

Integrated Impact Assessment Report for Clinical Commissioning Policies			
Policy Reference Number	1713		
Policy Title	Anakinra for periodic fevers and autoinflammatory disease Proposal <u>for routine commission</u> (ref A3.1)		
Lead Commissioner	Joan Ward	Clinical Lead	Prof Philip Hawkins
Finance Lead	Keith Moulds	Analytical Lead	Craig Charlton

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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.

This policy addresses the need to provide anakinra for patents with periodic fevers and autoinflammatory disease. These are very rarer diseases. There are four main diseases, 1.Familial Mediterranean Fever Incidence <40 new cases a year. Prevalence <400 patients in England Proportion of patients who may require anakinra: estimated at 20-40 patients, assuming 5-10% of patients will have colchicine-resistant disease, or be unable to tolerate colchicine 2.Hyperimmunoglobulin D syndrome (HIDS) / Mevalonate Kinase Deficiency (MKD) Incidence: <5 new cases a year

Prevalence <50 patients in England (<300 globally)

Proportion of patients who may require anakinra: approximately 70%

### 3.Schnitzler's syndrome

Incidence: < 5 new cases a year.

Prevalence <50 patients in England.

Proportion of patients who may require anakinra: 100% (as anakinra is recommended as the first line treatment for this disease)

# 4.Tumour necrosis factor receptor-associated periodic syndrome (TRAPS)

Incidence: <10 new cases a year

Prevalence <100 patients in England

Proportion of patients who may require anakinra: 75%

The best aggregated estimates for these conditions taken together are:

- Incidence: approx. 40-60 new cases a year
- Prevalence <600, of whom approx. 200 may require anakinra.</li>

	Source: Policy Propos	sition section 6
A1.2 Number of patients currently eligible for the treatment according to the proposed policy commissioning criteria.	Between 35 and 47 pa Source: Click here to Please specify Clinica Click here to enter tex	enter text. al estimate
A1.3 Age group for which the treatment is proposed according to the policy commissioning criteria.	All ages Please specify Click here to enter tex	kt.
A1.4 Age distribution of the patient population eligible according to the proposed policy commissioning criteria	enter number. if relevant Source: required Please specify Click here to enter text	
A1.5 How is the population currently distributed geographically?	unknown Geographic distribution denominator population	on is believed to be random and in proportion to
	North	enter %
	Midlands & East	enter %
	London	enter %
	South	enter %
	Source: Policy Proposition Please specify Click here to enter tex	

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?	Increasing We expect the incidence to increase in line with population growth, and that prevalence may increase in the longer term due to improved patient survival as a result of the use of anakinra, but that it is not possible to model this with any accuracy.  If other, Click here to enter text.  Source: Policy Proposition section 6		
A2.2 Are there likely to be changes in demography of the patient population and would this impact on activity/outcomes?	Not known Please specify Click here to e Source: Policy		ection 6/other
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	YR2 +/-	0	
	YR3 +/-	1	
and 10?	YR4 +/-	1	
	YR5 +/-	1	
	YR10 +/-	3	
	Source: Service	ce specification	proposition section 3.1
Are these numbers in line with ONS growth assumptions for the age specific population? If not please justify the growth assumptions made.	Choose an ite		

A3 Activity	
A3.1 What is the purpose of new policy?	Confirm routine commissioning position of an existing treatment Please specify Click here to enter text.
A3.2 What is the annual activity associated with the existing pathway for the eligible population?	81 patients are funded by NHS England, based on the funding arrangements in place prior to April 2016 these patients will be included within the baselines for the London and North regions  Source: required  Please specify Clinical estimates  The current population is made up of the patients who were previously able to access this drug before it was realised that there was no policy to support the commissioning of this drug.
A3.3 What is the estimated annual activity associated with the proposed policy proposition pathway for the eligible population?	47 newly identified patients per year  Source: based on exclusion of patients being treated currently and anticipated patients for year 1 of delivery  Please specify  Financial modelling
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.	enter number. Not applicable there is no comparator  Source: required  Please specify  Click here to enter text.

## A4 Existing Patient Pathway

## A4.1 **Existing pathway:** Describe the relevant currently routinely commissioned:

- Treatment or intervention
- Patient pathway
- Eligibility and/or uptake estimates.

The existing pathway for this cohort is a difficult one, there is not an effective treatment and patients are regularly seen at A&E and have inpatient admissions to deal with the symptoms. A proportion (6% of adult FMF, 18% TRAPS patients and 18% of MKD patients) will go on to develop renal disease, requiring dialysis and kidney transplants, this number increases if patients are not able to access anakinra.

Source: required

### A4.2. What are the current treatment access and stopping criteria?

Patient eligibility criteria

**FMF** Anakinra may be used in patients who have: documented evidence of ongoing attacks characterised by intense bouts of debilitating abdominal and chest pain that can last 12 to 72 hours; and documented evidence of intolerance due to side effects or of disease unresponsive to effective doses of colchicine up to 3.0 mg/day (or equivalent paediatric age/ weight adjusted dosing regimen)

**HIDS/MKD** Anakinra may be used in patients who have documented evidence of at least three HIDS flares in a six-month period when not receiving treatment, and whose disease is poorly managed by first line treatments or who have documented significant adverse effects associated with first line treatments, provided that there is documented evidence of chronic or recurrent disease activity supported by substantially elevated acute phase markers (CRP and/or SAA)

### Schnitzler's syndrome

Anakinra may be used as a first line treatment in patients with a documented diagnosis of Schnitzler syndrome.

### **TRAPS**

Anakinra may be used in patients who have severe flares, rash and tissue pain, periorbital edema and joint pain and whose disease is poorly managed by first line treatments or who have documented significant adverse effects associated with first line treatments, provided that there is documented evidence of chronic or recurrent disease activity supported by

	substantially elevated acute phase markers (CRP and/or SAA).
	Stopping criteria
	The stopping criteria for all the four diseases are:
	Inadequate clinical response to treatment
	Adverse effects, including neutropenia; these may be managed by varying the dose or occasionally temporarily discontinuing the drug
	Patients who have a moderate response should continue for six months. If, at the end of that period the disease response achieved is below the threshold of moderate response, the treatment should be stopped.  A moderate response is defined as an improvement in inflammatory disease activity equating to less than 50% greater than 20-50% improvement based on the blood markers of inflammation.  Source: Policy Document
A4.3 What percentage of the total eligible population is expected to:	If not known, please specify Click here to enter text.
a) Be clinically assessed for treatment	a) 100% the eligible population is defined as the cohort of patients for
b) Be considered to meet an exclusion criteria following	whom first line treatments are not effective
assessment	b) 0%
c) Choose to initiate treatment d) Comply with treatment	c) 100%
e) Complete treatment?	d) 100%
.,	e) Treatment is not curative so patients are unlikely to exit
	Source: required

### A5 Comparator (next best alternative treatment) Patient Pathway

(NB: comparator/next best alternative does not refer to current pathway but to an alternative option)

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: required
Treatment or intervention	
Patient pathway	
Actual or estimated eligibility and uptake	
A5.2 What percentage of the total eligible population is estimated to:	Total estimated eligible
a) Be clinically assessed for treatment	a) enter %
b) Be considered to meet an exclusion criteria following	b) enter %
assessment	
<ul><li>c) Choose to initiate treatment</li><li>d) Comply with treatment</li></ul>	c) enter %
e) Complete treatment?	d) enter %
	e)
	Source: required
AC New Better Detheren	
A6 New Patient Pathway	
A6.1 What percentage of the total eligible population is expected to:	If not known, please specify Click here to enter text.
a) Be clinically assessed for treatment	a) 100%
<ul> <li>b) Be considered to meet an exclusion criteria following assessment</li> </ul>	b) 0%
c) Choose to initiate treatment	c) 100%
d) Comply with treatment	d) 100%
e) Complete treatment?	e) 0% drug is not curative
	Source: required

A6.2 Specify the nature and duration of the proposed new treatment or intervention.	Life long For time limited treatments, Click here to enter text. Source: required	specify freq	uency and/or duration.
A7 Treatment Setting			
A7.1 How is this treatment delivered to the patient?	Select all that apply:		
	Emergency/Urgent care att	endance	
	Acute Trust: inpatient		
	Acute Trust: day patient		
	Acute Trust: outpatient		
	Mental Health provider: inpatient		
	Mental Health provider: out	patient	
	Community setting		
	Homecare		
	Other		
	Please specify: Click here to enter text.	,	
A7.2 What is the current number of contracted providers for the	NORTH	Not knowr	ı
eligible population by region?	MIDLANDS & EAST	Not knowr	1
	LONDON	Not knowr	1

	SOUTH	Not known	
A7.3 Does the proposition require a change of delivery setting or capacity requirements?	No Please specify: Click here to enter text. Source: required		
A8 Coding			
A8.1 Specify the datasets used to record the new patient pathway	Select all that apply:		
activity.	Aggregate Contract Monitoring	g *	
*expected to be populated for all commissioned activity	Patient level contract monitori	ing	
	Patient level drugs dataset		
	Patient level devices dataset		
	Devices supply chain reconcil	liation dataset	
	Secondary Usage Service (St	US+)	
	Mental Health Services DataS	Set (MHSDS)	
	National Return**		
	Clinical Database**		
	Other**		
	**If National Return, Clinical da Click here to enter text.	atabase or other s	elected, please specify:

A8.2 Specify how the activity related to the new patient pathway will be identified.	Select all that apply		
	OPCS v4.8		
	ICD10		
	Treatment function code		
	Main Speciality code		
	HRG		
	SNOMED		
	Clinical coding / terming methodology used by clinical profession		
		<u>.                                    </u>	
A8.3 Identification Rules for Drugs:	Choose an item.		
How are drug costs captured?	If the drug has already been specified in the cu List please specify drug name and drug indicat		
	Anakinra is commissioned currently for a numb	er of conditions	
	If the drug has NOT already been specified in t		
	Drug List please give details of action required been discussed with the pharmacy lead:		
40	The coding of anakinra has been discussed wir Information lead for Specialised Commissionin		
A8.4 Identification Rules for Devices:	Not applicable		
How are device costs captured?	If the device is covered by an existing category the Device Category (as per the National Tariff Guidance).		
	Click here to enter text.		
	If the device is not excluded from Tariff <b>nor</b> cov National or Local prices please specify details	<u> </u>	

	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?	Not captured by an existing specialised service line  If activity costs are already captured please specify the specialised service code and description (e.g. NCBPS01C Chemotherapy).  Click here to enter text.  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		
A9.1 Contracts Specify any new or revised data flow or data collection requirements, needed for inclusion in the NHS Standard Contract Information Schedule.	Yes - other Please specify Data will be collected by providers to inform a national audit meeting of the prescribing centres	
A9.2 Excluded Drugs and Devices (not covered by the Zero Cost Model)  For treatments which are tariff excluded drugs or devices not covered by the Zero Cost Model, specify the pharmacy or device monitoring required, for example reporting or use of prior approval	Select all that apply:  Drugs or Device MDS □  Blueteq □	

systems.	Other prior approval
	Please specify: Click here to enter text.
	• ( )
A9.3 Business intelligence	<u>No</u>
Is there potential for duplicate reporting?	If yes, please specify mitigation:
	Click here to enter text.
A9.4 Contract monitoring	Yes
Is this part of routine contract monitoring?	If yes, please specify contract monitoring requirement:
	Click here to enter text.
A9.5 Dashboard reporting	<u>No</u>
Specify whether a dashboard exists for the proposed intervention?	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
A9.6 NICE reporting	<u>No</u>
Are there any directly applicable NICE or equivalent quality	If yes, specify how performance monitoring data will be used for this
standards which need to be monitored in association with the new	purpose.
policy?	Click here to enter text.
Section B	- Service Impact
B1 Service Organisation	
B1.1 Describe how the service is currently organised? (i.e. tertiary	The service is provided by a small number of tertiary specialist

centres, networked provision etc.)	immunology and paediatric rh Source: required	eumatology providers
B1.2 Will the proposition change the way the commissioned service is organised?		roviders that are members or affiliates of the ncy, autoinflammatory and autoimmune
B1.3 Will the proposition require a new approach to the organisation of care?	No change to delivery of car Please specify: Click here to enter text.	<u>re</u>
B2 Geography & Access		
B2.1 Where do current referrals come from?	Select all that apply:	
	GP	
Ç()	Secondary care	
	Tertiary care	
	Other	
	Please specify: Click here to enter text.	
B2.2 What impact will the new policy have on the sources of referral?	No impact Please specify:	

	Click here to enter text.
B2.3 Is the new policy likely to improve equity of access?	Increase Please specify: There is currently a funded patient cohort, and unfunded patient cohort. This policy will ensure equality of access. Source: Equalities Impact Assessment
B2.4 Is the new policy likely to improve equality of access and/or outcomes?	Increase Please specify: See above, patients symptoms resolve whilst on treatment Source: Equalities Impact Assessment
B3 Implementation	
B3.1 Will commissioning or provider action be required before implementation of the proposition can occur?	Contract action  Please specify: Trusts will need to declare that they are a member or an affiliate member of RITA ERN.  Click here to enter text.
B3.2 <b>Time to implementation:</b> Is a lead-in time required prior to implementation?	No - go to B3.4  If yes, specify the likely time to implementation: Enter text
B3.3 <b>Time to implementation:</b> If lead-in time is required prior to implementation, will an interim plan for implementation be required?	Choose an item.  If yes, outline the plan: Click here to enter text.

B3.4 Is a change in provider physical infrastructure required?	No Please spec Click here to	•	.00	
B3.5 Is a change in provider staffing required?	No Please spec Click here to			
B3.6 Are there new clinical dependency and/or adjacency requirements that would need to be in place?	No Please spec Click here to			
B3.7 Are there changes in the support services that need to be in place?	No Please spec Click here to	-		
B3.8 Is there a change in provider and/or inter-provider governance required? (e.g. ODN arrangements / prime contractor)	Yes The Proutcomes Please specific Click here to	sify:	o meet annually to a	udit the activity and
B3.9 Is there likely to be either an increase or decrease in the number of commissioned providers? If yes, specify the current and estimated number of providers required in each region	Not yet known no providers are currently commissioned to provide this service  Please complete table:			
	Region	Current no. of providers	Future State expected range	Provisional or confirmed
	North			select

	Midlands & East			select	
	London			select	
	South			select	
	Total			select	
	Please specifical Click here to e				
B3.10 Specify how revised provision will be secured by NHS	Select all tha	nt apply:			
England as the responsible commissioner.	Publication a	nd notification of	new policy	$\boxtimes$	
	Market interv	rention required			
		selection process	to secure increase or		
	Price-based effectiveness		to maximise cost		
	Any qualified	Any qualified provider			
	National Cor	National Commercial Agreements e.g. drugs, devices			
	Procurement				
	Other			$\boxtimes$	
	Please specif Any qualified		ne who is a member o	f the RITA I	ERN
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 specify: Click here to enter text.				
Section C	- Finance In	mpact			
C1 Tariff/Pricing					
C1.1 How is the service contracted and/or charged?	Select all	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			
	Devices	Excluded from tariff (excluding ZCM) – pass through			
		Excluded from tariff (excluding ZCM) – other			
		Via Zero Cost Model			
		Paid entirely by National Tariffs	$\boxtimes$		
		Paid entirely by Local Tariffs			
		Partially paid by National Tariffs			
	Activity	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 <b>Drug Costs</b> Where not included in national or local tariffs, list each drug or combination, dosage, quantity, <b>list</b> price including VAT if applicable and any other key information e.g. Chemotherapy Regime.  NB discounted prices or local prices must not be included as these are subject to commercial confidentiality and must not be disclosed.	Anakinra annual cost for delivery in a hospital setting is £11,489 to provide 100mg per day to each patient this value includes VAT at the standard 20% rate, the cost of the drug is reduced by delivery in a homecare setting to £9,850 which is inclusive of delivery and administration charges. The charge can also be further reduced by delivery through an outsourced pharmacy to £9,574 which excludes a delivery charge.
C1.3 <b>Device Costs</b> Where not included in national or local tariff, list each element of the excluded device, quantity, <b>list or expected</b> 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.	NA
C1.4 Activity Costs covered by National Tariffs List all the HRG codes, HRG descriptions, national tariffs (excluding MFF), volume and other key costs (e.g. specialist top up %)	A&E attendances priced at an average of Type 1 & 2 departments at £158 per attendance (VB01Z – VB99Z)  OP attendances are priced at Rhuematology OP rates against WF01B single professional first attendance £246 and WF01A single professional follow up £111.  Inpatient attendances are costed using an average rate of adults £2,798 against HRG`s WJ07A – WJ07D, Paediatric patients are an average £800 using HRG`s PW20A – PW20C, dependent upon complication and comorbidity score  MFF is then applied at 8.075%.
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.	N/A

C1.6 Other Activity Costs not covered by National or Local Tariff	NA
Include descriptions and estimates of all key costs.	
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	YR1 £27,209
years 1-5, including follow-up where required?	YR2 £29,052
	YR3 £31,587
	YR4 £34,284
	YR5 £36,981
Are there any changes expected in year 6-10 which would impact the model?	If yes, please specify: Click here to enter text.
C3 Overall Cost Impact of this Policy to NHS England	
C3.1 Specify the budget impact of the proposal on NHS England in relation to the relevant pathway.	Cost saving Please specify: It is anticipated that the use of Anakinra will reduce the reliance on A&E attendances and regularity of Inpatient stays to care for patients

C3.2 If the budget impact on NHS England cannot be identified set out the reasons why this cannot be measured.	N/A
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?	NA
C4 Overall cost impact of this policy to the NHS as a whole	
C4.1 Specify the budget impact of the proposal on other parts of the NHS.	Budget impact for CCGs:  Cost neutral  Budget impact for providers:  Cost neutral  Please specify:  Click here to enter text.
C4.2 Taking into account responses to C3.1 and C4.1, specify the budget impact to the NHS as a whole.	Cost saving Please specify: Click here to enter text.
C4.3 Where the budget impact is unknown set out the reasons why this cannot be measured	NA
C4.4 Are there likely to be any costs or savings for non-NHS commissioners and/or public sector funders?	Yes  Please specify: Patients wil be able to lead normal lives, to go to work and school, to pay taxes and not be reliant on state financial support  Click here to enter text.

C5 Funding	
C5.1 Where a cost pressure is indicated, state known source of funds for investment, where identified, e.g. decommissioning less clinically or cost-effective services.	There will be an initial cost pressure of £377,530 to meet the drug costs of patients who would become eligible under this policy this value is already within the baselines of the London and North regions
C6 Financial Risks Associated with Implementing this Policy	
C6.1 What are the material financial risks to implementing this policy?	None
C6.2 How can these risks be mitigated?	NA
C6.3 What scenarios (differential assumptions) have been explicitly tested to generate best case, worst case and most likely total cost scenarios?	The impact of the disease over 10 years has been modelled for patients who are treated with Anakinra, and those not treated with Anakinra but following the current pathway of A&E and regular IP stays to treat the conditions.
C6.4 What scenario has been approved and why?	Click here to enter text. It is more cost effective to treat these patients with anakinra then to leave them untreated and using other NHS resources for symptom alleviation, which is less effective and more expensive.
C7 Value for Money	
C7.1 What published evidence is available that the treatment is cost effective as evidenced in the evidence review?	There is no published evidence of cost-effectiveness Please specify:

	Click here to enter text.			
C7.2 Has other data been identified through the service	Select all that apply:			
specification development relevant to the assessment of value for money?	Available pricing data suggests the treatment is equivalent cost compared to current/comparator treatment			
	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	<u>No</u>			
with this policy?	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.			

Orall for consultation