Benefit of expedited regulatory approval for oncology drugs eliminated by slow reimbursement reviews and price negotiations

Description

Benefit of expedited regulatory approval for oncology drugs eliminated by slow reimbursement reviews and price negotiations

Nigel S B Rawson and David J Stewart

ABSTRACT

Summary: In an examination of 92 oncology drugs that received regulatory approval from Health Canada with a Notice of Compliance with conditions (NOC/c) since the policy was introduced in 1998 through to December 1, 2021, the authors concluded the "NOC/c policy has been successful in providing expedited access to promising therapies." We investigated the time required by Canada's Drug Agency (CDA) to complete reimbursement reviews and the pan-Canadian Pharmaceutical Alliance (pCPA) to perform price negotiations with manufacturers for 66 of the 92 drugs that were likely to have been eligible for review and negotiation. Twelve of the 66 drugs had no submission to CDA; potential reasons were identified for six. In the other 54 drugs, 37 (68.5%) had a positive CDA review and 17 (31.5%) a negative review. Only seven reviews (13.0%) took less than CDA's claimed "typical timeline" of 180 days or less, while almost three-quarters were within its 270-day target. The pCPA's targets of 40 business days (60 calendar days) for deciding whether to negotiate and 90 business days (130 calendar days) for completion of negotiations were achieved for only 37% of the recommendations and 41% of the negotiations. The resulting delays led to the time between NOC/c and final pCPA outcome being close to two years for over 50% of the drugs and almost three years for a quarter of them. This delay is compounded by government drug plans taking further lengthy time periods to decide whether to fund the drugs. The potential benefit to patient access of an expedited regulatory review resulting in an NOC/c is eliminated when unnecessarily extensive delays occur in reimbursement review and price negotiation processes established by government drug plans.

Authors credentials and affiliations:

- 1. NSB Rawson PhD, CHPI affiliated scholar.
- 2. DJ Stewart MD, Department of Medicine at the University of Ottawa and the Division of Medical Oncology at the Ottawa Hospital.

Disclosure: no conflicts declared.

Status: Peer reviewed.

Submitted: 09 AUG 2024 | Published: 20 AUG 2024

Citation: Nigel S B Rawson, David J Stewart (2024). Benefit of expedited regulatory approval for oncology drugs eliminated by slow reimbursement reviews and price negotiations. *Canadian Health Policy*

, AUG 2024. https://doi.org/10.54194/KJRY1417 canadianhealthpolicy.com.

REFERENCES

- Martin A, Hunt M, Blommaert S, et al. Oncology drug approvals under Health Canada's Notice of Compliance with conditions policy: a retrospective cohort analysis. Can J Health Technol 2024;4(5):1-21.
- 2. Guidance document: Notice of Compliance with conditions (NOC/c). Ottawa: Government of Canada, 2016. https://www.canada.ca/en/health-canada/services/drugs-health-products/drug-products/applications-submissions/guidance-documents/notice-compliance-conditions.html.
- 3. MacPhail E, Shea B. An inside look at the early history of the CADTH common drug review in Canada. Ottawa: CADTH, 2017.
- https://www.cadth.ca/sites/default/files/pdf/early_history_of_CDR.pdf.
- 4. About pCPA. Toronto: pCPA, 2024. https://www.pcpacanada.ca/about.
- 5. Reimbursement review reports. Ottawa: CDA, 2024. https://www.cadth.ca/reimbursement-review-reports.
- 6. Brand name drug negotiations status. Toronto: pCPA, 2024. https://www.pcpacanada.ca/negotiations.
- Procedures for reimbursement reviews. Ottawa: CDA, 2024. https://www.cadth.ca/sites/default/files/Drug_Review_Process/CADTH%20Drug%20Reimbursement
- pCPA brand process guidelines. Toronto: pCPA, 2023. https://www.pcpacanada.ca/sites/default/files/eng/pCPA_Brand_Process_Guidelines.pdf.
- 9. Rawson NSB, Stewart DJ. Timeliness of health technology assessments and price negotiations for oncology drugs in Canada. Clinicoecon Outcomes Res 2024;16:437-45.
- 10. Berry SR, Evans WK, Strevel EL, Bell CM. Variation and consternation: access to unfunded cancer drugs in Canada. J Oncol Pract 2012;8(1):35-9.
- 11. Stewart DJ, Stewart AA, Wheatley-Price D, et al. The importance of greater speed in drug development for advanced malignancies. Cancer Med 2018;7(5):1824-36.
- 12. Longo CJ, Fitch MI, Loree JM, et al. Patient and family financial burden associated with cancer treatment in Canada: a national study. Support Care Cancer 2021;29(6):3377-86.
- 13. Stewart DJ. A short primer on why cancer still sucks. Victoria: Tellwell, 2022.
- 14. MacPhail C, Snow S. Not all Canadian cancer patients are equal disparities in public cancer drug funding across Canada. Curr Oncol 2022;29(3):2064-72.
- Binder L, Ghadban M, Sit C, Barnard K. Health technology process for oncology drugs: impact of CADTH changes on public payer reimbursement recommendations. Curr Oncol 2022;29(3):1514-26.
- Pigott E, Binder L. Getting better, faster: the case for optimizing access to precision medicines in the wake of the revolution in cancer care. Collective Oncology Network for Exchange, Cancer Care Innovation, Treatment Access & Education, 2023 July 5. https://conected.ca/wpcontent/uploads/Getting-Better-Faster-July-5-2023-FINAL-For-Sharing-1.pdf.
- 17. About us. Toronto: CanCertainty Coalition, 2024. https://www.cancertaintyforall.ca/about_us.
- Sehdev S, Gotfrit J, Elias M, Stein BD. Impact of systemic delays for patient access to oncology drugs on clinical, economic, and quality of life outcomes in Canada: a call to action. Curr Oncol 2024;31(3):1460-9.
- 19. Sehdev S, Rawson NSB, Aseyev OI, et al. Access to oncology medicines in Canada: consensus forum for recommendations for improvement. Curr Oncol 2024;31(4):1803-16.
- 20. Access and time to patient prescription drugs in Canada. Ottawa: Conference Board of Canada, 2024 January 4. https://www.conferenceboard.ca/product/access-and-time-to-patient-jan2024/.

21. Gotfrit J, Shin JJW, Mallick R, Stewart DJ, Wheatley-Price P. Potential life-years lost: the impact of the cancer drug regulatory and funding process in Canada. Oncologist 2020;25(1):e130–7.