

**NATIONAL INSTITUTE FOR HEALTH AND CARE EXCELLENCE and NHS ENGLAND**

**Proposals for changes to the arrangements for evaluating and funding drugs and other health technologies appraised through  
NICE's Technology Appraisal and Highly Specialised Technologies programmes**

*Comments proforma*

<b>Name:</b>	Dr Pamela McHenry	
<b>Role:</b>	Consultant Dermatologist, Chair of Therapy & Guidelines	
<b>Organisation:</b>	British Association of Dermatology	
<i>Have you or your organisation received any payments, grants or other funding from the pharmaceutical industry in the last three years?</i>		
<b>E-Mail address:</b>	<a href="mailto:clinicalstandards@bad.org.uk">clinicalstandards@bad.org.uk</a>	
<b>Consultation Question</b>	<b>Response to consultation questions</b>	
	<b>Please do not paste other tables into this table, as your comments could get lost – type directly into this table.</b>	
1. Do you agree that NHS England should set a budget impact threshold to signal the need to develop special arrangements for the sustainable introduction of cost effective new technologies?	Yes/No/Partially  (delete as appropriate)	
2. Do you agree that £20 million is an appropriate level? If not, what level do you think the threshold should be set at and why?	Yes/No/Partially  (delete as appropriate)	
3. Do you agree that NHS England should enter into a dialogue with companies to develop commercial agreements to help manage the budget impact of new technologies recommended by NICE?	Yes/No/Partially  (delete as appropriate)	
4. Do you agree that NICE should consider varying the	Yes/No/Partially	

<p>funding requirement for technologies it recommends, for a defined period, in circumstances where NHS England makes a case for doing so, on the grounds that the budget impact of the adoption of a new technology would compromise the allocation of funds across its other statutory responsibilities?</p>	<p>(delete as appropriate)</p>	
<p>5. Do you consider that the criteria for the fast track process are appropriate? If not, what other criteria do you suggest?</p>	<p>Yes/No/Partially  (delete as appropriate)</p>	
<p>6. Do you agree that NICE should 'fast track' new health technologies with a maximum incremental cost effectiveness ratio of £10,000 per QALY and whose costs are estimated to fall below the budget impact threshold?</p>	<p>Yes/No/Partially  (delete as appropriate)</p>	
<p>7. Do you agree that NHS England should commit to accelerating funding for technologies approved under the fast track process from 90 days to 30 days?</p>	<p>Yes/No/Partially  (delete as appropriate)</p>	
<p>8. Do you agree that NICE should absorb its proposed 'abbreviated' technology appraisal process into the proposed fast track process?</p>	<p>Yes/No/partially  (delete as appropriate)</p>	
<p>9. Do you agree that NICE and NHS England should use a cost per QALY below which the funding requirement is applied for Highly Specialised Technologies?</p>	<p>Yes/No/Partially  (delete as appropriate)</p>	
<p>10. Do you agree that £100,000 per QALY is the right maximum up to which the funding requirement would be applied? If not, what cost per QALY do you suggest, and why?</p>	<p>Yes/No/Partially  (delete as appropriate)</p>	
<p>11. Do you agree that if the cost per QALY level is exceeded, the technology should be considered through NHS England's specialised commissioning prioritisation</p>	<p>Yes/No/Partially  (delete as</p>	

process?	appropriate)	
12. Do you agree the proposed new arrangements mean that NICE would not need to take budget impact into account in its highly specialised technologies evaluations?	Yes/No/Partially  (delete as appropriate)	
13. Do you consider that any proposals in this consultation would result in NICE or NHS England failing to comply with their responsibilities under the relevant equalities legislation?	Yes/No/Partially  (delete as appropriate)	
<b>Section number primarily related to your comment (please enter only one)</b>  Indicate ' <u>general</u> ' if your comment relates to the whole document	<b>Other section numbers related to your comment</b>	<b>General comments</b>  Please insert each new comment in a new row.
General		BAD feels the proposals seems reasonable.

To submit your comments, please email this form to: [TAandHSTconsultation2016@nice.org.uk](mailto:TAandHSTconsultation2016@nice.org.uk)

**Closing date: Friday 13 January 2017**

**PLEASE NOTE:** NICE reserves the right to summarise and edit comments received during consultations, or not to publish them at all, where in the reasonable opinion of the Institute, the comments are voluminous, publication would be unlawful or publication would be otherwise inappropriate.