薬価制度改革を考える緊急フォーラム「議論のポイントと今後の論点」

2016年12月9日(金)



趣旨

- 現在、政府を中心として、薬価制度改革に関する動きが活発化している。2016年11月25日には安倍首相が経済財政諮問会議において「薬価制度の抜本的改革に向けた基本方針の年内とりまとめ」を指示、29日には塩崎厚生労働大臣が閣議後の記者会見において、「年4回の新薬価格決定機会の活用」に言及した。12月7日の第20回経済諮問会議では、薬価の改定頻度を「少なくとも年1回」に増やす方針で一致した
- そこで、今回、薬価の話題に留まらず、今後の技術革新による医療の効率化に向けた取り組み、社会保障の持続可能性に向けた制度設計のあり方等について、フェアかつグローバルな視点からマルチステークホルダーによる議論を通じ、実現可能な解決の方向性を生み出すことを狙いとして、緊急フォーラムを開催した
- 緊急フォーラムでは、産学民のパネリストによるパネルディスカッションに加えて、多様な参加者が集った会場からも、提言 やコメントが数多く寄せられた。これらの提言やコメントを踏まえて、以下の通り、議論のポイントを抽出したうえで、今後 議論すべき論点を日本医療政策機構が取りまとめた

フォーラム概要

日時:2016年12月9日(金)16時00分~18時00分

会場:大手町フィナンシャルシティグランキューブ3 階 Global Business Hub Tokyo

主催:特定非営利活動法人 日本医療政策機構

参加者:有識者、学術関係者、医療提供者、企業関係者、患者リーダー、メディアなど(計60名)

プログラム: (敬称略・順不同)

16:00-16:10 趣旨説明 乗竹 亮治(日本医療政策機構 事務局長)

16:10-17:10 パネルディスカッション

- · 五十嵐 中(東京大学大学院 薬学系研究科 医薬政策学 特任准教授)
- ・ 桜井 なおみ(キャンサー・ソリューションズ株式会社 代表取締役社長/がん対策推進協議会 患者委員)
- ・ 平手 晴彦(武田薬品工業株式会社 コーポレート・コミュニケーションズ&パブリックアフェアーズ オフィサー)
- ・ 白沢 博満 (MSD 株式会社 副社長執行役員 グローバル研究開発本部長/医師)
- ・ (ドイツから中継コメント:小野崎 耕平(日本医療政策機構 理事))

17:10-18:00 質疑応答、会場との意見交換、とりまとめ

▋主に議論されたポイント(詳細)

- ▶ 今般の高額な薬剤に関する議論は、日本のみならず世界中で共通の課題となっている。保健当局の医療保険政策に関する議論にとどまらず、各国政府において中心的な政策課題となっている
 - この1~2年で環境は激変しつつある。高コレステロール血症治療薬のレパーサ、C型肝炎治療薬のソバルディやハーボニー、 抗がん剤のオプジーボ等の高額薬剤の保険収載や販売が契機となり、医療システムにおいて、コストの観点も真剣に検討し なければならない状況に差し迫ってきた
 - 医療保険制度全般の課題について、保健当局だけではハンドルできなくなってきている。今回の薬価制度の議論は、従来の厚生労働省ではなく、官邸や経済財政諮問会議が主導になり行われている。これは、日本のみならず世界共通の傾向である (例: OECD保健大臣会合における高額薬剤問題のアジェンダ化や、米国オバマ大統領による薬価に関するアメリカ医師会雑誌(JAMA: Journal of the American Medical Association)への寄稿等)
- ▶ 高額薬剤を中心に薬剤費を抑制しようとする現在の動きに対しては、革新的な医薬品開発の促進やアクセス確保の 観点から多くの懸念がある
 - 政府が革新的な医薬品の創出を強力に推し進めている一方、革新的な医薬品が、高額というだけで「悪者」にされている風潮に違和感を覚えている関係者も多い
 - これまでの日本の薬価制度は、微妙なバランスを保ち成立していた。オプジーボの薬価は例外として、全体的に見て日本の薬価は欧米と比べても安い。また、新薬創出加算制度の導入にも伴って、ドラッグラグも大きく解消してきたことは成果である
 - 日本の薬価制度は予見性が高いものとして製薬企業や投資家も評価してきたものの、今回の早急な変更や改革により、薬価への予見性が大きく損なわれた。今後、日本での開発に対する投資が停滞し、革新的な医薬品が日本の患者へ届けられなくなる不安を感じる関係者も多い











- ▶ 真に革新的であり医療現場にとって意義が高い医薬品と、そうではないものに対して、今後は、よりメリハリのある薬価制度が必要でないか。そのためには費用比較による評価のみでなく、医薬品を評価するアプローチやプロセスを慎重に検討する必要がある
 - 真に革新的であり医療現場における意義が高い医薬品(これまでの例であれば、HIV治療薬や完治が見込めるC型肝炎治療薬等)に対しては、先進国において高い薬価をつける一方、革新性の低い医薬品に対しては、不相応に高い薬価は不要ではないか。薬価調整とは、医療現場の診療フローの中で、患者視点のニーズを考慮して、その医薬品が提供する価値と価格のバランスを検討するプロセスであるべきだ。なお、医療に必須な基礎的医薬品等は一定の薬価を維持する等配慮が必要だろう
 - 先進的な日本の製薬企業では、この流れに沿い、長期収載品の切り離しや研究開発分野の絞り込み等の痛みを伴う改革を既 に行い、革新的な医薬品を創出する覚悟を決めている
 - 一方で、革新性の高い医薬品や、その費用対効果の評価方法については、十分かつ慎重に検討する必要がある。費用対効果の評価に際して、QALY(Quality-Adjusted Life Year: 質調整生存年)などをベースに増分費用効果比(ICER: Incremental Cost Effectiveness Ratio)を求めるアセスメントだけではなく、倫理面や財政影響など、費用対効果以外の要素を考慮するアプレイザル(総合的評価)のプロセスの理解も重要である。ケースバイケースではあるが、終末期の場合等、どのような要素を複合的に評価すべきかは、今後の検討課題。実際に先行する英国の国立医療技術評価機構(NICE: National Institute for Health and Care Excellence)においても、多くの例外的な措置がある。NICEでは、償還等に際する意思決定の場に、患者や患者団体も多く参画している
- ▶ 医薬品のイノベーションと、医療保険財政の持続可能性を両立していくためには、薬価制度の改革にとどまらず、 適正使用の促進やカバレッジ範囲の議論までにも踏み込み、同時に議論する必要がある
 - 薬価だけではなく、使用量や使用範囲も適正化すべきでないか。現在の薬剤の使用状況には課題が多い。例えば、いわゆる 残薬問題の解決や、ガイドラインに沿った適正な使用等により、医療費を効率化できる余地がある。また、想定以上の患者 に使用された場合、売上を一部、企業から医療保険財政に返還する等の施策も考えられる
 - これまでは、承認されたほぼすべての薬剤が、一律の割合で償還対象となってきたが、基準を満たさないものは保険収載しない、疾病の深刻度によって償還の範囲や重みづけを調整する(例えば、風邪薬は保険で償還しない)等の議論も必要だろう
- ▶ イノベーションと医療保険財政を両立していくためには、薬剤のみならず、臨床試験含めた医療全体の効率化・質の向上や、医療保険財源の確保にも取り組む必要がある
 - 薬剤費だけを議論の俎上に上げるのではなく、医療システム全体をみたうえで、効率化に取り組む必要がある(例えば、在院日数の最適化、重複する検査の削減、大型診断機器等の配置の集約化、アウトカムに基づく支払い制度の導入、コンパクトで効率的な臨床試験、臨床試験デザイン時点からの費用対効果の視点導入等)
 - 医療の効率化を進めると同時に、必要な医療保険財源の確保に向けて取り組む必要がある。増税の検討や、高額療養費制度 や後期高齢者医療制度における利用者の負担増、また医療保険制度における保険者の負担増等に対しても、議論を先送りし ないことが必要だろう
- ▶ 薬価制度改革は、国民の医療や健康全体に関わる重大なテーマであり、データ等も活用しつつ、国民的議論を伴って実現していく必要がある
 - 製薬業界を含めた医療システムが社会基盤であり、多くの雇用を支えていること等も踏まえ、円滑な改革の推進を目指していく必要がある(例えば、ドイツにおける過去の薬価制度改革による混乱の反省等)
 - ナショナルデータベース(NDB: National Data Base)等の医療データベースや医療情報連携基盤(EHR: Electronic Health Record)等を活用し、エビデンスやデータに基づく政策決定を推進すべきだろう

▶ 以上の改革にあたっては、各ステークホルダーがそれぞれ意思決定に参画し、実現に向けて役割を果たしていく必要がある

- 製薬企業に代表される産業界も、イノベーションの創出や医療全体における無駄の排除等のために、一部は「身を切る」ことも厭わずに、今後、建設的な対案を提出し、議論を深めていくべきではないか。また、薬価調査や価格交渉を担う医薬品 卸企業の議論参画も促すべき
- 医師等の医療従事者も、プロフェッショナルとして、医療保険財政の状況も踏まえつつ、どのように患者の健康を最大化できるのか、薬剤の使用方法等についても考えていく必要がある
- 患者や市民も、臨床試験のデザイン、個々の薬剤の評価等まで含めて、保険制度の設計に参画していく必要がある。また、 医療保険制度の仕組みを学校教育に取り入れる等も必要だろう
- 社会全体の医療リテラシーを向上させるためにメディアも貢献できる。例えば、今回の高額薬剤の件も、単にオプジーボの 価格を切り下げたことが解決やゴールになるのではなく、どのように薬剤の価格や使用にメリハリをつけるべきかという、 課題が残っていることを伝えていくべきだろう。また、制度改革に伴う患者への影響という点についても、中立的に報道していく必要がある

今後検討すべき論点

- ▶ 医療保険財政の健全性を担保しつつ、革新的な医薬品の開発やアクセスを促進していくため、薬価制度のみでなく、 適正使用やカバレッジを含めた制度全体をどのように設計していくべきか
 - 真に医療の現場に貢献するような革新的な医薬品を適切な方法で評価する一方、そうでないものに対する評価を下げる等、 企業にとっても予見可能性が高い、メリハリの付いた薬価制度をどのように設計していくべきか
 - 残薬問題などを考慮し、国民の健康アウトカムの向上の視点から、薬剤の使用量や使用範囲における重複の除去や効率化を、 どのように促進していくべきか
 - 現在の一律な償還の仕組みを進化させ、薬剤に対する償還や自己負担の割合を薬剤種別毎に最適化することも今後必要ではないか
- ▶ 薬剤のみでなく、医療全般の効率化や質の向上をどのように合わせて進めていくべきか
- ▶ 医療の効率化や質の向上への取組みを前提とした上で、必要な医療保険財源を確保するために、適切な国民負担のレベルや方法は何か
- ▶ 以上の改革を、どのように、患者を含む多様なステークホルダーを巻き込みつつ意思決定の上、混乱を最小限にしつつ円滑に実現していくか











Urgent Forum on Drug Pricing Reform

Friday, December 9, 2016



Summary

- There has been a lot of action on drug pricing recently, centered on Government activities. On November 25, 2016, Prime Minister Shinzo Abe instructed the Council on Economic and Fiscal Policy and the Ministry of Health, Labour and Welfare to draw up an outline for a comprehensive revision of Japan's prescription drug pricing system by the end of the year. At a post-cabinet meeting press conference on November 29, Minister of Health, Labour and Welfare Yasuhisa Shiozaki unveiled a plan to review the prices of in-demand drugs up to four times a year. In the latest meeting by the Council on Economic and Fiscal Policy on December 7, its members agreed on a plan to review drug pricing at least once a year.
- -This urgent forum was held with the aim of producing ideas toward achievable solutions through fair and global multi-stakeholder discussion related to issues of not only on drug pricing, but also initiatives to streamline medical care through technological innovation and the design of systems to ensure the sustainability of social security.
- -Many recommendations and comments were made by the private, public, and academic panel discussion members, as well as the other participants that attended the forum. HGPI has compiled and prioritized points that need to be discussed based on these recommendations and comments.

Overview of Forum

Date & Time: 16:00-18:00, Friday, December 9, 2016

Venue: 3F, Otemachi Financial City Grand Cube, 1-9-2 Otemachi, Chiyoda-ku, Tokyo

Organizer: Health and Global Policy Institute (HGPI)

Participants: Experts, academics, health providers, members of the private sector, patient advocates, and journalists (60 participants in total)

Program:

16:00-16:10 Introduction by Ryoji Noritake (President, HGPI)

16:10-17:10 Panelist Discussion (names listed in no particular order)

- Igarashi Ataru (Associate Professor, Department of Drug Policy & Management, Graduate School of Pharmaceutical Sciences, University of Tokyo)
- Naomi Sakurai (President, Cancer Solutions Co., Ltd. / Patient Representative, Cancer Control Promotion Council)
 - Haruhiko Hirate (Corporate Communications and Public Affairs Officer, Takeda Pharmaceutical Co., Ltd.)
- Hiromichi Shirasawa (Vice President and Executive Officer, Head of Japan Development, MSD K.K. / Medical Doctor)
- With live commentary from Germany by Kohei Onozaki (Board Member, HGPI)

17:10-18:00 Q&A, open discussion, and wrap up

Main points of discussion

- ▶ In recent years, high drug pricing has grabbed worldwide attention. Discussions around health insurance policies have moved outside of only health departments to become central policy issues for each government.
 - The environment has been drastically changing in the past few years. Opportunities have been created for insurance coverage and the selling of high priced drugs such as Repatha used to control high blood cholesterol, Sovaldi and Harvoni for Hepatitis C, and the chemotherapy Opdivo. There is a pressing urge to seriously consider cost perspectives in healthcare systems.
 - Health departments are increasingly unable to handle issues related to health insurance systems by themselves. Discussions on drug pricing systems are now being led by the Prime Minister's Office and the Council on Economic and Fiscal Policy instead of the Ministry of Health, Labour and Welfare. This phenomenon is observed in other parts of the world as well (E.g. the discussion of high priced drugs at the OECD Health Ministerial Meeting, the article published by the US President Barack Obama in the *Journal of the American Medical Association*, etc.)
- ▶ In terms of current movements to control drug price, which focus on high priced drugs, many expressed concerns related to promoting innovative drug development and securing access to drugs.
 - The Japanese Government has been strongly urging the development of innovative drugs. On the other hand, innovative drugs are often vilified for their high prices. Many involved with drug development feel uneasy about this.
 - Japan's drug pricing system has been established with and maintained a questionable balance. With the exception of Opdivo, the costs of drugs are overall cheaper in Japan compared to Europe and the United States. The great reduction in the time to market for drugs developed in Japan compared to elsewhere can also be said to be an achievement corresponding with the introduction of the supplementary fee system for new drug development.
 - Many pharmaceutical companies and investors praise Japan's drug pricing system for its foresight. That said, the urgent changes and reforms will impair that ability to predict future drug prices. Many expressed concern that in the future, investment into development in Japan may stagnate, and patients in Japan may not be able to access innovative drugs.











- ▶ A drug pricing system is needed that can regulate both drugs that are truly innovative and highly significant to healthcare settings and drugs that are less significant in a balanced way. In order to achieve this, there needs to be careful consideration of the approaches and processes used to evaluate drugs, in addition to price comparisons
 - It should be acceptable to set high prices in developed countries for drugs that are truly innovative and highly significant in healthcare settings (such as the HIV drugs and Hepatitis C drugs previously used as examples). On the other hand, it is unnecessary to set high prices for less innovative drugs. Drug pricing adjustments should be done using a process that considers patient needs within the flow of diagnoses in healthcare settings and takes into account the balance between a submitted drug's price and cost. There is a need to consider the maintenance of a certain price point for essential medicines.
 - Advanced Japanese pharmaceutical companies are already taking this trend into account and are undertaking reforms in light of the trouble they face as patient's move away from brand name drugs alongside the development of generic medications and as research fields narrow.
 - On the other hand, there is a need to sufficiently and seriously consider the methods used to evaluate highly innovative drugs and their cost effectiveness. When undertaking Health Technology Assessments (HTA), it is vital to not only do assessments of Incremental Cost Effectiveness Ratios (ICER) based on Quality-Adjusted Life Year (QALYs) and so on, but to also understand the process for appraisals that consider elements outside of cost effectiveness, such as logical issues and financial impacts. One issue moving forward will be the question of which elements should be evaluated in a complex way in cases of terminal care. This will need to be addressed on a case-by-case basis. Even in the National Institute for Health and Care Excellence (NICE) of the United Kingdom, a leading HTA organization, there are a number of exceptions in place related to drug pricing. In NICE, patients and patient groups are involved in decision-making related to reimbursements.
- ▶ In order to achieve a balance between the creation of innovative drugs and maintenance of sustainability in health finance, there needs to be discussions on not only drug pricing reforms but also the promotion of the appropriate usage of drugs and the range of coverage.
 - There is a need to set appropriate rules for not only drug prices but also the amount of drugs that should be used and the range of their uses. There are plenty of issues related to drug usage right now. For example, there is room to more effectively deal with medical expenditures by reducing the level of unused drugs or ensuring the use of proper treatment guidelines. Moreover, it is reasonable to think that pharmaceutical companies might contribute a portion of their profits to health insurance funds in cases where drugs are used by patients more than expected.
 - Up until this point, a uniform ratio of the cost of almost all approved drugs could be reimbursed. Drugs that didn't meet this criteria were not listed for use. There is a need to discuss adjustments to the range of reimbursements and severity levels depending on the seriousness of the disease in question (for example, insurance might not reimburse drugs used to treat the common cold).
- In order to balance innovation with health insurance finances, it is important to improve the efficiency and quality of healthcare services as a whole (including clinical trials), and secure financing for health insurance, in addition to addressing drug pricing.
 - Only blaming the drug pricing is nonsense; it is necessary to work on streamlining while considering the entire the health system (for instance, the optimization of lengths of hospitalization, reductions of overlapping medical examinations, the centralization of expensive medical diagnostic devices, the introduction of outcome based payment systems, compact and efficient clinical trials, and the early introduction of cost effective analyses when designing clinical trials).
 - The optimization of the health system should be advanced while simultaneously working toward the securing of funding resources for necessary health insurance. The critical point is not to postpone discussions of the increase in consumption tax, the reform of the high-cost medical care benefit system, the revision of the advanced elderly medical service system, or the increase of insurance fees.
- ▶ Drug pricing reform is an important topic that involves the medical care and health of the public. It should be realized through a nationwide discussion that makes use of empirical evidence.
 - The medical system, including the pharmaceutical industry, is the foundation of society. We must aim for the smooth promotion of reforms in light of issues such as the number of jobs supported by the industry (in other words, consider the lessons learned from drug pricing reform in Germany and other matters).
 - Evidence/data-based policy decisions should be promoted by utilizing health databases like the National Data Base (NDB) and electronic health records (EHR).

- To achieve the above, each stakeholder should get involved in decision making, and play a role to achieving the reforms.
 - The business world, represented by pharmaceutical companies, also needs to come up with constructive suggestions and deepen debate despite the potential that this will be a harrowing experience for it, in order to create innovation and reduce futile expenditures within the health care system as a whole. Wholesaler's associations that adjust and negotiate drug prices should also be involved in discussions.
 - As professionals, medical workers should consider how to maximize patients' health while considering the state of finances for health insurance. The usage of drugs should be discussed.
 - Patients and citizens should be involved in processes to build health systems, including the design of clinical trials and evaluations of drugs. Additionally, high school curriculum should cover health insurance system frameworks.
 - The media can also contribute to reforms from the perspective of developing health literacy. For example, in terms of high drug prices, the media should not report the cutting of the price of Opdivo as a solution or final goal, but communicate the issues that remain such as the problem of how to strike a balance between drug pricing and usage. The media also needs to conduct neutral reporting on the impact of system reforms on patients.

Issues to Consider in the Future

- ▶ In order to maintain the soundness of the national health insurance budget and stimulate innovative research and development, as well as the access to medicine for all people, there is a need to consider the design of the healthcare system overall, not limited to only drug pricing reforms but also the appropriate usage of drugs and issues of coverage.
 - How should a balanced drug pricing system be created that can facilitate foresight in companies as well as evaluate innovative drugs that truly contribute to medical care settings in an appropriate way while also lowering the price of drugs that don't meet such criteria?
 - In light of the issue of unused drugs, how can we streamline and eliminate overlap in terms of the amount of drugs used and range of uses from the perspective of improving health outcomes for the public?
 - Will there be a need in the future to evolve the current system that reimburses a unified proportion of drug prices and streamline reimbursements per drug and the proportion of out-of-pocket expenditures expected per drug category?
- ▶ How can we promote improvements to both efficiency and quality in the health system as a whole, beyond just drug pricing?
- ▶ What level of burden is appropriate for the public to take on, and what methods should be used in order to secure needed funds for health insurance, assuming that efforts will be made to improve the effectiveness and quality of healthcare?
- ► How can we make decisions involving multiple stakeholders, including patients, and achieve the above recommendations in a smooth way that minimizes confusion?









