

Response to the Health Professions Regulatory Advisory Council

Physiotherapy Scope of Practice Submission

The Ontario Association of Naturopathic Doctors is pleased to provide a brief response to the submission from the Physiotherapy profession for HPRAC's scope of practice review.

Ontario's Naturopathic Doctors (NDs) support the principle of regulated health professionals being able to practice to the full extent of their competency within their scope of practice. The submissions from each profession show the evolving role and increasing competency of allied health professions. Addressing this challenge will contribute to more effective inter-professional collaboration, better utilization of health human resources and improved access to care for Ontarians.

Achieving this vision requires viewing each profession's scope of practice and authorized acts as dynamic. The scope of practice review provides this opportunity to determine the potential for regulated health professions to increase their contribution, remove existing regulatory and legislative barriers, and also identify related health professions that should also have their scope and authorized acts changed in parallel.

The submission from the Physiotherapy profession provides a clear and compelling vision of the importance of a measured increase in autonomy for regulated health professions within their scope of practice and competence of the individual practitioner. Given the continuing pressures in the health care system, and the increasing capability of regulated practitioners, the regulated scope and controlled acts should be seen to be continuously open to review rather than treated as fixed.

Substantial Overlap of Scope

There is a substantial overlap in the scope of practice and education and training of Naturopathic Doctors and Physiotherapists. Naturopathic medicine modalities include physical medicine, spinal manipulation and acupuncture.

Currently, NDs face substantial barriers in the health care system to being able practice to the full extent of their scope and training, particularly in hospitals, Community Health Centres and collaborative care teams, limiting the potential contribution of NDs addressing the care needs of Ontarians. The *Naturopathy Act*, and the move of the regulation of NDs into the *Regulated Health Professions Act* framework, will address the largest barrier NDs face. However, it is important to avoid any future restriction on the contribution of NDs to the health care system by ensuring that any changes to the scope of practice of Physiotherapists or change of status in other legislation are also considered for Naturopathic Doctors.

Comments on the Physiotherapist Submission

Scope of Practice

It is important for each regulated health profession in Ontario to have a concise scope of practice statement that accurately captures the regulated activities of that profession. Mobility and health may be the outcome of physiotherapy, but it may be that these concepts are overly general to be included in a scope statement.



Diagnosis

The proposal for Physiotherapists to communicate a diagnosis within their scope of practice is warranted.

Treating a Wound

It would be a concern if the wording of this proposed controlled act for Physiotherapists inadvertently restricted the wound care that other professions currently provide that is not below the dermis. If cleansing, soaking, irrigating, probing, debriding, packing or dressing the wound are indeed subdermal, then the proposal in the Physiotherapist submission appears warranted, and this same controlled act should also be awarded to NDs, who are fully trained to provide this kind of care.

Administering a Substance by Inhalation

Given that Physiotherapists have been awarded the controlled act of tracheal suctioning, it appears warranted that they be able to administer oxygen on their own authority.

Awarding the controlled act of administering substances ordered by another authorized profession is also warranted, and recognizes the increasing competency of regulated health professions and the ability to assume increased responsibility. Standards of practice would be required to ensure that Physiotherapists are only administering substances where they have established competency.

Inserting an Instrument, Hand or Finger

The proposal for Physiotherapists to undertake this controlled act appears warranted.

Ordering Diagnostic Forms of Energy

It is in a patient's interest that professions with the controlled act of diagnosis should be able to order the use of forms of energy that will support making an accurate diagnosis. Naturopathic Doctors also require access to this controlled act for similar reasons.

Proposed Legislative Changes

The legislative changes proposed in the Physiotherapist Submission are reasonable, and recognize the importance in a well-functioning interprofessional team of ensuring that each profession can contribute to the extent of their scope and competence.

Because NDs have been regulated outside the RHPA framework, the profession to date has not had the opportunities to become more integrated into the health care system.

The legislative barriers identified in the Physiotherapist submission also limit the potential role of NDs. The *Healing Arts Radiation Protection Act*, the *Laboratory and Specimen Collection Centre Act*, and the *Public Hospitals Act* should be amended to recognize the role of Physiotherapists and at the same time also add other regulated professions that have the training and competence to undertake these proposed functions, including Naturopathic Doctors.

We welcome this opportunity to contribute to HPRAC's efforts in support of improved interprofessional collaboration. We would welcome the opportunity to discuss this submission and any other related matter with you, and to continuing this process of ensuring that each regulated health profession is able to make their strongest possible contribution to the health of Ontarians.