

Dual Registration

In Ontario, Drugless Practitioners are permitted to be registrants of more than one Board and accordingly, have the right to practice more than one health profession.

This Board has always taken the position that dual registration provides an opportunity for the health professional to enhance the service delivered to the public.

The purpose of these guidelines is to ensure that all registrants of this Board continue office procedures that make it perfectly clear to patients, the public, this Board, and other health professions and the Ministry of Health when and whether the services charged for are naturopathic services or those of another profession.

OFFICE PROCEDURES FOR USE BY DUAL REGISTRANTS

PURPOSE

This policy clarifies the procedures to be used by dual registrants when providing patient care. These procedures ensure that each patient is fully aware of the kind of services being received during each patient visit, and that it is clear which standards of practice and Regulatory Board govern that visit.

DEFINITIONS

DUAL REGISTRANT: A current registrant of the Board of Directors of Drugless Therapy - Naturopathy (BDDT-N) who is also a current registrant of any other regulated health care profession in the Province of Ontario.

APPLICABILITY

This policy applies in all cases where naturopathic services and other regulated health care services are being provided by the same practitioner.

PROCEDURES

1. The laws, policies and standards of practice governing naturopathic medicine apply for each naturopathic office visit.
2. All records pertaining to the practice of naturopathic medicine must stand alone.
3. All patient progress records, treatment records, diagnosis codes, treatment codes, treatment plans, billing records, correspondence and other written information pertaining to the delivery of naturopathic services must be kept in a separate file folder that is complete in itself.
 - The separation of files is necessary because if the BDDT-N needs to investigate a complaint from a patient regarding naturopathic treatment received from a naturopath who is a dual registrant, that practitioner must be able to supply the Board with all records pertaining to any and all naturopathic visits by that particular patient. No other records should be included with naturopathic records.

- A separate patient visit must always be scheduled for naturopathic services and only naturopathic services may be provided at that visit.
- If both services have to be provided on the same day, separate appointments and appropriate times must be shown in the appointment book.

Example: April 23/91 10:00 am Mr. A. Smith Visit: Naturopathic
 10:30 am Mr. A. Smith Visit: Other

4. Each patient must be advised prior to each visit as to whether naturopathic services will be provided at that visit. A change in the type of service to be delivered (i.e.: naturopathic or other) may be decided immediately prior to the actual office visit by interviewing the patient, but never after the office visit has begun. In all cases, the patient must know beforehand what type of professional care he/she will be receiving.

Example: A patient is booked for services other than naturopathic, but, on arrival at the office, the patient has a complaint that requires naturopathic care. The registrant should inform the patient that, with the patient's consent, they can

- a) change the visit to a naturopathic visit, treat and bill accordingly,
- b) proceed with the other service visit as booked and reschedule time for the naturopathic service on another day.
- c) provide the non-naturopathic service as scheduled and bill accordingly, then provide naturopathic care as a separate visit. The appropriate naturopathic appointment time must be recorded in the appointment book, a record of the naturopathic examination, diagnosis and treatment made in the patient's records, and the visit billed and coded according to your office fee schedule for the naturopathic services provided.

The same guidelines apply to non-naturopathic services required at the same time as a naturopathic visit.

5. It must be clear from the appointment book, naturopathic records and billing records that a separate naturopathic visit was scheduled and carried out.

Providing naturopathic services at a non-naturopathic visit (for which OHIP is billed and the patient charged a surcharge for that non-naturopathic service) could make it appear to the Board investigator that naturopathic services are being billed to OHIP. This is not acceptable and therefore must be avoided.

Please refer to Record Keeping Procedures.