

Integrated Impact Assessment Report for Clinical Commissioning Policies			
Service Specification Reference Number	1868		
Service Specification Title	Stroke Thrombectomy Services for Acute Ischaemic Stroke Proposal for routine commission (ref A3.1)		
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About this Impact Assessment: instructions for completion and explanatory notes

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

Section A - Activity Impact		
A1 Current Patient Population & Demography / Growth		
A1.1 Prevalence of the disease/condition.	There are approximately 80,000 stroke admissions in England per year. Currently, around 12% of all stroke patients receive intravenous thrombolysis and the majority of patients suitable for thrombectomy will come from this group. Source: Service Specification section 6 Clinical Evidence Review	
	Similar Evidence Neview	
A1.2 Number of patients currently eligible for the treatment according to the proposed Service Specification commissioning criteria.	It is anticipated that 8,000 people per year would fulfil the criteria for consideration for thrombectomy.	
A1.3 Age group for which the treatment is proposed according to the Service Specification commissioning criteria.	All ages Click here to enter text.	
A1.4 Age distribution of the patient population eligible according to the proposed Service Specification commissioning criteria	Source: Clinical Evidence Review, Service Specification The risk of having a stroke doubles every decade after the age of 55. By the age of 75, 1 in 5 women and 1 in 6 men will have a stroke. 1 in 4 (26%) of strokes in the UK occur in people under 65 years old.	
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: Service Specification section 6, Evidence Review		on 6, Evidence Review
	There is no known evidence of differences in geographical distribution England for people suffering from stroke.		~ · · · · · · · · · · · · · · · · · · ·
A2 Future Patient Population & Demography			
A2.1 Projected changes in the disease/condition epidemiology, such as incidence or prevalence (prior to applying the new Service Specification) in 2, 5, and 10 years?			e numbers of people suffering a dropping the population is ageing.
	Aging population as the incidence of stroke increases with age. However due to improved prevention the incidence in <75 has been decreasing.		
	development of	services and specia	oning plan is proposed to allow for allists. Service Specification Working Group
A2.2 Are there likely to be changes in demography of the patient population and would this impact on activity/outcomes?	No Source: Clinical	Evidence Review, S	Service Specification Working Group
A2.3 Expected net increase or decrease in the number of patients who will be eligible for the service, according to the proposed service specification commissioning criteria, per year in years 2-5 and 10?	YR2 +/-	2,500	
	YR3 +/-	3,250	
	YR4 +/-	4,000	
	YR5 +/-	6,000	

Are these numbers in line with ONS growth assumptions for the age specific population? If not please justify the growth assumptions made.	Due to the need to set up services to meet the expected number of treatments with thrombectomy, this will range from around 1,000 in year 1; increasing to 4,000 in year 5 with a rapid increase of access following over the next 2-3 years up to the total estimated of 8,000 patients. Source: Service specification section 3.1 Yes
A3 Activity	
A3.1 What is the purpose of new Service Specification?	Confirm routine commissioning position of an additional new treatment This Service Specification extends access to a treatment to the pathway for a group of patients who have suffered acute ischaemic stroke and fulfil the criteria and are geographically placed that means they cannot access thrombectomy services within a neuroscience centre within the recommended timeframe for best outcomes.
A3.2 What is the annual activity associated with the existing pathway for the eligible population?	80,000 admissions per year for stroke with 8,000 of these being eligible for treatment. These patients currently only receive thrombolysis and rehab and nursing care. The current service configuration will need development to meet the projection of 8,000 per annum mentioned above. The estimates of activity for year 1 to 5 (see below) represent a stepped increase running alongside the service development during this period.

 Year 2: 2,500 Year 3: 3,250 Year 4: 4,000 Year 5: 6,000 By year 6 up to a total anticipated of 8,000
Source: Clinical Evidence Review, Service Specification Working Group
For 2017/18 nearly 900 thrombectomies were performed. During 2018/19 1,200 thrombectomies were performed 2019/20 estimated 2,000 thrombectomies
Source: Service Specification Working Group Please specify
There is no other treatment option for this group of patients other than rehabilitation for disability and good nursing care. Source: Service Specification Working Group
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A4 Existing Patient Pathway

A4.1 Existing pathway: Describe the relevant currently routinely commissioned:	No other pathway beyond thrombolysis
Treatment or interventionPatient pathwayEligibility and/or uptake estimates.	
A4.2. What are the current treatment access and stopping criteria?	If eligibility criteria are fulfilled then it would be on a rare occasion that a patient would not proceed to treatment.
	Source: Service Specification , Service Specification Working Group
A4.3 What percentage of the total eligible population is expected to: a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment c) Choose to initiate treatment d) Comply with treatment e) Complete treatment?	If not known, please specify a) 100% b) 0% c) 100% d) 100% e) 100% Source: Service Specification Working Group
A5 Comparator (next best alternative treatment) Patient Pathwa (NB: comparator/next best alternative does not refer to current pathway but to an	
A5.1 Next best comparator: Is there another 'next best' alternative treatment which is a relevant comparator? If yes, describe relevant Treatment or intervention Patient pathway	No If yes, Click here to enter text. Source: Service Specification Working Group

Actual or estimated eligibility and uptake	
A5.2 What percentage of the total eligible population is estimated 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?	Not applicable a) 100% b) 0% c) 100% d) 100% e) 10% Source: Service Specification working group
A6.1 What percentage of the total eligible population is expected to: a) Be clinically assessed for treatment b) Be considered to meet an exclusion criteria following assessment c) Choose to initiate treatment d) Comply with treatment e) Complete treatment?	If not known, please specify a) 100% b) 0% c) 100% d) 100% e) 100% Source: Service Specification Working Group
A6.2 Specify the nature and duration of the proposed new treatment or intervention.	 Time limited 1. CT scan confirms likely ischaemic stroke 2. CTA confirms due to large artery occlusion (40%) 3. Confirm within 4.5 hours of stroke onset If yes, start IV thrombolysis if appropriate whilst reconstruct Computed tomography angiography (CTA) images for review 4. Moderate to severe stroke (on NIHSS assessment tool)

- 5. Assess for "no clinical or CT scan exclusions to thrombectomy" (estimated pre stroke Rankin & ASPECTS on CT & vascular access issues)
- 6. If yes to all above then eligible for thrombectomy

Only around 40% of stroke admissions will have a proximal large artery occlusion (LAO) as the cause (of the stroke). Only this group can be treated by thrombectomy. In total per annum in England this number is ~29, 0000. (Derived from PEARS modelling work presented at UK Stroke Forum Nov 2016) CT Angiography is required to confirm whether LAO is present or not.

Of that group with LAO stroke, the current evidence base does not apply to a reasonable proportion (very mild strokes or people with major pre-existing disability were not included in the trials of thrombectomy) and trial evidence suggests that if there are extensive changes of brain damage already present on CT scan at the time of presentation that thrombectomy is unlikely to be beneficial.

Like IV thrombolysis the benefits of thrombectomy are very time dependent & concentrated in those who can be treated within 6 hours of stroke onset – in practice that means arriving at hospital within 4.5h in order to achieve thrombectomy by 6 hours. SSNAP data indicate that ¾ of Large Artery Occlusion (LAO) stroke patients present within 4.5h of onset.

Applying all these exclusions reduces the number eligible for thrombectomy down to just under 8,000 (or 10% of all stroke admissions).

Source: Service Specification , Service Specification Working Group

A7 Treatment Setting				
A7.1 How is this treatment delivered to the patient?	Select all that apply:			
	Emergency/Urgent care atte	endance		
	Acute Trust: inpatient		\boxtimes	
	Acute Trust: day patient			
	Acute Trust: outpatient			
	Mental Health provider: inpa	atient		
	Mental Health provider: out	patient		
	Community setting			
	Homecare			
	Other			
	Please specify:			
	Neuroscience centre.			
	There may be some areas w			
	transfer times, thrombectom	-	-	
	neuroscience centre but mu standards	St Comonn	to the	service specification
	Standards			
A7.2 What is the current number of contracted providers for the eligible population by region?		Neuroscie Centres	ence	
	NORTH	8		
	MIDLANDS & EAST	5		
	LONDON	6		

	SOUTH	5		
A7.3 Does the requires a change of delivery setting or capacity requirements?	Yes development of serv Source: Service Specification	•	•	ommissioning plan
A8 Coding				
A8.1 Specify the datasets used to record the new patient pathway	Select all that apply:		_	
activity.	Aggregate Contract Monito	ring *	\boxtimes	
*expected to be populated for all commissioned activity	Patient level contract monit	oring	\boxtimes	
	Patient level drugs dataset			
	Patient level devices datas	et		
	Devices supply chain recor	ciliation dataset		
	Secondary Usage Service	(SUS+)	\boxtimes	
	Mental Health Services Da	taSet (MHSDS)		
	National Return**			
	Clinical Database**			
	Other**			
	**If National Return, Clinical	database or oth	er selected	I, please specify:

A8.2 Specify how the activity related to the new patient pathway will be identified.	Select all that apply:		
	OPCS v4.8		
	ICD10		
	Treatment function code		
	Main Speciality code		
	HRG		
	SNOMED		
	Clinical coding / terming methodology used by clinical profession		
	As per Health and Social care Information Cen Classifications Service issued on the 26 Nover codes for Mechanical clot retrieval for treating are: 1. L71.2 Percutaneous transluminal embodincludes: Percutaneous transluminal thrombed • Y53 Approach to organ under image of Z35. Cerebral artery or O28.1 Basilar are 2. ICD-10 of I63.9 Cerebral infarction, unspecification above this will identify thrombectomy accorded above this will identify thrombectomy accorded and the codes above the codes are codes.	nber 2016, the OPCS acute ischaemic strok ectomy of artery tomy of artery: ontrol tery	S-4 <e< th=""></e<>
A8.3 Identification Rules for Drugs: How are drug costs captured?	Not applicable		

A8.4 Identification Rules for Devices: How are device costs captured?	Not excluded from Tariff and covered within existing National or Local prices If the device is covered by an existing category of HCTED please specify the Device Category (as per the National Tariff Payment System Guidance). If the device is not excluded from tariff nor covered within existing national or local prices please specify details of action required and confirm that this has been discussed with the HCTED team.
A8.5 Identification Rules for Activity: How are activity costs captured?	Already correctly captured by an existing specialised service line (NCBPS code within the PSS Tool If activity costs are already captured please specify the specialised service code and description (e.g. NCBPS01C Chemotherapy). The appropriate codes are: NCPBS08O – Neurology
A9 Monitoring	
A9.1 Contracts	Yes - other
Specify any new or revised data flow or data collection requirements, needed for inclusion in the NHS Standard Contract Information Schedule.	Please specify: Schedule 6 to be amended Click here to enter text.
A9.2 Excluded Drugs and Devices (not covered by the Zero Cost Model)	Select all that apply:

For treatments which are tariff excluded drugs or devices not	Drugs or Device MDS
covered by the Zero Cost Model, specify the pharmacy or device monitoring required, for example reporting or use of prior approval	Blueteq
systems.	Other prior approval
	Please specify: Click here to enter text.
A9.3 Business intelligence	<u>No</u>
Is there potential for duplicate reporting?	If yes, please specify mitigation: Click here to enter text.
A9.4 Contract monitoring	<u>Yes</u>
Is this part of routine contract monitoring?	Reporting of activity via SUS with activity and outcomes via SSNAP and QST portal.
A9.5 Dashboard reporting	<u>Yes</u>
Specify whether a dashboard exists for the proposed intervention?	4 monthly outcome reporting (so that it aligns with current audit reporting from SSNAP)
	Compliance with specification and implementation plan if required. Click here to enter text.
A9.6 NICE reporting	<u>No</u>
Are there any directly applicable NICE or equivalent quality standards which need to be monitored in association with the new Service Specification?	
Section B	- Service Impact

B1 Service Organisation			
B1.1 Describe how the service is currently organised? (I.e. tertiary centres, networked provision etc.)	Stroke care is organised within provider networks, this intervention will require referral to an approved and commissioned Thrombectomy centre with an SLA with a recognised networked Neuroscience centre. Source: Service Specification		
B1.2 Will the specification change the way the commissioned service is organised?	Yes Potential for Clinical Commissioning Groups (CCGs) to unbundle the stroke pathway payment when reduction in length of stay is understood. Source: Service Specification Working Group		
B1.3 Will the specification require a new approach to the organisation of care?	Some areas may need to network to achieve optimal access over a 24/7 period whilst services develop.		
B2 Geography & Access			
B2.1 Where do current referrals come from?	Select all that apply:		
	GP		
	Secondary care		
	Tertiary care ⊠		
	Other		
	Emergency departments and stroke services. Hospitals with hyper acute stroke units (HASU)		

B2.2 What impact will the new Service Specification have on the sources of referral?	Increase Patients who are admitted to a hospital Hyper Acute Stroke Unit (HASU) where it is not co located with a thrombectomy centre will require a critical transfer to a Thrombectomy centre.
B2.3 Is the new Service Specification likely to improve equity of access?	Increase Please specify: Yes by increasing the availability of the provision of the service. Source: Equalities Impact Assessment
B2.4 Is the new Service Specification likely to improve equality of access and/or outcomes?	Increase Please specify: Yes as above in B2.3 Source: Equalities Impact Assessment
B3 Implementation	
B3.1 Will commissioning or provider action be required before implementation of the specification can occur?	Service organisation action Please specify: Phased implementation proposed within commissioning implementation plan
B3.2 Time to implementation: Is a lead-in time required prior to implementation?	Yes - go to B3.3 If yes, specify the likely time to implementation: Phased implementation proposed within commissioning implementation plan

B3.3 Time to implementation: If lead-in time is required prior to implementation, will an interim plan for implementation be required?	Yes If yes, outline the plan: Click here to enter text.
B3.4 Is a change in provider physical infrastructure required?	Yes Potential need for further access to services for thrombectomy when the neuroscience centres consider transfer times.
B3.5 Is a change in provider staffing required?	Yes See above Increase in number of interventional neuroradiologists or equivalent role to deliver thrombectomy 24/7 and acute aneurysm coiling 7/7.
B3.6 Are there new clinical dependency and/or adjacency requirements that would need to be in place?	Yes Please specify: Full immediate access to imaging, critical care and anaesthetics as detailed in the service specification. Approximately ¾ of patients will require an additional ambulance transfer therefore access to critical (critical response times) ambulance transfer.
B3.7 Are there changes in the support services that need to be in place?	Yes Please specify: CT Angiography needs to be available for stroke patients in any hospital admitting/managing acute stroke. Acute stroke care unit and HASU and access to patient transport for repatriation.
B3.8 Is there a change in provider and/or inter-provider governance required? (e.g. ODN arrangements / prime contractor)	No Please specify:

	Operational D Stroke service	•	(ODN) framework alr	eady in place f	or
B3.9 Is there likely to be either an increase or decrease in the number of commissioned providers? If yes, specify the current and	Increase Please complete table: Not applicable				
estimated number of providers required in each region	Region	Current no. of providers	Future State expected range	Provisional or confirmed	
	North	8	8	<u>C</u>	
	Midlands & East	5	6-7	<u>P</u>	
	London	6	4-5	<u>P</u>	
	South	5	5	<u>C</u>	
	Total	24	24-26	<u>P</u>	
	neuroscience placed for urg	in centres delive centre will be phagent access and	ring thrombectomy or nased to ensure that of sustainable with appropriately puirement for 3-5 of the	centres are equipolate opriate through	nput. İt
B3.10 Specify how revised provision will be secured by NHS	Select all that apply:				
England as the responsible commissioner.		Publication and notification of new Service Specification			
	Market inter	vention required			
		selection proces	s to secure increase on	or 🗆	

	Price-based selection process to maximise cost effectiveness			
	Any qualified provider			
	National C	National Commercial Agreements e.g. drugs, devices		
	Procurem	ent		
	Other			
	Please spe Click here	ecify: to enter text.		
B4 Place-based Commissioning				
B4.1 Is this service currently subject to, or planned for, place-based commissioning arrangements? (e.g. future CCG lead, devolved commissioning arrangements, STPs)	No Please specify: Click here to enter text.			
Section C	- Finance Ir	npact		
C1 Tariff/Pricing				
C1.1 How is the service contracted and/or charged?	Select all	that apply:		
Only specify for the relevant section of the patient pathway		Not separately charged – part of local or nati tariffs	ional	
	Drugs	Excluded from tariff – pass through		\boxtimes
		Excluded from tariff - other		

		Not separately charged – part of local or national tariffs	
	Devices	Excluded from tariff (excluding ZCM) – pass through	
		Excluded from tariff (excluding ZCM) – other	
		Via Zero Cost Model	
		Paid entirely by National Tariffs	
	Activity	Paid entirely by Local Tariffs	
		Partially paid by National Tariffs	\boxtimes
		Partially paid by Local Tariffs	
		Part/fully paid under a Block arrangement	
		Part/fully paid under Pass-Through arrangements	
		Part/fully paid under Other arrangements	
		ue cost per patient is based on HRG YA13Z. CIC – Clinical Classifications Service issued on the 26	
	November	2016, the OPCS-4 codes for Mechanical clot retrieval four telescopies are:	r
	1. L71.	2 Percutaneous transluminal embolectomy of artery	
	Includes: P	ercutaneous transluminal thrombectomy of artery:	
		- Approach to organ under image control	
	• Z35	. Cerebral artery or O28.1 Basilar artery	

	2. ICD-10 of I63.9 Cerebral infarction, unspecified (in conjunction with the codes above this will identify Thrombectomy activity).
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.	Not applicable
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 applicable
C1.4 Activity Costs covered by National Tariffs List all the HRG codes, HRG descriptions, national tariffs (excluding MFF), volume and other key costs (e.g. specialist top up %)	Click here to enter text. Thrombectomy Pathway: A patient would have: 1. Both the specialty code and treatment function code should be reported as 400 for Neurology. This is to ensure that the activity does not default to CCGs and the specialised top up is applied consistently across all providers 2. The revenue cost per patient is based on HRG YA13Z. The cost of the device is included in the tariff. (As detailed in the NICE IPC548

	 which describes the appropriate coding of mechanical clot retrieval.) 3. As per HSCIC – Clinical Classifications Service issued on the 26 November 2016, the OPCS-4 codes for Mechanical clot retrieval for treating acute ischaemic stroke are: 4. L71.2 Percutaneous transluminal embolectomy of artery 5. Includes: Percutaneous transluminal thrombectomy of artery: 6. Y53 Approach to organ under image control 7. Z35. Cerebral artery 8. ICD-10 of I63.9 Cerebral infarction, unspecified (in conjunction with the codes above this will identify Thrombectomy activity).
C1.5 Activity Costs covered by Local Tariff	Not applicable
List all the HRGs (if applicable), HRG or local description, estimated average tariff, volume and any other key costs. Also indicate whether the Local Tariff(s) is/are newly proposed or established and if newly proposed how is has been derived, validated and tested.	
C1.6 Other Activity Costs not covered by National or Local	Not applicable
Tariff	
Include descriptions and estimates of all key costs.	
C1.7 Are there any prior approval mechanisms required either	No No
during implementation or permanently?	Please specify:
C2 Average Cost per Patient	
C2.1 What is the estimated cost per patient to NHS England, in years 1-5, including follow-up where required?	YR1 £13,885

	YR2	£13,885	
	YR3	£13,885	
	YR4	£13,885	
Are there any changes expected in year 6-10 which would impact	YR5	£13,885	
the model?	If yes, please No	specify:	
C3 Overall Cost Impact of this Service Specification to NHS Eng	gland		
C3.1 Specify the budget impact of the proposal on NHS England in	Cost neutral		
relation to the relevant pathway.	Please specify	y:	
	Costs covered	d within implementation	n of the thrombectomy policy
C3.2 If the budget impact on NHS England cannot be identified set out the reasons why this cannot be measured.	Not Applicable	Э	

C4.1 Specify the budget impact of the proposal on other parts of the NHS.	Budget impact for CCGs: Cost neutral Budget impact for providers: No impact on providers Please specify:
C4.2 Taking into account responses to C3.1 and C4.1 specify the budget impact to the NHS as a whole.	Cost neutral Please specify: Costs associated with thrombectomy policy not service specification. The assumption is cost neutral for the service specification. Year 1: £0.0m Year 2: £0.0m Year 5: £0.0m
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?	Yes Please specify: Yes: It is expected that savings generated would also arise outside the healthcare system through a reduction in rates of disability and dependence in stroke survivors. Poor outcomes after stroke are disproportionately much higher in the stroke patients eligible for thrombectomy
C5 Funding	

C5.1 Where a cost pressure is indicated, state known source of
funds for investment, where identified, e.g. decommissioning less
clinically or cost-effective services.

N/A

C6 Financial Risks Associated with Implementing this Service Specification

C6.1 What are the material financial risks to implementing this Service Specification?

There may be risks around the implementation plan (Commissioning) being proposed and how quickly the current services can be mobilised to meet the requirements for a 24/7 service, this is due to the current low numbers of staff to carry out the intervention:

A further potential risk is around the level of confidence in the activity assumptions. These are based on assumptions from current clinical practice and therefore may overstate future activity.

There are ongoing randomised trials that may extend the evidence base in terms of reducing the proportion of thrombectomy exclusions. For instance:

- Strokes where time onset is unknown (e.g. wake up strokes) may be proven to benefit from thrombectomy (†15%)
- Thrombectomy for more vessel occlusion sites may become evidence based (†2-5%)
- Thrombectomy may be proven for mild strokes with LAO present (↑15-20%).

Together these ongoing trials could increase numbers eligible by ~35%.

If these trials are published and change is considered a new proposal will be submitted for consideration for funding.

C6.2 How can these risks be mitigated?	The phased implementation plan as described in C6.1 above is intended to provide this mitigation due to current service configuration and a shortage in trained staff to (i.e. neuro-interventionists).	
C6.3 What scenarios (differential assumptions) have been explicitly tested to generate best case, worst case and most likely total cost scenarios?	Phased implementation as per the commissioning plan.	
C6.4 What scenario has been approved and why?	The mid-point of the expected cohort has been modelled as this is the most likely number of patients each year (excluding backlog).	
C7 Value for Money		
C7.1 What published evidence is available that the treatment is cost effective as evidenced in the evidence review?	Published evidence indicates the treatment has the potential to be cost-effective Please specify: NICE- Mechanical clot retrieval for treating acute ischaemic stroke - Interventional Procedures Guidance [IPG548] Published date: February 2016 Sentinel Stroke National Audit Programme Cost and cost-effectiveness analysis 2016	
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	\boxtimes
	The data does not support a high level of certainty about the impact on value	
	Please specify:	
	Service development required to achieve numbers of specialist staff	·
C8 Cost Profile		
C8.1 Are there non-recurrent capital or revenue costs associated with this Service Specification?	Yes	
	If yes, specify type and range:	
	PACS workstations at home for all neurointerventionists on the coiling/thrombectomy rota & with full connectivity to all hospital PAC systems referring into their service (circa £12,000 per interventionist	
C8.2 If yes, confirm the source of funds to meet these costs.	Capital funding to be covered by provider development plans	