

Post-payment verification of General Ophthalmic Services Wessex Pilot Area Briefing

Background

NHS Business Services Authority (NHSBSA) will soon be launching a pilot which aims to introduce a national standardised approach to Ophthalmic Post Payment Verification (PPV).

This pilot has been initiated due to variations and inconsistencies in approach to Ophthalmic PPV across England. The pilot will be delivered on behalf of NHS England by NHSBSA, who have a proven track record in delivering similar services for Pharmacy and Dentistry.

NHSBSA has been working closely with the NHS England Central Team, NHS England Direct Commissioning Offices (DCOs) and Professional Bodies to develop a process which is nationally consistent, fair and robust. The overarching aim of the pilot will be to provide assurance to NHS England that claims are being made appropriately. The pilot will be delivered in line with the NHS England Eye Health Policy Book and General Ophthalmic Services (GOS) regulations and will provide education and support to GOS Contractors on submitting accurate claims. Each month NHSBSA will select a number of GOS Contractors to take part in the PPV exercise, based upon a standardised sampling methodology. For each contractor selected, NHSBSA will check a sample of their GOS submissions against evidence presented by the contractor to provide assurance to NHS England that claims are being made appropriately. In the event that an inappropriate claim is discovered a dialogue will be established with the contractor to try and find a way of evidencing the appropriateness of the claim. If the claim cannot be evidenced, then the payment will be recovered. In cases where the evidence is sufficient but there are learning or improvement opportunities for the contractor, the NHSBSA Ophthalmic Provider Assurance team may provide additional advice and guidance.

A diagram outlining the proposed process can be found as an appendix to this briefing.

The pilot will take place in West Yorkshire and Harrogate as well as Wessex and is expected to commence in June 2018, running for six months. The pilot will then be evaluated, with a view to developing a business case for a national rollout.

How will the pilot work?

Each month NHSBSA will select a sample of GOS Contractors to take part in the PPV exercise, based upon a standardised sampling methodology. For each contractor selected, NHSBSA will check a sample of their GOS submissions against clinical evidence to provide assurance to NHS England that claims are being made appropriately. In the event that an inappropriate claim is discovered a dialogue will be established with the contractor to try and find a way of evidencing the appropriateness of the claim. If the claim cannot be evidenced then the payment will be recovered. In cases where the evidence is sufficient but there is learning or improvement opportunities for the contractor, the NHSBSA Ophthalmic Provider Assurance team may provide additional advice and guidance.

What is the pilot trying to achieve?

The key aims of the Ophthalmic Provider Assurance pilot are as follows:

- Provide assurance to NHS England that GOS Contractors are appropriately claiming for activities carried out under the GOS contract.
- Provide assurance services to the NHS which are fair, consistent, transparent, proportionate and delivers improved value for money and quality.
- Provide education and support around submitting appropriate claims, to encourage and promote compliance to GOS regulations.
- Embed the service to ensure it remains appropriate and has the ability to adapt and improve as it evolves.

What does this mean for GOS Contractors?

GOS Contractors will be selected to take part in a PPV exercise via a standardised sampling process, which will involve NHSBSA carrying out statistical analysis of GOS claims to identify outliers. This in itself is not cause for concern, as there may be valid reasons for why a practice is an outlier. In addition to contractors selected as outliers, there will be a number of contractors selected randomly.

If you are selected to take part in the PPV exercise, the OPA team will make an introductory phone call. Following this you will be sent a letter that will clearly outline what evidence will be required to verify the sample of your GOS claims that the OPA Team is reviewing. You will be asked to send this evidence to NHSBSA either via email or via the post. Sending evidence remotely is more efficient and will help contractors to avoid the impact of a site visit. However, if you are unable to submit evidence remotely, a site visit can be arranged by NHSBSA to view the evidence.

The OPA team will then review the evidence, with input from the DCO's clinical advisors. If the evidence supports the GOS claims, then the PPV process will end and you will be sent a report outlining the findings of the PPV process.

If any evidence is discovered to be incomplete or missing then the OPA team will contact you for additional evidence. If evidence cannot be produced, or if a clinical review discovers that the evidence does not justify the GOS claim, then that payment will be recovered. In cases where the evidence is sufficient but there is learning or improvement opportunities for the contractor, the OPA team may provide additional advice and guidance.

Once the evidence has been reviewed you will be sent a report outlining the findings of the PPV exercise.

If you are unhappy with the outcome of the PPV exercise you will be able to appeal the outcome through the appeals process outlined in the NHS England Eye Health Policy Book, which can be found here: <https://www.england.nhs.uk/commissioning/primary-care/optometry/>

What will happen next?

The pilot is due to commence in June 2018, with PPV exercises taking place on a monthly basis for six months. If you are selected to take part in a PPV exercise, NHSBSA will contact you by telephone to discuss what is required. Following the telephone call you will be sent a letter from NHSBSA. The pilot will then be evaluated, with a view to developing a business case for a national rollout. Your views on the pilot will be sought to help inform the evaluation.

For further information please see the website:

<https://www.nhsbsa.nhs.uk/ophthalmicproviderassurance>

If you have any questions relating to the pilot please contact the following:

NHSBSA: nhsbsa.ophthalmicproviderassurance@nhs.net

Local NHS England DCO: england.wessexoptometry@nhs.net

Alternatively please consult the Optical Confederation:

Association of British Dispensing Opticians (ABDO)

Contact: bduncan@abdolondon.org.uk

Association of Optometrists (AOP)

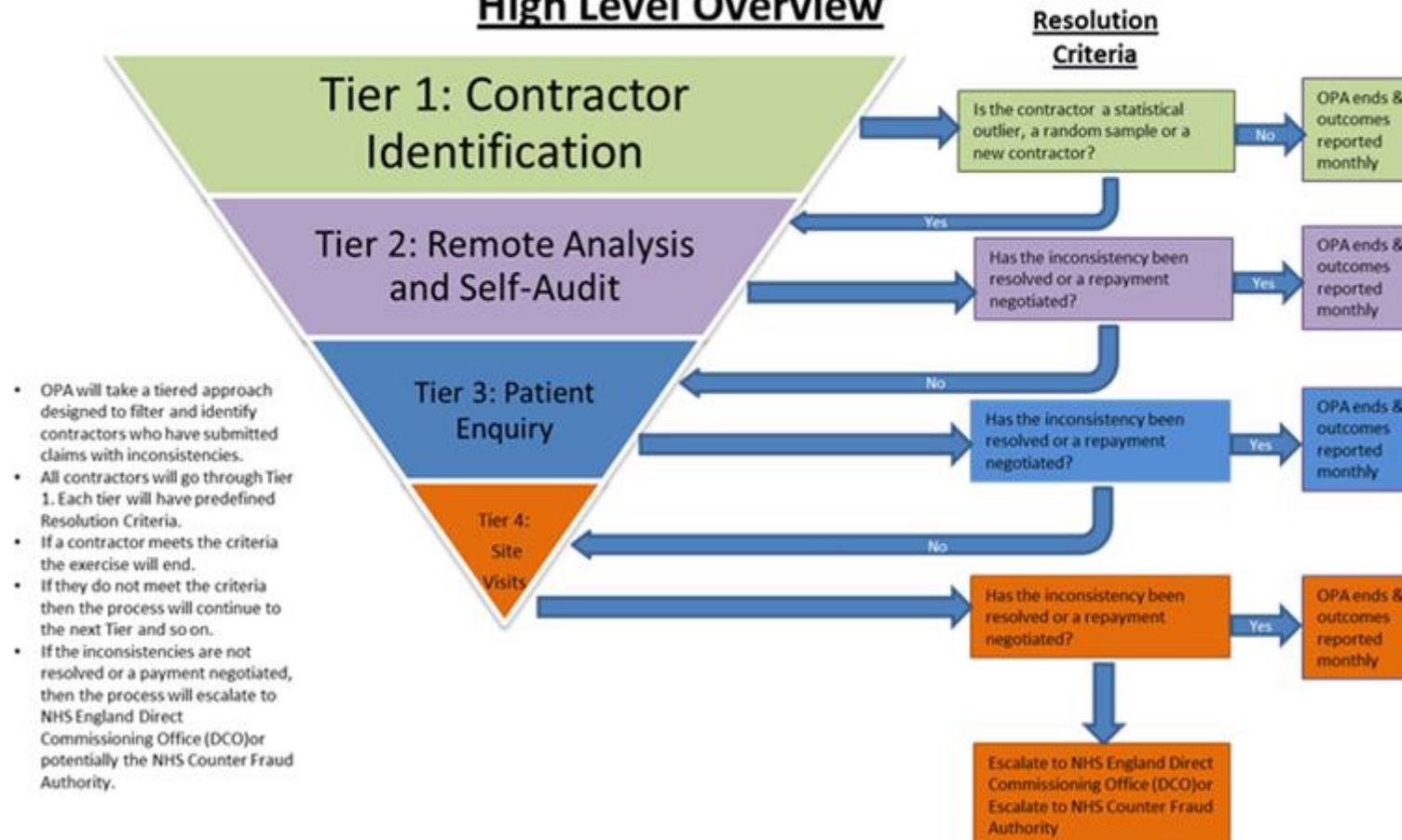
Contact: regulation@aop.org.uk

Federation of (Ophthalmic and Dispensing) Opticians (FODO)

Contact: optics@fodo.com

Ophthalmic Provider Assurance (OPA)-

High Level Overview



- OPA will take a tiered approach designed to filter and identify contractors who have submitted claims with inconsistencies.
- All contractors will go through Tier 1. Each tier will have predefined Resolution Criteria.
- If a contractor meets the criteria the exercise will end.
- If they do not meet the criteria then the process will continue to the next Tier and so on.
- If the inconsistencies are not resolved or a payment negotiated, then the process will escalate to NHS England Direct Commissioning Office (DCO) or potentially the NHS Counter Fraud Authority.