
Impact of Cross-over in the Evaluation of Overall Survival in cancer RCTs

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Hypothetical vs. treatment policy estimand?

Concern with estimand or
(assumptions for) estimation methods(s)?

PFS vs. OS?

Treatment policy:

- 1) Subsequent therapy SOC or not?
- 2) Define "policy"!

We (statisticians!) are not precise enough!

Clear formulation of causal question.

Wrong use of sensitivity vs. supplementary.

**Wrong use of *non-informative* vs.
non-independent censoring.**

FDA interaction Glofitamab

Relapsed / refractory mantle cell lymphoma.

Phase 3 randomized: Single-agent Glofitamab vs. investigator's choice.

Endpoints:

- Primary: **PFS**.
- Secondary: **OS** (type I error protected within hierarchy).

OS: Intercurrent event **crossover from control to experimental**.

Trial not feasible in US without crossover (availability of CAR-T therapy at 2L+).

FDA interaction Glofitamab

Pre-phase III meeting:

- FDA requested **not to allow crossover**. **Why? Ethical at all? Patients go on to other therapies anyway (CAR-T!).**
- In response to sponsor's comments FDA suggested to limit crossover.

Sponsor proposed:

- Hypothetical strategy for ICE of crossover.
- Estimation via rank-preserving structural failure time (RPSFM) model.

FDA did not agree:

- RPSFM recognized method. **"Common treatment assumption"**: relative effect independent of (1) when crossover happens, (2) characteristic of patient (3) type of subsequent therapy.
- *We still recommend the log-rank test as the primary analysis.* Note: just taking OS data as it is.
- *We suggest using RPSFM as your sensitivity analysis.*
- Recommends to put a **cap** on number of patients who crossover.

Questions:

What is primary interest? Putting cap on number of X-overs insinuates interest in **hypothetical strategy**.

RPSFM makes strong assumptions for **estimation**. Independent of estimand - do we need other estimation methods?

RPSFM: estimates hypothetical estimand
⇒ supplementary for treatment policy,
NOT sensitivity.

Glofitamab not approved in 2L+ in MCL.

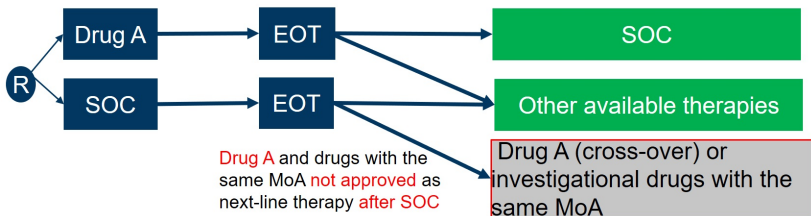
Actual (causal) comparison:

**Arm 1: Glofitamab → NALT vs.
Arm 2: SOC → Glofitamab → NALT.**

PFS vs. OS in FDA interaction for Glofit

	PFS	OS
Intercurrent event	non-protocol anti-cancer therapy prior to PD	crossover from control to experimental
FDA preferred strategy	hypothetical	treatment policy
FDA preferred estimation method	simple censoring	OS as observed, with cap on crossover.
Assumptions for estimation to give unbiased estimates for targeted estimand	independent censoring	Cap: <ul style="list-style-type: none">- Purpose?- Limit bias for estimation of treatment policy estimand?- Patients go on to other therapies anyway?

**Subsequent therapy
does not reflect SOC.**



Subsequent therapy after EOT **does not** reflect clinical practice:

- Immuno-oncology.
- Open-label trials: Patients **may leave trial** immediately after being randomized to SOC.
- Treatment policy: Clear what it is? Estimand relevant?
- Benefit on OS in a world without cross-over more informative? **Hypothetical estimand?**

Randomized but not treated

- **Blinding** often infeasible.
- Checkmate-37:
 - **20% vs 1.5%**.
 - *Weber et al. (2015)*.
- Quantum-R:
 - **23% vs 1.6%**.
 - *Cortes et al. (2019)*.

Overall survival in all randomized patients **interpretable?**

Treatment policy:

Available therapies need to
reflect clinical practice.

Need to define *policy of interest*, not just
take what we get.

Feasibility?

*If you want a causal answer you
should start with a causal question.*

Vanessa Didelez.

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Oncology estimand WG:
www.oncoestimand.org

Manitz et al. (2022)

Thank you for your attention.

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Slides can be downloaded on

www.kasparrufibach.ch

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