



## Naturopathy and Homeopathy Act Amendments Submission from the OAND

### Diagnosis

#### Summary of Need for Change:

- Limiting naturopathic doctors (NDs) to providing a “naturopathic diagnosis” may place unreasonable limits on the ability of NDs to continue to perform diagnosis as patients have come to expect. NDs should be permitted to provide a diagnosis within their scope and within standards established by the regulator, as with MDs, dentists, optometrists, podiatrists, psychologists and chiropractors.
- Establishing a naturopathic diagnosis as a concept that is different from a medical diagnosis could substantially limit opportunities for collaboration if the ND’s diagnosis cannot be accepted by other healthcare practitioners.
- The wording needs to be updated to be more closely modeled on the controlled act in the RHPA, including using the term “symptom” rather than “illness”, and “disease” rather than “dysfunction”.
- It is unnecessary and potentially limiting to specify the naturopathic techniques necessary to reach a diagnosis. This can be accomplished through College standards.
- Replacing the term “naturopathy” with “naturopathic medicine” ensures the profession is described accurately.

#### Proposed Wording:

4. (1) In the course of engaging in the practice of naturopathic medicine, a member is authorized, subject to the terms, conditions and limitations imposed on his or her certificate of registration, to perform the following:
  5. Communicating a diagnosis identifying a disease or disorder as the cause of an individual’s symptoms through an assessment that uses naturopathic techniques.

#### Rationale:

Diagnosis is already within the scope of naturopathic medicine as established under the *Drugless Practitioners Act (DPA)*. Diagnostic procedures that are part of the training and standards of practice of NDs include: case history; physical examination using standard medical diagnostic equipment and including breasts and genitalia; and laboratory diagnosis including blood, urine, stool and cultures.

One of the benefits of moving NDs from the DPA to the RHPA is increased opportunities for interdisciplinary collaboration. This collaboration will benefit from the ability of other healthcare providers to be able to accept a diagnosis provided by the ND. If a naturopathic diagnosis is established as a concept that differs from a medical diagnosis, this may not be possible. It may also limit the ability for NDs to consult with MDs if the MD cannot accept the ND's diagnosis as the basis for the consultation, decreasing the quality of care available to the patient.

The proposed amendment is based on the wording of the controlled act in the RHPA, which is “communicating to the individual or his or her personal representative a diagnosis identifying a disease or disorder as the cause of symptoms of the individual..”

Disease is a concept that is over and above disorders or dysfunctions, and therefore needs to be included in order for the scope statement to fully capture current practice. Any condition that impairs the normal functioning of an organism can be called a disease. For example, the common cold is a disease, rather than a disorder or dysfunction. A disease may also refer to the presence of a pathology which can be the cause of a current or potential disorder or dysfunction. Other diseases that NDs regularly diagnose include urinary tract infection, flu, and epidemic symptoms.

Given the education and training that NDs receive in order to properly undertake diagnosis, it is unnecessary and potentially limiting to include a list of procedures, specifically “assessing the individual's lifestyle, environmental and nutritional history” that must be included as part of diagnosis. These assessments are integral parts of naturopathic care, along with comprehensive health examination, specimen collection and laboratory testing, and other investigations that NDs are authorized to perform. As with other professions, all of these assessments may not be necessary at all times to develop a diagnosis, and instead requirements for diagnosis should be established by the regulator.