



2022 Pharmacy Access Scheme

21 September 2021

Gordon Hockey
Director, Legal



Contents – 2022 PhAS



- What is PhAS
- Key information and recent NHSBSA letters
- Eligibility – what’s changing and what’s not changing
- Payment – what’s changing and what’s not changing
- Reviews
- Miscellaneous



What is PhAS

- England-wide system to seek to ensure patient access to community pharmacies
- **Eligibility** primarily based on isolation (pharmacy to pharmacy distance), and deprivation (Index of multiple Deprivation)
- **Payments** to eligible community pharmacies
- A fixed scheme subject to some exceptions, e.g. change of ownerships
- Incorporates a **review** system to deal with any inaccuracies in the data etc
- Provision of clinical services becomes important in the new 2022 PhAS



Key Information



- Eligible pharmacies identified automatically and list published – on the DHSC and BSA websites
- 2022 PhAS starts January 2022 and the first payment will be in April 2022
- Current PhAS continues until December 2021
- Payments are made automatically and do not have to be claimed (for eligible pharmacies) (**NB: CPCS**)





Recent NHSBSA letters

- Every contractor received at least one or more letters from NHSBSA on 2022 PhAS in relation to each of your pharmacies
- If eligible, you should have been informed of your annual 2022 PhAS payment
- If ineligible on **distance**, you should have received access to the distance mapping tool/analysis, for you to check the distance calculation and if you think it is inaccurate seek a review
- If ineligible on **volume** you were informed, but there is no review option for this
- If a change of ownership was already notified to BSA, this may have been picked up in the letter



Eligibility – what's changing



- On the pharmaceutical list on **31 March 2021** (was 1 September 2016)
- >0.8m if in the most deprived areas (IMD decile 1-2) (former near-miss) now **automatically** included
- At least 1,200 Single Activity Fees (SAFs) and not more than 104,789 SAFs (70th percentile) in **2019/20** (ref. year)
- Conditional on registration - on the Manage your Service (MYS) on NHSBSA website - for the Community Pharmacist Consultation Service (**CPCS**) from 31 December 2021 (ongoing registration for CPCS required)
- Must be **accessible** to the public (i.e. not in an airport beyond customs)





Eligibility – what's not changing

- Static scheme based on volume and distance criteria
- > 1 mile from the nearest pharmacy automatically eligible, subject to volume + other criteria
- Road distance, including footpaths, based on Ordnance Survey Road Network data
- Protected eligibility - if eligible for the 2016 scheme and the only change is the distance calculation (despite the same distance and methodology some anomalies occur)
- Pharmacies excluded include:
 - Distance Selling Premises (DSP) pharmacies
 - Local Pharmaceutical Service (LPS) pharmacies (BUT will be considered if join the pharm' list)



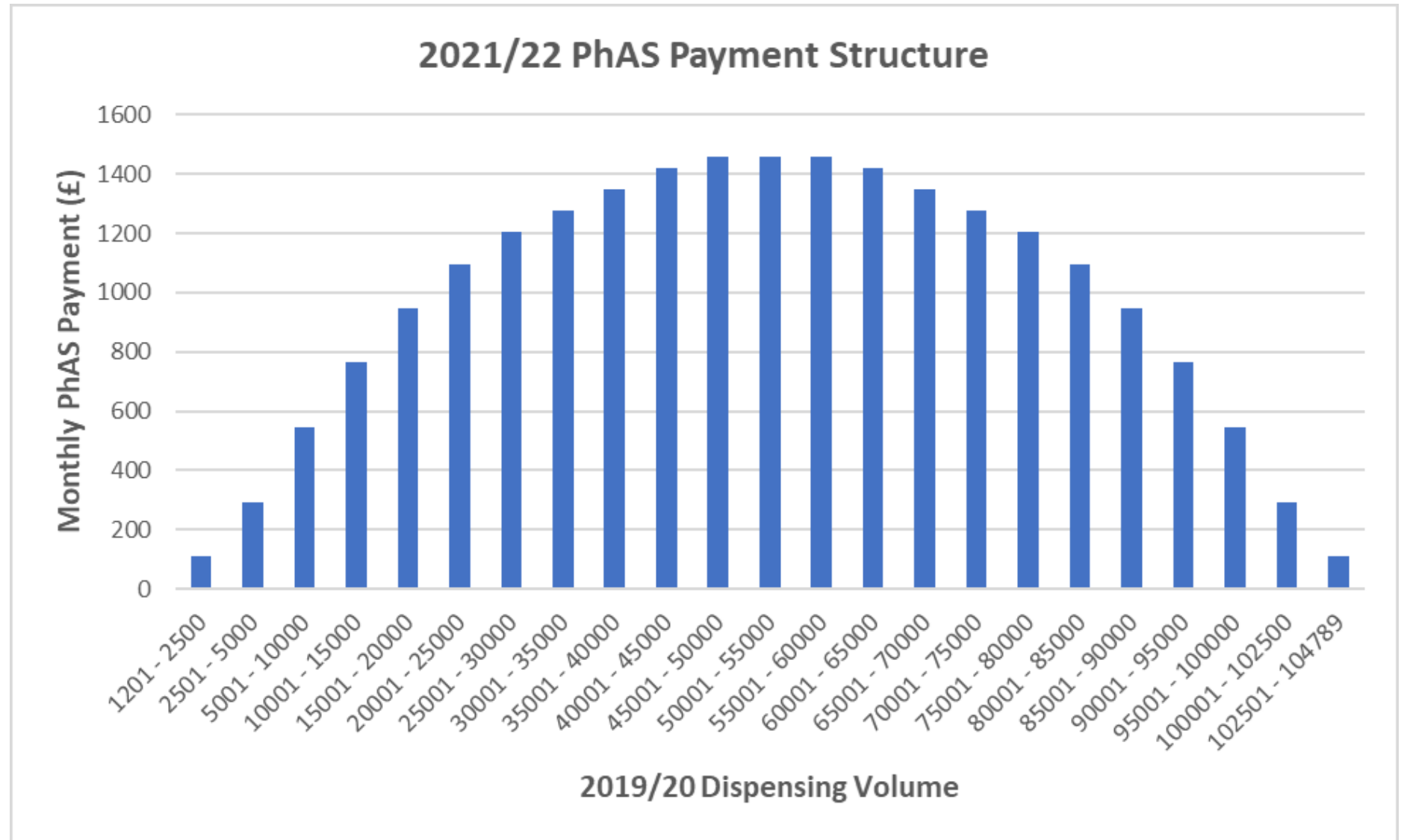
Payments – what's new



Published payment bands based on a bell curve

Max £17,500 per year – average payment in current scheme

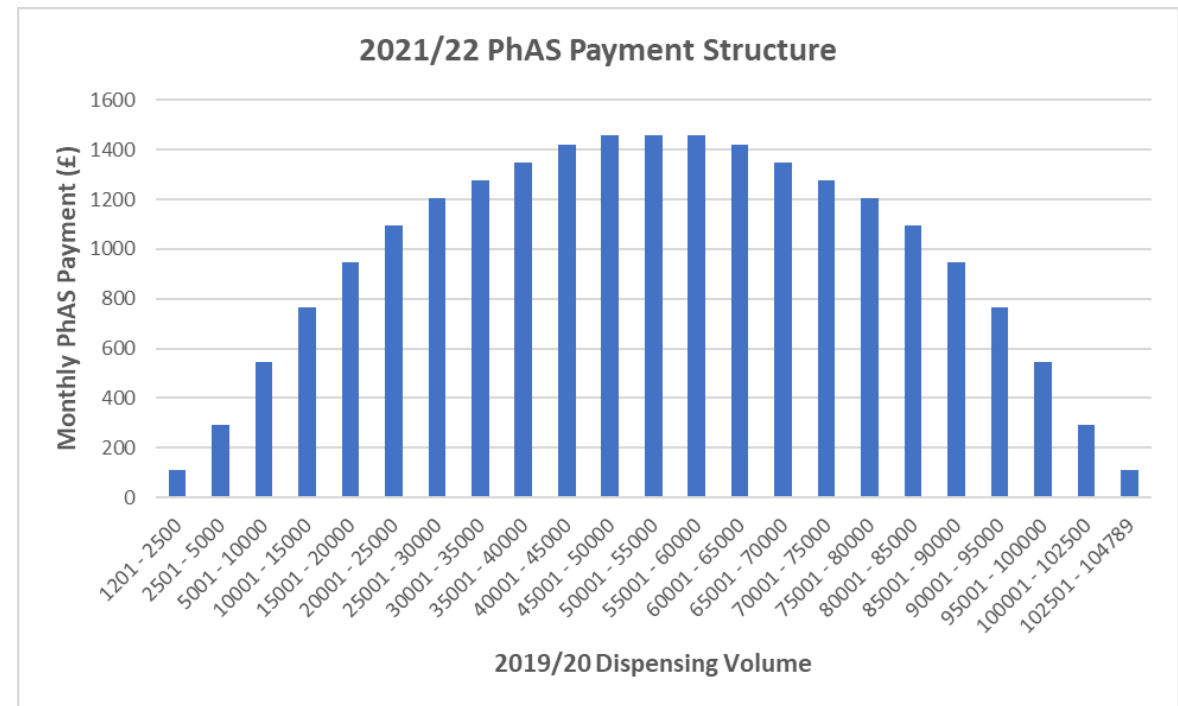
No longer on an uplift based on income





Payments – what's new

- Left of the curve – payments increase with activity - payments to encourage growth for smaller pharmacies
- Right of the curve – payments to minimise reliance on this support by larger pharmacies that are able to remain viable through the provision of NHS pharmaceutical services
- Reference year used – this time 2019/20 (not 2020/21 due to COVID-19)
- Reduced funding overall £20 million (down from £24 million)
- PSNC – generally has sought a considerably reduced PhAS because funding is from the CPCF





Payments – what's not changing

- No requirement to claim payment
- Payments monthly to pharmacies based on provisions in the Drug Tariff
- Payments continue to be paid with the reconciliation payment
 - 2022 PhAS: Jan 2022 – paid April 2022
 - Current PhAS: Dec 2021 – paid March 2022
- Change of ownership – monthly payment to the new owner if the change is after 15/16 of the month



Reviews - overview



- Process similar to last time – time limited review on limited criteria
- No grounds of appeal on dispensing volume
- NHSE&I manage process – decisions by Pharmaceutical Services Regulations Committees
- Web portal to be developed for the application process
- 2 grounds of appeal – inaccuracies and physical feature anomaly



Reviews - grounds

- **Inaccuracies** in distance or location
 - incorrect postcode or location
 - distance calculated incorrectly
- Use the DHSC mapping tool/analysis to consider distance (not Google or other maps)
- **Physical feature anomaly** – such that the viable patient journey is longer >1 mile to the nearest pharmacy e.g.
 - steep hill
 - semi permanent roadblock
- Other eligibility criteria must be met





Reviews – process

- Evidence required – to be uploaded to the web application portal
- Application window 4 Jan – 4 Feb 2022
- May use relevant evidence submitted for the last review process
- More details in due course prior to opening of the web application portal
- NHSE&I regional team consider the review application
- PSRC decisions communicated by the end of May 2022 – payments backdated



Miscellaneous



- Relevant review process for LPS pharmacies returning will be adopted – suggest you involve PSNC
- Change of ownership – retain PhAS eligibility – published list updated after reviews (BSA confirm)
- Permanent relocation – eligibility considered again (but within a shopping centre the distance may be the same)
- Temporary relocation as per the NHS pharmaceutical regulations – PhAS eligibility retained
- Pharmacy open part way through 2019/20 or 2020/21 – SAFs for the months open are scaled up
- CPCS – to comply for a month – MYS registration for CPCS must be for half or more of that month





Questions?

