

Analysis of Orphan Drugs Marketed in Spain during the Period 2010-2015: Epidemiological, Clinical and Economic Characteristics

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Abstract

Background: Since the adoption of the European law on orphan drugs in 2000, there has been a significant increase in the number of new therapies for the treatment of rare diseases. The present study aimed to analyse the evidence available on orphan drugs in Spain from 2010-2015 in epidemiological, clinical and economic terms.

Results: During this period, 61 orphan drugs were authorized by the European Commission (EC), of which 44 (72.2%) were authorized in Spain and 19 (31.2%) were finally marketed. The average time from the authorization to commercialization was 527 days. The clinical trials were mostly phase III (57.7%), randomized (79.1%), double-blind (54.2%) and/or open label (43.7%), with half using a placebo (49.9%). Quality-of-life measures were included in 62.4% of the trials and the number of patients in the trials ranged from 14-781. Pharmacological costs were negatively correlated with the prevalence of the diseases. In the absence of systematised economic evaluations in the Spanish setting, the reports published by the National Institute for Health and Care Excellence (NICE) and the Scottish Medicines Consortium (SMC) were reviewed and these showed a mean incremental cost-effectiveness ratio (ICER) of £121,072/QALY (quality-adjusted life years).

Conclusion: Orphan drugs marketed in Spain account for one-third of all drugs approved by the EC, with an average time from approval by the EC to commercialization of approximately one and a half years. Clinical trials of orphan drugs have mostly been phase III, randomized, double-blind and/or open label, although in several cases, the number of patients has been limited. An inverse correlation can be observed between the number of patients affected and the monthly pharmacological cost per patient. For 63% of the drugs, the ICERs were above the efficiency threshold.

Keywords: Orphan drug; Prevalence; Clinical trial; Cost-effectiveness ratio; PAS

Background

In the European Union, a rare disease is considered to affect fewer than five patients per 10,000 inhabitants, whereas in the United States, it is defined as affecting fewer than 200,000 patients throughout the entire country, which implies one per every 1,200 inhabitants [1]. Within this group of diseases, ultra-rare diseases are distinguished as those whose prevalence is even lower (one patient per 50,000 inhabitants) [2]. The World Health Organization (WHO) estimates that there are between 5,000 and 7,000 rare diseases, with 250 new ones discovered each year [3] and these affect 7% of the population globally. Despite their low prevalence, rare and ultra-rare diseases together affect approximately 30 million people in the European Union and 3 million in Spain in particular [4]. These diseases often pose a threat to the lives of the affected patients, produce chronic or severe disability and lead to a notable decrease in quality of life.

Orphan drugs are those intended to diagnose, prevent, or treat rare diseases. In 1993, the United States Government and in 2000, the European Union recognised the need to create regulatory mechanisms to encourage the development of orphan drugs [5-7]. Following the implementation of these measures, in the United States, 282 drugs and biological products were approved through 2007, compared to the 10 treatments approved prior to that time [8]. In the European Union, the new regulations elicited a significant increase in the number of drugs marketed, with 60 drugs authorized through 2010 [7].

The increase in the designation of orphan drugs and the associated economic impact are a controversial issue in developed countries, where an economic impact of €265 billion is expected over the next decade, in contrast to the current value of approximately €140 billion [9].

The designation of orphan drugs in the European Union is granted by the European Medicines Agency (EMA), although their funding lies in the health systems of the member countries, which also consider economic criteria [10]. The funding of orphan drugs is a challenge for health care systems because these drugs are often costly and have limited effectiveness [11]. However, in regard to funding orphan drugs, stakeholders generally consider other criteria, such as the severity of the disease, the absence of other therapies for the same disease and the cost to the patient if the medication is not reimbursed by the health care system [12].

There is debate among administrations over these therapies' effectiveness, cost-effectiveness, prevalence and economic impact, which explains the important differences between countries in financing these medicines [13]. The objective of the present study was to describe the evidence available on orphan drugs marketed in Spain from 2010-2015 in epidemiological, clinical and economic terms. Results from this study could contribute to improve the knowledge related to the approval of orphan drugs in Spain and could be of help

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for decision-makers when decisions about reimbursement of these drugs have to be made.

Methods

A search for orphan drugs approved by the EMA from January 2010 to December 2015 was performed. For each drug, data were collected on the dates of authorization and commercialization, the existence of conditional approvals, the therapeutic group and the indication. These data were obtained from the official website of the EMA [14]. The date of authorization in Spain was obtained from the Summary of Product Characteristics provided by the Spanish Agency of Medicines and Health Products (AEMPS) [15]. The date of commercialization in Spain was obtained from the Bot PLUS 2.0 database of the Spanish General Council of Official Colleges of Pharmacists (CGCOF) [16]. This information was used to calculate the time from the authorization of the orphan drug by the European Commission (EC) to the authorization in Spain and the time from the authorization in Spain to commercialization.

For the marketed drugs, data on the prevalence of the diseases for which they are indicated were collected using epidemiological data from the periodic report "Orphanet, rare diseases series" [17] and from the ex-factory price of the medicinal products marketed in December 2015 based on the Bot PLUS 2.0 database [16]. The estimates of the monthly pharmacological cost per patient were calculated from the pack costs of the different medicinal products of the orphan drugs and the dosage included in the Summary of Product Characteristics for each medication. For the calculation of drug costs and in the specific situation that the drug dosages are different depending on the patient's weight, m² of body surface area, or platelet count, information of the patient profile included as the base case in the economic evaluations published by the Scottish Medicines Consortium (SMC) was considered. For those drugs that had several medicinal products, the calculation was performed using the medicinal products with a lower cost and if the medicine required loading doses and maintenance doses, the calculation used the monthly cost for the maintenance doses.

The populations affected by rare diseases in Spain in 2015 were estimated using data on the Spanish population as of January 1, 2015, which were collected by the Spanish National Institute of Statistics (INE) [18] and data on the prevalence of these diseases.

Furthermore, the orphan drugs authorized in Spain during the period evaluated were selected for an analysis of the characteristics of the clinical trials that served as the basis for their authorization. Data were collected on the phase and design of each trial, the comparator used, the number of patients, the duration of the study and the inclusion of instruments to measure the patients' quality of life. The data were obtained from the evaluation reports published on the official website of the EMA [14].

Due to the absence of an organisation that systematically conducts national economic assessments in Spain, international data were used. Information was specifically collected from the National Institute for Health and Care Excellence (NICE) and from the SMC. The type of economic evaluation performed, the value of the incremental cost-effectiveness ratio (ICER), the existence of specific agreements to guarantee access to the drug and the final recommendation decision by the agency were identified. The ICER values from these reports were recorded as £/QALY (quality-adjusted life years) for the base case corresponding to the year in which the respective report was published.

Results

From January 2010 to December 2015, the EC authorized 56 orphan drugs with 61 orphan indications. Hereafter, the term "orphan drug" will be used to refer to both orphan drugs and orphan indications. Of these drugs, 44 (72.1%) were authorized for commercialization in Spain and 19 (31.2%) were finally marketed. The mean time from EC approval to authorization in Spain was 181 days (median: 81 days, range: 14 to 916 days) and the mean time from EC approval to commercialization in Spain was 527 days (median: 493 days, range: 124 to 1,032 days) (Table 1).

Of all the orphan drugs authorized in Europe during this period, 34 (56%) had some type of approval restriction due to the establishment of special authorization requirements. Conditional approvals based on monitoring of the efficacy and safety of the drug and provision of this information at annual intervals were the most requested, totalling 11 (32.4%) approvals. Authorization under exceptional circumstances wherein annual monitoring was also requested occurred in five of the approvals (14.6%). For the remaining 18 (53%) approvals, other types of studies were requested, or more specific restrictions were imposed (Table 1).

Figure 1 shows the therapeutic areas of the orphan drugs that were designated by the EMA, those that were authorized in Spain and those that were finally marketed during the 2010-2015 period. The most common therapeutic group was antineoplastic drugs, accounting for 37.7%, 50% and 57.9% of the European designations, Spanish authorizations and commercializations, respectively. The next most common groups in terms of European designations and Spanish authorizations were gastrointestinal and metabolic drugs (13.1% and 9.1%, respectively), although these numbered well below the antineoplastics.

An average of 1.3 clinical trials were performed per orphan drug to obtain approval authorization (Table 1 Supplementary Information). Figure 2 shows the temporal evolution of the approvals and commercializations that occurred during the study period. Increasing trends were observed across time with regard to the number of drugs that obtained the orphan designation, those that were authorized in Spain and those that were finally marketed.

Table 2 shows the characteristics of the clinical trials performed with orphan drugs authorized in Spain during the 2010-2015 period, classified by therapeutic area and totalled. Of the clinical trials, 57.7% were conducted as phase III trials, with the majority being randomized (79.1%), double blind (54.2%) and/or open label (43.7%).

Most trials used a placebo as a comparator (49.9%), followed by those without an active comparator (27%) and then by those with an active comparator (20.8%).

The clinical trials most commonly had a sample size of 50 to 249 patients (41.6%), with a size of 250 to 500 patients being second most common (27%). In 12.5% of the studies, there were fewer than 50 patients. The mean sample size of the trials was 260 patients.

Studies with a duration of up to 6 months accounted for 31.2% of the studies sampled. However, the duration of clinical trials depended on the type of disease. For example, in the case of antineoplastics, the majority of the trials were extended through the progression of the disease or until unacceptable toxicity (57.8%), without defining a specific period.

Drug	Brand	Indication (therapeutic group)	Authorization EC	Authorization in Spain	Commercialization in Spain	Restriction in the Authorization	Until commercialization (Spain) (Days)	Until commercialization (Days)	Total days
Glycerol phenylbutyrate	Ravelti	Hereditary disorders of the urea cycle (Gastrointestinal and metabolic)	27-11-2015	No	No	Registry of patients to obtain further information of long-term safety data	-	-	-
Bintraumab	Bincyto	Acute lymphoblastic leukaemia (Antineoplastic)	23-11-2015	16-12-2015	No	Conditional approval: study of effectiveness and safety	23	-	23
Cubic acid	Keblan	Hereditary lack of the acute (Hepatic)	20-11-2015	No	No	No	-	-	-
Cadifosom	Kyrosol	Multiple myeloma (Antineoplastic)	19-11-2015	04-12-2015	No	No	15	-	15
Efronecicosa alfa	Ebcta	Haemophilia A (Injection)	19-11-2015	No	No	No	-	-	-
Lumacaftor / Ivacaftor	Orkambi	Cystic fibrosis (Pulmonary)	19-11-2015	No	No	No	-	-	-
Ishuzucanazole	Cresamba	Aspergillosis (Infections)	15-10-2015	No	No	No	-	-	-
Ideloneone	Raxone	Hereditary optic neuropathy (Central Nervous System)	08-09-2015	No	No	Exceptional circumstances: Long-term efficacy and safety data	-	-	-
Sebelpase alfa	Kanuma	Lysosomal acid lysase deficiency (Gastrointestinal and metabolic)	28-08-2015	No	No	Registry of patients to set a long-term safety study by age subgroups	-	-	-
Asfadae alfa	Stensiq	(Gastrointestinal and metabolic)	28-08-2015	15-10-2015	No	Exceptional circumstances: Long-term efficacy and safety data	48	-	48
Panobinostat	Faystak	Multiple myeloma (Antineoplastic)	28-08-2015	22-12-2015	No	No	116	-	116
Dutometamol	Unifon	Neuroblastoma (Antineoplastic)	14-09-2015	No	No	No	-	-	-
Tasmetanin	Hefoz	Cardiac and sleep disorder (Psychiatric)	03-07-2015	No	No	No	-	-	-
Levatinib	Levatinib	Differentiated thyroid carcinoma (Antineoplastic)	28-05-2015	02-10-2015	No	No	127	-	127
ex vivo human corneal Epithelial Cell Stem	Holoclar	Deficiency in limbal stem cell (Ophthalmologic)	17-02-2015	16-08-2015	No	Conditional approval: annual monitoring	211	-	211
Eliglustat	Cerdiga	Gaucher disease (Gastrointestinal and metabolic)	19-01-2015	No	No	Long-term safety study without certain drugs	-	-	-
Nifedipam	Olev	Idiopathic pulmonary fibrosis (Immunosuppressant)	15-01-2015	06-03-2015	11-12-2015	No	53	277	330
Almetanotide	Scenesse	Prevention of phototoxicity with erythropoietic protoporphyria (Emollient and protective)	22-12-2014	No	No	Exceptional circumstances: annual monitoring	-	-	-
Ramucicromab	Cyramza	Gastric cancer and adenocarcinoma of the gastroesophageal junction (Antineoplastic)	19-12-2014	16-02-2015	01-12-2015	No	59	288	347
Olaparib	Lynparza	Cancer of the ovary, fallopian tubes and cancer of the peritoneum sensitive to platinum with BRCA gene mutations (Antineoplastic)	16-12-2014	04-02-2015	No	Long-term safety study	50	-	50
Ketoconazole HRA	Keptonazole HRA	Cushing's syndrome (Hormonal)	19-11-2014	No	No	No	-	-	-
Ibuprofen	Infrovia	Chronic lymphocytic leukaemia with genetic mutations in TP53 or have received at least one previous treatment (Antineoplastic)	21-10-2014	06-11-2014	No	Benefits information	16	-	16
Alatren	Transluma	Mantle cell lymphoma without response to other treatment or come back (Antineoplastic)	21-10-2014	06-11-2014	No	Study comparing with lenalidomide	16	-	16
Obintuzumab	Gazyvaro	Duchenne muscular dystrophy (Muscular)	31-07-2014	01-12-2014	No	Conditional approval: efficacy and safety additional data	123	-	123
Silumetinib	Sylvant	Chronic myeloid leukaemia without previous treatment and comorbidities for which imatinib is not recommended (Antineoplastic)	23-07-2014	06-08-2014	19-10-2015	No	14	439	453
Delamanid	Delyba	Gastrea's disease (negative for V1H and H4V-8) (Immunosuppressant)	22-05-2014	24-10-2014	No	Registry of patients to obtain further information of long-term benefits and safety	155	-	155
Esoalfase alfa	Vimzim	Multiresistant tuberculosis (Infections)	28-04-2014	No	No	Conditional approval: study of long-term effectiveness and safety data	-	-	-
4-Aminocaproyic acid	Granupas	Mucopolysaccharidosis type IVA in all patients (Gastrointestinal and metabolic)	28-04-2014	23-03-2015	No	Registry of patients to obtain further information of long-term benefits and safety	329	-	329
Ricoglut	Adempas	Multiresistant tuberculosis (Infections)	07-04-2014	No	No	No	-	-	-
Cetozantinib	Cometriq	Chronic pulmonary thromboembolic hypertension (Pulmonary)	27-03-2014	21-05-2014	19-05-2015	No	55	363	418
Bedaquiline	Sitro	Mediary thyroid cancer progressive, no resectable, locally advanced or metastatic (Antineoplastic)	21-03-2014	24-03-2015	No	Conditional approval: annual monitoring	368	-	368
Micafenfin	Opsumit	Multiresistant tuberculosis (Infections)	05-03-2014	18-03-2014	No	Conditional approval: annual monitoring	107	-	107
Defibrotide	Defitelio	Pulmonary arterial hypertension (Pulmonary)	20-12-2013	07-05-2014	01-05-2015	Not in pregnant women or who could become pregnant	138	390	528
Mericapamine	Procybi	Severe veno-occlusive disease (Antitumor)	18-10-2013	No	No	Exceptional circumstances: annual monitoring of efficacy, health and safety results	-	-	-
Colic acid	Orchacol	Nephrotic cystinosis (Gastrointestinal and metabolic)	09-09-2013	No	No	Data base to evaluate efficacy and safety in intervals	500	-	500
Pomalidomide	Imnovid	Hereditary deficiency of bile acids (Hepatic)	05-08-2013	20-12-2013	13-06-2014	Pregnancy prevention programme	137	175	312
Ponatinib	Iclusig	Chronic myeloid leukaemia resistant or intolerant to dasatinib or imatinib and for the subsequent treatment with imatinib or the mutation T315I (Antineoplastic)	01-07-2013	20-09-2013	No	Study for the best starting dose and the efficacy and safety following dose reduction	81	-	81
Bosutinib	Bosulf	Acute lymphoblastic leukaemia Ph+ (Antineoplastic)	01-07-2013	20-09-2013	No	No	81	-	81
Bromelain	Neobrid	Deep partial-thickness and full-thickness burns (Dermatologic)	18-12-2012	15-09-2014	No	Log-term comparative study in adults and children	636	-	636
Allogene liparovic	Glybra	Lipoprotein lipase deficiency (Lipid modifying agents)	25-10-2012	10-10-2014	No	Conditional approval: annual monitoring	715	-	715
Brentuximab	Adcetris	Chronic lymphoblastic leukaemia Ph+ with tyrosinase inhibitors and not treated with imatinib, nilotinib and dasatinib (Antineoplastic)	25-10-2012	29-11-2012	01-08-2014	Conditional approval: annual monitoring	35	610	645
Decitabine	Dacogen	Anaplastic lymphoma of large cells and Hodgkin lymphoma (Antineoplastic)	25-10-2012	29-11-2012	01-08-2014	Conditional approval: annual monitoring	35	610	645
Teglitide	Revestive	Acute myeloid leukaemia (Antineoplastic)	30-08-2012	26-05-2013	01-09-2014	Not eligible to decline	271	481	752
Rucadotril	Jakavi	Short bowel syndrome (Gastrointestinal and metabolic)	30-08-2012	26-05-2013	01-09-2014	Registry of patients to studies of effectiveness and safety	81	-	81
Kalydco®	Kalydco®	Primary myelofibrosis (Antineoplastic)	23-08-2012	12-11-2012	12-01-2015	Long-term effectiveness and safety studies	81	791	872
Palearotide	Signifor	Post-polycystoma vera, myelofibrosis (Antineoplastic)	23-08-2012	12-11-2012	12-01-2015	Long-term effectiveness and safety studies	81	791	872
Mannitol	Bronchitol	Cystic fibrosis with 9 mutations in CFTR gene (Pulmonary)	23-08-2012	11-06-2013	No	No	323	-	323
Meraptopurine	Xauprine	Cushing's disease after surgery failure (Hormonal)	24-04-2012	26-05-2012	No	Long-term safety study	34	-	34
Tofamidis	Tofamidis	Acute lymphoblastic leukaemia (Antineoplastic)	13-04-2012	05-02-2013	No	No	34	-	34
Hydrocortisone	Plenadren	Transferrin amyloidosis in adults with polycytophathy stage 1 (Central Nervous System)	03-11-2011	30-11-2011	01-12-2013	Conditional approval: annual monitoring	14	732	746
Everolimus	Velcade	Adrenal insufficiency (Hormonal)	02-09-2011	26-08-2011	24-06-2013	Conditional approval: annual monitoring	20	635	661
Toramycin	Tobi Podhater	Uropendymal giant cell astrocytoma and renal angiolipoma (Antineoplastic)	20-07-2011	12-06-2011	17-12-2012	No	23	483	516
Pfizeridone	Esbriet	Infection by bacteria called P. aeruginosa in cystic fibrosis (Infections)	28-02-2011	04-11-2011	01-09-2014	Study of safety and adverse events	249	1052	1281
Valganciclovir alfa	Vpiv	Idiopathic pulmonary fibrosis (Immunosuppressant)	26-06-2010	28-10-2010	01-03-2011	No	63	124	187
Oblitumab	Azera	Type 1 Gaucher disease (Gastrointestinal and metabolic)	19-04-2010	07-06-2012	01-07-2014	Conditional approval: annual monitoring	780	754	1534
Tidipasa	Tidipasa	Chronic lymphoid leukaemia (Infection in adults resistant to flutamide and abiraterone) (Hormonal/antibiotic)	15-03-2010	28-10-2010	07-07-2011	Conditional approval: annual monitoring	228	251	479

Table 1: Orphan drugs approved by CE, and authorized and commercialized in Spain.

***Days to commercialization in Spain is unknown

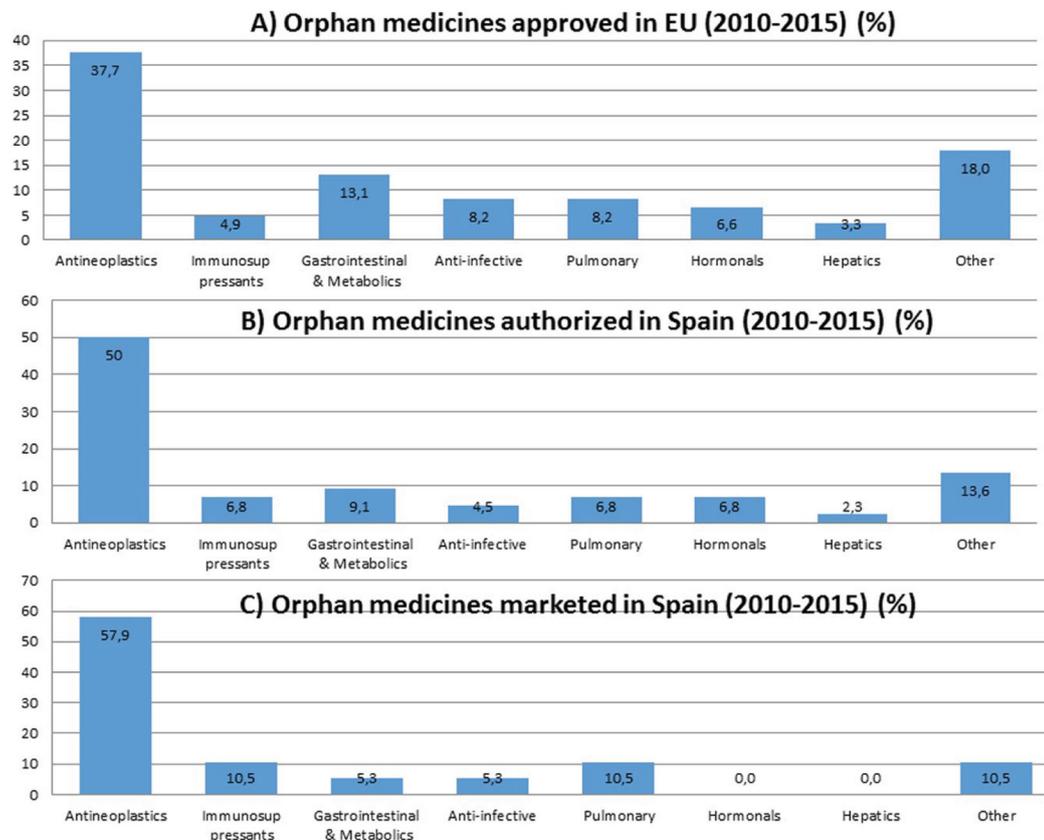


Figure 1: Distribution of the orphan drugs from 2010-2015 by therapeutic area. A) EU authorization; B) Spanish authorization and C) Spanish commercialization. "N" is the number of orphan drugs and "(%)" is the percentage of the therapeutic area.

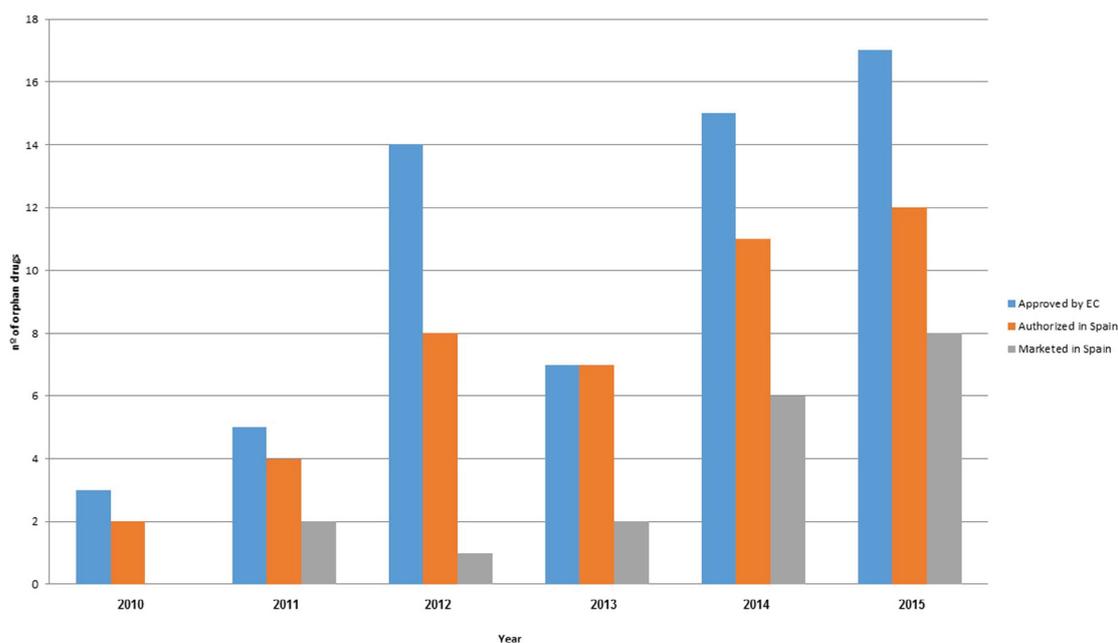


Figure 2: Annual number of orphan drugs from 2010-2015. Authorized by the EC and authorized and commercialized in Spain.

	Antineoplastics	Gastrointestinal and metabolics	Immunosuppressants	Anti-infective	Pulmonary	Hormonals	Hepatics	Others	TOTAL
Number of the orphan drugs	17	4	4	2	3	2	1	6	39
Number of the clinical trials	21	5	6	3	5	3	1	8	52
Type	21 (100%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	3 (100%)	1 (100%)	8 (100%)	52 (100%)
Phase I/II	1 (4.7%)		1 (16.6%)	1 (33.3%)				2 (25%)	1 (1.9%)
Phase II	7 (33.3%)								11 (21.1%)
Phase II/III	11 (52.3%)	3 (60%)	5 (83.3%)	2 (66.6%)	5 (100%)	1 (33.3%)	1 (100%)	1 (12.5%)	2 (3.8%)
Phase III	2 (9.5%)							1 (12.5%)	28 (53.8%)
Scientific literature		2 (40%)						3 (37.5%)	5 (9.6%)
Study to Determine the Safety and Efficacy								1 (12.5%)	1 (1.9%)
Retrospective evaluation								8 (100%)	48 (100%)
Design	19 (100%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	2 (100%)		5 (62.5%)	38 (79.1%)
Randomized	12 (63.15%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	2 (100%)		1 (12.5%)	3 (6.25%)
Non Randomized	2 (10.5%)							1 (12.5%)	5 (10.4%)
Single arm	4 (21%)							1 (12.5%)	1 (2%)
Retrospective evaluation								2 (28.5%)	26 (54.16%)
Cohort study	1 (5.2%)							5 (71.4%)	21 (43.7%)
Double-blind	7 (36.8%)	4 (80%)	5 (83.3%)	2 (66.6%)	5 (100%)	1 (50%)		1 (12.5%)	1 (2%)
Open-label	12 (63.1%)	1 (20%)	1 (16.6%)	1 (33.3%)				8 (100%)	48 (100%)
Retrospective evaluation								2 (25%)	22 (45.8%)
Comparators	19 (100%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	2 (100%)			
Placebo	7 (36.8%)	3 (60%)	3 (50%)	2 (66.6%)	5 (100%)				
Placebo and low doses of drug			2 (33.3%)						2 (4.1%)
Active comparator	4 (21%)	1 (20%)	1 (16.6%)					1 (12.5%)	7 (14.5%)
Not comparator	6 (31.5%)			1 (33.3%)				3 (37.5%)	9 (18.7%)
Dose escalation regimen								2 (25%)	4 (8.3%)
Replacement therapy								1 (2%)	1 (2%)
Best Available Therapy	2 (10.5%)							2 (4.1%)	2 (4.1%)
'Historical controls'		1 (20%)							1 (2%)
Number of patients	19 (100%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	2 (100%)		8 (100%)	48 (100%)
Less than 50	1 (5.2%)	2 (40%)						3 (37.5%)	6 (12.5%)
50-249	5 (26.3%)	3 (60%)	1 (16.6%)	2 (66.6%)	2 (40%)	2 (100%)		5 (62.5%)	20 (41.6%)
250-500	8 (42.1%)		3 (50%)		2 (40%)				13 (27%)
More than 500	5 (26.3%)		2 (33.3%)	1 (33.3%)	1 (20%)			9 (18.7%)	9 (18.7%)
Duration	19 (100%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	2 (100%)		8 (100%)	48 (100%)
Until 6 months	2 (10.5%)	4 (80%)	1 (16.6%)	3 (100%)	3 (60%)	1 (50%)		1 (12.5%)	15 (31.2%)
Until 12 months	1 (5.2%)	1 (20%)	2 (33.3%)		2 (40%)	1 (50%)		4 (50%)	11 (22.9%)
More 12 months	4 (21%)		2 (33.3%)					3 (37.5%)	9 (18.7%)
Until progressive disease or unacceptable toxicity	11 (57.8%)		1 (16.6%)						12 (25%)
Patients benefited from treatment	1 (5.2%)								1 (2%)
Quality-of-life evaluation	19 (100%)	5 (100%)	6 (100%)	3 (100%)	5 (100%)	2 (100%)		8 (100%)	48 (100%)
Not present	6 (31.57%)	1 (20%)	1 (16.6%)	2 (66.6%)	3 (60%)			5 (62.5%)	18 (37.5%)
Favorable	4 (21%)	2 (40%)						1 (12.5%)	7 (14.5%)
Neutral	6 (31.57%)								8 (16.6%)
Inconclusive	3 (15.7%)	2 (40%)	5 (83.3%)	1 (33.3%)	2 (40%)	2 (100%)		2 (25%)	15 (31.25%)

Table 2: Characteristics of the clinical trials of orphan drugs authorized in Spain from 2010-2015.

Drug	Indication	Prevalence (x10,000hab)	Target population	Estimation of nº of cases in Spain (2015)	Pack	Manufacture Selling Price (Decem. 2015)	Estimation of the monthly pharmacological cost per patient (Month 30.4 days)	Posology
Nintedanib	Idiopathic pulmonary fibrosis	3	Adult population	11,431	100 mg (60 tablets) 150 mg (60 tablets)*	2,403.85 €	2,435.90 €	150 mg twice a day
Ramucirumab	Gastric cancer and adenocarcinoma of the gastroesophageic joint	3	Adult population	11,431	10 mg/ml (1 vial 10 ml)* 10 mg/ml (1 vial 50 ml)*	597 € 2,985 €	7,259.52 €	8 mg per kg body weight given on days 1 and 15 of a 28-day cycle (mean weight: 75 kg)
Obinutuzumab	Chronic lymphocytic leukaemia	3	Adult population	11,431	10000 mg (1 vial/40 ml)	3,970 €	4,310.28 €	For the remaining cycles, a dose of 1,000 mg is given on day one only (cycle 28 days)
Riociguat	Chronic pulmonary tromboembolic hypertension	2	Adult population	7,621	1mg (42 tablets) 1.5 mg(42 tablets) 2mg (42 tablets) 2.5 mg (42 tablets)	1,260 €	2,736 €	1 mg three times a day for two weeks. The dose is then increased every two weeks until the appropriate dose for the individual patient is established. The maximum dose should not exceed 2.5 mg three times a day (All dose, the same monthly pharmacological cost per patient)
Macitentan	Pulmonary arterial hypertension	1.8	Adult population	6,858	10 mg (30 tablets)	2,450 €	2,482.67 €	10 mg once day
Pomalidomide	Multiple myeloma	2.2	Adult population	8,383	3 mg (21 caps.) 4 mg (21 caps.)*	9,300 €	10,097.14 €	4 mg once a day, taken at the same time each day for the first three weeks of the cycle, followed by a week of no treatment
Brentuximab	Chronic lymphoblastic leukaemia Anaplastic lymphoma of large cells and Hodgkin lymphoma	1 0.2	Adult population Adult population	3,810 762	50 mg (1 vial)	3,300 €	11,774.54 € 9,673.72 €	1.8 mg per kg every three weeks (mean weight: 75 kg)
Decitabine	Acute myeloid leukaemia	0.35	Adult patients aged 65 years	301	50 mg (1 via)	1,111.05 €	4,101.36 €	20 mg per m2 surface area per day (Mean body surface area: 1.7m2)
Ruxolitinib	Primary myelofibrosis Post-polycythaemia vera myelofibrosis Post-essential trombocythaemia myelofibrosis	0.5 5 0.01	Adult population Adult population Adult population	1,905 19,051 38	5 mg (56 tablets) 10 mg (56 tablets)* 15 mg (56 tablets)*	1,791.66 € 3,583.33 € 3,583.33 €	3,890.47 € 3,890.47 € 3,890.47 €	15 mg two times a day (SMC)
Tafamidis	Transthyretin amyloidosis	0.1	Adult population	381	20 mg (30 caps.)	11,100 €	11,248 €	20 mg once a day
Everolimus	Ubenodermal giant cell astrocytoma and renal angiomyolipoma	1	Adult population	3,810	2 mg (30 tablets) 2.5 mg (30 tablets) 5 mg (30 tablets) 10 mg (30 tablets)*	1,013.42 € 1,266.78 € 2,533.75 € 3,300.97 €*	3,344.98 €	In patients with renal angiomyolipoma, 10 mg once a day
Tobramycin	Infection by bacteria called <i>P. aeruginosa</i> in cystic fibrosis	1.3	Patients aged 6 years and older	5,681	28 mg (224 caps.)	2,243.33 €	4,486.60 €	112 mg twice a day for four weeks, followed by four weeks without treatment
Pirfenidone	Idiopathic pulmonary fibrosis	3	Adult population	11,431	267 mg (63 tablets) 267 mg (252 tablets)*	600.96 € 2,043.85 €	2,609.89 €	801 mg three times a day (2,609.89 € in subsequent months)
Velaglucerase alfa	Type 1 Gaucher disease	0.3	Patients aged 4 years and older	1,340	400 UI (1 vial)	1,409.54 €	34,433.05 €	60 units/kg, once every two weeks (Mean wright: 75 kg)
Ofatumumab	Chronic lymphoid leukaemia linfocitica	3.5	Adult population	13,336	100 mg (3 vials/5 ml)* 1000 mg (1 vial/50 ml)*	648.90 € 2,163 €	2,163 €	The first infusion should contain 300 mg on day 1, followed 7 days later by 1,000 mg. All subsequent infusions (which should be between 2 and 11 more infusions) should contain 1,000 mg given once a month. (2,163 € in subsequent infusions)
Thiotepa	Hematopoyetic cell transplantation	0.6	Adult and pediatric population	2,680	15 mg (1 vial) 100 mg (1 vial)*	135 € 810 €	8,778.37 €	In adults, the daily dose ranges from 125 to 300 mg per m2 administered from 2 up to 4 consecutive days before transplantation (Mean body surface area: 1,7m2)

Table 3: Prevalence, target population, estimation of the prevalence in Spain and estimation of the monthly pharmacological cost per patient.

The quality of life of the patients was measured in 62.4% of the trials. The result of this evaluation was inconclusive in 31.3%, neutral in 16.6% and favourable in only 14.5%.

Table 3 shows the prevalence for the rare diseases, the estimated population affected by these diseases in Spain in 2015 and the medicinal products and ex-factory price of each drug as well as the estimated monthly pharmacological cost per patient for the drugs marketed in Spain during the period evaluated. The estimated number of patients in Spain with a rare disease for which an orphan drug was marketed was 121,591. Among them, 19,051 patients had post-polycythaemia vera myelofibrosis and 38 patients had post-essential thrombocythaemia myelofibrosis, which had the highest and lowest prevalence, respectively. Moreover, the monthly pharmacological cost per patient ranged from €34,433 for velaglucerase alfa to €2,163 for ofatumumab, with an average cost of €7,032 for all the drugs.

Figure 3 shows the correlation between the estimated monthly pharmacological cost per patient and the prevalence of the disease. In general terms, the estimated monthly pharmacological cost was higher when the prevalence of the disease was lower and vice versa.

The NICE and SMC economic evaluation reports of the orphan drugs marketed in Spain between 2010 and 2015 are shown in Table 4. During this period, the SMC prepared 16 reports, whereas the NICE prepared 7. The ICERs of the study drugs in these reports ranged from -£13,295 to £1,232,645/QALY, with a mean ICER of £121,072/QALY for all the study drugs. ICERs below the threshold of £20,000-30,000/QALY were found in 36.8% of the evaluations [19]. With respect to the occurrence of some mode of a patient access scheme (PAS)-type agreement in the evaluations, 70% of them considered a final PAS after knowing the value of the ICER, whereas 47.4% procured a PAS agreement before the calculation of the ICER.

The final recommendations provided by the corresponding evaluating agencies were positive in 65.2% of the reports, compared to 34.8% negative. Of the latter, 37.5% were negative because economic information was not provided to the evaluating organisation.

Only one orphan drug (NexoBrid®) marketed in Spain during this period was not reported on by the two organisations.

Discussion

The European regulation on orphan drugs established in 2000 (141/2000) [7] has encouraged the development of therapies for rare diseases, which has in turn led to an increase in the number of authorizations [20]. Since that year, there has been a continued increase in the number of new authorizations for orphan drugs in Europe [7]. The results of the present study indicate that this growing trend continued through 2015. Despite the incentivising regulation, only 31.2% of the drugs authorized by the EC during this period were marketed in Spain. In addition, the waiting period until commercialization was very long, with an average of more than 500 days, meaning nearly a year and a half elapsed before the drugs could be marketed. These results are in line with other Spanish studies that determined that the period from approval by the EMA to the first prescription is 24 months [21].

In more than half of the cases (56%) in the current analysis, EC approvals of orphan drugs considered some type of conditional or exceptional circumstances. These approvals were mostly related to the small population of patients who participated in the clinical trials and always related to the prevalence of the disease and the measures of effectiveness achieved. This finding demonstrates that health

authorities positively value the discovery of effective drugs to treat cancer and that they are open to authorization based on early positive data [22]. The results additionally show that oncological drugs were much more often authorized than other therapeutic groups during the study period in Europe in general and in Spain in particular. This finding has also been observed in other studies [5,6,23]. The reason that this area is better developed may be that new diagnostic techniques can differentiate among different subtypes of cancer, thereby allowing orphan designation of low-prevalence subtypes [24]. Moreover, in the area of oncology, drugs are used to alleviate disease, such that the potential benefits can be very high because they imply patient survival, whereas in other rare diseases, drug administration is chronic and only produces limited improvement of the disease [25].

The majority of the clinical trials of orphan drugs approved in Spain were phase III (57.7%), randomized (79.1%) and/or double blind (54.2%), differing little from non-orphan drug trials in terms of the methodologies used [26,27].

The numbers of patients participating in the trials were low, meaning that it was challenging to obtain robust evidence regarding efficacy and safety and these numbers were quite different from the sample sizes observed in clinical trials of non-orphan drugs [27].

There was an increasing tendency to evaluate the quality of life of the patients in the clinical trials (62.4%), in contrast to other series studied [28]. This trend reflects the growing intention to provide evidence in this area, which is so important for rare diseases, where an increase in quality of life is often as important as achieving high treatment efficacy [29].

In recent years, the annual pharmaceutical budget for orphan drugs, accounting for 2.5% of spending in 2007 and 3.3% in 2010, with an upward prediction of 6.6% for 2020 [9,20]. This increase represents a challenge for ensuring the sustainability of health care systems. The present study shows that orphan drugs marketed in Spain for rare diseases with a lower prevalence are associated with higher pharmacological costs. This trend has already been described previously [10,23,30,31]. Even so, the calculation of the number of patients in Spain based on prevalence data for rare diseases and the general population of Spain may be obtained more reliably with the recent creation of a registry that includes the number of people affected in the country [32].

Economic evaluations are tools that help with health decision-making by identifying interventions that produce the greatest health outcomes with the given resources. In Spain, there is no organisation that systematically evaluates the efficiency of drugs. The current study therefore analysed information from the economic evaluations issued by two institutions in the United Kingdom that are pioneers in evaluating efficiency and that serve as models for countries where routine evaluations are not yet available. The ICER data from the evaluation reports showed a wide range (-£13,295 to £1,232,654/QALY), which coincides with the findings of another published study [33].

Of the evaluations, 36.8% had ICER values that would be considered efficient according to the NICE criterion [19], although in general, it is thought that these drugs are not cost-effective [12].

Strategies have been developed in recent years to help health decision-makers evaluate the effects of new oncology drugs under the conditions of daily clinical practice [34]. The evaluation of effectiveness [35], linked to PAS-type agreements, has become increasingly more common in recent years. The presence of PAS-type agreements for

Organization	Drug	Brand	Year	Indication	Costs included	Perspective	Evaluation	Sensitivity analysis	ICER		PAS (final)	Recommendation
									€/QALY	PAS (included in ICER)		
SMC	Obinutuzumab	Gazyvaro	2014	Lymphoid leukaemia	Health care costs	Health care system	Cost-Utility	YES	22,568-28,428	NO	NO	YES
NICE	Ramucirumab	Cyramza	2016	Gastric cancer	Health care costs	Health care system	Cost-Effectiveness	YES	188,640-118,209	NO	NO	NO
NICE	Nintedanib	Ofev	2016	Pulmonary fibrosis	Health care costs	Health care system	Cost-Effectiveness	YES	149,361	NO	YES	YES
SMC			2015		Pharmacological costs	Health care system	Cost-Utility	YES	-	-	YES	YES
SMC	Riociguat	Adempas	2014	Chronic pulmonary thromboembolic hypertension	Health care costs	Health care system	Cost-Utility	YES	-13,295	YES	YES	YES
SMC	Macitentan	Opsumit	2014	Pulmonary arterial hypertension	Health care costs	Health care system	Cost minimization	NO	61,008	NO	YES	YES
NICE	Pomalidomide	Imnovid	2015	Multiple Myeloma	Health care costs	Health care system	Cost-Utility	YES	50,366, 77,915 72,250 *	YES	NO	NO
SMC			2014		Health care costs	Health care system	Cost-Utility	YES	33,716	YES	YES	YES
SMC	Brentuximab	Adcetris	2014	Hodgkin disease lymphoma	Health care costs	Health care system	Cost-Utility	YES	43,731	NO	NO	YES
SMC	Decitabine	Dacogen	2013	Myeloid leukaemia	No reported	No reported	No reported	No reported	No reported	No reported	No reported	NO
NICE	Ruxolitinib	Jakavi	2013	Myelofibrosis, polycythaemia vera	Health care costs	Health care system	Cost-Utility	YES	73,980	NO	NO	NO
SMC			2015		Health care costs	Health care system	Cost-Utility	YES	49,774	YES	YES	YES
SMC	Ivacaftor	Kalydeco	2013	Cystic fibrosis with mutations in CFTR gene	Pharmacological cost	Health care system	Cost-Utility	YES	277,011	YES	YES	NO
SMC	Tafamidis**	Vyndaqel	2013	Amyloidosis	No reported	No reported	No reported	No reported	No reported	No reported	No reported	NO
SMC	Everolimus**	Volubia	2013	Astrocystoma	No reported	No reported	No reported	No reported	No reported	No reported	No reported	NO
NICE	Tobramycin	Tobi Podhaler	2013	Infection of P. aeruginosa in cystic fibrosis	Health care costs	Health care system	Cost-Effectiveness	YES	123,563	NO	YES	YES
SMC			2012		Pharmacologic cost	Health care system	Cost minimization	NO	11,675	NO	YES	YES
NICE	Pirfenidone	Esbriet	2013	Idiopathic pulmonary fibrosis	Health care costs	Health care system	Cost-Effectiveness	YES	36,327	YES	YES	YES
SMC			2013		Health care costs	Health care system	Cost-Utility	YES	27,575	YES	YES	YES
SMC	Velaglucerase alfa	Vpriv	2012	Type 1 Gaucher disease	Pharmacological cost	Health care system	Cost minimization	NO	1,232,645	NO	YES	YES
NICE	Ofatumumab	Arzerra	2015	Lymphoid leukaemia	Health care costs	Health care system	Cost-Utility	YES	23,414	YES	YES	YES
SMC			2015		Health care costs	Health care system	Cost-Utility	YES	28,813	YES	YES	YES
SMC	Tiotepa	Tepadina	2012	Hematopoietic cell transplantation	Pharmacological cost	Health care system	Cost-Utility	YES	3,426-4,110	NO	NO	NO

*50,366 comparison with bortezomib+dexametasona, 77,915 comparison with talidomida+dexametasona and 72,250 comparison with bendamustina+talidomida and dexametasona.
 ***No reported": pharmacoeconomic information was not provided to the evaluating organization and there is not a recommendation.

Table 4. Economic evaluation reports from NICE and SMC in marketed orphan drugs in Spain.

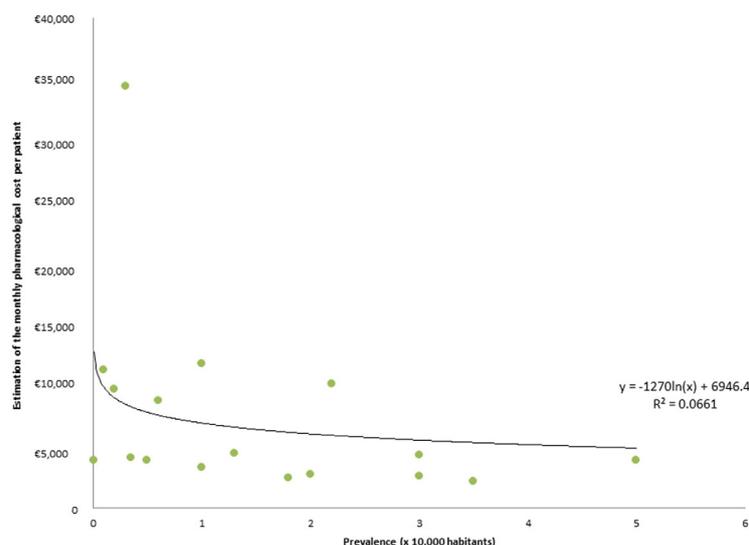


Figure 3: Monthly pharmacological cost per patient and estimated prevalence of rare diseases.

the recommendation of positive financing for the drugs included in this study highlights the importance of these payment strategies for reaching agreements on orphan drugs [34].

In Spain, health authorities have a growing concern about the impact of rare diseases in the population in terms of costs and quality of life. As an example, the Spanish Ministry of Health has developed a strategy in rare diseases for the National Health system with the implication of central and local stakeholders and also patient advocacy groups. The strategy includes the need of developing registries of patients, prevention campaigns and early diagnostic [36].

The limited availability of economic evaluations of these drugs [37,38] is one of the limitations of the present study. In addition, the assessments provided by the NICE and the SMC reports are not transparent regarding the determination of the ICER [9], making it difficult to perform comparisons and draw conclusions. What the reports do highlight is the importance of these types of agreements for favouring patient access to these therapies. Another issue to consider is that drug prices in England and Scotland are not necessarily comparable to those in Spain, which limits extrapolation of the results. Even so, both the NICE and the SMC evaluations are good guides and references and permit the conclusion that in general, orphan drugs have ICERs well above the widely considered efficiency thresholds and this circumstance is likely to be present in other countries.

The results from this study highlight the need for establishing mechanisms to speed the approval of orphan drugs and to reduce the variability in the approval by enhancing the transparency of price and reimbursement decisions.

Conclusion

Although there have been legislative measures that promote the development of therapies for rare diseases, these therapies account for 31.2% of commercialization in Spain, with time intervals from national authorization to commercialization that, on average, exceed a year and a half. This lag has a great impact on the expectations of patients who are delayed from being able to benefit from therapies for diseases for which there are often no alternatives available.

The scientific evidence generated for each orphan drug that has EC approval is sound and of high quality, including mostly phase III, randomized, double-blind and open-label clinical trials, although in many cases, the numbers of patients in the clinical trials are limited. An inverse correlation is observed between the number of patients affected and the monthly pharmacological cost per patient for these drugs.

The ICERs in the analysed reports show a great deal of variability, with 63% of the assessments being above the recognised thresholds and with a mean value exceeding £100,000/QALY.

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Competing interests

All authors have completed the ICMJE uniform disclosure form at www.icmje.org/coi_disclosure.pdf and declare: no support from any organisation for the submitted work; at the time of the study, JAS and TD were employees of Eli Lilly and hold Eli Lilly shares; no other relationships or activities that could appear to have influenced the submitted work.

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Authors' contributions

MN, BG, JAS and TD designed the study, developed the methodology and wrote the manuscript. MN and BG collected the data and performed the analysis.

Authors' information:

At the time this work was developed, MN and BG were students at University Carlos III, Madrid (UCIIM). JAS and TD are invited professors at Universidad Carlos III de Madrid (UCIIM).

References

1. Kodra Y, Fantini B, Taruscio D (2012) Classification and codification of rare diseases. *J Clin Epidemiol* 65: 1026-1027.
2. Schlander M, Garattini S, Holm S, Kolominsky-Rabas P, Nord E, et al (2014) Incremental cost per quality-adjusted life year gained? The need for alternative methods to evaluate medical interventions for ultra-rare disorders. *J Comp Eff Res* 3: 399-422.

3. Stolk P, Willemsen MJ, Leufkens HG (2006) Rare essentials: Drugs for rare diseases as essential medicines. *Bull World Health Organ* 84: 745-751.
4. Posada De la Paz M, Martín-Arribas C, Ramírez A, Villaverde A, Abitua I (2008) Rare diseases, Concept, epidemiology and state of the question in Spain. *An Sist Sanit Navar* 31: 9-20.
5. Wellman-Labadie O, Zhou Y (2010) The US orphan drug act: Rare disease research stimulator or commercial opportunity? *Health Policy* 95: 216-228.
6. Braun MM, Farag-El-Massah S, Xu K, Coté TR (2010) Emergence of orphan drugs in the United States: A quantitative assessment of the first 25 years. *Nat Rev Drug Discov* 9: 519-522.
7. Westermarck K, Holm B B, Söderholm M, Llinares-García J, Rivière F, et al. (2010) European regulation on orphan medicinal products: 10 years of experience and future perspectives. *Nat Rev Drug Discov* 10: 341-349.
8. Haffner ME (2006) Adopting orphan drugs: Two dozen years of treating rare diseases. *N Engl J Med* 354: 445-447.
9. Schey C, Milanova T, Hutchings A (2011) Estimating the budget impact of orphan medicines in Europe: 2010-2020. *Orphanet J Rare Dis* 6: 62.
10. Drummond MF, Wilson DA, Kanavos P, Ubel P, Rovira J (2007) Assessing the economic challenges posed by orphan drugs. *Int J Technol Assess Health Care* 23: 36-42.
11. Rosenberg-Yunger ZR, Daar AS, Thorsteinsdóttir H, Martin DK (2011) Priority setting for orphan drugs: An international comparison. *Health Policy* 100: 25-34.
12. Darbà J, Kaskens L (2013) Consideraciones económicas para la evaluación de los medicamentos huérfanos en las decisiones de financiación en España. *Pharmacoecoon Span Res Artic* 10: 141-146.
13. Denis A, Mergaert L, Fostier C, Cleemput I, Simoes S (2010) A comparative study of European rare disease and orphan drug markets. *Health Policy* 97: 173-179.
14. <http://www.ema.europa.eu/ema/>
15. <https://www.aemps.gob.es/>
16. <https://botplusweb.portalfarma.com>
17. Prevalencia de las enfermedades raras: datos bibliográficos (2014) Informes periódicos de orphanet Serie enfermedades raras. Vol. 1.
18. <http://www.ine.es>
19. McCabe C, Claxton K, Culyer AJ (2008) The NICE cost-effectiveness threshold: What it is and what that means. *Pharmacoeconomics* 26: 733-744.
20. Hughes-Wilson W, Palma A, Schuurman A, Simoens S (2012) Paying for the orphan drug system: Break or bend? Is it time for a new evaluation system for payers in Europe to take account of new rare disease treatments? *Orphanet J Rare Dis* 7: 74.
21. Salvador J, Urtasun JA, Duart FJ, García-Campelo R, Carbonero RG, et al (2017) Equity, barriers and cancer disparities: Study of the Spanish society of medical oncology on the access to oncologic drugs in the Spanish regions. *Clin Transl Oncol* 19: 341-356.
22. Dupont AG, Van Wilder PB (2011) Access to orphan drugs despite poor quality of clinical evidence. *Br J Clin Pharmacol* 71: 488-496.
23. Orofino J, Soto J, Casado MA, Oyagüez I (2010) Global spending on orphan drugs in France, Germany, the UK, Italy and Spain during 2007. *Appl Health Econ Health Policy* 8: 301-315.
24. Davies JE, Neidle S, Taylor DG (2012) Developing and paying for medicines for orphan indications in oncology: Utilitarian regulation vs. equitable care? *Br J Cancer* 106: 14-17.
25. Kreeftmeijer-Vegter AR, de Boer A, van der Vlugt-Meijer RH, de Vries PJ (2014) The influence of the European paediatric regulation on marketing authorization of orphan drugs for children. *Orphanet J Rare Dis* 9: 120.
26. Winstone J, Chadda S, Ralston S, Sajosi P (2015) Review and comparison of clinical evidence submitted to support European Medicines Agency market authorization of orphan-designated oncological treatments. *Orphanet J Rare Dis* 10: 139.
27. Downing NS, Aminawung JA, Shah ND, Krumholz HM, Ross JS (2014) Clinical trial evidence supporting FDA approval of novel therapeutic agents, 2005-2012. *JAMA* 311: 368-377.
28. Picavet E, Cassiman D, Hollak CE, Maertens JA, Simoens S (2013) Clinical evidence for orphan medicinal products—a cause for concern? *Orphanet J Rare Dis* 8: 164.
29. Kesselheim AS, Myers JA, Avorn J (2011) Characteristics of clinical trials to support approval of orphan vs. nonorphan drugs for cancer. *JAMA* 305: 2320-2326.
30. Onakpoya IJ, Spencer EA, Thompson MJ, Heneghan CJ (2015) Effectiveness, safety and costs of orphan drugs: An evidence-based review. *BMJ* 5: e007199.
31. Simoens S (2011) Pricing and reimbursement of orphan drugs: The need for more transparency. *Orphanet J Rare Dis* 6: 42.
32. <https://registroraras.isciii.es/Comun/Inicio.aspx>
33. Schuller Y, Hollak CE, Biegstraaten M (2015) The quality of economic evaluations of ultra-orphan drugs in Europe: A systematic review. *Orphanet J Rare Dis* 10: 92.
34. Clopes A, Gasol M, Cajal R, Segú L, Crespo R, et al. (2017) Financial consequences of a payment-by-results scheme in Catalonia: Gefitinib in advanced EGFR-mutation positive non-small-cell lung cancer. *J Med Econ* 20: 1-7.
35. Simoens S, Picavet E, Doooms M, Cassiman D, Morel T (2013) Cost-effectiveness assessment of orphan drugs: A scientific and political conundrum. *Appl Health Econ Health Policy* 11: 1-3.
36. http://www.msc.es/organizacion/sns/planCalidadSNS/pdf/Estrategia_Enfermedades_Raras_SNS_2014.pdf
http://www.msc.es/organizacion/sns/planCalidadSNS/pdf/Estrategia_Enfermedades_Raras_SNS_2014.pdf
37. Hyri HI, Stern AD, Cox TM, Roos JC (2014) Limits on use of health economic assessments for rare diseases. *QJM* 107: 241-245.
38. Kanters TA, de Sonnevill-Koedoot C, Redekop WK, Hakkaart L (2013) Systematic review of available evidence on 11 high-priced inpatient orphan drugs. *Orphanet J Rare Dis* 8: 124.