Food and Drug Administration
Center for Drug Evaluation and Research

Final Summary Minutes of the Oncologic Drugs Advisory Committee Meeting
June 24, 2021

Location: Please note that due to the impact of the COVID-19 pandemic, all meeting participants joined this advisory committee meeting via an online teleconferencing platform.

Topic: The committee discussed biologics license application (BLA) 761209 for retifanlimab injection, submitted by Incyte Corporation. The proposed indication (use) for this product is for the treatment of adult patients with locally advanced or metastatic squamous carcinoma of the anal canal (SCAC) who have progressed on or who are intolerant of platinum-based chemotherapy.

These summary minutes for the June 24, 2021 meeting of the Oncologic Drugs Advisory Committee (ODAC) of the Food and Drug Administration were approved on July 23, 2021.

I certify that I attended the June 24, 2021 meeting of the ODAC of the Food and Drug Administration and that these minutes accurately reflect what transpired.

/s/
She-Chia Chen, PharmD
Designated Federal Officer, ODAC

/s/
Philip C. Hoffman, MD
Chairperson, ODAC

Final Summary Minutes of the Oncologic Drugs Advisory Committee Meeting
June 24, 2021

The Oncologic Drugs Advisory Committee (ODAC) of the Food and Drug Administration, Center for Drug Evaluation and Research met on June 24, 2021. The meeting presentations were heard, viewed, captioned, and recorded through an online teleconferencing platform. Prior to the meeting, the members and temporary voting members were provided the briefing materials from the FDA and Incyte Corporation. The meeting was called to order by Philip C. Hoffman, MD (Chairperson). The conflict of interest statement was read into the record by She-Chia Chen, PharmD (Designated Federal Officer). There were approximately 440 people online. There were seven Open Public Hearing (OPH) speaker presentations.

A verbatim transcript will be available, in most instances, at approximately ten to twelve weeks following the meeting date.

Agenda: The committee discussed biologics license application (BLA) 761209 for retifanlimab injection, submitted by Incyte Corporation. The proposed indication (use) for this product is for the treatment of adult patients with locally advanced or metastatic squamous carcinoma of the anal canal (SCAC) who have progressed on or who are intolerant of platinum-based chemotherapy.

Attendance:
ODAC Members Present (Voting): Massimo Cristofanilli, MD, FACP; Jorge A. Garcia, MD, FACP; Susan Halabi, PhD; Philip C. Hoffman, MD (Chairperson); Christopher H. Lieu, MD; David E. Mitchell (Consumer Representative); Jorge J. Nieva, MD; Ashley Rosko, MD

ODAC Members Not Present (Voting): Jaffer A. Ajani, MD; Ranjana H. Advani, MD; Alberto S. Pappo, MD; Anthony D. Sung, MD

ODAC Member Not Present (Non-Voting): Jonathan D. Cheng, MD (Industry Representative)

Temporary Members (Voting): Neil Berlin (Patient Representative); Marcia Cruz-Correa, MD, PhD, AGAF, FASGE; Pamela L. Kunz, MD; Mark A. Lewis, MD; Kathryn A. Lurain, MD; Diane Reidy-Lagunes, MD; Kim Reiss Binder, MD; Hanna K. Sanoff, MD, MPH; Colin D. Weekes, MD, PhD, FASCO

Acting Industry Representative to the Committee (Non-Voting): Albert L. Kraus, PhD

FDA Participants (Non-Voting): Richard Pazdur, MD; Julia Beaver, MD; Paul Kluetz, MD; Steven Lemery, MD, MHS; ‘Lola Fashoyin-Aje, MD, MPH; Sandra Casak, MD; May Tun Saung, MD

Designated Federal Officer (Non-Voting): She-Chia Chen, PharmD

Open Public Hearing Speakers: NFN Scout, MA, PhD (National LGBT Cancer Network); May Cho, MD; Martha Raymond, MA Ed. (GI Cancers Alliance, Inc.); Kim M. Czubaruk, Esq. (Cancer Support Community); Karen Cadenhead; Paul Romesser, MD; Lillian Kreppel (HPV Alliance)

The agenda was as follows:

Call to Order and Introduction of Committee	**Philip C. Hoffman, MD** Chairperson, ODAC
Conflict of Interest Statement	**She-Chia Chen, PharmD** Designated Federal Officer, ODAC
FDA Introductory Comments	**Sandra Casak, MD** Team Leader (Acting) Division of Oncology 3 (DO3) Office of Oncologic Diseases (OOD) Office of New Drugs (OND), CDER, FDA
APPLICANT PRESENTATIONS	**Incyte Corporation**
Introduction	**Michael J. McGraw, PharmD, MS** Executive Director, Global Regulatory Affairs Incyte Corporation
Unmet Need	**Marwan Fakih, MD** Professor, Medical Oncology and Therapeutics Research Judy and Bernard Briskin Distinguished Director in Clinical Research City of Hope Comprehensive Cancer Center
Efficacy and Safety	**Mark Cornfeld, MD, MPH** Vice President, Immuno-Oncology Drug Development Incyte Corporation
Clinical Perspective	**Marwan Fakih, MD**
Benefit-Risk	**Mark Cornfeld, MD, MPH**
FDA PRESENTATION	
BLA 761209 - Retifanlimab	**May Tun Saung, MD** Clinical Reviewer DO3, OOD, OND, CDER, FDA
Clarifying Questions to Presenters	
LUNCH	

OPEN PUBLIC HEARING

Questions to the Committee/Committee Discussion

ADJOURNMENT

Questions to the Committee:

1. **DISCUSSION:** Discuss whether the demonstrated magnitude of effect on overall response rate (and duration of response) is clinically meaningful and reasonably likely to predict clinical benefit in patients with recurrent advanced or metastatic squamous cell carcinoma of the anal canal.

   Committee Discussion: *A majority of the Committee members cautioned that the POD1UM-202 clinical trial did not appear to demonstrate a magnitude of effect on overall response rate (ORR) that is clinically meaningful and reasonably likely to predict clinical benefit in patients with recurrent advanced or metastatic squamous cell carcinoma of the anal canal. Particularly, some Committee members commented that there were historical accelerated approvals of PD-1 or PD-L1 inhibitors based on low response rates; however, the confirmatory trials were not successful in demonstrating benefit. Other Committee members were concerned that a small portion of the trial had demonstrable clinical benefit, and identified potential confounding effects of utilizing stable disease as an endpoint when there was no control arm. Some Committee members were worried that the trial had a negative result scientifically, as the primary endpoint did not achieve the study's pre-specified goal, particularly in a single arm trial, and questioned what was the threshold of clinically meaningful data. One Committee member shared that this disease state was virally driven, and it was important to recognize that, as it may affect the magnitude of effect on ORR when compared to other diseases being studied in trials investigating checkpoint inhibitors. Please see the transcript for details of the Committee's discussion.*

2. **VOTE:** Should a regulatory decision on retifanlimab for the treatment of advanced or metastatic SCAC be deferred until further data are available from clinical trial POD1UM-303?

   Vote Result: Yes: 13 No: 4 Abstain: 0

   Committee Discussion: *A majority of the Committee members voted, "Yes," that a regulatory decision on retifanlimab for the treatment of advanced or metastatic SCAC should be deferred until further data are available from clinical trial POD1UM-303. These members expressed concerns about the existing strength of evidence from the single-arm phase 2 POD1UM-202 trial, which had an overall response rate (ORR) as the primary endpoint. The members further commented on their concerns of the low ORR (approximately 14%) and questioned whether the low ORR was clinically meaningful and reasonably likely to predict clinical benefit in this patient population. The Committee members who voted "No" noted that this drug product could provide a treatment option for this patient*

population, particularly the HIV (+) subset. Please see the transcript for details of the Committee's discussion.

The meeting was adjourned at approximately 2:40 p.m.