

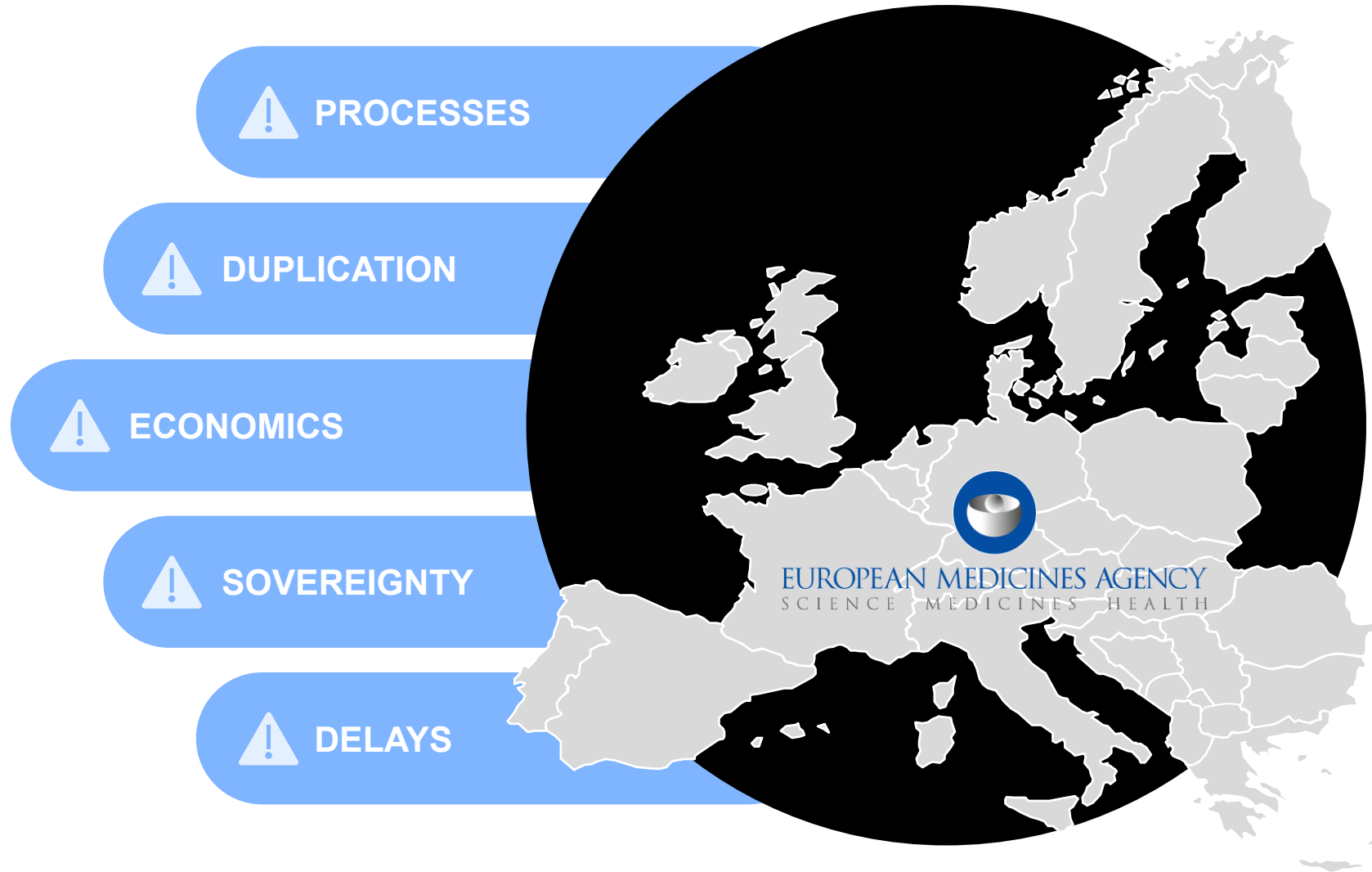
DOLON

Pulling back the curtain on Joint Clinical Assessment

Emilie Neez

All opinions my own!

Same script, different cast



Waiting for the final (Implementing) Act

Practical questions

EU-LEVEL IMPLEMENTATION

- What will the JCA process be?
- What will the report cover vs. not cover?
- How will stakeholders be involved?

COUNTRY-LEVEL IMPLEMENTATION

- How might countries adapt their national HTA/P&R processes in the short/medium term?
- What systems will be established to monitor the implementation of JCA recommendations at country level?

EVIDENCE & PICOs

- What type of evidence does the JCA require and favour?
- What is the process for PICO selection?

Stage directions are generally clear



Knowns

- ✓ JCA timelines
- ✓ JCA dossier & report content
- ✓ Governance & stakeholder interactions

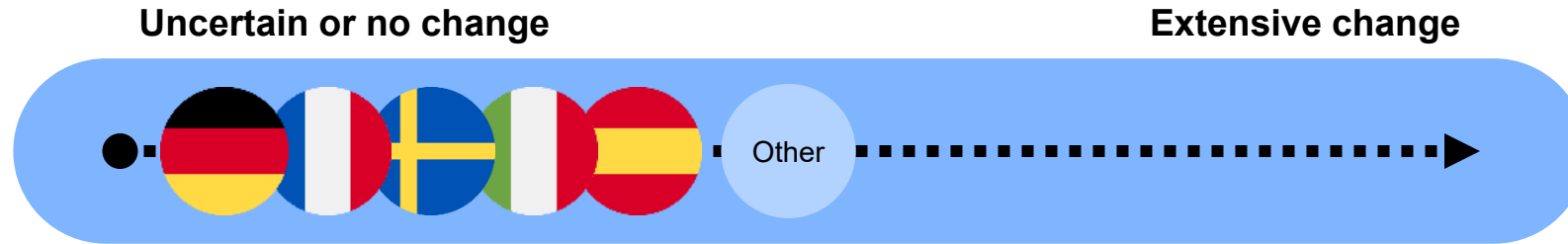
Uncertainties

- ? Interactions with EMA
- ? Conflict of interest management
- ? Impact of patients and clinical experts

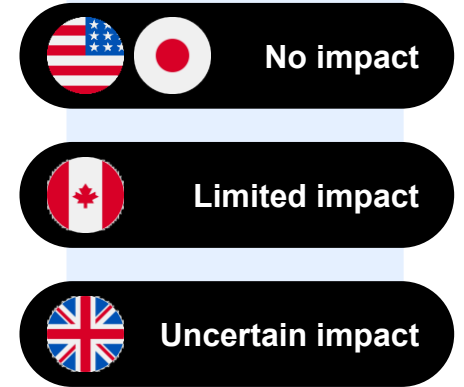
Sources: Commission Implementing Act on the JCA; Implementation rolling plan

How actors might play remains to be seen

Hypothesised extent of change in national processes vs status quo within ~3 years



Ex-EU hypotheses



Knowns

- ✓ Implementation by *some* countries
- ✓ Requirement for “due consideration”
- ✓ Data requests restrictions

Uncertainties

- ? Implementation by *all* countries & resourcing
- ? Justification of deviations
- ? Impact of limited use of JCA reports

Sources: Spanish Ministry of Health; Dolon hypotheses

The thorny drama: PICOs and evidence requirements

Need for PICO consolidation

1L NSCLC

10 PICOs

50% requested by single country

280 analyses requested

50% indirect analyses

3L MM

16 PICOs

75% requested by single country

720 analyses requested

69% indirect analyses

JCA evidence hierarchy

RCTs

RWE

SAT

Knowns

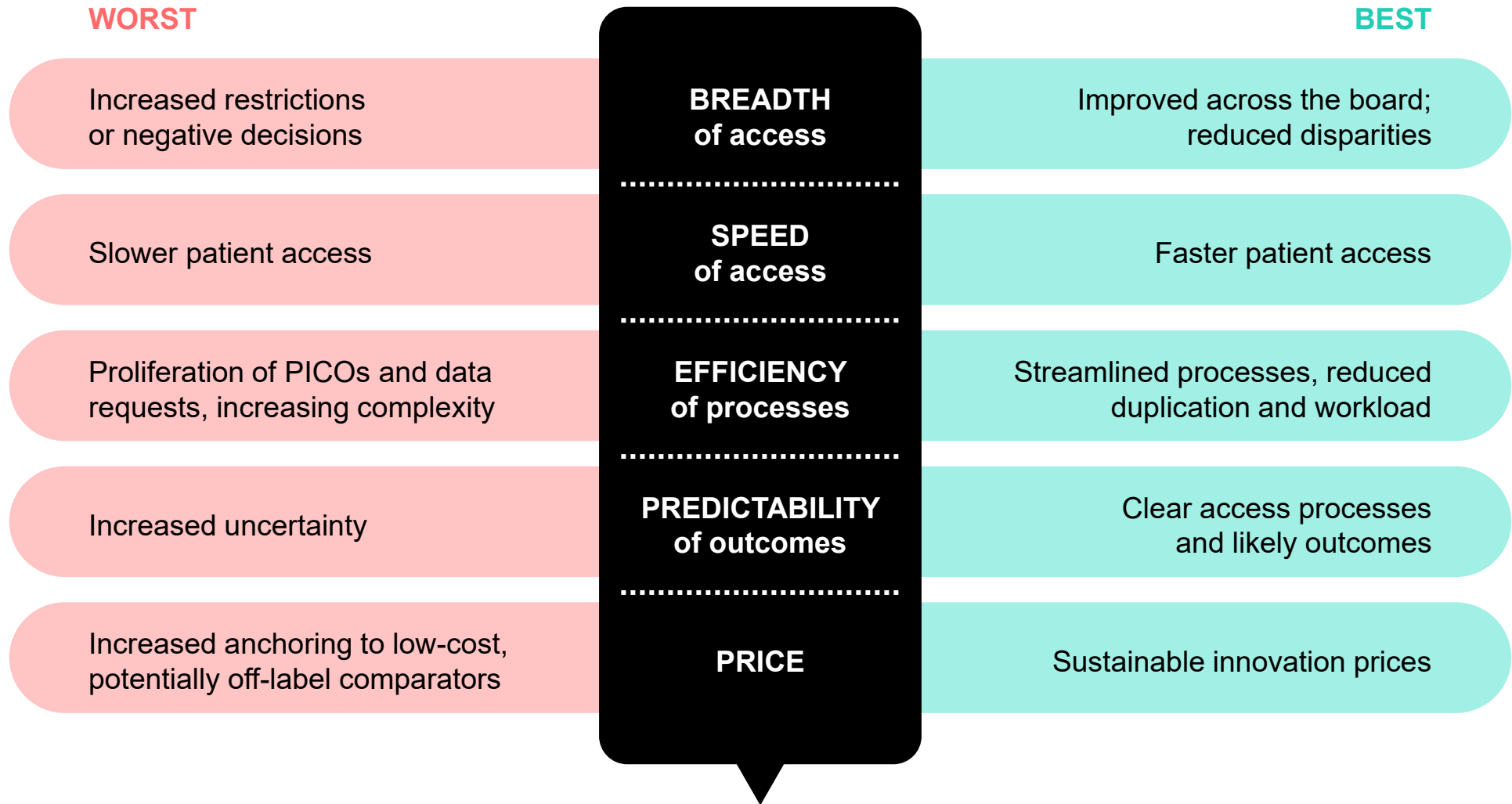
- ✓ Evidence reporting requirements
- ✓ Process for PICO selection
- ✓ Strict evidence hierarchy

Uncertainties

- ? Integration of additional evidence
- ? Approach to PICO consolidation
- ? Adaptations to orphan specificities

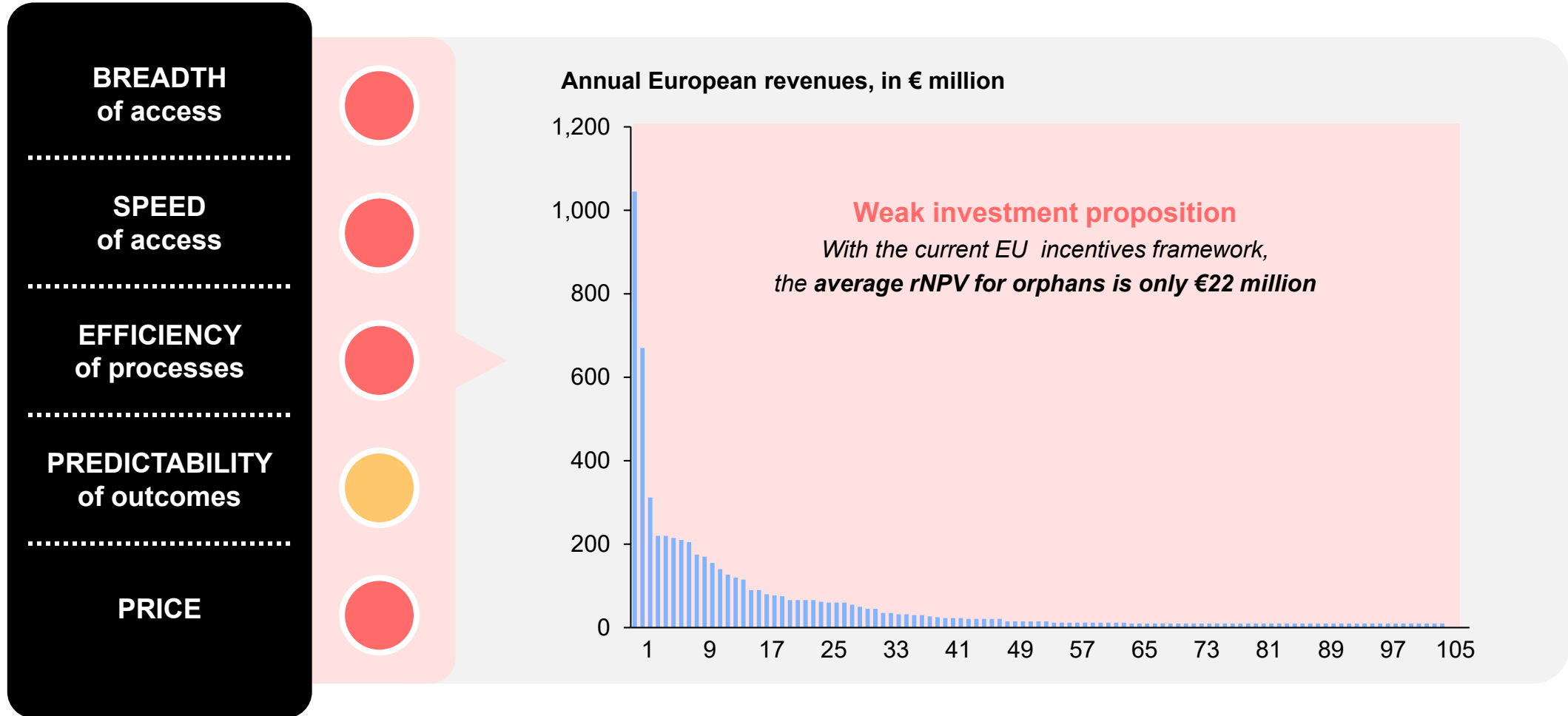
Sources: Guidance on outcomes for joint clinical assessments; Practical guideline for quantitative evidence synthesis: direct and indirect comparisons; Guidance on validity of clinical studies; Van Engen et al. The Impact of Additive Population(s), Intervention, Comparator(s), and Outcomes in a European Joint Clinical Health Technology Assessment

How the plot might twist



Critical factors in launch and innovation decisions

Could JCA be the hero?



Sources: European Commission Staff Working Document on Orphan and Paediatric Regulations; Dolon Impact Assessment on the Orphan Regulation

Mario Draghi thinks so

		Time horizon		
		Short term	Medium term	Long term
<i>Summary of pharma proposals</i>				
1	Maximise the impact of the EU Health Data Space	✓	✓	
2	Streamline the set-up and management of multi-country trials		✓	
3	Expedite access through coordinated action by medicines agencies, HTA authorities and payers on guidance to industry, P&R as well as procurement		✓	
4	Provide clear and timely guidance on the use of AI		✓	
5	Rapidly and fully implement the HTA regulation and ensure the required resources are allocated to ensure the delivery of JCA as of 2025, with the aim of establishing an EU agency in the long term	✓		✓
6	Improve business predictability through a continuous evidence-based dialogue with stakeholders to underpin EU policy-making on protection mechanisms for novel medicines		✓	✓
7	Increase and focus public R&D investment in the EU		✓	
8	Mobilise private R&D investment in the EU		✓	
9	Develop strategic international partnerships		✓	✓

Sources: The future of European competitiveness. Part B | In-depth analysis and recommendations

But the risk is real

WORST

Increased restrictions or negative decisions



Slower patient access



Proliferation of PICOs and data requests, increasing complexity

Increased uncertainty

Increased anchoring to low-cost, potentially off-label comparators



**BREADTH
of access**

**SPEED
of access**

**EFFICIENCY
of processes**

**PREDICTABILITY
of outcomes**

PRICE

Risk for JCA to be an expansion of German requirements – without the matching willingness-to-pay

How to avoid a tragedy

Some pending questions

- 1 County-level changes
- 2 PICO consolidation methodology
- 3 Rules for patient and KOL involvement
- 4 Adaptations to orphan specificities
- 5 Evolution of JCA over time

Recommendations for manufacturers

- 1 Anticipate PICO requests
- 2 Rethink pre-launch timelines & processes
- 3 Build capacity in stat & HEOR teams
- 4 Consider JCA evidence requirements
- 5 Engage with stakeholders where possible