Annex I – Framework for individual pilot studies

The document presents a high-level framework on which to base the pilot study. This template should facilitate discussion of pilot studies, but should not be restrictive.

Product name/identifier

Summary of relevant product data and development to date (please include licensing history and interactions with health authorities/payers/HTA bodies, including non-EU – if applicable)

Proposal for development under adaptive licensing

Please propose 'adaptive' strategies for development, licensing, patient access, appropriate utilization, and monitoring that could be considered, using existing regulatory tools. Please address the following questions where relevant to the proposal:

a. Does the drug hold sufficient promise to address an unmet need (e.g. based on convincing Mode of Action, impressive preliminary animal/human data)?

b. What evidence would support a positive benefit-risk in a defined (sub-) population at the time of initial licensing, including surrogacy of early, pharmacodynamic endpoints and compatibility with legislation for 'normal' marketing authorisation (MA), Conditional MA (or MA under Exceptional Circumstances)? Also, what is the risk of failing to identify an important adverse effect based on early phase clinical trial data?

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c. What assurance of commitment from sponsor will there be to conduct further studies after the initial marketing authorisation. What is the feasibility of any required follow-on RCTs after initial Marketing Authorisation ('loss of equipoise'; lack of willingness of patients to enrol in RCT); what possibility to draw inferences from observational (non-RCT) data that are sufficiently reliable to support decision-making for regulators, payers and prescribers?

d. What is the level of confidence that the observational part of adaptive licensing can be implemented (adequate infrastructure for registry or e-health records)?

e. What is the likelihood that other decision-makers (HTA bodies/payers, healthcare professionals, patients) will be willing to contribute to discussions of the pilot?

f. What is the level of confidence that prescriber behaviour will be as anticipated? (risk of large share of off-label use, can this be mitigated by collaboration with payers?)

g. Any other questions or points the sponsor wished to address

Please outline a vision and timeline for how regulatory, payer and other stakeholders' interactions might look, including indicative timelines for regulatory evaluation and decision making through the product lifecycle.
