

					NHSEngland
Integrated	I Impact As	sessment Report for (Clinical Com	nmissioning Pol	licies
Policy Reference Number	1621			XO	
Policy Title		apy levofloxacin • routine commission (ref	A3.1)		
Lead Commissioner	Kathy Black	er	Clinical Lead	d	Thomas Daniels
Finance Lead	Jacqui Low		Analytical L	ead	Jacqui Low
	I	ntegrated Impact Assess			
Section A – Activity		Section B - Ser	vice	Sec	ction C – Finance
A1 Current Patient Population & Demogra	ohy / Growth	B1 Service Organisation		C1 Tariff	
A2 Future Patient Population & Demograp	hy	B2 Geography & Access		C2 Average Cost p	er Patient
A3 Activity		B3 Implementation		C3 Overall Cost Im	pact of this Policy to NHS England
A4 Existing Patient Pathway		B4 Collaborative Commission	oning	C4 Overall cost imp whole	pact of this policy to the NHS as a
A5 Comparator (next best alternative treat Pathway	ment) Patient			C5 Funding	
A6 New Patient Pathway	× `			C6 Financial Risks Policy	Associated with Implementing this
A7 Treatment Setting				C7 Value for Money	/
A8 Coding				C8 Cost Profile	
A9 Monitoring					

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	A - Activity Impact		
A1 Current Patient Population & Demography / Growth			
A1.1 Prevalence of the disease/condition.		nal Registry reported 8,823 people with CF age gland. Of these there are 4,450 with chronic Pa	
A1.2 Number of patients currently eligible for the treatment according to the proposed policy commissioning criteria.	200 Source: UK CF Nation	nal Registry	
A1.3 Age group for which the treatment is proposed according to the policy commissioning criteria.	Adults Please specify This policy is for 18 ye	ears old and over	
A1.4 Age distribution of the patient population eligible according to the proposed policy commissioning criteria	18 and over, with an e Source: UK CF Natio	estimated m <i>edian age of 24-27</i> onal Registry	
A1.5 How is the population currently distributed geographically?	Evenly If unevenly, estimate	regional distribution by %:	
	North	enter %	
	Midlands & East	enter %	
	London	enter %	
	South	enter %	
	Source: Policy Propo	sition section 6	

	Please specify NCDR		
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 If other, incider survival Source:	nce is stable yet pro	evalence is increasing due to increased
A2.2 Are there likely to be changes in demography of the patient population and would this impact on activity/outcomes?	No Source:)	
A2.3 Expected net increase or decrease in the number of patients who will be eligible for treatment, according to the proposed policy commissioning criteria, per year in years 2-5 and 10?	YR2 +/- YR3 +/-	100 100	
	YR4 +/- YR5 +/-	100 100	
so ^r s	YR10 +/- Source: Policy	96 Proposition section	n 6/ other
A3 Activity			
A3.1 What is the purpose of new policy?			or restrict an existing treatment ne of treatment / stage of treatment

	Please specify
	The purpose of the new policy is to provide an alternate anti-bacterial therapy to prevent respiratory deterioration
A3.2 What is the annual activity associated with the existing pathway for the eligible population?	200 Source: UK CF National Registry
A3.3 What is the estimated annual activity associated with the proposed policy proposition pathway for the eligible population?	200 Source: UK CF National Registry
A3.4 What is the estimated annual activity associated with the next best alternative comparator pathway for the eligible population? If the only alternative is the existing pathway, please state 'not applicable' and move to A4.	Not applicable
A4 Existing Patient Pathway	
 A4.1 Existing pathway: Describe the relevant currently routinely commissioned: Treatment or intervention Patient pathway Eligibility and/or uptake estimates. 	Preventing chronic infection with Pseudomonas aeruginosa is a key element in increasing survival in patients with CF. Patients are treated with the following inhaled treatments which are routinely funded for: Tobramycin, Colistimethate sodium, Aztreonam lysine. Patients receive first line, a single therapy and this is usually followed by alternative therapies or combination therapies given one month on and one month off
	<i>Source:</i> NHS England Clinical Commissioning Policy: Inhaled Therapy for Adults and Children with Cystic Fibrosis Reference A01/P/b (2015).

A4.2. What are the current treatment access and stopping criteria?	Treatment covered by NHS policy and stopping criteria are failure of clinical efficacy, Lung transplantation, Development of intolerance or Death
	Source: NHS England Clinical Commissioning Policy: Inhaled Therapy for Adults and Children with Cystic Fibrosis Reference A01/P/b (2015)
A4.3 What percentage of the total eligible population is expected to:	If not known, please specify
 a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment 	a) 100% b) 0
c) Choose to initiate treatment	c) 100%
d) Comply with treatmente) Complete treatment?	d) 100% e) 100%
A5 Comparator (next best alternative treatment) Patient Pathway (NB: comparator/next best alternative does not refer to current pathway but to an a	
(NB: comparator/next best alternative does not refer to current pathway but to an a A5.1 Next best comparator : Is there another 'next best' alternative treatment which is a relevant	
(NB: comparator/next best alternative does not refer to current pathway but to an a A5.1 Next best comparator:	Iternative option)
(NB: comparator/next best alternative does not refer to current pathway but to an a A5.1 Next best comparator : Is there another 'next best' alternative treatment which is a relevant comparator?	Iternative option)

a) Be clinically assessed for treatment

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a) enter %

 b) Be considered to meet an exclusion criteria following assessment c) Choose to initiate treatment d) Comply with treatment e) Complete treatment? 	b) 0 c) enter % d) enter % e) enter %
A6 New Patient Pathway	
 A6.1 What percentage of the total eligible population is expected to: a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment c) Choose to initiate treatment d) Comply with treatment e) Complete treatment? 	If not known, please specify Click here to enter text. a) 100% b) 0 c) 100% d) 100% e) 100% Source: There is published evidence that compliance with treatment is around 36%. However it is difficult to accurately model the impact of this from missing the occasional dose to not using at all. We can anticipate that compliance with treatment will rise as a result of the current NIHR study on patient activation, which NHS England are supporting through a CQUIN. We have therefore modelled usage at 100% for the purpose of this impact assessment.
A6.2 Specify the nature and duration of the proposed new treatment or intervention.	Life long For time limited treatments, specify frequency and/or duration. 6 cycles of 28 days on 28 days off Source: Policy Proposition Section 7 in line with NHS England Clinical Commissioning Policy: Inhaled Therapy for Adults and Children with Cystic Fibrosis Reference A01/P/b (2015).

A7 Treatment Setting

A7.1 How is this treatment delivered to the patient?	Select all that apply:		
	Emergency/Urgent care attenda	ance 🗆	
	Acute Trust: inpatient		
	Acute Trust: day patient		
	Acute Trust: outpatient	\boxtimes	
	Mental Health provider: inpatier	nt 🗆	
	Mental Health provider: outpatie	ent 🗆	
	Community setting		
	Homecare	\boxtimes	
	Other		
A7.2 What is the current number of contracted providers for the	NORTH 6		
eligible population by region?	MIDLANDS & EAST 6		
(\mathbf{O})	LONDON 4		
	SOUTH 7		
	0		

A7.3 Does the proposition require a change of delivery setting or capacity requirements?	No Source: Policy Proposition Section 7		
A8 Coding			
A8.1 Specify the datasets used to record the new patient pathway	Select all that apply:		
activity.	Aggregate Contract Monitoring *	\boxtimes	
*expected to be populated for all commissioned activity	Patient level contract monitoring	\boxtimes	
	Patient level drugs dataset	\boxtimes	
	Patient level devices dataset		
	Devices supply chain reconciliation dataset		
	Secondary Usage Service (SUS+)	\boxtimes	
	Mental Health Services DataSet (MHSDS)		
	National Return**		
	Clinical Database**	\boxtimes	
	Other**		
	**If National Return, Clinical database or other UK CF National Registry	selected, plea	ase 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	\boxtimes
	Main Speciality code	\boxtimes
	HRG	
	SNOMED	\boxtimes
	Clinical coding / terming methodology used by clinical profession	
	Drug will be mapped to the Adult CF Service C	code: NCBPS10z
A8.3 Identification Rules for Drugs:	Already specified in current NHS England D	Prugs List document
How are drug costs captured?	If the drug has already been specified in the cullist please specify drug name and drug indicated indicated and drug indicated	3
	Levofloxacin (inhaled), Cystic Fibrosis - Not ro	utinely commissioned
	If the drug has NOT already been specified in the Drug List please give details of action required been discussed with the pharmacy lead:	
	Discussed with NPOC pharmacy lead	
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).	
	If the device is not excluded from Tariff nor con National or Local prices please specify details confirm that this has been discussed with the H	of action required and

A8.5 Identification Rules for Activity: How are activity costs captured?	Already correctly captured by an existing specialised service line (NCBPS code within the PSS Tool
	If activity costs are already captured please specify the specialised service code and description (eg NCBPS01C Chemotherapy).
	NCBPS10z
	If activity costs are already captured please specify whether this service needs a separate code. <u>No</u>
	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.
	Not Applicable
	If the activity is not captured please specify whether the proposed identification rules have been documented and agreed with the Identification Rules team. <u>No</u>

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.	<u>None</u>		
A9.2 Excluded Drugs and Devices (not covered by the Zero	Select all that apply:		
Cost Model) For treatments which are tariff excluded drugs or devices not	Drugs or Device MDS	\boxtimes	
covered by the Zero Cost Model, specify the pharmacy or device	Blueteq	\boxtimes	
monitoring required, for example reporting or use of prior approval systems.	Other prior approval		

elease specify mitigation: elease specify contract monitoring requirement: lueteq and Drug MDS pecify how routine performance monitoring data will be used for ard reporting.
Jueteq and Drug MDS pecify how routine performance monitoring data will be used for ard reporting.
Jueteq and Drug MDS pecify how routine performance monitoring data will be used for ard reporting.
pecify how routine performance monitoring data will be used for ard reporting.
ard reporting.
ard reporting.
Il one be developed?
pecify how performance monitoring data will be used for this
e Impact
e commissioned through specialised centres

B1.2 Will the proposition change the way the commissioned service is organised?	No
B1.3 Will the proposition require a new approach to the organisation of care?	No change to delivery of care
B2 Geography & Access	
B2.1 Where do current referrals come from?	Select all that apply:
	GP 🛛
	Secondary care
	Tertiary care
	Other 🗆
B2.2 What impact will the new policy have on the sources of referral?	No impact
B2.3 Is the new policy likely to improve equity of access?	No impact
<u>(</u>)	Source: Equalities Impact Assessment
B2.4 Is the new policy likely to improve equality of access and/or	Increase
outcomes?	Please specify:
	Improve outcomes
	Source: Equalities Impact Assessment

B3 In	nplementation
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B3.1 Will commissioning or provider action be required before implementation of the proposition can occur?	Contract action Please specify: 28 days' notice of use of prior notification for Blueteq will be required
B3.2 Time to implementation:	No - go to B3.4
Is a lead-in time required prior to implementation?	If yes, specify the likely time to implementation: Enter text
B3.3 Time to implementation:	Choose an item.
If lead-in time is required prior to implementation, will an interim plan	If yes, outline the plan:
for implementation be required?	Click here to enter text.
B3.4 Is a change in provider physical infrastructure required?	No
	Please specify:
	Click here to enter text.
B3.5 Is a change in provider staffing required?	No
	Please specify:
	Click here to enter text.
B3.6 Are there new clinical dependency and/or adjacency	No
requirements that would need to be in place?	Please specify:
	Click here to enter text.
B3.7 Are there changes in the support services that need to be in	No
place?	Please specify:

	Click here to	enter text.	~	
B3.8 Is there a change in provider and/or inter-provider governance required? (e.g. ODN arrangements / prime contractor)	No Please specify: Click here to enter text.			
B3.9 Is there likely to be either an increase or decrease in the number of commissioned providers? If yes, specify the current and	<u>No change</u> Please comp	ete table:		
estimated number of providers required in each region	Region	Current no. of providers	Future State expected range	Provisional or confirmed
	North Midlands & East	6 6	6 6	<u>C</u>
	London	4	4	<u>C</u>
	South Total	7 23	7 23	<u>C</u>
	Please specif Click here to	y:	23	0
B3.10 Specify how revised provision will be secured by NHS England as the responsible commissioner.	Select all the			
	Publication and notification of new policy			
	Market intervention required			
		selection process	s to secure increase o on	or 🗌
	Price-based	selection process	s to maximise cost	

	effectiven	ess			
	Any qualif	ied provider			
	National (Commercial Agreements e.g. drugs, devices			
	Procurem	ent			
	Other				
	Please spe Click here	cify: to enter text.			
B4 Place-based Commissioning					
B4.1 Is this service currently subject to, or planned for, place-based commissioning arrangements? (e.g. future CCG lead, devolved commissioning arrangements, STPs)	ements? (e.g. future CCG lead, devolved Please specify:				
Section C - Finance Impact					
C1 Tariff/Pricing					
C1.1 How is the service contracted and/or charged?	Select all	that apply:			
Only specify for the relevant section of the patient pathway		Not separately charged – part of local or natio	nal tariffs		
	Drugs	Excluded from tariff – pass through		\boxtimes	
		Excluded from tariff - other			
		Not separately charged – part of local or natio	nal tariffs		
	Devices	Excluded from tariff (excluding ZCM) – pass the	hrough		

		Excluded from tariff (excluding ZCM) – other	
		Via Zero Cost Model	
		Paid entirely by National Tariffs	
		Paid entirely by Local Tariffs	
		Partially paid by National Tariffs	
	Activity	Partially paid by Local Tariffs	
		Part/fully paid under a Block arrangment	
		Part/fully paid under Pass-Through arrangements	
		Part/fully paid under Other arrangements	
C1.2 Drug Costs Where not included in national or local tariffs, list each drug or combination, dosage, quantity, list price including VAT if applicable and any other key information e.g. Chemotherapy Regime. NB discounted prices or local prices must not be included as these are subject to commercial confidentiality and must not be disclosed.	cycles of 28 days on 28 days off - List = £5,370/year/patient or b)Nebulised collistimethate sodium - 6 cycles of 28 days on 28 days of		75% of ו -6
C1.3 Device Costs Where not included in national or local tariff, list each element of the excluded device, quantity, list or expected price including VAT if applicable and any other key information. NB: Discounted prices or local prices must not be included as these are subject to commercial confidentiality and must not be disclosed.	Not applica	able	
C1.4 Activity Costs covered by National Tariffs	Costs are (covered by the Year of Care tariff. Patients receiving inh	

List all the HRG codes, HRG descriptions, national tariffs (excluding MFF), volume and other key costs (e.g. specialist top up %)	antibiotics for this	indication will already be in Band 3
C1.5 Will a prior approval mechanism be used to support implementation of the new policy that will require provider compliance to secure reimbursement?	<u>Yes</u> Please specify: Blueteq	
C2 Average Cost per Patient		
C2.1 What is the estimated cost per patient to NHS England, in	YR1	18,963
years 1-5, including follow-up where required?	YR2	18,963
	YR3	18,963
	YR4	18,963
	YR5	18,963
Are there any changes expected in year 6-10 which would impact the model?	If yes, please spec No	cify:
C3 Overall Cost Impact of this Policy to NHS England		
C3.1 Specify the budget impact of the proposal on NHS England in	Cost pressure	
relation to the relevant pathway.	Please specify:	
	Year 1 £654,450 Year 2 £981,675	
	Year 5 £1,963,350)

C3.2 If the budget impact on NHS England cannot be identified set out the reasons why this cannot be measured.	Not applicable
C3.3 If the activity is subject to a change of commissioning responsibility, from CCG to NHS England, has a methodology for the transfer of funds been identified, and calculated?	Not applicable
C4 Overall cost impact of this policy to the NHS as a whole	
C4.1 Specify the budget impact of the proposal on other parts of the NHS.	Budget impact for CCGs: <u>No impact on CCGs</u> : <u>No impact on providers</u> 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 pressure Please specify: Year 1 £674,085; Year 2 £981,675; Year 5 £1,963,350
C4.3 Where the budget impact is unknown set out the reasons why this cannot be measured	Not applicable
C4.4 Are there likely to be any costs or savings for non-NHS commissioners and/or public sector funders?	No Please specify: Click here to enter text.

Specialised Commissioning resource envelope
There are no significant financial risks. Robust financial modelling based on reliable registry data has been undertaken.
Not applicable
Robust financial modelling based on reliable registry data has been undertaken that allows confidence, as evidenced following launch of previous inhaled antibiotics. The patient pathway has been modelled and the proportion of patients that are expected to be treated in each clinical scenario has been estimated hence there is a small risk of error that could arise if this estimation is incorrect or clinical practise changes. The usage of this new drug may be impacted by the greater use of Ivacaftor which is expected to reduce the severity of CF in specific patient groups and could potentially reduce the need for Levofloxacin in the future. As this is hypothetical this scenario has not been included in the modelling.
The scenario approved is to include Levofloxacin as an alternative inhaled therapy.

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:			
C7.2 Has other data been identified through the service specification development relevant to the assessment of value for money?	Select all that apply:			
	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 with this policy?	No If yes, specify type and range:			

Click here to enter text.

C8.2 If yes, confirm the source of funds to meet these costs.	Not applicable
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