



April 30, 2021

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By email: [consultation.osteopathie@opq.gouv.qc.ca](mailto:consultation.osteopathie@opq.gouv.qc.ca)

To whom it may concern:

**Re: Consultation on *The Professional Supervision of Osteopaths***

On behalf of the Canadian life and health insurance industry (CLHIA), we are pleased to have the opportunity to provide our comments on the consultation *The Professional Supervision of Osteopaths*.

The CLHIA is a voluntary trade association with member companies that account for 99 per cent of Canada's life and health insurance business. The life and health insurance industry provides over 6,100,000 Quebec residents with supplementary health benefit coverage. In 2019, the industry reimbursed roughly \$7.427 billion for healthcare goods and services, including prescription drugs, dental, mental health services, nursing, hospital, vision care and osteopathy.

**Benefit Plans**

Osteopathy is not a routinely covered benefit by private insurers / employers. There are a number of reasons for this, including the fact that osteopathy is currently not regulated anywhere in Canada.

The services of osteopaths may be covered benefits added at the employer's request. As osteopathic services are not reimbursed by the public plan in Quebec, reimbursement will be mostly from Quebec residents with some reimbursement from private payers.

Lastly, should the services of an osteopath be a benefit within any particular plan, it does not mean that services within the full scope of practice are covered benefits.

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## **Consultation Background**

We understand that the definition of osteopathy and osteopaths in Quebec will be consistent with the Canadian definition and might read as follows:

Practitioners of natural healing, osteopathic manual therapists perform some or all of the following duties:

- Diagnose, treat and manage musculoskeletal and other related disorders of the body's structure by moving, stretching, and massaging a patients' muscles and joints to correct biomechanical dysfunctions.

We understand that the proposed curriculum of education is as follows:

To develop the knowledge and skills necessary for the practice of osteopathy, the WHO offers two categories of training programmes:

- Type I requires 4200 hours, including at least 1000 hours of supervised clinical practice, and is intended for no prior health-care training;
- Type II is aimed at those with prior training as health-care professionals. Length of training may be modified depending on the prior training of individual applicants. Please see appendix 2 of the [consultation document](#).

## **Recommendations**

CLHIA supports the proposed scope and curriculum of education as well as the creation of a separate ordre for osteopaths. We will not provide responses to the many questions within this consultation on scope of practice as we understand that many different healthcare providers have submitted recommendations over the many years that this has been in progress. Rather, we would make the recommendation that the scope of practice should be very well-defined and available to the public; including identification of reserved acts, alignment against other professionals and a clear framework of the limitations that apply to osteopathic practitioners. There should be no 'grey areas' within a scope of practice. If possible, scopes of practice should be consistent from jurisdiction to jurisdiction.

A clearly defined guideline to what professional titles and designations the members will be restricted to will be of utmost importance. But we would suggest that the form of regulation go further than reservation of title. The development of an ordre should include:

### **Code of conduct and ethic**

- Development of various committees required to keep the public safe, to respond to complaints and to discipline members;
  - ensuring that there is a fair and transparent process to respond to concerns and complaints made against members.

- disciplining osteopaths appropriately after a hearing, conducted before a jury of peers and members of the public.
- ensuring that there is a mechanism for learning, growth, improvement and awareness by summarizing and reporting publicly the results of discipline findings.
- Development of an ethics committee;
- Development of standards of practice that are comparable to other paramedical regulatory colleges and in doing so, the ordre must hold their members accountable for their conduct and practice.

### Training and continuous education

- Development of a publicly available list of accepted schools for osteopathy education;
- Development of a framework to ensure training programs are delivered by duly qualified instructors;
- Development of a holistic curriculum that schools must follow to ensure a consistent training among future and current practitioners;
- Establishment and promotion of continuing education requirements and mechanisms to ensure and enforce that members are meeting those requirements;
- Ensuring that the profession monitors best practices and evidence-based information and embed them in the continuing education requirement and in the training curriculum.

### Registry and membership

- Implementation of a public register in order for Quebec residents to validate that the practitioner is licensed and, therefore, to protect the public. Insurers will also use the information to validate licensure at time of claim.
- Establishment of a clear cut-off date by which members must be registered with the regulatory body in order to legally be allowed to perform osteopathy in Quebec.
- Prior to registration to the ordre each candidate must be assessed to determine their eligibility for entry to practice. That assessment should be comprised of a review of the following:
  - education (credentials)
  - competence (successful completion of a competency-based exam)
  - communication (English or French proficiency)
  - knowledge of laws, ethics and standards
  - accountability/responsibility (liability insurance)

### Pricing and billing

- Development of a price guide, reviewed regularly, so patients can effectively know if the prices being charged are in-line with other osteopaths.

- Ensuring there are billing standards so patients can clearly identify how much they are being charged and for which services.

Thank you for the opportunity to provide comments on behalf of the insurance industry. We would be pleased to discuss further or provide any other information as needed. Please feel free to contact me at [lduhaime@clhia.ca](mailto:lduhaime@clhia.ca) or (514) 375-5068.

Sincerely,

Lyne Duhaime  
President Quebec Affairs