

NHSBSA Dental Provider Assurance Year-End Reconciliation 2019/20 (COVID-19 response) for Orthodontic PDS Agreements

Introduction

As you know NHS Business Services Authority (NHSBSA) Provider Assurance (Dental) deliver the Year-End Reconciliation for specialist orthodontic PDS agreements, on behalf of NHS England and NHS Improvement.

We understand the challenges that the Covid-19 outbreak has placed on dental contractors, so are taking this opportunity to keep you updated on how we're implementing NHS England and NHS Improvement's Year-End Reconciliation process for 2019/20.

This document will be updated in line with any new guidance from NHS England and NHS Improvement and made available on the [NHSBSA website](#).

What's changed?

NHS England and NHS Improvement's [letters to all providers on 25 March 2020 and 15 April 2020](#) specified some changes to the 2019/20 Year-End process Reconciliation and acknowledged that in most years dental activity is higher during the month of March. This year, however, the majority of contractors will have felt the impact of COVID-19.

To recap, the initial letter specified a methodology for calculating the 2019/20 Year End process:

- *“For the purposes of calculating year end contract delivery, we will consider the year to be March 2019 – February 2020, and we will apply March 2019 data instead of March 2020;*

The letter issued on 15 April 2020 provided further clarification, and recognised March 2019 would not necessarily be representative of a typical year end month:

“A number of practices have queried the application of the March 2019-February 2020 activity period for the purposes of calculating 2019/20 contract reconciliation. This is a particular issue where activity levels in March 2020 had been anticipated to be higher than March 2019, or where the practice had opened after 1 March 2019. In recognition of these circumstances, practices may agree with their commissioner to use the following activity from the Compass system as the basis for 2019/20 contract reconciliation:

a) 11 months April 2019 to February 2020

plus

b) in agreement with commissioners, an additional month that may be one of:

- *March 2019 (default)*
- *March 2020 or*
- *average UOA delivery over an appropriate three-month period in 2019/20 agreed with their commissioner.*
- *For contracts delivering above 96% over this period we will then operate normal year end reconciliation with the ability to carry forward activity to 2020; and*
- *For contracts delivering below 96% over this period we will enter into normal clawback position up to 100% of total contract value (TCV)."*
- *Any clawback repayments relating to contract year 2019/20 may be payable over the financial year, with full balance payable by 31 March 2021"*

How does this affect you?

Activity data

The NHSBSA will continue to work with NHS England and NHS Improvement and your local commissioning team to reconcile your contract. The Year-End data will be available from 1 July 2020 onwards. Once this data is available, we will be able to identify the financial position that does not disadvantage you in performance terms, in agreement with your local commissioner.

Option 1- March 2019- February 2020

Calculation of year end contract delivery for March 2019 to February 2020. For March 2019 this includes activity started in March 2019 and completed and scheduled by June 2019. For February 2020 this includes activity completed in February 2020 and completed and scheduled by June 2020. As per NHS England and NHS Improvement's email to Providers on 22 April 2020, it has been agreed that the two-month rule, for the submission of FP17Os, has been relaxed for this short period, to ease the administrative burden on practices.

Option 2- April 2019- March 2020

This will include activity submitted up to and including the June 2020 Schedule. For example, completed courses of Orthodontic treatment for March 2020 submitted by 23 June 2020 will be included.

Option 3- 11 months April 2019 to February 2020 plus an average UOA delivery over an appropriate three-month period

The NHSBSA will identify the best three consecutive months by mutual consent in 2019/20 financial year, that reflects the preferential trend and the average monthly activity for that period will then be applied.

Local flexibility can be applied if the provider can evidence that they had case starts planned during the last 6 working days in March 2020. In such scenarios the local region may decide to include these in the year-end figures¹. Providers are to send this evidence if applicable to nhsbsa.dentalcases@nhs.net after the year-end letter is published in Compass.

¹ Commissioners to ensure that local processes are in place for year end reconciliation to track these treatment starts and ensure no double counting should this flexibility be utilised

Following the orthodontic procurement there will be a number of new contracts that have a start date of the 1 April 2019 and do not have any March 2019 activity. In such cases options 2 and 3 will be considered.

It will be clear in your Year-End Reconciliation letter which option has been used to calculate your 2019/20 final year end position.

Once your Year-End Reconciliation letter has been published in Compass towards the end of July 2020, if you have any queries please continue to contact us via the email address below.

Evidence data – We would advise you continue to keep accurate records of activity regarding any work you are undertaking at this time as this may have an impact on your year end 2020/21 reconciliation.

Triaging data - In response to Coronavirus (COVID-19), remote consultation and triaging systems have been adopted by dental practices under the instruction of NHS England and NHS Improvement.

To help dental practices record telephone triaging data, we've developed a COVID-19 triage form in Compass. Further information can be found here <https://www.nhsbsa.nhs.uk/compass>

In addition to the submission of the triaging data dentists are expected to maintain clinical records as normal following remote triage. This should include information on assessment, necessary self-care advice and appropriate prescriptions for analgesics and/or antimicrobials by telephone.

Urgent Dental Care data

For orthodontic practices operating Urgent Dental Care centres it is important that we capture timely activity during the COVID-19 pandemic. We therefore request that all FP17O data is transmitted within a maximum of 5 working days of completion.

Workforce data

Orthodontic Dental Providers will also be expected to submit a monthly return for activity undertaken by staff working on PDS agreements. This report should be submitted once a month, for the previous month and information can be found here: <https://www.nhsbsa.nhs.uk/compass>

Services included – As per previous years, we will reconcile units of orthodontic activity, that were contracted for the 2019/20 financial year. Contracted services that ended on or before 31 March 2019 will not be included.

Financial values – Any recovery and/or payment for over performance will be calculated at year end using 2019/20 values (the value of contracted activity divided by the number of units of activity delivered).

Financial recovery - Where recoveries are required, the value of under-delivered activity will be recovered by six instalments instead of three. This will commence with your scheduled Compass payment on 1 October 2020 (September schedule). Year-End

Reconciliation letters will be published in Compass at the end of July 2020, if you are happy with your year-end position and contact us before August cut-off date, we may be able to extend this to seven months.

If you believe you have under delivered your contract for the 2019/20 financial year and wish to make voluntary payments towards your reconciliation, please contact us at the email address below.

Force majeure – NHS England and NHS Improvement have instructed NHSBSA that applications for dental relief related to COVID-19 will not be approved for year-end 2019/20.

NHS England and NHS Improvement [letters to all providers on 25 March 2020 and 15 April 2020](#) set out the mechanism by which the financial reconciliation will operate in relation to the 2019/20 financial year in order to mitigate the impact of COVID-19 for providers.

That is not to say COVID-19 is not a Force Majeure issue but in using the most appropriate March position that does not financially disadvantage you, we are trying to alleviate the delivery issues you have faced. If you consider that your circumstances fall outside of the provisions of the letters or do not relate to COVID-19 then you should re-submit your claim for Force Majeure.

Where such applications have been received, for completeness we will respond to contractors and close the application.

Force majeure applications *not* related to COVID-19 should continue to be notified to NHSBSA and will be considered as usual. We will send out applications for dental relief in May 2020, where there has been a relevant notification.

Contact us

While our working arrangements have changed, please be assured we are committed to supporting you. Contact us via nhsbsa.dentalcases@nhs.net

This document refers to COVID-19 and the impact it has on the Year End Reconciliation process for 2019/20. You can find more information on our usual operating processes and guidelines on our [website](#) and [ask us](#).