the fecal patina which has been a highly successful 1 when the prescriber has to choose between different 2 approach and patients need to be bathed anyway, so in 2 classes of antibiotics. So that might be directed in 3 my view, I see this as the potential for the greatest 3 part by knowing what resistance pre-exists there. 4 4 need which could include bringing this approach to And the final, the fourth areas to 5 develop products that attack bacterial mechanisms 5 additional venues, assess additional agents besides 6 chlorhexidine in the event that resistance develops or 6 facilitate infection. I didn't hear a discussion 7 more because of some agents like clostridium difficile 7 today -- I may have missed it -- about products to

8 may have very high MICs for chlorhexidine, and so 9 assess topicals that might get into deeper layers of 10 the dermis. 11 We saw in one of the slides this 12 morning about hair follicles having MDROs in them and 13 there may be some agents that may get better into hair 14 follicles. 15 I think also as systemic antibiotics 16 are developed they could be assessed for the 17 possibility of excreting antibiotic into the sweat 18 perspiration so that axillary glands might have

19 antibiotics in them which might control or prevent

21 pros and cons as everything does today.

22

20 development of MDRO fecal patina. All of these have

In the category of topicals, you know,

8 block quorum sensing so that bacteria cannot 9 communicate with each other. There's no 10 communication, no infection, there'll be no 11 resistance. We've already heard about compounds that 12 destroy or inhibit biofilms. We talked about 13 monoclonal antibodies and there's a lot of the 14 literature about compounds that attack virulence, that 15 is, make MRSA less virulent. But of all these again for product 17 development, as I said at the outset, my personal view 18 is the approach to control the fecal patina which I 19 believe plays a pivotal role in the epidemiology of 20 many MDROs and control of the fecal patina has had an 21 impressive impact on the risk of spread and infection 22 with a variety of resistant strains, bacteria and

16

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1 potentially fungi. And I think we should capitalize

2 and improve on these successes. That's my view.

3 MICHAEL CRAIG: Thank you, Dr.

4 Weinstein. Other speakers, other panelists, who would

5 like to share their thoughts on this question? What

6 are some of the areas of greatest need from your

7 perspective and point of view, and please use the

8 raise hand features so that we can get -- identify

9 folks and get them in order. The raise hand feature

10 is at the bottom of the screen. Lilian Abbo.

11 DR. LILIAN ABBO: Hi. I agree with

12 everything Dr. Weinstein mentioned. I think another

13 area where we have great need is more effective

14 antimicrobials to decolonize against Candida auris and

15 more effective therapies. We have a very limited

16 armamentarium and so far nothing has worked for

17 decolonization other than repopulating the gut, and as

18 we saw many of these, you know, gut microbiota

19 products that are being developed are targeting

20 bacterial pathogens, but we also need to think of

21 fungal pathogens that are emerging with increased

22 resistance and very rapid horizontal transmission.

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And then if there is any topical

2 antimicrobial that can substitute and improve hand

3 hygiene and make it even easier than alcohol and water

4 and soap, I think that would be a Nobel prize winner

5 because we would stop a lot of the problems as well.

6 Thank you.

7 MICHAEL CRAIG: Thank you, Dr. Abbo.

8 And Matthew Henn.

9 DR. MATTHEW HENN: Sure. Thanks,

10 Michael. You know, I think the thing I'll emphasize

11 as well, we heard about it quite a few times today

12 throughout multiple different talks, is really

13 thinking about what the proximal cause of disease is

14 in some of these settings, and so there I really think

15 about that need to really think about the

16 gastrointestinal microbiome and the important role

17 that it plays in the pathogenesis of multiple of these

18 different diseases that we talked about and how we

19 think about restructuring that microbiome, protecting

20 that microbiome, because I think we know that that has

21 pretty substantial implications both in terms of the

22 ability to establish colonization resistance but as

1 well as general health of patients as well, and so I

2 think as we think about that as a target that's

3 important for us to keep that in mind.

4 MICHAEL CRAIG: Thank you. Other

5 panelists. I am not going to be shy about calling on

6 folks if you don't raise your hand. There was great

7 conversation today and many engaging talks. There's

8 Dr. McDonald. Cliff.

9 DR. CLIFFORD MCDONALD: Yeah, thank

10 you, Michael. I would maybe add and maybe this is for

11 FDA to comment on, is what would be the studies that

12 could be done that would perhaps lift the entire field

13 around establishing surrogates and what do they see

14 maybe as most important? Maybe it is -- could be a

15 couple of these larger studies. I think we've heard

16 several in industry talking about the prohibitive size

17 of studies and what would those need to be to help

18 establish surrogates that then could smooth a pathway,

19 building the better mousetrap to achieve reaching

20 surrogates.

21 MICHAEL CRAIG: Thank you, Cliff. And

22 I think some of that response, I think touched on some

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1 of our questions two and three that we're going to get

2 to momentarily, but thanks for teeing those up for us.

3 Want to still focus on, you know, what are the areas

4 of greatest need. I'm going to take the moderator's

5 prerogative here and actually call on Susan Huang.

6 She's worked in this field very extensively and had a

7 great presentation earlier today. Dr. Huang, what do

8 you see as some of the areas of greatest need for

9 product development?

DR. SUSAN HUANG: I think that there's

11 a lot of good questions out there. I think we're

12 going to need to move faster and be able to do

13 pragmatic trials. I think one way in order to do that

14 is to actually continue to enable the trials that are

15 done while you're in a learning health system to

16 actually matter for FDA indications. So I think

17 there's a real use case to talk about, what does it

18 take to do that when they're created to be real

19 pragmatic trials and influence what happens today.

20 So that's one of the things that I

21 think there's great questions, but we need more trials

22 and they can't cost the amount that they're costing

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- 1 now, and so availing ourselves of a lot of people who
- 2 are interested in the operational need can be one
- 3 great way to be able to move something forward.
- I want to just echo the other thing
- 5 that was stated earlier, I think by Dr. Weinstein,
- 6 about deconvoluting some of the bundles that are out
- 7 there. I think that that's true in two different
- 8 ways. One, when you have completely disparate things
- 9 that go into the bundle, sometimes it's a device plus
- 10 an antiseptic plus something else, those types of head
- 11 of bed, you know, all those things are kind of pretty
- 12 different, but I actually want to talk about also the
- 13 fact that when you do something like decolonization,
- 14 you can attack different body sites.
- 15 So what is that relative proportion of
- 16 value and can we actually measure that, so that we
- 17 understand when you have to have the budget in a
- 18 certain amount, you're going to always go after the
- 19 most effective things first. So I thought that was a
- 20 really thoughtful approach as well.
- 21 MICHAEL CRAIG: Great. Thank you, Dr.
- 22 Huang. And it looks like we have Theresa Michele from

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- 1 FDA. Theresa.
- 2
- 3 one thing that I just wanted to note as we're
- 4 considering these things, another point to consider is
- 5 that we also have to think about the safety of the
- 6 regimens that we're prescribing and that we are, you
- 7 know, considering which was part of the point of the
- 8 limitations in the data that we have for some of these
- 9 agents. And certainly as we develop new agents you
- 10 have to think about that as well.
- 11 Some of the basic science behind it,
- 12 the toxicology studies, making sure that these things
- 13 aren't carcinogenic if you're using them over and over
- 14 and over again or you're exposing, you know, large
- 15 body surfaces. And I thought Dr. Wacher really
- 16 presented this very beautifully when he talked about
- 17 the number needed to treat that you are potentially
- 18 exposing 100 patients to an intervention to prevent
- 19 three infections with C. diff.
- 20 So we have to remember that when we are
- 21 thinking about these preventative therapies safety is
- 22 very paramount because a lot of patients who receive

- 1 them won't receive benefit.
- 2 MICHAEL CRAIG: Thank you. Very good
- 3 point and I think that's a strong consideration for
- 4 how do we address these preventative agents where
- 5 we're talking about benefit to both the individual and
- 6 the group and the application of those. Dr. Jernigan.
- DR. JOHN JERNIGAN: Thanks. And I
- 8 agree with Dr. Michele totally that the safety issues
- 9 are first and foremost. First do no harm. I did want
- 10 to comment on your very last thing about the number
- 11 needed to treat, and again bringing this argument of
- 12 the indirect benefit.
- 13 When you consider the indirect benefit
- 14 of infections -- colonizations and subsequently
- 15 infections prevented through transmission, the number
- 16 needed to treat comes way, way down and one of the
- 17 problems with the number needed to treat for diseases
- 18 like this is it doesn't consider the indirect benefit.
- 19 I think, tried to show some of the modeling data --
- 20 again, they're only models -- but they're
- 21 parameterized based on real world good observational
- 22 data -- suggest the number needed to treat for, for

- 1 example, CRE decolonization to prevent infection, when
- DR. THERESA MICHELE: Thank you. S\(\phi\) 2 you consider the indirect benefit is really much, much
  - 3 lower than that.
  - 4 So I just wanted to make that point to
  - 5 not forget about indirect benefit when we think about
  - 6 these things. I acknowledge that there -- it's
  - 7 challenging to measure and quantify indirect benefit.
  - 8 But I think that's one of the things we need to
  - 9 grapple with because I think the promise of these
  - 10 agents is going to be most of the harm that's going to
  - 11 be prevented I believe will be through indirect
  - 12 benefit more than the direct benefit. Over.
  - 13 MICHAEL CRAIG: Thank you, Dr.
  - 14 Jernigan. I'm going to call on a couple other folks
  - 15 here because I think they had some very interesting
  - 16 and engaging talks that I think this question is
  - 17 particularly important for hearing from them. Dr.
  - 18 Brown with the CF Foundation, what do you think are
  - 19 some of the areas of greatest prioritization and -- in
  - 20 terms of product development here?
  - 21 DR. A. WHITNEY BROWN: Thank you. For
  - 22 our patient population, I think I highlighted that the

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- 1 multidrug resistance, the inherent nature through a
- 2 lifetime of infections and healthcare exposures, so
- 3 really I think the development of new novel
- 4 antibiotics to address MDR and how to entice companies
- 5 when the financial benefit may, you know, may not be
- 6 there because we're not talking about volumes and
- 7 volumes of patients, but to keep our armamentarium
- 8 growing and to do that in a responsible way.
- 9 Of course, we want to reduce our
- 10 antibiotic use as well and I think we've been very
- 11 lucky in our population that that has happened over
- 12 the last couple of years for a confluence of reasons,
- 13 as I said, but being good antibiotic stewards but also
- 14 having the right powerful, appropriate antibiotics
- 15 available for the most vulnerable MDR infections and
- 16 to include looking at bacteriophage therapy as an
- 17 option as well.
- 18 MICHAEL CRAIG: Thank you. And Jim
- 19 Kim, you had a very interesting talk and wanted to see
- 20 what your thoughts are on potential product
- 21 development.
- DR. JAMES KIM: Yeah, thank you. So

1 like we have a hand. Dr. Walker.

- 2 DR. VINCE WACHER: Thanks very much. I
- 3 just wanted to maybe follow up on the indirect benefit
- 4 question or comment, because it's terrific that if we
- 5 can measure the indirect benefit, the number of
- 6 patients in my study goes down. But even if I have to
- 7 cut that number to 2,000 or 1,000, I still have to
- 8 follow them into the community and maybe for a year or
- 9 maybe even two years and then I have to follow who
- 10 they're connected to and who they're connected to
- 11 until I can determine, have I spread antimicrobial
- 12 resistance? Have I spread CDI?
- So it doesn't necessarily change the
- 14 challenge of my study even if the number of people are
- 15 smaller. But I mean clearly the indirect benefit
- 16 getting out in the community, spreading it around,
- 17 going back into hospitals. We had a group from Mexico
- 18 that had to close an entire wing of a hospital forever
- 19 because they could not get it under control, the CDI.
- 20 So you know, the indirect benefit is a
- 21 tremendous potential outcome therapeutically for the
- 22 community. But again, just incorporating that into my

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- 1 from my vantage point, you know, one of the things
- 2 that we're working on, a lot of the healthcare
- 3 efficacy studies for the products that we're working
- 4 on our ASTM methods, so they're validated methods
- 5 using those surrogate endpoints. What I talked about
- 6 today were some of the challenges facing our consumer
- 7 antiseptics and I thought it was just an opportune
- 8 time to review a surrogate endpoint, like
- 9 decolonization.
- This is something that I think will
- 11 take some data to convince FDA that this could be a
- 12 useful end point for the development of products, but
- 13 certainly I think I was very excited to see this
- 14 workshop. I thought that a lot of our work pertains
- 15 to what's going on in this field, and so for me it was
- 16 a great learning experience to see the other talks
- 17 today.
- 18 But I think that's sort of one of the
- 19 areas and I think OTC reform gives us, I think, an
- 20 avenue to talk about what FDA's data requirements are,
- 21 so sort of what I'm looking forward to.
- 22 MICHAEL CRAIG: Thank you. It looks

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- 1 study design gives me another one or two years to
- 2 follow patients in pretty difficult circumstances.
- 3 MICHAEL CRAIG: Thank you. And I think
- 4 Dr. Jernigan is back to discuss the same topic.
- 5 DR. JOHN JERNIGAN: Well, I just want
- 6 to agree with you that one of the challenges we have
- 7 here is that the adverse effect of acquiring
- 8 colonization is sometimes very, very far removed in
- 9 time from the actual acquisition, as you point out,
- 10 maybe years later. So how do we study that? That's
- 11 tough.
- One sort of plug, and this may get into
- 13 study designs and study populations which I know is
- 14 the second topic, Michael, but I want to point out,
- 15 you know, healthcare settings where the lengths of
- 16 stays are very long and where prevalence and
- 17 transmission of some of these pathogens is very high.
- 18 This may not help C. diff much, but I'm thinking of
- 19 CRE, Dr. Henn, et cetera. I mean, you may have
- 20 considered LTACH populations or other long-term care
- 21 populations, again, that have pretty high prevalence,
- 22 pretty high incidence of transmission, pretty high

1 incidence of infection, long length of stay where you

- 2 might be able to enrich capture of those indirect
- 3 benefits. Something to consider. Over.
- 4 MICHAEL CRAIG: Thank you, Dr.
- 5 Jernigan. And Matthew Henn.
- DR. MATTHEW HENN: Yeah, so I'll just
- 7 quickly respond there. I mean, I think it's an
- 8 important point. I think we'll probably get into this
- 9 a little bit in the next question, but it really does
- 10 also important to aging populations and
- 11 (indiscernible) targeting and where you can see the
- 12 outcomes, you need to see (indiscernible) most
- 13 rapidly.
- 14 So you know, at Seres, we focused our
- 15 infection portfolio on immunocompromised patient
- 16 populations and that's where we are focused. That's
- 17 very intentional because we feel we can design trials
- 18 in that setting and get to meaningful potential
- 19 readouts rapidly.
- 20 At the same time, I think there needs
- 21 to, as was brought up earlier today by multiple of our
- 22 CDC colleagues, to really think about other readouts

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- 1 that can be more rapid such as decolonization readouts
- 2 or things of that nature because I think those are
- 3 certainly needed.
- 4 And I think we need -- I can tell you
- 5 as a drug developer we need increased guidance and
- 6 would benefit from increased guidance from the agency
- 7 on how to best think about a decolonization surrogate
- 8 endpoint, particularly for Phase 1 or Phase 2 trials.
- MICHAEL CRAIG: Thank you, Matthew.
- 10 Well, I think we can close out question one but I just
- 11 want to see if there's any other hands and panelists
- 12 who want to talk about our greatest need for product
- 13 development. Bob Weinstein.
- 14 DR. ROBERT WEINSTEIN: Yeah, I think we
- 15 haven't really discussed the community very much, so
- 16 Latania Logan at Rush Children's, when she looked at
- 17 kids coming in the hospital, in a bunch of hospitals
- 18 in Chicago, I think every children's hospital in
- 19 Chicago with resistant organisms, resistant
- 20 Enterobacteriaceae, those were kids from the
- 21 community. They had not been in the hospital ever
- 22 before. So somewhere in the community they acquired

1 this.

- 2 I think there was a Dutch study showing
- 3 that your risk of having fluoroquinolone resistance in
- 4 your gut was greatest if you lived in a community
- 5 where there's a lot of fluoroquinolone use, not you
- 6 necessarily but other people in the community.
- So I think we have to look in the
- 8 community and when we looked at MRSA in some of the
- 9 zip codes in Chicago, we've seen that having been in
- 10 the jail was a risk factor for MRSA in the community.
- 11 So I think we have to look at the extension of some of
- 12 these interventions into communities very specifically
- 13 and focus on the epidemiology in the community to
- 14 understand the spread there. It's not always the
- 15 hospital or the nursing homes.
- 16 MICHAEL CRAIG: Yeah, a very good point
- 17 that when we're talking about transmission here, the
- 18 transmission is certainly not limited to the
- 19 healthcare setting and can go beyond that. Silvia.
- 20 DR. SILVIA CABALLERO: Yeah, something
- 21 that I would add is that having a good understanding
- 22 of the mechanism of action is something that I think

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- 1 we should also think about. So regardless of the
- 2 product in question, right, whether it is antibiotics
- 3 or (indiscernible), I think that knowing how the
- 4 products work will help rationalize failures and
- 5 successes in the clinic, and we need human data for
- 6 that. Preclinical models, mouse models, in vitro
- 7 models, they're great, but we need human data.
- 8 And the other thing that I would add is
- 9 that something else that that would help with is the
- 10 identification biomarkers that will help us select
- 11 patients that would benefit the most (indiscernible)
- 12 products and I don't know if this was mentioned
- 13 already, but also thinking about the microbes that
- 14 we're targeting.
- 15 Some of these organisms may be very
- 16 difficult to decolonize. Even strains within the same
- 17 species, you know, can be difficult to target, so you
- 18 know, spending, you know, more time sort of looking
- 19 into how active these products are preclinically can
- 20 also help us to, you know, develop better products in
- 21 the future.
- 22 MICHAEL CRAIG: And Dr. Elkins from

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Meeting Page 354 1 CDC. 1 Abbo.

2 DR. CHRISTOPHER ELKINS: Well, thanks,

3 Michael. One thing I wanted to bring up and it does

4 develop off of what Silvia's last comment was, but

5 something that Dr. Weinstein brought up which was

6 quorum sensing and I think it's an interesting piece

7 with mechanism of action. So how do we look at it

8 from the microbes perspective?

And I think it hearkens back to a

10 lecture that I attended with Dr. Stuart Levy at one

11 point and you know it straddles both antimicrobial

12 drug development but also how you can apply it in a

13 decolonization sense, so targeting the organism in a

14 much more subtle way. So it does get to the mechanism

15 piece and I think taking that into account with

16 product development is very, very important.

In other words you're not really

18 killing the microbe, you're just inhibiting or, you

19 know, at least with quorum sensing you are able to in

20 effect reduce its ability to colonize and to

21 communicate properly without killing it. So you do

22 have some aspects there on the downstream as far as

2 DR. LILIAN ABBO: Hi again. One of the

3 other areas I think it's important to consider in

4 addition to the community is also the global impact of

5 all of this. We're in Miami and we don't live in an

6 isolated bubble in the United States, and we saw that

7 in COVID, we're seeing it with monkeypox. So I think

8 as we're trying to develop cost effective solutions

9 they need to be scalable to the rest of the world and

10 having effective therapeutics and effective point of

11 care diagnostics would be very helpful.

12 For example, we saw the difference that

13 maybe not 100 percent of the antigen testings work,

14 but if we could have a point of care flow, you know,

15 analytics like a pregnancy test to determine

16 colonization with MDROs, it might be very helpful upon

17 admission because the cost of all of this is adding to

18 our (indiscernible). It's not just the cost of

19 preventing and the cost of treating this multidrug-

20 resistant infections, adds to everything. So anything

21 we can do to prevent and early detection will stop the

22 chain of transmission.

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1 developing resistance, but I think those are keys I

2 think in in developing that and appreciate his

3 comments along those lines as Silvia's as well.

4 MICHAEL CRAIG: Thank you, Chris. More

5 hands up is great. Erin Duffy, CARB-X.

DR. ERIN DUFFY: Yeah, thanks. I just

7 wanted to build on also something Silvia said which is

8 we didn't emphasize much the things that remain not

9 understood in the translation from preclinical to

10 clinical work and this is particularly when a lot of

11 these products are going on top of standard of care.

12 There's a lot of shenanigans. I don't

13 mean that in a negative sense. I think that's a

14 negative word, but there's a lot of stuff that's done

15 to demonstrate, you know, efficacy preclinically

16 including like fractions of a dose of the antibiotic

17 to try to demonstrate an effect that we really have no

18 sense of how that translates clinically.

19 And so I think some dedicated work to

20 understand what's enough to feel confidently moving

21 into patients is really important.

22 MICHAEL CRAIG: Thank you. And Dr. Other things that I think are important

2 for -- especially with cystic fibrosis and other

3 multidrug-resistant gram-negatives is really looking

4 at more effective ways of combining therapeutics,

5 right, whether it's synergy testing through TREK

6 panels and deciding, hey, combination therapy in this

7 situation short course may be more effective than --

8 rather than you know burning each one antibiotic

9 individually.

10 We need more studies looking at that.

11 What are the effective combinations and what's the

12 right duration when we use combination therapy

13 especially for these extreme drug-resistant organisms

14 that are very challenging and in particularly

15 immunocompromised populations which we deal with

16 transplant and oncology in which sometimes it's very

17 hard to restore the immune system and eradicate the

18 colonization or the infection. So that's an area

19 where we need more therapeutics.

20 MICHAEL CRAIG: Absolutely. Thank you.

21 And I think that is actually the time we have allotted

22 for question one, so I'm going to turn it back over to

1 Peter Kim of FDA who's going to take questions two.

2 DR. PETER KIM: Thanks, Michael, and

3 thanks everyone on the panel for the excellent

4 responses.

5 Okay, so question two, please discuss

6 ideas for study designs that could provide evidence of

7 the contribution of a new therapeutic for prevention

8 of healthcare-associated infection on the background

9 of existing infection prevention measures including

10 but not limited to the pros and cons of cluster

11 randomized study designs as well as enrichment

strategies for populations at greatest risk.

13 And we would like to call on Dr. Susan

14 Huang to kick off the response to this question.

15 DR. SUSAN HUANG: Thank you, Peter.

16 So, I'm going to answer in a way that actually I think

17 bridges questions one and two a little bit more in a

18 provocative way. I'll just generally say that there

19 are a large number of options for study designs that

20 could really complement standard randomized controlled

21 trials and I'm just going to name three specific ones

22 that can be really, really helpful when you're trying

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1 to account for contagious outcomes.

So the group designs, which are less

3 commonly discussed, would be the standard cluster

4 randomized design that I talked about, but also to

5 just remember that there are other ways that you can

6 do randomized crossover design. You don't have as

7 many hospitals. As I mentioned, even 20 is a really

8 large trial. You could assign someone to be both a

9 control and a participant in the intervention. They

10 just can't choose when. So that's a randomized

11 process.

12 There's also randomized stepped wedge

13 design. That is, it's really hard to roll out

14 something in a hospital, it takes a lot of phase-in

15 time and so maybe you can only roll it out to ten,

16 which is a lot at one moment, so you have a 40, you

17 know, trial, 40 group trial and so you're going to

18 roll ten at a time, but they can't when.

19 So there's So there's many different

20 ways that you can try to use group designs that can be 20 maybe also open up the idea that there are ways in

21 really, really powerful and still allow for the proper

22 roll-out of these types of designs.

1 I'm going to now switch my comment to

2 hopefully something that's a little more provocative.

3 I'm really interested in how people will respond, but

4 when we think about these designs, I think of two

5 different things about the products we've been talking

6 about. There's the post market indications that don't

7 exist and there's the premarket approvals or

8 indications.

9 And one of the things that's really

10 interesting about, for example, each of us, FDA, CDC,

11 the manufacturers, and then those of us in academia or

12 those of us who actually, you know, run hospitals and

13 hospital infection programs, is we all have really,

14 really important but critically different vantage

15 points.

16 And I will just highlight what Teresa

17 Michele said about, you know, safety. So is there a

18 way to actually, as the next step, take a case

19 example, really do a case study and I'll throw out the

20 example of using chlorhexidine in ICUs for routine

21 bathing. There is no indication for that. There have

22 been many trials on children and adults. It's been

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1 used daily. It is now guidance.

2 So yes, we have no safety that's been

3 submitted to the FDA that's really specific to this,

4 but it's been done in millions of patients every

5 couple of months, millions. And so can we sit down

6 and have the right people at the table to talk about

7 these really complex vantage points because if you're

8 an agency and you're authorizing a safety, you're --

9 you've got a lot of responsibility, you know, compared

10 to a doctor that's saying, you know what, I'm going to

11 try this off label.

12 So I don't want to dismiss anybody's

13 valued perspective, but getting us all at the table to

14 talk about one explicit example can really, really

15 help, and dig into the trials that have been done in

16 hundreds of thousands of patients might be really

17 illustrative and open up the mind of someone like

18 myself when we do the trials about what else can we

19 collect, because that would be really meaningful, but

21 which we can think about stuff that's already

22 happening and try to garner that so we don't have to

Meeting Page 362 Page 364 1 start from square one. 1 cost. 2 2 And similarly for premarket approval, I And I know I'm sounding very mercenary, 3 was just thinking about the same thing. There's lots 3 but honestly this is what's stopping things going 4 forward right now. We've got to find ways that this 4 of things that are not here in the United States. For 5 example, there are antiseptics that have been commonly 5 can be done because otherwise it's not going to get 6 used in other European countries for years. So do we 6 done and it's very sad to hear about Phase 3 trials, 7 have to start the safety discussion at zero? 7 Phase 2 trials that cannot go ahead because of the Is there a way to create some two-9 9 tiered structure that would be understandable and DR. PETER KIM: Thank you, Dr. Wacher. 10 Dr. Weinstein. 10 amenable for everybody to say, you know what, small DR. ROBERT WEINSTEIN: Yes. To expand 11 11 consent studies for safety and then large waived 12 consent studies for population outcome or some small 12 on one of Susan Huang's points, I think that the COVID 13 studies really hard to do that show the connection 13 pandemic really made it clear that we need to have a 14 mechanism for using global data. So studies done in 14 between carriage and infection, and then once that's 15 been shown in a way that's definitive enough, now we 15 other countries of products that we might use here, 16 how do we use that without having to have the full 16 can use a surrogate endpoint. 17 And I think we've got to really put --17 registration data, in a pandemic at least. 18 we've got to get down to real details to talk about 18 The other aspect I think is that if 19 what it really would take to get us to that point. So 19 we're going to understand, we're going to develop 20 more questions than I think an answer. 20 interventions for communities, we have to understand

21 DR. PETER KIM: Thank you, Dr. Huang. 22 I thought I saw a hand up for a moment. Perhaps, Dr.

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1 Duffy? 2 DR. ERIN DUFFY: That was a mistake. 3 DR. PETER KIM:. Okay. Dr. Wacher. DR. VINCE WACHER: So -- yeah, Wacher. 4 5 Perfect, thank you. So the trial design -- and

6 thanks, Dr. Huang, for bringing up sort of premarket 7 and post-market and things like that and to go

8 completely out there, completely out there right now,

9 how would we be able to get our point of care 10 preventative evaluated effectively. And that is if we

11 could be approved to put it on formularies based on

12 safety, and then let the hospitals evaluate this and

13 collect the data over time.

14

So maybe the product is safe enough to 15 be on the formulary. I know that the infection 16 control people will prescribe it. I know physicians 17 will prescribe it if they think it will benefit the

18 patient, but rather than having dedicated efficacy 19 data, maybe we have some signal that encourages

20 efficacy but definitive safety and then we can put it

21 in multiple hospitals and that way get a massive trial 22 that funds itself, even if we were to charge this at

1 example, parents to see where their kids may be

22 think this requires citizen science and enrolling, for

2 picking up resist and bugs. You know, are they

3 picking up on the playgrounds, where are they getting

21 the epidemiology communities which we don't yet and I

4 it.

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5 And so I think we need to think of ways

6 that we can enroll community members to study problems

7 in the community more efficiently than we're doing 8 now. Otherwise we'll never be able to craft community

9 interventions.

10 DR. PETER KIM: Very innovative

11 thoughts. I see a hand up and I'm sorry, I'm going to

12 mispronounce --

13 FLORENCE SEJOURNE: Florence --

15 FLORENCE SEJOURNE: Florence, it's

DR. PETER KIM: -- your last name.

16 okay.

14

17 DR. PETER KIM: Florence, please.

18 FLORENCE SEJOURNE: You can say my

19 first name. Yes, I mean I'm coming back to, you know,

20 following the two last comment, three last comment

21 from Robert and Vince. I'm coming back to Cliff

22 McDonald's question because at the end, I think this

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1

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1 is it. I mean, what would -- I mean based on today's

- 2 workshop where we have heard for the morning sessions
- 3 CDC showing us how much colonization makes sense and
- 4 is associated to risk of infections, and as companies
- 5 developing products where we have trouble showing
- 6 directly the prevention of infection but we could
- 7 definitely show prevention of some biological markers
- 8 and I've shown a few that we have developed at Da
- 9 Volterra.
- 10 So what would be required today to move
- 11 to the next steps in terms of endpoint demonstration
- 12 in association, of course, with safety database.
- DR. PETER KIM: Yeah. I mean, this is
- 14 truly the question of the hour and that's part of --
- 15 I'm sorry go ahead. Go ahead, John.
- 16 DR. JOHN JERNIGAN: So Dan, did you
- 17 want to start or do you want me to make some comments,
- 18 or Peter?
- 19 DR. PETER KIM: I think so --
- 20 DR. JOHN JERNIGAN: I wasn't sure if
- 21 you were going to talk about this one. Okay. So
- 22 here's what I learned today, and I've learned a lot
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- 1 actually from this process because I feel like I've
- 2 been living in COVID-land for two-and-a-half years, as
- 3 do most of you probably.
- 4 So I think that the population and the
- 5 pathogen is important and each situation is going to
- 6 be different in terms of whether use of a surrogate in
- 7 a clinical trial is scientifically supported or
- 8 actually makes sense to a sponsor, you know, in terms
- 9 of feasibility.
- 10 So I think that first of all, you don't
- 11 need necessarily clinical trial data to support the
- 12 clinical benefit of a surrogate, but you do need high
- 13 quality prospective observational data and preferably
- 14 more than one source for folks to talk about, and
- 15 there are a number of processes to come in and begin
- 16 to have those discussions.
- We can do that more globally with
- 18 Cliff's team at CDC. We are happy to do that with
- 19 sponsors under a pre-IND focused on a particular
- 20 product, a particular population, a particular
- 21 pathogen, and talk about, you know, how strong is the
- 22 data.

- I can tell you that most of the
- 2 experience of using either new endpoints or new
- 3 justifications for noninferiority margins largely gets
- 4 driven by development programs and that tends to be
- 5 more efficient than a global qualification process.
- 6 But the first thing to do is be -- is
- 7 someone being willing to put the data together and
- 8 actually have that discussion. That's step one.
- 9 I think there are a fair number of pros
- 10 and cons of considering that as a trial endpoint, and
- 11 I think a lot of that came up in the CARB-X focus
- 12 group that that Erin talked about that, that you could
- 13 see. And none of them actually -- we ended up in the
- 14 scenarios they were discussing talking about other
- 15 than a clinical endpoint. There is the need, unless
- 16 it's a very robust surrogate that can be kind of
- 17 defined as a validated surrogate, going to be the need
- 18 to confirm the clinical benefit, you know, perhaps by
- 19 continuing the trial.
- 20 And I think there's another stakeholder
- 21 at the table these days, which is very important,
- 22 which is payers in terms of what you've demonstrated
  - Page 369

- 1 in your trial and whether or not that product's going
- 2 to be supported either by a formulary committee or by
- 3 payers at that level. So those are just some general
- 4 observations and I would invite others to add.
- 5 DR. PETER KIM: And just to add on to
- 6 what John was saying, we are open to ideas and
- 7 considerations. That's part of why we partnered with
- 8 CDC on this workshop and this is probably the first of
- 9 several conversations. But once again, as John had
- 10 noted, we need someone to come in with a consolidation
- 11 of the evidence for us to evaluate.
- 12 I'll let Dan speak. He has his hand
- 13 up.
- 14 DR. DAN RUBIN: Sure. I had actually
- 15 raised my hand before the surrogate question came up,
- 16 so I don't want to derail us, but just to add a few
- 17 points to this. I mean, I agree with John that
- 18 whether a surrogate is reasonably likely to predict
- 19 clinical benefit can certainly depend on the pathogen,
- 20 the disease, and the intervention. And there are
- 21 definitely hierarchies to the levels of evidence that
- 22 at one level you would need a strong mechanistic

Meeting Page 370 Page 372 1 rationale. 1 up that kind of dollars to actually get that read by 2 Then I guess the next level of endpoint 2 FDA? 3 3 would be a correlate where you've shown that the DR. JOHN JERNIGAN: I can make some 4 surrogate you're trying to reduce is correlated at the 4 comments if you want me to start. So I think we do 5 individual level with the clinical outcome and then 5 have examples where noncommercial sponsors, you know, 6 really the highest form of evidence would be kind of 6 have actually taken drugs through the process. The TV 7 large outcome trials showing that your treatment 7 consortium is one example. 8 effect on the surrogate at the trial level was One of the important points about the 9 associated with the treatment effect on the clinical 9 United States is that we the government can't take the 10 benefit, but how those different forms of evidence are 10 intellectual property of another. And so whoever is 11 weighed in different settings is obviously complex and 11 sponsoring needs a right of reference to the data that 12 it may be hard to get to today. 12 might be important. And that may be the product 13 So I guess the more minor point I 13 quality data, the nonclinical data for the particular 14 molecule in question. And that sometimes is an issue. 14 wanted to raise was just listening to Dr. Huang's 15 presentation one idea I had when she was talking about 15 Just something to keep in mind, but there's nothing 16 kind of the competing interventions in the background 16 barring a consortium from taking, for example, 17 of that trial, that some of the settings we've talked 17 something that's well off patent in for a regulatory 18 about today could be good settings potentially for 18 action, Susan, and we'd absolutely be delighted to 19 platform trial. I think they've shown their worth in 19 work with you, of course. 20 in COVID-19. 20 DR. PETER KIM: And I would --21 21 These are trials where different DR. SUSAN HUANG: Likewise. 22 22 sponsors work together and interventions can come, you DR. PETER KIM: I'm sorry go ahead. Page 371 Page 373 1 know, into the trial in different arms as the study's 1 DR. SUSAN HUANG: No just saying 2 ongoing or if there aren't competing mechanisms, 2 likewise. 3 3 potentially certain types of sectorial randomization DR. PETER KIM: I would just add the --4 can be used, but just kind of thinking about the 4 that probably the best mechanism to facilitate the 5 different interventions and the bundles. This could 5 beginning of the discussion would be a pre-6 be a potential setting for platform trials. Thank 6 investigational new drug application, a pre-IND. That 7 you. 7 way, we can begin the conversation. We can look at DR. PETER KIM: Thanks, Dan. Susan, I 8 submitted data and whatnot and provide some 9 consultative advice. 9 see your hand up. DR. SUSAN HUANG: Yes. I wanted to 10 DR. JOHN JERNIGAN: And for those of

11 just ask, there was a -- someone had mentioned that 12 sometimes the sponsor to FDA of raising to get an 13 indication is not the manufacturer, and I wanted to 14 better understand. 15 Let's say that there was a value for 16 infection prevention. Can an infection prevention 17 society or can CDC come and raise the ability to have 18 something be accepted as an appropriate indication and

19 barring the fact that that might take billions of

20 dollars -- I actually have no idea what that cost is -

21 - but someone raised the fact that it's not always the

22 manufacturer. So who else would be a sponsor and put

11 you unfamiliar, a pre-IND is our way of making sure we 12 don't -- we have access and file the stuff properly 13 that you've submitted and we actually have a process 14 for offering you a meeting. There is no cost for 15 receiving advice through that that program, but then 16 you have a dossier that we're keeping through the 17 development program and eventually if you're ready to 18 move to human trial and need an IND, we can then rely 19 upon that file and it simply becomes an IND file. 20 DR. PETER KIM: Absolutely. I see Dr. 21 Sharon Wright has her hand up. 22 DR. SHARON WRIGHT: Thank you. I just

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- 1 wanted to pivot us back just for a minute to the
- 2 question that came up about population, particularly
- 3 what Drs. Huang and Weinstein were mentioning. You
- 4 know, I think the distinction between community and
- 5 the healthcare setting is becoming increasingly
- 6 blurred.
- 7 And this may be that my newer view
- 8 looking from the health system but as we start moving
- 9 things, particularly complex surgeries into the
- 10 ambulatory setting and then patients going directly
- 11 home afterwards, of things that, you know, some
- 12 patients might have even wound up in a community ICU
- 13 afterwards to recover, and as we look into medical
- 14 home and giving full medical care in patients homes, I
- 15 think thinking about how we design these studies and
- 16 for maybe larger systems that have combined electronic
- 17 health records may be a way to look at that data and
- 18 follow patients through all settings, including things
- 19 we often don't think about like freestanding
- 20 psychiatric facilities where things pass very quickly,
- 21 like summer camp when they are all sharing kitchen
- 22 space and activities together or, you know,

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- 1 immunocompromised units.
- 2 So just taking those things in mind
- 3 when we think about some of the study design and the 3 Jim, for your comment. I'll just ask if Dr. Michele
- 4 populations that are at risk who bring those things
- 5 then back into our tertiary and quaternary care
- 6 setting.
- 7 DR. PETER KIM: Thank you, Dr. Wright.
- 8 I see Dr. Dmitri Iarikov. Would you like to comment? 8 thoughts or questions before we move on to the next
- Dr. DMITRI IARIKOV: I thank everyone.
- 10 A great discussion. Just a few points to add to what
- 11 John and Peter was saying to Dr. Huang's point.
- 12 Please keep in mind that approval of
- 13 the IND, it's not the end of the process. There
- 14 should be an entity responsible for maintaining the
- 15 product, right, so there should be someone to keep
- 16 manufacturing in order, providing stability data,
- 17 providing reports, paying fees.
- So it's not just that -- not, it's 18
- 19 just. It's not only a collection of the data and
- 20 submitting it to the agency. It's just the beginning
- 21 of the process. Over.
- 22 DR. PETER KIM: Very good point,

1 Dmitri. Dr. Kim, would you like to comment?

2 DR. JAMES KIM: Yeah, thank you. I

- 3 guess to build off of Dr. Huang's statements about
- 4 looking at things from all the different vantage
- 5 points, I think that discussion here on new drug
- 6 applications is very interesting and timely subject.
- I also want to sort of, you know, think
- 8 about the way that Dr. Weinstein spoke about the
- 9 different places where you can have interventions.
- 10 And you know, thinking about hand hygiene and the
- 11 importance of hand hygiene, I think Dr. Weinstein
- 12 specified several places where I think proper hand
- 13 hygiene could have a real positive impact on
- 14 decreasing transmission of hospital-associated
- 15 infections.
- 16 So just want to sort of put that on the
- 17 table that, you know, we do have a toolkit here. The
- 18 OTC active ingredients that we use in antiseptics that
- 19 I think could be, you know, expanded in the way that
- 20 they're used or used more effectively. And I think
- 21 that, you know, is something that we should have some
- 22 discussion about also with FDA, thinking about the

- 1 ultimate goal of improving.
- 2 DR. PETER KIM: Thank you. Thank you,
- 4 would like to comment.
- 5 DR. THERESA MICHELE: Nothing further.
- 6 Thanks.
- 7 DR. PETER KIM: Thank you. Any other
- 9 question? I think we are close to time. Dr. Jjingo,
- 10 would you like to go? Would you like to speak?
- 11 DR. CAROLINE JJINGO: Yes. I just
- 12 wanted to say in terms of Dr. Wacher's presentation, I
- 13 think you brought up a lot of important at least I
- 14 think logistical and operational issues which at least
- 15 from the regulatory standpoint, I think it's good for
- 16 us to consider, like -- and also many of speakers in
- 17 terms of the expense of these trials and really I
- 18 think there needs to be probably and I don't know how
- 19 to think of this, but in terms of like funding
- 20 frameworks.
- 21 I don't know -- I mean, I know Dr.
- 22 Farley talked about some consortiums but I don't know

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1 if maybe down the line we might need to think of, I

- 2 don't know, government strategies to try and fund what
- 3 might ultimately be really expensive studies, you
- 4 know, to get the information that we need, especially
- 5 because I think culturally when we look at how our
- 6 healthcare systems, it's usually less proactive in
- 7 terms -- and more reactive. So in terms of when we're
- 8 thinking about things in terms of like prevention,
- 9 where do we get the buy-in to even fund what will
- 10 ultimately seem like it's going to be expensive
- 11 studies?
- 12 And on top of that, the point that you
- 13 said in terms of like with stakeholder buy-ins, if we
- 14 think about hospitals and how I guess several of them
- 15 I guess, you know, based on, you know, being dinged
- 16 for, like, healthcare acquired infections, so how, if
- 17 we're going to think about cluster randomized trials,
- 18 do we get those -- where we're looking at health care
- 19 institutions, be they hospitals or long-term care
- 20 facilities in order to even try and volunteer yourself
- 21 to be a part of a study?
- I mean, somehow it seems like there

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- 1 might be some tension between the fact that you don't
- 2 want to actually have -- you don't want to have
- 3 healthcare-acquired infections, but yet we would need
- 4 their buy-in in order to conduct these studies. So I
- 5 think there are several conundrums, be they funding
- 6 mechanisms and also getting necessary stakeholders to
- 7 even be able to conduct the science that we need to
- 8 answer then these regulatory questions and to fulfill
- 9 the public health and at the individual level patient
- 10 level need that we need to even do this.
- So it's not necessarily the science but
- 12 I think it's the operational logistics that are
- 13 important. So I thank you guys for bringing those up,
- 14 but -- and I don't know the answer.
- DR. PETER KIM: Thank you, Caroline.
- 16 Florence, would you like --
- 17 FLORENCE SEJOURNE: Yes.
- DR. PETER KIM: -- to go?
- 19 FLORENCE SEJOURNE: Yes, I wanted to
- 20 just rapidly reply to Caroline. We had the chance in
- 21 our program to have a co-funding from Europe, from the
- 22 European Commission through IHI. So this issue of

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- 1 logistic was actually not a problem really of money.
- 2 At the end we -- it was a problem of, you know, we
- 3 managed to get regulatory authorization. We managed
- 4 to get some level of funding.
- 5 The thing is the study would last nine
- 6 years. We don't have that time. So why? Because we
- 7 have selected the right patient population which is an
- 8 enrich patient population. I think that's part of the
- 9 question of the designs. However, those are hemato-
- 10 oncology patients and hemato-oncology patient, as we
- 11 well know they take a lot of antibiotics and therefore
- 12 have a very high risk of secondary infection, C. diff
- 13 as well as resistant bacteria and sepsis.
- But guys, when they do clinical
- 15 studies, what they're concentrated in in getting
- 16 treated, their cancer. So the competition in those
- 17 patient population, enrich patient population of
- 18 infectious disease are very difficult to recruit for
- 19 very good reasons which is their own -- their
- 20 physician own priority to get treated, to treat their
- 21 cancer.
- And even though we understand

- 1 microbiome protection is not only about infection but
- 2 as well as immune system towards GvHD, et cetera, et
- 3 cetera. This is still a little bit science fiction
- 4 for physicians so that it's difficult to recruit big
- 5 population in those severe oncology patients because
- 6 we just have as well competition with cures for
- 7 cancer.
- 8 DR. PETER KIM: Thank you, Florence.
- 9 Okay, we'll take Vince as our last comment for this
- 10 question.
- DR. VINCE WACHER: Thanks very much.
- 12 And so first of all, everything Florence said,
- 13 absolutely agree. It took us a year to just get to
- 14 our patients. So it is a tough even in an enriched
- 15 population with a high incidence endpoint like the
- 16 bone marrow transplant population. But I did have an
- 17 idea about how we can force this along. Maybe we
- 18 could talk to CMS and talk to -- about the HSCRP
- 19 program, and you have a choice.
- We will take 1 percent of all your
- 21 Medicare reimbursement or you will have let us do
- 22 clinical trials in your institutions. And that way

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2 opportunity to get to some patients.

3 DR. PETER KIM: Thank you, Vince. And

1 they have a way out of their thing and we have an

4 thank you all for this -- for the responses to the

5 question. It's been really helpful to hear your

6 thoughts.

7 Okay, now the third question. Please

8 discuss clinical endpoints effects on how a patient

9 feels, functions, survives that would be most relevant

10 for evaluating the efficacy of a new therapeutic for

11 the prevention of healthcare-associated infections

12 including but not limited to possible differences and

13 endpoints used in trials randomized at the unit level

14 versus the patient level, defining endpoints for

15 pathogen specific versus broader spectrum therapeutics

16 and handling of dust during the study in endpoint

17 analysis.

18 And we'd like to ask Dr. Vance Fowler

19 to start off with a response to this question. Vance.

DR. VANCE FOWLER: Sure. Thanks Peter.

21 I appreciate the opportunity to participate and

22 learned a great deal from the previous speakers. So

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1 you've got at-risk patients who are not infected at

2 the time of enrollment and you want to see which arm

3 of your trial is best able to keep them that way.

This fundamentally differs from your

5 traditional anti-infective trials in which all of the

6 patients at the beginning have got an infection and

7 the goal is simply to compare the efficacy of two

8 different comparator anti-infective agents and that's

9 going to drive how these trials are designed. It's

10 going to drive how they're interpreted.

So given that, the second thing, I

12 think the primary endpoint in these prevention trials

13 needs to -- wherever possible, needs to be a micro

14 biologically confirmed and blindly adjudicated event.

15 So you know, interventions that target specific

16 pathogens -- and I'm going to largely focus my

17 comments on staph aureus just because it's far and

18 away the most interesting pathogen -- is you know,

19 really should be assessed on its ability to reduce

20 infections that are caused by the pathogen of

21 interest.

I think that in terms of how resistance

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1 yeah, it's a tricky issue, this endpoint thing,

2 because in many ways it's governed in part by the

3 audience to whom you're ultimately designing your

4 trial.

5 And I mean, two sort of broad buckets

6 are strategy trials and registrational trials and

7 unavoidably, because they have fundamentally different

8 goals that are both critical, the audiences of these

9 trials are different. You know, strategy trials are

10 fundamentally about how do we best use the product

11 that we have in our hands. Registration trial is

12 about getting that product into the hands of

13 clinicians at the end of the day.

14 I'm going to focus my comments on

15 registrational trials because that's ultimately why

16 we're all here. Four sort of thoughts on endpoints

17 that can hopefully get things going. You know, the

18 interesting thing about these prevention trials is

19 that the end point in this situation is the event that

20 you don't see and that really permeates the way the

21 trial is interpreted, the way it's designed, and you

22 know, because ultimately you've got a study in which

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1 infuses into that scenario, you know, really in the

2 absence of biological basis, microbiological endpoints

3 should be calculated by including both antibiotic

4 susceptible and antibiotic resistant bacteria. In

5 other words, in this sense, the example, methicillin-

6 susceptible and methicillin-resistant staph aureus,

7 again, unless there's some sort of biological or

8 mechanistic reason to the contrary.

9 Interventions that don't target

10 specific organisms should also be evaluated by micro

11 biologically confirmed events whenever you can. But

12 the problem is in some clinical syndromes, in fact,

13 some big clinical syndromes we have to deal with like

14 hospital-acquired pneumonia, you're almost never going

15 to get a microbiological endpoint, just because of the

16 nature of the disease and I think in that instance,

17 the least bad scenario that we can come up with is

18 going to be a blinded clinical adjudication committee

19 using pre-established guidelines.

20 So that's probably how I would think

21 about tackling that in the particular settings where

22 you're targeting specific pathogen, you're targeting a

1 syndrome, and you're targeting a syndrome without any

2 organism.

3 Quality of life and economic impact, I

- 4 think, should be captured both as secondary endpoints
- 5 but for different reasons. Quality of life, I think,
- 6 should -- would fundamentally fit into the overarching
- 7 mission of you know, evaluating how patients feel,
- 8 function, and survive for obvious reasons. It's
- 9 tricky because you're almost certainly going to need a
- 10 validated syndrome specific quality of life
- 11 instrument.
- 12 I mean, if you look at the OVIVA trial
- 13 published in 2019 in New England Journal, looked at
- 14 oral antibiotics for osteomyelitis, when they looked
- 15 at oral versus IV antibiotics and asked the question,
- 16 does oral antibiotics improve the quality of life of
- 17 patients as compared to IV antibiotics, the answer was
- 18 no. And if you -- you know, I think all of us would
- 19 fundamentally say that's probably not right. And a
- 20 lot of it has to do with the tool instrument in which
- 21 they use to try to answer the question. So you're
- 22 going to have to get specific. They use a thing

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- 1 called the EuroQol-5, which was not really a specific
- 2 to that syndrome.
- 3 Economics are obviously critical, less
- 4 so from the perspective of regulatory but absolutely
- 5 vital for the purposes of, you know, of dealing with
- 6 the third party payers as our other speakers have
- 7 raised.
- 8 And the final point I guess I'd make
- 9 would be, you know, endpoints for interventions that
- 10 reduce rates of infection by reducing bacterial
- 11 colonization, that's tough. We've already heard
- 12 several examples here on this call. You know, I think 12 ORISE fellowship for one, the CTTI, Clinical Trials
- 13 that they're almost certainly going to require hard
- 14 endpoints such as infection until we've got a
- 15 validated surrogate endpoint.
- 16 And we've heard several examples of why
- 17 that's the case, the struggles with it. You know,
- 18 there's staph aureus carriage versus post-operative
- 19 infection. There's the C. difficile scenario. I
- 20 don't see that as being a realistic expectation from
- 21 industry, personally, because I think the cost and the
- 22 time are far beyond the scope of sponsor driven

1 research.

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- 2 I see that as something that's
- 3 ultimately going to fall on the shoulders of
- 4 government, of federal funding, and I think that we
- 5 can try to stimulate appropriate trials looking at
- 6 surrogates through RFAs, targeted RFAs.
- 7 You know, you think about Mike Saag's
- 8 science paper that demonstrated the, you know, the
- 9 role of HIV quantitative viral load as a valid
- 10 surrogate for the use of HIV -- in HIV clinical trials
- 11 and, you know, how do you translate that to the
- 12 scenario of C. diff where, you know, you can colonize
- 13 and not only could you colonize, but then you have to
- 14 express the toxin for it to go -- you know, so it's
- 15 going to be tricky.
- 16 How do you do it? Well, I think that
- 17 for example, you could start, do your RFAs with
- 18 targeting the top five to ten top syndromes that a
- 19 group of experts like Susan Huang and, you know, a
- 20 bunch of others on this call could come up with. Say
- 21 these are the ones we really need to crack. We need
- 22 some sort of system by which to establish, you know,

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- 1 what if, what would -- you know, how are we going to
- 2 trust a surrogate.
- 3 And then, you know, in terms of
- 4 funding, some of the options include, well you know,
- 5 the ORISE fellowship. I can tell you, you know, we're
- 6 doing that right now with some of the members of this
- 7 call using a collaboration between ARLG and the FDA to
- 8 focus on the possible exploration of door endpoints
- 9 for the four most common anti-infective indications,
- 10 and it's just been fabulous. So you know, there's
- 11 precedent in which some of these scenarios such as an
- 13 Transformation Initiative that, you know, Dr. Farley
- 14 and I had the opportunity to work on years ago with
- 15 hospital acquired pneumonia is another, and things of
- 16 that nature.
- 17 So maybe I'll stop there and appreciate
- 18 the opportunity. Thank you.
- 19 DR. PETER KIM: Thanks, Vance. Thank
- 20 you for your thoughts. Very provoking. I'm looking
- 21 for hands. Any takers before I start asking -- we
- 22 have about roughly ten minutes. Dr. Huang, could you

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2 DR. SUSAN HUANG: You know, I think

1 like to comment on any aspect of this question?

3 that my first thought when I see this question is just

- 4 the plethora of studies that you could do because each
- 5 of those things are incredibly important. Of course,
- 6 patient reported outcomes are important. The things
- 7 that drive hospital systems to want to adopt something
- , unat arrive mospital systems to want to adopt sometimes
- 8 and quality improvement is incredibly important. The
- 9 ability to hone in the microbiome as we understand it
- 10 and influence it to prevent disease is critically
- 11 important.
- So I really I think that the answer all
- 13 of us, our first reaction is going to be yes all of
- 14 that matters deeply and how can we -- however how can
- 15 we translate something like a patient reported outcome
- 16 much like the ecological outcomes of an ICU into
- 17 something that can move into an FDA indication.
- And I do think that there is a divide,
- 19 maybe it's a chasm but it was there for a good reason,
- 20 you know, safety really, you know, really defined
- 21 endpoints. There's a reason why the system exists the
- 22 way that we have it. But given the gray spaces that

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- 1 exist with the microbiome and a lot more attention on
- 2 patient desires and interests, this idea of population
- 3 health, which you know, how do you get an indication
- 4 for a population, right, and who governs that
- 5 population and who owns consent for that population?
- 6 Is it public health? Is it the health
- 7 system? Is it -- who is it? I think that if we can
- 8 all agree that there is a new world of conversations
- 9 that needs to be furthered and how we get there and
- 10 how it might change what we have held fast to as the
- 11 dogma of how we conduct studies or approved products
- 12 or, you know, I think that what we're saying through
- 13 all of this is that these things need to shift in some
- 14 way, none of us are certain exactly how, but we need
- 15 to come closer together because there's a lot of
- 16 people who need us and they need these products and
- 17 they need them in a way that can't be decades in the
- 18 making and we don't -- we can't afford it because the
- 19 resistance is growing because of the way we Americans
- 20 use antibiotics.
- 21 And you know, these are, you know,
- 22 first world problems, but they're very, very germane

1 to public health here. So I think it's a great

2 conversation. I hope it's the first of many more.

3 DR. PETER KIM: Thank you. Thank you,

5 DR. TETER KIWI. Thank you. Thank you

4 Dr. Huang. Anyone else? Dr. Jjingo, I see your hand 5 is up.

6 DR. CAROLINE JJINGO: Yeah, hi. I just

7 wanted to ask Dr. Fowler or any of our panelists, but

8 since Dr. Fowler mentioned about quality of life

9 measures or -- like, how would you approach? I mean,

10 how would you approach that? Would it be like, I

11 mean, what kind of, like, instrument would you -- or

12 are there any existing ones or how would you go about

13 that and at what point it seems like it might be --

14 have to address something that's longitudinal or some

15 sustained or early on or -- yeah, I just wanted to

16 hear your thoughts or anyone's thoughts about how it

17 would capture quality of life measures from a patient

18 perspective,

19 DR. VANCE FOWLER: Would someone else

20 like to respond first? Okay, I can comment then. So,

21 you know, as you will -- you doubtless know, they're

22 sort of quality of light -- quality of life that these

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1 instruments that haven't been fully validated by the

2 FDA takes years and years and it's onerous.

3 In no way am I proposing them. There

4 is sort of a middle ground which is being developed

5 and in fact there's a Duke faculty person working, I

6 think the majority of his time at the FDA on quality

7 of life instruments that can be developed in that

8 regard.

9 ARLG is also working on quality of life

10 instruments amongst the, you know, the four anti --

11 primary indications for anti-infectives. And that can

12 be, you know, it's sort of essentially internally

13 validated, largely using -- I know I'm going to get

14 the wording wrong because I -- usually we have to have

14 the wording wrong because 1 -- usually we have to ha

15 a responsible adult with these quality of life guys 16 which -- when we start these trials, but they have

17 essentially validated pods or sections of previous

18 quality of life studies that they can then build in

19 and integrate into a syndrome specific indication.

For example, we're doing it with

21 complicated urinary tract infection. As a matter of

22 fact, we're also as a second trial with the ARLG,

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- 1 we're asking kind of interesting response to that and
- 2 that is, evaluating how well physicians estimate the
- 3 quality of life of their patients. So you're asking
- 4 the quality of life of the patient and then
- 5 simultaneously of those same providers that are
- 6 providing care to them asking the same -- asking their
- 7 expectation and their interpretation of it.
- I can't wait to see what that one is
- 9 going to be, because my guess is we probably don't get 9 in the hospital recently, you value the nurses more
- 10 it quite as well as we think we do. But I think it's
- 11 going to have to as the OVIVA example sort of
- 12 illustrates, I think it's going to have to have some
- 13 specificity of a particular syndrome in place and, you
- 14 know, that can be done with a reasonable price, you
- 15 know, and a reasonable timeline using some of these
- 16 sort of pre-existing validated components. I'll stop
- 17 there.

1 mute.

- 18 DR. PETER KIM: Thanks, Vance. Any
- 19 last minute thoughts? Florence, would you like to
- 20 take the floor?
- 21 FLORENCE SEJOURNE: Sorry --
- 22 DR. PETER KIM: Florence, you're on
  - Page 395
- 2 FLORENCE SEJOURNE: -- muting. Yeah.
- 3 I'm sorry to give a very brief private company
- 4 reaction to the discussions. It's very good that CDC,
- 5 FDA gathered together to put this on the table and
- 6 that we share the info. It's going to be too late for
- 7 some of us, maybe not all, but to bring those products
- 8 to market now. The example of DAV132 is \$18 million
- 9 for 15 years already spent. Five hundred, you know,
- 10 volunteer patients treated with safety, good safety
- 11 database. This takes time. This takes a lot of
- 12 money.
- 13 As you well know, pharma is not really
- 14 interested in that and biotech have trouble
- 15 fundraising. So there is some kind of emergency if we
- 16 want actually the products already kind of available
- 17 and developed today to go to market -- similarly to
- 18 new antibiotics where we know this is an issue and
- 19 CARB-X knows that more than anyone else. Sorry for
- 20 the negative comment in terms of timelines, but that's
- 21 the reality we're into.
- 22 DR. PETER KIM: Thank you, Florence.

- 1 Dr. Weinstein.
- 2 DR. ROBERT WEINSTEIN: Yeah, I think
- 3 the issue of patient reported outcomes is fascinating
- 4 and comparing it to what we think and what the patient
- 5 thinks. I think the other aspect is the nursing
- 6 staff. I don't think we get enough input from the
- 7 nursing staff for interventions and what they think of
- 8 them. And if you've had patients in the -- relatives
- 10 than the doctors. No question about it in my mind.
- 11 You certainly see them a lot more. And
- 12 I think understanding what they think of some of the
- 13 interventions and how they affect their day-to-day
- 14 work, I think would be very useful to incorporate into
- 15 some of the studies we do.
- 16 DR. PETER KIM: Thank you, Dr.
- 17 Weinstein. So, we're at time for this panel
- 18 discussion. What we'll now do is Michael and I will
- 19 split the summary of today's session. So, Michael, I
- 20 turn the floor over to you.
- 21 MICHAEL CRAIG: Thank you, Peter. And
- 22 I want to thank all of our panelists and everyone for

- 1 today. And I think for all of our participants, we
- 2 had, I think at times over 1,000 folks participating
- 3 in the day, so really appreciate everyone's engagement
- 4 and interest in the topic.
- 5 I just want to note from the CDC
- 6 perspective, as I noted at the outset, we're
- 7 incredibly grateful to our colleagues at FDA, John
- 8 Farley and his team for bringing this meeting together
- 9 with us. This is an area of intense interest from
- 10 CDC, as you heard this morning from my presentation as
- 11 well as that of my colleagues, and I think what we
- 12 wanted to highlight was just the challenge that we see
- 13 in public health that I think is growing. And it's
- 14 one that we really do think that there are enormous
- 15 opportunities here for collaboration and I think it's
- 16 collaboration between the public health side, the FDA
- 17 regulatory side, as well as the private sector.
- 18 And I think what you heard this morning
- 19 is, you know, the challenge that we see is the
- 20 transmission of these dangerous pathogens, many of
- 21 them antimicrobial resistant is growing. And how do
- 22 we address that? And the issues of resistance are

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1 only increasing.

2 You heard from Dr. Jernigan talking

3 about that the power of the indirect effect on

4 prevention and what that could potentially hold and

5 some of the modeling that we have seen and that we

6 think is important. You heard from Dr. McDonald

7 talking about agents that are currently available that

8 are being used for some of these purposes already and

9 the positive benefit that we're seeing from many of

10 those and the potential that there could be more,

11 especially as we, you know, potentially could have

12 pathways for some of these products being brought to

13 market.

14 And then you heard from a series of CDC

15 experts, fantastic presentations that delve deeply

16 into the specific pathogen areas. And I'm not going

17 to go over all of them, but I just want to commend all

18 of them for very fantastic, in-depth perspectives that

19 really show the expertise and the data that we have in

20 many of those areas and the potential for what

21 prevention could mean for all of the people who are

22 affected, both in terms of colonization and infection

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1 relationship with you, CDC, Michael, and also with

2 academia and we will continue to work with industry as

3 well.

4 All right, so I'm going to go through a

5 whirlwind of session two. All right. So Heidi Smith

6 discussed Regulatory Considerations for the

7 Registration of Products for the Prevention or

8 Reduction in the Incidence of Healthcare-Associated

9 Infections. She discussed FDA's standards for

10 approval of new products, the characteristics of

11 adequate and well-controlled trials. She provided

12 illustrative examples of possible development programs

13 such as drugs for the prevention of surgical site

14 infections, and also drugs to reduce the incidence of

15 catheter-related bloodstream infections and she

16 discussed safety database considerations.

17 Next, Dr. Theresa Michele's talk was

18 Regulation of Healthcare Antiseptics, and Dr. Michele

19 discussed the categories of over-the-counter

20 antiseptics such as healthcare antiseptics including

21 but not limited to patient preoperative skin

22 preparation. She compared and contrasted pathways for

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1 of those pathogens as well as those who are

2 potentially at risk of those pathogens.

3 And then I would also just really like

4 to highlight and thank our panelists who followed the

5 CDC presenters, both our public commenters as well as

6 those who from -- that shared the patient perspective.

7 I think, you know, we had tremendous presentations

8 about cystic fibrosis and the impacts of a MRSA

9 infection on patients and the ongoing challenges that

10 patients face because of those infections. And I

11 think that they highlighted really, what we all need

12 to remember is what is the patient experience, how can

13 we bring prevention to bear on patients and how can we

14 protect patients ultimately from risk of infection and

15 the risk of transmission.

So that's I think where I would note it

17 and I again want to thank everybody for their

18 participation and Peter, I'll turn it back over to

19 you.

20 DR. PETER KIM: Thanks, Michael, and I

21 would also like to thank everyone involved, all the

22 stakeholders, and thank you for this great working

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1 marketing nonprescription drugs, namely the new drug

2 applications, abbreviated NDA, versus the drug review

3 process through the OTC monograph.

4 She provided an example of the

5 indication and labeling for a patient preoperative

6 skin preparation and described the in vivo and

7 clinical simulation testing for efficacy for a drug

8 product, for patient preoperative skin preparation.

9 Next, Dr. Paul Carlson's talk,

10 Regulatory Considerations for Microbiome Based

11 Therapeutics. Dr. Carlson touched on the

12 investigational new drug application regulations and

13 the additional chemistry, manufacturing, and control

14 considerations for INDs for fecal microbiota

15 transplantation as well as live biotherapeutic

16 products and then discussed some of the challenges and

17 the regulations of FMT such as how to ensure safety

18 and how to characterize the product for consistency of

19 an effectiveness and also discussed and noted that

20 live biotherapeutic products should contain sufficient

21 information to assure the proper identification,

22 quality, purity, and strength of the investigational

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1 drug.

2 Next Dr. Susan Huang. Her talk was

- 3 clinical considerations and operational challenges for
- 4 healthcare-associated infection prevention trials.
- 5 Dr. Huang touched on common features of healthcare-
- 6 associated infection prevention trials such as the
- 7 desire to evaluate a quality improvement strategy,
- 8 determining the group of focus whether it be units or
- 9 hospitals, et cetera, targeting a contagious outcome.
- 10 The trials are spurred by urgent common need and that 10 implementation strategies for pathogen reduction and
- 11 there is limited funds in this space.
- 12 She then discussed common features of
- 13 classical versus pragmatic trials, the differences
- 14 between efficacy and effectiveness trials. She then
- 15 characterized infection prevention populations of
- 16 interest, the importance of defining the question
- 17 under study such as temporary prevention versus long-17
- 18 lasting prevention.
- 19 She also discussed the importance of
- 20 partnership within healthcare system and also had
- 21 considerations for minimal risk trials and waiver of
- 22 consent, the importance of choosing appropriate

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- 1 interference between treatment and that there is
- 2 contamination interference between treatments when
- 3 patients' outcomes are influenced by both the
- 4 treatments they themselves receive and the treatments
- 5 others received.
- Let's see. Dr. Weinstein's talk was
- 7 Controlling Pathogens in Health Care, A Way Forward.
- 8 He noted the model of the causal pathway of spread of
- 9 antimicrobial resistant organisms can help to focus
- 11 healthcare epidemiology. He noted the relative
- 12 importance of the individual components of infection
- 13 control guidelines and bundles should be evaluated and
- 14 the studies of microbiome should assess mechanisms
- 15 behind the creation of the fecal patina and explore
- 16 the interrelations of different microbiome components.
  - Dr. James Kim, his talk was OTC topical
- 18 antiseptics, an opportunity to bring innovative
- 19 decolonization products to market. He provided
- 20 background information on the American Cleaning
- 21 Institute, discussed topical skin antiseptics and the
- 22 regulation of these products, noting that current

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- 1 controls, discussed analysis approaches such as
- 2 difference-in-differences approach, the need for
- 3 accounting for contagious outcomes.
- 4 She discussed the differences between
- 5 the conduct of the CLEAR trial and the REDUCE MRSA
- 6 trial and some lessons learned and she delineated
- 7 special considerations for what may be considered
- 8 minimal risk indication.
- In conclusion, she noted that a wide
- 10 variety of trials with varying durations may be
- 11 pursued and once you consider the value of group
- 12 versus individual randomization, ensure sufficient
- 13 sample size for balancing confounders and assessing
- 14 outcomes, ensure obtaining the best possible controls
- 15 for gold standard comparison, and ensure data for as-
- randomized analysis when groups drop out. 16
- 17 Next, we had Dr. Ed Bein, statistical
- 18 considerations related to cluster randomized trials.
- 19 Dr. Bein noted that the use of a cluster randomized
- 20 trial is appropriate when evaluating treatments and
- 21 intended to be administered cluster-wide and that CRTs
- 22 are intended to handle within cluster contamination

- 1 regulatory frameworks may pose a barrier to the
- 2 development of innovative topical skin antiseptics and
- 3 noted that the establishment of skin decolonization
- 4 and pathogen reduction as a determinant of clinical
- 5 outcomes would facilitate new skin antiseptic
- 6 development.
- 7 Nicholas Georges' talk was Development
- 8 of Efficacious Cleaning and Disinfecting Products in
- 9 Healthcare Settings. He discussed the differences
- 10 between disinfectants, sanitizers, sterilants, and
- 11 cleaning products. He noted that testing is dependent
- 12 on the claims and the surface types to be treated
- 13 which results in determining which agency regulates
- 14 the product in question. And he touched on how one
- 15 might select the product for a particular use.
- 16 Dr. Erin Duffy's talk was
- 17 Considerations in the Development of Nontraditional
- 18 Therapeutics, a CARB-X Perspective. She provided an
- 19 overview of the CARB-X program as well as their
- 20 portfolio of treatment and prevention products. Dr.
- 21 Duffy discussed takeaways from her recent
- 22 decolonization workshop including but not limited to

Meeting August 30, 2022 Page 406 Page 408 1 thoughts on potential patient populations for studying 1 and discussed development programs for SER-109 in 2 decolonization strategies. 2 patients with recurrent CDI. 3 3 She also noted that there are several And then we also heard from our 4 panelists on three questions and we had a rather 4 challenges and opportunities for decolonization 5 strategies and a coordinated approach would be 5 provocative conversations and a lot of take home from 6 beneficial. 6 the discussion. Florence Sejourne. Her talk was So once again, thank you very much for 8 Challenges and Lessons Learned Developing DAV132, a 8 everyone's participation, everyone who made this 9 Novel Therapy Protecting Gut Microbiota from 9 workshop possible. We hope this is the first of 10 several discussions. I would like to thank our 10 Antibiotic-Induced Dysbiosis. She discussed how 11 antibiotics provoke intestinal microbiota dysbiosis 11 partners CDC as well as academia and industry and the 12 and how dysbiosis may result in additional downstream 12 patient groups as well who provided valuable 13 consequences. She discussed the DAV132 development 13 information related to their experiences. 14 14 program and lessons learned. She noted the Michael, I think you want to -- why 15 association between low diversity microbiota and the 15 don't you go ahead. 16 risk of CDI as well as the risk of colonization with 16 MICHAEL CRAIG: Yeah, Peter. I just 17 multidrug-resistant organism. 17 wanted to close by noting, folks, that we have been 18 18 recording today and it is going to be posted on the She noted that current regulations do 19 not allow for feasible clinical development because of 19 registration page for folks to see and it's also going 20 the demonstration of reduction in colonization 20 to be on CDC's YouTube page and those will be 21 followed by reduction secondary infections and 21 available and thanks for pulling up the post-webinar 22 information. 22 dissemination necessitates large, expensive trial. Page 407 Page 409 Next, Dr. Vince Wacher. His talk was If you have questions you can email us 2 Lessons Learned in Developing SYN-004, a Potential 2 at ARX@CDC.gov and we'll get back to you with that. 3 Point of Care Preventative for HA-CDI. He discussed 3 And I also want to close by thanking the planning and 4 the development program for SYN-004 for the proposed 4 logistics teams, Katie, Sunita, Amy, all the other 5 indication of prevention of CDI. He also proposed 5 folks who have been behind the scenes who have pulled 6 ways to help facilitate CDI prophylactic drug 6 this together and we've been working on this for about 7 development. 7 a year, so really appreciate everyone's great work on 8 Dr. Silvia Caballero. Her talk was 8 it. There's a lot of work that happened behind the 9 Defined Bacterial Consortia, a Novel Approach to 9 scenes that folks didn't see. So thank you all and I 10 Tackle Healthcare-Associated Infections. She noted 10 think with that we can close for today. Thanks, all. 11 that microbiota and metabolic alterations 11 Bye bye. 12 characterized colonization and infection with C. 12 DR. PETER KIM: Thank you, everyone. 13 difficile and MDRO. She discussed development 13 (Whereupon, at 5:22 p.m., the proceeding was concluded.)

14 programs for VE303 and VE707 bacterial consortia for 14 15 15 either decolonization or preventing CDI and MDR 16 Enterobacteriaceae. 16 17 And finally, Matthew Henn. His talk 17 18 was Microbiome Therapeutics to Potentially Transform 18 19 the Management of Antimicrobial-Resistant Infection. 19 20 He noted that encapsulated consortia of commensal 20 21 bacteria may be designed to establish colonization 21 22 22 resistance and target inflammatory and immune pathways

## Page 410 1 CERTIFICATE OF NOTARY PUBLIC 2 I, JANEL FOLSOM, the officer before whom the 3 foregoing proceedings were taken, do hereby certify 4 that any witness(es) in the foregoing proceedings, 5 prior to testifying, were duly sworn; that the 6 proceedings were recorded by me and thereafter reduced 7 to typewriting by a qualified transcriptionist; that 8 said digital audio recording of said proceedings are a 9 true and accurate record to the best of my knowledge, 10 skills, and ability; that I am neither counsel for, 11 related to, nor employed by any of the parties to the 12 action in which this was taken; and, further, that I 13 am not a relative or employee of any counsel or 14 attorney employed by the parties hereto, nor 15 financially or otherwise interested in the outcome of 16 this action. 17 garel B. Falsom 19 JANEL FOLSOM Notary Public in and for the 20 DISTRICT OF COLUMBIA 21 22 Page 411 1 CERTIFICATE OF TRANSCRIBER 2 I, SONYA LEDANSKI HYDE, do hereby certify 3 that this transcript was prepared from the digital 4 audio recording of the foregoing proceeding, that said 5 transcript is a true and accurate record of the 6 proceedings to the best of my knowledge, skills, and 7 ability; that I am neither counsel for, related to, 8 nor employed by any of the parties to the action in 9 which this was taken; and, further, that I am not a 10 relative or employee of any counsel or attorney 11 employed by the parties hereto, nor financially or 12 otherwise interested in the outcome of this action. 13 14 Sonya M. dedarki Hyd-15 SONYA LEDANSKI HYDE 16 17 18 19 20 21 22

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