



## Special Interest Articles

Continuing Competence Program

Fraudulent Billing and the Physiotherapist

Did you know?

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## Editor's Note

Lori Graumann, Newsletter Editor

### Happy Holidays everyone!

Hopefully you can find some time in the midst of this busy season to sit down and read through the December issue of "In Touch".

This month, we have included an informative article about fraudulent billing, and with tax season fast approaching, the "Did you know?" section will alert you to a

physiotherapist's responsibilities as a practitioner who is qualified to complete a Disability Tax Credit Form.

When you have finished reading this month's issue, I hope you will also take a few moments to complete a very brief online newsletter survey designed to gather your opinions and ideas about the newsletter.

The survey can be found at <http://manitobaphysio.com/survey.html>

Thank you in advance for taking the time to provide this valuable feedback!

Contact me by email: [cpmnews@manitobaphysio.com](mailto:cpmnews@manitobaphysio.com)

## Continuing Competence Program

Gil Magne, Continuing Competence Committee Chair

As the renewal packages are being sent out, some of you will notice an additional component. For the last several months, we have been talking about the new Continuing Competence Program (CCP) at the College. The first phase of the program involves a Pilot Program, asking 20% of the membership to complete the Learning Plan and Portfolio components of the CCP. The information collected from this Pilot will lead to positive changes and fine tuning of the program, prior to implementation next year.

Further information about the Continuing Competence Program can be found on the CPM website at:

<http://manitobaphysio.com/contincomp.html>

This includes the presentation that was done to the membership in October and November, some Frequently Asked Questions (FAQ), the Learning Plan and Portfolio Guide, and contact info should you have any further unanswered questions.



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## Fraudulent Billing and the Physiotherapist

What is fraudulent billing? A recent Google search found the following definition of Health care fraud:

“Health care fraud includes any scheme involving the health care industry that is designed for illegal financial gain. These schemes may include billing for services not rendered, inflating the cost of the service provided, the deliberate performance of medically unnecessary services, and the payment of “kickbacks,” illegal payments designed to guarantee awarding of a contract or the exclusive right to provide a service.” (Federal Bureau of Investigation, “Health Care Fraud: National and Local Perspective on a Growing Trend”, August 1999, <http://www.fbi.gov/contact/fo/norfolk/hcf.htm>).

What does this have to do with Physiotherapy? Across Canada physiotherapists continue to have complaints filed against them regarding fraudulent billing practices. It is the College of Physiotherapists of Manitoba’s position that it is the physiotherapist who is accountable for the business practices related to their physiotherapy services and frequently monitoring these practices helps you to determine if you are meeting the College’s standards.

One way to determine if you are meeting the standard is ensuring that your billing number is used appropriately. The amount of information you are required to know regarding fees and billing for physiotherapy services will vary depending on your work environment. For example, in a hospital there may be only a few specifics you need to know (i.e. the cost of aids sold such as crutches) whereas a physiotherapist who is self - employed or an employee of a clinic may require additional information. For example, if you are working in a private clinic you may not be directly responsible for creating the invoices sent out on your behalf; however, it is the College’s position that you monitor the accuracy of the invoices (administered for the services you provided) on a regular basis.

Fraudulent billing complaints noted by Regulators have included billing under the wrong therapist’s name and billing for treatments not provided to a client. For example a third party payer receives a number of invoices for Physiotherapy treatment by a therapist (identified by the billing number on the invoices) who was not working at the clinic when the treatments were provided. Additionally complaints have been received when a client’s third party payer receives an invoice for ten Physiotherapy treatments. However the client only booked and attended eight treatments. Remember it is your responsibility to ensure the standard set by the College is being met.

## Fraudulent Billing and the Physiotherapist-continued

Position statement 4.21 "*Physiotherapists working for non-physiotherapists*" reads:

"The physiotherapist assumes responsibility for verifying that business arrangements do not violate the ethical principles of the profession by:

- i) Ensuring that professional accountability takes precedence over the financial interests of the business
- ii) Assuming responsibility for decisions related to professional practice
- iii) Adhering to the Code of Ethics of the College

A written contract shall contain an agreement between the physiotherapist and his or her employer or principal as follows:

- a) The physiotherapist shall be responsible for and is authorized to make all decisions relating to the standards of the physiotherapist's professional practice."

Fraudulent billing may also be a risk when a physiotherapist uses support personnel. How? By billing for physiotherapy services provided by Physiotherapist Support Personnel or physiotherapy students under the licensed Physiotherapist's billing number.

Practice statement 4.8 "*Physiotherapists assigning physiotherapy care (support personnel)*" indicates clearly that:

"The physiotherapist is responsible and accountable for the physiotherapy care of the client including any components of care that are assigned to support personnel by a physiotherapist. If the standards of practice are not met or harm comes to a client as a result of assigned physiotherapy treatment rendered by support personnel, the physiotherapist is accountable."

The issue of billing is addressed specifically under *Physiotherapist Accountability item #6 - Billing*:

"Physiotherapists who bill for their services on a fee-for-service basis should ensure that the funder is aware if the services are provided by support personnel. Some funders require and expect service provided by support personnel to be billed at a different rate. In no circumstances should the funder be misled or confused as to who provided service."

It is the College's position that you should be transparent and accurate about what service is being provided, by whom, and how that service is being billed.

The PT Standards Committee is currently reviewing a number of the standards for the College. Updating these standards helps educate our membership on its responsibilities as a Physiotherapist in Manitoba. Additionally the Continuing Competence Committee will be building the practice visits around topics such as billing/business practices. The College encourages the membership to stay informed by reading the updates as posted on the website at [www.manitobaphysio.com](http://www.manitobaphysio.com).

*Next article:* Working for non-physiotherapists - What you need to know.



*"It is the College's position that you should be transparent and accurate about what service is being provided, by whom, and how that service is being billed."*



## Did you know?

### Patient Disability Tax Credit - Information for Physiotherapists from Revenue Canada

Since 2005, physiotherapists have been identified as a “**qualified practitioner**” who may complete Form T2201 – Disability Tax Credit Certificate. Revenue Canada (CRA) has posted information on their new web pages ([www.cra.gc.ca/qualified-practitioners](http://www.cra.gc.ca/qualified-practitioners)) regarding this disability tax credit and the qualified practitioner’s responsibilities when completing a T2201 form. The web pages are designed to help practitioners and include the following information:

#### “Topics for qualified practitioners:

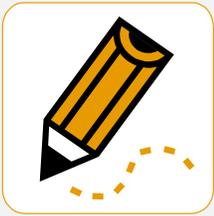
- [What is the disability tax credit \(DTC\)?](#)  
Find out about this credit and who may be eligible to claim it.
- [Patient's medical conditions](#)  
Find out the differences between the impairments and the criteria that is required for a patient to qualify for the disability tax credit.
- [Practitioner's responsibilities - completion of Form T2201](#)
- [Clarification letters](#)  
Find out what we need from you in order to finalize our review of your patient’s application for the disability tax credit.
- [Why do I have to certify separate forms for different disability-related programs?](#)  
Fundamental differences between CPP disability benefits and the disability tax credit.”

(Reference: [www.cra.gc.ca/qualified-practitioners](http://www.cra.gc.ca/qualified-practitioners). Accessed Nov. 24, 2010)

FYI for those members who practice acupuncture in Manitoba:

#### **IMS Plunger - Stop Order Reconfirmed**

Alberta Health and Wellness (AHW) recently reconfirmed a stop order on reusable IMS plungers remain until validated cleaning and reprocessing instructions are received from IMS manufacturers/distributors. The decision was communicated to IMS manufacturers/distributors along with the necessary steps required before the stop order can be lifted.



## Did you know? – continued

The stop order was issued by Alberta's Acting Chief Medical Officer of Health because of the risk of transmitting blood borne infections from patient to patient and manufactures instructions with some IMS plungers were not sufficiently detailed to enable users to determine the required process to correctly reprocess for safe re-use.

Office of the Chief Medical Officer of Health

Alberta Health and Wellness, Government of Alberta

(Reprinted from the newsletter: *ALBERTA PT* Fall 2010 published by the Physiotherapy Alberta College + Association)

In Manitoba the College recommends single use, sterile, disposable needles only. Please refer to the Practice Statement **4.6 Acupuncture and Intramuscular Dry Needle Therapy** for additional information.

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*The mission of CPM is to protect the public interest by regulating and continually improving the practice of physiotherapy in Manitoba.*



**We're on the Web!**  
See us at:  
[www.manitobaphysio.com](http://www.manitobaphysio.com)

## CPM Registration Renewal 2011

Renewal Reminder notices have been mailed out to members on December 13, 2010. The College renewal procedure is done online. Renewal forms will not be mailed out to members unless requested.

There will be a computer available during renewal for registrants to use at the College office.

Renewal will commence January 1, 2011 until January 31, 2011.

Late renewals will be subject to a 20% late fee.

If you require assistance with the renewal procedure, please contact Virginia Kaskiw, Registration Coordinator at: 287-8502

## Save the Date! CPM 2011 AGM

The 2011 AGM will be held on Thursday, April 28, 2011 from 6:00 PM until 9:00 PM.

The location will be: Masonic Memorial Temple Ltd, 420 Corydon Ave, Winnipeg, MB (located at confusion corner) please stay tuned for announcements of guest speakers and other agenda items.

**CPM wants to see you there!**