



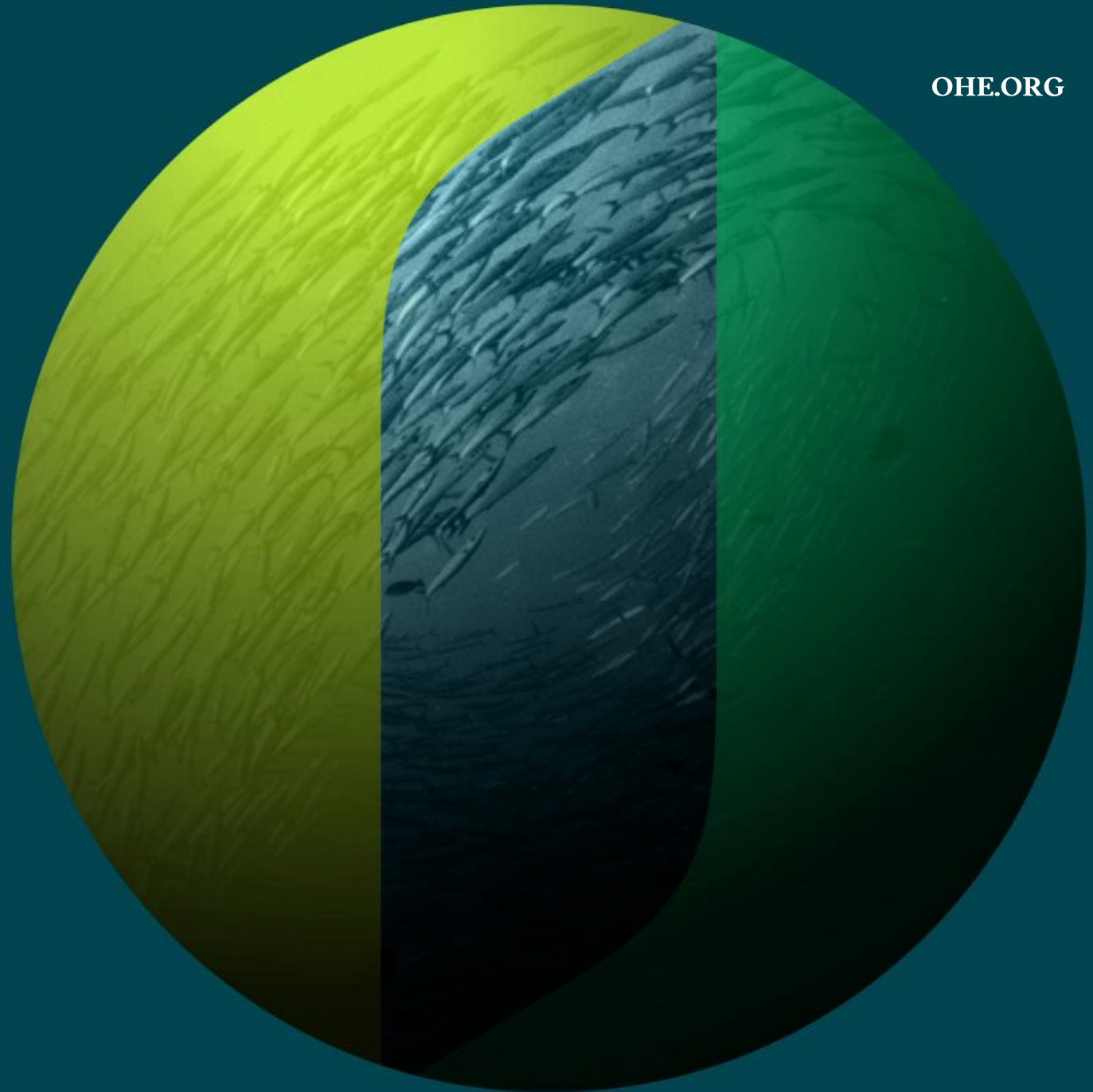
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YOUR BAR OR MINE?

**Are we holding change to
a higher bar than the
status quo in HTA?**

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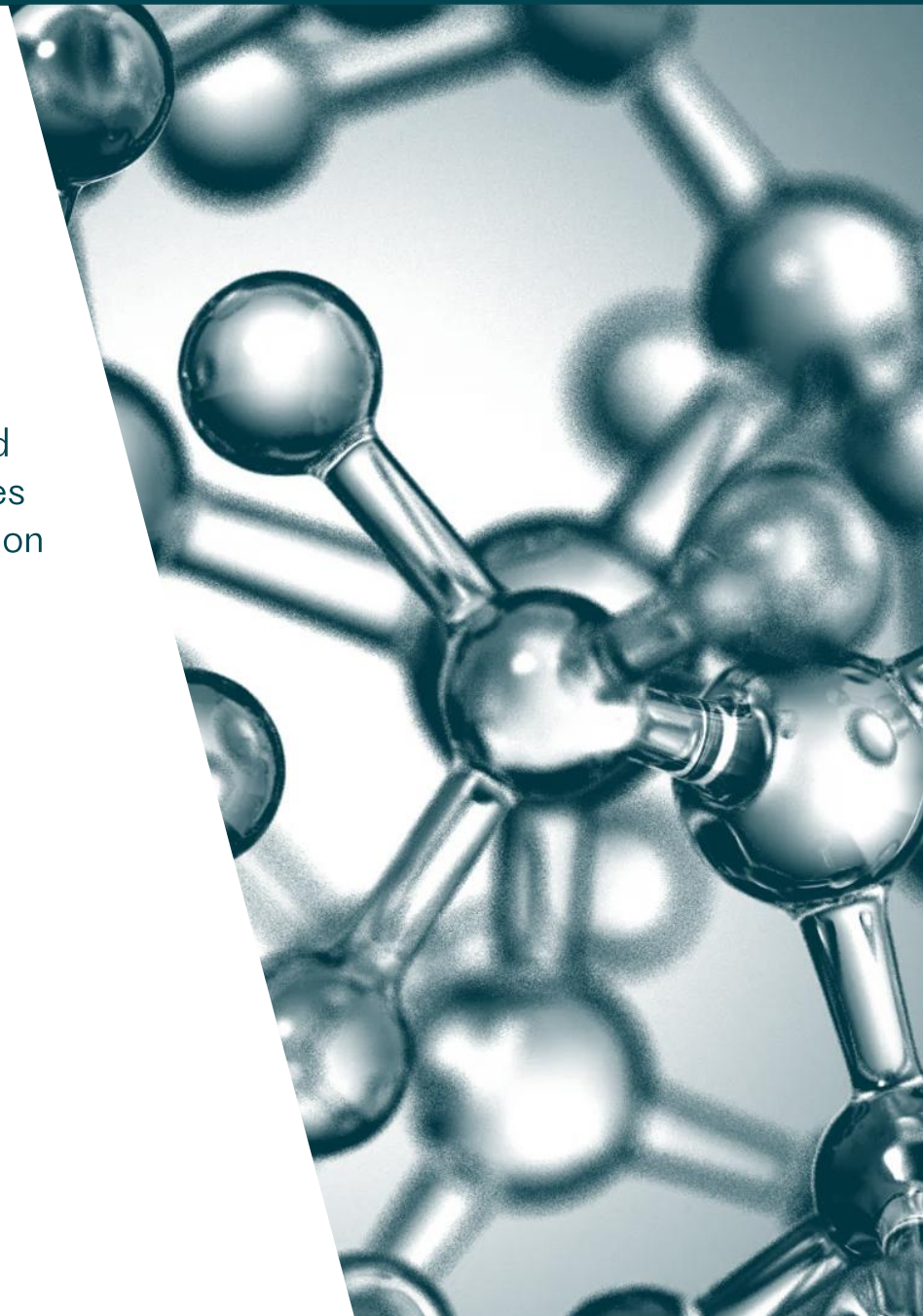
ISPOR 2026 | Issue Panel



DISCLOSURES

Lotte Steuten is an employee of the Office of Health Economics (OHE), a registered charity (non-profit) and Independent Research Organisation in the UK, which receives funding from a wide range of public and private sector sources for work on vaccination programmes and many other topics related to health economics and health policy.

The views and opinions expressed in this presentation are my own, based on over 20 years of experience in health technology assessment (HTA), and do not necessarily reflect those of OHE or any of its funders.





First, let's clear the bar area

What the letter of dissent is NOT about

QALYs vs. Alternatives

This is not about whether QALYs or any proposed alternative metric is 'better'.

We lack robust empirical evidence to support such comparisons.

The debate about QALY shortcomings is real — but it's a different debate.

The Threshold

This is not about whether any cost-effectiveness threshold should be demand-side or supply-side.

Or how high or low it should be.

Important question — genuinely contested — but not the one in front of us today.

Opportunity Costs

This is not specifically about opportunity costs.

No single agreed-upon estimate exists.

Quantifying displaced health reliably remains an open empirical challenge across jurisdictions.

The Asymmetric Bar Problem

What the letter of dissent IS about

Adding a New Benefit

- Extensive empirical evidence required
 - Risks of inclusion foregrounded
 - Practical challenges emphasised
 - Burden of proof: on inclusion
-

VS.

Retaining the Status Quo

- Imperfect evidence accepted as-is
 - Costs of omission invisible
 - Incompleteness acknowledged but tolerated
 - Burden of proof: limited
-

“Over time, a framework that treats inclusion as the higher-risk option and omission as the lower-risk default will tend to favour the status quo irrespective of whether that best reflects the objectives that HTA bodies are asked to pursue.”

Why omission is not a neutral choice

The decision-theoretic case for openness

Imperfect ≠ inadmissible

The relevant question: does an additional dimension — even with imperfect evidence — meaningfully contribute to understanding full value?

Imperfection is the current baseline, not the exception.

Broader ≠ more permissive

An expanded benefit function is directionally neutral. Wider effects can strengthen or weaken the case for adoption, support disinvestment, or justify lower prices.

It's about better information, not looser decisions.

Omission has costs too

Leaving a relevant benefit unmeasured does not ensure fairness or consistency — it means its implications remain invisible in the formal analysis.

Invisibility is a choice with consequences.

“When economic evaluation already operates with incomplete, evolving empirical representations of benefits and opportunity costs — that is an argument for greater openness to methodological change, not extra caution for additional benefits.”

On balance

I strongly support

- HEMA's overall objective
- Transparency about the normative nature of benefit specification
- Recognition that evidence will always be imperfect and evolving
- The goal of inclusive methodological debate

I challenge

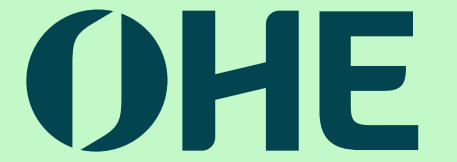
- Apply evidential standards symmetrically — status quo and novel benefits alike
- From a decision-theoretic view: imperfect existing evidence argues for more openness, not less





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