

Integrated Impact Assessment Report for Service Specifications							
Service Specification Reference Number	E01/S/a						
Service Specification Title		Clinical Genomics (Adults and Children) Proposal <u>for routine commission</u> (source A3.1)					
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	Integrated Impact Assessment – Index						
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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.	Rare diseases are understood to impact on the lives of approximately 6-8% of the population, although it is acknowledged this may be an under representation as we gain in knowledge. It is estimated that at least 80% of rare diseases are genetic, with many of them due to a single genetic or chromosomal change ¹ . A total of 305,683 individuals were diagnosed with cancer in 2017, with approximately 5-10% arising in individuals with a genetic predisposition and a significantly increased risk of developing certain tumour types ² . <i>Source: Service Specification Proposition section 5.1</i>			
A1.2 Number of patients currently eligible for the service according to the proposed service specification commissioning criteria.	Up to circa. 128.5k in 2022/23 Source: Local calculation Please specify Index Cases: Percentage incidence of rare diseases and cancer with genetic predisposition included within Service Specification (80% of 6-8% population annual incidence of Rare Disease; 5- 10% of cancer annual incidence) compared to Office of National Statistic population forecasts. Cascade Referrals: Assumed an average of one cascade referral (family member at increased risk of condition with genetic pre-disposition) per Index Case. Negative Diagnoses: Assumed 50% of patients that meet the eligibility criteria go on to receive a negative diagnosis. Calculations consider the impact of embedding genomics into mainstream clinical pathways and routine care ('mainstreaming'), which is a primary aim of the revised service specification. The revised service specification also aspires to increase equity of access for patients across England and provide the infrastructure required to embrace the impact of the identification of novel conditions			

¹ <u>https://www.raredisease.org.uk/</u> ² <u>https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/bulletins/cancerregistrationstatisticsengland/final2016#cancer-incidence-over-the-last-decade</u>

	population. The methodology for variations in incidenc	calculation de e or populatio additional risl	oes not include v n demographics < factors. In addi	veighting o . Further v ition, the e	expected to increase the eligible of population based on geographical work is required to standardise the stimated eligible population includes undiagnosed patients.
A1.3 Age group for which the service is proposed according to the service specification commissioning criteria.	All ages Please specify Eligible population ca eligible population by increases significantly	age range, a	is examples 75%	e demogra	phics. There may be disparities in seases affect children; cancer incidence
A1.4 Age distribution of the patient population eligible according to the proposed service specification commissioning criteria		nting the demo	ographic profile o		e eligible population and there are against prevalence and incidence by
A1.5 How is the population currently distributed geographically?	Unevenly If unevenly, estimate NHS England Regio	Ū			
	North West	12%	South West	10%]
	North East & Yorkshire	12%	Midlands	23%	

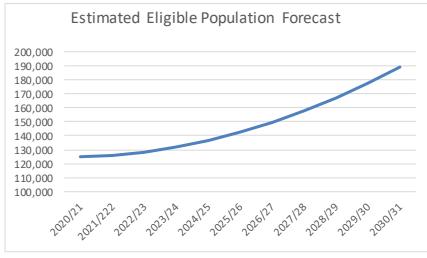
	London	16%	East of England	8%	
	South East	16%			
	Genomic Laboratory	Hub Regic	onal Distribution	l	
	North West	16%	South West	15%	
	North East & Yorkshire	19%	Central and South	14%	
	North Thames	13%	East of England	8%	
	South East	15%			
	population distribution based on the geograph We have also included boundaries do not alig	HS England reported by nical variation the NHS Con with those are expect	d Regional Distrik the Office of Na ons in incidence Genomic Laborato for the NHS Eng ed to align to indi	oution are o tional Statis and risk fac ory Hub (NI gland Regio	alculated based on the overall stics. However, these may change tors. HS GLH) Regional Distribution as the ons, and the NHS Clinical Genomic GLHs as part of the overall NHS
A2 Future Patient Population & Demo	graphy				
A2.1 Projected changes in the disease/condition epidemiology, such as incidence or prevalence (prior to	Increasing				

applying the new service specification) in 2, 5, and 10 years?	genomic testing t increase as genc the NHS through awareness through	technologies improvemics and genomic implementation of	crease due to the identification of novel genetic conditions and as ve and increase. We would also expect the eligible population to testing becomes further embedded as routine practice across the NHS Long Term Plan, mainstreaming and increased sition section 5.1
A2.2 Are there likely to be changes in demography of the patient population and would this impact on activity/outcomes?	access to the ser work in partnersh engagement with To achieve this, if their NHS GMS / development of o specification. Whilst the demog improving equity	rvice is equitable ac hip with their NHS of communities that h providers will work to Alliance to address consistent eligibility graphy of patients is of access, is expect	d, by way of the revised service specification, to ensure that ross their entire catchment area. As part of this, providers will MS Alliance to reduce barriers to access and improve have historically not been reached. o understand the needs of their local population and work with identified unmet need. This will be supported by the criteria during the commissioning implementation of this service a not expected to change, reducing barriers to access, and ted to increase demand for some services.
A2.3 Expected net increase or decrease in the number of patients who	YR2 +	3,495	
will be eligible for the service, according to the proposed service specification commissioning criteria, per year in years 2-5 and 10?	YR3 +	4,660	
	YR4 +	5,825	
	YR5 +	6,989	
	YR10 +	11,649	
	Source: Service	specification propos	sition section 5.1 and commissioner forecast

<u>No</u>

Are these numbers in line with ONS growth assumptions for the age specific population? If not please justify the growth assumptions made.

The increase in eligible population considers the impact of mainstreaming clinical genomics, equity of access plus the impact of identification of novel conditions and implementation of new testing technologies. The increase in eligible population is expected to be phased over the coming 10 years in response to the transformation work undertaken through the NHS GMS with access to services for a total estimated eligible population of circa. 189k people by 2030/31.



A3 Activity

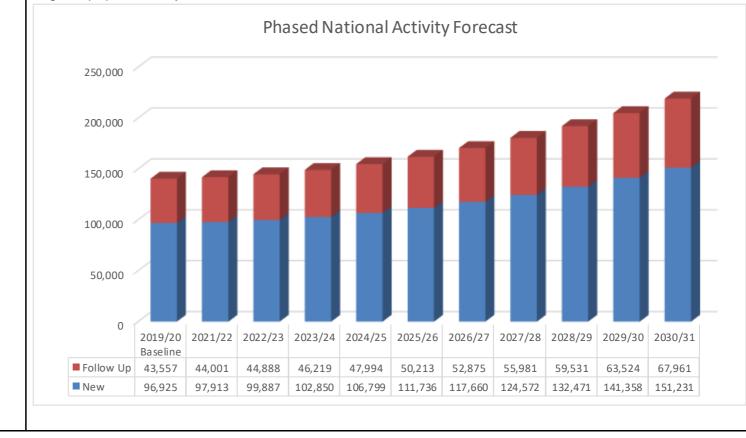
A3.1 What is the purpose of new	Revision to an existing published service specification
service specification?	*PSSAG (Prescribed Specialised Services Advisory Group)
	Please specify
	The existing NHS CGS specification was published in 2013 and included both clinical genetics and genomic testing services. Since its publication, the NHS GMS has been established, leading to the separation of the clinical genomic and laboratory functions through the formation of NHS GLHs. It is

	 important that the revised specification formation of the NHS GMS. It also need 1) The delivery of NHS CGSs as a the NHS GMS Alliances. 2) Highlighting new ways of working clinics, multi-disciplinary teams (multidisciplinary clinics (MDCs). 3) Recognition of the roles of all the ensure optimal use of skills. 4) Adaptation of the workforce to reincreased provision of testing increased range of cancer genor 5) To reinforce the need to ensure of groups based on clinical need; a 6) The increased role of mainstream will support colleagues to facilitation 	ds to reflect developm network, working in ta g through virtual (onlin MDTs), genomic test e health care profession flect the rapid advance cluding rapid exome so nic testing, and whole equity of access and p nd n medicine in the delive	nents within the NHS andem with the NHS andem with the NHS e and telephone) ar advisory boards (GT onal groups within cl ces in genomic testin equencing, specialis genome sequencing provision of genomic very of genomics an	GLHs supported by GLHs supported by d face to face ABs), and inical genomics to g technology, t genetic testing, g. testing to all
A3.2 What is the annual activity associated with the existing pathway for the eligible population?	140,482 (including provider reported ne Source: NHS CGS Data Collection - Ju Please specify Given the reduced demand for services 2020/21, we anticipate that the activity of annual activity associated with the exist to the variation in completeness of activithe differing methods of recording activity Total New Appointments Total Follow-Up Appointments Total Activity	ne 2021 experienced during the undertaken in 2019/20 ting pathways. Howev vity reported during the	he COVID-19 pande) is the most reliable ver, this activity may e data collection, rep	indication of be understated due

activity associated with the proposed service specification proposition pathway for the eligible population?
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2019/20 baseline year at circa. 2:1, which is in line with national guidance (Royal College of Physicians Clinical Genetics: Workforce and Job Planning (2017).

The Phased National Activity Forecast assumes that demand and activity will increase from the 2019/20 baseline outturn activity to a level that provides access for 80% of the estimated national eligible population by 2030/31.



A4 Patient Pathway

A4.1 Patient pathway Describe the current patient pathway and service.	Referrals for patients and their family where there is a confirmed or suspected genetic condition are currently received from GPs or clinicians in secondary care. Services are provided through a Hub and Spoke Model, with a single Provider responsible for delivering the NHS CGS from outpatient facilities within the host trust and via outreach within district general hospitals or other suitable settings across the geographical catchment area of the service. Within the clinic, the patient and/or their family will be assessed by the most appropriate clinician(s) to identify the risk of inheriting or developing a genetic condition. Where required, the NHS CGS clinicians will facilitate the collection of tissue/samples for clinical diagnostic testing. Genomic diagnostic tests are performed by the NHS GLHs in line with the National Genomic Test Directory. Follow-up appointments are provided to discuss the results of diagnostic tests. There are also occasions when patients and/or family members are re-referred to the service if new clinical information or risk factors are identified. The NHS CGSs are not restricted to the facilitation of diagnosis, rather they also provide long term management of individuals, particularly those with multi-system disease that require surveillance coordinating by the service and counselling services for patients and families. Longer term support may also be required for those patients that require annual screening programmes, which are again facilitate testing and then receive their diagnosis (either positive or negative), there are some that remain under the care of the service for some years. <i>Source: Service specification proposition section 7.2</i>
A4.2. What are the current service access and stopping criteria?	 Current access and exclusion criteria differ between NHS CGSs. A review of current criteria indicates that access to the service is available across all services for: Patients that live within the NHS CGS catchment population. General Genetics, such as those patients with or at risk of having a genetic condition themselves or in their family that is not part of the exclusion criteria. High risk cancers, according to agreed criteria. Significant variation occurs within the exclusion criteria. Five of the thirteen NHS CGSs that provided detail of their criteria exclude self-referrals despite them being described as a potential

	 referral source within the currently published service specification. Another area of significant variation is Alpha-1 antitrypsin deficiency, with seven out of thirteen providers explicitly excluding it but others considering it part of the eligible population. There are other examples of disparities in acceptance and exclusion criteria across NHS CGS subspecialties, such as (but not restricted to): Autism/developmental delay Familial Hypercholesterolaemia Hypermobility syndromes, including Ehlers Danlos Syndrome Cystic Fibrosis Screening The differences at a subspecialty level are likely to be due to the ways in which local services have developed such as availability of relevant clinical expertise locally. It is expected that the new service specification will lead to a reduction in the number of patients under the care of clinical genetic services for the facilitation of testing only as these will typically be managed within mainstream services. However, the increase in testing within mainstream services is expected to increase the number of patients diagnosed with a rare disease or cancer/risk of cancer with a genetic predisposition which will lead to a higher number of complex patients referred to clinical genomic services that require longer term management and increased clinical input. NOTE: There is scope to develop consistent and agreed inclusion and exclusion criteria as part of the Commissioning Implementation Plan for the revised Service Specification to ensure equity of access across the population. Norce: NHS CGS Data Collection – June 21 and Service specification proposition section 5.1
 A4.3 What percentage of the total eligible population are: a) Referred b) Meet any existing criteria for care c) Considered to meet any existing exclusion criteria 	If not known, please specify N/A a) 60% b) 46% c) 10% Source: NHS CGS Data Collection – June 21

 A4.4 What percentage of the total eligible population is expected to: a) Be referred to the proposed service b) Be eligible for care according to the proposed criteria for the service c) Take up care according to the proposed criteria for the service d) Continue care according to the proposed criteria for the service? 	If not known, please specify We have assumed that the NHS CGS increases access to meet 80% of the estimated eligible population. Consistent eligibility criteria will be developed as part of the Commissioning Implementation Phase of specification roll-out. Mainstreaming is expected to increase the proportion of genomic testing that is requested directly through mainstream services, which will reduce the proportion of diagnostic cases referred to the NHS CGS over time, particularly for those patients that go on to receive a negative result. However, given the expected increase in the number of diagnoses made in mainstream services, there is likely to be an increase in the proportion of cases referred to NHS CGSs that meet the eligibility criteria, an increase in the complexity of those patients and the length of time that they remain on the caseload. a) Not known b) 80% c) Not known d) Not known Source: Local calculations
A4.5 Specify the nature and duration of the proposed new service or intervention.	Time limited For time limited services, specify frequency and/or duration.Patients may receive one off diagnostic care that leads to a negative result and no further intervention. Alternatively, patients may require time limited care to receive required counselling along with lifestyle and condition management advice. Lifelong care may be required, with patients re-referred to the services some years after their initial diagnosis as further intervention is required such as advice in relation to risk management surgery.Source: Commissioner developed text
A5 Service Setting	

A5.1 How is this service delivered to	Select all that apply:		
the patient?	Emergency/Urgent care attendance		
	Acute Trust: inpatient	\boxtimes	
	Acute Trust: day patient		
	Acute Trust: outpatient	\boxtimes	
	Mental Health provider: inpatient		
	Mental Health provider: outpatient		
	Community setting		
	Homecare		
	Other		
	provided from outpatient facilities across However, the COVID-19 pandemic has are provided with the cessation of most patients were seen face to face by the undertaken non-face to face. However receiving non-face to face care increase joint consultations with other specialties patients. Clinical care including advices without direct patient care if clinically a phenotype data and advise the manage Patients may also be managed across	ss the s led t st sate NHS r, duri sed to s to in s, diag pprop ing cl geog	batients through a hub and spoke model, with services geographical catchment area of each NHS CGS o a reduction in the number of sites from which services lite services. Typically, pre-COVID in 2018/19, most CGSs, with an average of 27% of consultations ing 2020/21, the average percentage of patients a mean of 55%. NHS CGS clinicians may undertake inprove clinical pathways and reduce the burden on nosis and clinical management may also be provided riate; for example, clinicians may review genomic and inician directly of as art of a multi-disciplinary meeting. raphical boundaries if an NHS CGS has specific nomics that is not available within the local NHS CGS.

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A5.2 What is the current number of	North West	2	
contracted providers for the eligible population by region?	North East & Yorkshire	3	
	Midlands	3	
	East of England	1	
	London	4	
	South East	2	
	South West	2	
A5.3 Does the proposition require a change of delivery setting or capacity requirements?	<u>yes</u> Please specify:		
	Delivery Setting		
	A full analysis of the geographical locations of all satellite locations for NHS CGSs has not been possible as the information was not supplied by all providers as part of the data collection exercise. Ten of the seventeen providers supplied details of the satellite services that they provide. The information provided indicates that the number of sites per 100,000 catchment population varies from 0.1 to 0.44, with a mean average of 0.29 and a median of 0.31.		
	This indicates that there may be scope to increase the number of satellite services delivered by some providers. However, further work would be required to establish the geographical area that services cover balanced with the impact of increased non-face to face consultations to patient experience and equity of access. In addition, it will be important to consider the reduced availability of satellite locations due to the impact of the Covid-19 pandemic.		
	Capacity		
	Rationale for a job planning	document for Co	for both Clinical Geneticists (Clinical Genetics Society onsultants in Clinical/Medical Genetics (2020)) and Nurses and Counsellors Career Structure for Genetic

Counsellors and Support Roles (January 2021)), the capacity required to meet the 2019/2020 baseline activity has been calculated.
The capacity required to undertake the 2019/20 baseline activity was compared to the actual establishment across England taken from the NHS CGS data submissions (June 21) and highlights a minimum indicative staffing deficit of approximately 10 clinical geneticists. This problem is compounded by a vacancy rate of over 16% in June 2021 and an expectation that approximately 30 clinical geneticists are likely to retire during the coming 5 years.
Whilst the overall number of Genetic Counsellors in establishments across England initially appears sufficient to manage baseline activity it's important to note that this is adversely impacted by a vacancy rate of 9.5% at the time of the data submissions. In addition, the Genetic Counsellor establishment at some organisations compares poorly with the number of staff needed to manage demand whilst others compare much better.
Based on the calculations, the capacity required to meet forecast demand across the coming 10 years is expected to increase assuming there are no changes in first to follow up ratio and the split of activity by clinical geneticist (Consultant Led) and genomic counsellor (Non-Consultant Led) remains the same.

	National capacity required to meet forecast demand (WT	E) Current Clinical Geneticist Establishment Current Genomic Counsellor Establishment
	100 50 0 2019/20 2021/22 2022/23 2023/24 2024/25 2025/26 2026/27 2027/28 2028/29 2029/30 2030/31 Baseline	Genomic Counsellors Required - Total Activity Clinical Geneticists Required - Total Activity
	NOTE: Due to the variability in findings across NHS CGSs from the data collect undertaken in June 2021, this analysis is only indicative and requires robust valia refinement. Rather, it highlights the need for robust activity and finance monitori developed and introduced to inform detailed activity and demand, workforce and <i>Source: NHS CGS Data Collection – June 21 and Local Calculations</i>	dation and ng frameworks to be
A6 Coding		
A6.1 Specify the datasets used to record the new patient pathway activity.	Select all that apply:	
	Aggregate Contract Monitoring *	

*expected to be populated for all commissioned	Detiont lovel contract manifering		
activity	Patient level contract monitoring	\boxtimes	
	Patient level drugs dataset		
	Patient level devices dataset		
	Devices supply chain reconciliation dataset		
	Secondary Usage Service (SUS+)	\boxtimes	
	Mental Health Services DataSet (MHSDS)		
	National Return**	\boxtimes	
	Clinical Database**		
	Other**		
	**If National Return, Clinical database or other	selecte	d, please specify:
	Before undertaking a bespoke data collection f Service (SUS) data was undertaken. The histo indicates that this is not currently a robust way	rical re	cording of clinical genomic activity on SUS
	2019/20 actual outturn activity recorded on SU 37,351 follow up patient appointments were un the new patient activity reported by providers th up activity. In addition, clinical genomic activity trusts, significantly more than the 17 commission	dertake nrough ⁄ (Treat	en. SUS activity reflects approximately 68% of the data collection exercise and 85% of follow ment Function Code 311) was submitted by 68
	Therefore, it is proposed that a single national is developed as part of the Commissioning Imp following publication of the new service specific	lement	
A6.2 Specify how the activity related to	Select all that apply:		
the new patient pathway will be identified.	OPCS v4.8		
	ICD10		

	Service function code	\boxtimes	
	Main Speciality code	\boxtimes	
	HRG		
	SNOMED		
	Clinical coding / terming methodology used by clinical profession	\boxtimes	
A6.3 Identification Rules for Drugs: How are any drug costs captured?	Not applicable If already specified in the current NHS England Drug / Devices List, please specify drug name and indication for all that apply: N/A If drug(s) NOT already been specified in the current NHS England Drug List please give details of action required and confirm that this has been discussed with the pharmacy lead: N/A NOTE: There are currently no drug costs in relation to the NHS CGS. However, it is recognised that the introduction of pharmacogenomic prophylactic prescribing of treatments to prevent the occurrence of genomic conditions may be required in the future. A pathway for the management of 'well' patients, at risk of a condition with a genomic predisposition, will need to be considered in response to the implementation of pharmacogenomics as the patients involved are unlikely to require treatment and management by clinical specialities. Therefore, the prescribing of high cost drugs may become the responsibility of the NHS CGSs, the impact of which should be considered as part of the NHS GMS Pharmacogenomic Workstream.		
A6.4 Identification Rules for Devices: How are device costs captured?	Not applicable If device(s) covered by an existing category of the National Tariff Payment System Guidance) N/A		

	If device(s) 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. N/A
A6.5 Identification Rules for Activity: How are activity costs captured?	Not captured by an existing specialised service line If activity costs are already captured please specify the specialised service code and description (e.g. NCBPS01C Chemotherapy). N/A If activity costs are already captured please specify whether this service needs a separate code. M/A If 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. N/A If the activity is not captured please specify whether the proposed identification rules have been documented and agreed with the Identification Rules team. N/A If the activity is not captured please specify whether the proposed identification rules have been documented and agreed with the Identification Rules team. It is proposed that a single national dataset for the recording and reporting of NHS CGS activity and associated costs is developed as part of the Commissioning Implementation Plan. We anticipate implementation of the revised dataset during Year One of specification roll-out, with development of a financial model during Year Two. Shadow Monitoring against the activity and financial framework is recommended for Year Three, allowing for further refinement as required. Full Implementation of the new financial model is proposed for Year Four.
A7 Monitoring A7.1 Contracts Specify any new or revised data flow or data collection requirements, needed for inclusion in the NHS Standard Contract Information Schedule.	Yes - other Please specify Single national dataset for development during the Commissioning Implementation Phase

Please identify any excluded drugs or devices relevant to the service and their current status with regard to NHS England specialised services commissioning.	
A7.2 Business intelligence Is there potential for duplicate reporting?	Yes If yes, please specify mitigation: The risk of duplicate reporting will be mitigated through the development of a single national reporting framework for implementation in Year One of specification roll-out
A7.3 Contract monitoring Is this part of routine contract monitoring?	Yes If no, please specify contract monitoring requirement: N/A
A7.4 Dashboard reporting Specify whether a dashboard exists for the proposed service?	No If yes, specify how routine performance monitoring data will be used for dashboard reporting. N/A If no, will one be developed? A Quality Dashboard will be developed to reflect the indicators contained within Section 6.2 of the revised specification. The Quality Dashboard will be published on the NHS England website (<u>Specialised services quality dashboards</u>). In addition, development of an activity dashboard in line with the proposed dataset will be considered as part of the Commissioning Implementation Plan.
A7.5 NICE reporting Are there any directly applicable NICE or equivalent quality standards which	Yes If yes, specify how performance monitoring data will be used for this purpose. Adherence to current clinical guidelines, including NICE guidelines for Lynch Syndrome, cancer, familial hypercholesterolaemia will be monitored a part of routine contract monitoring.

Section B - Service Impact		
B1 Service Organisation		
B1.1 Describe how the service is currently organised? (i.e. tertiary centres, networked provision etc.)	Services have historically been provided to patients through a hub and spoke model, with services provided from outpatient facilities across the geographical catchment area of the NHS CGS. However, the COVID-19 pandemic has led to a reduction in the number of sites from which services are provided with the cessation of most satellite services.	
	The NHS CGSs are an essential core element of the delivery of the NHS GMS, which includes a network of seven NHS GLHs that deliver genomic testing and seven NHS GMS Alliances that lead on service development and transformation across the network.	
	There are also links between the NHS CGSs and the Cancer Alliances and Pathology Networks across the country.	
	Source: Commissioner developed text	
B1.2 Will the specification change the way the commissioned service is organised?	Yes Please specify: The service specification aligns the NHS CGSs position in the national NHS GMS network, ensuring that they are a key partner in all transformation and NHS GMS transformations.	
	Whilst mainstreaming is expected to lead to increase the proportion of genomic testing that is requested through mainstream services and reduce the proportion of diagnostic cases referred to the NHS CGS that go on to receive a negative result, it is expected to increase demand placed on NHS CGS in other areas such as:	
	 Education and training provided to mainstream clinicians Participation in Multi-disciplinary Team meetings Expert advice and guidance provided to mainstream services and primary care Contribution to NHS GMS transformation programmes and NHS GMS Alliances Eligible patients referred to NHS CGSs Complexity of patients managed by NHS CGSs 	

	1
	 Length of time those more complex patients remain on the caseload
	Therefore, sufficient capacity needs to be built into the workforce to support this additional burden likely to be placed on NHS CGSs.
	Source: Commissioner developed text
B1.3 Will the specification require a	<u>Other</u>
new approach to the organisation of care?	Please specify:
	A full review of the Hub and Spoke model previously delivered by NHS CGSs needs to be reviewed in view of ensuring that services provide equity of access across their geographical area balanced with the impact of increased non-face to face activity, in particular considering any potential impact on patient experience. In addition, it will be important to consider the reduced availability of satellite locations due to the impact of COVID-19.
	Furthermore, it will also be important to review the scope of professional roles within services to identify areas of shared practice and the distinctions between role profiles for clinical geneticists, genetic counsellors and the new support roles of the genomic associate and genomic practitioner. The appropriate devolution of some areas of practice is likely to free up clinical capacity for direct patient care, supporting services to meet the forecast demand for services in a cost-effective manner. This may also include the increase of joint appointments for NHS CGS staff within other clinical specialties.
	As part of the commissioning implementation phase, we propose work jointly with Regional Specialised Commissioning colleagues and service providers to develop consistent operating procedures, including intra-specialty collaboration to achieve mainstreaming and consistent eligibility criteria.
	Consistent pathways to specialist clinical psychology will need to be developed to ensure that individuals affected by certain complex genomic conditions receive sustained psychological support. This may include joint working with Mental Health commissioners to ensure that adequate specialist capacity is available within local mental health services or the recruitment of clinical psychologists directly into the NHS CGS workforce.
B2 Geography & Access	

B2.1 Where do current referrals come	Select all that apply:		
from?	GP	\boxtimes	
	Secondary care	\boxtimes	
	Tertiary care	\boxtimes	
	Other	\boxtimes	
	Please specify: Other includes:		
	 National Screening Pro Emergency department Community services, in Self-referrals 	•	
B2.2 What impact will the new service specification have on the sources of referral?	<u>No impact</u> Please specify: N/A		
B2.3 Is the new service specification likely to improve equity of access?	Increase Please specify: A primary aspiration of the ner reflected in the forecast dema Source: Equalities Impact Ass		
B2.4 Is the new service specification likely to improve equality of access and/or outcomes?	Mainstreaming of genomic set	ion is expected to improve equality of access and patient outcomes. rvices will help to raise awareness of the testing available and increase is with a genetic predisposition. This will also lead to an increase in the	

	number of family members identified at high risk so that their risk of developing conditions with a genomic predisposition can be minimised. In addition, it is hoped to reduce the diagnostic odyssey experienced by many people with rare diseases that often utilise healthcare services heavily and are reliant on 'trial and error' prescribing to manage their condition and associated symptoms. <i>Source: Equalities Impact Assessment</i>
B3 Implementation	
B3.1 Will commissioning or provider action be required before implementation of the proposition can occur?	Data monitoring action Contract action Finance action Service organisation action Please specify: To support implementation of the new service specification, it will be essential to develop a robust Commissioning Implementation Plan jointly with commissioners and providers. Specifically, the Commissioning Implementation will need to include a national approach to: • Establishing a single, national reporting framework for activity and cost, potentially with
	 Consistent operating procedures, including intra-speciality collaboration to achieve mainstreaming and consistent eligibility criteria A service delivery model that provides equity of access across England, including minimum hub and spoke requirements to meet local geographical demand and achieving equity of service provision Developing an optimum workforce structure with a skill mix that is capable of meeting forecast demand in view of potential additional roles such as genomic assistants and associates Work with Health Education England to ensure systems are in place to increase available staff to meet future demand

	 Developing a consistent financial model that supports the required capacity and service delivery model, achieving equity of access and supporting transformational requirements within the NHS GMS.
B3.2 Time to implementation:	Yes - go to B3.3
Is a lead-in time required prior to implementation?	If yes, specify the likely time to implementation: 2 years
B3.3 Time to implementation:	Yes
If lead-in time is required prior to	If yes, outline the plan:
implementation, will an interim plan for implementation be required?	A detailed Commissioning Implementation Plan will be developed jointly with providers and NHSE Regional Specialised Commissioning Teams detailing mobilisation plan and timescales.
	The plan outline is expected to include four phases:
	Phase 1. Development and implementation of robust activity and financial monitoring frameworks, including development and roll-out of a consistent Patient Level Contract Monitoring across NHS CGSs, with retrospective data submission from October 2022. Development of a nationally consistent methodology to measure the impact the service has on patient outcomes. This phase will also include a full-service review undertaken jointly by NHS England and NHS CGSs, the development of standard operating procedures and consistent eligibility criteria – Year 1
	 Phase 2. Interpretation of Year 1 reported activity and financial data. Development of a workforce plan in line with actual demand outturn for Year 1 and local population needs (to be established jointly by NHS GCSs and NHS GMS Alliances). Development of a national financial model, including Market Forces Factor structure and weightings for local service specialisms/expertise and population needs. Formal notice of new financial model to be given to providers no later than 6-months prior to expected date of implementation - Year 2 Phase 3. Shadow monitoring of new financial model, activity and workforce to ensure robust, making refinements if required – Year 3
	Phase 4. Roll out of new models with contractual arrangements confirmed – Year 4

B3.4 Is a change in provider physical infrastructure required?	No Please specify: N/A
B3.5 Is a change in provider staffing required?	 Yes Please specify: As a result of the mainstreaming being undertaken, genomics is being integrated into relevant patient pathways across healthcare specialities. The Joint Committee on Genomics in Medicine summarises the impact of mainstreaming in their paper 'Investing in excellence to provide essential core expertise to the NHS Genomic Medicine Services: Role of the Clinical Geneticist' (July 2019) as: The specialist genomic workforce within the Genomic Medicine Services (GMSs), the Clinical Geneticists, Genetic Counsellors and Clinical Scientists, will need to support and educate colleagues in the safe application of genomics for patient benefit whilst continuing to be responsible for the diagnosis and management of patients with rare and ultra-rare disease. Greater genomic awareness of healthcare practitioners (HCPs) in other medical and surgical specialties has resulted in an unprecedented increase in referral rates to GMSs, as well as an increased demand for genomic multi-disciplinary meetings and clinic. Offering whole genome sequencing to all seriously ill children as part of their care will generate a large workload for Clinical laboratory teams and Clinical Geneticists as these data are complex and difficult to interpret. Championing the safe implementation of genomic medicine requires investment in the clinical expertise that is core to this mission. Based on the job planning guidance published by the Clinical Genetics (2020)) and the Association of Genetic Nurses and Counsellors (AGNC) (Career Structure for Genetic Counsellors and Support Roles (Jan 2021)), we have estimated that the current NHS CGS workforce establishment has a deficit of approximately 10 Clinical Geneticists when compared to the estimated number required to deliver 2019/20 baseline activity. This problem is compounded by a vacancy rate of over 16% in

June 2021 and an expectation that approximately 30 clinical geneticists are likely to retire during the coming 5 years.
Whilst the overall number of Genetic Counsellors in establishments across England initially appears sufficient to manage baseline activity it's important to note that this is adversely impacted by a vacancy rate of 9.5% (June 2021).
Based on the apportionment of 2019/20 baseline activity across NHS CGSs, the variance between capacity required and current establishment differs by service. However, this should be considered in view of differing levels of investment across the network per 100k catchment population and reduced levels of activity in some services because there has been a need to limit their activity within available resources rather than develop lengthy waiting lists.
In addition to the need to increase establishment within the NHS CGSs to enable them to meet the aspirations of the revised service specification for mainstreaming and improving equity of access, it will also be important to ensure a robust skill mix is developed and introduced. This will ensure there is sufficiently skilled capacity to develop new pathways of care required to achieve mainstreaming and provide the education and training required to both build the genomics workforce and develop the competence required in mainstream services. This skill mix will also need to consider the contribution made to the mainstreaming agenda by other parts of the NHS GMS.
In October 2020, the CGS and AGNC published the 'Scope of professional roles within specialist genomic medicine services', which highlights areas of shared practice and the distinctions between roles for a Consultant Clinical Geneticist, Principal/Consultant Genetic Counsellor and the new support role that is referred to as the 'Genomic Associate'.
The genomic associate role is introduced through the revised services specification, and provides administrative support for the clinic, the patient and the clinical activities of the clinical geneticist and genomic counsellor. As part of the data collection exercise undertaken in June 2021, only four of the seventeen NHS CGSs indicated that they have genomic associates incorporated into their establishment. There is scope for all NHS CGSs to consider introducing genomic associates to reduce the administrative burden on clinical geneticists and genomic counsellors, enabling them to free up additional time for patient facing activities.

B3.6 Are there new clinical dependency and/or adjacency requirements that would need to be in place?	Yes Please specify: The revised service specification emphasises the importance of access to clinical psychology to provide essential management of individuals affected by specific genomic conditions and to provide more complex or sustained psychological support. At the time the workforce data collection was undertaken, just one service employed clinical psychologists within the NHS CGS. NHS CGSs were also asked to confirm access to a psychology pathway if they did not directly employ clinical psychologists within their service. Nine services provided details of access to psychology services, five of which indicated that they had no direct access pathway available. Therefore, there is scope for services to consider employing clinical psychologists within their service or to work with mental health commissioners to secure direct access via robust pathways that are responsive to clinical genomic patients' needs.
	In addition, mainstreaming may increase the requirement for clinical geneticists and genomic counsellors to be embedded into speciality services. Four of the seventeen NHS CGSs report that they currently have clinical geneticists or genomic counsellors providing embedded sessions within mainstream services.
	Alongside embedded sessions, there will certainly be an increased need for clinical genomic input into both mainstream and NHS GLH multi-disciplinary team meetings (MDTs). NHS CGSs report that their clinical geneticists currently attend and average of approximately one Programmed Activity (PA) of MDTs per week (Max. 2.3) and genomic counsellors approximately half a session per week (Max. 1.8). The workforce planning and estimation of capacity requirements associated with this Integrated Impact Assessment allow for clinical geneticists to dedicate two PAs per week to specialist MDTs, variant interpretation, and additional genomic work; for genomic counsellors it allows for 7.5 hours (two sessions) for ongoing case management, MDT meetings and variant interpretation.
B3.7 Are there changes in the support services that need to be in place?	No Please specify: N/A

B3.8 Is there a change in provider and/or inter-provider governance required? (e.g. ODN arrangements / prime contractor)	No Please specify: N/A					
B3.9 Is there likely to be either an increase or decrease in the number of commissioned providers? If yes, specify the current and estimated number of providers required in each region	No change Please complete the table: NHS England Regional Distribution:					
	Region	Current no. of providers	Future State expected range	Provisional or confirmed		
	North West	2	2	<u>C</u>		
	North East & Yorkshire	3	3	<u>C</u>		
	London	4	4	<u>C</u>		
	South East	2	2	<u>C</u>		
	South West	2	2	<u>C</u>		
	Midlands	3	3	<u>C</u>		
	East of England	1	1	C		
	Total	17	17	C		
	NHS Genomi	c Laboratory Hu	ıb Regional Distrib	ution:		
	Region	Current no. of providers	Future State expected range	Provisional or confirmed		
	North West	2	2	<u>C</u>		
	North vvest	2	2			

			-		
	North East & Yorkshire	3	3	<u>C</u>	
	North Thames	2	2	<u>C</u>	
	South East	2	2	C	
	South West	2	2	C	
	Central and South	3	3	<u>C</u>	
	East of England	3	3	<u>C</u>	
	Total	17	17	<u>C</u>	
B3.10 Specify how revised provision will be secured by NHS England as the	Select all that		new service		
responsible commissioner.	Publication and notification of new service specification			\boxtimes	
	Market intervention required				
	Competitive selection process to secure increase or decrease provider configuration				
	Price-based selection process to maximise cost effectiveness				
	Any qualified provider				
	National Commercial Agreements e.g. drugs, devices				
	Procurement				

	Other Please spe N/A	cify:		
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: The commissioning for NHS CGS will remain with NHS England until it reaches a steady state following specification implementation, after which commissioning arrangements will devolve to Integrated Care Systems.			
Section C - Finance Impact				
C1 Tariff/Pricing				
C1.1 How is the service contracted	Select all	that apply:		
and/or charged? Only specify for the relevant section of		Not separately charged – part of local or national tariffs		
the patient pathway	Drugs	Excluded from tariff – pass through		
		Excluded from tariff - other		
	Devices	Not separately charged – part of local or national tariffs		
		Excluded from tariff (excluding ZCM) – pass through		
		Excluded from tariff (excluding ZCM) – other		

	1			
		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	\boxtimes	
		Part/fully paid under a Block arrangement	\square	
		Part/fully paid under Pass-Through arrangements		
		Part/fully paid under Other arrangements		
C1.2 Drug Costs	N/A			
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.				
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.	N/A			

NB: Discounted prices or local prices must not be included as these are subject to commercial confidentiality and must not be disclosed.	N/A
C1.4 Activity Costs covered by National Tariff List all the HRG codes, HRG descriptions, national tariffs (excluding MFF), volume and other key costs (e.g. specialist top up %)	
C1.5 Activity Costs covered by Local Tariff List all the HRGs (if applicable), HRG or local description, estimated average tariff, volume and any other key costs. Also indicate whether the Local Tariff(s) is/are newly proposed or established and if newly proposed how is has been derived, validated and tested.	Across the 11 providers that receive tariff for all or part of the contracted income there are 44 individual tariffs (See Appendix 1). A comparison of total income received during 2019/2020 with provider declared activity for the same year indicates significant variation of income by unit of activity across services (Min. £210, Max £1,510, Median £370 and Mean £490 per unit of reported activity). Similarly, there is significant variation in the provider declared total income in 2019/20 when calculating the cost per WTE clinical workforce (including both clinical geneticist and genomic counsellor establishment) (2021/22) (Min. £69k per WTE, Max £230k per WTE, Median £139k per WTE and Mean £147k per WTE). Therefore, there is scope to undertake a review of the contractual payment mechanisms cost of service delivery to ensure consistency across the clinical genetic services and ensure that the investment provided enables delivery of the services specification and achieves equity across service provision. This is proposed to be undertaken during Phase 2 of the Commissioning Implementation Plan following the development and implementation of a single, national, dataset for recording the activity and associated costs in Phase 1.
C1.6 Other Activity Costs not covered by National or Local Tariff	See Section C1.5

Include descriptions and estimates of all key costs.			
C1.7 Are there any prior approval mechanisms required either during implementation or permanently?	No Please specify: N/A		
C2 Average Cost per Patient			
C2.1 What is the estimated cost per	YR1	£630	
patient to NHS England, in years 1-5, including follow-up where required?	YR2	£630	
	YR3	Not Known	
	YR4	Not Known	
	YR5	Not Known	
Are there any changes expected in year 6-10 which would impact the model?	If yes, please specify: Cost per patient for Year 3 and beyond will be established as part of the financial model to be developed during Phase 2 of the Commissioning Implementation Plan.		
C3 Overall Cost Impact of this Service	specification to N	IHS England	
C3.1 Specify the budget impact of the proposal on NHS England in relation to the relevant pathway.	the current estima	ted service budget	pacity requirements has commenced and, when compared to , there is an indicative cost pressure. However, the estimated nd requires robust validation and refinement through a full-

	service review, workforce modelling, activity monitoring and financial analysis which will be undertaken during Phases 1 and 2 of the Commissioning Implementation Plan.
C3.2 If the budget impact on NHS England cannot be identified set out the reasons why this cannot be measured.	N/A
C3.3 If the activity is subject to a change of commissioning responsibility, from CCG to NHS England, has a methodology for the transfer of funds been identified, and calculated?	N/A
C4 Overall cost impact of this service	specification to the NHS as a whole
C4.1 Specify the budget impact of the	Budget impact for CCGs:
proposal on other parts of the NHS.	No impact on CCGs
	Budget impact for providers:
	Cost pressure
	Please specify:
	Providers would be unable to meet the forecast demand for services within current resources, leading to an inability to deliver against the proposed revised service specification. This would lead to an inability to achieve the NHS GMS and NHS Long Term Plan for mainstreaming genomics and reduce scope for achieve equity of access for the eligible catchment population. Furthermore, there would be limited scope to address the diagnostic odyssey experienced by many patients, leading to a continuation of many years of costly investigations and 'trial and error' prescribing and the negative impact on patients' quality of life.

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: Unknown: to be calculated and specified as part of Phase 1 and 2 of commissioning implementation
C4.3 Where the budget impact is unknown set out the reasons why this cannot be measured	N/A
C4.4 Are there likely to be any costs or savings for non-NHS commissioners and/or public sector funders?	No Please specify: N/A
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.	Whilst not quantified, some savings are expected through the reduction in diagnostic odysseys and the associated costs of multiple investigations and 'trial and error' prescribing. Further work to quantify the level of potential savings is required, and to establish a more robust value of the actual cost pressure, through the commissioning implementation phase.
C6 Financial Risks Associated with Im	plementing this Service specification
C6.1 What are the material financial risks to implementing this service specification?	The financial risks include the current variation in activity monitoring and financial models across all NHS CGSs, which indicate significant variation in the cost per patient across services. Therefore, without additional work undertaken during commissioning implementation, it is not possible to estimate financial pressure experienced currently across the services. However, it is important that these variations are addressed to ensure that services are resourced in line with their local patient need to ensure equity of access. It is also essential that providers have adequate capacity to

	manage both the direct patient care needs but also the additional workload introduced by the service specification, such as supporting the mainstreaming of genomics, providing expert advice and guidance to clinicians, providing valuable input into MDTs and supporting the transformation work being undertaken by the NHS GMS Alliances.
C6.2 How can these risks be mitigated?	Ensuring that robust workforce planning is undertaken in view of a comprehensive understanding of national clinical genomics activity, and development of a financial model that ensures sufficient resource for service delivery whilst delivering best possible value for money.
C6.3 What scenarios (differential assumptions) have been explicitly tested to generate best case, worst case and most likely total cost scenarios?	The calculations detailed within this Integrated Impact Assessment are expected to indicate a worst- case scenario. Further modelling will be undertaken when robust and consistent activity monitoring information is available.
C6.4 What scenario has been approved and why?	N/A
C7 Value for Money	
C7.1 What published evidence is available that the service is cost effective as evidenced in the evidence review?	There is no published evidence of cost-effectiveness Please specify: N/A
C7.2 Has other data been identified	Select all that apply:
through the service specification development relevant to the assessment of value for money?	Available pricing data suggests the service specification is equivalent cost compared to current/comparator service specification

	Available pricing data suggests the service is lower cost compared to current/comparator treatment									
	Available clinical practice data suggests the new service specification 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:									
	Consistent data collection methodology needs developing and implei Commissioning Implementation Plan	mentir	ng during Phase 1 of the							
C8 Non-Recurrent Costs										
C8.1 Are there non-recurrent revenue costs associated with this service specification?	Yes If yes, please specify and indicate whether these would be incurred or passed through to NHS England:									
	There are non-recurrent costs expected to facilitate the implementation of a new activity monitoring framework. These costs will be identified as part of developing the Commissioning Implementation Plan.									
	If the costs are to be passed through to NHS England please indicate into account in the budgetary impact.	e whe	ther this has been taken							
	No									

C8.2 Are there any non-recurrent provider capital costs associated with the service specification?	No If yes, please specify and indicate with there is a separate source of funding identified (commissioners cannot reimburse capital costs). N/A
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	Provider	Provider	Provider	ovi	Provider	ovi	ovic	ovic	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider	Provider
	Pr	Pr	Pr	Pr	Pr	Pr	Ρr	Pr	Ρr	Pro	Pro	Pro	Pro	Prc	Pro	Prc	Pro
OUTPATIENT - ATTENDANCE - FIRST - MULTI-																	
PROFESSIONAL - CONSULTANT LED																	363
OUTPATIENT - ATTENDANCE - FIRST - SINGLE																	
PROFESSIONAL - CONSULTANT LED	562		500		555										465		363
OUTPATIENT - ATTENDANCE - FIRST - MULTI																	
PROFESSIONAL - NON-CONSULTANT LED																	363
OUTPATIENT - ATTENDANCE - FIRST - SINGLE																	
PROFESSIONAL - NON-CONSULTANT LED			500	620													363
OUTPATIENT - ATTENDANCE - FOLLOW-UP -																	
MULTI-PROFESSIONAL - CONSULTANT LED				393	582												363
OUTPATIENT - ATTENDANCE - FOLLOW-UP -		ACT					ACT			ACT	ACT			ACT		ACT	
SINGLE PROFESSIONAL - CONSULTANT LED	338	TR/	500	393			CONTRACT			TR/	CONTRACT			TR/	465	CONTRACT	363
OUTPATIENT - ATTENDANCE - FOLLOW-UP -		N N					NO			NC	NO			NC		NC	
MULTI PROFESSIONAL - NON-CONSULTANT		Ŭ					Ŭ			Ŭ	Ŭ			Ŭ		Ŭ	
LED		BLOCK CONTRACT					BLOCK			BLOCK CONTRACT	BLOCK			BLOCK CONTRACT		BLOCK	363
OUTPATIENT - ATTENDANCE - FOLLOW-UP -		BL(BL(BL(BL(BL(BL(
SINGLE PROFESSIONAL - NON-CONSULTANT																	
LED			500	393													363
OUTPATIENT - NON-FACE TO FACE - FIRST -																	
SINGLE PROFESSIONAL - CONSULTANT LED			500	220	501										67		363
OUTPATIENT - NON-FACE TO FACE - FIRST -																	
SINGLE PROFESSIONAL - NON-CONSULTANT																	
LED			500	220													363
OUTPATIENT - NON-FACE TO FACE - FOLLOW-																	
UP - SINGLE PROFESSIONAL - CONSULTANT																	
LED			500	10	537										70		363

APPENDIX 1

	Provider 1	Provider 2	Provider 3	Provider 4	Provider 5	Provider 6	Provider 7	Provider 8	Provider 9	Provider 10	Provider 11	Provider 12	Provider 13	Provider 14	Provider 15	Provider 16	Provider 17
OUTPATIENT - NON-FACE TO FACE - FOLLOW-																	
UP - SINGLE PROFESSIONAL - NON-																	
CONSULTANT LED			500	10													363
OTHER: WARD VISIT																	
CLINICAL GENETICS - CLGEN (Band 6) Out																	
Patient First Appointment						612											
CLINICAL GENETICS - CLGEN (Band 1)																	
Chargeable Letter (Advice and Guidance																	
(A&G)/Results)						104											
CLINICAL GENETICS - CLGEN (Band 4) Out																	
Patient Follow Up Appointment						414											
CLINICAL GENETICS - CLGEN (Band 2)																	
Chargeable Phone Call (A&G/Results)						207											
CLGEN_BAND4b (Telephone clinic initiated																	
pre-COVID)						414											<u> </u>
OUTPATIENT - NON FACE TO FACE CONTACT												24					
OUTPATIENT - FIRST ATTENDANCE												644					
OUTPATIENT - FOLLOW UP ATTENDANCE												599					
Pre-clinic visit/follow-up - Band A													171				
New, routine referral - Band B													338				
Genetics - New, complex referral - Band C													485				
Genetics - New referral using DNA technology -													113				
Band D													4				
OUTPATIENT - NON-FACE TO FACE - FIRST -																	
SINGLE PROFESSIONAL - CONSULTANT LED																	
CANCER															117		
OUTPATIENT - NON-FACE TO FACE - FOLLOW-																	
UP - SINGLE PROFESSIONAL - CONSULTANT																	
LED CANCER															117		

	Provider 1	Provider 2	Provider 3	Provider 4	Provider 5	Provider 6	Provider 7	Provider 8	Provider 9	Provider 10	Provider 11	Provider 12	Provider 13	Provider 14	Provider 15	Provider 16	Provider 17
Clinical Genetics Familiy History Review	<u>م</u>	Ч	Ъ	Р	Р	Р	Ч	4	Р	Pr							
(virtual)								212									
Genetics Telephone								53									
Genetics Consultant								630									
Genetics Coursellor								265									
My Medical Record - Message contact								26									
OUTPATIENT - ATTENDANCE SINGLE PROFESSIONAL																	
OUTPATIENT - NON-FACE TO FACE SINGLE																	
PROFESSIONAL																	
MDT MULTI-PROFESSIONAL - CONSULTANT LED																	
PGD NON FACE TO FACE SINGLE PROFESSIONAL																	
OUTPATIENT - ATTENDANCE - SINGLE PROFESSIONAL									332								
OUTPATIENT - NON-FACE TO FACE - SINGLE PROFESSIONAL									249								
Preimplantation genetic diagnosis referrals assessment									332								
Preimplantation genetic diagnosis referrals pre-appt preparation									415								
Lynch Clinical Genetics led MDT									249								
WES/WGS Joint GLH/Clinical MDT									249								
Genomic Tumour Assessment MDT									249								
Additional Relative - Clinical Advice									83								