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**REPORT TO: MORAY INTEGRATION JOINT BOARD AUDIT, PERFORMANCE AND RISK COMMITTEE ON 19 SEPTEMBER 2019**

**SUBJECT: PAYMENT VERIFICATION ASSURANCE UPDATE**

**BY: SEAN COADY, HEAD OF SERVICE**

**1. REASON FOR REPORT**

- 1.1 The purpose of this report is to provide an update on the review of the Payment Verification (PV) Assurance Service provided by National Services Scotland (NSS) Practitioner Services Divisions (PSD), on behalf of NHS Grampian.

**2. RECOMMENDATION**

- 2.1. It is recommended that the Audit Performance & Risk Committee consider and note:

- i) the arrangements in place in Grampian for the management of the payment verification process;
- ii) the issues that have been highlighted in relation to the payment verification process; and
- iii) the actions already taken to address the issues, with plans for future action to include an update on progress to this committee in March 2020

**3. BACKGROUND**

- 3.1. NHS Grampian has statutory responsibility for monitoring contracts with Family Health Service (FHS) providers covering General Medical services (GMS), Dental, Pharmacy and Optometry.
- 3.2. Contracts with independent practitioners for the delivery of 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, timely and accurate and in line with agreed contractual arrangements. The responsibility for the planning and delivery of FHS was delegated by NHS Grampian to the three Grampian Integration Joint Boards (IJB's) with effect from 1 April 2016. Moray Integration Joint Board (MIJB) hosts the Primary Care Contracts Team (PCCT) on behalf of all three IJBs.
- 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 Partnerships (HSCP), Primary Care Leads, Finance Manager, Clinical and Planning Leads, representatives from the PCCT and Practitioners Services Division (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.
- 3.6. Whilst the majority of PV will be undertaken by PSD, there may be instances where it is more appropriate for PV to be undertaken by the NHS Board. Consequently, there is an onus on PSD and the NHS Board to agree the annual payment verification programme.
- 3.7. Formal Medical, Pharmacy, Dental and Ophthalmic PV Assurance Meetings are held quarterly with the leads from each of the partnerships across Grampian, to agree the programme of practice visits and to ensure appropriate management oversight of the process. PV issues are dealt with on an ongoing basis, as they arise during the course of the year, and are fed through a number of performance and management groups across all contractor areas and within local HSCP performance management structure
- 3.8. A report was submitted to this committee on 13 December 2018 (para 10 of the minute refers) with a subsequent action to provide an update on progress.

#### **4. KEY MATTERS RELEVANT TO RECOMMENDATION**

- 4.1 Difficulties were experienced in receiving updates on progress for the improvement of PSD/PV outcomes since the previous report in December 2018.
- 4.2 The Service manager undertook a review across all PV contractual areas early in 2019 and highlighted a number of concerns. A meeting was requested with the Associate Director, Practitioners and Counter Fraud Services, National Services Scotland (NSS) which took some time to schedule

due to several factors impacting on key attendees, however the meeting took place in July 2019.

- 4.3 At this meeting assurances were provided by the Associate Director and an action plan was agreed.
- 4.4 To date there has not been any further update on the actions and outcomes from the Associate Director. A response on progress to achieve the outcomes identified in **Appendix 1** is expected imminently however, as the Practitioners Services Division (NSS) is due to visit NHS Grampian in October to review performance under the Partnership Agreement and consider any service agreements. This will provide an opportunity to seek assurance that the Director of PSD, NSS has directed resource to ensure matters are being progressed.

## **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 financial implications arising directly from this report.

### **(d) Risk Implications and Mitigation**

Whilst the issues identified in **Appendix 1** remain, there is a risk that assurance cannot be provided to NHS Grampian that Payment Verification is being carried out appropriately.

### **(e) Staffing Implications**

There are no staffing matters arising directly as a result of 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 is not required because there are no service, policy or organisational changes proposed in this report.

### **(h) Consultations**

Consultation has taken place with the Head of Service, Chief Financial Officer, Corporate Manager and Caroline Howie, Committee Services Officer and comments incorporated in this report.

## **6. CONCLUSION**

### **6.1 This report and Appendix 1 set out the arrangements around the payment verification process and actions required to address areas of concern.**

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.

Ref: