

GENERAL DENTAL SERVICES: FINANCIAL SUPPORT SCHEME (GDS FSS): FREQUENTLY ASKED QUESTIONS

(V2.0 – 10 June 2021)

(*) Denotes changes

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 and 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. New entrants to the dental list may also be eligible if a full patient list has been transferred to them from a GDP who would have previously been eligible for FSS.

2. Arrangements from January 2021 (*)

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.

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%

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. Should a GDP believe they have exceptional circumstances they should provide background details to the HSCB to review at the contact details below. Some of the examples of possible exceptional circumstances and guidelines as to how they may be managed are outlined in **Annex A**

PAYMENTS (*)

3. How will FSS payments be calculated?

Firstly, if possible, a Baseline Assessment Year (BAY) average is devised and the worked examples in **Annex B** illustrates how this average is calculated under 4 different scenarios. The 2019/20 financial year remains the best indication of the expected level of activity for GDPs in the absence of the pandemic.

Under the worked example for the standard approach:

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

Item of Service Activity Claims (including Patient Contributions) in January 2021 = **£1,000**

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

- Current Activity Rate = $\frac{\text{IoS Activity Claims January 2021}}{\text{BAY 2019/20 IoS average (including Patient Contributions)}} \times 100$
- Current Activity Rate = $\frac{£1,000}{£9,000} \times 100 = 11.1\%$
As the activity rate is greater than 10% but less than 15% an abatement of 10% is applied.
- The IoS claims for the current month (including patient contributions) are deducted: £9,000 - £1,000 = £8,000.
- The remaining £8,000 is abated by 10% based on the current activity rate: £8,000 x 90% = £7,200.
- The £7,200 is increased by 2.7%* to reflect the 2019/20 GDS pay uplift: £7,200 x 1.027 = £7,394.40.
- Leaving a FSS Payment of £7,394.40.

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.

*This value will be adjusted to account for the 2020/21 GDS pay uplift once implemented.

4. How will BAY IoS average 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 leave during 2019/20

If you have been on maternity leave, the months during which you received a maternity payment are discounted from the BAY average; the remaining 3 lowest months are also discounted and your BAY average is calculated using an average of the remaining months.

For cases where there are fewer than 4 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.

Long-term sick leave or paternity leave during 2019/20

If you have been on long-term sick leave or paternity leave, the months during which you received a long-term sick leave payment are discounted from the BAY IoS average; the remaining lowest month is also discounted and your BAY average 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, may be considered 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 BAY average 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 an associate has left the 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 BAY average.

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. Such evidence could be, for instance, a copy of a contract.

On condition of sufficient evidence being provided, these GDPs will have their BAY average based on 80% of average full year GDP 2019/20 IoS payments on a pro rata basis depending what they were due to work in the absence of Covid-19. So, for instance, a GDP's current activity would be measured against 80% if they are working on a full time basis and 40% if they are working on a 0.5 FTE basis.

If evidence is not provided, no payment can be processed.

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. In exceptional circumstances HSCB will consider new applications to the dental list.

5. 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 £4,854, which is 80% of average full year 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.

6. How long will the scheme payments continue? (*)

Financial support will continue until June 2021 (July payment schedule). The BDA will be consulted on any changes prior to them being implemented. The details of the arrangements beyond June 2021 are currently being developed.

7. 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.

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

Yes, all calculations use gross figures which include patient contributions.

9. 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.

The Health and Social Care Board (HSCB) advise those GDP's who apply for FSS of the need to avoid a duplicate funding scenario by ensuring other government funding schemes are not utilised in respect of activity already funded by FSS.

As per the declaration on the FSS application form, the Department/HSCB may disclose the information on the FSS application to relevant organisations for the purposes of confirming entitlement or for the prevention and detection of fraud.

10. 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.

11. Are there conditions attached to the scheme?

Yes, 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. Failure to meet these conditions may lead to a loss of eligibility to the GDS FSS and recovery of funding already provided.

Any recoveries will be discussed with the GDP in advance of action being taken.

GDPs must 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.

To qualify for FSS GDPs must prioritise treatment of all patients (registered or unregistered) based on clinical need and the HSCB will monitor compliance with this requirement.

12. 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**.

* 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%.

** Revised as per letter of 28 Jan 2021 from Donncha O'Carolan

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

The patient registration period for patients will be extended until the end of June 2021 which will address the issue of patients unintentionally dropping off the register. Arrangements for the management of patient registration from July 2021 are under development.

13. 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 leave as planned.

14. What if I have long term staff absences? (*)

It is the preferred option is that an assistant or deputy (aka locum) should be engaged to cover for an absent GDP. In this instance patients should be transferred to a holding list number and activity will be measured against the BAY average of the absent GDP.

If an assistant or deputy cannot be engaged the practice owner or lead dentist if the owner does not have an active DS number at the premises can apply for up to 50% of the FSS that the absent dentist would have received. Patients should be transferred to a holding list number and activity and FSS payments will be measured against the BAY average of the absent GDP.

These provisions will be available for a maximum of 26 weeks.

15. Will payments be recovered?

Where evidence is found that GDPs are not adhering to the conditions of FSS they no longer qualify for FSS and recoveries of payments received may be made.

GDPs have an 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.

16. 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.

17. Will superannuation be applied to the FSS payments?

Yes, FSS payments will be superannuable (including the patient contribution element). Deductions relating to the FSS did not take place in respect of the April or May payments and were reconciled between June-August 2020.

18. Will FSS payments received in 2020/21 be uplifted by the 2.58% being applied to the Statement of Dental Remuneration (SDR)?

Yes, once implemented the 2020/21 uplift will be backdated to 01 April 2020 and will apply to FSS payments received since that date.

19. I am on, or am going on, maternity leave, how will my 2020/21 FSS payments be reflected in my maternity pay?

In instances where the assessment period for maternity pay includes April – July 2020, when a 20% abatement was applied to all FSS payments, the calculation will be based on unabated gross earnings.

The 20% abatement referred to above was removed in August 2020 and any abatement applied to an FSS payment since then has been linked to activity levels. Therefore, in instances where assessment period for maternity pay includes months after July 2020 when FSS was received any abatement applied will be maintained.

20. 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.

EXCEPTIONAL CIRCUMSTANCES

It is recognised that there are many challenges currently being managed and that some practitioners may not be in a position to meet the activity thresholds due to unavoidable exceptional circumstances. GDPs who believe that they fall into this category, having first taken on board this guidance, should contact the HSCB providing background details and evidence of their exceptional circumstances, if they have not done so already.

When activity is low, for any reason, an abatement is appropriate due to some variable costs not being incurred. A general principle therefore remains that, if IoS activity levels are below threshold targets, there are fewer costs being incurred, therefore some abatement is appropriate.

Below are some scenarios that have been raised with the HSCB to date and details of how they may be managed. There are likely to be other scenarios as the weeks progress and these should be identified to the HSCB in the first instance.

1. GDPs with Multiple List Numbers

In instances where a GDP normally works under multiple list numbers but has modified arrangements as a consequence of the pandemic, FSS payments will be based on the combined IoS activity against all their list numbers for both the BAY average and current activity.

2. Self-Isolation

The requirement to self-isolate, either due to contracting COVID-19 or because of close contact with a COVID positive individual, will not warrant a different approach to be taken, except in circumstances where a GDP is forced to self-isolate for the overwhelming majority of a single payment period. As referred to above, some variable costs will not be incurred and the normal thresholds will apply. Further, the thresholds have already been set at a very low level to account for periods where GDPs are unable to work at full capacity.

Entitlements around sick leave will, of course, remain in place.

3. Shielding

GDPs who are required to shield for medical reasons and who do not meet the higher activity threshold will automatically receive 80% of their BAY average on provision of evidence of the requirement to shield (eg a letter from a relevant GP or consultant).

This abatement is to reflect the variable costs not being incurred.

4. Pregnant GDPs

If a pregnant GDP, over 28 weeks gestation, has been advised to avoid patient facing roles and work in a non-clinical environment, then an abatement based on activity thresholds will not be applied and the GDP will automatically receive 80% of their BAY average on provision of evidence (eg a letter from a relevant GP or consultant)..

This abatement is to reflect the variable costs not being incurred

5. Annual Leave

Annual leave is a normal circumstance in any working year. However, it is acknowledged that for many in the Health & Social Care sector, it has been difficult to utilise annual leave as normal this year and it is an important and valuable part of working life. Because the BAY is calculated over a 12 month period (April 2019 - March 2020), during which annual leave arrangements were not affected by Covid-19, the new thresholds already account for lower payments as a result of annual leave. Further, the new thresholds have been set at a very low level to account for periods where GDPs are unable to work at full capacity.

Annual leave, therefore, is not considered an exceptional circumstance in relation to FSS payments.

6. Childcare Commitments

The issue of childcare commitments has also been raised with the HSCB. Whilst on occasion, there may be difficulties for some GDPs to balance caring commitments with meeting the new thresholds, the thresholds have already been set at a very low level to account for periods where GDPs are unable to work at full capacity. As such, these commitments will not be considered an exceptional circumstance in relation to FSS payments.

Finally, if a combination of the scenarios raised above were to happen concurrently (eg; a period of self-isolation, followed by the closure of a local nursery), the HSCB will, of course, consider these on a case by case basis

WORKED EXAMPLES (JANUARY – JUNE 2021)

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)	£1,000
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The average based on 2019/20 data is calculated = £9,000.

The IoS claims for the current month (including patient contributions) are removed:
 $£9,000 - £1,000 = £8,000$.

Current Activity rate is $(£1,000/£9,000) \times 100 = 11.1\%$

$15\% < 11.1\% > 10\%$ there for abatement of 10% applies

£8,000 abated by 10% is $£8,000 \times 0.9 = £7,200$.

The £7,200 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£7,200 \times 1.027 = £7,394.40$

FSS Payment: £7,394.40

2. Paternity 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 paternity 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:
 $£9,300 - £1,500 = £7,800$.

Current Activity rate is $(£1,500/£9,300) \times 100 = 16.1\%$

16.1% > 15% so no abatement

The £7,800 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£7,800 \times 1.027 = £8,010.60$.

FSS Payment: £8,010.60

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

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:
 $£9,250 - £1,500 = £7,750$.

Current Activity rate is $(£1,500/£9,250) \times 100 = 16.2\%$
 $16.2\% > 15\%$ so no abatement

The £7,750 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£7,750 \times 1.027 = £7,959.25$.

FSS Payment: £7,959.25

2020/21 IoS Activity Claims (including patient contributions)	£1,500
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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
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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:
 $£8,750 - £1,500 = £7,250$.

Current Activity rate is $(£1,500/£8,750) \times 100 = 17.1\%$
 $17.1\% > 15\%$ so no abatement

The £7,250 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£7,250 \times 1.027 = £7,445.75$.

FSS Payment: £7,445.75.

5. Maternity 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	£10,500
Aug-19	£1,200
Sep-19	£950
Oct-19	£500
Nov-19	
Dec-19	
Jan-20	£6,000
Feb-20	£11,000
Mar-20	£8,500
SUB-TOTAL	£42,000
Average	£10,500
2020/21 IoS Activity Claims (including patient contributions)	£1,500

The green cells represent months where a maternity payment was made. These are discounted. The yellow cells represent the remaining lowest months. These are also discounted and an average of the remaining 4 months is calculated. £10,500.

The IoS claims for the current month (including patient contributions) are removed:
 $£10,500 - £1,500 = £9,000$.

Current Activity rate is $(£1,500/£10,500) \times 100 = 14.3\%$
 $15\% < 14.3\% > 10\%$ so 10% abatement

£9,000 abated by 10% is $£9,000 \times 0.9 = £8,100$.

The £8,100 is increased by 2.7% to reflect the Minister's decision on the 2019/20 GDS pay uplift:
 $£8,100 \times 1.027 = £8,318.70$

FSS Payment: £8,318.70

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.
1.4	2 June 2020	Michael O'Neill	Amendment to approach for GDPs without historic data and superannuation.
1.5	4 August 2020	Michael O'Neill	Amendment to approach for GDPs on maternity leave during the baseline assessment year. Extension of patient registration period until the end of December 2020. Extension of FSS until September 2020.
2	9 June 2021	James Murphy	<p>FAQs updated to include revised FSS arrangements introduced in January 2021.</p> <p>FAQ 1 Updated to include line regarding new entrants.</p> <p>FAQ 3 Updated to confirm that payments will be adjusted to account for 2020/21 uplift once implemented.</p> <p>FAQ 6 Updated for current time period</p> <p>FAQ 9 Reworded</p> <p>FAQ – Is there an appeals process? Removed.</p> <p>FAQ - Why have my payments changed from April 2020 to May 2020? Removed.</p> <p>FAQ 12 Note added regarding potential review of some allowances and extension of patient registrations until June 2021.</p> <p>FAQ 14 Added.</p> <p>FAQ 15 Reworded</p> <p>FAQ 18 Added</p> <p>FAQ 19 Added</p>

			Annex A – Exceptional Circumstances added. Annex B – Worked examples updated.
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