



REPORT TO: MORAY INTEGRATION JOINT BOARD AUDIT, PERFORMANCE AND RISK COMMITTEE ON 13 DECEMBER 2018

SUBJECT: PAYMENT VERIFICATION ASSURANCE UPDATE

BY: CHIEF OFFICER

1. REASON FOR REPORT

1.1 The purpose of this report is to update the Audit Performance & Risk Committee (APR) on the activity of the Payment Verification (PV) Assurance Group during 2017/18 and the Revised Payment Verification Protocols for all contractor groups as detailed in the Document List (DL) (2018)19. This report allows the Committee to be sighted on the key issues highlighted during the course of the year.

2. RECOMMENDATION

2.1. It is recommended that the Audit Performance & Risk Committee:

- i) consider the arrangements in place in Grampian for the management of the payment verification process;**
- ii) note the outcomes from the Payment Verification process during 2018/19; and**
- iii) note the review of the PV Service provided by National Services Scotland (NSS) Practitioner Services Divisions (PSD) on behalf of NHS Grampian.**

3. BACKGROUND

3.1. NHS Grampian has statutory responsibility for monitoring contracts with Family Health Service providers covering General Medical services (GMS) Dental Pharmacy and Optometry.

3.2. Contracts with independent practitioners for the delivery of Family Health Services (FHS) i.e. General Medical, General Pharmaceutical, General Dental and Ophthalmic services are, mainly, subject to nationally agreed terms and

conditions, with some exceptions that allow for local agreement on enhanced services.

- 3.3. NHS Boards are the accountable bodies for the delivery of FHS and are required to ensure that payments made to independent practitioners are valid and in line with agreed contractual arrangements, timely and accurate. The responsibility for the planning and delivery of FHS was delegated to the three Grampian Integration Joint Boards (IJB's) with effect from 1 April 2016 and the operational management of these services is hosted by the Moray IJB on behalf of all three.
- 3.4. As part of the NHS Grampian Audit process, the PV Assurance Group implements and oversees management arrangements covering pre and post verification of payments across all independent medical, dental, pharmaceutical and ophthalmic primary care practitioners. PV is regulated through the protocols set out in the (NHS) Chief Executive's Letter (CEL) DL (2018) 19 issued in October 2018.
- 3.5. NHS Grampian's PV Assurance Group is chaired by the Service Manager for Primary Care Contracts (PCC). Membership includes Health & Social Care Partnership (HSCP), Primary Care Leads, Finance Manager, Clinical and Planning Leads, representatives from the PCC Team and Practitioners Services Department (PSD) Links are maintained with NHS Counter Fraud Services and the Assistant Director of Finance who is also NHS Grampian's Fraud Liaison Officer via the Chair of the PV Assurance Group.

4. KEY MATTERS RELEVANT TO RECOMMENDATION

- 4.1 The Payment Verification process is embedded in local management performance and governance processes, within the H&SC Partnerships, for primary care. Information from the formal PV reports prepared by Practitioner Services Division in line with regulatory requirements as outlined in the CEL is used alongside local knowledge to identify areas of interest or concern. Where relevant, these are then followed up either across the whole contractor group, or with individual contractors as appropriate.
- 4.2 In the year 2017/18, there have been some significant challenges identified in relation to the PV service provided by PSD and as such, the Service Manager Primary Care Contracts has begun a review of this service.

Medical

- 4.3 The revision for 2018 -19 PV reflects the changes to the GP Contract and the introduction of the Scottish Workload Formula (SWF). As a result the following areas have been removed from the PV Protocol;
 - Organisational Core Standard Payment
 - Temporary Patients Adjustment (TPA)
 - Additional Services
 - Quality and Outcome Framework (QOF)

4.4 The following areas are now determined within the PV requirements for Primary Medical Services; these are detailed in full in the PV Protocol:

- Retention of evidence
- Data Protection
- Premises and IT Costs
- PV of Global Sum
- Random Checking
- Targeted checking
- PV Practice Visit
- Trend Analyses
- PV of Board Admin Funds
- PV for Enhanced Services
- GP Practice System Security

4.5. PSD carried out seven PV practice Visits in the year 2017/18 (Quarter 3- October - December). As a consequence of these visits, several recoveries were made in relation to; High Risk Medicines Monitoring; Minor Surgery and Extended Hours.

4.6. NHS Grampian Enhanced Service Group requested PSD to support the review of the Local Enhanced Service (LES) Contract for Homeopathy Service and because of data received, this LES was withdrawn in October 2018. The withdrawal of the LES was ratified by NHS Grampian Local Medical Contract negotiation Committee. On review of the Service it became apparent that the significant reduction in numbers being referred meant the Service was not fulfilling the terms of the contract. The annual cost of the LES to NHS Grampian was, £36,696 per annum (£3,058 per month).

Dental

4.7. One of the methods of verifying payments made under the General Dental Services arrangement is to examine patients. This is carried out by the Scottish Dental Reference Service (SDRS).

4.8 In the Report to the Audit and Risk Committee on 28 September 2017 (para 8 of the minute refers), The Service Manager Primary Care Contracts expressed concern about the access to the Dental Reference Officers (DRO) and the considerable length of time for outputs to be shared with NHSG PV Assurance Group.

4.9 Members of the PV assurance Group met with the Dental Director, National Services Scotland in 2017, where these concerns were noted. This resulted in more assurance that random DROs were being actioned. However, in the recent months there is again a concern about this service. This has been raised with PSD and will be discussed in full with Senior Management.

4.10. NHS Grampian closely monitors the performance of Scottish Dental Access Initiative (SDAI) practices through the PV group and the Dental Performance Advisory Group and as a result can report that 3 such practices are undergoing recovery of grant aided money as a result of non-compliance. This amounts to £235,071.43 across all three practices.

Ophthalmic

- 4.11. There are no significant concerns regarding care and treatment or recovery of claims within the Ophthalmic PV reports
- 4.12. There is however concern about the timescales for reporting on PV requirements.

Pharmacy

- 4.13 There are no significant concerns regarding care and treatment or recovery of claims within the Ophthalmic PV reports
- 4.14. There is however concern about the timescales for reporting on PV requirements

5. SUMMARY OF IMPLICATIONS

(a) Corporate Plan and 10 Year Plan (Local Outcomes Improvement Plan (LOIP)) and Moray Integration Joint Board Strategic Commissioning Plan 2016 – 2019

The MIJB requires effective governance arrangements for those services and functions delegated to it. Such governance arrangements include systems for managing risks.

(b) Policy and Legal

There are no legal implications arising from this report.

(c) Financial implications

There are no direct financial implications arising from this report but the Committee should note the failure to manage risks effectively could have a financial impact on the MIJB.

(d) Risk Implications and Mitigation

There is a risk that NHS Grampian does not have full assurance that PV is being carried out appropriately and as a result, they may not fulfil its statutory responsibility for monitoring contracts with Family Health Service providers covering General Medical services (GMS) Dental Pharmacy and Optometry.

The Service Manager Primary Care Contracts has, as identified earlier begun a significant review of the PV service across all contractors.

PSD visit NHS Board to jointly review performance under the partnership agreement and consider together service developments.

The current Partnership Agreement expires in March 2019 and therefore there will be an opportunity to discuss proposed changes, which will be effective for the three years April 2019 to March 2022. These changes are likely to modify some services and performance standards, notably in payment verification, and also updated arrangements for data processing and information sharing following the implementation of the General Data Protection Regulation in May 2018.

The NHS Grampian PSD Partnership Agreement meeting will also present the opportunity for NHS Grampian to fully address the challenges and concerns regarding timescales in particular detailed in this report and receive assurances that these will be remedied.

(e) Staffing Implications

There are no staffing implications directly arising from this report.

(f) Property

There are no implications in terms of Council or NHS property directly arising from this report.

(g) Equalities/Socio Economic Impact

An Equality Impact Assessment has not been completed because there are no service, policy or organisational changes being proposed

(h) Consultations

Consultation has taken place with key stakeholders from NHS Grampian; including Primary Care Clinical Leads, Management Leads, Finance colleagues and Directors of Contractor areas; Chief Financial Officer, Legal Services Manager (Litigation and Licencing) and Caroline Howie, Committee Services Officers and comments have been incorporated in this report.

6. CONCLUSION

- 6.1. The Audit Performance & Risk Committee is asked to note the content of this report and the continued work and arrangements around the payment verification process within NHS Grampian.**
- 6.2. It is also asked to support the review of the PV process being carried out and the proposed discussion and any necessary amendments to the Partnership agreement between NHS Grampian and PSD.**
- 6.3. Finally, it may be that the Audit Performance & Risk Committee request an update further to discussions with PSD regarding the Partnership Agreement.**

Author of Report: Patricia Morgan; Service Manager Primary Care Contracts

Background Papers: DL (2018)19. Revised Payment Verification Protocols –
General Dental Services, Primary Care Services, General
Ophthalmic Services, Pharmaceutical Services.

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