



Naturopathy and Homeopathy Act Amendments Submission from the OAND

Scope of Practice

Summary of Need for Change:

- Amending the scope statement will allow for a more accurate description of the full scope of naturopathic practice that currently exists under the *Drugless Practitioners Act* (DPA), including diagnosis and diseases. The scope statement also needs to specifically recognize the essential approach of naturopathic medicine to treat the whole person.
- A more accurate scope statement helps the public by clearly differentiating between naturopathic medicine and homeopathy.
- The current name of the profession, naturopathic medicine, should be preserved. Ontario already recognizes in legislation other professions that practice medicine, including veterinary medicine and traditional Chinese medicine.

Proposed Wording:

- 3. (1) The practice of naturopathic medicine is the assessment of an individual, and the diagnosis and treatment of diseases, disorders and dysfunctions through the integrated use of naturopathic techniques to promote, maintain or restore health.**

Rationale:

The term “scope of practice” refers to the range of roles, functions, responsibilities and activities which a naturopathic doctor (ND) is educated, competent and has the authority to perform.

It is proposed that the scope refers to the practice of “naturopathic medicine” rather than “naturopathy” in keeping with established tradition in Ontario and the use of the term in other jurisdictions in Canada and the United States where “naturopathic medicine” is the recognized and accepted descriptor and “naturopathy” is primarily used to describe lesser-qualified or unregulated practitioners. The use of “naturopathic medicine” is in keeping with the definition of medicine, which is “maintaining or restoring human health through the study, diagnosis, treatment and possible prevention of disease and injury.” Ontario already recognizes in legislation that there are branches of medicine in addition to allopathic medicine, including traditional Chinese medicine and veterinary medicine, and as a result is unlikely to cause confusion with mainstream medicine.

One of the key principles of naturopathic medicine is to treat the whole person, based on the belief that health must go beyond the treatment of immediate symptoms, and instead treat the entire person’s well being. This principle is supported by the additional principle of *tolle causam*, removing the underlying root causes of

disease in order for complete healing to take place. This focus on the whole person, rather than the symptoms, is an important change to the scope statement.

The inclusion of diagnosis in the scope statement recognizes that NDs have been awarded this controlled act. The word “diagnosis” is in the scope statement of all other professions with this controlled act.

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.

An improved scope statement will also help the public with the important objective of clarifying the differences between homeopathy and naturopathic medicine.

The current scope of practice of NDs has been established through the *Drugless Practitioners Act (DPA)*. The DPA establishes that a “drugless practitioner” means “any person who practices or advertises or holds themselves out in any way as practicing the treatment by diagnosis, including all diagnostic methods, direction, advice, written or otherwise, of any ailment, disease, defect, or disability of the human body by methods taught in colleges of drugless therapy or naturopathy and approved by the Board.” The scope is therefore understood to encompass all the care the NDs have been trained to provide by an approved institution.

The scope statement recommended by HPRAC is: “The practice of naturopathic medicine is the promotion of health, the assessment of the physical and mental condition of an individual, and the diagnosis, prevention and treatment of diseases, disorders and dysfunctions through the integrated use of natural therapies and natural medicines that promote the individual’s inherent self-healing mechanisms.” This scope statement was developed in keeping with the philosophy of the RHPA to have overlapping scopes. In *New Directions* (p. 151) HPRAC asserts, “Consumers have choice in the selection of remedies and healthcare providers. HPRAC believes that they should also have the confidence that those who provide their care are adequately trained, operate within the appropriate scope of practice, provide safe care and are accountable for the service they provide.”