



Dr Carole Longson,  
Director, Centre for Health Technology Evaluation,  
National Institute for Health and Clinical Excellence,  
MidCity Place,  
71 High Holborn,  
London WC1V 6NA.

22<sup>nd</sup> April 2008

Dear Dr Longson

**Technology Appraisal Consultation Documents on technologies for the primary and secondary prevention of osteoporotic fragility fractures in postmenopausal women**

The British Society for Rheumatology (BSR) welcomes the opportunity to comment on the Appraisal Consultation Document (ACD) for the above appraisal. This letter has been prepared with the help of Dr Jon Tobias, Consultant and Reader in Rheumatology.

We wish to endorse the comments which have been forwarded by the National Osteoporosis Society (NOS). In particular we would like to add our support to the recommendation for the use of the WHO Fracture Risk Assessment Tool (FRAX). Given that the FRAX is evidence-based, and is designed for use across the spectrum including patients with and without fractures, we would have liked to see it form the basis of the present guidance. We were also disappointed at the inclusion of the stepped-intervention approach, by which patients considered suitable for alendronate may not be offered a readily available alternative if they develop side effects.

The NICE guidance process has been an extremely positive influence on clinical developments in rheumatology, such as the use of anti-TNF-drugs. In contrast, the present guidance is seemingly out of touch with clinical reality, and there is a real fear that as it stands, it will be side-lined by other more practical approaches, and have little impact on the management of osteoporosis in the UK.

Yours sincerely,

██████████

Chief Executive



Bride House, 18-20 Bride Lane, London EC4Y 8EE, UK  
Telephone: +44 (0)20 7842 0900 Fax: +44 (0)20 7842 0901  
email: [bsr@rheumatology.org.uk](mailto:bsr@rheumatology.org.uk) <http://www.rheumatology.org.uk>  
VAT No. 400 5617 66 Company Reg. No. 3470316 Charity Reg. 1067124