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ACIC or CPAS information

Efgartigimod for treating generalised myasthenia gravis [ID4003]

Technology appraisal committee D [16 November 2023]

Chair: Megan John

External assessment group: Southampton Health Technologies Assessment Centre

Technical team: Ross Wilkinson, Alan Moore, Jasdeep Hayre

Company: Argenx

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Key issues from ACM1

Recommendation: Efgartigimod is not recommended, within its MA, as an add-on to standard treatment for gMG in adults who test positive for anti-AChR antibodies

Table Key issues

| Issue | Committee's considerations | Updated? |
|--|--|----------|
| Population | Further input needed from clinical experts to help define an appropriate population | Yes |
| Maintenance IVIg | Maintenance IVIg use should be estimated in the population in which efgartigimod would be used | Yes |
| Utility values | The same utility values should be used for the 2 arms | Yes |
| Carer disutilities | Impact would be taken into account qualitatively | Yes |
| Corticosteroid complication costs | Studies identified were not suitable for decision making | Yes |
| Treatment effect after treatment stops | A residual treatment effect plausible but uncertain would prefer more evidence / clinical expert input | Yes |

Additional issues

Table 2 Additional issues

| Issue | Description |
|--------------------------|---|
| Placebo effect | <p>NICE asked the company to comment on the placebo effect observed in the placebo arm of ADAPT</p> <p><u>Company base case assumes:</u></p> <ul style="list-style-type: none">• After 16 weeks the established clinical management cohort return to the baseline health-state distribution and remain in the same health state unless a crisis or death occurs |
| Subcutaneous formulation | <p>The committee are asked to consider the availability of a subcutaneous formulation of efgartigimod</p> |

Efgartigimod (Vyvgart, Argenx)

Table 3: Technology details

| | |
|--------------------------------|--|
| Marketing authorisation | <ul style="list-style-type: none"> Efgartigimod is indicated as an add-on to standard therapy for the treatment of adult patients with gMG who are AChR antibody positive MHRA MA received March 2023 |
| Mechanism of action | <ul style="list-style-type: none"> Efgartigimod is a human IgG1 antibody fragment that binds to the neonatal Fc Receptor, resulting in a reduction in the levels of circulating IgG including pathogenic IgG autoantibodies |
| Administration | <ul style="list-style-type: none"> Efgartigimod is provided as a concentrate for IV infusion The recommended dose is 10 mg/kg as a 1-hour IV infusion administered in cycles of once weekly infusions for 4 weeks Subsequent treatment cycles are administered according to clinical evaluation → The frequency of treatment cycles may vary by patient |
| Price | <ul style="list-style-type: none"> List price: £6,569.73 per 400 mg vial - Treatment cycle: ████████████████████ A simple PAS discount has been agreed for efgartigimod |

Clinical effectiveness recap

Key clinical trial

| | ADAPT (Phase 3, n=167) | ADAPT+ (Phase 3, n=151) |
|--------------|---|---|
| Design | Randomised, double-blind, placebo-controlled | Extension of ADAPT, single-arm, open-label |
| Population | Adults with gMG 129 (77%) were AChR Ab+ | Previously enrolled in ADAPT 111 (74%) were AChR Ab+ |
| Intervention | Efgartigimod 10 mg/kg (IV formulation) | Efgartigimod 10 mg/kg (IV formulation) |
| Comparator | Placebo | N/A |
| Duration | 26-week | 156-week |
| Key outcomes | Proportion of AChR Ab+ patients who were MG-ADL responders in the 1st cycle | Safety and tolerability in the ACHR Ab+ population |
| Locations | 56 sites in 15 countries | - |

n.b. Key exclusion criteria included pregnant and lactating people and people with known seropositivity or who tested positive for an active viral infection

NICE Abbreviations: Ab+, Antibody positive; AChR, Acetylcholine receptor; gMG, Generalised Myasthenia Gravis; IV, Intravenous; MG-ADL, Myasthenia Gravis Activities of Daily Living scale;

Other sources of evidence

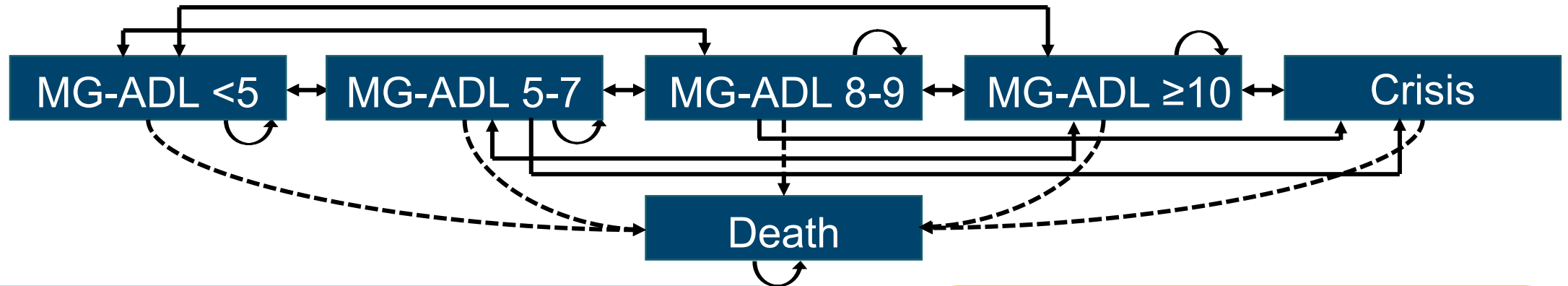
Early access to medicines scheme (EAMS)

- Efgartigimod was granted promising innovative medicine status in November 2021 and a positive scientific opinion by the MHRA under EAMS in May 2022
 - ↳ EAMS made efgartigimod available in the UK from May 2022 until the MHRA MA was granted (March 2023)
 - ↳ EAMS+ makes efgartigimod available for existing and new patients from the point the MA was granted until a recommendation is made by NICE about routine commissioning
- According to the company EAMS/EAMS+ aims to...
 - ↳ Provide access to patients with high unmet medical need
 - ↳ Generate real-world evidence to support HTA discussions and address uncertainty
- EAMS indication: Adults with AChR Ab+ gMG, including patients with refractory gMG who have failed, not tolerated or are ineligible for licensed treatment
- EAMS/EAMS+ data is available for █████ patients from █████ specialist gMG centres in England

Cost effectiveness recap

Company's model overview

Figure Model structure



- State transition model with a lifetime time-horizon and 28-day cycle length
- Treatment effect modelled through transition probabilities
- After a treatment cycle, patients will have at least one cycle with no efgartigimod
- Patients in the MG-ADL<5 health state do not receive efgartigimod

Health states with lower MG-ADL scores are associated with:

- Lower probability of crisis
- Lower corticosteroid and IVIg use
- Lower monitoring costs
- Better QoL
- Lower caregiver disutility

Response to consultation

Consultation responses summary (1)

Consultation comments

Comments received from:

- Argenx (company – manufacturer of efgartigimod)
- ABN – Neuromuscular Advisory Group (Professional group)
- Joint response from Muscular Dystrophy UK (MDUK) and Myaware (Patient groups)
- 2 Consultant Neurologists

Argenx

- Proposed target population for efgartigimod
- Elicited experts estimates of the proportion of the target population that would receive maintenance IVIg
- Provided alternative corticosteroid complication cost estimate
- Presented analysis on caregiver burden and alternative caregiver disutility values
- Identified alternative utility values from the MyRealWorld-MG study
- Provided a clinical expert statement supporting the residual treatment effect assumption
- Answered questions about modelling the ECM arm and a potential placebo effect

Consultation responses summary (2)

ABN – Neuromuscular Advisory Group (endorsed by Royal College of Physicians)

- Stated that clinical trials have shown that efgartigimod is highly efficacious
- Suggested points of use for efgartigimod and EAMS data may inform when efgartigimod should be used / better inform the cost effectiveness estimates than clinical trial data
- Stated that carer support is difficult to evaluate and not appropriate in a MG population

Joint response – MDUK and Myaware (Patient groups)

- Provided responses from patient survey (n=45) on draft guidance
- Concerns: disease burden not fully captured (physical pain, muscle weakness/mobility, steroid side effects, potential development of cataracts, type 2 diabetes, weight gain)
- Some benefits not considered (less travel for treatments, fast acting, novel mechanism)

2 Consultant Neurologists

- Stated that the APADT trial does not reflect who should have efgartigimod on the NHS
- Stated that efgartigimod should be reserved for refractory patients
- Stated that regular IVIg is a relatively uncommon and there is regional variation
- Stated that people with refractory MG often have stopped taking steroids

Key issue: Target population (1)



Committee comments at ACM1

- Input needed from clinical experts to define a population in which efgartigimod is both clinically and cost effective → This population should be clearly defined

Company response to draft guidance

- Delphi panel (6 experts) conducted to gain a consensus on most appropriate NHS target population for efgartigimod
- Proposed target population is easily identifiable in UK specialist centres → Aligns with inclusion criteria for EAMS/EAMS+ and have significant unmet need

EAG comments

- Company proposed target population wording should be revised
 - ↳ People ineligible for standard therapy, appear to fall outside licenced indication unless they are only ineligible for one type of standard therapy but able to receive another standard therapy to which efgartigimod can be added
 - ↳ Proposed alternative population wording – [Link to slide 35](#)
- Believe EAMS patient characteristic data should be used – [Link to slide 36](#)



Key issue: Target population (2)

Table Target population wording

**MHRA
therapeutic
indication**

As an add-on to standard therapy for the treatment of adults with gMG who are AChR antibody positive

**EAMS
therapeutic
indication**

Adults with AChR-antibody seropositive gMG, including adults with refractory gMG who have failed, not tolerated or are ineligible for licensed treatment

**Company
proposed
target
population**

Those with active, refractory disease, with a MG-ADL score ≥ 5 (>50% of MG-ADL score due to non-ocular symptoms), who have failed, not tolerated or are ineligible for standard therapy*.

*Standard therapy includes maximal dose of steroids, and at least 2 additional therapies, such as NSISTs and rituximab, for an adequate period of time, at an adequate dose.

The company responded to the EAGs comments about the use of the word “ineligible” – [Link to slide 35](#)

Key issue: Target population (3)



ABN – Neuromuscular Advisory Group

- EAMS data may be a better source for pathway positions for efgartigimod
- May be sensible to calculate potential cost saving compared to PLEX/IVIg/rituximab usage from EAMS cohort than the whole population
- Efgartigimod could be useful for people with immune-checkpoint therapy-related myasthenia → This would have to be considered in planning at national level

Clinical expert (web comment)

- Efgartigimod should be reserved for refractory patients → Losing the option to prescribe efgartigimod in this population would be detrimental to patient care
- If restricted to people on regular IVIg, a significant cohort would be denied treatment
- ADAPT data does not reflect population who should have efgartigimod in the NHS
↳ Many would have done well with standard treatment



- What population should be included in any potential recommendation?

[Link to slide 36](#)

Key issue: Maintenance IVIg (1)



Committee comments at ACM1

- Proportion of people having maintenance IVIg should reflect the relevant population

Company response to draft guidance

- Used estimates from a Delphi panel (6 experts -from neuromuscular specialist centres)
- Clinicians asked → “Considering the target patient population, what percentage of these patients would be eligible/suitable for regular/maintenance IVIg, assuming no supply issues, and assuming efgartigimod is not available?”
 - ↳ *Assumes no supply issues because IVIg supply chain difficulties are transient*

EAG comments

- Accepts Delphi panel results but believes there is still some uncertainty
- Model remains sensitive to IVIg usage estimates
- MG-ADL \geq 10 health state accrues patients exiting the crisis state
- Delphi panel were not asked what proportion would actually receive IVIg
- Uncertain about the relative percentages that would receive IVIg vs rituximab

Clinical expert (web comment)

- Regular IVIg is relatively uncommon → Many centres use it very infrequently



Key issue: Maintenance IVIg (2)

NICE tech team comments

- Model assumes no QALY benefits of IVIg use
- Concerned IVIg costs are substantially overestimated due to lack of discontinuation

Table Maintenance IVIg utilisation, %

| Category | Maintenance IVIg utilisation* % | | |
|------------|---------------------------------|----------------------------------|-------------------------|
| | EAMS/EAMS+ (ACM1) | Delphi panel (Company Base Case) | Delphi panel (Scenario) |
| MG-ADL<5 | | 0.00 | 0.00 |
| MG-ADL 5–7 | | 50.83 | 69.17 |
| MG-ADL 8–9 | | 68.70 | 69.17 |
| MG-ADL ≥10 | | 85.00 | 69.17 |
| Crisis | 63.3 | 63.3 | 63.3 |
| Overall | | 69.17 | 69.17 |

*IVIg can also be used as a rescue therapy to manage exacerbations and crisis



- Should IVIg be included as a maintenance therapy?
- If yes in which health states and for what proportion of people?

Key issue: Source of utility values (1)



Committee comments at ACM1

- The same utility values should be used in each treatment arm

Company response to draft guidance

Base case updated to include MyRealWorldMG study utilities, applied to both arms

- MyRealWorldMG study
 - ↳ Removes any confounding treatment effect & produces values with greater differentiation between health states
 - ↳ Reflects current UK care as it included a cohort treated with any treatment in current care (Including Immunoglobulins and rituximab)
- Clinical expert suggests that because people in ADAPT were being monitored, it could have resulted in reporting of higher utility values
- Pooling utility values from ADAPT could include some effect of efgartigimod and would likely underestimate the HR-QoL burden at different severity of gMG

NICE tech team comments

- NICE methods guide infers trial values, where available, are preferred
- Choice of utilities has a significant impact on Incremental QALYs

Key issue: Source of utility values (2)



Table Utility values by health state

| Category | Old analysis (ACM1) | | Pooled utility values | |
|--------------------|---------------------|-------|-----------------------|---------------|
| | Efgartigimod | ECM | ADAPT | MyRealWorldMG |
| MG-ADL<5 | 0.828 | 0.723 | 0.781 | 0.802 |
| MG-ADL 5–7 | 0.769 | 0.664 | 0.717 | 0.668 |
| MG-ADL 8–9 | 0.696 | 0.591 | 0.641 | 0.589 |
| MG-ADL ≥10 | 0.618 | 0.513 | 0.557 | 0.465 |
| Crisis | 0.463 | 0.463 | 0.463 | 0.463 |

EAG comments

- Both MyRealWorldMG and ADAPT populations are different to the new proposed target population, so neither is suitable
- MyRealWorldMG study is likely to be at high risk of bias
- Utility values from EAMS/EAMS+ or the subgroup of patients in ADAPT that reflect new proposed target population would be more appropriate



• Which utility values should be used for decision making?

Key issue: Caregiver disutility (1)



Committee comments at ACM1

- Carer disutilities contributed substantially to overall modelled QALY gain
- Carer disutilities not appropriate without further evidence → Considered qualitatively

Company response to draft guidance

Base case updated to include alternative caregiver utility decrements

- Caregiver EQ-5D data obtained from MRWVG study and a paper-based survey in France → EQ-5D was valued using a UK value set
- Utility values generally declined with severity of patient's MG; however no linear relationship found
 - ↳ Likely additional factors are affecting caregiver HR-QoL

EAG comments

- Sample size was small (N=39, 0 from the UK) and people were self-selecting
- Study did not contain a matched control group, so cannot determine if utility decrements are only due to caregiving

[Link to slide 38](#)



Key issue: Caregiver disutility (2)

Table Patient / caregiver utilities and caregiver utility decrements from the new analysis

| Category | Mean utility from 2 studies* | | | | Caregiver utility decrements | |
|------------|------------------------------|--------|-----------|--------|------------------------------|---------------------|
| | Patient | (n=39) | Caregiver | (n=37) | New analysis | Old analysis (ACM1) |
| MG-ADL<5 | 0.786 | 16 | 0.812 | 16 | -0.025 | -0.002 |
| MG-ADL 5–7 | 0.577 | 10 | 0.622** | 9 | -0.240** | -0.045 |
| MG-ADL 8–9 | 0.597 | 4 | 0.725 | 4 | -0.142 | -0.142 |
| MG-ADL ≥10 | 0.352 | 9 | 0.692 | 8 | -0.170 | -0.160 |
| Crisis | - | - | - | - | -0.170*** | -0.180 |

* MRWVG & A paper-based survey in France **Excluding one outlier *** Assumed the same as MGADL≥10

NICE tech team comments

- Mean patient utility values from the 2 studies differ from those from ADAPT and MRWVG (E.g. MG-ADL ≥10: 2 studies = 0.352, MRWVG = 0.465 , ADAPT = 0.557)

ABN – Neuromuscular Advisory Group

- Comparison of carer support is difficult to evaluate and not really appropriate in MG



NICE

- Should caregivers' utility be included in the QALY calculation?
- If yes are the company's caregiver decrements appropriate for decision making?

Abbreviations: ABN, Association of British Neurologists; ACM, Appraisal committee meeting; EAG, External assessment group; HRQoL, Health-related quality of life; MG, Myasthenia Gravis; MG-ADL, Myasthenia Gravis Activities of Daily Living scale; MRWVG, MyRealWorldMG;

Key issue: Corticosteroid complication costs



Committee comments at ACM1

- None of the studies identified were suitable for decision making

Company response to draft guidance

Base case updated to include updated costs of corticosteroid use complications

- Paper by Lee et al. 2018 provides evidence directly from people with gMG
- Estimated annual cost of corticosteroid related complications was £13,131.60

EAG comments

Base case includes no corticosteroid use complication costs

- Company's estimates are not fit for purpose and lack face and methodology validity
 - ↳ Has several concerns → [Link to slide 40](#)

Clinical expert (web comment)

- People with treatment refractory MG have often stopped taking steroids because they are not effective



- Is the company's approach to estimating corticosteroid complication costs suitable for decision making?

[Link to slide 39](#)

[Link to slide 41](#)

Key issue: Treatment effect after efgartigimod



Committee comments at ACM1

- A residual treatment effect after treatment stops was plausible but uncertain

Company response to draft guidance – base case unchanged

- Asked 1 clinical expert to review available data (additional analysis of ADAPT and ADAPT+ data, real world evidence from U.S.A and other efgartigimod indications)
 - ↳ Clinical expert believes assuming a 15% “limited residual effect” is plausible

EAG comments

- Residual effects of efgartigimod after it is discontinued is plausible but uncertain
- Evidence from ADAPT/ADAPT+ may not be generalisable to the proposed population

Clinical expert (web comment)

- Unaware of a residual treatment effect; people report earlier relapsing and so shortening of intervals between treatment doses

NICE tech team comments

- ≈50% of incremental QALY gains come from this assumption



- Is the company’s residual treatment effect assumption suitable for decision making?

Key issue: Placebo effect



Background

- To model the ECM arm transitions, observations in placebo arm of ADAPT were used up to 16 weeks → Cohort then return towards baseline health-state distribution and remain in the same health state unless a crisis or death occurs
- NICE asked the company to explain why

Company comments

- Model also considers a worsening of disease in efgartigimod arm during the off-treatment period and in cohort who permanently discontinue treatment
- Average duration from disease diagnosis in ADAPT AChR+ patients was 9.3 years
- Possible regression to the mean, a trial effect, or a placebo effect played a role → However, all are specific to a trial setting and are not likely to remain permanently

EAG comments

- Consider company's placebo arm modelling assumptions to be reasonable

NICE tech team comments

- Assuming ECM returns to baseline = higher IVIg use and lower utilities in this arm

- Is the company's approach to modelling the ECM arm suitable for decision making?

Uncaptured benefits

Company comments

- [REDACTED]
 - Subcutaneous formulation enables faster administration and potential for self-administration, reducing burden on patients, caregivers, and healthcare providers
 - Administered as a single dose with no adjustment based on weight or other factors
- ↳ Provided scenario (SC:80%, IV:20%) → [Link to slide 30](#)

Patient group comments

- Efgartigimod is quicker than conventional therapy to take effect
- There is significant unmet need current treatments are slow to take effect and associated with significant side effects

Clinical expert (web comment)

- Efgartigimod is the first new immunomodulatory treatment and there are few / no other options for some people with refractory MG

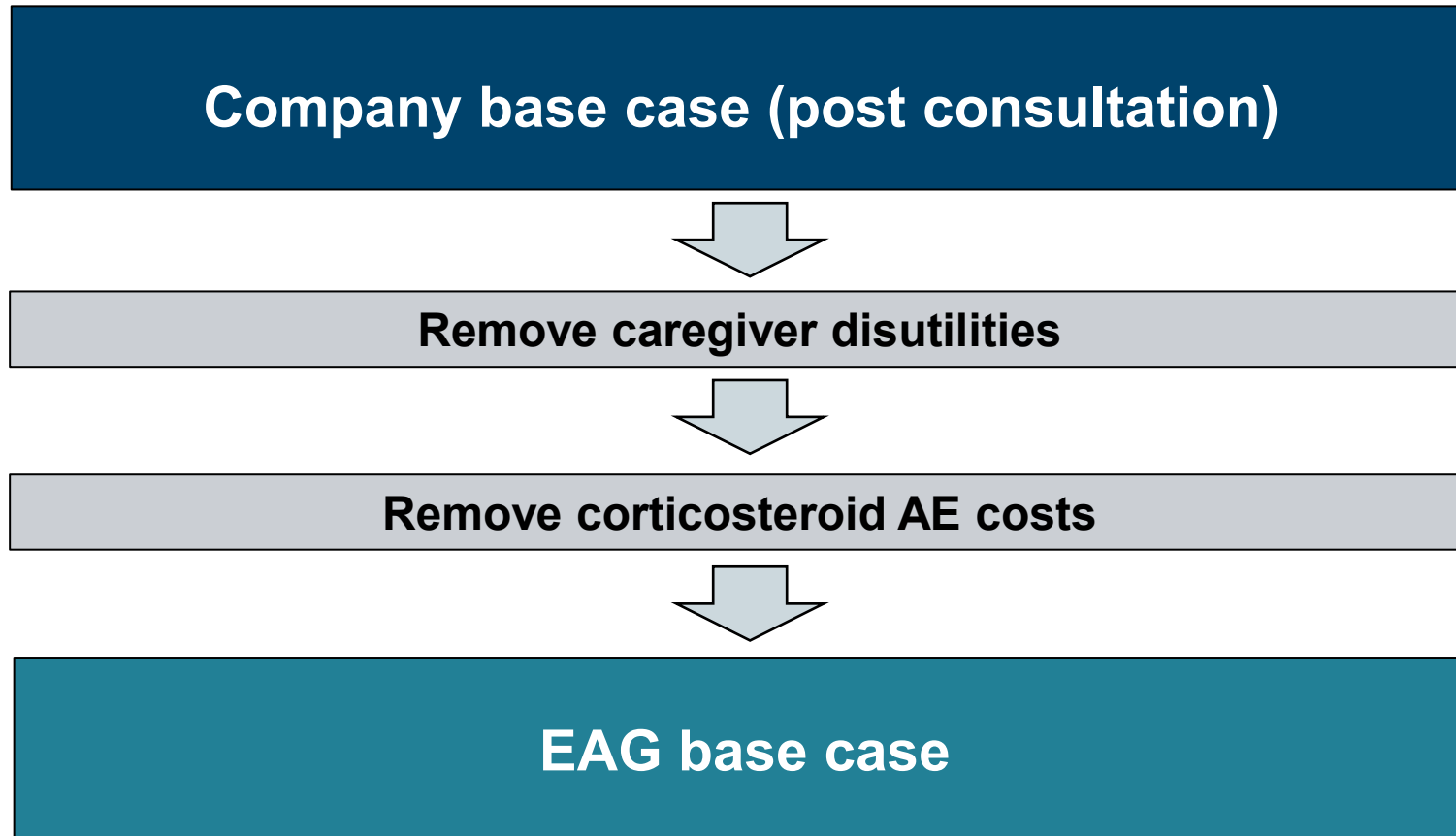


- Are all relevant benefits of efgartigimod captured in the model?

Cost-effectiveness results

All ICERs are reported in PART 2 slides
because they include confidential
PAS discounts

Cost-effectiveness results and scenarios



Thank you.

Supplementary slides

Efgartigimod subcutaneous formulation

Table Regulatory details

| | |
|----------------------------------|---------------------|
| EMA CHMP positive opinion | 14th September 2023 |
| Anticipated MHRA approval | November 2023 |

Table Technology details

| | |
|-----------------------|---|
| Administration | <ul style="list-style-type: none"> • 1000 mg per week for 4 weeks per cycle • Subsequent treatment cycles are administered according to clinical evaluation → The frequency of treatment cycles may vary by patient |
| Price | <ul style="list-style-type: none"> • List price: £15,307.47 per 1000 mg dose |

The company suggest that the SC formulation will offer additional benefits such as a faster administration and the potential for self-administration, therefore reducing burden on patients, caregivers, and healthcare providers

The company provided a scenario that assumes 80% of people receive SC efgartigimod and 20% receive IV efgartigimod → The same model and effectiveness inputs are used only the acquisition and administration costs differ

Trial results ADAPT

ADAPT Primary outcome - MG-ADL responders in cycle 1

MG-ADL is a patient-reported scale developed to assess MG symptoms and their effects on daily activities

- It has an eight-item scale where each item is given a value from 0 (normal) to 3 (severe) → total score can range from 0 to 24 (higher = more severe)

MG-ADL is used to define model health states that capture disease activity levels

Primary outcome: Proportion who were MG-ADL responders in the first treatment cycle

- ≥2-point improvement (reduction) in total MG-ADL score → sustained for ≥4 consecutive weeks → first improvement occurring by week 4 of the cycle

Table 6: Proportion of MG-ADL responders, AChR Ab+ population

| | Efgartigimod (n=65) | Placebo (n=64) |
|-------------------------|-------------------------------------|-----------------------|
| Responders % (n) | 68% (44) | 30% (19) |
| OR / p value | 4.95 (95% CI 2.21, 11.53); p<0.0001 | |

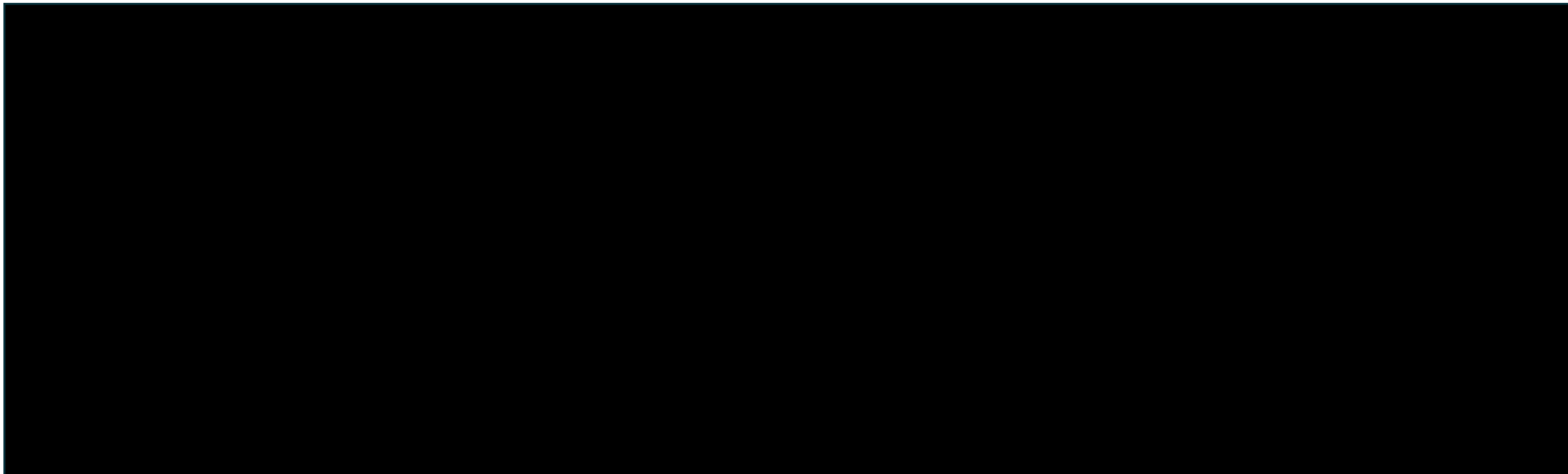
Trial results ADAPT+

ADAPT+ efficacy outcome: MG-ADL total score

Mean MG-ADL change from baseline was measured at week 3 of each cycle





- CMIs (≥ 2 -point improvement (reduction) in MG-ADL score) were made in each of cycles 1 to 14 \rightarrow For all cycles, [REDACTED] of people with AChR-Ab+ had an improvement of ≥ 2 points while [REDACTED] had an improvement of ≥ 3 points

Figure Mean change from cycle baseline MG-ADL total score (AChR Ab+)






CMI
(≥ 2 -point
improvement
in MG-ADL
score)

Committee discussion at ACM2 (1)

| Parameter | Key question | Scenarios | ICER impact |
|------------------------|---|---|---|
| Population | What population should be included in any potential recommendation? | <ul style="list-style-type: none"> The company's new proposed target population | Large  |
| Maintenance IVIg | <ul style="list-style-type: none"> Should IVIg be included as a maintenance therapy? If so, what overall % and what % in each health state should be assumed? | <ul style="list-style-type: none"> Not included | Large  |
| | | <ul style="list-style-type: none"> EAMS/EAMS+ estimates | |
| | | <ul style="list-style-type: none"> Company's updated estimate <ul style="list-style-type: none"> ↳ Total maintenance IVIg treatment use of █████/█████ | |
| Utility values | Which source should be used for decision making? | <ul style="list-style-type: none"> Pooled ADAPT | Large  |
| | | <ul style="list-style-type: none"> MyRealWorldMG | |
| Caregiver disutilities | Are the company's caregiver utility decrements appropriate? | <ul style="list-style-type: none"> Not included | Large  |
| | | <ul style="list-style-type: none"> The company's caregiver utility decrements | |

Committee discussion at ACM2 (2)

| Parameter | Key question | Scenarios | ICER impact |
|------------------------------|--|---|---|
| Corticosteroid complications | Are corticosteroid complication costs estimated using information from Lee et al. 2018 suitable? | <ul style="list-style-type: none"> • Not included • Costs estimated using Lee et al. 2018 ↳ Costs applied only for patients who found their side effects intolerable (weighted average of 2021-22 costs) | Large  |
| Residual treatment effect | Is the company's efgartigimod residual effect assumption suitable? | <ul style="list-style-type: none"> • The company's assumption (<i>15% of people remain in the MG-ADL < 5 health state after stopping treatment</i>) | Large  |
| Placebo effect | Is the company's approach to modelling the ECM arm suitable? | <ul style="list-style-type: none"> • The company's approach (<i>After 16 weeks ECM cohort assumed to return towards baseline health-state distribution</i>) | Large  |

Key issue: Target population (Supplementary slide 1)



Company response to draft guidance

- No changes made to cost effectiveness model
- **Delphi panel results:** Proportion of people estimated to match target population:
 - ↳ Mean: 22.1% Median: 20% Range: 10% to 40%
- The word ineligible does not refer to all standard gMG treatments
- Efgartigimod must be used as an add-on to standard therapy, not as a monotherapy
 - ↳ In certain situations, clinicians may deem people to be ineligible / not suitable for one of the standard gMG treatments

EAG comments

- Subgroup analysis from ADAPT that the company used to justify making no changes to the model is associated with low certainty, small samples sizes and wide 95% CIs

Proposed alternative population wording

- ↳ “As an add-on to standard therapy for adult patients (≥ 18 years) with gMG who are positive for AChR antibodies AND who have active, refractory disease, with a MG-ADL score ≥ 5 ($>50\%$ of MG-ADL score due to non-ocular symptoms), who have failed, not tolerated or are ineligible for at least one of the standard gMG therapies”

Key issue: Target population (Supplementary slide 2)



Table: Comparison of baseline age and sex characteristics

| | ADAPT (AChR+) | | UK MRWVG cohort* | EAMS/EAMS+ cohort |
|-----------------|---------------|---------|------------------|-------------------|
| | Efgartigimod | Placebo | | |
| Mean age, years | 44.7 | 49.2 | 45.2 | 50.7 |
| Male | 29% | 38% | 20% | 29.1% |
| Female | 71% | 63% | 80% | 70.9% |

*Company and EAG current base cases

ABN – Neuromuscular Advisory Group

- Potential points of use (from an expert clinician’s perspective):
 - Resistant to 1st/2nd line treatment BUT responsive to regular IVIg/PLEX (a very small proportion)
 - A lower risk alternative to IVIg/ PLEX/ Rituximab in MG crisis
 - Resistant cases during MG crisis (acknowledge no trial level evidence to support this (non-responsive to PLEX/IVIg/rituximab))

Clinical expert (web comment)

- Efgartigimod could be used as a bridging treatment (until other treatments start to work)

Key issue: Maintenance IVIg (Supplementary slide)



Company response to draft guidance

- **Delphi panel results:** Proportion of target population eligible/suitable for regular/maintenance IVIg:
 - ↳ Mean: 69.2% Median: 70% Range: 60% to 90%

EAG comments

- Based on Delphi panel results
 - ↳ For every 100 people with gMG, 22 (range 10-40) would match target population and be eligible for efgartigimod. Of these, 15 (range 6-36) expected to be prescribed regular/maintenance IVIg

Clinical expert (web comment)

- People on regular long term IVIg could be transferred to efgartigimod

Key issue: Caregiver disutility (Supplementary slide)



Company response to draft guidance

- Utility decrements obtained by comparing caregiver utility values to age and gender matched UK general population
- This alternative analysis supports previously submitted evidence



Key issue: Corticosteroid complication costs (Supplementary slide 1)

Committee comments at ACM1

- Costs should be generalisable to NHS clinical practice, applicable to gMG and valued using relevant NHS prices

Company response to draft guidance

- TLR developed to capture papers reporting frequency of AEs associated with corticosteroid use
- A weighted average of male and female frequencies of AEs from Lee et al. 2018 was multiplied by unit costs obtained from the national schedule of NHS costs
- Cost applied in model for both high and low dose corticosteroid use
- Could be conservative: calculation assumes events present only once a year

ABN – Neuromuscular Advisory Group

- Costs from asthma or MS populations are not comparable to a MG cohort
 - ↳ A better comparator would be another autoimmune neuromuscular condition where similar doses are used for a similar amount of time

Key issue: Corticosteroid complication costs (Supplementary slide 2)



EAG comments

- Several concerns;
 - ↳ Lee et al. does not report AEs for people not receiving corticosteroids → Not possible to separate AEs due to corticosteroids from those due to MG
 - ↳ Many AEs reported in Lee et al. may not be severe → NICE appraisals often only cost AEs relating to severe AEs (grade 3+)
 - ↳ Company assume all AEs are treated in a hospital episode
 - ↳ Unit costs calculated using an average of multiple HRG codes → A weighted average should have been used to reflect activity in different codes
 - ↳ Unnecessary to inflate to 2023 costs - cost year in model was 2022
 - ↳ Some NHS codes for AEs are inappropriate and likely overestimate costs
 - ↳ Question using the same AE costs for both high and low dose corticosteroid use



Key issue: Corticosteroid complication costs (Supplementary slide 3)

Table: Costs for corticosteroid-related chronic complications

| | High dose threshold | Cost per week | | Annual cost | |
|-------------------------------|---------------------|---------------|----------|-------------|------------|
| | | High dose | Low dose | High dose | Low dose |
| Company base case ACM2 | - | £251.67 | £251.67 | £13,131.60 | £13,131.60 |
| Company base case ACM1 | 7.5mg/day | £233.74 | £110.13 | £12,154.33 | £5,726.60 |
| EAG base case ACM1 | 7.5mg/day | £43.99 | £6.16 | £2,287.48 | £320.32 |

Key issue: Placebo effect (Supplementary slide)



Company response to draft guidance

- Average duration from disease diagnosis in ADAPT AChR+ patients was 9.3 years
 - ↳ Suggests ECM would likely remain inadequate to improve disease activity
 - ↳ Baseline distribution is representative of the expected distribution
- No long-term data on the ECM arm alone is available

EAG comments

- Consider it reasonable that effect observed in the placebo arm may not be long lasting, therefore the placebo arm returning to baseline does not seem unreasonable
- Do not consider it necessary to adjust treatment effect in the placebo arm as it is possible that the additional treatment effect was also present in the efgartigimod arm