

# INTRAMURAL PROFESSIONAL PRACTICE POLICY AND PROCEDURE



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## 1 PURPOSE

- 1.1 This policy and procedure provides guidance on undertaking [intramural professional practice](#) within CQUniversity Health Clinics.

## 2 SCOPE

- 2.1 This policy and procedure applies to CQUniversity employees, within the School of Health, Medical and Applied Sciences, who are approved to engage in the delivery of clinical health services from within a CQUniversity-run clinic.
- 2.2 This policy and procedure does not apply to:
- employees wishing to undertake professional practice in settings other than a CQUniversity-run health clinic, or
  - non-clinical employees seeking to carry out activities in external settings.

## 3 POLICY STATEMENT

- 3.1 The University recognises the synergies of professional practice, teaching and research, and benefits that can be achieved through supporting the development of a strong community of clinical and professional academics.

- 3.2 As such, the University endorses and encourages employees with clinical expertise and registration to maintain and improve their expertise by becoming involved in either intramural professional practice or private practice within University-run clinics.
- 3.3 Intramural professional practice is available to approved employees who:
- need to maintain clinical/professional credentials, and
  - can contribute to the viable operation of a University-run health clinic through their professional practice.
- 3.4 A proportion of the practice fees collected in return for intramural professional practice services, and/or direct charges for the use of University health clinic facilities, will be payable to the University to cover costs incurred in supporting the professional practice. These percentages/charges will be determined by the University and in accordance with the principles outlined in [Appendix 1](#).
- 3.5 Intramural professional practice should be structured and delivered in a way that ensures practice fees payable to the University will cover all costs incurred by the University in supporting the professional practice. Should the University determine that an employee's intramural professional practice is not self-supporting, approval for the employee to conduct intramural professional practice will be reviewed and may be withdrawn.
- 3.6 Basic services will be provided by the University to support intramural professional practice. Basic services, and services outside of the scope of what will be provided by the University are listed in [Appendix 2](#).
- 3.7 Workload allocation for professional practice (including intramural professional practice) will be determined in consultation between the employee and the Dean School of Health, Medical and Applied Sciences.
- 3.8 Engagement in intramural professional practice will be acknowledged within the employee's work allocation. Intramural professional practice will normally constitute load for scholarship, research and/or service dependent on the nature of the practice undertaken, but will not normally incur a reduction in teaching load in the School, except where the professional practice is conducted within a teaching context involving scheduled student teaching activities (e.g., demonstrating clinical skills to students or supervising students undertaking clinical activities).
- 3.9 Intramural professional practice will not exceed 180 hours for a full-time appointee in a six month period, or proportionately less in the event that an employee is employed on a fractional basis.
- 3.10 Employees must undertake all work associated with their intramural professional practice in the time allocated, without detriment to their other workload requirements (including teaching, scholarship, research and service).
- 3.11 Intramural professional practice will be conducted to:
- be consistent with the mission and values of the University
  - deliver a demonstrable benefit to the University
  - develop and enhance the reputation and standing of the University, and
  - where practicable, contribute to the advancement of learning, research, scholarship and the clinical reputation of the University.
- 3.12 Intramural professional practice must only be undertaken by an employee who is:
- approved to practise by the Dean School of Health, Medical and Applied Sciences, and
  - a Physiotherapist registered with the Physiotherapy Board of Australia, Australian Health Practitioner Regulation Agency (AHPRA)
  - a Chiropractor registered with the Chiropractic Board of Australia, AHPRA
  - a Podiatrist registered with the Podiatry Board of Australia, AHPRA
  - a Speech Language Therapist, with acceptable qualifications, as approved by Speech Pathology Australia
  - an Occupational Therapist registered through Occupational Therapy Board of Australia, AHPRA

- appropriately authorised employees of who are registered as a Dental Practitioner registered with the Dental Board of Australia and AHPRA
- appropriately authorised employees of the School of Applied Psychology who are registered as a Psychologist with the Psychology Board of Australia, AHPRA.

3.13 Intramural professional practice will not compete with other University business, including the University's health clinic business. It will not affect the clinical activity or clinical supervision for the student led clinic.

## 4 PROCEDURE

### Administration and disbursement of income

- 4.1 Fees to be charged to patients/clients for treatment provided through intramural professional practice will be in accordance with the University Health Clinic's Fee Charging Procedure.
- 4.2 Once treatment fee schedules have been determined, the employee undertaking the intramural professional practice will ensure that processes are in place to accurately record treatment undertaken so that accurate fees can be calculated and subsequently charged to the patient/client.
- 4.3 Invoices will be generated from the Patient Management System (PMS) used within the clinic and there will be a reconciliation between the PMS Debtors and the General Ledger of the Finance Reporting System. Invoices will be issued under the University, however the individual employee's private provider number must be displayed on the invoice.
- 4.4 Costs will be recovered directly from the fees collected by the University from patients/clients before the disbursement of income to the employee occurs (in accordance with [Appendix 1](#)).
- 4.5 The University reserves the right to levy either an appropriate percentage of income generated by an employee's intramural professional practice and/or a flat fee per hour through which costs incurred by the University in supporting the intramural professional practice may be recovered.
- 4.6 Fees/charges recovered by the University will be determined by the University as indicated in [Appendix 1](#), taking into consideration the specific costs/overheads incurred by the University in supporting clinics, and the standards that apply to managing income for the discipline within similar clinical services external to the University.
- 4.7 In the event that insufficient income or no income (e.g., as a result of pro bono work or bad debts) is generated by an employee's intramural professional practice, the University will impose a charge on the employee to meet the costs incurred by the University.
- The Manager Health Clinic will determine, in accordance with [Appendix 1](#), the charges retained by the Clinic and host School to meet the costs associated with the professional practice incurred by the Clinic and host School.
  - The Manager Health Clinic will determine the charges that will be retained by the University to meet the costs associated with the professional practice incurred by the University.
  - Employees undertaking intramural professional practice must comply with any terms and conditions set by the Vice-President (Academic) with respect to charges levied to recover costs incurred by the University.
- 4.8 Employees undertaking intramural professional practice will abide by the decisions of the University with respect to percentages of practice fees/charges payable to the University.
- 4.9 Income collected by the University from intramural professional practice, after deductions have been made, may only be taken as salary at the time that it is disbursed by the University to the employee following the quarterly reconciliation of clinic finances.
- 4.10 Employees must ensure that any income taken as salary or collected directly from patients/clients is appropriately reported to the Australian Taxation Office for taxation purposes.

## **Insurance**

- 4.11 Employees must ensure that any insurance coverage obtained privately is up to date and a copy is provided to the University. It is recommended employees' insurance is valid as required for registration.

## **Process for approval of intramural professional practice**

- 4.12 A written application must be submitted regardless of whether the professional practice will be offered for payment or on a pro bono basis.
- 4.13 Applications will be considered for intramural professional practice on the following basis:
- suitability and viability of the proposed clinical service
  - suitability of the clinician to engage in clinical practice within the University's Health Clinic, and
  - the University's policy documents (e.g., Code of Conduct, Conflicts of Interest, etc.).
- 4.14 Applicants must submit a written application to the Manager Health Clinic. If endorsed, the Manager Health Clinic will forward to the Dean School of Health, Medical and Applied Sciences for approval.
- 4.15 The Dean School of Health, Medical and Applied Sciences will determine the extent (if any) to which intramural professional practice may be made available to employees within their School, taking into consideration employee and financial resource implications. If an application is approved, the Dean School of Health, Medical and Applied Sciences will forward to the Vice-President (Academic) for final approval.
- 4.16 Applicants will be notified in writing of the outcome of their application, including any limitations or conditions.
- 4.17 Approval may be given for up to three years at a time, though continued privileges are reviewed every two years.
- 4.18 At the conclusion of an approved term, the employee may reapply to undertake a further term of intramural professional practice through the same process outlined above.
- 4.19 The Dean School of Health, Medical and Applied Sciences will maintain a register of all approved requests for professional practice relating to employees within their School.
- 4.20 Subject to contractual conditions, the Dean School of Health, Medical and Applied Sciences or Vice-President (Academic) may at any time grant, refuse, reduce, suspend or withdraw an employee's right of intramural professional practice.

## **Performance management of intramural professional practice**

- 4.21 Employees approved to deliver intramural professional practice will report on their performance through the performance enhancement process under the workload category/s in which they have been approved to undertake the practice.
- 4.22 If an employee's intramural professional practice activities are deemed unsatisfactory by the Dean School of Health, Medical and Applied Sciences, the Dean School of Health, Medical and Applied Sciences or the Vice-President (Academic) may reduce or withdraw the approval for the employee to continue.
- 4.23 An annual statement outlining approved professional practice undertaken by employees in each School over each calendar year will be prepared by the Dean School of Health, Medical and Applied Sciences and submitted to the Vice-President (Academic) in November each year.

## **Dissatisfied patients/clients**

- 4.24 Any claims of dissatisfaction with the standard of treatment provided by an employee undertaking intramural professional practice will be reviewed in accordance with the relevant procedures and guidelines relating to patient or client complaints.
- 4.25 Complaints should be resolved either within the Clinic or the host School where possible.

- 4.26 In the event of a serious complaint or where a complaint is escalated it should be referred the Manager Health Clinic and the Dean School of Health, Medical and Applied Sciences.
- 4.27 The Dean School of Health, Medical and Applied Sciences or the Vice-President (Academic) may reduce, suspend or withdraw an employee from intramural professional practice during the review of a complaint from a dissatisfied patient/client. The employee involved must however continue to participate in the investigation and review of the complaint.

### **Leave and cessation of intramural professional practice**

- 4.28 Employees engaged in intramural professional practice should inform their supervisor, the relevant clinic lead and the clinic reception of any annual or other planned leave at least four weeks in advance of taking leave.
- 4.29 The employee will ensure that appropriate cover has been arranged for the ongoing management of their patients/clients during their absence.
- 4.30 In the event of unforeseen leave for sickness or emergency, the employee must inform the clinic reception as soon as is practicable in accordance with the relevant clinic procedures or guideline.
- 4.31 At completion of intramural professional practice, the employee must ensure that satisfactory arrangements are in place for the continuing care of patients/clients.

### **Practitioner responsibilities to meet and maintain pre-practice requirements**

- 4.32 Any employee wishing to practise in a University Health Clinic must hold and maintain evidence that they have met, and continue to meet, the pre-practice requirements determined by the Manager Health Clinic, including:
- provider/prescriber/registration/licensing details
  - professional qualifications
  - professional supervision arrangements
  - relevant and applicable certificates of insurance
  - immunisation status
  - first aid qualification
  - criminal record checks
  - evidence of compliance with continuing professional development requirements of the professional registering body, and
  - assurance that no conflict of interest applies with respect to the intramural professional practice and in accordance with the [Conflict of Interest Policy and Procedure](#).
- 4.33 Compliance with this policy and procedure is required as follows:
- follow occupational health and safety policy documents relating to work being undertaken in order to ensure high quality services and workplaces
  - deliver services appropriate to clients' needs and available resources using best practice guidelines; leading the provision and development of a safe competent health service
  - participate in the planning, development and review of policy documents in relation to the health clinic service
  - identify organisational issues, recommending change options and facilitating the implementation of change
  - undertake relevant duties as directed, consistent with skills and training
  - assist in health promotion activities within the clinic and community when the need arises
  - complete the University Health Clinic orientation

- all patients/clients of a University health clinic (or their legal guardian) will receive clear information about their treatment, options, risks, benefits, costs and likely outcomes so that they can make informed decisions about their care
- all patients/clients of a University health clinic will receive high quality and appropriate treatment which is delivered in accordance with accepted professional, ethical and service quality standards, and
- all patients/clients of a University health clinic (or their legal guardian) will have the opportunity to decline or consent to treatment free from coercion, and informed consent will be required from all patients/clients (or their legal guardian) for treatment provided.

- 4.34 The employee must be able to produce evidence that they hold current clearances with respect to pre-practice requirements, and must notify the Dean School of Health, Medical and Applied Sciences and the Manager Health Clinic if there are any changes in their status with respect to meeting or maintaining pre-practice requirements.
- 4.35 If there are changes in the status of an employee undertaking intramural professional practice which would impact the employee's ability to continue to practice, the Dean School of Health, Medical and Applied Sciences or the Vice-President (Academic) may reduce, suspend or withdraw the right to practice until the required pre-practice requirements have been obtained.

## 5 RESPONSIBILITIES

### Compliance, monitoring and review

- 5.1 The clinical service will be reviewed by the Manager Health Clinic every six months to ensure the viability, effectiveness and impact on current and future health clinic activities.
- 5.2 Clinical audits will be conducted as set by the Health Clinic Guidelines relevant to discipline.
- 5.3 The Dean School of Health, Medical and Applied Sciences and the Manager Health Clinic are responsible for implementing, monitoring, reviewing and ensuring compliance with this policy and procedure.

### Reporting

- 5.4 An annual report will be provided by the Manager Health Clinic to the Dean School of Health, Medical and Applied Sciences on the occasions of service, fees collected and completed audit schedule.

### Records management

- 5.5 Employees must manage records in accordance with the [Records Management Policy and Procedure](#). This includes retaining these records in a recognised University recordkeeping information system.
- 5.6 University records must be retained for the minimum periods specified in the relevant [Retention and Disposal Schedule](#). Before disposing of any records, approval must be sought from the Records and Privacy Team (email [records@cqu.edu.au](mailto:records@cqu.edu.au)).

## 6 DEFINITIONS

- 6.1 Terms not defined in this document may be in the University [glossary](#).

### Terms and definitions

**Intramural professional practice:** paid professional healthcare-related practice undertaken by approved CQUniversity employees, within a CQUniversity-run clinic or health service.

## 7 RELATED LEGISLATION AND DOCUMENTS

[Central Queensland University Enterprise Agreement 2017](#)

[Conflict of Interest Policy and Procedure](#)

## 8 FEEDBACK

8.1 Feedback about this document can be emailed to [policy@cqu.edu.au](mailto:policy@cqu.edu.au).

## 9 APPROVAL AND REVIEW DETAILS

Approval and Review	Details
Approval Authority	Vice-Chancellor and President
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Notes	

## 10 APPENDIX

### Appendix 1 - Income calculations

- 10.1 Employees granted rights of intramural professional practice will receive an agreed per cent of the net earnings from their own patient/client income earned from treatment provided within University Health Clinics. The remaining per cent will be retained by the University to cover costs incurred in supporting the professional practice. The fee is negotiable dependent on discipline and clinical activity.
- 10.2 Technical laboratory fees may be costed directly to a patient/client in addition to the standard fee schedule.
- 10.3 At the end of each quarter, the clinic administrator will reconcile all intramural professional practice receipts for that quarter and determine the appropriate amount to be paid to the relevant employee.
- 10.4 The clinician will reimburse the University at the end of each month for the rooms booked during the month.
- 10.5 The clinic administrator will reconcile all intramural professional practice room bookings at the end of each quarter, and ensure the appropriate amount was paid by the relevant employee to the University.

## Appendix 2 - Clinical facilities

10.6 Basic services that will be provided by the University to facilitate intramural professional practice include:

- access to approved clinic facilities/rooms
- access to University insurances, indemnity and medical malpractice
- limited reception services
- standard resources, equipment, facilities and consumables generally available within the University Health Clinics that are required to support the approved practice
- a dental assistant, in the case of dental intramural professional practice
- other standard services as deemed necessary by the Vice-President (Academic).

10.7 The list below specifies the services, outside of the scope of services, that will be provided by the University Health Clinics to support intramural professional practice or private practice clinic. The Manager Health Clinic may agree to supply the below services, however reserves the right to pass on the costs associated with the provision of the services to the practitioner through fees/charges over and above the standard fees and charges specified in this procedure:

- patient/client recruitment to support intramural professional practice or private practice clinics
- provision of personalised or specialised clinic stationery (e.g., referral pads) beyond the scope of the stationery normally supplied by the Health Clinic for use by clinicians
- medical typing services, including typing of correspondence to patients and clinicians related to intramural professional practice or private practice clinics. Clinicians wishing to access medical typing services may either:
  - source their own services external to the University, or
  - make arrangements for the University Health Clinic to procure the services of a medical typist on their behalf, the costs of which will be passed on in full to the clinician
- specialised resources, equipment, facilities and consumables which are not generally available within the University Health Clinic.

This list may be amended from time to time on the approval of the Vice-President (Academic).