

# REQUIREMENTS FOR ALLOCATION AND UTILIZATION OF PRACTICE CODE NUMBERS MADE UNDER THE MEDICAL AID FUNDS ACT, 1995 (ACT NO. 23 OF 1995)

The Namibia Association of Medical Aid Funds has under Regulation 5 (2) of the Regulations made in of the Medical Aid Funds Act, 1995 (Act No. 23 of 1995), determined the requirements for application and allocation of a practice number as contemplated in Regulations 5 (1) thereof.

Dr Lea Namoloh

President

Windhoek

01 December

2022



"Over-servicing" means the supply, provision, administration, use or prescribing treatment or care (including diagnostic and other testing, medicine, and medical devices) which is medically and clinically not indicated, unnecessary or inappropriate under the circumstances or which is not in accordance with the recognized treatment protocols and procedures, without due regard to both the financial and health interests of the patient.

"The Act" means the Medical Aid Funds Act, 1995 (Act No. 23 of 1995) as amended.

"Regulations" means the Regulations made in terms of section 44 of the Medical Aid Funds Act, 1995.

"Practice number" means a unique practice billing code number allotted to a supplier of healthcare services providing services to members of registered medical aid funds issued by Namaf.

"Private practice" means the conduct of professional practice, including the treatment of patients and provision of health services to patients, for personal profit as contemplated in the Hospitals and Health Facilities Act, 1994 (Act No. 36 of 1994)

"Practioner or supplier of healthcare services" means -

- (a) a health facility or hospital as defined in section 1 of the Hospitals and Health Facilities Act, 1994 (Act No. 36 of 1994); and
- (b) a person who is registered and authorized to practice under the -
  - (i) Allied Health Services Professions Act, 2004 (Act No. 7 of 2004);
  - (ii) Medical and Dental Professions Act, 2004 (Act 10 of 2004);
  - (iii) Pharmacy Act, 2004 (Act No. 9 of 2004);
  - (iv) Nursing Act, 2004 (Act No. 8 of 2004); and
- (v) Social Work and Psychology Act, 2004 (Act No 6 of 2004)

"Operating-theatre" means a room or a place where surgical activities are carried out and in which provision is made for those facilities as set out in these requirements.

"Unattached operating theatre-unit" means an operating-theatre unit not attached to a hospital or nursing home, and where a patient is operated for minor surgical procedures.

"Waste" means overutilization of services or other practices that, directly or indirectly, result in unnecessary costs to the healthcare system. It is not generally considered to be caused by criminally negligent actions, but by the misuse of resources.

## 2. Applicability

These requirements apply to any supplier of healthcare services and suppliers of medical devices who seek to have their claims or statement account directly recognized by registered medical aid funds for healthcare services rendered or delivered to members of such funds.

## 3. The purpose of practice of numbers

- 3.1 The purpose of a practice number is:
  - 3.1.1 for identification of a supplier of healthcare services or supplier of medical devices in claims submitted to registered funds;
- 3.1.2 for the proper administration and processing of claims by registered funds; and
- 3.1.3 to give access to the holders thereof to applicable coding structure namely, diagnostic,

Page 3 of 13



- 4.5 A work permit in case of non-Namibian healthcare providers. A practice number will be allotted to practice only in accordance with the conditions as stipulated in his or her work permit issued by the Ministry of Home Affairs.
  - 4.5.1 A non-Namibian provider of healthcare services with a restricted or limited work permit will not be granted a practice number to practice independently.
  - 4.5.2 For a non-Namibian supplier of healthcare services with conditional work permit linking them to a specific practice, a HPCNA registration certificate with the main employer indicated thereon must be submitted.
  - 4.5.3 Where a supplier of healthcare services is in fulltime employment of any institution / employer, wishes to engage in limited private practice / conduct additional work outside his / her normal working hours, the following shall apply:
    - (a) The main employer as indicated on the HPCNA registration certificate (in the case of foreigners), must provide written permission for the Healthcare Professional to conduct work at another facility / practice.
    - (b) The work permit must indicate the additional place of work, in line with the permission granted by the Healthcare Professional's main employer.
- 4.6 In all the cases where a supplier of healthcare service who is using Ministry of Health and Social Services licence issued in the name of their employers, such applicants must provide a letter confirming their employment with such owners of such facilities and that such facilities have sufficient consulting rooms to accommodate them.
- 4.7 A bank confirmation letter valid for a period of three months providing the bank account details in which claims in respect of services rendered to members of registered Funds will be reimbursed. In cases where healthcare practitioners are working in a group practice, the reimbursement of claims shall be paid to one bank account. The name of the bank account must correspond with the name of the practice/facility as set out on the Ministry of Health and Social Service certificate or licence.

## 5. Further requirements for issuance practice numbers in case of:

## 5.1 Practices that emit radiation source or nuclear material

A valid licence issued by the National Radiation Protection Authority for all practices that emits radiation source or nuclear material as contemplated in section 16 and 21 of the of the Atomic Energy and Radiation Protection Act, 2005 (Act No. 5 of 2005) e.g., for X-rays.

## 5.2 Laboratories

- 5.2.1 In the case of Laboratories:
  - (a) Except for depots, every Laboratory where testing takes place must be identified and must apply for a practice number to identify the laboratory.

Page 5 of 13

## 5.5 Rehabilitation centers accommodation and physical care of persons who are dependent on dependence producing substances or physical or mental treatment

In addition to a valid licence issued by the Ministry of Health and Social Services under section 31 of the Hospitals and Health Facilities Act, 1994 (Act No. 36 of 1994), an application for a practice number relating to the accommodation and physical care of persons who are dependent on dependence producing substances or in which persons receive mainly physical or mental treatment must submit a registration or temporary registration certificate contemplated in section 20 (3) or (4) of the Abuse of Dependence-Producing Substances and Rehabilitation Centres Act, 1971 (Act No. 41 of 1971).

#### 5.6 Ambulance Services

## 5.6.1 In the case of Ambulance Services:

- (a) The ambulance service must apply for a practice number to enable Funds to identify the emergency service who is providing the service.
- (b) Every Emergency Care Technician, Basic, Intermediate and Advanced Life Support must apply for a practice number for the identification of who provided treatment to a patient, whether it is during ground or air transport.
- (c) Each Ambulance must also apply for a practice number (the implementation of this requirement is dependent on availability of system support for the infrastructure).
- (d) A valid licence issued by the Ministry of Health and Social Services as contemplated in the Hospital and Health Facilities Act, 1994 (Act No. 36 of 1994).

## 5.7 Unattached Operating Theatre Unit

A valid registration certificate issued by the Ministry of Health and Social Services under section 23 of the Hospital and Health Facilities Act, 1994 (Act No. 36 of 1994).

## 5.8 Multidisciplinary practices

- 5.8.1 In line with HPCNA's ethical rules stance that a healthcare professional should at all times act in the best interest of the patient and place the clinical need of the patient paramount, Namaf recognizes the need to obviate the related perverse incentives embedded in multidisciplinary practices such as over-servicing, split billing, waste, abuse, self-referral and conflict of interest among others.
- 5.8.2 As an exception to the rule, where practitioners from different disciplines, with different scope of practice and registered by different Councils by the HPCNA seeks to practice Page **7** of **13**



## 5.11 Suppliers of medical devices

- 5.11.1 For suppliers of medical devices, the following requirements shall apply:
  - (a) Certified copy of registration of a company or legal entity; and
  - (b) Proof of payment of application or renewal fee.

#### 5.12 Locum Tenens

- 5.12.1 A provider who regularly uses *locum tenens* to run his/her facility must submit to Namaf the full name of such *locum tenens* and a copy of:
  - (a) A letter explaining why the provider requires the continued use of the *locum tenens* to run the facility, and not appoint such locum as an employee.
  - (b) Practice number of the locum tenens.
- 5.12.2 If the registered provider is not running the facility personally, Namaf may impose a time limit on the arrangement and retain the power to cancel the practice number of such a facility/ consulting room.
- 5.12.3 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.
- 5.12.4 A distinction must be made between the following two types of *locum tenens* when applying for a practice number:
  - (a) A healthcare practitioner who is standing in for another healthcare practitioner who might be unavailable for a short period of time, due to various reasons although he / she might own their own practice / employed by another practice.
  - (b) A healthcare practitioner who prefers to only work as *locum tenens* and who is not attached to another practice on a permanent basis. In other words, the healthcare practitioner is providing his / her services only as *locum tenens* (temporary place holder) at various practices at any given time.

#### 5.13 Mobile Clinics

- 5.13.1 Despite a licence issued by the MoHSS in terms of section 31 of the Hospital and Health Facilities Act, 1994 for providers of healthcare services who voluntarily conduct mobile practice, Namaf will not issue practice number for mobile clinic.
- 5.13.2 For claims or statement of account in respect of services rendered in a mobile clinic to be recognized by registered medical aid funds, the provider of healthcare services must have an established and licensed health facility with a valid practice number to which the mobile clinic is linked.



- 8.5 From the date of suspension of a practice number, all claims or statement of account raised by the provider of healthcare services for services rendered to members of the registered medical aid funds is invalid as set out in regulation 6.
- 8.6 Reinstatement of practice numbers will only be effective from the submission date of a fully complete reinstatement application form.
- 8.7 When a registered provider pays to Namaf the annual renewal fees determined in terms of this clause and together with submit required documents, Namaf shall issue an information sheet in the name of that registered person / practice as proof containing the following:
  - 8.7.1 the full names and surname of the registered person concerned to who the practice number is issued;
  - 8.7.2 contact details of the registered person / facility concerned to whom the practice number is issued;
  - 8.7.3 particulars of the profession in respect of which the person concerned is registered; and
  - 8.7.4 such additional particulars as Namaf may determine.
- 8.8 A practice number shall subject to rules of natural justice be suspended on occurrence of one or both of the following grounds:
  - 8.8.1 If a holder of a practice number has been convicted / suspended by the HPCNA for the transgression of the ethical rules, Namaf will subject to the rules of natural justice suspend the practice number for the duration as determined by the HPCNA.
  - 8.8.2 If the holder of a practice number contravenes the conditions for utilization of the practice number.

## 9. Conditions for utilization of practice number

- 9.1 All the claims in respect of services rendered by healthcare providers/ supplier of medical services tomembers 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 own practice number for identification.
- 9.2 In all cases where a healthcare provider / supplier of medical services is practicing as a solus (alone) at his/her facility one practice number will be sufficient for the purpose of these requirements.
- 9.3 In all other instances where a healthcare provider or supplier of medical services is practicing from moethan 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, as contemplated in section 31 of the Hospital and Health Facilities Act, 1994 (Act No. 36 of 1994).

