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EXPERT PANEL ON EFFECTIVE WAYS OF INVESTING IN HEALTH

(EXPH)

Opinion on
Application of the ERN model in European cross border
healthcare cooperation outside the rare diseases area

The EXPH adopted this opinion at the [to be inserted]^h plenary of [to be inserted]

About the EXpert Panel on effective ways of investing in Health (EXPH)

Sound and timely scientific advice is an essential requirement for the Commission to pursue modern, responsive and sustainable health systems. To this end, the Commission has set up a multidisciplinary and independent Expert Panel which provides advice on effective ways of investing in health (Commission Decision 2012/C 198/06).

The core element of the Expert Panel's mission is to provide the Commission with sound and independent advice in the form of opinions in response to questions (mandates) submitted by the Commission on matters related to health care modernisation, responsiveness, and sustainability. The advice does not bind the Commission.

The areas of competence of the Expert Panel include, and are not limited to, primary care, hospital care, pharmaceuticals, research and development, prevention and promotion, links with the social protection sector, cross-border issues, system financing, information systems and patient registers, health inequalities, etc.

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The opinions of the Expert Panel present the views of the independent scientists who are members of the Expert Panel. They do not necessarily reflect the views of the European Commission nor its services. The opinions are published by the European Union in their original language only.

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87 opinion.

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105 The declarations of the Working Group members are available at:

106 (add link)

107

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112 **SUMMARY**

113 European Reference Networks (ERNs) were created by the Directive on the Application of
114 Patients' Rights in Cross-Border Healthcare. They offer a means by which patients with
115 rare and complex diseases can gain access to highly specialised knowledge from across
116 the European Union. The Expert Panel has been asked to advise on areas that can benefit
117 most from the ERN model, options for the new networks in the longer term and the roles
118 that they might assume, and how best national health systems could integrate networks
119 into their national frameworks.

120 ERNs are still a very new concept, having been launched in March 2017. So far, 24 have
121 been established, bringing together over 300 hospitals from 26 Member States. Given the
122 short time that they have been operating, the Expert Panel concluded that it was premature
123 to draw any conclusions on their effectiveness. Instead, it sought to understand how other
124 networks with similar goals have operated within member states and the lessons that have
125 been learned, coupled with interviews with two of the coordinators of existing ERNs.

126 The Expert Panel concluded that, while ERNs have considerable potential to improve the
127 care of patients with rare diseases across the EU, both through advice on the management
128 of individual patients, as well as through collaboration on research and development of
129 guidelines, it is not yet possible to ascertain the extent to which these goals will be
130 achieved. The Expert Panel also identified several issues which, even at this stage,
131 appeared to need to be addressed, including long-term financial sustainability and the
132 implementation of effective IT systems.

133 Turning to the specific questions asked of the expert panel, we firstly concluded that the
134 current criteria for establishing a ERN, as a means of improving the management of
135 patients with rare and complex diseases, was appropriate. The ERN concept does not
136 address other issues raised for our consideration, such as remote areas and border regions,
137 or the development of new medicines or interventions, for which there are alternative and
138 more appropriate mechanisms. We were also asked about the scope to extend the scope
139 of ERNs to other areas such as the care of people who are homeless or emergency
140 situations. In both cases, we believe that there are better alternative mechanisms to
141 achieve the intended goals. Secondly, we examined the scope of the ERNs, and in particular
142 their relationship with research and guideline development. Given the current state of
143 implementation, it is not possible to come to a definitive conclusion, but we were persuaded
144 by the arguments that there is considerable scope for incorporating these additional roles
145 beyond the immediate objective of providing advice on individual patients. This will,
146 however, require dedicated resources, some of which will have to come from other sources.
147 Thirdly, while reinforcing the importance of ERN is to link with national health systems, the
148 diversity of systems within member states makes it impossible to provide detailed
149 guidelines for how this can best be made to work. This is another area where it will be
150 important to monitor the implementation of the existing ERNs and disseminate the lessons
151 that arise from their experiences.

152

153

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DRAFT

191 **1. BACKGROUND**

192
193 Member States seek to give their citizens access to the best possible health services. This
194 has led to various arrangements for cooperation between them. The European Union, on
195 the basis of Article 168 of the TFEU, plays an important role in complementing and
196 supporting national health policies, encouraging cooperation among Member States and
197 promoting coordination between their programmes. This general mandate was further
198 defined in Directive 2011/24/EU on the application of patients' rights in cross-border
199 health care.

200 The European Reference Networks (ERN)[1] are a prime example of structured and
201 voluntary collaboration among the EU Member States in the field of healthcare.

202 These cross-border networks bring together healthcare providers across Europe to tackle
203 rare and complex diseases that require highly specialised healthcare knowledge. The
204 ERNs give access to a much larger, cross-border pool of expertise and knowledge,
205 increasing the chances of patients receiving the best advice to treat and diagnose their
206 diseases. By assembling a large pool of patient data, they will, in the longer term,
207 facilitate large clinical studies to improve the understanding of diseases or support the
208 development of new medicinal products. Commissioner Andriukaitis highlighted the many
209 opportunities for cooperation provided by the ERNs, referring to them as a backbone on
210 which a European health data eco- system could be built [2].

211 Although the Directive makes particular reference to rare diseases, it has been suggested
212 that other conditions requiring specialized resources or expertise could also benefit from
213 the idea of networking to provide high-quality and cost-effective care [3]. Could the
214 experience gained in cross-border collaboration on rare diseases be transferred to other
215 health topics? To answer this question, it is necessary to assess what the gain in cross
216 border cooperation is, what areas might potentially be amenable to this approach and
217 what possibilities exist to realise this potential, as well as what the financial implications
218 would be.

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219 Rare diseases affect 6-8% of the population and as a group are an important public
220 health problem. Many of the more prevalent diseases with the highest mortality rates in
221 Europe, such as cardiovascular diseases (accounting for 34% of all deaths among men
222 and 40% among women), cancer (30% men, 24% women) and respiratory diseases (9%
223 men and 8% women) [4], are successfully treated at national level, although there are
224 likely to be specialised areas where European cooperation could bring further
225 improvements in outcomes. There are also specific treatment or diagnostic challenges
226 (e.g. genetic testing or access to expensive infrastructure, such as positron emission
227 (PET) imaging and proton beam therapy) as well as the delivery of services in border
228 areas, where cross-border collaboration brings added value [5]. There may also be
229 further roles, with the Council Conclusions of June 2017 suggesting that the ERNs could,
230 within their current scope, assume a role in highly specialized training and continuous
231 professional development for health professionals [6, Sec. 3a].

232

233 **2. TERMS OF REFERENCE**

234 The Expert Panel's opinion on the application of the ERN model outside the rare diseases
235 area would help to prepare future calls for new networks, by presenting the possibilities,
236 outcomes and expected difficulties of a broader cooperation.

237 The Expert Panel is requested to analyse the following:

238 (a) What are the areas that can benefit most from the ERN model of cross- border
239 cooperation? Should the selection process take into account:

- 240 ○ the nature of disease (prevalence, complexity),
- 241 ○ resources of the geographical area (small countries, remote areas,
242 border regions),
- 243 ○ medical intervention (treatment method or product),
- 244 ○ specific goal of such a cooperation (e.g. creating new medicine)?

245 (b) The panel should also address aspects related to the implementation of the
246 ERN model and advise on the different options for the long term nature of new
247 networks. Should the ERN model be used as a whole (covering diagnosis and
248 treatment, research, training, knowledge generation...) or only include specific
249 modules of collaboration depending on the need (e.g. only data gathering for
250 Artificial Intelligence or genetic testing)?

251 (c) How would national health systems integrate such networks into their national
252 framework? What are the difficulties to expect at national level? What would
253 be the best national approach in the aspect of referral, financing and changes
254 required in national legal systems?

255 **3. OPINION**

256 **3.1. Introduction**

257 Ever since the Treaty of Maastricht, the European Union has recognized the contribution
258 that cooperation in health services can bring to the people of Europe, while respecting
259 the rights of Member States to decide how they will organize health services within their
260 own national borders. The 2011 Directive on the Application of Patient's Rights in cross-
261 border care (cross-border directive) sets out the conditions under which a patient may
262 travel to another EU country to receive medical care and reimbursement. It covers
263 healthcare costs, as well as the prescription and delivery of medications and medical
264 devices. In addition, the directive established the principle of voluntary cooperation
265 between healthcare units in member states in highlight specialized healthcare. In
266 accordance with the article 12 of the cross-border directive ERNs were established in
267 2017 as cross-Europe virtual health-provider networks, aiming to facilitate discussion on
268 complex or rare diseases that require highly specialized knowledge or treatment.
269 Although the Directive does not define these networks precisely, it envisages the creation
270 of a means of sharing of knowledge and expertise, concentrating resources and patients,
271 and thereby improving diagnosis and treatment for those whose conditions are
272 sufficiently rare that it will be difficult to provide appropriate treatment, especially in
273 small member states. Furthermore, article 13 of the cross-border directive aims to make
274 patients, health professionals and those bodies responsible for the funding of healthcare
275 aware of the possibilities offered by Regulation (EC) No 883/2004 for referral of patients
276 with rare diseases to other Member States even for diagnosis and treatments which are
277 not available in the Member State of affiliation.

278 The expectation of ERNs is that they will offer the following benefits:

- 279
- 280 • access to a much larger, cross-border pool of expertise and knowledge, increasing the
281 chances of receiving the best advice to diagnose and treat their diseases, particularly
for small member states;
 - 282 • bringing together patients and resources, enabling economies of scale for accessing
283 treatment for rare diseases;

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- 284 • gathering a larger pool of patient data, thereby, in the longer term, facilitate large
285 clinical studies to improve the understanding of diseases or support the development
286 of new medicinal products.

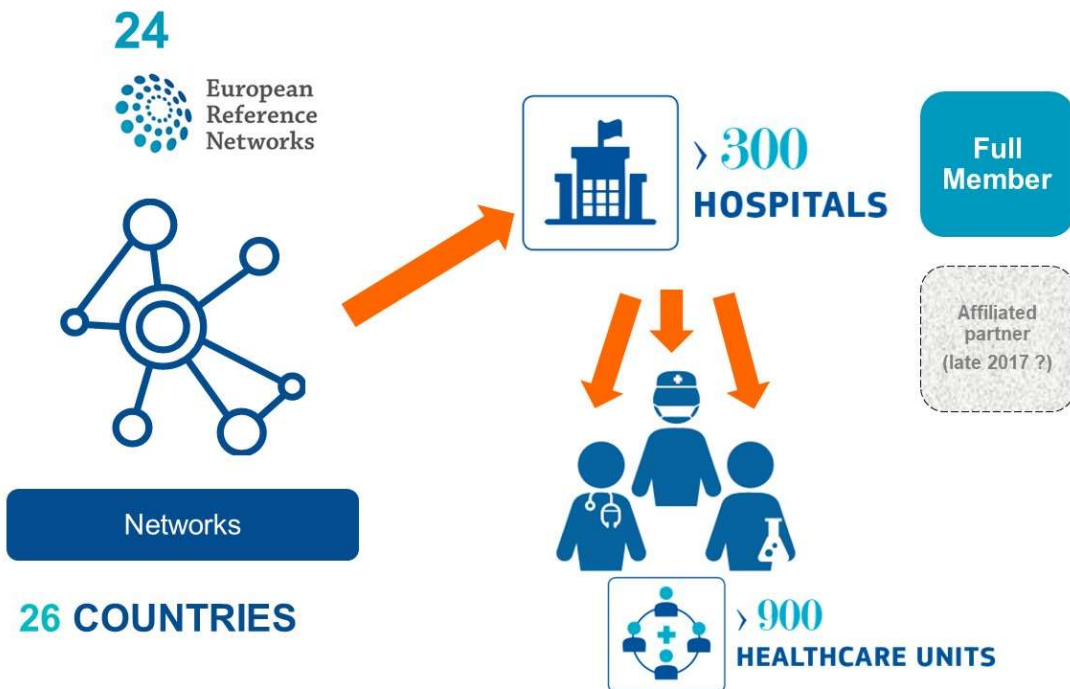
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288 Historically, certain bilateral arrangements did exist, with varying degrees of informality,
289 especially in the smallest member states such as Malta or Cyprus, or within the Nordic
290 countries. However, the new concept offers a stronger European legal basis for this
291 approach, enabling more people to access them.

292 Starting from March 2017, 24 ERNs have been established, bringing together over 300
293 hospitals from 26 member states (MS): the number of MSs participating in each ERN
294 varies between 8 and 19, and the number of reference centres in each MS varies
295 between 1 and 21 (with many reference centres taking part in more than one ERN)
296 (Figure 1) [7].

297

298 *Figure 1 The ERN concept*



299

300 The names and disease areas of the ERNs are listed in Table 1.

301 *Table 1 European Reference Networks*

302

303	BOND ERN	Bone Diseases	EuroBloodNet	Onco-Hematological Diseases
304	CRANIO	Craniofacial anomalies and ENT disorders	EUROGEN	Urogenital Diseases
305			EURO-NMD	Neuromuscular Diseases
306	Endo-ERN	Endocrine Conditions	GUARD-HEART	Diseases of the Heart
307			ITHACA	Congenital Malformations and Intellectual Disability
308	EpiCARE	Rare and Complex Epilepsies	MetabERN	Hereditary metabolic diseases
309	ERKNet	Kidney Diseases	PaedCan-ERN	Paediatric Cancer
310	ERN GENTURIS	Genetic Tumour Risk Syndromes	RARE-LIVER	Hepatological Diseases
311	ERN-EYE	Eye Diseases	ReCONNET	Connective Tissue and Musculoskeletal Diseases
312	ERNICA	inherited and congenital anomalies	RITA	Immunodeficiency, AutoInflammatory and Auto Immune Diseases
313	ERN-LUNG	Respiratory Diseases	TRANSPLANT-CHILD	Transplantation in Children
314	ERN-RND	Neurological Diseases	VASCERN	Multisystemic Vascular Diseases
315	ERN-Skin	Skin Disorders		
316	EURACAN	Solid Adult Cancers		

319

320 The ERNs must meet certain criteria, set out in Box 1.

321

322 *Box 1 Features and functions of ERNs*

323 *Key Features:*

- 324 • The process and criteria for establishing an ERN and for determining eligibility of
325 Centres of Expertise and healthcare providers to join are established in the
326 Commission Delegated Decision (2014/286/EU)
- 327 • ERNs must fulfil criteria for implementation and evaluation, including being patient-
328 centred and clinically led, with a minimum of 10 members in at least 8 countries,
329 subject to robust independent third party assessment, and endorsed and approved by
330 National Authorities.

331 *Key Functions:*

- 332 • To review a patient's diagnosis and treatment, ERN coordinators convene 'virtual'
333 advisory panels of medical specialists across different disciplines, using a dedicated IT
334 platform and telemedicine tool called the Clinical Patient Management system
335 (CPMS). This allows expertise travel to the patient, rather than vice versa.
- 336 • It allows sharing of expertise to diagnose, follow-up, and manage patients, and
337 facilitates a multidisciplinary approach, as well as collaboration and learning across
338 centres of expertise and networks at national and international level
- 339 • The focus is first on diagnosis and treatment by providing tools for collaboration and
340 virtual consultations. However, there are clear potential research applications.
- 341 • These functions support the development of good practice guidelines and outcome
342 measures for quality control, as well as contributing to research

343

344 All Networks and their Members should be periodically evaluated, at the latest every five
345 years after their approval or last evaluation.

346

347 **3.2. Legal basis**

348 ERNs were created within the framework of European legislation on cross border care,
349 presented in detail in the Expert Panel's report on Cross-border cooperation [5]. The key
350 elements are summarized again in this section.

351 European Union policy in the field of health is aimed at complementing and supporting
352 national health policies, encouraging cooperation between Member States and promoting
353 coordination between their programmes. Article 168.2 of the Treaty on the Functioning of
354 the European Union (TFEU) (European Union 2012) states: "*The Union shall encourage*
355 *cooperation between the Member States in the areas referred to in this Article and, if*
356 *necessary, lend support to their action. It shall in particular encourage cooperation*
357 *between the Member States to improve the complementarity of their health services in*
358 *cross-border areas. Member States shall, in liaison with the Commission, coordinate*
359 *among themselves their policies and programmes in the areas referred to in paragraph 1.*
360 *The Commission may, in close contact with the Member States, take any useful initiative*
361 *to promote such coordination, in particular initiatives aiming at the establishment of*
362 *guidelines and indicators, the organisation of exchange of best practice, and the*
363 *preparation of the necessary elements for periodic monitoring and evaluation. The*
364 *European Parliament shall be kept fully informed.*"

365 The general mandate contained in the Treaty has been spelled out in Directive
366 2011/24/EU on the application of patients' rights in cross-border health care [5]. In
367 addition to the objectives of establishing rules for facilitating access to safe and high-
368 quality cross-border health care and ensuring patient mobility in the Union, the Directive
369 aims to promote cooperation on health care between Member States (Recital 10). Recital
370 50 calls upon Member States to "*facilitate cooperation between healthcare providers,*
371 *purchasers and regulators of different Member States at national, regional or local level*
372 *in order to ensure safe, high-quality and efficient cross-border healthcare. This could be*
373 *of particular importance in border regions, where cross-border provision of services may*
374 *be the most efficient way of organising health services for the local population, but where*

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375 *achieving such cross-border provision on a sustained basis requires cooperation between*
376 *the health systems of different Member States”.*

377 The areas and modes of cooperation are further specified in Chapter IV of the Cross-
378 border directive. They include, in the first place, an obligation for Member States to
379 render mutual assistance to implement the Directive, *“including cooperation on standards*
380 *and guidelines on quality and safety and the exchange of information, especially between*
381 *their national contact points”* (Article 10.1). This also relates to exchanging information
382 (through the Internal Market Information (IMI) system) on the right to practice of health
383 professionals registered in one of the Member States (Article 10.4). In addition, Chapter
384 IV creates a concrete basis for cooperation and action in specific areas that have been
385 identified as particularly relevant: mutual recognition of medical prescriptions (Article
386 11), European Reference Networks (Article 12), rare diseases (Article 13), e-health
387 (Article 14) and health technology assessment (Article 15). This does not, in principle,
388 preclude cooperation in other fields as Article 10.2 also provides for a general
389 commitment for Member States to facilitate cooperation.

390 Rather than providing an exact definition, Article 12 of Directive 2011/24/EU lists the
391 objectives and characteristics for ERNs to qualify as such. Their functions and features
392 are set out in the Directive (Box 1), and include provision of the knowledge and expertise
393 to diagnose, follow-up, and manage patients, with evidence of good outcomes;
394 employment of a multidisciplinary approach; possession of a high level of expertise,
395 coupled with the ability to produce guidelines for good practice and to implement
396 outcome measures and quality control; to contribute to research; to organize teaching
397 and training activities; and to collaborate closely with other centres of expertise and
398 networks at national and international level (Article 12.2).

399 While there is formally no legal obligation for Member States to engage proactively in
400 each of the forms of cross-border collaboration, except in relation to some elements such
401 as recognition of prescriptions issued in another member state, the European
402 Commission (EC) is entrusted by the mandate to *“encourage cooperation between*

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403 *Member States in the areas set out in Chapter IV of this Directive and [...], in accordance*
404 *with Article 168(2) TFEU, take, in close contact with the Member States, any useful*
405 *initiative to facilitate and promote such a cooperation” (Recital 51). More specifically,*
406 *Article 10.3 calls for the Commission to “encourage Member States, particularly*
407 *neighbouring countries, to conclude agreements among themselves”. This also includes*
408 *specific action on border regions: “The Commission shall also encourage the Member*
409 *States to cooperate in cross-border health provision in border regions.” (Article 10.3 in*
410 *fine). One way for the Commission to do so is “by identifying major obstacles to*
411 *collaboration between healthcare providers in border regions, and by making*
412 *recommendations and disseminating information and best practices on how to overcome*
413 *such obstacles” (Recital 51). Furthermore, the Commission can adopt delegated and*
414 *implementing acts to organise cooperation in certain areas, e.g. medical prescriptions*
415 *and European reference networks.*

416 **3.3. What do we know about existing ERNs?**

417 As has been noted, ERNs are a very new concept and experience in their operation is
418 very limited. The existing ERNs have only been operational since 2017 and a relatively
419 small number of patients have been referred, so it is too early to determine how effective
420 they have been.

421 To inform our work we have undertaken interviews with two ERN co-ordinators, Franz
422 Schaefer, coordinator of ERKNET: European Reference Network for Rare Kidney Diseases,
423 a consortium of 38 expert paediatric and adult nephrology centres in 12 Member States,
424 and Marissa Tejedor Botello, project manager for TransplantChild, the ERN for Paediatric
425 Transplantation, including both Solid Organ Transplantation (SOT) and Hematopoietic
426 Stem Cell Transplantation (HSCT). This ERN is concerned with a specific treatment
427 (childhood transplants), rather than a single condition, since the conditions leading to
428 transplants are diverse.

429 **3.3.1. How do networks benefit patients?**

430 We first asked how networks benefit patients. Two main ways were identified: the
431 pooling of expertise and the pooling of patients. The pooling of expertise is achieved by

432 convening specialists in member centres (which in theory improves management of all
433 patients being treated in the centre due to knowledge sharing and development), and
434 through uploading individual cases to an online Clinical Patient Management System
435 (CPMS). Once a case is referred and uploaded, a panel of experts is selected, depending
436 on the specific expertise needed. Clinical details are reviewed, and an online chat facility
437 enables communication between the primary clinician and the expert panel. A report is
438 then produced, providing the primary clinician advice for patient management.

439 This ability to pool and share expertise, resources, and experience for rare conditions
440 requiring complex treatment was seen by both interviewees as the main benefit of the
441 ERN model. Coordination of experts on rare diseases has resulted in the development of
442 guidelines, with 39 new ones published by (ERKNET), as well as knowledge sharing and
443 benchmarking.

444 The second main benefit is creating a critical mass of patients: collecting and
445 coordinating experience in treating patients with rare conditions requiring complex
446 treatment allows the development of registries (ERKNET) and provides a platform for
447 research. Indeed, since the sample size required for studies can vary greatly, even the
448 pooling of relatively few cases can result in new opportunities for research [8]; of course,
449 the higher the number of cases registered, the wider the scope of potential studies. While
450 TransplantChild is an ERN focused on a treatment rather than a disease, the conditions of
451 rarity and complexity are satisfied. Moreover, given the rarity of childhood transplants,
452 and due to the similarities in immunosuppression protocols and complications, regardless
453 of the organ transplanted or underlying condition, pooling experience in treating patients
454 yields invaluable economies of scale for advancing knowledge and expertise on rare and
455 complex treatments.

456 Inevitably, members of networks will bring different degrees of expertise and capacity to
457 contribute. In addition to those centres that join ERNs as full members, having satisfied
458 the criteria of having the requisite expertise, others can join as 'affiliates' if these criteria
459 are partially satisfied. This allows centres in countries without the means to create expert

460 networks to gain access to knowledge in highly specialized centres in other European
461 countries, through referral of patients, and participation in publications and registry
462 activities.

463 **3.3.2. What are the factors influencing the success of ERNs?**

464 As noted, it is premature to undertake formal evaluations of the ERNs. We were advised
465 that a working group is currently developing a monitoring framework for all ERNs. Agreed
466 indicators (18 in total) aim to measure both patient-level and wider outputs, e.g.;
467 numbers of case uploaded to the CPMS system, cases closed, and publications
468 generated. Both interviewees indicated a need to assess potential challenges related to
469 the online patient management component of the ERN scheme, including equity of access
470 (i.e. is the system being used by referring centres who lack expertise and thus have the
471 greatest need, or is it only being used by hospitals with sufficient capacity and resources
472 to know how to use the new system?).

473 It is clearly too early to assess whether the ERN model has resulted in improvements to
474 patient care. Looking to the future, interviewees remarked that evaluation frameworks
475 should be extended to measure improvements in care for both patients referred to the
476 CPMS, as well as the wider group of patients treated at participating centres.

477 We sought insights into factors that might influence the success or otherwise of the
478 ERNs, while recognising the limited experience so far. In particular, it is important to
479 recognise that there is no clear definition of what "success" means for ERNs: in
480 extremely broad terms, they aim to improve treatment and care pathways for patients
481 by sharing information among health professionals, but this goal has not yet been
482 translated into specific, measurable indicators. This crucial issue is expanded on in the
483 following sections ("How to evaluate the effectiveness of ERNs?"), while here we focus on
484 the information gathered by asking about the effectiveness of ERNs in these general
485 terms.

486 The first factor influencing the success of ERNs was that the condition or the treatment
487 around which the network was developed should be both rare and complex. It was noted

488 that the current ERNs are not limited to rare diseases. The TransplantChild network
489 covers all cases of childhood transplants (i.e. a range of diseases/ conditions that lead to
490 the need for transplant). While not a discrete 'disease', transplants require complex
491 management, and post-transplants complications are similar enough to warrant
492 treatment within the same network.

493 A second factor was that those who might interact with ERNs, as health professionals or
494 patients, should be aware of their existence. Networks need to be active in promoting
495 themselves, in order to ensure that the network fulfils the potential to share knowledge
496 outside highly specialised centres. Coordinators remarked that in the initial stages of ERN
497 setup, centres who join the network first were often those who need it least, since they
498 were usually the centres with the highest concentration of expertise. ERKNET has
499 observed that representation from Eastern European countries is lacking. The real need
500 for knowledge-sharing comes from those outside the very highly specialised centres.
501 Effort is therefore needed by the network itself, as well as engagement with board of
502 member state representatives and national health systems, to promote awareness and
503 increase engagement by less developed specialist centres who may still be eligible for
504 membership or affiliate membership. TransplantChild has sought to increase awareness
505 through engagement with professional organizations and meetings (e.g. the Meeting of
506 Competent Authorities in transplantation), and by mapping children's transplant centres
507 in Europe.

508 A third factor was the need for well-functioning IT infrastructure. Interviewees raised
509 concerns about the CPMS system and argued for significant extra human resources in
510 order to facilitate uptake and use of the CPMS system by clinicians.

511 **3.3.3. What issues should be addressed to ensure proper functioning of ERNs?**

512 In addition, interviewees highlighted a set of criteria for effective working of the
513 networks. There is a need for robust referral mechanisms within national health systems
514 in order to ensure equitable access for patients to the centres in their countries that are
515 participating in ERNs. This involves clarity about responsibilities and access to resources

516 for patient management, particularly amid fears by national authorities about increased
517 healthcare costs resulting from easier access to highly specialised treatments.

518 We were told that member states were increasingly seeing the added value of ERNs,
519 given that in healthcare overall costs will often be saved if the best possible treatment is
520 given early on. However, given the lack of studies and the necessity to consider the costs
521 of operating ERNs, it is unclear to what extent this holds true for rare diseases – thus,
522 cost effectiveness is another crucial aspect to consider when evaluating ERNs, as will be
523 highlighted in the next section (“How to evaluate the effectiveness of ERNs?”).

524 As mentioned above, adequate funding is a critical issue. Significant investment is
525 needed in participating specialist centres, both for individual patient management and
526 wider activities such as the development of guidelines and registries, which require
527 additional resources beyond those provided as part of the ERN project. At present,
528 interviewees felt resourcing responsibilities were unclear, with clinicians picking up the
529 majority of the extra work, which was not necessarily being recognised by their host
530 institutions. In the case of ERKNET, alternative funding streams from the Commission
531 were used to finance registry development. The process of guideline development was
532 highly labour intensive, and largely product of “clinicians’ enthusiasm”. Also with regards
533 to other ERNs, the sources of funding are unclear [9], with private donors and patient-
534 organized campaigns still playing an important role in providing economic resources [10].
535 In addition, it is unclear who will provide for the treatment offered through ERNs [11].

536 This has clear implications for the sustainability of the concept [11], [12]: how are ERNs
537 supposed to treat patients and develop guidelines, let alone monitor the outcomes and
538 set up mechanisms for continuous improvement (as would be required of them in order
539 to assess their effectiveness)? Furthermore, how can they be expanded to other areas, if
540 there is no clear, long term, sustainable method of funding neither for existing ones?

541 Therefore, these funding issues must be addressed to guarantee the long-term existence
542 of ERNs, although we recognise that it is difficult for a variety of reasons. For instance,
543 finding funds can be complicated because, at least in some cases, it entails high costs

544 per se. In addition, it requires agreements between countries with very different
545 healthcare systems and a variety of third-party payers, with risk of free-riding occurring
546 – unless ERNs themselves set the price for treatments, which however can pose
547 problems of equity. Notwithstanding these difficulties, funding remains a critical issue
548 which must be solved in order for ERNs to continue functioning.

549 The final issue that has been highlighted in the discussion on ERNs is the need for a clear
550 management system and mechanism of governance [13]. Indeed, the task of ERNs is
551 extremely complex, since it entails gathering information from many different patients
552 and clinicians in different countries, carrying out research projects, and ultimately
553 gathering evidence on best practices and making it available to those involved in the
554 subject in all member states. All these activities are extremely difficult to carry out on
555 such a large scale, since there are few established systems for doing so within national
556 health systems [14]. For these reasons it has been suggested that coordinators should
557 ideally have expertise in networking, [12] with the ability to supervise all these different
558 activities and ensure that the objectives of ERNs are being reached, which will often
559 require support from a coordination team.

560 **3.4. How to evaluate the effectiveness of ERNs?**

561 As noted above, ERNs for rare diseases have been only implemented for one year: this is
562 too short to evaluate their performance or identify ways that they could be improved.
563 Thus, while in principle the ERN model can be a powerful tool to improve healthcare for
564 European patients, more time and more and robust data are required to evaluate their
565 impact.

566 Given the inability to reach conclusions about the effectiveness of the ERNs, some
567 insights into the issues that should be considered can be gained from a review of the
568 operation of reference networks that exist already within member states undertaken by
569 the European Observatory [3]. This identified five dimensions relevant to gaining a better
570 understanding of reference networks, their functions and the different shapes they
571 assume.

572 *Table 2 Dimensions of the operations of reference networks*

Governance	Objectives	Function	Material scope	Geographical scope
<ul style="list-style-type: none"> • Formal • Informal • Peer structure • Hub-and-spokes • Organic 	<ul style="list-style-type: none"> • Efficiency • Quality • Safety • (Equity) • Market position 	<ul style="list-style-type: none"> • Referral of patients • Transferring knowledge 	<ul style="list-style-type: none"> • Prevalence • Cost • Complexity • Rare • Critical • Chronic • Common 	<ul style="list-style-type: none"> • EU-wide • Transnational • National • Interregional • Regional

573 Source: W. Palm, I. Glinos, B. Rechel, and P. Garel, "Building European Reference
574 Networks in Health Care," *European Observatory on Health Systems and Policies*, 2013.

575

576 In addition, we propose a method that could be used to define what makes ERNs effective
577 and evaluate them, drawing on examples of existing evaluation systems.

578 In order to define what is an effective network, the first step is to define its mission. In the
579 broadest possible terms, ERNs seek to improve outcomes, experience, and care pathways
580 for patients with rare diseases. These networks should be able to facilitate and enhance
581 exchange of information and competences among health professionals, thus sharing best
582 practices and creating a virtual care community. The goal is to produce a multiplying effect,
583 that is, to achieve an improvement in the care of these patients greater than what would
584 be expected by simply adding together the single experts' abilities. Indeed, the sharing of
585 competence among network members should foster the creation of new knowledge, in the
586 form of guidelines, new clinical practices and recommendations, or scientific literature,
587 while also sharing advice on the diagnosis and treatment of patients in ways that would
588 never have been possible had the health professionals worked alone.

589 A second, but nonetheless important, objective is the ability for networks to become
590 integrated in the national health care systems. In other words, what is the use of enormous
591 amounts of expertise if they remain confined to the individual centres participating in the
592 network? These centres must be able to reach all patients in their territories – and in other
593 member states, if no national reference centre has been established – in order to really

594 make a difference to the care of these patients. Thus, ERNs are effective only in so far as
595 they are inclusive, proactively reaching out to the populations they serve.

596 Finally, a third objective of ERNS is to make this process of improving treatment and
597 integration cost-effective. Indeed, rare diseases raise considerable equity questions,
598 since they require a great amount of resources for a small group of people; this in turn
599 means that said resources cannot be used where they may have had more effect on the
600 overall health of the population. Therefore, it becomes essential for ERNs to become as
601 efficient and effective as possible, in order to compensate for the opportunity costs that
602 they inevitably entail. As a side note, it can also be highlighted that cost effectiveness is
603 also vital for the long-term sustainability and possible expansion of ERNs, given that their
604 sources of funding are so scarce.

605 Once these objectives have been agreed on, the second step is identifying how they can
606 be achieved and, therefore, which aspects need to be evaluated to define a network as
607 successful. In this sense, some examples can be drawn from national networks [3] and
608 from the experience of pilot ERNs [15], which have similar objectives and have focused on
609 similar issues. For simplicity, we will follow Donabedian's well-known structure-process-
610 outcome model, to have a clear framework in which to situate the actions undertaken. For
611 each step, we will briefly summarize the specific objectives to carry out and indicate
612 examples of how they have been applied to real-life situations.

613 1. Structure: in the first place, it is necessary to clearly define what are the resources
614 needed in reference centres and in the network for them to be able to deliver the highest
615 quality of care and to carry out their role in the network. Obviously, these resources vary
616 depending on the disease and therefore need to be defined on a case-by-case basis. Such
617 resources can be broadly divided into:

618 a. Equipment, such as diagnostic imaging appliances, or laboratories for
619 genetic testing. One particularly important requirement is the presence of an
620 information system and the information tools needed to get contact other experts,
621 since one of the fundamental characteristics of ERNs is to allow knowledge to travel,

622 rather than patients or physicians. To allow this to happen, the CPMS has been put
623 in place, so reference centres should have all the necessary resources to use it
624 without difficulties.

625 While the equipment required will vary according to the subject of the network, an
626 illustrative example is from the Spanish national health care system, where providers
627 aspiring to become reference centres for familial cardiomyopathies must have, for
628 example:

629 - Diagnostic and therapeutic techniques: 250 echocardiograms, 50 cardiac
630 MRI scanners, 100 Holter monitors, 100 units to conduct exercise stress tests;
631 capacity to perform Pharmacologic Induction Tests (flecainide, procainamide or
632 adrenaline); and capacity to carry out Genetic Studies for the range of conditions
633 included;

634 - Clinical consultations specially devoted to family cardiopathies.

635 - Other units/services: image diagnosis, echocardiograms and high quality MR
636 Unit/Service; unit for electrophysiology, arrhythmias, and induction-unmasking
637 techniques; genetics Service/Unit; haemodynamic Units (diagnostic and
638 therapeutic procedures) including alcohol septal ablation; etc.

639 b. Human resources, i.e. the professional expertise needed to deal with these
640 difficult cases.

641 Again, the Spanish health care system can give a fitting example with its reference centres
642 for cardiomyopathies, where providers are required to have, for example:

643 - Human Resources: 2 cardiologists dedicated to familial cardiomyopathies;
644 specialised nursing staff;

645 - Basic training for the members of the team: cardiologists with at least 3
646 years' experience in familial cardiomyopathies; nursing staff with more than 2
647 years' experience in cardiology tests and familial mapping.

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648 c. Research capacity, i.e. scientific reputation of the team of professionals
649 involved in the process of care, with reference to the quantity and quality of
650 scientific production in the last 5 years.

651 2. Process: this would probably be the aspect that can benefit the most from ERNs.
652 Indeed, most have focused on improving it by concentrating on common themes and
653 problems, which, according to the EUCERD report[15], are:

654 a. Sharing expertise for patient management: including the creation of tools
655 for case management, sharing expertise through IT media, and working with
656 patients and non-expert professionals to produce and disseminate. This is especially
657 important with rare diseases, where the patients themselves often know more
658 about their condition than the physician, potentially creating tensions in their
659 relationship [16]. Consequently, the type of expertise that needs to be shared is
660 not related to information on the disease, but also to the ways in which patients
661 can be engaged respectfully and productively.

662 The ERN for neurological diseases (ERN-RND) has published a very precise outline of its
663 objectives, the specific goals each seeks to achieve, and the timing over which to achieve
664 them [17]. Specific objectives for sharing of expertise include:

665 - Define currently available education and training resources, by compiling a
666 web directory of currently available education and training resources for
667 professionals/families, by month 12;

668 - Establish an alert mechanism for rapid dissemination of new information, by
669 establishing a list of high quality meetings/conferences and alert reports, by month
670 36;

671 - Identify and fulfil patients' and professionals' future education/training
672 needs in a survey of different stakeholders by month 12.

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673 b. Developing standards of care: this includes producing best practice
674 guidelines for diagnosis and clinical management and implementing these
675 guidelines and providing training in their use.

676 Some examples from the ERN-RND include:

677 - Evaluation of existing guidelines and pathways by a trained guideline expert
678 group, with a priority list for new pathways and guidelines, by month 12;

679 - Improve patient care through use of high quality patient guidelines, by
680 publication of a guideline list, by month 48;

681 - Develop cross-border pathways, by a framework report on cross-border
682 pathways, by month 60.

683 c. A third aspect, not mentioned by the EUCERD report but that is nonetheless
684 important, is the creation of a clinical pathway for patient management. Indeed, the initial
685 responses from the survey on integration [18] highlight how there is no agreed referral
686 system for patients inside member states, but rather it is left to each physician to refer
687 their patients. Therefore, it would be important to define a clear process through which
688 patients are managed, from their primary care physician to highly specialized treatment,
689 in order to optimise efficacy and efficiency at each step of care.

690 Some examples from the ERN-RND include:

691 - Consent and share diagnostic flowcharts, by month 12-60;

692 - Develop generic diagnostic pathway for genetically caused neurological diseases by
693 month 36;

694 - Improve access to high quality care by a report on implemented awareness
695 strategies for ERN-RND, by month 12-60.

696 d. In the process of care, networks could establish a system to share diagnostic and
697 therapeutic processes, by providing second and/or multiple opinions for patients taking
698 advantage of information technology.

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699 3. Outcome: finally, it is necessary for networks to find a way to evaluate their work,
700 highlighting problems where they exist, but also documenting improvements brought
701 about by the network. The main focus in this phase is on the objectives of the reference
702 networks, namely:

703 a. The provision of high quality care: networks should be able to provide better
704 care than that which would otherwise be available to the patient. This can be
705 evaluated using outcome indicators, which need to be defined for each disease, but
706 also patient reported outcome and experience measures.

707 b. Equity in the provision of care: networks aim to ensure that all citizens are
708 receiving quality care based on need, not geographical location, social status or
709 income. This could be considered by evaluating the level of awareness by physicians
710 of networks and referral processes, or the measures put in place by networks to
711 make themselves better known.

712 c. Cost-effectiveness in the provision of care: networks should ensure that
713 resources are being spent in a responsible and effective manner, in order to actually
714 benefit patients and make the use of resources for rare diseases, rather than for
715 more prevalent conditions, meaningful. This assessment is more complicated, since
716 it raises moral issues (what is the level of effectiveness which justifies the extra
717 resources?), but one method could be confronting healthcare for patients with rare
718 diseases before and after ERNs, in order to understand whether and how much it
719 has improved.

720 The framework that has been outlined in the previous paragraphs can be useful in agreeing
721 criteria to define how effective a network is. The core belief behind it is that it is necessary
722 to find practical, measurable aspects to understand how well a network is performing. A
723 second fundamental aspect is to make the entire evaluation process as public and
724 transparent as possible, as numerous experiences have shown how reputation, more than
725 economic incentives, is a key factor in driving performance in the health care sector [19].

726 The question of what an effective network is, therefore, has no clear answer: it is necessary
727 to establish its goals and, from them, derive the objectives to pursue. The achievement of
728 these objectives needs to be evaluated with measures of outcome, and the result of this
729 evaluation can then form the basis for the development of new objectives and measures,
730 in what (hopefully) becomes a virtuous cycle. Therefore, this framework can be used when
731 evaluating ERNs as well as any further application of them, in part or as a whole: clearly,
732 however, if the ERN model were to be adapted to other realities, a new discussion on its
733 objectives would be needed, leading to different indicators measuring its success.

734 **3.5. Are there other areas where European Reference networks might be**
735 **appropriate?**

736 One question that naturally arises when considering the results obtained by ERNs is: can
737 a similar approach be used to tackle other healthcare problems? Can it be extended to
738 other settings and to the treatment of other conditions? To answer these questions, first
739 it is necessary to reflect on the reason for the creation of ERNs, the methods they have
740 used, and whether there are sufficient similarities with other conditions to suggest that
741 the ERN model might be appropriate. Second, it is necessary to ask, if there is a case for
742 considering the ERN model, whether there are alternative, more appropriate mechanisms
743 to achieve the relevant goals.

744 Fundamentally, the objective behind the creation of ERNs is to improve healthcare for
745 patients suffering from rare diseases, in terms of quality of the services provided,
746 efficiency, cost-effectiveness, and ease of access [20]. The need to resort to a European
747 network, rather than implementing national measures in each country, has arisen
748 because of the extreme scarcity of cases: it is very difficult to provide adequate health
749 care for complex problems when there are extremely few patients, as is the case
750 especially in smaller countries [16], [21]. Referral of all patients to a single network
751 makes it possible to centralize knowledge and resources, and also accumulate a sufficient
752 number of cases to evaluate outcomes and establish best practices [15], [22]. Indeed,
753 since knowledge about rare diseases is scarce and continually evolving thanks to
754 advances in research [23], one of the main activities of ERNs is the sharing of knowledge

755 to improve treatment of patients [15]. For patients, this translates into better quality of
756 care and easier access to treatment, since patients can benefit from a team of experts
757 without having to move to distant hospitals [24].

758 However, the goal of improving healthcare is hardly exclusive to ERNs, but rather is one
759 of the main objectives of all national health systems. Therefore, it is legitimate to ask
760 whether a similar approach can be useful in other circumstances or settings, to improve
761 other features of healthcare.

762 One element of ERNs is the exchange of knowledge on how to treat certain conditions.
763 Without a structured system, such as that created by the ERNs, it is difficult to know
764 whether different centres are providing care that is consistent with best practice, to the
765 extent that this is known. In the absence of such a system, it is likely that there will be
766 variation in models of care. This variation is not confined to rare diseases. It is
767 widespread in all sectors of healthcare with unwarranted variation, i.e. service usage
768 differences among providers and regions that cannot be attributed to differences in
769 patient needs or preferences but to other factors [25], [26]. These differences can be
770 due to unequal access to services, disagreement about the best medical practice
771 (although treatments that have been proven effective have a great deal of regional
772 variation as well), different medical practice styles, or availability of resources [25]–[28].
773 These unwarranted forms of variation have a negative impact on the efficacy and
774 efficiency of healthcare [29]: for example, they can indicate lack of conformity to clinical
775 guidelines, a lack of equity in access to care, or a waste of money in ineffective
776 procedures [27]. For these reasons, reducing unwarranted variation is a priority for
777 healthcare systems as they pursue their objective of providing universal and equal
778 coverage of high quality [29]. Therefore, going back to the original question, one could
779 ask whether the measures used by ERNs to solve the problems related to rare diseases
780 can also be useful in addressing problems of geographical variation.

781 The approach adopted by ERNs to address the issues related to care for rare diseases, as
782 outlined above, is knowledge sharing and benchmarking. This implies that performance

783 of the healthcare system should be evaluated in a transparent and systematic manner in
784 order to identify areas of best practice and those which need to be improved on [30].
785 Then the results must be disclosed to the public: making the results available offers the
786 opportunity to share best practices and increases the physicians' awareness of the
787 quality of their performance [31]. In addition, a "reputation effect" [19] is set in motion,
788 encouraging professionals to take steps, where feasible, to improve their performance
789 [32], including advocating for a better use of resources, by investing them where they
790 can yield better results (which means, in the case of ERNs, directing them towards
791 international cooperation rather than towards less effective national care pathways).
792 This can be done through benchmarking, i.e. comparing one's results with those of the
793 best performer, learning how they are achieved, and applying the lessons learnt to
794 improve [33]. These actions can lead to a significant improvement in both quality and
795 economic sustainability of healthcare [30]; in addition, they have been shown to improve
796 equity by providing means to reduce unwarranted geographical variation [27].
797 The question then is whether the ERN model might be appropriate as a means of
798 reducing unwarranted variation, offering a forum in which those managing different
799 conditions could share experience.
800 We do not find this argument persuasive. Except in small countries, there is no obvious
801 need to create an international network to function: on the contrary, there are reports of
802 implementation of these measures at a local and regional level [26], [34], with excellent
803 results even for common conditions, such as diabetic foot [30]. In other words, once
804 there is a sufficient number of cases, the methods used by ERNs can be easily applied at
805 a national, regional or even local level, since the focus is not on gathering information
806 per se, but rather on using the information to improve healthcare, and increasing the
807 amount of information available is useful only if it can change decisions on treatment.
808 Indeed, the necessity for international cooperation has only arisen for rare diseases
809 because the volumes are too small to gather a reliable amount of data and identify
810 differences in quality of care. Moreover, conditions with a higher prevalence can

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811 implement the same actions as ERNs without having to face all the challenges linked to
812 international cooperation [11]. Even if there is a desire for international collaboration, for
813 example to develop guidelines for complex conditions or indications for new treatments,
814 this can often be achieved equally well by networks developed within other frameworks,
815 for example by European scientific and professional organisations, many of which are
816 already engaged in such mechanisms. While these activities can draw on the experiences
817 from the ERNs in due course, they are substantially different: they are not defined by
818 having a small number of cases, but rather by the fact that international cooperation
819 would make tackling these issues much easier.

820 A second issue is whether the ERN model can promote access to healthcare for
821 vulnerable communities (such as cross-border communities that are currently not
822 adequately covered by national health services), small countries, remote areas, and/or
823 EU border regions, all of which may suffer from inadequate access to high-quality
824 healthcare that is not limited to rare diseases. Again, there are many other mechanisms
825 that can address these issues, including the now numerous examples of cross-border
826 collaboration and it is not clear what the ERN model would add to them.

827 There have also been several proposals to create ERNs for other conditions, issues, or
828 population groups. We now review some illustrative examples of these proposals.

829 It has been suggested that it could be appropriate to create an ERN for humanitarian
830 crises. However, that would, to some extent, duplicate the role of the existing European
831 Emergency Response Capacity and the European Medical Corps. The panel was also
832 informed about a range of bilateral and multi-lateral agreements to enhance disaster
833 preparedness, such as those to ensure access to hospital beds in neighbouring countries
834 in cases of earthquakes other disasters. Thus, there are many alternative, and more
835 appropriate mechanisms that can be employed other than an ERN.

836 Another proposal is to create a network to improve the care of homeless people. Again, it
837 is not clear how this relates to the ERN concept. Feantsa, the European Federation of
838 national organisations working with the homeless, drew our attention to how, apart from

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839 Finland and Norway, all EEA countries have seen a rise in homelessness with, for
840 example, a 150% increase in Germany from 2014 to 2016, a 20% rise in the number of
841 people in emergency shelters in Spain of the same period and an 8 % increase in
842 Denmark between 2015 and 2017 [35]. The panel agrees that the extreme health
843 inequalities homeless people face mean that homelessness is a health issue [36] and
844 currently many health care systems across Europe are failing people who are homeless.
845 However, the consequences of homelessness are likely to be highly context dependent,
846 influenced by what services are available to homeless people and the pathways into and
847 out of homelessness and it is not clear how the ERN would address this issue.

848 Although all these initiatives have something in common, they are all related to problems
849 of rather small groups in the European Union (e.g. the homeless population counts for
850 approximately 0.075% of the population at any given time in Europe), and in this sense
851 there is a certain quantitative similarity with the situation of people with "rare diseases",
852 the panel does not think that it is appropriate to copy the ERN model to address those
853 needs. The European Reference Network-model is a strong "sui generis"-approach,
854 suitable for patients with "rare diseases" as it concentrates expertise and knowledge, and
855 acts as a super-specialised advisory level to improve diagnosis and treatment of people
856 with those diseases.

857 With other challenges (e.g. refugees, homeless people, disaster interventions) the needs
858 of those affected should be addressed directly by offering appropriate service provision.

859 That being said, the panel urges member states and the European Union to optimise the
860 care for these groups and the preparedness to provide acute responses, through the
861 creation of platforms and "Learning Communities" in Europe with participation of multiple
862 member states and experts in the different domains, in order to improve access in
863 quality of these vulnerable people. This action certainly relates to the ambition of the
864 recently adopted European Pillar of Social Rights. Creating these platforms and "learning
865 communities" around these topics, providing the needed evidence through practice-based
866 research, will enable health care providers in Europe to better serve the needs of these

867 vulnerable nations. In other words, there are many possible ways to share information
868 and undertake action to tackle healthcare and social issues: rare diseases have been
869 addressed using the ERN framework, while other problems can benefit more from other
870 forms of cooperation – and it is of the utmost importance that these communities and
871 networks are put in place, in order to best deal with them.

872 In summary, the current criteria for establishing a ERN, as a means of improving the
873 management of patients with rare and complex diseases, was appropriate. The ERN
874 concept does not address other issues raised for consideration, such as remote areas and
875 border regions, or the development of new medicines or interventions, for which there
876 are alternative and more appropriate mechanisms. The Expert Panel was also asked
877 about the scope to extend the scope of ERNs to other areas such as the care of people
878 who are homeless or emergency situations. In both cases, there are better alternative
879 mechanisms to achieve the intended goals. However, the panel does accept that
880 improved responses are needed to meet the needs of homeless-people, refugees and
881 other vulnerable groups, and to increase preparedness in relation to disaster-
882 interventions through specific “European Learning Communities”.

883 **3.6. Should the ERN model be used as a whole?**

884 The application of the ERN model as a whole or part of the model will depend on the
885 needs to which the model is expected to respond. The ERN model can tackle one, several
886 or all the main fields for action currently identified for rare diseases: research and
887 innovation, generating and sharing evidence, developing guidelines, and training.

888 Research is of paramount importance in the field of rare diseases, given how little is
889 known about them: ERNs should bring to a stronger EU research governance, based on
890 systematically identified research gaps and priorities [14]. In the field of rare diseases an
891 example is the EU funded project RARE-Bestpractices [37]. The project has produced a
892 specific resource (RareGAP) that collates validated research recommendations for
893 diagnosis and treatment of rare diseases, identified from high quality systematic reviews

894 [38]. These validated research recommendations can feed the research agenda on rare
895 diseases.

896 In a similar way, an active cross-border network can be a valuable tool to pinpoint the
897 need for generating new evidence also for conditions other than rare diseases.

898 Consequently, it will be important to find a consistent way to feed the inputs of the ERNs,
899 as research needs, into the EU research agenda.

900 Clinical guideline development can be highlighted as a priority topic. In fact, Directive
901 2011/24/EU [point (iii) of Act. 12(4)(a)], the Commission Delegated Decision
902 2014/286/EU and the Commission Implementation Decision 2014/287/EU require that
903 ERNs and the health care providers wishing to join ERNs should have the capacity to
904 develop and implement trustworthy clinical guidelines [20], [39], [40].

905 Production and implementation of clinical guidelines in the EU is far from satisfactory.

906 Few countries have well-established systems in place, sustained by national or local
907 regulations that provide mechanisms for quality assurance, implementation and use.

908 Many countries still rely on sporadic initiatives based on unclear processes, others have
909 insufficient capacity for evidence-based guideline development or, even if they have the
910 capacity, they lack a coordination of a central agency [41]. The ERNs offer an excellent

911 opportunity (albeit not the only one) to (i) consider the importance of devoting resources
912 to build an efficient system for developing and implementing guidelines, and (ii) ascertain

913 the actual capacity of healthcare providers to produce trustworthy guidelines according to
914 international standards. Since ERNs are expected to pursue a cooperative approach

915 aimed at sharing expertise, they can contribute to initiating processes to establish

916 European cooperation structures. This in turn can contribute to the production of clinical

917 guidelines in accordance to robust international standards, leading to more equitable care

918 across countries and a wider access for patients to care.

919 However, it should be noted that the production of guidelines is hardly the only objective

920 of ERNs, but rather it should be one of the end products of their activity. Indeed, clinical

921 guidelines are known to be often ignored or misinterpreted, even in the case of the most

922 common diseases: 30-40% of patients do not receive effective treatments, while up to
923 25% of them receive unnecessary or potentially harmful ones [42]. The varying degrees
924 of guideline application can also be seen when examining geographical variation in
925 healthcare, of which it is a main determinant [27]. Because of this, guideline
926 development and dissemination are not the only focus of ERNs, but rather they also
927 focus on other aspects of rare diseases where they can make a difference. Conversely,
928 there are other ways to highlight the importance of sharing information and producing
929 valid guidelines, without having to resort to ERN (such as highlighting unwarranted
930 variation) [43].

931 Another characteristic of ERNs is the fact that training and e-learning are priority topics:
932 the implementation of ERNs requires the availability of trained professionals at all levels
933 of healthcare; therefore, ERNs might be focussed on up-to-date training of healthcare
934 professionals across EU, possibly in conjunction with empowerment of patients and
935 citizens.

936 Finally, a peculiar characteristic of ERNs, albeit one that has not been formally
937 recognised, is the high degree of patient involvement: representatives of patients and
938 their families are members of the boards of ERNs [44] and patient advocacy groups
939 participate in ERN activities [24], up to the point of organising publicity campaigns [10].
940 Because of this, another focus of the "ERN model" should be to further increase the
941 participation of patients in the diagnostic, treatment and follow-up processes, by
942 registering and sharing their experiences, thereby improving their care. This can be
943 facilitated with greater use of patient reported experience and outcome measures
944 (PREMs and PROMs), already in use in various national health systems with varying, but
945 generally good outcomes [45]. They would be especially useful in the field of rare
946 diseases, since patients are highly involved in their healthcare [16] and can therefore
947 give extremely important insights.

948 In summary, while it is not possible to come to definitive conclusions about the role of
949 ERNs in we examined the scope of the ERNs research and guideline development, there

950 would seem to be considerable scope for incorporating these additional roles beyond the
951 immediate objective of providing advice on individual patients. This will, however, require
952 dedicated resources, some of which will have to come from other sources.

953 **3.7. How should national health systems integrate such networks into their**
954 **national framework?**

955 Properly implemented ERNs are not an obstacle to the overall functioning of the national
956 healthcare systems; indeed, the added value of ERNs is evident as long as the focus is on
957 information and knowledge exchange and as long as the patient is only treated in the
958 “foreign” system when it is appropriate and justified. The main challenge is to provide
959 evidence of the added value of these networks for all players, in particular the member
960 states. For the first time, member states will not only cooperate with one or two others
961 on the basis of framework agreements and using existing administrative arrangements,
962 but with at least 8 member states whose health systems differ. We need to identify and
963 monitor indicators of relevance for the individual players, especially health authorities
964 and insurers in member states, in order to evaluate the entire process [46]. The diversity
965 of systems within member states makes it impossible to provide detailed guidelines for
966 how this can best be made to work. This is an area where it will be important to monitor
967 the implementation of the existing ERNs and disseminate the lessons that arise from
968 their experiences.

969 At this point it is important to consider the financial sustainability of the ERN model in the
970 light of constraints facing some national health systems. At present, individual cross-
971 border patient mobility takes place on a small scale. According to the May 2015
972 Eurobarometer, entitled “Patients’ rights in cross-border healthcare in the European
973 Union”, only 5% of EU citizens obtained treatment abroad [46]. The consequences and
974 the potential financial burden associated with the establishment of the ERNs need
975 further investigation and more time [46]. The optimal way to finance ERNs in the
976 medium-long term remains unresolved: as highlighted above, further elaboration will be
977 needed to achieve long-term sustainability. This issue may be a problem for all EU
978 member states, but especially so for some of them.

979 Finally, the ERN model could usefully be applied within a national health system, or even
980 a regional section of a health system, when dealing with common diseases. Indeed, in
981 some cases the application of the ERN model does not need an EU dimension: it might be
982 translated with equal or higher effectiveness to a national or regional dimension [11].

983

984 **3.8. Proposed criteria for establishing ERNs**

985 In the light of the considerations described above, the panel proposes a set criteria for
986 creating a European network. The panel considered that four criteria were relevant:

- 987 a) The condition/ intervention must be rare (however defined). The panel saw no
988 justification for creating a pan-European infrastructure for common conditions
989 where relevant expertise is widely available.
- 990 b) The condition must occur throughout large parts of the EU. Thus, a condition
991 could be rare on account of its concentrating in a few families with a particular
992 genetic anomaly but if they all lived in the same region then it is likely that
993 expertise would also be concentrated and there would be little added value of a
994 Europe-wide network. Similarly, if cases were concentrated in a few member
995 States, bilateral or multi-lateral arrangements might be more appropriate. There
996 may be some occasions in which a condition, especially infectious ones, that is not
997 uncommon in some member states, such as tick-borne encephalitis, is seen in
998 travellers who move to other countries where it is not endemic. However, again,
999 there will be alternative mechanisms available and, in cases such as this, the
1000 surveillance networks working with ECDC may be able to play a role.
- 1001 c) The condition must be complex and there must be incomplete knowledge,
1002 benefitting from consultation among specialists. A condition may be rare but its
1003 management may be straightforward and uncontentious. It would not justify a
1004 ERN model.

1005 d) The establishment of a ERN should only be undertaken when there is no existing
1006 alternative mechanism to obtain access to relevant expertise or other forms of
1007 collaboration or where a simpler solution is not possible.

1008

1009 **CONCLUSIONS AND RECOMMENDATIONS**

1010

1011 ERNs have the potential to facilitate cooperation at the EU level in particular medical
1012 domains with a focus on areas where expertise is scarce, facilitating access to diagnosis
1013 and to high-quality health care, especially in the area of rare diseases. As such, the
1014 establishment of ERNs appears to have been, at least potentially, among the most
1015 important European cooperative initiative for decades.

1016 ERNs seek to provide an important mechanism be powerful tools to support a consistent,
1017 up-to-date, cost-effective and evidence-based healthcare for those with rare diseases
1018 across the EU.

1019 Potential points of strength of the ERN model include, in particular, the added value of
1020 knowledge sharing and the integration of the ERN system in the national health services
1021 of each MS.

1022 The ERN model stems from the principle of subsidiarity and added value of action at
1023 European level: therefore, in principle, all those healthcare areas that may benefit from
1024 cross – border cooperation could be interested, including those caring for people with
1025 complex, high-prevalence diseases and cross-border communities with increased health
1026 risks (homeless, refugees, etc.). On the other hand, ERNs for rare diseases have been
1027 implemented for only one year. This is too short to make an evaluation of outcomes,
1028 costs and points for improvement.

1029 ERN financing in the medium-long term is also a health policy issue; further elaboration
1030 may be needed to optimize the long-term sustainability of ERN. The sustainability issue
1031 may be a problem for all EU member states, especially for some of them. Moreover,
1032 ERNs require extended cooperation among at least 8 MS, whose health systems can be
1033 very different, making such cooperation challenging to achieve.

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1034 However, properly implemented ERNs are not an obstacle to the overall functioning of
1035 the national healthcare systems; indeed, the added value of ERNs is evident as long as
1036 the focus is on information and knowledge exchange. The main key challenge is to
1037 provide evidence, by means of adequate indicators, of the added value of these networks
1038 for all players, in particular the MS.

1039 Based on the above considerations, the extension of the ERN model to diseases other
1040 than rare diseases is currently considered premature.

1041 More data are required on benefits and costs of ERN for rare diseases, in order to achieve
1042 a more robust body of evidence to support the extension of the model to other health
1043 conditions. Such conditions likely have features that would call for adaptations of the ERN
1044 model currently implemented for rare diseases: such features include (but are
1045 necessarily limited to) relatively high frequency, multifactorial aetiology, multiple clinical
1046 phenotypes under the same diagnostic umbrella and multiple, sometimes divergent,
1047 approaches to diagnosis and treatment.

1048 The application of the ERN model as a whole or part of the model will depend on the
1049 needs to which the model is expected to respond in fields other than rare diseases.
1050 Therefore, the ERN model can tackle one, several or all the main fields for action
1051 currently identified for rare diseases: developing guidelines, training, research and
1052 innovation, generating and sharing evidence. Clinical guideline development can be a
1053 priority topic as requested by the Directive 2011/24/EU. Indeed, the development [47],
1054 production and implementation [48] of clinical guidelines in the EU is far from
1055 satisfactory. ERNs can support initiating processes to establish European structures of
1056 cooperation in producing guidelines, pursued through structured knowledge sharing; this
1057 could lead to more equitable care across countries and a wider access for patients to
1058 care, including either rare and frequent conditions.

1059 In addition, an active cross-border network can be a good means to pinpoint the needs
1060 for generating new evidence; it will be important to find a consistent way to feed the
1061 inputs of the ERNs, as research needs, into the EU research agenda.

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1062 It is recommended that well-designed, independent research is carried out on the impact
1063 of ERN on healthcare of rare diseases including the clinical (e.g., improved diagnosis),
1064 scientific (e.g., added value of shared knowledge) and social (e.g., benefits for patient's
1065 life quality, sustainability) aspects [20]; the adaptations that may be needed in order to
1066 fit the ERN model to diseases other than rare diseases.

1067 Finally, the implementation of ERN, for rare diseases as well as for other conditions,
1068 requires the availability of trained professionals at all levels of healthcare; it is, therefore,
1069 recommended that the lessons learned from ERNs should be reported and disseminated
1070 in ways that can feed into in the undergraduate through to post-graduate and
1071 professional education of the healthcare professions.

1072

DRAFT

1073 **REFERENCES**

- 1074 [1] "Work of the ERNs." [Online]. Available: https://ec.europa.eu/health/ern/work_en.
1075 [Accessed: 17-Aug-2018].
- 1076 [2] "Speech at the high level conference 'Health in the digital society. Digital society
1077 for health.'" [Online]. Available:
1078 [https://ec.europa.eu/commission/commissioners/2014-
1079 2019/andriukaitis/announcements/high-level-conference-health-digital-society-
1080 digital-society-health-tallinn-tuesday-17-october-2017_en](https://ec.europa.eu/commission/commissioners/2014-2019/andriukaitis/announcements/high-level-conference-health-digital-society-digital-society-health-tallinn-tuesday-17-october-2017_en). [Accessed: 17-Aug-
1081 2018].
- 1082 [3] W. Palm, I. Glinos, B. Rechel, and P. Garel, "Building European Reference
1083 Networks in Health Care," *Eur. Obs. Heal. Syst. Policies*, 2013.
- 1084 [4] OECD/EU (2016), "Health at a Glance: Europe 2016 - State of Health in the EU
1085 Cycle," *OECD Publ.*, 2016.
- 1086 [5] (EXPH) Expert Panel on effective ways of investing in Health, "Report on Cross-
1087 border Cooperation," 2015.
- 1088 [6] "Council conclusions on Encouraging Member States-driven Voluntary Cooperation
1089 between Health Systems," 2017. [Online]. Available:
1090 <http://data.consilium.europa.eu/doc/document/ST-10381-2017-INIT/en/pdf>.
1091 [Accessed: 17-Aug-2018].
- 1092 [7] "European Commission: summary on ERNs." [Online]. Available:
1093 https://ec.europa.eu/health/ern_en. [Accessed: 26-Aug-2018].
- 1094 [8] P. J. Kelly, A. C. Webster, and J. C. Craig, "How many patients do we need for a
1095 clinical trial? Demystifying sample size calculations," *Nephrology*, vol. 15, no. 8,
1096 pp. 725–731, 2010.
- 1097 [9] C. E. M. Hollak *et al.*, "Position statement on the role of healthcare professionals,
1098 patient organizations and industry in European Reference Networks," *Orphanet J.
1099 Rare Dis.*, vol. 11, no. 1, pp. 1–7, 2016.
- 1100 [10] M. Laimer, G. Pohla-Gubo, A. Diem, C. Prodinger, J. W. Bauer, and H. Hintner,
1101 "Epidermolysis bullosa House Austria and Epidermolysis bullosa clinical network:
1102 example of a centre of expertise implemented in a European reference network to
1103 face the burden of a rare disease," *Wien. Klin. Wochenschr.*, vol. 129, no. 1, pp.
1104 1–7, 2017.
- 1105 [11] N. Azzopardi-Muscat and H. Brand, "Will European Reference Networks herald a
1106 new era of care for patients with rare and complex diseases?," *Eur. J. Public
1107 Health*, vol. 25, no. 3, pp. 362–363, 2015.
- 1108 [12] N. Kamel, "European reference networks: Moving towards a tangible outcome of
1109 the European Union's cross-border healthcare directive?," *Eur. Respir. J.*, vol. 48,
1110 no. 6, pp. 1564–1568, 2016.
- 1111 [13] T. Andersen, Y. Le Cam, and A. Weinman, "European Reference Networks for rare

- 1112 diseases: The vision of patients," *Blood Transfus.*, vol. 12, no. Supplement 3, pp.
1113 626–627, 2014.
- 1114 [14] C. Morciano, P. Laricchiuta, D. Taruscio, and H. Schünemann, "European reference
1115 networks and guideline development and use: Challenges and opportunities,"
1116 *Public Health Genomics*, vol. 18, no. 5, pp. 318–320, 2015.
- 1117 [15] European Union Committee of Experts on Rare Diseases, "EUCERD Report:
1118 Preliminary analysis of the outcomes and experiences of pilot European Reference
1119 Networks for rare diseases," 2011.
- 1120 [16] K. Budych, T. M. Helms, and C. Schultz, "How do patients with rare diseases
1121 experience the medical encounter? Exploring role behavior and its impact on
1122 patient-physician interaction," *Health Policy*, vol. 105, no. 2–3, pp. 154–164,
1123 2012.
- 1124 [17] "ERN-RND and Activities." [Online]. Available: [http://www.ern-](http://www.ern-rnd.eu/information/ern-rnd-and-activities/)
1125 [rnd.eu/information/ern-rnd-and-activities/](http://www.ern-rnd.eu/information/ern-rnd-and-activities/). [Accessed: 20-Apr-2018].
- 1126 [18] ERN working group, "Initial responses from ERN Integration Survey." .
- 1127 [19] G. Bevan, A. Evans, and S. Nuti, "Reputations count: why benchmarking
1128 performance is improving health care across the world," *Heal. Econ. Policy Law*,
1129 no. Feb, pp. 1–21, 2018.
- 1130 [20] "2011/24/EU: Directive of the European Parliament and of the Council of 9 March
1131 2011 on the application of patients' rights in cross-border healthcare." .
- 1132 [21] European organisation for rare diseases (EURORDIS), "The voice of 12,000
1133 patients: experiences and expectations of rare disease patients on diagnosis and
1134 care in Europe," 2009.
- 1135 [22] T. Evangelista *et al.*, "The context for the thematic grouping of rare diseases to
1136 facilitate the establishment of European Reference Networks," *Orphanet J. Rare*
1137 *Dis.*, vol. 11, no. 1, pp. 1–8, 2016.
- 1138 [23] V. Héon-Klin, "European Reference networks for rare diseases: What is the
1139 conceptual framework?," *Orphanet J. Rare Dis.*, vol. 12, no. 1, pp. 1–9, 2017.
- 1140 [24] R. Wijnen, S. M. Anzelewicz, C. Petersen, and P. Czauderna, "European Reference
1141 Networks: Share, Care, and Cure-Future or Dream?," *Eur. J. Pediatr. Surg.*, vol.
1142 27, no. 5, pp. 388–394, 2017.
- 1143 [25] OECD, "Geographic variations in health care: what do we know and what can be
1144 done to improve health system performance?," *OECD Heal. Policy Stud.*, 2014.
- 1145 [26] J. E. Wennberg, E. S. Fisher, and J. S. Skinner, "Geography and the debate over
1146 medicare reform," *Health Aff.*, vol. 22, no. SUPPL., 2003.
- 1147 [27] J. Appleby, T. Lyscom, V. Raleigh, F. Frosini, G. Bevan, and H. Gao, "Variations in
1148 health care: the good, the bad and the inexplicable," *King's Fund*, pp. 1–40, 2011.
- 1149 [28] J. E. Wennberg, "Understanding geographic variations in health care delivery.," *N.*
1150 *Engl. J. Med.*, vol. 340, no. 1, pp. 52–53, 1999.

- 1151 [29] S. Nuti and C. Seghieri, "Is variation management included in regional healthcare
1152 governance systems? Some proposals from Italy," *Health Policy*, vol. 114, no. 1,
1153 pp. 71–78, 2014.
- 1154 [30] S. Nuti, B. Bini, T. Grillo Ruggieri, A. Piaggese, and L. Ricci, "Bridging the gap
1155 between theory and practice in integrated care: the case of the diabetic foot
1156 pathway in Tuscany," *Int. J. Integr. Care*, vol. 16, no. 2, p. 9, 2016.
- 1157 [31] S. Leatherman, D. McCarthy, B. T. Collopy, C. Mebius, and J. Coles, "Public
1158 disclosure of health care performance reports: experience, evidence and issues for
1159 policy," *International Journal for Quality in Health Care*, vol. 11, no. 2. pp. 93–105,
1160 1999.
- 1161 [32] D. M. Berwick, B. James, and M. J. Coye, "Connections between quality
1162 measurement and improvement," *Med. Care*, vol. 41, no. Supplement, p. I-30-I-
1163 38, 2003.
- 1164 [33] A. Ettorchi-Tardy, M. Levif, and P. Michel, "Benchmarking: a method for continuous
1165 quality improvement in health," *Health Policy*, vol. 7, no. 4, pp. e101–e119, 2012.
- 1166 [34] S. Nuti and M. Vainieri, "Managing waiting times in diagnostic medical imaging,"
1167 *BMJ Open*, vol. 2, no. 6, 2012.
- 1168 [35] Eurodiaconia, "Feantsa overview on housing exclusion: homelessness increase
1169 across Europe.," 2018. [Online]. Available:
1170 [https://www.eurodiaconia.org/2018/03/feantsa-overview-on-housing-exclusion-
1171 homelessness-increase-across-europe/](https://www.eurodiaconia.org/2018/03/feantsa-overview-on-housing-exclusion-homelessness-increase-across-europe/). [Accessed: 26-Jul-2018].
- 1172 [36] R. W. Aldridge *et al.*, "Morbidity and mortality in homeless individuals, prisoners,
1173 sex workers, and individuals with substance use disorders in high-income
1174 countries: A systematic review and meta-analysis," *Lancet*, vol. 391, no. 10117,
1175 pp. 241–250, 2017.
- 1176 [37] "Final report summary - RARE-BESTPRACTICES (platform for sharing best
1177 practices for management of rare diseases)." [Online]. Available:
1178 https://cordis.europa.eu/result/rcn/201708_en.html. [Accessed: 23-Jun-2018].
- 1179 [38] "RareGAP." [Online]. Available: <http://rbpresearch.eu/>. [Accessed: 23-Jun-2018].
- 1180 [39] "2014/286/EU: Commission Delegated Decision of 10 March 2014 setting out
1181 criteria and conditions that European Reference Networks and healthcare providers
1182 wishing to join a European Reference Network must fulfil." .
- 1183 [40] "2014/287/EU: Commission Implementing Decision of 10 March 2014 setting out
1184 criteria for establishing and evaluating European Reference Networks and their
1185 Members and for facilitating the exchange of information and expertise on
1186 establishing and evaluating." .
- 1187 [41] H. Legido-Quigley *et al.*, "Clinical guidelines in the European Union: Mapping the
1188 regulatory basis, development, quality control, implementation and evaluation
1189 across member states," *Health Policy*. 2012.

- 1190 [42] J. Grimshaw, M. Eccles, and J. Tetroe, "Implementing clinical guidelines: current
1191 evidence and future implications," *J Contin Educ Heal. Prof*, vol. 24 Suppl 1, pp.
1192 S31-7, 2004.
- 1193 [43] J. Appleby *et al.*, "Variations in healthcare: The good, the bad and the
1194 inexplicable," *King's Fund*, pp. 1-40, 2011.
- 1195 [44] M. Humbert and T. O. Wagner, "Rare respiratory diseases are ready for primetime:
1196 from rare disease day to the European Reference Networks," *Eur. Respir. J.*, vol.
1197 49, no. 2, 2017.
- 1198 [45] C. Ray Fitzpatrick, S. Marshall MPH, K. Haywood MCSP, and R. Fitzpatrick, "Impact
1199 of patient-reported outcome measures on routine practice: a structured review," *J.*
1200 *Eval. Clin. Pract.*, vol. 12, no. 5, pp. 559-568, 2005.
- 1201 [46] I. Glinos and M. Wismar, "Hospitals and borders: seven case studies on cross-
1202 border collaboration and health system interactions," in *Observatory study series*
1203 *no. 31, European Observatory on Health Systems and Policies*, 2013.
- 1204 [47] C. Knai *et al.*, "Systematic review of the methodological quality of clinical guideline
1205 development for the management of chronic disease in Europe," *Health Policy*
1206 *(New. York)*, vol. 107, no. 2-3, pp. 157-167, 2012.
- 1207 [48] S. Brusamento *et al.*, "Assessing the effectiveness of strategies to implement
1208 clinical guidelines for the management of chronic diseases at primary care level in
1209 EU Member States: A systematic review," *Health Policy*, vol. 107, no. 2-3, pp.
1210 168-183, 2012.
- 1211
- 1212