



OAND ORAL SUBMISSION TO THE STANDING COMMITTEE ON SOCIAL POLICY

Bill 171: Naturopathy and Homeopathy Act

April 23, 2007

Good afternoon. I'm Ruth Anne Baron, Naturopathic Doctor and Past-Chair of the Ontario Association of Naturopathic Doctors. Joining me is Alison Dantas, CEO of the Association. The OAND is the professional association representing Ontario's registered NDs.

Our purpose for appearing here today is to offer the committee our recommendations for improvements to Bill 171, most importantly to ensure that the Naturopathy and Homeopathy Act will not reduce the scope of practice that NDs currently provide to patients.

Let me start, by stating that we welcome this legislation. By improving the regulation of Ontario's naturopathic doctors, this legislation shows a commitment to supporting Ontarians who choose complementary healthcare by making sure that they have better access to high quality care.

Ontario now has over 800 NDs, more than anywhere else in North America. We are currently regulated under the Drugless Practitioners Act and are highly trained primary care providers, with an educational structure similar to that of medical doctors.

NDs practice a unique and comprehensive form of medicine which helps our patients to live healthier lives, and has resulted in a growing demand for naturopathic medicine. NDs support and stimulate the body's ability to heal itself, focusing on prevention and the integration of standard medical diagnostics with a broad range of natural therapies. The primary goal of naturopathic treatment is to understand and address the cause of illness, rather than simply treating or suppressing symptoms.

The government committed to us at the outset of the legislative process that their goal was to ensure that we moved into the RHPA with our scope of practice intact, and we have been working closely with them to accomplish this.

We would appreciate your support in making these needed changes which will preserve the current scope of practice and treatment options available to our patients.

Preserving Full Scope of Practice

Certainly, we understand the challenges the government has faced in preserving our scope of practice and providing the necessary controlled acts in the move from the Drugless Practitioners Act into the Regulated Health Professions Act. For the most part, Bill 171 has been successful at implementing HPRAC's recommendations on how to accomplish this. I will focus on three critical issues that still need to be addressed.

Scope of Practice

The first is our scope of practice statement. The proposed statement is simply not an accurate description of our profession, and does not fully describe the scope of practice that we currently have under the Drugless Practitioners Act. We are asking for the scope statement to specifically recognize that we perform diagnosis, and treat diseases as well as



disorders and dysfunctions. The scope statement also needs to specifically recognize the essential approach of naturopathic medicine to treat the whole person, and we have proposed wording in our written submission to accomplish this.

Diagnosis

The second issue is the description of the controlled act of diagnosis. Bill 171 creates the concept of a “naturopathic diagnosis,” and we are concerned about the consequences of establishing this as a concept that appears to be different than a diagnosis made by a chiropractor, dentist or medical doctor.

This change of removing the word “naturopathic” is important to us and to our patients because the ability to have a shared understanding of diagnosis will make it easier to collaborate with other primary care practitioners. Otherwise, we are just creating silos in the health care system, rather than the kinds of relationships that will benefit patients.

We also are seeking wording changes to more closely model our controlled act on the current description of communicating a diagnosis in the RHPA, such as specific reference to disease and symptoms. These changes are outlined in our written submission.

Prescribing

The last issue with regard to preserving our full scope is ensuring that we can continue to access the natural substances that are integral to naturopathic medicine. This is essential for the treatments we provide to our patients.

The problem is that more and more natural substances are being reclassified as prescription drugs by the federal government, and thereby removed from the treatment options available to NDs for their patients. This reclassification is simply because it has been determined that these natural substances are not suitable for over-the-counter sale to the public.

The issue then for NDs is that unless the province provides us with access to a specific formulary of drugs, these natural substances will also no longer be available for use in naturopathic medicine.

This is why HPRAC recommended we should have the controlled act of prescribing. I can assure the committee we have no interest in seeking access to pharmaceuticals. However, we need the controlled act to have a mechanism that will preserve our access when natural substances become reclassified by the federal government, as is continuing to happen.

Other Changes

Next, I want to bring to your attention our concerns about how Bill 171 proposes to change our title to “Doctor of Naturopathy”, and the confusion this could create for the public.

In short, “doctor of naturopathy” is not the title we use in Ontario. Across North America, this title is understood to only be used by poorly-trained and unregulated practitioners. Changing the legislation to permit the continued use of our current title, Naturopathic Doctor, will maintain the public’s confidence that they are seeing a regulated healthcare provider.

Likewise, we would appreciate the College to be named the College of Naturopathic Doctors. And where the legislation refers to “naturopathy”, this should be changed to “naturopathic

medicine". Getting the descriptions of our profession right is important to the profession, to our patients and the general public.

Joint Regulation and Transition Council

The last topic I want to raise today is our concern about a joint college. Naturopathic Medicine is a distinct system of primary care that addresses the root cause of illness or disease and promotes health and healing using natural therapies. Preserving and maintaining the tenets of naturopathic medicine is better done by having our own regulator made up of professional and public members.

I think it is clear that the two professions are at very different starting points. The transition for Naturopathic Doctors to be regulated under the RHPA is going to be quick, efficient and relatively straight-forward. We have been regulated under the Drugless Practitioners Act for over 80 years and we already have standards of practice, eligibility requirements and a united profession.

We are concerned about who is going to pay for transition given the homeopaths are not currently regulated. NDs are not willing or able to bear the financial burden of regulating another profession. Also, creating this joint college simply adds to the challenge the public has in differentiating between the two professions.

I would urge you to let each of our professions maintain our distinct identities and approaches to medicine, and move at our own pace, by awarding us each our own self-regulating College.

If a joint College is still the preferred option of the government, NDs will work with homeopaths as long as the concerns we have regarding financial burden and differing pace of evolving through transition are addressed.

We also have some specific comments on the transition council itself. NDs are committed to modernizing our standards of practice and incorporating the best practices of other regulated health professions as we move under the RHPA. That's why it's important to have a transition council that has broad professional member representation that is selected through a clear and transparent process. We strongly urge you not to make any amendments which would limit this fresh start by adding provisions related to the transition council, unless it is limited to the transfer of assets from the current regulator.

Conclusion

We believe that our amendments will strengthen Bill 171, and allow Ontario's naturopathic doctors to be able to maintain the care that they are already able to provide under the Drugless Practitioners Act. As well, separate Colleges will help to ensure there is a clear and more effective transition for both of our professions into the RHPA. Our written submission includes more details on the need for these changes, and the proposed wording necessary to implement them in Bill 171.

I want to thank members of all three parties for the support you have shown for naturopathic medicine over the years. With your support, we can get this legislation right.

I would welcome the chance to answer any questions you may have.