



**College of
Chiropodists
of Ontario**

**PROFESSIONAL REGULATION
IN THE
PUBLIC INTEREST**

ANNUAL REPORT 2008

COLLEGE OF CHIROPODISTS

MISSION STATEMENT

The College of Chiropractors of Ontario regulates Chiropractors and Podiatrists in the public interest. The College ensures that the public receives competent care from Chiropractors and Podiatrists by:

- Regulating the practice of the profession and governing the members in accordance with the Chiropractic Act, the Regulated Health Professions Act and the regulations and by-laws
- Establishing standards of practice
- Establishing educational requirements for entry to practice and continuing competence
- Addressing concerns from the public

Educating and providing information to the public about Chiropractic and Podiatry

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College Council

President

Allen Frankel, Podiatrist

Vice President

Esrick Quintyn, Public Member

Elected Members

Sally Ciona, Chiropodist (until Sept. 2008)
Erin Fairbanks Chiropodist (from Sept. 2006)
Allen Frankel, Podiatrist (from Sept. 2003)
Anna Georgiou, Chiropodist (from Sept. 2004)
Robert Goldberg Podiatrist (from Sept 2006)
Colin McQuistan, Chiropodist (from 2007)
David Roth, Podiatrist (from Sept 2007)
Stephanie Shlemkevich Chiropodist (from Sept 2006)
Dennis Walsh Chiropodist (from Sept 2006)

Selected Councillors

Meera Narethiran, Chiropodist (from 2006)
1 Vacancy

Public Members

Sarma Donepudi (from 2006)
Sousan Eissabigloo (from 2006)
Ray Ferraro (from 2005)
Wilhelmina Gonzales (from 2005)
Esrick Quintyn (from 2006)

Non-Council Committee Members

Sarah Kerwin, Chiropodist
Sylvia Kovari, Chiropodist
Kim Resmer, Chiropodist
Giovanna Riolo, Chiropodist
Stuart Sackman, Podiatrist
Anamelva Revoredo, Chiropodist

College Staff

Registrar

Felecia Smith

Complaints Officer

Marilyn Bartlett

Executive Assistant and Membership Coordinator

Sharon Cole

College Advisors

Legal Counsel.....Alan Bromstein

Auditor.....Clarke Henning LLP

THE YEAR 2008 IN REVIEW

Joint Report from the President and Registrar

The College of Chiropractors of Ontario has an important role in regulating chiropractors and podiatrists in the public interest. This past year the College had an extremely busy and successful year as it prepared for anticipated future change and moved forward in improving its regulatory processes.

The College said good bye to Mr. David Greenberg and Mr. John Infanti whose terms with the College were complete. The College also bid farewell to public member Ms. Karen King. The College welcomed Mr. Colin McQuistan and Mr. David Roth. The College continued to work with its counterparts across Canada to finalize the AIT process. The American Podiatry schools, through the American Podiatric Medical Association, underwent an extensive program review which directly affected the AIT process. Once the podiatry program competency review was completed, the AIT Chair sought out and was granted further funding to continue the process.

After many years of hard work and determination, the 'drug regulation, being Part I of Regulation 203/94, passed. This was a tremendous milestone for the College. The College also approved a pharmacology course at the Michener Institute and the University of Toronto to assist members in upgrading their competencies to comply with the requirements of the drug regulation.

The College finally approved and adopted a new fees By-law. The College also amended its general by-law relating to electoral districts and podiatry members. The latter amendment stated that if, after a second call for nominations, no one comes forward, College Council will be able to appoint a podiatry member from anywhere in Ontario. It also amended other sections of the bylaw and approved in principle, amendments dealing with the *Health Systems Improvements Act*. The College amended its Standard of Practice dealing with Orthotics and recommended it for circulation to its members. It also met with representatives of the HARP commission in support of the Ontario Society of Chiropractors request for chiropractors to be able to prescribe x-rays.

In 2006, HPRAC was asked by the Minister of Health to "review issues relating to the regulation of chiropractic and podiatry and provide advice as to whether and how there should be changes to existing legislation regarding these related professions". The Minister also asked that the Council include "an analysis of the current model of foot care in Ontario, issues regarding restricted titles, and whether the existing limitations on the podiatrist class of members should continue." An ad-hoc committee of the College was established to assist College Council in formulating a response and providing information relating to the Minister's questions. This committee consists of professional Council members, those appointed by the Lieutenant Governor and representatives of the Ontario Podiatric Medical Association and the Ontario Society of Chiropractors. Council approved a document entitled "A Proposed Framework for the New Podiatry Model in Ontario" which will be the blueprint for change that will be presented to HPRAC at the time the review occurs. The College also hired a consultant to assist with the HPRAC referral process. At the invitation of the HPRAC Council, the College made a highly successful presentation to the HPRAC Board on June 21, 2008 at Niagara-on-the-Lake. The purpose of the

presentation was to help familiarize Board members with chiropractic and podiatry and the types of day-to-day issues encountered by members in their practices.

The registration examination working group continued to prepare the new registration examination for the College. The Committee is assisted by Dr. Dwight Harley, Director of Psychometrics Division of Studies in Medical Education at the Faculty of Medicine and Dentistry, University of Alberta to create a College registration examination. The work is anticipated to be completed by the end of 2010.

The College worked with the Ministry of Health and Long-Term Care, through the Health Human Resources and Modelling Unit, on the Allied Health Human Resources Database Pilot Project (ADHHRDB).

It has been a very busy but productive year and we look forward with anticipation to 2008.

Respectfully Submitted

Allen Frankel

EXECUTIVE COMMITTEE

Members

Allen Frankel (from September 2007) Chair

Ray Ferraro (from September 2008)

Anna Georgiou (from September 2007)

Robert Goldberg (until September 2008)

John Infanti (until September 2008)

Esrick Quintyn (from September 2008)

Stephanie Shlemkevich (from September 2008)

The Executive Committee (Committee) is a statutory committee that provides leadership to Council and makes decisions between Council meetings. It has all the powers of the Council with respect to any matter that in the Committee's opinion requires immediate attention, other than the powers to make, amend or revoke a regulation or by-law. The Registrar attends all Executive meetings.

During the year, the Committee continued to deal with matters that fell within the College's statutory objectives as outlined in the *Regulated Health Professions Act*. The Committee continued to work with the Ministry of Health and Long Term Care on finalizing the College's drug regulation.

The Committee reviewed a submission that had been made by the College to the Ministry of Health and Long Term Care many years ago. The submission dealt with diagnostic tests. The Committee felt that it was appropriate to review the earlier report and forward it to the Ontario Podiatric Medical Association and the Ontario Society of Chiropractors for comment. The Committee also began working with the Michener Institute and the University of Toronto to formulate a pharmacology course for those members who will require upgrading to meet the competencies in the drug regulation.

The Committee spent a great deal of time preparing the presentation to the HPRAC Board which took place on June 21, 2008.

The Committee referred two matters to discipline, closed one file and issued 2 Notice of Appointment.

QUALITY ASSURANCE COMMITTEE

Members

Anna Georgiou, Chiropractor (Chair)
Wilhelmina Gonzales, Public Member
Sarma Donepudi, Public Member
Stuart Sackman, Podiatrist
Meera Narenthiran, Chiropractor

The primary objective of the Quality Assurance Program is to provide members of the College of Chiropractors of Ontario with the opportunity to enhance their knowledge base and clinical skills so as to encourage excellence in the delivery of foot care to the public.

The following reflects the work of the committee during 2008:

Continuing Education Program

CE Log Program

The Committee completed the first phase of their review for those members randomly selected to participate in the 2006-2007 continuing education program. Some members initially failed to file some of the required information with the College and therefore additional information and follow-up was required with these particular members. However, after many meetings, discussion and review of materials, all members were found to be satisfactory. As required under the College's QA regulation, a practice assessment maybe initiated for these members if they ultimately do not fulfill the minimum requirements for continuing education.

Self-Assessment Tool

Members are required to complete a minimum of one self-assessment during each CE cycle and retain the completed Self Assessment Tool in their files. O.Reg. 203/94 s.29. (1) says: "A member shall maintain a record of his or her self-assessments and continuing education activities, and submit them to the College upon request."

Declaration of Completion

Members of the College are required to execute a Declaration of Completion on the Member's Annual Renewal form which states that "I have reviewed my practice and completed the Quality Assurance Self-Assessment Tool. I have created a plan to address the continued professional developmental objectives I have identified in this Self-Assessment Tool. I understand that I must retain the completed Self-Assessment Tool and Continuing Education log in my files".

Practice Assessment Program

Mandatory Practice Assessment

There was one carry over mandatory assessment that continued into the 2008 fiscal year. This assessment related to a member's failure to file their CE logs. A re-assessment of this member's practice was conducted as a result of deficiencies observed during the initial assessment and a report was finalized and the member's file closed.

Random Practice Assessments

A roster of members from across the province have been selected as practice assessors and have completed training which will allow them to act as practice assessors for the random practice assessment program. The practice assessment tools and check lists were reviewed and updated. One percent of the membership was randomly selected to participate in the random practice assessments which continued throughout the year. When the assessors completed their reports, the QA committee reviewed them and determined what, if any next steps were required.

Standards of Practice Revision

The Orthotics Standard of Practice was amended and approved, in principle, by Council at the September 2008 meeting. The draft Standard will be circulated for comment.

Referrals from Complaints Committee

There was one new referral to the QA committee from Complaints COommittee. The assessment of the member's practice was completed, the report reviewed by the QA committee and the file closed.

Quality Assurance Working Group

The chair of the QA committee continues to participate in the working group with QA representatives from all the regulated health professions. This includes a review of each College's QA program and the sharing of information.

COMPLAINTS COMMITTEE

Members

Sally Ciona, Chiropractor, Chair

Sarma Donepudi, Public Member (from September 2008)

Robert Goldberg (from September 2008)

David Greenberg, Podiatrist (until September 2008)

Esrick Quintyn, Public Member (from Oct /07)

David Simard, Chiropractor

Marilyn Bartlett, Complaints Officer

The mandate of the Complaints Committee is to investigate and consider complaints filed with the Registrar regarding the conduct of a member of the College. The responsibility of the committee is to conduct a thorough investigation and review of all records and documents relevant to a complaint and determine an appropriate action according to the RHPA, 1991.

In 2008, a total of 13 complaints were received. The Complaints Committee met seven times and reviewed and made decisions for seven complaints.

The Complaints Committee noted some common themes while reviewing the complaints submitted to the College.

In particular the Committee reminds members of the need to:

- Ensure that information and billing submitted to insurance companies is correct and accurate, and to discontinue providing free footwear.
- Effectively communicate with clients in regards to all treatment and billing practices.
- Maintain appropriate boundaries with clients.

The Complaints Committee reminds members that the number of complaints received and investigated, contributes to the College's overall operational costs, which ultimately affects membership fees.

The following table outlines the number of complaints received by the College over the past 6 years:

2004	10 complaints
2005	10 complaints
2006	10 complaints
2007	13 complaints
2008	13 complaints

Committee Activity during the past year:

	2006	2007	2008
Total complaints received in the calendar year	12	13	13
Complaints resolved in the calendar year	4	6	13
Carried forward to the next calendar year.	8	7	6
How the complaints were resolved for each calendar	<i>Complaints resolved in 2006:</i> 2 closed with a referral to QA 2 closed- No action.	<i>Cases resolved in 2007 pending from 2006:</i> 1 closed with written caution 3 closed- no action. 1 closed with advice	<i>Cases resolved in 2008 pending from 2007:</i> 2 referred to QA 2 closed 3 closed with advice

year.	As of May/07, 6 additional cases resolved: 1 closed with written caution 4 closed- no action 1 closed – referral to QA Two cases with decisions still pending 1 case from 2006 appealed to HPARB.	1 closed – referral to QA 1 case from 2006 was appealed to HPARB and HPARB upheld the College's decision. Complaints resolved in 2007: 2 closed with no action [1 under appeal to HPARB]. 1 closed - oral caution 3 referred to Discipline 7 matters outstanding to be dealt with in 2008	Cases resolved in 2008: 2 referred to QA 1 closed with undertaking 2 closed with advice 3 closed no action
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DISCIPLINE COMMITTEE

Members

Allen Frankel, Podiatrist (Chair)

Sarma Donepudi, Public Member

Susan Eissabigloo, Public Member (from September 2007)

Ray Ferraro, Public Member

Wilhelmina Gonzales, Public Member (from September 2007)

Sarah Kerwin, Chiropractor, non-Council

Meera Narenthiran, Chiropractor (until September 2008)

Esrick Quintyn, Public Member (until September 2007)

The Discipline Committee is a statutory committee under the *Regulated Health Professions Act*.

The Discipline Committee holds hearings into allegations of a member's professional misconduct or incompetence which has been referred to the Committee by the Executive or Complaints Committees. If a panel of the Discipline Committee finds a member has committed an act of professional misconduct it may make orders doing any or more of the following:

- Directing the Registrar to revoke or suspend a member's certificate of registration or to impose terms, conditions and limitations on the member's certificate of registration;
- Requiring the member to appear before the Committee to be reprimanded;
- Requiring the member to pay a fine not exceeding \$35,000.00 to the Minister of Finance
- Requiring a member to pay all or a portion of the College's costs related to the matter brought before the discipline committee.

Matters Dealt with in 2008**A.****Marzena Hardy**

This matter came before a panel of the Discipline Committee ("Panel") at a Hearing which was held on June 5, 2008. Ms. Hardy was present but was not represented by legal counsel. Her husband, Mr. John Hardy, was present to provide support. A Notice of Hearing dated February 15, 2008 containing a Statement of Allegations and an Affidavit of Service sworn the 3rd day of March, 2008 were filed together as Exhibit No. 1. A Statement of Agreed Facts was filed on the consent of both parties as Exhibit No. 2. It contained the following agreed upon facts:

"1 Ms. Marzena Hardy is a chiropractor duly registered in Ontario.

2 At all material times, Ms. Hardy worked at Academy Chiropractic Clinics in Toronto, Ontario.

Insurance Claim for Mr. W

3. In or about April, 2006, Ms. Hardy submitted, or permitted to be submitted, a claim form for orthotics to Manulife Financial related to Mr. W. The claim form was dated April 13, 2006, and was signed by Mr. W.

4. Mr. W. had originally attended at Academy Chiropractic Clinics in 2004 for the purpose of obtaining orthotics. At that time he was asked to sign a blank claim form to be used for his 2005 orthotics benefit.

5. Mr. W. did not attend at Academy Chiropractic Clinics in 2006 and was not seen by Ms. Hardy prior to the completed claim form being submitted to Manulife Financial in April, 2006.

6. It is alleged that the claim form submitted to Manulife Financial in April 2006 was the claim form originally signed by Mr. W. in 2004 when it was blank.

7. Attached to the claim form when it was submitted to Manulife financial was a handwritten receipt dated April 13, 2006, indicating that \$575.00 had been paid by Mr. W. for the orthotics and a computer generated statement of account in Ms. Hardy's name indicating that \$575.00 had been paid by Mr. W. on April 13, 2006. In fact, Mr. W. did not pay Ms. Hardy or Academy Chiropractic Clinics for any orthotics in April 2006.

8. Attached to the claim form was also a referral letter in Ms. Hardy's name dated April 13, 2006. The referral letter states "the orthotic devices have been dispensed to the patient today." In fact Mr. W. did not receive any orthotics from Academy Chiropractic Clinics or from Ms. Hardy on April 13, 2006, or at any time in April 2006.

9. It is agreed that the above conduct constitutes professional misconduct pursuant to paragraph 20 (signing or issuing a document that contains a false or misleading statement of section 1 of Ontario Regulation 750/93, as amended, under the *Chiropractic Act, 1991*.

Insurance Claim for Ms. B.

10. On or about January 24, 2007, Ms. B. attended at Academy Chiropractic Clinics for the purposes of obtaining orthotics. Ms. B's husband wrote a cheque dated January 24, 2007, to Academy Clinics for \$575.00 for the payment of the orthotics. That cheque was not processed until March 2007.

11. Ms. Hardy submitted, or permitted to be submitted, to Manulife Financial on or about January 24, 2007, a claim form for orthotics for Ms. B. An invoice in Ms. Hardy's name accompanying the claim form (sic) indicated that the orthotics had been paid in full on January 24, 2007, when that was not the case.

12. An authorization form for prosthetic appliances that accompanied the claim was in Ms. Hardy's name despite the fact that Ms. Hardy did not assess Ms. B.

13. A referral form in Ms. Hardy's name accompanied the claim form and indicated that orthotics were dispensed to Ms. B. on January 24, 2007. In fact the orthotics were not dispensed to Ms. B. until on or about March 5, 2007.

14. It is agreed that the above conduct constitutes professional misconduct pursuant to paragraph 20 (signing or issuing a document that contains a false or misleading statement) of section 1 of Ontario Regulation 750/93, as amended, under the *Chiropody Act, 1991*.

Free Shoes Provided to Ms. B.

15. Ms. B. was also given a free pair of shoes with the orthotics that she received in March of 2007. None of the documentation in Ms. Hardy's name that was submitted to Manulife Financial by Ms. Hardy or Academy Chiropody Clinics indicated that shoes had been provided to Ms. B.

16. It is agreed that the above conduct constitutes professional misconduct pursuant to paragraph 21 (submitting an account or charge for services that the member knows is false or misleading) of section 1 of Ontario Regulation 750/93, as amended, under the *Chiropody Act, 1991*."

DECISION ON FINDING OF PROFESSIONAL MISCONDUCT

The Panel was satisfied that the conduct described in paragraphs 3 to 9 of the Statement of Agreed Facts (Insurance Claim for Mr. W.) and the conduct described in paragraphs 10 to 14 of the said Statement (Insurance Claim for Ms. B.) constituted professional misconduct as defined by paragraph 20 (signing or issuing a document that contains a false or misleading statement) of section 1 of Ontario Regulation 750/93, as amended under the *Chiropody Act, 1991*.

The Panel was satisfied that Ms. Hardy had committed professional misconduct described in the Statement of Agreed Facts (as amended) and therefore found that Ms. Hardy had committed acts of professional misconduct as set out therein.

JOINT SUBMISSION ON PENALTY AND COSTS

The parties filed a Joint Submission on Penalty and Costs, which was marked as Exhibit No. 3. The Joint Submission suggested that the following penalty and costs would be appropriate in the circumstances of this case:

1. Ms. Hardy will appear before a panel of the Discipline Committee to be reprimanded, the fact of which shall appear on the College register.
2. Ms. Hardy's certificate of registration will be suspended for two (2) months, on a date to be set by the Registrar.
3. Two (2) weeks of the suspension referred to in section 2 herein will themselves be suspended if Ms. Hardy successfully completes at her expense an ethics course and a jurisprudence course (or one course combining both subjects) acceptable to the Registrar, within six (6) months of the date the discipline panel's order becomes final. If Ms. Hardy fails to successfully complete the course or courses within the deadline, then the remaining two (2) weeks suspension will be served immediately thereon.
4. There will be a term, condition and limitation on Ms. Hardy's certificate of registration requiring her to submit to monitoring of her practice for a period of one(1) year, to begin after the completion of the suspension referred to in section 2 herein. This monitoring will be at Ms. Hardy's expense and will involve no more than two (2) visits by the monitor.

5. The term, condition or limitation set out in section 4 herein will be removed from Ms. Hardy's certificate of registration once the Registrar is satisfied that it has been fulfilled.

6. Ms. Hardy will be ordered to pay to the College a portion of its costs in the matter in the amount of \$3,000.00 to be paid in full in twelve (12) equal and consecutive monthly instalments of \$250.00, beginning no later than the 15th day of the first month after the conclusion of the suspension referred to in section 2 herein.

B.

Mr. Cornelius Gufca

The panel of the Discipline Committee ("Panel") convened on September 11, 2008 to hear allegations brought by the College against Mr. Gufca. Mr. Gufca was not present at the hearing nor was he represented by legal counsel.

DECISION ON FINDING, PENALTY AND COSTS

Having heard and considered all of the evidence, the Discipline Committee found Mr. Gufca guilty of professional misconduct as defined under each of:

- (a) Paragraph 8 (discontinuing professional services);
 - (b) Paragraph 12 (breaching an agreement with a patient);
 - (c) Paragraph 18 (falsifying a record relating to the member's practice);
 - (d) Paragraph 19 (failing to provide a report or certificate);
 - (e) Paragraph 20 (signing or issuing a false or misleading document);
 - (f) Paragraph 33 (disgraceful, dishonourable or unprofessional conduct);
 - (g) Paragraph 34 (failing to reply to written enquiry from College);
- of section 1 of O. Reg. 750/93 as amended, under the *Chiropractic Act, 1991*.

Penalty

The Panel ordered that Mr. Gufca's Certificate of Registration be revoked immediately.

Costs

The Panel determined that this was an appropriate case to order costs and the Panel ordered Mr. Gufca to pay \$14,000.00 to the College to partially reimburse it for its legal costs and expenses, the costs and expenses incurred in investigating the matter, and the costs and expenses incurred in conducting the Hearing.

REGISTRATION COMMITTEE

Members

Sarma Donepudi, Public Member (from September 2007)

Esrick Quintyn, Public Member (from September 2008)

David Roth, Podiatrist (from September 2008)

Dennis Walsh, Chiropractor (from September 2007)

Mandate

The Registration Committee is a statutory committee under the *Regulated Health Professions Act, 1991* with the mandate to consider referrals from the Registrar relating to applications for a certificate of registration. After considering an application for registration the Committee may direct the Registrar to:

- Issue a certificate of registration

- Issue a certificate of registration if the applicant successfully completes examinations set or approved by the Committee.
- Issue a certificate of registration if the applicant successfully completes additional training specified by the Committee.
- Impose specified terms, conditions and limitations on a certificate of registration of the applicant and specify a limitation on the applicant's right to apply for an order removing or modifying any term, condition or limitation imposed on a member's certificate of registration as a result of a committee proceeding, and/or
- Refuse to issue a certificate of registration.

The Committee also considers members' applications for an order removing or modifying any term, condition or limitation imposed on a member's certificate of registration as a result of a Committee proceeding.

Applications for Registration

The Registrar referred two applicants to the Registration Committee pursuant to section 15(1) b of the *Regulated Health Professions Act*, 1991. The reason for the referral was because the applicants did not graduate from a recognized chiroprody program and did not have the appropriate authority under the Immigration and Refugee Protection Act (Canada) to practice the profession in Canada. With one matter, the Committee directed the Registrar to write a letter to the applicant and advise the applicant of the Committee's decision to defer the application until further review of the application. With respect to the second candidate, the Committee determined that the applicant was eligible to attempt the examination, although the committee was not satisfied that the Applicant met the requirement of paragraph 5 of subsection 4(1) namely that she was a Canadian citizen, a permanent resident of Canada or authorized under the Immigration Act (Canada) to practise the profession of chiroprody in Canada. The Committee was satisfied that under the circumstances it would exempt the Applicant from the requirement. The panel indicated that its decision was to be valid until July 31, 2009 to allow the Applicant sufficient time to successfully complete the non-exemptible examination.

College Registration Examination

In 2007, the College Council appointed a Registration Examination Committee whose task it is to prepare an independent College registration examination. The College hired Dr. Dwight Harley, an Adjunct Associate Professor and Director of the Psychometrics Division of Study in Medical Education, Faculty of Medicine and Dentistry at the University of Alberta, to assist with the process.

PATIENT RELATIONS

Members

Erin Fairbanks, Chiropractist

Ray Ferraro, Public Member (until September 2008)

Sylvia Kovari, Chiropractist, non-Council

Sousan Eissabigloo, Public Member (from September 2007)

The Patient Relations Committee is a statutory committee under the provisions of the *Regulated Health Professions Act*, 1991. The role of the Committee is to advise Council regarding the College Patient Relations Program. The Patient Relations Program must include measures for prevention and dealing with abuse of patients. These measures must include:

- Educational requirements for members;
- Guidelines for the conduct of members with their patients;
- Education of College Council and staff; and
- The provision of information to the public.

The Patient Relations Committee also administers the College program on the maintenance and administration of a fund for therapy and counseling for persons, who while patients, were sexually abused by members.

FITNESS TO PRACTICE COMMITTEE

Members

Stephanie Shlemkevich, Chiropractor (from September 2006)

Colin McQuistan, Chiropractor (from September 2008)

Esrick Quintyn, Public Member (from September 2006)

Kim Resmer, Chiropractor, non-Council (from September 2006)

The Fitness to Practice Committee is a statutory committee. The Committee holds hearings relating to a member's incapacity that has been referred to the Committee by the Executive Committee. If the Committee finds that a member is incapacitated, it must make an order directing the Registrar to do any one or more of the following:

- Revoke the member's certificate of registration.
- Suspend the member's certificate of registration.
- Impose terms, conditions and limitations on the member's certificate of registration.

There were no matters brought before the Fitness to Practice Committee in 2007.

COLLEGE OF CHIROPODISTS OF ONTARIO

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