CSASK

Billing Practice Guideline

Effective: January 2023

CSASK collaborated with a working group of Audiology and Speech-Language Pathology registrants who deliver fee-based services. These guidelines provide information, direction, guidance, and recommendations regarding ethical, transparent, and professional billing practices. Registrants are encouraged to also reference the CSASK code of ethics. Common examples are provided but do not represent every situation or address all ethical questions that may arise during professional practice, therefore, CSASK staff are available to discuss unique situations with registrants by email, phone or videoconference. These Billing Practice Guidelines were approved by the CSASK Council on January 25th, 2023.

CSASK Responsibilities

- Protect the public by regulating the professions of audiology and speech-language pathology;
- Maintain a public registry of CSASK registrants that is accessible to the public;
- Respond to claim-related inquiries (e.g. from insurance companies) pertaining to audiology and speech-language pathology services:
  - by providing information on general billing practices of audiologists and speech-language pathologist in compliance with relevant CSASK documents.
  - by confirming the registration status of professionals.
- Provide guidance, direction and support to registrants who are navigating complex billing situations;
- Develop supporting documents:
  - for the public (e.g. Private Practice FAQs).
  - for registrants (e.g. Guidelines: Billing Practices)

CSASK Registrant Responsibilities

- Comply with legislative requirements and standards for their entire scope of practice including: billing/invoicing, financial record keeping and fees;
- Engage in transparent communication with clients about licence status and clinical experience/competencies;
- Ensure the fee charged for products/services are justifiable;
- Provide transparent information to the client(s) or third-party payer(s) regarding fees and payment options;
- Advise clients to contact their insurance provider to be familiar with their benefit plan and any coverage restrictions;
- Provide accurate, detailed invoices and/or receipts in a timely manner;
- Maintain accurate financial records.

Clients/Patients/Policy Holder Responsibilities

- Be familiar with the health benefit plan and its restrictions;
- Inquire about the following:
  - audiology and speech-language pathology coverage and restrictions (e.g. travel).
  - service provider coverage and restrictions:
    - licence status
    - support personnel
  - amount of coverage per year
  - anniversary date of the health benefit plan
  - additional information required on an invoice

Billing Practices – Examples

Acceptable Billing Practices	Problematic Billing Practices
• The fees for products/services is fully disclosed (e.g. travel, report, preparation time, consultation)	• The fees are misleading and do not include all anticipated costs.
• The invoice and/or receipt contains accurate information by clearly itemizing: o the product(s) and service(s) delivered o the date(s) that services were rendered o the fees charged and/or received	• The invoice and/or receipt contains falsified or misleading information by: o altering the date of services provided o misrepresenting the service delivered o falsifying the fees charged and/or received o invoicing under a separate name once policy limits have been reached for a client's insurance coverage.
• The identifying information of the person receiving the professional product or service, is clearly reflected on the invoice. ***Note:*** *The individual with the communication or hearing disorder is the "client" and is reflected as the recipient of the product/service on the invoice.* o For example: where a family member/caregiver is receiving training on how to use a new hearing aid or technology with a child, the invoice is issued under the child's name.	• The identifying information of the person receiving the professional product or service is misrepresented on the invoice. ***Note:*** *The family member/caregiver is incorrectly listed on the invoice as "the client" in instances where a family member/caregiver is receiving communication training.* o For example: The invoice lists the parent as "the client" when receiving coaching/guidance to carry-out goals or learn strategies to support communication with an individual with a communication disorder.
• The identifying information of the person providing the professional product or service is clearly reflected on the invoice. o For example: the support personnel's name is listed as the service provider; the supervising Aud/SLP's name is added as "Supervising" as they were directly/indirectly involved with the client, and this is reflected in the client notes.	• The professional providing service is misrepresented on the invoice. o For example: the supervising SLP/AUD is the only provider listed on the invoice when direct services were in fact provided by the support personnel.
• The invoice includes accurate credentials and registration status. The service provider and licence status listed on the invoice matches the professional who is listed in the clinical notes. o For example: the Aud/SLP correctly uses their reserved professional title as listed in their licence letter (Speech-Language Pathologist, Speech-Language Pathologist – Provisional, Speech-Language Pathologist – Temporary). A supervising Aud/SLP, is added as supervisor as they were providing direct/indirect supervision, and this is reflected in the client notes.	• The invoice fails to include the service provider's licensing category where the registrant's status is subject to conditions, limitations or restrictions in practice o For example: a provisional registrant incorrectly used the title Speech-Language Pathologist/Audiologist with the omission of the word "Provisional".

References

In Saskatchewan, audiologists and speech-language pathologists must adhere to the ethical standards in all areas of practice in accordance with the CSASK Code of Ethics. These practices include fees, billing/invoicing, and financial record keeping. Registrants hold the responsibility of familiarizing themselves with the CSASK Code of Ethics and all documents linked below. A few sections of the Code of Ethics have been highlighted below:
The CSASK Code of Ethics **Section 12: Records** (a) states the following:

a) prepare and maintain adequate records of professional services provided, and products dispensed, in a timely fashion."

The CSASK Code of Ethics **Section 16**: **Best Business Practices** (a), (b), (c) and (e) state the following:

"Members shall:

a) ensure that their promotion(s), sales, and fees for products and/or services for clients are appropriate and fair.

b) disclose prior to providing any services or products, the fees, charges, and billing arrangements that will apply, and obtain the client's agreement."

"Members shall not:

a) provide unnecessary or futile services/products where benefit or continued benefit cannot be reasonably expected. This does not preclude a member from providing a period of trial therapy or product trial to determine if benefit could occur.

b) submit a false or misleading account or charge for a service or product provided to a client."

The following documents can be found on the CSASK website under Registrant Resources, Practice Guidelines

- National Audiology Competency Profiles, CAASPR May 2018
- National Speech-Language Pathology Competency Profiles, CAASPR May 2018
- CSASK Code of Ethics
- CSASK Documentation and Record Management Guidelines
- CSASK Conflict of Interest Guidelines
- Questions to Ask Private Practitioners
- CSASK Guidelines for Supportive Personnel – SLP Assistant
- CSASK Guidelines for Supportive Personnel – Audiometric Technician

- Saskatchewan Hearing Aid Sales and Service Act