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Prescription Exemption Checking Service – Client Functional Specification

Document Management

Revision History

Version	Date	Summary of Changes
0.1	15/06/2018	Initial version for review
0.2	19/06/2018	Clarified requirements wording after BA review
0.3	27/06/2018	<p>Amended PEC-FR-37 to allow printing tokens for exempt patients where prescribed items are Schedule 2 or 3 CDs</p> <p>Added requirement PEC-FR-52 to describe behaviour in claim amendment</p> <p>Added an item to Appendix A to be used for Universal Credit exemption</p> <p>Reworded PEC-FR-28, PEC-FR-39, PEC-FR-35 & PEC-FR-51 to clarify meaning.</p> <p>Added wording to 8.1 to clarify claim message behaviour.</p> <p>Filled out architecture section.</p>

Reviewers

This document must be reviewed by the following people:

Reviewer name	Title / Responsibility	Date	Version
Nazia Kotia	NHS Digital Business Analyst	19/06/18	0.2
Scott Pollard	NHSBSA Project Manager	26/06/18	0.2
Joaquin Garcia	NHSBSA Technical Architect	26/06/18	0.2
Martin Hagan	NHSBSA EPS Lead	26/06/18	0.2
Andy Dickinson	NHS Digital IG Lead	26/06/18	0.2
Jim Thorpe	NHS Digital Project Manager	26/06/18	0.2

Approved by

This document must be approved by the following people:

Name	Approval	Date	Version
Andrew Coates, NHS Digital Programme Manager		Not Approved	0.3
Rob Gooch, NHS Digital Senior Technical Architect		Not Approved	0.3
Rebecca Blessing, DHSC Lead		Not Approved	0.3
Victoria Hutchinson, NHSBSA Programme Manager		Not Approved	0.3

Glossary of Terms

Term / Abbreviation	What it stands for
Electronic prescription	The information transmitted electronically, with the inclusion of an Advanced Electronic Signature, from a prescriber to Spine to allow dispensing and claiming via EPS
Electronic Prescription Service (EPS)	Electronic Prescription Service delivered by the EPS/ETP programme
Electronic Transmission of Prescriptions (ETP)	Electronic Transmission of Prescriptions programme, now known as the Electronic Prescription Service
Prescription token	Paper copy of the electronic prescription used to capture the patient's declaration of charge paid or exemption.
FP10	The paper form that is used to create a paper-based NHS prescription.
Medication item	Any medicine, appliance or reagent that can be prescribed
Organisation Data Service (ODS)	The Organisation Data Service (ODS) provided by the Authority. It is responsible for the national policy and standards with regard to organisation and practitioner codes.
Patient Medical Record (PMR)	A term used to describe the module/component of the system that holds patient medical records. Some implementers use the term PMR to describe a single patient medication record. Within the EPS documentation the term relates to the entire collection of patient medical records for the GP practice.
Personal administration	The prescribing, dispensing and claiming of products listed in the GMS Statement of Financial Entitlements, by a GP practice, which can be directly administered to the patient.
Prescribe	The act of authorising medication items on a prescription.
Repeat prescription	A prescriber-authorised repetition of a prescription
Repeatable prescription	A prescription valid for an authorised number of issues
The System	The system seeking compliance with the Prescription Exemption Checking Service

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Further Requirements:

NPFIT-FNT-TO-TIN-1383 IG v3 Foundation Module

NPFIT-FNT-TO-TIN-1023 PDS Compliance Module V2 - Baseline Index

NPFIT-FNT-TO-TIN-1023 PDS Compliance Module V3 - Baseline Index

NPFIT-ELIBR-AREL-DST- 0408.04 ITK Spine Mini Services Client Requirements

NHSBSA Overprint Specification for NHS Prescriptions

NPFIT-ETP-EDB-0278.03 EPS Infrastructure Specification

NPFIT-ETP-EIM-0015 Guidance for Endorsement

NPFIT-FNT-TO-TIN-1383 IG v2 Foundation Module IG v3 Foundation Module

Related Guidance Documents:

NPFIT-ETP-EDB-0025 EPS Prescribing Systems Compliance Specification v6.10

NPFIT-ETP-EIM-0110 RBAC Implementation Guidance for the EPS R2

NPFIT-ETP-EIM-0015 Guidance for Endorsement

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1 About this Document

1.1 Purpose

This document details the functional requirements that must be fulfilled in order for client systems to integrate with the Prescription Exemption Checking Service.

Some aspects of the business processes and implementation will require agreement with the relevant professional and/or representative bodies, and local implementation detail may vary between organisations, in particular identifying those processes which are optional and mandatory. The system will be expected to support the documented business process whether they are optional or mandatory.

This document specifies the functionality required to integrate with the Prescription Exemption Checking Service for dispensing in England.

It is likely that dispensing systems are already compliant with the Electronic Prescription Service and so must additionally adhere to the requirements defined within the “Dispensing Systems Compliance Specification” (ref: NPFIT-ETP-EDB-0024).

1.2 Audience

This document has been written for implementers.

1.3 Content

Within this document, system requirements are explicitly numbered and listed within tables. Additional documentation, guidance and illustrations are contained within each document section to support the understanding of the requirements.

The key words "MUST", "MUST NOT", "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "MAY", and "OPTIONAL" in this document are to be interpreted as described in RFC 2119.

Drafting notes and areas for further review and confirmation are highlighted.

2 Background

NHS Prescription Fraud is currently costing the NHS over £200 million a year. Patients are not clear what exemptions they are entitled to and how to obtain the required proof. The current paper system is open to error and checks are only carried out by the NHSBSA once medication has been dispensed.

NHS Digital has been asked to provide an effective solution to ensure that exemptions from prescription charges are applied correctly prior to medication being dispensed.

The service will enable dispensers to check a Patients' prescription exemption status, resulting in exemptions being applied correctly prior to medication being dispensed, thereby reducing prescription fraud in England which currently stands at £237 million a year.

There are numerous benefits associated with this change, including dispensers benefiting from efficient exemption status checking, due to the digitising of the process,

which will in turn reduce the burden on pharmacy. Any integration with the Prescription Exemption Checking Service must not increase pharmacy activity nor hinder any patient from receiving their medication.

2.1 Architecture

The architecture for the first phase is based on the NHSBSA operationalising an existing service used for checking existing exemptions for patients wishing to purchase a Prescription Prepayment Certificate online. The initial version will be proxied by Spine, allowing existing connections and infrastructure to be used. Later releases are likely to use the same infrastructure services (NHS PKI, SDS), maintain the dispensing system interfaces (SSB, EPS Claim messaging, exemption checking service) but move the API gateway and some associated services into NHSBSA infrastructure.

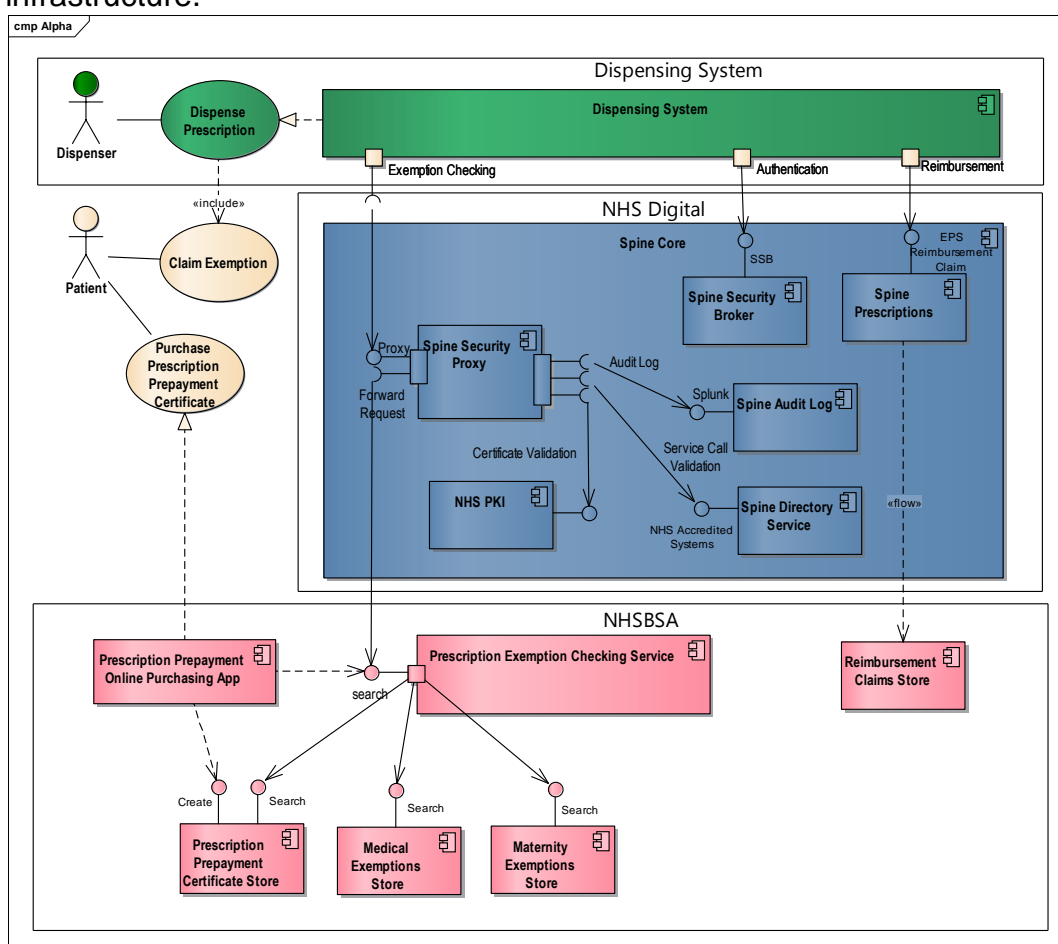


Figure 1: Prescription Exemption Checking Service Phase 1 components

3 Scope

3.1 Client Functional Scope

The following are explicitly **out of scope** for the Prescription Exemption Checking Service:

- Bulk prescriptions
- Prescription charge refund
- Dispensing outside of England
- Dispensing of non-English prescriptions in England
- FP 10 REC
- Home Oxygen Therapy Service

3.2 Service Functional Scope

4 Messaging & Integration

The Prescription Exemption Checking Service is provided as a simple web service. The integration requirements are documented at:

<https://developer.nhs.uk/apis/prescription-exemptions-0-1>

DN: to be updated once API fully documented

Ref	Requirement
PEC-FR-1	Systems must meet the Prescription Exemption Checking Service integration specification.

5 Patient Demographics

The Exemption Checking Service is available to any patient with a known and valid NHS Number obtained from Spine Demographics and whose record is not flagged within PDS with a confidentiality code of “sensitive” or flagged as deceased.

5.1 Synchronisation of Demographics Attributes

For integration with the Exemption Checking Service, a minimum set of patient demographic attributes must be synchronised between the local system and Spine Demographics. These attributes are as follows:

- NHS Number
- Usual name
- Usual address
- Date of birth
- Gender

Telecom contact details, which includes email, are deliberately excluded as they have been found to be frequently updated and inconsistently formatted, resulting in unnecessary synchronisation overhead.

5.2 Demographics restrictions to Exemption Checking

The following scenarios are not permitted to use the Exemption Checking Service

5.2.1 Invalid Values in Demographics Data

Data retrieved from Spine demographics and local systems may not meet data format requirements and must not be permitted to be included in requests to the Prescription Exemption Checking Service. Common examples include non-ASCII characters.

5.2.2 Exemptions for Dead Patients

The System must prevent the checking of exemptions for dead patients. The System must prevent this based upon the data from Spine Demographics or locally: The 'deceasedTime' attribute within the patient's Spine Demographics record holds details of time of death. This requirement applies to both the death status flags within Spine Demographics of 'formally' and 'informally' dead.

In addition, an internal trigger from Spine Demographics will inform the Spine Prescriptions system that a patient has died. On receipt Spine Prescriptions will cancel all outstanding prescriptions for that patient on Spine.

5.2.3 Exemptions for 'Sensitive' Patients

The System must ensure that an electronic prescription cannot be authorised for a patient whose demographic record within Spine Demographics is flagged as 'sensitive'. A demographic record that is sensitive will be identified with a 'confidentialityCode' attribute of "S".

Ref	Requirement
PEC-FR-2	<p>The system must implement Spine demographics synchronisation as described either in:</p> <p>"PDS Compliance Module V3 - Baseline Index" (ref: NPFIT-FNT-TO-TIN-1188)</p> <p>OR</p> <p>ITK PDS Spine Mini Service bundle as described in the document ITK Spine Mini Services Client Requirements (NPFIT-ELIBR-AREL-DST-0408.04)</p> <p>OR</p> <p>"PDS Compliance Module V2 - Baseline Index" (ref: NPFIT-FNT-TO-TIN-1188)</p>

Ref	Requirement
PEC-FR-3	The System <u>must</u> synchronise at least the following patient attributes from Spine Demographics with the local demographic record. <ul style="list-style-type: none">• Usual name• Usual address• Date of birth• Gender
PEC-FR-4	The System <u>must not</u> automatically synchronise patient telecom details with Spine demographics, including 'use' attributes.
PEC-FR-5	The system must only allow prescription exemption checks to take place for patients with demographic records synchronised with Spine demographics.
PEC-FR-6	The System must prevent a prescription exemption check for a patient who is recorded as deceased.
PEC-FR-7	The System must prevent a prescription exemption check for a patient whose demographic record within Spine Demographics is flagged as 'sensitive'.
PEC-FR-8	The System must prevent incorrectly formatted data from being submitted within a prescription exemption check.

6 Authentication & Authorization

All calls to the Prescription Exemption Checking Service must be made by a user authenticated and authorized by Spine, as described by NHS Digital Information Governance requirements and Spine External Integration Specification Part 6. Clients must implement RBAC as defined in the National RBAC Database (NRD), and in order to map the correct activities to roles implementation must include at least the pharmacy-related roles. At version 27.2 of the NRD the following baseline roles are included in the EPS Pharmacy restriction set:

EPS Pharmacy	R8008	Admin/Clinical Support Access Role
EPS Pharmacy	R8004	Healthcare Student Access Role
EPS Pharmacy	R8003	Health Professional Access Role
EPS Pharmacy	R1290	Pharmacist

6.1 Locum Staff

Some users, particularly locum pharmacists may work in many organisations at short notice. Rather than being registered with a User Role Profile (URP) per employing organisation these users can be registered with a single URP associated with a virtual 'National Locum Pharmacy' organisation ODS code (code = FFFFFF). When including organisation details in the request this must be the detail of the requesting organisation rather than from the URP.

Ref	Requirement
PEC-FR-10	The system must implement Spine authentication and Roles-Based Access Control (RBAC) as defined in NHS Digital Information Governance requirements.
PEC-FR-11	The System must implement the Baseline Roles defined in the EPS Pharmacy restriction set of the National RBAC Database.
PEC-FR-12	The System must authorize only authenticated users with the RBAC activity <i>B0820 - Amend Patient Demographics</i> to carry out prescription exemption checks.
PEC-FR-13	The System must only allow users to carry out prescription exemption checks within a current authenticated session.
PEC-FR-14	The System must include the organisation detail of the requesting organisation in authentication headers submitted to the Prescription Exemption Checking Service.

7 Prescription Exemption Checking

The Prescription Exemption Checking Service provides point in time information and so can only be used at the point of dispensing when the patient or patient's representative is asked to pay. Accordingly, it is not appropriate for use to check historical exemptions as required in the case of prescription refunds.

7.1 Initiating a Prescription Exemption Check

The trigger for an exemption check must be based on dispensing activity, which may include creation of a new patient record or at the request of the patient or patient's representative; the system must not poll the Service or call the Service on expiry of an existing exemption. The result of a prescription exemption check must be persisted to the patient record where the result of a check includes an expiry date. Automatically initiated prescription checks should firstly check the patient record for a current

prescription exemption record before calling the Prescription Exemption Checking Service.

A single patient interaction, which may include dispensing several prescriptions may use a single check. The bounds of a patient interaction may depend on the system and dispensing workflow.

7.1.1 Age-Related Exemptions

Age-related exemptions (those children aged under 16 or people aged 60 and over) are out of scope for the Prescription Exemption Checking Service and a prescription exemption check must not be made for these patients. As per the drug tariff, patients whose date of birth is automatically printed out on a hard copy paper prescription or included in an EPS prescription do not need to complete an exemption declaration. Patients with an EPS prescription which does not include date of birth or with hand written prescription forms where the date of birth is inserted manually must continue to make an exemption declaration.

7.1.2 Prisoners on Release

Released prisoners and those released from secure accommodation do not have to pay a prescription charge and a prescription exemption check must not be made for these patients. As per the drug tariff these patients are identified by 'HMP', and the prison or secure accommodation address and telephone number printed in the box provided for the practice address on the front of the form, with the prescribing code and the cost center code for the organisation. These patients do not have to sign the exemption declaration.

7.1.3 Prescriber-managed exemptions

Prescriptions for items where fee exemption is indicated by the medication prescribed and/or endorsement by prescriber such as the CC/♀ endorsement and future exemption for STI treatment are out of scope for the Prescription Exemption Checking Service. Future updates may permit patients not to sign exemption declarations in these cases.

Ref	Requirement
PEC-FR-20	The system must not carry out a prescription exemption check in the case of where the patient is a child aged under 16 or people aged 60 and over.
PEC-FR-21	The system must not carry out a prescription exemption check in the case that the patient is a prisoner on release.
PEC-FR-22	The system must not carry out a prescription exemption check in the case of prescriptions exempt from charges due to the items prescribed or prescriber endorsements.
PEC-FR-23	The System must carry out a prescription exemption check based only on either dispensing activity or the request of the patient or patient's representative.

PEC-FR-24	The system must be able to carry out a prescription exemption check automatically as part of the dispensing workflow at the point of dispensing.
PEC-FR-25	The system must allow automatic prescription exemption checks as part of the dispensing workflow to be configurable as toggled on or off.
PEC-FR-26	The system must allow the user to manually initiate a prescription exemption check.
PEC-FR-27	The system must make the source of patient exemption information clear in the user interface.
PEC-FR-28	The system must not carry out an automatic prescription exemption check where the patient's record contains a current prescription exemption from a previous prescription exemption check.
PEC-FR-29	The system should carry out a single prescription exemption check per patient interaction where the patient's record does not contain a current prescription exemption from a previous prescription exemption check and apply the response to all prescriptions dispensed in that interaction.

7.2 Handling Prescription Exemption Check Responses

Where a prescription exemption is successfully returned by the service this must be applied by default to the prescription. Systems must allow patients to override the prescription exemption service response and select a different or no exemption.

Where a prescription exemption is successfully returned by the service systems should not print dispensing tokens for EPS Release 2 prescriptions by default, unless a schedule 2 or 3 Controlled Drug has been prescribed, in which case the collector may need to sign their name on the token.

In the case of EPS R1 and paper FP10 prescriptions the system should inform the user of the appropriate exemption that an exemption exists, but that the exemption declaration still needs to be signed by the patient or patient's representative. The dispenser should mark the appropriate exemption on the back of the prescription form and must not mark the *evidence not seen* box. The system may alternatively print these selections.

Where no exemption is found the system must indicate that the service has been unable to find an exemption but that an exemption may still exist and the dispenser must defer to the normal exemption checking process.

7.2.1 Failed Calls to Prescription Exemption Checking Service

The prescription exemption service is built to offer a high degree of availability but as it does not provide clinical data, and failure will not have clinical impact or prevent the patient from receiving prescribed items it is not necessarily hosted to the same

standard as, for example, the Spine EPS components. Systems must gracefully handle failed prescription exemption checks in a way that ‘fails fast’ and does not delay the user or disrupt dispensary workflow. The paper exemption declaration and any pre-existing exemption evidence must continue to be available.

7.2.2 Audit Logging

A system audit log recording and monitoring which users performed which action on which resources is required to meet information governance requirements. Prescription exemption checks are to be included in this log.

Ref	Requirement
PEC-FR-35	Systems must apply current prescription exemptions returned by an exemption check to prescriptions by default.
PEC-FR-36	Systems must allow the user to override the prescription exemption check response at the request of the patient or patient’s representative and select a different or no exemption.
PEC-FR-37	Systems should not print dispensing tokens by default for EPS Release 2 prescriptions where a prescription exemption check shows an exemption and a Schedule 2 or 3 Controlled Drug has not been prescribed.
PEC-FR-38	Systems should print the appropriate exemption on the reverse of EPS R1 and non-EPS FP10 prescriptions where a prescription exemption check shows an exemption.
PEC-FR-39	Systems must inform the user that a prescription exemption applies and that further evidence is not required where a prescription exemption check has shown an exemption applies.
PEC-FR-40	Systems must not indicate to the user that no exemption <i>exists</i> where a prescription exemption check shows no exemption is <i>found</i> .
PEC-FR-41	Systems must prompt the user to obtain an exemption declaration including signature where a prescription exemption check shows no exemption is found.
PEC-FR-42	Systems must prompt the user to obtain an exemption declaration including signature where a call to the Prescription Exemption Checking Service fails.
PEC-FR-43	Systems must inform the user where a prescription exemption check has been successful and that they need not obtain an exemption declaration unless the patient chooses to override the exemption.
PEC-FR-44	Systems must include prescription exemption checks in scope of the system audit log.

7.3 Updating Patient Record

Some exemption types include an expiry date for the exemption. Where this is present the system should retain a record of the exemption and apply this to any subsequent prescriptions dispensed until that date, inclusive of the date itself. Where no exemption is found this must not update the patient record, for example removing manually entered exemption information.

Where no expiry date is returned the exemption information returned should be applied to other prescriptions in the same patient interaction, but this must not permanently update the patient record.

An update must be able to be manually initiated prior to the expiry date at the patient's request. Systems must also allow an exemption record to be removed.

Ref	Requirement
PEC-FR-45	Systems must update the patient record with exemption information, including expiry date where the prescription exemption check response includes an expiry date.
PEC-FR-46	Systems must not permanently update the patient record with exemption information where the prescription exemption check response does not include an expiry date.
PEC-FR-47	Systems must not update the patient record where the prescription exemption check returns no exemption found.
PEC-FR-48	Systems must allow prescription exemption information to be removed from the patient record.

8 Prescription Reimbursement Claims

Prescription exemption information retrieved from the Prescription Exemption Checking Service must be distinguished from exemption information retrieved from the patient in reimbursement claims to the Pricing Authority in order to focus counter-fraud effort.

8.1 EPS Claim Message

The existing EPS Claim Interaction is to be used when submitting reimbursement claims with exemptions confirmed by the Prescription Exemption Checking Service. In order to differentiate patient exemptions confirmed by the Prescription Exemption Checking Service an extended *PrescriptionChargeExemption* vocabulary will be used for indicating patient prescription charge exemption. This vocabulary is included at Annex A.

Prescription exemptions must current at the point where the patient is asked to pay for the prescription. As a prescription exemption check only reflects the patient's exemption at the point in time at which it is carried out it is meaningless unless run at

the point at which the patient is asked to pay. EPS Claim messages may be sent at any point up to the fifth day of the month following the month in which the prescription was dispensed (the Claim Period), and so it is common practice for prescriptions not to be claimed until some time after dispensing to allow for endorsement. As such although prescription exemption check results are included in the Claim message is isn't appropriate to carry out prescription exemption checks at the point of claiming.

Claim amendments allow a previous EPS reimbursement claim to be replaced within the same Claim Period. As such if claim amendments are sent to correct a claim message sent for in error prior to dispensing then it would be appropriate to carry out a prescription check and include the result in an amended claim. In the case of updating other details in the claim or amending the patient's exemption other than at the point of dispensing a systems must not carry out a prescription exemption check.

8.2 Claims for Paper Prescriptions

EPS R1 and paper FP10 prescriptions are reimbursed by submission of the prescription form, so there is limited opportunity to indicate where a prescription exemption has been confirmed by the Prescription Exemption Checking Service. A response from a prescription exemption check provides evidence that an exemption exists and therefore the dispenser need not ask for further evidence or mark the *evidence not seen* box. The prescription must still be submitted to the reimbursement authority with exemption declaration captured and signed where appropriate for paper prescriptions, even where exemption information has been confirmed through a prescription exemption check.

Ref	Requirement
PEC-FR-50	Systems must implement version 03 of the <i>PrescriptionChargeExemption</i> vocabulary
PEC-FR-51	Systems must use any value returned in a prescription exemption check as the Charge Exempt value in reimbursement claims for EPS R2 prescriptions unless the patient or patient's representative choses to declare a different exemption.
PEC-FR-52	Systems must not carry out a prescription check when amending claims for EPS prescriptions unless the amendment is being made at the point of dispensing.

Annex A: PrescriptionChargeExemption vocabulary

Assigned OID: 2.16.840.1.113883.2.1.3.2.4.16.33

Describes possible reasons for someone not having to pay prescription charges.

The age exemption category (0002 and 0004) will be calculated by the system based upon the patient's date of birth contained within the prescription message. Message code 0001 is dependent upon the value entered for medication payment charge codes.

This will generally be present in an Observation act where the code attribute has an id value of “EX” from the Prescription Annotation vocabulary.

Values:

Version:	03
Date:	27 June 18

Value	Description	Note
0001	Patient has paid appropriate charges	
0002	is under 16 years of age	
0003	is 16, 17 or 18 and in full-time education	
0004	is 60 years of age or over	
0005	has a valid maternity exemption certificate	
0006	has a valid medical exemption certificate	
0007	has a valid prescription pre-payment certificate	
0008	has a War Pension exemption certificate	
0009	is named on a current HC2 charges certificate	
0010	was prescribed free-of-charge contraceptives	
0011	gets income support (IS)	
0012	gets income based Job Seeker's Allowance (JSA (IB))	
0013	is entitled to, or named on a VALID NHS tax credit exemption certificate	
0014	has a partner who gets Pension Credit Guarantee Credit (PGCC)	
0015	Patient does not need to pay the prescription charge	This allows the exemption status to be recorded without actually stating the reason for the exemption.
9003	is 16, 17 or 18 and in full-time education - confirmed by source	
9005	has a valid maternity exemption certificate - confirmed by source	

9006	has a valid medical exemption certificate - confirmed by source	
9007	has a valid prescription pre-payment certificate - confirmed by source	
9008	has a War Pension exemption certificate - confirmed by source	
9009	is named on a current HC2 charges certificate - confirmed by source	
9011	gets income support (IS) - confirmed by source	
9012	gets income based Job Seeker's Allowance (JSA (IB)) - confirmed by source	
9013	is entitled to, or named on a VALID NHS tax credit exemption certificate - confirmed by source	
9014	has a partner who gets Pension Credit Guarantee Credit (PGCC) - confirmed by source	
9015	Patient does not need to pay the prescription charge - confirmed by source	This allows the exemption status to be confirmed without actually stating the reason for the exemption.
9016	gets Universal Credit (and meets eligibility criteria)	