



November 25, 2020

CPSO's consultation on Third Party Medical Reports – General Consultation

The Ontario Homeopathic Medical Association (OMHA) welcomes and appreciates the opportunity to provide comments and make a submission of thought in response to the CPSO's consultation on its Delegation of Controlled Acts Policy. We thank you for the extension provided for responding.

The Ontario Homeopathic Medical Association (OMHA) was recently formed by amalgamation of two homeopathic associations, the Homeopathic Medical Association of Canada, and the Ontario Homeopathic Association in the year 2018. Homeopathic regulated professional in Ontario was established in 2015, under the Ministry of Health and Long-Term Care of Ontario and our regulatory College of Homeopaths of Ontario.

Homeopathy has a historical connection with CPSO. The Homeopathic Medical Society of Canada was established in 1854 in Hamilton, Ontario, comprising all the prominent homeopaths in Upper (Ontario) and Lower Canada (Quebec). In 1869, Ontario passed the Ontario Medical Act establishing a single unified College of Physicians and Surgeons of Ontario (CPSO) as the examining board for all medical practitioners. This united the three separate examining boards- eclectic, allopathic and homeopathic. Homeopaths were represented with five members on the council of the CPSO until 1934, when the number was reduced to one homeopath.

With change underway and a renewed commitment to improving patient care, now is the time to rethink and reshape using all the tools at hand. Homeopaths are already a vital part of health care in Ontario, and their patients represent every walk of life. It is your duty as regulators to focus on what can be achieved when all providers work together in an inclusive system unimpeded by avoidable obstacles.

The Four Questions that we considered were:

1. Does the draft policy serve and protect the public interest
2. Does the draft policy contain practical expectations for physicians?
3. Does the draft policy strike the right balance between serving and protecting the public interest and being practical for physicians?
4. Are the draft policy expectations proportionate to the level of risk physician participation in third party processes for patients and individuals?





The OHMA perspective:

A patient's bill of rights is a list of guarantees for those receiving medical care. It may take the form of a law or a non-binding declaration. Typically, a patient's bill of rights guarantees patients information, fair treatment, and autonomy over medical decisions, among other rights.

As a homeopathic association, we represent our membership. Our membership are professional regulated healthcare providers, called homeopaths (HOM). Our homeopaths have great professional skill and technique in patient case taking.

Our challenge soon will be to educate other health care professions on the value of the having all the facts to base intervention on a patient situation.

Third party reports will be valuable in the future to multidisciplinary healthcare provider teams.

