ZERO TOLERANCE POLICY STATEMENT

Approved by the Executive Committee: May 10, 2019



180 Dundas St. West, Suite 1901 Toronto, ON M5G 1Z8 T: 416.542.1333 F: 416.542.1666 Toll-Free: 1.877.232.7653 www.cocoo.on.ca "Honesty and integrity are fundamental attributes for every member of this College. As a result, the College has adopted a zero tolerance policy towards inappropriate business practices."

Background

As a result of increasing trends related to inappropriate business practices by members of the College, Council believes that protecting the public and the reputation of the profession demands the elimination of these inappropriate practices. As such, a policy statement has been approved to inform Members and the public unequivocally where the College stands on this issue.

What are inappropriate business practices?

Inappropriate business practices can take many forms, but examples could include:

- Offering incentives (e.g. free and/or discounted shoes with the purchase of orthotics);
- Over-prescribing medical products and/or orthotics for your own financial benefit;
- Not fitting and dispensing orthotics prescribed by you (or, where you are unable to dispense orthotics to the patient, not arranging for another Member to fit and dispense the orthotics to the patient);
- Signing or issuing a document that contains a false or misleading statement, or falsifying records (e.g. fraudulent completion of insurance forms, signing a prescription having not seen and/or assessed a patient);
- Practising the profession while you are in a conflict of interest (e.g. using an orthotic lab
 for which you are also a shareholder/consultant/staff member, and not disclosing that
 conflict to the patient and to the College);
- Submitting an account or charge for services that is false or misleading (e.g. issuing an invoice and/or insurance claim for more than what the patient was actually charged or for treatment or products were not actually provided);
- Charging a fee that is excessive in relation to the services or devices charged for (e.g. charging excessive fees for temporary pads or shoe modifications);
- "Cash-splitting" schemes (i.e. submitting a claim for services not provided to the patient, and splitting the insurance payment with the patient/plan member); and,
- Many more...

By taking this step, the College is reflecting the importance of members following appropriate business practices that reflect the expectations and confidence of the Ontario public. The College takes this matter extremely seriously. The public interest depends on the integrity of the profession, and protecting the integrity of the profession demands a zero tolerance approach towards inappropriate business practices.

On February 22, 2019, Council adopted, in principle, a zero tolerance policy for inappropriate business practices. The Executive Committee approved and implemented the policy on May 10, 2019.