

Summary of responses to the statutory consultation

We received 353 responses to the statutory consultation on Monitor and NHS England's proposals for the 2016/17 National Tariff Payment System. These were made up of 239 responses to the survey, 24 letters, and 90 comments and questions received by Monitor's Pricing enquiries team.

The breakdown of objections, rounded to the nearest percent, to the proposed method for determining national prices was as follows:

Organisation Type	Objection
Clinical commissioning groups	4 (2%)
NHS providers	14
Other relevant providers	8
Total relevant providers	22 (6%)

Respondents were also asked to give their attitude to the proposals on a scale from strongly support to strongly oppose. The breakdown of responses was as follows:

Proposal	NHS providers (% support/ % oppose)*	Other providers (% support/ % oppose)*	Commissioners (% support/ % oppose)*
Currency design	49%/ 19%	37%/ 0%	77%/ 9%
Method	48%/ 21%	32%/ 37%	77%/ 4%
National Prices	53%/ 17%	42%/ 26%	69%/ 11%
National Variations	48%/ 12%	32%/ 0%	26%/ 48%
Locally Determined Prices	44%/ 21%	37%/ 42%	79%/ 0%

* This does not include respondents that neither oppose nor support the policy.

The main concerns raised were:

- The use of the ETO as the starting point for setting prices. Some feedback stated that this was not an appropriate starting point because it was based on prices from the 2015/16 statutory consultation. The rationale (stability) was explained in our proposals and the team remain satisfied that this is consistent with Monitor and NHS England's objectives for 2016/17.
- While there was general acceptance of the rationale for not implementing HRG4+ in 2016/17, feedback suggested that we should do so in 2017/18 because of the advantages of increased accuracy and the growing distance between the costs used and current clinical practice.

- Comments on some individual prices and currencies. These have been reviewed and in certain cases manual adjustments have been made to correct errors.
- Some confusion over the application of local pricing rules in relation to cost uplifts and the procurement of high cost devices. We have provided greater clarity in the final national tariff document to address these points.
- The continued inclusion of the marginal rate emergency rule particularly as the baseline for the policy is set to 2008/9 activity. We adjusted the rate to reflect the progress made in previous years but do not feel that it is appropriate to remove it at this time.

Annex A shows the changes we have made following the statutory consultation.

Annex B shows the survey responses we received. We asked respondents for permission to publish their names alongside their responses. Where this was not given we have withheld their details.