

# LECOM Summer Primary Care 2015 CME Conference

## How to Avoid Flaws with the Laws or being Fooled by the Rules

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## Florida Laws Governing the Practice of Osteopathic Medicine

1. Florida Constitution (Article X).
2. Florida Statutes:
  - a. Chapter 409: Medicaid.
  - b. Chapter 456: Health Professions, General Provisions.
  - c. Chapter 459: Osteopathic Medicine.
  - d. Chapter 766: Malpractice.
  - e. Chapter 893: Crimes, Controlled Substances.
3. Florida Administrative Code:
  - ✓ 64B15: Board of Osteopathic Medicine
4. Common Law.

## Civil Laws

Torts: professional and general obligations.

Intentional	Unintentional
Assault	Negligence
Battery	Malpractice
Fraud	Negligent Misrepresentation
Infliction of Emotional Distress	Respondeat Superior
Invasion of Privacy	
False Imprisonment	

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## Civil Laws (cont.)


### Contracts

1. Elements:
  - a. Offer;
  - b. Acceptance;
  - c. Consideration; and a
  - d. Meeting of the minds; intention to be bound.
2. Types:
  - a. Oral;
  - b. Written; and
  - c. Quasi/Implied.

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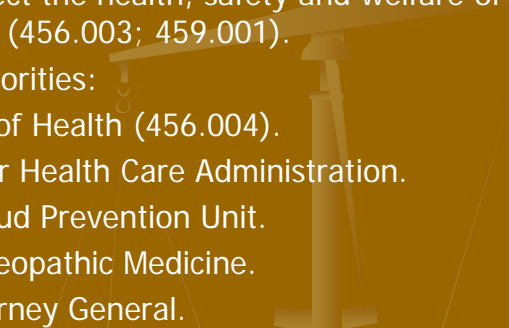
## Civil Laws (cont.)

### Contracts (cont.):

3. Occasions:
    - a. Outset of the patient relationship;
    - b. Managed care situations;
    - c. Guarantees;
    - d. Employment;
    - e. Landlord; and
    - f. Vendors.
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## Regulation of the Practice of Osteopathic Medicine in Florida

1. No. 1 purpose: protect the health, safety and welfare of the public (patients) (456.003; 459.001).
  2. Key Regulatory Authorities:
    - a. The Department of Health (456.004).
    - b. Florida Agency for Health Care Administration.
    - c. The Medicaid Fraud Prevention Unit.
    - d. The Board of Osteopathic Medicine.
    - e. Office of the Attorney General.
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## DO Regulation in Florida

3. The Board of Osteopathic Medicine (459.004):
  - a. Seven members.
  - b. Appointed by the governor.
  - c. Four-year terms.
  - d. Five are Florida DOs who have practiced at least 4 years.
  - e. Two are Florida citizens who have never been doctors.
  - f. One member must be 60 or older.
4. Key definition: "Practice" (459.003 (3)):
  - ✓ The diagnosis, treatment, operation or prescription for
  - ✓ Any disease, pain, injury, deformity, or other physical or mental condition
  - ✓ Based on educational standards and requirements and which
  - ✓ Emphasizes the importance of musculoskeletal structure and manipulative therapy.....


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## D.O. Licensing in Florida

1. Thirteen requirements for an initial full, unrestricted license (459.0055).
  - ✓ Age, education, character, record, duties, etc.
2. Also available via reciprocity.
3. Key duties after initial grant of licensure:
  - a. Timely renewal;
  - b. Stay legal;
  - c. Pay fees; and
  - d. Complete CME requirements.

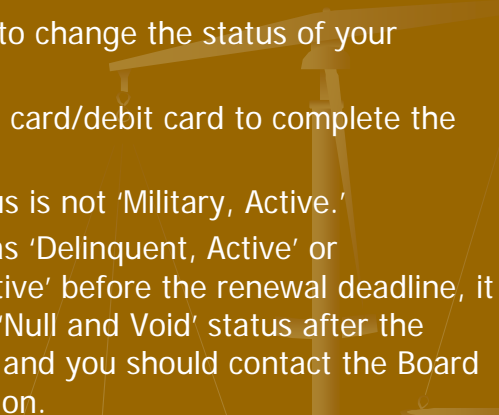
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## D.O. Licensing in Florida (cont.)

4. Types of licenses:
    - a. Full Osteopathic License;
    - b. Limited license (no compensation allowed);
    - c. Temporary Certificate to Practice in Areas of Critical Need;
    - d. Osteopathic Medical Certificate; or
    - e. Physician in Training Registration (interns, residents and fellows).
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## D.O. Licensing in Florida (cont.)

5. You may renew online if:
    - a. You do not need to change the status of your license.
    - b. You have a credit card/debit card to complete the transaction.
    - c. Your license status is not 'Military, Active.'
    - d. If your license was 'Delinquent, Active' or 'Delinquent, Inactive' before the renewal deadline, it will be moved to 'Null and Void' status after the renewal deadline and you should contact the Board office for instruction.
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## D.O. Licensing in Florida (cont.)

6. Disqualifications:
  - a. Drug abuse;
  - b. Child abuse;
  - c. Violation of federal drug law;
  - d. Medicare/Medicaid disqualification or fraud; or
  - e. Immigration issues.

## D.O. Licensing in Florida (cont.)

7. CME requirements: 40 hours every two years.
  - a. General Hours—35; 20 must be AOA Category 1-A.
  - b. Medical Errors—2 hours, must be live.
  - c. Laws and Rules—1 hour, must be live.
  - d. Professional & Medical Ethics/Risk—1 hour, must be live.
  - e. Federal & State Laws Related to the Prescribing of Controlled Substances—1 hour, must be live.
  - f. Domestic Violence—2 hours every third renewal (part of general hours) (456.031).

Note: for First Time Renewal: in addition to the above required hours, licensees must also complete a 1 hour HIV/AIDS course (456.033)

Note 2: Florida Board approved courses can be found at [www.cebroke.com](http://www.cebroke.com).

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## D.O. Licensing In Florida (cont.)

8. Completion of Physician Survey to the Department of Health (459.081).
  - a. Frequency and geographic location of practice;
  - b. Practice setting;
  - c. Percentage of time spent in direct patient care;
  - d. Any anticipated change in license status;
  - e. Areas of specialty or certification; and
  - f. Availability of critically needed services:
    - i. OB;
    - ii. Radiological services; and
    - iii. ER and trauma service.

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## D.O. Licensing in Florida (cont.)

9. Board required information of licensees:
  - a. All medical education received;
  - b. Each hospital at which the licensee has privileges;
  - c. An address *of record*;
  - d. Any specialties;
  - e. The date the licensee began practice;
  - f. Any faculty appointments;
  - g. A description of any criminal offenses;
  - h. A description of any discipline in the last 10 years;
  - i. Any qualifications; and
  - j. Facts regarding practice in other jurisdictions.

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## D.O. Licensing in Florida (cont.)

10. Consents presumed of licensees:
  - a. To give handwriting samples during any investigation;
  - b. To waive the confidentiality of and authorize the release of their medical records when there is reason to believe a violation of law has occurred; and
  - c. To waive any objection to the admissibility of medical reports in disciplinary proceedings.

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## D.O. Licensing in Florida (cont.)

11. Privileges and Obligations of licensees (459.011):
  - a. Required to follow all regulations relating to the reporting of births and deaths and other public health duties;
  - b. Have equal rights and obligations as all other physicians;
  - c. Have equal rights to hold positions in public institutions;
  - d. Have the right to practice as taught;
  - e. Have equal professional status as medical doctors; and
  - f. Have recognition for any Osteopathic specialties secured and have that specialty be given equal status as any corresponding allopathic specialty.

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## Duties of the D.O.

1. General Practice Standards.
  - a. Must adhere to the "prevailing professional standard of care".
  - b. Must act in a way acceptable to reasonably prudent, similarly situated health care providers.
  - c. Must exhibit care prior to making any incision (right patient/right spot).
  - d. Do not be afraid to apologize.

FL Statues 90.4026; 766.102; FL Code 64B8-9.007

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## Duties (cont.)

2. Honor Patient "Bill of Rights":
  - a. Respect;
  - b. Privacy;
  - c. Response;
  - d. Information;
  - e. Financial disclosure;
  - f. Who's in charge; and
  - g. Clothes.



## Duties (cont.)

3. Financial responsibility to pay claims and costs ancillary thereto arising out of the rendering of, or the failure to render, medical care or services: (459.0085):
  - a. Escrow account;
  - b. Liability insurance (100K/300K);  
✓ Surgical centers (250K/750K); or
  - c. Letter of credit to back insurance;
  - d. Within 30 days of license/renewal; but
  - e. Certain exemptions apply, so long as the following notice is posted: "YOUR OSTEOPATHIC PHYSICIAN MEETS THESE REQUIREMENTS AND HAS DECIDED NOT TO CARRY MEDICAL MALPRACTICE INSURANCE. This notice is provided pursuant to Florida law."



## Duties (cont.)

4. Exemptions to Financial Obligations:
  - a. Physicians employed by U.S. or FL;
  - b. Physicians on inactive status;
  - c. Physicians not practicing in the state;
  - d. Physicians with a limited license;
  - e. Physicians who only teach;
  - f. Long-term physicians (15 years), with good record who practice part time; or
  - g. Who agree to pay judgments subject to discipline within a certain amount of time (expanded notice to patients required)

459.0085 (5)

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## Duties (cont.)

5. Recording Keeping (456.057/459.012 et. seq.).
  - a. Physician/practice owns the records.
  - b. Must maintain records in confidence.
  - c. Furnish copies upon request.
    - ✓ Not conditioned upon payment of fees.
  - d. Can give treatment report in lieu of records.
  - e. Psychiatrist records direct to next psychiatrist.
  - f. Keep record of any disclosure.
  - g. Give notice of termination of practice.

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## Duties (cont.)

5. Recording Keeping (cont.):
  - h. Must keep legible medical records that justify the course of treatment of the patient and contain:
    - i. Patient histories;
    - ii. Examination results;
    - iii. Test results;
    - iv. Drugs prescribed;
    - v. Consultations; and
    - vi. Hospitalizations.

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## Duties (cont.)

6. Release and reproduction of records (FAC 64B15-15).
  - a. Release cannot be conditioned on payment of a bill
  - b. Release can be conditioned on payment for cost of reproduction:
    - ✓ \$1.00/page for the first 25 pages and \$.25/page thereafter.
  - c. X-rays, etc. can be actual costs.
  - d. Records should be produced within 30 days.
  - e. When records are released, the original or a copy must be maintained.
  - f. Notation must be made in the records as to whom they were released.

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## Duties (cont.)

7. Record Retention Rules.
  - a. Five years from time patient was last seen.
  - b. Two years after death of a physician.
  - c. Two years after dissolution of a practice.

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## Duties (cont.)

8. Written Prescriptions (456.42).
  - a. Must be legibly printed or typed so as to be capable of being understood by the pharmacist filling the prescription.
  - b. Must contain:
    - i. The name of the prescribing practitioner;
    - ii. The name and strength of the drug prescribed;
    - iii. The quantity of the drug prescribed (in *both* textual and numerical formats for CS); and
    - iv. Directions for the use of the drug.
  - c. Must be dated (for CS: in numerical, month/day/year format, or with the abbreviated month written out, or the month written out in whole).
  - d. Must be signed by the prescribing practitioner on the day when issued.
  - e. Must use counterfeit-proof prescription pads for CS.

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## Duties (cont.)

9. Electronic Prescriptions allowed but must contain (456.43):
  - a. Name of the prescribing practitioner;
  - b. Name and strength of the drug prescribed;
  - c. Quantity of the drug prescribed in numerical format;
  - d. Directions for use of the drug;
  - e. Must be dated and signed by the prescribing practitioner on the day issued; and
  - f. Electronic prescribing shall not interfere with a patient's freedom to choose a pharmacy.
  - g. Electronic prescribing software shall not use any means or permit any other person to use any means, to influence, through economic incentives or otherwise, the prescribing decision of a physician.

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## Duties (cont.)

10. Transparency and Profiles.
  - a. Must provide itemized billing statements upon request (459.012).
  - b. Patients with breast cancer or a high risk thereof must be given all treatment options (459.012).
  - c. Must notify patients of adverse events that result in serious harm, but such notices are not admissions and are inadmissible as evidence (456.0575).
  - d. Profiles must be maintained and updated (456.041), with all relevant data about physician, including discipline and malpractice claims.

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## Duties (cont.)

### 10. Transparency and Profiles (cont.):

- e. Update the profile within fifteen days of material changes (456.042).
- f. Notify the Board prior to moving to a new practice.
- g. Notify patients of relocations.
- h. Must report claims of professional liability to the Office of Insurance Regulation (456.049).

FL Statutes 456.035, 456.042

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## Duties (cont.)

### 11. Regulation of "Pain" Clinics (459.0137).

- a. Must have special permit.
- b. Must register with DOH; separate registration for each clinic.
- c. Must have board-certified medical director.
- d. Limits amount of medicates dispensed when paid for in cash.
- e. Have counterfeit-proof prescription pads
- f. Physicians dispensing controlled substances must register with state DOH.
- g. Physicians working in pain clinics must verify a broad range of regulatory compliance (facility/equipment/infection control/quality, etc.).
- h. No search warrants needed for a review of clinic records.

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## Duties (cont.)

12. Limits placed on certain practices and actions:
  - a. There must be a special registration for certain liposuction done in physician offices (over 1k cubic centimeters) (459.005).
  - b. Treatment of obesity is limited to certain patients and the physician is prohibited from making certain claims (459.135; 64B15-14.004).
  - c. Medicare patients cannot be refused service in an emergency (456.056).
  - d. Advertising must be factual; never false or misleading; and any ads for free or discounted services must be accompanied by a statement that the patient has a right to cancel payment. (456.062).

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## Florida Laws and Duties (cont.)

12. Limits on certain practices and actions (cont.)
  - e. Must be a treatment plan and informed consent for the treatment of pain w/ controlled substances (456.44)
  - f. Must be registration and the presence of an anesthesiologist for many types of surgery performed in offices.
  - g. Dispensing of medications must be in accordance of DOH record keeping and in compliance with the Florida Pharmacy Act and FDA regulations, where applicable.
13. DOs are mandatory reporters of abuse of children or vulnerable adults (age or disability). See FS 39.21 and 415

64B15-14

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# Physician Prohibitions

Thou shall not:



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## Prohibited Acts for the D.O.

1. A general statement of offenses is contained in 456.072, 459.013 and 459.015.
  - a. 456.072 lists 40 offenses for which discipline may be issued.
  - b. 459.013 contains a number of offenses primarily dealing with practicing without a license or obtaining or helping someone else obtain a license through improper means (usually lying or withholding information).
  - c. 459.015 lists 47 different violations many dealing with lying or providing false information in any regulatory context.
  - d. Failing to carry out any affirmative duty is a violation.
  - e. Any violation of law or regulations in another jurisdiction and the failure to report same are violations.
  - f. Virtually any felony or misdemeanor is a violation.
  - g. Asking patients about gun ownership is the newest violation.

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## Prohibited Acts (cont.)

2. Emergency suspensions may be sought for offenses that present immediate threat to public health and safety, e.g.:
  - a. Medicaid fraud;
  - b. Controlled substance violations;
  - c. Repeated malpractice (3X);
  - d. Failed drug test; or
  - e. Default on student loans.

456.074

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## Prohibited Acts (cont.)

3. Fraud and Abuse—key examples (federal and FL).
  - a. Knowingly submitting a bill that is or that does not conform to program rules to a government payor (Exchanges covered under the ACA);
  - b. Performing unnecessary services;
  - c. Having unqualified people do work;
  - d. Routinely waiving/advertising forgiveness of co-pays;
  - e. Taking a “friends and family” approach to referrals;
  - f. Paying for referrals to you;
  - g. Charging patients “access”, “administrative” or “fees”; or
  - h. Selling samples.

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## Prohibited Acts (cont.)

4. Other specific Florida provisions related to F&A.
  - a. Referrals to investors in one's practice is forbidden, absent full notice to the patient (456.052).
  - b. Mini-Stark law (456.053) covering referrals involving:
    - i. Clinical lab services;
    - ii. Physical therapy;
    - iii. Rehab services;
    - iv. Diagnostic imaging; and
    - v. Radiation therapy.
  - c. Kickbacks are prohibited (456.054).

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## Prohibited Acts (cont.)

5. Practicing while impaired.
  - a. Defined:
    - i. Being unable to practice osteopathic medicine with reasonable skill and safety to patients
    - ii. with reasonable skill and safety to patients
    - iii. by reason of:
      - ✓ illness;
      - ✓ use of alcohol, drugs, narcotics, chemicals;
      - ✓ any other type of material; or
      - ✓ as a result of any mental or physical condition.
  - b. Treatment provided for (section 456.076) through the Professionals' Resource Network (PRN) <http://www.flprn.org/>

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## Prohibited Acts (cont.)

5. Practicing while impaired (cont.):
  - c. Impairment Safe harbor:
    - i. No other complaint is pending;
    - ii. The licensee has acknowledged the impairment problem;
    - iii. The licensee has voluntarily enrolled in an appropriate, approved treatment program;
    - iv. The licensee has voluntarily withdrawn from practice; and
    - v. The licensee has executed releases for his/her own medical records.

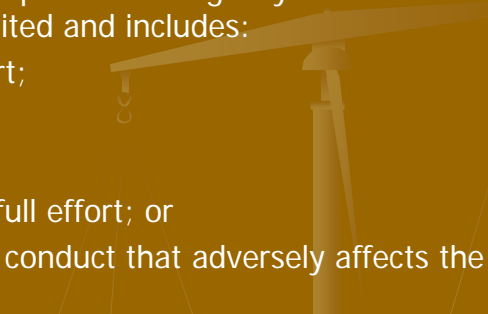
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## Prohibited Acts (cont.)

6. Sexual Misconduct (456.063).
  - a. *Strict liability* provision.
  - b. Covers patients/family members and representatives
  - c. No inducement of others to engage in sexual activity.
  - d. No inducement of others to seek sexual activity.
  - e. A patient cannot **by law** consent to sexual activity.
  - f. Physicians have duty to report sexual misconduct of colleagues.
  - g. Sexual harassment of staff forbidden by Title VII and Florida Civil Rights Law (Chapter 760).
  - h. Sexual conduct with patients/families and sexual harassment of colleagues are also violative of AOA ethical rules.

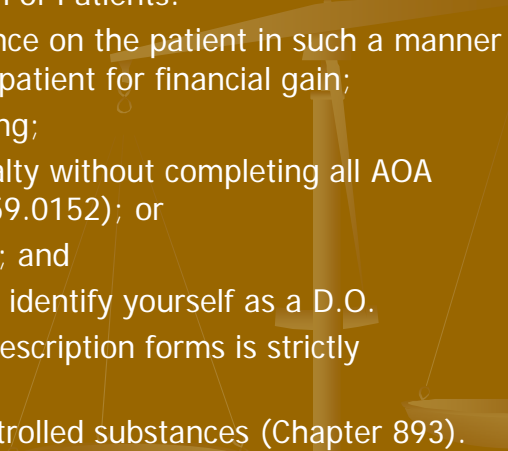
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## Prohibited Acts (cont.)

7. Concerted refusal to provide emergency care (459.0145) is prohibited and includes:
    - a. Refusing to report;
    - b. Absenting;
    - c. Resigning;
    - d. Giving less than full effort; or
    - e. Instigating other conduct that adversely affects the facility.
- 

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## Prohibited Acts (cont.)

8. Financial Exploitation of Patients:
    - a. Exercising influence on the patient in such a manner as to exploit the patient for financial gain;
    - b. Vexatious soliciting;
    - c. Claiming a specialty without completing all AOA requirements (459.0152); or
    - d. False advertising; and
    - e. You must always identify yourself as a D.O.
  9. Pre signing blank prescription forms is strictly forbidden.
  10. Self prescribing controlled substances (Chapter 893).
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## Prohibited Acts (cont.)

11. No passes for friends or family.
  - a. Physician-patient relationship begins with family and friends in the same fashion as w/ strangers.
    - ✓ Test: offer/acceptance.
  - b. Writing a prescription can create the relationship.
  - c. All rules and records' obligations apply with family and friends.
12. Fraudulently altering or destroying records relating to patient care or treatment, including, but not limited to, patient histories, examination results, and test results
  - ✓ At least, an adverse inference is created.

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## Prohibited Acts (cont.)

13. *Anti-retaliation rule*: cannot refuse to provide healthcare based on a patient's participation in pending or past litigation or disciplinary action, unless such litigation or disciplinary action directly involves the osteopathic physician requested to provide services.
14. Failure to report: Failing to report to DOH any licensee under chapter 458 or chapter 459 whom the osteopathic physician knows has violated the grounds for disciplinary action.
15. Being found by any court to have provided corroborating written medical expert opinion without reasonable investigation.

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## Florida Constitutional Provisions

1. Limit on abortions of minors (Article X, Section 22):
  - a. "Notwithstanding a minor's right of privacy provided in Section 23 of Article I, the Legislature is authorized to require by general law for notification to a parent or guardian of a minor before the termination of the minor's pregnancy."
  - b. Exceptions to notice requirements:
    - i. Medical emergency;
    - ii. Parent waives right to notice;
    - iii. Minor is married;
    - iv. Minor has dependent children; or
    - v. Evidence of abuse by parents.

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## Florida Constitutional (cont.)

2. Patients' right to access of records of adverse medical incidents (Article X, Section 25):
  - a. Patients have a right to have access to any records made or received in the course of business by a healthcare facility or provider relating to any adverse medical incident.
  - b. Adverse medical incidents are:
    - ✓ Incidents of negligence, misconduct, or neglect
    - ✓ That cause or *could have* caused
    - ✓ Death or serious injury to a patient, including those
    - ✓ That must be reported to government or internally.
  - c. Access means the right to inspect and copy.

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## Florida Constitutional (cont.)

3. Prohibition of medical licensure after repeated medical malpractice (Article X, Section 26):
  - a. Medical malpractice is defined as the "failure to practice medicine with that level of care, skill, and treatment recognized in general law relating to healthcare providers' licensure..."
  - b. Anyone who commits three or more incidents of malpractice is ineligible for continued licensure.
  - c. Finding of malpractice must be by final judgment of a court, administrative body or an arbitrator.
  - d. It does not matter *where* the malpractice occurs.

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## Complaints Against Physicians

1. Complaints can be filed with the Department of Health by any competent person. DOH will not handle:
  - a. Fee/Billing disputes;
  - b. Personality conflicts; or
  - c. Rudeness.
2. Complaints received and processed by DOH:
  - a. Quality of care;
  - b. Misdiagnosis;
  - c. Substance abuse/impairment;
  - d. Advertising violation;
  - e. Inappropriate prescriptions;

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## Complaints Against Physicians (cont.)

2. Complaints received and processed by DOH (cont.):
  - f. Sexual contact;
  - g. Insurance fraud;
  - h. Excessive tests/treatments;
  - i. Failure to release records; and
  - j. Patient neglect/abandonments.
3. Three claims to avoid:
  - a. He/she did not tell me.
  - b. They did not care.
  - c. I was not treated fairly.

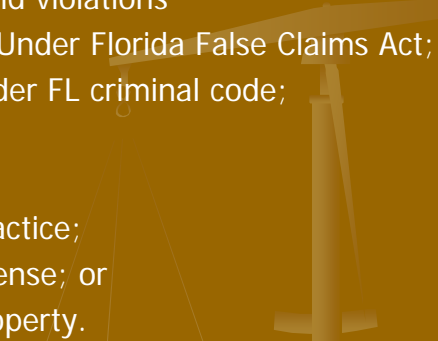
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## Florida Statutory Penalties

1. Offenses which may be prosecuted as felonies (459.0113)
  - a. Practicing without the proper license;
  - b. Attempting to obtain a license via a *knowing* misrepresentation;
  - c. Operating a pain clinic without proper registration; or
  - d. Improper dispensing of a C-II or III.
2. Offenses which may be prosecuted as misdemeanors:
  - a. Knowingly concealing information relating to a violation of Chapter 459;
  - b. Willfully making a false oath or affirmation;
  - c. Dispensing medication in an unregistered pain clinic;
  - d. Violation of the Florida anti-self-referral law; or
  - e. Paying or receiving kickbacks or engaging in fee splitting.


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## Florida Statutory Penalties (cont.)

3. Penalties for Medicaid violations
    - a. Treble damages Under Florida False Claims Act;
    - b. Incarceration under FL criminal code;
    - c. Fines;
    - d. Repayment;
    - e. Dissolution of practice;
    - f. Revocation of license; or
    - g. Divestiture of property.
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## Medical Board Penalties

1. License revocation/suspension;
  2. License limitation/probation;
  3. Retraining;
  4. Censure/Reprimand;
  5. Fines;
  6. Costs;
  7. Community service; and
  8. Internet posting.
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## Actual Florida Discipline Cases

1. In December, 2014, a DO in Dade City suffered an emergency suspension of his license after he convinced several female patients to have minor surgical procedures performed *at their homes* where he:
  1. Consumed alcohol while allegedly treating them;
  2. Injected them, without consent or prescription, with controlled substances; and
  3. Proceeded to have sex with them after they lapsed into unconsciousness.

How many offenses is that?
2. Two Florida doctors were convicted of money laundering in connection with their improper prescribing practices at a pain clinic last summer. They face ten years in jail and are required to pay back over 1M in earnings.

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## Actual Florida Discipline Cases

3. A Citrus County DO had his license suspended for malpractice as he repeatedly prescribed C-II pain killers to an undercover police officer. The charges against him included:
  - a. Prescribing controlled substances without justification;
  - b. Failing to employ other modalities for the treatment of pain;
  - c. Failing to order appropriate diagnostic tests;
  - d. Failing to perform adequate physical examinations; and
  - e. Failing to make a proper record of treatment.
4. Another physician was suspended indefinitely for financial exploitation of a patient; failing to properly document treatment and failing to obtain proper consent from a patient after without any *sound medical reasoning* diagnosed a patient with "chemical toxicity" and sought to treat him with "detox drops."

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## Actual Florida Discipline Cases

5. MD/clinic owner was criminally charged in both TX and FL for poor record keeping, allowing treatment by unlicensed professionals and allowing said individuals (one self-identified as a “naturopathic provider”) to order numerous tests for autistic pediatric patients.
6. Scientologist/MD/ERP was fined 10K and suspended for one year for prescribing schedule IV sedatives by phone for a gravely ill member of the congregation who later died of malnutrition.
7. A Fort Lauderdale physician had his license revoked by the FL Medical Board based on charges of lying under oath as an expert witness. He was also accused of exaggerating his credentials in sworn statements while serving as a paid expert witness in a medical-malpractice case.
8. A surgeon was recently accused of violating practice standards by making egregious mistakes in two cases. In one of the cases, he was accused of packing a wound with Sani-Wipes – used for cleaning hospital counters – instead of the proper surgical materials.

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## Conclusion on FL Laws and Rules: Ten Golden Guides

1. Tell the truth 24/7.
2. Treat patients and their families with respect.
3. Do not divert/misuse drugs.
4. Keep accurate and detailed records.
5. Be scrupulous in dealing with Medicaid and Medicare; check with CMS.
6. Seek help if you become impaired.
7. Be aware of practice rules/limitations.
8. Maintain financial obligations.
9. Only examine those anatomical parts required.
10. Never, ever become sexually involved with a patient.

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