The Royal College of Pathologists

Pathology: the science behind the cure

NICE Single Technology Appraisal: Rituximab for the treatment of recurrent or refractory stage III or IV follicular non-Hodgkin's lymphoma (Review of TA No. 37)

Appraisal Consultation Document

i) Do you consider that all the relevant evidence has been taken into account?

Answer: No. The assumption has been made that the benefit of rituximab would end at 1500 days. This would have been the case if the survival curves had come together at the end of this time, which they do not. Clinical experience is that the benefits of rituximab extend beyond this time and evidence from other trials of rituximab in lymphoma demonstrate that this is so.

ii) Do you consider that the summaries of clinical and cost effectiveness are reasonable interpretations of the evidence, and that the preliminary views on the resource impact and implications for the NHS are appropriate?

Answer: No. The use of 1500 days as an end point for benefit inflates the cost of rituximab so that it falls outside the range normally regarded as acceptable. A longer supposed benefit would bring the cost down. At present maintenance rituximab is recommended, but inclusion of rituximab as part of the reinduction regimen is nor as it appears too costly. This would likely be changed by considering a more extended benefit.

iii) Do you consider that the provisional recommendations of the Appraisal Committee are sound and constitute a suitable basis for the preparation of guidance for the NHS?

Answer: No, for the above reasons. Also extra information has been asked for from the manufacturer. This information may well change the thrust of the review.

iv) Are there any equality related issues that need special consideration that are not covered in the ACD?

Answer: Possibly. If rituximab is not used as part of the reinduction regimen then fewer patients will be eligible for maintenance rituximab. Those denied rituximab because they failed to achieve CR might be considered to have a legitimate grievance.

[redacted]

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