

Issues Related to the Regulation of Chiropodists & Podiatrists

Chiropody & Podiatry Referral:
Additional Questions

August 2014

Health Professions Regulatory
Advisory Council



On behalf of the chiropody and podiatry professions, the Applicant (the College of Chiropodists of Ontario [COCOO]) is required to answer the standard questions listed in the Health Professions Regulatory Advisory Council (HPRAC) document titled *Review of a Professional Scope of Practice under the Regulated Health Professions Act, 1991 (RHPA), Application Guide*.

The Applicant is also required to answer the following additional questions, with evidence and data:

1. Describe which health care practitioners, both regulated and unregulated, are providing foot care (e.g., chiropodists, podiatrists, pedorthists, orthotists, nurses, personal support workers [PSWs], nail care technicians, etc.).
 - What activities, procedures and controlled acts are they performing?
 - How does the practice of other health care professionals overlap with the current and proposed chiropody/podiatry scope of practice?
 - Where overlaps occur, which health care practitioner would be the most appropriate practitioner to deliver the health care?
2. Is there a need to develop common foot care practice standards for all foot care practitioners? If so, why? How would this improve patient care? Who would participate in developing these standards? How would common practice standards fit in to an expanded scope of practice?
3. Provide descriptions of the most common routes to chiropody and podiatry treatment (e.g., referrals from family doctors, hospitals, walk-ins, etc.). How will a change in scope of practice affect access to foot-related health care?
4. How does confusion around the chiropody title impact patient care and outcomes?
5. Provide details on how the proposed change in scope of practice will impact the interprofessional collaboration (IPC) of foot care providers. Will it influence the integration of chiropodists and podiatrists into interdisciplinary health care teams? How will the patient be impacted?
6. Some stakeholders have advised of communication challenges between chiropodists/podiatrists and other health care providers such as family physicians. If chiropodists and podiatrists are granted the ability to order diagnostic procedures, would this potentially result in the duplication of diagnostic procedures by other health care professionals? Is there a need for the chiropodist/podiatrist to, for example, share these tests with the patient's family physician? What regulatory mechanisms, or other mechanisms, would the college establish in order to facilitate the sharing of information?
7. An expansion in scope of practice would likely require costly quality assurance and inspection programs and additional oversight obligations for the regulatory college. However, very large regulatory colleges do administer such oversight programs. Is it feasible for COCOO to establish similar programs? How much might such programs cost? How long would they take to be operational? How would COCOO fund them on a yearly basis? What would the impact be on individual members in terms of fees, staffing committees, etc.?
8. Please characterize how foot care services are reimbursed when different health professionals such as podiatrists, chiropodists, nurses, pedorthists, PSWs and others provide care. What percentage of

billings are paid by individuals, insurance companies, government? How will an expansion in scope of practice impact the payment for foot related health care? Would members of COCOO expect to have some or all of their services reimbursed by OHIP under an expanded scope of practice?

9. Through the initial consultation program, some stakeholders have highlighted the need for consumer protection measures related to the fitting of orthotics by many foot healthcare providers. If COCOO has data on related complaints and disciplinary findings, including the prescription and dispensing and fitting of orthotics, among its members, or among other foot health care providers, please share this data. How would a scope of practice change address this issue? What mitigating strategies can be implemented?
10. If HPRAC does not recommend a scope of practice change for the professions, what other changes could be made to improve the delivery of foot care in Ontario? For example how would improving IPC address the delivery of foot related health care?
11. During the initial consultation session on the model of foot care in Ontario, some stakeholders reported competition between foot health care providers and other challenges in the delivery of foot care in interdisciplinary settings. Competition between health care providers may compromise care and negatively impact patient safety and the patient. How would an expansion in the scope of practice address these challenge and benefit the public interest?
12. If possible, quantify the impact of the "podiatric cap" on access to care (e.g., wait times, etc.).
13. Describe in detail how and why the "podiatric cap" has stopped the profession from evolving.
14. What are the primary issues related to problems with patients accessing foot care: a lack of public funding, the podiatric cap, a lack of practitioners or other issues?
15. Demonstrate that Ontarians are having problems accessing the foot care that would be provided under an expanded scope of practice.
16. For foot care surgeries and other treatments that would be provided under an expanded scope of practice, demonstrate how the orthopaedic surgeons are not currently meeting the needs of Ontarians. Which treatments have significant wait times?
17. Do wait times differ for chiropodists and podiatrists? What are the wait times for each profession? Do wait times demonstrate that the public has problems with accessing foot care services that would be provided under an expanded scope of practice? Provide evidence.
18. If available, provide details on which educational institutions would develop and deliver bridging programs. How long would it take to develop these programs? What would be the cost of development and implementation?



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