



Guidelines for Chiropractors operating as independent contractors within multi-disciplinary settings.

While the ability of teams to work together in a common setting has specific advantages to patients and practitioners, multi-disciplinary teams also present challenges to health professionals from a number of perspectives. While these challenges are not trivial in nature, with careful consideration they can be easily navigated in order to ensure that the benefits of multi-disciplinary practice are balanced with the responsibility that each regulated health professional carries to be accountable to their own practice and patients. The following guidelines should be reviewed and endorsed by both the chiropractor and the clinic owner/operator before entering into any practice relationship that involves multiple health professionals operating within a common clinic structure where a registered chiropractor is not the principal owner/operator.

Custodial responsibility for records.

The responsibility to maintain and safely store complete and accurate records relating to patient care is the responsibility of each licensed chiropractor and as cited in regulation 14. (1)

Chiropractors licensed under the Act shall demonstrate to the board, upon request, evidence of satisfactory patient record keeping practices.

(2) Patient records shall be kept in 2 categories

(a) clinical; and

(b) accounting.

In order to be in compliance with the act and regulations that govern the practice of chiropractic in NL as well as the Personal Health Information Act (PHIA), each chiropractor must maintain custody and/or control and have the ability to produce a copy of clinical records relating to the care of each patient. The responsibility for security of these records rests solely on the attending chiropractor and must accompany the chiropractor upon departure from the clinic. A chiropractor shall not be an employee of a clinic unless that clinic is owned by a chiropractor registered with the NLCB or it is a registered Professional Chiropractic Corporation (PCC)

In addition, a full and detailed copy of financial transactions related to the care of each patient must be maintained which includes but is not limited to: dates of service, services rendered, fees charged, fees collected. Within this duty to ensure that accurate financial records are maintained it is incumbent on the licensed chiropractor to regularly review financial transactions related to clinical care in order to ensure the accuracy of these records. This can be achieved in a number of ways however minimally this review process should include:

- 1) Daily review of patient day sheet including patient visits, services rendered, charges for services, and fees collected.
- 2) Weekly review of fees collected from sources other than those collected at the time of the patient visit to ensure the accuracy of payments.
- 3) Monthly reconciliation of patient visits/ fees charged/ fees collected to demonstrate the accuracy of financial records and to ensure that detection measures are in place to indicate when inaccuracies in services rendered/fees collected may be present.

In order for these records to be compliant with regulations that prevent the fee or reward for services rendered by a chiropractor from being received by a person or corporation other than one which is licensed with the NLCB, it is essential that the above documentation indicate the fee received by the licensed chiropractor as 100% of the services rendered. Charges that are incurred in the normal activities of conducting business such as rent/administrative support/ office expenses/advertising etc. should be indicated on the monthly reconciliation sheet as an expense to be deducted from the proceeds of professional services and should not exceed an amount which can reasonably be demonstrated to be associated with the direct costs of administrative expenses associated with the delivery of chiropractic services.

While payments may be collected and processed by the clinic initially, 100% of these fees should be accounted for under the responsibility of the licensed chiropractor in the monthly reconciliation sheet. Once this has been reviewed and verified to be accurate, the chiropractor may assign an amount or percentage of this fee to offset any costs incurred in the provision of patient care.

Where a chiropractor is engaged in practice within a clinical setting where personal health information is collected, generated, or stored in a manner in which it is accessible to a person other than the chiropractor (such as staff responsible for preparing files, billing and payment reconciliation), or is stored on an electronic platform for which the chiropractor does not act as the principle administrator, the chiropractor will ensure that an information management agreement exists to set forth policies and procedures around information security and access.

If the Board has reasonable grounds to believe that a chiropractor or a clinic where chiropractic services are provided is not compliant with the duty to ensure the accuracy of financial transactions related to the services rendered by the chiropractor, or is otherwise engaged in practices which are contrary this guideline or any other applicable legislation, the Board may request access to the financial records of the chiropractor or any agreements that relate to the

provision of chiropractic services which are to be provided within (7) seven days of the corresponding request. The board may also require the chiropractor to authorize other parties to release information relating to this request that may materially affect the ability of the board to conduct an investigation. This may include but is not limited to the financial records of the clinic in which the chiropractor provides clinical services.