# **COLLEGE OF CHIROPODISTS OF ONTARIO**

FEES, BILLING AND ACCOUNTS GUIDELINE

Approved by Council: October 28, 2022 Amended: September 22, 2023

# FEES, BILLING, AND ACCOUNTS GUIDELINE

The College of Chiropodists of Ontario (COCOO) has created this guideline to assist Members in understanding their legal and professional responsibilities in relation to fees, billings, and accounts. The standards and regulations, in particular Ontario Reg. 203/94 (General) and Ontario Reg. O. Reg. 750/93 (Professional Misconduct), specifically set the obligations that Members are required to comply with in respect to fees, billings, and accounts and there is no substitute or excuse for Members to not inform themselves of the requirements and comply with those requirements. Members are required to comply with their professional and statutory obligations with respect to fees, billings and accounts regardless of particular employment circumstances or contractual arrangements with a clinic. It is incumbent upon every Member to understand their obligations and to also explain those obligations to their employers and to clinic owners. This document is intended to assist and guide Members in that regard.

In the event of any inconsistency between this guideline and any legislation that governs the profession, the legislative requirements prevail.

# A. Accountability

Members are accountable for any fees, billings or accounts that use their name or registration number and/or are issued or charged for services or treatments rendered by the Member. All Members must be aware of how their name and registration number are being used and to involve themselves and be knowledgeable of the billing practices of the clinic. Members are also required to ensure that appropriate records are created and maintained, as required by COCOO standards, regulations, and this guideline.

# **B. Accuracy and Honesty**

Members must ensure that any fees, billings or accounts that use their name and registration number and/or are issued or charged for services rendered by the Member are an accurate reflection of the services and/or products provided. Members must never charge fees or create billings or accounts that are inaccurate, false, misleading, or excessive.

Members are required to have a written process for routinely reviewing their fees, billings or accounts. Members must be able to demonstrate to the College's satisfaction that they did the review. The review process must ensure that:

• Any fees charged are accurate and reasonable

• Billings or accounts are accurate

In the event that a Member discovers as part of the review any inaccuracies or errors with respect to fees, billings or accounts and/or inappropriate billings or billing practices by the clinic where they practice, the Member must:

- take reasonable steps to correct and appropriately report the inaccuracies or errors, and
- document the finding, what action was taken, and the outcome.

#### C. Fee Schedule

Members are required to have a written fee schedule for routine treatments, products, and procedures. The fee schedule shall include:

- Fees for assessment, reassessment, and treatment
- Fees for other services or products
- Fees for administrative tasks (such as photocopying a patient record, completing a form, etc.)
- Late payment penalties or interest charges
- Charges for cancellations or missed appointments.

Members must ensure that fees charged by them and/or on their behalf are not excessive, false or misleading. Any departure from the Member's established fee schedule can only be to reduce fees. Members are permitted to offer discounts from their standard fees (for example, a senior or student discount). However, such discounts must apply to all patients who meet the criteria for the discount.

Furthermore, under no circumstances are Members permitted to charge higher or different fees for products, services, or treatments based on the patient's available insurance coverage. A Member's standard fee and/or eligible discounts must apply to all patients, regardless of available insurance coverage.

# **D. Communicating Fees to Patients**

Before providing care, Members must ensure that patients are given clear information about fees and that patients understand the information. This includes:

- All fees that might apply to the patient
- All discounts that apply to the patient
- How bills or accounts for services are calculated
- Any financial policies that might affect the patient, such as payment expectations and late payment charges
- Methods of payment that are accepted.

Members are required to provide an itemized account for services and/or products if the patient or a third-party payer requests one and/or if the account includes a commercial laboratory fee or orthotics fee. An itemized account must be provided free of charge.

If a Member is aware that they, or the clinic or facility where they practise, have been delisted by an insurance provider, the Member has a professional responsibility to inform the patient or ensure that patients are informed prior to booking an appointment and/or providing any treatment.

# E. Block Fees

Members shall not charge block fees or set fees for packaged or bundled services unless:

- the patient is given the option of paying for each service as it is rendered, and
- if requested by the patient, the unit cost for each type of service covered by the block fee is specified.

As with other aspects of the COCOO standards and regulations addressed in this guideline, Members are required to ensure that their fees, billing and/or accounts in relation to block fees appear accurately, are not false, misleading, or excessive, and are documented appropriately.

# F. Conclusion

Members are responsible to ensure that their fees, billings, and accounts, and the billing practices of the clinic where they practise, reflect the highest ethical standards of the profession and enhance the public image of the profession. The professional obligations related to fees,

billing, and accounts set out in the College's standards, regulations, and this guideline apply to all Members of the profession, including Members who are full-time or part- time employees of a clinic and/or contract workers at a practice location. For greater clarity, all Members, regardless of their relationship to the clinic or practice location at which they treat patients, shall comply with these professional obligations without exception. If Members have questions or are unsure of their obligations in relation to fees, billings, and/or accounts, Members are encouraged to contact the College and obtain advice in that regard.