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Guidelines on Clinical Evaluation of Vaccines: Regulatory Expectations

Proposed revision of WHO TRS 924, Annex 1

NOTE:

This document has been prepared for the purpose of inviting comments and suggestions on the proposals contained therein, which will then be considered by the Expert Committee on Biological Standardization (ECBS). Publication of this early draft is to provide information about the proposed *Guidelines on Clinical Evaluation of Vaccines: Regulatory Expectations*, to a broad audience and to improve transparency of the consultation process.

The text in its present form does not necessarily represent an agreed formulation of the Expert Committee. **Written comments proposing modifications to this text MUST be received by 15th March 2016 in the Comment Form available separately** and should be addressed to the World Health Organization, 1211 Geneva 27, Switzerland, attention: Department of Essential Medicines and Health Products (EMP). Comments may also be submitted electronically to the Responsible Officer: **Dr Ivana Knezevic** at email: knezevici@who.int.

The outcome of the deliberations of the Expert Committee on Biological Standardization will be published in the WHO Technical Report Series. The final agreed formulation of the document will be edited to be in conformity with the "WHO style guide" (WHO/IMD/PUB/04.1).

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53

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159 **1. Introduction**

160

161 This guideline is intended to replace *WHO Technical Report, Series No. 924, Annex 1 Guidelines*
162 *on clinical evaluation of vaccines: Regulatory Expectations*, which was adopted by the Expert
163 Committee on Biological Standardization (ECBS) in 2001 (1). This document of 2001 has
164 served as a basis for setting or updating national requirements for the evaluation and licensing of
165 a broad range of vaccines as well as for WHO vaccine prequalification.

166

167 Following on the establishment of the document of 2001, more than 20 vaccine-specific
168 documents that include a section on clinical evaluation have been adopted by the ECBS, all of
169 which are intended to be read in conjunction with TRS 924, Annex 1 (2). These include
170 documents that address polio vaccines [OPV, IPV], whole cell pertussis and acellular pertussis
171 vaccines, meningococcal conjugate vaccines for serotypes A and C, pneumococcal conjugate
172 vaccines and vaccines intended to prevent diseases due to rotaviruses, dengue viruses, human
173 papillomaviruses and malaria parasites.

174

175 This guideline has been prepared to reflect the scientific and regulatory experience that has been
176 gained from vaccine clinical development programs since the adoption of the above mentioned
177 version in 2001. Many challenging issues surrounding appropriate and feasible vaccine clinical
178 development programs for specific types of vaccines have arisen in the intervening period. For
179 example, there has been increasing recognition of the potential need to base initial licensure of
180 certain vaccines on safety and immunogenicity data only (i.e. it is not feasible to generate pre-
181 licensure efficacy data) and in the absence of an established immunological correlate of
182 protection (ICP).

183

184 This guideline is intended for use by national regulatory authorities (NRAs), companies
185 developing and holding licences for vaccines, clinical researchers and investigators. It considers
186 the variable content of clinical development programs, clinical trial designs, the interpretation of
187 trial results and post-licensing activities. The content of the various sections is intended to assist
188 in the preparation and approval of clinical trial applications, applications for initial licensure and

189 applications to support post-licensure changes as well as to provide guidance on post-licensure
190 activities, such as pharmacovigilance and estimation of vaccine effectiveness.

191

192 The main changes (modification or expansion of previous text and additional issues covered) in
193 this revision compared to the above mentioned version of TRS No. 924, Annex 1, 2001 (1)
194 include, but are not limited to, the following:

195

196 *Immunogenicity*

- 197 • General principles for comparative immunogenicity studies, including selection of the
198 comparators, endpoints and acceptance criteria for concluding non-inferiority or
199 superiority of immune responses
- 200 • Situations in which age de-escalation studies may be inappropriate
- 201 • Assessing the need for and timing of post-primary doses
- 202 • Using different vaccines for priming and boosting
- 203 • Assessing the ability of vaccines to elicit immune memory or to cause hypo-
204 responsiveness
- 205 • Using immunogenicity data to predict vaccine efficacy, with or without bridging to
206 efficacy data
- 207 • The derivation and uses of immunological ICPs
- 208 • Vaccination of pregnant women to protect them and/or their infants

209

210 *Efficacy*

- 211 • Role and potential value of human challenge studies
- 212 • Need for and feasibility of conducting vaccine efficacy studies
- 213 • Selection of appropriate control groups in different circumstances
- 214 • Comparing extended with parent versions of vaccines
- 215 • Predicting vaccine efficacy when there is no ICP and vaccine efficacy studies are not
216 feasible
- 217 • Preliminary and confirmatory vaccine efficacy studies and their design
- 218 • Vaccines with modest efficacy and/or that provide a short duration of protection

- 219 • Extrapolating data between geographic/genetically diverse populations
220 • Role of sponsors and public health authorities in generating vaccine effectiveness data
221

222 *Safety*

- 223 • Detailed consideration of the collection and analysis of safety data from clinical trials
224 • Consideration of size of the pre-licensure database by type of vaccine and its novelty
225 • Consideration of the safety database by population sub-group
226 • Special safety considerations by vaccine construct
227 • Circumstances of limited safety data pre-licensure
228 • Use of vaccine registries and disease registries
229 • Particular issues for vaccine pharmacovigilance activities
230

231 Due to the fact that a separate document on nonclinical evaluation of vaccines was established
232 in 2003 (3), the section on that topic in the 2001 version has been removed. Furthermore, the
233 structure of the document has changed. In particular, a number of methodological
234 considerations have now been incorporated into relevant sections and subsections rather than
235 being described in a separate section. In line with the changes made in the document, the
236 Glossary and References have been updated.

237

238 The WHO has also made available several other guidelines of relevance to clinical development
239 programs for vaccines. These should be consulted as appropriate and include:

- 240 • Good clinical practice for trials on pharmaceutical products (4)
241 • Good manufacturing practice for pharmaceutical preparations (5)
242 • Good manufacturing practice for biological products (6)
243 • Guidelines on nonclinical evaluation of vaccines (3)
244 • Guidelines on nonclinical evaluation of vaccine adjuvants and adjuvanted vaccines (7)
245 • Guidelines on procedures and data requirements for changes to approved vaccines (8)
246 • Guidelines for independent lot release of vaccines by regulatory authorities (9)
247 • Recommendations for the evaluation of animal cell cultures as substrates for the
248 manufacture of biological medicinal products and for the characterization of cell banks (10)

- 249 • Clinical Considerations for Evaluation of Vaccines for Prequalification (11)
250 • The WHO manual *Immunization in practice* (12)
251 • WHO expert consultation on the use of placebos in vaccine trials (13)
252

253 Furthermore, guidance on various aspects of pre-licensure clinical development programs for
254 vaccines and post-licensure assessment is also available from several other bodies, such as the
255 International Conference on Harmonization (ICH), the European Medicines Agency (EMA), the
256 United States Food and Drug Administration (FDA) and the United Kingdom Medical Research
257 Council (MRC). These WHO guidelines are not intended to conflict with, but rather to
258 complement, these other documents.

259

260 **2. Scope**

261

262 This guideline considers clinical development programmes for vaccines that are intended to
263 prevent infectious diseases in humans by eliciting protective immune responses that are
264 sufficient to prevent clinically apparent infections. It includes vaccines that may be given before
265 exposure or shortly after known or presumed exposure to an infectious agent to prevent onset of
266 clinical disease. Protective immune responses may be directed against one or more specific
267 antigenic components of micro-organisms or against substances produced and secreted by them
268 (e.g. toxins) that are responsible for clinical disease.

269

270 The guideline is applicable to vaccines which contain one of more of the following:

- 271 • Microorganisms that have been inactivated by chemical and/or physical means
272 • Live microorganisms that have been rendered avirulent in humans as a result of attenuation
273 processes or specific genetic modification
274 • Antigenic substances that have been derived from micro-organisms. These may be purified
275 from micro-organisms and used in their natural state or may be modified (e.g. detoxified by
276 chemical or physical means, aggregated or polymerized).
277 • Antigens that have been manufactured by synthetic processes or produced by live organisms
278 using recombinant DNA technology.

- 279 • Antigens (however manufactured) that have been chemically conjugated to a carrier
280 molecule to modify the interaction of the antigen with the host immune system.
- 281 • Antigens that are expressed by another micro-organism which itself does not cause clinical
282 disease but acts as a live vector (e.g. live viral vectored vaccines, live attenuated chimeric
283 vaccines).

284 In addition, although naked DNA vaccines are not specifically discussed in this guideline the
285 principles and development programs outlined are broadly applicable.

286

287 This guideline does not apply to:

- 288 • Therapeutic vaccines (i.e. used for treatment of disease)
- 289 • Vaccines intended for any purpose other than prevention of infectious diseases and the
290 consequences of infectious diseases.

291

292 3. Glossary

293

294 The definitions given below apply to the terms used in this guideline. They may have different
295 meanings in other contexts.

296

297 *Adverse event (AE)*

298 Any untoward medical occurrence in a trial subject. An AE does not necessarily have a causal
299 relationship with the vaccine.

300

301 *Adverse event following immunization (AEFI)*

302 Any untoward medical occurrence that follows immunization using a licensed vaccine outside of
303 a clinical trial setting. An AEFI does not necessarily have a causal relationship with the use of
304 the vaccine. The AEFI may be any unfavourable or unintended sign, abnormal laboratory
305 finding, symptom or disease.

306

307 *Attack rate*

308 The proportion of the population exposed to an infectious agent who become (clinically) ill.

309

310 *Blinding*

311 A procedure in which one or more parties involved in a clinical trial are kept unaware of the
312 treatment assignment(s). Double blinding refers to the vaccinees/care-givers, investigator(s) and
313 sponsor staff being unaware of the treatment assignment during the conduct of the trial and at
314 least until after completion of the primary analysis.

315

316 *Booster dose*

317 A dose that is given at a certain time interval after completion of the primary series that is
318 intended to boost immunity to, and therefore prolong protection against, the disease that is to be
319 prevented.

320

321 *Case ascertainment*

322 The method adopted in a trial of vaccine efficacy for detecting cases of the infectious disease
323 intended to be prevented by vaccination.

324

325 *Case definition*

326 The pre-defined clinical and laboratory criteria that must be fulfilled to confirm a case of a
327 clinically manifest infectious disease in a study of vaccine efficacy or effectiveness.

328

329 *Clinical trial application*

330 An application submitted to a NRA by a sponsor for the purposes of gaining authorization to
331 conduct a clinical trial of an investigational or licensed vaccine at a trial site within the NRA's
332 jurisdiction. The contents and format of the application will vary as required by the relevant
333 NRA(s).

334

335 *Cluster randomization*

336 Randomization of subjects into a clinical trial by group (e.g. by households or communities) as
337 opposed to randomization of the individual subject.

338

339 *Geometric mean concentration*

340 The average antibody concentration for a group of subjects calculated by multiplying all values

341 and taking the n th root of this number, where n is the number of subjects.

342

343 *Geometric mean titre*

344 The average antibody titre for a group of subjects calculated by multiplying all values and taking
345 the n th root of this number, where n is the number of subjects.

346

347 *Good clinical practice (GCP)*

348 GCP is a process that incorporates established ethical and scientific quality standards for the
349 design, conduct, recording and reporting of clinical research involving the participation of
350 human subjects. Compliance with GCP provides public assurance that the rights, safety, and
351 well-being of research subjects are protected and respected, consistent with the principles
352 enunciated in the Declaration of Helsinki and other internationally recognized ethical guidelines,
353 and ensures the integrity of clinical research data.

354

355 *Good manufacturing practice (GMP)*

356 GMP is the aspect of quality assurance that ensures that medicinal products are consistently
357 produced and controlled to the quality standards appropriate to their intended use and as required
358 by the product specification.

359

360 *Immunological correlate of protection (ICP)*

361 An Immunological Correlate of Protection (ICP) is most commonly defined as a type and
362 amount of immunological response that correlates with vaccine-induced protection against a
363 clinically apparent infectious disease and is considered predictive of clinical efficacy. For
364 some types of vaccines the ICP may be the type and amount of immunological response that
365 correlates with vaccine-induced protection against infection (e.g. hepatitis A and B vaccines).
366 The ICP may be mechanistic (i.e. causative for protection, such as antibody that effects virus
367 neutralization or serum bactericidal antibody) or it may be non-mechanistic (i.e. non-causative,
368 an immune response that is present in those protected by vaccination, but not the cause of
369 protection (such as serum IgG against VZV in the context of prevention of herpes zoster).

370

371 *Immune memory*

372 An immunological phenomenon in which the primary contact between the host immune system
373 and an antigen results in a T-cell-dependent immune response, often referred to as priming of the
374 immune system. Effective priming results in development of memory B-cells and an anamnestic
375 immune response to post-primary doses, which are commonly referred to as booster doses.

376

377 *Immunogenicity*

378 The capacity of a vaccine to elicit a measurable immune response.

379

380 *Non-inferiority trial*

381 In the context of vaccine clinical development programs, non-inferiority trials may have the
382 primary objective of showing that the immune response(s) to one or more specific antigenic
383 components in a candidate vaccine are not inferior to immune responses to corresponding
384 antigenic components in a licensed vaccine. Alternatively, the primary objective may be to
385 demonstrate that a candidate vaccine has non-inferior efficacy to a licensed vaccine.

386

387 *Pharmacovigilance*

388 A practice of detecting, assessing, understanding, responding to and preventing adverse drug
389 reactions, including reactions to vaccines, in the post-licensure period.

390

391 *Posology*

392 The vaccine posology for a specific route of administration and target population includes:

- 393 • The dose content and volume delivered per dose
- 394 • The dose regimen (i.e. the number of doses to be given in the primary series and, if
395 applicable, after the primary series)
- 396 • Dose schedule (i.e. the dose intervals to be adhered to within the primary series and between
397 the primary series and any further doses)

398

399 *Post-licensure safety surveillance*

400 A system for monitoring AEFIs in the post-licensure period.

401

402 *Post-primary doses*

403 Additional doses of vaccine given after some time interval following the primary series of
404 vaccination, which may or may not boost the immune response.

405

406 *Primary vaccination*

407 First vaccination or series of vaccinations intended to establish clinical protection.

408

409 *Protocol*

410 A document that states the background, rationale and objectives of the clinical trial and describes
411 its designs, methodology and organization, including statistical considerations and the conditions
412 under which it is to be performed and managed. The protocol should be signed and dated by the
413 investigator, the institution involved and the sponsor.

414

415 *Randomization*

416 In its simplest form, randomization is a process by which n individuals are assigned to a test (n_T)
417 or control (n_C) treatment so that all possible groups of size $n = n_T + n_C$ have equal probability of
418 occurring. Thus, randomization avoids systematic bias in the assignment of treatment.

419

420 *Responder*

421 A vaccinee who develops an immune response (humoral or cellular) that meets or exceeds a pre-
422 defined threshold value using a specific assay. This term is most often used when there is no ICP
423 and when the clinical relevance of achieving or exceeding the pre-defined response is unknown.

424

425 *Responder rate*

426 The responder rate is the percentage of vaccinees achieving or exceeding the pre-defined level of
427 response.

428

429 *Serious adverse event (SAE) or serious AEFI (SAEFI)*

430 An adverse event is serious when it results in death, admission to hospital, prolongation of a
431 hospital stay, persistent or significant disability or incapacity, is otherwise life-threatening or
432 results in a congenital abnormality/birth defect. SAEs are such events that occur during clinical
433 trials. SAEFIs are such events that occur during post-licensure safety surveillance.

434

435 *Seroconversion*

436 A predefined increase in antibody concentration or titre. In subjects with no measurable antibody
437 prior to vaccination seroconversion is usually defined as achieving a measurable antibody level
438 post-vaccination. In subjects with measurable antibody prior to vaccination seroconversion is
439 commonly defined by a pre-defined fold-increase from pre- to post-vaccination. The definitions
440 may be adjusted depending on whether the lower limit of detection of the assay is or is not the
441 same as the lower limit of quantification.

442

443 *Sponsor*

444 The individual, company, institution or organization that takes responsibility for the initiation,
445 management and conduct of a clinical trial. The entity acting as a sponsor for a clinical trial is
446 usually the same as that which applies for clinical trial approval. The sponsor of a clinical trial
447 may not be the entity that applies for a license to place the same product on the market and/or the
448 entity that holds the license (i.e. is responsible for post-licensing safety reporting) in any one
449 jurisdiction.

450

451 *Superiority trial*

452 A trial with the primary objective of demonstrating that the immune response to one or more
453 antigenic components in a group that receives a candidate vaccine is superior to the
454 corresponding immune response in a control group.

455

456 *Vaccine efficacy*

457 An estimate of the reduction in the chance or odds of developing clinical disease after
458 vaccination relative to the chance or odds when not vaccinated against the disease to be
459 prevented. Vaccine efficacy measures direct protection (i.e. protection induced by vaccination in
460 the vaccinated population sample).

461

462 *Vaccine effectiveness*

463 An estimate of the protection conferred by vaccination in a specified population that measures
464 both direct and indirect protection (i.e. the estimate may reflect in part protection of non-

465 vaccinated persons secondary to the effect of the vaccine in the vaccinated population).

466

467 *Vaccine vector*

468 A vaccine vector is a genetically engineered micro-organism (which may be replication
469 competent or incompetent) that expresses one or more foreign antigen(s) (i.e. antigens derived
470 from a different micro-organism).

471

472

473 **4. Vaccine Clinical Development Programs**

474

475 This Section considers:

- 476 ➤ Important considerations for clinical programs, including:
- 477 - Consultations with regulatory authorities
 - 478 - Use of independent data review committees
 - 479 - Registering and reporting clinical trials
- 480 ➤ Typical clinical development programs for new candidate vaccines, including:
- 481 - Main objectives of the clinical development program
 - 482 - Factors that determine the extent and content of the program
 - 483 - Stages of typical development programs
 - 484 - Programs that do and do not include vaccine efficacy trials
 - 485 - Alternatives for estimation of vaccine efficacy
- 486 ➤ Clinical evaluation trials after initial licensure

487

488 **4.1 General considerations**

489

490 For a new candidate vaccine the main objective of the clinical development program is to
491 accumulate adequate data to support initial licensure and appropriate use, as described in
492 Subsection 4.2. The essential elements of the program are:

- 493 • To describe the interaction between the vaccine and the host immune response (Section 5)
- 494 • To identify safe and effective dose regimens and schedules (Sections 5 and 6)
- 495 • To provide estimates of vaccine efficacy by directly measuring efficacy or inferring efficacy

496 based on immune responses (Sections 5 and 6)

497 • To describe the safety profile (Section 7)

498 • To assess co-administration with other vaccines if this will be essential for use (Section 5)

499

500 After initial licensure, as described in Subsection 4.3:

501 • It is essential to monitor vaccine safety in routine use (Section 7).

502 • It is commonly appropriate to estimate vaccine effectiveness (Section 6)

503 • Depending on the content of the pre-licensure program, further trials of safety,
504 immunogenicity and/or efficacy may be conducted and the data may be used to extend or
505 otherwise modify the use of the vaccine via amendment of the prescribing information.

506

507 4.1.1 Consultation with National Regulatory Authorities (NRAs)

508

509 It is strongly recommended that dialogue with the appropriate NRAs occurs at regular intervals
510 during the pre-licensure clinical development program to agree on the content and extent of the
511 initial application dossier. This is especially important when:

512 a. The clinical program proposes a novel approach to any aspect of development for which
513 there is no precedent or guidance available

514 b. The proposed program conflicts with existing guidance to which the NRAs involved would
515 usually refer when considering the suitability of the program

516 c. There are particular difficulties foreseen in providing evidence to support an expectation of
517 vaccine efficacy (i.e. there is no immunological correlate of protection and a vaccine
518 efficacy study is not feasible)

519 d. There are other special considerations for the total content of the pre-licensure program. For
520 example, when it is necessary to use different vaccine constructs for priming and boosting to
521 achieve immune responses thought likely to be protective. In this case each constitutes a
522 separate vaccine but the clinical data required to support their licensure for use in tandem is
523 less than would be required for two vaccines intended to be used completely independently.

524

525 Further dialogue should ensue whenever additional clinical trials are planned with intent to
526 modify the prescribing information. In addition, it should be considered whether changes to the

527 manufacturing process of a vaccine before or after initial licensure need to be discussed with
528 NRAs to establish whether or not specific clinical trials are required to support the changes.
529 Consultation with NRAs is also essential when issues of vaccine safety or effectiveness arise in
530 the post-licensure period to determine any actions that are needed.

531

532 4.1.2 Use of independent data monitoring committees

533

534 It is common in vaccine trials that a data safety monitoring board (DSMB) is appointed to
535 provide independent ongoing assessments of safety data. In the pre-licensure program for a new
536 candidate vaccine it may be appropriate to have a DSMB in place even for the initial exploratory
537 trials and dose-finding trials, especially if the vaccine consists of a new construct and/or when it
538 may be anticipated that it could be very reactogenic. For other vaccines it may be considered
539 useful to have a DSMB in place if available data from the same or similar vaccines point to the
540 possibility of important safety issues or if the trial will enrol particular populations (e.g. infants
541 and toddlers, pregnant women or immunocompromised subjects). A DSMB may not be
542 considered necessary for trials with vaccines that include only established antigenic components
543 and adjuvants for which no particular safety problems are anticipated or when a licensed vaccine
544 is being investigated using an alternative posology or in a new population. If the DSMB charter
545 includes recommending that trials are terminated early for safety reasons there should be
546 appropriate stopping rules in place.

547

548 In vaccine efficacy trials it may also be appropriate to appoint an independent data adjudication
549 committee consisting of individuals with expertise relevant to the infectious disease to be
550 prevented. For example, such a group could be used to provide an independent review of the
551 eligibility of individual vaccinees for inclusion in the primary analysis population and/or to
552 identify cases of clinically apparent infections that meet the pre-defined case definition. If such a
553 committee is appointed to oversee one or more trials the protocol and statistical analysis plan
554 should clarify whether the conclusions of the adjudication committee will be used to conduct the
555 primary analysis and any secondary analyses that are pre-defined.

556

557 In some situations, it may be appropriate to appoint an independent data monitoring committee

558 to review the results of pre-planned interim analyses of safety and/or efficacy data when a certain
559 proportion of the intended sample size has reached a certain stage of participation. It may be
560 appropriate that the DSMB or some other independent data monitoring committee takes on this
561 responsibility. Protocols and statistical analysis plans may define futility criteria to be applied to
562 the results of one or more interim analyses that, if met, would result in a recommendation from
563 the independent committee to terminate the trial. Whenever an interim analysis is planned, expert
564 statistical input should be obtained to ensure that appropriate adjustments are made to protect the
565 power and integrity of the trial.

566

567 4.1.3 Registering and reporting clinical trials

568

569 Before any clinical trial is initiated (i.e. before the first subject receives the first medical
570 intervention in the trial) its details must be registered in a publicly available, free to access,
571 searchable clinical trial registry. The registry should comply with individual NRA requirements
572 and as a minimum should comply with the WHO international agreed standards.

573

574 The entry into the clinical trial registry site should be updated as necessary to include final
575 enrolment numbers achieved and the date of actual study completion (i.e. the last data collection
576 time point for the last subject for the primary outcome measure). If clinical trials are terminated
577 prematurely the entry should be updated to reflect this with a report of the numbers enrolled up
578 to the point of termination.

579

580 The key outcomes of a clinical trial must be posted in the results section of the entry in the
581 clinical trial registry within 12 months of study completion and/or posted on a publicly-available,
582 free-to-access, searchable website (e.g. that of the trial sponsor or Principal Investigator).

583

584 Each NRA may have specific requirements for reporting the results of completed trials and the
585 status of ongoing clinical trials conducted with a specific product within and without their
586 jurisdiction. Whatever these requirements, each regulatory submission (whether for clinical trial
587 approval, to support initial licensure or a post-licensure modification or to provide a product
588 safety update report) should include a listing of all completed and ongoing trials conducted with

589 the product by the sponsor. It is recommended that any trials that are known to the sponsor (e.g.
590 from searching registries or from publications) that were initiated by persons other than the
591 sponsor (e.g. by a public health body or academic institution or by another company that used
592 the product as a comparator) should also be listed.

593

594 **4.2 New candidate vaccines**

595

596 Examples of new candidate vaccines from the regulatory standpoint include:

- 597 i. Vaccines that contain only new antigenic components (i.e. not previously used in
598 licensed vaccines)
- 599 ii. Vaccines that contain both new (i.e. not in any licensed vaccine) and known (i.e. already
600 in licensed vaccines) antigenic components
- 601 iii. Vaccines that contain a new adjuvant, with known and/or new antigenic components
- 602 iv. Vaccines that contain only known antigenic components that have not previously been
603 combined all together into a single vaccine, with or without a known adjuvant
- 604 v. Vaccines that contain only known antigenic components \pm known adjuvants in a
605 combination that is already licensed but the vaccine is produced by a different
606 manufacturer. This includes situations in which seed lots or bulk antigenic components
607 used to make a licensed vaccine are supplied to other manufacturers for their own vaccine
608 production.

609

610 For new candidate vaccines the content and extent of pre-licensure clinical development
611 programs will reflect how much is already known about the antigenic components and adjuvants
612 in the product. Some of the most important factors include:

- 613 a. Number of the antigenic components (e.g. from the same or from several infectious
614 organisms)
- 615 b. Nature of the antigenic components (e.g. manufactured with or without genetic
616 modification, live attenuated, live vectored)
- 617 c. Inclusion of an adjuvant
- 618 d. Disease(s) to be prevented
- 619 e. The available options for predicting vaccine efficacy (e.g. inferring efficacy based on

- 620 established immunological correlates of protection or conducting vaccine efficacy trials)
- 621 f. Age range and population for use (e.g. infants, elderly, pregnant women)
- 622 g. Route of administration
- 623 h. Likelihood of co-administration with other vaccines in routine use
- 624 i. Vaccine-specific safety issues that may be anticipated

625

626 4.2.1 Safety and immunogenicity trials

627

628 The safety and immunogenicity of a new candidate vaccine should be evaluated in all pre-
629 licensure clinical trials. In the earliest stage of clinical development the primary objective of a
630 trial is usually to describe safety although immunogenicity data are also collected. In later trials
631 the primary objective is usually to address specific immunogenicity issues and the assessment of
632 safety may be a co-primary or secondary objective. In vaccine efficacy trials evaluations of
633 safety and immunogenicity are usually secondary objectives (see Subsection 4.2).

634

635 4.2.1.1 Initial trials

636

637 These are commonly referred to as Phase 1 trials.

638

639 The clinical program for new candidate vaccines commences with an exploration of safety and
640 of the interaction between the antigens proposed for inclusion in the candidate vaccine and the
641 human immune system. In most cases the first clinical trials are conducted in healthy young
642 adults before proceeding to conduct trials in other age groups and/or in subjects with underlying
643 conditions. Depending on the perceived benefit and risks of vaccination it may not be
644 appropriate or necessary to apply an age de-escalation approach (e.g. to move from adults to
645 adolescents, then to children aged 6-12 followed by younger children, toddlers and finally
646 infants) to sequential trials or groups within trials. For example, if a vaccine has negligible
647 potential benefit for older children it may be acceptable in some cases to proceed from trials in
648 adults to trials in infants and toddlers.

649

650 It is usual that these trials explore different doses of antigenic components and, if applicable, the

651 effect of adding an adjuvant in various amounts. For vaccines that contain more than one new
652 antigenic component the first trials may evaluate each one given alone before selecting possible
653 doses for use in combinations. When new antigenic components are to be added to a licensed
654 product the immune response to separate administrations and to the proposed combination
655 product are compared. For vaccines that contain only known antigenic components and
656 adjuvants the initial trials focus on the effects of combining them into a single formulation or the
657 effects of mixing immediately prior to injection (e.g. using a liquid formulation of some
658 component to reconstitute a lyophilized presentation of the others). Depending on the initial
659 results, sequential trials may explore formulations with adjusted amounts of one or more
660 antigenic components and/or the adjuvant.

661

662 *4.2.1.2 Further trials*

663

664 These are commonly referred to as Phase 2 trials.

665

666 Further safety and immunogenicity trials are conducted to build on the Phase 1 trial results. In
667 most cases these trials are conducted in subjects who are representative of the intended target
668 population for the vaccine at the time of initial licensure.

669

670 These trials are usually designed to provide sufficient immunogenicity data to support selection
671 of one or more candidate formulations for further trial i.e. to select the amounts of antigenic
672 components and, where applicable, adjuvants in each dose. They may provide adequate data to
673 determine the number of doses and dose intervals but the final vaccine posology is sometimes
674 established only after completion of confirmatory immunogenicity trials or vaccine efficacy
675 trials.

676

677 *4.2.1.3 Confirmatory (or pivotal) trials*

678

679 In many vaccine clinical development programs the confirmatory (or pivotal) trial(s) involve an
680 estimate of vaccine efficacy as described in Subsection 4.2.2.

681

682 In instances where vaccine efficacy trials do not need to be, or cannot be, conducted (see
683 Subsection 4.2.2), the confirmatory (or pivotal) trial(s) usually assess the immunogenicity of the
684 final selected vaccine formulation and posology in each target population. In this setting, they
685 are commonly referred to as Phase 3 safety and immunogenicity trials. It is usual that the
686 investigational formulations used in these confirmatory safety and immunogenicity trials (as well
687 as in confirmatory efficacy trials; see below) should be manufactured using validated processes
688 and should undergo lot release in the same way as intended for the commercial product.

689

690 4.2.2 Efficacy trials

691

692 Vaccine efficacy trials have the primary aim of evaluating the protective efficacy of a candidate
693 vaccine against an infectious disease. The immunogenicity data collected during vaccine efficacy
694 trials can be used to evaluate the relationship between immune parameters and efficacy and may
695 enable identification of immune correlates of protection (see Subsection 5.4). These trials also
696 provide an opportunity to collect extensive safety data using the final intended formulation and
697 dose regimen in the target population.

698

699 Preliminary vaccine efficacy trials may be conducted to explore the magnitude of protection that
700 may be possible and to inform the design of confirmatory vaccine efficacy trials (e.g. by
701 evaluating efficacy of different dose regimens and/or by estimating efficacy based on a range of
702 efficacy variables). If conducted, these are commonly referred to as Phase 2b trials. They are also
703 sometimes referred to as pilot efficacy trials or proof of concept efficacy trials.

704

705 Confirmatory vaccine efficacy trials that are designed and powered to provide statistically robust
706 estimates of vaccine efficacy are commonly referred to as Phase 3 (or pivotal) efficacy trials or
707 sometimes as field efficacy trials.

708

709 The need for and feasibility of evaluating the protective efficacy of a candidate vaccine should
710 be considered at an early stage of vaccine development because the conclusion will determine
711 the overall content of the pre-licensure clinical program and impact on its duration. In all
712 application dossiers that do not include an evaluation of vaccine efficacy the sponsor should

713 provide a sound justification for the lack of such data, taking into account the following:

714

715 a) Efficacy data are not required

716

717 Vaccine efficacy trials are not necessary if it is established that clinical immunological data can
718 be used to predict protection against disease. For example, when there is an established
719 immunological correlate for protection against a specific disease (e.g. anti-toxin levels against
720 diphtheria and tetanus toxins, antibody against hepatitis B surface antigen) the candidate vaccine
721 should be shown to elicit satisfactory responses based on the relevant correlate(s).

722

723 b) Efficacy data are usually required

724

725 Vaccine efficacy trials are usually required whenever a candidate vaccine is developed with
726 intent to protect against an infectious disease and one or more of the following apply:

727 • There is no established immunological correlate of protection that could be used to predict
728 the efficacy of the candidate vaccine.

729 • There is no existing licensed vaccine of documented efficacy against a specific infectious
730 disease to allow for immunobridging of a candidate vaccine to the efficacy of a licensed
731 vaccine.

732 • Immunobridging to the documented efficacy of a licensed vaccine against a specific
733 infectious disease is not considered to be possible because there is no known relationship
734 between specific immune response parameters and efficacy.

735 • There are sound scientific reasons to expect that vaccine efficacy cannot be extrapolated
736 from the population(s) included in the prior efficacy trial(s) with a candidate vaccine to one
737 or more other populations.

738 • There are sound scientific reasons to expect that vaccine efficacy that has been demonstrated
739 for the candidate vaccine against infectious disease due to specific strains (e.g. serotypes,
740 sub-types) cannot be extrapolated to other strains.

741

742 c) Efficacy data cannot be provided

743

744 In some instances in which efficacy data are usually required it may not be feasible to conduct
745 efficacy trials. For example, if the candidate vaccine is intended to prevent an infectious disease
746 that:

- 747 ○ Does not currently occur (e.g. smallpox)
- 748 ○ Occurs in unpredictable and short-lived outbreaks that do not allow enough time for the
749 conduct of appropriately designed trials to provide a robust estimation of vaccine efficacy
750 (e.g. some viral haemorrhagic fevers)
- 751 ○ Occurs at a rate that is too low for vaccine efficacy to be evaluated in a reasonably sized trial
752 population and period of time. This situation may apply:
 - 753 a. Due to natural rarity (e.g. plague, anthrax, meningitis due to *N. meningitidis* type B) of
754 the infectious disease
 - 755 b. Due to rarity of the infectious disease resulting from the widespread use of effective
756 vaccines. In this case the numbers required to conduct an adequately powered analysis
757 of the relative efficacy of a candidate vaccine vs. a licensed vaccine may be too large to
758 permit completion in any reasonable timeframe.
 - 759 c. When the aim is to evaluate vaccine efficacy against serotypes or subtypes of an
760 organism that occur rarely (e.g. pneumococcal conjugate vaccines and human
761 papillomavirus vaccines).

762

763 If it is not feasible to perform vaccine efficacy trials and there is no immunological correlate of
764 protection, it may be possible to support an assumption of the likely efficacy of a vaccine by
765 deriving a marker of protection from one or more of the following:

- 766 i) Nonclinical efficacy trials
- 767 ii) Passive protection trials (i.e. effects of normal or hyper-immune human gamma
768 globulin, use of convalescent sera) that may point to the sufficiency of humoral
769 immunity for prevention of clinical disease and suggest a minimum protective antibody
770 level that could be used as a benchmark in clinical trials with candidate vaccines
- 771 iii) Trials of the acquisition of natural immunity that may support an approach as in ii)
- 772 iv) Human challenge trials
- 773 v) Comparison of immunological responses with those seen in past trials of similar
774 vaccines with proven protective efficacy (e.g. acellular pertussis vaccines) even though

775 the relationship between immune responses to one or more antigenic components and
776 efficacy remains unknown

777

778 4.2.3 Pivotal safety trials

779

780 Safety is an important secondary endpoint in all trials with the primary objective of assessing
781 immunogenicity or efficacy. In rare cases, the assessment of safety may be the primary or co-
782 primary objective in a pre-licensure Phase 3 (pivotal trial) that has immunogenicity and/or
783 efficacy as secondary objectives, as described in Subsection 7.2.3.

784

785 **4.3 Post-licensure clinical evaluations**

786

787 For all licensed vaccines safety data are collected as part of routine pharmacovigilance. On
788 occasion, additional pharmacovigilance in the form of trials designed to address specific safety
789 issues that were identified as potential concerns from pre-licensure trials may be conducted
790 post-licensure (see Section 7).

791

792 Whether or not vaccine efficacy trials were conducted prior to initial licensure it is usual to
793 evaluate vaccine effectiveness during routine use or by means of trials specifically designed to
794 provide estimates of effectiveness (see Subsection 6.3).

795

796 Further clinical trials are commonly conducted after first licensure and are sometimes performed
797 to address commitments made to NRAs. These trials may or may not be intended to support
798 modifications of the prescribing information and may include:

799 a. Extension phases of trials that commenced before first licensure (e.g. to continue follow-up
800 of safety, efficacy and/or immune response, to evaluate the effects of further doses)

801 b. Trials that evaluate the use of alternative dose regimens (e.g. reducing the number of doses)
802 and/or schedules (e.g. extending the interval between doses)

803 c. Trials in additional populations (e.g. different age groups, populations with factors that
804 could affect their immune response, such as pregnancy, prematurity and
805 immunosuppression)

806 d. Trials to support changes in vaccine manufacture with potential to affect safety, efficacy or
807 immune response

808 e. Trials to support co-administration with other vaccines

809

810 The nomenclature for these types of trial is variable. If these additional trials are conducted in
811 wholly new populations or with substantially different vaccination regimens, especially when
812 they are intended to provide support for changes to the prescribing information, they are
813 commonly referred to as Phase 2 or 3 trials. Trials that are intended to support more minor
814 changes, such as adding alternative dose regimens or extending the age range, are commonly
815 referred to as Phase 3b trials. Other types of post-licensure trials, such as those in which vaccines
816 are given in accordance with licensed uses and regimens, are more often referred to as Phase 4
817 trials. These include trials that are specifically designed to address specific safety issues or to
818 estimate vaccine effectiveness.

819

820 5. Immunogenicity

821

822 This Section considers:

823 ➤ The range of immunogenicity data that may be collected throughout the pre- and post-
824 licensure clinical development program

825 ➤ Collection of specimens for immunogenicity trials

826 ➤ Characterization of the immune response to a new candidate vaccine

827 ➤ Selection of the immune parameters to be measured

828 ➤ Assays for measuring humoral and cellular immune responses

829 ➤ Identification and uses of immunological correlates of protection

830 ➤ Objectives and designs of immunogenicity trials

831 ➤ Considerations for some specific types of immunogenicity trials, including:

832 - Trials to identify formulations and posologies (primary and post-primary)

833 - Comparative immunogenicity trials to bridge efficacy

834 - Trials to extend or modify use

835 - Co-administration trials

836 - Trials in which pregnant women are vaccinated

- | | | |
|-----|---|--|
| 837 | - | Trials to support major changes to the manufacturing process |
| 838 | - | Lot to lot consistency trials |

839

840 **5.1 General considerations**

841

842 Immunogenicity trials are conducted at all stages of pre-licensure vaccine development and
843 additional trials are commonly conducted in the post-licensure period. In all trials the evaluation
844 of immune responses rests on the collection of adequate specimens at appropriate time intervals
845 and measurement of immune parameters most relevant to the vaccine using validated assays.

846

847 In the clinical development program for new candidate vaccines that contain micro-organisms
848 or antigens not previously included in human vaccines immunogenicity trials should provide a
849 detailed understanding of the immune response to vaccination. Subsequent pre-licensure and
850 post-licensure clinical trials commonly evaluate and compare immune responses between trial
851 groups to address a range of objectives. Depending on the objectives, stage of development and
852 trial population the comparisons may be made with one or more of placebo, other formulations
853 or regimens of the same vaccine or licensed vaccines. In these trials the assessments and
854 analyses of the immune responses are primary objectives whereas the assessments of safety
855 may be co-primary or secondary objectives. In trials that are primarily intended to estimate
856 vaccine efficacy, assessment of the immune responses is usually a secondary objective but it is
857 important that data on immune responses are collected to support analyses of the relationship
858 between immunogenicity and efficacy, which may lead to identification of immunological
859 correlates of protection.

860

861 **5.2 Characterization of the immune response**

862

863 For micro-organisms and antigens that have not been used previously in human vaccines a
864 thorough investigation of their interaction with the human immune response should be conducted
865 as part of the overall clinical development program. For micro-organisms and antigens that are
866 already in licensed vaccines it is not usually necessary to repeat these types of investigations but
867 consideration should be given to conducting at least some trials in certain circumstances (e.g.

868 when a new adjuvant is to be added to known antigens, a different method of attenuation is used,
869 a different carrier protein is used for antigen conjugation or an antigen previously obtained by
870 purification from cultures is to be manufactured using recombinant technology).

871

872 The range of investigations conducted should take into account what is known about the immune
873 response that results from natural exposure and whether or not this provides partial or complete
874 protection that is temporary or lifelong. The range of investigations should also consider the
875 characteristics of the infecting micro-organism (e.g. whether there are multiple subtypes that
876 cause human disease) and the content of the vaccine (14). Investigations may include some or all
877 of the following:

- 878 • Determination of the amount, class, sub-class and function of antibody elicited by the
879 vaccine
- 880 • Description of the magnitude of the humoral and cell-mediated immune response to initial
881 and sequential doses and changes in the magnitude of responses with time elapsed since
882 vaccination
- 883 • Assessment of the ability of the vaccine to elicit a T-cell dependent primary immune
884 response, with induction of immune memory (i.e. priming of the immune system) giving rise
885 to anamnestic responses i) on natural exposure ii) after further doses of the same vaccine
886 and/or iii) after further doses of a vaccine that contains closely related but non-identical
887 micro-organisms or antigens (i.e. cross-priming)
- 888 • Assessment of the specificity and cross-reactivity of the immune response
- 889 • Assessment of changes in antibody avidity with sequential doses, which may be useful when
890 investigating priming
- 891 • Evaluation of factors that could influence the immune responses (e.g. presence of maternal
892 antibody, pre-existing immunity to the same or very similar organisms, natural or vaccine-
893 elicited antibody against a live viral vector)

894

895 **5.3 Measuring the immune response**

896

897 **5.3.1 Collection of specimens**

898

899 Immune responses to vaccination are routinely measured in serum (humoral immune responses)
900 and blood (cellular immune responses). For some vaccines it may be of interest to explore
901 immune responses in other body fluids that are relevant to the site at which the target micro-
902 organism infects and/or replicates (e.g. in nasal washes or cervical mucus), especially if it is
903 known or suspected that the systemic immune response does not show a strong correlation with
904 protective efficacy for the type of vaccine under trial (e.g. intranasal vaccination against
905 influenza). Nevertheless, to date specimens other than sera have not provided data that have been
906 pivotal in regulatory decision making processes and have not resulted in identification of ICPs.
907 Therefore the rest of this section focuses on the collection of sera.

908
909 Pre-vaccination samples should be collected from all subjects in the early immunogenicity trials
910 after which it may be justifiable to omit these samples or to obtain them from subsets (e.g. if the
911 initial trials indicate that antibody is rarely detectable or quantifiable prior to vaccination in the
912 target population). Pre-vaccination sampling remains essential if it is expected that the target
913 population will have some degree of pre-existing immunity either due to natural exposure and/or
914 their vaccination history since the assessment of the immune response will need to take into
915 account seroconversion rates and increments in geometric mean titres or concentrations from
916 pre- to post-vaccination. Pre-vaccination sampling is also necessary if it is known or suspected
917 that pre-existing immune status may have a positive (e.g. because pre-existing antibody reflects
918 past priming) or negative (e.g. due to maternal antibody interfering with primary vaccination
919 with certain antigens in infants) impact on the magnitude of the immune response to vaccination.

920
921 The timing of post-vaccination sampling should be based on what is already known about the
922 peak immune response and antibody decay curve after initial and, if applicable, sequential doses
923 (e.g. for vaccines that elicit priming the rise in antibody after a booster dose is usually much
924 more rapid compared to earlier doses). For antigens not previously used in human vaccines
925 sampling times may be based initially on nonclinical data and then adjusted when antibody
926 kinetic data specific to the antigen(s) under trial have been generated. As information is
927 accumulated the number and volume of samples taken from individual vaccinees may be reduced
928 to the minimum considered necessary to address the trial objectives.

929

930 5.3.2 Immunological parameters

931

932 Immunological parameters are measures that describe the humoral (e.g. antibody concentrations
933 or antibody titres depending on the assay output) or the cell-mediated (e.g. percentages of
934 sensitised T-cells) immune response. To date, immunological parameters other than those that
935 measure the humoral immune response have not played a pivotal or major role in vaccine
936 licensure so that the focus is usually on determination of antibody levels.

937 • For known micro-organisms or antigens in a candidate vaccine the range of parameters to be
938 measured in clinical trials is usually selected from prior experience and whether or not there
939 is an established ICP.

940 • For micro-organisms or antigens not previously included in human vaccines the selection of
941 parameters to be measured should take into account what is known about natural immunity.
942 For some infectious diseases the nature of the immune response to infection in animal
943 models may also be useful for parameter selection. In later clinical trials, after
944 characterization of the immune response, the parameters to be measured may be modified.

945

946 5.3.2.1 Humoral immune response

947

948 The humoral immune response is assessed from the post-vaccination appearance or increase
949 from pre-vaccination in antibody directed at specific micro-organisms or antigens in the vaccine.

950 • Most weight is usually placed on functional antibody responses (e.g. serum bactericidal
951 antibody [SBA], toxin or virus neutralizing antibody, opsonophagocytic antibody [OPA])
952 but there may not be an appropriate assay available (e.g. for typhoid vaccines based on the
953 Vi polysaccharide) or the only available assays may have low feasibility for application to
954 large numbers of samples (e.g. because they are very labor intensive or require high-level
955 biocontainment facilities).

956 • Alternatively, or in addition to the determination of functional antibody, the immune
957 response may be assessed by measuring total antibody (e.g. total IgG measured by ELISA)
958 that binds to selected antigens (or, on occasion, to specific epitopes). Only a proportion of
959 the total antibody detected may be functional.

960

961 The following should be taken into consideration when deciding how to measure the humoral
962 immune response:

- 963 a. If a strong correlation has already been established between total and functional antibody
964 responses to a specific micro-organism or antigen it may be acceptable to measure only total
965 IgG in further trials (e.g. antibody to tetanus toxin)
- 966 b. For antigens for which there is an established ICP it may suffice to measure only the
967 relevant functional antibody (e.g. SBA for meningococcal vaccines) or total IgG (e.g. for
968 antibody to tetanus toxin) response
- 969 c. If the ICP is based on total IgG there may be instances in which there is still merit in
970 measuring functional antibody (e.g. for antibody to diphtheria toxin for which a micro-
971 neutralization assay is available)
- 972 d. If there is no ICP the functional antibody response should be measured if this is feasible
- 973 e. Occasionally there may be more than one immunological parameter that measures functional
974 antibody but one is considered to be a more definitive measure than the other (e.g.
975 neutralizing antibody to influenza virus vs. antibody that inhibits haemagglutination), in
976 which case the more definitive parameter may be determined at least in a subset
- 977 f. For some vaccines against certain viruses there is a potential that some of the total antibody
978 detected has no protective effect (e.g. is non-neutralizing) but it could enhance cellular
979 infection by wild-type virus and result in an increased risk of severe disease after
980 vaccination (e.g. this may apply to dengue vaccines). To assess this possibility the routine
981 measurement of total antibody to assess the humoral immune response to vaccination should
982 be supported by other detailed investigations.

983

984 *5.3.2.2 Cell-mediated immune response*

985

986 For some types of infectious disease (such as tuberculosis) the assessment of the cell-mediated
987 immune response may have a major role in the assessment of the interaction between the
988 vaccine and the human immune system. In many other settings the evaluation of the cellular
989 immune response may serve to support the findings based on the humoral immune response
990 (e.g. when assessing the benefit of adding an adjuvant or when evaluating the degree of cross-
991 priming elicited by a vaccine).

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The cell-mediated immune response is most commonly assessed by detecting and quantifying sensitized T-cells in blood from vaccinees. These investigations may also serve to characterize the predominant cytokines released and to detect differences in sensitization between T-cell sub-populations. There are several methods that may be used. These are commonly based on measuring the production of a range of cytokines following in-vitro stimulation of T-cells with individual or pooled antigens.

To date, the methodologies used for these and alternative types of assays have been variable and non-standardized. Nevertheless, the results may provide useful comparisons between treatment groups within any one study (e.g. could describe the effect, if any, of an adjuvant) based on comparing rates of “responders” defined by a magnitude of change in the assay readout from pre- to post-vaccination. If there are marked discrepancies in the patterns of responses observed between cell-mediated and humoral responses (e.g. if adding an adjuvant does have a major effect on antibody levels but does not increase the percentages of sensitized cells in one or more T-cell subsets) the findings should be carefully considered and discussed.

5.3.3 Assays

Assays of functional or total antibody that are used to report immune responses to vaccination (whether to the candidate vaccine or to co-administered vaccines) in trials intended to support licensure (i.e. in confirmatory trials) may be:

- Commercially available assays specifically designed and intended for quantification of antibody that are considered acceptable to NRAs (i.e. have been marketed following a robust regulatory review by the same or by other NRAs).
- In-house assays that have been validated according to similar principles recommended for quantitative lot release assays in the ICH Q2 (R1) document *Validation of Analytical Procedures: Text and Methodology* (15). In-house assays that are used in early trials that explore the immune response may be regarded as an exception and may report data using assays that have yet to be validated or which are not subsequently validated.
- In-house assays that have been shown to be comparable to a reference assay (e.g. to an assay

1023 established in a WHO reference laboratory or to an assay that is established in a recognized
1024 public health laboratory and which has been used previously to support clinical trials that
1025 have been pivotal for licensure).

1026 In each case, it is expected that WHO International Standard reagents will be used in assay runs
1027 if these exist or omission of their use should be adequately justified.

1028

1029 Commercial assays suitable for quantification of the cell-mediated response to vaccination are
1030 not currently available but may be used in future. In-house assays that are used to detect and
1031 quantify cell-mediated immunity may be difficult to fully validate, in which case the results
1032 should not be used to make specific claims regarding clinical effect.

1033

1034 Clinical trial protocols should specify which assays will be used and in which laboratories.
1035 Clinical trial reports should include at least a summary of the assay methodology and its
1036 commercial or other validation status. For in-house assays the validation reports should be
1037 provided.

1038

1039 It is preferable that the same assays are used in the same laboratories throughout the clinical
1040 development program (including pre-and post-licensure trials) for an individual vaccine. It is
1041 also preferable that each assay (whether it measures the response to the candidate vaccine or to a
1042 concomitant vaccine) is run by one central laboratory. If this is not possible (e.g. because
1043 different laboratories have to be used, commercial or in-house assays change over time or a
1044 switch is made between in-house and commercial assays) the new and original assays should be
1045 shown to be comparable. As a minimum it is recommended that a selection of stored sera (e.g.
1046 covering a range of low to high results when using the previous assay) are re-run using the
1047 previous and new assays in parallel. The number of sera re-tested should be sufficient to support
1048 a statistical assessment of inter-assay variability.

1049

1050 The micro-organisms (e.g. in assays of SBA, OPA and virus neutralization) and the antigens
1051 (e.g. in ELISAs and for in-vitro stimulation of sensitized T-cells) used in the assay may affect
1052 both the result and the interpretation of the result. For example:

1053 • It is important to use purified antigen to avoid the possibility that the assay detects and

1054 measures antibody to any extraneous antigenic substances that may be in the vaccine.

1055 • For vaccines that contain antigens from multiple strains of the same species (e.g. multiple
1056 bacterial capsular types) separate assays are needed to determine the immune response to
1057 each antigen.

1058 • Although it is usually acceptable to conduct routine testing using the same micro-organisms
1059 or antigens present in the vaccine it may be very informative to perform additional testing, at
1060 least in subsets of samples, using circulating wild-type organisms or antigens derived from
1061 them in the assay. It is not expected that these additional assays will necessarily be validated
1062 since they are exploratory in nature. The results of additional testing can provide an
1063 indication as to whether the results of routine testing could represent an over-estimate of the
1064 immune response to circulating strains. This additional testing can also provide an
1065 assessment of the cross-reactivity of the immune responses elicited by the vaccine to other
1066 organisms of the same genus or species (e.g. to different flaviviruses, to different clades of
1067 influenza virus or to different HPV types) and guide the need to replace or add strains or
1068 antigens in a vaccine to improve or maintain its protective effect.

1069

1070 **5.4 Identification and use of immunological correlates of protection**

1071

1072 5.4.1 Immunological correlates of protection and their uses

1073

1074 To date, all established ICPs are based on humoral immune response parameters that measure
1075 functional or total IgG antibody. Examples of well-established ICPs include those for antibody
1076 to diphtheria and tetanus toxoids, polioviruses, hepatitis B virus and *H. influenzae* type b (Hib)
1077 polysaccharide (PRP) (16). In most cases, established ICPs have been shown to correlate with
1078 prevention of clinically apparent infectious disease but for some pathogens the ICP correlates
1079 with prevention of documented infection (e.g. hepatitis A and hepatitis B).

1080

1081 In some cases the ICP is a measure of the functional antibody response but if a strong correlation
1082 is shown between the results of assays of functional and total antibody, it may be possible to
1083 derive an alternative ICP based on total antibody (see Subsection 5.3.3).

1084

1085 Subsections 5.5.2 and 5.5.3 consider trial endpoints and the approach to analysis and
1086 interpretation of immunogenicity data in the presence or absence of an ICP and situations in
1087 which alternative approaches may be appropriate. For example, for some infectious diseases
1088 vaccine-elicited protection against clinical disease shows a broad correlation with a specific
1089 immunological parameter (e.g. with serum neutralising antibody elicited by HPV vaccines) but
1090 no cut-off value has been identified that shows a strong statistical correlation with protection in
1091 the short or longer-term in individuals or populations. In some other instances there is an
1092 indication of a threshold value that seems to broadly predict protection but the evidence is
1093 insufficient to regard this as an ICP applicable to a specific or to several different sub-
1094 populations or organism subtypes (e.g. IgG to specific pneumococcal serotypes). For some other
1095 infectious diseases there is no correlation that is well established between vaccine-elicited
1096 protection and measurable immune parameters (e.g. for acellular pertussis vaccines).

1097

1098 5.4.2 Establishing an ICP

1099

1100 Documentation of the immune response to natural infection, the duration of protection after
1101 clinically apparent infection (i.e. whether natural protection is life-long [solid immunity],
1102 temporary or absent) and the specificity of protection (i.e. whether the individual is protected
1103 only against specific subtypes of a micro-organism) should be taken into account when
1104 attempting to establish an ICP from clinical data. For example, to date, widely-accepted clinical
1105 ICPs have been established based on one or more of:

- 1106 • Serosurveillance and disease prevalence in specific populations
- 1107 • Passive protection using antibody derived from immune humans or manufactured using
1108 recombinant technology
- 1109 • Efficacy trials
- 1110 • Effectiveness trials
- 1111 • Investigation of vaccine failure in immunosuppressed populations

1112

1113 In the majority of cases clinical ICPs have been determined from vaccine efficacy trials that were
1114 initiated pre-licensure, often with long-term follow-up of subjects that extended into the post-
1115 licensure period. Efficacy trial protocols should plan to collect sufficient information to allow for

1116 analyses of the relationship between immune parameters and protection against clinically
1117 apparent disease. As a minimum this requires collection of post-vaccination samples from all or
1118 from a substantial subset of the vaccinated and control groups. Serial collection of samples over
1119 the longer-term along with follow-up surveillance for vaccine breakthrough cases has also served
1120 to support identification of ICPs.

1121

1122 To investigate the predictive capacity of a putative ICP protocols should pre-define the
1123 assessments to be applied to all cases of the disease to be prevented that occur in the vaccinated
1124 and control groups. These assessments should include investigation of the immune status of
1125 subjects and microbiological studies with the infecting micro-organisms whenever these have
1126 been recovered. For breakthrough cases from which there are both post-vaccination sera and
1127 organisms recovered it is recommended that functional antibody should be determined (or, if not
1128 possible, total antibody) for individuals against their own pathogen. An exploration of vaccine-
1129 elicited cell-mediated responses in individuals against their own pathogen may also be useful
1130 and, for some types of infectious diseases (such as tuberculosis), may be very important to
1131 further understanding of vaccine-associated protection. These data may be very important to
1132 investigate the broad applicability of the ICP depending on host and organism factors.

1133

1134 A single clinical ICP identified from a vaccine efficacy trial in a defined population may not
1135 necessarily be applicable to other vaccine constructs intended to prevent the same infectious
1136 disease. In addition, an ICP may not be applicable to other populations and disease setting. For
1137 example, putative ICPs have sometimes differed between populations of different ethnicities
1138 with variable natural exposure histories for subtypes of a single micro-organism. Thus the
1139 reliance that is placed on a clinical ICP, even if regarded as well-supported by the evidence,
1140 should take into account details of the efficacy trials from which it was derived.

1141

1142 Clinical ICPs have also been derived from or further supported by analyses of effectiveness data.
1143 The methods used to derive ICPs from effectiveness data have been very variable. In addition to
1144 the factors that may affect the relevance of ICPs derived from efficacy trials, estimates drawn
1145 from effectiveness data may in part reflect the type of immunization program in place and the
1146 extent to which protection of individuals relies on herd immunity rather than the initial and

1147 persisting immune response in the individual. The wider applicability of ICPs derived from such
1148 trials should be viewed in light of how and in what setting the estimates were obtained.

1149

1150 If it is not possible to derive a clinical ICP the interpretation of the human immune response data
1151 may take into account what is known about immunological parameters that correlate with
1152 protection in relevant animal models and any nonclinical ICPs that have been identified (e.g.
1153 from trials that assess passive protection and active immunization). This approach may be the
1154 only option available for interpreting immune responses to some new candidate vaccines.
1155 Nevertheless, ICPs derived wholly from nonclinical data should be viewed with caution and
1156 attempts should be made to obtain a clinical ICP whenever the opportunity arises (e.g. when the
1157 vaccine is used in an outbreak situation).

1158

1159 If conducted, human challenge trials may also provide preliminary evidence supporting an ICP.
1160 Nevertheless, these trials are usually conducted in non-immune healthy adults who are
1161 challenged with organisms that are not identical to, and do not behave like, virulent wild-types.
1162 Therefore these trials may point to a correlation between a specific immunological parameter and
1163 protection, which can be further investigated during the clinical development program.

1164

1165 **5.5 Immunogenicity trials**

1166

1167 5.5.1 Objectives

1168

1169 The objectives of pre-licensure and post-licensure clinical immunogenicity trials include (but are
1170 not limited to):

- 1171 i) To select vaccine formulations and posologies (including primary and booster doses)
- 1172 ii) To bridge the efficacy demonstrated in a specific population and using one vaccine
1173 formulation and posology to
 - 1174 a) The same vaccine when used in other settings or with alternative posologies or
 - 1175 b) A different vaccine intended to protect against the same infectious disease(s)
1176 as a licensed vaccine for which efficacy has been established
- 1177 iii) To achieve the objectives as in ii) but in the absence of prior efficacy data to which a

- 1178 bridge can be made
- 1179 iv) To support co-administration with other vaccines
- 1180 v) To support maternal immunization with the primary intent to protect the infant
- 1181 vi) To support major changes to the manufacturing process
- 1182 vii) To assess lot to lot consistency (8)

1183

1184 Subsections 5.5.2 and 5.5.3 address some general considerations for the selection of endpoints,
1185 the design of comparative immunogenicity trials and the analysis and interpretation of the
1186 results. Subsection 5.6 provides additional details of issues to take into consideration when
1187 designing, analyzing and interpreting comparative immunogenicity trials that have one or more
1188 of objectives i) to vii).

1189

1190 5.5.2 General considerations for trial designs

1191

1192 Immunogenicity trials are almost without exception comparative trials. Comparative trials
1193 include those in which all subjects receive the same vaccine formulation but there are differences
1194 between groups in how or to whom the vaccine is administered (e.g. using a different dose or
1195 dose interval, administering the vaccine to different age groups) and trials in which at least one
1196 of the trial groups receives an alternative treatment, which may be placebo and/or another
1197 licensed vaccine.

1198

1199 The design of comparative immunogenicity trials is driven by the characteristics of the vaccine,
1200 the trial objectives, the stage of clinical development, the trial population, the availability and
1201 acceptability of suitable comparators and what is known about immune parameters that correlate
1202 with protection (including whether or not there is an established ICP).

1203

1204 In comparative immunogenicity trials subjects should be randomized to one of the trial groups at
1205 enrolment. This also applies to trials that enroll sequential cohorts of subjects (e.g. in ascending
1206 dose trials in which at least some subjects are assigned to receive placebo or another vaccine). In
1207 some cases it may be appropriate that subjects who meet certain criteria (e.g. completed all
1208 assigned doses in the initial part of the trial) are re-randomized at a later stage of the trial to

1209 receive a further dose of a test or control treatment.

1210

1211 Whenever possible, comparative immunogenicity trials should be double blind. If the vaccines to
1212 be compared are visually distinguishable, it is preferable that designated persons at each trial site
1213 administer the products. Vaccinees (or their parents/guardians) and all other trial staff should
1214 remain unaware of the treatment assignment. If this is not feasible, or if the vaccines to be
1215 compared are given by different routes or at different schedules, the assays should be conducted
1216 by laboratory staff unaware of the treatment assignment.

1217

1218 In trials intended to provide only descriptive analyses of the immunogenicity data the trial
1219 sample size is usually based on considerations of feasibility and collection of sufficient safety
1220 data to support the design of sequential trials. Trials that aim to assess superiority or non-
1221 inferiority between vaccine groups should be sized according to the intended power and the pre-
1222 defined margins.

1223

1224 *5.5.2.1 Endpoints*

1225

1226 The choice of the primary trial endpoint and the range of other endpoints for immunogenicity
1227 trials should take into account Subsections 5.2, 5.3 and 5.4. Protocols should pre-define the
1228 primary, secondary and any other (which may be designated tertiary or exploratory) endpoints.
1229 Trial protocols may pre-define multiple co-primary endpoints:

- 1230 • For vaccines intended to protect against multiple subtypes of the same micro-organism (e.g.
1231 human papillomavirus vaccines, pneumococcal conjugate vaccines)
- 1232 • For combination vaccines, including vaccines that contain multiple micro-organisms (such
1233 as measles, mumps, rubella vaccine) or multiple antigens (such as combination vaccines
1234 used for the primary immunization series in infants)

1235

1236 The following should be taken into consideration when selecting the primary endpoint(s)
1237 following primary vaccination:

1238

- 1239 i. When an ICP has been established the primary endpoint is usually the percentage of

1240 vaccinees that achieves an antibody level at or above the ICP, which is sometimes referred
1241 to as the seroprotection rate.

1242

1243 ii. When there is no established ICP the primary endpoint is usually based on the parameter
1244 that is known or could be anticipated to best correlate with efficacy (e.g. a measure of
1245 functional antibody or, if no functional assay is available, a measure of total IgG).

1246 ➤ In some instances there may not be an ICP but there may be evidence to support
1247 application of a threshold value (i.e. the primary endpoint may be the percentage of
1248 vaccinees that achieves antibody levels at or above the threshold value, which is
1249 sometimes referred to as the responder rate).

1250 ➤ If there is no ICP or threshold that could be applied it may be appropriate that the primary
1251 endpoint is based on the seroconversion rate or on some other definition of the magnitude
1252 of the immune response that differentiates responders from non-responders. Comparisons
1253 of post-vaccination seropositivity rates may also be informative if pre-vaccination rates
1254 are very low.

1255

1256 For assessment of the immune response following administration of a vaccine to subjects who
1257 are already primed against one or more micro-organisms or antigens in the vaccine an
1258 anamnestic immune response is anticipated so that seroprotection, seroconversion (when defined
1259 by fold-rise from pre- to post-boost) and seropositivity rates after the booster dose will likely be
1260 very high. In these cases the most sensitive immunological parameter for detecting differences
1261 between groups may be the geometric mean concentration or titre.

1262

1263 After primary vaccination and after any additional doses the results of all immunological
1264 parameters measured should be reported, including seroprotection (if defined), seropositivity and
1265 seroconversion rates, geometric mean concentrations or titres and the reverse cumulative
1266 distributions, regardless of the pre-defined primary endpoint.

1267

1268 5.5.2.2 *Exploratory trials*

1269

1270 In the initial stages of vaccine clinical development, and when commencing further vaccine

1271 development to substantially modify the initial prescribing information, exploratory trials are
1272 commonly conducted to provide preliminary data on safety and immunogenicity. The assessment
1273 of the immune response may be designated as co-primary with safety or secondary. Exploratory
1274 trials are not usually powered or designed to address specific hypotheses. To obtain a clear
1275 picture of safety, these trials may include a placebo group if this is considered to be acceptable
1276 (e.g. a placebo group is commonly used in initial trials with a new candidate vaccine in healthy
1277 adults).

1278

1279 *5.5.2.3 Superiority trials*

1280

1281 Trials intended to detect superiority of immune responses are most often conducted during the
1282 selection of candidate vaccine formulations and posologies for further clinical investigation. It is
1283 common that these trials plan to assess whether a specific candidate vaccine formulation elicits
1284 superior immune responses compared to no vaccination against the disease to be prevented
1285 and/or compared to alternative formulations of the candidate vaccine. Initial dose selection trials
1286 are not usually formally powered to demonstrate superiority but this may be considered for
1287 larger trials that are intended to select a final formulation and posology for further investigation.

1288

1289 Superiority trials are also conducted when an adjuvant is proposed for inclusion in the vaccine,
1290 in which case it is usually expected that the immune response to at least one of the antigenic
1291 components of an adjuvanted formulation should be superior to that for a non-adjuvanted
1292 formulation that is otherwise identical. However, if addition of an adjuvant is intended to reduce
1293 the amount(s) of antigen(s) required (which may increase vaccine production capacity) it may
1294 suffice that the adjuvanted formulation with the reduced antigen dose is shown to be at least as
1295 immunogenic (i.e. non-inferior) as a non-adjuvanted formulation containing a higher dose.

1296

1297 Some trials may be designed to assess superiority between certain groups and non-inferiority
1298 between others or to assess superiority of immune responses to single or multiple antigenic
1299 components. For example, whilst adding an adjuvant may improve the immune responses to one
1300 or more antigenic components it should also not have a negative effect that is of potential clinical
1301 significance on the immune responses to all other antigenic components. In addition, a trial may

1302 be designed to establish that specific immune responses are at least non-inferior between trial
1303 groups and, if the pre-defined non-inferiority criteria are met, to then assess whether the
1304 responses are superior.

1305

1306 *5.5.2.4 Non-inferiority trials*

1307

1308 Most comparative immunogenicity trials are intended to show that the test vaccinated groups
1309 achieve comparable immune responses to the selected reference groups. Not all such trials need
1310 to be formally designed and powered to demonstrate non-inferiority but trials that are intended to
1311 be pivotal (i.e. the application for licensure or to modify the license is to be based mainly or
1312 wholly on the trial) should be adequately designed and powered to demonstrate non-inferiority
1313 using a pre-defined and justifiable non-inferiority margin. It is recommended that protocols and
1314 statistical analysis plans for each trial are developed in conjunction with an appropriately
1315 experienced statistician.

1316

1317 Factors to consider regarding the stringency of the non-inferiority margin include the clinical
1318 relevance of the endpoint, seriousness of the disease to be prevented and the vulnerability of the
1319 target population. More stringent margins may be appropriate when the vaccine is intended to
1320 prevent severe or life-threatening diseases and will be used in particularly vulnerable populations
1321 (e.g. infants and pregnant women). If a new candidate vaccine is known to offer substantial
1322 benefits in terms of safety or improved coverage, less stringent margins may be considered. In
1323 contrast, a more stringent margin could be considered when there is a potential for a downward
1324 drift in immunogenicity such as that which could occur when a new candidate vaccine can be
1325 compared only with vaccines that were themselves approved based on non-inferiority trials (see
1326 Subsection 5.6.2.1). As a result of these considerations it is possible that different non-inferiority
1327 margins may be considered appropriate to interpret immune responses to any one specific
1328 antigenic component in different settings.

1329

1330 As a general rule, for the purposes of establishing non-inferiority between vaccine groups
1331 based on GMT or GMC ratios for antibody titres or concentrations, it is suggested that the
1332 lower bound of the 95% confidence interval around the ratio (test vs. reference vaccine) should

1333 not fall below 0.67. Under certain circumstances, NRAs may consider allowing a lower bound
1334 of 0.5. The criterion should be selected taking into account whether or not an ICP has been
1335 identified. In addition, any marked separations between the reverse cumulative distributions of
1336 antibody titres or concentrations should be discussed in terms of the potential clinical
1337 implications, even if these occur only at the lower or upper ends of the curves.

1338

1339 When comparing seroprotection rates, seroconversion rates or percentages of vaccines with
1340 immune responses that are above a pre-defined threshold, sponsors frequently select a non-
1341 inferiority margin of 10%, which gives modest sample sizes. There is very rarely any
1342 justification provided for this margin nor is there any discussion of the possible consequences
1343 of a candidate vaccine eliciting seroprotection or seroconversion rates or percentages with
1344 responses above a pre-defined threshold that are lower those in the licensed vaccine group to
1345 such an extent that the lower 95% confidence interval around the difference (test – reference)
1346 approaches -10%. If a sponsor does pre-define such a margin without adequate justification,
1347 the implications of the actual 95% confidence intervals that are observed should be reviewed
1348 in light of the considerations described above.

1349

1350 5.5.3 Analysis and interpretation

1351

1352 A statistical analysis plan should be finalized before closing the trial database and unblinding
1353 treatment assignments (if these were blinded). This should include any planned interim analyses,
1354 which should be adequately addressed in terms of purpose, timing and any statistical adjustments
1355 required.

1356

1357 The immunogenicity data from all subjects with at least one result for any immunological
1358 parameter measured in the trial should be included in the clinical trial report. The analysis of the
1359 immune response based on any one parameter is commonly restricted to all subjects with a pre-
1360 vaccination measurement (if this is to be obtained from all subjects) and at least one post-
1361 vaccination measurement. Protocols may also restrict the primary analysis population to subjects
1362 with pre- and post-vaccination results who received all the assigned doses within pre-defined
1363 windows around the intended schedule and had no other major protocol violations (e.g. met the

1364 inclusion and exclusion criteria). Other analysis populations of interest may be pre-defined in
1365 accordance with the primary or secondary objectives (e.g. age sub-groups, pre-vaccination
1366 serostatus). Whatever the pre-defined primary analysis population, all available immunogenicity
1367 data should be presented in the clinical trial report.

1368
1369 If a trial fails to meet the pre-defined criteria for superiority and/or non-inferiority with respect to
1370 any of the antigenic components the possible reasons for the result and the clinical implications
1371 should be carefully considered before proceeding with clinical development or licensure. The
1372 considerations may take into account the basis for setting the pre-defined criteria (e.g. does
1373 failure to meet the criteria strongly imply that lower efficacy may result), the comparisons made
1374 for all other immune parameters measured (e.g. were criteria not met for only one or a few of
1375 many antigenic components of the vaccine), any differences in composition between the test and
1376 the comparator vaccines that could explain the result, the severity of the disease(s) to be
1377 prevented and the overall anticipated benefits of vaccine, including its safety profile. Subsection
1378 5.6 provides some further examples and issues to consider.

1379
1380 Additional analyses of the data that were not pre-specified in the protocol and/or the statistical
1381 analysis plan (i.e. *post hoc* analyses) should generally be avoided. If conducted, they should
1382 usually be viewed with caution although the results may stimulate further clinical trials to
1383 investigate specific issues.

1384

1385 **5.6 Specific considerations for trial design and interpretation**

1386

1387 This Subsection should be read in conjunction with Subsection 5.5

1388

1389 5.6.1 Selection of formulation and posology

1390

1391 The vaccine formulation is determined by the numbers of micro-organisms or amounts of
1392 antigens and, if applicable, adjuvant that is to be delivered in each dose as well as the route of
1393 administration.

1394

1395 The vaccine posology for a specific route of administration includes:

- 1396 • Dose content (as for formulation) and volume delivered per dose
- 1397 • Dose regimen (number of doses to be given in the primary series and, if applicable, after the
1398 primary series)
- 1399 • Dose schedule (dose intervals within the primary series and between the primary series and
1400 any further doses)

1401

1402 The vaccine posology for any one vaccine may vary between target populations (e.g. age groups
1403 and according to prior vaccination history) in one or more aspects (content, regimen or
1404 schedule).

1405

1406 The following sections outline the immunogenicity data that are usually generated to support the
1407 vaccine formulation and posology and to assess the need for, and immune response to, additional
1408 doses of the vaccine after completion of the primary series. Section 7 addresses the importance
1409 of the safety profile when selecting vaccine formulations and posologies.

1410

1411 *5.6.1.1 Selecting the formulation and posology for initial licensure*

1412

1413 The vaccine formulation and posology that is initially approved should be supported by safety
1414 and immunogenicity data, with or without efficacy data, collected throughout the pre-licensure
1415 clinical development programme. At the time of initial licensure the data should at least support
1416 the formulation and posology for the primary series, which may consist of one or more doses.

1417

1418 Depending on the intended formulation of the new candidate vaccine the following
1419 considerations may apply:

1420

- 1421 i) Whenever a new candidate vaccine contains any micro-organisms or antigens not previously
1422 used in human vaccines, with or without others already used in human vaccines, the initial trials
1423 usually explore the immune responses to different amounts of each of the new micro-organisms
1424 or antigens when given alone in non-immune healthy adult subjects. These trials should describe
1425 the dose-response curve and may indicate a plateau for the immune responses above a certain

1426 dose level. The next trials usually evaluate immune responses to further doses at various dose
1427 intervals to evaluate the kinetics of the immune response as well as any increment in immune
1428 response that is achieved by further doses. The transition from trials in healthy adults to trials in
1429 subjects in the target age range at the time of initial licensure (if this is not confined to young
1430 adults) should occur as soon as this can be supported taking into account the safety profile.

1431

1432 However, evaluating the immune response to each of the new micro-organisms or antigens alone
1433 may not be a feasible undertaking. For example, if the vaccine construct is manufactured in such
1434 a way that production of individual antigens is not feasible then the evaluation of the appropriate
1435 vaccine dose may be based solely on studies with the entire construct. Another example concerns
1436 vaccines intended to protect against multiple subtypes of an organism. In this case, the use of
1437 micro-organisms or antigens that could be regarded as broadly representative in the first trials
1438 may provide some idea of the likely response to other subtypes. Further trials may then explore
1439 formulations that contain increasing numbers of the subtypes with the objective of assessing the
1440 effect of combining them into a single product on the immune response.

1441

1442 ii) For new candidate vaccines that contain known antigenic components not previously
1443 combined together into a single vaccine the initial trials are usually conducted in subjects within
1444 the age ranges approved for licensed vaccines that contain some or all of the same antigenic
1445 components. The aim is to demonstrate non-inferiority of immune responses to each of the
1446 intended antigenic components when combined into a candidate formulation with co-
1447 administration of licensed vaccines that together provide all of the same antigenic components.
1448 The same approach applies whenever the antigenic components are not combined into a single
1449 formulation but the contents of more than one pre-formulated product have to be mixed
1450 immediately before administration to avoid a detrimental physico-chemical interaction.

1451

1452 iii) For new candidate vaccines that contain known and one or more new antigenic components
1453 the initial trials may aim to demonstrate non-inferiority of immune responses to each of the
1454 known antigenic components when combined into a candidate formulation with separate
1455 administrations of known and new antigenic components. It may also be informative to include a
1456 control group that receives co-administration of known and new antigenic components. The

1457 exact design depends on the availability of a single licensed vaccine containing the known
1458 antigenic components or whether more than one licensed vaccine has to be given.

1459

1460 iv) For any vaccine formulation to which an adjuvant is to be added there should be adequate
1461 data already available (which may apply to known adjuvants) or data should be generated (new
1462 adjuvants or when using any adjuvant with a new antigenic component) to demonstrate that
1463 addition of the adjuvant elicits a superior immune response to one or more antigenic components
1464 without a potentially detrimental effect on any other antigenic components. Alternatively, data
1465 should demonstrate that including the adjuvant allows for the use of a much lower dose of an
1466 antigenic component to achieve the desired level of immune response. Trials should evaluate a
1467 sufficient range of combinations of antigenic components and adjuvant to support the final
1468 selected formulation.

1469

1470 v) The total data generated should be explored to identify the criteria to be applied for the
1471 determination of an appropriate shelf-life of the vaccine. This is usually of particular importance
1472 to vaccines that contain live micro-organisms. Depending on data already generated, it may be
1473 necessary to conduct additional trials with formulations known to contain a range of micro-
1474 organism numbers or antigen doses to identify appropriate limits at end of shelf-life.

1475

1476 vi) Comparative immunogenicity trials may be needed to determine schedules appropriate for
1477 specific target populations, taking into account the urgency to achieve protective immunity (i.e.
1478 based on diseases to be prevented and their epidemiology). The data generated across all the
1479 trials should determine the minimum period that should elapse between doses and the effects of
1480 delaying doses to support acceptable windows around scheduled doses. Additionally, for some
1481 vaccines it may be useful to explore the shortest time frame within which doses may be
1482 completed without a detrimental effect on the final immune response (e.g. for vaccines for
1483 travelers who may need to depart at short notice and for vaccines intended to provide post-
1484 exposure prophylaxis).

1485

1486 The assessment of the effects of dose interval and the total time taken to complete the primary
1487 series is a particular issue for vaccines intended for use in infants due to the very wide range of

1488 schedules in use in different countries (e.g. 3-dose schedules include 6-10-14 weeks and 2-4-6
1489 months). In general, experience indicates that the magnitude of the post-primary series immune
1490 responses broadly correlates with the age of infants at the time of the final dose. If a trial using a
1491 6-10-14 weeks or 2-3-4 months schedule demonstrates highly satisfactory immune responses it is
1492 reasonable to expect that schedules that either commence later in infancy, use longer dose
1493 intervals and/or in which the final dose is given at 5-6 months or later will also be highly
1494 satisfactory. In contrast, the results of the latter types of schedules cannot be used to support use
1495 of earlier and more condensed schedules.

1496
1497 vii) All of the data generated in accordance with points i) to vi) should be taken into account
1498 when selecting the final formulation and posology or posologies. The selection process is more
1499 straightforward if there are established ICPs that can be applied to interpretation of the results for
1500 at least some of the antigenic components. In the absence of an ICP, which frequently applies to
1501 new micro-organisms or antigens, the posology may be selected from considerations of any
1502 plateau effects that are observed and the safety profile of various doses and regimens.

1503
1504 It is not unusual that the final selected formulation and posology to some extent represents a
1505 compromise between immunogenicity and safety or, for combination vaccines, between the
1506 potential benefits of a vaccine that can protect against multiple types of infectious disease with
1507 some negative effects on immune response that may occur. These negative effects may result
1508 from a physicochemical interaction between vaccine components and/or a negative immune
1509 interference effect for some antigenic components with or without a positive immune
1510 interference effect for some others. The rationale for the final selection requires careful
1511 discussion in the application dossier.

1512
1513 *5.6.1.2 Amending or adding posologies after initial licensure*

1514
1515 Clinical trials conducted after first licensure may be designed to address one or more of the
1516 following:

1517 a. Change the number of doses or dose intervals. In this case the control group should be
1518 vaccinated using the licensed posology and the trial should be conducted in a population

- 1519 for which the vaccine is already licensed.
- 1520 b. Use of the licensed posology in a new population (e.g. in subjects who are younger or
1521 older than the currently licensed age group; in subjects with specific underlying
1522 conditions, such as immunosuppression). In this case the trial should compare use of
1523 the licensed posology in the new target population and the population for which the
1524 vaccine is already licensed.
- 1525 c. Use of an alternative to the licensed posology in a new population. In this case the
1526 alternative posology administered to the new population should be directly compared
1527 with the licensed posology in the licensed population.
- 1528 d. Support alternative routes of administration for the licensed formulation (e.g. adding sub-
1529 cutaneous or intra-dermal injection to intra-muscular use).

1530

1531 Post-licensure clinical trials may also be conducted to support changes in formulation.
1532 Formulation changes other than adding or removing a preservative or removing thiomersal from
1533 the manufacturing process usually result in a modified product that is considered to be a new
1534 candidate vaccine from a regulatory standpoint (i.e. it would require a new application dossier
1535 and adequate trials to support separate licensure).

1536

1537 *5.6.1.3 Post-primary doses*

- 1538
- 1539 a. Need for post-primary doses

1540

1541 The need to administer additional doses, and the timing of these doses, may be determined
1542 before and/or after first licensure.

1543

1544 To date, very few licensed vaccines are recommended only for use in a primary series. Examples
1545 include inactivated hepatitis A vaccines and hepatitis B vaccines containing recombinant surface
1546 antigen [HBsAg] for which very long term follow-up continues to suggest that additional doses
1547 are not necessary to maintain protection in those who had a robust immune response to the
1548 primary series. For all other vaccines one or more additional doses of the same or another
1549 vaccine that protects against the same disease(s) is recommended or the prescribing information

1550 states that it is not yet known whether further doses will be necessary.

1551

1552 If experience with other similar vaccines clearly indicate that additional doses of a new candidate
1553 vaccine will be needed the clinical development program should incorporate this in the overall
1554 assessment of immune responses.

1555

1556 If it is not known whether post-primary doses of a new candidate vaccine will be needed to
1557 maintain protection it is preferable that this should be determined from long-term follow-up of
1558 subjects who were enrolled in efficacy trials and/or from post-licensure effectiveness trials.
1559 Although the long-term monitoring of antibody persistence is important, these data alone cannot
1560 determine if another dose is needed unless there is evidence or a strong reason to expect that
1561 failure to maintain circulating antibody above a certain level (e.g. above the ICP if there is one)
1562 is associated with risk of breakthrough disease (even when the primary series of the vaccine
1563 elicited an immune memory response).

1564

1565 Until it is clear whether or not additional doses are needed, it is prudent to plan to obtain data on
1566 the immune response to additional doses at different intervals after the last dose of the primary
1567 series so that data are available should it become clear that an additional dose is required.

1568

1569 b. Assessment of priming during the primary series

1570

1571 Not all vaccines elicit a T-cell-dependent immune response that results in priming of the immune
1572 system and an anamnestic response to further doses. The administration of post-primary doses of
1573 a new candidate vaccine that contains one or more micro-organisms or antigens not previously
1574 used in human vaccines provides an opportunity to assess whether there was successful priming
1575 of the immune system during the primary series, in which case subsequent doses will serve to
1576 boost the immune response (see Subsection 5.2).

1577

1578 When assessing the immune response to additional doses and determining whether or not the
1579 primary series elicited immune memory the following should be taken into account:

1580 a. Trials in which additional doses are administered may be extension phases of primary series

- 1581 trials or new trials in subjects with documented vaccine histories.
- 1582 b. When assessing whether the primary series elicited immune memory the optimal design is to
1583 compare subjects who previously completed a full primary series of the candidate vaccine
1584 with a control group consisting of subjects not previously vaccinated. Control subjects
1585 should be matched for age and for any host or demographic factors that might impact on
1586 their immune response (e.g. they should be resident in similar areas so that any natural
1587 exposure is likely similar).
- 1588 c. If the new candidate vaccine elicited immune memory in the primary series the immune
1589 response to the additional (i.e. booster) dose should usually be superior to that observed in
1590 individuals who have not been vaccinated against the disease to be prevented based on
1591 comparisons of the geometric mean concentrations or titres of antibody. The percentages
1592 that achieve seropositivity or seroprotection (as defined) may not be different between the
1593 two groups if a single dose of the vaccine is highly immunogenic even in unprimed
1594 individuals.
- 1595 d. The immune response to the additional dose in primed and unprimed subjects may also be
1596 differentiated based on the rapidity of the rise in antibody levels (faster in primed) and in
1597 terms of antibody avidity (greater in primed).
- 1598 e. If the immune response as measured by geometric mean antibody concentrations or titres in
1599 the primed group is not superior to that in controls this does not always mean that the
1600 primary series did not elicit immune memory. For example, this may occur when natural
1601 priming has occurred in a substantial proportion in the control group that was not previously
1602 vaccinated against the disease to be prevented, in which case the rapidity of response and
1603 measurements of avidity may also not be distinguishable between groups. If natural priming
1604 has occurred it may or may not be detectable from pre-vaccination antibody levels in the
1605 control group.
- 1606 f. If an immune memory response is elicited in the primary series it may be possible to achieve
1607 a robust anamnestic response using a much lower dose of an antigenic component compared
1608 to the primary series. A lower boosting dose may also provide a better safety profile (e.g. as
1609 occurs with diphtheria toxoid).
- 1610 g. For polysaccharide-protein conjugate vaccines that elicit immune memory it may be
1611 informative to compare boosting with the same type of conjugate used for priming with an

1612 alternative conjugate (e.g. to prime with a tetanus toxoid conjugate and boost with a
1613 CRM197 conjugate and *vice versa*).

1614 h. It may also be informative to assess the ability of a candidate vaccine to achieve cross-
1615 priming by using heterologous antigenic components for priming and boosting. This may be
1616 assessed by comparing boosting with the same vaccine used to prime with administration of
1617 a formulation (which may be a licensed vaccine or an unlicensed product manufactured
1618 specifically for the trial) containing a different micro-organism or antigen that is known to
1619 be closely related but not identical to that in the vaccine (e.g. material derived from an
1620 influenza virus of a different clade).

1621 i. Elicitation of an immune memory response to a vector for an antigen after the first dose(s)
1622 may interfere with or wholly prevent the immune response to the antigen after subsequent
1623 doses (e.g. this may be observed when using adenoviruses capable of infecting humans as
1624 live viral vectors). It is essential to understand whether or not this occurs since it may
1625 necessitate the use of a different vector for the antigen or an entirely different vaccine
1626 construct to deliver subsequent doses.

1627 j. There are some antigens that not only do not elicit an immune memory response but also
1628 demonstrate hypo-responsiveness to further doses. The best known examples are some of
1629 the unconjugated meningococcal and pneumococcal polysaccharides (17, 18). In the past
1630 these were sometimes administered to assess whether corresponding conjugated
1631 polysaccharides had elicited immune memory in the primary series based on the premise
1632 that this would better mimic the immune response to natural exposure compared to
1633 administration of a further dose of the conjugate. This practice is not recommended since it
1634 is possible that a dose of unconjugated polysaccharide could result in blunted immune
1635 responses to further doses of the conjugate.

1636

1637 5.6.2 Using immunogenicity data to predict efficacy

1638

1639 Immunogenicity data may be used to predict efficacy with varying levels of confidence when:

1640 a. There is a well-established ICP that can be used to interpret the immune responses to a
1641 specific antigenic component (see Subsections 5.4 and 5.5). Comparative
1642 immunogenicity trials are recommended since they provide a control for interpretation of

- 1643 any unexpected findings and for safety. Depending on the objectives the comparator may
1644 be the same vaccine used as currently licensed or a licensed vaccine that has been widely
1645 used with no known problems regarding its effectiveness and which contains all or as
1646 many as possible of the same antigenic components as the candidate vaccine.
- 1647 b. It is possible to use immune responses to bridge to estimates of vaccine efficacy obtained
1648 from well-designed clinical trials (i.e. to conduct bridging trials); see Subsection 5.6.2.1.
- 1649 c. There is no ICP nor is it possible to bridge to a prior demonstration of efficacy; see
1650 Subsection 5.6.2.2.

1651

1652 *5.6.2.1 Bridging to efficacy data*

1653

1654 There are two main situations to consider. In both cases comparative immunogenicity trials
1655 designed to demonstrate non-inferiority are recommended. The choice of comparator is a critical
1656 factor for interpretation of the results.

1657

1658 i) Modifying the use of the same vaccine for which efficacy has been estimated

1659

1660 As described in Section 6, vaccine efficacy trials are usually conducted in specific target
1661 populations, characterised by factors such as age, region (which may define endemicity for some
1662 infectious diseases) and health status, using the intended final vaccine posology. Before or after
1663 initial licensure trials may be conducted with the aim of extending the use of the vaccine to other
1664 populations and/or to support alternative posologies.

1665

1666 When a different age group or posology is proposed or when extending use from
1667 immunocompetent to immunocompromised subjects it is usually very clear that a bridging trial is
1668 necessary. Whether or not a bridging trial is necessary to support use in regions other than where
1669 the estimate of efficacy was obtained requires careful consideration. Such trials should be
1670 required for licensure only if there are compelling scientific reasons to expect that the immune
1671 response to the vaccine, and therefore its efficacy, could be significantly different due to host
1672 factors (such as common underlying conditions that may affect immune responses) and/or
1673 geographical factors (such as distributions of subtypes of organisms, levels of natural exposure

1674 and for trials in infants the possibility that high levels of maternal antibody could interfere with
1675 responses to the primary series).

1676

1677 The usual trial design involves a direct comparison between the new population and/or posology
1678 and a control group in which subjects representative of the efficacy trial population receive the
1679 previously studied posology. It may also be acceptable that an indirect comparison is made with
1680 the immunogenicity data that were obtained during the efficacy trial, in which case the vaccine
1681 formulation and assay used should be the same as used in the efficacy trial whenever possible.

1682

- 1683 a. If the vaccine used in the efficacy trial is no longer available the comparator should be as
1684 similar as possible to the original. Over time, it may be that the only bridge back to the
1685 efficacy data is via a comparison with a licensed vaccine that was itself licensed based on a
1686 bridging efficacy trial. As the number of bridging steps that has occurred between the
1687 original efficacy data and the licensed comparator vaccine increases, so the reliance that may
1688 be placed on a demonstration of non-inferiority to predict efficacy is weakened. This
1689 consideration also applies when the vaccine for which efficacy was estimated has been
1690 extended based on bridging efficacy for the shared subtypes (e.g. when additional subtypes
1691 have been added) and the extended vaccine has replaced the original vaccine in the market.
- 1692 b. If the assay has changed and has not been or cannot be directly compared to the original
1693 assay used during the efficacy trial it may be possible to re-assay stored sera collected
1694 during the prior efficacy trial in parallel with the sera from the new trial population.

1695

1696 If it remains unknown which immunological parameter best correlates with efficacy it is
1697 preferable that the primary comparison between vaccines is based on functional antibody
1698 whenever this is feasible.

1699

1700 ii) Inferring the efficacy of a new candidate vaccine

1701

1702 In this case the main evidence of efficacy for licensure comes from one or more bridging
1703 efficacy trials. The same considerations regarding primary comparison, choice of comparative
1704 vaccine and assay apply as described above.

1705

1706 If the new candidate vaccine is an extended version of a licensed vaccine and/or it contains
1707 additional subtypes of an organism not included in a licensed vaccine the interpretation of the
1708 immune responses to the unshared types in a comparative immunogenicity trial is not
1709 straightforward. Approaches that could be considered include comparing immune responses to
1710 each additional subtype with a mean response across all subtypes or the lowest response to an
1711 individual subtype included in the vaccine for which efficacy was demonstrated. Both of these
1712 approaches may provide a route to licensure but the limitations of these comparisons to predict
1713 efficacy should be taken into account when considering the overall benefit-risk relationship for
1714 the new vaccine and the collection of effectiveness data in the post-licensure period is
1715 recommended.

1716

1717 *5.6.2.2 Other approaches*

1718

1719 When there is no ICP nor is it possible to bridge to a prior demonstration of efficacy licensing a
1720 new candidate vaccine is problematical. This situation is most likely to apply to new vaccines
1721 against rare infectious diseases such as some viral haemorrhagic fevers, for which outbreaks do
1722 not occur in substantial numbers of persons or are of short durations, and some micro-organisms
1723 that could be used for bioterrorism purposes. Another important situation is the development of
1724 influenza vaccines against potential pandemic strains.

1725

1726 Approaches may include establishing a nonclinical model of efficacy that is thought to be
1727 relevant to the human infection and identifying which immunological parameter best correlates
1728 with protection (and if possible a putative ICP), trials of natural infection and protection against
1729 further disease and any passive protection data that may be available from nonclinical or clinical
1730 trials. If a vaccine has already been licensed based on evidence derived from one of these
1731 approaches any changes to the vaccine usage is subject to the same issues.

1732

1733 Although licensure of vaccines based on these approaches means that it is not likely to be
1734 possible to achieve a high level of confidence in the level of efficacy in humans, having available
1735 vaccines that have already been subjected to a full review of quality and nonclinical data as well

1736 as at least some safety and immunogenicity data in humans does mean that they could be ready
1737 for rapid use in an emergency situation. Nevertheless, for these products it is particularly
1738 essential that protocols are developed in advance of any such emergency so that adequate data
1739 can be collected to assess efficacy/effectiveness whenever the opportunity arises.

1740

1741 5.6.3 Co-administration trials

1742

1743 Comparative immunogenicity trials intended to support co-administration of a vaccine with one
1744 or more other vaccines (i.e. administration at the same time but using different limbs for
1745 injection or multiple routes of administration) should demonstrate non-inferiority for immune
1746 responses to each of the co-administered antigenic components (see Subsection 5.5.3). The
1747 immunological parameters applied to each comparison may differ depending on vaccine content.
1748 It should be noted that co-administration may also enhance the immune response to certain
1749 antigens but so far there have not been instances in which this has been regarded as a cause for
1750 concern since the safety of co-administration has been acceptable.

1751

1752 When there are multiple licensed products containing the same antigenic components that could
1753 be co-administered with the vaccine under trial (e.g. combination vaccines intended for the
1754 routine infant primary immunization series) it is not feasible nor should it be necessary to
1755 conduct trials with each licensed product. The vaccine(s) chosen for trial should be as
1756 representative as possible of the range of licensed products.

1757

1758 An exception arises when there are several different types of polysaccharide-protein conjugate
1759 vaccines available that may be co-administered with the vaccine under trial. This is usually only
1760 an issue when the vaccine under trial contains protein that is the same as, or similar to, that in
1761 available conjugates. In this case it is important to appreciate that the results obtained with any
1762 one conjugate may not be applicable to other types of conjugate (e.g. lack of immune
1763 interference with a tetanus toxoid conjugate does not rule out that this could occur with a
1764 CRM197 conjugate).

1765

1766 If multiple doses of the co-administered vaccines are needed it is usual that the comparison

1767 between groups is made only after completion of all doses. The schedule at which the vaccines
1768 are co-administered may also be an issue if there are several possible alternatives (e.g. as applies
1769 to vaccines for the primary immunization series in infants and for vaccines against hepatitis A
1770 and B). Consideration may be given to using a schedule that is most likely to detect an effect if
1771 there is one.

1772

1773 These trials usually have the following designs:

- 1774 • Randomized parallel group trials in which different groups of subjects receive the vaccine
1775 under trial alone, the vaccine intended for co-administration and both together. If there is
1776 more than one additional vaccine that may be co-administered at the same time additional
1777 groups should receive each of these vaccines alone. In this case it is useful for interpretation
1778 of any observed effects to also add groups that each receives the vaccine under trial with one
1779 of the additional vaccines as well as a group that receives them all together.
- 1780 • Randomized trials that use a staggered administration design. This approach is necessary
1781 when it is not possible to withhold any antigenic components to be co-administered (e.g.
1782 during the infant primary schedule). In these trials one group receives the co-administered
1783 vaccines at a chosen schedule while the control group receives either the vaccine under trial
1784 or the vaccine to be co-administered at the same schedule as the test group and the other
1785 vaccine is given one month later (or other appropriate interval). For completeness, an
1786 additional control group may be used in which the order of staggered vaccine
1787 administrations is reversed. The final dose and sampling occurs at least one month later
1788 compared to the co-administration group which, in infants, could have some impact on the
1789 magnitude of the immune response.

1790

1791 5.6.4 Immunization of pregnant women

1792

1793 *5.6.4.1 Aims of immunization during pregnancy*

1794

1795 Immunization during pregnancy may be undertaken with the primary aim to:

1796

1797 a. Protect the mother. For any candidate vaccine under development for prevention of an

1798 infectious disease in which the target population includes adolescents and adults there
1799 is a need to consider the importance of generating data in pregnant women to support
1800 its use. The considerations should take into account the nature of the vaccine construct
1801 (e.g. does the vaccine contain a live organism that is replication-competent), whether
1802 pregnant women can reasonably avoid exposure to an infectious agent (e.g. by not
1803 travelling) and whether they may have the same risk of exposure but a greater risk of
1804 experiencing severe disease compared to non-pregnant women of the same age.

1805

1806 b. Protect the infant from an infectious disease for a limited period after birth by means of
1807 trans-placental transfer of maternal antibody. In this case there may be a potential benefit
1808 to the mother (e.g. influenza, acellular pertussis) or no or negligible potential benefit to
1809 the mother (e.g. respiratory syncytial virus and Streptococcus Group B).

1810

1811 *5.6.4.2 Dose-finding in pregnancy*

1812

1813 For new candidate vaccines intended for use in pregnant women and for licensed vaccines not
1814 authorized for use in pregnancy the first clinical trials to support this use should be conducted in
1815 non-pregnant adults, including or consisting only of women of child-bearing age (19). Once
1816 there are adequate relevant nonclinical data with satisfactory findings and some data on immune
1817 responses in non-pregnant women data should be obtained from pregnant women, covering a
1818 representative age range, so that the effects of pregnancy on the immune response can be
1819 evaluated. The doses tested initially in pregnant women should be based on the non-pregnant
1820 adult data but may need to be adjusted (in terms of antigen dose or dose regimen) after review of
1821 results from initial trials due to the effects of pregnancy on the immune system. Additional
1822 considerations for dose-finding when the aim is primarily to protect the infant are provided in
1823 Subsection 5.6.4.3.

1824

1825 In all trials conducted in pregnant women adequate mechanisms should be in place to document
1826 the outcome of the pregnancy, including the duration of gestation at time of delivery, the
1827 condition of the infant at birth and the presence of any congenital conditions. Depending on the
1828 type of vaccine, it may also be considered appropriate to collect information on developmental

1829 milestones at least during the first few years of life.

1830

1831 *5.6.4.3 Passive protection of infants*

1832

1833 Transfer of IgG across the placenta does not occur to any extent until the third trimester. If the
1834 vaccine is not expected to benefit the mother, then administration in the third trimester should be
1835 studied. If the aim is also to provide some benefit to the mother, administration earlier in
1836 pregnancy should be studied. In this case, since the immune response to vaccination changes as
1837 pregnancy progresses and women do not always access healthcare early on, the effect of dosing
1838 at different times during pregnancy should be evaluated.

1839

1840 If it is expected that a substantial proportion of adults are likely to already have evidence of
1841 humoral immunity against the infectious disease to be prevented so that the aim of vaccination
1842 during pregnancy is to increase the amount of antibody transferred to the fetus, the trials in
1843 pregnant women may need to include exploration of doses and, if more than one dose is needed,
1844 dose intervals in seropositive as well as seronegative adults.

1845

1846 When the aim is primarily to protect the infant, dose-finding trials in pregnant women should
1847 include measurement of antibody levels in cord blood samples taken at delivery. The number of
1848 samples obtained should be sufficient to provide an estimate of inter-individual variability. In
1849 addition, efforts should be made to collect cord blood data that cover a range of times between
1850 maternal vaccination and delivery, that allow for evaluation of the effects of unexpected early
1851 delivery and which measure the impact of placental dysfunction (e.g. based on infants of low
1852 birth weight for their gestational age). The cord blood levels in infants born to vaccinated
1853 mothers who receive the final selected vaccine posology should be clearly superior to that in
1854 infants born to mothers who were not vaccinated, regardless of the pre-vaccination serostatus of
1855 the mothers. Secondary analyses could examine whether this finding also applies within subsets
1856 of mothers who were seronegative or seropositive prior to vaccination.

1857

1858 The duration of detectable maternal antibody in infants should be documented. To avoid multiple
1859 bleeds in individual infants this may be documented by randomization of mothers such that their

1860 infants are sampled only once or a few times at staggered defined intervals so that the total data
1861 are used to describe the antibody decay curve. These data are particularly important when it is
1862 planned that passive protection via maternal antibody will be followed by active vaccination of
1863 infants against the same antigen(s).

1864

1865 If there is an immune correlate of protection established for the infectious disease to be
1866 prevented the aim of the immunogenicity trials should be to identify a maternal vaccination
1867 regimen that results in cord blood levels that exceed the ICP in a high proportion of new born
1868 infants. If there is no ICP, an efficacy trial in infants is usually needed (see Section 6).

1869

1870 5.6.5 Changes to the manufacturing process

1871

1872 Changes made to the product composition (e.g. addition of, removal of, or change in adjuvants or
1873 preservatives) or manufacture (changes to process, site or scale) during the pre-licensure clinical
1874 development program or after licensure do not always need to be supported by comparative
1875 clinical immunogenicity trials between the prior and the newer products.

1876

1877 For example, it is common that the scale of manufacture changes during the pre-licensure
1878 development program but this step alone would not be expected to have a clinically significant
1879 effect in the absence of other changes. In addition, the later confirmatory trials usually use
1880 product from final scale process. Also, any clinical effects of changes to the manufacturing
1881 process during the pre-licensure program may be evident from the results of sequential trials in
1882 similar populations or may not matter if the pivotal immunogenicity and/or efficacy trials use
1883 vaccine made using the final process. If this is not the case, and for all changes that are made
1884 post-licensure, consideration must be given to whether a clinical trial to compare vaccine
1885 manufactured using the prior and new processes is required. This decision must be taken on a
1886 case by case basis after a full evaluation of the in-vitro and any nonclinical in-vivo data
1887 describing and supporting the change. It is usually acceptable that a single lot of vaccine made
1888 using each process is sufficient for the comparison.

1889

1890 In the post-licensure period there may be many changes to the manufacturing process over time.

1891 Over time it is possible that each one of these was considered too minor to merit conduct of a
1892 clinical trial but the product that results from multiple minor changes could be substantially
1893 different to that which was initially licensed. When considering the potential impact of what
1894 seems to be a relatively minor change to the production process that, not alone, would merit a
1895 clinical trial it may be important to consider the full history of changes that have been allowed
1896 without clinical data and to consider whether the sum total of changes could have a clinical
1897 impact. In this situation, when many years have passed, a clinical trial of the current compared to
1898 the original licensed vaccine will not be possible. If disease surveillance suggests that there could
1899 be a problem with vaccine effectiveness, a clinical trial that compares the current vaccine with
1900 another licensed vaccine for which there is a lot of clinical experience may be considered useful.

1901

1902 5.6.6 Lot-to-lot consistency trials

1903

1904 Some NRAs request lot-to-lot consistency trials during the pre-licensure clinical development
1905 program for all new candidate vaccines. Where these trials are not requested as a routine they
1906 may be considered for certain types of vaccines where there is inherent variability in
1907 manufacture of the product. If requested, the rationale for conducting the trial and the objectives
1908 should be very clear.

1909

1910 In these trials the usual expectation is that 95% confidence interval around each pairwise
1911 comparison of the post-vaccination geometric mean concentrations/titres falls within pre-defined
1912 limits. The clinical implications of results that show that one or more comparisons do or do not
1913 meet the pre-defined criteria set around the ratios are unknown and interpretation of the results
1914 should take into account all of the available immune response data.

1915

1916 **6. Efficacy and effectiveness**

1917

1918 This Section considers:

- 1919 ➤ Approaches to determination of efficacy
- 1920 ➤ Human challenge trials
- 1921 ➤ Preliminary and confirmatory (pivotal) efficacy trials
- 1922 ➤ Design and conduct of efficacy trials, including control groups
- 1923 ➤ Approaches to determination of vaccine effectiveness

1924

1925 **6.1 Approaches to determination of efficacy**

1926

1927 6.1.1 Human challenge trials

1928

1929 In some settings it may be useful and appropriate to obtain an initial assessment of vaccine
1930 efficacy from human challenge trials in which vaccinees are deliberately exposed to an infectious
1931 agent in a controlled setting. Human challenge trials are not always feasible or appropriate, as
1932 discussed in Appendix 1. When they can be performed, human challenge trials have potential to
1933 streamline and so accelerate vaccine development. They may be of particular use:

- 1934 ○ When there is no appropriate nonclinical model (e.g. when a candidate vaccine is
1935 intended to protect against an infectious disease that is confined to humans).
- 1936 ○ When there is no known immunological correlate of protection.
- 1937 ○ When vaccine efficacy trials (as described above and in detail in the sections that follow)
1938 are not feasible.

1939

1940 Like all model systems human challenge trials have limitations in terms of their relevance to
1941 natural infection and their ability to predict protection under very variable circumstances (e.g. in
1942 terms of time elapsed between vaccination and exposure to a pathogen and the impact of
1943 pathogen dose on development of clinically apparent infection). Nevertheless, they may suffice
1944 to rule out vaccines or doses that seem unlikely to have useful protective efficacy and to select
1945 the most promising formulations and regimens for further trial. See Appendix 1 for further
1946 information.

1947

1948 Later on in the clinical development program, usually after safety and immunogenicity trials
1949 have identified one or more potentially effective vaccination regimens for further evaluation,
1950 vaccine efficacy may be assessed against naturally acquired infectious disease.

1951

1952 6.1.2 Preliminary efficacy trials

1953

1954 Based on the available safety and immunogenicity data it may be considered appropriate to
1955 evaluate vaccine efficacy initially in dose-finding trials (which may include different doses
1956 and/or different numbers of doses or dose intervals) or in small-scale trials that evaluate a single
1957 vaccination regimen before proceeding to confirmatory (pivotal) trials.

1958

1959 Whenever possible the general features of these trials (such as case definitions and method of
1960 case ascertainment) should resemble those expected to be applied in confirmatory trials of
1961 efficacy. However, it is sometimes the case that preliminary efficacy trials are used to inform the
1962 final design of confirmatory efficacy trials. For example:

- 1963 ○ By applying various case definitions the results may be used to identify or refine the most
1964 appropriate case definition for confirmatory trials.
- 1965 ○ By exploring efficacy in specific subgroups in preliminary trials the confirmatory trials
1966 may be designed to ensure adequate numbers of cases per subgroup of interest.
- 1967 ○ The method of case ascertainment used may be assessed for feasibility in larger trials
1968 with a greater number of, and more geographically widespread, trial sites.
- 1969 ○ The immunogenicity and efficacy data may be used to support a provisional assessment
1970 of potential correlates of protection.

1971

1972 If the candidate vaccine is intended to prevent a severe and/or life-threatening infectious disease
1973 for which there is no, or at least no very satisfactory, vaccine already available, individual NRAs
1974 may agree to accept an initial application for licensure based on one or more preliminary efficacy
1975 trial or trials. In these cases it is essential that sponsors and NRAs should discuss and agree the
1976 main features of the design of the trials before initiation, including the sample size, so that,
1977 subject to promising results, the data may be considered robust and sufficient.

1978

1979 The availability of a vaccine licensed on the basis of preliminary efficacy data has potentially
1980 important implications for the acceptability and feasibility of initiating or completing
1981 confirmatory efficacy trials that include a control group that does not receive active vaccination.
1982 These issues should be discussed between NRAs and sponsors so that expectations for provision
1983 of confirmatory efficacy data are agreed prior to the start of any trials that could potentially
1984 support initial licensure.

1985

1986 6.1.3 Confirmatory (pivotal) efficacy trials

1987

1988 A single confirmatory vaccine efficacy trial or more than one trial may be conducted, depending
1989 on considerations described in Subsection 6.2 below.

1990

1991 In pivotal efficacy trials, the primary objective is usually to estimate vaccine efficacy over a pre-
1992 defined time frame after completion of the primary vaccination schedule, which may comprise
1993 one or more doses. Confirmatory trials may evaluate a single or more than one vaccination
1994 regimen and may or may not include evaluations of efficacy before and after booster doses. As
1995 applicable to the individual candidate vaccine, a range of secondary efficacy objectives may be
1996 defined although the trial will not be formally powered for these analyses.

1997

1998 **6.2 Design and conduct of efficacy trials**

1999

2000 The protective efficacy of a vaccine against a specific infectious disease is usually defined as the
2001 reduction in the chance of developing the disease after vaccination relative to the chance when
2002 not vaccinated as determined in a prospective randomized controlled trial. Vaccine efficacy (VE)
2003 is therefore derived from the proportionate reduction in disease attack rate (AR) between the
2004 control group that did not receive vaccination against the infectious disease potentially
2005 preventable by the candidate vaccine (ARU) and the vaccinated (ARV) group(s). VE can be
2006 calculated from the relative risk (RR) of disease among the vaccinated group as $(ARU-$
2007 $ARV/ARU) \times 100$ and $(1-RR) \times 100$.

2008

2009 Much less often, vaccine efficacy may be determined in a prospective randomized trial in which
2010 the efficacy of the candidate vaccine is compared to that of a licensed vaccine intended to
2011 prevent the same infectious disease.

2012

2013 The following sections consider issues that apply to both types of trial, including some specific
2014 trial designs that may be considered along with some issues for analysis of the data. Details of
2015 statistical methodologies are beyond the scope of this guidance and only broad principles are
2016 described.

2017

2018 6.2.1 Selection of trial sites

2019

2020 Vaccine efficacy trials require the presence of a sufficient burden of clinical disease to enable
2021 estimates to be obtained from feasible numbers of subjects and within a reasonable timeframe.

2022 The infectious disease to be prevented may occur at sufficiently high rates to enable efficacy
2023 trials to be conducted only in confined areas. Even when the disease to be prevented is more
2024 widespread, it may be necessary to confine efficacy trials to specific affected areas for reasons
2025 that may include feasibility of dealing with multiple NRAs and ethics committees, need to ensure
2026 adequacy of monitoring and desire to accumulate representative numbers of cases due to specific
2027 serotypes or subtypes.

2028

2029 Sponsors may have to conduct feasibility assessments to accurately ascertain clinical disease
2030 rates in various age subgroups of populations before selecting trial sites. Any nationally-
2031 recommended non-vaccine-related preventive measures that are in place (e.g. prophylactic drug
2032 therapy in high risk individuals or settings, use of insect repellents and bed nets) should be
2033 identified and the trial should be conducted against a background of these additional
2034 interventions.

2035

2036 Trial sites need to be sufficiently accessible to allow regular monitoring visits. Sponsors may
2037 have to engage in site capacity building exercises prior to trial initiation, including training of
2038 study personnel, and may need to provide essential infrastructure to support the trial (e.g. to
2039 ensure that there are adequate blood collection and processing facilities, refrigeration facilities

2040 suitable for the vaccine and/or sera, competent laboratories, data handling capacity and
2041 communication methods to allow electronic randomization schemes, rapid reporting of safety
2042 data or other trial issues to the sponsor).

2043

2044 6.2.2 Candidate (test) vaccine group(s)

2045

2046 If previous data do not support selection of a single dose or regimen of the candidate vaccine for
2047 assessment of efficacy, trials may include one or more groups in which subjects receive the
2048 candidate vaccine (e.g. more than one dose or schedule may be evaluated). In some instances one
2049 or more placebo doses may need to be interspersed with candidate vaccine doses to enable
2050 matching of all regimens under trial in a double-blind design (e.g. if 2 or 3 doses of the candidate
2051 vaccine are to be compared with the control group).

2052

2053 6.2.3 Control (reference) group(s)

2054

2055 Control groups comprise all subjects who do not receive the candidate vaccine. Usually only one
2056 control group is enrolled in any one trial. On occasion, it may be considered important to include
2057 more than one of the possible types of control groups that are discussed below.

2058

2059 *6.2.3.1 Control groups not vaccinated against the infectious disease to be prevented*

2060

2061 In most cases vaccine efficacy trials employ a control group that does not receive vaccination
2062 against the disease to be prevented by the candidate vaccine. In double-blind trials the control
2063 group may receive:

2064

- 2065 ○ A true placebo (i.e. material without any pharmacological activity). This has the advantage
2066 of providing safety data against a control that has no pharmacologically active components.
2067 However, the use of an injectable placebo may not be acceptable to one or more of NRAs,
2068 ethics committees, investigators, trial subjects or their parents/guardians at least in some age
2069 groups (e.g. there may be particular objections raised against true placebo injections in

2070 infants). In contrast, there is usually no objection to use of a true placebo when the
2071 candidate vaccine is administered orally or by nasal installation.

2072

2073 ○ If a true placebo is not acceptable to one or more of the above interested parties the control
2074 group may receive a licensed vaccine that has no effect on the infectious disease to be
2075 prevented by the candidate vaccine but may have some benefit for recipients. In some cases
2076 both licensed vaccine and placebo doses may have to be used to match the candidate vaccine
2077 regimen. Due to distinctive visual characteristics or markings on presentations of licensed
2078 vaccines it may not be possible to wholly maintain double-blind conditions. In this case
2079 those site staff who prepare and/or administer trial vaccines should not otherwise be
2080 involved in trial conduct. Difficulties may also arise if the candidate vaccine is injected in a
2081 different fashion (i.e. subcutaneous, intradermal, intramuscular) to the only suitable licensed
2082 vaccine(s) that could be given to controls. In this case it may be possible to screen the
2083 administration site to prevent vaccine recipients and care-givers observing the specific
2084 method of injection.

2085

2086 ○ A licensed vaccine that has an effect on the infectious disease to be prevented only when due
2087 to some of the total serotypes or subtypes in the candidate vaccine. In this case the licensed
2088 vaccine provides a control group that is not vaccinated against the additional types in the
2089 candidate vaccine (i.e. unshared types).

2090

2091 If there are major objections to use of placebo injections but there is no potentially beneficial
2092 licensed vaccine that would be suitable for the target age group, the control group may be
2093 randomized to receive no vaccine. This is an undesirable situation and should be regarded as a
2094 last resort since it precludes the use of any form of blinding of trial personnel or participants
2095 (including care-givers).

2096

2097 *6.2.3.2 Control groups vaccinated against the infectious disease to be prevented*

2098

2099 In this case the control group receives a vaccine that is already licensed to prevent the same
2100 infectious disease as the candidate vaccine. This approach is used when it is not acceptable to

2101 employ a control group that is not vaccinated against the infectious disease to be prevented
2102 because there is at least one available licensed efficacious vaccine that is recommended for use
2103 in areas where the disease occurs.

2104

2105 On occasion, the control group receives a vaccine that may prevent the same infectious disease
2106 as the candidate vaccine but only when due to some of the total serotypes or subtypes in the
2107 candidate vaccine. Therefore the control group is vaccinated against the shared types but is not
2108 vaccinated against the unshared types.

2109

2110 If there is more than one licensed vaccine that could be used it is important that selection of the
2111 control vaccine takes into account the available evidence supporting its efficacy and, if relevant,
2112 whether it appears to have similar efficacy against all serotypes or subtypes of the pathogen
2113 involved. It is also necessary to discuss the choice of comparator with NRAs in countries where
2114 the sponsor will seek a licence for the candidate vaccine to ascertain the acceptability of an
2115 estimate of relative efficacy against a product that may be unlicensed or, at least, not the product
2116 in widespread use. This is especially important if one multi-country pivotal trial will be
2117 conducted, in which case the same vaccine should be given to the control group at all trial sites.
2118 If it is not possible to use the same control vaccine in all regions where efficacy is to be
2119 evaluated consideration should be given to conducting different efficacy trials with different
2120 vaccines used in the control groups.

2121

2122 On occasion, there may be at least one licensed vaccine available in one or more countries to
2123 prevent the same infectious disease as the candidate vaccine but there may be other countries in
2124 which the disease of interest occurs in which:

- 2125 ○ No such vaccine is yet licensed and/or
- 2126 ○ No such vaccine is included in the routine immunization schedule and/or
- 2127 ○ There are sound reasons to consider that no licensed vaccine is likely to provide useful
2128 efficacy (e.g. because the licensed vaccine does not cover or is known/expected to have
2129 poor efficacy against the serotypes or subtypes that are most prevalent in a specific
2130 region).

2131 In these situations, after careful consideration by all interested parties (i.e. sponsor, NRAs, ethics

2132 committees, local public health authorities and investigators) it may be deemed appropriate to
2133 use a control group that is not vaccinated against the disease to be prevented.

2134

2135 6.2.4 Trial designs

2136

2137 *6.2.4.1 Randomization*

2138

2139 The unit of randomization is most often the individual. Alternatives include the household or the
2140 cluster under trial (e.g. a school population or a local community). Randomization of groups or
2141 clusters rather than individuals may be preferred:

- 2142 ○ When a vaccination program is to be conducted in a geographical area or community
- 2143 ○ When it is logistically easier to administer the vaccine to groups than to individuals
- 2144 ○ When vaccination is anticipated to reduce transmission of the infectious agent

2145

2146 *6.2.4.2 Types of trial design*

2147

2148 The absolute protective efficacy of a vaccine is most commonly assessed in prospective
2149 randomized trials that compare rates of clinically apparent disease (e.g. an acute clinical illness)
2150 or established infection (e.g. chronic infection that is known to predispose to serious clinical
2151 disease) between a candidate vaccine group and a control group.

2152

2153 The simplest design involves randomization of equal numbers of subjects to each of the
2154 candidate vaccine group and the control group (i.e. 1:1). In trials that employ a control group that
2155 is not vaccinated against the disease to be prevented but there are clinical data already available
2156 to strongly support the likely efficacy of a candidate vaccine, it may be appropriate (subject to
2157 statistical considerations and an assessment of the impact on the total trial sample size) to use
2158 unbalanced randomization to reduce the chance that subjects will be randomized to the control
2159 group (e.g. 2:1 or 3:1 so that the majority of trial subjects receive the candidate vaccine).

2160

2161 Trials may plan to follow up trial subjects for the primary efficacy endpoint for a fixed period of
2162 time after the last dose of the primary series. The time at which the primary analysis is conducted

2163 is based both on the anticipated rate of occurrence of the primary efficacy endpoint in the control
2164 group and the feasibility of retaining subjects on trial for prolonged periods. Alternatively, based
2165 on anticipated rates of the primary efficacy endpoint in the control group and an expected or
2166 minimum desirable level of efficacy of the candidate vaccine, a case-driven approach may be
2167 taken. In this design the primary analysis is conducted once a pre-specified number of total cases
2168 (i.e. in a double-blind setting based on the anticipated numbers in test and control group required
2169 to demonstrate the projected vaccine effect) has been detected.

2170

2171 Alternative designs that allow for a comparison with a control group that is not vaccinated
2172 against the disease to be prevented, at least in the short-term, may include (but are not limited to)
2173 the following:

2174

2175 i) In a step-wedge trial the candidate vaccine is administered to pre-defined groups in a
2176 sequential fashion. Each pre-defined group is a unit of randomization. These may be
2177 geographical groups or groups defined by host factors (e.g. age) or other factors (e.g. attendance
2178 at a specific school or resident within a specific healthcare catchment area). Such a design may
2179 be chosen when there is good reason to anticipate that the vaccine will do more good than harm
2180 (affecting the equipoise associated with randomization to a control group that is not vaccinated
2181 against the disease to be prevented) and/or when it is impossible to deliver the intervention
2182 simultaneously to all trial participants. This design may also be used to evaluate vaccine
2183 effectiveness (see Subsection 6.3).

2184

2185 ii) In a ring vaccination trial the direct contacts of a case, and sometimes secondary contacts,
2186 may be randomized to vaccine or control or may be randomized to receive immediate
2187 vaccination or vaccination after a delay period (20). This type of pre-exposure cohort trial
2188 usually requires smaller sample sizes than prospective randomized controlled trials. The trial
2189 design assumes that there is an equal chance of vaccinees and non-vaccinees being infected and
2190 developing the infectious disease as a result of contact with an index case.

2191

2192 These types of trials may be particularly applicable when the infectious disease to be prevented
2193 is associated with a relatively high incidence of secondary cases in susceptible populations.

2194 Therefore the use of this trial design requires prior knowledge of the infectivity of the infectious
2195 agent and proportion of infections that are clinically apparent as well as the general susceptibility
2196 of the trial population.

2197

2198 The follow-up period for subjects after contact with the index case should cover the upper limit
2199 of the incubation period, taking into account the period during which the index cases were
2200 infectious and the contact period. The inclusion period for new cases and controls and their
2201 contacts should be set at a maximum of six months following the detection of the first case.
2202 Inclusion over a longer period may introduce bias in favour of vaccine efficacy, because the
2203 exposure to the infecting pathogen and thus the risk of infection will be reduced in the
2204 vaccinated groups or clusters compared with that in groups or clusters that are not vaccinated
2205 against the disease to be prevented.

2206

2207 iii) There are some situations in which the vaccine is not intended, or at least not primarily
2208 intended, to protect the vaccinees themselves against a clinically apparent infectious disease. The
2209 most common example is the vaccination of mothers during the last trimester of pregnancy,
2210 when IgG most efficiently crosses the placenta, to protect the infant during the early months of
2211 life (see Subsection 5.6.4). This strategy may or may not be followed by active immunization of
2212 infants, provided that suitable vaccines exist. If vaccine efficacy is measured in infants the unit
2213 of randomization is the mother.

2214

2215 6.2.5 Clinical endpoints

2216

2217 Preliminary efficacy trials may have an objective to identify the primary and/or secondary
2218 endpoints for confirmatory trials. Therefore the primary endpoint in preliminary efficacy trials
2219 may be different to that selected for confirmatory efficacy trials.

2220

2221 6.2.5.1 Primary endpoints

2222

2223 In most instances, the focus of vaccine efficacy trials is on the prevention of clinically apparent
2224 infections that fit the primary case definition based on clinical and laboratory criteria. The

2225 primary endpoint is also usually defined by the timeframe in which the case occurred in relation
2226 to dosing.

2227

2228 If an organism is able to cause a range of infections (e.g. from life-threatening invasive
2229 infections to common infections that are not serious if adequately treated), the primary endpoint
2230 in any one trial should be carefully selected in accordance with the proposed indication(s).

2231

2232 A candidate vaccine may contain antigens derived from one or several types (serotypes, subtypes
2233 or genotypes) of the same species. It is also possible that there may be some potential for cross-
2234 protection against types not included in the vaccine (e.g. as observed with rotavirus vaccines and
2235 human papilloma virus vaccines). For these types of vaccines it is usual that the primary
2236 endpoint comprises cases due to any of the types included in the vaccine and the trial is powered
2237 for this composite endpoint. It is not usually possible to power the trial to formally assess
2238 efficacy against individual types in the vaccine or to assess cross-protection against types not in
2239 the vaccine.

2240

2241 Alternative primary endpoints may include:

- 2242 ○ Clinical manifestations of latent infection (e.g. herpes zoster)
- 2243 ○ Established chronic infections that may be asymptomatic but predispose to infection-related
2244 disease later in life (e.g. chronic hepatitis B infection; persistent infection with HPV)
- 2245 ○ Other markers that predict progression to clinically apparent disease (e.g. histological changes
2246 that are established pre-cursors of malignant neoplasia)

2247

2248 *6.2.5.2 Secondary endpoints*

2249

2250 As applicable to the individual candidate vaccine and the definition of the primary endpoint,
2251 important secondary endpoints may include:

- 2252 • Cases that occur after each dose, when the vaccine schedule includes multiple doses
2253 and/or a booster
- 2254 • Cases due to each of the individual types of the species included in the vaccine

- 2255 • Cases due to the species (i.e. regardless of whether caused by types that are and are not
2256 included in the candidate vaccine)
- 2257 • Cases due to non-vaccine types
- 2258 • Cases according to host factors (e.g. age, region)
- 2259 • Cases meeting various criteria reflecting disease severity
- 2260 • Duration and/or severity of the illness, which may include clinical (e.g. duration of
2261 fever or rash) and laboratory measurements (e.g. duration of shedding)

2262

2263 In accordance with Subsection 5.4, one important secondary objective should be to attempt to
2264 identify a correlate of protection or, at least, a threshold value.

2265

2266 There are no vaccines indicated for the prevention or interruption of carriage, implying an effect
2267 on transmission. In addition, there are no vaccines indicated for prevention of transmission.
2268 Eradication of carriage and/or reduction in disease transmission that is not directly linked to
2269 and/or accompanied by a clinical benefit of vaccination to the individual is not usually
2270 considered to be sufficient to support licensure. Sponsors contemplating trials in which these are
2271 primary endpoints are advised to consult widely with NRAs.

2272

2273 6.2.6 Case definition

2274

2275 As part of the pre-defined primary efficacy endpoint the protocol should describe the clinical and
2276 laboratory criteria that must be met to define a case.

- 2277 ○ If a case is a clinically apparent infection it is essential that the definition includes core
2278 clinical features. It should also list acceptable sampling and laboratory processing
2279 methods to confirm the presence of the target pathogen and/or to detect infection by
2280 serological findings.

- 2281 ○ If the endpoint is the result of infection (e.g. evidence of persistence of infection or a
2282 histological change) then details of sampling (frequency and method) and grading (if
2283 applicable) should be included.

2284

2285 Adequate case definitions should also be provided for secondary endpoints. For example, if the

2286 primary endpoint is all clinically apparent infections due to the types in the vaccine the
2287 secondary analyses may focus on cases that meet specific criteria for severity, cases that require
2288 medical contact or hospitalization and cases that are due to organism types not actually included
2289 in the vaccine.

2290

2291 Whenever possible, centralized laboratories should be used and standard shipping procedures
2292 should be established for samples. If this is not feasible then information on assay performance
2293 between laboratories should be obtained and presented. The sensitivity, specificity and
2294 reproducibility of all the methods used should be included in the trial reports. If no well-
2295 validated methods for establishing infection and/or progression of infection exist during the
2296 period of pre-licensure clinical development then experimental laboratory methods could be
2297 used. It would usually be expected that these experimental methods are validated before using
2298 them to analyse specimens obtained during the pivotal trials.

2299

2300 See Subsection 4.1.2 regarding the use of an adjudication committee.

2301

2302 6.2.7 Case ascertainment

2303

2304 It is critical that the same methodology for case detection is applied in all treatment groups and
2305 throughout the duration of the trial. Active case ascertainment usually requires frequent
2306 monitoring and contact with vaccinees or their care-givers. Passive case ascertainment is usually
2307 based on vaccinees or care-givers presenting to or otherwise contacting a local healthcare facility
2308 due to the onset of specific symptoms. In this case it is common that contact is triggered by one
2309 or more of a list of signs or symptoms given to trial subjects or their care-givers at the time of
2310 randomization and they may be instructed to contact a specific healthcare facility. Alternatively
2311 or in parallel, cases may be detected based on monitoring all local clinics and hospitals for cases.

2312

2313 For efficacy endpoints based on clinically apparent disease, the possible range of clinical
2314 presentations will determine the mode of case ascertainment. For example, this may be hospital-
2315 based for cases of life-threatening infections or community based for less severe infections. If
2316 community based, case detection may depend on family practitioners and on first suspicion of

2317 infection by vaccinated subjects themselves or their parents/guardians. In each case, it is
2318 critically important that the individuals who are most likely to initiate detection of a possible
2319 case should have clear instructions. These may need to cover issues such as criteria for
2320 stimulating contact with designated healthcare professionals, telephone contacts, initial
2321 investigations and further investigations once a case is confirmed.

2322

2323 For efficacy endpoints other than clinically apparent disease, it becomes critical that subjects are
2324 monitored at regular intervals to detect clinically non-apparent infections or changes in other
2325 selected markers (e.g. the appearance of histological changes). The frequency of visits, and
2326 acceptable windows around the visits, should be laid down in the trial protocol and must be
2327 carefully justified.

2328

2329 The appropriate period of case ascertainment during a trial requires special attention and will be
2330 determined mainly by the characteristics of the disease to be prevented and the claim for
2331 protection that is sought at the time of initial authorization. For infectious diseases that have
2332 marked seasonality, at least in some geographic locations, it is usual to plan for a primary
2333 analysis at least when all vaccinees have been followed through one complete season. In these
2334 settings it is usual to conduct an enrolment campaign over a very short period just before the
2335 expected season onset. However, it may be necessary to repeat the exercise before the next
2336 season to meet the pre-defined sample size, in which case the opportunity should be taken to
2337 collect all cases that occur in the second season for the initial vaccination campaign cohort.

2338

2339 6.2.8 Duration of follow-up

2340

2341 At the time of conducting the primary analysis for the purposes of obtaining initial licensure, the
2342 duration of follow-up in vaccine efficacy trials may be relatively short (e.g. 6-12 months) and
2343 insufficient to detect waning protection, if this exists. Therefore, case ascertainment should
2344 continue in the vaccine efficacy trial populations and/or waning protection should be assessed
2345 during post-licensure effectiveness trials. These data may serve to indicate the need for and
2346 optimal timing of booster doses and to estimate efficacy after booster doses.

2347

2348 6.2.9 Analysis of efficacy

2349

2350 *6.2.9.1 Sample size calculation*

2351

2352 The trial sample size should be calculated based on:

- 2353 i. The selected primary efficacy endpoint, including the possibility that the primary
2354 endpoint may be a composite of cases due to any of the organism types included in
2355 the candidate vaccine;
- 2356 ii. The primary analysis population (see below) and
- 2357 iii. According to the primary hypothesis (i.e. superiority or non-inferiority and the pre-
2358 defined criteria).

2359

2360 If the primary analysis population represents a subset of the total randomized population the
2361 sample size calculation should include an adequate estimation of numbers likely to be excluded
2362 from the primary analysis for various reasons. In addition, if considered necessary, a blinded
2363 review of total numbers enrolled who are eligible for the primary analysis population may be
2364 conducted after a pre-defined number has been randomized so that the trial sample size can be
2365 adjusted accordingly.

2366

2367 *6.2.9.2 Analysis populations*

2368

2369 Clinical efficacy is usually assessed in the total randomized trial population (i.e. those who are
2370 assigned to receive vaccine and/or control) and in pre-defined subsets of the randomized
2371 population.

2372

2373 In maternal immunization trials of clinical efficacy it may be appropriate that trials are powered
2374 to assess vaccine efficacy only in the offspring. If a secondary or exploratory analysis is
2375 conducted in mothers the case definition will likely need to be different.

2376

2377 The pre-defined trial populations should include as a minimum:

- 2378 ○ All randomized subjects (i.e. the full analysis set)

- 2379 ○ All vaccinated subjects regardless of the numbers of assigned doses actually received and
2380 whether or not they were administered within the pre-defined windows
- 2381 ○ Subsets of all vaccinated subjects separated according to any evidence of prior exposure
2382 to the infectious disease under trial (e.g. baseline seropositivity vs. seronegativity)
- 2383 ○ The *per protocol* population should be confined to subjects who have generally complied
2384 with the protocol and have received all assigned doses within pre-defined windows. In
2385 addition, this population should be confined to those with no evidence of prior
2386 exposure to the infectious agent (or specific serotypes or subtypes) at baseline.
2387 Depending on the target pathogen this subset may also be defined based on prior
2388 vaccination history.

2389

2390 Other populations may be appropriate for some pre-defined secondary or exploratory analyses.

2391 For example:

- 2392 ○ Those who completed specific numbers of assigned doses or received all doses within
2393 pre-defined windows around the scheduled trial visits, i.e. analyses of efficacy according
2394 to adherence to the vaccination regimen
- 2395 ○ Subgroups defined by demographic factors known or postulated to impact on vaccine
2396 efficacy

2397

2398 6.2.9.3 Primary analysis

2399

2400 It is common in vaccine efficacy trials that the pre-defined primary analysis is based on
2401 estimating efficacy in the *per protocol* population and on rates of true vaccine failures, i.e. the
2402 calculation of efficacy takes into account only those cases with onset after a minimum time had
2403 elapsed after completion of the assigned doses. For example, depending on knowledge of the
2404 kinetics of the immune response, true vaccine failures may be limited to cases with onset more
2405 than a specified number of days or weeks after the final dose of the primary series. In addition,
2406 for a vaccine that contains antigens from only certain serotypes or subtypes, the primary analysis
2407 may be based on cases due to vaccine types only.

2408

2409 In trials that compare a candidate vaccine with a group that is not vaccinated against the disease

2410 to be prevented the aim is to demonstrate that the lower bound of the 95% confidence interval
2411 around the estimate of vaccine efficacy is above a pre-defined percentage (which will always be
2412 above zero). The pre-defined percentage should be selected based on the sponsor's expectation
2413 of the point estimate of vaccine efficacy and taking into account what might be viewed as the
2414 minimum level of efficacy that could be considered clinically important. The sample size
2415 calculation is based on this objective.

2416

2417 In trials that compare a candidate vaccine with an active control the aim is to demonstrate non-
2418 inferiority of the candidate vs. the control vaccine, with calculation of the 95% confidence
2419 intervals around the difference in rates of breakthrough infections. This requires a pre-defined
2420 non-inferiority margin, which should be justified in accordance with prior estimates of vaccine
2421 efficacy for the disease to be prevented, and level of alpha on which the sample size calculation
2422 depends. If the sponsor also intends to assess superiority of the candidate vaccine over the active
2423 control the statistical analysis plan should pre-define a hierarchical assessment so that superiority
2424 is assessed only after establishing that the non-inferiority has been demonstrated.

2425

2426 *6.2.9.4 Other analyses*

2427

2428 The full range of secondary and exploratory analyses will depend on the pre-defined endpoints.
2429 Some of these analyses may be conducted in specific predefined trial populations. For example,
2430 important sensitivity analyses to support the primary analysis include those based on all proven
2431 cases whenever they occurred after randomization and in each analysis population. If the
2432 schedule includes more than one dose then analyses should be conducted that count cases from
2433 the time of each dose for all subjects who were dosed up to that point.

2434

2435 If the primary analysis was confined to cases due to organism types included in the vaccine then
2436 additional analyses should evaluate efficacy based on all cases regardless of the serotype or
2437 subtype responsible. If there are sufficient numbers of cases, these analyses may provide some
2438 indication of any cross-protection provided by the antigens in the vaccine.

2439

2440 Depending on the case definition, other analyses may be based on cases that met some but not all

2441 of the case definition criteria, cases that were severe and cases that required a medical
2442 consultation or hospitalization.

2443

2444 *6.2.9.5 Other issues*

2445

2446 Vaccines that contain antigens derived from several serotypes, subtypes or genotypes

2447

2448 As discussed in Section 4.3.5, it is not usually possible to power the trial to formally assess
2449 efficacy against individual types in the vaccine. Secondary or, at least, exploratory analyses
2450 should be planned to describe efficacy against the various types represented in the vaccine and, if
2451 there is an expectation of cross-protection, against types not included. If the data suggest
2452 unusually low efficacy against any type in the vaccine it may be necessary to explore this matter
2453 in further trials.

2454

2455 Magnitude of vaccine efficacy

2456

2457 The point estimate of vaccine efficacy and 95% confidence intervals that are obtained may
2458 indicate that a relatively modest proportion of cases can be prevented. This fact alone does not
2459 preclude licensure provided that the sponsor can substantiate that the vaccine efficacy observed
2460 represents an important clinical benefit. For example, if the vaccine prevents life-threatening
2461 infections for which there is no very effective specific therapy and for which no vaccine or no
2462 more effective vaccine is available.

2463

2464 Extrapolation of vaccine efficacy

2465

2466 Vaccine efficacy can only be estimated in geographical areas where there is sufficient disease to
2467 support trial feasibility. In most instances it is not necessary for any one NRA to request
2468 provision of efficacy data from within its own jurisdiction nor is it feasible to conduct a study
2469 that provides robust results within a single country. Any such requests should only be made
2470 when there are scientifically sound reasons to think that vaccine efficacy could be substantially
2471 lower compared to that observed in the areas where Phase 3 trials were conducted. In addition,

2472 such requests should not be made if there is a good scientific justification to use immunobridging
2473 to support extrapolations of efficacy between populations (see Section 5 on bridging efficacy).

2474

2475 **6.3 Approaches to determination of effectiveness**

2476

2477 Vaccine effectiveness reflects direct (vaccine induced) and indirect (population related)
2478 protection during routine use. Thus, the assessment of vaccine effectiveness can provide useful
2479 information in addition to any pre-authorization estimates of protective efficacy. Even if it was
2480 not feasible to estimate the protective efficacy of a vaccine pre-authorization it may be possible
2481 and highly desirable to assess vaccine effectiveness during the post-authorization period. The
2482 information gained from assessments of vaccine effectiveness may be particularly important to
2483 further knowledge on the most appropriate mode of use of a vaccine (e.g. need for booster doses
2484 in at least some segments of the population to maintain adequate protection over time).

2485

2486 Vaccine effectiveness may be estimated:

2487 i) In observational cohort trials that describe the occurrence of the disease to be prevented in
2488 the target population over time. However, there is no randomization step and there is the
2489 potential for considerable biases to be introduced. One such approach is the screening
2490 method.

2491 ii) During phased (e.g. in sequential age or risk groups) introduction of the vaccine into the
2492 target population in which the groups might form the units of randomization (i.e. using a
2493 stepped wedge design).

2494

2495 iii) Using other designs, of which a wide range has been used in different circumstances. For
2496 example, using a case test-negative trial design. In this modification of a case control trial
2497 subjects with symptoms suggesting the infectious disease under trial and seeking medical
2498 care are tested for the infectious agent of interest. The cases are those who are positive and
2499 controls are those who are negative for the pathogen of interest. If vaccinated cases are less
2500 severely ill and seek care less frequently than cases that occur in individuals not vaccinated
2501 against the disease to be prevented, then an appropriate adjustment for illness severity is
2502 required to avoid bias in effectiveness estimates (21).

2503

2504 Vaccine effectiveness is affected by a number of factors, including:

- 2505 ○ Vaccination coverage of the population
- 2506 ○ Pre-existing immune status of the population
- 2507 ○ Differences in types included in a vaccine compared to predominant circulating types
- 2508 ○ Changes in circulating predominant types over time
- 2509 ○ Transmissibility of the pathogen and any effect that introduction of routine vaccination
2510 may have had on transmission rates

2511

2512 It may not be possible or appropriate for sponsors to conduct trials to estimate vaccine
2513 effectiveness themselves since regional or national networks may be necessary to ensure that
2514 cases are reliably detected. For some types of disease the use of data collected by means of
2515 national or international registries may be appropriate. In addition, in some jurisdictions the
2516 estimation of vaccine effectiveness is not considered to fall within the remit of the license holder.

2517

2518 Whatever the local requirements and arrangements, sponsors should discuss the arrangements for
2519 ongoing disease surveillance and the potential for estimating effectiveness with public health
2520 authorities in countries where the vaccine is to be used and where appropriate surveillance
2521 systems are in place. The plans for estimation of effectiveness should also be agreed with NRAs
2522 at the time of licensure and the requirements for reporting of effectiveness data to the NRA
2523 either via the sponsor or directly from a public health authority should be clarified.

2524

2525 It may be that reliable estimates of effectiveness can only be obtained in certain countries in
2526 which vaccination campaigns are initiated and where there is already a suitable infrastructure in
2527 place to identify cases. Therefore, it would likely be inappropriate to extrapolate any estimates of
2528 effectiveness that are obtained to other modes of use (such as introducing the same vaccine to
2529 different or only to highly selected sectors of the population).

2530

2531 **7. Safety**

2532

2533 This Section considers:

- 2534 ➤ Evaluating safety in clinical trials
- 2535 - Safety as a primary or secondary endpoint
- 2536 - Recording and categorisation of adverse events within trials
- 2537 - Size of the pre-licensure safety database
- 2538 ➤ Post-licensure safety surveillance
- 2539 - Spontaneous reporting
- 2540 - Roles of the license holders and NRAs

2541

2542 **7.1 General considerations**

2543

2544 Safety should be assessed in all clinical trials that are conducted pre- or post-licensure. The
2545 assessment of safety may be the only primary objective, a co-primary objective or a secondary
2546 objective in a clinical trial. Since the methods for collection, analysis and interpretation of safety
2547 data during clinical trials contrast with those applicable to post-licensure routine safety
2548 surveillance they are considered separately.

2549

2550 In principle, many of the approaches to documenting and reporting safety data during clinical
2551 trials and the conduct of pharmacovigilance activities for vaccines are similar to those for all
2552 medicinal products. The sections that follow should be read in conjunction with the extensive
2553 guidance that is available from many publications and on the websites of WHO, CIOMS, the
2554 ICH and individual regulatory bodies. The focus of the sections is on some methods and
2555 practises that are different for vaccines compared to other medicinal products and on some issues
2556 that may need to be addressed due to the vaccine composition.

2557

2558 **7.2 Assessment of safety in clinical trials**

2559

2560 As described in Subsection 4.1.2 the use of a DSMB should be considered before commencing
2561 clinical trials. If the DSMB's role includes recommending early termination of a trial there
2562 should be appropriate stopping rules in place.

2563

2564 **7.2.1 Safety as a primary or secondary endpoint**

2565

2566 7.2.1.1 *Safety as a primary endpoint*

2567

2568 In the early clinical trials with a new candidate vaccine the assessment of safety may be the only
2569 primary objective or a co-primary objective. It is very unusual that the assessment of safety is a
2570 primary objective in pre-licensure trials conducted later in the development program. Where this
2571 has occurred the focus has been on a specific safety issue (e.g. intussusception in pre-licensure
2572 trials with rotavirus vaccines that were developed after the first vaccine had indicated a potential
2573 association with vaccination). The assessment of one or more safety aspects is the primary
2574 objective in post-licensure safety trials, which involve detailed monitoring during routine
2575 immunization programs.

2576

2577 When the assessment of safety is the primary objective of a clinical trial it is usual that the
2578 primary analysis is based on a specific safety endpoint (e.g. rates of a certain adverse event [AE],
2579 rates of AEs within a specific system organ class [SOC] or rates of AEs that may be part of a
2580 clinical syndrome of interest). These trials should be powered to address the pre-specified
2581 hypothesis. The exception is in trials that are exploratory in nature, such as initial trials with new
2582 candidate vaccines intended to provide a preliminary assessment of the safety of ascending doses
2583 or sequential doses.

2584

2585 7.2.1.2 *Safety as a secondary endpoint*

2586

2587 In vaccine efficacy trials and in immunogenicity trials the assessment of safety is usually a
2588 secondary objective. These trials are not powered *a priori* to support formal statistical
2589 conclusions from analyses of rates of all or specific AEs between trial groups but simple
2590 statistical comparisons are commonly used as an initial screening for any differences in rates
2591 between groups of subjects. If such analyses are conducted they should be pre-specified in the
2592 protocol and in the statistical analysis plan. If there are any findings indicating statistically
2593 significant differences in rates of AEs (overall, by SOC or by PT) they need to be interpreted
2594 with caution due to the fact that the trial was not primarily designed to address pre-specified
2595 hypotheses regarding safety endpoints. Nevertheless, the findings may indicate that it is

2596 appropriate to design and power further pre- or post-licensure clinical trials to further investigate
2597 and quantify the potential risks.

2598

2599 7.2.2 Recording and reporting adverse events

2600

2601 *7.2.2.1 Methods*

2602

2603 Adverse events and serious adverse events (SAEs) should be reported and recorded by
2604 investigators and sponsors according to detailed procedures described in the trial protocol and in
2605 accordance with requirements for expediting reporting to NRAs.

2606

2607 In safety and immunogenicity trials it is usually expected that all AEs, whether solicited or
2608 unsolicited, are collected for defined periods after each dose from all randomized subjects or all
2609 randomized subjects who received at least one dose of assigned treatment (see Subsections
2610 7.2.2.2 and 7.2.2.3). In vaccine efficacy trials involving large numbers of subjects, taking into
2611 account the safety profile observed in the previous trials and the numbers from which detailed
2612 safety data have already been obtained, it may be acceptable that all AEs are collected from a
2613 randomized subset. In this case all SAEs and any pre-specified adverse events of special interest
2614 (AESIs) should be collected from all randomized subjects. It may also be acceptable that only
2615 SAEs and AESIs are collected during long-term safety follow-up.

2616

2617 *7.2.2.2 Solicited signs and symptoms*

2618

2619 After each dose of a vaccine or placebo, local and systemic solicited signs and symptoms should
2620 be documented for a pre-defined post-dose period by vaccinees or their care-givers by
2621 completing a daily diary record. These diaries should be filled in each day and users should
2622 receive instructions in their completion before vaccination commences. The duration of
2623 collection of data in diaries should be at least 5-7 days after each dose but longer periods (e.g.
2624 10-14 days) may be appropriate for vaccines that contain live micro-organisms, depending on
2625 whether or not they are replication-competent.

2626

2627 For injectable vaccines the local signs and symptoms to be documented are usually pain, redness
2628 and swelling in all age groups. When two or more vaccines are given by injection at the same
2629 time, the diary card should ensure that separate data are recorded for each injection site (for
2630 example, these are usually into different limbs and therefore the diary card should contain
2631 separate records by right and left arm and/or leg). For vaccines given by other routes, alternative
2632 local signs and symptoms may be identified as representing local AEs (e.g. sneezing after
2633 intranasal dosing). The systemic signs and symptoms are determined by the age range in the trial
2634 (e.g. those appropriate for infants will not be wholly applicable to toddlers and older subjects)
2635 and the route of administration (e.g. nausea and vomiting could be solicited symptoms for
2636 vaccines given orally).

2637

2638 For subjective symptoms (e.g. pain, fatigue, myalgia) a simple scoring system should be
2639 included in the diaries to allow for a grading of severity. For objective signs, the quality of the
2640 information collected can be improved by methods such as issuing digital thermometers to each
2641 vaccinee or care-giver for application at a specific site (e.g. oral or axillary in infants, with
2642 recordings made at specific time of the each day) and using transparent plastic measuring
2643 devices to record the extent of redness and swelling.

2644

2645 Any self-administered treatments used to address signs or symptoms (such as antipyretic and
2646 analgesic medicines) and whether there was any contact with, or treatment administered by, a
2647 healthcare professional should be captured. If a supply of a specific anti-pyretic or analgesic was
2648 given out at the time of each dose for use as needed, or as instructed in accordance with the
2649 protocol, the post-dose usage recorded in the diary should be checked against returned supplies.
2650 If prior safety data suggest that pre-vaccination antipyretic use is appropriate, this can be
2651 administered and recorded by trial staff at the vaccination visit and the diary cards should collect
2652 any post-vaccination doses administered.

2653

2654 At each trial visit, whether it involves face-to-face or telephone contact between the vaccinee
2655 and/or care-giver and trial staff, the diary cards should be checked for level of completion and
2656 further instructions given as needed to improve data recording after the next dose is given. At
2657 face-to-face visits the prior vaccination site(s) should be inspected for any remaining signs such

2658 as induration. Also, vaccinees or care-givers should be asked about the maximum extent of signs
2659 (e.g. to determine whether whole limb swelling occurred). Any unresolved local or systemic
2660 signs and symptoms should be recorded and action taken as appropriate.

2661

2662 *7.2.2.3 Unsolicited AEs*

2663

2664 In addition to signs and symptoms that are pre-specified for collection of data, vaccinees and/or
2665 their care-givers should be questioned at each trial visit for the occurrence of any AEs since the
2666 last visit. For each AE the timing of onset in relation to vaccination, whether a healthcare
2667 professional was consulted, whether hospitalisation occurred and any treatment that was given
2668 (prescribed or non-prescribed) should be captured. Sponsors may also wish to record any days
2669 off school or off work for vaccinees and days off work for their care-givers.

2670

2671 A checklist of symptoms that could possibly reflect the onset of a pre-specified AESI may be
2672 useful to identify potential cases of various syndromes (such as auto-immune diseases) at an
2673 early stage and to ensure that there is careful follow-up. In addition, questions should be posed to
2674 elicit whether certain AEs have occurred that could be anticipated in the age group studied. For
2675 example, to determine whether persistent inconsolable crying or hypotonic hypo-responsive
2676 episodes occurred in infants. Where well-established and widely-applied definitions of these and
2677 other AEs are available, the reports received should be classified using these criteria.

2678

2679 Although solicited signs and symptoms are AEs, it is usual that clinical trial reports tabulate
2680 safety data separately for these and for unsolicited AEs. The classification of AEs should use a
2681 standardised scheme, such as MedDRA, to categorise AEs by SOC and PT. If the classification
2682 scheme is updated during conduct of the trial the clinical trial report should indicate how the
2683 changes impact on the tabulations.

2684

2685 *7.2.2.4 Other investigations*

2686

2687 The collection of data on routine laboratory tests (haematology, chemistry and urinalysis) is not
2688 commonly perceived to be necessary in clinical trials with vaccines. If the sponsor or NRA

2689 considers that there is a good rationale for obtaining these data at certain time points the results
2690 should be generated in appropriately certified laboratories and reported using well-established
2691 grading scales for abnormalities.

2692

2693 For vaccines that contain live organisms (including attenuated wild-types, organisms that have
2694 been genetically engineered to render them non-virulent and/or non-replicative and live viral
2695 vector vaccines) additional investigations related to safety should usually include the detection of
2696 viraemia and assessments of shedding (quantity and duration). Organisms recovered from
2697 vaccinees may also be subjected to genetic analyses to determine any instances of recombination
2698 with wild types and reversion to virulence and/or replication competency.

2699

2700 In the case of vaccines administered to pregnant women measures of growth and development in
2701 their infants may be important safety parameters.

2702

2703 7.2.3 Categorization of adverse events

2704

2705 *7.2.3.1 Causality*

2706 Section 8.5 of the WHO Global Manual on Surveillance of Adverse Events Following
2707 Immunization (22) recommends that in clinical trials the investigator should make a judgement
2708 of relatedness to vaccination for all solicited signs and symptoms and unsolicited AEs. The
2709 investigator's assessment may also be commented on by the sponsor. The assessment of
2710 relatedness to vaccination should take into account factors such as:

2711 a) Plausibility of relatedness, taking into account the vaccine construct. For example, live
2712 attenuated vaccines may be associated with modified manifestations of natural infection
2713 (e.g. rashes).

2714 b) Timing in relation to dosing. Whilst most vaccine-related AEs occur within 1-2 weeks after
2715 a dose there may reasons to suspect that illnesses with onset many months after the last dose
2716 could be related to prior vaccination. For example, for some powerful adjuvants there is a
2717 hypothetical concern that rates of auto-immune diseases may increase in genetically-
2718 predisposed sub-populations.

- 2719 c) Concurrent illnesses common in the trial age group or documented in the case report form
2720 and the anticipated background rates, if known. This is a particular issue for vaccines
2721 administered to infants and young children in whom intercurrent illnesses are relatively
2722 common.
- 2723 d) The frequency with which any one AE occurred in groups that received the candidate
2724 vaccine compared to groups that received another vaccine or placebo.
- 2725 e) Any correlation between rates of any one AE and dose of antigenic components.
- 2726 f) Changes in rates of any one AE with sequential doses.
- 2727 g) The results of medical investigations (e.g. diagnostic tests for concurrent illnesses) and of
2728 autopsies (e.g. in cases of sudden infant death).

2729

2730 7.2.3.2 *Severity*

2731

2732 Sufficient data should be collected for each solicited sign and symptom and unsolicited AE to
2733 make an assessment of severity. Wherever possible widely used grading scales should be used
2734 and/or the same scales should be applied throughout the clinical development program.

2735

2736 7.2.3.3 *Other categorization*

2737

2738 The classification of AEs as serious and the categorisation of frequencies should follow
2739 internationally-accepted conventions, as described in Section 3.1.2 of the WHO Global Manual
2740 on Surveillance of Adverse Events Following Immunization (22). Frequencies of solicited signs
2741 and symptoms by subject and of AEs in each treatment group should be calculated based on the
2742 denominator of all vaccinated subjects in that group. Frequencies of solicited signs and
2743 symptoms after each dose should use the number that received each dose.

2744

2745 7.2.4 AE reporting rates within and between trials

2746

2747 During any one clinical development program the reporting rates for all and/or for specific types
2748 of AEs, whether solicited or unsolicited, in clinical trials may demonstrate:

2749

2750 i) Differences between candidate vaccines and control groups within a clinical trial. For
2751 example, differences in AE rates may be anticipated between a candidate vaccine and a
2752 placebo group or a group that receives a licensed vaccine that does not have a similar
2753 composition to the candidate vaccine. Any marked differences between a candidate vaccine
2754 and a licensed vaccine that has the same or very similar composition are generally not
2755 anticipated and may require further investigation.

2756
2757 ii) Differences between clinical trials that may be observed in one or both of the candidate
2758 vaccine and control groups for total or specific AE reporting rates. Whenever this occurs it
2759 is important to consider the possible explanations, taking into account whether or not the
2760 same effect on the pattern of reporting rates is observed in groups that receive candidate
2761 vaccines and licensed vaccines and whether the study was double-blind or open-label. These
2762 differences between trials may reflect real and anticipated differences in vaccine
2763 reactogenicity between trial populations (e.g. age-related differences for specific AEs, such
2764 as higher fever rates in trials conducted in infants and toddlers compared to those in older
2765 children and adults). In contrast, marked differences in reporting rates between trials
2766 conducted in similar age ranges but in different geographical locations would not usually be
2767 anticipated. When there is no clear explanation for the differences observed, consideration
2768 should be given to the possibility that there has been incomplete reporting of AEs and
2769 further investigation is merited.

2770

2771 **7.3 Size of the pre-licensure safety database**

2772

2773 A total database of 3000 subjects across all trials and populations provides a 95% chance of
2774 observing one instance of an AE that occurs on average in 1 in 1000 subjects. This number may
2775 be regarded as a generally applicable target for the minimum total pre-licensure safety database
2776 for a new candidate vaccine that contains one or more antigenic components not previously used
2777 in human vaccines. Nevertheless, this figure should not be applied to application dossiers for any
2778 type of new candidate vaccine without further considerations, which include the following:

2779 a. Fewer than 3000 subjects may be acceptable if the new candidate vaccine consists only of
2780 antigenic components already licensed in other vaccines for which there is considerable

- 2781 experience in routine use.
- 2782 b. The total number exposed in clinical trials may cover many age sub-groups or a single age
2783 group may predominate. It may be acceptable that the majority of subjects included in the
2784 safety database come from a specific age range unless the available data point to some
2785 specific safety concerns that require further investigation in other age groups before
2786 licensure.
- 2787 c. For specific types of vaccines (e.g. innovative constructs) or specific modes of use (e.g. in a
2788 population considered to be vulnerable or otherwise at high risk that could predispose them
2789 to certain adverse events) individual NRAs may require that considerably more than 3000
2790 subjects are exposed prior to initial licensure.
- 2791 d. Additional considerations may apply to vaccines that contain antigenic components not
2792 previously used in human vaccines but for which efficacy trials are not possible. A large
2793 pre-licensure safety database is highly desirable for a vaccine with potential to be
2794 administered to very large numbers in an emergency situation (e.g. influenza pandemic
2795 vaccines, vaccines against certain viral haemorrhagic fevers or smallpox vaccines).
2796 Nevertheless, the safety profile documented in the initial safety and immunogenicity trials
2797 may lead to some reluctance to unnecessarily expose large numbers of subjects in the
2798 absence of an immediate threat and/or to expose large numbers in particular population
2799 subsets. Therefore NRAs may consider licensing these types of vaccines based on a
2800 relatively small safety database provided that very detailed plans are in place at the time of
2801 licensure for monitoring of safety should it be necessary to give the vaccine to large
2802 numbers of individuals at some future time.

2803

2804 **7.4 Post-licensure safety surveillance**

2805

2806 The requirements of individual NRAs for reporting of safety data collected from post-licensure
2807 safety surveillance activities should be consulted. NRAs should provide publicly-available
2808 guidance regarding their requirements for the content and timing of periodic reports of safety
2809 data and for any expedited reporting considered necessary. License holders should demonstrate
2810 that they have adequate capability and appropriate staff to collect, interpret and act upon the
2811 safety data received.

2812

2813 It has become routine that at the time of initial licensure there are detailed proposals in place for
2814 post-licensure safety surveillance activities, often in the form of risk management plans. These
2815 documents and proposals are then routinely updated at intervals in line with additional data that
2816 become available. They usually outline the safety specification for the vaccine based on all
2817 available safety data at the time of submitting each version of the plan along with details of
2818 routine and proposed additional pharmacovigilance and risk minimisation activities.

2819

2820 When planning pharmacovigilance activities for a vaccine, it is important to take into account
2821 that in addition to routine pharmacovigilance (i.e. passive surveillance), important information
2822 may come from:

2823 i) Data from enhanced safety surveillance (active surveillance) put in place by public health
2824 bodies when a vaccine is introduced into a national routine immunization program or when
2825 the use of a vaccine within a program changes significantly (e.g. an entirely different age
2826 group is vaccinated for the first time).

2827 ii) Large databases that link information in patient records on vaccination history with
2828 occurrence of specific types of illness. These can be interrogated to explore links between
2829 specific vaccines and safety issues in the short and longer-term.

2830 iii) Various types of registries intended to capture details of use in specific populations. For
2831 example, there are registries that collect information on exposure of pregnant women to
2832 various types of vaccines and the outcome of the pregnancy (including rates of spontaneous
2833 abortion, premature delivery and congenital malformations in the infants). There are also
2834 registries that capture specific types of disease that could be of relevance to specific types of
2835 vaccines.

2836

2837 The limitations of each of these approaches are well known, which underlines the need to
2838 consider all sources along with additional data that may come from post-licensure trials.

2839

2840 As with other medicinal products the same vaccine may be marketed by different license holders
2841 in various countries and regions so that systems need to be in place at the time of licensure to
2842 facilitate rapid sharing of safety information between companies, between companies and NRAs

2843 and between NRAs. An additional consideration for vaccines is that when a safety signal is
2844 identified for any one vaccine it may or may not be possible to ascribe the AEFIs observed to
2845 any one antigenic component of the vaccine or to an adjuvant. Furthermore, if there was
2846 concomitant administration of vaccines in some or all cases generating the signal it may not be
2847 possible to ascribe the AEFI to only one of the products co-administered. The same or very
2848 similar antigenic component(s) or adjuvant in the vaccine(s) from which the signal arose may be
2849 in several other licensed products marketed worldwide. Ultimately several different companies
2850 and NRAs without established data sharing agreements may need to be involved. As a result, the
2851 actions taken, if any, and the speed at which action has been taken, are sometimes very variable
2852 between countries. These issues underscore the need for efficient use of electronic databases to
2853 facilitate rapid data sharing.

2854

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3011

3012 **Appendix 1. Human Challenge Trials**

3013

3014 There are many reasons a developer might wish to conduct with humans a “challenge-
3015 protection” study that might normally be conducted in animals. Animal models are often quite
3016 imprecise in reflecting human disease and many infectious organisms against which a
3017 developer might wish to develop a vaccine are species-specific for humans. Human Challenge
3018 Trials may be safely and ethically performed in some cases, if properly designed and
3019 conducted. Tremendous insight into the mode-of-action and the potential for benefit in the
3020 relevant species, humans, may be gained from challenge trials. However, there are also
3021 limitations to what challenge trials may be able to ascertain, because like animal model
3022 challenge-protection studies, a human challenge trial represents a model system. Because there
3023 are often such significant limitations to animal models however, the model system of the
3024 human challenge trial may significantly advance, streamline, and/or accelerate vaccine
3025 development (1).

3026

3027 It will be important to consider the regulatory framework where the human challenge trial may
3028 be conducted, because in some countries, challenge stocks are expected to be handled in the
3029 same manner as vaccines and to be studied under a Clinical Trial Authorization (Approval,
3030 CTA), whether or not an investigational vaccine is to be used in the same clinical investigation
3031 protocol. For example, a challenge trial might be conducted to titrate the challenge organism in
3032 humans before using the challenge in a vaccine study, in order to know the proper dose of the
3033 challenge organism to give and to characterize the symptoms, kinetics, shedding,
3034 transmissibility, and so forth to expect from the challenge. In such cases (when challenge
3035 should be studied under CTA), there is greater clarity about regulatory expectations, including
3036 quality of the challenge stock to be used, as the CTA regulations or requirements would apply.
3037 However, in many countries, because the challenge stock is not itself a medicinal product, such
3038 studies would not be under the purview of the NRA’s review and approval and much less
3039 clarity exists on regulatory expectations and quality matters in such cases. Ideally, a challenge
3040 stock should match in quality terms what is expected of an investigational vaccine at the same
3041 clinical Phase of development (understanding that a pathogenic challenge strain will not have
3042 the “safety” of a hopefully innocuous vaccine). Likewise, ideally a human challenge study

3043 should match the same expectations for conduct of a vaccine study, e.g., compliance with
3044 GCP, approval of a CTA. However, there may not exist a regulatory framework to promulgate
3045 such expectations in the country where the challenge study is to be conducted. Thus, it may be
3046 necessary for regulators to consider and develop an appropriate regulatory pathway or
3047 framework for the quality of the challenge stock and the conduct of the challenge study, when
3048 clarity is not apparent in their existing system. This may require new legislation to give
3049 regulators the necessary authority, and it is encouraged that regulators should have this
3050 authority. Trial sponsors, vaccine developers, researchers, and so on should determine from the
3051 relevant NRA what regulatory expectations they may have when clarity does not exist, if the
3052 human challenge study is intended to support the development of a vaccine candidate they
3053 would like to ultimately license (i.e. gain marketing authorization).

3054

3055 It is also important to note that not all diseases for which vaccines might be developed are
3056 suitable to consider conducting human challenge trials. In many cases, human challenge with a
3057 virulent or even a potentially attenuated organism would not be considered ethical or safe. For
3058 example, if an organism causes a high case fatality rate (or there is a long and uncertain latency
3059 period) and there are no existing therapies to prevent or ameliorate disease and preclude death,
3060 then it would not be appropriate to consider human challenge trials with such an organism.
3061 However, when the disease an organism causes has an acute onset and can be readily and
3062 objectively detected and existing efficacious treatments (whether curative or palliative) can be
3063 administered at an appropriate juncture in disease development to prevent significant
3064 morbidity (and eliminate mortality), a human challenge trial might be considered.

3065

3066 **1. Purposes of human challenge trials**

3067 A developer may conduct human challenge trials to accomplish one or more of a number of
3068 aims. The aims of the study determine what clinical Phase the study may be considered to be.
3069 Human challenge trials are often a type of efficacy study, but not all would be considered a
3070 “Phase 3” study. Purposes of human challenge trials could include one or more of the
3071 following:

- 3072 • Characterization of the challenge stock and model system: titration, symptoms, kinetics,
3073 shedding, transmissibility, etc.

- 3074 • Clearer understanding of pathogenesis of and immunity to the organism in order to guide
3075 decisions on what (type and/or quantity) immune responses a vaccine might need to
3076 accomplish in order to protect against that disease, i.e. insight for vaccine design (studies for
3077 this purpose may be referred to as experimental medicine studies)
- 3078 • Identification of potential immune correlates of protection (ICP, which would then require
3079 validation in a traditional efficacy study)
- 3080 • Identification of optimal trial design for Phase 3 traditional efficacy trial(s), e.g. case
3081 definitions, endpoints, study design aspects
- 3082 • Generation of appropriate hypotheses to be formally tested in traditional efficacy trials
- 3083 • Proof-of-concept that a particular vaccine candidate might be capable of protection or not
- 3084 • Down- or Up-selection among various potential lead vaccine candidates to advance only the
3085 best to large Phase 2b or Phase 3 efficacy trials and to eliminate those that are unworthy of
3086 advancement
- 3087 • De-risk or “left-shift”¹ risk of failure in a vaccine development program
- 3088 • Comparison of vaccine performance in endemic settings vs. in efficacy trial population²,
3089 including evaluating impact of prior immunity
- 3090 • Support emergency use of an investigational vaccine, e.g. in a pandemic
- 3091 • Basis for licensure (this purpose would generally be an exception rather than the rule)
- 3092 • Exploration post-licensure whether immunity to vaccination wanes and if or when booster
3093 doses might be required for durable protection³
- 3094 • Others

3095 Not all situations would support accomplishing each of the aims above. For example, if the
3096 human challenge model system does not adequately mimic the wild-type disease and situation
3097 in which a vaccine would need to protect, then a human challenge trial would not be usable as
3098 a basis for licensure. But, it might still serve well one or more of the other purposes above. It

¹ When looking at a timeline of vaccine development graphed from early to the left and late to the right, shifting the risk of failure earlier in the timeline, or left, could result in significant cost (and resource)-savings and minimize lost opportunity costs by abandoning an unpromising candidate before taking greater expenditures from higher phase clinical trials, not to mention minimizing risk to human subjects by not conducting large efficacy studies of vaccines that would not prove efficacious

² Target population in a particular country may have a higher rate of individuals with e.g., sickle cell trait or different nutritional status or greater parasitic load in “normal” flora, any of which might affect immune responsiveness and thus, efficacy, compared to the efficacy trial population

³ This might entail challenge study in adults to extrapolate when children might need booster doses

3099 might even be considered by regulators as supportive of licensure, but not a sole or primary
3100 basis.

3101

3102 **2. Purpose influences study design, which influences regulatory use and decision-making**

3103 Obviously, the aim of the human challenge trial guides its study design. Consequently, even
3104 for the same disease, the challenge model may vary depending on the purposes and design of
3105 the study to be conducted. In some cases (e.g. to serve as a basis for licensure or to identify
3106 appropriate efficacy trial design and case definitions), the challenge model might need to
3107 mimic as closely as feasible wild-type disease. In other cases, consideration might be given to
3108 use of an attenuated challenge organism (e.g., an earlier but under-attenuated vaccine
3109 candidate) or a model system in which objective early signs (e.g. parasitaemia, viraemia)
3110 signaling onset of disease symptoms, which could trigger initiation of treatment to prevent
3111 actual disease onset or morbidity.

3112

3113 Another important consideration for a human challenge model system would be its positive
3114 and negative predictive utility. If used for down-selection or de-risking, the negative predictive
3115 utility of the model to identify vaccine candidates that would not warrant advancement into
3116 large human efficacy studies should be high. If intended to be used for licensure, the positive
3117 predictive utility of the model system would need to be nearly as compelling and credible as a
3118 traditional efficacy trial might be. Thus, the purpose of the study would influence the design,
3119 which would in turn influence the conclusions about and the decisions that might be made
3120 from the study results.

3121

3122 **3. Some key ethical considerations**

3123 Ethics in clinical trials, as in medicine, follow the precept of “do no harm.” By their nature
3124 (intentionally infecting humans with disease-causing organisms), human challenge trials would
3125 seem to fly in the face of this basic precept. Further, clinical trials should be designed and
3126 conducted in a manner that minimizes risks to human subjects while maximizing the potential
3127 to benefit. Consideration must be given both to potential individual risks and benefits, as well
3128 as to potential societal benefits (and risks, such as release into the environment of a pathogen
3129 that might not otherwise be present). Provisions in clinical trial ethics are made for situations

3130 in which there may be greater than minimal risk but no (or little) potential for individual
3131 benefit, but when knowledge may be gained to the benefit of the larger societal population
3132 with whom the potential trial participant shares significant characteristics. Justification for
3133 asking trial participants to accept the risk from a challenge may take some considerations from
3134 the justifications that support inclusion of placebos in controlled clinical trials.

3135

3136 Acknowledgement is due to the reality that some individuals are greater risk-takers than others,
3137 while some individuals are quite risk-averse and would not be accepting of the risk of
3138 receiving a challenge. Key to asking individuals to accept the risk from a challenge study in
3139 which they may not expect to receive individual benefit is the element of informed consent.
3140 Adults may consent when they are well-informed and understand what risks they are accepting
3141 to take, even if those risks may be considerably greater than minimal (e.g. accepting that they
3142 will develop an acute, but manageable, disease that will resolve but in the meantime may cause
3143 considerable morbidity, e.g. severe diarrhea managed with fluid and electrolyte replacement).
3144 Thus, in appropriate situations, it can be considered ethical to ask informed adults to consent to
3145 volunteer and participate in a human challenge trial whether they will receive an
3146 investigational vaccine that may or may not protect them from the challenge organism, a
3147 placebo that will not protect them, or only the challenge organism itself. However, accepting
3148 such risks requires absolutely the elements of voluntary consent based on truly being informed.
3149 It is for this reason (need for truly informed consent), consideration of conducting human
3150 challenge studies in children or any other vulnerable population, who would have diminished
3151 capacity to give informed consent, would not be deemed acceptable at this time.

3152

3153 The need to minimize risks to subjects in clinical trials calls for due consideration to whether
3154 or not the challenge organism need be pathogenic or not, or to what degree. As stated above,
3155 the aim or purpose of the study may drive this decision, but the ethics of minimizing to the
3156 extent feasible within the frame of sound science any risks to human subjects should also bear
3157 due consideration in this regard. It should also be obvious that the credibility of the data to
3158 support regulatory decision-making need be taken into account.

3159

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