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To whom it may concern

Incentives for Global Health has asked IQWiG to comment on the feasibility of health impact assessment of newly introduced pharmaceuticals as would be required in operating the Health Impact Fund or a pilot for it.

I am deputy director of IQWiG since 2005 and have extensive experience of health technology assessment.

The Health Impact Fund is designed so that pharmaceutical companies earn payments based on the assessed health benefits attributable to the use of their registered drugs, compared to what would have happened if they were not available. An important requirement for the realization of the Health Impact Fund is therefore whether such assessment is feasible at a reasonable expense.

In my view, this is indeed feasible. I say this with confidence because such assessments are very similar to those IQWiG ordinarily performs. IQWiG is commissioned by on a regular basis by the German federal joint committee to conduct benefit assessments of new drugs entering the German markets, which determine the additional therapeutic benefit of these drugs over existing alternative treatments such as other drugs or non-drug interventions. The assessment of the additional benefit to patients includes improvement in their health state, reduction in disease duration, life extension, reduction of side effects, and improvement in the quality of life. IQWiG rigorously applies international standards of evidence-based medicine, relying on the results of clinical trials and other health care studies of acceptable quality.

There are, to be sure, additional challenges for the Health Impact Fund, as it would require assessment of health benefits in many countries that differ in their prevailing standards of care and of data collection about prescribing and dispensing. Taking account of such differences would be an additional burden but is methodologically feasible.

In summary, the requirement of the Health Impact Fund to assess health benefits is certainly feasible at a reasonable expense and is indeed exactly what is done by IQWiG and other HTA agencies (e.g. HAS in France or NICE in England and Wales) on a daily basis.

Yours Respectfully,

PD Dr. Stefan Lange