

PWYLLGOR ARCHWILIO A SICRWYDD RISG AUDIT AND RISK ASSURANCE COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	18 April 2023
TEITL YR ADRODDIAD: TITLE OF REPORT:	Post Payment Verification Report 1 April 2022 – 31 March 2023
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 Sicrwydd/For Assurance

ADRODDIAD SCAA SBAR REPORT

Sefyllfa / Situation

This report highlights the narrative on how practices have been performing over the current Post Payment Verification (PPV) cycle, and the two previous. It also demonstrates the overall performance of the Health Board 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).

The report is intended for the Committee to review and seek assurance that the Post Payment Verification cycle is being managed appropriately. PPV provides assurance in all contractor disciplines, except for General Dental Services.

Cefndir / Background

During the past year, 2022-2023, the PPV team has faced challenges associated with the ability to perform 'Business as Usual' due to a number of factors.

To effectively respond to challenges identified within Primary Care, we continued to investigate further avenues to enhance our PPV services, thereby maintaining an excellent level of PPV, which continues to provide Health Boards with reasonable assurance that public monies are being appropriately claimed.

Asesiad / Assessment

General Medical Services (GMS)

Following communications that went out on 20 December 2022 regarding the inability to undertake the entirety of the visits on the visit plan for 2022/2023, we are planning to condense all remaining visits from the 3-year visit plan into a 2-year period of 2023/24 and 2024/25.

We also experienced some transitional points with the introduction of the new payment system, therefore, a separate assurance exercise is being undertaken by our payment colleagues in

SSP for the data range January 2022 to September 2022. As a result, we will begin by checking the data submitted from practices from October 2022.

The length and period of data will extend as time moves forward, as it has done historically as part of the PPV assurance.

Regarding the revisits that were raised because of routine visits in the last financial year, and any outstanding visits, we will be utilising the same data; however, if a revisit is due at the same time as the routine visit, we will undertake an 'extended visit' which means 10% of the claims for the routine and 100% check on the services that were triggered in the initial routine visit.

The visit plan runs on a 3-year cycle for GMS and is agreed by Health Boards.

General Ophthalmic Services (GOS)

The visit plan for GOS 2022-2023 was agreed by Health Boards after explaining that these visits were subject to change due to beginning a new way of working. PPV began remote access options, having full support from Optometry Wales, and began to carry out virtual visits via Microsoft Teams, which proved successful. Future visits will now be included in the 2023-2024 visit plan, and although we are hoping to increase the number of remote visits, we are also incorporating physical visits to carry us through this transitional period of electronic claiming 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 2022/23, NWSSP introduced a pilot for two new service checks by PPV, which are the Quality and Safety Scheme and the Collaborative Working Scheme. We will now be going 'live' in April 2023 with the Quality and Safety scheme and seeking approval for our GPS visit plan from our Health Boards.

Additional Services

As requested by Welsh Government in 2022/2023, we have verified both Bonus Payments which were claimed and paid to all Health Service staff in 2021, and verified the PPV declaration for additional community pharmacy payments which were paid in 2022/2023.

We are providing a new service check for dispensing data and, after a successful pilot, we rolled this out nationally in August 2022 using the quarterly data from April-June 2022. This will continue as a quarterly service for all Health Boards across Wales.

With reference to the appended report, the GMS snapshot and statistics tab now separate the routine and the revisit errors and averages. Revisits are generally higher percentages due to 100% of the claims checked over a longer period.

Argymhelliad / Recommendation

The Audit & Risk Assurance Committee is requested to **NOTE** and **TAKE ASSURANCE** from the contents of this report, which details specific risks as outliers by means of a RAG rating system, and provides the narrative for what the PPV, Primary Care, Finance and Counter Fraud teams consider to be the best approach to support practices in improving.

Amcanion: (rhaid cwblhau) Objectives: (must be completed)	
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.14 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	Not Applicable
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
Partïon / 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

<p>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.</p>
<p>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.</p>
<p>We continue the transition into an All Wales service. This will guarantee a more robust PPV team and ensure business continuity.</p>
<p>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.</p>
<p>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.</p>
<p>New 360 degree PPV questionnaire released to capture feedback from our contractors after a PPV visit has taken place and the file is closed.</p>
<p>All PPV audit reports are sent to the Directors of Primary Care for information purposes and for feedback.</p>
<p>Began PPV training/Roadshow events to Practice Managers across Wales, utilising technology to host these events as opposed to 'in-person' presentations.</p>
<p>Verified contractor Bonus claims and payments to NHS staff in Wales as required by Welsh Government.</p>
<p>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.</p>
<p>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.</p>
<p>PPV will go Live on New services checks for Pharmacy from April 2023. This is the Quality and Safety Scheme. The Pilot for Collaborative working Scheme and the is still ongoing and are hoping to go Live on this scheme at some point in 2023/24.</p>
<p>We are now producing reports for out HB's and practices with all relevant incorrect Dispensing Patient data. This will be a quarterly piece of work for the PPV team.</p>

Hywel Dda University Health Board
GMS PPV Progress Report: 1st April 2022 to 31st March 2023

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

UHB Claim error % Ave	19.74%
Wales claim error % Ave	13.95%
Apr 2022 to 24th Mar 2023 recovery amount	£35,741.66

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	Mar-19	Routine	10.92%	£2,450.47	Apr-22	REVISIT	23.69%	£30,146.23	Nov-22	Routine		Visit file in progress		
Practice 2	Jun-19	Routine	15.59%	£4,189.75	Mar-21	REVISIT	62.95%	£10,431.12	Mar-23	Routine		Visit file in progress		
Practice 3	Jan-20	REVISIT	11.44%	£1,418.92	Sep-21	Routine	8.36%	£937.13	Feb-23	Routine		Visit file in progress		
Practice 4	Jun-19	REVISIT	4.31%	£1,027.95	Jan-22	Routine	2.68%	£440.01	Jan-23	Routine		Visit file in progress		

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 5	Jan-19	REVISIT	8.23%	£5,101.08	Mar-19	Routine	10.92%	£2,450.47	Apr-22	REVISIT	3082	730	23.69%	£30,146.23
Practice 6	Oct-16	Routine	1.24%	£77.92	Feb-20	Routine	4.18%	£2,085.02	Apr-22	REVISIT	1686	211	12.51%	£5,595.43
Practice 7	Mar-15	Routine	1.75%	£47.75	Nov-18	Routine	9.53%	£3,841.49	Aug-22	REVISIT		Visit file in progress		

	Health Board		
	2020/2021	2021/2022	2022/23
Number of practices visited	15	40	7
Amount of claims sampled	7,120	24,687	4,768
Claim errors identified	1306	1940	941
Average claim error rate	18.34%	7.86%	19.74%
Recovery amount	£39,880.65	£62,520.42	£35,741.66

	All Wales		
	2020/2021	2021/2022	2022/2023
Number of practices visited	187	217	38
Amount of claims sampled	85,352	137,118	12,598
Claim errors identified	9,954	17,617	1757
Average claim error rate	11.66%	12.85%	13.95%
Recovery amount	£232,012.10	£370,449.00	£57,691.12

	Health Board - ROUTINE		
	2020/2021	2021/2022	2022/2023
Number of practices visited	8	27	3
Amount of claims sampled	2,214	10,912	0
Claim errors identified	147	417	0
Average claim error rate	6.64%	3.82%	0.00%
Recovery amount	£9,616.41	£14,765.87	£0.00

	All Wales - ROUTINE		
	2020/2021	2021/2022	2022/2023
Number of practices visited	122	138	30
Amount of claims sampled	27,804	43,958	5,732
Claim errors identified	1,635	2,681	377
Average claim error rate	5.88%	6.10%	6.58%
Recovery amount	£68,772.35	£80,442.99	£12,987.92

	Health Board - REVISIT		
	2020/2021	2021/2022	2022/2023
Number of practices visited	7	13	3
Amount of claims sampled	4,906	13,775	4,768
Claim errors identified	1159	1523	941
Average claim error rate	23.62%	11.06%	19.74%
Recovery amount	£30,264.24	£47,754.55	£35,741.66

	All Wales - REVISIT		
	2020/2021	2021/2022	2022/2023
Number of practices visited	65	79	8
Amount of claims sampled	57,548	93,160	6,866
Claim errors identified	8,319	14,936	1380
Average claim error rate	14.46%	16.03%	20.10%
Recovery amount	£163,239.75	£290,006.01	£44,703.20

Hywel Dda University Health Board
GOS PPV Progress Report: 1st April 2022 to 31st March 2023

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

UHB Claim error % Ave	1.94%
Wales claim error % Ave	4.31%
Apr 2022 to 24th Mar 2023 recovery amount	£652.86

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	Nov-12	Routine	0.00%	-£17.40	Sep-15	Routine	0.00%	£0.00	Apr-22	Routine	103	1	0.97%	£20.91
Practice 2	Mar-15	Routine	1.49%	£32.25	Aug-17	Routine	0.00%	£0.00	May-22	Routine	103	2	1.94%	£71.54
Practice 3	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	Apr-22	Routine	103	2	1.94%	£101.13
Practice 4	N/a	N/a	N/a	N/a	N/a	N/a	N/a	N/a	May-22	Routine	103	3	2.91%	£145.24
Practice 5	Sep-16	Routine	1.48%	£67.30	Jul-19	Routine	4.85%	£258.40	Jul-22	Routine	103	4	3.88%	£207.90
Practice 6	Jun-15	Routine	0.00%	£0.00	Jun-18	Routine	0.97%	£20.20	Jul-22	Routine	103	1	0.97%	£63.68
Practice 7	N/a	N/a	N/a	N/a	Apr-17	Routine	0.00%	£0.00	Jul-22	Routine	103	1	0.97%	£42.46

	Health Board		
	2020/2021	2021/2022	2022/2023
Number of practices visited	N/a	0	7
Amount of claims sampled	N/a	0	721
Claim errors identified	N/a	0	14
Average claim error rate	N/a	0.00%	1.94%
Recovery amount	N/a	N/a	£652.86

	All Wales		
	2020/2021	2021/2022	2022/2023
Number of practices visited	N/a	4	30
Amount of claims sampled	N/a	412	2,781
Claim errors identified	N/a	47	120
Average claim error rate	N/a	11.41%	4.31%
Recovery amount	N/a	£1,777.37	£4,753.21

	Health Board - ROUTINE		
	2020/2021	2021/2022	2022/2023
Number of practices visited	N/a	0	7
Amount of claims sampled	N/a	0	721
Claim errors identified	N/a	0	14
Average claim error rate	N/a	0.00%	1.94%
Recovery amount	N/a	£0.00	£652.86

	All Wales - ROUTINE		
	2020/2021	2021/2022	2022/2023
Number of practices visited	N/a	4	30
Amount of claims sampled	N/a	412	2,781
Claim errors identified	N/a	47	120
Average claim error rate	N/a	11.41%	4.31%
Recovery amount	N/a	£1,777.37	£4,753.21

	Health Board - REVISIT		
	2020/2021	2021/2022	2022/2023
Number of practices visited	N/a	0	0
Amount of claims sampled	N/a	0	0
Claim errors identified	N/a	0	0
Average claim error rate	N/a	0.00%	0.00%
Recovery amount	N/a	£0.00	£0.00

	All Wales - REVISIT		
	2020/2021	2021/2022	2022/2023
Number of practices visited	N/a	0	0
Amount of claims sampled	N/a	0	0
Claim errors identified	N/a	0	0
Average claim error rate	N/a	0.00%	0.00%
Recovery amount	N/a	£0.00	£0.00