



Start thinking HTA early

15/07/22; Anja Schiel, PhD, Special Adviser / Lead Methodologist in Regulatory and Pharmacoeconomic Statistics; Scientific Advice Working Party member; Methodology Working Party member; Vice-Chair EUnetHTA21 JSC CSCQ



Norwegian
Medicines Agency

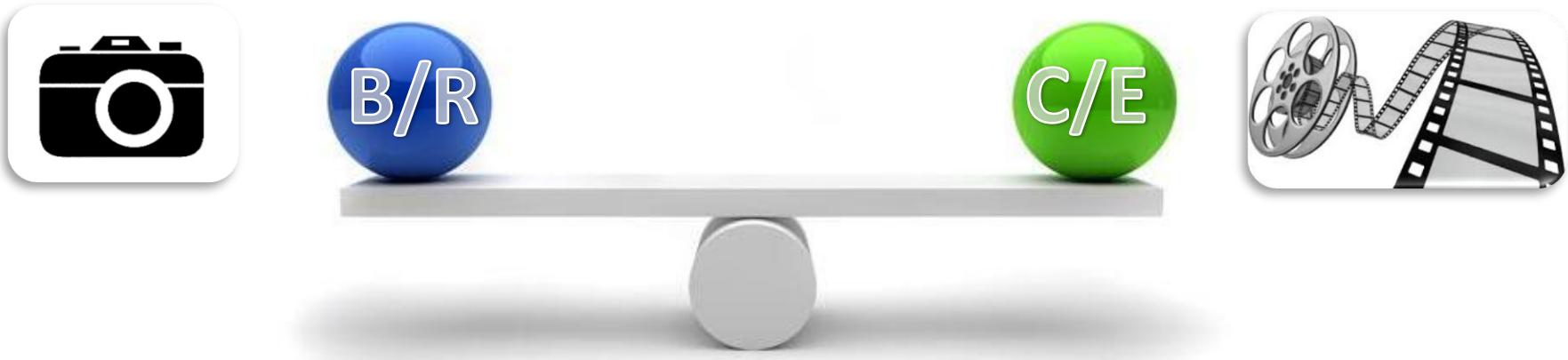
Disclaimer

The views expressed are those of the presenter and should not be understood or quoted as being made on behalf of the Norwegian Medicines Agency (NoMA) or of the European Medicines Agency (EMA) or its scientific committees or reflecting the position of the EMA.

Why is what is good enough for approval not
good enough for reimbursement?

The difference

- Health economic models predict the future based on available data from different sources



- All models are wrong; some models are useful

George E. P. Box; Norman R. Draper (1987)

The underlying questions differ

- Clinical trial = Regulator



Efficacy (B/R)

Does it work in experimental setting

Population selected

Placebo or a selected comparator

- Real world = HTA



Effectiveness (C/E)

How does it work in medical practice



Patients as they come



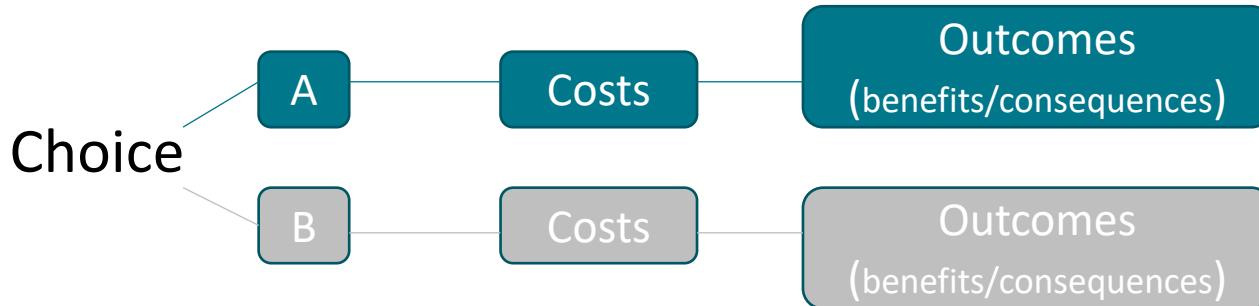
Many alternative treatments

Type	Unit of effect	Strength	Limitations
Cost–benefit analysis (CBA)	All effects measured in €	The net benefit (NB) is easy to interpret. When a new treatments extra benefits are worth more than the extra costs then $NB > 0$	<ul style="list-style-type: none"> It is difficult to measure the value of all health outcomes (positive or negative) in € Ethical aspects come into the discussion (Prioritisation, discrimination, the Pareto principle)
Cost-utility analysis (CUA)	Two effects (quality and length of life); reflected as quality-adjusted life years (QALY's)	Patient relevant outcomes involving both quality and length of life can be incorporated into the analysis. In theory the QALY measure is 'universal', allowing evaluation of very different decision problems with each other.	<ul style="list-style-type: none"> QALY outcomes can be biased by method, indication and population Society might value a QALY for different patient groups differently (and who should we ask, patients or healthy people form the street?)
Cost-effectiveness (CEA)	Effect measured in 'natural units'	There is one outcome and it is measured in its 'natural unit'.	<ul style="list-style-type: none"> Only one outcome is considered for the effect conclusion (no context)
Cost-minimization (CMA)	No effects measured	Only cost data are needed	<ul style="list-style-type: none"> Few treatments have truly identical outcomes Still some evidence is needed to confirm the assumption of 'equality'

Type	Unit of effect	Strength	Limitations
Cost–benefit analysis (CBA)	All effects measured in €	The net benefit (NB) is easy to interpret. When a new treatments extra benefits are worth more than the extra costs then $NB > 0$	<ul style="list-style-type: none"> It is difficult to measure the value of all health outcomes (positive or negative) in € Ethical aspects come into the discussion (Prioritisation, discrimination, the Pareto principle)
Cost-utility analysis (CUA)	Two effects (quality and length of life); reflected as quality-adjusted life years (QALY's)	Patient relevant outcomes involving both quality and length of life can be incorporated into the analysis. In theory the QALY measure is 'universal', allowing evaluation of very different decision problems with each other.	<ul style="list-style-type: none"> QALY outcomes can be biased by method, indication and population Society might value a QALY for different patient groups differently (and who should we ask, patients or healthy people form the street?)
Cost-effectiveness (CEA)	Effect measured in 'natural units'	There is one outcome and it is measured in its 'natural unit'.	<ul style="list-style-type: none"> Only one outcome is considered for the effect conclusion (no context)
Cost-minimization (CMA)	No effects measured	Only cost data are needed	<ul style="list-style-type: none"> Few treatments have truly identical outcomes Still some evidence is needed to confirm the assumption of 'equality'

HTA: the basics

- The aim is to **maximize the health of the total population within the given budget**
- HTAs want value for money!

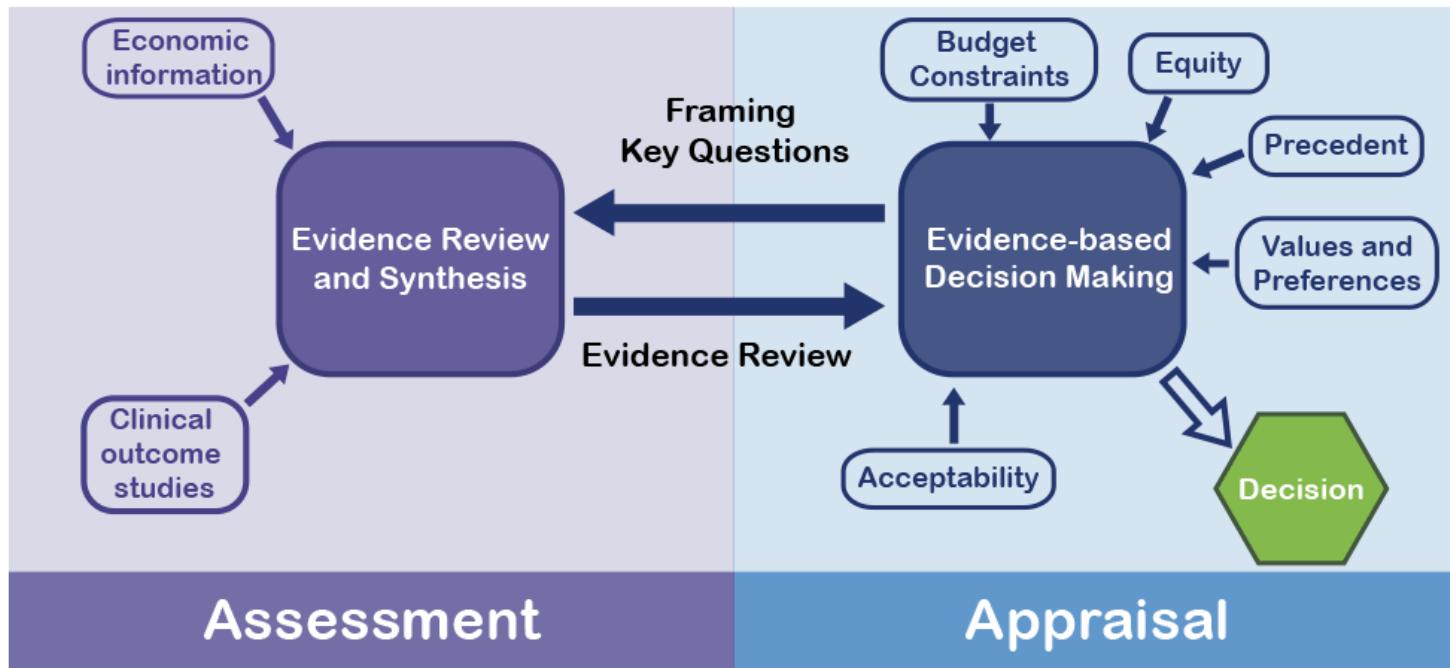


$$ICER = \frac{\text{Incremental costs (A-B)}}{\text{Incremental benefit (A-B)}}$$

Economic evaluation
‘the **comparative analysis** of alternative courses of action in terms of both their **costs and consequences**’
(Drummond McGuire, 2001)

Type	Unit of effect	Strength	Limitations
Cost–benefit analysis (CBA)	All effects measured in €	The net benefit (NB) is easy to interpret. When a new treatments extra benefits are worth more than the extra costs then $NB > 0$	<ul style="list-style-type: none"> It is difficult to measure the value of all health outcomes (positive or negative) in € Ethical aspects come into the discussion (Prioritisation, discrimination, the Pareto principle)
Cost-utility analysis (CUA)	Two effects (quality and length of life); reflected as quality-adjusted life years (QALY's)	Patient relevant outcomes involving both quality and length of life can be incorporated into the analysis. In theory the QALY measure is 'universal', allowing evaluation of very different decision problems with each other.	<ul style="list-style-type: none"> QALY outcomes can be biased by method, indication and population Society might value a QALY for different patient groups differently (and who should we ask, patients or healthy people form the street?)
Cost-effectiveness (CEA)	Effect measured in 'natural units'	There is one outcome and it is measured in its 'natural unit'.	<ul style="list-style-type: none"> Only one outcome is considered for the effect conclusion (no context)
Cost-minimization (CMA)	No effects measured	Only cost data are needed	<ul style="list-style-type: none"> Few treatments have truly identical outcomes Still some evidence is needed to confirm the assumption of 'equality'

The two main components of HTA: Assessment and Appraisal



Choose your perspective

Societal perspective

- Medical costs borne by third-party payers and paid out-of-pocket by patients
- Time costs of patients in seeking and receiving care
- Time costs of informal (unpaid) caregivers
- Transportation costs
- Effects on future productivity and consumption
- Other costs and effects outside the health care sector

Health sector perspective

- Include all costs and benefits impacting a system of providers, payers and patients.
- Do not consider impact outside of the health system (e.g. long-term value to patients)
- Based on Direct Medical Costs reimbursed by a third party
- Can include out-of-pocket costs to the patient
- Can include current and future costs as a result of a pathway of care

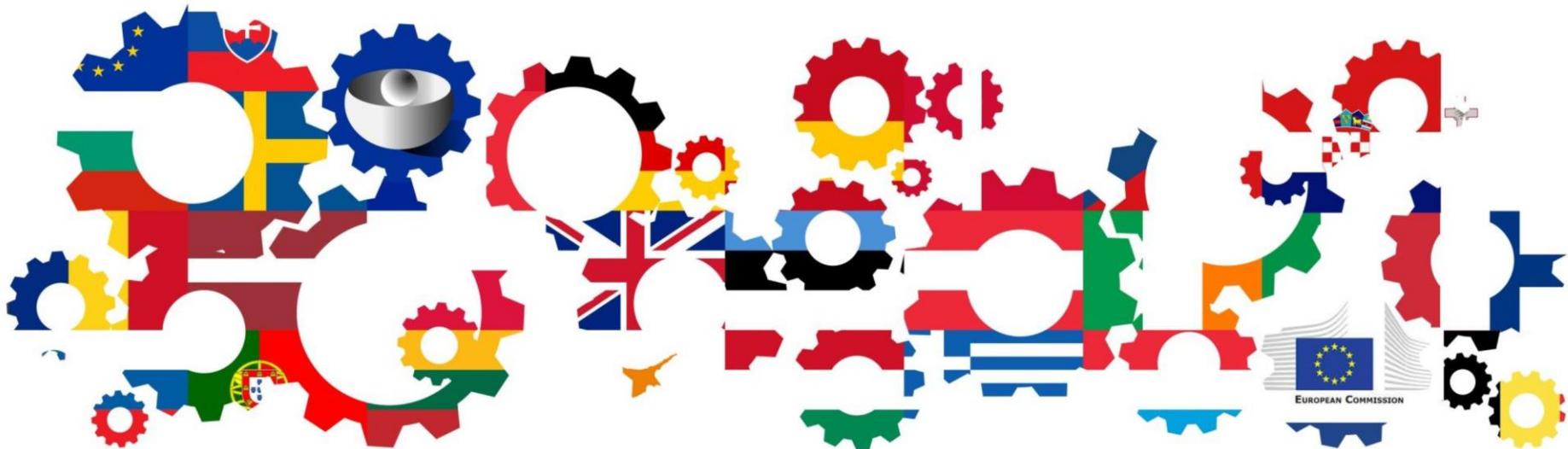
Patient perspective

- Fees for consultation
- Bed day charges at the health facility
- Expenses on medicines, diagnostic tests,
- Travelling expenses to the health facility for the patient and accompanied persons for treatment,
- Amount spent on meal / food taken while waiting for treatment
- Time loss of the patient and the accompanied persons for seeking treatment
- Informal caregiving
- Pain and suffering



**How do you want it - the crystal mumbo jumbo
or statistical probability?**

The European medicines regulatory network



~ 50 national regulatory authorities

European Commission

European Medicines Agency

How to do things differently (for a reason).....



Cost-effectiveness

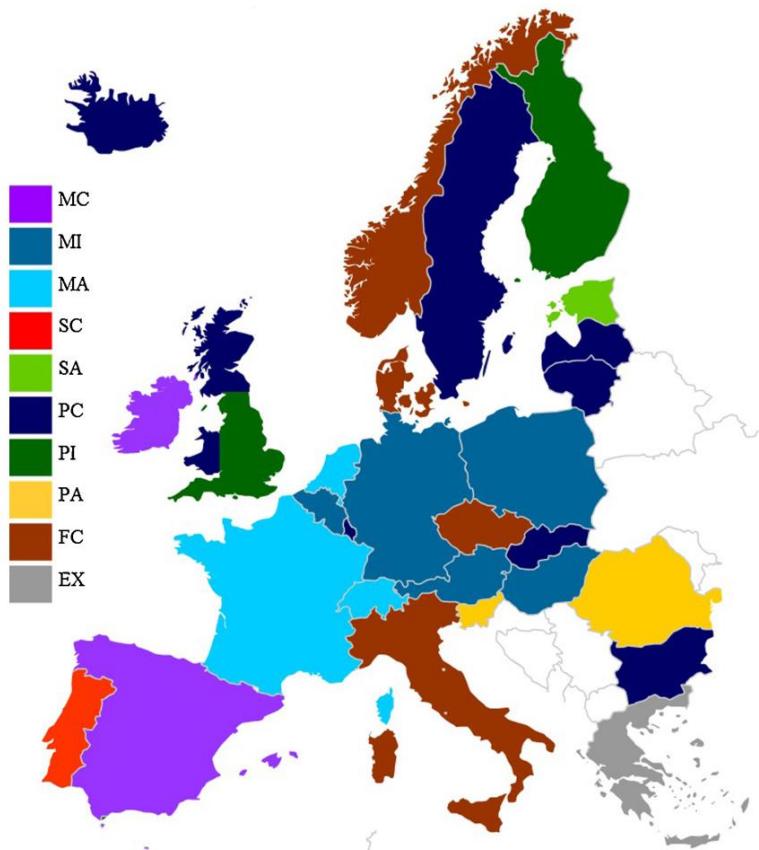
Added clinical Benefit

Budget optimisation

...and highly complicated

310

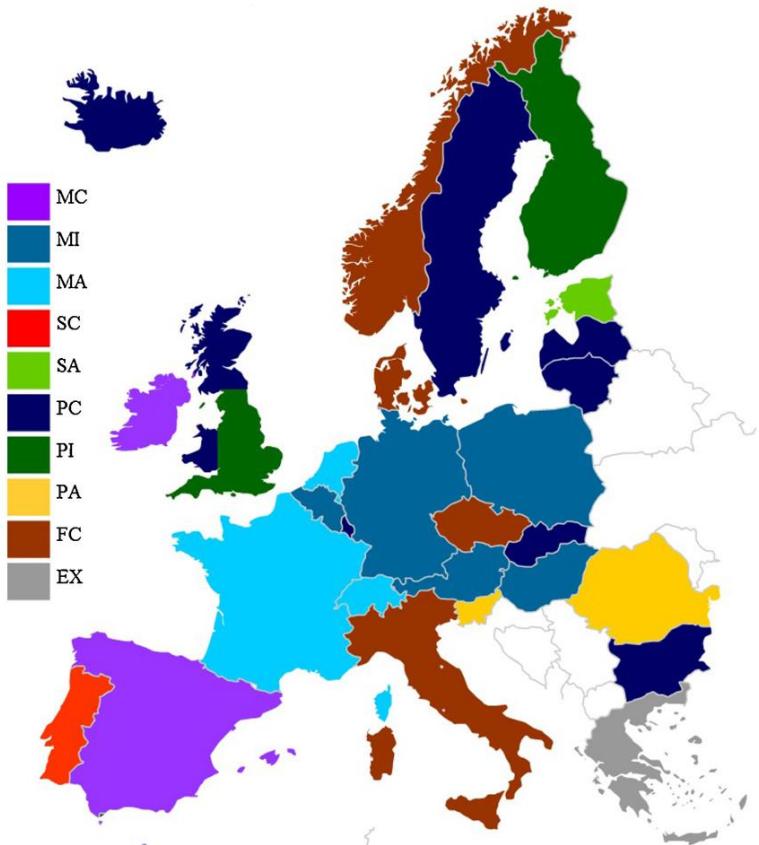
N. Allen et al. / Health Policy 113 (2013) 305–312



...and highly complicated

310

N. Allen et al. / Health Policy 113 (2013) 305–312



Development of archetypes for non-ranking classification and comparison of European National Health Technology Assessment systems

Nicola Allen ^{a,b,*}, Franz Pichler ^{b,c,1}, Tina Wang ^b, Sundip Patel ^a, Sam Salek ^a

^a Centre for Socioeconomic Research, School of Pharmacy and Pharmaceutical Sciences, Cardiff University, Redwood Building, King Edward VII Avenue, Cardiff CF10 3NB, UK

^b Centre for Innovation in Regulatory Science (formerly CMR International Institute for Regulatory Science), Hatton Garden, London EC1N 8JS, UK

^c Eli Lilly and Company, Erl Wood Manor, Windlesham, Surrey, GU20 6PH, UK

System Process Archetypes

	M	S	P	F	E
C	 DC (CYP) NCPE (IRE) DGFPs (SPA) MOH DTC (MAL)	 INFARMED (POR)	 AWMG (WAL) PDL (BUL) IMPRC (ICE) CHE (LAT) LRC (LT) MSS (LUX) CC (SVK) SMC (SCO) TLV (SWE)	 SUKL (CZE) DKMA (DEN) NOMA (NOR) AIFA (ITA)	
I	 HEK (AUS) INAMI (BEL) IQWIG (GER) OHTA (HUN) AHTAPol (POL)		 NICE (ENG) HILA (FIN)		
A	 HAS (FRA) CFH (NET) FDC (SWZ)	 SAM (EST)	 MoH (ROM) ZZZS (SVN)		
X	 External HTA AP				GREECE LIECHTENSTEIN

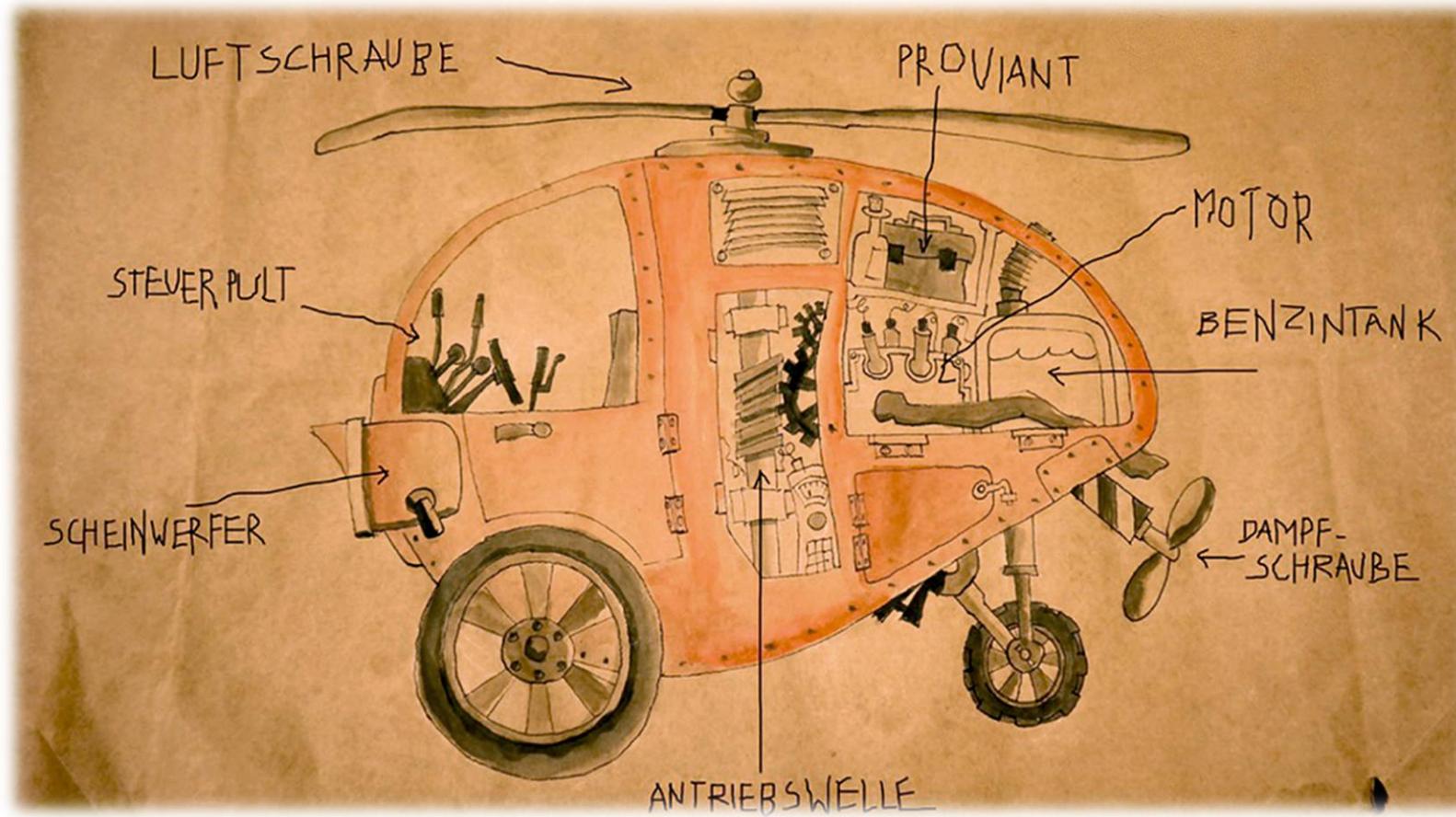
Archetype Key
MC
MI
MA
SC
SA
PC
PI
PA
FC
EX

Now lets go on a tour with worlds most impressive invention as an example...

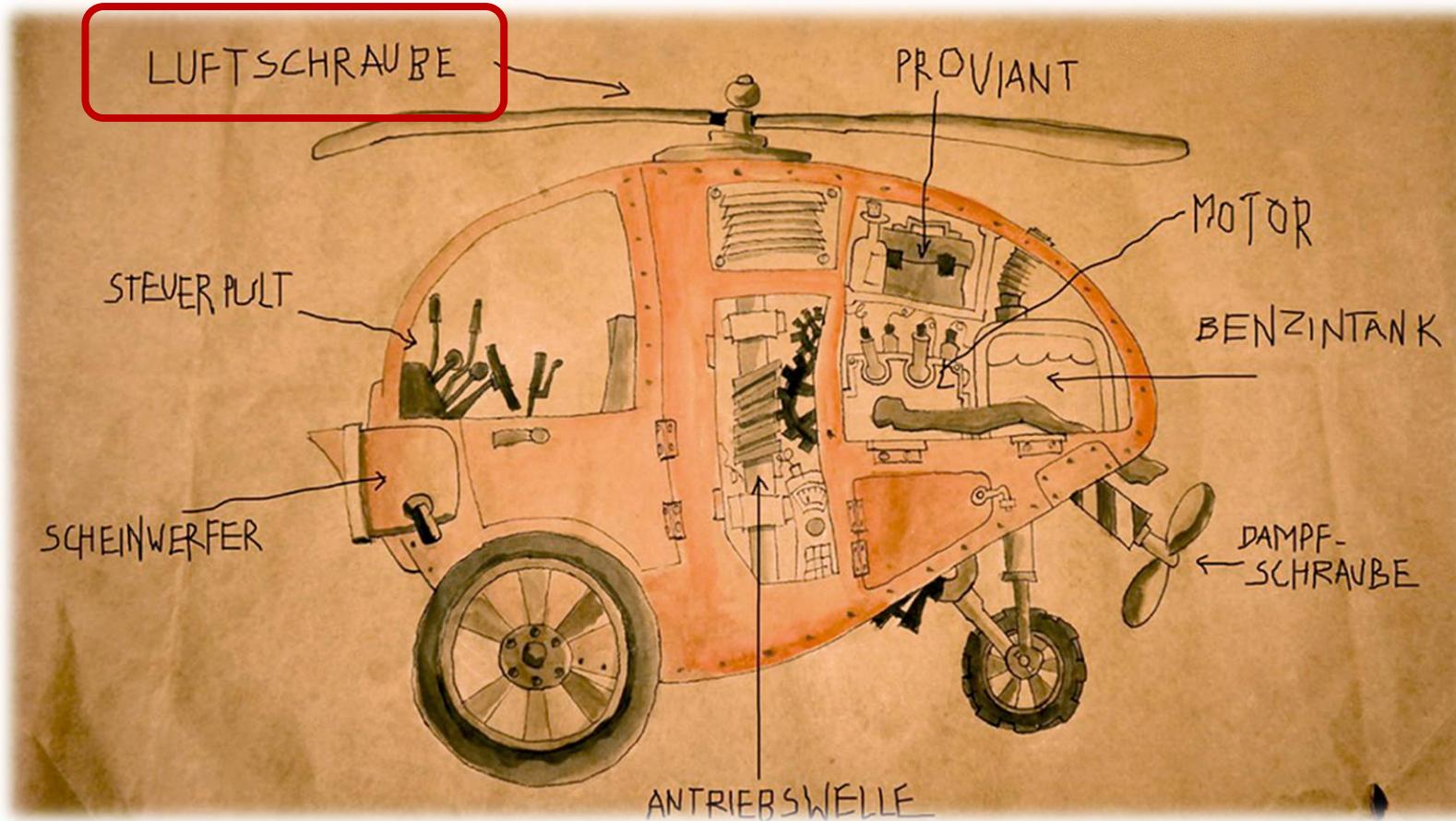
To get you out of the drug-development corner

- My example will be the world famous Fliewatüüt
- Based on the development of this ground-breaking new vehicle I will explain how the assessment of the B/R would likely be conducted and what the challenges might be to get it reimbursed.
- Let's meet the contender.....

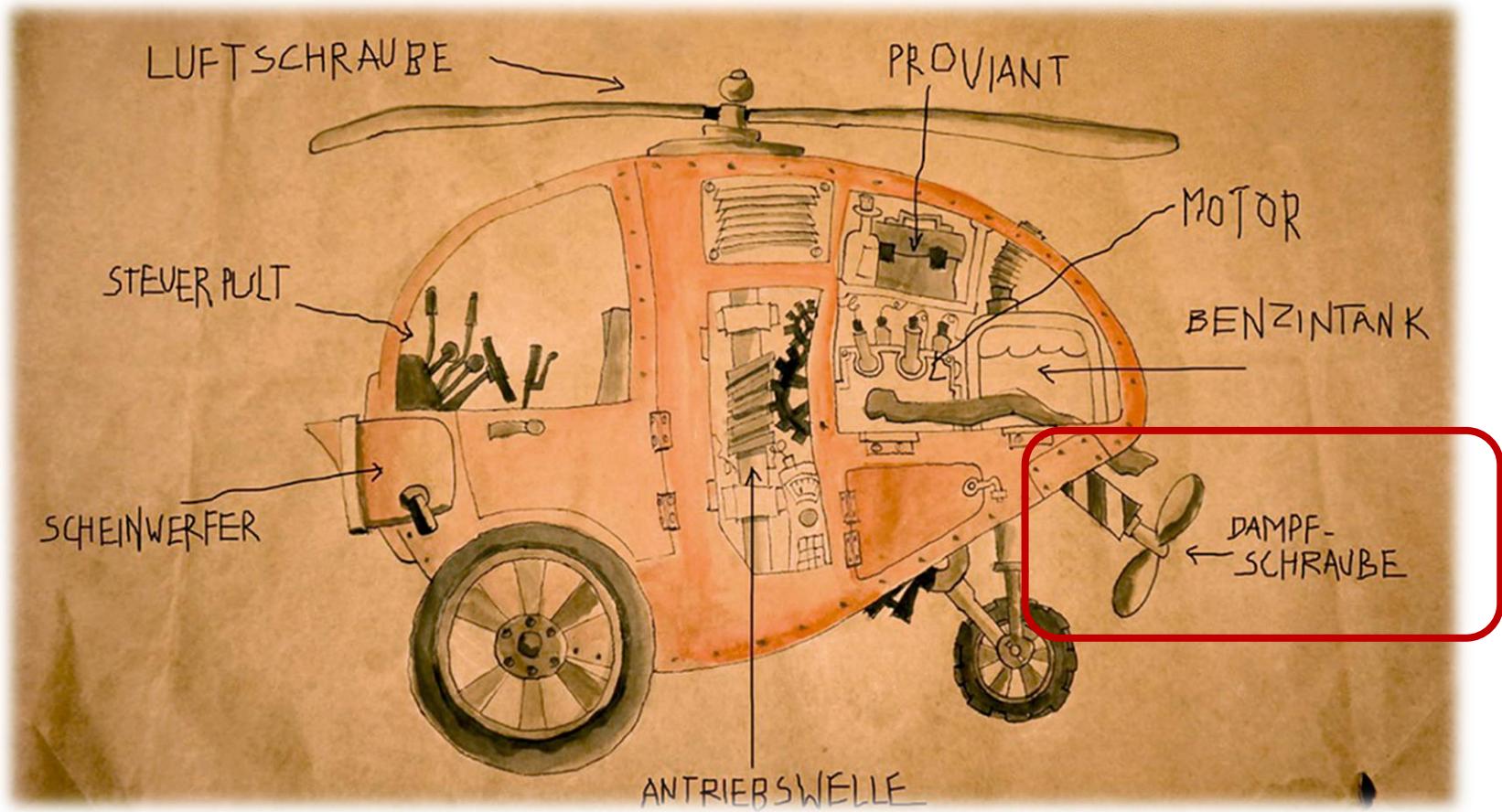
The Fliewatüüt



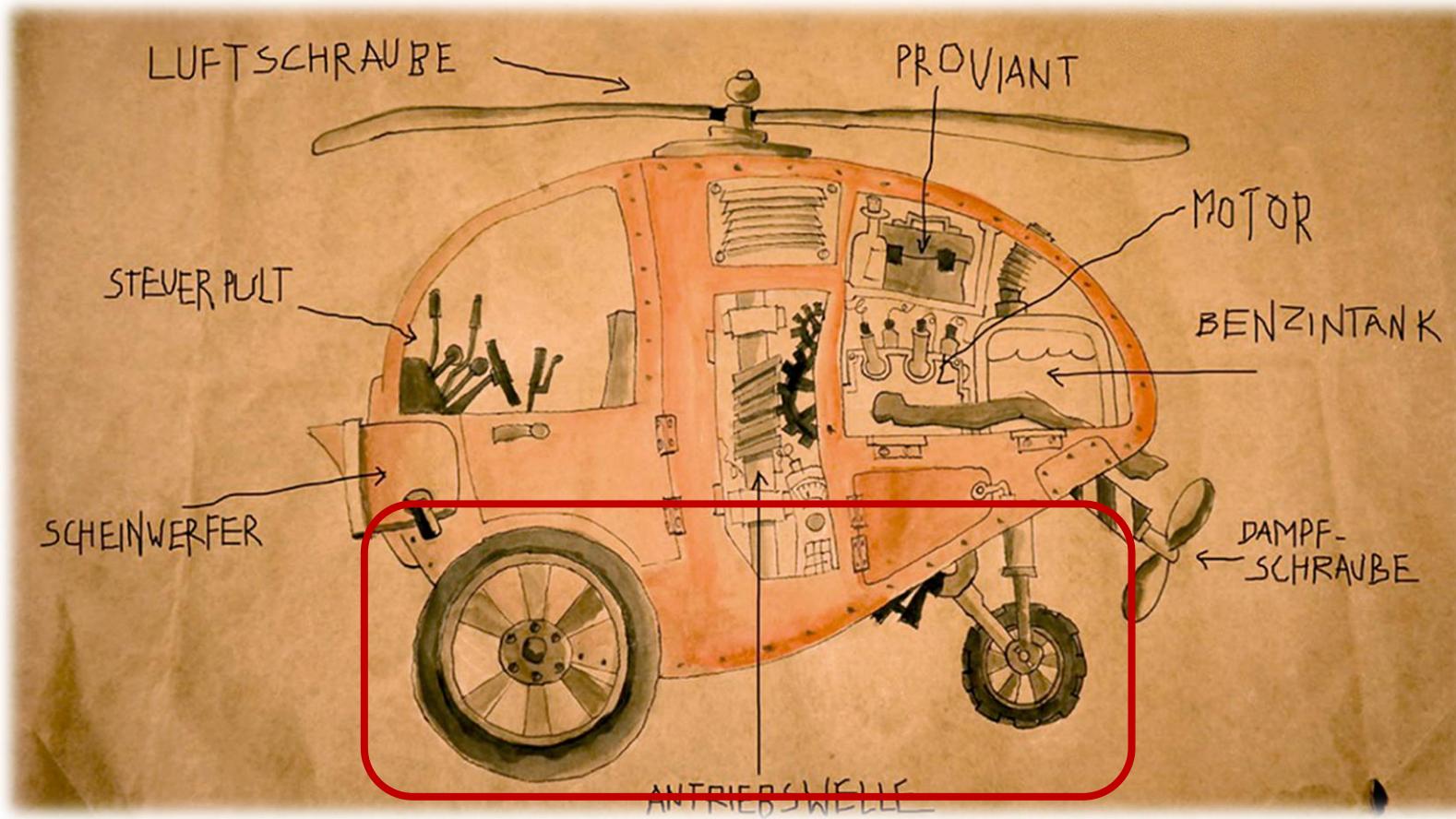
The Fliewatüüt



The Fliewatüüt



The Fliewatüüt

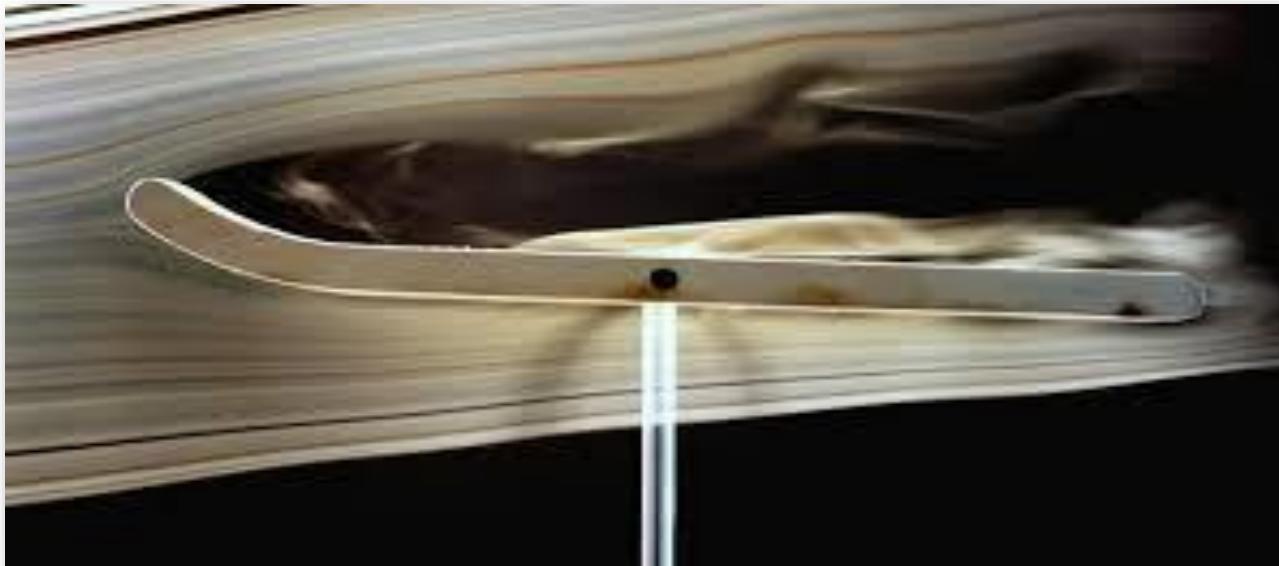


To get the regulatory approval you will need

- A preliminary testing program where you:

To get the regulatory approval you will need

- A preliminary testing program where you:
- Test the aerodynamics of the invention in **wind** and water



To get the regulatory approval you will need

- A preliminary testing program where you:
- Test the aerodynamics of the invention in wind and **water**



To get the regulatory approval you will need

- A preliminary testing program where you:
- Test the aerodynamics of the invention in wind and water
- Provide testing of the **engine**



To get the regulatory approval you will need

- A preliminary testing program where you:
- Test the aerodynamics of the invention in wind and water
- Provide testing of the engine
- Build a prototype



You now probably talk to 'someone' and ask

- Should we develop this further?



You now probably talk to ‘someone’ and ask

- Should we develop this further?
- If the answer is yes you do some more testing...

Phase 3 of your development

- You build an up-scale version close to the final product



You fly it around the Nevada dessert



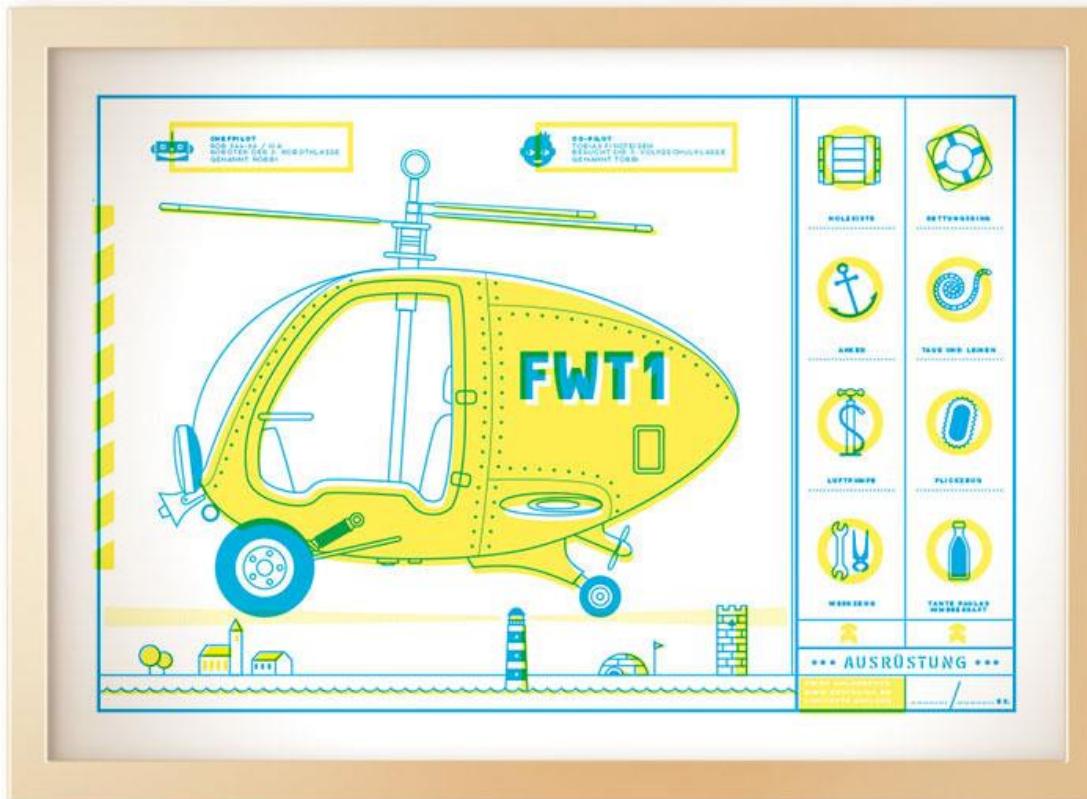
You drive from Oslo to Trondheim



You cross the serene Lak of Mt Pinatubo



You provide a suitable safety instruction manual



Based on this evidence some 'unnamed' agency...

-will grant you the right to sell the Vehicle in all EU member states



But now the hard work actually begins!

If you ask the Germans to pay for this they will

- Want you to compare the driving abilities to a Mercedes, a VW, a BMW and a Opel.
- They declare to be not so interested in the added value of the Helicopter part because the German airspace is crowded as it is.
- The boating capabilities are questionable in their assessment because you tested on a lake, not a river.
- And anyhow, your vehicle doesn't comply fully with regulations for either cars, helicopters or boats.
- But nonetheless you can sell it for one year in Germany anyhow!

If you ask the Italians to pay for this they will

- Want you to compare the driving abilities to a Ferrari or a Lamborghini.
- They declare to be interested in the added value of the Helicopter part but have no Italian build helicopter to compare with and ask you to find a suitable comparator.
- The boating capabilities are interesting, but you didn't test it on the ocean, so they demand you do that in addition (preferably off the Adriatic coast).
- And anyhow, why is the thing so ugly (get a designer) and can it be purchased in different colours?
- If you want to sell it you need to set-up a database with info on how satisfied the users are.

If you ask the British to pay for this they will

- Want you to compare the driving abilities to a suitable car representative for the British car industry.
- They declare to be interested in the added value of the Helicopter but want you to compare it to a Agusta Westland AW159 Wildcat built not later than 2013.
- The boating capabilities are interesting, but you didn't test it in the channel, so they demand evidence that your test is good enough to allow extrapolation to crossing the channel.
- And by the way, you need to provide support for the fact that testing was done in Nevada (too dry), Norway (too wet) and a shallow sweet water lake with no waves.

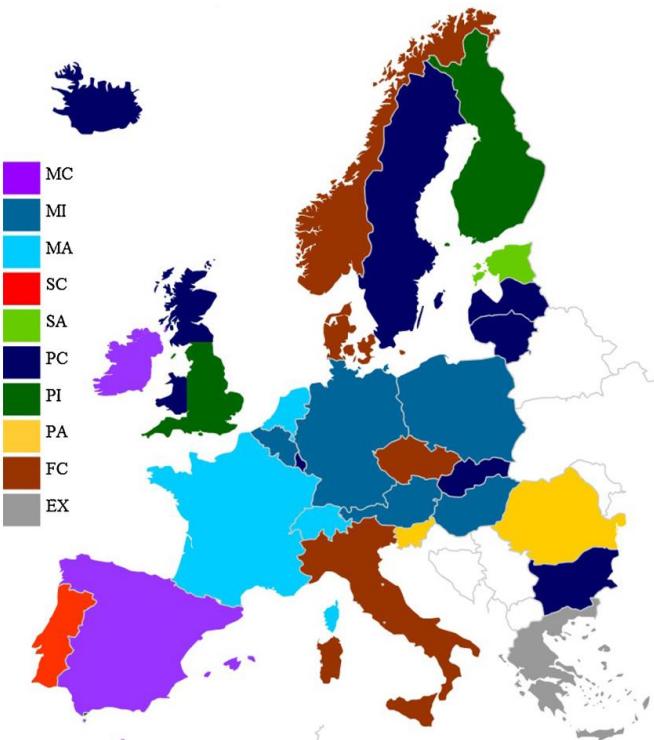
If you ask the NoMA to pay for this they will

- Want you to compare the driving abilities to a suitable car representative for Scandinavia, so maybe a Volvo or a Saab.
- They declare to be interested in the added value of the Helicopter but realize that the actual real world use in Norway is zero because our helicopters are usually grounded for various reasons.
- The boating capabilities are interesting, but you would have to provide data with the Hurtigruten boat as a comparator.
- And by the way, we agree with the British that you need to provide support for the fact that testing was done in Nevada (too dry), Norway (roads not very busy at 3 am) and a shallow sweet water lake with no waves (Fjord).

And remember, this is just the tip of the iceberg

310

N. Allen et al. / Health Policy 113 (2013) 305–312



The conclusion

- Getting regulatory approval requires evidence that can support testing in **ideal circumstances**, also known as the RCT.
- Reimbursement decisions has to take the actual context of how your product will be used **in the wild** into account, as well as it is about comparing the new with the old.
- It is this (real world) information that normally has to be provided by some additional data source other than the original RCT and is considered in a **national context**.

The conclusion

- Getting regulatory approval requires evidence that can support testing in **ideal circumstances**, also known as the RCT. **Internal Validity**
- Reimbursement decisions has to take the actual context of how your product will be used **in the wild** into account, as well as it is about comparing the new with the old. **Relative effectiveness**
- It is this (real world) information that normally has to be provided by some additional data source other than the original RCT and is considered in a **national context**.
External Validity

Healthcare Technology Assessment (HTA)

- *is the systematic evaluation of the properties, effects, and/or impacts of health technology.*

Purpose- to address the direct, indirect, intended, and unintended benefits and consequences of the adoption of healthcare technology .

-Hailey, Babidge, Cameron, & Davignon 2010

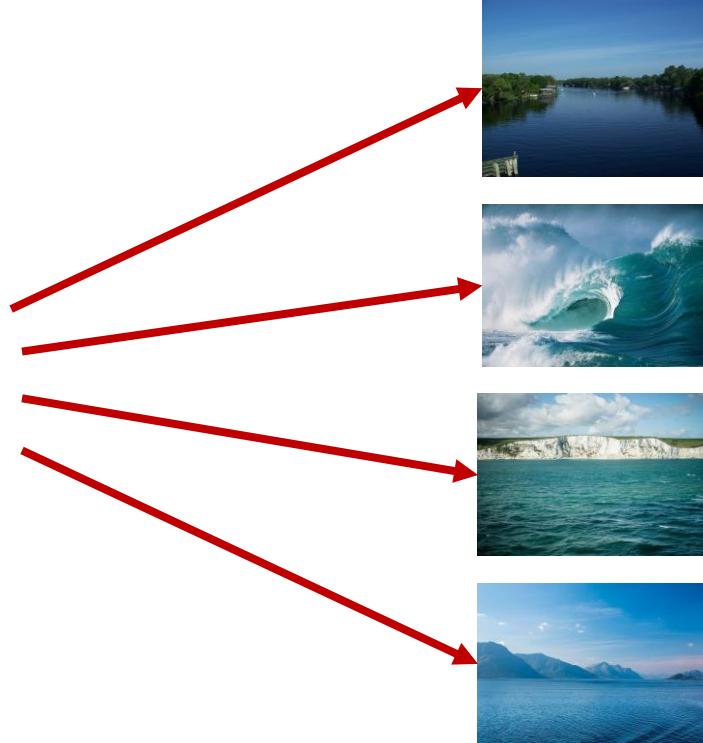
Healthcare Technology Assessment (HTA)

- *is the systematic evaluation of the properties, effects, and/or impacts of health technology.*

Purpose- to address the direct, indirect, intended, and **unintended benefits and consequences** of the adoption of healthcare technology .

-Hailey, Babidge, Cameron, & Davignon 2010

But here is the biggest misunderstanding!



The PICO



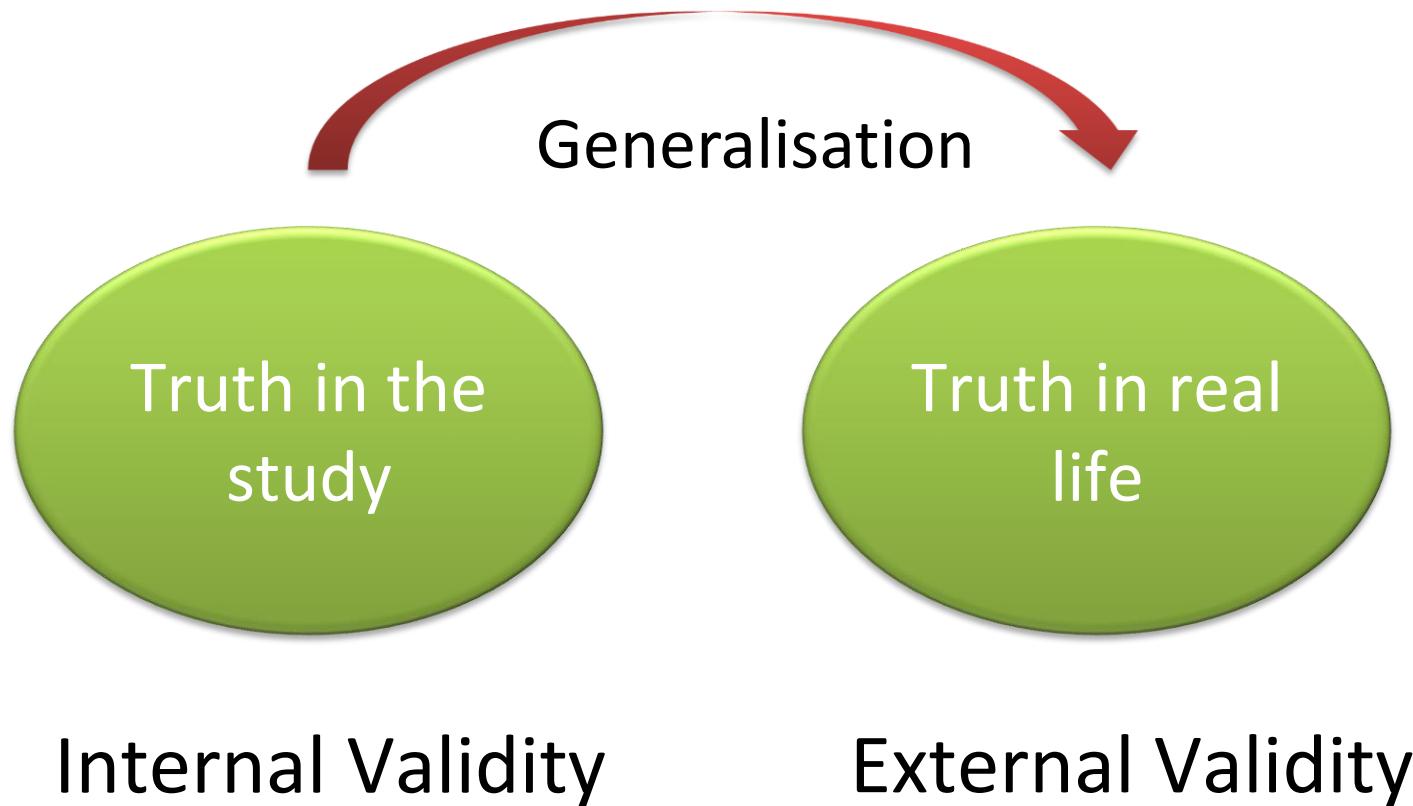
You are not Santa , you are supposed to do this



External Validity



Internal versus External validity



So which mistakes were made in the *Fliewatüüt* development program?

So which mistakes were made in the *Fliewatüüt* development program?

- The development program focused too heavily on the regulatory approval

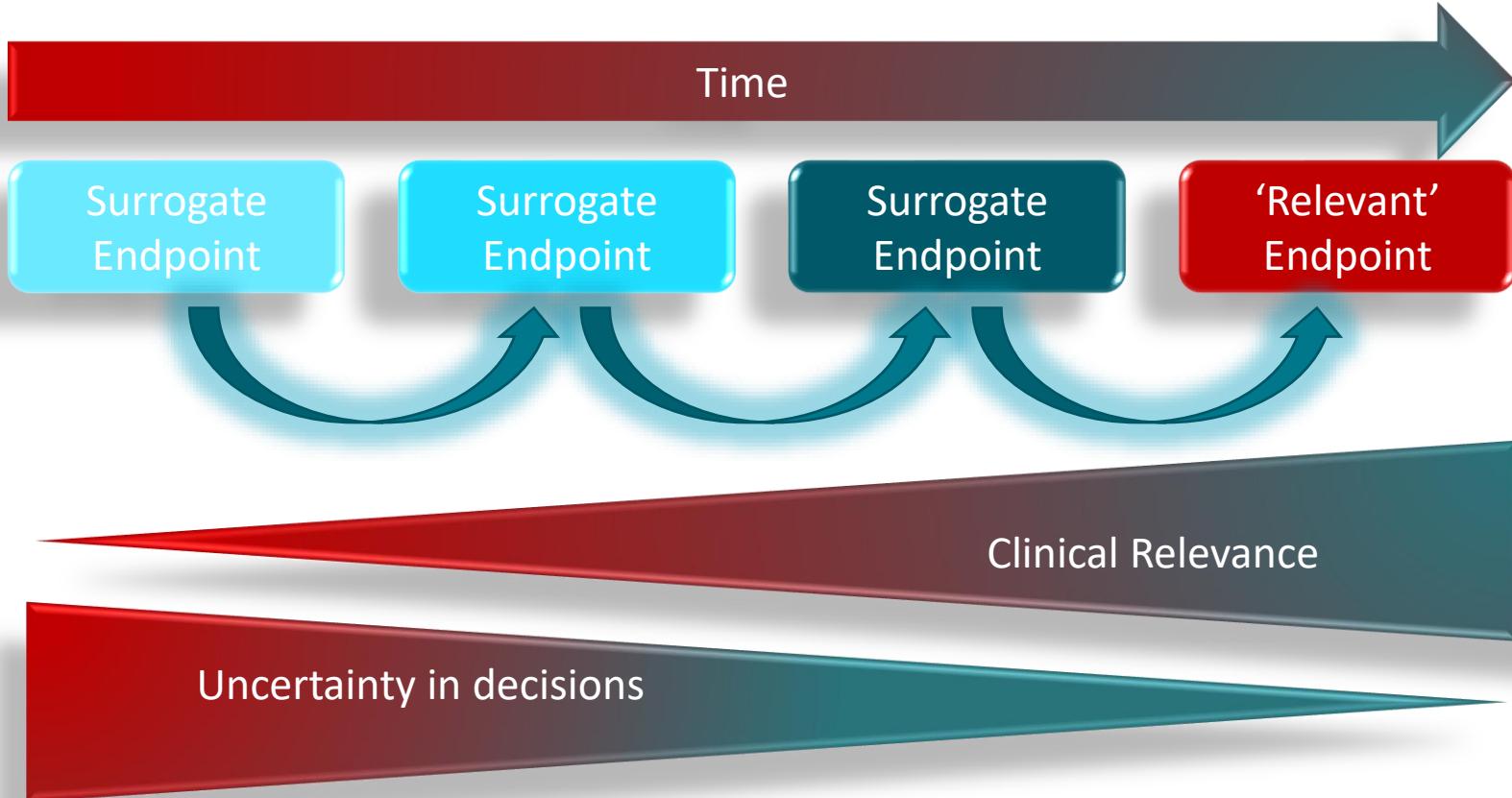
So which mistakes were made in the *Fliewatüüt* development program?

- The development program focused too heavily on the regulatory approval

You now probably talk to ‘someone’ and ask

- Should we develop this further?
- If the answer is yes you do some more testing...

Uncertainty is piling up

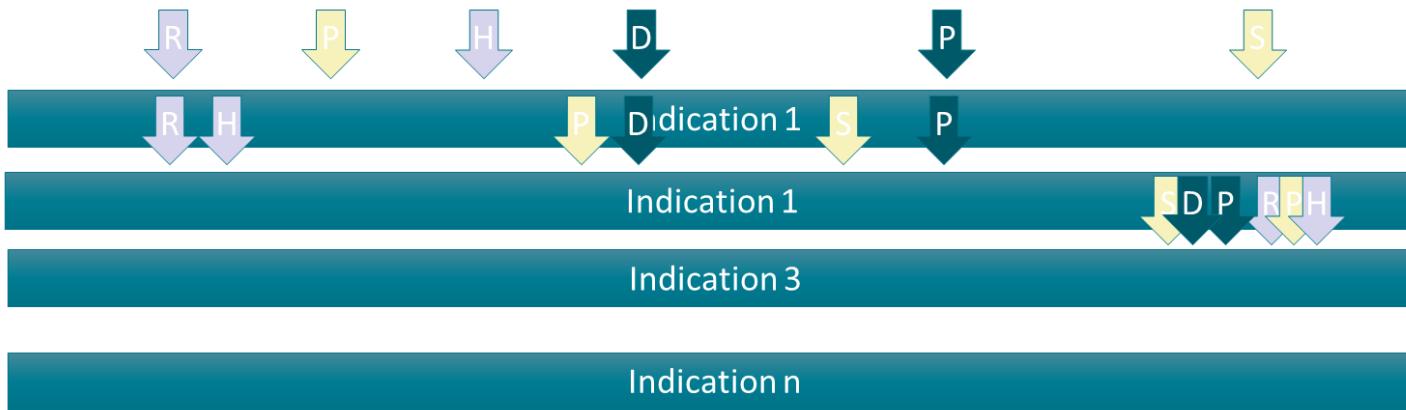


The Sweet-spot

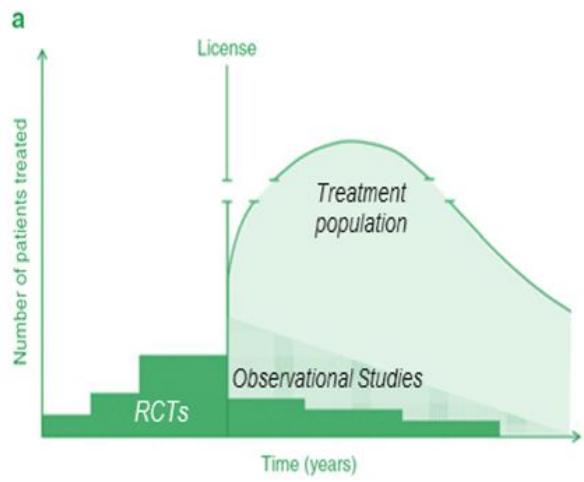
Clinical Relevance = Interpretability

Uncertainty in decisions

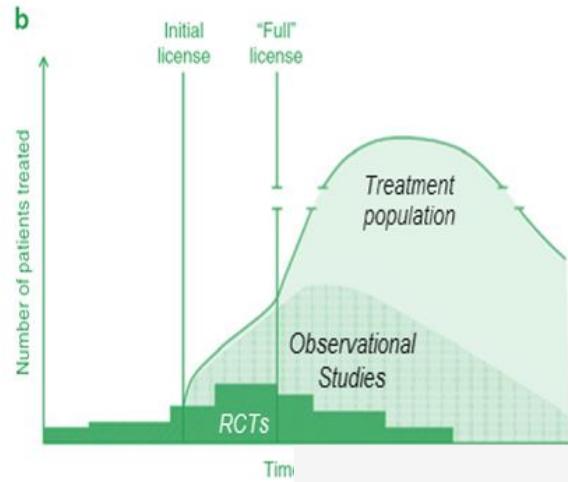
The range of sweet-spots



Conventional scenario



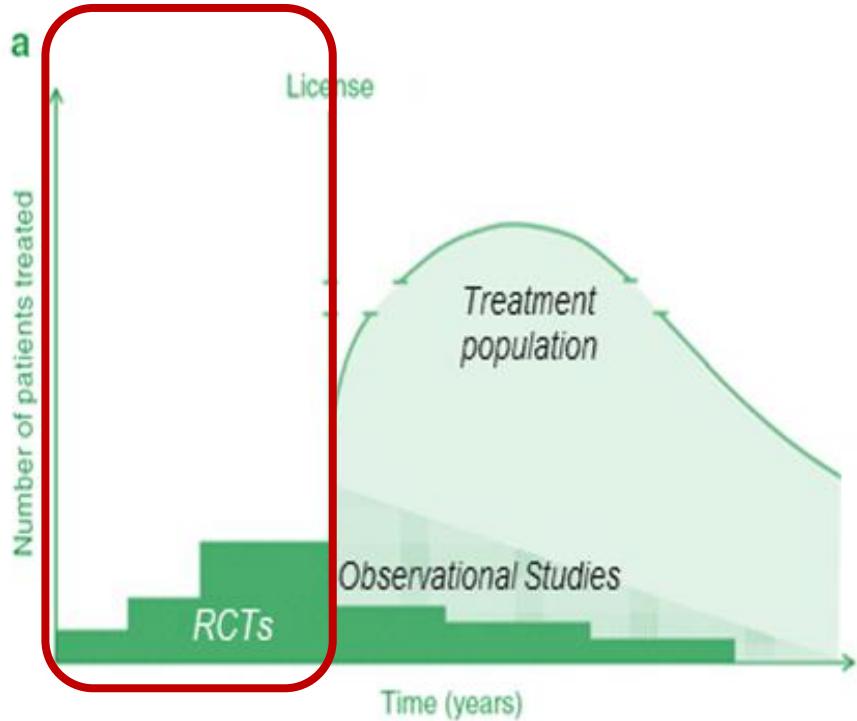
Emerging scenario



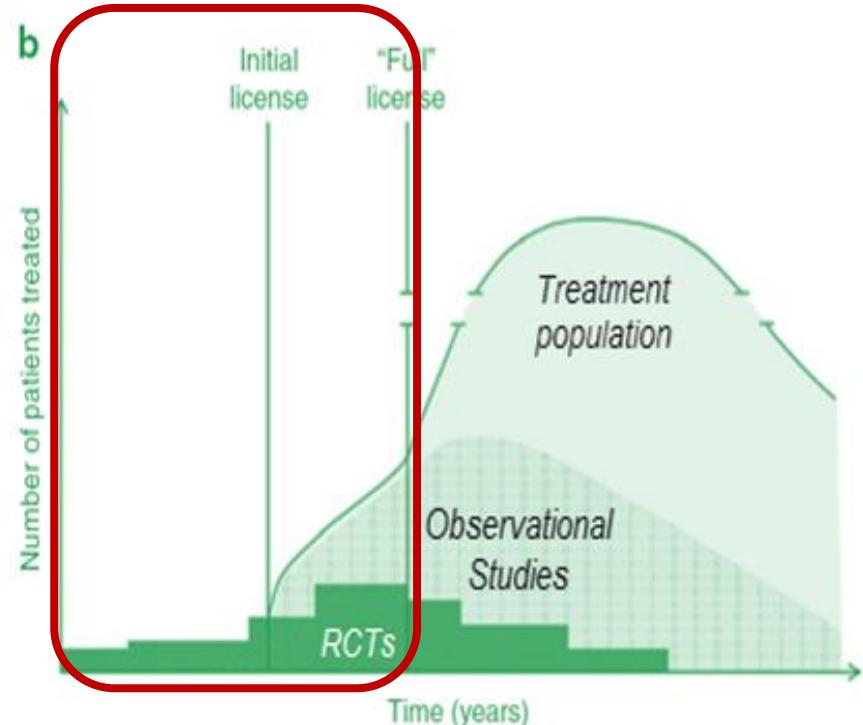
RWE Intensifying Across Product Lifecycle



Conventional scenario

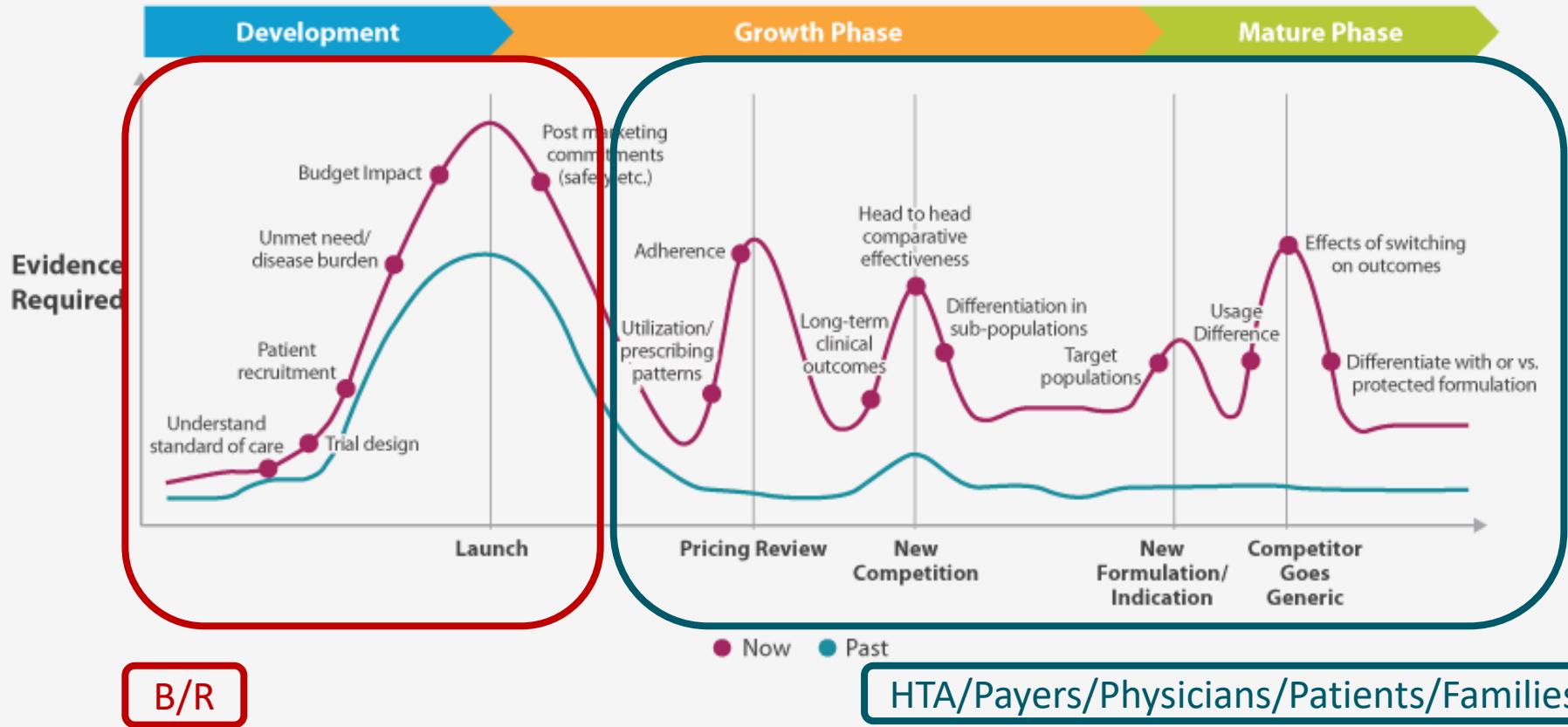


Emerging scenario

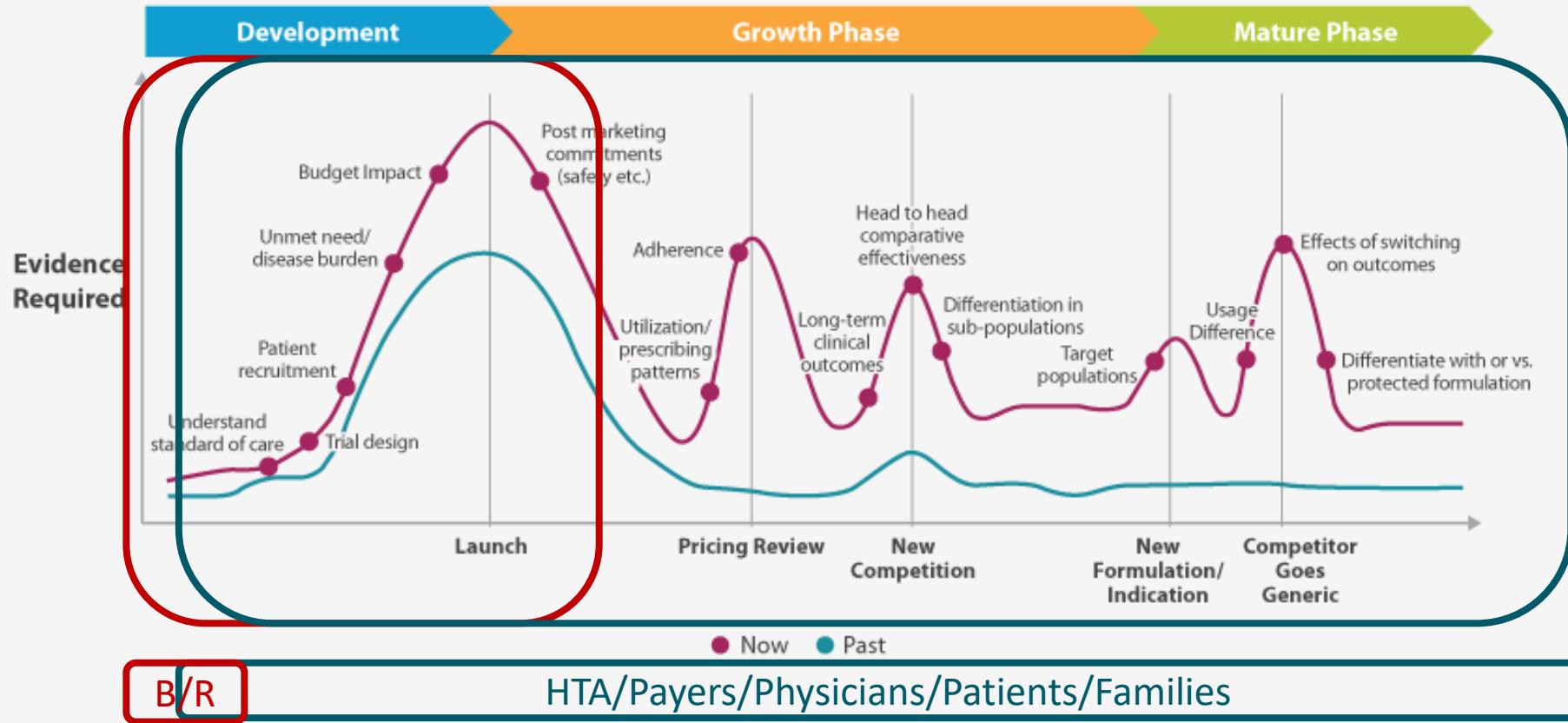


B/R

RWE Intensifying Across Product Lifecycle



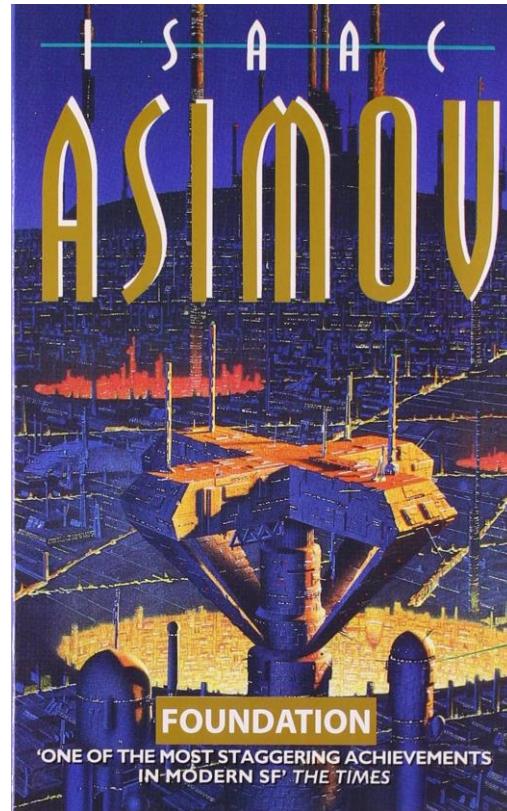
RWE Intensifying Across Product Lifecycle





**How do you want it - the crystal mumbo jumbo
or statistical probability?**

www.sciencecartoonsplus.com

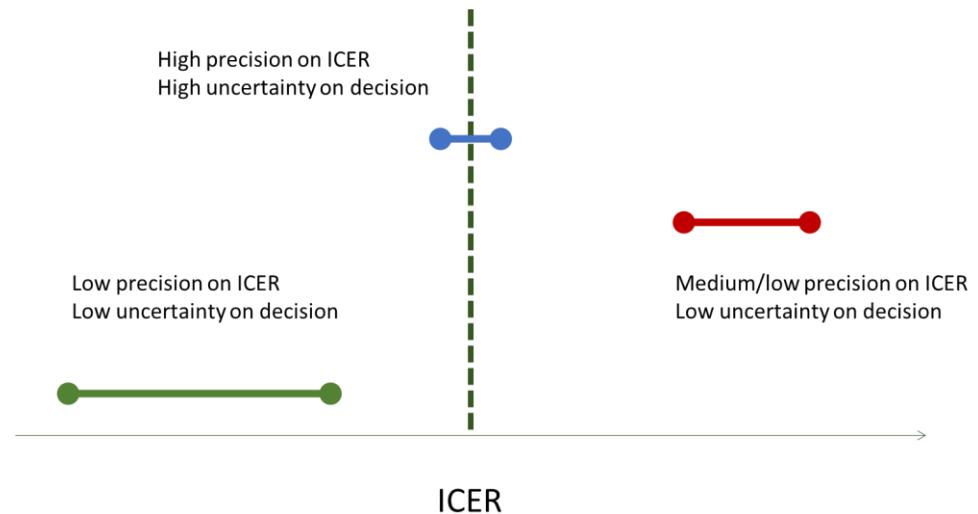


Hari Seldon: Mathematicians Predict
the Future With Data From the Past

Poor prediction = Risk avoidance



- Risks also accumulate!
- Don't mistake uncertainty in evidence with uncertainty in the decision making



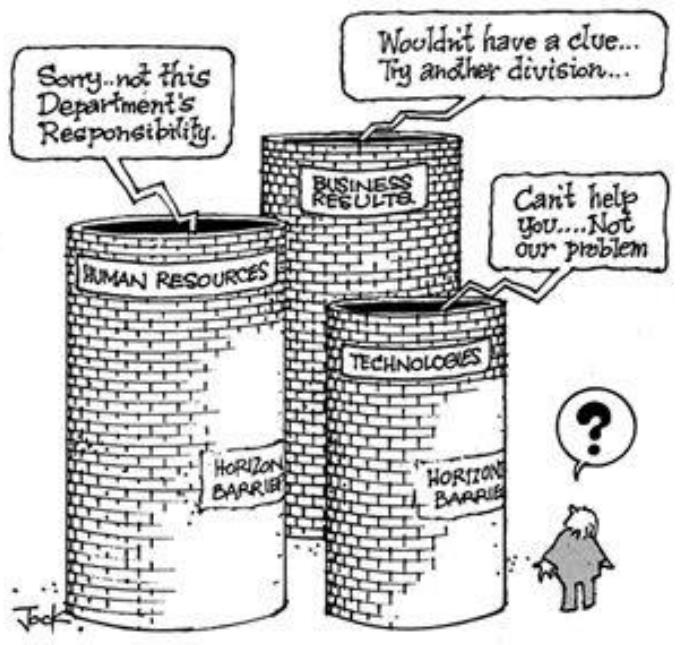
You now probably talk to ‘someone’ and ask...

- *Should we develop this further?*
 - Is this happening?
 - Probably not enough, even though we have tools such as JSC’s.

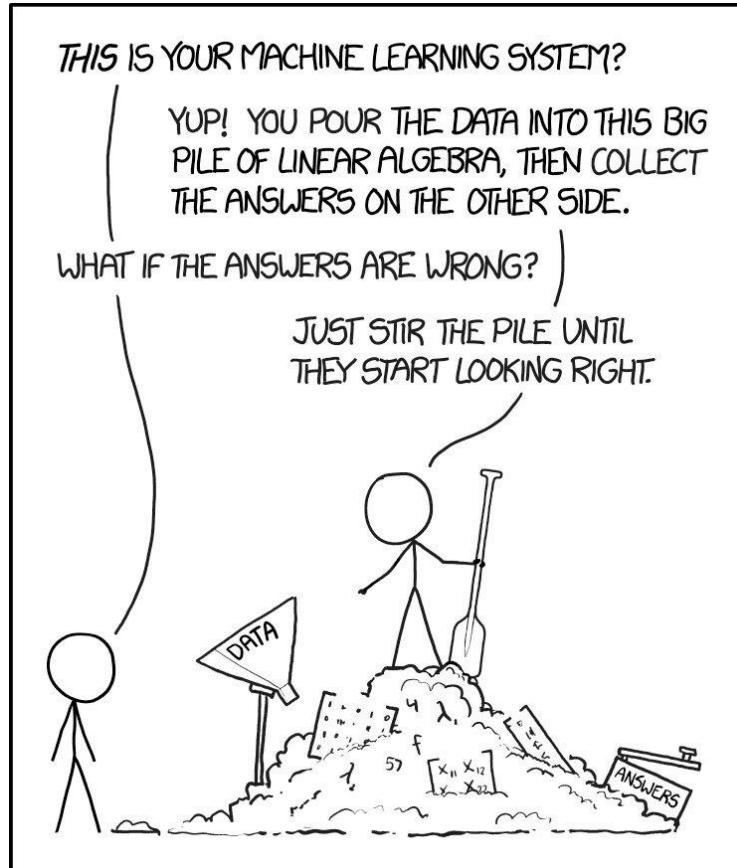
You now probably talk to ‘someone’ and ask...

- *Should we develop this further?*
 - Is this happening?
 - Probably not enough, even though we have tools such as JSC’s.
 - Investing in JSC’s is investing into better submissions and saving time during the assessment!
 - It is not about alignment but about generating the right evidence to answer the question -> this is not always/only a RCT!

You need to start non-linear thinking!



Usually I watch my language.....



I will effectively
communicate with others.

I will effectively
communicate with others.

I will effectively
communicate with others.



Follow us



@legemiddelinfo



legemiddelverket

noma.no



Norwegian
Medicines Agency