

6 July 2012

PBS Post-Market
Department of Health and Ageing
MDP 900
GPO Box 9848
CANBERRA ACT 2601

Dear Sir/Madam

Review of Pharmaceutical Benefits Scheme anti-dementia drugs to treat Alzheimer's disease

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a submission to the Pharmaceutical Benefits Advisory Committee (PBAC) Review of Pharmaceutical Benefits Scheme (PBS) anti-dementia drugs to treat Alzheimer's disease (the Review).

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF and its members have a strong interest in the availability of medicines to Australian consumers through the PBS. We are well aware of the challenges of providing ongoing access to affordable medicines while at the same time ensuring the sustainability of the PBS into the future.

In principle, CHF is supportive of reviews of medicines currently on the PBS, as these will potentially be valuable in ensuring that publicly-subsidised medicines continue to be used appropriately and cost-effectively. We would be concerned, however, if the primary driver of these reviews is cost savings, rather than ongoing cost-effectiveness.

In relation to the current Review, CHF understands that the four anti-dementia medications currently available through the PBS are listed on an 'authority required' basis, with a requirement for a diagnosis by a medical specialist of probable mild to moderate Alzheimer's disease and baseline cognitive or functional test results. For PBS subsidy to continue beyond six months, an individual must demonstrate improved results on cognitive or functional assessments.

CHF notes the findings of the Drug Utilisation Sub-Committee review of cholinesterase inhibitor medicines for the treatment of Alzheimer's disease in 2010-11, which indicated that these medicines were being prescribed to a much larger population for longer periods of time than was originally agreed as cost-effective by the PBAC. CHF is not aware of any evidence indicating that doctors prescribing these medications for longer than six months are misusing the continuation rule by prescribing to individuals who are not demonstrating improved cognitive functioning.

We are aware, however, of concerns about the reliability of the cognitive and functional assessment tools used to support continued prescribing of these medications beyond six months. CHF argues that the limitations of the available tools, and the recommendation in the Alzheimer's Australia submission that continuation of these medications should be based on clinical judgment rather than cognitive assessment tools, should be taken into account in the current Review.

As part of this Review, CHF also urges the PBAC to seek the views of consumers with Alzheimer's disease, and their carers, about the impact of the medicines under review on their wellbeing and quality of life.

CHF appreciates the opportunity to provide a submission to the Review, and awaits the outcomes of the Review with interest. If you would like to discuss the issues raised in this submission in more detail, please contact CHF Senior Policy Manager, Anna Greenwood.

Yours sincerely



Carol Bennett
CHIEF EXECUTIVE OFFICER