



Naturopathy and Homeopathy Act Amendments Submission from the OAND

Title Protection and Doctor Title

Summary of Need for Change:

- The conditions for the use of the Doctor title needs to be changed to allow naturopathic doctors (NDs) to continue to use their current title: Naturopathic Doctor.
- There is a public interest in continuity of use of the current title to promote public confidence that they are seeing a properly trained and regulated healthcare provider.
- There are also specific concerns with the title proposed in Bill 171: “Doctor of Naturopathy”. This title is not currently used in Ontario. In other jurisdictions in North America this title is only used by lesser-trained and unregulated practitioners, and in some jurisdictions is specifically understood to be those providers who do not meet the standards to be regulated as a Naturopathic Doctor. This would reduce confidence in Ontario that patients are seeing a regulated healthcare provider.
- Continuing to allow the use of the current titles in combination with the doctor title also supports the important public interest of assisting the public in differentiating between naturopathic doctors and homeopaths.
- For the same reasons, the regulator should be the College of Naturopathic Doctors rather than the College of Naturopaths.

Proposed Wording:

20. (1) Section 33 of the *Regulated Health Professions Act, 1991* is amended by adding the following subsections:

Same (1.1) Subsection (1) does not apply to a person who is a member of the College of Naturopathic Doctors and Homeopaths of Ontario and who holds a certificate of registration in naturopathic medicine.

Naturopathic Doctor (1.2) A member referred to in subsection (1.1) shall not use the title "doctor" or the abbreviation "Dr." without using the phrase "naturopathic doctor " or the abbreviation "N.D." immediately following his or her name.

Rationale:

- Naturopathic medicine is already an established profession in Ontario. It has been regulated in Ontario under the *Drugless Practitioners Act (DPA)* since 1925. There are established institutions in this province that use the current titles, including the Ontario Association of Naturopathic Doctors and the Canadian College of Naturopathic Medicine. Graduates of the program earn the right to become regulated and call themselves NDs.
- The use of a title conveys a tremendous amount of information to the public. Bill 171 extends the doctor title to NDs, but only allows them to call themselves “doctors of naturopathy.” This title is not currently used in Ontario. In fact, in many North American jurisdictions, a doctor of naturopathy is used by practitioners who only complete correspondence courses from unaccredited schools and do not meet the accepted standards of naturopathic doctors.
- As a result, the “doctor of naturopathy” title should not be used in Ontario. It does not meet one of the most important functions of the RHPA which is to ensure the public is confident that they are seeing a regulated healthcare provider.
- The proposed amendments to the *Naturopathy and Homeopathy Act* would allow the continued use of the current title in association with the doctor title: Naturopathic Doctor.
- Additional title protection is needed to ensure unregulated practitioners cannot continue to use similar sounding titles, such as “naturopath”, “doctor of naturopathic medicine”, and “doctor of natural medicine”. The Transition Council can play an important role in providing advice. As well, NDs should have the same use of doctor title as chiropractors, including the use of the doctor abbreviation.
- Finally, the regulatory college should be known as the College of Naturopathic Doctors and Homeopaths. This will also help in the important goal of helping the public to differentiate between NDs and homeopaths.