

Pragya Shukla, MSc¹, Victoria Paly, MHS², Irina Proskorovsky, MSc³ Luis Hernandez, PhD, MPH, MSc²

¹Evidera Inc., Montreal, Canada, ²Takeda Pharmaceuticals America, Inc., Lexington, MA, USA ³Evidera Ltd., Madrid, Spain

Background and Objectives

- The establishment of a framework for the European Health Technology Assessment (HTA) process is gaining momentum.
- Following the release of the initial draft Implementing Act on Joint Clinical Assessments (JCA), the Member State Coordination Group on HTA (HTACG) has issued two pivotal guidance documents: "Methodological Guideline for Quantitative Evidence Synthesis: Direct and Indirect Comparisons"¹ and "Practical Guideline for Quantitative Evidence Synthesis: Direct and Indirect Comparisons."²

- The methodological guidelines describe different methods for direct and indirect comparisons, such as pairwise meta-analysis, network meta-analysis, population-adjusted indirect treatment comparison, and the use of non-randomized evidence. They also address assumptions, strengths, and limitations associated with each method.¹ The practical guidelines provide details on implementation of these methods and specify reporting requirements for Health Technology Developers (HTD).

- These guidelines play an important role in addressing the population, intervention, comparator, and outcome (PICO) questions in JCAs.
- The aim of this work was to review and map these documents into a practical decision algorithm to inform JCA dossier preparation planning.

Methods

- We conducted a comprehensive review of the HTACG Quantitative Evidence Synthesis Guidelines on Direct and Indirect comparisons.
- Key criteria, methodological requirements, recommendations, preferences, and reporting requirements were identified and extracted.
- The extracted information was then used to construct a step-by-step flowchart for decision-making processes based on specific context and available evidence and presented in a simplified and accessible format.

Key Takeaways

- A rigorous systematic review of the relevant literature and evidence (e.g., external control arm) with explicit inclusion and exclusion criteria is a prerequisite before conducting any direct and indirect treatment comparison and must address the PICO-based research question (Figure 1).
- Randomized controlled trials (RCTs) are the gold standard for informing estimates of treatment effectiveness and should be used for evidence synthesis when possible (Figure 2).
- A list of potential effect modifiers and/or prognostic factors should be drawn up a priori (i.e., before the evidence synthesis is performed).
- A fundamental assumption for evidence synthesis (direct and indirect comparisons) is exchangeability, which should be investigated by assessing similarity, homogeneity and, for indirect comparisons, consistency.
 - If the assumption is violated, the results of the corresponding evidence synthesis are unlikely to provide a meaningful estimate of treatment effectiveness.
- If the similarity assumption is not met, methods for population-adjusted indirect comparisons might be considered, provided that the network is connected, and individual patient data (IPD) are available for some included trials.
- With non-randomized data, such as observational evidence and single-arm trials, or in the case of disconnected networks, complete access to IPD is required to apply methods that can adequately adjust for confounding.

Figure 1. PICO Framework

Population	Patients or population(s) in which the intervention under assessment should be used
Intervention	Therapeutic, diagnostic, or preventive intervention under assessment (including posology, dosage, and MOA)
Comparators	Alternative intervention(s) against which the intervention under assessment should be compared in the JCA dossier
Outcomes	Relevant efficacy and safety outcomes across EU

Figure 2. Hierarchy of Evidence

Direct evidence from adequate RCT with low RoB and adequate sample size.	Underlying assumption of exchangeability holds
Indirect evidence from RCT comparing relative effect across treatments using a common comparator.	Cannot ensure balance of known and unknown effect modifiers to the same extent as single RCT. However, when direct evidence informing a comparison of interest is not available, comparisons using indirect evidence need to be tried.
Non-randomized Evidence (single-arm trials, cohort studies, case-control studies, other observational studies and the use of historical controls) with access to full IPD	Methods for non-randomized studies can be used, e.g., propensity score (requires full IPD). The assumption of conditional exchangeability must be met and can be assessed by investigating the properties of positivity, overlap, and balance
Non-randomized Evidence with limited or no access to IPD	When non-randomized evidence is available only at the aggregated data level, there are no adequate methods available for reliable estimation of treatment effectiveness.

Roadmap for Direct and Indirect Comparisons

1 Assess Network of Evidence

- Evidence networks for indirect comparisons determine which methods are potentially applicable and should be constructed systematically from the PICO question(s) to avoid bias.

Figure 3. Different Types of Networks of Evidence

Connected Network Using RCTs (simple loop)—Bucher's ITC or NMA

Connected Network Using RCTs (complex)—NMA

Disconnected Networks with no IPD or IPD from only one study—no gold-standard method and highly problematic in context of JCA

Disconnected Networks with full IPD—lack of randomization can be compensated by rigorous adjustment for confounding (e.g., using propensity score methods)

2 Identify and List All Potential Effect Modifiers and/or Prognostic Factors

- A list of potential effect modifiers and/or confounders should be drawn up a priori (i.e., even before the evidence synthesis is performed), and the process should be comprehensive and transparently reported.
- The process should include a comprehensive review of the literature and consultation with healthcare professionals (statistical tests should not be used in isolation to justify the selection).
- The set of all identified, potentially relevant effect modifiers and/or confounders should be reported in the submission dossier.
- Unavailability of data on a relevant effect modifier and/or confounder from one or more studies should be clearly reported as a limitation in the JCA report.
 - Possibility to consider proxies for the missing effect modifier in the assessment of similarity (sufficient evidence is needed to validate the proxy).

3 Check Assumption of Exchangeability

Testing the Assumption	What if assumption fails?
Similarity: <ul style="list-style-type: none">Assess the similarity of following aspects:<ul style="list-style-type: none">Study and patient characteristics (effect modifiers and prognostic factors)Characteristics of the intervention and the comparator (dosage, application, and concomitant treatments)Characteristics of outcomesObserved values of relevant outcomes at baseline Homogeneity: <ul style="list-style-type: none">Heterogeneity can be clinical, methodological and statisticalQ statistic (Q-test), heterogeneity measure I², graphical inspection of forest plot Consistency: <ul style="list-style-type: none">Assess consistency of direct and indirect evidence by:<ul style="list-style-type: none">Bucher's method (Frequentist; simple loop network)Inconsistency models (Bayesian)Node splitting methods (Bayesian)	<ul style="list-style-type: none">In case if at least one of the components of the exchangeability assumption is not valid, following alternative approaches can be used to answer the PICO question:<ul style="list-style-type: none">Splitting into subgroupsUse of (network) meta-regressionExclusion of studiesSensitivity analysesPAIC (STC/MAIC/ML-NMR)Subgroup analyses are often more useful than meta-regression, as they can help in targeting the right intervention for the right subgroup of patients.Limitations and assumptions of each of these methods should be consideredThese options could lead to formation of new networks, therefore, subsequent testing of assumptions might be needed

4 Select Statistical Method for Direct and Indirect Comparisons

- Before undertaking any analyses, a statistical analysis plan is required.
- The following flowcharts can be used to select the appropriate method for direct or indirect comparisons.
- Not all methods for indirect comparisons are equally acceptable for JCA (refer to the color scheme). Assumptions associated with each method should be validated, and reporting requirements should be adhered to.

Figure 4. Methods for Direct Comparisons

Figure 5. Methods for Indirect Comparisons

Conclusions

- The proposed decision algorithm synthesizes HTACG guidelines for direct and indirect comparisons, serving as a valuable tool for researchers and practitioners. It enhances the transparency, consistency, and credibility of evidence synthesis, aligning with HTACG's emphasis on high-quality evidence.
- Additionally, the review highlights significant challenges that need to be addressed in the new HTA process, especially when the available methods for answering specific PICO questions are insufficient. This is particularly problematic for non-randomized evidence, especially in the context of single-arm trials and rare diseases.

- Scoping and systematic literature review synthesis should start early to identify available evidence to allow HTDs sufficient time and budget for collecting and analyzing comparator data sources with IPD access, such as real-world evidence, registries, and chart review studies.
- While the guidelines outline several innovative and complex methodologies, they lack concrete implementation details in certain areas.

References

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Abbreviations:

Ag = Aggregate data; IPD = individual patient data; ITC = indirect treatment comparison; JCA = Joint Clinical Assessments; MAIC = matching-adjusted indirect comparison; ML-NMR = multilevel network meta-regression; MOA = mode of administration; NMA = network meta-analysis; PAIC = population-adjusted indirect comparison; PICO = population, intervention, comparator, outcome; RCT = randomized controlled trial; RoB = risk of bias; STC = simulated treatment comparison

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