

I Jornada de Enfermedades Raras y Medicamentos Huérfanos

# La evaluación de Medicamentos Huérfanos y su inclusión en la GFT

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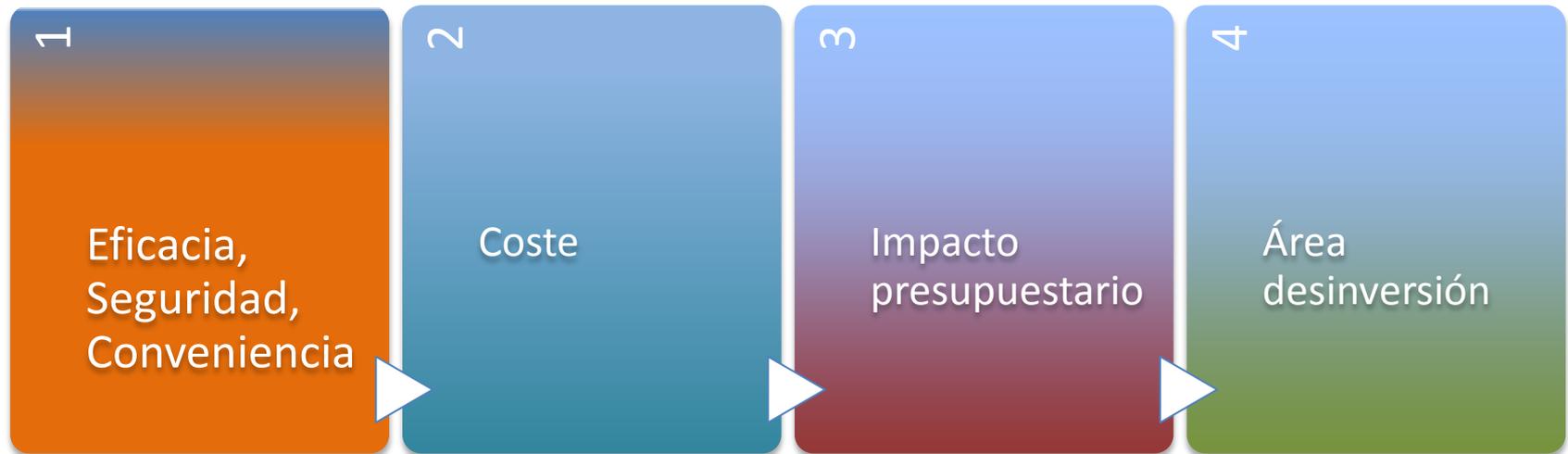
Valencia, Viernes 12 Abril 2013

# Evaluación de Medicamentos



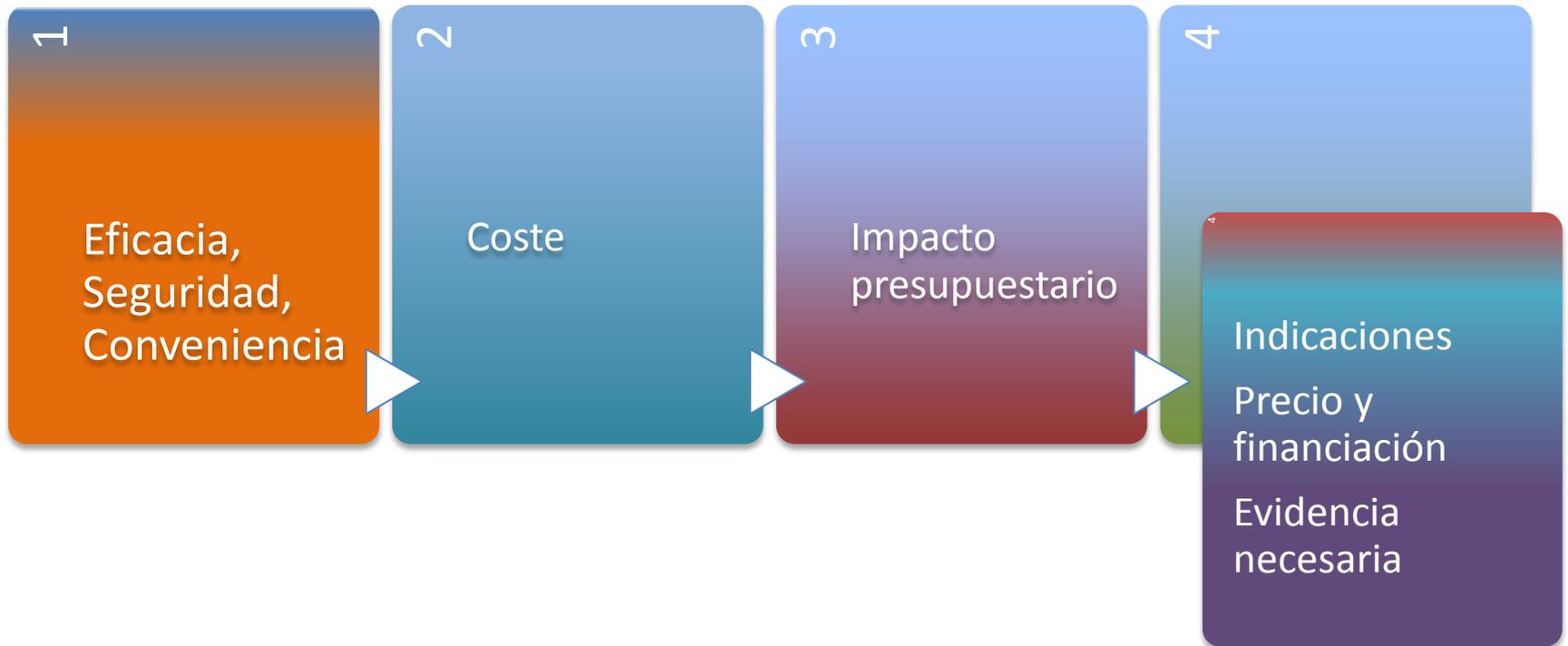
# Secuencia del análisis

## nuevos aspectos a considerar



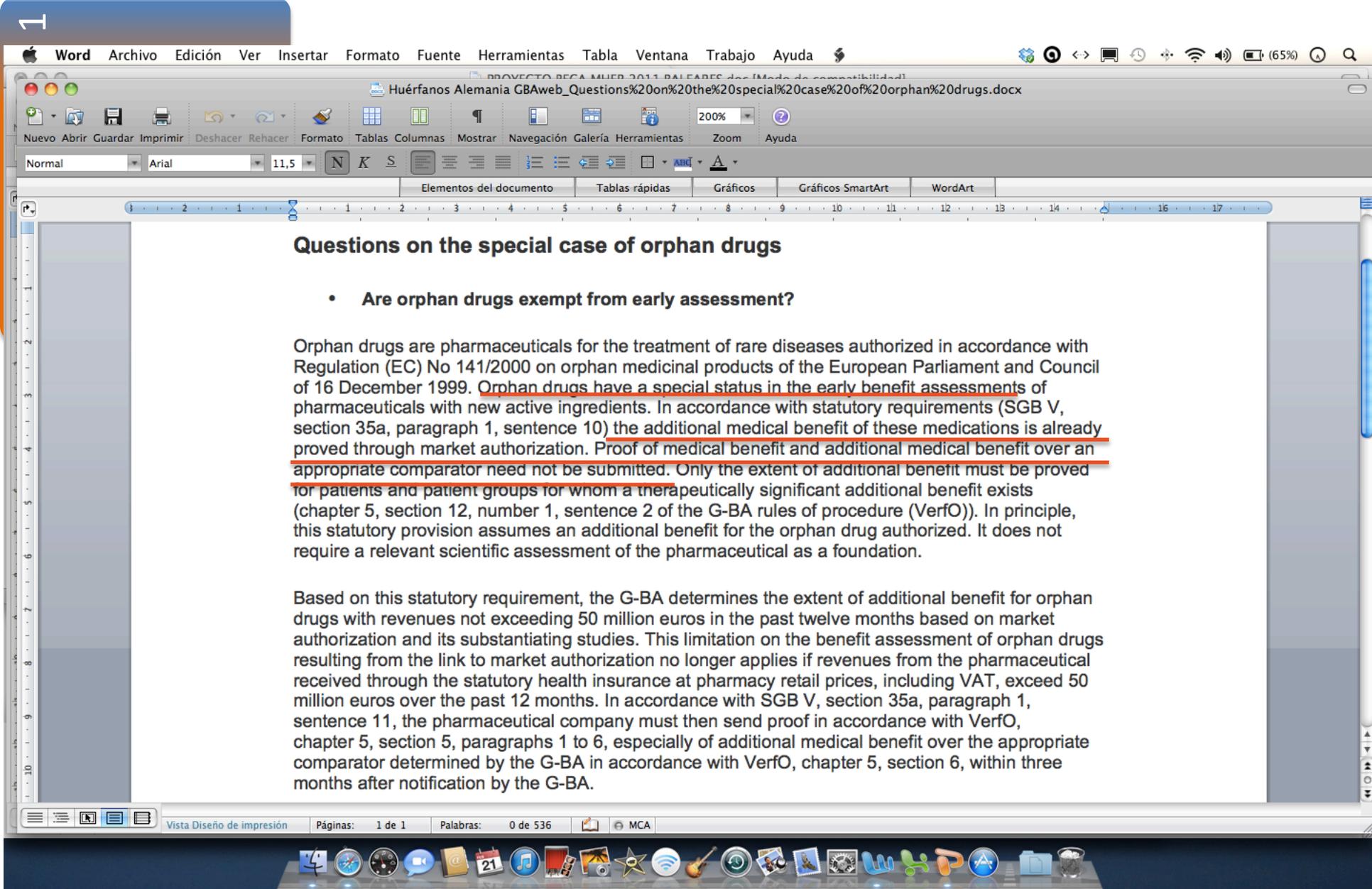
# Secuencia del análisis

## nuevos aspectos a considerar



Eficacia,  
Seguridad,  
Conveniencia

- Evidencia de eficacia limitada
- 40% “bajo condiciones excepcionales”: el solicitante no presentaba suficiente evidencia de seguridad y eficacia
- 5% “aprobación condicional”
  - Pocos pacientes
  - Escaso seguimiento
  - Variables sustitutivas



## Questions on the special case of orphan drugs

- **Are orphan drugs exempt from early assessment?**

Orphan drugs are pharmaceuticals for the treatment of rare diseases authorized in accordance with Regulation (EC) No 141/2000 on orphan medicinal products of the European Parliament and Council of 16 December 1999. Orphan drugs have a special status in the early benefit assessments of pharmaceuticals with new active ingredients. In accordance with statutory requirements (SGB V, section 35a, paragraph 1, sentence 10) the additional medical benefit of these medications is already proved through market authorization. Proof of medical benefit and additional medical benefit over an appropriate comparator need not be submitted. Only the extent of additional benefit must be proved for patients and patient groups for whom a therapeutically significant additional benefit exists (chapter 5, section 12, number 1, sentence 2 of the G-BA rules of procedure (VerFO)). In principle, this statutory provision assumes an additional benefit for the orphan drug authorized. It does not require a relevant scientific assessment of the pharmaceutical as a foundation.

Based on this statutory requirement, the G-BA determines the extent of additional benefit for orphan drugs with revenues not exceeding 50 million euros in the past twelve months based on market authorization and its substantiating studies. This limitation on the benefit assessment of orphan drugs resulting from the link to market authorization no longer applies if revenues from the pharmaceutical received through the statutory health insurance at pharmacy retail prices, including VAT, exceed 50 million euros over the past 12 months. In accordance with SGB V, section 35a, paragraph 1, sentence 11, the pharmaceutical company must then send proof in accordance with VerFO, chapter 5, section 5, paragraphs 1 to 6, especially of additional medical benefit over the appropriate comparator determined by the G-BA in accordance with VerFO, chapter 5, section 6, within three months after notification by the G-BA.

# Medicamento Huérfano

## Prevalencia/incidencia

- se destine a establecer un diagnóstico, prevenir o tratar una enfermedad que no afecte a más de cinco personas por cada diez mil en la Comunidad

## Económico

- se destine al tratamiento de una enfermedad grave o incapacitante, cuando sea improbable que, sin incentivos, la comercialización de dicho medicamento genere suficientes beneficios para justificar la inversión necesaria.

# Precio

La investigación en MH es más cara, pero en algunos casos se ha tenido de datos históricos

- 3,4-diaminopyridine: para el síndrome de Lambert-Eaton

Un medicamento no huérfano consigue una indicación huérfana.

- Sildenafil: *Viagra* disfunción eréctil; *Revatio* HPP
- Ibuprofeno: AINE y para cierre Ductus Arteriosis

Enfermedad rara	Huérfano N=28	No huérfano N=16	p
Precio DDD Bélgica 2010	138,56€ ±483,06€	16,55€ ±28,67€	<0,05

# Monopolio

- Exclusividad en el mercado (incentivo para establecer el máximo precio que se pueda soportar)
- Poca capacidad de negociación
- Presión mediática de colectivos de pacientes
- Muchos son biológicos y será difícil establecer la biosimilitud.

# Coste efectividad

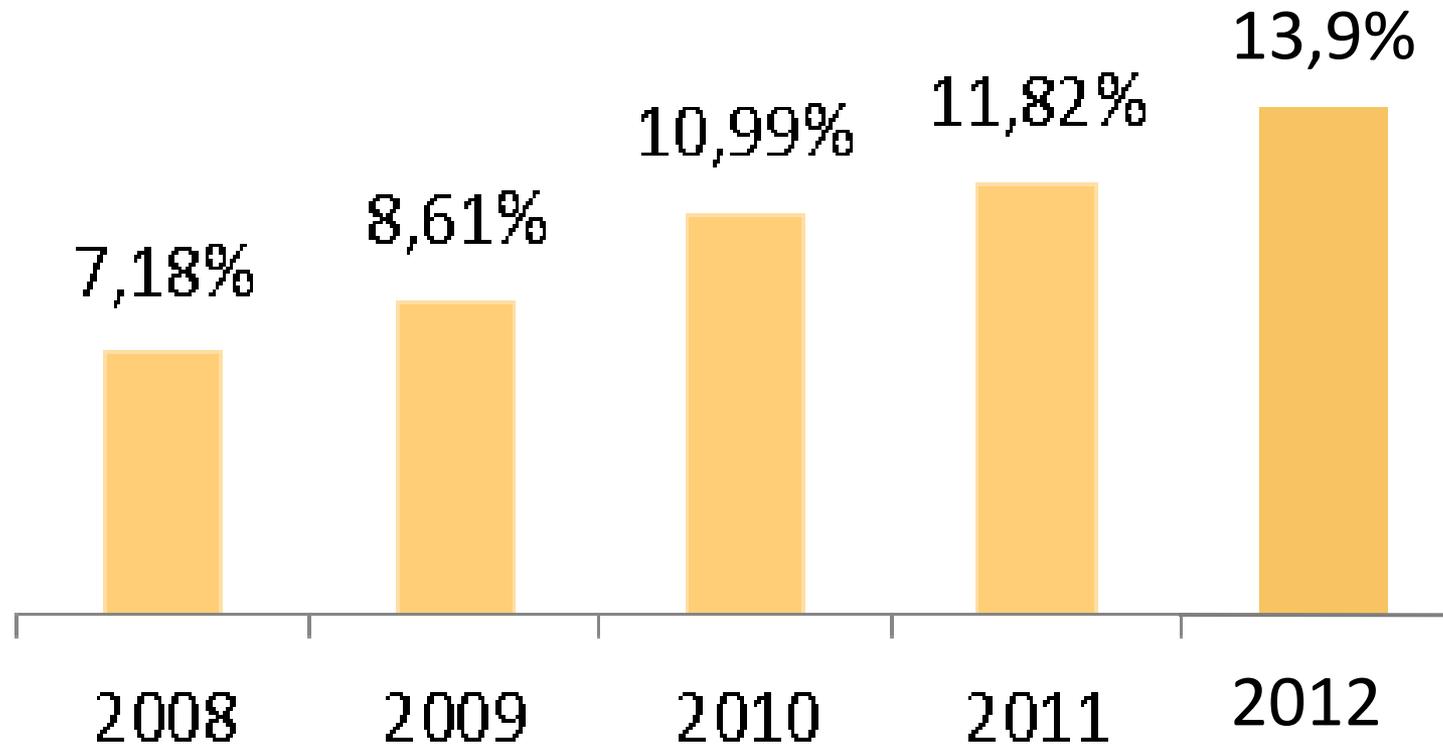
- La evaluación económica muestra que no es coste-efectivo porque el coste incremental del valor añadido es muy alto.
- No se ajustan al umbral de coste-efectividad de 20.000-30.000€/QALY utilizado NICE en Inglaterra y Gales.

# Prevalencia

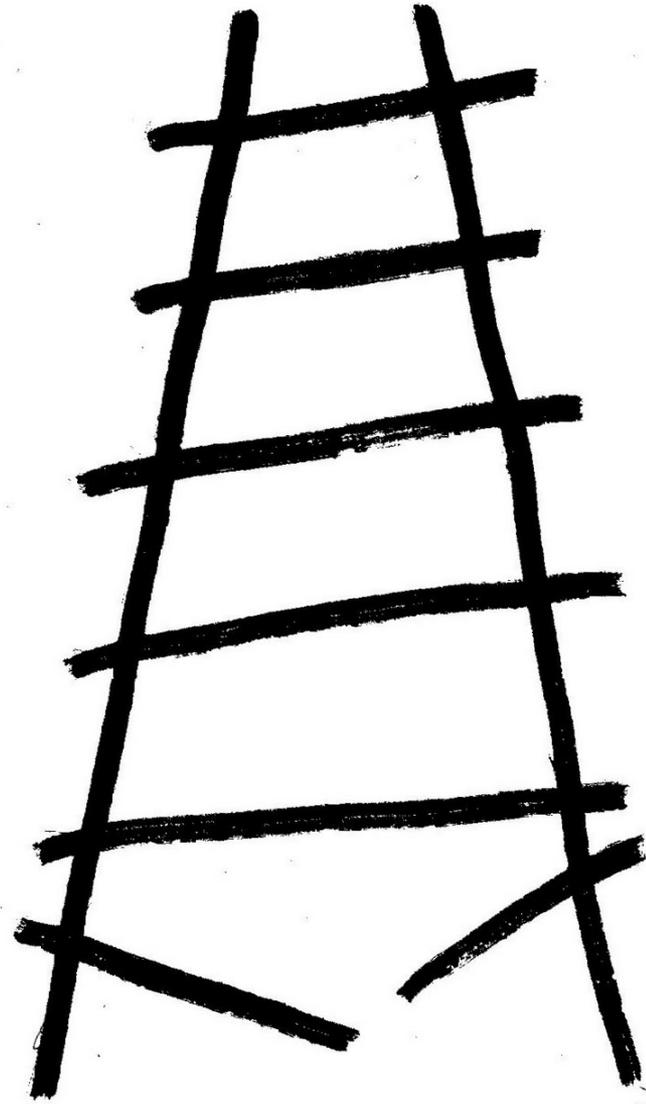
- No siempre es para pocos pacientes.
- Fragmentación enfermedad
- Varias indicaciones huérfanas,
  - Sorafenib (EMA): carcinoma hepatocelular y carcinoma renal
  - Imatinib: 6 indicaciones huérfanas en UE
- MH pasa a indicación no huérfana (Bosentan para HPP y se usa en IC)
- Medicamento común pasa a MH: sildenafil de disfunción eréctil a HPP e Hipertensión tromboembolismo pulmonar crónico
- Una enf rara en un país y no en otro (enf. tropicales, nefropatía de los Balcanes, enfermedad Andrade Baleares).
- Enfermedad raras, pero afectan a 30M de europeos.

To date, orphan drugs have only accounted for a small percentage of the overall drug budget – for example, they were estimated to account for just 1.9% of pharmaceutical expenditure in Belgium in 2008 [10], rising to around 2% in 2009 [11]; in France and the Netherlands, the 2004 figure was put at 0.7% and 1% of national drug budgets, respectively [12]. Other sources [13] found that in 2007, orphan drugs accounted for 1.7% of the French drug budget, 2.1% in Germany, 1.0% in the UK, 1.5% in Italy and 2.0% in Spain. The average overall impact in these five countries with the highest drug expenditure in Europe is just 1.7% [13]. At this level, the conclusion was that financing orphan drugs appears to be acceptable to governments, when coupled with the societal choice to treat patients with rare diseases. Another study has concluded that the share of the total pharmaceutical market represented by orphan drugs is predicted to increase from 3.3% in 2010 to a peak of 4.6% in 2016 after which it is expected to level off through 2020, as growth falls into line with that in the wider pharmaceutical market. Therefore, fears that growth in orphan drug expenditure will lead to unsustainable cost escalation may not be justified [14].

# Evolución del gasto en MH en Hospital



Med huérfanos Baleares 2011	€	%	% acum
LENALIDOMIDA / Revlimid	2.890.799	21%	21%
IMATINIB /Glivec	2.571.999	19%	40%
BOSENTAN /Tacleer	1.500.808	11%	51%
AZATIDINA/ Vidaza	723.517	5%	56%
ALGLUCOSIDASA /Myozyme	653.072	5%	61%
TRABECTEDINA /Yondelis	637.334	5%	65%
SORAFENIB /Nexavar	515.232	4%	69%
LARONIDASA /Aldurazyme	510.742	4%	73%
IDURSULFSE / Elaprase	463.704	3%	76%
DASATINIB/ Sprycel	433.469	3%	79%
ECULIZUMAB / Soliris	333.216	2%	82%
NILOTINIB/Tasigna	283.458	2%	84%
CLORAFABINA /Evoltra	254.740	2%	86%
ILOPROST /Ventavis	240.206	2%	87%
LEVODOPA-CARBIDOPA/Duodopa	236.822	2%	89%
AGALSIDASA/ Replagal	227.141	2%	91%
GALSULFASA/ Naglazyme	221.021	2%	92%
Otros	1.036.665	8%	100%
Total	13.733.945		



¿cómo se integran estos intereses: debilidad de eficacia clínica, escaso beneficio clínico, ausencia de alternativa y alto coste?

# Otros valores sociales

- Enfermedades graves sin alternativas

Medicamentos en situaciones terminales

- Principio solidaridad (soporte grupos vulnerables)

Medicamentos huérfanos

# Criterios para situaciones terminales “End-of-life” (EoL)

El NICE acepta un umbral superior al resto de tecnologías (enero 2009):

**40.000-50.000£\***

(50.000-62.000 €)

## Criterios EoL:

- Esperanza de vida de los pacientes a tratar < 24 meses.
- Aumento de la supervivencia > 3 meses.
- Inexistencia de tratamientos alternativos.
- Grupo de pacientes a tratar reducido (< 7.000 pacientes/año).

\*Financiación específica del NHS: fondo complementario de 200 millones de £ anuales *Cancer Drugs Fund*.



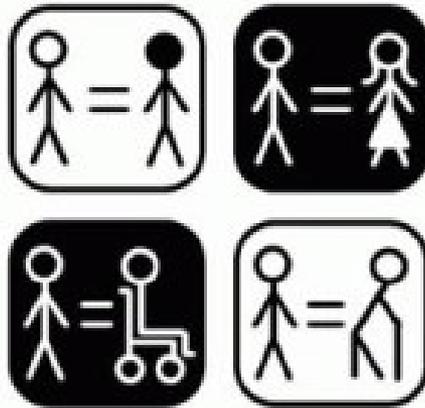
# Criterios para medicamentos huérfanos



- Grado de severidad de la enfermedad
- Logros superiores a estabilizar la enfermedad
- Enfermedad grave o incapacitante

2005 NICE Citizen's Council identifying criteria that the NHS may use to value orphan drugs more highly

- La gravedad de la enfermedad es un criterio, pero la rareza (escasez) no.



- Los pacientes con enfermedades raras tienen los mismos derechos que los de enfermedades comunes

*“ There appears to be no dispute about the fact that patients suffering from a rare disease deserve the same level of proven safety, quality and efficacy in their medicines as a patients suffering from more common diseases.”*

# Medicamentos Ultra-huérfanos

Según NICE (2008), las condiciones de los tratamientos ultra-huérfanos deben ser:

- Los altos costes de adquisición e ICER correspondientes altos.
- Uso únicamente en una enfermedad ultra huérfana (prevalencia UK <1/50.000).
- Enfermedades crónicas, gravemente incapacitante y / o potencialmente mortales.
- Uso potencial para toda la vida.

## Some ultra-orphan drugs in current use

Product	Condition	Prevalence	Preliminary estimated ICER (£ per QALY)
Agalsidase beta (Fabrazyme)	Fabry's	200	203,009
Imiglucerase (Ceredase)	Gaucher's (types I and III)	270	391,244
Laronidase (Aldurazyme)	Mucopolysaccharidosis (type 1)	130	334,880
Miglustat (Zavesca)	Gaucher's (type I)	270	116,800
Nonacog alfa (BeneFIX)	Haemiphilia B	350	172,500
Iloprost (Ventavis)	Primary pulmonary hypertension	100	23,324

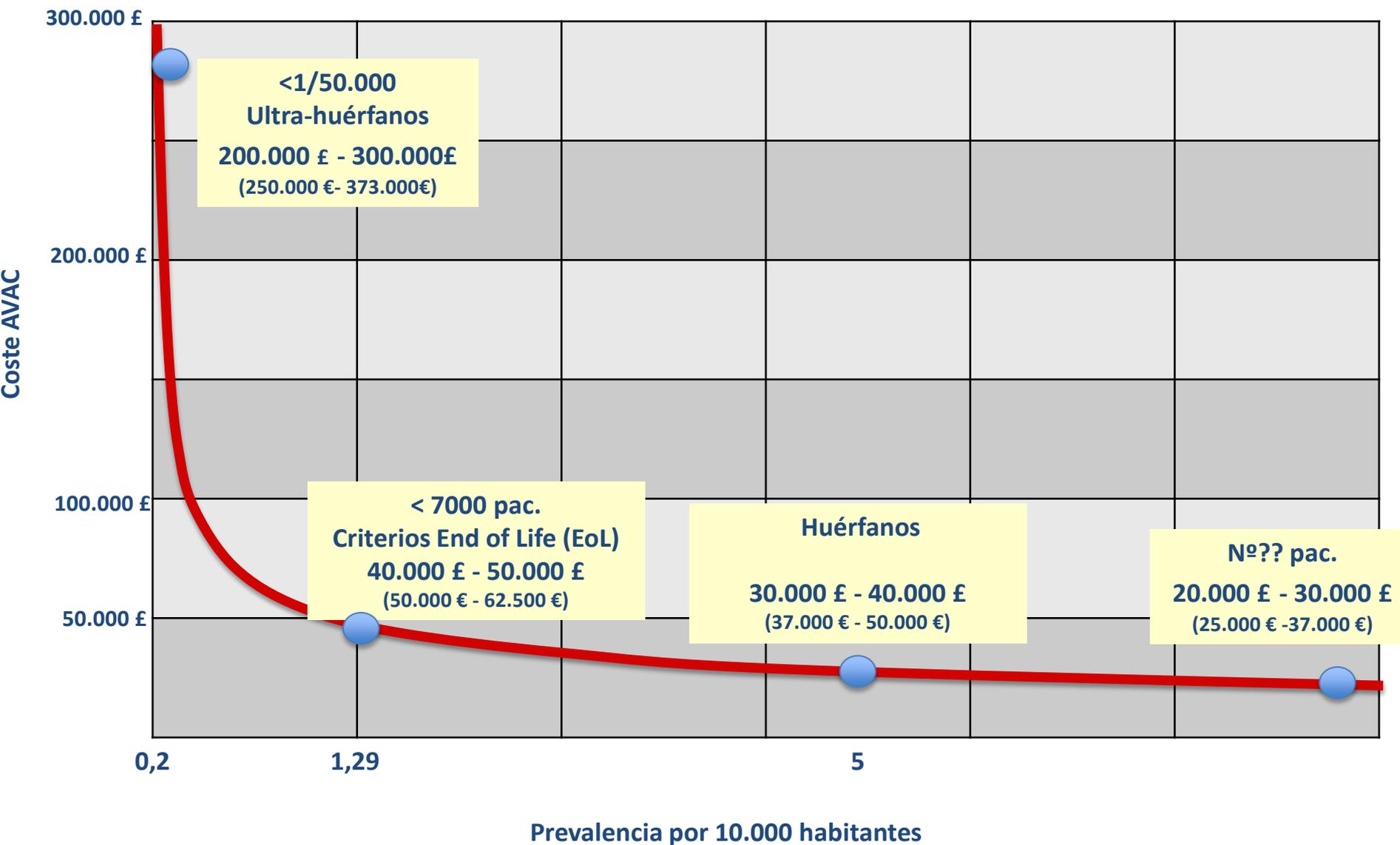
**200.000 - 300.000€ /AVAC \*\***

**250.000 - 373.000€**

Table 1 Proposed criteria for evaluation of orphan drugs and corresponding potential parameters

Criteria	Price Differential		
	Lower	Medium	Higher
Rarity	1:2,000 - 1:20,000 or COMP figures > 3 in 10,000 (11%)	1:20,000 - 1:200,000 or COMP figures 1-3 in 10,000 (51%)	Less than 1:200,000 or COMP figures less than 1 in 10,000 (38%)
Level of research undertaken	Literature review	Building on previous existing knowledge	“Blue-sky” – starting research & development programme in an unknown area
Level of uncertainty of effectiveness	Immature, but promising data	Appropriate surrogate end-points	Robust clinical end-points
Manufacturing complexity	Not complex – small molecule / classic galenic form	Moderately complex	Highly complex biological and galenic form
Follow up measures (additional benefits and associated costs)	Moderate to none	Designed to answer specific, defined, delineated question	Safety and efficacy studies + size and duration of study
Characteristics without direct cost impact			
Disease severity	Morbidity	Mortality / severe invalidity in adulthood	Mortality / severe invalidity as infant
Available alternatives / unmet medical need	Alternatives with similar characteristics	Alternatives – but offering strong innovation to the disease treatment	No alternative
Level of impact on condition / disease modification	Low	Medium	Strong
Use in unique indication or not	Existing orphan or non-orphan indications for the same molecule*	Potential for multiple indications	Unique indication – no other use possible

\*N.B. Another element could be the total revenues in the context of multiple indications for the same molecule owned by the same company



**<1/50.000**  
**Ultra-huérfanos**  
**200.000 £ - 300.000£**  
**(250.000 €- 373.000€)**

**< 7000 pac.**  
**Criterios End of Life (EoL)**  
**40.000 £ - 50.000 £**  
**(50.000 € - 62.500 €)**

**Huérfanos**  
**30.000 £ - 40.000 £**  
**(37.000 € - 50.000 €)**

**Nº?? pac.**  
**20.000 £ - 30.000 £**  
**(25.000 € -37.000 €)**

0,2

1,29

5

Prevalencia por 10.000 habitantes

Coste AVAC

300.000 £

200.000 £

100.000 £

50.000 £

# Conclusión

- ✓ Falta criterios establecidos valoración y financiación
- ✓ Nuevo papel y responsabilidad de las CCAA en la evaluación de medicamentos
- ✓ Búsqueda eficacia en medicamentos huérfanos