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3 **Stem cells as an emerging paradigm in stroke (STEPS) 4:**
4 **advancing and accelerating preclinical research**

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32

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35

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38

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42 **Introduction**

43 The scientific community has continuously advanced promising treatment concepts for
44 cell-based therapies in stroke. These approaches principally aim to modulate post-ischemic
45 immune responses and augment endogenous repair. Another aim currently under study at the
46 bench level is to transplant new tissue and restore neural circuits. Many stem and non-stem cell
47 populations have shown encouraging efficacy in preclinical models, and selected types of cell
48 therapies are currently undergoing testing in clinical trials.¹⁻⁴

49 Recent mechanistic studies have tremendously advanced our understanding of the
50 different parameters that influence experimental stroke therapies. While cell therapies offer
51 unprecedented therapeutic time window expansions of days to weeks (and possibly even
52 months to years after stroke), there are several potential factors that may affect their impact.
53 These include age⁵, comorbidities^{6,7}, concurrent medications⁸, and even chronobiological
54 mechanisms.⁹ In theory, thorough preclinical research should take into account all of these
55 factors or at least their most relevant combinations. However, budgetary constraints, the lack
56 of adequate *in vitro* and *in vivo* models, and the enormous amount of time required to address
57 the multitude of relevant factors severely impairs such attempts in research practice. This
58 dilemma affects current and future translational work and thus requires careful consideration.

59 The Stem Cell Therapies as an Emerging Paradigm in Stroke (STEPS) meetings have
60 regularly brought together academic and industry leaders and experts from regulatory
61 authorities to discuss the latest developments in cell therapies for stroke and to publish
62 recommendations for preclinical and clinical research.¹⁰⁻¹² The fourth STEPS meeting aimed to
63 update previous preclinical guidelines with respect to novel stroke models, biomaterials, and
64 advanced approaches combining cell therapies with biomaterials, drugs, or neurorehabilitation.
65 STEPS delegates further provide new recommendation on preclinical study designs including
66 multi-center preclinical trials (MCPTs) and suggest a strategy to accelerate and improve clinical
67 translation of cell therapies for stroke without sacrificing scientific rigor and patient safety. This

68 can be achieved by a close interlink of preclinical and clinical studies while targeting particular
69 stroke patient subpopulations. Main recommendations are summarized at the end of the STEPS
70 4 report.

71

72 **Part I: Updated preclinical guidelines**

73 *Stroke model selection in the era of recanalization therapies*

74 We recommend selecting models that best represent the clinical population targeted with
75 a particular cell therapy. The recent advent of mechanical thrombectomy has changed the
76 clinical landscape, and the application of cell therapies are discussed directly after
77 recanalization.¹³ Transient models should be selected when investigating this scenario. The
78 filament model is widely used to represent mechanical recanalization¹⁴; however, its use for
79 long-term studies poses some limitations due to large infarcts associated with high mortality.¹⁵
80 Thromboembolization followed by thrombolysis is a clinically important model for testing cell
81 therapies in the context of thrombolysis.¹⁶ Moreover, reperfusion is often incomplete in patients
82 undergoing thrombolytic therapy or spontaneous recanalization. This is also observed in
83 spontaneously hypertensive rats that can serve as a model for these conditions¹⁷ while also
84 exhibiting other important stroke comorbidities. Total reperfusion failure or persistent
85 occlusion can be modelled by permanent MCAO.

86

87 *Large animal models*

88 The gyrencephalic brain featured by large animal models (LAMs) is bigger than the
89 rodent brain and more suitable for sophisticated clinical imaging approaches.^{18,19} Grey-to-
90 white-matter ratio approximates that of humans.⁹ LAMs allow more realistic and precise testing
91 of cell delivery techniques including stereotaxic and intra-arterial cell administration, and dose
92 translation to human clinical trials. Cell migration and paracrine effects, as in the human brain,
93 are challenged by larger anatomic distances. LAMs are also suitable to investigate stroke

94 sequelae such as cognitive impairment and decline²⁰, and are further recommended to assess
95 the value of potential biomarkers indicating cell therapy safety and efficacy.

96 On the other hand, LAM studies typically involve smaller sample sizes as they are more
97 expensive and require dedicated infrastructure. Major endpoints including functional outcome
98 and lesion size tend to be more variable than in standardized rodent studies. Although
99 resembling the situation in human patient cohorts, these issues can significantly reduce study
100 power.²¹ LAMs are therefore of limited use in exploratory cell therapy studies. Meaningful
101 LAM experiments require a precise understanding of the addressed endpoint(s), as well as of
102 sample and effect sizes. Nevertheless, LAMs are highly valuable translational tools when
103 considering their limitations and employing them in well-planned confirmative studies.¹¹
104 Funding bodies are encouraged to support research using LAMs in such scenarios, particularly
105 when critical information on patient safety and delivery route efficiency can be obtained.

106

107 *Sex differences, age, and comorbidities*

108 In line with previous recommendations^{11,12}, the STEPS group recommends testing cell
109 therapies in animal models of different age, sex, and comorbidities. However, we also recognize
110 that modeling these variables, especially comorbidities, has limitations due their multitude and
111 complexity. The impact of these factors might be better investigated in large phase III clinical
112 trials allowing for sub-hoc analyses of patient populations with respective comorbidity profiles,
113 or in MCPTs combining the capacities of many labs. An alternative approach (outlined in part
114 III) is to focus on stroke patient subpopulations with particular stroke configuration and
115 comorbidity profiles, and to design preclinical studies accordingly.

116

117 *Dose escalation studies: novel implications*

118 In line with previous recommendations^{10,11} and in light of the neutral results from the
119 MASTERS (multipotent adult progenitor cells given intravenously, NCT01436487) and

120 ACTISSIMA (SB623 administered intracerebrally, NCT02448641) trials that may partially be
121 related to dosing issues, the STEPS group continues to recommend efficacy-focused preclinical
122 dose escalation studies for all routes of administration. Intra-arterial administration of cells may
123 cause microvascular obstruction under certain circumstances.²² Hence, dose escalation studies
124 are not only important for preclinical efficacy assessments, but are highly recommended when
125 assessing safety aspects. This particularly accounts for intra-arterial or more invasive
126 application routes. Methods capable of predicting the target territory of cell infusions may help
127 to optimize the safety profile. LAMs may be suitable to simulate clinical transplantation
128 scenarios regarding vessel dimensions and imaging-based surveillance.²³

129

130 *Drug-cell interactions*

131 It is likely in clinical scenarios that patients receiving cell therapy also receive
132 medications for stroke comorbidities and for secondary prevention. Cell therapies may further
133 be combined with pharmacological treatments to enhance their therapeutic impact.²⁴ Given the
134 paracrine effects of many cell therapies, interactions between drugs and cells cannot be
135 excluded. This important aspect requires careful consideration when moving towards the clinic,
136 but little is known about these potential interactions. Detrimental effects were seen when
137 combining granulocyte-colony stimulating factor and bone marrow mononuclear cells, each of
138 which is effective as a stand-alone treatment in rodents.^{25,26} On the other hand, synergistic
139 effects have been reported for the combination of cell therapies with other commonly prescribed
140 medication such as statins.²⁷

141 The STEPS 4 group recommends more research on potential drug-cell interactions in
142 appropriate *in vitro* and in *in vivo* test systems. Drug classes being predominantly used in stroke
143 patients, such as antiplatelets, anti-hypertensive, and statins, should be the main focus. We
144 further suggest testing on autologous cell preparations when applied in patients receiving
145 multiple medications. These tests can be tailored to the medication profile of individual patients.

146

147 *Biomaterials*

148 Biomaterials are increasingly being incorporated for the delivery of cells to reduce shear
149 stress induced by needle injections^{28,29} but also to provide factors that improve post-
150 transplantation cell survival.^{30,31} Scaffolds can support transplanted cells inside the lesion
151 cavity³² by providing structural cues and biochemical signals.^{33,34} Post-stroke tissue
152 restoration³⁵, and a guided neuronal differentiation³⁶ can be achieved using biomaterials
153 engineered to release growth factors, mediators of angiogenesis, or immunomodulators in a
154 temporal sequence and without exerting systemic side effects.³⁷⁻³⁹ A systematic optimization of
155 a hydrogel, for instance, improved the survival of human neural stem cells implanted into the
156 stroke-damaged brain and controlled their differentiation. However, it remains unclear if the
157 combined use of biomaterials and cells will transfer to further improvements in functional
158 recovery. To date, most studies combining biomaterials and cells for transplantation are of an
159 exploratory rather than definitive/confirmative nature. We therefore recommend long-term
160 studies to investigate the safety and efficacy profile of biomaterial applications once a basic
161 therapeutic benefit has been shown. LAMs may help to optimize application procedures. Early
162 involvement of regulatory authorities, ideally already during early-stage preclinical research, is
163 recommended, as biomaterial-cell combinations are challenging from a regulatory perspective.

164

165 *Neurorehabilitation*

166 Most stroke survivors receive some form of rehabilitation. Thus, neurorehabilitation is
167 important to consider when developing cellular therapies for stroke. Indeed, treadmill running
168 and intravenous delivery of mesenchymal stem cells together improve behavioral recovery in
169 animals with ischemic stroke.^{40,41} Timing of such combination therapy is crucial when targeting
170 stroke recovery as there is a sensitive phase for neurorehabilitation (Fig. 1A). It is possible that
171 some cell therapies might re-open a plasticity time window in chronic stroke, and

172 neurorehabilitation may be beneficial in such scenarios by stabilizing the recovered functions.
173 The recent Stroke Recovery and Rehabilitation Roundtable (SRRR)-1¹⁵ and SRRR-2⁴²
174 recommendations are valuable in designing preclinical rehabilitation studies and in improving
175 clinical translation. However, as in the case of comorbidities, including rehabilitation renders
176 study designs complex and difficult to implement. Also, the effects of add-on
177 neurorehabilitation should be discriminated from stand-alone cell therapies, which may be
178 challenging as shown recently with adipose tissue-derived stem cells and enriched
179 environments.⁴³ Routine investigation of cell therapy in combination with neurorehabilitation
180 is recommended when significant additional therapeutic effects are expected from this
181 combination, or when the combination is a central mode of action.

182

183 **Part II: New considerations on preclinical study designs**

184 *Potential new models and targets: lacunar, white matter, and hemorrhagic strokes*

185 Most preclinical studies model large territorial infarcts. However, other important
186 clinical target populations are patients with smaller infarcts in the subcortical grey and white
187 matter. Importantly, the smaller volume of the infarct and the preservation of some anatomical
188 tissue structures may foster repair.⁴⁴ Small deep white matter infarcts may be particularly
189 suitable for cells (e.g. glial progenitors) capable of or intended for tissue restoration⁴⁵ and might
190 be responsive to cell-borne local paracrine mechanisms. We recommend to consider such stroke
191 types (see supplementary table) as alternative targets to large territorial infarcts and/or when
192 working on tissue-restorative cell therapies.

193 Intracerebral hemorrhage (ICH)⁴⁶ involves pathogenic mechanisms that may provide
194 novel cell therapy targets. Hemoglobin breakdown products (HBPs), such as hemin, damage
195 axons and induce ferroptosis and necroptosis in distant, primarily intact neuronal somata.⁴⁷
196 These processes might be mitigated or reversed by factors released from therapeutic cells.
197 Smaller hemorrhagic lesions or damage caused by HBPs may also be promising targets for

198 tissue regeneration approaches. Furthermore, peripheral and central inflammatory processes
199 also contribute to further brain injury after ICH and these mechanisms might make excellent
200 targets for some cell-based therapies.

201

202 *Preconditioning of cell transplants*

203 Long-term survival of transplanted cells is an important aspect for approaches that target
204 long-term engraftment of neural stem cells to support or repair damaged neuronal circuits, or
205 for which long-term trophic support is required. While cell survival has been poor in most
206 previous studies, recent advantages were made in the field of cell preconditioning.^{48,49} These
207 techniques can significantly enhance and/or prolong survival of transplanted cells and should
208 be considered for approaches that may benefit thereof.

209

210 *Behavioral readout parameter selection*

211 Functional tests should be sensitive to detect long-term impairment and treatments
212 effects, but not be affected by repeated testing or compensation.²⁰ Various reaching tasks, foot
213 fault, cylinder and adhesive tests provide quantitative and objective assessment in efficacy
214 studies.¹⁵ Simpler tasks can overestimate treatment effects but are valuable for exclusion of
215 stroke animals with no/minor impairment, stratification regarding impairment severity, and
216 treatment assessment during the acute phase. Appropriate tests should be selected for the
217 respective stroke model, species, scenario, and study duration (Fig. 1B).

218 Smaller lesions require particularly sensitive and precise behavioral outcome measures.
219 These lesions are more sensitive for functional compensation/spontaneous recovery and
220 impairments may be masked. Automated readout systems carry high specificity and sensitivity
221 and are being increasingly used in neurodegenerative disorders with initial subtle motor
222 deficits.⁵⁰ The supplementary table summarizes information on specific deficits and their

223 measurement in lacunar lesions. Lastly, cognitive impairment and depression are common
224 stroke complications, but at present there is no consensus on which tests to use in animals.

225

226 *Safety assessments as a focus*

227 Definitive demonstration of safety across multiple preclinical endpoints will be an invaluable
228 resource when advancing cellular therapies for stroke treatment. The cell administration site
229 should be evaluated for signs of inflammation or edema as well as acute respiratory problems
230 for intravenous delivery to ensure the cell therapy is not inducing local or systemic immune
231 responses. This may include animals with a humanized immune system. When performing
232 repetitive administration of a cells, recipient sensitization (e.g., by lymphocyte proliferation
233 assays), indicating adaptive immune system activation, should be contemplated.

234 Short- and long-term biodistribution and possible cell engraftment should be evaluated
235 to determine cell persistence, particularly if the intended goal is engraftment. However, cell
236 types exerting paracrine and immunomodulatory mechanisms, or exogenous cells may not
237 persist which is viewed as an attractive component of approaches for which cell survival is not
238 necessarily required. Complete endpoint evaluations of tissues and organ systems should be
239 performed to definitively demonstrate that the cell administration does not have any off-target
240 effects. Abnormal tissue growth, tumorigenesis or aberrant ectopic fiber sprouting should be
241 excluded when using pluripotent stem cells or other cell types with high proliferation,
242 differentiation, and fiber projection capabilities.

243

244 *Multicenter trials*

245 Innovative preclinical study designs including MCPTs have been proposed since the last
246 STEPS recommendations. MCPTs mimic the design of large scale, efficacy-centered clinical
247 trials with rigorous implementation of quality assurance measures as performed in clinical
248 research.⁵¹ MCPTs are believed to enhance predictive value and statistical power in preclinical

249 research, and to provide a close-to-practice assessment of the potential treatment. They may be
250 of particular value when assessing cell therapies with mild to moderate impact on stroke (i.e.
251 improvements of 10 to 20%)⁵² or when assessing the impact of multiple therapy-influencing
252 factors. MCPTs can also help to verify the benefit of combination therapies. This requires
253 greatly enhanced statistical power to discriminate the effect of the combination from the impact
254 of the individual therapies (e.g., rehabilitation plus cell therapy). The MCPT concept has been
255 well received throughout the stroke community^{53,54}, and first MCPTs revealed effect sizes being
256 considerably lower than what would have been expected from standard single center preclinical
257 studies.⁵⁵

258 However, MCPTs are more challenging to harmonize and carry much higher costs than
259 standard study designs. Industry may benefit from MCPTs prior to initiating a clinical study.⁵⁶
260 The STEPS 4 consortium recommends considering MCPTs as an option when planning a
261 translational research program in cell therapy for stroke. Importantly, NIH recently supported
262 the creation of MCPTs and has launched the Stroke Preclinical Assessment Network (SPAN)
263 program currently focused on multicenter evaluations of acute neuroprotectants as a
264 complementary treatment to recanalization. Industry participation is highly encouraged in
265 SPAN. Experience from the program will be invaluable to learn how MCPTs can be organized
266 best to fully benefit from the enhanced power in assessing complex treatments, and how the
267 complex logistics of MCPTs can be mastered. Ideally, successful SPAN activities will serve as
268 a role model for MCPTs in cell therapies.

269

270 *Potency assay development and qualification*

271 A new recommendation from the STEPS group is the development of surrogate potency
272 assays. Demonstrating a direct measurable correlation between a cell therapy and a biomarker
273 or another quantifiable biological process with a beneficial outcome is critical to monitor the
274 hypothesized mechanism of action. Biomarkers for putative mechanisms of action are also

275 critical to regulators for late stage clinical trial authorization. Biomarkers might be used to
276 develop potency assays that should be robust, specific, informative, and reproducible in
277 describing a fundamental biological effect of the expected benefit. Qualified potency assays are
278 “locked down” as part of phase III clinical testing. They need to be transferred and performed
279 under Good Manufacturing Practice (GMP) conditions before officially filing for product
280 approval with the Food and Drug Administration in the United States. The development of
281 potency assays during preclinical animal testing is therefore paramount prior to moving cellular
282 therapies into advanced stages of clinical trials. As hypotheses change to reflect advances in the
283 fundamental understanding of how cellular therapies provide benefit, new potency assays
284 should be developed to parallel our understanding of cell-mediated benefits. For example, given
285 increasing studies showing how many cell therapies target immune responses after stroke,
286 immunomodulation may be an important potency assay for some cell therapies.⁵⁷

287

288 **Part III: Concepts for accelerating and improving preclinical research**

289 *Rethinking content and sequence of preclinical and clinical trials*

290 State of the art preclinical research on cell therapy safety and efficacy takes significant
291 time and resources. The broad and increasing spectrum of potential confounders is expected to
292 engender additional budgetary and temporal demands that may severely hamper clinical
293 translation. STEPS 4 discussed options to accelerate preclinical research while giving
294 consideration to the complexity of potential confounding factors. A promising concept is to
295 more clearly discriminate exploratory and confirmatory preclinical research⁵⁸, and to rigorously
296 distinguish the primary goals of phase I/II clinical trials (safety) from later phases (efficacy).
297 This allows a well-orchestrated sequence of preclinical and clinical tests with partially parallel
298 workflows (Fig. 2).

299 Once a cell therapeutic paradigm is identified in initial exploratory studies, research
300 activities are divided into two parallel tracks. First, exploratory research in standard rodent

301 stroke models confirms basic efficacy. Second, confirmative research investigates safety. This
302 should also consider the most important comorbidities in the expected patient population, risks
303 exhibited by the approach and the intended route of administration.⁵⁹ Thorough confirmation
304 of safety and basic efficacy then allows proceeding to a phase I/IIa clinical trial which should
305 not have a major focus on efficacy endpoints, but would be powered to confirm safety.
306 Moreover, it should identify predominant profile characteristics of the targeted patient
307 population such as type and frequency of comorbidities, infarct location and size, and co-
308 medications.

309 This information is used to design advanced preclinical efficacy tests tailored to the
310 target patient population profile. Ideally, these efficacy studies would be conducted in parallel
311 to the phase I/IIa study. They may also be designed to identify subgroups with a pronounced
312 benefit from the particular cell therapy which can be considered in a subsequent phase IIb/III
313 clinical trial.

314 This approach has three major advantages: First, basic and enhanced preclinical efficacy
315 studies can be organized in parallel to preclinical or clinical safety tests, saving valuable time.
316 Second, the sequence of investigations in animal models and patients yields important data that
317 will help to identify the most suitable patient populations for efficacy-driven clinical trials.
318 Third, more thorough preclinical efficacy data can be used to design GMP potency assays with
319 a higher predictive value than commonly applied ones.

320

321 *Cell therapy responders versus non-responders*

322 The STEPS 4 working group recommends storage of tissues and samples from animals
323 that both respond and do not respond to cell therapy. As we learn more about the mechanisms
324 of action through which cell therapies provide benefit, we may be able to retrieve stored samples
325 from previous experiments to compare if preclinical responders and non-responders differ
326 regarding newly identified or proposed biomarkers or pathways. This enables to refine our

327 clinical understanding of “responders” or “non-responders” and to better identify patients who
328 can optimally benefit.

329

330 *Preclinical data sharing platforms*

331 A complementary opportunity to handle the increasing complexity of preclinical data
332 are (open) sharing platforms. STEPS 4 participants unanimously agreed that such platforms,
333 also including information from cell therapy cases in patients, are beneficial. Data would be
334 available for benchmarking against other research programs, enhance study power, and
335 facilitate meta-analyses. A central registry and predefinition of common preclinical data
336 elements are required, but can be informed by existing clinical registries. The Collaborative
337 Approach to Meta-Analysis and Review of Animal Data from Experimental Studies
338 (CAMRADES) database is an excellent role model, although a cell therapy registry for stroke
339 must reflect the specific requirements of the community in detail.

340 Original data may be sensitive when related to pending intellectual property or
341 commercial interests. Industry leaders among the STEPS 4 group stressed that such data should
342 enjoy special protection, but is not necessarily excluded from sharing. For instance, the identity
343 of a sensitive cell product could be concealed, but cell-treated subjects as well as all insensitive
344 information on the cell product can be disclosed. Contributors using highly sensitive cell
345 products may at least provide control cases.

346 Options to motivate contribution to data sharing platforms may be to allow access only
347 to those who contribute and/or a general requirement that publically funded cell therapy
348 research for stroke shall be publically. The STEPS 4 consortium suggests that decision makers
349 at the NIH or the European Commission should consider funding schemes that help realizing
350 data platforms tailored to cell therapies. Ideally, open data registries are organized
351 internationally and provide connection hubs for industry and clinical cell therapy data.

352

353 *Novel collaboration formats and the role of industry*

354 The increasing complexity of preclinical stroke research and the parallel need for
355 acceleration without sacrificing specificity and accuracy may not only require novel research
356 strategies but also novel research alliances. Providing methodological knowhow, flexibility,
357 and sufficient funds is required to meet the increasing need for rigor in preclinical research,
358 raising the need for academic-industry alliances. Such alliances should not be restricted to
359 sponsored contract research but true collaboration.⁵⁶ Academic-industry collaborations are also
360 pivotal to sustainably utilize MCPTs. Finally, the experience of industry in meeting regulatory
361 demands, technical aspects of cell therapies, and related logistics as well as clinical trial design
362 is invaluable to inform preclinical research in order to advance the field. The STEPS 4 group
363 recommends long-term academic-industry partnerships to thoroughly develop cell therapeutics
364 from bench to bedside through closer collaborations.

365

366 **Recommendation summary**

367 1. A stronger focus on safety rather than confirming efficacy in early preclinical
368 research, followed by early, safety-oriented clinical research has the potential to accelerate
369 translational research without sacrificing quality.

370 2. We recommend thorough and advanced safety assessments and sufficient (standard
371 stroke model) efficacy testing to support phase I/II safety trials. Advanced preclinical efficacy
372 testing should be tailored to match targeted patient populations. This approach addresses the
373 increasing complexity of potential confounding factors in a reasonable time. Appropriate
374 primary readout parameters should be chosen for subsequent phase IIb/III trials.

375 3. Specific stroke models should best mimic the targeted patient population. LAMs are
376 recommended if they provide additional, crucial information for clinical translation.

377 4. High priority should be given to developing specific and validated potency assays.
378 Investigating drug-cell interactions and identifying cell therapy responders versus non-
379 responders is recommended.

380 5. Sharing preclinical and clinical data will help the community tackle more complex
381 research questions (e.g., whether comorbidities affect efficacy or safety).

382 6. Confirmative MCPTs are a valuable confirmative research format, but larger research
383 consortia including industry joint ventures are required for successful implementation. MCPTs
384 are preferred prior to definitive efficacy trials

385
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393
394 **Disclosures**

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417

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603 **Figure Legends**

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605 **Figure 1. Functional improvement by neurorehabilitation and recommended readout**
606 **parameters.**

607 (A) Schematic time course of spontaneous functional recuperation (light grey line),
608 functional improvement with cell therapy alone (grey line), and with additional, appropriately
609 timed supportive rehabilitation (black line). The relatively small differences between the
610 therapy groups may require large sample sizes. (B) Behavioral tests differ with respect to
611 sensitivity and specificity. Simple tests detect relatively large deficits in the acute and subacute
612 stage. More sensitive tests address particular sensory and motor functions. Elaborated, often
613 highly automated tests reveal very fine motor and sensory differences, or mental/cognitive
614 impairment following stroke.

615

616 **Figure 2. Proposed concept for accelerated clinical translation.**

617 The basic suggestion of the concept is to initially focus on thorough and advanced safety
618 assessments. Exploratory (basic) efficacy results warrant entering an early stage, safety-
619 oriented clinical trial (phase I/IIa). This trial should also retrieve important characteristics of
620 the target patient population, directly informing the design of more advanced, confirmative
621 preclinical efficacy study (optionally followed by a multicenter preclinical trial) and of tailored
622 potency assays. Those allow moving forward to clinical efficacy studies (phase IIb/III) tailored
623 to the expected patient population, but in less time as would be required by sequential research
624 programs. Regulatory authorities should be consulted regularly to ensure adequate planning of
625 each parallel step.

