



Adjunct Professor Debora Picone AO
Chair
Health Technology Assessment Policy and Methods Review
Consultation 2 – Options Paper
htareviewconsult@health.gov.au

Dear Adjunct Professor Picone

Deba

National Blood Authority Submission to HTA Policy and Methods Review – Options Paper

Thank you for the opportunity for the National Blood Authority (NBA) to participate in the second consultation round for the Health Technology Assessment (HTA) Policy and Methods Review.

Background on the NBA

The NBA is a statutory agency established under the *National Blood Authority Act 2003* (the Act). This legislation was preceded by the National Blood Agreement (the Agreement) signed by all Australian Health Ministers in 2002. The Agreement implements a coordinated national approach to policy setting, governance and management of the Australian blood sector.

The primary policy objectives of the Agreement are to:

- provide an adequate, safe, secure, and affordable supply of blood products, blood-related products, and blood-related services in Australia
- promote safe, high-quality management and use of blood products, blood-related products, and blood-related services in Australia.

Under the Agreement, blood and blood products are provided at no direct cost to patients and are funded 63% by the Commonwealth and 37% by the states and territories.

The Agreement describes the process for determining which products are supplied at no cost to patients through the National Product Price List (NPPL), which must be agreed to by all state and territory governments. Where appropriate, a product being considered for inclusion on the NPPL may be referred to the Medical Services Advisory Committee (MSAC) for HTA to provide additional technical and economic analysis.

In response to the HTA Policy and Methods Review's Options Paper published on 25 January 2024, the NBA has prepared some observations for consideration during the current consultation round.

Health technology funding and assessment pathways

The NBA welcomes the proposal to create a simplified single-entry HTA pathway (Option 2.1: *Streamlining and aligning HTA pathways and advisory committees*) to create a nationally consistent HTA approach. The NBA believes that a streamlined approach to all health technology evaluations based on technology rather than funding pathway will create significant efficiencies in the assessment pathway and ultimately benefit patients, governments and potential suppliers.

The NBA also considers it would be valuable for applicants to have direct access to the assessment pathway without being limited and delayed by other processes and committees. This would better support a proper, evidence-based assessment of new products and informed decision-making.

The NBA also considers that recommendations from assessment processes that relate to blood and blood products should be advisory and not excessively prescriptive in terms of how contractual and pricing outcomes might be best achieved. In the case of blood products, a unified assessment process would need to recognise existing statutory and legal obligations and requirements, as well as the requirements set out in the *National Blood Authority Act 2023* and the National Blood Agreement. While these could be amended by government if required, in the absence of this, a committee that evaluates blood products should not overreach into the roles and responsibilities of the NBA that are currently prescribed by legislation.

Thank you again for the opportunity to provide a response on behalf of the NBA. If there is any further information or advice required, I would be very pleased to assist.

Your sincerely



John Cahill
Chief Executive

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