

Krakow, January 26, 2005
Updated: April 1, 2005

The authors of the idea and the document:
Krzysztof Landa, MD
Jacek Siwiec

Cooperation and the co-authors:
Magdalena Wladysiuk-Blicharz
Przemyslaw Rys
Robert Plisko

Peer Review System (PRS) in HTA

– option 1 should be treated only as preliminary proposition

The initial propositions for quality assurance in economic evaluations

The need for peer review in HTA has been expressed by many and for many years. It seems that CEESTAHC could play an organizational role in such process if agreed by the President and the Board.

It is proposed that CEESTAHC will be **managing** peer review of reports by HTA experts for users, but with explicit understanding that CEESTAHC takes no ownership of, or responsibility for, the single or consensual views¹ expressed by those **experts**.

It is believed that PRS:

- ◆ would allow for quality assurance in HTA – that would be of great help, especially for the countries introducing HTA to reimbursement policy such as new member states of EU (economic evaluations with biased outcomes and low quality hurt trust of politicians and society to the general idea; that is a serious obstacle to wide use of HTA in decision making);
- ◆ could become a mile stone in standardization and harmonization in the field of HTA - obviously variations would be taken into consideration but reaching consensus by reviewers and their close cooperation in groups or committees being changed would accelerate this process;
- ◆ could substantially strengthen international cooperation in HTA and the Society itself;
- ◆ could help courts around the world as the reviewers listed on the CEESTAHC website could be selected for court referees – Transparency Directive in EU requires all member states to introduce court jurisdiction over reimbursement decisions; it is probable that courts will require not only national experts but also abroad experts to judge on validity of economic evaluations attached to reimbursement applications; the courts could direct to CEESTAHC for help in finding experts active in peer review system;
- ◆ could be a substantial or even major source of Society's income;
- ◆ would become one of the major factors in regulation of HTA or economic evaluations “market”;
- ◆ other.

¹ Consensual view of 3 experts or single view of an expert developed in PRS and presented in writing will be called further on an “**opinion**”.

The three options for peer review have been proposed below (CEESTAHC could deal directly with the first two of the options but with both of them simultaneously):

OPTION 1 – OPEN PEER REVIEW (ONE CONSENSUAL OPINION IS GIVEN)

No.	Question	Answer
a.	What can be reviewed?	Any efficacy & safety analysis of medical technology (reviews, systematic reviews etc.), any cost or economic analysis on hard data or based on modeling.
b.	Who can apply for the peer review?	Anyone - any institution, any organization or any person.
c.	Is there a fee to be paid to CEESTAHC?	Yes, there is.
d.	What is the fee to be paid and how is it calculated?	<p>CEESTAHC collects fees for the management of the Peer Review System (PRS) due to a transparent pricelist.</p> <p style="text-align: center;">OR</p> <p>An applicant will pay a flat fee of 12.000 euro in gross. CEESTAHC receives 3.000 euro per review and each of 3 reviewers are paid a flat remuneration of 3.000 euro each for a single review. The reviewers are paid for their work, expenses associated with the review, reaching consensus and preparation of the consensual opinion. In case of disagreements to specific issues, a protocol of disagreement becomes a part of the opinion.</p> <p>15% discount will be given for organizational CEESTAHC members and 5% for individual CEESTAHC members. The discounts decrease the CEESTAHC mark-up.</p>
e.	What are requirements from applicant?	<p>An applicant will submit 4 full copies of the analysis in English with fulfilled application form directed to CEESTAHC Board. The applicant is responsible for collecting and submission of:</p> <ul style="list-style-type: none"> • full text copies of all primary clinical trials and secondary studies included in the analysis; if requested by the reviewers also full text copies of trials excluded from the analysis and at least a detailed list of trials excluded; • full search strategy or at least key words used in search for clinical trials as well as all investigated data bases with a date of the last search; • primary cost data used for calculations and all assumptions clearly stated; • models in electronic version with open formulas for calculations; • any other data or publications used in the analysis if requested by the reviewers. <p>If the above cannot be fulfilled by the applicant the reviewers will base their opinion on available material listing the limitations of the given opinion in this respect. The fee does not depend on fulfillment of the requirements from applicant and does not vary with stage of ability to cooperate by the applicant.</p> <p>Operating language is English.</p>

f.	When does review start and how long does it take?	<p>The review begins when the acceptance by the CEESTAHC Board is made, the 3 reviewers randomly selected (they become ad hoc Basic Review Committee [RBC]) and the fee for the review is received by CEESTAHC.</p> <p>Any review takes up to 6 weeks.</p>
g.	What does an opinion cover?	<p>General and some specific views on validity, complexity, completeness of analysis and its publication in full text. The reviewers are transparently signed under the consensual opinion.</p> <p>The opinion will not be structured, no template will be available at the launch of PRS and no standard procedures for review will be developed by CEESTAHC before the first 30 consensual opinions are collected.</p>
h.	Who is responsible for the given opinion?	Only the reviewers themselves.
i.	How can the opinion be used by the applicant?	<p>The applicant obtains copy rights to the consensual opinion given by the 3 reviewers. Therefore respecting authorship personal rights of the reviewers can publish the opinion in any legible way.</p> <p>There may not be CEESTAHC logo or any sentence in the opinion which could lead to a conclusion that CEESTAHC is responsible to any extent for the given consensual opinion. There may be stated that CEESTAHC organizes reviewers' work and runs the "open PRS" with the link to specific website of CEESTAHC.</p>
j.	Who can become a reviewer?	Any CEESTAHC member fulfilling the transparent requirements developed by CEESTAHC and one who is agreed by the CEESTAHC Board of Directors.
k.	Can one appeal against the opinion given?	Yes. One can apply to the Appellation Review Committee (ARC) selected and agreed by the CEESTAHC Board. ARC can be asked for its consensual opinion which is a separate one and should not be treated as supreme to the opinion of BRC. Members of ARC are responsible for the opinions given by them and CEESTAHC takes no responsibility for any part or whole of such opinions. Any potential further appellation could be obtained on a legal way.
l.	Who can appeal?	Anyone - any institution, any organization or any person; the applicants to BRC, authors or users of the analysis, producers or the ones who use technologies which the analysis refers to.
m.	What is the appellation process, appellation fee and how long does appellation take?	<ul style="list-style-type: none"> The applicant to BRC may submit the fulfilled appellation application form to the CEESTAHC Board. The applicant appellation is free of charge in this case. Any other may submit the fulfilled appellation application form to the CEESTAHC Board as well. The fee of 12.000 euros is charged in this case. <p>Timing and appellation process is decided and organized by the CEESTAHC Board specifically to the case but takes not more than 6 months.</p>

n.	Are the members of ARC paid for their work and how?	ARCs are organized by CEESTAHC specifically for each possible case. ARC members may be paid for their work and expenses by CEESTAHC on specific to the case basis.
o.	How to apply for review?	The fulfilled application form with the full text copies of analysis and reference materials should be submitted to the CEESTAHC Board of Directors.
p.	Who makes a decision and accepts analysis for review?	The Peer Review Committee of CEESTAHC Board of Directors does.
q.	Who manages review?	The CEESTAHC Secretariat does. BRC and ARC members manage their work individually on their own.
r.	Who selects 3 reviewers and how?	The Peer Review Committee of CEESTAHC Board of Directors selects 3 BRC members randomly from the list of available reviewers from the official list of CEESTAHC open PRS reviewers. The selection is secret until the consensual opinion is ready.
s.	Will the work of reviewers be assessed, by whom and how? Can a reviewer loose the "CEESTAHC license"?	The Peer Review Committee of CEESTAHC Board of Directors will assess the consensual opinions and the BRC and ARC members' performance at least once a year. In case any reviewer is not available for a relatively long time or does not work satisfactory in subjective opinion of the Peer Review Committee such individual's name is cancelled from the list of BRC reviewers.

OPTION 2 – MUTUAL PEER REVIEW (3 SINGLE OPINIONS ARE GIVEN)

No.	Question	Answer
a.	What can be reviewed?	Any efficacy & safety analysis of medical technology (reviews, systematic reviews etc.), any cost or economic analysis on hard data or based on modeling.
b.	Who can apply for the peer review?	Only institutional members of CEESTAHC.
c.	Is there a fee to be paid to CEESTAHC?	No, there is not – apart from the fact that an applicant should pay an annual institutional membership fee to CEESTAHC.
d.	What are requirements from applicant?	<p>An applicant will submit 4 full copies of the analysis in English with fulfilled application form directed to CEESTAHC Board. The applicant is responsible for collecting and submission of:</p> <ul style="list-style-type: none"> • full text copies of all primary clinical trials and secondary studies included in the analysis; if requested by the reviewers also full text copies of trials excluded from the analysis and at least a detailed list of trials excluded; • full search strategy or at least key words used in search for clinical trials as well as all investigated data bases with a date of the last search; • primary cost data used for calculations and all assumptions clearly stated; • models in electronic version with open formulas for calculations; • any other data or publications used in the analysis if requested by the reviewers. <p>If the above cannot be fulfilled by the applicant the reviewers will base their opinions on available material listing the limitations of the given opinions in this respect.</p> <p>Operating language is English.</p>
e.	When does review start and how long does it take?	<p>The review begins when the acceptance by the CEESTAHC Board is made, the 3 reviewers randomly selected (they become ad hoc Basic Review Group [RBG]) and the CEESTAHC institutional membership status of the applicant is confirmed.</p> <p>Any review takes up to 6 weeks.</p>
f.	What do 3 single opinions cover?	<p>In mutual peer review option 3 single and signed opinions are being given to the applicant.</p> <p>Each opinion covers general and some specific views on validity, complexity, completeness of analysis and its publication in full text. The reviewers are transparently signed under each single opinion. (Their names are not known to the applicant before the review has been ended).</p> <p>The opinions will not be structured, no template will be available at the launch of PRS and no standard procedures for review will be developed by CEESTAHC before the first 90 single opinions are collected.</p>

g.	Who is responsible for the given opinions?	Only and each reviewer is responsible for the given opinion himself.
h.	How can the single opinions be used by the applicant?	<p>The applicant obtains copy rights to the three single opinions given by the 3 reviewers of basic review group. Therefore respecting authorship personal rights of the reviewers the applicant can publish the opinion in any legible way.</p> <p>There may not be CEESTAHC logo or any sentence in the opinion which could lead to a conclusion that CEESTAHC is responsible to any extent for any of given single opinions. There may be stated that CEESTAHC organizes reviewers' work and runs the "mutual PRS" with the link to the specific website of CEESTAHC.</p>
i.	Who can become a reviewer?	<p>Any expert delegated by the institutional CEESTAHC member fulfilling the transparent requirements developed by CEESTAHC and the one who is agreed by the CEESTAHC Board of Directors.</p> <p>Anyone who wants to become a mutual reviewer will need to agree to work on the reviews for free. In return for 3 reviews done by the mutual reviewer (or each of 3 reviews done by 2 or 3 reviewers from the given institution) each institutional CEESTAHC member will get the right for one free of charge application to mutual peer review. In other words for 3 single opinions by the reviewer (or reviewers) from an institutional CEESTAHC member, this institution will be granted the right to have one analysis reviewed free of charge in mutual PRS.</p>
j.	Can one appeal against the single opinion given?	<p>Yes. In the first line the applicant applies for the consensual opinion of the 3 reviewers in the Basic Review Group (BRG). This consensual opinion is superior to all the single opinions given. In case the consensual opinion is reached by BRG, the single opinions given formerly may not be published publicly (the applicant agrees on such regulation beforehand).</p> <p>If the applicant is still not satisfied. One can apply to the Appellation Review Committee (ARC) selected and agreed by the CEESTAHC Board. ARC can be asked for its consensual opinion which is a separate one but should not be treated as supreme to the consensual opinion of BRG.</p> <p>Members of ARC are responsible for the opinions given by them and CEESTAHC takes no responsibility for any part or whole of such opinions. Any potential further appellation could be obtained on a legal way.</p>
k.	Who can appeal?	Anyone - any institution, any organization or any person; the applicants to BRG, authors or users of the analysis, producers or the ones who use technologies which the analysis refers to.

l.	What is the appellation process, appellation fee and how long does the appellation take?	<ul style="list-style-type: none"> The applicant to BRG may submit the fulfilled appellation application form to the CEESTAHC Board. The applicant appellation is free of charge in this case. The consensual opinion of BRG is given up to 4 weeks from the date of appellation form submission. Any other may submit the fulfilled appellation application form to the CEESTAHC Board as well. The fee of 12.000 euros is charged in this case. Timing and appellation process is decided and organized by the CEESTAHC Board specifically to the case but takes not more than 6 months.
m.	Are the members of ARC paid for their work and how?	ARCs are organized by CEESTAHC specifically for each possible case. ARC members may be paid for their work and expenses by CEESTAHC on specific to the case basis.
n.	How to apply for review?	The fulfilled application form with the full text copies of analysis and reference materials should be submitted to the CEESTAHC Board of Directors.
o.	Who makes a decision and accepts analysis for review?	The Peer Review Committee of CEESTAHC Board of Directors does.
p.	Who manages review?	The CEESTAHC Secretariat does. BRG and ARC members manage their work individually on their own.
q.	Who selects 3 reviewers and how?	The Peer Review Committee of CEESTAHC Board of Directors selects 3 BRC members randomly from the list of available reviewers from the official list of CEESTAHC mutual PRS reviewers. The selection is secret until the final single opinions are ready.
r.	Will the work of reviewers be assessed, by whom and how? Can a reviewer loose the "CEESTAHC license"?	The Peer Review Committee of CEESTAHC Board of Directors will assess single and consensual opinions of BRGs as well as ARCs members' performance at least once a year. In case any reviewer is not available for a relatively long time, does not work satisfactory in subjective opinion of the Peer Review Committee or his institution lost CEESTAHC membership, such individual's name is cancelled from the list of mutual reviewers.

OPTION 3

As both lists of experts (open and mutual reviewers lists) agreed by CEESTAHC to participate in PRS will be transparently placed on the CEESTAHC website, anyone is free to contact any of these experts asking for their private opinions. CEESTAHC does not interfere such activities, takes no responsibility of the opinions and charges no fees in this respect.

Potential

It is assumed that there are 700 HTA reports developed by HTA Agencies around the world. These reports include efficacy & safety analyses based on systematic review and economic evaluations (due to Drummond's definition) as well. There should be about 2-3 times more systematic reviews and economic evaluations done around the world by individuals, private companies, universities etc.

It is assumed that average cost of open review for the applicant would be about 12.000 euro (which seems to be a reasonable and affordable price). There would be 3 randomly selected experts reviewing each evaluation. They would be paid about 3.000 euro per review (including preparation of the review reports and written consensual opinion). About 3.000 euro per each review and certification would be the income of Society (minus costs of appellation process).

Mutual PRS would substantially rise institutional membership in CEESTAHC and therefore its annual income. That would strengthen the Society both in respect to membership (high participation in Annual Meetings; presentations of high quality studies [preference in abstracts selections]; stronger inside Society bonds among members) as well as financially.

If the Society earnings become true, CEESTAHC could become a patron of HTA. CEESTAHC could select topics for HTA and call for bids – that would accelerate use and development of HTA reports and influence health care systems in other ways. Having enough resources CEESTAHC could select topics due to importance to health of humanity and deal with vital problems of use of resources for health care interventions. PRS could become an important factor of globalization in HTA.

Who could become a basic reviewer?

Peer-reviewers ought to:

- ◆ be agreed by CEESTAHC Board
- ◆ have documented experience in HTA (minimum 20 full HTA reports or systematic reviews as co-authors at least)
- ◆ have been active in the field of EBM / HTA for at least 5 years
- ◆ have knowledge of guidelines for HTA and systematic review
- ◆ have HTA and EBM teaching experience at university level

Summary

Most probably it is possible to build the effective peer-review system in 6 months. There are at least several reasons of success of such review and quality control system. The most important reason is simply the lack of and need for such system. There is a substantial number of "HTA" reports, "not-really-systematic" biased reviews and pharmacoeconomic studies with serious pitfalls which can influence health care policy and business. There is necessity to form a comprehensive and objective system of quality assurance because the results of HTA documents, efficacy & safety as well as economic studies concern strictly human life and health. Introduction of PRS within CEESTAHC could also strengthen influence of the Society and participation in the Policy Forum substantially. Potential behind

the idea of PRS could be tremendous, it seems that sooner or later some organizations or institutions might develop similar system – the demand is there already.

Commentary:

The above “broad” proposition with 3 options should be treated as preliminary – especially in respect to option 1. Option 3 could be easily followed when at least few experts are ready to be listed. Option 2 – also described in a separate document – could be enforced when at least 3 partners are interested in the mutual recognition or review system.

HTA is rooted in both evidence and politics but scientific approach dominates if decisions are to be made on rational. HTA reports and economic analyses in general cover recommendations on efficacy, safety and cost-effectiveness based on evidence of a certain grade of validity. Values and priorities may be covered in HTA reports but also may not be reflected in the documents. From my limited experience I see that politicians or decision-makers do not have problems with assessments of values or priorities as well as adjusting the priorities and values while making decisions based on scientific part of HTA reports. Politicians or decision-makers they have problems with assessment of validity and comprehensiveness of economic evaluations – they need help in assessment of the scientific part of economic evaluations. Potential users of HTA are reluctant to rely on economic analyses in decision-making process mostly because they do not know if they can trust them – they do not know if the review was really systematic, if all the relevant treatment or diagnostic options were taken into consideration, what quality data on costs is presented, if the methods of cost data collection and comprehensiveness of cost evaluation from a given perspective is fair etc.

The above might not be a problem in some countries (in most of them it is a problem) and the reports of most HTA agencies do not require external quality assurance – they can be trusted. On the other hand there are more economic evaluations developed around the world by private sector, individuals and universities than the HTA governmental agencies. I also noticed that in general the quality of analyses produced in private or university sector is lower than those of HTA agencies. Peer review system (PRS) could not only diminish or even eliminate the use of poor quality economic evaluations by decision-makers but improve performance on out-of-HTA-agencies market of efficacy and economic studies. Poor quality manipulated analyses lower trust to economic evaluations in general – that results in diminished use of economic evaluations in reimbursement decision-making in many countries and raise suspicion among politicians to HTA (that might also have influence on trust to HTA reports developed by HTA agencies).

Taking care of good quality in the market of broadly understood HTA is a must for all fair players – poor quality analyses spoil the market. Quality assurance system in this respect would greatly strengthen trust to and use of economic studies by politicians and decision-makers. Larger availability of good quality economic evaluations could speed up the process of systemic transformation to evidence-based health care for benefit of the patients and the tax payers. Actions taken in quality assurance could also accelerate “evolution” in respect to standardization of HTA methods and harmonization of terminology within HTA society.

It is believed that sooner or later there will be a certification, peer review and/or quality assurance international system as it is needed for evidence-based health care – it happens in all scientific fields where expertise requires high knowledge and skills; it is not revealing.

Anyway the submitted document should be considered only as a proposition which obviously might not be followed.