



Education and Prevention Committee

Interpretive Bulletin

Volume 1, No. 4

INTRODUCTION

What is the Education and Prevention Committee (EPC)?

The Ministry of Health and Long-Term Care (MOHLTC) and Ontario Medical Association (OMA) have jointly established the Education and Prevention Committee (EPC). The EPC's primary goal is to educate physicians about submitting OHIP claims that accurately reflect the service provided, thereby reducing the need to recover payments for incorrect claims.

What is an Interpretive Bulletin?

In order to achieve this goal, the EPC is developing a number of educational initiatives that are intended to help physicians submit accurate OHIP claims. One of these initiatives is the provision of regular "Interpretive Bulletins." Interpretive Bulletins will be jointly prepared by the Ministry and the OMA. The purpose of these Bulletins will be to provide general advice and guidance to physicians on specific billing matters.

The EPC will maintain an index of these Bulletins to assist physicians in referring to previously discussed topics.

Delegated Services

Purpose

The purpose of this Interpretive Bulletin is to provide physicians with information on delegated services — specifically, information regarding general principles, requirements, and common errors associated with delegated services.

Delegation

Information and rules regarding claims submission for delegated procedures can be found in the General Preamble of the Schedule of Benefits under section B10 (Page GP34).

Delegation to interns and residents in team teaching units will be discussed in a future Bulletin.

General Principles

Physicians cannot claim for personal services, such as consultations, psychotherapy, counselling, office visits, hospital visits, or emergency visits provided by nurses or other non-physician employees. With the exception of services provided by interns and residents in a teaching centre under certain circumstances, all such services must be personally

provided by the physician claiming for the service in order to be payable by OHIP.

By contrast, certain procedures can be delegated to non-physicians, such as nurses or office staff, and the supervising physician may claim for these procedures. However, there are specific requirements that must be fulfilled.

Delegation of Procedures

The General Preamble, section B10 — Delegated Procedures — describes the circumstances when a physician may, for billing purposes, delegate a procedure to a non-physician in his or her office.

For billing purposes, there are specific requirements that must be fulfilled:

- The individual performing the service must be an employee of the physician. This could be demonstrated, for example, by an employment contract, a T4 receipt, and employment insurance deductions.
- The procedure must be generally and historically accepted as being a service that can be delegated.
- For those services where “direct supervision” is required, “direct supervision” means that the physician must be present in the office or clinic where the service is rendered.
- Procedures performed by a nurse or medical assistant in the employ of a facility or organization, such as a public hospital, cannot be claimed by the physician.
- For those services listed on page GP35, where “direct supervision” is not required, claims may be submitted to OHIP only if the following conditions are met:



The Education and Prevention Committee Seeks Input on Education Billing Program

The Education and Prevention Committee was formed by the Ministry of Health and Long-Term Care and the Ontario Medical Association, under the auspices of the Physician Services Committee, to make recommendations to ensure appropriate claims to the Ontario Health Insurance Plan. The work of this Committee will benefit all physicians with respect to their interaction with the Medical Review Committee and the Ministry.

In order to ensure an appropriate billing course, the Committee requests input from your Section and input from all its members.

What do you think should be in a billing course that would benefit you, and how would you design it? Your input would be appreciated. Please forward your comments to:

Physician Services Committee Secretariat
525 University Avenue, 4th Floor
Toronto, Ontario M5G 2K7
Telephone: (416) 340-2255 or 1-800-268-7215, ext. 2255
Fax: (416) 340-2933
E-mail: secretariat@physician-services-committee.ca

EDUCATION AND PREVENTION COMMITTEE
Dr. Garry Salisbury, Co-Chair • Dr. Larry Patrick, Co-Chair

- The procedure is performed in accordance with accepted professional standards and practice. The non-physician must be properly trained.
- The procedure is performed on the physician's own patient as shown by an ongoing physician-patient relationship or a consultation/assessment on the same day.
- A locum tenens or the regular physician may claim for the procedure.
- A record of the procedure must be maintained as if the physician had personally performed the service, which includes the date of service and who performed the service.

Common Errors

The most common errors that the Ministry encounters are:

- Claims for assessments rendered by a nurse, podiatrist, chiropodist, etc. The error is that assessments cannot be delegated to non-physicians.
- Assessments claimed by one physician when performed by another physician.
- Claims for delegated services when the delegate is not the physician's employee.

Professional Issues

This Interpretive Bulletin describes appropriate billing practice only. Physicians are reminded that any delegation of controlled acts assigned to physicians under the Regulated Health Professions Act must be in accordance with the policy of the College of Physicians and Surgeons of Ontario in relation to such delegations (policy # 1-99). This policy may be found at (<http://www.cpso.on.ca/Policies/delegation.htm>).

Delegation and Supervision Working Group

Delegation issues are being reviewed by the Delegation and Supervision Working Group — a joint OMA-MOHLTC committee established by the Physician Services Committee (PSC). Its mandate is to review existing fee-for-service payment policies for the delegation and supervision of insured physician services under the Schedule of Benefits for Physician Services and, where appropriate, to recommend changes to the existing payment policies that balance the need for safety, quality, efficiency, and accountability.

Your feedback is welcomed and appreciated!

The Education and Prevention Committee welcomes your feedback on the Bulletins in order to help ensure that these are effective educational tools. If you have comments on this Bulletin, or suggestions for future Bulletin topics, etc., please contact:

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Dr. Garry Salisbury, Co-Chair
 Dr. Larry Patrick, Co-Chair

For specific inquiries regarding claims submission, please submit your questions IN WRITING to your OHIP Medical Consultant:

Kingston Office

49 Place d'Armes, 2nd Floor
 P.O. Box 48, Kingston, ON K7L 6J3
 Dr. Michael Day, phone: (613) 547-1827 - Central East Region
 Dr. Bob Thomson, phone: (613) 548-6887 - Central South Region
 Dr. Barry Guppy, phone: (613) 547-1857 - Northern/Eastern Region

Toronto Office

P.O. Box 1700 Station A
 Toronto, ON M5W 1G9
 Dr. Jude Coutinho, phone: (416) 314-7630 - Central West, South Western and Toronto Regions
 Dr. Victor Lao, phone: (416) 212-6259 - Central West, South Western and Toronto Regions