



# PRACTICE ADVISORY SERVICES UPDATE

**Question:** I have been asked by a manager of a small healthcare facility about whether my clinic can provide a discount to staff working there. The healthcare facility provides some private health insurance coverage to its staff but is seeking additional discounts for custom Rx foot orthoses and other services we provide at our clinic.

**Answer:** These types of situations are not uncommon and may well be seen to be in good faith. However, offering discounts to certain patients/clients would be deemed to be “offside” the General Regulation and the COCOO Advertising Guideline, particularly these points:

- Anything that promotes or is likely to promote the excessive or unnecessary use of services.
- Members cannot include in any advertising anything that promotes or is likely to promote the excessive or unnecessary use of services.
- Unless otherwise specified, the advertised fee would be the maximum fee inclusive of all services, including laboratory costs. The advertised fee would be applicable to all patients, whether or not they were aware of the advertisement and whether or not they had insurance coverage.

**Question:** I am considering whether to professionally incorporate my business. What are the College requirements and regulations pertaining to incorporation?

**Answer:** All the documents required for professional incorporation can be found on the College’s website under the “Members” section:

<https://cocoo.on.ca/professional-corporations/>

An important consideration is that the College does not provide independent legal advice for such matters. We encourage members considering professional incorporation to seek suitably qualified, independent legal and financial advice as to their particular circumstances and the merits of undertaking such a venture.

**Question:** I am considering selling my practice in the near future, what are my obligations pertaining to the College’s Standards and Guidelines?

**Answer:** Undertaking the sale, or partial sale, of a practice is a very significant undertaking for any member, while adhering to the applicable Standards and Guidelines. In October 2020, the College Council approved the following Advisory which is posted under the “Publications and Resources” section of the COCOO website:

[https://www.cocoo.on.ca/pdf/guidelines/service\\_discontinuation.pdf](https://www.cocoo.on.ca/pdf/guidelines/service_discontinuation.pdf)



**College of  
Chiropodists  
of Ontario**

There are multiple considerations pertaining to Regulation and Standards including, but not limited to, Records, Professional Misconduct, Prescription Custom Footwear Standard and Code of Ethics. Members are encouraged to read the Advisory carefully, including all the relevant Standards, Guidelines and Advisories, and to contact the Practice Advisor for any additional guidance.

The Practice Advisor receives questions daily regarding all manner of practice related questions. Some can be answered simply, others can be quite challenging, while being a source of considerable angst to members.

We are here is to assist with your questions and provide sound and practical advice to ensure you stay “onside” with the regulations, legislation and standards.

Contact Peter Ferguson, Acting Practice Advisor at: [college@cocoo.on.ca](mailto:college@cocoo.on.ca) , or leave a message at: T: (416) 542-1333 or 1(877) 232-7653 Ex 228

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