



CDDF MULTI-STAKEHOLDER WORKSHOP
BIOMARKERS AND PATIENTS' ACCESS TO PERSONALIZED
ONCOLOGY DRUGS IN EUROPE

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Case Study

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Prognostic (Predictive?) Breast Cancer Testing

- Not a CDx but...
- A case study in MAAA* access and reimbursement in the EU

*Multianalyte Assay with Algorithmic Analysis



Genomic Health, Paving the Way

- Oncotype Dx launched in the US in 2004 and established an EU commercial presence in 2009
- Positive guidance achieved with NICE DG10 (UK) in 2013
- Some regional reimbursement achieved throughout Europe supported by Guidelines
- Significant investment in clinical trials & commercial infrastructure with low early returns (<10% of global sales)



Barriers to Success

- Delays in TAT limited utility
 - All testing conducted in Redwood City, CA
 - Test frequently reported as taking ~4 weeks to result
- High perceived cost a barrier to entry
 - Early reluctance to compromise on price delayed adoption
 - Undisclosed discount schemes eventually implemented



Competitive Pressure

- MammaPrint (Agendia, Amsterdam)
 - Launched in 2004 but sample limited to fresh-frozen tissue, increased logistical challenges and hindered broad adoption
 - European testing conducted in centralized lab
 - Achieved FDA clearance in 2007 with limited impact on adoption
 - Perceived as lagging behind ODx in evidence generation while similarly priced
 - FFPE testing available in 2012 but limited impact due to ODx foothold

More Competition

- EndoPredict (Sividon, Cologne) launched in 2011
 - Aggressive pricing strategy drove local adoption in Germany and highly price-sensitive tender based markets (Spain)
 - Acquired by Myriad in 2016, plans to kit and seek FDA clearance, decentralize testing in EU
- Prosigna (NanoString, Seattle) launched in 2013
 - Decentralized option for local labs
 - Adoption initially hindered by up-front cost of instrument acquisition but test “naturalization” very attractive for European payors
 - Kit based model and local testing reducing TAT driving adoption throughout Europe



Where are we now?

- 2004 – 2018, still limited adoption overall despite high demand and Guideline inclusion
 - EU prognostic breast cancer testing market is still approximately 10% the size of the US
 - Only National reimbursement in 5EU is through NICE
 - DG10 due to be revised this year
 - GBA has been delaying a decision for several years pending further data
 - Regional, tender based access in France and Spain
 - Very limited access in Italy
 - Good adoption in certain regions (Nordics, Portugal)

What are the Barriers?

- Unrealistic expectations of LoE for Dx testing
 - Drug-like, multi-centre prospective studies expected with high risk of never reaching RoI for Dx companies with very limited resources
 - TAILORx reported (after ~10yrs) having some impact
 - GHI working on decentralizing Oncotype into Europe
- Lack of consistent HTA process across Europe
 - “If you’ve seen one country, you’ve seen one country”
 - Significant investment required to navigate the Payor landscape in each country
 - Reluctance to reward innovation with value-based pricing



What Does this Mean for a MAAA CDx Access?

- There are several MAAA CDx tests in development
 - (e.g. Lymph2CX/LST with lenalidomide for DLBCL in Phase III, [clinicaltrials.gov NCT02285062](https://clinicaltrials.gov/ct2/show/study/NCT02285062))
 - Access will be challenging unless EU-wide solutions are found
- But, Pharma continues to be cautious about embarking on a CDx path with MAAs
 - Sacrificing a better test for a tried and trusted approach with a single analyte
- Logistical solutions are key for centralized labs to maintain required TAT for a CDx, but this is possible!
- Value-based pricing needs to become the standard for novel CDx testing, and stand-alone diagnostics that bring value and utility to the clinic