



March 31, 2021

Dr. Nancy Whitmore
Registrar & CEO
College of Physicians and Surgeons of Ontario
80 College Street
Toronto, Ontario
M5G 2E2

Dear Ms. Whitmore:

The Ontario Chiropractic Association (OCA) is pleased to provide feedback to the College of Physicians and Surgeons of Ontario (CPSO) on its proposed policy entitled Complementary and Alternative Medicine.

The OCA represents Ontario's chiropractors by serving our members and the public by advancing the understanding and use of chiropractic care. Chiropractors adopt evidence-based practice principles to guide clinical decision-making by integrating their clinical expertise, patient preferences and values, and the best available scientific evidence. Chiropractors are musculoskeletal (MSK) experts, providing the assessment, diagnosis, treatment and preventative care of biomechanical disorders originating from the muscular, skeletal and nervous systems. Furthermore, the chiropractic scope of practice as defined by the *Chiropractic Act, 1991* is the assessment of conditions related to the spine, nervous system, muscles and joints, and the diagnosis, prevention, and treatment, primarily by adjustment of:

- dysfunctions or disorders arising from the structures or functions of the spine and the effect of those dysfunctions or disorders on the nervous system; and
- dysfunctions or disorders arising from the structures or functions of the joints.

OCA appreciates the importance of CPSO updating its professional expectations for physicians who provide care within the rapidly evolving domain of complementary and alternative medicine. In this spirit, OCA outlines concerns and feedback on several aspects of the proposed policy and companion document that misrepresent chiropractic care and may serve to limit patient choice and access to care.

Advice to the Profession: Complementary and Alternative Medicine

We find it curious that the proposed guidance document (Lines 18-20) defines chiropractic treatment as a complementary or alternative therapy. A common form of chiropractic treatment, spinal manipulation is a controlled act under Ontario's *Regulated Health Professions Act, 1991*. This is one of the controlled acts for which physicians have the authority to perform under the *Medicine Act, 1991*.

In a similar vein, the discussion of evidence (Lines 88-90) also conflates chiropractic care with CAM. The guidance states that "many complementary or alternative treatments have either not been the subject of randomized controlled clinical trials, or the results of the available research do not convincingly demonstrate any positive effect." In fact, a variety of research studies demonstrate the efficacy of chiropractic treatments such as spinal manipulative therapy, joint mobilization, soft tissue work, etc.



Most recently, the Centre for Effective Practice has developed the tool [“Manual Therapy as an Evidence Based Referral for Musculoskeletal Pain”](#), which clearly documents the important role chiropractors play in delivering evidenced based care to patients. (OCA is extremely concerned that the mischaracterization of chiropractic treatment as part of CAM may serve to undermine the public’s understanding of, and trust in, chiropractic care).

Complementary and Alternative Medicine Policy

The proposed CAM policy sets out many important and necessary principles and provisions to protect patients’ best interests in a manner that is respectful of patient preferences, values, and beliefs. OCA recommends that patients’ best interests and autonomy would be further enhanced by including provisions to encourage inter-disciplinary and inter-professional collaboration via consultations and referrals.

OCA appreciates the opportunity to provide feedback to CPSO on the proposed CAM policy and guidance document and welcomes any opportunity to discuss its recommendation with you and/or CPSO Council.

Sincerely,