



## Restricted Activities for Naturopathic Doctors: Limits and Conditions

This document contains information regarding Naturopathic Doctors' (NDs) scope of practice as set out in the Naturopathic Physicians Regulation (Regulation) under the *Health Professions Act*.

Additional scope of practice information is included in the College of Naturopathic Physicians (CNPBC) Bylaws and Standards of Practice.

The purpose of this document is to identify the **CNPBC Limits and Conditions** assigned to the Restricted Activities granted to NDs in the Regulation.

- 'Restricted Activities' are higher risk clinical activities that must not be performed by any person in the course of providing health services, except members of a regulated profession that has been granted specific legislative authority to do so, based on their education and competencies.
- 'Limits' identify what NDs are not permitted to do.
- 'Conditions' identify the circumstances under which NDs may carry out an activity.

### Revision Log

Revision Date	Revisions Made
April 13, 2022	Published by CNPBC
November 7, 2022	5(1)(d) - Revision of limits to include areas prohibited for injectable fillers
January 19, 2023	5 (1)(d) - Revised Limits and conditions for Injectable Fillers 5 (1)(e) - Added links to PHSA competencies and decision support tools 5 (1)(i) - New Limits and Conditions for the use of IM/IV iron
January 24, 2023	5 (1)(i) – Revision of limits and condition to IV therapy to include certification in Prescriptive Authority and current NALS
April 20, 2023	5 (1)(d) – New limits and conditions on the use of “threads” 5 (1) (h) – Removed limits and conditions on writing orders. 6 (1) – New limits and conditions for the prescription, insertion and removal of Etonogestrel Extended Release Sub-dermal Implants.
June 1, 2023	5 (1) (e) – Correction of the restricted activity to align with the Naturopathic Physicians Regulation.
June 8, 2023	5 (1) (i) – Addition of the limit and condition regarding administering immunizations to those under five (5) years of age and link to BCCDC Immunization Manual
June 12, 2023	5 (1) (b) – Addition of the limit to specify inclusion of phlebotomy into naturopathic scope

September 12, 2023 (Revisions effective October 1 <sup>st</sup> , 2023)	5 (1)(d) – New Limits and Conditions with respect to the use of Plasma Gel or Platelet Rich Plasma (PRF) 5 (1)(i) – New Limits and Conditions with respect to the use of peripherally inserted central catheters (PICCs) and Ports. 5 (1) (k) – Limits and conditions amended to include “prescriptive authority and additional education”. 5 (1) (l) - Limits and conditions amended to include “prescriptive authority and additional education”.
October 3 <sup>rd</sup> , 2023 (Revisions effective January 1 <sup>st</sup> , 2024)	5 (1) (d) – Updated limits and conditions regarding Facial Mesotherapy, Fat Reduction and Body Contouring. 5 (1) (g) – New limits and conditions with respect to the use of LASER.

5 (1) A registrant in the course of practising naturopathic medicine may do any of the following:

5 (1) (a) use naturopathic techniques to make a diagnosis identifying, as the cause of signs or symptoms of an individual, a disease, disorder or condition;

5 (1) (b) perform a procedure on tissue

- (i) below the dermis, or
- (ii) below the surface of a mucous membrane;

### **CNPBC Limits and Conditions**

1. Registrants must hold CNPBC certification in **Acupuncture** prior to engaging in acupuncture.

2. Registrants perform phlebotomy

- 1. To collect blood samples for testing
- 2. As required for purposes of CNPBC Certification

5 (1) (c) move a joint of the spine beyond the limits the body can voluntarily achieve but within the anatomical range of motion using a high velocity, low amplitude thrust;

### **CNPBC Limits and Conditions**

Registrants that practice Spinal Manipulation Therapy (SMT) must attend continuing education in SMT.

5 (1) (d) administer a substance

- (i) by injection,
- (ii) by inhalation,
- (iii) by irrigation,
- (iv) by enteral instillation or parenteral instillation, or
- (v) using a hyperbaric chamber.

### **CNPBC Limits and Conditions**

1. Registrants must have additional education<sup>1</sup> in **Facial Mesotherapy, Fat Reduction and Body Contouring** and current qualification in Naturopathic Advanced Life Support (NALS) prior to providing Facial Mesotherapy, Fat Reduction and Body Contouring.
2. Registrants must hold CNPBC certification in **Cosmetic Botulinum Toxin and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to providing cosmetic botulinum toxin.
3. Registrants must hold CNPBC certification in **Botulinum Toxin: Medical/non-Aesthetic and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to injecting botulinum toxin for the following: Temporomandibular Joint (TMJ) Syndrome; headaches and migraines; and hyperhidrosis.

*This activity cannot be delegated to another person.*

*Registrants must only use botulinum toxin substances that are approved by Health Canada and are included in the pharmacopeia of naturopathic physicians with Prescriptive Authority.*

4. Registrants must hold CNPBC certification in **Injectable Fillers and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to providing injectable fillers.

*Registrants must hold Provisional 1 Injectable Fillers certification or higher to utilize Hyaluronic Acid injectable fillers in the lips, cheeks, chin, marionettes, nasal folds (with cannula only) and jawline.*

*Registrants must hold Provisional 2 Injectable filler certification or higher to utilize any Health Canada approved injectable fillers (Hyaluronic acid, Biostimulators, and threads) into the glabella, forehead, nose (bridge, tip and nasolabial junction), pyriform, nasal folds (with needle), tear troughs, eyelids, temples and body.*

*Registrants must hold Injectable Fillers Provisional Level 2 or Level 2 with additional education<sup>1</sup> in threads prior to utilizing threads.*

*Injecting dermal fillers into the genitalia is prohibited.*

5. Registrants must hold CNPBC certification in **Platelet Rich Plasma (PRP) and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to injecting PRP below the dermis of the face, neck, scalp, and hands.

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<sup>1</sup> "Additional education" is structured education, e.g., workshop, course, program of study, designed so that registrants can attain the competencies required to carry out a specific activity as part of naturopathic practice. Additional education builds on the entry-level competencies of naturopathic doctors; identifies the competencies expected of learners on completion of the education; includes both theory and application to practice, and includes an objective, external evaluation of learners' competencies on completion of the education. The term does not refer to a course or program approved for a CNPBC certification.

*Registrants must hold CNPBC certification in PRP for Aesthetics purposes, Injectable Filler and Prescriptive Authority and current qualifications in Naturopathic Advanced Life Support (NALS) prior to administering Plasma Gel/Platelet Rich Fibrin treatments. Registrants are subject to the restriction in treatment areas determined by their Injectable Filler certification level.*

6. *Registrants must hold CNPBC certification in **Hyperbaric Oxygen (HBO) and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to practising HBO.*
7. *Registrants must hold CNPBC certification in **Ozone and Oxidative Therapies and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to engaging in ozone and oxidative therapies.*

*Depending on the approach to therapy, **IV Therapy Certification, IV and Chelation Therapies Certification or Advanced Injection Therapies Certification** may be required.*

8. *Registrants must hold CNPBC certification in **Advanced Injection Therapies and Prescriptive Authority** and current qualification in Naturopathic Advanced Life Support (NALS) prior to engaging in advanced injection therapies.*

*Stromal Vascular Fraction injections, bone marrow injections, and related injections are prohibited.*

*Stellate ganglion blocks are prohibited.*

*Intra-vaginal injections and intra-cavernous injections are prohibited.*

*Devices used for advanced injection therapy must have an **Active Medical Device** licence from Health Canada (search Health Canada's Medical Devices Active Licence Listing by "Device name").*

5 (1) (e) put an instrument or a device or finger:

- (i) into the external ear canal, up to the eardrum
- (ii) beyond the point in the nasal passages where they normally narrow
- (iii) beyond the opening of the urethra
- (iv) beyond the labia majora,
- (v) beyond the anal verge, or
- (vi) into an artificial opening into the body.

### **CNPBC Limits and Conditions**

1. *Registrants must hold certification in **Intrauterine Device (IUD) Insertion and Prescriptive Authority** prior to inserting an IUD.*

2. *Registrants who carry out pelvic exams or cervical cancer screening must possess the [competencies established by the Provincial Health Services Authority \(PHSA\)](#) and follow [decision support tools established by PHSA](#).*

5 (1) (f) put into the external ear canal, up to the eardrum, a substance that is under pressure.

5 (1) (g) apply:

- (i) ultrasound for diagnostic or imaging purposes, including any application of ultrasound to a fetus,
- (ii) electricity for the purposes of destroying tissue in the course of minor surgery, or defibrillation in the course of emergency cardiac care, or
- (iii) X-rays for diagnostic or imaging purposes, excluding X-rays for the purpose of computerized axial tomography;

### ***CNPBC Limits and Conditions***

1. *Registrants must ensure that all laser devices used are approved by Health Canada*
2. *Registrants obtain additional training prior to utilizing laser*
3. *Registrants must not delegate the use of lasers*
4. *Registrants **do not** use laser for the purpose of cutting and destroying tissue which includes but is not limited to:*
  - a. *lasers used for the treatment of cancer including tumor removal, such as carbon dioxide lasers, Nd:YAG (Neodymium: Yttrium-Aluminum-Garnet) lasers;*
  - b. *lasers used to remove polyps such as Argon lasers;*
  - c. *lasers used for photodynamic therapy (PDT);*
  - d. *lasers used for laser-induced interstitial thermotherapy;*
  - e. *lasers used for the removal of warts; and*
  - f. *lasers used for the treatment of periodontal disease.*
5. *Registrants who utilize Class 3B or Class 4 LASERS must ensure compliance with existing standards and occupational health and safety regulations including:*
  - a. *CSA Z386 Safe Use of Lasers in Health Care;*
  - b. *ANSI Z136.3 Safe Use of Lasers in Health Care; and*
  - c. *WorkSafeBC Occupational Health and Safety (OHS) Regulation – Part 7 Division 3 Radiation Exposure.*
6. *All individuals working in a laser-controlled area are responsible for maintaining safe practices. All settings in which lasers are used must have an identified person (for example, naturopathic physician) who assumes overall responsibility for the safe use of lasers and compliance with laser hazard controls. This individual has the responsibility for ensuring that:*
  - a. *Administrative control measures must be in place to support the safe use of lasers, including the appointment of an appropriately qualified laser safety officer (LSO) in all*

- settings were class 3B and/or class 4 lasers are used. The minimum training requirements for the LSO are specified in CSA Z386 Safe Use of Lasers in Health Care.*
- b. All personnel possess the appropriate level of laser education and training based upon their role (e.g. laser user, laser operator, observer) in the laser-controlled area – as set out in the CSA Z386, Annex E.*
  - c. A comprehensive laser safety program is in place (see section 6.3.1 of the CSA Z386 Safe Use of Lasers in Health Care).*
  - d. A hazard analysis and risk assessment has been completed for each laser system, including when there is a new laser, when laser equipment is replaced, and in the event of a laser safety incident.*
  - e. Procedural, environmental, and engineering control measures have been taken based on relative hazards to ensure the safe use of lasers; this includes the responsibility of ensuring a laser safety program is established and maintained in accordance with current standards.*
  - f. There is a mechanism in place for evaluating the effectiveness of and compliance with the laser safety program.*
7. *All registrants providing laser therapy must ensure that:*
- a. Laser equipment is set up and routinely monitored for safe operation.*
  - b. The area in which the laser is used provides a safe environment to address beam hazards (e.g., tissue interaction, skin damage, eye damage, fire) and non-beam hazards (e.g., electrical, gases/dyes).*
  - c. They possess the appropriate level of laser safety training and are competent in the safe use of the laser system being used for patient care and/or treatment. Laser safety education must be current and updated at a minimum every 2 years (see Annex E of the CSA Z386 Safe Use of Lasers in Health Care).*
  - d. Appropriate eye protection and personal protective equipment (PPE) is used to eliminate, or control hazards associated with the laser system being used.*
  - e. Prior to any laser procedure, they will obtain informed consent from the patient as per the [Practice Standard: Informed Consent](#).*
  - f. Appropriate documentation is done in the patient’s medical record, which includes accurate account of the patient’s status, the laser system parameters and settings, the actions of the laser team and the patient’s outcome.*
- 5 (1) (h) issue an instruction or authorization for another person to perform, in respect of a named individual, a restricted activity specified in paragraph (g) (i) or (iii);

### **CNPBC Limits and Conditions**

*Delegating restricted activities is prohibited.*

5 (1). (i) in respect of a drug:

- (i) prescribe the drug,
- (ii) compound the drug,

- (iii) dispense the drug, or
- (iv) administer the drug by any method;

### **CNPBC Limits and Conditions**

1. Registrants must hold certification in **Prescriptive Authority**, have access to *Pharmanet*, and current qualification in *Naturopathic Advanced Life Support (NALS)* prior to prescribing, compounding, dispensing, or administering a drug.
2. Registrants must hold certification in **Immunization and Prescriptive Authority** prior to prescribing or administering vaccines. Registrants must follow decision support tools established by the [BC Centre for Disease Control](#) when administering vaccines.

*Naturopathic physicians only compound, dispense, or administer immunoprophylactic agents identified by the BC Centre for Disease Control (BCCDC).*

*Registrants must not administer an immunization to a child under five (5) years old*

3. Registrants must hold certification in **IV Therapy and Prescriptive Authority** and current qualification in *Naturopathic Advanced Life Support (NALS)* prior to engaging in IV therapy.

*Registrants must hold certification in **IV Therapy and Chelation Therapies** prior to engaging in chelation therapy.*

*Registrants must obtain additional education<sup>2</sup> in intravenous (IV) and intramuscular (IM) iron prior to administration of IV and IM iron.*

*Registrants must have additional education<sup>2</sup> in peripherally inserted central catheters (PICCs) and ports prior to accessing existing PICCs and ports. Registrants do not insert PICCs or ports.*

5 (1) (j) if nutrition is administered by enteral instillation or parenteral instillation

- (i) select ingredients for a therapeutic diet,
- (ii) compound a therapeutic diet, or
- (iii) dispense a therapeutic diet

5 (1) (k) conduct challenge testing for allergies

- (i) that involves injection, scratch tests or inhalation, if the individual being tested has not had a previous anaphylactic reaction, or

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<sup>2</sup> "Additional education" is structured education, e.g., workshop, course, program of study, designed so that registrants can attain the competencies required to carry out a specific activity as part of naturopathic practice. Additional education builds on the entry-level competencies of naturopathic doctors; identifies the competencies expected of learners on completion of the education; includes both theory and application to practice, and includes an objective, external evaluation of learners' competencies on completion of the education. The term does not refer to a course or program approved for a CNPBC certification.

- (ii) by any method if the individual being tested has had a previous anaphylactic reaction

***CNPBC Limits and Conditions***

*Registrants must have current CNPBC certification in Prescriptive Authority, additional education<sup>2</sup>, current qualifications in Naturopathic Advanced Life Support (NALS) and emergency equipment in place including epinephrine.*

5 (1) (l) conduct desensitizing treatment for allergies

- (i) that involves injection, scratch tests or inhalation, if the individual being tested has not had a previous anaphylactic reaction, or
- (ii) by any method if the individual being tested has had a previous anaphylactic reaction.

***CNPBC Limits and Conditions***

*Registrants must have current CNPBC certification in Prescriptive Authority, additional education<sup>2</sup>, current qualifications in Naturopathic Advanced Life Support (NALS) and emergency equipment in place including epinephrine.*

6 (1) A registrant may perform only surgery that is minor surgery.

**"minor surgery"** means a surgical procedure that

- (a) is performed, for a diagnostic or therapeutic purpose, on a superficial anatomical structure, and
- (b) does not involve:
  - (i) sedation, general anaesthesia or respiratory assistance, or
  - (ii) a material risk to life.

***CNPBC Limits and Conditions***

*Must have successfully completed the [Etonogestrel Extended Release Subdermal Implant Clinical Training Program](#), hold certification in Prescriptive Authority and current qualification in Naturopathic Advanced Life Support (NALS) prior to prescribing, inserting and/or removing the etonogestrel extended release subdermal implant.*

*Registrants prescribing Etonogestrel Extended Release Subdermal Implants must be available to insert them.*