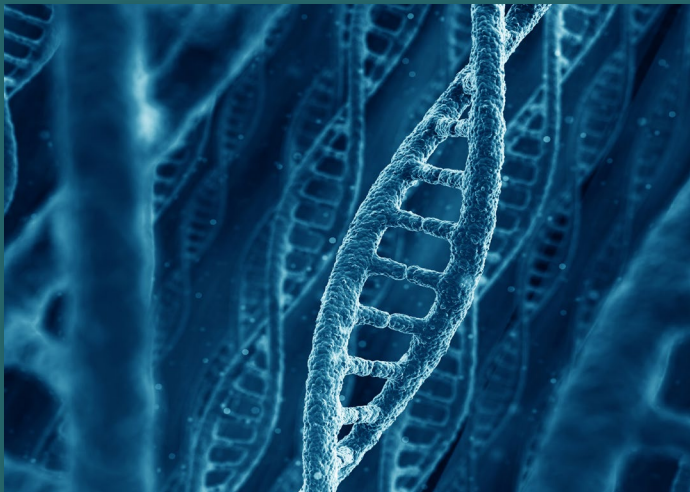


# Case Study Results

Shintaro Hagiwara, Ph.D.  
*Risk Sciences International*



*The views expressed in this presentation are those of the presenters and do not necessarily reflect the views or policies of the U.S. EPA*

# Outline

- Baseline analysis scenarios
  - Results for the BRDM
  - Results for the TRDM
- Sensitivity analysis scenarios
  - Effect of the quality of exposure information
  - Effect of the adverse health outcome and cost of control
  - Effect of the toxicity distribution
  - Effect of the affected population size
  - Effect of the target risk level
  - Discordance as a source of additional uncertainty
- Summary

# **BASELINE ANALYSIS FOR THE BENEFIT-RISK DECISION-MAKER (BRDM)**

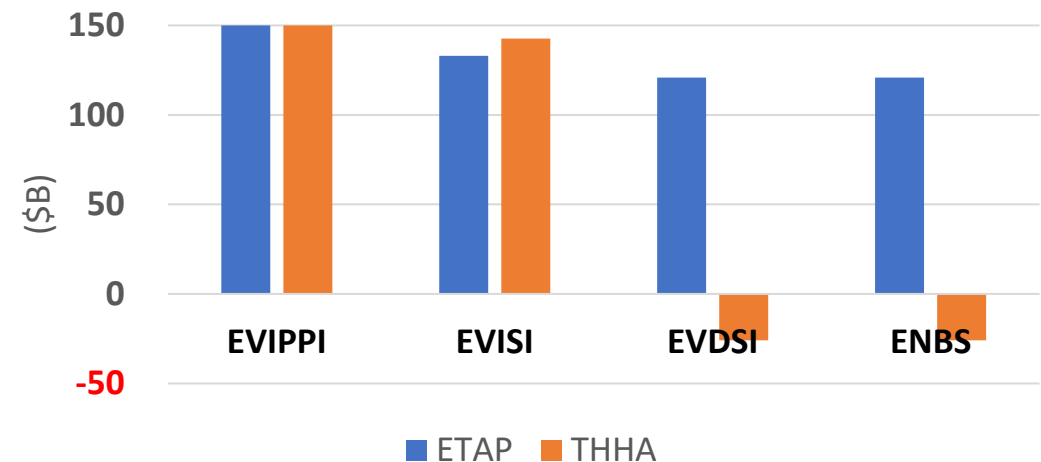
# Key VOI Metrics

Metric	Description
EVISI	The expected value of <u>immediate</u> sample information. This is a measure of the value of information if it could be received and <u>immediately</u> update the estimate of risk. [Larger EVISI values are preferred.]
COD	The cost of delay. This is a measure of the reduction in benefit associated with the <u>delay</u> in the decision-making process. [Smaller COD values are preferred.]
$EVDSI = EVISI - COD$	The expected value of <u>delayed</u> sample information. This is a measure of the value of the information which combines the quality of the information and the <u>delay</u> associated with it. [Larger EVDSI values are preferred.]
COT	The cost of testing and assessment process. [Smaller COT values are preferred.]
$ENBS = EVDSI - COT$	The expected net benefit of sampling. This is a measure of the value of the information taking into account the cost of acquiring the information, in addition to its quality and delay properties. The ENBS measures the benefit accrued <u>per testing</u> . [Larger ENBS values are preferred.]
$ROI = ENBS / COT$	The return on investment. This is a measure of the value of the information expressed as the ratio of the benefit accrued <u>per dollar expended</u> . [Larger ROI values are preferred.]

# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

ORE (%)	78	
EV CI (\$B)	293	
EVIPPI (\$B)	154	
	ETAP	THHA
EVISI (\$B)	133	143
COD (\$B)	12	169
EVDSI (\$B)	121	-26
ENBS (\$B)	121	-26
ROI	603,877	-6,478

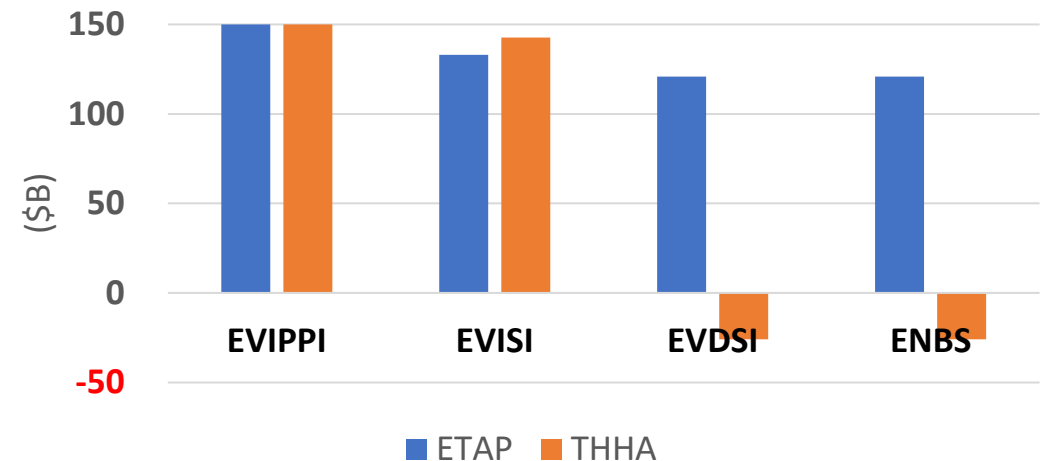


# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

- Minimized ETSC over the 20-year time horizon w/o collecting additional information (EV|CI) = \$293 B

ORE (%)	78	
EV CI (\$B)	293	
EVIPPI (\$B)	154	
	ETAP	THHA
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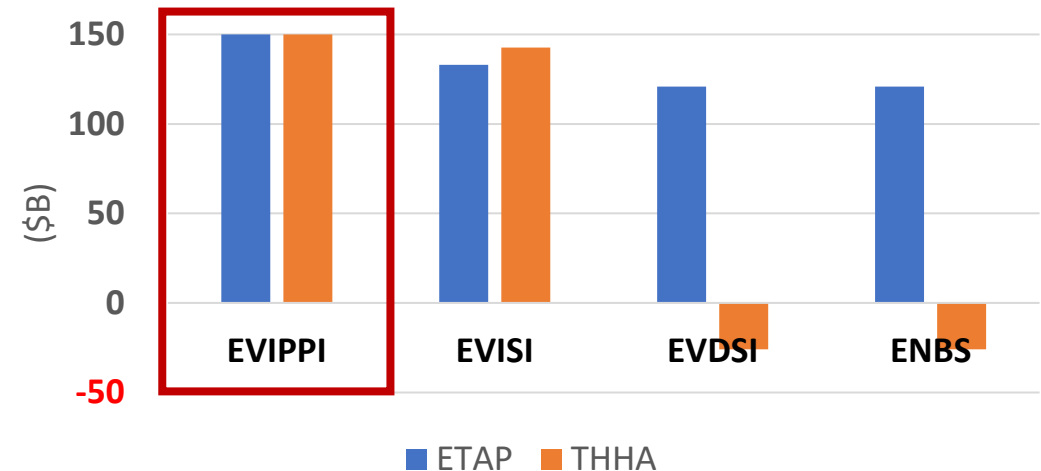


# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

- Minimized ETSC over the 20-year time horizon w/o collecting additional information (EV|CI) = **\$293 B**
- Eliminating uncertainty in  $\mu_{tox}$  will result in a reduction of **\$154 B** in ETSC

ORE (%)	78	
EV CI (\$B)	293	
EVIPPI (\$B)	154	
	ETAP	THHA
EVISI (\$B)	133	143
COD (\$B)	12	169
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ROI	603,877	-6,478

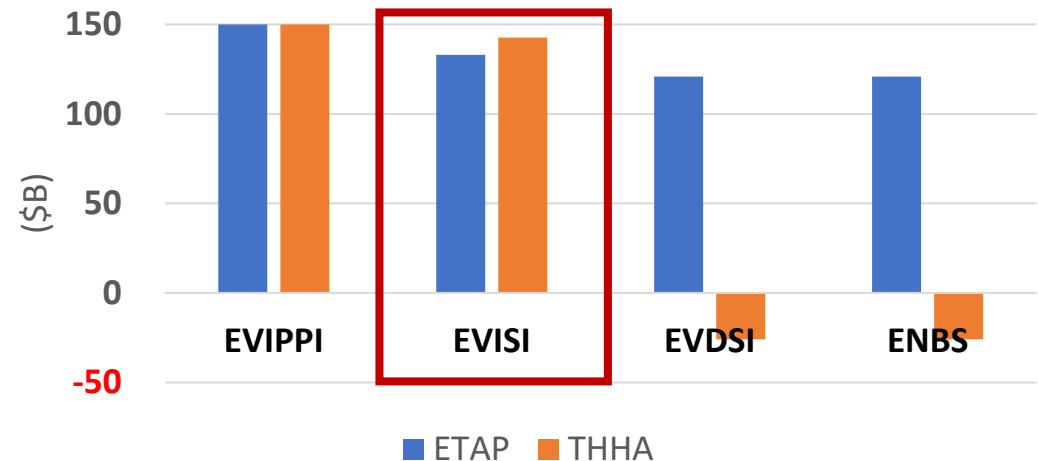


# Scenario 5

## (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

- Minimized ETSC over the 20-year time horizon w/o collecting additional information (EV|CI) = **\$293 B**
- Eliminating uncertainty in  $\mu_{\text{tox}}$  will result in a reduction of **\$154 B** in ETSC
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EV CI (\$B)	293	
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	ETAP	THHA
EVISI (\$B)	133	143
COD (\$B)	12	169
EVDSI (\$B)	121	-26
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ROI	603,877	-6,478



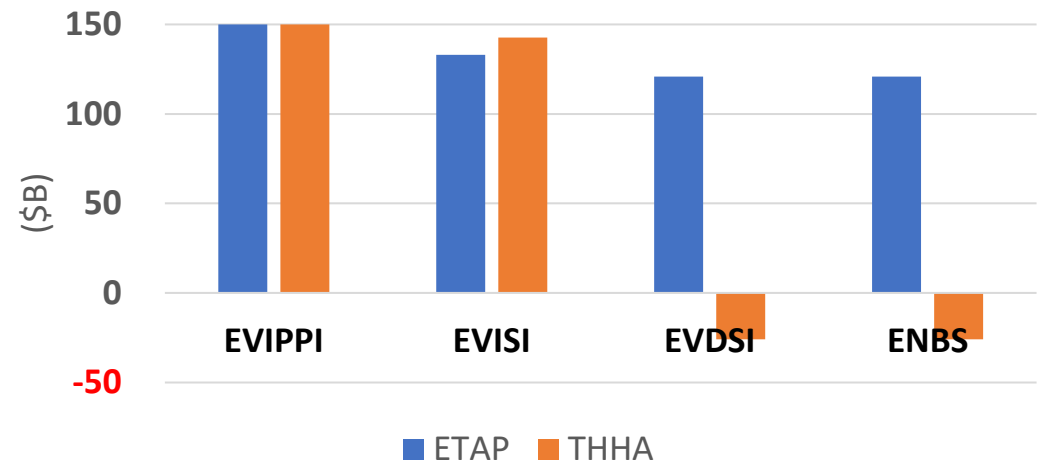


# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

- Minimized ETSC over the 20-year time horizon w/o collecting additional information (EV|CI) = **\$293 B**
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- ETAP (w/o delay) reduces ETSC by **\$133 B**
- THHA (w/o delay) reduces ETSC by **\$143 B**
- The COD for ETAP (6-months) is **\$12 B**
- The COD for THHA (8-year) is **\$169 B**

ORE (%)	78	
EV CI (\$B)	293	
EVIPPI (\$B)	154	
	ETAP	THHA
EVISI (\$B)	133	143
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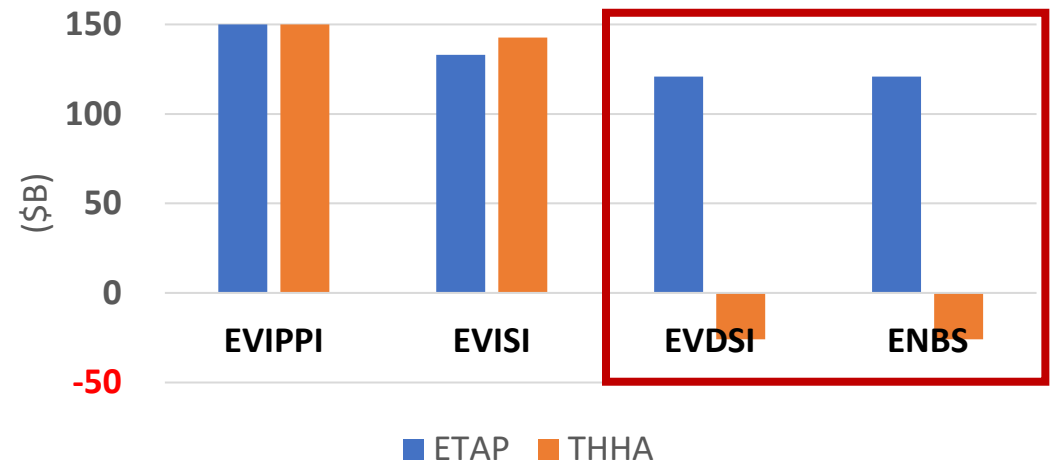


# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

- Minimized ETSC over the 20-year time horizon w/o collecting additional information (EV|CI) = **\$293 B**
- Eliminating uncertainty in  $\mu_{tox}$  will result in a reduction of **\$154 B** in ETSC
- ETAP (w/o delay) reduces ETSC by **\$133 B**
- THHA (w/o delay) reduces ETSC by **\$143 B**
- The COD for ETAP (6-months) is **\$12 B**
- The COD for THHA (8-year) is **\$169 B**
- The EVDSI and ENBS for ETAP is positive at **\$121 B**
- The EVDSI and ENBS for THHA is negative at **-\$26 B**

ORE (%)	78	
EV CI (\$B)	293	
EVIPPI (\$B)	154	
	ETAP	THHA
EVISI (\$B)	133	143
COD (\$B)	12	169
EVDSI (\$B)	121	-26
ENBS (\$B)	121	-26
ROI	603,877	-6,478

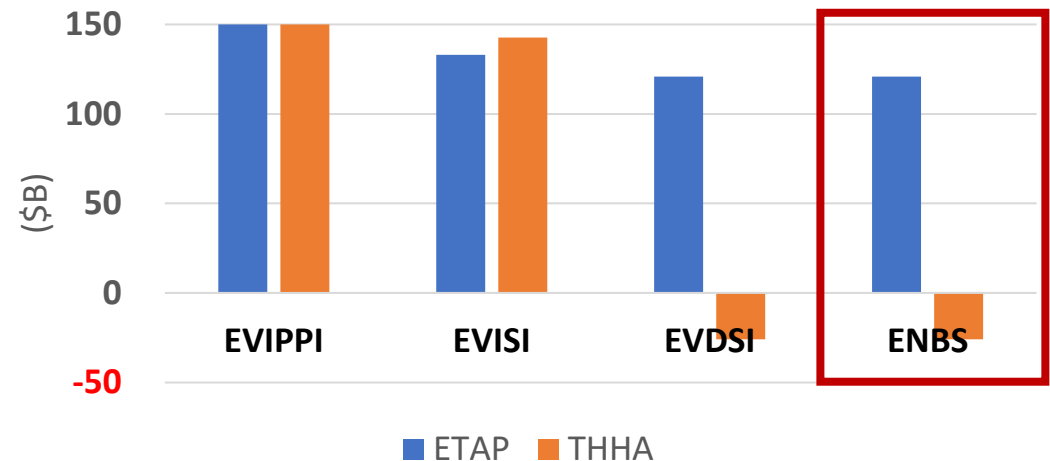


# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

- Minimized ETSC over the 20-year time horizon w/o collecting additional information (EV|CI) = **\$293 B**
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- The COD for ETAP (6-months) is **\$12 B**
- The COD for THHA (8-year) is **\$169 B**
- The EVDSI and ENBS for ETAP is positive at **\$121 B**
- The EVDSI and ENBS for THHA is negative at **-\$26 B**
- **ETAP provides positive VOI** when the COD and COT are taken into account

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EV CI (\$B)	293	
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	ETAP	THHA
EVISI (\$B)	133	143
COD (\$B)	12	169
EVDSI (\$B)	121	-26
ENBS (\$B)	121	-26
ROI	603,877	-6,478



High  
 ↑ Median Exposure Level ( $\mu_{exp}$ )  
 ↓ Low



Low ← Variability in Exposure ( $\sigma_{exp}$ ) → High

High  
 ↑ Median Exposure Level ( $\mu_{exp}$ )  
 ↓ Low



Low ← Variability in Exposure ( $\sigma_{exp}$ ) → High

High  
 ↑ Median Exposure Level ( $\mu_{exp}$ )  
 ↓ Low



Low ← Variability in Exposure ( $\sigma_{exp}$ ) → High

# Summary

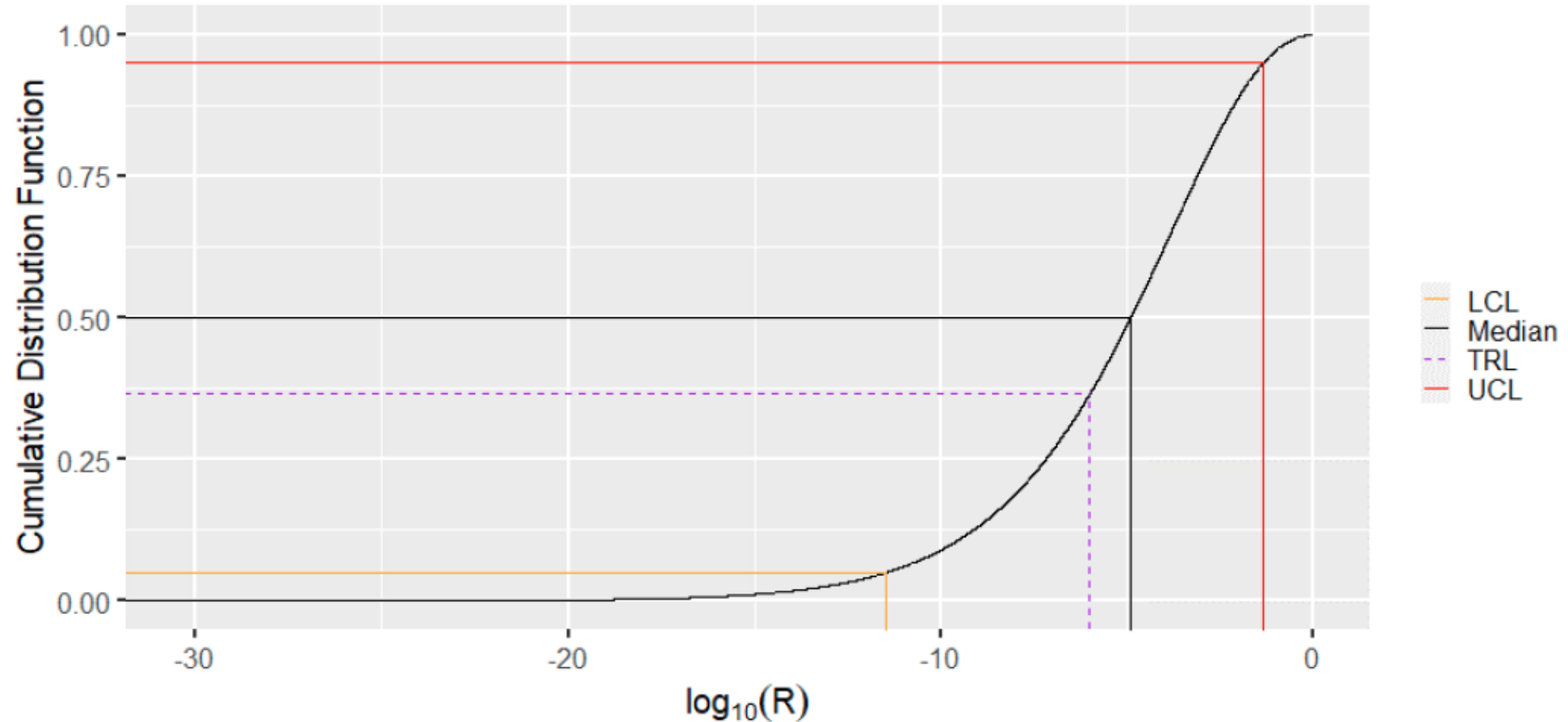
## (BRDM – Baseline Scenarios)

- In 8 out of 9 baseline scenarios, ETAP produced greater delay-adjusted VOI values (EVDSI, ENBS, and ROI) than THHA
- Scenario 9 (high  $\mu_{\text{exp}}$  and high  $\sigma_{\text{exp}}$ ) led to negative delay-adjusted VOI metrics for both ETAP and THHA due to potentially high prior risk
- A change in  $\mu_{\text{exp}}$  has a greater impact on resulting VOI metrics than a change in  $\sigma_{\text{exp}}$

# **BASELINE ANALYSIS FOR THE TARGET-RISK DECISION-MAKER (TRDM)**



# Scenario 5 (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

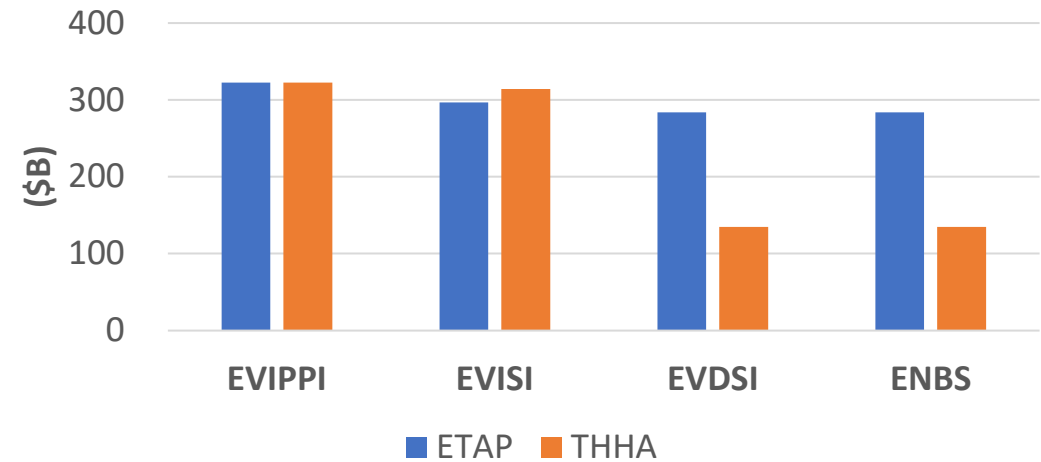


$q_{05} \leq TRL \leq q_{95}$  and therefore the TRDM require additional toxicity testing information

# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

EV CI (\$B)	446	
EVIPPI (\$B)	323	
	ETAP	THHA
EVISI (\$B)	297	314
COD (\$B)	13	180
EVDSI (\$B)	284	135
ENBS (\$B)	284	135
ROI	1,420,115	33,678

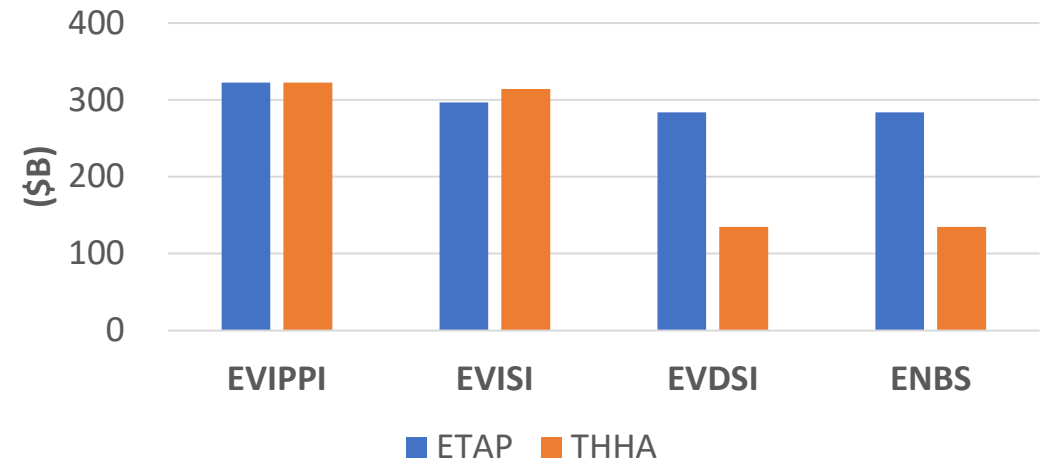


# Scenario 5

## (Medium $\mu_{exp}$ and Medium $\sigma_{exp}$ )

- ETHC over the 20-year time horizon w/o collecting additional information (EV | CI) = **\$446 B**

<b>EV   CI (\$B)</b>	446	
<b>EVIPPI (\$B)</b>	323	
	<b>ETAP</b>	<b>THHA</b>
<b>EVISI (\$B)</b>	297	314
<b>COD (\$B)</b>	13	180
<b>EVDSI (\$B)</b>	284	135
<b>ENBS (\$B)</b>	284	135
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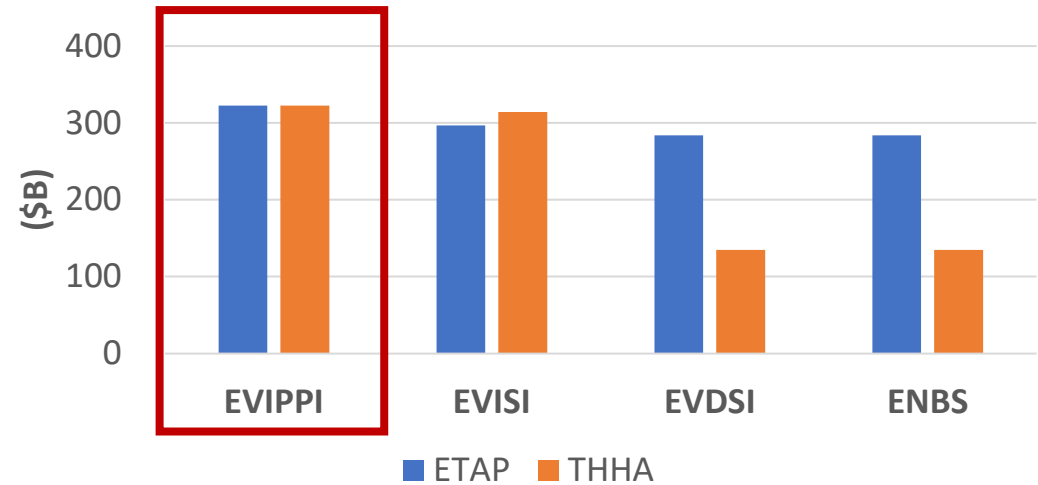


# Scenario 5

## (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

- ETHC over the 20-year time horizon w/o collecting additional information (EV | CI) = **\$446 B**
- Eliminating uncertainty in  $\mu_{\text{tox}}$  will result in reduction of **\$323 B** in ETSC

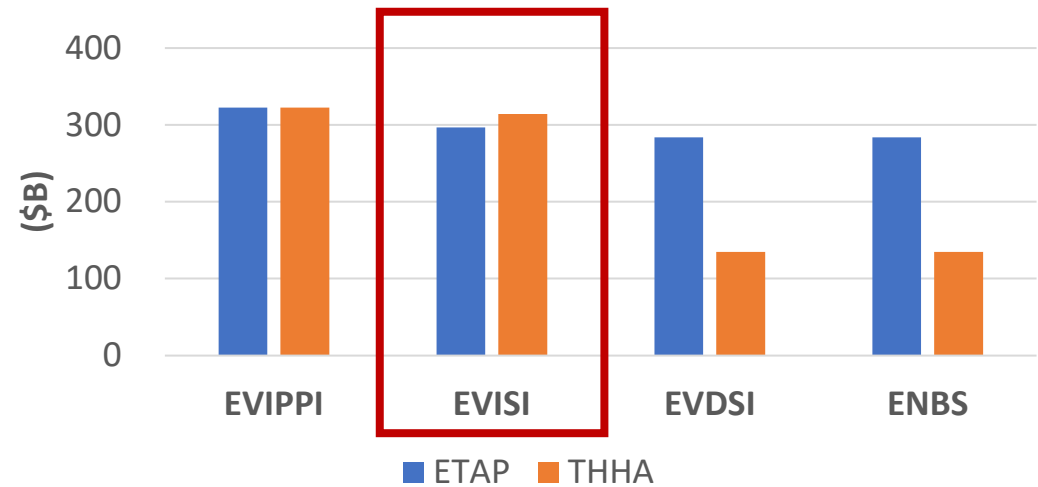
EV   CI (\$B)	446	
EVIPPI (\$B)	323	
	ETAP	THHA
EVISI (\$B)	297	314
COD (\$B)	13	180
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# Scenario 5 (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

- ETHC over the 20-year time horizon w/o collecting additional information (EV | CI) = **\$446 B**
- Eliminating uncertainty in  $\mu_{\text{tox}}$  will result in reduction of **\$323 B** in ETSC
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- THHA (w/o delay) reduces ETSC by **\$314 B**

EV   CI (\$B)	446	
EVIPPI (\$B)	323	
	ETAP	THHA
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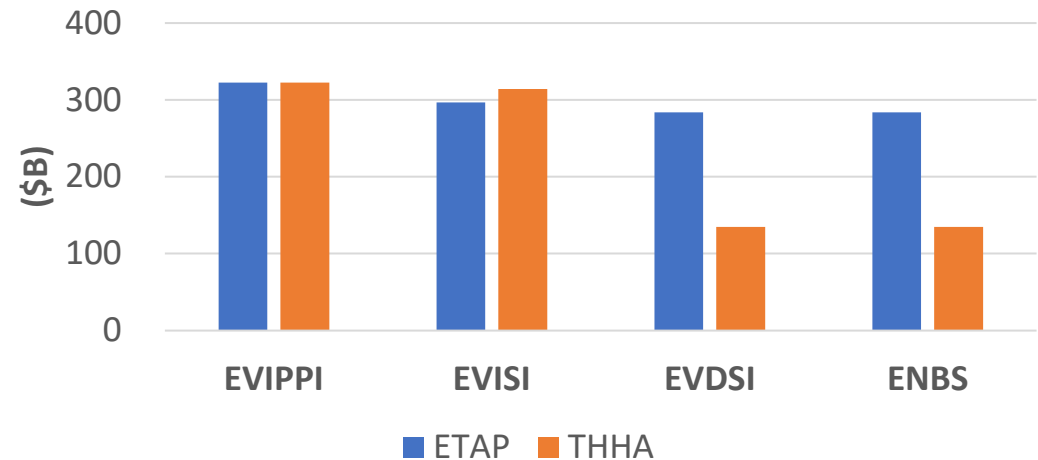


# Scenario 5

## (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

- ETHC over the 20-year time horizon w/o collecting additional information (EV | CI) = **\$446 B**
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- THHA (w/o delay) reduces ETSC by **\$314 B**
- COD for ETAP (6-months) is **\$13 B**
- COD for THHA (8-year) is **\$180 B**

EV   CI (\$B)	446	
EVIPPI (\$B)	323	
	ETAP	THHA
EVISI (\$B)	297	314
<b>COD (\$B)</b>	<b>13</b>	<b>180</b>
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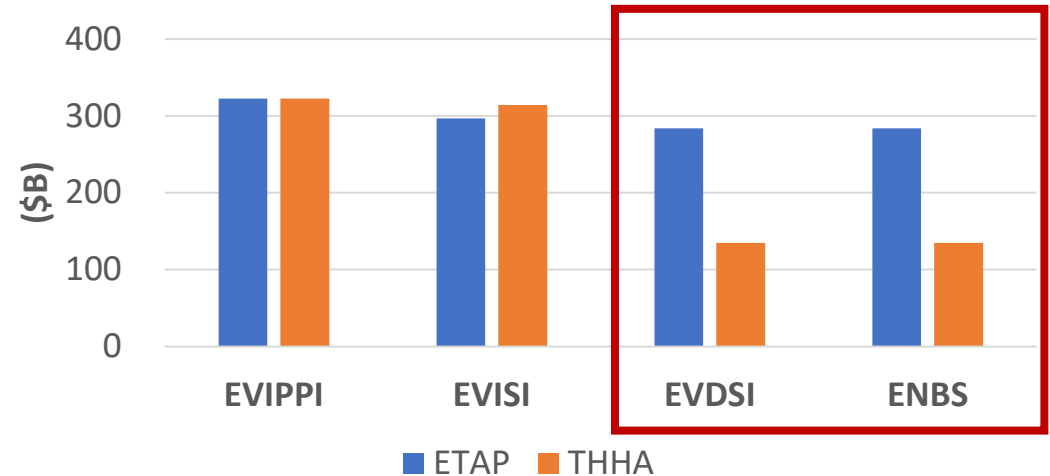


# Scenario 5

## (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

- ETHC over the 20-year time horizon w/o collecting additional information (EV | CI) = **\$446 B**
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- ETAP (w/o delay) reduces ETSC by **\$297 B**
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- COD for ETAP (6-months) is **\$13 B**
- COD for THHA (8-year) is **\$180 B**
- EVDSI and ENBS for ETAP is **\$284 B**
- EVDSI and ENBS for THHA is **\$135 B**

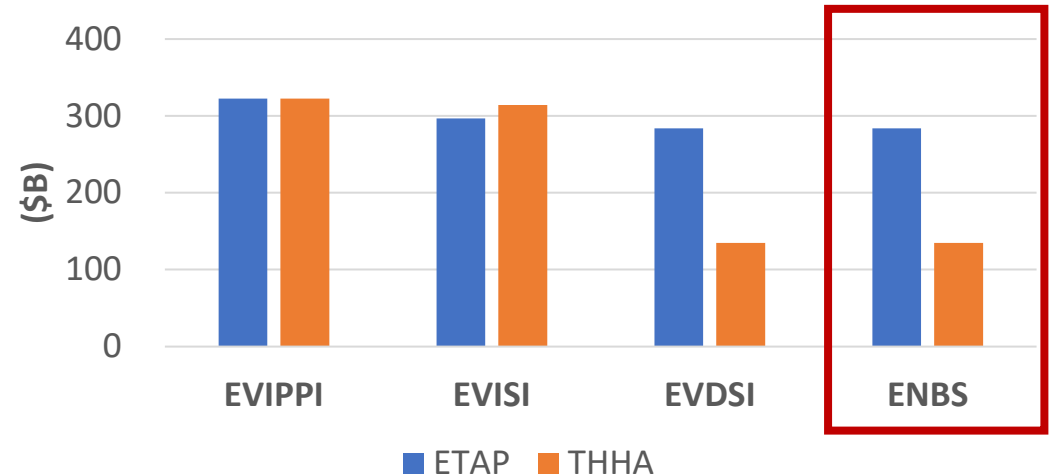
EV   CI (\$B)	446	
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	ETAP	THHA
EVISI (\$B)	297	314
COD (\$B)	13	180
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ENBS (\$B)	284	135
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# Scenario 5 (Medium $\mu_{\text{exp}}$ and Medium $\sigma_{\text{exp}}$ )

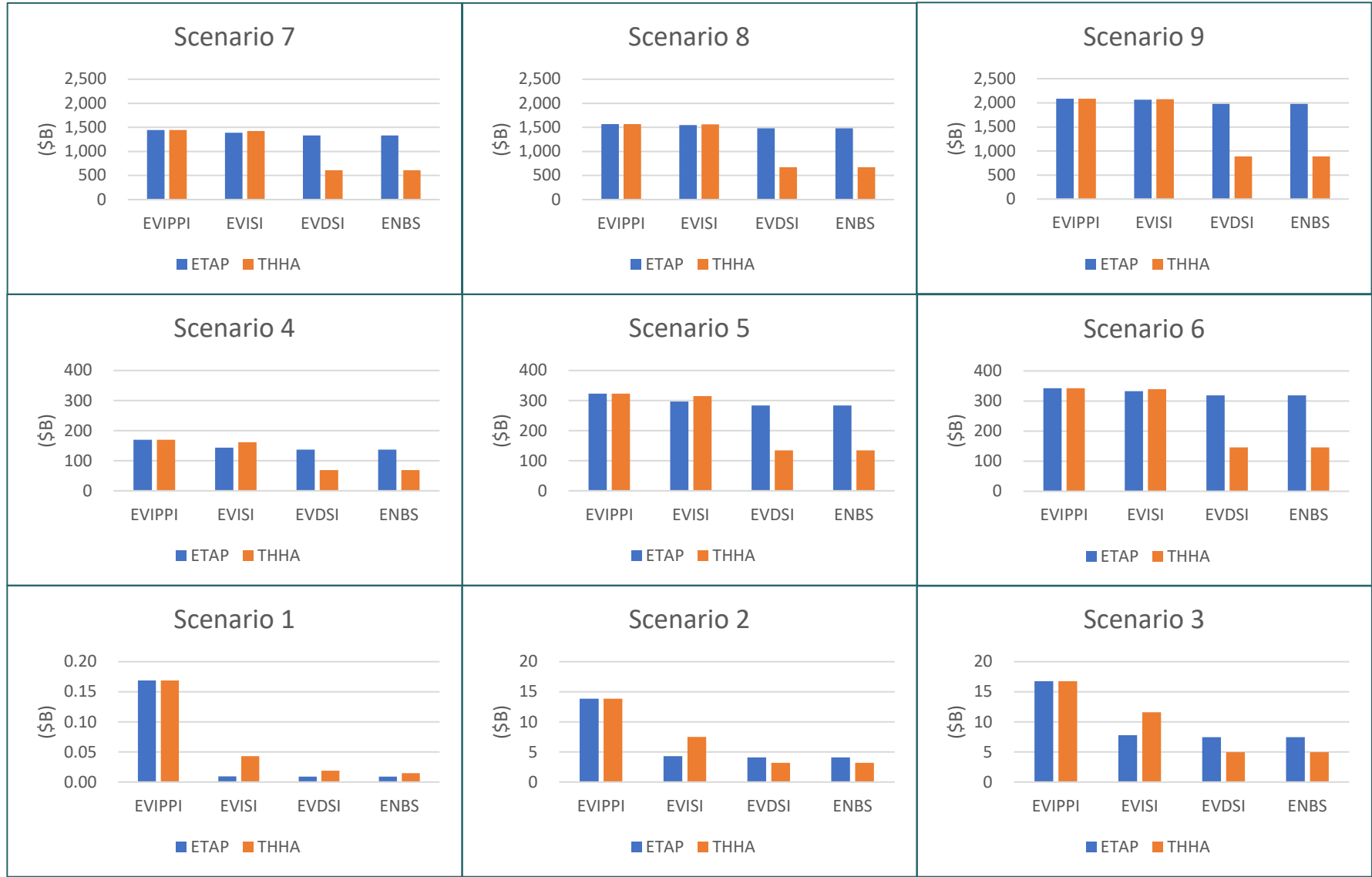
- ETHC over the 20-year time horizon w/o collecting additional information (EV | CI) = **\$446 B**
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- EVDSI and ENBS for ETAP is **\$284 B**
- EVDSI and ENBS for THHA is **\$135 B**
- **ETAP provides greater VOI values** when COD and COT are taken into account

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	ETAP	THHA
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High  
 ↑ Median Exposure Level ( $\mu_{exp}$ )  
 ↓ Low



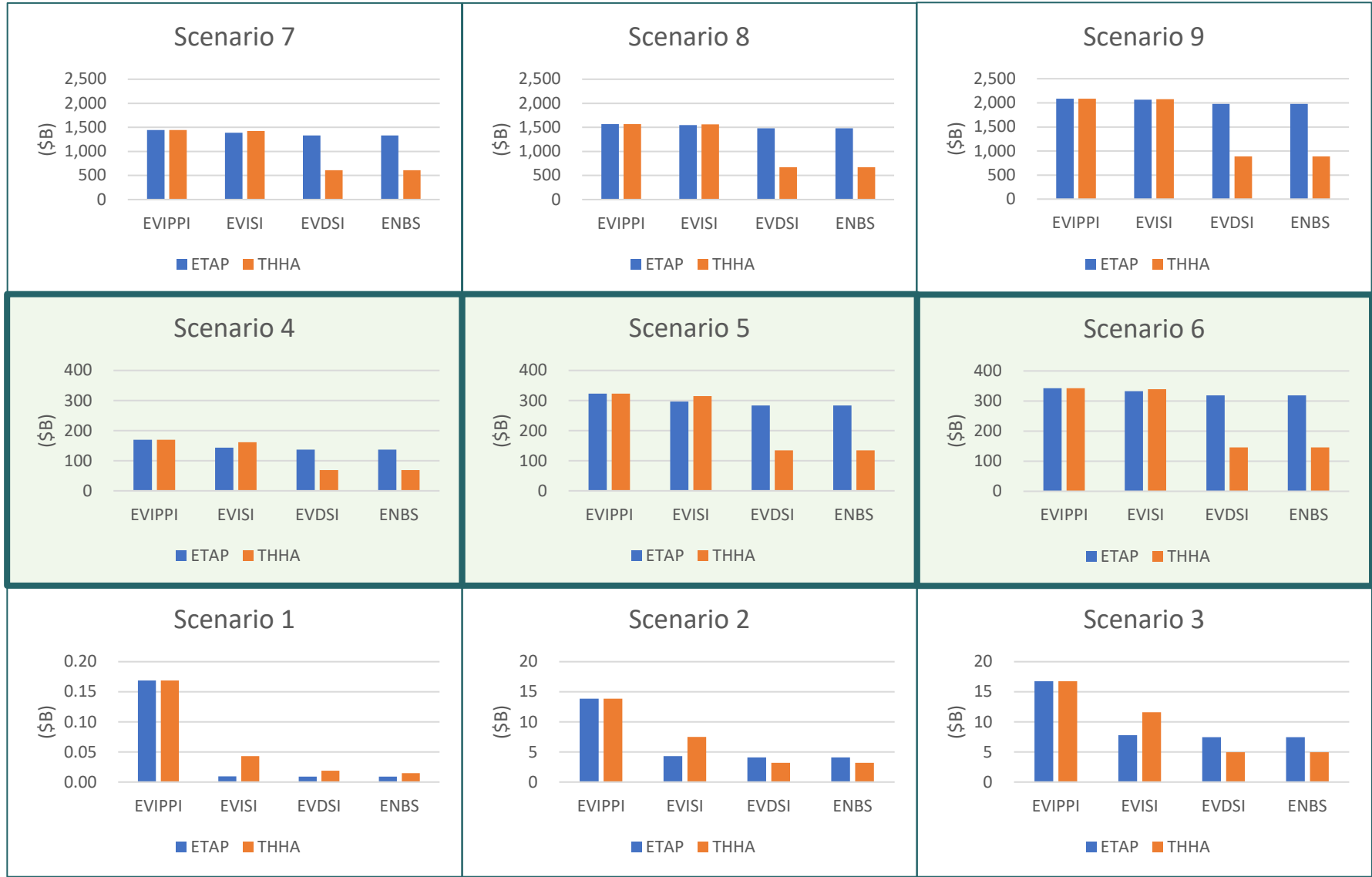
Low ← Variability in Exposure ( $\sigma_{exp}$ ) → High

High  
 ↑ Median Exposure Level ( $\mu_{exp}$ )  
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High  
 ↑ Median Exposure Level ( $\mu_{exp}$ )  
 ↓ Low



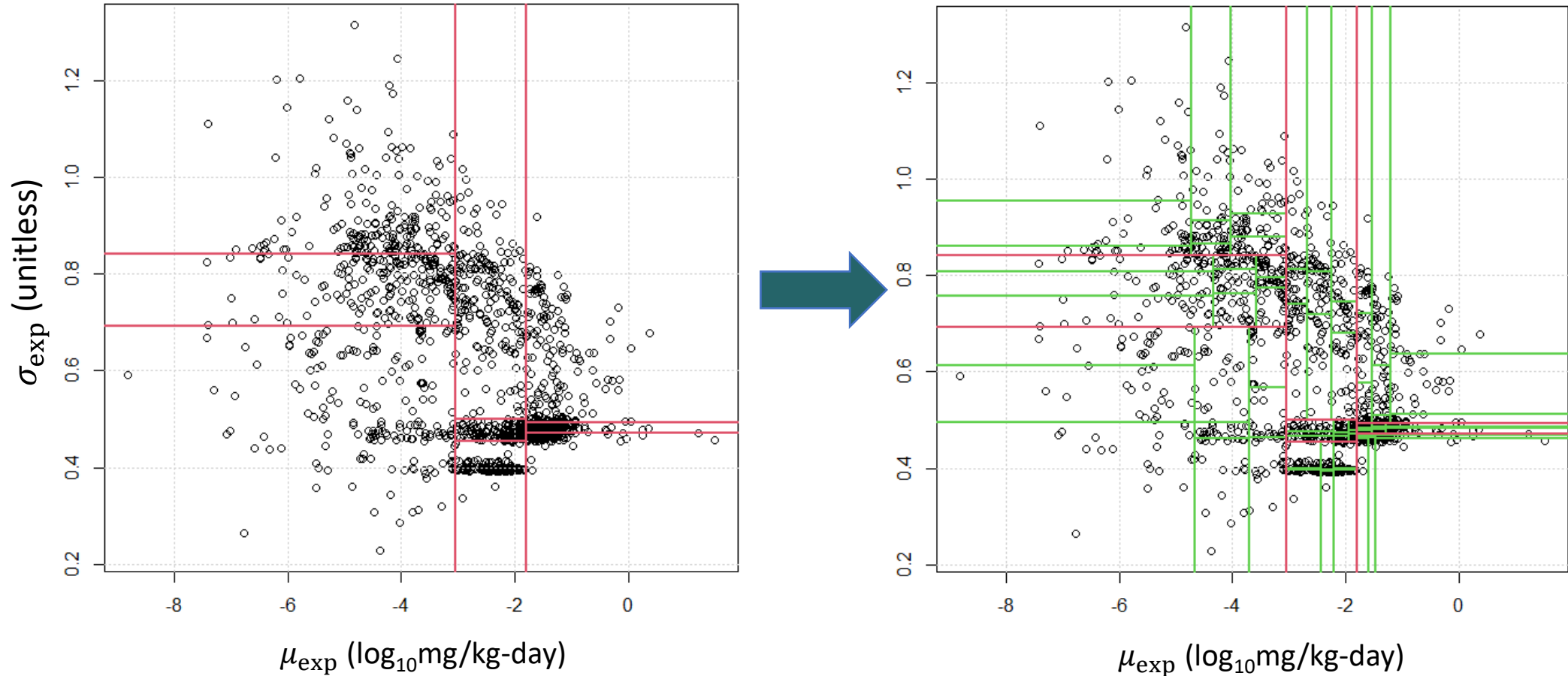
Low ← Variability in Exposure ( $\sigma_{exp}$ ) → High

# Summary (TRDM – Baseline Scenarios)

- In scenarios 2 – 9, delay-adjusted VOI metrics prefer ETAP over THHA
- In scenario 1, the EVDSI and ENBS metrics prefer THHA
- A change in  $\mu_{\text{exp}}$  has a greater impact on resulting VOI metrics than a change in  $\sigma_{\text{exp}}$

# **SENSITIVITY ANALYSIS SCENARIOS**

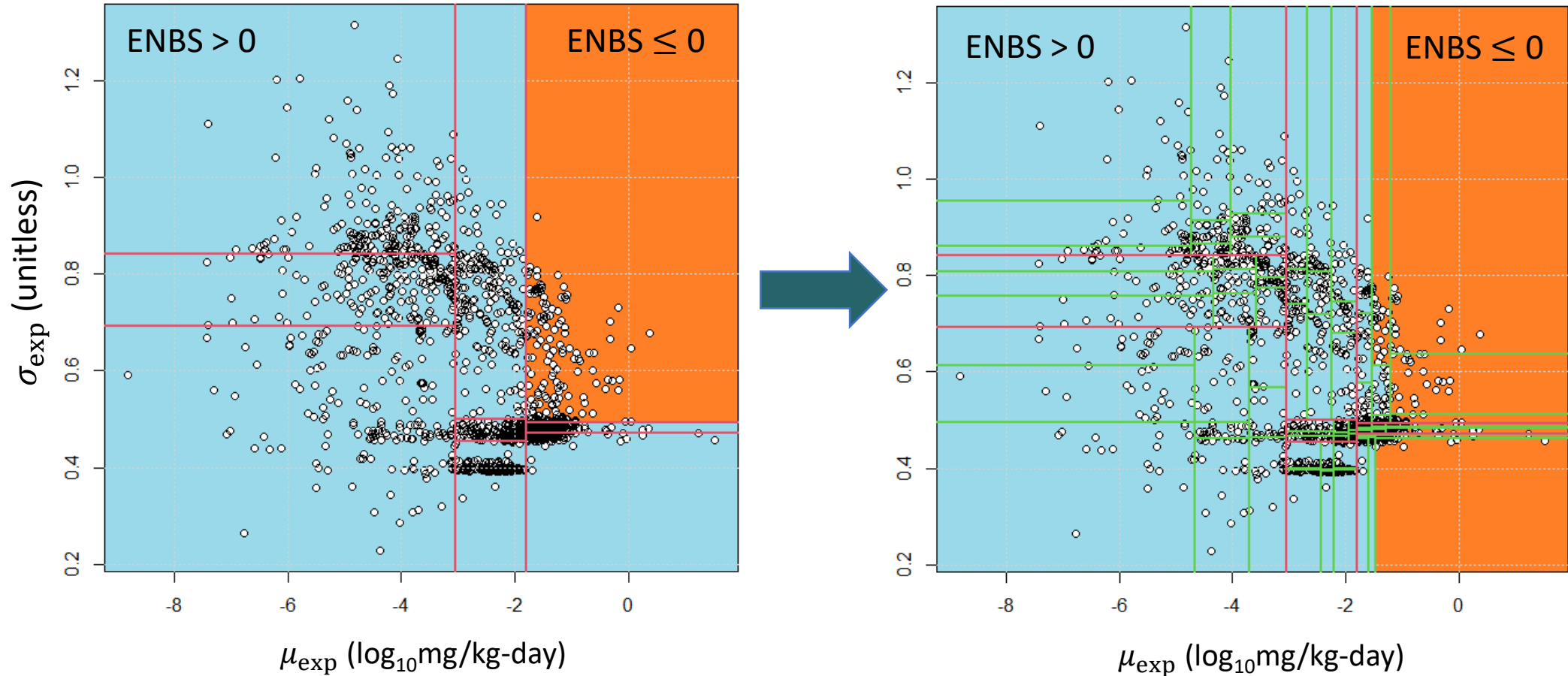
# SA1. Effect of the Quality of Exposure Information



*Each of the 9 exposure domains are further partitioned into  $3 \times 3$  sub-domains*



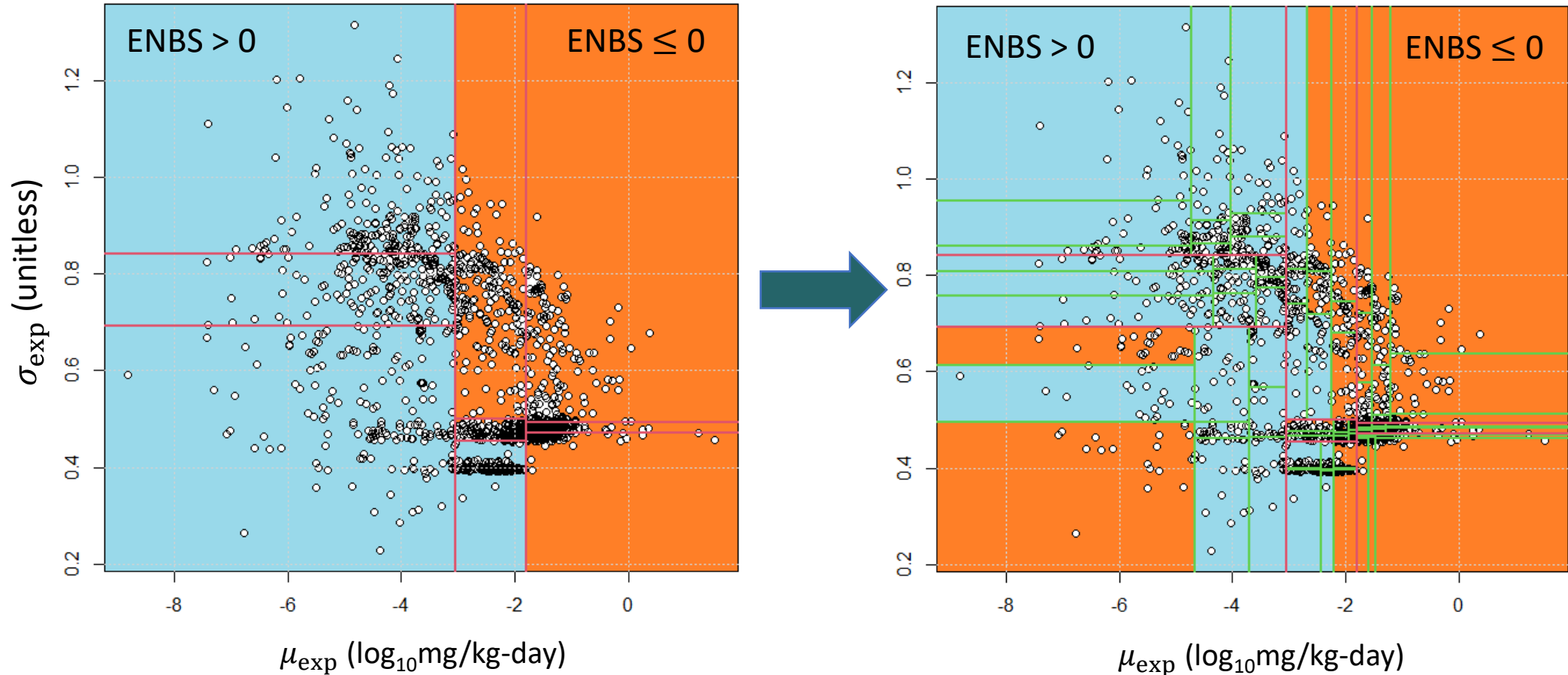
# SA1. Effect of the Quality of Exposure Information (ETAP)



*Median exposure ( $\mu_{\text{exp}}$ ) has a greater impact on the ENBS than variation in exposure ( $\sigma_{\text{exp}}$ ) for the BRDM*



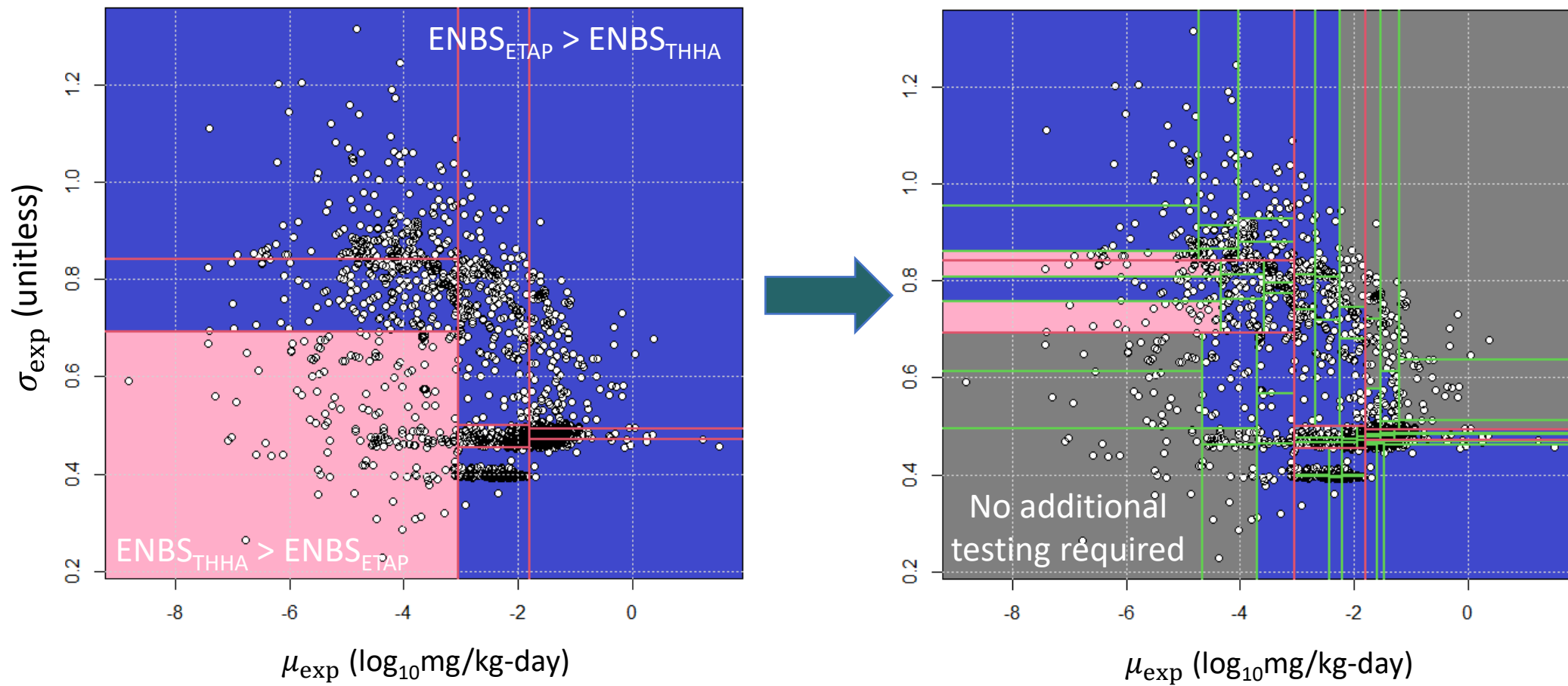
# SA1. Effect of the Quality of Exposure Information (THHA)



*Similar results are observed for THHA, although some negative ENBS values are seen for  $\mu_{\text{exp}}$  and  $\sigma_{\text{exp}}$*



# SA1. Effect of the Quality of Exposure Information



*More precise exposure information may lead to regulatory decisions without additional toxicity testing*

# SA1. Effect of the Quality of Exposure Information

## For the BRDM

- ETAP is preferred over THHA in all scenarios, when compared using EVDSI and ENBS

## For the TRDM

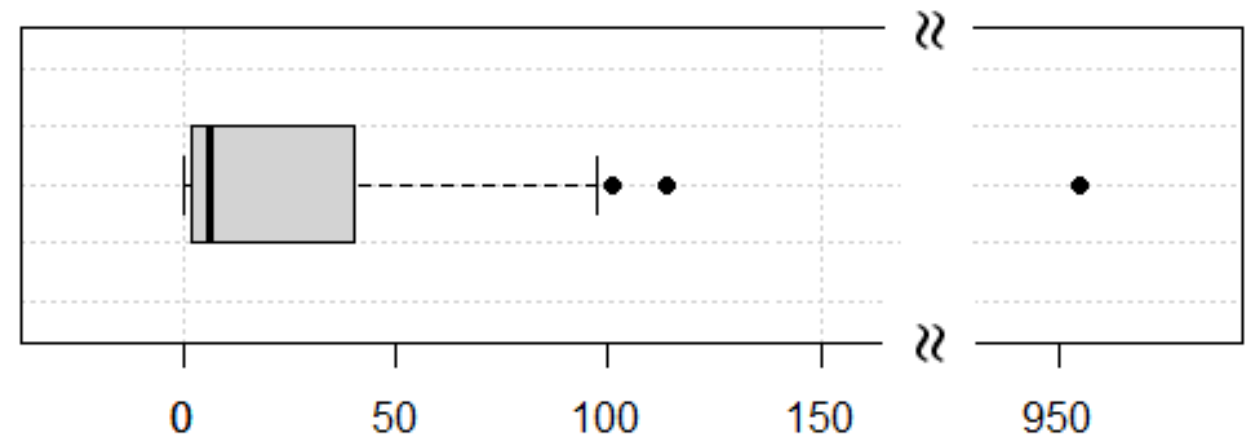
- More precise exposure information can lead to regulatory decisions without additional toxicity testing in certain cases
- There are 2 scenarios where the ENBS metric prefers THHA, but the ROI metric always prefers ETAP

# SA2.1. Effect of the Adverse Health Outcome Cost

- VOI analyses can be conducted for acute, chronic, and fatal outcomes, each of which will have a different economic valuation
- In addition to a notional value of **\$10,000 per year** for a chronic adverse health outcome used in the baseline analysis, we use values of **\$1,000 per year** and **\$110,000 per year** as notional values for acute and fatal outcomes, respectively

## SA2.2. Effect of the Cost of Control

- A recent evaluation of the costs of chemical restriction proposals between January 2010 to May 2020 under REACH indicated an annualized total expenditure of €1.7 B across all the proposals (ECHA 2021)
- The mean and median control cost across all chemical control programs included in this program were €53.3 M and €6 M, respectively, corresponding to \$50.6 M and \$5.7 M, based on average 2022 exchange rates
- $ACC_{max}$  is set to **\$578 M** (compared to \$23.1 B in the baseline analysis)



Boxplot of annualized control cost associated with 33 risk management programs under the REACH registration (in €M).

[Based on ECHA (2021). Costs and benefits of REACH restrictions proposed between 2016-2020. ECHA-21-R-02-EN. Helsinki, Finland: European Chemicals Agency.]

# SA2 – Effect of the Adverse Health Outcome Cost and Cost of Control

Under scenario 5

## A. Benefit-risk Decision-making

ACC <sub>max</sub>	\$23.1B (baseline)						\$578M	
AHC	\$1K		\$10K (baseline)		\$110K		\$10K	
ORE	0		78		100		100	
EV CI (\$B)	45		293		1,276		101	
EVIPPI (\$B)	17		154		150		3	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	12	15	133	143	112	129	2	3
CoD (\$B)	1	8	12	169	159	2,147	15	199
EVDSI (\$B)	12	6	121	-26	-48	-2,017	-13	-196
ENBS (\$B)	12	6	121	-26	-48	-2,017	-13	-196
ROI	59	2	604	-6	-238	-504	-63	-49

## B. Target-risk Decision-making

AHC	\$1K		\$10K (baseline)		\$110K	
EV CI (\$B)	45		446		4,903	
EVIPPI (\$B)	32		323		3,549	
	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	30	31	297	314	3,263	3,458
CoD (\$B)	1	18	13	180	139	1,976
EVDSI (\$B)	28	13	284	135	3,124	1,482
ENBS (\$B)	28	13	284	135	3,124	1,482
ROI	142	3	1,420	34	15,621	370

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric).

\$B, Billions of U.S. dollars; \$M, Millions of U.S. dollars; \$K, Thousands of U.S. dollars.

# SA2 – Effect of the Adverse Health Outcome Cost and Cost of Control

## A. Benefit-risk Decision-making

ACC <sub>max</sub>	\$23.1B (baseline)						\$578M	
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ENBS (\$B)	12	6	121	-26	-48	-2,017	-13	-196
ROI	59	2	604	-6	-238	-504	-63	-49

## Under scenario 5

### For the BRDM

- AHC = \$1K leads to positive delay-adjusted VOI values for THHA

## B. Target-risk Decision-making

AHC	\$1K		\$10K (baseline)		\$110K	
EV CI (\$B)	45		446		4,903	
EVIPPI (\$B)	32		323		3,549	
	ETAP	THHA	ETAP	THHA	ETAP	THHA
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# SA2 – Effect of the Adverse Health Outcome Cost and Cost of Control

## A. Benefit-risk Decision-making

ACC <sub>max</sub>	\$23.1B (baseline)						\$578M	
AHC	\$1K		\$10K (baseline)		\$110K		\$10K	
ORE	0		78		100		100	
EV CI (\$B)	45		293		1,276		101	
EVIPPI (\$B)	17		154		150		3	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	12	15	133	143	112	129	2	3
CoD (\$B)	1	8	12	169	159	2,147	15	199
EVDSI (\$B)	12	6	121	-26	-48	-2,017	-13	-196
ENBS (\$B)	12	6	121	-26	-48	-2,017	-13	-196
ROI	59	2	604	-6	-238	-504	-63	-49

## Under scenario 5

### For the BRDM

- AHC = \$1K leads to positive delay-adjusted VOI values for THHA
- AHC = \$110K leads to negative VOI values for both ETAP and THHA

## B. Target-risk Decision-making

AHC	\$1K		\$10K (baseline)		\$110K	
EV CI (\$B)	45		446		4,903	
EVIPPI (\$B)	32		323		3,549	
	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	30	31	297	314	3,263	3,458
CoD (\$B)	1	18	13	180	139	1,976
EVDSI (\$B)	28	13	284	135	3,124	1,482
ENBS (\$B)	28	13	284	135	3,124	1,482
ROI	142	3	1,420	34	15,621	370

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric).

\$B, Billions of U.S. dollars; \$M, Millions of U.S. dollars; \$K, Thousands of U.S. dollars.

# SA2 – Effect of the Adverse Health Outcome Cost and Cost of Control

## A. Benefit-risk Decision-making

ACC <sub>max</sub>	\$23.1B (baseline)						\$578M	
AHC	\$1K		\$10K (baseline)		\$110K		\$10K	
ORE	0		78		100		100	
EV CI (\$B)	45		293		1,276		101	
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## Under scenario 5

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- Reduced ACC<sub>max</sub> has similar effect to increased AHC

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## Under scenario 5

### For the BRDM

- AHC = \$1K leads to positive delay-adjusted VOI values for THHA
- AHC = \$110K leads to negative VOI values for both ETAP and THHA
- Reduced ACC<sub>max</sub> has similar effect to increased AHC

### For the TRDM

- A change in AHC results in a proportional change in VOI values

# SA2 – Effect of the Adverse Health Outcome Cost and Cost of Control

## A. Benefit-risk Decision-making

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## Under scenario 5

### For the BRDM

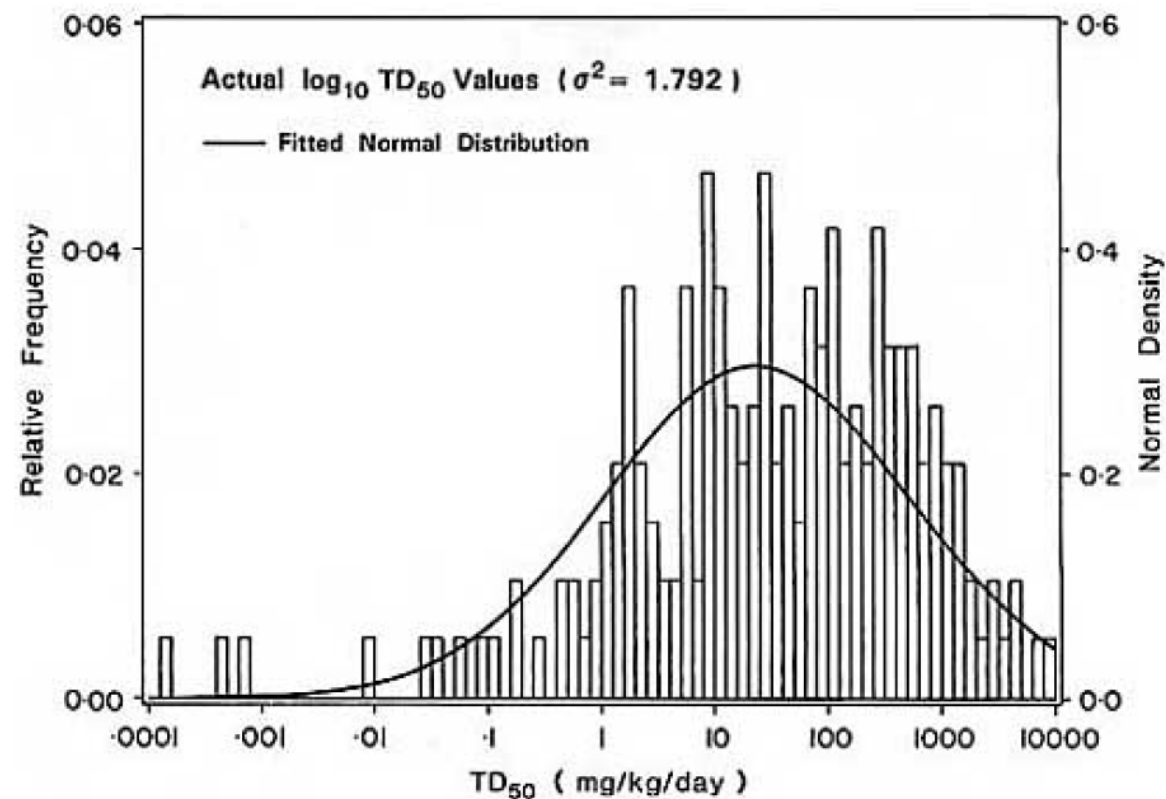
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- AHC = \$110K leads to negative VOI values for both ETAP and THHA
- Reduced ACC<sub>max</sub> has similar effect to increased AHC

### For the TRDM

- A change in AHC results in a proportional change in VOI values

*The ETAP is preferred over THHA in all cases using the ENBS metric*

# SA3 – Effect of the Toxicity Distribution



*The average  $HD_M^{50}$  across 191 carcinogens is approximately **5.0 mg/kg-day**  
(greater than **3.3 mg/kg-day** used in the baseline analysis)  
Valuation of **\$110,000 per year** is used for adverse health outcome*

$TD_{50}$ : Dose resulting in 50% tumor response

# SA3 – Effect of the Toxicity Distribution

## A. Benefit-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
ORE	27		61		48		86		98		100		100		100		100	
EV CI (\$B)	129		238		195		358		572		677		2,329		2,480		3,806	
EVIPPI (\$B)	66		116		93		175		180		136		113		118		59	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	56	61	101	108	81	87	156	166	152	165	107	120	74	92	77	96	32	44
CoD (\$B)	3	39	7	97	5	67	23	313	51	693	65	875	324	4,349	348	4,671	555	7,443
EVDSI (\$B)	54	22	94	11	76	20	133	-147	101	-528	42	-754	-249	-4,258	-270	-4,575	-522	-7,400
ENBS (\$B)	54	22	94	11	76	20	133	-147	101	-528	42	-754	-249	-4,258	-270	-4,575	-522	-7,400
ROI	268,774	5,456	469,678	2,631	381,306	5,081	666,416	-36,710	503,453	-132,048	212,002	-188,563	-1,247,370	-1,064,451	-1,350,566	-1,143,794	-2,612,345	-1,849,906

## B. Target-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
EV CI (\$B)	137		300		224		739		1,620		2,087		9,848		10,557		16,787	
EVIPPI (\$B)	0		34		47		545		1,187		1,472		6,928		7,514		11,375	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	0.01	0.04	7	15	15	28	407	491	993	1,126	1,360	1,429	6,389	6,733	7,266	7,430	11,062	11,257
CoD (\$B)	0.00	0.02	0	9	1	16	17	280	42	643	58	817	272	3,848	310	4,246	471	6,433
EVDSI (\$B)	0.01	0.02	6	7	15	12	390	210	951	482	1,302	612	6,116	2,885	6,957	3,184	10,591	4,824
ENBS (\$B)	0.01	0.01	6	7	15	12	390	210	951	482	1,302	612	6,116	2,885	6,957	3,184	10,591	4,824
ROI	25	3	31,761	1,630	72,820	3,038	1,950,546	52,562	4,754,909	120,575	6,512,120	153,093	30,582,137	721,341	34,782,567	795,971	52,952,843	1,205,927

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric).  
 \$B, Billions of U.S. dollars; \$M, Millions of U.S. dollars; \$K, Thousands of U.S. dollars.

*BRDM: The ETAP was preferred over THHA in all scenarios (EVDSI & ENBS)*

*BRDM: More scenarios produced negative delay-adjusted VOI values due to increased AHC valuation*

*TRDM: The ETAP was preferred in 7 scenarios using the ENBS metric*

# SA4 – Effect of the Affected Population Size

- Baseline analysis assumed 330M people were affected, representing the situation in which essentially 100% of the U.S. population is exposed to the chemical of interest
- Sensitivity analyses were performed with 165M (50%) and 33M (10%) people were exposed

M: Millions of people

# SA4 – Effect of the Affected Population Size

## A. Benefit-risk decision-making

Population size	330M (Baseline)		165M		33M	
ORE	78		49		0	
EV CI (\$B)	293		189		45	
EVIPPI (\$B)	154		106		17	
	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	133	143	91	98	12	15
CoD (\$B)	12	169	5	75	1	8
EVDSI (\$B)	121	-26	86	23	12	6
ENBS (\$B)	121	-26	86	23	12	6
ROI	603,877	-6,478	429,503	5,761	59,026	1,563

Under scenario 5

## B. Target-risk decision-making

Population size	330M (Baseline)		165M		33M	
EV CI (\$B)	446		223		45	
EVIPPI (\$B)	323		161		32	
	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	297	314	148	157	30	31
CoD (\$B)	13	180	6	90	1	18
EVDSI (\$B)	284	135	142	67	28	13
ENBS (\$B)	284	135	142	67	28	13
ROI	1,420,115	33,678	710,057	16,839	142,011	3,367

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric).

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## Under scenario 5

### For the BRDM

- A reduction in population size leads to a significant reduction in the COD

## B. Target-risk decision-making

Population size	330M (Baseline)		165M		33M	
EV CI (\$B)	446		223		45	
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## Under scenario 5

### For the BRDM

- A reduction in population size leads to a significant reduction in the COD

### For the TRDM

- A change in the population size results in a proportional change in VOI values



# SA4 – Effect of the Affected Population Size

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## Under scenario 5

### For the BRDM

- A reduction in population size leads to a significant reduction in the COD

### For the TRDM

- A change in the population size results in a proportional change in VOI values

*The ETAP is preferred over THHA in all scenarios using the delay-adjusted VOI metric*

# SA5 – Effect of the Target Risk Level

- In the baseline analysis, the TRDM is concerned about risks that exceed a TRL of  $10^{-6}$
- The TRL of  $10^{-4}$  is used in the sensitivity analysis, representing the estimated median residual risk associated with non-cancer exposure guideline values reviewed in Chiu et al. (2018)

# SA5 – Effect of the Target Risk Level

## A. VOI analysis results with TRL of $10^{-6}$ (Baseline)

$10^{-6}$

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
EV CI (\$B)	35		71		53		231		446		492		2,115		2,281		3,205	
EVIPPI (\$B)	0.2		14		17		170		323		342		1,443		1,566		2,086	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	0.01	0.04	4.3	7.5	7.8	11.6	143	162	297	314	332	339	1,389	1,425	1,545	1,561	2,067	2,078
CoD (\$B)	0.00	0.03	0.2	4.3	0.3	6.6	6	92	13	180	14	194	59	814	66	892	88	1,187
EVDSI (\$B)	0.01	0.02	4.1	3.2	7.5	5.0	137	69	284	135	318	145	1,330	611	1,479	669	1,979	890
ENBS (\$B)	0.01	0.02	4.1	3.2	7.5	5.0	137	69	284	135	318	145	1,330	611	1,479	669	1,979	890
ROI	44	4	20,556	801	37,362	1,240	685,100	17,308	1,420,115	33,678	1,590,540	36,319	6,650,803	152,671	7,394,078	167,194	9,895,810	222,597

## B. VOI analysis results with TRL of $10^{-4}$

$10^{-4}$

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
EV CI (\$B)	NA		71		53		231		446		492		2,115		2,281		3,205	
EVIPPI (\$B)	NA		2		3		156		304		317		1,382		1,545		2,035	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	NA	NA	0.2	0.6	0.5	1.2	85	125	199	255	252	288	1,114	1,267	1,359	1,477	1,840	1,945
CoD (\$B)	NA	NA	0.0	0.3	0.0	0.7	4	72	8	146	11	164	47	724	58	844	78	1,112
EVDSI (\$B)	NA	NA	0.2	0.3	0.5	0.5	82	54	191	109	241	123	1,067	543	1,301	633	1,761	834
ENBS (\$B)	NA	NA	0.2	0.3	0.5	0.5	82	54	191	109	241	123	1,067	543	1,301	633	1,761	834
ROI	NA	NA	991	65	2,385	129	407,931	13,412	954,215	27,329	1,206,013	30,800	5,332,748	135,748	6,503,564	158,274	8,806,044	208,416

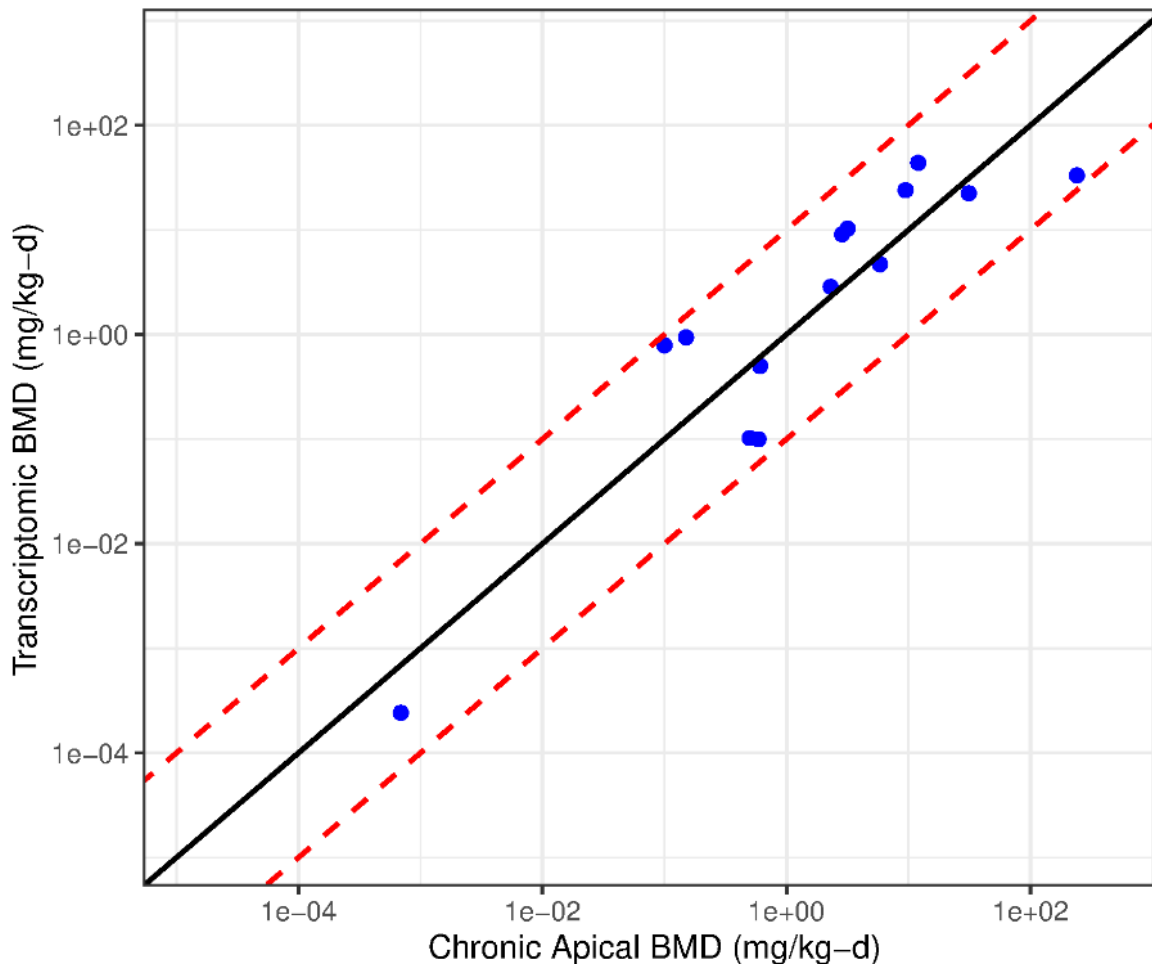
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*VOI results for TRL =  $10^{-4}$  in the sensitivity analysis show a similar pattern (ETAP is preferred over THHA) to those for TRL =  $10^{-6}$  in the baseline analysis*

# SA6 – Higher Residual Uncertainty in ETAP

- RMSD between 14 BMDs based on ETAP and traditional bioassay is 0.567
- Assigning all of this discordance as a source of uncertainty for the ETAP result leads to an increase in  $\sigma_{\text{ETAP}}$  to **0.741** (from 0.442)
- This constitutes a scenario in which ETAP is assumed to have higher residual uncertainty than baseline scenarios



# SA6 – Discordance as an Additional Source of Uncertainty

## A. Benefit-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
ORE	0		0		0		52		78		88		100		100		100	
EV CI (\$B)	35		71		53		187		293		326		683		718		915	
EV PI (\$B)	10		24		15		113		154		146		119		122		74	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	4	8	13	21	7	12	83	105	112	143	106	135	59	101	59	103	27	59
CoD (\$B)	0	5	1	12	0	7	5	85	11	169	12	172	64	876	69	952	99	1,342
EVDSI (\$B)	4	3	13	9	7	5	78	20	101	-26	94	-36	-5	-775	-10	-849	-72	-1,283
ENBS (\$B)	4	3	13	9	7	5	78	20	101	-26	94	-36	-5	-775	-10	-849	-72	-1,283
ROI	20,875	856	64,342	2,226	34,941	1,327	389,540	5,046	504,365	-6,478	471,870	-9,124	-23,700	-193,780	-49,121	-212,216	-357,880	-320,868

## B. Target-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
EV CI (\$B)	35		71		53		231		446		492		2,115		2,281		3,205	
EV PI (\$B)	0		14		17		170		323		342		1,443		1,566		2,086	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	0.00	0.04	0.8	7.5	2	12	85	162	227	314	307	339	1,257	1,425	1,466	1,561	2,014	2,078
CoD (\$B)	0.00	0.03	0.0	4.3	0	7	4	92	10	180	13	194	54	814	62	892	86	1,187
EVDSI (\$B)	0.00	0.02	1	3	2	5	82	69	217	135	294	145	1,204	611	1,403	669	1,928	890
ENBS (\$B)	0.00	0.02	1	3	2	5	82	69	217	135	294	145	1,204	611	1,403	669	1,928	890
ROI	-0.20	3.63	3,826	801	11,068	1,240	408,291	17,308	1,085,604	33,678	1,468,713	36,319	6,019,198	152,671	7,016,162	167,194	9,638,857	222,597

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric). \$B, Billions of U.S. dollars; \$M, Millions of U.S. dollars; \$K, Thousands of U.S. dollars.

# SA6 – Discordance as an Additional Source of Uncertainty

## A. Benefit-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
ORE	0		0		0		52		78		88		100		100		100	
EV CI (\$B)	35		71		53		187		293		326		683		718		915	
EV PI (\$B)	10		24		15		113		154		146		119		122		74	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	4	8	13	21	7	12	83	105	112	143	106	135	59	101	59	103	27	59
CoD (\$B)	0	5	1	12	0	7	5	85	11	169	12	172	64	876	69	952	99	1,342
EVDSI (\$B)	4	3	13	9	7	5	78	20	101	-26	94	-36	-5	-775	-10	-849	-72	-1,283
ENBS (\$B)	4	3	13	9	7	5	78	20	101	-26	94	-36	-5	-775	-10	-849	-72	-1,283
ROI	20,875	856	64,342	2,226	34,941	1,327	389,540	5,046	504,365	-6,478	471,870	-9,124	-23,700	-193,780	-49,121	-212,216	-357,880	-320,868

## B. Target-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
EV CI (\$B)	35		71		53		231		446		492		2,115		2,281		3,205	
EV PI (\$B)	0		14		17		170		323		342		1,443		1,566		2,086	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	0.00	0.04	0.8	7.5	2	12	85	162	227	314	307	339	1,257	1,425	1,466	1,561	2,014	2,078
CoD (\$B)	0.00	0.03	0.0	4.3	0	7	4	92	10	180	13	194	54	814	62	892	86	1,187
EVDSI (\$B)	0.00	0.02	1	3	2	5	82	69	217	135	294	145	1,204	611	1,403	669	1,928	890
ENBS (\$B)	0.00	0.02	1	3	2	5	82	69	217	135	294	145	1,204	611	1,403	669	1,928	890
ROI	-0.20	3.63	3,826	801	11,068	1,240	408,291	17,308	1,085,604	33,678	1,468,713	36,319	6,019,198	152,671	7,016,162	167,194	9,638,857	222,597

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric). \$B, Billions of U.S. dollars; \$M, Millions of U.S. dollars; \$K, Thousands of U.S. dollars.

*BRDM: The ETAP is still preferred over THHA in all scenarios (EVDSI & ENBS)*

# SA6 – Discordance as an Additional Source of Uncertainty

## A. Benefit-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
ORE	0		0		0		52		78		88		100		100		100	
EV CI (\$B)	35		71		53		187		293		326		683		718		915	
EVIPPI (\$B)	10		24		15		113		154		146		119		122		74	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	4	8	13	21	7	12	83	105	112	143	106	135	59	101	59	103	27	59
CoD (\$B)	0	5	1	12	0	7	5	85	11	169	12	172	64	876	69	952	99	1,342
EVDSI (\$B)	4	3	13	9	7	5	78	20	101	-26	94	-36	-5	-775	-10	-849	-72	-1,283
ENBS (\$B)	4	3	13	9	7	5	78	20	101	-26	94	-36	-5	-775	-10	-849	-72	-1,283
ROI	20,875	856	64,342	2,226	34,941	1,327	389,540	5,046	504,365	-6,478	471,870	-9,124	-23,700	-193,780	-49,121	-212,216	-357,880	-320,868

## B. Target-risk decision-making

$\mu_{exp}$	Low						Medium						High					
$\sigma_{exp}$	Low		Medium		High		Low		Medium		High		Low		Medium		High	
Scenario	1		2		3		4		5		6		7		8		9	
EV CI (\$B)	35		71		53		231		446		492		2,115		2,281		3,205	
EVIPPI (\$B)	0		14		17		170		323		342		1,443		1,566		2,086	
	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA	ETAP	THHA
EVISI (\$B)	0.00	0.04	0.8	7.5	2	12	85	162	227	314	307	339	1,257	1,425	1,466	1,561	2,014	2,078
CoD (\$B)	0.00	0.03	0.0	4.3	0	7	4	92	10	180	13	194	54	814	62	892	86	1,187
EVDSI (\$B)	0.00	0.02	1	3	2	5	82	69	217	135	294	145	1,204	611	1,403	669	1,928	890
ENBS (\$B)	0.00	0.02	1	3	2	5	82	69	217	135	294	145	1,204	611	1,403	669	1,928	890
ROI	-0.20	3.63	3,826	801	11,068	1,240	408,291	17,308	1,085,604	33,678	1,468,713	36,319	6,019,198	152,671	7,016,162	167,194	9,638,857	222,597

EVDSI, ENBS, and ROI are shown with color gradation (min → zero → max, with darker shades of red and blue indicating larger negative and larger positive values, respectively, of the VOI metric). \$B, Billions of U.S. dollars; \$M, Millions of U.S. dollars; \$K, Thousands of U.S. dollars.

*BRDM: The ETAP is still preferred over THHA in all scenarios (EVDSI & ENBS)*

*TRDM: ETAP is preferred over THHA in 6 scenarios (EVDSI & ENBS)*

# SUMMARY



# Summary for the BRDM

Description (Section)	Number of scenarios				
	All	No testing preferred	ETAP preferred (EVDSI)	ETAP preferred (ENBS)	ETAP preferred (ROI)
Baseline analysis (6.1.1)	9	1	8	8	8
Exposure sensitivity analysis (6.2.1)	81	10	71	71	71
Cost sensitivity analysis (6.2.2)	27	12	15	15	15
Toxicity sensitivity analysis (6.2.3)	9	3	6	6	6
Population size sensitivity analysis (6.2.4)	18	0	18	18	18
Discordance sensitivity analysis (6.2.6)	9	3	6	6	6
<b>All scenarios</b>	<b>153</b>	<b>29 (19%)</b>	<b>124 (81%)</b>	<b>124 (81%)</b>	<b>124 (81%)</b>

# Summary for the BRDM

Description (Section)	Number of scenarios				
	All	No testing preferred	ETAP preferred (EVDSI)	ETAP preferred (ENBS)	ETAP preferred (ROI)
Baseline analysis (6.1.1)	9	1	8	8	8
Exposure sensitivity analysis (6.2.1)	81	10	71	71	71
Cost sensitivity analysis (6.2.2)	27	12	15	15	15
Toxicity sensitivity analysis (6.2.3)	9	3	6	6	6
Population size sensitivity analysis (6.2.4)	18	0	18	18	18
Discordance sensitivity analysis (6.2.6)	9	3	6	6	6
<b>All scenarios</b>	<b>153</b>	<b>29 (19%)</b>	<b>124 (81%)</b>	<b>124 (81%)</b>	<b>124 (81%)</b>

*19% of scenarios led to negative EVDSI, ENBS, and ROI for both ETAP and THHA*

# Summary for the BRDM

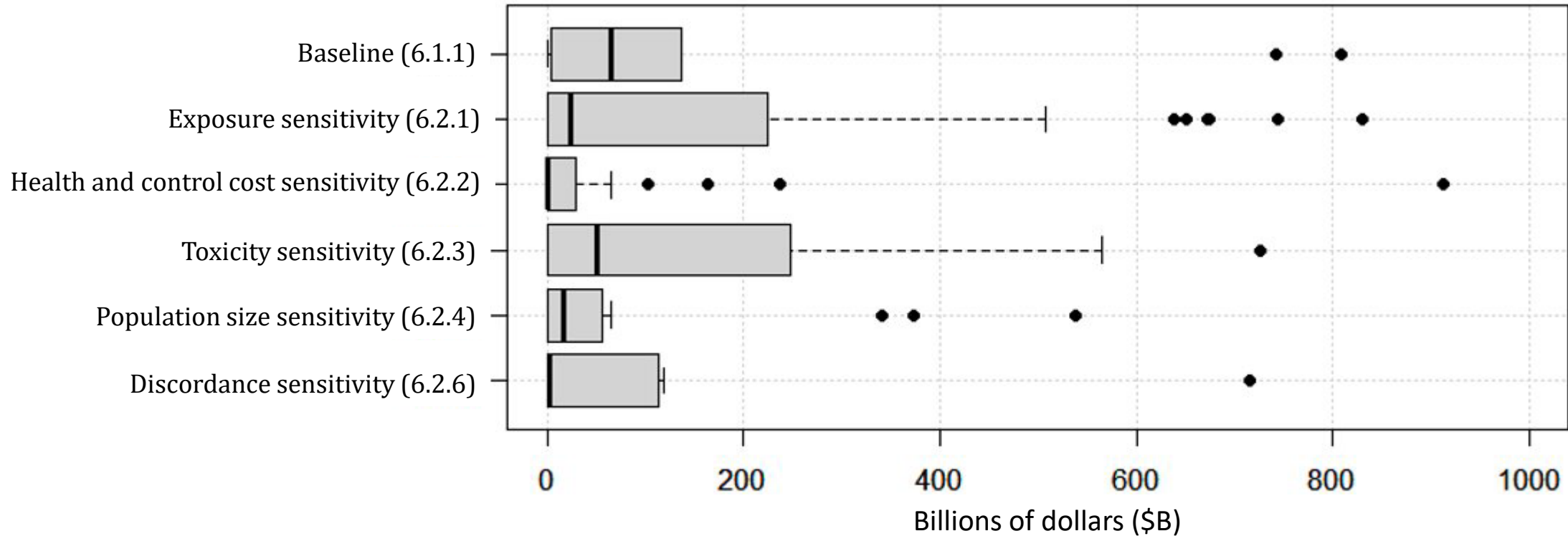
Description (Section)	Number of scenarios				
	All	No testing preferred	ETAP preferred (EVDSI)	ETAP preferred (ENBS)	ETAP preferred (ROI)
Baseline analysis (6.1.1)	9	1	8	8	8
Exposure sensitivity analysis (6.2.1)	81	10	71	71	71
Cost sensitivity analysis (6.2.2)	27	12	15	15	15
Toxicity sensitivity analysis (6.2.3)	9	3	6	6	6
Population size sensitivity analysis (6.2.4)	18	0	18	18	18
Discordance sensitivity analysis (6.2.6)	9	3	6	6	6
<b>All scenarios</b>	<b>153</b>	<b>29 (19%)</b>	<b>124 (81%)</b>	<b>124 (81%)</b>	<b>124 (81%)</b>

*19% of scenarios led to negative EVDSI, ENBS, and ROI for both ETAP and THHA*

*ETAP was preferred over THHA whenever at least one of the tests produced positive delay-adjusted VOI values*

# Summary for the BRDM

Boxplot of  $ENBS_{diff} = ENBS_{ETAP} - ENBS_{THHA}$



*The median difference in ENBS values for ETAP and THHA was \$47 B, ranging from as low as \$4 M to as high as \$1 T*

# Summary for the TRDM

Description	Number of scenarios				
	All	No testing required	ETAP preferred (EVDSI)	ETAP preferred (ENBS)	ETAP preferred (ROI)
Baseline analysis (6.1.2)	9	0	8	8	9
Exposure sensitivity analysis (6.2.1)	81	12	66	66	69
Cost sensitivity analysis (6.2.2)	18	0	16	17	18
Toxicity sensitivity analysis (6.2.3)	9	0	7	7	9
Population size sensitivity analysis (6.2.4)	18	0	16	17	18
TRL sensitivity analysis (6.2.5)	9	1	6	6	8
Discordance sensitivity analysis (6.2.6)	9	0	6	6	8
<b>All scenarios</b>	<b>153</b>	<b>13 (8.5%)</b>	<b>125 (89.3%)*</b>	<b>127 (90.7%)*</b>	<b>139 (99.3%)*</b>

\* Proportions calculated based on 140 (= 153 - 13) scenarios where additional toxicity testing was required

# Summary for the TRDM

Description	Number of scenarios				
	All	No testing required	ETAP preferred (EVDSI)	ETAP preferred (ENBS)	ETAP preferred (ROI)
Baseline analysis (6.1.2)	9	0	8	8	9
Exposure sensitivity analysis (6.2.1)	81	12	66	66	69
Cost sensitivity analysis (6.2.2)	18	0	16	17	18
Toxicity sensitivity analysis (6.2.3)	9	0	7	7	9
Population size sensitivity analysis (6.2.4)	18	0	16	17	18
TRL sensitivity analysis (6.2.5)	9	1	6	6	8
Discordance sensitivity analysis (6.2.6)	9	0	6	6	8
<b>All scenarios</b>	<b>153</b>	<b>13 (8.5%)</b>	<b>125 (89.3%)*</b>	<b>127 (90.7%)*</b>	<b>139 (99.3%)*</b>

\* Proportions calculated based on 140 (= 153 - 13) scenarios where additional toxicity testing was required

*In 13 scenarios, the TRDM required no additional toxicity testing (mostly due to more precise exposure information)*

# Summary for the TRDM

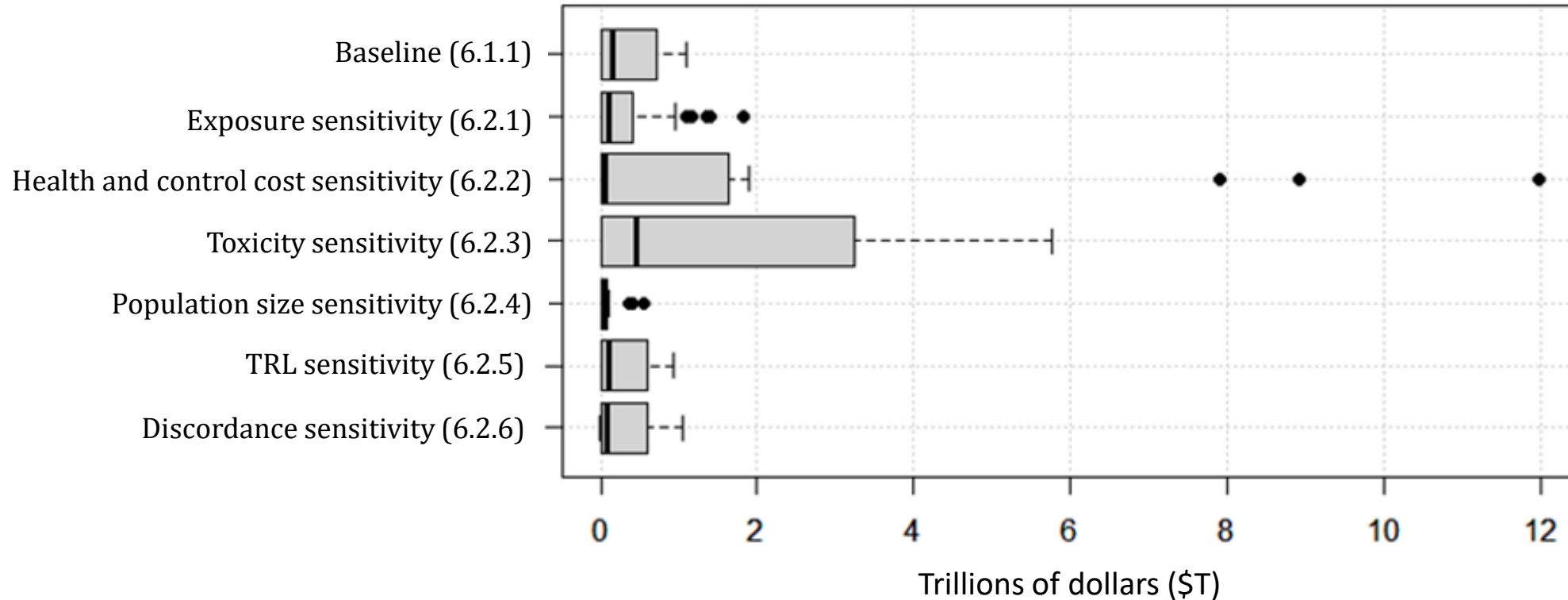
Description	Number of scenarios				
	All	No testing required	ETAP preferred (EVDSI)	ETAP preferred (ENBS)	ETAP preferred (ROI)
Baseline analysis (6.1.2)	9	0	8	8	9
Exposure sensitivity analysis (6.2.1)	81	12	66	66	69
Cost sensitivity analysis (6.2.2)	18	0	16	17	18
Toxicity sensitivity analysis (6.2.3)	9	0	7	7	9
Population size sensitivity analysis (6.2.4)	18	0	16	17	18
TRL sensitivity analysis (6.2.5)	9	1	6	6	8
Discordance sensitivity analysis (6.2.6)	9	0	6	6	8
<b>All scenarios</b>	<b>153</b>	<b>13 (8.5%)</b>	<b>125 (89.3%)*</b>	<b>127 (90.7%)*</b>	<b>139 (99.3%)*</b>

\* Proportions calculated based on 140 (= 153 - 13) scenarios where additional toxicity testing was required

*In 13 scenarios, the TRDM required no additional toxicity testing (mostly due to more precise exposure information)  
When the ENBS metric was used, ETAP was preferred in more than 90% of the scenarios*

# Summary for the TRDM

Boxplot of  $ENBS_{diff} = ENBS_{ETAP} - ENBS_{THHA}$



*The median difference in ENBS values for ETAP and THHA was **\$81 B**, ranging from as low as **-\$2.7 M** to as high as **\$12 T***