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HTA and Health Outcomes

Medical and Product Information: [REDACTED]

11th September 2009

Meindert Boysen
Centre for Health Technology Evaluation
National Institute for Health and Clinical Excellence
Level 1A, City Tower
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Manchester
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Dear Meindert,

Re: STA on Pemetrexed for the maintenance treatment of non small cell lung cancer – clarification regarding clinical and cost-effectiveness data

Please find attached part 2 of our response to the clarification questions. Part 1 of our response (individual patient data from the JMEN trial) has already been couriered to you on disc.

The response document (file “PemetrexedSTA_clarificationresponse_11thsept09.doc”) in itself does not contain any confidential information. The following attachments related to the data presented in the response are commercial in confidence:

[REDACTED]

I have also enclosed the Appendix E confidentiality form to document the confidential data in both Part 1 and Part 2 of our response.

If you have any further questions or need further clarifications, please do not hesitate to contact me.

Kind regards

Yours sincerely

[REDACTED]

Encl:

Lilly response to NICE clarification questions
(file "PemetrexedSTA_clarificationresponse_11thsept09.doc")

File "DOF_JMEN_grade3&4AEs_ITT.rtf"

File "nsqgr34_epri.rtf"

[REDACTED]

File "fqdisa17.rtf"

[REDACTED]

STA on pemetrexed in maintenance treatment of NSCLC

Lilly response to clarification questions

11th September 2009

Section A: General

A1 Adverse events

- a) Please provide the file “DOF_JMEN_grade3/4AEs_ITT_non-squamous”. Table 12 (in the manufacturer submission, pp. 52) references this file but the file is missing from the documentation provided.

Attached with this letter is the file “DOF_JMEN_grade3&4AEs_ITT.rtf” for all randomised patients, in support of Table 12 in the manufacturer’s submission and the file “nsqgr34rel_epi.rtf”, which summarises the incidence of grade 3/4 toxicities for the licensed non-squamous population, in support of Table 13 in the manufacturer’s submission.

Section B: Clarifications of the effectiveness data

B1 Subgroups

- a) Please provide overall survival (OS) and progression free survival (PFS) hazard ratios together with confidence intervals and the actual OS and PFS figures for the licensed non-squamous population for each of the following subgroups by trial arm:
- Disease stage (presenting outcomes for stage IIIb separately from stage IV)
 - Response status prior to maintenance therapy (presenting outcomes for patients assessed as complete response at the start of maintenance, separately from partial response patients and again separately for stable disease patients)
 - First-line treatment (presenting outcomes according to the first line regimen – so gemcitabine/cisplatin, docetaxel/cisplatin, paclitaxel/cisplatin, gemcitabine/carboplatin, docetaxel/carboplatin and paclitaxel/carboplatin patients analysed separately)
 - First-platinum treatment (cisplatin separately from carboplatin)
 - ECOG performance status (PS0 separately from PS1)

As specified in the original statistical analysis plan for the JMEN trial, Lilly conducted a pre-specified covariate-adjusted analysis using the Cox proportional hazards model stratified by non-platinum component of the induction therapy (section 6.3.5 of manufacturer’s submission). Additional data from these analyses are summarised in Table 1 and Table 2 below. The hazard ratios in these tables demonstrate the effect of each variable (eg, the risk of death is 31% lower for East Asians as compared to all other ethnicities within the trial).

Table 1. Covariate-adjusted final overall survival for non-squamous patients

Variable	HR (95% CI)	p-value ^c
(N=474 ^{a,b} , 328 events)		
Study treatment arm (pemetrexed versus placebo)	0.70 (0.56–0.88)	0.0021
ECOG performance status (0 versus 1)	1.23 (0.98–1.54)	0.0792
Cisplatin ^d (yes versus no)	1.04 (0.81–1.33)	0.7816
Induction response (PR/CR versus SD)	0.97 (0.77–1.22)	0.7721
East Asian (yes versus no)	0.69 (0.53–0.90)	0.0066
Nonsmoker (yes versus no)	0.90 (0.67–1.20)	0.4741
Gender (female versus male)	0.66 (0.50–0.87)	0.0035
Age (<65 years versus ≥65 years)	0.87 (0.69–1.10)	0.2537
Stage (IIIB versus IV)	1.12 (0.84–1.49)	0.4587

^aStratified by non-platinum component of induction therapy (gemcitabine versus paclitaxel/docetaxel)

^bSeven patients were excluded due to missing values for one or more cofactors

^cp-value is from chi-square test

^dDescription of platinum agent in induction regimen: all patients were treated with a platinum-based regimen, either with cisplatin (yes) or carboplatin (no)

CI = confidence interval; CR, complete response; ECOG, Eastern Cooperative Oncology Group; HR, hazard ratio; PR, partial response; SD, stable disease

Note: Analysis of overall survival was performed following final datalock in December 2008, subsequent to the histological reclassification of a total of three patients, including one patient who was initially classified as having adenocarcinoma, which was subsequently reclassified as squamous cell carcinoma

Table 2. Covariate-adjusted analysis for progression-free survival for non-squamous patients

Variable	Non-squamous	
	(N=475 ^{a,b} , 359 events)	
Variable	HR (95% CI)	p-value ^c
Study treatment arm (pemetrexed versus placebo)	0.45 (0.36–0.56)	<0.0001
ECOG PS (1 versus 0)	1.04 (0.84–1.29)	0.725
Induction response (PR/CR versus SD)	1.04 (0.83–1.30)	0.739
East Asian (yes versus no)	1.12 (0.87–1.42)	0.383
Nonsmoker (yes versus no)	1.02 (0.78–1.34)	0.861
Gender (female versus male)	0.77 (0.59–0.99)	0.040
Age (<65 versus ≥65 years)	1.19 (0.94–1.50)	0.153

^aStratified by non-platinum component of induction therapy (gemcitabine versus paclitaxel/docetaxel); nine patients were excluded due to missing values for one or more cofactors.

^bStratified by non-platinum component of induction therapy (gemcitabine versus paclitaxel/docetaxel); eight patients were excluded due to missing values for one or more cofactors (seven non-squamous patients and one squamous patient)

^cp-value is from the Mantel Haenszel chi-square test

CI, confidence interval; CR, complete response; ECOG, Eastern Cooperative Oncology Group; HR, hazard ratio; PR, partial response; PS, performance status; SD, stable disease

Note: Data analysis for progression-free survival was performed following the primary datalock in November 2007. Analysis of final overall survival was performed following final datalock in December 2008, subsequent to the histological classification of a total of three patients. However, the reclassification of these patients is not expected to impact the conclusions drawn from the primary analysis of progression-free survival.

Only ethnicity and gender were found to be statistically significant for overall survival, with females and East Asians (ie, Asian descent, but not from Indian subcontinent) deriving

better survival outcomes (Table 1). For progression-free survival, only gender was statistically significant, with females deriving better outcomes (Table 2). These factors have been previously shown to have favourable prognosis in advanced NSCLC, irrespective of treatment. On this basis, further exploration of subgroups within the economic modelling was not conducted as it was not likely to produce any significant further information or clarity in regards to the decision problem.

As can be seen in Table 3 below, the sample sizes of some of the requested subgroups are too small to provide robust analyses. For example, there were only 5 patients with complete response, all in the pemetrexed arm, and less than 20 patients in each arm for docetaxel/cisplatin, docetaxel/carboplatin or paclitaxel/cisplatin. Therefore, some subgroups have been merged, e.g. taxanes/platinum, to enable more meaningful analyses.

The requested subgroup analyses are provided in Table 4.

Table 3. Summary of select baseline characteristics and demographics for the non-squamous population in the JMEN study

	Non-squamous population (N=481)		
	Pemetrexed N=325	Placebo N=156	Total N=481
Disease stage prior to induction therapy ^a , n (%)			
Unknown	1 (0.3)	0 (0.0)	1 (0.2)
Stage IIIB	55 (16.9)	30 (19.2)	85 (17.7)
Stage IV	269 (82.8)	126 (80.8)	395 (82.1)
ECOG PS at randomisation ^b , n (%)			
Unknown	2 (0.6)	0 (0.0)	2 (0.4)
0	133 (40.9)	60 (38.5)	193 (40.1)
1	190 (58.5)	96 (61.5)	286 (59.4)
Best tumour response to induction therapy, n (%)			
Unknown	1 (0.3)	0 (0.0)	1 (0.2)
Complete response	5 (1.5)	0 (0.0)	5 (1.0)
Partial response	143 (44.0)	78 (50.0)	221 (45.9)
Stable disease	174 (53.5)	78 (50.0)	252 (52.4)
Progressive disease ^c	2 (0.6)	0 (0.0)	2 (0.4)
Specific induction regimen, n (%)			
Unknown	1 (0.3)	0 (0.0)	1 (0.2)
Docetaxel + carboplatin	14 (4.3)	6 (3.8)	20 (4.2)
Docetaxel + cisplatin	5 (1.5)	3 (1.9)	8 (1.7)
Gemcitabine + carboplatin	90 (27.7)	37 (23.7)	127 (26.4)
Gemcitabine + cisplatin	107 (32.9)	61 (39.1)	168 (34.9)
Paclitaxel + carboplatin	89 (27.4)	36 (23.1)	125 (26.0)
Paclitaxel + cisplatin	19 (5.8)	13 (8.3)	32 (6.7)

ECOG, Eastern Cooperative Oncology Group; PS, performance status

^aOne patient was missing disease stage status

^bTwo patients were missing performance status information

^cTwo patients were randomised but not treated due to progressive disease at the time of study entry

Note: Baseline characteristics presented here represent the baseline characteristics of the histological subgroups subsequent to the histological reclassification of a total of three patients following the initial datalock in November 2007 (including the reclassification of one patient in the pemetrexed-treated from adenocarcinoma to squamous cell carcinoma)

Table 4. Summary of efficacy parameters by subgroups, pemetrexed vs placebo for the non-squamous population in the JMEN study

Subgroup	N	Overall survival		Progression-free survival	
		Unadjusted hazard ratio (95%CI)	Median (months)	Unadjusted hazard ratio (95%CI)	Median (months)
Stage IIIB	85	0.52 (0.31-0.87)	17.5 vs 8.7	0.56 (0.33-0.94)	4.3 vs 1.6
Stage IV	395	0.75 (0.58-0.97)	15.0 vs 10.6	0.43 (0.33-0.55)	4.8 vs 2.7
Partial response to induction therapy	221	0.83 (0.59-1.15)	14.4 vs 11.7	0.45 (0.32-0.61)	4.6 vs 1.7
Partial or complete response* to induction therapy	226	0.81 (0.58-1.12)	14.4 vs 11.7	0.45 (0.33-0.61)	4.5 vs 1.7
Stable disease with induction therapy	252	0.61 (0.45-0.83)	16.6 vs 8.6	0.44 (0.32-0.61)	4.5 vs 2.8
Gemcitabine/cisplatin induction therapy	168	0.84 (0.57-1.24)	13.8 vs 11.0	0.48 (0.33-0.70)	4.2 vs 2.8
Gemcitabine/carboplatin induction therapy	127	0.75 (0.48-1.17)	14.0 vs 9.1	0.55 (0.36-0.84)	4.6 vs 1.6
Paclitaxel/carboplatin induction therapy	125	0.60 (0.39-0.94)	16.5 vs 9.1	0.41 (0.26-0.64)	4.7 vs 2.8
Paclitaxel/platinum* induction therapy	157	0.65 (0.44-0.96)	16.5 vs 10.3	0.43 (0.29-0.65)	4.6 vs 2.8
Taxane*/platinum* induction therapy	185	0.57 (0.40-0.82)	16.6 vs 9.1	0.36 (0.25-0.53)	4.8 vs 2.6
Cisplatin induction therapy	208	0.80 (0.56-1.12)	14.0 vs 11.5	0.48 (0.35-0.68)	4.1 vs 2.8
Carboplatin induction therapy	272	0.62 (0.46-0.83)	15.9 vs 8.8	0.42 (0.31-0.57)	5.0 vs 2.3
Performance status 0	193	0.57 (0.39-0.82)	17.7 vs 10.3	0.33 (0.23-0.48)	5.5 vs 1.6
Performance status 1	286	0.80 (0.60-1.06)	14.1 vs 10.6	0.53 (0.40-0.70)	4.3 vs 2.8

*Combination of requested subgroups due to small sample size of individual subgroups

The Kaplan-Meier curves for these subgroups are in the attached files ([CiC information removed](#))

The results in Table 4 suggest consistent benefit for pemetrexed across all subgroups, with hazard ratios ranging from 0.52 to 0.84, all <1. This range of point estimates is consistent with the assumption of a uniform effect of pemetrexed, but manifesting with statistical variation (as is typical of subgroup results in a clinical trial).

The following limitations should be considered when evaluating any one subgroup:

- this trial was not powered to demonstrate statistically significant benefit in these subgroups
- these analyses are not adjusted for potentially prognostic factors (e.g., gender) or other confounding factors

B2 Second-line therapy

- Please provide a breakdown of second-line therapy (for the licensed non-squamous population) by trial arm, explaining the reasons for second-line therapy (whether progression or adverse events or other reasons).
- Please provide further clarification and justification of the 18.5% cross over reported in the submission (did cross-over always occur after unblinding, and did it always count as second line treatment?).
- Please provide a breakdown of second-line therapy by stage of disease for the licensed non-squamous population.

d) Please also provide the mean and maximum number of second line chemotherapy cycles for each trial arm for the licensed non-squamous population.

a). Please refer to the first table in the attached file (CiC information removed) for a breakdown of subsequent therapies for the licensed population. Some of the agents may have been used as combination regimens or as third-line or later. However, the percentages of patients would still be representative of those who received second-line therapy. Commonly used agents are erlotinib, gefitinib, docetaxel and pemetrexed which have regulatory approvals as second-line agents in various geographies.

The reasons for initiating second-line therapy were not recorded in the clinical trial. However, the reasons for discontinuation of study therapy for the licensed population who received subsequent therapy are summarised in Table 5. The majority of patients discontinued study therapy due to progression.

Table 5. Summary of Reasons for Discontinuation for Patients Who Received Post-Discontinuation Therapy
Histology Subgroup: Adenocarcinoma, Large Cell Lung Cancer & Other or Indeterminate Histology

All Randomized Patients
H3E-MC-JMEN Final Overall Survival Analysis

Reasons for Discontinuation	Pemetrexed (N = 173)		Placebo (N = 105)		Total (N = 278)	
	n	(%)	n	(%)	n	(%)
Progressive Disease	133	(76.9)	100	(95.2)	233	(83.8)
Subject Decision	14	(8.1)	2	(1.9)	16	(5.8)
Adverse Event	13	(7.5)	1	(1.0)	14	(5.0)
Physician Decision	8	(4.6)	2	(1.9)	10	(3.6)
Entry Criteria Not Met	3	(1.7)	0	(0.0)	3	(1.1)
Protocol Violation	1	(0.6)	0	(0.0)	1	(0.4)

b). Following discontinuation of therapy, the investigator was unblinded to treatment assignment. Subsequent therapies were initiated at the investigator's discretion and therefore cross-over in the placebo arm to pemetrexed was an option.

c). Please refer to the second and third tables in the attached file (CiC information removed) for a breakdown of subsequent therapies for Stage IIIB and IV, respectively, for the licensed population. The percentage of patients who received subsequent therapies in the licensed population is consistent with the overall population.

The fourth and fifth tables summarise subsequent therapies for performance status 0 and 1, respectively, for the licensed population.

d). Duration of second-line therapy was not recorded in the clinical trial.

B3 Analysis by geographic region

- a) Please provide the results of any analyses undertaken by geographical region or centre for the licensed non-squamous population.

Table 6 summarises efficacy endpoints that have been analysed by geographic regions. As with Question B1, results are consistent among these regions, although the absolute values for overall survival are longer for the Asian region (consistent with the results presented in Table 1 for East Asian ethnicity). Again, these are the results for unadjusted analyses which did not account for potential differences in other baseline prognostic factors.

Table 6. Summary of Efficacy of Nonsquamous Population by Geographic Regions

	N	Unadjusted hazard ratio (95% CI)	Log-rank p-value	Pemetrexed	Placebo
EU region	230				
Overall survival		0.67 (0.49-0.92)	0.014		
Median (months)				13.8	8.1
One-year rate				55%	36%
Progression-free survival	231	0.48 (0.35-0.66)	<0.00001		
Median (months)				4.6	2.7
Non-Asian region	310				
Overall survival		0.67 (0.51-0.88)	0.004		
Median (months)				13.0	8.5
One-year rate				54%	36%
Overall survival from start of induction		0.68 (0.51-0.89)	0.006		
Median (months)				16.2	12.0
One-year rate				67%	49%
Asian region	171				
Overall survival		0.75 (0.51-1.10)	0.139		
Median (months)				18.9	13.8
One-year rate				71%	54%
Overall survival from start of induction		0.75 (0.51-1.10)	0.138		
Median (months)				21.9	17.1
One-year rate				81%	67%

EU region = Austria, Bulgaria, Croatia, Czech Republic, Germany, Greece, Hungary, Italy, Netherlands, Poland, Romania, Spain

Non-Asian region = EU region, Australia, Brazil, Turkey, US

Asian region = China, India, Korea, Taiwan

B4 Reasons for discontinuation

- a) Please provide information on reasons for discontinuation for the licensed non-squamous population for each trial arm

Please refer to the attached file “fqdisa17” for a summary of reasons for discontinuation for the licensed population. The results are similar to those for the overall population.

Section C: Clarifications of the economic data

C1 Individual patient data

- a) To allow for a probabilistic sensitivity analysis to be undertaken, please provide a limited anonymised extract of the individual patient data from the JMEN trial for each non-squamous patient as follows:
- unique anonymised patient identifier
 - trial arm (pemetrexed or placebo)
 - days from randomisation to disease progression/withdrawal or censoring re-progression/withdrawal
 - censoring for progression/withdrawal (yes/no)
 - days from randomisation to death or censoring re-death
 - censoring for death (yes/no)
 - cycles of trial medication administered
 - cycles of second-line chemotherapy administered
 - type of second-line chemotherapy administered (list agent(s) or state “none”)
 - days from randomisation to start of second-line chemotherapy
 - disease stage at baseline (IIIB/IV)
 - performance status at baseline (PS0/1)
 - histological sub-type (adeno/large cell/other)
 - response status prior to maintenance (complete response/partial response/stable disease)

The requested dataset has been sent separately (as part 1 of our response) on disc. The dataset is to be treated as “commercial in confidence” and to be destroyed following use. All requested variables have been included, except number of cycles of second-line therapy which were not recorded.

C2 Anti-emetic therapy

- a) Please provide the following for the licensed non-squamous population and for each trial arm:
- medications prescribed
 - duration of treatment for each episode
 - number of patients given anti-emetic therapy at any time
 - total number of anti-emetic treatment episodes (or the total number of patient cycles in which treatment was given)

The antiemetic medications reported for the licensed population are summarised in Table 7. With the exception of prochlorperazine, these agents are 5HT3 antagonists which are typically prescribed around the time of chemotherapy dosing and would thus be accounted for in the HRG for chemotherapy administration. The similar percentage of patients receiving anti-emetics in both study arms suggests that usage was part of an investigator's usual practice of prophylaxis.

Table 7. Summary of Antiemetic Drugs Taken On Study or Within 30 days of Discontinuation All Randomised non-squamous Patients

H3E-MC-JMEN

Drug Name	Pemetrexed (N=325)		Placebo (N=156)	
	n	%	n	%
Any	103	31.7	49	31.4
DOLASETRON	3	0.9	3	1.9
DOLASETRON MESILATE	4	1.2	2	1.3
GRANISETRON	26	8.0	21	13.5
ONDANSETRON	62	19.1	17	10.9
ONDANSETRON HYDROCHLORIDE			1	0.6
PALONOSETRON	1	0.3		
PROCHLORPERAZINE	9	2.8	1	0.6
RAMOSETRON	1	0.3	3	1.9
RAMOSETRON HYDROCHLORIDE			1	0.6
TROPISSETRON	15	4.6	10	6.4

Duration of antiemetic therapy and number of unique episodes are not available due to inconsistent reporting of start and stop dates and intermittent use of these agents. For example, the start date may correspond to the first cycle of therapy and the stop date with the last cycle.

Costs of these antiemetic agents are summarised in Table 8. The 5HT3 antagonists are recommended to be administered prior to chemotherapy as a single prophylactic dose. Pemetrexed is classified as having low emetic risk.

Table 8. Cost of antiemetic agents administered in JMEN (Source: BNF, March 2009, pp 224-227)

Drug	Presentation	Price	Standard dose*	Cost per daily dose	
Dolasetron 20mg/ml	0.625ml (12.5mg) amp	£4.00	n/a (for post-operative N/V)	-	
	5ml (100mg)	£13.00	100 mg	£13.00	
Granisetron					
	Tablets				
	1mg x 10 tablets	£65.49	2 mg	£13.10	
	2mg x 5 tablets	£65.49	2 mg	£13.10	
1mg/ml injection					
	1ml amp	£8.60	1 mg	£8.60	
	3ml amp	£25.79	1 mg	£8.60	
Ondansetron					
	Tablets				
		4mg x 30 tabs	£107.91	16 mg	£14.39
		8mg x 10 tabs	£71.94	16 mg	£14.39
Oral lyophilisates	4mg x 10 tabs	£35.97	16 mg	£14.39	

	8mg x 10 tabs	£71.94	16 mg	£14.39
Syrup	4mg/5ml x 50 ml	£35.97	16 mg	£14.39
Injection 2mg/ml	2ml amp	£5.99	8 mg	£11.98
	4 ml amp	£11.99	8 mg	£11.99
Suppositories	16mg x 1 supp	£14.39	16 mg	£14.39
Palonosetron 50mcg/ml	5ml amp	£55.89	0.25 mg	£55.89
Prochlorperazine**				
Generic	5mg tabs x 28 tabs	£2.09	Maximum 40 mg/day	£0.60
	5mg x 84 tabs	£4.14	Maximum 40 mg/day	£0.39
Stemetil	5mg x 84 tabs	£6.18	Maximum 40 mg/day	£0.59
	Syrup 5mg/5ml x 100ml	£3.48	Maximum 40 mg/day	£1.39
Injection 12.5mg/ml	1 ml amp	£0.54	Maximum 40 mg/day	£2.16
Tropisetron	Discontinued			
Ramosetron	Not in BNF			

*Recommended doses as prophylaxis (Multinational Association of Supportive Care in Cancer, March 2008)
http://data.memberclicks.com/site/mascc/MASCC_Guidelines_Update.pdf

** Prochlorperazine is not discussed in MASCC Guidelines. Doses are based on Stemetil product information
<http://emc.medicines.org.uk/medicine/16491>. Doses may be repeated on consecutive days.

C3 Dose reduction

a) Please provide the following for the licensed non-squamous population and for each trial arm:

- total number of planned cycles of trial medication
- total number of planned cycles where 100% of the planned dose was given
- total number of planned cycles where 75% of the planned dose was given
- total number of planned cycles where 50% of the planned dose was given
- total number of planned cycles where none of the planned dose was given (i.e. missed cycles)

There was no planned number of cycles; all patients were to be treated until progression. No doses were omitted. If the patient could not receive a dose within 42 days of the previous dose, the patient was discontinued from therapy. Table 9 summarises the intensity of each dose/cycle.

Table 9. Summary of dose intensity for all cycles of therapy

	Pemetrexed	placebo
100%	2527	707
90%	2	0
75%	21	2
50%	3	0
Total number of cycles	2553	709

C4 Hospitalisations

a) Please provide the summary information given in Table JMEN.12.10 of the Clinical Study Report (CSR_main, pp. 143) for the licensed non-squamous population.

b) Please provide further details of the hospitalisations the licensed non-squamous population as follows:

- time/cycle in which episode occurred
- length of stay
- description and HRG/DRG code for the episode
- any AEs related to the episode

Within the submitted economic analyses, HRG episodes were associated with grade 3/4 adverse events. There is significant variation in practice within the countries from which patients were included in the trial and therefore it is not considered appropriate to extrapolate hospital data to the UK population. For example one patient in China was hospitalised for 64 nights for chest pain.

In the clinical trial, some discharge dates were missing leading to extreme outliers by imputing the latest date that the patient was known not to be hospitalised (e.g., one patient with a missing discharge date was conservatively calculated to have a length of stay of 97 nights). When the hospitalisations with missing discharge dates are excluded (n=8), the average length of stay is reduced to a mean of 9.0 nights with a standard deviation of 8.9 nights and the median remains 7 nights. There were no missing dates for the drug-related AE hospitalisations.

a). Table 10 summarises AE-related hospitalisations for the licensed population. The number of percentage of patients hospitalised is low for both arms and the difference between arms is not significant for all or non-drug-related hospitalisations. These hospitalisations are attributable to co-morbidities and disease symptoms which occur regardless of treatment approach. Drug-related hospitalisations represent the minority of admissions.

Table 10. Summary of All Hospitalisations due to Adverse Events (on Study or Within 30 Days of Last Study Drug Dose)

All Nonsquamous Patients

	Pemetrexed (n=325)	Placebo (n=156)	P-value
Patients with at least 1 hospitalisation n (%)	51 (15.7)	20 (12.8)	0.493
All hospitalisations	73	22	
Mean (SD) length of stay (nights)	10.3 (14.0)	9.8 (5.4)	
Median (range) length of stay (nights)	7 (1-97)	9 (1-21)	
Patients hospitalised due to drug-related AEs n (%)	13 (4.0)	0	0.012
Hospitalisations involving drug-related events	15	0	
Mean (SD) length of stay (nights)	8.5 (5.9)	0	
Median (range) length of stay (nights)	6 (2-20)	0	
Patients hospitalised due to non-drug-related AEs n (%)	44 (13.5)	19 (12.2)	0.773
Hospitalisations not involving drug-related events	58	20	
Mean (SD) length of stay (nights)	10.7 (15.5)	10.1 (5.6)	
Median (range) length of stay (nights)	7 (1-97)	10 (1-21)	

Abbreviations: AE = adverse event; N = number of randomised patients; n = number of patients with event; SD = standard deviation

Notes: p-value from Fisher exact test. One placebo patient was hospitalised twice, but causality was not assessed; this patient's data are not included in results for drug-related and nondrug-related.

The mean and standard deviation values in Table 10 demonstrate the variation in practice and the difficulty in applying these data in a meaningful way to UK clinical practice within the economic model.

b. The types of adverse events causing hospitalisations are highly varied. For the drug-related hospitalisations, the most common adverse events were febrile neutropenia, followed by anaemia, mucositis and pneumonia. Other drug-related adverse events were neutropenia, urosepsis, venous thrombosis, renal failure and asthenia. For all hospitalisations, the most common adverse events were pneumonia+bronchitis+respiratory tract infections and dyspnea+respiratory failure.

C5 Adverse events

a) Please provide the number of episodes of toxicity as well as the number of patients suffering at least one episode (or the number of patient cycles involving an episode) for the licensed non-squamous population.

b) Table 12 of the Manufacturer's submission (MS, page 52) references the file "DOF_JMEN_grade3/4AEs_ITT_non-squamous" but this file is missing from the documentation provided. Please provide this table.

a). The percentage of patients experiencing grade 3/4 toxicity and the number of episodes are summarised in the attached file "nsqgr34rel_epi". For most toxicities, patients rarely experienced more than one episode.

b). Please see response for Section A1.

C6 Transfusions

a) Please provide information for the licensed non-squamous population together with the total number of each type of transfusion given (i.e where a patient receives multiple transfusions).

Twenty-nine pemetrexed patients and three placebo patients in the licensed population received transfusions. A summary of transfusions is provided in Table 11. The majority of transfusions were delivered in the outpatient setting.

Table 11. Summary of Transfusions On Study or Within 30 Days of Discontinuation All Randomized Nonsquamous Patients

H3E-MC-JMEN

Type of Transfusion	Pemetrexed (N=325)		Placebo (N=156)	
	Number of Patients	Number of Transfusions	Number of Patients	Number of Transfusions
Fresh Frozen Plasma (FFP)	1	1		
Packed Red Blood Cells (PRBC)	25	51	2	5
Platelets	2	2	1	1
Whole Blood	3	3		

C7 Type of scan patients received in the trial

a) Please provide information on the proportion of patients receiving chest-x ray, MRI and CT scan for the licensed non-squamous population and for each trial arm.

Table 12 summarises the methods of assessing lesions at baseline. Patients may have been monitored by multiple methods, but same methods were to be used throughout study. The vast majority of the patients were assessed with CT scans, the most common method being 'Spiral CT' (which compares well with UK practice) as it enables more effective examination of the lesions. Of the six patients without baseline methods, four were complete responders following induction therapy so therefore had no baseline lesions to assess and the other two did not receive study treatment (censored in PFS analysis).

Table 12. Summary of Baseline Lesion Methods of Measurement

All Randomized Nonsquamous Patients

H3E-MC-JMEN

Baseline Lesion Method of Measurement	Pemetrexed (N=325)		Placebo (N=156)	
	n	%	n	%
***	6	1.8		
BONE SCAN/CHSTXR/CT			1	0.6
BONE SCAN/MRI/SPIRAL CT	1	0.3	1	0.6
BONE SCAN/SPIRAL CT	26	8.0	9	5.8
CHSTXR/CT/SPIRAL CT			1	0.6
CHSTXR/PHYS/SPIRAL CT			1	0.6
CHSTXR/SPIRAL CT	1	0.3	1	0.6
CT	27	8.3	13	8.3
CT/MRI	1	0.3		
MRI	1	0.3	1	0.6
MRI/SPIRAL CT	6	1.8	3	1.9
PHYS/SPIRAL CT	3	0.9	3	1.9
SPIRAL CT	253	77.8	122	78.2

*** 6 patients had no baseline lesion measurements

Summary of Reasons for Discontinuation
 Histology Subgroup: Adenocarcinoma, Large Cell Lung Cancer & Other or Indeterminate Histology
 All Randomized Patients
 H3E-MC-JMEN Final Overall Survival Analysis

Reasons for Discontinuation	Pemetrexed (N = 325)		Placebo (N = 156)		Total (N = 481)	
	n	(%)	n	(%)	n	(%)
Progressive Disease	225	(69.2)	135	(86.5)	360	(74.8)
Subject Decision	37	(11.4)	6	(3.8)	43	(8.9)
Adverse Event	28	(8.6)	3	(1.9)	31	(6.4)
Physician Decision	17	(5.2)	4	(2.6)	21	(4.4)
Death	1	(0.3)	4	(2.6)	5	(1.0)
Due to Study Disease	1	(0.3)	3	(1.9)	4	(0.8)
Due to Adverse Event	0	(0.0)	1	(0.6)	1	(0.2)
Entry Criteria Not Met	5	(1.5)	0	(0.0)	5	(1.0)
Lost to follow up	2	(0.6)	1	(0.6)	3	(0.6)
Protocol Violation	2	(0.6)	1	(0.6)	3	(0.6)
Satisfactory Response	2	(0.6)	0	(0.0)	2	(0.4)

Abbreviations: N = total number of randomized patients; n = number of patients in each category.

Program Location: home/lillyce/prd/ly231514/h3e_mc_jmen/final/programs_stat/fqdisal
 Output Location: home/lillyce/prd/ly231514/h3e_mc_jmen/final/programs_stat/tfl_output/fqdisal7.rtf
 Data Location: home/lillyce/prd/ly231514/h3e_mc_jmen/final/data/shared/ads

PRODUCTION DATA - PRODUCTION MODE

16APR2008 02:17

Summary of Adverse Events Possibly Related to Study Drug (Grade 3 or 4 only)
 By CTCAE Term and Maximum Grade, On Study or Within 30 Days of Discontinuation
 All Randomized Patients
 H3E-MC-JMEN

CTCAE Term	Pemetrexed (N = 441)		Placebo (N = 222)		p-Value
	n	(%)	n	(%)	
Patients with >=1 Adverse Event	70	(15.9)	9	(4.1)	<.001
Patients with >=1 Laboratory Adverse Event	28	(6.3)	5	(2.3)	0.023
ALT, SGPT (serum glutamic pyruvic transaminase)	1	(0.2)	0	(0.0)	>.999
GGT (g-Glutamyl transpeptidase)	0	(0.0)	1	(0.5)	0.335
Hemoglobin	12	(2.7)	1	(0.5)	0.070
Leukocytes (total WBC)	7	(1.6)	1	(0.5)	0.279
Lymphopenia	1	(0.2)	1	(0.5)	>.999
Neutrophils/granulocytes (ANC/AGC)	13	(2.9)	0	(0.0)	0.006
Platelets	9	(2.0)	1	(0.5)	0.177
Patients with >=1 Non-Laboratory Adverse Event	54	(12.2)	4	(1.8)	<.001
Anorexia	8	(1.8)	0	(0.0)	0.057
Constipation	3	(0.7)	1	(0.5)	>.999
Constitutional Symptoms - Other	1	(0.2)	0	(0.0)	>.999
Cough	2	(0.5)	0	(0.0)	0.554
Cystitis	1	(0.2)	0	(0.0)	>.999
Dehydration	1	(0.2)	0	(0.0)	>.999
Dermatology/Skin - Other	2	(0.5)	0	(0.0)	0.554
Diarrhea	2	(0.5)	0	(0.0)	0.554
Distention/bloating,abdominal	1	(0.2)	1	(0.5)	>.999
Dyspnea (shortness of breath)	2	(0.5)	0	(0.0)	0.554

Abbreviations: CTCAE = common terminology criteria for adverse events; N = total number of randomized patients;
 n = number of patients in each category.

Note: Patients may be counted in more than one category.

CTCAE Version 3.0

p-Values from Fisher's Exact Test.

Program Location : CABINETS\SPREE\RMP\Clinical\Oncology\Alimta\NSCLC\H3E-MC-JMEN\CSR\PROGRAMS\FQCTCAC.sas
 Output Location : CABINETS\SPREE\RMP\Clinical\Oncology\Alimta\NSCLC\H3E-MC-JMEN\CSR\OUTPUTS\FQCTCAC1
 Data Set Location : RMP.SAS.H3ES.L.MCJMEN.ADS.INTRM2

PRODUCTION DATA - PRODUCTION MODE

16APR2008 02:17

Summary of Adverse Events Possibly Related to Study Drug (Grade 3 or 4 only)
By CTCAE Term and Maximum Grade, On Study or Within 30 Days of Discontinuation
All Randomized Patients
H3E-MC-JMEN

CTCAE Term	Pemetrexed (N = 441)		Placebo (N = 222)		p-Value
	n	(%)	n	(%)	
Fatigue (asthenia, lethargy, malaise)	22	(5.0)	1	(0.5)	0.001
Febrile neutropenia	3	(0.7)	0	(0.0)	0.555
Glomerular filtration rate	3	(0.7)	0	(0.0)	0.555
Hemorrhage, pulmonary/upper respiratory Nose	1	(0.2)	0	(0.0)	>.999
Hot flashes/flushes	1	(0.2)	0	(0.0)	>.999
Infection (clinical/microbio) - Gr 3/4	2	(0.5)	0	(0.0)	0.554
neutrophils-Pulmonary/Upper respiratory - Lung (pneumonia)					
Infection (clinical/microbio) - Gr 3/4	1	(0.2)	0	(0.0)	>.999
neutrophils-Renal/Genitourinary - Urinary tract NOS					
Infection with normal ANC/Gr 1/2 neutrophils-Pulmonary/Upper respiratory - Lung (pneumonia)	1	(0.2)	0	(0.0)	>.999
Mucositis/stomatitis (clinical exam) Anus	1	(0.2)	0	(0.0)	>.999
Mucositis/stomatitis (clinical exam) Oral cavity	2	(0.5)	0	(0.0)	0.554
Nausea	4	(0.9)	1	(0.5)	0.669
Neuropathy: sensory	3	(0.7)	0	(0.0)	0.555
Pain Musculoskeletal - Bone	1	(0.2)	0	(0.0)	>.999
Pain Musculoskeletal - Joint	1	(0.2)	0	(0.0)	>.999
Pain Pulmonary/Upper Respiratory - Chest/thorax NOS	1	(0.2)	0	(0.0)	>.999
Pneumonitis/pulmonary infiltrates	1	(0.2)	0	(0.0)	>.999
Pruritus/itching	3	(0.7)	0	(0.0)	0.555
Rash; acne/acneiform	1	(0.2)	0	(0.0)	>.999
Renal failure	2	(0.5)	0	(0.0)	0.554

Abbreviations: CTCAE = common terminology criteria for adverse events; N = total number of randomized patients;
n = number of patients in each category.

Note: Patients may be counted in more than one category.

CTCAE Version 3.0

p-Values from Fisher's Exact Test.

Program Location : CABINETS\SPREE\RMP\Clinical\Oncology\Alimta\NSCLC\H3E-MC-JMEN\CSR\PROGRAMS\FQCTCAC.sas
Output Location : CABINETS\SPREE\RMP\Clinical\Oncology\Alimta\NSCLC\H3E-MC-JMEN\CSR\OUTPUTS\FQCTCAC1
Data Set Location : RMP.SAS.H3ES.L.MCJMEN.ADS.INTRM2

PRODUCTION DATA - PRODUCTION MODE

16APR2008 02:17

Summary of Adverse Events Possibly Related to Study Drug (Grade 3 or 4 only)
By CTCAE Term and Maximum Grade, On Study or Within 30 Days of Discontinuation
All Randomized Patients
H3E-MC-JMEN

CTCAE Term	Pemetrexed (N = 441)		Placebo (N = 222)		p-Value
	n	(%)	n	(%)	
Renal/Genitourinary - Other	1	(0.2)	0	(0.0)	>.999
Rigors/chills	1	(0.2)	0	(0.0)	>.999
Thrombosis/embolism (vascular access-related)	1	(0.2)	0	(0.0)	>.999
Vomiting	1	(0.2)	0	(0.0)	>.999

Abbreviations: CTCAE = common terminology criteria for adverse events; N = total number of randomized patients;
n = number of patients in each category.

Note: Patients may be counted in more than one category.

CTCAE Version 3.0

p-Values from Fisher's Exact Test.

Program Location : CABINETS\SPREE\RMP\Clinical\Oncology\Alimta\NSCLC\H3E-MC-JMEN\CSR\PROGRAMS\FQCTCAC.sas
Output Location : CABINETS\SPREE\RMP\Clinical\Oncology\Alimta\NSCLC\H3E-MC-JMEN\CSR\OUTPUTS\FQCTCAC1
Data Set Location : RMP.SAS.H3ES.L.MCJMEN.ADS.INTRM2

Summary of Grade 3 or 4 Drug-Related Episodes
 All Randomized Nonsquamous Patients
 H3E-MC-JMEN

AECTC Term	Pemetrexed (N=325)		Placebo (N=156)	
	Patients n(%)	Episodes	Patients n(%)	Episodes
Laboratory Events				
GGT (g-Glutamyl transpeptidase)			1 (0.6)	1
Hemoglobin	8 (2.5)	9		
Leukocytes (total WBC)	4 (1.2)	5	1 (0.6)	1
Neutrophils/granulocytes (ANC/AGC)	9 (2.8)	14		
Platelets	6 (1.8)	6	1 (0.6)	1
Non-Laboratory Events				
Anorexia	3 (0.9)	3		
Constipation	1 (0.3)	1	1 (0.6)	1
Cough	1 (0.3)	1		
Cystitis	1 (0.3)	1		
Dermatology/Skin - Other	2 (0.6)	2		
Diarrhea	1 (0.3)	1		
Distention/bloating,abdominal	1 (0.3)	1	1 (0.6)	1
Fatigue (asthenia, lethargy, malaise)	12 (3.7)	12	1 (0.6)	1
Febrile neutropenia	3 (0.9)	3		
Glomerular filtration rate	2 (0.6)	2		
Hemorrhage, pulmonary/upper respiratory Nose	1 (0.3)	1		
Hot flashes/flushes	1 (0.3)	1		
Infection (clinical/microbio) - Gr 3/4 neutrophils-Pulmonary/Upper respiratory - Lung (pneumonia)	1 (0.3)	1		
Infection (clinical/microbio) - Gr 3/4 neutrophils-Renal/Genitourinary - Urinary tract NOS	1 (0.3)	1		
Infection with normal ANC/Gr 1/2 neutrophils-Pulmonary/Upper respiratory - Lung (pneumonia)	1 (0.3)	1		

Program Location : Home/lillyce/prd/ly231514/h3e_mc_jmen/intrm2/programs_stat/nsqgr34rel_epi.sas
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Summary of Grade 3 or 4 Drug-Related Episodes
 All Randomized Nonsquamous Patients
 H3E-MC-JMEN

AECTC Term	Pemetrexed (N=325)		Placebo (N=156)	
	Patients n(%)	Episodes	Patients n(%)	Episodes
Mucositis/stomatitis (clinical exam) Anus	1 (0.3)	1		
Mucositis/stomatitis (clinical exam) Oral cavity	2 (0.6)	2		
Nausea	2 (0.6)	2	1 (0.6)	1
Neuropathy: sensory	3 (0.9)	3		
Pain Musculoskeletal - Bone	1 (0.3)	1		
Pain Musculoskeletal - Joint	1 (0.3)	1		
Pain Pulmonary/Upper Respiratory - Chest/thorax NOS	1 (0.3)	1		
Pneumonitis/pulmonary infiltrates	1 (0.3)	1		
Pruritus/itching	2 (0.6)	2		
Rash; acne/acneiform	1 (0.3)	1		
Renal failure	1 (0.3)	1		
Renal/Genitourinary - Other	1 (0.3)	2		
Rigors/chills	1 (0.3)	1		
Thrombosis/embolism (vascular access-related)	1 (0.3)	1		
Vomiting	1 (0.3)	1		

Program Location : Home/lillyce/prd/ly231514/h3e_mc_jmen/intrm2/programs_stat/nsqgr34rel_epi.sas
 Output Location : Home/lillyce/prd/ly231514/h3e_mc_jmen/intrm2/programs_stat/tfl_output/nsqgr34rel_epi.rtf
 Data Set Location : Home/lillyce/prd/ly231514/h3e_mc_jmen/intrm2/data/shared/legacy_ads