



The College of Naturopaths of Ontario

Sent via Email to: cam@cpso.on.ca

May 3, 2019

College of Physicians and Surgeons of Ontario
80 College Street
Toronto, ON
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To Whom It May Concern:

RE: Consultation Feedback on CAM Policy

Thank you for the opportunity to provide feedback about the CPSO's policy on Complementary/Alternative Medicine (CAM). A number of changes have occurred in Ontario health regulation since this policy was last reviewed. These changes include the proclamation of the acts of five new health regulatory colleges, all of which in some way, shape, or form may be considered CAM.

As the landscape for health care in Ontario is changing and increasing numbers of patients are choosing to access "Alternative Medicine"¹, the College of Naturopaths of Ontario believes the consultation on the CAM policy provides an ideal opportunity for the CPSO to demonstrate its leadership and meet its objects outlined in the RHPA, specifically "...to enhance interprofessional collaboration, while respecting the unique character of individual health professions and their members."

The College of Naturopaths is not commenting on specific wording, but identifies a number of general themes we encountered when the Council reviewed and discussed this consultation.

Definitions of Conventional and Alternative

Generally speaking the terms and definitions of conventional vs complementary/alternative medicine are antiquated and tend to raise more questions than answers. These definitions also raise questions about what defines the line is between conventional and "alternative" medicine. For example, is the recommendation of vitamin D considered to be "alternative"? What about any recommended treatment outside published guidelines (e.g., *Treatment of Hypertension in Association with Ischemic Heart Disease*)?

The definitions also reference traditional medicine or science-based medicine as conventional. However, many CAM treatments are very traditional, in addition to being science and evidence-based. The definitions go on to note that CAM practices may become incorporated into

¹ <https://www.fraserinstitute.org/sites/default/files/complementary-and-alternative-medicine-2017.pdf>

conventional medicine. However, this statement raises additional concerns about who is making these determinations and how this is communicated to both the profession and public.

The College of Naturopaths of Ontario recommends that the CPSO consider reviewing the definitions in the policy to ensure they are modernized and reflect current practice.

Lack of promotion of referrals and interprofessional collaboration

The College of Naturopaths of Ontario believes that the review of this policy is an opportunity for the CPSO to reinforce the importance of, and encourage the use of, referrals and interprofessional collaboration with regard to regulated “CAM” practitioners.

Patient safety is put at risk when they feel discouraged or afraid to speak with their medical doctor about “CAM” treatments they are receiving for fear of reprisal. This policy presents an opportunity to encourage interprofessional collaboration, cooperation, cross referrals, and general dialogue with other regulated health professionals. As outlined within the policy “the College does not expect physicians to be knowledgeable about every CAM modality or treatment their patients may be pursuing or may wish to pursue.”

CAM modalities or treatments that are outside a physician’s knowledge, skill and judgment provide ideal opportunities for cooperation and communication with other practitioners for the purposes of education and understanding, in support of the ultimate goal of protecting the patient.

The College of Naturopaths of Ontario recommends that the CPSO consider including a section in the policy encouraging conventional medicine providers to open lines of communication, dialogue, and interprofessional collaboration with regulated CAM providers.

Lack of differentiation between “CAM” providers

The College of Naturopaths of Ontario noted that the policy does not mention regulated health providers who may provide complementary/Alternative Medicine. As previously noted, the landscape of regulated health has changed significantly since this policy was last reviewed and updated in November of 2011. A number of new professions which may be considered CAM have become regulated.

The College of Naturopaths supports health regulation for the people of Ontario and the addition of more “CAM” professions in that this affords public protection to patients should complaints or concerns arise. Conventional Medicine providers should be encouraged to collaborate with other regulated professionals and, when making referrals, to ensure that they are made to an individual who is registered with an Ontario health regulatory college.

The College of Naturopaths of Ontario recommends that the CPSO include a distinction between regulated and non-regulated providers.

Tone

In general, the College of Naturopaths of Ontario was very aware of the perceived tone of the current policy. Our overall impression is that this policy does not help to break down the

barriers of interprofessional collaboration, but rather reinforces a bias about “Alternative health practitioners” and instils fear i) into the public for discussing CAM with their conventional provider, and ii) into the physician who may consider referring to a CAM provider.²

The College of Naturopaths recommends that the policy be reviewed to encourage more interprofessional collaboration between practitioners, and to lend itself to more cross-communication between practitioners about treatment options.

Conclusion

The College of Naturopaths of Ontario thanks the CPSO for the opportunity to provide feedback on its current consultation. We believe that this is an excellent opportunity to break down barriers which discourage interprofessional collaboration and to demonstrate how regulated professionals can collaborate in providing care that is in the ultimate interest of their patients. We are excited about what the future may bring and how we can work cooperatively to support the people of Ontario in receiving safe, competent and ethical care.

Sincerely yours,
College of Naturopaths of Ontario

² <https://www.fraserinstitute.org/sites/default/files/complementary-and-alternative-medicine-2017.pdf>