

Surrey Heartlands CCG and Surrey Heath Place (part of Frimley CCG): - Individual Funding Request (IFR) Service

**IFR Activity Report 2021/22
Quarter 3 (October – December 2021)**

Contents

| | | |
|-----|--|----|
| 1. | Introduction and Overview | 3 |
| 1.1 | Evidence Based Interventions (EBI) Programme | 4 |
| 2. | Population Sizes..... | 5 |
| 2.1 | Surrey Heartlands CCG | 5 |
| 2.2 | Surrey Heath Place (part of Frimley CCG) | 5 |
| 3. | IFR applications screened..... | 5 |
| 4. | IFR applications received by provider | 5 |
| 5. | IFR applications received by procedure | 6 |
| 6. | IFR applications received by organisation..... | 6 |
| 7. | IFR application outcomes..... | 6 |
| 8. | IFR application outcomes by Place | 7 |
| 9. | Attendance Logs | 7 |
| 9.1 | IFR Panel GP Attendance | 7 |
| 9.2 | IFR Panel Non-GP Attendance | 8 |
| 10. | Assisted Conception..... | 8 |
| 11. | European Economic Area Requests by Place..... | 9 |
| 12. | Non-IFR Funding Requests..... | 9 |
| 13. | Appeals (Process Review) Received | 9 |
| 14. | Complaints Received | 10 |
| 15. | Key Performance Indicators (KPI's) | 11 |
| 16. | Next Steps..... | 12 |

1. Introduction and Overview

The Effective Commissioning Initiative (ECI) Team at Surrey Heartlands Clinical Commissioning Group (CCG) hosts the Individual Funding Requests (IFR) Service on behalf of East Surrey, Guildford & Waverley, North West Surrey and Surrey Downs Places, and Surrey Heath Place which forms part of Frimley CCG.

The Surrey-wide clinical intervention policies, which includes the Treatments that are not routinely funded requiring an Individual Funding Application (TNR1), Treatments with restrictions and thresholds (TNR2) and Assisted Conception policies, are developed on the basis of detailed evidence reviews produced by the Public Health Team and considered by the Surrey Priorities Committee (SPC). The SPC comprises of clinical representation from East Surrey, Guildford and Waverley, North West Surrey, and Surrey Downs Places, and Surrey Heath Place, and makes recommendations on the appropriateness of commissioning of healthcare interventions (e.g., specific treatments, procedures, and care pathways), using the agreed Ethical Framework and considering clinical views.

The SPC will make recommendations, based on the available evidence presented on clinical effectiveness, to the Health & Care Professionals Executive (HCPE) for agreement and ratification prior to publication within the relevant clinical policy. The HCPE sits at system level with representation across all partners and professional groups; the membership is driven by Places, as well as partnership organisations, to ensure robust diversity and holistic representation of views across the system. The HCPE is fully inclusive and reflects the broad range of professions that need to work together through the Integrated Care Board (ICB), the Integrated Care Partnership (ICP) and across Places, provider collaboratives and partners in Primary Care Networks (including General Practice and other primary care and community service partners).

Where there are individual cases whereby a patient's needs cannot be met through existing contractual or commissioning arrangements, and a consultant considers that their patient has an exceptional clinical need for an uncommissioned treatment and wishes to request funding, they have the option of submitting an Individual Funding Request (IFR). When these requests occur, CCGs must have a robust and transparent system in place to assess and determine whether the request should be funded, demonstrating a rational decision-making process for an individual patient.

IFR applications, for procedures and treatments which are not routinely funded on the NHS, are submitted to the ECI Team through an online database called Blueteq. Each application is checked for completeness by the ECI Team, and subsequently screened for eligibility for consideration by the IFR Panel on a weekly basis by the IFR Screening Group. The IFR Screening Group consists of a minimum of 2 clinicians to guarantee a fair and transparent process. IFR applications can be submitted for both interventions and drugs; any received for drugs are processed by the Pharmaceutical Commissioning Team and are not included within this report.

IFR applications that are deemed to be eligible for consideration by the IFR Panel are processed and submitted to the next available Panel meeting for clinical discussion. Panel meetings are held on the fourth Wednesday of every month and are attended by clinical representation from each of the 4 Surrey Places, 1 from Surrey Heath Place as well as a pharmacist, a member of the Public Health Team, and a Lay Member. The IFR Panel will decide whether to approve or decline funding.

Following the Panel decision, the ECI Team will communicate the outcome to the applicant. If the applicant wishes to request a review of the Panel outcome following a decision to decline funding, they can do so by contacting the ECI Team within one calendar month of the date of the IFR Panel decision email/letter. Review Panel meetings are organised on an ad-hoc basis; each Place is represented by alternative clinical member to the original Panel.

This report demonstrates the scope of IFR applications which have been received (for interventions only) by the ECI Team over the last quarter.

The data within this report relates to all 4 Surrey Places within Surrey Heartlands CCG: East Surrey, Guildford & Waverley, North West Surrey, and Surrey Downs, and Surrey Heath Place.

In March 2020, NHS England issued guidance that all providers be on a block contract in order to minimise the burden of formal contractual documentation and contract management processes so that staff can focus fully on the COVID-19 response. The block contract arrangement continues to be in place.

1.1 Evidence Based Interventions (EBI) Programme

The Evidence Based Interventions (EBI) programme was initiated by NHS England/Improvement in 2018 and aims to reduce harm and unnecessary interventions taking place by ensuring that those that are routinely available on the NHS are evidence-based and appropriate.

In addition, the programme aims to avoid needless harm to patients and free up scarce professional time for performing other interventions, including creating headroom for proven innovations. The time saved can, in turn, be reinvested into patient care.

NHSE/I compiled an initial list of 17 interventions, known as Wave 1, that had either no or limited clinical effectiveness based on clinical evidence and research including NICE guidelines, Choosing Wisely recommendations and academic studies which formed part of the NHS Standard Acute Contract.

Of the 17 interventions in Wave 1, 4 were categorised as requiring an IFR: Intervention for snoring (not OSA), Dilation and Curettage for heavy menstrual bleeding, Knee Arthroscopy for Osteoarthritis, and Injections for non-specific low back pain without sciatica.

In December 2020, a further 31 interventions/tests/procedures were introduced, known as Wave 2, 2 of which were categorised as requiring an IFR: Exercise ECG for screening for coronary heart disease and Helmet Therapy for treatment of positional plagiocephaly/brachycephaly in children.

Current standard contracts stipulate the requirement to comply with the EBI guidance. Although the guidance is not mandatory, CCG activity is monitored on a monthly basis by NHSE/I. A dashboard is used to present the data for all interventions across the country and can be used to identify providers/commissioners that are outliers against each intervention/test/procedure. The dashboard is accessible via ViewPoint which provides an interactive view of EBI activity across England, down to provider level.

Wave 3 of the EBI Programme is currently in the developmental stages.

2. Population Sizes

2.1 Surrey Heartlands CCG

Surrey Heartlands CCG was formed on 1st April 2020 following the merger of 4 CCGs from across Surrey (East Surrey, Guildford & Waverley, North West Surrey, and Surrey Downs CCGs). The CCG has a population size of around 1.1 million people, which equates to around 90% of the total population of Surrey, with 104 GP practices working together across the 4 local areas.

2.2 Surrey Heath Place (part of Frimley CCG)

Surrey Heath Place forms part of Frimley CCG and covers a population of 95,000 people who are registered with GPs in Ash Vale, Bagshot, Camberley, and Frimley.

3. IFR applications screened

All complete IFR applications are screened for eligibility for consideration by the IFR Panel. Where applications have been withdrawn, they are considered to be incomplete, and the applicant is advised that they can resubmit at any time.

| Month | No of IFR's screened | Eligible for Panel | Ineligible for Panel | Further information required |
|-------|----------------------|--------------------|----------------------|------------------------------|
| Oct | 0 | 0 | 0 | 0 |
| Nov | 1 | 1 | 0 | 0 |
| Dec | 2 | 0 | 2 | 0 |

4. IFR applications received by provider

During the same time period for the previous year, 2020/21, there has been just over a 41% decrease, equating to 5 IFR applications less in comparison.

| Provider | Activity |
|--|----------|
| Airedale NHS Trust | 1 |
| Ashford & St Peters Hospitals NHS Foundation Trust | 1 |
| Queen Victoria Hospital NHS Foundation Trust | 2 |
| Spire Thames Valley Hospital & Windsor Clinic | 2 |
| Surrey & Sussex Healthcare NHS Trust | 1 |
| Grand Total | 7 |

5. IFR applications received by procedure

The table below shows the procedures for which IFRs were submitted during Quarter 3.

| Procedure | Activity |
|-------------------------|----------|
| Abdominoplasty | 1 |
| Apronectomy | 1 |
| Brow Lift | 1 |
| Foot & Ankle Procedure | 1 |
| Hip & Knee replacements | 1 |
| Labiaplasty | 1 |
| Septorhinoplasty | 1 |
| Grand Total | 7 |

6. IFR applications received by organisation

The table below shows the number of IFR applications received for each of the 4 Surrey Heartlands Places, and Surrey Heath Place during Quarter 3.

| Organisation | Activity |
|----------------------------|----------|
| East Surrey Place | 2 |
| Guildford & Waverley Place | 1 |
| North West Surrey Place | 1 |
| Surrey Downs Place | 1 |
| Surrey Heath Place | 2 |
| Grand Total | 7 |

7. IFR application outcomes

Very few applications have been received during this period; of the 7 that were received, 5 were withdrawn; the common themes being:

- There is a policy therefore an IFR application is not required, e.g., a procedure that is funded where it can be demonstrated that a patient meets the criteria.

- Insufficient clinical detail was provided, or the request was uploaded onto the Blueteq database but not fully submitted, i.e., an application remains incomplete despite numerous attempts by the ECI Team to obtain the omitted information from the requesting clinician. If no response is received, the application is withdrawn.

| Status | Activity |
|--|----------|
| IFR: Withdrawn | 5 |
| IFR; Ineligible for consideration by the IFR Panel | 1 |
| IFR; Further information requested | 1 |
| Grand Total | 7 |

8. IFR application outcomes by Place

The table below shows the outcomes for all the IFR applications that were submitted during this quarter. Where cases are incomplete, no costs are available.

| | IFR Outcome | Activity | Anticipated Cost |
|---|--|----------|------------------|
| East Surrey Place | | | |
| | IFR; Ineligible for consideration by the IFR Panel | 1 | £10,000 |
| | IFR; Further information requested | 1 | £5,000 |
| Guildford & Waverley Place | | | |
| | IFR: Withdrawn | 1 | £0 |
| North West Surrey Place | | | |
| | IFR: Withdrawn | 1 | £0 |
| Surrey Downs Place | | | |
| | IFR: Withdrawn | 1 | £0 |
| Surrey Heath Place (part of Frimley CCG) | | | |
| | IFR: Withdrawn | 2 | £0 |
| Grand Total | | 7 | £15,000 |

9. Attendance Logs

The October and November IFR Panel meetings held were to consider intervention cases only, and the Panel held in December was to consider a drug request only.

9.1 IFR Panel GP Attendance

The table below shows the attendance log for the GPs that were present at each IFR Panel meeting during this quarter.

| Name | Organisation | Oct | Nov | Dec |
|-------------------|-------------------|---|---|---|
| Dr Bethan Forgie | East Surrey Place |  |  |  |
| Dr Joe McGilligan | East Surrey Place |  | |  |

| Name | Organisation | Oct | Nov | Dec |
|----------------------|----------------------------|---|---|---|
| Dr Dan Grimstead | East Surrey Place | | |  |
| Dr David Eyre-Brook | Guildford & Waverley Place |  |  |  |
| Dr Philippa Woodward | North West Surrey Place |  |  |  |
| Dr Phi Vo | Surrey Downs Place |  | | |
| Dr Ruchika Gupta | Surrey Downs Place | |  | |
| Dr John Fraser | Surrey Heath Place |  |  |  |

9.2 IFR Panel Non-GP Attendance

The table below shows the attendance log for the non-GPs that were present at the IFR Panel meetings during this time period.

| Name | Organisation/Role | Oct | Nov | Dec |
|-----------------------|--|---|---|---|
| Dr Iain Cruickshank | Independent Clinical Chair |  |  | |
| Dr Elizabeth Saunders | Public Health, Surrey County Council | |  |  |
| Tejinder Bahra | Medicines Management Team, Surrey Heartlands CCG |  |  |  |
| Paul Barton | Lay Member |  |  |  |
| Andrea Golding | ECI Team, Surrey Heartlands CCG | |  | |
| Taylor Keech | ECI Team, Surrey Heartlands CCG |  |  |  |
| Clare Johns | Medicines Management Team, Surrey Heartlands CCG | | |  |
| Georgina Randall | Medicines Management Team, Surrey Heartlands CCG | | |  |
| Peter Dawson | Public Health, Surrey County Council |  | | |

10. Assisted Conception

Under patient choice, patients who are registered with a Surrey Heartlands CCG or Surrey Heath Place GP have the option of choosing where to undergo their Assisted Conception treatment, although there are 3 preferred providers that are commissioned. These providers are Care Fertility (previously Nuffield Health, Woking Hospital), Croydon Health Services NHS Trust (Mayday) and Kingston Hospital NHS Foundation Trust.

Up to 2 full cycles (consisting of 1 fresh and 1 frozen cycle) of IVF, with or without ICSI, are funded in eligible women who are aged no more than 39 years at the time of their referral to a fertility clinic.

If the woman reaches the age of 40 during treatment, then that cycle can be completed but no others must be initiated.

No IFR applications were received for Assisted Conception procedures between October and December 2021.

11. European Economic Area Requests by Place

European Economic Area (EEA) requests are for routine treatments which took place in a European country. Places are responsible for reimbursing patients if the treatment would have been routinely available on the NHS. All EEA requests are managed by NHS England. When treatment takes place via this route, the designated team at NHS England submit a request for reimbursement of costs to the patients Place.

All EEA requests are managed by the ECI Team; each request is logged by the team and the patients Place makes the decision on whether the reimbursement should be made.

Requests received from NHS England contain minimal information and do not include the costs involved in the treatment. If a response is not submitted to NHS England within 7 working days, they have the authorisation to approved funding on behalf of the patients Place providing the treatment undertaken is funding locally. NHS England will then recharge the appropriate Place.

No EEA reimbursement claims were made during this period.

12. Non-IFR Funding Requests

Applications that are submitted for treatments/procedures/equipment that does not fall under the remit of IFR but still require funding via Surrey Heartlands CCG/Surrey Heath Place, are processed via an Outside Remit Request (ORR). The ECI Team log the request details onto a central document and then send the completed, anonymised ORR form to the relevant contracting team for a response.

During this period, 1 request was submitted to the ECI Team for a Surrey Downs Place patient diagnosed with Incomplete Tetraplegic who required a Granstand Standing Frame at a cost of £6748. The request was reviewed and subsequently approved.

13. Appeals (Process Review) Received

When the IFR Panel has not supported a funding request for a treatment, the patient or requesting clinician have the option of requesting that the process which led to the decision be subject to review. The request must be submitted to the ECI Team within 28 working days of the IFR Panel outcome and submitted in writing via email.

The IFR Review Panel will consider whether the process followed by the IFR Panel was fair and consistent, based on whether the decision reached:

- Was taken following a process which was consistent with the policies of CCG;
- Was a decision which a reasonable IFR Panel was entitled to reach;
- Understood, took into account and weighed, all the relevant evidence; and
- Did not take into account any irrelevant factors.

In the event that the IFR Review Panel considers that there was any procedural error in the IFR Panel's decision, they will consider whether there was any reasonable prospect that the IFR Panel could have come to a different decision had that error not been made.

If the IFR Review Panel considers that there was no reasonable prospect of the IFR Panel coming to a different decision, then the IFR Review Panel will approve the decision notwithstanding the procedural error. If the IFR Review Panel considers that there was a reasonable prospect that the IFR Panel may have come to a different decision had the error not been made, the IFR Review Panel will require the IFR Panel to reconsider the decision. New information provided cannot be taken into consideration.

No review requests were received between October and December 2021.

14. Complaints Received

Complaints that relate to the IFR process are submitted directly to the Surrey Heartlands CCG complaints team who will, in turn, contact the ECI Team for a response to be drafted.

| Organisation | Details of complaint | Outcome |
|-------------------------|--|--|
| East Surrey Place | Refashioning of scar: Patient's mother unhappy with IFR outcome | Patient's mother advised that if the consultant is able to provide further details of clinical exceptionality, a new IFR can be submitted for consideration. To date, no new application has been received from the consultant. Case closed. |
| North West Surrey Place | Refashioning of scar: Patient unhappy with IFR outcome | Patient's consultant feels that surgery will not improve the visual aspects of the scar and could potentially make it worse. The decision to decline funding remains. Case closed. |

| Organisation | Details of complaint | Outcome |
|-------------------------|---|---|
| North West Surrey Place | Assisted Conception: Patient had ongoing complaints with her provider and queried the rationale for the age and BMI thresholds. | Patient had ongoing complaints with the hospital. An IFR was declined by the Panel as her clinical presentation was not exceptional. The patient provided new information that was not provided to us by the applicant therefore the consultant was advised that they could submit a new application; to date, no new application has been received. The patient continues to be in regular contact with the Complaints Team around this matter, therefore this complaint remains open. |

15. Key Performance Indicators (KPI's)

The ECI Team work to Key Performance Indicators (KPI's) in order to ensure that the IFR process is managed in a robust manner. The table below shows the details of each KPI and whether the target was met each month.

| KPI | Target | Oct | Nov | Dec |
|---|--------|------|------|------|
| IFR applications reviewed within 5 working days of receipt | 100% | 100% | 100% | 100% |
| Response sent to requesting clinicians within 5 working days when applications submitted incomplete | 100% | 100% | 100% | 100% |
| Applications received which are outside of the remit of the ECI Team, returned to the requesting clinician within 5 working days | 100% | 100% | 100% | 100% |
| IFR application outcome communicated to requesting clinician within 35 working days (from the date completed information is received) | 100% | 100% | 100% | 100% |
| Urgent requests receive a decision within 3 working days of receipt | 100% | 100% | 100% | 100% |

16. Next Steps

- All providers (both NHS and Independent) will continue to be on a block contract, likely until 2022/23.
- The ECI Team will continue to be part of the demonstrator community for the Evidence Based Interventions (EBI) lead by NHS England. The team will contribute to the 3rd Wave of thresholds which will be implemented in due course following consultation and launch events.
- The procedures within the Treatments Not Routinely funded (TNRf1) policy will continue to be reviewed on a 5-year cycle.
- Surrey Heath Place have given notice to withdraw from utilising the IFR service. Conversations are ongoing around the final date.