



To: Michael O'Neill
General Dental, Ophthalmic Services and Criminal Justice Healthcare
Department of Health
Castle Buildings
Upper Newtownards Road
Belfast
BT4 3SQ

11th May 2021

Re. Approach to GDS financial support for the remainder of 2021/22 and beyond

Dear Michael,

I am writing to outline how NIDPC would prefer the Department of Health to approach GDS financial support for the remainder of 2021/22. This letter also contains a formal request that a working group be urgently established to discuss GDS contractual arrangements for 2022/23 onwards.

PPE funding

Our immediate financial priority is greater clarity regarding the 2021/22 GDS PPE funding model. The EDI/Portal claims deadline for the April-May payment period was 07th May. The paper claims deadline was 20th April. It is wholly unacceptable that GDPs have been asked to complete an entire payment period's worth of treatment without any clarity from the Department of Health regarding how they will be remunerated for the additional PPE costs they incurred.

This level of financial uncertainty is detrimental to mutual interest in increasing patient throughput. Why should high activity dental practices maintain their activity levels when the Department has publicly acknowledged that the 20% FSS abatement mechanism has not provided the intended level of PPE funding? We ask that the Department urgently communicate its plans for April-May by the end of this working week (14th May).

Regarding the PPE funding arrangements for the rest of 2021/22, NIDPC is extremely concerned that the Department of Health has not brought forward any formal proposals. I recognise that budget uncertainty has imposed delays, but practice owners are fundamentally small business owners. The longer this uncertainty continues, the greater the risk that practice owners will reduce activity levels in order to minimise their financial exposure.

Furthermore, budget uncertainty should not prevent the Department from sharing its current thinking with NIDPC. Early consultation, rather than last minute consultation, leads to better policy - benefiting both the Department and GDPs.

Q2-Q4 2021/22 Financial Support Scheme

As we pass the midpoint of the first quarter of 2021/22, NIDPC members have expressed concern that Financial Support Scheme arrangements for Q2-Q4 2021/22 remain unknown. Paper practices start operating in the June-July payment period on 21st May (next week) while EDI/Portal practices enter Quarter 2 in 4 weeks. Considering that PPE funding arrangements are significantly behind schedule, we have significant concerns that FSS arrangements will similarly be left to the last minute.

While we recognise that budget uncertainty has played a role, this continued financial uncertainty is becoming intolerable. Dental practices are taking bookings months in advance without knowing if there will be sufficient financial support in place to allow them to treat those patients. Many Practice Owners are looking at the comparative certainty of private dentistry and are questioning whether the financial sustainability of their practice should continue to rest on uncertain Health Service support payments. Furthermore, this uncertainty is negatively impacting the morale of an already deeply demoralised GDS.

To address this uncertainty, NIDPC calls upon the Department of Health to commit to retaining the current Financial Support Scheme arrangements **until the end of 2021/22**.

We recognise that officials, as we do, have concerns about continuing to base support payments on 2019/20 activity. However, the alternative is to expend significant time and resources on developing and negotiating an entirely new version of the FSS. Experience has shown that new financial support arrangements invariably create new points of contention (maternity payments, calculation errors etc) which take up an unsustainable amount of officials' time.

Committing to extend the current FSS arrangements until the end of 2021/22 is a pragmatic, sensible, approach, which removes uncertainty until the end of this financial year – providing much needed time and space for officials to concentrate on addressing currently outstanding FSS points of contention, plan for 2022/23 and beyond, and tackle wider issues facing the GDS.

We recognise this is a significant financial commitment on the part of the Department, but we believe this could be partially offset by the significant increase in activity unlocked by new-found financial uncertainty combined with a fit-for-purpose PPE funding mechanism.

2022/23 onwards GDS contractual arrangements

As outlined by the evidence compiled in our February sustainability paper - *“An unsustainable future?: The General Dental Service in 2021/22 and beyond”* – the GDS has largely survived, not unscathed, during what has been an unprecedented 12 months that has severely impacted dentistry. However, the sustainability of the GDS was already at risk pre-pandemic due to a decade of below-inflation pay uplifts, rising costs, and cuts to the dental budget.

To address these long-standing structural issues, the GDS urgently requires a new, sustainably funded, contract fit for the post-COVID dental landscape which facilitates recovery, and once and for all embeds prevention and improved oral health outcomes at its core.

To facilitate the development of such a contract, NIDPC request that the Department immediately establish a working group to formally begin discussions on contractual arrangements for 2022/23 onwards.

Other issues

Finally, we would like to remind you that there are a large number of lesser, but still important, issues that remain outstanding - in many cases for several months.

- **Rebuilding out-of-hours services** – The present, unsustainable, out-of-hours approach has been in place for over 12 months. Urgent action is required to rebuild a functional, sustainable, out-of-hours service that allows hard-working GDPs much needed downtime.
- **FSS FAQs** - We have been waiting for updated FSS FAQs for nearly five months. The current FAQs are outdated, compare poorly with its Scottish counterpart, and do not address key issues like how dental practices deal with unfillable vacancies.
- **Maternity Pay** - We first raised concerns regarding how GDP maternity pay calculations interface with FSS payments received in their reference payment in January. Clarity on this issue is urgently required.
- **Orthodontists** – We have recently written to set up a meeting between officials and the NI Orthodontic Group to discuss their concerns regarding financial support arrangements.
- **SDR** – A draft 2020-21 SDR has been shared. However, there is still no clarity regarding whether FSS payments received in 2020-21 will be uplifted.
- **£500 dental payments** – While we recognise that the payment recognition scheme has faced several delays, there is still no clarity regarding the criteria for awarding the payment to the dental team.

We recognise that limited resources, combined with continued financial uncertainty, has meant it has been difficult for officials to address the issues outlined above. It is a recognition of the limited capacity in DoH and HSCB that has driven us to call upon DoH to commit to retaining the current Financial Support Scheme arrangements until the end of 2021/22. Limited resources need to be prioritised.

To discuss the issues raised above in further detail, we ask that the Department consider the value of another ‘catch-up’ meeting – ideally before the end of the month.

Should you have any queries or concerns about the approach outlined above then please contact BDA NI Director Tristen Kelso.

Kind regards,



Richard Graham
Chair – NI Dental Practice Committee

CC'd
Michael Donaldson, Department of Health
Donncha O'Carolan, HSCB