

## Notice to the Professions

### Billing: Use of Communication Health Assistants & Charitable Grants

August 17, 2019

Registrants may rely on assistants for various aspects of their practice. The College has received questions from the professions as to if and how registrants should bill these services in the context of providing client services under a grant from a charitable or non-profit organization.

Registrants' fees and billings are a market issue and subject to negotiation with their employers or clients. Registrants' must however engage in billing in a manner that is consistent with the Values and Principles of CSHBC's *Registrant Code of Ethics*, in particular:

**"Integrity:** Be truthful; behave with honour and decency while upholding the CSHHPBC professional and practice standards."

Registrants must also comply with Communication Health Assistants (Delegation & Assignment), in particular: "Registrants must be aware of the legal implications of utilizing CHAs [Communication Health Assistants]."including ... transparent billing practices that reflects whether a service is provided by a registrant or a CHA."

Registrants should first consider the contractual terms of any grant funding. These terms may restrict – or entirely eliminate – when registrants can bill for services provided by assistants. Registrants must not attempt to recover fees for assistants' services where the terms of their grant funding prohibit services by assistants or payment for such services.

Registrants must consider the following steps where the grant provider does not expressly prohibit the use of assistants:

1. Registrants should contact a grant provider directly to clarify whether assistants are eligible to receive grant funding.
2. If a grant provider does not allow a grant recipient to bill for services by an assistant, a registrant must not do so. If a grant provider allows a grant recipient to bill for services by an assistant, a registrant must engage in transparent billing practices. Registrant's billing must ensure clients and grant providers are informed of which services are provided by the registrant or an assistant.

3. Once a registrant has obtained client consent to a therapy plan which relies on assistant services, the registrant should alert a grant provider to portions of the therapy plan which they intend to delegate to assistants and how the registrant intends to bill for those services.
4. The registrant must bill their services in a manner that identifies what services an assistant provided and the rates which apply to those services.

Registrants must comply with SOP-PRAC-04 when determining whether assistants may perform clinical services.