Review of published efficiency opinions of the French economic and public health assessment committee (CEESP)

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BACKGROUND

- Since 2013, innovative products claiming a clinical added value (Amélioration du Service Médical Rendu – AMSR) level ≤III with a substantial impact on the healthcare expenditure (≥€20 million the second year) are evaluated by the French economic and public health assessment committee (Commission Evaluation Economique et de Santé Publique - CEESP).
- In efficiency opinions, CEESP provides recommendation on the expected efficiency of health technologies, to support the price negotiation between the economic committee for health products (Comité Economique des Produits de Santé - CEPS) and the sponsor.[1]
- The negotiation price relies on the ASMR granted, assessed by Transparency Committee (from level I major improvement, to level V no improvement).[2]
- In July 2017, a previous analysis assessed deviations from the French pharmacoeconomic guidelines in the first 19 CEESP opinions and reported 243 methodological concerns (MCs).[3]
- As of May 2019, four times more opinions were available.
- This study aimed at :
  - reviewing opinions published by the CEESP, to summarize MCs,
  - comparing time of price negotiation according to ASMR granted and/or major MCs raised in efficiency opinions.

METHODS

- The French Health Agency (Haute Autorité de Santé - HAS) website[4] was screened up to May 2019.
- For each opinion, relevant data such as the product name, the publication date, the ASMR claimed, the model type used for cost-effectiveness analysis, etc., have been extracted.
- Key deviations from guidelines spotted by the CEESP giving rise to MCs were extracted as well, and classified into two levels (Table 1).

Table 1. Two-level classification description of MCs

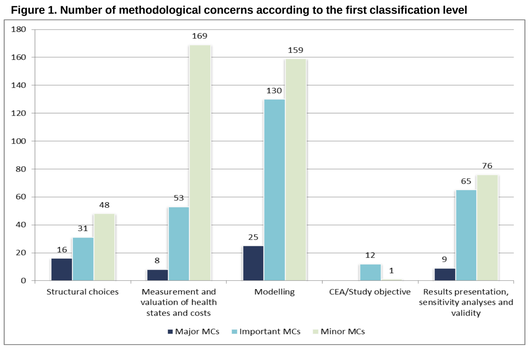
Level 1	Level 2 (main classifications)
Structural choices	• Economic analysis and choice of outcome criterion • Time horizon / Perspective / Model structure • Comparison of strategies
Measurement and valuation of health states and costs	• Costs / Cost type • Measurement and calculation • Health states • Valuation / Measurement (methods and data)
Modelling	• Transition estimates • Data extrapolation / Estimation method • Reporting • Efficacy data source • Modelled population / Model structure • Programming errors
CEA/Study objective	-
Results presentation, sensitivity analyses and validity	• Sensitivity analyses / Deterministic or probabilistic / Scenario • Presentation of results • Validity (internal and external) / Study limitations

- The French republic official journal (Journal officiel de la République française – JORF) was also screened, in order to obtain the price publication date, when available.[5]
- Descriptive statistics were performed to highlight the frequency by level, subtopic, and classification of MCs (major, important or minor).
- In order to assess the impact of ASMR and/or presence/absence of major MC on the time to price availability (time between CEESP opinion's validation and price publication), a few assumptions have been made:
  - This analysis focused on drugs evaluated as part of a first registration (guaranteeing the durations comparability).
  - When multiple ASMR levels were assigned due to the assessment of multiple populations for a drug for the same indication, the best ASMR was considered.

RESULTS

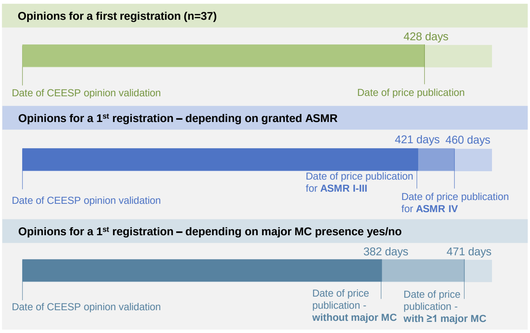
- 88 efficiency opinions for pharmaceutical products were identified. About 40% of these CEESP assessment reports were relative to oncology (n=38), about 12% to infections (n=10), and around 10% to medical devices (n=9).

Figure 1. Number of methodological concerns according to the first classification level



- Overall, 802 MCs were identified (Figure 1).
- These included 58 major (7%), 291 important (36%) and 453 minor (57%) concerns, mostly regarding "modelling" (n=314, 25 major), "measurement and valuation of health states, costs or quality of life" (n=230, 8 major), and "results presentation and sensitivity analyses" (n=150, 9 major), as described in Figure 1.
- Among the 88 CEESP opinions assessed:
  - 36 reported ≥1 major MC
  - 55 were assessed for a first registration
  - 37 had a price published at the time of the analysis

Figure 2. Median duration between date of opinion validation by CEESP and date of price publication in the 'Journal Officiel'



- The mean price negotiation duration was 1.2 years (Figure 2, table 2). This duration was higher in dossiers for drugs granted an ASMR IV (vs I-III), or when ≥1 major concern was reported.

Table 2. Main results of CEESP opinions, according to the ASMR granted (for ASMR II to V)

ASMR level granted	II	III	IV	V	Total
# of opinions	6	18	37	17	**78**
# opinions with ≥1 major MC	3 (50%)	6 (33%)	16 (43%)	8 (47%)	**33 (42%)**
# opinions for a 1st registration	5 (83%)	11 (61%)	21 (57%)	13 (76%)	**50 (64%)**
# of opinions for a 1st registration (negotiation duration available)	5 (83%)	9 (50%)	15 (41%)	6 (35%)	**35 (45%)**
# of major MCs (SD)	1.00 (1.22)	0.91 (1.38)	0.81 (0.98)	0.62 (0.87)	**0.78 (1.03)**
Negotiation duration in days (SD)	352 (220)	459 (431)	460 (333)	319 (97)	**428 (315)**
# of opinions for a 1st registration, 0 major MC	2 (40%)	6 (66%)	6 (40%)	4 (66%)	**18 (51%)**
Negotiation duration in days (SD)	184 (91)	252 (125)	624 (309)	315 (121)	**382 (261)**
# of opinions for a 1st registration, ≥1 major MC	3 (60%)	3 (33%)	9 (60%)	2 (33%)	**17 (49%)**
Negotiation duration in days (SD)	465 (214)	874 (563)	362 (321)	329 (49)	**471 (360)**

DISCUSSION

- Although number of opinions analysed is <100, this analysis is based on an exhaustive set of opinions, and naïve tendencies can be described.
- The ASMR granted and the presence of a major MC in the efficiency opinion published by the CEESP seem to have an impact on the price negotiation time.
- This duration seems to be longer when an AMSR IV is granted, vs an ASMR I-III (+ ~40 days in average), and when a major MC is reported (+ ~ 90 days in average, unless if an ASMR V is granted).

CONCLUSIONS

- CEESP has high expectations regarding methodological quality of efficiency dossiers (≈40% of opinion reporting ≥1 major MC), and/or industry still shows difficulties to conduct appropriate economic analyses.
- Industry has to keep in mind the potential but non-negligible impact of cost-effectiveness analysis and the corresponding CEESP opinion, on duration of price negotiations.

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