



eunethta

EUROPEAN NETWORK FOR HEALTH TECHNOLOGY ASSESSMENT

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**SECOND DRAFT Reflection Paper**

**Personalised medicine and co-dependent technologies, with a special focus on issues of study design**

**Version of December 2015**

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The primary objective of this EUnetHTA JA2 WP 7 methodological reflection paper is to focus on methodological challenges encountered by HTA assessors while performing relative effectiveness assessments (REA) of (co-dependent) health technologies in the emerging field of personalised medicine (PM).

The reflection paper aims to contribute to the ongoing discussion, both within EUnetHTA and with external stakeholders, about appropriate methods for the evaluation of PM technologies and lays the initial groundwork for the development of a comprehensive guideline with detailed recommendations for HTA and REA in this field.

As such, this reflection paper presents non-binding views and statements of EUnetHTA network members on the topic of PM.

In no way does it represent the official opinion of the participating institutions or individuals.

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31 This methodological reflection paper on “Personalised medicine and co-dependent  
32 technologies, with a special focus on issues of study design” has been developed by  
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34

35 With assistance from draft group members from  
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38 The reflection paper was reviewed by a group of dedicated reviewers from  
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51 **Table of contents**

52

53

54 Acronyms – Abbreviations ..... 4

55 Summary ..... 5

56 1. Introduction..... 7

57 1.1. Problem statement ..... 7

58 1.2. Objective(s) and scope of the reflection paper ..... 8

59 2. Study designs for the evaluation of biomarkers ..... 10

60 2.1. Randomise-all design ..... 10

61 2.2. Enrichment design..... 14

62 2.3. Single-arm design ..... 15

63 2.4. Biomarker-strategy design..... 16

64 2.5. Hybrid design ..... 17

65 2.6. Handling the situation of insufficient (direct) evidence for the benefit

66 assessment of co-dependent technologies ..... 19

67 3. Discussion ..... 21

68 Annexe 1. Definitions of key terms and concepts ..... 25

69 Annexe 2. Bibliography ..... 27

70

## 71 **Acronyms – Abbreviations**

72	AETSA	Andalusian HTA Agency
73	AIFA	Italian Medicines Agency
74	C	Control
75	CF TDN	Cystic Fibrosis Therapeutics Development Network
76	DNA	Deoxyribonucleic acid
77	ECFS-CTN	European Cystic Fibrosis Society-Clinical Trials Network
78	EGAPP	Evaluation of genomic applications in practice and prevention
79	EGFR	Epidermal growth factor receptor
80	EU	European Union
81	HAS	French National Authority for Health
82	HER2	Human epidermal growth factor receptor type 2
83	HTA	Health technology assessment
84	HTAAP	Health Technology Assessment Access Point
85	IMI	Innovative Medicines Initiative
86	IQWiG	Institute for Quality and Efficiency in Health Care
87	LEA	Linked evidence approach
88	MSAC	Australian Medical Services Advisory Committee
89	NICE	National Institute for Health and Care Excellence
90	NSCLC	Non-small-cell lung cancer
91	OSTEBA	Basque Agency for HTA, Department of Health
92	PFS	Progression-free survival
93	PM	Personalised medicine
94	RCT	Randomised controlled trial
95	REA	Relative effectiveness assessment
96	T	Treatment
97	UK	United Kingdom
98	USA	United States of America

## 99 Summary

100 The relevance of personalised medicine (PM) for patient care and the health care system  
101 in general is a subject of intense discussion, often accompanied by great expectations and  
102 promises concerning the patient-relevant benefit of PM technologies. A sharp increase in  
103 the dissemination of PM into the health care system is therefore to be expected. The  
104 reflection paper aims to contribute to the ongoing discussion, both within EUnetHTA and  
105 with external stakeholders, about appropriate methods for the evaluation of PM  
106 technologies. It also aims to support the development of a future methodological  
107 EUnetHTA guideline on PM containing detailed recommendations on various aspects from  
108 the health technology assessment (HTA) perspective. The working definition of PM for this  
109 reflection paper is taken from a recent systematic review conducted to understand how the  
110 term “PM” is actually used in scientific practice: “PM seeks to improve stratification and  
111 timing of health care by utilizing biological information and biomarkers on the level of  
112 molecular disease pathways, genetics, proteomics as well as metabolomics” [1]. This  
113 definition clarifies two aspects: (i) PM refers to groups of patients (i.e. does not actually  
114 lead to truly individualised interventions), and (ii) these groups are defined by biological  
115 information and biomarkers. The authors of this reflection paper postulate that in general,  
116 the existing HTA methods are appropriate tools for the assessment of PM technologies  
117 and that no specific new methods need to be developed. However, existing methods may  
118 need to be adapted. The reflection paper discusses the impact of four main study designs  
119 on the benefit assessment of PM technologies: (i) randomise-all, (ii) enrichment, (iii)  
120 single-arm, and (iv) biomarker-strategy design. These designs were identified in a recent  
121 systematic review. Several modifications are available and can also be combined with  
122 each other (hybrid designs). Whether the use of a specific design is appropriate depends  
123 on what question is asked and whether the assumptions made to interpret the results are  
124 acceptable. In the assessment of PM, as in most medical technologies, randomised  
125 controlled trials (RCTs) represent the highest level of evidence. However, such studies are  
126 rarely conducted within the context of PM, except for the enrichment design, which has  
127 some limitations. Due to this lack of direct high-quality evidence, some HTA bodies adopt  
128 a so-called “linked evidence approach” in the evaluation of co-dependent PM technologies.  
129 Other HTA bodies regard this approach as an “interim solution” associated with various  
130 methodological weaknesses. To infer from the current paucity of RCT-based evidence that  
131 lower-quality study designs should be used to assess PM technologies increases the risk

132 of biased conclusions in HTA. On a system level this may reduce the incentive to conduct  
133 more studies with higher-level evidence.

## 134 1. Introduction

### 135 1.1. Problem statement

136

137 The relevance of personalised medicine (PM) for patient care and the health care system  
138 in general is a subject of intense discussion, often accompanied by great expectations and  
139 promises concerning the patient-relevant benefit of PM technologies [2-5]. A sharp  
140 increase in the dissemination of PM into the health care system is to be expected: An  
141 analysis from 2012 of the clinical pipelines of 21 leading pharmaceutical and biotechnology  
142 companies showed that between 12% and 50% were PM technologies [6]. In addition,  
143 substantial resources are being invested in PM. For instance, in the USA, President  
144 Obama has allocated \$215 million of the 2016 budget to a major research programme,  
145 the “Precision Medicine Initiative”, focussing on the development of more and better  
146 treatments for cancer [7,8]. Furthermore, between 2007 and 2012 an estimated €1 billion  
147 was invested in the promotion of PM technologies within the context of the Seventh EU  
148 Framework Programme for Research and Technological Development (FP7) [9].

149 This raises questions about the challenges involved for HTA bodies regarding the  
150 assessment and reimbursement of PM technologies. For instance, diverging opinions exist  
151 on whether or not new HTA methods are needed in this regard (e.g. [10-17]). These issues  
152 need to be discussed within the HTA community.

153 Various definitions of individualised or personalised medicine are available [18]. A broad  
154 one is provided by the European Alliance for Personalised Medicine: “A targeted approach  
155 to the prevention, diagnosis and treatment of disease based on an individual’s specific  
156 profile” [19]. A German working group conducted a systematic review to understand how  
157 the term “PM” was actually used in scientific practice. On the basis of the definitions  
158 identified, they derived the following “precising definition”: “PM seeks to improve  
159 stratification and timing of health care by utilizing biological information and biomarkers on  
160 the level of molecular disease pathways, genetics, proteomics as well as metabolomics”  
161 [1]. This definition clarifies two aspects: PM refers to groups of patients (i.e. does not  
162 actually lead to truly individualised interventions), and these groups are defined by  
163 “biological information and biomarkers”. The diagnostic test (e.g. imaging or laboratory  
164 biomarker) used to identify a specific patient group and the subsequent therapeutic  
165 intervention are co-dependent technologies, that is, “their use needs to be combined  
166 (either sequentially or simultaneously) to achieve or enhance the intended clinical effect of

167 either technology” [20]. The diagnostic test is also referred to as a “companion diagnostic”  
168 [21,22].

169 The above definition of PM by the German working group [1] leads to the term “stratified”  
170 (or “precision”) medicine [23]. The two terms “ PM” and “precision medicine” are often  
171 used interchangeably (also in scientific literature) [24]. “However, there was concern that  
172 the word `personalised` could be misinterpreted to imply that treatments and preventive  
173 measures are being developed uniquely for each individual; in precision medicine, the  
174 focus is on identifying which approaches will be effective for which patients based on  
175 genetic, environmental, and lifestyle factors” [25]. PM and precision medicine essentially  
176 have the same goal, namely, “finding the best possible medicine and therapy for each and  
177 every individual patient” [26]. Precision medicine can therefore be considered an  
178 expansion of the PM concept and some researchers argue that the most recent term,  
179 “precision medicine”, should be preferred to the term “PM” [27].

180 Another term often used in connection with PM is targeted therapy, a concept mostly used  
181 in cancer treatment, which “relies on the existence of a defined molecular target...and/or  
182 on the existence of a biomarker able to identify the target population...” [28].

183 PM “does not literally mean the creation of drugs or medical devices that are unique to a  
184 patient” [29], such as prosthetics designed for individual patients or the individualised  
185 processing of human cells and tissues (e.g. autologous stem cell transplants or patient-  
186 specific cancer vaccines) [29]. This does not imply that such interventions do not require  
187 evidence-based assessment; however, they do not form part of the common  
188 understanding of PM as outlined in the definition above [1]. Furthermore, this definition  
189 does not cover the individualised selection of treatments by means of n-of-1 trials.

190

## 191 **1.2. Objective(s) and scope of the reflection paper**

192

193 The reflection paper aims to contribute to the ongoing discussion, both within EUnetHTA  
194 and with external stakeholders, about appropriate methods for the evaluation of PM  
195 technologies. It also aims to support the development of a future methodological  
196 EUnetHTA guideline on PM containing detailed recommendations on various aspects from  
197 the HTA perspective. The paper discusses the impact of four main study designs on the

198 benefit assessment of PM technologies. Its focus is thus rather narrow. The cost-  
199 effectiveness assessment of PM, as well as legal, ethical, and societal implications, are  
200 beyond the scope of the reflection paper. However, these aspects are discussed  
201 elsewhere, for example, by Gutiérrez-Ibarluzea on the basis of the EUnetHTA core model  
202 [30].

## 203 **2. Study designs for the evaluation of biomarkers**

### 204

205 This reflection paper discusses the four main categories of study designs aiming to assess  
206 the patient-relevant benefit of PM technologies: (i) randomise-all, (ii) enrichment, (iii)  
207 single-arm, and (iv) biomarker-strategy design. They were selected on the basis of a  
208 systematic review that aimed to identify study designs used in the evaluation of prognostic  
209 and predictive biomarkers and to develop a classification scheme [31]. To the best of our  
210 knowledge, this review is so far the only one of its kind. Several modifications of these  
211 study designs are available and can also be combined with each other (hybrid designs).

212 Enrichment, randomise-all, and biomarker-strategy designs are studies where different  
213 interventions or strategies are compared in parallel in groups of patients. Basically, the  
214 allocation of patients to groups does not necessarily have to be conducted in a  
215 randomised manner. However, randomisation is the only known form of allocation that  
216 generally results in equality of structure, and thus in the comparability, of study groups.  
217 Conversely, this means that for non-randomised studies a far greater effort is required to  
218 ensure sufficient similarity of structure. In addition, as greater variance can be expected,  
219 larger sample sizes are usually required for non-randomised studies than for randomised  
220 ones.

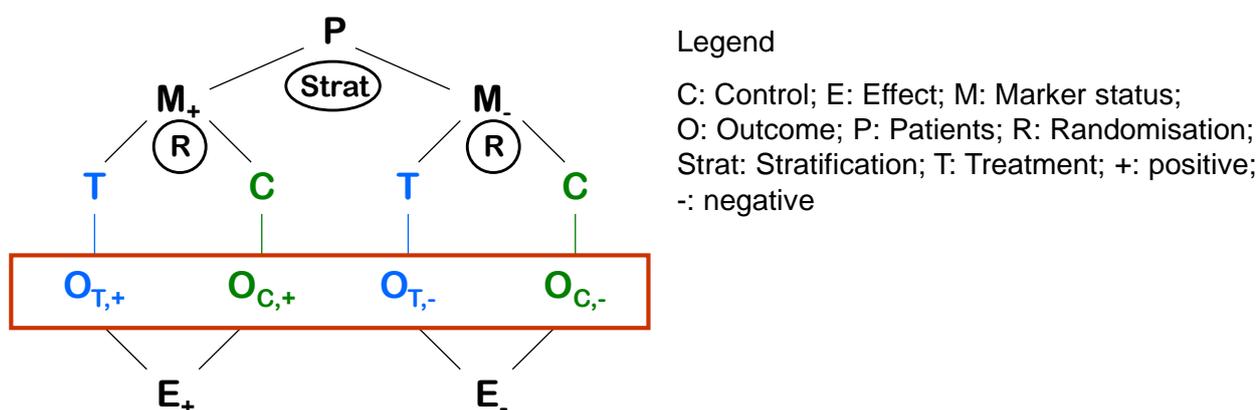
### 221 **2.1. Randomise-all design**

### 222

223 On the basis of the idea that the use of a biomarker can better select the patients for a  
224 certain treatment and hence improve patient-relevant outcomes, the interaction between  
225 diagnostic information provided by biomarkers and treatment effects needs to be  
226 evaluated. This requires a comparison of treatments within the different biomarker strata.  
227 Ideally this should be conducted by means of an RCT in which the biomarker test result  
228 remains blinded. As all patients are randomised to the different treatment options  
229 independently of their biomarker status, this type of design is referred to as a “randomise-  
230 all” design (see figure 1). Alternative terms are described in Tajik et al. [31].

231

232



233

234 Figure 1: Randomise-all design

235

236 The following text describes the “simple” situation of a binary biomarker status (positive or  
 237 negative) and two treatment options ([experimental] treatment [T] or control [C]). However,  
 238 the basic principles can also be applied to more complex situations.

239 In the case of a qualitative interaction there is a reversal of effects, for instance, an  
 240 advantage of T over C in biomarker-positive patients, but an advantage of C over T in  
 241 biomarker-negative ones. A reversal of effects has rarely been shown in RCTs,  
 242 presumably because, if such effects were assumed, a study comparing treatment  
 243 alternatives in one of the two strata would not be regarded as appropriate, resource-  
 244 efficient, or ethically justifiable in the first place. An example of such a reversal of effects is  
 245 a study comparing first-line gefitinib therapy with standard chemotherapy (carboplatin plus  
 246 paclitaxel) in patients with epidermal growth factor receptor (EGFR)-mutation-positive or  
 247 negative advanced non-small-cell lung cancer (NSCLC) [32]. It is notable that the study  
 248 was not primarily designed to detect an interaction between marker status and treatment  
 249 effect, but to show the non-inferiority of gefitinib in the overall study population. Non-  
 250 inferiority was shown; however, the survival curves of the two treatment groups crossed,  
 251 which was ascribed to the interaction between marker status and treatment effect. In  
 252 Europe, gefitinib was subsequently approved for patients with EGFR-positive NSCLC [33].  
 253 An interaction can also be described as qualitative if an advantage of T is shown over C in  
 254 marker-positive patients, but no difference is shown in the marker-negative group. A well-  
 255 known example is the benefit of antihormonal therapy (e.g. with tamoxifen) in patients with  
 256 breast cancer depending on hormone-receptor status [34].

257 If treatment effects in the biomarker strata are in the same direction and only show  
 258 quantitative differences, this represents a quantitative interaction. This situation is common  
 259 and at the same time particularly problematical for the question of the benefit of a

260 biomarker-based choice of treatment. If the “personalised” treatment under investigation is  
261 only offered to patients in the subgroup where the greater treatment effect was shown,  
262 then a potentially beneficial treatment may be withheld from the remaining patients. This  
263 can only be justified if other reasons (e.g. adverse effects, costs) outweigh the (positive but  
264 smaller) treatment effects in the remaining patients. A further point should be noted: If a  
265 treatment effect is shown and the biomarker under investigation is of prognostic relevance  
266 for the outcome of interest, then at least a quantitative interaction always exists. This  
267 interaction is either on an absolute scale with a relatively constant treatment effect or on a  
268 relative scale with an absolutely constant treatment effect (see table 1). If a biomarker is to  
269 be used as a basis for the choice of treatment, a more than irrelevant quantitative  
270 interaction must exist. The demonstration of such an interaction requires a general  
271 consensus about the statistical methods to be applied.

272

273

274 Table 1: Quantitative interaction in dependence on the effect scale

Failure rate	Marker positive	Marker negative	Interpretation
Effect: relative risk reduction	50%	50%	No interaction
Effect: absolute risk reduction	15%	30%	Quantitative interaction
Effect: relative risk reduction	50%	33%	Quantitative interaction
Effect: absolute risk reduction	15%	15%	No interaction

275 = Treatment = Control

275

276

277

278 The advantage of a randomise-all design is that only this type of design is suitable to  
 279 assess the individual components of a test-treatment strategy and their interaction. The  
 280 following questions can be answered: “Is the treatment effective?” and “Is the biomarker  
 281 sufficiently predictive?” The disadvantage is that the direct (physical or psychological)  
 282 effects of the test (see Bossuyt and McCaffery [35]) on the patients cannot be assessed,  
 283 as all patients are tested.

284 In principle, a randomise-all design can be applied retrospectively if the biomarker  
 285 information is still available after completion of the treatment study [36]. However, two

286 main problems arise here: Firstly, a multiple testing problem is created that basically  
 287 cannot be solved, but only restricted by the post-hoc formulation of a study objective in an  
 288 amendment to the original study protocol (e.g. including a definition of thresholds). This  
 289 type of study thus has a prospective-retrospective design [37]. Secondly, it must be  
 290 ensured that the diagnostic tests used in the original study to determine the biomarkers  
 291 and the subsequent treatments still represent current standards. It can be assumed that in  
 292 view of the abundance of “omic” information, prospective-retrospective studies will play an  
 293 increasing role in clinical research. To conduct these studies, data and samples from  
 294 clinical studies not directly related to the original study objective will need to be made  
 295 available and networks formed.

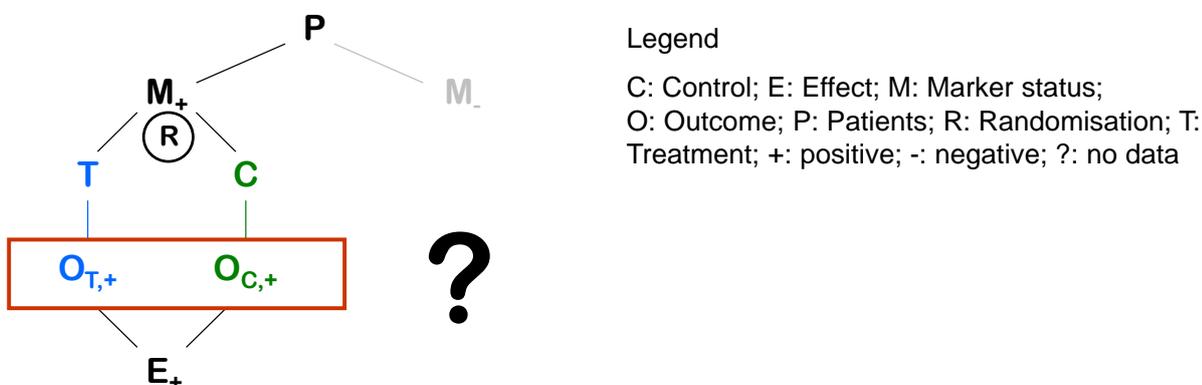
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297 **2.2. Enrichment design**

298

299 In an enrichment design, only marker-positive (or sometimes only marker-negative)  
 300 patients are included in a controlled treatment study, that is, the study inclusion criteria are  
 301 extended by the marker status (see figure 2). Ultimately every clinical study with inclusion  
 302 and exclusion criteria is thus a study with an enrichment design.

303



304

305 Figure 2: Enrichment design

306

307 Compared with the randomise-all design, the information is missing on the effectiveness of  
 308 treatment in patients with the excluded marker status. Instead, conclusions on the  
 309 (unfavourable, insufficient or lacking) treatment effects in the excluded group are drawn on  
 310 the basis of assumptions. However, as shown by the example of the impact of the human  
 311 epidermal growth factor receptor type 2 (HER2) status in women with breast cancer, even  
 312 highly plausible assumptions may be inaccurate or wrong. On the basis of

313 pathophysiological mechanisms, only patients with HER2-positive tumours were supposed  
 314 to be treated in two pivotal studies of the monoclonal antibody trastuzumab, with beneficial  
 315 effects on disease-free and overall survival [38]. About 10% of patients were subsequently  
 316 reclassified as HER2-negative; however, the drug also appeared to show a benefit in  
 317 these patients [39]. A benefit of trastuzumab was also shown in patients with HER2-  
 318 negative primary tumours, but with circulating tumour cells expressing HER2 [40]. The US  
 319 National Cancer Institute is currently conducting a study on trastuzumab therapy in  
 320 patients with HER2-low breast cancer [41].

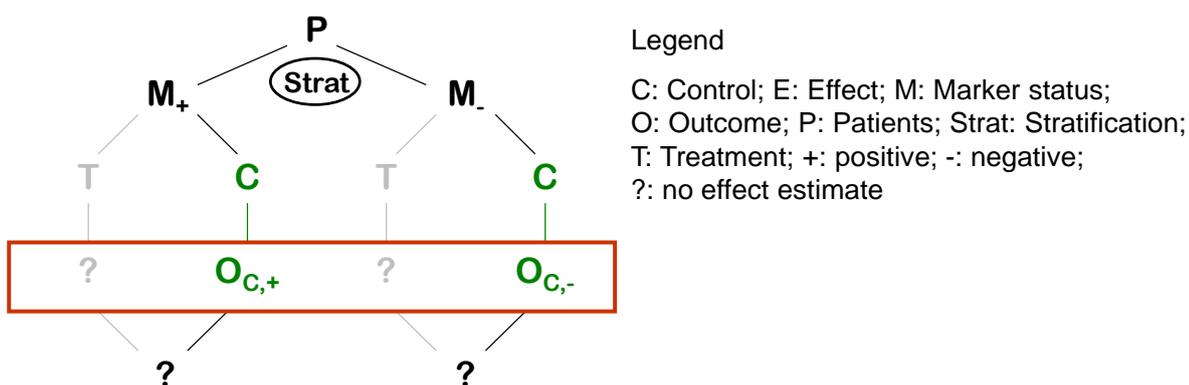
321 One advantage of a study with an enrichment design is that it requires a smaller sample  
 322 size than other types of studies.

323 **2.3. Single-arm design**

324

325 A study is designated as single arm if only the prognostic value of a biomarker with regard  
 326 to the occurrence of an unfavourable patient-relevant event is evaluated. In this type of  
 327 study, different biomarker strata, not different treatment options, are compared (see figure  
 328 3). Such studies are typically conducted in patients receiving standard treatment. If no  
 329 treatment is available, the study explores the “natural course” of the disease; however, this  
 330 type of exploration is extremely rare nowadays, as some kind of treatment is usually  
 331 offered, which may modify the course of disease.

332



333

334 Figure 3: Single-arm design

335

336 In single-arm studies, similarly to studies with an enrichment design, half of the information  
 337 required to answer the (decisive) question on interaction is missing, namely, on the  
 338 prognosis in patients receiving experimental treatment and thus on the effectiveness of  
 339 this treatment [42]. Therefore this type of study is basically not suitable to demonstrate the

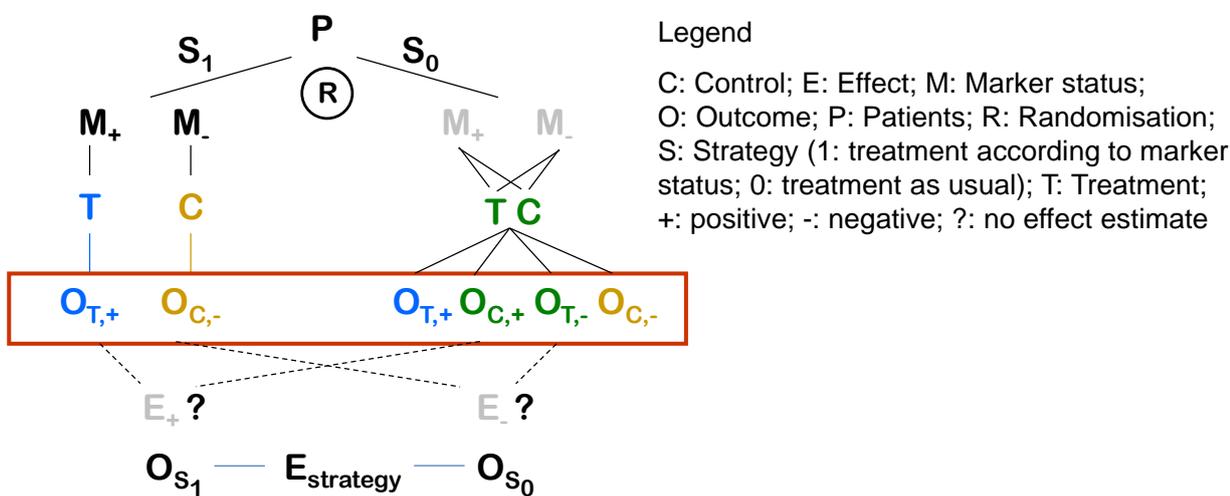
340 benefit of a biomarker with regard to the optimal choice of treatment [43]. Such a benefit  
 341 can only be directly derived if the study is able to identify patients with an extremely low (or  
 342 high) risk of the unfavourable patient-relevant event, as these patients are highly unlikely  
 343 to benefit from the new (or existing) treatment.

344 **2.4. Biomarker-strategy design**

345  
 346 In a biomarker-strategy design an RCT is conducted to determine whether a strategy using  
 347 a biomarker to choose a treatment is superior to a conventional strategy without this  
 348 biomarker (see figure 4). A clear advantage of this design is that the direct effect of  
 349 applying the test in patients can be evaluated [35]. In addition, on a population level an  
 350 unbiased estimate is provided of the effect of using a biomarker-based strategy to inform  
 351 the choice of treatment.

352 The biomarker strategy design is typically used for the evaluation of screening tests  
 353 [44,45] but can also be used for the evaluation of any other diagnostic test [46,47]. In  
 354 particular, the question of the benefit of serial monitoring or other complex strategies can  
 355 often be clarified only with this type of design [48,49].

356  
 357



358  
 359 Figure 4: Biomarker-strategy design

360  
 361 A disadvantage of this design is that the test and treatment components of the biomarker  
 362 strategy cannot be evaluated separately. A further disadvantage is that this design is less  
 363 efficient than other designs (i.e. has less power and will require a larger number of  
 364 patients), as both treatment groups include patients with similar characteristics who

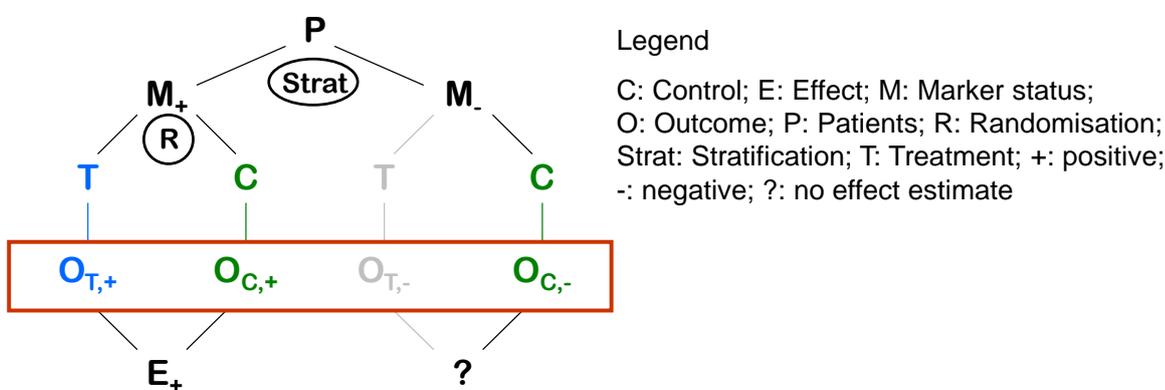
365 received identical treatments. This diminishes the contrast between the groups [50]. In the  
 366 extreme case – if the same number of marker-positive and marker-negative patients is  
 367 included and all patients in the control group receive the same treatment – this may apply  
 368 to half of the patient population.

369 **2.5. Hybrid design**

370

371 Several modifications of the above-mentioned study designs are available and can also be  
 372 combined with each other; for example, an enrichment design in marker-positive patients  
 373 with a single-arm design in marker-negative ones, or an enrichment design with a  
 374 subsequent randomise-all design [31,51].

375



376

377 Figure 5: Example of a hybrid design (enrichment for M<sub>+</sub>, single-arm for M<sub>-</sub>)

378 In addition, it is possible to examine several biomarkers and several treatment options  
 379 within the same study or compare various test-treatment strategies with each other. To  
 380 present all of these additional options would go beyond the scope of this reflection paper.  
 381 Table 2 summarises the possible conclusions that can be drawn from the study designs  
 382 outlined above and presents examples from the literature (not restricted to molecular-  
 383 biological markers).

384

385 Table 2: Study designs – Implications for possible conclusions

Design	Allows conclusions with regard to ...	Prognosis	Treatment effect	Treatment x marker interaction	Effect of testing (direct + indirect)	Examples
Randomise-all		Yes	Yes	Yes	No	[32,34,52-55]
Enrichment		In M <sub>+</sub> only	In M <sub>+</sub> only	No	No	[38-41,56-58]
Single-arm		In C only	No	No	No	- <sup>a</sup>
Biomarker-strategy		No	No	No	Yes	[46,59-61]
Example of a hybrid design (enrichment + single-arm)		In M <sub>+</sub> , C only	In M <sub>+</sub> only	If prognosis in M <sub>+</sub> , C is excellent or very poor (qualitative interpretation)	No	[62-65]

386 a: No examples presented, as a vast number of prognostic studies are available in the literature [66-68].

387

388 **2.6. Handling the situation of insufficient (direct) evidence for the benefit**  
389 **assessment of co-dependent technologies**  
390

391 Whether the use of a specific design is appropriate depends on what (relevant) question is  
392 asked and whether the assumptions made to interpret the results are acceptable.

393 Unfortunately, of the designs presented above, in practice often only (prognostic) single-  
394 arm studies or at best studies with an enrichment design are available for the evaluation of  
395 test-treatment strategies. However, conclusions on the benefit of a strategy can only be  
396 drawn from these study designs under stringent assumptions. In principle, two possibilities  
397 exist: if the assumptions required to determine a benefit are inappropriate (i.e. are not  
398 based on robust values), then a conclusion of no hint of a benefit is drawn. This is  
399 currently the standard approach applied, for example, by the German Institute for Quality  
400 and Efficiency in Health Care (IQWiG) [69]. Alternatively, for the (common) situation where  
401 there is a lack of direct evidence of the benefit of a diagnostic test, a “linked evidence  
402 approach” (LEA) may be applied. This approach was developed by the Australian Medical  
403 Services Advisory Committee (MSAC) [70-72] and “involves the narrative linking of  
404 evidence assessing components of a test-treatment pathway in order to predict the likely  
405 impact of testing on patient health outcomes” [72]. This means that results from diagnostic  
406 accuracy studies investigating a new test versus a reference test are linked to results from  
407 treatment studies in which the reference test served as an inclusion criterion [70].  
408 However, the LEA requires the availability of a reference standard that generally aims to  
409 identify the same patients as the new test. But many new genetic or molecular tests do not  
410 fulfil this requirement, as their aim is to identify patients with new characteristics (e.g.  
411 previously unknown biomarker status).

412 In addition, the LEA may be affected by bias or variation; for instance, the characteristics  
413 (e.g. demographic features or disease severity) of the patients included in the diagnostic  
414 and treatment studies may differ [70]. As with an indirect comparison of interventions,  
415 these characteristics must therefore be comparable. However, a further problem arises,  
416 namely, how to define thresholds to determine whether comparability is sufficient. The  
417 situation is easier if a clinical trial has already shown a benefit for a particular biomarker.  
418 For an alternative biomarker, it would be sufficient to determine that it identifies the same  
419 population as the first biomarker, that is, to determine that the results of the two tests  
420 agree [73]. Methods for this type of evaluation are available [74]. However, measures of  
421 overall agreement should generally be avoided, and as with equivalence hypothesis

422 testing, thresholds must be defined to determine whether positive percent agreement is  
423 sufficient.

### 424 3. Discussion

425

426 The concept of PM, that is, the selection of a specific treatment option on the basis of  
427 patient characteristics (predictive biomarkers) that interact with treatment effects, is not  
428 really new [75] – medical interventions have always been chosen on the basis of some  
429 form of diagnosis, mostly “classical” pathological and clinical signs and symptoms. The  
430 novelty of the current approach merely consists in the increased use of information at a  
431 molecular level as stratification characteristics (hence the name “stratified” or “precision”  
432 medicine). In the opinion of the authors of this reflection paper, no specific new methods  
433 are required to assess the (diagnostic/prognostic and therapeutic) PM technologies. This  
434 is because a methodological framework has been available for decades to estimate  
435 treatment effects in the most unbiased manner possible and to estimate different treatment  
436 effects in subgroups. However, what is required is the conjoint assessment of these  
437 technologies and possibly a new regulatory framework.

438 PM can help to change subgroup analyses from being viewed as a questionable  
439 methodological approach (“Subgroups kill people“ [76]) to being viewed as a recognised  
440 one (“Not doing subgroup analyses has very probably killed more people“ [77]). PM can  
441 thereby help to ease the way for stratified therapeutic strategies with more targeted and  
442 effective treatments.

443 While PM encompasses a wide range of diagnostic, prognostic, monitoring, and other  
444 technologies, the general principle of benefit assessment (i.e. the comparison of the use  
445 versus non-use of the new PM technology) applies to all of them. The ultimate goal is to  
446 demonstrate clinical utility (see, for example, [48]).

447 Due to rapid medical progress, for example, in the field of genomic research in cancer, as  
448 already stated, some researchers call for novel assessment methods in HTA [11]. For  
449 instance, if one considers the use of PM in lung cancer treatment, which involves highly  
450 complex PM strategies with various treatment choices based on simultaneous testing of  
451 multiple biomarkers [78], it is obvious that the patient-relevant benefit of these highly  
452 complex strategies compared with the current standard strategy has to be demonstrated.  
453 However, this can be evaluated within adequately controlled trials [79-81], so that  
454 traditional HTA methods can be used for the assessment. This means that the current  
455 EUnetHTA methodological guidelines for the REA of pharmaceuticals could also be used

456 to assess intervention trials of PM technologies (e.g. the guidelines on assessment of the  
457 internal validity of clinical trials, the applicability of evidence, and the use of clinical  
458 endpoints [82]). However, existing methods may need to be adapted. For instance, the  
459 further development of statistical methods for subgroup analyses is desirable: there is a  
460 need for a framework to exclude an irrelevant quantitative interaction between the  
461 biomarker and the treatment, or – vice versa – to establish a relevant quantitative  
462 interaction. In addition, the combination of confirmatory approaches for testing treatment  
463 effects in an entire study population and in subgroups is currently being discussed, taking  
464 the problem of multiple testing into account [51,83]. However, these already existing  
465 methods are practically unused so far in studies of PM technologies.

466 Furthermore, in the early stages of the (concomitant) development of biomarker-based  
467 diagnostics and biomarker-targeted treatments, (new) adaptive designs may play a role in  
468 Phase II studies in the efficient selection of promising biomarker-treatment combinations  
469 for subsequent Phase III studies [51].

470 The previously separate development and assessment of diagnostic tests and therapeutic  
471 interventions is therefore becoming increasingly obsolete. However, a conjoint assessment  
472 is not the current standard approach [84]. In the EU and the USA, the market access of  
473 diagnostics and drugs is still regulated separately. The regions differ in their way of  
474 handling companion diagnostics: As summarised by Byron et al. from the UK National  
475 Institute for Health and Care Excellence (NICE), in the EU “the licensed indication of a  
476 pharmaceutical may require the use of a companion diagnostic but the specific test for  
477 determining the mutation status is not normally stipulated.” In contrast, in the USA, “the  
478 regulatory process examines the suitability of a specific test for selecting patients for  
479 treatment with the corresponding pharmaceutical, and this test is stipulated in the  
480 licensing” [73]. The current regulatory processes can lead to the situation that, “even in  
481 cases of co-developed [drug-diagnostic] combinations drug reimbursement does not  
482 necessarily imply diagnostic reimbursement” [85]. Some governmental and HTA bodies  
483 have reacted to the current challenges: For instance, NICE has developed a policy for  
484 considering companion diagnostics using its Technology Appraisal and Diagnostics  
485 Assessment Programme [73]. The Australian government supported Merlin et al's  
486 development of a national 5-component framework (“context, clinical benefit, evidence  
487 translation, cost-effectiveness, and financial impact”) for the HTA of PM [86]. Its  
488 introduction was accompanied by the establishment of the Health Technology Assessment

489 Access Point (HTAAP) to coordinate the assessment of companion diagnostics within the  
490 HTA process.

491 In the development and assessment of biomarkers, the “traditional” criteria of technical-  
492 analytical validity and clinical validity are still currently described as important steps in the  
493 pertinent methods papers [12,87-90]. However, the following problems should be noted:  
494 Firstly, according to the experiences of the Evaluation of Genomic Applications in Practice  
495 and Prevention (EGAPP) Working Group, evidence on the analytical validity of genomic  
496 biomarkers is sparse [91], that is, obtaining reliable and unbiased estimates to determine  
497 analytical validity is particularly challenging [91]. For instance, a search in bibliographic  
498 databases is generally insufficient to identify all of the relevant information; additional  
499 searches for unpublished data from companies and laboratories also need to be  
500 conducted. Secondly, there are specific problems with the analytical “gold standard”, for  
501 example, in the case of tumour gene-expression profiling in breast cancer, where no real  
502 gold standard existed at the time of evaluation [91,92]. Thirdly, the interpretation of  
503 genomic results may be hampered by DNA damage following formalin fixation [93]. And  
504 fourthly, considering clinical validity, there may be differences between the central lab test  
505 used for the (Phase 3) clinical trial and the test used in a routine (“real-life”) lab setting. In  
506 clinical practice the results of the companion diagnostic may differ from the test used in  
507 central lab conditions [94]. Beyond these problems, there is a general consensus that  
508 clinical utility must ultimately be proven [89,95,96]. For a better understanding of this issue,  
509 it is crucial to distinguish between prognostic and predictive biomarkers [90].

510 In principle, RCTs represent the highest level of evidence in the assessment of biomarkers  
511 for the stratification of patients. However, such studies are rarely conducted. To infer from  
512 this current paucity of RCT-based evidence that lower-quality study designs should be  
513 used to assess PM technologies increases the risk of biased conclusions in HTA. On a  
514 system level this may reduce the incentive to conduct more studies with higher-level  
515 evidence.

516 In general, the more a patient population in a clinical study is stratified, the smaller the  
517 population for analysis will become. It may thus be difficult to recruit the number of patients  
518 required to reach robust conclusions. However, this problem applies not only to  
519 randomised studies, but to all study designs. The first approach to solve this problem  
520 should thus avoid resorting to study designs of a lower evidence level. Instead, the  
521 creation of multi-institutional and international networks is needed to create a broader

522 basis for patient recruitment [97]. Commendable examples include the Cystic Fibrosis  
523 Therapeutics Development Network (CF TDN) [98] and the European Cystic Fibrosis  
524 Society-Clinical Trials Network (ECFS-CTN) [99].

525 In addition, data from completed studies should be made publicly available so that the  
526 interaction between a specific biomarker and the results of treatment can be analysed,  
527 also retrospectively (prospective-retrospective design). However, this requires the  
528 establishment of structures for storing and processing samples of patients included in the  
529 studies (biomaterial banks). Furthermore, the identification of new treatment targets and  
530 the implementation of the corresponding treatment approaches do not necessarily have to  
531 result in smaller patient populations. For instance, in oncology the role of basket and  
532 umbrella studies is currently being discussed. The former include studies of multiple  
533 tumour types harbouring the same mutation; the latter include studies of a single tumour  
534 type harbouring different mutations [100,101]. In both types of studies the targeted therapy  
535 is compared with the current standard therapy.

536 And finally: if “personalised” treatment effects are comparatively large – as is claimed by  
537 some advocates of PM – the corresponding trials might require only a small sample size  
538 and a limited amount of resources [102].

539 Annotation: Several projects, some in collaboration with EUnetHTA or EUnetHTA member  
540 organizations, are currently being conducted within the Innovative Medicines Initiative (IMI)  
541 launched by the EU and the pharmaceutical industry [103]. The aim of the initiative is to  
542 speed up the development and market access of promising medical technologies. A  
543 discussion of the IMI projects (e.g. ADAPT-SMART [104], GetReal [105,106]) would go  
544 beyond the scope of this reflection paper. It remains to be seen to what extent their results  
545 will have consequences for the assessment of PM technologies or will lead to the  
546 development of innovative study designs that could markedly help improve the evidence  
547 base.

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550

## 551 **Annexe 1. Definitions of key terms and concepts**

552

553 According to the Biomarker Definitions Working Group, a **biomarker** is defined as a  
554 “characteristic that is objectively measured and evaluated as an indicator of normal  
555 biological processes, pathogenic processes, or pharmacologic responses to a therapeutic  
556 intervention” [107]. Biomarkers are used as diagnostic tools for the identification of patients  
557 with a disease, as tools for staging of disease, as indicators of disease prognosis, and for  
558 prediction and monitoring of clinical response to an intervention [107].

559 The aim of a **diagnostic test** is to distinguish between individuals with and those without a  
560 particular disease. The quality of a diagnostic test is described by means of diagnostic  
561 accuracy measures such as sensitivity and specificity or likelihood ratios [108]. Together  
562 with the known or assumed prevalence of a disease, these measures can be used to  
563 calculate predictive values describing the likelihood that a given test result correctly  
564 identifies an individual as having or not having a disease.

565 A **prognostic test** identifies “patients with differing risks of a specific outcome, such as  
566 progression or death” [109]. The relationship between the test result and the frequency of  
567 an outcome is typically described by means of epidemiological measures such as the  
568 relative risk, hazard ratio, or odds ratio. In principle, the above-mentioned diagnostic  
569 accuracy measures can also be used for this purpose.

570 A **predictive test** “predicts the differential efficacy (benefit) of a particular therapy based  
571 on the marker status” [109]. This capability of a test is described as the interaction  
572 between the marker status (i.e. the test result) and the benefit of treatment. If no  
573 interaction exists, all patients benefit to the same extent from treatment, independently of  
574 the test result. In the case of a quantitative interaction, all patients benefit from treatment;  
575 however, the extent of benefit differs depending on the test result. In the case of a  
576 qualitative interaction, only a particular subgroup benefits from treatment, whereas the  
577 other subgroup experiences no benefit or even harm. Only the results of predictive tests  
578 can guide the choice of treatment; purely prognostic tests cannot [109]. However, a test  
579 may be both prognostic and predictive or it may be predictive without being prognostic  
580 [110].

581 The **clinical validity** of a test, i.e. its diagnostic or prognostic accuracy, is the “ability to  
582 detect or predict the associated disorder” [111]; the **clinical utility** of a test is the “ability to

583 affect clinical decisions and to improve patient outcomes in clinical practice” [111]. Hence,  
584 clinical utility describes the consequences of applying the information obtained from a  
585 medical test to the care of patients. Such consequences are not necessarily beneficial to  
586 patients, even if the information applied is (formally) correct [35].

587 **Annexe 2. Bibliography**

588

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