

Draft Guidelines for the Economic Evaluation of Health Technologies in Ireland

For public consultation

Consultation Feedback Form

October 2017

Your feedback is very important to us. We welcome responses to all questions as well as any additional comments you would like to make.

When commenting on a specific section of a document, it would help if you can identify which element you are commenting on and the relevant page number.

The closing date for consultation is 5pm on Wednesday 15 November 2017

You may email or post a completed form to us. You may also complete and submit your feedback online at www.higa.ie.

About you

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Date	15 November 2017

General Information and Questions

You may provide us with feedback on the specific questions (see questions that follow), or alternatively you may provide us with general comments.

Part 1

Are you replying in a personal capacity or on behalf of an institution or organisation?

- Personal capacity
- On behalf of an institution
- On behalf of an organisation

IPPOSI

Part 2

Please outline any general or specific feedback on the documents. In your response, where applicable, please specify the section or page and line number to which you are referring.

IPPOSI, the Irish Platform for Patient Organisations, Science and Industry has already provided feedback to HIQA on the proposed guidelines in its capacity as a member of the HTA Scientific Advisory Group and as a participant in the guidelines drafting process.

We are pleased that HIQA have included Life Years Gained (LYG) as a measure in evaluating outcome. We recommend that the guidelines require the use of this measure by assessors and evaluators, where appropriate and in addition to the standard QALY measure. However, we remain concerned by the over-reliance on QALY and we continue to call on HIQA to provide guidance around alternative measures for assessing and evaluating outcome in order to address instances when QALY may not be the most appropriate choice or when assumptions which inform QALY may not be appropriate.

We are encouraged by the recognition that the evidence needed to assess and evaluate the cost effectiveness of a treatment is continually generated and that scenario analysis should attempt to capture future changes as part of the assessment and evaluation. However, rather than ask assessors and evaluators to forecast, we continue to recommend the introduction of a process to re-assess or re-evaluate on the basis of new information.

We welcome the move to allow assessments and evaluations to consider secondary analysis from other government departments (welfare, employment, education) which is a first step in meeting IPPOSI's call to give greater weight to non-health evidence in measuring the outcome of a particular treatment.

We continue to urge HIQA to align its guidance with European best practice and to adopt approaches which could facilitate the future sharing and use of health technology assessment reports between European member states. We believe that the guidelines should also address how assessment and evaluation in Ireland may give consideration to the findings of assessments and evaluations which have already been carried out by neighbouring countries.

We continue to request that HIQA include a worked example of economic evaluation and budget impact analysis – as has been done in Canada.

Thank you for taking the time to give us your views.

After the closing date, we will assess all feedback and use it to finalise our documents. The final documents and the Statement of Outcomes (a summary of the responses) will be published on <http://www.hiqa.ie>.

If you wish to do so, you can request that your name and/or organisation be kept confidential and excluded from the published summary of responses. Please note that we may use your details to contact you about your responses. We do not intend to send responses to each individual respondent.

Please return your form to us either by email or post:



consultation@hiqa.ie



Health Information and Quality Authority
HTA on Public Access Defibrillation
George's Court
George's Lane
Dublin 7



If you have any questions you can contact the consultation team by calling (01) 814 7463.

**Please return your form to us either by email or post before
5pm on Wednesday 15 November 2017**

Please note that the Authority is subject to the Freedom of Information Acts and the statutory Code of Practice regarding FOI.

For that reason, it would be helpful if you could explain to us if you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but

we cannot give an assurance that confidentiality can be maintained in all circumstances.