



PRACTICE ADVISORY SERVICES UPDATE

The Practice Advisor's role is to assist members with challenges in their clinical practice who require guidance, particularly with respect to the COCOO standards, guidelines and policies. Additionally, the practice advisor responds to queries from stakeholders, including, but not limited to, members of the public or their caregivers, other regulated healthcare professionals (for example, pharmacists, physicians, and RNs), other regulated health colleges (for example, College of Nurses of Ontario), clinic managers and third-party health insurance providers. In responding to the wide range of inquiries, the Practice Advisor relies on the governing legislation. As required, the Practice Advisor may consult with staff or legal counsel to ensure that any advice is as complete as possible and consistent with the College's governing legislation.

When a member contacts the Practice Advisor for guidance, if the Practice Advisor consults with other staff or externally, the member's name and information are kept confidential. The Practice Advisor is not permitted to provide legal advice on matters such as employer-employee disputes or other obligations on a member as an employer. Members will be advised to seek independent legal counsel when seeking legal advice as distinct from practice advice.

The practice advisory services can be accessed at:

practice@cocoo.on.ca

Local (416) 542-1333 or Toll-free 1 (877) 232-7653 Ext. 230

The following advisories are provided in response to member and stakeholder inquiries, requests for clarification and/or guidance received by the Practice Advisor.

Health Canada Advisory – Lasers to Treat Fungal Nail Infections

It has recently come to the attention of the College that some members are advertising and recommending to their patients the use of lasers to treat fungal nail infections in a manner that is contrary to the Advisory provided by the College on this matter and circulated in the [August 2019 Footprint newsletter](#).

The following Advisory was produced based on the July 2019 Health Canada issued health alert.

<https://recalls-rappels.canada.ca/en/alert-recall/health-canada-clarification-laser-based-medical-devices-are-not-licensed-canada-cure>

“Health Canada is clarifying that, while some laser-based medical devices are licensed in Canada to temporarily increase the clarity of the nail in patients with a fungal nail infection, none have been licensed to cure these infections.”



Accordingly, the College is advising its members that in their communications with their patients considering any such treatments, they should only make claims as to outcomes consistent with this Advisory to ensure not to promise or promote any results beyond what is stated in the Advisory. Additionally, it is advisable that members consider, and have ruled out, all other differential diagnoses before recommending treatment for suspected fungal nail infections (onychomycosis) with this modality.

“Medical Pedicures”

The College recently received a question about offering the services of pedicurists and subsequently invoicing for chiropody or podiatry treatments to insurance companies. The proposed scenario would be that a client is “assessed” before each treatment by the member, and then the services are performed by the pedicurist. Any nail polish application or other purely cosmetic undertaking would not be included as part of the insurance claim submitted. The proposed benefit to the patient in having a pedicure at a chiropody or podiatry clinic was that they receive treatment with sterilized instruments, therefore minimizing the potential for cross-infection through instrumentation. The question presented to the College was, is this practice arrangement permitted?

Traditionally, pedicurists provide their services in practice settings under the Department of Public Health's oversight as it pertains to cleanliness and infection control requirements. Their services are not covered by third-party insurance providers.

The College provided an Advisory on this matter in the November 2021 Footprint newsletter. The College's position remains that members should only bill for services they personally perform, and those services should be for conditions that are medically necessary. Since the treatments performed in these practice scenarios are by pedicurists, they are not deemed to be medically necessary. Additionally, since the pedicurists are providing care for things that they traditionally perform on their own, no “oversight” by a member is required or justifiable. The membership should be concerned that insurers may interpret such practice scenarios as a means of fraudulent billing practices for services that are not medically necessary. This could lead to an investigation by insurers and a subsequent complaint to the College.

Member Insurance Claim Forms and Billing Documents – Identifying Class of Registration

The College continues to be contacted by representatives from the insurance industry relating to confusion around members' claim forms and billing documents submitted to insurers for services rendered. The College reminds members, that it is incumbent upon them to ensure that they have clearly identified their class of registration, chiropodist, or podiatrist, as part of any and all documents provided to patients, or submitted directly to third-party insurance providers, in order to fully comply with the College's legislation, standards and guidelines.



Membership Practice Survey

The College is in the process of compiling and interpreting the data collected from the practice survey. To protect the public in respect of the provision of chiroprody and podiatry services and treatments, it is necessary for the College to know the services and treatments that members are providing to the public. The data collected has already proven to be very helpful in fulfilling the College's mandate to serve the public. For example, since the practice data collected is correlated to a specific practice location, when contacted by a member of the public or their caregiver seeking a given treatment, the College is now able to direct those individuals to members in their geographic region who offer such a service. Additionally, having at hand data specific to the services provided at a given practice location will allow for more meaningful and effective Practice Assessments by the College and education tools for members as part of the Quality Assurance Program.

Moreover, the data collected will allow us to respond to questions from stakeholders relating to the services our members provide with greater accuracy and validity. Further refinements will be made to future iterations of the survey as required. In time, once the College software is upgraded appropriately, this survey will be offered more seamlessly as part of the annual registration renewal. Thank you for the feedback received.

Contact Peter Stavropoulos, Acting Practice Advisor, at practice@cocoo.on.ca, or leave a message at (416) 542-1333 or 1(877) 232-7653 at extension 230.

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