Association of British Neurologists

Jeremy Powell – Technology Appraisal Project Manager
Sent via email to: TACommB@nice.org.uk

9 October 2013

Dear Jeremy,

RE: NICE - Multiple sclerosis (relapsing) teriflunomide - evaluation report

Thank you for the opportunity to respond to this report. Please see below for comments from the Association of British Neurologists.

1) Has all of the relevant evidence been taken into account?

We note the request for pairwise comparison and consideration of pre-2000 trial evidence. Otherwise, we believe all relevant evidence has been taken into account.

2) Are the summaries of clinical and cost effectiveness reasonable interpretations of the evidence?

Yes.

3) Are the provisional recommendations sound and a suitable basis for guidance to the NHS?

The preliminary recommendations provide a sound and suitable basis for drafting the final guidance document as far as they go, but not a sufficient one. Although all the evidence we believe has been considered, we do not believe certain aspects have been given sufficient weighting in that consideration. Specifically, insufficient account has been taken first of the very substantial beneficial impact of an oral drug; and secondly of the unpredictability of drug failure with respect to DMTs in MS - i.e., even though the potency at a population level of teriflunomide appears not significantly greater than the interferons or glatiramer, we would still anticipate there will be patients who fail on conventional DMTs but respond to teriflunomide.

Therefore on balance the ABN firmly believes that teriflunomide should be available to specialist prescribers for relapsing remitting MS.

4) Are there any aspects of the recommendations that need particular consideration to ensure we avoid unlawful discrimination against any group of people on the grounds of race, gender, disability, religion or
belief, sexual orientation, age, gender reassignment, pregnancy and maternity?

No.

Yours sincerely,

[redacted] [redacted]

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