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Grand, T.S. [orcid.org/0000-0002-7058-916X](https://orcid.org/0000-0002-7058-916X), Ren, S. [orcid.org/0000-0003-3568-7124](https://orcid.org/0000-0003-3568-7124), Hall, J. [orcid.org/0000-0001-8024-5427](https://orcid.org/0000-0001-8024-5427) et al. (3 more authors) (2024) Issues, challenges and opportunities for economic evaluations of orphan drugs in rare diseases: an umbrella review. *PharmacoEconomics*, 42 (6). pp. 619-631. ISSN 1170-7690

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1 Title: Issues, challenges and opportunities for economic evaluation of orphan drugs in rare diseases: an umbrella  
2 review

3 Running heading: Issues, challenges and opportunities for economic evaluation of orphan drugs in rare diseases

4

5 Tobias Sydendal Grand<sup>1,3,\*</sup>, Shijie Ren<sup>1</sup>, James Hall<sup>2</sup>, Daniel Oudin Åström<sup>3</sup>, Stephane Regnier<sup>3</sup>, and Praveen  
6 Thokala<sup>1</sup>

7 <sup>1</sup>University of Sheffield, Sheffield Centre for Health and Related Research (SCHARR)

8 30 Regent St, Sheffield City Centre, Sheffield S1 4DA, United Kingdom

9 <sup>2</sup>University of Birmingham, Institute of Applied Health Research, Health Economics Unit

10 Edgbaston, Birmingham B15 2TT, United Kingdom

11 <sup>3</sup>Lundbeck A/S

12 Otiliavej 9, 2500 Copenhagen, Denmark

13

14 \*Corresponding Author: [tsgrand1@sheffield.ac.uk](mailto:tsgrand1@sheffield.ac.uk); ORCID: 0000-0002-7058-916X

15

16 Shije Ren: [s.ren@sheffield.ac.uk](mailto:s.ren@sheffield.ac.uk); ORCID: 0000-0003-3568-7124

17 James Hall: [j.a.hall@bham.ac.uk](mailto:j.a.hall@bham.ac.uk); ORCID: 0000-0001-8024-5427

18 Daniel Åström: [AAST@lundbeck.com](mailto:AAST@lundbeck.com); ORCID: 0000-0003-4742-417X

19 Stephane Regnier: [STRR@lundbeck.com](mailto:STRR@lundbeck.com); ORCID: 0000-0002-1994-4648

20 Praveen Thokala: [p.thokala@sheffield.ac.uk](mailto:p.thokala@sheffield.ac.uk); ORCID: 0000-0003-4122-2366

21

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25 The PROSPERO administration team confirmed that this review was not eligible for registration. Instead, the  
26 protocol for this umbrella review was made available in preprint before data extraction commenced [1]. It is  
27 available from University of Sheffield's online data repository. License: CC BY 4.0; DOI:

28 10.15131/shef.data.23390060; URL: [Issues, challenges and opportunities for economic evaluation of orphan  
29 drugs: an umbrella review protocol \(shef.ac.uk\)](https://www.sheffield.ac.uk/data-repository/23390060).

## 30 Abstract

### 31 Background and objectives

32 There are significant challenges when obtaining clinical and economic evidence for health technology  
33 assessment of rare diseases. Many of them have been highlighted in previous systematic reviews but they have  
34 not been summarised in a comprehensive manner. For all stakeholders working with rare diseases, it is  
35 important to be aware and understand these issues. The objective of this review is to identify the main  
36 challenges for the economic evaluation of orphan drugs in rare diseases.

### 37 Methods

38 An umbrella review of systematic reviews of economic studies concerned with orphan and ultra-orphan drugs  
39 was conducted. Studies that were not systematic reviews, or on advanced therapeutic medicinal products  
40 (ATMPs), personalised medicines or other interventions that were not considered orphan drugs were excluded.  
41 The database searches included publications from 2010 – 2023, and were conducted in MEDLINE, EMBASE  
42 and the Cochrane library using filters for systematic reviews, and economic evaluations and models. These  
43 filters were combined with search terms for rare diseases and orphan drugs. A hand search supplemented the  
44 literature searches. The findings were reported by a compliant Preferred Reporting Items for Systematic  
45 Reviews and Meta-Analyses (PRISMA) flow diagram.

### 46 Results

47 282 records were identified from the literature searches, of which 64 were duplicates, whereas 5 reviews were  
48 identified from the hand search. A total of 36 reviews were included after screening against inclusion / exclusion  
49 criteria, 35 from literature and 1 from hand searching. Of those studies 1, 27, and 8 were low, moderate, and  
50 high quality, respectively. The reviews highlight the scarcity of evidence for health-economic parameters. For  
51 example, clinical effectiveness, costs, quality of life, and natural history of disease. Health-economic  
52 evaluations such as cost-effectiveness and budget-impact analyses were scarce, and generally low to moderate  
53 quality. The causes were limited health-economic parameters, together with publications bias, especially for  
54 cost-effectiveness analyses.

### 55 Discussion

56 The results highlighted issues around a considerable paucity of evidence for economic evaluation and few cost-  
57 effectiveness analyses, supporting the notion that paucity of evidence makes economic evaluation of rare  
58 diseases more challenging compared to more prevalent diseases. Furthermore, we provide recommendations for  
59 more sustainable approaches in economic evaluation of rare diseases.

## 60 Key points for decision makers

61 Point 1: This umbrella review provides a comprehensive overview of current issues for economic evaluation of  
62 orphan drugs in rare diseases.

63 Point 2: For economic evaluation of rare diseases there is a paucity of evidence and pronounced publication  
64 bias, as a cause, few cost-effectiveness analyses exist for orphan drugs.

65 Point 3: Stakeholders working with rare diseases can improve their work by following recommendations  
66 outlined in this umbrella review e.g., using comprehensive and flexible cost-effectiveness models.

67

## 68 1. Background

69 The term orphan drug is recommended by the International Society for Pharmacoeconomics and Outcomes  
70 Research (ISPOR) when a drug is indicated for the treatment of rare diseases with a prevalence threshold of 40  
71 to 50 patients per 100,000 people [2]. The United States (US) Orphan Drug Act of 1983 and the European  
72 Orphan Regulation (No 141/2000) have provided drug manufacturers with research incentives for rare diseases  
73 [3, 4]. They are widely regarded as successful and have led to an increase in orphan-drug designations [5-7]. For  
74 example, in the US, the number of orphan designations more than quadrupled from the 1990s to 2010s [8].

75 Before the introduction of incentives, there was a widely held view that manufacturers should be rewarded for  
76 orphan-drug development, which in exchange, meant that they could claim prices that ensured profitability.  
77 Although drug prices were high, the impact on healthcare budgets was negligible because of few marketed  
78 orphan drugs, and patients to benefit from them [9]. The situation has now changed because of the policy-  
79 induced surge in orphan drugs, and both policymakers and researchers are attempting to find sustainable  
80 solutions to the issue of reimbursement [9, 10].

81 The fundamental aim of clinical trials is regulatory approval, which involves a risk-benefit evaluation that  
82 should answer whether the benefit of an intervention outweighs the risk [11]. It is difficult to obtain high quality  
83 trial data when investigating rare diseases. For example, it may be hard to recruit enough trial participants, hard  
84 endpoints may be missing and including placebo arms in clinical trials may be unethical [12, 13]. However,  
85 these challenges are often magnified when it comes to health technology assessment (HTA), where the aim is a  
86 systematic assessment of both clinical and cost effectiveness [14]. These challenges lead to high uncertainty for  
87 cost-effectiveness analyses and along with their high prices result in many orphan drugs not being recommended  
88 for reimbursement [12, 13].

89 Multiple authors have described economic-evaluation challenges for rare diseases, focusing on various aspects  
90 such as the decision-analytic-modelling component of economic evaluations. Some of the most influential  
91 papers, based on number of citations, are from 2018 [9, 12, 13]. However, the literature is diverse, with  
92 researchers and policymakers looking for ways to alleviate the challenges for economic evaluation of orphan  
93 drugs [15, 16]. Recent events include the introduction of the innovative medicines fund in the United Kingdom  
94 which facilitates collection of additional data for promising orphan drugs or living HTA which is the concept of  
95 continuous updating of economic models [17, 18]. The existing reviews are limited in terms of their ability to  
96 synthesise the most recent policy, economic and clinical developments, because they have been superseded by  
97 recent developments. Consequently, the issues, challenges, and opportunities associated with the economic  
98 evaluation of orphan drugs have not been summarised comprehensively. As a result, an umbrella review that  
99 focus on the challenges for economic evaluation of rare diseases is warranted.

## 100 2. Methods

101 Scoping searches helped inform the literature searches [1]. They confirmed that the surge in orphan drugs had  
102 resulted in a growing and disparate field of literature. Ultimately, the decision to conduct an umbrella review  
103 was made, which in this case, was deemed as an appropriate solution. Umbrella reviews aim to synthesise  
104 systematic reviews, with or without meta-analyses, and have been described as a natural option to handle  
105 increases in systematic reviews to provide summary of broad topic areas [19]. Previously, this approach proved  
106 useful in similar situations, where fields of research expanded rapidly, and consequently, resulted in a diffuse  
107 body of literature [20-22].

### 108 2.1. Research Objectives

109 This research was informed by a modified version of the Setting, Perspective, Interest, Comparison, Evaluation  
110 (SPICE) framework [23]. The perspective component was omitted because all perspectives were considered  
111 relevant. When applying the framework with its parameters in brackets, e.g., [Setting]. The research question  
112 became: in health-economic-research settings [Setting] are there any issues and challenges [Evaluation] for the  
113 economic evaluation of orphan drugs in rare diseases [Interest], which apply less to other drugs [Comparison]?

## 114 2.2. Literature searches

115 The most relevant databases for the umbrella review were Medical Literature Analysis and Retrieval System  
116 Online (MEDLINE), Cochrane, and Excerpta Medica Database (EMBASE). Thus, during January 2023,  
117 MEDLINE and EMBASE were accessed through the Ovid platform and Cochrane independently through its  
118 website. For both MEDLINE and EMBASE search filters for economic evaluation and models, and systematic  
119 reviews were sourced from the Canadian Agency for Drugs and Technologies in Health (CADTH) and Scottish  
120 Intercollegiate Guidelines Network (SIGN) databases, respectively [24-26]. These filters were combined with  
121 search terms for orphan drugs and rare diseases. Eligibility criteria, scoping and literature searches are available  
122 from Online Resource 1 - 3, respectively.

123 As recommended by Booth and colleagues, a hand search of references and bibliographies of papers from the  
124 review was conducted [27]. Followed by a verification process where it was checked if any known and relevant  
125 papers were missing from the review.

## 126 2.3. Data-collection process

127 Titles and abstracts were screened by two independent researchers against the inclusion and exclusion criteria.  
128 Discrepancies were discussed until consensus was reached. The papers that met the inclusion criteria, after  
129 screening of title and abstract, were further subjected to full screening. Papers were also excluded at full  
130 screening if they were deemed as containing insufficient information to allow for meaningful data collection, for  
131 example abstracts. The data-collection process was divided into three steps: summary of characteristics, critical  
132 appraisal, and data extraction.

### 133 2.3.1. Summary of characteristics

134 An extraction table captured summary characteristics recommended for umbrella reviews: citations details, type  
135 of review, objectives, date range of database searching, number of studies, rating by the Joanna Briggs Institute  
136 (JBI) checklist and themes [19].

### 137 2.3.2. Critical appraisal

138 For critical appraisal, the JBI critical-appraisal checklist was used. This checklist is recommended by the  
139 umbrella review methodology working group for critical appraisal of systematic reviews [19]. The checklist  
140 contains 11 questions that were used to critically appraise the reviews [28]. For this tool, there is high degree of  
141 freedom for deciding on a scoring system for inclusion or exclusion of papers. To avoid missing any  
142 information, it was decided not to exclude any papers based on their scores. The reviews were divided into three  
143 levels according to their quality scores: 8 – 11 (high quality), 4 – 7 (moderate quality) and 0 – 3 (low quality)  
144 [29, 30].

### 145 2.3.3. Data extraction

146 The included reviews were carefully assessed with the aim of identifying broader themes that pertain to  
147 economic evaluation of orphan drugs. These challenges were extracted and tabulated according to their themes,  
148 based on an approach previously used to extract modelling challenges for rare diseases [12].

## 149 3. Results

### 150 3.1. Literature search and study selection

151 The study selection is illustrated by a Preferred Reporting Items for Systematic Reviews and Meta-Analyses  
152 (PRISMA) flow diagram in Figure 1. The number of identified records was 282. They were retrieved from the  
153 following databases: EMBASE (n = 211), MEDLINE (n = 67) and Cochrane Library (n = 4). A total of 64  
154 duplicate records were removed. Moreover, 172 records were excluded during screening of abstract and title,  
155 which left 46 studies for full screening. Of those, 11 were excluded due to them not containing components for  
156 economic evaluations (n = 5) or systematic reviews (n = 4), or because they were abstracts (n = 2). Overall, 35  
157 reviews from the database searches were deemed eligible for inclusion. Tables 1 - 3 in Online Resource 3 list  
158 the literature search results.

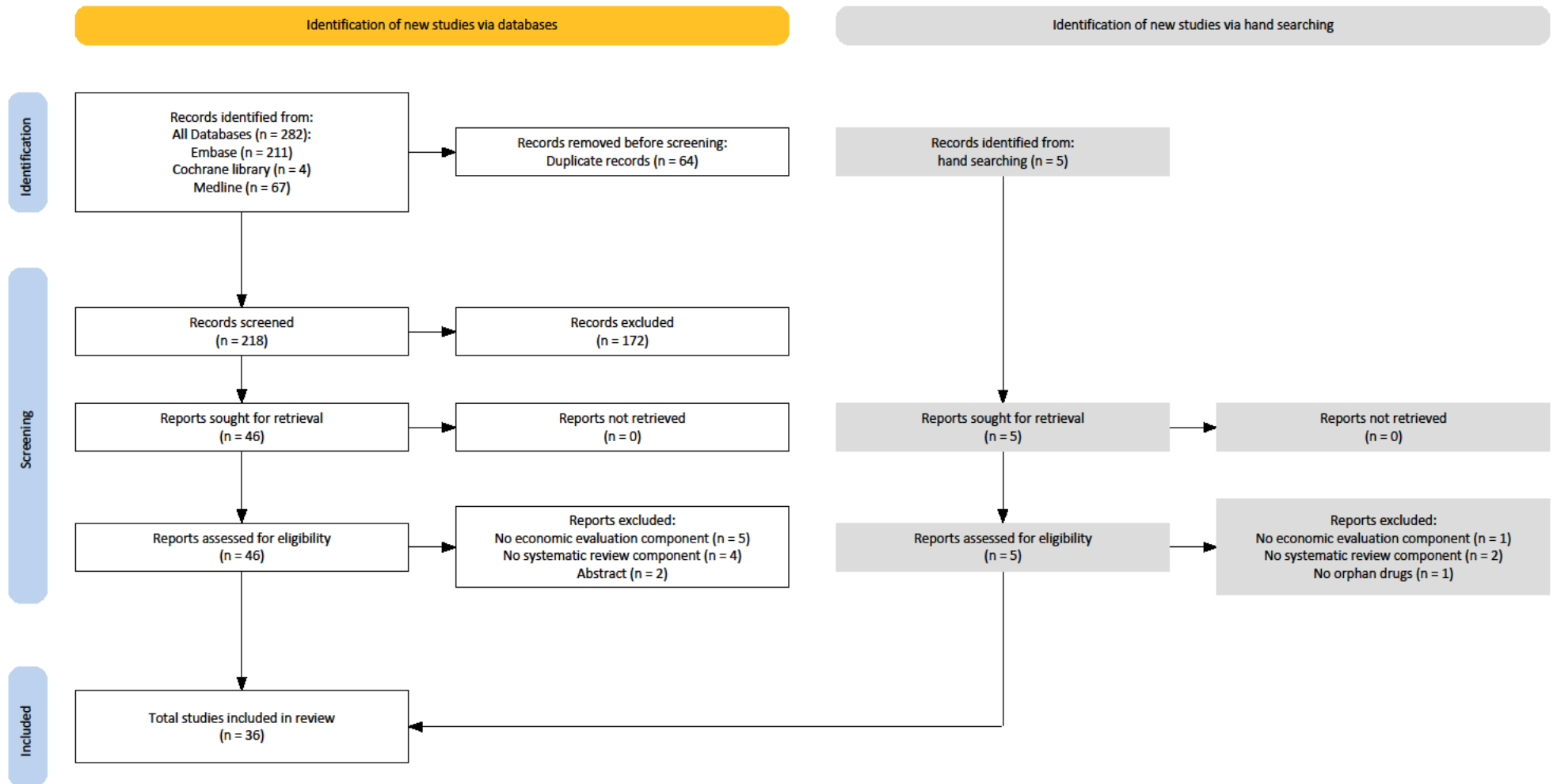
159 The hand search yielded five papers, of which four were excluded for the following reasons: no component of  
160 economic evaluations (n = 1) or systematic reviews (n = 2), and for not being concerned with orphan drugs (n =

161 1). It meant that one paper was carried forward from the hand search, which brought the total number of eligible  
162 reviews to 36. Table 1 in Online Resource 4 lists papers included for full screening.

### 163 3.2. Study characteristics

164 A two-step approach was used to determine if studies could qualify as systematic reviews. Firstly, a SIGN  
165 search filter for systematic reviews was used, which is a pre-tested search strategy that identify the higher  
166 quality evidence from vast amounts of literature indexed in a medical database. Secondly, eligibility was  
167 assessed, and consensus obtained between first and second reviewer on their inclusion. Using this approach, two  
168 scoping reviews were included because the methods were sufficiently systematic [31, 32]. Similarly, a study  
169 described their approach as a series of targeted literature reviews, which was also sufficiently systematic for  
170 inclusion [12]. The number of records included in the systematic reviews varied between 2 and 338. Table 2 in  
171 Online Resource 4 provides a summary of study characteristics.

172 Fig.1 PRISMA flow diagram



174        **3.3. Critical appraisal**

175        One study had low quality [31]. The highest frequency was found in the category of moderate quality, which comprised 27 studies [12, 32-57], whereas eight studies were  
176        rated as having high quality [58-65]. Table 3 in Online Resource 4 includes scores for each individual JBI checklist question across all studies, which showed that most  
177        studies (n = 35) obtained points from question 4, which was: were the sources and resources used to search for studies adequate? Question 8 was not widely applicable and  
178        was fulfilled by the least studies (n = 4). Question 8 was: were the methods used to combine studies appropriate? Critical appraisal methods used in individual systematic  
179        reviews were assessed by question 5: Were the criteria for appraising studies appropriate? 14 studies included appropriate criteria for critical appraisal, whereas in 13 studies  
180        it was unclear whether they did, 7 studies did not, and for 2 studies the question was not applicable.

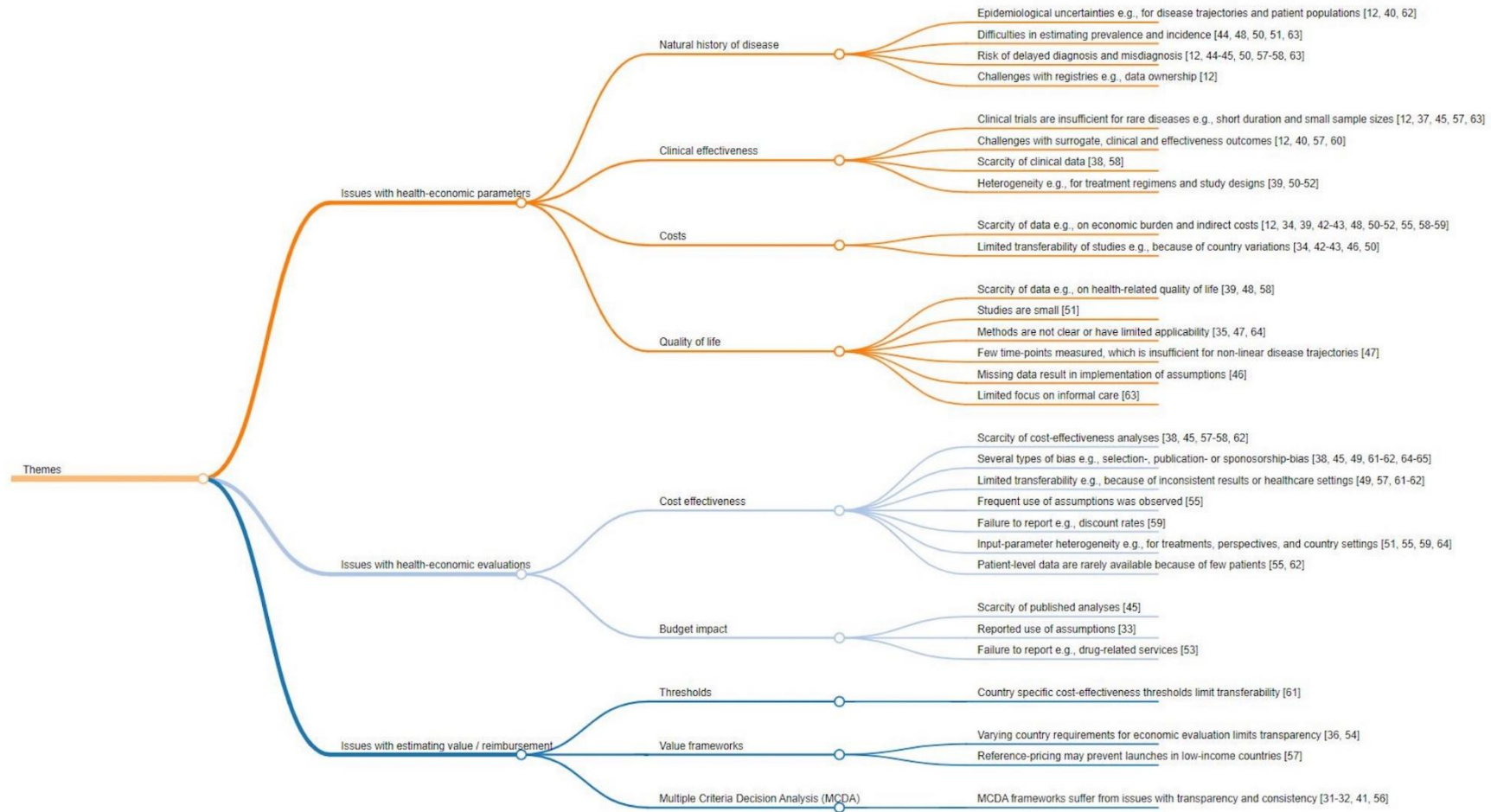
181

182        **3.4. Data extraction**

183        The systematic reviews were divided into two categories: those which considered a specific rare disease (13 studies) and those which considered multiple rare diseases (23  
184        studies). As shown in Figure 2, three broad themes were identified: issues with health-economic parameters, issues with health-economic evaluations, and issues with  
185        estimating value / reimbursement, with subtopics further developed for each theme. For issues with health-economic parameters, the subtopics were natural history of disease,  
186        clinical effectiveness, costs, quality of life. For issues with health-economic evaluations, the subtopics were cost effectiveness and budget impact. For issues with estimating  
187        value or reimbursement, the subtopics were thresholds, value frameworks and multiple criteria decision analysis (MCDA). A repository of all extracted data on issues for  
188        economic evaluation of rare diseases is available in Table 1 in Online Resource 5.



189 Fig. 2 Data extraction themes, sub-topics and findings



### 3.5. Issues with health-economic parameters

#### 3.5.1. Natural history of disease

Rare diseases often progress slowly or are chronic by nature, which make clinical trials insufficient as they tend to have short durations [12, 62]. The non-existence or limited number of studies which include data on prevalence and incidence further magnify issues [44, 48, 51]. Moreover, clinical experts are few and private practitioners may only encounter few rare-disease cases, which make them difficult to diagnose, and expert advice on rare diseases might not be easy to find [12, 44, 45, 57]. Delayed diagnosis and misdiagnosis make it difficult to define treatment-eligible cohorts [45, 50, 51, 58].

To summarise, economic evaluation is challenging e.g., for long-term modelling, because of missing data on natural history of disease or unknown rare-disease trajectories [40]. Although, registries can alleviate data issues, they may suffer from challenges such as diverging disease and diagnostic codes, data ownership, and missing comparator data [12, 48, 50].

#### 3.5.2. Clinical effectiveness

Whilst clinical trials are common sources for effectiveness data in economic evaluation, appropriate clinical evidence is not always available for this purpose [57, 58]. Moreover, clinical trials may suffer from short durations, small sample sizes, premature termination, inadequate power, missing data, or missing control arms e.g., for ethical reasons [12, 37, 45, 47, 57]. In addition, published long-term studies providing post-marketing data on safety and efficacy are rarely available [37, 38].

Other challenges are missing treatment guidelines, data to predict treatment responses, concerns on the patient relevance and use of surrogate endpoints [40, 50, 52, 60, 63]. Comparator data are essential for economic evaluation, but might be missing for rare diseases, and if they are available there might not be consensus on the use of treatment regimens or treatment eligibility of patients, which result in heterogeneity across studies [39, 48, 50, 51]. A review found that studies reporting clinical evidence for orphan drugs had low to moderate quality, and none of them had high quality [60].

#### 3.5.3. Costs

Cost-of-illness or burden-of-disease studies are scarce in rare diseases [12, 34, 39, 42, 43, 48, 52, 55]. Of those studies available, most are retrospective and only a small proportion of studies report indirect, non-medical, or informal-care costs. [12, 34, 51, 58, 59]. Aggregated primary data are rarely available, hence, studies tend to report patient-reported, claims, or registry data [42].

It is complicated to transfer cost-of-illness results between different rare-disease settings due to differences in study design, methods, and results. For example, one study estimated lost productivity without following recommendations for handling uncertainty [42]. A multitude of factors influence transferability such as data sources, geographical perspective, nomenclature, assumptions, discount rates, unit costs, treatment guidelines and value frameworks [34, 43, 46, 50].

#### 3.5.4. Quality of life

Quality-of-life studies in rare disease are limited, but availability depends on the rare disease of interest [35, 39, 47]. For example, a review found two studies which included utility values for Cushing's syndrome, whereas another review concerned with Crigler-Najjar syndrome found no data on the humanistic burden, apart from anecdotes on treatment challenges [39, 47]. In addition, there are data limitations on the quality of life of caregivers [63]. A probable explanation for the scarcity is the limited applicability of quantitative methods such as choice experiments or conjoint analysis in rare diseases e.g., due to small sample sizes [35]. Furthermore, studies tend to be small, not randomised or controlled, which decreases the reliability of conclusions [51]. This scarcity of evidence may lead to the use of assumptions e.g., assumption of equal utility values across treatment arms or linearity assumption of utilities between different time points [46, 47]. Moreover, the reviews highlight shortcomings in methods and reporting. For example, the failure to include utility values or mapping algorithms, and insufficiently describing the elicitation of utility weights [58, 64].

### 3.6. Issues with health-economic evaluations

#### 3.6.1. Cost effectiveness

Health-economic evaluations for rare diseases are scarce. For example, a systematic review failed to identify any studies, whereas another noted a remarkable absence of pharmacoeconomic evidence [45, 58]. A notable

241 opinion on the cause of scarcity is that limited information on input parameters simply deter people from  
242 attempting to construct cost-effectiveness analyses, because it is presumed unachievable [62]. In brief, causes  
243 are missing patient-level data, high drug costs and inability to measure effects for clinical or quality-of-life  
244 outcomes [55, 57, 62].

245 The difficulties for economic evaluation are driving factors for the use of assumptions to overcome challenges  
246 for cost-effectiveness modelling. For example, assumptions on mortality, efficacy, treatment, and complications  
247 [55]. It is commonplace to use modelling techniques such as mapping algorithms or long-term extrapolation for  
248 outcomes, because of data limitations [38, 47]. Moreover, limited patient numbers coupled with unreliable  
249 estimates of effects, symptoms, and complications, suggest that methods such as patient-level-simulation  
250 modelling may have limited applicability in rare diseases [62].

251 Additionally, publication bias in relation to positive-results or industry-sponsorship bias seems to be prominent  
252 in rare diseases [66, 67]. It may occur when manufacturers decide to publish only if they have favourable cost-  
253 effectiveness results, a post-marketing obligation, or an opportunity to adopt favourable input parameters and an  
254 advantageous interpretation of results [45, 62, 65]. Numerous reviews suggest issues of publication bias [38, 45,  
255 49, 61, 65]. For example, Schuller, Hollak and Biegstraaten indicated a higher frequency of analyses in  
256 countries with post-marketing obligations [62]. Others found that studies failed to discuss the direction and  
257 magnitude of bias, despite using data from potentially biased sources [38, 61, 65]. Another review highlighted  
258 selection bias to explain conflicting cost-effectiveness results for a particular drug [49]. Also, it was highlighted  
259 that most studies were industry funded in a systematic review of cost-utility analyses for haemophilia [64].  
260 Furthermore, incremental cost-utility ratios were significantly lower when published by industry compared to  
261 foundations and academia [49].

262 Most economic evaluations have moderate quality, and the failure to reach high quality may be partly attributed  
263 to lack of good quality model inputs (e.g. utility values that do not account for patient characteristics and disease  
264 severity) or because they omit lifetime horizons for chronic rare diseases [55, 59, 61]. Moreover, problems with  
265 reporting are frequently highlighted as another factor which may contribute to insufficient quality. For example,  
266 not adequately reporting discount rates, sensitivity analyses, utility weights, patient characteristics, funding  
267 sources, and time horizons [38, 59, 64].

268 Transferability is another issue for cost-effectiveness results [57]. Cost-effectiveness analyses are heterogenous,  
269 because of modelling variations in treatments, patient populations, time horizons, countries, cost-effectiveness  
270 thresholds, settings, year of analysis, comparators, and assumptions [49, 51, 55, 59, 61, 62, 64]. Thus, a high  
271 degree of carefulness is advised when assessing the transferability of results across different healthcare settings  
272 [61].

### 273 3.6.2. Budget impact

274 Studies on budget impact modelling are few, mostly from high-income or native English-speaking countries. If  
275 Kanters and colleagues' suggestion is accurate, it is not possible to rule out publication bias as a cause for the  
276 scarcity of studies on budget-impact modelling [45]. Furthermore, they are low quality and show poor adherence  
277 to guidelines [33, 45]. A proportion of budget-impact studies fail to report side effects, drug-related services,  
278 life-extension costs, savings from mortality reductions and validation methods [33, 53]. The importance of  
279 assumptions should not be overlooked, which are frequently incorporated for target populations, population  
280 sizes, interventions, comparators, costs, and market uptake [33].

## 281 3.7. Issues with estimating value and reimbursement

### 282 3.7.1. Value frameworks and thresholds

283 Most countries require budget-impact and cost-effectiveness models as part of HTAs, but the appraisal process  
284 (e.g., cost-effectiveness thresholds) may vary across countries, thus making comparison difficult. As mentioned,  
285 whilst evidence may be scarce, input parameters on prevalence, incidence, number of treatment-eligible patients,  
286 and clinical benefits are nonetheless needed when estimating budget impact and cost effectiveness for rare  
287 diseases [54]. For Europe, reference pricing further adds to the complexity and may prevent launches of orphan  
288 drugs in low-income countries [57]. Overall, value frameworks may suffer from transparency and consistency  
289 issues. This largely makes budget-impact and cost-effectiveness analyses country specific [36, 61].

### 3.7.2. Multiple criteria decision analysis (MCDA)

290  
291 MCDA is an emerging value framework for orphan drugs, because it offers an opportunity to include a broad  
292 range of value criteria e.g., societal, disease or treatment criteria [31, 41]. Critics highlight variations in scoring  
293 functions for value criteria as a significant limitation and for decision making it is difficult to observe consistent  
294 recommendations [41, 56]. Interestingly, by meticulous examination of value criteria weights and scores in  
295 MCDA, Friedmann and colleagues suggested that traditional value aspects used in HTA (budget impact and cost  
296 effectiveness) were considered unimportant by stakeholders involved in orphan drug appraisal processes. The  
297 most cited value criterion was disease severity (n=10), cost-effectiveness (n=7) and budget impact (n=3) were  
298 cited 10 times, collectively [41]. By contrast, Mohammadshahi and colleagues found in their review an equal  
299 citation frequency for the value criteria: disease severity (n=8), cost effectiveness (n=8), and budget effect (n=8)  
300 [32].

## 301 4. Discussion

302 This section discusses the umbrella review findings, which indicated multiple issues for the economic evaluation  
303 of orphan drugs in rare diseases. However, it was not possible, with confidence, to assert whether all issues for  
304 orphan drugs applied less to other drugs, which was part of the original research objective [1]. Many papers  
305 focused on the evidence for a specific disease or multiple diseases, rather than how it compares to other drugs.  
306 For example, a systematic review of available evidence on 11 high-priced inpatient orphan drugs found that  
307 study populations were significantly smaller in randomised trials for orphan drugs as compared to non-orphan  
308 drugs [45]. Other systematic reviews in rare diseases confirmed that study populations were small but did not  
309 compare to other drugs [12, 37, 57]. The magnitude of issues varies, and this is the case for orphan and other  
310 drugs. Thus, some of these issues may also be applicable to other drugs, however, these issues are critical in the  
311 case of orphan drugs as the issues tend to be amplified. In acknowledgement of this inability to consistently  
312 compare to other drugs, Table 1 in Online Resource 5 provides an indication of commonality for issues with  
313 economic evaluation of orphan drugs.

### 314 4.1. Issues with health-economic parameters

315 Scarcity of evidence was reported for natural history of disease, clinical effectiveness, costs, and quality of life  
316 [12, 34, 39, 42-45, 47, 48, 51, 52, 55, 57, 58]. It was previously pointed out that there were simply no easy  
317 answers to the problem of assessing evidence for orphan drugs [9]. In this review, this was exemplified by  
318 analysts who expressed a hope, rather than an actionable plan, for better availability of clinical trials with longer  
319 time horizons to conduct a thorough analysis of cost effectiveness, for example, for paediatric-pulmonary-  
320 arterial hypertension [37]. Others have suggested that high drug prices and inability to measure effects would  
321 discourage people from even attempting to construct cost-effectiveness analyses [62]. This interpretation  
322 contrasts with that of Picavet and colleagues who conclude that orphan drugs can meet traditional cost-  
323 effectiveness thresholds [49]. It is an option to use expert opinion if little data is available, although it may be  
324 difficult to obtain [68, 69].

325 Some strategies may help improve evidence sources, but most do require extensive resources. For example,  
326 registries have the potential to inform modelling on natural history of disease or can help construct a  
327 replacement for standard of care which may be relevant for trials without a control arm [12, 62, 63]. In addition,  
328 surrogate markers can play a vital role when clinical trials have short durations, they may, however, be difficult  
329 to validate without long-term data [57]. Analysts have drawn attention to this matter and highlighted the  
330 importance of consulting experts and to source data from other similar diseases to fill data gaps e.g., quality of  
331 life associated with wheelchair confinement between multiple sclerosis (more prevalent) and Duchenne's  
332 disease (less prevalent) [12]. Lastly, authors suggest investigating geographical variation in treatment patterns,  
333 reporting of side effects, long-term trials in disease areas with little evidence, and a Cochrane review group  
334 dedicated to systematic reviews that reduce evidence gaps for orphan drugs [37, 48, 60].

335 For cost-of-illness studies in rare diseases, firstly, the studies should be clear on their perspective; secondly,  
336 report indirect costs separately from direct costs e.g., lost productivity; thirdly, report costs associated with  
337 prevented comorbidities; fourthly, provide clarity on applied discount rates [34, 42, 59, 63]. The importance of  
338 future research for informal care, in terms of costs and quality of life, was highlighted by multiple authors,  
339 because rare diseases may have severe implications for the closest providers of care e.g., family and friends [34,  
340 55, 63].

#### 341 4.2. Issues with health-economic evaluations

342 Systematic reviews reported a scarcity of cost-effectiveness-modelling studies [45, 58]. As alluded to earlier, it  
343 could suggest a strong link between evidence issues, publication bias, and the observed paucity of cost-  
344 effectiveness analyses [62]. Researchers want economic evaluations with higher quality and extended time  
345 horizons [61]. To achieve this aim, without conducting a clinical trial, one could evaluate: entry-level  
346 agreements and registries for data collection, patient surveys to assess burden of disease, Delphi techniques for  
347 validation, expert opinion for estimation, population-adjusted-indirect comparison to account for patient  
348 characteristics, and rare events with high costs [12, 64].

349 The explanations for the paucity of budget-impact models may be in terms of input parameters e.g., issues  
350 around lack of data for prevalence or incidence estimation could contribute to their paucity [48, 51]. Budget-  
351 impact models were low quality and rarely validated. Summarising recommendations for improvement, they  
352 simply were that researchers should adhere to guidelines [33, 70]. Furthermore, publication bias for budget-  
353 impact models cannot not be ruled out [45, 54]. HTA bodies often require them, but for manufacturers, being  
354 the cause of increased healthcare costs might not be a message worth communicating, thus providing an  
355 explanation for potential publication bias. It is plausible that budget impact is less of a concern for rare diseases,  
356 because low prevalence can translate to lower impact on budgets for payers, thus providing another explanation  
357 for the scarcity of publications.

#### 358 4.3. Issues with estimating value and reimbursement

359 The appropriateness of value frameworks in the context of rare diseases is debated. For traditional value  
360 frameworks, examples of proposed solutions are: weighting of quality-adjusted life years (QALYs) according to  
361 disease severity and prevalence, categorising QALYs based on disease states, implementing higher cost-  
362 effectiveness thresholds, special rules for those that exceed thresholds e.g., managed-entry-level agreements and  
363 stopping rules for cost containment [12, 57]. The United Kingdom is an example where some of these measures  
364 have been incorporated through the Innovative Medicines Fund for medicines that are promising but associated  
365 with high uncertainty or decision modifiers through highly-specialised-technology appraisal [17, 71].

366 As highlighted throughout this review, criticism of traditional value frameworks has partly been related to their  
367 limited transparency and transferability of results. Critics have suggested policymakers to explore other  
368 frameworks e.g., MCDA. So far, this method has only seen sporadic implementation, but it is clearly emerging  
369 [31, 41]. The benefit of MCDA is the ability to include a range of value criteria e.g., burden on caregivers [36,  
370 41]. However, like traditional frameworks, transferability and transparency for MCDA are areas that warrant  
371 further research [41, 56]. However, it should be noted that using a different value framework will not solve the  
372 problem of evidence scarcity.

## 373 5. Recommendations

374 Challenges are abundant and solutions are not plentiful and rarely forthcoming. Stakeholders, however, must  
375 recognise that certain types of research are costly and demanding these could further eliminate company  
376 incentives to research rare diseases [57]. For example, clinical trials with extended time horizons. Thus, there is  
377 a need for recommendations that are more sustainable. As a first step towards these, we provide practical  
378 recommendations that may help alleviate challenges identified in this umbrella review.

#### 379 5.1. Comprehensive and flexible cost-effectiveness models

380 Data availability is critical at the time of economic evaluation for rare diseases, this is why economic models  
381 should be transparent, uncertainty rigorously explored through sensitivity analyses, and set up for continuous  
382 updating as data become available over time [59]. Continuous updating of cost-effectiveness models with new  
383 data is an unexplored opportunity, especially, considering the necessity of post-launch-monitoring or real-world  
384 data [12, 60]. Such a framework has been referred to as living HTA [18, 72].

385 Furthermore, transparency may increase for other stakeholders that are not trained researchers because user-  
386 friendly interfaces e.g., Shiny apps in the software R allow them to “safely” explore model scenarios without  
387 having to face backend code [73]. For risk-sharing agreements, rather than focussing purely on clinical  
388 endpoints e.g., survival, they could potentially allow for fully updated cost-effectiveness models.

389 Consequently, for economic evaluation of rare diseases, there is untapped potential for using living HTA. What  
390 is more, it has been recommended to use cost-effectiveness models in rare diseases to facilitate expected value  
391 of information analysis using inputs from e.g., phase II or registry data [12]. It provides researchers with an  
392 opportunity to address root causes of uncertainty by reprioritising or initiating data-collection efforts [74]. For  
393 example, before initiation of a phase III trial or HTA.

394 In summary, we recommend using comprehensive and flexible cost-effectiveness models, which report value of  
395 information as initially suggested by Pearson and colleagues, which should as a minimum include both expected  
396 value of perfect information (EVPI) and expected value of perfect parameter information (EVPPI) [12].

### 397 5.2. Publication bias and ability to meet cost-effectiveness thresholds

398 In the case of bias, one unanticipated finding was the extent to which publication bias seemed to be an issue [38,  
399 45, 61, 62, 65]. Unfortunately, failure to account for bias can result in overambitious claims e.g., that cost-  
400 effectiveness analyses for rare disease can indeed meet traditional cost-effectiveness thresholds. In this example,  
401 most studies were industry funded, which made the authors speculate and wary of potential publication bias  
402 [49]. Their sample of studies was not fully representative for economic evaluations of rare diseases, because  
403 they mainly came from the literature, and if the hypothesis of publication bias is correct, there must be a higher  
404 likelihood that these studies were published, simply because they showed that cost-effective thresholds were  
405 reached.

406 Unfortunately, biased conclusions may disrupt ongoing efforts to improve reimbursement conditions for orphan  
407 drugs, and momentum could be lost if policymakers take their conclusion at face value. The overall conclusion  
408 that cost-effectiveness analyses can meet common cost-effectiveness thresholds seems strongly contested by the  
409 findings of this review. In this example, the research would have been more convincing if the authors had  
410 considered cost-effectiveness analyses submitted to HTA bodies as compared to those available in literature. We  
411 recommend further research to determine the effect of publication bias on the ability to meet cost-effectiveness  
412 thresholds and caution when interpreting results.

### 413 5.3. Other opportunities

414 Researchers need to identify data gaps years before economic evaluation to allow for sufficient time to generate  
415 the data needed. We have already described the potential for registries, but we recommend in addition to  
416 conduct early economic evaluation of phase II data, which may provide timely knowledge on pricing and  
417 reimbursement [75]. Furthermore, patient organisations may be able to support reimbursement efforts, as there  
418 should be a mutual interest to bring orphan drugs to the market.

419 Another opportunity is risk-sharing agreements. Decision-makers have implemented alternative ways of  
420 financing in response to high uncertainty for interventions e.g., future clinical and economic outcomes for  
421 orphan drugs [76, 77]. In short, they are in place to facilitate risk-sharing between those supplying  
422 (manufacturers) and paying (healthcare providers) for health interventions, why they have broadly been referred  
423 to as risk-sharing, pay-for-performance or managed-entry agreements. Although, nomenclature is not consistent,  
424 they can generally be divided into two categories: health-outcome-based or non-outcome-based agreements [78,  
425 79].

## 426 6. Limitations

427 Our review has some limitations. First, two researchers conducted screening of titles and abstracts, but only one  
428 reviewer conducted the full screening and quality assessment. For this reason, the reliability could have been  
429 higher. To make up for this, we transparently report full screening and quality assessment in Online Resource 4.  
430 Second, exclusion of studies that did not qualify as systematic reviews meant that there was a chance of missing  
431 valuable information. Such an example was a narrative review of orphan drugs, which could have supported our  
432 findings [9]. Moreover, the search only included studies from 2010. However, the literature searches were partly  
433 based on search filters, which balanced sensitivity and specificity. Third, we included all studies, no matter their  
434 quality rating, to maximise inputs into the study. This resulted in the inclusion of one study with a low-quality  
435 rating [31]. Fourth, advanced therapeutic medicinal products (ATMPs) were excluded from this umbrella  
436 review, even if they were considered orphan drugs. It has been much debated whether they should qualify as  
437 drugs, because the production process typically involves modifying cells or genes. There are challenges for

438 economic evaluation of ATMPs such as high prices and sparse supportive evidence e.g., small sample sizes,  
439 single-arm studies, and insufficient follow-up [80]. Thus, the identified opportunities for orphan drugs could  
440 apply equally to them. However, there are likely differences, ATMPs are frequently curative with a one-off cost,  
441 which is why major challenges are affordability and long-term uncertainty [81-83]. Furthermore, it was  
442 previously suggested to consider economic aspects for curative and non-curative treatments differently [57].  
443 Finally, cross-referencing in the included papers was most prominent in recent papers, and in those with a  
444 broader scope. For example, a review concerned with methods for assessment of orphan drugs included six  
445 references, whereas another review of economic evaluations for enzyme replacement therapy in lysosomal  
446 storage disease included none [32, 46].

## 447 7. Conclusions

448 This umbrella review set out to determine issues for the economic evaluation of orphan drugs. The most obvious  
449 finding to emerge from this study was scarcity of evidence for clinical effectiveness, costs, quality of life,  
450 natural history of disease. Scarcity of evidence and publication bias emerged as possible causes for the limited  
451 quantity of economic evaluations from literature. The results support the notion that economic evaluation of rare  
452 diseases is challenging.

453 We recommend that researchers focus on sustainable initiatives and explore flexible cost-effectiveness models  
454 e.g., using living HTA. We highlight that further research is required to determine the effect of publication bias  
455 on the ability to meet cost-effectiveness thresholds.

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### 457 8.1. Funding

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### 460 8.2. Conflicts of interest

461 The authors have no competing interests to declare that are relevant to the content of this article.

### 462 8.3. Availability of data and materials

463 All data generated or analysed during this study are included in this published article and its supplementary  
464 information files.

### 465 8.4. Ethic approval

466 Not applicable.

### 467 8.5. Consent to participate

468 Not applicable

### 469 8.6. Consent for publication

470 Not applicable

### 471 8.7. Code availability

472 Code used to create a PRISMA compliant flow diagram in Figure 1 is available from:

473 <https://doi.org/10.5281/zenodo.8232536>

474 Code used to create an interactive version of Figure 2 data extraction themes, sub-topics and findings is

475 available from: [tobiasgrand.github.io/-data-extraction-themes.github.io/](https://tobiasgrand.github.io/-data-extraction-themes.github.io/) and files are available from:

476 <https://zenodo.org/doi/10.5281/zenodo.10201217>

### 477 8.8. Authors contribution

478 All authors contributed to the study conception and design. Material preparation, data collection and analysis  
479 were performed by Tobias Sydendal Grand. James Hall was second reviewer, hence assisted with screening of

480 papers. The first draft of the manuscript was written by Tobias Sydendal Grand, and all authors commented on  
481 previous versions of the manuscript. All authors read and approved the final manuscript.



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