

## Consultant 106

22 August 2012

Dear Commission Members

I am a chiropractor registered with the General Chiropractic Council (GCC) and am a member of the British Chiropractic Association (BCA). In addition I am also a member in good standing of the College of Chiropractors. I have been associated with these bodies for many years and have consistently met with all requirements to continue to be a Chiropractor in good standing.

I trained in the US and have been practising in the UK for over [X] years. For the last [X] years I have run a highly reputable clinic in [X]. Throughout my career I have had an excellent working relationship with a number of medical insurance companies.

Now I feel that I am being put into an extraordinarily difficult position by the Chiropractor Network insurance scheme that Bupa is currently launching. This scheme is coercive, anti-competitive and I cannot see how these proposed changes can possibly benefit either the patients or the chiropractic profession.

### Fees.

The fees I charge are in line with those of other chiropractors in my area. If I agree to the Bupa terms I will become an 'approved' practitioner and will have to accept a substantially lower fee for my services and will have to have a 2-tier pricing policy within my clinic, differentiating between Bupa patients and non-Bupa patients. This creates a stigma for the 'non-approved' Chiropractors in the eyes of the public, which will obviously be interpreted as being less clinically competent. If the Chiropractic network goes ahead as planned, it gives an unjustified level of control over a profession's future by an insurer interested only in their own bottom line.

We prefer to compete on the basis of the quality of a patient's treatment.

To date our patients have been happy with our reasonable charges, and with the level of reimbursement they receive from their respective insurers. If some of our patients are 'topping up' the difference between our charges and their insurers amount of reimbursement, I fail to see that this should be of any concern to Bupa, or any other insurer. If any of our patients were to have an issue with our fee structure, then that is an issue between us and our patients. We have no such issues. If any patients have an issue with the level of reimbursement from their insurers, then that should be a matter between the patients and the insurers.

If Bupa continued to allow 'top up' payments to be made by patients to their Chiropractors real competition would exist between practitioners and between private medical insurers.

Bupa allows 'top up' fees by Consultants and is discriminating against Chiropractors by not treating us the same. Yet Bupa holds Chiropractors and Consultants to the same 5-year experience rule before allowing either to apply as a Bupa provider.

Finally, the system of reimbursement proposed by Bupa will place a not inconsiderable administrative burden on our clinic. We currently require all of our patients to pay when they receive their treatments. This means we have no outstanding fees to manage and collect.

### Treatment decisions

No-one is better qualified than a competent chiropractor to determine the amount of treatment needed by a patient. Furthermore, as treatment progresses it is frequently the case that additional areas that need treatment are discovered. The work of a competent chiropractor is not like 'painting by numbers'. For example; an apparent lower back complaint may very likely be discovered to be caused by, say, a long-forgotten foot injury. I regard this an on-going treatment. Bupa may regard this as 2 or more separate issues, each requiring additional administration.

Having the amount and nature of the treatment I can offer a patient being decided by a 3<sup>rd</sup> party, a party with an overwhelming interest in minimising its costs, is totally incompatible with good medical care. And it is on the basis of good medical care that I compete with all other chiropractors.

### Approval

Chiropractors registered with the GCC are thereby approved by the most competent body in the country to conduct their business. To have a 3<sup>rd</sup> party label those of us who may choose not to sign up to their requirements as 'not approved' is inappropriate. This implies to a significant proportion of the public that we do not meet general chiropractic standards.

I am concerned that Bupa is abusing its dominant position and unequal bargaining power between itself and Chiropractors, thereby removing any real choice of care/care-giver from the public. And this is being done at potentially great cost to the Chiropractic profession.

Please investigate this matter and instruct Bupa to bring their network more in line with what Chiropractors and the public consider fair and acceptable.