Response

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The Department may, at its discretion, publish part or all of the information provided in your submission on the Department's website or in related documents. If information from your submission is published, the Department may identify you and/or your organisation as the author of the submission. All personal contact details will be removed prior to publishing.

Please publish my submission anonymously (personal and organisational names will be removed and the submission will be marked as '"Name withheld') (Note: if you select this option and your submission contains identifying information, your submission may not be published).

3

What is your name?

████████

7

Please select the type of individual(s) or organisation(s) you represent. Please select all that apply. - Selected Choice

███████████████████

8.1

What is the name of your organisation? - My organisation is called: - Text

██████████

9

Are you making feedback on behalf or your organisation?

█████████

13

Please select which chapter/s you would like to provide feedback on. You may provide feedback on as many or few chapters as you wish.

1. Transparency, communication, and stakeholder involvement in HTA,5. Futureproofing Australia's systems and processes

14

Please select the topics within the chapter(s) you would like to provide feedback on. 1. Transparency, communication and stakeholder involvement in HTA

1.1. Transparency and communication of HTA pathways, processes and decisions,1.2. Consumer, clinician and other stakeholder engagement and consideration in HTA

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Please select the topics within the chapter(s) you would like to provide feedback on. 5. Futureproofing our systems and processes

5.1. Proactively addressing areas of unmet clinical need and gaps in the PBS,5.2. Establishment of horizon scanning programs to address specific informational needs within HTA and the health system,5.4. Mechanisms for continuous review and improvement

21

Taking all Options within this section: 1.1. Transparency, communication and stakeholder involvement in HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

Address some but not most of the issue(s)

22

If you would like to expand on your answer above you can do so below:

There is a need to address how consumers will be pro-actively engaged at all stages that is NOT reliant on the consumer having to monitor and keep track of PBAC submissions and meeting, not having to constantly monitor websites etc. for deadlines and information.

The system needs to be proactive in its engagement with consumers - providing real time alerts direct to consumers, via social media and advertising mechanism and utilising consumer focussed not for profit organisations to ensure consumers are provided with ample time to provide well considered, thoughtful and meaningful input that adds signficant value to the HTA pathways, processes and decisions.

Ensuring transparent communication is TIMELY is critical - time frames requiring considered responses that are a matter of days or a few weeks are not supportive of ensuring active engagement and contributions from consumers.

Alternatives also need to be explored as to those who do not have access to web based services - ensuring equity of access necessarily requires more than a singular mechanism through which information can be accessed and input can be given.

Ensuring clear reasoning behind decision making that is easy to understand and succinctly and clearly articulated is absolutely essential - in more than one language.

23.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Publish plain language summaries

Positive

23.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Improvements to the HTA webpage including development of a dashboard

Positive

25

If you would like to expand on your answer above you can do so below -Publish plain language summaries

Plain language is essential to consumer understanding of health matters but it is also essential that consumers health literacy is increased and that have access to detailed information that will assist with this. Clear, concise language accurately reflecting reasoning, decision and actions that organisations ██████████████ can utilise to better inform consumers will naturally support other activities to increase consumer health literacy.

27

Taking all Options within this section: 1.2. Consumer, clinician and other stakeholder engagement and consideration in HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

Mostly address the issue(s)

28

If you would like to expand on your answer above you can do so below:

The solutions proposed, if implemented well with on-going review and assessment of impact would signficantly enhance consumer involvement and engagement with HTA.

The critical aspect of these solutions will be their effective implementation and ensuring multiple access points for productive engagement by consumers.

Timely engagement will also play a critical role in effectiveness and impact. Allowing consumers to be a driving force in engagement on matters dealt with by HTA that impacts THEIR health and wellbeing must be the foundation for all engagement activities.

Consumers are no longer an outsider peering in whilst qualified health care professionals and experts make decisions about thier health journey - they are the drivers of their health and wellbeing and as such make a signficant contribution to decisions made by governments in terms of treatments and health management.

29.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Develop an engagement framework

Positive

29.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Strengthen consumer evidence

Very positive

31

If you would like to expand on your answer above you can do so below -Develop an engagement framework

Development of a framework is the first step - it is the implementation, monitoring, assessment and evolution of these frameworks that is critical to ensuring they deliver positive outcomes and have signficant impact in terms of improving individual and collective health and wellbeing.

32

If you would like to expand on your answer above you can do so below -Strengthen consumer evidence

The proposed strategies if implemented well and permitted to evolve will contribute to strengthening consumer engagement and evidence in HTA processes.

131

Taking all Options within this section: 5.1. Proactively addressing areas of unmet clinical need and gaps in the PBS into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

Address some but not most of the issue(s)

132

If you would like to expand on your answer above you can do so below:

Unmet clinical need is a difficult area to assess given the many and varied competing priorities. Any priority list must be developed based on a clearly established and agreed set of criteria that accurately reflect how unmet need is viewed - by consumers, by clinicians, by industry, by organisations including not for profits and by the government.

Horizon scanning must be an instrinsic mechanism built in to the work of the HTA NOT an after thought. How the horizon sanning is conducted and what it identifies needs to be clearly presented in a timely manner so that all stakeholders are aware of potential promising therapies.

How promising therapies are assessed and prioritised must be transparently and clearly communicated with easy to understand information relating to decision making processes.

Once a promising therapy has been identified and assessed supporting its prioritisation through additional incentives would be supported ONLY if the clinical evidence supports the use of such therapies.

Consideration also needs to be given to the application of promising therapies to more than one health priority area - confining a therapy that has multiple applications of impact and benefit across multiple health conditions must form part of assessment processes.

133.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Development of a priority list

Positive

133.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Identifying therapies to meet priority list (horizon scanning)

Positive

133.3

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Early assessment and prioritisation of potentially promising therapies

Positive

133.4

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Proactive submission invitation and incentivisation

Positive

133.5

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Early PICO scoping

Positive

140

Taking all Options within this section: 5.2. Establishment of horizon scanning programs to address specific informational needs within HTA and the health system into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

Address some but not most of the issue(s)

141

If you would like to expand on your answer above you can do so below:

The solutions proposed appear to lack avenues through which consumers can actively engage in this horizon scanning process.

Once again, and based on initial comments, consumers should be involved in every aspect of assessment particularly when discussing programs to address specific information needs within the HTA and the health system.

Further work needs to be done on this solution to better articulate how consumers and consumer focussed organisations (not for profits) will be actively engaged as relevant stakeholders to support forward planning and priority setting.

Consumers, particularly those with high health literacy, are often the people who have advanced knowledge of disruptive and advanced therapies. The HTA must seek every opportunity to allow for consumer engagement and contribution to identifying and prioritising these therapies.

142.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Horizon scanning for advanced therapies (including high cost, HSTs funded through the NHRA) and other potentially disruptive technologies

Positive

142.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Horizon Scanning to meet priority areas (including addressing equity and HUCN)

Positive

142.3

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Horizon Scanning to help operational and capacity planning for HTA and health systems

Positive

152

Taking all Options within this section: 5.4. Mechanisms for continuous review and improvement into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

Address little or none of the issue(s)

153

If you would like to expand on your answer above you can do so below:

The solution proposed appears to be very limited and does not specifically address the complexities of pro-actively engaging consumers and other relevant stakeholder groups to support continuous improvement.

Guidelines that are constantly evolving with the latest information and updates must be easily accessible, easy to read and understand, relevant and timely.

Setting realistic timeframes for review including allowing adequate time horizons for stakeholder contributions must be more clearly articulated in terms of continuous review and improvement.

154.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - A program of continuous review and improvement for current HTA policies and methods

Very positive

156

If you would like to expand on your answer above you can do so below -A program of continuous review and improvement for current HTA policies and methods

As stated above, whilst continuous review and improvement is supported further work is needed on developing the mechanism that will ensure this is carried out in such a way as to ensure the greatest stakeholder input possible.

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In summary, considering all the draft reform options together:

How confident are you that the reform options (if implemented) will make health technology assessments better overall?

Somewhat confident

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If you would like to expand on your answer above you can do so below:

The Solutions put forward are a positive step forward however there appears to be signficant work needed in clearly defining HOW these solutions will be effectively implemented, monitored, assessed and evolve/improve over time.

Central to all these solution must be the consumer - building a better HTA and health system that ensures consumers are actively driving and central to their health management as well as having access to cost effective treatment and services to help support their health journey is at the absolute core of all activities that should be undertaken.

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Finally, do you have any further comments about the draft Options Paper or consultation you would like to make before submitting your feedback?

A longer period for considered feedback would have been far more beneficial