

# **Oncologic Drugs Advisory Committee Meeting**

### Introductory Comments

Rob Sokolic, MD Chief, Malignant Hematology Branch Office of Clinical Evaluation Office of Therapeutic Products Center for Biologics Evaluation and Research, FDA March 15, 2024



# Ciltacabtagene Autoleucel

- **Product Class:** BCMA-directed autologous T-cell immunotherapy
- Current Approval:
  - For the treatment of adult patients with relapsed or refractory multiple myeloma after four or more prior lines of therapy, including a proteasome inhibitor, an immunomodulatory agent, and an anti-CD38 monoclonal antibody.
- Proposed Indication:
  - For the treatment of adult patients with relapsed or refractory multiple myeloma who have received at least 1 prior line of therapy, including a proteasome inhibitor and an immunomodulatory agent, and are refractory to lenalidomide.
- **Proposed Approval Pathway:** Traditional Approval



# Outline

- Meeting Purpose
- Overview of the CARTITUDE-4 trial
- Questions for Discussion



# Outline

- Meeting Purpose
- Overview of the CARTITUDE-4 trial
- Questions for Discussion



# **Meeting Purpose**

- Discuss and provide input on adequacy of data from the CARTITUDE-4 study to demonstrate the safety and effectiveness of ciltacabtagene autoleucel as treatment for RRMM
  - PFS benefit
  - Crossing hazards pattern
  - Decreased OS through 10 months



# Outline

- Meeting Purpose
- Overview of the CARTITUDE-4 trial
- Questions for Discussion

# CARTITUDE-4 Study



Design: Open-label randomized trial

Participants: 419 participants with RRMM after 1-3 Prior lines of therapy including a proteasome inhibitor and an immunomodulatory agent refractory to lenalidomide **Treatment:** Cilta-cel (single infusion) or standard of care until progression of disease or intolerable adverse effects.

Treatment Response Assessment: 2016 IMWG response criteria

**Results:** 

- Statistically significant improvement in PFS (12 months versus not reached)
- Hazard ratio 0.41
- p < 0.0001

Abbreviation: RRMM, Relapsed and/or Refractory Multiple Myeloma Source: San Miguel, et al. NEJM 2023



# Progression-Free Survival at Interim Analysis by ITT





# Overall Survival at Interim Analysis by ITT





# Outline

- Meeting Purpose
- Overview of the CARTITUDE-4 trial
- Questions for Discussion



# Summary of the Review Issues

- Ciltacabtagene autoleucel led to a significantly improved rate of progression-free survival, but with a decrement in overall survival in the first 10 months of the trial.
- The decrement in overall survival calls into question whether the risk-benefit assessment is favorable.



## **Discussion Questions**

- Discuss whether the results of CARTITUDE-4 are sufficient to support a positive risk-benefit assessment of ciltacabtagene autoleucel for the proposed indication.
- Is the risk of early death associated with ciltacabtagene autoleucel treatment acceptable in the context of the PFS benefit?



# **Voting Question**

• Is the risk-benefit assessment for ciltacabtagene autoleucel for the proposed indication, favorable?





# CILTACABTAGENE AUTOLEUCEL (CARVYKTI) sBLA 125746.74

# Oncologic Drugs Advisory Committee Meeting March 15, 2024

Helkha Peredo-Pinto, MD, MPH Medical Officer/Clinical Reviewer Malignant Hematology Branch, Division of Clinical Evaluation Hematology Office of Clinical Evaluation Office of Therapeutic Products, CBER Cong Wang, PhD Mathematical Statistician Therapeutics Evaluation Branch 1, Division of Biostatistics Office of Biostatistics and Pharmacovigilance CBER

# **Review Team**



Center for Biologics Evaluation and Research

Office of Therapeutic Products Nicole Verdun, MD

Office of Clinical Evaluation Lola Fashoyin-Aje, MD, MPH

<u>Division of Clinical Evaluation- Hematology</u> Robert Sokolic, MD Helkha Peredo-Pinto, MD, MPH

Division of Pharmacovigilance Meghna Alimchandani, MD Mary Rubin, MD

<u>Clinical Pharmacology</u> Xiaofei Wang, PhD Center for Biologics Evaluation and Research (continued)

Division of Biostatistics John Scott, PhD Boguang Zhen, PhD Zhenzhen Xu, PhD Cong Wang, PhD

Oncology Center of Excellence

Marc R. Theoret, MD Bindu Kanapuru, MD



# Main Topic for Discussion

# Increased rate of early death in the ciltacabtagene autoleucel arm



# Outline

- Treatment Landscape
- Regulatory History of ciltacabtagene autoleucel
- CARTITUDE-4: Efficacy and Safety Results
- Main Topic for Discussion
- Statistical Considerations
- Discussion and Voting Questions



# Treatment Landscape: RRMM After Initial Therapy

Regimen	Indication	Other Options
Isatuximab with Pd Isatuximab with Kd	≥2L including Len and PI 1-3L	Use drugs/classes not exposed or exposed to >1 prior line
Daratumumb with Pd	≥2L including Len and PI	Autologous transplant
Daratumumb with Kd	1-3L	Bendamustine containing regimens
Pomalidomide with Vd	≥2L including Len and PI	Combination chemotherapy: VTD-PACE, DCEP
Elotuzumab with Pd	≥2L including Len and PI	Cytoxan in combination with carfilzomib
Selinexor with Dex	≥4L, including 2 PIs, 2 IMiDs and anti- CD38	
Selinexor with Vd	≥1L	

Sources: Moreau, P, et al. Lancet Oncology, 2021; NCCN Guidelines, 2024

Abbreviations: d, dexamethasone; D, daratumumab; IMiD, immunomodulatory drug; K, kyprolis;

P, pomalidomide; PI, proteasome inhibitor; V, velcade

# Ciltacabtagene autoleucel (cilta-cel)



- Autologous T cell product transduced with a lentiviral vector (LVV) to express a chimeric antigen receptor (CAR) targeting BCMA
- Approved February 28, 2022, based on CARTITUDE-1 trial
  - Indication: Adult patients with relapsed or refractory multiple myeloma after four or more prior lines of systemic therapy, including an immunomodulatory agent, a proteasome inhibitor and an anti-CD 38 monoclonal antibody
  - CARTITUDE-1: Single arm trial with 97 patients who received a median of 6 (range 3-18) prior lines of therapy
    - ORR: 97.9 % (95% CI: 92.7, 99.7)
    - Median DOR: not reached (95% CI: 21.8, NE)
  - Dosage: single dose infusion of 0.5-1.0 x 10<sup>6</sup> CAR positive viable T cells per kg of body weight (max 1.0 x 10<sup>8</sup> CAR-positive T cells)
  - Boxed warning in USPI: CRS, NT, HLH/MAS, Prolonged or Recurrent Cytopenias, Secondary Primary Malignancies

Abbreviations: BCMA, B-cell maturation antigen; CAR, Chimeric Antigen Receptor; CRS, Cytokine release syndrome; DOR, Duration of Response; HLH/MAS, Hemophagocytic lymphohystiocitosis/Macrophage activation syndrome; NT, Neurotoxicity ORR, overall response rate **www.fda.gov** 



# **Current Supplemental BLA**

- Submitted on June 6, 2023
- CARTITUDE-4 (data cutoff date of November 1, 2022)
- Proposed Indication: for the treatment of adult patients with relapsed or refractory multiple myeloma, who have received at least 1 prior line of therapy, including a proteasome inhibitor, and an immunomodulatory agent, and are refractory to lenalidomide.

# **CARTITUDE-4 Study**





### <sup>i</sup> Randomization stratified by (1) PVD vs. DPd (2) ISS Score (I vs. II vs. III) and (3) Number of previous lines (1 vs. 2 or 3)

#### Source: FDA

Abbreviations: d, dexamethasone; D, Daratumumab; IRC, Independent Review Committee; ISS, International Staging System; IV, intravenous; LDC, lymphodepleting chemotherapy; ORR, overall response rate; OS, overall survival; P, pomalidomide; PFS, progression-free survival; PI, proteasome inhibitor; PRO, patient-reported outcomes; RRMM, relapsed refractory multiple myeloma; V, Velcade (bortezomib)



# Efficacy Analysis Plan - CARTITUDE-4



Source: FDA

Abbreviations: HR, hazard ratio; IA, interim analysis; IF, information fraction; OS, overall survival; PFS, progression-free survival



# **Demographic Characteristics**

	Cilta-cel (N=208)	Standard Therapy (N=211)
Age	-	-
Median, years (range)	61.5 (27-78)	61(35-80)
<65, %	61	62
65-75, %	37.5	36
>75, %	1.9	1.9
Race or ethnic group	-	-
Asian, %	8	10
Black or African American, %	3	3
Hispanic, %	9	5
White, %	76	74
Not reported, %	14	12
Geographic region	-	-
Europe	61.5	61
North America	15	15

Source: FDA, Data cutoff November 1, 2022



### **Disease and Treatment Characteristics**

	Cilta-cel (N=208)	Standard Therapy (N=211)
ECOG performance status score	-	-
0/1/2, %	55/44/1	57/42/1
International Staging System stage, %	-	-
I/II/III, %	65/30/6	63/30/7
Cytogenetics	-	-
High Risk, %*	39	38
Extramedullary plasmacytoma	-	-
Present	21	17
Prior lines of therapy	-	-
1/2/3	33/40/27	32/41/27
Previous anti-CD38 antibody	26	26
Refractory status	-	-
IMiD/PI/anti-CD38 antibodies (%)	100/50/24	100/46/22
Triple-class^	14	16

Source: FDA, Data cutoff November 1, 2022

\* High risk cytogenetics by FISH include t(4;14), t(14;16), deletion(17p)

^ Triple-class refractory: refractory to at least one PI, one IMiD, and one anti-CD38 monoclonal antibody.

# Progression-Free Survival, Intention-to-Treat (ITT)



	Cilta-cel (N=208)	Standard Therapy (N=211)
Events, n (%)	65 (31)	122 (58)
PD, n (%)	48 (23)	118 (56)
Death, n (%)	17 (8)	4 (2)
Median, months (95% Cl)	NE (22.8, NE)	11.8 (9.7,13.8)
Hazard ratio (95% CI)	0.41 (0.30, 0.56)	
p-value	<0.0001	

PFS per IMWG 2016 consensus criteria for response Median is based on Kaplan-Meier estimate

Source: FDA

Data cutoff November 1, 2022

Abbreviations: CI, confidence interval; IMWG, International Myeloma Working Group; NE, not evaluable;

PD, progressive disease; PFS, progression-free survival

#### www.fda.gov

FDA



# Overall Survival, Interim Analysis-1 (ITT)



# FDA

- Statistically significant improvement in median PFS with ciltacel compared to standard therapy
  - Median PFS was not reached for cilta-cel compared to 12 months for the standard therapy

Summary: Efficacy Results

- Higher proportion of PFS events in the cilta-cel arm are due to deaths compared to standard therapy.
  - 17 deaths in cilta-cel arm (8%) versus only 4 deaths in the standard therapy arm (2%)
- OS immature (IF: 34%)
  - Observed early OS detriment in the cilta-cel arm with pattern of crossing of the curves

# FDA

# Overview: Safety CARTITUDE-4

Adverse Event	Cilta-cel* (N=188) %	Standard Therapy (N=208) %
Any TEAE	100	100
Any Grade 3-4	84	91
Grade 3	21	35
Grade 4	63	56
Serious AEs	37.8	38.9
AEs leading to death*	11	8

Source: FDA

Data cutoff November 1, 2022

\* Safety population includes subjects receiving conforming cilta-cel: treated under study and treated after progression Abbreviations: AE, adverse event; TEAE, treatment adverse event

# FDA

# **Adverse Events of Special Interest**

	Cilta-cel (N=188) %		Standard Therapy (N=208) %	
AESI	Any Grade	Grade ≥3	Any Grade	Grade ≥3
CRS	77	3	1	0
Neurotoxicity	23	4	0	0
HLH/MAS	1	0.5	0	0
Infections	57	24.5	71	22.6
Secondary primary malignancy	4.3	N/A	6.7	N/A
Hematologic neoplasm	1.6	1.6	0	-
Cytopenia *	-	-	-	-
Neutropenia	99	95	98	87
Thrombocytopenia	94	44	87	20

Source: FDA

Data cutoff November 1, 2022

\* Based on laboratory results

Safety population includes conformal cilta-cel including patients who received cilta-cel on progression as subsequent therapy. Abbreviations: AESI, adverse events of special interest; CRS, cytokine release syndrome; HLH/MAS, hemophagocytic lymphohistiocytosis

# Major Issue



### Increased rate of early deaths in the cilta-cel arm



Source: FDA



# Progression Free Survival, Intention-to-Treat (ITT)



	Cilta-cel (N=208)	Standard Therapy (N=211)
Events, n (%)	65 (31)	122 (58)
PD, n (%)	48 (23)	118 (56)
Death, n (%)	17 (8)	4 (2)
Median, months (95% CI)	NE (22.8, NE)	11.8 (9.7,13.8)
Hazard ratio (95% CI)	0.41 (0.30, 0.56)	
p-value	<0.0001	

PFS per IMWG 2016 consensus criteria for response Median is based on Kaplan-Meier estimate

#### Source: FDA

Data cutoff November 1, 2022 Abbreviations: CI, confidence interval; IMWG, International Myeloma Working Group; NE, not evaluable; PD, progressive disease; PFS, progression free survival



# Overview of Deaths, ITT Population

	Cilta-cel	Standard Therapy
	(N=208)	(N=211)
Deaths	%	%
Total deaths, ITT	18.8	22.3
Progressive disease	6.7	14.7
Adverse event	11	7.1
Death 0 to ≤10 months	14	12
Progressive disease	6.2	7.1
Adverse event	7.7	4.7
Death >10 months	4.8	10
Progressive disease	1.9	7
Adverse event	2.8	3.3

Data cutoff, November 1, 2022

Table includes deaths in all randomized subjects including three subjects who received nonconformal cilta-cel.

Table includes all deaths after treatment from AEs including infection related AEs following disease progression and subsequent AMT. Abbreviation: ITT, intent-to-treat



# Higher Rate of Death in First 10 Months After Randomization

	Cilta-cel (N=208) %	Standard Therapy (N=211) %	
Total	14	12	
Prior to treatment	4. 8	0.5	
PD	4.8	0.5	
AE	-	-	
After treatment	9.1*	11.3	
PD	1.4	7.1	
AE	7.7	4.2	

Source: FDA

Data cutoff November 1, 2022

\* 8/19 deaths occurred after receiving cilta-cel as subsequent anti-myeloma therapy following progression Abbreviations: AE, adverse event; PD, progressive disease; ST, standard therapy



Source: FDA, Data cutoff November 1, 2022



# Early Progressive Disease or Death

32 subjects in the cilta-cel arm had progressive disease or died prior to receiving cilta-cel

- 12 subjects never received cilta-cel
  - 10 subjects died within 10 months after randomization
- 20 received cilta-cel as subsequent therapy
  - 8 died within 10 months after randomization

# Bridging Therapy in Patients Receiving Cilta-cel as Per Study Treatment and Patients Who Progressed or Died Early

	Cilta-cel (N=208)		
	Cilta-cel Rapid PD or Deat		
	(N=176)	(N=32)	
Received BT (%)	100	100	
Type of BT (%)			
DPd	90	75	
PVd	10	25	
Duration of BT (months)			
Median (range)	1.6 (0.41, 6.1)	1.4 (0.03, 4.3)	
Number of cycles (%)			
1	33	25	
2	59	59	
3	18	9	
>4	3	6	
Time from leukapheresis to product release (days) Median (Range)	79 (45, 246)	55 (29 <i>,</i> 66)	

Source: FDA; Abbreviation: BT, bridging therapy

#### www.fda.gov

FDA



# Exploratory Analysis for Early Mortality, **Prognostic Factors**

	Cilta-cel	Standard Therapy	
	(N=208)	(N=211)	
Prognostic Factor	%	%	29 de
EMP	-	-	] 25 de
Present	4.8	3.8	thera
Absent	9	8	
R-ISS	-	-	
Stage III	1	2	No
Stage I/II	8/5	5/5	]
Cytogenetics	-	-	] sub
High-risk	6.2	4.7	ass
Absent high-risk	10	7.1	] 455
Age (years)			] obs
65-75	5	5	] mo
<65	9	7	
ECOG PS			] Cilta
1	9	7	Sour
0	4	5	]
Lines of therapy		-	
1	5	2	
2 or 3	9	9	]
Triple-class refractory		-	
Yes/No	2.8/11	2.8/9	]

ths in cilta-cel arm ths in standard y arm

prognostic group was ciated with erved early tality with -cel

e: FDA

# Deaths in Safety Population Within 90 Days of Treatment Start

FDA

	Cilta-cel (N=188)	Standard Therapy (N=208)
Deaths	%	%
Total deaths	13	22
Adverse event	11	8
Progressive disease	3	14
Deaths ≤90 days after treatment start	5	0
Adverse event	4	0
Progressive disease	0.5	0
Deaths >90 days after treatment start	8.5	22
Adverse event	6.4	8
Progressive disease	2	14

Source: FDA Data cutoff November 1, 2022



# **Death From TEAEs Safety Population**

Category	Cilta-cel (N=188) %	Standard Therapy (N=208) %
Total deaths	13	22
Adverse events	11	8
COVID-19 pneumoniae	3.7	0.5
Pneumoniae^	1	1.9
Sepsis	1.6	0.9
Hemorrhage*	4	0.9
CMV colitis	2	0
Others AE	1.6	3.4

Data cutoff November 1, 2022

^ Pneumoniae includes influenza pneumoniae, respiratory infection, pneumoniae, and pneumocystis jiroveci pneumonia

\* Hemorrhage includes intraparenchymal bleeding, intracranial hemorrhage, retroperitoneal bleed, and subdural hematoma

Abbreviations: AE, adverse events; CMV, cytomegalovirus; COVID-19, Coronavirus Disease 2019; JC, John Cunningham; TEAE, treatment adverse event



# Summary of Deaths

- Higher rate of death in the first 10 months in the ITT population: 14% in the cilta-cel arm versus 12% in the standard therapy arm
- Higher rate of deaths due to AEs in the safety population
- Higher rate of death from TEAEs within 90 days of treatment start: 4% in cilta-cel versus 0% in standard therapy arm in safety population



# **Overall Survival**

- OS is gold standard endpoint in Oncology
- OS is clinically meaningful measure of safety and efficacy
- OS plays an important role in the benefit-risk determination in the context of totality of data



# OS Results With Longer Follow-Up Data

Data Cutoff April 17, 2023

Data Cutoff December 13, 2023



www.fda.gov

\*Due to heavy censoring, longer term follow up is needed to confirm the OS benefit.



# **Uncertain Clinical Benefit**

- Improvement in PFS and Response rates
- Increased rate of early deaths in the cilta-cel arm, persisting for first 10 months
- Uncertainty in clinical benefit

# FDA's Efficacy Results





# FDA's Primary Concern

- Early OS detriment, in the context of PFS benefit
- Possible causes:
  - Delayed administration
  - Cilta-cel toxicity



# Duration of Increased Risk of Early Death

- FDA sought to quantify the duration of increased risk of early death in the cilta-cel arm compared to the standard therapy arm
- Piecewise hazard ratio assessment based on different landmark timepoints to estimate the treatment effect

# **Piecewise HR Assessment**

Time Interval	Piecewise HR	95% CI	
Time interval of 3 months			
0-≤3	6.24	(0.75, 51.85)	
3-≤6	1.07	(0.46, 2.47)	
6-≤9	0.65	(0.25, 1.68)	
9-≤12	0.72	(0.29, 1.78)	
Time interval of 5 months			
0-≤5	2.40	(0.99, 5.85)	
5-≤10	0.69	(0.33, 1.42)	
10-≤15	0.35	(0.14, 0.90)	
Time interval of 10 months			
0-≤10	1.16	(0.68, 1.99)	



Data cutoff November 1, 2022

\* >15 months not reported due to heavy censoring

FDA



# Patient-Reported Outcomes (PRO)

- PRO endpoint Time to Worsening of Symptoms in the MySIm-Q Total Symptom Score was not formally tested since it follows OS in statistical hierarchy
- Infrequent assessment of PROs early in trial during acute CAR T toxicity
- Longitudinal PRO data does not include experience of patients with early mortality



# Conclusions

- Cilta-cel in RRMM after 1-3 prior lines and lenalidomide refractory
  - PFS benefit
  - Improvement in ORR
- Increased rate of early death
  - Study was not designed to identify predictive factors for early mortality
  - Inherent risk of autologous CAR T therapy
- Uncertain benefit-risk of cilta-cel in the proposed population



# **Discussion Questions**

- Discuss whether the results of CARTITUDE-4 are sufficient to support a positive risk-benefit assessment of ciltacabtagene autoleucel for the proposed indication.
- Is the risk of early death associated with ciltacabtagene autoleucel treatment acceptable in the context of the PFS benefit?



# **Voting Question**

# Is the risk-benefit assessment for ciltacabtagene autoleucel for the proposed indication, favorable?

