



PWYLLGOR ARCHWILIO A SICRWYDD RISG AUDIT AND RISK ASSURANCE COMMITTEE

DYDDIAD Y CYFARFOD: DATE OF MEETING:	22 February 2022
TEITL YR ADRODDIAD: TITLE OF REPORT:	Post Payment Verification Report for the period 1 st April 2021 to 31 st December 2021
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 report 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).

The report is intended for information purposes and discussion. PPV provides assurance in all contractor disciplines, except for General Dental Services. At certain times during the COVID-19 pandemic, 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 deliver an agreed level of PPV within the Ophthalmic, Pharmaceutical and Medical disciplines, along with the Clinical Waste Audit.

Cefndir / Background

This year, 2021-2022, we continue to face challenges associated with the COVID-19 pandemic. To effectively respond to challenges identified within Primary Care, we continue to investigate further avenues to enhance our PPV service. The decision to halt physical visits to our contractor premises was taken to protect our front-line services, to maintain colleagues' safety and to remove any pressure on primary care contractors and their teams during difficult times.

A review of opportunities and a recovery plan has been considered during this time, to maintain an excellent level of PPV, which would continue to provide Health Boards with reasonable assurance that public monies are being appropriately claimed.

Asesiad / Assessment

General Medical Services (GMS)

The visit plan runs on a 3-year cycle for GMS and is agreed by Health Board Audit Committees. 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 would take 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 hoping to introduce a pilot for two new service checks by PPV, which are the Quality and Safety Scheme and the Collaborative Working Scheme.

PPV are currently conducting Bonus Payment checks (as requested by Welsh Government) relating to payments claimed and made to all Health Service staff in 2021.

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 Audit & Risk Assurance Committee is requested to note the contents of this report.

Amcanion: (rhaid cwblhau) Objectives: (must be completed)	
Committee ToR Reference: Cyfeirnod Cylch Gorchwyl y Pwyllgor:	3.15 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):	Governance, Leadership and Accountability 7. Staff and Resources
Amcanion Strategol y BIP: UHB Strategic Objectives:	3. Striving to deliver and develop excellent services 6. Sustainable use of resources
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 Termau: 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

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

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

UHB Claim error % Ave	4.51%
Wales claim error % Ave	
2019/20 recovery amount	£16,530.55

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	Oct-14	Routine	1.42%	£100.40	Jan-18	Routine	0.76%	£50.42	Jun-21	Routine	507	6	1.18%	£320.40
Practice 6	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 7	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 8	Dec-17	Routine	4.12%	£743.93	Jul-19	REVISIT	10.55%	£417.76	Sep-21	Routine	325	14	4.31%	£417.76
Practice 9	Mar-18	Routine	1.69%	£202.03	Aug-19	REVISIT	1.34%	£144.68	Jul-21	Routine	569	10	1.76%	£357.36
Practice 10	Mar-15	Routine	0.34%	£7.71	Apr-18	Routine	2.46%	£138.51	Jun-21	Routine	318	19	5.97%	£766.67
Practice 11	Apr-17	Routine	3.43%	£460.08	May-19	REVISIT	23.08%	£811.73	Oct-21	Routine	400	6	1.50%	£414.01
Practice 12	May-18	Routine	2.84%	£295.55	Aug-19	REVISIT	3.28%	£19.60	Dec-21	Routine	Visit file in progress			
Practice 13	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 14	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 15	Dec-18	Routine	5.28%	£704.99	Jan-21	REVISIT	26.47%	£990.00	Aug-21	Routine	440	27	6.14%	£700.59
Practice 16	Nov-15	REVISIT	1.31%	£287.80	Aug-18	Routine	0.73%	£78.94	Aug-21	Routine	497	5	1.01%	£462.22
Practice 17	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 18	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 19	Jan-19	Routine	2.90%	£166.02	Jan-21	REVISIT	0.00%	£0.00	Sep-21	Routine	273	8	2.93%	£470.72
Practice 20	Oct-18	Routine	5.03%	£1,189.79	Feb-20	REVISIT	13.41%	£1,070.00	Sep-21	Routine	Visit file in progress			
Practice 21	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 22	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 23	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 24	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 25	Oct-17	Routine	3.45%	£208.69	Jun-19	REVISIT	4.31%	£1,027.95	Aug-21	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 26	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 27	Jan-18	REVISIT	14.01%	£10,547.09	Mar-19	Routine	11.75%	£1,367.66	Sep-21	REVISIT	Visit file in progress			
Practice 28	Aug-16	Routine	3.49%	£242.20	Jan-20	REVISIT	3.16%	£380.32	Dec-21	REVISIT	Visit file in progress			
Practice 29	Aug-18	REVISIT	2.33%	£167.53	Nov-19	Routine	1.66%	£445.53	Aug-21	REVISIT	37	1	2.70%	£110.00

GMS STATISTICS

	Health Board		
	2019/2020	2020/2021	2021/2022
Number of practices visited	36	15	29
Amount of claims sampled	38,524	7,120	8,807
Claim errors identified	4516	1306	397
Average claim error rate	11.72%	18.34%	4.51%
Recovery amount	£115,710.40	£39,880.65	£16,530.55

	All Wales		
	2019/2020	2020/2021	2021/2022
	234	186	185
	171,919	86,455	52,452
	21,550	9,964	4166
	12.53%	11.53%	7.94%
	£466,107.55	£234,085.37	£129,548.58

	Health Board - ROUTINE		
	2019/2020	2020/2021	2021/2022
Number of practices visited	12	8	25
Amount of claims sampled	16,054	2,214	8,675
Claim errors identified	728	147	362
Average claim error rate	4.53%	6.64%	4.17%
Recovery amount	£18,264.47	£9,616.41	£12,905.55

	All Wales - ROUTINE		
	2019/2020	2020/2021	2021/2022
	129	121	115
	62,694	20,188	26,879
	3,015	1,592	1336
	4.80%	7.89%	4.97%
	£85,165.13	£67,132.94	£58,485.37

	Health Board - REVISIT		
	2019/2020	2020/2021	2021/2022
Number of practices visited	24	7	4
Amount of claims sampled	22,470	4,906	132
Claim errors identified	3788	1159	35
Average claim error rate	16.86%	23.62%	26.51%
Recovery amount	£97,445.93	£30,264.24	£3,625.00

	All Wales - REVISIT		
	2019/2020	2020/2021	2021/2022
	105	70	60
	109,225	59,171	21,943
	18,535	8,372	2306
	16.97%	14.15%	10.51%
	£380,942.42	£166,952.43	£71,063.21

KEY REPORT POINTS

We have representatives from every Health Board in Wales and have set up a newly reformed GMS working Group. These meetings are held monthly 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.

Restarted 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.

To begin 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.

For 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 working on 2 New services checks for Pharmacy in April. These are the Collaborative working Scheme and the Quality and Safety Scheme.