

OAND SUBMISSION TO THE STANDING COMMITTEE ON SOCIAL POLICY

April 23, 2007

INTRODUCTION

The Ontario Association of Naturopathic Doctors (OAND) welcomes the opportunity presented by Bill 171, and specifically the *Naturopathy and Homeopathy Act*. By improving the regulation of Ontario's naturopathic doctors (NDs), this legislation shows a commitment to supporting Ontarians who choose complementary healthcare by making sure that they have better access to high quality care.

At the same time, there are needed improvements to the *Naturopathy and Homeopathy Act*, most importantly to ensure that this legislation will not reduce the scope of care that NDs currently provide to patients, and to allow for separate regulatory colleges for the two professions.

This submission is comprised of an overview of our profession and the need for improved regulation, and separate discussion papers on each of the five critical topics to assist the Standing Committee on Social Policy in getting this legislation right. These topics are:

- Scope of Practice
- Diagnosis
- Prescribing, Selling, Dispensing and Compounding
- Title Protection

NATUROPATHIC DOCTORS – PARTNERS IN THE PRIMARY HEALTHCARE TEAM

Naturopathic medicine is a unique and comprehensive approach to improving health and treating illness. Focusing on prevention and using natural substances and treatments, naturopathic doctors support and stimulate the body's ability to heal itself. The primary goal of naturopathic treatment is to address the cause of the illness, rather than simply treating or suppressing symptoms. The patient is seen as a whole person and the ND considers the physical, mental, and emotional dimensions of an illness or condition when diagnosing and developing a treatment plan. Naturopathic medicine has the potential to play a significant role in addressing some of the critical issues facing the healthcare system in Ontario, including shortages of family physicians, and long wait times for specialists and minor surgeries. Naturopathic doctors are growing in numbers, and have practices across the province. They see patients in a responsive way and work in partnership with other regulated health providers to positively affect the health of Ontarians.

The regulation of NDs under the *Regulated Health Professions Act* (RHPA) is a decision beneficial to Ontarians and practitioners, as NDs are poised to participate as primary healthcare providers in Ontario.

Regulation of NDs under the RHPA will:

1. Provide the public with another safe and accessible care option in the healthcare system. Preventive healthcare is a priority for Ontario and naturopathic doctors are key players in this regard.
2. Encourage even more collaboration between NDs and other healthcare providers. It would assist the government in its goal of setting up integrated healthcare teams. Regulation of naturopathic professionals would provide more access to primary healthcare for Ontarians who may not be able to access the care of a family physician in their community. Naturopathic doctors are poised to strengthen and address the issues facing the current primary healthcare system by providing collaborative, responsive and effective care.
3. Strengthen the relationship between naturopathic doctors and other primary healthcare providers, which would be of direct benefit to the increasing numbers of Ontarians who are already choosing to work with naturopathic doctors and physicians in healing and preventing diseases.
4. Assist Ontario in addressing the shortage of family physicians, as naturopathic doctors can and do diagnose and treat a myriad of diseases that otherwise would fall to already over-burdened family physicians.
5. Provide significant savings to the healthcare system as millions of dollars now spent on primary healthcare could be redirected to other areas of need. NDs provide more early detection and treatment of diseases that otherwise could cost the system untold millions if treated in their latter stages. For example, the two leading causes of death in Ontario (cardiovascular disease and cancer) are widely considered preventable. Naturopathic doctors can play a role in preventing the occurrences of these diseases.
6. Encourage more individuals to enter the profession further reducing pressure on other primary healthcare providers and strengthening the province's healthcare system overall.

Each year, the Canadian College of Naturopathic Medicine (CCNM) graduates approximately 140 new practitioners, many of whom go on to practice as naturopathic doctors in Ontario. Non-inclusion under the RHPA has been a barrier to integration into the current healthcare framework.

Regulation under the RHPA also increases public awareness and public acceptance of naturopathic medicine as a choice in the healthcare continuum. NDs invest a great deal of time, money and effort in their training and credentialing and it is our belief that regulation under the RHPA will enable naturopathic doctors to establish viable and successful practices in communities across the Province.

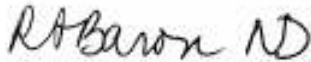
As a result, the Ontario Association of Naturopathic Doctors strongly supports the regulation of naturopathic medicine under the RHPA.

THE NEED FOR REGULATION

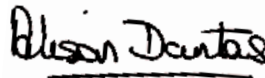
The current legislation that regulates naturopathic doctors, the *Drugless Practitioners Act* (DPA), is antiquated and no longer provides appropriate protection to the public, nor is it consistent with the principles and objectives of the RHPA. It is critical that regulation of naturopathic doctors ensures patient safety. The profession itself endorses this point of view with 80% of naturopathic doctors endorsing RHPA regulation as the best direction for the profession. The DPA inhibits the regulatory board's ability to effectively address complaints and discipline. Naturopathic doctors are primary care providers and patients must have the ability to have their complaints heard by a self-regulated body that can appropriately assess the need for remediation, mediation, or discipline. Equitable regulation of healthcare professions under one Act (the RHPA) provides the public with consistent mechanisms to address breaches in standards. There can be no question that the public's confidence is increased greatly when primary healthcare practitioners are regulated consistently by the government.

As well, currently in Ontario, some individuals may mislead the public by identifying themselves as a naturopath, natural health provider, doctor of natural medicine or naturopathic doctor when they are not. The existing regulation is powerless to address the issue of unregulated practitioners misrepresenting themselves as naturopathic doctors. It is critical that the term "Naturopathic Doctor" and its derivatives be restricted to those who meet the educational and training requirements to be registered as Naturopathic Doctors in Ontario.

Respectfully Submitted:



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Past Chair



Alison Dantas
CEO