



OHIP Payments for Delegated Procedures

Quick Reference Guide

Economics, Policy & Research

OHIP Payments for Delegated Procedures Quick Reference Guide¹

The purpose of this reference guide is to provide a general overview on the payment rules for billing OHIP a procedure delegated to a non-physician. The OHIP Schedule of Benefits² (the “Schedule”) lays out the payment rules in the General Preamble under the section heading *Delegated Procedure*.

The guide contains the following sections:

- (A) Who can be a delegate?
- (B) What services can be delegated and paid by OHIP?
- (C) Where and when can a procedure be delegated?

Please note that the information contained in this guide surrounding the delegation of a procedure is strictly for OHIP payment purposes.

A: Who can be a delegate?

The delegate may be any non-physician (e.g., physician assistant, nurse, nurse practitioner, etc.) who is properly trained to perform the procedure and where the procedure is one which is generally and historically accepted as a procedure, which may be carried out by the medical assistant.

For the delegated procedure to be eligible for payment by OHIP, the delegate **must be** employed by the physician. Employed means that there is an employment contract between the physician and the individual and Canada Revenue Agency receives income statements for tax purposes. As such, delegated procedures provided by an individual who is employed by a facility or organization such as a public hospital, public health unit, industrial clinics, long-term care facilities or Family Health Teams are not eligible for payment by OHIP.

B: What services can be delegated and paid by OHIP?

The OHIP Schedule allows a physician to bill OHIP for delegating a procedure that is generally and historically accepted as a procedure that could be performed by a non-physician under the supervision of a physician.

Physician services, such as assessments, counselling, therapy, consultations and diagnostic service interpretations cannot be delegated to a non-physician for OHIP payment purposes. These services must be personally rendered by the physician to be paid by OHIP.

¹ **Disclaimer:** Every effort has been made to ensure that the contents of this Guide are accurate. Members should, however, be aware that the laws, regulations and other agreements may change over time. The Ontario Medical Association assumes no responsibility for any discrepancies or differences of interpretation of applicable Regulations with the Government of Ontario including but not limited to the Ministry of Health (MOH), and the College of Physicians and Surgeons of Ontario (CPSO). Members are advised that the ultimate authority in matters of interpretation and payment of insured services (as well as determination of what constitutes an uninsured service) are in the purview of the government. Members are advised to request updated billing information and interpretations – in writing – by contacting their regional OHIP office.

² OHIP Schedule of Benefits, Physician Services, March 19, 2020 (effective April 1, 2020) (<http://www.health.gov.on.ca/en/pro/programs/ohip/sob/>).

C: Where and when can a procedure be delegated?

For a delegated procedure to be eligible for payment, the procedure must be rendered in the physician's office or clinic. Furthermore, the physician must be physically present to ensure that the procedure is performed correctly and must be immediately available to intervene where need be.

There are procedures that do not require the physician to be present (see below exclusion list). For these procedures, in addition to the criteria above the following would also need to be met:

1. The delegate is properly trained to perform the procedure and the procedure is rendered in accordance with accepted professional standards and practice;
2. The procedure is carried out on his or her own patient; and
3. The service must be documented in the patient's chart (same medical record requirements apply) noting that the procedure was rendered by the delegate.

Exclusion list of procedures that do not require the physician to be present:

Common Procedural Description	Applicable Fee codes
Venipuncture	G480, G482, G489
Injections and immunizations	G372, G373, G538, G590, G840, G841, G842, G843, G844, G845, G846, G847, G848
Ultraviolet light therapy	G470
Administration of oral polio vaccine	G462
Simple office laboratory procedures	G001, G002, G004, G005, G009, G010, G011, G012, G014, G481
Ear syringing, curetting or debridement	G420
B.C.G. inoculation	G369
Simple Spirometry and Flow Volume Loop	J301, J324, J304, J327
Casts	Z198-Z209, Z211, Z213, Z216, Z873

Summary points to bill OHIP for delegated procedures

- Physician services, such as assessments, counselling, therapy, consultations and diagnostic service interpretations cannot be delegated to a non-physician for OHIP payment purposes.
- The delegate is employed by the physician
- The procedure is performed in the physician's office or clinic with the physician present and is able to immediately intervene (except for those procedures included in the exclusion list)
- The procedure is generally and historically accepted as a procedure that could be performed by a non-physician under the supervision of a physician.
- For procedures that do not require the physician to be present (included in the exclusion list) then in addition to the criteria above the following would also need to be met:
 - The delegate is properly trained to perform the procedure and is rendered in accordance with accepted professional standards and practice;

- The procedure is carried out on his or her own patient; and
- The service must be document in the patient’s chart (same medical record requirements apply) noting that the procedure was rendered by the delegate.

For additional details on OHIP payment rules regarding delegated procedures, please see:

1. OHIP Schedule of Benefits, General Preamble on Delegate Procedures:
<http://www.health.gov.on.ca/en/pro/programs/ohip/sob/>
2. EPC Education Bulletin Vol. 9, No. 1, *Payment Requirements for Delegated Services*:
https://www.oma.org/wp-content/uploads/09011epc_bulletin.pdf
3. CPSO Policy #5-12, *Delegation of Controlled Acts*: <https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Delegation-of-Controlled-Acts>

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