

Board of Directors of Drugless Therapy Naturopathy

HPRAC RECOMMENDS "PRESCRIBING" AUTHORITY FOR NATUROPATHIC DOCTORS

March 3, 2009

Dear Registrant,

In previous communiqués, we have informed Registrants about the recent Submission to the Health Professions Regulatory Advisory Council (HPRAC) asking that the *Naturopathy Act, 2007* be amended to authorize NDs to perform the RHPA controlled act of prescribing, dispensing, selling or compounding drugs. The Board invited the OAND, CAND and CCNM to participate in that submission.

HPRAC completed its review on January 31st and the Ministry released HPRAC's report, entitled *Critical Links: Transforming and Supporting Patient Care*, on February 2nd. The Report is available on both the Ministry and HPRAC websites. Chapter 11, pages 249 through 273, deal specifically with HPRAC's recommendations with respect to the naturopathic profession. The Board, with the OAND, CAND and CCNM, submitted a joint response to HPRAC's report, a copy of which is on the Board's website: www.boardofnaturopathicmedicine.on.ca

The Board is very pleased with the outcome of the report. HPRAC recommended that the *Naturopathy Act* be amended to add a seventh authorized act, namely:

"Prescribing, dispensing, selling or compounding a prescription therapeutic product or drug that the member may prescribe, dispense, sell or compound under the regulations."

Those who read Chapter 11 of *Critical Links* will note a number of specific anomalies or oversights in terms of HPRAC's recommendations as to the categories or specific drugs to which HPRAC recommends naturopathic doctors have access. Those matters will be the subject of discussions among the Transitional Council, other RHPA Colleges and other stakeholders once the amendments have been made to the *Naturopathy Act*. Accordingly, our joint response dealt only with matters pertaining to the recommended amendments to the *Naturopathy Act*.

If the Minister of Health and Long Term Care decides to act on HPRAC's recommendation, the new College of Naturopaths would prepare a regulation to specify (by classes, categories or individual drugs) all the substances that NDs may prescribe. The regulation would have to go through the usual process of interprofessional consultation, be approved by the Minister of Health and Long-Term Care and ultimately by the Lieutenant Governor in Council (Cabinet). This is the same process that will be used for regulations pertaining to the other six authorized acts and that HPRAC has recommended for other professions that have access to all or parts of the same controlled act.

HPRAC's role is to provide advice to the Minister of Health and Long-Term Care. It is entirely up to the Minister what he does with that advice. Members will recall that in the past the Health Minister has rejected similar advice from HPRAC. We are hopeful, however, that with the likelihood of more and more substances being put on restricted lists under the *Food and Drugs Act*, by the Government of Canada, the Minister will accept HPRAC's recommendations this time. In any event, a Bill to respond to HPRAC's recommendations with respect to the scope of practice reviews conducted last year and those in *Critical Links* is apparently being drafted and could be tabled in the Legislature as early as this Spring. We intend to work to ensure that HPRAC's recommendations with respect to the *Naturopathy Act* are included in that Bill.

In addition to its advice with respect to prescribing authority for NDs, we are pleased to note that HPRAC has made another recommendation that has been raised by the Board in numerous discussions since the Naturopathy Act received Royal Assent; namely removing the modifier "naturopathic" in reference to "diagnosis" from the authorized act of "communicating a diagnosis" in the *Naturopathy Act, 2007*. In its rationale on page 265 of *Critical Links*, HPRAC states that "the modifier has been interpreted as meaning that the diagnosis to be communicated to a patient may be less expert, exacting or complete as a diagnosis made by other professions such as nursing or medicine". We strongly support this recommendation and expressed this in our joint response to the Minister on *Critical Links*.

The Board urges all registrants to review HPRAC's report, which can be accessed through the Ministry of Health and Long-Term Care's web site at www.health.gov.on.ca.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Angela M. Moore', enclosed within a large, loopy oval scribble.

Angela M. Moore, ND
Executive Director