

Cross-analysis of HAS conclusions on products with an economic opinion disclosed in 2023

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Introduction

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

- The **CT (Transparency Committee)** provides recommendations on reimbursement decisions based on 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.

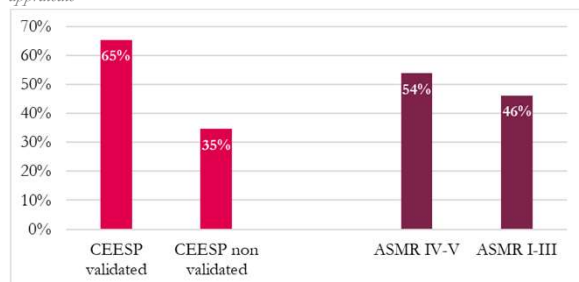
No correlation is necessarily expected *a priori* between the ASMR level and the methodological acceptability of the economic evaluation.

The objective is to describe the situations in which the **economic opinions published in 2023 are a key issue in the price negotiation**, i.e. invalidated economic evaluation with an ASMR I to III or a demonstration of the dominance of the product.

Results

Descriptive and Cross-analyses of CT and CEESP Conclusions

Figure 2. Proportion of CEESP validation and ASMR levels in 2023 on 26 appraisals



In 2023, 25 treatments had been appraised resulting in 26 ASMRs (one treatment is associated with two ASMRs).

An ASMR I to III concerns about 46% of ASMRs. In these situations, the CEESP's opinion could be a key to negotiations if it provides useful economic information.

The CEESP validated approximately 65% of the economic analysis irrespective of the obtained ASMR.

The **cross-analysis of CT and CEESP conclusions** shows that only 31% (8/26) of ASMR I-III products had a validated health economic assessment to support the price negotiation. This is lower than for the ASMR IV-V, which are supported by a validated ICER in 35% (9/26) of the cases.

French validated ICERs in 2023

In 2023, The CEESP's economic opinions covered 28 ICERs because of the sub-populations involved. For one sub-population, the validated result was dominant. In all other situations, the product evaluated was more expensive and more effective than one comparator. The average ICER was €394,882/QALY.

An average ICER of **€362,067/QALY** was observed for treatments with a validated ICER compared to an average ICER of **€500,383/QALY** for treatments with an invalidated ICER.

The average ICER, regardless of CEESP's opinion on its validity, was higher for treatments with an obtained ASMR I-III than for treatments with an obtained ASMR IV-V (**€620,774/QALY versus €208,378/QALY**). One product was dominant in a subpopulation with an ASMR III.

Conclusion

As expected, no correlation is observed between the ASMR level and the methodological acceptability of the economic evaluation. Treatments that demonstrated an innovative value (ASMR I-III added-value rated by the CT) were associated with an average ICER 300% higher than treatments with an ASMR IV-V, suggesting a relationship between expected incremental benefits and price expectations. Given the societal benefit of a valid ICER for price negotiations, greater efforts should be made by all stakeholders to agree on methodological approaches to provide useful economic assessment.

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
3. CEESP Doctrine. https://www.has-sante.fr/upload/docs/application/pdf/2021-09/doctrine_de_la_ceesp.pdf

Methods

Using **Vyoo Agency efficiency database¹**, opinions published between January 1st and December 31st, 2023, were reviewed to cross the conclusions of both commissions.

Figure 1. Proportion of CEESP opinions by therapeutic area

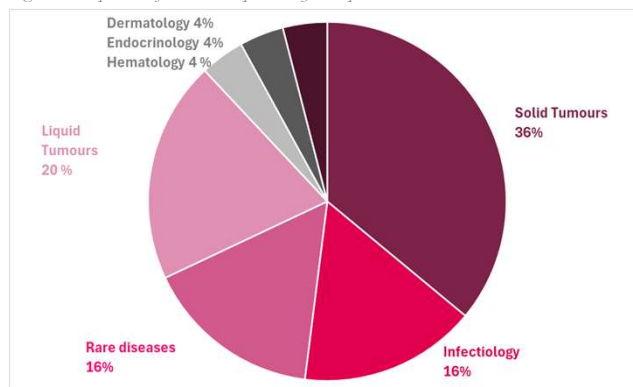


Figure 3. The proportion of validated ICER according to ASMR in 2023

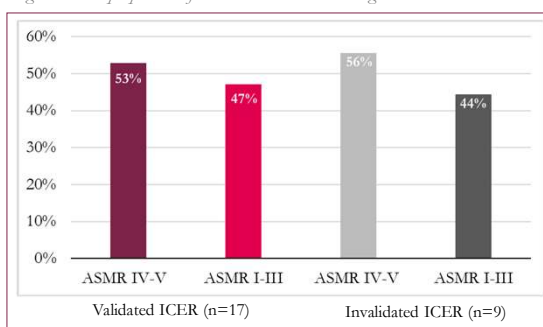


Figure 4. Average ICER based on HAS appraisal

