

Name: Suzana Giffin, AVP
Company/Organization: Merck & Co., Inc.
Address: 2000 Galloping Hill Rd, Kenilworth, NJ 07033
Phone: 908-740-6708
Email: suzana.giffin@merck.com
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NCCN Guidelines Panel: NCCN Non-Melanoma Skin Cancer Panel

NCCN Non-Melanoma Skin Cancer Panel: On behalf of Merck & Co., Inc., I respectfully request the NCCN Non-Melanoma Skin Cancer Panel to review the enclosed information for KEYTRUDA[®] (pembrolizumab), in reference to treatment of patients with cutaneous squamous cell carcinoma (cSCC).

Specific Changes: We respectfully request that the NCCN Non-Melanoma Skin Cancer Panel consider the inclusion of KEYTRUDA as a treatment option for patients with locally advanced or regional disease that is not curable by surgery in the appropriate sections of the NCCN cSCC Guidelines v2.2020, including page SCC-F.

FDA Clearance: KEYTRUDA is indicated for the treatment of patients with recurrent or metastatic cSCC that is not curable by surgery or radiation. Please refer to the KEYTRUDA prescribing information for other FDA-approved indications.¹

Rationale: The CARSKIN trial², an open-label, uncontrolled, multicenter, phase II study evaluated the efficacy and safety of pembrolizumab 200 mg administered intravenously every 3 weeks as a first line treatment in patients with locally advanced, regional or metastatic cSCC. Most of the patients had local or regional disease (n=43/57); 12% with unresectable local disease and 63% with regional lymph node involvement. Primary end point in the primary cohort (n=39) was objective response rate at week 15 (ORR_{w15}). Secondary end points included disease control rate at week 15 (DCR), best ORR, progression-free survival (PFS), overall survival (OS), duration of response (DOR), and safety. An expansion cohort (n=18) was added to evaluate the ORR differences between PD-L1+ and PD-L1- patients. The primary cohort's ORR_{w15} was 41% (95% Confidence Interval [CI], 26%-58%). DCR at week 15 was 54% (95% CI, 37%-70%). Best responses were 8 partial and 8 complete responses. At a median follow-up of 22.4 months, respective median PFS, DOR, and OS were 6.7 months, not reached, and 25.3 months, respectively. ORR_{w15} for the entire population (n=57) was 42%; it was significantly higher for PD-L1+ patients (55% n=42) versus PD-L1- patients (17%, n=12; P = .02). Pembrolizumab-related adverse events affected 71% of the patients, and 4 (7%) were grade ≥ 3. The results of this trial support the antitumor activity of pembrolizumab as a first-line monotherapy in patients with locally advanced or regional cSCC.

The following resources are submitted to assist the committee with their review.

1. KEYTRUDA (pembrolizumab) prescribing information. Merck & Co., Inc.
2. Maubec E, Boubaya M, Petrow P, et al. Phase II study of pembrolizumab as first-line, single-drug therapy for patients with unresectable cutaneous squamous cell carcinomas. [published online ahead of print, 2020 July 30]. J Clin Oncol. 2020;38 doi: 10.1200/JCO.19.03357

Thank you for considering this request. Below is my contact information should you need to contact me for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Giffin', with a horizontal line extending to the right.

Suzana Giffin, AVP
Global Medical Affairs
Merck & Co., Inc.
2000 Galloping Hill Rd
Kenilworth, NJ 07033
908-740-6708
suzana.giffin@merck.com