



## NICE Consultation on Potential COF Indicators

### Response from the Royal College of Surgeons of England

The College welcomes the NICE consultation on proposed indicators for the commissioning outcomes framework. We note that the intention is for the COF to be an accountability framework for clinical commissioning groups (CCGs), such that the NHS Commissioning Board will be able to identify the contribution of CCGs in achieving the priorities set out in the NHS Outcomes Framework.

In relation to surgery, the surgical specialty associations will have detailed knowledge on the indicators that will enhance health improvement. Given this, and the short timescale for consultation, the College's response is at this stage deliberately high level. If more time was available within the consultation period to engage with the specific technical detail of the indicators, the College would be happy to contribute further.

#### Consultation with Professional Bodies

The College considers it essential that NICE consults closely with the surgical specialty associations and related groups on the development of the COF indicators. These groups possess detailed, specialty-specific knowledge and will be best placed to advise on indicators that are meaningful and have a true impact on health improvement. Failure to engage at this level may lead to inappropriate indicator selection and may preclude proven, specialty-specific tools from being used. As an example, the proposed indicators may use generic measures where better, more specific, alternatives are available and, in some cases, already collected nationally (eg. the Oxford hip score for hip replacement surgery).

#### Ability to Define CCGs Contribution

The Commissioning Board will face a significant challenge in ensuring the COF is a meaningful method for holding CCGs to account. To support accountability at all levels, it will be important to build the framework using indicators that can detect differences between organisations (both those providing care and those purchasing it).

The Commissioning Board will expect CCGs to help to deliver improvements on the indicators defined in the NHS Outcomes Framework. There is concern that CCGs may become overwhelmed if too many indicators are selected and that CCGs operating in areas of high deprivation may find it more difficult demonstrate improvements to the required level.

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**February 2012**