



Pricing Consultation
Department of Health
Room 229
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Pricing consultation response

We welcome the opportunity to comment on the proposals contained within the Department of Health's consultation on 'Fair and Transparent Pricing for NHS Services'.

Help the Hospices is the national charity advocating for and supporting over 200 local hospices across the UK. Our members provide care to over 200,000 people each year, the majority of which is provided in people's own homes.

While we broadly support the creation of an additional objection mechanism to the pricing methodology engagement processes we have concerns about the failure to join up work with other components of the new NHS architecture. In particular, we would encourage the proposals to be developed in line with the Fair Playing Field Review which is being led by Monitor.

At present, it is difficult for the hospice movement to comment on the pricing of tariffs as a result of the way in which the NHS currently contributes towards the costs of hospice care. In most local health economies, the NHS is effectively making a contribution towards the costs of the care provided, often without any clearly defined service specifications or volumes attached.

In the future hospices will be covered by a national palliative care funding tariff but charitable hospices are likely to continue spending more on meeting the needs of people approaching the end of life than comparable providers as a result of their very significant charitable contribution which nationally equates to over £620 million each year. The proposals suggest that the share of supply threshold will be

determined only by the tariff income, which means that a charitable hospice will not be weighted in line with the full range of services that they fund and provide. We therefore encourage the Department of Health objection mechanism team and palliative care funding review team to work closely together to embed the alternative of a range of 'share of supply' calculations in the on-going development of a new palliative care funding tariff.

We look forward to hearing the outcome of the consultation in due course, and to working with the Department of Health in taking forward the issues that we have raised.