Dear Colleague

GENERAL OPHTHALMIC SERVICES (GOS) – COVID-19 RECOVERY:

INFECTION CONTROL AND PATIENT SAFETY; REVISED FINANCIAL SUPPORT ARRANGEMENTS FOR PRACTICE PREMISES; FINANCIAL SUPPORT ARRANGEMENTS FOR MOBILE PRACTICES; FINANCIAL SUPPORT ARRANGEMENTS FOR NEW PRACTICES/CHANGE OF PRACTICE OWNERSHIP; ONGOING PROVISION OF PPE

Summary

1. This letter advises on the following:
   - A reminder for practices in relation to infection control and patient safety;
   - Revised financial support arrangements for practice premises;
   - Financial support arrangements for mobile practices;
   - Financial support arrangements for new practices and for changes in ownership of existing practices;
   - Ongoing provision of Personal Protective Equipment.

Action

2. NHS Boards are asked to urgently copy and issue the Memorandum to this letter to all optometrists, ophthalmic medical practitioners, body corporates and practices on their ophthalmic lists.

Yours sincerely,

Tom Ferris
Deputy Director

31 August 2020

Addresses

For action
Chief Executives, NHS Boards

For information
Chief Executive, NHS National Services Scotland
NHS Board Optometric Advisers
NHS Education for Scotland

Enquiries to:
Dentistry and Optometry Division
1st Floor East Rear
St Andrews House
EDINBURGH
EH1 3DG

nss.psdgospayments-covid19@nhs.scot (for any practice-specific queries about the financial support measures)
eyecare@gov.scot (for any other queries)
Summary

1. This Memorandum advises on the following:
   - A reminder for practices in relation to infection control and patient safety;
   - Revised financial support arrangements for practice premises;
   - Financial support arrangements for mobile practices;
   - Financial support arrangements for new practices and for changes in ownership of existing practices;
   - Ongoing provision of Personal Protective Equipment (PPE).

Infection control and patient safety

2. As practice staff return to work it is vital that they are taken through the practice infection control and patient safety guidance as outlined in the declaration submitted to Health Boards prior to practices resuming the provision of face-to-face care. Full details of the declaration process, and associated documentation, are detailed in PCA(O)2020(10).

3. Practitioners and all practice staff are reminded to scrupulously follow the advice set out in the NHS Education for Scotland document, 'Resuming General Ophthalmic Services Following COVID-19 Shutdown'. This is a live document and should be referred to on a regular basis.

4. For the benefit of patients and the public, the Scottish Government expects all optical practices to comply with the General Optical Council’s Standards for Optical Businesses (https://standards.optical.org/areas/businesses/). Of particular note is the requirement to ensure that, at all times, patients can expect to be safe in your care.

Revised financial support arrangements for practices premises

5. Community optometry practices and staff remain key to the delivery of eye care in Scotland and the Scottish Government’s eye care reform agenda. Activity within community optometry practice premises has increased since the resumption of routine eye care within practice premises and patients’ own homes, and is expected to continue to increase in the coming weeks. However, it is likely to be some time before overall activity recovers to pre-COVID-19 levels due to infection control measures such as physical distancing and the use of PPE. As such, the provision of ongoing financial support will be made to practices until activity has sufficiently recovered.
6. Practice premises will move to a new remuneration model on and after Tuesday 1 September 2020, as follows:

- **General Ophthalmic Services (GOS) eye examinations**: practices will be paid the relevant GOS fee for each primary and supplementary eye examination undertaken and claimed via eOphthalmic. Where the total value of primary and supplementary eye examination claims submitted within the monthly payment schedule for a practice is less than the GOS(S)1 element of the monthly average financial support payment (as defined in PCA(O)2020(4)), a “top up” payment will be made to make up the shortfall. The assessment as to whether a “top up” is necessary will be made on a month to month basis.

As a condition of eligibility to receive a “top up” payment, contractors **must provide GOS eye examinations to patients and electronically submit all GOS(S)1 forms via eOphthalmic**. A practice which does not provide, in the Scottish Government’s view, an acceptable reason for failing to comply with these conditions may have its “top up” payments stopped.

- **GOS(S)3 and GOS(S)4 vouchers**: payment of the 100% monthly average attributable to GOS(S)3 and GOS(S)4 vouchers, calculated from the 2019/20 financial year, will cease. Practices will be paid for actual activity only which has been submitted via the eOphthalmic claims process.

- **Domiciliary visiting fees**: payment of the 100% monthly average attributable to domiciliary visiting fees, calculated from the 2019/20 financial year, will cease. Practices will be paid for actual activity only which has been submitted via the eOphthalmic claims process.

7. By implementing this model of financial support, practices will “flex” in and out of support, as patient demand dictates. For example, should a practice exceed its GOS(S)1 monthly average from the 2019/20 financial year in one particular month, the payment will be based solely on submitted GOS(S)1 activity. However, if the activity level falls below the GOS(S)1 element of the monthly average financial support payment from the 2019/20 financial year in a subsequent month, the practice will receive a top-up payment equal to the shortfall.

**Financial support arrangements for mobile practices**

8. Mobile practices (those which operate only on a mobile basis) will continue, until further notice, to receive monthly support payments equating to 100% of their average monthly GOS(S)1, GOS(S)3 and GOS(S)4 income across the 2019/20 financial year, as set out in PCA(O)2020(4).

9. The Scottish Government will continue to review the appropriateness of the financial support provided to mobile practices, taking into account compliance with, and activity data arising from, the requirement to submit all GOS(S)1, GOS(S)3 and GOS(S)4 forms in accordance with PCA(O)2020(12).
Financial support arrangements for new practices and for changes in ownership of existing practices

10. In instances where a new practice has been approved by the relevant NHS Board as being suitable for the provision of GOS and a date has been agreed from which this may take place, all GOS(S)1, GOS(S)3 and GOS(S)4 activity from this date will be paid on the basis of actual activity undertaken and claimed. There will be no financial support available solely in relation to the opening of a new practice.

11. In instances where a change in ownership of an existing practice takes place, the circumstances relating to the change will be assessed in order to determine whether financial support payments will continue. In reaching this decision, the Scottish Government will assess each case on an individual basis, in order to determine whether the continuation of support will meet the policy objectives of financial support provision i.e. the protection of the community optometry practice infrastructure and workforce, and the preservation of service provision during the COVID-19 pandemic.

12. The following factors will be considered as part of the decision-making process:

- Levels of overall service provision in the local area;
- Whether the practice premises will remain in its current location;
- Whether the change in ownership is likely to have a detrimental impact on the service available to patients from the practice;
- Whether the patient records are part of the purchase;
- Whether the existing practice staff will be transferred into the employment of the new owners.

13. Practices to whom this situation may apply should discuss the potential change of ownership in the first instance with the relevant NHS Board, who will then in turn refer the matter to the Scottish Government. In reaching its decision, the Scottish Government reserves the right to attach conditions to the continuation of financial support, for the duration to which the support remains in place.

Ongoing provision of PPE

14. The Scottish Government has committed to the ongoing provision of PPE to optometry practices. This PPE is for the provision of GOS primary and supplementary eye examinations only, and practices are reminded that they must source and use their own PPE for any private activity undertaken, including private eye examinations and the dispensing of spectacles or contact lenses. This arrangement will remain in place until the end of this financial year (31 March 2021), with a formal review before 31 January 2021 to discuss arrangements for the following financial year.
Enquiries

15. Any practice-specific queries about the financial support measures should be emailed to P&CFS at: nss.psdgospayments-covid19@nhs.scot.

16. Any other queries about this Memorandum should be emailed to the Scottish Government at: eyecare@gov.scot.

Dentistry and Optometry Division
Directorate of Primary Care
Scottish Government