

Pharmaceutical Phase III investments with uncertain reimbursement

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Outline of presentation:

- 1 Problem background
- 2 The model
- 3 Solving the model - General formulation
- 4 Solving the model - Logistic formulation
- 5 Application to a recent clinical trial
- 6 Possible extensions

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Problem background - IDEAL project

IDEAL = Integrated Design and Analysis of small population group trials

- EU project on statistical methodology in small population groups.
- Consortium of researchers from European universities, research institutes and industry.
- Work divided into 11 Work Packages.
- WP9:
 - Consider the clinical trial process from different stakeholder perspectives, using decision theory.
 - For Health Technology Providers (HTPs), what are the optimal trial designs given certain regulatory rules?
 - For regulatory authorities and payers: what are the appropriate incentives for the development of new treatments for small population groups?

Problem background - Clinical trials from the perspective of an HTP

Real pharmaceutical development consists of several stages:

- 1 Pre-clinical research.
- 2 Phase I, Phase II and Phase III clinical trials.
- 3 Approval by a Regulatory Authority (RA).
- 4 Reimbursement decision by a Health Care Insurer (HCI).
- 5 Use by patients (upon recommendation by physicians).

We will consider an HTP at the start of Phase III.

The model - Overview of decision process

■ Stage 0

- 1 The HTP chooses a sample size n . Trial cost = $I_0 + dn$.
- 2 The trial results in an efficacy estimate $\bar{X} = \bar{x}$.⁴
- 3 Based on n and \bar{x} , the RA accepts or rejects the new treatment.

■ Stage 1 (only reached upon RA approval in Stage 0)

- 1 The HTP suggests an incremental price c per patient.
- 2 Based on c and \bar{x} , the HCI decides whether or not to pay.

⁴Realisations of RVs are denoted by small letters, so \bar{x} denotes a particular realisation of \bar{X} .

The model - Statistical model for the trial data

- Given the true incremental efficacy μ , trial estimate is assumed normal:

$$\bar{X} \mid \mu \sim \text{N} \left(\mu, \frac{\sigma^2}{n} \right).$$

- Before the trial, the HTP encodes its knowledge as a conjugate normal prior distribution:

$$\mu \sim \text{N} \left(\mu_0, \sigma_0^2 \right).$$

- It follows that the prior predictive distribution for \bar{X} is

$$\bar{X} \sim \text{N} \left(\mu_0, \sigma_0^2 + \frac{\sigma^2}{n} \right).$$

The model - Decision rule of the Regulatory Authority (Stage 0)

The RA is assumed to approve the new treatment if

- 1 There is a sufficient amount of evidence: $n \geq n_{\min}$.
- 2 Superiority to control can be shown at a certain one-sided level of statistical significance, α :

$$\bar{X} > h(n) \equiv \frac{z_{\alpha}\sigma}{\sqrt{n}}, \text{ where}$$
$$z_{\alpha} = \Phi^{-1}(1 - \alpha).$$

Real world examples of RAs:

- In the EU, EMA, the European Medicines Agency.
- In the US, FDA, the Food and Drug Administration.

The model - Decision rule of the Health Care Insurer (Stage 1)

- The new treatment is reimbursed if and only if the Incremental Cost-Effectiveness Ratio (ICER) is below the HCI's Cost-Effectiveness Threshold (CET),

$$\text{ICER} = \frac{C}{X} < \Lambda = \text{CET}.$$

- Assume that the distribution for the CET has the form

$$F_{\Lambda}(\lambda) = F\left(\frac{\lambda - \nu}{\omega}\right).$$

- Example: National Institute for Health and Care Excellence (NICE) in the UK.

The model - Assumptions on F

Letting

$f \equiv F'$ be the density and
 $r \equiv f/(1 - F)$ the failure rate

corresponding to F , it is assumed that

$$0 < F < 1,$$

$$F \in \mathcal{C}^{(2)},$$

$$|\mathbb{E}_F| < \infty,$$

$$r' > 0.$$

From the HTP's perspective, the probability P that a certain suggested price c will lead to reimbursement is then

$$P(c, \bar{x}, \nu, \omega) \equiv \mathbb{P} \left(\frac{c}{\bar{x}} < \Lambda \right) = 1 - F \left(\frac{c/\bar{x} - \nu}{\omega} \right).$$

Solving the model - Backward induction

The optimal policy for the HTP is constructed using backward induction.

- 1 For each potential $\bar{x} > h(n)$, find the optimal price c^* for Stage 1.
- 2 Find the optimal sample size n^* for Stage 0, under the assumption that, whatever the actual value \bar{x} observed for \bar{X} , the choice in Stage 1 will be the optimal c^* .

Solving the model - Choice of optimal price in Stage 1

For a total patient population size k , the Stage 1 profit is

$$\begin{cases} k(c - c_p(k)) & \text{if the HCI accepts the price, and} \\ 0 & \text{if the HCI does not accept the price,} \end{cases}$$

where $c_p(k) \equiv l_1/k + b > 0$ is the production cost per patient.

The expected Stage 1 profit of the HTP is then

$$\Gamma_1(c, \bar{x}, \nu, \omega, k) \equiv k(c - c_p(k)) P(c, \bar{x}, \nu, \omega),$$

and the optimisation problem becomes

$$\max_{c \geq 0} \Gamma_1 \iff \max_{c \geq 0} \{k(c - c_p(k)) P(c, \bar{x}, \nu, \omega)\}.$$

Solving the model - Properties of the optimal price

From the assumptions placed on F , it may be shown that

- 1 there exists a unique solution, $c^*(\bar{x}, \nu, \omega, k)$ to $\max_{c \geq 0} k(c - c_p(k))P$,
- 2 which also solves $P + (c - c_p(k)) \frac{\partial P}{\partial c} = 0$, satisfying
- 3 $c^* > c_p(k)$,
- 4 $c^* \in \mathcal{C}^1$,
- 5 $\frac{\partial c^*}{\partial \bar{x}} > 0$, $\frac{\partial c^*}{\partial \nu} > 0$ and $\frac{\partial c^*}{\partial k} < 0$.

Solving the model - Properties of the optimal Stage 1 profit

Letting

$$\Gamma_1^*(\bar{x}, \nu, \omega, k) = \Gamma_1(\mathbf{c}^*(\bar{x}, \nu, \omega, k), \bar{x}, \nu, \omega, k),$$

the envelope theorem implies that

$$\frac{\partial \Gamma_1^*}{\partial \bar{x}} > 0, \quad \frac{\partial \Gamma_1^*}{\partial \nu} > 0, \quad \frac{\partial \Gamma_1^*}{\partial k} > 0,$$
$$\frac{\partial \Gamma_1^*}{\partial \omega} \text{ is } \begin{cases} < 0 \text{ if } \mathbf{c}^* < \bar{x}\nu, \\ = 0 \text{ if } \mathbf{c}^* = \bar{x}\nu, \\ > 0 \text{ if } \mathbf{c}^* > \bar{x}\nu. \end{cases}$$

Solving the model - Choice of optimal sample size

Let

$$\begin{aligned}\Gamma_0(n, \nu, \omega, k) &= \mathbb{E} \left[\Gamma_1^* (\bar{X}, \nu, \omega, k) \mathbb{I} (\bar{X} > h(n)) \right] - (l_0 + dn) \\ &= \int_{h(n)}^{\infty} \Gamma_1^* (\bar{x}, \nu, \omega, k) \pi_n(\bar{x}) d\bar{x} - (l_0 + dn)\end{aligned}$$

be the expected utility of choosing a sample of size n and continue optimally in Stage 1.

The Stage 0 optimisation problem is then

$$\max_{n \geq n_{\min}} \Gamma_0(n, \nu, \omega, k).$$

The optimal sample size is denoted by n^* , with a corresponding optimal Stage 1 profit Γ_1^* .

A logistic model for P : Functional form (1)

Assume the logistic model:

$$P(c, \bar{x}, \nu, \omega) = \left(1 + \exp \left(\frac{c/\bar{x} - \nu}{\omega} \right) \right)^{-1}.$$

Chosen for two reasons:

- 1 A logistic regression model for the CET used by NICE has recently been published by the CHE⁵.
- 2 The logistic form allows for solving the Stage 1 FONC in terms of the Lambert W function. This function is defined implicitly so that $z = W(z) \exp(W(z))$.

A logistic model for P : Functional form (2)

Using the properties of W , it may be shown that

$$c^* = c_p(k) + \bar{x}\omega \left[1 + W \left(\exp \left(\frac{\nu - c_p(k)/\bar{x}}{\omega} - 1 \right) \right) \right],$$

$$\Gamma_1^* = k\bar{x}\omega W \left(\exp \left(\frac{\nu - c_p(k)/\bar{x}}{\omega} - 1 \right) \right).$$

A logistic model for P : Dependence of c^* and Γ_1^* on ω

For constants $\beta_c \approx 5.87$ (found numerically) and $\beta_{\Gamma_1} = 2$:

$$\begin{aligned} \frac{\partial c^*}{\partial \omega} &< 0 \text{ if } \omega < \check{\omega}_c, & \frac{\partial \Gamma_1^*}{\partial \omega} &< 0 \text{ if } \omega < \check{\omega}_{\Gamma_1}, \\ \frac{\partial c^*}{\partial \omega} &= 0 \text{ if } \omega = \check{\omega}_c, & \frac{\partial \Gamma_1^*}{\partial \omega} &= 0 \text{ if } \omega = \check{\omega}_{\Gamma_1}, \\ \frac{\partial c^*}{\partial \omega} &> 0 \text{ if } \omega > \check{\omega}_c, & \frac{\partial \Gamma_1^*}{\partial \omega} &> 0 \text{ if } \omega > \check{\omega}_{\Gamma_1}, \end{aligned}$$

$$\text{where : } \check{\omega}_c = \frac{\nu - c_p(k)/\bar{x}}{\beta_c}, \quad \check{\omega}_{\Gamma_1} = \frac{\nu - c_p(k)/\bar{x}}{\beta_{\Gamma_1}}.$$

Two qualitatively different cases may be distinguished:

- 1 $\bar{x}\nu \leq c_p(k)$: both c^* and Γ_1^* are strictly increasing in ω .
- 2 $\bar{x}\nu > c_p(k)$: both c^* and Γ_1^* are first decreasing and then increasing in ω . c^* has a strict global minimum at $\check{\omega}_c$ and Γ_1^* has a strict global minimum at $\check{\omega}_{\Gamma_1}$.

Application - Indication and treatment

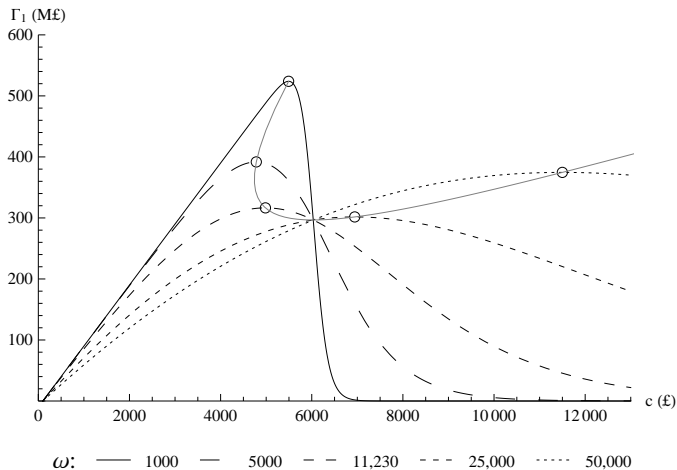
- HCl deciding on cost-effectiveness: NICE in the UK.
- Proposed new medication: mannitol dry powder (Bronchitol).
- Indication (disease): Cystic fibrosis, a genetic disorder that mostly affects the lungs.
- Estimated prevalence: 12.6 per 100,000 in Europe.

Application - Parameter values

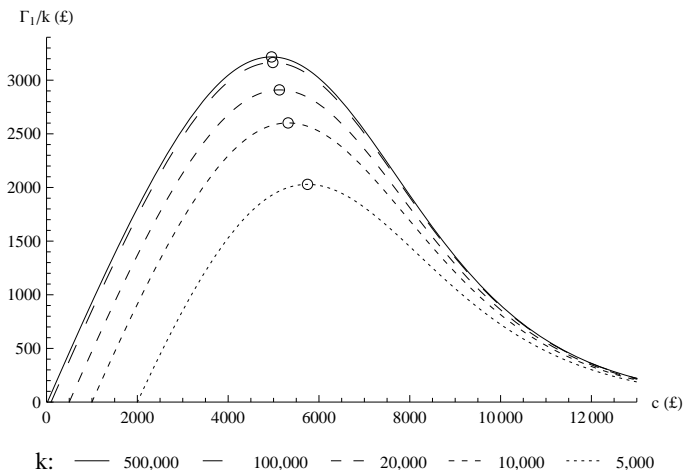
- The prior parameters μ_0 , σ_0 and the population standard deviation σ were chosen to be consistent with a previous trial (Bilton et al., 2011).
- ν and ω estimated from a recent study (Dakin et al., 2014), giving $\nu = \text{£}39,417/\text{QALY}^6$ and $\omega = \text{£}11,230/\text{QALY}$.
- l_1 , b , l_0 and d chosen as typical values for the pharma. industry.
- k was estimated as the product of the approximate prevalence in the UK (10,000) and the market exclusivity horizon (10 years in the EU), giving $k = 100,000$.

⁶Quality Adjusted Life-Year

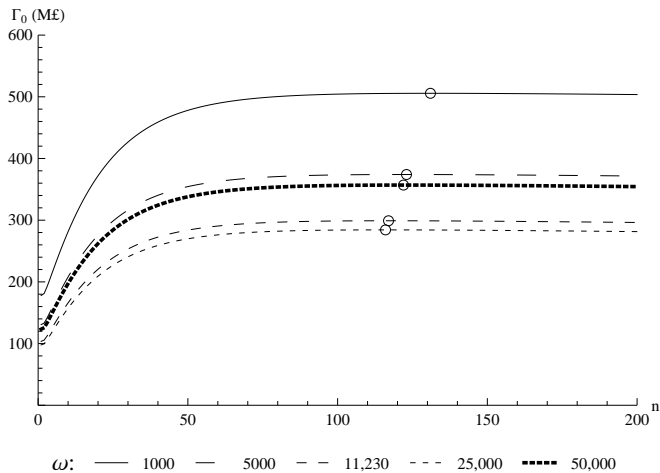
Application - Stage 1 expected profit as a function of c (different ω)



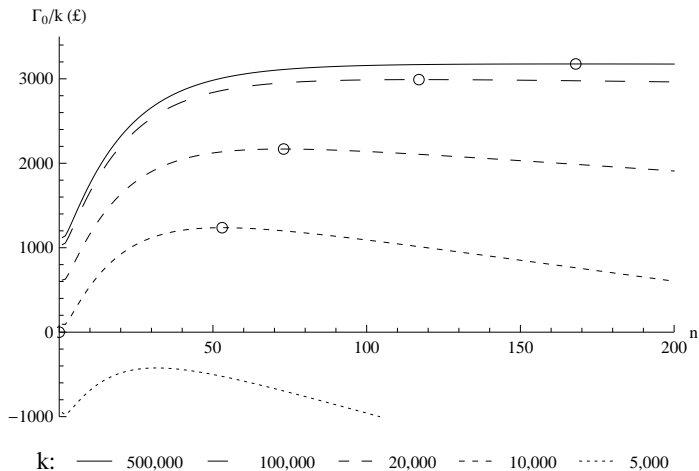
Application - Stage 1 expected profit (per patient-year) as a function of c (different k)



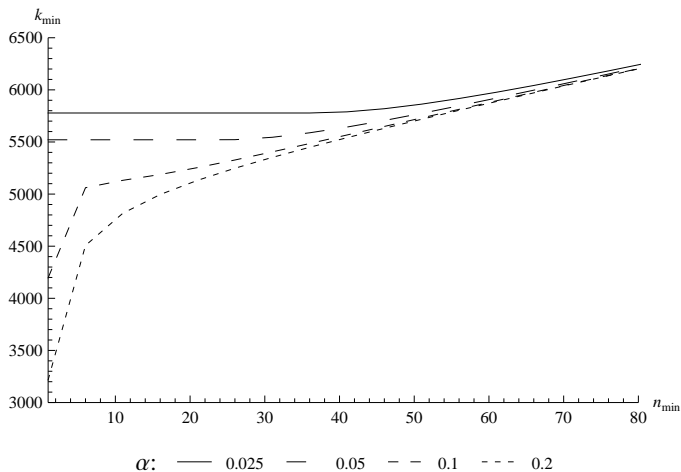
Application - Stage 0 expected profit as a function of n (different ω)



Application - Stage 0 expected profit (per patient-year) as a function of n (different k)



Application - k_{\min} as a function of n_{\min} for different α



Extensions

- Allow P to depend on n , k and disease area.
- Consider several HCIs when the price is set in Stage 1.
- Include bargaining process in Stage 1.
- Extend clinical trial model to also include Phase I and Phase II.
- Switch perspective to other stakeholders.
 - How can the parameters of this model be changed to increase willingness to invest in development for rare diseases?
 - Is a different regulatory structure needed?

Thank you!