



Submission in response to the Health Technology Assessment Policy and Methods Review Consultation options paper

Introduction

The Australian Patients Association seeks to contribute to a world class, safe, effective, affordable and accessible healthcare system in Australia, which is strongly consistent with the Commonwealth's general health policies, as well as those that relate to Health Technology Assessment, and the specific goals of the review. Our focus is on the patient perspective, which we draw on through the lived experiences of those who engage through our support line and membership, and through higher level survey data regularly collected.

We have welcomed the HTA review and the underlying commitment of government to make improvements to Australia's system of assessment and approval of health technologies - to ensure our country retains its status as a first-launch country, to make changes to improve consumer/patient engagement, and to examine ways to bring safe and effective products to market as efficiently as possible.

Consultation Options paper and consumer focus

The Options paper produced provides for an extensive range of adjustments and reforms which together, provide a positive roadmap for change. The paper includes a strong focus on reforms which can increase consumer engagement and given our role as a patient organisation, we strongly welcome this focus.

The core challenge of managing competing values

We particularly recognise the challenges and competing values in administering a system which must compare relative benefits including clinical outcomes, value for money (cost-effectiveness) and the overall financial impact of a health technology, and all of these within annual budget constraints. We acknowledge that reforms cannot assume an open-ended financial commitment of government and must remain cognizant of the challenges of budget limitations. We strongly support proposals to reduce uncertainty in these areas, making improvements to the assessment of these competing values.

Consolidation of HTA

The Reference Committee considered that recommending wholesale consolidation of health technology funding in Australia as beyond its scope. However, it recognised that the assessment functions could be consolidate and that there are benefits in doing so.

We agree that a national HTA pathway for all health technology evaluation should be developed over the medium to long term, and recommend that the government commence this process.

Mechanism for patient/consumer involvement – the Consumer engagement framework

The consultation options paper rightly notes that "The involvement of consumers and clinicians earlier and more consistently and formally throughout the HTA pathway would improve the performance and person-centeredness of the HTA system.

The most critical aspect of an effective process for ongoing patient/consumer engagement in the HTA process, is the establishment of a Patient/Consumer engagement framework. The Discussion options paper outlines a strong approach to this framework which covers all the key areas, and we support the establishment of this framework.

Critically important to the ongoing process of consumer/patient engagement, is the drawing of patient views and data from a variety of sources, rather than necessarily professional consumer advocates.

We join other consumer groups in proposing that Patient/Consumer engagement to be legislated in HTA, and that expanded consumer support be established.

We further propose that this support be extended to the variety of sources that can be drawn upon to establish a range of patient/consumer evidence and input, rather than through a centralised source.

Consumer/patient group involvement vs general public awareness.

While the proposed additional consumer/patient involvement will deliver the consumer/patient perspective into the process, (and this may be the only goal) it does not ensure greater overall public awareness and general public literacy of the HTA process. Patient/consumer groups are well placed to provide good quality information into the process and from different patient/consumer perspectives: i.e. utilising lived-experience information, policy perspectives from their own patient/consumer enquiries, and higher-level population survey data such as that produced by the APA. However, patient/consumer groups do not yet in themselves have the extensive national reach needed to inform large proportions of the population. If the government seeks a stronger general public understanding of HTA processes, this should be seen as different to the concept of greater patient/consumer engagement in the HTA process.

Response to key areas of the discussion paper

1. Transparency, communication, and stakeholder involvement in HTA

This area is from a patient/consumer perspective, the most important. As our previous paper outlined, in general terms, consumer/patient input can occur in a variety of ways and through different sources, and it is important to draw on these various sources throughout the HTA process. We are in general agreement about the issues raised and outlined in the consultation options paper, and the recommendations.

1.1 Transparency and communication of HTA pathways, processes and decisions.

We agree with the recommendations outlined.

1.2 Consumer, clinician and other stakeholder engagement and consideration in HTA

We agree with the recommendations outlined, with a particular focus on the development of a patient/consumer engagement framework.

We further propose that under ‘Strengthen consumer evidence 1.d.’ that methods to collate patient perspectives are designed to come from a variety of sources rather than one central source, including:

- *Lived-experience input specific to the illness/disease associated with health technology being considered;*

- *Policy perspectives from patient groups*
- *Higher level survey work similar to the type conducted by the Australian Patients Association.*

1.3 First Nations people involvement and consideration in HTA

We agree with the recommendations outlined.

1.4 State and territory government collaboration in HTA

We agree with the recommendations outlined, with a strong focus on and prioritisation of the following:

- *Prioritise and expedite the development and implementation of a nationally cohesive approach to HTA as outlined in Schedule C of the 2020-25 National Health Reform Agreement (NHRA) Addendum.*
- *Horizon scanning to facilitate timely planning and preparation for adoption by jurisdictions ahead of TGA application being lodged by the sponsor (see horizon scanning below)*
- *For potentially disruptive technologies, consideration of implementation requirements and initial implementation planning should occur simultaneously to the HTA with stakeholders encouraged to identify requirements for implementation within their HTA submissions...*

2. Health technology funding and assessment pathways

We agree with the recommendations outlined, with a particular focus on and prioritisation of the following:

2.1 Section 4 Unified HTA pathway for all health technologies with Commonwealth funding

All areas of 2.2 Proportionate appraisal pathways: Development of pathways to calibrate the level of appraisal required for HTA submissions to the level of risk (levels of uncertainty and potential fiscal impact) and clinical need that the submission represents.

2.2 part 4: *Alternative options 1-4. We are unable to comment on this from a well-informed enough position.*

3. Methods for HTA for Australian Government Subsidy (technical methods)

We agree with the recommendations outlined with a particular focus on the following:

3.1 Determination of the Population, intervention, Comparator, Outcome (comparator is also addressed under economic evaluation)

- *Increased early stakeholder input*
- *Increased transparency for stakeholders*
- *Updated guidance*

4. Health technology funding and purchasing approaches and managing uncertainty

We agree with the proposals outlined with a particular focus on the following:

4.1 Approaches to funding or purchasing new health technologies:

- *Recognising competition between new health technologies that deliver similar outcomes. We support Alternative Option 1.*

5. Futureproofing Australia's systems and processes

We agree with the recommendations outlined with a particular focus on the following:

- *Review of PICO process and early PICO scoping;*
- *Establishment of horizon scanning programs to address specific informational needs within HTA and the health system;*
- *Mechanisms for continuous review and improvement.*

Summary comment

The underlying driver for this review (timing/efficiency of bringing Health technologies to market to ensure our system remains high quality) has provided the opportunity to examine new ways in which patients/consumers can contribute positively to the assessment process. Through its discussion options paper, the government has demonstrated a powerful commitment to consumer engagement and has listened to the earlier consultation process.

At the heart of this, a strong patient/consumer engagement framework will contribute to a more robust and patient/consumer response system. In creating this framework, efforts must be made to ensure that the engagement process facilitates good and timely outcomes in the system rather than slows them.

It is our view that too often, patient/consumer processes across health and human services are designed by creating limited consultation points with professional consumer advocates. As a patient-centred organisation which draws its information from large scale surveys as well as individuals lived experience, our experience is that one of the great values that patients can bring to processes like HTA are their richly diverse views. We believe that the system is best served by creating mechanisms to capture that richness and diversity. This could be expressed in the Consumer engagement framework for HTA by drawing on views from a range of sources that move across the scale of individual lived experience, skilled consumer policy professionals, and higher-level patient surveys.

We appreciate the opportunity to comment and look forward to any further input we can provide.