

Let them in or build a wall?

Transporting inferences across borders

Presenter:

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HTA and Clinical Regulatory bodies...

One of these things is not like the other....

Clinical Regulatory Authorities

- National or Supra-National Level (European)
- Approve medicinal products for sale, monitor their (safe) use, and take measures if safety issues arise
- Issue decisions based on the objective scientific criteria of quality, safety & efficacy
 - Explicitly excludes economic and other social considerations*
- Typically tested under tightly controlled conditions

HTA Bodies

- Regional, National and/or Supra-National Levels
 - Encompasses both an **assessment** (scientifically driven) and **appraisal** (w/ Ethical, Legal, Social and Economic value judgements)
 - Intended to inform decision-making, in light of public values and those of patients served by the health system
- Include a benefit assessment accompanying an economic evaluation (to determine “value for money” supporting an efficient allocation of resources)
- Major application is for recommendations about reimbursement eligibility and coverage

*Recital 13 of Regulation (EC) 726/2004



Agenda

1

Transportability

2

Hypothetical case study

3

Challenges when making
reimbursement decisions

Transportability



Transportability 101

In general, to answer a research question, the data available will represent a *sample* from a much larger *target population*

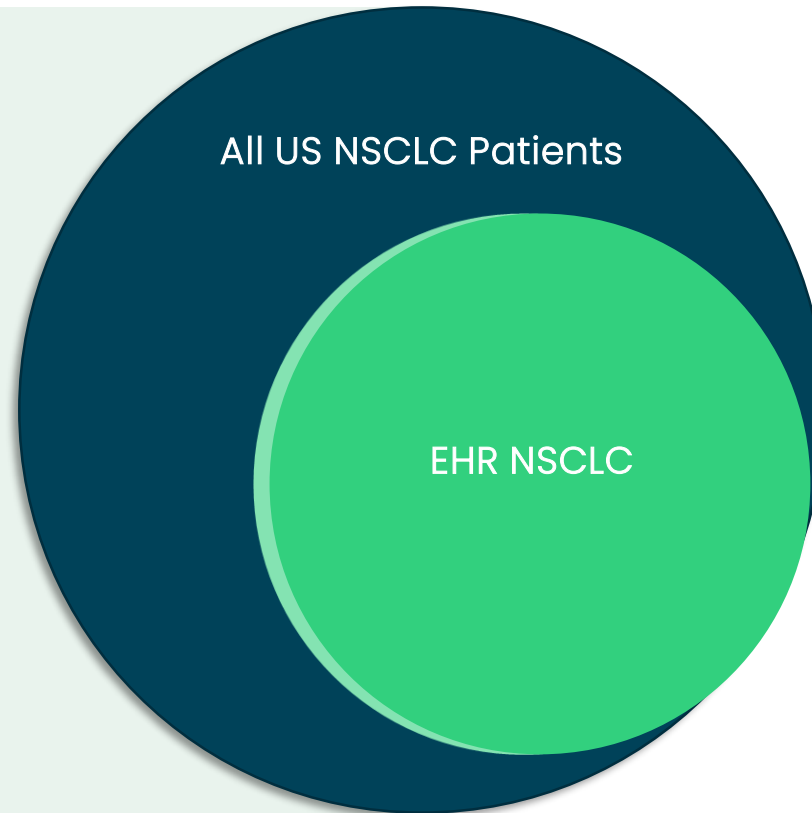


Figure 1. Illustration of NSCLC EDM as a sample of the broader US NSCLC population; Relevance of EHR RWE to the German NSCLC population requires assumption of transportability

Transportability 101

Generalizability refers to how well that *sample* will *generalize* to the *target population* from which it was sampled

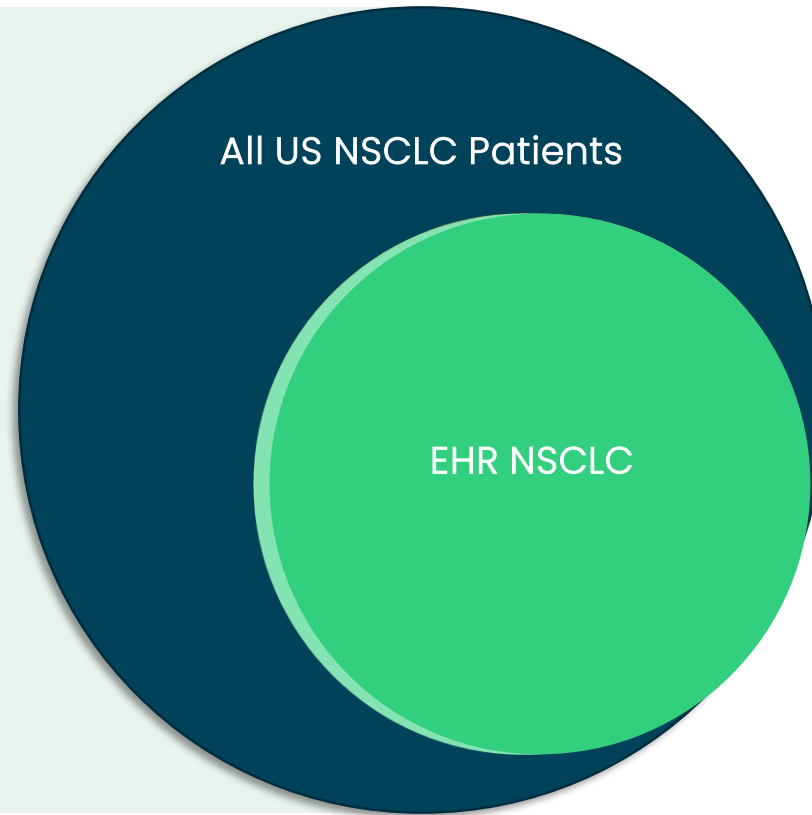


Figure 1. Illustration of NSCLC EDM as a sample of the broader US NSCLC population; Relevance of EHR RWE to the German NSCLC population requires assumption of transportability

Transportability 101

Transportability refers to how well that *sample* will *transport* to a *target population* from which the sample was not taken

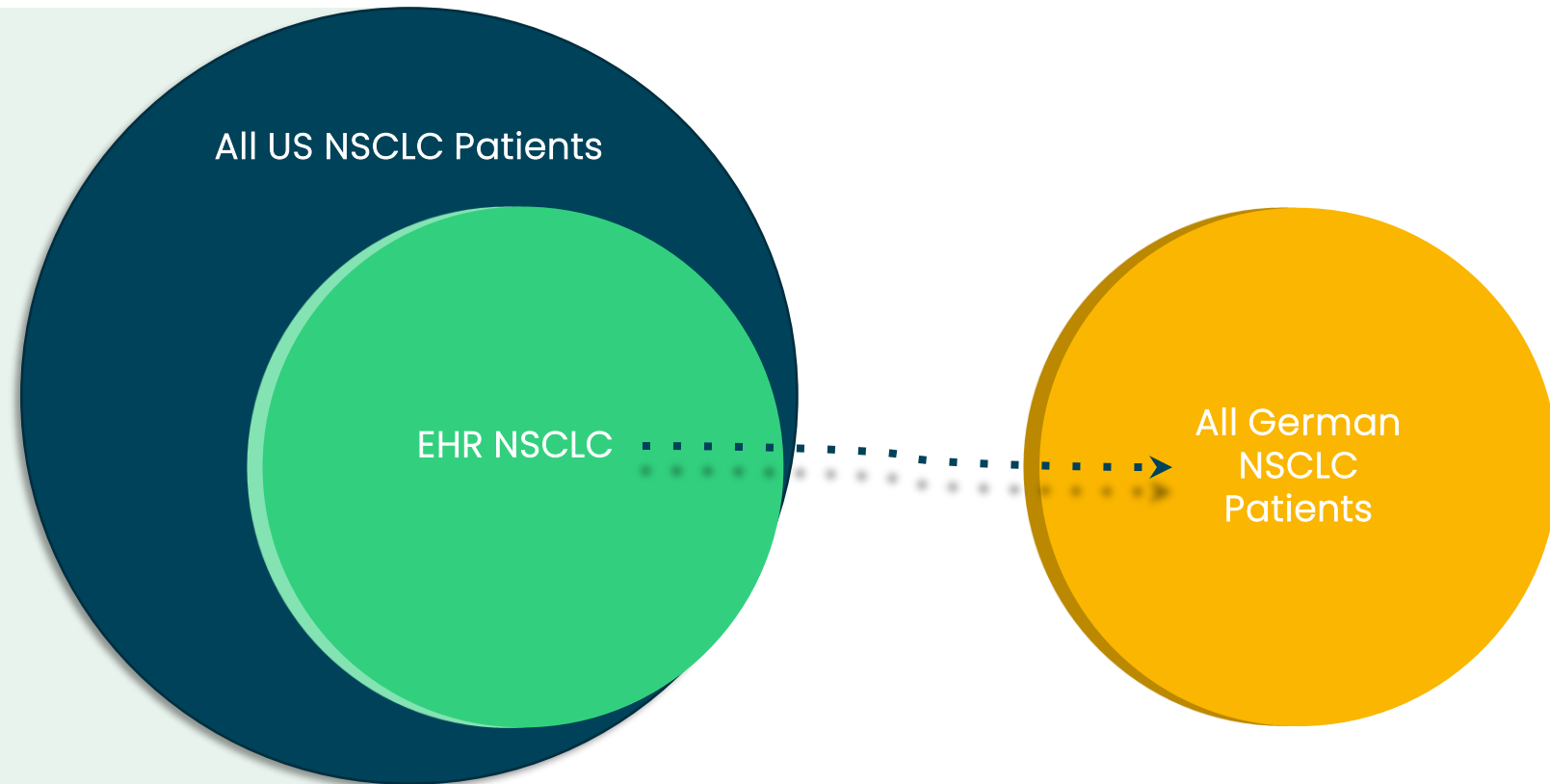
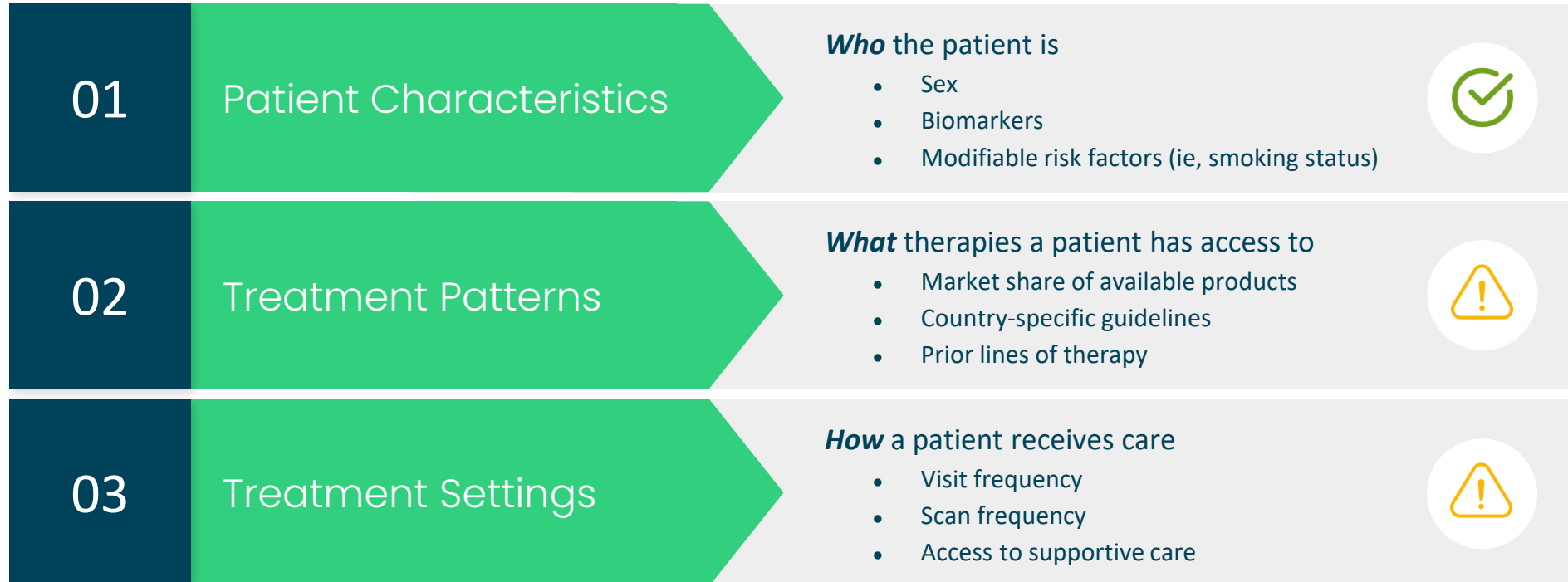


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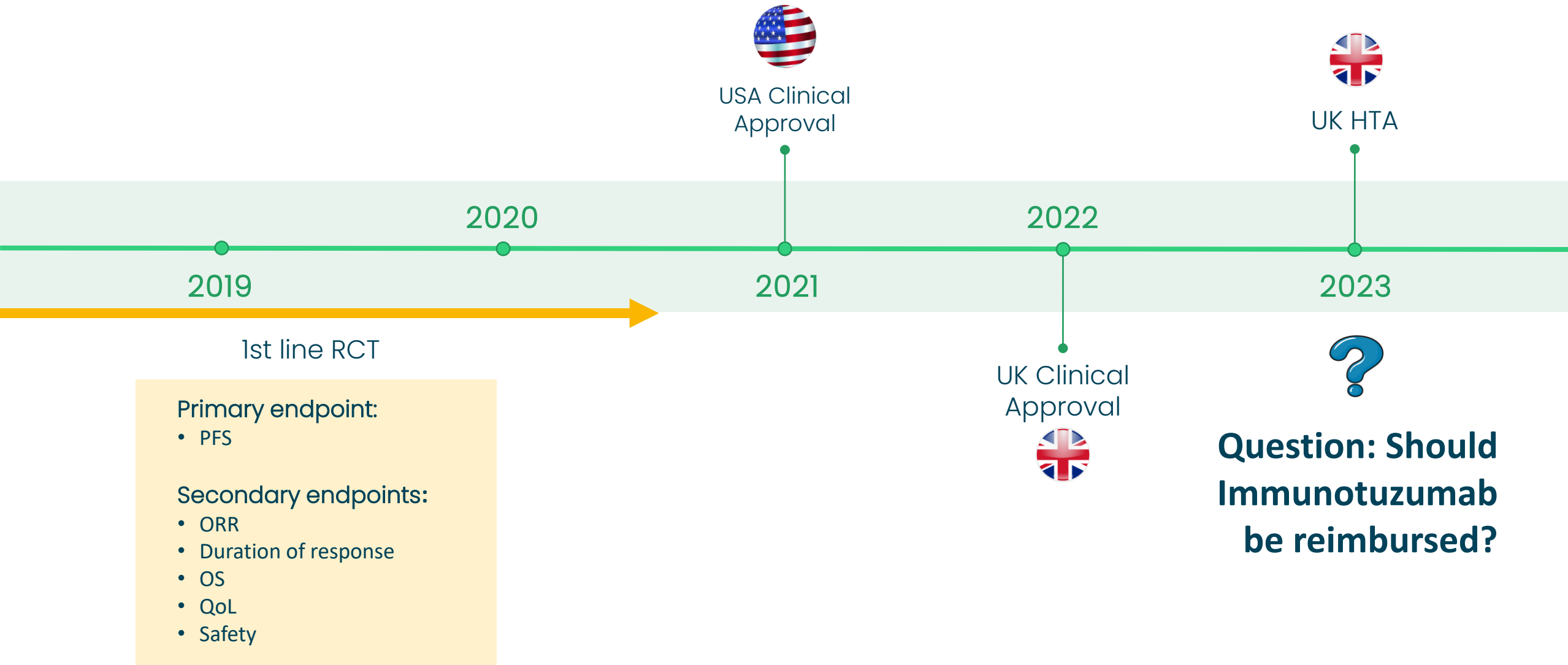
The Elements/Taxonomy of Transportability



Hypothetical case study



Commercial development timelines for Immunotuzumab

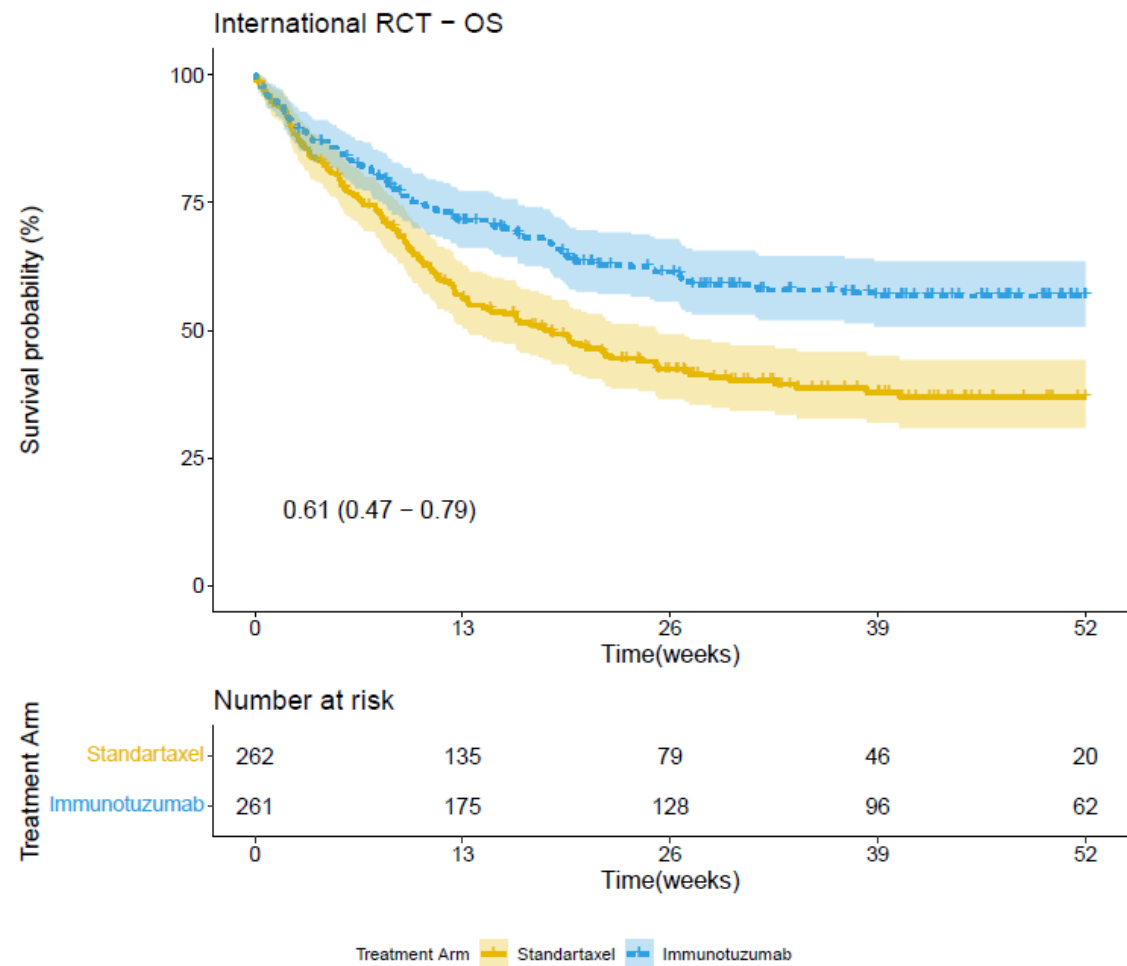


Committee meeting 1



An international RCT comparing immunotuzumab to the relevant standard of care for the UK; standartaxel

Figure 1. Kaplan–Meier Estimates of Overall Survival in the RCT Treatment Groups

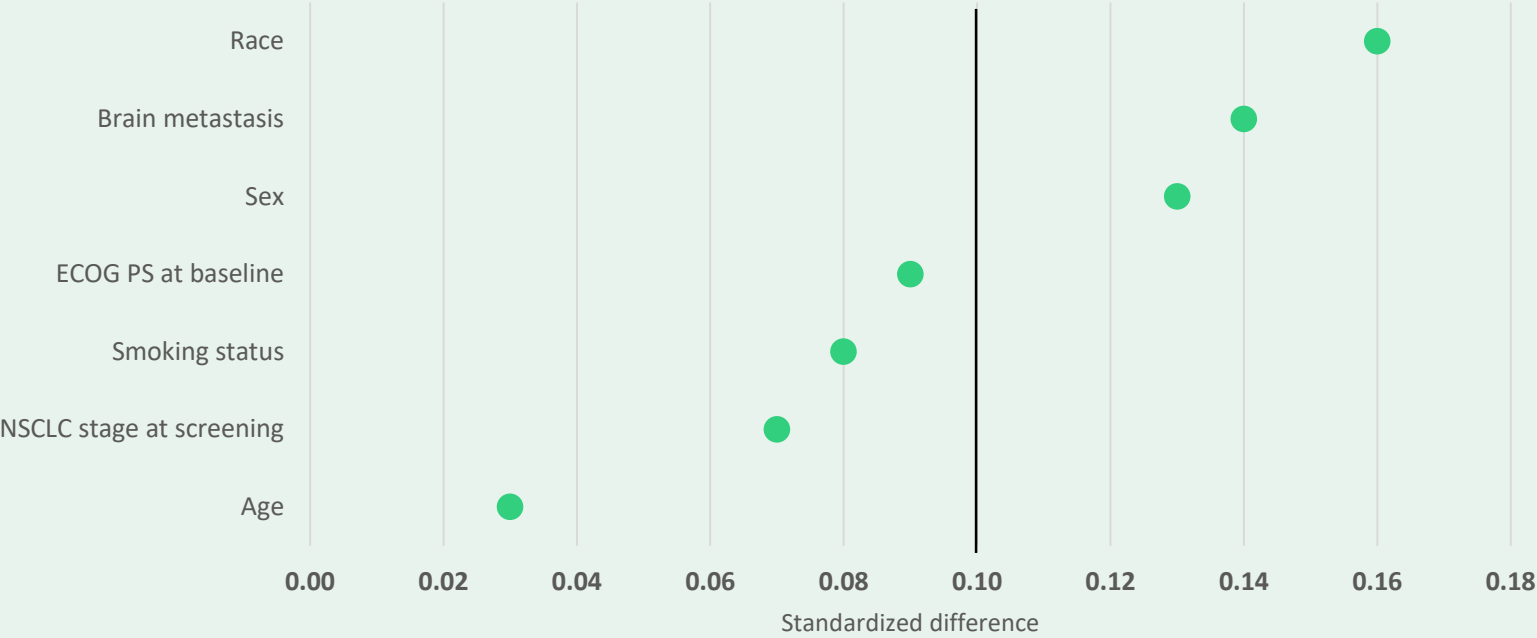


However, the RCT is **relatively small** and has relatively **immature outcome data**

The RCT also only includes a **small sample of UK patients**; not enough to support a robust subgroup analysis in the UK sub-population

RWD are available on the characteristics of the patients receiving standard of care in the UK

Figure 2. Standardized difference of baseline characteristics of RCT & UK RWD patients



The RWD source **does not capture relevant outcome data**

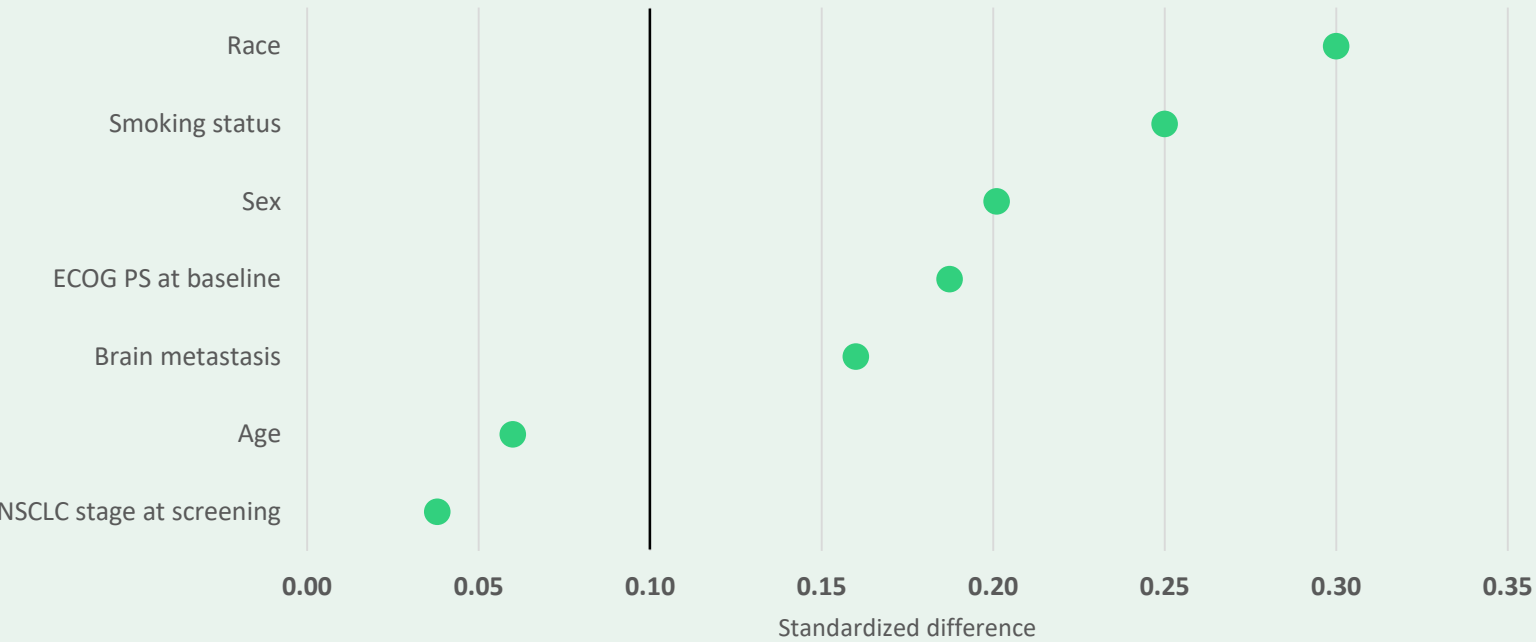
The RWD has been used to make a **crude argument** in the submission that the RCT population is relatively representative of the UK population across measured characteristics

Abbreviations: ECOG PS, Eastern Cooperative Oncology Group Performance Status; NSCLC, non-small cell lung cancer; RCT, randomised controlled trial; RWD, real world data

COMMITTEE MEETING 1: POSSIBLE SUPPLEMENTARY CLINICAL EVIDENCE

As immunotuzumab has been available in the USA for some time, relatively mature RWD on both the standard of care and immunotuzmab is available

Figure 3. Standardized difference of baseline characteristics of UK RWD & USA RWD patients



The USA has a **relatively similar population** to the UK with a different ethnic distribution

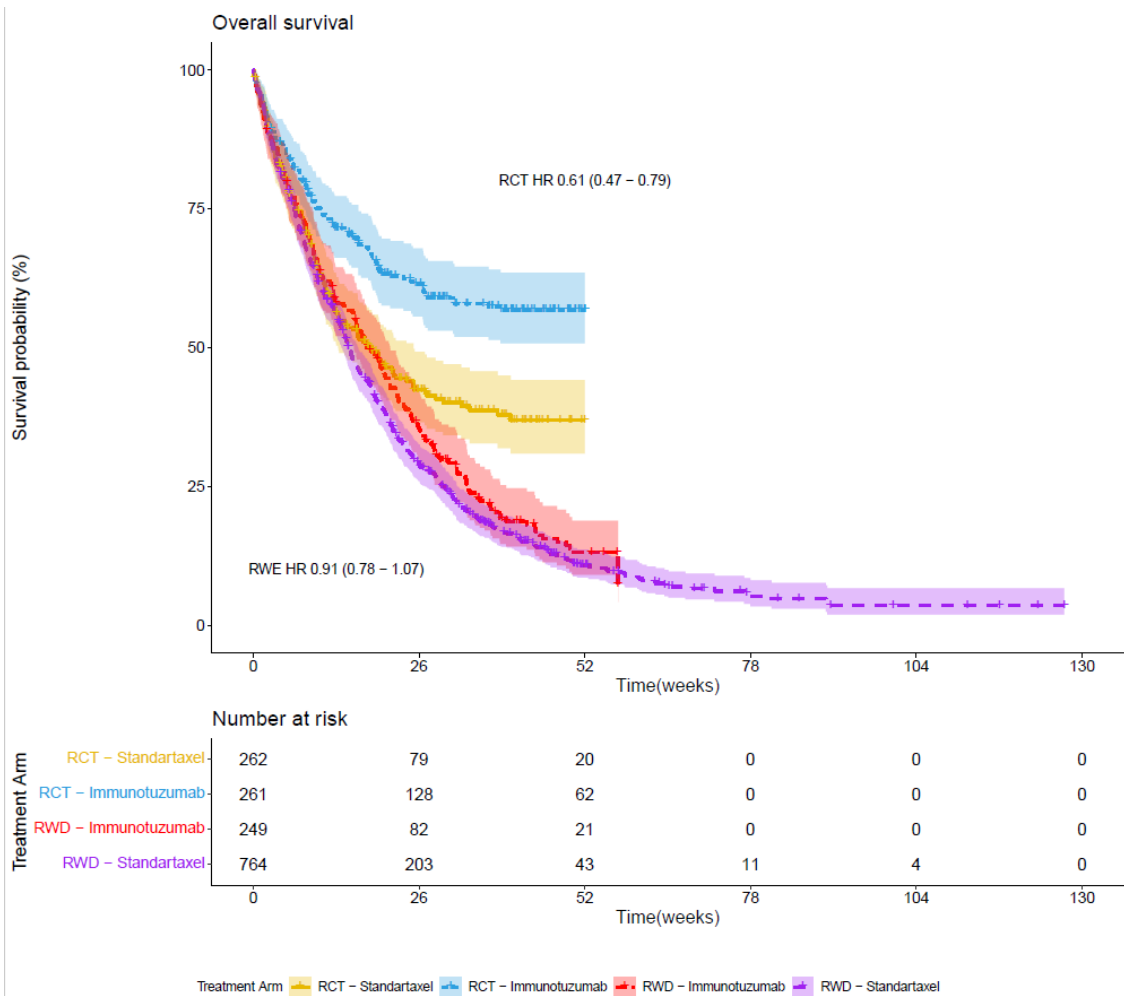
The **health systems differ considerably** with UK having a single payer system and USA having a fee-for-service / private insurance system

Abbreviations: ECOG PS, Eastern Cooperative Oncology Group Performance Status; NSCLC, non-small cell lung cancer; RCT, randomised controlled trial; RWD, real world data

COMMITTEE MEETING 1: POSSIBLE SUPPLEMENTARY CLINICAL EVIDENCE

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Figure 4. Kaplan–Meier Estimates of Overall Survival in the RCT Treatment Groups & USA RWD patients



Two options are available for the assessment to determine treatment efficacy:

Using the RCT

-Or-

The RWD from the USA

Note: A high proportion of USA patients receive **Currentrexate** as a 2nd line treatment.

Currentrexate is not approved in the the UK.

Source	HR	95%CI	ICER
Intl RCT	0.61	0.47-0.79	£15,000
USA RWD	0.91*	0.78-1.07	£60,000

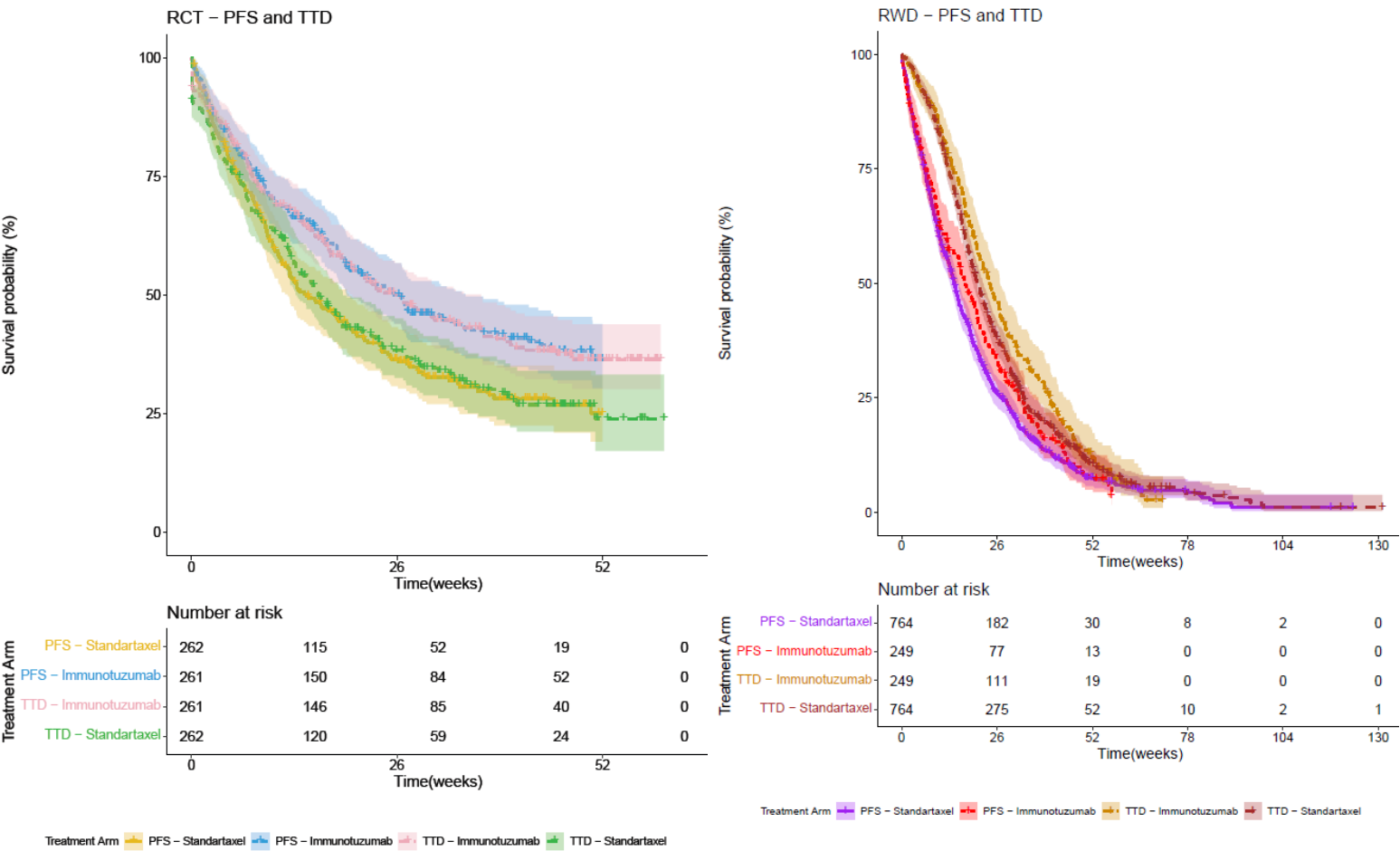
*propensity score matched analysis based on patient characteristics listed on the previous slide in order to account for the differences in characteristics in patients who get immunotuzmab and standartaxel

Abbreviations: CI, confidence interval; ERG, evidence review group; HR, hazard ratio; ICER, incremental cost-effectiveness ratio; RCT, randomised controlled trial; RWD, real world data

COMMITTEE MEETING 1: POSSIBLE SUPPLEMENTARY CLINICAL EVIDENCE

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Figure 5. Kaplan–Meier Estimates of Progression-Free Survival in the RCT Treatment Groups & USA RWD patients



Source	Treatment	Median PFS	Median TTD
Intl RCT	Standartaxel	26.3	23.7
	Immunotuzumab	23.4	21.5
USA RWD	Standartaxel	17.6	18.1
	Immunotuzumab	17.1	17.6

Abbreviations: PFS, progression-free survival; RCT, randomised controlled trial; RWD, real world data; TTD, time-to-treatment discontinuation

Committee meeting 1

Poll

Imagine you are the **company**, which additional analysis would you look to generate?

None

RWD on
duration of
treatment

Complex
analysis
weighting RCT
patients to
reflect UK
RWD
population

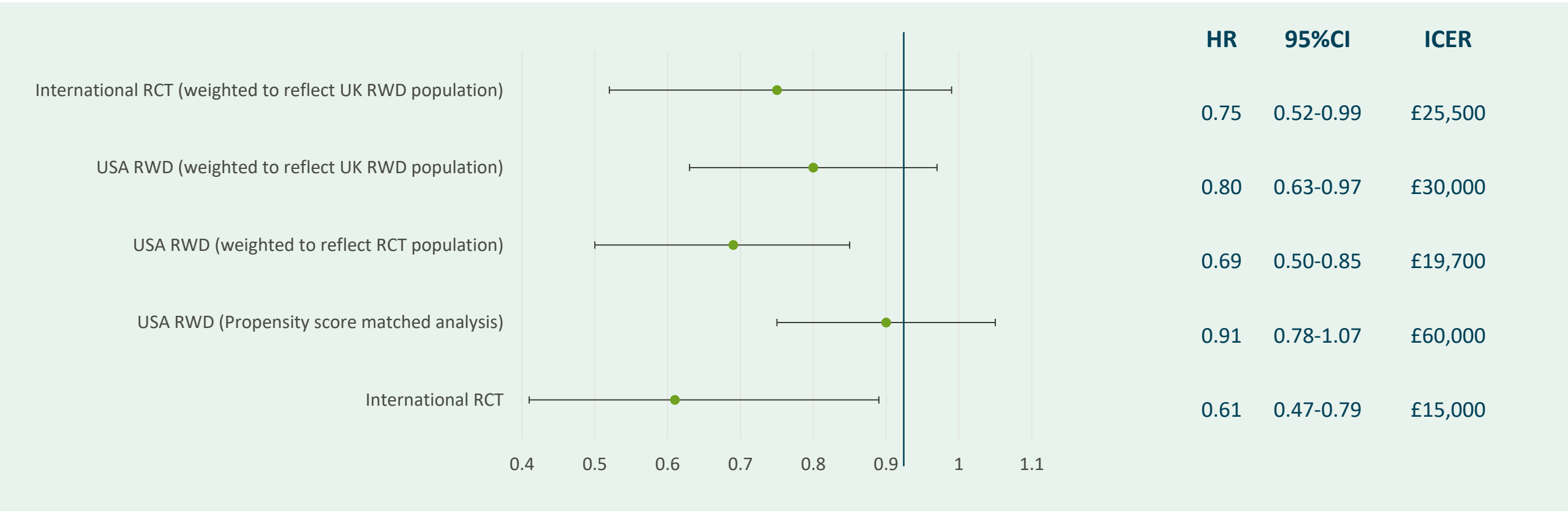
Complex
analysis
weighting
RWD patients
to the RCT

Committee meeting 2



In response to the first committee discussion several additional analyses were provided

Figure 5. Estimated treatment effect (hazard ratio (HR) for overall survival) for RCT and for additional analyses



Abbreviations: CI, confidence interval; HR, hazard ratio; ICER, incremental cost-effectiveness ratio; RCT, randomised controlled trial; RWD, real world data

Committee meeting 2

Poll

Imagine you are a **committee member** in UK, would you support reimbursement of immunotuzumab?



Yes



Yes;
managed entry
agreement



No

Summary

Evidence used to inform HTA / Access / Reimbursement decisions often rely on studies designed for other purposes (Primarily assessing safety & efficacy)

- **To what extent can we “transport” data from other sources to supplement an initial evidence package for reimbursement decisions?**
- **Important to have a clear decision problem**
 - Inferences from the RCT
 - RWD to more accurately characterize the baseline risk of “local” patients

Thank you

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The Elements/Taxonomy of Transportability

Patient characteristic differences can be adjusted for, so usually are not too much of a concern

Baseline demographics



Demographics may encompass a set of effect-modifying variables – differences in the prevalent and incident population should be considered

Prevalence of disease



The baseline prevalence of a given disease may affect the transportability of some elements based on the mathematical association with relevant endpoints

Preference for modifiable risk-factors



Preferences, and thus the prevalence, for modifiable risk factors (smoking, obesity, etc.) within a given population may modify the transportability of outcomes between countries if these risk-factors are known effect modifiers.

Biomarker prevalence



For cancers with a diverse genetic etiology, there may exist significant treatment effect heterogeneity.

Therapies indicated for those cancers may lack transportability in populations with a widely different biomarker makeup.

Further, because biomarker testing rates may differ between populations, those selected into the cohort may also differ and affect the transportability of outcomes.

The Elements/Taxonomy of Transportability

Potential for differences in how a drug is being used in the US compared to the country of interest

Access to a given treatment



A prevalent population may not be represented in the EHR data given restriction in access based on socio-economic or variability in payer preferences for a given product.

Thus, patients selecting into a given cohort could vary and impact observed outcomes.

Access to supportive care



Supportive care is known to improve outcomes for patients in many settings; however, access to supportive care varies within and between countries.

Market share of the pharmaceutical(s) of interest and competitors



Environments with a large diversity of available technologies require contextualization for who selects into a cohort treated with a specific technology.

Market share of backbone therapies used concomitantly with a therapy of interest



Even in situations where the market share for a technology of interest is the same, concomitant therapies of interest (e.g. high versus low dose dexamethasone) may differ.

If these therapies are effect-modifying, the distribution of them in the given data will affect transportability of the outcomes.

Guideline differences between jurisdictions / localities



Because the approved label /reimbursement criteria for a given therapy may vary, the way a product is used between countries may also sometimes differ, which may present itself in what is known as the compound treatment problem. Further, labels may also influence the preceding drugs that patients have been exposed to, complicating the question of transportability.

The Elements/Taxonomy of Transportability

Clinical input can identify potential differences in settings

Treatment site variation



It is thought that outcomes between academic/research institutions may be different than those observed for community practices based on available resources.

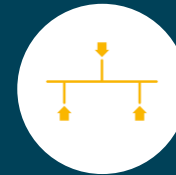
Thus, if countries differ in the distribution of these treatment sites for a given cohort of interest, outcomes would also be expected to differ.

Differences in time-to-treatment initiation within a disease's natural history



Time-to-treatment initiation may vary dramatically between countries (driven by localities procedures to confirm diagnosis and/or healthcare system capacity) and therefore change a particular risk set and influence outcomes

Disease assessment frequency



Disease assessment frequency can provide erroneous conclusions about metrics such as progression free survival or other outcomes that rely on monitoring schedules, and thus the time at which observations can be made.

Preference for end of life care



In later lines of therapy, the risk-set a country chooses to treat may be different from that of another country based on differences in preferences for hospice.

So, countries that tend to treat more aggressively may treat a sicker risk-set than that of a country that is more likely to choose for alternative end-of-life remedies