

CADTH Review Process for Cell and Gene Therapies

1. Background

CADTH has undertaken an internal review of our processes for drugs and devices, and established a revised process for the review of cell and gene therapies that leverages the strengths of both programs. This new process will offer stakeholders the benefits of firm performance targets and well-established processes for conducting reviews and issuing recommendations for drug products, with the additional ethical and implementation considerations that are an important strength of CADTH's medical devices processes. This document provides a brief overview of the new process.

2. Eligibility for the Process

Drugs eligible for this process will include cell and gene therapies. Eligibility must be confirmed by CADTH before filing the submission by sending a completed [eligibility request form](#) to requests@cadth.ca. CADTH will review the form and provide confirmation for the sponsor, typically within 10 business days of receiving the form.

3. Pre-Submission Procedure

Pre-submission activities for the cell and gene therapy review process will be similar to those currently used in CADTH's single drug review processes. This includes the opportunity for a pre-submission meeting with CADTH and the participating drug programs anytime within 12 months of the anticipated submission filing date. In accordance with CADTH's advance notification processes, sponsors of cell and gene therapies are required to provide CADTH with a minimum of 30 business days or 120 calendar days advance notice for anticipated submissions for non-oncology and oncology products, respectively.

4. Stakeholder Engagement

4.1. Patient Engagement

Patient input provides patients' experiences and perspectives of living with a medical condition for which a drug under review is indicated, their experiences with currently available treatments, and their expectations for the drug under review. The call for patient input regarding a submission for a cell or gene therapy will be posted 20 business days in advance of the anticipated filing date (as provided in the advance notification form).

As with CADTH's existing single drug review processes, CADTH will accept patient input from individual patients and caregivers only when there is no patient advocacy group representing patients with a condition for which a drug under review is indicated.

For complete details regarding the processes for patient engagement, please consult the CADTH's procedures for non-oncology and oncology products.

4.2. Clinician Engagement

Multiple clinical experts will be incorporated into the review team and a supplemental clinical panel may be convened during the review to inform the expert committee's recommendation and/or after the review to provide implementation support to the participating drug programs. As with CADTH's current single drug review processes, CADTH and INESSS may jointly engage with clinical experts for the review of cell and gene therapies.

For complete details regarding the processes for clinician engagement, please consult CADTH's procedures for non-oncology and oncology products.

4.3. Drug Plan Engagement

The participating drug programs provide input on each cell and gene therapy being reviewed through CADTH's single drug review processes by identifying issues that may impact their ability to implement a recommendation. This input increases the relevance of the recommendations and can potentially avoid the need for a request for clarification or a request for advice later in the process by ensuring that potential implementation issues are considered during the review.

As part of the review of a cell or gene therapy, the drug plans will be asked to review and comment on the completed implementation plan template filed by the sponsor. Their feedback on the implementation plan could help provide early identification of potential access issues within the different jurisdictions, potential issues with administration or distribution mechanisms (e.g., need for specialty clinics), and/or challenges with diagnostic testing requirements.

For complete details regarding the processes for drug program engagement, consult CADTH's procedures for non-oncology and oncology products.

4.4. Industry Engagement

The sponsors will be engaged in the same manner as in CADTH's current drug review processes. This includes the following opportunities:

- a pre-submission meeting with CADTH and the participating drug programs anytime within 12 months of the anticipated submission filing date
- an opportunity to review and provide commentary on the draft review reports before the expert review committee meeting
- an optional reconsideration teleconference with CADTH staff.

5. Submission Requirements

The clinical, economic, and administrative submission requirements for the cell and gene therapy process will be the same as those currently used in CADTH's single drug review processes, with the exception of the following additional requirements:

5.1. Budget Impact Analysis

Sponsors will be required to provide the following:

- a budget impact report that provides an overall aggregate budget impact analysis (BIA) for the cell or gene therapy under review (i.e., a pan-Canadian analysis)
- a copy of the model used to produce the aggregate pan-Canadian BIA
- a reference list and copies of all supporting documentation used and/or cited in the BIA.

5.2. Implementation Plan

As these products can be associated with implementation challenges for the public health system, sponsors will be required to complete a [template](#) that describes key aspects of their plans for implementing the product in Canada. This document will be summarized, appraised, and discussed by CADTH, the public drug plans, and the pan-Canadian Pharmaceutical Alliance (pCPA) to help ensure that the expert committee's recommendations can be readily implemented. This new addition to the submission requirements and review process could help facilitate faster access for patients following the completion of CADTH's review.

6. Application and Screening Procedure

6.1. Application

Sponsors must have completed the [CADTH Collaborative Workspaces Registration](#) before filing a submission or resubmission for a cell or gene therapy. The application filing and screening procedures for cell and gene therapies will be identical to those currently used in the CADTH's single drug review processes.

6.2. Application Fees

All submissions filed by manufacturers for cell and gene therapies will be subject to an application fee according to the fee schedule that is applied to CADTH's single drug review processes. A schedule E fee will be applied to submissions for cell and gene therapies (for complete details please consult [Fee Schedule for CADTH Pharmaceutical Reviews](#)).

7. Review Procedure

7.1. Clinical Review

The clinical review processes will be completed in accordance with CADTH's standard review procedures for the single drug review processes.

7.2. Economic Review

The economic review process will be completed in accordance with CADTH's standard review procedures for the single drug review processes; however, there will be additional consideration given to a pan-Canadian BIA.

7.3. Implementation Plan Review

Sponsors will be required to complete a template with key details about their plans to implement the drug in the Canadian system. This approach will allow CADTH and participating jurisdictions to reflect on potential implementation issues and corresponding mitigation strategies in an efficient manner.

7.4. Ethics Review

CADTH will identify and describe relevant ethical issues based on published and grey literature. The summary of ethical issues will be incorporated into the draft review reports and the sponsor will have an opportunity to review and provide relevant commentary. The ethics review will provide the expert review committee with an overview of ethical considerations to inform their deliberations.

8. Recommendation Procedure

The output from the process will be a recommendation from one of CADTH's drug expert review committees, in accordance with the deliberative process and recommendation framework used for the single drug review processes.

9. Transparency

In accordance with CADTH's processes, the status and key dates for the review of cell and gene therapies will be posted on the [CADTH website](#). CADTH will post the clinical and economic report(s) for all cell and gene therapies reviewed through the new process. The sponsor will be responsible for identifying any confidential information included in the reports.