



# THE PROVIDER ADVANTAGE PROGRAMME GUIDE

FEBRUARY 2019

# Health Service Provider Registration Guide

**Contact us:**

If you would like any further information about the Bermuda Health Council, or if you would like to bring a healthcare matter to our attention, we look forward to hearing from you.

**Mailing Address:**

PO Box HM 3381  
Hamilton HM PX  
Bermuda

**Street Address:**

Sterling House, 3rd Floor  
16 Wesley Street  
Hamilton HM11  
Bermuda

**Phone:** 292-6420

**Fax:** 292-8067

**Email:** [healthcouncil@bhec.bm](mailto:healthcouncil@bhec.bm)

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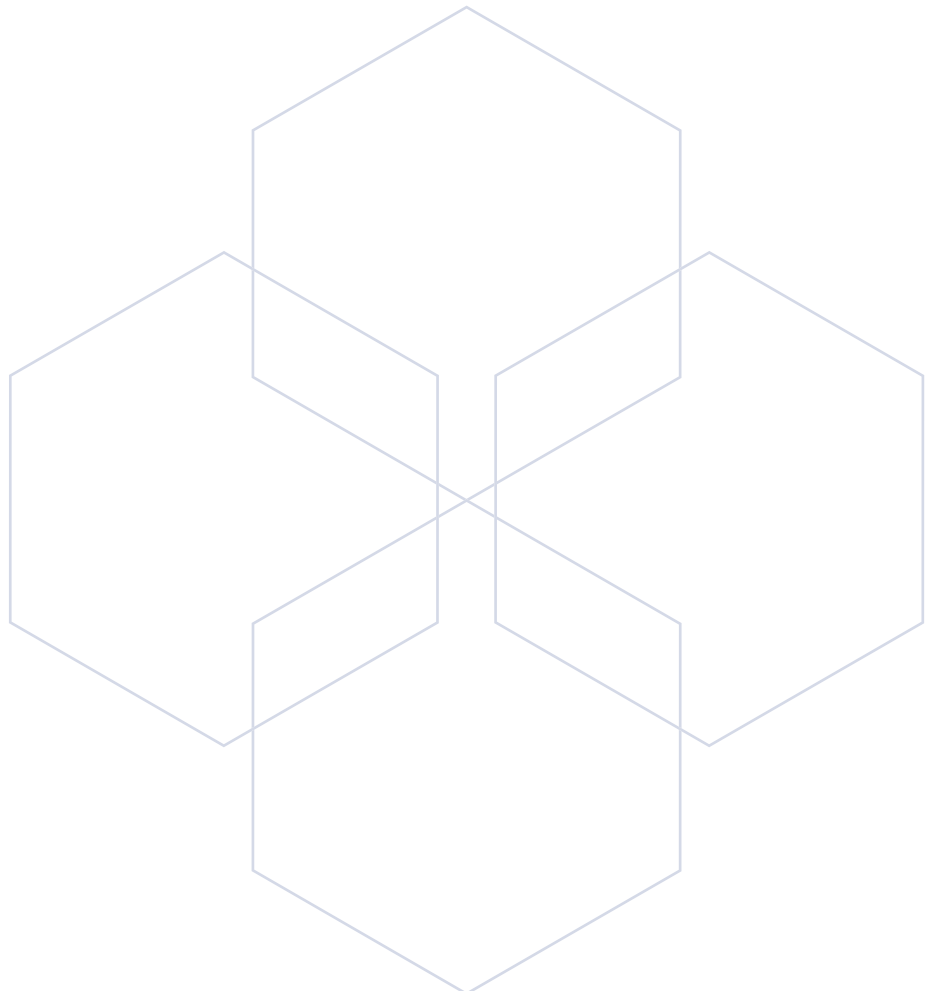
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## A. PURPOSE

This document provides guidance on 1) the application process for the Provider Advantage Programme with the Bermuda Health Council, and 2) the process for applicants to update facility or staffing information.

## B. DEFINITIONS

**Bermuda Health Council:** is used to refer to the Board and Secretariat combined. It may also be referred to as the Bermuda Health Council or Health Council.

**Board:** Refers to the ordinary, and ex-officio members of the Council appointed by the Minister of Health in accordance with the Bermuda Health Council Act 2004.

**Health Professional:** A person who is registered to practice his, or her health profession by the relevant regulatory authority, or statutory body.

**Health Service Provider:** Any person, group of persons, or organization that operates a business offering health services to the public. Health services include: hospital, medical, dental, and professional services related to health. This definition excludes any person who is an employee under a contract of service.

**Registration:** The act of making a list, catalogue, or register, particularly of an official nature, or of making entries therein. In the context of this document, the Provider Advantage Programme pertains to voluntary registration; which is a list of health service providers posted on the Bermuda Health Council's website.

**Secretariat:** Refers to the employed staff of the Bermuda Health Council, including the Chief Executive Officer.

**Statutory Body:** A body created by statute (i.e. act of Parliament) with specific duties related to health professionals.

## C. PROGRAMME OBJECTIVE

The Health Council's Provider Advantage Programme is the only comprehensive repository of health services in Bermuda, as described by the providers themselves. It currently has 323 registered facilities, which accounts for more than 80% of the estimated health facilities on island.

The online register enables insured persons to have appropriate choice of providers. It also lets the Council, and other health system partners know what services and professionals are on island.

Registration is not mandated by legislation, thus it is voluntary in nature. Participation in the Council's Provider Advantage Programme is required by some health system partners as insurers, and other payer, have the ability to set their own reimbursement criteria.

The Health Council's Provider Advantage Programme does not replace a health professional's requirement for individual registration with their governing statutory body. More implicitly, the Council does not register individual health professionals. The Health Council's Provider Advantage Programme is specific to Health Service Providers (i.e. facilities, organizations, businesses etc.).

## D. HEALTH COUNCIL FUNCTIONS

The Provider Advantage Programme's register of health service providers gives vital information for health system planning and the delivery of certain Health Council functions, namely:

- 5(a) ensuring the provision of essential health services
- 5(b) ensuring that health services are provided to the highest standards

**Note:** *functions taken from the Bermuda Health Council Act 2004.*

To do so, the Health Council partners with the relevant statutory bodies to audit on professional registration (e.g. the Bermuda Medical Council, or the Bermuda Dental Board), and with the relevant government departments for facility maintenance and equipment monitoring (e.g. Department of Public Health).

## E. BACKGROUND

The Health Council has designed the Provider Advantage Programme to support health service providers, and increase awareness of effective clinical practice standards. In addition, registration allows for the promotion of safe clinical practice environments, aids in health system planning, encourages ethical behaviors, and protects patient rights and care.

The Health Council does not govern the clinical practices of regulated health professionals. Regulated health professionals are registered by the statutory bodies charged with overseeing a profession. Registration of health professionals usually involves checking a health professional's training and qualifications, and the applicant's agreement to adhere to the established standards of practice for the profession. For information about the registration of health professionals, visit our professional bodies' page at: [www.bhec.bm/professional-bodies](http://www.bhec.bm/professional-bodies).



## F. ELIGIBILITY

All health service providers, are eligible for the Provider Advantage Programme; including providers who are already regulated by the Ministry of Health, like pharmacies and hospitals, or have overseas accreditation, like clinical laboratories. Health service providers who have chosen to register with the Health Council will have their facilities listed on the Council's website. Other benefits may include: 1) recommendations for insurer reimbursement, 2) standard health benefit (SHB) eligibility, 3) Health Council workshops and training, and 4) invitations to collaboration and health system round table meetings.

Provision for the registration of non-regulated health professionals, operating within a health service provider, have been made. These professionals will have to meet a number of additional requirements to be eligible for registration. These requirements are included in section (G) of this guide.

## G. APPLICATION PROCESS

The registration process requires the completion of an application form. This digital form is available on the Health Council website, and requests the following information:

- Demographic and facility information
- Identifying information of the business owner(s)
- Medical director information and qualifications
- Declaration of financial interests
- Attestation statement indicating the validity of the information provided

**Note:** *The following information may be verified with the appropriate external agencies based on information provided in the application.*

- Current compliance with all legal requirements for a business operating in Bermuda (e.g. up-to-date social insurance, health insurance, payroll tax payments, contributory pension, immigration eligibility, etc.)
- Compliance with any regulatory obligations set by the Government of Bermuda and the Ministry of Health
- Active and unconditional professional registration with the relevant statutory body, and full compliance with relevant Standards of Practice for all health professionals providing the proposed benefit

All applicants must complete and digitally submit the three supplemental excel documents in tandem with a completed application. The excel sheets are listed below, and are available on the Health Council's website, [here](#).

**Medical Equipment List** - all non-consumable durable technologies or devices integral to the diagnosis and provision of health services. (e.g. Lasers, X-rays, EKG machines, etc.)

**Professional Staff List** – all regulated and non-regulated staff members directly involved in the provision of health services (e.g. nurses, aids, technologist, etc.). This excludes non-clinical support staff (e.g. accountants, office managers, receptionists, etc.)

**Service List** - all health services provided by the facility and the corresponding CPT codes used to claim reimbursement from insurers.

All non-regulated health professionals are expected to submit a copy of the following documents:

- Diploma/Certificate
- Professional Licensure (both local and international, if appropriate)

The above supplemental documentation is to be submitted to the [healthcouncil@bhec.bm](mailto:healthcouncil@bhec.bm). Each document submitted must have a filename formatted as follows for ease of access;

**Facility Forms/Certificates** - <Facility Name> - <Document Type> (e.g. Calm Care - Equipment List)

**Staff Certificates/Documents** - <Facility Name> - <Provider Full Name> - <Document Type> (e.g. Calm Care - Joe Doe – Diploma)

When registering health service providers, the Health Council may request reports from external agencies, to verify the submitted information. Select government agencies provide inspection reports, and the professional boards (in some cases associations) supply the names of the registered health professionals. The Council may also verify the following documents with the Office of the Chief Medical Officer before granting registration:

- Pharmacies - MOH registration certificate & proof of inspection
- Clinical laboratories - CMO registration certificate & facility accreditation certificate
- Diagnostic Imaging Facility – MOH Certificate of Registration & Biomedical Equipment License

Finally, the Health Council relies on the self-reporting actions of Health Service Providers, whose ethical conduct is guided by their Standards of Practice.

**Note:** *All documents sent to the Health Council are received with the expectation of confidential handling as prescribed under the Bermuda Health Council Act.*



## H. APPLICATION REVIEW PROCESS

The application form, and supplemental information will be reviewed for completeness, and the details provided will be checked with the appropriate external agencies. Incomplete applications will not be considered.

Registration with the Health Council will be for a **two year** period, with the next re-registration cycle commencing in **November 2020**. The Health Council, however, will accept applications from unregistered health service providers at any time.

Should the Health Council choose to deny an application, it will notify the applicant in writing. The provider will then be given an opportunity to review and appeal the decision. The health service provider is under no obligation to halt their operations, but the Health Council is obligated to ensure that the public and other health system stakeholder are aware of the lack of registration.

Denial of registration can in some cases effect the willingness of insurers to reimburse non-registered health service providers. However, all health service providers, both registered and non-registered, must comply with the Health Insurance (Health Service Providers and Insurers) (Claims) Regulations 2012. Specifically, Section 3.1(a) which states: a health service provider must not require the person to pay the insured portion of a procedure.

The Health Council may attach conditions, or recommendations to a registration. These recommendations will be communicated directly to a Health Service Provider. The recommendations of the Council may include, but are not limited to the following:

- Type of services based on scope of training
- Particular procedures
- Disposal of equipment, or hazardous products

The health service provider may appeal the conditions. Appeals will be discussed more fully in section (L) of this guide, however, a link to the policy may be found [here](#). During the appeal process, the health service provider will be issued a certificate that reflects the current conditions, and will be expected to comply with the expressed conditions and recommendations to maintain their registration until the appeal has been resolved.

## I. LEVELS OF REGISTRATION

In response to a number of health system concerns, the Health Council will be offering multi-tiered registration during this registration period. The levels of registration will reflect a health service provider's willingness to provide documentation concerning the safety and effectiveness of their services. Health service providers will be consulted periodically to assess the usefulness, ease of compliance, and possible additions to the tiered system.

- **Basic:** A facility that is registered with the Health Council. This registration does not reflect the effectiveness or safety of the facility’s services. Health service providers may receive Basic registration by completing the application form, and the required supplemental documentation.
- **Advanced:** A facility that is registered with the Health Council, and is accredited or certified by an external body. Or, the health service provider may complete the Council’s [Annual Self-Assessment Form](#). This self-assessment has been developed in collaboration with various health professions, and is designed to be as unintrusive as possible. However, please note, the answers submitted to the Council on the Self-Assessment Form may be subject to verification or audit. Advanced registered facilities have the Health Council’s “no objection” to operate. The Health Council encourages insurers to reimburse such companies as they have a way to demonstrate quality.
- **Premier:** A facility that is registered with the Health Council, has outcome data return obligations, and is accredited by an external body or willing to participate in the Health Council’s voluntary assessment program. Facilities with Premier registration: will be considered the preferred candidates for SHB, and will have a suggested reimbursement premium. Premier registration carries with it the Bermuda Health Council’s “Seal of Excellence”. This entitles registrants to participate in Council roundtables, consultation meetings, and workshops from the Council at a reduced rate. These health service providers will be recommended to the community as centers of excellence and featured in the Council’s newsletter; highlighting the innovations and quality standards they employ when providing care. Currently, the Premier level of registration is underdevelopment and will be implemented at a later date.

The table below further outlines the proposed registration structure:

	Council Website	Certificate	Council Inspection	Recommended Reimbursement	Eligible for SHB	Seal of Excellence
Basic	✓*	✗	✗	✗	✗	✗
Advanced	✓	✓	✗**	✓	✗	✗
Premier	✓	✓	✓	✓***	✓	✓

\* Very limited exposure on the Council’s website

\*\*The Council may request the external agency’s inspection report, or conduct periodic audits

\*\*\*The Council will advocate for Premier HSPs to be paid at a premium

When applying for registration, please indicate the level of registration the facility is seeking, and be sure to review the requirements as listed on the Council website for each level of registration. Premier registration, may be unavailable for some services for a number of reasons (e.g. no external accrediting body, the voluntary assessment process is not available, etc.). Health service providers seeking Premier registration are encouraged to contact the Health Council in writing to facilitate an accommodation.

## J. CHANGES OF STAFF & INFORMATION

To be compliant with the requirements for the Provider Advantage Programme, health service providers are to contact the Health Council promptly if there is:

- a change in **Registered or Non-Registered Professional Staff** (*all staff providing care*)
- a change in **Service**

Health service providers are invited to update the Health Council annually on:

- a change in **Provider Location**
- a change in **Facility Ownership**
- a change in **Equipment**

**Note:** *A detailed description of the equipment types, staff, and services relevant for reporting can be found on each reporting form.*

In the case of a change in ownership or facility information, health service providers are requested to complete the Change in Ownership Reporting Form found digitally on the Health Council website. Any changes in equipment, services, or staffing can be made by updating and resubmitting the appropriate excel reporting form, also available for download on the Health Council website. New non-regulated staff members, providing care, are expected to provide a copy of their qualifications and license (if applicable) to the Health Council in tandem with the updated staff excel form. All documents are to be submitted to [healthcouncil@bhec.bm](mailto:healthcouncil@bhec.bm).

Once the appropriate forms have been completed and submitted, the Health Council Secretariat will review the documents for completeness. The demographic information will be updated on the Health Council website, and Advance/Premier registered health service providers will be issued a certificate.

## K. REGISTRATION REMOVAL PROCESS

The Health Council may downgrade, suspend, or revoke its registration from a health service provider if it finds that a provider is operating in a way that compromises patient safety, or limits a patient's access to care.

### Causes for Action

There must be evidence that:

- The professional(s) are not fit and proper
- Operating outside of a professional's Scope of Practice
- Breaching of a professional's Standards of Practice
- Placing a patient in danger of avoidable harm
- Non-compliance with written recommendations for registration
- Intentional incorrect or fraudulent reports to the Health Council
- Insurance and claims fraud

As registration is a voluntary process, the cancellation or suspension of a health service provider does not revoke the right of the facility or individual professional(s) to provide services. However, the Health Council has a duty to inform health system stakeholders and the general public of a facilities registration status.

### Removal Process

1. The Health Council is made aware of a **Cause for Action**.
2. The Health Council contacts the health service provider to determine whether steps have been taken to become compliant.
3. If no evidence is provided that the provider is in compliance, the Health Council will issue a warning letter to the health service provider.
4. The Health Council will give the health service provider **7 days** to provide proof of compliance.
5. If no evidence is provided, the Health Council will notify the health service provider, in writing, of its intention to revoke their registration.
6. The suspended provider's certificate must be returned to the Health Council and a notice of the cancellation will be posted to the Health Council's website.
7. Health service providers have the right to appeal the Health Council's decision to remove their facility from the registry.

## L. APPEAL PROCESS

Applicants may appeal a decision to revoke a health service provider's registration by writing to the Health Council. The request must be given within **21 working days** from the date that the decision was given, by the Secretariat, to the applicant. Appeals may be made for one of the following reasons:

- The Health Council did not have jurisdiction to make a determination on the matter
- The decision is contrary to other Health Council policies or legislation
- Material facts and information could not be (or were not) submitted at the initial time of deliberation
- The weight of the submitted evidence does not support the outcome
- Circumstances related to the initial decision have significantly changed

All appeals must be made in writing, signed and addressed to the Chief Executive Officer of the Health Council within **twenty-one (21) days** of the date on which the written position of the Health Council was issued. The request should include whether the appellant wishes to present in person during the appeals process. The appellant must fully complete the Appeals Form then submit the document and accompanying information in person, by courier, or via email to [healthcouncil@bhec.bm](mailto:healthcouncil@bhec.bm). The form can be retrieved from the Health Council. An Appeals Panel will then be created to adjudicate the matter.

The Health Council has a detailed description of the appeals policy posted on its website. For additional guidance please refer to that [policy](#).

## M. CONCLUSION

Through this system of registration, the Council endeavors to ensure that Health Service Providers deliver good quality care that meets the needs of the people. For additional information about the Bermuda Health Council's role, and its activities in the health system, please access our website: [BHeC.bm](http://BHeC.bm), or contact us via our social media: [Facebook](#) & [Instagram](#).

The following reading materials are suggested by the Health Council. They outline the Council's latest efforts to improve the quality of Bermuda's health services:

1. [2018 Order Rates Report](#)
2. [2018 National Health Accounts](#)
3. [2017/2018 Annual Report](#)
4. [2017 Statutory Boards Self-Assessment Report](#)