

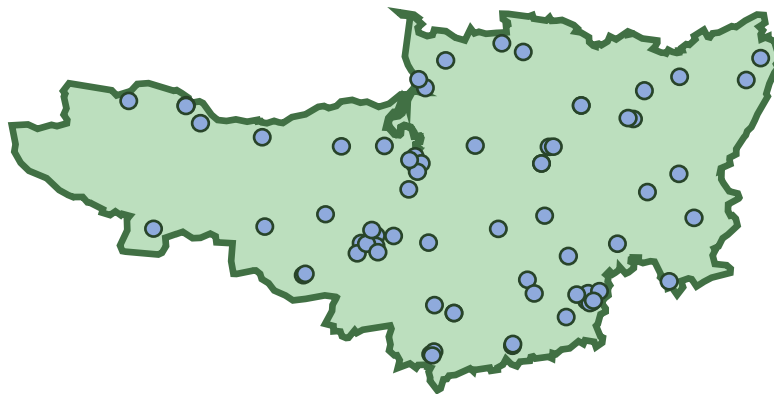


Benchmarking Network

Primary Care Project

NHS Somerset CCG (11X)

- Comparative analysis to support CCG management of Primary Care services, using 2016/17 data.
- This project uses data from national data sources and a supplementary bespoke data collection.



Key: ● GP Practice

NHS Benchmarking Network
Bespoke report - May 2018





Primary Care Project

Bespoke report - May 2018

Contents

Section	Page
Contents	2
Introduction	3
Part A - Primary care services in the CCG area	5
CCG overview	6
GP practice & GP numbers overview	7
GP practices premises	9
GP workforce	10
Pharmacy services	14
Enhanced services	16
Finance	20
Patient experience	22
Example GP practice level comparisons	24
Part B - Work for the CCG primary care team	26
CCG primary care team service model & structure	27
GP practice review meetings	29
CCG primary care team	30
CCG primary care team processes	32
Conclusion	33
Next Steps	35
Appendix	36



Benchmarking Network

Introduction

Welcome to the Primary Care pilot bespoke report for your CCG

The Primary Care project is a new project by the NHS Benchmarking Network, focused on supporting CCGs (Clinical Commissioning Group) with their commissioning of Primary Care services. This report looks at 2016/17 data.

The aim of the project is to provide lead Primary Care Commissioners and their colleagues with useful information/analysis that supports their work and can inform their decision making. While the project aims to use existing data sources, a short additional data collection was used to examine CCG's processes and other data not available elsewhere. This was kept to a minimum size to reduce the workload required of participants. The project seeks to provide meaningful analysis of this data, to make it useful. A list of publicly available data that was used in this report is included in the appendix section.

History of the project

The project was launched during the 2017 work programme. Following on from our CCG Functions project, the Network approached members about the possibility of running a separate project focusing on Primary Care, and this was well received by members.

During the scoping of the project, a range of national data sources were identified. Over 20 CCGs helped us develop a supplementary questionnaire through emails and telephone calls, with draft questionnaires reviewed by staff within the CCG who work on Primary Care commissioning. This has enabled us to create a questionnaire that focuses on key metrics of interest to the Primary Care team within CCGs.

Current project status

The Network would like to thank the 26 member CCGs that have submitted data via the supplementary data collection for the financial year 2016/17. This has enabled the project to examine issues not touched on by national collections, such as the banding of the Primary Care team within CCGs.

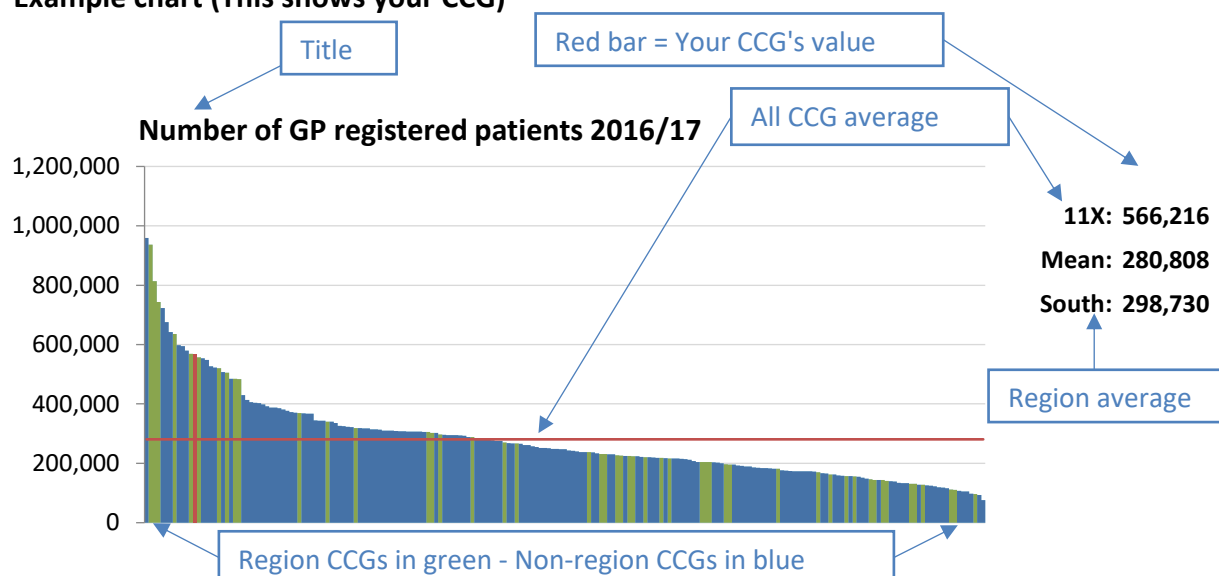
The Primary Care project is going to run in the 2018/19 Network's work programme. A new member of staff, Sue Ikin, will be joining the Network in May 2018 and will be leading on the Primary Care project. Sue will be assisted by Chris McAuley. If you have any comments on the report or the project in general, please contact Chris McAuley (chris.mcauley@nhs.net).



Useful Information

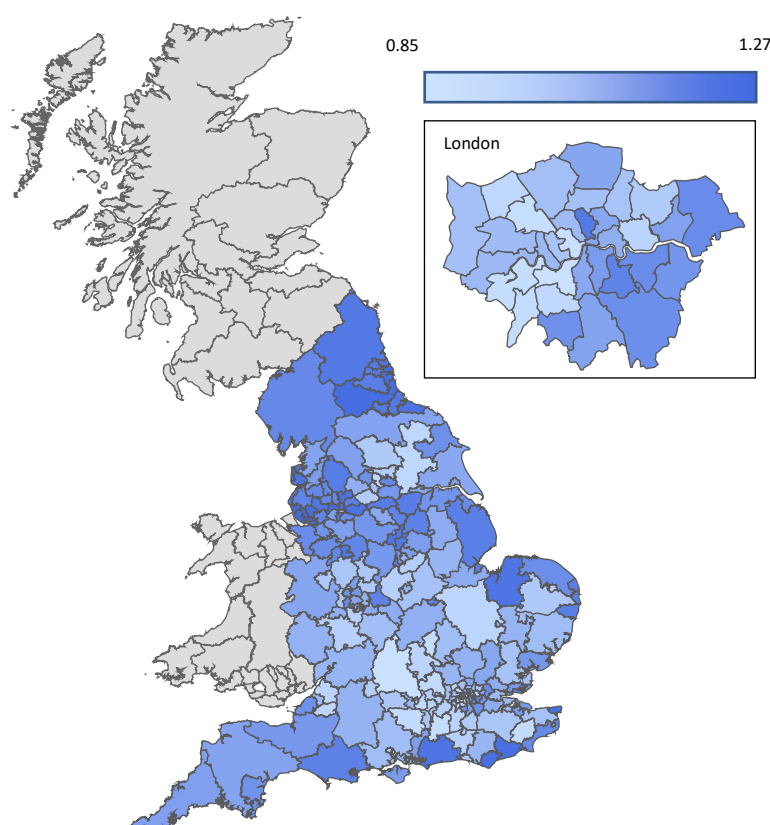
- Throughout the report we use the code 11X to refer to NHS Somerset CCG.

Example chart (This shows your CCG)



Regional peer groups

CCG population weighting - geographic spread



This set of pilot reports uses the following regions as peer groups:

- North
- Midlands & East
- London
- South

These groups have been used as they are readily understood and certain factors such as cost variation, population density and deprivation have regional biases.

The map to the left shows the CCG population weightings, with heavier shading showing a higher weighting. The 'North' can be seen to have more areas with higher weightings than other regions.

This can also be seen on the example bar chart where the 'Northern' CCGs, highlighted in green, are more prevalent on the left (higher) side of the chart.

Future rounds of the work may use other peer groups. This will be based on feedback from participating CCGs.

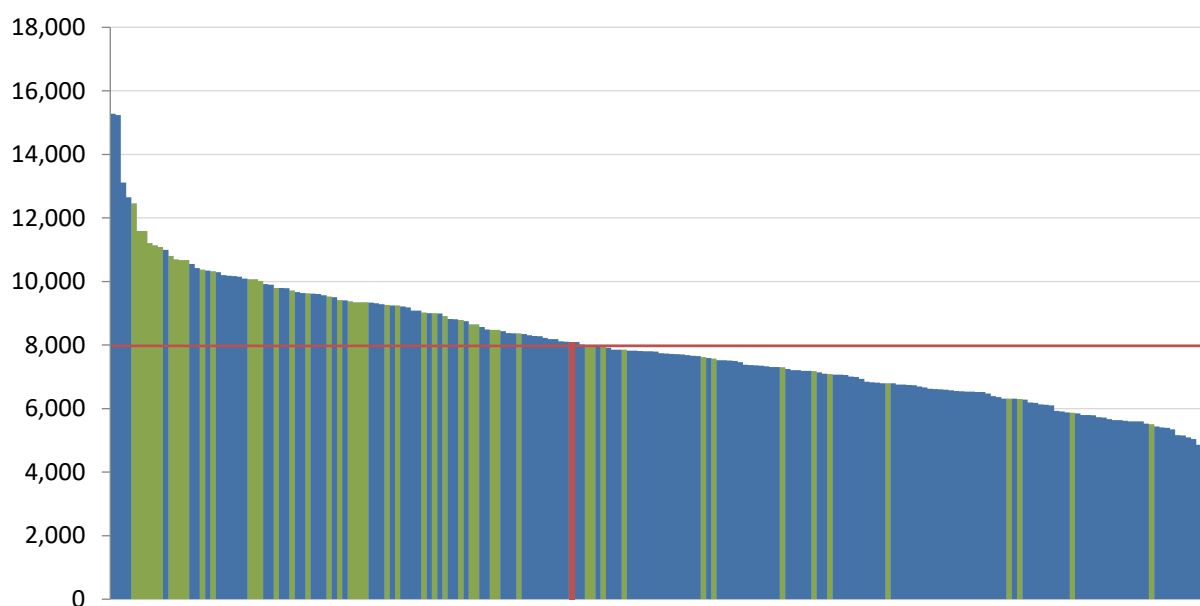


Part A

Primary Care services in the CCG area

The first part of this report looks at the primary care services in the CCG. The data from this section is primarily from national data sources. The main national data sources that are used are NHS payments to GP practices, GP workforce data and the Patient Experience survey. A complete list is included in the appendix.

Average number of registered patients per practice 2016/17





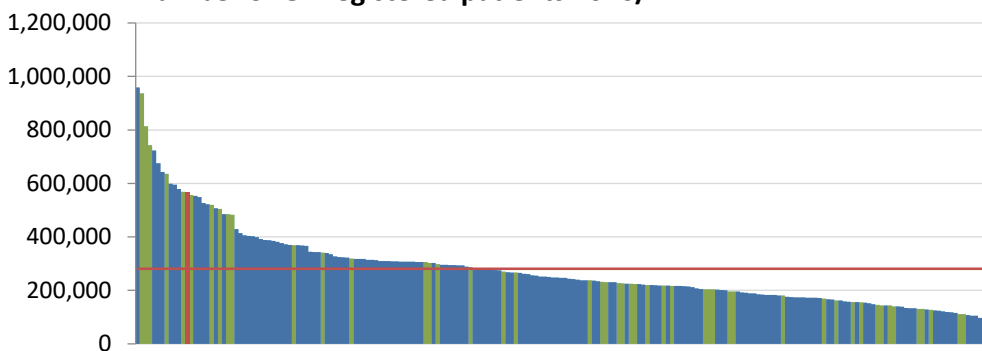
Benchmarking Network

CCG overview

Populations served by CCGs vary in size, demographics and health needs.

There is more than a tenfold variation in the size of the population served by CCGs, ranging from Corby CCG with a GP registered population of 76,190 to Cambridgeshire And Peterborough CCG with a population of 958,822.

Number of GP registered patients 2016/17



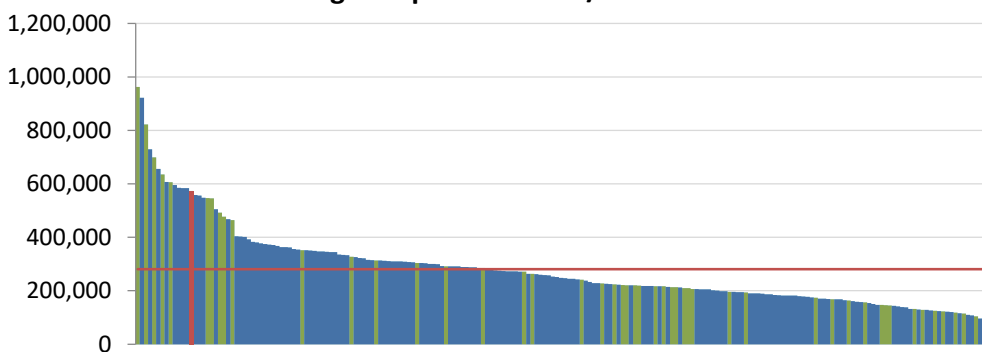
11X: 566,216

Mean: 280,808

South: 298,730

NHS England use weighted population to apportion funding to CCGs. The weightings take into account variation in health needs and costs.

Number of weighted patients 2016/17



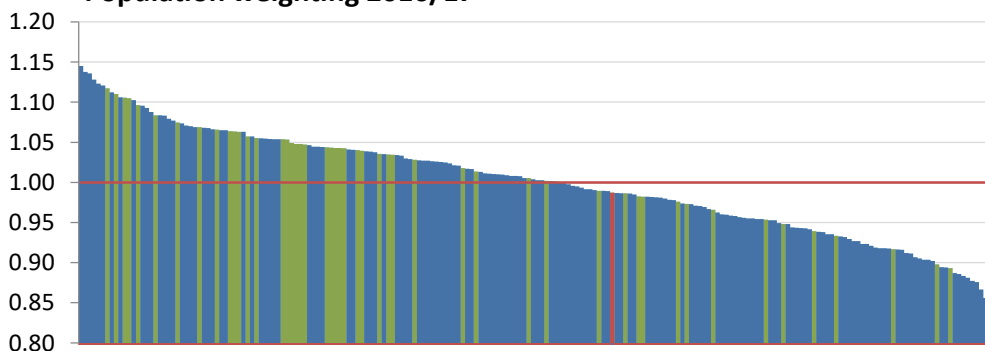
11X: 573,609

Mean: 280,801

South: 294,315

Comparing the weighted and unweighted population enables the weightings used to be viewed. This provides a measure of the challenges posed by the health of the population and local cost factors. The weightings range from 0.84 to 1.14.

Population weighting 2016/17



11X: 0.99

Mean: 1.00

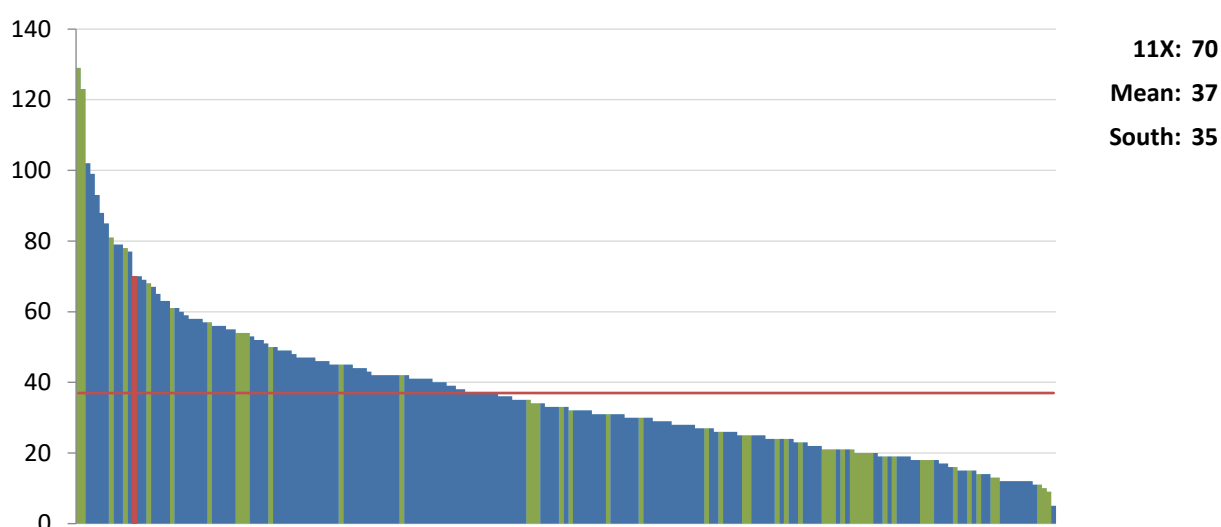
South: 1.02



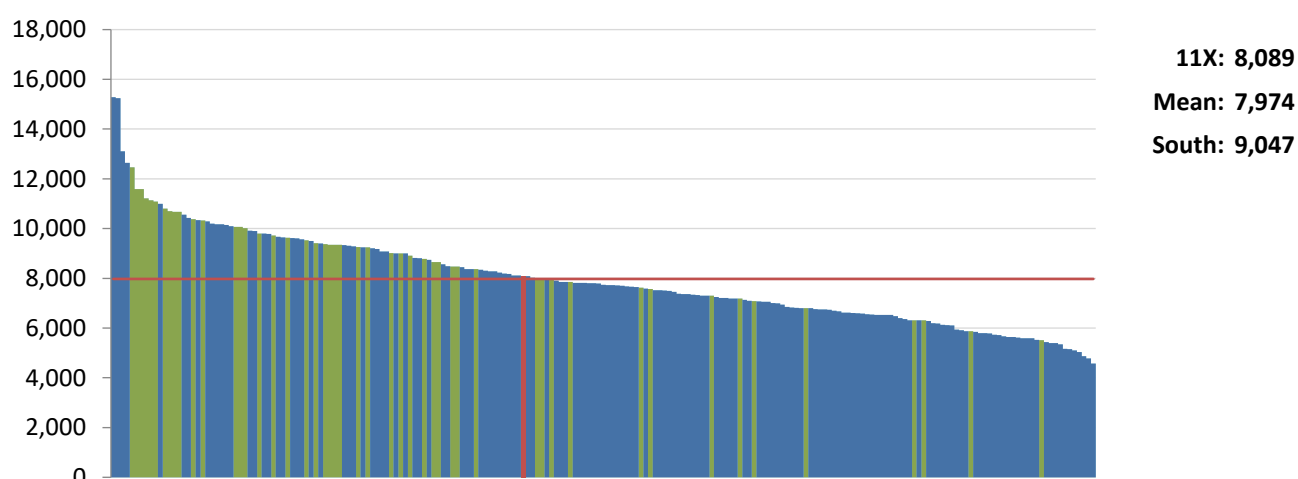
GP practice & GP numbers overview

It is estimated that over half of patient interaction with the NHS is with primary care services. Good primary care supports the whole health system by promoting preventative behaviours, identifying serious health problems early and avoid unnecessary emergency admissions. Conversely problems with primary care will have serious knock-on effects for the rest of the health system.

How many GP practices are there in the CCG?



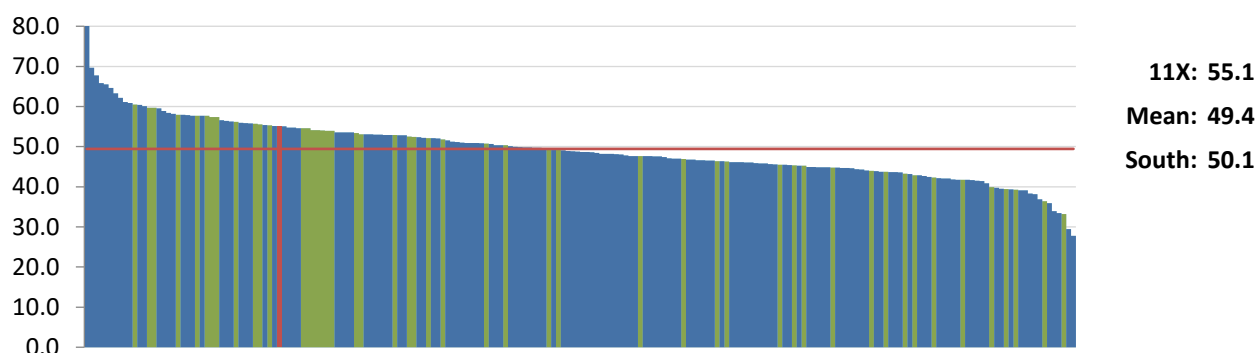
Average number of registered patients per practice 2016/17



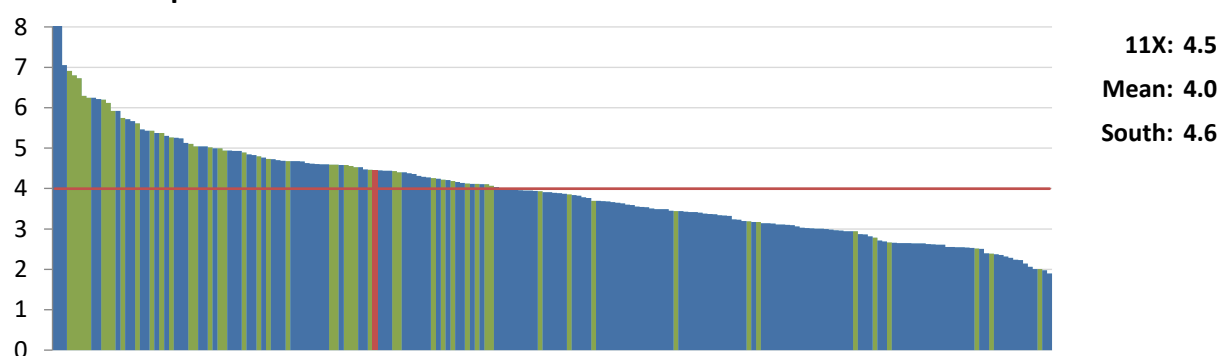


Benchmarking Network

GP WTE per 100,000 registered population

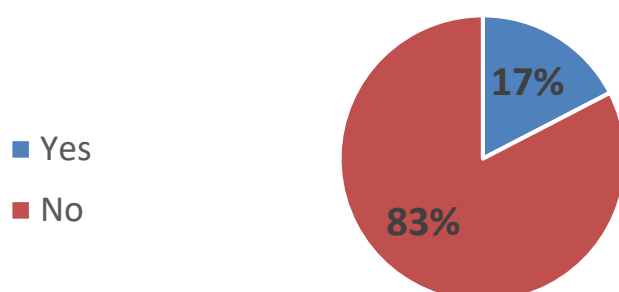


GP WTE per GP Practice



The chart above displays the GP WTE per GP practice. This is a key measure of the nature of GP practices in the area.

Does the CCG monitor the number of GP appointments?



11X: No

There are approximately 340 million consultations with GPs in England each year (BMA, 2017). Understanding the scale of primary care activity can assist in whole system planning and delivery.

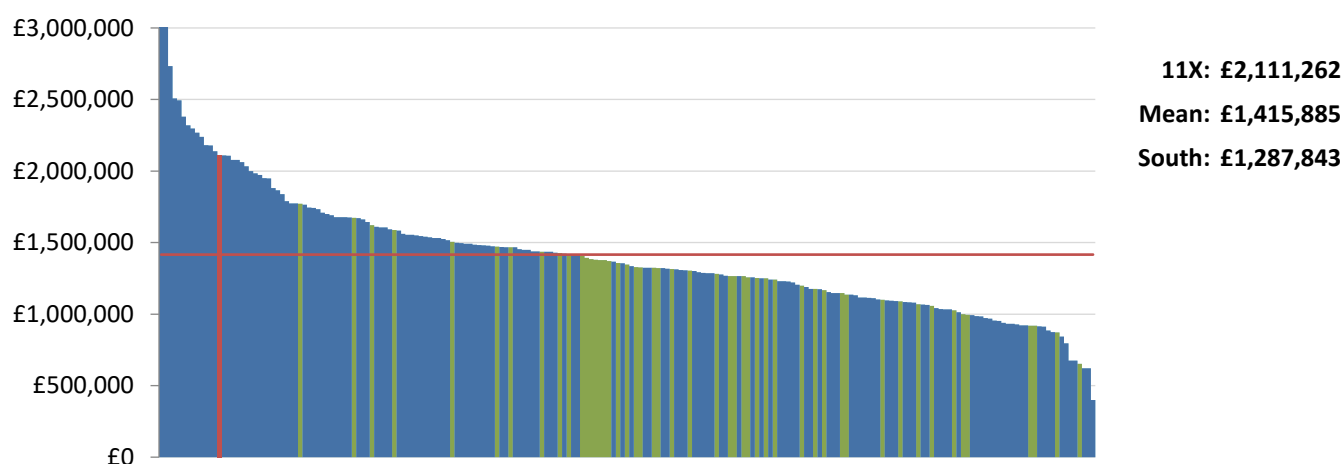


GP practices premises

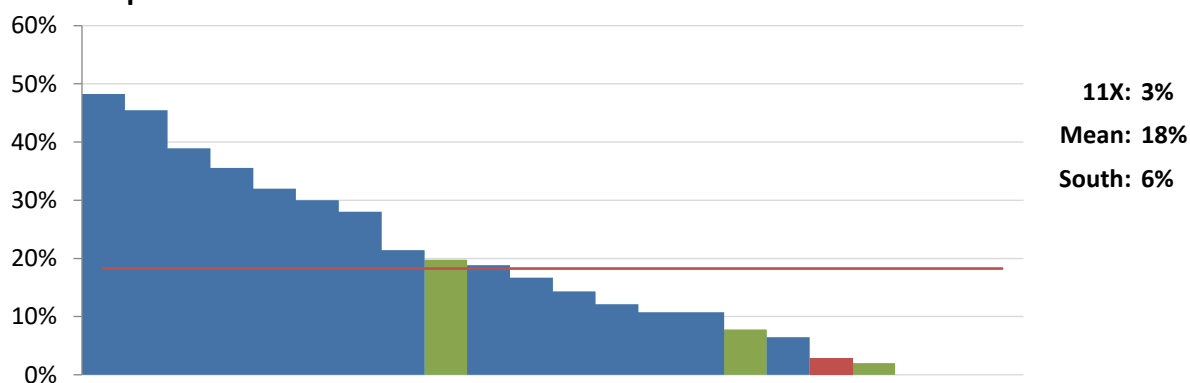
The charts below provide comparisons on GP premises.

The Premises payments data was obtained from NHS payments to GP practices, and the average is £1,415,885 per 100,000 registered population. The 'co-location' and 'the percentage that were purpose built for the function' charts are from the Network survey data.

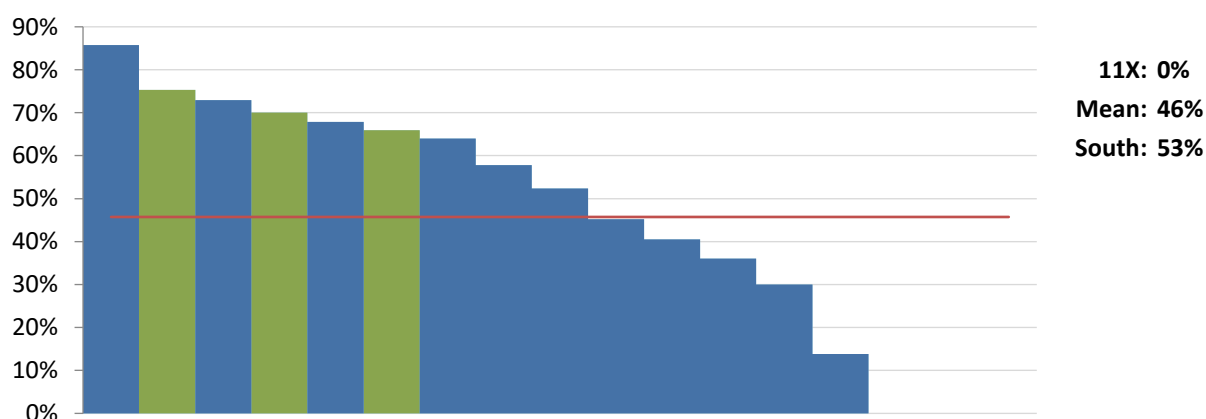
Premises payments per 100,000 registered population



Percentage of GP practices that are co-located with another GP practice



Percentage of GP practices that are in buildings which were purpose build for this function

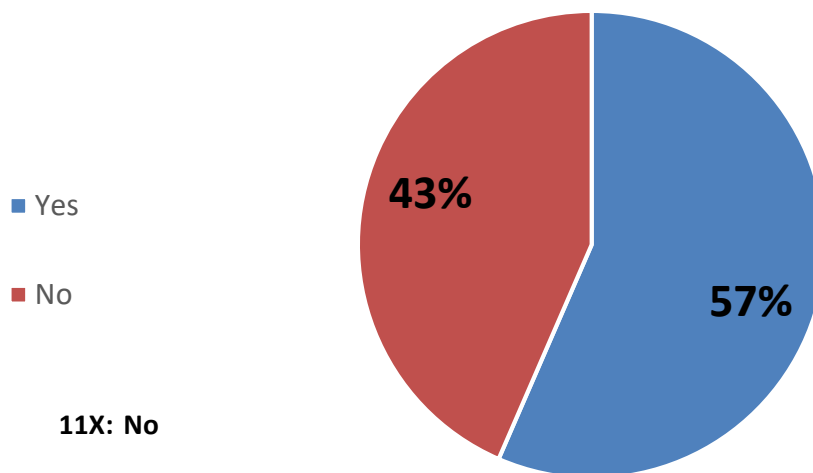




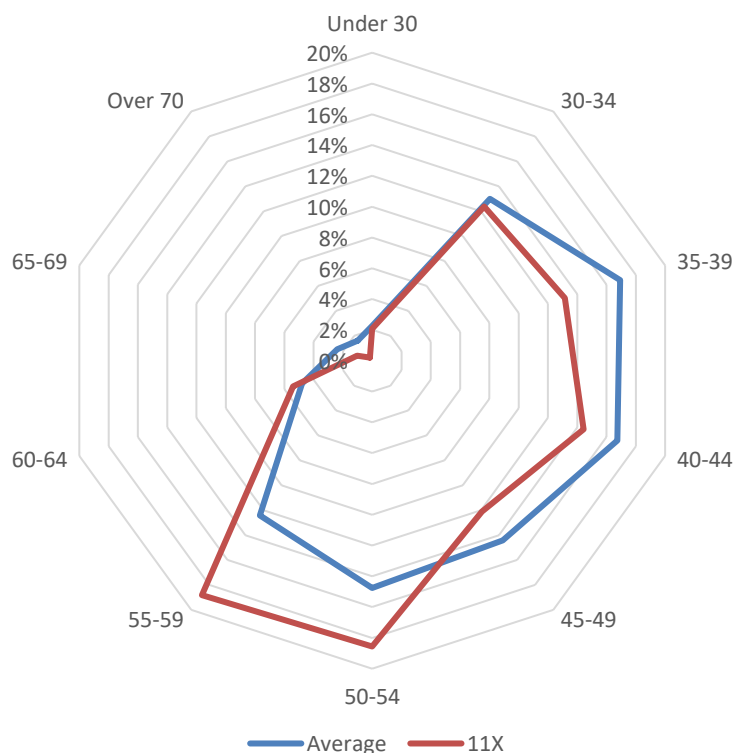
GP Workforce

CCGs are encountering the challenge of an ageing GP workforce, and how to approach this. As shown in the chart below, only 57% of CCGs are collecting the information on the age of the GP workforce.

Does the CCG monitor the age of GPs within the CCG



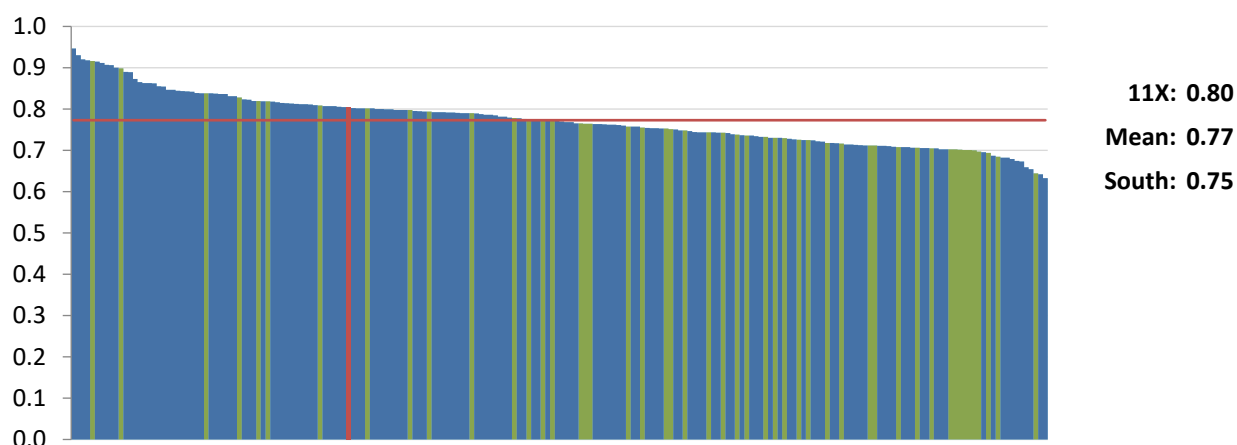
GP headcount workforce in CCG



The chart to the left shows the age profile by percentage of the GP headcount workforce. This chart highlights the need for close monitoring of the GP workforce, to plan for the retirement of GPs, and a reduction in the workforce size.

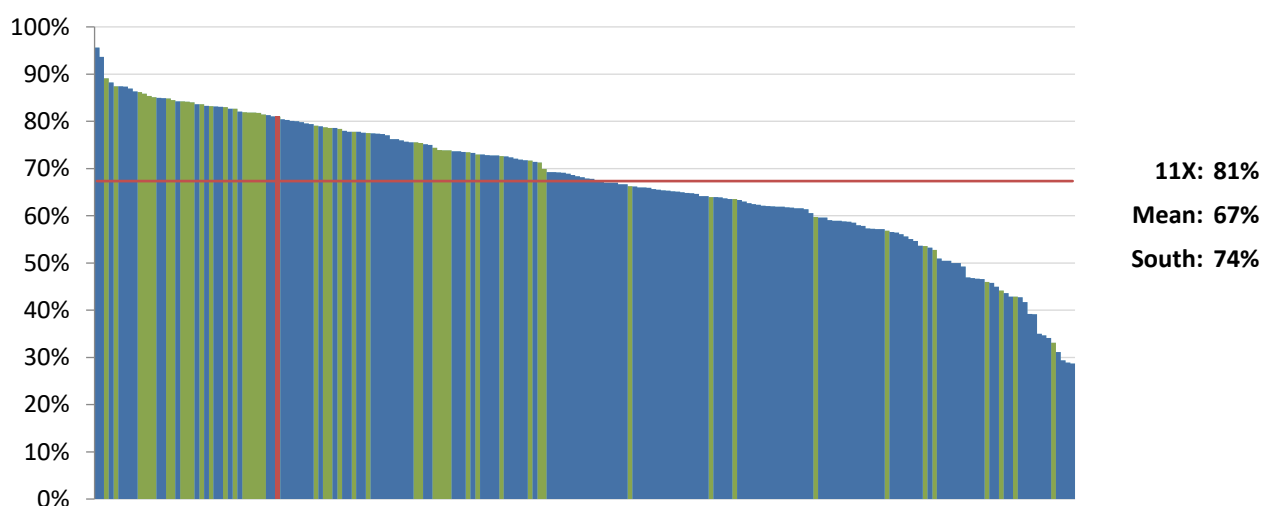


Average number of GP WTE per GP headcount



The chart above shows the average WTE value per GP working in each CCG area, and indicates the level of part time working. The mean value is 0.77 which indicates that on average each GP works the equivalent of just under 4 full working days per week, and the range varies from 0.63 to 0.95.

Percentage of General Practitioners whose Country of Primary Medical Qualification is the UK



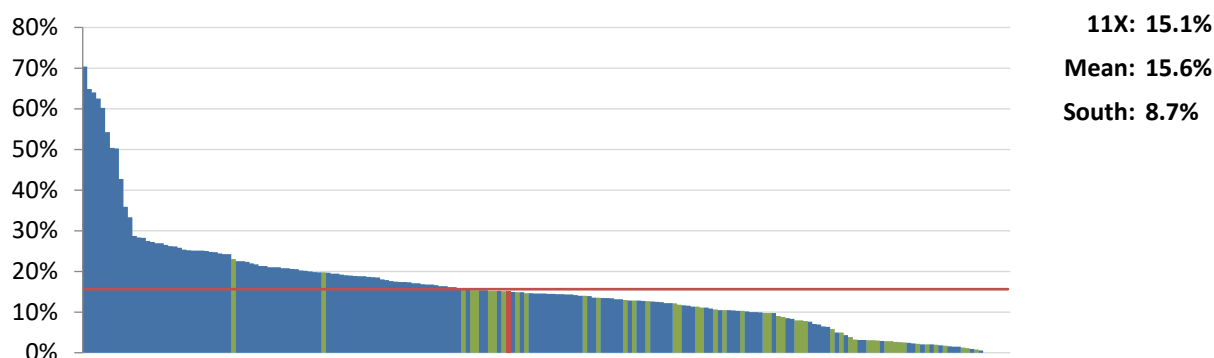
The chart above shows the percentage of general practitioners whose Country of Primary Medical qualification is the UK, and the average is 67%.



Seniority

The profile for the number of GPs classified as senior partners varies greatly between CCGs. It would be interesting to investigate whether this is due to coding differences, or differences in the nature of primary care provision in the areas.

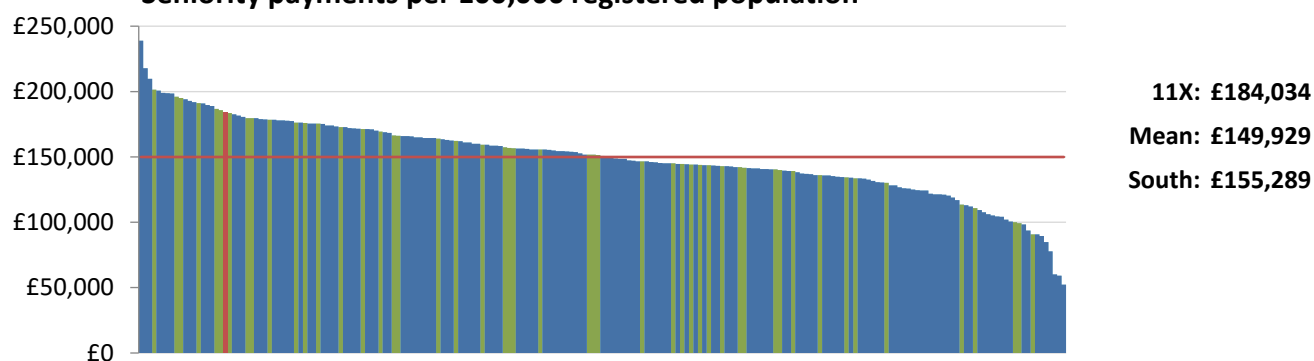
GP senior partners WTE as a percentage of total GP WTE



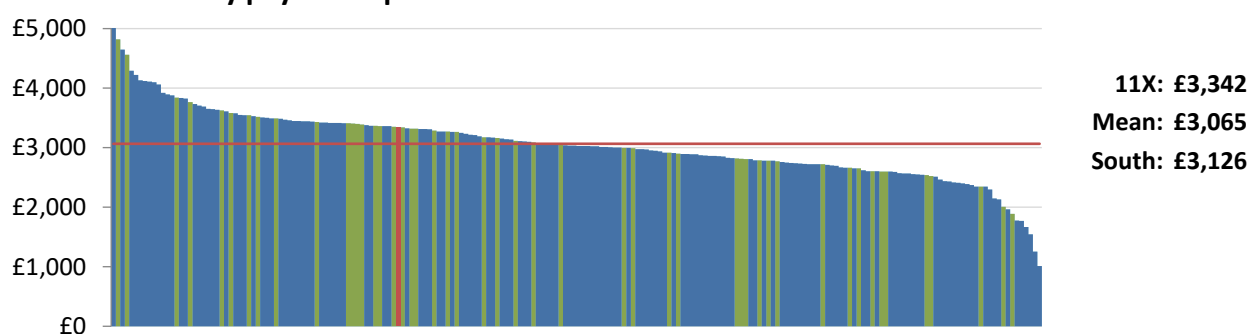
Seniority factor payments were introduced as part of the new General Medical Services (GMS) contract in 2004. Payments are part of an individual GP's pay, although they are paid to the practice.

The payment that a GP receives is based on a scale and is dependent on the number of years of experience. It has been agreed that seniority payments will cease altogether on 31 March 2020, with the total amount reinvested into global sum. To minimise impact on the profession, the payments are being phased out.

Seniority payments per 100,000 registered population



Seniority payments per total GP WTE

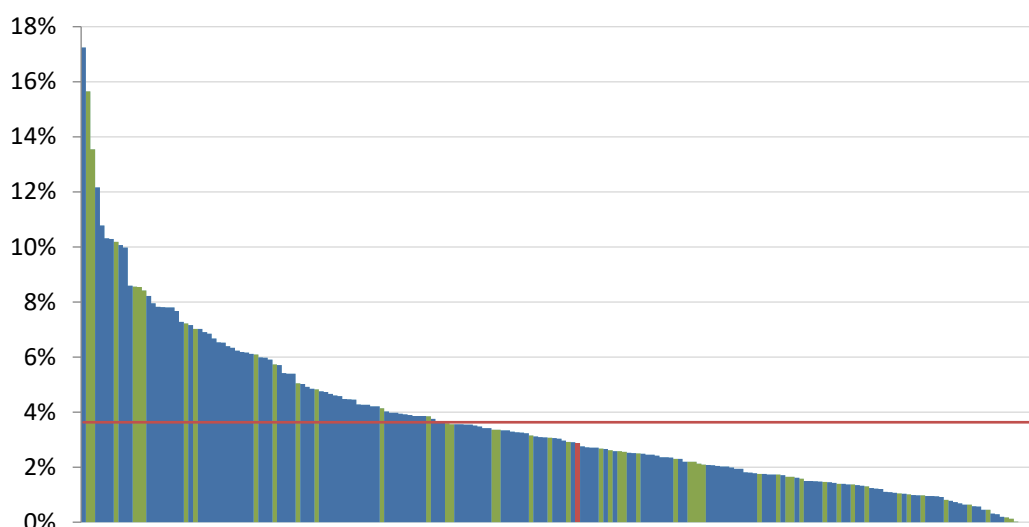




Locums

Locums are used when there is a shortage in the GP workforce. The charts below are from the GP workforce dataset. On average, 3.6% of the GP workforce is comprised of locums, and the total locum allowance per 100,000 registered population is £49,612.

Total GP Locums as a percentage of total GP WTE

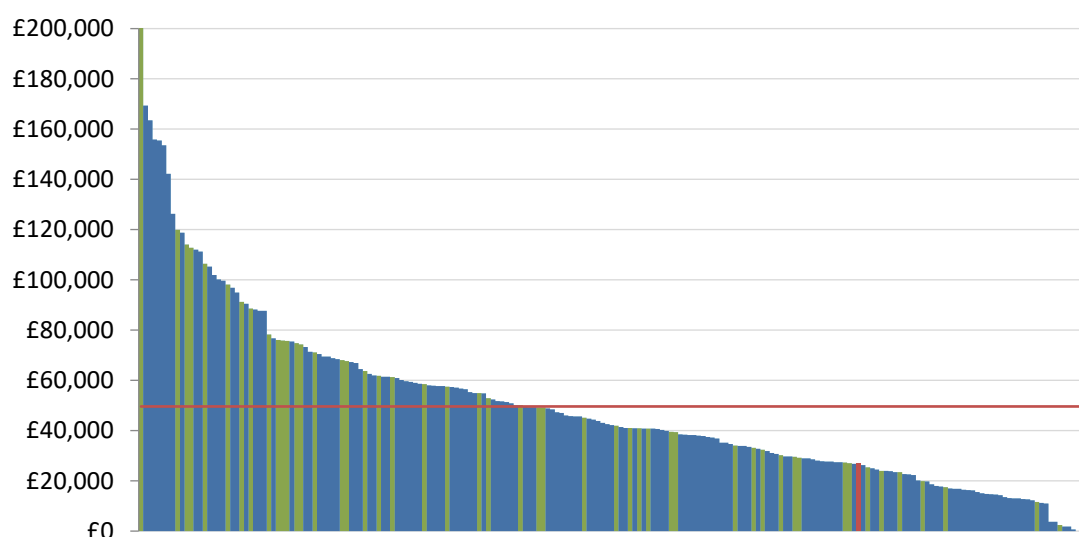


11X: 2.9%

Mean: 3.6%

South: 3.6%

Total locum allowance per 100,00 registered population



11X: £26,809

Mean: £49,612

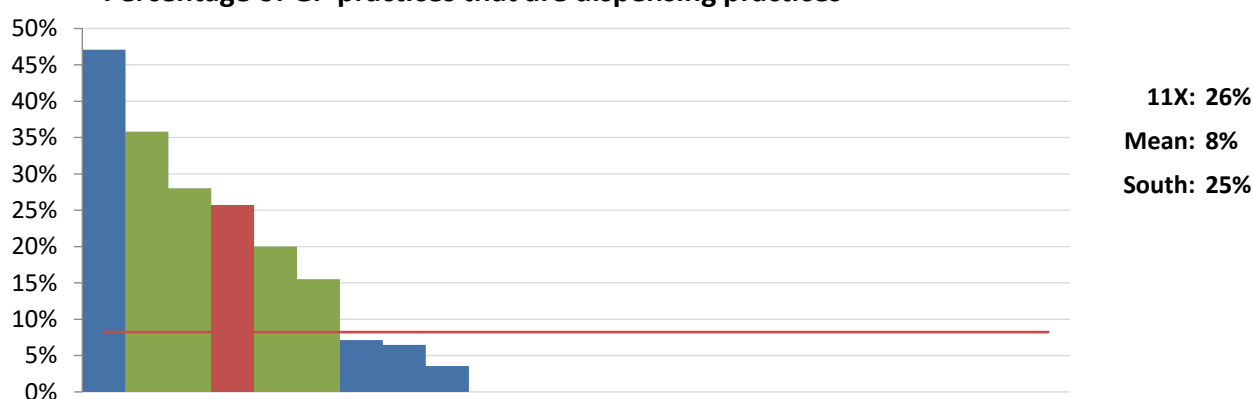
South: £57,747



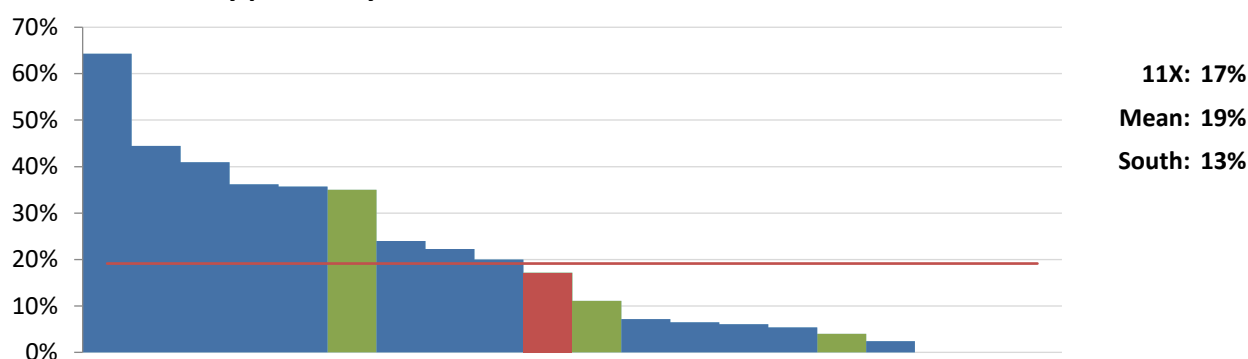
Pharmacy services

Appropriate supply of medicines, and access to specialist knowledge, is vital to the successful functioning of primary care services. From the Network supplementary data collection, on average 15% of GP practices are dispensing practices, and 19% are co-located with a community pharmacy. The number of clinical pharmacists that work in GP practices per 100,000 registered population ranges from 0 to 13, and the mean is 3.

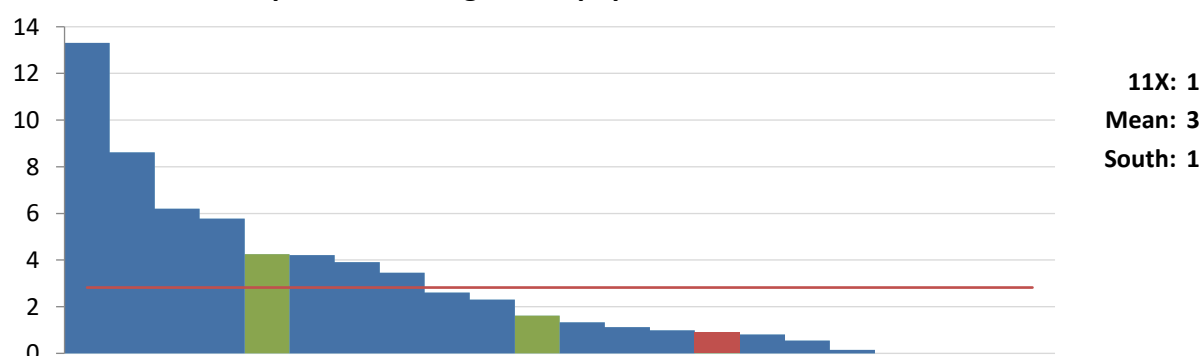
Percentage of GP practices that are dispensing practices



Percentage of GP practices that are co-located with a community pharmacy



Number of clinical pharmacists who work in GP practices within the CCG per 100,000 registered population

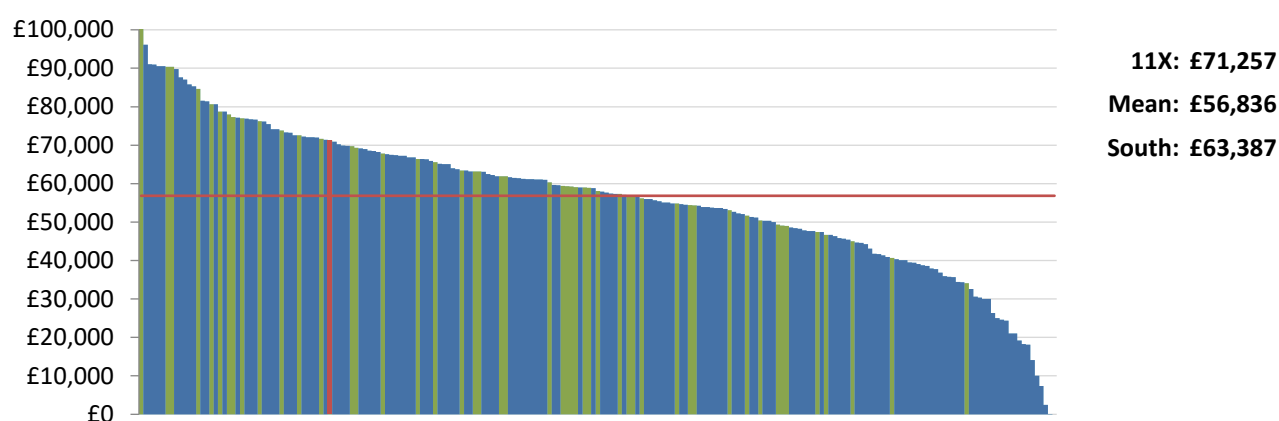




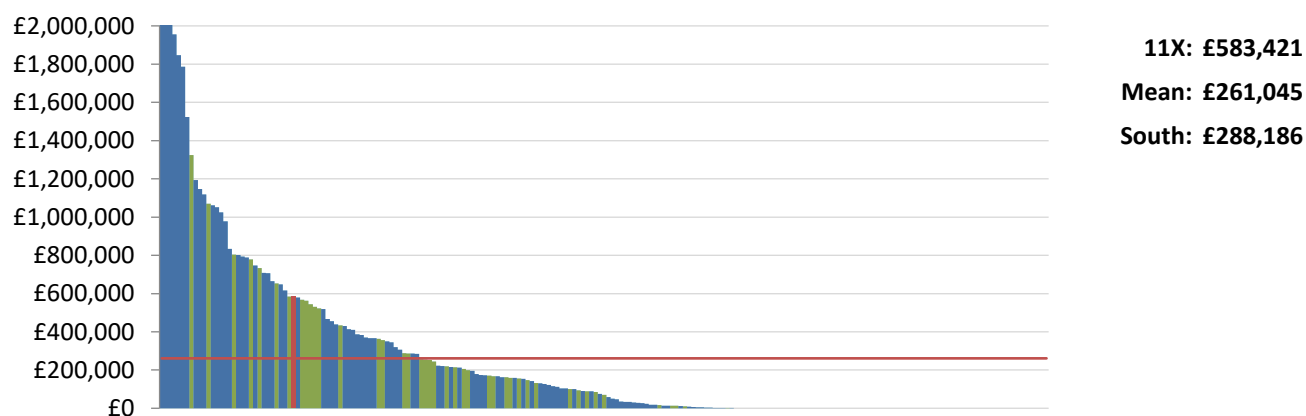
Benchmarking Network

The charts below show the medicines elements from the NHS payments to GP practices.

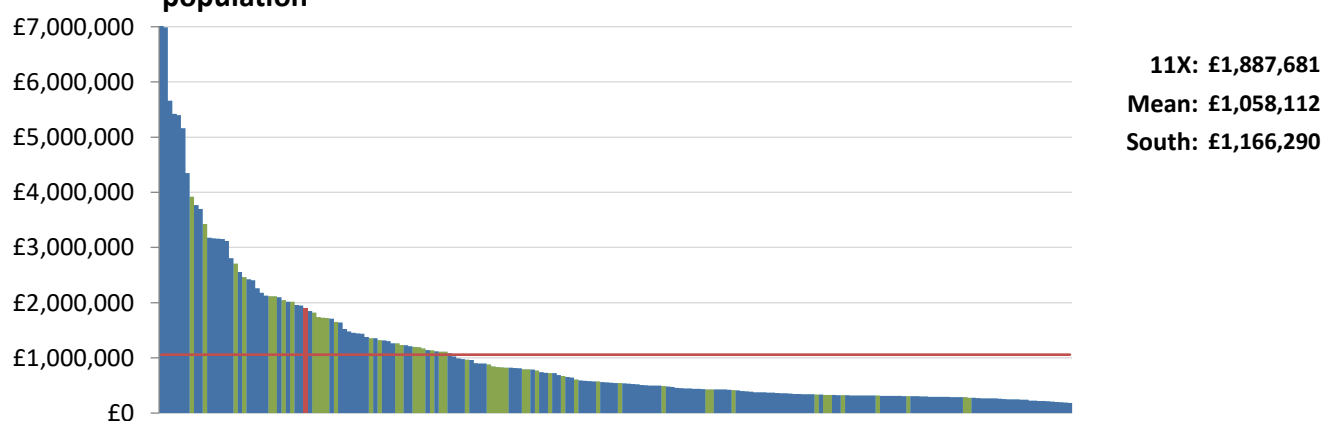
Prescribing Fee Payments per 100,000 registered population



Dispensing Fee Payments per 100,000 registered population



Reimbursement Of Drugs payments per 100,000 registered population





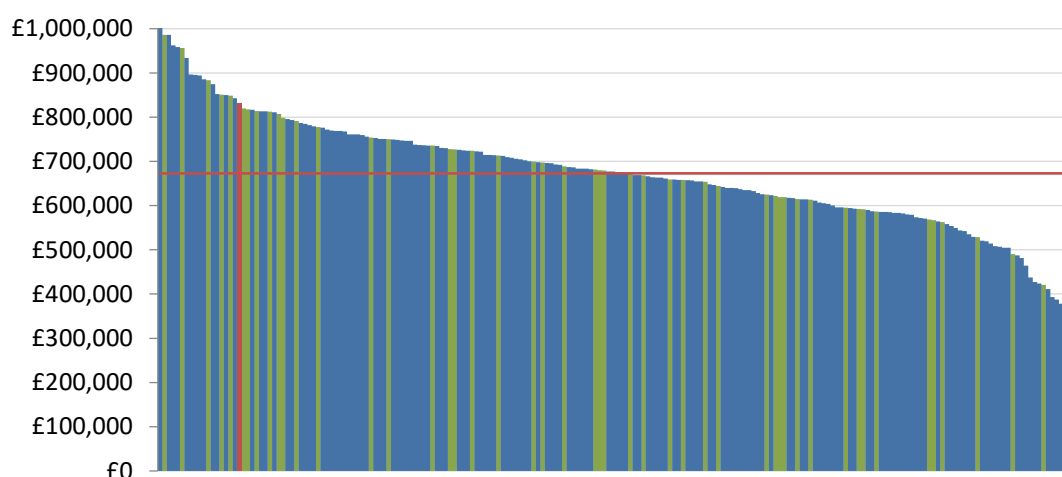
Enhanced Services

Enhanced services (ES) require an enhanced level of provision above what is required under core GMS contracts. Guidance on ES is provided in the Directions and NHS England service specifications.

(A) Directed Enhanced Services

Directed Enhanced Services (DES) are nationally defined additional services that practices provide, beyond the essential services that are offered. The charts below and on the next page detail the seven main DES, and the related payments to the practices in the CCG.

Total Directed Enhanced Services payments per 100,000 registered population



Percentage of GP practices in CCG taking part in DES

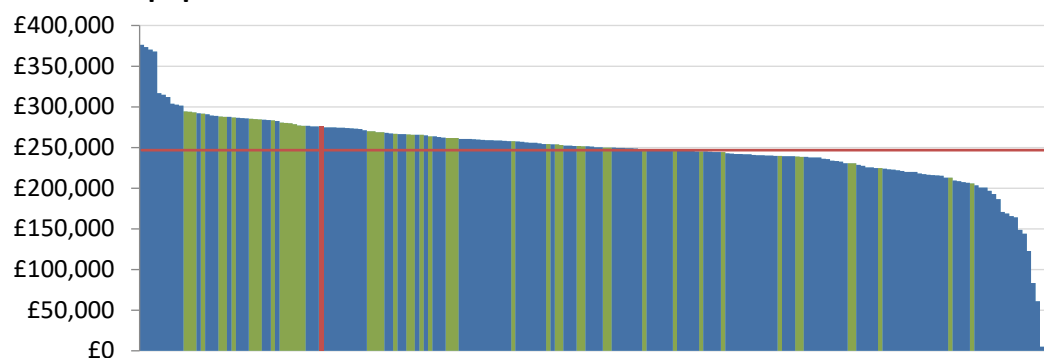
DES	Average	11X
Avoiding Unplanned Admissions	91%	...
Childhood Immunisation	30%	...
Extended hours Access	79%	...
Influenza and Pneumococcal Immunisation	35%	...
Learning Disabilities Health Check	91%	...
Minor Surgery	75%	...
Violent Patients	20%	...

The table above shows the percentage of GP practices in the CCG that take part in DES. This data was collected as part of the questionnaire that was sent out to all member CCGs. The most common DES in CCGs is Learning Disabilities Health Check and Avoiding Unplanned Admissions, both with an average of 91% of GP practices participating. The DES for Violent Patients is the least common, with on average only 20% of GP practices within CCGs taking part.



Benchmarking Network

Unplanned Admissions payments per 100,000 registered population

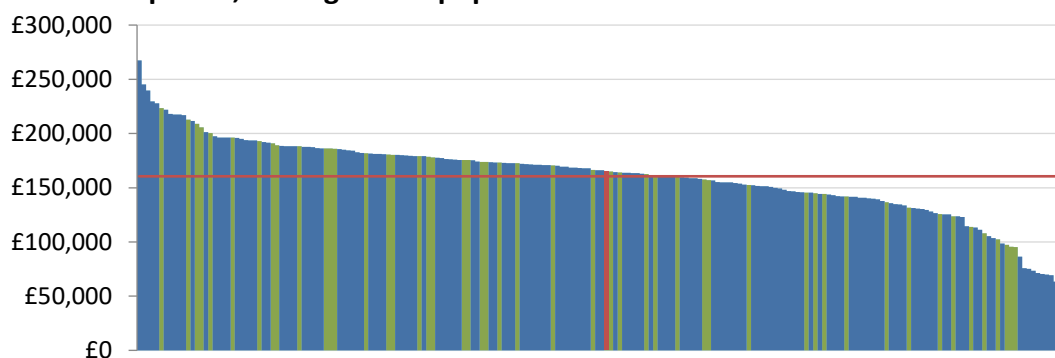


11X: £275,529

Mean: £246,694

South: £262,752

Childhood Vaccination And Immunisation Scheme payments per 10,000 registered population

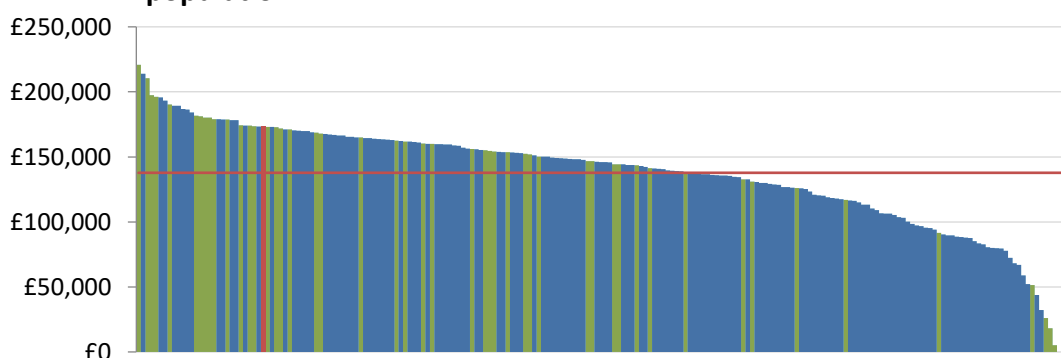


11X: £165,021

Mean: £160,533

South: £163,510

Extended Hours Access payments per 100,000 registered population

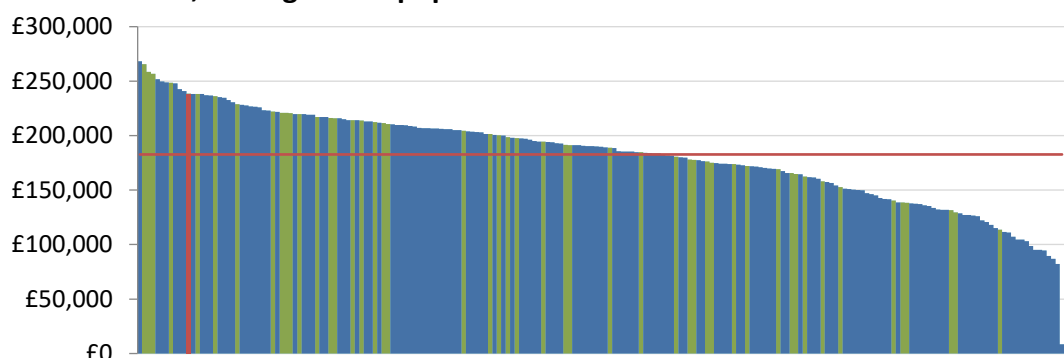


11X: £173,343

Mean: £137,766

South: £151,116

Influenza and Pneumococcal Immunisations payments per 100,000 registered population



11X: £238,619

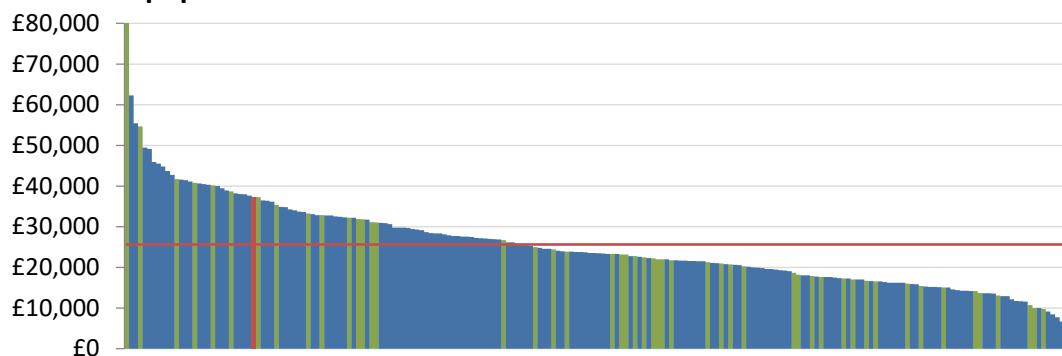
Mean: £182,727

South: £194,769



Benchmarking Network

Learning Disabilities payments per 100,000 registered population

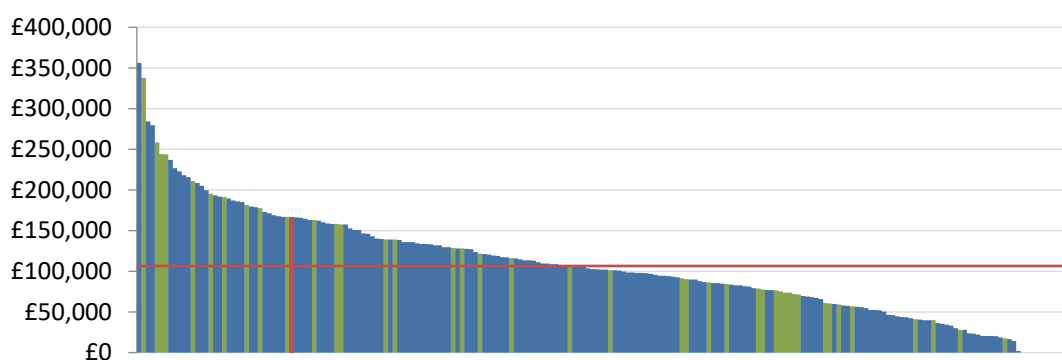


11X: £37,307

Mean: £25,628

South: £26,795

Minor Surgery payments per 100,000 registered population

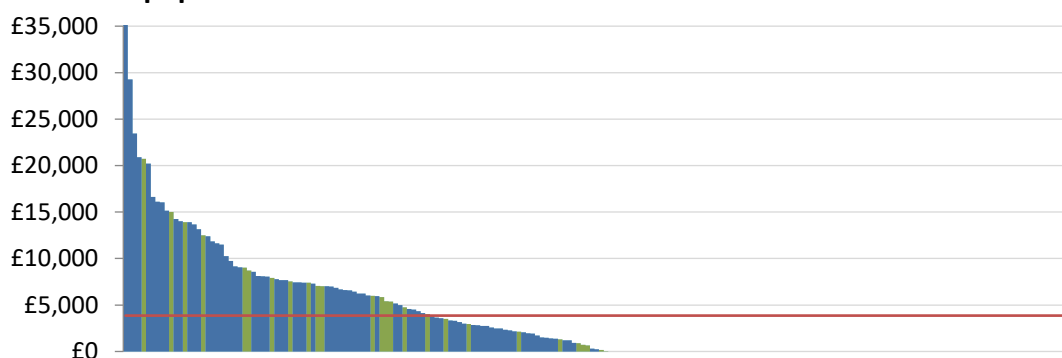


11X: £166,494

Mean: £106,479

South: £102,859

Services For Violent Patients payments per 100,000 registered population



11X: -£910

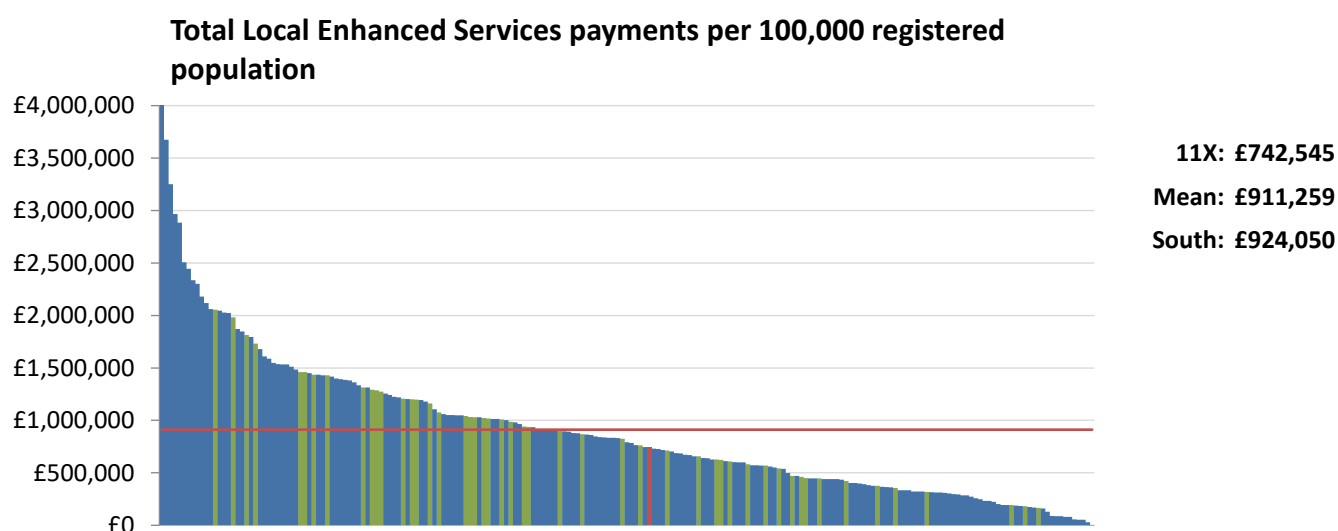
Mean: £3,859

South: £3,193

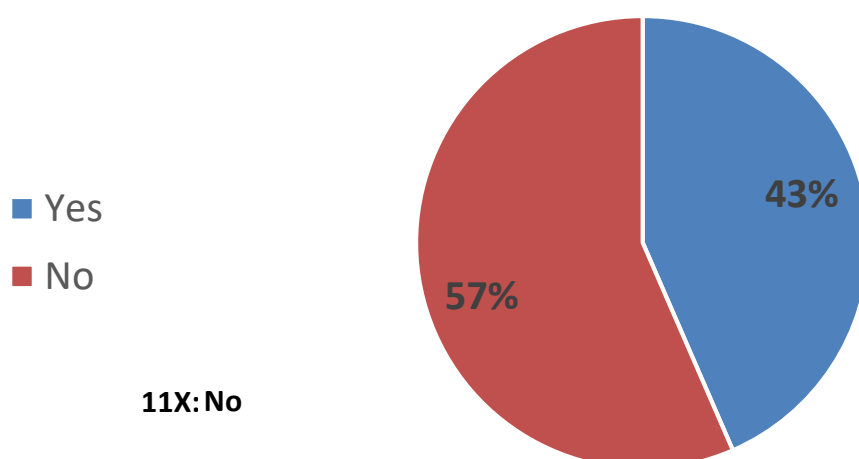


(B) Local Enhanced Services

Local Enhanced Services (LES) are commissioned by PCOs and are locally negotiated without national pay rates. They are intended to be services provided in response to specific local needs or innovations that are being piloted. Examples of LES are care for the homeless, and palliative care. The total LES payments per 100,000 registered population has an average value of £911,259. In addition, in 43% of CCGs, there are cases where a single payment to a GP practice covers multiple "LES" services.



Are there any cases where a single payment to a GP practice covers multiple "LES" services?

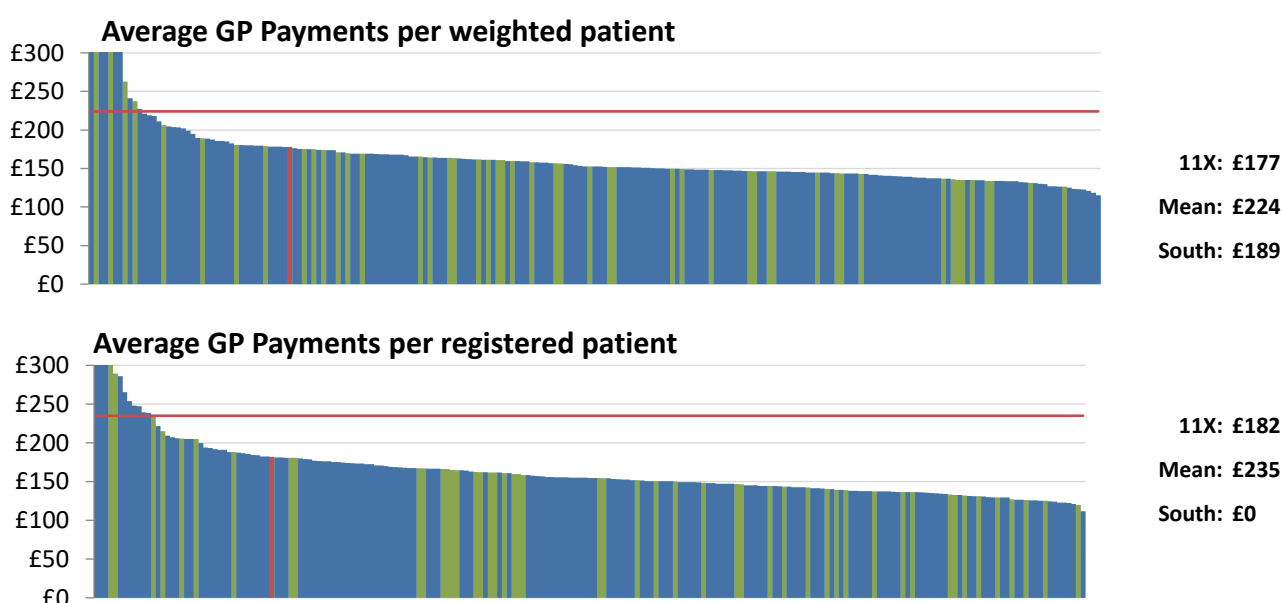




Finance

The finance data in this report has been sourced from the publicly available NHS Payments to General Practice, from NHS Digital. The chart below, is the Average GP payments per weighted patient, and provides an overview metric as to how much CCGs are receiving. The mean is £224 per weighted patient.

The charts on the next page provide a breakdown of the total NHS payments to General Practice per CCG. The payments have been split into four cohorts, and a description of what is included in each of the cohorts is detailed on the page.



On the next page, please find the breakdown of the NHS payments to GP practices, sourced from the publicly available data, referenced in the appendix.

Global Sum and MPIG: Global Sum Payments are a contribution towards the contractor's costs in delivering essential and additional services, including its staff costs. Global Sum is the main payment to practices and is based upon each practice's weighted patient count. The Minimum Practice Income Guarantee (MPIG) is used to top up practices' core funding - their Global Sum payments - to match their basic income levels, before the new GMS contract was introduced.

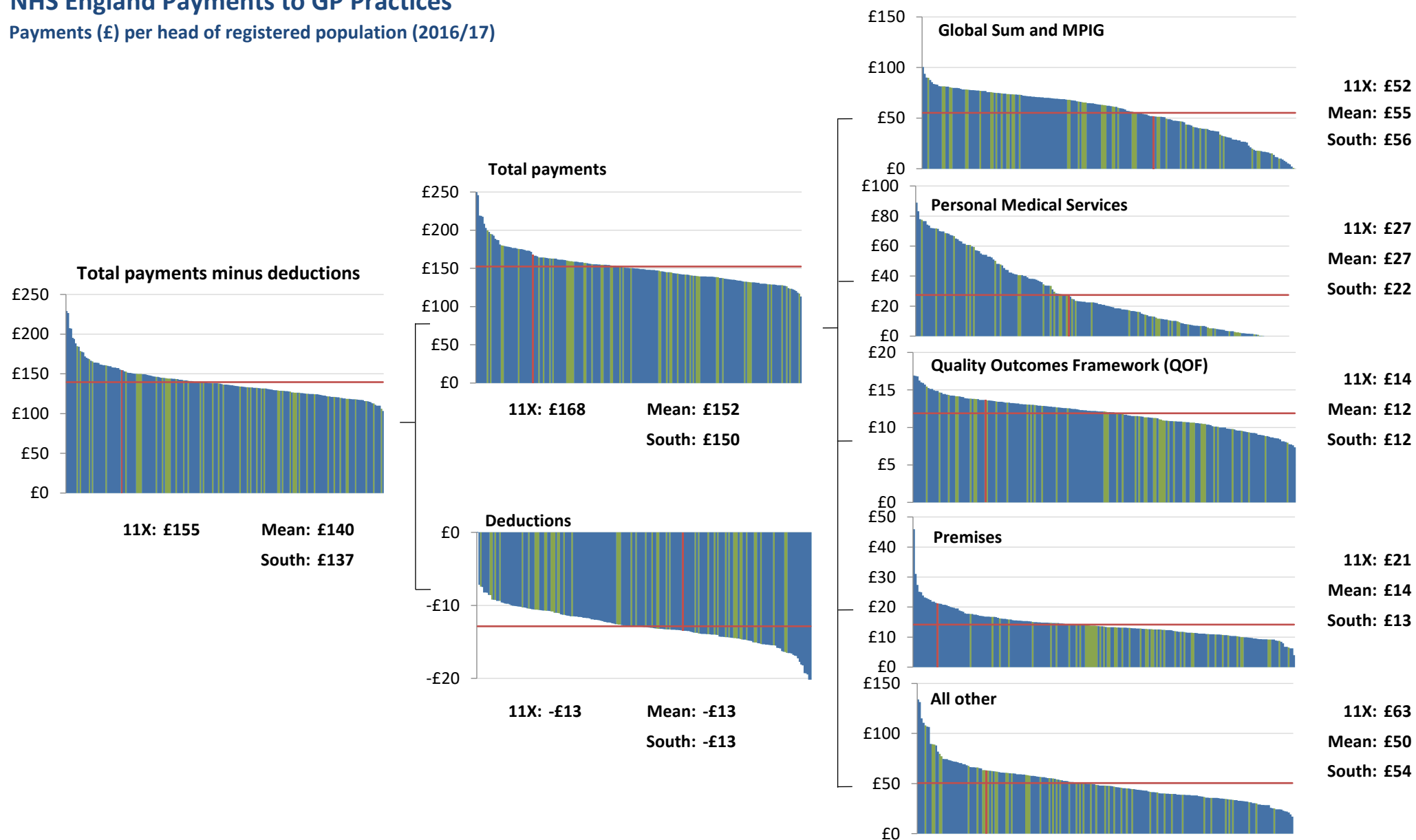
Personal Medical Services: Contracts are locally negotiated but are similar to Global Sum and MPIG in GMS.

Quality Outcomes Framework (QOF): Total QOF Payments is comprised of Quality Aspiration Payments and Quality Achievement Payments.

Premises: GP Practices receive payments to cover certain premises costs.

NHS England Payments to GP Practices

Payments (£) per head of registered population (2016/17)

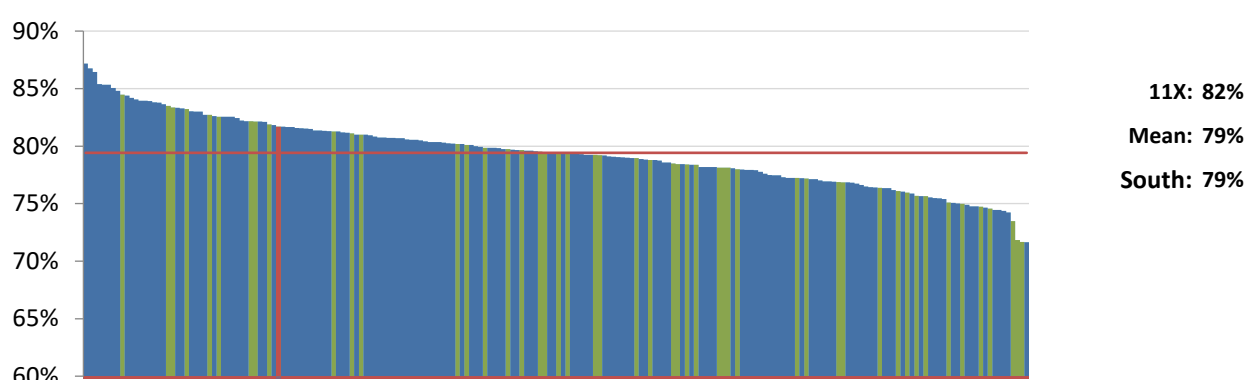




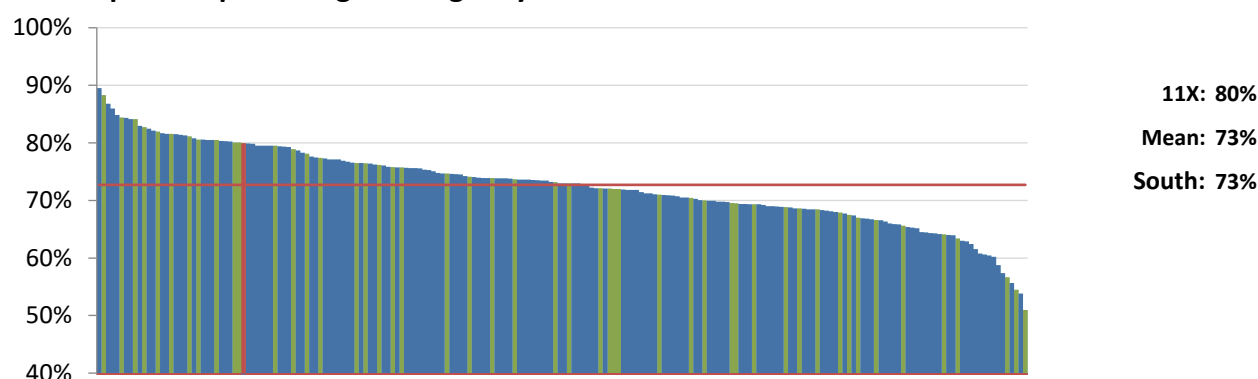
Patient experience

The data in this section has been sourced from the GP Patient Survey. The GP Patient Survey shows how people feel about their GP practice. On average, 79% of respondents to the survey are satisfied with the GP practice opening hours, and 73% of respondents state that it is easy to get through to someone at the GP practice on the phone.

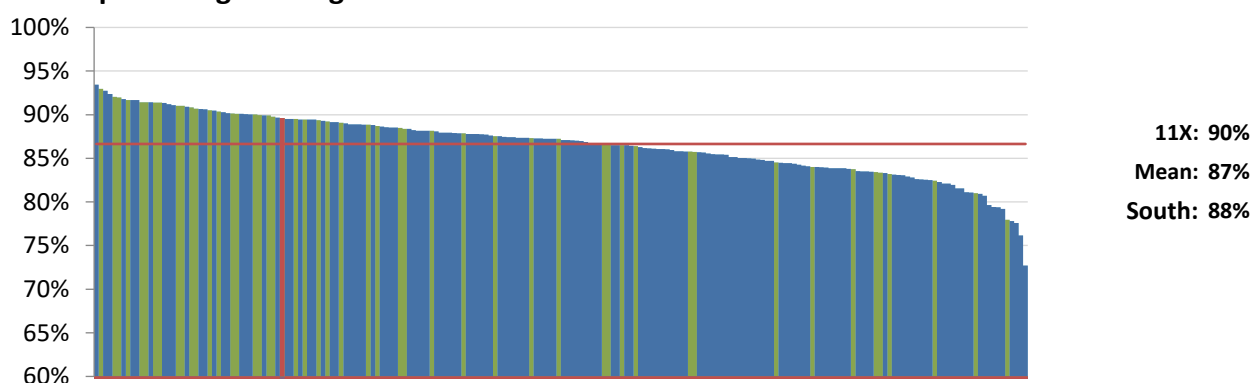
Satisfaction with opening hours - percentage stating satisfied



Ease of getting through to someone at GP surgery on the phone - percentage stating Easy



Able to get an appointment or to see or speak to someone - percentage stating Yes

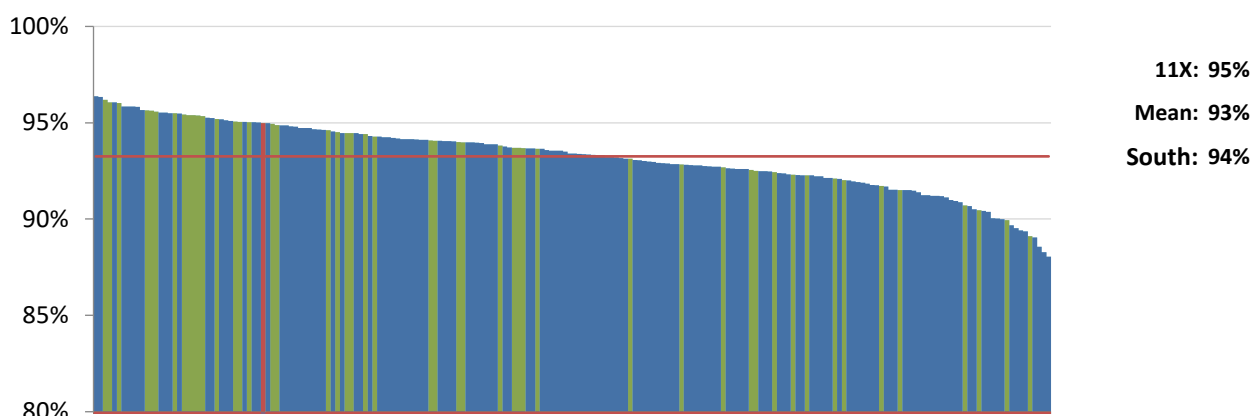




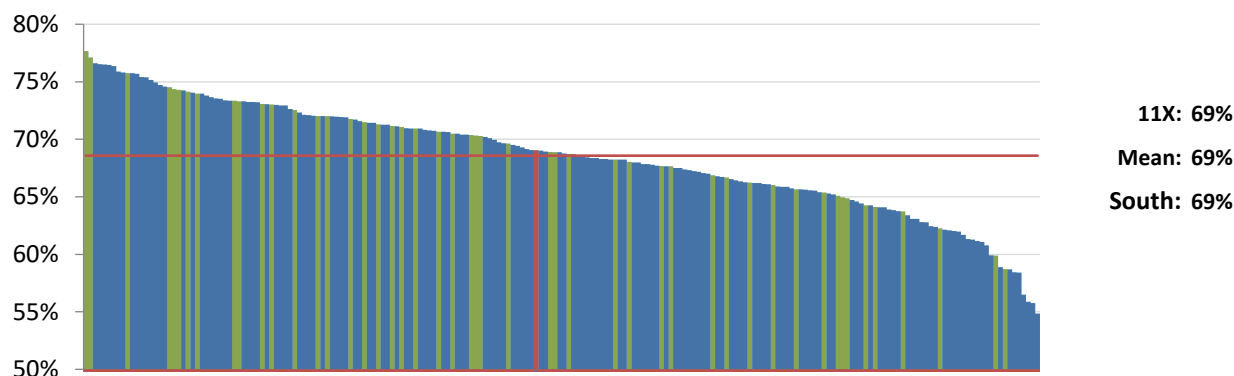
Benchmarking Network

From the GP Patient Survey, on average 93% of respondents have confidence and trust in their GP. 80% of respondents would recommend the GP surgery to someone who has just moved to the local area.

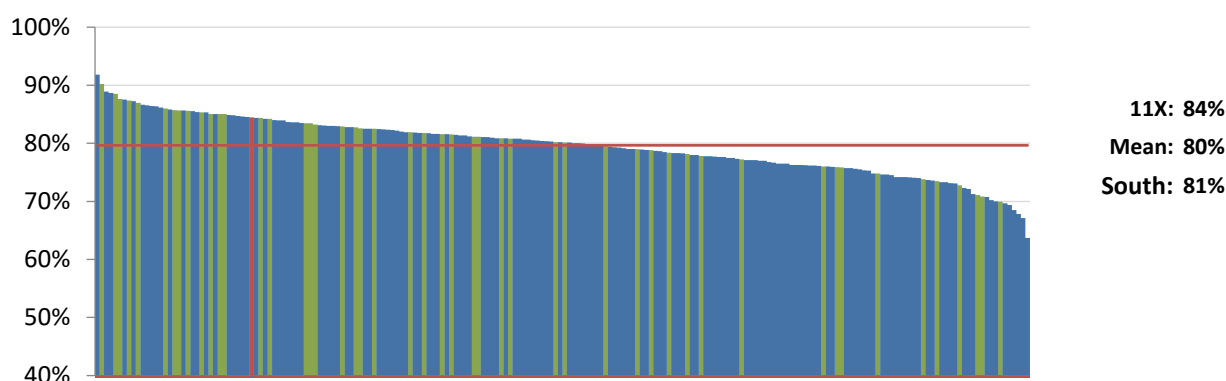
Confidence and trust in GP - percentage stating yes



Overall experience of out-of-hours GP services - percentage stating good



Recommending GP surgery to someone who has just moved to the local area - % stating yes

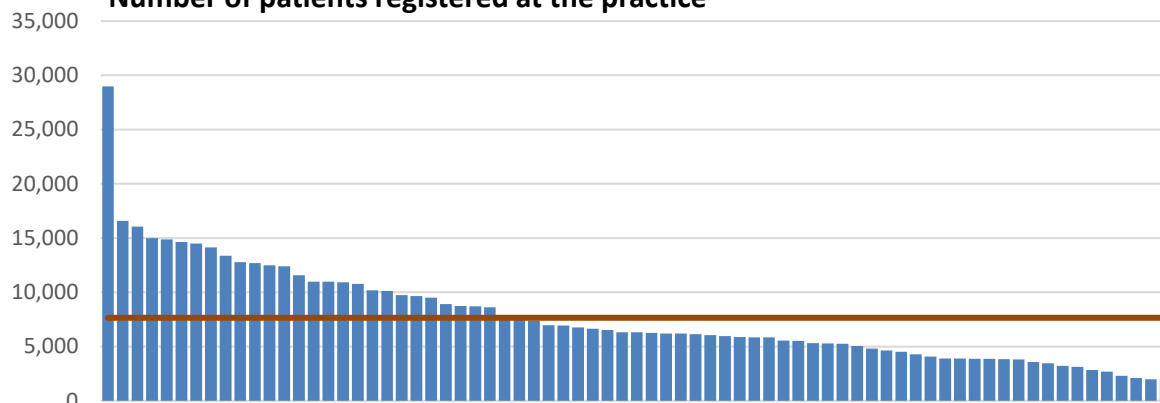




Example GP Practice level comparisons

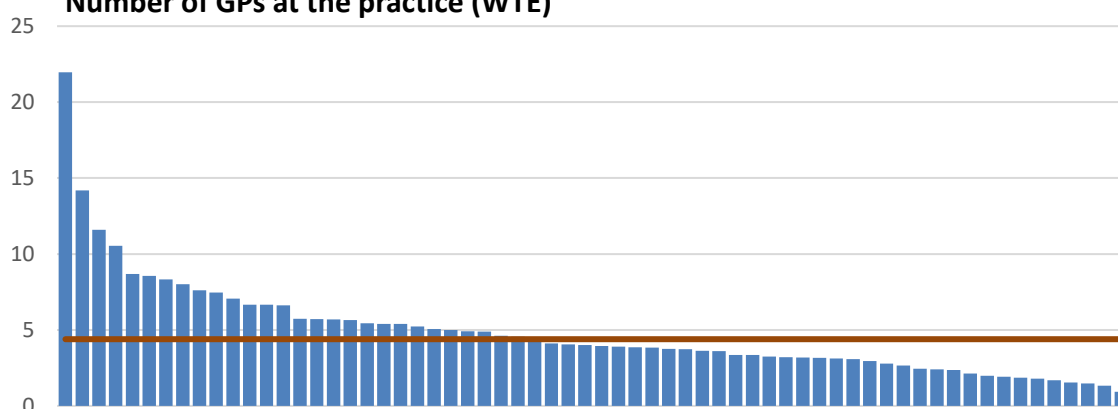
Charts show all GP practices within your CCG.

Number of patients registered at the practice



	Rank	Practice	Practice name	Value	CCG Average:
Top 5	1	L85008	FROME MEDICAL CENTRE	28,972	7,652
	2	L85016	BURNHAM MEDICAL CENTRE	16,586	
	3	L85001	FRENCH WEIR HEALTH CENTRE. TAUNTON	16,041	
	4	L85012	WELLINGTON MEDICAL CENTRE	14,994	
	5	L85035	EAST QUAY MEDICAL CENTRE	14,863	
Lowest 5	69	L85601	BRENT AREA MEDICAL CENTRE	2,699	
	70	L85624	CHURCH VIEW MEDICAL CENTRE	2,318	
	71	L85620	WEST ONE SURGERY	2,102	
	72	L85045	WESTLAKE SURGERY	1,991	
	73	L85608	PORLOCK MEDICAL CENTRE	1,984	

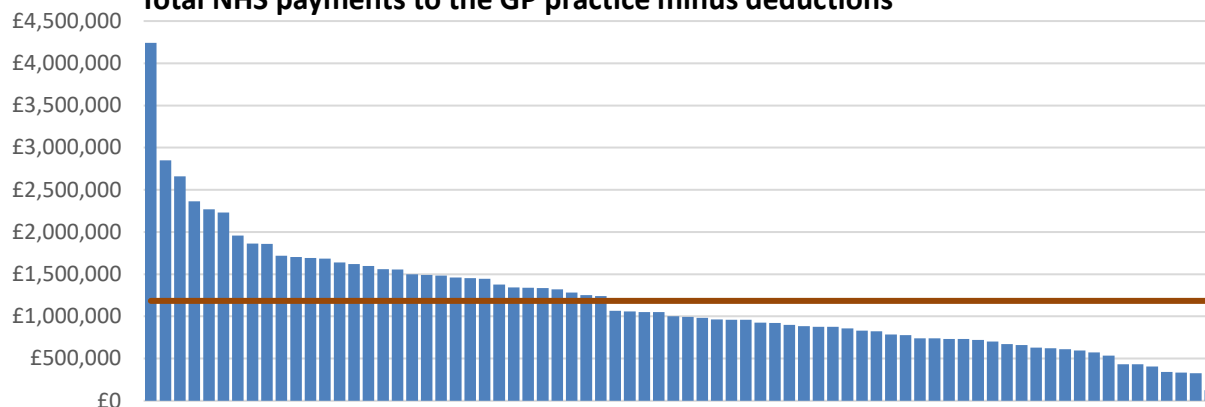
Number of GPs at the practice (WTE)



	Rank	Practice	Practice name	Value	CCG Average:
Top 5	1	L85008	FROME MEDICAL CENTRE	22.0	4.4
	2	L85012	WELLINGTON MEDICAL CENTRE	14.2	
	3	L85002	WELLS HEALTH CENTRE	11.6	
	4	L85035	EAST QUAY MEDICAL CENTRE	10.5	
	5	L85042	TAUNTON ROAD MEDICAL CENTRE. BRIDGWATER	8.7	
Lowest 5	60	L85064	OAKLANDS SURGERY	1.7	
	61	L85061	THE MEADOWS SURGERY	1.5	
	62	L85060	VINE SURGERY	1.5	
	63	L85066	THE ILCHESTER SURGERY	1.3	
	64	Y01163	WEST COKER SURGERY	0.9	



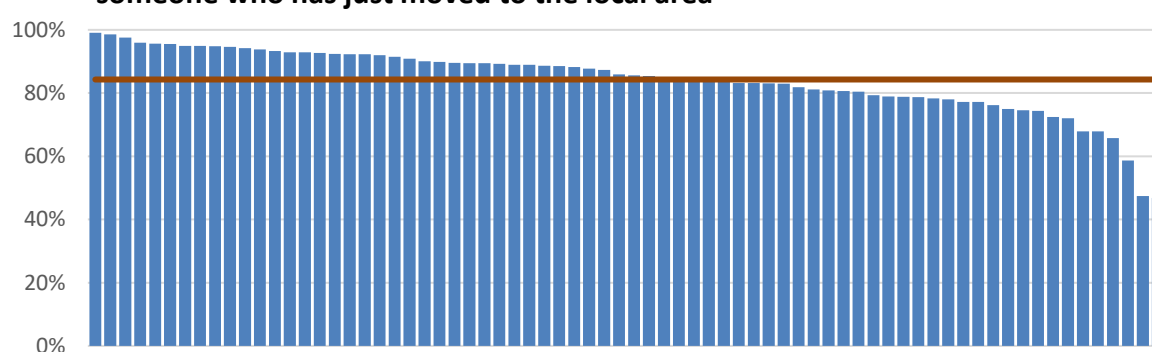
Total NHS payments to the GP practice minus deductions



	Rank	Practice	Practice name	Value
Top 5	1	L85008	FROME MEDICAL CENTRE	£4,240,518
	2	L85033	LANGPORT SURGERY	£2,849,939
	3	L85024	POLDEN MEDICAL PRACTICE	£2,659,991
	4	L85022	HENDFORD LODGE MEDICAL CENTRE	£2,363,100
	5	L85016	BURNHAM MEDICAL CENTRE	£2,269,905
Lowest 5	70	L85064	OAKLANDS SURGERY	£404,372
	71	L85616	VICTORIA GATE SURGERY	£340,426
	72	L85620	WEST ONE SURGERY	£333,625
	73	L85045	WESTLAKE SURGERY	£325,218
	74	L85029	L85029 (VINE SURGERY)	£124,395

CCG Average:
£1,183,884

Percentage of patients who would recommend the GP surgery to someone who has just moved to the local area



	Rank	Practice	Practice name	Value
Top 5	1	L85619	TAWSTOCK MEDICAL CENTRE	99%
	2	L85044	QUEEN CAMEL HEALTH CENTRE	99%
	3	L85040	MILLBROOK SURGERY	98%
	4	L85065	THE SURGERY. PARK STREET. DUNSTER	96%
	5	L85611	OAKHILL SURGERY	96%
Lowest 5	68	L85607	SOMERSET BRIDGE SURGERY	68%
	69	L85048	RYALLS PARK MEDICAL CENTRE	66%
	70	L85051	REDGATE MEDICAL CENTRE. BRIDGWATER	59%
	71	L85005	BUTTERCROSS HEALTH CENTRE	47%
	72	L85010	HIGHBRIDGE MEDICAL CENTRE	47%

CCG Average:
84.3%

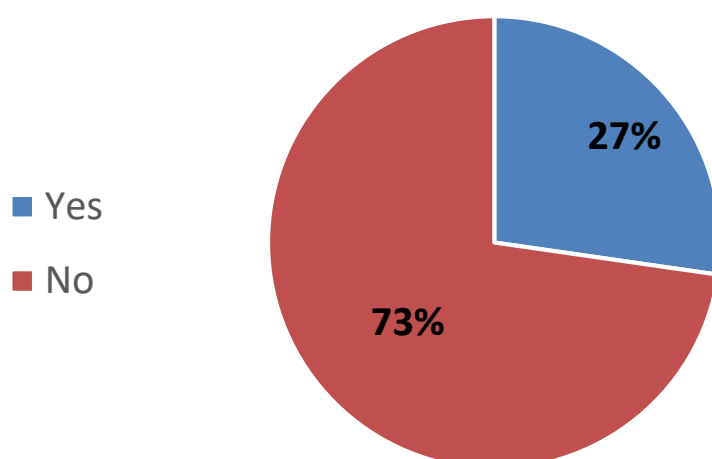


Part B

Work of the CCG Primary Care team

The second part of this report looks at the work of the Primary Care team in the CCG, which includes the split between contractual and transformational work. The data from this section is primarily from a bespoke questionnaire, as there is relatively little publicly available data on this.

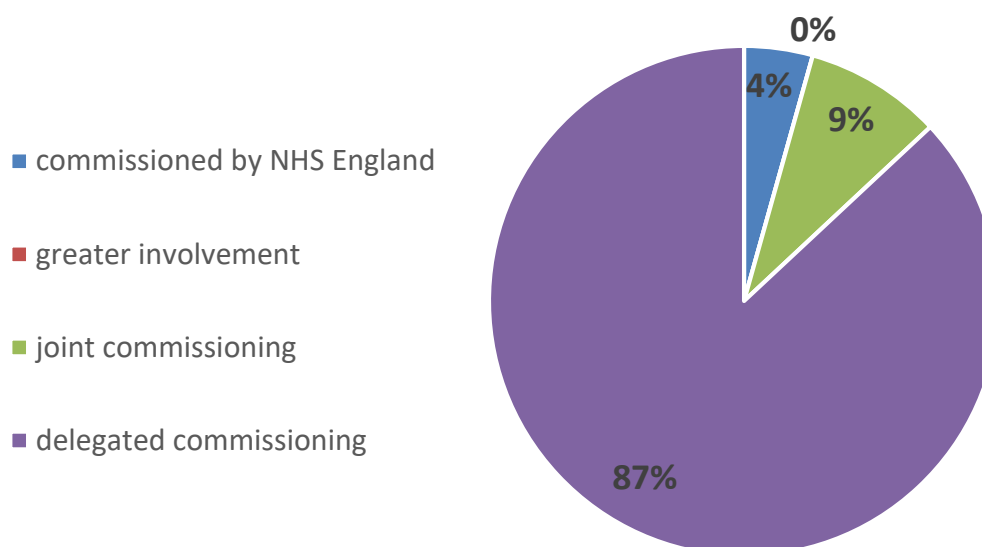
Does the CCG have formal contracting meetings with it's GP practice?





CCG primary care team service model & structure

How are primary care GP services commissioned in your CCG?



11X: joint commissioning

Primary care co-commissioning is one of a series of changes set out in the NHS Five Year Forward View. Co-commissioning is part of a wider strategy to join up care and could lead to a number of benefits for patients and the public.

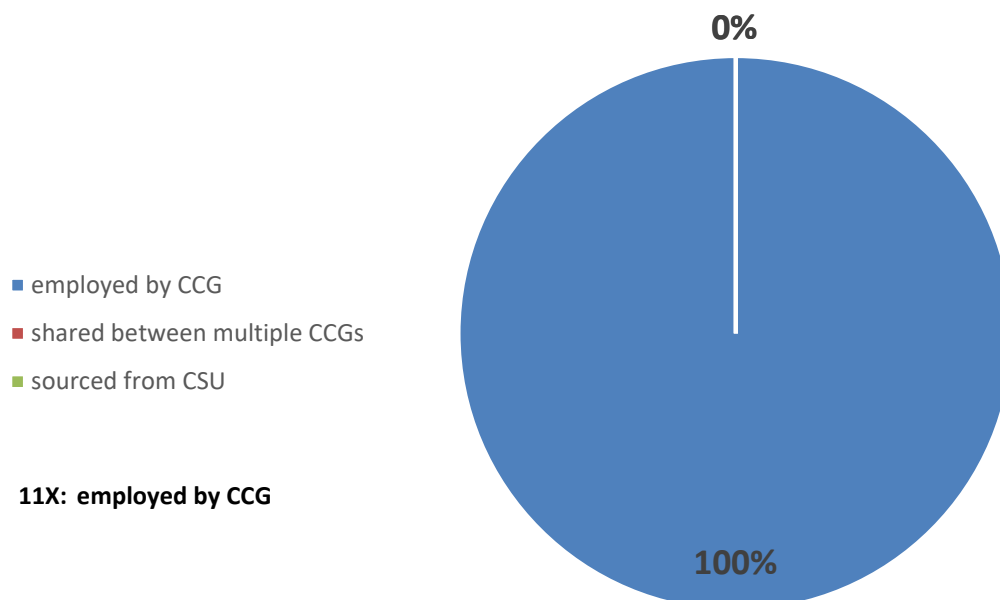
Since 2014/15, NHS England invited CCGs to take on greater responsibility for general practice commissioning through one of three models:

- **Greater involvement** – an invitation to CCGs to work more closely with their local NHS England teams in decisions about primary care services.
- **Joint commissioning** – enables one or more CCGs to jointly commission general practice services with NHS England through a joint committee.
- **Delegated commissioning** – an opportunity for CCGs to take on full responsibility for the commissioning of general practice services.

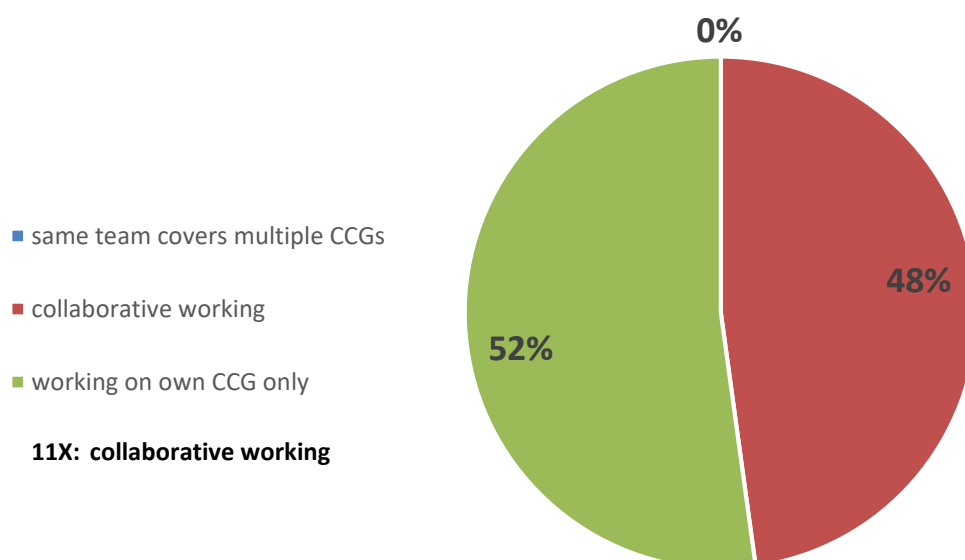
The vast majority of respondents (87%) stated that GP services are commissioned by the delegated commissioning model.



Where does the primary care team sit?



Does the CCG work closely with other CCGs in relation to primary care?



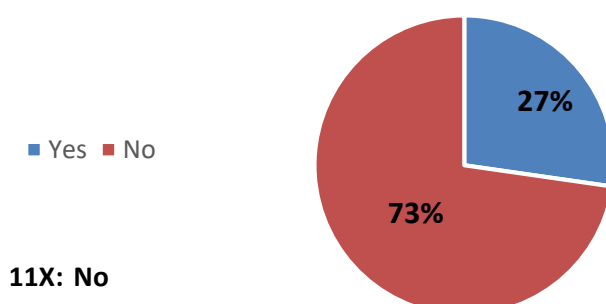
In 100% of cases, the primary care team is directly employed by the CCG.

Whilst 52% of CCGs work with their own CCG only, 48% of CCGs work collaboratively with other CCGs. Nowhere does the one primary care team cover multiple areas. This is more common in urban areas, where the geographical footprint of the CCG is small. This finding is interesting because it is common for CCGs to have combined/share functions.

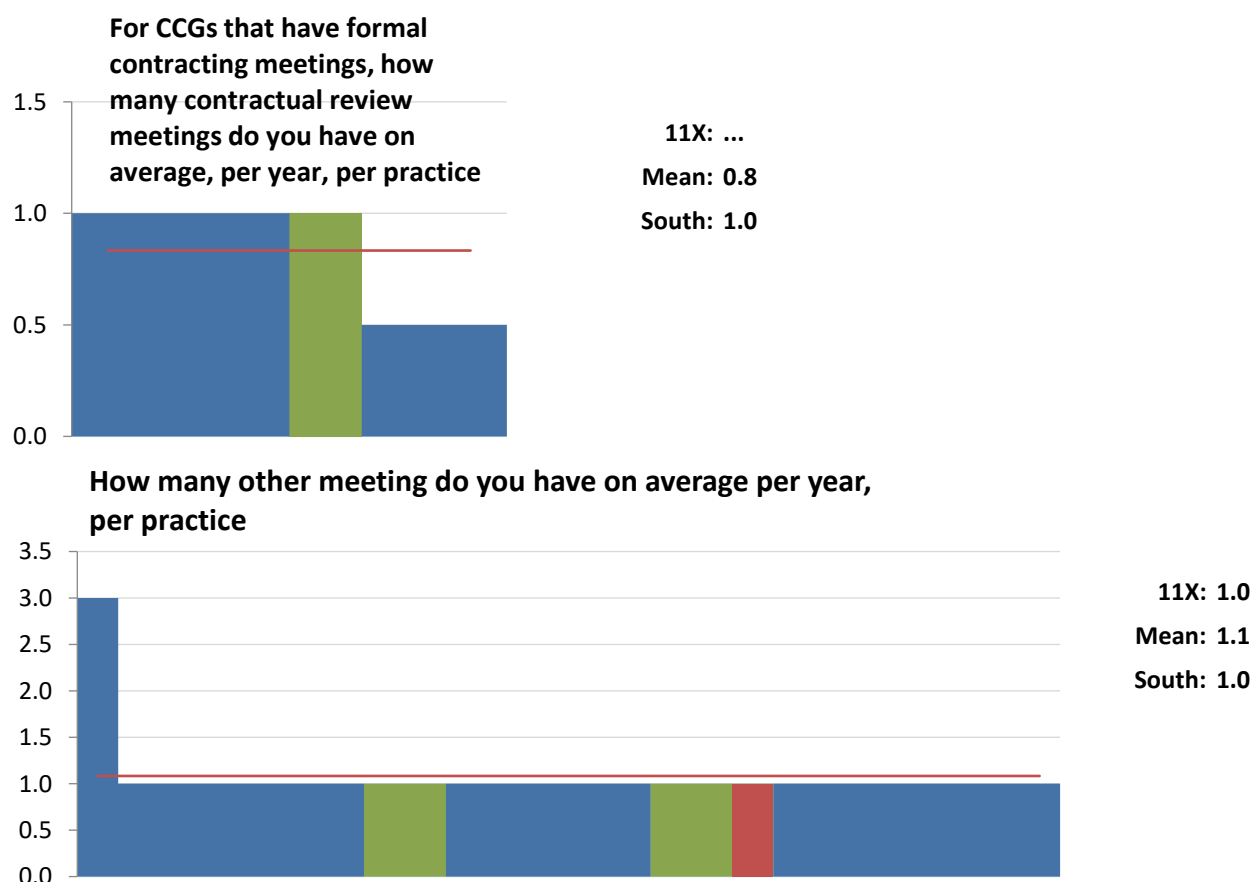


GP practice review meetings

Does the CCG have formal contracting meetings with its GP practices?



Primary care teams within CCGs vary in their approach to reviewing individual GP practices. The questionnaire asked about official review meetings, where various aspects of the GP practice is discussed, to ensure a standard of performance.



The chart at the top of this page depicts the number of contractual review meetings per practice. These can take a certain format, but as shown by the number of responses, many more CCGs have more informal meetings with GP practices.

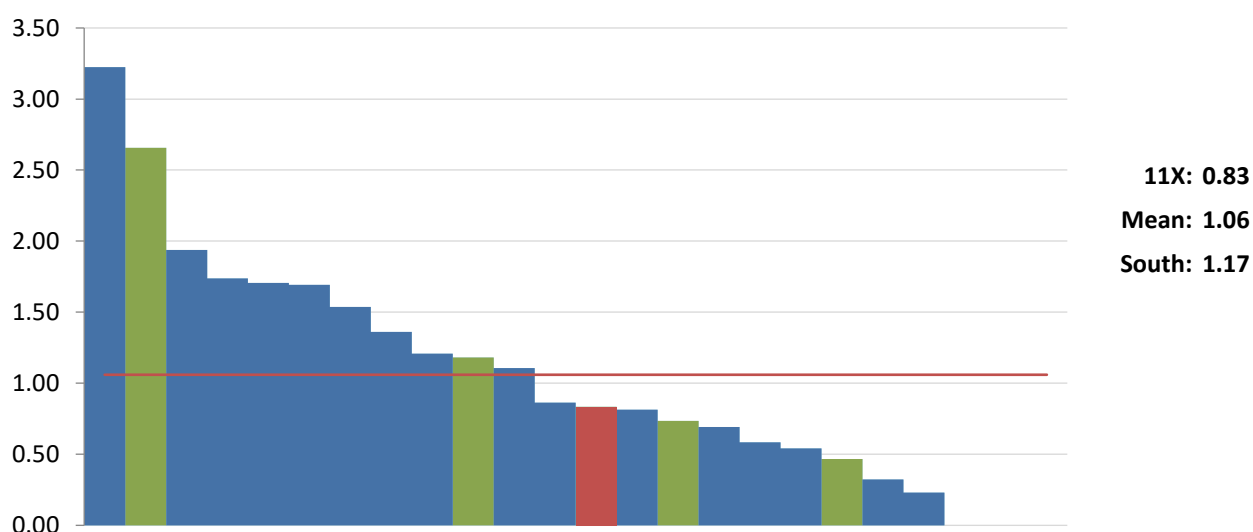


CCG primary care team

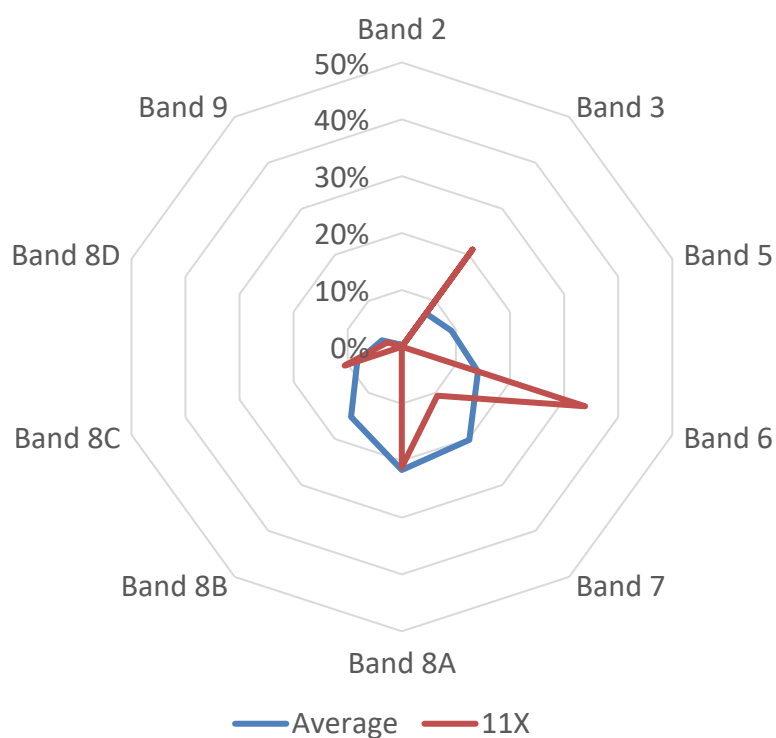
Our project looked at the work of the CCG primary care team split between 'contractual work' and 'transformational work'.

Contractual work includes financial management, GP contracting, managing estates, QOF and ES, as well as supporting mergers. The average for this is 1.06 WTE per 100,000 registered population.

Contractual work WTE total per 100,000 registered population



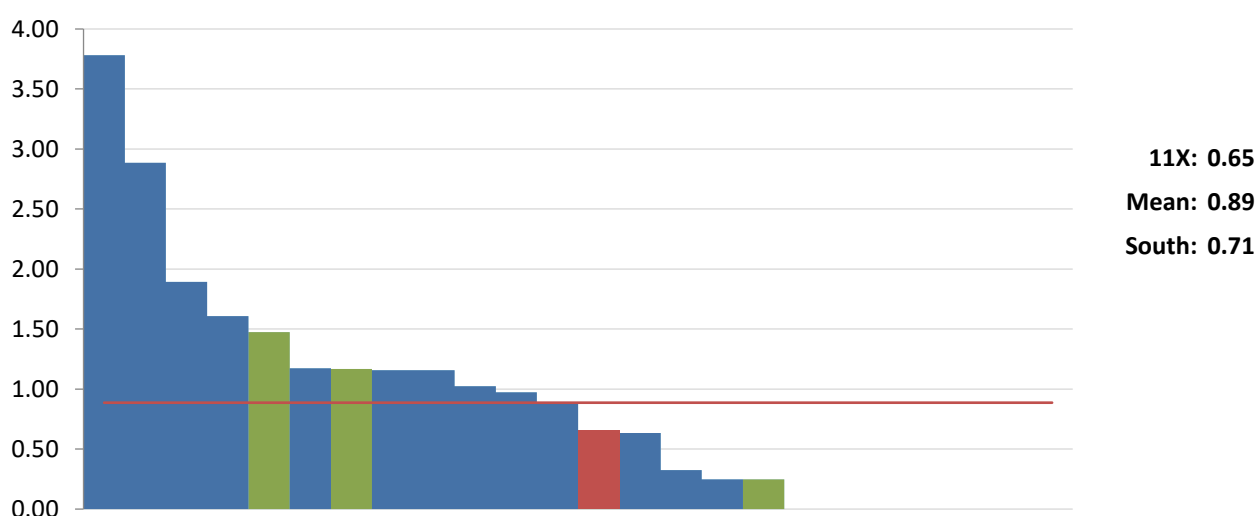
Contractual work team



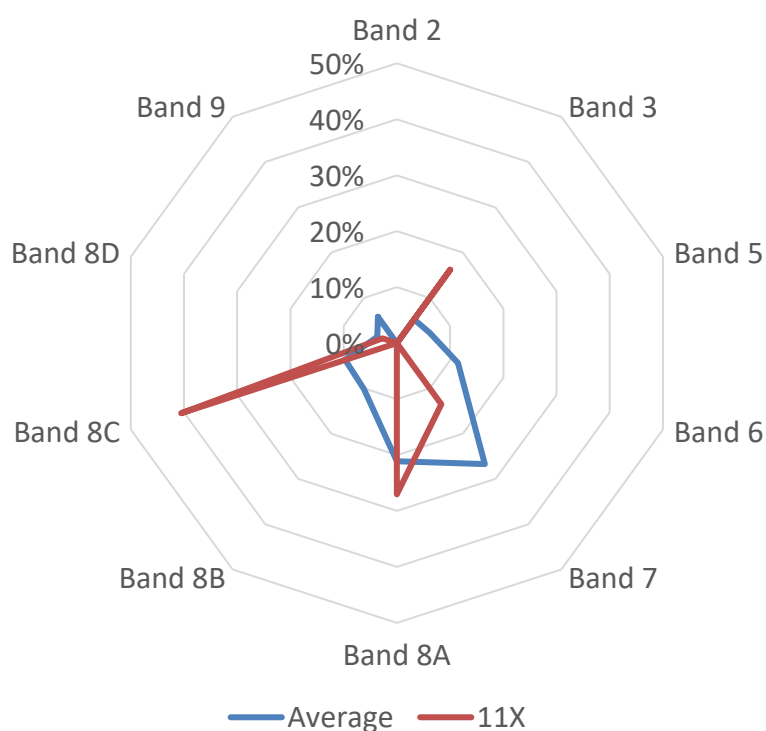


Transformational work includes locality/place-based commissioning, General Practice Forward View, Primary Care strategy and other support/mentoring. The average for this is 0.89 WTE per 100,000 registered population.

Transformational work WTE total per 100,000 registered population



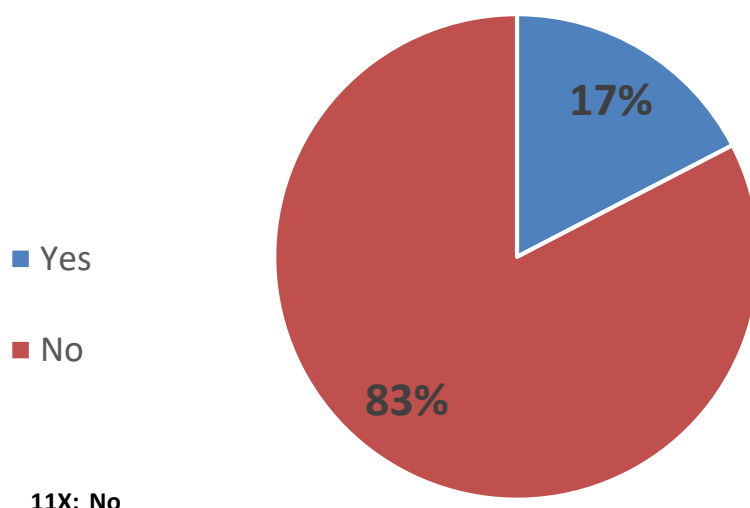
Transformational work team





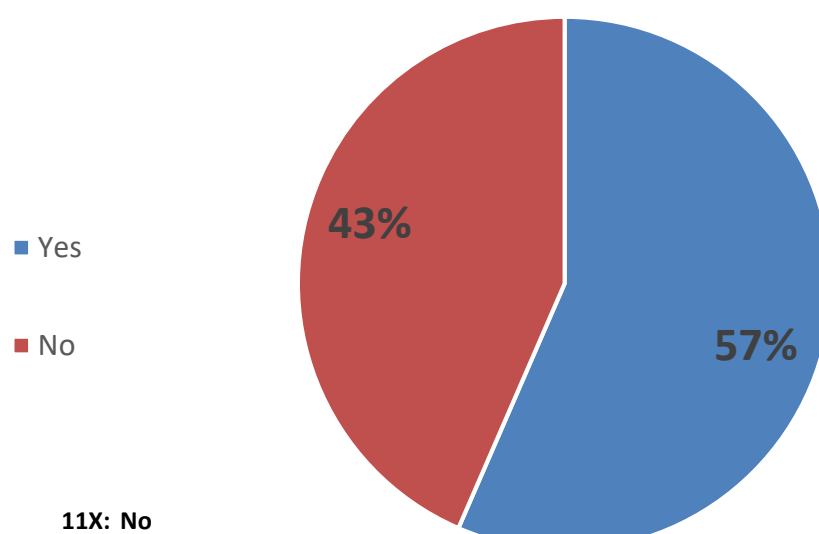
CCG primary care team processes

Does the CCG monitor the number of GP appointments?



There are approximately 340 million consultations with GPs in England each year (BMA, 2017). If a CCG monitors the number of GP appointments within their CCG, they can look at the activity at a GP practice level.

Does the CCG monitor the age of GPs within the CCG





Benchmarking Network

Conclusion

Summary

- The wide variety of national data regarding primary care services from a CCG standpoint can enable us to explore many aspects of the nature and level of GP services within a CCG area.
- CCGs rarely have the analytical sources available to analyse the raw data available and by working collaboratively with other CCGs and the Network, a core set of analysis can be done once, accurately for all CCGs, rather than being done independently hundreds of times across the country.
- Some aspects of GP services in a CCG area not available from national sources, and the benchmarking work can examine how these features vary between CCGs and between practices, by asking targeted questions in the supplementary data collection.
- Comparisons at GP practice level can be readily presented if we can agree consensus on what would be most interesting to explore, dependent on the publicly available data at GP practice level.

Key Findings

- On average, 4 WTE GPs work in each GP practice.
- 18% of GP practices are co-located with another GP practice.
- 87% of respondents stated that GP services are commissioned by the delegated commissioning model.
- Locum GPs comprise of 3.6% of the total GP workforce.
- The average DES payments made to CCGs per 100,000 registered population is £672,845.
- The average LES payments made to CCGs per 100,000 registered population is £911,259.
- On average, 80% of patients would recommend their GP surgery to someone who had just moved to the local area.
- 27% of CCGs have formal contractual meetings with GP practices in their CCG.
- 48% of CCGs work collaboratively with other CCGs in relation to commissioning primary care.
- On average, there are 0.89 WTE per 100,000 registered population that perform transformational work in the CCG's primary care team.
- On average, there are 1.06 WTE per 100,000 registered population that perform contractual work in the CCG's primary care team.



Benchmarking Network

The Primary Care Project

- Benchmarking is a simple tool to help share expertise and knowledge across the country. This report shows how data can be used to highlight variation between CCGs, identify problem areas and compare structures and processes.
- Data about CCGs primary care teams is almost completely unavailable in the NHS and there are no systems in place to ensure comparative data is available on this work, nor help good practice in this area be spread across the country. This project has highlighted that this function works differently in different CCGs.
- The Network looks forward to working with CCGs to further explore how we can better use existing data sources, such as the NHS payments to GP practices, and where there would be benefit in collecting new data to examine previously unexplored areas.



Benchmarking Network

Next Steps

Thank you for reading this pilot report.

The project will run again in 2018 and we hope that your CCG will take part.

Invitation to join the project reference group

The NHS Benchmarking Network would be pleased to hear from anyone who would like to be on the project reference group. All the Network's projects are participant led and no-one is better qualified to decide what analysis will best support primary care services within CCGs than people that actually work in CCGs.

Reference group members will advise on the most appropriate data sources to use, areas of analysis to prioritise, and nature of the outputs.

Participation will not be a significant commitment, with discussions covered by e-mail and phone. The Network will consider running a face meeting should there be sufficient interest from reference group volunteers.

If you are interested please send an e-mail to chris.mcauley@nhs.net.

The next round of the project

It is intended that the next round of the project will take place in Autumn/Winter 2018, once the national data sources covering the financial year 2017/18 are available. This is subject to feedback from participants and the reference groups.



Appendix

Name	Source	Link
NHS Payments to General Practice, England	NHS Digital	https://digital.nhs.uk/data-and-information/publications/statistical/nhs-payments-to-general-practice/nhs-payments-to-general-practice-england-2016-17
Overall weighted populations for core CCG allocations	NHS England	https://www.england.nhs.uk/publication/nhs-england-allocations-2016-17-to-2020-21-overall-weighted-populations-for-core-ccg-allocations/
Patient Survey	GP Patient Survey	https://www.gp-patient.co.uk/SurveysAndReports
General and Personal Medical Services, England	NHS Digital	https://digital.nhs.uk/catalogue/PUB30149