



Canadian Skin Patient Alliance
Alliance canadienne des
patients en dermatologie

for patients, by patients

February 14, 2020

Douglas Clark

Executive Director
Patented Medicine Prices Review Board
333 Laurier Avenue West, Suite 1400
Ottawa, Ontario K1P 1C1

Dear Mr. Clark,

On behalf of the Canadian Skin Patient Alliance (CSPA), thank you for the opportunity to share our input regarding the draft Patented Medicine Prices Review Board (PMPRB) Draft Guidelines.

The CSPA is a national not-for-profit organization dedicated to advocating, educating and supporting Canadians living with skin diseases, conditions and traumas. Our mission is to promote skin health and improve the quality of life of Canadians living with skin disorders. We advocate for the best treatment options for all skin patients; we educate on a variety of issues affecting skin patients; and we support our Affiliate Member organizations who in turn support people living with burns and disorders such as alopecia, scleroderma, melanoma and psoriasis.

The CSPA supports the objective of the Draft Guidelines to make more treatments accessible to patients in Canada and support the sustainability of the health system on which we rely. However, the CSPA is concerned about the potential impacts of this specific approach to lowering drug prices on patients in Canada. As members of the Best Medicines Coalition and the Better Pharmacare Coalition, the CSPA also supports their submissions to this consultation.

On behalf of our community, we must impress upon you that many new medicines are becoming available to better treat a diversity of skin disorders, including psoriasis and atopic dermatitis (eczema), through clinical trials and as marketed drugs. For some, these important innovations are bringing us closer to a cure. It is vital to our community that new treatments will continue to be available to skin patients in Canada to improve our health outcomes and quality of life. This objective must be held at the centre of the implementation of the new drug pricing regime in Canada by the PMPRB.

The Draft Guidelines as proposed do not appear to value new therapies in the same way as is currently done by health technology assessment (HTA) bodies like the Canadian Agency for Drugs and Technologies in Health (CADTH) and the Institut national d'excellence en santé et en services sociaux (INESSS). Of note, there is no explicit consideration of the therapeutic value of a patented medicine, which was a key factor in the previous evaluation process used by the PMPRB. The patient community has invested a lot of resources into helping shape a process that incorporates important patient input into HTAs. We urge the PMPRB to ensure that these contextual factors are incorporated into the pharmaco-economic assessment under new guidelines.

As the PMPRB moves forward to develop and implement new guidelines, we wish to emphasize the importance of ongoing and meaningful patient engagement in this regulatory process as it is implemented and evaluated to ensure that patients' health outcomes and quality of life are not diminished.

Thank you for considering our input.

Sincerely,

Rachael Manion
Executive Director
Canadian Skin Patient Alliance