FORAC
FAROC

Federation of Optometric Regulatory Authorities of Canada
Fédération des autorités réglementaires optométriques du Canada

FORAC-FAROC Position Statement: Insurance Industry Policy and Regulatory Boundaries

FORAC-FAROC member colleges take fraud, or abuse of the insurance system, by registrants, seriously. Such conduct is incompatible with professional standards of practice and codes of ethics. Insurers play an important role in fraud prevention.

FORAC-FAROC acknowledges insurers have a legitimate interest in protecting the integrity of their benefit programs. However, insurer policies that overreach into the domain of professional regulation blur an important distinction between commercial insurance oversight and the authority of professional regulatory colleges.

FORAC-FAROC has identified two areas where insurance industry policies may conflict with regulatory obligations of registrants:

1. Misrepresentation of Regulatory Endorsement

Insurance industry materials that imply regulatory consultation or endorsement, when none has occurred, constitutes misrepresentation and causes confusion. Patients may incorrectly conclude that insurer policies reflect regulatory standards. This may give the impression that registrants/providers are operating outside approved regulator guidance, when, in fact, they are acting in compliance with their regulatory obligations. Misrepresentation of regulatory consultation or endorsement can undermine public trust in both regulators and providers, and obscures the distinct and separate roles of professional regulators and commercial insurers.

2. Interference with Professional and Clinical Independence

Insurer policies that have the effect of discouraging registrants from providing clinically indicated tests or treatments, or that promote lower cost alternatives without regard to clinical appropriateness, or may otherwise dictate how care is to be

delivered, encroach on the patient-provider relationship and conflict with established standards of practice. When commercial insurer policies influence clinical decision-making; they risk undermining quality of care. Optometrists must be free to provide care to patients in accordance with their clinical judgment and professional obligations, without fear of commercial reprisal.

FORAC-FAROC's position:

Optometrists, and all regulated health professionals, are obligated to provide the public with safe, quality care. They do so by acting in the best interests of their patients, within their scope of practice and in accordance with professional standards of practice.

Insurers have the right to determine what falls within their benefit structures. Those determinations must be made transparently, communicated clearly to both providers and patients, but cannot function as a mechanism to discourage clinically appropriate care.