



### **USE OF PRACTICE CODE NUMBERS BY PROVIDER**

NAMAF is a juristic body established in terms of the Medical Aid Funds Act, 1995 (Act No. 23 of 1995) to control, promote, encourage and co-ordinate the establishment, development and functioning of Medical Aid Funds in Namibia.

Section 44 of the Medical Aid Funds Act makes provision for the line Minister to, after consultation with NAMAF, make Regulations relating to all matters, which the Minister considers necessary or expedient to prescribe in order that the objects and purposes of this Act may be achieved.

Regulation 5 (1) of the Regulations made in terms of the Medical Aids Funds Act (Govt. Notice No. 12 of 1997) provides that ***“Any supplier of medical services may apply to NAMAF for the allocation of a practice number for the purpose of the identification of his or her practice in claims submitted to registered funds and for the proper administration and processing of such claims by registered funds”*** while Regulation 5 (2) provides that such a practice number application ***“shall comply with such requirements as NAMAF may determine”***.

There have been several problems with providers abusing the Practice Numbers that has been issued to them. In order to prevent abuses and misuses and to ensure that providers use their numbers correctly and in keeping with the provision of the above quoted regulations the following rules shall apply. Any deviation from the laid-out rules constitute a punishable offence under these guidelines/regulations.

**RULE 1:** All Healthcare Providers / Suppliers of Medical Services, be it in their capacities of an owner, employee, *locum tenens* or visiting healthcare practitioner, who wish to have their professional work / services to be paid for directly by the registered medical aid funds must obtain a Practice Number from NAMAF for the purpose of identification and tracking of the claim patterns and profiles of healthcare providers.

An exception to the rule would be:

1.1 Nursing staff employed by a facility, where their services forms an integral part of the services offered by such a facility such as accommodation, theatre services and nursing care to mention but a few.

**RULE 2:** Practice numbers will not be issued to interns.

**RULE 3:** All the claims in respect of services rendered by healthcare providers/ supplier of medical services to members of medical aid funds must be submitted in the name of the healthcare provider / supplier of medical services who rendered such service using his/her practice number for identification.

**RULE 4:** In all the cases where a Healthcare provider / Supplier of Medical Services is practicing as *solus* alone

at his/her facility one practice number will be sufficient for the purpose of these guidelines.

- RULE 5:** In all other instances where a healthcare provider or supplier of medical services is practising from more than one facility each facility from whence such service is rendered must obtain a practice number for the identification of the location where such service is rendered.
- RULE 6:** In all other instances where a healthcare provider or supplier of medical services is practising with other healthcare providers/suppliers of medical services at the same facility every healthcare provider /supplier of medical services working in such a group must obtain an individual practice number for the identification of his/her work and/or service he/she rendered.
- RULE 7:** A letter confirming that a healthcare provider / supplier of health services is employed must be provided upon application for a practice number by his /her employer.
- RULE 8:** The bank account must be in the name of the practice / facility which has been registered and recognised by NAMAFA, should they wish to submit claims for services provided in one account.
- RULE 9:** All healthcare practitioners must provide a certificate of good standing from the Receiver of Revenue.
- RULE 10:** In the case of Ambulance Services, Laboratories and Radiology Practices, the following will apply:
- a) The organisation must apply for a practice number. This practice number will be for the identification of the bank account to which claims must be reimbursed.
  - b) Each branch / facility / base station must apply for a practice number to identify where the service originated.
  - c) Each Pathologist, Laboratory Technologist, Radiologist, Radiographer and all Ambulance personnel rendering a service to a patient must apply for a practice number. This will be for the identification of the healthcare practitioner who provided the treatment / service.
- RULE 11:** NAMAFA will register a maximum of TWO facility addresses per healthcare practitioner. The facilities must be geographically located within a reasonable distance from each other to ensure that the provider can give adequate cover to both facilities. The healthcare provider must be able to demonstrate how this will be possible.
- RULE 12:** In exceptional circumstances, NAMAFA may register an additional facility where the practitioner is servicing a rural centre or growth point during week-ends.
- RULE 13:** Where a healthcare provider who is in fulltime employment of any Institution, wishes to engage in limited private practice such provider will only be granted ONE facility in the town, city where the healthcare practitioner is employed. Such healthcare provider must provide proof of permission, issued by his/her main employer to practice at another facility or Institution.
- All foreign healthcare providers with conditional work permits linking them to specific facilities must provide:
- I. HPCNA registration certificate and exemption granted by HPCNA to practice at another facility.

- II. A copy of their employment contract to enable NAMAFA to eliminate any possibilities of issues that could bring about a manifestation of pervasive incentives.

**RULE 14:**

- a) A provider who regularly uses *locum tenens* to run his/her facility must submit to NAMAFA the full name of such *locum tenens* and a copy of:
  - I. A letter explaining why the provider requires the continued use of the *locum tenens* to run the facility,
  - II. Practice number of the *locum tenens*,
- b) If the registered provider is not running the facility personally, NAMAFA may impose a time limit on the arrangement and retain the power to cancel the practice number of such a facility.
- c) Healthcare Providers will only be allowed to use *locum tenens* who are in the same profession / scope of practice / discipline of the employing healthcare provider.

**RULE 15:**

- a) A healthcare provider will be granted a practice number to practice in accordance with his / her work permit issued by the Ministry of Home Affairs. Thus, a healthcare provider will not be granted a practice number to practice independently if a limited / restricted work permit has been granted.
- b) Practice numbers issued to healthcare providers holding a work permit will only be valid up to the expiry date of such work permit. Proof to be provided to NAMAFA of extension / renewal granted by Ministry of Home Affairs

**RULE 16:**

- a) If a provider dies, emigrates or ceases to practice for any reason, his/her Practice Number automatically lapses, although services already provided will be honoured. NAMAFA may, in special circumstances, permit the continued use of the facility Practice Number for a limited period. NAMAFA should be informed immediately of such circumstances, should the practice find itself in such a situation and wishes to continue with the use of the practice number.
- b) NAMAFA will not grant permission for the continued use of the individual practice number of the healthcare provider who have died.
- c) The practice number of the healthcare practitioner who died will lapse on the date of death as indicated on the death certificate.

**RULE 17:** No provider shall use another provider's individual practice number, not even as *locum tenens*.

**RULE 18:** Solus practice numbers cannot be converted into a facility number.

**RULE 19:** Practice Numbers are not transferrable from one healthcare provider / facility to another.

**RULE 20:** Requests to backdate or alter the original starting date of the practice number shall not be accommodated.

**RULE 21:** Practice numbers will only be valid from the date on which the Information sheet confirming the practice number has been issued to the Healthcare Provider.

- RULE 22:** Requests for multi-disciplinary practice numbers will only be entertained where clinical justification is provided for approval by the Management Committee of NAMAF.
- RULE 23:** It is mandatory that all facilities used by healthcare providers be registered in terms of Hospitals and Health Facilities Act 36 of 1994 with the Ministry of Health and Social Services and that proof of such registration must be provided.
- RULE 24:** No practice number will be issued to a healthcare provider who does not have a scope of practice already determined by the HPCNA.
- RULE 25:** It is compulsory for all Healthcare providers to renew their Practice Numbers annually between January and March.
- a) Pro-ration of renewal fees payable for the next year will be calculated from the month in which the practice number was issued to the provider.
  - b) Healthcare providers who fail to renew their Practice Number will have their Practice Numbers suspended by the last working day of April.
  - c) A Healthcare provider who fails to re-instate his/her Practice Numbers within 3 months of suspension will cause his/her number to be deactivated. In this instance a healthcare provider who wishes to reinstate a deactivated Practice Number will be required to lodge a new application.
  - d) The re-instatement of practice numbers will only be affected once NAMAF received payment of prescribed fees.
  - e) Re-instated practice numbers will only be effective from the date on which the Information sheet confirming that the suspension has been lifted is issued to the Healthcare Provider. Claims in respect with services rendered by a Healthcare Provider or Supplier of Medical services during the period such providers/supplier's Practice Number was suspended will not be recognised and thus not be honoured by medical aid funds.
  - f) Healthcare Providers must inform NAMAF three (3) months in advance should such healthcare provider chooses to stop practicing and/or delivering professional services to enable NAMAF to de-activate such providers' practice number.
- RULE 26:** One of the conditions for the use of the Practice number, is that split-billing is not allowed and the healthcare provider must provide a full account to the member and the Medical Aid Fund they belong to. In terms of the Medical and Dental Act 10 of 2004, sub-section2:
- a) Every healthcare provider, before rendering any professional services, unless the circumstances render it impossible for him / her to do so, must provide a quotation to the member / patient, of the fees which he / she intends to charge,
  - b) Every healthcare provider must submit to the patient / member a detailed account relating to such professional services rendered, which must indicate the full amounts charged and all items used during the consultation / procedure / service rendered, does not matter whether such amount is to be paid by the patient as additional payment or by the medical aid fund.

## **SCHEDULE OF PUNISHMENTS FOR ABUSE, MISUSE, FRAUD AND WASTE**

**ALL** registered service providers are required to comply with the rules governing the Practice Code Numbers. Once non-compliance, wastage, misuse or fraud has been detected, payment to the healthcare provider may be suspended and all irregular payments recovered. The service provider/provider may be suspended from direct payment for a period of time or the Practice Code Number may be totally withdrawn, and the punishment will be applied collectively by all NAMA F members, depending on the severity of the offense.

Below is a schedule of applicable punishments for offenders

### **1. First time Offenders**

<b><u>Monetary value associated with the transgression</u></b>	<b><u>Punishment</u></b>
N\$1.00 to N\$10 000.00	suspension period 3 months
N\$10 001.00 to N\$100 000.00	suspension period 6 months
N\$100 001.00 to N\$500 000.00	suspension period 12 months
N\$500 000.00 and above	life suspension

### **2. Second Time Offender**

N\$ 1.00 to N\$ 10 000.00	2 years suspension, regardless of the Amount
N\$10 001.00 and above	life suspension

### **3. Third Time Offender**

Lifetime suspension, regardless of the amount

4. If a healthcare provider has been convicted of fraud or there is sufficient evidence provided to NAMA F by a member Fund, all NAMA F members will be in a position to impose blanket sanctions to suspend direct payments to such a healthcare provider while waiting for the outcome of due legal process.
5. If it is obvious that the service provider and the member of a Fund connived to defraud a Medical Aid Fund, then both will be suspended.
6. In any event where there is a dispute between a Healthcare Provider / Supplier of Medical Services and NAMA F the parties will agree to jointly appoint an arbitrator, unless:

- a) The healthcare provider indicated that there is no need for a tribunal as it may cause further delays in the finalisation of the of the enquiry and;
  - b) that NAMAFA has the authority to impose any penalties in respect of the transgressions of the rules regulating the utilisation of the practice number issued to him / herself and;
  - c) that the healthcare provider will subject him / herself to the decision of NAMAFA and;
  - d) that the healthcare practitioner undertakes not to misuse the practice number issued in respect of his / her surgery / practice than those it was legitimately issued for and,
  - e) upon the healthcare provider has signed an agreement with NAMAFA confirming such agreement and decision taken.
7. If a healthcare provider has been convicted / suspended by the HPCNA for the transgression of the ethical rules, NAMAFA will suspend the practice number for the duration as determined by the HPCNA.