



31st March 2025

Circular 007/25

Pharmacy Reimbursement Claims – Supporting Paperwork (Yellow Bags)

Dear Pharmacist,

To provide the necessary controls and assurances to PCRS and to satisfy the Comptroller and Auditor General, the submission of paper bundles (supporting paperwork) may be requested by PCRS.

Cognisant of the administrative challenges which are faced by community pharmacists as part of the day to day operations, the HSE has reviewed the administrative requirements for reimbursement under the various Community Drug Schemes. It is recognised printing and retention of end of month paperwork such as unified claim forms (i.e. traditional 'yellow bag') adds to the administrative workload for community pharmacy contractors.

To satisfy the requirements the Comptroller and Auditor General, PCRS will provide sufficient advance notice to community pharmacy contractors who are selected to submit their end of month supporting paperwork bundle. For example pharmacy contractors selected to submit their paperwork for July, will receive a letter of notification in June. This will enable preparation for submission and to exercise discretion as to the printing and retention of month end paperwork in periods in which pharmacy contractors are not required to submit their yellow bag/bundle.

It is important to note that this pertains to supporting paperwork for reimbursement only. Regulatory requirements as set down in prescription legislation must be adhered to. This includes the printing down of prescriptions transmitted by the national electronic prescription transfer system and treating as the original prescription i.e. Healthmail.

Appendix 1 provides further details on the requirements for submissions where requested in advance by PCRS for audit/review.

Notwithstanding the above changes to administrative arrangements, the HSE will continue to review and analyse claims and rigorously assess claims received by all pharmacies. The HSE acknowledges that the majority of pharmacies comply with expected levels of claiming behaviour and in agreeing these changes the HSE is seeking to reduce administrative burden for those pharmacies.

However, the HSE must also make clear that on an ongoing basis, it does discover a number of pharmacies who fail to meet the standard of claiming behaviour expected. The HSE will continue to invest in data analytics capacity and other measures to improve and enhance its controls on an ongoing basis. The HSE will make no concession to its rights to investigate matters of concerns vigorously, including the use of unannounced inspections where deemed necessary.



Where, after investigation and review by HSE internal probity governance oversight systems, matters are identified which raise concerns in relation to the possibility of fraud, the HSE standard operating procedure and indeed statutory responsibilities under Section 19 of the Criminal Justice Act 2011 require it to refer such cases to the Garda National Economic Crime Bureau for criminal investigation. The HSE made a number of such referrals in 2024.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'Shaun Flanagan', with a stylized flourish at the end.

Shaun Flanagan
Primary Care Reimbursement Service



Appendix 1

Submitting Supporting Paperwork (Healthmail, Unified Claim Forms and Invoices)

GMS:

1. Where a traditional GMS Prescription Form is presented, the top copy of the prescription is included in the bundle. The form number is inserted in the top right hand corner where indicated.
2. Where the prescription is transferred to the pharmacy via Healthmail for a patient with GMS eligibility, a copy of the endorsed prescription is provided. The form number is written on the top right hand corner of the copy.

DPS/LTI/HAA:

1. Where a prescription is presented under Community Drug Schemes such as DPS, LTI and HAA in a traditional paper format, a Unified Claim Form (UCF) or a copy of the endorsed prescription is included in the bundle. **UCFs are not required to be printed via a dot matrix printer. Laser/Inkjet printed UCFs are acceptable to PCRS.**
2. Where the prescription is transferred to the pharmacy via Healthmail for a patient with DPS/LTI/HAA eligibility, a UCF or a copy of the endorsed prescription is included in the bundle.
3. Where providing a copy of the endorsed prescription, the form number must be written on the top right hand corner of the copy.

EU/Dental:

The top copy of the prescription form is included in the bundle. The form number is inserted in the top right hand corner where indicated.

Notes:

- Yellow bags must contain the supporting paperwork tagged with properly completed Summary of Claims Certificates.
- Unified claim forms are not required by PCRS and copies of endorsed prescriptions can be presented to validate claims. Whilst it is noted that community pharmacies use UCFs as receipts for those accessing medicines outside of state schemes, the provision of receipts for patients accessing medicines privately is not a matter for PCRS.
- All previous requirements for valid submission must also be met. This includes evidence of 'Do Not Substitute' instructions from the prescriber where relevant.



- As part of the standard monthly electronic file submissions, pharmacies may be required to scan and submit supporting documentation to PCRS.PPUInvoices@hse.ie for exceptional items (e.g. '777XX arrangements). The GMS pharmacy number and contact details must be clearly identified in the email.
- The Probity Unit when investigating pharmacy reimbursement claims may also request supporting invoices and prescriptions.
- If pharmacy contractors require yellow bags for submission please email PCRS.Supplies@hse.ie.