

Use of Off-Label Comparators in Health Technology Assessment in Portugal: A Review of Reimbursement Appraisals Reports

HTA170

PAULA MATOS¹, DIOGO MENDES^{1,2}, FRANCISCO BATEL MARQUES^{1,2} and CARLOS ALVES^{1,2}

¹ University of Coimbra, Faculty of Pharmacy, Laboratory of Social Pharmacy and Public Health, Coimbra, Portugal
² Clevidence, Lda. Porto Salvo, Portugal.

INTRODUCTION

Health Technology Assessment (HTA) is a multidisciplinary process that assess the therapeutic and/or economic value of a new intervention when comparing to other therapeutic alternatives at different points in its lifecycle. When used routinely in clinical practice for an off-label indication, a medicine may be used as a comparator in an HTA procedure.

OBJECTIVE

This study aims to characterise the frequency of use of off-label comparators and the outcomes of the Reimbursement Appraisals Reports in Portugal.

METHODS

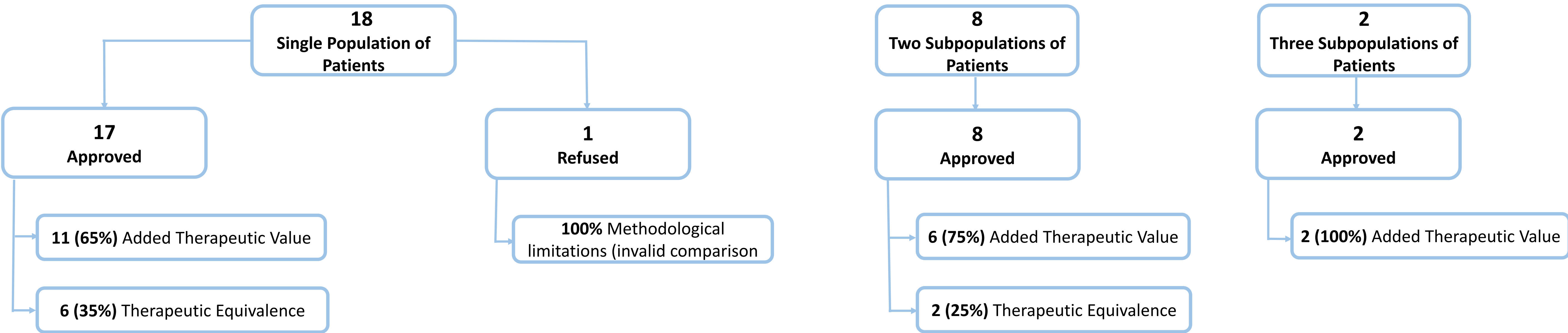
Through research on the INFARMED, I.P, the Reimbursement Appraisal Reports of medicines published between 2022 and 2023 were identified, retrieving the following data: therapeutic indication under assessment, intervention, comparator(s), conclusions of the therapeutic and economic assessments, and reimbursement recommendation. Summaries of Product Characteristics (SmPC) of comparator alternatives were reviewed to identify off-label indications. Descriptive statistics were used for data analyses with Microsoft Excel®.

RESULTS

Of the 109 appraisal reports identified, 28 (26%) used off-label comparators and 81 (74%) used on-label comparators in assessment procedure. Most of the appraisals using off-label comparators (n=27; 96%) issued favorable reimbursement recommendations, with 19 (70%) concluding on the existence of added therapeutic value (ATV) for the intervention under evaluation, and 8 (30%) concluding for therapeutic equivalence between the intervention and the comparators. One (4%) report issued an unfavorable reimbursement recommendation due to the use of inappropriate comparative methods to assess therapeutic value.

Of the 81 appraisal reports using on-label comparators, 71 (88%) issued favorable reimbursement recommendations [48 (58%) concluding for ATV and 23 (42%) concluding for therapeutic equivalence]. Ten appraisals issued unfavorable reimbursement recommendations due to methodological limitations (n= 3; 30%) or lack of evidence/valid comparison method (n= 7; 70%) when assessing the therapeutic value.

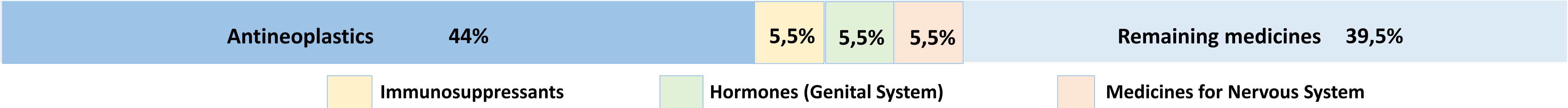
28 Reimbursement Appraisal Reports that used OFF-LABEL COMPARATORS



Reimbursement Appraisal Report REFUSED

The rejection of this Reimbursement Appraisal Reports was not caused by the use of off-label comparators, but the use of an invalid comparative method – indirect comparison. This method has a high potential for bias, and is therefore only recommended in exceptional situations, such as rare and ultra-rare diseases.

Most Frequently Evaluated Medicines



CONCLUSIONS

The selection of off-label comparators is a common practice in the HTA procedure, particularly in the context of oncological diseases. The results suggest that Reimbursement Appraisals Reports using off-label comparators do not lead to higher rates of unfavorable recommendations, despite there being few cases where scientific evidence is presented to support the use of a comparator in an unapproved therapeutic indication. Comparisons with Reimbursement Appraisals Reports from other countries should be useful to characterise additional practices and identify further conclusions.

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