

# Release of Information agreement: FAQs

## Is the Release of Information form a requirement?

Although not a requirement, it is highly recommended doctors also complete the Release of Information form in conjunction with the Assignment of Payment form to allow both the physician and payee request access through HIBC for the same billing records/remittances.

## What is a MSP billing number?

A billing number consists of two numbers: A practitioner number and a payment number. The practitioner number identifies the practitioner performing and taking responsibility for the service. The payment number identifies the person or party to whom payment will be directed by the Medical Services Plan (MSP). Each claim submitted must include both a practitioner number and payment number.

## What are the requirements for physician's MSP billing number/Assignment of Payment?

MSP billing number: The physician who provided the insured service must bill for the services under their own practitioner number.

- [Medical Services Plan \(MSP\) Enrolled Physicians](#)
- Requirements, refer to [General Preamble C.7](#) to the [Doctors of BC Guide to Fees/MSD Payment Schedule](#)

Group practice, partnerships, and locum tenens: Requirements, refer to [General Preamble C.8](#) to the [Doctors of BC Guide to Fees/MSD Payment Schedule](#).

Assignment of Payment: An Assignment of Payment is a legal agreement by which an attending practitioner designates payment for their services to another party. Requirements pertaining to assignment of payment, refer to [General Preamble C.9](#) to the [Doctors of BC Guide to Fees/MSD Payment Schedule](#) which summarizes the requirements in the [Medicare Protection Act](#).

## What are the different types of payment assignments when working in a group practice, partnership, or locum arrangement?

It is against the [Medicare Protection Act](#) to bill under another physicians' MSP number for a service that you provided. Refer to the relevant payment schedule and MSP claims policy and procedures. Below are three types of payment assignments:

1. Locum tenens: When one practitioner replaces another during holidays or sickness, payment may be made to either. The assignment must be limited to a specific period of coverage. To apply, complete an [Application for Assignment of Payment form](#).
2. Clinic or associated group: Practitioners may assign payment to a clinic or group practice. The clinic or group normally have a single payment number. The term of assignment may be for any period up to five years. The term can be extended, but new assignment forms must be submitted prior to the expiry of the current term. Fill out an [Application for Assignment of Payment form](#) to apply.
3. Diagnostic facility or hospital: This allows practitioners to assign payment to a diagnostic facility or hospital for specific services such as EMG, laboratory medicine, nuclear medicine, pulmonary function studies, radiology, and ultrasound. This term of assignment may not exceed two years. Complete an [Assignment of MSP Payments for Diagnostic Facility Services form](#) to apply.

A physician may choose not to complete an Assignment of Payment form and may opt to bill under their own MSP payment number and remit a percentage of their total earnings, as per their agreement. However, this must be agreed upon between both parties (the physician) and (the payee). The physician must also have an EMR billing software and/or billing company to consider this as an option.

If you have questions before entering into a locum agreement, Doctors of BC has a list of preferred legal firms under [Club MD](#) with reduced rates that can provide contract advice between physicians.

## What are the risks for non-compliance?

- Billing under any other physicians' MSP number other than your own will contravene the requirements pertaining to the [General Preamble](#) (C. 7, C. 8, and C. 9) to the [Doctors of BC Guide to Fees/MSD Payment Schedule](#) which summarizes the requirements set out in the [Medicare Protection Act](#).
- It will impact the level of benefits that the physician is entitled to from [Doctors of BC](#) at the end of the year, such as [Canadian Medical Protective Association \(CMPA\)](#), [Continuing Medical Education \(CME\) Fund](#), [Contributory Professional Retirement Savings Plan \(CPRSP\)](#), [Rural Education Action Plan \(REAP\)](#), and [Community Longitudinal Family Physician Payment \(CLFP\)](#).
- During an [MSP billing audit](#), if it is discovered that services provided by a physician were billed under another physicians' MSP number, you may be responsible for paying back funds.
  - [Audit tip: Locum agreements](#) | British Columbia Medical Journal.
  - There may also be [CMPA](#) medical-legal implications if a physician were to bill for services they provided under another physician's MSP number.