

**CADTH**

**pCODR**

PAN-CANADIAN  
ONCOLOGY DRUG REVIEW

**pan-Canadian Oncology Drug Review  
Registered Clinician Feedback on a  
pCODR Expert Review Committee Initial  
Recommendation**

**Fulvestrant (Faslodex) for Metastatic  
Breast Cancer**

February 1, 2018

### 3 Feedback on pERC Initial Recommendation

Name of the drug indication(s): Fulvestrant for hormonal treatment of non-visceral locally advanced or metastatic HER2- breast cancer in postmenopausal women, regardless of age, who have not been previously treated with endocrine therapy

Name of registered clinician(s): Dr. Orit Freedman, Dr. Shailendra Verma, Dr. Andrea Eisen

*\*pCODR may contact this person if comments require clarification. Contact information will not be included in any public posting of this document by pCODR.*

#### 3.1 Comments on the Initial Recommendation

a) Please indicate if the registered clinician(s) agrees or disagrees with the initial recommendation:

agrees                       agrees in part                       disagree

*Please explain why the registered clinician(s) agrees, agrees in part or disagrees with the initial recommendation.*

The CCO Breast DAC does not consider the current fulvestrant submission to be a top priority for breast cancer patients given the new era of CD4-6 inhibitors as first line therapy.

Given the magnitude of benefit in the CD4-6 trials vs. that observed in FALCON, the Breast DAC considers the use of a CD4-6 inhibitor + aromatase inhibitor (AI) to be the standard of care for first line treatment of these patients (including those with bone only disease). The Breast DAC also acknowledged that there appears to be economic uncertainty with respects to the submitted indication, as reflected by the large ICER range (\$33,476/QALY to \$185,631/QALY). Aside from those women who are not compliant or who have difficulties

with AIs/CD4-6 inhibitors, fulvestrant’s place in therapy in the first-line setting appears to be irrelevant. If fulvestrant is funded in this population, the Breast DAC anticipates minimal uptake.

The CCO Breast DAC would support the use of fulvestrant in patients who do not tolerate or are not candidates for a CD4-6 inhibitor in the first line setting (i.e. have an issue with compliance or high liver function tests). The CCO Breast DAC would also support the use of fulvestrant in the 2<sup>nd</sup> line+ setting for patients who have acquired primary resistance to or progressed on first line therapy, although we recognize this is outside the scope of this review.

b) Notwithstanding the feedback provided in part a) above, please indicate if the registered clinician(s) would support this initial recommendation proceeding to final pERC recommendation (“early conversion”), which would occur two (2) Business Days after the end of the feedback deadline date.

- |   |   |       |  |
|---|---|-------|--|
| x | Support conversion to final recommendation.<br><br>Recommendation does not require reconsideration by pERC. | _____ | Do not support conversion to final recommendation.<br><br>Recommendation should be reconsidered by pERC. |
|---|---|-------|--|

c) Please provide feedback on the initial recommendation. Is the initial recommendation or are the components of the recommendation (e.g., clinical and economic evidence) clearly worded? Is the intent clear? Are the reasons clear?

Page Number	Section Title	Paragraph, Line Number	Comments and Suggested Changes to Improve Clarity

### 3.2 Comments Related to the Registered Clinician(s) Input

Please provide feedback on any issues not adequately addressed in the initial recommendation based on registered clinician(s) input provided at the outset of the review on outcomes or issues important that were identified in the submitted clinician input. Please note that new evidence will be not considered during this part of the review process, however, it may be eligible for a Resubmission. If you are unclear as to whether the information you are providing is eligible for a Resubmission, please contact the pCODR program.

Examples of issues to consider include: Are there therapy gaps? Does the drug under review have any disadvantages? Stakeholders may also consider other factors not listed here.

Page Number	Section Title	Paragraph, Line Number	Comments related to initial registered clinician input


### 3.3 Additional comments about the initial recommendation document

Please provide any additional comments:

Page Number	Section Title	Paragraph, Line Number	Additional Comments

## 1 About Completing This Template

pCODR invites those registered clinicians that provided input on the drug under review prior to deliberation by the pCODR Expert Review Committee (pERC), to also provide feedback and comments on the initial recommendation made by pERC. (See [www.cadth.ca/pcodr](http://www.cadth.ca/pcodr) for information regarding review status and feedback deadlines.)

As part of the pCODR review process, the pCODR Expert Review Committee makes an initial recommendation based on its review of the clinical, economic and patient evidence for a drug. (See [www.cadth.ca/pcodr](http://www.cadth.ca/pcodr) for a description of the pCODR process.) The initial recommendation is then posted for feedback and comments from various stakeholders. The pCODR Expert Review Committee welcomes comments and feedback that will help the members understand why the registered clinician(s) agree or disagree with the initial recommendation. In addition, the members of pERC would like to know if there is any lack of clarity in the document and if so, what could be done to improve the clarity of the information in the initial recommendation. Other comments are welcome as well.

All stakeholders have **10 (ten) business days** within which to provide their feedback on the initial recommendation and rationale. If all invited stakeholders, including registered clinician(s), agree with the recommended clinical population described in the initial recommendation, it will proceed to a final pERC recommendation two (2) Business Days after the end of the feedback deadline date. This is called an “early conversion” of an initial recommendation to a final recommendation.

If any one of the invited stakeholders does not support the initial recommendation proceeding to final pERC recommendation, pERC will review all feedback and comments received at the next possible pERC meeting. Based on the feedback received, pERC will consider revising the recommendation document as appropriate. It should be noted that the initial recommendation and rationale for it may or may not change following consultation with stakeholders.

The final pERC recommendation will be made available to the participating provincial and territorial ministries of health and cancer agencies for their use in guiding their funding decisions and will also be made publicly available once it has been finalized.

## 2 Instructions for Providing Feedback

- a) Only registered clinician(s) that provided input at the beginning of the review of the drug can provide feedback on the initial recommendation. If more than one submission is made by the same registered clinician(s), only the first submission will be considered.
- b) Feedback or comments must be based on the evidence that was considered by pERC in making the initial recommendation. No new evidence will be considered during this part of the review process; however, it may be eligible for a Resubmission.
- c) The template for providing *pCODR Clinician Feedback on a pERC Initial Recommendation* can be downloaded from the pCODR website. (See [www.cadth.ca/pcodr](http://www.cadth.ca/pcodr) for a description of the pCODR process and supporting materials and templates.)
- d) At this time, the template must be completed in English. Registered clinician(s) should complete those sections of the template where they have substantive comments and should not feel obligated to complete every section, if that section does not apply. Similarly, the

registered clinician(s) should not feel restricted by the space allotted on the form and can expand the tables in the template as required.

- e) Feedback on the initial pERC recommendations should not exceed three (3) pages in length, using a minimum 11 point font on 8 ½" by 11" paper. If comments submitted exceed three pages, only the first three pages of feedback will be forwarded to the pERC.
- f) Feedback should be presented clearly and succinctly in point form, whenever possible. The issue(s) should be clearly stated and specific reference must be made to the section of the recommendation document under discussion (i.e., page number, section title, and paragraph). Comments should be restricted to the content of the initial recommendation.
- g) References to support comments may be provided separately; however, these cannot be new references. New evidence is not considered during this part of the review process, however, it may be eligible for a Resubmission. If you are unclear as to whether the information you are considering to provide is eligible for a Resubmission, please contact the pCODR Secretariat.
- h) The comments must be submitted via a Microsoft Word (not PDF) document by logging into [www.cadth.ca/pcodr](http://www.cadth.ca/pcodr) and selecting "Submit Feedback" by the posted deadline date.
- i) If you have any questions about the feedback process, please e-mail [submissions@pcodr.ca](mailto:submissions@pcodr.ca). Information about pCODR may be found at [www.cadth.ca/pcodr](http://www.cadth.ca/pcodr).

*Note: Submitted feedback may be used in documents available to the public. The confidentiality of any submitted information cannot be protected.*