

Balancing Innovation and Affordability: Health System Trade-offs in Thailand's Reimbursement Restriction Policies for High-Cost Medicines

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Introduction

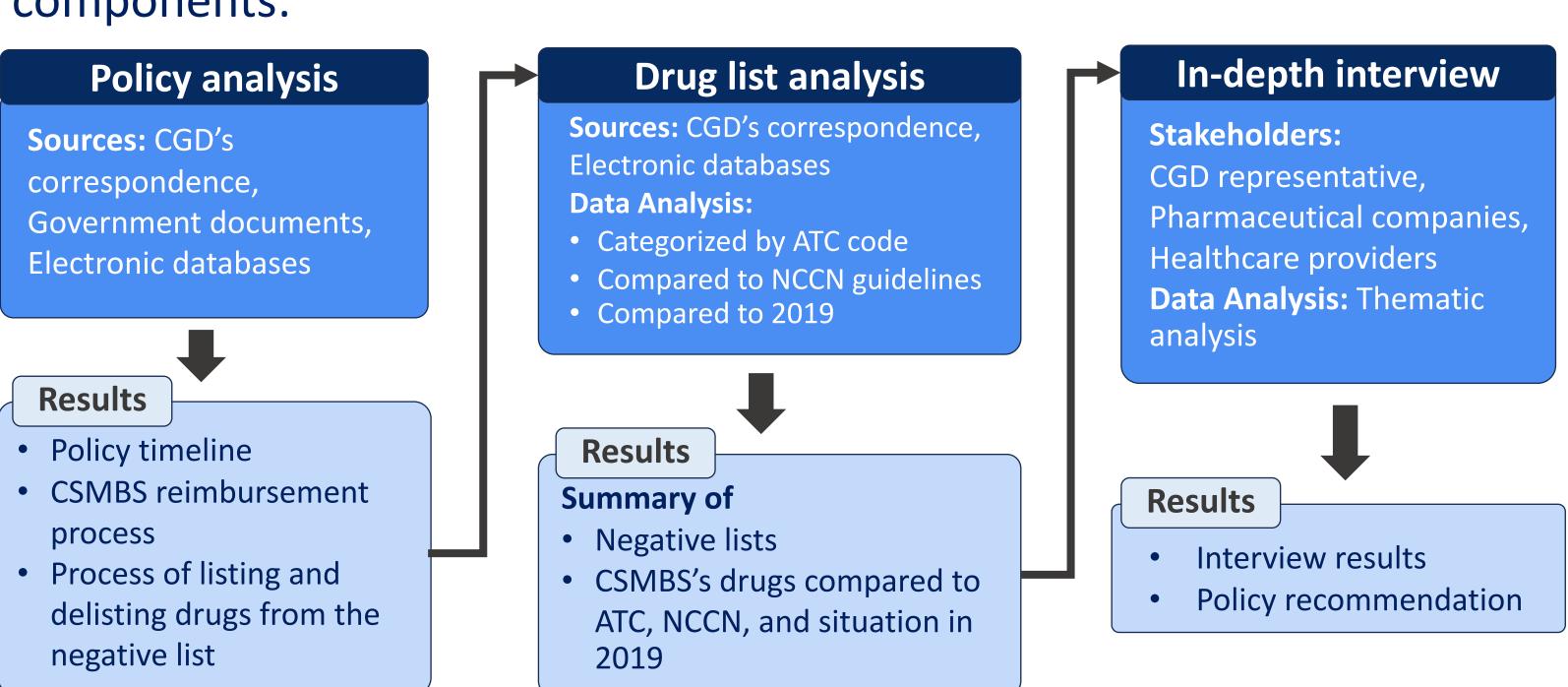
- Civil Servant Medical Benefit Scheme (CSMBS) beneficiaries are entitled to extensive coverage for medication expenses
- However, policies are in place to optimize the drug reimbursement system for better **budget control** and **appropriate drug usage**
- As a result, certain **high-cost medications** may have limitations on reimbursement, require specific reimbursement conditions, or might not be covered at all

Objectives

To systematically assess the impact of the Comptroller General Department's (CGD) reimbursement restriction policy on innovative drugs in Thailand.

Method

A mixed-methods study was conducted to evaluate the impact of the CGD's drug reimbursement policy. The study utilized three key components:



Results

Policy Analysis

The CSMBS has progressively evolved its drug reimbursement policy to manage rising costs of innovative therapies. Initially, it introduced specific prior authorization (PA) programs for high-cost drugs in oncology. The most significant shift was in 2018 with the "negative list" policy (w34), which initially targeted new oncology and hematology drugs. This policy was expanded in 2023 to include all high-cost drugs registered after 2018, reinforcing a commitment to cost-containment and controlled access to innovative therapies.

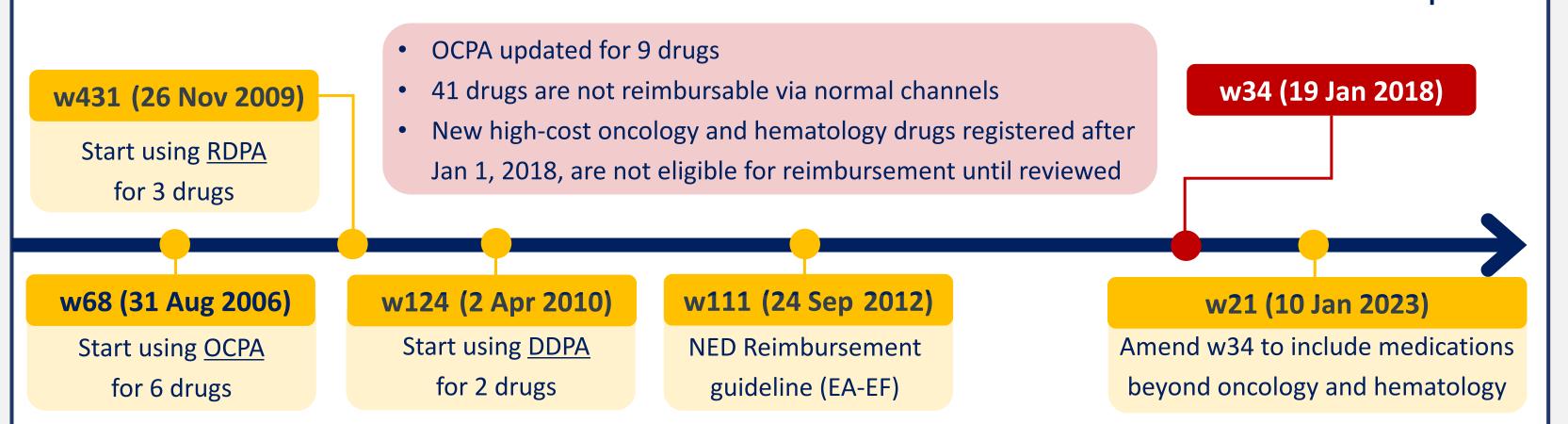


Figure 1: Policy Timeline of drug reimbursement of the CSMBS

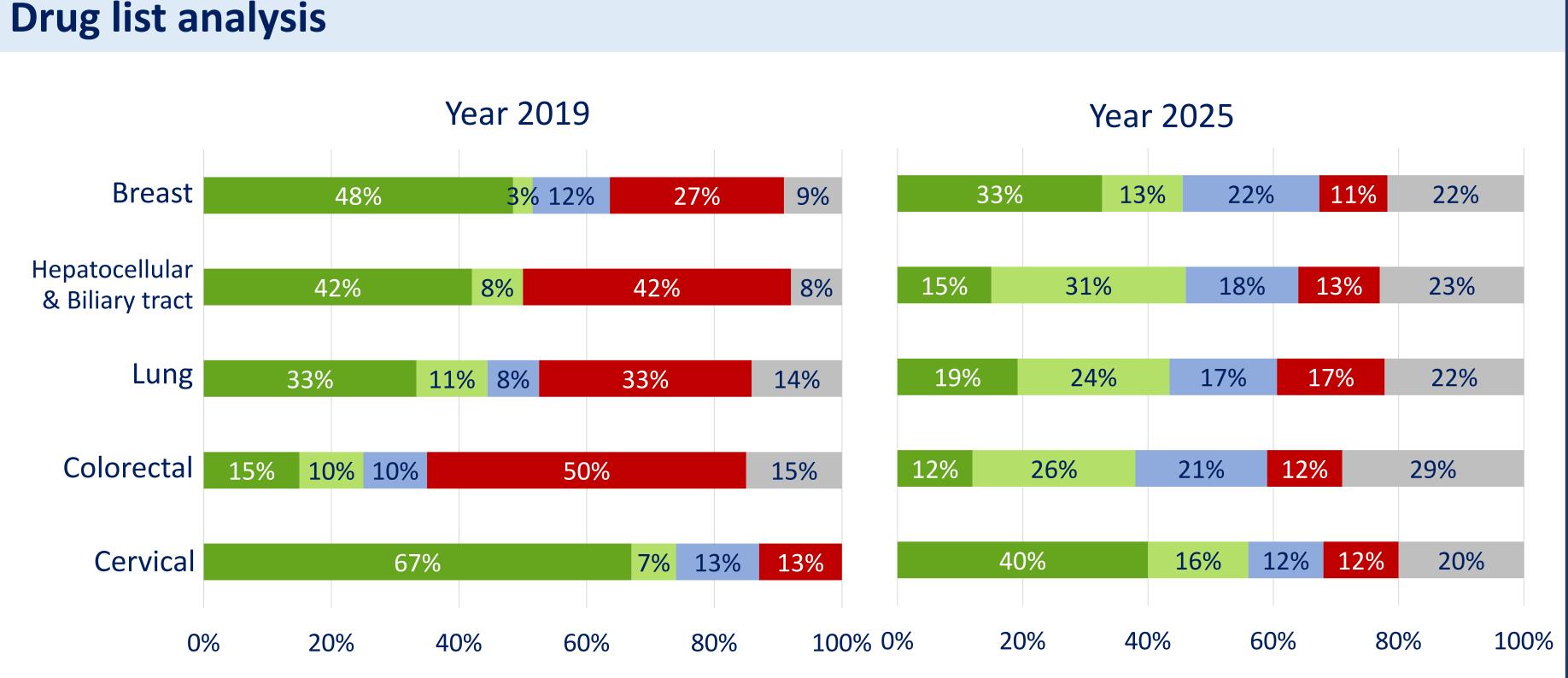
In-depth interview

Interviews were conducted with 19 key stakeholders, including representatives from pharmaceutical companies, healthcare professionals (physicians and pharmacists), and the CGD's representative. These interviews revealed several key impacts of the policy:

- **Healthcare Professionals:** The policy has increased administrative burdens and requires hospitals to invest in new resources and information systems to comply with reimbursement protocols and frequent updates to the drug list.
- **Pharmaceutical Companies:** Pharmaceutical companies face uncertainty that influences their internal strategies for product launches and clinical trials, as the lack of a clear definition for "high cost" and delayed reimbursement timelines can make the market unviable.
- **CGD Representatives:** The CGD's representative expressed concern that the drug evaluation process is prolonged due to a lack of qualified personnel and expertise, which creates a barrier to patient access.

To assess the impact of the policy, a comparison of NCCN guideline-recommended drugs to those available in Thailand was conducted. The analysis, presented in Figure 2, shows the comparison of drug coverage in 2019 and 2025.

- Overall Approval: While the percentage of NCCN-recommended drugs approved in Thailand decreased from 2019 to 2025, their reimbursement improved
- Increased Reimbursement: A greater proportion of NCCN-recommended drugs were listed on the National List of Essential Medicines (NLEM) and became reimbursable under the CSMBS scheme after the policy's implementation
- **Drug List Analysis:** The analysis of affected drug lists showed that by 2025, over 60% of drugs listed in Thailand and recommended by NCCN were reimbursable under the CSMBS



• Included in NLEM ● Drug with conditional reimbursement ● NED ● Non-reimbursable ● Not registered in Thailand
Figure 2: Comparison of drugs listed in the Thailand drug list and drugs recommended in the NCCN guidelines in 2019/2025 in the top 5 cancers in Thailand

Conclusion

Key Findings



Policy Impact: The policy has effectively controlled the budget and improved patient access to innovative drugs, while mitigating financial hardship.



Administrative Burden: The policy has significantly increased the administrative workload for healthcare providers due to the need for frequent updates and complex management systems.



Access Delays: The drug selection process has caused delays in patient access due to the limited capacity of the CGD's committee.



Industry Response: Pharmaceutical companies now consider the w34/21 policy when developing strategies for clinical trials, product launches, and market access in Thailand.

Policy Recommendation

Prioritization criteria are warranted to be developed to prioritize timely access to innovative drugs for diseases with unmet medical needs while containing budget and mitigating household financial catastrophes.

References