



**‘Consultation on a Draft Controlled Acts Regulation’**

Submission to the Transitional Council of the College of  
Naturopaths of Ontario

by

The Registered Nurses’ Association of Ontario (RNAO)

September 2013



# **RNAO's Submission to the Transitional Council of the College of Naturopaths of Ontario**

## ***'Draft Controlled Acts Regulation'***

The Registration Nurses' Association of Ontario (RNAO) is the professional association representing registered nurses (RNs) working in all roles and sectors in Ontario. Our mandate is to promote healthy public policy and the role of nurses in shaping and delivering health services now and in the future. RNAO is pleased to provide a written submission to the Transitional Council of the College of Naturopaths of Ontario as part of the consultation process on a proposed controlled acts regulation.

RNAO strongly believes that the sustainability of Ontario's health system is dependent upon evidence-based practice and policy and the full scope of practice utilization of all regulated health professionals. RNAO values the importance of complementary therapies and establishing/regulating the role of the naturopathic doctor (ND) within Ontario's health system. We envision naturopathic practice as a distinct complement to the practice of nursing, medicine, pharmacy and other professions. This is consistent with the scope of practice statement for NDs included as Section 3 of the *Naturopathy Act*:

The practice of naturopathy is the assessment of diseases, disorders and dysfunctions and the naturopathic diagnosis and treatment of diseases, disorders and dysfunctions using naturopathic techniques to promote, maintain or restore health.

However, RNAO is greatly concerned that a number of elements within the draft Controlled Acts Regulation blur the line between the unique competencies of NDs and the practice of naturopathy, with the competencies of nurses, physicians and other health professionals.

Applying a patient safety perspective, RNAO is concerned with the proposed listing of drugs/substances that NDs would be permitted to administer, prescribe, compound, dispense and sell. There are number of drugs/substances included that, when used incorrectly, could lead to permanent injury or death. Moreover, the side effects of many of the proposed drugs/substances included can be significant and it is unclear how these drugs/substances relate to the practice of naturopathy. **RNAO strongly recommends that the Transitional Council produce strong scientific evidence for the inclusion of drugs/substances within the regulation as they relate to the practice of naturopathy and patient safety.**

Continuing to apply a patient safety perspective, RNAO is concerned with the proposed listing of laboratory testing that NDs would have access to ordering/performing. RNAO is concerned that many of the tests are outside of the scope of practice of the ND, especially when determining: when to initiate the test, how to interpret results and when/how to arrange referral. Many of the proposed tests included in draft regulation require follow-up by a nurse practitioner, registered nurse or physician and this may lead to a concerning fragmentation of care delivery. **RNAO strongly recommends that the Traditional Council produce strong scientific evidence for the inclusion of laboratory testing as related to the practice of naturopathy and patient safety.**

In addition, given the time of significant fiscal restraint, RNAO questions whether it would be appropriate to provide NDs with access to Ontario's public laboratory system. Access to this system is restricted to specific professions possessing a high degree of competency, knowledge and skills in diagnostic testing to ensure patient safety while avoiding duplication/unnecessary resource utilization. **Therefore, RNAO further recommends that a comprehensive review be conducted to determine the efficacy, from a health system resource utilization perspective, of enabling NDs to access Ontario's public laboratory system.**

Reflecting on the formal establishment, regulation and evolution of the extended class of nursing within Ontario since 1997, RNAO and stakeholders have provided an overwhelming wealth of scientific evidence to substantiate the safety and effectiveness of the Nurse Practitioner role. There is a significant gap of evidence in the draft regulation being considered by the Transitional College of Naturopaths of Ontario. While RNAO values the role of NDs, we cannot support the regulation as it currently stands in the absence of evidence to validate the role functions presented. RNAO trusts that a revised draft regulation can be prepared that aligns with the distinct and valuable role of NDs, while being supported by evidence.

Once again we appreciate the opportunity to review the draft regulation and please feel free to contact Tim Lenartowych, Special Projects Manager – Office of the CEO with any questions related to this submission (416-408-5615 | [tlenartowych@rnao.ca](mailto:tlenartowych@rnao.ca)).