



Post Payment Verification Progress Report

For the period: 1st April to 30th September 2018

Abertawe Bro Morgannwg University Health Board

Issued: October 2018

Prepared by: Mr Scott Lavender (All Wales PPV Manager)

This document has been prepared for the internal use of ABMU University Health Board.

For any queries or further information relating to this report, please contact Mr Scott Lavender. E-mail: scott.lavender@wales.nhs.uk

1. Introduction

This report has been prepared for the Audit Committee of Abertawe Bro Morgannwg (ABMU) University Health Board. The aim of this report is to summarise the work undertaken by the Post Payment Verification (PPV) department in accordance to the Welsh Assembly Government (WG) directions in respect of General Medical Services (GMS), General Ophthalmic Services (GOS) and General Pharmaceutical Services (GPS).

The purpose of a PPV visit to GMS contractors is to ensure that claims submitted by contractors in respect of GMS Enhanced Services are correct and in accordance with the Statement of Financial Entitlement (SFE) and service specifications set by WG and LHBs.

The purpose of a PPV visit to GOS contractors is to ensure that claims submitted by contractors in respect of GOS are correct and in accordance with the relevant NHS General Ophthalmic Services regulations and any specific LHB procedure.

The purpose of a PPV visit to GPS contractors is to ensure that claims submitted by contractors in respect of GPS are correct and in accordance with the relevant NHS General Pharmaceutical Services regulations and any specific LHB, CPW or WG procedures.

The aim of the PPV process is to ensure propriety of payments of public monies by the LHBs. The probity checks conducted during a PPV visit will provide reasonable assurance to LHBs that public money has been spent appropriately by contractors making accurate claim submissions, contractors internal protocols are clinically sound and services are being claimed for in accordance to clinical specifications.

2. Post Payment Verification process

The PPV department carry out routine visits to all General Practitioner contractors on a three year cycle. During a GMS visit, the PPV department will analyse a sample of 20 claims or 10% of the total number of claims submitted during the year prior to the visit (whichever is the greater) for each enhanced service commissioned to the Practice.

The PPV department carry out routine visits to ophthalmic contractors based on the average number of GOS3 forms submitted during the year. The following table is used in determining the GOS visit schedule in a three year cycle:

Average monthly GOS3 submissions	Number of visits within a three year cycle
Up to 200	1
201 – 400	2
401 – 600	3

During a GOS visit, the PPV department will analyse a sample of 100 claims consisting of GOS1 (Sight tests), GOS3 (Vouchers), GOS4 (Repairs and replacement) and EHEW claims.

The purpose of a GPS PPV audit is to ensure that claims submitted by Pharmacy contractors in respect of GPS are correct and in accordance with the relevant NHS General Pharmaceutical Services regulations and any specific specification set by WG, HB's and CPW.

Following a visit, an initial report is sent to the General Practitioner/ Ophthalmic contractor summarising the observations and findings of the visit and request further information from the contractor to queries that arise from the visit. The contractor is given 28 days to reply to the queries. If no response is received by the contractor, it will be assumed that they are satisfied with the report findings. If the contractor provides feedback, the PPV department will consider this information and assess if it clarifies the queries.

Taking the above into account, the report is finalised with recommended recoveries (If appropriate) and sent to the UHB Finance and Primary Care lead for approval.

If the report is approved, the PPV team will instruct the Payments department within NWSSP Primary Care Services to make the recovery against the contractor.

Where the PPV team identify a high number of claim errors for a particular service (10% for GMS, GOS & GPS), a recommendation will be made to the UHB that a more substantive review of the service needs to be carried out. If this is the case, the PPV team will carry out a revisit to the contractor within one year of the routine visit. During this visit all claims submitted by the contractor for the identified services only will be analysed for the period between the last visit and the routine visit date, usually three years.

In addition to carrying out visits, the PPV team continually monitor claims submitted by GMS, GOS and GPS contractors to assist in the identification of trends and outliers. This information is used to assist in the preparation of visit samples and also to alert the UHB and Local Counter Fraud Specialist if suspicious claiming patterns emerge.

The PPV team are also available to provide advice, support and guidance to contractors and UHBs when required.

3. Summary of findings and observations

General Medical Services

Planned visits	Completed	Visits on-	Total visits	Variance
for UHB	visits	going	carried out	
11	7	4	11	0

During the period 1st April 2018 to 30th September 2018, the PPV team has visited 11 GMS contractors as per the visit plan agreed with the UHB. The PPV team have recovered £1,378.12 from completed visits to GMS contractors in the UHB area due to errors identified in contractor's enhanced service claims. Recoveries are also to be made from on-going visits. These recoveries have not been included in the above total as they have not been authorised by the UHB. A summary of the GMS visits can be found in appendix one of this report.

The overall claim error rate for the locality was 5.58% from all claims sampled. A graphical representation of the claim error rates following GMS visits can be found in appendix two of this report.

A summary of the PPV teams findings from visits by service can be found in **Appendix 1** of this report with a graphical representation of the error rates by service can be found in **Appendix 2**.

General Ophthalmic Services

Planned visits	Completed	Visits on-	Total visits	Variance
for UHB	visits	going	carried out	
8	7	1	8	0

During the period 1st April 2018 to 30th September 2018, the PPV team have visited 8 GOS contractors as per the visit plan agreed with the UHB. The PPV team have recovered £771.30 from completed visits to GOS contractors in the UHB area due to errors identified in contractors' GOS claims. A summary of the GOS visits can be found in appendix three of this report.

The overall claim error rate for the locality was 3.33% from all claims sampled. A graphical representation of the claim error rates following GOS visits can be found in appendix four of this report.

A summary of the PPV teams findings from visits by service can be found in **Appendix 3** of this report with a graphical representation of the error rates by service can be found in **Appendix 4**.

General Pharmaceutical Services

Planned visits for	Completed visits	Visits on- going	Total visits carried out	Variance
UHB				
21	17	4	21	0

During the period 1st April 2018 to 30th September 2018, the PPV team has visited 21 GPS contractors as per the visit plan agreed with the UHB. The PPV team have recovered £3,874.79 from completed visits to GPS contractors in the UHB area due to errors identified in contractor's Medical Review Use claims. A summary of the GPS visits can be found in **Appendix 5** of this report.

The overall claim error rate for the Health Board was 7.94% from all claims sampled.

A summary of the PPV teams findings from visits by service can be found in **Appendix 5** of this report with a graphical representation of the error rates by service can be found in **Appendix 6**.

4. Conclusions and recommendations

Recently an appeal process document was created for a national resolution approach to any contractors who felt the validity of any claims recovered should stand; this has been introduced and embedded successfully.

We have been networking with both Finance staff and Primary Care team to ensure that the service we deliver from PPV is both efficient and effective, whilst also being able to promote other services and tasks we can complete.

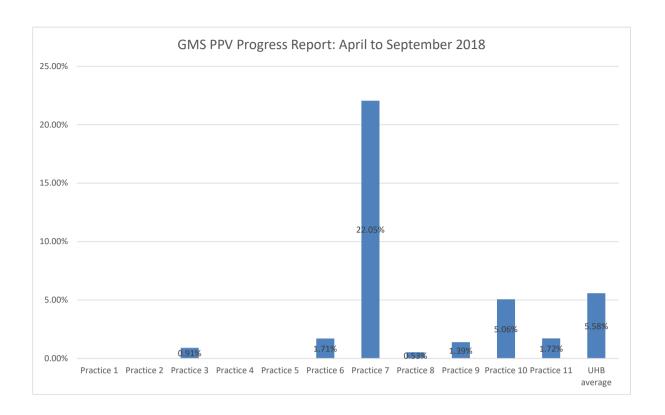
I have developed training packages that can be presented to contractors within the UHB to aid them in the understanding of the PPV process and offer guidance and assistance where requested. PPV staff always try to offer guidance and support during the visit process but we are also willing to do that at any time whether it be via telephone, e-mail or in person.

The PPV team will continue to assist the UHB in providing training, advice or informally meeting with contractors or their staff to discuss PPV related issues.

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Completed GMS visits

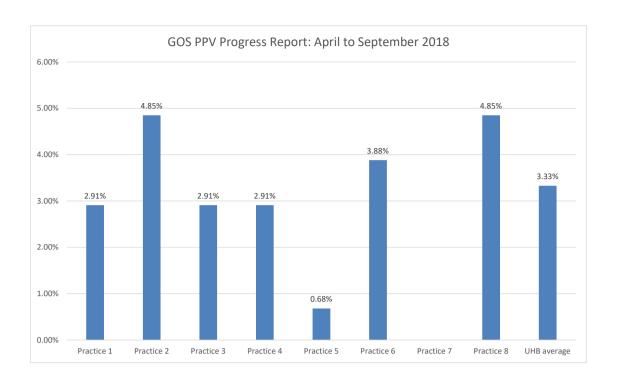
Practice Code	Visit Status	Sample Size (numeric)	Claim errors found (numeric)	Admin error rate %	Claim error rate %	Recovery	Main error areas	
Practice 1	Routine						Visit ongoing, initial report sent to practice	
Practice 2	Routine						Visit ongoing, initial report sent to practice	
Practice 3	Routine	329	3	5.17%	0.91%	£26.80	1 x Simple Wounds and 2 x Men ACWY	
Practice 4	Routine						Visit ongoing, initial report sent to practice	
Practice 5	Routine						Visit ongoing, initial report sent to practice	
Practice 6	Routine	351	6	2.28%	1.71%	£40.38	3 x Shared Care, 2 x Anti-coagulation Monitoring and 1 x Me ACWY	
Practice 7	Routine	331	73	0.60%	22.05%	£1,006.13	2 x Administration of Gonadorelins, 1 x Flu, 3 x Pertussis, 20 x Care Homes, 5 x Homeless, 10 x Shared Care, 4 x Anticoagulation Monitoring, 26 x Warfarin and 2 x Locally Approved Vaccincation	
Practice 8	Routine	189	1	0.00%	0.53%	£103.92	1 x Learning Disabilities	
Practice 9	Routine	216	3	1.85%	1.39%	£54.80	1 x Flu and 2 x Care Homes	
Practice 10	Routine	237	12	3.38%	5.06%	£106.89	9 x Administration of Gonadorelins, 1 x Flu, 1 x Pneumococcal and 1 x Men B	
Practice 11	Routine	174	4	2.30%	1.72%	£39.20	2 x Flu, 1 x Hepatitis B and 1 x MMR	
UHB average		1,827	102		5.58%	£1,378.12		



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Completed GOS visits

Practice Code	Visit Status	Sample Size (numeric)	Claim errors found (numeric)	Admin error rate %	Claim error rate %	Recovery	Main error areas
Practice 1	Routine	103	3	24.27%	2.91%	£56.55	1 x EHEW, 1 x GOS 3 and 1 x GOS 4
Practice 2	Routine	103	5	2.91%	4.85%	£73.20	2 x GOS 3, 2 x GOS 4 and 1 x EHEW
Practice 3	Routine	103	3	21.36%	2.91%	£121.20	3 x EHEW
Practice 4	Routine	103	3	15.53%	2.91%	£179.20	1 x EHEW and 2 x GOS 4
Practice 5	Routine	103	1	3.88%	0.68%	£40.40	1 x EHEW
Practice 6	Routine	103	4	17.48%	3.88%	£120.25	1 x GOS 3 and 3 x GOS 4
Practice 7	Routine						Visit ongoing, initial report sent to practice
Practice 8	Routine	103	5	11.65%	4.85%	£180.50	4 x EHEW and 1 x GOS 4
UHB average		721	24		3.33%	£771.30	



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Completed GPS visits

Practice Code	Visit Status	Sample Size (numeric)	Claim errors found (numeric)	Admin error rate %	Claim error rate %	Recovery	Main error areas
Practice 1	Routine	68	2	17.65%	2.94%	£56.00	2 x MUR
Practice 2	Routine						Visit ongoing, initial report sent to practice
Practice 3	Routine	92	13	8.74%	14.21%	£364.00	13 x MUR
Practice 4	Routine	91	6	3.30%	6.59%	£168.00	6 x MUR
Practice 5	Routine	14	1	35.71%	7.14%	£28.00	1 x MUR
Practice 6	Routine	93	10	87.67%	9.30%	£254.55	8 x MUR and 2 x Flu
Practice 7	Routine	63	1	6.35%	1.59%	£28.00	1 x MUR
Practice 8	Routine	50	0	10.00%	0.00%	£0.00	All claims were verified
Practice 9	Routine	92	0	15.22%	0.00%	£0.00	All claims were verified
Practice 10	Routine	100	0	5.00%	0.00%	£0.00	All claims were verified
Practice 11	Revisit	272	67	21.69%	24.63%	£1,876.00	67 x MUR
Practice 12	Revisit	261	20	17.24%	7.66%	£560.00	20 x MUR
Practice 13	Routine	83	3	15.66%	3.61%	£60.14	1 x MUR and 2 x Flu
Practice 14	Routine						Visit ongoing, initial report sent to practice
Practice 15	Routine	97	2	22.68%	2.06%	£56.00	2 x MUR
Practice 16	Routine	100	0	6.00%	0.00%	£0.00	All claims were verified
Practice 17	Routine	100	6	21.00%	6.00%	£168.00	6 x MUR
Practice 18	Routine	100	3	11.00%	3.00%	£60.10	1 x MUR and 2 x Flu
Practice 19	Routine						Visit ongoing, initial report sent to practice
Practice 20	Routine	100	7	3.00%	7.00%	£196.00	7 x MUR
Practice 21	Routine						Visit ongoing, initial report sent to practice
UHB average		1,776	141		7.94%	£3,874.79	

