

**SUMMARY of the Decision of the Inquiries, Complaints and Reports Committee  
(the Committee)**  
(Information is available about the complaints process [here](#) and about the Committee [here](#))

**Dr. Shanza Waqar (CPSO #119997)  
(the Respondent)**

**INTRODUCTION**

The College received information from the Ministry of Health raising concerns about the Respondent's patient care and delegation to Physician Assistants (PA's). Subsequently, the Committee approved the Registrar's appointment of investigators to conduct a broad review of the Respondent's practice.

**COMMITTEE'S DECISION**

The Committee considered this matter at its meeting of February 26, 2025.

The Committee required the Respondent to appear before a Panel of the Committee to be cautioned with respect to her delegation of controlled acts, supervision of physician assistants and Ontario Health Insurance Plan (OHIP) billing practices.

The Committee also accepted an undertaking from the Respondent.

**COMMITTEE'S ANALYSIS**

As part of this investigation, the Registrar appointed an independent Assessor to review a number of the Respondent's patient charts, interview the Respondent, and submit a written report to the Committee.

The Assessor opined that the Respondent's clinical care was acceptable, and that the Respondent met the standard of the profession in this regard. The Assessor also opined that the Respondent's supervision of the PAs was also appropriate, and the role of the PAs was to the standard expected. With respect to the Respondent's OHIP billing, the Assessor identified some cases where the Respondent did not bill OHIP for services in accordance with the standard of practice. The Assessor opined that the Respondent displayed a lack of judgment regarding billing associated with the medical service provided. Finally, the Assessor opined that the Respondent's clinical practice, behaviour or conduct does not expose or is not likely to expose her patients to harm or injury.

The Committee accepted the Assessor's opinion with respect to the clinical care provided, however, it had concerns with the Respondent's delegation of controlled acts. The Committee noted that the medical directive at the clinic was far too broad and vague and did not adhere to the College's Policy on *Delegation of Controlled Acts*.

Further, the Committee noted that in many of the patient charts reviewed, delegation was occurring outside the context of a physician-patient relationship or anticipated physician patient relationship and occurring despite no clinical assessment being performed either prior to delegating or as soon as possible afterwards, which is also contrary to the policy. Additionally, the Committee noted that the Respondent had an obligation to establish competence of the PAs and provide ongoing monitoring and evaluation, and there was no indication that this was done. The Committee also had concerns with the medical record documentation, noting that progress notes were unclear with respect to the nature and involvement of the Respondent as opposed to the PAs, and identifying who performed the examination, prescribed medications or performed procedures.

The Committee also had concerns surrounding the Respondent's billing, noting that billings were submitted for patients that the Respondent had not seen. Additionally, the Committee was concerned that this continued even after the Respondent was sent a letter from the Ministry notifying her that services rendered by a PA, except for some procedures, were not delegable for OHIP payment purposes and must be personally rendered by the physician.

Additionally, the Committee noted its concern surrounding the Respondent's delegation of controlled acts within her scope of practice as an internist, noting that there are clinical concerns that arise in a walk-in-clinic setting that are outside the Respondent's scope of practice

The Committee determined that it would be appropriate to caution the Respondent based on the identified shortcomings in her delegation of controlled acts, supervision of PAs and OHIP billing practices.

*This is a summary of the Committee's decision as it relates to the caution disposition.*