

Response

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Yes, I consent to my identified submission being published

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What is your name?

Penny Lovell

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

Pharmaceutical / Medical technology company

8.1

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

UCB Australia Pty Ltd

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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

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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)

22

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

Clarification should be provided on how stakeholders would be incentivised to participate in HTA processes.

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

Neutral

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 pharmaceutical industry should be participant in the development of the framework.

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

31

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

We support the development of a consumer engagement framework to ensure that the voices of those directly impacted by the technology are part of the decision-making process. We hope this will lead to health technology assessments that reflect real-world needs and priorities, and equitable outcomes. Consumer input can also reveal practical considerations often missed by technical experts, such as usability, accessibility, and potential social impacts. In the final options paper, the pharmaceutical industry should be identified as a stakeholder who should an active role in the co-design of this framework as we have many insights to share from our technical experience in clinical trials and compassionate access programs.

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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?

Address some but not most of the issue(s)

34

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

We strongly support equitable outcomes as a pillar of the Options paper with the inclusion of First Nations people's involvement in HTA. We would have also liked a stronger call-out to other marginalised groups including those with rare or ultra rare conditions.

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

Neutral

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

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)

40

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

We fully support a nationally cohesive approach to HTA for technologies. While the proposed options seem to work towards this goal, the proposals could be strengthened by removing the Federal/State Government co-funded model to have sole Commonwealth funding, with centralised HTA. This would ensure equity between Australia's States and Territories, rather than 'postcode lotteries'. Collaboration with states and territories will continue to be important for these products in order to ensure timely and coordinated implementation.

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

Positive

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)

Negative

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?

Address some but not most of the issue(s)

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))

Don't know

48.2

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

Positive

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

Positive

50

Pathway for drugs for ultra-rare diseases (Life Saving Drugs Program (LSDP))

The impact of this option is unclear due to the lack of specific information. While this option is welcomed in principle, more clarity on the key requirements needed to access this pathway and on the expected value for money of these therapies is needed. Similarly, the option should not change the current approach to ultra rare disease funding in terms of expected data requirements. A clarification that these drugs are not supposed to meet any predetermined cost-effectiveness thresholds should be included.

60

If you would like to expand on your answer above you can do so below -Vaccine pathway

While streamlining the pathway should be a positive approach, the final proposal needs to ensure that the future value of the vaccines is appropriately captured (i.e. reducing the discounting rate).

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)

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

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Streamlined pathway for cost-minimisation submissions (therapies not claiming a significant improvement in health outcomes or reduction in toxicity)

Don't know

65.3

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN:

Alternative option 1: Introducing an optional resolution step before HTA committee consideration

Positive

65.4

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN:

Alternative option 2: Introducing an optional resolution step before HTA committee consideration, with additional post committee resolution

Positive

65.5

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN:

Alternative option 3: Early Price negotiation

Positive

65.6

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)? - Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN:

Alternative option 4: Introducing an optional resolution step after HTA committee consideration but before advice is finalised

Negative

65.7