



**ONTARIO CHIROPRACTIC ASSOCIATION
ASSOCIATION CHIROPATIQUE DE L'ONTARIO**

March 29, 2005

Ms. Rosemary Peros
Product Manager, Group Benefits, Product Marketing
Manulife Financial
380 Weber Street North, Box 1650
Waterloo, ON N2J 3G3

Dear Rosemary:

Re: Orthotics Industry Roundtable

We would like to thank you and your colleagues for hosting this event on February 28th. As an important and primary provider of health care services to millions of Canadians – and indeed, as a profession widely involved in the management of neuromusculoskeletal conditions through the use of orthotic appliances – chiropractic was happy to participate in this session.

We commend Manulife for taking a consultative approach to this issue, and we believe that this session was an important first step in addressing many of the issues surrounding the coverage of orthotics under private health care plans. We suggest this issue is likely of considerable importance to other insurers as well and we would be willing to work co-operatively with you, the CLHIA and others in bringing the matter to a larger table for additional dialogue.

In this regard, we offer the following observations and thoughts for your consideration.

The insurance industry appears to be grappling with two fundamental, but different issues. The first is prescription (who should prescribe orthotics) and dispensing (issues related to how orthotics are manufactured and sold). With respect to:

- Orthotics prescription: it is manifestly clear this is within the scope of chiropractic practice (education, training and diagnosis). We refer you to our submitted brief and the documents "Orthotics Prescription" and "Orthotics in Chiropractic Practice" for details.¹
- Orthotics dispensing: it is apparent that all represented regulated health care professions have appropriate guidelines in place to ensure appropriate and ethical behaviour on the part of their respective members.²

The suggestion has been raised that increased regulation of orthotics would address many of the insurance industry's concerns regarding orthotics dispensing. It is unlikely that government will support increased regulation in the current political environment given that that very few complaints have been registered with established regulatory bodies. In the same vein, it is difficult for the respective health care professions and professional colleges to understand and respond to insurers' concerns given the absence of formal complaints.

In light of the foregoing, we encourage Manulife, and indeed other health insurers, to:

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1. Enlist the co-operation and assistance of relevant health professional bodies by utilizing existing complaint mechanisms; and
2. Share information about suspected fraud with the respective health care professions, as all parties have a direct and vested interest in collaboration to eliminate questionable dispensing practices;
3. Stipulate contractually that only regulated health professionals be allowed to dispense orthotics; and
4. Work co-operatively with health professionals to ensure that orthotics manufacturers and laboratories adhere to appropriate standards and guidelines of conduct.

In further support of the above, I would like to reiterate our willingness to assist you directly as an Association when you have questions about specific circumstances or cases. As well, we would also be willing to assist should you see benefit from directly enlisting a chiropractor within your organization to assist you in internally dealing with claims issues and questions.

Finally, as you may know the OCA has been advocating for the health insurance industry to take a pan-professional approach to resolving many of the apparent problems and issues associated with orthotics dispensing. We hope that Manulife's initiative will serve as a model through which all insurers and health professions can collaboratively arrive at a framework that satisfies the interests of patients / plan members, plan sponsors, health care providers, and the insurance industry.

Rosemary, thank you again for organizing this roundtable. We look forward to continuing this dialogue.

Yours truly,



Eleanor White, DC
Chair, Extended Health Committee

Cc: Mr. H. James Duncan, The Canadian Chiropractic Association

¹ For an understanding of the biomechanical and other technical aspects of orthotics prescription, we refer you to the seminal research into orthotics conducted by:

- Benno Nigg of the Human Performance Laboratory, Faculty of Kinesiology, University of Calgary (<http://www.kin.ucalgary.ca/hpl/content/nigg.html>); and
- Anne Mündermann, Postdoctoral Research Fellow, Biomechanical Engineering Division, Mechanical Engineering Department, Stanford University (<http://www.stanford.edu/%7Eamuender/>).

² As a case in point, The College of Chiropractors of Ontario's *Orthotics Standard of Practice* can be accessed on the CCO web site at: http://www.cco.on.ca/standard_of_practice_s-012.htm.