

Integrated	Impact As	sessment Report for (Clinical Con	nmissioning Po	licies
Policy Reference Number	1625			NO.	
Policy Title	Rituximab for anti-NMDAR auto-immune encephalitis (all ages) Proposal <u>for routine commission</u> (ref A3.1)				
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About this Impact Assessment: instructions for completion and explanatory notes

- Each section is divided into themes.
- Each theme sets out a number of questions.
- All questions are answered by selecting a drop down option or including free text.
- Free text boxes are provided to enable succinct relevant commentary to be added which explains the rationale for response or assumption. Please limit responses to 3 sentences of explanatory text.
- Data in this document is either drawn from one of the relevant policy documents or a source for the information is provided.
- Where assumptions are included where data is not available, this is specified.

Section A - Activity Impact

A1 Current Patient Population & Demography / Growth	
A1.1 Prevalence of the disease/condition.	The prevalence of the acute anti-NMDAR autoimmune encephalitis is not known. Current evidence suggests that the incidence of anti-NMDAR encephalitis, the commonest type of AE accounting for approximately 27% of all autoimmune encephalitis cases. The Evidence Review, based on current evidence suggests that in the UK, the incidence of paediatric anti- NMDAR encephalitis is estimated to be 0.85 per million children per year (95% confidence interval 0.64 to 1.06). The Evidence Review estimates that about 41 (range 30 – 48) cases of AE occur among children in the UK every year. As such, it is estimated that there are approximately 11 children (range 8-13) diagnosed with acute anti-NMDAR encephalitis every year among 12.2 million children living in the UK. Anti-NMDAR AE predominantly affects children – around 40% of all cases. Furthermore, some additional cases with anti-NMDAR AE emerge every year due to disease relapse occurring in 8% to 29% of patients. The Evidence Review notes that these figures may underestimate the true incidence. <i>Source: Policy Proposition section 6</i> <i>Clinical Evidence Review</i>
A1.2 Number of patients currently eligible for the treatment according to the proposed policy commissioning criteria.	It is estimated that 21 patients in 2017/18 are currently eligible for 2nd line treatment under the proposed policy commissioning. Upon implementation of the policy, it is estimated an additional 5 backlog patients would be immediately eligible in year 1. It is also estimated that there would be 3 relapsed patients per annum. <i>Source: Clinical Evidence Review, Policy Working Group</i> Anti-NMDAR autoimmune encephalitis predominantly affects children under 18 years (around 40% of all cases) and adults younger than 45

	years.		
	Clinical advice from the Policy Working Group would expect a cohort of 8 – 20 children newly diagnosed each year and a cohort of 20 – 50 for adults for anti-NMDAR AE.		
	Based on the Evidence Review, 44% of these fail to respond to first line treatment and would require 2^{nd} line treatment. This provides a cohort for children who may be eligible for rituximab of 4 – 9 for children and 9 – 23 for adults.		
	Total number for all ages who may be eligible for second line treatment under this policy is 13 - 32		
	In year 1 there is estimated to be 29 patients. This number is made up of a backlog of 5 patients who will all receive rituximab arising from the policy implementation and 3 patients that relapse.		
	This number includes an assumption of 15% of children and adults who may relapse and require additional second line treatment, following advice from the Policy Working Group.		
A1.3 Age group for which the treatment is proposed according to the policy commissioning criteria.	All ages Anti-NMDAR encephalitis predominantly affects children under 18 years and adults younger than 45 years.		
A1.4 Age distribution of the patient population eligible according to	Source: Clinical Evidence Review, Policy Proposition		
the proposed policy commissioning criteria	Anti-NMDAR encephalitis predominantly affects children under 18 years (around 40% of all cases) and adults younger than 45 years. This age distribution has been accounted for in the modelling for demographic growth.		
A1.5 How is the population currently distributed geographically?	Evenly		
s'O'	If unevenly, estimate regional distribution by %:		
	North enter %		

	Midlands & East	st enter %	
	London	enter %	
	South	enter %	
	Source: Policy I	Proposition section 6, Evidence Review	
	There is no known evidence of differences in geographical distribution England.		
A2 Future Patient Population & Demography			
A2.1 Projected changes in the disease/condition epidemiology, such as incidence or prevalence (prior to applying the new policy) in 2, 5, and 10 years?	identified.	rs other than demographic growth in patient po al Evidence Review, Policy Working Group	pulation
A2.2 Are there likely to be changes in demography of the patient population and would this impact on activity/outcomes?	No Source: Clinical	l Evidence Review, Policy Working Group	
A2.3 Expected net increase or decrease in the number of patients	YR2 +/-	0	
who will be eligible for the service, according to the proposed	YR2 +/- YR3 +/-	0 0	
who will be eligible for the service, according to the proposed service specification commissioning criteria, per year in years 2-5			
who will be eligible for the service, according to the proposed service specification commissioning criteria, per year in years 2-5	YR3 +/-	0	
A2.3 Expected net increase or decrease in the number of patients who will be eligible for the service, according to the proposed service specification commissioning criteria, per year in years 2-5 and 10?	YR3 +/- YR4 +/-	0 0	

made.	Yes
A3 Activity	
A3.1 What is the purpose of new policy?	Confirm routine commissioning position of an additional new treatmentAnti-NMDAR encephalitis is an acute disease rapidly progressing into an encephalopathy syndrome. This policy proposition considers NHS England's commissioning position for rituximab as second-line therapy for a well-defined cohort of patients with acute anti-NMDAR AE who have not or have inadequately responded to the first-line therapy by four weeks of treatment initiation OR within six symptomatic weeks.
A3.2 What is the annual activity associated with the existing pathway for the eligible population?	Of the 24 that would be eligible for 2nd line treatment under the current pathway (includes relapses), 8 are estimated to already be receiving rituximab as a treatment option (via IFR requests). <i>Source: Clinical Evidence Review, Policy Working Group</i> This is the current number of patients who could go on to second line treatment.
A3.3 What is the estimated annual activity associated with the proposed policy proposition pathway for the eligible population?	Of the 24 that would be eligible for 2nd line treatment under the policy proposition, 17 would be suitable for rituximab as a treatment option (see A6.2) with the additional 5 backlog patients receiving Rituximab in 2018/19 only.Source: Clinical Evidence Review, Policy Working Group Please specify
	Please see A6.2 for estimates of how many people will use rituximab as

	second line treatment in the proposed policy proposition pathway.
A3.4 What is the estimated annual activity associated with the next best alternative comparator pathway for the eligible population? If the only alternative is the existing pathway, please state 'not applicable' and move to A4.	Not Applicable Source: Policy Working Group
A4 Existing Patient Pathway	
A4.1 Existing pathway: Describe the relevant currently routinely commissioned:Treatment or intervention	Currently patients who fail to respond to 1 st line treatment will go onto a range of 2 nd line treatment options. Policy Working Group estimates that for children:
 Patient pathway Eligibility and/or uptake estimates. 	 Approximately 34% patients will already be using rituximab either as an IFR or by arrangement of the treating trust Approximately 33% children will be on a cyclophosphamide infusion Approximately 33% children will be on mycophenolate mofetil or azathioprine
	 Policy Working Group estimates that for adults: 34% using rituximab – either as an IFR or by arrangement of the treating trust 50% will be on cyclophosphamide 16% will be onycophenolate mofetil or azathioprine
A4.2. What are the current treatment access and stopping criteria?	Patients who have failed or not responded adequately to first line immunotherapy will go on to use second line treatment.

	Source: Policy Proposition, Policy Working Group
 A4.3 What percentage of the total eligible population is expected to: a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment c) Choose to initiate treatment d) Comply with treatment e) Complete treatment? 	If not known, please specify a) 100% b) 0% c) 100% d) 100% e) 100% Of the cohort of patients with anti-NMDAR AE 2-3% will fail to respond to any treatment. This has not been included in the modelling as the impact for the policy is less than 1 patient per year. <i>Source: Policy Working Group</i>
A5 Comparator (next best alternative treatment) Patient Pathway (NB: comparator/next best alternative does not refer to current pathway but to an a	

A5.1 Next best comparator:	No
Is there another 'next best' alternative treatment which is a relevant comparator?	If yes, Click here to enter text.
If yes, describe relevant	Source: Policy Working Group
 Treatment or intervention Patient pathway Actual or estimated eligibility and uptake 	
A5.2 What percentage of the total eligible population is estimated to:	Not applicable
 a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment 	a) enter % b) enter %

 c) Choose to initiate treatment d) Comply with treatment e) Complete treatment? 	c) enter % d) enter % e) enter % Source: required
A6 New Patient Pathway	
 A6.1 What percentage of the total eligible population is expected to: a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment c) Choose to initiate treatment d) Comply with treatment e) Complete treatment? 	If not known, please specify a) 100% b) 0% c) 100% d) 100% e) 100% Source: Policy Working Group
A6.2 Specify the nature and duration of the proposed new treatment or intervention.	Time limited Anti-NMDAR autoimmune encephalitis is an acute disease rapidly progressing into an encephalopathy syndrome. Cases are acutely managed and treated within a few weeks of disease onset, as this is predominantly an acute disease there is not an accrual of disease from previously undiagnosed cases.
	The policy sets out the starting criteria for patients for 2 nd line treatment as those patients who have failed or not responded adequately to first line immunotherapy, defined as deterioration or less than 2-point improvement in mRS by four weeks of treatment initiation (usually within 6 weeks of symptom onset).
	The policy describes the dose for rituximab Paediatric patients: 375mg/m2 (capped at 500mg) x 4 doses at weekly intervals
	Adults: 1g x 2 doses two weeks apart.

Response to the treatment must be monitored by modified Rankin Scale (mRS) score and improvement of neurological syndrome. Depletion of B cells can be monitored by CD19/20 levels in peripheral blood if clinically indicated (e.g. stopping criteria).

A top up dose of rituximab during acute treatment in a patient who has not responded to one rituximab treatment course (from 4 weeks following completion of first treatment course) may be considered (Child: 375mg/m2 x2 doses at weekly intervals; Adult: 1g) if the patient has a higher clearance of rituximab which is confirmed by demonstrating failure to achieve B cell depletion.

A subsequent treatment course of rituximab treatment, often termed "redosing" should only be considered in a patient that has relapsed who has previously responded (improved ≥ 2 mRS) to the first course of rituximab treatment; and have undergone adequate 1st line treatment at relapse.

In patients with severe life threatening inflammation, rituximab may be used in combination with another second-line immunotherapy, usually cyclophosphamide, to provide urgent (faster speed of action) and broader (targeting more components of the immune system) treatment to reduce brain inflammation.

Policy Working Group estimates that for children:

- Approximately 70% children will use rituximab under this policy
- Approximately 15% children will use cyclophosphamide infusion
- Approximately 15% children will use mycophenolate mofetil or azathioprine

Policy Working Group estimates that for adults:

- Approximately 70% adults will use rituximab under this policy.
- Approximately 15% adults will use cyclophosphamide
- Approximately 15% adults will use ycophenolate mofetil or

	azathioprine			
	Source: Policy proposition, Po	blicy Working G	Group	
A7 Treatment Setting				
A7.1 How is this treatment delivered to the patient?	Select all that apply:	×		
	Emergency/Urgent care atter	ndance 🗆		
	Acute Trust: inpatient	\boxtimes		
	Acute Trust: day patient	\boxtimes		
	Acute Trust: outpatient	\boxtimes		
	Mental Health provider: inpat	ient 🗆		
	Mental Health provider: outpa	atient 🗆		
	Community setting			
	Homecare			
	Other			
	Please specify: For children th setting. For adults this will minimal outpatient follow u	be under an in		-
A7.2 What is the current number of contracted providers for the		PAEDIATRIC	ADULT	
eligible population by region?	NORTH	5	8	

		T
		ō
	LONDON 4	7
	SOUTH 3	5
	Na	
A7.3 Does the proposition requires a change of delivery setting or capacity requirements?	No	
	Source: Policy Working Group	
	S	
A8 Coding		
A8.1 Specify the datasets used to record the new patient pathway activity.	Select all that apply:	1 1
activity.	Aggregate Contract Monitoring *	\square
*expected to be populated for all commissioned activity	Patient level contract monitoring	\boxtimes
	Patient level drugs dataset	\boxtimes
	Patient level devices dataset	
	Devices supply chain reconciliation dataset	
	Secondary Usage Service (SUS+)	\boxtimes
	Mental Health Services DataSet (MHSDS)	
	National Return**	
	Clinical Database**	
	Other**	

	**If National Return, Clinical database or other Blueteq will be used to monitor usage	selected, please specify:		
A8.2 Specify how the activity related to the new patient pathway will	ill Select all that apply:			
be identified.	OPCS v4.8	\boxtimes		
	ICD10	\boxtimes		
	Treatment function code	\boxtimes		
	Main Speciality code			
	HRG	\boxtimes		
	SNOMED			
	Clinical coding / terming methodology used by clinical profession			
A8.3 Identification Rules for Drugs: How are drug costs captured?	: Already specified in current NHS England Drugs List docu If the drug has already been specified in the current NHS Engl List please specify drug name and drug indication: The combination of Rituximab with this indication is not on the			
	MDS. If the drug has NOT already been specified in the current NHS England Drug List please give details of action required and confirm that this has been discussed with the pharmacy lead: Upon approval of the policy, the above combination will be added to the current MDS.			
A8.4 Identification Rules for Devices:	Not applicable			

How are device costs captured?	If the device is covered by an existing category of HCTED please specify the Device Category (as per the National Tariff Payment System Guidance).
	Click here to enter text.
	If the device is not excluded from Tariff nor covered within existing National or Local prices please specify details of action required and confirm that this has been discussed with the HCTED team. Click here to enter text.
A8.5 Identification Rules for Activity: How are activity costs captured?	Already correctly captured by an existing specialised service line (NCBPS code within the PSS Tool
	If activity costs are already captured please specify the specialised service code and description (e.g. NCBPS01C Chemotherapy).
	The appropriate codes are : NCPBS23M – Paediatric
	Neurosciences NCPBS080 - Neurology
	If activity costs are already captured please specify whether this service needs a separate code. Choose an item.
	If the activity is captured but the service line needs amendment please specify whether the proposed amendments have been documented and agreed with the Identification Rules team.
	Click here to enter text.
	If the activity is not captured please specify whether the proposed identification rules have been documented and agreed with the Identification Rules team. Choose an item.

A9 Monitoring

Please specify Click here to enter text. Select all that apply: Drugs or Device MDS
Select all that apply:
Drugs or Device MDS
Blueteq
Other prior approval
Please specify: Click here to enter text.
No
If yes, please specify mitigation:
Click here to enter text.
Yes
If yes, please specify contract monitoring requirement:
Acute Contract Monitoring and Drugs Minimum Data Sets
No
If yes, specify how routine performance monitoring data will be used for dashboard reporting.
Click here to enter text.
If no, will one be developed?
No
-

Are there any directly applicable NICE or equivalent quality standards which need to be monitored in association with the new policy?	If yes, specify how performance monitoring data will be used for this purpose. Click here to enter text.
Section E	3 - Service Impact
B1 Service Organisation	
B1.1 Describe how the service is currently organised? (i.e. tertiary centres, networked provision etc.)	Access is through the existing tertiary paediatric neurology service or in adults following discussion with the regional adult neurologist with expertise in neuro-inflammation Source: Policy Proposition
B1.2 Will the proposition change the way the commissioned service is organised?	No Source: Policy Working Group
B1.3 Will the proposition require a new approach to the organisation of care?	No change to delivery of care
B2 Geography & Access	
B2.1 Where do current referrals come from?	Select all that apply:
	GP 🗆
50	Secondary care
	Tertiary care

	Other 🗆
	Please specify:
	The policy is for second line treatment
B2.2 What impact will the new policy have on the sources of referral?	No impact
B2.3 Is the new policy likely to improve equity of access?	Increase Please specify:
	Access is currently through Individual Funding Requests. Policy will increase equity of access
	Source: Equalities Impact Assessment
B2.4 Is the new policy likely to improve equality of access and/or	Increase
outcomes?	Please specify:
X	Access is currently through Individual Funding Requests. The policy will improve equality of access
	Source: Equalities Impact Assessment
B3 Implementation	
B3.1 Will commissioning or provider action be required before	No action required
implementation of the proposition can occur?	Please specify:
B3.2 Time to implementation:	<u>No - go to B3.4</u>
Is a lead-in time required prior to implementation?	If yes, specify the likely time to implementation: Enter text

B3.3 Time to implementation:	Choose an item.
If lead-in time is required prior to implementation, will an interim plan for implementation be required?	If yes, outline the plan: Click here to enter text.
B3.4 Is a change in provider physical infrastructure required?	No Access will be through the existing tertiary paediatric neurology service or in adults following discussion with the regional adult neurologist with expertise in neuro-inflammation.
B3.5 Is a change in provider staffing required?	No See above Click here to enter text.
B3.6 Are there new clinical dependency and/or adjacency requirements that would need to be in place?	Yes Please specify: Rituximab should only be administered in an area where full resuscitation facilities and close monitoring are available; either in a day-case setting or in acute admissions wards depending on clinical requirements. A doctor should be present on the ward/unit while the infusion is commenced
B3.7 Are there changes in the support services that need to be in place?	<u>No</u> Please specify: Click here to enter text.
B3.8 Is there a change in provider and/or inter-provider governance required? (e.g. ODN arrangements / prime contractor)	No Please specify: Click here to enter text.
B3.9 Is there likely to be either an increase or decrease in the	No change

number of commissioned providers? If yes, specify the current and	Please compl	<i>lete table:</i> Not app	olicable		
estimated number of providers required in each region	Region	Current no. of providers	Future State expected range	Provisional or confirmed	
	North		\sim	select	
	Midlands & East			<u>select</u>	
	London			<u>select</u>	
	South	~		select	
	Total			select	
	Please specif				
	Not applicable				
B3.10 Specify how revised provision will be secured by NHS	Select all the	at apply:			
England as the responsible commissioner.	Publication a	and notification of	new policy	\boxtimes	
	Market interv	vention required			
		selection process	to secure increase or		
	Price-based selection process to maximise cost effectiveness				
	Any qualified				
	National Cor	s 🗆			
	Procurement	t			
	Other				
	Please specif	y:			

	Click here	to enter text.	
B4 Place-based Commissioning			
B4.1 Is this service currently subject to, or planned for, place-based commissioning arrangements? (e.g. future CCG lead, devolved commissioning arrangements, STPs)	No Please spe Click here	cify: to enter text.	
Section C	- Finance In	npact	
C1 Tariff/Pricing			
C1.1 How is the service contracted and/or charged?	Select all	that apply:	
Only specify for the relevant section of the patient pathway	Drugs	Not separately charged – part of local or national tariffs	
		Excluded from tariff – pass through	\boxtimes
		Excluded from tariff - other	
		Not separately charged – part of local or national tariffs	
		Excluded from tariff (excluding ZCM) – pass through	
	Devices	Excluded from tariff (excluding ZCM) – other	
		Via Zero Cost Model	
		Paid entirely by National Tariffs	
	Activity	Paid entirely by Local Tariffs	
		Partially paid by National Tariffs	\boxtimes

	Partially paid by Local Tariffs	
	Part/fully paid under a Block arrangement	
	Part/fully paid under Pass-Through arrangements	
	Part/fully paid under Other arrangements	
C1.2 Drug Costs	The list price cost of MabThera (active substance: Rituximab) of 500mg/50ml is £1047.78 (including VAT).	
Where not included in national or local tariffs, list each drug or combination, dosage, quantity, list price including VAT if applicable and any other key information e.g. Chemotherapy Regime.	See A6.2 for dosing cycles for the Paediatric and Adult pathway.	
NB discounted prices or local prices must not be included as these are subject to commercial confidentiality and must not be disclosed.		
C1.3 Device Costs	Not applicable	
Where not included in national or local tariff, list each element of the excluded device, quantity, list or expected price including VAT if applicable and any other key information.		
NB: Discounted prices or local prices must not be included as these are subject to commercial confidentiality and must not be disclosed.		
C1.4 Activity Costs covered by National Tariffs	Click here to enter text.	
List all the HRG codes, HRG descriptions, national tariffs (excluding MFF), volume and other key costs (e.g. specialist top up %)	Paediatric Pathway (Policy):	
	A patient would have:	
	 Year 1: 4 x £1,475: Paediatric Day case infusions (HRG: PR01C: Paediatric Nervous System Disorders with CC Score 2-4) inclusive 57.1% top up. 	of a
C'O'	 Year 1: 1 x £339: Paediatric Neurology: Outpatient Attendance: First Attendance 	st
	• Year 1: 1 x £189: Paediatric Neurology: Outpatient Attendance: Fo	llow

C1.5 Activity Costs covered by Local Tariff List all the HRGs (if applicable), HRG or local description, estimated average tariff, volume and any other key costs. Also indicate whether the Local Tariff(s) is/are newly proposed or established and if newly proposed how is has been derived, validated and tested.	 Up The specialised commissioning service line for this pathway is NCBPS23M Adult Pathway (Policy): A patient would have: Year 1: 1 x £188: Neurology: Outpatient Attendance: First Attendance Year 1: 2 x £116: Neurology: Outpatient Attendance: Follow Up The specialised commissioning service line for this pathway is NCBPS08O Not applicable
C1.6 Other Activity Costs not covered by National or Local Tariff Include descriptions and estimates of all key costs.	Not applicable
C1.7 Are there any prior approval mechanisms required either during implementation or permanently?	Yes Please specify: Blueteq
C2 Average Cost per Patient	
C2.1 What is the estimated cost per patient to NHS England, in years 1-5, including follow-up where required?	YR1 £4,815

	YR2	£4,968	\mathbf{A}
	YR3	£4,968	
	YR4	£4,968	
Are there any changes expected in year 6-10 which would impact	YR5	£4,968	
the model?	If yes, please spec No	ify:	
C3 Overall Cost Impact of this Policy to NHS England			
C3.1 Specify the budget impact of the proposal on NHS England in	Cost pressure		
relation to the relevant pathway.	Please specify:		
	Year 1: £50,155		
	Year 2: £29,276		
	Year 5: £29,276		
C3.2 If the budget impact on NHS England cannot be identified set out the reasons why this cannot be measured.	Not Applicable		
C3.3 If the activity is subject to a change of commissioning responsibility, from CCG to NHS England, has a methodology for the transfer of funds been identified, and calculated?	Not applicable		
C4 Overall cost impact of this policy to the NHS as a whole			

Budget impact for CCGs: <u>No impact on CCGs</u> Budget impact for providers: <u>No impact on providers</u> Please specify: Click here to enter text.
Cost Pressure Please specify: Year 1: £50,155 Year 2: £29,276 Year 5: £29,276
Not applicable
<u>No</u> Please specify: Click here to enter text.
CPAG Prioritisation reserve

C6.1 What are the material financial risks to implementing this policy?	No material financial risk have been identified to implementing this policy
C6.2 How can these risks be mitigated?	Not applicable
C6.3 What scenarios (differential assumptions) have been explicitly tested to generate best case, worst case and most likely total cost scenarios?	The number of patients modelled is based on the mid-point (21) of the expected patient cohort of 13-32. If the number of patients were at the lower end of the range, the budget impact would reduce by c£21k per year. If the number of patients were at the higher end of the range, the budget impact would increase by c£7k per year.
C6.4 What scenario has been approved and why?	The mid-point of the expected cohort has been modelled as this is the most likely number of patients each year (excluding backlog).
C7 Value for Money	
	There is no published avidence of east affectiveness
C7.1 What published evidence is available that the treatment is cost	There is no published evidence of cost-effectiveness
C7.1 What published evidence is available that the treatment is cost effective as evidenced in the evidence review?	Please specify:
	Please specify: The evidence review found no studies containing direct or indirect evidence on cost effectiveness of use of rituximab for children suffering with anti-NMDAR encephalitis were found. Studies where less than five patients received rituximab treatment and where a full text article was not

	Available pricing data suggests the treatment is lower cost compared to current/comparator treatment	
	Available clinical practice data suggests the new treatment has the potential to improve value for money	
	Other data has been identified	
	No data has been identified	
	The data supports a high level of certainty about the impact on value	
	The data does not support a high level of certainty about the impact on value	
	Please specify: Click here to enter text.	
C8 Cost Profile		
C8.1 Are there non-recurrent capital or revenue costs associated with this policy?	Choose an item. If yes, specify type and range: Click here to enter text.	
C8.2 If yes, confirm the source of funds to meet these costs.	Click here to enter text.	

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