



COLLEGE OF CHIROPRACTORS OF ONTARIO

MEMORANDUM

To: Mark Dobrow, Principal Investigator, ACE
Jessica Bytautas, ACE

C. Ms Jo-Ann Willson, Registrar and General Counsel

From: Mr. Rob MacKay, President

Date: August 4, 2021

Re: Status Update on ACE Study ¹

Now that some time has passed since ACE was first retained to do work on the topic of chiropractic and immunity, I thought it would be helpful to remind all of us about why CCO commissioned this study and chose ACE to do the work in the first instance.

During the pandemic, CCO received an unprecedented number of complaints relating to claims involving chiropractic and immunity. CCO has a complaints and discipline procedure designed to ensure a thorough and fair investigation of any accusation of professional misconduct, consistent with the requirements of the *Regulated Health Professions Act, 1991*. The Inquiries, Complaints and Reports Committee, and in some cases the Discipline Committee, relied on *existing* standards of practice in exercising their statutory mandates, which did not necessarily reflect the best available information concerning chiropractic and immunity.

CCO wanted an independent policy body with study design expertise, credibility, impartiality, and access to multidisciplinary experts to conduct a fulsome review of the available research, information and data concerning the topic of chiropractic and immunity. CCO was of course aware of research and papers done by members of the chiropractic community but sought an independent review of all relevant information and wanted to ensure that the review was not biased or unduly influenced by others who may have a vested interest in specifically advancing the validity of their own research or perspectives.

¹ ACE is the Accessing Centre for Expertise, Institute of Health Policy, Management and Evaluation, Dalla Lana School of Public Health, University of Toronto.

CCO's statutory mandate is to protect the public interest. It was important to retain a research group that could draw on the expertise within the chiropractic community, as well as engage with the public to help inform CCO's decision making consistent with that mandate.

ACE has a proven track record in providing information helpful to CCO's decision making. As you know, the Registration Committee relied on the work done by ACE to recommend a policy relating to provisional certificate of registration for those applicants who could not complete all the requirements for registration because the in-person examinations conducted by the Canadian Chiropractic Examining Board were cancelled. Policy P-058: Policy on Considering Applications for Registration During the COVID-19 Pandemic (Provisional Certificate Policy), has subsequently been cited as an innovative/best practice by the Office of the Fairness Commissioner.²

It is important to remember that as the nervous system is specifically referenced in the chiropractic scope of practice in Ontario, any claims made pertaining to it or its potential role in boosting immunity or overall health outcomes fall within the purview of the Regulator, and therefore the responsible course of action is to ensure the available research is thoroughly reviewed.³

It is also important to remember what the ACE study is, and what it is not. From CCO's perspective, the ACE study is not a strictly academic research paper, but rather is a tool to facilitate and inform CCO's policy considerations as CCO exercises its statutory mandate to regulate all of chiropractic in the public interest. The current context includes a global pandemic. We anticipate the study will help move forward one of CCO's strategic objectives, namely "to ensure standards and core competencies promote excellence of care while responding to emerging developments."

We all look forward to receiving your report, so we can review the information from the perspective of public protection, and CCO's role in developing, establishing, and maintaining standards of practice to which the profession must conform.

² OFC newsletter, May 2021 edition, page 5.

³ *Chiropractic Act, 1991*, s. 3 (Scope of Practice):

The practice of chiropractic is the assessment of conditions related to the spine, nervous system and joints and the diagnosis, prevention and treatment, primarily by adjustment, of,

- (a) dysfunctions or disorders arising from the structures or functions of the spine and the effects of those dysfunctions or disorders on the nervous system; and
- (b) dysfunctions or disorders arising from the structures or functions of the joints.

There is an Executive Committee meeting on August 13, 2021, and it would be helpful if you could provide a one-page status summary of where the work is at, the anticipated timelines, any preliminary findings, and what remains to be done. We look forward seeing this project reach completion. Thank you.

A handwritten signature in blue ink, appearing to be "RMMB", written in a cursive style.



06 August 2021

Robert MacKay
President
College of Chiropractors of Ontario

Jo-Ann Willson
Registrar and General Counsel
College of Chiropractors of Ontario

Re: Project Status Report

Dear Mr. MacKay and Ms. Willson,

Thank you for your memo dated 04 August 2021. The Accessing Centre for Expertise (ACE) appreciates the opportunity to work with the College of Chiropractors of Ontario (CCO) and we are working diligently to complete our independent review of relevant research, contextual and experiential evidence on the topic of chiropractic and immunity. We provide this project status report to CCO in advance of your Executive Committee meeting on 13 August 2021 to summarize the status of the project, outline some preliminary findings from the work conducted to date, and note the timelines to complete the final phase of the project and deliver the final report.

Status of the project:

We have completed two of the three phases of the project, including the scoping review/targeted scan and the key informant interviews. We are currently working to complete the final phase of the project involving the conduct of three deliberative dialogues with (1) chiropractic patients, (2) other health professional regulatory bodies in Ontario, and (3) chiropractic regulators from other Canadian and international jurisdictions. While we have completed a detailed draft report of the findings based on the scoping review/targeted scan and key informant interviews, the report will be revised and updated based on the findings from the final phase (deliberative dialogues), which we use to triangulate our data sources and improve the validity of our findings.

Timelines to complete the final phase:

We are inviting participants for the deliberative dialogues now and hope to have all deliberative dialogues completed by the end of August 2021 with the final report delivered to CCO by 15 September 2021. We appreciate that this timeline extends beyond the original plan, but we believe the complexities of the project and the importance of triangulating findings across the three methods conducted, will lead to a more rigorous, comprehensive and useful report for CCO.



Preliminary findings:

Subject to the above notes, and the qualifier that our findings will not be final until we complete the third phase of the project, we can share some preliminary findings from our work to date. Our scoping review and targeted scan identified 18 reviews, 40 empirical studies (9 experimental, 31 observational) and 16 other articles (mostly commentaries). Of the 18 reviews, four were systematic reviews of reasonable quality, while the remaining reviews were of different types (scoping, rapid, narrative or undeclared) and were characterized by poorly (or un-) documented methods and limited rigour and quality. The 40 empirical studies included in our review represented a range of study methodologies and a range of research questions that address the relationship between chiropractic and immunity. The research evidence is quite sparse and seemingly uncoordinated to address the challenging and complex questions in the field. We also noted definitional inconsistencies related to 'chiropractic' and 'immunity' that present further challenges for the development of a coherent evidence base to guide future policy development.

Interviews were conducted with 18 key informants representing a range of chiropractic perspectives and involving participants from Ontario and multiple other Canadian and international jurisdictions. Key informant interviews were used to provide insights on the relationship between chiropractic and immunity and also to validate the scoping review/targeted scan results. We received a range of perspectives that reflect the tensions in the field and aligned with the research evidence we identified through the scoping review/targeted scan. We will use the deliberative dialogues to explore further issues raised by key informants or identified through the scoping review and targeted scan.

We thank CCO for the opportunity to work on this interesting and challenging project.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark J. Dobrow', with a stylized, flowing script.

Mark J. Dobrow, PhD
Director, Accessing Centre for Expertise
Associate Professor
Institute of Health Policy, Management and Evaluation
Dalla Lana School of Public Health
University of Toronto

