

The Ontario Ministry of Health recommends against requiring doctor's notes to clear students and staff to return to school after suspected/confirmed cases of COVID-19. Some Public Health Units have also explicitly stated that individuals should not be required to provide documentation for mask exemptions in public spaces. Nevertheless, you may still receive patient requests for COVID-related clearances or exemptions as the province continues to open. This tool provides an overview of your professional obligations related to doctor's notes and identifies important context to consider as you respond to COVID-related requests. This tool will continue to be updated as the situation evolves.

It is the OMA's position that doctor's notes for clearance to return to work or school are not an appropriate use of primary care resources, especially while COVID-19 causes unprecedented strain on the health care system. We continue to monitor this issue and work on resources to support members.

## Professional Obligations Regarding Doctor's Notes

For **all** doctor's note requests, the usual guidance set out in the CPSO's [Third Party Reports policy](#) applies. Key points from the policy include:

### Treating physicians must:

- Provide reports (including notes) when requested
- Take steps to obtain and review all relevant clinical documentation
- Obtain and document patient consent

### The report (or note) must:

- Contain only necessary and relevant information
- Contain accurate information and state any limitations (whether due to availability of documentation, or because it is beyond your expertise/experience)
- State findings or opinions objectively and free from personal bias
- Note the source of information (if not individually substantiated)
- Use language and terminology appropriate for the audience

### The report (or note) should:

- Outline the basis for your professional opinion and the information or observations that you relied on to form your opinion

## Using Clinical Judgement

You will need to use your clinical judgement to assess the patient's condition and evaluate risk posed by their circumstances. Scientific and medical understanding of the risks posed by COVID-19 are rapidly evolving. This tool identifies sources to help you stay current in understanding the latest evidence and best practices that support the "standard of care" in regard to mask exemptions and medical support for accommodation or absence from work or school.

## Billing

Doctor's notes are not an insured service. Notes can be billed directly to the patient or to the third party (where they are the requestor).

The OMA Uninsured Services Guide (2020) provides two suggestions to determine a fee:

1. **A basic doctor's note: \$20**
  - This includes a short note that serves the purpose of briefly confirming an exemption (wearing a mask; attending work/school) or clearance to return to work/school.
2. **A doctor's note (or report), that requires a more detailed explanation about the patient's diagnosis, current capabilities and/or ongoing management:** There is no recommended fee for this service.
  - Members should determine a fee that is reasonable for the work involved and that considers each service independently.

When the assessment is not medically necessary, an additional appropriate assessment fee may be charged to the patient/third party on top of the fees charged for completing third party forms, reports and notes.

# Considerations for Specific COVID-Related Doctor's Note Requests

Request for Note	Physician's Role	Additional Information
<p><b>EXEMPTION</b> from wearing a mask</p>	<p><b>In public</b></p> <p>Evaluate the patient and use your clinical judgement to determine if the mask may present a medical risk to the individual.</p> <p><b>In the workplace</b></p> <p>Follow existing processes and paperwork for workplace accommodations in accordance with the Ontario Human Rights Code:</p> <ul style="list-style-type: none"> <li>• Complete paperwork provided by employer/insurer.</li> <li>• Evaluate the patient and consider their existing workplace conditions.</li> <li>• Use your clinical judgement to determine if the mask may present a medical risk to the patient.</li> </ul> <p>CPSO <a href="#">guidance</a> indicates that your role is to provide and attest to information about the patient's health care status or needs in support of a third party process. You are not required to determine the outcome of the process (i.e. how the patient should be accommodated).</p>	<p><a href="#">Government of Ontario</a>: The following people should not wear masks:</p> <ul style="list-style-type: none"> <li>• Children under the age of 2</li> <li>• Anyone who has trouble breathing</li> <li>• Anyone who is unconscious, incapacitated or otherwise unable to remove the mask without assistance</li> </ul> <p>The CPSO has also provided <a href="#">guidance on physician notes</a> related to COVID-19. It notes that generally there are limited circumstances that would qualify for a mask exemption and that general public health guidance on the matter broadly includes individuals who:</p> <ul style="list-style-type: none"> <li>• Have a medical, mental, or cognitive condition or disability that prevents them from wearing a mask, or a medical condition that makes it difficult to breathe;</li> <li>• Have a hearing impairment or work with those with a hearing impairment where the ability to see the mouth is essential for communication; or</li> <li>• Are unable to put on or remove a mask without assistance</li> </ul>
<p><b>EXEMPTION</b> from attending work</p>	<p>Follow existing processes and paperwork for workplace accommodations in accordance with the Ontario Human Rights Code:</p> <ul style="list-style-type: none"> <li>• Complete paperwork provided by employer/insurer.</li> <li>• Evaluate the patient and consider their existing workplace conditions. Use your clinical judgement to determine if the patient is at increased risk of severe illness from COVID-19.</li> </ul> <p>CPSO <a href="#">guidance</a> indicates that your role is to provide and attest to information about the patient's health care status or needs in support of a third party process. You are not required to determine the outcome of the process (i.e. how the patient should be accommodated).</p>	<p>The OCFP has collated <a href="#">advice from specialty groups</a> about medical conditions that put patient at high risk for severe illness from COVID.</p> <p>The CDC provides an <a href="#">overview of evidence</a> that certain medical conditions increase a person's risk of severe illness from COVID-19.</p>

Request for Note	Ministry of Health Clearance Guidance	Additional Information
<p><b>CLEARANCE</b> to leave isolation and return to work or school*</p>	<p><b>COVID-positive with symptoms</b></p> <p>The patient is considered clear 14 days after symptom onset, provided they are afebrile and symptoms are improving for at least 72 hours.</p>	<p>The <a href="#">Ontario Ministry of Health clearance guidance</a> advises that a time-based approach (rather than a test-based approach) to clearing cases is appropriate for all members of the general public and health care workers who have not required hospitalization.</p> <p>Confirmation of elapsed time can be obtained from time-stamped positive test results.</p> <p>Confirmation of negative test results can be obtained from the <a href="#">Ontario COVID-19 Test Results Portal</a> or directly from the institution that performed the test.</p>
	<p><b>COVID-positive without symptoms</b></p> <p>The patient is considered clear 14 days after specimen collection date (even if they had prior symptoms compatible with COVID-19).</p>	
	<p><b>COVID-negative with symptoms</b></p> <p>The patient is considered clear 24 hours after symptom resolution.</p>	
	<p><b>Not tested with symptoms</b></p> <p>The patient is considered clear 14 days after symptom onset, provided they are afebrile and symptoms are improving for at least 72 hours.</p>	
	<p><b>Confirmed case exposure</b></p> <p>The patient is considered clear after 14 days of self-isolation.</p>	
	<p><b>International travel</b></p> <p>The patient is considered clear after 14 days of self-isolation following return to Canada.</p>	

\* The Ministry of Health’s COVID-19 management and outbreak guidance for Public Health Units and School Boards recommends against requiring doctor’s notes to clear students and staff to return to school after suspected/confirmed cases of COVID-19. Nevertheless, you may still receive patient requests for COVID-related clearances or exemptions as the province continues to open.