

From Policy to Practice:

EHDS Implementation to Support Better Real-World Evidence for HTA/Payers

9 April 2025

15:00 - 16:30 CEST

on Zoom

RWE4Decisions

WHO WE ARE

HTA/Payer-led multistakeholder learning network

OUR PRINCIPLES



Transparency



Collaboration

OUR WORK

CHALLENGE

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

LEADING QUESTIONS

- How fit-for-purpose Real-World Evidence (RWE) can be generated over the life cycle of highly innovative medicines to inform HTA/Payer decisions?
- Can requirements be aligned across stakeholders and health jurisdictions/Payers?

RWE4Decisions 2025 STEERING GROUP

HTA bodies / Payers

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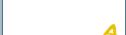
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Karen Facey, François Meyer, Senior Adviser Special Adviser (HTA) (HTA)







Secretariat provided by FIPRA funded by EUCOPE and member companies

RWE4Decisions contribution to the EHDS

Calling for a robust EHDS framework (2020-2022)

2020 - Announcement of the European Data Strategy, including the EHDS



Call for a **RWE Learning Network** within the EHDS

2022 - EHDS proposal



Call to include

RWE and HTA/Payer

considerations in the

EHDS



Stakeholder Statement (2025)



RWE4Decisions

A multi-stakeholder learning network that supports open dialogues to determine how fit-for-purpose RWE can be generated over the life cycle of highly innovative medicines and inform HTA/Payer decisions:

- Systems to identify medicines most likely to need RWE and anticipate RWE generation (early planning).
- Clarifying how RWE should be generated by Health Technology Developers and how it will be assessed by HTA and used by Payers/decision-makers.
- Improving the execution of effective Post Launch Evidence Generation (PLEG) studies and aligning them across jurisdictions where possible.

RWE4Decisions Learning Network



Housekeeping



Today's webinar is scheduled for 1.5 hours



This meeting will be recorded and made available at rwe4decisions.com



Please **use the Q&A function** to ask a question or make a comment You can **upvote** other participant's comments



When asking a question, please **rename yourself** on Zoom to show name and affiliation

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KEYNOTE

NATIONAL IMPLEMENTATION

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EHDS – Secondary uses of data

David Asturiol Policy officer on the EHDS

European Comission
DG for Health and Food Safety
Unit C1 – Digital Health



EHDS in a Nutshell – what is it about?



Primary use = use of data for the delivery of healthcare

Improving patients' access to their health data; Ensuring seamless exchanges for continuity of healthcare.



Secondary use = use of data for research and public interest purposes

Making data available for research, policy-making etc. in a safe and secure way.



Requirements for electronic health record (EHR) systems

Creating a single market for electronic health records systems, supporting both primary and secondary use.





EHDS in a Nutshell – Secondary Use

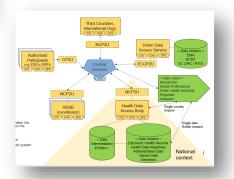
Art 2(1t) & Art 50

Art 51

Data User

- Common European rules on:
 - Who has to make data available,
 - Which data have to be made available,
 - For which purposes, ————— Art 53&54
- Establishes obligations for:
 - Health Data Access Bodies,
 - Data holders,
 - Data users
- Establishes an EU infrastructure to share data
 - HealthData@EU

Making (more) data available for research, policy-making etc. in a safe and secure way





Cross-border secondary use infrastructure

HealthData@EU



Central support services provided by EC



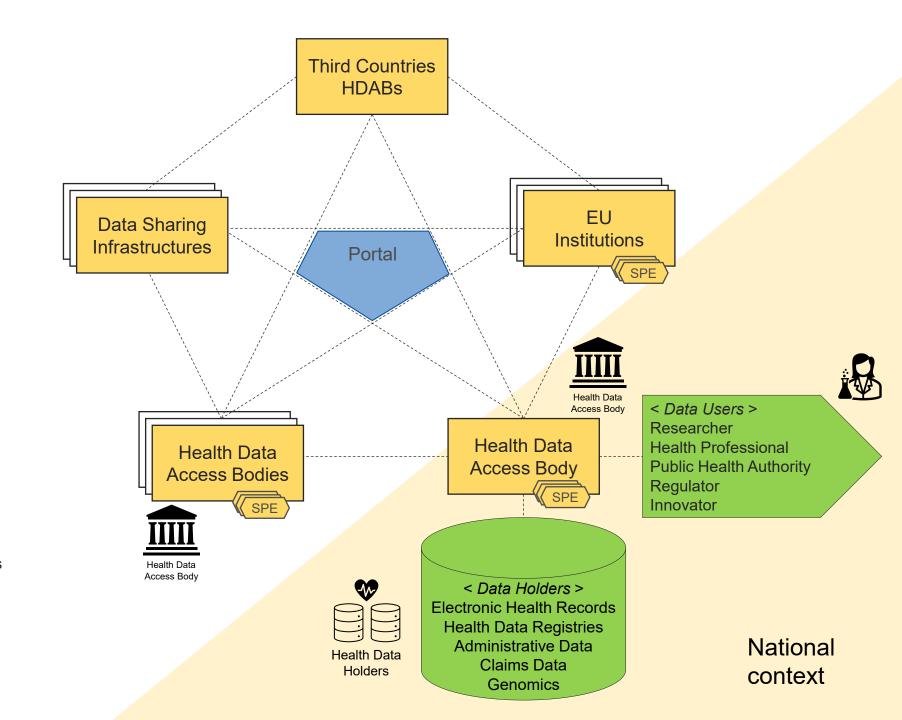
National data management services provided by authorised participants



Secure Processing Environments



Local services provided by/to local partners





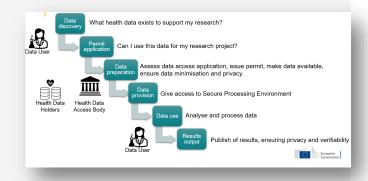
EHDS in a Nutshell – Secondary Use

Common European rules on:

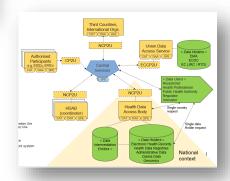
- Who has to make data available,
- Which data have to be made available,
- For which purposes,
- Under which conditions

Establishes obligations for:

- Health Data Access bodies,
- Data holders,
- Data users
- Establishes an EU infrastructure to share data
 - HealthData@EU
- Common procedure to access data

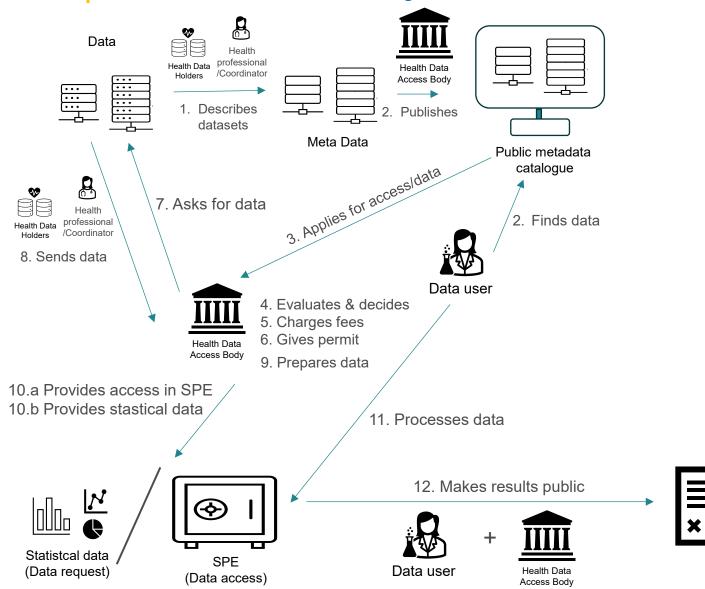


Making (more) data available for research, policy-making etc. in a safe and secure way





User Journey EHDS



Main Duties







- Describe datasets (DQUL)
- Provide datasets to HDAB
- Receive fees





- Find datasets
- Submit applications
- Pay fees
- Process data according to EHDS
- Make results public



Health Data Access Body

- Publish metadata records
- Evaluate and take decisions on access
- Charge fees
- Give permit
- Ask data to data holders
- Prepare data (e.g. link, anonymise)
- Place data in SPE (no opted-out)
- Provide access to data
- Monitor processing in SPE
- Make process transparent (e.g. Publish application, permit, results)



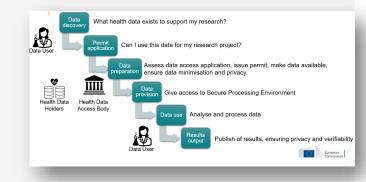
EHDS in a Nutshell – Secondary Use

Common European rules on:

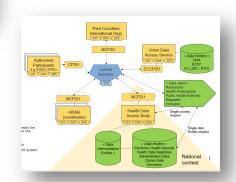
- Who has to make data available,
- Which data have to be made available,
- For which purposes,
- Under which conditions

Establishes obligations for:

- Health Data Access bodies,
- Data holders,
- Data users
- Establishes an EU infrastructure to share data
 - HealthData@EU
- Common procedure to access data
- Streamlined process & safeguards for privacy of data subjects:
 - Data access application evaluation permit process,
 - Anonymisation/pseudonymisation of data,
 - SPE,
 - Opt-out

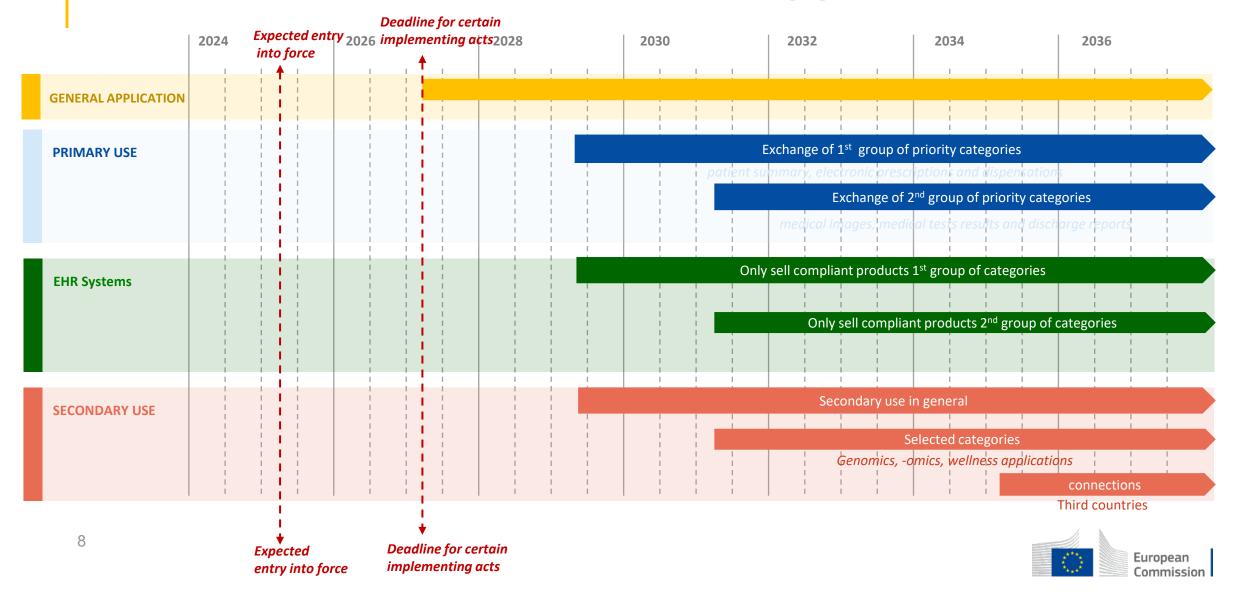


Making (more) data available for research, policy-making etc. in a safe and secure way





EHDS – Overall timeline for application



Thank you



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EHDS in a Nutshell – Secondary Use

Common European rules on:

- Who has to make data available,
- Which data have to be made available,
- For which purposes,
- Under which conditions

Making (more) data available for research, policy-making etc. in a safe and secure way



Making decisions detrimental to individuals or groups based on electronic health data, qualifying as decisions if they have legal, social, or economic impacts.

- Making employment-related decisions or offering less favorable terms in goods or services based on health data, including discriminatory decisions affecting insurance, credit, or loans.
- Conducting advertising or marketing activities.
- Developing products or services that could harm individuals, public health, or society, including illegal drugs, alcohol, tobacco, weaponry, or addictive products.
- Engaging in activities that conflict with ethical standards set by national law.

- Public interest in the area of public and occupational health, such as activities for protection against serious cross-border threats to health and public health surveillance or activities ensuring high levels of quality and safety of healthcare, including patient safety, and of medicinal products or medical devices;
- **Policy making and regulatory activities** to support public sector bodies or Union institutions, agencies and bodies, including regulatory authorities, in the health or care sector to carry out their tasks defined in their mandates;
- **Statistics**, such as national, multi-national and Union level official statistics defined in Regulation (EU) No 223/2009 related to health or care sectors;

Reserved for public sector bodies and Union institutions, offices,

- education or teaching activities in health or care sectors at the level of vocational or higher;
- scientific research related to health or care sectors, contributing to public health or health technology assessment, or ensuring high levels of quality and safety of health care, of medicinal products or of medical devices, with the aim of benefitting the end-users including: development and innovation activities for products or services; training, testing and evaluating of algorithms, including in medical devices, in-vitro diagnostic medical devices, Al systems and digital health application.
- improving delivery of care, treatment optimization and providing healthcare, based on the electronic health data of other natural persons.

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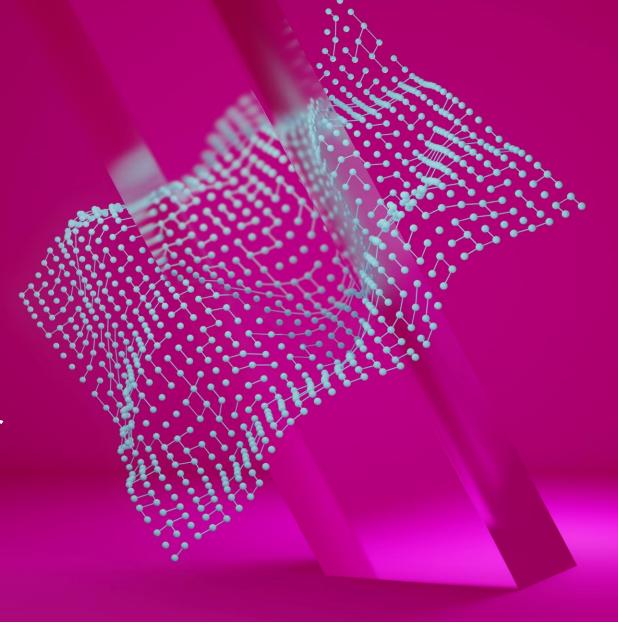
PRESENTER

MAARI PARKKINEN

Development Manager, Findata Project Manager, FinHITS

FinHITS – Towards the Future of Secondary Use of Health Data

Maari Parkkinen, Development Manager Finnish Social and Health Data Permit Authority Findata







Finland's strengths in the secondary use of health data



Personal identity code

- Key for linking personal information from various registers
- Rich national data registers with long time series
 - In practice 100% coverage of Finnish population
- "Opt-out" principle in secondary use of social and health data
 - Consent not required for registry-based research
- High trust on
 - Government and authorities, transparent operation
 - Benefits from research (as better healthcare)
 - Data security and data protection
- Legal basis
 - Act on Secondary Use of Health and Social Data

Introducing Findata – Finnish social and health data permit authority

A centralized data permit authority for secondary use of national social and health data. Founded in 2019, operation based on the national Act.

Positioned in Finnish Institute for Health and Welfare, steered by the Ministry of Social affairs and health.

Data from national registers, public and private social and health care service providers and Kanta services.

MISSION: Improve access to rich nation-wide datasets and enhance data security and the data protection of individuals.



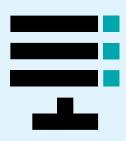
Findata's core services



Help Desk & Metadata Catalogue



Grants access to data, provides aggregated data



Collects and pre-processes data



Provides Kapseli® SPE and transfer services



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FinHITS -**Strengthening** Finnish Health Data ICT for Secondary use

Funding: EU4Health / Direct grants to Member States: for setting up services by Health Data Access Bodies - Secondary use of health data.

Budget: Approx. 2.5 million € (37) million € available in the call) Funding approx. 1,5 million € (60 %)

Duration: 1.11.2023-31.10.2027

More information: findata.fi/finhits

Objectives:

- Strengthen the Finnish infrastructure to ensure efficient and secure secondary use of health data.
- Enable Finland's smooth participation in the EHDS
- Support other member countries by bringing information about practical experiences.
- Development work based on the
 - European Health Data Space (EHDS) regulation
 - Practical experiences, feedback, and insights from national stakeholder groups and customers
 - EU projects and collaborations, including HealthData@EU Pilot, Tehdas2, Quantum, and the Community of Practice
- Main challenge: project timeline and uncertainties concerning the content of implementation acts and national implementation.

Key areas of development

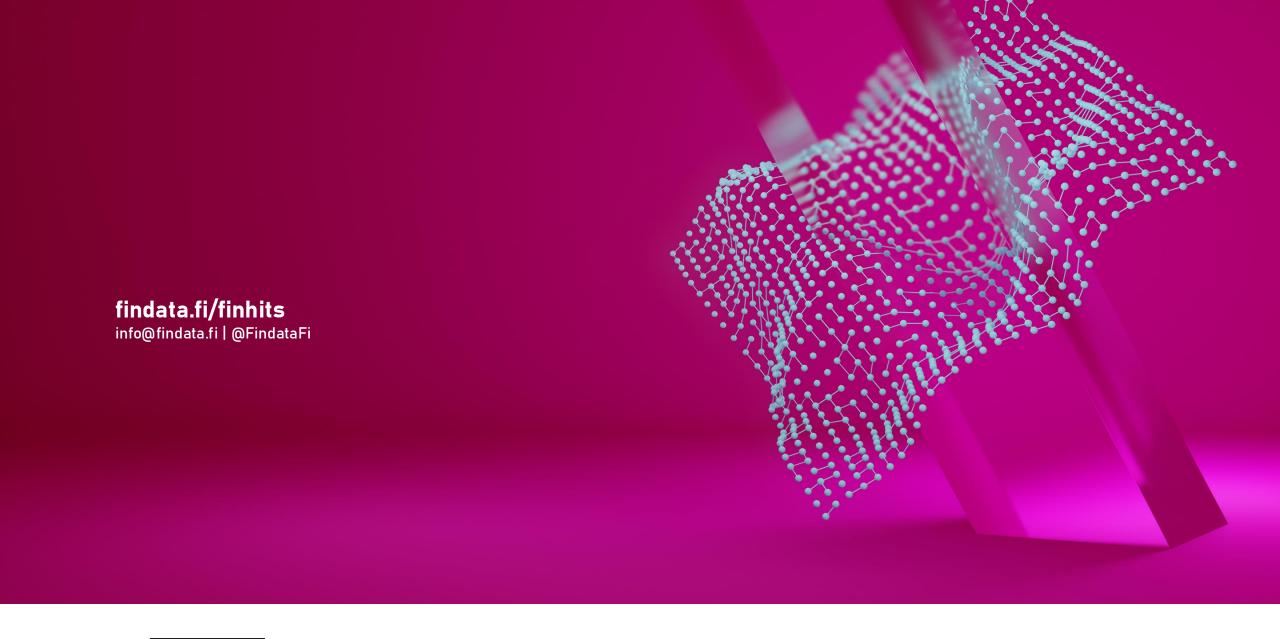
- 1. Data access application management system: Improvements in collaboration for defining needed data and information flow to support more efficient processes, fewer errors and better anticipation.
- 2. National dataset catalogue: Improve user-friendliness to enhanced discoverability and prepare for standards coming from EHDS.
- 3. Secure processing environment: Support for more advanced methods and large datasets, efficiency in verifying anonymity of results.
- 4. Cross-border gateway: Joining in the HealthData@EU infrastructure.
- **5. Data quality**: Support for data quality, data quality and utility label & two ready-made datasets.
- + Service desk: Expand the available advisory content and guidance.

Challenges and solutions

Work package	Challenges	Solutions	
WP 5 – Data Access Application Management System	 Doesn't support smooth data description or communication between different parties. Real-time information flow. 	 Data description tool connected to National Dataset Catalogue and structured data processing, collaborating with controllers. Improved portal to facilitate information flow. Reporting and templates, connection to the HealthData@EU 	
WP 6 – National Dataset Catalogue	 Does not meet the needs of growing user base and international clients. Not EHDS compliant. 	 Improving usability and addressing needs of international clients. Integration with Findata's e-service Standards for metadata descriptions, Health-DCAT 	
WP 7 - Secure Processing Environment	Does not support the growing number of users, handle very large datasets, or utilize advanced methods.	 Increasing computing power (GPU) and larger data transfers Enhanced license management. Tools for anonymisation and verification Federated analysis 	
WP 8 - Cross- border gateway	 No technical solution for the cross-border transfer of health data for secondary use. 	Connect to the HealthData@EU infrastructure to enable cross-border workflows at EU-scale.	
WP 9 – Health data quality	Tools and guidelines need to be updated for improving data quality.	 Produce guidelines and instructions (HDAB supporting data quality) Two ready-made datasets. HDAB and data quality and utility label 	

Key takeaways

- Trust: Transparent communication and guidance for all stakeholders is a must and builds trust.
- Collaboration: Efficient processes require close collaboration with ecosystem stakeholders and customers, developing digital capabilities to serve everyone involved.
- Agile operations: Learning by doing and learning fast, focus on solving problems one by one







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PRESENTER

JØRGEN SCHØLER KRISTENSEN

Chairman of the Pan-European Observatory, Health Outcomes Observatory (H2O) Former Chairman, Danish Medicines Council FROM POLICY TO PRACTICE:
EHDS IMPLEMENTATION TO SUPPORT BETTER REAL-WORLD
EVIDENCE FOR HTA/PAYERS





The Health Outcomes Observatory (H2O) project

Jørgen Schøler Kristensen

MD, D.Med.Sci

Chairman Pan European Observatory PEO Former Chairman of the Danish Medicines Council (National HTA)











How Digitally Captured Standardized Patient Voice can transform health care

Patients wish for their voice to be heard and ensure shared decision making with their HCPs. They wish avoiding unnecessary visits to the hospitals whilst maintaining high quality of diagnoses, treatment and outcomes. They are also keen to remain in control of their data.

Health Care Providers hospitals struggle to deliver to an expanding population of elderly and chose among treatment possibilities while not being able to expand the number of employees. At the same time there is high demand for research.

Health Technology Agencies and European Medicines Agency require more evidence as new more advanced medicines for ex. rare diseases enter market and there are increasing challenges on allocating limited resources.

Pharmaceutical Industry struggles to provide the evidence needed for comparing new treatments to the standard of care.





H₂0 One of the main drivers of this growth is the specific demand from the HTA authorities to see patient outcomes

HTA agencies are looking for the following:

Compound/ drug name	Disease	Outcomes in PICO (QoL measures used)	Advice
Daratumumab, carfilzomib, isatuximab	Multiple myeloma	Progression-free survivalTime to progression	Price negotiation
Ciltacabtagene autoleucel	Multiple myeloma	Cost effectiveness	Price negotiation/ pay-for- performance arrangement
Ripretinib	Colon cancer, stomach cancer	 Overall survival QoL (EQ5D, EORTC – QLQ) Adverse effects & drop-out because of AE 	Price negotiation
Daratumumab	Amyloidose	 Overall survival Organ response QoL (SF -36) Adverse effects & drop out because of AE 	Negative (flawed cost effectiveness model
Brexucabtagene- autoleucel	Acute lymphoblastic leukemia	 Overall survival Quality of life (EQ5D, EORTC – QLQ) Adverse events 	Negative after conditional reimbursement (missing QoL data)
Efanesoctocog alfa	Haemophilia A	 Annual no. of haemorrhages % of patients without haemorrhages QoL (Haem –A-QoL physical health) Adverse effects & drop out because of AE 	Positive
Risankizumab	Colitis ulcerosa	 Clinical remission Endoscopic improvement QoL (IBDQ) Adverse events & drop out because of AE 	Positive
Lisocabtagene maraleucel	Large B-cell lymphoma	 Overall survival QoL (EORTC –QLQ, FACT –lymS) 	Price negotiation

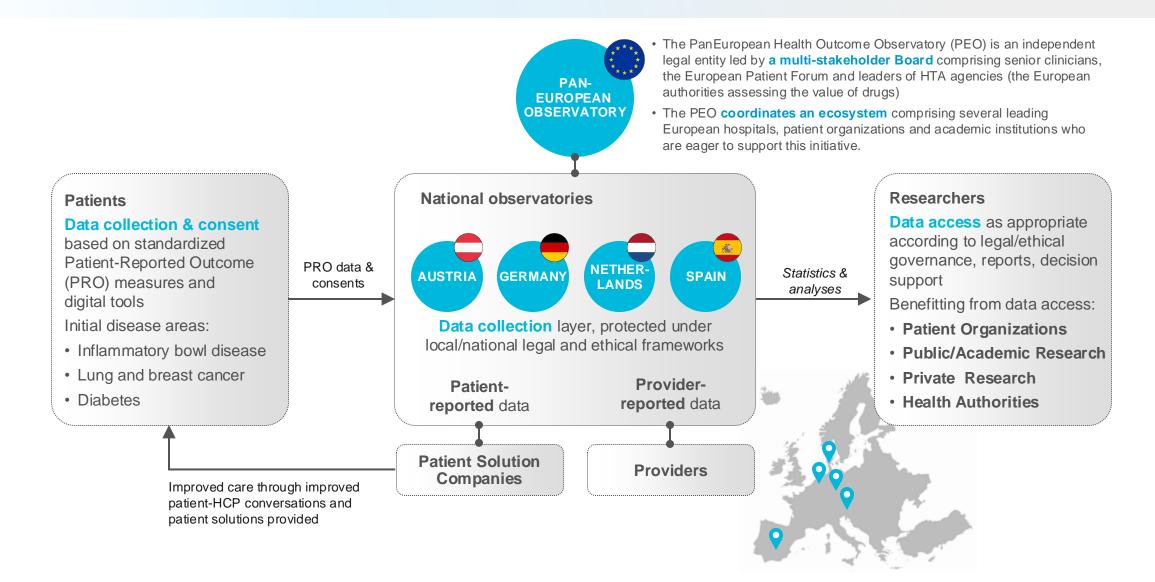
However, electronic health records (EHRs) do not capture the data needed for assessing the value of drugs:

- HTA agencies require specific RWE –
 they want insights on overall survival, quality
 of life, adverse effects, treatment dropouts,
 and reasons for changing treatment
- This type of data to assess the value of drugs is not captured in EHRs, even if they were interoperable – pharma companies must collect this data through a registry
- HTA agencies rely on registries and observational studies, but these are costly, fragmented, and inefficient

H₂O provides an alternative:

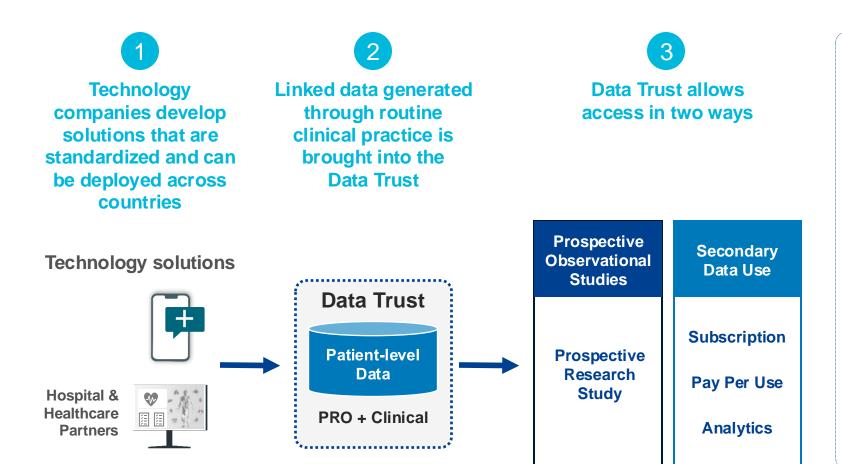
A scalable, registry-quality RWE solution that is more cost-effective, standardized, and patient-centric, making it easier for HCPs to participate

H2O works within the framework of a Pan European Health Outcome Observatory (PEO)





H₂0 | The value H2O provides is: Being the unique base for PRO's in Europe



- Unique Core dataset: connection of both Electronic Health Record data with Patient Reported Outcomes (PRO)
- Automation potential:
 Automating processes to streamline study setup and execution, reducing costs and timelines
- PRO innovation: Ability to create and implement new PRO core outcome sets to ensure standardization of data collection

- 1. Need to create better patient and health care provider incentives so most of a population of patients is using PROs as a way of communication between patient and HCP.
- 2. Standardization on patient outcomes, both clinically captured, and PROs is critical but can be done through multistakeholder consensus.
- 3. Keep trust high with data linking in each country and analysing data at EU level in a federated model for secondary use.
- 4. More investment is necessary while business model needs to offer value to all stakeholders.





health-outcomes-observatory.eu









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PANEL DISCUSSION



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Thank you for your contributions!

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