



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Feidhmeannacht na Seirbhíse Sláinte
Seirbhís Aisíocaíochta Cúraim Phríomhúil
Plás J5
Lárionad Gnó na Páirce Thuaidh
Bealach Amach 5, M50
An Bóthar Thuaidh
Fionnghlas
Baile Átha Cliath 11
D11 PXT0

Health Service Executive
Primary Care Reimbursement Service
J5 Plaza
North Park Business Park
Exit 5, M50
North Road
Finglas
Dublin 11
D11 PXT0

Fón: (01) 864 7100
Facs: (01) 834 3589

Tel: (01) 864 7100
Fax: (01) 834 3589

23rd March 2017

Circular No. 012/17

Re: Third Party Verification

Dear Pharmacist,

As you will recall, third party verification on GMS prescription claims became a requirement, with effect from the 1st December 2016. Third party verification is now necessary in order to properly present a valid claim for payment. It should be possible for pharmacists to secure a signature in the majority of instances. The HSE will reimburse pharmacists who dispense prescribed medicines to eligible patients, and who have made reasonable efforts to obtain signatures from their patients and/or their representatives.

As part of our ongoing audit processes, the HSE conducts monthly post payment reviews to verify the accuracy and reasonableness of claims presented. Pharmacy claims which are found not to comply with audit requirements may be subject to quality assurance post payment review. The HSE appreciates and acknowledges your cooperation in this accountability measure regarding the expenditure of considerable public monies on behalf of patients in the community. An analysis of claims presented thus far has confirmed that indeed the majority of contractors are successfully obtaining third party verification.

Since November 2016 a number of documents have issued clarifying aspects of the third party verification requirement and to assist you in this regard the following comprehensive list applies:

1. **Person receiving the medication:** The person receiving the dispensed items should acknowledge receipt of the supply of the medications listed, on the dispensing date as stamped by the pharmacist on the form, by signing the GMS prescription claim form in the section provided. There is no requirement to provide a copy of the signed prescription claim form to the patient.
2. **Relationship of the Person Collecting:** When a person other than the named person on the prescription is collecting their medicines, the patient's nominee should sign the form and the relationship of that person to the named person on the prescription should also be recorded in the space provided such as relative; carer; neighbour; friend; partner etc.

There is no minimum age specified in the Regulation of Retail Pharmacy Businesses Regulations 2008 or PSI guidelines at which a person can collect a prescription-only medicine either for themselves or on behalf of someone else, where they have been given authority to do so. However, the pharmacist has a professional and legal responsibility to ensure that medicines are supplied safely from a pharmacy to the relevant patient along with sufficient information on how to take the medicines safely as prescribed, and that they know how to store the medicine. The pharmacist must be satisfied that the person collecting the medicine has been authorised to do so by the patient and is of a sufficient age and maturity to safely deliver the medicine to the patient with any relevant information.

3. **Emergency Supply:** Where is it necessary to invoke the emergency provisions of the Prescription legislation, the pharmacist can annotate on the claim that it relates to an emergency supply. The number of occurrences of emergency supply should be low if the requirements of the relevant legislation is respected.
4. **Nursing Home GMS Residents Only:** On admission to a nursing home, patients are normally asked to give consent for the supply of their medication from a named pharmacy. The HSE PCRS will accept the signature of the person in charge of a nursing home or their nominated staff member to sign and acknowledge receipt of the medication listed for the respective GMS patients. This will be accepted on each prescription claim form or alternatively the person in charge may sign to acknowledge the receipt of medicines on the signed delivery records (as required by the PSI). While this form is retained in the pharmacy, a copy of said form should be included with GMS prescription bundle to support your claims.
5. **Literacy Challenges:** Literacy challenges arise in a number of circumstances for patients in their interaction with health services. The following provisions apply for patients who are applicants for state schemes and these are acceptable for third party verification:
 - a. The signature can be considered verified where the patient signs their name;
 - b. The patient may nominate an advocate to act on their behalf and in this situation the advocate signs;
 - c. A patient wishing to represent themselves may place their 'mark' on the space for the signature. This may be witnessed by a person who signs and dates the form.

Thank you for your continued cooperation in this matter.

Yours faithfully,



Anne Marie Hoey,
Primary Care Reimbursement & Eligibility.