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2 **Nalmefene for Reducing Alcohol Consumption in People**  
3 **with Alcohol Dependence: An Evidence Review Group**  
4 **Perspective of a NICE Single Technology Appraisal**

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**Abstract** As part of its single technology appraisal process, the National Institute for Health and Care Excellence (NICE) invited the company (Lundbeck) marketing nalmefene (Selincro) to submit evidence of its clinical and cost effectiveness for reducing alcohol consumption in people with alcohol dependence. The School of Health and Related Research Technology Appraisal Group at the University of Sheffield was commissioned to act as the independent Evidence Review Group (ERG) and to produce a critical review of the company's submission to NICE. The clinical evidence was derived from three phase III, company-sponsored, randomised, double-blind, placebo-controlled trials in adults with a diagnosis of alcohol dependence comparing nalmefene, taken on an as-needed basis, in conjunction with psychosocial support with placebo in conjunction with psychosocial support. Psychosocial support was provided in the form of BRENDA, an intervention of lower intensity than that recommended in NICE Clinical Guideline 115 (NICE CG115). Post-hoc subgroup analyses were conducted in people who were drinking at high or very high risk levels at baseline and maintained this level of drinking during the screening phase prior to randomisation. This subgroup forms the

licensed population. There were a number of limitations and uncertainties in the clinical evidence base which warrant caution in its interpretation. In particular, the post-hoc subgroup analyses and high dropout rates in the three nalmefene studies meant that the inference of treatment effects might be confounded. The company's economic evaluation showed that use of nalmefene in conjunction with psychosocial support in the form of BRENDA dominated the use of BRENDA in conjunction with placebo, providing more quality-adjusted life-years (QALYs) at a reduced cost. However, this evaluation did not meet the final scope issued by NICE, which specified that the comparator should be psychological intervention as defined in NICE CG115. The ERG produced alternative cost per QALY values for the comparison undertaken by the company and suggested three further comparisons deemed relevant: (1) nalmefene with psychological intervention as defined in NICE CG115; (2) delayed use of nalmefene in those who did not respond to psychological intervention as recommended in NICE CG115 alone; and (3) use of naltrexone outside of its marketing authorisation. The ERG thought it probable that using nalmefene in only those people who do not respond to psychological intervention alone was likely to be more cost effective compared with its immediate use in the entire licensed population. The Appraisal Committee accepted the comparison with psychosocial support in the form of BRENDA and believed that the most plausible cost per QALY was likely to be below £5100. Therefore, the Appraisal Committee concluded that nalmefene in conjunction with psychosocial support was a cost effective use of NHS resources compared with psychosocial support alone for treating people with alcohol dependence drinking at a high risk level, without physical withdrawal symptoms and not requiring immediate assisted withdrawal from alcohol.

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## Key Points for Decision Makers

Nalmefene, used on an as-needed basis, in conjunction with psychosocial support in the form of BRENDA, resulted in clinically significant reductions in the number of heavy drinking days and total alcohol consumption in people with mild alcohol dependence when compared with placebo in conjunction with BRENDA in the company's trials. However, this level of psychosocial support is much less intensive than the psychological intervention defined in NICE Clinical Guideline 115 (NICE CG115).

The small number of UK people in the nalmefene studies means that the generalisability of these findings to England is unclear. In addition, there are no head-to-head randomised controlled trials comparing nalmefene in conjunction with psychosocial support to naltrexone in conjunction with psychosocial support.

Nalmefene in conjunction with continuous psychosocial support, in the form of BRENDA, appears to represent a cost-effective strategy for people with alcohol dependence who are drinking at a high risk level, without physical withdrawal symptoms and not requiring immediate medically assisted withdrawal from alcohol. However, the cost effectiveness of nalmefene in addition to the psychological intervention defined in NICE CG115 is unknown, as is the cost effectiveness of prescribing nalmefene only to those who did not respond to psychosocial support alone.

The Appraisal Committee recommended nalmefene within its licensed indication. However, specific recommendations about the settings for prescribing nalmefene and the optimal level of psychosocial support were outside the scope of a technology appraisal.

## 1 Introduction

The National Institute for Health and Care Excellence (NICE) is an independent organisation responsible for providing national guidance on promoting good health and preventing and treating ill health in priority areas with significant impact. Health technologies must be shown to be clinically effective and to represent a cost-effective use of National Health Service (NHS) resources in order for

NICE to recommend their use within the NHS in England. The NICE Single Technology Appraisal (STA) process usually covers new single health technologies within a single indication, soon after the UK market authorisation [1]. Within the STA process, the company provides NICE with a written submission, alongside a mathematical model that summarises the company's estimates of the clinical and cost effectiveness of the technology. This submission is reviewed by an external organisation independent of NICE (the Evidence Review Group [ERG]), which consults with clinical specialists and produces a report. After consideration of the company's submission and the ERG report, together with testimony from experts and other stakeholders, the Appraisal Committee formulates preliminary guidance, the Appraisal Consultation Document (ACD), which indicates its initial decision on whether or not to recommend the technology. Stakeholders are then invited to comment on the submitted evidence, and on the ACD, after which a further ACD may be produced or a Final Appraisal Determination (FAD) issued, which is open to appeal. An ACD is not produced when the technology is recommended within its full marketing authorisation; in this case, a FAD is produced directly.

This paper is a summary of the ERG report [2] for the STA of nalmefene for reducing alcohol consumption in people with alcohol dependence and a summary of the subsequent development of the NICE guidance for the use of this drug in England. Full details of all relevant appraisal documents, including the appraisal scope, ERG report, company and consultees submissions, FAD and comments from consultees and commentators can be found on the NICE website [3].

## 2 The Decision Problem

Harmful drinking is associated with major problems for individuals, their immediate families and friends, and for health and social agencies alike. Persistent harmful drinking is associated with a wide range of social, emotional, behavioural, psychiatric and physical problems which increase the longer the behaviour is maintained. Thus, people drinking harmfully may develop comorbid mental health disorders including depression, anxiety disorders and drug misuse and/or a range of physical comorbidities including neurological, cardiovascular and gastrointestinal disorders, particularly liver injury [4]. Harmful drinking has a negative effect on survival and can reduce life expectancy by 10–12 years.

Harmful drinkers may develop alcohol dependence, which is typically characterised by (1) a compulsion to drink and hence difficulty in controlling alcohol use despite harmful consequences; (2) tolerance to the effects of

169 alcohol; and (3) development of a physical withdrawal  
170 state if alcohol is suddenly stopped or reduced [5, 6]. Once  
171 dependence is established, it tends to run a chronic, re-  
172 lapsing and progressive course [7, 8].

173 The severity of the alcohol dependence may be defined  
174 using measures of symptoms and behaviours together with  
175 amounts of alcohol consumed. There are a number of  
176 validated instruments for determining both its presence and  
177 severity. Thus, the Alcohol Use Disorders Identification  
178 Test (AUDIT) is an initial screen for alcohol-related issues  
179 while the Severity of Alcohol Dependence Questionnaire  
180 (SADQ) measures alcohol-related symptoms, behaviours  
181 and consumption which are classified as mild, moderate or  
182 severe. The World Health Organization (WHO) categorises  
183 alcohol consumption in five health risk levels: abstinent,  
184 low, medium, high, and very high risk [9].

185 Estimates of the overall prevalence of alcohol depen-  
186 dence in England vary from 4 to 6 % [4, 10–12], resulting  
187 in an estimated 1.6 million people who are alcohol de-  
188 pendent in England [13]. Of these, only approximately 6 %  
189 per year access treatment [11, 12, 14]. The reasons for this  
190 include the often long period between developing alcohol  
191 dependence and seeking help, the lack of systematic  
192 screening and the limited availability of specialist alcohol  
193 treatment services in some parts of the country [4].

194 The NICE clinical guideline on the diagnosis, assess-  
195 ment and management of harmful drinking and alcohol  
196 dependence (NICE CG115) [4] recommends a treatment  
197 goal of either abstinence or a reduction in alcohol con-  
198 sumption, depending on its severity. For people with mild  
199 alcohol dependence, the NICE guideline states that assisted  
200 withdrawal programmes are usually not needed and recom-  
201 mends offering psychological intervention in the form  
202 of cognitive behavioural therapies, behavioural therapies,  
203 behavioural couples therapy or social network and envi-  
204 ronment-based therapies; these interventions are delivered  
205 by appropriately trained and competent staff, typically in  
206 weekly 1-h sessions over a 12-week period. Such support is  
207 focused specifically on alcohol-related cognitions, be-  
208 haviour problems and social networks and can be adapted  
209 to a goal of total abstinence or to a reduction in con-  
210 sumption. Pharmacological interventions such as acam-  
211 prosate or naltrexone may also be considered for people  
212 with mild alcohol dependence if they do not respond to  
213 psychological intervention alone, or if they specifically  
214 request it. However, these recommendations, which were  
215 based on limited direct evidence for naltrexone in this  
216 population and indirect evidence for acamprosate in a  
217 population with more severe dependence, do not allow for  
218 the fact that neither naltrexone nor acamprosate have cur-  
219 rent UK marketing authorisation for the reduction of al-  
220 alcohol intake. In addition, access to psychological

221 intervention that is focused on alcohol use is limited in  
222 England [15].

223 For people with moderate alcohol dependence, assisted  
224 withdrawal programmes are usually needed but can be  
225 managed in a community setting, whereas for people with  
226 severe alcohol dependence, medically assisted withdrawal  
227 programmes will certainly be needed, usually in an inpa-  
228 tient or residential setting. Pharmacological interventions,  
229 such as acamprosate, naltrexone or disulfiram, in combi-  
230 nation with psychological intervention may also be con-  
231 sidered for people with moderate or severe alcohol  
232 dependence who have successfully withdrawn from alcohol  
233 to help maintenance of abstinence in the longer term.

234 Nalmefene, which is an opioid system modulator similar  
235 to naltrexone, was granted a European marketing authori-  
236 sation in February 2013 and was launched in the UK in May  
237 2013. It is indicated as an option for reducing alcohol  
238 consumption for people with alcohol dependence who have  
239 a high drinking risk level (defined as alcohol consumption  
240 of more than 60 g/day [7.5 units/day] for males and more  
241 than 40 g/day [5 units/day] for females), according to the  
242 WHO drinking risk levels, without physical withdrawal  
243 symptoms and who do not require immediate detoxification.  
244 It should only be prescribed in conjunction with continuous  
245 psychosocial support focused on treatment adherence and  
246 reducing alcohol consumption and should be started only in  
247 people who continue to have a high drinking risk level  
248 2 weeks after an initial assessment such as an evaluation of  
249 the patient's clinical status, social situation, and alcohol  
250 consumption pattern (based on patient reporting) [16]. It is  
251 administered orally on an 'as-needed' basis with a recom-  
252 mended maximum dose of one 18 mg tablet per day.

253 NICE issued a final scope to appraise the clinical and cost  
254 effectiveness of nalmefene within its licensed indication. If  
255 evidence allowed, a wider perspective than the NHS and  
256 Personal and Social Services could be presented as sensitivity  
257 analyses. The intervention was 'Nalmefene in conjunction  
258 with psychosocial support (as defined in NICE Clinical  
259 Guideline 115)' with two comparators defined as 'Psycho-  
260 logical intervention such as cognitive behavioural therapies,  
261 behavioural therapies or social network and environment-  
262 based therapies alone (as defined in NICE Clinical Guideline  
263 115)' and 'Naltrexone (in conjunction with psychosocial  
264 support as defined in NICE Clinical Guideline 115)'.

### 265 3 The Independent Evidence Review Group 266 Review

267 In accordance with the process for STAs, the ERG and  
268 NICE had the opportunity to seek clarification on specific  
269 points in the company's submission, in response to which

270 the company provided additional information. The ERG  
271 also modified the company's decision analytic model to  
272 produce an ERG base case and to assess the impact of  
273 alternative parameter values and assumptions on the model  
274 results. The evidence presented in the company's submis-  
275 sion and the ERG's review of that evidence is summarised  
276 here.

### 277 3.1 Clinical Evidence Provided by the Company

278 The clinical effectiveness evidence in the company's sub-  
279 mission was based primarily on data from three clinical  
280 (AQ2) trials—ESENSE1 ( $n = 604$ ) [17–19], ESENSE2 ( $n = 718$ )  
281 [19–21] and SENSE ( $n = 675$ ) [22–24]. All three studies  
282 were company-sponsored, European, multi-country, multi-  
283 centre, randomised, double-blind, parallel-group, phase III  
284 clinical trials that compared use of 18 mg oral nalmefene,  
285 taken on an as-needed basis, with placebo in people aged  
286 18 years or over, with a Diagnostic and Statistical Manual  
287 of Mental Disorders, 4th Edition, Text Revision (DSM-IV-  
288 TR) diagnosis of alcohol dependence [5] and at least six  
289 heavy drinking days in the preceding 28 days.

290 People included in the ESENSE 1 and 2 studies had a  
291 diagnosis of alcohol dependence with more than six heavy  
292 drinking days and average alcohol consumption in the  
293 4 weeks preceding screening in excess of the WHO  
294 medium drinking risk level, defined as  $\geq 40$  g/day for men  
295 and  $\geq 20$  g/day for women. People included in the SENSE  
296 trial had more than six heavy drinking days in the 28 days  
297 prior to enrolment, an average drinking risk level of low  
298 risk or greater (84 % were drinking at least at moderate risk  
299 level), and  $< 14$  consecutive abstinent days in the 4 weeks  
300 preceding the screening visit. The total alcohol consump-  
301 tion per day in terms of grams of alcohol was 68 for  
302 placebo and 69 for nalmefene in the SENSE trial, 84 for  
303 placebo and 85 for nalmefene in ESENSE1 and 88 for  
304 placebo and 92 for nalmefene in ESENSE 2. In all three  
305 studies, people in the treatment and placebo groups re-  
306 ceived psychosocial support in the form of BRENDA, fo-  
307 cusing on treatment adherence and reduction of alcohol  
308 consumption. BRENDA has six components: (1) Biopsy-  
309 chosocial evaluation; (2) Report of the findings of the  
310 evaluation; (3) Empathy; (4) addressing the patient's  
311 Needs; (5) providing Direct advice; and (6) Assessing the  
312 patient's reaction to advice and adjusting the treatment plan  
313 as needed. All sessions were provided by trained personnel  
314 including the study investigators, nurses and psychologists  
315 and were delivered at weekly intervals for the first 2 weeks  
316 of the trial and monthly thereafter. The sessions lasted for  
317 15–30 min except for the first session, which lasted for  
318 30–40 min. The ESENSE1 and ESENSE2 trials were  
319 identically designed and executed with a follow-up period  
320 of 24 weeks. The SENSE trial ran for 52 weeks and was

designed primarily to collect safety data although the  
protocol was later amended to allow an assessment of  
efficacy.

The co-primary efficacy outcome measures for the  
ESENSE1, ESENSE2 and SENSE studies were the changes  
from baseline in the number of heavy drinking days per  
month, and total alcohol consumption in g/day at month 6.  
People self-reported their daily alcohol consumption using  
the timeline follow-back method to estimate retrospectively  
the number of standard drinks consumed each day; a  
day was defined as a 24-h period starting at 06:00 h. All  
efficacy analyses were conducted according to a modified  
intention-to-treat principle using a mixed model repeated  
measures approach (MMRM). The company noted that the  
MMRM analysis used all available data over each month  
during the treatment period and provided an unbiased es-  
timate of the treatment effect under the assumption that  
missing data were missing at random.

Between screening and randomisation, a large propor-  
tion of prospective trial participants reduced their alcohol  
intake to below a medium risk level or to less than six  
heavy drinking days per month, in the month preceding  
randomisation. These proportions were 18 % in ESENSE1,  
33 % in ESENSE2, 39 % in SENSE. As such, they no  
longer fulfilled the inclusion criteria and any further ben-  
efits in terms of a reduction in alcohol intake that might be  
gained from treatment were limited. To address this issue,  
the company, following agreement with the Scientific  
Advisory Group to the European Medicines Agency  
(EMA), performed post-hoc subgroup analyses to further  
assess the benefits of treatment with nalmefene and to  
establish the population that would benefit most from  
treatment. The company's post-hoc subgroup efficacy  
analyses included the participants from ESENSE1  
( $n = 338$ ), ESENSE2 ( $n = 303$ ) and SENSE ( $n = 183$ )  
who maintained a high or very high drinking risk level  
between screening and randomisation with alcohol con-  
sumption  $\geq 60$  g/day [ $\geq 7.5$  units/day] for men and  
 $\geq 40$  g/day [ $\geq 5$  units/day] for women. The subsequent  
marketing authorisation was granted for this subgroup of  
people only who thereby form the licensed population [25].

The main finding of the post-hoc analyses in the licensed  
population was that the reductions in heavy drinking days  
and total alcohol consumption were significantly greater in  
people treated with nalmefene in conjunction with  
BRENDA than in those receiving placebo in conjunction  
with BRENDA (Table 1).

The company also presented a post-hoc pooled analysis  
(not meta-analysis) of the individual patient level data of  
the ESENSE1, ESENSE2 and SENSE studies. This  
showed that after 6 months nalmefene in conjunction with  
BRENDA significantly reduced the number of heavy  
drinking days by  $-3.01$  days/month (95 % CI  $-4.36$  to

**Table 1** Main efficacy endpoints in the ESENSE1, ESENSE2 and SENSE trials for patients with a high/very high drinking risk level at baseline and randomisation (i.e., the licensed population)

Outcomes	Trials	Number of participants at baseline		Mean difference to placebo in the change from baseline to month 6	95 % CI	p value
		Nalmefene in conjunction with psychosocial support <sup>a</sup>	Placebo in conjunction with psychosocial support <sup>a</sup>			
Heavy drinking days	ESENSE1	171	167	-3.7 days/month	-5.9 to -1.5	0.001
	ESENSE2	148	155	-2.7 days/month	-5.0 to -0.3	0.025
	SENSE	141	42	-2.6 days/month	-5.5 to 0.2	0.071
Total alcohol consumption	ESENSE1	171	167	-18.3 g/day	-26.9 to -9.7	<0.0001
	ESENSE2	148	155	-10.3 g/day	-20.2 to -0.5	0.040
	SENSE	141	42	-15.3 g/day	-29.1 to -1.5	0.031
				-17.3 g/day <sup>b</sup>	-30.9 to -3.8 <sup>b</sup>	0.013 <sup>b</sup>

CI confidence interval

<sup>a</sup> Psychosocial support provided as a motivational and adherence enhancing intervention (BRENDA) to support change in behaviour and improve adherence to treatment. This was delivered at weekly intervals for the first 2 weeks and monthly thereafter (sessions limited to approximately 15–30 min except for the first session [administered at randomisation] which was approximately 30–40 min)

<sup>b</sup> At the start of month 13. SENSE had a longer follow-up period than ESENSE1 or ESENSE2

374 -1.66,  $p < 0.0001$ ) and total alcohol consumption by  
 375 -14.22 g/day (95 % CI -19.96 to -8.47,  $p < 0.0001$ )  
 376 compared with placebo in conjunction with BRENDA.  
 377 Following a request from the ERG and NICE, the company  
 378 undertook a meta-analysis, but these results were  
 379 marked as academic in confidence and so cannot be  
 380 presented.

381 Safety data were recorded for all three nalmefene  
 382 trials (ESENSE1, ESENSE2 and SENSE) for both the  
 383 total and licensed populations. In the pooled subgroup of  
 384 people with at least a high drinking risk level at  
 385 screening and randomisation, the percentage of treat-  
 386 ment-emergent adverse events were slightly higher than  
 387 those in the total population. Nausea, dizziness, insomnia  
 388 and headache were the most commonly reported adverse  
 389 events and they occurred more frequently in the pooled  
 390 nalmefene in conjunction with BRENDA group as  
 391 compared with the pooled placebo in conjunction with  
 392 BRENDA group. The duration of the frequent adverse  
 393 events in the nalmefene group was typically a few days  
 394 in both the total and licensed population with a median  
 395 duration of  $\leq 8$  days. In the licensed population, higher  
 396 rates of patient withdrawal were observed during the  
 397 treatment period in the pooled nalmefene in conjunction  
 398 with BRENDA group (224/475 [47.2 %]) compared with  
 399 the pooled placebo in conjunction with BRENDA group  
 400 (133/369 [36.0 %]). The main reasons for study discon-  
 401 tinuation were withdrawal of consent and adverse events.  
 402 Similar results were observed for the pooled total

population (491/1144 [42.9 %] versus 270/797 [33.9 %], 403  
 respectively). 404

In the absence of any direct head-to-head randomised 405  
 controlled trials (RCTs) comparing nalmefene in conjunction 406  
 with psychosocial support with naltrexone in conjunction 407  
 with psychosocial support, the company determined whether 408  
 a network meta-analysis could be conducted to compare the 409  
 effect of naltrexone in conjunction with psychosocial support 410  
 with nalmefene in conjunction with psychosocial support for 411  
 the reduction of alcohol consumption in actively drinking 412  
 adults with mild alcohol dependence. The company's sys- 413  
 tematic review identified three RCTs (representing four 414  
 published citations) [26–29]; however, all three studies had 415  
 limitations. For example, data were not reported on several 416  
 key variables such as total alcohol consumption; drinking 417  
 levels at baseline; drinking outcomes; and the numbers of 418  
 evaluable participants, thus making them ineligible for in- 419  
 clusion in a network meta-analysis. 420

### 3.1.1 Critique of the Clinical Evidence and Interpretation 421

1. Completeness of the data search 422  
 The ERG believes that the company undertook a 423  
 comprehensive systematic review of the current lit- 424  
 erature and that all relevant studies for nalmefene in 425  
 conjunction with psychosocial support were included. 426  
 However, it was unclear whether all the extractable 427  
 naltrexone data had been included as the company did 428  
 not provide information on whether or not they had 429

- 430 contacted the authors of the naltrexone studies to re- 483  
 431 quest additional unpublished data. 484  
 432 2. The strength of the post-hoc analysis 485  
 433 The clinical effectiveness data for nalmefene were 486  
 434 taken from three RCTs of good methodological quality 487  
 435 but the post-hoc combined subgroup analyses of 488  
 436 people who had a high or very high drinking risk 489  
 437 level may have resulted in less robust efficacy and 490  
 438 safety data because the effect of initial randomisations 491  
 439 may have been lost. In addition to the known 492  
 440 limitations of post-hoc subgroup analyses [30], Sun 493  
 441 et al. [31] suggest that the credibility of subgroup 494  
 442 effects, even when claims are strong, is usually low. 495  
 443 However, a Scientific Advisory Group, which was 496  
 444 consulted by the EMA during the regulatory process 497  
 445 for nalmefene, recognised the validity of the post-hoc 498  
 446 analysis for defining the target population and ac- 499  
 447 knowledged that whilst post-hoc analyses are not ideal, 500  
 448 they are commonly used in clinical trials for psychi- 501  
 449 atric drugs [25]. 502  
 450 3. The effect of the high drop-out rate on the robustness 503  
 451 of the findings 504  
 452 The high dropout rates in the three nalmefene studies 505  
 453 may further limit the robustness of the findings. The 506  
 454 company undertook several sensitivity analyses to 507  
 455 account for missing data but there were inconsistencies 508  
 456 in the reported differences between treated and placebo 509  
 457 groups. As a result, the EMA noted a degree of 510  
 458 uncertainty about the exact magnitude of benefit [25]. 511  
 459 In the nalmefene trials all participants self-reported 512  
 460 their alcohol intake, thus this subjective measure could 513  
 461 have biased the results. However, the company noted 514  
 462 that the timeline follow-back method, used in the 515  
 463 ESENSE 1, ESENSE 2 and SENSE trials, provides 516  
 464 reliable, albeit self-reported data on drinking be- 517  
 465 haviour [32–35]. 518  
 466 4. Uncertainty about the effectiveness of the psychosocial 519  
 467 support compared with psychological intervention as 520  
 468 defined in NICE CG115 521  
 469 The ERG noted that a key uncertainty in the clinical 522  
 470 evidence related to the type, frequency and duration of 523  
 471 the psychosocial support provided in the RCTs and 524  
 472 how generalisable this might be to practice in England. 525  
 473 In the ESENSE1, ESENSE2 and SENSE trials, 526  
 474 psychosocial support was provided in the form of 527  
 475 BRENDA. This was used in accordance with the EMA 528  
 476 guideline on the development of medicinal products 529  
 477 for the treatment of alcohol dependence [36], which 530  
 478 states that standardised psychosocial interventions 531  
 479 should be allowed in alcohol dependence studies and 532  
 480 kept to a constant and low level for all people. In the 533  
 481 nalmefene trials, BRENDA was delivered by the study 534  
 482 investigators, nurses or psychologists at weekly 535  
 intervals for the first 2 weeks and monthly thereafter;  
 sessions were limited to approximately 15–30 min  
 except for the first session which was administered at  
 randomisation and lasted approximately 30–40 min.  
 This is in contrast to the recommendation in NICE  
 CG115 [4] that psychological intervention in the form  
 of, for example, cognitive behavioural therapy or  
 behavioural couples therapy should be delivered,  
 typically by a clinical psychologist, in weekly 1-h  
 sessions over a 12-week period [4]. It is not clear how  
 the efficacy of nalmefene would have been affected if  
 trial participants had received psychological interven-  
 tion as defined in NICE CG115.
5. Duration of treatment  
 The duration of treatment in the nalmefene trials  
 ranged from 6 months (ESENSE1 and ESENSE2) to  
 1 year (SENSE trial). Adherence rates (defined as a  
 day when there was alcohol consumption and con-  
 comitant nalmefene medication intake or a day when  
 there was no alcohol consumption) ranged from  
 75.7 % in ESENSE1 to 86.7 % in the SENSE trial in  
 the licensed population. No information is available on  
 the efficacy and safety of nalmefene after 12 months'  
 treatment duration. The Summary of Product Charac-  
 teristics for nalmefene advises caution if the drug is  
 prescribed for more than 1 year [16]. Nevertheless, in  
 the company's base case it was assumed that those  
 who had reduced alcohol consumption to a medium  
 risk level at 12 months would remain on nalmefene  
 whilst at this risk level.
6. Applicability of the trial results  
 The populations in the ESENSE1, ESENSE2 and  
 SENSE trials were predominantly White (>99 %) with  
 a mean age of 48 years in the ESENSE trials and  
 44 years in the SENSE trial. Only a small minority of  
 trial participants were from the UK; no UK centres  
 participated in the ESENSE trials and in the SENSE  
 trial UK sites comprised only 5/156 (3.2 %) of the  
 total; no data were provided on inter-country vari-  
 ability in outcomes. The ESENSE1 and ESENSE2  
 trials excluded people with co-morbid psychiatric  
 conditions and SENSE excluded people with severe  
 psychiatric conditions. However, the company com-  
 mented in its submission that many alcohol-dependent  
 people have diagnosed medical conditions and/or  
 psychiatric comorbidities. In addition, people were  
 excluded if their serum transaminase levels were over  
 three times the upper laboratory reference range or if  
 they were taking certain concomitant medication such  
 as drugs for angina, anticoagulants, anticonvulsants,  
 insulin, sedatives and systemic steroids. Thus, it is  
 unclear how well the study results can be extrapolated  
 to older people, non-Caucasian populations and those

536 with the mental health and physical co-morbidities  
537 excluded from the studies. Furthermore, there must be  
538 some uncertainty regarding the generalisability of  
539 these data to people in England.

540

### 541 3.2 Cost-Effectiveness Evidence

542 The company conducted a systematic review on the cost  
543 effectiveness of nalmefene in the treatment of alcohol de-  
544 pendence. As no suitable studies were found, they devel-  
545 oped a de novo economic model, constructed in Microsoft  
546 Excel<sup>®</sup>, to estimate the cost effectiveness of as-needed  
547 nalmefene in conjunction with psychosocial support com-  
548 pared with psychosocial support alone.

549 The model was constructed using a cohort Markov ap-  
550 proach which consisted of a short-term phase (1 year based  
551 on the nalmefene clinical trials) with 1-month cycles and a  
552 long-term phase (up to 5 years using extrapolated trial re-  
553 sults) with 1-year cycles. The 1-month cycle length in the  
554 short-term phase was used to align with the follow-up in  
555 the trials, that is, heavy drinking days and total alcohol  
556 consumption over 28 days. The short-term phase aimed to  
557 take account of treatment efficacy and patient adherence  
558 and observed treatment discontinuation, incidence of al-  
559cohol-attributed harmful events and deaths. The long-term  
560 phase aimed to model the maintenance of effect of treat-  
561 ment, patient progression and the incidence of alcohol-at-  
562 tributable harmful events and deaths. A 1-year cycle length  
563 was used by the company in the long-term phase because  
564 1-year evidence for the maintenance and recurrence of  
565 heavy drinking after an initial response to treatment and  
566 second-line treatments was available. Additionally, the  
567 1-year cycle also reduced the number of assumptions and  
568 uncertainties the company considered were necessary.  
569 Half-cycle correction was not incorporated because the  
570 company considered these to be negligible because the  
571 initial cycles were a month long. The model structure was  
572 designed to reflect the treatment pathway in England, used  
573 **AQ3** a NHS and PSS perspective, and discounted both future  
574 costs and benefits at 3.5 % per annum.

575 The characteristics of the population used in the model  
576 were based on pooled data from the trial participants who  
577 met the licensing criteria in the ESENSE1, ESENSE2 and  
578 SENSE trials. Thus, the hypothetical populations com-  
579 prised adults with a mean age of 48 years at the start of the  
580 model, of whom 69 % were male. Overall, 42.5 % were in  
581 the high risk drinking level and 57.5 % in the very high  
582 risk drinking level on entry to the model with alcohol de-  
583 pendence defined according to the WHO definition of  
584 drinking risk.

585 Transition probabilities in the first year between WHO-  
586 defined drinking states were derived using pooled data

587 from the ESENSE1, ESENSE2 and SENSE trials. In ad-  
588 dition to drinking level states the model contained health  
589 states for people who experience serious alcohol-at-  
590 tributable harmful events; temporary alcohol-attributable  
591 harmful events; and for those who die. The company stated  
592 that the alcohol-attributable harmful events included in the  
593 model were 'chosen because they incur a significant cost  
594 for the healthcare system and because the association be-  
595 tween alcohol consumption and these events has the  
596 strongest published evidence. These events also occur in  
597 the assessed population of patients and within the chosen  
598 5-year time horizon. These specific events were also  
599 identified and implemented in the model based on the ad-  
600 vice received by the company from clinical and epi-  
601 demiological experts, including assessment of the available  
602 evidence in the literature'. Within the model the risks of  
603 experiencing serious and temporary events increased with  
604 the drinking risk severity.

605 Serious events were ischaemic heart disease, haemor-  
606 rhagic stroke, ischaemic stroke, cirrhosis of the liver and  
607 pancreatitis. People who experienced a serious event dis-  
608 continued treatment immediately and remained in that se-  
609 rious event health state for the remainder of the model or  
610 until death. Hence, people could only experience a single  
611 serious event. People with serious events were not allo-  
612 cated to any drinking risk level on the assumption that the  
613 costs incurred and utility loss due to the serious event  
614 would be of a greater magnitude than those associated with  
615 drinking risk level.

616 Temporary events were lower respiratory tract infec-  
617 tions, transport-related injuries and injuries not related to  
618 transport. Contrary to the assumptions made following a  
619 serious event, the drinking risk level of the patient was  
620 maintained alongside the temporary health state. People  
621 who experienced temporary events incurred an additional  
622 cost and a utility decrement but did not discontinue treat-  
623 ment. People could experience more than one temporary  
624 event within the model time horizon although not  
625 simultaneously.

626 People could die at any point in the model. The mor-  
627 tality rate was assumed to comprise three distinct elements:  
628 mortality associated with experiencing a serious event;  
629 mortality associated with experiencing a temporary event;  
630 and background mortality associated with other causes, the  
631 rates of which were set to those for an age- and gender-  
632 matched general population.

633 The model allowed people to discontinue treatment in  
634 accordance with observed rates within the RCTs. People  
635 who discontinued treatment due to nalmefene-related ad-  
636 verse events such as nausea, dizziness, insomnia or head-  
637 aches were assumed to switch to psychosocial support  
638 alone. People who discontinued treatment for non-nalme-  
639 fene-related reasons were assumed to receive no further

640 treatment and to immediately transition to either the high  
641 risk drinking level state (42.5 %) or the very high risk  
642 drinking level state (57.5 %) as at model entry. People who  
643 received no treatment were assumed to maintain their al-  
644 located drinking risk level for the remainder of the initial  
645 year. The assumed risks of serious and temporary events in  
646 the model are provided in the ERG report [2].

647 At the end of the 1-year short-term phase, people were  
648 divided into three drinking risk groups: abstinent or low  
649 risk, medium risk, or high or very high risk. Those people  
650 who were in the high- or very high-risk category at the end  
651 of the first year were assumed to need medically assisted  
652 withdrawal from alcohol followed by treatment with nal-  
653 trexone or acamprosate together with psychosocial support.  
654 This assumption was based on advice from “clinical ex-  
655 perts practising in and/or based in the NHS in England”. It  
656 was assumed that people who dropped out from nalmefene  
657 and psychosocial support or from psychosocial support  
658 alone would undergo medically assisted withdrawal from  
659 alcohol.

660 Those people who were in the abstinent or low-risk  
661 drinking group at the end of the short-term phase were  
662 assumed to need no further treatment. However, these  
663 people were at risk of relapse. People who experienced a  
664 relapse were allocated to either the high risk drinking level  
665 state (42.5 %) or the very high risk drinking level state  
666 (57.5 %) and assumed to return to the same treatment they  
667 had initially received. Within years 2–5 the costs incurred  
668 and QALYs accrued in each cycle for people who relapsed  
669 were assumed to equal the average costs, and the average  
670 QALYs for people on nalmefene and psychosocial support,  
671 or psychosocial support alone, within the initial short-term  
672 phase.

673 Those people who were drinking at a medium risk level  
674 at the end of the short-term phase were assumed to con-  
675 tinue with the same treatment. It is reported in the company  
676 submission that “According to clinical experts in England  
677 and Wales consulted by Lundbeck this is aligned with  
678 clinical practice considering the risk of acute and chronic  
679 harms for this level of drinking”. If the patient transitioned  
680 to the abstinent/low risk drinking levels then treatment  
681 would be discontinued; if the patient transitioned to high or  
682 very high risk drinking levels it was assumed that they  
683 would receive secondary treatment with naltrexone or  
684 acamprosate and psychosocial support.

685 Transition probabilities in subsequent years were based  
686 on information from several sources. Transition prob-  
687 abilities in the abstinent or low risk drinking levels were  
688 based on data from Taylor et al. [37] which estimated a  
689 relapse to heavy drinking of 19 % per annum; those in the  
690 medium risk drinking level were calculated from the  
691 SENSE RCT with the company stating that these “were  
692 derived from the average transition probabilities of the

693 medium-risk drinking level for the last 6 months of the  
694 SENSE 12-month trial”; while those in the high risk/very  
695 high risk drinking levels were based on data provided in a  
696 network meta-analysis undertaken in NICE CG115 [4],  
697 which estimated that the probability of relapse to heavy  
698 drinking at 12 months was 0.8176 (95 % Credible Interval  
699 0.3894–0.9996) for acamprosate and psychosocial support  
700 and 0.8253 (95 % Credible Interval 0.4095–0.9997) for  
701 naltrexone and psychosocial support. The company used  
702 the data for acamprosate and psychosocial support in their  
703 modelling and, on the basis of clinical opinion, used the  
704 assumption that people who relapse following treatment  
705 with either naltrexone or acamprosate and psychosocial  
706 support have a 50 % probability, each year, of receiving  
707 further treatment with naltrexone or acamprosate with  
708 psychosocial support and a 50 % probability of remaining  
709 in the high risk/very high risk drinking levels.

710 In addition to health states, the model could incorporate  
711 the effect of alcohol consumption on crime and justice,  
712 hence providing a wider societal perspective. The inclusion  
713 of a societal perspective was within scenario analyses and  
714 was not included within the company’s base case. The  
715 company submission cited Anderson and Baumberg [38],  
716 who reported that in England and Wales 25 % of all  
717 crimes; 48 % of violent crime; 19 % of robbery; and 58 %  
718 of sex offenses/rape were undertaken by people under the  
719 influence of alcohol, or were alcohol-related. To estimate  
720 the costs associated with crime the company applied  
721 methods reported by the University of Sheffield [39] for a  
722 NICE Public Health guideline (PH 24) [40].

723 The costs of nalmefene, taken on an ‘as-needed’ basis,  
724 were estimated at £620 per patient per year. It was assumed  
725 that people would be seen by their GP on 75 % of occasions  
726 at a cost of £63 per appointment and at a specialist care drug  
727 and alcohol service on the remaining 25 % of occasions at a  
728 cost of £94 per appointment. Thus, the cost for the psy-  
729 chological support component would equate to £991 per  
730 annum. A weighted average cost for medically assisted  
731 withdrawal from alcohol was assumed to be £1404.

732 The utility in the first year was taken from pooled data  
733 from the ESENSE1, ESENSE2 and SENSE RCTs. In the  
734 ESENSE trials, the EuroQol 5-dimension (EQ-5D) ques-  
735 tionnaire was administered at baseline and at weeks 12 and  
736 24 while in the SENSE trial the same questionnaire was  
737 administered at baseline, weeks 12, 25, 36 and 52. The area  
738 under the curve was estimated every 3 months from  
739 baseline to 1 year adjusted for the baseline utility, and  
740 assuming a linear transition between the mean utilities at  
741 each time point. The assumed mean utility values for  
742 nalmefene in addition to psychosocial support were: 0.79  
743 (baseline); 0.82 (12 weeks); 0.83 (24 weeks); 0.84  
744 (36 weeks); and 0.87 (52 weeks). Corresponding values for  
745 placebo in addition to psychosocial support were 0.79

746 (baseline); 0.80 (12 weeks); 0.81 (24 weeks); 0.83  
747 (36 weeks); and 0.84 (52 weeks).

748 In years 2–5, utility was assumed to be a function of  
749 drinking status. Without serious or temporary events the  
750 assumed mean utility values were 0.79 for those with a  
751 high or very high drinking status, 0.82 for those in a  
752 medium drinking state, and 0.86 for those who were ab-  
753 stinent or in a low drinking state. Data from the naturalistic  
754 **AQ4** STREAM study which was undertaken in primary care in  
755 the UK were used in a sensitivity analysis [41]. These data  
756 showed a much larger utility difference (0.285) between  
757 those drinking at a very high risk level and those who were  
758 abstinent.

759 The company provided the incremental cost effective-  
760 ness ratio (ICER) in terms of cost per QALY gained for a  
761 base-case analysis and the results from sensitivity analyses  
762 (Table 2). In addition, a threshold analysis was presented  
763 that indicated that the efficacy difference between nalme-  
764 fene together with psychosocial support and placebo to-  
765 gether with psychosocial support would need to be reduced  
766 by 70.3 % for nalmefene and psychosocial support to have  
767 a cost per QALY of £20,000. Further analyses that varied  
768 the assumptions in relation to those drinking at a medium  
769 risk level made no difference to the results.

### 770 3.2.1 Critique of the Cost-Effectiveness Evidence 771 and Interpretation

772 The de novo model developed was appropriate for the  
773 decision problem and was generally well described within  
774 the company's report. The model structure was considered  
775 by the ERG to be based on generally reasonable data  
776 sources; to be well constructed with only minor errors; and  
777 clinically appropriate.

778 The ERG noted that in the company's base case, the net  
779 impact of the favourable and unfavourable assumptions  
780 made when estimating the cost effectiveness of nalmefene  
781 and BRENDA were likely to be unfavourable to nalme-  
782 fene. The assumptions likely to be unfavourable to  
783 nalmefene include a time horizon of 5 years; the lack of an  
784 increase in mortality rates for those with serious and tem-  
785 porary events; only one serious event was permitted;  
786 drinking risk levels were considered irrelevant after the  
787 occurrence of a serious event; and use of the lower bounds  
788 and uninflated costs for a medically assisted withdrawal  
789 from alcohol. The assumptions favourable to nalmefene  
790 included over-estimation of the rates of serious and tem-  
791 porary events; over-estimation of crime rates, although not  
792 included in the base case; the high proportion of people,  
793 according to the ERG clinical advisors, undergoing inpa-  
794 tient medically assisted withdrawal from alcohol; the

requirement for all people who continue to drink at high or 795  
very high risk levels at 12 months to undergo medically 796  
assisted withdrawal; drug wastage was not included in the 797  
base case as it was thought by the company not to be an 798  
issue; the lack of imputation for dropouts in the utility 799  
calculation in the first year and the fact that nalmefene- 800  
related adverse events were not incorporated in terms of 801  
costs throughout the modelling horizon and disutility be- 802  
yond the first year. 803

There were some areas of disagreement and contention: 804

1. Appropriateness of the psychosocial support assumed 805  
Within the model the psychosocial component was 806  
represented by BRENDA as employed in the three 807  
nalmefene trials. The ERG noted that use of BRENDA 808  
contrasts strongly with the recommendations for 809  
psychological intervention as defined in NICE 810  
CG115. Thus, the evaluation undertaken in the model 811  
does not meet that specified in the final NICE scope, 812  
which stipulates that the comparator should be psy- 813  
chological intervention as defined in NICE CG115. 814  
The company assumed that psychosocial support in the 815  
form of BRENDA would be provided by GPs on 75 % 816  
of occasions and within a specialist drugs and alcohol 817  
service for the rest of the time. However, clinical 818  
advisors to the ERG felt that the proportion of visits 819  
undertaken in specialist care would be much higher 820  
were best practice followed. 821
2. Duration of treatment 822  
The ERG clinical advisors did not agree with the 823  
company's assumption that people would remain on 824  
treatment for the full year, regardless of drinking level. 825  
They felt that GPs would not allow people to continue 826  
to drink at high and more particularly at very high risk 827  
levels for more than 6 months, and more likely 828  
3 months, before recommending intensification of 829  
treatment and additional specialist input. The ERG 830  
raised this issue with the company during the clarifi- 831  
cation process; the company maintained their position 832  
but did not provide any evidence to support the 833  
contention that all people would meet the criteria for 834  
medically assisted withdrawal at 12 months rather than 835  
at 6 or 60 months. 836
3. Missing comparisons 837  
The main limitation of the company's cost-effective- 838  
ness analysis was that no formal comparison was 839  
performed between nalmefene in conjunction with 840  
psychosocial support and psychological intervention 841  
alone, where the psychological intervention was pro- 842  
vided as defined in NICE CG115 [4]. A further key 843  
limitation was that no comparison with naltrexone 844  
used outside of its marketing authorisation in 845

**Table 2** Scenario analyses results from the economic model presented by the company

Scenario analysis	Total costs (£)		Total LYs		Total QALYs		Incremental costs (£)	Incremental LYs	Incremental QALYs	ICER
	NMF + PS	PS	NMF + PS	PS	NMF + PS	PS				
Base-case analysis	4445	4842	4.413	4.404	3.624	3.553	-397	0.009	0.071	NMF + PS dominates
Time horizon reduced to 1 year	1571	1162	0.959	0.957	0.800	0.784	408	0.002	0.017	£24,684
Societal perspective included	15,632	18,524	4.413	4.404	3.624	3.553	-2893	0.009	0.071	NMF + PS dominates
Time horizon reduced to 1 year and societal perspective included	4999	5094	0.959	0.957	0.800	0.784	-95	0.002	0.017	NMF + PS dominates
NMF intake assumed to be every day rather than as-needed	4863	4842	4.413	4.404	3.624	3.553	21	0.009	0.071	£289
No second-line treatment options allowed	2959	2521	4.406	4.394	3.569	3.483	438	0.012	0.086	£5090
Using utility values from the STREAM study	4445	4842	4.413	4.404	3.122	2.929	-397	0.009	0.192	NMF + PS dominates
An assumption that PS was associated with zero costs	4254	3678	3.624	3.553	3.624	3.553	576	0.071	0.071	£8088

Dominates means the intervention provides more QALYs at a lower cost

ICER incremental cost effectiveness ratio (in terms of cost per QALY gained), LY life-year, NMF nalmefene, PS psychosocial support, QALY quality-adjusted life-year

846 conjunction with psychosocial support was made as  
847 requested in the scope.

848

### 849 3.3 Additional Work Undertaken by the Evidence 850 Review Group

851 The ERG noted that the decision problem could not be  
852 fully evaluated using the data currently available. They  
853 considered that four relevant comparisons could be for-  
854 mulated and the ability to provide robust estimates of the  
855 cost effectiveness of nalmefene in addition to psychoso-  
856 cial support decreased as the comparisons became more  
857 relevant to the decision problem. The four comparisons  
858 were:

- 859 1. Nalmefene in conjunction with psychosocial support  
860 compared with psychosocial support alone when the  
861 support was provided using BRENDA as in the pivotal  
862 RCTs.
- 863 2. Nalmefene in conjunction with psychosocial support  
864 compared with psychological intervention alone when

the psychological intervention was provided in line 865  
with NICE CG115 recommendations. 866

3. Delayed use of nalmefene in people who did not respond 867  
to psychological intervention provided in line with NICE 868  
CG115 recommendations compared with the immediate 869  
use of nalmefene in addition to psychological intervention 870  
provided in line with NICE CG115 recommendations. 871
4. Delayed or immediate use of nalmefene in people who 872  
did not respond to psychological intervention as 873  
recommended in NICE CG115 with off-label use of 874  
naltrexone in addition to psychological intervention 875  
provided in line with NICE CG115 recommendations 876  
in those who did not respond to this type of psycho- 877  
logical intervention alone. 878

#### 3.3.1 Results of the Additional Comparisons 879

None of the analyses undertaken by the ERG markedly 880  
changed the ICER calculated by the company. The one 881  
notable difference was the likely cost effectiveness of only 882  
using nalmefene in those people who do not respond to 883

884 psychological intervention alone within a clinician-defined  
885 time frame rather than using it in all eligible people in the  
886 licensed population. Although an ICER for this comparison  
887 could not be estimated precisely by the ERG, it believed that  
888 delayed treatment reserved for those who do not respond to  
889 psychosocial support alone was more cost effective than  
890 immediate treatment for all people as not all people would  
891 require nalmefene treatment. Whilst comparison 4 was  
892 considered by the ERG, an ICER could not be estimated.

893 **AQ5** 3.3.1.1 *Comparison 1* In this comparison the cost per  
894 QALY gained does not rise above £6000 (Table 3).

895 3.3.1.2 *Comparison 2* The results of the threshold ana-  
896 lysis, assuming people drinking at a medium risk level  
897 remained on treatment and ignoring societal costs, were  
898 similar to those produced by the company, namely, if the  
899 **AQ6** efficacy of nalmefene and psychosocial support compared  
900 with psychosocial support in conjunction with placebo  
901 were reduced by 62.8 %, then the cost per QALY would  
902 become £20,000. The reduction would have to be of

71.5 % for the cost per QALY to reach £30,000 (Fig. 1). **AQ7** 903  
The ERG clinical advisors did not wish to venture an 904  
opinion on whether the actual reduction would be greater 905  
or lower than a 60–70 % threshold. 906

3.3.1.3 *Comparison 3* Very few data are available to 907  
enable the cost effectiveness of nalmefene in compar- 908  
ison 3 to be assessed. The company's model estimated 909  
that, when psychosocial support was provided with 910  
BRENDA, over 20 % of people were either abstinent 911  
or drinking at low risk levels at month 3. The ERG 912  
clinical advisors felt that the response rate was likely 913  
to be higher with the more intense psychological in- 914  
tervention recommended in NICE CG115. The ERG 915  
thought it probable that in people supported in this 916  
way, the costs of nalmefene can be saved without in- 917  
curring health losses, which could be a more cost-ef- 918  
fective strategy. 919

3.3.1.4 *Comparison 4* Very few data are available to 920  
enable the cost effectiveness of nalmefene in comparison 4 921

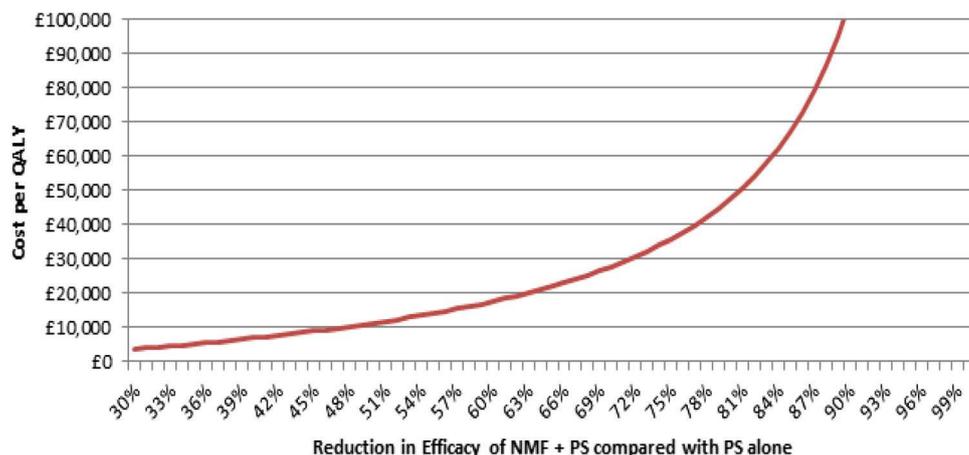
**Table 3** Exploratory analyses undertaken by the Evidence Review Group (ERG) in comparison 1

Code	Change from CS base case	Total costs (£)		Total QALYs		Incremental costs (£)	Incremental QALYs	ICER
		NMF + PS	PS alone	NMF + PS	PS alone			
CS base case		4445	4842	3.624	3.553	-397	0.071	NMF + PS dominates
1	Medium-risk drinkers assumed to relapse to high/very high risk	4803	5240	3.608	3.538	-437	0.070	NMF + PS dominates
2	Utility for NMF + PS and for PS alone set to 0.82 in the first year	4445	4842	3.613	3.558	-397	0.055	NMF + PS dominates
3	All people who withdraw for NMF-related reasons also withdraw from PS	4685	4842	3.607	3.553	-157	0.055	NMF + PS dominates
4	Half of people who withdraw for NMF-related reasons also withdraw from PS	4565	4842	3.616	3.553	-277	0.063	NMF + PS dominates
5	Assuming an average cost of medically assisted withdrawal of £645 per patient	4186	4438	3.624	3.553	-253	0.071	NMF + PS dominates
6	Costs of specialist prescribing face-to-face contact set to £119	4560	4945	3.624	3.553	-385	0.071	NMF + PS dominates
7	Costs of serious or temporary events set to £0 and associated utility set to that of very high risk drinkers	3625	3811	3.685	3.623	-186	0.062	NMF + PS dominates
ERG base case	1 + 4 + 5 + 6	4624	4849	3.601	3.538	-226	0.063	NMF + PS dominates
ERG base case but no second-line treatment options are allowed		2954	2578	3.528	3.455	377	0.073	£5166

Dominates means the intervention provides more QALYs at a lower cost

CS company submission, ICER incremental cost effectiveness ratio (in terms of cost per QALY gained), NMF nalmefene, PS psychosocial support, QALY quality-adjusted life-year

**Fig. 1** Threshold analysis of the efficacy of nalmefene and psychosocial support, provided in line with NICE CG115 guidance, compared with psychosocial support in conjunction with placebo. *NMF* nalmefene, *PS* psychosocial support, *QALY* quality-adjusted life-year



922 to be assessed. As such, the ERG did not feel comfortable  
923 in providing either an estimate of the ICER for this  
924 comparison or a view on the likely cost effectiveness of  
925 nalmefene in this comparison.

### 926 3.4 Conclusions of the Evidence Review Group 927 Report

928 The clinical evidence provided in the company's submis-  
929 sion, which was based on the results of three pivotal trials,  
930 confirmed the efficacy and safety of treatment with  
931 nalmefene together with psychosocial support. However,  
932 there were a number of limitations and uncertainties in the  
933 evidence base which warrant caution in the interpretation  
934 of the data. In particular, the inference of treatment effects  
935 may be confounded by the high drop-out rates and the use  
936 of post-hoc subgroup analyses to define the licensed  
937 population.

938 The base case results in the company's economic  
939 evaluation in which the psychosocial support in both the  
940 intervention and comparator groups was BRENDA, an  
941 intervention of lower intensity than that recommended  
942 in NICE CG115, use of nalmefene with psychosocial  
943 support dominated psychosocial support alone. The  
944 ERG's base case also estimated that the use of nalme-  
945 fene was dominant in this comparison and had a similar  
946 threshold reduction in the relative effectiveness of  
947 nalmefene and psychosocial support compared with  
948 psychosocial support at which the cost per QALY  
949 gained was £20,000. However, this evaluation did not  
950 meet the final scope issued by NICE, which specified  
951 that the comparator should be psychological intervention  
952 as defined in NICE CG115. The ERG considered three  
953 further comparisons although there were insufficient  
954 data to allow a robust evaluation. Nevertheless, the ERG  
955 believed it likely that initially providing psychosocial  
956 support alone and reserving the use of adjunct

nalmefene for those who did not benefit would be more 957  
cost effective than the immediate use of nalmefene with 958  
psychosocial support for all. 959

### 960 4 Key Methodological Issues 960

The methodological issue that had the largest impact on the 961  
results and interpretation of the economic evaluation was 962  
related to the fact that the pivotal RCTs did not use the 963  
psychosocial support listed in the scope. This means that 964  
all cost-effectiveness analyses must be subject to consid- 965  
erable uncertainty. A secondary methodological issue was 966  
that a formal evaluation against the most relevant phar- 967  
maceutical comparator, naltrexone, was not undertaken, 968  
although the ERG note that data to allow this were not 969  
identified by the company. 970

### 971 5 National Institute for Health and Care 972 Excellence Guidance

In October 2014, on the basis of the evidence available, 973  
including verbal testimony from invited clinical experts 974  
and patient representative, the Appraisal Committee pro- 975  
duced final recommendations that nalmefene was recom- 976  
mended, within its market authorisation, for reducing 977  
alcohol consumption in people with alcohol dependence 978  
who have a high drinking risk level, defined as alcohol 979  
consumption of more than 60 g per day for men and more 980  
than 40 g per day for women, according to the World 981  
Health Organization's drinking risk levels, without phys- 982  
ical withdrawal symptoms who do not require immediate 983  
medically assisted withdrawal from alcohol. It should only 984  
be prescribed in conjunction with continuous psychosocial 985  
support focused on treatment adherence and reducing al- 986  
cohol consumption and should only be initiated in people 987

988 who continue to drink at a high risk level 2 weeks after an  
989 initial assessment.

990 **5.1 Consideration of Clinical and Cost-Effectiveness**  
991 **Issues Included in the Final Appraisal**  
992 **Determination**

993 The full list of the issues considered by the Appraisal  
994 Committee can be found in the FAD [42].

995 The key issues are described in the following sections.

996 *5.1.1 Current Clinical Management*

997 The Appraisal Committee considered the current clinical  
998 management of alcohol consumption in people with alco-  
999 hol dependence who have a high drinking risk level,  
1000 without physical withdrawal problems and who do not  
1001 require immediate medically assisted withdrawal from al-  
1002cohol. Clinical specialists advised the Appraisal Committee  
1003 that psychosocial support in the form of a brief or an ex-  
1004tended brief intervention was standard first-line treatment  
1005 for these people and that the provision of psychosocial  
1006 support differed throughout England. However, the inten-  
1007 sity, duration and frequency of these interventions were  
1008 almost invariably less than those recommended in NICE  
1009 CG115 [4]. The Appraisal Committee also noted that  
1010 BRENDA, the psychosocial support provided in the  
1011 nalmefene studies, is not used in routine UK clinical  
1012 practice, although several of its components overlap with  
1013 those used in the brief or extended brief interventions  
1014 currently employed. The Committee accepted that  
1015 BRENDA closely resembled current established practice  
1016 and concluded that psychosocial support in the form of a  
1017 brief or extended brief intervention was a valid comparator  
1018 for this appraisal.

1019 *5.1.2 Uncertainties in the Clinical Evidence*

1020 The Appraisal Committee noted that the licensed popula-  
1021 tion in the marketing authorisation for nalmefene had been  
1022 identified following post-hoc subgroup analyses of trial  
1023 data. Although the subgroup analysis had not been pre-  
1024 specified, it was performed because 18 % (ESENSE1),  
1025 33 % (ESENSE2) and 39 % (SENSE) of potential trial  
1026 participants reduced their drinking between screening and  
1027 randomisation, thereby leaving little scope for additional  
1028 improvement. The ERG had concerns about the robustness  
1029 of the subgroup efficacy data as none of the nalmefene  
1030 studies were powered for this analysis and the balance  
1031 between treatments of known and unknown covariates may  
1032 have been lost. Despite this, the Appraisal Committee de-  
1033 cided that the post-hoc subgroup analyses were sufficiently  
1034 robust to be used in its decision making and were aware

that the European Medicines Agency recognised the va-  
lidity of the subgroup analyses and that these analyses  
formed the basis of the licensed population in the mar-  
keting authorisation for nalmefene. However, the Appraisal  
Committee was concerned that the differences between the  
treatment groups were relatively small (13 % in heavy  
drinking days and 11 % in total alcohol consumption),  
suggesting that most of the treatment gain from nalmefene  
could be attributed to the provision of psychosocial sup-  
port. The clinical experts present at the committee meeting  
commented that although these outcomes appear modest,  
they are clinically significant. The Appraisal Committee  
concluded that nalmefene in conjunction with BRENDA  
reduced the number of heavy drinking days and total al-  
cohol consumption compared with BRENDA in conjunc-  
tion with placebo, although the exact magnitude of the  
effect was uncertain because of the post-hoc subgroup  
analyses.

*5.1.3 Relevance of Trial Data to UK Clinical Practice*

The Appraisal Committee considered the relevance of the  
nalmefene trials to clinical practice in the UK. The  
ESENSE trials were conducted outside the UK and only  
five (3.2 %) UK sites were included in the 156-site SENSE  
trial. People with severe psychiatric conditions or severe  
medical comorbidities were excluded from the ESENSE  
trials and in the majority of centres recruiting for the  
SENSE trial. Although individuals with stable psychiatric  
comorbidities and those taking multiple medications were  
included at the UK sites, no site-specific data were pro-  
vided. The ERG and clinical specialists noted that alcohol  
dependent people often have significant alcohol-related  
psychiatric and physical comorbidities but the Appraisal  
Committee concluded that while the baseline characteris-  
tics of the populations in the three nalmefene studies were  
not wholly generalisable to clinical practice in England,  
they were sufficiently similar to aid clinicians to identify  
the appropriate patient population for treatment with  
nalmefene in conjunction with psychosocial support.

*5.1.4 Uncertainties in the Economic Modelling*

The Appraisal Committee discussed whether the compa-  
ny's assumption that people would remain on treatment for  
12 months regardless of drinking level and response was  
reasonable. The clinical specialist agreed with the ERG  
that it is unlikely that GPs would allow a patient to con-  
tinue at a high drinking risk level for up to 1 year. The  
Appraisal Committee considered whether the utility values  
used in the economic model incorporated all the health-  
related quality-of-life benefits associated with a reduction  
in alcohol consumption. The Appraisal Committee was

1084 aware that it had heard from patient experts that reducing  
1085 alcohol consumption was of considerable importance to  
1086 family members and carers. The Appraisal Committee  
1087 agreed that the utility values used in the economic model  
1088 may have underestimated the true benefit of nalmefene in  
1089 conjunction with psychosocial support. Although aware of  
1090 the uncertainty whether the results from the three clinical  
1091 nalmefene studies are generalisable to people seen in  
1092 practice in England and the uncertainty associated with the  
1093 post-hoc subgroup analyses, the Committee agreed that by  
1094 taking into account the wider societal perspective and the  
1095 possible underestimation of the utility values, the most  
1096 plausible ICER was likely to be lower than £5100 per  
1097 QALY gained.

## 1098 6 Conclusion

1099 The evidence suggests that in people with alcohol depen-  
1100 dence who are drinking at high risk levels, but who do not  
1101 have physical withdrawal symptoms and do not need im-  
1102 mediate medically assisted withdrawal from alcohol,  
1103 nalmefene in conjunction with psychosocial support is a  
1104 clinically and cost effective option for reducing alcohol  
1105 consumption when compared with the provision of psy-  
1106 chosocial support alone. However, an important point  
1107 highlighted by this STA is that the Appraisal Committee  
1108 accepted BRENDA as an appropriate addition to nalme-  
1109 fene and as a comparator despite this being different from  
1110 the psychosocial intervention explicitly listed in the scope,  
1111 which was that defined in NICE CG115. In the FAD it is  
1112 stated that “the psychosocial intervention in the guideline  
1113 is of greater intensity than would be provided by brief or  
1114 extended brief interventions” and that “the current services  
1115 available in England have difficulty providing the level of  
1116 psychosocial interventions recommended in NICE clinical  
1117 guideline 115”. It is stated that “although BRENDA is not  
1118 used in its entirety in clinical practice, most of the com-  
1119 ponents within it are currently provided in the form of brief  
1120 or extended brief interventions and could be administered  
1121 by healthcare professionals” and “concluded that the  
1122 clinical effectiveness evidence based on the comparison  
1123 with BRENDA was relevant to clinical practice in  
1124 England”.

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Abdullah Pandor, John Stevens, Andrew Rawdin and Peter Rice de-  
clare no financial conflict of interest.

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Rawdin critiqued the mathematical model provided and the cost-ef-  
fectiveness analyses submitted by the manufacturer. Abdullah Pandor  
critiqued the clinical effectiveness data reported by the manufacturer.  
John Stevens critiqued the statistical analyses undertaken by the  
manufacturer. Marsha Morgan, Peter Rice, and Jez Thompson pro-  
vided clinical advice to the ERG throughout the project. All authors  
were involved in drafting and commenting on the final document.  
Matt Stevenson acts as the guarantor of the manuscript.

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