

REPORT 3 OF THE COUNCIL ON SCIENCE AND PUBLIC HEALTH (I-16)  
Genome Editing and its Potential Clinical Use  
(Reference Committee K)

EXECUTIVE SUMMARY

Objectives. The promise of gene therapy has increased substantially over the last decade due to rapid advancements in two technologies: DNA sequencing and genome engineering. Concurrently, techniques have been discovered that allow modification of the genome with a level of efficiency and precision that had not previously been achieved. One such technique, termed CRISPR-Cas9, has triggered a surge of research efforts to harness it for correcting mutations that are disease-causing, and to understand how it could be used as a therapeutic intervention in individuals with disease. Along with the scientific and medical advances in genome editing, ethical concerns also are evident, especially about the permanent editing of fertilized embryos. The Council on Science and Public Health has initiated this report to inform physicians and the House of Delegates about the remarkable advances in genome editing seen in recent years and its potential clinical applications in gene therapy, as well as concerns about it and proposals to ensure its responsible use.

Data Sources. Literature searches were conducted in the PubMed database for English-language articles published between 2006 and 2016 using the search terms “gene editing,” “genome editing,” and “CRISPR.” To capture reports not indexed on PubMed, a Google search was conducted using the same search terms. Genome editing information posted on the websites of the National Academies of Sciences, Engineering, and Medicine and the American Society of Human Genetics also was reviewed. Additional articles were identified by manual review of the references cited in these publications.

Results. Progress in gene therapy is likely to accelerate with the CRISPR-Cas9 genome editing techniques, which allows for precise and permanent modification of the genome without the complications that accompany other gene therapy techniques. The most immediate uses of genome editing have been in biomedical research settings. However, the relative ease of using CRISPR-Cas9 and other programmable nucleases has triggered the modeling of human disease and proof-of-concept studies in a number of species and in human cell lines. Early phase clinical trials are beginning to test genome editing as a therapeutic tool in select diseases. Translation of applications to the clinic will require the careful consideration of a number of factors, including the safety of the technology, its possible use in editing the germline, and high costs that could result in access problems and health disparities.

Conclusions. The last few years have seen unprecedented progress in the development of genome editing mechanisms and their potential applications for gene therapy. Much work remains to ensure the safety and effectiveness of genome editing, and questions remain about the appropriate use of germline editing. The Council supports continued research into the clinical applications of genome editing, but urges caution and thoughtful consideration before clinical germline editing is undertaken.

# REPORT OF THE COUNCIL ON SCIENCE AND PUBLIC HEALTH

CSAPH Report 3-I-16

Subject: Genome Editing and its Potential Clinical Use

Presented by: Bobby Mukkamala, MD, Chair

Referred to: Reference Committee K  
(Paul A. Friedrichs, MD, Chair)

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## 1 BACKGROUND

2  
3 The promise of gene therapy has increased substantially over the last decade due to rapid  
4 advancements in two technologies: DNA sequencing and genome engineering. Next-generation  
5 DNA sequencing techniques, reviewed by this Council in 2012, have allowed analysis of the  
6 genome and discovery of the genetic basis of disease with unprecedented speed and accuracy.<sup>1,2</sup>  
7 Concurrently, techniques have been discovered that allow modification of the genome with a level  
8 of efficiency and precision that had not previously been achieved.<sup>3</sup> One such technique, termed  
9 CRISPR-Cas9,<sup>4</sup> has triggered a surge of research efforts to harness it for correcting mutations that  
10 are disease-causing, and to understand how it could be used as a therapeutic intervention in  
11 individuals with disease.<sup>5</sup> Along with the scientific and medical advances in genome editing,  
12 ethical concerns also are evident, especially about the permanent editing of fertilized embryos,  
13 altering the genome of every differentiated cell that arises from that embryo and the offspring of  
14 that individual.<sup>6</sup>

15  
16 The Council on Science and Public Health has initiated this report to inform physicians and the  
17 House of Delegates about the remarkable advances in genome editing seen in recent years and its  
18 potential clinical applications in gene therapy, as well as concerns about it and proposals to ensure  
19 its responsible use.

## 20 21 METHODS

22  
23 Literature searches were conducted in the PubMed database for English-language articles published  
24 between 2006 and 2016 using the search terms “gene editing,” “genome editing,” and “CRISPR.”  
25 To capture reports not indexed on PubMed, a Google search was conducted using the same search  
26 terms. Genome editing information posted on the websites of the National Academies of Sciences,  
27 Engineering, and Medicine and the American Society of Human Genetics also was reviewed.  
28 Additional articles were identified by manual review of the references cited in these publications.

## 29 30 GENE THERAPY

31  
32 The concept of gene therapy, broadly defined as the use of genes or other genetic sequences to  
33 counteract or replace malfunctioning genes that cause disease, arose decades ago. Yet it has been  
34 slow in becoming a widespread therapeutic option, due in part to the complex mechanisms required

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Action of the AMA House of Delegates 2016 Interim Meeting: Council on Science and Public Health Report 2 Recommendations Adopted, and Remainder of Report Filed.

1 to deliver genetic material to the cell and drive appropriately timed therapeutic gene expression,  
2 while avoiding the disruption of endogenous cellular function.<sup>7</sup> The first successful attempt at gene  
3 therapy occurred in the early 1990s in two children with severe combined immune deficiency  
4 (SCID) caused by defects in the adenosine deaminase (ADA) gene. Normal copies of the ADA  
5 gene were inserted into their T-cells at repeated time points, resulting in sustained immune  
6 function.<sup>8</sup> Other gene therapy trials in the 1990s and 2000s were considered successful, but they  
7 were small, early-phase trials, and limited to only a few participants with very rare genetic diseases  
8 that were well characterized at the time. Challenges to using gene therapy more widely persisted,  
9 including the transient expression of genes inserted to the cell but not permanently into the cell's  
10 genomic DNA (called "transgenes"), requiring continual therapy; limitations in the ability of viral  
11 vectors to deliver functional genes to cells; insertional mutagenesis, the propensity of genetic  
12 sequences to randomly insert into genomic DNA, causing mutations and resultant disease; and  
13 immune responses to the introduced foreign DNA.<sup>7,9</sup>

14  
15 Nevertheless, research to overcome gene therapy barriers continued, and important successes have  
16 been realized. In 2015, it was reported that gene therapy was successful in several patients with  
17 Wiskott-Aldrich syndrome (WAS), a severe primary immunodeficiency caused by mutations in the  
18 WAS gene.<sup>10</sup> The trial was one of the first to use an engineered viral vector that could limit  
19 insertional mutagenesis and reduce associated complications. Other gene therapy successes have  
20 included the use of modified T-cells to treat relapses in acute lymphoblastic leukemia;<sup>11</sup> restoration  
21 of vision in patients with Leber congenital amaurosis, an inherited abnormality of the retina that  
22 causes blindness;<sup>12</sup> and reduction of bleeding episodes in patients with severe hemophilia B.<sup>13</sup>  
23 Another milestone was achieved in 2012 with the approval by the European Medicines Agency  
24 (EMA) of the first gene therapy product available in Europe. Alipogene tiparvovec, marketed as  
25 Glybera, is designed for the treatment of the rare disease lipoprotein lipase deficiency.<sup>14</sup> This year,  
26 the EMA also approved Strimvelis, a gene therapy product for the treatment of ADA-caused  
27 SCID.<sup>15,16</sup> No human gene therapy products have been approved to date by the FDA, although  
28 development of products is underway in the biotechnology industry.<sup>17</sup>

### 30 *Genome Editing*

31  
32 Progress in gene therapy is likely to accelerate with newly discovered techniques that allow for  
33 precise and permanent modification of the genome without the complications that accompany other  
34 gene therapy techniques. The risk for insertional mutagenesis is drastically reduced because the  
35 therapeutic genetic sequences used are engineered to insert into the cell's genomic DNA at precise  
36 locations.<sup>7</sup> Additionally, because the therapeutic sequence is inserted into the cell's genomic DNA  
37 rather than being expressed as a transgene, expression of it can be more tightly controlled.<sup>7</sup> Termed  
38 "genome editing" or "genome engineering," these techniques are being tested for gene therapy  
39 applications that could correct or inactivate disease-causing mutations, introduce protective  
40 mutations, insert functional genes, or disrupt foreign DNA (such as that present in viral or bacterial  
41 infections).<sup>18</sup>

### 43 HOW DOES GENOME EDITING WORK?

#### 45 *DNA Editing*

46  
47 The genome editing process is illustrated in the Figure (see page 14). It is dependent on an  
48 engineered DNA-cleaving enzyme (a nuclease) that is programmed to cut genomic DNA at specific  
49 locations. Four major classes of nucleases can be engineered for site-specific editing; of these four  
50 classes, the CRISPR-Cas9 class can be easily targeted to almost any location in the genome and  
51 carries out its nuclease activity most efficiently.<sup>19</sup> The Cas9 nuclease was first discovered in

1 bacterial adaptive immunity experiments. Bacterial genomes carry DNA sequences called  
2 “clustered regularly interspaced short palindromic repeats” (or “CRISPR”), which are located in  
3 close proximity to the coding sequence of a CRISPR-associated (“Cas”) DNA-cleaving enzyme. In  
4 bacteria, the CRISPR sequences act as guides for Cas9’s nuclease activity, providing a defense  
5 mechanism against phage infection.<sup>19</sup> Further studies demonstrated that Cas9 could be engineered  
6 to cleave the DNA of many organisms’ cells, including humans’, at specific locations by providing  
7 it with the correct guide.<sup>19,20</sup>

8  
9 Once Cas9 is engineered to cleave genomic DNA at a specific location, it can be inserted into the  
10 cell to carry out its nuclease activity. It finds the location it has been engineered to recognize and  
11 cuts both strands of the DNA (Figure). When the DNA strand is cut, the cell uses its own DNA  
12 repair mechanisms to attempt to repair the cut. Two different repair mechanisms result in different  
13 outcomes. In one mechanism, called non-homologous end joining (NHEJ), the two ends of the  
14 DNA strand that have been cut are directly rejoined.<sup>18</sup> However, this process is often inaccurate and  
15 results in the insertion or deletion of a small number of nucleotides, disrupting normal gene  
16 function (Figure). This is the genome editing mechanism used to inactivate a gene. By cutting a  
17 gene in its coding region and forcing repair through NHEJ, the small insertions or deletions that  
18 occur in the coding region suppress gene function or inactivate the gene altogether.<sup>18</sup> An example  
19 of the way in which this type of genome editing could be used therapeutically is in sickle cell  
20 disease.<sup>3</sup> Sickle cell disease is caused by mutations in the *HBB* gene, which render  $\gamma$ -globin  
21 dysfunctional. Functional  $\gamma$ -globin can be restored by upregulating the expression of the *HBG* gene.  
22 However, *HBG* is suppressed by the gene *Bcl11A*. By using genome editing to inactivate *Bcl11A*,  
23 *HBG* gene function is activated and  $\gamma$ -globin expression can be restored.<sup>3</sup>

24  
25 The other repair mechanism used by cells after the DNA strand has been cut is called homologous  
26 recombination (HR). In HR, the cell uses a DNA fragment that exactly matches the sequences  
27 surrounding the cut as a template to direct repair (Figure). Genome editing takes advantage of the  
28 use of these DNA fragments to direct repair; an exogenous DNA fragment containing a new gene  
29 or a corrected sequence of nucleotides, along with sequences that match those surrounding the site  
30 of the DNA cut, is inserted into the cell along with Cas9.<sup>18</sup> When Cas9 cuts the DNA in the  
31 location it has been engineered to recognize, the cell uses the exogenous DNA fragments as a  
32 template to repair the cut (Figure). This is the genome editing mechanism that is used to correct a  
33 mutation or insert a functional gene. The exogenous DNA repair fragment can be engineered to  
34 carry a correction to a mutation or a new functional gene that will be incorporated into the genome.  
35 In the example of sickle cell disease discussed above, this method could be used to either correct  
36 the mutation in the *HBB* gene, or insert a functional *HBB* gene in another location, restoring  $\gamma$ -  
37 globin expression.<sup>3</sup>

### 38 39 *Delivery mechanisms*

40  
41 For genome editing to occur, the engineered nuclease has to be introduced into target cells. This  
42 can occur either *ex vivo* or *in vivo*. In *ex vivo* delivery, a portion of the cell population that is  
43 targeted for editing is removed from the body, undergoes genome editing, and then is returned to  
44 the host. In this mechanism, the engineered nuclease and DNA repair fragments (for HR editing)  
45 can be introduced into the cultured target cells through several methods, including electroporation,  
46 a pulse of electricity that briefly opens pores in the cell membrane to allow the nuclease and DNA  
47 repair fragments to enter; or non-pathogenic viruses that insert the nuclease and DNA repair  
48 fragments directly into the cell.<sup>18</sup> *Ex vivo* delivery results in high editing rates, and therefore is  
49 often used for gene therapy applications. However, because it is difficult for some target cell  
50 populations to survive manipulation outside of the body, *ex vivo* delivery is usually limited to

1 tissues with adult stem cell populations that are amenable to culture and manipulation, such as  
2 those from the hematopoietic system.<sup>18</sup>

3 In *in vivo* delivery, the engineered nuclease and DNA repair fragments are delivered to targeted  
4 cells in their native environment within the body. This has been achieved by using non-pathogenic  
5 viral vectors with affinity for the target tissue; the viruses are packaged with the nuclease and the  
6 DNA repair fragments (for HR editing), which are deposited directly into the cell when the virus  
7 “infects” it.<sup>18</sup> *In vivo* delivery is preferred when the target tissue is not amenable to culture or  
8 manipulation outside of the body. It can also be used to efficiently target multiple tissue types,  
9 allowing for its therapeutic use in a wider range of diseases.<sup>18</sup> However, the viruses that can be  
10 used as vectors are sometimes limited in their affinity for multiple tissue types, and while they are  
11 non-pathogenic, the amount of virus necessary for use in therapeutic genome editing may induce an  
12 immune response.<sup>18</sup>

### 13 14 CLINICAL APPLICATIONS OF GENOME EDITING

15  
16 The most immediate uses of genome editing have been in biomedical research settings. The relative  
17 ease of using the CRISPR-Cas9 system, as well as other programmable nucleases, has triggered the  
18 modeling of human disease and proof-of-concept studies in a number of species and in human cell  
19 lines.<sup>21</sup> A few experimental uses have progressed to early clinical trial stages in humans. Selected  
20 examples that are most promising for gene therapy are discussed in this section.

#### 21 22 *Monogenic Disorders*

23  
24 Nearly 8,000 diseases are monogenic, i.e., caused by mutations in single genes.<sup>3</sup> Many of these  
25 diseases are candidates for gene editing because, simplistically speaking, the modification needed  
26 is only in one gene. At this time, successful genome editing for several monogenic diseases has  
27 been achieved in model organisms. For example, in a mouse model of Duchenne muscular  
28 dystrophy (DMD), which mimics the human form of DMD with a mutation in the *dystrophin* gene,  
29 a viral vector was used to deliver Cas9 *in vivo* to mouse muscle cells.<sup>22-25</sup> The Cas9 was engineered  
30 to cut the *dystrophin* gene in two places flanking the mutation, thereby removing the mutation from  
31 the cells’ genomic DNA, then the cut ends of *dystrophin* were repaired by the NHEJ mechanism.<sup>22-  
32 25</sup> The technique only partially restored Dystrophin protein function, but it was enough to restore  
33 partial muscle function in the mice. Particularly exciting was the finding that gene editing occurred  
34 in satellite cells, stem cells that are present in muscle, implying that the satellite cells could  
35 populate the muscles with cells carrying the partially repaired *dystrophin* gene.<sup>25</sup>

36  
37 Preclinical studies using genome editing to correct the mutations that cause cystic fibrosis have  
38 also been promising. Organoids are small amounts of functional tissue derived from human stem  
39 cells. In intestinal organoid tissue derived from patients carrying mutations in the *CFTR* gene,  
40 which causes cystic fibrosis, the CRISPR-Cas9 system was used to correct the mutations through  
41 the HR mechanism.<sup>26</sup> The corrected *CFTR* was fully functional and was able to “rescue” the cystic  
42 fibrosis phenotype in the organoids.<sup>26</sup> Together with other experiments showing that cultured  
43 intestinal organoids can be transplanted into and become functional in the colons of mice,<sup>27</sup> this  
44 provides a potential strategy for gene therapy in patients with cystic fibrosis.

45  
46 Other studies demonstrated successful proof-of-concept results using genome editing for the  
47 treatment of many other monogenic diseases, including hemophilia B, hereditary tyrosinemia,  
48 ADA-caused SCID, sickle cell disease, and  $\beta$ -thalassemia.<sup>3,18,19</sup> The biotechnology company Editas  
49 has stated that it will begin a clinical trial in 2017 using CRISPR-Cas9 as a gene therapy  
50 mechanism to correct mutations causing Leber congenital amaurosis.<sup>28</sup>

1 *Cancers*

2  
3 With more than 1.5 million cases of cancer diagnosed and half a million deaths from cancer each  
4 year,<sup>29</sup> the prospect of treating cancer using genome editing-based technologies is appealing.  
5 However, it is widely thought that direct repair of acquired or inherited mutations in cancer cells  
6 would not be effective.<sup>18</sup> Mutations in cancer cells give them a fitness advantage over non-  
7 cancerous cells, i.e., they divide quickly and do not respond to the cells' signals to halt growth or  
8 self-destruct. Even the most efficient genome editing could not repair every cancer cell present in a  
9 tissue or throughout the body, so cancer cells with repaired mutations would quickly be  
10 outcompeted by their non-repaired counterparts, rendering the therapy ineffective.<sup>18</sup>

11  
12 Despite the inability to directly correct mutations in cancer cells, research has shown exciting  
13 results using engineered T-cells to harness the immune system's ability to fight cancer. T-cells are  
14 harvested from patients with certain types of cancer, engineered to express receptors that have  
15 specific and strong affinity for tumor antigens, and then infused back into patients, where they  
16 attack tumor cells.<sup>30,31</sup> This technique has been the most successful in trials for melanomas and  
17 leukemias and lymphomas of B-cell origin.<sup>31</sup>

18  
19 Genome editing is now being explored as a technique to engineer T-cells that more stably and  
20 permanently express the receptors that target them to cancer cells. In June 2016, the National  
21 Institutes of Health approved a proposal to use the CRISPR-Cas9 system to edit T-cells from  
22 patients with one of three cancer types: multiple myeloma, sarcoma, or melanoma.<sup>32</sup> The genome  
23 editing will include inserting a gene that helps the T-cells better recognize cancer cells, inactivating  
24 a gene that interferes with the recognition process, and inactivating a gene that allows cancer cells  
25 to prevent T-cell attacks.<sup>32</sup> Recruitment could begin late in 2016, once FDA and institutional  
26 review board approval are granted.<sup>33</sup> Another trial using genome-edited T-cells is set to begin this  
27 year in China in patients who have metastatic non-small cell lung cancer and for whom  
28 chemotherapy, radiation therapy, and other treatments have failed. In that trial, CRISPR-Cas9 will  
29 be used to inactivate the gene that encodes PD-1, which normally acts as a check on the cell's  
30 capacity to launch an immune response.<sup>34</sup>

31  
32 *Non-Genetic Disorders*

33  
34 In addition to the use of genome editing to correct diseases caused by genetic mutations, it also is  
35 being investigated for use in treating infectious diseases and a variety of other health conditions.  
36 For example, the discovery that patients who carry mutations disabling the HIV receptor CCR5 are  
37 nearly completely resistant to HIV infection provided the basis for a genome editing-based clinical  
38 trial for treating HIV. A small, early-phase clinical trial removed T-cells from patients with HIV,  
39 used an engineered nuclease to mutate the *CCR5* gene, and then transplanted the edited T-cells  
40 back into the patients.<sup>3,18,35</sup> Preliminary results showed that in the majority of patients receiving the  
41 edited T-cells, HIV DNA levels in the blood decreased, and in one patient, HIV was undetectable.<sup>35</sup>  
42 Unlike the fitness disadvantage that directly edited cancer cells have when compared to their non-  
43 edited counterparts, T-cells with the edited *CCR5* gene have a fitness advantage over the non-  
44 edited T-cells; in the trial, the edited T-cell population had lower rates of cell death than did non-  
45 edited T-cells, suggesting that they are more stable.<sup>35</sup> Complete removal of the virus will be  
46 challenging, however, and will depend on extremely efficient delivery and editing strategies;<sup>18</sup>  
47 phase II trials are now ongoing to test such strategies. Similar genome editing mechanisms have  
48 also shown promising results in treating hepatitis B virus infection.<sup>36,37</sup>

1  
2 Genome editing also is being explored as a therapy to reduce cardiovascular disease risk. The gene  
3 *PCSK9* was recently discovered as a modulator of LDL cholesterol function. People carrying  
4 dominant gain-of-function mutations in *PCSK9* have highly elevated LDL level and premature  
5 coronary heart disease, and those carrying homozygous loss-of-function mutations have a nearly 80  
6 percent reduction in LDL level with no apparent adverse clinical consequences.<sup>38,39</sup> PCSK9-  
7 targeting monoclonal antibodies are currently being tested in clinical trials as LDL-lowering  
8 therapies.<sup>40</sup> Genome editing of *PCSK9* has been tested in the pre-clinical setting. A viral vector was  
9 used for *in vivo* delivery of Cas9, engineered to introduce mutations in the *PCSK9* gene using the  
10 NHEJ mechanism, to liver cells of mice.<sup>41</sup> Editing occurred in more than half of the liver cells, and  
11 resulted in a 35-40 percent reduction in total cholesterol and reduced LDL plasma fractions.<sup>41</sup> This  
12 study has contributed to the notion that the future of cholesterol management may first be a bi-  
13 weekly or monthly intervention using PCSK9-inhibitor antibody drugs, then eventually become a  
14 one-time intervention that permanently and selectively modifies the genome to inactivate *PCSK9*  
15 and thereby reduce cholesterol.<sup>42</sup>

## 16 17 CONSIDERATIONS BEFORE CLINICAL USE

18  
19 The pace of exploration of genome editing as a potential tool for gene therapy has been rapid in  
20 recent years. However, translation of applications to the clinic will require the careful consideration  
21 of a number of factors, including the safety of the technology, its possible use in editing the  
22 germline, and high costs that could result in access problems and health disparities.

### 23 24 *Safety*

25  
26 The specificity of engineered nucleases, i.e., their ability to cut DNA at precisely targeted positions  
27 and avoid cutting at non-targeted locations, will be a key factor in the translation of this mechanism  
28 of gene therapy into clinical practice. Genetic modifications resulting from genome editing are  
29 permanent, so off-target modifications could create cells with functional impairment or even  
30 oncogenic potential. CRISPR-Cas9 genome editing appears to result in only rare instances of off-  
31 target modification; one study estimated that one error in 300 trillion base pairs could occur, and  
32 given that the human genome is only 3 billion base pairs, that equates to one off-target  
33 modification per 100,000 cells.<sup>43</sup> However, more sophisticated methods are needed for evaluating  
34 the likelihood of off-target modification for each potential clinical use, and studies are ongoing to  
35 develop ways of preventing off-target modification.<sup>44,45</sup> Clinical use of genome modification would  
36 not be appropriate without mechanisms to ensure that off-target modifications are extremely rare  
37 and result in negligible clinical consequence.<sup>18,46</sup>

38  
39 Another safety concern lies with using viral vectors as delivery mechanisms. Adeno-associated  
40 virus (AAV) vectors are approved for clinical use,<sup>47</sup> and have high delivery efficacy for a number  
41 of tissue types. But AAV vectors pose some challenges. In some cases, nucleases packaged within  
42 AAV vectors are constitutively active, increasing the chances of off-target modification.<sup>18</sup> Also,  
43 many people who have been naturally exposed to AAV have developed immunity to it, so it may  
44 not be an appropriate delivery mechanism for them.<sup>18</sup> Immunotoxicity also may occur upon  
45 exposure to certain engineered nucleases, including Cas9, since they are microbially derived.<sup>48</sup>  
46 Alternative delivery systems, including lipids and nanoparticles, are being explored to avoid the  
47 potential for immunotoxicity.<sup>49,50</sup>

### 48 49 *Germline Editing*

50

1 The most ethically-fraught conversations about genome editing center on the use of the technology  
2 to modify the genome of germline cells (eggs and sperm) or early-stage embryos. Such editing  
3 would result in permanent modifications to the individual arising from the germline cells or  
4 embryo, and would permanently change the gene pool since those modifications would be passed  
5 on to future generations. Conversations about these issues took on new urgency when researchers  
6 in China demonstrated that CRISPR-Cas9 could be successfully used to edit the genome of early-  
7 stage human embryos.<sup>51</sup> The embryos used in the study were genetically incapable of maturing into  
8 viable zygotes, and important limitations in the efficiency of CRISPR-Cas9 in human embryos  
9 were discovered, but the study nonetheless illustrated the application of genome editing to human  
10 embryos before ethical standards for its use have been widely promulgated. Further evidence that  
11 genome editing is close to being used in human embryos comes from a study that used CRISPR-  
12 Cas9 to induce genome modifications in one-cell stage embryos of cynomolgus monkeys, resulting  
13 in live births.<sup>52</sup> Cynomolgus monkeys are so genetically close to humans that they are often used to  
14 model human disease. The genome-edited animals are now being studied to determine the  
15 efficiency of the editing and potential health consequences stemming from it.<sup>52</sup>

16  
17 Several organizations, including the National Academies of Sciences, Engineering, and Medicine  
18 (NASEM) and the American Society of Human Genetics (ASHG), have convened expert working  
19 groups to study the issue and define principles by which germline editing should or should not  
20 occur. Discussions center on the use of genome editing to treat or cure diseases for which no other  
21 equally effective therapy exists, and what types of disorders are sufficiently debilitating that  
22 extreme measures like genome editing are needed. The case for germline editing is most  
23 compelling when both parents are homozygous for a disease-related gene variant; however, that is  
24 a rare occurrence.<sup>53</sup> Another question that arises is whether genome editing has any value over  
25 preimplantation genetic diagnosis, which allows prospective parents who carry heritable disease-  
26 causing genes to select embryos lacking those genes.<sup>54</sup> Genome editing for complex polygenic  
27 diseases is likely not possible because those genes usually have very weak effects on their own and  
28 are often involved in a variety of physiological functions, some of which may be beneficial.<sup>53,54</sup>  
29 Discussions also focus on the potential for non-medical use of germline editing, such as for  
30 selecting desirable traits, and the autonomy of parents to make genetic modifications in their  
31 offspring, who themselves are not able to consent.<sup>53</sup>

32  
33 NASEM, along with the Royal Academy and the Chinese Academy of Sciences, held a summit late  
34 in 2015 during which a committee of scientific and ethics experts discussed genome editing and  
35 developed conclusions about its use.<sup>55</sup> The consensus conclusions support preclinical research on  
36 genome editing, as well as its use in somatic gene therapy concordant with regulatory law.  
37 However, the committee does not support clinical use of germline editing until “(i) the relevant  
38 safety and efficacy issues have been resolved, based on appropriate understanding and balancing of  
39 risks, potential benefits, and alternatives, and (ii) there is broad societal consensus about the  
40 appropriateness of the proposed application.”<sup>55</sup> The committee will complete a comprehensive  
41 study of the scientific underpinnings of human genome editing technologies, their potential use in  
42 biomedical research and medicine, including human germline editing, and the clinical, ethical,  
43 legal, and social implications of their use by late 2016.<sup>56</sup>

44  
45 Similarly, ASHG has convened a Workgroup on the Implications of Genome Editing to craft policy  
46 on genome editing; in addition to ASHG, the Canadian Association of Genetic Counselors,  
47 International Genetic Epidemiology Society, National Society of Genetic Counselors, and  
48 Association of Genetic Nurses and Counselors (United Kingdom and Ireland) participated in the  
49 Workgroup.<sup>57</sup> It developed a draft policy outline that supports research into the use of germline  
50 editing as long as it does not culminate in a human pregnancy, and believes that clinical application  
51 should not proceed unless, at a minimum, there is “a) a compelling medical rationale, b) an

1 evidence base that supports its clinical use, c) an ethical justification, and d) a transparent public  
2 process to solicit and incorporate stakeholder input.”<sup>57</sup> ASHG has solicited member comments on  
3 the draft policy and will finalize it in the coming months.

4 The AMA Code of Medical Ethics contains similar sentiments regarding gene therapy and genetic  
5 engineering. Opinion 7.3.6, “Research in Gene Therapy & Genetic Engineering,” states that genetic  
6 manipulation should be reserved for therapeutic purposes, and that efforts to enhance “desirable”  
7 characteristics are contrary to the ethical tradition of medicine. It sets out a number of conditions  
8 that should be met before physicians engage in research involving gene therapy or genetic  
9 engineering, including evidence that the intervention will be safe and effective, that no other  
10 suitable or effective therapies are available, and that it is restricted to somatic cells. The full  
11 opinion is in the Appendix. The Council believes that the principles set forth in Opinion 7.3.6  
12 should guide AMA policy on genome editing.

#### 13 14 *Costs and Health Disparities*

15  
16 As is the case for many expensive therapies, access problems are likely to occur if genome editing-  
17 based gene therapies become viable clinical options. Use of the first gene therapy product approved  
18 by the EMA, Glybera, has been limited to only one patient because it carries a price tag of more  
19 than \$1 million. It was covered by the patient’s insurance company, but only after her physician  
20 worked intensely to obtain authorization.<sup>16</sup> It is not known what the cost of the newly EMA-  
21 approved gene therapy Strimvelis will be, but its manufacturer, GlaxoSmithKline, has stated that it  
22 will be “significantly less” than the \$1 million mark.<sup>16</sup> According to the manufacturer of Glybera,  
23 UniQure, the high cost of gene therapy drugs is based on the substantial development costs, the fact  
24 that the market for the rare diseases they treat is exceptionally small, and in Glybera’s case, that it  
25 is administered only once, rather than repeatedly over a period of time.<sup>58</sup> Compared to the \$250,000  
26 per year average cost of other orphan drugs that treat rare diseases, a one-time dose of a \$1 million  
27 drug could be considered cost-saving. However, that cost is so high that it is unlikely patients who  
28 need the therapies could afford them, or that insurance companies would authorize payment. This  
29 undoubtedly would create health disparities issues, in which only the wealthiest patients, or those  
30 fortunate enough to have coverage through insurers who will approve the therapy, could have  
31 access to it. Although Glybera and Strimvelis are based on transgene expression rather than  
32 permanent genome modification, it is reasonable to assume that genome editing-based gene  
33 therapies would have similarly expensive development processes, leading to high costs for patients.

#### 34 35 CONCLUSIONS

36  
37 The last few years have seen unprecedented progress in the development of genome editing  
38 mechanisms and their potential applications for gene therapy. While most research is at the  
39 preclinical stages, a small number of clinical trials in humans have begun, with others planned for  
40 the near future. Much work remains to ensure the safety and effectiveness of genome editing, and  
41 questions remain about the appropriate use of germline editing. The Council supports continued  
42 research into the clinical applications of genome editing, but urges caution and thoughtful  
43 consideration before clinical germline editing is undertaken. The Council also urges continued  
44 work to develop international consensus standards for permissible therapeutic uses of germline  
45 editing.

#### 46 47 RECOMMENDATIONS

48  
49 The Council on Science and Public Health recommends that the following statements be adopted  
50 and the remainder of the report be filed.

1

2 1. That our American Medical Association (AMA) encourage continued research into the  
3 therapeutic use of genome editing. (New HOD Policy)

4 2. That our AMA urge continued development of consensus international principles, grounded in  
5 science and ethics, to determine permissible therapeutic applications of germline genome  
6 editing. (New HOD Policy)

Fiscal Note: Less than \$1000

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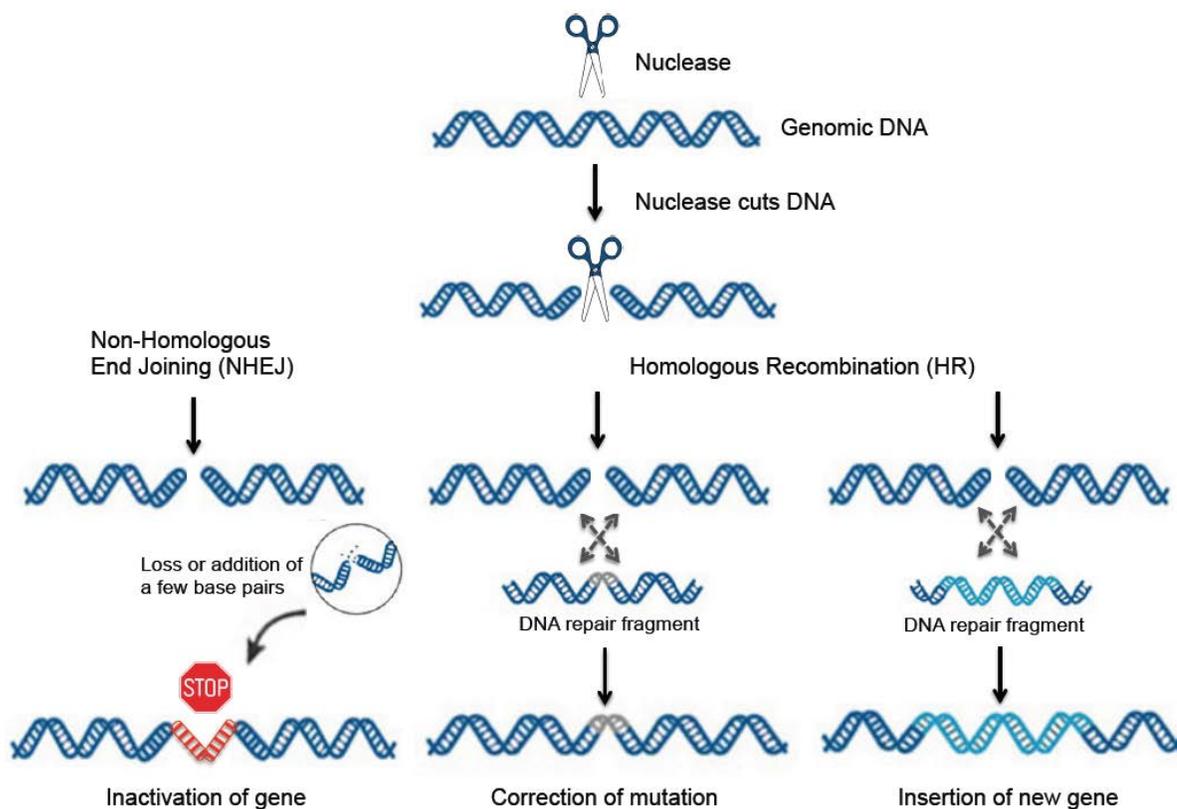
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Figure. The genome editing process.



A nuclease engineered to cleave genomic DNA at a precise location is inserted into the cell. Once the DNA is cut, the cell uses either non-homologous end-joining (NHEJ) or homologous recombination (HR) to repair the cut. In NHEJ, the two ends of the DNA strand that have been cut are directly rejoined, but this process results in the insertion or deletion of a small number of nucleotides, disrupting normal gene function. In HR, an exogenous DNA fragment containing a new gene or a corrected sequence of nucleotides, along with sequences that match those surrounding the site of the DNA cut, is inserted into the cell. The cell uses the exogenous DNA fragment as a template to repair the cut, incorporating the sequence present into the genomic DNA, correcting a mutation or inserting a functional gene. (Figure adapted from <http://www.calyxt.com/technology/targeted-genome-editing/>.)

Appendix. AMA Code of Medical Ethics, 7.3.6, Research in Gene Therapy & Genetic Engineering

Gene therapy involves the replacement or modification of a genetic variant to restore or enhance cellular function or to improve response to nongenetic therapies. Genetic engineering involves the use of recombinant DNA techniques to introduce new characteristics or traits. In medicine, the goal of gene therapy and genetic engineering is to alleviate human suffering and disease. As with all therapies, this goal should be pursued only within the ethical traditions of the profession, which gives primacy to the welfare of the patient.

In general, genetic manipulation should be reserved for therapeutic purposes. Efforts to enhance “desirable” characteristics or to “improve” complex human traits are contrary to the ethical tradition of medicine. Because of the potential for abuse, genetic manipulation of nondisease traits or the eugenic development of offspring may never be justifiable.

Moreover, genetic manipulation can carry risks to both the individuals into whom modified genetic material is introduced and to future generations. Somatic cell gene therapy targets nongerm cells and thus does not carry risk to future generations. Germ-line therapy, in which a genetic modification is introduced into the genome of human gametes or their precursors, is intended to result in the expression of the modified gene in the recipient’s offspring and subsequent generations. Germ-line therapy thus may be associated with increased risk and the possibility of unpredictable and irreversible results that adversely affect the welfare of subsequent generations.

Thus in addition to fundamental ethical requirements for the appropriate conduct of research with human participants, research in gene therapy or genetic engineering must put in place additional safeguards to vigorously protect the safety and well-being of participants and future generations.

Physicians should not engage in research involving gene therapy or genetic engineering with human participants unless the following conditions are met:

- (a) Experience with animal studies is sufficient to assure that the experimental intervention will be safe and effective and its results predictable.
- (b) No other suitable, effective therapies are available.
- (c) Gene therapy is restricted to somatic cell interventions, in light of the far-reaching implications of germ-line interventions.
- (d) Evaluation of the effectiveness of the intervention includes determination of the natural history of the disease or condition under study and follow-up examination of the participants’ descendants.
- (e) The research minimizes risks to participants, including those from any viral vectors used.
- (f) Special attention is paid to the informed consent process to ensure that the prospective participant (or legally authorized representative) is fully informed about the distinctive risks of the research, including use of viral vectors to deliver the modified genetic material, possible implications for the participant’s descendants, and the need for follow-up assessments.

Physicians should be aware that gene therapy or genetic engineering interventions may require additional scientific and ethical review, and regulatory oversight, before they are introduced into clinical practice.