



Maintaining Naturopathic Doctors' Access to Substances

The controlled act of prescribing, dispensing, selling and compounding is required for Naturopathic Doctors (NDs) to preserve current access to substances and patient care and to regain access to those that have become restricted at the federal level. The *Naturopathy Act* awards NDs the controlled act of administering a substance by injection, but did not address how substances will be accessed in advance of a comprehensive review by the Health Professions Regulatory Advisory Council (HPRAC). This review, *Critical Links*, has now been completed, and strongly recommends prescribing authority for NDs. Every other Ontario health profession administering injection substances on their own authority currently has prescribing.

Prescribing authority must be addressed in the *Naturopathy Act* because loss of substances that are integral to naturopathic medicine will limit the scope of practice of the profession and access to care for patients.

Prescribing Authority and the *Naturopathy Act*

Prescribing authority would be an amendment to the *Naturopathy Act*, and would come into effect through the Transition process to establish the College of Naturopaths and proclaim this Act, likely in 2011. The absence of prescribing authority in the *Naturopathy Act* of 2007 limits the current scope of practice of NDs and is causing significant barriers to NDs successfully making a full contribution to the health of Ontarians. The current education of NDs provides them with the base competence to prescribe, with necessary upgrading related to the scope of prescribing authority.

Risk of Patient Loss of Care

The following restrictions to naturopathic practice are likely following transition to regulation under the *Naturopathy Act* in the absence of the controlled act of prescribing, dispensing, selling and compounding:

- High probability of loss of injectable natural substances
- Loss of current authority under the *Drugless Practitioners Act* (DPA) to compound or combine these injectable substances in clinical practice under the *Regulated Health Professions Act* (RHPA)
- Continuing loss of access to naturopathic substances that have been changed to prescription-only
- More loss of naturopathic substances because of implementation of the federal Natural Health Products regulation on January 1, 2010
- Loss of current authority under the DPA to compound, dispense and sell any naturopathic substances currently obtained only from pharmacies
- Continuing or increased limits on access to emergency medicines NDs are trained to use to respond to emergency care in office: oxygen, epinephrine, Benadryl, bronchodilators, etc.

Benefits to the Health Care System

NDs have the potential to increase access to primary care, become more central in the prevention and treatment of chronic diseases, and through complementary and advanced practice provide their unique expertise in treatment that patients may not be able to receive from other professions.