

# **Variations in cell therapy reimbursement across the Big5EU**

Panos Kefalas

*Head of Health Economics & Market Access*

*May 2015*

## Presentation focus

---

- Variation in pricing and reimbursement (P&R) frameworks for cell-therapies by:

### A. Geography across Big5EU (France, Germany, Italy, Spain and UK)



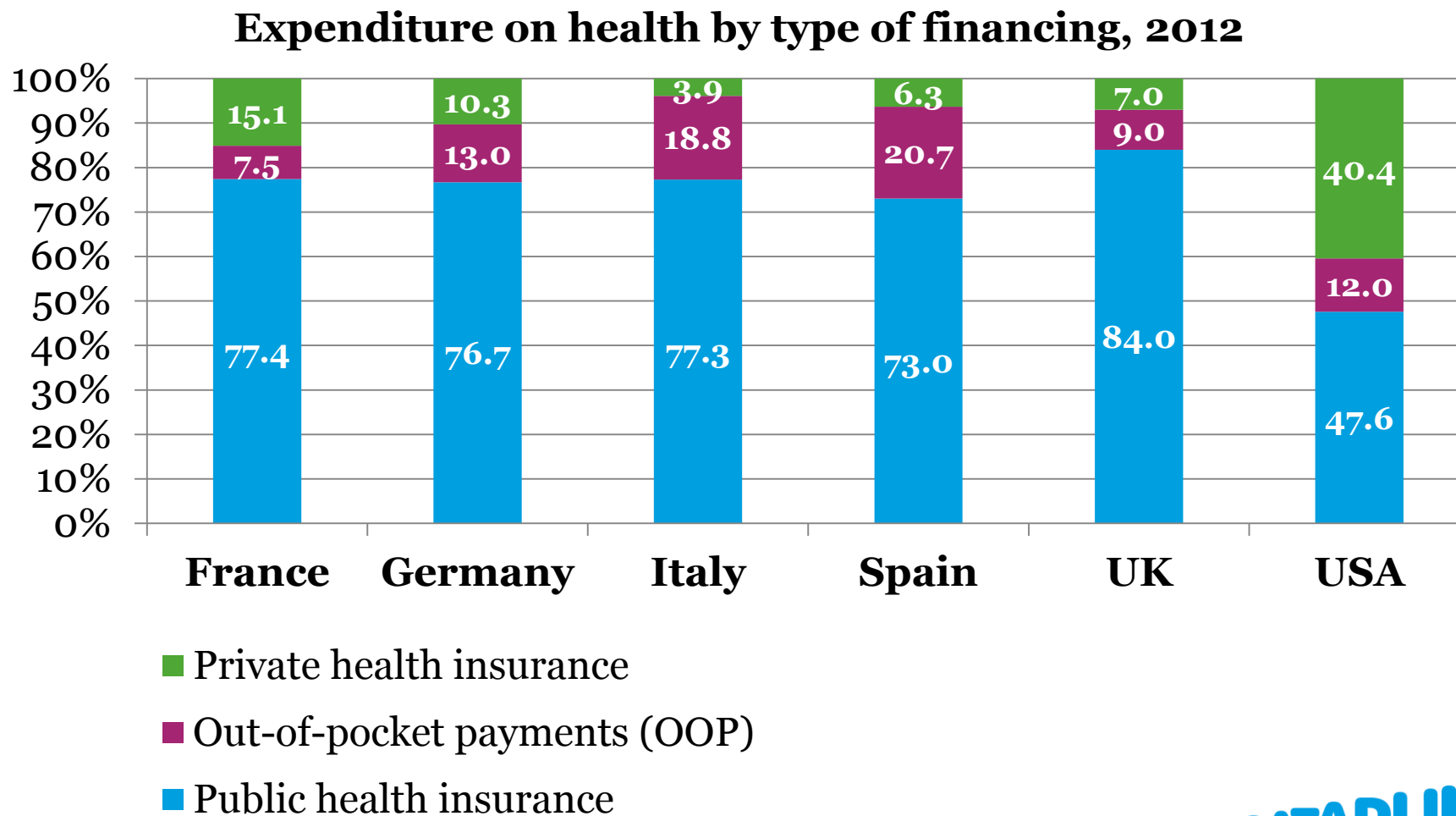
### A. Therapy features:

- magnitude of incremental benefit vs alternative therapeutic approaches
- size of target population
- regulatory status

- Scope:

- Hospital setting (in- and out-patient)
- The public payers

## Unlike the US, the Big5EU healthcare expenditure is largely driven by public health insurance



## In terms of formulary inclusion of innovative therapies, private insurance does not provide significant advantage over public

---

Country	Main features of private insurance
Germany	<ul style="list-style-type: none"><li>Typically cover same treatments as public; added-value from:<ul style="list-style-type: none"><li>shorter waiting time</li><li>greater choice of providers</li><li>access to private hospitals</li><li>UK: <u>excludes chronic disease</u></li></ul></li></ul>
Italy	
Spain	
UK	
France	<ul style="list-style-type: none"><li>Covers patient co-payments only</li><li>The non-profit insurers (Mutuelles) have little impact on P&amp;R</li></ul>

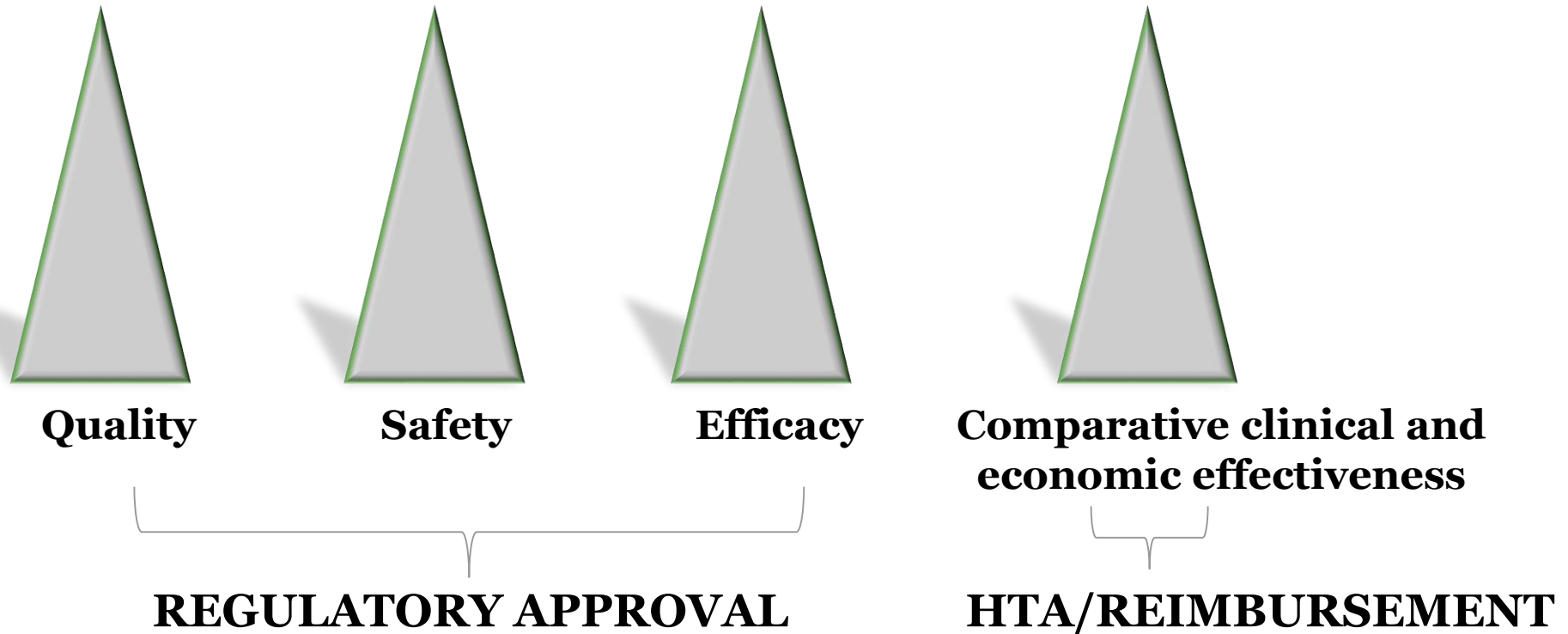
**The priority for cell therapies in Big5EU is to pursue public reimbursement**

**Licensed ATMP category**



# There are differences in data requirements between EMA approval and HTA across the Big5EU; the latter commands evidence of comparative effectiveness vs SOC/BSC

---



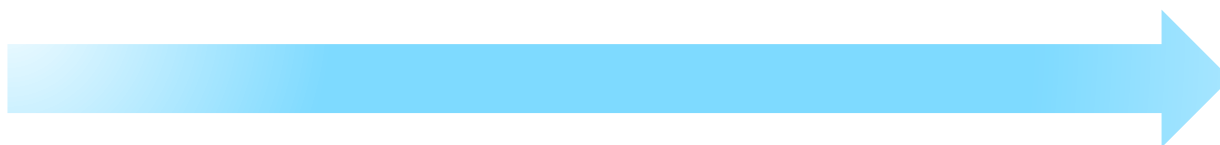
Insufficient comparative effectiveness evidence penalised ChondroCelect, MACI, Provenge

- Protracted MA negotiations
- Conditional or NO reimbursement

## In Big5EU, the assessment of reimbursed price for innovative licensed therapies has shifted towards value-based models

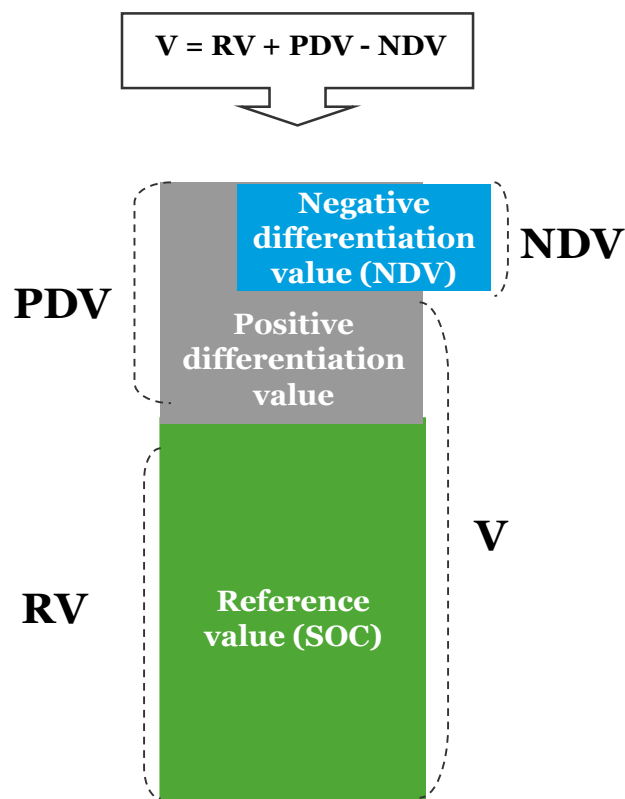
---

	Cost-based	Competitor-based	Value-based
What is it?	<ul style="list-style-type: none"><li>• Price based on costs, expected sales and margins</li></ul>	<ul style="list-style-type: none"><li>• Price driven by competition</li></ul>	<ul style="list-style-type: none"><li>• Price based on <b><u>comparative effectiveness</u></b></li></ul>
Examples	<ul style="list-style-type: none"><li>• Cost-plus pricing</li></ul>	<ul style="list-style-type: none"><li>• Penetration pricing</li><li>• Reference group pricing</li></ul>	<ul style="list-style-type: none"><li>• Cost-utility based pricing</li></ul>
Comments	<ul style="list-style-type: none"><li>• Becoming obsolete</li><li>• <i>Exception:</i> unlicensed ATMPs</li></ul>	<ul style="list-style-type: none"><li>• Enforced for <b>undifferentiated</b> products</li></ul>	<ul style="list-style-type: none"><li>• Typical for <b>differentiated</b> products</li></ul>



# Value-based assessments link price potential to the novel therapy's added-value

## PRINCIPLES OF VALUE-BASED ASSESSMENTS



### Differentiating Value

- Includes:
  - Clinical effectiveness
  - Economic effectiveness: budget impact, cost-effectiveness, cost-consequence
- Comparative data against the SOC/BSC **per country** is required:
  - Gold-standard: H2H RCT
  - Indirect comparisons can be leveraged
  - Comparisons can be based on modelled data to address:
    - Trial imbalance (observational vs RCT)
    - Treatment switching/cross-over
    - Extrapolations
- For a given indication, “V” varies depending on therapeutic positioning

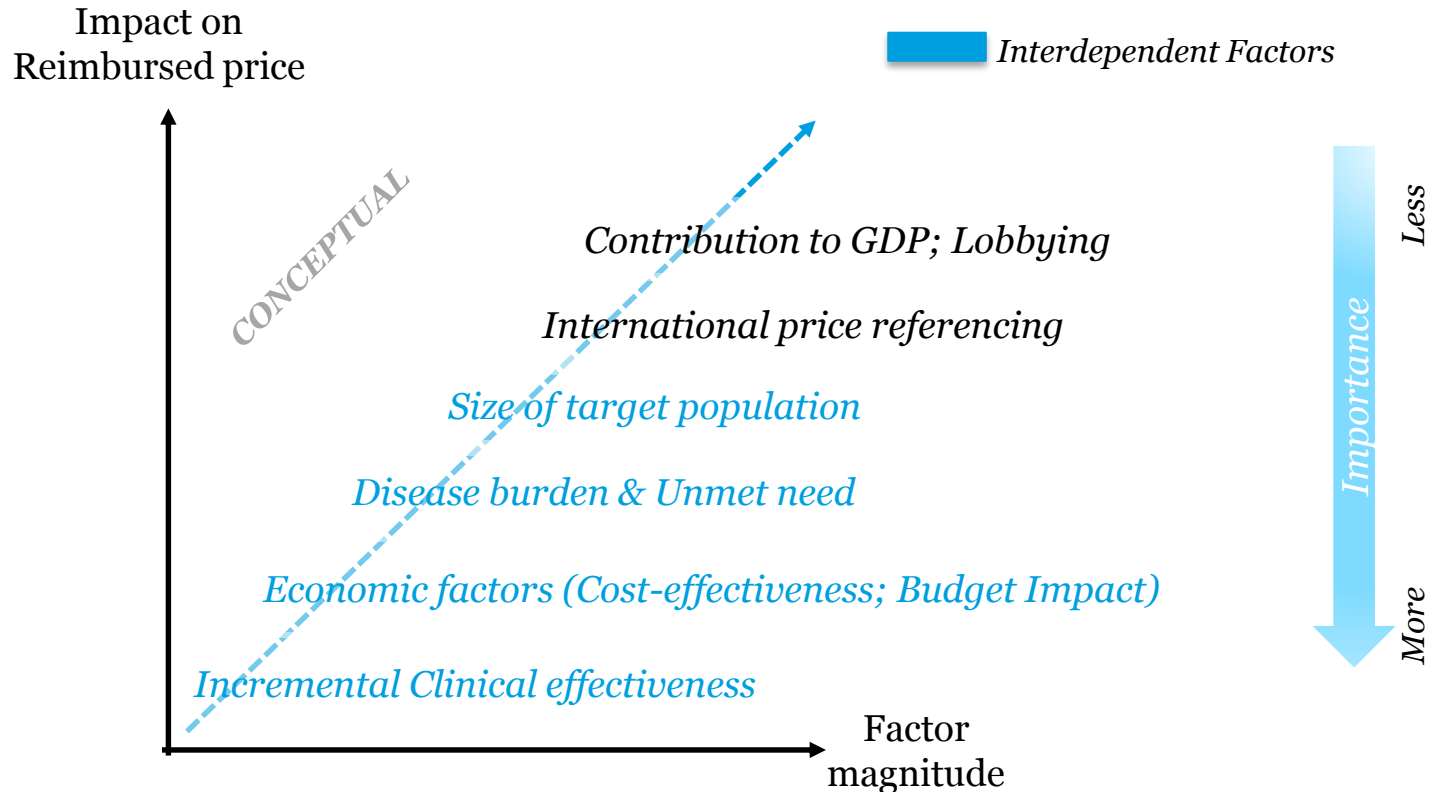


# How differentiating value is captured and translated to reimbursed price varies by geography

## *Most commonly used levers by market*

Levers	UK	France	Germany	Italy & Spain
1 <sup>st</sup> order	Comparative clinical effectiveness of the novel therapy vs a relevant comparator in the given market			
2 <sup>nd</sup> order	Cost-effectiveness	<u>ASMR1-3:</u> International price referencing (EU4) + Cost-effectiveness  <u>ASMR4-5:</u> Domestic comparator price  Price-volume agreements	<u>With added benefit:</u> Budget impact  Efficiency Frontier  International price referencing (EU15)  <u>No added benefit:</u> Domestic comparator price	Budget Impact + International price referencing  (cost-effectiveness: minor lever)

# Additional factors impact willingness to pay and reimbursed price potential across the Big5EU

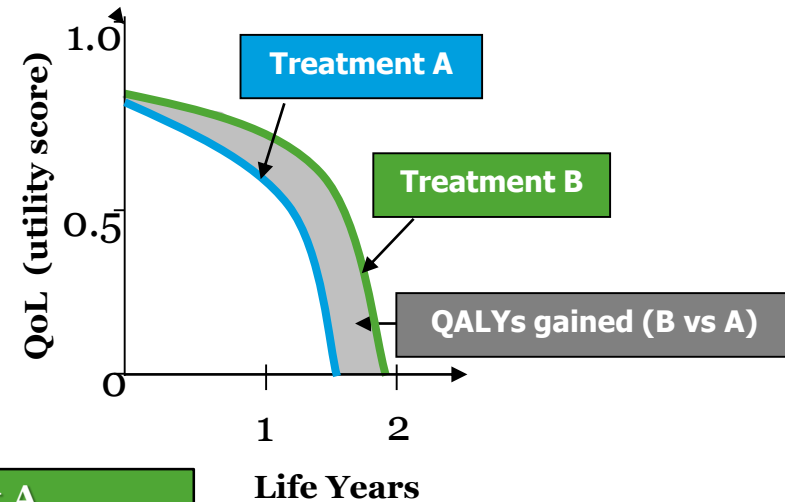


- Willingness to pay higher in very rare diseases & small subpopulations of larger indications
  - Due to budget impact and disease burden considerations
- Where significant economic constraints exist, P&R largely influenced by budget impact (BI)
  - This limits capacity to reward upfront for long-term benefits
    - Northern vs Southern Europe

# Unlike BI, CUA and its reliance on modelled data provides an opportunity for cell therapies to capitalise on long-term benefit claims; however its application and impact vary across Big5EU

## ● Cost-utility analysis (CUA) applicable in:

- High  
Low
- Impact on P&R
- UK
  - France: ASMR1-3
  - Spain
  - In Italy not mandatory
  - Germany: N.A

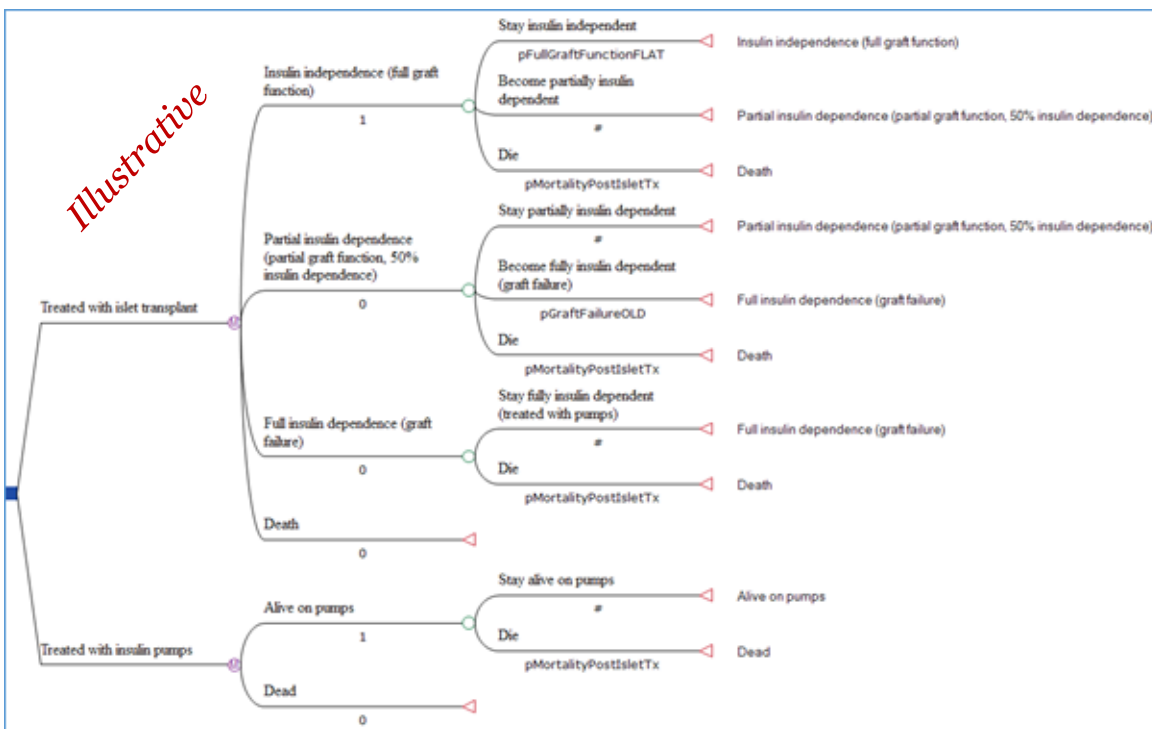


$$\text{ICER} = \frac{\text{Cost B} - \text{Cost A}}{\text{QALY B} - \text{QALY A}}$$

**QALY = Life expectancy (life years) x Quality of life (utility)**

- The ICER is an indicator of price potential
- Explicit ICER thresholds only in UK
  - ≥500 patients: £20-30K
    - For end-of-life up to £50K
  - Very rare conditions: ICER less relevant
    - e.g. Cerezyme (Gaucher's / prevalence 270) commissioned: ICER = £391,244

# For chronic disease, the CUA horizon can be lifetime; a therapy-specific model is used to capture time-dependent transitions across health states and outcomes



- Health states & transitions: as per disease trajectory
- Time horizon: Up to 100 yearly cycles (discounted)
- Pay-offs: cost, utility, life years
- Sensitivity analysis to address uncertainty
  - Deterministic: univariate / multivariate
  - Probabilistic: parametric / non-parametric (bootstrapping)
  - Structural

- Model type: Decision tree, State transition Markov model, DES, Transmission model
- Analysis: Cohort simulation, Microsimulation

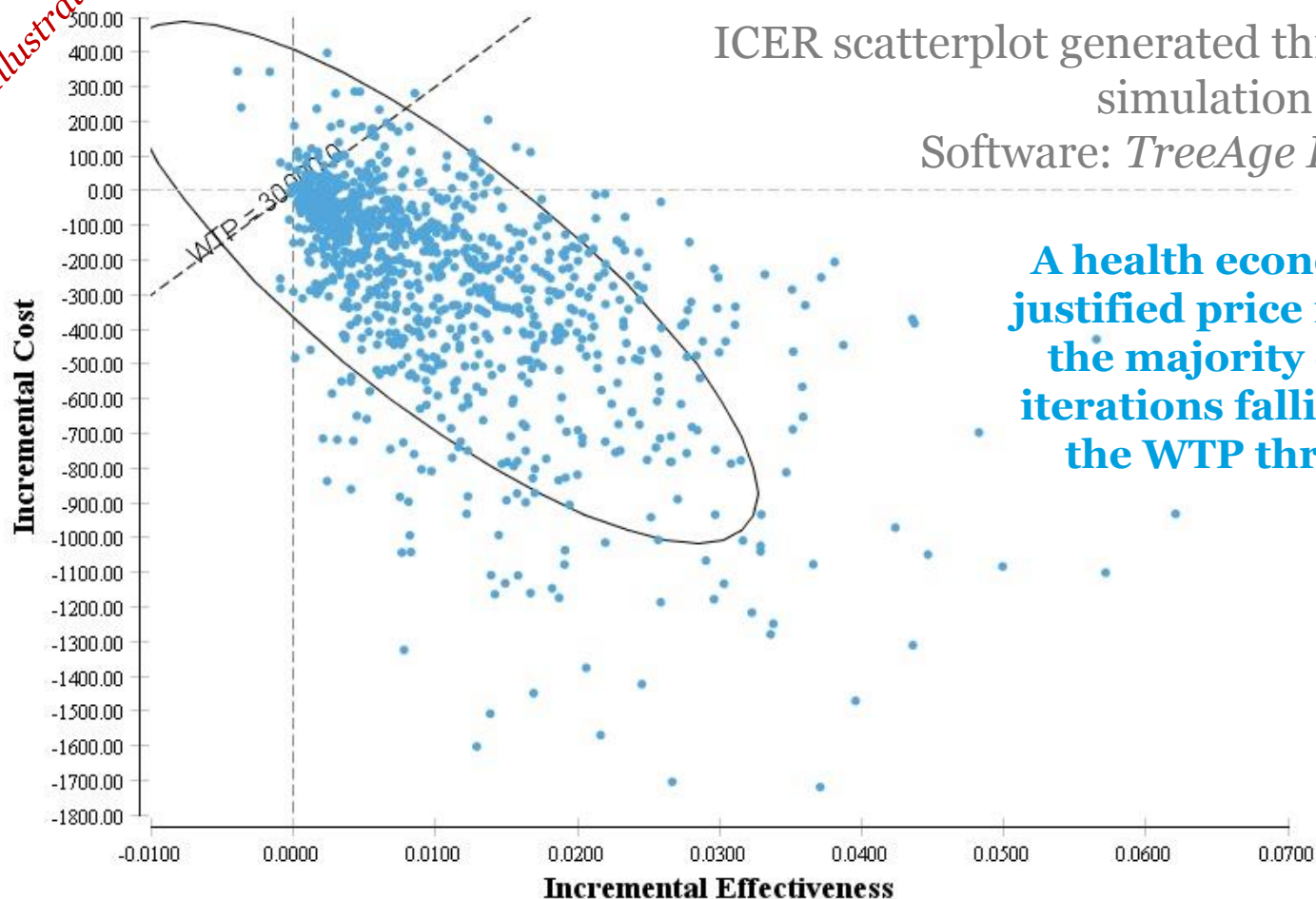
# Probabilistic sensitivity analysis informs price potential while accounting for uncertainty

Illustrative

Incremental Cost-Effectiveness (Cell Therapy X vs SOC)

ICER scatterplot generated through Monte Carlo simulation

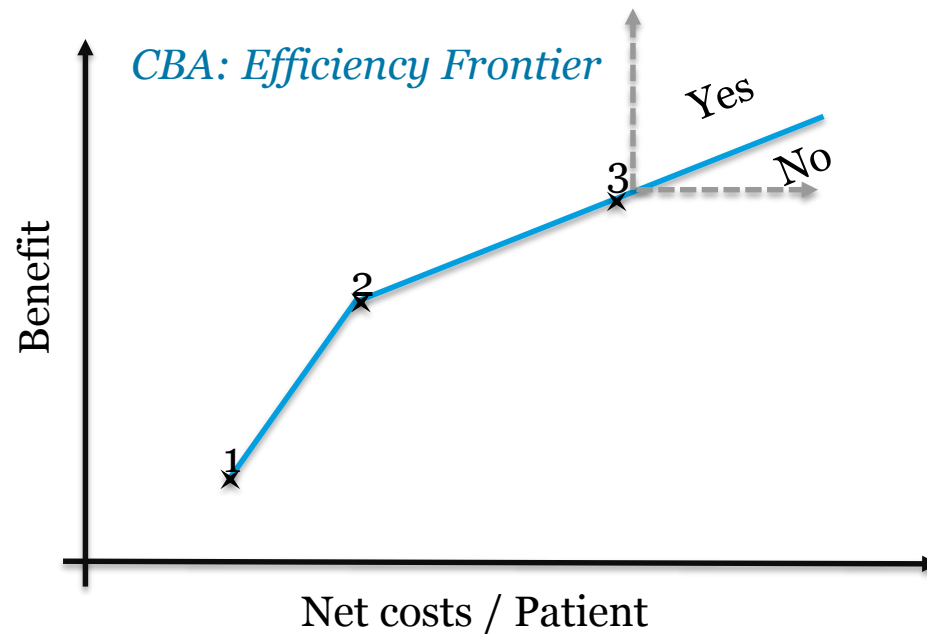
Software: *TreeAge Pro 2014*



**A health economically justified price results in the majority of ICER iterations falling below the WTP threshold**

# In Germany instead of cost-utility, a cost-benefit analysis may be applied but only as a last resort

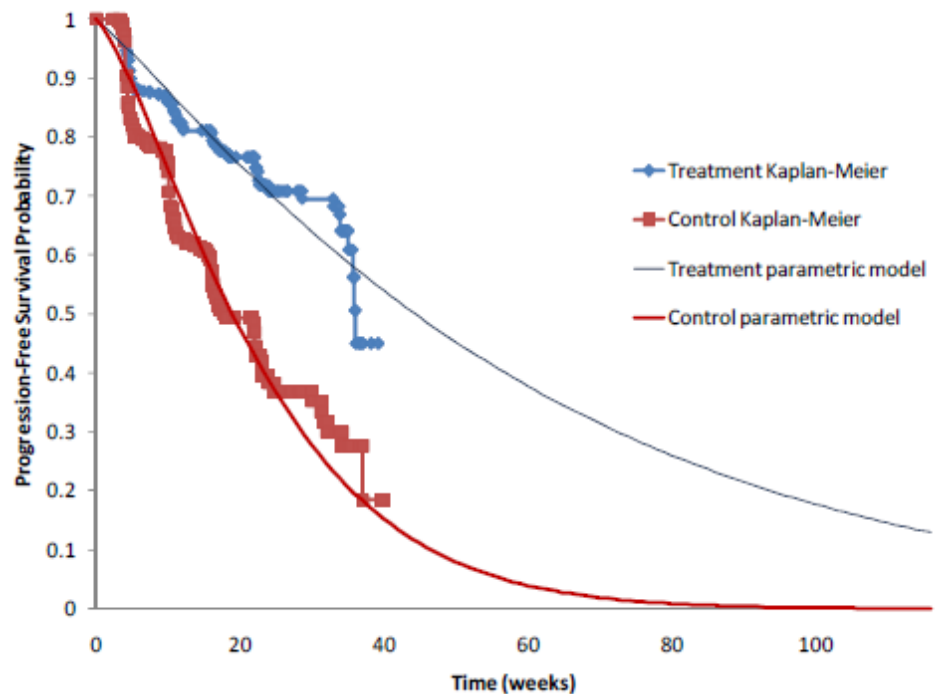
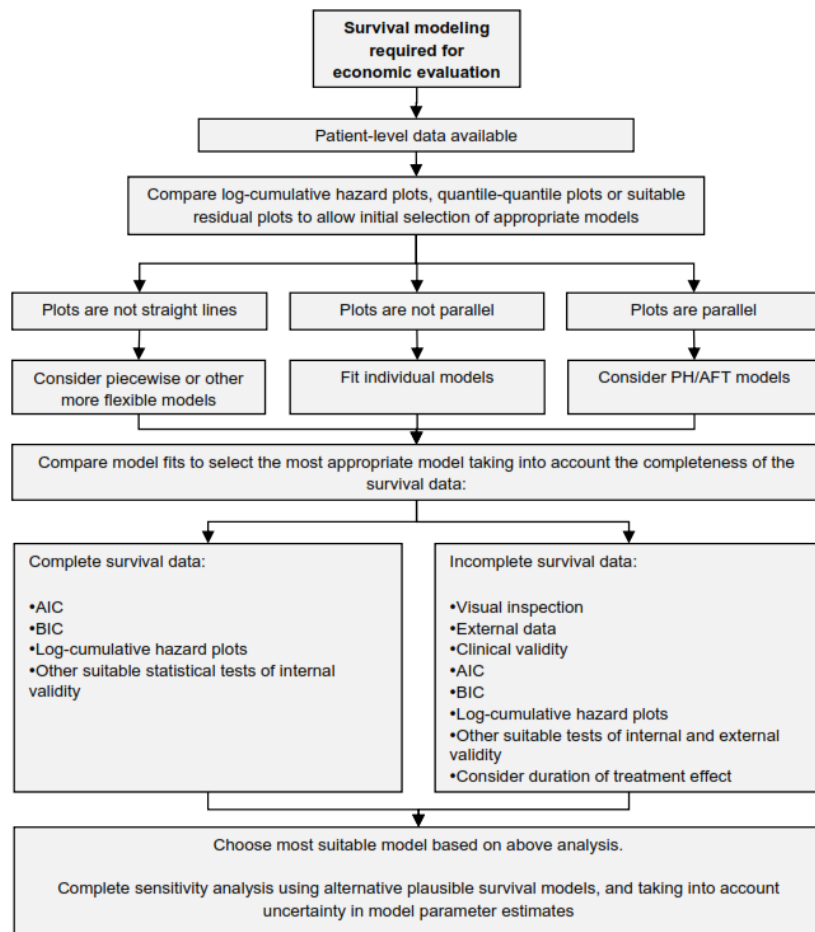
- If added benefit is recognised but agreement on price is not reached:
  - Manufacturers can request cost-benefit analysis to avoid international price-referencing (to EU15 average)



- Costs & benefits of currently commissioned treatments (e.g. 1-3) define the efficiency frontier (blue line) i.e. the willingness to pay (WTP)
- New treatments exceeding the existing cost and benefit levels can be considered acceptable if they are above the extension of the WTP

# Across Big5EU, only in UK there is clear HTA guidance on how long-term claims can be substantiated through extrapolations

- To bridge the gap between short-term data and long-term claims a regression framework is applied
  - Specified parametric and semi-parametric models are fitted
  - Optimal model selected based on statistical considerations and biological plausibility



Fitted survivor function for an example trial

©Copyright Reserved Cell Therapy Catapult 2015

**CATAPULT**  
Cell Therapy

# To address uncertainty outcomes-based pricing agreements can be employed

## ● Types of outcomes-based pricing agreements in operation:

- Cohort - based
  - Adjust price based on real world evidence

- On individual patient basis

e.g. ChondroCelect in Spain:

- 100% refund if failure at year one
- 75% refund if failure at year two
- 50% refund if failure at year three

*Conditional  
on  
generation of  
“Real World  
Evidence”*



Due to high RWE and administrative burden confidential discounts/rebates are implemented more often



# There is variation across the Big5EU on degree of centralisation of P&R decision-making

Increased Decentralisation 

Level	France	Germany	UK	Italy	Spain
<b>National</b>	Centralised P&R at national level (HAS, CEPS)	Centralised P&R at national level (G-BA, IQWiG, GKV)	-	Reimbursed ceiling price negotiated (AIFA)	Reimbursed ceiling price negotiated (AEMPS)
<b>Regional</b>	26 regional health agencies (ARS)  Distribute funding to hospitals; little P&R impact	~150 sickness funds (KKs); Distribute funding to hospitals	Regional HTA: • NICE • SMC • AWMSG  Regional commissioning for specialised services: • England • Scotland • Wales • Northern Ireland	Funding decision by each of the 21 regions  <u>EXCEPTION:</u> therapies achieving 'innovative' classification by AIFA must be funded  Can negotiate price down	Funding decision by each of the 17 regions  Can negotiate price down
<b>Local</b>			Hospital funding negotiations / Discounts		

# Following reimbursement decision hospital adoption of costly therapies may be delayed due to complexity of securing funding

- Funding mechanisms:
  - Short-term: Provide supplementary funding
  - Long-term: Revise / create new DRG (diagnosis related group) tariff

Country	Supplementary funding for hospital products
France	<ul style="list-style-type: none"><li>● Funding (<i>Hors T2A</i>) restricted to:<ul style="list-style-type: none"><li>● ASMR I-III, or ASMR IV-V against a comparator with ASMR I-III</li></ul></li></ul>
Germany	<ul style="list-style-type: none"><li>● Temporary funding (<i>NUB</i>) set locally; Permanent funding (ZE) set nationally</li></ul>
Italy	<ul style="list-style-type: none"><li>● Tariff set regionally (File F)</li></ul>
Spain	<ul style="list-style-type: none"><li>● <b><u>Rarely granted by regions: hospitals have to absorb costs</u></b> (impacting uptake!)</li></ul>
UK	<ul style="list-style-type: none"><li>● Agreed regionally</li><li>● Cancer Drugs Fund (£340M p.a.) in England for therapies without NICE endorsement</li></ul>

**Launch strategy should account for meeting deadlines for supplementary funding applications**

## Other categories:

**Minimally Manipulated Cell Therapies**

**Hospital Exemptions**

**Compassionate Use**



# Other regulatory categories and main differences from the P&R processes described for licensed ATMPs

---

## **Minimally manipulated cell therapies (MMCs)**

- In France, Germany and UK same P&R assessments apply to MMCs and ATMPs
- In Italy and Spain, MMCs can bypass national/regional P&R assessments and be assessed by hospitals only

## **Hospital exemptions / Specials**

- Price often determined on a cost-plus basis (rather than value-based)
  - Exception Spain: Need to be supplied on a not-for-profit basis

## **Compassionate use**

- In Germany the manufacturer has to provide treatment free of charge
- In the other 4 markets price is set freely
  - In France, free-pricing can be penalised through post-launch rebates (ATU)



**For more info visit:**  
***[https://ct.catapult.org.uk/  
whitepapers-and-resources](https://ct.catapult.org.uk/whitepapers-and-resources)***

**Cell Therapy Catapult**  
12th Floor Tower Wing  
Guy's Hospital  
Great Maze Pond  
London SE1 9RT  
+44(0)20 3728 9500

**Innovate UK**  
Technology Strategy Board

Catapult is an Innovate UK programme.

