Jonathan Rowell
Director of Specialised Commissioning Finance - NHS England
Wellington House
133-155 Waterloo Road
London SE1 8UG

Wednesday 4th January 2023

Re: Proposed Amendments to CAR-T Therapies Tariff

Dear Jonathan,

We would like to comment on your letter dated 7th October 2022 in which you indicated NHS England's intention to change the approach to payment for Chimeric Antigen Receptor T-cell (CAR-T) therapy services for the 2023/24 financial year. Your letter indicates that you wish to explore options for replacing the existing 'per patient' approach with an underlying infrastructure payment, supplemented by a smaller 'per patient' tariff to more accurately reflect the marginal costs associated with a more established service.

Whilst we appreciate the need to review tariffs in the light of changes in national service provision including, as you have indicated, an increased number of providers and increases in experience we do have significant concerns:

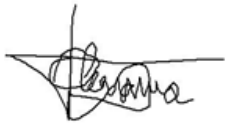
Delivery of CAR T cell therapies within the NHS provide a curative therapeutic avenue for advanced lymphoid malignancies and leukaemia where patients were none previously existed. These are complex therapeutics to deliver with need of specialist infrastructure and staff, often to patients with complex medical needs. There is a significant risk of severe toxicity, which is best handled in specialist centres, recognised by the service specifications set by NHSE.

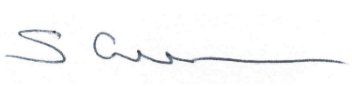
We welcome the need for appraisal of tariffs to ensure that NHS trusts are reimbursed for the activity required to deliver these novel therapies, but ask that such an appraisal is done with data on the costs of delivery across all licensed disease indications and delivery models. The existing tariff was based on a detailed costing exercise that a number of providers took part in 2018. NHS trusts are collating these data currently and we hope NHSE will agree to review the CART tariff in this context. This will ensure that we can continue to deliver these therapeutics with the best possible patient outcomes.

We are concerned that amending the tariff in April 2023 will not give affected providers enough notice to be able to factor these changes into their 2023/24 business planning rounds. This could potentially result in capacity being constrained at a time when commissioners have indicated a desire to expand the indications for which CAR-T.

We appreciate that, given the current climate, commissioners need to make difficult decisions. However, we would suggest to allow a 3-6 month timeframe to complete the new detailed costing exercise and that any changes be implemented from 1 April 2024.

Yours Sincerely





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