

Proper Practices **under the Health Care Voucher Scheme**

To all Enrolled Health Care Providers:

Paragraphs 1 to 4 below contain a set of directions given by the Government of the Hong Kong Special Administrative Region pursuant to Clause 46 of the “Definitions, and Terms and Conditions of Agreement” (“the Agreement”) of Health Care Voucher Scheme (“HCVS”). All enrolled health care providers (“EHCPs”) are required to duly observe and comply with the directions set out herein, which are conducive to the effective administration of the HCVS. Non-compliance with the directions may result in termination of the Agreement. Where applicable, expressions used herein shall have the meaning assigned to them under the Agreement.

1. Use of health care vouchers

- Only healthcare professionals already enrolled under the HCVS can accept the use of Vouchers by voucher recipients (“VRs”). EHCPs shall NOT allow leave relief service providers to use their EHCP Account to claim Vouchers for the healthcare services provided by them to the VRs.
- EHCPs should make available the use of Vouchers by VRs with eHealth (Subsidies) Account created to settle EHCP Fees.
- Neither an EHCP nor an Associated Organization may charge any person any fees for creating an eHealth (Subsidies) Account, or pairing or un-pairing of two eHealth (Subsidies) Accounts, or using Vouchers in an account.
- Vouchers can only be used to settle the EHCP Fees for the provision of healthcare services including preventive and curative services (e.g. Designated Services under the Reward Scheme) and rehabilitative services.
- Vouchers are NOT applicable to inpatient services, pre-paid healthcare services and day surgery procedures, such as cataract surgery or endoscopy services.
- Vouchers shall NOT be used by VRs to employ staff or only to purchase products not otherwise provided/ prescribed by EHCPs, such as medication, spectacles, dried seafood, personal care products, food products or medical equipment. However, Vouchers can be used for the treatments or services prescribed and provided by EHCPs in their professional capacities to meet the healthcare needs of VRs after consultation, as well as the medications, healthcare products and medical equipment, etc. provided to VRs during the course of treatment. In this regard, EHCPs should assume professional responsibility towards VRs.
- Unless otherwise specified, Vouchers CANNOT be used for public healthcare services or services subsidized by the Government, such as the subsidized services under the various Public-Private-Partnership Programmes of the Hospital Authority and the Colorectal Cancer Screening Programme of the Department of Health, etc.
- Vouchers are NOT allowed for settling the service charges of healthcare services provided by the EHCP to himself/ herself (i.e. the EHCP cannot be the VR at the same time for any voucher claims). It is however allowed where a VR uses the Vouchers in the Paired Up eHealth (Subsidies) Account of his Spouse who is also the EHCP providing healthcare services to the VR.
- The total amount of Vouchers used by a VR (including Reward, if any, in the VR’s eHealth (Subsidies) Account (applicable where the EHCP Fees are for the Designated Services) and any Voucher in the Paired Up eHealth (Subsidies) Account of his Spouse) for the service provision shall NOT exceed the amount of EHCP Fees and the VR’s unused Quota (if applicable). When Vouchers are used to settle the EHCP Fees, for the avoidance of doubt, the EHCP Fees (whether

they are for the Designated Services or not) shall NOT be charged at a higher rate (whether directly or indirectly) than the fees of equivalent health care services provided by the EHCP to a person who does not use any Voucher/ who is not a VR.

- Neither an EHCP nor an Associated Organization shall enter into any agreement or arrangement with a VR (whether directly or indirectly) which has the effect of sharing the value of any Voucher or any Reward with the VR or (in the case where the Voucher Recipient uses the Voucher in the Paired Up eHealth (Subsidies) Account of his Spouse) the Spouse of the VR. Any advantage, whether in cash/ kind/ coupons/ bonus points/ other equivalent which carries a cash value, offered by the EHCP or the Associated Organization to a VR or a Spouse of the VR in such agreement or arrangement shall be considered as having the effect of sharing the value hereunder. In this regard, no advertisement or publicity or offer to such effect under the HCVS shall be allowed.
- VRs shall produce their Hong Kong Identity Cards ("HKICs") or Certificates of Exemption ("CoEs") issued by the Immigration Department to the EHCPs and receive in person the healthcare services provided by the EHCPs before they can use their vouchers to settle the relevant service fees. For medical laboratory technologists ("MLTs") enrolled under the HCVS, it means that the relevant laboratory tests shall be performed by the enrolled MLT for the VR himself/ herself. Vouchers CANNOT be used to pay for those healthcare services received or medication obtained through VR's family member or his/ her proxy. EHCPs shall verify the VRs' identity by checking against the particulars in their HKICs or CoEs and ensure that they are the one holding the identity documents. In the case where the VR has notified the EHCP that he would use Vouchers in the Paired Up eHealth (Subsidies) Account of his Spouse to settle the relevant service fees, a copy of the HKIC or CoE of the Spouse shall also be produced.
- No MLT enrolled under the HCVS shall accept the use of the Vouchers to perform any laboratory tests for a VR in the absence of a referral from (i) registered medical practitioner, (ii) registered dentist, or (iii) a person registered in respect of a medical clinic exempted under Section 8(1) of the Medical Clinics Ordinance, Cap. 343. If Vouchers are to be accepted for settling payment of laboratory services offered by enrolled MLTs, the laboratory investigations must be conducted based on proper referral from qualified health care professionals mentioned in (i), (ii) and (iii) above.
- Voucher claims shall not be made by optometrists under the HCVS for services unrelated to eye or vision care.

2. Consent of Voucher Recipient

When a VR agrees to use Voucher(s) (and/or Reward, if applicable) to settle the EHCP Fees for the provision of health care service(s) by the EHCP, the EHCP shall obtain from the VR a Consent of Voucher Recipient. The following points pertaining to the Consent of Voucher Recipient should be noted.

- Each Voucher claim transaction shall be supported by a valid Consent of Voucher Recipient.
- If the VR is illiterate, the witness shall, if consent of Voucher Recipient is provided in paper form, confirm that he has read the Consent of Voucher Recipient to the VR and provide the witness information (including name and HKIC number of the witness). If the VR is mentally incapacitated, the guardian shall complete the Consent of Voucher Recipient in paper form in the capacity as the VR's guardian and the guardian information (including name and HKIC number

of the guardian) shall be provided.

- The Voucher amount claimed for each claim transaction in the Consent of Voucher Recipient shall be properly checked and completed.
- To facilitate verification of claim transactions, the VR shall be requested to provide a Hong Kong contact telephone number (which can belong to the VR or his/her family member/carer) which can receive SMS.
- The “Notice on Use of Health Care Voucher” showing Voucher balance shall be given to the VR for retention.
- An EHCP shall keep at the EHCP’s place proper and full record of all Consent of Voucher Recipient given in paper form and the Shared Use Consent until the expiry of 7 complete financial years from the calendar year in which the relevant reimbursements are made or until any dispute between the parties in relation to the HCVS is settled or adjudicated, whichever is the later. To protect personal data, the aforesaid documents shall be kept in locked cabinets.
- When disposing documents or records holding personal data, EHCPs shall comply with relevant sections of Personal Data (Privacy) Ordinance (Cap. 486) and the guidance notes issued by Office of the Privacy Commissioner for Personal Data including the "Guidance on Personal Data Erasure and Anonymisation".

3. Submission and confirmation of voucher claims

- EHCPs shall input claims in the eHS(S) on the date of provision of the related healthcare services for VRs and their Spouses whose Vouchers are used, if any holding HKIC with a symbol “C” or “U” on it. In any other cases, EHCPs shall input claims in eHS(S) within 7 calendar days counting from the date of provision of the related health care services to the VRs. Late submission of claims may not be reimbursed.
- Before confirming the claims under the EHCP Account in the eHS(S) for reimbursement, the EHCP should check carefully the details of these claims to ensure that all the information submitted to the Government through the eHS(S) is true and correct.
- Improperly made claims will not be reimbursed. Some examples of improper Voucher claims are provided in the Annex. However, these are by no means exhaustive and EHCPs are advised to duly comply with all relevant clauses in the Agreement.

4. Use of HCVS logo

- Neither the EHCP nor his Associated Organization shall make any copies of the logo or display the logo at any places other than at that specified by the Director of Health.

5. Recommendation

- To avoid potential complaints or disputes, EHCPs are recommended to increase the price transparency of his/ her services as much as possible, for example, by displaying notices at their clinic(s) informing patients of their right to ask for quotation of the fees involved before receiving treatment; informing clearly the charges to patients on request before provision of services; and allowing patients to make informed choices of different management plans which may have different service charges.
- EHCPs should make use of the Smart ID card reader for verifying VR’s identity, obtaining the Consent of Voucher Recipient and any other consent, declaration and understanding in

connection with the use of Voucher, and for making voucher claims for VRs. Otherwise, EHCPs are required to account for, in eHS(S), why Smart ID card reader is not used.

- To facilitate prompt reimbursement of claimed Voucher amount (and/or Reward, if applicable), EHCPs are recommended to review duly the claims pending completion/confirmation under the "Task List" in the eHS(S), and complete and confirm these claims on or before the last day of a month. EHCPs can view the details of claims reimbursed in the "Monthly Statement" in the eHS(S).

Department of Health
November 2023

***This version supersedes and replaces any and all previous versions of Proper Practices under the Health Care Voucher Scheme.**

Health Care Voucher Scheme Case Scenarios

The following are cases of improper claims. Please note that in accordance with Clause 42 of the "Definitions, and Terms and Conditions of Agreement" ("the Agreement") of Health Care Voucher Scheme ("HCVS"), the Government of the Hong Kong Special Administrative Region shall not have any obligation to pay an enrolled health care provider ("EHCP") or his/her medical organization the amount of any health care voucher that a voucher recipient has consented to use if the EHCP or his/her medical organization is in breach of any provisions in the Agreement.

Detailed information of the Agreement can be accessible at www.hcv.gov.hk.

Example 1

Mr. X and Ms. Y both worked for the same medical organization. Mr. X had been enrolled in the HCVS but Ms. Y had not. In a routine inspection of voucher claims processed by EHCPs working under that medical organization, the Health Care Voucher Division found that the healthcare services for some claims processed under Mr. X's "EHCP account" in the eHealth System (Subsidies) were not provided by Mr. X himself but by Ms. Y. Mr. X and his medical organization both did not realize that this practice was inappropriate.

Points to note

- Only EHCP can process voucher claims under his/ her "EHCP account", and the concerned healthcare service must be directly delivered by him/her to the voucher recipient ^{Note (1)}.
- Medical organizations should encourage their non-enrolled healthcare professionals to enroll in the HCVS and provide the necessary support to their enrolment. Upon successful enrolment, these healthcare professionals will then be allocated their own "EHCP account" in the eHealth System (Subsidies) to process voucher claims for the elderly.
- The name(s) of EHCP(s) should be displayed in the clinic for the reference of voucher recipients.

Example 2

An EHCP claimed vouchers for elderly persons. Investigation however revealed that the vouchers in some claims were used for buying medication / herbs / dried seafood without obtaining any healthcare services from the EHCP.

Such act of claiming health care vouchers solely for buying medication or other items without provision of healthcare services is in breach of the Agreement.

Points to note

- Health care vouchers can only be used to settle the EHCP fees for the provision of healthcare services including preventive and curative services (e.g. Designated Services under the Reward Scheme) and rehabilitative services ^{Note (2)}.
- Health care vouchers shall not be used for solely buying drugs, Chinese medicines, spectacles, personal care products, food products or other items.

Example 3

An EHCP processed voucher claims with the total amount of vouchers used by the elderly person exceeding the EHCP fees for that episode of healthcare service (e.g. the charge for the consultation provided is HK\$130 but the EHCP deducted the voucher amount of HK\$350 for that claim). The EHCP explained that the excessively deducted voucher amount would be used for settling EHCP fees of subsequent consultations to the same elderly person as the elderly person visited him regularly.

Such act of using vouchers for settling the consultation fees in advance is in breach of the Agreement.

Points to note

- The amount of vouchers used by the voucher recipient shall not exceed the consultation fee (e.g. if the consultation fee is HK\$130, the amount of vouchers that can be deducted shall be HK\$130 or less with the remaining fee balance paid by the elderly person) ^{Note (3)}.
- Claims for use of vouchers shall only be based on individual episode of healthcare service provided.

Example 4

An EHCP claimed vouchers for elderly persons A and B. Investigation on the related transactions however revealed that elderly person A had not physically attended the practice of the EHCP to receive healthcare services. Instead, elderly person A told the EHCP his symptoms over the phone and asked his family member to obtain the medicine and use vouchers for him. For elderly person B, she had attended the clinic of the EHCP once for consultation and used voucher. After that, her relative attended the clinic of the EHCP and used her vouchers for obtaining medication. Investigation found that the vouchers were claimed without the notice of elderly person B.

Such act of claiming health care vouchers for a voucher recipient without the EHCP verifying his/her identity in physical presence with the voucher recipient is in breach of the Agreement.

Points to note

- In assisting an elderly person to use vouchers, the EHCP shall request the elderly person to produce his/her Hong Kong Identity Card or Certificate of Exemption for verification of his/her personal particulars ^{Note (4)}.
- Elderly persons using the vouchers shall receive the healthcare services in person provided by the EHCPs before they can use their vouchers to settle the relevant service fees. For medical laboratory technologists (MLTs) enrolled under the HCVS, it means that the relevant laboratory tests shall be performed by the enrolled MLT for the VR himself/ herself. Vouchers cannot be used to pay for those healthcare services received or medication obtained through voucher recipient's family member or his/her proxy.
- This is different from the scenario where an elderly couple has agreed to use their vouchers in each other's eHealth (Subsidies) Account that has been paired up when the vouchers in his/her own eHealth (Subsidies) Account has been exhausted.

Example 5

An EHCP had records of claiming vouchers on the days when he was on leave. Investigation revealed that the EHCP had allowed a leave relief service provider not yet enrolled in the HCVS to use his "EHCP account" in the eHealth System (Subsidies) on the days when he was on leave to claim vouchers for the healthcare services provided by the leave relief service provider to elderly persons.

Such act of allowing leave relief service providers, irrespective of whether they have been enrolled in the HCVS, to use one's "EHCP account" to make voucher claims for healthcare services not provided by him/her is in breach of the Agreement.

Points to note

- An EHCP should process voucher claims under his/her "EHCP account", and the concerned healthcare service must be directly delivered by him/her to the voucher recipient ^{Note (1)}.
- EHCPs should encourage the non-enrolled leave relief service providers to enroll in the HCVS. Upon successful enrolment, these leave relief service providers will be allocated their own "EHCP account" in the eHealth System (Subsidies) to process voucher claims.
- Details of the leave relief service providers, including the name and whether health care vouchers can be used, should be displayed in the clinic for the reference of voucher recipients.

Example 6

An EHCP made a voucher claim after he has provided healthcare service to an elderly person. While the charge for the consultation is \$250, the EHCP inadvertently deducted a voucher amount of \$520 for that claim. The EHCP later found that the claim amount was incorrect and agreed with the elderly person that \$270 overcharged voucher amount be refunded in cash to the elderly person.

Such act of redemption of vouchers for cash is in breach of the Agreement.

Points to note

- Vouchers cannot be redeemed for cash ^{Note (5)}.
- The EHCP should cancel the wrong voucher claim in the eHS(S) within 24 hours of confirming the claim.
- If the voucher claim was confirmed for more than 24 hours, the EHCP should submit a request to the Health Care Voucher Division as soon as possible for cancellation of the wrong claim together with the justification(s) and relevant supporting documents.

Note

(1) According to Clauses 23, and 29 to 31 of the Agreement, the healthcare service to a voucher recipient shall be provided by an EHCP. The EHCP shall log on his/her own EHCP account in the eHealth System (Subsidies) when assisting the voucher recipient to use vouchers to settle the EHCP fees for the healthcare services he/she provided.

(2) According to Clauses 28 to 30 of the Agreement, vouchers are to settle “EHCP fees” which is defined as the fees charged by an EHCP or his/her medical organization for the healthcare service provided by the EHCP to a voucher recipient.

(3) According to Clause 32 of the Agreement, vouchers are used to settle the EHCP fees after provision of healthcare service by the EHCP to the voucher recipient and the EHCP shall ensure that the total amount of vouchers used by a voucher recipient to settle the EHCP fees shall not exceed the amount of the EHCP fees.

(4) According to Clause 31 of the Agreement, in assisting the voucher recipient to use vouchers, the EHCP shall request the voucher recipient to produce his/her Hong Kong Identity Card or Certificate of Exemption for verification of personal particulars.

(5) According to Clause 43 of the Agreement, the EHCP and his Associated Organization shall not pay any voucher recipient whether directly or indirectly all or part of the amount paid or payable by the Government to the EHCP or the Associated Organization pursuant to the Agreement.