

**GENERAL HEALTHCARE POLICY
DIRECTORATE**



To: All NI GDPs
BY EMAIL

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COVID-19: FINANCIAL SUPPORT TO GENERAL DENTAL SERVICES

As noted in my letter dated 16 November 2020, I am writing to confirm the details of the GDS Financial Support Scheme (FSS) for the remainder of 2020/21.

I want to begin by firstly thanking you for your continued support and endeavour during a very challenging year for you, your professional colleagues and all your patients. Whilst the prospect of the rollout of a COVID-19 vaccination programme is a welcome one, the challenges will clearly remain for a number of months to come.

The GDS FSS was established as a temporary measure to reduce the risk to the financial viability of the service and to help provide essential dental services during the response period to COVID-19. The total level of FSS and net IoS payments made between April and November 2020 is around £43.3 million which represents a 32% increase compared with the net IoS payments made over this period in 2019-20. As previously advised, an additional £5 million in funding has been secured to allow the FSS to continue on a gross basis for the remainder of 2020/21.

In the majority of cases the spirit of the scheme has been fully realised in our committed dental teams throughout Northern Ireland, with you and your colleagues working in different ways to meet the urgent oral health needs of your patients. However, as has been noted in prior communications, there remain a number of GDPs with consistently low Item of Service (IoS) claims but who are still applying for FSS payments.

In the context of the significant financial challenges facing the Health and Social Care (HSC) sector, the provision of payments under the FSS which are not linked to activity is not sustainable in the longer term. Furthermore, the current arrangements do not fairly compensate GDPs who are working consistently in the spirit of the FSS and are undertaking much higher levels of Health Service activity than others. These issues have been the source of a great deal of engagement in recent months with the British Dental Association who have been consulted on the detail of the revisions to the scheme.

It is therefore intended that from the January - February payment cycle there will be a link established between FSS payments and IoS activity, with different abatement levels being applied. In short, from the January - February payment cycle, GDPs with IoS activity less than 1% of 2019/20 levels will no longer qualify for FSS payments and GDPs with less than 15% of activity will have their FSS payments reduced as outlined in the table below, depending on their level of IoS activity. The 2019/20 Baseline Assessment Year (BAY) will continue to be used. Full details are included in the Annex attached to this letter.

IoS Activity Level	Abatement Applied
15% or more	0%
Between 10% and 15%	10%
Less than 10%	20%
Less than 5%	50%*
Less than 1%	100%

* coming into force from the February-March payment cycle.

The majority of GDPs are exceeding the 15% threshold consistently in recent months. In broad terms activity levels are around 25-30% compared to 2019/20 levels, but we appreciate that there is an increase in the amount of practice activity that is not captured as an IoS. These lower than average activity thresholds, therefore, reflect that fact.

There will be an opportunity for GDPs to provide evidence that they have exceptional circumstances which mean that they would still be operating, if it were not for the Covid-19 restrictions, and still incurring costs. The Department will continue to liaise with the British Dental Association on such cases. I do not, however, anticipate there being many deviations to the application of the new activity levels.

Whilst the purpose of the FSS is to help support dental practices through this challenging time, there is an obligation to ensure that, in return for the significant additional investment being made, practices will provide adequate access for all patients based on clinical needs. To this end, the current conditions surrounding the

FSS remain in place and, while reduced throughput remains, patients should continue to be prioritised based on clinical need and regardless of their registration status.

It is also important that I remind practitioners of their obligation to continue to provide access for patients in line with their pre-Covid work pattern between those exempt/non-exempt from fees and private patients. Where there is evidence of the deregistration of patients or switching HSC patients to private/independent care, other than for the reasons set out in the GDS Regulations, then FSS payments may be withheld or recovered. The full list of conditions relating to the FSS are detailed each month in the online FSS application form and those dentists applying for the scheme must ensure that they meet all these conditions.

It is recognised that as the Covid-19 pandemic has progressed there have been GDPs who wish to leave or enter the GDS. Requests in respect of new entrants to the GDS and the appropriate level of payment to them will continue to be considered by HSCB on a case by case basis.

Full details of the new arrangements are outlined in **Annex A**, and a revised FAQ document will also be made available as soon as possible.

I hope that this news brings some relief from the uncertainty of the last few months as we have worked to identify the best path forward.

Thank you again for your continued support.

Yours sincerely



Michael O'Neill
Acting Director of General Healthcare Policy

cc: Michael Donaldson, Acting Chief Dental Officer
Donncha O'Carolan, Interim Head of Dental Services (HSCB)

GDS Financial Support Scheme

1. From the January - February payment cycle, FSS payments will be on the same basis as previous months but with a rate of abatement applied to each payment linked to the IoS activity thresholds outlined in the table below, with a further 50% threshold to follow in the February-March payment cycle.

IoS Activity Level	Abatement Applied
15% or more	0%
Between 10% and 15%	10%
Less than 10%	20%
Less than 5%	50%*
Less than 1%	100%

* coming into force from the February-March payment cycle.

2. From the January - February payment cycle, GDPs with IoS activity less than 1% of 2019/20 levels will no longer qualify for FSS payments. GDPs will be given the opportunity to provide evidence that they have exceptional circumstances which mean that they would still be operating, if it were not for the Covid-19 restrictions, and still incurring costs.
3. From the February-March payment cycle an additional tier will be introduced to reflect expected minimum levels of service. GDPs with IoS activity level less 5% of 2019/20 levels will have an abatement of 50% applied.
4. The boundaries for the rate of IoS activity and associated abatement rates will remain under review and the British Dental Association (BDA) will be consulted with in advance of any further changes being made.
5. In instances where the baseline year was impacted by irregular working patterns (maternity leave, etc.) the activity level used to calculate the abatement rate will be the same as has been used to calculate FSS payments to date.

6. The current FSS conditions and application process will remain in place including the condition that GDPs continue to provide access to patients without any significant change to their pre-Covid-19 work pattern in terms of the balance between those exempt/non-exempt from fees and private patients. GDPs found to be in breach of this will be asked to provide evidence that the breach was unavoidable. This condition is necessary to ensure that GDPs do not prioritise private care at the expense of HSC patients or urge them (inadvertently or otherwise) into private care; there are increasing reports from patients of such actions and the HSCB will actively follow up these reports. Where there is evidence that such practice is occurring, payments may be withheld or recoveries may be made. We would also like to emphasise to the profession the FSS condition that dentists will prioritise treatment of all patients (registered or unregistered) based on clinical need and the HSCB will monitor compliance with this requirement.
7. In addition, GDPs must not delay the submission of any claims for completed treatment. It is not acceptable for GDPs to withhold claims for submission in a later payment cycle as this would artificially inflate activity levels. Claims in respect of activity completed are to be submitted by 8th of each month. Failure to do so may result in a corresponding reduction in future payments.
8. It is recognised that as the Covid-19 pandemic has progressed there have been GDPs who wish to leave or enter the GDS. Requests in respect of new entrants to the GDS and the appropriate level of payment to them will continue to be considered by HSCB on a case by case basis
9. The following allowances will continue to be paid in line with the normal approach.
 - Continuing Care;
 - Capitation;
 - Seniority*;
 - Dental Foundation Training Allowances;
 - Maternity Benefit;
 - Sickness Payments;

- Rates Reimbursement;
- CPDA;
- Oral Surgery Specialist Allowance* and
- Practice Allowance**

* Subject to ongoing review. Any changes will be discussed with the BDA and / or relevant stakeholders.

** As per MDS 743 of 06 November 2020, the November 2020 practice allowance payment will be based on the November 2019 payment, uplifted by 2.7%

10. The approach set out above is subject to change, but such changes will only be implemented following further consultation with the BDA.