



Our Investment Our Health Our Future

Our Ref: cms/cbd/2015
12 October 2015

Dear Service Provider

RE: POLMED: PSYCHOLOGY OUT - OF - SCOPE CLAIMS

We refer to the above matter and wish to advise as follows:

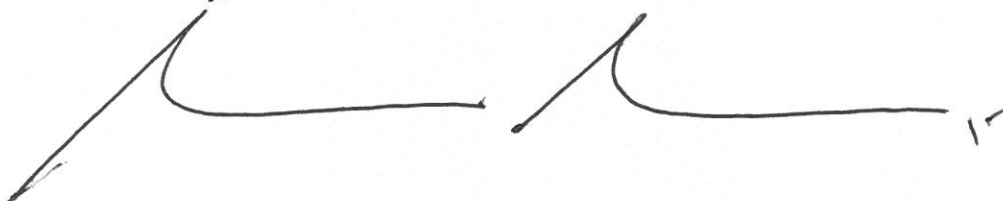
1. Polmed Fraud Risk and Forensics Division ("FRF") recently conducted a claims data analysis on all claims covering the Psychology discipline. Polmed FRF thereafter identified several areas of irregular claims submitted by psychology service providers relating to services falling outside the parameters of the psychologists' scope of practice.
2. In discussion with both the Council for Medical Schemes ("CMS") and the Health Professions Council of South Africa ("HPCSA") the following refers:
 - a. The Media Statement of the HPCSA entitled "HPCSA Clarifies Conflicting Reports on Scope of The Profession Of Psychology And Scope Of Practice Of Practitioners Of Psychology Profession" dated 15 June 2011 refers to the following regarding the scope of practice involving Psychologists: *"It is therefore important for all practitioners of the profession of psychology to note that the existing scope of practice as reflected in Form 224 is the one that is currently applicable."*
 - b. This is supported by the letter from Prof Sodi, Chairperson of the Professional Board for Psychology of the HPCSA; to Dr Patel dated 14 June 2011 refers. Here, it is stated, *"It is therefore important for all stakeholders, including the medical aid industry to be guided by the existing scope of practice (see Form 224 attached hereto)."*



- c. Form 224 of the HPCSA referred to by Prof Sodi above states the following:
- **Clinical Psychology** may “*assess, diagnose, and intervene in order to alleviate or contain relatively serious forms of psychological distress and psychopathology, or what is commonly referred to as “abnormal” behavior.*”
 - **Educational Psychology** may “*assess, diagnose and intervene in order to facilitate the psychological adjustment and development of children and adolescents within the contexts of family, school, social or peer groups and communities.*”
 - **Industrial Psychology** may “*apply the principles of psychology to issues related to the work situation of relatively well-adjusted adults in order to optimise individual, group and organisational well-being and effectiveness.*”
- d. Further, the “Practice Framework for Psychologists, Psychometrists, Registered Counsellors and Mental Health Assistants” published by the HPCSA 12 December 2008 refers that the Scope of Practice of Clinical Psychologists is defined as follows: “*Clinical psychologists assess, diagnose and intervene with people in dealing with life challenges, particularly those with relatively serious forms of psychological distress and/ or psychopathology,*” while the scope for Educational Psychologists and Industrial Psychologists ‘does not include the management of serious forms of psychological stress and/or psychopathology.
- e. The “Regulations defining the scope of the Profession of Psychology”, published in No.34581 Government Gazette, dated 02 September 2011 refers further that the scope of clinical psychologists are the “*assessing, diagnosing, and intervening in clients dealing with life challenges, particularly those with developmental and forms of psychological distress and/or psychopathology*” where once again the scope for Educational Psychologists and Industrial Psychologists does not include the management of serious forms of psychological distress and/or psychopathology.
3. Further, the ethical standards of the HPCSA clearly require “*informed consent*” by a patient should a Psychologist practice outside his/her scope of practice as the patient deserves information in this regard. Patients do not necessarily comprehend the scopes of practice of psychologists when the only notice they see is the board on the door which states “Psychologist”.

4. Polmed's interpretation is thus that Psychologists practicing outside their scope of practice are acting unethically. POLMED will thus from 01 November 2015 going forward not fund any services rendered to POLMED members by either Educational or Industrial psychologists.
5. We trust that the above is in order and that the matter has been clarified.

Yours truly,

A handwritten signature in black ink, consisting of a series of connected loops and a long horizontal stroke, followed by a small vertical tick mark at the end.

Mbasa Mxenge

Principal Officer