

Response

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Yes, I consent to my identified submission being published

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What is your name?

Paul Dale

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

Industry association / Peak body

8.1

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

Medical Technology Association of Australia

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Are you making feedback on behalf of your organisation?

Your organisation

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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,2. Health technology funding and assessment pathways,3. Methods for HTA for Australian government subsidy (technical methods),4. Health technology funding and purchasing approaches and managing uncertainty,5. Futureproofing Australia's systems and processes

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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,1.3. First Nations people involvement and consideration in HTA,1.4. State and territory government collaboration in HTA

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Please select the topics within the chapter(s) you would like to provide feedback on. 2. Health technology funding and assessment pathways

2.1. Streamlining and aligning HTA pathways and advisory committees,2.2. Proportionate appraisal pathways

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Please select the topics within the chapter(s) you would like to provide feedback on. 3. Methods for HTA for Australian government subsidy (technical methods)

3.1. Determination of the Population, Intervention, Comparator, Outcome,3.2. Clinical Evaluation Methods,3.3. Economic evaluation

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Please select the topics within the chapter(s) you would like to provide feedback on. 4. Health Technology funding and purchasing mechanisms and decisions

4.1. Approaches to funding or purchasing new health technologies,4.2. Approaches to incentivise development of products that address antimicrobial resistance (AMR),4.3. Understanding the performance of health technologies in practice

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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,5.3. 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

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?

Mostly address the issue(s)

23.1

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

Neutral

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 summaries are already available for PBAC and MSAC decisions. Unclear what this adds

26

If you would like to expand on your answer above you can do so below -Improvements to the HTA webpage including development of a dashboard

Ratings above assumes it is applied to applications for new MedTech (including diagnostics) through MSAC

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:

Depends on the practical steps to implement these. Need to ensure it actually makes a practical difference to improving consumer inputs and does not overburden/delay the process

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

Positive

33

Taking all Options within this section: 1.3. First Nations people involvement 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)

34

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

Need to ensure it actually makes a practical difference to improving First Nation inputs and does not overburden/delay the process

35.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - First Nations peoples partnership in decision making

Positive

35.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Dedicated resource for HTA submissions and education

Positive

37

If you would like to expand on your answer above you can do so below -First Nations peoples partnership in decision making

Having pre-established accessible information about specific needs for First Nations populations will make it easier for sponsors to tailor submissions

39

Taking all Options within this section: 1.4. State and territory government collaboration 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)

41.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Development of central standardised data sharing system for utilisation and outcome data

Positive

41.2

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Increase opportunities for consultation and work sharing

Neutral

41.3

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Health technologies that are jointly funded by the Commonwealth and state and territory governments (such as high cost, Highly Specialised Therapies (HSTs) delivered to public hospital inpatients)

Positive

43

If you would like to expand on your answer above you can do so below -Development of central standardised data sharing system for utilisation and outcome data

This is welcome especially for better generation of RWD. The data needs to be accessible to industry and other stakeholders making submissions

44

If you would like to expand on your answer above you can do so below -Increase opportunities for consultation and work sharing

In theory this is good but the consultation process must not sacrifice speed to access

45

If you would like to expand on your answer above you can do so below -Health technologies that are jointly funded by the Commonwealth and state and territory governments (such as high cost, Highly Specialised Therapies (HSTs) delivered to public hospital inpatients)

In theory this is good but the consultation process must not sacrifice speed to access

46

Taking all Options within this section: 2.1. Streamlining and aligning HTA pathways and advisory committees into account.

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

Don't know

47

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

The impact of some of these proposals is unclear particularly on the MedTech industry. It is highly inappropriate that this foundational issue about HTA processes is being reviewed completely without MedTech (including digital health) in the terms of reference. This makes it more difficult to judge.

48.1

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Pathway for drugs for ultra-rare diseases (Life Saving Drugs Program (LSDP))

Neutral

48.2

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

Neutral

48.3

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Expanding role of PBAC

Neutral

48.4

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Unified HTA pathway for all health technologies with Commonwealth funding

Don't know

61

If you would like to expand on your answer above you can do so below -Expanding role of PBAC

No comment, assuming this will mostly not incorporate MedTech, with the exception of co-dependent diagnostics

62

If you would like to expand on your answer above you can do so below -Unified HTA pathway for all health technologies with Commonwealth funding

This could have positives as well as negatives for MedTech access. The fragmentation of the current HTA processes and the resulting confusion is clearly a problem in many cases and the proposal to unite the processes is the obvious solution to this. However, this would mean the same committee is considering all technologies and the risk of gravitating to the default "pharmaceutical standard" remain significant. Furthermore, unifying the HTA process doesn't solve the funding gap as now with MSAC, the committee may recommend the device but have no way to fund it (see for example pressure wires in fractional flow reserve. There are also no pathways to fund digital applications prescribed by clinicians as there is now in some other developed countries).

63

Taking all Options within this section: 2.2. Proportionate appraisal pathways 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)

64

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

At present this is written as though none of this is being applied to MSAC or MedTech. Ratings given for individual proposals assume it is applied more broadly to HTA outside PBAC/PBS. However, overall rating reflects this uncertainty.

65.1

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

Positive

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

Positive

65.2