



Civil Contracts Consultative Group (CCCG) Minutes

11 March 2020

Date:	Wednesday, 11 th March 2020		
Where	The Law Society, 60 Carey Street, London WC2A 2JF		
Chair	Chris Minnoch - LAPG		
Minutes	Grazia Trivedi – Service Development [LAA]		
Present	Ann-Marie Jordan – Analytical Services [LAA] Avrom Sherr – Peer Review Chris Walton – Shelter [TC] Claire Blades – CAB [TC] Eleanor Druker – Service Development [LAA] Hilary Tabita – CEO office {LAA} Kerry Wood – Commissioning [LAA] Louise Parcell – Contract Management [LAA] [T Malcolm Bryant-Exceptional Complex Cases [EC] Nimrod Ben Cnaan - Law Centres Network Paul Seddon-Association of Cost Lawyers [ACL] Russell Barnes – Communications [LAA] [TC]		
Apol	Kathy Wong – BC Richard Miller – Head of Justice [TLS]	Nick Lewis – MHLA Carol Storer – A2J	

1. Update on COVID 19. J Fiddian said that The Legal Aid Agency had robust business continuity plans in place to ensure their key operations could continue. The MOJ had set-up a Departmental Operations Centre, which was working with other government departments to ensure best practice was shared across the justice system. Contract Managers would be raising awareness of the importance of flu pandemic contingency plans with providers. The LAA recognised that providers were having to deal with a great deal of uncertainty and would do everything to help them and their clients.

The LAA finance team were discussing measures that could mitigate the financial impact the COVOID-19 crisis might have on providers' cash flow, such as recoupment delays. Meetings were taking place to discuss contingency measures for situations where a client or a provider may not wish/be able to attend court plus a review of the current arrangements where face to face provided for example advice at IRCs and HPCDS. E Druker pointed out that the situation was fluid and likely to change from day to day.

P Seddon asked whether the LAA were considering flexibility in relation to deadlines they set providers, such as:

- providers/legally aided parties replying to requests for information before a certificate was suspended under show-cause,
- the 28-day deadline to make an appeal on an assessment of claim for costs carried out by the LAA.

Post meeting note: para 6.72 of the Specification to the 2018 Standard Civil Contract

J Fiddian said that these points would be added to the list of measures to be considered **Action** 1 [March].

- 2. New Legal Aid Minister. J Fiddian said that the new Parliamentary Under Secretary of State for legal aid, Alex Chalk, had a really good feel for the legal aid environment as a criminal barrister and was very keen to look at how to improve provision for early advice as a means of helping people resolve their problems before they escalated.
- **3.** <u>Minutes</u> and actions. Due to problems opening embedded documents into the minutes it was agreed that documents would be included separately. The name of Nimrod Ben Cnaan had been written incorrectly and would be rectified.

Action 1-4 and 7 had been closed.

Action 5. The Links were all published on the Gov.uk website however the LAA would sign post them from the following month.

Action 6. See below under 6.3

4. Immigration.

Update on legal fees in relation to HMCTS reform and appeal tribunal. A new additional fee for the new stage in the revised process would likely be introduced in Sep-Oct but would require legislation. The policy team were keen to take on board the rep bodies' views and so would consult with them before implementing the changes.

LAA's response to the Detention Action letter sent to E Druker by ILPA and Bail for Immigration Detainees [BID] on 18th Dec '19. E Druker had sent a response to the letter from

ILPA and others and in addition there had been a meeting with E Druker, K Wood, ILPA, Detention Action, The Law Society and BID to discuss the response and consider requirements for future contracts. Another meeting would take place in a week's time to discuss. S Lenegan said that ILPA would send another letter the following week to seek clarification on what was/wasn't possible under the current contract.

5. CLA statistics. The LAA aimed to get information on the full journey through the CLA process, from the first contact with the operator service to opening the matter start. The stats currently available only provided some of the information needed so more work was being done to extract more data.

A-M Jordan said the only information published on the initial contact with the telephone operating service was its cost; this could be found in the stats pack in Table 1.2.

Within the published tables more information could be found on the specialist telephone advice service (Tables 5.1, 5.2 and 5.3), however the data was within the directive of legal help so it was not possible to know what related to the specialist service. The LAA published two csv files. The first was the detailed civil data, which covered the specialist telephone advice service's closed/completed cases by case type (including detailed case type), volumes and value by financial year and quarter. Outcomes and reasons for determination of closed cases was also published. A-M Jordan would share an example of this file **Action 2 [Mar]**

The second csv file was called Main Data File and it included all the crime and all the civil data. This had the telephone operator service values by financial end of year and quarter, which was now discontinued for reasons mentioned below. For the specialist advice service there was data on starts by case type, and completions by case type, outcomes and determination reasons.

<u>Post meeting note</u> the stats team is now unable to continue publishing this cost due to a change in how the service is run by the provider. This came to light in recent weeks and was not known at the time of the CCCG. The provider of the service now runs two services: CLA TOS and DSCC which is a crime service. They are no longer able to separate the management running costs between the two services as they are contracted as one service, and the cost is reported all in one now. A-M is happy to give more detail on this if anyone in the group wants to know more. Historic data up to July-Sep 2019 is still available in Table 1.2.

E Druker said that stats were also gleaned off the CLA Case Handling System which were difficult to publish since they involved manual extraction and manipulation of the data. N Ben Cnaan would feedback his views to E Druker after receiving the note [below] **Action 3 [Mar].**

<u>Post meeting note</u>: E Druker shared the data taken from the CLA Case Handling System and HGS telephony platform for the month December 2019:

Contacts Handled (Calls into Operator Service)		
Calls Answered	5,157	
Call backs returned	1,444	

Count of Cases created in the Case Handling System.

Outcome			
Closed at Operator Service	Open/ Ongoing	Referred to CLA Specialist	Grand Total
3384	602	1674	5660

The above figures represent a snapshot of the last outcome code used for all cases created in December 2019. The outcome codes have been grouped into three Categories:

- Closed at Operator Service
- Open/Ongoing
- Referred to CLA Specialist

Examples of the status of each matter within these categories were:

Outcome	Example of Outcome type
Closed at	Referral from knowledge base, alternative help, i.e. matter not in scope
Operator Service	for legal aid or client not financially eligible so referred to alternative organization (e.g. non LAA funded helplines)
	Client signposted to face-to-face advice provider – either due to client choice (housing and family matters), due to category of law (e.g. mental health or immigration) or ineligible for legal aid but willing to pay privately
	Client declines info from knowledge base
	Insufficient Information, i.e. client has been unable to complete the financial assessment and needs to call back at a later date
	OS end call due to client behavior
Open/Ongoing	Call Back, i.e. operator attempting call back and unable to reach client. Will schedule another call back
Referred to CLA	Case Opened by Specialist
Specialist	Client advised and case closed by Specialist

There was discussion about whether it was preferable to differentiate by category of law than outcome code. It was agreed that more analytical work needed to be done and that farther discussion could take place outside of committee.

6. LAA Updates

6.1 Contract Management and Assurance L Parcell had shared a briefing note with a Provider Activity Report [PAR] and a Proposed PAR with CCCG prior to the meeting. L Parcell talked the group through the proposed changes that the team felt would add value to providers in monitoring their performance. The first new PAR would go out in mid-April.

Rep bodies offered some suggestions to improve the PAR such as adding a Date Parameter Explanation against the Allowed Quantity/New Matter Starts Reported. There were questions around the RAG ratings for KPIs 6 and 7; L Parcell answered these questions and added that providers could get clarification from the guidance provided with the PAR and/or their contract manager. L Parcell to share the guidance with CCCG. **Action 4 [Mar] – see appendix** The LAA planned to keep providers fully informed about the changes.

Rep bodies asked if the guidance clearly explained the significance/consequence of a red RAG. L Parcell explained that a red RAG didn't necessarily mean intervention from the LAA or that there was a problem; it could mean that a little more focus was needed or a conversation with the contract manager. Rep bodies were in favor of using amber rather than red.

6.2 Operations. S Starkey said that, following feedback from rep bodies about the current operational performance report provided, he and his team had put together a Shadow Pack to share alongside the old-style ops report. The pack contained tables of data, graphs, links to guidance, hints and tips, explanations and glossary. The data in the pack would be used to flag trends and actions that could be taken to address the issues identified, thus helping to reduce unnecessary rejects and appeals for instance. An example of an action taken internally of this was the extra tier of quality control that had been recently put in place by the billing teams to ensure caseworkers rejected/returned claims correctly first time. Data from the Civil Claim Fix service, i.e. the challenges against rejects & document request, was also included in the pack so you could see both the overall number of challenges received as well as their outcomes. C Minnoch said that many providers didn't challenge decisions because they were not paid to do that work so it was likely that the caseworkers' error rate was higher; the Process Efficiency Team was looking into this issue.

The information in the Shadow Pack currently related to certificated billing only but would be extended to include data on Escaped Cases for next CCCG in May. V Ling said that Resolution members had complained about the LAA's soft reject approach because when a claim was returned to the provider due to missing information, they asked for all the documents to be resubmitted, rather than asking for just the ones that were missing. S Starkey to look into this issue **Action 5 [Mar]**

A typo was spotted in the pack whereby the Civil Finance Electronic Handbook was referred to as the Electronic Civil Finance Handbook **Action 6 [Mar].**

Rep bodies liked the Shadow Pack and hoped that information on applications, means and merits would be included too. They asked whether the very high level of rejects due to missing disbursement vouchers were mostly attributable to a particular claim area – either claim type or matter type. S Starkey said that it was across the board and that most of the rejects were attributable to a smaller number of firms that consistently failed to provide information. Rep bodies asked whether the value of the Disbursement was a factor. S Starkey said that he'd see

whether more information could be obtained on this specific aspect in the next pack. **Action 7** [Mar]

Rep bodies asked how did the PAR help flag to a contract manager or a provider that there was a problem with the reject rate. **Action 8 [Mar]** - see post meeting note below.

6.3 Exceptional and Complex Cases Team [ECCT]

ECF User Research User Research was undertaken on behalf of MoJ and it produced feedback on the Exceptional Case Funding [ECF] scheme; the LAA were always working to improve the scheme by way of the information they provided especially keeping in mind the vulnerable clients' needs. ECF team would be considering what to do next.

The Process Efficiency Team [PET] were to start work on improving the way Immigration case plans worked. M Bryant explained that non-family case plans were the remit of ECCT and family case plans were dealt with by the Very High Cost Cases [VHCC] team; family case plans had been simplified by PET.

ECCT data - Case Plans from 1st April ECC process data would be published, including information on case plans and the team would share the information with CCCG by way of a written report in advance of the meeting.

From ECCT management information (February 2020), the Work in Progress (WIP) in relation to CCMS cases stated that the oldest case was 27th January 2020. In relation to CIS the oldest case was 13 February 2019; this case was in relation to a billing issue that needed ECCT to agree information regarding a case plan bill submitted.

The number of ECCT case plans on the WIP record was low: 235 in total of which 43 were on CIS; 174 of those were in week 1-5 and 61 were outside target. M Bryant explained that CIS cases could be still live but have no transactions on WIP; they just need closing. So, to identify all CIS cases where there maybe case plan activity, a proxy had been used for any CIS case that had been opened with a cost limit of £25k.

Immigration CIS Case Plans There were 330 such cases; some had had no activity for a long time and the team were working to find out why that was. The provider should have reported the outcome of the case to the LAA in order that it could be closed correctly and payments reconciled if necessary.

Three firms were responsible for 100 of those cases. A project had started in relation to immigration CIS case plans whereby Claim1s were going to be accepted in lieu of case plans. If a provider wished to submit a bill rather than continue to negotiate with a case plan, they had to do so via their contract manager.

Cases were not going to be reopened when a case plan or case plan stage had been agreed. This approach aimed simply to resolve and close CIS cases that had been opened for a long time and where the underlying funding matter had closed.

Performance outside Case Plans Exceptional Case Funding [ECF] performance was strong; it was currently measured in caseworker's time rather than end-to-end time because of the unique

type of work which included ECF direct clients, inquests, more complicated cases, no emergencies.

With regards to direct clients the team had adopted a soft reject approach as it was difficult for these clients to understand the informational/evidential requirements.

In 2019-2020, 325 individuals applied for funding through a charity (non-lawyer) and 340 on their own.

The published LAA stats pack contained a lot of data on ECCT and ECF and should be used as the starting point to measure performance, including grant rates.

From 1st April ECF cases' performance would be measured in end-to-end time, not caseworker time. The team was to focus on finding out how improvements could be made to speed up times and how to reduce requests for information.

C Minnoch asked whether in ECF there was a correlation between self-applications, charity applications and cases moving forward to a conclusion. M Bryant said that when a direct client or charity had gone through the ECF process they did have to then approach a provider who went through the whole process again. So yes, if a direct client was successful there would be 2 applications

The ECF stats differentiated between assisted and not assisted clients. Not all direct clients that had been approved for ECF went on to make an application so that suggested that even if they had been approved for ECF funding they were unable to find a provider to take on their case.

6.4 Commissioning

K Wood said that for a long time there had been concerns about procurement areas [PA] with a low level of supply in housing providers and very low volume of work undertaken. The LAA had previously discussed with the group a possible solution but they had not yet discussed it with the MoJ policy team nor submitted it for ministerial approval so rep bodies were asked not to share this information out of committee for the time being. She explained that in the 20 PAs where low levels of work were being undertaken, it might be possible to look at supervision for housing work being shared with other categories. The challenge in this would be to maintain the quality of supervision as at the previous workshop all had agreed that this was important. Views and feedback from rep bodies would be taken on board before commencing a procurement process.

The rep bodies asked about the plans for further contracts in Discrimination and Education following removal of the mandatory gateway K Wood said that as the telephone service was still in place, additional face to face contracts may not be what the market needed. She talked about several options that would be taken into consideration before a decision was made. C Minnoch asked how many of the 23 discrimination schedules were awarded to providers holding transitional supervisor status. **Action 9 [Mar]**

K Wood said that the removal of the mandatory gateway had been postponed to May but she 'd check and confirm what the new date was. **Action 10 [Mar]**

6.5 Process Efficiency Team [PET] E Druker said that the team were working with LAPG on the survey results. The next area of work for case plans review was in Immigration. C Minnoch said

that non-family providers were asking about a timescale for the extension of the higher initial costs limits. E Druker said that work had started on this and would provide an update postmeeting. **Action 11 [Mar]**

7 AOB

- **7.1 FOI requests.** Rep bodies asked whether the LAA responses to FOI requests would be published. H Tabita said that the LAA had not done so for two years and would have to understand what were the drivers behind the interest to see them published. The task would be resource intensive, the subject of the FOI requests was repetitive thus involving a duplication of the responses. C Minnoch said that if all requests/responses were published and it was easy to search through them, it was likely that new requests would not be made about things that were already in the public domain. H Tabita explained that there was no government guidance on publishing FOIs; it was left to the discretion of each department. H Tabita would look into it and get back to CCCG. **Action 12 [Mar]**
- 7.2 Court Fees. This had been actioned out of committee
- **7.3 LAPG Survey Feedback** PET were meeting the following day to discuss this and an update would be provided to CCCG **Action 13 [Mar]**
- **7.4** J Fiddian asked CCCG to give enough notice when requesting agenda items that require time to prep.

Actions from this meeting		Owner	Deadline
AP 1 [Mar]	Consider adopting a flexible approach to deadlines set providers by the LAA Post meeting note: this is being discussed in the COVID practitioner groups. Most of the issues re. deadlines relate to Court deadlines and this being investigated by HMCTS	J Fiddian/ E Druker	Closed
AP 2 [Mar]	Share examples of data contained in the published csv file on detailed civil cases	A-M Jordan	Closed 20/04/2020
AP 3 [Mar]	Email views on CLA stats to E Druker	N Ben Cnaan	30 Mar
AP 4 [Mar]	Share the guidance that is sent out to providers with the PAR	L Parcell	Closed
AP 5 [Mar]	Look into the LAA's claims soft reject approach whereby all documentation was expected to be resubmitted. Post meeting note: This suggestion is certainly not without its complications. We would be happy however for providers to ask us to rely on documents submitted with one previous bill (so this would exclude multiple reject scenarios). Providers however need to be aware of the following: • The rules for CCMS require that documents are submitted	S Starkey	ongoing

	with each claim. Where providers have submitted all documents on a previous claim that was rejected, they		
	will need to ensure they submit something with the resubmitted claim to enable it to move into the processing queue.		
	 Providers need to ensure that all the documentation required for processing is provided and correct. Due to the two stage approach with checks as detailed in the <u>CCMS checklist</u> we may not have checked for all reject reasons on the previous rejection so providers are encouraged to follow the checklist to avoid further returns. 		
	Providers will need to indicate whether the documents are attached to the current submission or previous submission. We will only check documentation.		
	Probably best that we discuss this one first before changing our approach.		
AP 6 [Mar]	Correct the typo in the shadow pack – the Electronic Civil Finance Handbook referred to in the pack should instead be the Civil Finance Electronic Handbook	S Starkey	Closed
	This correction has been made in the next version of the pack.		
AP 7[Mar]	Find out if more information could be obtained on the value of disbursement vouchers.	S Starkey	Closed
	Post meeting note . The data captured by the system in respect of missing disbursement vouchers does not contain financial information unfortunately, but I can provide the following additional analysis in terms of the make-up of the data.		
	In the three-month period Dec 19 - Feb 20		
	 There were 1,960 recorded instances of missing Disbursement vouchers Average 653 per month 		
	 25 firms accounted for 20% (384) of the total missing vouchers On the list there are 686 firms in total 		
	 Highest firm had 66 missing vouchers recorded (3% of the Overall total) 		
	• 532 (78%) Firms had 3 or less missing vouchers (so average of only 1 per month)		

AP 8 [Mar]	Inform CCCG how the PAR helped flag to a contract manager or a provider that there was a problem with the reject rate.	L Parcell	Closed
	Post meeting note KPI4b requires the number of Claims rejected [by the LAA] to be less than 5% of all submissions made by a provider, the Provider Activity Report is rag rated to reflect when this is exceeded significantly (i.e 15% or more).		
	We may consider Rag ratings as part of a wider review of PAR in the future.		
	In line with our published guidance that we are reducing the levels of contract administration to allow providers to focus on supporting their clients, no contact management activity will be undertaken in relation to a providers' performance under this KPI at this time. This postponement will apply until 30 June 2020 but we will keep this under review on at least a monthly basis and amendments may be necessary, based on wider Government advice.		
AP 9 [Mar]	Find out how many of the 23 discrimination schedules were awarded to providers holding transitional supervisor status Post meeting note: [15 April] 10 providers gave us transitional supervisor declaration forms. 59% had met the traditional standard in discrimination and 55% in education [as reported at the November CCCG]	K Wood	Closed
AP10[Mar]	Check the date when the mandatory gateway would be removed Post meeting note [15 April] We don't have a formal date yet for the SI but it is expected shortly	K Wood	Closed
AP 11 [Mar]	Provide an update on the extension of the higher initial costs limits for non-family suppliers. Post meeting note: this was discussed at the LAPG workshop to discuss the survey results and Anthony Evans confirmed it is being looked at	E Druker	Closed
AP 12 [Mar]	Look into the feasibility of publishing FOI requests/responses	H Tabita	Taken forward
AP 13 [Mar]	Feedback on LAPG survey	K Pasfield/C Minnoch	13 May

Legal Aid Agency

Provider Activity Report Guidance

Provider Activity Report (PAR) - overview

PAR is a collection of key information about your performance under your contract/s.

It brings together a variety of data from your returns to the LAA, which illustrates how you are performing against contractual requirements and other areas of interest. The Firm Overview report contains data for each of your contracted offices.

How to review your Firm Overview report

The report shows the date that the information in the report is accurate to - any claims or amendments made after this date will not be reflected. It also includes details of the time periods that have been used for each indicator.

If you have any queries or would like to discuss your report further, please contact your Contract Manager. However, please note that your Contract Manager will share further details of individual claims and breakdowns of data if there is a concern regarding performance. If there are not concerns, we will be unable to provide regular breakdowns of the underlying claims data and would refer you back to your returns to the LAA as this is the information PAR is based on.

Current Contract Status: Civil & Crime

Sets out the status of contracts held with the LAA.

Fund Take: Civil

Value of claims authorised, Legal Help and Certificated for 2016/17 and projected value for 2017/18* (updated quarterly using published Legal Aid Statistics). Percentage change shows % increase (or decrease) in projected 17/18 fund take compared with 16/17.

*using a 'straightline' projection: Q1 actual value x 4 = projected full year value, Q1+Q2 actual x 2 = projected full year value.

Claim 1 Rejects: Civil

Claim 1 rejects rate percentage Year To Date (YTD) and current month (total rejects versus total Claim 1s (Bills) submitted). Standard Civil Contract 2013 specification 2.64 KPI 4, Standard Civil Contract 2015 specification 2.61 KPI 4.

Contract Sanctions: Civil & Crime

Number of Contract Sanctions and Contract Notices issued since April 2015.

Reconciliation Standard Monthly Payment (SMP): Civil & Crime

If paid via SMP, the balance owed when the latest claim and payment are aligned.

If the percentage is greater than 100% it indicates an underpayment whereas if the percentage is less than 100% it indicates an overpayment.

Reconciliation Variable Monthly Payment (VMP): Civil & Crime

If paid by VMP, the balance owed outside of the current VMP arrangements. A positive figure indicates a balance owing to the LAA. A negative figure indicates a balance owing to you.

UPOA (Unrecouped Payments on Account): Civil

Total value of payments on account made. Total value of solicitor UPOA excludes POAs made directly to Counsel. This value is then shown as a percentage against the projected certificated fund take for the current year, to show the proportion of POAs that have already been made versus the annual claim value. The percentage of solicitor POAs on cases where no activity has been recorded in the last 2 years is also shown, along with the percentage of POAs on cases that have been reported to us as dead, but no final claim has yet been received. (Nb. These 2 measures are not mutually exclusive – a case can be dead **and** have had no activity on it for 2 years or more. In these cases, the POA will be counted in both the '2 year' and 'dead' measure).

KPIs (Contractual Key Performance Indicators): Civil

Latest Peer Review result and date: A rating of 4 or 5 will have a RAG rating of 'Red'.

KPI 2 Licensed work assessment reduction. Assessment Reductions on Claim 1 assessed bills. Total value allowed versus total value claimed determines the assessment reduction RAG and percentage.

Measured by category in accordance with KPI (Standard Civil Contract 2013 specification 2.59 KPI 2). RAG rating will be red if the percentage exceeds 15%.

KPI 6 Quality: Legal Representation outcomes. Applies to Clinical Negligence and Actions Against the Police categories only. You must achieve a Substantive Benefit for the Client in at least 30% of cases (measured in accordance with Standard Civil Contract 2015 specification 2.63 KPI 6).

KPI 7 Quality: Post Investigation Success. You must achieve a Substantive Benefit for the Client in at least the following proportion of cases: Actions Against the Police 50%; Clinical Negligence 60% (measured in accordance with Standard Civil Contract specification 2.64 KPI 7).

Designated Accredited Representatives (DAR). The provision that needs to be measured is the requirement that providers must use individuals known as "Designated Accredited Representatives" to represent clients at 50% of the Mental Health Tribunal hearings they carry out over any schedule period.

Fund Take: Crime

Value of claims authorised, Crime Lower & Higher, 2016/17 and projected value for 2017/18* (updated quarterly using published Legal Aid Statistics). Percentage change shows % increase (or decrease) in projected 17/18 fund take compared with 16/17.

*using a 'straightline' projection: Q1 actual value x 4 = projected full year value, Q1+Q2 actual x 2 = projected full year value.

KPIs (Contractual Key Performance Indicators): Crime

Latest Peer Review result and date: A rating of 4 or 5 will have a RAG rating of 'Red'.

KPI 1 Assessment Reduction %: Total number of CRM7s assessed and number where costs were assessed down. The assessment reduction percentage is calculated using total costs requested versus total costs allowed (Criminal Contract 2017 specification 2.65, KPI 1).

KPI 3 Duty Solicitor Call Centre (DSCC) Virtual Court acceptance rate: Ensure your Duty Solicitors accept a minimum of 90% of the calls you receive to attend a Virtual Court hearing (Criminal Contract 2017 specification 2.65, KPI 3).

KPI 4 Case Conclusion rate: Cases reported as transferred prior to completion compared with total cases reported (Criminal Contract 2017 specification 2.65, KPI 4).

CRM7s Non-Standard Fees: Crime

Total number of CRM7s claims and the total value authorised.

Duty Solicitor Call Centre (DSCC) Acceptance: Crime

KPI 2 DSCC Acceptance: Number of cases offered and accepted (rolling 3 months) and the percentage offered vs accepted (Criminal Contract 2017 specification 2.65, KPI 2).

Criminal Standard Fees: Crime

Percentage of Lower, Higher and Non-Standard fees claimed and the total volume of Standard / Non-Standard Crime Lower claims submitted.

Eforms (Rejects): Crime

Number of Eforms submitted and rejected - current month and YTD – and the percentage reject rate YTD.