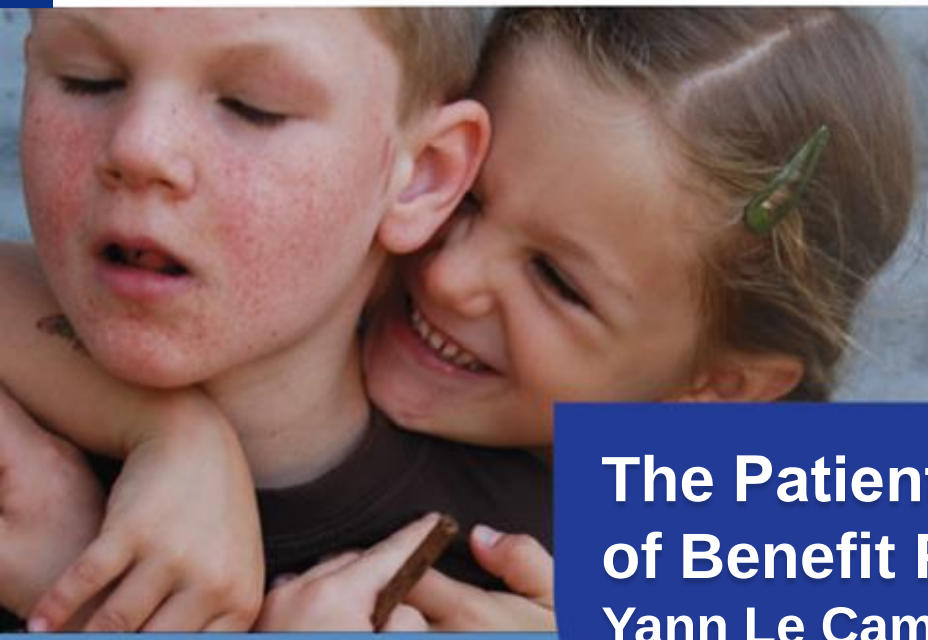
EURORDIS
Rare Diseases Europe



The Patient's Understanding of Benefit Risk

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5 Key Concepts

- Rare Disease Treatments Evidence Generation is a Continuum
- Flexibility of Regulators should become an Official Policy
- Focus on Effectiveness beyond Quality, Safety and Efficacy
- Bridging the Gap Between EU Centralised Regulatory Decision and National Decisions on Pricing & Reimbursement
- Enhancing the Dialogue Between all Stakeholders all Along the Product Development & Life Cycle

10 Main Proposals

1. **Early Dialogue / scoping / de-risking : EMA + HTA + Payers + PO + Experts**
2. **RD Data Collection & Registries & Natural History Studies**
3. **Clinical Trials : EU Expert Opinion + adaptive design & statistical methodology + alternative to animal models + surrogate endpoints**
4. **Progressive Patient Access / Adaptive Licensing**
5. **Stronger FDA – EMA Collaboration : Common Guidelines**
6. **CAVOMP: EMA & HTA dialogue**
7. **MOCA: Payers dialogue / Value Framework / Price negotiations**
8. **Pan-European Managed Entry Agreements**
9. **Differential Pricing**
10. **National Measures in RD National Plans/ Strategies**

Timely Access and Benefit-Risk

- Today, patients representatives are already involved in exercises comparable to Benefit-Risk Assessment – so an evolution rather than a revolution:
  - Significant Benefit Assessment at time of MAA – in COMP / EMA
  - Protocol Assistance / Scientific Advice – in SAWP / EMA
  - Results of Pediatric Investigation Plan – in PDCO / EMA
  - Assessment of Benefit-Risk of Advanced Therapies – in CAT / EMA
  - Assessment of Pharmacovigilance data – in PRAC / EMA
  - Experts in Value Assessment in national HTA and European Common Assessment Reports – in HTA

Timely Access and Benefit-Risk

- Accelerated approval are being promoted by patients groups in USA and EU : Higher level of uncertainties calls for higher involvement of patient in risk-benefit assessment
  - From patient perspective, the trade-off on risk cannot be the same when treatments already exist or when there is no treatment available
  - Stratified medicines / personalized medicines call for new approach to benefit – risk assessment
  - In EU at EMA: Patients Progressive Access – currently referred to as "Adaptive Licensing" – based on Conditional Marketing Authorisation and post-MA safety and efficacy studies from new EU PhV Regulation
  - Particularly intended for a) diseases which are severe b) with no alternative therapies c) products with a good safety profile
  - At end of Phase 2 studies or Phase 3 needing confirmatory study, for products having robust data and clarity on the benefit for a sub-population of the population targeted therapeutic indication

Tools and Methods for Engaging Patients in Benefit – Risk Assessment

- Anticipation and early dialogue
  - Safe harbor early dialogue (EMA)
  - Protocol Assistance / Scientific Advice (EMA)
  - Guidelines on Patient Relevant Outcomes (community)
- Engagement of Patients in Benefit-Risk Assessment
  - Disease specific patient representatives & EURORDIS to support them
  - Direct dialogue with the Assessors – the 2 CHMP co-rapporteurs
  - Direct engagement in CHMP discussion: educate on the disease, on what are meaningful clinical benefits for patients
- Patient generated knowledge on preferred treatment option
  - Written feedback from patient groups
  - Survey of patients or parents
- Post- opinion communication to patient and families