NIDPC Financial Support Scheme Update – 26th May

Background
- NIDPC submitted a list of issues with the Department of Health’s Financial Support Scheme (FSS) on Wednesday 6th May. A further issues list was submitted on Wednesday 20th May.
- The Department has responded to the 6th May issues list and is reviewing the 20th May issues.
- On Tuesday 26th May, NIDPC Chair Richard Graham, along with BDA NI Director, Tristen Kelso, and Senior Policy Adviser, Iain Hoy, met with DoH officials to discuss the issues.

FSS Uptake
- Officials informed us that there had been no drop off in applications between April and May. In May, DoH contributed £4.6 million to FSS payments on top of £500k for Item of Service claims.

Maternity
- Chair conveyed NIDPC’s concern that the maternity related problems in the FSS had still not been fully addressed. At present, the FSS only removes the lowest month of earnings in the baseline assessment year, but it usually takes more than one month for a GDP returning from maternity leave to reach typical monthly earnings levels. As a result, for many who were on maternity leave during 2019/20, their FSS payments do not reflect their normal level of earnings.
- DoH officials stated that they understood that there were only a small number of GDPs who had raised concerns about this issue. The mistake in the April FSS had been addressed, and the Department did not have the resources to expend further effort on this issue. It was impossible to design a scheme that exactly fitted every GDP’s individual circumstances.

GDPs moving practice
- BDA reps raised concerns about the FSS’s eligibility rules on GDPs moving practice and new entrants into the GDS - the impact on practice FSS income when an associate leaves a practice, new GDPs entering the GDS workforce cannot access FSS payments, and the barrier on Practice Owners retiring as their payments cannot be transferred to another GDP.
- With regards to transferring an Associates FSS income to the Practice Owner when he/she leaves the practice, DoH officials maintain that if a GDP is not in place, then it is not appropriate for compensation to be provided. Payments for capitation and continuing care for the patients on any holding number continue.
- However, with regards new entrants into the FSS scheme, the Department is considering a ‘one in, one out’ rule, whereupon an Associate or Practice Owner leaving the FSS could be replaced by a new entrant, ensuring that the dental practice does not lose the income.

FSS interaction with other Government support
- DoH officials made it clear that the principle of prohibiting duplication remains unchanged. However, there is no detailed guidance regarding how the FSS will interact with wider government support.
schemes. Until now, DoH focus has been addressing FSS payments issues, officials will begin to look at the detail of duplication issues over the coming month.

- Regarding the FSS’s Interaction with Government backed business loans, the NIDPC Chair made clear our position that loans should not impact a GDP’s FSS payment as loans by their nature require repayment. DoH officials acknowledged that loans are different to grants and assured us they were examining the issue.
- BDA reps also raised practice owners’ concerns that if an Associate accessed the HMRC Self-Employment Income Support Scheme (SEISS) then the practice owner would lose access to his/her percentage of their Associate’s FSS income. DoH officials stated that applying for both FSS and SEISS is not in itself deemed to be contrary to FSS scheme rules. However, because no mechanism currently exists to only claim for private income foregone under SEISS, payback of duplicated support will be required. However, it is not yet clear if recovery will be actioned by the Department or HMRC.

**Staff salaries**
- BDA reps requested clarity regarding whether the FSS conditions allowed Practice Owners the flexibility to reduce dental staff salaries if required.
- DoH officials clarified that the FSS conditions do not require Practice Owners to pay their staff 100% of what they were earning prior to the commencement of the scheme. There is some flexibility. However, if the Department detected significant staff salary reductions then a GDP’s FSS payments could be reduced.

**Patient Registrations**
- NIDPC Chair requested that the Department commit to instituting a 3-month rolling extension period with the last 3 months starting when the FSS ends.
- DoH officials could not commit to institutionalising a rolling extension but fully agreed that it was important that no patient inadvertently drops off the register. There will be an extension if it is required.

**CPD Allowance**
- BDA reps requested that - for 20/21 year only – the Department consider allowing GDPs to access all 6 CPD sessions online.
- DoH officials recognised the argument or doing so but believed that it was still too early in the year to commit to this change. They will review this in the coming months.

**Foundation Year**
- BDA reps raised the concern that the FDs will normally only be reaching productive levels at this point in the year – which is outside the 19/20 calculation period. Practices that did not have an FD last year have reported that they have been particularly affected.
- DoH officials responded that they had initially shared these concerns but after investigation of the payments data, believed this was not the case.

**Superannuation**
- DoH officials have announced that they have decided to superannuate the FSS payments – including the patient contributions - in full. A reconciliation will take place over the next three months (June onwards).
- Note that this means that GDPs’ FSS payments will be reduced as they will be now be making employee contributions.

**SDR 2019/20 implementation**
- Work has commenced on updating the SDR. However, it is at least three weeks away from sharing the draft with BDA, and even if it was instantaneously approved, it would take BSO at least six weeks to implement.
- This means it is unlikely that GDPs will receive their SDR backpay until the August schedule at the earliest.
If you have any queries or concerns about the information in this update then please contact iain.hoy@bda.org