CADTH Parallel Scientific Advice Programs with NICE and Health Canada

PNS250

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Introduction

- An increasing number of options are available for pharmaceutical companies looking to seek integrated scientific advice between regulators and health technology assessment (HTA) bodies, along with patient involvement, to optimise their evidence development program and ensure timely patient access to new transformational medicines.
- In 2019, the Canadian Agency for Drugs and Technologies in Health (CADTH) announced two parallel scientific advice programs: with the National Institute for Health and Care Excellence (NICE; February 2019)[1,2] and with Health Canada (regulatory agency; March 2019).[3,4]
- Applications for both parallel scientific advice programs are now being accepted with multiple services in progress and/or completed.

Objective

- The study objectives were to:
  - Outline the processes for obtaining advice through the new parallel scientific advice programs.
  - Explore the value to manufacturers of engaging in the parallel advice processes, and specific advantages and disadvantages of the programs.

Methods

- Information about CADTH's parallel scientific advice programs was obtained through:
  - Public-domain sources, including the CADTH, NICE, and Health Canada websites
  - Strategic discussion with CADTH scientific staff members Amy Sood (Manager, Scientific Advice) and Michelle Mujoomdar (Director, Scientific Affairs).
- Topics included similarities and differences between CADTH's parallel and standard scientific advice (with CADTH only) programs, reasons for CADTH's collaboration with NICE, and advantages/disadvantages of seeking parallel advice compared with seeking HTA advice separately.

Results

Overview of CADTH's scientific advice programs

- An overview of CADTH's parallel scientific advice programs with NICE and Health Canada, as well as the standard scientific advice program with CADTH only is presented in **Table 1**.[1-5]
- Both parallel scientific advice programs include submission of the same briefing book to each organization involved, a face-to-face meeting between the manufacturer and organizations, and provision of separate advice reports by each organization (plus a summary of alignment provided by the NICE-CADTH program only).
- Slight differences between the parallel scientific advice programs include the fee schedule, format and location of the face-to-face meeting, timelines, and the summary of alignment which is only provided by the NICE-CADTH program only.
- In the NICE-CADTH parallel scientific advice program, country-specific input is still incorporated with separate engagement of experts and patients by NICE and CADTH.

Table 1. Overview of CADTH's Scientific Advice Programs

	Standard scientific advice with CADTH only[5]	Parallel scientific advice with NICE-CADTH[1,2]	Parallel scientific advice with Health Canada-CADTH[3,4]
Eligibility	**Drug products in early-stage development** (prior to initiation of Phase III or pivotal trials) including new drugs, existing drugs with new indications, and drugs for rare diseases.		
Briefing book	Manufacturers **submit briefing book to CADTH**, generally with a maximum of 10 questions for which the manufacturer wishes to obtain advice.	Manufacturers **submit same briefing book to each HTA body**. Up to two additional, organization-specific questions can be included.	Manufacturers **submit same briefing book to each agency/ HTA body**. A few additional organization-specific questions can be included. **Note:** Quebec HTA body INESSS is participating in an observer role as it currently does not have a scientific advice program in place.
Meeting	**Face-to-face meeting** (3 hours) takes place between CADTH and the manufacturer in Ottawa or Toronto, Canada; advice is provided verbally and allows for an open dialogue to discuss key issues identified in the briefing book.	**Face-to-face meeting** (3 to 4 hours) that is exploratory in nature takes place between CADTH, NICE, and the manufacturer in either England (London or Manchester, dependent on availability) or Ottawa, Canada, based on the manufacturer's choice; key issues identified in the briefing book are discussed.	**Face-to-face meeting** (3 hours) takes place between CADTH, Health Canada, and the manufacturer in Ottawa, Canada; advice is provided verbally and allows for an open dialogue to discuss key issues identified in the briefing book. While INESSS attends the meeting, it is not providing advice at this time.
Interaction between and within organizations	There are **various time points** (both before and after the face-to-face meeting) when the organization(s) meet to discuss issues and where alignment in advice can occur, while respecting the roles and remits of each organization.		
Advice report	Manufacturer receives written **record of scientific advice** from CADTH.	Manufacturer receives **separate advice reports** from CADTH and NICE as well as a **joint summary** from the two HTA bodies highlighting areas of alignment.	Manufacturer receives **separate advice reports** from CADTH and Health Canada.
	In all three programs there is an optional process for the manufacturer to submit **clarification questions** on the advice reports; the responses from the organizations are in writing.		
Expert involvement	CADTH aims to engage **one clinical expert, one CADTH expert,** and **one health economic expert** (if relevant). Experts attend the face-to-face meeting in person.	**Experts are engaged separately** by CADTH and NICE. Experts attend the face-to-face meeting in person or via teleconference, depending on the location.	CADTH engages **up to three experts** who attend the face-to-face meeting in person.
Patient involvement	Conducted by CADTH.	Conducted separately by CADTH and NICE.	Conducted by CADTH.
Fees	Fees charged by CADTH **based on the complexity and scope** of briefing book.	Fees charged by **both HTA bodies based on the complexity and scope** of briefing book.	Service follows **CADTH's fee schedule based on complexity and scope of briefing book**, as Health Canada is not currently charging.
How many completed or in progress?	Program has been running **since January 2015**. As of September 2019, **24 CADTH-only services** have been completed or are in progress.	Program has completed **one pilot** parallel scientific advice service, with **two services currently in progress**.	Program has **two services currently in progress** with additional inquiries being considered.

CADTH = Canadian Agency for Drugs and Technologies in Health; HTA = health technology assessment; INESSS = Institut national d'excellence en santé et en services sociaux; NICE = National Institute for Health and Care Excellence

Reasons for CADTH's collaboration with NICE

- NICE was one of the first HTA bodies to establish a specific HTA scientific advice program in 2009 and has since become a well-established and experienced provider of scientific advice.
- CADTH's standard scientific advice program launched in 2015 and was informed by the program employed by NICE and other established scientific advice programs.
  - Hence, NICE and CADTH's programs have inherent similarities in how they provide advice.
- The parallel scientific advice offering between CADTH and NICE allows for synergies between the programs to streamline the process of obtaining advice in two separate markets.

Differentiators of CADTH's scientific advice

- CADTH's scientific advice differs from that of European HTA bodies in the provision of advice during the face-to-face meeting, as evident in the standard scientific advice program (with CADTH only) and the parallel program with Health Canada.
- During the meeting with CADTH, the manufacturer has the opportunity to verbally receive and discuss the actual draft advice with CADTH and raise any points of clarification in person.
- This differs from other scientific advice programs where face-to-face meetings tend to occur at an earlier stage in the process and are more exploratory in nature, thus not providing manufacturers with the opportunity to discuss the drafted advice with the HTA body.
- Note that in all three of CADTH's scientific advice programs, manufacturers have an opportunity to submit written clarification questions on the advice reports.

Results (Cont'd)

Value of CADTH parallel scientific advice to manufacturers

- An overview of the value to manufacturers of engaging in CADTH's parallel scientific advice programs with NICE and Health Canada is presented in **Figure 1**.
  - CADTH's parallel scientific advice processes allow manufacturers to confirm a single approach for their evidence generation plans that meets the needs of both organizations.
  - The parallel programs offer the potential for streamlined, collaborative discussion to obtain early early awareness of key issues across organizations.

Figure 1. Overview of value to manufacturers of engaging in CADTH's parallel scientific advice programs

CADTH = Canadian Agency for Drugs and Technologies in Health; EUnetHTA = European Network for Health Technology Assessment; HTA = health technology assessment; NICE = National Institute for Health and Care Excellence

- Specific advantages and disadvantages of CADTH's parallel programs are presented in **Figure 2**.
  - Parallel NICE-CADTH advice provides an overall time- and cost-saving approach to collaboratively address evidence generation challenges across the HTA bodies, but potentially reduces the level of country-specific detail discussed at the face-to-face meeting.
  - Parallel Health Canada-CADTH advice enables simultaneous engagement with multiple stakeholders while discussing common issues and understanding areas of divergence; however, resources are required to both educate stakeholders on the new parallel process and attain manufacturer cross-team alignment on evidence generation strategy and communication.
  - Note that the advantages and disadvantages highlighted in **Figure 2** could also be relevant for other parallel scientific advice programs.

Figure 2. Advantages and disadvantages of CADTH parallel scientific advice

ADVANTAGES
of CADTH parallel advice versus seeking advice separately with the HTA bodies/regulatory agency

- Opportunity to develop a **single approach** to evidence generation that meets the needs of both HTA bodies/regulator by:
  - Identifying **issues common to both** organizations (particularly relevant for the NICE-CADTH program which provides a summary of alignment)
  - Understanding **divergences in organization requirements** (particularly relevant for the Health Canada-CADTH program which engages two different stakeholders)
- Avoid **time and cost** to engage the organizations individually with different briefing books and attend/prepare for separate face-to-face meetings
- Opportunity for **collaborative discussion** between the organizations at various timepoints (both before, during and after the face-to-face meeting), enabling idea sharing and developing solutions to evidence generation challenges
- Effective route **depending on the product's strategy** (e.g., perceived potential differences in advice/requirements for the target indication) and anticipated evidence generation challenges (e.g., acceptability of single arm studies and differences in economic analysis)

Advantages specific to the NICE-CADTH program	Advantages specific to the Health Canada-CADTH program
• Opportunity to **decrease overall time to patient access** by achieving a parallel versus sequential HTA scientific advice route in the cost-effectiveness-driven market archetype	• Engagement with **multiple stakeholders** simultaneously

DISADVANTAGES
of CADTH parallel advice versus seeking advice separately with the HTA bodies/regulatory agency

- No formal process for coming to a **consensus on different requirements** between the organizations (e.g., uncertainties on comparator choice, clinical benefit, safety, trial design, and cost-effectiveness)
  - **Note:** Areas of divergence can be discussed during the face-to-face meeting and further clarification can be requested in the written clarification questions on the advice reports
- Reduced opportunity to go into **country-specific detail during verbal discussion** (i.e., one 3 to 4 hour face-to-face meeting in the parallel process versus two separate meetings of 2 to 3 hours in the single country HTA process)
  - **Note:** The discussion during the meeting may be prioritized based on the manufacturer's preference
- Additional **time and effort for CADTH** to engage in the parallel advice program due to additional meetings held with NICE or Health Canada during the process

Disadvantages specific to the NICE-CADTH program	Disdvantages specific to the Health Canada-CADTH program
• **Lack of discount** in the combined fees for the parallel process (i.e., CADTH fee plus NICE fee for parallel process is the same as seeking advice separately from both bodies)	• Potential for **regulatory agency and HTA body to influence each other** resulting in challenges for the manufacturer
• Additional **travel costs** for CADTH/NICE, depending on the location of the meeting, which are reflected in the fee for manufacturer	• Challenges to attain internal (manufacturer) **cross-team alignment** to develop and communicate clear integrated plan for evidence generation
	• **Time required for manufacturer to engage with stakeholders** to educate them on the process of the new parallel program (as the program is new with two Health Canada-CADTH services in progress)

CADTH = Canadian Agency for Drugs and Technologies in Health; HTA = health technology assessment; NICE = National Institute for Health and Care Excellence

Conclusions

- CADTH's parallel scientific advice processes allow manufacturers to confirm a single approach for their evidence-generation plans that meets the needs of both organizations via a streamlined and collaborative process.
- Engaging in CADTH's parallel advice programs allows manufacturers to align with global trends for multi-organization scientific advice.
- When deciding which integrated scientific advice program to pursue, manufacturers should conduct a systematic assessment of the available options.[6]
  - The advantages and disadvantages should be specifically appraised in relation to the product and particular issues, and manufacturers may decide to engage in one or multiple advice programs.
  - New options for integrated scientific advice are emerging and more research is needed into the various procedures as we gain insight and experience.

References

1. CADTH. New Opportunity: Parallel Scientific Advice from CADTH and NICE. 6 February 2019. Available at: cadth.ca/news/new-opportunity-parallel-scientific-advice-cadth-and-nice. Accessed 16 October 2019.
2. NICE. NICE Collaborates with the Canadian Agency for Drugs and Technology in Health to Offer Parallel Scientific Advice. 6 February 2019. Available at: nice.org.uk/news/article/nice-collaborates-with-the-canadian-agency-for-drugs-and-technology-in-health-to-offer-parallel-scientific-advice. Accessed 16 October 2019.
3. CADTH. Health Canada and CADTH Launch New Initiative to Provide Early Parallel Scientific Advice. 1 March 2019. Available at: www.cadth.ca/scientific-advice. Accessed 16 October 2019.
4. Health Canada. Notice to Industry: Health Canada and CADTH Launch New Initiative to Provide Early Parallel Scientific Advice. 28 February 2019. Available at: canada.ca/en/health-canada/corporate/transparency/regulatory-transparency-and-openness/improving-review-drugs-devices/notice-early-panel-scientific-advice.html. Accessed 16 October 2019.
5. CADTH. Scientific Advice Program. 12 May 2019. Available at: cadth.ca/scientific-advice/about. Accessed 16 October 2019.
6. Bending, M. Early Integrated Scientific Advice: A Key for Optimal Pricing, Reimbursement & Market Access?. Presented at World Pharma Pricing and Market Access, Amsterdam. 19 March 2019.

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