



SHPA response to the Health Technology Assessment (HTA) Policy and Methods Review – Consultation 2, Feb 2024

Please select which chapter/s you would like to provide feedback on. You may provide feedback on as many or few chapters as you wish.

- 1. Transparency, communication, and stakeholder involvement in HTA
- 2. Health technology funding and assessment pathways
- 3. Methods for HTA for Australian government subsidy (technical methods)
- 4. Health technology funding and purchasing approaches and managing uncertainty
- 5. Futureproofing Australia's systems and processes

Now please select the topics within the chapter(s) you would like to provide feedback on...

1. Transparency, communication, and stakeholder involvement in HTA

- 1.1. Transparency and communication of HTA pathways, processes and decisions
- 1.2. Consumer, clinician and other stakeholder engagement and consideration in HTA
- 1.3. First Nations people involvement and consideration in HTA
- 1.4. State and territory government collaboration in HTA

2. Health technology funding and assessment pathways

- 2.1. Streamlining and aligning HTA pathways and advisory committees
- 2.2. Proportionate appraisal pathways

3. Methods for HTA for Australian government subsidy (technical methods)

- 3.1. Determination of the Population, Intervention, Comparator, Outcome
- 3.2. Clinical Evaluation Methods
- 3.3. Economic evaluation

4. Health technology funding and purchasing approaches and managing uncertainty

- 4.1. Approaches to funding or purchasing new health technologies
- 4.2. Approaches to incentivise development of products that address antimicrobial resistance (AMR)
- 4.3. Understanding the performance of health technologies in practice

5. Futureproofing Australia's systems and processes

- 5.1. Proactively addressing areas of unmet clinical need and gaps in the PBS
- 5.2. Establishment of horizon scanning programs to address specific informational needs within HTA and the health system
- 5.3. Consideration of environmental impacts in the HTA
- 5.4. Mechanisms for continuous review and improvement
- 5.5. Capacity and capability of the HTA system
- 5.6. Strengthen international partnerships and work-sharing

1.1. Transparency and communication of HTA pathways, processes and decisions

Taking all Options within this section: 1.1. Transparency, communication and stakeholder involvement in HTA into account.



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Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Publish plain language summaries

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Improvements to the HTA webpage including development of a dashboard

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Publish plain language summaries

By providing plain language summaries, PBAC enhances transparency, allowing stakeholders to understand the rationale behind decisions and the evidence considered. This transparency fosters trust in the HTA process and promotes accountability.

Plain language summaries simplify complex information, making it more accessible to a wider audience, including patients, caregivers, and policymakers. This accessibility empowers patients and caregivers to make informed decisions about their healthcare and facilitates meaningful engagement in healthcare discussions.

Publishing PBAC guidelines also enhances consistency and clarity in decision-making. Clear guidelines help stakeholders navigate the HTA process, ensuring uniformity in submissions and evaluations. This clarity reduces ambiguity and improves the efficiency of the HTA process, ultimately leading to timely access to innovative therapies for patients.

Furthermore, the dissemination of plain language summaries and guidelines supports education and capacity building among healthcare professionals. By providing clear explanations of HTA processes and criteria, PBAC equips healthcare professionals with the knowledge and tools needed to engage effectively in the decision-making process, thereby promoting evidence-based practice.

These summaries will also assist with parallel HTA processes in the healthcare system including assessments and decisions made in Drugs and Therapeutic Committees and/or Formulary Committees in public and private health services.

Improvements to the HTA webpage including development of a dashboard

The development of a visual, data-driven dashboard for the HTA webpage offers significant benefits, including increased transparency, evidence-based decision-making, accountability, and stakeholder engagement. These improvements contribute to a more efficient, equitable, and responsive HTA system, ultimately improving patient access to high-quality healthcare technologies in Australia.

This dashboard can possibly also assist clinicians and health services who prescribe, dispense and administer these medicines and technologies, to prepare the capacity of their health services in anticipation of outcomes and decisions made by funders and regulators.



Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Further resourcing will be required to ensure these strategies aiming to enable transparency are delivered in a timely and reliable manner without impacting on the core functions of the TGA or PBAC.



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1.2. Consumer, clinician and other stakeholder engagement and considerations in HTA

Taking all Options within this section: 1.2. Consumer, clinician and other stakeholder engagement and considerations in HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Develop an engagement framework

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Strengthen consumer evidence

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Develop an engagement framework

By establishing clear mechanisms for involvement throughout the entire HTA process, from horizon scanning to post-market reviews, the framework ensures that diverse perspectives are integrated early and consistently. It also offers an opportunity to hear from the acute sector about the indications that should be considered to be included in the subsidy of certain technologies as is relevant to the hospital setting and to sub-groups of consumers.

Strengthen consumer evidence

These measures have the potential to enhance the quality, relevance, and inclusivity of HTA evaluations, ultimately leading to more informed decisions and improved patient outcomes. Consumer evidence can be even more important for technologies targeted at treating rare and less common diseases and conditions. However, effective implementation will require collaboration across stakeholders, clear communication, and ongoing evaluation to assess impact and address any challenges or barriers that may arise.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Once again, resourcing must be a consideration to enable the development of a robust engagement framework. Without adequate resources, there is a risk of tokenistic engagement or overburdening stakeholders, leading to disengagement or fatigue.

In addition, not all stakeholders may possess the necessary expertise or understanding of HTA processes to provide meaningful input. Ensuring the quality and relevance of stakeholder contributions requires ongoing education, training, and support to empower stakeholders to engage effectively.

Finally, it is imperative that these strategies do not introduce complexity and lengthen the HTA process, ultimately delaying consumer access to subsidised therapies.



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1.3. First Nations people involvement and consideration in HTA

Taking all Options within this section: 1.3. First Nations involvement and consideration in HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

A major issue impacting on First Nations peoples is their inability to access reduced co-payments of PBS medicines upon discharge from hospital. The proposed options in this paper do not address this significant issue that leads to lack of treatment poorer health outcomes for Aboriginal and Torres Strait Islander people. Hospital pharmacists must be enabled to supply medicines to Indigenous Australians under Closing the Gap PBS Co-Payment Measure.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

First Nations peoples partnership in decision making

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Dedicated resource for HTA submissions and education

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

First Nations peoples partnership in decision making

The establishment of a dedicated Advisory Committee and including a representative on the PBAC, ensures that First Nations perspectives and priorities are integrated into decision-making processes from the outset. This promotes cultural sensitivity, inclusivity, and responsiveness to the unique health needs and priorities of First Nations peoples.

SHPA recommends that the First Nations Advisory Committee has diverse representation including, Aboriginal Community Controlled Health Organisations (ACCHOs), non-ACCHOs, primary care, and both the private and public acute care settings, to ensure the committee considers the complete continuum of care in its decision-making.

Dedicated resource for HTA submissions and education

A dedicated resource for HTA submissions and education to assist organisations representing the health outcomes of First Nations peoples can help address barriers that may hinder meaningful participation, such as lack of familiarity with the HTA process or resource constraints.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Adequate support and a clear framework must be provided to sponsors to ensure that the new requirement to consider impact on First Nations peoples is applied in a meaningful way and does not pose a barrier to submissions.

In addition, SHPA reiterates its concerns outlined in [SHPA's submission to the HTA Policy and Methods Review – consultation 1](#), that the Closing the Gap (CTG) PBS Co-Payment Measure designed to help Aboriginal and Torres Strait Islander Australians access low cost or free PBS medicines, currently excludes medicines dispensed at discharge from public hospitals. The requirement for a co-payment to receive medicines at discharge from a public hospital, has resulted in ongoing inequity in the provision of medications. Without access to the Program, individual hospital policies (which require a co-payment as specified by PBS procedures) often prevent Indigenous patients from receiving their medicines at discharge to avoid incurring operational cost. If patients are unable or unwilling to pay the co-payment, they must



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attend a community pharmacy post-discharge to receive discharge medicines. A person-centred approach would ensure that Aboriginal and Torres Strait Islander people could access the Program designed to support their adherence to medicines, wherever and whenever they need it.



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1.4. State and territory government collaboration in HTA

Taking all Options within this section: 1.4. State and territory government collaboration in HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Development of central standardised data sharing system for utilisation and outcome data

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

- Positive
- Very positive
- Don't know

Increase opportunities for consultation and work sharing

- Very negative
- Negative
- Neutral

Health technologies that are jointly funded by the Commonwealth and state and territory governments (such as high cost, Highly Specialised Therapies (HSTs) delivered to public hospital inpatients)

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Development of central standardised data sharing system for utilisation and outcome data

SHPA is pleased with the uptake of our recommendation to develop a repository of non-PBS, off-label and Special Access Scheme (SAS) medicines data gathered from all hospitals across Australia to facilitate more timely decision making and provide Australians with early access to medicines needed in the acute care setting. As the TGA is currently undertaking parallel consultations to inform the repurposing of medicines in Australia, SHPA believes these two areas of work should work together and further achieve collaboration and breaking down of silos in our healthcare system when it comes to medicines regulation and funding.

As expressed in [SHPA's submission to the HTA Policy and Methods Review – consultation 1](#), the development of this data sharing system would be a useful resource to leverage off the experience of specialist clinicians and pharmacists, and a means of scanning the horizon for medicines commonly used in the acute care setting, to be considered for approval in Australia.

SHPA also recommends that the collection of data on the use of non-PBS medicines is across all care settings, including the use of unregistered medicines and off-label medicines, to inform future funding decisions, policies, regulations and clinical guidelines preventing future medicine-related hospital admissions.

Increase opportunities for consultation and work sharing

Once again, SHPA is pleased with this option to increase opportunities for consultation and work sharing by state and territory governments across the health technology lifecycle. However, SHPA recommends that hospitals should also be engaged and offered an opportunity to provide clinical input into PBS indications for conditions, given the extensive off-label use of medicines that is pertinent to medicines and technology regulation and funding, and has demonstrable impacts on patient access that can amount to a postcode lottery.



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Health technologies that are jointly funded by the Commonwealth and state and territory governments (such as high cost, Highly Specialised Therapies (HSTs) delivered to public hospital inpatients)

SHPA strongly advocates for a nationally cohesive, efficient, and responsive HTA framework to inform government investment and disinvestment decisions in Australia. HTAs must consider the broader implications of a health technology on the health system and fund the whole cost of therapy, not just the individual health technology, if we are to ensure person-centred and equitable access to health technologies, as outlined in the National Medicines Policy (NMP). The current lack of suitable funding pathways that provide subsidy for the whole cost of therapy results in inequity in access and creates perverse incentives, ultimately impacting on consumer health outcomes and further costing the health system.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

It is essential that seamless integration and data exchange between different systems and platforms is designed to maximise the utility and effectiveness of the shared data whilst not placing additional administrative burden on the health system.



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2.1. Streamlining and aligning HTA pathways and advisory committees

Taking all Options within this section: 2.1. Streamlining and aligning HTA pathways and advisory committees into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Pathway for drugs for ultra-rare diseases (Life Saving Drugs Program (LSDP))

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Vaccine pathway

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Expanding role of PBAC

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Unified HTA pathway for all health technologies with Commonwealth funding

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Pathway for drugs for ultra-rare diseases (Life Saving Drugs Program (LSDP))

Consolidating the HTA process under PBAC as the sole committee for drugs for ultra-rare diseases eliminates duplication and ensures a more streamlined evaluation process. Leveraging the expertise of the LSDP expert panel to inform PBAC's decisions enhances the rigor and robustness of assessments, leading to more evidence-based recommendations to the Minister.

Vaccine pathway

Once again, streamlining the pathway for listing of vaccines on the National Immunisation Program (NIP) will reduce duplication and add efficiencies to the system.

Expanding role of PBAC

By entrusting PBAC with a broader advisory role, stakeholders benefit from a centralised and expert evaluation process, reducing duplication and fragmentation across various HTA pathways. This consolidation promotes consistency, efficiency, and transparency in decision-making, streamlining the evaluation process for a wider range of health technologies.



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Furthermore, decoupling HTA recommendations through PBAC from subsequent funding decisions through the PBS enhances flexibility and responsiveness in healthcare financing. This approach allows for tailored funding mechanisms based on the specific needs and characteristics of different health technologies.

Unified HTA pathway for all health technologies with Commonwealth funding

Whilst having a unified, national, HTA pathway is a priority, SHPA continues to advocate for the development of a single-funder model for health technologies. Development of single-funder models for medicines in hospitals will reduce inequity of patient access to high-cost and complex medicines, and enable patient-centred and timely provision of treatment when and where patients require them, aligning with Australia's NMP.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Whilst there is a focus on life saving drugs, it is important to note that in some cases, medicines that can significantly improve a consumer's quality of life may be just as significant. Measures to identify and fast-track these medicines should be considered.



2.2. Proportionate appraisal pathways

Taking all Options within this section: 2.2. Proportionate appraisal pathways into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Triaging submissions

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Streamlined pathway for cost-minimisation submissions (therapies not claiming a significant improvement in health outcomes or reduction in toxicity)

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN:

Alternative option 1: Introducing an optional resolution step before HTA committee consideration

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Alternative option 2: Introducing an optional resolution step before HTA committee consideration, with additional post committee resolution

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Expanding resolution step to all relevant cost effectiveness submissions

- Very negative
- Negative
- Neutral
- Positive

Alternative option 3: Early price negotiation

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Alternative option 4: Introducing an optional resolution step after HTA committee consideration but before advice is finalised

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

- Very positive
- Don't know

Development of a disease specific common model (reference case) for disease areas with high active product development

- Very negative



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- Negative
- Neutral
- Positive
- Very positive
- Don't know

Decouple the requirement for the TGA Delegate's overview to support PBAC advice

- Very negative
- Negative
- Neutral

- Positive
- Very positive
- Don't know

Case manager

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Triaging submissions

The implementation of a triaging process streamlines health technology funding and assessment pathways, facilitating more efficient allocation of resources and ensuring that submissions are evaluated using fit-for-purpose appraisal mechanisms.

Streamlined pathway for cost-minimisation submissions (therapies not claiming a significant improvement in health outcomes or reduction in toxicity)

SHPA is concerned that this cost-minimisation approach will, fundamentally, reduce access to a range of medicines and limit both consumer and health professional choice of the most appropriate therapy. Australians currently have access to a range of therapies from the same class which is important as not everyone responds to every medicine in the same way. This is not something that requires reform.

Australia's pharmaceutical market is less than 2% globally but remains a competitive market that should be maintained. With inappropriate measures, such as mandating cost-minimisation, sponsors may prioritise markets with more favourable pricing and reimbursement conditions. If sponsors perceive Australia's HTA process as unfavourable or uncertain, they may choose to focus their efforts on markets where they anticipate higher returns on investment. This will ultimately leave Australians with less choice of therapy.

Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN: [Alternative option 1: Introducing an optional resolution step before HTA committee consideration](#)

N/A

[Alternative option 2: Introducing an optional resolution step before HTA committee consideration, with additional post committee resolution](#)

N/A

[Alternative option 3: Early Price negotiation](#)

N/A

[Alternative option 4: Introducing an optional resolution step after HTA committee consideration but before advice is finalised](#)

N/A

Expanding resolution step to all relevant cost effectiveness submissions

N/A

Development of a disease specific common model (reference case) for disease areas with high active product development

N/A

Decouple the requirement for the TGA Delegate's overview to support PBAC advice

Enabling the PBAC to communicate its likely advice to sponsors before receiving the TGA delegate's overview, promotes efficiency and transparency in the funding and assessment pathways.

Case manager



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N/A

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

No.

Under the subject “Early resolution mechanisms for submissions of major new therapeutic advances in areas of HUCN”, there are some options that provide different alternative mechanisms to address the issues that relate to them.

To what extent could the below different alternative options (if implemented) address the issues that relate to them?

Alternative option 1: Introducing an optional resolution step before HTA committee consideration

- To a significant extent
- To a moderate extent
- To a limited extent
- Not at all
- Don't know

Alternative option 2: Introducing an optional resolution step **before** HTA committee consideration, with additional post committee resolution

- To a significant extent
- To a moderate extent
- To a limited extent
- Not at all
- Don't know

Alternative option 3: Early Price negotiation

- To a significant extent
- To a moderate extent
- To a limited extent
- Not at all
- Don't know

Alternative option 4: Introducing an optional resolution step **after** HTA committee consideration but **before** advice is finalised

- To a significant extent
- To a moderate extent
- To a limited extent
- Not at all
- Don't know

What comments do you have about the relative strengths and weaknesses of these alternative potential reform options?

N/A

Which of the proposed reform options do you think offers greatest scope to improve the HTA assessment process?

- Alternative option 1: Introducing an optional resolution step before HTA committee consideration
- Alternative option 2: Introducing an optional resolution step before HTA committee consideration, with additional post committee resolution
- Alternative option 3: Early Price negotiation
- Alternative option 4: Introducing an optional resolution step after HTA committee consideration but before advice is finalised
- None of these

Why did you select that response above?

Not within scope of our response.



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3.1. Determination of the Population, Intervention, Comparator, Outcome

Taking all Options within this section: 3.1. Determination of the Population, Intervention, Comparator, Outcome into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Increased early stakeholder input

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

- Positive
- Very positive
- Don't know

Updated guidance

Increased transparency for stakeholders

- Very negative
- Negative
- Neutral

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Increased early stakeholder input

By incorporating early stakeholder input into the determination of the PICO, HTA evaluations become more patient-centred, and clinically relevant, reflective of the diverse needs and perspectives of the patient populations they aim to serve.

Increased transparency for stakeholders

This approach enhances transparency by providing accessible information to patients and caregivers, empowering them to make more informed decisions about their healthcare. Clear communication of the PICO criteria helps patients and caregivers understand the scope of the treatment and manage their expectations regarding potential outcomes.

Updated guidance

Updating guidance to consider equity and priority populations and providing additional guidance on PICO development strengthens the patient-centeredness and relevance of HTA evaluations.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

No.



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3.2. Clinical Evaluation Methods

Taking all Options within this section: 3.2. Clinical Evaluation Methods into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Overarching principles for adopting methods in Australian HTA

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Methods for the assessment of nonrandomised and observational evidence

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Methods for the assessment of surrogate endpoints

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Generate a curated list of methodologies that are preferred by decision-makers, in collaboration with evaluation groups and sponsors

- Very negative
- Negative

- Neutral
- Positive
- Very positive
- Don't know

Develop an explicit qualitative value framework

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Therapies that target biomarkers (e.g. tumour agnostic cancer therapies, therapies that target particular gene alterations)

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Pharmacogenomic technologies

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Overarching principles for adopting methods in Australian HTA

This approach ensures consistency, transparency, and rigor in the assessment process, ultimately enhancing the reliability and credibility of HTA findings. By adhering to these principles, decision-makers can make informed choices based on robust evidence, leading to more effective allocation of healthcare resources and improved patient outcomes.



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Methods for the assessment of nonrandomised and observational evidence

N/A

Methods for the assessment of surrogate endpoints

N/A

Generate a curated list of methodologies that are preferred by decision-makers, in collaboration with evaluation groups and sponsors

This initiative ensures that decision-makers and sponsors have access to standardised information and resources, facilitating a more informed and efficient evaluation process. Additionally, providing training and feedback mechanisms further supports the adoption and effective utilisation of these methodologies, ultimately improving the quality and reliability of HTA assessments.

Develop an explicit qualitative value framework

SHPA is very supportive of the need to develop an explicit qualitative value framework in consultation with stakeholders. SHPA believes that 'value' should recognise the clinical, social, and financial value of approving or subsidising a health technology to enable access to patients requiring it, compared to not approving or subsidising it i.e., what are the implications of disease progression on a range of factors including, mental health, family life, loss of work, and hospitalisation.

Therapies that target biomarkers (e.g. tumour agnostic cancer therapies, therapies that target particular gene alterations)

By providing clear guidance on how to compile and consider evidence, these guidelines will enhance consistency and transparency in decision-making. Co-designing a Statement of Principles with input from various stakeholders, including patients, clinicians, and the broader public, ensures that ethical and societal considerations are integrated into the evaluation process.

Pharmacogenomic technologies

By providing clear guidance on how evidence should be compiled and considered, these guidelines will enhance consistency and transparency in decision-making regarding pharmacogenomic technologies.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

No.



3.3. Economic evaluation

Taking all Options within this section: 3.3. Economic evaluation into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Selection of the comparator

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

- Positive
- Very positive
- Don't know

Valuing overall

Valuing of long-term benefits

- Very negative
- Negative
- Neutral

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Selection of the comparator

By establishing transparent criteria, stakeholders can ensure consistency and fairness in the selection process, thereby enhancing the credibility and reliability of economic evaluations. Additionally, the consideration of alternative methods based on the level of risk and clinical need allows for a more nuanced evaluation that aligns with the specific characteristics of each submission.

Valuing of long-term benefits

By developing modelling to assess the aggregate impact of potential changes to the discount rate, decision-makers can better understand the implications on budgetary considerations and opportunity costs. However, careful consideration is needed to ensure that any adjustments to the discount rate align with broader policy goals and do not inadvertently affect the affordability or accessibility of healthcare interventions.

Valuing overall

By engaging stakeholders and considering various factors such as the magnitude of benefit, confidence in achieving that benefit, and potential measures to offset higher costs, HTA committees can make more informed decisions. Ensuring representation from a diverse range of stakeholders and utilising a qualitative value framework can help capture a broad spectrum of perspectives and mitigate biases in decision-making.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

No.



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4.1. Approaches to funding or purchasing new health technologies

Taking all Options within this section: 4.1. Approaches to funding or purchasing new health technologies into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Recognising competition between new health technologies that deliver similar outcomes:

Alternative option 1: In conjunction with options for proportionate assessment of cost-minimisation submissions, **require offers** of a lower price for health technologies that provide no added benefit

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Investigate further options to address budget impact implications of high-cost/high-impact health technologies

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Pricing offer (PO) and negotiation guidance framework

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Post-listing re-assessment of health technologies

- Very negative
- Negative
- Neutral

Alternative option 2: In conjunction with options for proportionate assessment of cost-minimisation submissions, **incentivise offers** of a lower price for health technologies that provide no added benefit

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know
- Positive
- Very positive
- Don't know

Approaches for managing uncertainty - bridging funding coverage for earlier access to therapies of likely HATV and HUCN

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Approaches for managing uncertainty - revised guidance on the uses of different managed entry tools

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Recognising competition between new health technologies that deliver similar outcomes:



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Alternative option 1: In conjunction with options for proportionate assessment of cost-minimisation submissions, **require offers** of a lower price for health technologies that provide no added benefit

As discussed in response to Topic 2.2, SHPA is concerned that this cost-minimisation approach will, fundamentally, reduce access to a range of medicines and limit both consumer and health professional choice of the most appropriate therapy. Australians currently have access to a range of therapies from the same class which is important as not everyone responds to every medicine in the same way. This is not something that requires reform.

Alternative option 2: In conjunction with options for proportionate assessment of cost-minimisation submissions, **incentivise offers** of a lower price for health technologies that provide no added benefit

It is unclear what would be considered means of incentivising offers of a lower price for health technologies. As stated above, proposed options need to ensure they will not disincentivise sponsors from bringing their therapies to Australia.

Investigate further options to address budget impact implications of high-cost/high-impact health technologies

Introducing alternate contract funding/financing tools and instruments may add complexity to the funding landscape, requiring stakeholders to navigate unfamiliar mechanisms and processes. This complexity could potentially delay access to new technologies or increase administrative burden for healthcare providers and payers.

Pricing offer (PO) and negotiation guidance framework

N/A

Post-listing re-assessment of health technologies

By periodically reviewing health technologies after their initial evaluation, this program enables timely updates to funding or purchasing decisions based on evolving evidence and changing clinical needs. Additionally, the incorporation of an explicit disinvestment framework ensures that resources are allocated efficiently, redirecting funding from technologies that no longer provide significant value to those that offer greater benefit.

Approaches for managing uncertainty - bridging funding coverage for earlier access to therapies of likely HATV and HUCN

By creating a separate funding program or enabling conditional listings on the PBS, this option allows for expedited access to therapies that demonstrate significant potential but require further evaluation.

Approaches for managing uncertainty - revised guidance on the uses of different managed entry tools

By encouraging creative propositions and utilisation of managed entry arrangements, this option promotes collaborative engagement between sponsors and decision-makers to address uncertainty constructively.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

While offering more options for sponsors and decision-makers to manage uncertainty, an overly complex system could lead to confusion or inefficiencies. It is essential to carefully balance the need for flexibility with the need for clarity and efficiency in the HTA process to avoid unintended consequences such as delays in patient access or increased administrative burden. Close consultation with stakeholders and thorough impact assessments can help mitigate these concerns and ensure that any revisions to managed entry guidance achieve their intended goals effectively.

Under the subject “Recognising competition between new health technologies that deliver similar outcomes”, there are two options that provide different alternative mechanisms to address the issues that relate to them.

To what extent could the below different alternative options (if implemented) address the issues that relate to them?

Alternative option 1: In conjunction with options for proportionate assessment of cost-minimisation submissions, **require offers** of a lower price for health technologies that provide no added benefit

- To a significant extent
- To a moderate extent
- To a limited extent

- Not at all
- Don't know

Alternative option 2: In conjunction with options for proportionate assessment of cost-minimisation submissions, **incentivise offers** of a lower price for health technologies that provide no added benefit



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- To a significant extent
- To a moderate extent
- To a limited extent

- Not at all
- Don't know

What comments do you have about the relative strengths and weaknesses of these alternative potential reform options?

Nil.

Which of the proposed reform options do you think offers greatest scope to address the issues identified in consultation to date?

- Alternative option 1: In conjunction with options for proportionate assessment of cost-minimisation submissions, **require offers** of a lower price for health technologies that provide no added benefit
- Alternative option 2: In conjunction with options for proportionate assessment of cost-minimisation submissions, **incentivise offers** of a lower price for health technologies that provide no added benefit
- None of these

Why did you select that response above?

N/A



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4.2. Approaches to incentivise development of products that address antimicrobial resistance (AMR)

Taking all Options within this section: 4.2. Approaches to incentivise development of products that address antimicrobial resistance (AMR) into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

HTA Fee exemptions for products that address AMR

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

- Positive
- Very positive
- Don't know

Funding and reimbursement-related changes to support availability of antimicrobials

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

HTA Policy and Guidance changes for products that address AMR

- Very negative
- Negative
- Neutral

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

HTA Fee exemptions for products that address AMR

This approach recognises the critical importance of addressing AMR as a global public health priority and acknowledges the unique challenges associated with developing antimicrobial therapies. By exempting HTA fees, this option encourages investment in research and development of new antimicrobial products, fostering innovation in this crucial area of healthcare.

HTA Policy and Guidance changes for products that address AMR

This option promotes a proactive and collaborative approach to addressing AMR through HTA policy and guidance changes. By aligning evaluation methods with the unique challenges posed by AMR, this approach incentivises the development and market availability of antimicrobial products, ultimately contributing to efforts to combat antimicrobial resistance and safeguard public health.

Funding and reimbursement-related changes to support availability of antimicrobials

This option fosters innovation and investment in antimicrobial research and development by exploring alternative funding and reimbursement mechanisms.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

No.



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4.3. Understanding the performance of health technologies in practice

Taking all Options within this section: 4.3. Understanding the performance of health technologies in practice into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Oversight – reforms to optimise access to and use of Real World Data (RWD) in HTA

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Develop a strategic approach to increase confidence, awareness, and acceptance of cross-jurisdictional and cross-sectoral RWD access and use in HTA

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Data infrastructure

- Very negative
- Negative
- Neutral
- Positive
- Very positive

- Don't know

Methods development

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Develop Guidance framework

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Collection of utilisation and outcome data for provisionally listed health technologies

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Oversight – reforms to optimise access to and use of RWD in HTA

Establishing a multi-stakeholder advisory group to optimise access and use of RWD in HTA represents a strategic initiative to strengthen evidence-based decision-making and support continuous improvement in healthcare delivery. By bringing together diverse stakeholders, including healthcare professionals, researchers, policymakers, and patient representatives, this approach ensures that RWD is leveraged effectively to inform HTA evaluations.

Develop a strategic approach to increase confidence, awareness, and acceptance of cross-jurisdictional and cross-sectoral RWD access and use in HTA

Developing a strategic approach to increase confidence, awareness, and acceptance of cross-jurisdictional and cross-sectoral RWD access and use in HTA supports evidence-based decision-making and strengthens the integrity of HTA



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evaluations. By engaging stakeholders, leveraging international expertise, and prioritising data privacy and security, Australia can optimise the use of RWD to enhance understanding of health technology performance and improve healthcare outcomes.

Data infrastructure

Developing a robust data infrastructure for RWE in HTA improves the understanding of health technology performance and supports evidence-based decision-making.

Methods development

Developing a coordinated approach to evidence development using best-practice methods for HTA improves the quality and relevance of evidence used in decision-making processes.

Develop Guidance framework

Developing a guidance framework for the use of RWD and RWE enhances the reliability, validity, and relevance of evidence used in HTA evaluations.

Collection of utilisation and outcome data for provisionally listed health technologies

The collection of utilisation and outcome data through existing registries supports evidence-based decision-making and strengthens the HTA process by providing timely and comprehensive insights into health technology performance in real-world settings.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Whilst the collection and utilisation of RWD is of great importance, it is necessary to validate the quality and reliability of the data. Depending on the source of the data, there may be concerns regarding its quality, completeness, and accuracy.

In addition, the applicability of findings from data collected through registries or linkages may be limited to specific populations or settings, potentially affecting the generalisability of HTA conclusions. Careful consideration of population characteristics and context is necessary when interpreting and applying the results.



5.1. Proactively addressing areas of unmet clinical need and gaps in the PBS

Taking all Options within this section: 5.1. Proactively addressing areas of unmet clinical need and gaps in the PBS into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Development of a priority list

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Identifying therapies to meet priority list (horizon scanning)

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Early assessment and prioritisation of potentially promising therapies

- Very negative
- Negative

- Neutral
- Positive
- Very positive
- Don't know

Proactive submission invitation and incentivisation

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Early PICO scoping

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Development of a priority list

The development of a priority list for HUCN, informed by diverse stakeholders and inclusive of specific considerations for Indigenous health and public health surveillance, strengthens the HTA process and ensures that healthcare resources are directed toward areas of greatest need.

Identifying therapies to meet priority list (horizon scanning)

By systematically scanning for new therapies or new indications for existing therapies, this approach ensures that emerging healthcare innovations are promptly evaluated and considered for funding.

Partnering with ACCHSs to ensure the inclusion of First Nations peoples' health outcomes and health equity in the horizon scanning process is essential for addressing disparities in healthcare access and outcomes. This partnership approach recognises the importance of Indigenous perspectives and priorities in identifying therapies to meet the needs of diverse patient populations.



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Furthermore, including technologies without market authorisation in Australia and exploring opportunities for repurposing existing therapies for new indications broadens the scope of the horizon scanning process. This comprehensive approach maximises the potential to identify innovative solutions and address gaps in funded access across various healthcare settings.

Early assessment and prioritisation of potentially promising therapies

By engaging in early assessment and prioritisation, healthcare decision-makers can make informed choices about which therapies to prioritise for further evaluation and potential funding. This systematic approach enhances the effectiveness of the HTA process by focusing attention and resources on therapies that have the most significant impact on addressing unmet clinical needs and improving patient care.

Proactive submission invitation and incentivisation

By proactively inviting sponsors to submit therapies identified through horizon scanning, the government can accelerate the evaluation and potential funding of innovative treatments.

Offering incentives such as fee waivers, case management, priority pathways, and potential access to provisional funding programs encourages sponsors to bring submissions forward in a timely manner. These incentives reduce barriers for sponsors and streamline the submission process, facilitating quicker access to new therapies for patients in need.

Early PICO scoping

Early PICO scoping enhances the efficiency and effectiveness of the HTA process by ensuring that key evaluation parameters are identified and addressed early on.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Early PICO scoping relies on the availability of high-quality data and evidence. In some cases, there may be limitations in the availability or reliability of data, which could impact the accuracy and robustness of early assessments and prioritisation efforts.



5.2. Establishment of horizon scanning programs to address specific informational needs within HTA and the health system

Taking all Options within this section: 5.2. Establishment of horizon scanning programs to address specific informational needs within HTA and the health system into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Horizon scanning for advanced therapies (including high cost, HSTs funded through the NHRA) and other potentially disruptive technologies

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

Horizon Scanning to meet priority areas (including addressing equity and HUCN)

- Very negative
- Negative

- Neutral
- Positive
- Very positive
- Don't know

Horizon Scanning to help operational and capacity planning for HTA and health systems

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Horizon scanning for advanced therapies (including high cost, HSTs funded through the NHRA) and other potentially disruptive technologies

By involving all jurisdictions and relevant stakeholders, including healthcare agencies and industry, this approach ensures comprehensive coverage and collaboration.

Horizon Scanning to meet priority areas (including addressing equity and HUCN)

Involving patient and clinician communities in the identification process ensures diverse perspectives are considered, enhancing the relevance and effectiveness of the scanning efforts.

Horizon Scanning to help operational and capacity planning for HTA and health systems

By identifying major therapeutic advances and trends, this option facilitates proactive planning for regulatory and reimbursement systems and enables anticipation of potential disruptions in treatment paradigms. Collaboration with industry ensures a comprehensive approach to horizon scanning, exploring alternative mechanisms if necessary to enhance effectiveness. This proactive approach supports efficient resource allocation and system preparedness, ultimately improving decision-making and healthcare delivery in the HTA process.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.



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Ensuring the long-term sustainability of horizon scanning initiatives requires ongoing commitment from all stakeholders, as well as mechanisms for continuous improvement and adaptation to evolving healthcare landscapes. Without sustained support and investment, the effectiveness of horizon scanning efforts may diminish over time.



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5.3. Consideration of environmental impacts in the HTA

Taking all Options within this section: 5.3. Consideration of environmental impacts in the HTA into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Environmental impact reporting

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Environmental impact reporting

By investigating the feasibility of reporting embodied greenhouse gas emissions and other environmental impacts, HTA bodies can contribute to broader efforts to mitigate climate change and promote sustainability in healthcare.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

It is important to ensure that the prioritisation of environmental considerations in HTA decisions does not negatively impact on health outcomes. For example, a technology with lower environmental impact may not necessarily be the most clinically effective or cost-effective option. Balancing these competing priorities requires careful consideration and stakeholder engagement.



5.4. Mechanisms for continuous review and improvement

Taking all Options within this section: 5.4. Mechanisms for continuous review and improvement into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

A program of continuous review and improvement for current HTA policies and methods

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

A program of continuous review and improvement for current HTA policies and methods

By systematically evaluating and updating HTA practices, this program can enhance decision-making, promote transparency, and accommodate advancements in technology and methodologies.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Striking the right balance between stability and adaptability is crucial. While regular updates are necessary to reflect evolving evidence and best practices, frequent changes could lead to uncertainty and instability within the HTA process.



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5.5. Capacity and capability of the HTA system

Taking all Options within this section: 5.5. Capacity and capability of the HTA system into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

Nil.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Improve HTA capacity and workforce in Australia

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Improve HTA capacity and workforce in Australia

Nil.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

Nil.



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5.6. Strengthen international partnerships and work-sharing

Taking all Options within this section: 5.6. Strengthen international partnerships and work-sharing into account.

Overall, to what extent could the options (if implemented) address the issues that relate to them?

- Completely address the issue(s)
- Mostly address the issue(s)
- Address some but not most of the issue(s)
- Address little or none of the issue(s)
- Don't know

If you would like to expand on your answer above you can do so below:

No.

If implemented, overall would these Options have a positive or negative impact on you (/your organisation)?

Harmonisation of HTA evaluations

- Very negative
- Negative
- Neutral
- Positive
- Very positive
- Don't know

- Positive
- Very positive
- Don't know

Collaboration with international jurisdictions to deliver sustainable access to health technologies

- Very negative
- Negative
- Neutral

Work sharing for individual submissions

- Very negative
- Negative
- Neutral

- Positive
- Very positive
- Don't know

If you would like to expand on any of your answers above relating to a specific Option, you can do so below:

Harmonisation of HTA evaluations

By aligning evaluation methodologies and facilitating early dialogue with stakeholders, including industry sponsors, clinicians, patients, and regulatory entities, jurisdictions can streamline processes, reduce duplication, and promote consistency in decision-making. This approach not only enhances efficiency but also fosters collaboration, knowledge exchange, and mutual learning among participating jurisdictions, ultimately leading to more robust and evidence-based HTA outcomes.

Work sharing for individual submissions

By piloting initiatives such as the "Work Sharing Initiative" pathway and the "Comparable Overseas Agency" pathway, jurisdictions can leverage each other's expertise and resources to streamline evaluation processes and enhance efficiency in decision-making.

Collaboration with international jurisdictions to deliver sustainable access to health technologies

By forming partnerships with other countries, jurisdictions can negotiate favourable pricing agreements with manufacturers, enhance economies of scale, and improve affordability and accessibility of essential health technologies. This collaboration fosters knowledge-exchange, promotes best practices in health technology assessment, and facilitates the adoption of innovative solutions to address shared healthcare challenges.

Do you have further comments or concerns to add specific to this topic that should be considered? For example, here you can detail any unintended consequences or overlooked considerations if applicable.

No.



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Summary: All options overall

In summary, considering all the draft reform options together:

How confident are you that the reform options (if implemented) will make health technology assessments better overall?

- Very confident
- Somewhat confident
- Not very confident
- Not at all confident
- Don't know

If you would like to expand on your answer above you can do so below:

No.

Finally, do you have any further comments about the draft Options Paper or consultation you would like to make before submitting your feedback?

The Society of Hospital Pharmacists of Australia (SHPA) is the national, professional organisation for the 6,100+ Hospital Pharmacists, and their Hospital Pharmacist Intern and Hospital Pharmacy Technician colleagues working across Australia's health system, advocating for their pivotal role improving the safety and quality of medicines use. Embedded in multidisciplinary medical teams and equipped with exceptional medicines management expertise, SHPA members are progressive advocates for clinical excellence, committed to evidence-based practice and passionate about patient care.



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