- 10 know, depending on how you answer one question,
- 11 there's a subsequent question to get a more
- 12 precise estimate of what your actual score is.
- 13 But there are also single items, it's, you
- 14 know, really flexible. There are adult and
- 15 pediatric versions. It does extremely well in
- 16 all of your question one categories. It's
- 17 being used in two CAR T trials currently. It's
- 18 been used in many studies in the 65 and older
- 19 population as you can see above. Its measuring
- 20 properties really have been pristinely tested.
- 21 It also does extremely well in your question
- 22 two items really across the board. Again, you
- 23 know, I raise that question about age and net
- 24 benefit. You know, again, it does have overall
- 25 quality of life items in it so I guess, you

- 1 know, I would probably say yes, depending on
- 2 how you interpret that.
- 3 You know, the real limitation here is
- 4 that there are only a small number of domains
- 5 that you can measure with PROMIS, and so if you
- 6 want, you know, a wider number of things to be
- 7 measured in a trial, you're going to need

- 8 PROMIS plus something else, but for what it
- 9 measures, it really is excellent, in my
- 10 opinion.
- The ESRA, I was asked to comment on as
- 12 well. This really is not well known. As
- 13 alluded to in Katherine's presentation, this is
- 14 really not a well-known tool. I'm sorry, this
- 15 is not a PRO measure, it's an electronic
- 16 questionnaire system, so it's not really a PRO.
- 17 It happens to include three PRO measures in it,
- 18 the QLQ-C30 which you've heard about, the PHQ-9
- 19 which we haven't talked about, which is
- 20 actually an excellent measure of psychosocial
- 21 distress, anxiety, depression, which is
- 22 commonly used to assess depression, and the
- 23 Symptom Distress Scale, with is really kind of
- 24 a lesser used symptom scale. It's not really
- 25 been well tested, it's been very few trials

- 1 and, you know, because it's been used so
- 2 seldom, because it's not a PRO, I didn't even
- 3 go into evaluating it for questions one and
- 4 two, it wouldn't do well because it just hasn't
- 5 been tested in that way. To me it's not

- 6 applicable to these questions.
- 7 The FLIC, this is a PRO tool but also
- 8 not really well known, it's an old measure. It
- 9 had 22 items, it has physical, emotional,
- 10 social function, well-being, pain and nausea.
- 11 We could actually only find one cancer trial
- 12 using this tool, so really not well traveled in
- 13 the oncology space. And so again, we really
- 14 didn't really go through the 1.A -- I'm sorry,
- 15 the questions for one and two for this, because
- 16 there's just no data to evaluate, it really
- 17 wouldn't perform well, again, in our opinion.
- This graphic unfortunately, didn't
- 19 come over well when conveyed to CMS. It may
- 20 have come over better in the size it was
- 21 printed, or maybe it was censored.
- 22 (Laughter.)
- The double question marks from me were
- 24 smiley faces and the other ones were sad faces,
- 25 but maybe CMS felt they should be a little

- 1 milder. But in our opinion, the ones with
- 2 these double question marks are tools that are
- 3 well established, well tested and perform well,

- 4 and if I were designing a trial, with the
- 5 caveats that Paul mentioned in his FDA
- 6 presentation, we want to make sure that the
- 7 tools are appropriate to the domains of
- 8 interest. These are tools that I would be
- 9 comfortable considering, but the frowning
- 10 faces, not so much.
- All right. So just in the last
- 12 four-and-a-half minutes before I finish up,
- 13 there are some additional questions to the
- 14 panel. Are there other PRO assessments to
- 15 consider? I would say yes. One in particular
- 16 that I'd like to highlight called the FACT
- 17 GP-5, and this is a single item that asks
- 18 people if they are bothered by the side effects
- 19 of their treatment. This is a global
- 20 assessment of side effect burden. This is a
- 21 very helpful companion to the PRO-CTCAE, right?
- 22 Just to remind you, the PRO-CTCAE is the tool
- 23 where patients answer individual items about
- 24 their individual symptom side effects, right?
- 25 Do you have sleep disturbance? Do you have

1 taste disturbance? Do you have myalgia? This

- 2 is a global to go along with it. This is a
- 3 five-point response scale, it's well developed,
- 4 there's broad interest in using this, it's been
- 5 alluded to in numerous past FDA and EMA
- 6 presentations.
- 7 Are there additional desired
- 8 characteristics besides those in question two?
- 9 Yes, I think so. First the general, what we
- 10 call measurement properties, all these things
- 11 that Dr. Atkinson and I actually commented on
- 12 in our responses to you, content validity,
- 13 construct validity, reliability, sensitivity or
- 14 responsiveness, these are really key measuring
- 15 properties of an assessment tool, and really
- 16 both need to have been tested and demonstrated
- 17 to perform well for a good tool.
- Prior testing in populations with
- 19 cancer. The availability of language
- 20 translations, this is essential not just in the
- 21 U.S., but particularly outside the U.S. for
- 22 international trials. And then, you know, I'd
- 23 say really importantly, does this include items
- 24 that are salient to the CAR T population?
- 25 There really needs to be evaluation in this

- 1 population, probably qualitative with
- 2 interviews, asking patients about what's going
- 3 on with them very broadly so that we can
- 4 understand what are the outcomes that are
- 5 salient to this population, so we can then say
- 6 is this the right PRO instrument to use?
- 7 And this is really on the sponsors,
- 8 right? The sponsors spend a lot of money
- 9 developing their measurement tools, conducting
- 10 these trials. This is an essential part of
- 11 understanding the patients' experience. The
- 12 sponsors should be going out to patients in
- 13 their trials asking what they're experiencing
- 14 so they can substantiate the PRO metrics in
- 15 their trials and particularly in their
- 16 registries. I think in the real world, not
- 17 just in the registration trials, this
- 18 information needs to be collected.
- 19 All right. In conclusion,
- 20 patient-reported outcomes provide valuable
- 21 information about the patient experience and
- 22 about the characteristics of products that
- 23 cannot be well captured in any other way.
- 24 There are well developed available
- 25 patient-reported outcome tools that can be used

- 1 readily in CAR T trials that could be used
- 2 tomorrow. Yes, we can do more work to hone it
- 3 down, to get more specific to figure out what
- 4 exactly would be best to measure, but these
- 5 tools are shelf ready in many cases, but we
- 6 should do further work to really hone down and
- 7 understand what are the outcomes of interest.
- 8 Assessment of physical function,
- 9 symptomatic adverse events and disease-related
- 10 symptoms should be considered in any given
- 11 trial of oncology, including in this
- 12 population. Thank you very much.
- DR. ROSS: Great, thank you,
- 14 Dr. Basch, right on time, and to Dr. Atkinson
- 15 for his support of this presentation.
- So now we are turning from our, to the
- 17 scheduled public comments portion of our
- 18 meeting. Each speaker will be given six
- 19 minutes to speak and we have one, two, three,
- 20 four, five, six speakers, because one was
- 21 unable to attend. And we are, as each speaker
- 22 comes to the podium, I ask that the next
- 23 speaker comes to the chair to keep us moving
- 24 efficiently, and just as a reminder, to

- 1 conflicts of interests. And our first speaker
- 2 is Dr. Kathryn Flynn.
- 3 DR. FLYNN: Hi. So, just a note that
- 4 we submitted slides before we knew how long we
- 5 would have to talk, so I will be skipping over
- 6 some slides, but they are all available of
- 7 course online. So yes, I am Kathryn Flynn, I'm
- 8 an associate professor of medicine at the
- 9 Medical College of Wisconsin, and I am also as
- 10 of November last year, now senior scientific
- 11 director for patient-reported outcomes at the
- 12 Center for International Blood and Marrow
- 13 Transplant Research, the CIBMTR. So I am here
- 14 representing the CIBMTR, CIBMTR paid for my
- 15 travel to attend the meeting. I don't have any
- 16 personal financial disclosures related to
- 17 CAR T, but CIBMTR as an organization receives
- 18 federal funding from NIH, HRSA and the Navy,
- 19 and as you heard earlier today, has a cell
- 20 therapy registry contract with Kite.
- 21 So CIBMTR, for those of you who aren't
- 22 aware, collects and maintains clinical outcomes

- 23 data on all allogeneic transplants as required
- 24 by U.S. law. The centers also voluntarily
- 25 submit data on auto transplants, and worldwide

- 1 centers additionally submit data voluntarily.
- 2 So related to blood and marrow transplant
- 3 research, we, the registry has information on
- 4 nearly a half million, 475,000 patients that
- 5 are included in the database.
- 6 And we are now in the process of
- 7 implementing an e-PRO system that will be
- 8 available for use by the registry and the
- 9 affiliated trials network, the BMT CTN. So, I
- 10 will skip this one if I can. No. There we go.
- So we looked last year at the BMT CTN
- 12 studies that have collected PROs, and in 18
- 13 trials performed since 2004, half of those had
- 14 included as a primary or secondary outcome a
- 15 patient-reported outcome measure. Many
- 16 different measures have been used in these
- 17 studies, most commonly the SF-36 and FACT-BMT.
- 18 But we were looking to make some
- 19 recommendations going forward and thinking
- 20 about the implementation of this e-PRO system,

- 21 of what to recommend and so -- I'm having
- 22 trouble with this. I have to press it really
- 23 hard, I guess. Okay.
- So we had a couple of recommendations,
- 25 first to use the same core measures in all

- 1 research studies of HCT patients, use a system
- 2 that's free and easy to access, try to ensure a
- 3 low burden for the patient who's of course
- 4 undergoing a difficult treatment, using a
- 5 single versatile measurement system for core
- 6 concepts supplemented with additional measures
- 7 as necessary. And so thinking about the
- 8 registry context, the core system that was
- 9 recommended in this article by Brown and Shaw
- 10 was PROMIS. Even pressing really hard, I'm
- 11 having some difficulty there. Okay. I don't
- 12 know if it needs new batteries potentially.
- DR. ROSS: Don't worry, you can have
- 14 another minute.
- DR. FLYNN: Okay, thank you.
- So we've already hear about PROMIS,
- 17 I'm not going to go into detail there, but it
- 18 met those recommendations that we were hoping

- 19 for. Okay.
- 20 So just to reiterate a point just made
- 21 in the last talk, really the most appropriate
- 22 PROs to collect in cell therapy are unknown, so
- 23 there really is some foundational qualitative
- 24 work that needs to be done. We can probably
- 25 make some good guesses about some of the

- 1 domains that will be, that will need to be
- 2 measured, but to get into more specifics, there
- 3 does need to be some additional work done, I
- 4 think. However, once relevant constructs are
- 5 identified, there are absolutely multiple
- 6 available high quality measures that can be
- 7 used, and can choose the appropriate measures
- 8 and time points at that time.
- 9 Centers need a structure and process
- 10 to systematically collect PROs, and so what I'm
- 11 going to do with my remaining couple minutes
- 12 here is just describe the components of our
- 13 CIBMTR e-PRO system. So as you can see here,
- 14 the e-PRO system is the integration of
- 15 electronic patient-reported outcome collection
- 16 with our existing systems for collecting other

- 17 information, clinical information. So in the
- 18 bottom right we use Salesforce to track our
- 19 studies, participants, time points, activities.
- 20 At the bottom left is our integrated data
- 21 warehouse where the clinical outcomes data from
- 22 multiple sources are stored for research
- 23 retrieval. Top left as I mentioned, we did
- 24 identify PROMIS measures as that core system,
- 25 but certainly other measures can be added as

- 1 necessary, and so certainly for some of the
- 2 trials within the BMT CTN already we're adding
- 3 items from the PRO-CTCAE for those specific
- 4 studies.
- 5 And then to the right, note that we're
- 6 using Qualtrics as the patient interface for
- 7 administering patient-reported outcomes, so a
- 8 very flexible user friendly system for patients
- 9 to complete those PROs.
- 10 So, this system was developed with
- 11 funding from the Navy grant, our partner, the
- 12 National Marrow Donor Program, and our pilot
- 13 e-PRO study just started this summer. It is a
- 14 six-site pilot trial where we're examining

- 15 quality of life and PROMIS measures in patients
- 16 as part of the CMS MDS study. This is just
- 17 cross-sectional to explore the use of our
- 18 system, but certainly longitudinal studies will
- 19 be feasible as well.
- There is, just a note here, this is
- 21 just a brief overview of kind of the study
- 22 procedures, but to note that significant
- 23 planning and effort is required to manage this
- 24 central coordination of multisite PRO data
- 25 collection in terms of following patients at

- 1 multiple sites and getting their, you know,
- 2 being able to contact them directly, when
- 3 previously through the registry they are only
- 4 contacted by their local center, and so for the
- 5 CIBMTR directly to contact them is new.
- 6 And then the last thing I wanted to
- 7 mention is related to this. We've recently
- 8 organized a multidisciplinary working group of
- 9 about 30 or so people with expertise in many
- 10 different fields as part of a late effects task
- 11 force. And again, this is in the context of
- 12 BMT, but our goal is to develop a strategy for

- 13 the collection of late effects in patients that
- 14 are reported to the CIBMTR. So of course it's
- 15 a very heterogeneous population who's receiving
- 16 transplants, and so focusing on which
- 17 populations we should focus on to get kind of
- 18 routine PRO collection, what domains we need to
- 19 focus on, what measures to use, what time
- 20 points, these are all questions that we're
- 21 answering within the context of this task
- 22 force, and we have a nine-month time frame, we
- 23 started this summer and we're going to present
- 24 our recommendations at the Transplant and
- 25 Cellular Therapy conference which, in February

- 1 of 2019. That's it.
- 2 DR. ROSS: Thank you. Right on time.
- 3 Our next speaker is Karen Chung, the senior
- 4 director of health economics and outcomes
- 5 research for Juno Therapeutics.
- 6 DR. CHUNG: Good morning, everyone.
- 7 Again, my name is Karen Chung, senior director
- 8 of health economics and outcomes research at
- 9 Juno Celgene. I have been involved in
- 10 patient-reported outcome strategy analysis,

- 11 communication, for over 15 years in the
- 12 pharmaceutical industry, and I'm currently
- 13 employed by Juno Celgene and do have stock
- 14 options with them as well as other companies.
- 15 Celgene is developing investigational
- 16 CAR T-cell products which are not FDA approved,
- 17 and any data we discuss today is subject to
- 18 change. CAR T-cell agents are novel agents
- 19 which fulfill an unmet need in patients who
- 20 have not responded to front line therapy,
- 21 including Medicare patients. They have limited
- 22 effective treatment options as well as limited
- 23 survival. CAR T-cell therapies have been
- 24 administered across sites of care and as novel
- 25 therapies have a long-term follow-up to

- 1 continually assess efficacy as well as safety.
- 2 And while AEs are specific to each CAR T-cell
- 3 therapy, AEs are being increasingly identified
- 4 very quickly and managed very efficiently. And
- 5 while PRO measurement is important as it
- 6 represents the patient voids, it is very
- 7 complex from the clinical trial perspective and
- 8 even more so from the clinical practice

- 9 perspective.
- 10 Celgene is developing two CAR T
- 11 therapies which have the potential to
- 12 significantly transform patient outcomes.
- 13 JCAR017 is a CD19-directed CAR T-cell therapy
- 14 for non-Hodgkin's lymphoma. bb2121 is a B-cell
- 15 maturation antigen-directed CAR T-cell which is
- 16 currently in clinical trials for multiple
- 17 myeloma, and the other was for non-Hodgkin's
- 18 lymphoma. Each CAR T-cell therapy has a unique
- 19 targeted patient population, safety profile and
- 20 manufacturing process. As the science of CAR T
- 21 is rapidly evolving, we urge CMS to provide
- 22 flexibility to consistently ensure patient
- 23 access across all these disease states.
- While we strongly support the
- 25 incorporation of the patient voice into

- 1 clinical trials, we firmly believe PROs should
- 2 not be a condition of coverage due to the
- 3 significant barriers in the clinical practice.
- 4 And again, while we don't think PROs
- 5 are appropriate for coverage, we did want to
- 6 take a look at the question that CMS had asked

- 7 the panel to consider, and of the seven
- 8 instruments that were delineated, we feel that
- 9 four of the seven instruments could be
- 10 appropriate for clinical trials involving the
- 11 Medicare population.
- The first is the PRO-CTCAE which
- 13 Dr. Basch has mentioned. It does cover a wide
- 14 range of symptoms and so for symptom
- 15 assessment, it is a very useful tool.
- The MDASI, or M.D. Anderson Symptom
- 17 Inventory, covers a wide range of symptoms.
- The EORTC-QLQ-C30, which we
- 19 implemented in the JCAR017 and bb2121 trials,
- 20 is a comprehensive instrument that assesses
- 21 symptoms, functioning, as well as
- 22 health-related quality of life.
- The last instrument is PROMIS, which
- 24 is basically an item bank, which also covers
- 25 various symptoms as well as functioning.

- 1 This next question is really
- 2 considering all these instruments together, and
- 3 together, we feel that they have to have the
- 4 breadth of measurement specifically in

- 5 emotional, physical as well as social
- 6 well-being. They can be applied and have been
- 7 applied to clinical studies and can be used in
- 8 the clinical practice setting as well.
- 9 We didn't, we felt that they were
- 10 sensitive to differences in age, lines of
- 11 therapy, as well as comorbidities, and felt
- 12 that they were also generalizable and can be
- 13 used in combination therapy trials.
- 14 From end to end, PRO implementation in
- 15 clinical trials involves significant resources
- 16 in terms of both budget as well as head count.
- 17 We need to support instrument selection,
- 18 licensing, site training, data collection,
- 19 analysis, as well as interpretation. PRO
- 20 assessment in clinical practice is typically
- 21 even more challenging due to the lack of
- 22 infrastructure. Institutional barriers could
- 23 include the healthcare provider burden, the
- 24 additional FTEs that are necessary to
- 25 coordinate administration and data collection,

- 1 and the lack of consensus on which is the most
- 2 appropriate patient-reported outcome tool to

- 3 use. And then there's the, following the
- 4 scoring, the expertise needed in scoring and
- 5 analysis as well as interpretation.
- 6 Perhaps even more notably are the
- 7 patient barriers, and so we're asking these
- 8 Medicare patients who are typically very sick,
- 9 third line and beyond, to respond to these
- 10 questionnaires. They may have poor performance
- 11 status and they may also face technology
- 12 barriers as we move to more electronic
- 13 platforms to collect this data, so it's
- 14 something that they might not have the
- 15 experience to really manage to do well.
- So while patient-reported outcomes are
- 17 key measures in hematology and oncology trials,
- 18 including the CAR T-cell therapies, there are
- 19 important considerations, which includes the
- 20 wide range of tumor types and stages, also the
- 21 broad areas of concepts. You know, are we
- 22 interested in physical functioning,
- 23 disease-related symptoms, adverse events, or
- 24 health-related quality of life, you know, which
- 25 do we focus on. And due to the diverse nature

- 1 and range of symptoms across and within tumor
- 2 types, as well as the administrative burden,
- 3 assessing patient-reported outcomes with
- 4 validated instruments is complex.
- 5 Celgene has incorporated relevant PRO
- 6 assessments in CAR T-cell clinical trials to
- 7 complement clinical safety and efficacy data,
- 8 which we feel is very important. However,
- 9 while we feel it's very important in the
- 10 clinical trial setting, we don't feel they
- 11 should be a condition of coverage.
- DR. ROSS: Great, thank you very much.
- DR. CHUNG: Thank you.
- DR. ROSS: Our next speaker is
- 15 Dr. Surbhi Sidana, from the Mayo Clinic.
- DR. SIDANA: Good morning and thank
- 17 you for this opportunity. I am a
- 18 hematologist/oncologist and I am not a PRO
- 19 expert, but I'm leading two studies of PROs,
- 20 including one of CAR T, and I just want to
- 21 speak to the panel of the challenges we have
- 22 faced in trying to design and lead the study.
- 23 So, here are my disclosures, and ASBMT is
- 24 paying for my travel to this meeting.
- This data has already been shown so I

- 1 will not belabor this data anymore. However,
- 2 CAR T-cell therapy is a novel therapy which has
- 3 shown exceeding promise in patients who did not
- 4 have other treatment options before. It has
- 5 unique side effects, and some of the side
- 6 effects we are not even aware about in the long
- 7 term.
- 8 There is, the process for assessing
- 9 PROs has already been discussed in detail and
- 10 so I want to focus on the approaches of
- 11 assessing PRO in patients with CAR T-cell
- 12 therapy. We have conducted several studies in
- 13 the last couple of years in hematology which
- 14 have used various methods of assessing PROs.
- 15 So let's focus on the challenges of conducting
- 16 the study, and this is from my personal
- 17 experience in conducting the study.
- So what is an optimal outcome that we
- 19 should use and what instruments should we be
- 20 using? Seven instruments are being asked, you
- 21 know, you're rating seven instruments today.
- 22 In my study I'm using a completely different
- 23 instrument because on my clinical judgment I
- 24 thought that was a better instrument, along
- 25 with some of the instruments we're reviewing

- 1 today. So even though we have validated
- 2 instruments, not everybody agrees that those
- 3 instruments should be the same in different
- 4 studies.
- 5 Second, how do we account for missing
- 6 data? A lot of patients who are undergoing
- 7 CAR T-cell therapy will have side effects, get
- 8 in to the ICU, and these patients potentially
- 9 will have significant missing data leading to
- 10 bias. A lot of times patients come to referral
- 11 centers like Mayo Clinic for their treatment,
- 12 and then they go back to their local doctor.
- 13 So if we are going to use long-term data, we
- 14 might miss patients who are now gone from the
- 15 referral center.
- And then the third thing, do we just
- 17 collect this data or do we do something about
- 18 it? As a doctor it's challenging. You're
- 19 asking patients to give their symptoms and then
- 20 you feel you're ethically obliged to do that,
- 21 this also keeps the patients engaged. However,
- 22 there are problems with that. It requires a
- 23 huge infrastructure. It also requires

- 24 consensus to say when are we going to
- 25 intervene. For example, if you ask a patient

- 1 for pain, do we intervene for a pain at seven
- 2 out of ten, eight out of ten or nine out of
- 3 ten? Is seven different than eight? And
- 4 similarly for other symptoms as well. That
- 5 will also require a lot of resources that
- 6 centers and the community will not have
- 7 present.
- 8 The other thing that is challenging,
- 9 we want to assess how is the patient's quality
- 10 of life in respect to the side effects they
- 11 experienced initially, and that's problematic
- 12 because right now all the different CAR T
- 13 trials are assessing toxicity differently,
- 14 Grade 3 CRS in one trial is not the same as
- 15 Grade 3 CRS in another trial. The management
- 16 of toxicities at my institution is very
- 17 different from management of toxicities at
- 18 another institution, so this is going to impact
- 19 how we interpret this data and what this data
- 20 means.
- And then as many people have already

- 22 alluded, CAR T-cell studies are currently being
- 23 conducted in various hematologic and oncologic
- 24 malignancies and currently are approved for two
- 25 diseases, ALL as well as non-Hodgkin's

- 1 lymphoma. We expect that soon they will be
- 2 approved for other diseases like multiple
- 3 myeloma, and the short-term toxicity has really
- 4 varied across different trials based on what
- 5 instrument, what construct and what disease.
- 6 For example, a lot more CRS was seen in
- 7 non-Hodgkin's lymphoma than was seen in
- 8 multiple myeloma, so how can we put all of
- 9 these patients together with different diseases
- 10 which have different symptoms, different
- 11 constructs, and say we're going to measure all
- 12 of these the same?
- And then, what is our benchmark? As
- 14 has been shown before, these patients with
- 15 non-Hodgkin's lymphoma previously did not have
- 16 many treatment options, their median survival
- 17 was six months, and now it's not being reached.
- 18 So how do we decide what's reasonable quality
- 19 of life or what's reasonable physical function

- 20 in these patients? How do we compare them to
- 21 historical controls or even how do we compare
- 22 them to their baseline what is reasonable?
- So I think there's a lot of room for
- 24 study at this point. We are conducting pilot
- 25 studies at my institution and several other

- 1 institutions to address what's the feasibility,
- 2 where is the missing data, how can we do this
- 3 better, and do we need specific measures
- 4 specific to CAR T-cell therapy? And then in
- 5 the context of a working group, we need to come
- 6 up with a consensus before we design a
- 7 larger-scale study. I think at present we need
- 8 at least 12 months to come up with a consensus
- 9 based on preliminary data from our study and
- 10 the studies being done at other institutions.
- 11 Thank you.
- DR. ROSS: Thank you, Dr. Sidana. Our
- 13 next speaker is Dr. Cori Abikoff, the medical
- 14 director for CAR T at Novartis.
- DR. ABIKOFF: Thank you very much for
- 16 allowing me to speak today. I'm Cori Abikoff,
- 17 I'm a medical director for the CAR T program at

- 18 Novartis Pharmaceuticals Institution. My
- 19 expertise is in pediatric stem cell transplant
- 20 as well as adult and pediatric apheresis. I am
- 21 a paid employee of Novartis.
- 22 Kymriah, the Novartis CAR T product,
- 23 is the first FDA-approved gene therapy product
- 24 on the market. It is currently approved in two
- 25 indications, both pediatric and young adult

- 1 relapsed or refractory ALL, as well as adult
- 2 relapsed or refractory large B-cell lymphoma.
- 3 It's been extensively studied in clinical
- 4 trials, both for validated clinical outcomes as
- 5 well as PRO data, as was previously presented
- 6 by my colleague, Dr. Ilia Ferrusi. It also
- 7 continues to be studied in the outpatient, in
- 8 the commercial setting under a risk evaluation
- 9 and mitigation strategy.
- 10 As was previously discussed, chimeric
- 11 antigen receptor therapies essentially are a
- 12 living drug, which allows the patient's tumor
- 13 to be targeted by the patient's own immune
- 14 system through a process of gene modification.
- 15 This is a complex process that requires that

- 16 the patient's own immune cells be removed, gene
- 17 modified, and returned to the patient in a
- 18 setting which has a degree of complexity that
- 19 means that the timeline must be observed due to
- 20 the significant burden of illness in these
- 21 patients.
- Novartis has chosen to study a
- 23 population of patients who have significant
- 24 burden of illness. Although pediatric ALL is
- 25 not a common condition, it is the most common

- 1 cancer of childhood, and relapsed and
- 2 refractory ALL represents the most common cause
- 3 of childhood cancer death, falling only behind
- 4 accidental injuries and inflicted injury,
- 5 whereas diffuse large B-cell lymphoma is a more
- 6 common illness and one that is more likely to
- 7 affect the Medicare population.
- 8 In both cases when the disease is
- 9 relapsed and refractory, there are incredibly
- 10 limited treatment options, and these usually
- 11 require incredibly toxic therapies that in
- 12 order to reach standard of care with even
- 13 acceptable outcomes requires the use of a stem

- 14 cell transplant.
- In the JULIET trial where we treated
- 16 patients with diffuse large B-cell lymphoma,
- 17 you can see that approximately a quarter of our
- 18 patients were over the age of 65 and these
- 19 patients were heavily pretreated, with more
- 20 than half of them having received three or more
- 21 prior chemotherapies and having been refractory
- 22 or relapsed to those therapies, and almost half
- 23 of these patients having already received a
- 24 standard of care therapy of autologous stem
- 25 cell transplant.

- 1 Unlike the data that's previously been
- 2 shown regarding complete responses as low as
- 3 seven percent, the JULIET trial had a best
- 4 overall response of 52 percent, complete
- 5 response rate of 40 percent. This is really
- 6 unheard of in this population. And when we
- 7 look across the groups again, you can see that
- 8 the patients aged 65 or older had a 59 percent
- 9 overall response rate, consistent across all
- 10 subgroups with the overall response in our
- 11 trial.

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- 13 response, but the ability of these responses to
- 14 be sustained, and you can see that in patients
- 15 who were complete responders, there was a 95
- 16 percent overall survival at one year and 78.5
- 17 percent of patients were relapse-free during
- 18 this time point.
- 19 In addition because of the living
- 20 nature of this drug, patient response is not
- 21 determined by their initial response, but in
- 22 fact 54 percent of patients will progress from
- 23 a partial response to a complete response over
- 24 time frames as long as nine to 12 months.
- These are not benign therapies, and

- 1 certainly we acknowledge the adverse events
- 2 that need to be followed. Here in the JULIET
- 3 trial you can see that adverse events greater
- 4 than, at Grade 3 or higher, included 23 percent
- 5 of patients with CRS, and 18 percent of
- 6 patients with neurological toxicity. We also
- 7 evaluated toxicity such as infection, and
- 8 longer-term toxicities such as
- 9 hypogammaglobulinemia.

10	It is important to understand that
11	Novartis too has begun collaboration with the
12	CIBMTR in order to provide a registry which
13	will follow 2,500 patients, including at least
14	1,500 patients with diffuse large B-cell
15	lymphoma, for 15 years after their therapy.
16	This is in accordance with the FDA guidelines
17	and includes an incredibly robust amount of
18	information, including patient-level
19	characteristics as well as disease
20	characteristics, and the efficacy and short-
21	and long-term safety information that can be
22	followed for these patients. By partnering
23	with the CIBMTR, we choose a leader in registry

data for cell therapy, and one that all of our

sites are familiar with. By doing so, we

- 1 believe this will encourage early and robust2 use of this registry data, and encourage and
- 3 ensure that the real world data that's
- 4 collected really reflects the patient
- 5 population who is being treated with Kymriah.
- 6 In addition to this by partnering with the
- 7 CIBMTR, the data is not only owned by Novartis

- 8 but it actually belongs, in fact belongs in the
- 9 purview of CIBMTR, allowing access to that data
- 10 and the analysis sets that can be considered to
- 11 be done by CIBMTR and their research networks,
- 12 as well as Novartis and health authorities.
- As a clinician not far out from being
- 14 part of the care provided to patients who would
- 15 be receiving Kymriah, I am not, the importance
- 16 of treating patients and including them in
- 17 decisions about their care is not lost on me,
- 18 but Novartis does urge CMS to leverage the
- 19 existing data as well as the robust mechanisms
- 20 for further data collection in order to make
- 21 decisions about how best to approach payment
- 22 decisions. Thank you.
- DR. ROSS: Thank you, Dr. Abikoff.
- 24 The next speaker is Dr. Merav Bar, assistant
- 25 member of the Fred Hutchinson Cancer Research

- 1 Center.
- 2 DR. BAR: I am Merav Bar, I'm an
- 3 assistant member at the Fred Hutch in Seattle
- 4 and I'm a transplanter, and I also take care of
- 5 patients after CAR T-cell therapy, and I'm also

- 6 part of the long-term follow-up team for
- 7 patients after transplant, and we are now
- 8 building also our long-term follow-up for
- 9 patients after receiving CAR T-cell therapy.
- 10 And today I'm mainly focused on question number
- 11 four regarding timing of evaluations of PROs in
- 12 patients after CAR T-cell therapy and mainly
- 13 for the long-term follow-up of those patients.
- 14 My disclosure, I have no personal
- 15 financial or intellectual conflicts of
- 16 interest. However, I just learned after I
- 17 submitted this slide that a member of my family
- 18 has shares in Bluebird.
- For long-term follow-up of patients
- 20 after CAR T-cell, most patients participating
- 21 in CAR T-cell studies have been followed only
- 22 for a short period of time, most studies for
- 23 one or two years after they receive treatment.
- 24 And the two commercial CAR T-cell products have
- 25 only been approved in the last year by the FDA.

- 1 Therefore, the data regarding those patients is
- 2 also limited in time. So, currently there is
- 3 only limited data regarding the long-term

- 4 effects of those treatments.
- 5 Main concerns regarding long-term
- 6 effects of CAR T-cells are prolonged B-cell
- 7 aplasia with a hypogammaglobulinemia, acquired
- 8 infections secondary to that, subsequent
- 9 malignancies, and also new incidence or
- 10 exacerbation of neurologic or autoimmune
- 11 disorders.
- There are objectives of a long-term
- 13 follow-up after CART T-cells, which are to
- 14 identify and mitigate the long-term risks of
- 15 patients receiving treatment, and capture
- 16 delayed adverse events.
- 17 There are several challenges in
- 18 long-term follow-up of patients after CAR T-cell
- 19 therapy. Most of them are the heterogeneous
- 20 patient populations, the variety of the
- 21 constructs of the CAR T-cells product.
- 22 Although currently the two approved products
- 23 and also for most of the products that are
- 24 under investigation target the CD19, in the
- 25 future we will see more products with different

1 targets, that they will affect the toxicity and

- 2 the safety profiles of those products.
- 3 There is a transition of care of the
- 4 patients; most of the patients come to big
- 5 centers in order to get the CAR T-cell therapy.
- 6 However, after a short period of time of a
- 7 month or two they return back to their
- 8 referring physician, so it is a challenge to
- 9 follow them for the long term.
- Although there is very good responses
- 11 that have been reported with the CAR T-cell
- 12 products, there is still a relatively high rate
- 13 of relapse of those patients and therefore, the
- 14 patients are subsequently exposed to other
- 15 treatment which will affect how the patients
- 16 are feeling, their quality of life and side
- 17 effects that you would see in the long term.
- 18 And additionally, patients have multiple
- 19 comorbidities that will affect the PROs.
- And there are also specific challenges
- 21 when you are talking long-term quality of life
- 22 after CAR T-cell therapy. So for example,
- 23 there is no validated instrument for quality of
- 24 life and we see that there are different
- 25 options that can be used, there is lack of

- 1 uniformity between centers. So although there
- 2 is a number of centers that incorporate PROs
- 3 into evaluation of patients after CAR T-cell
- 4 therapy, there is no uniformity, and also, we
- 5 don't know what optimal study design is.
- 6 In addition, other people here also
- 7 reported about the significant resources that
- 8 are indicated, so we need the resources in
- 9 order to build the questionnaires into
- 10 electronic forms, to follow-up with the
- 11 patients after leaving the treatment center
- 12 back to their referring physician, and we need
- 13 a lot of resources in order to collect the data
- 14 and then to analyze the data.
- 15 In our institution we right now are
- 16 studying a pilot study to evaluate a patient
- 17 after CAR T-cells and the objective is mainly
- 18 feasibility, and we are using mainly the PROMIS
- 19 Global Health and PROMIS-29, which have been
- 20 validated in the transplant setting. And
- 21 currently as I said, there is a variability
- 22 between centers and there are only a small
- 23 number of studies that are currently ongoing,
- 24 and we support a collaborative work group in
- 25 order to provide recommendations for the

- 1 instrument to be used, unify the study design,
- 2 harmonization of the data, and potentially
- 3 define a multicenter study between
- 4 institutions. So currently, we think that
- 5 efforts should be made in order to incorporate
- 6 the PROs in CAR T-cell studies. However, we
- 7 don't feel that PRO should be mandated for
- 8 payer reimbursement for CAR T-cell therapies.
- 9 DR. ROSS: Great, thank you, Dr. Bar.
- 10 Just before, I want to confirm that Dr. Heather
- 11 Jim is not in the audience because she wasn't
- 12 able to get here today. Good.
- So our last speaker will be Dr. Gunjan
- 14 Shah, hematologic oncologist at Sloan
- 15 Kettering, who's representing the American
- 16 Society for Blood and Marrow Transplantation.
- 17 DR. SHAH: Hi everyone, thank you for
- 18 allowing me to speak with the committee. I am
- 19 a bone marrow transplant physician and also
- 20 work on cellular therapies, as well as part of
- 21 the health-reported outcomes program at MSK,
- 22 and I am receiving travel funds today and am
- 23 speaking on behalf of our program as well as
- 24 the ASBMT.

- 1 last several hours about what patient-reported
- 2 outcomes are and the differences with the
- 3 different scales, and we agree with a lot of
- 4 the comments already presented.
- 5 What I'd like to do with my time today
- 6 is present to you how we have used several
- 7 different scales and changed over time and
- 8 incorporated them into different trials, as
- 9 well as how we are converting these into a
- 10 standard of care approach across our entire
- 11 service, as well as for the CAR T-cell
- 12 patients, in terms of how to capture these by
- 13 paper surveys and our conversion to an
- 14 electronic process, and whether we're going to
- 15 use them for research and clinical care, and
- 16 how that works.
- 17 So, I present this today just as a
- 18 review article that was done in Transplant
- 19 looking at 114 studies, and you've learned
- 20 today along the way of how many different
- 21 patient-reported outcome measures there are,
- 22 and why they can be used in different ways, and

- 23 how they do tend to cluster around certain
- 24 symptoms and certain assessments that can be
- 25 used at different times.

- 1 On the upper right you can see a
- 2 picture of sort of the different subscales of
- 3 the MDASI that are disease-based, and what
- 4 we've used over the last five to ten years in
- 5 many of the transplant trials, specifically the
- 6 autologous transplant trials, has been the
- 7 MDASI myeloma scale. And what we've been able
- 8 to do in that and the reason we use it is it's
- 9 been able to be done at several time points
- 10 through the first 30 days, and you've seen
- 11 today that there are differences in kind of the
- 12 scale of early toxicities and sort of later
- 13 recovery. And what we've done is been able to
- 14 look at changes over time using an area under
- 15 the curve method, and so being able to condense
- 16 a lot of that information into one data point
- 17 that can be compared, especially in
- 18 intervention studies where you're really trying
- 19 to affect the system burden as opposed to just
- 20 collecting some of this information.

- On the bottom right, you've seen this
- 22 already today, is the PRO-CTCAE, and we've
- 23 incorporated this into more recent trials and
- 24 used the symptom bank in a way to actually
- 25 incorporate similar questions to the MDASI to

- 1 see if patients really answered the questions
- 2 the same way. We also in our long-term
- 3 maintenance trials and microbiota trials have
- 4 specifically taken out the questions that are
- 5 related to diarrhea and constipation and other
- 6 GI symptoms, and have been able to correlate
- 7 those with the collected stool samples.
- 8 On the upper left you see the PROMIS
- 9 score that's also been described many times
- 10 today, and the reason I present this here is
- 11 that we are in the process of converting from
- 12 the MDASI over to the PROMIS scale to better be
- 13 generalizable across centers and as you've
- 14 seen, you know, the plans from the CIBMTR and
- 15 several other centers that have presented
- 16 today, and so in an effort to be able to
- 17 combine data, we are switching over to this
- 18 scale.

- The bottom left, you can see sort of
- 20 what the paper version of a survey looks like,
- 21 and sort of a scale system of this as being a
- 22 five-point scale versus some others being
- 23 ten-point scales.
- 24 Our informatics colleagues and
- 25 surgical colleagues, using a grant from PCORI,

- 1 have converted the MSK system from a paper
- 2 format to what they call MSK Engage, or an
- 3 online system for collecting some of this
- 4 information, and we're going to adopt this over
- 5 to the transplant service and cellular
- 6 therapies.
- 7 On the left side you can sort of see a
- 8 particular patient's symptoms over time, and
- 9 this is going to be available in the clinic,
- 10 that you can look at a particular patient,
- 11 convert it into their electronic record, and
- 12 sort of follow them over time for a particular
- 13 patient. Partly this is important because we
- 14 are, and our institution has determined that it
- 15 is important to act in some way on this
- 16 information in real time, and so you can set

- 17 criteria of if you are above a particular
- 18 score, that they will send a message both to
- 19 the patient to call the office, but also to the
- 20 office practice nurse to call the patient and
- 21 determine if further things need to be done
- 22 about it.
- On the right side you can kind of see
- 24 information sort of that was presented by other
- 25 colleagues today of how do we present that

- 1 information and what do we do with it in terms
- 2 of both a research and clinical following over
- 3 time. And so we have software where you can
- 4 aggregate this data across trials, across
- 5 patients, and present data in a very
- 6 interesting way to be able to look at both
- 7 intervention trials, as well as just following
- 8 over time.
- 9 And so we're going to be incorporating
- 10 all of this into our proposed new plan going
- 11 forward.
- 12 And so, we know in the CAR T-cell
- 13 space that patient-reported outcomes are still
- 14 in development and too early to mandate in

- 15 terms of coverage. However, we do agree that
- 16 these are important to capture and study in
- 17 both the clinical trial and commercial setting,
- 18 which is what we are embarking on as well now,
- 19 that we are going to use the PROMIS scale,
- 20 PROMIS-29, and do weekly assessments, and
- 21 follow that with monthly assessments for the
- 22 first year using our electronic system, and be
- 23 able to capture whether this is partly feasible
- 24 and partly their scale over time.
- One of the interesting things in this

- 1 and part of the discussion in our switching
- 2 from MDASI to PROMIS was the time frame of all
- 3 of this, that the MDASI scale was in a 24-hour
- 4 recall period versus the one-week recall period
- 5 of the PROMIS scale. There are sort of pluses
- 6 and minuses obviously on both sides of this,
- 7 but one of the things that, we think that some
- 8 of the missing data can probably be accounted
- 9 for by having this every seven day scale, that
- 10 there are those days where you were in the ICU
- 11 or you weren't able to answer some of the
- 12 questionnaires on any sort of every 24-hour

- 13 scale, but over the last week be able to
- 14 aggregate some of that data, and potentially
- 15 account for less missing data with that.
- The other sort of further along
- 17 questions that have been asked by the committee
- 18 in terms of timing and feasibility, we do agree
- 19 that the three- to six-month window seems to be
- 20 the most reasonable option because of the
- 21 patients going back as has been described by
- 22 other people, and we do think that the use of
- 23 technology can allow for more collections over
- 24 time, and we look forward to working with CMS
- 25 and the rest of the people who have discussed

- 1 today about doing this over time. Thank you.
- 2 DR. ROSS: Thank you, Dr. Shah. That
- 3 concludes our scheduled public comment period.
- 4 We have had one individual sign up for
- 5 the open public comment period and they have
- 6 been told that they will have one minute at
- 7 this front mic to make comments, and that is
- 8 Mallory O'Connor. Please introduce yourself,
- 9 and make sure to disclose your conflicts of
- 10 interest.

- 11 MS. O'CONNOR: Thank you. My name is
- 12 Mallory O'Connor, with the Biotechnology
- 13 Innovation Organization. BIO is an industry
- 14 trade association, so we do represent
- 15 manufacturers of CAR T-cell therapies.
- And I will be very brief here today,
- 17 but thank you for your time. The Biotechnology
- 18 Innovation Organization appreciates the
- 19 opportunity to provide comments to the MEDCAC
- 20 during this meeting on the state of evidence
- 21 for CAR T-cell therapies.
- BIO is the world's largest trade
- 23 association representing biotechnology
- 24 companies, academic institutions, and state
- 25 biotechnology centers and related

- 1 organizations. We appreciate the committee's
- 2 focus on developing better understanding of the
- 3 patient experience and PROs in cancer clinical
- 4 studies and care. BIO believes that patients
- 5 must be involved in decision-making regarding
- 6 their care and that patients and patient
- 7 advocacy organizations play a vital role
- 8 throughout the drug development process as they

- 9 know what desired outcomes, risks, and other
- 10 considerations are most appropriate for their
- 11 disease states and the diseased states that
- 12 they serve.
- We believe an open stakeholder
- 14 dialogue on PROs is an important and useful
- 15 exercise across many therapy areas, but we have
- 16 significant concerns around the use of PROs in
- 17 governing coverage decisions, particularly for
- 18 this new therapy area serving vulnerable
- 19 Medicare beneficiaries. It is critical to
- 20 ensure that Medicare patients are able to
- 21 receive timely access to the highest standard
- 22 of treatment for their health condition.
- We therefore urge MEDCAC and the
- 24 Agency to move forward cautiously in the NCA
- 25 process and not to incorporate PROs into

- 1 coverage determinations for CAR T. BIO's
- 2 position is detailed further in written
- 3 comments submitted to MEDCAC in advance of this
- 4 meeting, and in response to the NCA. Thank you
- 5 very much.
- 6 DR. ROSS: Thank you very much.

- 7 So, that concludes the morning session
- 8 of the formal presentations and both the
- 9 scheduled public comments and open public
- 10 comment period. We are running a half an hour
- 11 ahead of schedule, which I was told is a good
- 12 thing, that will allow people to get into the
- 13 cafeteria before the CMS lunch rush.
- People are asked to return to this
- 15 room in 60 minutes, by 12:30, so you actually
- 16 have 63 minutes to eat lunch.
- MS. ELLIS: Excuse me. When we come
- 18 back from lunch, if all of the presenters could
- 19 please sit in the very first row where it says
- 20 reserved, for the second half? Thank you.
- 21 (Luncheon recess.)
- DR. ROSS: If people could start
- 23 coming in and taking their seat, I just want to
- 24 remind all presenters to take an assigned seat
- 25 in the front row.

- 1 MS. JENSEN: All right, we're going to
- 2 get started because I want to make sure that
- 3 everybody is able to get out on time to make
- 4 their flights.

- 5 So for the panel and for the speakers,
- 6 this is the time for the panelists if they have
- 7 any questions, that they can ask any of the
- 8 speakers those questions. We have an hour, so
- 9 hopefully we can keep our answers succinct as
- 10 best as possible, so that we can get through
- 11 everybody's answers and all the panelists'
- 12 questions, so that they will be able to answer
- 13 our 23 questions at the end of the meeting.
- 14 All right.
- DR. ROSS: Great, so at this point
- 16 I'll just open it up to the committee to see if
- 17 anyone has questions for the presenters.
- DR. GOSS: I have a couple of
- 19 questions, one is for the panel members or for
- 20 the speakers. Do either of the existing CAR T
- 21 therapies that were approved by the FDA have a
- 22 labeled claim for PRO outcomes? We heard that
- 23 the FDA has a very clear set of standards for
- 24 PRO outcomes. Have either of those products
- 25 had a labeled claim that reports PRO data, or

- 1 do they have PRO data reported as part of their
- 2 clinical trial endpoints on the label?

- 3 DR. GO: Hi again, Will Go from Kite.
- 4 We do not have any labeled claim to my
- 5 knowledge in our USPI for PROs.
- 6 DR. GOSS: Okay, thank you.
- 7 DR. ABIKOFF: Novartis also does not
- 8 have any labeled claim with regard to PROs
- 9 within our U.S. label.
- DR. GOSS: Do you have it in other
- 11 labels?
- DR. ABIKOFF: Within our European
- 13 labels.
- MS. ELLIS: Excuse me. Could you
- 15 please state your name for the record?
- DR. ABIKOFF: Sorry. Cori Abikoff,
- 17 from Novartis.
- 18 MS. ELLIS: Thank you.
- 19 DR. ABIKOFF: Within our European
- 20 labels we do.
- 21 DR. GOSS: Can you --
- DR. ABIKOFF: I can't speak to the
- 23 specifics.
- DR. GOSS: Can you suggest why it's
- 25 not in the U.S. label, versus an EU label?

- 1 DR. ABIKOFF: I don't have access to
- 2 that specific information.
- 3 DR. GOSS: I have another question.
- 4 In terms of the CAR T trials. What percent of
- 5 the patients, where both sponsors mentioned
- 6 that in the pivotal trials PROs were used, what
- 7 percent of the patients failed to complete
- 8 scheduled assessments at scheduled time points
- 9 when PROs were used, and how did you address
- 10 that in terms of responder bias?
- DR. ABIKOFF: I'm going to actually
- 12 ask Dr. Ferrusi to respond to that question.
- DR. ROSS: I want to just remind
- 14 speakers at the mic, because I've been told the
- 15 same, please speak up so everybody can hear and
- 16 the mic picks it up. Thanks.
- DR. FERRUSI: Thank you. Ilia
- 18 Ferrusi, with Novartis. I don't have the exact
- 19 percentage and what I can tell you is that in
- 20 the JULIET study analyses of the PRO data, we
- 21 focused on patients who did have a complete
- 22 response or a partial response there because
- 23 that's where we had data to analyze.
- DR. GO: Will Go from Kite. In our
- 25 pivotal ZUMA-1 study it's a single-armed design

- 1 so we did not do any prospective PROs in
- 2 cohorts one and two of the pivotal study, which
- 3 was the data that was used for the labeling of
- 4 the USPI. We then incorporated PROs as
- 5 exploratory endpoints in additional cohorts of
- 6 ZUMA-1, such as in cohort three. This has not
- 7 been reported out yet, so we don't have that
- 8 data on hand, but this is obviously one of the
- 9 challenges that we, as other speakers have
- 10 said, in terms of collecting missing data.
- 11 As I said on the podium, ZUMA-7, our
- 12 randomized controlled phase three global
- 13 trial we are collecting PROs prospectively
- 14 and it is a secondary endpoint.
- DR. ROSS: Thank you.
- DR. CUYJET: Aloysius Cuyjet. This
- 17 question is for Dr. Basch, am I pronouncing
- 18 that correctly? First I'd like to thank you
- 19 for a very cogent presentation of the different
- 20 PRO tools. Anytime I see seven of anything, I
- 21 know one of them is not an ideal tool to
- 22 provide the information. So what I'd like to
- 23 ask you, what suggestions might you have in
- 24 terms of improving the patient-reported
- 25 outcomes process, since we have seven different

- 1 instruments to look at? What would you to do
- 2 to come up with one or two ideal instruments?
- 3 DR. BASCH: All right. Ethan Basch
- 4 for the University of North Carolina, so do you
- 5 mean in this particular population or in
- 6 general?
- 7 DR. CUYJET: Well, I haven't seen
- 8 any -- it's a whole area for discussion, so I'm
- 9 assuming, and I'm taking to -- I'm going back
- 10 to my experience at Rutgers Medical School
- 11 where we had robust end of life care, so
- 12 patients would make decisions based on how much
- 13 pain they were having, how much sleep they got,
- 14 who in their family they spoke to, so I'm sure
- 15 there's diversity in genders, there's diversity
- 16 driven by cultural backgrounds, ethnicity,
- 17 socioeconomic status, education status, there's
- 18 a whole list of variables that we consider in
- 19 how patients report outcomes, and I'm clearly
- 20 not an expert in that field. So if you had to
- 21 come up with an instant, what additional
- 22 questions or parameters would you want to look
- 23 at?

- 1 Dr. Kluetz from the FDA may also have some
- 2 insights on this.
- 3 So in terms of putting together a tool
- 4 that would give us insights about how people
- 5 feel with this therapy, you know, I go back to
- 6 something that I mentioned and Dr. Kluetz did
- 7 as well, that physical functioning is very
- 8 important. Now physical -- you know, a lot of
- 9 people talked about oh, we don't know what
- 10 tools we can use yet, we have to go back and,
- 11 you know, start at first principles. That's
- 12 not the case for physical function, physical
- 13 function is physical function, right? I mean,
- 14 I see patients getting all kinds of therapy
- 15 with all different diseases, and physical
- 16 function is pretty uniform, there are excellent
- 17 tools which are already available, some of
- 18 which are on your list.
- 19 You know, the EORTC QLQ-C30 has very
- 20 good physical function, PROMIS has very good
- 21 physical functioning. I think those are ready

- 22 now and in an assessment I would absolutely
- 23 include them, number one.
- Number two, I would measure, I would
- 25 let patients self-report their own side

- 1 effects. We know that this is, you know, it's
- 2 not that it's underreported, it's just that we
- 3 miss a lot of stuff and we misattribute.
- 4 Patients know better than we do as
- 5 investigators, so I'd absolutely include
- 6 symptomatic adverse events. And to figure out
- 7 what adverse events are important in a given
- 8 trial, that's really dependent on the products
- 9 that are being tested and what's known about
- 10 those products, and hypothesizing over time as
- 11 we accumulate experience, you know, we start to
- 12 know, okay, which ones should we ask, and those
- 13 gets loaded into a form. So now you've got a
- 14 form that's got physical function and a bunch
- 15 of side effects, right?
- And then the third, I think, which is
- 17 more challenging, and Paul Kluetz can comment
- 18 on this, is disease-related symptoms. I think
- 19 that's a little more challenging in this

- 20 context but that could be considered, I'm going
- 21 to put that aside for a moment.
- And then the final piece is overall
- 23 quality of life, and that includes some of the
- 24 domains we talked about, you know, emotional or
- 25 social functioning, and we already know that

- 1 and that stuff is generic too, that crosscuts
- 2 diseases. And so I think you could put
- 3 together a tool, you and I could do it on the
- 4 back of a piece of paper like after the
- 5 meeting, we could just, you know, put down
- 6 those domains and those actually would probably
- 7 be pretty reasonable as a start from where we
- 8 are today, okay?
- 9 Now that said, I think it would be
- 10 useful to take a step back and go to the
- 11 population and really talk to people to see
- 12 what symptoms and things are really an issue to
- 13 them, and then we could go to Version 2.0. But
- 14 you know, I think we are ready now to measure
- 15 things that are meaningful to people and most
- 16 likely will detect signal.
- 17 DR. ROSS: Dr. Shah? Oh, I'm sorry.

- DR. SIDANA: Surbhi Sidana from Mayo
- 19 Clinic. Just as a comment to that, you know,
- 20 we are also using PRO-CTCAE, but the
- 21 challenges, there are 78 questions, and I had
- 22 to, based on my clinical judgment, pick which
- 23 20 of them. Now my colleagues who are using
- 24 PRO-CTCAE may pick another 20. And right now
- 25 my patients are filling out a questionnaire

- 1 which is taking them 45 minutes for 20
- 2 questions.
- 3 Are they all of the right questions?
- 4 I think that is where the prelim data comes in,
- 5 like which questions exactly, and we'll know
- 6 which questions are changing over time, talk to
- 7 patients who had CAR T, okay, what was
- 8 important to you, what symptoms did they have,
- 9 what is important, so I think we need that
- 10 data.
- And I think one thing which none of us
- 12 talked about is a lot of these people get
- 13 neurotoxicity, like about up to a third can get
- 14 that, we are testing questions for cognitive
- 15 function, did they recover cognitive function?

- 16 If they had neurotoxicity, did they still have
- 17 cognitive impairment at six months, 12 months,
- 18 I think that's important to address because it
- 19 may be subtle and we need to pick it up. Thank
- 20 you.
- 21 DR. CUYJET: Let me ask one other
- 22 question before you go. I haven't heard
- 23 anything -- you mentioned that people have to
- 24 come to certain centers because not everybody's
- 25 providing CAR T therapy. So if you're talking

- 1 a Medicare population on a fixed income, what
- 2 about ancillary considerations? How do people
- 3 factor in financial burdens, ancillary costs in
- 4 terms of their decision and how they're making
- 5 decisions to commit to a new therapy where the
- 6 outcomes may or may not be desirable? There
- 7 are considerable side effects to take into
- 8 consideration, and there's some economic
- 9 considerations that may impact the family
- 10 members or the members themselves. Is that
- 11 part of the assessment?
- DR. SIDANA: That's not part of our
- 13 assessment for this study. We are doing

- 14 another study where we are looking at people
- 15 enrolling in trials or not, and a lot of people
- 16 don't enroll in trials because coming back and
- 17 forth to a center is more money, it takes time,
- 18 somebody has to take time off from work. But I
- 19 think it's an important question to ask. We
- 20 are not collecting that information right now
- 21 but it is important, especially if you're going
- 22 to mandate someone collect questionnaires or
- 23 come back for follow-up to a referral center,
- 24 but who is paying for that, you know, who's
- 25 paying for the caregiver to take time off. I

- 1 think those are challenges and I think they
- 2 need to be addressed.
- 3 DR. ROSS: Dr. Kluetz, were you going
- 4 to stand up?
- 5 DR. KLUETZ: Hi, this is Paul Kluetz
- 6 from the FDA, and I just wanted to address a
- 7 couple things. The first was a little bit
- 8 about labels, you know, FDA labels versus
- 9 European labels and what's the threshold for
- 10 data regarding those two different ways of
- 11 communicating. Europe definitely has a

- 12 different threshold for what to put in their
- 13 labels and how to put it in, they have
- 14 different regulations, et cetera.
- For our labels, especially if you're
- 16 making a claim of treatment benefit saying our
- 17 drug reduces pain, our drug improves
- 18 health-related quality of life, it needs to be
- 19 statistically tested, substantial evidence, and
- 20 that's not frequently done, they're typically
- 21 not incorporated in the statistical hierarchy
- 22 and tested in that fashion. But we have many
- 23 examples of using descriptive PRO data in
- 24 labels to further describe a therapy, and so I
- 25 was just jotting down some of the more recent

- 1 examples.
- 2 For safety, which I think kind of is
- 3 interesting in this context, crizotinib, which
- 4 is a really important lung cancer therapy, was
- 5 known to cause ocular toxicities through normal
- 6 clinician report, and ocular toxicity is
- 7 somewhat unusual, so they wanted to get a
- 8 little more information about how that was
- 9 actually affecting patients so they did

- 10 incorporate a patient-reported outcome specific
- 11 to that and in the label it notes that yes,
- 12 there was a lot of ocular toxicity, but
- 13 patients did not feel that they were bothered
- 14 by it, and there were several other facets of
- 15 it that were from the patient that really gave,
- 16 I think, a lot more information about that
- 17 toxicity.
- There's several efficacy examples and
- 19 one where we added, did actually have a lot of
- 20 flexibility in what we would normally accept,
- 21 would be the Hemlibra label as far as
- 22 improvements in function and joint pain, and
- 23 that was, it was statistically tested but the
- 24 instrument had some flaws, so we do put this
- 25 data in labels.

- 1 I would say on the other question,
- 2 which is what should we do if we could tailor
- 3 something right now, I agree with Dr. Basch, I
- 4 think physical function is a very, as I
- 5 mentioned, disease-agnostic type of measure
- 6 that's going to be pretty applicable. There is
- 7 some finesse in there because you do want to

- 8 make sure you have, you're where you need to be
- 9 in your scale because if your baseline function
- 10 is very high, like in the female adjuvant
- 11 breast cancer trial where you have young women
- 12 that are actually functioning very well, you
- 13 might want to add a couple higher functioning
- 14 items on there to capture that level. So
- 15 there's some finessing, but I think physical
- 16 function is important.
- 17 I do think wearable devices in
- 18 addition to PRO in that physical function
- 19 domain is going to probably be something that's
- 20 going to be very valuable in the future as
- 21 well.
- Then finally for the value of
- 23 symptomatic adverse event reporting by
- 24 patients, one of the things that we're looking
- 25 at that I think is going to help, especially in

- 1 single-armed clinical trials, is we have a very
- 2 hard time understanding what's actually disease
- 3 and what's actually treatment-related side
- 4 effects. And the way FDA does it currently is
- 5 we don't look at the attribution that the

- 6 physician gives to the AE, we just assume it's
- 7 due to the drug because we don't really know
- 8 how else to do it. So you'll see in phase one
- 9 trials and early accelerated approvals like 80
- 10 percent fatigue, very high levels of fatigue
- 11 which, you know, is probably, some was there at
- 12 baseline. What you will do with these PROs is
- 13 that you will get a baseline measure, and then
- 14 it will be systematically assessed, and so you
- 15 can take baseline into consideration. We're
- 16 looking at ways to say we're not going to call
- 17 it a drug-related adverse event unless it goes
- 18 above what it was at baseline, and I think Amy
- 19 Ludek from Mayo has done some work in that, so
- 20 we're exploring that, we think that could be
- 21 valuable to sort of cut through some of the fog
- 22 that we see in these single-arm trials where
- 23 you really want to talk to your patient about
- 24 what they might experience. You know, it looks
- 25 relatively significant if there's high levels

- 1 of symptomatic side effects that may or may not
- 2 be attributed to the drug.
- 3 MR. FRANKEL: Can I just follow-up on

- 4 that point? One of the things you mentioned on
- 5 a slide, you categorized besides the
- 6 patient-reported outcomes, you had, I think you
- 7 called it observational reported outcomes, and
- 8 you noted that that may be both from the
- 9 caregiver, for example?
- DR. KLUETZ: Yeah.
- MR. FRANKEL: Do you really view that
- 12 as being two separate measurements? Because I
- 13 imagine, certainly with a pediatric population,
- 14 and we're discussing an elderly population that
- 15 is very ill and is undergoing this therapy.
- 16 They're typically going to be accompanied by a
- 17 caregiver, loved one, their spouse perhaps, who
- 18 will be able to provide insight for a PRO that
- 19 they may not be able to do on their own, so it
- 20 would seem to be inherently part of a
- 21 patient-reported outcome rather than a separate
- 22 category. Am I correct with that?
- DR. KLUETZ: Yes. It's a subtle
- 24 point. I think what you might be referring to
- 25 is what we call proxy reporting, where it's

1 someone other than the patient filling in the

- 2 same questionnaire that the patient was
- 3 supposed to fill in. We don't actually, FDA is
- 4 not a fan of that, our outcomes assessment
- 5 staff doesn't like that. Rather, for infants
- 6 or those who are faced with a brain tumor or
- 7 major dementia that is unlikely that they're
- 8 going to be able to fill out the form
- 9 themselves, they would look for observable
- 10 signs that the care provider can record. And
- 11 that's a little different because you don't get
- 12 that non-observable nausea type of pain thing
- 13 that you can actually observe. So in those
- 14 cases you get diarrhea, you get activity levels
- 15 for kids, and so that's kind of the way we look
- 16 at it, observational-reported outcomes need to
- 17 be observable signs.
- MR. FRANKEL: And how do you tease out
- 19 things like financial toxicity as it's phrased,
- 20 or general anxiety because they're grappling
- 21 with a serious illness, versus that being
- 22 specific to the therapy involved?
- DR. KLUETZ: Yeah. I tried to make it
- 24 clear that there's no perfect way to tease that
- 25 out completely. Symptoms are probably the

- 1 closest to the drug effect, as I said, and even
- 2 within symptoms, teasing out whether it's a
- 3 drug-related symptom or a disease symptom, or
- 4 even a symptom of a comorbidity is unclear.
- 5 Now that one thing that we tend to do is to
- 6 hold PRO to a higher standard than we do any
- 7 other clinical trial measure. We know that
- 8 CTCAE also suffers from the same challenge, so
- 9 yes, I think teasing that out is a challenge.
- MR. FRANKEL: How much do you think
- 11 that biases the actual measurement?
- DR. KLUETZ: Which part of the bias?
- MR. FRANKEL: Well, in the sense that
- 14 there can be an increased, let's say whatever
- 15 they're specifically measuring, let's say
- 16 anxiety, and you can say whether it's related
- 17 to the drug. Do you use a baseline comparative
- 18 to other patient populations to be able to say
- 19 well, this is something that we see
- 20 consistently with other therapies in patients
- 21 who are undergoing therapies for serious
- 22 illness, and we can actually deduct that from
- 23 our overall evaluation, this is actually set
- 24 aside from that benchmark?
- DR. KLUETZ: It's one of the reasons

- 1 why we don't typically label things like
- 2 anxiety in a cancer trial. It may be obviously
- 3 where, you know, anxiety is the actual disease,
- 4 but there's so many non-drug influences to
- 5 anxiety, sleep, for instance, because there are
- 6 so many nondrug influences. Financial toxicity
- 7 we don't look at at all, because drugs aren't
- 8 even being paid for in the clinical trial. So
- 9 some of those concepts that you're referring to
- 10 are used a lot in NIH trials or in
- 11 postmarketing trials to understand the patient
- 12 experience once the drugs are marketed, but for
- 13 our premarket, those we look at a little bit
- less, and focus more on the disease
- 15 treatment-related symptoms.
- DR. ROSS: Dr. Gottschalk?
- 17 DR. GOTTSCHALK: I have one question.
- 18 Right now we're looking in the CD-19 space,
- 19 we're probably going to measure a lot of
- 20 outcomes which are confounded by the treatments
- 21 where the patients have already been treated,
- 22 so what is the value of getting PROs in the
- 23 setting right now when we will hopefully move
- 24 these therapies more in the outcome setting,

- 1 or instead of an allotransplant for children.
- 2 And so I was wondering, you know, Dr. Basch or
- 3 Dr. Kluetz, how do you adjust for that?
- 4 DR. BASCH: Well, I would just say in
- 5 response to your question, and also your prior
- 6 question, that --
- 7 MS. JENSEN: Can you identify
- 8 yourself?
- 9 DR. BASCH: I'm sorry, Ethan Basch,
- 10 sorry. You know, many of these PRO tools have
- 11 been evaluated in populations with advanced
- 12 disease who are highly symptomatic, heavily
- 13 pretreated, with multiple comorbidities, and
- 14 have been able to delineate very clearly
- 15 between arms when there's, you know, when
- 16 there's no real effect there. And so there are
- 17 many examples of, despite the challenges that
- 18 you allude to, where these tools perform
- 19 extremely well, and that's because some
- 20 therapies really improve the way people feel
- 21 and some therapies really worsen the way that
- 22 people feel and you know, many therapies do a

- 23 little bit of both in different ways, and these
- 24 tools are able to detect that. So I would
- 25 argue that in an advanced population or in a

- 1 heavily pretreated population, it's perfectly
- 2 appropriate to use these tools. In fact, those
- 3 are the settings in which these tools are most
- 4 commonly used.
- 5 Now that said, I think yes, you might
- 6 get a crisper signal in an adjuvant setting or
- 7 in a healthy population as you move therapies,
- 8 you know, more up front, but I don't think that
- 9 that's a reason not to use it later on. In
- 10 addition, you know, you can collect a lot of
- 11 information that's hypothesis generating for
- 12 earlier.
- DR. GOTTSCHALK: I think that was not
- 14 my question. The question was, you know, side
- 15 effect profile will be probably different. You
- 16 know, for example, giving therapy in a patient
- 17 who has a history, there is probably more
- 18 expansion, more neurotoxicity, et cetera. So
- 19 then if you have a very validated PRO set of
- 20 data but you haven't measured every

- 21 pretreatment therapy with CAR T, and so then
- 22 the question is how does this data look like
- 23 when the patients are not so heavily
- 24 pretreated?
- DR. BASCH: Do you want to take that?

- 1 All right.
- 2 DR. GO: Will Go from Kite. So, I
- 3 totally agree with you. I mean, this is where
- 4 the, I think a challenge that we're all facing
- 5 across industry as well as our academic
- 6 partners and patient standpoint, you're exactly
- 7 right. Let's just take CD-19 as an example,
- 8 right? In our trial, in the pivotal trial and
- 9 effectively third, fourth, fifth-line patients,
- 10 two-thirds of them already had B-cell aplasia
- 11 because they had so much prior rituximab. And
- 12 as we are, you know, continuing to look at the
- 13 B-cell aplasia, which is one of the long-term
- 14 questionable side effects, about what that
- 15 means for patients, how is that going to go
- 16 over time? You're exactly right.
- 17 As we get to earlier lines of therapy,
- 18 potentially we might see fitter T-cells, fitter

- 19 patients, and that's why, again, I defer to
- 20 ZUMA-7, because why? That's a second line
- 21 therapy with a randomized controlled trial
- 22 where we are going to be looking at that with
- 23 some classic PRO measurements.
- DR. ROSS: Can I -- I wanted to ask a
- 25 question, and I think Dr. Shah is one of the

- 1 people who actually raised their hands. So,
- 2 we've heard a bit about how, you know, this
- 3 therapy is so effective, kind of like why do we
- 4 need PROs. We also heard among the comments
- 5 from the panel that the PRO should only be used
- 6 as part of randomized controlled trials. I was
- 7 hoping that some of the clinicians who've used
- 8 PROs in practice, not research, could talk to
- 9 some of the, not just the challenges which we
- 10 heard more about, but the successes of how
- 11 they've been used and how they've informed
- 12 clinical decision-making.
- DR. SHAH: Gunjan Shah from Memorial
- 14 Sloan Kettering. So, I think that while I can
- 15 fully understand your questions of sort of
- 16 timing and duration of looking at these PROs,

- 17 that specifically to what we can do with them
- 18 even now is, we expect even if we continue to
- 19 use them in these later line settings with
- 20 several lines of therapy, that there will be
- 21 several iterations of these CAR T-cells, and we
- 22 expect that future ones will be better than the
- 23 ones now.
- And one of the things that we've been
- 25 doing with the autologous transplant as part of

- 1 looking at all of this is, essentially you have
- 2 a therapy that's safe enough that what you're
- 3 really researching is how to decrease the
- 4 symptom burden and how are you actually making
- 5 a difference, that these are your primary
- 6 outcomes, you know, it's safe to give, it's
- 7 effective, we know that this works, but how do
- 8 you make it better for the patients, how do you
- 9 make them not need to be in the hospital or not
- 10 be in the ICU, that kind of thing.
- So some of these measures are really
- 12 for that, and so I think that partly to answer
- 13 your question, having these at the baseline of
- 14 sort of the first generations of these drugs

- 15 being used commercially and, you know, on
- 16 trials, it's helpful to then sort of inform the
- 17 studies of the future.
- In the autologous transplant setting,
- 19 you know, one of the studies and one of the
- 20 only studies that's really shown to make a
- 21 difference has been an acupuncture study that
- 22 we did with our integrated medicine colleagues
- 23 at MSK, and were able to show a difference in
- 24 their patient-reported outcomes as a primary,
- 25 of decreasing fatigue and changing their

- 1 symptom burden, and so I think that having this
- 2 information is valuable over time.
- 3 DR. KLUETZ: May I?
- 4 DR. ROSS: Yes.
- 5 DR. KLUETZ: Paul Kluetz. Just one
- 6 comment about late stage versus early stage.
- 7 You know, most of our single-armed trials are
- 8 multiply refractory, our dose finding trials
- 9 particularly, and there's actually been some
- 10 interest in using sort of side effect bother
- 11 and side effect PRO to help better find dose,
- 12 so that's one possible, actually a pretty good

- 13 utility for that.
- And I'd also argue that it's still
- 15 important to measure safety and it's very
- 16 important to measure safety in that setting.
- 17 For instance, we know that in second and third
- 18 line multiply chemo-treated patients, we're
- 19 going to see a lot more neutropenia with
- 20 another cytotoxic agent. And so I think we'll
- 21 see, it's important to understand that toxicity
- 22 profile and I think, I look at it as
- 23 complementary to how we're looking at safety as
- 24 well.
- With things like health-related

- 1 quality of life and physical function, I may
- 2 have to agree with you that maybe that's not
- 3 the right spot for those more broad net benefit
- 4 kinds of questions, but for safety, I think
- 5 it's actually a pretty important use.
- 6 DR. BASCH: Ethan Basch. I'll just
- 7 comment briefly on the real world use of PROs.
- 8 So, our group and others have done many
- 9 registries. We currently have a large national
- 10 U.S. trial, or study I should say, real world

- 11 study supported by PCORI, in which patients
- 12 receiving systemic cancer treatment for
- 13 advanced disease at 50 community practices
- 14 around the U.S. are self-reporting their own
- 15 patient-reported outcomes on a weekly basis
- 16 throughout their entire treatment trajectory.
- 17 The compliance rate is 96 percent, meaning that
- 18 if you look at the average proportion of
- 19 patients who self-report every, at any given
- 20 week, it's 96 percent. 80 percent of those are
- 21 self-reporting on their own, and the additional
- 22 15 or 16 percent, they actually get recovered
- 23 by somebody calling them if they don't
- 24 self-report, so it's augmented by having a
- 25 central person in addition to collect the

- 1 information.
- 2 I would also mention, there's been
- 3 some questions about informative missingness
- 4 when patients are hospitalized or have severe
- 5 toxicities, and in those settings we do use
- 6 proxy reporting, so we will use a caregiver or
- 7 clinician who will provide the information and
- 8 that's generally used in sensitivity analyses,

- 9 so that we understand the reason for the
- 10 missingness, but again the missingness is
- 11 extremely low, and these are patients with
- 12 advanced disease, often close to death.
- DR. ROSS: Dr. Perissinotto, and then
- 14 Dr. Goss.
- DR. PERISSINOTTO: So, one, I
- 16 appreciate Dr. Sidana for mentioning the
- 17 potential cognitive side effects that happen to
- 18 be particularly important to our Medicare
- 19 beneficiaries. So my question is for Dr. Go
- 20 and any of the panel members in terms of the
- 21 trials with the reported neurotoxicities if we
- 22 know the extent of the variability of the
- 23 toxicities, if there is any cognitive
- 24 assessments that were done at baseline or the
- 25 follow-up, and what the long-term sequelae are.

- 1 DR. GO: Will Go from Kite. I'll
- 2 comment first and then I'm going to ask our FDA
- 3 colleague to comment as well. I think it's
- 4 very challenging in terms of neurocognitive
- 5 behavioral testing. What we did in ZUMA-1, the
- 6 pivotal trial, we incorporated a mini-mental

- 7 status exam, which is not obviously a great
- 8 office tool. We chose that because in previous
- 9 FDA-approved products like blinatumomab from
- 10 Amgen, they also used it as well, so that is
- 11 what I would say is a very blunt tool to look
- 12 at that. Obviously, we are exploring
- 13 possibilities of other more complex
- 14 neurocognitive testing, but this, I agree with
- 15 everyone here that as CAR T's go to other
- 16 disease states, different lines of therapies,
- 17 that this will be something that I think we
- 18 would want to as a community to continue to
- 19 support, and we at Kite Gilead will definitely
- 20 keep supporting it.
- DR. KLUETZ: Paul Kluetz with the FDA,
- 22 and I think it's an excellent question because
- 23 I think it's, I like these targeted questions
- 24 that are getting at things that we know that
- 25 are happening, can we further describe and

- 1 characterize the effect. Cognitive testing
- 2 using a, is a clinical outcome.
- 3 Patient-reported outcomes are obviously
- 4 challenged. If you're cognitively impaired,

- 5 filling things out can be challenging, although
- 6 there are some cognitive scales.
- 7 There is interest in, again, looking
- 8 at technology, so are there different types of
- 9 gaming types of situations where you have
- 10 certain kinds of, almost a performance outcome
- 11 where you're filling in certain things on an
- 12 iPad, and there are some interesting things
- 13 that are coming out with that, but they're, we
- 14 haven't seen that arrive at the Agency.
- DR. PERISSINOTTO: Thank you.
- 16 (Pause.)
- 17 DR. ROSS: Dr. Goss, and then
- 18 Dr. Lamon.
- 19 DR. GOSS: I had a couple of
- 20 questions. Dr. Basch, I appreciated your
- 21 presentation because it was really very
- 22 helpful. There were a couple of other -- there
- 23 was a question that I just wanted to clarify.
- 24 The way our question is asked, it's not asked
- 25 specifically about CAR T at this point, it's

- 1 just PRO, and in one of your conclusions you
- 2 made comment about the utility for CAR T, and I

- 3 just wanted to make sure that I'm understanding
- 4 the question correctly, number one, and number
- 5 two, to know if that would change how you're
- 6 thinking about the issue of PROs if it were
- 7 specific to CAR T.
- 8 And I also had a question about, kind
- 9 of pragmatic, so our question two has to do
- 10 with, you know, transferable to community
- 11 practice and, you know, quick throughput to a
- 12 trial setting, and I was trying to go through
- 13 the data that I had available. With the
- 14 exception of the presentation on the FACT,
- 15 which wasn't one of the measures we're looking
- 16 at, in none of them did anyone report what was
- 17 a minimally important clinical difference. And
- 18 so I would be interested in our general
- 19 assessment of the experts out there about in
- 20 which of these measures do we have kind of a
- 21 defined clinically important difference that we
- 22 could use as a benchmark.
- And also, there was some lack of
- 24 information about the cost of licensing, for
- 25 example. So, EORTC I think has a licensing

- 1 arrangement, you know, and as mentioned, it's a
- 2 strongly validated measure, I would agree, but
- 3 I'm just curious if anybody has any details on
- 4 those types of practical implementation
- 5 limitations, because I think that may be
- 6 relevant to how we think about this.
- 7 DR. BASCH: We did --
- 8 DR. ROSS: Dr. Basch, please --
- 9 DR. BASCH: I'm sorry, my apologies.
- 10 Ethan Basch from University of North Carolina.
- 11 Yeah, so we did report on which tools were used
- 12 in CAR T trials really just as a matter of
- 13 information, but the basis for particular use
- 14 in community practice or how widely we use the
- 15 tools for generalizability came from use in the
- 16 Medicare-aged population, and I did show that
- 17 as a separate item for each individual tool,
- 18 and that was the basis of that, not the use in
- 19 CAR T.
- DR. GOSS: Okay. Any thoughts on the
- 21 minimally important clinical differences, and
- 22 whether or not there are any of them that have
- 23 really well-established guidelines or some that
- 24 you feel that may be missing as well?
- DR. BASCH: Well, I and some others

- 1 can comment on this as well. So, you know, in
- 2 FDA lingo, this has been sort of changed to
- 3 view a score that represents a meaningful
- 4 change, so for all of the tools that we gave a
- 5 smiley face to, there have been evaluations of
- 6 what is a clinically meaningful score change,
- 7 with the caveat that the PRO-CTCAE is, you
- 8 know, about adverse event reporting that's
- 9 generally descriptive rather than, you know,
- 10 comparison of proportions, hitting a certain
- 11 score threshold.
- DR. ROSS: All right, so I know there
- 13 are a number of questions here. Dr. Lamon was
- 14 next, and let's just try to keep the questions
- 15 as short as we can so we have enough time.
- DR. LAMON: I have a question for
- 17 Dr. Snyder and anyone else who wants to answer.
- 18 I really liked the graphic presentations you
- 19 did on the issues of getting clinician
- 20 engagement, but I'm thinking about all the
- 21 technological issues, and my impression is that
- 22 the ability to do the PRO measurements is
- 23 technology and that we have more information
- 24 systems. How are you getting the information
- 25 on those graphs, are they in real time, and

- 1 what's the interface with the electronic record
- 2 that you're using at Hopkins, or any other
- 3 records if anyone else wants to comment? I
- 4 think that's limiting clinician involvement and
- 5 putting a wedge between collecting data and
- 6 using it, and do we have it in real time to use
- 7 it in real time?
- 8 DR. SNYDER: Claire Snyder from Johns
- 9 Hopkins, thank you for the question. For the
- 10 purposes of our research we made up the data so
- 11 it was really easy to get.
- 12 (Laughter.)
- However, the rationale behind the
- 14 research was work that our group had done at
- 15 Johns Hopkins and my colleague Michael Brundage
- 16 had done in terms of clinical trial data where
- 17 we wanted to show the data to patients and
- 18 clinicians and we didn't know the best way to
- 19 convey all the information we wanted to, how is
- 20 the patient doing over time, what's an
- 21 important difference, what is statistically
- 22 significant, what does the doctor need to pay
- 23 attention to? They're not going to learn all

- 24 about these questionnaires, we need to make
- 25 them immediately interpretable and intuitive.

- 1 So, the reason that we had to do the
- 2 research that we did is that there is a huge
- 3 increase in the collection and use of these
- 4 data in clinical practice, so our team at
- 5 Hopkins started doing this in 2005. I would
- 6 say we were some of the pioneers in the U.S., I
- 7 feel like we are now almost obsolete, but the
- 8 work done by Ethan Basch and others has moved
- 9 this so far forward where he is, for example,
- 10 doing this study in 50 community practices.
- 11 A colleague of ours, Roxanne Jensen,
- 12 who's now at the National Cancer Institute, did
- 13 a review of e-PRO systems in 2014 and even then
- 14 in cancer care alone, there were 33 unique
- 15 systems meant for clinical practice. The big
- 16 challenge now is getting the data in the
- 17 electronic health record. With funding from
- 18 PCORI, a group of us, including some folks
- 19 here, developed a users guide for how to
- 20 integrate patient-reported outcomes into
- 21 electronic health records. It is freely

- 22 available on the PCORI website and it walks
- 23 step by step through all the considerations
- 24 involved. It does not provide one right answer
- 25 but a range of options and their relative

- 1 advantages and disadvantages. So I think
- 2 increasingly, there are tools that are going to
- 3 get us there. Thank you for the question.
- 4 DR. ROSS: Dr. Shah, do you have a
- 5 quick response?
- 6 DR. SHAH: Yes, just very quickly,
- 7 Gunjan Shah from Memorial Sloan Kettering. So,
- 8 I briefly was able to show you some of the
- 9 figures from our MSK Engage platform that's
- 10 being created and sort of in use on the surgery
- 11 side and being transferred into a more
- 12 long-term use for the transplant and cell
- 13 therapy side. And you know what, the way it's
- 14 working right now and what we're hoping to
- 15 continue is that you can actually pull it up in
- 16 the office, that you can pull up an individual
- 17 patient and show that patient, here's what
- 18 you've reported over time, and with one click
- 19 you can actually decide to include that in

- 20 their electronic record, and so that it can be,
- 21 you know, part of their record over time, but
- 22 also pulled up in sort of a dynamic fashion to
- 23 intervene on if you so choose to, but also see,
- 24 you know, which things are higher at which
- 25 visit, which ones are worse today, which are

- 1 better today, and look over time.
- We on the clinician side can then also
- 3 say here's your entire panel of patients with
- 4 the same disease, or answered the same survey,
- 5 and then have more aggregate data also built in
- 6 to be able to look at.
- And so I think it's kind of important
- 8 to be both ways, sort of aggregated across the
- 9 population, but also to include the patient in
- 10 showing them what they reported along the way
- 11 also.
- DR. ROSS: Thank you. Dr. James,
- 13 you've had your hand up the longest.
- DR. JAMES: All my questions have been
- 15 answered by the last two.
- DR. ROSS: Great. Dr. Feinglass?
- 17 DR. FEINGLASS: For our FDA colleague,

- 18 Dr. Kluetz, how often does the result from a
- 19 PRO assessment tool become a deciding factor
- 20 for a binding FDA decision?
- 21 DR. KLUETZ: Thank you for that
- 22 softball, this is Paul Kluetz.
- DR. FEINGLASS: You're welcome.
- DR. KLUETZ: Paul Kluetz from the FDA.
- 25 So, I think it's a really important question,

- 1 it's something I talked about over lunch and
- 2 that is, are we using patient-reported outcomes
- 3 to further characterize how a therapy affects
- 4 the patient in the totality of data, and then
- 5 we organize that in a qualitative or a
- 6 quantitative risk-benefit determination, which
- 7 is what we do at FDA, mostly qualitative right
- 8 now, yes, we do that all the time.
- 9 We wrote a recent New England Journal
- 10 of Medicine article on the use of
- 11 metastasis-free survival, which is a new
- 12 endpoint for nonmetastatic castration resistant
- 13 prostate cancer so it was a novel endpoint, and
- 14 in this particular case patients normally don't
- 15 get a therapy and they're usually asymptomatic,

- 16 and so it was like sort of a maintenance
- 17 therapy question so we were really quite
- 18 concerned about the tolerability, this was an
- 19 important part of our decision, because we knew
- 20 that the benefit was there, that it was pushing
- 21 back metastatic disease, but how tolerable was
- 22 it? And so in that case we did use, looked
- 23 very carefully at this overall side effect
- 24 bother question and different side effects, and
- 25 made sure there was no significant signal there

- 1 in addition to the normal CTCAE data, and so
- 2 that weighed in.
- 3 I think the bigger question is, have
- 4 we ever used it for a negative nonbinding
- 5 decision, and I think that's obviously what
- 6 everyone is really concerned about, and that's
- 7 not to my knowledge. We've used it for
- 8 positive, important positive decisions. For
- 9 instance, Jakafi, as I said, it was a key
- 10 secondary endpoint that moved the regulatory
- 11 decision from an accelerated approval because
- 12 it was a surrogate endpoint as a primary
- 13 endpoint, to a regular approval because the

- 14 secondary endpoint was a symptom improvement, a
- 15 clinical benefit that was meaningful to
- 16 patients.
- 17 DR. ROSS: Dr. Civic, I think you were
- 18 next.
- 19 DR. CIVIC: Yeah. One of the
- 20 questions we're asked is how long to measure,
- 21 sorry, a PRO, to be able to identify a valid
- 22 treatment effect and, you know, we're looking
- 23 at late toxicity but also, I think it was
- 24 Dr. Abikoff talked about late benefits, that
- 25 there wasn't a response until, in some patients

- 1 until nine to 12 months, which makes it seem
- 2 like we should be measuring PROs for at least
- 3 12 months. Does anyone want to comment?
- 4 DR. GO: Will Go from Kite. So yeah,
- 5 similar to other trials and in our pivotal
- 6 trials, number one, we've actually seen that
- 7 with a single dose of CAR T, as well as at the
- 8 NCI, and we'll hear Dr. Yang comment as well,
- 9 that we've seen conversions from stable disease
- 10 to PR to complete remission as late as over 12
- 11 months, and this is why -- and without any

- 12 other intervening therapy. And so this is why,
- 13 and again, I am not a PRO expert, I'm a
- 14 hematology oncologist, but if I were to design
- 15 the PROs, again, that's where the challenge
- 16 lies, because you're going to start seeing
- 17 potentially late converters as far as 12 to 15
- 18 months.
- 19 DR. ABIKOFF: Cori Abikoff from
- 20 Novartis. I agree, it was my point that we do
- 21 see these patients progress over time and that
- 22 is one of the things that differentiates CAR T
- 23 therapy from other therapies, and I also am not
- 24 an expert in PROs, but I think that this along
- 25 with the questions that have been raised about

- 1 things like neurologic toxicity, these are
- 2 still fairly young technologies and they've
- 3 been studied for a fairly short period of time,
- 4 so understanding what those late effects are
- 5 and how that impacts PRO measurement as well as
- 6 understanding the immediate effects and how
- 7 that affects PRO regimen, are still things that
- 8 we're trying to understand, and why we are
- 9 actively utilizing them in our current and

- 10 future clinical trials, because they will help
- 11 us to answer those questions.
- DR. BAR: Meray Bar from the Fred
- 13 Hutch. Regarding the long-term follow-up for
- 14 PROs, I think there is two sides of it. One is
- 15 the one that patients might respond later but
- 16 on the other hand, there is still relapsed
- 17 disease or progression of disease after and a
- 18 lot of patients that we are looking at receive
- 19 subsequent therapies that may also affect how
- 20 they feel, their quality of life, and symptoms.
- 21 So there are two groups of patients that, one
- 22 may respond later, but on the other hand there
- 23 still are patients who will have progressive
- 24 disease and relapse after, either because of
- 25 interim therapy, they have symptoms of disease

- 1 progression or because of subsequent therapies,
- 2 so these two things need to be taken into
- 3 consideration as well.
- 4 DR. ROSS: Okay. Dr. Garrido, I think
- 5 you had your hand up next.
- 6 DR. GARRIDO: So, from Dr. Snyder's
- 7 presentation, we saw that individuals,

- 8 including clinicians and researchers with quite
- 9 substantial education aren't so great at
- 10 reading graphs and interpreting changes in
- 11 PROs. So I'm wondering, either in your own
- 12 personal experience in working with patients
- 13 with limited literacy or education, are people
- 14 able to understand just the questions
- 15 themselves, not even the changes, or have these
- 16 been evaluated in people of limited literacy or
- 17 education?
- 18 DR. SIDANA: Surbhi Sidana, Mayo
- 19 Clinic. While I don't have the exact answer
- 20 you are asking, you know, I had a patient who
- 21 was filling out a similar questionnaire in our
- 22 study. He did not have neurotoxicity but his
- 23 heart rate was fast, but he had not slept
- 24 because of all the alarms going off in the ICU,
- 25 and that patient had to read a question three

- 1 times on that questionnaire to understand. Now
- 2 I don't know what to do with that answer, do I
- 3 even trust the answers the patient gave? So
- 4 yes, I mean, those are challenges, not only of
- 5 patients understanding questions, but even

- 6 well-educated patients who are having side
- 7 effects of treatment, you know, being able to
- 8 answer them in the state that they're in.
- 9 The one more point I would like to
- 10 make from before is, I think it's important to
- 11 study late effects because as you know, for
- 12 allogeneic transplant, we found out, you know,
- 13 there are late effects like chronic graft
- 14 versus host disease that impact quality of
- 15 life. Now we don't know any about CAR T yet,
- 16 but who knows what's going to happen when these
- 17 people are like three years out, four years
- 18 out? So I think it's important to study them,
- 19 we just don't know what they are right now.
- DR. PERISSINOTTO: Can I just add to
- 21 the question about low literacy also? Because
- 22 I think you'll be able to answer this if some
- 23 of the PRO measures have looked at multilingual
- 24 and multiethnic populations.
- DR. BASCH: Yeah, absolutely, so --

- 1 thank you, Dr. Snyder. I'm Dr. Basch, Ethan
- 2 Basch, and yeah, I need to get like a sticker
- 3 on me or something to me as a reminder, which

- 4 speaks well to your question, right, I need to
- 5 be prompted.
- 6 So, a couple things. First, you know,
- 7 in looking at Claire's evidence, which I think
- 8 is, you know, terrific studies about
- 9 interpretation of the graphic, you know, we
- 10 haven't applied that level of scrutiny to
- 11 clinicians, for example, in interpreting
- 12 waterfall plots or Kaplan-Meier curves, or all
- 13 the different graphics that we are expected to
- 14 interpret in journal articles or in drug
- 15 labels, right? So I mean, people have trouble
- 16 digesting data. You know, I told Claire that
- 17 personally I like the USA Today, I like a
- 18 simple graphic, like I can get that, so I think
- 19 there's something to simplicity in
- 20 understanding graphical displays. But I think
- 21 that, you know, as Paul alluded to, we
- 22 sometimes apply a greater level of scrutiny to
- 23 these patient measures than we do to the
- 24 metrics that we all take for granted every day,
- 25 and I just want to caution us not to be, not to

1 apply a higher level of scrutiny.

- 2 Regarding your question, so there have
- 3 been many many PRO studies done in patients
- 4 with low education levels, low health literacy
- 5 levels. In a study that my group conducted
- 6 that was reported last year at ASCO and in
- 7 JAMA, we had a very large arm of patients who
- 8 had never used a computer before and they were
- 9 using a computer and they, that population had
- 10 low literacy and almost universally had less
- 11 than high school education, and they were
- 12 universally almost able to self-report, and
- 13 actually that group saw greater benefits from
- 14 reporting PROs and having information conveyed
- 15 to the clinicians for management of
- 16 symptomatology.
- 17 So I mean, as far as language, there
- 18 have also been many studies done in groups
- 19 speaking other languages. I'd say all of the
- 20 tools with the smiley faces have been
- 21 linguistically adapted into other languages
- 22 using a pretty, I'd say a pretty rigorous
- 23 translation process that often involves both
- 24 cognitive interviews of people and if done
- 25 well, includes people with different levels of

- 1 literacy and education as well, so I think for
- 2 the good tools, it's generally pretty good.
- 3 MR. FRANKEL: A quick follow-up to
- 4 that. Do you regularly, I assume this may have
- 5 come up when you evaluate these tools, to ask
- 6 the patient how burdensome they find the tool
- 7 that they're answering? So, is that every
- 8 single tool you have that question and you have
- 9 the data from there to be able to say well,
- 10 this tool, we have a very negative response and
- 11 this one -- and I assume that would be true
- 12 for, as the patient progresses through
- 13 treatment they may have different responses to
- 14 that as time goes on, and what do you see with
- 15 those terms?
- DR. BASCH: So, I'm sorry, maybe you
- 17 can restate that; what it the thing you're
- 18 interested in knowing?
- MR. FRANKEL: The patients' feedback
- 20 of how burdensome they find the tool that
- 21 you're actually using to measure their
- 22 feedback.
- DR. BASCH: Yeah. So we've done a lot
- 24 of that, others have, I think Claire has too,
- 25 so we've done a lot of work with how burdensome

- 1 people find questionnaires. You know, there
- 2 are a few people who find these questionnaires
- 3 to be burdensome, but just like they find going
- 4 to get their CAT scan burdensome, and their
- 5 liver biopsy burdensome, you know, not that a
- 6 PRO instrument is similar to a liver biopsy,
- 7 but part of the things people do as a part of
- 8 trials or care is burdensome, but may have
- 9 value.
- The vast majority of patients are very
- 11 enthusiastic. In multiple surveys that we've
- 12 done, on average, about 94 percent of people
- 13 say they'd recommend doing this to others,
- 14 they'd do it again, they find it highly
- 15 valuable, it improves communication with the
- 16 care team, they feel that they're an active
- 17 participant in care, an active participant in
- 18 the clinical trial enterprise, and people feel
- 19 engaged, people like doing this. I'd say that
- 20 in some of the settings where we do studies
- 21 where we ask people the same questions week
- 22 after week after week, you know, there are
- 23 people who push back, like couldn't you come up
- 24 with a few new questions or like, you know, I

- 1 you keep asking me about fatigue? And this is
- 2 where we're starting to use technologies to try
- 3 to make things a little more user friendly, but
- 4 in general people don't find these things
- 5 burdensome at all, in fact quite the opposite.
- 6 You know, most people are delighted to be, you
- 7 know, a part of what we're doing.
- 8 DR. ROSS: Dr. Flynn.
- 9 DR. FLYNN: Yes, Kathryn Flynn from
- 10 Medical College of Wisconsin and CIBMTR chair.
- 11 Just one additional point. I can't speak for
- 12 all of the measures, all seven measures, but
- 13 certainly for the PROMIS measures, one of the
- 14 stated goals in developing those was to
- 15 evaluate every single item in people with low
- 16 literacy, so every item at a minimum had at
- 17 least two people with less than a ninth-grade
- 18 reading level evaluate the item through a
- 19 cognitive interview, I think the PRO-CTCAE also
- 20 had cognitive interviews specifically targeted
- 21 to people with low literacy, so for those
- 22 meticulously developed measures, I think you

- 23 can have confidence that most people will
- 24 understand them.
- With those modular approaches, of

- 1 course, that's where, you know, taking into
- 2 consideration how many different domains, how
- 3 many different questions you're choosing, and
- 4 testing that again to make sure in that
- 5 particular patient population, you're not
- 6 asking something that people can't complete.
- 7 But then another question you had
- 8 asked earlier about licensing fees, also, both
- 9 PROMIS and PRO-CTCAE do not have licensing fees
- 10 associated with them, so that's not a burden.
- DR. CHUNG: Hi, Karen Chung from Juno
- 12 Celgene. Just addressing, again, the literacy
- 13 levels in most of these instruments, the four
- 14 of the seven that would, you know, move
- 15 forward, they are built to be at a fifth grade,
- 16 you know, kind of education level, so
- 17 hopefully, you know, we're trying to take care
- 18 of the literacy by making sure that the
- 19 language is really understandable.
- With regard to understanding the

- 21 outcomes, you know, some of the analyses we
- 22 really try to do so it's understandable to
- 23 clinicians as well as patients include
- 24 responder analyses so they know, well, this is
- 25 the proportion of the patients in the clinical

- 1 trial who had a clinically meaningful
- 2 improvement or, you know, worsening, or
- 3 stabilized. So those are the kind of metrics
- 4 we feel, you know, help them really understand
- 5 the outcomes more than kind of what is the mean
- 6 change from baseline, you know, and the other
- 7 kind of, you know, modeling that we do on the
- 8 PRO data.
- 9 So it's all trying to be, you know,
- 10 very concrete in the level of change and
- 11 filling out the difference between responder or
- 12 minimally important difference, and a lot of
- 13 people have done different analyses around
- 14 that. You know, there's anchor-based,
- 15 distribution-based, and for the EORTC-QLQ-C30
- 16 we felt very comfortable using that because
- 17 there have been solid MID research done out
- 18 there by (inaudible) and so that's what we're

- 19 using to identify our responders.
- DR. ROSS: Dr. Cheng, you had a
- 21 question earlier?
- DR. CHENG: Yes. Go ahead.
- DR. FERRUSI: Sorry for the delay. I
- 24 saw a nice lineup of people and I thought I
- 25 would wait to see what they had to say.

- 1 DR. ROSS: Just introduce yourself.
- 2 DR. FERRUSI: My name is Ilia Ferrusi
- 3 and I'm from Novartis.
- 4 A lot of good points have been covered
- 5 here. Standard practice when developing
- 6 instruments is to develop them at no more than
- 7 eighth-grade reading level, and I did want to
- 8 address one component, whether all of the items
- 9 are relevant, I can't remember who asked the
- 10 question, but for instruments that are
- 11 developed as standalone instruments, so I'm not
- 12 talking about something like an item bank where
- 13 you pick and choose, but something like the
- 14 FACT-G for example has been developed, and has
- 15 domains within it.
- When cognitive debrief is done, so a

- 17 first draft of the instrument has been
- 18 developed and the cognitive debrief is taking
- 19 and sitting down with a patient in that
- 20 population, that's a really important part.
- 21 You're talking to real patients who have the
- 22 disease condition of interest, and you ask them
- 23 to work through the items and tell them how
- 24 they're interpreting this, how they understand
- 25 the response options. You also would go

- 1 through a practice of asking is this relevant
- 2 to you, do you feel that any of these items are
- 3 repetitive, and that's a very purpose-driven
- 4 process that we go through to ensure that we're
- 5 not asking too many questions and the fit is
- 6 just right.
- 7 So some instruments like, the
- 8 instruments that, Dr. Basch has actually
- 9 summarized their development, and he talked
- 10 about content validity, if you saw a smiley
- 11 face or checkmark next to content validity,
- 12 that's some of what he was talking about.
- DR. ROSS: Thank you. Dr. Cheng.
- DR. CHENG: Joe Cheng. I just, I

- 15 still need some clarification as far as what
- 16 the concerns are about collecting
- 17 patient-reported outcomes, and I guess my
- 18 question really is, there seems to be a lot of
- 19 concern about using PROs in following how
- 20 patients do. Do you have another suggestion,
- 21 then, for collecting quality added life years,
- 22 or how do you really assess things like
- 23 minimally clinically important difference, and
- 24 then really, how do you risk adjust without
- 25 collecting this data, the results of your

- 1 patients? And then how do you then coordinate
- 2 whether this is related to an episode of care
- 3 versus fixed time points?
- 4 And I guess that's what I'm saying,
- 5 because all the concerns about PROs seem
- 6 applicable through all of medicine, whether
- 7 it's a stroke, or spine, or any tertiary center
- 8 would seem to have the same concerns that you
- 9 have about follow-up patient care. I'm just
- 10 still trying to figure out how does this apply
- 11 directly to CAR T, and are you saying that we
- 12 shouldn't be collecting any of these PROs for

- 13 anything we do, or quality added life years are
- 14 not as important? I guess I just want some
- 15 clarification on that.
- 16 DR. SIDANA: Surbhi Sidana, Mayo
- 17 Clinic. I think it's very important to collect
- 18 these data, that's why we are doing them. I
- 19 think what's not clear is exactly which ones.
- 20 Again, we don't want to burden our patients too
- 21 much but we also want to get the answers right,
- 22 what is important to collect and then how
- 23 frequently do we need to collect it? Do we
- 24 collect it every week for one year, do we
- 25 collect it every month for two years, like when

- 1 are we seeing the changes? I think that's the
- 2 finesse we need to get right, but it's very
- 3 important to collect.
- 4 And I think the third part no one
- 5 really talks about is who's going to pay for
- 6 it, because right now I'm doing a study that
- 7 has only 30 patients we need to collect. It
- 8 takes one patient one hour per questionnaire,
- 9 each patient will fill out seven or eight
- 10 questionnaires, so that's a lot of time for the

- 11 coordinator. And once that patient goes home,
- 12 someone has to call that patient up, or if
- 13 they're filling it electronically and they
- 14 don't answer, someone will be asking that
- 15 question over the phone to ensure completeness.
- 16 And if they've gone away from my practice and
- 17 now they're seeing a local clinician and if
- 18 there's a symptom, even if I see it, what do I
- 19 do? Say they say they're having severe pain on
- 20 that question. Now I'm not following them on
- 21 an everyday basis, so that creates an ethical
- 22 dilemma as a clinician, I don't know what the
- 23 right answer is, but I think it's very very
- 24 important to collect them, but in some way as a
- 25 community, and we're already talking about

- 1 forming a working group. How do we answer
- 2 these questions, like what do we do about the
- 3 data we get, and who pays for it, and how do we
- 4 collect it in a standardized manner so that we
- 5 are collecting things that are important.
- 6 DR. ROSS: Just in interests of time,
- 7 try to keep your answers moving along. There's
- 8 a long line.

- 9 DR. CHUNG: Karen Chung, Juno Celgene.
- 10 I completely agree that patient-reported
- 11 outcomes are important and I think it's
- 12 important to assess them in kind of a
- 13 systematic way, and so that's why in clinical
- 14 trials, you know, we have very good kind of
- 15 follow-up to all these rigorous schedule of
- 16 assessments. If they go off study, we have one
- 17 last assessment. I think the concern is really
- 18 if we had it in the real world that would be
- 19 great, but I don't think the infrastructure is
- 20 there. I don't think there's, you know, a way
- 21 of getting the data systematically and cleanly.
- 22 I mean, we have learned from a lot of trial and
- 23 error in clinical trials a lot of issues with
- 24 data, you know, getting the data collection
- 25 right. And so I think to, you know, have the

- 1 general practices pulling this data together in
- 2 meaningful ways so that we can use it is still,
- 3 we're a little bit far away, you know, with
- 4 regard to that and all the other issues with
- 5 regard to instrument selection and analysis,
- 6 and all the logistics around it.

- 7 DR. GO: I just want to give a
- 8 clinical perspective as a former transplanter,
- 9 as a former allogenic stem cell transplanter.
- 10 CIBMTR has been obviously the biggest group
- 11 that has been for all, mandated by law. That
- 12 took them almost 20 to 30 years before we could
- 13 understand GVHD scoring, and so I think if it
- 14 takes 20 or 30 years to even get GVHD scoring
- 15 right, our opinion is it's going to take a long
- 16 time to really get PROs right, and this is why
- 17 from Kite Gilead, we don't believe that right
- 18 now it's warranted in terms of coverage
- 19 analysis.
- DR. BASCH: Ethan Basch, University of
- 21 North Carolina. Thank you.
- I really, I have to say I came here
- 23 today, I was very very surprised, as you might
- 24 be, to hear the reticence on behalf of some
- 25 stakeholders to collect this information that

- 1 cannot be gathered in any other way in a
- 2 population that we are bringing back to the
- 3 clinic all the time, harvesting from,
- 4 reinfusing, scanning, et cetera, et cetera. We

- 5 are spending a lot of resources on this patient
- 6 population and to not collect patient-reported
- 7 outcomes, which is essentially handing somebody
- 8 a questionnaire, to me frankly seems rather
- 9 absurd.
- There's a many-decade experience
- 11 administering questionnaires to people in
- 12 trials and in the real world with very high
- 13 rates of compliance. There are all different
- 14 kinds of ways to do it, it can be done on
- 15 paper, it can be done with a telephone survey
- 16 system, it can be done with an i-Phone or
- 17 Android system. This is done all the time.
- 18 There are hundreds and hundreds and hundreds of
- 19 registries in oncology patient populations with
- 20 90-plus percent compliance rates using
- 21 electronic devices all over the world now, and
- 22 to say that feasibility is a barrier to me is
- 23 simply refuting an enormous amount of
- 24 accumulated knowledge and ability.
- To the 45-minute or hour-long

- 1 questionnaire, I mean, that seems very unusual
- 2 to me. Our questionnaires that we use

- 3 repeatedly take between five and ten minutes
- 4 long, and we often ask people, to your
- 5 question, did you find the questionnaire
- 6 burdensome or too long, I mean, it's really
- 7 never an issue. There's some trials that have
- 8 longer questionnaires that are spaced out maybe
- 9 every three months, but again, I mean to me,
- 10 compared to what we are asking patients to do
- 11 in order to receive these therapies, this is
- 12 minuscule, so I don't really see the barriers.
- DR. CHENG: Can I ask a follow-up to
- 14 that question?
- DR. ROSS: No. Well, I just wanted to
- 16 allow her to speak, and Dr. Yang has been
- 17 waiting for a long time. I want to make sure
- 18 everyone gets a chance to ask.
- DR. FERRUSI: Thank you, Ilia Ferrusi
- 20 from Novartis. You know, I think many valuable
- 21 viewpoints have been expressed here. What I
- 22 would like to add is that PROs generally, yes,
- 23 are a great thing to measure to understand
- 24 ultimately how the patient's experience is
- 25 going. But what, I want to bring us back to

- 1 principles and make sure we're focusing on why
- 2 we're asking for PROs, what is the research
- 3 question, what is the context in which, because
- 4 the answer to that question, which measure to
- 5 use, is going to vary depending on what you
- 6 want to measure and what the context is.
- 7 So in broad strokes, it is hard to
- 8 answer that question and our position, I would
- 9 like to clarify, is simply that we are not
- 10 comfortable with PROs being required as a
- 11 requirement for coverage or access to a
- 12 medication.
- DR. ROSS: Great. Dr. Yang, do you
- 14 still want to ask your question?
- DR. YANG: This is a question
- 16 addressing the fact that almost everything
- 17 we've talked about here today is about
- 18 capturing acute or on-therapy toxicities, or
- 19 under-appreciating them. The main difference
- 20 in my experience with CAR T, especially with
- 21 CD-19, is it's a one-time treatment, and at the
- 22 back end patients who are responding or doing
- 23 well, which is almost half of those patients or
- 24 more, have a paucity of any interventions or
- 25 requirements at that point, and are we

- 1 capturing that? So do any of the people who
- 2 have PROs associated with their studies have
- 3 questions such as how many people have gone
- 4 back to gainful employment, how much more care
- 5 have they required in the last year or two, and
- 6 how often do they think about their disease,
- 7 how often do they have concern or anxiety about
- 8 their disease, because this can be a one-time
- 9 treatment and then a walk away.
- DR. GO: Will Go from Kite. So, we
- 11 are looking exactly into that, Dr. Yang, in
- 12 terms of the work productivity and activity
- 13 impairments in Version 2.0 in our randomized
- 14 Phase III trial. I think that's the biggest
- 15 thing we're doing, so we are actually looking
- 16 at that in all of our trials since this was
- 17 mandated by the FDA for 15-year follow-up, so we
- 18 are going to get adverse events, look at the
- 19 B-cell aplasia, the use of IVIG, as well as
- 20 some of these other PRO and back to work
- 21 products.
- DR. FERRUSI: Ilia Ferrusi from
- 23 Novartis. To answer your question, no, we are
- 24 not collecting return to work, but the work
- 25 productivity, activity impairment questionnaire

- 1 is a very good tool for that. I would say that
- 2 we are using, again, the FACT-Lym, which has
- 3 physical, social, emotional and role
- 4 functioning, so as a component of role
- 5 functioning, we can certainly look at a return
- 6 to normal activity, and we are continuing to
- 7 collect that data 12, 18, 24 months after their
- 8 administration of CAR T in JULIET.
- 9 DR. ROSS: Mr. Frankel, you get the
- 10 last question.
- DR. BAR: Sorry. To answer this
- 12 question about the long-term follow-up, so yes,
- 13 an effort has been made and is continuing to be
- 14 made to learn about those long-term effects.
- 15 Currently we don't have the data, CAR T-cell
- 16 clinical trials started maybe about five, six
- 17 years ago so the data we have right now is
- 18 limited, and I think in the first few years the
- 19 most excitement was about whether the treatment
- 20 works or not, what was the response rate, and
- 21 people paid less attention to more long-term
- 22 effects and quality of life. However, now when
- 23 we know that maybe there is approximately a

- 24 50-percent response rate and long-term
- 25 response, so people are paying more attention

- 1 to those quality of life questions, and we are
- 2 planning to follow-up patients at least yearly
- 3 for 15 years from now according to the FDA
- 4 requirements, so we are making an effort to
- 5 learn that, but we still don't have data.
- 6 And the thing that I would like to say
- 7 here is that effort has been done, and we will
- 8 make even more effort to learn those questions.
- 9 The question is if we need to make this a
- 10 mandatory thing when we make the decision
- 11 whether or not to reimburse patients for such
- 12 treatment.
- 13 MR. FRANKEL: This question is for
- 14 Dr. Basch and Dr. Kluetz. You advocate for
- 15 PROs to also be given to patients who were
- 16 receiving the standard of care until now. So
- 17 in other words, as a patient, I think that many
- 18 would be interested to know how are patients
- 19 faring in terms of their observation of their
- 20 own outcome when they receive CAR T therapy in
- 21 a specific instance, and how are the patients

- 22 who did not undergo the therapy and have a,
- 23 let's say three-to-six-month survival on
- 24 average, how did their feedback look? And that
- 25 way you could actually compare those two groups

- 1 of patients, and I think that that would
- 2 probably influence many patients much more than
- 3 if they only saw receiving the therapy and they
- 4 saw the drawbacks there, let's say, if they
- 5 were looking at the advantages and
- 6 disadvantages, and they could actually compare
- 7 that to the alternative. Because I think
- 8 without that, the patients are really at a very
- 9 weak position to really have a fully informed
- 10 decision.
- DR. KLUETZ: Paul Kluetz from the FDA.
- 12 So I think one of the problems, one of the
- 13 issues is context which I was talking about a
- 14 little bit earlier, and that is, is this a
- 15 single-armed trial or is this a randomized
- 16 trial. I mean, you won't have that --
- 17 comparing to a historic control is obviously
- 18 going to be very challenging in this field
- 19 right now given the heterogeneity of the tools

- 20 that are used, and assessment frequency and
- 21 things like that, and so really when you
- 22 compare it to the standard of care you're
- 23 talking about a randomized trial much like the
- 24 one that was actually presented as, I guess,
- 25 the second-line trial that was presented.

- 1 Now you could do that, and in fact
- 2 that's the majority of what we get at the FDA
- 3 in oncology, is randomized trials, and they do
- 4 ask the same questions of both arms, and that
- 5 does help to give you a comparison of how well
- 6 they may feel or function on one arm versus the
- 7 other.
- 8 MR. FRANKEL: And how about moving
- 9 forward? So in other words, does that, for
- 10 whatever reason they're not eligible, or they
- 11 opt not to go through CAR T therapy? Maybe
- 12 they're concerned about certain toxicities
- 13 involved, but capturing the data from those
- 14 patients so that the patients in the future who
- 15 have to decide between the two could have that
- 16 at their disposal.
- DR. KLUETZ: Yeah, that may be outside

- 18 of more of a regulatory question but it is an
- 19 interesting question, and I don't know how you
- 20 would design that, but it doesn't seem like
- 21 something you would normally see in the
- 22 regulatory setting.
- I did want to actually add one more
- 24 point to the point of, have people ever used at
- 25 the FDA patient-reported outcomes to make a

- 1 negative decision? Let's remember that in
- 2 oncology we have objective tumor-based
- 3 measures, and survival is our primary efficacy
- 4 measure, and we always have. In many other
- 5 therapeutic areas that's not the case, so I
- 6 don't want to speak for the entire FDA by
- 7 saying we don't use patient-reported outcomes
- 8 in a very important way to make key efficacy
- 9 decisions, because that's actually not true.
- 10 There are many therapeutic areas where the
- 11 disease manifestation is only a symptom and
- 12 that's the only thing to measure, an analgesia
- 13 being an obvious example, and in those you need
- 14 to show that patient-reported outcome is
- 15 improving, or that therapy is not going to show

- 16 any efficacy.
- DR. ROSS: So at this time --
- DR. BASCH: I just want to respond to
- 19 the question briefly.
- DR. ROSS: Please introduce yourself
- 21 first.
- DR. BASCH: Ethan Basch from the
- 23 University of North Carolina.
- So, the most valuable comparative data
- 25 will be from a prospective randomized

- 1 controlled trial, that's one of the reasons why
- 2 it's really important for, you know, sponsors
- 3 in their discussions with regulatory
- 4 authorities, to really think about these
- 5 outcomes and pick them right at the very
- 6 beginning, so we can really understand in that
- 7 context because, you know, we have a little bit
- 8 more equipoise in that setting.
- 9 I think your question really alludes
- 10 to real settings, to registries and postmarket
- 11 surveillance, I would guess. You know, I do
- 12 think there's value in having comparative data
- 13 after a drug is on the market in order to do

- 14 comparisons, especially if that information was
- 15 not really fully characterized pre-approval, or
- 16 if there are not long-term outcomes prior to
- 17 marketing. That said, there are limitations.
- 18 Obviously there are many dimensions of
- 19 selectivity, patient and provider selectivity,
- 20 and so these populations will inherently
- 21 differ, those who did and didn't get the
- 22 therapy of interest, in this case CAR T. And
- 23 so if that was done, then there are methods of
- 24 balancing those differences in observational
- 25 data, they just have to be done very well.

- 1 DR. ROSS: So, thank you to the
- 2 presenters again, and speakers, for continuing
- 3 to answer our questions. So I let us go about
- 4 ten minutes over, this was obviously a very
- 5 rich discussion, and many of the panel members
- 6 had questions.
- We're now supposed to transition to
- 8 the period where we have an open panel
- 9 discussion. I will just note that we are not
- 10 precluded from asking the speakers or
- 11 presenters additional questions, but if you are

- 12 asked, I would request that you keep your
- 13 answers very short. But this is really an
- 14 opportunity now for the panel to further
- 15 discuss the area, to think about in
- 16 anticipation of the voting which is going to be
- 17 in an hour from now, what further information
- 18 we need or that we still feel uncertain on.
- 19 Dr. Goss. Oh, and then -- go ahead.
- 20 DR. GOTTSCHALK: I would like to
- 21 circle back to two things. One of these is
- 22 duration of follow-up. You know, some have
- 23 mentioned the FDA mandate of 15 years, but that
- 24 really comes out of the gene therapy arena to
- 25 look at the risk of insertional mutagenesis

- 1 after the transplantation of genetically
- 2 modified T-cells, so the question is really,
- 3 how long should we really follow-up these
- 4 patients?
- 5 And the other question is, or kind of
- 6 comment is, right now there's no clear proof
- 7 test to track the commercial products, and I
- 8 would encourage the companies to develop those
- 9 because in the PRO assessment if something

- 10 comes up, of course we want to know, what is
- 11 the precursor, are there some measurable
- 12 CAR T-cells, and that is not right now
- 13 available outside the research setting, so I
- 14 think that probably is another key thing you
- 15 really need to assess the safety involved in
- 16 the long-term outcome of these cells.
- 17 DR. ROSS: Can I just ask,
- 18 Dr. Gottschalk, are you asking that question to
- 19 the panel to say clinically, what's the
- 20 appropriate time?
- 21 DR. GOTTSCHALK: What is the
- 22 appropriate time, how long should we really
- 23 follow these patients?
- DR. CHENG: So basically from what I
- 25 understand and from what I heard, like

- 1 Dr. Abikoff mentioned, that 54 percent of
- 2 patients went from partial to complete. I
- 3 assume the symptomatology would also follow the
- 4 difference between a partial versus complete
- 5 remission in nine to 12 months, which means it
- 6 would seem to me you would have to follow at
- 7 least 12 months in order to get -- and that was

- 8 a question that was asked before, so if it's a
- 9 question about the three choices that are
- 10 listed there, it would have to be at least 12
- 11 months or up to 24, in order to see whether or
- 12 not the patient symptoms would follow the
- 13 response rate.
- DR. GOSS: Actually I have a
- 15 contextual question because I mentioned it
- 16 before, but I was wondering if Tamara could
- 17 clarify it for us. The way these questions are
- 18 asked, they're not asked specifically about CAR
- 19 T, I just want to be sure that's correct. So
- 20 we're asking about PROs in the Medicare
- 21 population, and we're asking about some
- 22 specific measures, and then we're asking about,
- 23 you know, ability to implement. But nowhere
- 24 does it say specific conditions and nowhere
- 25 does it say, you know, specific treatments, so

- 1 we might have to think more broadly if we're
- 2 putting a time frame. I understand for CAR T,
- 3 you know, six, 12 or 24 months might be
- 4 appropriate, but for other situations it may be
- 5 longer, and so it may affect how we answer

- 6 these questions. I just want to make sure I
- 7 understand the questions.
- 8 MS. JENSEN: Do you want to add to
- 9 this, Joe? So, I do think it's broader than --
- 10 yes, we didn't specifically say CAR T, so is it
- 11 generalizable, but I'll also look to the team
- 12 to see if they want to add to anything. Okay,
- 13 I'm good. Yes, you are absolutely right.
- DR. CHENG: If that's the case, then
- 15 it makes some of these questions challenging,
- 16 like the length of duration of follow-up,
- 17 because if it's not disease-specific, the
- 18 duration will then obviously change.
- 19 DR. GOSS: And again, most of these
- 20 measures are PRO oriented, or I should say
- 21 oncology oriented, so there's an implication
- 22 there, but it's not, it certainly wouldn't be
- 23 relevant for cardiovascular disease, but the
- 24 way we're answering some of these questions in
- 25 that general sense, CMS could apply these

- 1 recommendations, I guess, more broadly. I just
- 2 want to make sure we know what we're voting on.
- 3 MS. JENSEN: Correct. So, you know,

- 4 the national coverage determination that's open
- 5 is CAR T, but yes, some of these answers could,
- 6 depending on what happened, could be used, we
- 7 might be able to use these more generally as we
- 8 move forward in other types of technologies.
- 9 DR. JAMES: And I'd just like to put
- 10 forth a question I have for CMS. The selection
- of the PROs is one that you have judged based
- 12 on oncology. There's a whole host of others
- 13 out there. AHRQ has developed a whole series
- 14 of CAHPS measures that are used for making
- 15 judgment on the quality of care that is being
- 16 done to patients from their perspective. And
- 17 the National Quality Forum also contracts with
- 18 CMS in looking at PROMIS for the development of
- 19 quality-based measurements. Are any of those
- 20 in play or are those future developments?
- MS. JENSEN: Those are not in play for
- 22 this MEDCAC.
- DR. CHENG: I would actually, then,
- 24 just kind of think that we are looking at this
- 25 specifically for CAR T, because for example if

1 you look at PROMIS, PROMIS goes from everything

- 2 from, you know, the PROMIS-10 which you can
- 3 crosswalk to EQ-5D-3L for example, as a
- 4 historical control to these other
- 5 disease-specific measures, so I think when
- 6 we're looking at this, unless we put it in the
- 7 context of oncology and specifically CAR T, it
- 8 would be very challenging to make heads or
- 9 tails of how to answer it, because you can't
- 10 compare PROMIS, for example, to MDASI outside
- 11 of a specific context.
- DR. ROSS: Yes, I think we should be
- 13 encouraged on oncology for sure, including
- 14 CAR T. I would keep us, we should not be
- 15 thinking outside of the oncology space.
- DR. GOSS: Just a comment, or really
- 17 thought that I had that I want to share with
- 18 the other panel members is particularly when
- 19 you think of a situation like CAR T, I was an
- 20 observer at a MEDCAC a month ago on a
- 21 completely different therapeutic area, and one
- 22 of the presenters got up and said, you know,
- 23 one of the most important things for a patient
- 24 that they want to know is what can I do to stay
- 25 independent.

- 1 So on one level, PROs, everything that
- 2 is local and specific to an individual patient
- 3 is important to them, and you know, being
- 4 functional and not being a burden on their
- 5 families or their caregivers is very important,
- 6 and it seems to me that the patients who got
- 7 into the CAR T trials didn't get there by
- 8 chance, there is significant selection bias
- 9 where patients sought out treatments, they had
- 10 nothing, you know, they felt they had nothing
- 11 else to lose, but not every patient with a
- 12 cancer actually feels that way, so some
- 13 patients are willing to forgo treatment and
- 14 toxicity in order to be able to have peace, you
- 15 know, for whatever time they have left.
- And so I think there's a -- and the
- 17 industry team I think did a very nice job of
- 18 presenting your studies, except I don't think
- 19 your findings from your trials are
- 20 generalizable to Medicare per se because of
- 21 that, number one. And so I think your notion
- 22 that well, we believe in PROs but we're going
- 23 to measure them in trials, I think is great and
- 24 is important, helps the regulators make
- 25 decisions, but it doesn't generalize to what

- 1 Medicare has to deal with in terms of whether
- 2 or not these should be more broadly available.
- 3 And so I think it's important if you're not
- 4 going to support this type of notion for going
- 5 forward in some really systematic way, I think
- 6 you'd be well advised to Phase IV studies to
- 7 include additional PROs to help inform these
- 8 questions that will inevitably come up again,
- 9 because I think, you know, the population
- 10 you've studied is a very slim narrow part of
- 11 the population that could eventually be trying
- 12 to seek out this treatment, and I think that's
- 13 a concern.
- DR. CUYJET: I just have a comment to
- 15 make and I think one of, part of this
- 16 conversation in order to be used as a
- 17 brainstorming operation on how to do things
- 18 better, it was mentioned that physical activity
- 19 is a very important monitor for improvement.
- 20 In my past experience we used telemedicine in
- 21 experiences with heart failure in Medicare
- 22 patients, and usually you don't just have heart
- 23 failure, you have diabetes or hypertension, or
- 24 an abnormal lipid profile, and if you can get

- 1 to invest in the heart failure and not take
- 2 care of your diabetes and not take care of your
- 3 other comorbid conditions. So I think we ought
- 4 to start thinking about the mobile technology
- 5 that's emerging as an opportunity to track
- 6 patient improvement independent of pure
- 7 patient-reported outcomes which can be very
- 8 subjective depending on time of day and how I'm
- 9 feeling and how much pain I'm having. But
- 10 there may be a more, a better tool to improve
- 11 outcomes over a period of time, and it's stuff
- 12 that can be transmitted electronically, it
- 13 doesn't require -- you can decide whether you
- 14 want to monitor on a weekly or monthly, or
- 15 bimonthly basis, it's entirely -- I think we
- 16 ought to start thinking about how going forward
- 17 we can track better patient outcomes and
- 18 responses more easily with better information.
- 19 DR. PERISSINOTTO: I just want to add
- 20 to what you said because, or to both of you
- 21 actually, because my biggest challenge now as a
- 22 clinician in geriatric and palliative medicine

- 23 is exactly this question. When my patients go
- 24 to see their oncologists or their surgeons, and
- 25 they're trying to understand the risks and

- 1 benefits of consenting to these procedures, and
- 2 most of the time the data that's presented is
- 3 around survival, it's around dying in the OR
- 4 and very narrow-based things. Yet what my
- 5 patients want from me is to know what is my
- 6 quality of life going to be like afterwards and
- 7 am I going to walk, what is my cognition going
- 8 to be like? So these tools, whether we use
- 9 them to approve drugs, or we use them in what
- 10 part, it is important to know how is this going
- 11 to inform them, and help me as a clinician in
- 12 assisting them in their decisions.
- DR. GOSS: Yeah, I think a shared
- 14 decision-making model would be really important
- 15 here.
- DR. PERISSINOTTO: A novel idea.
- 17 DR. GOSS: And you know, honestly, and
- 18 I don't know how this would play to the PRO
- 19 experts, but if you look at the PRO and getting
- 20 some kind of time trade-off, and giving the

- 21 vignette of what, you know, if you think about
- 22 what cytokine release syndrome looks like and
- 23 explain that to a patient, you know, here's
- 24 your chance of survival but here's what you're
- 25 going to have to go through before you're

- 1 feeling better that might be even more
- 2 relevant because that has to do with the
- 3 decision to treat or not to treat, which is
- 4 different than what do I look like nine months
- 5 from now. So just a thought, because it's a
- 6 different set of concerns, but it could be very
- 7 important to patients and to providers.
- 8 MR. FRANKEL: I don't want to harp on
- 9 it, but when you treat those patients in a
- 10 geriatric population, when it's presented to
- 11 them, do you think that it's crucial for them
- 12 to see the alternate paths? So in other words,
- 13 if you hone in on one potential therapy and you
- 14 discuss the risks versus benefits, and they say
- 15 well, they don't want to have these types of
- 16 potential adverse events, and then I think a
- 17 key part of that discussion has to be well, if
- 18 you don't do this therapy, these are the

- 19 quote-unquote adverse effects of not doing
- 20 anything and it's not exactly a pretty list
- 21 either. So I think if you don't give that list
- 22 in a very clear and transparent way, then the
- 23 patients are not really making an informed
- 24 decision, they're making a very biased decision
- 25 because they're only seeing the drawbacks,

- 1 they're not seeing the optimal potential
- 2 outcomes and the risks, in this case death, and
- 3 a death that could potentially have a very
- 4 challenging period of time until that point in
- 5 the next few months.
- 6 DR. PERISSINOTTO: Yeah. I think if
- 7 you really look at a shared decision-making
- 8 model, you're not really starting with the
- 9 risks and benefits, you're starting with what
- 10 are your goals and what are you hoping for, and
- 11 if you start from that point, then you back in
- 12 to the risks and benefits of treatment versus
- 13 not treatment. So I think that absolutely you
- 14 have to, you know, weigh the cases of, for
- 15 example, you have metastatic GI cancer and you
- 16 can go through a surgery and chemotherapy and

- 17 have significant toxicity and end up with, you
- 18 know, a pouch after the surgery, and without
- 19 that treatment you will have a bowel
- 20 obstruction, so it is looking at how you will
- 21 die. It is also looking at limited life
- 22 expectancies, and as we heard with these
- 23 trials, you're looking at people already with
- 24 limited life expectancies, and you do have to
- 25 weigh those, but it is starting from the start.

- 1 What we don't often do as clinicians is saying
- 2 what are you hoping for, because if someone
- 3 tells me I don't want to prolong my life and I
- 4 want to focus on the quality, then that's a
- 5 different thing than saying I want to prolong
- 6 my life at all costs regardless of side
- 7 effects.
- 8 MR. FRANKEL: Do you think that that
- 9 answer can change depending on the data that's
- 10 provided to them, so if a person says --
- DR. PERISSINOTTO: Yes, absolutely.
- MR. FRANKEL: Right, so that's what
- 13 I'm saying that may be critical here, because
- 14 we're dealing with a patient population where

- 15 education is key and that's what the PROs are
- 16 all about, it's to be able to educate the
- 17 clinician and the patient alike. And if you're
- 18 only collecting and emphasizing the data of the
- 19 risks versus benefits of the new therapy and
- 20 not very clearly articulating the alternative
- 21 course, then I just think that patients are, I
- 22 mean in the context of patient advocacy, most
- 23 patients in my experience want to live and they
- 24 want to live with good quality of life, that's
- 25 ideal.

- 1 Then the question comes, well, if you
- 2 can't have that, then what's the best
- 3 alternative? And many times if the best
- 4 alternative is survival, it's well, how's that
- 5 survival going to look, is it going to be
- 6 painful next few months and death in one, let's
- 7 say for example. Is it going to be a painful
- 8 next six weeks and then survival with a
- 9 restoration of quality of life, perhaps with
- 10 CAR T therapy.
- DR. JAMES: We're addressing the whole
- 12 area of patient preference, which is really not

- 13 addressed in PROs, but is the next step up from
- 14 that, because you can get informed information
- 15 and share that with the patient, but without
- 16 understanding what the patient's goals and what
- 17 the family goals are, you don't have that
- 18 preference.
- DR. ROSS: Yeah, and I'll just note
- 20 that in shared decision-making, it's not
- 21 treatment yes-no, it's treatment path A versus
- 22 treatment path B, and PROs are aspects of
- 23 information that help inform those goals of
- 24 care, they're not actually the shared
- 25 decision-making themselves. So we're talking

- 1 about information that can inform the patient
- 2 care plan in terms of what their goals are,
- 3 what their objectives are, if quality of life
- 4 is more important than mortality, or whatever
- 5 the tradeoffs may be.
- 6 DR. CHENG: I think that's the
- 7 disconnect that I'm seeing here, is that we're
- 8 talking about the quote-unquote real world
- 9 application and real world assessment versus
- 10 the clinical trials and the inclusion-exclusion

- 11 criteria, because we know that when we treat
- 12 patients in a clinic we don't follow
- 13 exclusion-inclusion criteria the way we do in
- 14 these clinical trials.
- 15 And so maybe getting back to one of
- 16 the discussion points was are there other PRO
- 17 assessments, I guess the question I would pose
- 18 to the group is, are these too specific for
- 19 cancer per se, and should we be looking at this
- 20 as a simple EQ-5D to say look, all we want to
- 21 care about is what's the quality of life here
- 22 of a treatment, something that's easy to do.
- 23 EQ-5D, I think it's hard to argue that that's
- 24 an onerous add, but yet would give us a general
- 25 health assessment whether or not going for a

- 1 treatment, or any type of treatment, whether
- 2 it's CAR T or lifelong IVIG, et cetera, how
- 3 much effect it would really help. Because
- 4 that's something that we could then talk to our
- 5 patients about, the whole idea of the quality
- 6 of life here.
- 7 So I guess that's a question. I know
- 8 we're being asked to talk about these PROs, but

- 9 one of the concerns from everything we heard is
- 10 that these are just too onerous to get on a
- 11 regular basis for the data that we're getting
- 12 out of it, and should we take a step back and
- 13 just say for example for PROMIS, let's start
- 14 off with a PROMIS-10, let's start off with
- 15 something modular that we can build up, but
- 16 still gives us the idea that, is this treatment
- 17 really helping somebody, or are we looking at
- 18 administrative or other variables that the
- 19 patients may or may not care about?
- DR. GARRIDO: I think there's a
- 21 tension between finding a scale that provides
- 22 useful enough information but that is still
- 23 going to be sensitive to changes after
- 24 receiving a treatment. We don't want measures
- 25 that are too specific related to very specific

- 1 adverse events that are only going to occur in
- 2 a subset of patients or a subset of therapies,
- 3 but if we go to too global of a measure, will
- 4 we see any meaningful change in that after
- 5 receiving some type of therapy, whether it's
- 6 CAR T or something else. I don't know the

- 7 answer.
- 8 DR. PERISSINOTTO: And also I think
- 9 that it was mentioned a couple times before,
- 10 you know, in surveys you have patients that say
- 11 oh, I remember three words from last time, I
- 12 don't have problems with cognition if I
- 13 remember them from last time, but certainly
- 14 that's part of it. But I do like one of the
- 15 things that I think Dr. Basch said in terms of
- 16 the additional characteristics of maybe having
- 17 some general health assessments and part of
- 18 that would be dealing with function and
- 19 physical health, because I think I mentioned
- 20 earlier, it is clearly a struggle for all of us
- 21 in how we measure cognition in a more reliable
- 22 way, both in terms of adequate measures and
- 23 then being self-reported.
- DR. CIVIC: I have kind of a related
- 25 thing, a little bit of a committee process

- 1 that, you know, we're looking at these
- 2 instruments and we may or may not want to add
- 3 more to our list at this point, but we've also
- 4 talked about how this is a developing field and

- 5 that there aren't necessarily, you know, there
- 6 might be better instruments developed in the
- 7 future or CAR T specific instruments. So it's
- 8 like choosing some, you know, one, two, three,
- 9 four, or seven of them now, probably that's not
- 10 going to preclude the addition of other
- 11 instruments as they get developed, but it's not
- 12 entirely clear.
- DR. ROSS: Well, I can let CMS answer
- 14 that. I think because it's part of the
- 15 discussion questions that they are looking for
- 16 our advice on things that they should be
- 17 considering in the future as well. Is that
- 18 correct, or not exactly?
- MS. JENSEN: No, I think -- I mean,
- 20 that's -- I don't think this is the end of this
- 21 conversation, and so this is what we have for
- 22 today.
- DR. ROSS: Dr. Yang.
- DR. YANG: You know, I think we can
- 25 either make these PROs too specific or too

- 1 general. If you make them specific, you have
- 2 the advantage of them being applied to the

- 3 treatment you're talking about. If they're too
- 4 general, you put the burden on patients to
- 5 decide their global assessment. And if they're
- 6 nauseated at the time they're filling out the
- 7 questionnaire, they're not thinking about the
- 8 surgery they need next week or the IV they
- 9 might need next week, they're thinking about
- 10 this problem right now, so I see that as the
- 11 problem in both directions.
- 12 And so -- and the other problem I have
- 13 is when you're talking about metastatic cancer,
- 14 for instance, the outcomes for solid tumors are
- 15 all the same, so you're just discussing how
- 16 much intervention, quality of life and other
- 17 issues, but if you're talking about a
- 18 potentially curative treatment, who fills out
- 19 the questionnaire for the patient who dies, and
- 20 what do they put down? So I don't really know
- 21 how you can globally assess, then, the impact
- 22 of the treatment if the other alternatives, if
- 23 one of the possibilities is you could get over
- 24 this cancer.
- DR. GARRIDO: Related to that, we have

- 1 our question about the optimal duration, or how
- 2 confident we are about whether we can get
- 3 meaningful results if we look at a six-month
- 4 trajectory, or a 12- or 24-month trajectory of
- 5 PROs. I'm concerned about long-term monitoring
- 6 of PROs and survival drop off, especially if we
- 7 end up doing some kind of long-term follow-up of
- 8 a therapy versus standard of care using a
- 9 registry. So if we have patients who aren't
- 10 able to answer questions either because of an
- 11 adverse event or due to differential mortality
- 12 in the two groups, it's going to make it very
- 13 difficult to isolate these after the treatment,
- 14 even with the best practices in observational
- 15 data analyses.
- 16 I run into this all of the time in
- 17 palliative care research where one of the main
- 18 goals is improving quality of life, we're not
- 19 trying to improve survival, but it's, the
- 20 people who are getting palliative care versus
- 21 not, no matter what we do to try and make
- 22 comparable treatment groups, they're so
- 23 different that it's really hard to isolate the
- 24 effects of palliative care.
- 25 Just something to take into account as

- 1 we're thinking about meaningful durations for
- 2 looking at these measures.
- 3 DR. CHENG: And I guess I would just
- 4 answer, you know, if someone passes away,
- 5 certainly functional outcomes are pretty
- 6 irrelevant, so I don't think that's really a
- 7 good point. But I think one of the things
- 8 we're really talking about is just the
- 9 challenge of postmarket surveillance of any
- 10 treatment, and I don't think that's something
- 11 that we can say isn't needed or is too hard to
- 12 do, because the durability of any treatment is
- 13 going to be pretty important irrespective of
- 14 the field. And so I think from a larger
- 15 standpoint, we do need to look at ways of
- 16 assessing what is the durability and the
- 17 long-term outcomes for our patients, and
- 18 whether or not it's a short-term gain or
- 19 long-term gain does depend on whether or not we
- 20 want to put our patients through this overall.
- 21 So as a surgeon, if I do a surgery
- 22 for, you know, for a metastatic tumor, then
- 23 sure, I can get them through it and they'll do
- 24 fine for six months and still pass away, but
- 25 boy, is that worth it if they have

- 1 postanesthesia issues like postoperative
- 2 cognitive issues, et cetera. And I think that
- 3 is the question that needs to be answered here,
- 4 which is, is there a surveillance tool, you
- 5 know, that we can use to assess whether CAR T
- 6 or other treatments have the durability of
- 7 effect, or is it something that we follow for
- 8 three to six months, it seems okay, and then in
- 9 two years durability starts waning, and whether
- 10 or not that's worthwhile, or is it the IVIG
- 11 that helps keep it from getting there?
- DR. ROSS: And I also want to
- 13 emphasize, particularly in the realm of
- 14 postmarket surveillance, we're not necessarily
- 15 just thinking about these PROs for patients who
- 16 lived versus died and how to then assess the
- 17 missingness, but you know, quite often this
- 18 type of information as new therapies come to
- 19 market and other therapies gets tweaked, this
- 20 happens quite commonly in the medical device
- 21 space, you know, that the devices themselves
- 22 improve over time, you use this type of
- 23 information to better understand symptom burden

- 24 with those sort of, you know, iterative product
- 25 over time, and comparatively across products.

- 1 MR. FRANKEL: In terms of the
- 2 neurologic toxicities, which really goes hand
- 3 in hand again with the question of how long to
- 4 capture the data, I think that it was mentioned
- 5 by Dr. Go and Dr. Ferrusi about 14 months or
- 6 so, that Dr. Go mentioned 14 months in terms of
- 7 seeing a complete response when there wasn't
- 8 until that point. But what about, in terms of
- 9 neurotoxicity, how long did you see that at
- 10 that point at 14 months, what percentage of the
- 11 patients that had neurotoxic effects did you
- 12 still see at that point along the line?
- DR. ROSS: If you get a question
- 14 directed to you, you may stand.
- DR. GO: Will Go from Kite. So yeah,
- 16 we're still exploring that in all of our
- 17 studies, so we don't really have all the data
- 18 right now, but in general we only had at that
- 19 point in time when we get a cutoff that we will
- 20 then file with the FDA as well as will be
- 21 publishing in a journal, we had one patient

- 22 with grade one memory impairments. So that's
- 23 sort of the work that we're doing, but again,
- 24 these are sort of crude measures as well, and
- 25 so as I said before, we're trying to figure out

- 1 how to do this because we are very interested
- 2 in PROs, as well as neurocognitive testing, so
- 3 we're exploring those opportunities right now.
- 4 MR. FRANKEL: And how do you, did you
- 5 adjudicate which neurotoxicities observed were
- 6 related specifically to therapy versus just
- 7 because of hospitalization that you see in an
- 8 older population?
- 9 DR. GO: Right, where's my FDA
- 10 colleague? Oh, he's gone, all right. I'm
- 11 going to tap him in in a second here. So
- 12 that's exactly right, and so obviously we do
- 13 have attributions in our clinical study to, is
- 14 it related to the CAR T therapy, is it related
- 15 to disease, is it related to the cytotoxic
- 16 conditioning chemotherapy.
- 17 MR. FRANKEL: Or is it delirium
- 18 because of an in-hospital experience?
- DR. GO: Correct, so we don't have it

- 20 specifically, so all we ask is, is it related
- 21 to CAR T, yes-no, and then in our new trials is
- 22 it related to disease, yes-no, and that's the
- 23 only thing that we really have, it's very crude
- 24 and rudimentary, but this is exactly the
- 25 question to clinically, and as I used to

- 1 practice, I mean, I get delirium in the ICU
- 2 with all the beeping, you know, when I was an
- 3 ICU resident, so that's --
- 4 DR. GOSS: Was the neurotoxicity
- 5 measured with a PRO measure or was it usually
- 6 Barthel or something else?
- 7 DR. GO: So, this is why -- sorry to
- 8 interrupt, but this is why the second time we
- 9 did a mini-mental status exam, because one,
- 10 that had already been tested in blinatumomab
- 11 prospectively, but obviously you can't even do
- 12 a mini-mental status exam because you're in
- 13 Grade 3 neurotox that means a mini-mental
- 14 status exam's a zero. And that's why, you
- 15 know, rudimentary we went from a 27 to 30,
- 16 which is roughly normal, the patients who had
- 17 Grade 3 neurotox went to zero and then came

- 18 back to roughly 27 or 30.
- This is the challenge. We didn't do
- 20 any proxies, because obviously that's another
- 21 challenge to collect that. And then to your
- 22 point, though, this is why I think it's
- 23 challenging, especially in the neurotox
- 24 setting. What we try to do for consistency,
- 25 number one, we use a CTCAE 4.03, we do not

- 1 have, we collected all of it, we provided all
- 2 of it. And this is a challenge because some of
- 3 the neurotoxicities were at the time of death
- 4 and clearly with patients who had progressive
- 5 disease, so this is why this is a challenge,
- 6 because as a lot of people know, how do people
- 7 die of leukemia and lymphoma and fascial
- 8 diseases and progressive diseases, and a lot of
- 9 times the patients are in an impaired
- 10 neurologic state.
- And I'll tap in my FDA colleague.
- DR. KLUETZ: Paul Kluetz from the FDA.
- 13 The issue of attribution, I can't stress, is
- 14 one of the most challenging factors in
- 15 evaluating clinical trial data because of all

- 16 of the situations that you've just mentioned.
- 17 Disease can cause it, treatment can cause it,
- 18 comorbid disease can cause it, and many times
- 19 it's very complicated and challenging. In
- 20 fact, this is why we don't like disease-free
- 21 survival as an endpoint. Even though it would
- 22 be nice and clean, when patients die, it's very
- 23 hard to determine whether or not it was due to
- 24 disease or due to something else.
- And so what, the way we look at

- 1 attributions in a randomized trial, if it was a
- 2 randomized placebo-controlled trial, even
- 3 better, but we hardly see those much anymore,
- 4 so in single-armed trials we just assume that
- 5 for now, until we get more data, that it is at
- 6 least possibly related to the drug.
- 7 DR. BAR: Specifically regarding the
- 8 neurotoxicity, so there is some data from our
- 9 institution, and definitely patients that are
- 10 undergoing the CAR T-cell CD-19, they do have
- 11 neurotoxicity, patients who develop CRS are at
- 12 high risk for developing neurotoxicity, and
- 13 there has been a trial that was published a few

- 14 months ago from our institution trying to
- 15 understand the mechanism that caused the
- 16 neurotoxicity.
- 17 There is no clear answer but there is
- 18 some direction showing probably that there is
- 19 some permeability of the blood-brain barrier
- 20 that caused increased toxicity. However, what
- 21 we found was that the neurotoxicity is usually
- 22 short term, and even patients that develop
- 23 neurotoxicities, patients with CRS
- 24 neurotoxicity, it is usually short term and
- 25 patients do recover within a number of weeks.

- 1 So when we started to look at
- 2 longer-term data on those patients, we did not
- 3 see the patients that had short-term
- 4 neurotoxicity have some cognitive defects
- 5 later, its early data, and we didn't study
- 6 that very systematically, but from the data
- 7 that we have, even though they had high risk of
- 8 neurotoxicity if they developed CRS, it was
- 9 short term and with no long-term cognitive
- 10 effects.
- DR. ROSS: Dr. Yang.

- DR. YANG: You know, when I think
- 13 about the issue of mandating a PRO, I think of
- 14 you have a purpose for that, you know how to
- 15 use that information if you're going to mandate
- 16 its acquisition, and I wonder how I would use
- 17 that information if I were a clinician and had
- 18 an infinite database on PRO information, I
- 19 could present 13 percent nausea incidence to a
- 20 patient, five percent severe, or I could say,
- 21 you know, 87 percent of patients don't have
- 22 nausea, and I could say the same thing about
- 23 almost every complication. And then I would
- 24 also have to integrate that with, you know, you
- 25 have a 30 to 35 percent chance of having a

- 1 durable complete response. So I find this, the
- 2 information is definitely helpful, definitely
- 3 useful, but I don't know how I would
- 4 specifically apply it in a uniform consistent
- 5 fashion, if I had it all.
- 6 DR. OLSON: I can respond to that to a
- 7 certain extent as a patient, specifically as a
- 8 patient who reported outcomes with one of the
- 9 CAR T clinical trials since I was in one

1	(	)	unfortur	nately	about,	almost	eight	years	ago

- 11 There was one patient, actually two patients
- 12 treated before me. We had no idea what was
- 13 going to happen, but fortunately I had two
- 14 patients just ahead of me, and I was warned
- 15 that I was going to get sick and what the
- 16 symptoms were going to be and what to expect,
- 17 and that really helped because when I started
- 18 getting sick I went yay, it's working. But it
- 19 takes a little of the scary out of it to know,
- 20 okay, somebody else got treated this way, I'm
- 21 reacting the same way, it makes me feel better.
- And again, you know, whether it's
- 23 percentages or just general information of
- 24 here's what to expect, especially in clinical
- 25 trials where, you know, the trial I was in, the

- 1 only animals that had been treated were mice
- 2 before the three of us, so there's not much
- 3 data, but as that data grows, they will feed it
- 4 back to the patient who is considering a
- 5 clinical trial, and I think that is really
- 6 important.
- 7 And another piece of that is that I'm

- 8 part of the LLS First Connections program, so I
- 9 provide to a certain extent the
- 10 patient-reported outcomes, a lot of CAR T
- 11 patients that we have now, to approved drugs,
- 12 I'm getting probably a connection one or two
- 13 times a month, and what the patients want to
- 14 hear is what do I expect, what's going to
- 15 happen, I've read this. And of course you have
- 16 to be careful, you're not their doctor, but at
- 17 the same time it's so comforting to them to
- 18 hear somebody else that's been through this and
- 19 they survived, and to know what they're going
- 20 to expect, you know, when they go into those
- 21 things, okay, you know, Doug told me that's
- 22 going to happen.
- I literally just yesterday got an
- 24 email from one of my First Connections patients
- 25 that I had talked to probably three months ago,

- 1 and she sent me a note. She said I want you to
- 2 know I went through my CAR T therapy and it was
- 3 really a battle, and she had a lot of
- 4 neurological effects, she said they knew how to
- 5 treat them, she was rough, but on the other

- 6 side she's in complete remission, and it was
- 7 really worth the fight, but she knew all the
- 8 stuff going in. So really, it takes the fear
- 9 away.
- 10 And then I have one more comment since
- 11 I have the microphone. We were talking about
- 12 duration of follow-up. CAR T-19 is creating a
- 13 whole new group of patients that haven't
- 14 existed before. A lot of us don't have
- 15 B-cells. I get my IVIG once every, right now
- 16 I'm getting it every other month, I was getting
- 17 it every three months, and we're feeling our
- 18 way along, but to be able to continue, I'm
- 19 almost eight years out as I said, but I'm still
- 20 without B-cells, and there's a whole bunch of
- 21 folks coming behind me, so I think long-term
- 22 follow-up is going to be important.
- And just one more comment about PROs
- 24 and clinical trials. I get a little bit
- 25 worried when I hear some folks expressing the

- 1 fact that it may make it difficult to get some
- 2 clinical trial started or that it's going to
- 3 slow down enrollment or whatever, and I

- 4 certainly would caution CMS with regard to how
- 5 it gets the requirement for PROs in clinical
- 6 trials, how it gets applied, such that it
- 7 doesn't get in the way of patients getting
- 8 enrolled and being able to participate in the
- 9 clinical trials, because right now it offers so
- 10 much help and hope to patients.
- DR. ROSS: That was very helpful,
- 12 thank you. Other questions from the committee,
- 13 or discussion points that they want further
- 14 considered?
- DR. CHENG: I think, you know, when we
- 16 talk about PROs and clinical trials, I think,
- 17 you know, there's a number of what I would call
- 18 disconnects because we're seeing a number of
- 19 societies and national organizations develop
- 20 their own registry effort to collect patient
- 21 outcomes, whether it's Neurosurgery with QOD,
- 22 or the Society of Thoracic Surgeons, et cetera,
- 23 and so it seems that some of the concerns that
- 24 were brought up before, with for example data
- 25 acquisition I think Red Cap is a fairly cheap

1 or free tool. And so I think as we move

- 2 forward, I think PROs are going to be something
- 3 that is going to be captured, like in
- 4 Washington State where we capture scope over in
- 5 Seattle on a regular basis, irrespective of
- 6 whether it's a trial or not, and I think the
- 7 idea of understanding what is the quality of
- 8 the care we provide patients is going to be
- 9 important, not just for oncology but just for
- 10 medicine in general, and I'm saying that the
- 11 tide is going in that direction where we have
- 12 to be able to show the benefits of anything
- 13 that we do in medicine, and whether we like it
- 14 or not, the PROs are probably going to be the
- 15 best way to do that, because you can't do a
- 16 randomized controlled trial for every single
- 17 question we have in medicine, not
- 18 realistically.
- 19 DR. ROSS: Dr. James.
- DR. JAMES: One point that Dr. Basch
- 21 raised that I think we need to consider, and
- 22 that is as we sit and talk in terms of what is
- 23 being recorded by physicians on adverse effects
- 24 versus what comes out from a PRO, there's a
- 25 gap, and how do we explain to our patients that

- 1 gap between what's being reported to the FDA
- 2 and what patients are reporting.
- 3 DR. ROSS: Dr. Feinglass.
- 4 DR. FEINGLASS: I think everybody on
- 5 this panel, industry included, would be the
- 6 first to say that the patient's view is
- 7 important, and at the end of the day the
- 8 patient comes first. None of us are here for
- 9 any other reason than that, or I hope we're
- 10 not. But I think the other piece surrounding
- 11 PROs in general is the heterogeneity of the
- 12 field, which in some cases the PRO is
- 13 constructed to be different from another PRO on
- 14 purpose, so I think what the panel has to make
- 15 a decision on at the end of the day in answer
- 16 to the questions from CMS are not specific to
- 17 CAR T, they are specific to, are PROs useful in
- 18 the arena of clinical research, and how do they
- 19 inform the decisions that we are going to make
- 20 while we see patients, while we conduct trials,
- 21 while we design treatments.
- So one of the things I want to make
- 23 sure we all remember at the end of the day is
- 24 not only the number one thing, that the patient
- 25 is at the end of it, the second part is as

- 1 we're considering the tools, they're
- 2 heterogeneous on purpose in some cases, and how
- 3 are we going to use that uniformly, are they
- 4 generalizable, are they not generalizable, and
- 5 I think what we've heard many of the presenters
- 6 say today is they are meant to be used in very
- 7 specific cases, they are meant to be used with
- 8 care, they are not applicable to everything,
- 9 and I think as we consider the questions, we
- 10 need to keep that in the back of our minds.
- DR. GOSS: I was just going to say a
- 12 couple last thoughts, and I agree. I mean, the
- 13 patient effectively is critical, and I think
- 14 it's valuable that CMS is actually asking these
- 15 questions and addressing this issue. I
- 16 remember a number of years back, so some of the
- 17 data we can get from clinical trials that is
- 18 very useful, and obviously it's almost a
- 19 standard, and probably is a standard for FDA to
- 20 require PRO endpoints in, or PRO data in
- 21 clinical trials. And there's still, even with
- 22 that, there's still some gaps, so there's
- 23 opportunities to fill gaps.
- 24 My recommendation to CMS is to keep

- 1 flexible because the field is in motion, it's
- 2 evolving, and I think there's valuable
- 3 information here that will guide decisions made
- 4 by patients, decisions made by payers on, you
- 5 know, what's valuable and important in
- 6 treatment and technology. And you know, I
- 7 think overall, we would be well served to
- 8 remember that. When we don't have complete
- 9 clinical information, PRO data can at least
- 10 provide good color and give guidance.
- So, I remember 15 or 20 years ago, CMS
- 12 issued a coverage determination or an NCD for
- 13 treatment refractory seizures. The important
- 14 question was, well, it doesn't cure the
- 15 disease, why would we pay for this, and the
- 16 answer is because it showed a significant
- 17 reduction in the events, and there was a strong
- 18 correlation between the reduction in events and
- 19 patients' quality of lives. So there is a way
- 20 to bring it back to patients, and that's really
- 21 important for us to remember.
- So even if we don't have a perfect

- 23 solution, it's worth trying to improve the
- 24 field and make incremental gains as we go,
- 25 rather than throw our hands up and say there is

- 1 nothing to do.
- 2 DR. ROSS: Okay. Do any of the
- 3 committee members want to make any final
- 4 comments during this discussion period?
- 5 MR. FRANKEL: I echo a point that was
- 6 made a little bit earlier, that I would be
- 7 hopeful that CMS would, when evaluating PROs in
- 8 general, are not necessarily specific to CAR T
- 9 therapy because I think it's broader than that.
- 10 Dr. Basch had noted that he was skeptical of
- 11 the concerns of it being a barrier to implement
- 12 PROs. On the other hand, I can't help but
- 13 notice that that wasn't the position that was
- 14 being suggested by multiple stakeholders, both
- 15 in the background materials we have, the
- 16 presentations today, and anecdotally. I've
- 17 heard such a sentiment before, and I would hope
- 18 that there wouldn't be any barrier to access
- 19 for patients because ultimately, as was just
- 20 said, the patients ultimately are the focus

- 21 here, and if there was a potential barrier for
- 22 a hospital or clinician to providing the CAR T
- 23 therapy for a patient, or whatever therapy that
- 24 might be due to the lack of resources to
- 25 implement the PRO, whether the CMS would have

- 1 some kind of pathway in place, that that type
- 2 of concern could be processed and addressed so
- 3 that those patients wouldn't be detrimentally
- 4 affected by a PRO being implemented, and that
- 5 you would just get the gains from PRO, not that
- 6 kind of unfortunate unintended trickle down
- 7 consequence.
- 8 DR. ROSS: I think it's an important
- 9 point to be cautious. I would be very
- 10 surprised if there was any hospital or
- 11 facility, a place that could perform CAR T and
- 12 couldn't collect PROs, it's just --
- MR. FRANKEL: That's basically what
- 14 was presented.
- DR. ROSS: I understand. And I just
- 16 wanted to say, Dr. Goss, to my knowledge, and I
- 17 thought about this, I do not think PROs are
- 18 required as part of an oncology approval or any

- 19 other FDA regulatory action. Our FDA colleague
- 20 has left us, but I just wanted to make sure
- 21 that was correct.
- So, we've basically chatted for an
- 23 hour, we're a little bit ahead of schedule, but
- 24 I think now is the time when we're going to get
- 25 ready to call a motion to vote. Is there

- 1 anything formal that has to happen?
- 2 MS. JENSEN: So, not necessarily
- 3 formal, but I just want to go on record. We
- 4 are planning on doing this vote different than
- 5 we have done in the past, not in the voting,
- 6 but just that they're not going to record it on
- 7 their phones or with an electronic device.
- 8 We're going to, the panel will be saying their
- 9 name and their vote, we will record it, you
- 10 will see it behind us just because, we're doing
- 11 this because we thought we might run out of
- 12 time and there are 23 questions.
- I also wanted to go on record to say
- 14 the official vote is the piece of paper that
- 15 the panelists give us, so when we are done with
- 16 this meeting we will take those papers, we will

- 17 compare with what we have here and make sure
- 18 that it's accurate before we post it on our
- 19 website.
- 20 So before we continue, I want to make
- 21 sure the panel is okay with moving forward and
- 22 how we're going to vote, and that you say your
- 23 name and give us your vote, we'll record it.
- 24 It's supposed to be put on behind us, are
- 25 they -- okay, good. So, go ahead.

- 1 DR. GOSS: One question on the ballot.
- 2 MS. JENSEN: Sure.
- 3 DR. GOSS: So question number -- are
- 4 we going to answer each question and go through
- 5 the vote on each question, because question
- 6 number two really is contingent on the vote on
- 7 question one, so is that an average score of
- 8 2.5 for my scoring, or the average of 2.5 for
- 9 the group scoring is required before we would
- 10 vote on number two?
- DR. ROSS: The group scoring.
- DR. FEINGLASS: So we will be going
- 13 through them one by one.
- DR. ROSS: I think it will be easier

- 15 to go one by one. I'm going to just read the
- 16 questions from the beginning to make sure we're
- 17 all on the same page, give everyone a chance to
- 18 just think them through, and --
- 19 DR. YANG: One other clarification.
- DR. ROSS: Yes, of course.
- 21 DR. YANG: With respect to section
- 22 five, question B, the how confident are we that
- 23 any of those studies in these populations,
- 24 you're talking about usual care versus a
- 25 protocol-driven intervention. Is that a

- 1 randomized trial you're talking about
- 2 predominantly?
- 3 DR. ROSS: Correct, that is my
- 4 understanding of the question.
- 5 DR. YANG: Okay.
- 6 DR. ROSS: So, on May 16, 2018, CMS
- 7 opened a national coverage determination on
- 8 CAR T-cell therapy for Medicare beneficiaries
- 9 with advanced cancer. As part of this NCD
- 10 analysis, MEDCAC will review the evidence
- 11 specific to PROs. We are seeking
- 12 recommendations from the MEDCAC panel regarding

- 13 how existing PRO assessment tools should be
- 14 incorporated into future clinical studies,
- 15 including future clinical studies on CAR T-cell
- 16 therapy.
- 17 I think just as a side note, we've
- 18 discussed future clinical studies in the
- 19 oncology space and I think we've come to that
- 20 as an agreement or expectation that we're
- 21 talking about oncology studies specifically,
- 22 including CAR T-cell therapy studies.
- The MEDCAC will focus on specific PRO
- 24 assessment tools and important characteristics
- 25 of a PRO assessment tool.

- 1 Then we are going to assess whether
- 2 the scientific evidence supports a specific
- 3 number of outcome assessment studies, design
- 4 characteristics, study duration, and suitable
- 5 controls for applying PROs to health outcomes
- 6 research. This meeting will explore these
- 7 challenges. And just to note, MEDCAC panels do
- 8 not make coverage determinations but CMS
- 9 benefits from their advice.
- 10 So, voting questions. For each voting

- 11 question, please use the following scale
- 12 identifying your level of confidence, with a
- 13 score of one being low or no confidence, and
- 14 five representing high confidence, so it's a
- 15 scale of one to five, and I'll go one by one.
- Question 1.a. How confident are you
- 17 that the PRO-CTCAE, the Patient-Reported
- 18 Outcomes Common Terminology Criteria for
- 19 Adverse Events, is valid and generalizable to
- 20 the Medicare population?
- DR. CUYJET: Al Cuyjet, I'm going to
- 22 vote three.
- DR. CHENG: Joe Cheng, vote four.
- DR. CIVIC: Diane Civic, four.
- MR. FRANKEL: Naftali Frankel, three.

- 1 DR. GARRIDO: Melissa Garrido, three.
- 2 MS. ELLIS: Can you excuse me one
- 3 second?
- 4 DR. ROSS: Can we start from the
- 5 beginning?
- 6 DR. CUYJET: Al Cuyjet, I voted three
- 7 on question 1.a.
- 8 DR. CHENG: Joe Cheng, vote four.

- 9 DR. CIVIC: Diane Civic, four.
- MR. FRANKEL: Naftali Frankel, three.
- DR. GARRIDO: Melissa Garrido, three.
- DR. GOSS: Tom Goss, three.
- DR. JAMES: Tom James, four.
- DR. LAMON: Joel Lamon, four.
- DR. PERISSINOTTO: Carla Perissinotto,
- 16 four.
- 17 DR. FEINGLASS: Shami Feinglass,
- 18 three.
- 19 DR. GOTTSCHALK: Steve Gottschalk,
- 20 four.
- 21 DR. OLSON: Doug Olson, four.
- DR. YANG: Jim Yang, three.
- DR. ROSS: Question 1.b, how confident
- 24 are you that the M.D. Anderson Symptom
- 25 Inventory is valid and generalizable to the

- 1 Medicare population?
- 2 DR. CUYJET: Al Cuyjet, I vote four.
- 3 DR. CHENG: Joe Cheng, three.
- 4 DR. CIVIC: Diane Civic, three.
- 5 MR. FRANKEL: Naftali Frankel, three.
- 6 DR. GARRIDO: Melissa Garrido, three.

- 7 DR. GOSS: Tom Goss, four.
- 8 DR. JAMES: Tom James, four.
- 9 DR. LAMON: Joel Lamon, four.
- 10 DR. PERISSINOTTO: Carla Perissinotto,
- 11 three.
- DR. FEINGLASS: Shami Feinglass,
- 13 three.
- DR. GOTTSCHALK: Steve Gottschalk,
- 15 three.
- DR. OLSON: Doug Olson, four.
- 17 DR. YANG: Jim Yang, four.
- DR. ROSS: Okay, question 1.c. How
- 19 confident are you that the European
- 20 Organization for Research and Treatment of
- 21 Cancer Quality of Life Questionnaire, the
- 22 EORTC-QLC-C30 core questionnaire, is valid and
- 23 generalizable to the Medicare population?
- DR. CUYJET: Al Cuyjet, three.
- DR. CHENG: Joe Cheng, four.

- 1 DR. CIVIC: Diane Civic, four.
- 2 MR. FRANKEL: Naftali Frankel, three.
- 3 DR. GARRIDO: Melissa Garrido, four.
- 4 DR. GOSS: Tom Goss, five.

- 5 DR. JAMES: Tom James, five.
- 6 DR. LAMON: Joel Lamon, four.
- 7 DR. PERISSINOTTO: Carla Perissinotto,
- 8 four.
- 9 DR. FEINGLASS: Shami Feinglass, four.
- 10 DR. GOTTSCHALK: Steve Gottschalk,
- 11 four.
- DR. OLSON: Doug Olson, four.
- DR. YANG: Jim Yang, four.
- DR. ROSS: Question 1.d, how confident
- 15 are you that the University of Washington
- 16 Quality of Life, UW-QOL, is valid and
- 17 generalizable to the Medicare population?
- DR. CUYJET: Al Cuyjet, I voted two.
- 19 DR. CHENG: Joe Cheng, two.
- DR. CIVIC: Diane Civic, two.
- 21 MR. FRANKEL: Naftali Frankel, one.
- DR. GARRIDO: Melissa Garrido, one.
- DR. GOSS: Tom Goss, one.
- DR. JAMES: Tom James, two.
- DR. LAMON: Joel Lamon, two.

- 1 DR. PERISSINOTTO: Carla Perissinotto,
- 2 one.

- 3 DR. FEINGLASS: Shami Feinglass, two.
- 4 DR. GOTTSCHALK: Steve Gottschalk,
- 5 two.
- 6 DR. OLSON: Doug Olson, two.
- 7 DR. YANG: Jim Yang, one.
- 8 DR. ROSS: Question 1.e. How
- 9 confident are you that the Patient-Reported
- 10 Outcome Measurement Information System or
- 11 PROMIS, is valid and generalizable to the
- 12 Medicare population?
- DR. CUYJET: Al Cuyjet, four.
- DR. CHENG: Joe Cheng, five.
- DR. CIVIC: Diane Civic, four.
- MR. FRANKEL: Naftali Frankel, five.
- 17 DR. GARRIDO: Melissa Garrido, four.
- DR. GOSS: Tom Goss, three.
- DR. JAMES: Tom James, five.
- DR. LAMON: Joel Lamon, four.
- 21 DR. PERISSINOTTO: Carla Perissinotto,
- 22 five.
- 23 DR. FEINGLASS: Shami Feinglass,
- 24 three.
- DR. GOTTSCHALK: Steve Gottschalk,

- 1 four.
- 2 DR. OLSON: Doug Olson, four.
- 3 DR. YANG: Jim Yang, four.
- 4 DR. ROSS: Question 1.f. How
- 5 confident are you that the Electronic
- 6 Self-Report-Cancer, ESRA-C, is valid and
- 7 generalizable to the Medicare population.
- 8 DR. CUYJET: Al Cuyjet, two.
- 9 DR. CHENG: Joe Cheng, two.
- DR. CIVIC: Diane Civic, one.
- 11 MR. FRANKEL: Naftali Frankel, one.
- DR. GARRIDO: Melissa Garrido, one.
- DR. GOSS: Tom Goss, two.
- DR. JAMES: Tom James, two.
- DR. LAMON: Joel Lamon, two.
- DR. PERISSINOTTO: Carla Perissinotto,
- 17 two.
- DR. FEINGLASS: Shami Feinglass, one.
- 19 DR. GOTTSCHALK: Steve Gottschalk,
- 20 two.
- 21 DR. OLSON: Doug Olson, one.
- DR. YANG: Jim Yang, one.
- DR. ROSS: And the final, question
- 24 1.g, how confident are you that the Functional
- 25 Living Index for Cancer, or FLIC, is valid and

- 1 generalizable to the Medicare population?
- 2 DR. CUYJET: Al Cuyjet, two.
- 3 DR. CHENG: Joe Cheng, two.
- 4 DR. CIVIC: Diane Civic, one.
- 5 MR. FRANKEL: Naftali Frankel, one.
- 6 DR. GARRIDO: Melissa Garrido, one.
- 7 DR. GOSS: Tom Goss, two.
- 8 DR. JAMES: Tom James, one.
- 9 DR. LAMON: Joel Lamon, two.
- 10 DR. PERISSINOTTO: Carla Perissinotto,
- 11 one.
- DR. FEINGLASS: Shami Feinglass, one.
- DR. GOTTSCHALK: Steve Gottschalk,
- 14 one.
- DR. OLSON: Doug Olson, one.
- DR. YANG: Jim Yang, two.
- 17 DR. ROSS: Great. So before we move
- 18 on to the next section of questions, each panel
- 19 member does have an opportunity to state for
- 20 the record why they voted the way they voted,
- 21 or if they want to explain any of the intention
- 22 behind their vote.
- MR. FRANKEL: On just PROMIS, the one
- 24 trend that stuck out listening to the different
- 25 stakeholders was, that was the common thread, I

- 1 think, from across the board, where it was
- 2 either, even those that aren't very
- 3 enthusiastic about PROs in general noted that
- 4 PROMIS was recommended and it was in that
- 5 context. So there was, if I'm not mistaken,
- 6 that was, had the broadest consensus among the
- 7 speakers and different stakeholders today.
- 8 DR. ROSS: Do any other panel members
- 9 have comments?
- DR. YANG: I think it's not only to
- 11 win, but whether they're adequate in and of
- 12 themselves that is deeply important so, you
- 13 know, the range of your vote matters too.
- MS. JENSEN: Can you state your name
- 15 for the record for that last comment, please.
- DR. YANG: Jim Yang.
- 17 MS. JENSEN: Thank you.
- DR. GOSS: Just one last quick
- 19 comment, Tom Goss. For the PRO-CTCAE, I was
- 20 concerned about the respondent burden there for
- 21 many items, and I was unclear on how it's
- 22 useful. It sounded like people are using bits
- 23 and pieces of it, and I think that when you cut

- 24 something up that was developed as a whole,
- 25 that undermines some of the validity

- 1 potentially.
- 2 DR. ROSS: Are we allowed to take
- 3 comments at this point in response?
- 4 MS. JENSEN: One. Go ahead.
- 5 DR. BASCH: It was actually developed
- 6 as a library, so each individual item is
- 7 validated individually, so it's not meant to be
- 8 used, so actually the purpose is for people to
- 9 use little pieces of it, you know, anywhere
- 10 between, you know, one and, you know, as many
- 11 as you want.
- MS. JENSEN: What's your name?
- DR. BASCH: Ethan Basch.
- DR. ROSS: Thank you, Dr. Basch.
- Okay. Four of the PRO assessments
- 16 were rated as a 2.5 or higher. That's the
- 17 PRO-CTCAE, the MDASI -- is that how you say it
- 18 -- MDASI, the EORTC-QLQ-C30, and PROMIS.
- 19 Whoever invented PROMIS, they had a good
- 20 thought in mind, marketing in mind.
- 21 So we now move on to question number

- 22 two, which is, considering those four PRO
- 23 assessments with greater than or equal to 2.5,
- 24 we're going to vote whether or not those
- 25 assessments -- it says combined, but are we

- 1 considering them independently? I'm looking to
- 2 the CMS team to make sure that the wording is
- 3 right.
- 4 (Inaudible discussion.)
- 5 DR. ROSS: So it will be all four of
- 6 those.
- 7 DR. FEINGLASS: Josh, can I clarify
- 8 one thing?
- 9 DR. ROSS: It's Joe, but yes.
- 10 DR. FEINGLASS: Joe, sorry.
- DR. ROSS: That's fine.
- DR. FEINGLASS: So my clarification is
- 13 on age, and one thing we didn't discuss before,
- 14 I believe that many of these that we've now
- 15 picked were designed for adults, and so when
- 16 we're asking this question of not sensitive to
- 17 difference of age, can we make an assumption
- 18 there that we're not talking about pediatrics?
- 19 DR. GOSS: Actually I don't think so,

- 20 because one of the studies showed that even in
- 21 the pediatrics, they were Medicare
- 22 beneficiaries, some 25 percent of the patients
- 23 had Medicare, presumably because they were
- 24 disabled because of their illness.
- DR. FEINGLASS: So the reason I'm

- 1 asking is because it potentially changes some
- 2 people's votes, because if you're looking at
- 3 who is sensitive to age, if they're only
- 4 designed for someone over the age of 18, that
- 5 impacts it. So can we make, for the purposes
- 6 of the panel in voting, can we make an
- 7 assumption that we're looking at focus on the
- 8 Medicare age?
- 9 DR. ROSS: Yes, I believe we are
- 10 making the assumption that we are considering
- 11 the use for Medicare beneficiaries with cancer.
- DR. YANG: The other wording,
- 13 available supporting evidence, do you mean
- 14 available or sufficient?
- 15 UNIDENTIFIED PANELIST: Adequate.
- DR. ROSS: I think it fits our job to
- 17 say whether it's sufficient.

- 18 DR. YANG: Should that word be
- 19 available or adequate? Because available means
- 20 any evidence.
- DR. ROSS: Would the CMS team like to
- 22 respond?
- DR. SZARAMA: Any evidence.
- DR. ROSS: Any evidence, okay. Thank
- 25 you.

- 1 DR. CIVIC: And then like for A, are
- 2 we adding them all up, or each one has to stand
- 3 on its own?
- 4 MS. JENSEN: So it's a single vote.
- 5 DR. CIVIC: No, I know that, but is it
- 6 additive or, you know what I mean?
- 7 MS. JENSEN: Well, it is how the panel
- 8 wants to interpret it, the questions are the
- 9 questions, but you're making a single vote,
- 10 realizing you're taking the four that you've
- 11 done 2.5 or higher and saying whether, yes or
- 12 no collectively on that.
- DR. ROSS: So conceptually it's a
- 14 challenging exercise, to consider all four PRO
- 15 assessment tools and whether any, yes-no, will

- 16 meet these criteria.
- So, does the panel need me to restate
- 18 the four that we're voting on, or is everybody
- 19 on board? Okay.
- 20 So question A, the characteristic is
- 21 the breadth of measures in emotional, social
- 22 and physical well-being, yes-no.
- DR. CUYJET: Al Cuyjet, yes.
- DR. CHENG: Joe Cheng, yes.
- DR. CIVIC: Diane Civic, yes.

- 1 MR. FRANKEL: Naftali Frankel, yes.
- 2 DR. GARRIDO: Melissa Garrido, yes.
- 3 DR. GOSS: Tom Goss, yes.
- 4 DR. JAMES: Tom James, yes.
- 5 DR. LAMON: Joel Lamon, yes.
- 6 DR. PERISSINOTTO: Carla Perissinotto,
- 7 yes.
- 8 DR. FEINGLASS: Shami Feinglass, yes.
- 9 DR. GOTTSCHALK: Steve Gottschalk,
- 10 yes.
- DR. OLSON: Doug Olson, yes.
- DR. YANG: Jim Yang, yes.
- DR. ROSS: 2.B, quick throughput to

- 14 apply to clinical study.
- DR. CUYJET: Al Cuyjet, yes, again.
- DR. CHENG: Joe Cheng, yes.
- DR. CIVIC: Diane Civic, yes.
- MR. FRANKEL: Naftali Frankel, yes.
- 19 DR. GARRIDO: Melissa Garrido, yes.
- DR. GOSS: Tom Goss, yes.
- DR. JAMES: Tom James, yes.
- DR. LAMON: Joel Lamon, yes.
- DR. PERISSINOTTO: Carla Perissinotto,
- 24 yes.
- DR. FEINGLASS: Shami Feinglass, yes.

- 1 DR. GOTTSCHALK: Steve Gottschalk,
- 2 yes.
- 3 DR. OLSON: Doug Olson, yes.
- 4 DR. YANG: Jim Yang, yes.
- 5 DR. ROSS: 2.C, transferable to
- 6 community practice settings.
- 7 DR. CUYJET: Al Cuyjet, yes.
- 8 DR. CHENG: Joe Cheng, yes.
- 9 DR. CIVIC: Diane Civic, yes.
- 10 MR. FRANKEL: Naftali Frankel, yes.
- 11 DR. GARRIDO: Melissa Garrido, yes.

- DR. GOSS: Tom Goss, yes.
- DR. JAMES: Tom James, yes.
- DR. LAMON: Joel Lamon, yes.
- DR. PERISSINOTTO: Carla Perissinotto,
- 16 yes.
- 17 DR. FEINGLASS: Shami Feinglass, yes.
- DR. GOTTSCHALK: Steve Gottschalk,
- 19 yes.
- DR. OLSON: Doug Olson, yes.
- 21 DR. YANG: Jim Yang, yes.
- DR. ROSS: 2.D, measures are not
- 23 sensitive to differences in age.
- DR. CUYJET: Al Cuyjet, with the
- 25 clarification, yes.

- 1 DR. CHENG: Joe Cheng, no.
- 2 DR. CIVIC: Diane Civic, yes.
- 3 MR. FRANKEL: Naftali Frankel, yes.
- 4 DR. GARRIDO: Melissa Garrido, yes.
- 5 DR. GOSS: Tom Goss, yes.
- 6 DR. JAMES: Tom James, yes.
- 7 DR. LAMON: Joel Lamon, yes.
- 8 DR. PERISSINOTTO: Carla Perissinotto,
- 9 yes.

- 10 DR. FEINGLASS: Shami Feinglass, yes.
- DR. GOTTSCHALK: Steve Gottschalk, no.
- DR. OLSON: Doug Olson, yes.
- DR. YANG: Jim Yang, no.
- DR. ROSS: Question 2.E, measures are
- 15 not sensitive to line of therapy.
- DR. CUYJET: Al Cuyjet, yes again.
- 17 DR. CHENG: Just a point of
- 18 clarification. So this is a double negative,
- 19 so we're saying it is sensitive to line of
- 20 therapy?
- 21 MS. JENSEN: Correct.
- DR. CHENG: Then no.
- DR. ROSS: No, no, the measures are
- 24 not sensitive to line of therapy. It doesn't
- 25 matter which line of therapy they're receiving,

- 1 but PRO is still a valid assessment.
- 2 You're voting no?
- 3 DR. CHENG: I'm saying it's a double
- 4 negative, so if I'm saying that PROs are
- 5 sensitive to a line of therapy, the vote is no.
- 6 DR. ROSS: Right.
- 7 DR. CHENG: Then Joe Cheng, no.

- 8 DR. CIVIC: Diane Civic, yes.
- 9 MR. FRANKEL: Naftali Frankel, yes.
- 10 DR. GARRIDO: Melissa Garrido, yes.
- DR. GOSS: Tom Goss, yes.
- DR. JAMES: Tom James, yes.
- DR. LAMON: Joel Lamon, yes.
- DR. PERISSINOTTO: Carla Perissinotto,
- 15 yes.
- DR. FEINGLASS: Shami Feinglass, yes.
- 17 DR. GOTTSCHALK: Steve Gottschalk, no.
- DR. OLSON: Doug Olson, no.
- DR. YANG: Jim Yang, no.
- DR. ROSS: Okay, 2.F, the measures are
- 21 not sensitive to comorbidities.
- DR. CUYJET: Al Cuyjet, yes.
- DR. CHENG: Joe Cheng, no.
- DR. CIVIC: Diane Civic, no.
- MR. FRANKEL: Naftali Frankel, yes.

- 1 DR. GARRIDO: Melissa Garrido, yes.
- 2 DR. GOSS: Tom Goss, yes.
- 3 DR. JAMES: Tom James, yes.
- 4 DR. LAMON: Joel Lamon, yes.
- 5 DR. PERISSINOTTO: Carla Perissinotto,

- 6 yes.
- 7 DR. FEINGLASS: Feinglass, yes.
- 8 DR. GOTTSCHALK: Steve Gottschalk, no.
- 9 DR. OLSON: Doug Olson, yes.
- 10 DR. YANG: Jim Yang, no.
- DR. ROSS: Question 2.G, measures are
- 12 generalizable to studies of combinations of
- 13 therapies.
- DR. CUYJET: Al Cuyjet, yes, again.
- DR. CHENG: Joe Cheng, yes.
- DR. CIVIC: Diane Civic, yes.
- 17 MR. FRANKEL: Naftali Frankel, yes.
- DR. GARRIDO: Melissa Garrido, yes.
- 19 DR. GOSS: Tom Goss, yes.
- DR. JAMES: Tom James, yes.
- 21 DR. LAMON: Joel Lamon, yes.
- DR. PERISSINOTTO: Carla Perissinotto,
- 23 yes.
- DR. FEINGLASS: Feinglass, yes.
- DR. GOTTSCHALK: Steve Gottschalk,

- 1 yes.
- 2 DR. OLSON: Doug Olson, yes.
- 3 DR. YANG: Jim Yang, yes.

- 4 DR. ROSS: And the last question, 2.H,
- 5 used in net benefit analysis based on symptom
- 6 burden and well-being.
- 7 DR. CUYJET: Al Cuyjet, yes, again.
- 8 DR. CHENG: Joe Cheng, yes.
- 9 DR. CIVIC: Diane Civic, no.
- 10 MR. FRANKEL: Naftali Frankel, yes.
- 11 DR. GARRIDO: Melissa Garrido, yes.
- DR. GOSS: Tom Goss, yes.
- DR. JAMES: Tom James, yes.
- DR. LAMON: Joel Lamon, no.
- DR. PERISSINOTTO: Carla Perissinotto,
- 16 yes.
- 17 DR. FEINGLASS: Feinglass, yes.
- DR. GOTTSCHALK: Steve Gottschalk,
- 19 yes.
- DR. OLSON: Doug Olson, yes.
- DR. YANG: Jim Yang, yes.
- DR. ROSS: Again, I'd like to open it
- 23 up to give panel members an opportunity to
- 24 explain their vote or any of the information
- 25 they want to state for the record.

1 Dr. Garrido.

- 2 DR. GARRIDO: This is Melissa Garrido.
- 3 I used a very minimal standard, so if any of
- 4 the PROs had any of the evidence, I voted yes.
- 5 DR. GOSS: Tom Goss. I would say the
- 6 same thing. My assumption was that if in the
- 7 aggregate either one of them covered it, then
- 8 the answer had to be yes.
- 9 DR. JAMES: I'm Tom James with
- 10 B and C. Specifically we've heard from some of
- 11 the health systems that there were
- 12 difficulties, but we heard from others that
- 13 they have been able to achieve those, so that's
- 14 why I voted yes, I think it's possible.
- DR. ROSS: Any other panel members
- 16 want to make a comment?
- 17 DR. FEINGLASS: One thing I neglected
- 18 to state at the very opening of this meeting,
- 19 which is probably obvious to all industry in
- 20 here, but my comments reflect the all-industry
- 21 point of view, they do not reflect any
- 22 individual company's view.
- DR. ROSS: Stated for the record.
- DR. GOTTSCHALK: Steve Gottschalk. I
- 25 just want to state for D, since I'm the only

- 1 pediatrician on the panel, I think they are age
- 2 sensitive, and we need PRO measurements
- 3 specifically for pediatric patients.
- 4 DR. ROSS: Okay. We have two
- 5 discussion questions to address before we move
- 6 on. Just to state to the panel explicitly, are
- 7 there PRO assessments other than those listed
- 8 in question one that have adequately stated
- 9 evidence-based criteria and processes that you
- 10 would want to raise, bring to the attention of
- 11 CMS for further consideration? Then, are there
- 12 additional desired characteristics other than
- 13 listed in question two that you believe should
- 14 be taken into consideration? They're not voted
- 15 on, these are discussion questions for the
- 16 panel members, if people have responses.
- 17 DR. GOSS: So, a couple quick things.
- 18 I would say -- this is Tom Goss -- I think that
- 19 the FACT has been used, and it has a number of
- 20 condition-specific measures that I think have
- 21 been validated in a variety of cancer types.
- And I would also say that the EORTC
- 23 has a number of tumor-specific add-on modules
- 24 that I would encourage CMS to evaluate them as
- 25 far as their utility for specific conditions.

- 1 DR. CHENG: I would just make a
- 2 comment that we need to look at the PROs in a
- 3 context of the presenting episode of care. So
- 4 for example, someone made allusion to using,
- 5 you know, CAR T therapy in the future for
- 6 multiple myeloma, but if the patient, for
- 7 example, had a pathological spine fracture with
- 8 spinal cord compression or injury, they would
- 9 certainly need a different type of assessment
- 10 based on metastatic spine disease or their
- 11 presenting episode of care, compared to using
- 12 what we're talking about today as well.
- DR. CUYJET: Okay, Al Cuyjet, I'll
- 14 just make a comment, it might sound like a
- 15 broken record, but I'm looking out at the
- 16 audience, I might see a couple millennials and
- 17 no Gen-Z around, so these patient-reported
- 18 outcome tools have been developed by boomers
- 19 and older. I think the technology is available
- 20 to enable us to do a better job of collecting
- 21 information, and I'll leave it at that.
- DR. FEINGLASS: Shami Feinglass. The
- 23 two things I'd add are from a diversity and
- 24 inclusion standpoint in clinical trials. One

- 1 now know when he stands up at the mic, are the
- 2 availability of language translations, I think
- 3 is really important. And as you look at
- 4 developing, those of you in the room who are
- 5 developing more patient-reported outcome
- 6 assessment tools, is there diversity and
- 7 inclusion in the people that you're looking at
- 8 when you're putting them, asking them those
- 9 questions, are those questions relevant to them
- 10 from a diversity and inclusion standpoint? So
- 11 to be specific, gender, cultural, where are
- 12 these people from, what do they identify as,
- 13 what are their languages, can they actually
- 14 answer your questions.
- DR. GOSS: Tom Goss. I would just say
- 16 that I would also suggest that CMS evaluate
- 17 whether or not there are licensing fees for any
- 18 of the measures that we recommend, I think
- 19 there is some variability of some of them. And
- 20 I would also say that it would be important as
- 21 well that, for any of these measures that they
- 22 would consider, clearly the validity of

- 23 translations is important as already noted, and
- 24 I think the -- there was another one, and if I
- 25 think of it, I'll come back to it.

- 1 Oh, respondent burden. I think you
- 2 should always have a sense of the time frame it
- 3 will take to complete it, because the oncology
- 4 patients may be fatigued or having other
- 5 symptoms, so what seems like a short time, but
- 6 it could be a long time, and certainly if
- 7 someone were going through these symptoms and
- 8 you were listing all of that, that would be, I
- 9 think hard.
- 10 DR. GARRIDO: Melissa Garrido. I
- 11 would add an adequate variation in the
- 12 responses, so an absence of other floor and
- 13 ceiling effects.
- DR. ROSS: If we have no additional
- 15 comments, we're going to move on to question
- 16 three. How confident are you that each of the
- 17 following assessment intervals are appropriate
- 18 measurement periods for a valid PRO assessment?
- 19 DR. CUYJET: Al Cuyjet, question 3.a,
- answer one.

- DR. CHENG: Joe Cheng, three.
- DR. CIVIC: Diane Civic, three.
- MR. FRANKEL: Naftali Frankel, three.
- DR. GARRIDO: Melissa Garrido, three.
- DR. ROSS: Pause, pause, sorry.

- 1 So we're talking about 3.a, the variable
- 2 event-dependent frequency interval.
- 3 MS. JENSEN: Yes, Garrido is three.
- 4 DR. GOSS: Tom Goss, one.
- 5 DR. JAMES: Tom James, three.
- 6 DR. LAMON: Joel Lamon, one.
- 7 DR. PERISSINOTTO: Carla Perissinotto,
- 8 one.
- 9 DR. FEINGLASS: Feinglass, one.
- 10 DR. GOTTSCHALK: Steve Gottschalk,
- 11 two.
- DR. OLSON: Doug Olson, three.
- DR. YANG: Jim Yang, four.
- DR. ROSS: Again on a scale of one to
- 15 five, how confident are you in the fixed
- 16 time-dependency frequency interval?
- DR. CUYJET: Al Cuyjet, four.
- DR. CHENG: Joe Cheng, four.

- 19 DR. CIVIC: Diane Civic, four.
- MR. FRANKEL: Naftali Frankel, four.
- 21 DR. GARRIDO: Melissa Garrido, three.
- DR. GOSS: Tom Goss, four.
- DR. JAMES: Tom James, three.
- DR. LAMON: Joel Lamon, five.
- DR. PERISSINOTTO: Carla Perissinotto,

- 1 five.
- 2 DR. FEINGLASS: Feinglass, four.
- 3 DR. GOTTSCHALK: Steve Gottschalk,
- 4 four.
- 5 DR. OLSON: Doug Olson, four.
- 6 DR. YANG: Jim Yang, two.
- 7 DR. ROSS: Okay, question four, again
- 8 a scale of one to five. How confident are you
- 9 that a PRO assessment over the course of the
- 10 following study duration identifies a
- 11 meaningful durable treatment effect with a
- 12 valid PRO? A, six months.
- DR. CUYJET: Two, Al Cuyjet.
- DR. CHENG: Joe Cheng, two, but
- 15 specifically for CAR T.
- DR. CIVIC: Diane Civic, two.

- 17 MR. FRANKEL: Naftali Frankel, two.
- DR. GARRIDO: Melissa Garrido, three.
- 19 DR. GOSS: Tom Goss, two.
- DR. JAMES: Tom James, two.
- 21 DR. LAMON: Joel Lamon, one.
- DR. PERISSINOTTO: Carla Perissinotto,
- 23 two.
- DR. FEINGLASS: Feinglass, two.
- DR. GOTTSCHALK: Steve Gottschalk,

- 1 two.
- 2 DR. OLSON: Doug Olson, three.
- 3 DR. YANG: Jim Yang, three.
- 4 DR. ROSS: Hold on one second. Okay,
- 5 question 4.b, 12 months?
- 6 DR. CUYJET: Al Cuyjet, three.
- 7 DR. CHENG: Joe Cheng, four.
- 8 DR. CIVIC: Diane Civic, three.
- 9 MR. FRANKEL: Naftali Frankel, three.
- 10 DR. GARRIDO: Melissa Garrido, two.
- DR. GOSS: Tom Goss, three.
- DR. JAMES: Tom James, four.
- DR. LAMON: Joel Lamon, four.
- DR. PERISSINOTTO: Carla Perissinotto,

- 15 four.
- DR. FEINGLASS: Feinglass, three.
- 17 DR. GOTTSCHALK: Steve Gottschalk,
- 18 three.
- 19 DR. OLSON: Doug Olson, four.
- DR. YANG: Jim Yang, four.
- DR. ROSS: Question 4.c, 24 months?
- DR. CUYJET: Al Cuyjet, five.
- DR. CHENG: Joe Cheng, five.
- DR. CIVIC: Diane Civic, three.
- MR. FRANKEL: Naftali Frankel, four.

- 1 DR. GARRIDO: Melissa Garrido, one.
- 2 DR. GOSS: Tom Goss, four.
- 3 DR. JAMES: Tom James, five.
- 4 DR. LAMON: Joel Lamon, five.
- 5 DR. PERISSINOTTO: Carla Perissinotto,
- 6 five.
- 7 DR. FEINGLASS: Feinglass, three.
- 8 DR. GOTTSCHALK: Steve Gottschalk,
- 9 four.
- 10 DR. OLSON: Doug Olson, four.
- DR. YANG: Jim Yang, five.
- DR. ROSS: Great. It was my mistake,

- 13 I forgot to ask after question three so I'll do
- 14 them together, questions three and four, I want
- 15 to give panel members an opportunity to explain
- 16 their voting if they would like to state for
- 17 the record anything they took into
- 18 consideration. That's questions three and
- 19 four. Dr. Yang.
- DR. YANG: Jim Yang. For question
- 21 number three, I interpreted that as being based
- 22 on the individual investigator in the study if
- 23 you can pick the cogent times for intervals,
- 24 versus automatic fixed times regardless of
- 25 treatment. Is that a correct interpretation?

- 1 DR. ROSS: Well, my understanding, and
- 2 other members can contribute, is that it's a
- 3 fixed time interval as sort of prespecified at
- 4 one week, at four weeks, at eight weeks, not
- 5 necessarily that you could pick it.
- 6 DR. YANG: Not necessarily picked for
- 7 every study.
- 8 DR. ROSS: Correct.
- 9 DR. YANG: But the other one, that
- 10 would be something where the investigator would

- 11 decide what time intervals were the cogent
- 12 ones, for 3.a?
- DR. ROSS: Yes, the investigator would
- 14 decide that this is the right time to ask the
- 15 PRO.
- DR. GOTTSCHALK: So for 3.b I
- 17 interpreted it could be like for the first
- 18 eight weeks it would be weekly, and then you
- 19 would go to monthly intervals; is that correct?
- DR. ROSS: That is correct.
- 21 DR. GOTTSCHALK: All right.
- DR. CHENG: Yeah. I interpreted it
- 23 with the variable event-dependent, it's just,
- 24 that's the real world situation where the
- 25 patient would come back to clinic at plus or

- 1 minus X number of days or weeks based on the
- 2 follow-up time.
- 3 DR. GOSS: Yeah, I interpreted -- this
- 4 is Tom Goss -- I interpreted that 3.a has, you
- 5 define specific events and then you administer
- 6 the PRO only when those events occur, and if
- 7 the event doesn't happen you don't really need
- 8 the PRO. So the occurrence of an event, say

- 9 neutropenia for example, as opposed to
- 10 standardized set times, and these are
- 11 representative set times, but in any given
- 12 protocol for any particular study, the
- 13 intervals would be defined based on the
- 14 research question at hand. You know, it
- 15 wouldn't always be weekly, it could be
- 16 variable --
- 17 DR. ROSS: As long as it's fixed.
- DR. GOSS: -- at three weeks or four
- 19 weeks, 12 weeks, you know, 26 weeks, 52 weeks.
- DR. ROSS: Right. Do people have any
- 21 other comments they want to make about question
- 22 four, or additional comments about three?
- DR. GARRIDO: Melissa Garrido. My
- 24 diminishing scores with the greater time lines
- 25 reflect a diminishing confidence that we can

- 1 isolate a treatment effect from confounding
- 2 factors over time.
- 3 MR. FRANKEL: On question four, my
- 4 concern was just the lack of data that's
- 5 available at this point in terms of durability,
- 6 you know, it still remains to be seen on the

- 7 time tables that we're talking about if we're
- 8 going to see positive or negative effects. So
- 9 when we're talking about 14 months plus with
- 10 dramatic potential responses, I just figured
- 11 that a longer window of time at this point
- 12 until we see data to say otherwise, is a
- 13 prudent approach. But obviously, we're basing
- 14 our opinions on a real lack of data, so I
- 15 assume this will be reevaluated as more data
- 16 comes in.
- MS. JENSEN: Can you state your name
- 18 just for the record, please?
- 19 MR. FRANKEL: Naftali Frankel.
- MS. JENSEN: Thank you.
- 21 DR. ROSS: Any additional comments
- 22 from the panel members for the record?
- DR. CUYJET: I based my decision
- 24 primarily on that slide that showed the
- 25 longitudinal course for treatment over time, so

- 1 we have to monitor these patients over the
- 2 course, there's going to be a lot of variation
- 3 in this patient population and their responses,
- 4 so we have to look for the responses.

- 5 DR. ROSS: Would you please just
- 6 restate your name?
- 7 DR. CUYJET: Al Cuyjet, I'm sorry.
- 8 DR. YANG: This is Jim Yang, I would
- 9 just like to clarify again. I am not assessing
- 10 this integrating all units of times equally
- 11 like, it was mentioned that with a longer time
- 12 period the effects would diminish if equally
- 13 valued and weighted, that's not the way I was
- 14 interpreting it.
- DR. ROSS: Great. We're going to move
- 16 on to question number five, again, confidence
- 17 on a scale of one to five, how confident are
- 18 you that PRO assessments can provide meaningful
- 19 results when studied with each of the following
- 20 control populations, 5.a, patient him/herself,
- 21 before and after intervention.
- DR. CUYJET: Al Cuyjet, four.
- DR. CHENG: Joe Cheng, four.
- DR. CIVIC: Diane Civic, three.
- MR. FRANKEL: Naftali Frankel, three.

- 1 DR. GARRIDO: Melissa Garrido, three.
- 2 DR. GOSS: Tom Goss, four.

- 3 DR. JAMES: Tom James, three.
- 4 DR. LAMON: Joel Lamon, five.
- 5 DR. PERISSINOTTO: Carla Perissinotto,
- 6 five.
- 7 DR. FEINGLASS: Feinglass, four.
- 8 DR. GOTTSCHALK: Steve Gottschalk,
- 9 four.
- DR. OLSON: Doug Olson, five.
- DR. YANG: Jim Yang, three.
- DR. ROSS: Question 5.B, usual care
- 13 versus a protocol-driven intervention.
- DR. CUYJET: Al Cuyjet, four.
- DR. CHENG: Joe Cheng, four.
- DR. CIVIC: Diane Civic, four.
- 17 MR. FRANKEL: Naftali Frankel, four.
- DR. GARRIDO: Melissa Garrido, three.
- 19 DR. GOSS: Tom Goss, four.
- DR. JAMES: Tom James, four.
- 21 DR. LAMON: Joel Lamon, five.
- DR. PERISSINOTTO: Carla Perissinotto,
- 23 three.
- DR. FEINGLASS: Feinglass, three.
- DR. GOTTSCHALK: Steve Gottschalk,

- 1 four.
- 2 DR. OLSON: Doug Olson, three.
- 3 DR. YANG: Jim Yang, five.
- 4 DR. ROSS: And finally, question 5.C,
- 5 historical control.
- 6 DR. CUYJET: Al Cuyjet, one.
- 7 DR. CHENG: Joe Cheng, two.
- 8 DR. CIVIC: Diane Civic, two.
- 9 MR. FRANKEL: Naftali Frankel, four.
- 10 DR. GARRIDO: Melissa Garrido, two.
- DR. GOSS: Tom Goss, three.
- DR. JAMES: Tom James, two.
- DR. LAMON: Joel Lamon, one.
- DR. PERISSINOTTO: Carla Perissinotto,
- 15 one.
- DR. FEINGLASS: Feinglass, one.
- 17 DR. GOTTSCHALK: Steve Gottschalk,
- 18 one.
- 19 DR. OLSON: Doug Olson, three.
- DR. YANG: Jim Yang, one.
- DR. ROSS: Great, thank you. Does any
- 22 panel member want to state for the record their
- 23 thinking behind their votes?
- DR. CUYJET: Al Cuyjet. I'll just use
- 25 my experience as a clinical investigator in the

- 1 ALLHAT trial, you had to have elevated blood
- 2 pressure to be enrolled whether you were on
- 3 treatment of not. At the end of the study, 85
- 4 percent of our study cohort was at (inaudible)
- 5 blood pressure, so I am a firm believer in
- 6 protocol-driven interventions.
- 7 DR. CHENG: Joe Cheng. For historical
- 8 controls, I think only a few of the PROs like
- 9 PROMIS are able to be cross-walked to other
- 10 historical things like EQ-5D, and so I voted
- 11 down low because some of the other ones we
- 12 chose would not have an easy crosswalk ability.
- DR. FEINGLASS: This is Dr. Feinglass.
- 14 I agree with Dr. Cheng on that.
- DR. ROSS: Great. So I believe we
- 16 have come to the end of our votes. We now have
- 17 an opportunity for a final open panel
- 18 discussion and I have only 20 minutes. Each
- 19 panel member has an opportunity to give their
- 20 final remarks in a maximum of two minutes if we
- 21 could just go in order, and you can decline,
- 22 you don't have to take advantage of this
- 23 opportunity.
- DR. CUYJET: This I think is my last
- 25 MEDCAC meeting, I think I have to take a year

- 1 break, but it's been a very interesting
- 2 experience.
- 3 DR. ROSS: Don't forget your name.
- 4 DR. CUYJET: Al Cuyjet.
- 5 DR. ROSS: I think Dr. Basch has left.
- 6 DR. CUYJET: But it's been great
- 7 participating in all these discussions because
- 8 it's such a wide variety of opinions regarding
- 9 whatever the topic is that we discussed, and
- 10 it's been very refreshing to be engaged and
- 11 involved in it, so I want to thank the MEDCAC.
- DR. CHENG: Joe Cheng. I echo that
- 13 and thank you for all the insight that you've
- 14 given me across the various spectra of this
- 15 topic.
- DR. CIVIC: Yes, this is Diane Civic.
- 17 I really learned a lot today and am glad I
- 18 participated. Just in terms of my own
- 19 experience and the questions, I think I really,
- 20 you know, put a lot more effort into answering
- 21 the first set of questions and looking at the
- 22 specific instruments, and I think, you know,
- 23 the other ones were much harder maybe for a lot

- 24 of us, and based on a lot less data, but we all
- 25 did the best we could.

- MR. FRANKEL: Naftali Frankel. I just
  want to first thank everyone for the great
  presentations and the great discussion amongst
- 4 the panel members. The only thing that I just
- 5 wanted to mention in closing is that when we
- 6 talk about patient-reported outcomes that it's
- 7 really in the singular that we're talking about
- 8 patients as individuals rather than a
- 9 homogeneous population, the patients have
- 10 independent needs and comorbidities and
- 11 different responses. And it's very important,
- 12 I think, that when discussing this general
- 13 topic of patient-reported outcomes, we have to
- 14 always focus on the patient as an individual
- 15 rather than just as a population, and I trust
- 16 that based on the conversations that we had
- 17 today and the discussion that CMS will take
- 18 note of that when evaluating PROs moving
- 19 forward, that obviously, that it's going to be
- 20 considered in that light for patients to be
- 21 empowered with information as well as the

- 22 clinician through that transparent process, but
- 23 the patients can learn from each other, but
- 24 with keeping in mind both from the clinical
- 25 side as well as the patient side, that

- 1 individuals vary greatly from each other.
- 2 Thank you.
- 3 DR. GARRIDO: Melissa Garrido. Thank
- 4 you to all of the speakers today for very
- 5 informative and helpful presentations. I think
- 6 improving PROs is a very worthwhile endeavor.
- 7 I just think we should use extreme caution when
- 8 trying to infer any causal relationship between
- 9 PROs and the various treatments that may be
- 10 considered.
- 11 DR. GOSS: Tom Goss. Thanks for
- 12 letting me participate. It's been very
- 13 interesting and I appreciate all the
- 14 presentations made by the experts, they were
- 15 very informative and helped us to really
- 16 understand some of these issues in greater
- 17 detail. I think our work is helpful but
- 18 probably not sufficient, because there's some
- 19 open questions remaining, so I hope CMS will

- 20 remain open to any additional information as it
- 21 becomes available, but I love the concept of
- 22 really including the patient voice in patient
- 23 decision-making and assess access to treatment.
- DR. JAMES: Tom James. This is my
- 25 first MEDCAC, so I really appreciated the

- 1 presentations and the opportunity to be here.
- 2 We all come with our own experiences to this
- 3 kind of forum. As a primary care physician
- 4 working with the insurance industry, I work
- 5 with both individuals and populations, but my
- 6 experience is in working with Picker Institute
- 7 and we talk in terms of patient focus, not
- 8 patient centered, because patient centered is
- 9 what is being done to them, patient focus is
- 10 their own preferences. This is a terrific
- 11 first step for CMS moving toward patient
- 12 preferences.
- DR. LAMON: It's my pleasure being
- 14 here. Reading these questions ahead of time
- 15 put me out of my comfort zone, and I appreciate
- 16 all the information. Just as an aside as a
- 17 practicing physician, I trust that medical

- 18 education is still training physicians to treat
- 19 one patient at a time, and all of this needs to
- 20 come up to conform those decisions to that
- 21 care. So I would make a comment to CMS or
- 22 whomever, to say that leaning always on more
- 23 data for people giving services, we need to
- 24 lean on the electronic health record people to
- 25 deliver a record that will allow a seamless way

- 1 that will allow us access to this data, so
- 2 we're no longer in silos buying all this
- 3 equipment that's replaced frequently because
- 4 that is no longer adequate. We've defined what
- 5 we need and now we must demand that it be
- 6 provided for us.
- 7 DR. PERISSINOTTO: Carla Perissinotto.
- 8 I want to echo the comment from my colleague
- 9 here about more use of the EHR in information
- 10 gathering. It's a privilege to be here today,
- 11 I'm very impressed with just the breadth of
- 12 expertise and I think that helped to have a
- 13 very balanced discussion coming from multiple
- 14 viewpoints. I also want to acknowledge that
- 15 it's great to include someone who deals

- 16 specifically with older adults at the moment,
- 17 so thank you for including me.
- DR. FEINGLASS: I wanted to thank the
- 19 patients that are on the panel and in this
- 20 room. It's important to have your view, it's
- 21 important to ground us with that view, so thank
- 22 you for your time and your efforts. In
- 23 addition, I found it very interesting when we
- 24 were talking to our colleague at the FDA about
- 25 the fact that at least in the oncology space

- 1 today, we've heard that no PRO has been used to
- 2 drive a negative decision related to oncology
- 3 at the FDA, so that was interesting.
- 4 Again, I think PROs have promise, real
- 5 promise, no pun intended there. I think it is
- 6 a field that has more development to happen in
- 7 it. We are encouraged in industry by the
- 8 development of the patient-reported outcomes.
- 9 As you've heard, many in industry have used
- 10 PROs in their trials, we think they have a
- 11 purpose, and as we see going forward how these
- 12 are used, we're certainly interested in seeing
- 13 how this field moves forward, so thank you.

- DR. GOTTSCHALK: Yeah, I would like to
- 15 echo the other panel members' comments, I also
- 16 really enjoyed being here, participating, and I
- 17 would like to thank also the speakers. I
- 18 probably have three comments.
- 19 First, my kind of take-home message is
- 20 that PROs are probably not ready for prime time
- 21 to be mandated for experimental therapies like
- 22 CAR T-cell therapy. The second thing, I would
- 23 really encourage that you really take advantage
- 24 of CIBMTR. At least if you look in the stem
- 25 cell transplant arena that really is the most

- 1 robust database to glean outcomes and the
- 2 infrastructure is there, so that would be at
- 3 least a starting place, especially since most
- 4 treating physicians are transplant physicians,
- 5 of CAR T-cell patients, so they're very
- 6 familiar with the data requirements and the
- 7 reporting requirements in this.
- 8 DR. OLSON: It's been a unique
- 9 privilege to be able to participate in
- 10 something like this today and I certainly
- 11 learned a lot, and it was particularly

- 12 gratifying to hear so much focus on the
- 13 patients and what that patient is experiencing,
- 14 and it's, as I said, gratifying to hear that.
- DR. YANG: I'd like to thank everyone
- 16 who presented. I learned that PROs are
- 17 extremely valuable instruments for acquiring
- 18 information that cannot be acquired any other
- 19 way. The follow-on is just as important,
- 20 though, what interventions will eventuate and
- 21 can we demonstrate that those have benefits
- 22 back to the patient who generated those data,
- 23 and that's the piece that I'm looking for
- 24 still.
- DR. ROSS: Then I will conclude by

- 1 just extending my appreciation to all the panel
- 2 members and speakers who volunteered their time
- 3 today. Chairing a meeting like this is
- 4 actually quite exciting in many respects. It's
- 5 the science of really two emerging fields
- 6 coming together. The science of PROs has
- 7 really exploded in the past decade, in no small
- 8 part thanks to PCORI and the efforts of
- 9 investigators who appeared here today, as well

- 10 as the science of cell-based therapy, which is
- 11 due in no small part to the industry colleagues
- 12 who are here, and the scientists at NIH who
- 13 spent, you know, decades doing this work. I
- 14 think both are now sort of coming to the cusp
- 15 of actual clinical practice, which is exciting
- 16 for us. And now as a general interest here
- 17 among others and the geriatricians, we have to
- 18 figure out how is this going to, how can we
- 19 best generate evidence that's going to inform
- 20 decisions not just in very specialized
- 21 treatment centers but much more broadly.
- So I appreciated the opportunity to
- 23 help steer the conversation, keep everyone on
- 24 time. Thank you very much.
- MS. JENSEN: So, let me conclude on

- 1 behalf of CMS and the team, the national
- 2 coverage determination team that's in the front
- 3 row, thank you. Thank you for your
- 4 participation, thank you for all of your
- 5 comments, they are very appreciated.
- 6 And Dr. Cuyjet, let me tell you, you
- 7 don't know yet this is your last MEDCAC,

- 8 because we might have scheduled another one yet
- 9 and haven't told you.
- DR. CUYJET: The sentiment won't
- 11 change.
- MS. JENSEN: We do appreciate all that
- 13 you have done as well on your tenure here. And
- 14 Dr. Ross, thank you for chairing this. This is
- 15 your first MEDCAC ever, and we threw him into
- 16 the deep end to chair it as well, and you have
- 17 done a fabulous job, so thank you for that.
- So just for next steps, very quickly,
- 19 so this is part of our process, part of our
- 20 national coverage determination process. I
- 21 don't know if anyone has heard, but we opened
- 22 up a national coverage determination on CAR T,
- 23 so this is part of that process. You can go to
- 24 our website to know, we have a tracking sheet
- 25 of what the next step is, and our next step is

- 1 the proposed national coverage decision which
- 2 is due in February, end of February, like
- 3 February 27th, right? Many of you may know the
- 4 date. So I think it's due, the proposed is due
- 5 the end of -- there are several pending but I

- 6 think the end of February this one is due, so
- 7 it will be public on or before that date, so
- 8 that is the statutory due date and so we will
- 9 meet that. The final, then, will be due 90
- 10 days after we make the proposed public, so
- 11 those are our next steps.
- Now we're going to take all this back
- 13 and we're going to review everything that the
- 14 panel has said as part of our analysis, this is
- 15 one part, it is not the entire part, and we
- 16 will then start drafting our coverage
- 17 determination and make that public before the
- 18 statutory due date or on the statutory due
- 19 date.
- 20 So again, thank you very much, and
- 21 anything else?
- MS. ELLIS: I just need to collect the
- 23 pre-score sheets from all of the panel members.
- MS. JENSEN: So with that, we're
- 25 concluded, so thank you very much. Safe

- 1 travels, everybody.
- 2 (The meeting adjourned at 3:10 p.m.)

