

ABSTRACT

Natalizumab is an effective immunosuppressive therapy for multiple sclerosis that received its initial FDA approval in 2004. Its most notable toxicity is progressive multifocal leukoencephalopathy (PML), an opportunistic infection that is the focus of an FDA mandated Registry (the Tysabri Outreach Commitment to Health (TOUCH) Outcomes Registry). The Southern Network on Adverse Reactions identified a fatal case of Natalizumab associated urethral melanoma and undertook an extensive evaluation of all cases of Natalizumab-associated melanoma included in the FDA's Adverse Event Reporting System (FAERS) (between 2005 and 2014). Characteristics of these patients and report quality were analyzed. Report quality was based on a 15 point scale of various components. The mean patient age at the time of diagnosis of melanoma was 46 (s.d. 11). Seventeen patients were diagnosed with cutaneous melanoma developing in non-sun-exposed areas. We found that cases reported through the TOUCH registry were of lower quality (mean score 7.7) compared to others that reported outside of the USA (mean score 8.5, $p < .008$). Our findings suggest that in the United States, the TOUCH Registry should be expanded to require clinicians to report details of Natalizumab-associated melanoma, an opportunistic illness that frequently develops in immunocompromised persons. Also, the FDA-approved product label for Natalizumab should be revised to include information on occurrences of melanoma among Natalizumab-treated MS patients, particularly those who have cutaneous nevi prior to Natalizumab initiation. Natalizumab-treated MS patients and their physicians should be vigilant for changes in nevi appearances and development of new cutaneous lesions (particularly in non-sun-exposed cutaneous areas).

BACKGROUND

- Melanoma is the most dangerous form of skin cancer and affected over 76,000 people in 2014¹
- There are 3 types of melanoma: cutaneous, mucosal and ocular
 - Cutaneous is the most common melanoma²
- Natalizumab (Tysabri) is a monoclonal antibody designed to block $\alpha 4$ integrins and is given to Multiple Sclerosis (MS) patients³
- Progressive Multifocal Leukoencephalopathy (PML) is a serious and generally fatal infection of the central nervous system caused by the John Cunningham (JC) virus in immunocompromised patients⁴
- 3 fatal cases of PML were identified after the 2004 FDA approval causing the drug to be voluntarily removed from the United States market in 2005⁵
- In 2006 Natalizumab was put back on the United States market with a Risk Management program, Tysabri Outreach Commitment to Health (TOUCH), in place⁶
 - Anyone in the United States who is prescribed Natalizumab must be registered with the TOUCH program
 - TOUCH is designed to catch early cases of PML and opportunistic infections
- A SONAR investigator identified a 34 year old female with urethral melanoma shortly after Natalizumab administration in 2014
- SONAR undertook a comprehensive investigation to follow up on this safety concern and evaluated all FDA reported cases of melanoma and Natalizumab
- Focus of the investigation is the characterization of these patients and the completeness and quality of the reports

OBJECTIVES

- To characterize Natalizumab treated patients who developed melanoma
- To determine the completeness and quality of reports
- To determine the differences between cases reported through the TOUCH system and those that did not

METHODS

Data Source

- FDA Adverse Events Reports and Medwatch Reports
- Patient, treatment, outcome and melanoma characteristics were taken from the reports and put into a dataset for analysis

Classification of Melanoma

- Site
 - defined as cutaneous, mucosal or ocular
- Sun exposure
 - defined by primary site location and if it is exposed to the sun using scales from previous work^{7,8}

Quality Score

- A 15 point quality score was developed for individual cases
 - Demographics
 - 4 points total
 - If age, race, gender and country were given
 - Pharmacy
 - 3 points total
 - If Natalizumab start date, duration of treatment and melanoma treatment were given
 - Clinical
 - 8 points total
 - If melanoma site, lymph node status, Breslow depth, pre-existing nevi, family history of melanoma, prior immunosuppressive treatment given, survival and start date of melanoma were given

TOUCH Reporting Indication

- United States Cases
 - Heavy TOUCH (case reported through the TOUCH system)
 - Light TOUCH (case reported outside the TOUCH system but used information from TOUCH)
 - No TOUCH (case reported outside the TOUCH system and no information from the TOUCH registry was used)
- Outside the United States
 - No TOUCH

Analysis

- Descriptive statistics for characteristics of patients
- Statistically significant pair-wise comparisons between TOUCH groups (generalized $p < 0.05$) were identified using Univariate Optimal Discriminant Analysis1(UniODA) and are presented for every attribute (column 1). For each unique application UniODA identifies the model (column 3) that predicts observations' actual class membership (column 2) with maximum accuracy normed against chance. This is accomplished by explicitly maximizing (optimizing) the effect strength for sensitivity (ESS) statistic: for each unique application, ESS=0 is the level of classification accuracy expected by chance, and ESS=100 is perfect, errorless classification. ESS is a measure of how accurately the model classifies observations' actual class category status across the sample, and it is invariant over base rate. While the ESS and the effect strength for predictive value (ESP) statistics are normed in the same manner, ESP is a measure of how accurately the model makes point predictions regarding the class membership status of individual observations, and it varies as a function of base rate. Monte Carlo simulation using Fisher's randomization algorithm is used to estimate the exact Type I error rate.⁹

RESULTS

| | Total N=139 | US N=97 (70%) | Non-US N=42 (30%) |
|---|----------------|------------------|----------------------|
| Quality Score | | | |
| Total [median (Q1, Q3)] max=15 | 8.5 (7, 10) | 8.5 (7, 10) | 8.5 (7.5, 9.5) |
| Clinical [median (Q1, Q3)] max=8 | 3 (2.5, 4.5) | 3 (2.5, 4.5) | 3.5 (2.5, 4) |
| Pharmacy [median (Q1, Q3)] max=3 | 2.5 (2, 3) | 2.5 (2, 3) | 2.5 (2, 3) |
| Demographics [median (Q1, Q3)] max=4 | 3 (3, 3) | 3 (3, 3) | 3 (3, 3) |
| Age (median [range])* | 46 [21, 74] | 47 [21, 74] | 39 [21, 63] |
| Number of updates (median)* | 2 | 2 | 1 |
| Number of months of information from melanoma diagnosis (median) | 5 | 5 | 5 |
| Gender N (%) | | | |
| Male | 31 (22) | 22 (23) | 9 (21) |
| Female | 108 (78) | 75 (77) | 33 (79) |
| Disease Natalizumab prescribed N(%) | | | |
| Multiple Sclerosis | 137 (98) | 95 (98) | 42 (100) |
| Crohns | 1 (1) | 1 (1) | 0 |
| Not Known | 1 (1) | 1 (1) | 0 |
| Melanoma Site N (%) | | | |
| Cutaneous | 106 (76) | 75 (77) | 31 (74) |
| Mucosal | 2 (1) | 2 (2) | 0 |
| Ocular | 5 (4) | 3 (3) | 2 (5) |
| Not Known | 26 (19) | 17 (18) | 9 (21) |
| Site Sun Exposed N (%) | | | |
| Yes | 88 (63) | 63 (65) | 25 (60) |
| No | 25 (18) | 18 (19) | 7 (17) |
| Not Known | 26 (19) | 16 (16) | 10 (24) |
| Time on drug until Melanoma Diagnosis N (%)* | | | |
| 0-24 months | 44 (32) | 33 (34) | 11 (26) |
| 25-48 months | 23 (17) | 11 (11) | 12 (29) |
| 49-72 months | 10 (7) | 4 (4) | 6 (14) |
| 73-96 months | 2 (1) | 2 (2) | 0 |
| not specified | 60 (43) | 47 (49) | 13 (31) |
| Alive at follow up N (%) | 130 (94) | 90 (93) | 40 (95) |
| Concomitant drug use N (%) | 51 (37) | 32 (33) | 19 (45) |
| Melanoma Treatment N (%) | | | |
| Chemotherapy | 2 (1) | 2 (2) | 0 |
| Chemotherapy and radiation | 1 (1) | 1 (1) | 0 |
| Surgery | 92 (66) | 63 (65) | 29 (69) |
| Radiation | 1 (1) | 0 | 1 (2) |
| Surgery combination | 9 (6) | 9 (9) | 0 |
| Other | 3 (2) | 2 (2) | 1 (2) |
| no | 1 (1) | 0 | 1 (2) |
| Not applicable | 19 (14) | 12 (12) | 7 (17) |
| Unknown | 11 (8) | 8 (8) | 3 (7) |
| TOUCH N (%) | | | |
| Heavy | N/A | 20 (20) | 0 |
| Light | N/A | 54 (56) | 0 |
| None | N/A | 23 (24) | 42 (100) |
| Nevi history N (%) | | | |
| Yes | 25 (18) | 16 (16) | 9 (21) |
| No | 40 (29) | 24 (25) | 16 (38) |
| Unknown | 74 (53) | 57 (59) | 17 (41) |
| Change in Nevi N (%) | | | |
| Yes | 22 (16) | 14 (14) | 8 (19) |
| No | 117 (84) | 83 (86) | 34 (81) |
| Reporter N (%)* | | | |
| Neurologist | 40 (29) | 28 (29) | 12 (29) |
| Unknown | 23 (17) | 9 (9) | 14 (33) |
| Patient | 19 (14) | 19 (20) | 0 |
| Nurse | 17 (12) | 16 (17) | 1 (2) |
| Physician | 10 (7) | 3 (3) | 7 (17) |
| Family | 5 (4) | 5 (5) | 0 |
| Registered Nurse | 5(4) | 5 (5) | 0 |
| Investigator | 6 (4) | 1 (1) | 5 (12) |
| Physician Assistant | 2 (1) | 2 (2) | 0 |
| ANSM | 2 (1) | 0 | 2 (5) |
| Health Care Professional | 2 (1) | 2 (2) | 0 |
| Consumer | 2 (1) | 2 (2) | 0 |
| Doctor | 1 (1) | 1 (1) | 0 |
| Manufacturer Report | 1 (1) | 1 (1) | 0 |
| Other Authority | 1 (1) | 0 | 1 (2) |
| Assistant | 1 (1) | 1 (1) | 0 |
| Infusion Nurse | 1 (1) | 1 (1) | 0 |
| Nurse Practitioner | 1 (1) | 1 (1) | 0 |

Table 1: Characteristics of Natalizumab treated melanoma population: * indicates statistically significant difference between USA and Non-USA group

| Variable | TOUCH Group Comparison | Predict Indicated TOUCH Group if | N | % Accurately Identified | ESS | % Correct Predictions | ESP |
|-----------------------------|------------------------|----------------------------------|----|-------------------------|------|-----------------------|------|
| Melanoma Site* | Heavy TOUCH | Site =0 | 20 | 40 | 35.4 | 88.9 | 52.5 |
| | No TOUCH USA | Site >0 | 22 | 95.4 | | 63.6 | |
| Family History of Melanoma* | Heavy TOUCH | Site =0 | 20 | 40 | 27 | 53.3 | 33 |
| | Light TOUCH | Site >0 | 54 | 87 | | 79.7 | |
| | Heavy TOUCH | History =0 | 20 | 100 | 21.7 | 52.6 | 52.6 |
| | No TOUCH USA | History > 0 | 23 | 21.7 | | 100 | |
| Pre-Existing Nevi (PEN)* | Heavy TOUCH | History = 0 | 20 | 100 | 24.1 | 32.8 | 32.8 |
| | Light TOUCH | History > 0 | 54 | 24.1 | | 100 | |
| | Heavy TOUCH | History ≤ 0.5 | 20 | 100 | 23.8 | 38.5 | 38.3 |
| | No TOUCH Non-USA | History = 1 | 42 | 23.8 | | 100 | |
| Clinical Score* | Heavy TOUCH | PEN ≤ 0.25 | 20 | 90 | 27 | 34.6 | 25.5 |
| | Light TOUCH | PEN > 0.25 | 54 | 37 | | 90.9 | |
| Number of Updates* | Heavy TOUCH | PEN ≤ 0.25 | 20 | 90 | 26.4 | 39.1 | 28 |
| | No TOUCH Non-USA | PEN > 0.25 | 44 | 36.4 | | 88.9 | |
| | Heavy TOUCH | Clinical Score ≤ 2.5 | 20 | 50 | 31.5 | 50 | 31.5 |
| | No TOUCH Non-USA | Clinical Score > 2.5 | 54 | 81.5 | | 81.5 | |
| Age* | Heavy TOUCH | Clinical Score ≤ 2.75 | 20 | 70 | 39 | 51.9 | 34.8 |
| | No TOUCH Non-USA | Clinical Score > 2.75 | 42 | 69 | | 82.9 | |
| | Heavy TOUCH | Updates > 1 | 20 | 75 | 32.1 | 45.4 | 28.2 |
| | No TOUCH Non-USA | Updates < 1 | 42 | 57.1 | | 82.8 | |
| Months of Information* | Light TOUCH | Updates > 1 | 54 | 79.6 | 36.8 | 70.5 | 39.1 |
| | No TOUCH Non-USA | Updates < 1 | 42 | 57.1 | | 68.6 | |
| | Light TOUCH | Age > 39 | 50 | 76 | 27.4 | 67.9 | 28.4 |
| | No TOUCH Non-USA | Age < 39 | 37 | 51.4 | | 61.3 | |
| Age* | No TOUCH USA | Age > 40 | 22 | 90.9 | 45 | 54.1 | 45 |
| | No TOUCH Non-USA | Age < 40 | 37 | 54.1 | | 90.9 | |
| | Light TOUCH | Months > 0 | 54 | 94.4 | 25.4 | 63.8 | 45 |
| | No TOUCH Non-USA | Months = 0 | 42 | 31 | | 81.2 | |

Table 2: Bivariate TOUCH-Category UniODA Comparisons: * indicates statistical significance

| Sun Exposure | United States N(%) | Non-United States N(%) | Total |
|--------------|--------------------|------------------------|---------|
| yes | 63 (84) | 25 (81) | 88 (83) |
| no | 12 (16) | 5 (16) | 17 (16) |
| unknown | 0 | 1 (3)** | 1(1)** |

** source is unconfirmed skin for metastasis to the liver

Table 3: Distribution of sun exposed and non sun exposed cutaneous sites

CONCLUSIONS

- The FDA reports are of poor quality with less than half (median of 3 out of 8) of relevant information not included for clinical data
- Heavy TOUCH (USA, reported through TOUCH, N=20) cases tend to have lower clinical quality scores compared to Light TOUCH (USA, used TOUCH information, N=54) and No TOUCH (USA ,N=23; Non-USA, N=42) cases
 - Melanoma site and relevant medical history stand out as being neglected in Heavy TOUCH reports
- High percent of cutaneous melanoma in non sun exposed sites
 - As $\alpha 4$ integrin has been reported to inhibit both immune cells and prevent the movement of melanoma cells, its suppression by Natalizumab is a putative cause of what we suspect is a anomalous percentage of melanomas in this population¹⁰.

REFERENCES

- Foundation MR. What is Melanoma? Available from URL: <http://www.melanoma.org/understand-melanoma/what-is-melanoma> [accessed February 6, 2015].
- SEER. Melanoma of the Skin-SEER Facts Sheet. Available from URL: <http://seer.cancer.gov/statfacts/html/melan.htm> [accessed February 6, 2015].
- Bergamaschi R, Montomali C. Melanoma in multiple sclerosis treated with natalizumab: causal association or coincidence? Mult Scler. 2009;15: 1532-1533.
- Nali LH, Moraes L, Fink MC, Callegaro D, Romano CM, Oliveira AC. Natalizumab treatment for multiple sclerosis: updates and considerations for safer treatment in JCV positive patients. Arq Neuropsiquiatr. 2014;72: 960-965.
- Carson KR, Focosi D, Major EO, et al. Monoclonal antibody-associated progressive multifocal leukoencephalopathy in patients treated with rituximab, natalizumab, and efalizumab: a Review from the Research on Adverse Drug Events and Reports (RADAR) Project. Lancet Oncol. 2009;10: 816-824.
- Biogen. Touch Prescribing Program Resources. Available from URL: <https://www.touchprogram.com/ATTP/toTOUCHResources.jsp> [accessed January 16, 2015].
- Elwood JM, Gallagher RP. Body site distribution of cutaneous malignant melanoma in relationship to patterns of sun exposure. Int J Cancer. 1998;78: 276-280.
- Bulliard JL, De Weck D, Fisch T, Bordoni A, Levi F. Detailed site distribution of melanoma and sunlight exposure: aetiological patterns from a Swiss series. Ann Oncol. 2007;18: 789-794.
- Yarnold PR, Soltysik RC. Optimal data analysis: Guidebook with software for Windows. Washington, DC: APA Books (2005).
- Qian F, Vaux DL, Weissman IL. Expression of the integrin alpha 4 beta 1 on melanoma cells can inhibit the invasive stage of metastasis formation. Cell. 1994;77: 335-347.