

**DENTISTS/DENTAL BODIES CORPORATE
NATIONAL HEALTH SERVICE
GENERAL DENTAL SERVICES**

REMOBILISATION OF NHS DENTAL SERVICES: PHASE 4

Background

1. The majority of dental practices in Scotland are open and have been operating under Phase 3 guidance. This includes providing aerosol generating procedures (AGPs) for patients in need of urgent dental care from 17 August.
2. **From** 1 November we are moving to phase 4 of the NHS Dental Remobilisation Plan. This means that NHS dental contractors will be able to provide the full range of NHS treatments to all patients in need of both urgent and non-urgent care. We understand that dental practices will require time to fully adapt to this new level of remobilising. It is also recognised that while NHS patients can now receive the full range of NHS treatments, it is not business as usual, because of the current constraints patient numbers will remain lower than normal and dental teams will have to continue to prioritise patients based on oral health needs. Our public-facing exercise in the coming weeks will help support this message.
3. In order to support this remobilisation NHS dental contractors will receive additional stocks of PPE (further details below), increasing the capability to see more patients. We are also increasing the NHS financial support, subject to NHS dental contractors meeting certain conditions, including minimum levels of activity. The financial support measures will operate until they are no longer required.
4. The item of service fee (and patient charge element) is being brought back and integrated within the current set of emergency payments to provide an enhanced package of financial support (again further details below). This is a temporary situation, as we intimated in the recent CDO letter of 12 October we need to bring back a familiar system of dental care as an interim arrangement before embarking on a future reform programme.

The Future of NHS Dental Services in Scotland

5. The Scottish Government recognises that this is a very uncertain time for NHS dental contractors in Scotland. The present situation represents a unique public health crisis that highlights the need for future change. The present payments model predicated on item of service has not performed well in the current set of circumstances. We will therefore be looking at alternative models that offer a more sustainable and predictable income stream for NHS dental contractors in the future. The intention is to consult widely once we have completed this stage of remobilisation on the longer-term outlook for NHS dentistry in Scotland.

Guidance

6. Dental practices should employ all reasonable mitigations to reduce the potential risk of SARS-CoV-2 transmission from dental aerosols. AGPs should only be provided if the surgical space has appropriate ventilation. Clearance of infectious particles after an AGP is dependent on the ventilation and rate of air change within treatment rooms which must be

decontaminated after completion of an AGP. Dental teams should be mindful of the need to maintain physical distancing and other measures to ensure a COVID-secure workplace in staff communal areas. The 4 UK country dental IPC Guidance has now been published by Public Health England (PHE) and is available at the following link:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928034/COVID-19_Infection_prevention_and_control_guidance_Dental_appendix.pdf

7. Through the gradual remobilisation of dental services, practices have been required to develop and update Standard Operating Procedures (SOPs) to ensure the safety of both patients and dental team members. A national SOP will be made available at <https://www.scottishdental.org/>. It is intended that this national SOP could be adopted in full or inform a bespoke practice SOP as required.

PPE Distribution and Stocks

8. Dental practices will now receive additional stocks of both standard and enhanced sets of PPE **per dentist**, including single use face masks, to support them in providing the full range of NHS treatments available under these arrangements. It is expected that patient throughput will remain reduced, around 20-30% of pre-COVID footfall. The supply will be based on seeing 10 patients per dentist (and nurse) per day of whom 5 patients can be seen for an aerosol generated procedure.

9. The same process of local distribution will be held in place to support practices PPE requirements. This PPE will continue to be provided free of charge, until the end of this financial year, providing it is used for NHS patients.

Statement of Dental Remuneration

10. In line with remobilisation to phase 4, all items of treatment and codes that were available under Amendment No 143 have been returned to the SDR as Amendment No. 148 (available to view or download at <http://scottishdental.org/>.) Amendment No. 148 applies from 1 November 2020.

11. NHS dental contactors should also note that triage codes under Item 80, in Section XV – Triage Activity, have been retained and an additional code 49(e) has been included for clinical colour photographs and report in Section XII – Occasional Treatment.

12. We understand that dentists may be triaging patients prior to Amendment No. 148 coming into force on 1 November 2020. In these circumstances triage should be recorded and submitted under Amendment No. 147 with a new course of treatment started under Amendment No. 148.

Item of Service Fees/Patient Charges/Patient Signatures

13. Amendment No. 148 also includes the return of item of service fees and patient charge. NHS dental contractors are strongly advised to submit payment claims for items of treatments as this will be a requirement for continuing to receive NHS financial support measures in the future.

14. The patient charge should be used for courses of treatment started on or after 1 November 2020 (there are no patient charges for courses of treatment started between 22 June 2020 and 31 October 2020).

15. Patient signatures are not required at present. Dental practices should continue to go through the verification process to ensure that patients claiming exemptions or remissions are entitled.

Pay Award for General Dental Practitioners (GDPs) – November 2020

16. Following the publication of the Doctors' and Dentists' Review Body (DDRB) report for 2020/21, the Scottish Government has accepted the pay increase recommendation of 2.8 per cent for GDPs. As in previous years, the increase will apply to gross item of service fees and capitation and continuing care payments.

17. As NHS dental contractors will also continue to receive top-up emergency payments, subject to certain conditions, we have applied the full value of the award to capitation and continuing care payments on the following items:

- Item 41(a)(i), (iii), and (vi) – Capitation Payments
- Item 45(a) and (b) – Continuing Care Payments

The award will be paid in lines 1 and 2 under “additional payments & recoveries” of the e-schedule report.

18. As orthodontists do not receive capitation and continuing care payments instead the pay award will be applied through line 7 of their monthly schedules. This will be based on a 2.8 per cent increase on average earnings over the assessment period.

19. Pay awards will be included in the November/paid December 2020 schedules and will include a backdated element from 1 April 2020.

Determination IV (Vocational Training Allowances)

20. The salary payable for vocational trainees under Determination IV will be increased to £2728.83 a month (£32,746 per annum) with effect from 1 April 2020.

Registration Payments

21. We are aware that after a period of three years without seeing a patient, the capitation and continuing care payments revert to a 20% reduced rate. Because of the on-going COVID restrictions all registrations which are due to reduce on or after the 1st November 2020 but before the 31st October 2021 will have the ‘due to reduce date’ extended by 12 months.

Discretionary Fees

22. Discretionary fees are being reinstated from 1 November; the revised discretionary fee guide will be published on the Practitioner Services website at:

<https://nhsnss.org/services/practitioner/dental/payment-claims-and-fees/>

Prior Approval and Three-Month Rule

23. The prior approval limit has been increased to reflect previous and current pay awards, the new limit will be £430. This new limit applies to all courses of treatment that require prior approval started on or after the 1 November 2020.

24. Section XV of Determination I of the Amendment No. 148 'Submission of Dental Activity' reinstates the three-month time limit for submission of completed treatments and referrals. Therefore any claims submitted on or after 1 November 2020 will be subject to this time limit, irrespective of the acceptance date on the claim. We would strongly urge practices to submit claims as timeously as possible.

Patient Management System (PMS) Suppliers

25. PMS suppliers have been provided with information to update the SDR within their PMS. PMS suppliers have committed to making this change but their delivery dates may differ. Practices may require to run a software update to see the revised SDR items. This should be done as soon as your supplier has made it available. Further information on PMS supplier committed dates, associated guidance, and general submission guidance from Practitioner Services may be found at the following link.

<https://nhsnss.org/services/practitioner/dental/dental-covid-19-update/>

Domiciliary Care for Care Home Residents

26. Amendment No. 148 allows for NHS dental contractors to provide domiciliary care, including those enhanced skills dentists in domiciliary care from 1 November. NHS dental contractors should liaise with care homes prior to attending and take cognisance of wider Scottish Government guidance for visiting care homes and local community transmission and risk rates, advised by Directors of Public Health. The guidance can be viewed at:

<https://www.gov.scot/publications/coronavirus-covid-19-adult-care-homes-visiting-guidance/>

Revised Financial Support Measures for NHS Dental Services

27. A revised package of NHS financial support measures will be in place during the remobilisation of NHS dental services. This continues to recognise the reduced capacity for appointments due to infection control measures and physical distancing.

Additional Top-Up Payments for NHS Dental Contractors

28. **From 1 November 2020 to 28 February 2021**, NHS dental contractors will become automatically entitled to an increased top-up payment to 85 per cent of their NHS gross item of service income based on an assessment period from 1 April 2019 to 31 March 2020.

Conditions of Financial Support

29. **From 1 March 2021** we are taking the opportunity to introduce a system of tiered financial support that means the continuation of NHS financial support is dependent on activity levels and levels of patient registration. Top-up payments to NHS dental contractors will be based on the dental practice evidencing minimum levels of activity and maintaining a list of NHS patients:

- A baseline of average monthly item of service activity will be calculated for the assessment period 1 April 2019 to 31 March 2020 for each dental practice. The level of dental activity provided in a practice in a given month will then be measured against this baseline to determine the tier of top-up support for NHS dental contractors in the practice.

- Alongside meeting the required level of dental activity NHS dental contractors will also be expected to broadly maintain their level of NHS patient registrations. This will be measured at the practice level as the sum of patients registered with each NHS dental contractor.

30. The following table summarises top-up payment tiers for NHS dental contractors and the conditions that must be met to access each tier of financial support:

Raise Tier (85% top up)

The baseline conditions are exceeded and maintained.

- **Activity:** At least 20 per cent of item of service activity in each month compared to the average monthly activity measured at a practice level for the assessment period 1 April 2019 to 31 March 2020. By practice level we mean the sum of item of service activity of each NHS dental contractor in the practice.
- **NHS Registration:** NHS registration patient levels to be a minimum of 95 per cent compared to the practice level at 1 March 2020. By practice level we mean the sum of patients registered with each NHS dental contractor in the practice.

Maintain Tier (80% top up)

The baseline conditions are maintained.

- **Activity:** At least 10 per cent but less than 20 per cent of item of service activity in each month compared to the average monthly activity measured at a practice level for the assessment period 1 April 2019 to 31 March 2020. By practice level we mean the sum of item of service activity of each NHS dental contractor in the practice.
- **NHS Registration:** NHS registration patient levels to a be minimum of 90% compared to the practice level at 1 March 2020. By practice level we mean the sum of patients registered with each NHS dental contractor in the practice.

Reduce Tier (40% top up)

Baseline conditions for Raise and Maintain Tiers are not met. Activity not meeting the minimum level requirements outlined below.

- **Activity:** A level of activity below 10% of of item of service activity in each month compared to the average monthly activity measured at a practice level for the assessment period 1 April 2019 to 31 March 2020. By practice level we mean the sum of item of service activity of each NHS dental contractor in the practice.
- **NHS Registration:** NHS registration patient levels less than 90% compared to the practice level at 1 March 2020. By practice level we mean the sum of patients registered with each NHS dental contractor in the practice.

No NHS activity and wholesale deregistration of all patients will be interpreted as a withdrawal of NHS dental services and NHS financial support measures will be withdrawn accordingly.

Vocational Dental Practitioners

31. VDP activity will be excluded from this assessment

Orthodontists

32. Orthodontics will be assessed on item of service activity only (as patients are not registered with orthodontic practices).

Transitional Period

33. **The period 1 November 2020 to 28 February 2021 will form a transitional preparatory period during which all NHS dental contractors will be paid 85 per cent of their NHS gross item of service based on an assessment period from 1 April 2019 to 31 March 2020.** It is anticipated that this substantial transitional period will afford dental practices the preparation time to meet the conditions of financial support.

Indication of Tier Support

34. **For the February/paid March 2021 schedule**, dental practices will be provided with indicative results of their tier support based on their activity and registration during the transitional period.

Assessment Period

35. **From the March/paid April 2021 schedule**, dental practices will be assessed against the relevant tier. Each metric carries equal weight; failure to meet any of the conditions will result in a dental practice moving down to a lower tier for which they meet all the requirements. Dental activity and registration levels will then be monitored on a monthly basis.

Definition of Item of Service Activity

36. At present we are looking at appropriate measures of item of service activity for monitoring purposes. Practitioner Services are providing modelling work which will be used in further discussions with BDA Scotland and Scottish Government. The choice of measure or measures will be communicated to the profession during the transitional period.

Top-Up Payments

37. Each month NHS dental contractors will receive the difference between their gross item of service earnings for the month and the appropriate percentage of financial support as a top-up payment. Practitioner Services shall, for each NHS dental contractor, for the period of claims for the November/paid December 2020 to February/paid March 2021 schedules:

37.1 using the calculated average gross monthly item of service income (which includes patient charges for fee paying patients) for the assessment period, 1 April 2019 to 31 March 2020;

37.2 calculate 85 per cent of this income of the NHS dental contractor's average monthly gross item of service income at the practice for the assessment period, 1 April 2019 to 31 March 2020;

37.3 where the amount at 37.2 is greater than the NHS dental contractor's gross item of service earnings for the month they shall pay the difference between the two figures as a top-up;

38. For the period of claims for the March/paid April 2021 schedule and any subsequent monthly schedule until further notice:

38.1 identify the tier of financial support for which the NHS dental contractor qualifies, using the criteria described in the Memorandum;

38.2 using the calculated average gross monthly item of service income for the assessment period, 1 April 2019 to 31 March 2020;

38.3 calculate either 40% (reduce tier), 80% (maintain tier) or 85% (raise tier) of the NHS dental contractor's average monthly gross item of service income at the practice for the assessment period, 1 April 2019 to 31 March 2020, whichever is the highest tier, for which the NHS dental contractor qualifies according to criteria described in the Memorandum to this PCA;

38.4 where the amount at 38.3 is greater than the NHS dental contractor's gross item of service earnings for a month they shall pay the difference between the two figures as a top-up;

Continuing Financial Support for NHS Dental Services

39. In addition we are maintaining the other NHS financial support measures at present. They may be summarised as follows:

NHS Dental Contractors

- Continuing care and capitation payments at the increased level;
- Individual NHS commitment payments;

NHS Practice Allowances

- 30 per cent increase in the value of General Dental Practice Allowance (and cap);
- Rent reimbursement payments.

Where allowances continue to be paid they are protected on the basis of payments made at 31 March 2020. For those who become eligible after 31 March 2020 they will also be included in any future remuneration.

Review of NHS Financial Support Measures

40. All the NHS financial support measures will be subject to periodic review as we continue to move through remobilisation, including the tier support and the conditions of financial support. Change may be implemented at short notice because of the wider public health situation. Practices should also note that the anticipated increase in practice activity over the coming months and the consequential increase in patient charge income may provide the Scottish Government with the opportunity to review the maximum level of financial support.

Outstanding Courses of Treatment

41. Courses of treatment that remain incomplete following the interruption in dental services may now be completed. NHS dental contractors may wish to prioritise these accordingly.

42. For any courses of treatment that have been completed but not submitted, they should be submitted by 4 November 2020 to be paid in the October 2020 scheduled paid in November. For practices that wish to submit after this date then these should be submitted by 2 December 2020 to be paid in the November 2020 schedule paid in December

Enquiries

Any enquiries arising from this Memorandum should be taken up with your NHS Board.

Primary Care Directorate
October 2020