

Guidance on Fees for Medical Reports and Records

Thank you for considering this request for patient records, reports or both. We appreciate your willingness to work with us to support our mutual client/patient.

We know that you care about your patients' health, and their health depends on receiving enough income to cover their basic needs. Your professional opinion often determines what benefits patients get.

As a legal clinic, we only offer services to those who live below the poverty line. Many of our clients survive on Ontario Works, which provides just over **\$700 per month** max. for a single person. Although our legal clinic may pay your invoice, **the client/patient is ultimately responsible for reimbursing our legal clinic.**

Your time is limited and valuable and we believe you should be compensated fairly for your work. The College of Physicians and Surgeons of Ontario (CPSO), the *Personal Health Information Protection Act* (PHIPA), and the decisions of the Information and Privacy Commissioner of Ontario provide guidance on balancing fair compensation with your patient's ability to pay.

Narrative Reports & Letters

When you set your fee for medical reports and letters, please consider the CPSO's guidance:

- Provide third-party medical reports in a timely manner, and no later than 45 days from the date of the request.ⁱ
- Ensure the fees you charge for uninsured services, including third-party medical reports, are reasonable.ⁱⁱ
- Consider the patient's ability to pay in determining fees.ⁱⁱⁱ
- Consider the financial burden that these fees might place on the patient and whether it would be appropriate to reduce, waive, or allow for flexibility based on financial need.^{iv}
- When the report relates to income or the necessities of life, it may be a financial burden for the patient to pay for the report, particularly if you require payment before they receive any benefits.^v

Patient Records

The CPSO, PHIPA and the Privacy Commissioner offer this guidance on fees for medical records:

- Patients have a right to access their own records under PHIPA^{vi}
- You can choose to waive any fees when that would be fair and equitable.^{vii}
- The fees you charge for patient records must cover only **"reasonable cost recovery"**, not full cost recovery.^{viii}
- You must provide an estimate of the total fee before charging the patient.^{ix}

What does reasonable cost recovery mean?

Decisions of the Privacy Commissioner are legally binding on health information custodians, including physicians.^x The Privacy Commissioner has set out the following rules in its decisions, which the Ontario Medical Association^{xi} recommends physicians follow to avoid complaints:

Hardcopy or electronic records	Cost
First 20 pages	\$30.00
After the first 20 pages	\$0.25 per page
Optional USB or CD for electronic records	\$10.00
If you need to review the records	
First 15 minutes of time to review records	\$30.00
Every 15 minutes afterwards (pro-rated)	\$45.00

ⁱ College of Physicians and Surgeons of Ontario, “[Third Party Medical Reports](#)” (Updated June 2021).

ⁱⁱ College of Physicians and Surgeons of Ontario, “[Uninsured Services: Billing and Block Fees](#)” (Updated May 2019), section 3. The CPSO considers it an act of professional misconduct to charge a fee that is excessive in relation to the services provided.

ⁱⁱⁱ “[Uninsured Services: Billing and Block Fees](#)”, section 4. The CPSO **requires** physicians to consider the patient’s ability to pay.

^{iv} “[Uninsured Services: Billing and Block Fees](#)”, section 4; “[Advice to the Profession: Uninsured Services](#)” (Updated May 2019)

^v College of Physicians and Surgeons of Ontario, “[Advice to the Profession: Third Party Medical Reports](#)” (Updated June 2022)

^{vi} College of Physicians and Surgeons of Ontario “[Medical Records Management](#)” (Updated June 2022), section 7; *Personal Health Information Protection Act*, section 52 (PHIPA).

^{vii} “[Medical Records Management](#)”, section 18.

^{viii} “[Medical Records Management](#)”, section 16; PHIPA, s. 54(11).

^{ix} “[Medical Records Management](#)”, section 15.

^x “[Medical Records Management](#)”, section 17; See Information and Privacy Commissioner Orders HO-009 and HO-14.

^{xi} Ontario Medical Association, “Physician’s Guide to Uninsured Services” (2025), pp. 16-18.