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Circular 006/19

15th February 2019

Dear Contractor,

The HSE PCRS is obliged to verify claims submitted for payment to ensure the efficient and effective use of resources.

With effect from 1st March 2019 PCRS will be unable to process child-related Optical claims unless the claim detail supplied includes the child's valid Medical Card Number, or their Personal Public Services Number. The PCRS currently process child-related Optical claims presented for payment by Optometrists participating in the Scheme with the exception of those from Dublin, Kildare, Wicklow, Louth and Meath which are processed locally by their Community Healthcare Organisation.

Please find attached Frequently Asked Questions that may assist your team in this regard. Should you have any queries in relation to submission arrangements please contact the Primary Care Reimbursement Service - Optical Unit on 01-8647150 or by email COSS.queries@hse.ie.

Thank you for your continued cooperation.

Yours sincerely

Anne Marie Hoey

Assistant National Director

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Optical Health Identifier (Child Claims) Frequently Asked Questions

1. What information do I need to ensure the HSE process Optical claims for children?

In order to process child claims, PCRS must validate the eligibility/validity of a person or claim. The optimal method of ensuring the service is being delivered to an eligible person is through validating a Medical Card Number or PPS number.

As such, when an eligible child receives Optical treatment, it will be necessary for you to acquire one of the following:

- a. Valid Medical Card Number
- b PPS Number

Patients should be encouraged to have their relevant document/card listed above to hand at their initial appointment.

2. Am I entitled to collect a PPS number?

As a contractor, you are accessing the PPS number as an agent of the HSE for the purpose of providing the service and are entitled to seek this access under Section 262(4) of the Social Welfare Consolidation Act, 2005, as amended - 'a person shall give to a specified body his or her personal public service number and the personal public service numbers of his or her spouse and children, where relevant, as required by the body for the purposes of the person's transaction'.

3. What if the person is hesitant to share their PPS Number?

The Scheme is in place to provide dispensing of spectacles and/or optical devices through a contracted Ophthalmologist/Optician/Optometrist. Relevant fees are paid by HSE on behalf of eligible persons who are ordinarily resident in the State. Those availing of the Arrangement should hold a valid Medical Card Number or valid PPS Number to ensure they are eligible to receive a service.

4. Will PPSN data be held securely?

The HSE is an entity specifically mandated to maintain patient records. PPS Numbers are an integral part of the controls built into the HSE Primary Care Reimbursement Service procedures. PCRS have stringent controls, policies and procedures in place to ensure the safety of all information.

5. Will data be held securely?

The HSE PCRS protects the security of sensitive personal data captured and held. They have a published privacy statement which sets out how they collect and use personal information and what it is used for, and how information is held securely to prevent the loss, misuse or alteration of information. The privacy statement is available at https://www.hse.ie/eng/staff/pcrs/privacy-statement-august-2018.pdf

6. Other than reimbursement process is there any other reason why you need PPSN data?

In the event that there is a recall or other safety concern, the only central reliable method of identifying all patients who have received a service under the Community Ophthalmic Services Scheme (COSS) is via PCRS. This further ensures the safety of the patient.

7. Does recent General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) allow provision of PPSN?

Article 6 of the General Data Protection Regulation (GDPR) sets out the 'Lawfulness of processing' of personal data, which includes inter alia:

'1 (e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'

The use of and the retention of an eligible person's PPSN is a prerequisite in the provision of medical and surgical service to that person to ensure they are eligible for such services.

8. Does the contractor need to acquire the individual's consent to process their data?

The legislation distinguishes between 'sensitive' and 'non-sensitive' data Health data is regarded as sensitive and as such information may be shared where it is necessary for medical purposes and is undertaken by a medical professional. It is not necessary to seek or acquire the individual's consent to process their data. However it is good practice that a service user is informed of the use of their data. This is contained in the PCRS Privacy Statement https://www.hse.ie/eng/staff/pcrs/privacy-statement-august-2018.pdf.

It is important that data controls are in place within all clinics to protect the sensitivity of the data. All information should be held securely and sharing of information should be on a strict 'need to know' basis between staff involved in a service user's care.

9. What areas process children's optical claims locally and are not currently reimbursed via PCRS?

Dun Laoghaire, Dublin South East, Dublin South City, Dublin South West, Dublin West, Kildare/West Wicklow, Wicklow, Dublin North West, Dublin North Central, Dublin North, Louth and Meath.