

SP 1.0 Inappropriate/Fraudulent Billing

Approved by Council May 2004
 Revised June, 2009
 Revision Effective July 1, 2009

Purpose and Objective

Appropriate billing and accounting practices are the professional responsibility and expectation. ACAC oversight of member billing practices is a fundamental responsibility of self-governance and will be reviewed in the course of the execution of the Practice Visits process and the Complaints process.

Definition(s)

Inappropriate/fraudulent billing will comprise any action involving intentional billing anomalies; including, but not restricted to, billing for services not rendered, billing for services provided on dates other than the date actually provided, billing a principal account for service provided to another person, billing payer fees elevated from standard, billing multiple payers for a single service.

Enforceability

Penalties for the betrayal of this trust shall be severe and may include, but are not limited to, formal reprimand, fine, assessment of investigative and discipline process costs, billing restitution, conditions on practice at member’s expense (recurrent ACAC appointed billing audits, practice supervision, psychological evaluations, counseling), suspension of license, revocation of license, referral to Attorney General’s Office for criminal prosecution of fraud.

Penalty

It is the position of the ACAC that members have a professional responsibility to ensure that their billing practices and systems are appropriate, ethical and confined to the boundaries prescribed by law. Based upon the severity of the activities in question, the ACAC believes it appropriate that first time offenders in this arena generally be provided with the opportunity to remediate their behaviours. Subsequent inappropriate/fraudulent billings will be dealt with in an increasingly severe manner with an understanding that continued infractions will result in revocation of licensure.

First Time Offenders	Second Time Offenders	Third Time Offenders
<ul style="list-style-type: none"> • Letter of reprimand presented to the member by Council in person and/or • Fine and/or suspension and/or license revocation • Costs of process • Billing audit determined by Registrar • Billing restitution – agreed to by Complaints Director • Mandatory counseling 	<ul style="list-style-type: none"> • Fine and suspension and/or license revocation • Costs of process • Billing audit determined by Complaints Director • Audited restitution – agreed to by Complaints Director • Mandatory counseling 	<ul style="list-style-type: none"> • License revocation • Costs of process

