



The Pharmacoeconomic Perspective

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**From televised debate between
the two candidates for premierminister
on the topic of high prices on hospital dispensed drugs**

”Jeg kan ikke se for mig en situation, hvor vi skal prioritere. Borgerne forventer verdensklasse, når de møder det danske sundhedsvæsen”

*Statsministerkandidat, TV2 – June 5th 2015
ved debat om ‘dyr’ medicin*

I can't imagine a situation where we must prioritize.
Citizens expect world class when they meet
the Danish health care system

When we in Denmark introduce new (cancer) drugs price/costs must not be considered

For instance September 9th: The council on introduction of new hospital dispensed medicines, KRIS, recommende six cancer drugs

... comments on two drugs: bevacizumab (Avastin) and nivolumab (nivolumab BMS):

- **‘in the council we emphasized that for patients treated with Avastin we observed a survival gain of 3.7 months compared to chemotherapy.**
- **As concerns Nivolumab BMS ... a considerable better effect compared to existing treatment was observed. Patients’ median survival was *3.2 months longer*, og 1-year survival proportion was doubled.**
- **The side effects of both drugs were manageable.’**

Council chairman Steen Werner Hansen

A challenging cancer report (2011)

The Lancet Oncology Commission

Delivering affordable cancer care in high-income countries

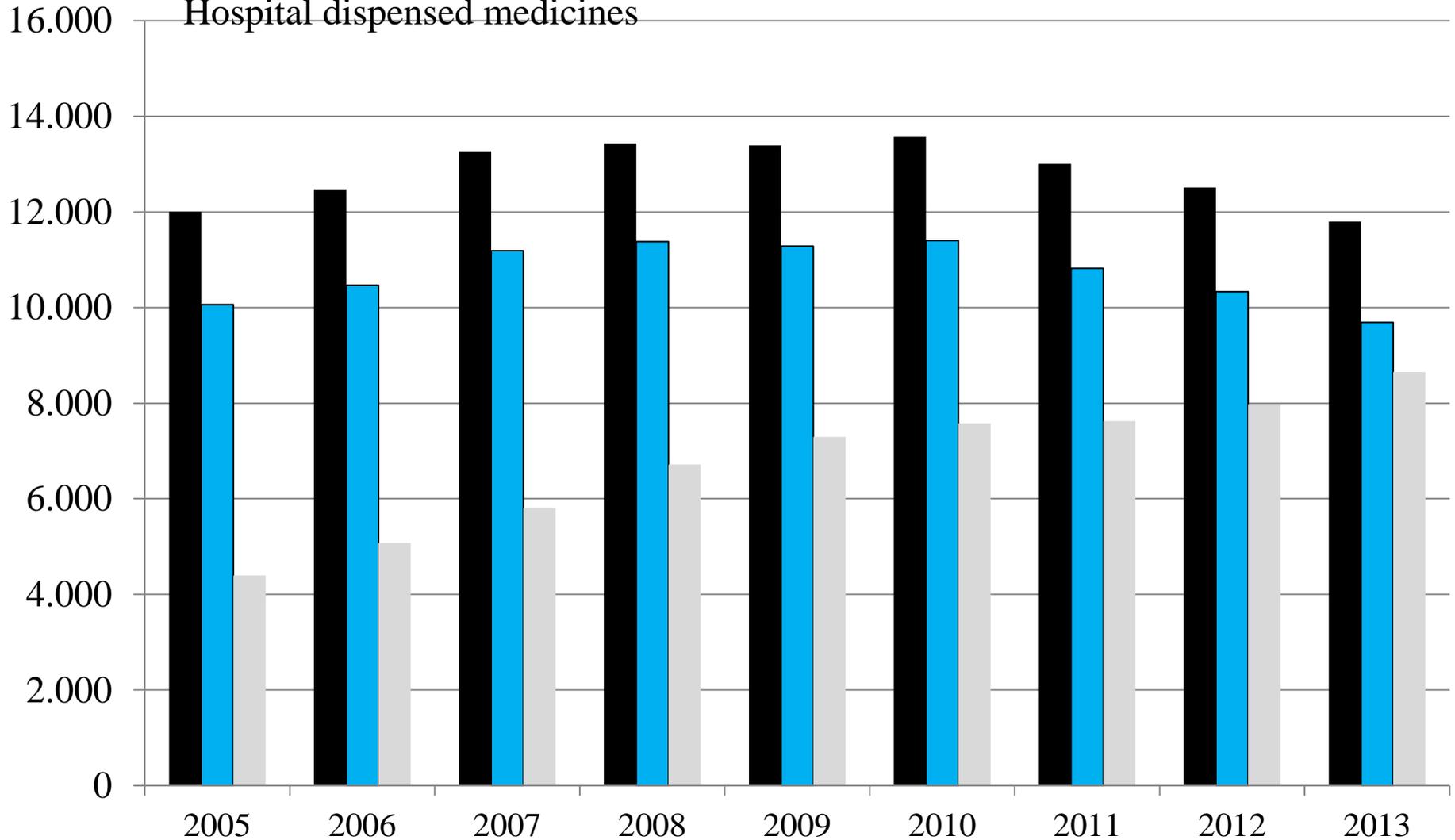
Richard Sullivan, Jeffrey Peppercorn, Karol Sikora, John Zalcborg, Neal J Meropol, Eitan Amir, David Khayat, Peter Boyle, Philippe Autier, Ian F Tannock, Tito Fojo, Jim Siderov, Steve Williamson, Silvia Camporesi, J Gordon McVie, Arnie D Purushotham, Peter Naredi, Alexander Eggermont, Murray F Brennan, Michael L Steinberg, Mark De Ridder, Susan A McCloskey, Dirk Verellen, Terence Roberts, Guy Storme, Rodney J Hicks, Peter J Ell, Bradford R Hirsch, David P Carbone, Kevin A Schulman, Paul Catchpole, David Taylor, Jan Geissler, Nancy G Brinker, David Meltzer, David Kerr, Matti Aapro

The burden of cancer is growing, and the disease is becoming a major economic expenditure for all developed Lancet Oncol 2011; 12: 933-80

“A radical shift in cancer policy is also required. Political toleration of unfairness in access to affordable cancer treatment is unacceptable. The cancer profession and industry should take responsibility **and not accept a substandard evidence base and an ethos of very small benefit at whatever cost; rather, we need delivery of **fair prices** and real value from new technologies.”**

Danish expenditures on pharmaceuticals

- Primærsektoren omsætning
Prescription medicines from GP+OTC
- Receptpligtig medicin
Prescription medicines from GP
- Hospitaler, omsætning tillagt moms
Hospital dispensed medicines



Pharmaceutical expenditures make up 16% of to health expenditures

Expenditures for cancer drugs have increased by 47% 2010 – 2015 (without increasing number of cancer cases)

Total expenditures for hospital dispensed drugs increased by 28 % 2010 til 2014, equivalent to app. 1.5 mia. billion DKK.

Development in cancer drug expenditures.

Figur 1. Udviklingen i omsætning af kræftlægemidler i mio. kr.

| | 2010 | 2011 | 2012 | 2013 | 2014 | 2015* |
|--------------------------------|--------------|--------------|--------------|--------------|--------------|--------------|
| L01- Cytostatika | 1.173 | 1.177 | 1.313 | 1.394 | 1.550 | - |
| L02 - Hormonterapi | 222 | 179 | 127 | 223 | 291 | - |
| L03 – Immunstimulerende midler | 84 | 89 | 84 | 78 | 78 | - |
| L04 - Immunsuppressiva | 36 | 42 | 69 | 78 | 72 | - |
| Total | 1.515 | 1.486 | 1.594 | 1.773 | 1.991 | 2.236 |

* Estimat: samme procentstigning som fra 2013 til 2014

Kilde: AMGROS (SygehusApotekets IndkøbsPris: leverandørens tilbudspris med tillæg af AMGROS avance, svarende til regionernes udgifter til sygehusmedicin)

If the percentage increase over the past two years continues in 2015, expenditures in 2015 will increase by app. 239 mill. DKK (12% increase compared to 2014)

Percentage growth in regional health expenditures

Fixed 2014 prices

| | % growth | | | | | | |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|
| | 2007 - 2008 | 2008 - 2009 | 2009 - 2010 | 2010 - 2011 | 2011 - 2012 | 2012 - 2013 | 2013 - 2014 |
| <i>Hospital, incl. hospital disp. drugs</i> | 4,0 | 7,1 | 0,6 | -2,8 | 0,3 | 2,3 | 0,7 |
| <i>GPs</i> | 4,6 | 4,1 | -0,1 | 0,9 | -1,8 | -2,3 | -2,2 |
| <i>Office based specialists</i> | 7,5 | 6,3 | 4,1 | -1,3 | -3,0 | -0,7 | 2,8 |
| <i>Prescription medicines</i> | -4,5 | -5,8 | 0,5 | -10,0 | -9,4 | -9,8 | 1,0 |
| <i>Tandlægebehandling</i> | 3,0 | 1,9 | -0,2 | -0,6 | -1,4 | -12,3 | -0,6 |
| <i>Fysiurgisk behandling</i> | -2,0 | -13,0 | 1,6 | 7,2 | 1,8 | 2,3 | 2,8 |
| <i>Kiropraktor</i> | 3,9 | 5,0 | -1,6 | 1,8 | -5,1 | 0,3 | 1,8 |
| <i>Fodterapeuter</i> | 31,5 | -3,8 | -2,7 | -0,9 | -18,2 | 10,0 | 6,4 |
| <i>Psykologbehandling</i> | 31,2 | 27,2 | 7,4 | 4,9 | 8,9 | 0,2 | -2,7 |
| TOTALt | 3,4 | 5,5 | 0,7 | -2,9 | -0,6 | 0,9 | 0,6 |

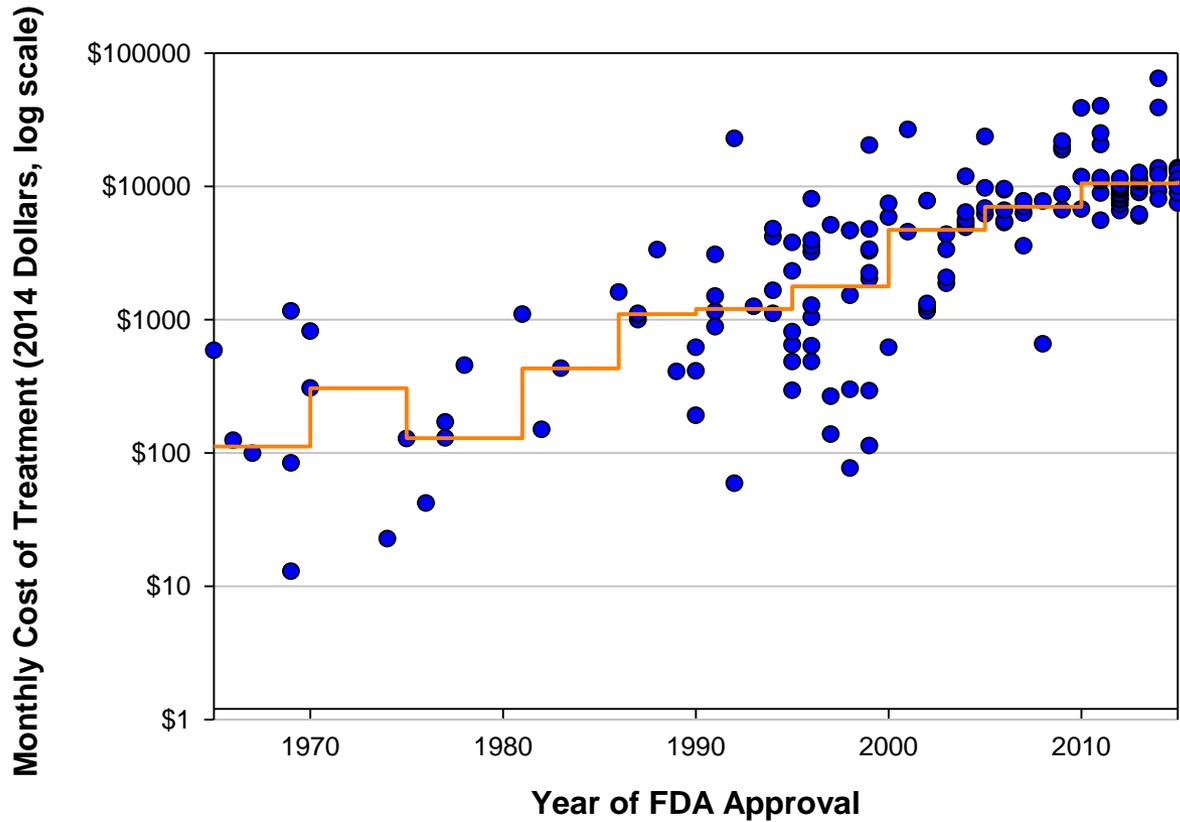
Kilde: Statistikbanken tabel REGR31 og Prisberegner

Low percentage growth in total health expenditures and high growth rates in expenditures for hospital dispensed drugs create dilemmas ...

Expenditures for treatment with cancer drugs has gradually increased.

(partly due to biologicals)

Monthly and Median Costs of Cancer Drugs at the Time of FDA Approval 1965-2015



Source: Peter B. Bach, MD, Memorial Sloan-Kettering Cancer Center

Why high prices?

1. Patents

- Patents mean a de facto monopoly
 - Hence pricing based on ‘what the market will take’ (despite regulation in many countries).

2. Biosimilars are emerging as patents expire

- Will put pressure on prices
- Probably not to the same extent as generics

3. High prices also due to manufacturing methods (but probably a minor part of the explanation)



From: **Five Years of Cancer Drug Approvals: Innovation, Efficacy, and Costs**

JAMA Oncol. Published online April 02, 2015. doi:10.1001/jamaoncol.2015.0373

Table. Last 20 Oncologic Drugs Approved Between 2009 and 2013 by the US Food and Drug Administration

| Drug and Indication | Cost per Year of Treatment, \$ ^a | Parent Drug | Mechanism of Action | Clinical Benefit |
|---|---|-------------------|--|---|
| Sorafenib for papillary thyroid cancer | 140 984 | NA | First approved VEGFR and RAS tyrosine kinase inhibitor | Median PFS, 10.8 vs 5.8 mo |
| Crizotinib for non-small-cell lung cancer | 156 544 | NA | Anaplastic lymphoma kinase inhibitor | Median PFS, 7.7 vs 3.0 mo |
| Ibrutinib for follicular lymphoma | 157 440 | NA | Bruton tyrosine kinase inhibitor | RR, 66%; median DOR, 17.5 mo |
| Obinutuzumab for chronic lymphocytic leukemia | 74 304 | Rituximab | Anti-CD20 monoclonal antibody | Median PFS, 23.0 vs 11.1 mo |
| Pertuzumab for breast cancer | 78 252 | Trastuzumab | Anti-her2 monoclonal antibody | Pathologic CR, 39.3% vs 21.5% |
| Nab-paclitaxel ^b for pancreatic cancer | 82 231 | Paclitaxel | Albumin-bound paclitaxel (microtubule inhibitor) | Median OS, 8.5 vs 6.7 mo |
| Afatinib for non-small-cell lung cancer | 79 920 | Erlotinib | EGFR tyrosine kinase inhibitor | Median PFS, 11.1 vs 6.9 mo; median OS, NS |
| Lenalidomide for mantle-cell lymphoma | 124 870 | Thalidomide | Immunomodulatory drug (thalidomide analogue) | RR, 26%; median DOR, 16.6 mo |
| Trametinib for malignant melanoma | 125 280 | NA | First approved mek inhibitor | Median PFS, 4.8 vs 1.5 mo |
| Dabrafenib for malignant melanoma | 109 440 | Vemurafenib | BRAF inhibitor | Median PFS, 5.1 vs 2.7 mo; median OS, NS |
| Radium 223 for prostate cancer | 82 800 | NA | First approved radiotherapeutic drug | Median OS, 14.0 vs 11.2 mo |
| Erlotinib for non-small-cell lung cancer | 82 827 | NA | First approved EGFR tyrosine kinase inhibitor | Median PFS, 10.4 vs 5.2 mo; median OS, NS |
| Ado-trastuzumab emtansine for breast cancer | 113 161 | NA | First approved anti-her2 antibody drug conjugate | Median PFS, 9.6 vs 6.4 mo; median OS, 25.1 vs 20.9 mo |
| Pomalidomide for multiple myeloma | 150 408 | Thalidomide | Immunomodulatory drug (thalidomide analogue) | RR, 29%; median DOR, 7.4 mo |
| Bevacizumab for colorectal cancer | 59 422 | NA | First anti-VEGF monoclonal antibody | Median PFS, 5.7 vs 4 mo; median OS, 11.2 vs 9.8 mo |
| Ponatinib for chronic myeloid leukemia and Ph ⁺ acute lymphoblastic leukemia | 137 952 | Imatinib | Bcr-abl tyrosine kinase inhibitor | Major cytogenetic response, 54%; median DOR, 3.2-9.5 mo |
| Abiraterone for prostate cancer | 92 092 | Ketoconazole | Androgen biosynthesis inhibitor | Median OS, 35.3 vs 30.1 mo |
| Cabozantinib for medullary thyroid cancer | 118 800 | NA | First multikinase (including c-met and VEGF) inhibitor | Median PFS, 11.2 vs 4 mo; median OS, NS |
| Omacetaxine for chronic myeloid leukemia | 168 366 | Homoharringtonine | Protein translation inhibitor | Major cytogenetic response, 14.3%; median DOR, 12.5 mo |
| Nab-paclitaxel ^b for non-small-cell lung cancer | 82 231 | Paclitaxel | Albumin-bound paclitaxel (microtubule inhibitor) | RR, 33% vs 25%; median OS, NS |
| Regorafenib for colorectal cancer | 141 372 | Sorafenib | Multikinase inhibitor | Median PFS, 2 vs 1.7 mo; median OS, 6.4 vs 5 mo |

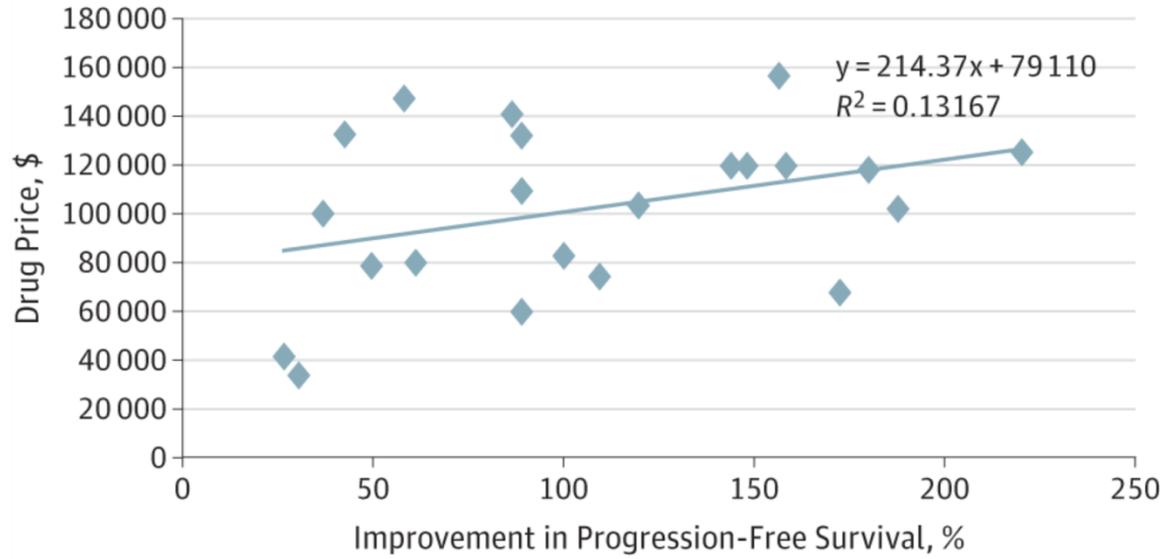
(few) additional months - rarely > 12 months

Abbreviations: CR, complete response; DOR, duration of response; NA, not applicable; NS, not significant; OS, overall survival; PFS, progression-free survival; Ph⁺, Philadelphia chromosome positive; RR, response rate;

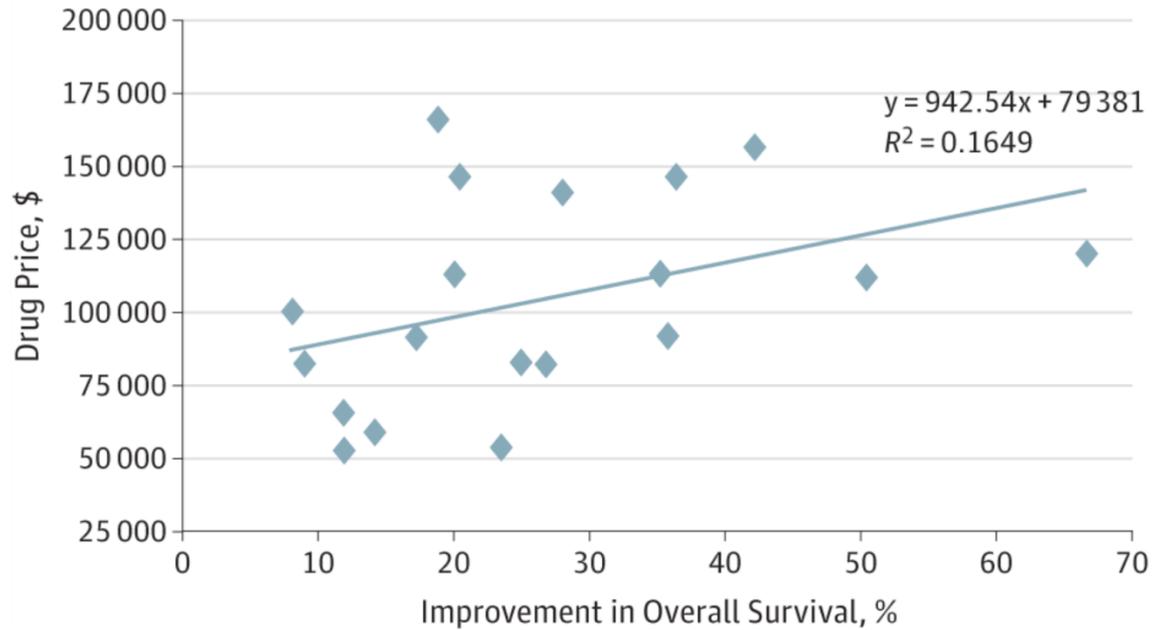
^a Average wholesale prices were obtained from Redbook online ([subscription required] <http://www.redbook.com/redbook/online/>).

^b This drug was approved separately for 2 indications.

A Progression-free survival



B Overall survival

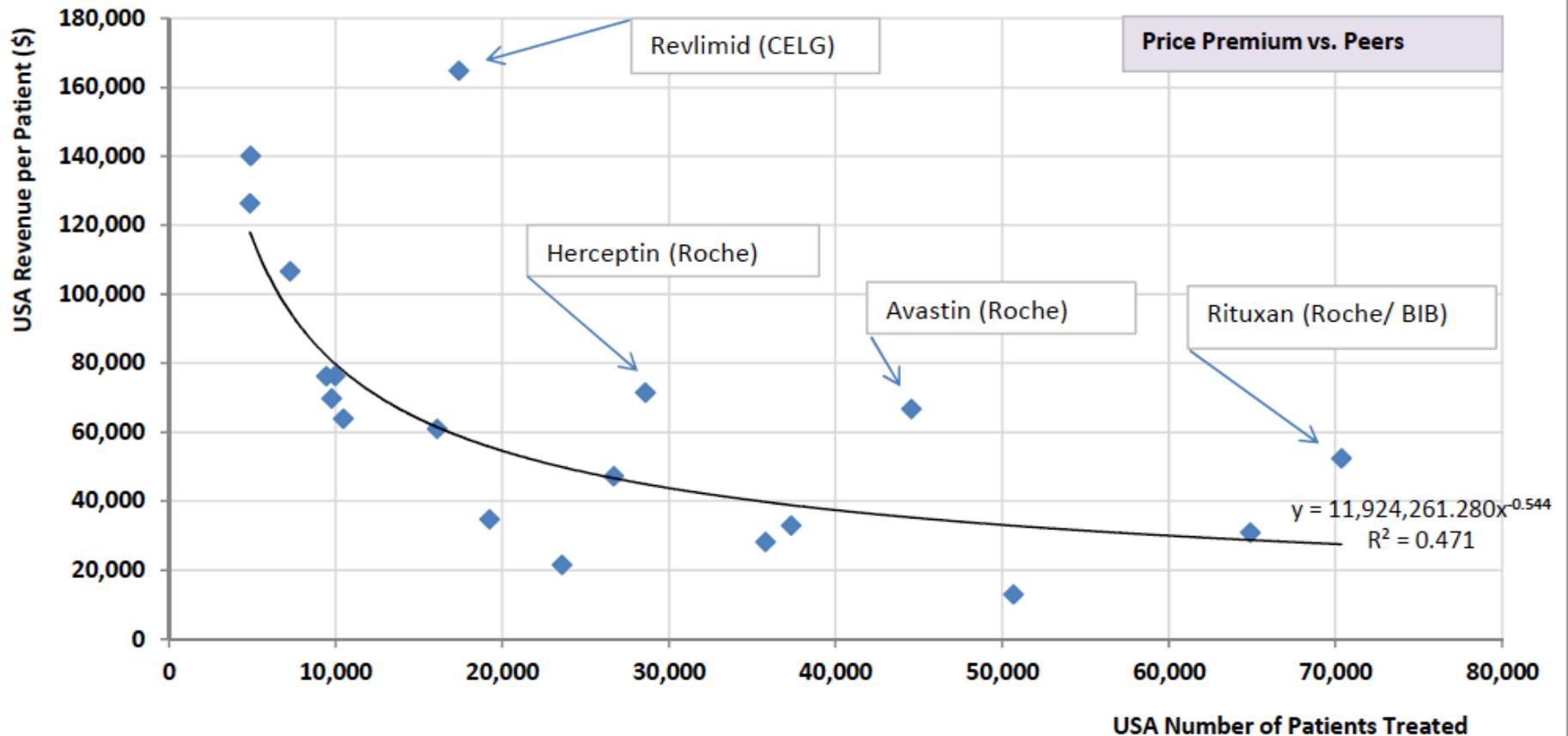


“Our results suggest that *the price of cancer drugs is independent of novelty*. Additionally, we found little difference in price among drugs approved based on time-to-event end points and drugs approved on the basis of RR. Our results suggest that current pricing models are not rational but simply reflect what the market will bear.”

Source: Five Years of Cancer Drug Approvals: Innovation, Efficacy, and Costs

Top 20 USA Cancer Drugs in 2014, Revenue per Patient per Year vs. No. of Patients Treated

Source: EvaluatePharma® (22 SEP 2014)



Note: In theory the products with the highest sales should represent the best patient outcome, cost out of healthcare and improved patient economic activity relative to the competition, for the indications sales are achieved in. Within the USA market the price can rise or fall (off-invoice discounting) post approval, which in a free market system is to be expected. A price rise should signify an enhanced understanding of the drug profile vs. the competition, but may also be the company taking advantage of the risk of switching patients or entrenched prescribing habits.

Top 10 USA Cancer Drugs by Sales: USA Revenue per Patient per Year vs. No. of Patients Treated 2014

| | Product | Company | Sales (\$m) 2014 | No. of Patients | Revenue Per Patient | Patient Compliance | Off-Invoice Discount |
|----|----------------|-------------------|---------------------|--------------------|------------------------|-----------------------|-------------------------|
| 1 | Rituxan | Roche | 3,707 | 70,347 | 52,459 | | |
| 2 | Avastin | Roche | 2,928 | 44,552 | 66,828 | | |
| 3 | Revlimid | Celgene | 2,107 | 17,380 | 164,859 | | |
| 4 | Herceptin | Roche | 2,060 | 28,587 | 71,513 | | |
| 5 | Gleevec | Novartis | 2,023 | 64,884 | 31,006 | 40% | -23% |
| 6 | Stelara | Johnson & Johnson | 1,269 | 37,327 | 32,997 | 78% | |
| 7 | Alimta | Eli Lilly | 1,251 | 26,674 | 47,300 | | |
| 8 | Zytiga | Johnson & Johnson | 992 | 35,801 | 28,212 | 44% | -20% |
| 9 | Velcade | Takeda | 983 | 16,097 | 61,053 | | |
| 10 | Afinitor | Novartis | 779 | 7,253 | 106,675 | | -15% |
| | Average Top 10 | | 1,810 | 34,890 | 66,290 | | |
| | Average Top 20 | | 1,236 | 24,587 | 64,266 | | |

How should we decide on the introduction of new drugs?

1. As stated by the premierminister candidates: If documented positive clinical effects, we pay any price?
2. Critical evaluation of the size of the clinical effect, side effects etc. followed by price negotiations (the German IQWiG-model)?
3. Look at added clinical effect and added additional costs: cost-effectiveness
 - like virtually the rest of the world

IQWiG in 2014 evaluated 36 drugs ...

and 21 was labeled: 'kein zusatznutzen' (no additional value)

- After 'labeling' follows price negotiations to be settled within 1 year

Wie hat das IQWiG in 2014 bewertet?

Zusatznutzen



In 36 Dossierbewertungen, darunter 13 mit Addendum (12 in 2014 und 1 in 2015, Sipuleucel-T), hat das IQWiG 15-mal einen Zusatznutzen festgestellt und 21-mal keinen.

Quelle: IQWiG 2014

Modul 1

- Administrative Informationen
- Zusammenfassung der Aussagen im Dossier

Modul 2

- Allgemeine Angaben zum Arzneimittel
- Zugelassene Anwendungsgebiete

Modul 3

- Zweckmäßige Vergleichstherapie
- Anzahl der Patienten mit therapeutisch bedeutsamem Zusatznutzen
- Kosten der Therapie für die GKV
- Anforderungen an eine qualitätsgesicherte Anwendung

Modul 4

- Methodik zur Ermittlung des medizinischen Nutzens und des medizinischen Zusatznutzens
- Ergebnisse zum medizinischen Nutzen und Zusatznutzen
- Patientengruppen, für die ein therapeutisch bedeutsamer Zusatznutzen besteht

Modul 5

- Volltexte der zitierten Quellen • Studienberichte • Bewertungsbericht der Zulassungsbehörde
- Checkliste formale Vollständigkeit • Dokumentation der Informationsbeschaffung
- Wesentliche Zulassungsunterlagen

Cost-effectiveness threshold & common misunderstandings

(incremental cost-effectiveness ratio)

$$\text{ICER} = \frac{C_{\text{eksisteren de}}}{E_{\text{eksisteren de}}} - \frac{C_{ny}}{E_{ny}} < ??? \text{ (cost per QALY)}$$

NEJ: No – is not equivalent to put a price on life!

But rather MEN

Could the same money have created higher health gains elsewhere in the health care system?

(alternative costs/opportunity costs/displacement)

NICE threshold values

1. <£20.000 per QALY bliver i de fleste tilfælde godkendt, da interventionen er ”omkostnings-effektiv”.
2. £20.000-£30.000 per QALY godkendes i tilfælde, hvor der er stor sikkerhed omkring udfaldet eller effekten af behandlingen.
3. >£30.000 per QALY afvises. Dog kan behandlingen godkendes under særlige omstændigheder. Der er fx en særlig kategori med ”end-of-life” præparater m. en højere tærskelværdi.

Den første kategori er en anbefaling der følger EMAs indikation. I kategori 2 er grænsen flydende. Der er fire grunde til ikke at have en absolut tærskelværdi (Rawlins & Culyer, 2004):

- at tærskelværdien ikke er en værdi baseret på videnskabelig fakta
- situationer hvor NICE vil vælge at ignorere en fastsat tærskelværdi (f.eks. end-of-life)
- Ved at sætte en fastsat tærskelværdi, vil man indikere at effektivitet vejer tungere end for eksempel etiske aspekter
- En fastsat tærskelværdi vil ikke skabe incitament til konkurrence fra i industriens side.

“Given the fixed budget of the NHS, the appropriate threshold is that of the opportunity cost of programmes displaced by new, more costly technologies”

Kilde: 2004 Guide to the Methods of Technology Appraisal

”There is no empirical basis for assigning a particular value (or values) to the cut-off between cost effectiveness and cost ineffectiveness. The consensus amongst the Institute’s economic advisors...”

Kilde: NICE, Social value judgement, guidelines, 2005

“The threshold therefore represents the additional cost that has to be imposed on the system to forgo 1 quality-adjusted life-year (QALY) of health through displacement. There are no empirical estimates of the cost-effectiveness threshold used by the National Institute for Health and Care Excellence”.

Kilde: Claxton et al. 2015

NICE om Kadcyla:

Our job is to recommend whether it should transfer into the NHS budget. We are very aware of the importance that people place on life-extending cancer drugs and a decision **not to recommend a cancer treatment** for routine NHS funding is never taken lightly. We apply as much flexibility as we can in approving new treatments, but the reality is that given its price and what it offers to patients, **it will displace more health benefit which the NHS could achieve in other ways, than it will offer to patients with breast cancer.**" Andrew Dillon, adm. direktør NICE

"Although Roche proposed a discount to the full list price of Kadcyla, it made little difference to its value for money, leaving it well above the top of our specially extended range of cost effectiveness for cancer drugs" (NICEs hjemmeside).

A thought provoking addition to price negotiations is found in the following BBC-article the next day: "Officials at Roche told me that they were willing to come down on price "significantly", but that there was a limit to this considering other European countries, including Sweden, Switzerland, **Denmark** and Austria had agreed to pay the full price. (BBC 08.08.2014, KMP's bold letters)"

Another source says that the firm's list price should be reduced by 60% to bring the ICER below the NICE threshold

Recent NICE decision

The National Institute for Health and Care Excellence's, NICE appraisal committee gave a thumbs-down to Cyramza (ramucirumab) for use alone or in combination with another cancer drug, paclitaxel.

The drug's cost rings in at about £42,000 per QALY, NICE, said in an appraisal document, well and above the watchdog's usual price recommendations

But it's not just the price tag that has NICE concerned. It's the cost in light of Cyramza's survival data. In one trial, patients who took Cyramza and paclitaxel survived just 2.27 months longer on average than those in the control arm. In another study, Cyramza beat out placebo by adding 1.4 months to patients' lives.

NICE said in its appraisal document. NICE is taking public comments for Cyramza until Oct. 6 and will hold a second appraisal committee meeting on Oct. 20, the cost gatekeeper said