

## Response to the Health Professions Regulatory Advisory Council

### Dietetics Scope of Practice Submission

The Ontario Association of Naturopathic Doctors is pleased to provide a brief response to the submission from the Dietetics 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.

### Substantial Overlap of Scope

Nutritional medicine is one of six modalities of Naturopathic Doctors in Ontario. The scope of practice and education and training of Naturopathic Doctors in nutritional medicine substantially overlaps with Registered Dietitians.

Currently, NDs face substantial barriers in the health care system to being able to 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 Registered Dietitians or change of status in other legislation are also considered for Naturopathic Doctors.

### Comments on the Dietician 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.

Most professions also undertake a role in public policy development and population health related issues. However, these activities should not be part of the regulated activity of practitioners, or in any way restrict other unregulated persons from fulfilling this role.

As a result, it may not be appropriate to include elements related to population health or the management of food systems in the scope statement of Registered Dietitians. On the other hand, if this is appropriate to include, then other health professions should also be asked to submit proposals to broaden their scope statements to include these kinds of unregulated activities.

The proposal that the scope of practice of Registered Dietitians include the concept of “related means” does not provide clarity about the limits of the scope of the profession.

***Controlled Act 1: Diagnosis***

The *Naturopathy Act* awards NDs the controlled act of communicating a diagnosis. While the motivation for Registered Dietitians seeking to be able to communicate a diagnosis made by another profession is understandable in the interest of patient care, appropriate practice by NDs indicates that NDs themselves should have communicated any diagnosis in a way that is understandable to the patient. If there is uncertainty for the patient, a Registered Dietitian should consult or refer the patient back to the ND. It may be appropriate for the ND to be able to delegate the communicating of a diagnosis to a Registered Dietitian in some circumstances. This issue can be considered by the Transition Council for Naturopathic Doctors in establishing the new standards of practice for the profession.

***Controlled Act 2: Procedures below the dermis***

The proposal for Registered Dietitians to perform skin pricking in order to undertake blood tests within their scope is fully appropriate.

***Controlled Act 8: Prescribing or dispensing, specifically for the adjustment of insulin and oral hypoglycemic regimens***

It would appear to be a change in approach for a regulated profession that does not have their own authority to prescribe to be able to adjust the dosage of a medication prescribed by another profession.

NDs frequently encounter patients who require insulin adjustment. In these circumstances, NDs currently will make a recommendation to the patient and/or practitioner. This approach ensures there is full communication of the patient’s dosage. Enabling other professions to make adjustments where warranted can be achieved through existing mechanisms which require additional communication between practitioners that is likely to improve patient safety and interprofessional collaboration.

Ontario’s Naturopathic Doctors have identified a strong need to be awarded prescribing rights to maintain access to substances that are integral to naturopathic medicine in a constantly changing regulatory environment. If HPRAC recommends the change in approach proposed in the Dietitian submission, then it would be appropriate to ask the Transition Council for Naturopathic Doctors to recommend a similar approach to permit NDs to make adjustments in dosage for those substances prescribed by other regulated professions.

***Controlled Act 14: Psychotherapy***

Naturopathic Doctors share the concern of Registered Dietitians about the potential for the new controlled act of Psychotherapy to inadvertently impact the use of psychotherapy techniques in counselling patients. The ability to provide counselling can be essential to patient care in nutritional medicine. If there is a continuing lack of clarity about this controlled act, and specifically what therapies may become restricted, the Minister of Health and Long-Term Care may want to seek HPRAC’s assistance in determining which professions should be awarded this controlled act.

***New Controlled Act: Prescribing and managing enteral and parenteral nutrition***

Parenteral therapy (which includes parenteral nutrition) is within the scope of practice of Naturopathic Doctors. The vitamins, minerals and other therapeutic natural substances administered by NDs have a nutritional effect. NDs do not administer total parenteral nutrition where patients are entirely dependent on this route of administration of nutrition. If HPRAC gives further consideration to this new controlled act, it is important that the term “total parenteral nutrition” be used to avoid restricting other nutrition that is administered parenterally.

If this controlled act does become established, then NDs have the education and training to be awarded it, subject to standards of practice of the profession that would restrict this activity to NDs who have established and maintained competence.

***New Controlled Act: Prescribing and managing therapeutic diets***

If this controlled act does become established, then NDs currently have the education and training to be awarded it. Nutritional medicine is an integral part of the scope of practice of NDs.

***Proposed Legislative Changes***

The legislative changes proposed in the Dietician Submission are reasonable, and recognize the importance in a well-functioning inter-professional 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 barriers identified in the Dietician submission also limit the potential role of NDs. The *Public Hospitals Act*, the *Laboratory and Specimen Collection Centre Act*, the *Health Care Consent Act* and the *Long-Term Care Act* should be amended to recognize the role of Registered Dietitians 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.