# Integrity and Transparency of Decisions on Essential Medicines



24th Expert Committee on the Selection and Use of Essential Medicines | Geneva, April 24, 2023

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### Disclosures

- No direct financial conflicts
- GRADE Working Group Co-Chair
- Cochrane Canada Director
- Guideline International Network vice chair
- Research grants from Canadian Institutes of Health Research and WHO
- Consultant to WHO, MSIF
- Views expressed my own

### Thanks to:

- T. Piggott (whose thesis work is instrumental for this presentation)!
- Theory of everything collaborators
- L. Moja, B. Huttner









### Today's talk

- 1. Considerations about transparency of EML selection by building on decision-making frameworks
- 2. Opportunities for how transparency may ensure integrity of the selection and how we can learn from other disciplines

### Background

- We submitted an application for inclusion of new oral anticoagulants (direct oral anticoagulants/DOACs) in WHO EML 2015 – rejected: need in LMIC? Cost differential to alternatives (warfarin)?
- Higher cost medicines such as direct acting antivirals for hepatitis
  C are included, but cancer medicines of similar cost have not been
  included

# Concerns about the EML – use of evidence and reporting

- 1) Search strategy, reasons for inclusion or exclusion of data
- 2) Target population, comparison groups, and outcomes of interest
- 3) Quantitative summaries of overall treatment effects for each comparison and outcome
- 4) Quality of supporting evidence
- 5) Conflicts of interest: reporting and management

# Criticism of the EML process

### **ANALYSIS**

### thebmj.com

Listen to a podcast interview with the authors at thebmj.com/podcasts

# Decisions on WHO's essential medicines need more scrutiny

Global endorsement as a WHO essential medicine is a big step. But **Corrado Barbui** and **Marianna Purgato** find that the quality of applications for antidepressants and antipsychotics is poor and call on applicants and WHO to raise standards



### WHO ON ESSENTIAL MEDICINES

### The composition of WHO's expert committee on essential medicines needs more scrutiny

Craig Welch health policy consultant

Garran, Australian Capital Territory, Australia

Barbui and Purgato call for reforms to both the standard of applications to and the clarity of reporting of decisions by the World Health Organization expert committee on essential medicines. I but they don't go far enough. It isn't just the decisions that need more scrutiny but the composition of the committee too.

We are told only that the committee is made up of experts, "appointed by the WHO director general," who meet "every two years to review applications with expert assessors and decide which medicines are added or deleted." Just try to find out from the WHO website who the committee members are before a committee meeting—as opposed to when the meeting report is published—let alone their qualifications, fitness for the role, or conflicts of interest. Why is there never a call for nominations to the committee? The list of current members smacks of croneyism, the appointments process is opaque, and the decisions lack clarity. Transparency is its own reward; WHO should, indeed, try leading by example.

Competing interests: None declared.

 Barbui C, Purgato M. Decisions on WHO's essential medicines need more scrutiny. BM. 2014;349:g4798. (31 July.)

Cite this as: BMJ 2014;349:g5211

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### **Viewpoint**

October 24, 2022

### Reforming the World Health Organization's Essential Medicines List

### Essential but Unaffordable

Thomas J. Hwang, MD<sup>1,2</sup>; Aaron S. Kesselheim, MD, JD, MPH<sup>2</sup>; Kerstin N. Vokinger, MD, JD, PhD<sup>2,3</sup>

JAMA. Published online October 24, 2022. doi:10.1001/jama.2022.19459

### So how can one efficiently ...

- a) enhance the transparency in how medicines are included in the EML?
- b) describe and manage any potential biases (including conflicts) that could influence the process?
- c) foster practical use of the EML in settings different income settings and legal frameworks?
- d) increase the efficiency in the preparation of applications?

2021 anti-PD1 inhibitor application from ESMO used a non-systematic summary of the evidence - a Cochrane review on the exact same question was published Dec. 2020 – the month the application was submitted

### A striking similarity to ...

Practice guidelines and their history at WHO and other decision makers in health

### **NEWS**

Articles

### Storm over W

Feb 4 saw the London of the 1999 WHO-Inter Society of Hypertension (ISH lines for the management of tension. But just hours bef launch, WHO faxed a press re health editors headed "UF

THE LANCET • Vol 353 • February

### Use of evidence i

Andrew D Oxman, John N Lavis, Atle Fre

### Summary

Background WHO regulations, recommendations. However, the for evidence of effects, processe values), and evidence-informed particularly evidence of effects, i

Review

### Improving the use of research evidence in guideline development: I. Guidelines for guidelines

Holger J Schünemann\*1, Atle Fretheim2 and Andrew D Oxman2

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### **Health Research Policy and Systems**



**Open Access** 

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Received: 07 April 2006 Accepted: 21 November 2006

### Learn from guideline science

The process from prioritization to a recommendation and decision is now largely transparent and "reproducible"



### Evidence to decision frameworks to enhance transparency of the process and decision ... also for the EML



GRADE Evidence to Decision (EtD) frameworks: a systematic and transparent approach to making well informed healthcare choices. 2: Clinical practice guidelines

Pablo Alonso-Coello, 1,2 Andrew D Oxman, 3 Jenny Moberg, 3 Romina Brignardello-Petersen, 2,4 Elie A Akl, 25 Marina Davoli, 6 Shaun Treweek, 7 Reem A Mustafa, 28 Per O Vandvik, 3 Joerg Meerpohl, 9 Gordon H Guyatt, 2,10 Holger J Schünemann, 2,10 the GRADE Working Group



GRADE Evidence to Decision (EtD) frameworks: a systematic and transparent approach to making well informed healthcare choices. 1: Introduction

Pablo Alonso-Coello, 1,2 Holger J Schünemann, 2,3 Jenny Moberg, 4 Romina Brignardello-Petersen, 2,5 Elie A Akl. 26 Marina Davoli, 7 Shaun Treweek, 8 Reem A Mustafa, 29 Gabriel Rada, 10,11,12 Sarah Rosenbaum, 4 Angela Morelli, 4 Gordon H Guyatt, 23 Andrew D Oxman 4 the GRADE Working Group

Mobera et al. Health Research Policy and Systems (2018) 16:45 https://doi.org/10.1186/s12961-018-0320-2

Health Research Policy and Systems

Open Access

The GRADE Evidence to Decision (EtD) framework for health system and public health decisions

Jenny Moberg<sup>1\*</sup>, Andrew D. Oxman<sup>1</sup>, Sarah Rosenbaum<sup>1</sup>, Holger J. Schünemann<sup>2</sup>, Gordon Guyatt<sup>3</sup>, Signe Flottorp<sup>1</sup> Claire Glenton<sup>1</sup>, Simon Lewin<sup>1,4</sup>, Angela Morelli<sup>1</sup>, Gabriel Rada<sup>5</sup>, Pablo Alonso-Coello<sup>6</sup>, for the GRADE Working Group

GRADE Guidelines: 16. GRADE evidence to decision frameworks for tests in clinical practice and public health

Holger J. Schünemann<sup>a,b,c,\*</sup>, Reem Mustafa<sup>a,c,d</sup>, Jan Brozek<sup>a,b,c</sup>, Nancy Santesso<sup>a,c</sup>, Pablo Alonso-Coello A.G., Gordon Guyatt A.B., Rob Scholten, Miranda Langendam Mariska M. Leeflang<sup>g</sup>, Elie A. Akl<sup>a,c,h</sup>, Jasvinder A. Singh<sup>c,i</sup>, Joerg Meerpohl<sup>c,j</sup>, Monica Hultcrantzk, Patrick Bossuyt, Andrew D. Oxman, GRADE Working Group

Neumann et al. Implementation Science (2016) 11-93

Implementation Science



### The GRADE evidence-to-decision framework: a report of its testing and application in 15 international guideline panels

Ignacio Neumann<sup>1,2</sup>, Romina Brignardello-Petersen<sup>1,3</sup>, Wojtek Wiercioch<sup>1</sup>, Alonso Carrasco-Labra<sup>1,3</sup>, Carlos Cuello<sup>1</sup>, Elie Akl<sup>4</sup>, Reem A. Mustafa<sup>1,5</sup>, Waleed Al-Hazzani<sup>1</sup>, Itziar Etxeandia-Ikobaltzeta<sup>1,7</sup>, Maria Ximena Roias<sup>8</sup>, Maicon Falavigna9, Nancy Santesso1, Jan Brozek16, Alfonso Iorio1, Pablo Alonso-Coello1, and Holger J. Schünemann<sup>1,6</sup>

Combridge University Press 2017. This is an Open Access article, distributed under the terms of the Creative Commons Attribution licence (http://greativecommons.org/licenses/by/4.0/), whic

### Methods

### GRADE EVIDENCE TO DECISION (ETD) FRAMEWORK FOR COVERAGE DECISIONS

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Drug and Devices Evaluation Area, Emilia-Romagna Region, Bologni

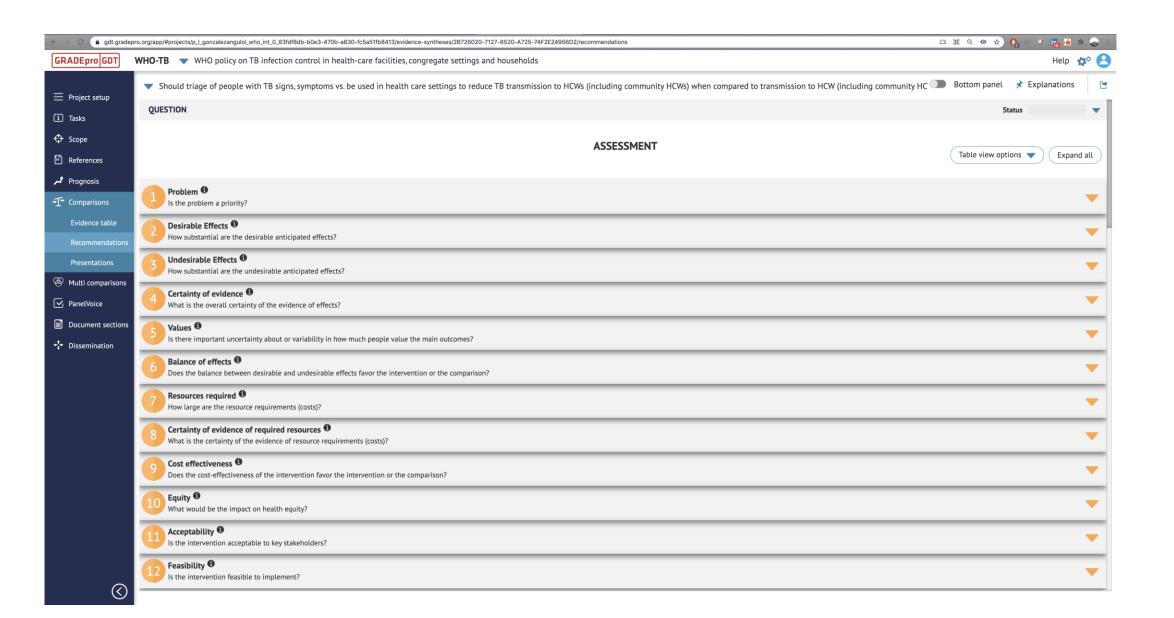
Local Health Authority, Modern

Local Health Authority ASI Roma 1 Rome Holger J. Schüneman

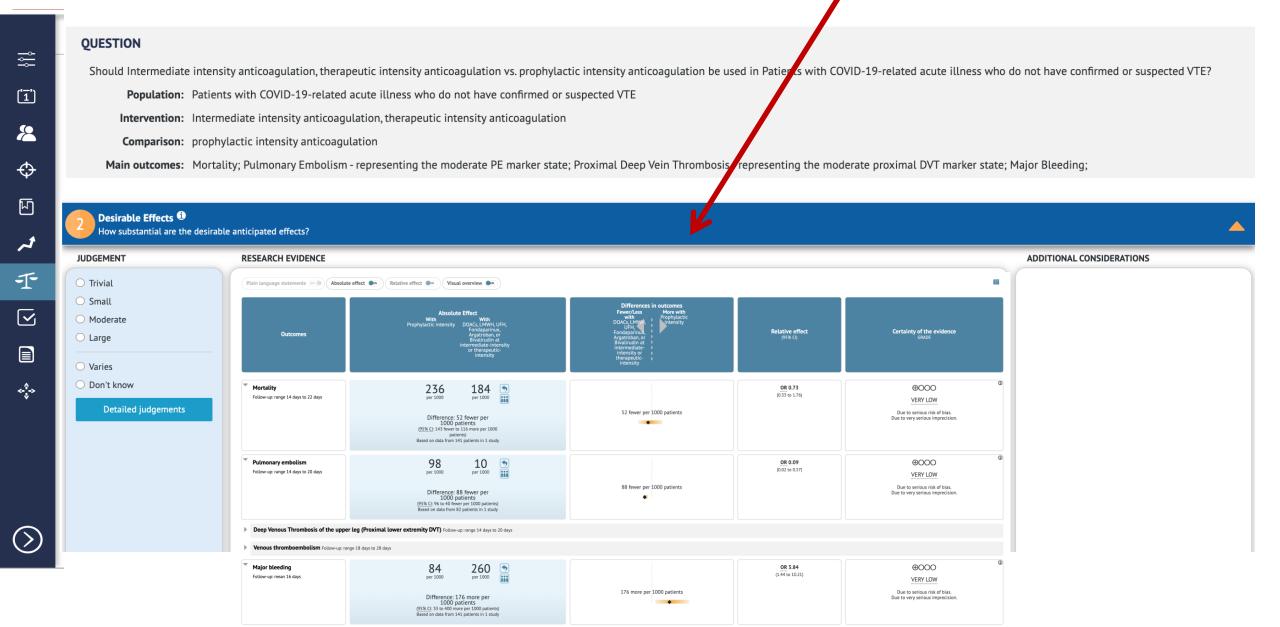
Departments of Health Research Methods. Evidence, and Impact (formerly "Clinical Epidemiology and Biostatistics") and of Medicine, McMaster University

Department of Epidemiology, Lazio Regional Health Service - ASL Roma 1 the GRADE Working Group

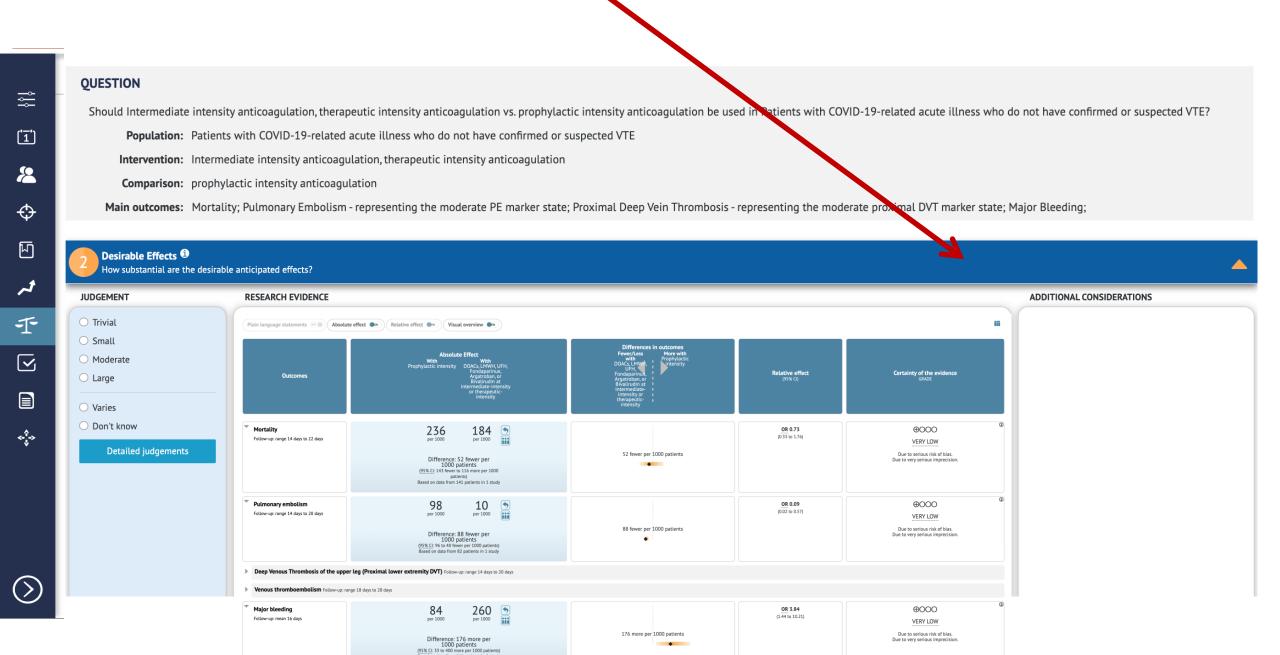
### Original EtD Framework (allows tailoring)



### Discuss evidence



### Add relevant considerations



### Make judgments



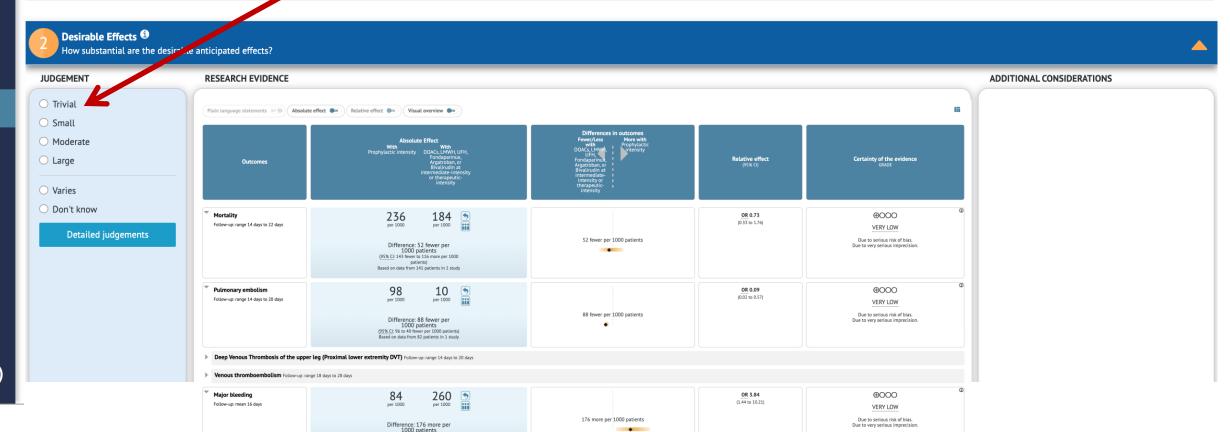
Should Intermediate intensity anticoagulation, therapeutic intensity anticoagulation be used in Patients with COVID-19-related acute illness who do not have confirmed or suspected VTE?

Population: Patients with COVID-19-related acute illness who do no may expected VTE

**Intervention:** Intermediate intensity anticoagulation, theraper acc intensity anticoagulation

Comparison: prophylactic intensity anticoagulation

Main outcomes: Mortality; Pulmonary Embolian - representing the moderate PE marker state; Proximal Deep Vein Thrombosis - representing the moderate proximal DVT marker state; Major Bleeding;























### Make judgments

### No conflicts of interest

### QUESTION

 $| \frac{1}{2} |$ 

**[1]** 

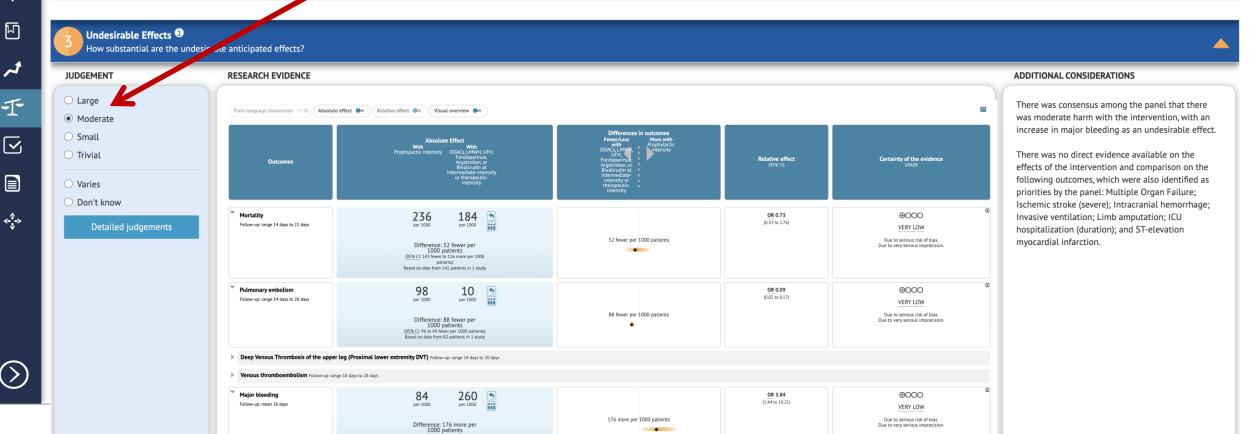
Should Intermediate intensity anticoagulation, therapeutic intensity anticoagulation prophylactic intensity anticoagulation be used in Patients

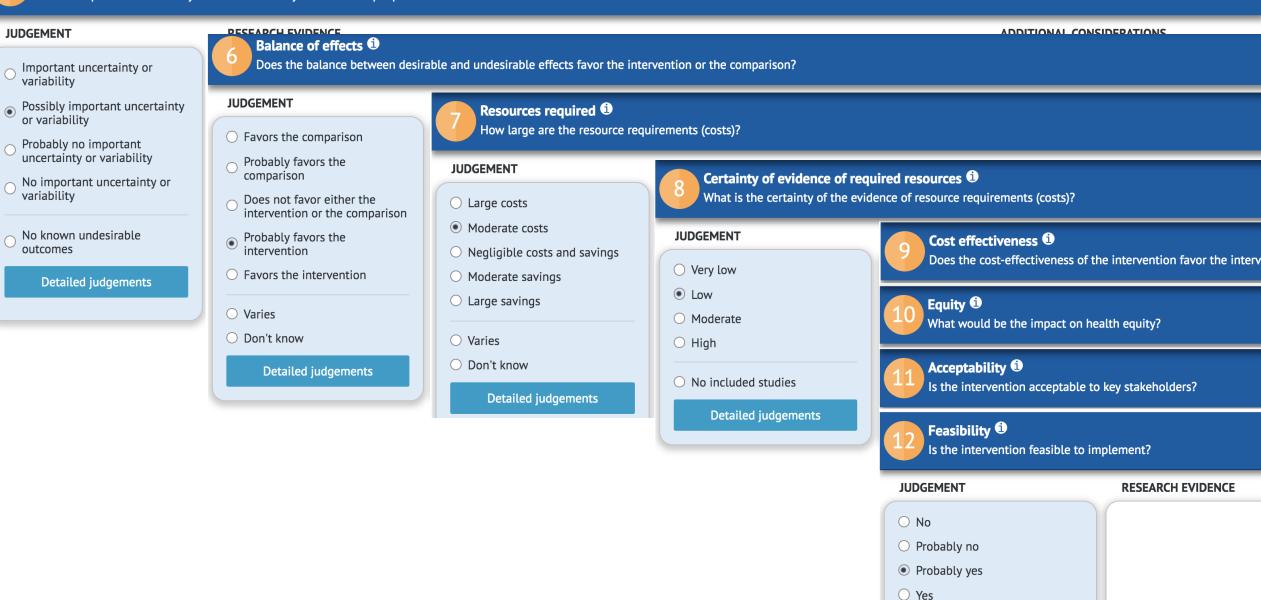
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Varies

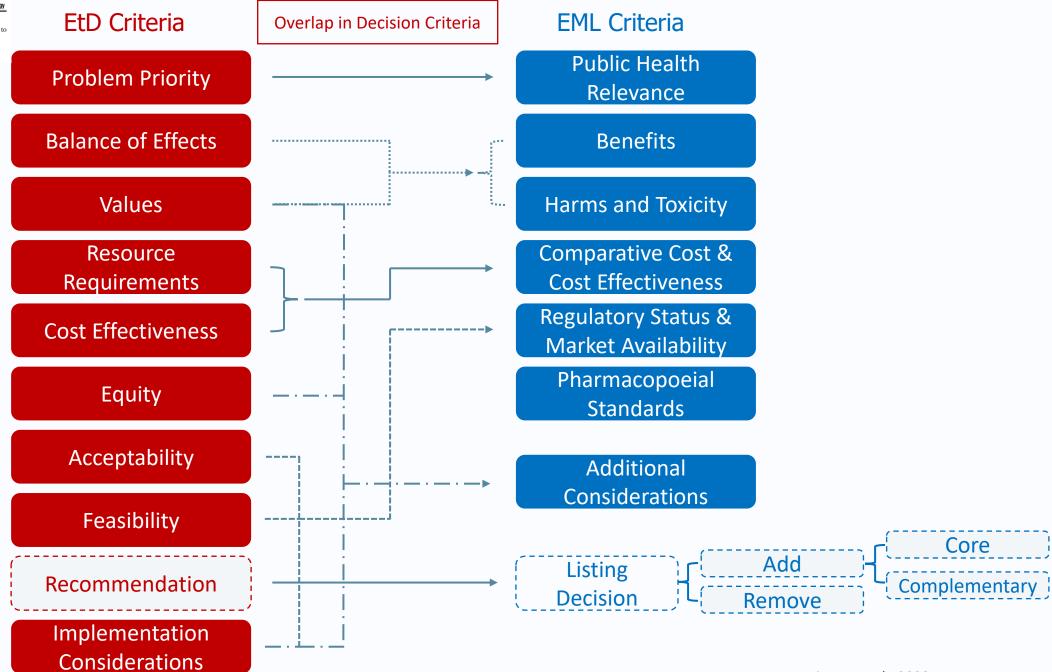
O Don't know





Journal of Clinical Epidemiology

OTHER GRADE PAPERS



Piggott et al., 2023

### **2021 EML Applications**

ESMO - WHO EML Submission 2020

Application for the inclusion of the anti-PD1 immune-checkpoint inhibitors in the WHO Model list of ESSENTIAL MEDICINES for the treatment of "non-oncogene- addicted" (EGFR, ALK, and ROS1 wild type) locally advanced and metastatic non-small cell lung cancer (NSCLC).

List of Contributors: George Pentheroudakis, MD PhD

Name of the focal point in WHO submitting or supporting the application

Andrè Ilbawi, WHO Department for Management of Noncommunicable Diseases, Disability, Violence and Injury Prevention (NVI).

Name of the organization(s) consulted and/or supporting the application

European Society for Medical Oncology (ESMO)

OESTION	
	immune-checkpoint inhibitors vs. chemotherapy be used for "non-oncogene- addicted" (EGFR, ALK, and ROS1 wild type) and metastatic non-small cell lung cancer (NSCLC)?
OPULATION:	"non-oncogene- addicted" (EGFR, ALK, and ROS1 wild type) locally advanced and metastatic non-small cell lung cancer (NSCLC)
NTERVENTION:	anti-PD1 immune-checkpoint inhibitors
OMPARISON:	chemotherapy
IAIN OUTCOMES:	Overall survival; Progression-free survival; Overall response rate; Adverse Events grade 3-4; Quality of Life;
ETTING:	
ERSPECTIVE:	
ACKGROUND:	
ONFLICT OF NTERESTS:	
SSESSMENT	
Problem sthe problem a priority?	

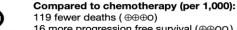
### ADDITIONAL CONSIDERATIONS RESEARCH EVIDENCE IUDGEMENT From Pentheroudakis MLEM Application Lung cancer is the most diagnosed and the first cause of death for cancer worldwide, estimating 2 million new cases and 1.7 related deaths in 2018, according to Global Cancer Observatory 2018 (5). Lung cancer is a highly lethal malignancy, with an economic impact estimated around \$8 billion productivity lost in the BRICS countries (6). Moreover, in the absence of a wide economic impact estimated around \$8 billion productivity lost in the BRICS countries (6). Moreover, in the absence of a video coverage of an effective screening programme in place on global scale, lung cancer diagnoses occur in advanced stages (i.e. III coverage) and a reflective screening programme in place on global scale, lung cancer diagnoses occur in advanced stages (ii.e. III related mortality in the United States and worldwide. Over 80% of the lung cancers are classified as NSCLC. Although trageless the stage of the places with molecularly druggables NSCLC (ii.e.g. epidermal growth therapies have redefined the threapeut landscape for patients with molecularly druggables NSCLC (ii.e.g. and programme growth of the place of the plac O Varies O Don't know **Desirable Effects** RESEARCH EVIDENCE IUDGEMENT ADDITIONAL CONSIDERATIONS From Dec 2020 Cochrane Review idence from original application. arge desirable effects for expression >50% with anti-PD1 immune-checkpoint



**Benefits** 

### **Anti-PD1 Inhibitors**

[nivolumab, pembrolizumab]



16 more progression free survival (⊕⊕00) 115 more overall response rate (⊕⊕00) 135 more higher Quality of Life (⊕⊕00)

No important uncertainty or variability in how people value the main outcomes



Harms

Balance

Equity

Lung Cancer

2 million cases/year



Compared to chemotherapy (per 1,000): 244 fewer grade 3/4 adverse events (⊕⊕00)

Favours Anti-PD1 Inhibitors vs chemotherapy



### Resources **Large Costs**

Drug costs alone over \$100,000 per patient.

Lung CA prevalent and therefore budget impact higher than for less common cancers.



### **Favours** chemotherapy

**ICER** approximately \$100,000 per QALY gained



### Reduced

If this drug is listed it would decrease health equity unless pricing decreases substantially



### **Probably Yes**

### These drugs are likely

acceptable to patients and healthcare providers due to effectiveness and less undesirable effects than alternative reaimens.

These drugs are likely not acceptable to decision-makers in most settings due to the cost.



### No

This intervention is feasible and already implemented in many high-income settings

Globally this intervention is not currently feasible across most settings

### GRADE interactive Evidence to Decision Frameworks





- **Team**
- 🗘 Scope
- References
- Prognosis
- T Comparisons
- Multi comparisons
- ✓ PanelVoice
- **Document sections**
- Dissemination

### Question

- Details PICO Subgroups
- Background and conflicts of interest

### **Assessment**

- Criteria
- Judgements
- Research evidence (HTA and Systematic Reviews)
- Additional considerations

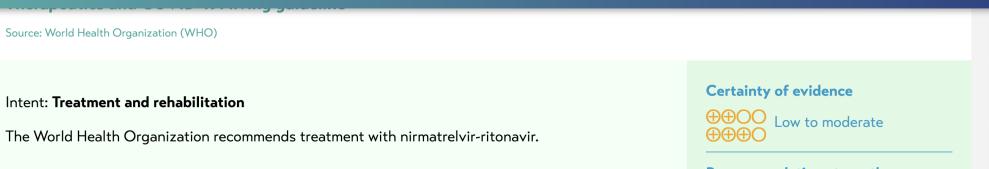
### **Conclusions**

- Type of decision recommendation
- Justification
- Implementation considerations monitoring and evaluation
- Research considerations

### **Presentation**

- Group meeting processes & informing coverage decisions
- Database of decision frameworks
- Decision Aids, apps

COVID19 Recommendations



**Recommendation strength** strong AGREE II score (i) Scope and purpose: 86.1% Rigor of development: 88.5% Editorial Independence: 91.7% Request for adolopment

Recommendation **Additional** information **Summary of** choices iSoF **EtD** Source of recommendation

Population/Health problem	Patients with non-severe COVID-19 at highest risk of hospitalization		
Intervention	Nirmatrelvir-ritonavir		
Links to WHO Model List of Essential Medicines	https://list.essentialmeds.org/?query=ritonavir	EML	
Relevant evidence from L·OVE platform	Relevant evidence from L·OVE platform	L‡VE	



### WHO-COVID19 Recommendations





### **WHO eTB Guidelines**

A database of WHO recommendations for TB prevention and care

Search in recommendations

0

This website provides access to the latest WHO recommendations on all aspects of tuberculosis prevention and care. The user can search, filter and cross-tabulate the recommendations through built-in functions.

For each individual recommendation one can also access key background information, such as the evidence summaries and the Guideline Development Group decisions underpinning it.



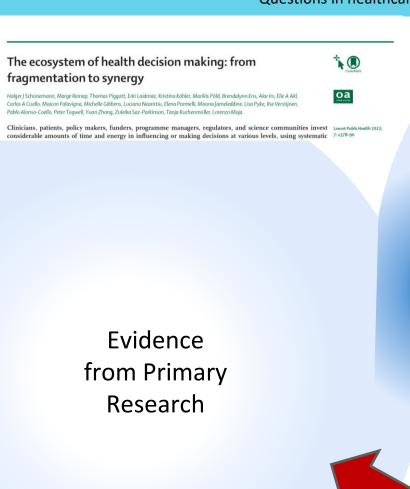
### Ledipasvir + sofosbuvir

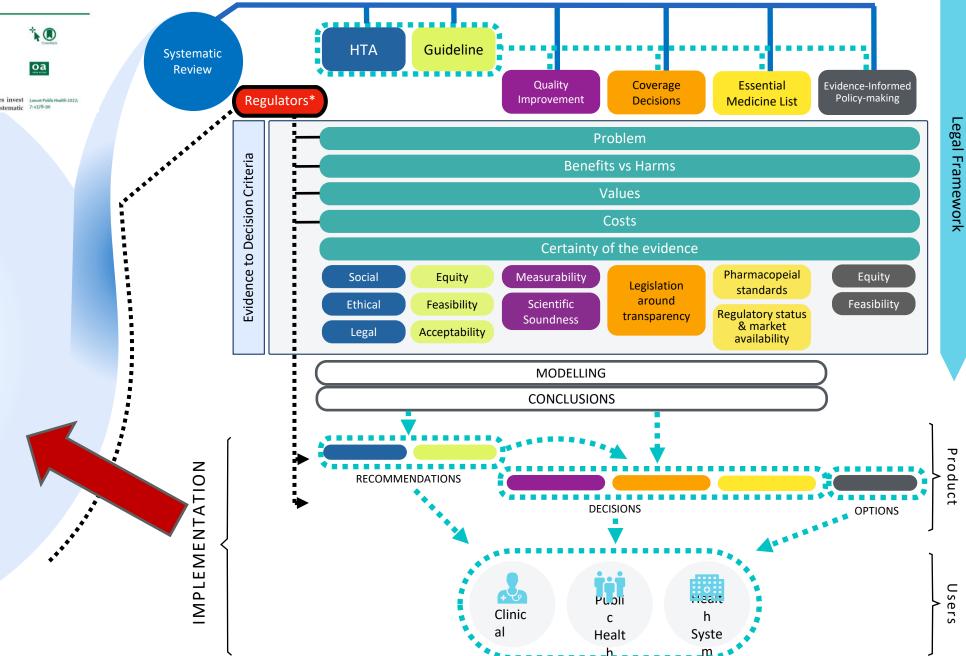


Essential medicine status 🗸

Section: 6. Anti-infective medicines > 6.4. Antiviral medicines > 6.4.4. Antihepatitis medicines > 6.4.4.2. Medicines for hepatitis C > 6.4.4.2.2. Medicines for hepatitis C > Non-pangenotypic direct-acting antiviral combinations

		ATC codes: J05AP51
Indication	Chronic hepatitis C ICD11 code: 1E91.1	
INN	Ledipasvir + sofosbuvir	
Medicine type	Chemical agent	
List type	Core	
Formulations	Oral > Solid: 90 mg + 400 mg tablet	
EML status history	First added in 2015 (TRS 994)	
Sex	All	
Age	Adolescents and adults	
Therapeutic alternatives	The recommendation is for this specific medicine	
Patent information	Read more about patents.	
Wikipedia	Ledipasvir + sofosbuvir	
DrugBank	Ledipasvir 🔄,	
	Sofosbuvir 🗹	





Beyond guidelines: Evidence ecosystem of health decision-making

### Key visions for enhancing EML transparency

- 1. Improve the quality and evaluation of applications → EtD framework like process for all applications, rapid updating, cost-considerations?
- 2. Is it time to re-assess 2001 criteria for decision making (EB109/8): missing equity and feasibility (availability)?
- 3. Work with medicine funders to align financing with EML decision-making?
- Move from comparative cost-effectiveness medication classes to affordability of medicines?
- 4. Strengthen the link with WHO guidelines and other norms and standards products → increase efficiency as there is much work to do
- 5. Work with the evidence-informed policy making to ensure essential medicine list decisions are translated into political priorities and policy decisions directly and indirectly
- 6. Improve dissemination and capacity building for both WHO and national EMLs

### **Summary**

## Little justification to do less than is demanded from guideline recommendations

- with regards to evidence to decision process, engagement and transparency to achieve integrity of the list
- consider the visions over the next days

### Thank you

Thomas Piggott, Marge Reinap, Erki Laidmäe, Kristina Köhler, Elie A. Akl, Carlos A. Cuello, Maicon Falavigna, Michelle Gibbens, Mouna Jameleddine, Tanja Kuchenmüller, Luciana Neamtiu, Elena Parmelli, Mariliis Pōld, Lisa Pyk, Ilse Verstijnen, Ray Zhang, Peter Tugwell, Benedikt Huttner, Lorenzo Moja

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### In the meantime...

Examples of synergy between different decision-making bodies taught us how to enhance related processes:

Estonia national guideline making conditional recommendation for DOACs in atrial fibrillation – cost too high for strong recommendation based on systematic review and HTA

Price negotiations with Estonian Health Insurance Fund – manufacturer lowering price  $\rightarrow$  strong recommendation

And, our repeat submission to the 2019 EML (directly based on our guideline with decision-making support) → Listing of DOACs, the evidence accumulated

- but did not change dramatically in terms of cost or need in LMIC

# dai: 10.1136/bmji2016 | BMJ 2016;35

### Different types of decisions

	Clinical recommendations— individual perspective	Clinical recommendations— population perspective	Coverage decisions	Health system and public health recommendations/decisions	Diagnostic, screening, and other tests*	
Priority of the problem			Is the pro	oblem a priority?		
Test accuracy		Not applic	cable		How accurate is the test?	
Benefits and harms			How substantial are the	desirable anticipated effects?		
			How substantial are the v	undesirable anticipated effects?		
Certainty of the evidence	What is the overall certainty of the evidence of effects?			What is the certainty of the evidence of:  - Test accuracy?  - Any critical or important direct benefits, adverse effects, or burden of the test?  - Effects of the management that is guided by the test results?  - Link between test results and management decisions?  - Effects of the test?		
Outcome importance	how much people value the main adverse effects and burden of the				Is there important uncertainty about or variability in how much people value the main outcomes, including adverse effects and burden of the test and downstream outcomes of clinical management that is guided by the test results?	
Balance	Does the balance between desirable and undesirable effects favour the intervention or the comparison?  Does the balance between desirable and undesirable effects favour the test or the comparison?					
Resource use	_	— How large are the resource requirements (costs)?				
	What is the certainty of the evidence of resource requirements (costs)?					
	Does the cost effectiveness of the intervention (the out-of-pocket cost relative to the net benefits) favour the intervention or the comparison?	Does the cost effectiveness of the intervention or the compar		Does the cost effectiveness of the option favour the option or the comparison?	Does the cost effectiveness of the test favour the test or the comparison?	
Equity	— What would be the impact on health equity?					
Acceptability	Is the intervention acceptable to patients, their care givers, and healthcare providers?	Is the intervention acceptable	e to key stakeholders?	Is the option acceptable to key stakeholders?	Is the test acceptable to key stakeholders?	
Feasibility	Is the intervention feasible for patients, their care givers, and healthcare providers?	Is the intervention feasil	ble to implement?	Is the option feasible to implement?	Is the test feasible to implement?	

RESEARCH METHODS AND REPORTING