

## **Post-payment verification of community pharmacy Advanced services**

Next month, the NHSBSA will start undertaking post-payment verification of payments to pharmacy contractors for provision of the MUR service. This will involve requesting evidence from a sample of contractors to support payment claims they have submitted for MURs over a specified period. Over time, this work will develop to cover the provision of other Advanced services.

### **Background**

NHS England is responsible for monitoring the provision of Essential and Advanced services by pharmacy contractors and they have a duty to assure themselves of the quality and probity of activity provided under the Community Pharmacy Contractual Framework (CPCF). Until now, this monitoring has been the sole responsibility of NHS England's local teams, however in many areas resource constraints have limited their ability to perform this work, which has resulted in a lack of consistency in how this is carried out across the country.

### **Standardising the approach**

Following a review of internal audits of NHS England's operations, the NHSBSA has been asked to pilot a national process for parts of the post-payment verification and performance management of Advanced services.

This means the NHSBSA will do some of the work previously undertaken by NHS England's local teams; these activities will be described as "provider assurance". Taking a standardised and centralised approach to this work means the variability in the way post-payment verification is currently carried out by NHS England will be removed and all pharmacies will be treated equally and fairly using a consistent, transparent, proportionate and evidence-based approach.

The standardised approach has been agreed by PSNC, NHS England and the NHSBSA. It aims to identify any issues related to the claiming of payment for Advanced services and to facilitate resolution of those issues with the individual contractor. Where common issues are identified, advice will be provided to all contractors on how such issues could be avoided in the future.

### **Proof of Concept**

The new approach will operate for a 6-month period (commencing in October 2017) as a proof of concept pilot to establish a centralised approach and evaluate its effectiveness.

The work will involve requesting supporting information for Advanced services payment claims, where the NHSBSA already has authorisation to use patient records for post payment verification purposes (by virtue of the consent statement agreed and signed by the patient receiving the service).

## **What will this mean for contractors?**

Each month, the NHSBSA will request evidence from a sample of pharmacy contractors to support the payment claims they have submitted for Advanced services over a specified three-month period.

This will start with payment claims for MURs and the evidence requested will be the signed patient consent forms for the service that correspond to the payment claims made. Contractors will be asked to submit the requested forms with their next monthly prescription bundle.

Contractors are reminded that a consent form signed by the patient is a prerequisite for undertaking an MUR. These forms include the permission from the patient that they can be shared with NHS England, the NHS Business Services Authority (NHSBSA) and the Secretary of State for Health to make sure the pharmacy is being correctly paid by the NHS for the service provided.

The process has been designed to be as easy as possible for contractors to provide the evidence, however, if there are any difficulties, the NHSBSA will be on hand to provide assistance to the contractor.

The NHSBSA will review the submitted forms against the payment claims received for the period and will share their findings with the contractor. If there appears to be missing evidence, the NHSBSA will discuss this with the contractor and they will be asked if they can provide alternative evidence that the service was provided.

Once the NHSBSA's findings are agreed with the contractor, information will be shared with the relevant NHS England local team. Where necessary, the local team will contact the contractor to discuss the findings. The consent forms submitted by contractors will be returned to them once the NHSBSA has finished reviewing them.

The potential outcomes of the process are:

1. The evidence provided by the contractor matches the submitted payment claims. No further action is required;
2. The evidence provided and the submitted payment claims do not match and the contractor agrees the payment claim was inaccurate and / or a payment adjustment is appropriate. An adjustment will be made;
3. The evidence provided and submitted payment claims do not match and the contractor believes that the discrepancy may be because of service provision and claims being in different periods (i.e. an MUR has been carried out in one month, but not claimed for until a later month). The contractor will be offered the opportunity to provide evidence for a different time period (up to the 12 months within the financial year);
4. The evidence provided and submitted payment claims do not match (including following outcome 3 above) and no satisfactory resolution is achieved. The

case will be passed to the local NHS England team who will initiate the local dispute resolution process.

Other Advanced services will be included in the process in due course and further information on this will be provided before this phase of the work commences.

### **What do contractors need to do now?**

Contractors may want to review how they currently file signed patient consent forms; if for example, forms are filed alphabetically, by patient surname, a change to filing the forms in chronological order may be worth considering to make retrieval of forms for any specified time period easier, should the pharmacy be selected for participation in this work.

If a pharmacy contractor is selected by the NHSBSA to take part in this work, they will receive a letter which includes full instructions on how to submit the MUR consent forms to the NHSBSA; only pharmacy contractors that are contacted by the NHSBSA need to submit their MUR consent forms.