

Medicare Compliance Pathology PHC Information Sheet

Bulk billing for pathology testing is available to DoH Primary Health Care remote clients with a current Medicare number. Generally this covers most pathology tests collected at the health centre and processed by an approved Pathology Service Provider, although conditions may apply.

The [Medicare Benefits Schedule](#) provides a full description of tests, accepted abbreviations of tests, and conditions.

Pathology request forms must accompany each pathology sample. See [Pathology - Storage, Packaging & Transport](#). Pathology request documentation processes differ for:

- Electronic Health Records pathology request forms – recommended process
- Manual pathology request forms – to used ONLY when the EHR is not available

1. Electronic Health Record (EHR) Pathology Request Form

The recommended process for clinicians is to complete and print a pathology request form directly from the EHR. See Pathology and Radiology Requests ([PCIS](#) / EACS).

When generating the pathology request form, clinicians should ensure that all mandatory information such as Medicare Number and current address is on the client's EHR. The health centre address and the requesting Medical Practitioner are automatically inserted on pathology request forms. See [Pathology - Documentation](#).

The EHR pathology request form must be printed and signed by the client. If the request is generated when the client is not present the signature should be sought when the specimen is collected. The request form is then sent with the pathology sample. See [Pathology - Storage, Packaging & Transport](#).

2. Manual Pathology Request Form – ONLY used when the EHR is not available

Manual pathology request forms are provided by the pathology provider to DoH. The pathology request form allows the assignment of the applicable Medicare Benefit (bulk billing) for approved pathology tests to the pathology provider. Manual request forms are usually in the form of pads, and available on request from the pathology provider.

All applicable information fields on the request form are compulsory. Writing should be clear, concise, legible and without ambiguity. Describe the required tests clearly to ensure that the specific service can be provided by the service provider. See [Pathology - Documentation](#).

The manual pathology request form must be signed by the client. If the request is generated when the client is not present the signature should be sought when the specimen is collected. The request form is then sent with the pathology sample. See [Pathology - Storage, Packaging & Transport](#).

3. Non-Medicare Card Holders

Non-Medicare card holders do not qualify for Medicare Benefits and consequently are unable to be bulk billed for pathology services. To avoid the health centre being charged for the pathology tests:

- the mailing address of the client should be recorded on the EHR or on the manual request form
- 'DO NOT BULK BILL' should be hand written on the pathology request.

When this is done, the pathology service provider will then pursue reimbursement from the client.

4. Health Centre Charged for Pathology Services

The following will result in a rejection by Medicare of the pathology provider's claim for benefits for the pathology requested:

- expired Medicare number
- no Medicare number
- failure to correctly complete manual pathology requests
- failure to correctly complete requests for non-Medicare card holders

If the pathology provider cannot receive benefits from Medicare, then they will directly bill the health centre. Often this can be resolved by contacting the pathology provider and providing the missing information. Whilst the option to telephone the pathology provider is available, it has been known to be put on hold for more than 2 hours. Emphasis is therefore placed on maintenance of Medicare numbers and the correct completion of documentation.

5. Bulk Assignment Signature (BAS) Form

Client signatures are compulsory information on the pathology request forms. Medicare Australia requires a client's signature to authenticate legitimacy of each test requested. Where a client's signature is not obtained on the pathology request form, the [BAS](#) form process should be observed.

The BAS Form is a mandatory requirement by Medicare Australia. This form is a declaration by a responsible person (excluding Medical Officer / Nurse / Aboriginal and Torres Strait Islander Health Practitioner) that to the best of their knowledge the requested pathology test/s have been appropriately requested and collected. It is a requirement that BAS Forms are kept for a period of 18 months for Medicare Australia auditing purposes.

5.1 Electronic Health Records (PCIS / EACS)

At the conclusion of each calendar month the Medicare Support Officer will generate a report for each health centre called the Bulk Assignment Signature Report which includes the BAS Form and a list of every client that has had a pathology request within the given period.

The signed BAS report will be sent to the relevant Primary Health Care Manager (PHCM) by the Medicare Support Officer. It is the responsibility of the PHCM to ensure that the BAS Form is filed in the BAS folder (in chronological order, most recent report to the front) and kept for a minimum period of 18 months (the date of which is on the bottom of the BAS form and highlighted). After 18 months has elapsed the original document can be destroyed.

Note: The process to facilitate the Bulk Assignment Signature Report is in development for EACS.

6. Point of Care Pathology Testing

The point of care Medicare items that can be claimed by health centre staff include:

- Item 73802 Hb (using either a HemoCue or i-STAT)
- Item 73806 Pregnancy Test
- Item 73840 HbA1c (using a DCA 2000 as part of the QAAMs project)
- Item 73844 Urinary ACR (using a DCA 2000 as part of the QAAMs project)

For details refer to [Point-of-Care Analysers](#) or [Simple Pathology](#).

Forms:	- Pathology Request Form available via the EHR
	- Manual pathology request forms available from Pathology Providers
	- Bulk Assignment Signature Form available via the EHR

Related Atlas Resources:	PHC Medicare Cheat Sheets::
Section 19 Medicare	Point-of-Care Analysers
Section 18 Pathology	Simple Pathology
Section 7 Health Records	Australian Government: Medicare Benefits Schedule