Using Accurate, Trusted, Aggregated data for Invoice Reconciliation

The privacy of those receiving any treatment should not, and need not, be compromised for the generic payment of invoices. Carefully designed data products should allow this to be done without reference to individuals. Such data products will be sensitive due to the necessary presence of small counts, but they need not be individually identifying.

As such, data products produced for the purposes of invoice reconciliation should be about treatments, not individuals. Several individuals may be included in a single treatment count, and several treatments may be attributed to an individual. Such counts operate at an organisation level, for a stated period of time. As aggregated counts on treatments, the data is not an individual level record, and will have no direct consent implications.

Invoices, then specify which treatments, and which time period(s), are being billed for.

Reconciliation looks to see that invoices do not exceed those prescribed, for each time period.

Where treatments being invoiced diverge from those being prescribed, for any specified time, they can then be more closely examined. This should limit the scope for fraud within the invoicing system, as it is treatments that are charged for and controlled, not individuals receiving treatment.

Additionally, all non-machine-readable documents (ie, invoices capable of being printed), must include a machine readable barcode\(^1\), to minimise errors from repeated retranscription of code.

Apart from the bank and specific contact details of the organisations involved, the details of any invoice, which didn’t include small numbers, should be entirely publishable.

Such a model should also allow effective generation of open data around spending on items and counts in line with the NHS England and Government commitments to transparency.

It is possible to define a system for invoice reconciliation. That NHS England has put no effort or resources into it does not affect that process.

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\(^1\) or QR code, which allows more information to be encoded.