

# Cross analysis of HAS conclusions on products with an economic opinion disclosed in 2022

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## Introduction

In France, for innovative treatments, the price negotiations are based on the conclusion of two independent HAS committees:

- The **CT (Transparency Committee)** provides recommendations on reimbursement decision through the ASMR (Clinical Added Value). An ASMR of I to III is a prerequisite for negotiating a higher list price than that of relevant comparators.

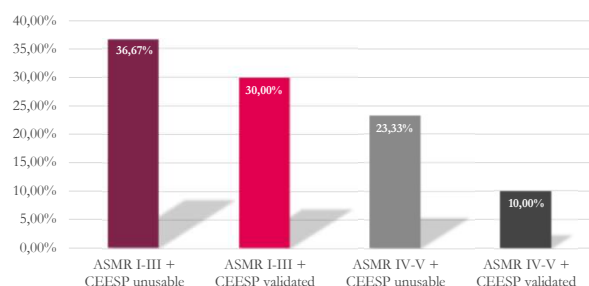
- The **CEESP (Economic & Public Health Assessment Committee)** gives an opinion on the methodological acceptability of the health-economic evaluation. A valid evaluation brings key information for price stability and net price negotiation. No correlation is necessarily expected a priori between the ASMR level and the methodological acceptability of the economic evaluation.

The objective of the study is to determine the situations in which the economic opinions disclosed in 2022 are a key issue in the price negotiation.

## Results

### CEESP Validation

Figure 2. Proportion of CEESP economic dossier according to ASMR and CEESP validation in 2022



In 2022, both a CT and a CEESP opinion was disclosed for 28\* treatments. The CT attributed two different ASMR in 2 dossiers, so we have 30 ASMR for 28 dossiers. An ASMRs I to III concern approximately 70% of ASMRs. In these situations, the CEESP's opinion could be a key of negotiation if it provides useful economic information. However, unusable CEESP dossiers are invalidated, non-evaluable or dominated.

➡ The CEESP invalidated approximately 50% of the economic dossiers irrespective of the obtained ASMR: 10/19 Health economic assessment were rejected when an ASMR I-III was granted, 5\*\*/8 when an ASMR IV-V was granted respectively. An invalidated dossier is one with a major reservation or major uncertainty. Furthermore, without an explicit invalidation, economic analysis couldn't be useful when the conclusion is a dominated product or in absence of result. So, near of 60% of economic analysis weren't usable.

### ICER

For ASMR I-III, the minimum ICER is €7,392/QALY and the maximum is €559,779/QALY. For ASMR IV-V, the minimum ICER is €30,017/QALY and the maximum is €379,317/QALY.

2 dossiers were invalidated by the CEESP because the health technologies were dominated. These results are consistent with the conclusion of the CT, which awarded a SMRI in this indication.

Despite the health technology was dominant, the dossier was invalidated due to major global uncertainty.

In parallel, a €240 000/QALY average ICER was observed for treatments with an ASMR I-III versus a €105 000/QALY average ICER for treatments with an ASMR IV-V.

## Conclusion

If Economic dossier invalidation was not correlated to final ASMR granted, treatments with an ASMR I-III were associated to a **250% higher average ICER** than treatments with an ASMR IV-V. It shows how useful a **valid ICERs could be for price negotiation** in situation where expected higher incremental benefits seemed counterbalanced by even higher price expectations. Stronger efforts should be made to both avoid invalidation of the economic dossier.

## References

1. Vyoo Agency efficiency database. Online subscription only : <https://efficiency.vyoo-agency.com/>
2. Choices in methods for economic evaluation – HAS. 2020. [https://www.has-sante.fr/upload/docs/application/pdf/2020-11/methodological\\_guidance\\_2020\\_-\\_choices\\_in\\_methods\\_for\\_economic\\_evaluation.pdf](https://www.has-sante.fr/upload/docs/application/pdf/2020-11/methodological_guidance_2020_-_choices_in_methods_for_economic_evaluation.pdf)
3. CEESP Doctrine. [https://www.has-sante.fr/upload/docs/application/pdf/2021-09/doctrine\\_de\\_la\\_ceesp.pdf](https://www.has-sante.fr/upload/docs/application/pdf/2021-09/doctrine_de_la_ceesp.pdf)

## Methods

Using Vyoo Agency efficiency database<sup>1</sup>, all available Health Economic appraisal published between **January 1 and until December 31, 2022**, were reviewed to cross the conclusions of each commission.

Figure 1. Proportion of CEESP opinions by therapeutic area

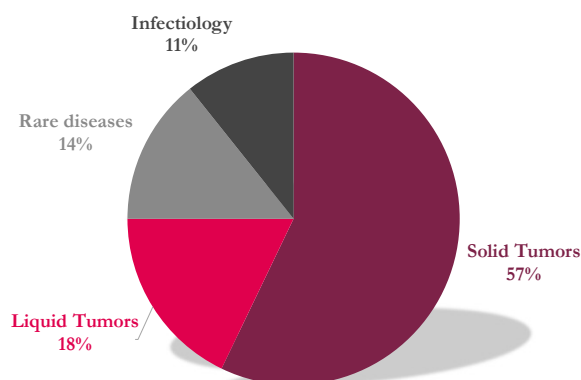


Figure 3. Proportion of CEESP validation and ASMR level in 2022

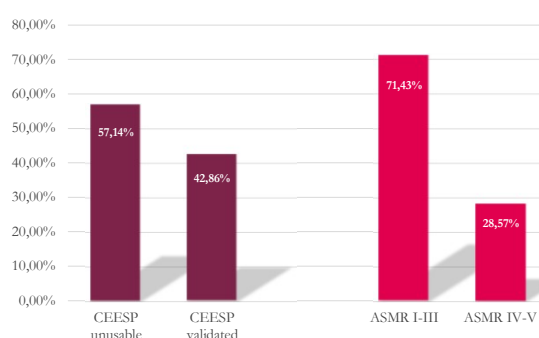
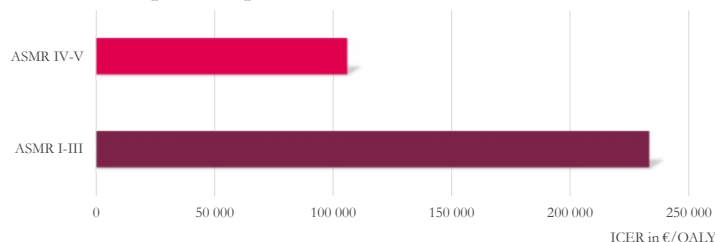


Figure 4. Average ICER based on ASMR level



\*instead of 27, as the database was updated, and 1 economic dossier implemented.  
\*\*instead of 4, as the database was updated, and 1 economic dossier implemented.