NICE National Institute for Health and Care Excellence

Axicabtagene ciloleucel for treating relapsed or refractory diffuse large B-cell non-Hodgkin lymphoma [ID1115]

Chair's presentation

2nd appraisal committee meeting

Committee C

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Company: Kite/Gilead

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Key issues

- Alternative comparator data
- Appropriate incorporation of stem cell transplants:
 - in the comparator dataset (10% or 12.5% SCT)
 - in the cost-effectiveness modelling (auto vs allo)
- Extrapolation of overall survival
 - axicabtagene ciloleucel
 - salvage chemotherapy
- Mortality risks for long term survivors
- Effect of retreatment with axi-cel on overall survival
- End of Life
- The most plausible ICER
- CDF / data collection

Axicabtagene ciloleucel (Kite/Gilead)

Marketing authorisation	Marketing authorisation granted by EMA September 2018: for 'the treatment of adult patients with relapsed or refractory diffuse large B-cell lymphoma and primary mediastinal large B-cell lymphoma after 2 or more lines of systemic therapy.'
Administration & dose	 Patient's own T cells are harvested and genetically modified ex vivo by retroviral transduction to express a chimeric antigen receptor (CAR) Each patient specific single infusion bag contains a dispersion of anti-CD19 CAR-T cells in approximately 68 mL for a target dose of 2 x 106 anti-CD19 CAR-positive viable T cells/kg body weight (range: 1 x 106 – 2 x 106 cells/kg), with a maximum of 2 x 108 anti-CD19 CAR T cells
Mechanism of action	A chimeric antigen receptor (CAR) T-cell therapy that uses autologous T-cells engineered to express a novel surface receptor directed against the tumour antigen CD19
List price & Simple discount agreement	per 68 ml single infusion bag Approved commercial arrangement (commercial in confidence)

ACD Preliminary Recommendation

Axicabtagene ciloleucel is not recommended, within its anticipated marketing authorisation, for treating relapsed or refractory diffuse large B-cell lymphoma or primary mediastinal large Bcell lymphoma in adults after 2 or more systemic therapies.

ACD: Treatment pathway and comparator treatments



ACD conclusions:

Axicabtagene ciloleucel could be used in 3 possible positions in the treatment pathway [3.3-3.6]

Axicabtagene ciloleucel would be used as an alternative to salvage chemotherapy (excluding pixantrone) [3.7]

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ACD: Comparative effectiveness results

- **ZUMA-1** (axi-cel) single-arm study of 119 adults who had ECOG performance status of 0 or 1
- SCHOLAR-1 (salvage chemotherapy) patient level historical control study from 4 sources



ACD: Comparative effectiveness results



ACD conclusion: The lack of appropriate comparator data means the size of the benefit compared with salvage chemotherapy is unknown [3.11]

Alternative comparator data is needed to better assess the clinical effectiveness of axicabtagene ciloleucel [3.13]

ACD: Base case assumptions and adjustments

	Company	ERG
Clinical	 Adjusted SCHOLAR-1, removes patients with baseline ECOG score of 2–4 	Adjusted SCHOLAR-1 data includes only patients with known ECOG score of 0-1
Extrapolation	 Mixture cure model for OS axi-cel - 50% cure fraction follow general population health from time of infusion PFS axi-cel and OS BSC: single parametric curve PFS BSC estimated using ratio of axi-cel OS-PFS 	 Hybrid model for OS axi-cel, loglogistic single parametric curve constrained by the PFS curve - 40% cure fraction BSC OS uses a single parametric curve PFS BSC estimated as in company's base case
HRQoL	 Utility values derived from ZUMA-1 trial and literature review Disutilities associated with AEs applied to axicel only General population utilities applied at 24m to patients in pre-progression state 	 Utilities and disutilities as in company's base case Those in the pre-progression state assume general population utility & costs at 52m (convergence of axi-cel OS and PFS curves)
Costs	 No costs applied after 2 years in progression- free health state Treatment costs for AEs include only IVIG and CRS treatment Undiscounted SCT long-term costs All SCT assumed allogeneic Training costs for one healthcare professional 	 CRS management occurs for 4 days Discounted SCT long-term costs BSC patients who received SCT all receive autologous SCT Scenarios for training costs of 5-10 healthcare professionals

Key: AEs, adverse events; BSC, best supportive care; CRS, cytokine release syndrome; HRQoL, health related quality of life; OS; overall survival; PFS, progression-free survival; SCT, stem cell transplant

ACD: Cost-effectiveness modelling assumptions

Issue	Committee consideration
Overall survival extrapolation for axicabtagene ciloleucel	 The company's extrapolation using a mixture cure model was likely to overestimate the size of the cure fraction, which was a major driver of the cost-effectiveness estimates ERG's hybrid approach could be a conservative extrapolation of OS The overall survival gain for axicabtagene ciloleucel was between the company's and ERG's estimates [3.17]
Retreatment with axicabtagene ciloleucel	 Retreatment with axicabtagene ciloleucel adds uncertainty to the long-term survival estimates [3.18]
Mortality risk for long- term survivors	• The assumption of no excess mortality risk for long term survivors was not appropriate [3.19]
Overall survival extrapolation for salvage chemotherapy	• The data for salvage chemotherapy came from SCHOLAR-1 which was not representative of the population eligible for axicabtagene ciloleucel. The progression-free and overall survival benefits for best supportive care were therefore unknown [3.20]
Costs of AEs and resource use	 The ERGs approach to calculating costs of administration for salvage chemotherapy, AEs and SCTs was preferred but SCTs should be allogeneic [3.21]

ACD: Cost effectiveness results

	Total Costs (£)	Total QALYs	Incremental Costs (£)	Incremental QALYs	ICER (£/QALY)	ICER range
Company's base case						
BSC			-	-	-	
Axi-cel						> £50,000
ERG's base case (mITT population)						
BSC						
Axi-cel						> £100,000

ACD conclusion:

There was a wide range between the company's and ERG's base-case ICERs and both had high degree of uncertainty because of:

- limitations in the data for the comparator
- immature survival data for axicabtagene ciloleucel

Concluded no 'most plausible' ICER for axicabtagene ciloleucel

Estimate likely to be higher than £50,000/QALY gained [3.23]

ACD: Other considerations

Issue	Committee consideration
Adverse events	 Axicabtagene ciloleucel is associated with a high rate of events The need for intravenous immunoglobulins treatment after axicabtagene ciloleucel is unknown [3.14]
End of life	 Axicabtagene ciloleucel meets criterion for extension to life: axicabtagene ciloleucel meets criterion for extension to life - in both the company's and ERG's modelling axicabtagene ciloleucel was associated with a gain in overall survival of over 3 months The committee acknowledged that axicabtagene ciloleucel did not unequivocally meet the criterion for short life expectancy but that it was plausible that the criterion could apply - median survival in the comparator data was 6.6 months, but the company's modelling predicted a mean overall survival of more than 24 months. The committee also considered clinical expert opinion [3.26]
Innovation	• Axicabtagene ciloleucel is innovative but there are no benefits not captured in the analysis [3.24]
Equalities	• There were no equality issues relevant to the recommendations [3.27]
Discount rate	• A discount rate of 3.5% should be used for both costs and benefits [3.25]

ACD: Consultation responses

- Consultee comments from:
 - Kite/Gilead (company)
 - Bloodwise
 - Lymphoma Action
- Other:
 - NHS England
- No comment response from:
 - Department of Health and Social Care
- No web comments submitted

Unmet need for new treatments *Consultee comments*

- There is urgent need for new treatment options. Patients who would be eligible for axicabtagene ciloleucel currently have no curative treatment options (all)
- The lack of treatment options puts strain on patients and carers (Bloodwise)
- Axicabtagene ciloleucel is innovative and represents a step-change in the management of people with relapsed or refractory disease (NHSE)
 - "the transformative impact of CAR-T... should therefore be given further consideration by the committee" (Bloodwise)

Comparator data

Consultee comments

- Policy query on chemotherapy as a comparator (Lymphoma Action)
- The lack of direct comparative data with salvage chemotherapy poses challenges for the committee to establish the true cost-effectiveness of axicabtagene ciloleucel
 - "However, it is clear [axicabtagene ciloleucel] is significantly more clinically effective than chemotherapy and we hope that the manufacturer will be able to provide further evidence to demonstrate this" (Bloodwise)

Company's comments:

- We do not agree that the lack of comparator data means the size of the benefit compared with salvage chemotherapy is unknown
- The SCHOLAR-1 dataset provides a robust and relevant historic comparison
- To address committee's comments adjustments to the SCHOLAR-1 dataset and two additional data sources are presented (Kite/Gilead)

Cancer Drugs Fund

Consultee comments

- Given the challenge of establishing the degree of clinical effectiveness, a recommendation in the Cancer Drugs Fund (CDF) would be a more appropriate decision for axicabtagene ciloleucel (Bloodwise)
- "While promising patients great clinical benefits, axicabtagene ciloleucel is an ideal candidate for the Cancer Drugs Funds (CDF) due to the uncertainty around longer term clinical outcomes" (NHSE)
- A recommendation for the Cancer Drugs Fund would offer more time for clinical trial data to mature during a CDF managed access period and real world data could be collected as an additional source of data (NHS England)

Company's comments:

• Kite/Gilead have made a formal application to the Cancer Drugs Fund

Company's comments: other

- Does not agree with the committee's view that the need for intravenous immunoglobulins treatment after axi-cel is unknown
 - intravenous immunoglobulins (IVIG) were rarely used in ZUMA-1 (8.3%)
 - are not expected to be required over a prolonged period of time
- Believes its approach to the extrapolating overall survival for patients receiving axi-cel is the most plausible and will be supported by the extended follow-up data from ZUMA-1. Believes the approach used by the ERG was not appropriate
- Agrees axi-cel meets NICE's criteria to be considered a lifeextending treatment at the **end of life**, and provides further supporting data from additional sources

Company's new evidence

- In response to the ACD, company have:
 - Revised the SCHOLAR-1 dataset for comparative effectiveness results
 - Provided alterative data sources to validate the best supportive care (salvage chemotherapy) overall survival
 - Oxford audit dataset
 - Subset of CORAL (preferred in the on-going appraisal of Tisagenlecleucel-T for DLBCL [ID1166])
 - Updated the base case to include the committees preferred assumptions around costs of administration for salvage chemotherapy, ICU costs and stem cell transplants costs

Provided

Cancer Drugs Fund proposal

Committee preferences and company's revised analyses

Cor	nmittee preference:	Did company include?
1	Adjusted original comparator data (SCHOLAR-1) for proportion of patients receiving stem cell transplants to more closely match the eligible population in the UK	\checkmark
2	 Provided alternative comparator data source I.e. ORCHARRD subgroups Haematological Malignancy Research Network 	√ (x) (x)
3	Survival curves adjusted for re-treatment with axi-cel	X
4	Assumed long term survivors have greater than general population mortality	\checkmark
5	Include costs of outpatient administration of salvage chemotherapy, discounted stem cell transplant costs and additional time spent in ICU by patients in ZUMA-1	\checkmark

Company's revised approach to SCHOLAR-1

- Primary refractory and patients with ECOG 2-4 or unknown ECOG status were excluded
- N=133 patients, 67 (50.4%) underwent Stem cell transplants (SCT)
- Plotted KM curves for patients who did and did not receive SCT
- Weighted average of overall survival (OS) obtained to represent OS for a specified proportion of patients receiving SCT

	100% SCT	10% SCT	0% SCT
6 months	70.1%	41.9%	34.8%
12 months	42.5%	25.2%	16.7%
18 months	34.6%	18.6%	15.2%
24 months	33.0%	15.5%	10.4%
60 months	30.8%	11.8%	10.4%
80 months	27.3%	11.6%	10.4%

Overall survival of BSC: SCHOLAR-1 (ECOG 0-1 only and excluding primary refractory) with 10% SCT



Overall survival at different time points for different SCHOLAR-1 scenarios suggested base case

Additional comparator data: CORAL extension study and Oxford audit

CORAL subpopulation – includes 203 patients who have received 2 or 3 prior therapies. Preferred in the ongoing appraisal [ID1166] Data based on published literature

Overall survival of SCHOLAR-1 vs CORAL



Oxford audit includes 41 UK patients with relapsed or refractory DLBCL, PMBCL and TFL who were ineligible for autologous SCT

Overall survival of SCHOLAR-1 vs Oxford audit dataset



Is the adjusted SCHOLAR-1 data a suitable comparator dataset?

Additional comparator data: Baseline characteristics

	ZUMA-1	SCHOLAR-1		Oxford audit		CORAL_	
Characteristic	mITT (n=108)	All patients (n=593)	ECOG 0-1 (n=188)	All (n=41)	ECOG 0-1 (n=28)	(n=203)	
Age, n (%)							
<65 years	81 (75)	509 (86)	181 (96)			203 (100)	
≥65 years	27 (25)	84 (14)	7 (4)			0 (0)	
IPI score, n (%)							
0-1	27 (25)	69 (12)	69 (37)			35 (30)	
2	33 (31)	61 (10)	54 (29)			60 (52)*	
≥3	48 (44)	80 (13)	54 (29)				
Not assessed	N/A	383 (65)	11 (6)			[≥4] 20 (17)	
Disease stage, n (%)							
1-11	18 (17)	69 (12)	62 (33)			NR	
III-IV	90 (83)	149 (25)	119 (63)			NR	
Not assessed/other	N/A	375 (63)	7 (4)			NR	
Previous chemotherapy							
and ASCT received, n (%)							
1	2 (2)	89 (15)	44 (23)			0 (0)	
2-3	65 (60)	464 (78)	143 (76)			203 (100)	
≥4	35 (33)	37 (7)	1 (1)			0 (0)	

OS extrapolations: axicabtagene ciloleucel

Company: used a mixture cure model (MCM) with 50% cure fraction (Weibull) and a separate cure assumption at 24m which reverts long term survivors to general population mortality

In response to the ACD, stated:

Company's extrapolation of OS using MCM model



The company have proposed that axicabtagene ciloleucel would be suitable for inclusion in the CDF

The company also provide a scenario analysis to address the uncertainty of **excess mortality for long-term survivors**.

A standard mortality ratio (SMR) of 1.09 was used for alive patients after 60 months (see cost- effectiveness results)

OS extrapolations: best supportive care



- Company stated that the Gompertz curves were used because visually they appear to best fit the observed data and represent the plateau of OS data
- Gompertz is also the most conservative choice of curve selection for BSC OS as it provides the best OS extrapolation

Clinical effectiveness of axicabtagene ciloleucel using new comparator data

Comparative OS of axi-cel and BSC (SCHOLAR-1, ECOG 0-1 only and excluding primary refractory with 10% SCT)



Company results & scenario analyses including proposed Commercial Access Agreement (CDF proposal)

Company's updated base case:

- SCHOLAR-1 comparative data: ECOG 0-1 only patients and primary refractory patients removed, adjusted OS representing 10% SCT
- BSC OS uses a single parametric curve (Gompertz)
- Axi-cel OS extrapolation using mixture cure model for OS (Weibull)
- Resource used and costs as in the ERG's base case, with the exception of SCT costs all allogenic

Base case	∆ Costs	Δ QALYs	ICER	ICER range
Company's updated base case				< £50,000
Scenario analyses				
Company's updated base case + standard mortality ratio of 1.09 for patients alive after 60 months				< £50,000
Base case + resource use and costs from ERG base case, but with 50% alloSCT costs				< £50,000

Does the company's updated base case include all committee's

preferred assumptions?

ERG critique

Adjustments to – SCHOLAR-1	 The company's approach is consistent with the ERG's approach in the ID1166 appraisal which was found <i>"appropriate to model salvage chemotherapy"</i> The company used a SCT rate of 10% - a rate of 12.5% appears more consistent with the committee's preferences reported in the ACD for ID1166
Validation of OS for – BSC	 The ERG agrees with the company - survival predictions are very similar using the separate CORAL and SCHOLAR-1 cohorts Limited data is provided from the small Oxford RWE dataset which shows different baseline characteristics to SCHOLAR-1 and CORAL
Extrapolation of OS for – axi-cel	 The ERG is unable to either confirm or refute the company's findings as the data is confidential The ERG disagree that their approach should not be considered as there is no evidence to supportive a curative potential of salvage chemotherapy or data to address the potential confounding of retreatment ERG explores 3 alternative approaches to modelling OS for axi-cel
Resource use cost and IVIG – use	 Model changes are implemented correctly The clinical views around SCTs expressed in this appraisal are not consistent with data from the CORAL extension study and so uncertainty remains about the relative use of autologous versus allogeneic transplant In ID1166, the committee accepted the ERG's assumption that B-cell aplasia may persist for up to 3 years (compared to the company's assumption of 1 year)

Axicabtagene ciloleucel OS extrapolation: ERG's alternative modelling approaches



ERG – alternative base case 'hybrid' approach



Alternative analysis



ERG:

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- Overall survival data for axi-cel is immature
- No evidence to supportive a curative potential of salvage chemotherapy provided
- No evidence on re-treatment with axi-cel provided
- No single approach to modelling is 'optimal'
- All should be considered in CE modelling

ERG base case analyses

- The ERG applied a SCT rate of 12% to the company's base case and compared 3 exploratory approaches for modelling axi-cel:
 - The company's revised base-case approach using partitioned survival modelling
 - Alternative analysis
 - The ERG's alternative 'hybrid' modelling approach

	Δ Costs	Δ QALYs	ICER	ICER range
Company's updated base case				< £50,000
ERG's exploratory analyses with 12.5% SCT	for BSC			
Company's updated base case (partitioned survival model) axi-cel				< £50,000
Alternative analysis for axi-cel				> £50,000
ERG's hybrid modelling approach for axi-cel				> £50,000

What is the most plausible/appropriate extrapolation of axi-cel overall survival?

Cost-effectiveness results: ERG's exploratory analyses

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Scenario analyses	Effect on incremental costs/QALYs	Company's base case	Alternative analysis	ERG's hybrid model
Company base case	-	<£50,000		>£50,000
Auto (87%) vs Allo (13%) SCT	Increasing ASCT reduces the costs in the BSC arm, increasing incremental costs and ICER	<£50,000		>£50,000
IVIG use for 3 years instead of 1 year	Increasing time on IVIG increases the costs in the axi-cel arm, increasing incremental costs	<£50,000		>£50,000
Company's cure assumption applied at 5 years not 2 years	Increasing the time spent in the pre- progression state before being considered cured reduces the incremental QALY gains and increases the ICER	<£50,000		>£50,000
ITT analysis	Incorporating QALYs from patients who did not receive axi-cel reduces QALY gains in the axi-cel arm and increases the ICER	<£50,000		>£50,000
Above combined	Combining all of the ERG's preferred assumptions reduces incremental costs but also reduces the incremental QALY gains increasing the ICER	>£50,000		>£50,000

End of life considerations

	tagene ciloleucel meets criterion
 In ACM1 committee considered that axicable for extension to life but there is uncertainty The committee acknowledged that axicabta unequivocally meet the criterion for short lite plausible that the criterion could apply The committee concluded that axicabtagene be considered a life-extending treatment at 	about short life expectancy agene ciloleucel did not ife expectancy but that it was e ciloleucel met NICE's criteria to the end of life
 Present data from the Oxford and CORAL devidence for End Of Life criteria for axi-cel Consistent with input by the clinical experts the data sources show that for the vast major the median is short and less than 6 months 80% or more have died within two years 	datasets as further supporting s at the appraisal committee all jority the outcome is dismal
 Marked difference between the median and Driven by the model predictions that a small experience long term survival with current t Undiscounted life year estimates for BSC application The ICER is also sensitive to the survival function 	d mean OS estimates for BSC II proportion of patients will treatment options ppear extremely sensitive to the nction for BSC

End of Life: company's supporting evidence

	SCHOLAR- 1: 0% SCT	SCHOLAR-1: 100% SCT	CORAL: 0% SCT	CORAL: 100% SCT	Oxford audit (excl. ECOG 2-3)	Oxford audit (all ECOG)
Median OS (m)	4.0	9.7	3.3	11.1		
Survival at:						
6 months	34.8%	70.1%	29.8%	69.80%		
12 months	16.7%	42.5%	16.2%	40.90%		
18 months	15.2%	34.6%	11.1%	36.10%		
 24 months 	10.4%	33.0%	9.3%	33.50%		
40 months	10.4%	33.0%	7.1%	33.50%		
60 months	10.4%	30.8%	7.1%	33.50%		

- In each analyses a small proportion of patients have longer term survival increasing the mean vs the median
- In the CORAL cohort over 80% of patients had died before the 2 year stage, consistent with the Oxford audit dataset

ERG's exploratory analyses: OS extrapolations best supportive care



ERG's exploratory analyses: OS extrapolations for best supportive care

Given the uncertainty around the choice of distribution the ERG formally account for the uncertainty surrounding choice of survival distribution is to use a model averaging approach - choosing an alternative distribution has a large effect on the mean LE

Summary of goodness of fit statistics and AIC weights (ERG calculations)

	100% SCT		0% SCT		12.5% SCT rate
Distribution for OS (BSC)	AIC	AIC based weight	AIC	AIC based weight	Undiscounted Life Years (mean)
Exponential	416.95	0%	408.75	0%	
Weibull	402.61	0%	396.66	0%	
Gompertz	378.04	32.49%	364.03	14.65%	
Loglogistic	389.03	0.13%	364.47	11.75%	
Lognormal	387.40	0.3%	370.14	0.69%	
Generalised gamma	376.59	67.08%	360.82	72.91%	

What is the most appropriate distribution for extrapolation of BSC?

Cost-effectiveness results: ERG's exploratory analyses

		Modelling approach					
Distribution	Effect on incremental costs/QALYs	Company's base case	Alternative analysis	ERG's hybrid model			
Base case (1)	2.5% SCT)						
Gompertz	-	<£50,000		>£50,000			
Gamma	Reduced survival in BSC arm increases incremental costs and incremental QALY gains	<£50,000		<£50,000			
Loglogistic	Lowest survival in BSC arm, increased incremental costs and incremental QALY gains	<£50,000		<£50,000			
ERG's combined scenario (87% Autologous SCT, Cure at 5yrs, IVIG for 3yrs and ITT population)							
Gompertz	_	>£50,000		>£50,000			
Gamma	Reduced survival in BSC arm increases incremental costs and incremental QALY gains	<£50,000		>£50,000			
Loglogistic	Lowest survival in BSC arm, increased incremental costs and incremental QALY gains	<£50,000		<£50,000			

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Cancer Drugs Fund

Starting point: drug not recommended for routine use

1. Why is drug not recommended? Is it due to clinical uncertainty?

2. Does drug have plausible potential to be cost-effective at the current price, taking into account end of life criteria?

3. Could data collection reduce uncertainty

4. Will ongoing studies provide useful data?



Recommend enter CDF

Indicate research question, required analyses and number of patients in NHS in England needed to collect data The company have proposed that axicabtagene ciloleucel would be suitable for inclusion in the CDF as:

- Overall survival data from ZUMA-1 is immature (median 15 months follow-up)
- Clinical uncertainty could be reduced with results from the ongoing ZUMA-1 trial (2 year data cut)