

Use of Archived Specimens in Evaluation of Prognostic and Predictive Biomarkers

Richard M. Simon, Soonmyung Paik, Daniel F. Hayes

The development of tumor biomarkers ready for clinical use is complex. We propose a refined system for biomarker study design, conduct, analysis, and evaluation that incorporates a hierarchical level of evidence scale for tumor marker studies, including those using archived specimens. Although fully prospective randomized clinical trials to evaluate the medical utility of a prognostic or predictive biomarker are the gold standard, such trials are costly, so we discuss more efficient indirect “prospective-retrospective” designs using archived specimens. In particular, we propose new guidelines that stipulate that 1) adequate amounts of archived tissue must be available from enough patients from a prospective trial (which for predictive factors should generally be a randomized design) for analyses to have adequate statistical power and for the patients included in the evaluation to be clearly representative of the patients in the trial; 2) the test should be analytically and preanalytically validated for use with archived tissue; 3) the plan for biomarker evaluation should be completely specified in writing before the performance of biomarker assays on archived tissue and should be focused on evaluation of a single completely defined classifier; and 4) the results from archived specimens should be validated using specimens from one or more similar, but separate, studies.

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Many cancer patients do not benefit from the systemic treatments they receive. For example, adjuvant chemotherapy that is considered highly effective may often improve the disease-free or overall survival rate by only 5–10 percentage points. Also, chemotherapy for metastatic disease often provides sustained benefit for a small portion of the patients treated. Therefore, the practice of oncology has been very inefficient, with exposure of far more patients than will benefit to the cost and toxicity of these agents. Although this overtreatment is understandable in dealing with life-threatening diseases, the ability to better “personalize” treatment decisions could have important benefits for patients as well as medical costs. In spite of developments in biotechnology and genomics, the pace of acceptance of new markers to inform treatment decisions for patients with cancer has been slow. The limited introduction of effective biomarkers is partly because of the substantially lower reimbursement for tumor marker tests, as compared with therapeutics by health insurers, but is also because of a shortage of prospective studies of marker utility and the lack of reproducibility and reliability among the many published retrospective studies of prognostic and predictive markers (1,2).

Several committees and authors have proposed specific guidelines that might be used to evaluate and report a given marker. For example, in 1996, the members of the American Society of Clinical Oncology Tumor Markers Guidelines Committee recommended five Levels of Evidence (LOEs) that might be used to determine the clinical utility of a tumor marker (3). This LOE scale has been widely cited and used as a template for deciding whether to recommend the use of a tumor marker in clinical practice and for design and conduct of tumor marker studies (4,5). The criteria for reporting the results of marker studies (designated the REMARK criteria) have been published in several journals, and at least a few journals have incorporated REMARK into the required submission format (6,7).

In this article, we will address the nature of the methodological difficulties involved in studying tumor markers, both prognostic

(ie, predictive of prognosis, independent of treatment) and predictive (ie, in terms of best choice of therapy). We will also propose that there are conditions in which archived specimens can be used to provide reliable evaluations of the clinical validity or medical utility of prognostic and predictive biomarkers.

Prospective Randomized Trials to Address Tumor Marker Utility

The gold standard for establishing clinical utility of a new medical intervention is the prospective randomized clinical trial. Several authors have proposed prospective randomized clinical trial designs for evaluation of prospective or predictive diagnostic markers (8–13). In the latter circumstance, the medical utility of the candidate predictive biomarker can be established by evaluating the benefit of the new drug according to marker status (positive or negative) in adequately sized patient subgroups using a prospectively specified analysis plan within a randomized clinical trial that compares a regimen containing the new drug to a control.

One might consider a prospective clinical trial in which the test itself is the investigational intervention to be the ultimate validation

Affiliations of authors: Biometric Research Branch, National Cancer Institute, Bethesda, MD (RMS); Division of Pathology, National Surgical Adjuvant Breast and Bowel Project, University of Pittsburgh, Pittsburgh, PA (SP); Breast Oncology Program, University of Michigan Comprehensive Cancer Center, Ann Arbor, MI (DFH).

Correspondence to: Richard M. Simon, DSc, Biometric Research Branch, National Cancer Institute, 9000 Rockville Pike, Bethesda, MD 20892-7434 (e-mail: rsimon@nih.gov).

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80 of a prognostic or predictive tumor marker. That is, a trial may be
designed so that a patient's care would be determined based on ran-
dom assignment to use the test or not, as referred to as the marker
strategy design by Simon and Wang (14). In such a trial, treatment
85 decisions are made for patients who are randomly assigned to the
control group using standard prognostic factors and practice guide-
lines. For patients who are randomly assigned to the investigational
group, the test, or marker, is used in treatment determination, per-
haps in conjunction with standard prognostic factors. The test
90 would be performed only for patients who are randomly assigned to
the test group, and the trial would be evaluated by comparing out-
comes overall for the two randomization groups. The outcomes
must be compared overall because the new test is not used for the
"control" group. In many cases, this restriction seriously limits the
95 information that can be gleaned from the design. Results can be
particularly confounded and diluted in cases where the standard of
care is variable among physicians.

The marker strategy design is also generally very inefficient in
terms of the number of patients required for randomization. Sam-
ple size requirements for randomized clinical trials are often
100 proportional to the reciprocal of the square of the size of the treat-
ment effect to be detected with a specified statistical power. For
the marker strategy design, only the overall treatment effect
between the two randomized groups can be evaluated, and the size
of that effect is generally quite small because many patients will
105 receive the same treatment regardless of the group to which they
are randomized. If the analysis is to demonstrate that withholding
a standard therapy for test-negative patients is not inferior, then
sample size problems are compounded, and even with a huge
sample size, the results are unlikely to be convincing.

110 An alternative approach requires that all patients be tested for
marker status "upfront." In this case, the evaluation can be focused
on subsets of patients for whom the treatment assignment that is
based on the test differs from treatment assignment that is based
on standard of care. For example, suppose the standard of care is
115 to use chemotherapy for stage II patients but not for stage I
patients and the test purports to identify patients who are likely to
benefit from chemotherapy regardless of stage; test-positive
patients will receive chemotherapy and test-negative patients will
not. In this case, the only patients randomly assigned are stage I
120 patients with a positive test and stage II patients with a negative
test. The design enables the effectiveness of chemotherapy to be
evaluated separately for these subsets of patients. This design pre-
sumes, however, that the standard of care, as a function of standard
prognostic variables, is determined.

125 This strategy of testing all patients up-front is used by two
current clinical trials, the Microarray in Node-Negative Disease
may Avoid Chemotherapy (MINDACT) study in Europe (15) and
the Trial Assigning Individualized Options for Treatment (Rx)
(TAILORx) study in North America (16). Although the designs of
130 both trials are complex and somewhat different, they both address
the medical utility of withholding standard of care chemotherapy
from women with node-negative estrogen receptor-positive breast
cancer who have a predicted low risk of recurrence, based on a
predefined gene expression-based risk score. The MINDACT
135 study evaluates a 70-gene classifier, and the TAILORx study eval-
uates a 21-gene classifier. Even though these designs are more

efficient than the randomized marker strategy trial design, both of
these studies will require many thousands of patients, and nearly a
decade each from the time, accrual was begun until the first results
140 are anticipated. The TAILORx and MINDACT studies will cost
millions of dollars or Euros to conduct, and with the current speed
of the evolution of technology, the test being evaluated may have
become obsolete by the time such studies are completed.

It is common for a new marker to be identified after the defin-
itive trials have demonstrated benefit for a specific agent or class of
145 agents or even type of modality (such as chemotherapy in general).
We maintain that, in many cases, it may be possible to use archived
specimens collected in the past from appropriate previously con-
ducted therapeutic trials and to preserve the focus, control of type
I error, and statistical power of properly designed fully prospective
150 studies. Indeed, when there is substantial preliminary evidence that
a new marker predicts benefit from a specific drug, it may some-
times be possible to assay the marker in archived specimens from
randomized clinical trials that were conducted to evaluate the
drug, as was done for *KRAS* in colorectal cancer (17,18). 155

When suitable archived tissue is available and can be used reli-
ably, it can facilitate and expedite delivery of valuable cancer diag-
nostics that may be of considerable benefit to patients. Nonetheless,
there are certainly also risks to patients from the unreliable use of
160 archived tissues. We have tried here to clarify the key features
involved in using these resources in a reliable manner, and we
propose a refinement to the previously published LOE scale that
permits a more critical analysis of the quality of tumor marker
studies using archived specimens.

165 **Prospective vs Retrospective Studies: A Matter of Semantics**

Although biomedical scientists and biostatisticians are taught
that "prospective" studies are preferable to "retrospective"
170 studies, the distinction between prospective and retrospective is
often confused with the distinction between "experimental" and
"observational." We propose that for studies of prognostic and
predictive biomarkers in oncology, the term retrospective is in
some cases misleading.

175 In cancer epidemiology, both retrospective case-control studies
and prospective cohort studies are observational, rather than ex-
perimental, studies. Neither type of study involves random assign-
ment of exposure, and hence, observed associations between
exposures and disease do not provide as strong a basis for claims
of causality as in experimental studies. The most serious limitation
180 of epidemiological studies is their nonexperimental nature, not
whether they are retrospective or prospective.

185 In therapeutics, many retrospective analyses are also nonexper-
imental, with treatment selection based on patient factors and re-
ferral pattern rather than on randomization. Such studies are also
often conducted without a written protocol and are unfocused,
with numerous patient subsets and endpoints compared without
control for the overall chance of a false-positive conclusion. In
contrast, prospective randomized clinical trials contain internal
190 control of treatment assignment, careful and proscribed data col-
lection (including outcomes and endpoints), and a focused analysis
plan that is developed before the data are examined.

195 Many biomarker studies are conducted with convenience sam-
ples of specimens, which just happen to be available and are
200 assayed for the marker, with no prospectively determined subject
eligibility, power calculations, marker cut-point specification, or
analytical plans. Such studies are very likely to result in highly
biased conclusions and truly deserve to be pejoratively labeled as
“retrospective.” However, if a “retrospective” study is designed to
205 use archived specimens from a previously conducted prospective
trial, and if certain conditions are prospectively delineated in a
written protocol before the marker study is performed, we argue
that it might be considered a “prospective–retrospective” study.
Such a study should carry considerably more weight toward deter-
210 mination of clinical utility of the marker than a simple study of
convenience, in which specimens and an assay happen to be avail-
able. Having multiple studies of different candidate biomarkers
based on archived tissues from the same prospective trial would,
however, present a greater opportunity for false-positive conclu-
sions than a single fully prospective trial focused on a specific
215 biomarker. Consequently, independent confirmation of findings
for specific biomarkers in multiple prospective–retrospective
studies is important (see below).

Using Archived Tissue to Establish the Medical Utility of a Marker

215 In assessing the use of archived specimens in the evaluation of
prognostic and predictive biomarkers, it is useful to consider
the three requirements for clinical acceptance of a tumor
marker that were first proposed by Henry and Hayes (2): 1) the
specific setting and utility of the marker must be clear, 2) the
220 magnitude in either outcomes or treatment effects between
those patients who are “positive” for a marker must be suffi-
ciently different from those who are “negative” for that marker
that the clinician and/or patient would accept different treat-
ment strategies for the two patients, and 3) the estimates of that
225 magnitude must be reliable.

These criteria relate to establishing the clinical utility of the
marker. It is useful to clarify the use of the term “validation” as
applied to diagnostic tests. Hunter et al. (19) distinguished three
types of validity in terms of genetic tests: “First, there is the ques-
230 tion of a test’s analytic validity, its ability to accurately and reli-
ability measure the genotype of interest . . . Second, one must
consider clinical validity, or the ability of the test to detect or pre-
dict the associated disorder . . . Finally, there is the issue of the
test’s clinical utility, or the balance of its associated risks and ben-
235 efits if it were to be introduced into clinical practice.” Clinical
utility requires that the test is “actionable,” that the clinical context
and medical indication for use of the test is clear, and that the
magnitude of outcomes or treatment effects associated with dif-
ferent results of the test are sufficiently great as to influence treat-
240 ment decisions. A serious defect of most retrospective studies of
prognostic markers is that the patients are not selected for address-
ing a defined medical indication for use of the marker. Such studies
may establish a correlation with clinical outcome but not the med-
ical utility of the marker.

245 The consideration of reliably establishing the magnitude of
marker effect may be further divided into the following three

conditions: 1) the technical and analytical properties of the marker
assay must be accurate and/or robust and reproducible; 2) the clin-
ical study design and analysis must be appropriate and adequate to
250 address the utility of a precise intended clinical use; and 3) the
results should be verified, or validated, in more than one study set,
with similar estimates of the magnitude in separate populations of
patients that resemble each other. Each of these conditions is po-
255 tentially subject to considerable bias in most retrospective studies
using archived specimens, especially those of convenience. Even if
the investigation is a prospective–retrospective study, careful at-
tention to each of these concerns will reduce the bias and inconsis-
tent results obtained with studies of convenience, and we believe
that it will further hasten the introduction of useful tumor markers
260 into clinical practice.

Analytical Concerns

“Analytical validation” generally refers to reproducibility and
robustness of the test or assay value. This generally includes
minimizing variation with regard to both preanalytical factors,
such as tissue collection, processing, storage, and preparation, as
265 well as analytical factors, such as reagent choice, incubation time
and conditions, and method of readout (including cut-point
determination) (20,21).

For a clinical biomarker evaluation using archived tissues to be
interpretable, it is necessary that the assay results from the archived
270 sample reflect what would happen in a true clinical setting. The
following are examples of how archived tissue might differ from
true clinical specimens.

1) Preanalytical issues. It is possible that samples collected in
275 the past, and specifically for the bank in hand, might be handled
differently than they are in current practice. Examples of differ-
ences might include whether a precollection diagnostic biopsy
was performed (which might affect various gene expression and
tissue processes), the time after the sample was removed from the
280 patient and processed (fixed, frozen, etc), procedures for fixation
or freezing, how the sample was stored (temperature, exposed to
room air, as a tissue block or a section on a slide, etc), and how
many cycles it was frozen and thawed.

2) Analytical issues. For a tumor marker study to be sufficient
285 to change clinical practice, the test itself should be ready for
clinical practice. For studies to change clinical practice, the inves-
tigator should carefully and prospectively plan to use reagents,
conditions, and cut points that have been previously determined
to be accurate and reproducible. These considerations include
290 fixed reagent supply sources, concentrations, and incubation times
among many other possible variables. In addition, the investi-
gator should have demonstrated with statistical confidence the
analytical concordance of results between archived specimens
and clinical samples for that specific assay. Examples of these
295 concerns include whether the sample was prepared for analysis
in a tissue microarray or as a whole section, and whether and
how it was subjected to antigen retrieval.

As a precaution against bias that may result from incomplete
300 analytical and preanalytical validation, marker studies using
archived specimens should have the assays performed blinded to all
clinical data, including treatment and patient outcome.

Clinical Study Design

305 As noted in the first required condition, the investigator should have
 a clear idea of the specific intended use for the assay. In general, this
 will be as a prognostic factor to decide if any further treatment is
 necessary or as a predictive factor to determine whether a particular
 type of therapy is likely to be effective. To establish medical utility of
 310 a prognostic marker, a randomized trial is sometimes not necessary.
 For example, a prospective single-arm trial in which chemotherapy is
 withheld from patients at a low risk of recurrence is used in the por-
 tion of the TAILORx clinical trial designed to validate the very favor-
 able prognostic outcomes in the low recurrence score population.
 315 Assuming that preanalytical factors are well controlled and match
 current practice activities and that the clinical data are collected in a
 fashion typical of a clinical trial, archived tissue from a sufficiently
 large population of untreated patients may be adequate to permit ac-
 curate estimates of recurrence based on tumor marker subgroups for
 320 determination of clinical utility of the marker.

Tumor response data from a single-arm phase II clinical trial of
 a specified treatment can be used to establish the clinical validity of

a biomarker for predicting response to that treatment, but a larger
 randomized trial with a survival or progression-free survival end-
 point is generally required to establish the medical utility of the
 predictive marker. 325

Suggested Revision of LOEs

In the original American Society of Clinical Oncology LOE scale,
 “retrospective studies” were determined to be LOE II or worse (3).
 We now propose an updated revision of the LOE scale, in which
 330 more precise definitions are provided for the types of studies that
 might be used to analyze the clinical utility of a biomarker and in
 which retrospective studies using archived specimens might reach
 level I evidence. The LOE for the medical utility of a biomarker
 relates to key factors involving patients, specimens, assays, and statis-
 335 tical analysis plans (Tables 1 and 2).

Scientifically, the clinical utility of a biomarker in a particular
 situation is best addressed by a prospective randomized clinical trial
 (Table 1, category A). Patients are entered, treated, and followed

Table 1. Elements of tumor marker studies that constitute Levels of Evidence determination*

Category	A	B	C	D
Element	Prospective	Prospective using archived samples	Prospective/observational	Retrospective/observational
Clinical trial	PCT designed to address tumor marker	Prospective trial not designed to address tumor marker, but design accommodates tumor marker utility Accommodation of predictive marker requires PRCT	Prospective observational registry, treatment and follow-up not dictated	No prospective aspect to study
Patients and patient data	Prospectively enrolled, treated, and followed in PCT	Prospectively enrolled, treated, and followed in clinical trial and, especially if a predictive utility is considered, a PRCT addressing the treatment of interest	Prospectively enrolled in registry, but treatment and follow-up standard of care	No prospective stipulation of treatment or follow-up; patient data collected by retrospective chart review
Specimen collection, processing, and archival	Specimens collected, processed, and assayed for specific marker in real time	Specimens collected, processed, and archived prospectively using generic SOPs. Assayed after trial completion	Specimens collected, processed, and archived prospectively using generic SOPs. Assayed after trial completion	Specimens collected, processed and archived with no prospective SOPs
Statistical design and analysis	Study powered to address tumor marker question	Study powered to address therapeutic question and underpowered to address tumor marker question Focused analysis plan for marker question developed before doing assays	Study not prospectively powered at all. Retrospective study design confounded by selection of specimens for study Focused analysis plan for marker question developed before doing assays	Study not prospectively powered at all. Retrospective study design confounded by selection of specimens for study No focused analysis plan for marker question developed before doing assays
Validation	Result unlikely to be play of chance Although preferred, validation not required	Result more likely to be play of chance that A but less likely than C Requires one or more validation studies	Result very likely to be play of chance Requires subsequent validation studies	Result very likely to be play of chance Requires subsequent validation

* PCT = prospective controlled trial; PRCT = prospective randomized controlled trial; SOPs = standard operating practices.

Table 2. Revised determination of Levels of Evidence using elements of tumor marker studies*

Level of evidence	Category from Table 1	Validation studies available
I	A	None required
I	B	One or more with consistent results
II	B	None or inconsistent results
II	C	2 or more with consistent results
III	C	None or 1 with consistent results or inconsistent results
IV–V	D	NA†

* Levels of Evidence (LOEs) revised from those originally proposed by Hayes et al. (3).

† NA = not applicable because LOE IV and V studies will never be satisfactory for determination of medical utility.

prospectively according to a prewritten protocol; the study is prospectively powered specifically to address the tumor marker question; and specimens are collected, processed, and assayed for the marker in real time. The randomized trial will generally not use a “marker strategy design” as described above, however, because of the serious limitations of that design. Although further confirmation in a separate trial of the results gained from a category A prospective trial is always welcome, compelling results from such a trial would be considered definitive and no other validating trial would be required. This strategy was included in the original LOE scale proposed by American Society of Clinical Oncology as LOE I and continues to be the “gold standard.”

In the revised LOE scale, a second strategy to obtain level I data would be to perform a tumor marker study using archived specimens from a prospective trial that addresses a therapeutic question (or another marker question) and accommodates the current marker question (Table 1, category B). To evaluate prognostic markers that are intended to identify patients for whom prognosis is so good that further therapy would be withheld, the clinical trial in some cases may not need to be randomized. For example, in the TAILORx study, the low recurrence score group receives only endocrine therapy and is followed to determine if risk of recurrence is as low as predicted by the 21-gene recurrence score. To evaluate a predictive marker, the prospective trial would generally need to be a randomized trial that compares the treatment with an appropriate control treatment. As in study design A, patients are prospectively enrolled, treated, and followed, and specimens are prospectively collected, processed, and archived using generic standard operating procedures. The tumor marker question might be identified during the conduct of the trial or after its completion, but the specification of the tumor marker hypothesis should be based on results completely external to the trial. In fact, tissues archived from the trial should not be assayed until a new protocol has been written that focuses on the evaluation of the specified new marker with a completely specified statistical analysis plan. Before undertaking the study, the assay should be analytically and preanalytically validated for use with archived tissue, and the assay should be performed blinded to the clinical data. Because the trial was designed to address the therapeutic question, it will often be

underpowered to establish the statistical significance of treatment by marker interaction (22). It may, however, be adequately sized to reliably identify a large treatment effect in “test-positive” patients, as might be expected for a predictive biomarker. Nevertheless, even with these caveats, results from such a study will be more likely to arise from chance than those from a fully prospective approach.

It is clearly desirable that the available specimens from the archived bank should be representative of the patients who were accrued to the study as a whole, although there is no guarantee that the study patients are themselves representative of the general population of patients. Although there are no minimal requirements that can be universally applicable, we suggest that the correlative study should include at least two-thirds of the total accrued patients or that the patients be selected in a way that strives to avoid selection bias. For example, if the investigator wishes to minimize resource utilization, or wishes to use intrastudy specimen sets for test and validation, one might use a mathematical randomization scheme to select a sample of specimens for study that mirror the known important prognostic and predictive factors of the population as a whole (5).

For a category B study to be sufficient to change practice, we maintain that the results must be confirmed using specimens from a second category B study based on archived tissue from a different trial that has been designed, conducted, and analyzed in a similar, if not identical, manner. The results of these two studies must be equally compelling to change clinical practice. Furthermore, these validation studies need to be performed using the same assay or similar assays that clearly identify the same marker. For example, different investigators have used several different assays for p53 status, including direct sequencing for genetic abnormalities, immunohistochemistry to determine protein expression, or even functional assays. These assays provide very different indications of p53, and therefore, the available data are very difficult to interpret (5). Validation studies must also address the same endpoint and that endpoint should reflect medical utility.

Using nearly 1500 archived specimens collected within a prospective randomized clinical trial, Hayes et al. (23) reported that node-positive, estrogen receptor-positive, and human epidermal growth factor receptor 2-negative patients did not appear to benefit from addition of adjuvant paclitaxel chemotherapy after four cycles of doxorubicin and cyclophosphamide. Although these observations were provocative, results from a completely separate, but similarly designed, prospective randomized clinical trial did not confirm these findings (24), and the question regarding selection of patients for adjuvant paclitaxel remains open (25). Thus, this issue is still considered to be LOE II in Table 2. By contrast, the recently observed association of presence of *KRAS* mutations with lack of benefit from monoclonal antibodies directed against the epidermal growth factor receptor, such as cetuximab and panitumumab (17,18), provides an example of successful use of category B archived samples to establish medical utility. Several prospective randomized trials have demonstrated a small but statistically significant benefit from these antibodies, either alone or in combination with chemotherapy, for treatment of patients with advanced colorectal cancer (26). Preliminary, LOE II or III studies suggested that cetuximab and panitumumab are only active in

patients whose cancers carry a wild-type *KRAS* (27). These data have now been validated in a retrospectively performed study using archived samples from large prospectively randomized clinical trials and therefore would achieve LOE I in our modified scale (Tables 1 and 2) (28).

Category C (Table 1) biomarker studies use prospective patient registries in which subjects are treated and followed according to standards of care. Specimens are collected, processed, and archived prospectively, using generic standard operating procedures, but are assayed after the study has completed patient accrual. Tumor marker studies conducted using these specimens are often not prospectively powered at all. Because of the lack of control of treatment assignment, specimen collection, and data collection, such settings are generally more susceptible to selection biases for patients, specimens, and clinical data that include outcomes. This concern may not be the case in some tightly controlled population-based registries. Category C studies are more likely confounded by unrecognized biases, and their results are more likely to result from chance than those of categories A and B. Category C studies may be validated to LOE II if two or more subsequent studies provide similar results (Table 2). However, it is unlikely that category C studies would ever be sufficient to change practice, except under particularly compelling circumstances.

Category D studies (Table 1) are the most common type of reported tumor marker analyses: studies of convenience in which specimens were collected for unknown reasons, processed and stored in a variety of ways, and happen to be available for assay. The results from these types of studies are highly unstable and likely to be because of chance alone.

Summary

Ideally, any new medical intervention will be adopted into clinical practice only in the setting of level I evidence, and ideally, such evidence is generated in a prospective randomized clinical trial. However, such trials are not always practical. In the case of tumor markers, practice guidelines and the availability of other diagnostic procedures can sometimes make it very difficult to perform new clinical trials because such trials may involve withholding of therapy that is considered standard of care. Even when they are considered ethical, such trials usually require many years to conduct and are quite expensive. For new drug development, in many cases, an analytically validated companion diagnostic test will not be available or the appropriate biological measurement may not be clear at the time that the pivotal trials of the drug are initiated, as for the use of *KRAS* mutation as a predictive biomarker for EGFR inhibitors in colorectal cancer (17,18,28).

Archived tissue specimens from high-quality datasets can therefore be of great importance for establishing the medical utility of a prognostic or predictive biomarker. We argue that it is appropriate to use archived tissue specimens from large prospective clinical trials to do so. For such an evaluation to be more useful than just for generating hypotheses, however, several conditions must be satisfied:

- 1) Archived tissue, adequate for a successful assay, must be available on a sufficiently large number of patients from the pivotal trials to permit appropriately powered analyses and to ensure

that the patients included in the biomarker evaluation are clearly representative of the patients in the pivotal trials. Although no minimal requirement can be stated as universally applicable, we would suggest that samples from at least two-thirds of the patients be available for analysis.

- 2) Substantial data on analytical validity of the test must exist that ensure that results obtained from the archived specimens will closely resemble those that would have been obtained from analysis of specimens collected in real time. Assays should be conducted blinded to the clinical data.

- 3) The analysis plan for the biomarker evaluation must be completely developed before the performance of the biomarker assays. Both the analysis plan for the biomarker study and the design of the trial(s) whose samples were selected for analysis should be appropriate for the evaluation of a companion diagnostic had it been undertaken at the outset. The analysis should be focused on a single, completely defined, diagnostic classifier. For multigene classifiers, the mathematical form of combining the individual components, weights, and cut points should be specified beforehand. In general, the analysis should not be exploratory, and practices that might lead to a false-positive conclusion should be avoided.

- 4) The results must be validated in at least one or more similarly designed studies using the same assay techniques.

Physicians need improved tools for selecting treatments for individual patients. Cancers of the same primary site are in many cases heterogeneous in molecular pathogenesis, clinical course, and treatment responsiveness. Current approaches for treatment development, evaluation, and use result in treatment of many patients with ineffective drugs. Advances in cancer genomics and biotechnology are providing increased opportunities for development of more effective therapeutics and prognostic and predictive biomarkers to inform their use. These opportunities have enormous potential benefits for patients and for containing health-care costs. However, the complexity of cancer biology and the increased complexity of development of biomarkers with drugs offer formidable challenges to the transition to a more predictive oncology. In some cases, it is either ethically or practically impossible to evaluate the medical utility of prognostic and predictive biomarkers in a fully prospective manner.

It is essential to ensure that cancer patients are offered the benefits of valuable prognostic and predictive tests as soon as they are rigorously and reliably evaluated. In this article, we have tried to clarify some of the uncertainty in the field about the validation of prognostic and predictive biomarkers and to propose an update of a LOE schema that has been widely used for evaluating the medical utility of biomarkers in oncology. We believe that this update is important for improving the conduct of validation studies and, in some cases, for expediting the adoption of important diagnostic tools.

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