

GENERAL DENTAL SERVICES: FINANCIAL SUPPORT SCHEME (GDS FSS): FREQUENTLY ASKED QUESTIONS (V1.3 – 12 May 2020)

ELIGIBILITY

1. Who is eligible for the scheme?

All General Dental Practitioners (GDPs) who would have undertaken GDS activity in the absence of the COVID-19 pandemic are eligible for the scheme, provided that they were on the dental list before 9 April 2020.

PAYMENTS

2. How will FSS payments be calculated?

Firstly, if possible, a Baseline Assessment Year average is devised and the worked examples in Annex A illustrates how this average is calculated under 4 different scenarios. The 2019/20 financial year is the best indication of the expected level of activity for GDPs in the absence of the pandemic and is in line with the approach adopted in the rest of the UK.

Under the worked example for the standard approach:

Baseline Assessment Year 2019/20 Item of Service average (including Patient Contributions) = **£9,000**

Item of Service Activity Claims (including Patient Contributions) in May 2020 = **£1,500**

Using the figures above for the purposes of this example the following process is then followed.

1. The IoS claims for the current month (including patient contributions) are deducted: $£9,000 - £1,500 = £7,500$.
2. The remaining £7,500 is abated by 20% to reflect variable costs that will not be incurred: $£7,500 \times 80\% = £6,000$.
3. The £6,000 is increased by 2.7% to reflect the intended 2019/20 GDS pay uplift: $£6,000 \times 1.027 = £6,162$.
4. Leaving a FSS Payment of £6,162.

The normal payments in respect of IoS claims for activity undertaken throughout 2020/21 will continue to be paid and will not be subject to abatement.

If the level of IoS claims by a GDP for a given month in 2020/21 is greater than the monthly average for 2019-20 then no additional support payment would be made.

These rules are subject to change.

5. How will Items of Service (IoS) payments be calculated for GDPs whose circumstances have changed during the calculation period?

We know that not every GDP will have a stable 12 month, reliable activity level upon which to base payments. You may have been on sick leave, maternity leave, have recently commenced a different working pattern, are new contractors, or have worked across different practices over the year. We have listed the approach to each set of circumstances below.

These rules are subject to change.

Maternity or long-term sick leave during 2019/20

If you have been on maternity leave or long-term sick leave, the months during which you received a maternity or long-term sick leave payment are discounted; the remaining lowest month is also discounted and your payment is calculated using an average of the remaining months.

For cases where there are fewer than 3 months data for the GDP during 2019/20, the case will be looked at on an individual basis with the backstop payment, set out below, to apply initially if required.

GDPs moving between practices during the Baseline Assessment Year (2019/20)

A GDP who has moved to a new practice during the Baseline Assessment Year will normally have their payment based on the GDP's earnings in their present (new) practice (amongst other things, this is to ensure that a GDP who has moved from a high to a low-Health Service earning practice is not overpaid, or from a low to high earning practice is not underpaid). The lowest month will also be discounted.

Where there are fewer than 3 months data for the GDP in the new practice, the earnings of the GDP in their previous practice may be used for the determination of financial support. However, factors such as the practice profiles of both old and new practices and contracted hours in both old and new practices will be considered before making that determination to ensure that it is fair and reasonable.

A GDP who is a practice owner cannot claim a financial support payment for loss of earnings because of a vacancy in their practice.

Other GDPs with less than 12 months data

For these GDPs, an average of the available data, discounting the lowest month, will be used to determine the payment.

GDPs without historic earnings or new to the workforce

It is recognised that some GDPs may have no payments in 2019/20; perhaps because they are new to the Dental List or they have returned after an absence of 12 months or

more. Such GDPs would be expected to provide evidence that they would have been providing dental activity in the absence of COVID-19 and the level of such activity.

These GDPs will initially receive the backstop payment, outlined below, whilst the evidence is being considered. If the evidence is not provided or is insufficient, the backstop payment will also cease.

This approach does not apply to GDPs that were not on the dental list before 9 April 2020. These GDPs are ineligible for the scheme.

6. How is the backstop payment calculated?

The backstop is designed to be a temporary measure to ensure that GDPs have an interim form of support payment. The backstop will be applied when it is not possible to make a reliable initial assessment of the GDPs average monthly IoS payment in 2019/20, for example because of a lack of data or a significant variation in monthly payment levels across the year that is not addressed by the approaches set out above.

The backstop will apply for the period of time required for a GDP's case to be considered in more detail.

The backstop payment is £4,247, which is 70% of average GDP 2019/20 IoS payments. Any IoS payments during 2020/21 will be deducted from the backstop payment.

Once a final determination has been made in respect of the most appropriate figure for a GDP's monthly average IoS payment in 2019/20, this will be applied in the subsequent months FSS payment with a reconciliation made in respect of the backstop payment(s) made previously.

7. How long will the scheme payments continue?

The duration of the impact of the COVID-19 pandemic on dental activity levels remains uncertain. Therefore it is not possible to indicate how long the financial support arrangements will be in place.

The intention is that GDPs will be informed one month in advance of the arrangements ending.

8. How do I apply?

The nature of the scheme means that it will be necessary for GDPs to apply for the support payment rather than being automatically enrolled. In addition, there is expected to be a need to refine and amend the approach as more information becomes available which means that this approach should be repeated each month.

GDPs should submit their applications by the 7th of each month.

PAPER SUBMISSIONS ARE NOT PERMITTED.

9. Are Patient Contributions included in the calculation of the support payment?

Yes, with a 20% abatement to reflect variable costs that will not be incurred.

10. Can I apply to other government support schemes in addition to the GDS FSS?

The GDS FSS is to support HSC activity only and if you are in receipt of it no further government support should be applied for in respect of your HSC activity. Duplication of support is not permitted.

However there are clearly issues for private practices and mixed practices.

The eligibility criteria and conditions for the wider business support schemes that have been established in response to the COVID-19 pandemic are not the responsibility of the Department of Health (DoH) in Northern Ireland. However, GDPs wishing to claim for support from such schemes should ensure that this is in relation to private activity only.

To ensure that this is the case your monthly application must include details of all applications and awards from other sources of business support from government. Failure to do so may lead to a loss of eligibility to the GDS FSS and recovery of funding already provided.

If it is evident that payment has been received from a wider business support scheme in respect of both private and HSC activity then it may be necessary to make an adjustment to the GDP support payments. This adjustment would be based on the amount of support received from the wider business scheme and the private/HSC split in income from a GDPs most recent DA1 submission.

11. Can I furlough staff?

The Coronavirus Job Retention Scheme (CJRS) is administered by HMRC and is not the responsibility of the DoH in Northern Ireland.

However, additional support should not be sought from the CJRS in respect of staff whose costs are being covered by the support payments to GDPs.

12. Are there conditions attached to the scheme?

Yes, these are outlined on the e-application form and are listed on the HSCB website, e.g. operating in line with advice from the HSCB / making monitoring returns / assisting the wider HSC etc. Failure to meet these conditions may lead to a loss of eligibility to the GDS FSS and recovery of funding already provided.

13. Is there an appeals process?

In light of the short period of time available it is not possible to design a scheme which covers the particular circumstances of all individual GDPs.

In the context that the scheme is voluntary with a need to have the minimum amount of administration possible, it is intended that there will no appeal process available in respect of the level of monthly support payments.

However ongoing engagement with the industry will be key to ensure we have a scheme that is as fair as possible.

14. Will allowances continue to be paid?

The following allowances will continue to be paid in line with the normal approach:

- Practice Allowance;
- Continuing Care;
- Capitation
- Seniority;
- Vocational Training;
- Trainers Grant;
- Trainee Salary & NINO Contributions;
- Maternity Benefit;
- Rates Reimbursement;
- Quality Assurance; and
- Oral Surgery Specialist Allowance.

The patient registration period for patients will be extended by 3 months which will address the issue of patients unintentionally dropping off the register.

15. What if I am on maternity leave or sick leave?

If you are on maternity, paternity or sick leave, you are not eligible for the scheme, but your payment arrangements will continue. You should continue your maternity leave as planned.

16. When will the 2019/20 SDR increase be actioned?

The development of the COVID-19 GDP financial support arrangements has delayed the implementation of the Minister of Health's decision to apply the DDRB recommendations through a 2.7% increase in the rate of payment for items under the Statement of Dental Remuneration (SDR).

However, the 2.7% increase will be applied to the 2019-20 monthly average payment levels when calculating the level of additional support payment, to reflect the Minister's decision.

Action to implement the SDR in respect of 2019-20 payments will take place as soon as possible.

17. Will payments be recovered?

There is the potential for a spike in activity following the outbreak which would result in a boost in IoS payments for 2020-21 compared to what they would have been in the absence of the pandemic.

If this is found to be the case there may be a need for some of the support to be recovered if there is a significant increase in activity compared with previous years.

This remains uncertain, will be monitored and further details will be developed by the DoH in due course.

18. How are the incomes for those GDPs that finished their foundation year in 2019 being calculated?

The payments for these GDPs will be calculated the same as for GDPs with less than 12 months payment data. See Question 3 for more details.

19. Will superannuation be applied to the FSS payments?

This matter remains under review and further details will be provided as soon as possible.

20. Why have my payments changed from April 2020 to May 2020?

Although the overall policy has remained the same, there are a number of reasons why the level of FSS payment received by a GDP in May 2020 may be different from April 2020. In the first instance, the FSS payment will have increased in response to a reduction in the level of payment received this month in respect of normal Item of Service payments. In addition, the change in approach to the calculation of FSS payments for those who were on maternity or long-term sick leave in 2019/20 will have increased the level of FSS payments for many of those affected. There may also be a change in the level of payment for those GDPs whose individual circumstances were being reviewed.

Furthermore, the initial approach to calculating FSS payments was implemented at short notice to enable payments to be made in April. This did not provide sufficient time to quality assure and test the approach, to ensure that it was fully consistent with the policy objectives, as the focus was on ensuring that there was not an interruption in GDS payments. Although broadly in line with the intended level of support, this meant that some GDPs received more than they should in the April payment whilst others received less.

Following a review of the process of calculating the April 2020 FSS payments, the steady state approach set out above will apply in respect of the May payments and for the remainder of the scheme. It should be made clear that there has been no change in the policy objectives for the scheme.

The April 2020 payment will be reconciled as part of the June 2020 GDS payments in full for those who will now receive a higher level payment under the steady state approach. The reconciliation of the April 2020 payment for those who will receive a lower payment under the steady approach will take place over three months, also beginning in June. This is in line with the requirements under Annex A.4.11 of Managing Public Money NI.

21. Who should I contact for more information?

To maximise system efficiency GDPs should, in the first instance, check if their query is answered in these FAQs. Only if it is not, should they submit an email query, which must include their DS number, to GDS.Correspondence@hscni.net Queries which do not include the DS number will be returned with a request to include this information.

As you will appreciate both the HSCB and the BSO are receiving a significant amount of correspondence at a time of reduced capacity and challenging circumstances. It may not be possible to deal with all queries individually and as quickly as we would like.

Queries are being grouped together based on the core issue with a response to each group of similar questions being added to this FAQ list.

Your patience and cooperation at this time is very much appreciated.

WORKED EXAMPLES

1. Standard Approach

MONTH	IoS Activity Payments (including patient contributions)
Apr-19	£8,000
May-19	£7,000
Jun-19	£12,000
Jul-19	£8,500
Aug-19	£9,000
Sep-19	£7,500
Oct-19	£13,000
Nov-19	£8,000
Dec-19	£9,500
Jan-20	£6,000
Feb-20	£11,000
Mar-20	£8,500
SUB-TOTAL	£108,000
1/12th	£9,000

2020/21 IoS Activity Claims (including patient contributions)	£1,500
--	---------------

The average based on 2019/20 data is calculated = £9,000.

The IoS claims for the current month (including patient contributions) are removed:
 $£9,000 - £1,500 = £7,500$.

The remaining £7,500 is abated by 20% to reflect variable costs that will not be incurred: $£7,500 \times 0.8 = £6,000$.

The £6,000 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£6,000 \times 1.027 = £6,162$.

FSS Payment: £6,162.

2. Maternity or Long-term Sick Leave during Baseline Assessment Year

MONTH	IoS Activity Payments (including patient contributions)
Apr-19	£8,000
May-19	£7,000
Jun-19	£12,000
Jul-19	£1,200
Aug-19	£950
Sep-19	£500
Oct-19	
Nov-19	
Dec-19	
Jan-20	£6,000
Feb-20	£11,000
Mar-20	£8,500
SUB-TOTAL	£46,500
Average	£9,300
2020/21 IoS Activity Claims (including patient contributions)	£1,500

The green cells represent months where a maternity or long-term sick leave payment was made. These are discounted. The yellow cell represents the remaining lowest month. This is also discounted and an average of the remaining 5 months is calculated. £9,300.

The IoS claims for the current month (including patient contributions) are removed:
 $£9,300 - £1,500 = £7,800$.

The remaining £7,800 is abated by 20% to reflect variable costs that will not be incurred: $£7,800 \times 0.8 = £6,240$.

The £6,240 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£6,240 \times 1.027 = £6,408.48$.

FSS Payment: £6,408.48.

3. GDP Moved Practice during Baseline Assessment Year

MONTH	IoS Activity Payments (including patient contributions)
Apr-19	£8,000
May-19	£7,000
Jun-19	£12,000
Jul-19	£8,500
Aug-19	£9,000
Sep-19	£7,500
Oct-19	£13,000
Nov-19	£8,000
Dec-19	£9,500
Jan-20	£6,000
Feb-20	£11,000
Mar-20	£8,500
SUB-TOTAL	£37,000
Average	£9,250

2020/21 IoS Activity Claims (including patient contributions)	£1,500
--	---------------

The green cells represent 7 payments in the old practice. These are discounted. The yellow cells represent 5 payments in the new practice. From these the lowest payment is discounted and the remaining 4 payments are averaged. £9,250.

The IoS claims for the current month (including patient contributions) are removed:
 $£9,250 - £1,500 = £7,750$.

The remaining £7,750 is abated by 20% to reflect variable costs that will not be incurred: $£7,750 \times 0.8 = £6,200$.

The £6,200 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£6,000 \times 1.027 = £6,367.40$.

FSS Payment: £6,367.40.

4. GDP has less than 12 months data during Baseline Assessment Year

MONTH	IoS Activity Payments (including patient contributions)
Apr-19	
May-19	
Jun-19	
Jul-19	
Aug-19	
Sep-19	
Oct-19	
Nov-19	£3,000
Dec-19	£9,500
Jan-20	£6,000
Feb-20	£11,000
Mar-20	£8,500
SUB-TOTAL	£35,000
Average	£8,750

2020/21 IoS Activity Claims (including patient contributions)	£1,500
---	--------

The green payment is the lowest and is discounted. The remaining 4 payments are averaged to get £8,750.

The IoS claims for the current month (including patient contributions) are removed:
 $£8,750 - £1,500 = £7,250$.

The remaining £7,250 is abated by 20% to reflect variable costs that will not be incurred: $£7,250 \times 0.8 = £5,800$.

The £5,800 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£5,800 \times 1.027 = £5,956.60$.

FSS Payment: £5,956.60.

DOCUMENT CONTROL

Version	Date	Author	Changes
1.0	7 April 2020	Michael O'Neill	
1.1	9 April 2020	Michael O'Neill	Removed 20% capitation abatement.
1.2	30 April 2020	Michael O'Neill	Further information added on how payments are calculated. New questions (16, 17 & 18) added.
1.3	12 May 2020	Michael O'Neill	Payment detail and worked examples added. Q20 also added re payment changes.