

**NICE Health Technology Appraisal: tocilizumab for the treatment of rheumatoid arthritis (rapid review of technology appraisal guidance 198  
Pfizer response to the tocilizumab ACD**

Date: 28.10.11

Pfizer welcomes the opportunity to comment on the ACD and the evaluation report for tocilizumab for the treatment of rheumatoid arthritis (rapid review of technology appraisal guidance 198). Whilst we understand the rationale for the recommendation, we are surprised that the decision was made on an unadjusted measure of efficacy as noted in point 4.8 of the ACD, page 34.

Instead, we believe that it would have been more appropriate to use an adjusted indirect comparison method. One such method is the Bucher method<sup>1</sup>. Another approach would have been to amend the original manufacturer's MTC whereby all biologic therapies are split out and compared against each other. From other MTCs already performed in this therapeutic area, there appears to be some differences in efficacy between the therapies.

As a result, we feel that the use of the unadjusted measure of efficacy has led to a lot of uncertainty in the clinical effectiveness and the cost effectiveness estimates used to make this decision.

1 Bucher HC, Guyatt GH, Griffith LE, Walter SD. The results of direct and indirect treatment comparisons in meta-analysis of randomized controlled trials. *J Clin Epidemiol* 1997; **50**: 683–691.