



Developing Drugs for Rare Diseases: Patient Advocacy's Perspective

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An Advocacy Perspective

- Why develop drugs for Rare Disease?
- What is the thought process of advocacy around access?
- What is the public missing beyond the cost and headlines?
- Why should we think about this differently?
- Possible solutions? Next Steps?

Why Develop Drugs for Rare Diseases?

About 7,000 Distinct Rare Diseases Recognized Today

350 Million People Globally Are Fighting Rare Diseases

➤ **1 In 10 Americans Suffer From A Rare Disease, That's ~30M People**

Most Are Chronic And Many Are Progressive

➤ **Approximately 50% Affect Children & 30% Die Before The Age Of 5**

Only ~ 350 Have Identified Treatments

What is the thought process of advocacy around access?



First...

Advocacy Groups Are Not Created Equally

Each Rare Disease & Each Rare Disease Patient Community is Different

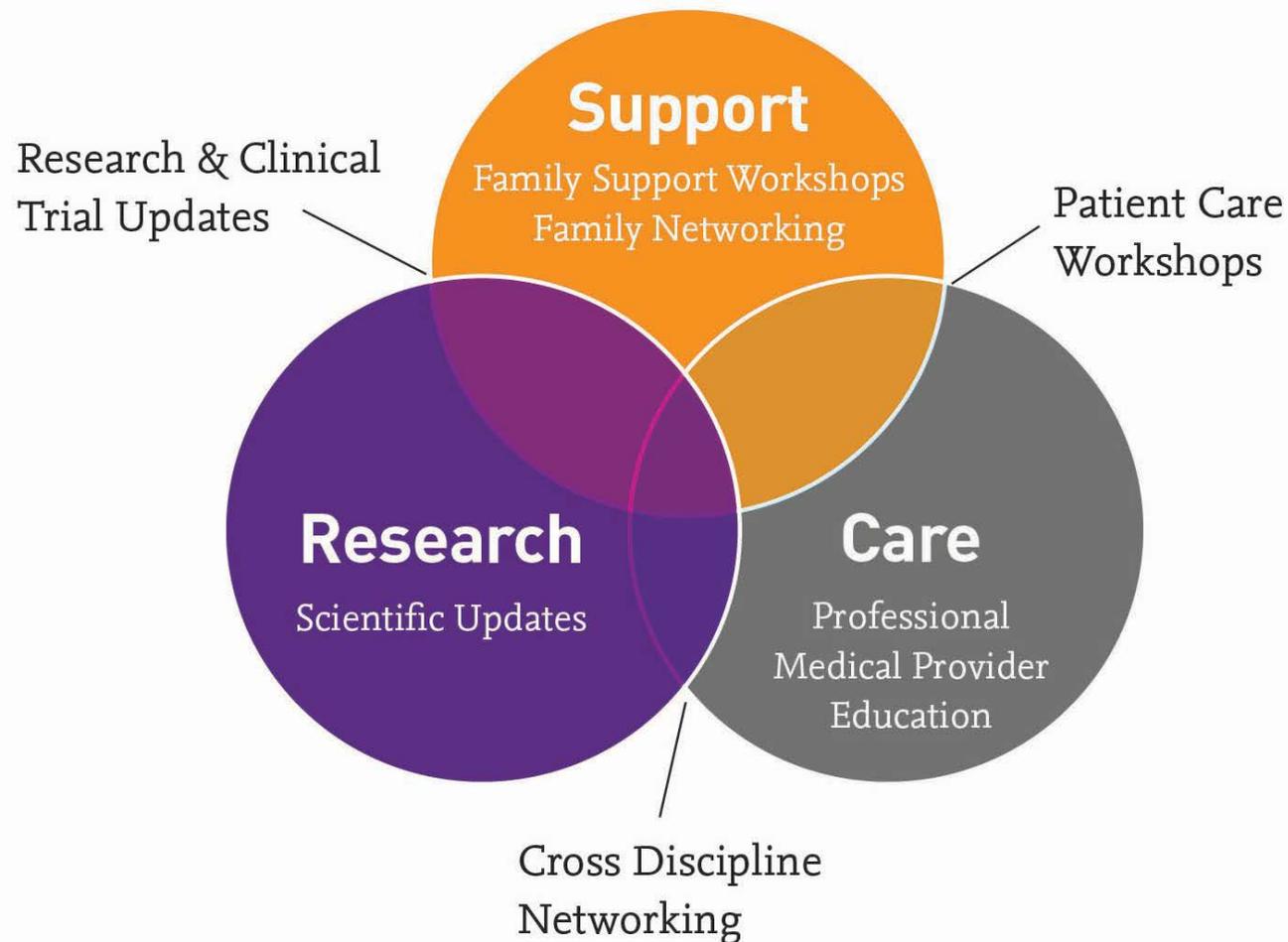
Therefore, each group must take into consideration

- Severity of Disease?
- Current treatment landscape and what treatments are available?
- What level of risk will they accept?

All of this drives the push for access



Advocacy's Role Is to Facilitate Access From Research to Commercialization



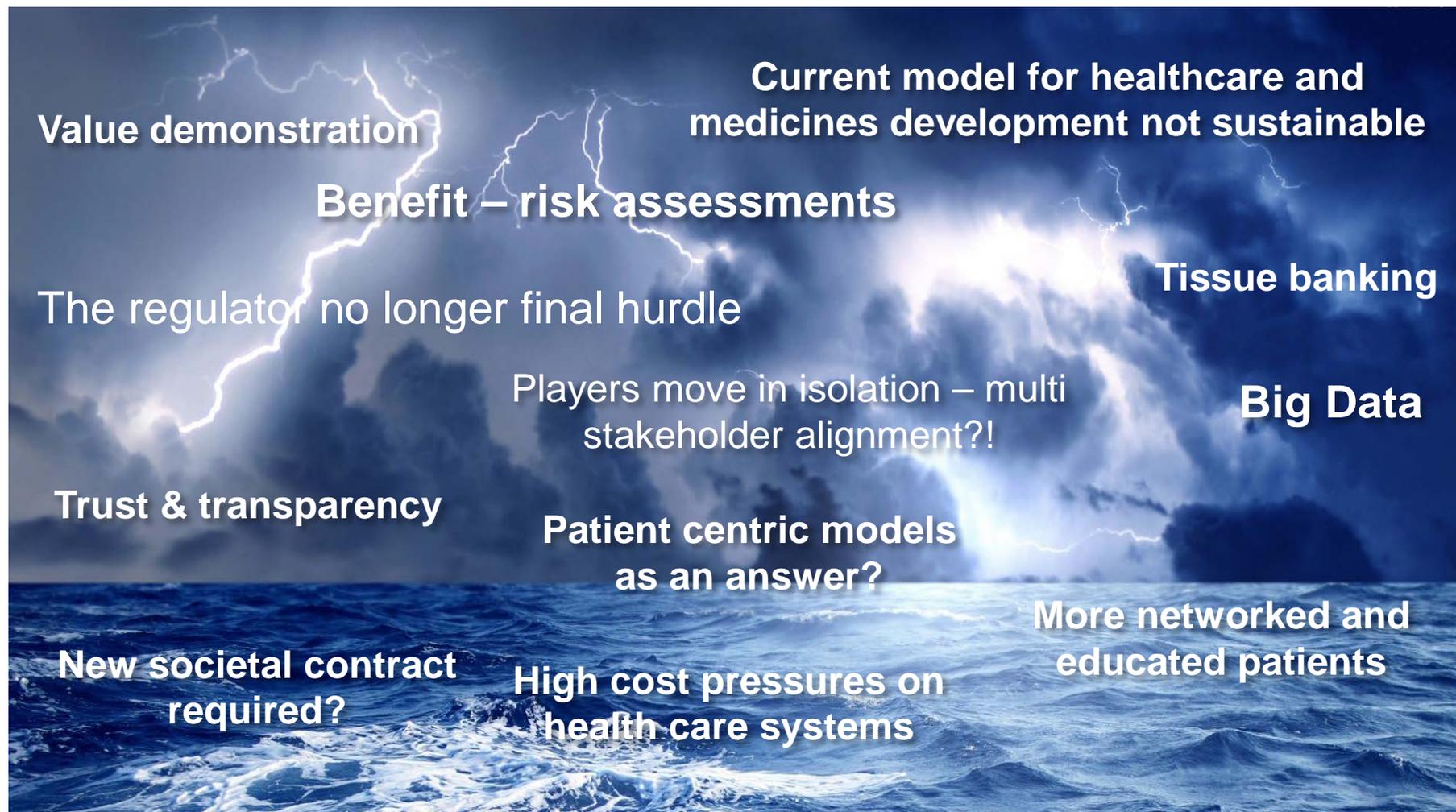
Facilitating Clinical Trials and Drug Development

- **Reduce Risks for Investment**
- **Support with Recruitment and Design**
- **New Trial Outcomes and Meaningful Endpoints**
- **Providing Patient Perspective to FDA**
 - **“Voices of the Patient Report”**
 - **Patient meetings**
 - **PFDD meeting**
- **Patient focus groups and surveys**
 - **Clinical trial participation/expectations/barriers**
 - **Meaningful benefit and Benefit/Risk**
 - **Impact on daily living**

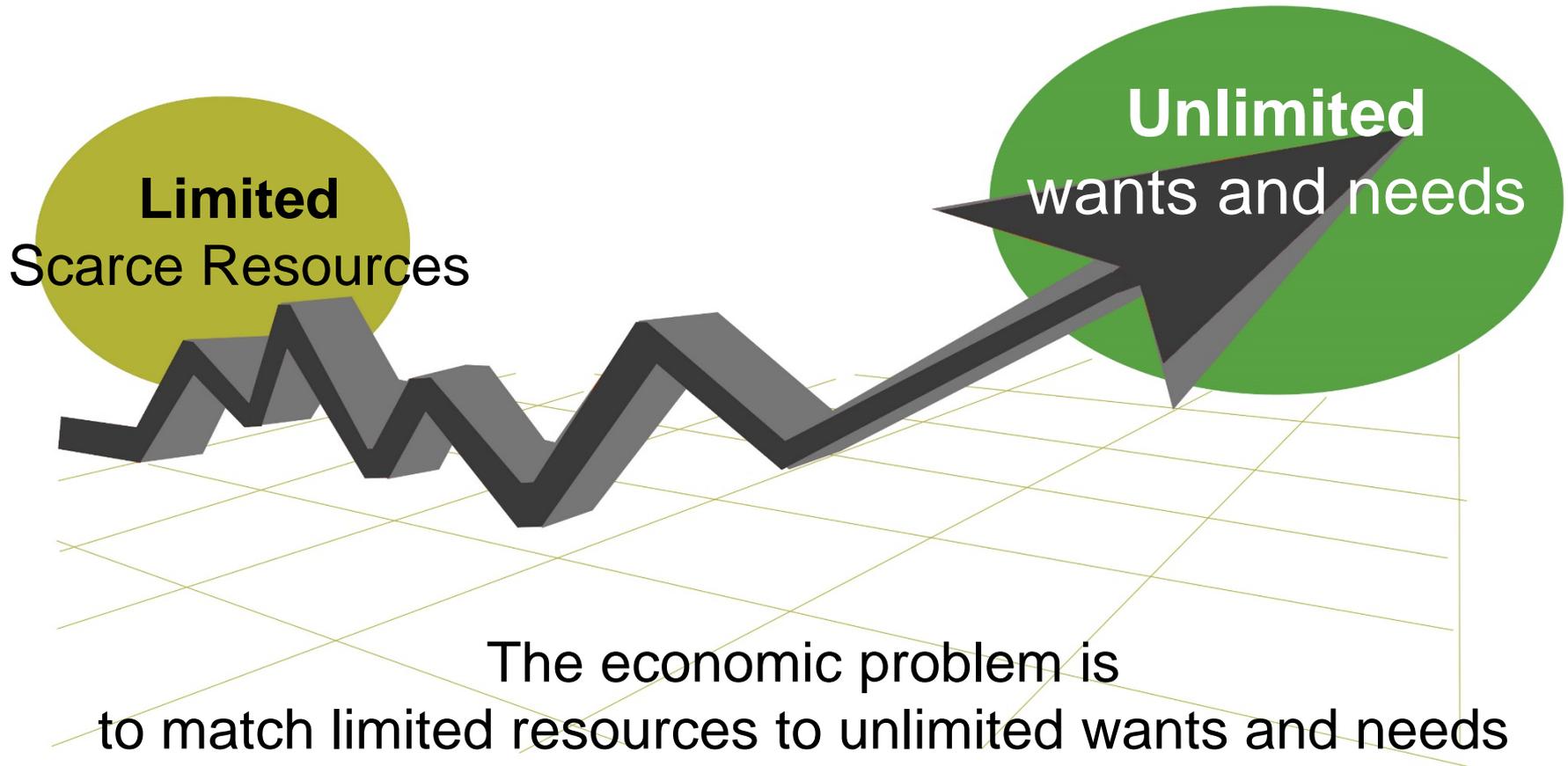
What is the public missing?



Perfect Storm



Resources



Access Is Not Price

- Access is the most important factor to a rare disease patients
- Most patients only get access to a drug once it has been FDA approved
- FDA starting use the regulatory flexibility to approve therapies quickly, because patients are waiting for access
- Approval doesn't always lead to access
 - Patients face challenging reimbursement hurdles to gain access to approved therapies



Navigating Reimbursement

- Price is still important to patients and patient advocacy groups, but price transparency and a clear understanding on how patients will get access is critical
- Most often it is the patient, family, and clinician that will take on the burden of reimbursement issues and appeals processes
- Example: Payer restrictions versus drug label restrictions
 - SPINRAZA was approved for the treatment of SMA, no type restrictions, yet payors imposed their own type restrictions and benefit timelines
 - Payers have limited disease understanding

What should we think about differently?



Role of Patient Led Foundations Across Drug Development



Valuable role in developing tools and support to accelerate drug development

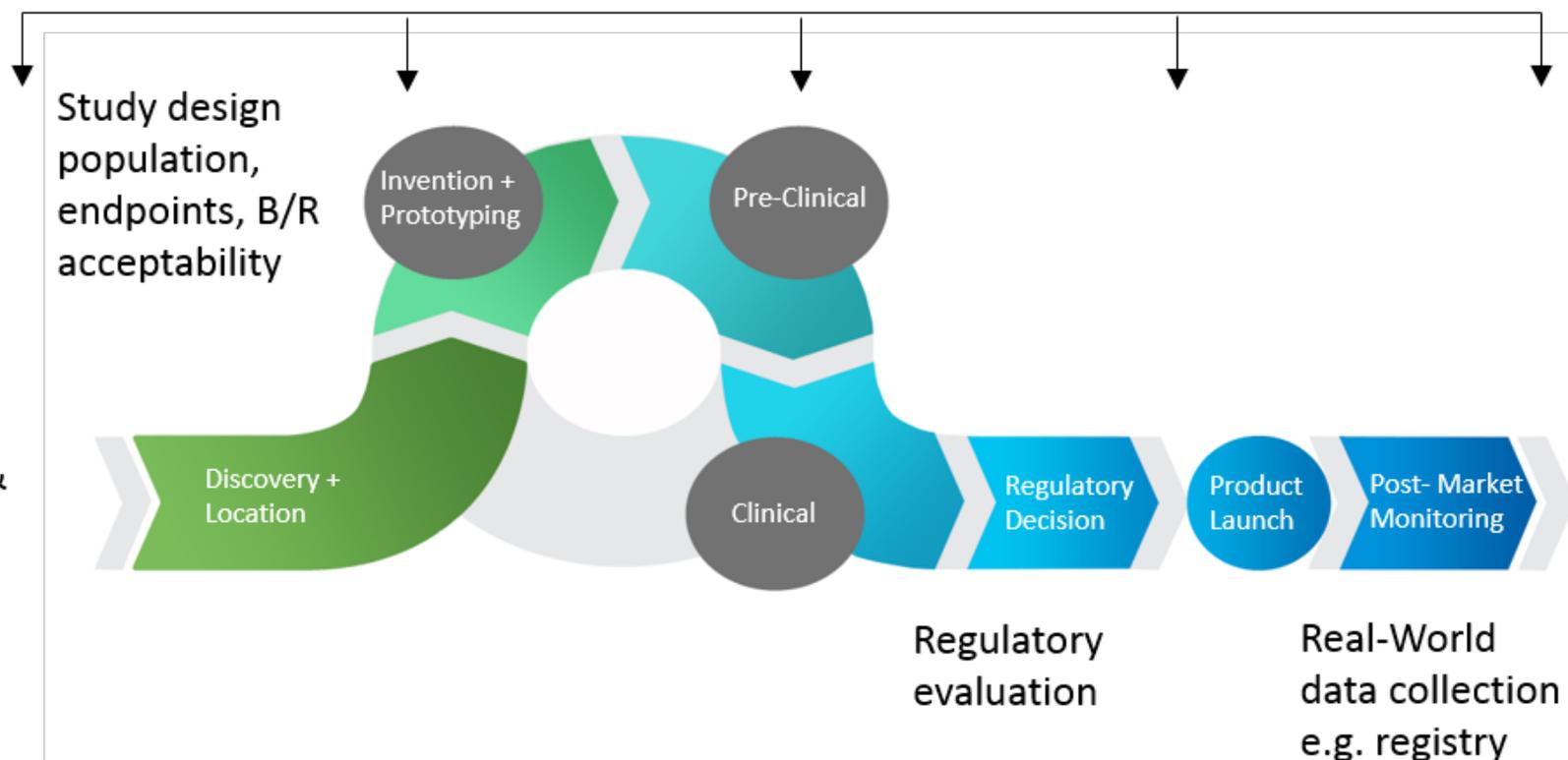


Reduce uncertainty over the benefit-risk- value

Role of Patient Led Foundations Across Drug Development

Patients are experts in their disease, and properly engaged can play a vital role in all stages of drug development

Embedding patient preference data at every stage



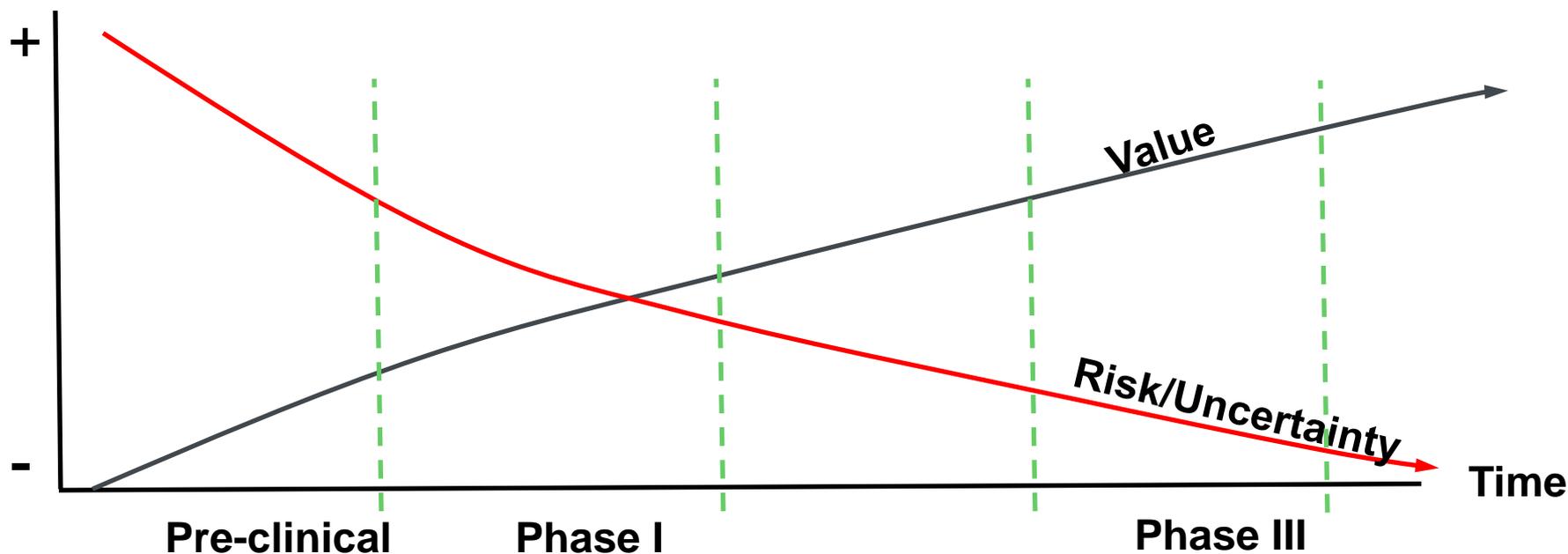
Unmet need, prioritization & Foundation support

Regulatory evaluation

Real-World data collection e.g. registry

Evidence Generation to Support Market Access

De-Risking & Improving Value



Better Research for Better Outcomes

Building Programs to Support Drug Development

Taking Advantage of Existing Opportunities With FDA

- Drug Development Round Table
- Guidance for Industry on Drug Development
- Biomarker Development
- Patient Focused Drug Development Meeting
- Patient Voice Publication



Supporting Payer Needs to Make Better Decisions About Coverage of Rare Disease Treatments

Creating A Value Proposition

- Disease impact and clinical benefit to patients needs to be strongly linked
 - Justify rationale for selected clinical endpoints and their relevance to patients
 - Long-term benefits clear
- Demonstrate that the price is reasonable given:
 - Small patient population
 - Severity of disease
 - Level of unmet need
 - Development costs
- Potential decrease in other costs due to better health and functioning
 - Less need for caregivers
 - Decrease in other medications
 - Ability to work

Possible Solutions?

Change the Approach





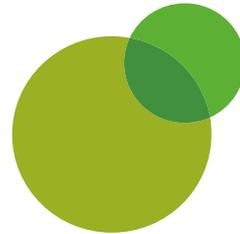
**Incorporate
the Patient
Perspective
from the
Beginning**

Start and End with the Patient in Mind



Strengthen
Advocacy
with Industry
Expertise:

Increase
Industry
Participation
in Research
Consortiums



amyloidosis
research
consortium



How do we Synchronize Expectations Across FDA, Payers and Industry

FDA: Payer Communication Task Force A step in the right direction?

About FDA

Home > About FDA > FDA Organization > Office of Medical Products and Tobacco > About the Center for Devices and Radiological Health > CDRH Innovation

CDRH Innovation

Payer Communication Task Force

Activities to Support Medical Device Innovators

Payer Communication Task Force

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- [Opportunities to Obtain Public Payer Input](#)
- [Parallel Review](#)
- [Public Payer Pre-Submission Participation](#)
- [Opportunities to Obtain Private Payer Input](#)
- [Stakeholder Engagement](#)

Background

CDRH established the Payer Communication Task Force to facilitate communication between device manufacturers and payers to potentially shorten the time between FDA approval or clearance and coverage decisions. By communicating earlier, manufacturers may design their clinical trials to produce the data required for regulatory approval or clearance and positive coverage determinations, which may expedite patient access.

Payers include public payers such as [Centers for Medicare & Medicaid Services \(CMS\)](#), private health plans, health technology assessment groups, and others who provide input into coverage and reimbursement decisions.

FDA's Center for Devices & Radiological Health (CDRH) evaluates the safety and effectiveness of medical devices for use in the U.S. Usually after FDA approval or clearance, other organizations—for example, public and private organizations that pay for health care (payers) and the professionals who provide health care (providers)—decide whether to cover, pay for, or use a device. Often, the data submitted by medical device manufacturers to demonstrate safety and effectiveness to the FDA may not include data needed by payers to make coverage determinations. As a result, after FDA approval or clearance, there may be a delay in coverage, payment and use decisions that may ultimately delay patient access to medical devices.

Opportunities to Obtain Public Payer Input

The opportunities for collaboration with a public payer, CMS, are outlined below. CDRH hopes to further expand the opportunities to include collaborations with other public payers in the future.

Parallel Review

Revolutionizing Medicine. Saving Lives.

