

Response
2 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. Yes, I consent to my identified submission being published
3 What is your name? Lynne Madden
7 Please select the type of individual(s) or organisation(s) you represent. Please select all that apply. - Selected Choice University or research sector
8.1 What is the name of your organisation? - My organisation is called: - Text The University of Notre Dame Australia
9 Are you making feedback on behalf of your organisation? Yourself
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. 5. Futureproofing Australia's systems and processes
18 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,5.3. Consideration of environmental impacts in the HTA,5.4. Mechanisms for continuous review and improvement,5.5. Capacity and capability of the HTA system,5.6. Strengthen international partnerships and work-sharing
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? Mostly address the issue(s)
132 If you would like to expand on your answer above you can do so below: I support this initiative. However I wonder whether the kind of companies provided fee waver should be considered. Should this be means tested in some way? Should incentivization be linked to the urgency of the situation? Throughout all of these processes ensuring that the carbon emissions and waste associated with these products should happen up front.
133.1 If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Development of a priority list Very 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) Very 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 Neutral
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? Completely address the issue(s)
141 If you would like to expand on your answer above you can do so below: This seemed like a considered approach. I consider that all steps should be considering the carbon emissions of these products. If the carbon footprint is excessive that may be the trigger for halting the whole process.
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) Very 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 Very positive
144 If you would like to expand on your answer above you can do so below -Horizon scanning for advanced therapies (including high cost, HSTs funded through the NHRA) and other potentially disruptive technologies The structured scanning process seemed robust. Good that it included a method to measure and evaluate the success.
145 If you would like to expand on your answer above you can do so below -Horizon Scanning to meet priority areas (including addressing equity and HUCN) I thought that it was a good idea to form international collaborations with trusted groups with similar value systems.
146 If you would like to expand on your answer above you can do so below -Horizon Scanning to help operational and capacity planning for HTA and health systems Again I thought that including a capacity to measure and evaluate this was good.
147 Taking all Options within this section: 5.3. Consideration of environmental impacts in the HTA into account. Overall, to what extent could the options (if implemented) address the issues that relate to them? Mostly address the issue(s)
148 If you would like to expand on your answer above you can do so below: Healthcare in Australia has a very large carbon and waste footprint. I teach a course on the environmental sustainability of health care and Healthcare systems and the healthcare workers who attend this are deeply concerned about the carbon and waste footprints of their practice. While as individuals they can support and help drive change locally - the scale of the issue requires system level solutions. An individual pharmacist in a country hospital has only so much influence on the carbon footprint of inhalers. We need change at pace and scale if we are to meet national targets for containing carbon emissions. This is an essential development described in this section.
149.1 If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Environmental impact reporting Very positive
151 Environmental impact reporting Reporting greenhouse gas emissions is essential. Both benefits described on page 159 of the review document are very important. The example for the inhalers is excellent. Having international alignment is essential. We all have scare resources and with agreed approaches resources can be combined. The companies producing these products are international companies and we need an international and consistent response to them.
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? Don't know
153 If you would like to expand on your answer above you can do so below: The PBS and the PBAC are very important structures in Australia and have provided the Australian population with an amazing service. These are very important groups now in helping us to address climate change and bringing to the table the carbon emission profile of the drugs that Australian use. Any process that strengthens the capacity and resourcing of the PBAC and the PBS should be endorsed. I would like to take the opportunity to express my thanks to all the all the people who have served on the PBAC.
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 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 once again for any process of change it is important to measure and monitor the outcomes. It will be important that such a process is adequately resourced.
157 Taking all Options within this section: 5.5. Capacity and capability of the HTA system into account. Overall, to what extent could the options (if implemented) address the issues that relate to them? Mostly address the issue(s)
158 If you would like to expand on your answer above you can do so below: Strongly agree that we need greater capacity in health economics. We also need greater capacity to be able to do environmental assessments of all technologies and indeed all models of care. We dont have the skills in the current workforce to do this. The capacity to respond to these recommendations in this important review document will be limited by the capacity of the workforce. The internship program is potentially one small part of a response - as long as you appreciate that this measure alone will be medium to long term strategy. You might need to actively recruit people with the skills in the first instance and ramp up training across the board in segments of the health workforce.
159.1 If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Improve HTA capacity and workforce in Australia Very positive
161 If you would like to expand on your answer above you can do so below -Improve HTA capacity and workforce in Australia Without a skilled workforce it will be difficult to achieve the necessary outcomes. The need to assess these technologies from an environmental perspective is a rapidly emerging need and one that Australia must respond to. The lack of an adequate health economics workforce has been a long standing issue. The other skill that is not mentioned here is a capacity to take a systems approach to these issues. Systems thinking does not currently feature in health professional development.
162 Taking all Options within this section: 5.6. Strengthen international partnerships and work-sharing into account. Overall, to what extent could the options (if implemented) address the issues that relate to them? Completely address the issue(s)
163 If you would like to expand on your answer above you can do so below:

International partnerships with trusted countries and organisations that share our values provide an opportunity to combine scarce resources. There are also risks if the countries or groups are too closely aligned with the private sector. So some process of screening and regular review of international partnerships is required.

164.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Harmonisation of HTA evaluations

Very positive

164.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Work sharing for individual submissions

Very positive

164.3

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Collaboration with international jurisdictions to deliver sustainable access to health technologies

Very positive

166

If you would like to expand on your answer above you can do so below -Harmonisation of HTA evaluations

Interagency working requires resourcing to be successful. These measures must be adequately resourced to obtain full benefit.

167

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?

Very confident

168

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

As already mentioned, it is essential that we address the environmental impact of health technologies of all forms at a system level in Australia. This includes broadening our approach through international alignments of ways to measure and monitor these impacts. It is impossible for individual health services and health workers to achieve what can be potentially achieved much more efficiently and effectively at a national level. Thank you

170

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

Thank you for the opportunity. It was a very short window of opportunity to respond at this stage

229

If you would like to expand on your answer above you can do so below -Work sharing for individual submissions

The literature and experience of workforce and researcher capacity building strongly supports the value of international partnerships. These are beneficial to the organization and to the individual. To the organisation because they strengthen capacity within the unit, widen the potential pool for recruitment and enrich research processes. For the individual they enrich their networks, potentially expand their understanding and thinking and broaden long term employment opportunities.

230

If you would like to expand on your answer above you can do so below -Collaboration with international jurisdictions to deliver sustainable access to health technologies

As mentioned already in my submission - the companies that we are dealing with here as a country are international companies with very, very large capacities. It makes sense that countries have a uniform approach to them and to measuring, such as measuring carbon emissions.

251

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

I think that the effectiveness of this should be measured and monitored to identify how this approach is strengthening our capacity. As I said above including measuring the environmental footprint of these technologies should be an early part of the assessment.

252

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Only to emphasise the importance of measuring the environmental impact as part of the horizon scanning process

253

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

I support that and consider that the sooner that this can be introduced the better.

254

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Thanks to the PBAC

255

If you would like to expand on your answer above you can do so below -Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

As mentioned above - we need to increase our capacity to take a systems approach to these important and complex issues. These are skills that can be developed in people however there are few opportunities for people to engage with this learning.

256

Thank you for the opportunity to comment

256

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

NO thank you