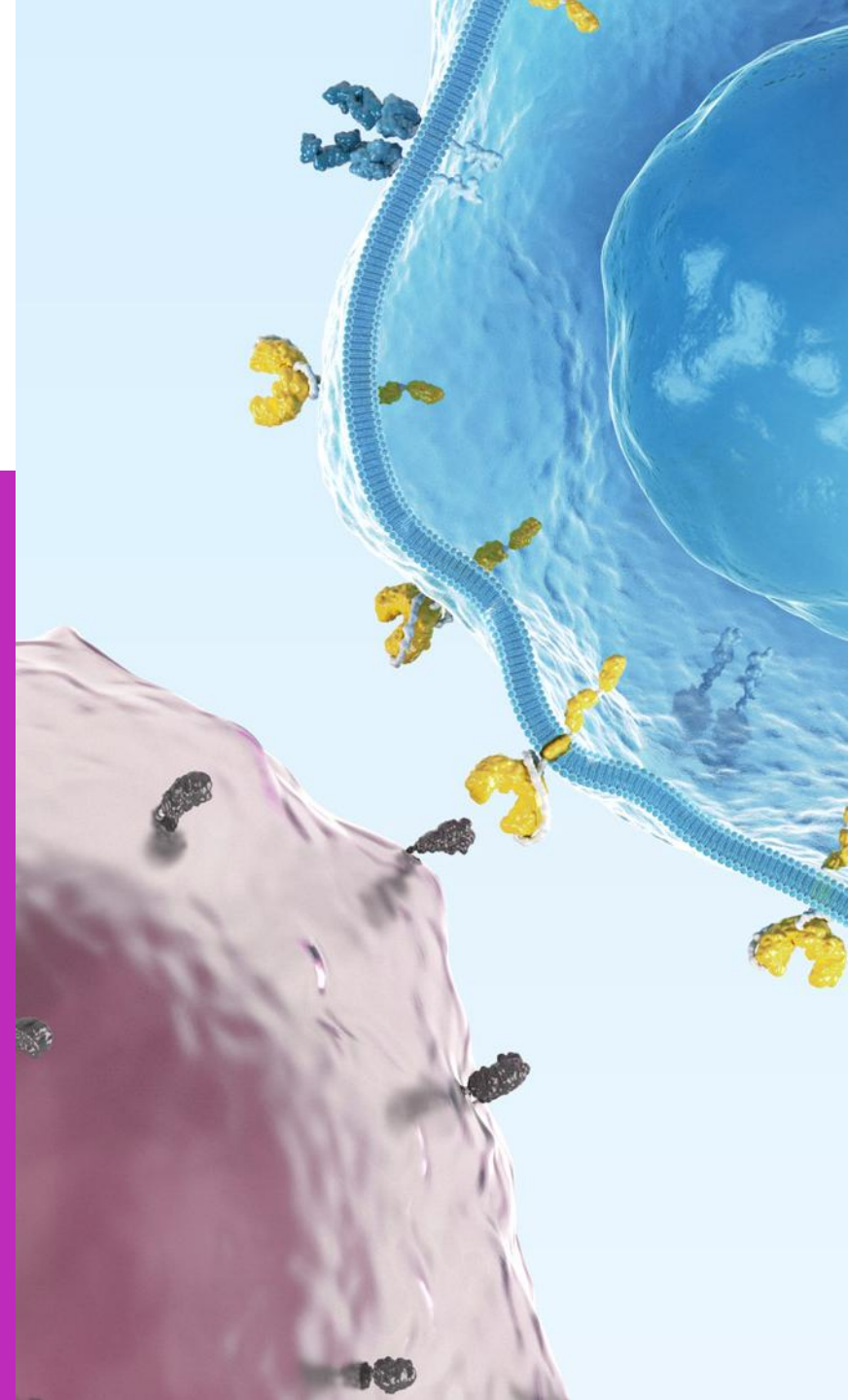


CASSS CGTP Summit 2026

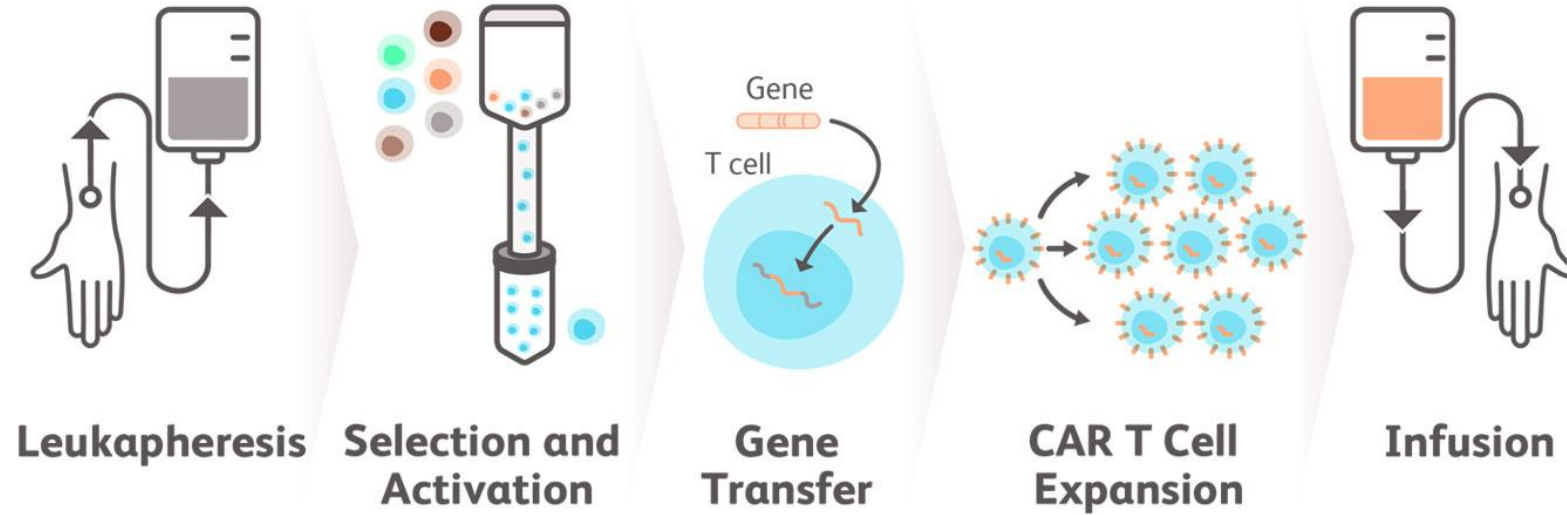
# Rethinking Product Release Specifications for Autologous CAR T Cell Therapy

*Kedar H. Dave*

June 8, 2026



# Autologous CAR T Cell Therapies at Bristol Myers Squibb



FDA approved March 2021  
EMA approved August 2021

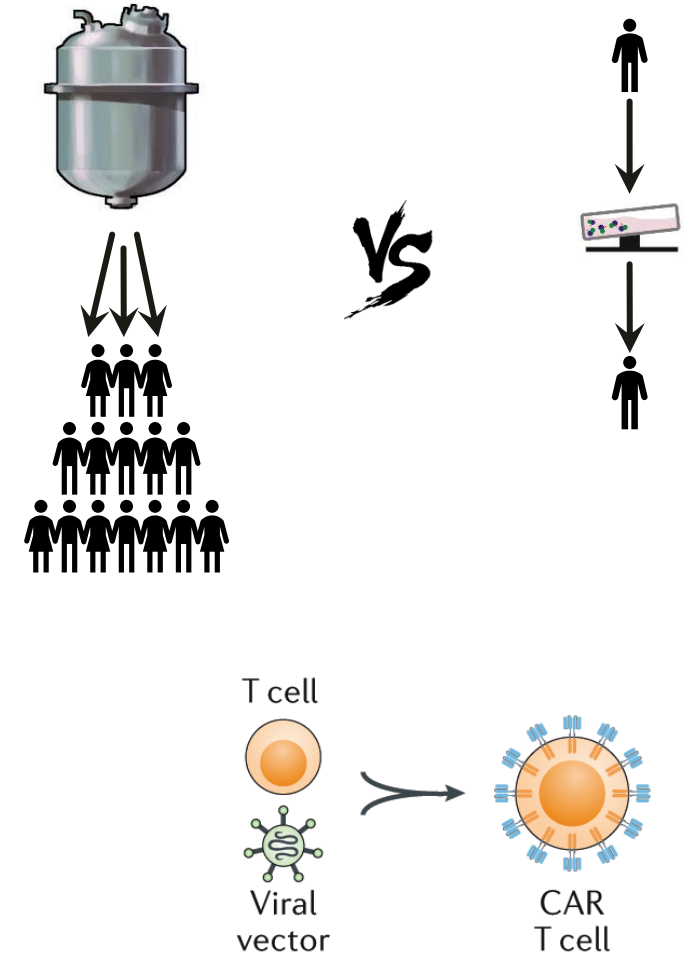


FDA approved February 2021  
EMA approved January 2022

# Unique challenges for CMC Control Strategy:

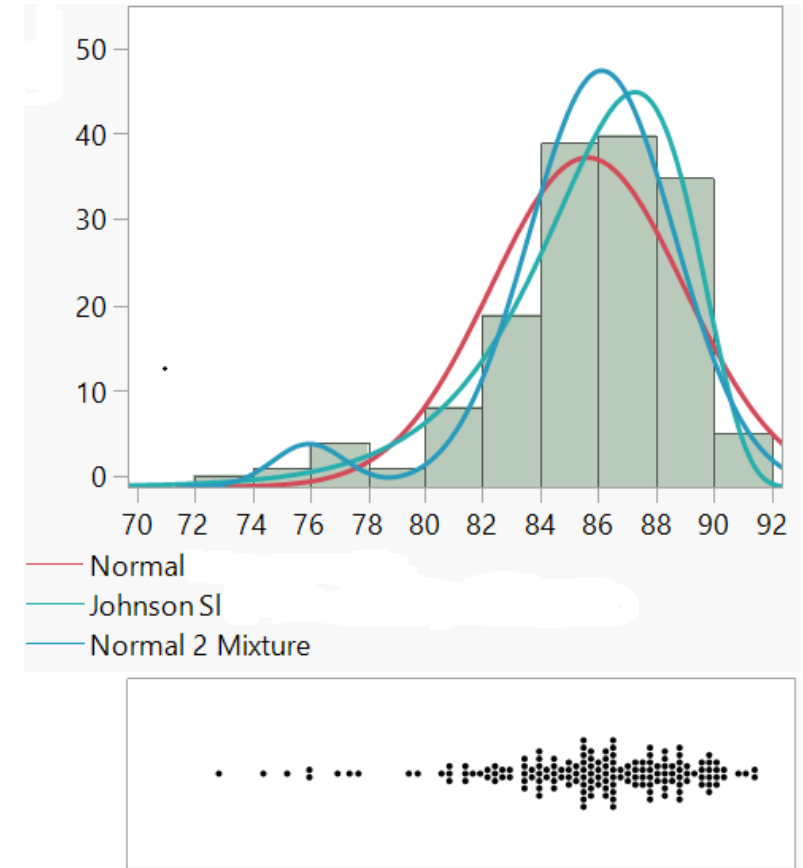
## Contrasting traditional pharma & biologics v/s autologous CAR T

- ❑ Each patient is a drug product batch, each batch is a dose
- ❑ Complex MoA, multiple pathways
- ❑ CMC and clinical elements are highly interconnected
- ❑ Starting material is usually the most dominant source of variability<sup>1</sup>
- ❑ Viral vector for gene delivery manufactured separately
- ❑ Release specifications for DP are often, relatively “too tight”
  - based on larger sample sizes (large number of at-scale clinical batches at the time of PPQ / commercialization)
  - using 95% confidence, but less than 99% coverage Tolerance Bounds
  - high Out-Of-Specification (OOS)<sup>6</sup> rates even under common cause variability could become a *de facto* patient selection mechanism



# Lessons learnt

- ❑ BMS has extensively shared their experience gained over the years<sup>1, 4, 15, 17</sup>
- ❑ Impact of OOS:
  - Financial viability<sup>13</sup>, compliance risks and possibly health outcome (- Nocebo effect<sup>2</sup>)
- ❑ Typical interactions with health authorities:
  - “Indication-specific” or “Lines of therapy” specific release criteria?
  - Representativeness and homogeneity of data sets
  - Consistency of manufacturing
  - Holistic assessment of the Control strategy<sup>8</sup>
  - Clinical outcomes for patients at the tails (extremities) of the data distribution
  - Statistical details - distribution model fitting, coverage levels, example calculations
- ❑ An evolving paradigm



# Some thoughts on the road ahead

## □ Design of Experiments<sup>10</sup>

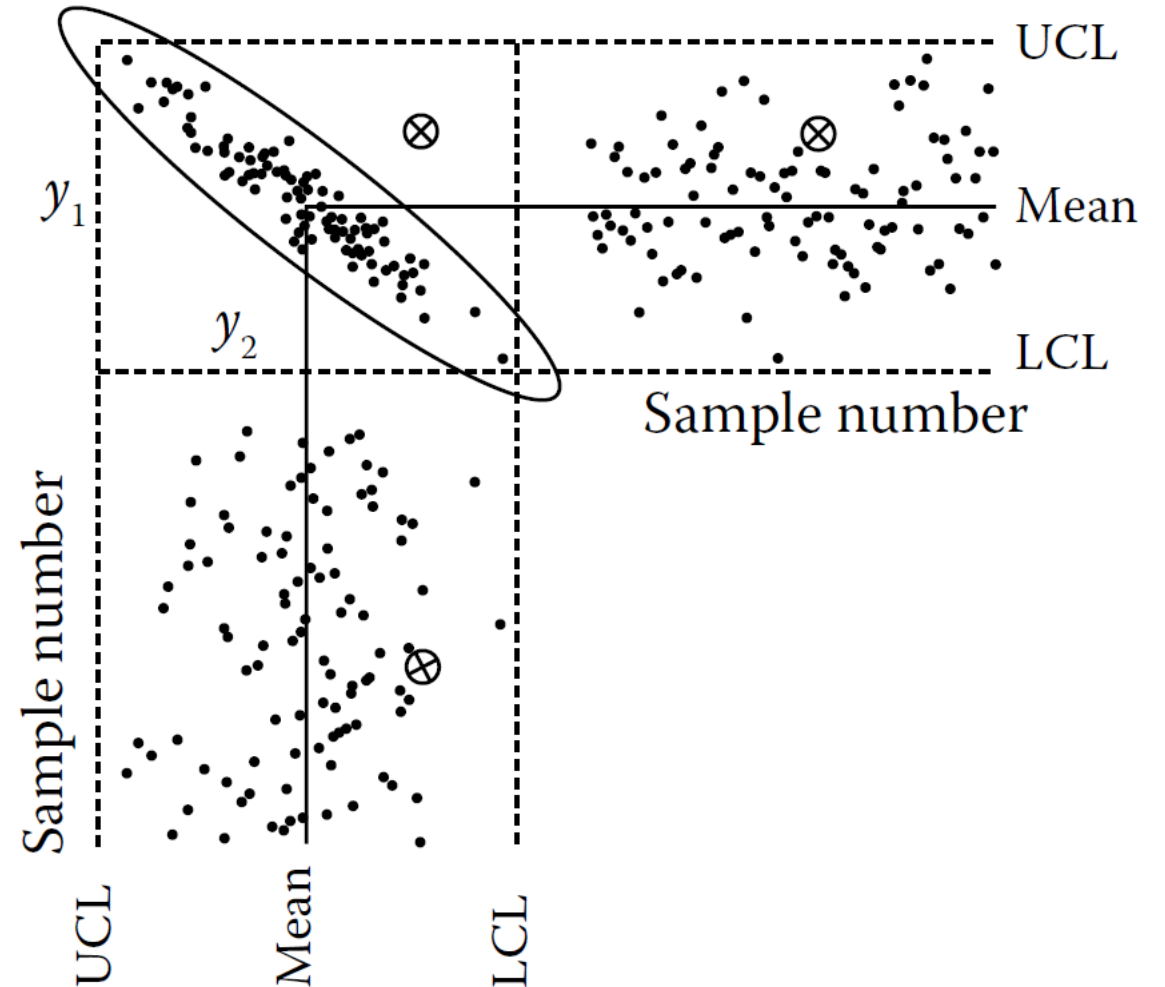
- Maximize the information gained in the presence of constraints
- Framework for causal models
- Variance Components Analysis

## □ Bayesian approaches<sup>7</sup>

- Before and after modeling
- Framework for incorporating prior knowledge

## □ Multivariate approaches<sup>12,14,16</sup>

- Model measurements collectively
- Framework for incorporating large dimensions, correlations, noise



# Some thoughts....(contd.)

## ❑ Systems thinking

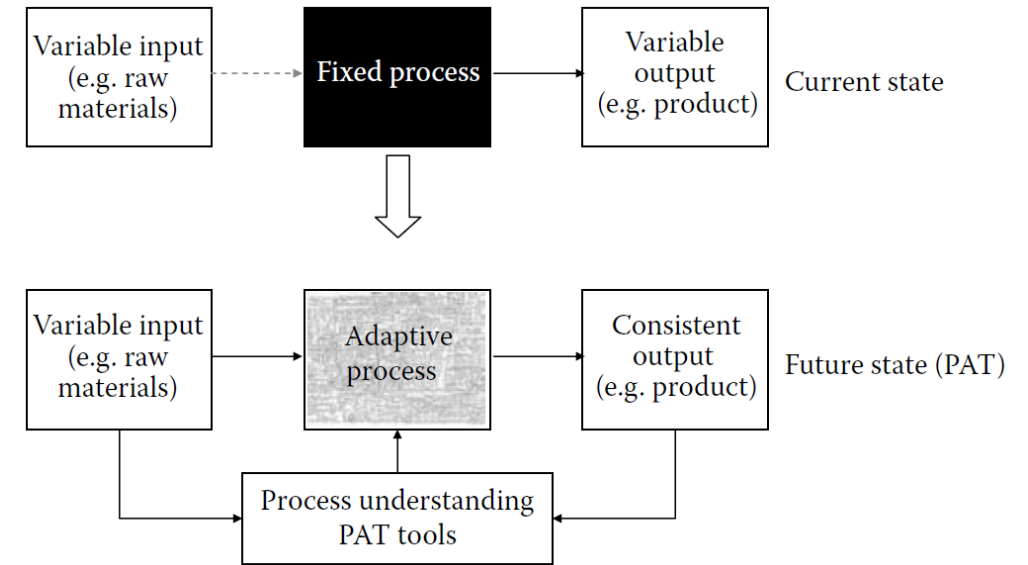
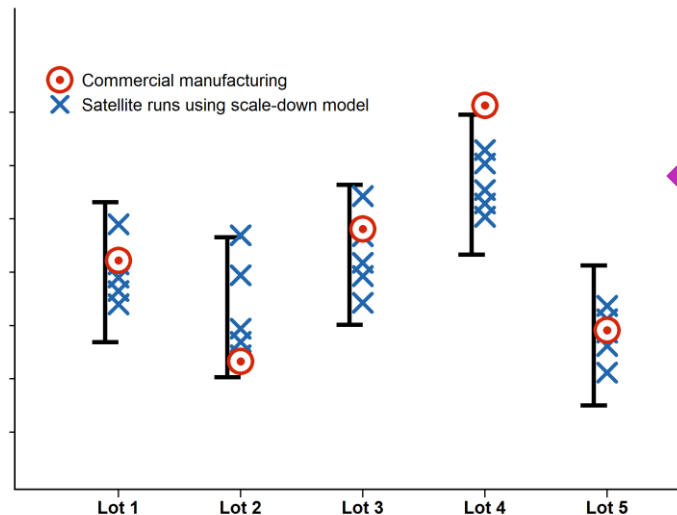
- Model-driven, adaptive manufacturing<sup>11, 16</sup> processes

## ❑ Patient-centric specifications<sup>5, 9</sup>

- Personalized quality standards
- Marginal Design Spaces and Marginal Release Specifications

## ❑ Scale-down models

- Satellite runs for lot release<sup>3</sup>



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