



The Community Pharmacy Contractual Framework 2019/20 to 2023/24

Simon Dukes
Chief Executive



PSNC Digital CPCF Roadshow

- Negotiations and political context
- Services
- Funding
- Access, technology and enablers
- Contractor support
- The future and your pharmacy





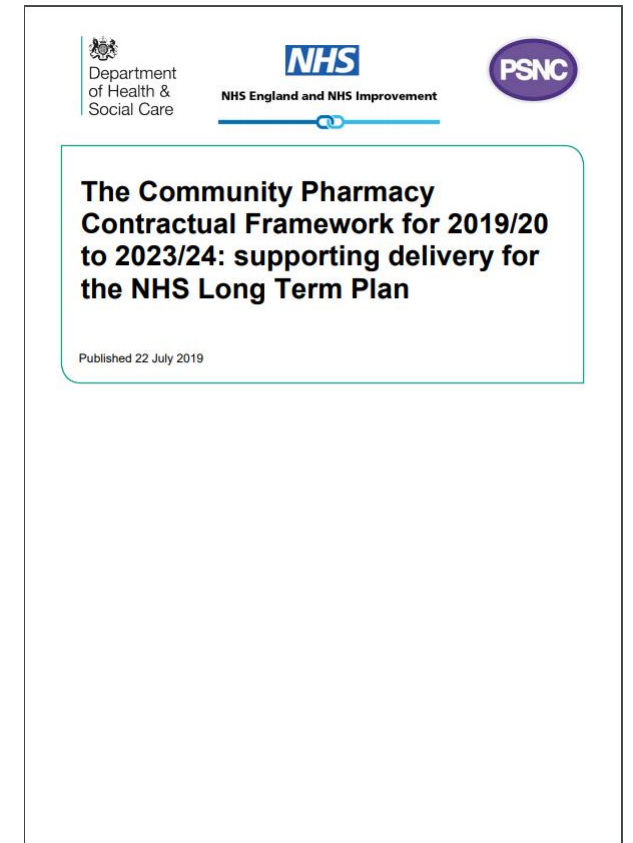
Negotiations and the agreement: an overview

Simon Dukes
Chief Executive



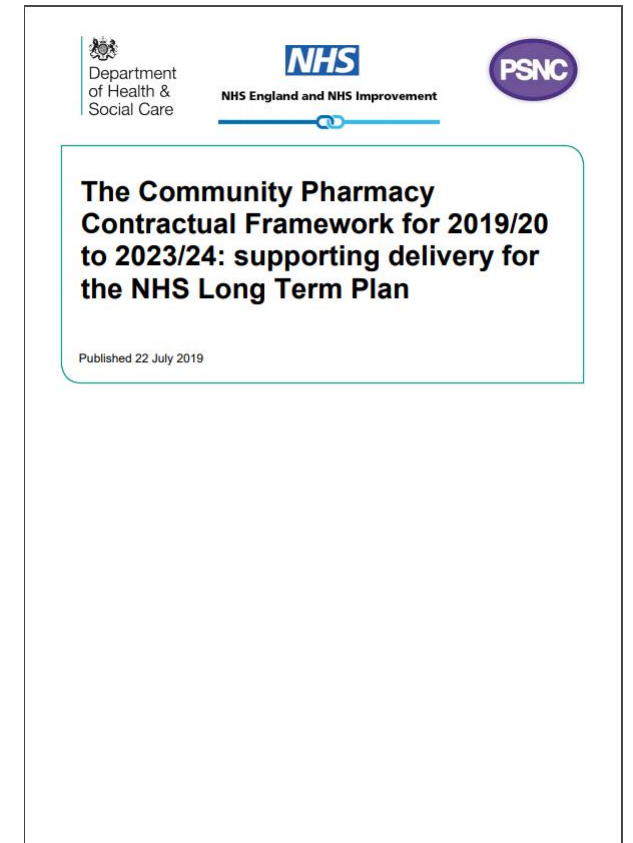
Summary of the deal

- A £13 billion investment in our sector
- Funding protected from further cuts
- Secures the future of community pharmacies in the NHS
- Sets out a clear vision for our services – in line with our asks in the CPFV
- Stability and certainty to enable reform



Summary of the deal

- Expansion of clinical services begins with the launch of the Community Pharmacist Consultation Service (CPCS)
- Taking on an entire cohort of patients with NHS 111 and GPs reliant on us
- This puts us at the heart of primary care
- Giving us leverage for the future





The PSNC Negotiating Team

- PSNC Negotiating Team is elected by the 31 members of the PSNC Committee and represents all parts of the sector
- At the heart of negotiations were the 11,600 community pharmacies
- At every step of the way, the Negotiating Team asked itself: "Is this in the best interests of community pharmacy contractors?"





Negotiations: Political Context

- This was not the deal that PSNC wanted
- We argued for further investment
- Highlighted rising costs, threats to viability and the impact of cost-saving tactics
- But Treasury was immoveable
- HM Government wants to commission a more efficient dispensing service from fewer pharmacies



Negotiations: Political Context

- Further cuts had been planned in 2018/19 and 2019/20
- NHSE&I Board paper released in June stated:

Material financial pressures that have been absorbed within the commissioner sector financial position for 2018/19 include ... the loss of the savings expected from DHSC's renegotiation of community pharmacy fees that DHSC did not secure."

- EP and MUR removal gave an easy mechanism
- Not a strong negotiating position





PSNC: Why did we accept the deal?

- To secure future funding for as long as possible from Treasury, who are seeking efficiencies
- Risk of retribution from walking away: funding cuts; services reduction; opening-up of market with remote dispensing to bypass pharmacies
- Time pressures and risks with an increasingly uncertain political environment
- We believe it was the best deal available





Changes to the CPCF service offering

Alastair Buxton

Director of NHS Services



NHS Community Pharmacist Consultation Service



...relieving pressure on the wider NHS by connecting patients with community pharmacy, which should be their first port of call and can deliver a swift, convenient and effective service to meet their needs...

- National rollout from 29th October 2019
- Referrals to pharmacies from NHS 111
- Replaces NUMSAS and local DMIRS pilots



NHS Community Pharmacist Consultation Service



- Follow up calls to no-show patients reduced to one (from three)
- Transitional payment of:
 - £900 if signed up by 1st December 2019; or
 - £600 by 15th January 2020
- You can now register via MYS
- Fee of £14 per completed consultation
- To pilot: expansion with referrals from GPs, NHS 111 online, Urgent Treatment Centres and possibly A&E





Clinical Services: Prevention

- Level 1 Healthy Living Pharmacy an essential requirement by 1st April 2020
- Hepatitis C testing to be introduced in 2019/20
 - open to people injecting drugs
 - probably commissioned as an Advanced service
 - time limited service
- Data capture for national public health campaigns
 - exploration of use of digital marketing assets



Clinical Services: Prevention

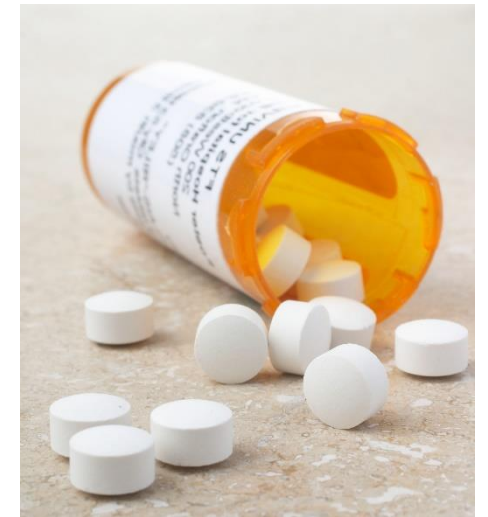
PhIF and PCN Testbed programme to test services:

- Detection of undiagnosed CVD
- POCT to support efforts to tackle AMR
- Stop smoking referrals from secondary care
- Vaccination and immunisation
- Routine monitoring of patients on repeat medication



Clinical Services: Medicines Optimisation

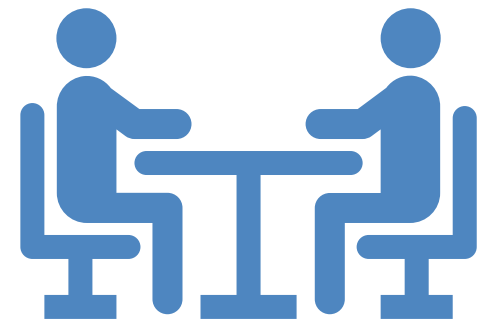
- Medicines reconciliation service to ensure changes in medication made in secondary care are implemented when patient discharged into the community
- Consider NMS expansion to include further conditions
- New service to improve access to palliative care medicines to be piloted





Clinical Services: Medicines Use Reviews

- MURs to be phased out as Structured Medication Reviews carried out by clinical pharmacists working within PCNs are introduced
- Contractors will be able to provide up to
 - 250 MURs during 2019/20 (max. 200 in H1)
 - 100 in 2020/21
- From H2 2019/20, 70% of MURs must be for patients taking high-risk meds or post-discharge



Terms of Service

- New Terms of Service requirements from 1st April 2020:
 - NHSmail
 - Summary Care Records access
 - NHS 111 Directory of Services
 - NHS.UK pharmacy profile updating
 - Pharmacy professionals are Level 2 Safeguarding trained
- All pharmacies must be able to use EPS



Quality: the Pharmacy Quality Scheme

- QPS is re-named PQS
- Annual value of £75m
- Some quality criteria grouped into bundles for payment
- Can claim advance Aspiration payment of up to 70% of QPS earnings from 2018/19
 - Claim via MYS from 30th September to 1st November
 - Payment on 29th November



PQS Gateway Criteria

1. Offering Flu Vaccination Service and/or NMS
2. Active shared premises NHSmail mailbox, with two linked accounts
3. Update NHS website profile within a defined time period
4. Level 2 safeguarding status for 80% of pharmacy professionals



Quality – PQS Quality Criteria

- Risk Management and Safety Composite Bundle (30 points, min. £1920)
 - CPPE Risk Management training and assessment
 - update the previous risk review and record risk minimisation actions taken
 - CPPE sepsis online training and assessment with risk mitigation and risk review entry
 - CPPE online training and assessment on LASA errors
 - New safety report including a focus on LASA errors



Quality – PQS Quality Criteria

- Medicines Safety Audits complementing the GP QOF QI (25 points, min. £1600)
 - Lithium
 - Valproate
 - Repeat of the NSAIDs and gastro-protection audit
- Asthma (5 points, min. £320)



Quality – PQS Quality Criteria

- Primary Care Networks (12.5 points, min. £800; 10 points for pharmacy PCN leads)
 - demonstrate that pharmacies in a PCN area have agreed a collaborative approach to engaging with their PCN
- Digital enablers – NHS 111 DoS profile and SCR access (2.5 points, min. £160)



Quality – PQS Quality Criteria

- Prevention Composite Bundle
(25 points, min. £1600)
 - HLP level 1 (self-assessment)
 - all patient-facing staff are Dementia Friends
 - dementia friendly environment standards checklist
 - discussions with all people with diabetes re. annual foot and eye checks
 - reduction in volume of Sugar Sweetened Beverages sold by the pharmacy (10% or less)



Quality - PQS declaration and guidance



- Declaration period:
9am 3rd Feb - 11.59pm 28th Feb 2020
- Payment on 1st April 2020
- PSNC Briefing 041/19 contains the most up to date information
- NHSE&I guidance now available
- PSNC webinar on 9th October
- Visit psnc.org.uk/PQS for more information

The image shows a thumbnail of a document titled "PSNC Briefing 041/19: The Pharmacy Quality Scheme 2019/20". The document is dated September 2019 and is categorized under "Services and Commissioning". The text in the thumbnail includes:

PSNC Briefing 041/19: The Pharmacy Quality Scheme 2019/20

In July 2019, a new Pharmacy Quality Scheme (PQS) was announced for the 2019/20 financial year; this scheme was formerly known as the Quality Payments Scheme (QPS). This PSNC Briefing is an updated version of PSNC Briefing 029/19 following further discussions between PSNC and NHS England and NHS Improvement (NHSE&I), which provides updated and new information on the Scheme. The requirements of the PQS 2019/20 will also be published in the October 2019 Drug Tariff.

The review period
There will be no review point as there has been in previous schemes. Contractors will be required to make a declaration between 9am on 3rd February 2020 and 11.59pm on 28th February 2020 on the NHS Business Services Authority (NHSBSA) [Manage Your Services \(MYS\) application](#). Contractors will be required to declare that on the day of making their declaration, that they meet the gateway criteria and that they meet the domains they are claiming payment for (except if they plan to meet the Sugar Sweetened Beverage (SSB) quality criterion by 31st March 2020).

NHS England and NHS Improvement guidance
NHSE&I will be publishing guidance to provide more information on the PQS 2019/20; this will be available on the NHS England website. PSNC will alert contractors once the guidance is published through our normal communication channels.

The gateway criteria
There are four gateway criteria which contractors must meet on the day of making their declaration for a PQS 2019/20 payment. As per previous declarations, passing the gateway criteria will not, in and of itself, earn a payment for the pharmacy.

1) **Advanced services**
On the day of the declaration, contractors must be offering at the pharmacy the New Medicine Service (NMS) and/or the NHS community pharmacy seasonal influenza vaccination service.

If a contractor is declaring that they provide the Flu Vaccination Service and/or NMS at the pharmacy to meet this gateway criterion, they should ensure that either or both of these services are listed on their NHS.UK profile.

2) **NHSmail**
On the day of the declaration, pharmacy staff at the pharmacy must be able to send and receive NHSmail from their shared premises specific NHSmail account, which must have at least two live linked accounts.

Each pharmacy's designated mailbox owner can add and remove personal NHSmail addresses to or from a pharmacy's shared premises NHSmail account as required. If your pharmacy does not have a shared NHSmail account or two live linked accounts, [PSNC's NHSmail page](#) contains further guidance.

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Services: in summary

- A new national service – the CPCS – from October 2019
- Positions pharmacies as healthy living centres: prevention and treating minor conditions
- Key role at the heart of the NHS
- Opportunity to prove our capabilities through the CPCS
- And to make case for further investment in that service as it expands





Funding

Mike Dent

Director of Pharmacy Funding



Strategic view

- £13bn funding secured (£2.592bn a year plus PhIF)
 - Original Government plans were for cuts in 2018/19 and 2019/20
 - ‘Up to’ removed
 - Annual removes to balance funding, costs and activity
 - PhIF to fund pilot services which may, if successful, be commissioned nationally
- Work on costs and implications was pivotal
- Discussions will be held on possible new funding models



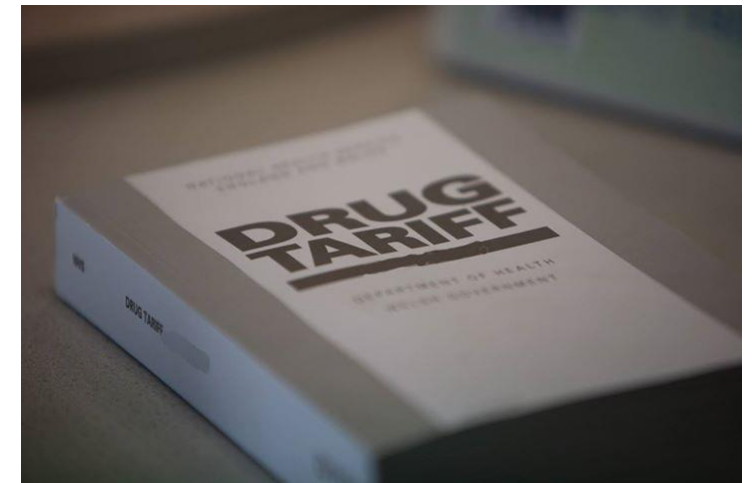
Strategic view

- Govt following agenda from letter of December 2015
 - Clinical role with closer integration
 - Efficiencies through greater use of technology
 - Clustering issue needs resolving
 - Work on costs and implications was pivotal
- Savings in cost of dispensing to free up funding and resources for value-added service delivery
 - Establishment Payments and MURs to be phased out by 2020/21
- Opportunity to tap into local funding (PCNs)



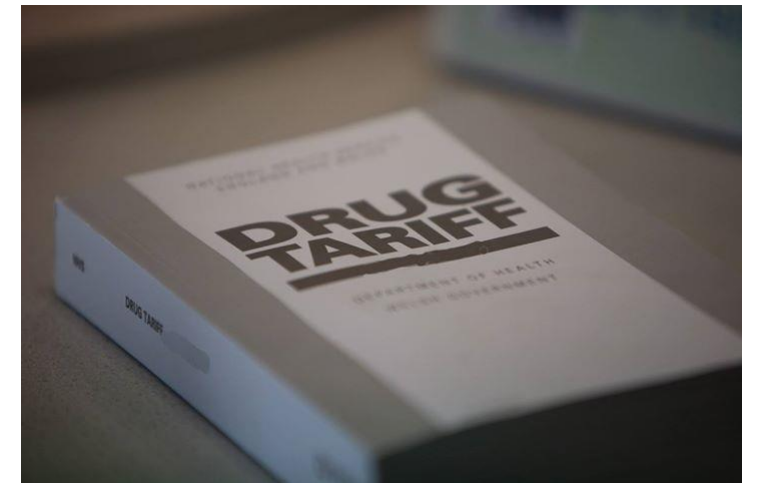
October Drug Tariff

- Many aspects remain unchanged e.g. SAF, NMS, PhAS etc.
- PQS – Aspiration payment can be claimed to ease cashflow (for contractors who participated in QPS 2018/19)
- PQS – Payment end March / early April
- CPCS fee will be set at £14.00
- Serious Shortage Protocol (SSP) fee will be set at £5.35



October Drug Tariff – Transitional Payments

- Unallocated funding distributed using Transitional Payments
- £10m set aside as a contingency for SSP payments and c. £9m for CPCS participation payments
- Balance (c. £50m) via monthly Transitional Payments in H2 2019/20 and 2020/21





Transitional Payments levels

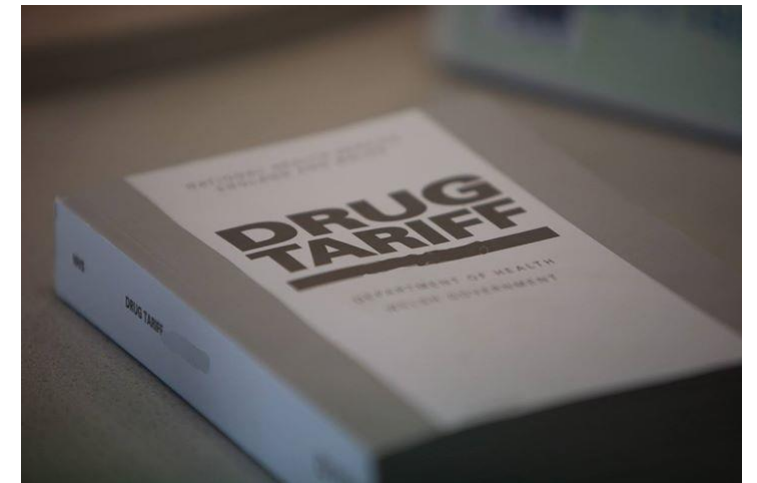
Number of items per month from 1st October 2019	Monthly Transitional Payment from 1st October 2019
0 – 2500	£100.00
2501 – 5000	£700.00
5001 – 19167	£780.00
19168+	£833.33





Reimbursement Changes

- PSNC and Government are committed to improving the current reimbursement arrangements
- This will cover Category M, Category A, discount deduction etc.
- Public consultation closed on 17th September
- Detailed discussions will start in Autumn





Access, technology and enablers

Gordon Hockey

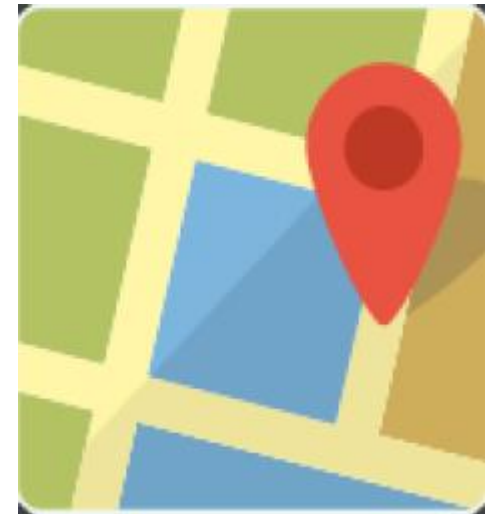
Director of Operations and Support





Pharmacy Access Scheme (PhAS)

- 2019/20 – will continue with current criteria and funding (£24m per annum)
- From April 2020 a revised scheme will be introduced – further details later this year
- From April 2021 an updated and improved scheme will be introduced
- Aims will be:
 - protect access, cost efficient, reasonably simple, not unduly administrative, responsive





Consolidation and administrative burden

- Government still believes there are '*more pharmacies in some places than may be necessary*'
- Want to strengthen the protections offered to pharmacies wishing to consolidate
- Also will look to remove unnecessary administrative requirements



Enabling change

- Technology is *“primarily an opportunity, not a threat; it is also an inevitability”*;
“dispensing to become more efficient to free pharmacists up to provide new services”
- Government will pursue legislative change to allow all pharmacies to benefit from hub and spoke dispensing
- Agree with PSNC models to benefit the whole sector fairly



Enabling change

- Exploring greater use of original pack dispensing to support automation
- Proposing legislative changes that allow better use of skill mix and enable clinical integration of pharmacists
- Exploring the impact of changes to funding and fee structures, including for different types of prescription



Enabling change

- 2020/21 – revised terms of service to reflect the different way in which people use and access online services
- Government will continue to protect patients' freedom to choose which community pharmacy dispenses their prescriptions





Contractor support

Zoe Long

Director of Communications and Public Affairs



Ongoing work on the CPCF

- Discussions to settle:
 - Hepatitis C testing service specification
- Implementation group providing CPCF service support and guidance
- PSNC response to public consultation on reimbursement reforms



Initial briefings and guidance



- Joint deal document: PSNC, DHSC and NHSE&I
- PSNC Briefings 026/19, 027/19, 028/19 and 029/19

- Summary of the deal
- Frequently Asked Questions
- Information on funding
- The Pharmacy Quality Scheme

- Service development grid
- See psnc.org.uk/5yearCPCF

PSNC's Work

July 2019

PSNC Briefing 026/19: A Summary of the Five-Year Deal on the Community Pharmacy Contractual Framework

PSNC, the Department of Health and Social Care (DHSC) and NHS England and Improvement (NHSE&I) have today (22nd July 2019) announced their agreement on a five-year settlement for community pharmacy. This briefing summarises the key elements of the deal for community pharmacy contractors, their teams and LPCs.

Further information is available on the PSNC website at: psnc.org.uk/5yearCPCF

Introduction

Following negotiations between PSNC, DHSC and NHSE&I, HM Government has agreed to make a five-year investment in community pharmacies. The deal secures funding of £2,502m per year for pharmacies (at least £13m over the five years) – significantly more than original Government plans. The agreement also sets out a clear vision for the expansion of clinical service delivery through pharmacies over the next five years, in line with the NHS Long Term Plan.

In this briefing we cover:

- Funding Changes
- The Pharmacy Quality Scheme (PQS) and changes to the Terms of Service
- The NHS Community Pharmacist Consultation Service (CPCS)
- Further service developments
- Other agreements

Full details of the settlement on the CPCS for 2019/20 to 2023/24 are included in the [joint PSNC, DHSC and NHSE&I contract agreement document](https://psnc.org.uk/5yearCPCF).

You can read PSNC's announcement and statements on the settlement on the PSNC website: psnc.org.uk/5yearCPCF

Contractors should note that a key feature of this settlement is the built-in annual review and negotiation process; this means that much of the detail, particularly for later years of the settlement, has yet to be finalised. Contractors will be updated on an ongoing basis as discussions continue.

Ahead of October 2019, we are accelerating finalisation of details for 2019/20 and in particular on the implementation of the CPCS and the NMS.

PSNC Briefing 027/19: Five-Year CPCS Deal – Frequently Asked Questions

To accompany the announcement of a five-year settlement for community pharmacy, PSNC has set out responses to a number of questions to help to answer queries that community pharmacy contractors may have.

The Frequently Asked Questions (FAQs) cover the following topics:

- The Five-Year Agreement;
- The Negotiations;
- Funding;
- The Pharmacy Quality Scheme (PQS);
- Medicines Use Reviews (MURs) and the New Medicine Service (NMS);
- Other service developments and the Community Pharmacist Consultation Service (CPCS); and
- Technology and practicalities.

For any queries not covered by this

The Five-Year Agreement

Q1. What does a multi-year settlement mean?

PSNC, the Department of Health and Social Care (DHSC) and NHS England and Improvement (NHSE&I) have today (22nd July 2019) announced their agreement on a five-year settlement for community pharmacy. This agreement, agreed to a vision of a Contractual Framework (CPCF) for services that will be piloted and then rolled out across the sector.

NHS Government has committed to protect funding and provides stable funding to help the sector to deliver the services that will be piloted and then rolled out across the sector. The settlement agrees the principle of annual reviews will service developments and the CP distribution for each financial year, becomes available – we are current 2019.

Q2. What will happen to funding in 2019/20?

Overall, national community pharmacy funding (the contract sum) comprises two key elements and retained margin (part of reimbursement) which can be defined as follows:

Remuneration: This is the fees and allowances paid to pharmacies for the professional services they provide.

Reimbursement: This reimburses the cost of the medicines that pharmacies supply to patients. Pharmacies first have to purchase these medicines, usually from medicines wholesalers, and they are then reimbursed for them by the NHS, generally according to the Drug Tariff, which sets out prices for many medicines and a 'discount deductor' scale.

The difference between reimbursement and purchase price constitutes 'retained margin' which pharmacies are allowed to keep as part of their agreed funding subject to a collective agreed total (currently £800m).

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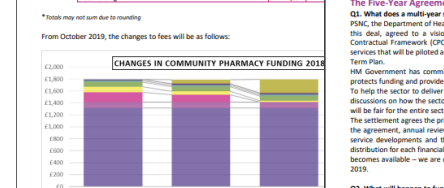
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Community pharmacy funding distribution April 2018 to March 2021

	2018/19	2019/20
Single Activity Fees	£1,315	£1,315
Other Item Fees	497	497
Establishment Payment	2,046	2,046
Medicines Use Reviews	194	194
Pharmacy Quality Scheme	475	475
Pharmacy Access Scheme	274	274
New Medicine Service	523	523
Community Pharmacy Consultation Service	69	69
High C Testing Scheme	69	69
Transition Payments and new clinical services	69	69
Retained Margins	£800	£800
Total funding*	£2,892	£2,892

* Totals may not sum due to rounding

From October 2019, the changes to fees will be as follows:



Community Pharmacy Contractual Framework service development grid

This grid illustrates how changes to the services within the Community Pharmacy Contractual Framework (CPCF) are expected to be phased. The roll out of all pilots will be subject to negotiation and each pilot demonstrating that the substantive service will offer value for money.

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
1. Community Pharmacist Consultation Service (CPCS) - NHS 111 referrals	☑	☑	☑	☑	☑	☑	☑
2. GP CPCS pilot	☑	☑	☑	☑	☑	☑	☑
3. GP CPCS implementation	☑	☑	☑	☑	☑	☑	☑
4. NHS 111 Online CPCS pilot planning and implementation	☑	☑	☑	☑	☑	☑	☑
5. NHS 111 Online CPCS implementation	☑	☑	☑	☑	☑	☑	☑
6. Urgent Treatment Centre CPCS pilot	☑	☑	☑	☑	☑	☑	☑
7. Urgent Treatment Centre CPCS implementation	☑	☑	☑	☑	☑	☑	☑
8. Palliative care medicines service pilot planning and implementation	☑	☑	☑	☑	☑	☑	☑
9. Palliative care medicines service implementation	☑	☑	☑	☑	☑	☑	☑
10. All pharmacies to be Health Living Pharmacy (HLP) Level 1	☑	☑	☑	☑	☑	☑	☑
11. Hypertension and Atrial Fibrillation (AF) case finding pilot planning and implementation	☑	☑	☑	☑	☑	☑	☑
12. Hypertension and AF case finding service implementation	☑	☑	☑	☑	☑	☑	☑
13. Stop smoking referrals from secondary care pilot planning and implementation	☑	☑	☑	☑	☑	☑	☑
14. Stop smoking referrals from secondary care implementation	☑	☑	☑	☑	☑	☑	☑
15. Point-of-Care-Testing (POCT) and treat for common ailments pilot planning and implementation	☑	☑	☑	☑	☑	☑	☑
16. POCT and treat for common ailments implementation	☑	☑	☑	☑	☑	☑	☑
17. Hepatitis C testing service	☑	☑	☑	☑	☑	☑	☑
18. Medicines Use Review (MUR) phase out	☑	☑	☑	☑	☑	☑	☑
19. Medicines reconciliation service	☑	☑	☑	☑	☑	☑	☑
20. Discuss and agree expanded scope of New Medicine Service (NMS) to other therapeutic areas	☑	☑	☑	☑	☑	☑	☑



Further Support for Contractors

- CPCS draft service specification, template SOP, toolkit and webinar
- New website page on PQS: psnc.org.uk/PQS
- Resources for asthma and diabetes quality criteria
- Guide to HLP accreditation
- New CPCF News category on website
- Inbox for queries: cpcf@psnc.org.uk



CPCF Checklist emails



- New email: the CPCF Checklist
- Highlights actions that contractors need to take now
- Topics such as signing up for the MYS service and achieving HLP accreditation
- The Checklist will walk you through the changes and new services, signposting to detailed resources and training webinars
- Sign up now psnc.org.uk/email

Problems viewing this email? [Click here to view an online version.](#)

 **CPCF Checklist**
Friday 2nd August 2019

PSNC is working to provide as much information and as many resources as possible to help community pharmacy teams to understand the details of the new Community Pharmacy Contractual Framework (CPCF) agreement as they are finalised in the ongoing negotiations.

This email is one of a series of recommended actions for community pharmacy contractors to help you to get ready for the introduction of all elements of the five-year CPCF. There is a lot to do and details will be coming out in stages, so this email series will help guide you through the process and highlight all of the resources and support available to you.

1. Watch our webinar and register for a roadshow event

Two great ways to familiarise yourself with the details of the five-year CPCF agreement are to watch our contractor webinar and to register for one of our roadshow events.

Contractor webinar

You can now view an on-demand recording of our webinar to learn about the terms of the new CPCF agreement for 2019/20 to 2023/24 and what it will mean for your pharmacy. The PSNC policy team also answered questions from viewers during the webinar.



Upcoming Support for Contractors

- PQS webinar to follow soon
- Information on the Hep C testing service
- Working closely with LPCs and the other pharmacy organisations
- Look out for CPD opportunities from Health Education England/PhIF





Contacting PSNC

- All guidance will be posted on psnc.org.uk
- Sign up for emails at: psnc.org.uk/email
- Follow [@PSNCNews](https://twitter.com/PSNCNews) on twitter
- For queries on the CPCF contact:
 - Queries: cpcf@psnc.org.uk
or 0203 122 0810
 - PSNC Regional Representatives
 - PSNC Chief Executive:
chiefexec@psnc.org.uk





The Future and Your Pharmacy

PSNC Chief Executive
Simon Dukes





Challenges and change

- Difficult financial situation and huge challenges ahead: we will continue to fight your corner
- Through annual reviews (which we secured) we will stress costs and manageability
- As currently configured, the deal means **major changes for all pharmacy businesses**



What does this mean for your businesses?

- The deal guarantees a future for those up for change
- Specific challenges will be around:
 - dispensing efficiencies
 - freeing up pharmacists' time
 - wider use of clinical workforce
 - branch viability and consolidations
 - coming together locally in PCNs
 - working closer with GPs





Next steps for PSNC

- Continuing to emphasise the case for contractors' costs
- Working to support you with immediate elements – PQS and CPCS
- Providing direct contractor and LPC support
- Negotiating for 2020/21: PhAS changes, funding and CPCS extension
- Keeping you informed of progress



Conclusions

- First step: read the deal document
- The deal gives us a future, at the heart of the NHS
- We have the chance to add value as a clinical services provider
- And to integrate better within primary care via PCNs
- Giving us leverage for the future



Q&A



psnc.org.uk



cpcf@psnc.org.uk



0203 1220 810



The screenshot shows the PSNC website homepage. At the top, there is a navigation bar with the PSNC logo, the text 'Pharmaceutical Services Negotiating Committee', the PHARMACY logo with the tagline 'the Heart of our Community', a 'QUICK LINKS' dropdown menu, and a search bar. Below the navigation bar is a horizontal menu with several categories: PSNC's Work, Funding and Statistics, Contract and IT, Dispensing and Supply, Services and Commissioning, The Healthcare Landscape, and LPCs. The main content area features a large banner for the 'Five-Year CPCF' deal, with a sub-header 'Funding negotiations result in five-year CPCF deal'. Below this, there are links to 'Read about the new agreement' and 'Watch the on-demand webinar'. To the left of the banner, there are smaller sections for 'Check Rx' (Prescription Item analysis) and 'Check 34' (Schedule of payment analysis), along with a 'Brexit and Pharmacy' section. Below the banner is a 'CPCF NEWS' section with a 'View more CPCF news >' link. The news section contains four articles: 'New MUR target requirements from 1st October', 'PSNC responds to consultation on community pharmacy drug reimbursement reform', 'CPCF Roadshow continues with Ipswich and Peterborough', and 'Important updates on the Pharmacy Quality Scheme'. The bottom of the page features a decorative bar with colored segments.



Reflections:

- The changes over the next five years will not be easy
- All pharmacies under pressure
- But we have a way forward
- There are signs that the Government is moving in our direction



Conclusions

- We now have a clear vision for our future – set out in deal document
- It is critical that we deliver
- This means **major changes for all pharmacy businesses**
- A chance to put ourselves at the heart of primary care
- Offering clinical support to the NHS
- Giving us leverage for the future



Contact Information



psnc.org.uk



cpcf@psnc.org.uk



0203 1220 810

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