

# Board of Directors of Drugless Therapy Naturopathy

Important Communiqué to All Registrants - October 6, 2008

## Securing Prescribing Authority for Naturopathic Doctors in Ontario

### Approach

In the June 8, 2007 referral to the Health Professions Regulatory Advisory Council (HPRAC), the Minister of Health and Long-Term Care (MOHLTC) asked HPRAC:

*"to examine the authority given to non-physician health professions to prescribe and/or use drugs in the course of their practice under the Regulated Health Professions Act, 1991 (RHPA) and the health profession acts. I ask that the Council provide advice specific to each of these professions respecting whether lists, categories or classes of drugs should be prescribed by regulation for the profession, or whether restrictions on prescribing of drugs should be placed in regulation under the respective health profession Act".*

Naturopathic medicine is one of the professions invited by HPRAC to participate in the review. This is likely the last opportunity to amend the *Naturopathy Act* to include the

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controlled act of prescribing for NDs before it comes into force and effect. HPRAC's review began on October 2 with a briefing to the 12 professions involved in the referral. Submissions are due on November 12, 2009. The Minister has asked HPRAC to provide its recommendations by no later than March 31, 2009.

Naturopathic stakeholders including the BDDTN, the OAND, the CAND and the CCNM have agreed to work together with the objective of providing to HPRAC a clear and compelling rationale for recommending that NDs have the authority to prescribe and dispense substances that are essential to patient care. A multi-stakeholder Work Group has been established that will meet regularly to coordinate the contributions from each of the four organizations, including the development of a list of those substances that are integral to the practice of naturopathic medicine in Ontario.

## Background

Under the *Regulated Health Professions Act* (RHPA) which will include NDs in a year or two, "prescribing, dispensing, selling or compounding a drug as defined in the *Drug and Pharmacies Regulation Act*" is a controlled act reserved to only a few health care professions. The current wording of the *Naturopathy Act, 2007* does not provide NDs with access to this controlled act. There is concern that, without authorization to perform this controlled act, NDs will not be able to access all the medicines they are trained to use and that NDs and their patients could lose access to substances if they are moved to a more restricted category under federal legislation such as the *Food and Drugs Act*. Under such legislation only professions that have been awarded the authority to prescribe by the province in which they practise have access to certain substances.

There is a broad consensus within the profession that naturopathic doctors must have "prescribing" authority so that they and their patients retain access to all the substances that are integral to the practice of naturopathic medicine. This consensus has broadened since the federal government tabled Bill C-51, which had the potential to create a more restrictive environment for the regulation of substances. Although Bill C-51 died on the order paper, similar legislation that would have much the same effect for the profession is expected to be tabled in the next Parliament. The BDDTN, the OAND, the CAND and the CCNM agree with this consensus and support NDs having prescribing authority in order to maintain patients' right to receive the full scope of naturopathic care from NDs.

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NDs are highly trained to use therapeutic natural substances safely and effectively and indeed have been awarded prescribing authority in most regulated US jurisdictions.

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Prescribing authority for NDs is under consideration in other Canadian jurisdictions as well. In previous reviews of the profession, HPRAC has recommended that Ontario's NDs be awarded the controlled act. For these reasons we are optimistic about the current review. Our concern arises from the fact that the Ministry has not followed through on HPRAC's advice with respect to prescribing because of a misapprehension that NDs can continue to practise as before without access to the controlled act.

The HPRAC review will require intensive work by the OAND, the CAND, the CCNM and the BDDTN within a very limited period of time. We will continue to keep NDs informed throughout this period through updates like this one.