

# EVALUATION OF DRUGS FOR LISTING PURPOSES: A CHANGE OF APPROACH



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# INESSS: THE HTA BODY IN QUEBEC



Created in 2011, following the fusion of 3 entities

- Conseil du Médicament (drugs)
- Agence d'évaluation des technologies et des modes d'intervention en santé (technologies)
- Social services

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# INESSS: THE HTA BODY IN QUEBEC

Conseil du médicament

AETMIS

  
**MISSION**  
Social services

Promote clinical excellence and the efficient use of resources in the health and social services sector

  
**VISION**

Be the reference to inform decisions and practices

  
**VALUES**

Excellence  
Independence  
Openness  
Scientific rigour  
Transparency  
Integrity  
Equity

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Direction du médicament

Direction des services de santé et de l'évaluation des technologies

Direction des services sociaux

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# MANDATS

## Evaluates

By legislation, INESSS assesses the clinical advantages and the costs of:

- technologies,
- medications,
- interventions used in health care and personal social services.

## Recommends

It issues recommendations concerning their adoption, use and coverage by the Québec healthcare services.

## Develops

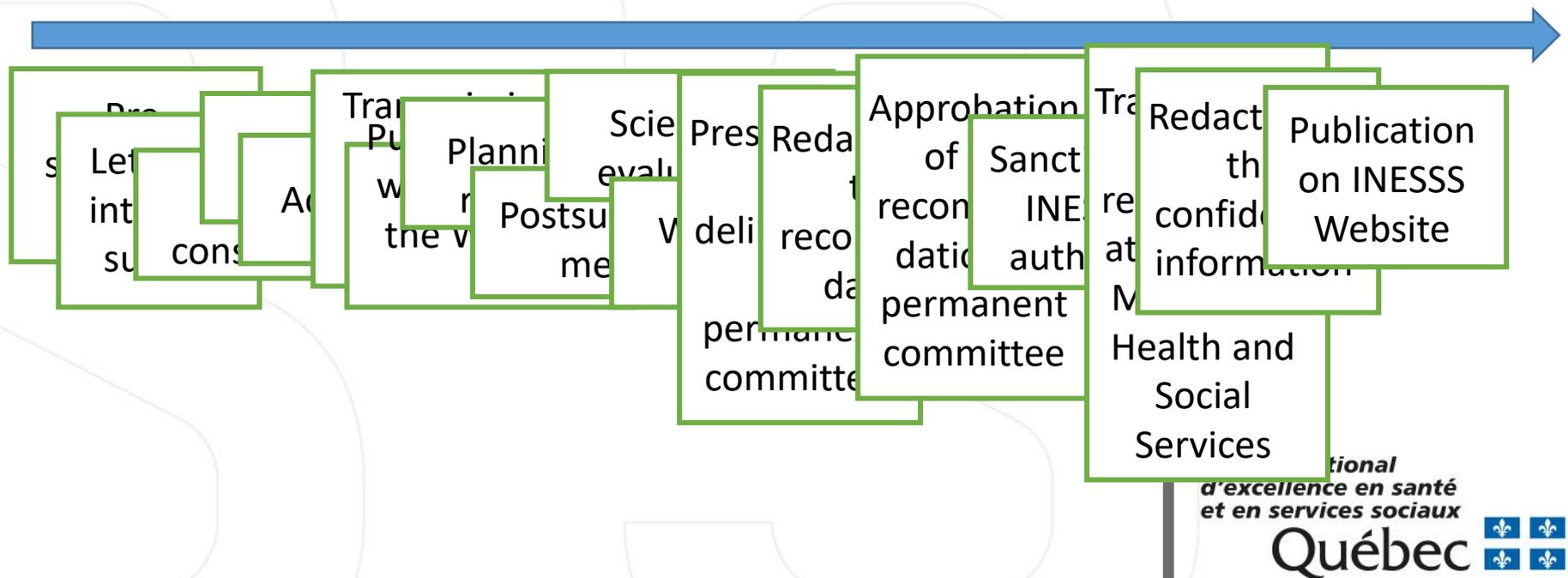
It develops guides to clinical practices in order to ensure their optimal use in the Québec healthcare services.

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# MAIN OBJECTIVES OF THE PRESENTATION

- Which changes ?
- Why were they brought?



# CONTINUOUS MODE

Before: 3 dates per year

Main reason why: faster access for patients

Submission: post-NOC

Reason for: pre-NOC-making : Quebec life sciences strategy 2017-2027

## L'INNOVATION PREND VIE

STRATÉGIE QUÉBÉCOISE  
DES SCIENCES DE LA VIE  
2017-27



Target :

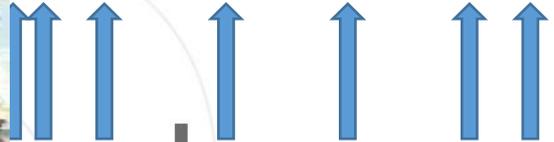
Synchronize INESSS and  
CADTH recommendations so  
the mean delay between both  
is maximum 30 days

Now: No submission deadline

Submission: pre-NOC or post-NOC

Now benefits from a faster listing in the event of a positive recommendation by INESSS

But, the downside of it:



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# PRESUBMISSION MEETING

- When: 3 to 12 months before submission
- Specific issues have to be identified by the manufacturer to justify the relevance, such as :
  - Clinical issues: uncertainty regarding clinical data (non comparative study, indirect comparison), the choice of the comparator, QoL, place of therapy, indication targeted for listing purposes, etc.
  - Economic issues: type of pharmacoeconomic analysis, budgetary impact approach, the choice of the comparator, uncertainty regarding clinical and cost inputs, data extrapolation technic, etc.
- Main objectives of the meeting:
  - To broadly present to INESSS what is in the file, what are the main data concerning the therapeutic value of the drug and what are the significant issues identified by the manufacturer;
  - To share information on the orientation they expect to take for the submission preparation;
  - To allow, when appropriate, alignments from INESSS that do not require a deep knowledge of the file.

# EXTERNAL CONSULTATION

Letter of intent by manufacturer: 2 months before submission

Allows us to start the external consultation earlier and hence, to make it last longer (7 weeks instead of the previous 4)

Picture of the symptoms of their medical condition

Gives more time to patients, associations of patients, caregivers, citizens, health professionals, clinicians, etc.

questionnaires on our Website

Fears towards their conditions

In turn, the more information that patients, caregivers and

Resource utilization required by their condition

Experience with the drug evaluated or with current treatments

Unmet need



Quality of life

Expectations and hope towards a new treatment

Daily living with the condition

understand the reality  
Values and preferences

Benefit, risks and breaches of actual treatments

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# EXTERNAL CONSULTATION

In addition to this process (letters and questionnaires), the information may also be harvested through recognized consultation methods, such as focus group or semi-directed interviews.

- Recently participated in a rewarding consultation process, with patients suffering from spinal muscular atrophy, a rare disease, and with caregivers
- Context of the consultation : Evaluation of Spinraza<sup>®</sup> for listing purposes
- Phone interviews and in person meetings were conducted by GRIMN (Groupe de recherche interdisciplinaire sur les maladies neuromusculaires), affiliated to the rehabilitation school at Université de Sherbrooke
- Those activities consisted in collecting information namely regarding the experience of patients living with the disease and, for those who were treated with Spinraza<sup>®</sup>, regarding the advantages and disadvantages of the drug

# ADMISSIBILITY PROCESS

NAME OF PRODUCT:

## CHECKLIST 1

### First request: New innovative drug or new indication – With a Health Canada notice of compliance

All the required documents must be included in the assessment request on the date it is filed in order to be considered for review. A written explanation is required for each document missing. Refer to the ["Guidance document for submitting a request to INESSS"](#) for a detailed description of the requested items. Lastly, place this completed checklist at the beginning of each submission package.

ADMINISTRATIVE SECTION	REQUIREMENT	DONE	TO FOLLOW	N/A
1. Cover letter	R	<input type="checkbox"/>		
2. Form entitled "Drug Listing Request"	R	<input type="checkbox"/>		
3. Notice of compliance issued by Health Canada	R	<input type="checkbox"/>		
4. Labels	R	<input type="checkbox"/>		
5. Authorization to share information	R	<input type="checkbox"/>		
6. Listing status in the other provinces	R	<input type="checkbox"/>		
7. Form entitled "Summary Submission Description"	R	<input type="checkbox"/>		
<b>CLINICAL SECTION</b>				
1. Clinical studies published or submitted for publication	R	<input type="checkbox"/>		
2. Appendix, supplement or erratum (if applicable)	R	<input type="checkbox"/>		<input type="checkbox"/>
3. Poster or abstract concerning the main clinical studies submitted (if applicable)	R	<input type="checkbox"/>		<input type="checkbox"/>
4. List of published and unpublished clinical studies, including those in progress	R	<input type="checkbox"/>		
5. Clinical executive summary	R	<input type="checkbox"/>		
6. Comprehensive summary – Clinical Studies section (2.7.3)	R	<input type="checkbox"/>		
7. Health Canada clinical reviewers' report	RP	<input type="checkbox"/>	<input type="checkbox"/>	
8. Official product monograph	R	<input type="checkbox"/>		
<b>ECONOMIC SECTION</b>				
1. Price justification	R	<input type="checkbox"/>		
2. Pharmacoeconomic study	R	<input type="checkbox"/>		
3. Budget impact analysis	R	<input type="checkbox"/>		
<b>OTHER INFORMATION</b>				
1. Health need	R	<input type="checkbox"/>		
2. Impact on the population's health	R	<input type="checkbox"/>		
3. Impact on the health and social services system	R	<input type="checkbox"/>		
<b>NUMBER AND TYPES OF COPIES</b>				
3 original copies	R	<input type="checkbox"/>		
2 condensed copies (4 if cancer drug)	R	<input type="checkbox"/>		
5 electronic original copies on USB sticks, including the electronic spreadsheet for the pharmacoeconomic model and that for the budget impact analysis (7 copies if cancer drug)	R	<input type="checkbox"/>		
1 hard AND 1 electronic copy of the RP documents	R	<input type="checkbox"/>		

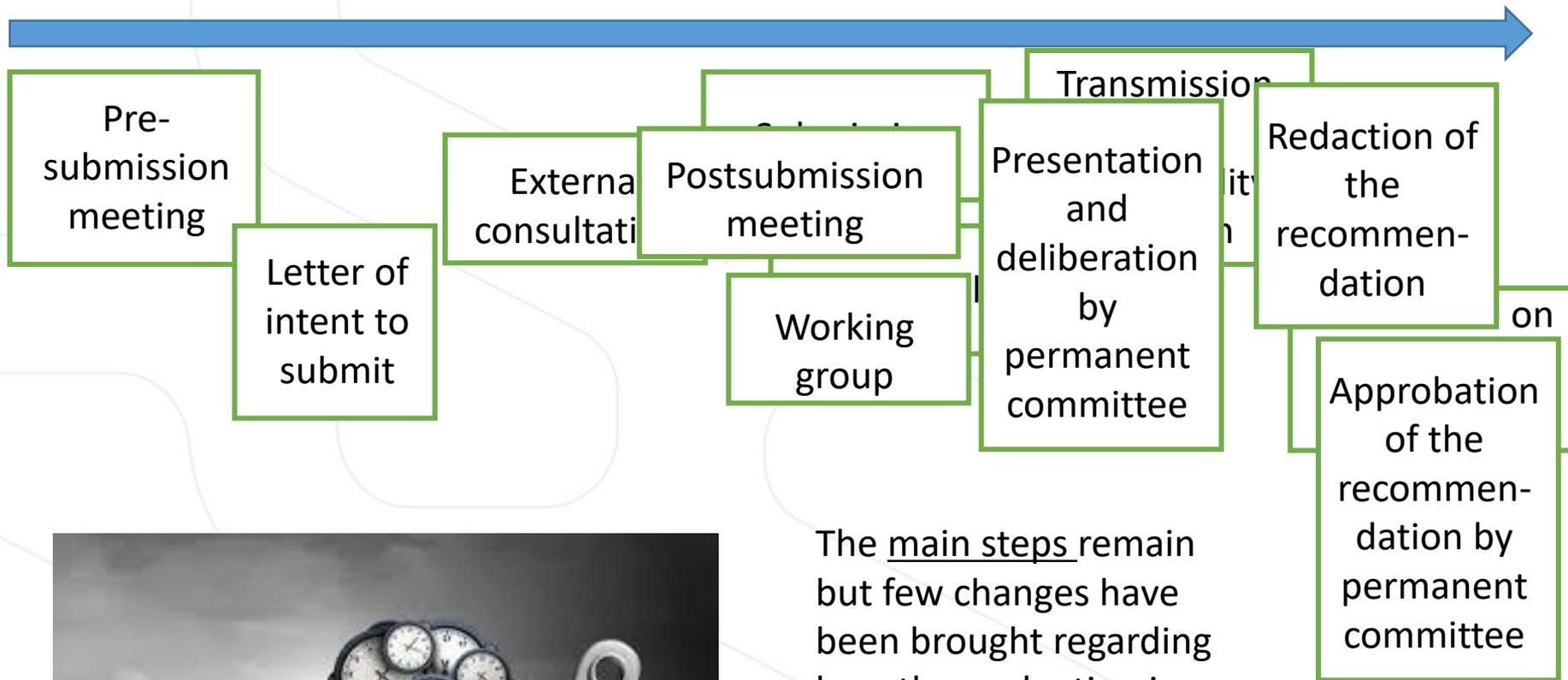
Beyond an administrative process...

To the best of our knowledge, without a scientific appreciation of the file, to ensure that all the relevant information is submitted

Examples of what:

- Service statement (180 days)
- Billing
- Complete indirect comparison
- Clinical data and statistical analysis for a subgroup
- Workable Excel file

# SCIENTIFIC EVALUATION



The main steps remain but few changes have been brought regarding how the evaluation is performed.

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# CRITERIA-BASED EVALUATIVE APPROACH

For the purpose of making its recommendations, INESSS has developed six criteria that enable it to take into account all the parameters specified in the Act:

In exercising

➤ If not estab

➤ If establish

ss the **therapeutic value** of a medication:

that effect is transmitted to the Minister

en also assessed

PARAMETERS

CRITERIA

- 1 The identification of the unmet health need in the intended patient population and the determination of the level of this need.
- 2 The drug's ability to confer a clinical benefit.
- 3 The drug's efficiency.
- 4 Level of impact of the medical condition and the drug on the health of the general population.
- 5 The drug's level of burden on the system's budget.
- 6 The system's organizational ability to offer the drug.

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4  
Impact of adding the medication to the list on the health of the population and on the other components of the health and social services system.

5  
The advisability of adding the medication to the list with regard to the purpose of the public plan<sup>3</sup>.

# CRITERIA-BASED EVALUATIVE APPROACH

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- 5 The drug's level of burden on the system's budget.
- 6 The system's organizational ability to offer the drug.

Objective:

Have a more structured evaluation process that will explicitly take into account these 6 complementary criteria

- to promote integration of the information for decision-making purposes by our permanent scientific committee
- to facilitate the presentation, and hence the comprehension, of the distinct reasons underlying the recommendation in our notices to the Minister

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# CRITERIA-BASED EVALUATIVE APPROACH

Before: patient's and clinician's perspective was presented in parameter 4 so, if the therapeutic value (parameter 1) was not established, both perspectives were not presented.

Patient's perspective: example of Radicava® (amyotrophic lateral sclerosis)

- Experience with the drug (clinical benefits but difficulty of administration, end of dose symptoms)
- Expectations: reduce their symptoms, preserve their mobility

Clinician's perspective:

- Limitations with the actual treatments
- Arrival of new molecules raises questions regarding the optimal sequence of treatment
- Possibility of retreatment with the same molecule if recurrence

The scientific literature

The diagram consists of three rounded rectangular boxes connected by lines. The first box on the left is labeled 'The scientific literature' and has a green hexagonal icon above it. A line connects this box to a second box in the middle, which is labeled 'Expert opinions' and has a green hexagonal icon above it. Another line connects the second box to a third box on the right, which is labeled 'The experience of health professionals and their caregivers' and has a blue hexagonal icon above it. The background features faint outlines of human heads.

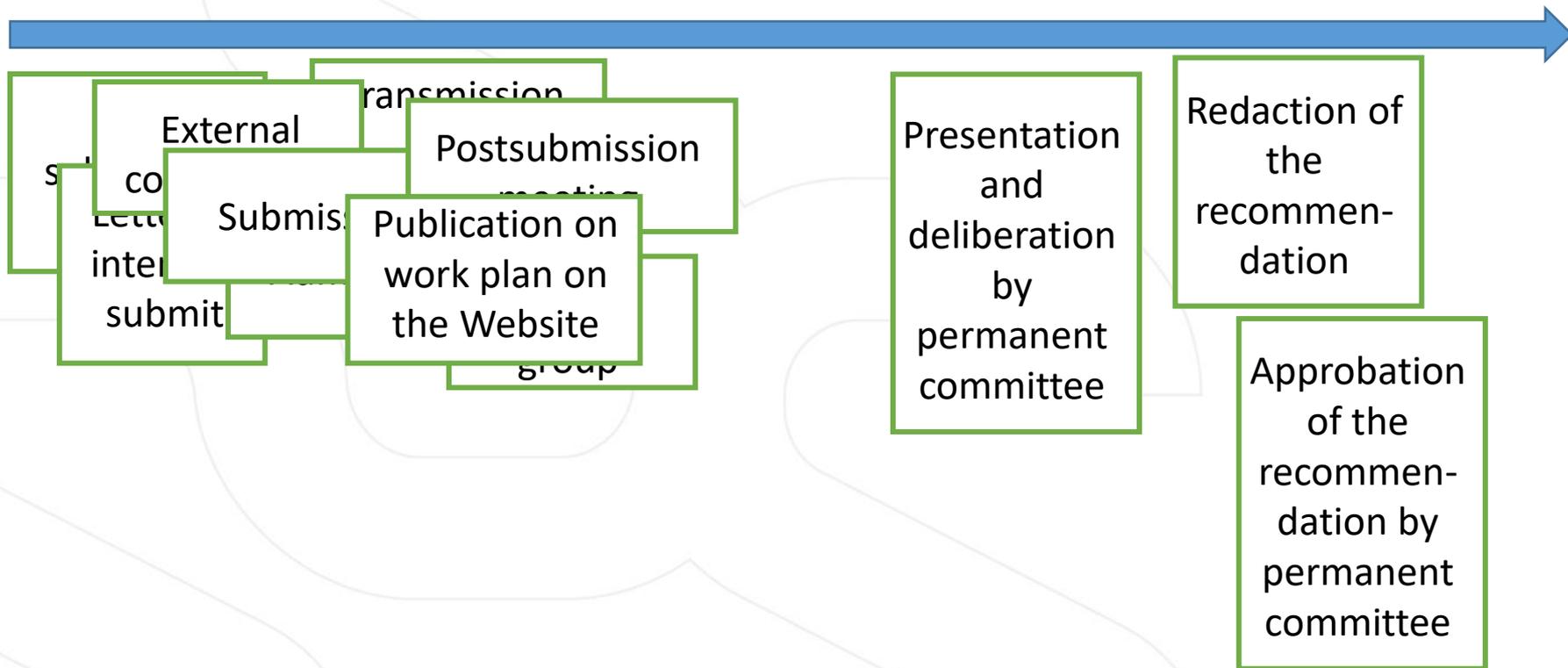
Expert  
opinions

The experience of health  
professionals  
and their caregivers

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# RECOMMENDATIONS CONCERNING THE FAIRNESS AND REASONABLENESS OF LISTING



# RECOMMENDATION CONCERNING THE FAIRNESS AND REASONABLENESS OF LISTING

Based on its overall evaluation, INESSS makes a recommendation to the Minister of Health and Social Services.

INESSS recommendation	Applicability
<b>Listing</b>	INESSS makes this recommendation when it considers the assessment of all the evaluation parameters specified in the Act favourable to listing the drug with no restrictions.
<b>Refusal to list</b>	INESSS makes this recommendation in the following situations: <ul style="list-style-type: none"><li>• When it considers that the drug's therapeutic value has not been demonstrated;</li><li>• When it considers, in particular, that the level of the patients' health need is almost nonexistent, that the level of uncertainty regarding the drug's efficiency is too high and, when applicable, that it is not advisable to negotiate a listing agreement for the drug.</li></ul>

# RECOMMENDATIONS CONCERNING THE FAIRNESS AND REASONABLENESS OF LISTING

Conditional listing	<p>INESSS makes this recommendation when it considers the assessment of all the evaluation parameters specified in the Act favourable to listing the drug only if certain conditions are met.</p>
	<p><b>POSSIBLE CONDITIONS:</b></p>
	<p><b>Exception drug</b></p> <p>INESSS suggests this condition when it considers the assessment of all the evaluation parameters specified in the Act favourable to listing of the drug with specific utilization criteria. In such case, it proposes an indication recognized for payment or utilization criteria for the drug.</p>
	<p><b>Monitoring</b></p> <p>INESSS suggests this condition in the following situations:</p> <ul style="list-style-type: none"><li>• When it considers that the drug offers a desired therapeutic value, but that additional clinical data is needed to do a re-evaluation (clinical monitoring);</li><li>• When it considers that the drug is associated with a risk of nonoptimal use and that monitoring real world data is necessary in order to do a re-evaluation (monitoring optimal use).</li></ul>

Spinraza (spinal muscular atrophy, INESSS 2019)

Galafold (Fabry disease, INESSS 2018)

Context :

- Rare or ultra-rare disease
- Poor vital and functional prognosis
- Limited clinical data and hard to obtain
- Significant unmet need

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THANK YOU

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