

CPSO Policy Consultations

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**Submission to Consultation on Complementary/Alternative Medicine Policy**

May 5, 2019

To Whom It May Concern,

On behalf of the Ontario Association of Naturopathic Doctors, I very much appreciate the opportunity to provide comment for CPSO's review of the current policy (2011 version) on Complementary/Alternative Medicine.

Our specific interest here are in the aspects of the policy which focus on (i) physicians who practise conventional medicine, but whose patients pursue CAM; and (ii) physicians who wish to form professional affiliations with CAM clinics, therapies, or devices. We do not believe it is our place to comment on CPSO's expectations for physicians who practise complementary and alternative medicine (CAM).

Since 2015, when the regulation of Naturopathy in Ontario was brought under the Regulated Health Professions Act, we have seen an increase in collaboration between naturopaths and physicians. There are many examples of physicians and naturopaths working together in the same clinic, some of naturopaths working in hospitals, but much more regularly naturopaths and physicians now refer patients to each other.

Indeed, many physicians refer patients to naturopaths, but certainly it is not the majority of physicians. On the other hand, all naturopaths in Ontario refer patients to physicians. In fact, this is mandated. If a naturopath suspects that a patient has a condition that is out of their scope of practice, a referral to a practitioner with that scope (usually a physician or nurse practitioner) is required.

There is currently no formal referral process, like there is say between family physicians and specialists. These referrals take different forms, ranging from referral notes about the patient's symptoms/condition written by the naturopath to the MD, to the naturopath simply informing the patient that they must see a physician or nurse practitioner, either for direct treatment or possible referral to a specialist.

As you might expect, the physicians' responses are considerably varied. An educated guess is that many have little understanding of what naturopathic medicine involves. For that reason, or because of specific preconceptions, many MDs still do not respond well to a naturopath's initiatives to communicate, and this is not in the patient's best interest.

We believe that developing a common language or “currency” for referrals from naturopaths to physicians, like the provision of lab test results as an example, may make this process better for the patient and easier for practitioners on both sides of this referral.

Generally speaking, we are in support of CPSO’s Complimentary/Alternative Medicine Policy and would like to offer a few suggestions to make it even better and more patient protective.

In the “Terminology” section of the policy, Complimentary/Alternative Medicine (CAM) is referred to as “a group of diverse medical practices and products that are not generally considered part of conventional medicine...” That is true, but there is no room in this definition for differentiation between CAM that is regulated in Ontario under the RHPA, and unregulated CAM with no rules and few provisions for patient protection. We think that recognizing this difference may provide more clarity to your members.

We like the “Principles” and professional expectations that are set out in the policy, but are not convinced that they are being fully understood or adhered to. Surprisingly regularly our members get reports from patients that their CAM interests are not respected by their physician, and in some cases that they are being shamed by their physician for seeing a naturopath. This is not helpful, or in the words of the policy, is not “respecting patient autonomy”. This can also promote the opposite of what those practitioners may want to achieve, by having patients who want to see a regulated CAM practitioner begin to shy away from their MD because of this. Neither of us want CAM patients to avoid their MD for fear of being shamed.

We are cognizant, from dealing with our own regulatory college’s processes, that engaging about practitioners’ conduct is a sensitive matter, but we do have a few comments on your “Specific Expectations for Physician Conduct”.

With respect to Clinical Assessment and Diagnosis: In the process of determining their own treatment protocol, if physicians have any doubts about another practitioner’s clinical assessment (CAM or conventional), of course they should err on the side of caution and conduct their own clinical assessment. We also fully support your provision that physicians must have complete, accurate information about their patients and that this include information about complimentary or alternative treatments.

As the policy states, “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.” Taken to its logical conclusion then, if the patient is undergoing a regulated CAM treatment (e.g., for another condition) that is not relevant to the physician’s planned treatment protocol, or if the physician is not knowledgeable about that CAM treatment, the physician should surely avoid comment to the patient about their CAM treatment. That’s not clear in the existing policy.

The policy requires that when physicians discuss CAM with patients that they do so in a professional manner, within the limits of their knowledge, skill and judgment. We believe that this is a very important principle that may require emphasis.

Naturopaths will of course do the same when discussing conventional medicine, but the difference is that naturopaths are not permitted, by our regulator, the College of Naturopaths of Ontario, to engage with patients on matters related to conditions that are out of a naturopath's scope of practice.

Thank you again for the opportunity to comment on this important CPSO policy. If you have any questions or if I may be of further assistance in any way, please do not hesitate to contact me.