

Roxadustat for treating anaemia in people with chronic kidney disease [ID1483]

Lead team presentation

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ERG: Kleijnen Systematic Reviews

Chair: Amanda Adler

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Company: Astellas Pharma

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Clinical effectiveness

Issues - clinical effectiveness

Topic	Question
Roxadustat in pathway	Appropriate?
Population	Appropriate? Iron replete in UK?
Comparator	Appropriate? Class effect? Are there people who cannot take ESAs?
DOLOMITES trial	Generalisable to the UK?
DOLOMITES trial results	Is roxadustat not worse than darbepoetin alfa?
Best use of evidence	All trials – if so, how combined? DOLOMITE trial only?
Adverse events	Which to include in model?

Anaemia in chronic kidney disease (CKD)

- Haemoglobin (Hb) carries oxygen in blood; anaemia defined by low Hb
- In people with chronic kidney disease (CKD) anaemia is common because unhealthy kidneys make less erythropoietin which helps make red blood cells
- NICE guidelines for anaemia with CKD (NG203) advises aiming for Hb 0–12 g/dL
 - Standard treatment includes iron then, if necessary, erythropoietin stimulating agents
 - MHRA warns when treating anaemia with ESAs to Hb >12g/dL → risk of death + cardiovascular disease
- 5 stages of CKD based on estimated glomerular filtration rate (eGFR) – anaemia increases with worsening renal function
- Anaemia independent predictor for CKD progression and all-cause mortality

Stage	Description	Anaemia prevalence
1	Normal GFR	6%
2	Mildly decreased GFR	3%
3a	Mildly to moderately decreased GFR	5%
3b	Moderately to severely decreased GFR	17%
4	Severely decreased GFR	34%
5	Kidney failure	43%

Patient and carer perspectives - anaemia

Comments from: Kidney Care UK, patient experts

Living with anaemia associated with CKD



- Affects everyday life with extreme fatigue and lack energy even for simple tasks
- Negatively affects mental health and impacts on the quality of life of people already living with the challenges of CKD
 - *“Living with CKD for over a decade has been very challenging, but with the added burden of anaemia associated CKD, [it] impacted severely on the quality of my life. I only realised the severity of this during dialysis ... I was always exhausted. I felt extreme fatigue but could not express how I felt to my family because I ‘looked fine’. For a few months I couldn’t drive, work and some days, not even hold a glass of water or raise my arm. It impacted my mental health ...”*
 - *“..my husband recalls driving me to and from dialysis sessions, staying with me through my treatment, just in case I may not be able to walk back to the car. ...”*
- Anaemia can also affect physical health

Patient and carer perspectives - treatments

Experience of current treatments



- Many adults find injecting themselves with ESA unpleasant and difficult. Some unable to administer injections themselves and rely on others.
 - *“I struggled to inject myself. The needle was quite long ...”*
 - *“In 2014 I became very ill with CKD and required oral iron and ESA ... My teenage daughter was horrified one day ... she seemed to understand taking oral medication but [thought it] barbaric to have an injection and give it to myself.”*
- Side effects of current treatments can be unpleasant and impact on quality of life
 - *“I have had numerous oral iron (sic) which has always caused abdominal discomfort.”*
- Adults with anaemia believe an oral medication would be better:
 - More convenient to administer
 - Avoids training to self-inject and disposing of sharps
 - Requires no refrigeration
 - It would be easier to store when given the requirement for storage and sharps disposal
 - Reduces the need for iron infusions would be advantageous:
 - And transfusions to avoid the risk of producing antibodies that might limit transplant

Roxadustat (Evrenzo, Astellas Pharma)

Marketing authorisation	Adults with 'symptomatic anaemia associated with chronic kidney disease'
Administration and dose	<p>Oral</p> <p>Recommended starting dose: based on ESA history and patient weight</p> <ul style="list-style-type: none">• For anaemia not treated with ESA:<ul style="list-style-type: none">• 70 mg 3 times per week if patient weighs <100 kg• 100 mg 3 times per week if patient weighs ≥100 kg <p>Maintenance dose</p> <ul style="list-style-type: none">• 20 to 400 mg for dialysis-dependent CKD• 20 to 300 mg for non-dialysis-dependent CKD
Other	<p>A 'physician experienced in the management of anaemia' should start treatment</p> <p>Converting 'dialysis patients otherwise stable on ESA treatment... only... when there is a valid clinical reason'</p>
Mechanism	Hypoxia-inducible factor (HIF) prolyl hydroxylase inhibitor
Price	<p>List prices for 5 different strengths of roxadustat – confidential; prices increase with dosage</p> <ul style="list-style-type: none">• Cost per year: £2,696 (70mg dose, 3 times per week for weight <100kg) <p>Company has agreed a confidential patient access scheme - simple discount - with NHS England</p>

Treatment pathway + positioning of roxadustat

After iron therapy, as **alternative** to ESA, for anaemia associated with non-dialysis-dependent CKD stage 3–5 at treatment initiation



Adults with anaemia associated with CKD

Symptomatic anaemia, not on dialysis when starting treatment, CKD stage 3–5

Iron replete

NO

Oral or IV iron therapy



YES

Benefits to avoiding transfusion

YES

Erythropoietin stimulating agents (ESA)



Roxadustat?



NO

ESA therapy ineffective or risky

YES

Red blood cell transfusion



*NICE guidelines recommend avoiding blood transfusions, in people with option for kidney transplant.

Company's positioning of roxadustat

Less likely to be used to treat in CKD 1, 2 or 5 when on dialysis

Company

Target population adults with

- **symptomatic anaemia**
- **CKD 3 to 5**
- **not dialysing**

Company chose this based on:

- **Population in clinical trials**
- **Clinical experts:** giving ESA + IV iron not a burden for adults on dialysis
- **Roxadustat license precautions:** Switch patients from ESA to roxadustat only “when there is a valid clinical reason.”

Clinical experts

- Anaemia in CKD 1 or 2 can respond to iron alone
- Difficult to justify roxadustat in dialysis – current therapy IV through dialysis machine
- But patients on peritoneal dialysis may prefer roxadustat
- Some patients cannot take ESAs: chronic inflammation, no response to ESA, averse or struggling with needles.

- ⊙ *Is the company's positioning of roxadustat in treatment pathway appropriate?*
- ⊙ *Is the population appropriate? Would UK population be expected to be iron replete?*
- ⊙ *Is the comparator appropriate? – Class effect?*
- ⊙ *Are there people who cannot take ESAs?*

Scope and decision problem

PICO: Population-intervention-comparison-outcome

Population in company submission narrower than scope

	NICE scope	Company submission	Justification	ERG
P	Adults with anaemia associated with CKD	Adults symptomatic anaemia CKD 3–5 not dialysing at start of treatment	<ul style="list-style-type: none"> • ESA during dialysis easier on patients • Limited data CKD stage 1 or 2 	<ul style="list-style-type: none"> • Adults with CKD stage 1 or 2 can have anaemia • NICE comment - regulatory concerns of switching dialysis patients
I	Roxadustat		-	-
C	Erythropoiesis stimulating agents		-	<ul style="list-style-type: none"> • Most trials placebo
O	<ul style="list-style-type: none"> • Hb response • Hb maintenance • Iron therapy, transfusions • Hospitalisation • Mortality • Adverse events • Health-related quality of life 	<ul style="list-style-type: none"> • All but hospitalisation 	<ul style="list-style-type: none"> • Cost of hospitalisation captured through adverse events, administering drug, monitoring 	<ul style="list-style-type: none"> • Using indirect measures problematic • Not in line with the NICE guidance that indirect (surrogate) outcomes should be used only when direct outcomes are not possible.

Roxadustat randomised trials evidence base

Only 1 trial (DOLOMITES) compared roxadustat with active ESA comparator

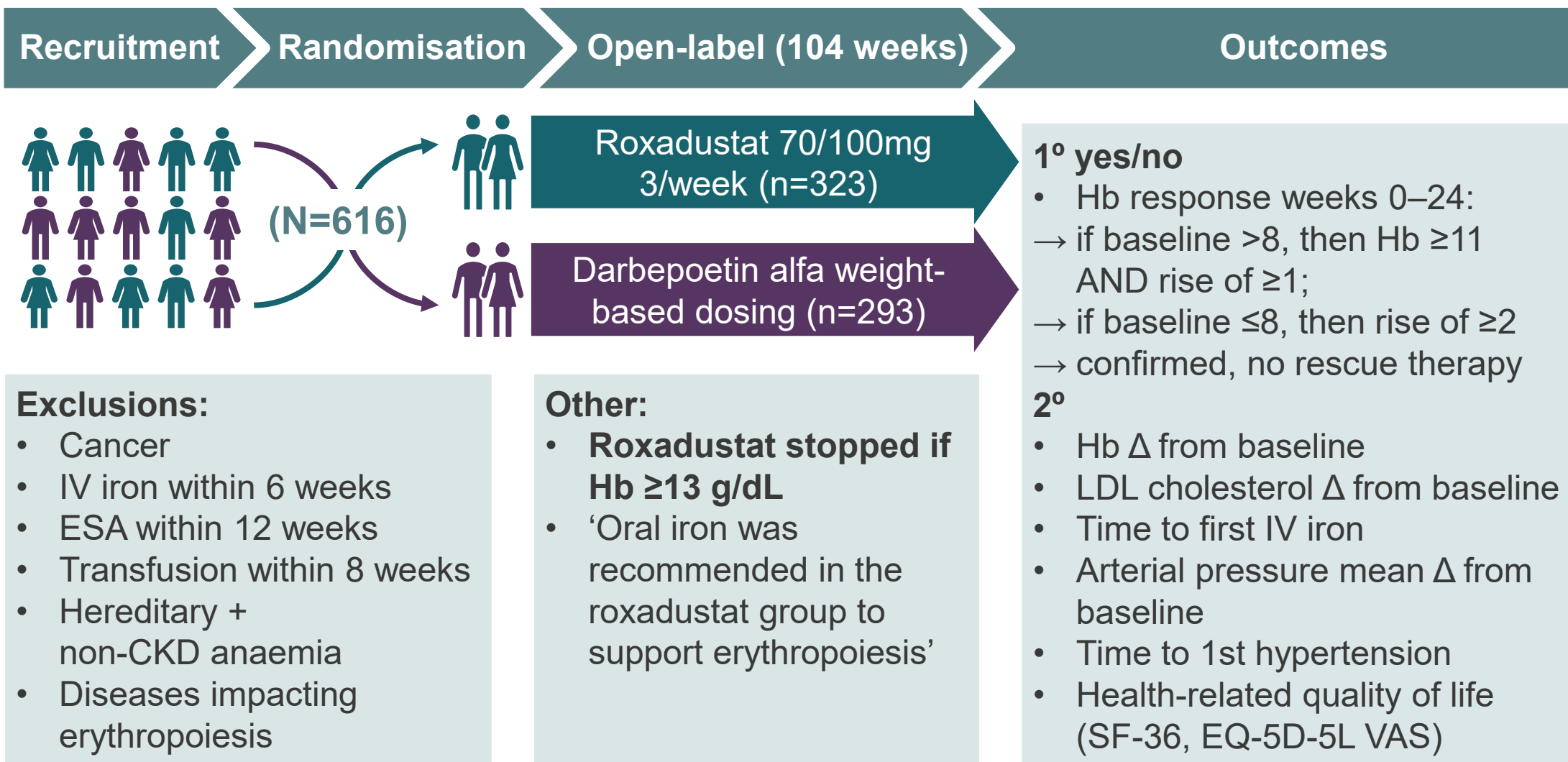
	ALPS (n=594)		ANDES (n=922)		OLYMPUS (n=2,761)		DOLOMITES (n=616)	
Trial design	Double-blind	✓	Double-blind	✓	Double-blind	✓	Open-label	✗
Population	Adults (≥18)	✓	Adults (≥18)	✓	Adults (≥18)	✓	Adults (≥18)	✓
	Symptomatic anaemia	✗	Symptomatic anaemia	✗	Symptomatic anaemia	✗	Symptomatic anaemia	✓
	Hb <10.0 g/dL	✓	Hb <10.0 g/dL	✓	Hb <10.0 g/dL	✓	Hb <10.5 g/dL	✓
	eGFR <60	✓	eGFR <60	✓	eGFR <60	✓	eGFR <60	✓
Intervention	Roxadustat	✓	Roxadustat	✓	Roxadustat	✓	Roxadustat	✓
Comparator	Placebo	✗	Placebo	✗	Placebo	✗	Darbepoetin alfa	✓
1 ^o Outcome	Hb response	✓	Hb response	✓	Hb response	✓	Hb response	✓
In model?	Yes	✓	Yes	✓	Yes	✓	Yes	✓

NICE Age in years. eGFR: estimated glomerular filtration rate in ml/min/1.73 m²;
Hb: haemoglobin in g/dL.

DOLOMITES trial design – non-inferiority

Phase 3, randomised, open-label trial, 28 countries including UK

Excluded patients who could not take ESAs



CKD, chronic kidney disease, EQ-5D-5L: EuroQol 5 Dimensions 5 Levels, ESA: erythropoiesis-stimulating agent, IV: intravenous, Hb: haemoglobin, LDL: low density lipoprotein, RBC: red blood cell, SF-36: Short form 36, VAS:¹² visual analogue scale. haemoglobin in g/dL

DOLOMITES trial – statistical methods

Non-inferiority trial design

	Description	Comments
Power	>98%, if >80% of patients in each group responded	
Non-inferiority statistical analyses - 1° outcome		
Non-inferiority criteria	If lower limit of 2-sided 95% CI > 15% difference in proportions of responders between groups	No plan for superiority
Choosing margins	High responder rate based on urinary tract infections. 3 placebo-controlled studies show that small differences between roxadustat and an ESA 'would not be relevant.'*	
Analysis population*	All randomized patients who received ≥ 1 doses of drug + ≥ 1 post-dose Hb (per protocol set)	Not intention to treat
Covariates	<ul style="list-style-type: none"> • Geographical region • Baseline Hb • CV or cerebrovascular or thromboembolic disease • Baseline eGFR 	For 1° and 2° outcomes
Analysis	Miettinen and Nurminen approach	
Non-inferiority statistical analyses* - 2° outcomes defined in clinical study report		
Analysis	Hierarchical testing: 1 st non-inferiority then if non-inferior, superiority for some 2° endpoints Mixed model of repeated measures or Cox regression + Kaplan-Meier	Some 2° tested for superiority

* Supplementary material on selecting non-inferiority margin. *Nephrol Dial Transplant* (2021) 36: 1616–1628

Roxadustat trials – demographics

Proportion female 51–59%, mean age range 61–67 years

Race and region distribution vary substantially across trials

Trial Allocation	ALPS		ANDES		OLYMPUS		DOLOMITES	
	ROX	PBO	ROX	PBO	ROX	PBO	ROX	ESA
Number	391	203	616	306	1,384	1,377	323	293
Sex								
Female	57%	51%	61%	58%	59%	56%	55%	56%
Age (years)								
Mean	60.6	61.7	64.9	64.8	60.9	62.4	66.8	65.7
Race								
White	86%	90%	29%	33%	45%	44%	95%	96%
Black / African American	3%	1%	12%	9%	8%	9%	2%	1%
Asian	2%	0	50%	49%	39%	39%	3%	3%
Other	9%	9%	9%	9%	8%	8%	0	0
Region								
Western Europe & Israel	-	-	-	-	-	-	31%	29%
Central & Eastern Europe	-	-	-	-	-	-	69%	71%
US	-	-	-	-	25%	25%	-	-
Ex-US	-	-	-	-	75%	75%	-	-
Western Europe	7%	8%	-	-	-	-	-	-
Rest of World	93%	92%	-	-	-	-	-	-

Roxadustat trials – baseline disease characteristics

Mean Hb levels 9.1–9.5 g/dL, comorbidities and iron repletion status vary

Parameter	ALPS		ANDES		OLYMPUS		DOLOMITES	
	ROX	PBO	ROX	PBO	ROX	PBO	ROX	ESA
	391	203	616	306	1,384	1,377	323	293
Hb, g/dL mean	9.1	9.1	9.1	9.1	9.1	9.1	9.6	9.6
≤8	8%	10%	8%	7%	9%	10%	3%	3%
>8 to ≤9	92%	90%	28%	32%	91%	90%	97%	97%
>9			64%	61%				
Comorbidities								
Type 2 diabetes, %	34%	37%	-	-	57%	59%	44%	42%
CVD history, %	36%	44%	34%	33%	30%	31%	47%	48%
Iron repletion (ferritin [F] ng/mL, transferrin saturation [TSAT] %)								
F <100 & TSAT <20%	-	-	-	-	-	-	16%	22%
F <100 & TSAT ≥20%	-	-	-	-	-	-	8%	8%
F ≥100 & TSAT <20%	-	-	-	-	-	-	20%	18%
F ≥100 & TSAT ≥20%	-	-	-	-	-	-	56%	52%
F <30 or TSAT <5%	4%	3%	-	-	-	-	-	-
F 30–100 & TSAT 5–20%	14%	14%	-	-	-	-	-	-
F 30–100 & TSAT >20%	12%	12%	-	-	-	-	-	-
F >100 & TSAT 5–20%	18%	18%	-	-	-	-	-	-
F >100 & TSAT >20%	52%	54%	60%	56%	59%	58%	-	-

NICE CVD: cardiovascular disease, PBO: placebo.

DOLOMITES trial design and population

Not in line with UK practice and guidance; 10% from UK

- **ERG:** UK and non-UK differ in concomitant medications + other factors
- **Company:** chose not to conduct subgroup analysis of UK population
- **Clinical experts:**
 - DOLOMITES does not reflect Asian/Black/Other
 - UK 13% CKD 4 + 5 (UK Renal Registry 2019) vs DOLOMITES 5%
- DOLOMITES – inclusion criteria not generalisable to UK
 - Prohibiting recent iron inconsistent with UK practice and NICE guidance
 - In UK IV iron offered to patients receiving ESA therapy:
 - ██████████ of UK patients receiving an ESA received IV iron and ██████████ received oral iron (TUNE study; retrospective study of UK population)
 - Different treatment threshold. Hb <11 g/dL should trigger investigation and possible treatment of anaemia:
 - DOLOMITES included lower Hb threshold lower ≤ 10.5 g/dL

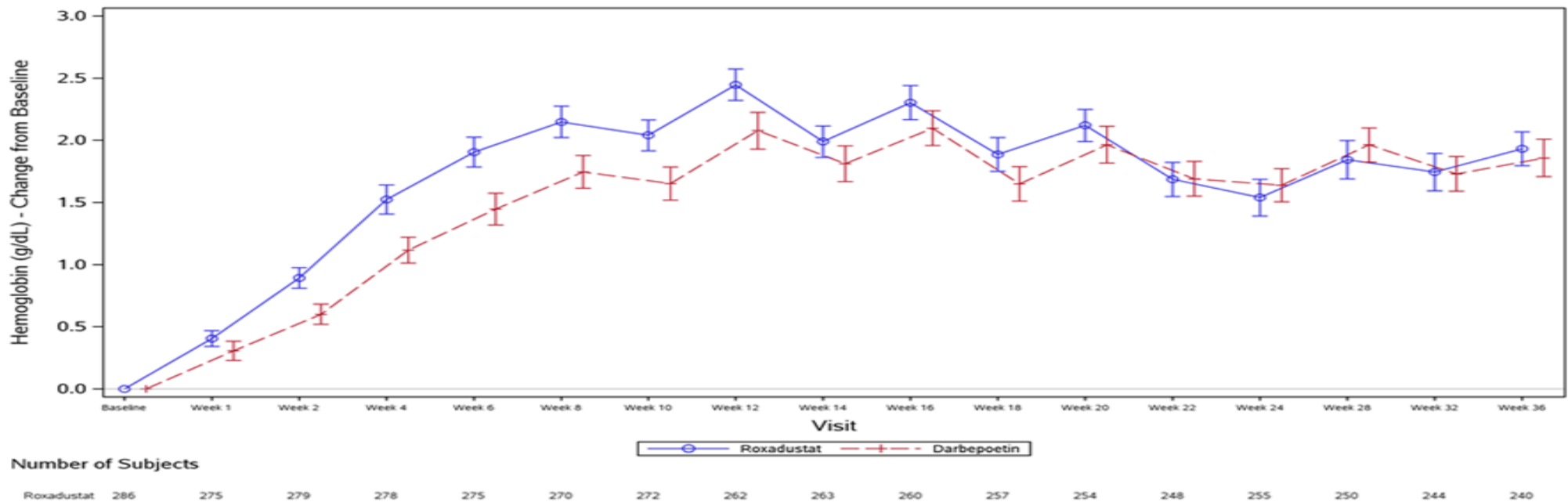
⊙ *Is the DOLOMITES trial population generalisable to NHS patients who would be offered roxadustat? If not, how is this likely to affect modelling results?*

DOLOMITES trial results - 1^o outcome

*Roxadustat non-inferior compared to darbepoetin alfa in 1^o outcome:
Hb response and change from baseline in Hb levels*

1 ^o outcome	Roxadustat (N=286)	Darbepoetin alfa (N=273)	Difference in proportion	Conclusion
Hb response* (weeks 0–24), n (%)	256 (89.5%)	213 (78.0%)	11.5%	Roxadustat non-inferior to darbepoetin alfa

Mean (\pm 95% CI) change from baseline in Hb level to week 36



- ⊙ Does the committee agree that roxadustat is not worse than darbepoetin alfa?
- ⊙ Has the committee seen evidence for people who cannot take ESA?

DOLOMITES trial results - 2^o outcomes

Roxadustat non-inferior compared to darbepoetin alfa

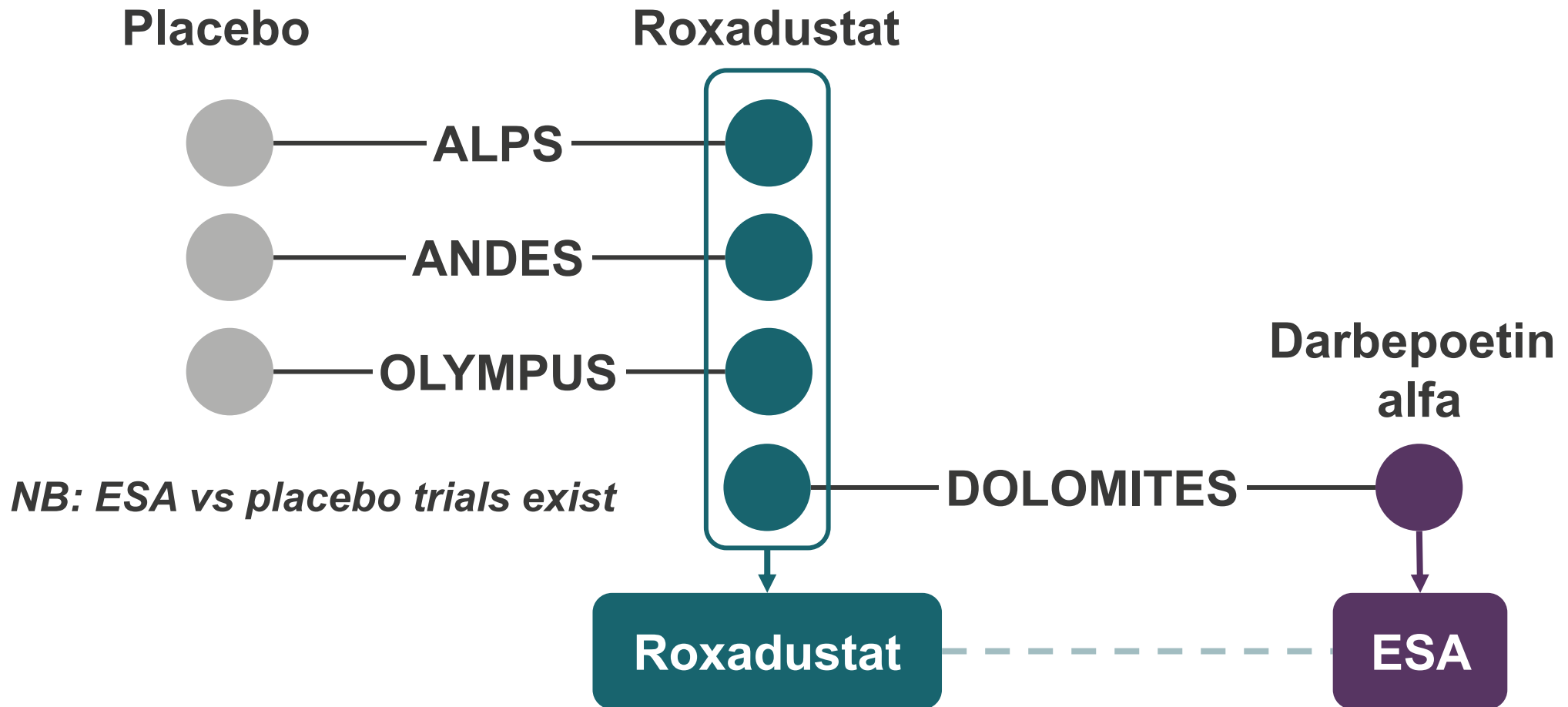
Secondary outcomes	Roxadustat vs. darbepoetin alfa	Test results
Change from baseline, LSM difference (95% CI)		
Hb (g/dL), weeks 28–36	0.01 (-0.13, 0.16)	Non-inferior
SF-36 PF subscore, weeks 12–28	-1.28 (-2.42, -0.14)	Non-inferior
SF-36 VT subscore, weeks 12–28	-0.42 (-1.62, 0.78)	Non-inferior
FACT-An Anaemia Subscale, weeks 12–28		
FACT-An Total Score, weeks 12–28		
EQ-5D-5L VAS, weeks 12–28		
Mean arterial pressure (mmHg), weeks 20–28	-0.36 (-1.57, 0.85)	Non-inferior
LDL cholesterol (mmol/L), weeks 12–28	-0.40 (-0.51, -0.29)	Superior
Time to first occurrence, HR (95% CI)		
Hypertension, weeks 1–36	0.82 (0.56, 1.22)	Non-inferior
IV iron, weeks 1–36	0.46 (0.27, 0.80)	Superior

NICE

EQ-5D-5L: EuroQoL 5 Dimensions 5 Level; FACT-An: Functional Assessment of Cancer Therapy – Anemia, LDL: IV: intravenous, low-density lipoprotein, SF-36: Short-Form 36, VAS: visual analogue scale.

Pooling roxadustat trials

Company pooled all trials and conducted analyses of individual patient data to estimate clinical parameters for roxadustat



Pooling trials – company approach

Pooled population differs from DOLOMITES in CVD and type 2 diabetes

- Identified differences in baseline patient characteristics prognostic for Hb response
- If not effect modifiers, then ‘unjustified to exclude 3 of 4 relevant trials’
- Controlled for trial ID and confounders using hierarchical model structure, which ‘cannot be done using fixed/random effect meta-analyses’
- Similar roxadustat dose, dosing schedule and delivery across all trials
- However, large differences in CVD and diabetes

Baseline characteristic	Pooled	DOLOMITES		
		Roxadustat	Darbepoetin alfa	Total
Number	4,847	323	293	616
Starting age (years)	63	67	66	66
Female, %	58%	55%	56%	55%
Cardiovascular disease, %	38%	47%	48%	48%
Type 2 diabetes, %	56%	44%	42%	43%
Median eGFR ml/min/BSA	17.1	17.5	18.5	-
% from DOLOMITES	13%	-	-	100%
% from ALPS	12%	-	-	-
% from ANDES	19%	-	-	-
% from OLYMPUS	56%	-	-	-

Pooling trials – ERG comments

Pooling all trials for roxadustat may bias comparison with ESA

- Pooling is an unanchored indirect treatment comparison and likely to be biased.
- To avoid bias, must balance all prognostic factors and effect modifiers across trials
- Pooling removes randomisation → patients not drawn randomly from same population → effect modifiers + prognostic factors not balanced across treatments
- Effect modifiers and prognostic factors may be **unmeasured** for which company cannot control and could bias outcome
- DOLOMITES trial results are less likely to be biased → used in ERG base case

⊙ *What is the best way use trial data to estimate treatment effect?*

1. Pooled? If so, how?
2. Network using placebo-controlled ESA trials
3. DOLOMITES trial data – only –?

⊙ *How should non-inferiority be modelled?*

DOLOMITES trial adverse events

Some adverse events differed between roxadustat and darbepoetin alfa, but company included only major adverse cardiovascular events and vascular access thrombosis

	Roxadustat (n=323)	Darbepoetin alfa (n=293)
Oedema peripheral	49 (15.2)	36 (12.3)
Hyperkalaemia	38 (11.8)	42 (14.3)
Nausea	35 (10.8)	25 (8.5)
Hyperphosphataemia	28 (8.7)	15 (5.1)
Muscle spasms	25 (7.7)	15 (5.1)
Dyspnoea	24 (7.4)	12 (4.1)
Headache	21 (6.5)	12 (4.1)
Insomnia	19 (5.9)	8 (2.7)

	Pooled trials		DOLOMITES	
	Roxadustat (N=2386)	Placebo (N=1884)	Roxadustat (N=323)	ESA (N=293)
Myocardial infarction	██████████	██████████	██████████	██████████
Stroke	██████████	██████████	██████████	██████████
Vascular access thrombosis	██████████	██████████	██████████	██████████

- ⊙ *What adverse events should company include in model? Note model includes quality of life associated with adverse events*
- ⊙ *Source of adverse events? Pooled trials or DOLOMITES?*

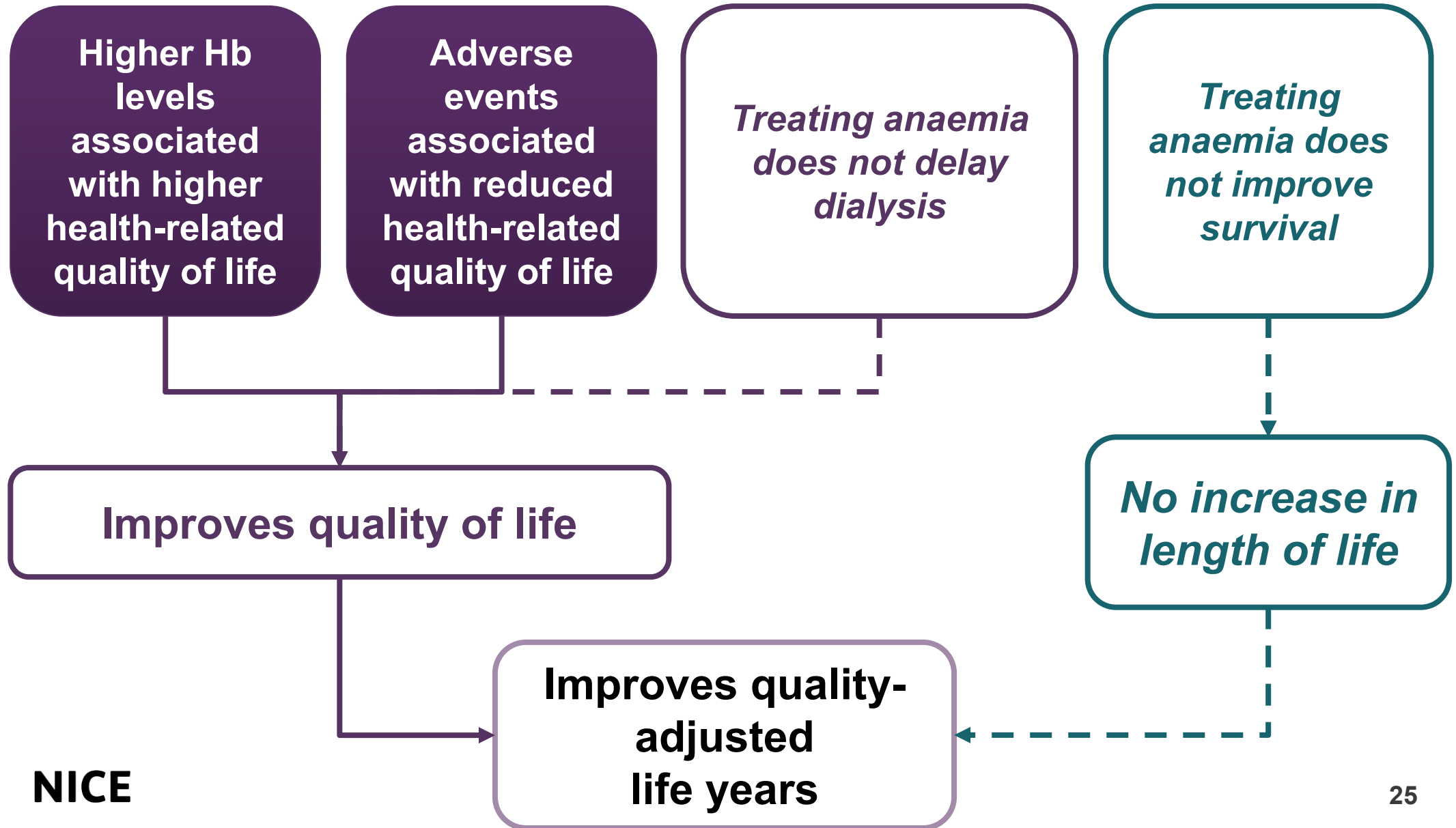
Cost effectiveness

Issues - cost effectiveness

Topic	Question
Model structure	Appropriate?
Non-inferiority	Appropriate to model?
8 Hb categories	Discrete and distinguishable impacts on quality of life?
Utilities by health state	Is an 'additive' approach appropriate?
Hb level utility decrements	Committee view on company's regression and transparency?
Distributing patients across Hb states over time	Committee view on company's regression and transparency?
Extrapolating time to dialysis and to death	Has the company adequately explained and justified its methods?
Hospitalisations	How should they be modelled?
Costs of comparator and administering it	Appropriately modelled?
Other	Innovative? Equality issues?

How model accrues quality-adjusted life years

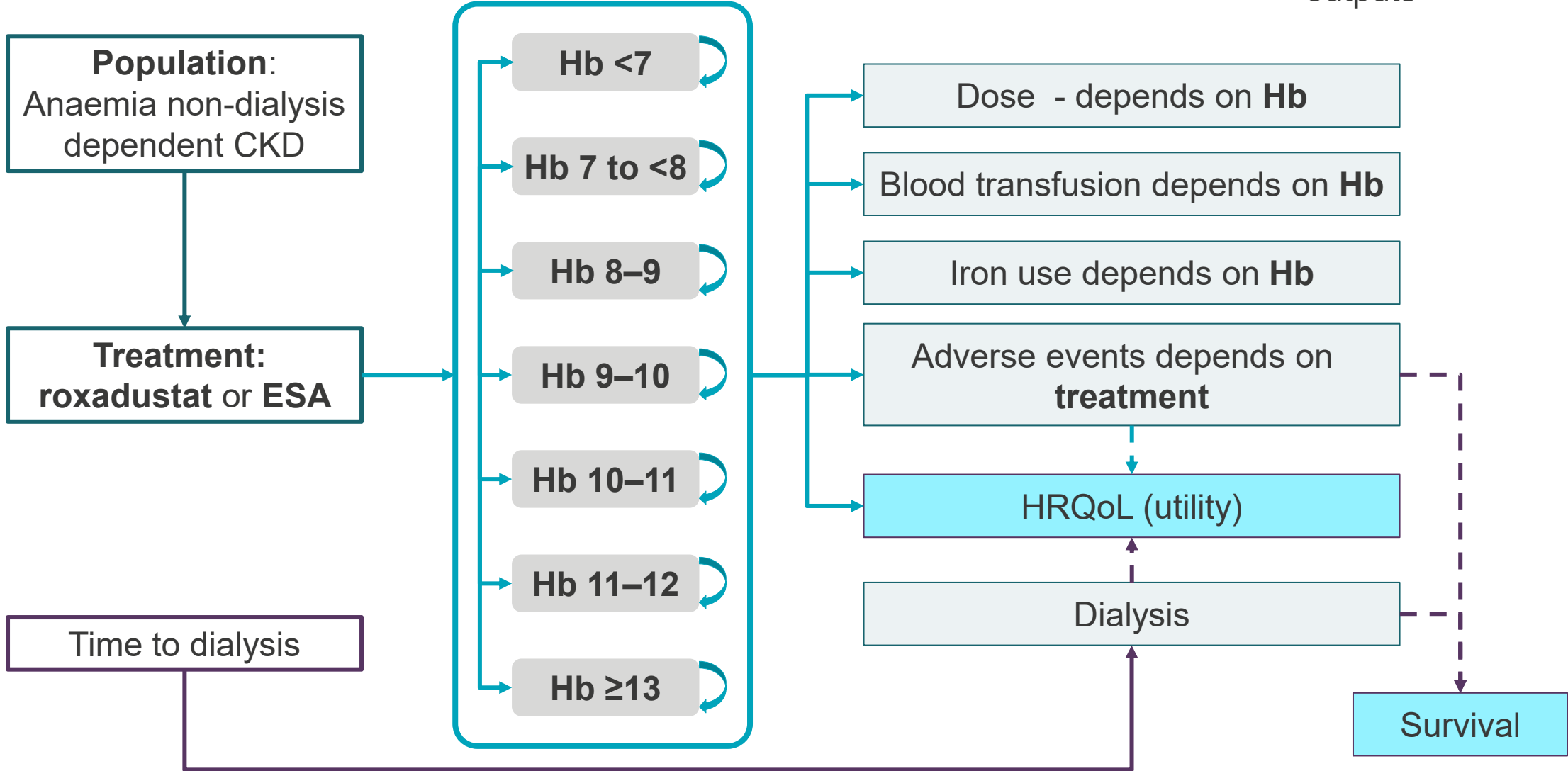
Company assumes roxadustat improves only quality of life



Model structure

Cohort state transition model based on Hb
Treatment effect + transition probabilities from pooled roxadustat trials; 25-year time-horizon

Resource use & costs → Explicit modelling
- - -> Implicit modelling
Clinical benefit (QALY) → Treatment or Hb dependent outputs



© Does the model reflect the disease? Should it reflect non-inferiority?

Number of Hb-health states

Company based Hb categories on published literature

- Company chose 8 Hb categories Yarnoff et al. 2016, US cost-effectiveness paper of Hb targets for treating anaemia; Finkelstein et al. 2009 showing that Hb increase of 1 g/dL improves quality of life
- **ERG comments:**
 - Yarnoff et al
 - does not describe rationale for Hb categories – and bases categories on another study of transfusion burden with anaemia and CKD in US (Lawler et al. 2010)
 - Uses a microsimulation modelling → does not necessarily imply that 1 g/dL change in Hb level has meaningful impact on quality of life.
 - Finkelstein et al. demonstrated impact of Hb increase only for levels between <11, 11 to <12, 12 to <13, and ≥13 g/dL.
 - Concerns raised during company's model validation
 - Health economist: *“Model might be more robust with less (sic) categories. Do the Hb categories differ in terms of costs or HRQoL?”*
 - Clinician: *“Only 3 Hb ranges are needed: <10, 10–12 (UK target) and ≥12”.*

⊙ *Did the company source estimates systematically and appropriately?*

⊙ *Do all 8 Hb categories have discrete and distinguishable impacts on quality of life?*

Utilities for each health state

Company used additive approach to calculate health state utilities

- Company calculated utilities for each Hb state from general population age- and sex-adjusted values (Kind et al. 1999) then subtracting **utility decrements for**:
 - **Hb level** adjusted for CVD + type 1 diabetes from roxadustat trials data
 - **CKD and dialysis status** (from literature and technology appraisals)
 - **Adverse events** (from literature; applied every 3-month cycle)

	Utility decrement	Source
CKD		Kind et al. 1999, Ara and Brazier 2011
Haemodialysis	0.352	NICE TA358 (tolvaptan for autosomal dominant polycystic kidney disease)
Peritoneal dialysis	0.262	
Mild stroke	0.350	Meenan et al. 2007
Moderate stroke	0.500	
Severe stroke	0.730	
Myocardial infarction	0.120	Yarnoff et al. 2016
Vascular access thrombosis	0.100	Xue et al. 2010

- **ERG**: company adds utility decrements, but explores no alternatives e.g. multiplicative or min-max values) – multiplicative approach might be preferable

⊙ *Are health state utilities estimated appropriately? Do values have face-validity? Would committee wish to see scenarios?*

Hb level utility decrements

Company estimated Hb level disutilities using regression, but does not supply methods

- Company estimates decrements from roxadustat trials EQ-5D-5L cross-walked to EQ-5D-3L
 - generalised linear mixed model, controlled for cardiovascular disease + type 1 diabetes
 - study and subject ID included as random factors to control for nesting
 - missing data assumed ‘missing at random’
- **ERG:** company did not provide:
 - statistical analysis plan for regression analysis → unable to assess impact
 - amount or pattern of missing data → ERG questions ‘missing at random assumption’ → missing data could be because patients unwell and unable to complete EQ-5D questionnaire → higher utilities favour roxadustat

Health state	Utility decrement		Health state utility	
Hb <7				
Hb 7 to <8				
Hb 8 to <9				
Hb 9 to <10				
Hb 10 to <11				
Hb 11 to <12				
Hb 12 to <13				
Hb ≥13				

© *What is committee’s view on company’s regression and transparency?*

Distributing patients across Hb states over time

Company used multinomial logistic regression model

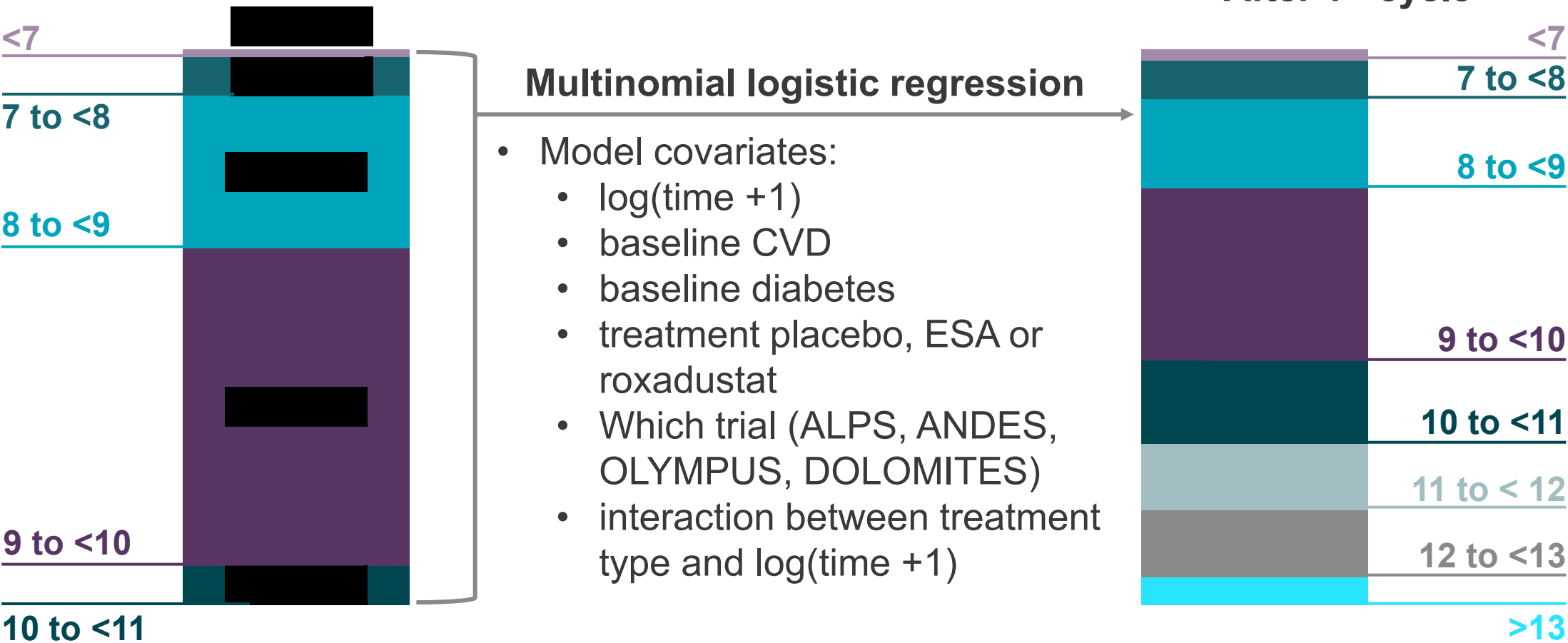
- Baseline - based on pooled trials
- Most patients allocated to 9 to < 10 g/dL state; [REDACTED]
- Multinomial logistic regression model confirmed with clinical experts

Distribution baseline

After 1st cycle

Multinomial logistic regression

- Model covariates:
 - log(time +1)
 - baseline CVD
 - baseline diabetes
 - treatment placebo, ESA or roxadustat
 - Which trial (ALPS, ANDES, OLYMPUS, DOLOMITES)
 - interaction between treatment type and log(time +1)



© What is committee's view on company's regression and transparency?

Extrapolating % of people in each state beyond trials

Company approach	ERG comments
No treatment waning	-
Controlling for study in regression	<ul style="list-style-type: none"> Pooling breaks randomisation → should interpret results as though data are observational
Covariates included: log(time+1) log(time+1) * treatment Used time dependency when extrapolating	<ul style="list-style-type: none"> Unclear whether time trends during trials hold over 25-year horizon, especially interaction treatment * time Raised by company during validation: “Can we predict Hb state occupancy over a 40-year period from a short-term duration trial?” Company did not provide analyses excluding time as covariate or interaction term, so impact unclear → ERG did scenario analyses with shorter horizons to check impact of time
Model included covariates not “statistically significant”	<ul style="list-style-type: none"> Company did not provide statistical analysis plan → ERG unable to assess impact unclear decision criteria to select and exclude candidate covariates and interaction terms
Multinomial logistic regression model	<ul style="list-style-type: none"> Not clear if this is the best model
Multinomial logistic regression model assessed visually by comparing predictions to observed data	<ul style="list-style-type: none"> Unclear how company interpreted visual inspection and suitability of multinomial logistic regression model

© Has the company adequately explained and justified its methods?

Extrapolating time to dialysis and to death

*Company assumed no difference between roxadustat and ESA;
unclear why company chose log-logistic and exponential functions*

- Used parametric survival models based on pooled roxadustat trials
- Time-to-dialysis
 - log-logistic ‘best function in terms of long-term clinical plausibility’
- Time-to-death
 - exponential ‘best BIC score, as well as long term clinical plausibility and a good visual fit’
- ERG: goodness of fit statistics (AIC/BIC) were very similar for the other regression models
 - Company did not provide statistical analysis plan for estimating regression models → ERG unable to assess impact

Function	Dialysis		Mortality	
	AIC	BIC	AIC	BIC
Log-logistic	19,300	19,346	6,796	6,874
Exponential	19,329	19,368	6,798	6,869
Weibull	19,330	19,375	6,796	6,874
Gompertz	19,325	19,370	6,797	6,875
Log-normal	19,323	19,368	6,804	6,882
Generalised gamma	19,303	19,355	6,798	6,882

- ⊙ *Has the company adequately explained and justified its methods?*
- ⊙ *Are log-logistic and exponential functions appropriate?*

Are times to dialysis and death plausible?

- Company estimated % of people alive and dialysing after 10 years at [REDACTED]
 - Haemodialysis (88%) and peritoneal dialysis (12%) based on DOLOMITES
 - Stated ‘clinical experts... deemed the long-term extrapolation values to be reasonable for a cohort with an average starting age of ~65 years’.
- **ERG:** DOLOMITES trial better than pooled trials for % of people alive at 5 and 10 years – closer to UK renal registry data (table below).

Time point	UK renal registry	Pooled trials	DOLOMITES trial
5 years	73%	[REDACTED]	[REDACTED]
10 years	56%	[REDACTED]	[REDACTED]

© Are the proportion of people on dialysis and alive plausible?

Hospitalisations

Company modelled hospitalisations indirectly based on adverse events

Company	ERG
<ul style="list-style-type: none"> • Do not expect roxadustat to affect hospitalisations • Most hospitalisations in trials because of 'adverse events' → modelling both would double count costs and quality of life • Similar rates of hospitalisation for roxadustat and ESA in DOLOMITES, justifies modelling hospitalisations through adverse events 	<ul style="list-style-type: none"> • Hospitalisation rates should be measured + modelled directly • Important to explore both expected AND unexpected adverse events. • [REDACTED] to [REDACTED] of hospitalisations not due to adverse events • Company suggests reasons for hospitalisation are always known • NICE guidance advised using indirect (surrogate) outcomes only when direct outcomes are not possible.

Cost of Roxadustat

- Company estimated roxadustat costs based on doses used during Hb correction phase (up to 3 months after treatment start) and Hb maintenance phases (after 3 months of treatment to lifetime)
 - Correction phase: weekly dose estimated from pooled roxadustat arms
 - Maintenance phase: weekly dose extrapolated using generalised linear mixed model (controlling for cardiovascular disease and type 1 diabetes)
- Company used roxadustat cost per mg (██████████) to calculate roxadustat cost per cycle

Hb level	Correction phase weekly dose	Maintenance phase weekly dose	Roxadustat cost 1 st cycle	Roxadustat cost subsequent cycles
<7	██████████	██████████	██████████	██████████
7 to <8	██████████	██████████	██████████	██████████
8 to <9	██████████	██████████	██████████	██████████
9 to <10	██████████	██████████	██████████	██████████
10 to <11	██████████	██████████	██████████	██████████
11 to <12	██████████	██████████	██████████	██████████
12 to <13	██████████	██████████	██████████	██████████
>13	██████████	██████████	██████████	██████████

*Reference Hb level to which increments or decrements in dose are applied to.

NICE © *Would Roxadustat stop at Hb of 12 g/dL as with ESAs?*

How company calculates costs of comparator

ESAs modelled as class; company unaware of discount to NHS

- Considers all 5 ESAs in British National Formulary (BNF) and assumes equal efficacy at equivalent doses
- Used darbepoetin alfa as reference; then used a 'dose conversion' based on weekly dose (in micrograms) for other ESAs from BNF
- % receiving each ESA from TUNE - observational retrospective study of medical records UK population. ERG: Uncertain → did scenarios analysis

ESA	Dose conversion ratio		% used in model	
1. Darbepoetin alfa - reference				
2. Epoetin alfa				
3. Epoetin beta				
4. Epoetin beta (methoxy polyethylene glycol)				
5. Epoetin zeta				

© *Is the distribution of ESAs from TUNE study generalisable to clinical practice?*

Costs of administering ESAs

Company included ESA administration costs for 20% of patients

Company assumed:

- 15% require home district nurse
- 5% require in-hospital administration

ERG:

- Company's figures based on clinical expert opinion → ERG did scenario analysis

© *Should administration costs be added to proportion of patients not on dialysis? Should a portion of people on roxadustat also incur charges?*

ERG base case and scenario analyses

Analysis	Description / assumptions
Base case	DOLOMITES data only instead of pooled trials
Scenario analyses	
Extrapolation of time trends from trials	<ul style="list-style-type: none">• Shorten time horizon to 5 years• Shorten time horizon to 10 years
Proportion of patients receiving each ESA agent	All patients receive <ul style="list-style-type: none">• darbepoetin alfa <i>or</i>• epoetin alfa <i>or</i>• epoetin beta <i>or</i>• epoetin beta (methoxy polyethylene glycol) <i>or</i>• epoetin zeta
ESA administration costs	Excluded

Innovation, equality issues and end of life criteria

Innovation	<ul style="list-style-type: none">• First-in-class hypoxia-inducible factor prolyl hydroxylase inhibitor• Provides additional treatment option for anaemia with CKD• May simplify management through mechanism of action that stimulates erythropoietin production and improves iron metabolism → may reduce need for iron transfusions• Oral administration versus IV or subcutaneous ESA → may reduce administration costs associated with ESA• Reduced requirements for cold-chain storage and special sharps disposals
Equalities	<ul style="list-style-type: none">• Home administration of ESA more challenging for people on low incomes, dexterity problems and English 2nd language
End-of-life	<ul style="list-style-type: none">• Company does not model a survival benefit

© *Is roxadustat innovative? Associated with inequalities? Meets end-of-life?*

Quality-adjusted life years (QALYs)

Incremental QALYs very small; ESAs have substantial discounts to NHS

Company base case analysis*

ERG base case analysis*

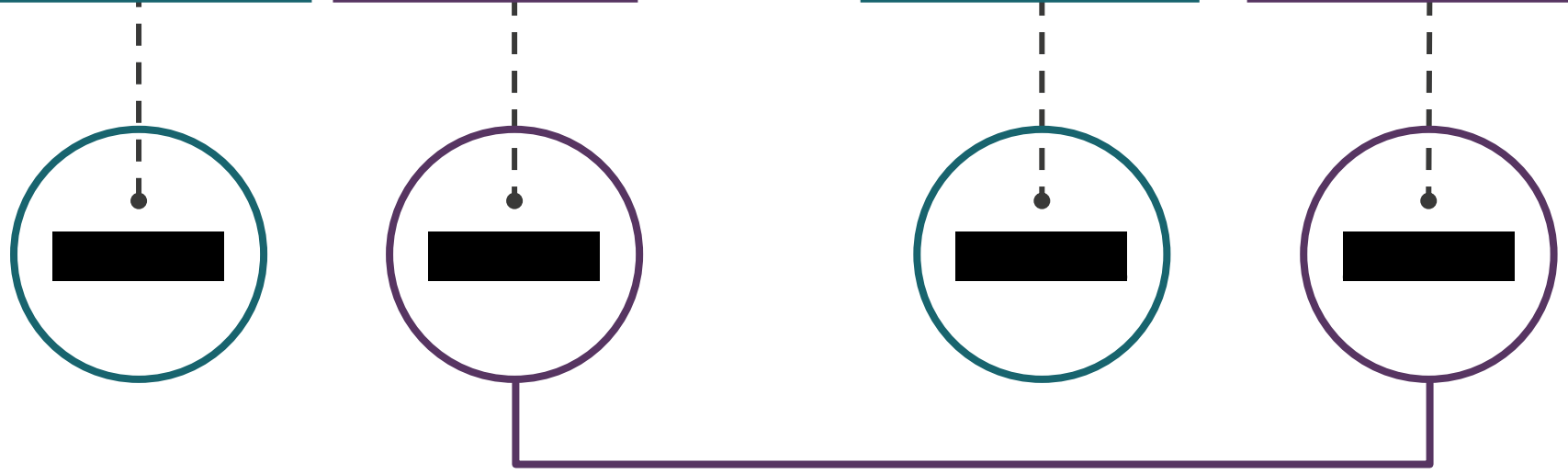
Roxadustat
(confidential
discount)



ESA
(list price)



Incremental



3-fold difference in QALY gains
between company and ERG base case

*Includes roxadustat confidential PAS discount and ESA list prices → analyses only shown to illustrate QALY differences for transparency, not used to inform committee decision-making.

Because of confidential discounts for ESAs, all cost-effectiveness analyses are presented in private Part 2

Appendix / back-up slides

Adverse events included in model

Including more adverse events may not change cost effectiveness

- Company explored impact of grade 3+ adverse events occurring in >3% of DOLOMITES trial population i.e. [REDACTED]

Adverse event	[REDACTED]	[REDACTED]	[REDACTED]	Total	Incremental
% patients					
Roxadustat	[REDACTED]	[REDACTED]	[REDACTED]		
ESA	[REDACTED]	[REDACTED]	[REDACTED]		
Cost / disutility per event (from TA622 [sotagliflozin for type 1 diabetes] and TA712 [enzalutamide for prostate cancer])					
Cost	£2,964	£2,526	£364		
Disutility	-0.00290	-0.00575	-0.00440		
Weighted cost					
Roxadustat	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
ESA	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Weighted disutility					
Roxadustat	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
ESA	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

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© *Should company model all adverse events?*