

CNPBC Frequently Asked Questions

Prescribing

SLIDE 3

Can I prescribe medications to an out of province patient or by telemedicine?

NDs in BC who have their prescribing authority are only permitted to prescribe medications to patients within BC. This means you cannot prescribe medication to an out of province patient, this includes if you are treating a patient by telemedicine. If you are treating a BC patient by telemedicine you can prescribe medications that are within the prescribing authority of NDs, but you must ensure that you are still meeting the standard of care, e.g., ensure appropriate labs are ordered if it is necessary to do so. If an ND is treating a patient by telemedicine and considers the patient should have an in-person assessment before prescribing medication, the ND should arrange for an in-person appointment and assessment.

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How do I know if a drug is within the prescribing scope of practice for an ND?

This is a process of elimination. Firstly, NDs should check whether the drug they wish to prescribe is an excluded drug listed on pages 15 – 20 of the prescribing scope of practice document that is published on the website. If the drug is not an excluded drug, you should check to determine it is not listed under the Controlled Drugs and Substances Act. All drugs listed under the Controlled Drugs and Substances Act are excluded from the prescribing scope of practice of NDs. Finally, you should check to see if it is an excluded drug in Schedule 1 of the Naturopathic Physicians Regulation. If the drug is not listed as an excluded drug in any of these documents, it is within the prescribing scope of practice for NDs. You can always email the College to double check the status of a drug before prescribing it.

COVID-19 Masks

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Can I create and enforce a mask policy for my clinic and refuse to see patients if they do not wear a mask?

NDs are entitled to create business policies and this is not a matter for the College. However, if you are going to create a business policy that requires patients to wear a mask and refuse to

treat patients who do not wear a mask, you should be aware of potential human rights complaints and seek legal advice, particularly in situations where a patient has a medical exemption for not wearing a mask. For information on the provincial health orders regarding the masking mandate see here: <https://www2.gov.bc.ca/gov/content/covid-19/info/restrictions>.

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As an ND treating patients, am I required to wear a mask?

NDs are required to comply with all Provincial Health Orders:

<https://www2.gov.bc.ca/gov/content/covid-19/info/restrictions>. Yes, NDs and clinic staff must always wear a mask when they are in the clinic, especially when providing in person care.

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As an ND, am I permitted to provide a medical note exempting a patient from wearing a mask for a medical reason?

Yes, NDs are permitted to provide a patient with a medical note exempting the patient from wearing a mask provided you are treating the patient for that medical condition. For example, if you are only providing IV treatments to a patient and they request a medical note to exempt them from wearing a mask for an asthma condition, then it may not be reasonable to provide a medical note in that circumstance as the ND is not treating the patient for the asthma condition.

COVID-19 Vaccines

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Can NDs administer the COVID-19 vaccine?

Some naturopathic doctors may be eligible to register with the health authorities to be an immunizer and administer vaccines at designated clinics under the direction of the health authority. At this stage, NDs are not permitted to administer the COVID-19 vaccine in private clinics. To be an immunizer an ND must have the following training:

- a. Complete the BCCDC Immunization Course (takes 15 hours) (<http://www.bccdc.ca/health-professionals/education-development/immunization-courses/immunization-competency-course>). Once this course has been completed NDs need to apply to the College for their Immunization Certification and a certificate will be issued;

- b. Complete the BCCDC COVID-19 training webinars (takes 1 hour)
(<https://learninghub.phsa.ca/Courses/24764/curriculum-bccdc-covid-19-immunization-webinars>):
 - i. COVID-19 vaccine overview;
 - ii. COVID-19 mRNA vaccines; and
 - iii. Viral vector vaccines COVID-19.
- c. Registrants must also complete the reading material relevant to administering the COVID-19 vaccine found on the BCCDC website here: http://www.bccdc.ca/resource-gallery/Documents/Guidelines%20and%20Forms/Guidelines%20and%20Manuals/Immunization/Vaccine%20Info/Education_Recommendations_COVID-19_Immunizers.pdf.

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When will NDs be eligible for the COVID-19 vaccine?

The decisions on how and when health care professionals in BC are eligible to receive the COVID-19 vaccine is made by the Ministry of Health and Health Authorities. Some Health Authorities have started offering vaccines to naturopathic doctors providing front line care. The Health Authority will notify the College when NDs in their region are eligible and the College will then issue a communication promptly, to the profession. This communication will contain information on how NDs can register to receive the vaccine.

COVID-19 Tests, Diagnosis and Treatment

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Can naturopathic doctors requisition a COVID-19 antibody test for patients?

No. The communication that was issued by the College on December 22, 2020 remains in effect. This includes antibody tests from all sources not just lifelabs. We understand that Pure Pharmacy is offering to sell NADAL COVID-19 Antibody Tests to NDs and this communication applies to those tests as well. This communication is published on the COVID-19 page of the website: <https://cnpbc.bc.ca/wp-content/uploads/Notice-to-Registrants-COVID-19-Antibody-Tests.pdf>. If this position changes, a communication will be issued to the profession.

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Can naturopathic doctors refer patients to be tested for COVID-19 and can they diagnose and treat COVID-19?

Patients do not require a referral to be tested for COVID-19. Follow BCCDC protocols on testing found at <http://www.bccdc.ca/health-info/diseases-conditions/covid-19/testing/testinginformation>. NDs are not permitted to provide any treatment to patients suffering from COVID-19 and should not advertise unproven therapies or treatments for COVID-19.

COVID-19 Exposures

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What do I do if I (as the ND), a staff member or a patient tests positive for COVID-19 or have been potentially exposed?

You can find helpful information on how to proceed on the HealthLink website: <https://www.healthlinkbc.ca/self-isolation-and-covid-19> as well as the websites for each Health Authority.

Telemedicine

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Are there different rules or restrictions on practice when treating via telemedicine?

The College has a telemedicine standard that is published on the College website: <https://cnpbc.bc.ca/wp-content/uploads/Standard-of-Practice-on-Telemedicine-March-20201.pdf>. This standard was updated in March 2020. Registrants who are practising using telemedicine are still required to meet the same legal, professional, and ethical obligations they would be required to meet if providing in-person treatment. It is not acceptable for registrants to only provide telemedicine treatment and refuse to provide in-person treatment, as in-person treatment may be required.

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Can I treat patients outside of BC using telemedicine?

If you are going to be treating patients outside of BC using telemedicine, it is your responsibility to ensure you check with the regulatory college of that other province or state to ensure you

can practice naturopathic medicine. For example, NDs in BC are not permitted to provide any treatment to patients in Ontario (even by telemedicine) because it constitutes practicing naturopathic medicine in Ontario and you are required to be registered with the College of Naturopaths of Ontario.

Use of Titles

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Can naturopathic doctors use the title ‘family physician’, ‘family doctor’, ‘family practitioner’, ‘family practice’ or ‘family medicine’ in advertising materials?

No. Naturopathic doctors should not be using the above phrases in their advertising materials as the use of such terms implies that they are a registrant of the College of Physicians and Surgeons. Family is a class of registrants at the College of Physicians and Surgeons as well as mislead the public to infer that they are a medical doctor or registrant of the College of Physicians and Surgeons. However, if NDs use the qualification of ‘naturopathic’ immediately adjacent to the above terms then it is permissible.

Registration

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How much are registration fees?

The College notifies registrants of the annual registration fee for the upcoming year, on or before November 15 of each calendar year. Registrants will be notified by email if there are any changes to the registration fees, and how and when they can renew their registration with the College. Please ensure your email address is up to date on the [Registrant Online Self Service system \(ROSS\)](#), so that the College can effectively provide you with future communications related to this and more.

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Why were registration fees not reduced for 2021?

It is the role of the Board to protect the public. After consultation with other health colleges in BC as well as feedback received from the Ministry it was determined that reducing registrant fees would be in the interests of registrants and not in the public interest. It would have significantly reduced revenue of the College for 2021, which is used to develop process and procedures designed to protect the public and ensure naturopathic doctors practice safely, ethically and competently.

Certification

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I have completed the course for X certification. What do I do now?

The process of applying for Certifications with the College can be found on the College's website at: <https://cnpbc.bc.ca/for-registrants/resources/certification-requirements/>. Please ensure you provide the applicable application form, evidence of course completion, and ensure that you have either provided, or uploaded a copy of your current advanced life support training (NALS).

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How many treatments do I need to get CE currency for my certification(s)?

For Category E – Certifications, the College has a currency model in which two (2) hours of continuing education in Category E may be claimed for every fifty (50) treatments performed as a practising registrant who is certified in the aspect of practice. To claim these hours, proceed to the [Registrant Online Self Service system \(ROSS\)](#) to download a Certification Tracking Log under the Forms & Resources tab > Continuing Education.

Liquid Rhinoplasty

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Why did the Board make the decision to exclude liquid rhinoplasty from the scope of practice of naturopathic doctors in BC?

The Board conducted a review into the liquid rhinoplasty procedure, following receipt of concerns raised by health care professionals. The Board must consider all procedures that are performed by naturopathic doctors in terms of the risks posed to the public as the Board must act in the interest of the public. The review into the procedure occurred over several months. The Board considered a number of materials and information before making its decision such as expert opinions, current training and education requirements for the procedure, potential complications and risk factors and certification requirements. The decision of the Board is a moratorium. A sub-committee of the quality assurance committee, consisting of naturopathic doctors and public members is being established to conduct a review of the medical literature and research relating to the procedure, as well as reviewing submissions that the quality assurance committee has received from registrants regarding the procedure. Once the sub-committee has reviewed all materials it will make a recommendation to the quality assurance

committee regarding the moratorium. From there, the Board will be presented with the recommendations and a further decision will be made.

If any registrants are interested in providing written submissions regarding liquid rhinoplasty to be considered, please note that you have until July 31, 2021. Submissions are being reviewed on an ongoing basis in the order in which they are received by the committee.

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Does the moratorium regarding the liquid rhinoplasty procedure mean that other aesthetic procedures will be removed from the scope of practice?

At this stage, there are no other aesthetic procedures being considered by the Board for removal from the scope of practice of naturopathic doctors. This may change, should the Board have concerns about a particular procedure resulting in safety concerns for the public. It is important that naturopathic doctors are only performing aesthetic procedures which they are trained and certified to perform and they must do so safely, competently and ethically.

Health Canada Investigations

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The College is aware that a number of naturopathic doctors and clinics have received compliance letters from Health Canada regarding the advertising of natural health products and drugs on their websites. The Board cannot address these issues at this time, but a communication will be issued by the College regarding the advertising compliance requirements involving natural health products and drugs, once Health Canada has completed its compliance reviews.

Role of the College and the Association

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Regulatory colleges and professional associations have different purposes and roles with respect to healthcare practitioners and the public interest. There are good reasons for you to be involved with each. Note that naturopathic doctors are *registrants* of the College and may also be *members* of the Association.

Colleges represent the public interest

The College of Naturopathic Physicians of British Columbia is a regulatory body created by government. It has a legal obligation under the *Health Professions Act* to protect the public through the regulation of naturopathic doctors, its *registrants*. This is done by:

- determining registration requirements
- setting standards of practice
- maintaining a register of naturopathic doctors that everyone can search, and
- addressing complaints from any individual or organization about naturopathic doctors.

Naturopathic doctors who do not meet ethical or practice requirements are investigated, removed from the profession, limited in their ability to practise, or subject to other measures necessary to keep the public safe. By protecting the public in this way, the College maintains public confidence in the profession.

- Registration with the College is a legal requirement to practise naturopathic medicine in BC and use the designations associated with it. The public has the confidence of knowing that only naturopathic doctors registered with the CNPBC—regulated, highly-trained health professionals—can use reserved titles like “naturopathic doctor.”
- Colleges set requirements for individuals to enter the profession, govern their registrants in accordance with the legislation under which they were formed and are responsible for investigating and disciplining registrants when necessary.
- In order to practise naturopathic medicine and call themselves naturopathic doctors, NDs pay a compulsory registration fee to the College each year for the privilege of self-regulation and registration with the College. These fees fund the College’s regulatory activities such as investigations, quality assurance audits, and the setting of standards, among others. When a naturopathic doctor does not pay his or her fees, his or her registration is cancelled, and s/he is not permitted to practise naturopathic medicine or call him or herself a naturopathic doctor.
- Naturopathic doctors contact the College when they need regulatory information, when they are cancelling or renewing registration, when they have questions about continuing education (CE) requirements, when they have an ethical dilemma in practice, when they have a duty to report another healthcare professional, or when they need information about standards of practice or other requirements of naturopathic doctors in BC. They

also interact with the College through regulatory programs, such as practice audits and investigations of complaints.

Associations represent the profession's interest

A professional association, like the BCNA, acts in the interest of its *members*, naturopathic physicians. It promotes the interests of the profession in BC with government and the public.

- Membership in associations is voluntary. Associations do not have legal obligations under the *Health Professions Act*.
- Associations focus on the promotion of the profession and advocacy, including professional image. Associations are self-governing with a board of directors comprised of members. They do not regulate the profession: they do not determine who may or may not be registered as a naturopathic doctor, conduct regulatory programs such as Quality Assurance audits, or investigate naturopathic doctors under the *Health Professions Act*.
- If naturopathic doctors wish to support their Association's activities by becoming members, they pay a voluntary membership fee to the Association. This fee makes it possible for the Association to carry out its activities. If a naturopathic doctor does not wish to support the Association's activities, he or she is not obligated to be a member or pay a membership fee.
- Naturopathic doctors call the Association when they are interested in or concerned about how the profession is being represented or promoted to the public or to government, for business advice, and for other matters related to the promotion of the profession.

Different, but complementary roles

As outlined above, the College and the Association have different yet complementary roles and mandates. The College and the Association respect each other for the work each organization does to benefit the public and the profession, and know that their work must be carried out independently. When both organizations do their jobs well, the public is protected, the profession is well-represented and both the public and government understand the potential benefits of naturopathic medicine and trust naturopathic doctors.

Amalgamation

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As you are aware, on August 27, 2020, the Ministry of Health released its *Recommendations to modernize the provincial health profession regulatory framework*.

<https://www2.gov.bc.ca/assets/gov/health/practitioner-pro/professional-regulation/recommendations-to-modernize-regulatory-framework.pdf>

These recommendations are intended to improve the model of health profession regulation in BC. Included were recommendations to decrease the number of health profession colleges in BC from 18 to 6. It was recommended that the College of Naturopathic Physicians amalgamate with three other colleges, the College of Massage Therapists, the College of Chiropractors, and the College of Chinese Medicine and Acupuncture. This College would be known as the College of Complementary and Alternative Health and Care Professionals. We know the authority to modernize the regulatory framework rests with cabinet and the Legislative Assembly. The Ministry's priorities have had to shift a bit with the COVID-19 and the opiate crisis and in 2021 we have not received any further communication about next steps. As a College we continue make decisions through the lens of amalgamation, prioritizing those things that need to be completed prior to amalgamation.