



May 5, 2009

Dear,

No patient wants to lose care from their practitioner simply because of an oversight. We need your assistance to ensure this doesn't happen.

The *Naturopathy Act*, 2007 moves the regulation of Naturopathic Doctors (NDs) into the *Regulated Health Professions Act* (RHPA) framework, after over 80 years of being regulated under other legislation. Moving a profession from one regulatory framework to another is a complex undertaking. What is most critical is to ensure that this change happens in a way that does not unintentionally reduce scope of practice and take care away from patients.

The *Naturopathy Act* awards five Controlled Acts to NDs. One that is missing is the controlled act of prescribing, which includes compounding. This was deferred until it could be dealt with as part of a comprehensive process with the Health Professions Regulatory Advisory Council (HPRAC) involving all health professions needing changes to prescribing authority. HPRAC's report entitled *Critical Links* strongly recommends that NDs be awarded prescribing authority including access to basic primary care drugs. This is the third time that HPRAC has recommended prescribing authority for NDs. Ontario's Naturopathic Doctors and their patients are asking for your support in amending the *Naturopathy Act* as part of forthcoming legislation to include the controlled act of prescribing so that the profession can continue to provide the full scope of practice to patients.

There is a misperception that natural substances are without restriction, which is not the case. As a result, there is real concern about how the profession will maintain access to all natural substances that are essential to naturopathic medicine when the profession moves under the *Naturopathy Act* in 2011. Constant change in the federal regulation of substances increases this concern, and NDs have already lost many key substances. Patient safety requires that NDs also have access to key emergency medications. The attached briefing note contains more details.

The importance of prescribing authority for NDs is widely recognized. NDs in British Columbia were just awarded broad prescribing authority in April, 2009. In fact, every other Ontario health profession administering injection substances on their own authority has already been awarded prescribing.

NDs have the training and a long history of safely using restricted natural substances like injectable and higher-dosage vitamins and minerals. Patients value the unique approach of naturopathic care.

Naturopathic medicine is an evidence-based system of care that builds on the body's inherent self-healing capacity, with a particular focus on health promotion and disease prevention, as well as treatment that includes natural substances. NDs are already offering solutions to many of the biggest challenges in health care, including helping patients to address preventable risk factors for chronic disease.

The OAND has been meeting with senior government officials and staff to ensure that the impending legislation to transform the health care system will include the required amendment

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to the *Naturopathy Act* to award prescribing authority to Ontario's almost 900 licensed NDs. Without this change, NDs will lose access to substances they currently use to treat some of their sickest patients when the profession comes under the *Naturopathy Act*.


If you have any questions about this briefing package, please contact the OAND at 416-233-2001 and ask for Alison Dantas, CEO at extension 23 or email [adantas@oand.org](mailto:adantas@oand.org).

We thank you for your ongoing support of the profession in Ontario and look forward to working with you to improve patient access to high-quality health care.

Sincerely,



Shelley Burns, ND  
Chair



Alison Dantas  
CEO