

March 2022

PSNC Briefing 009/22: Administrative charges for late submission of prescription forms

Background

The [Drug Tariff](#) requires contractors to submit their FP34C claim form electronically using the [Manage Your Service \(MYS\)](#) portal and dispatch their paper prescription forms, together with a printed copy of the FP34C submission made through MYS to the NHS Business Service Authority (NHSBSA), no later than the 5th day of the month following that in which the supply was made. **From April 2022, late submissions (after the 5th of the month) may result in an administrative charge of £25.**

Introduction

Last year it was announced that, from April 2022 (for March 2022 prescriptions), an administrative charge of £25 will apply to pharmacy contractors who cannot provide evidence that they submitted their FP34C through MYS and dispatched their prescription bundle by the 5th of the month following that in which supply was made.

FAQs

Submission requirements

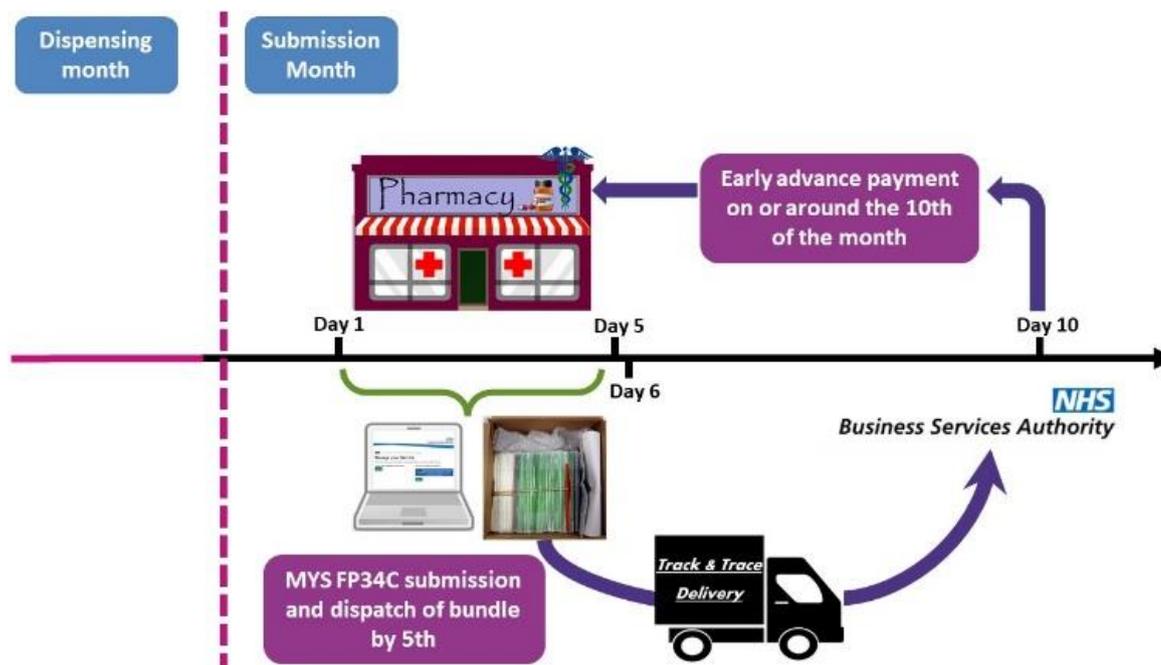
What are the current requirements for end of month submission?

Clause 5A, Part 1 of the Drug Tariff requires contractors to dispatch the prescription forms to the relevant division of the NHSBSA:

- (i) **sorted** as appropriate;
- (ii) in a secure manner that enables **tracking and tracing** of the delivery; and
- (iii) **not later than the 5th day of the month** following that in which the supply was made.

Note: in months where one or more bank holiday occurs during the first five days of the month, contractors will be given an extra day to submit their FP34C and dispatch their prescription bundle to the NHSBSA.

The image below shows the FP34C and prescription bundle submission requirements:



How do prescription forms need to be sorted for end of month submission?

The guidance included with the FP34C submission form on MYS outlines the sorting and submission requirements for monthly paper prescriptions submitted for payment to the NHSBSA. Pharmacy staff involved in end of month submission process are required to sort prescription forms into relevant exempt or paid groups (current rate and old charge rates) and use red separators for forms which include specified items before the prescription bundle is submitted for payment to the NHSBSA. The recommended order for sorting prescriptions is outlined below:

- EPS tokens for non-payment, FP57 forms and paper Repeat Authorising (RA) forms
- Resubmitted forms from previous month(s)
- Red separator forms (includes the newly added Bulk and HMP Service-issued prescriptions)
- FP10MDA instalment dispensing forms (where possible sorted open and flat)
- All other FP10 forms (sorting no longer required by form type (FP10SS PN/SP/HP and FP10D) or by prescriber surname)

For further information contractors should refer to PSNC's webpage on [Prescription sorting requirements](#).

How should prescription forms be submitted to the NHSBSA pricing division?

For submission of paper prescriptions forms to the NHSBSA, contractors are advised to use a reliable and secure courier or postal service that offers track and trace (as outlined in Clause 5A, Part I of the Drug Tariff). After dispatching the prescription bundle, contractors should track it to confirm it has been delivered to/received by the relevant pricing division at the NHSBSA. If the prescription bundle has not arrived at the relevant pricing division as expected, contractors should make enquiries with the courier to establish the whereabouts of the bundle and notify the NHSBSA as soon as possible. Proof of postage by the 5th and/or delivery confirmation should be retained as evidence in case there are any issues for e.g. if a prescription bundle goes missing or is delayed in transit to the pricing division etc.

Can pharmacy contractor's hand-deliver their prescription bundles to the relevant NHSBSA pricing division?

The Drug Tariff requires contractors to use a secure track and trace service for delivery of prescription forms. Pharmacy contractors who opt to personally deliver their prescription forms to their relevant NHSBSA pricing division should retain proof of delivery/receipt in case the bundle is deemed to have arrived late or if it goes missing.

Late submissions

What is deemed late in regard to submission of paper prescription forms?

Bundle submissions are deemed to be late when paper prescription forms are dispatched to the relevant division of the NHSBSA after the 5th of the month following that in which the supply was made. *Note: In months where one or more bank holiday occurs during the first five days of the month, contractors will be given an extra day to submit their FP34C and dispatch their prescription bundle to the NHSBSA. For example, with early May bank holiday in 2022 (2nd May) occurring in the first five days of the submission window, contractors will have until the 6th of May to complete their monthly submission and dispatch their prescription bundle to the relevant pricing division at the NHSBSA. In these months, submissions made after the 6th of the month would be deemed late.*

How do late FP34C submissions through MYS affect advance payments?

Contractors who submit their FP34C figures **late** through MYS (after 5th of the month) will **NOT** receive any earlier advance payments and will instead receive their advance payments in accordance with the normal payment timetable i.e. on or around the 1st of the month following submission. If the FP34C submission through MYS is received very late by the NHSBSA (usually after the 20th of each month), contractors will not receive any advance payment but instead will only receive the final reconciliation payment. For each month, the FP34C submission cut-off dates for normal advance payments will be published on the [NHSBSA's website](#).

Are there any charges for late submission of prescription bundles?

A charge for processing of a late bundle would only apply if a contractor cannot provide evidence, where requested by the NHSBSA, that their bundle was submitted via secure track and trace delivery no later than the 5th day of the following month in which supply was made.

What is the administrative charge for late submissions?

From April 2022 (March 2022 prescriptions), if a contractor does not submit their monthly prescription bundle in line with the Drug Tariff requirements, a contractor may incur an administrative deduction of £25. Before any deduction is applied, the NHSBSA will contact the contractor requesting evidence that the appropriate FP34C claim form was submitted and that the prescription bundle was dispatched by the 5th of the month. Where evidence is submitted, no administrative deduction will be made. If no evidence is provided within the required time, then an administrative deduction will be made from the next Schedule of Payments.

Why may NHSBSA apply an administrative charge for late submission of prescription forms?

Each month, a small number of contractors submit their prescription bundles very late to the relevant pricing divisions at the NHSBSA. This delays the processing of their prescription bundles in a timely manner and affects the calculation of their advance payments. The deduction of £25 reflects the administrative costs involved in NHSBSA calculating and making these payments. The charge may also serve as a deterrent for late submission of bundles.

What evidence may be required to demonstrate compliance with the submission requirements?

Proof of postage by the 5th of the following month using a secure track and trace method and/or delivery confirmation should be retained as evidence to demonstrate compliance with bundle submission requirements. For proof of any FP34C submissions made through MYS, contractors will receive an automated e-mail confirmation of their declaration.

Can the administrative charge deduction be appealed?

In instances where the contractor does not provide the evidence, but the claiming process was followed as outlined in the Drug Tariff, the contractor can challenge the NHSBSA's decision to deduct the administrative charge, by providing evidence and submitting it alongside an appropriate [claim form](#) available on NHSBSA's website. The contractor will need to submit the evidence and the appropriate form no later than one month after the month in which the administrative deduction was made. The claim form along with required evidence must be submitted via email to nhsbsa.PrescriptionAppeal@nhs.net or alternatively the form can be posted to the NHS Business Services Authority, Bridge House, 152 Pilgrim Street, Newcastle upon Tyne, NE1 6SN. If the challenge is successful, the NHSBSA will apply a full refund to the next payment.

Resources

[PSNC Briefing 032/21](#): New payment arrangements for all contractors following end to Pharmacy Earlier Payment Scheme (PEPS)

If you have any queries on this PSNC Briefing or you require more information, please contact PSNC's Dispensing and Supply Team (info@psnc.org.uk) or call 0203 1220 810