ID1349 CDF review of TA447

LIVERPOOL REVIEWS AND IMPLEMENTATION GROUP (LRiG)

Pembrolizumab for untreated PD-L1 positive metastatic non-small cell lung cancer (CDF review of TA447) ID1349

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CONTAINS ACADEMIC IN CONFIDENCE DATA

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A MEMBER OF THE RUSSELL GROUP

The company identified 11 overall issues in relation to factual inaccuracies in the original Evidence Review Group (ERG) report. Not all were considered by the ERG to be factual inaccuracies but some were considered to require minor changes to the text. The pages of the ERG report that have been affected are included in this document. Please note that:

- New text added by the ERG is in ***red italics and underlined***.
- Text deleted completely is struck out.
- Unaltered text, which is considered to be of relevant context to that added, amended or deleted (such as headings or sentences preceding or following the added, amended or deleted text), is presented in its original font.
- All other unaltered text is greyed out.

Table 1 Results from the KEYNOTE-024 trial (ITT population)

Endpoint	IA2		Final	
	Pembrolizumab N=154	SOC N=151	Pembrolizumab N=154	SOC N=151
Primary endpoint				
PFS (BICR)				
Median, months (95% CI)	10.3 (6.7 to -)	6.0 (4.2 to 6.2)	[redacted]	[redacted]
HR (95% CI)	0.50 (0.37 to 0.68) p<0.001		[redacted]	
Number of events, n (%)	73 (47.4)	116 (76.8)		
Person months	1000.2	785.6		
Event rate/100 person months	7.3	14.8		
PFS rate at 6 months	62.1%	50.3%		
PFS rate at 12 months (95% CI)	47.7%	15.0%	[redacted]	[redacted]
PFS rate at 18 months (95% CI)	NR	NR	[redacted]	[redacted]
PFS rate at 24 months	NR	NR	[redacted]	[redacted]
Secondary endpoints				
OS				
Median, (months) (95% CI)	Not reached	Not reached	30.0 ([redacted]	14.2 ([redacted]
HR (95% CI)	HR 0.60 (0.41 to 0.89) p=0.005		0.63 (0.47 to 0.86) p=0.002	
Number of events, n (%)	44 (28.6)	64 (42.4)	73 ([redacted]	96 [redacted]
Person months	1402	1227.5	[redacted]	[redacted]
Event rate/100 person months	3.1	5.2	[redacted]	[redacted]
OS rate at 6 months	80.2%	72.4%		
OS rate at 12 months (95% CI)	69.9%	54.2%	[redacted]	[redacted]
OS rate at 18 months (95% CI)			[redacted]	[redacted]
OS rate at 24 months (95% CI)			[redacted]	[redacted]
OS rate at 30 months (95% CI)			[redacted]	[redacted]
ORR (BICR)				
Confirmed ORR (95% CI)	44.8% (36.8%to 53%)	27.8% (20.8% to 35.7%)	45.5% (37.4% to 53.7%)	29.8% (22.6 to 37.8)
Difference: pembrolizumab vs SOC (95% CI)	16.6% (6.0% to 27.0%) p=0.0011		14.9% (4.3% to 25.4%) p=0.0031	

BICR=blinded independent central review; CI=confidence interval; HR=hazard ratio; ITT=intention to treat; IA2=second interim analysis; ORR=objective response rate; OS=overall survival; PFS=progression-free survival; SOC=standard of care
Source: CS1, Table 17, Table 18, Table 25 and CS2, Table 6, Table 7 and Table 8

The PFS results from the final analyses were similar to the results from the IA2 analyses. Using the final data-cut, median PFS was longer for patients in the pembrolizumab arm compared to patients in the SOC arm, [redacted] months versus [redacted] months. In the original ERG report, the ERG noted that there appeared to be a difference of 3.1 months in median PFS between the investigator-assessed results and the results reported for BICR-assessed PFS (7.2 months and 10.3 months respectively). Median PFS in the SOC arm appeared to be similar between the two analyses (5.5 months and 6 months). The ERG is uncertain of the reasons for, or the implications of, the 3.1 months difference between the BICR-assessed PFS and investigator-assessed PFS. ~~No updated investigator assessed PFS data were submitted by the company in CS2.~~

Using the IA2 data-cut, median OS was not reached. Using the final data-cut, median OS was longer for patients in the pembrolizumab arm compared to patients in the SOC arm, 30 months versus 14.2 months.

The objective response rate (ORR) results from the final data-cut were similar to the results from the IA2 analyses. Using the final data-cut, the ORR was higher for patients in the pembrolizumab arm compared to patients in the SOC arm (45.5% versus 29.8%), with a confirmed difference in ORR of 14.9% (95% CI 4.3% to 25.4%, p=0.0031).

The results of the exploratory outcomes from the KEYNOTE-024 trial are presented in Table 3 and show that 70 patients in the pembrolizumab arm responded to treatment (median time to response 2.1 months; range, 1.4 to 14.5) and that the median duration of response was not reached in the pembrolizumab arm. In the SOC arm, 45 patients responded to treatment (median time to response 2.2 months; range, 1.8 to 10.3) and the median duration of response was 7.1 months. It is unclear why the upper bound of the time to response range for patients in the SOC arm is lower when calculated using the final dataset than it was when calculated using IA2 data (12.2 months [IA2] versus 10.3 months [final]).

Table 2 Summary final OS results adjusted for direct and indirect switching

ITT	0.63	0.47 to 0.86	0.003	0.63	0.47 to 0.86	0.003
RPSFT	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Simplified two-stage (no re-censoring)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Two-stage (with re-censoring)	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
IPCW	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

CI=confidence interval; HR=hazard ratio; IPCW=inverse probability of censoring weighted; ITT=intention to treat; RPSFT=rank preserving structural failure time; SOC=standard of care
* p-value retained from the ITT analysis based on distribution of the test statistic under the null hypothesis of no treatment effect
** This is a bootstrap p-value (not 2-sided)
Source: CS2, Table 9 and Table 10

1.1 Indirect and mixed treatment comparisons

The company offered to update the indirect and mixed treatment comparisons (ITCs and MTCs) that were presented in CS1. However, as new evidence that would ameliorate the concerns expressed in the original ERG report have yet to become available, during the clarification telephone conference, the company, the NICE team and the ERG agreed that updated ITC and MTC results would not be useful to decision-makers.

1.2 Health-related quality of life from the KEYNOTE-024 trial

No new health-related quality of life data from the KEYNOTE-024 trial were submitted as part of CS2.

1.3 Adverse events from the KEYNOTE-024 trial

Clinical advice to the ERG is that AEs arising from treatment with immunotherapy (i.e., pembrolizumab) in patients with NSCLC require careful monitoring. The use of immunotherapies such as pembrolizumab has been evaluated for several years in patients with melanoma; however, in comparison to patients with melanoma, patients with NSCLC are older and have higher rates of co-morbidities. Patients may also have greater variation in available social support. Expert advice to the ERG, presented in the TA447 ERG report, is that a specialist clinical team with the experience to provide early recognition and management of immunotherapy-related AEs is needed at treatment centres in the event that pembrolizumab is approved for use in the treatment of NSCLC in the NHS. Current training of senior and junior oncology medical staff as well as specialist nursing staff may be insufficient to recognise

estimate underlines the uncertainties associated with long-term extrapolation of short term data sets and the fact that even a small amount of additional data can alter long-term survival projections.

To generate OS estimates for patients receiving SOC (immunotherapy on disease progression) the company used unadjusted data from the SOC arm of the KEYNOTE-024 trial. Two thirds of patients in this arm ([redacted]) received immunotherapy ([redacted] pembrolizumab and [redacted] other immunotherapies). In the CS2 model, it is assumed that [redacted] of patients receive pembrolizumab and the remaining [redacted] of patients receive docetaxel.

The company has estimated the cost of treatment with pembrolizumab following chemotherapy based on the average number of weeks of treatment received by patients in the SOC arm of the KEYNOTE-024 trial (29.1 weeks). The company's cost of treatment with docetaxel is estimated to be 8.5 weeks. The company state that the source for this assumed length of treatment is TA406 (Crizotinib for untreated anaplastic lymphoma kinase-positive advanced non-small-cell lung cancer);[12] however, the rationale for this choice of length of treatment is not provided. Drug and drug administration costs were included in the model as a one-off cost at the time of disease progression.

The company OS estimates (for both patients treated with pembrolizumab and those receiving SOC) were derived by appending exponential distributions to KEYNOTE-024 trial data at three different time points (23, 33 and 43 weeks). The 33-week time point was used in the company base case.

The company's base case results for the comparison of the cost effectiveness of pembrolizumab versus SOC (chemotherapy followed by immunotherapy) are shown in Table 6 (exponential distributions appended to KEYNOTE-024 trial K-M data at 33 weeks). Results generated when exponential distributions are appended to KEYNOTE-024 trial data at 23 and 43 weeks are also provided.

Table 3 Company model results (CS2)

Technologies	Total			Incremental		ICER per QALY gained
	Costs	LYG	QALYs	Costs	QALYs	
Distributions appended to K-M data at 33 weeks (company base case)						
SOC (chemotherapy followed by immunotherapy)	[redacted]	[redacted]	[redacted]	-	-	-
Pembrolizumab	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Distributions appended to K-M data at 23 weeks						
SOC (chemotherapy followed by immunotherapy)	[redacted]	[redacted]	[redacted]	-	-	-
Pembrolizumab	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Distributions appended to K-M data at 43 weeks						
SOC (chemotherapy followed by immunotherapy)	[redacted]	[redacted]	[redacted]	-	-	-
Pembrolizumab	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

ICER=incremental cost effectiveness ratio; K-M=Kaplan-Meier; LYG=life year gained; QALY=quality adjusted life year; SOC=standard of care
Source: CS2 model

1.4 ERG critique of the company economic analysis

1.4.1 Data source for standard of care (pembrolizumab following chemotherapy)

The ERG agrees with the company assessment that, in NHS clinical practice, current care for patients with advanced or metastatic PD-L1 positive (≥50%) NSCLC is chemotherapy followed, on disease progression, by immunotherapy. However, there is currently no trial data that directly compares the efficacy of pembrolizumab in patients with advanced or metastatic PD-L1 positive (≥50%) NSCLC who have, with those that have not, received prior chemotherapy. The company has suggested that as patients in the SOC arm of the KEYNOTE-024 trial were permitted to receive pembrolizumab (or another immunotherapy) following disease progression, these data can be considered to represent outcomes for patients receiving current NHS care.

Examination of the OS K-M data from the SOC arm of the KEYNOTE-024 trial (clarification question B1) reveals that OS for the 54.3% of SOC arm patients who received pembrolizumab following disease progression was much better than that of patients who did not (or had not yet received) an immunotherapy (Figure 1).

Figure 1

The K-M data from the SOC arm of the KEYNOTE-024 trial show that patients who did not receive immunotherapy on disease progression died within 6 months of enrolment into the trial compared to of SOC arm patients who received immunotherapy. receiving pembrolizumab in the SOC arm had died within the first 12 weeks of the trial compared to of SOC arm patients who did not receive immunotherapy.

All patients in the SOC arm of the KEYNOTE-024 trial were eligible for immunotherapy following confirmed disease progression. The ERG considers that the high early mortality of patients in the SOC arm who did not receive immunotherapy is evidence that these patients died before, or shortly after disease progression and, therefore, never had the opportunity to receive any subsequent therapy (immunotherapy or docetaxel). The K-M data from the SOC arm of the KEYNOTE-024 trial also show that around of patients who did not receive immunotherapy following progression were still alive . These patients were eligible under the trial protocol to receive immunotherapy on disease progression; however, the reasons why they did not do so are unknown. The ERG considers it plausible that at least some of these patients would commence immunotherapy in the future and the potential OS gain from them doing so is not captured by either the OS K-M data from the KEYNOTE-024 trial or any of the current company OS projections.

In the absence of a direct head-to-head trial data comparing the efficacy of pembrolizumab in patients with advanced or metastatic PD-L1 positive (≥50%) NSCLC who are untreated with those previously treated with chemotherapy, the SOC arm for KEYNOTE-024 is currently the best available evidence for this comparison. However, the ERG considers there is evidence

from within the KEYNOTE-024 data that using OS data from the SOC arm of that trial may underestimate the true survival of patients receiving pembrolizumab after chemotherapy.

1.4.2 Pembrolizumab treatment costs

Within the CS2 model, it is assumed that patients who receive pembrolizumab following chemotherapy are prescribed a fixed dose of 200mg every 3 weeks (Q3W). However, it is stated within the *SmPC*[8] issued by the European Medicines Agency that the recommended dose of pembrolizumab for patients with NSCLC who have previously been treated with chemotherapy is 2mg/kg bodyweight Q3W. Applying the cost for the recommended dose of pembrolizumab in the CS2 model (based upon the mean body weight of patients participating in the KEYNOTE-024 trial) reduces the company base case discounted costs for patients receiving SOC by [redacted] to [redacted] per patient, and increases the ICER for the comparison of pembrolizumab versus SOC to [redacted] per QALY gained.

Within the CS2 model, the cost of pembrolizumab, for those who have received prior chemotherapy, was determined by the mean time that patients in the SOC arm of the KEYNOTE-024 trial received pembrolizumab (29.1 weeks). This cost was applied as a one-off fee at disease progression. Given that data from the KEYNOTE-024 trial show that the mean length of time that patients randomised to receive SOC received pembrolizumab following disease progression was 6 months; and the mean time to treatment commencement following disease progression for these patients was 7 weeks, use of discounting in the model would be expected to slightly reduce the total cost of pembrolizumab treatment for these patients. The ERG, therefore, considers that the company's approach to costing treatment with pembrolizumab in patients previously receiving SOC is likely to overestimate the true discounted cost of this treatment. Generating a more accurate cost of treatment would require structural changes to the model that are beyond the remit of the ERG.

1.4.3 Limiting utility values to age-related population norms

In the TA447 ERG report, the ERG highlighted that the utility values in the company model seemed implausibly high for patients with metastatic NSCLC. The utility value in the CS1 and CS2 models for patients who were over 360 days from death was [redacted]. The age-related norm for people aged 65 (the age of the population at model time zero) is 0.79.[13] The ERG made the conservative suggestion that the values used in the company model should be no higher than the age-related population norms. This assumption was accepted by the NICE Appraisal Committee.

The company has undertaken a literature review (CS2, p86-90) and used results from this review to justify using a utility value of [redacted] at 360 days before death in the CS2 model. The

ERG considers that results from the company literature review do not strongly support the use of this value as the cited studies either involved patients at slightly different disease stages, were undertaken in countries other than the UK, or involved small numbers of patients. The ERG, therefore, considers that it is appropriate to still limit utility values in the model to be no higher than the age-related population norms.

Adjusting the company base case by model by limiting the utility value to the age-related population norms reduces the difference in QALYs for patients treated with pembrolizumab versus SOC by 0.02 QALYs and increases the ICER for this comparison to [redacted] per QALY gained.

In the TA447 ERG report, the ERG highlighted that alternative (much lower) values for utilities to those used by the company have been used in previous NICE STAs. The ERG has carried out an exploratory analysis involving using utility values reported by Nafees[14] (0.673 for >180 days from death and 0.473 for <180 days from death). The effect on the company base case of using the Nafees utility values is to reduce the difference in QALYs for patients treated with pembrolizumab versus SOC by 0.16 QALYs and increases the ICER for this comparison to [redacted] per QALY gained.

As a point of clarification, the company states in CS2 (p90) 'Additionally and importantly, the NICE reference case stipulates the use of utility values directly derived from the patients.' The ERG highlights that the actual wording of the NICE Reference Case is '…health states drawn from patients directly with societal valuation of these health states.'

1.4.4 Extrapolation of KEYNOTE-024 trial OS data

Within the CS2 model, the company has estimated OS, both for patients initially receiving pembrolizumab and those initially receiving SOC, by appending a variety of parametric distributions to KEYNOTE-024 trial OS K-M data at different time points (23, 33 and 43 weeks). In the TA447 ERG report, the ERG explained that they considered that there was little evidence to support any particular method of extrapolating available trial data. Whilst CS2 includes 6 months more K-M data than CS1, data are still only available for approximately 10% of the model time horizon. The difficulty in choosing the most appropriate curve to use to extrapolate trial data is illustrated by the range of potential distributions considered by the company (see Figure 2 and Figure 3).

Figure 2

Figure 3

Visual examination of the various distributions considered by the company to extrapolate KEYNOTE-024 trial pembrolizumab OS data suggest that the company's choice, in their base

case, to use an exponential distribution is the joint most pessimistic option; with the projection generated by their Weibull distribution being essentially equivalent to that generated by their exponential distribution. The company also chose, in their base case, to use an exponential distribution to extrapolate KEYNOTE-024 trial SOC OS data. The exponential distribution is also the most pessimistic of the considered options for extrapolating SOC arm data and leads to a substantially more pessimistic projection than any of the other distributions considered by the company.

Assuming that the same type of distribution is appended to both the pembrolizumab and SOC OS K-M data at 33 weeks, the ICER for the comparison of the cost effectiveness of pembrolizumab versus SOC varies between [redacted] per QALY gained when a generalised-gamma distribution is used to [redacted] per QALY gained when a Weibull distribution is used. The choice of distribution makes a substantial difference to the cost effectiveness of pembrolizumab versus SOC and highlights the uncertainty inherent in the long-term extrapolation of short-term trial data.

During TA428 the company provided evidence from the KEYNOTE-010 trial that, at 5 years between 11.97% and 26.80% of patients receiving pembrolizumab following chemotherapy would be alive; and at 10 years between 2.46% and 24.72% would still be alive. Assuming that the immunotherapies received by the [redacted] of patients in the KEYNOTE-024 trial were all as effective as pembrolizumab in the KEYNOTE-010 trial, it would be expected that, based on the projections provided by the company in their TA428 submission, the CS2 company model projections would show between 7.7 and 17.2% of patients alive at 5 years and between 1.6% and 15.8% alive at 10 years. The CS2 company base case projection suggests 9.1% of patients alive at 5 years (which is within the range previously projected) but the proportion expected to be alive at 10 years is 0.9%, which is much lower than previously estimated. The company's CS2 base case SOC OS projections, therefore, appear pessimistic compared with the company's previous projections.

~~In addition, the company has not provided any justification for their choice of time-point at which to append any distribution to KEYNOTE-024 trial data. Visual examination of the company's projections generated by appending exponential distributions (the company's base case choice of distribution) to K-M data at 23, 33 and 43 weeks (Figure 4, Figure 5 and Figure 6 respectively) suggests that the closest fit to the trial data occurs when distributions are appended at 43 weeks. There is still an indication from the end of the K-M data (albeit the data becomes heavily censored from week 100) that as this approach generates estimates of 9.6% of patients alive at 5 years and 1.5% alive at 10 years this extrapolation may still underestimate the long-term survival of patients receiving SOC.~~

The company provided justification for their choice of time point at which to append a distribution to KEYNOTE-024 trial data in Appendix L of CS2. The company identified three points where they considered the slope of the pembrolizumab and SOC K-M data changed (23, 33 and 43 weeks). The company chose to append a distribution at 33 weeks as this approach, which included adjustment for treatment switching, led to an estimated 5% of patients receiving SOC being alive at 5 years, the level of survival that the committee, during AC1, considered plausible (33 weeks). Commencing extrapolation at 43 weeks provides a 5-year OS estimate of 10% for patients receiving SOC. The company considers this to be clinically implausible. In the original ERG report, it was stated that the ERG considered that, based on available registry data, a survival rate of 10% at 5 years for patients receiving SOC was not implausible. The ERG considers that the company's projections generated by appending exponential distributions (the company's base case choice of distribution) to K-M data at 23, 33 and 43 weeks (Figure 4, Figure 5 and Figure 6 respectively) suggest that the closest fit to the trial data (for both arms) occur when distributions are appended at 43 weeks.

Figure 4

Figure 5

Figure 6

The choice of both the distribution used to extrapolate trial data and the time at which the distribution is appended to the K-M data are essentially arbitrary. However, the ERG considers that the distributions that, visually, best fit the data from both arms of the KEYNOTE-024 trial are exponential distributions appended at 43 weeks. The long-term accuracy of the projections for patients in both arms of the trial are, however, unknown.

1.4.5 Treatment stopping at two years

Within the TA447 ERG report, the ERG suggested that some patients may receive pembrolizumab for longer than 2 years, both in the trial and in a real-world setting. As part of the clarification process, the company provided time on treatment data for patients in the KEYNOTE-024 trial who received pembrolizumab (clarification question B1). These data showed (with censoring) that all but one patient had stopped receiving pembrolizumab within 110 weeks (just over two years). However, as there is still only 2 years of follow-up data from the KEYNOTE-024 trial the impact, if any, on the long-term survival of patients who stopped pembrolizumab at 2 years for reasons unrelated to disease status is unclear.

1.5 Impact of ERG amendments on cost effectiveness

In the company CS2 base case, pembrolizumab was estimated to generate an additional 0.96 QALYs at an additional cost of [redacted] compared to SOC (where SOC involves [redacted] of patients receiving immunotherapy following disease progression), with an ICER for the

comparison of the cost effectiveness of pembrolizumab versus SOC of [redacted] per QALY gained.

The ERG has suggested three amendments to the company CS2 model:

1. applying costs associated with the recommended dose of pembrolizumab after progression on chemotherapy
2. limiting the utility values used in the model to be no higher than the population norm
3. applying exponential extrapolations to KEYNOTE-025 OS K-M data from both arms of the trial at 43 weeks.

The impact of the ERG's three amendments on the costs and QALYs of treatment with pembrolizumab and on the ICER per QALY gained are shown in Table 7. Compared to the values generated by the company base case, the ERG's alternative scenario, which involves apply all three amendments, increase the incremental costs of treatment with pembrolizumab by [redacted] per patient and reduces the incremental QALYs by 0.15. These changes increase the size of the company base case ICER from [redacted] to [redacted] per QALY gained.

Details of the revisions made by the ERG to the company CS2 model can be found in Appendix 1

Table 4 ERG adjustments to company base case: pembrolizumab versus SOC (discounted, list prices)

Scenario/ERG amendment	Pembrolizumab			SOC			Incremental			*ICER*	
	Cost	QALYs	Life Years	Cost	QALYs	Life years	Cost	QALYs	Life years	£/QALY	Change from base case
A. Company base case	[redacted]										
R1) Cost of pembrolizumab in SOC in line with recommended dose	[redacted]										
R2) Utility value for >360 days to death set to population norm	[redacted]										
R3) OS extrapolation at 43 weeks for pembrolizumab and SOC	[redacted]										
B. ERG alternative scenario (R1-R3)	[redacted]										

ICER=incremental cost effectiveness ratio; OS=overall survival; QALY=quality adjusted life year; SOC=standard of care