

NHSCB28027

BOARD PAPER - NHS COMMISSIONING BOARD

Title: Pricing governance

Clearance: Bill McCarthy, National Director: Policy

Purpose of Paper:

- To review and agree arrangements which have been developed jointly with Monitor for governance around pricing and to agree some delegation of authority to a new Joint Pricing Executive

Key Issues and Recommendations:

- Under the Health and Social Care Act 2012, responsibility for pricing most NHS services, other than primary care, will rest jointly with Monitor and the NHS Commissioning Board (NHS CB). The Act places lead responsibility for various stages of pricing with either NHS CB or Monitor but at each stage the organisations are expected to agree proposals with each other. In order to make this system work we need to have governance arrangements that are flexible and can respond quickly to the needs of either organisation.

- Both organisations have worked together to propose a joint governance structure set out in the attached paper. The paper suggests that although, especially in the early years of the new system, both main Boards are expected to want to retain some direct oversight of pricing, in order to be sufficiently flexible, a certain amount of authority is delegated to a new Joint Pricing Executive. Exact details of the suggested level of delegated authority is set out in annex C of the paper.

Actions Required by Board Members:

- The Board is asked to agree to the recommended joint governance arrangements, including Terms of Reference for the new Joint Pricing Executive, and
- to the suggested delegation of authority to the new Joint Pricing Executive

Executive Summary

1. The Health and Social Care Act 2012 splits responsibility for designing a National tariff and calculating prices between the NHS Commissioning Board (NHS CB) and Monitor. The Act requires each new organisation to take responsibility for certain stages of the process, but at the same time sets out that progress cannot be made by one organisation without explicit agreement of the other.
2. A corporate Partnership Agreement is being developed by NHS CB and Monitor and reflects the need for both organisations to work collaboratively together. This Partnership Agreement will be supported by functional strategic agreements, one of which will cover pricing and will be known as the “Pricing Joint Operating Model”. Because of the tight timetable in delivering the 2014/15 National Tariff, there is now a need to agree joint governance arrangements that are flexible and responsive to each organisations responsibilities on pricing.
3. This paper highlights the joint working undertaken to date to develop proposals for a joint governance structure. This has considered the roles and responsibilities of each organisation, including the implications of these on the types and frequency of pricing decisions that will need to be made.
4. As a result, this paper proposes a joint governance structure between NHS CB and Monitor. This consists of a Joint Pricing Executive, (a group of NHS CB and Monitor Executive Directors, meeting periodically) which would have delegated authority to make all decisions on pricing, except in a small number of cases whereby decisions would be retained by the individual Boards working in parallel.
5. The paper outlines proposed terms of reference for the Joint Pricing Executive and also for a Joint Pricing Development & Tariff Delivery group, which would act as a project board for the delivery of the National Tariff.
6. This paper has been jointly produced with Monitor and has been shared with colleagues across the NHS CB via the newly formed NHS CB pricing network.
The same paper is being presented to both the NHS Commissioning Board and to the Monitor Board.
7. The Board is asked to:
 - Agree to the proposed terms of reference for the Joint Pricing Executive;
 - Agree to those joint pricing decisions which are reserved for Monitor and NHS CB Boards and those joint pricing decisions to be delegated to the Joint Pricing Executive and
 - Confirm and approve the next steps.

Pricing Governance

Background

1. A corporate Partnership Agreement is being prepared jointly by NHS CB and Monitor which reflects the two organisations' need to collaborate to deliver a number of shared strategic objectives and fulfill their duty to co-operate under section 290 of the Health & Social Care Act 2012 (H&SC Act 2012). This Partnership Agreement will be supported by functional strategic collaborative agreements, one of which cover pricing and payment systems and is known as the Pricing Joint Operating Model (PJOM). The PJOM is under development and will include sections on joint governance in line with decisions of the two Boards following their consideration of this paper.
2. The H&SC Act 2012 splits responsibility for designing a National Tariff and calculating prices between the NHS CB and Monitor. Currently, both functions are carried out by a single team in the Department of Health (DH). The Act requires each new organisation to take responsibility for certain stages of the process but, at the same time, sets out that progress cannot be made by one organisation without the explicit agreement of the other.
3. The Act also introduces formal public consultation on the National Tariff Document (i.e. the methodology used to calculate prices, the prices and associated rules and guidance) for the following year and provides for a reference to the Competition Commission if the percentage objections from the sector to the methodology adopted for calculating prices are above a prescribed figure.
4. Collectively these new responsibilities and additional stages place pressure on the tariff production timetable, which was already fairly tight due to the need to adopt the latest possible data inputs. As a result, NHS CB and Monitor need to agree a governance structure that will facilitate close working arrangements, provide sufficient flexibility and responsiveness so that problems can be resolved quickly, whilst delivering the National Tariff Document within the required timescales.
5. This paper has been written as a result of a joint NHS CB and Monitor working group and the outputs from a joint NHS CB and Monitor Director and senior management level workshop in December 2012. In addition, the work to date on governance reflects the lessons learnt from current DH arrangements.

6. This paper covers:
- a summary of the respective pricing roles and responsibilities of the NHS CB and Monitor;
 - the implications of these roles and responsibilities on the timing, numbers and types of decisions that will require governance arrangements;
 - a brief description of the governance options considered;
 - the recommendations for governance for decision by the NHS CB and Monitor Boards; and
 - next steps, including implementation activities, responsibilities and timescales.

Summary of NHS CB and Monitor respective pricing roles and responsibilities

7. Chapter 4 of the H&SC Act 2012 defines the respective pricing roles and responsibilities of Monitor and NHS CB.
8. The Act effectively splits the responsibility that the DH Payment by Results (PbR) function had, (under the Secretary of State for Health), for determination of currencies for NHS services and determination of their associated prices, between NHS CB and Monitor. In the Act, each organisation has a defined accountability for leading on different aspects of pricing and in addition for some activities a requirement to agree the output with the other organisation before implementation in the sector.
9. The respective roles and responsibilities as defined in the sections of chapter 4 of the Act are summarised in Appendix 1.
10. In summary NHS CB are the lead body with accountability for the definition and variation to the scope and content of services or currencies. Monitor is the lead body with accountability for the determination of prices for these currencies, development of rules and guidance and publication of the National Tariff Document. However, to deliver these responsibilities the two organisations effectively need to work closely together.

Implications of the pricing roles and responsibilities on the timing, number and types of decisions that will require governance

11. In line with its responsibilities, Monitor plans to publish the first National Tariff Document in February 2014. To meet this requirement a number of key decisions

will need to be made from early 2013 onwards. Therefore enduring governance arrangements will need to be in place for March 2013.

12. Analysis of the pricing roles and responsibilities shows that 24 recurring and 4 one off decisions will need to be made (see Appendix 3 for detailed list of decisions). These highest level decisions cover three broad categories:
 - Strategy: for example, long term pricing and payments vision/direction of travel, costing strategy.
 - Policy: for example, currency specification, tariff methodology, local modifications.
 - Production of the National Tariff Document: for example, rules, guidance and consultation gateway.
13. The ability to design pricing systems and set prices will be one of the key levers available to Monitor and the NHS CB to help them discharge their wider functions under the H&SC Act 2012. As such we would expect the both Monitor and NHS CB Board would wish to retain oversight of the long term pricing strategy and, especially in the early days, some of the key decisions which will need to be taken annually. It will be vital however that the governance arrangements provide a tier of decision making which is not only more flexible than the main NHS CB and Monitor Boards but which allows for a more detailed consideration of some technical issues. These decisions can be interpreted as those that are made jointly between the two organisations and those that are made alone and also be further sub divided into those where the two organisations either work together or solely prior to making a joint or solo decision. Appendix 2 describes the different ways in which NHS CB and Monitor will work together in making pricing decisions.
14. Finally any agreed governance arrangement will need to link across to the Shared Financial Planning Agreement (SFPA). This is a coalition of organisations with an interest in the overall financial position of the healthcare economy and who naturally have an eye on levels of tariff and required efficiency savings.
15. In summary, a form of joint governance arrangements are needed to facilitate decisions, which:
 - recognises the Act's requirement for Monitor and NHS CB to co-operate with each other in the exercise of their respective functions;
 - reflects which decisions could be delegated to a joint governance body and those which should be retained by Monitor and NHS CB Boards and the timings of these; and

- is flexible and nimble enough to reflect the dynamic and iterative nature of tariff development.

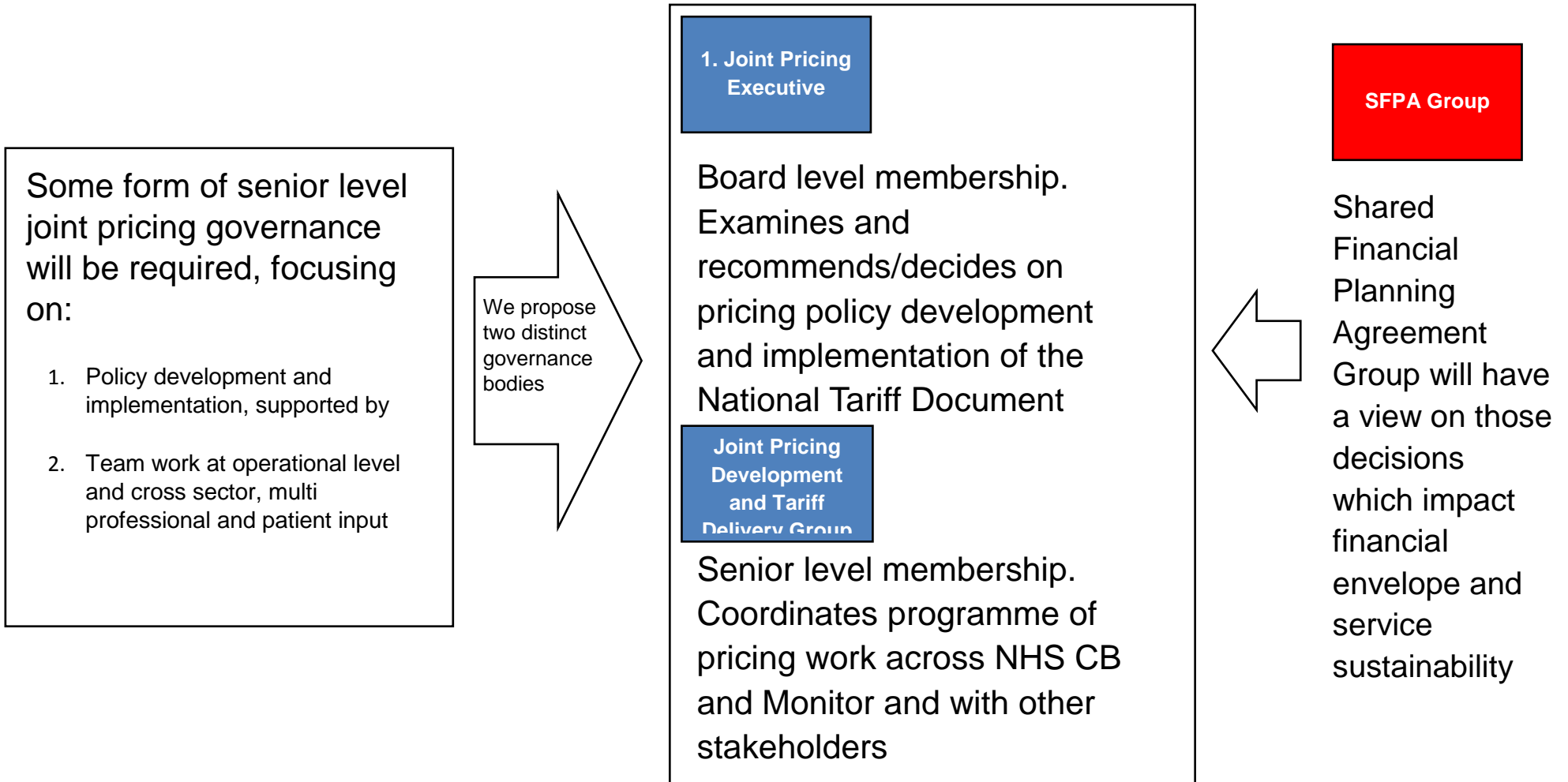
Options for joint pricing governance

16. There are three broad options for joint governance:
 - Option 1: All joint decision making is retained by the NHS CB and Monitor Boards on recommendation from a joint body with representation at Board level (the Joint Pricing Executive (JPE));
 - Option 2: All joint decision making is delegated to a JPE; or
 - Option 3: Boards delegate some joint decisions to the JPE and retain others.
17. Each option reflects the balance in nuance of the Act's separate accountability but requirement to co-operate. Furthermore the use of a JPE and sub levels (described in the next section) mitigates risk of surprises and/or failure to agree. The only significant disadvantage of option 1 and 3 over option 2 is that the time taken for all decisions under option 1 and some decisions on option 3 is increased. However this can be mitigated with forward planning.
18. In addition, as the pricing roles and responsibilities are new to NHS CB and Monitor it is recognised that the Boards will wish to retain decision making authority for at least some of the pricing decisions until new ways of working are tested and bedded in. Option 3 is therefore the preferred option as it best allows for different decision making process for different types of decisions with the flexibility to review and adapt with experience.

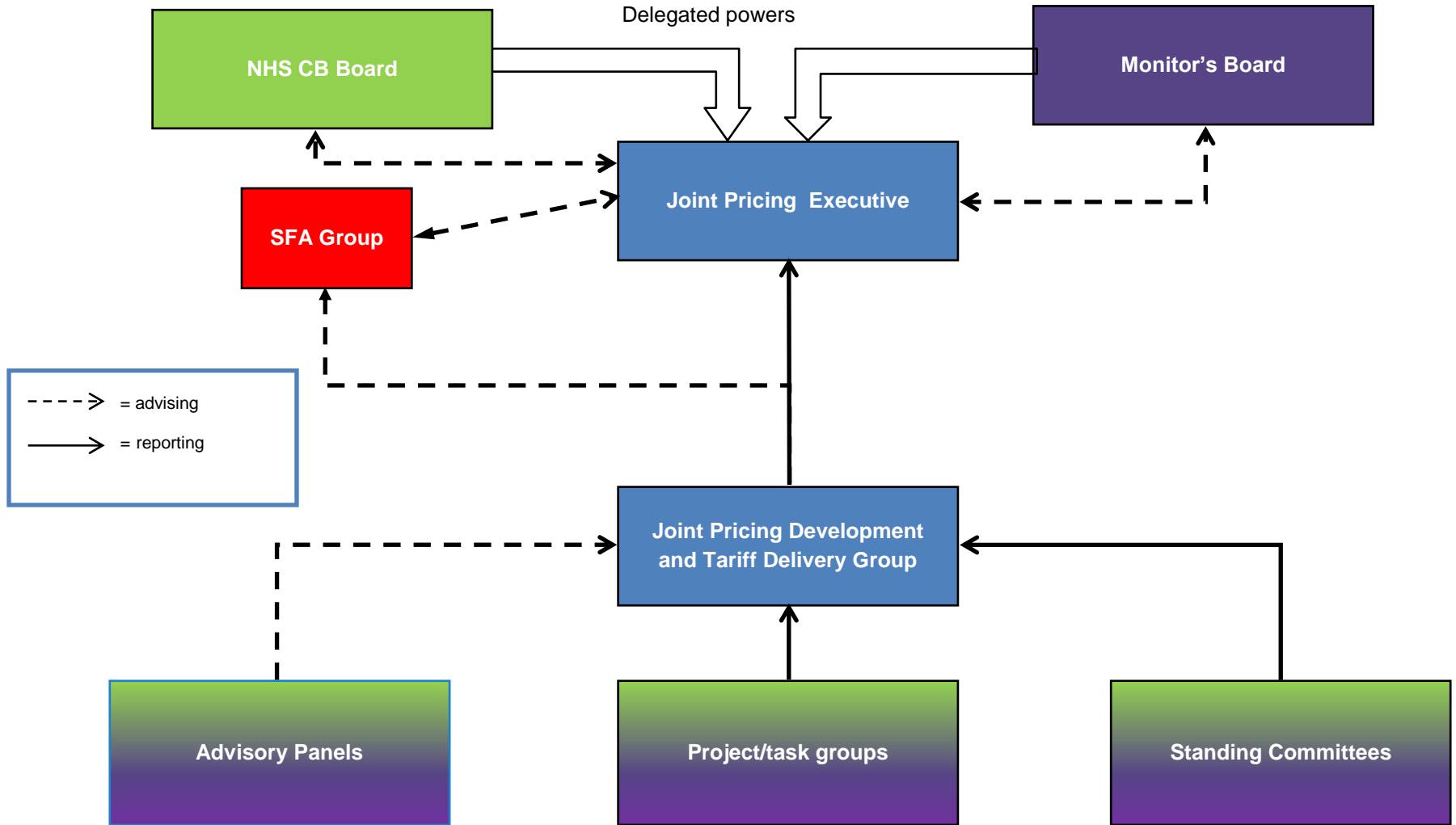
Pricing Governance recommendations and terms of reference of governance bodies

19. We recommend that the JPE is supported by a Joint Pricing Development and Tariff Delivery Group. This Group will have representation at sub Board level and will include contributions from organisations such as the NHS Information Centre. It will also act as a project board for tariff delivery ensuring that the work programme is sufficiently resourced and delivered on time. The diagrams below describe the responsibilities and schematic for the two proposed pricing governance bodies and their relationship to the existing SFPA:

Responsibilities and schematic for the two proposed pricing governance bodies and their relationship to the existing SFPA



Proposed Joint Pricing Governance



20. The proposed terms of reference for the JPE are:
- Take key decisions delegated by the NHS CB and Monitor Boards on outputs from the programme of pricing work required to develop, agree and publish the National Tariff Document
 - To make recommendations reserved for the NHS CB and Monitor Boards on outputs from the programme of pricing work required to develop, agree and publish the National Tariff Document
 - To determine the role and membership of the Joint Pricing Development and Tariff Delivery Group
 - To approve an annual joint work plan to include the cycle for the production of the National Tariff Document and research, development and evaluation programmes
 - To receive reports and assure delivery of the work from the Joint Pricing Development and Tariff Delivery Group
 - To receive views from and liaise with the Shared Finance Planning Agreement on the implications of the National Tariff on overall Departmental Expenditure Limit
 - To deliver its responsibilities in line with the principles agreed between the NHS CB and Monitor, the Secretary of State's mandate for the NHS and respective roles and responsibilities of the NHS CB and Monitor.
21. The suggested membership for the JPE is:
- For Monitor –Director of Sector Development, Director of Clinical and Patient Engagement and Director of Pricing.
 - For the NHS CB - Chief Financial Officer, National Medical Director, National Director Policy .
22. It is recommended that Chair rotates between each organisation with quorum of 2 from each organisation with named alternates to carry the same decision making authority.
23. Appendix 3 lists and recommends for each of the 24 recurring and 4 one off pricing decisions which the JPE will either recommend to the Boards for approval or are delegated to it for decision.
24. The proposed terms of reference for the Joint Pricing Development and Tariff Delivery Group are;

- to recommend for approval by the Joint Pricing Executive a plan for the creation, impact assessment, stakeholder engagement, statutory consultation and publication of the National Tariff document;
- to acts as the Programme Board for the delivery of the National Tariff document
- to make key evidence based recommendations on an annual joint work plan covering the cycle for the production of the National Tariff Document and research, development and evaluation programmes
- to agree, manage and assure the results from the programme of work and recommendations for decision for the Joint Pricing Executive
- to assess the impact and determine implications of wider potential/planned policy changes in pricing
- to determine and agree the range of stakeholder groups and organisations to engage in the delivery of its responsibilities (the number, role, membership) and assure the outputs of pricing Advisory Groups, Standing Committees and Project/task based teams
- to identify, evaluate lessons learnt from the use of the National Tariff and recommendations for future development

25. The suggested membership for the Joint Pricing Development and Tariff Delivery Group is:

- For Monitor - 4 to include e.g.: Director Pricing, Head of Tariff Calculation, Head of Pricing Development, Head of Enforcement and Case Management
- NHS CB – 4 to include e.g.: Director of System Policy, Director of Strategic Finance and Clinical Office holders

26. It is recommended that Chair rotates between each organisation with quorum of 2 from each organisation with named alternates to carry the same decision making authority. In addition, this group will be advised by Information Centre and Chair of Clinical and other expert advisory groups and by DH PbR team during the period in which it acts as the agents of NHS CB and Monitor.

Scheme of delegation

27. In order for the governance arrangements to work the Boards of Monitor and NHSCB need to delegate some authority for decision making to the JPE. We are not recommending any further delegation. All decisions will need to be approved by either the JPE or, in a small number of cases; will be reserved to the main boards. In the first instance we are suggesting that the Boards retain responsibility for longer term strategy and the public release of annual tariff information. In addition the

Monitor Board would retain decisions relating to referral to the Competition Commission. We are also suggesting that, for the first year, the Boards would want to approve the shape and structure of the annual tariff.

28. The Boards are invited to formally delegate all other operational tariff decisions to the JPE. These will include issues such as agreeing the work programme, costing development and all operational decisions involved in working up the tariff proposal. A full list of all the decisions and suggested delegation is included in Appendix 3.

Next steps

29. The recommended next steps, responsibilities and timescales are set out in the table below:

| Next step | Responsibility | Timescale |
|---|--|-----------|
| Agree proposed pricing enduring governance arrangements as set out in this document <ul style="list-style-type: none"> • Overall structure • Terms of reference of the JPE • Levels of delegated decision making (appendix 3) • Types of decision making (appendix 2) | NHS CB and Monitor Boards | Feb 2013 |
| Create and set up schedule and content for meetings and secretariat for JPE and Joint Pricing Development and Tariff Delivery Group in relation to cycle of Monitor and NHS CB Boards | NHS CB and Monitor pricing teams with Board secretariats | Feb 2013 |
| Brief and induct JPE and Joint Pricing Development and Tariff Delivery Group on roles and nature and types of decisions | NHS CB and Monitor pricing teams | Mar 2013 |
| Commence governance arrangements | NHS CB and Monitor pricing teams | Mar 2013 |
| Agree assurance and evaluation process for new joint governance arrangements | NHS CB and Monitor pricing teams | May 2013 |
| Review, agree and implement changes needed in governance groups in support of the work of the Joint Pricing and Tariff Delivery Group | NHS CB and Monitor pricing teams | Nov 2013 |

Recommendations

30. The Board is asked to:
- Agree to the proposed terms of reference for the Joint Pricing Executive;

- Agree to those joint pricing decisions which are reserved for the Monitor and NHS CB Boards and those joint pricing decisions to be delegated to the Joint Pricing Executive and
- Confirm and approve the next steps.

Bill McCarthy
National Director: Policy
February 2013

Appendix 1: Summary of NHS CB and Monitor respective roles and responsibilities in pricing

| Section | Activity | Lead accountability allocated to: | Agreement required before execution : |
|---------------|---|-----------------------------------|---|
| 118(7) | Specification of services in National Tariff | NHSCB | Monitor |
| 118(8) | Specification of pricing method, and method for calculating local modifications, in National Tariff | Monitor | NHSCB |
| 118(9) | Specification of prices in National Tariff | Monitor | NHSCB |
| 118(10) | Specification of variations to prices by reference to circumstances or factors relevant to service provision | Monitor | NHSCB |
| 118(11) | Specification of rules for commissioner and provider variations to service specification or national price | NHSCB | Monitor |
| 118(12) | Specification of rules for determining the price payable for services not specified in the National Tariff | Monitor | NHSCB |
| 118(1) | Consultation on proposed National Tariff | Monitor | N/A |
| 120 | Responses to consultation: calculation of objection or share of supply percentage and reference to the Competition Commission | Monitor | N/A |
| 122 | Changes following determination on reference to Competition Commission | Monitor | Monitor must notify NHSCB (no power of veto) |
| 116(1) & (13) | Publishing the National Tariff | Monitor | N/A but NHSCB must have specified or agreed all the main components |

| Section | Activity | Lead accountability allocated to: | Agreement required before execution : |
|-----------|--|-----------------------------------|---------------------------------------|
| | | | as above |
| 124 & 125 | Approval of a local modification either: i) agreed by a commissioner and provider, or ii) applied for by a provider in the absence of commissioner agreement | Monitor | Monitor must notify NHSCB |
| 126 | Notification of commissioners that a health services configuration is putting service provision at risk | Monitor | Monitor must notify NHSCB |
| 127 | Correction of mistakes by publishing a notice | Monitor | N/A |


The Act states that if agreement between NHSCB and Monitor cannot be reached where required, the decision must be referred to arbitration.

In addition section 116(13) requires Monitor to have regard to the objectives and requirements in the NHSCB's mandate from the Secretary of State, in all pricing activities and in addition section 290 requires Monitor and NHSCB to co-operate with each other in the exercise of all of their respective functions.

Appendix 2 –Types of decisions

The table below describe the ways of working or decisions types relevant to joint pricing decisions

Joint decision-making required or preferred



| Nature of CB and Monitor relationship | Plan together | Work together or work alone | Inform/notify each other prior to publication | Monitor together | Decide together or decide alone | Publically support |
|---|---|--|--|---|---|--|
| Plan together work together monitor together decide together | All joint pricing work takes account of agreed joint strategy | An expert team made up of both organisations is tasked to: jointly scope the task, define the context and key drivers, develop possible solutions and make recommendations | Before publishing to the sector the joint expert team will recommend a shared publication and communication strategy, which both organisations will agree | Progress is reported to the Joint Tariff Development & Delivery Group | Final decision on joint recommendations and communication strategy is made by both organisations together at a joint governance meeting, or at separate governance meetings but at a similar time and with the same information | Both organisations will publically support each other's role in delivering their shared objectives and decisions where these have been reached together or worked on together. |
| Plan together work alone monitor together decide together | All joint pricing work takes account of agreed joint strategy | An expert or team from the lead organisation only is tasked to: scope the task, define the context and key drivers, develop possible solutions and make recommendations <small>(Note: an option could be to include a person from the other organisation in the team)</small> | Before publishing to the sector, the lead organisation will recommend a shared publication and communication strategy, which both organisations will agree | Progress is reported to the Joint Tariff Development & Delivery Group | Final decision on recommendations and communication strategy is made by both organisations together at a joint governance meeting, or at separate governance meetings but at a similar time and with the same information | Both organisations will publically support each other's role in delivering their shared objectives and decisions where these have been reached together or worked on together. |

The table below describe the ways of working or decisions types relevant to solo pricing decisions

Joint decision-making not required

| Nature of CB and Monitor relationship | Plan together | Work together or work alone | Inform/notify each other prior to publication | Monitor together | Decide together or decide alone | Publically support |
|---|---|--|--|---|---|---|
| Plan together work together monitor together decide alone | All joint pricing work takes account of agreed joint strategy | An expert team made up of both organisations is tasked to: jointly scope the task, define the context and key drivers, develop possible solutions and make recommendations | Before publishing to the sector the joint expert team will recommend a publication and communication strategy | Progress is reported to the Joint Tariff Development & Delivery Group | Final decision on joint recommendations and communication strategy is made by the lead organisation's governance forum only | Both organisations will publically support each other's role in delivering their shared objectives and publically support decisions where these have been reached together or worked on together. |
| Work alone decide alone | Not applicable | An expert or team from the lead organisation only is tasked to: scope the task, define the context and key drivers, develop possible solutions and make recommendations | The lead organisation will notify the other of its intent to publish before publication (subject to any potential conflicts of interest) | Not applicable | Final decision on recommendations and communication strategy is made by the lead organisation's governance forum only | Not applicable |

Appendix 3 – List of highest level pricing decision

The tables below lists 11 recurrent decisions which it is recommended are reserved for the Boards:

| Decision | Description | Type | Monitor | NHS CB | Delegated to JPE? |
|---|---|--------------------------------------|---------|---------|---|
| 1. Long term pricing and payments vision/direction of travel and route map (5 -10 years horizon, with an annual stock take) | Regulatory framework and architecture, incentives, information requirements, rules, tools, sector engagement and development to 2020. | Work together Decide together | Agrees | Agrees | No-recommends decision to be taken at CB and Monitor Boards |
| 2. Short term pricing plan | Regulatory framework and architecture, incentives, information requirements, rules, tools, sector engagement and development for period 2013-2015 | Work together Decide together | Agrees | Agrees | No-recommends decision to be taken at CB and Monitor Boards |
| 3. Pre consultation National Tariff testing gateway (pass or fail) | Results from financial risk impact on commissioners and providers | Work together Decide Together | Agrees | Agrees | No-recommends decision to be taken at CB and Monitor Boards |
| 4. Pre consultation National Tariff testing gateway (pass or fail) | Expert and technical feedback Prioritisation of proposed policies and their impact | Work together Decide alone | Leads | Informs | No - taken by the Monitor Board |
| 5. Post consultation referral to Competition Commission | Whether to refer methodology for proposed National Tariff to Competition Commission or change methodology and re consult | Work alone Decide alone | Leads | Informs | No - taken by the Monitor Board |
| 6. Rules for local modification | Rules and method by which providers and commissioners agree | Work alone/ together?* | Lead | Agrees | (In the first year) No- |

| | | | | | |
|--|--|----------------------------------|-------|----------|--|
| | and/or providers apply for a local modification to a mandated price | Decide together | | | recommends decision to be taken at CB and Monitor Boards |
| 7. Pricing for unspecified currencies and services | Guidance, as necessary, by which providers and commissioners agree prices for a service that is not within the scope of the National Tariff | Work together Decide together | Lead | Agrees | (In the first year) No-recommends decision to be taken at CB and Monitor Boards |
| 8. Final National Tariff post consultation | Agreed National Tariff for publication | Work alone Decide together | Leads | Agrees | (In the first year) No-recommends decision to be taken at CB and Monitor Boards |
| 9. Corrections to the National Tariff content post publication | Communication of agreed amendments to correct errors (NHS CB are responsible for those corrections to the elements of the NTD that they have lead responsibility and Monitor will publish agreed corrections) | Work alone decide alone | Leads | Informed | No – decision made by Monitor governance (dependent on nature of the correction) |
| 10. Local Modifications case decisions and communication | Dissemination of decisions on Local Modifications | Work alone decide alone * | Leads | Informed | No – decision made by Monitor governance |

* NHS CB propose that this is work together given relationship to policies on failure regime and fair playing field

The table below lists the one off pricing decisions reserved for the Boards

| Decision | Description | Type | Monitor | NHS CB | Delegated to JPE? |
|--|---|----------------------------------|----------------|---------------|--|
| A. Arbitration initiation | Means by which arbitration is initiated on failure to agree | Work together Decide together | Agrees | Agrees | No-Monitor Board and CB Board will wish to decide this |
| B. Process for Competition Commission referral | Process for working with Competition Commission post referral | Work alone Decide alone | Leads | Informed | No-Monitor Board will wish to decide this |
| C. Changes to National Tariff content post Competition Commission referral | Amendments to National Tariff subsequent to Competition Commission ruling * | Work together Decide together | Leads | Agrees | No-Monitor Board and CB Board will wish to decide this |
| D. Assurance and enforcement regime and decisions | Means to assure, audit and enforce pricing licensing conditions and actions | Work alone Decide alone | Leads | Informed | No-Monitor Board decision |

* If the Competition Commission require a change to the National Tariff which impacts on the NHS CB, this will need to be agreed with the NHSCB.

The table below lists the 14 decisions which are recommended are delegated to the JPE

| Decision | Description | Type | Monitor | NHS CB | Delegated to JPE? |
|---|---|----------------------------------|----------------|---------------|--|
| 11. National Tariff Delivery Plan (12 months detailed plan, milestones for years 2 and 3) | Functional/segment based plan with actions, owners and KPIs on: design, information capture, method development, testing, publishing, sector education and engagement | Work together Decide together | Lead | Agrees | Yes – on recommendation from Joint Pricing Development and Tariff Delivery Group |
| 12. Costing Strategy * (3 year horizon with an annual | Means to improve cost data underpinning pricing | Work alone* Decide together | Lead | Agrees | Yes |

| | | | | | |
|---|--|----------------------------------|--------|--------|-----|
| stock take) | | | | | |
| 13. Cost collection and allocation guidance * | Annual guidance to sector on scope and rules | Work alone Decide together | Lead | Agrees | Yes |
| Draft National Tariff for consultation | 14. Scope of services specification for the national tariff | Work alone Decide together | Agrees | Leads | Yes |
| Draft National Tariff for consultation | 15. Definition of currencies within agreed scope of services | Work together Decide together | Agrees | Agrees | Yes |
| Draft National Tariff for consultation | 16. Description of methodology for tariff calculation | Work together Decide together | Leads | Agrees | Yes |
| Draft National Tariff for consultation | 17. Impact assessment process for the Tariff | Work alone Decide together | Leads | Agrees | Yes |
| Draft National Tariff for consultation | 18. Mandated prices and rules for adjustment | Work alone Decide together | Lead | Agrees | Yes |
| Draft National Tariff for consultation | 19. Rules for agreeing local prices for national currency (i.e. specified currency but not a national price) | Work together Decide together | Lead | Agrees | Yes |
| Draft National Tariff for consultation | 20. Rules for varying national currencies at a local level | Work alone Decide together | Agrees | Leads | Yes |
| Draft National Tariff for consultation | 21. Additional guidance | Work together Decide together | Leads | Agrees | Yes |
| 22. Consultation process design | Methodology for consulting on and testing the draft National Tariff Document | Work alone Decide together | Leads | Agrees | Yes |

| | | | | | |
|---|--|----------------------------------|--------|--------|-----|
| 23. Post consultation changes to the National Tariff Document | Agreed changes to be made to the National Tariff Document post statutory consultation and prior to publication | Work together Decide together | Agrees | Agrees | Yes |
| 24. Sector pricing education development programme (annually updated) | Content of and delivery of education, guidance and advice to sector | Work together Decide together | Joint | Joint | Yes |