

Billing Bulletin

Billing Bulletin No. 12

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IMPORTANT HEALTH WEBSITE LINKS

All Medical Services Branch Payment Schedules, Newsletters, Operations Bulletins, Billing Bulletins, Billing Information Sheets and forms are available at:

<https://www.ehealthsask.ca/services/resources/establish-operate-practice/Pages/Physicians.aspx>

CONTACT INFORMATION HAS CHANGED

For inquiries related to the following areas, the contact numbers have changed:

- Physician Billing Inquiries
- Claims Processing Support Inquiries
- Physician Billing Education Inquiries

Please contact the Business Support Desk at 1-800-605-2965 where your call will be routed to the appropriate area for support. The Business Support Desk is open Monday to Friday, 8:00 a.m. to 5:00 p.m., but is closed evenings, weekends and on Government of Saskatchewan observed statutory holidays.

For **physician audit and professional review inquiries**, the contact information remains the same:

Policy, Governance and Audit Unit

Fax: 306-787-3761

Email: MSBPaymentsandAudit@health.gov.sk.ca

BILLING RESOURCES & BILLING INFORMATION SHEETS

There are important billing resources available on the eHealth website. These documents are provided to all new physicians upon registering with Medical Services Branch (MSB). They are also available for download or viewing at the above link. Physicians should ensure that they avail themselves of this important information.

ONLINE BILLING COURSE

Please note that the online billing course is temporarily unavailable until further notice.

CUSTOMER PORTAL TRAINING AND EDUCATION

For training related to the new claims processing system and customer portal, please visit:

<https://www.ehealthsask.ca/services/CustomerPortal/Pages/Training>

STATUTORY HOLIDAYS FOR THE PURPOSES OF BILLING TIME-OF-DAY PREMIUMS AND/OR SPECIAL CALL/SURCHARGES:

Please be advised that statutory holidays for the purposes of billing any type of time-of-day premium or special call/surcharge are according to the Government's observed/designated holidays listed below and may be different than the Saskatchewan Health Authority designated holidays.

HOLIDAY	ACTUAL DATE	OBSERVED/BILLED ON
Good Friday	March 29, 2024	March 29, 2024
Victoria Day	May 20, 2024	May 20, 2024
Canada Day	July 1, 2024	July 1, 2024
Saskatchewan Day	August 5, 2024	August 5, 2024
Labor Day	September 2, 2024	September 2, 2024
Thanksgiving Day	October 14, 2024	October 14, 2024
Remembrance Day	November 11, 2024	November 11, 2024
*Note: <u>For the purposes of billing</u> there is no statutory holiday observed on Easter Monday.		

AUDIT & INVESTIGATIONS

JOINT MEDICAL PROFESSIONAL REVIEW COMMITTEE (JMPRC)

The JMPRC is a legislated, *physician peer-review committee* with two (2) physicians appointed by each of the Saskatchewan Medical Association, the College of Physicians and Surgeons of Saskatchewan and the Ministry of Health.

The JMPRC is responsible for *reviewing a physician's pattern of medical practice associated with billing*. The Committee has the authority to review a physician's billings over a 15-month period, request copies of medical records, and interview physicians with respect to their pattern of medical practice. If a physician's pattern of medical practice is deemed to be unacceptable by the JMPRC, it has the legislative authority to order a physician to repay monies to the government.

Some of the most commonly identified issues are:

- Inadequate and incomplete documentation;
- Misuse of EMR macros and templates;
- Frequency of non-medically required services;
- No documentation of start and stop times for time-based services;
- Upcoding of lowering paying service codes to higher paying service codes;
- Billing for services that are not provided; and
- Billing uninsured services.

Summary of All Monies Ordered to be Recovered:

The following is a summary of all monies ordered to be repaid by physicians due to inappropriate billings and/or an inappropriate pattern of medical practice in the last three fiscal years (April 1 to March 31):

Fiscal Year	Total Amount Ordered to be Recovered	No. of physicians	Average Recovery per Physician
2021-22	\$2,002,408	10	\$198,500
2022-23	\$2,567,089	10	\$256,709
2023-24	\$1,343,271	7	\$191,896

To learn more about the JMPRC, you can access the billing information sheet here:

[JMPRC Billing Information Sheet](#)

BILLING AUDITS AND INVESTIGATIONS

Medical Services Branch has a legislative obligation to protect tax-payer funded services and ensure that the use of these funds is appropriate and aligns with existing legislation. Minimizing loss and ensuring government accountability to a publicly funded system are key.

The use of routine audits are an effective method used to deter and identify the potential misuse and overuse of public funds. Eliminating and deterring inappropriate billings that have minimal evidence of a patient benefit or cost-effectiveness can reduce potential harm to patients and excessive costs to the publicly funded system. This, in turn, leaves more money available to potentially address unmet health care needs and to ensure the best possible distribution of public resources.

Billing audits and investigations can be initiated in a wide variety of ways. MSB undertakes routine audits on a regular basis, but investigations can also be initiated through inquiries and [complaints from physicians or other members of the public.](#)

If physicians or other members of the public have potential concerns about a physician's billing practices, they are encouraged to contact Policy, Governance and Audit at:

MSBPaymentsAndAudit@health.gov.sk.ca

To learn more about physician audits, you can access the information sheets here:

[Routine Audit Billing Information Sheet](#)

[Payment Integrity \(Audit\) Billing Information Sheet](#)

REFERRALS TO THE COLLEGE OF PHYSICIANS AND SURGEONS OF SASKATCHEWAN (CPSS)

Medical Services Branch would like to make physicians aware that any potential inappropriate billing issues identified by MSB may be referred to the College of Physicians and Surgeons of Saskatchewan for further investigation and possible disciplinary action.

Physicians have an obligation pursuant to *The Medical Professional Act, 1981 (section (46))* and the CPSS' Code of Ethics (7.1) to ensure that the billings they submit for payment are appropriate and align with legislation. In some circumstances, physicians may be disciplined by the College pursuant to section (46) of the *Act*.

SERVICES BILLABLE BY A PHYSICIAN WHEN NOT PERSONALLY PERFORMED 898L (removal of sutures) and 52T (Simple cerumen removal)

Under the heading “**Services Supervised by a Physician**” in the Physician Payment Schedule it outlines the circumstances under which a physician can bill for services when they are not personally performed by the physician.

**Removal of sutures (898L) and cerumen removal (52T)
are NOT billable when performed by someone other than the physician.**

If these services are performed by the physician's employee, such as a nurse, they are not billable.

SECTION E – PSYCHIATRY**REPETITIVE TRANSCRANIAL MAGNETIC STIMULATION (rTMS) (43E) BILLED IN CONJUNCTION WITH FOLLOW-UP ASSESSMENTS (7E)**

All services billed to the publicly funded system must be medically required and fulfill the descriptor as outlined in the Payment Schedule. Billing a follow-up assessment in conjunction with an rTMS service must be medically required, clinically indicated, and all billing and documentation criteria must be fulfilled in order to be billable.

Follow-up assessments cannot be billed as a routine “add-on” each time an rTMS service is billed when no follow-up assessment was performed, it was not medically required or clinically indicated, and/or it was incompletely documented.

It would be expected that follow-up assessments in this context would typically be performed when medically required at specific intervals based on the patient’s individual circumstances. The medical record must establish medical necessity and confirm that all the requisite documentation criteria has been met.