

Dr. Nancy Whitmore
Registrar & CEO
College of Physicians and Surgeons of Ontario
80 College Street
Toronto, ON M5G 2E2

Date FEB 16 / 21

Dear Dr. Whitmore,

I am writing to you with an urgent request to reconsider the proposed changes to the CPSO's policy on Complementary and Alternative Medicine (CAM).

I am a patient who has experienced life-changing benefits from Complementary and Alternative Medicine. I have recently learned that the CPSO has proposed revisions to its existing CAM policy which will make it extremely difficult for Integrative Medicine physicians to practice without the fear of being disciplined by the CPSO. The changes will rob patients of their right to obtain the care that they need and want. It will also stifle innovation in the Ontario healthcare system.

There are **significant issues** with the new draft of the policy that discriminates against physicians using CAM. I understand the policy was drafted by a working group, none of which were physicians who actually practice CAM. To highlight a few of the issues:

1. **Increased Evidentiary Requirements for Physicians using CAM:** The new CAM policy will require physicians to only provide treatments that are **supported** by evidence and scientific reasoning. This language replaces the more lenient term of "**informed by**" in the previous policy - which is the same language used in policies in BC, Alberta, Saskatchewan, Nova Scotia and Newfoundland & Labrador. The new policy explicitly outlines a hierarchy of evidence, with randomized control trials being at the top and case-control studies, case reports, and editorials/expert opinions deemed to be of lower quality evidence. Shared clinical experience and positive patient outcomes is not an acceptable form of evidence.

There is one troubling issue with the above requirement: Many natural treatments will never be substantiated by the level of evidence that the new policy requires because they are not patentable. Natural substances/non patentable treatments will rarely obtain the financial backing to allow for costly large-scale clinical trials. No patent, no profit, no proof. CAM physicians often apply therapies that are outside the box to help medically challenging patients, and thus often rely on collective experience and previous patient outcomes to approach such patients.

1. **Unreasonably burdensome documentation requirements:** The new policy requires CAM physicians to document the evidence-based rationale and risk benefit analysis for every single treatment they provide. It is not logistically sustainable in a busy practice and conventional physicians are spared from these requirements. This would act as yet another deterrent to physicians from using CAM and is another example of the discriminatory nature of the policy.
1. **Omission of Section 5.1 of the Ontario Medicine Act:** This provision states that "physicians shall not be found guilty of professional misconduct or incompetence solely on the basis that they

practice a therapy that is non-traditional or that departs from the prevailing medical practice.” This Section is included in the current policy yet is entirely omitted from the new policy. This sets a deeply concerning tone for the entire policy.

It would be ideal if conventional medicine had answers for all ailments. Unfortunately, this is not the case. The new policy prevents a conscientious physician from trying his or her best to “problem solve” using all methods available.

If the new policy is adopted, physicians will be prevented from using natural and innovative treatments that have helped thousands of people like me. Irrespective of their safe and effective benefits to patients, natural treatments will always be considered “unproven” and therefore, disallowed. Physicians will inevitably be forced to prescribe only pharmaceutical drugs.

We should be encouraging (not prohibiting!) physicians to explore all safe and effective options for patients. If physicians are forbidden from thinking and acting ‘outside of the box’ for the benefit of their patients, this will silence innovation in the Ontario medical system.

Dr. Whitmore, I am not asking you to unreasonably intervene with the CAM Policy Working Group’s autonomy. I am simply asking you to uphold an existing Ontario law: Section 5.1 of the *Medicine Act*. The CPSO’s proposed revision, which would discipline physicians who use treatments that depart from prevailing medicine, is a clear contravention of Section 5.1.

There is also clear case law stating that the majority in a profession ought not to be allowed to stifle the creativity and innovation of the minority (*Brett et al. v. Board of Directors of Physiotherapy*). The CPSO’s proposed revision is allowing the majority (i.e., conventional practitioners) to stifle the creativity and innovation of the minority (i.e., physicians using complementary and alternative medicine treatments).

Sincerely _____

Name. _

Address: _
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c.c.: Honourable Christine Elliott, Minister of Health

MPP _____

Canadian Civil Liberties Association.