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**For the attention of:** Directors of Primary Care  
Directors of Finance  
Heads of Primary Care

20<sup>th</sup> December 2022

Dear Colleague

### **Communication No 26: FPPS – Post Payment Verification**

Since the transition of family practitioner payments away from the National Health Application and Infrastructure Services to Business Services Organisation in Northern Ireland's Family Practitioner Payment System in December 2021, NWSSP's post payment verification service has been largely restricted. It was our intention, agreed with individual health boards, to re-instate the post payment verification service in the second half of 2022/23, and to undertake reviews of 222 practices in 2022/23, with resumption of full reviews from April 2023. Due to difficulties experienced with data collection and submission from practices to NWSSP Primary Care Services using the new system, Primary Care Services is unable to meet this target or deadline.

### **Background**

NHS Digital has traditionally provided the Open Exeter system used for making payments to general practices in Wales, via its National Health Application and Infrastructure Service (NHAIS). On notification of NHS Digital's intention to decommission this system, NWSSP began the process of procuring an alternative system. In April 2020 the contract for provision of this service was awarded to the Business Services Organisation in Northern Ireland, to be delivered via their Family Practitioner Payment System (FPPS), and this became operational in December 2021

Following the implementation of the FPPS, the claims verification process was designed around practices submitting evidence in support of claims via the payment system; and the Payment Team then collating the supporting evidence submitted at the end of each payment cycle (either monthly or quarterly). This is then passed on to the Post Payment Verification Team to form a claim sample for each practice. This sample shows payments made against claims, based on individual NHS numbers, and forms the basis of the post payment verification process.

The claims process in NHS Northern Ireland differs from that in Wales in that there is no requirement for practices to submit evidence to support their claims at the point of claiming, and therefore this not an existing feature within the FPPS.

This was a recognised difference from the outset, and it was hoped that it could be solved through system design changes within the FPPS itself to replicate some of the previous Open Exeter/NHAIS functionality. This allowed for claims to be submitted and then matched directly against NHS numbers provided as evidence within the payment system, resulting in a “cleansed” sample being available to the Post Payment Verification Team.

Unfortunately, despite much work within both Wales and Northern Ireland teams, this has not proved possible. In short, this functionality was never designed to be built into the original system and has proved too problematic to resolve in the way originally anticipated.

As a consequence, the Post Payment Verification Team has been unable to receive collated practice samples and is therefore unable to meet the planned review of 222 practices as anticipated.

## **Assessment**

There are clearly two key risks in the current situation:

1. Errors in claims go undetected and un-reconciled (Finance)
2. NWSSP is unable to meet its post payment verification commitment as agreed with health boards, and submitted to their respective Audit Committees (Reputation)

## **Next Steps**

In order to mitigate the risks noted above, NWSSP Primary Care Services will:

- a) Suspend all GMS Post Payment Verification reviews for the remainder of 2022/23. Restarting them fully again from April 2023 when the actions noted below are operational. Ophthalmic and Pharmacy reviews will continue as planned during this period.
- b) Establish an in-house Reconciliation System that replicates, as far as practicable, the original Open Exeter cleansing process that links claims submitted by practices to NHS numbers. This will be operational from 3<sup>rd</sup> January 2023. Review all claims data from October 2021 to September 2022, through the Payment Team, using the in-house Reconciliation System to provide verification of all payments made during that period. This process will be subject to Internal Audit review to assure effectiveness. Claims from October 2022 onwards will not need to be reviewed retrospectively as they will have been processed through the Reconciliation System directly.

- c) Work with health boards and practices to ensure clarity around the process for monthly and quarterly claims submission, as both are achievable via the system (54% of practices currently submit data monthly).
- d) Establish communications with health boards and practices to explain the current situation and plans.

Please contact me using the details provided at the top of this letter if you would like to discuss this further.

Yours sincerely



**Andrew Evans**  
**Director of Primary Care Services**

cc GPC Wales

Communications record:

No:	Recipients:	Subject:	Released:
-	DoPC, HoPC, CPW, OW, GPCW	Changes to Contractor Payments	November 2020
-	DoPC, HoPC, DoFs, GP Practices, GPC Wales	New GP Payment System	February 2021
1	All GP Practices, cc all Health Boards	System Access	March 2021
2	All GP Practices, cc all Health Boards	System Access – Reminder	April 2021
3	All GP Practices, cc all Health Boards	System Access – Final Reminder	July 2021
4	GPC Wales, DoPC, HoPC, DoFs	Update on progress/transition timescale	October 2021
5	All GP Practices, cc HoPC, Primary Care Mgrs	Timetable and schedule of workshops	October 2021
6	All GP Practices, cc HoPC, Primary Care Mgrs	Cancelling scheduled workshops	October 2021
7	All GP Practices, cc HoPC, Primary Care Mgrs	Revised schedule of workshops	November 2021
8	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS Access to FPPS Landing Page, etc	November 2021
9	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS Reminder to access to FPPS, etc	November 2021
10	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS Live	December 2021
11	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS – Access to the Live System	December 2021
12	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS – System Issues	January 2022
13	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS – Update	January 2022
14	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS - ACTION REQUIRED	February 2022
15	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS – Training	March 2022
16	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS – Training Cancelled	March 2022
17	All GP Practices, cc HoPC Primary Care Mgrs	FPPS – Training Cancelled	March 2022
18	All GP Practices, cc HoPC Primary Care Mgrs	FPPS – Training Schedule	March 2022
19	All GP Practices, cc HoPC Primary Care Mgrs	FPPS – Critical System Failure	April 2022
20	All GP Practices, cc HoPC Primary Care Mgrs	FPPS – Statements	May 2022
21	All GP Practices, cc HoPC Primary Care Mgrs	FPPS – Statements	May 2022
22	All GP Practices, cc HoPC Primary Care Mgrs	PPV – Urgent Action Required	June 2022
23	HoPC, DoFs, GPC Wales	PPV Schedule 2022/23	June 2022
24	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS – ES Evidence Upload workshops	July 2022
25	All GP Practices, cc HoPC, Primary Care Mgrs	FPPS Update and Drop In Sessions	September 2022