



PWYLLGOR ARCHWILIO A SICRWYDD RISG AUDIT AND RISK ASSURANCE COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	16 August 2022
TEITL YR ADRODDIAD: TITLE OF REPORT:	End of Year Post Payment Verification Report - 1 st April 2021 – 31 st March 2022
CYFARWYDDWR ARWEINIOL: LEAD DIRECTOR:	Huw Thomas, Director of Finance
SWYDDOG ADRODD: REPORTING OFFICER:	Huw Thomas, Director of Finance

Pwrpas yr Adroddiad (dewiswch fel yn addas)

Purpose of the Report (select as appropriate)

Er Gwybodaeth/For Information

ADRODDIAD SCAA

SBAR REPORT

Sefyllfa / Situation

This paper highlights the narrative on how practices have been performing over the current Post Payment Verification (PPV) cycle, and two previous. It also demonstrates the overall performance of the UHB against the national averages. PPV of claims from General Medical Services (GMS), General Ophthalmic Services (GOS) and General Pharmaceutical Services (GPS) are undertaken as a part of an annual plan by NHS Wales Shared Services Partnership (NWSSP).

Cefndir / Background

To effectively respond to challenges identified within Primary Care and moving forward in 2021/2022 with the Covid-19 pandemic, a review of opportunities were considered during this time, to maintain an acceptable level of PPV, which would continue to provide Health Boards with assurance that public monies are being appropriately claimed.

These decisions have been taken to protect our front-line services, to maintain colleagues' safety and to remove any pressure on primary care contractors and their teams during unprecedented times. The paper is being produced for the Committee to review for information purposes and discussion. PPV provides assurance in all contractor disciplines, except for General Dental Services. At certain times throughout COVID-19, cash flow to medical and ophthalmic contractors has been maintained based on historical claiming patterns, due to submission of claims for various enhanced services being suspended.

NWSSP reviewed how it was able to reinstate an agreed level of PPV within both the Ophthalmic, Pharmaceutical and Medical disciplines along with the Clinical Waste Audit.

Asesiad / Assessment

General Medical Services (GMS)

The visit plan runs on a 3-year cycle. Following review of the All-Wales visit plan and the inability to perform physical visits, we concentrated on our PPV arrangements within the GMS discipline. These visits can be completed remotely and would not be intrusive or place additional requirements on local front-line service provision. Remote access verification took place based on a sample of claims submitted from April 2019 to March 2020, due to the sudden decrease of claims from the point of

lockdown in March 2020. It was agreed by the General Practitioner Committee Wales and Heads of Primary Care that PPV proceed with the GMS visits during the 2021-2022 financial year as part of the PPV three-yearly cycle, utilising 2019-2020 claim data from April 2021.

General Ophthalmic Services (GOS)

Pre COVID-19, the visit plan for GOS 2020-2021 was agreed by Health Board Audit Committees. However, ophthalmic practices were unable to remain open to the public for certain periods and this is a service where PPV teams did not have the ability to undertake reviews via remote access. We explored PPV remote access options, with full support from Optometry Wales, and have begun to carry out these visits via Microsoft TEAMS which is proving successful. Future visits will now be included in the 2022-2023 visit plan, and we are hoping to increase the number of contractors as we progress in this new way of working which is being encouraged by Welsh Government. We also continue to undertake the GOS quarterly patient letter programme across Wales to provide additional elements of assurance to our Health Boards.

Pharmacy Services (GPS)

Due to COVID-19, the Medicines Use Review (MUR) service was stopped in March 2020. In 2022, NWSSP is currently introducing a pilot for two new service checks by PPV, which are the Quality and Safety Scheme and the Collaborative Working Scheme.

Other PPV work

- PPV have been conducting Bonus Payment checks (as requested by Welsh Government) relating to payments claimed and made to Primary Care Health Service staff in 2021.
- Provision of Additional Training Methods
- PPV Pilot - Checking eligibility of patients who qualify for Dispensing. Ready to roll this out nationally in 2022 - 2023.

The additional reports submitted detail specific risks as outliers in a traffic light system, and provide the narrative for what PPV, Primary Care, Finance and Counter Fraud consider to be the best approach to support practices in improving.

The GMS statistics worksheet now separates the routine and the revisit averages.

Revisits are generally higher percentages due to 100% of the claims being checked over a longer period.

Argymhelliad / Recommendation

The report is for assurance and review by the committee. We are proactive in our support, guidance and training we deliver to our contractors to aid with further improvements.

Amcanion: (rhaid cwblhau)

Objectives: (must be completed)

Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	5.14 Receive an assurance on Post Payment Verification Audits through quarterly reporting to the Committee
Cyfeirnod Cofrestr Risg Datix a Sgôr Cyfredol: Datix Risk Register Reference and Score:	N/A

Safon(au) Gofal ac Iechyd: Health and Care Standard(s):	7. Staff and Resources
Amcanion Strategol y BIP: UHB Strategic Objectives:	3. Striving to deliver and develop excellent services
Amcanion Cynllunio Planning Objectives	3A Improving Together
Amcanion Llesiant BIP: UHB Well-being Objectives: Hyperlink to HDdUHB Well-being Objectives Annual Report 2018-2019	8. Transform our communities through collaboration with people, communities and partners

Gwybodaeth Ychwanegol: Further Information:	
Ar sail tystiolaeth: Evidence Base:	Evidence is collated based on claims submitted by contractors of a specific sample period
Rhestr Termiau: Glossary of Terms:	Included in the body of the report
Partion / Pwyllgorau â ymgynhorwyd ymlaen llaw y Pwyllgor Archwilio a Sicrwydd Risg: Parties / Committees consulted prior to Audit and Risk Assurance Committee:	N/A

Effaith: (rhaid cwblhau) Impact: (must be completed)	
Ariannol / Gwerth am Arian: Financial / Service:	To promote value for money by deterring and preventing fraud and loss
Ansawdd / Gofal Claf: Quality / Patient Care:	N/A
Gweithlu: Workforce:	N/A

Risg: Risk:	N/A
Cyfreithiol: Legal:	N/A
Enw Da: Reputational:	N/A
Gyfrinachedd: Privacy:	N/A
Cydraddoldeb: Equality:	N/A

We have representatives from every Health Board in Wales and have set up a newly reformed GMS working Group. These meetings are held bimonthly and are very successful. This is to keep communications open and transparent between PPV and Health Boards whilst also collaboratively working to review specifications and ensure standardised approach for PPV remote access samples.

Hold National and local counterfraud (CF) quarterly meetings to discuss the PPV work being carried out and any issues that we feel need to be raised. This establishes excellent working communications with our CF colleagues across Wales and avoids any duplication of work.

We are in the process of becoming an All Wales service. This will guarantee a more robust PPV team and ensure business continuity.

We have developed a video recorded guide to PPV to aid contractors and equip them with useful information in a simplified format/update FAQ documents.

To use technology to continue one-on-one training requirements from practices that request this as this was previously undertaken in person in the practice premises.

New 360 degree PPV questionnaire released to capture feedback from our contractors after a PPV visit has taken place and the file is closed.

All PPV audit reports are sent to the Director of Primary Care for information purposes and for feedback.

Began PPV training/Roadshow events to Practice Managers across Wales, utilising technology to host these events as opposed to 'in-person' presentations.

Currently verifying contractor Bonus claims and payments to NHS staff in Wales as required by Welsh Government.

We have re-established our quarterly meeting with ourselves, Primary Care, Counter Fraud and finance in our quarterly meetings. The idea behind this being that we can decide on appropriate actions from the appropriate division for all the practices in Amber and Red.

General Ophthalmic Services, we can now complete remote access PPV visits after a successful pilot. We continue to utilise trend analysis data to write out to patients to ensure they are receiving the services that have been claimed in their names.

PPV will begin a Pilot working on 2 New services checks for Pharmacy from April 2022. These are the Collaborative working Scheme and the Quality and Safety Scheme.

Hywel Dda University Health Board
GMS PPV Progress Report: April 2021 to March 2022

0-4%	Low risk
5-9%	Medium risk
10%+	High risk

UHB Claim error % Ave	9.62%
Wales claim error % Ave	12.68%
2021/22 recovery amount	£92,666.65

Practice code	Visit 1				Visit 2				Visit 3					
	Visit date	Visit type	Claim error %	Recovery	Visit date	Visit type	Claim error %	Recovery	Visit date	Visit type	Sample size	Claim errors	Claim error %	Recovery
Practice 1	Dec-11	Routine	9.96%	£0.00	Jun-14	Routine	1.99%	£124.82	May-21	Routine	382	12	3.14%	£300.28
Practice 2	Jul-18	Routine	3.74%	£297.94	Oct-19	REVISIT	5.55%	£930.40	Jul-21	Routine	573	15	2.62%	£499.74
Practice 3	Jan-18	Routine	2.43%	£674.17	Jun-19	REVISIT	1.64%	£207.84	Apr-21	Routine	330	4	1.21%	£222.54
Practice 4	Mar-16	Routine	3.95%	£311.31	Aug-17	REVISIT	27.34%	£7,175.55	Jun-21	Routine	216	12	5.56%	£190.38
Practice 5	Jun-18	Extended Routine	13.62%	£549.14	Apr-21	REVISIT	1.08%	£1,934.64	Feb-22	Routine	779	23	2.95%	£993.90
Practice 6	Oct-14	Routine	1.42%	£100.40	Jan-18	Routine	0.76%	£50.42	Jun-21	Routine	507	6	1.18%	£320.40
Practice 7	Jun-18	Routine	3.87%	£829.61	Nov-19	REVISIT	17.53%	£1,514.80	Jul-21	Routine	520	11	2.12%	£1,037.89
Practice 8	Nov-16	REVISIT	5.34%	£398.29	Oct-17	Routine	1.13%	£119.56	Aug-21	Routine	379	36	9.50%	£1,976.73
Practice 9	Dec-17	Routine	4.12%	£743.93	Jul-19	REVISIT	10.55%	£417.76	Sep-21	Routine	325	14	4.31%	£417.76
Practice 10	Mar-18	Routine	1.69%	£202.03	Aug-19	REVISIT	1.34%	£144.68	Jul-21	Routine	569	10	1.76%	£357.36
Practice 11	Mar-15	Routine	0.34%	£7.71	Apr-18	Routine	2.46%	£138.51	Jun-21	Routine	318	19	5.97%	£766.67
Practice 12	Apr-17	Routine	3.43%	£460.08	May-19	REVISIT	23.08%	£811.73	Oct-21	Routine	400	6	1.50%	£414.01
Practice 13	May-18	Routine	2.84%	£295.55	Aug-19	REVISIT	3.28%	£19.60	Dec-21	Routine	633	5	0.79%	£137.68
Practice 14	Dec-14	Routine	0.97%	£53.29	Jun-17	Routine	0.87%	£39.30	May-21	Routine	310	53	17.10%	£1,124.55
Practice 15	Sep-17	Routine	3.02%	£183.30	Mar-20	REVISIT	8.23%	£3,554.25	Jul-21	Routine	351	14	3.99%	£471.62
Practice 16	Dec-18	Routine	5.28%	£704.99	Jan-21	REVISIT	26.47%	£990.00	Aug-21	Routine	440	27	6.14%	£700.59
Practice 17	Nov-15	REVISIT	1.31%	£287.80	Aug-18	Routine	0.73%	£78.94	Aug-21	Routine	497	5	1.01%	£462.22
Practice 18	Nov-18	Routine	5.62%	£634.35	Jan-20	REVISIT	61.54%	£1,541.76	Aug-21	Routine	353	11	3.12%	£553.02
Practice 19	Sep-17	Routine	3.58%	£570.23	Nov-19	REVISIT	11.48%	£3,282.54	Jul-21	Routine	408	10	2.45%	£589.78
Practice 20	Jan-19	Routine	2.90%	£166.02	Jan-21	REVISIT	0.00%	£0.00	Sep-21	Routine	273	8	2.93%	£470.72
Practice 21	Oct-18	Routine	5.03%	£1,189.79	Feb-20	REVISIT	13.41%	£1,070.00	Sep-21	Routine			Visit file in progress	
Practice 22	Nov-18	Routine	20.00%	£4,756.49	Feb-19	REVISIT	62.12%	£57,259.49	Jan-22	Routine	415	16	5.06%	£288.73
Practice 23	Nov-16	Routine	1.98%	£125.77	Jun-18	Routine	10.31%	£1,037.69	Aug-21	Routine	328	37	11.28%	£544.18
Practice 24	May-17	Routine	2.85%	£573.20	Jun-19	REVISIT	29.41%	£1,328.85	May-21	Routine	673	28	4.16%	£522.14
Practice 25	Sep-18	Routine	8.13%	£1,467.62	Nov-20	REVISIT	29.90%	£5,005.00	Oct-21	Routine	248	1	0.40%	£25.84
Practice 26	Mar-18	Routine	5.93%	£467.57	Jan-20	REVISIT	11.44%	£1,418.92	Aug-21	Routine	275	23	8.36%	£937.13
Practice 27	Oct-17	Routine	3.45%	£208.69	Jun-19	REVISIT	4.31%	£1,027.95	Aug-21	Routine	410	11	2.68%	£440.01

Practice code	Visit 1				Visit 2				Visit 3					
	Visit date	Visit type	Claim error %	Recovery	Visit date	Visit type	Claim error %	Recovery	Visit date	Visit type	Sample size	Claim errors	Claim error %	Recovery
Practice 28	Jul-18	Routine	15.62%	£6,621.80	Oct-20	Routine	8.70%	£924.19	Oct-21	REVISIT	95	34	35.79%	£3,515.00
Practice 29	Oct-19	REVISIT	0.00%	£0.00	Oct-20	Routine	5.84%	£983.70	Jan-22	REVISIT	238	56	23.53%	£3,650.54
Practice 30	Jan-18	REVISIT	14.01%	£10,547.09	Mar-19	Routine	11.75%	£1,367.66	Sep-21	REVISIT	2307	382	16.56%	£4,535.84
Practice 31	Dec-18	REVISIT	8.23%	£5,101.08	Mar-19	Routine	10.92%	£2,450.47	Mar-22	REVISIT	3082	730	23.69%	£30,146.23
Practice 32	Aug-16	Routine	3.49%	£242.20	Jan-20	REVISIT	3.16%	£380.32	Dec-21	REVISIT	69	10	14.49%	£360.53
Practice 33	Oct-16	Routine	1.24%	£77.92	Feb-20	Routine	4.18%	£2,085.02	Feb-22	REVISIT			Visit file in progress	
Practice 34	Nov-19	REVISIT	23.57%	£924.96	Nov-19	Routine	14.59%	£2,518.60	Feb-22	REVISIT	2381	101	4.24%	£2,042.02
Practice 35	Apr-19	REVISIT	4.42%	£2,680.81	Nov-20	Routine	5.51%	£729.36	Jan-22	REVISIT	18	7	38.89%	£519.59
Practice 36	May-16	Routine	1.98%	£403.85	May-19	Routine	5.78%	£862.33	Feb-22	REVISIT	17	5	29.41%	£454.00
Practice 37	Feb-20	REVISIT	62.12%	£57,259.18	Jan-22	Routine	3.86%	£288.73	Feb-22	REVISIT	44	0	0.00%	£0.00
Practice 38	Jan-19	REVISIT	3.57%	£39.20	Sep-19	Routine	7.49%	£3,940.99	Feb-22	REVISIT	1591	238	14.96%	£23,102.27
Practice 39	Aug-18	REVISIT	2.33%	£167.53	Nov-19	Routine	1.66%	£445.53	Aug-21	REVISIT	37	1	2.70%	£110.00
Practice 40	Feb-18	REVISIT	27.60%	£6,386.70	Dec-19	Routine	7.09%	£1,582.96	Jan-22	REVISIT	3233	575	17.79%	£6,276.68
Practice 41	May-19	REVISIT	34.99%	£14,142.49	Nov-19	Routine	5.74%	£1,109.24	Mar-22	REVISIT	3745	114	3.04%	£3,188.08

	Health Board		
	2019/2020	2020/2021	2021/2022
Number of practices visited	36	15	41
Amount of claims sampled	38,524	7,120	27,769
Claim errors identified	4516	1306	2670
Average claim error rate	11.72%	18.34%	9.62%
Recovery amount	£115,710.40	£39,880.65	£92,666.65

	All Wales		
	2019/2020	2020/2021	2021/2022
Number of practices visited	234	187	218
Amount of claims sampled	171,919	85,352	135,276
Claim errors identified	21,550	9,954	17158
Average claim error rate	12.53%	11.66%	12.68%
Recovery amount	£466,107.55	£232,012.10	£364,626.53

	Health Board - ROUTINE		
	2019/2020	2020/2021	2021/2022
Number of practices visited	12	8	27
Amount of claims sampled	16,054	2,214	10,912
Claim errors identified	728	147	417
Average claim error rate	4.53%	6.64%	3.82%
Recovery amount	£18,264.47	£9,616.41	£14,765.87

	All Wales - ROUTINE		
	2019/2020	2020/2021	2021/2022
Number of practices visited	129	122	138
Amount of claims sampled	62,694	27,804	42,869
Claim errors identified	3,015	1,635	2586
Average claim error rate	4.80%	5.88%	6.03%
Recovery amount	£85,165.13	£68,772.35	£75,523.00

	Health Board - REVISIT		
	2019/2020	2020/2021	2021/2022
Number of practices visited	24	7	14
Amount of claims sampled	22,470	4,906	16,857
Claim errors identified	3788	1159	2253
Average claim error rate	16.86%	23.62%	13.37%
Recovery amount	£97,445.93	£30,264.24	£77,900.78

	All Wales - REVISIT		
	2019/2020	2020/2021	2021/2022
Number of practices visited	105	65	80
Amount of claims sampled	109,225	57,548	92,407
Claim errors identified	18,535	8,319	14572
Average claim error rate	16.97%	14.46%	15.77%
Recovery amount	£380,942.42	£163,239.75	£289,103.53

Hywel Dda University Health Board
GOS PPV Progress Report: April 2021 to March 2022

	0-4%	Low risk
	5-9%	Medium risk
	10%+	High risk

UHB Claim error % Ave	#DIV/0!
Wales claim error % Ave	11.41%
2021/22 recovery amount	£0.00

	Visit 1				Visit 2				Visit 3					
Practice code	Visit date	Visit type	Claim error %	Recovery	Visit date	Visit type	Claim error %	Recovery	Visit date	Visit type	Sample size	Claim errors	Claim error %	Recovery
No GOS visits undertaken 2021/22														

	Health Board		
	2019/2020	2020/2021	2021/2022
Number of practices visited	20	N/a	0
Amount of claims sampled	1,932	N/a	0
Claim errors identified	94	N/a	0
Average claim error rate	4.87%	N/a	0.00%
Recovery amount	£3,449.28	N/a	£0.00

	All Wales		
	2019/2020	2020/2021	2021/2022
	185	N/a	4
	21,803	N/a	412
	1,084	N/a	47
	4.97%	N/a	11.41%
	£40,408.95	N/a	£1,777.37

	Health Board - ROUTINE		
	2019/2020	2020/2021	2021/2022
Number of practices visited	15	N/a	0
Amount of claims sampled	1,542	N/a	0
Claim errors identified	71	N/a	0
Average claim error rate	4.60%	N/a	0.00%
Recovery amount	£2,797.02	N/a	£0.00

	All Wales - ROUTINE		
	2019/2020	2020/2021	2021/2022
	155	N/a	4
	16,236	N/a	412
	485	N/a	47
	2.99%	N/a	11.41%
	£18,037.07	N/a	£1,777.37

	Health Board - REVISIT		
	2019/2020	2020/2021	2021/2022
Number of practices visited	5	N/a	0
Amount of claims sampled	390	N/a	0
Claim errors identified	23	N/a	0
Average claim error rate	5.90%	N/a	0.00%
Recovery amount	£652.26	N/a	£0.00

	All Wales - REVISIT		
	2019/2020	2020/2021	2021/2022
	30	N/a	0
	5,567	N/a	0
	599	N/a	0
	10.76%	N/a	0.00%
	£22,371.88	N/a	£0.00