# Systematic Review of Comparative Effectiveness Data for Oncology Orphan Drugs

Mindy M. Cheng, MS; Scott D. Ramsey, MD, PhD; Emily Beth Devine, PharmD, MBA, PhD; Louis P. Garrison, PhD; Brian W. Bresnahan, PhD; and David L. Veenstra, PharmD, PhD

omparative effectiveness research (CER) can be described as the assessment of a medical intervention against alternative interventions with the intent of identifying treatment strategies that are likely to have preferable benefit-risk profiles or are considered cost-effective in real-world clinical settings. The purpose of CER is to assist healthcare providers, payers, patients, and decision makers in making informed healthcare decisions that will improve individual and population health.<sup>1</sup>

Definitions of a rare disease differ around the world and the prevalence threshold varies between countries.<sup>2</sup> In the European Union, a disease is considered rare if it affects fewer than 215,000 individuals, while in the United States, a rare disease is described as a condition with prevalence of less than 200,000 or a disease with distinct subpopulations consisting of fewer than 200,000 individuals nationwide.<sup>2,3</sup> As of 2010, 362 drugs indicated for rare diseases (orphan drugs) have received US Food and Drug Administration (FDA) market approval, and oncology therapies comprise the largest clinical subcategory.<sup>4</sup> In general, orphan drugs have relatively higher costs than other drugs because manufacturers must rely on smaller patient populations to recoup development investments. In the United States, 15 orphan drugs were commercialized between 2006 and 2008; 6 of these cost more than \$100,000 per patient per year.<sup>5</sup>

Previous studies have suggested that orphan drugs have less robust bodies of evidence because smaller patient populations and limited knowledge of rare conditions constrain the design, conduct, analysis, and interpretation of clinical trials.<sup>2,6,7</sup> Due to the rapid rate of oncology orphan drug development and the significant financial burden associated with cancer treatments, there have been increasing pressures on drug manufacturers to demonstrate the value of their products. Less robust bodies of evidence will present particular challenges to CER and will make decision making about orphan drug accessibility difficult. The comparative effectiveness data supporting oncology orphan drugs marketed in the United States have not been well studied. The primary objective of this study was to systematically and critically assess the level and quality of clinical and economic evidence currently available for all oncology orphan drugs marketed in the United States. A second-

In this article Take-Away Points / p48 www.ajmc.com Full text and PDF **Objectives:** To systematically assess clinical and economic evidence for oncology orphan drugs marketed in the United States and to highlight the challenges and opportunities for evidence development within this pharmaceutical category. **Study Design:** Systematic review.

Methods: We conducted systematic literature searches of the Medline and Embase databases for clinical and cost-effectiveness studies published before June 2010 for all oncology orphan drugs marketed in the United States. We used the Grading of Recommendations Assessment, Development and Evaluation method and the Quality of Health Economic Studies criteria to assess the quality of the selected studies.

**Results:** We identified 60 randomized controlled trials and 21 cost-effectiveness analyses to support 47 oncology orphan drugs. A total of 21 drugs had moderate or high-quality bodies of clinical evidence, 11 had low-quality or very low quality clinical evidence, and 15 drugs could not be evaluated because we were unable to identify clinical evidence that met our inclusion criteria. The Spearman rank correlation coefficient for the level of evidence for oncology orphan drugs and disease prevalence was 0.3 (95% confidence interval, 0.0-0.5). The cost-effectiveness analyses received quality scores between 72 and 100 (range 0-100), with a mean score of 85.

**Conclusions:** The results of our study show that oncology orphan drugs marketed in the United States have varying levels and quality of clinical evidence and a paucity of evidence regarding economic value. Innovative analytic and policy approaches are needed to develop and implement a decision-making framework for this pharmaceutical category that is consistent with evidence-based medicine and comparative effectiveness research.

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### **Take-Away Points**

We conducted a systematic literature review to critically assess the clinical and economic evidence supporting oncology orphan drugs marketed in the United States.

- Oncology orphan drugs marketed in the United States have varying levels and quality
- of clinical evidence, and a paucity of evidence demonstrating their economic value.
- The current levels of clinical and economic evidence present challenges for decision making about oncology orphan drug availability and accessibility.

Innovative analytic and policy approaches are necessary to develop and implement a decision-making framework for oncology orphan drugs that is consistent with evidence-based medicine and comparative effectiveness research.

### METHODS

The Cumulative List of Designated Approved Orphan Products (www.fda.gov/orphan/designate/allap.rtf) describes drug products that have received orphan designation and have ever received marketing approval from the FDA.

We used this list, updated May 5, 2009, by the FDA, to identify products indicated to treat rare cancers. Orphan products indicated for diagnosis, palliative care, or treatment of secondary conditions associated with cancer, such as neutropenia, were not included in this study. Any product withdrawn or discontinued from the US market as of June 2010 was also excluded.

For each oncology orphan drug included in this study, we conducted a literature search in the Medline and Embase databases for randomized controlled trials (RCTs) and cost-effectiveness analyses published prior to June 2010, using search terms that included the drug's US brand name, generic name, disease indication, and the terms "randomized," "efficacy," "cost-effectiveness," and "economic." Our priority was to identify RCTs, but we also used the literature search to identify observational studies (prospective or retrospective) or other studies that described the treatment effect of the drug. We also identified published articles through information provided on the FDA Web site for new drug approvals and manual searches of article references. We defined costeffectiveness analysis using the definition established by the Panel on Cost-Effectiveness in Health and Medicine as "An analytic tool in which costs and effects of a program and at least one alternative are calculated and presented in a ratio of incremental cost to incremental effect."8

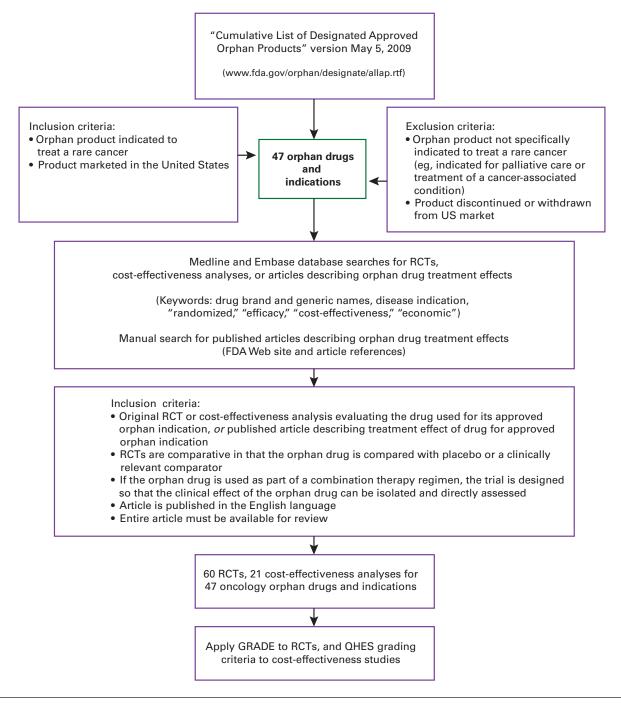
For each literature search, 1 author (MMC) reviewed all of the titles and abstracts of studies likely to meet the following inclusion criteria: (1) original RCT or cost-effectiveness analysis evaluating the orphan drug used for its approved orphan indication, or observational study or published article describing the treatment effect of the orphan drug used for its approved orphan indication; (2) comparative RCTs in which the orphan drug is compared with placebo or a clinically relevant comparator; (3) if the orphan drug (eg, drug A) is used as part of a combination therapy regimen, the trial is designed so that the clinical effect of the orphan drug can be isolated and directly assessed (eg, drugs A, B, and C vs drugs B and C); (4) article is published in the English language; and (5) entire article is available for review. **Figure 1** presents a flow diagram that describes the literature search methods and the restrictions applied to our search.

For each clinical study that met the inclusion criteria, we abstracted information about the comparator, patient characteristics, study design and treatment allocation, primary outcome measure, statistical analytic method, reporting of treatment effect with uncertainty, and study sponsor. For each cost-effectiveness analysis that met the inclusion criteria, we abstracted information about the comparator, study perspective, methods, data sources, primary outcome measure, base-case and sensitivity analysis results, and study sponsor (if reported).

We used the Grading of Recommendations Assessment, Development and Evaluation (GRADE) method, an evaluation system created by a diverse group of international guideline developers, to assess the quality of clinical bodies of evidence. The GRADE system assesses the quality of a body of evidence by focusing on 4 main components: study design, quality, consistency of evidence, and directness of comparator, population, and intervention. The method also evaluates limitations, potential biases, and uncertainty to assign 1 of 4 possible grades: high, moderate, low, and very low.9,10 We adapted the grading system to our study by including a fifth grade category, "not able to assess," to describe circumstances where we could not identify published studies that met our inclusion criteria. Table 1 details the GRADE methodology and how it was implemented in this study, and defines each quality grade.

We used the Quality of Health Economic Studies (QHES) grading criteria, a validated quantitative instrument developed by health economists, to assess the quality of cost-effectiveness studies. The QHES grading system consists of 16 criteria that are described in **Table 2**.<sup>11</sup> Each criterion is associated with a weighted score that was assigned in its entirety for each criterion perceived by the lead author to be satisfactory. Zero points were assigned to each criteria, such as subgroup analysis, were not applicable for all studies. In these circumstances, we used both a best-case and worst-case scoring method where full points and zero points were assigned to each inapplicable criterion. The weighted scores were summed across all criteria for a total of 100 possible points for each study.

### **Figure 1.** Oncology Orphan Drug Identification and Literature Search Methods



FDA indicates US Food and Drug Administration; GRADE, Grading of Recommendations Assessment, Development and Evaluation; QHES, Quality of Health Economic Studies; RCT, randomized controlled trial.

We graphically explored whether disease prevalence was associated with the level and quality of evidence for oncology orphan drugs and calculated the Spearman rank correlation coefficient to estimate the strength of the relationship. We obtained estimates of disease prevalence from Orphanet, an electronic reference for rare disease information in Europe (www.orpha.net).<sup>12</sup> This resource was the only one we identified that provided a collection of prevalence estimates for rare diseases. Although the data were derived in Europe, we believe the estimates are of similar magnitude in the

## POLICY

### **Table 1.** Implementation of GRADE Method and Definition of GRADE Levels<sup>a</sup>

1. Assign an initial rating to the body of evidence based on study design. A body of evidence that consists of at least 1 RCT starts HIGH. A body of evidence that consists of no RCT [that meets inclusion criteria], but at least 1 observational study that describes the treatment effect of the drug, starts LOW.

#### 2. Assess study limitations (risk of bias). Subtract 1 to 2 levels based on significance:

Examples of potential limitations:

- Failure to recruit predetermined sample size, failure to adhere to recruitment protocol.
- · Loss to follow-up and/or failure to adhere to intention-to-treat principle.
- Selective outcome reporting, or inadequate analysis or reporting of study outcomes.
- Early stoppage of trial or failure to adhere to preestablished stopping rules.

#### 3. Assess inconsistency of results. Subtract 1 level for significant inconsistency:

 Unexplained and widely differing treatment effects of 1 drug between different studies (consider indicated population, dosage, and primary outcome).

#### 4. Assess indirectness of evidence. Subtract 1 to 2 levels based on significance:

 Indirect or irrelevant outcomes, use of surrogate outcomes that may not reflect true clinical benefits or were not explicitly confirmed to be correlated with clinical benefit.

#### 5. Assess imprecision. Subtract 1 level if significant:

• Wide confidence intervals, lack of power, large uncertainty in results.

#### 6. Assess potential reporting bias. Subtract 1 level if significant:

- Evidence of publication bias.
- Evidence of any potential bias that was not explicitly addressed.

# 7. Assess additional considerations that could raise the quality of a body of evidence. Add 1 or 2 levels depending on magnitude of effect or significance:

 Strong evidence of association and/or effect from observational studies with no plausible confounders or significant threats to validity.

#### 8. Assign final GRADE:

**High.** Further research is very unlikely to change our confidence in the estimate of effect. (RCTs had no limitations and had consistent, precise, and directly applicable results without evidence of reporting bias. Comparative observational studies had no threats to validity and yielded very large effects.)

**Moderate.** Further research is likely to have an important impact on our confidence in the estimate of effect and may change the estimate. (RCTs had important limitations, inconsistencies, impreciseness, or evidence of reporting bias. Observational studies had no threats to validity and yielded moderate effects or evidence of a dose-response gradient.)

Low. Further research is very likely to have an important impact on our confidence in the estimate of effect and is likely to change the estimate. (RCTs had very serious limitations, or observational studies had no threats to validity but yielded small effects.)

Very low. Any estimate of effect is very uncertain. (RCTs and observational studies had very serious limitations and inconsistent results with uncertainty about the directness of results.)

Not able to assess. We were unable to identify published RCTs or observational studies that met inclusion criteria for review; body of evidence was too sparse to be evaluated.

GRADE indicates Grading of Recommendations Assessment, Development and Evaluation; RCT, randomized controlled trial. <sup>a</sup>Adapted from the GRADE Working Group.<sup>9.10</sup>

United States, assuming similar risk factors for rare cancers. The assessment of correlation excluded 5 drugs: aldesleukin for metastatic melanoma, valrubicin for urinary bladder carcinoma, doxorubicin liposome for metastatic ovarian cancer, and toremifene citrate and exemestane for breast cancer. These cancers are not considered rare. The drugs are indicated for smaller subpopulations of patients with specific disease, physical, or genetic characteristics. Prevalence estimates for patients with these specific characteristics were not reported. We also explored whether the level and quality of evidence for oncology orphan drugs is associated with receipt of FDA accelerated approval.

# RESULTS

We initially identified 48 oncology orphan drugs for inclusion in this study from the Cumulative List of Designated Approved Orphan Products. Of these drugs, 3 (Idamycin, Vesanoid, and Mylotarg) have been discontinued or withdrawn from the US market, and 5 drugs (Gleevec, Sprycel, Tasigna, Velcade, and Temodar) were indicated to treat more than 1 orphan indication or patient population; each indication was independently evaluated for these drugs. We did not include expanded or supplemental approvals for nonorphan indications. In total, 47 orphan drugs and indications were included

## ■ Table 2. QHES Grading System for Cost-Effectiveness Studies<sup>11</sup>

- 1. Was the study objective presented in a clear, specific, and measurable manner?
- 2. Were the perspective of the analysis and reasons for its selection stated?
- 3. Were variable estimates used in the analysis from the best available source (ie, RCT, best; expert opinion, worst)?
- 4. If estimates came from a subgroup analysis, were the groups prespecified at the beginning of the study?
- 5. Was uncertainty handled by (1) statistical analysis to address random events; (2) sensitivity analysis to cover a range of assumptions?
- 6. Was incremental analysis performed between alternatives for resources and costs?
- 7. Was the methodology for data abstraction (including value health states and other benefits) stated?
- 8. Did the analytic horizon allow time for all relevant and important outcomes? Were benefits and costs that went beyond 1 year discounted (3%-5%) and justification given for the discount rate?
- 9. Was the measurement of costs appropriate and was the methodology for the estimation of quantities and unit costs clearly described?
- 10. Were the primary outcome measure(s) for the economic evaluation clearly stated and were the major short-term, long-term, and negative outcomes included?
- 11. Were the health outcomes measures/scales valid and reliable? If previously tested valid and reliable measures were not available, was justification given for the measures/scales used?
- 12. Were the economic model (including structure), study methods and analysis, and components of the numerator and denominator displayed in a clear, transparent manner?
- 13. Were the choice of economic model, main assumptions, and limitations of the study stated and justified?
- 14. Did the author(s) explicitly discuss direction and magnitude of potential biases?
- 15. Were the conclusions/recommendations of the study justified and based on the study results?
- 16. Was there a statement disclosing the source of funding for the study?

QHES indicates Quality of Health Economic Studies; RCT, randomized controlled trial.

in this study and are listed in **Table 3** by their brand and generic names. The majority of oncology orphan drugs are indicated for rare blood cancers (n = 30). Table 3 also describes the date of full and/or accelerated regulatory approval, and lists the number of RCTs identified in the published literature that met the inclusion criteria with citations of all published articles that were used to inform the body of evidence.

We identified a total of 60 RCTs that met our inclusion criteria. The greatest number of RCTs were conducted for interferon alpha-2a indicated for chronic myelogenous leukemia (CML) (n = 7), aldesleukin indicated for metastatic renal cell carcinoma (n = 7), and rituximab indicated for non-Hodgkin B-cell lymphoma (n = 6). The majority of trials we identified comprised the evidence base used for regulatory approval.

**Figure 2** summarizes the clinical evidence grades assigned in this study. Twelve drugs had moderate-quality evidence, including cladribine for hairy cell leukemia and arsenic trioxide for acute promyelocytic leukemia. Although we did not identify any RCTs for these drugs that met our inclusion criteria, their clinical bodies of evidence consisted of observational studies that consistently reported similar treatment effects or a dose-response association with little threat to validity. Individual GRADE ratings assigned to each drug and their clinical bodies of evidence are listed in Table 3.

Figure 3 shows that there are drugs indicated for cancers with lower prevalence that had high-quality evidence and drugs indicated for cancers with higher prevalence that had low-quality evidence or lacked a sufficient body of evidence for review. The Spearman rank correlation coefficient between disease prevalence and the level of evidence for oncology orphan drugs was 0.3 (95% confidence interval [CI], 0.0-0.5). This indicates that there may be a weak correlation between the prevalence of rare cancers and the number of RCTs conducted for drugs indicated to treat rare cancers. A total of 14 drugs in our study received accelerated approval for the orphan indication. Of these, zero had high-quality bodies of evidence and 5 had moderate-quality bodies of evidence. Although our sample size was small, these results provided some indication that the accelerated approval provision does not optimize high-quality evidence generation for oncology orphan drugs.

We identified 21 cost-effectiveness studies that met our inclusion criteria. Of those studies, 10 evaluated the use of either interferon alpha or imatinib mesylate, or compared both for CML. Table 4 summarizes the cost-effectiveness studies included in this assessment and describes comparators, study perspectives, base-case incremental cost-effectiveness ratios, and results of sensitivity analyses.

Drug (US Trade Name)	Drug (Generic Name)	Indication	Regular Approval Date	Accelerated Approval Date	No. of RCTs	GRADE
Blood Cancer						
Treanda	Bendamustine HCI	CLL	3/20/2008		1	Low <sup>13</sup>
Campath	Alemtuzumab	B-cell CLL	9/19/2007	5/7/2001	1	Low <sup>14</sup>
Oforta	Fludarabine phos- phate (oral tablets)	B-cell CLL (not responsive to or progressing during or after treatment with at least 1 standard alkylating agent–containing regimen)		12/18/2008	0	Low <sup>15</sup>
Fludara	Fludarabine phos- phate (injection)	B-cell CLL (not responsive to or progressing during treatment with at least 1 standard alkylating agent–con- taining regimen)	4/18/1991		1	Very low <sup>16</sup>
Nipent	Pentostatin	Hairy cell leukemia	10/11/1991		1	Moderate <sup>17-21</sup>
Leustatin Injection	Cladribine	Hairy cell leukemia	2/26/1993		0	Moderate <sup>17-19</sup> 22,23
Trisenox	Arsenic trioxide	APL (refractory or relapsed from reti- noid and anthracycline chemotherapy and presence of t(15:17) translocation or PML/RAR-alpha gene	9/25/2000		0	Moderate <sup>24-26</sup>
Sprycel	Dasatinib	Ph+ ALL (resistant or intolerant to prior therapy)	6/28/2006		0	Not able to assess
Gleevec	Imatinib mesylate	Ph+ ALL (relapsed or refractory)	10/19/2006		0	Low <sup>29,30</sup>
Oncaspar	PEG-asparaginase	ALL (patients hypersensitive to native forms of Lasparaginase)	2/1/1994		1	Very low <sup>31-33</sup>
Arranon	Nelarabine	T-cell ALL <i>or</i> T-cell lymphoblastic leukemia (refrac- tory or relapsed after 2 chemotherapy regimens)	10/31/2005		0	Not able to assess
Clolar	Clofarabine	Pediatric ALL (refractory or relapsed after at least 2 prior regimens)		12/28/2004	0	Very low <sup>34</sup>
Sprycel	Dasatinib	CML (resistance or intolerance to prior therapy including imatinib)	5/21/2009	6/28/2006	1	Moderate <sup>35-38</sup>
Gleevec	Imatinib mesylate	CML (chronic phase, after failure of IFN alpha therapy)	12/5/2003	5/10/2001	1	Moderate <sup>39-4</sup>
Roferon A	Interferon alpha-2a	CML	10/19/1995		7	High <sup>42-50</sup>
Tasigna	Nilotinib	Ph+ CML (chronic phase or acceler- ated phase, resistant or intolerant of imatinib)	10/29/2007		0	Not able to assess <sup>51</sup>
Tasigna	Nilotinib	Newly diagnosed Ph+ CML (chronic phase)	6/17/2010		1	Moderate <sup>52</sup>
Gleevec	Imatinib mesylate	Newly diagnosed CML		12/20/2002	0	Not able to assess <sup>52</sup>
Gleevec	Imatinib mesylate	Newly diagnosed Ph+ CML (pediatric)		9/27/2006	0	Not able to assess
Gleevec	Imatinib mesylate	Chronic eosinophilic leukemia (CEL)	10/19/2006		0	Not able to assess
Velcade	Bortezomib	Multiple myeloma	3/25/2005	5/13/2003	3	Moderate <sup>53-57</sup>
Alkeran for injection	Melphalan	Multiple myeloma	11/18/1992		0	Not able to assess
Thalomid	Thalidomide	Multiple myeloma (+ dexamethasone)		5/26/2006	2	Low <sup>58,59</sup>
Velcade	Bortezomib	Mantle cell lymphoma (patients received 1 prior therapy)	12/8/2006 (supplement)		0	Not able to assess
Vidaza	Azacitidine	MDS	5/19/2004		2	Moderate <sup>60-65</sup>
Dacogen Gleevec	Decitabine Imatinib mesylate	MDS MDS/MPD associated with PDGFR	5/2/2006 10/19/2006		1 0	Low <sup>64</sup> Not able to

## **Table 3.** Oncology Orphan Drugs and Their Assigned Clinical Evidence Grades

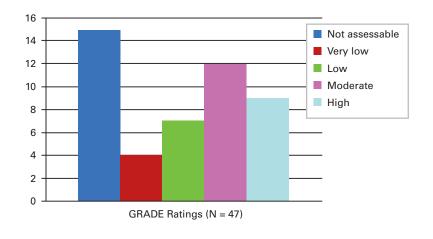
Drug (US Trade Name)	Drug (Generic Name)	Indication	Regular Approval Date	Accelerated Approval Date	No. of RCTs	GRADE	
Blood Cancer (Continued)							
Rituxan	Rituximab	Non-Hodgkin B-cell lymphoma (CD20+, low grade or follicular, relapsed or refractory)	11/26/1997		6	Moderate <sup>65-72</sup>	
Treanda	Bendamustine HCI	Non-Hodgkin B-cell lymphoma (indo- lent, progressed within 6 months of rituximab regimen)	10/31/2008		0	Not able to assess	
Zevalin	lbritumomab tiuxetan	Non-Hodgkin B-cell lymphoma (low-grade, follicular, or transformed, relapsed or refractory)	2/19/2002		1	Low <sup>72-74</sup>	
Skin Cancer							
Proleukin	Aldesleukin	Metastatic melanoma	1/9/1998		3	High <sup>75-77</sup>	
Targretin	Bexarotene (capsule)	Cutaneous T-cell lymphoma (refrac- tory to 1 prior systemic therapy)	12/29/1999		0	Not able to assess <sup>78</sup>	
Ontak	Denileukin diftitox	Cutaneous T-cell lymphoma (persis- tent, recurrent, CD25 component of IL-2 receptor)	10/15/2008	2/5/1999	1	Moderate <sup>79</sup>	
Zolinza	Vorinostat	Cutaneous T-cell lymphoma (progres- sive, persistent, recurrent disease during or following 2 systemic therapies)	10/6/2006		0	Not able to assess	
Gleevec	Imatinib mesylate	Dermatofibrosarcoma protuberans (unresectable, recurrent, and/or metastatic)	10/19/2006		0	Not able to assess	
Renal and Bladder	Cancer						
Proleukin	Aldesleukin	Metastatic renal cell carcinoma	5/5/1992		7	Moderate <sup>80-8</sup>	
Nexavar	Sorafenib tosylate	Advanced renal cell carcinoma	12/20/2005		2	High <sup>88-91</sup>	
Torisel	Temsirolimus	Advanced renal cell carcinoma	5/30/2007		1	High <sup>92</sup>	
Valstar	Valrubicin	Urinary bladder carcinoma (BCG refractory, in situ)	9/25/1998		0	Not able to assess	
<b>Ovarian and Breast</b>							
Doxil	Doxorubicin liposome	Metastatic ovarian cancer (refrac- tory to paclitaxel and platinum-based chemotherapy)	1/28/2005	6/28/1999	4	Moderate <sup>93-94</sup>	
Fareston	Toremifene citrate	Metastatic breast cancer (postmeno- pausal women with estrogen+ or receptor unknown tumors)	5/29/1997		2	High <sup>99,100</sup>	
Aromasin	Exemestane	Advanced breast cancer (postmenopausal women, disease progression after tamoxifen)	10/21/1999		5	High <sup>101-109</sup>	
Brain Cancer							
Temodar	Temozolomide	Refractory anaplastic astrocytoma	3/15/2005	8/11/1999	0	Not able to assess	
Temodar	Temozolomide	Glioblastoma multiforme (+ radiotherapy)	3/15/2005		1	High <sup>110,111</sup>	
Gastrointestinal Ca	ancer, Liver Cancer, a	nd Mesothelioma					
Gleevec	Imatinib mesylate	Gastrointestinal stromal tumors (Kit CD117+, unresectable and/or meta- static malignant)	9/29/2008	2/1/2002	0	Very low <sup>112-112</sup>	
Nexavar	Sorafenib tosylate	Hepatocellular carcinoma (unresectable)	11/16/2007		2	High115-118	
Alimta	Pemetrexed diso- dium (intravenous infusion)	Malignant pleural mesothelioma	2/4/2004		2	High <sup>119-121</sup>	

**Table 3.** Oncology Orphan Drugs and Their Assigned Clinical Evidence Grades (Continued)

ALL indicates acute lymphocytic leukemia; APL, acute promyelocytic leukemia; BCG, bacillus Calmette-Guerin; CLL, chronic lymphocytic leukemia; CML, chronic myelogenous leukemia; GRADE, Grading of Recommendations Assessment, Development and Evaluation; IFN, interferon; IL-2, interleukin 2; MDS, myelodysplastic syndrome; MPD, myeloproliferative disease; PDGFR, platelet-derived growth factor receptor; Ph+, Philadelphia chromosome; RCT, random-ized controlled trial.



### **Figure 2.** GRADE Ratings for FDA-Approved Oncology Orphan Drugs



FDA indicates US Food and Drug Administration; GRADE, Grading of Recommendations Assessment, Development and Evaluation.

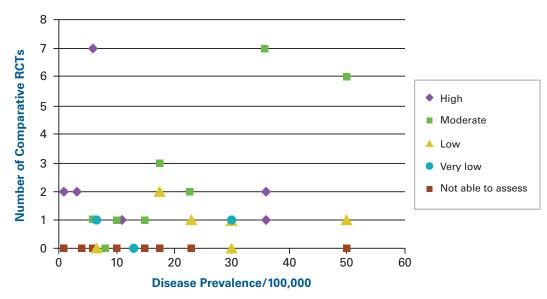
not provide explicit discussion about the direction and magnitude of potential biases; 6 studies did not specify the source of funding for the study, which is recommended to add transparency; and 5 studies either failed to specify the time horizon for analysis, conducted analysis using a short time horizon that is not expected to fully capture clinically significant costs and effects, or did not implement adequate discounting for both future costs and outcomes. Table 4 reports the quality scores assigned to each cost-effectiveness study using the best-case scoring method where full points were assigned to inapplicable criteria. Scores assigned using the worst-case approach, where zero points were assigned to inapplicable criteria, are reported in parentheses.

The cost-effectiveness analyses received QHES scores ranging from 72 to 100, with a mean score of 85. The clinical data used to inform the studies were largely obtained from either randomized trials or patient medical records. The majority of studies implemented modeling techniques to project longer-term health outcomes that could not be obtained from limited clinical data. Cost inputs were obtained from administrative databases and the published literature. The most common shortcomings were as follows: 11 studies used data inputs from sources that might potentially incorporate bias and did

# DISCUSSION

We conducted a systematic literature review to identify and assess clinical and economic evidence for 47 oncology orphan drugs marketed in the United States and applied 2 independent grading frameworks to the selected studies to critically assess the quality of each body of evidence. The supporting bodies of evidence available for marketed oncology orphan drugs vary in quality, with limited evidence demonstrating their economic value.

#### **Figure 3.** Disease Prevalence Versus Level and Quality of Evidence



RCT indicates randomized controlled trial.

Table 1 Summar	of Cost-Effectiveness Studies and QHES Evidence Grades
<b>Iable 4.</b> Summar	of Cost-Ellectiveness Studies and Ches Evidence Grades

First Author and Year	Comparators	Disease Indication	Study Perspective	Base-Case Results (Range)	QHES
Blood Cancer					
Kattan 1996 <sup>122</sup>	IFN alpha vs hydroxyurea	CML (chronic phase)	Not specified	IFN alpha: \$34,800/QALY (range not provided)	73 (65)
Liberato 1997 <sup>123</sup>	IFN alpha vs hydroxyurea	CML (chronic phase)	Social	IFN alpha for patients with hematologic response: \$89,500/QALY (\$16,000-\$198,700/QALY) IFN alpha for patients with cytogenetic	89 (81)
				remission in 2-year period: \$63,500/QALY (\$9500-\$218,400/QALY)	
Messori 1998 <sup>124</sup>	IFN alpha vs busulphan or hydroxyurea	CML (chronic phase)	Social	IFN alpha: \$93,461-\$226,545/LYG (varies based on different international clinical trial data used for analysis) (\$56,022-\$204,680/LYG)	89 (81)
Beck 2001 <sup>125</sup>	IFN alpha vs IFN alpha + cytarabine vs hydroxyurea	CML (chronic phase)	Not specified	IFN alpha vs IFN alpha + cytarabine: \$16,900/QALY (\$7000-\$35,000/QALY)	76 (68)
				IFN alpha vs hydroxyurea: \$23,700/QALY	
Gordois 2003 <sup>126</sup>	Imatinib mesylate vs conventional chemo- therapy and palliative	CML (accelerated and blast crisis phases)	UK National Health Service	Imatinib (accelerated phase): £29,344/QALY (£9132-£60,991/QALY)	92 (92)
	care			lmatinib (blast crisis phase): £42,239/QALY (£11,556-£122,016/QALY)	
Warren 2004 <sup>127</sup>	lmatinib mesylate vs hydroxyurea	CML (chronic phase)	UK National Health Service	Imatinib: £38,468/QALY (£14,195-£62,745/QALY)	92 (91)
Dalziel 2005 <sup>128</sup>	lmatinib mesylate vs IFN alpha vs hydroxyurea	CML	UK National Health Service	Imatinib vs IFN alpha: £26,180/QALY (£19,449-£51,870/QALY) Imatinib vs hydroxyurea: £86,934/QALY	100 (99)
				(£69,701-£147,095/QALY)	
Skrepnek 2005 <sup>129</sup>	Imatinib mesylate vs allogeneic bone marrow transplantation	CML	US third-party payer	Imatinib: dominant	97 (89)
Reed 2004 <sup>130</sup>	Imatinib vs IFN alpha + low dose cytarabine	CML (chronic phase)	US healthcare system	Imatinib (using AWP drug cost): \$57,103/QALY (\$51,800-\$57,500/QALY)	100 (99)
				Imatinib (using WAC drug cost): \$46,082/QALY (\$42,000-\$46,200/QALY)	
Chen 2009 <sup>131</sup>	Imatinib mesylate vs IFN alpha	CML (chronic phase)	Chinese public healthcare system	Imatinib: RMB 73,674/QALY (RMB 67,712-RMB 79,637/QALY)	83 (82)
Guest 2009 <sup>132</sup>	Pentostatin vs cladribine	Hairy cell leukemia	UK National Health Service	Pentostatin: <£5000/QALY (≤£6500/QALY)	84 (76)
Scott 2007 <sup>133</sup>	Alemtuzumab vs fludarabine + cyclophosphamide + rituximab (FCR)	CLL (third line)	New Zealand Pharmaceutical Management Agency (PHARMAC)	Alemtuzumab: NZ\$46,016/QALY (range not provided)	73 (65)
Mehta 2004 <sup>134</sup>	Bortezomib vs thalidomide vs best supportive care	Multiple myeloma (relapsed, refractory)	US third-party payer	Bortezomib vs best supportive care: \$45,356/LYG	77 (70)
				Bortezomib with previous thalidomide use vs best supportive care: \$49,797/LYG	
				Bortezomib without previous thalidomide use vs thalidomide: \$21,483/LYG (\$18,000-\$52,705/LYG)	
					(Continued)

First Author and Year	Comparators	Disease Indication	Study Perspective	Base-Case Results (Range)	QHES
Renal Cancer					
Hoyle 2010 <sup>135</sup>	Sorafenib vs best supportive care	Advanced renal cell carcinoma (second line)	UK National Health Service	Sorafenib: £75,398/QALY (£47,440-£82,821/QALY)	84 (83)
Breast Cancer					
Hillner 2001 <sup>136</sup>	Exemestane vs megestrol	Advanced breast cancer	US societal	Exemestane: \$10,600/LYG (\$6200-\$209,000/LYG)	84 (76)
Lindgren 2002 <sup>137</sup>	Exemestane vs megestrol	Advanced breast cancer	Payer perspec- tive in Austra- lia, Belgium, France, Germany, Italy, The Nether- lands, Spain, UK	Exemestane for 1080 days: Australia: €11,169/LYG (€7528-€9878/LYG) Belgium: €6911/LYG (€3822-€4552/LYG) France: €6966/LYG (€4769-€5827/LYG) Germany: €1353/LYG (€1899-€3104/LYG) Italy: €10,638/LYG (€9844-€11,147/LYG) The Netherlands: €13,016/LYG (€6571-€11,801/LYG) Spain: €7806/LYG (€7867-€8415/LYG) UK: €11,733/LYG (€10,390-€13,106/LYG)	78 (70)
Lundkvist 2007 <sup>138</sup>	Exemestane vs tamoxifen	Early-stage breast cancer (adjuvant treatment after 2-3 years treatment with tamoxifen)	Swedish health- care system	Exemestane: €31,000/QALY (€13,000-€46,000/QALY)	100 (92)
Gastrointestinal (	Cancer and Mesotheliom	а			
Huse 2007 <sup>139</sup>	Imatinib mesylate vs no imatinib (palliative or supportive care)	Gastrointestinal stro- mal tumors	US societal	Imatinib: \$38,723/QALY (\$4267-\$61,673/QALY)	77 (76)
Contreras-Her- nandez 2008 <sup>140</sup>	Imatinib vs sunitinib vs palliative care	Gastrointestinal stromal tumors (second line)	Mexican Insurance Sys- tem (Instituto Mexicano del Seguro Social)	Sunitinib vs palliative care: \$46,109/LYG Sunitinib vs imatinib: dominant (ranges not specified)	72 (64)
Mabasa 2008 <sup>141</sup>	lmatinib vs no imatinib (supportive care)	Gastrointestinal stromal tumors	British Columbia Cancer Agency	Imatinib: Can\$16,911/LYG (median) (Can\$0-Can\$50,806/LYG)	82 (74)
Cordony 2008 <sup>142</sup>	Pemetrexed + cisplatin vs cisplatin	Malignant pleural mesothelioma	UK National Health Service	Pemetrexed + cisplatin vs MVP: £21,731/QALY Pemetrexed + cisplatin vs vinorelbine + platinum: £26,437/QALY	78 (77)
Summers of OUI	<b>S scores:</b> range, 72-100 (	64.00 magain .05 (20	median 04 (77)	Pemetrexed + cisplatin vs active symptom control: £32,066/QALY (£20,475-£68,598/QALY)	

### **Table 4.** Summary of Cost-Effectiveness Studies and QHES Evidence Grades (Continued)

Summary of QHES scores: range, 72-100 (64-99); mean, 85 (80); median, 84 (77).

AWP indicates average wholesale price; CLL, chronic lymphocytic leukemia; CML, chronic myelogenous leukemia; IFN, interferon; LYG, life-year gained; MVP, mitomycin-C + vinblastine + cisplatin; QALY, quality-adjusted life-year; QHES, Quality of Health Economic Studies; UK, United Kingdom; WAC, wholesale acquisition cost.

Although the GRADE methodology is relatively explicit, reviewer judgment is required. In particular, we found that it was necessary to grade certain criteria subjectively in order to better accommodate oncology orphan drug characteristics. For example, the majority of RCTs for oncology orphan drugs had relatively small sample sizes that could lead to substantial imprecision (eg, lack of power, wide confidence intervals). We assigned lower ratings for studies that did not meet predetermined enrollment criteria or appeared underpowered to detect differences in their primary end point, but we did

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not consider a smaller sample size in itself to be a limitation. We critically assessed each study and lowered ratings when we identified instances of bias that were not explicitly addressed. We also lowered ratings when studies were poorly reported, or when bodies of evidence consisted of studies that reported inconsistent treatment effects.

The number of RCTs identified in our study is comparable to the number in a study conducted by Tsimberidou and colleagues that evaluated the long-term marketing outcome of oncology drugs approved by the FDA without a randomized trial.<sup>143</sup> In their study, 68 approved oncology drugs were identified and almost half (n = 31) were approved without an RCT. Kesselheim and colleagues recently evaluated pivotal trial characteristics of orphan and nonorphan drugs approved between 2004 and 2010 to treat cancer and concluded that pivotal trials for approved oncology orphan drugs were more likely to be smaller, nonrandomized, and unblinded, and to use surrogate end points to assess efficacy.<sup>4</sup> The study is limited in that it only evaluated pivotal trials and did not account for other available clinical information. Also, the study was restricted to recently approved oncology orphan drugs and did not review the entire pharmaceutical category. We observed the same characteristics in the clinical trials that were included in our study. We also observed that there is a lack of published postmarketing studies and information about longer-term safety and efficacy.

We hypothesized that the level of evidence available for oncology orphan drugs would have a strong correlation with disease prevalence in that larger patient populations enable better evidence generation. However, our results suggested a potentially weak correlation between the prevalence of rare cancers and the level of evidence available for drugs indicated to treat rare cancers. A weak relationship suggests that evidence development for oncology orphan drugs may not depend as much on the size of a particular patient population. Instead, evidence development in this pharmaceutical category may depend more on other factors, possibly regulatory requirements or reimbursement considerations.

The overall dearth of cost-effectiveness studies in this pharmaceutical category, and in oncology as a whole, may reflect evidence limitations or publication bias, where studies of drugs with higher costs, greater benefit-risk uncertainty, or lower effectiveness are not published. In assessing the economic challenges of orphan drugs, Drummond and colleagues stated: "In short, if standard health technology assessment (HTA) procedures were to be applied to orphan drugs, virtually none of them would be 'cost-effective'."<sup>7</sup> This conclusion was largely based on 2 factors: (1) high incremental cost per quality-adjusted life-year and (2) insufficient breadth and quality of clinical evidence for orphan drugs compared with drugs for more common diseases.<sup>7</sup> Our results demonstrated that, contrary to these prior suggestions, it is feasible for some oncology orphan drugs to be considered cost-effective in specific healthcare settings using standard methods of health technology assessment. The clinical and economic value of each orphan drug should be assessed individually, on a case-by-case basis. We observed that all of the drugs considered cost-effective in their respective studies had moderate-quality to high-quality bodies of clinical evidence. This finding suggests there may be a relationship between the level and quality of clinical evidence and the likelihood that an oncology orphan drug has published estimates of cost-effectiveness.

Evidence development is costly and challenging for all healthcare interventions, but particularly for orphan drugs, due to smaller patient populations and limited clinical knowledge of rare conditions. The trade-offs to generating more robust bodies of evidence may include delayed product accessibility, higher costs, or reduced availability of therapies. For conditions that have therapeutic alternatives, these trade-offs may be acceptable. However, for life-threatening conditions with limited therapy options, these trade-offs may not be considered acceptable. For rare diseases with only a single treatment option, one may question whether economic analysis should apply. Costeffectiveness analysis is useful in that it provides information about the value of a health intervention compared with an alternative, which may be best supportive care or no therapy. From an equity perspective, McCabe and colleagues argue that there is no sustainable reason why the cost-effectiveness of orphan drugs should be evaluated differently from other drugs.<sup>2</sup> However, healthcare systems may wish to consider additional factors when making decisions about orphan drugs, such as budget impact, disease severity, availability of alternative therapies, or societal preferences toward patients with rare diseases.

Our study highlights 3 important policy questions. First, what types of study designs, incentives, or methods can be used to encourage better evidence development for oncology orphan drugs? Second, how much evidence is necessary or considered sufficient to healthcare decision makers, and what types of evidence should be generated prior to and after marketing approval? Finally, what are the process and decision-making criteria for evaluating comparative effectiveness data for oncology orphan drugs? Emerging private and public initiatives are attempting to address these questions to some extent with evolving methods such as coverage with evidence development<sup>144,145</sup> or value of information analysis,<sup>146,147</sup> but additional innovative analytic methods and policy approaches are necessary.

We recognize several limitations to this study. The most important limitation is that the GRADE assessment framework provides information about the amount of confidence that can be associated with a body of evidence and does not relay any information about the magnitude of clinical benefit or safety of a drug. Certain oncology orphan drugs with low-grade published evidence may yield significant clinical benefits, and conversely, certain drugs with high-grade evidence may yield very little benefit. Currently, there is no established framework for quantifying the magnitude of benefits or risks from health interventions. Garrison and colleagues suggest pairing CER and benefit-risk analysis into 1 framework and describe how cost-effectiveness analysis models could be adapted to conduct quantitative benefit-risk assessments.148,149 It is important for manufacturers to engage in continuous evidence generation, even after a product is commercialized, so that the effectiveness and safety of their products can be accurately assessed. Comparative effectiveness research methods that capture and incorporate nonpublished clinician or patient experiences could also be useful to help better identify the real-world value of marketed oncology orphan drugs.

Given the large number of drugs included in this review and the numerous keywords we could have used to search for potential clinical and economic studies, this review may not have captured all relevant drugs or studies. We used broad search terms in 2 major databases and also conducted manual searches of reference citations; this methodology allowed us to screen as many studies as possible. Only 1 author (MMC) reviewed potential studies, abstracted information, critically assessed articles, and assigned quality ratings. Although attempts were made to be accurate and consistent, it is possible that unintentional errors and inconsistencies could have reduced or improved the quality rating for a body of evidence. The QHES is limited in its ability to identify poorly analyzed studies and does not have a benchmark for total scores, which limits its ability to quantitatively categorize and distinguish high-quality studies from low-quality studies.

## CONCLUSIONS

The results of our study show that oncology orphan drugs marketed in the United States have varying levels and quality of clinical evidence and a shortage of evidence demonstrating economic value. It is uncertain whether the current evidence levels for oncology orphan drugs marketed in the United States are sufficient to support decision-making practices consistent with principles of evidence-based medicine and CER. This issue remains an open policy question that requires additional evaluation.

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Address correspondence to: David L. Veenstra, PharmD, PhD, University of Washington Pharmaceutical Outcomes Research and Policy Program, Department of Pharmacy, Box 357630, Seattle, WA 98195-7630. E-mail: veenstra@u.washington.edu.

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