Stem Cells and Stem Cell Medical Tourism Vermont House Health and Welfare Committee April 7, 2021

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> Emeritus Chairman ATS Stem Cell Working Group



Disclosures

- Research Funding
 - National Institutes of Health
 - Department of Defense
 - Cystic Fibrosis Foundation
 - United Therapeutics Inc.
 - Medical Technology Enterprise Consortium





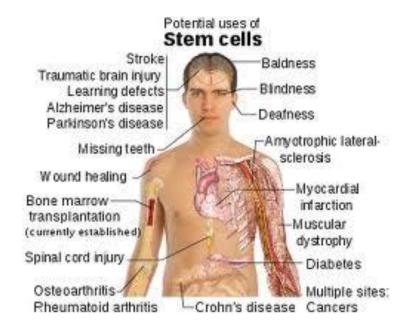
Overview

- Stem Cells
 - Embryonic and Induced Pluripotent
 - Hematopoietic (HSC)
 - Mesenchymal (MSC)
- Current FDA-approved use of stem cells
 - HSCs only: bone marrow transplantation
- Unproven, unauthorized use of stem cells
 - MSCs
 - Definition and scope of problem
- Countering the problem





What can you do with ESCs?



Goal: Repair damaged or diseased tissue

A) Administer ESCs

Go to damaged organ and differentiate into organ-specific cells

B) Differentiate the ESCs to the desired cells or tissue in culture and then administer

Theoretically Unlimited Potential

Problems with ESCs

- Ethical, moral, religious, political
- Source?
- Teratomas

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Tumors containing multiple
types of tissues
Skin
Muscle
Bone
Hair
Teeth
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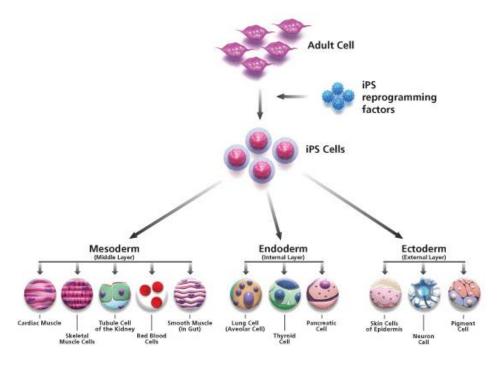
- Few clinical trials
- Many years from clinical use
- No approved therapies





Induced Pluripotent Stem Cells (iPS)

- Functional adult ESC equivalent
- No ethical, religious, moral, political concerns
- Same problems: teratomas



• Few clinical trials

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- Many years from clinical use
- No approved therapies



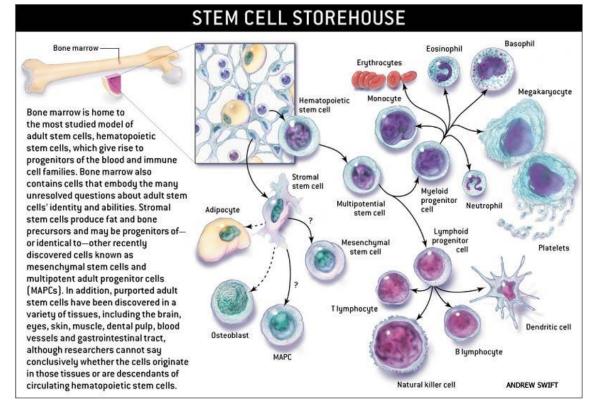
Adult Stem Cells

Bone marrow, adipose, cord blood, placenta, etc,

Bone marrow produces several different types of stem cells

Hematopoietic stem cell (HSC)

Mesenchymal derived stromal cells (MSC)

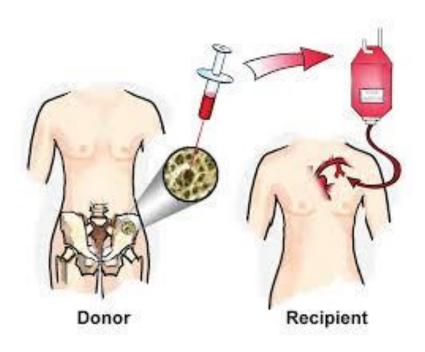


Lanza and Rosenthal Scientific American June 2004

Hematopoietic Stem Cells

Bone marrow, circulating adult blood, umbilical cord blood

- Replenish bone marrow damaged by cancer treatments
- Not directly treating cancers
- FDA approved for leukemias and lymphomas
- Autologous
- Allogeneic
- Widely and successfully utilized



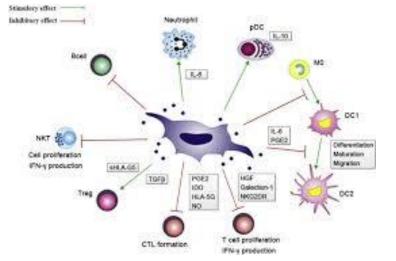
Immunomodulation: Mesenchymal Stem (Stromal) Cells

- Initially isolated from bone marrow: fat, placenta, cord blood
 - Do not circulate in adult blood
- Differentiation ability: bone, fat, cartilage
- Immunomodulatory role
 - Sample and react to inflammatory environments
- Immunoprivilege
- Many clinical trials

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- Approved for limited indications in Canada and New Zealand
- No FDA-approved use in US

Nothing on-label: no justifiable "off-label" uses





Unproven Stem Cell Therapies

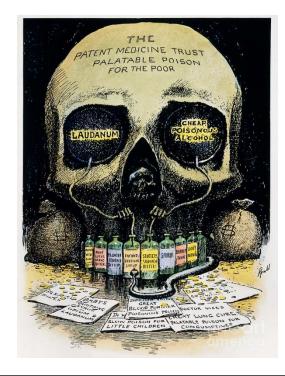
- Research and Clinical realities:
 - Few cell-based therapies are standard-of-care or approved by regulatory agencies
- Patient expectations:
 - Patients with chronic or end-stage diseases will seek unproven (stem) cell treatments motivated by therapeutic hope
 - High global demand for (stem) cell-based therapies
- The (problematic) answer:
 - Worldwide proliferation of "stem cell" clinics
 - Unproven, untested and potentially dangerous (stem) cell treatments
 - Different regulatory frameworks exacerbate the problem

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History of US drug regulation



1906 – US FDA established; accurate **labeling**



1938– Passage of Food, Drug, and Cosmetic Act (FDCA); **safety** testing

PARTICULARY PRZPARZD BY OLD WIST PRODUCTS

U. S. Races Death to

Save 700 From Elixir

By Associated Press

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Recovery of Pint Bottles Sold to Patients Goal as Deaths From Poison Reach 36

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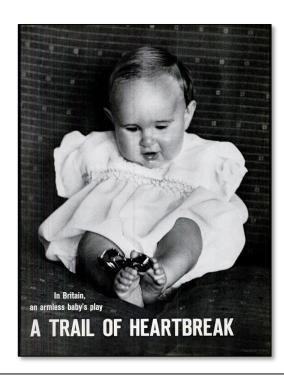
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1962– FDCA amended to require **efficacy** testing *(PMDA established in 2000)



FDA Pathways for New Therapies

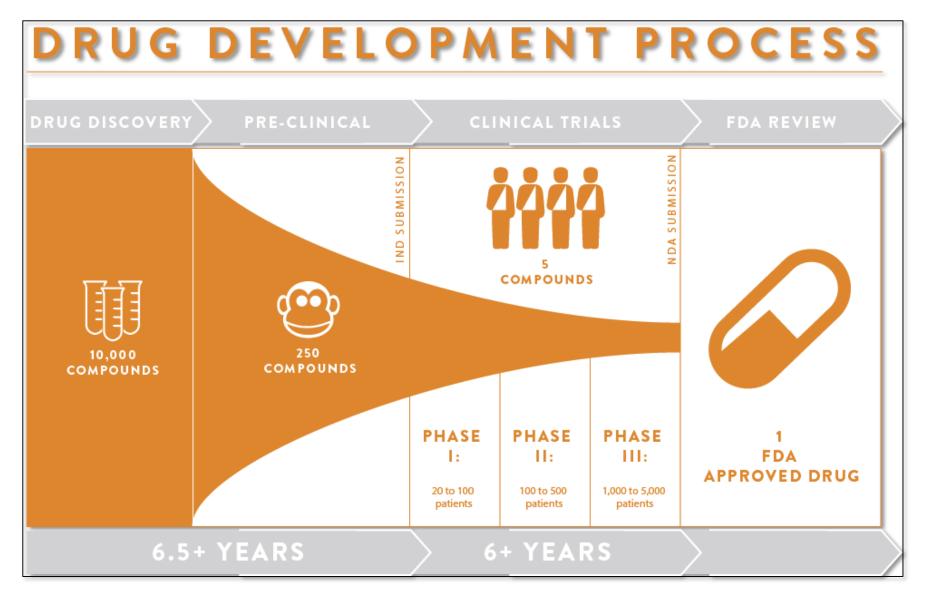
Bench Bedside IND + Phase 2 Phase 3 Approval Phase 1 Phase 0 Safety Safety Safety Efficacy Efficacy Efficacy Properties Dosing Fast Track, Breakthrough Therapy Designation, Accelerated Approval, Priority Review Compassionate Use Stem Cell RTT Clinics/Tourism

Knoepfler, Adv Drug Deliv Rev, 2015





FDA Pathways for New Therapies

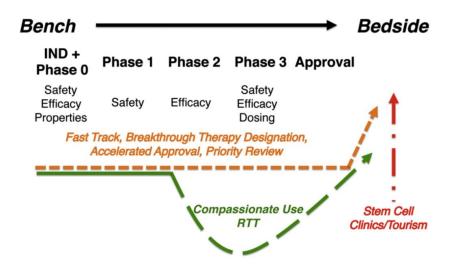


Source: www.givetocure.org

Speeding the Process

Regenerative Medicine Advanced Therapy (RMAT)

- Cell therapy intended to treat, modify, reverse, or cure a serious or lifethreatening disease or condition and has the potential to address unmet medical needs for such disease/condition
- Preliminary clinical evidence
- Use of real word evidence (e.g. observational data)







Speeding the Process

As of December 31, 2020:

- 155 Regenerative Medicine Advanced Therapy (RMAT) designation requests received overall
- 59 RMAT requests granted overall
- 1 product has received marketing authorization (Breyanzi (lisocabtagene maraleucel))
- Indications vary widely stroke, spinal cord injury, sickle cell disease, muscular dystrophy, others
- Major benefit: accelerate regulatory approval process

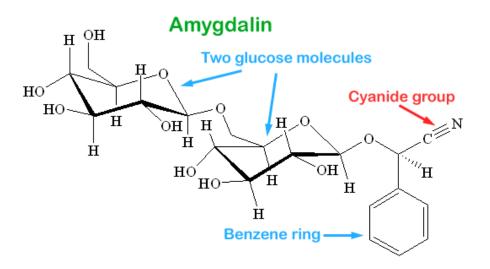


Medical Tourism

Travel to a country with less stringent regulations

Obtain treatment not otherwise available

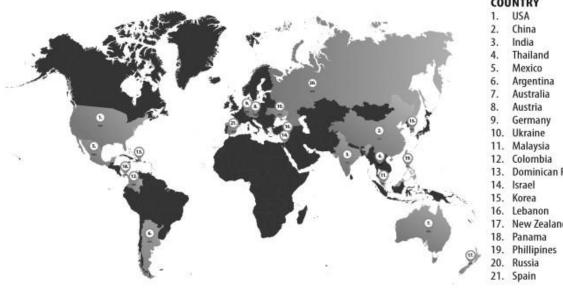








Stem Cell Medical Tourism



	COL	JNTRY	% OF CLINICS
	1.	USA	27
	2.	China	12
	3.	India	12
	4.	Thailand	11
	5.	Mexico	9
	6.	Argentina	3
	7.	Australia	3
	8.	Austria	3
	9.	Germany	3
		Ukraine	3
	11.	Malaysia	3
	12.	Colombia	1
	13.	Dominican Republi	c 1
	14.	Israel	1
	15.	Korea	1
	16.	Lebanon	1
	17.	New Zealand	1
	18.	Panama	1
	19.	Phillipines	1
1	20.		1
	21.	Spain	1

- An estimated 60,000 patients treated every year with unproven stem cell therapies
- Between \$300 million and \$2.4 billion spent every year on such treatments

Connolly et al., Travel Med. Infect. Dis., 2014 Deans et al., Cytotherapy, 2016





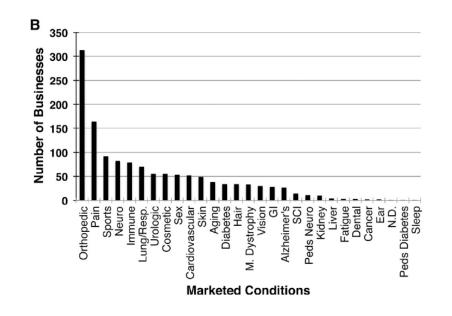
Defining Unproven Cell-Based Therapies

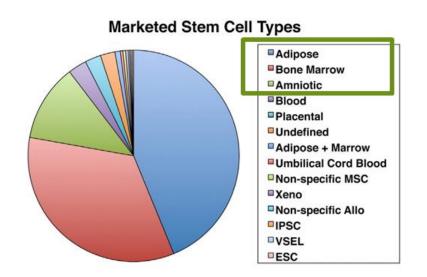
- Unclear scientific rationale to suggest efficacy
- Lack of understanding of scientific mechanism and/or biologic function to support clinical use
- Insufficient data from laboratory studies, animal models, or clinical studies to support use in patients
- Lack of a standardized approach to confirm product quality or manufacturing consistency
- Inadequate information disclosed to patients in order to obtain proper informed consent
- Use of non-standardized or non-validated methods of administration
- Uncontrolled experimental procedures in humans





Unproven Stem Cell Interventions





- Mode of administration:
 - Intravenous
 - Intrathecal
 - Intramuscular
 - Nebulized

Turner and Knoepfler Cell Stem Cell 2016





Stem Cell Clinics and FDA Regulations

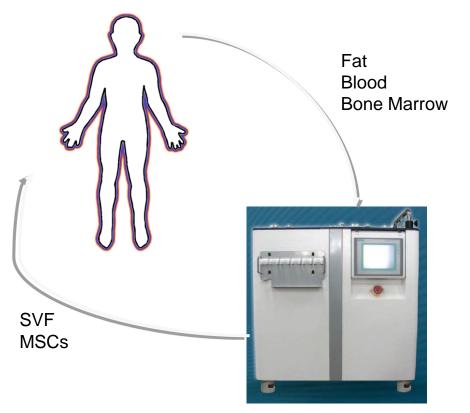
- Human cells and tissue-based products (HCT/Ps) are considered drugs (section 351 of the PHS Act): need demonstration of safety and efficacy (e.g. through clinical trials)
- Exceptions to this rule:
 - Cell products that are minimally manipulated, intended for homologous use and not combined with other articles (section 361 of the PHS Act)
 - Destined for use in the same individual within the same surgical procedure (surgical exemption)
- Most stem cell businesses in the U.S. claim these two exemptions to avoid having their products/interventions considered as drugs

Lysaght and Campbell, Cell Stem Cell, 2011 Turner, Trends Mol Med, 2015





Unproven Stem Cell Interventions



Same day collection, isolation and re-administration

Turner and Knoepfler, Cell Stem Cell, 2016





Stem Cell Clinics: Target Aging Demographics



Turner and Knoepfler 2016





Businesses offering unproven stem cell interventions

Misleading advertisement

- Direct-to-consumer advertising
 - Social media
- Registration to clinicaltrials.gov







Businesses offering unproven stem cell interventions

Misrepresentation of risks and benefits

- Portrayal of treatments as routine (instead of experimental and unproven)
- Exaggerated claims of safety and efficacy
- Absence of quantitative outcomes and/or poor patient follow-up





Businesses offering unproven stem cell interventions

Patient targeting

- Patient seminars (essentially sales pitch)
- Pressure on prospective patients to take on debt or crowdfund

Clinic makes its pitch: Beg, borrow and heal Lung Health Institute offers unproven treatments to desperate patients - and even coaches them on raising the

The Washington Post

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Ukraine

An unproven/unauthorized use of cell therapy disaster

The NEW ENGLAND JOURNAL of MEDICINE

BRIEF REPORT

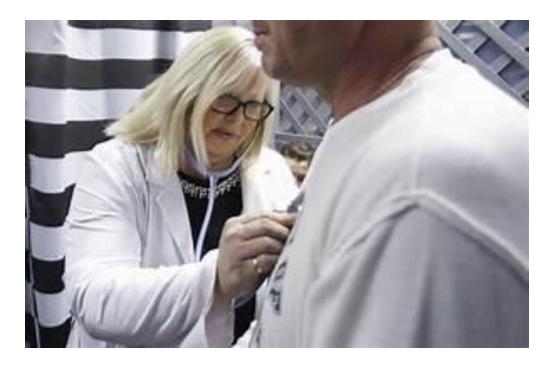
Vision Loss after Intravitreal Injection of Autologous "Stem Cells" for AMD





Unproven/unauthorized use of cell therapy

Missouri state lawmaker charged with selling fake stem cell treatments and claiming they are a cure for Covid-19







Fighting Back

U.S. F.D.A. Regulatory Action on HCT/Ps: The last 10 years







Fighting Back

Increasingly negative public perceptions of unproven "stem cell" interventions

Highly publicized cases of patients harmed by unproven cell-based interventions

Glipproliferative Lasion of the Spinal Cord as a Complication INCOMPANY AND INCOMPANY of "Ston-Call Tourism" Vision Loss after Intravitreal Injection N ENGL | MED 3752 NEIM.ORG JULY 14, 2016 of Autologous "Stem Cells" for AMD Negative coverage by lay press Los Angeles Times SunSentinel COLUMN COLUMN A deeper look at stem cell clinic where 3 The stem cell therapies offered by this La Jolla clinic aren't FDA Tampa Bay Times patients lost sight after treatment approved, may not work - and cost \$15,000 Unsatisfied former patient files class-action lawsuit against Lung Institute the principal delayed and the local of the local The Robert Sector Street The Washington Post The New Hork Times CR Consumer Reports F.D.A. Moves to Stop Rogue Miracle cures or modern quackery? Stem cell clinics multiply, with Clinics From Using Unapproved heartbreaking results for some The Trouble With Stem Cell Therapy Stem Cell Therapies patients. A new industry is booming. But critics worry that the treatments are ineffective and dangerous. Here's how to protect yourself. Review of the local division of the local di





FIRST OPINION

Kudos to Google for banning stem cell ads. Other tech companies should follow

By JEREMY SNYDER / SEPTEMBER 24, 2019



DENIS CHARLET/AFP/GETTY IMAGES

oogle took an important step this month toward restricting the reach of one breed of 21st-century snake oil purveyor: those selling stem cell treatments. Others need to follow its lead.

More than 600 clinics in the U.S. and many more around the world have co-opted the *potential* of using stem cell treatments to cure a range of medical conditions and now sell these treatments

Fighting Back

VERMONT MEDICAL SOCIETY RESOLUTION Stem Cell Clinics

- RESOLVED, that the Vermont Medical Society disseminate evidencebased information to its members regarding stem cell clinics and therapies and encourage members to have evidence based discussions with their patients when they inquire about such services; and be it further
- RESOLVED, that VMS coordinate with appropriate professional licensing boards, the Attorney General's Office and other regulatory bodies to ensure that patients seeking stem cell therapies are provided safe and evidence-based information and services.



