



## College of Homeopaths of Ontario

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## STANDARDS AND GUIDELINES

<b>TITLE:</b>	STANDARD ON FEES AND BILLING
<b>DOC #:</b>	Standard 9
<b>STATUS:</b>	Approved by Council
<b>CIRCULATION DATE:</b>	March – June 2013
<b>REVISED:</b>	June 2013
<b>APPROVAL DATE:</b>	July 29, 2013

*Note to Readers: In the event of any inconsistency between this document and the legislation that affects homeopathic practice, the legislation governs.*

*College publications contain practice parameters and standards which should be considered by all Ontario homeopaths in the care of their patients and in the practice of the profession. College publications are developed in consultation with the profession and describe current professional expectations. It is important to note that these College publications may be used by the College or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained.*

### POLICY

Policies set by individual clinics on fees and billing practices must be consistent with the standards of practice of the College of Homeopaths of Ontario (the "CHO").

The Registrant is accountable for the services they perform, receipts provided and the charges submitted under their name or registration number. It is the responsibility of the individual homeopath to ensure that he or she is able to maintain control over practice decisions including the fairness and accuracy of billing.

### INTENT

This standard describes the College's expectations for homeopaths involved in providing care where a bill or invoice is provided to the patient or other payer.

### PREAMBLE

It is a fundamental principle of health care ethics that care providers put the needs of their patients ahead of their own. This consideration is particularly important where decisions related to the costs and charges for the provision of care are required. It is essential that the fees charged to patients are reasonable, accurate, and transparently communicated to ensure that patients can make an informed choice about the financial aspects of their care.

It is acceptable to profit from ones' knowledge, education and experience, and professional judgment regarding the ethical application of fees and billing.



## DESCRIPTION OF STANDARD

### Fees and Billing

The Registrant establishes and maintains fair and ethical fees and billing practices by:

1. Ensuring that a fee schedule(s) is established, posted and/or documented that outlines:
  - a. the fees for initial consultation, assessment and treatment;
  - b. the fees for other services or products;
  - c. any administrative fees (e.g. charges for photocopies or reports, surcharges for late payments, etc.); and
  - d. penalties for missed or cancelled appointments.
2. Ensuring that patients are informed of the fees to be charged for homeopathic services and consent is obtained prior to treatment.
3. Ensuring that any departure from an established or documented fee schedule is used only to reduce fees. While it may be acceptable to provide consistent discounts or waiver of a fee in circumstances or hardship, it is not acceptable to increase a fee based on a patient's ability to pay.
4. Providing information to patients that includes:
  - a. information on fees and the fee schedule specific to the patient's circumstances;
  - b. the basis on how a bill for services is calculated;
  - c. any relevant financial policies and/or payment expectations; and
  - d. the acceptable methods of payment and any peculiarities of those methods.
5. Reviewing invoices and billing practices at periodic intervals in order to ensure:
  - a. the accuracy of invoices;
  - b. an understanding of the fees that are being charged for their services;
  - c. an understanding of how their registration or billing number is being used; and
  - d. that when abnormalities are discovered, reasonable steps are taken to remedy the situation.
6. Ensuring that processes exist for the timely:
  - a. notification of any balance due or owing; and
  - b. provision of applicable refunds.
7. Ensuring that the financial records are in keeping with the College standards of practice.
8. Bartering only in accordance with the Canada Revenue Agency guidelines.
9. Not charging a block fee.
10. Refraining from offering or giving a reduction in fees for prompt payment of services.
11. Documenting and displaying its policy on the purchase and redemption of vouchers or gift certificates.
12. Refraining from selling or assigning any debt owed to the Registrant. This does not include the use of credit cards to pay for professional services.



## Receipts

1. Registrants shall issue a receipt for all payments.
2. Receipts will clearly and legibly record:
  - a. name of treating homeopath, clinic name, address, telephone number;
  - b. Registrant's registration number;
  - c. patient's name and address;
  - d. date of service;
  - e. services billed;
  - f. payments received;
  - g. balance owing;
  - h. HST registration number, if HST charged.
3. If a replacement receipt is issued it is clearly identified as a "COPY" or "DUPLICATE".
4. Receipts will be clearly itemized. Fees for homeopathic consultation are separated from all other fees. Fees for medicine, supplements, etc., are individually listed, either on the same or another receipt.

## Advertising of Fees

1. The advertisement contains accurate, complete and clear disclosure of what is and what is not included in the fee without hidden fees or costs. The public is entitled to full disclosure of what is and what is not included in the advertised fee.
2. The Registrant may not bill a third-party payor for the complimentary portion of the consultation or treatment service.
3. The advertisement expressly states the timeframe to be honoured for any complimentary or discounted service.
4. To ensure there is no confusion or misunderstanding, the advertisement must indicate the exact timeframe in which the complimentary or discounted consultation or treatment services apply.
5. No obligation is placed on the patient for follow-up appointments as a result of the complimentary or discounted service.
6. The advertisement does not limit the offer to a certain number of participants. Members of the public must all be given an equal opportunity to obtain the advertised complimentary or discounted services. An advertisement that limits an offer to a certain number of participants may be misleading.

## What is a Block Fee?

A block fee is an agreed upon fee for a series of services (e.g., 10 visits or a period of time). Typically the fee is less than if the services were paid for individually, but is paid in advance. To work in everyone's interest the nature and extent of the service must be known in advance, and provide for options of refunds on a reasonable scale at the patient's request. As homeopathy takes an individualistic treatment approach without a standardized



algorithm, the nature and extent of services is unknown and lacks predictable consistency. The Professional Misconduct Registration provision 20 **does not** permit Registrants to charge a block fee.

The fundamental basis of block fees discriminates against the individual's ability to access cheaper service based on economic status. This provision serves to protect the patients from pressure to purchase service packages, from billing disputes and from discrimination based on economic status.

Registrants are allowed to discount per service individual fees at their discretion.

### RELEVANT COMPETENCIES AND PERFORMANCE MEASURES

*Competencies are the specific knowledge, skills, attributes and abilities required of an entry-to-practice homeopath in order to practise safely and ethically. These competencies, from the Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario, were adopted by the transitional Council of the College of Homeopaths of Ontario in 2012.*

2.25 Inform the patient and obtain informed consent regarding the nature of the homeopathic process including:

#### RELEVANT PERFORMANCE INDICATORS

1. Obtain informed consent throughout consultation and treatment.
  - f. Fee schedule.

#### RELEVANT PERFORMANCE INDICATORS

1. Explain fee structure for services.
2. Explain fee structure for products and medicine.

3.3 Develop administrative and management skills (e.g., maintaining patients' and financial records, managing staff). (10)

#### RELEVANT PERFORMANCE INDICATORS

1. Demonstrate administrative skills.
2. Demonstrate office management skills.

3.6 Develop and maintain appropriate billing practices as per standards, regulations and guidelines. (10)

#### RELEVANT PERFORMANCE INDICATORS

1. Develop appropriate billing practices as per standards, regulations and guidelines of the College of Homeopaths of Ontario.
2. Maintain appropriate billing practices as per standards, regulations and guidelines of the College of Homeopaths of Ontario.

### DEFINITIONS

For the purpose of this standard the following definitions apply:

#### Block Fee

Block fee is a flat fee charged for a predetermined set of services.



## Homeopath

“Homeopath” means a registrant of the College of Homeopaths of Ontario.

## Registrant

A Registrant is a member of the College of Homeopaths of Ontario.

## LEGISLATIVE CONTEXT

Unfair or Deceptive Acts or Practices Regulation

*Personal Health Information and Privacy Protection Act (PHIPA)*

*Personal Information Protection and Electronic Documents Act (PIPEDA)*

Registrants are reminded that the following provision may apply to this standard under *Homeopathy Act, 2007, Ontario Regulation 315/12 Professional Misconduct* (Note: This regulation is not yet in force. It comes into force on the day named by proclamation of the Lieutenant Governor.):

17. Issuing an invoice, bill or receipt for services that the member knows or ought to know is false or misleading.
18. Charging a fee for a homeopathic treatment or service that is not provided or for a homeopathic treatment or service that is not performed. This provision does not apply to a fee for an appointment that was cancelled without reasonable notice.
19. Failing to advise a patient or a patient’s authorized representative, prior to providing a service, of the fee to be charged for the service or of any penalties that will be charged for late payment of the fee.
20. Charging a block fee.
21. Failing to itemize an account for professional goods or services provided to a patient.
22. Breaching, without reasonable cause, an agreement with a patient or a patient’s authorized representative relating to professional services for the patient or fees for such services.
34. Failing, without reasonable cause, to provide a report or certificate relating to a treatment performed by the member within a reasonable time to a patient or the patient’s authorized representative after the patient or his or her authorized representative has requested such a report or certificate.
47. Selling or assigning any debt owed to the member for professional services. This does not include the use of credit cards to pay for professional services.

## RELATED DOCUMENTS

Because of the inter-relationship of various issues related to practice management (i.e. fees and billing, advertising, conflict of interest and maintaining financial records), it is advisable to review this standard in partnership with the standards and guidelines for Advertising, Conflict of Interest, Record Keeping, Professional Ethics and Informed Consent.

## SOURCE

Transitional Council of the College of Naturopaths of Ontario  
College of Physiotherapists of Ontario