

**RWE4Decisions** REAL WORLD EVIDENCE  
**Symposium**

# Real-World Evidence over the Medicine's Lifecycle to Inform HTA/Payer Decisions

23 November 2023

BIP Meeting Center, Brussels

[www.rwe4decisions.com](http://www.rwe4decisions.com)

#RWE4Decisions



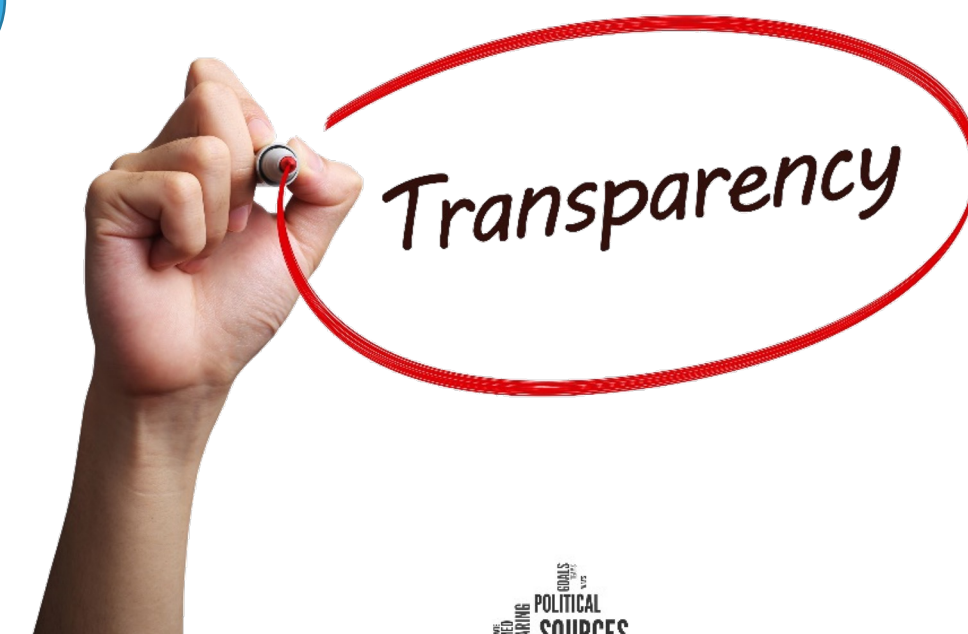
## Payer-Led Multi-Stakeholder Learning Network

Highly innovative technologies often have immature clinical evidence (and high prices)

Potential for Real World Evidence (RWE)

- to fill gaps in clinical development, and/or
- resolve uncertainties post-launch?

Can requirements be aligned across stakeholders and health jurisdictions/payers?





# Welcome by the co-moderators



**Hans-Georg Eichler**

Consulting physician,  
Association of Austrian Social  
Insurance Institutions



**Karen Facey**

Senior Adviser HTA, FIPRA  
RWE4Decisions Facilitator



# Keynote address by the Spanish EU Presidency



**Enrique Terol García**

Coordinating Advisor on Health,  
Permanent Representation of  
Spain to the European Union

## Data policies and patient access - EU Spanish Presidency priorities





**U**  
**23**

PRESIDENCIA  
ESPAÑOLA  
CONSEJO DE LA  
UNIÓN EUROPEA



# Priorities in health of the Spanish Presidency of the Council

Enrique Terol  
Health Counsellor  
Permanent Representation of Spain



# Priorities in Public Health

**Continue building the European Health Union**

**Protection of  
vulnerable people  
in the EU**

**Preparedness and  
response initiatives for  
new health alerts**

**Alignment of EU health  
agenda with 2030 Agenda  
&  
One Health approach**






**1) Regulatory**

**2) Political**






# Political Priorities

## Prevention and healthy lifestyles





-  Childhood obesity
-  Healthy Cities
-  Vaccination throughout life
-  Chronicity
-  Response to addictions

## Strengthening the capacities of health systems

### **Digital health in the EU.**

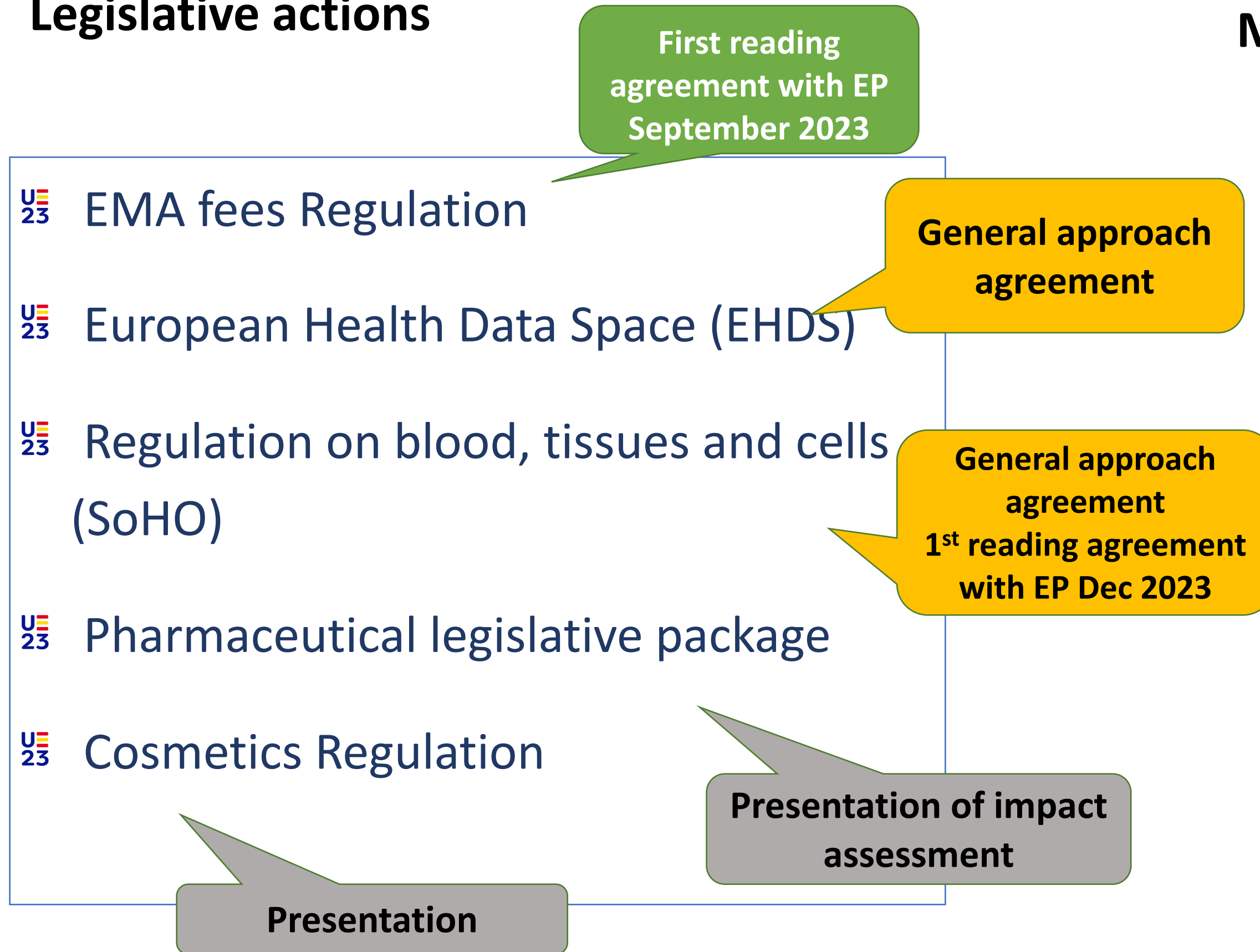
-  One Health:
  - health and environment plans.
  - further progress in the fight against AMR.
-  Open Strategic Autonomy in the health sector.
  - Strengthening and ensuring supply chains.
-  Support the ongoing activities of working groups of EU bodies (EMA, eHealth network, etc.)

## Support & development of EU health strategies

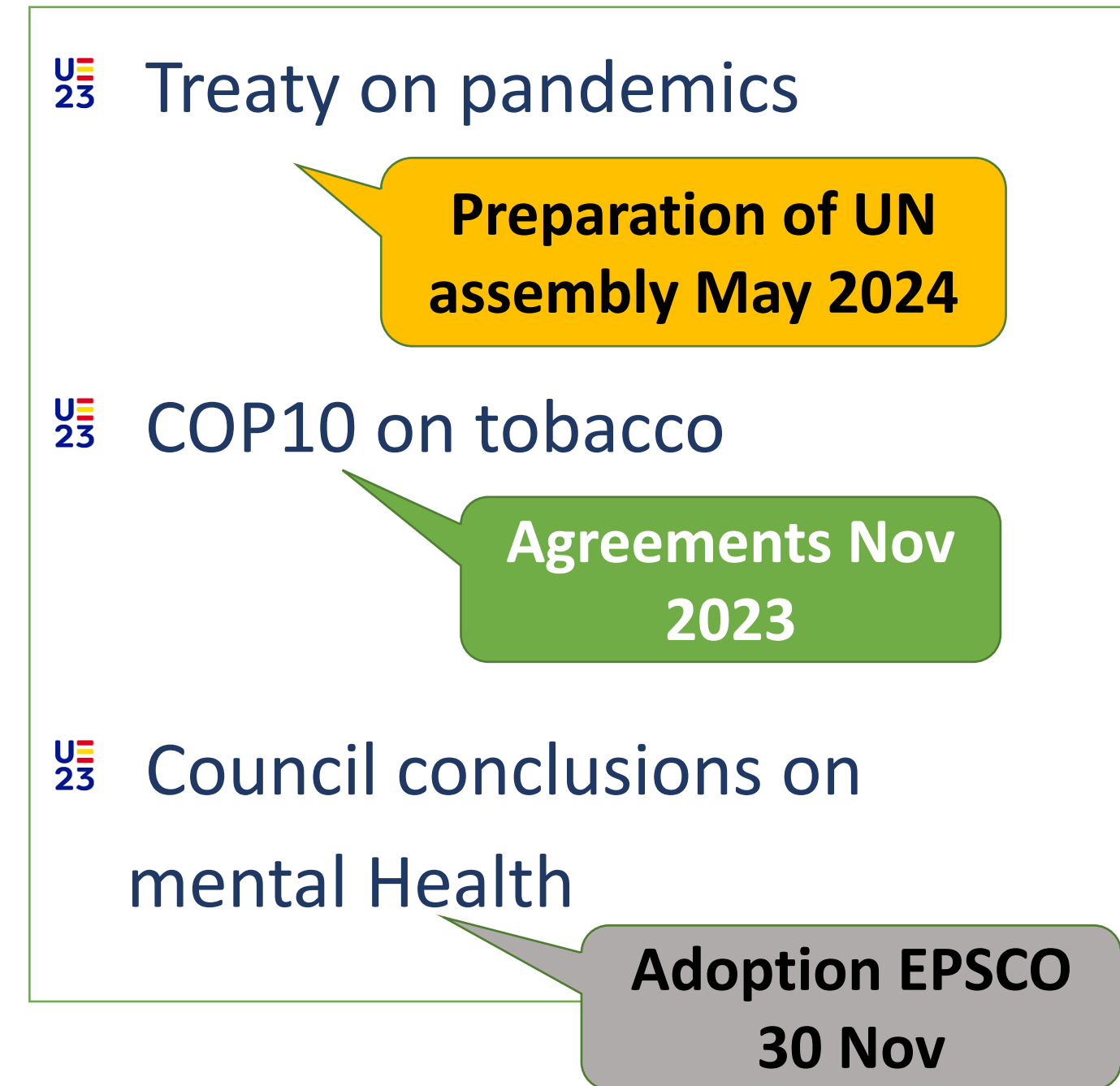
-  Aligning EU action with the Targets of Sustainable Development Goal 3.
  - HIV and its associated stigma.
  - Mental health (Council Conclusions)
-  Cancer
-  Rare Diseases & European Reference Networks
-  Organ donation & SOHO



## Legislative actions



## Multilateral and non legislative





# Conference on Personalised Digital Healthcare

## Dates:

September 27: Personalized Digital healthcare + eHN Semantic SG

September 28: Personalized Digital healthcare + eHN Technical SG

September 29: joint session at the national conference

## Venue:

León, Spain  
(320 km from Madrid)



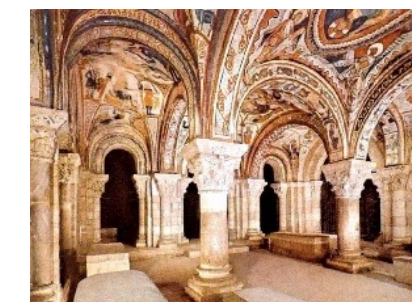
## Expenses:

### Transportation: Spain / EU Commission (\*)

*Airplane ticket to Madrid + speed train from Madrid to León  
speed train from León to Madrid + Airplane ticket from Madrid*

### Accommodation & meals & cultural activities: Spain

*Up to 2 persons per MS for September 27-29:  
1 representative for the eHN Semantic SG  
+ 1 representative for the eHN Technical SG*



# Regulation of the European Health Data Space

- Ambitious initiative
- First in its approach and dimensión
- Addressing three key different environments
  - ✓ Patients rights and protection
  - ✓ Healthcare systems organisation and provision of care
  - ✓ IT dimension: hardware , software, specifications etc.



# Understanding the European Health Data Space Regulation: Key Characteristics

- Unlocking the Potential of Health Data in Europe
- The European Health Data Space (EHDS) Regulation is a pivotal initiative aimed at
  - fostering collaboration,
  - innovation, and
  - data-driven healthcare across the European Union.

# Regulation of the European Health Data Space

- Primary Use of Health data
- Secondary Use of Health data
- Governance
- Infrastructure development
- Standardisation – common criteria
- Electronic Health Records (concept, definitions and standards)



# Actors

1. Data recipients : citizen & patients
1. Data holders: health data providers, public Health databases, Patient registers, research datasets etc.
2. Data controllers and processors
3. Nacional Data Authorities
4. Data access bodies

# Background

## Overview of the European Health Data Space:

- Fragmentation
- lack of common standards and data validation systems, lack of interoperability

## Need for a Unified Framework:

- Challenges in sharing health data across borders
- Importance of Data Interoperability: Enhancing healthcare outcomes through seamless data exchange



# Objectives of EHDS Regulation

- Promoting Interoperability: Ensuring the compatibility of health data systems
- Facilitating Cross-Border Data Exchange: Breaking down silos for improved healthcare coordination
- Empowering Patients: Granting individuals greater control over their health data
- Driving Innovation: Encouraging research and development in healthcare

# Legal Framework

**Article 114 TFEU** aims at improving the functioning of the internal market through measures for the approximation of national rules.

**Article 16 of the TFEU** protection of individuals with regard to the processing of personal data

**Alignment with GDPR:** Ensuring data protection and privacy

**Respect of Article 168 – 7** respect the responsibilities of the Member States for the definition of their health policy and for the organisation and delivery of health services and medical care.

**Governance Structure:** Establishing regulatory bodies for oversight and enforcement



# Scope of Health Data

- Definition of Health Data: Understanding the types of data covered
- Inclusion of Real-World Data: Expanding the scope beyond traditional clinical data
- Balancing Access and Privacy: Ensuring responsible use of health information

# Technical Infrastructure

- European Health Data Space Gateway: Creating a secure and standardized gateway for data exchange
- Health Data Spaces: Promoting the establishment of dedicated spaces for specific health-related purposes
- Interoperability Standards: Adopting common technical standards for seamless data sharing
- myHealth@EU
- HealthData@EU

# Cross-Border Collaboration

- Cross-Border Health Data Exchange: Encouraging collaboration between Member States
- Common Data Sets: Standardizing data formats to enhance compatibility
- Use Cases: Highlighting examples of cross-border projects and collaborations



# Patient Empowerment

- Digital Health Literacy: Promoting understanding and engagement among patients
- Patient Consent and Control: Opt-out & Opt-in Empowering individuals to manage their health data
- Patient Portals: Providing access to personal health records and information

# Research and Innovation

- Research Opportunities: Unlocking the potential of large-scale health data for scientific discovery
- Public health, epidemiology, healthcare management and health outcomes new treatments, post commercial studies
- Innovation Hubs: Supporting the development of new technologies and solutions
- Data-Driven Healthcare: Transforming healthcare delivery through evidence-based decision-making

# Challenges and Concerns

- Data Security and Privacy: Addressing concerns related to the protection of sensitive health information
- Ethical Considerations: Balancing the benefits of data use with ethical considerations
- Legal Harmonization: Overcoming legal and regulatory differences among Member States
- Implementation: technical structures and systems



# Key Milestones

- Entry into force
- Transitional periods per data sets characteristics and purposes
- Member State Responsibilities: Roles and responsibilities in implementing the regulation
- Monitoring and Evaluation: Assessing the impact and effectiveness of the EHDS Regulation

**THANK YOU!**





# The Policy Context for Real-World Evidence





# The Policy Context for Real-World Evidence



## **Marco Marsella**

Director of Digital, EU4Health  
and Health Systems  
Modernisation, DG SANTE,  
European Commission



# *The role of Real-World Evidence for Sustainable Healthcare Systems*

Marco Marsella

Director SANTE.C – Digital, EU4Health and Health Systems  
Modernisation

*RWE4Decisions Symposium, 23 November 2023*

# European Health Data Space (EHDS)

- The **EHDS legislative proposal (under negotiation)** aims at
  - Empowering individuals to take control of their health data
  - Enable the Union to fully exploit the potential to use and reuse health data
- The EHDS framework proposes a set of **rules, common standards and practices, infrastructures and a governance framework** that aims at providing a consistent, trustworthy, and efficient set-up for the use and reuse of health data for health, research, innovation, policy-making and regulatory purposes.
- Many of the data categories the proposed legislation **will apply to are real-world data** such as electronic health records, administrative data, genomic and other omics data, data from medical devices, registries, among others.



# HealthData@EU infrastructure pilot project



HealthData@EUpilot

17 partners, 9 countries

2 years

5 million euros of European fundings

Create and test a beta version of the European Health Data Space



Build a network of data platforms on a European scale...

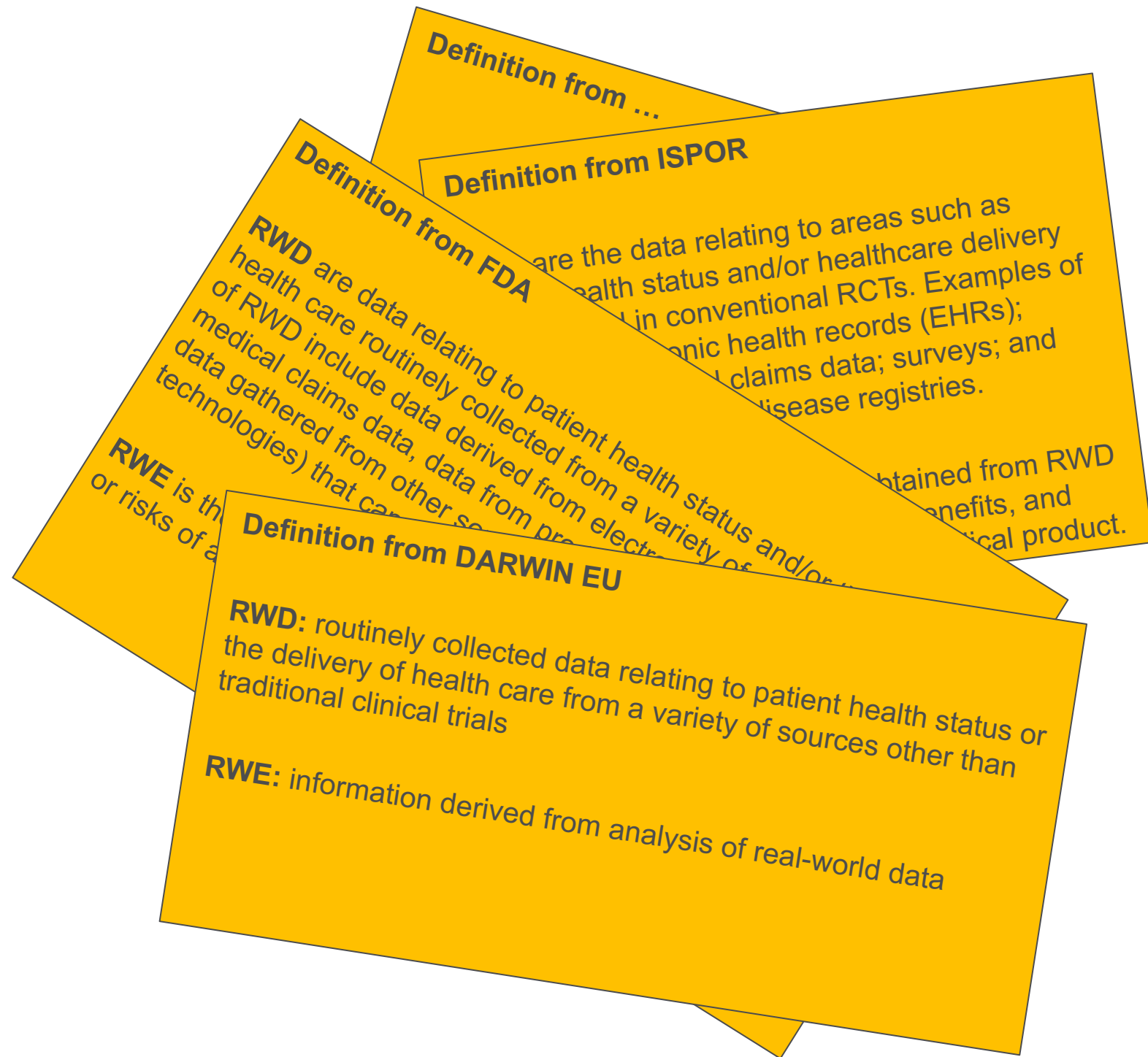


...tested by concrete cross-border use cases generating real-world evidence



European Commission

# RWD / RWE - towards a common language



- Strong engagement of regulatory agencies across the globe to **address the gaps due to a lack of RWD / RWE standardisation**
- **The Council for Harmonisation of Technical Requirements for Pharmaceuticals for Human Use (ICH)** leads an international level process to address these questions
- EMA, in collaboration with the Member States, supports the **European Commission's membership in ICH** as well as the development and implementation of ICH guidelines

# RWD / RWE - Medicinal products

- The **COM proposal reviewing the general pharmaceutical legislation, recognises new sources of evidence including RWD** as valuable for regulatory decision-making
- **RWE already now has an impact** on regulatory decision making (pre-authorisation, pharmacovigilance)
- **Methodological challenges remain** before RWE can become a routine part of decision making across all parts of the development of medicines development
- The **joint HMA/EMA Big Data Steering Group** is contributing to increase the utility of big data (incl. RWD), incl. via **DARWIN EU**
- Close cooperation among Commission services, the **European Medicines Agency** and **National Competent Authorities**

# Medical devices Regulations

- **New regulatory framework with stricter requirements in terms of clinical evaluation of medical devices (MD):**
  - Clinical evidence to be continuously updated throughout the lifetime of the product for all risk classes of devices
  - Clinical investigation mandatory for higher risk devices
- **Possible sources of clinical data for clinical evaluation** vary depending on the risk class of the device and its development stage
- **Why RWD is critical for the clinical evaluation of medical devices?**
  - To complement evidence generated from clinical investigation data
  - To meet MDR requirements for ongoing clinical evaluation



# MD initiatives with RWD / RWE relevance

## ■ Policy initiatives

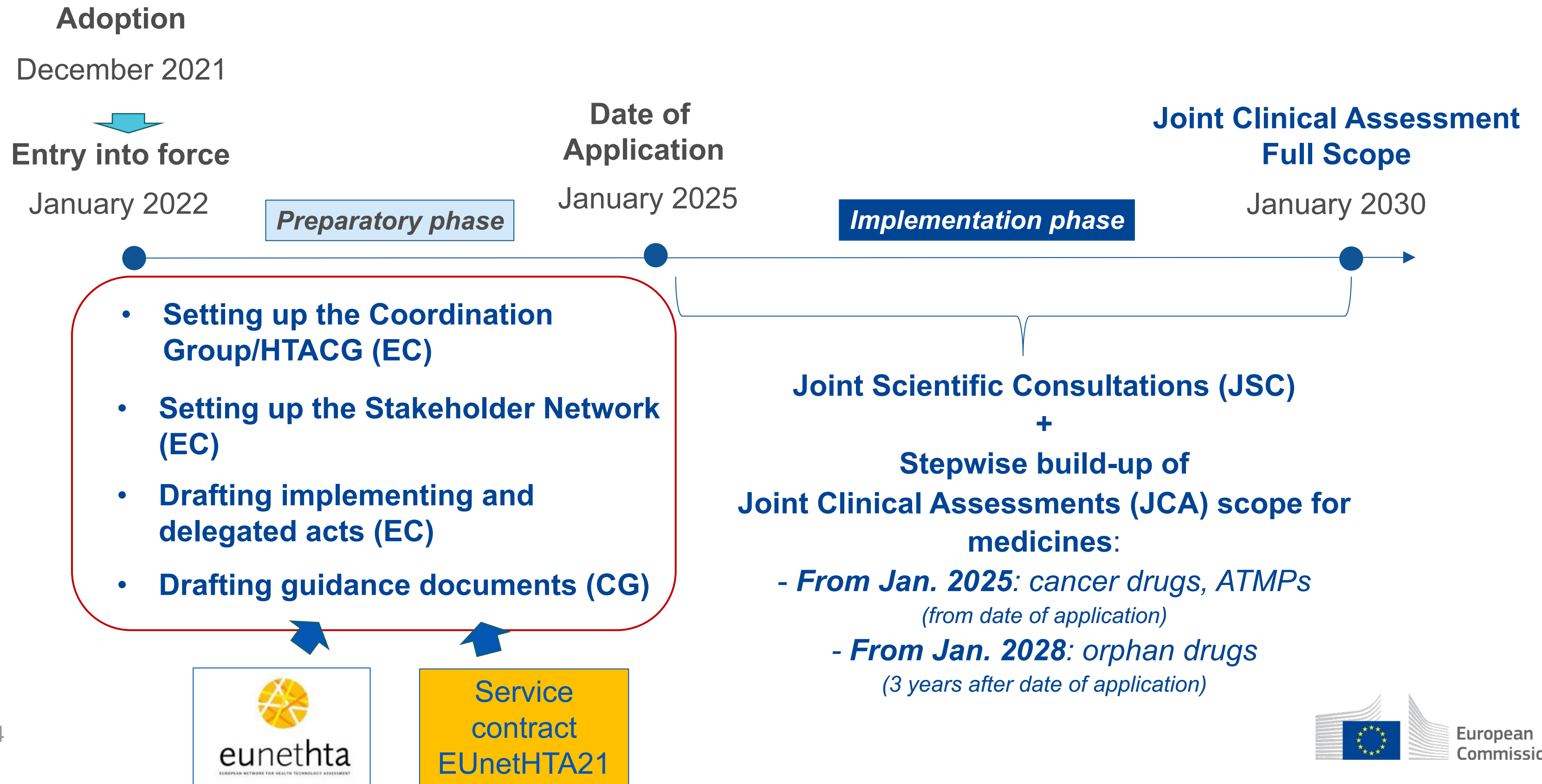
- **MDCG\* task force on orphan devices:** guidance on what constitutes acceptable clinical evidence gap and how to address them with RWD
- **MDCG task force on certificates with conditions:** guidance to notified bodies on the issuance of certificates with conditions incl. follow-up of conditions to generate RWE

## ■ Research initiatives

- [EU funded CORE-MD research project](#) (2021-2024) with the objective to review methods for medical device evaluation incl. methods to generate and combine RWD
- [new call for proposals under Horizon Europe](#) (deadline April 2024) on the development of a methodological framework for MD evaluation incl. the use of registries and other sources of RWD at pre- and post-market phase

\* The Medical Device Coordination Group (MDCG) is an expert committee representing the competent authorities of the MS. It assists the EC and the MS in ensuring a harmonised implementation of the medical devices Regulations.

# HTA Regulation - Implementation timeline



# RWE - HTA clinical domains

- Activities under the **HTA Regulation are restricted to the HTA clinical domains**, whereas the non-clinical domains remain within the responsibility of the MS
- The views on RWD / RWE methods / tools vary across the HTA community. A major concern is the **quality of data to assure high levels of evidence**
- To implement the regulation, the **HTA Coordination Group and its Subgroups will develop methodological guidance**
- **High degree of interdependencies:** The HTA Regulation will be impacted by RWD / RWE developments in the fields of medicinal products, medical devices and the EHDS

# RWE - Economic evaluation

- Economic evaluation remains within the responsibility of the Member States
- The Commission is facilitating cooperation in the network of the National Competent Authorities on Pricing and Reimbursement and Public Healthcare Payers (NCAPR)
- Regular NCAPR discussions on the challenges and opportunities of RWE

**RWE - Best-practice examples shared in NCAPR**

Real-world evidence to support Payer/HTA decisions about highly innovative technologies in the EU-actions for stakeholders

Karen M Facey <sup>1</sup>, Piia Rannanheimo <sup>2</sup>, Laura Batchelor <sup>3</sup>, Marine Borchardt <sup>3</sup>, Jo de Cock <sup>4</sup>

**DARWIN EU**

**The National Health Care Institute starts new project: Managing patient registries for expensive drugs**

**AIFA Italian Medicines Agency**  
home > Pricing and reimbursement > Monitoring Registers  
**Monitoring Registers**

**MINISTERIO DE SANIDAD U=23**  
Information System to determine the Therapeutic Value in Real Clinical Practice of Medicines with High Health and Economic Impact on the NHS (VALTERMED)

**Performance-based managed entry agreements for new medicines in OECD countries and EU member states**  
How they work and possible improvements going forward

European Commission



# Conclusions – Concerted efforts needed to make health systems fit for RWD / RWE

**Continue work on methodologies / tools and data, e.g.,**

- Support **standardised RWD / RWE data collection**
- Support the **development of RWD quality standards and validation processes**
- Support the establishment of **representative databases for RWD use**
- Support the **development of evidence synthesis methods** (e.g. meta-analytical techniques, AI)
- Support **case studies demonstrating how RWD / RWE can be used** (e.g. for clinical decision-making, regulatory decision-making, HTA, managed entry agreements)
- Support guidance on the **level of evidence needed at different stages in a health technology's life cycle** (R&D, pre-clinical, clinical, authorisation, post-market authorisation phases)

**Ensure involvement of relevant stakeholders**



# Thank you



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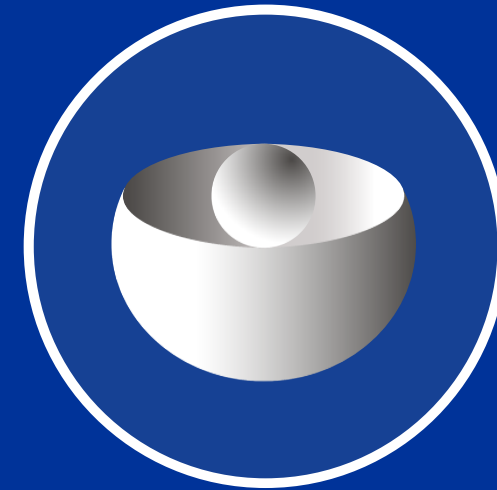
# The Policy Context for Real-World Evidence



## **Patrice Verpillat**

Head of Real-World Evidence  
Workstream, European  
Medicines Agency





EUROPEAN  
MEDICINES  
AGENCY

# Scaling-up Real-World Evidence generation in Europe – DARWIN EU

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RWE4Decisions Symposium – Brussels

Presented by Patrice Verpillat on 23 November 2023  
Data Analytics and Methods Taskforce, Real World Evidence Workstream

An agency of the European Union



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# Clinical evidence 2025: Real world evidence

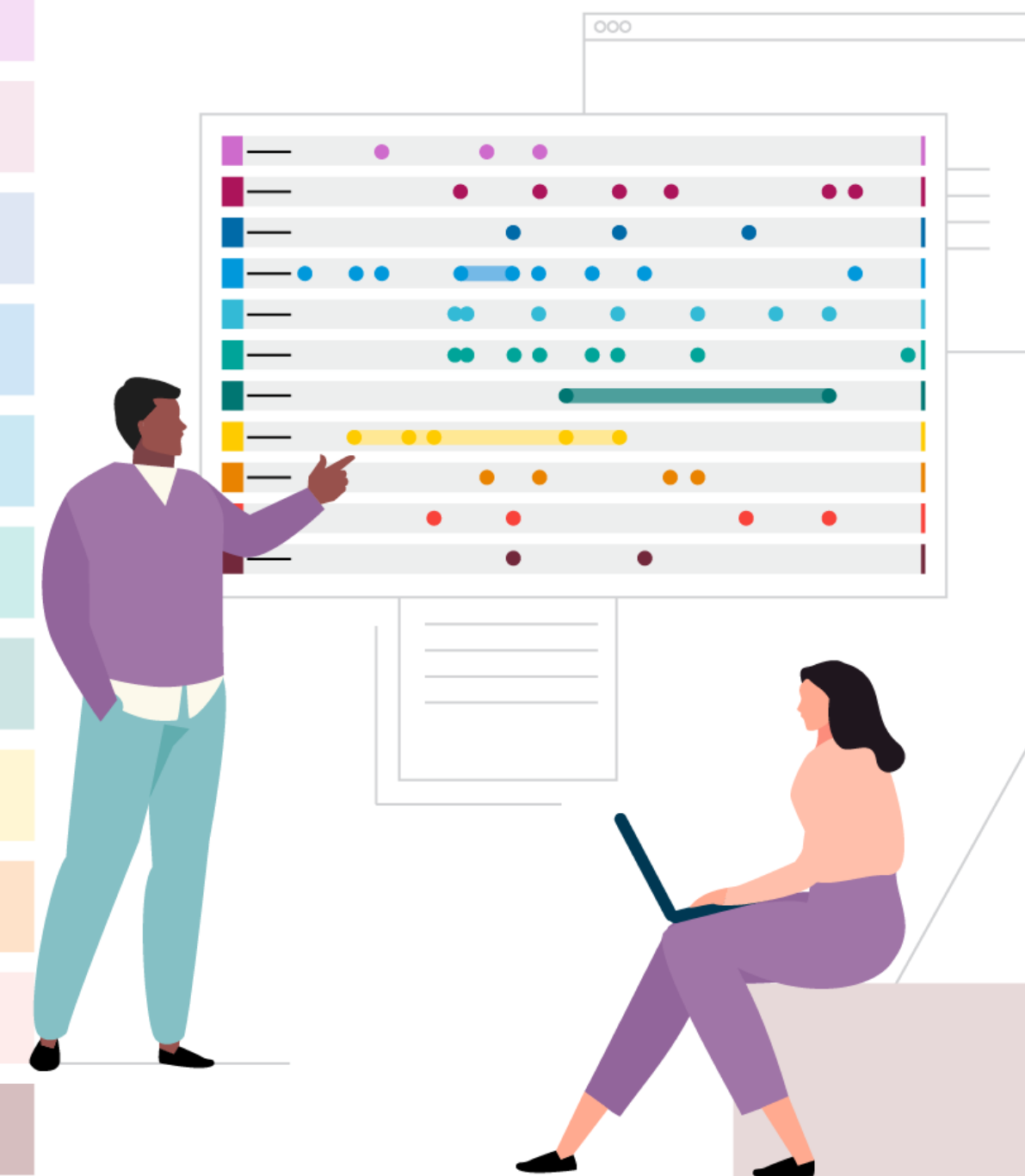
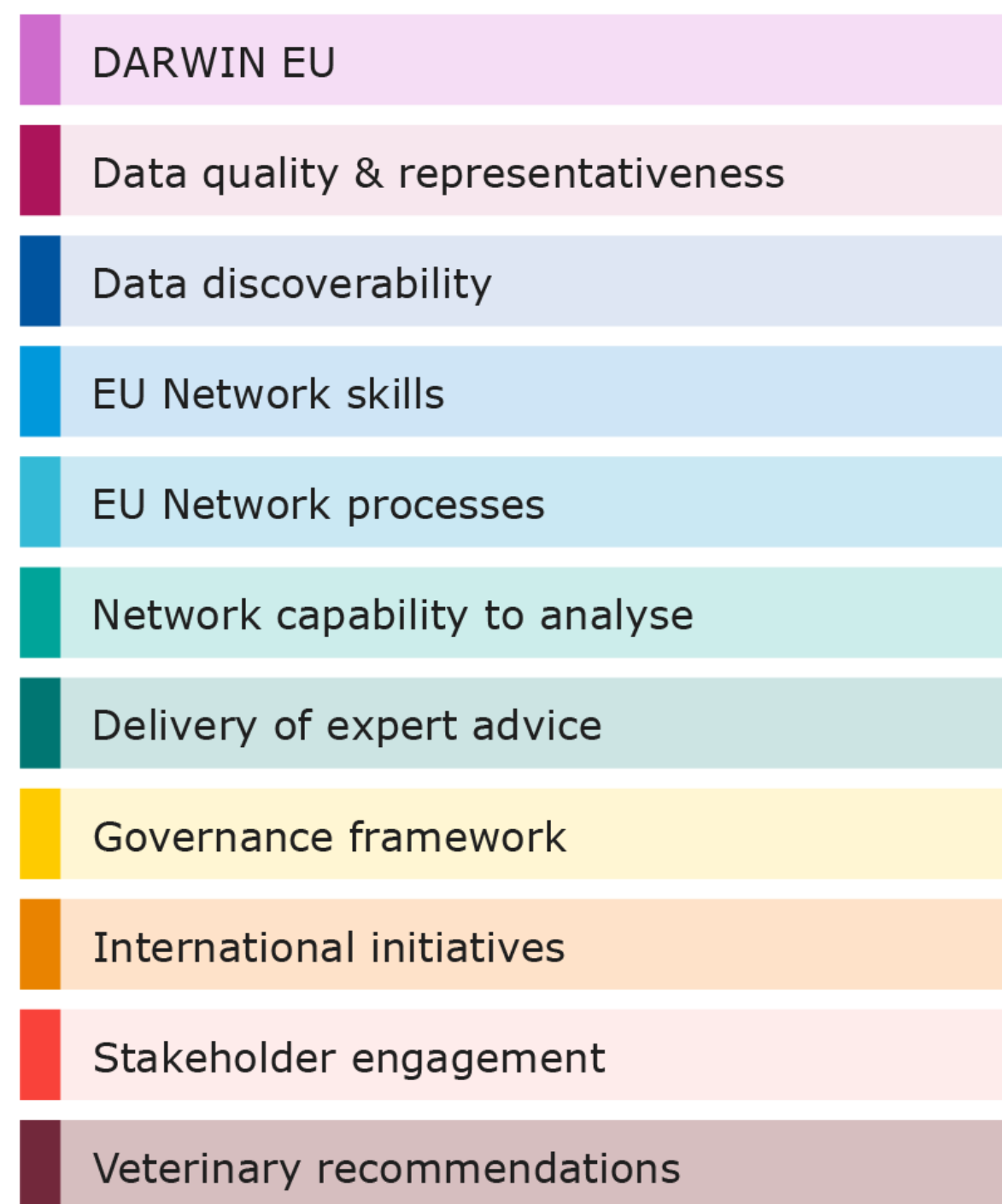
## Enable the Use & Establish the Value of RWE

- Enable data access (including via EHDS)
- Build processes
- Set standards
- Validate methods
- Train/share knowledge & Manage change
- Establish value across various use cases
- Internationalise (build on ISPE-ISPOR, ICMRA, ICH)



# Big Data Steering Group workplan 2022-2025

*Framework - to enable use of data and facilitate its integration into regulatory decision making*





# 3 main pathways for generating RWE



## EMA studies using in-house databases

- **Primary care** health records from the **France, Germany, UK, Italy, Spain** and **Romania**



## Studies procured through EMA FWCs

- New framework contract (FWC) since September 2021: services of **8 research organisations** and academic institutions
- Access to **wide network of data sources**: 59 data sources from 21 EU countries
- Ability to leverage external **scientific expertise**



## DARWIN EU®

- Coordination Centre launched February 2022
- Onboarded first **10 data partners in 2022**. Additional 10 data partners to **be added each year** for 2023 and 2024
- **Multiple studies** finalised assessing different pilot use cases for regulatory purpose and beyond

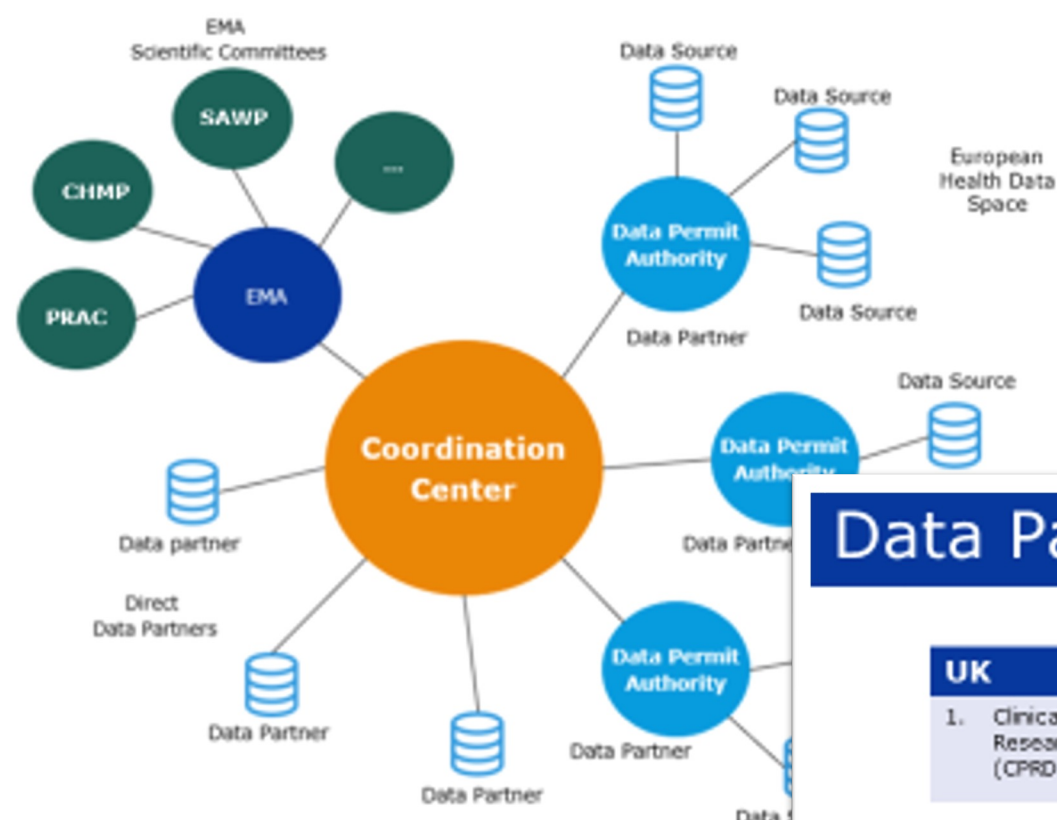
## Data Analysis and Real-World Interrogation Network



DARWIN EU® is a federated **network of data, expertise and services** that supports better decision-making throughout the product lifecycle by generating reliable **evidence from real-world healthcare data**

### FEDERATED NETWORK PRINCIPLES

- Data stays **local**
- **Use of Common Data Model** (where applicable) to perform studies in a timely manner and increase consistency of results



## Data Partners – Phase I



### UK

1. Clinical Practice Research Datalink (CPRD GOLD)

### Belgium

2. IQVIA Belgium Longitudinal Patient Data

### France

3. Bordeaux University Hospital

### Spain

4. IDIAPJGol
5. Parc Salut Mar Barcelona, Hospital del Mar (IMIM)

### Finland

6. Auria Clinical Informatics at Hospital District of Southwest Finland (HDSF)

### Estonia

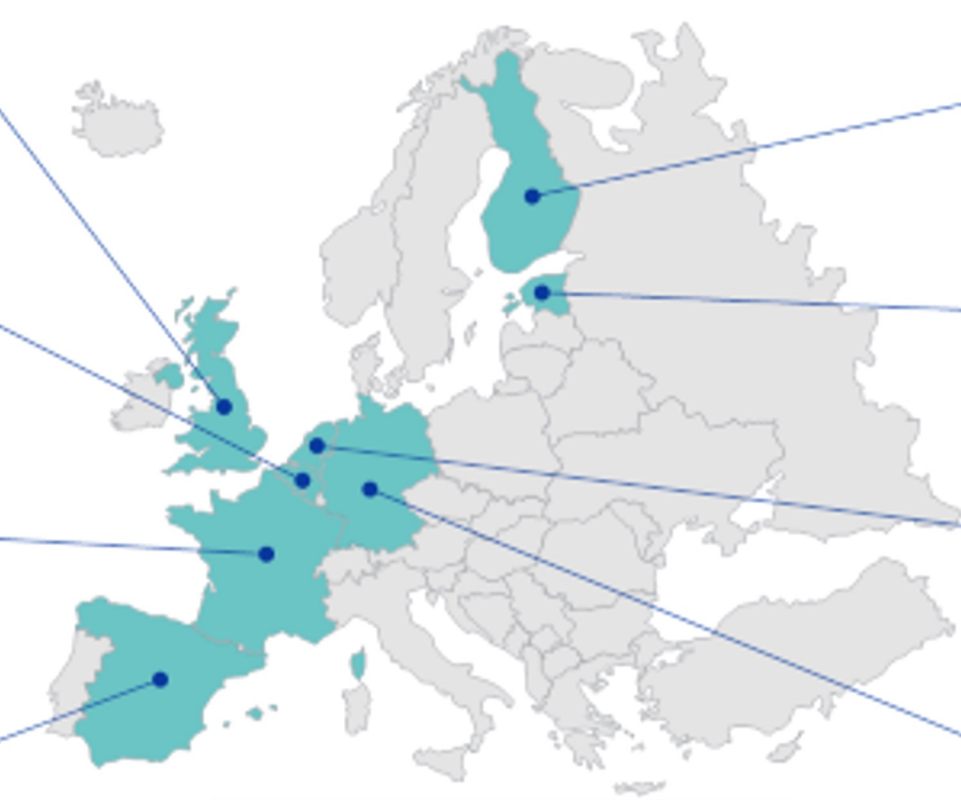
7. University of Tartu (Biobank)

### Netherlands

8. Integrated Primary Care Information
9. Netherlands Comprehensive Cancer Organisation

### Germany

10. IQVIA Germany Disease Analyser



~26 million active patients

# Use cases: How RWE can support decision-making?

1

## Understand the clinical context

Disease epidemiology

Clinical management

Drug utilisation

2

## Support the planning and validity

Design and feasibility of studies

Representativeness and validity of completed studies

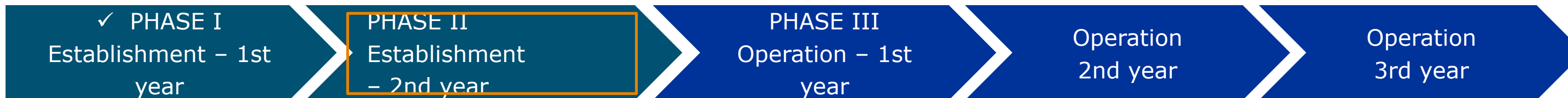
3

## Investigate associations and impact

Effectiveness and safety studies

Impact of regulatory actions

# DARWIN EU<sup>®</sup> timelines



## Phase I – February 2022

- Start running pilot studies to support EMA committees – **First benefits delivered**
- Consultation of stakeholders

## Phase II - 2023

- Support the majority of Committees in their decision-making with reliable RWE
- Expand to other stakeholders

## Phase III - 2024

Up-scale delivery and **capacity to routinely support scientific evaluations** of EMA's committees by delivering studies and maintaining data sources

## Operation - 2025/2026

- DARWIN EU fully operational and evolves to meet the needs of the EU Regulatory Network
- **Integration with the EHDS**

	Phase I	Phase II	Phase III	Operation 2	Operation 3
<b>Total number of studies</b>	4	16	72	145	145



# Examples of ongoing/recently completed **DARWIN EU** studies

Background all-cause **mortality rates in patients with severe asthma aged ≥12 years old**  
[[EUPAS103936](#)]

**CHMP**  
Complex

**Multiple myeloma: patient characterisation, treatments and survival**  
[[EUPAS105033](#)]

**HTA / Payers**  
OTS

**EHDS** natural history & risk factors for coagulopathy and COVID-19

**EC / EHDS**  
Complex

Drug utilisation study of **medicines with prokinetic properties** in children and adults diagnosed with gastroparesis

**NCA**  
OTS

**Effectiveness of COVID-19** vaccines against severe COVID-19 and post-acute outcomes of SARS-CoV-2 infection

**ECDC - VMP**  
Complex

**Naloxone** use in treatment of opioid overdose  
[[EUPAS105644](#)]

**CHMP**  
OTS

**Drug utilisation** study on co-prescribing of **endothelin receptor antagonists (ERAs)** and **phosphodiesterase-5 inhibitors (PDE-5is)** in pulmonary arterial hypertension.  
[[EUPAS106052](#)]

**CHMP**  
OTS

Drug utilisation study of prescription **opioids**  
[[EUPAS105641](#)]

**PRAC**  
OTS

**OTS** = off-the-shelf study

# DARWIN EU supporting HTA/Payer decision-making

## Workshop October 2022

- Need to address concerns that may be an obstacle to use RWD for decision making, e.g. quality of RWD => [EU Data Quality Framework \(EU DQF\)](#)
  - Further deep-dives to be developed with RWD deep-dive under preparation
- Which research questions can be addressed will depend on available RWD
  - RWD will increase in volume and variety as network of DPs of DARWIN EU grows
- Focus first on the potentially most feasible studies
- Transparency on how DARWIN EU operates will be helpful
  - All protocols and reports of DARWIN EU studies published in EU PAS register => Public release of [EMA-HMA catalogues of real-world data sources & non interventional studies](#) planned for Q1 2024

# Workshop outcomes

## On topics to be addressed by studies

- **Effectiveness of medicines** is key to support HTA/Payer decision making
  - To bridge the gap in situations where authorization is based on limited evidence
- **Natural disease history**
  - Provide a better understanding of standard of care, sequence of treatments...
  - External validation of patient population targeted in clinical trials

## Two pilot studies agreed

- **Effectiveness study** to assess overall survival of patients with non-small cell lung cancer treated with selected immunotherapies as first line
  - **Study protocol under development**
- **Natural history of multiple myeloma** to characterise MM patients, including treatments (sequences) received and overall survival
  - **Study completed; report under development**

## Further information

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# The Policy Context for Real-World Evidence



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Entrepreneurs (EUCOPE)

# RWE4Decisions 2023



**Karen Facey**  
RWE4Decisions Facilitator



# Key takeaways from RWE4Decisions 2022 Symposium

1

Continue to build trust among stakeholders

2

Link with **Payer networks** to support shared learnings and identification of RWE needs

3

Continue engagement with **European Medicines Agency (EMA)**

4

Work with **clinicians** to understand how to support a learning health system

5

Go beyond “**patient centricity**” to co-creation



# RWE4Decisions REAL WORLD EVIDENCE 2023 STEERING GROUP

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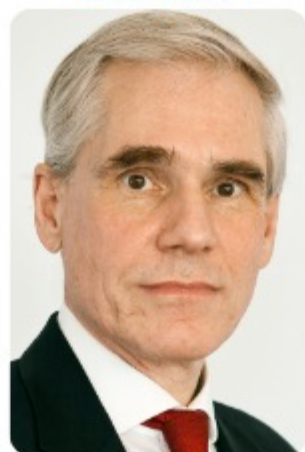
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Senior Adviser  
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**Industry**





# The RWE4Decisions multi-stakeholder community



Secretariat:

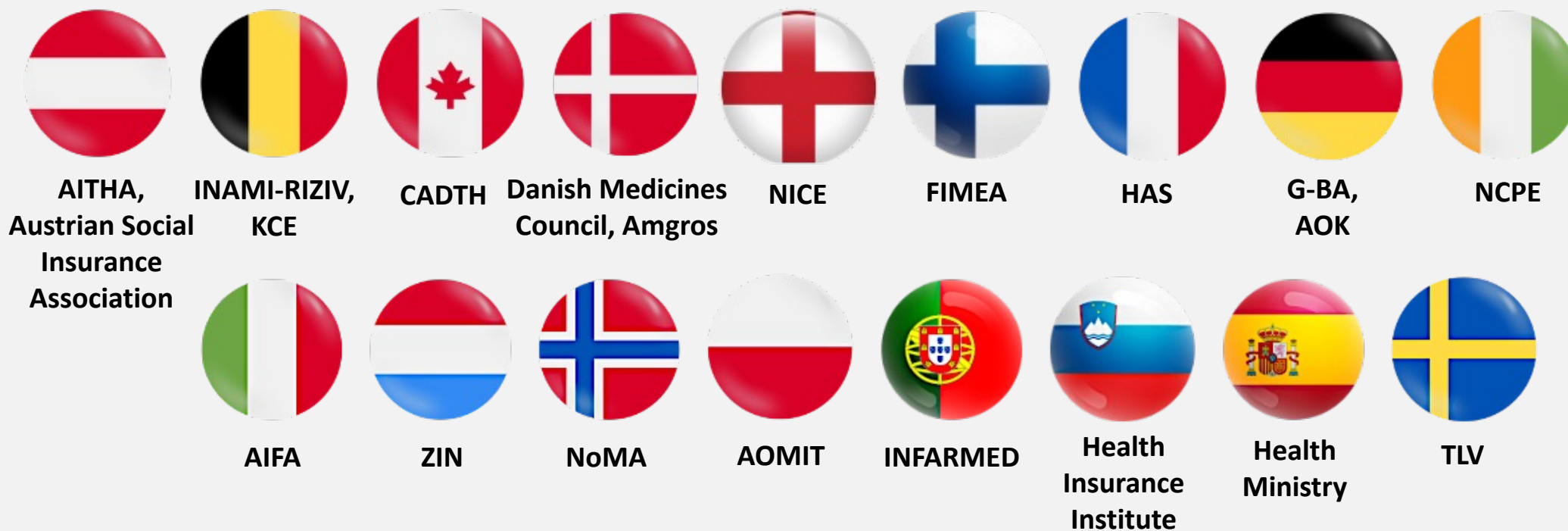
FIPRA

## MULTI-STAKEHOLDER COMMUNITY

**Clinicians/Researchers/R  
registry-holders**

UZ Leuven, ECO, EORTC,  
EBMT, Canadian Registry

**HTA bodies, Payers and Health Ministries**



**Analytics  
experts/Statisticians**  
Aetion, Flatiron, EFSPi

**Patients/Foundations**

EURORDIS, ECO, ECPC  
AfM-Téléthon, SMA UK

**Academia**  
Università Cattolica del  
Sacro Cuore,  
University of Edinburgh,  
Mc Master University,  
University of Quebec,  
University Lyon, University  
of Helsinki

**Regulators**

European Medicines  
Agency (EMA)

RWE4Decisions 2023 Symposium

“Learning by Doing”

**Industry**

EUCOPE, AstraZeneca,  
Boehringer Ingelheim, Novartis,  
Pfizer, Roche, Takeda

# RWE4Decisions Dialogues leading to Learned Papers

## The use of real world data throughout an innovative medicine's lifecycle

### 1. Introduction and objectives

The challenge for health policies is to provide high quality of care for all, within a sustainable health system. Innovations in healthcare such as innovative medicines play a crucial role in improving population's health. The way these medicines are developed, their price and their usage in daily practice can strongly impact on the quality and the sustainability of our health system especially in the area of rare diseases.

## Outcomes based pricing and reimbursement of innovative medicines with budgetary limitations

Discussion document for the multistakeholders meeting on pharmaceuticals (Meeting DG GROW 12<sup>th</sup> September 2017)

### 1. Introduction

Health policies in the EU aim to increase the healthy life expectancy of citizens within the limits of the available public resources. In order to achieve this objective, there is a need to improve the quality, effectiveness, and efficiency of EU health systems.<sup>1</sup>

In addition, there is a continuous need for innovative health technologies, such as medicines, that help to substantially reduce morbidity and mortality, and improve quality of life.<sup>2</sup> However, these truly innovative technologies<sup>3</sup> usually come at an extra cost, and – given the requirement for efficiency and sustainability – it is of key importance to establish appropriate methods and procedures for pricing and reimbursement (P&R) of these technologies.

The increasing focus in our healthcare systems on outcomes that matter for patients may create new opportunities in this regard. P&R decisions for innovative technologies that account for the added value that those technologies deliver for patients and society overall, will encourage the continued search for truly innovative technologies. Value can thereby be defined as "the importance, worth, or usefulness of something".<sup>4</sup> It is recognised that the value of a new medicine is determined by both disease and treatment related characteristics.<sup>5</sup> Indeed, if the impact of a disease on patients is high (severe symptoms, disability, reduced life expectancy etc.) and the medicine provides a substantial impact in reducing morbidity, improving quality of life or life expectancy, it can be considered of high value.

Annemans and Makady *Orphanet Journal of Rare Diseases* (2020) 15:127  
https://doi.org/10.1186/s13023-020-01370-3

Orphanet Journal of Rare Diseases

### POSITION STATEMENT

### Open Access

## TRUST4RD: tool for reducing uncertainties in the evidence generation for specialised treatments for rare diseases

Lieven Annemans<sup>1\*</sup> and Amr Makady<sup>2</sup>

### Abstract

**Background:** Many treatments developed for rare diseases will have an Orphan Medicinal Product (OMP) designation, indicating that they are likely to deliver benefit in an area of high unmet need. Their approval may be based on a small or uncontrolled trial, as randomised controlled trials (RCTs) of sufficient size are often difficult to conduct, or repeat, as a result of the rarity of the condition, sparsity of patients, or for ethical reasons. Furthermore, many products are given a conditional marketing authorisation, requiring additional evidence to be collected after product launch. This is even more challenging with the advent of advanced therapeutic medicinal products, which use novel scientific approaches like gene or somatic cell therapy.

**Issue:** Given the high unmet need associated with these products, there is pressure for Health Technology Assessment (HTA)/reimbursement bodies to enable rapid access to effective treatments. However, there is often only limited evidence available for assessment.

**Methods:** TRUST4RD proposes an approach to identify uncertainties of most concern for decision-makers by developing an iterative and informed dialogue amongst stakeholders (including manufacturers, clinicians, patients, regulatory- and HTA agencies and payers), so that potential approaches to resolution can be discussed. As evidence is generated, uncertainties are reviewed and prioritised, and evidence-generation plans revised or clarified accordingly. The aim is to develop – both pre- and post-HTA submission – a better understanding of evidence requirements versus evidence-generation trade-offs as an evidence base grows and the potential value of a product becomes clearer.

**Conclusion:** TRUST4RD presents guidance on defining uncertainties and evidence gaps in the assessment of value and value for money of specialised treatments for rare diseases. It also provides guidance on the potential of Real World Evidence (RWE) to help address such uncertainties, including the typology of evidence uncertainties, the importance of different uncertainties and the data sources available to address them before and after HTA submission. In making use of the guidance, authorisation and reimbursement discussions on such treatments can be embedded in an evidence-rich context, thereby ensuring value to all parties, particularly to patients.

## Real-world evidence to support Payer/HTA decisions about highly innovative technologies in the EU—actions for stakeholders

Karen M. Foy<sup>1</sup>, Rannanheimo<sup>2</sup>, Laura Batchelor<sup>3</sup>, Marine Borchardt<sup>4</sup> and Jo...

### Policy

**Cite this article:** Foy KM, Rannanheimo P, Batchelor L, Borchardt M, de Cock J (2020) Real-world evidence to support Payer/HTA decisions about highly innovative technologies in the EU—actions for stakeholders. *International Journal of Technology Assessment in Health Care* 36(1):1–11. https://doi.org/10.1017/S0264623220000605

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*International Journal of Technology Assessment in Health Care*

www.cambridge.org/thc

### Commentary

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Accepted: 22 September 2022

**Key words:** real-world data; real-world evidence; guidance; health technology assessment; payers

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G.C., S.C., O.D., F.A.Z.V.K., and S.T.: joint first authorship.

## Can we use existing guidance to support the development of robust real-world evidence for health technology assessment/payer decision-making?

Gorana Capkun<sup>1\*</sup>, Sorcha Corry<sup>2</sup>, Oonagh Dowling<sup>3</sup>, Fatemeh Asad Zadeh Vosta Kolaei<sup>4</sup>, Shweta Takyar<sup>5</sup>, Cláudia Furtado<sup>6</sup>, Páll Jönsson<sup>7</sup>, Diane Kleineremans<sup>8</sup>, Laurie Lambert<sup>9</sup>, Anja Schiel<sup>10</sup> and Karen Facey<sup>11</sup>

<sup>1</sup>Novartis Pharma AG, Basel, Switzerland; <sup>2</sup>Novartis Oncology, East Hanover, NJ, USA; <sup>3</sup>HTA Division, INFARMED, National School of Public Health, New University of Lisbon, Lisbon, Portugal; <sup>4</sup>Data and Real World Evidence, NICE, London, UK; <sup>5</sup>Drugs Reimbursement, INAMI, Brussels, Belgium; <sup>6</sup>CADTH, Ottawa, ON, Canada; <sup>7</sup>Lead Methodologist in Regulatory and Pharmacoeconomic Statistics, NAMA, Oslo, Norway and <sup>8</sup>TIPRA, Belgium and Usher Institute, University of Edinburgh, Edinburgh, UK

### Abstract

Advances in the digitization of health systems and expedited regulatory approvals of innovative treatments have led to increased potential for the use of real-world data (RWD) to generate real-world evidence (RWE) to complement evidence from clinical trials. However, health technology assessment (HTA) bodies and payers have concerns about the ability to generate RWE of sufficient quality to be pivotal evidence of relative treatment effectiveness. Consequently, there is a growing need for HTA bodies and payers to develop guidance for the industry and other stakeholders about the use of RWD/RWE to support access, reimbursement, and pricing. We therefore sought to (i) understand barriers to the use of RWD/RWE by HTA bodies and payers; (ii) review potential solutions in the form of published guidance; and (iii) review findings with selected HTA/payer bodies. Four themes considered key to shaping the generation of robust RWE for HTA bodies and payers were identified as: (i) data (availability, governance, and quality); (ii) methodology (design and analytics); (iii) trust (transparency and reproducibility); and (iv) policy and partnerships. A range of guidance documents were found from trusted sources that could address these themes. These were discussed with HTA experts. This commentary summarizes the potential guidance solutions available to help resolve issues faced by HTA decision-makers in the adoption of RWD/RWE. It shows that there is alignment among stakeholders about the areas that need improvement in the development of RWE and that the key priority to move forward is better collaboration to make data usable for multiple purposes.

### Introduction

Real-world data (RWD) has been used for decades by regulators for pharmacovigilance purposes and by HTA for contextualization of evidence to a specific health system setting, to extrapolate outcomes and input to economic modeling. With the advancement of digitization in health systems and expedited regulatory approvals of innovative treatments, there is greater potential for the use of RWD to generate real-world evidence (RWE) to complement evidence from clinical trials. However, many health technology assessment (HTA) bodies and payers have voiced concerns about the ability to develop RWE of sufficient quality to be pivotal evidence of relative treatment effectiveness, and argue that randomized controlled trials (RCTs) should remain the key evidence base (1). HTA is based on an evidence-based medicine paradigm, with a foundation of critical review of

2016/2017

Use of RWD throughout medicine's lifecycle  
Outcomes based pricing & reimbursement of medicines with budgetary limitations

2018

TRUST4RD  
Tool for Reducing Uncertainties in evidence generation for Specialised Treatments for Rare Diseases

2020

RWE4Decisions recommended actions for stakeholders to support payer/HTA decisions about highly innovative technologies

2022

Can we use existing guidance to support development of robust RWE for HTA/payer decision-making?



# More key takeaways from 2022

6

Importance of HTA Regulation implementation

7

Define priorities for use of RWD by Payers

8

Discuss cross border data strategies for RWD collection - EHDS, EU-wide disease registries to meet payers needs, cross border collaboration etc

9

Share experiences of implementation of **Outcomes-Based Managed Entry Agreements/ Post Launch Evidence Generation (PLEG)**

10

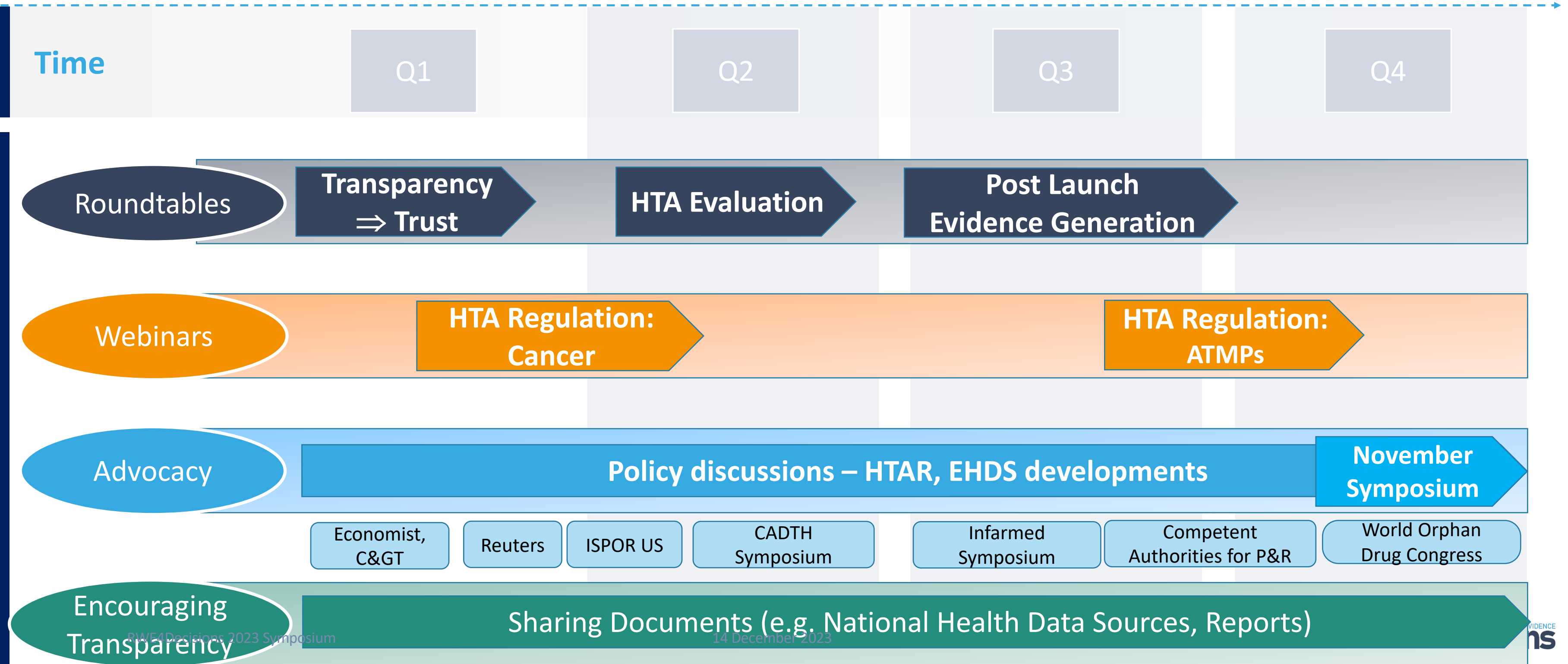
Coordinate and share learnings





# RWE4Decisions 2023

## A variety of ways of learning across the multi-stakeholder network







RWE4Decisions REAL WORLD EVIDENCE

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## Outputs

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**+ Policy Engagement**

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**+ Published Papers**

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**+ Workshop Reports**

---

**+ National Health Data Sources**

---

**+ Event Reports**

**Concepts for the generation of routine practice data and their analysis for the benefit assessment of drugs according to §35a Social Code Book V**

CADTH Methods and Guidelines

# Guidance for Reporting Real-World Evidence

May 2023

**ASSESS**  
HEALTH TECHNOLOGIES

**METHODOLOGICAL GUIDE**

## Real-world studies for the assessment of medicinal products and medical devices

REPORT January 2022

## Generating Evidence from Real-World Data in Health Technology Assessment

Methodological guideline

## NICE real-world evidence framework



EUROPEAN MEDICINES AGENCY  
SCIENCE MEDICINES HEALTH

- 1 17 April 2023
- 2 EMA/CHMP/564424/2021
- 3 Committee for Medicinal Products for Human Use (CHMP)

- 4 Reflection paper on establishing efficacy based on single-arm trials submitted as pivotal evidence in a marketing authorisation
- 5
- 6
- 7 Considerations on evidence from single-arm trials

- 8 Draft

Draft agreed by Drafting Group on single-arm trials	27 January 2023
Adopted by CHMP for release for consultation	17 April 2023
Start of public consultation	21 April 2023
End of consultation (deadline for comments)	30 September 2023

- 9 Comments should be provided using this [template](#). The completed comments form should be sent to [RP-SATs@ema.europa.eu](mailto:RP-SATs@ema.europa.eu)

Keywords	Single-arm trials, non-randomised trials, regulatory decision making
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11

### Real-world data and real-world evidence in regulatory decision making

CIOMS Working Group report  
Draft, 6 June 2026

This report was posted for comment on 6 June 2023 at: <https://cioms.ch/working-groups/real-world-data-and-real-world-evidence-in-regulatory-decision-making/>.

The CIOMS Working Group (WG) XIII welcomes your input to the report, or any parts of it. A list of WG XIII members can be found on the CIOMS website. A detailed list will be appended to the final report.

Please note that the layout will be improved in the final version, and best efforts will be made to correct remaining typographical and/or grammatical errors, as well those pertaining to references.

Permissions are being sought to reproduce some of the illustrative materials included in this report. We welcome responses from organisations that own any of these materials and have not yet been contacted in this regard.

Please submit your comments using the form posted on the CIOMS website at <https://cioms.ch/working-groups/real-world-data-and-real-world-evidence-in-regulatory-decision-making/>.

The timeline for submission of comments is 14 July 2023.

Thank you.





EUnetHTA 21 - Individual Practical Guideline Document

D4.6 VALIDITY OF CLINICAL STUDIES

Version 1.0, 16.12.2022  
Template version 1.0, 03/03/2022

To conclude, in itself, RWD does not define a type of clinical study design and RWE can be produced with varying certainty of results for a given research question. Therefore, the certainty of results that is produced, especially the level of internal validity, is mainly determined by the study design of a given clinical study based on the use of RWD. Especially because most clinical studies using RWD are currently not RCTs, controlling for confounding bias is one of the main issues when estimating treatment effectiveness. Indeed, the lack of randomisation requires the proper use of methods to control for confounding bias (see Section 4.2), which rely on assumptions (e.g., the assumption of exhaustivity on confounders and effect modifiers) that are, in part, unverifiable.

#### Practical Guideline (Requirement for JCA reporting)

RWD is not a design *per se*; thus, the design of a clinical study should be described and classified according to the principles already described in this guideline.

RoB should be assessed according to the principles already described in this guideline.

#### *Specific points of attentions*

For a given clinical study, it should be reported if RWD are the sole source of data, or a primary source of data complemented by a secondary source specifically collected for research purposes (and, if so, to which specific design it corresponds).

Given the at least partial use of data that were not initially structured for clinical research, the validity and reliability of RWD for adequately answering a given research question is of particular importance, especially the potential use of proxy variables, the risk of attrition bias, and the adequate measurement of endpoints.

Horizon Scanning to anticipate need for PLEG  
Rx/indications, types (e.g. gene Txs) conditions?

0

Early and iterative dialogues/scientific advice/joint scientific consultations

1

Identify the decision-relevant uncertainties (real-life effectiveness, sub-populations, etc) and judge whether they can be resolved by patient relevant outcomes collected in clinical practice

2

Link data collection to pricing and reimbursement agreement, and assess feasibility to collect the data required within a reasonable timeframe

3

Collaborate across jurisdictions, with EMA and stakeholders  
And publish data collection plans



# Effective RWD collection post-launch

RWE4Decisions 2021 updated during 2023

4

Monitoring processes to ensure onboarding of centres, inclusion of appropriate patients, quality of data collection

5

Investment in data collection infrastructure (national monitoring system, registries etc)

6

Reports published in an easily accessible place that show learnings from accumulated data

# Effective RWD collection post-launch

RWE4Decisions 2021 updated during 2023

4

Monitoring processes to ensure onboarding of centres, inclusion of appropriate patients, quality of data collection

5

Investment in data collection infrastructure (national monitoring system, registries etc)

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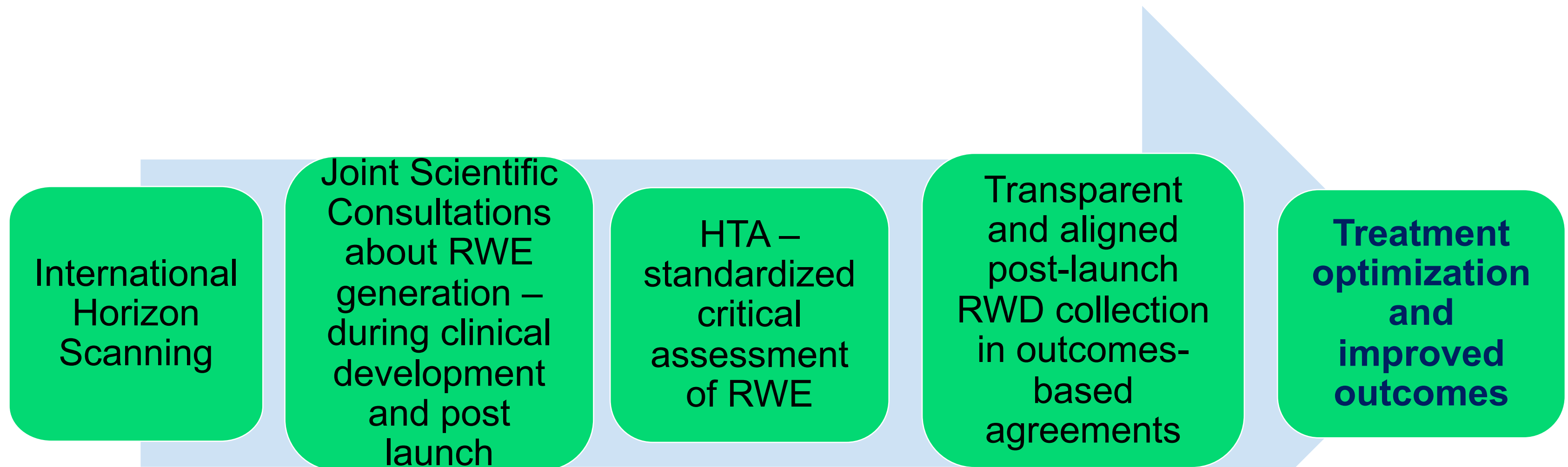
Reports published in an easily accessible place that show learnings from accumulated data

7

Align data collection plans, learn from other jurisdictions



A purposeful approach to RWE generation over the life cycle of high cost, innovative medicines in areas of high unmet need, where data can be collected that demonstrate patient benefit



**Learning and Sustainable Health System**

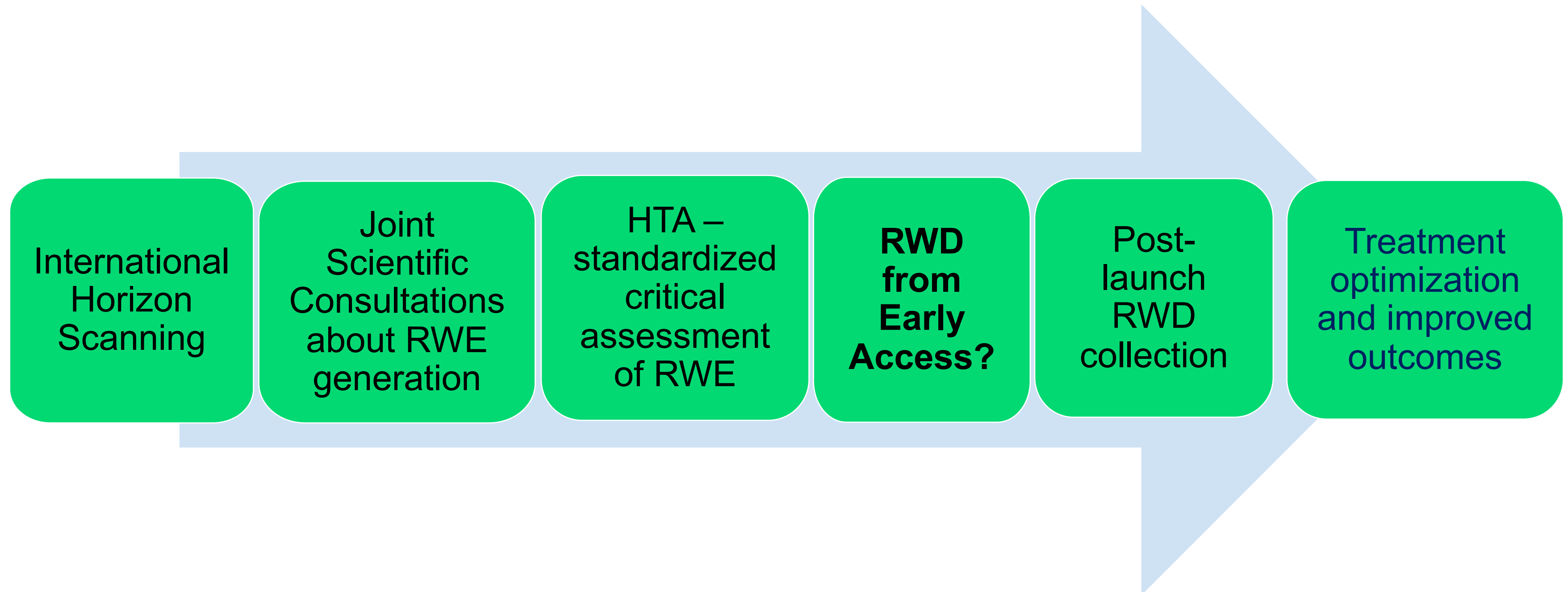


# The Potential for Collecting Real- World Data in Early Access to Inform HTA/Payer Decisions





# Covering the entire life cycle of RWE generation Early Access?



# The Potential for Collecting Real- World Data in Early Access to Inform HTA/Payer Decisions



**Entela Xoxi**

Senior Researcher, Università  
Cattolica del Sacro Cuore Roma



# Review of Early Access schemes in relation to HTA

**Entela Xoxi**

PharmD, PhD, MSci

Lecturer with Collaboration Agreement for Research Projects

UNIVERSITÀ CATTOLICA del Sacro Cuore Rome - ALTEMS

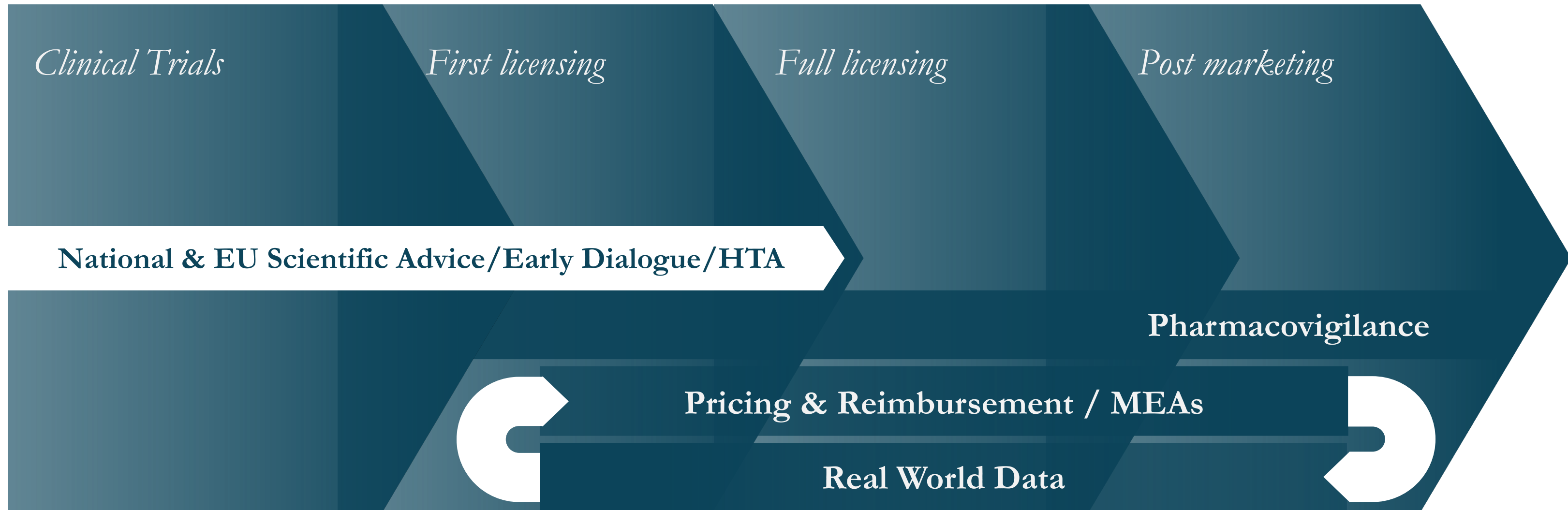




## Purposes of Early Access Schemes (EAS)

- To provide access to treatment options in advance of the standard codified pathway for patients with a high unmet therapeutic need, options that are presumed to have a clinically significant impact on patients.
- EAS offer a potential advantage not only for patients, but also for Health Technology Assessment for the purposes of decisions on price, reimbursement and other access conditions, for healthcare system and the pharmaceutical industry.
- The EAS do not exclude evaluation by regulatory bodies and/or HTAs and payers. Indeed, these schemes, in addition to offering early access to patients, create an **opportunity to acquire new data** and, possibly, evidence (to complement pivotal clinical trials).
  - Some EAS are in fact associated with data collection programs (real-world) and acquisition of Real-World-Evidence (RWE) in the period between phase II-III and MA, extended in in some cases to the period up to the P&R decision, further supporting the product value proposition.

# Progressive authorisation lifecycle





# Definitions

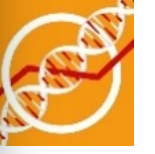


01  
REGULATORY

02  
NATIONAL  
HTA/ PAYER

03  
CHALLENGES FOR RWD





*Provisions to foster patients' early access to new medicines that address public health needs and are eligible for the centralised procedure such as:*

- Compassionate use program (CUP) or Expanded Access Program (EAP)
  - *Named-patient based compassionate use*
- Accelerate assessment (AA)
  - *PRIME scheme*
- Conditional Marketing Authorisation (CMA)
  - *Exceptional circumstances*



## CUP

<b>Type of mechanism</b>	Regulatory tool for early access
<b>Medicines eligible</b>	<p>Unauthorised <u>medicinal products</u>:</p> <ul style="list-style-type: none"> <li>• for chronically, seriously debilitating or life threatening diseases, with no satisfactory treatment authorised in the EU;</li> <li>• targeted at a group of patients rather than an individual;</li> <li>• undergoing centralised marketing-authorisation applications or <u>clinical trials</u>;</li> <li>• falling under the mandatory or optional scope of <u>centralised procedure</u>.</li> </ul>
<b>When to apply</b>	CHMP opinion on <u>compassionate use</u> cannot be requested by applicants, they should liaise with <u>national competent authorities</u>
<b>Key features</b>	<ul style="list-style-type: none"> <li>• Benefits seriously ill patients who cannot be treated satisfactorily or cannot enrol in ongoing <u>clinical trials</u></li> <li>• <u>CHMP</u> recommendations to Member State to harmonise the conditions of use, distribution and the target population</li> </ul>

In general, medicines that are not yet authorised are first made available through clinical trials and patients should always be considered for inclusion in trials **before** being offered CUP.

## SOMMARIO

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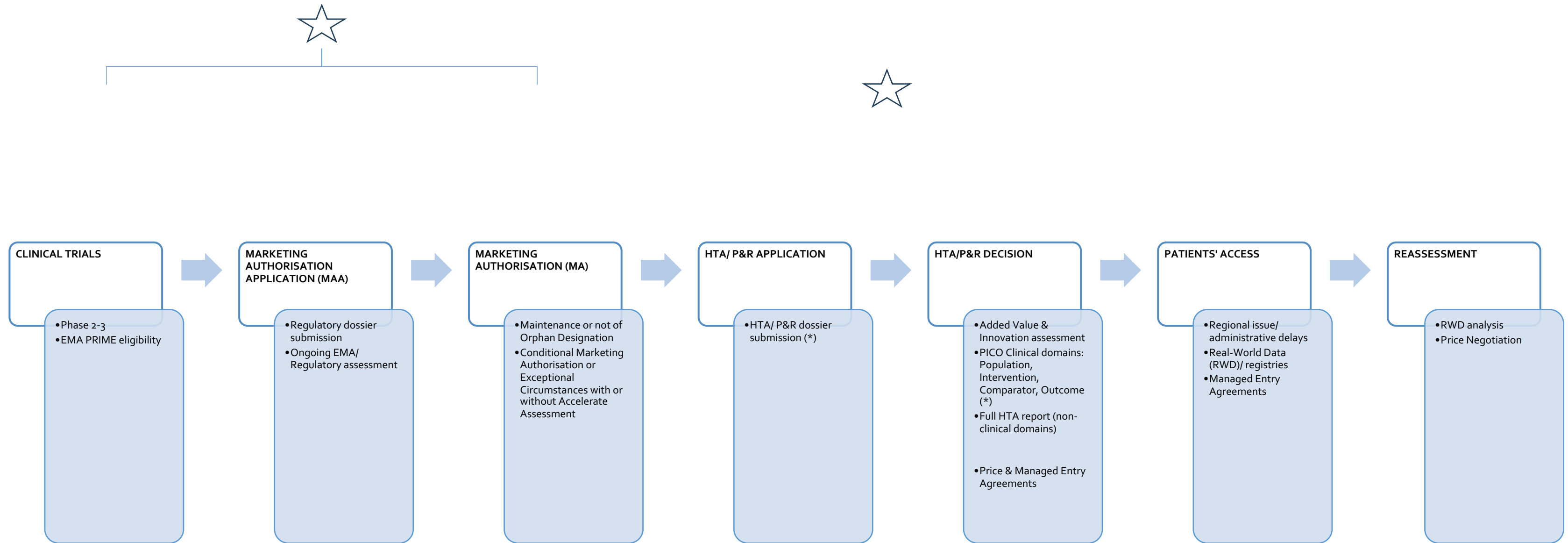
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Early Access Schemes: an international framework, literature evidence and the French case

- Countries with EAS financed by the public health system (Belgium, France, Italy, Greece, Netherlands, Spain)
- Countries with only CUP, or schemes not financed by the public healthcare system (Austria, Denmark, Germany, UK)



# Possible Early Access Schemes



Early access scheme



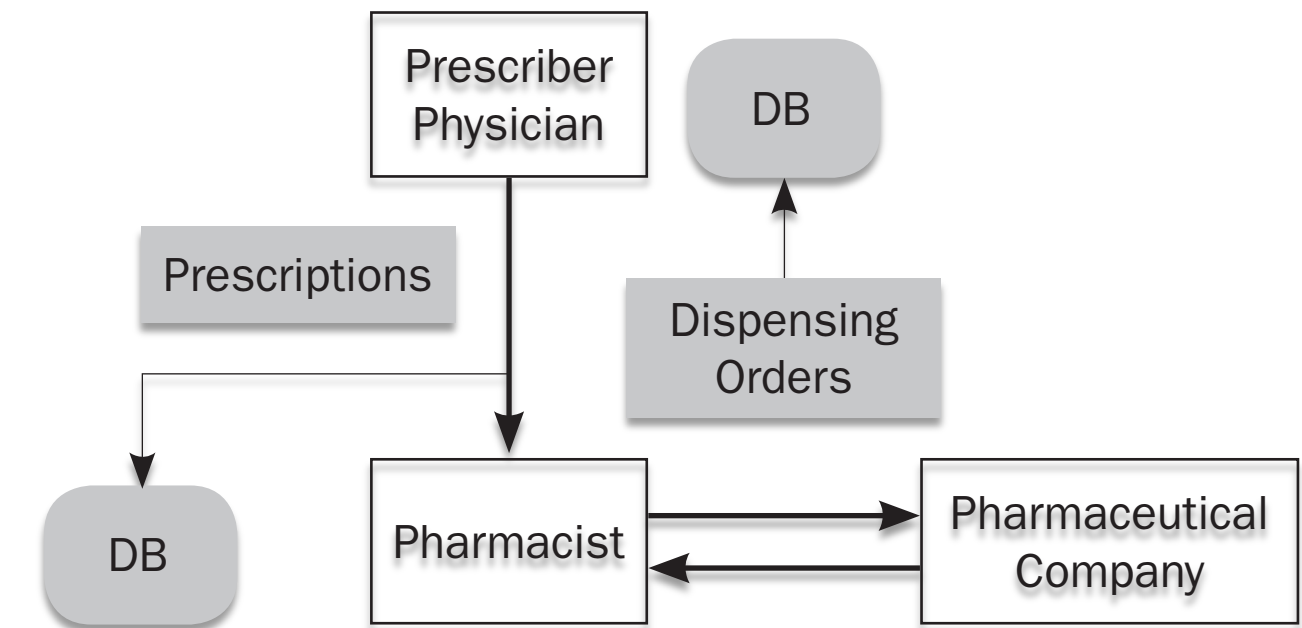
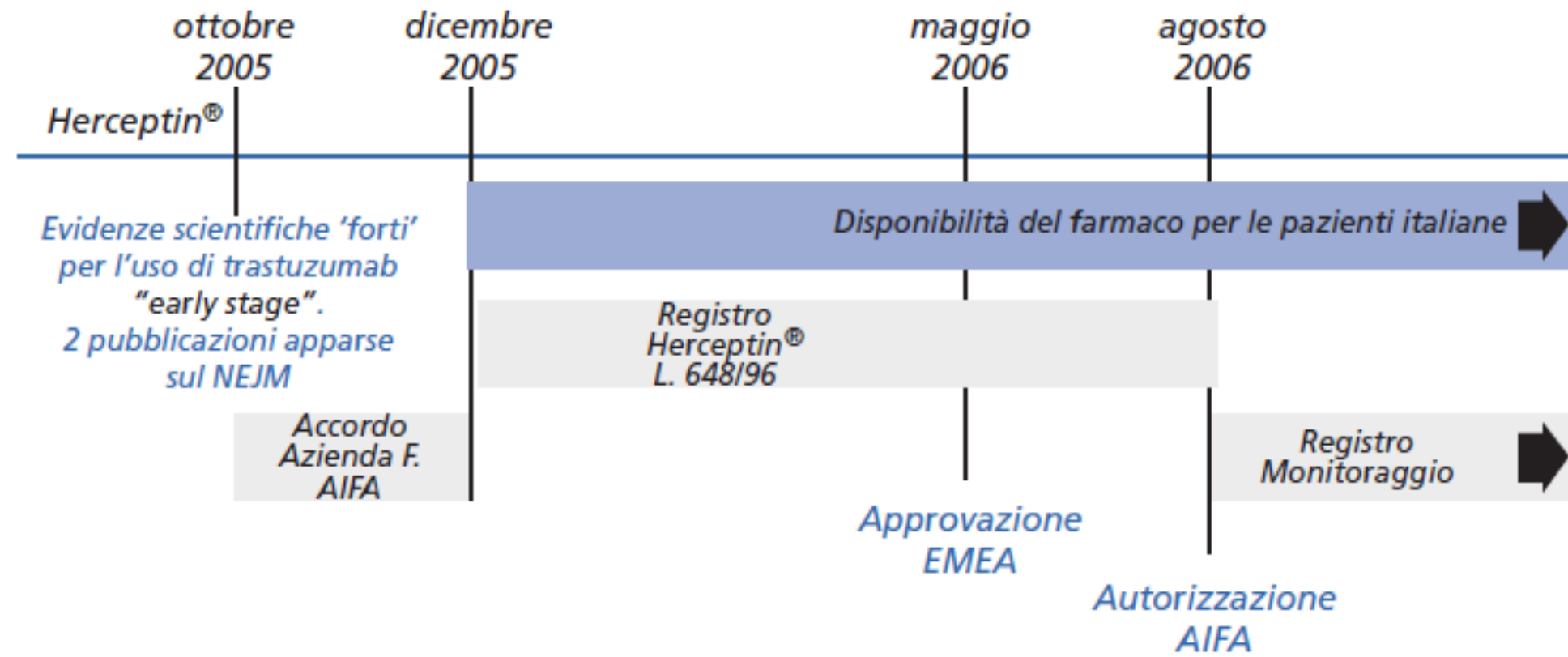
## Early access in Italy

Requirements	648/1996 Law <sup>2</sup> (Early access + off-label)	326/2003 Law (National 5% AIFA Fund)	07 Sept. 2017 Ministerial Decree (Compassionate use)	94/1998 Law (former Di Bella Law – off label)
Lack of treatment alternatives	YES	Not detailed	YES	YES
Informed consent	YES	Not detailed	YES	YES
Scientific evidence	Positive results form Ph.2 studies	Rare diseases Not detailed	Positive results form Ph.3 studies, or Ph.2 for life threatening conditions <sup>1</sup>	Positive results form Ph.2 studies
Authorisation	AIFA	AIFA	Ethic Committees Notification to AIFA	Ad-hoc hospital Commission
Medical liability	YES	Not detailed	YES	YES
Monitoring and data transmission	Clinical & economic monitoring	Not detailed	Limited to safety	Not detailed
Payer	NHS	AIFA	Free supply by Pharma Company	Patient, or NHS in case of hospitalisation

1. In the case of rare diseases or rare tumors, at least Phase I clinical trials, already concluded, that have documented the activity and safety of the medicine (not applicable to ATMPs)

2. Pricing negotiation (AIFA GL 2020)

# AIFA registries tool started with an early access



# Possible Early Access Schemes and RWD



- CUP (Industry)
- National Early Access Tools with RWD (HTA/Payers)
  - 7 AIFA registries 648/96 Law
  - 1 AIFA registry 5% Fund

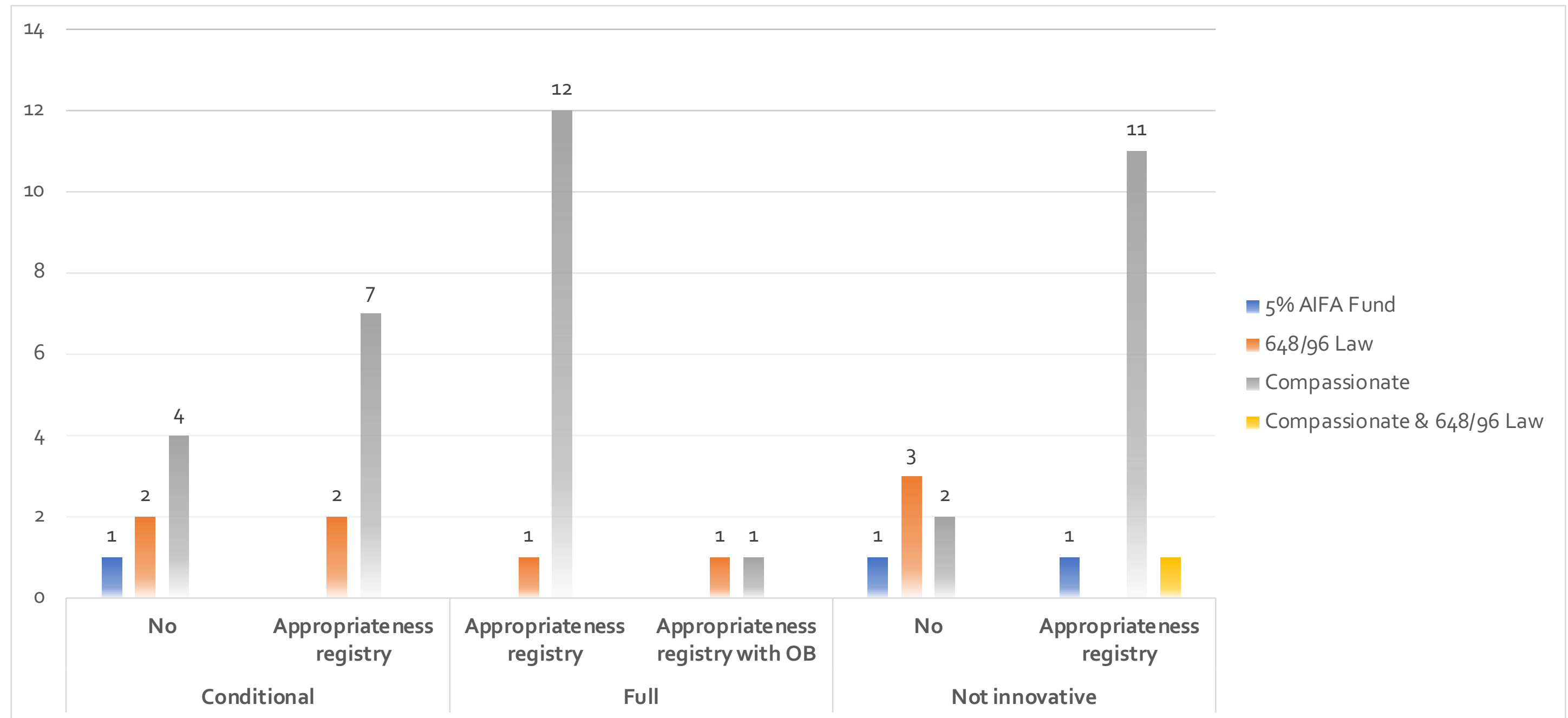
Regional/  
Hospital



Early access scheme



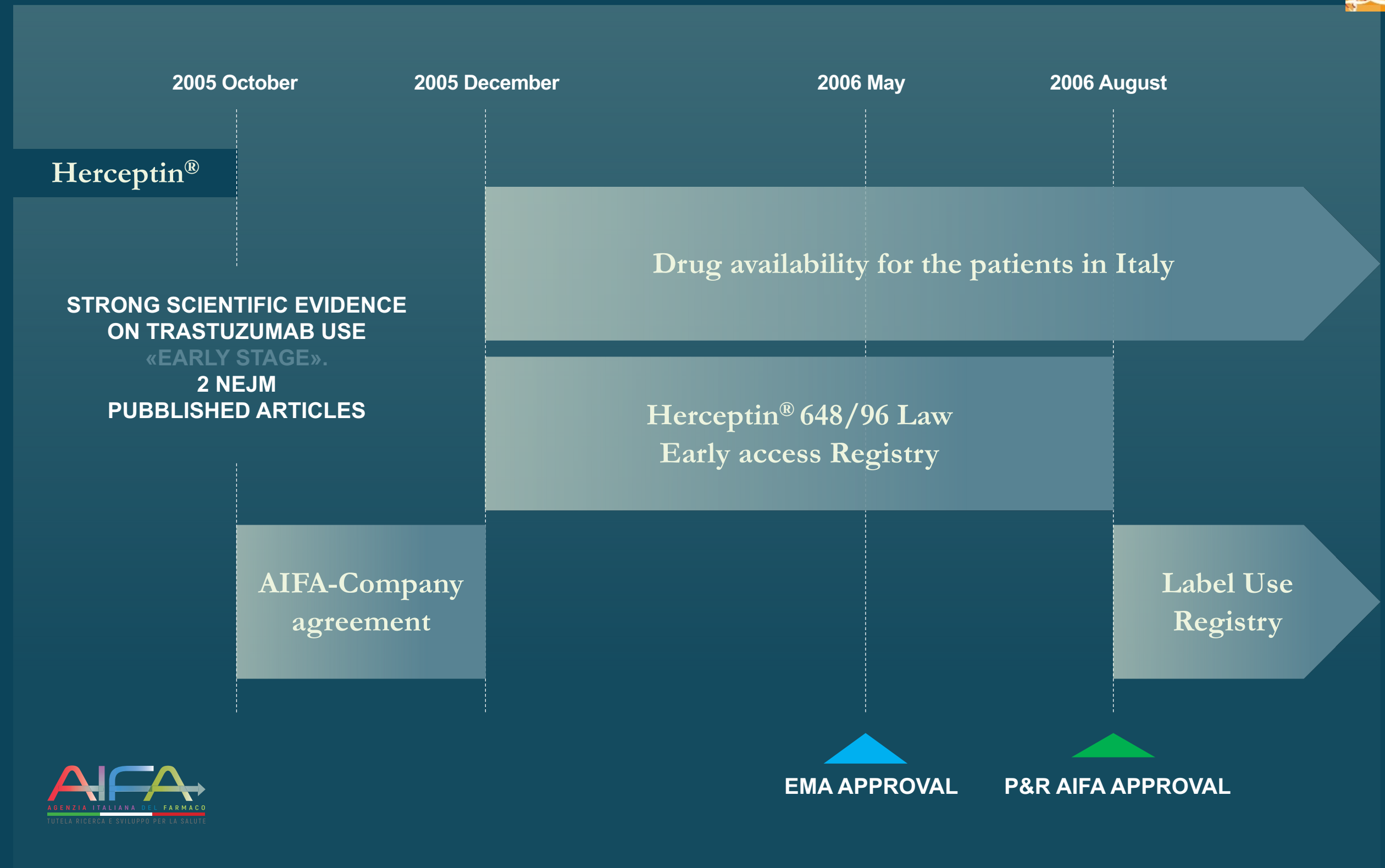
# Impact of recognition of innovation and registries for those drugs with an Early access



# Case 1

## Registry Trastuzumab in Metastatic Breast Cancer

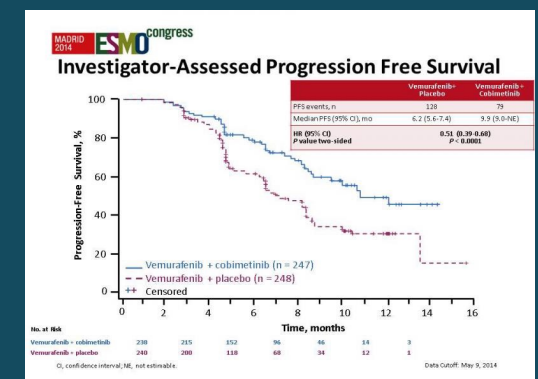
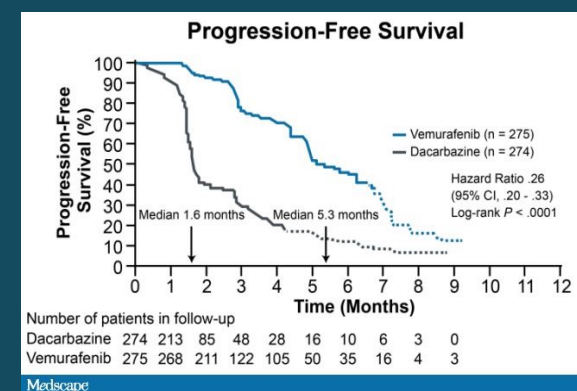
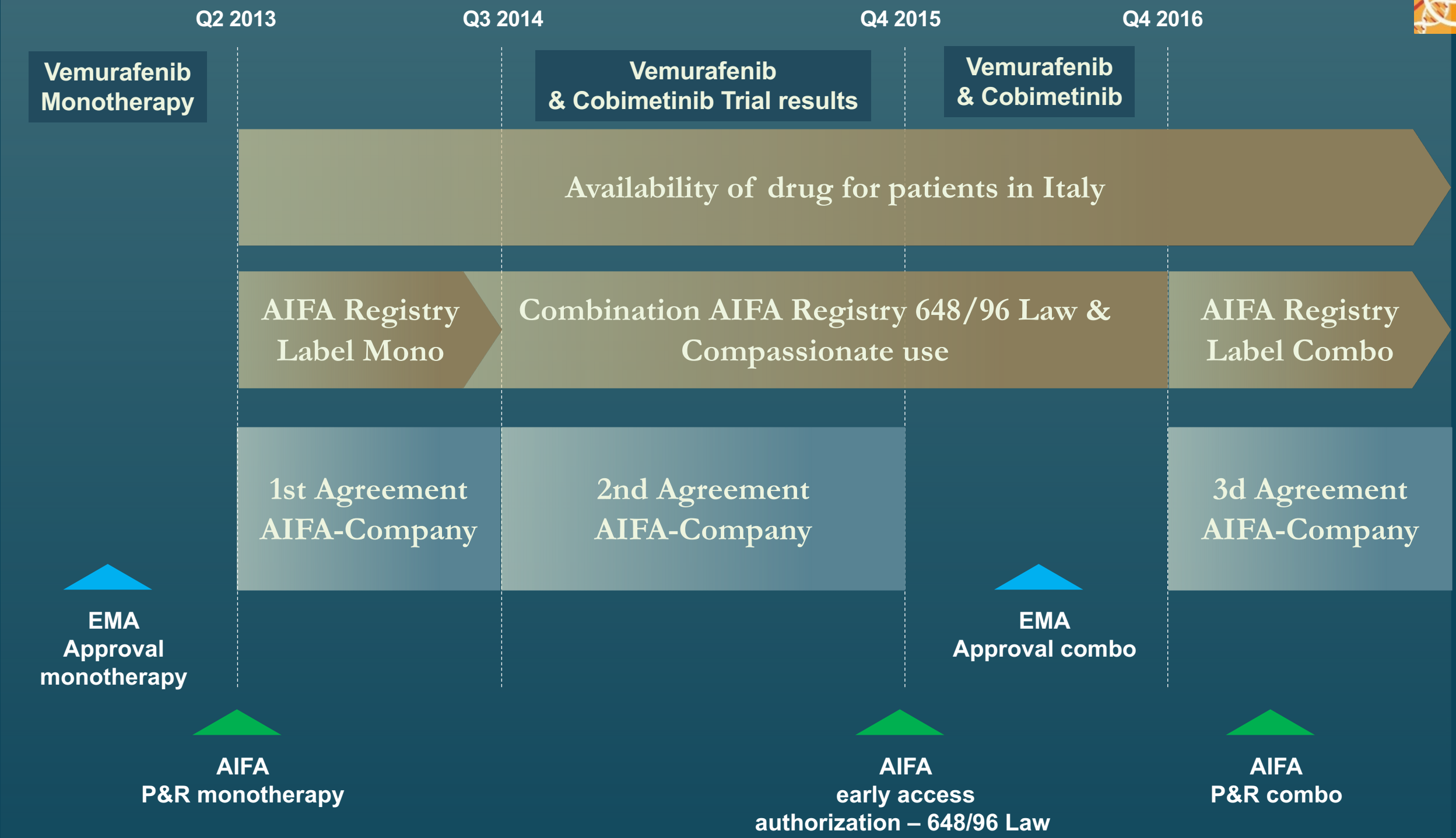
- Early access reimbursed by NHS and mandatory data collection by AIFA Registry
- Dynamism moving from an early access to Patient Access



# Case 2

## Registry BRAF & MEK inhibitor combination

Adaptive Performance-based risk sharing agreements including an early access scheme for the combination therapy





Thank you

[entela.xoxi@unicatt.it](mailto:entela.xoxi@unicatt.it)



# The Potential for Collecting Real- World Data in Early Access to Inform HTA/Payer Decisions



**Camille Thomassin**

Head of the Real-World  
Evidence Coordination Unit,  
Haute Autorité de Santé (HAS)



# Early access to medicinal products in France: HTA perspective

*Potential for collecting RWD in Early Access to inform HTA/Payer decisions*

RWE4Decisions Symposium – 23rd November 2023

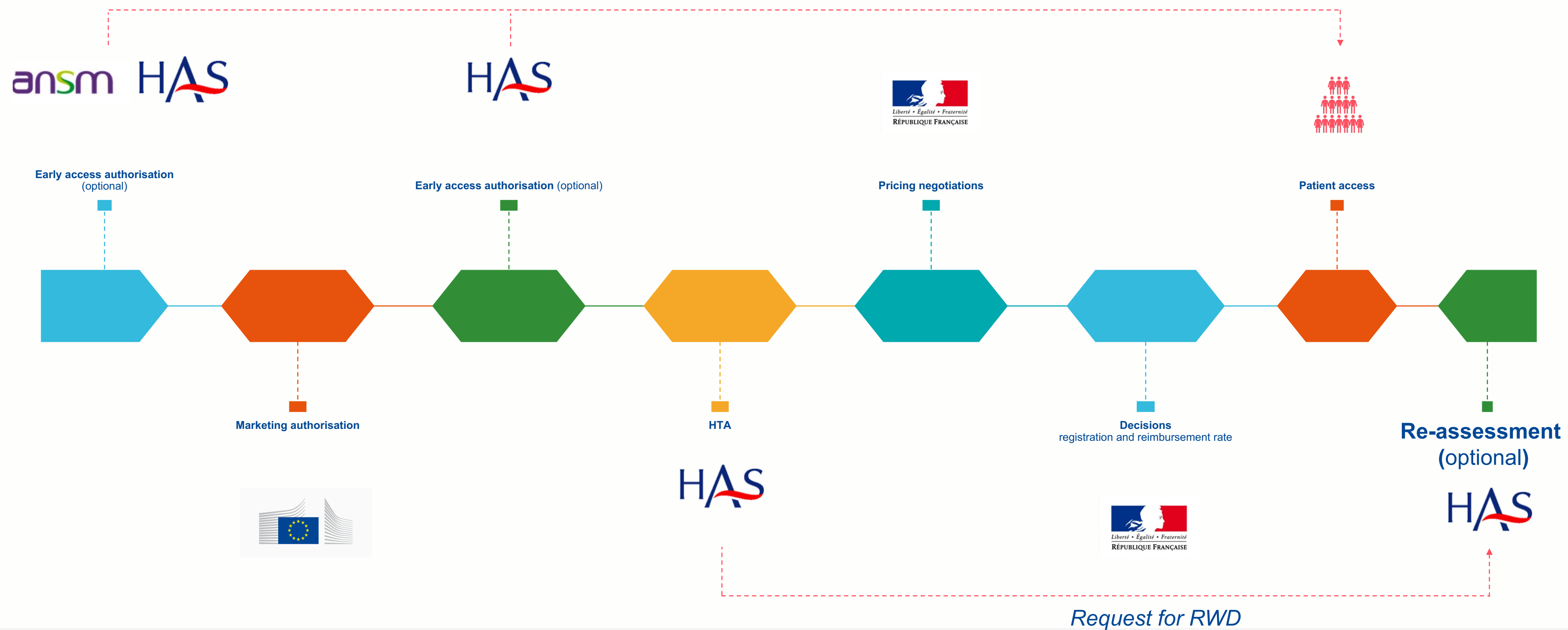


Camille Thomassin, Head of the real-world evidence coordination unit,  
*HTA department, French National Authority for Health*

# Disclosures of Interests

No affiliations. I'm employed by the French National Authority for Health .

# Market access pathway in France – *medicinal products*





# Focus on early access – *medicinal products*

Authorisation procedure for early access reformed in July 2021.

Allow access and coverage before final decision on reimbursement.

- Can be granted by HAS before MA (MA must be submitted within 2 years) or after MA
- Fast track process : 90 days maximum
- HAS = decision making body

5 eligibility criteria:

- Acceptable preliminary benefit risk ratio
- Serious, rare or debilitating disease
- Responding to unmet need (no treatment or only unsatisfactory treatment available)
- Access to treatment cannot be delayed
- Assumed innovative, notably compared to current standard of care



HAS



More  
information  
[here](#) and [here](#)

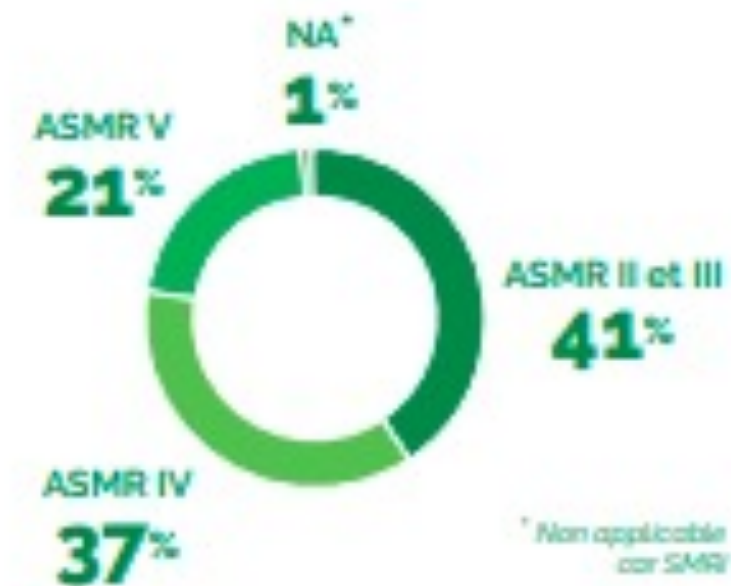
# 2-year review of EAPs in France

- **98** positive EA initial decisions (oncology is the main therapeutic area).
- **86/98** already evaluated for routine reimbursement (*with at least a minor therapeutic progress recognized for 78% of the dossiers => direct impact on price negotiations*).
- Average time between EAA and inscription on the list(s) for routine reimbursement is 9 months.

[Haute Autorité de Santé - Accès précoce des médicaments : un bilan positif après deux ans de mise en place du dispositif \(has-sante.fr\)](https://www.has-sante.fr)

## Accès précoce des médicaments : un bilan positif après deux ans de mise en place du dispositif

ÉTUDES ET RAPPORTS - Mis en ligne le 23 oct. 2023



ASMR V = no clinical added value

# Requirements on real world data arising from early access

- Mandatory real world data collection for each patient, defined by HAS (+/- ANSM):

Minimum data set with Patient characteristics, Conditions of use; Efficacy, including impact on quality of life/ symptoms/disability using a patient reported outcome measure (PROM), Safety.

- The format of the data to be collected is standardized in the Protocol for temporary use and data collection (PUT-RD).
- Data collected under care routine conditions. Not intended to replace clinical trials.
- Pharma companies are legally responsible for data collection and support the associated costs. Financial compensation for data collection are given to the hospitals (based on a signed agreement).
- Data collection provide input for the assessment of the medicinal product by the HAS for early access authorisation renewal and, eventually, for the assessment for reimbursement (including re-assessment if applicable).

## Modèle de protocole d'utilisation thérapeutique et de recueil de données (PUT-RD)

Accès précoce Choisissez un élément. – Nom du médicament (DCI)

La proposition de PUT-RD soumise par le laboratoire doit être rédigée en français selon ce modèle et transmise en pièce jointe lors de la soumission de la demande d'accès précoce sur la plateforme SF-SAME. Il est impératif que le modèle de PUT-RD tel que publié par la HAS soit respecté, en particulier les zones identifiées comme non modifiables.

L'ensemble des éléments proposés sont susceptibles d'être modifiés par la Haute Autorité de santé (HAS) et l'Agence nationale de sécurité du médicament et des produits de santé (ANSM) le cas échéant. Le PUT-RD final sera annexé à la décision de la HAS. Se référer au [guide de dépôt](#) pour plus d'information sur les recommandations de la HAS et de l'ANSM sur ce document.

Cette proposition de PUT-RD est susceptible d'être adressée aux associations de patients et autres parties prenantes en vue de recueillir leur contribution pendant l'instruction conformément à l'article R. 5121-69-1.

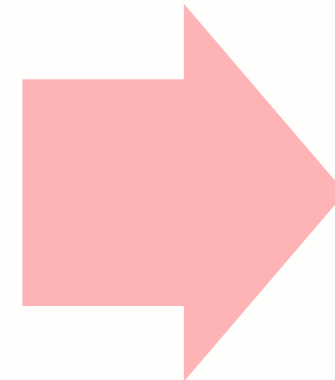
Toutes les mentions en police de couleur orange sont des aides au remplissage du modèle, et doivent être supprimées avant transmission du document sur Sésame.

La demande	
Spécialité	Renseigner le nom de spécialité si déjà déterminé
DCI	Si la DCI n'est pas disponible, renseigner la dénomination provisoire du médicament
Indication	Indication simplifiée revendiquée
Date d'octroi	XX/XX/XXXX La mise à disposition de ce médicament sera effective dans un délai maximal de 2 mois à compter de cette date.
Périodicité des rapports de synthèse	9 mois – un gel de la base jusqu'à un mois avant cette échéance est toléré. Le prochain rapport de synthèse devra également être déposé dans le dossier de renouvellement d'accès précoce. Pour chaque renouvellement ultérieur, le rapport de synthèse déposé devra être le plus récent possible, en tenant compte du dépôt du dossier 3 mois avant

# Integration of patients' perspective

Almost 80% of approved PUT-RD include a PROM (pre-authorization EAA).

**Patients association involvement** for the choice of the PROM, if necessary



**Example of PROMs frequently used in EAPs:**

- specific questionnaires: EORTC-QLQ-C30 in oncology, DLQI in dermatology, ...
- generic questionnaires: SF-12, SF-36, PedsQL, ...



# How to optimize the data for their use in assessment?

**Early « enough » access**, so that data are available in the dossiers for the first assessment for reimbursement (or for a timely re-assessment)

**Simplification of data collection** for clinicians, pharmacists, and patients

**Use of existing data sources, e.g. registries** (see current work of HAS to enhance data discoverability)

**Data quality and exhaustivity**

**Adapted methodology** for the analysis of the data

**Patients association involvement** for the choice of the PROM

**Clinician's expertise for drafting the data collection**

Relevant RWD  
for HTA use

**Re-use of data for research purposes**, in the context of post-authorisation studies (linkage with other databases or use for comparison vs an external control)

# Back-up slides

# A unique cooperation for EA in rare diseases in France

- Collaboration between the French National Registry for Rare Diseases (BNDMR), HAS, ANSM (regulator) and French Ministry of Health.
- The BNDMR warehouse gathers data collected through the app BaMaRa, in the format of a Minimal Data Set for rare disease, already used by healthcare professionals.
- In 2023, development of an additional Minimal Data Set to capture data on efficacy of the treatments (**Treatment - Minimal Data Set**) that can **be used for data collection in EA**.
- **A dedicated template of PUT-RD published by HAS in July 2023 for EA in RD ([here](#)).**
- Improves predictability for manufacturers in terms of the format of data requested and optimizes data collection. Enhance the re-use of data for research purposes.
- **The systematic involvement of rare disease networks reinforce the relevance of the data collected.**

First EAs with BaMaRa data  
collection coming soon...

Thank you for your attention!

Find all our work on

[www.has-sante.fr](http://www.has-sante.fr)





# The Potential for Collecting Real-World Data in Early Access to Inform HTA/Payer Decisions



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Xoxi**

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**Andre Vidal  
Pinheiro**

Vice-President, Head of  
Patient Value & Access  
EUCAN, Global Pricing &  
Access, Takeda



# Closing Session: Building Better RWE for Decisions – What's Next?





# Keynote address from INAMI-RIZIV



## Pedro Facon

Deputy CEO, National Institute of Health and Disability Insurance, Belgium (INAMI-RIZIV)

# Looking ahead to the Belgian EU Presidency

# Closing Session: Building Better RWE for Decisions – What's Next?



**Niklas  
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Chief Pharmacist, Swedish  
Dental and Pharmaceuticals  
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**Matti  
Aapro MD**

Oncologist, Genolier  
Cancer Center



**Simone  
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Public Affairs Director,  
EURORDIS-Rare Diseases  
Europe



**Anna  
Filonenko**

Director, Real-World  
Evidence Scientist, Rare  
Disease, Pfizer



# Closing remarks

# Looking ahead to 2024 – the RWE4Decisions agenda



## **Hans-Georg Eichler**

Consulting Physician,  
Association of Austrian Social  
Insurance Institutions





# Thank you for your contributions!



**Lunch  
will  
follow**

The recording will be available on our website  
**[www.rwe4decisions.com](http://www.rwe4decisions.com)**

Stay in touch on  
**[secretariat@rwe4decisions.com](mailto:secretariat@rwe4decisions.com)**  
and keep up to date on social media

**See you in  
November 2024!**