

Practice Standard

Orders, Delegation and Assignment

Practice Standards are legally enforceable standards which set out requirements related to specific aspects of naturopathic doctors' practices. Practice standards are provided for under s.19 of the Health Professions Act. They link with other standards, policies, and bylaws of the College of Naturopathic Physicians of BC, and all legislation relevant to the practice of naturopathic medicine.

Introduction

This standard sets out the requirements for registrants with respect to writing patient-specific orders for regulated health professionals, assignment to unregulated health professionals and accepting orders or delegations from other health professionals.

This standard clarifies that registrants:

- may write patient-specific orders for regulated health professionals, following the requirements in this Practice Standard,
- may assign tasks to unregulated professionals, following the requirements in this Practice Standard,
- cannot delegate restricted activities,
- cannot accept orders or delegation from other health professionals.

Definitions

Assignment: transferring tasks to unregulated persons (e.g. front desk staff) where the required care falls within the employer's established policies and role description. Assignment is not patient specific, and it does not include restricted activities.

Delegation: a process by which a health care professional who has legislative authority to perform a restricted activity transfers that authority to an **unauthorized person**. **Delegation is not permitted.**

Order: a patient specific instruction or authorization, issued by a registrant, for a **regulated health professional** to perform an activity (restricted and non-restricted activities), that the

health care professional has the legislative authority and competencies to perform. A consultation, referral or professional recommendation is not an order.

Restricted Activities: higher risk clinical activities that must only be performed by members of a regulated profession that has been granted specific legislative authority to carry out that restricted activity.

Unregulated persons: individuals who are neither registered nor licensed by a regulatory body and who have no legally defined scope of practice.

Standards

1. Registrants **must not delegate** at any time or in any circumstances.
2. Registrants may assign certain tasks to unregulated persons, but restricted activities cannot be assigned. Assignments must be outlined in the job description of the unregulated person and fall within the assignee's individual competencies.
 - a. The employer is responsible and accountable for developing role descriptions that clearly outline the tasks that can be assigned to an unregulated care provider.
 - b. The unregulated care provider's supervisor is responsible and accountable for providing ongoing supervision to assess the unregulated care provider's ability to perform tasks within the role description.
 - c. Registrants always remain responsible for their patients' care; despite that they may assign certain tasks to unregulated persons.
3. To write an order, registrants:
 - a. must have the authority, knowledge, skill, ability, and judgment to perform the activity
 - b. must hold any certifications required to perform the activity
 - c. must take reasonable steps to ensure the individual receiving the order has the knowledge, skill, ability, and judgement to perform the activity and manage any possible intended and unintended consequences of the activity.
 - d. must communicate any diagnosis, where applicable, to the patient prior to writing the order for treatment
 - e. must obtain consent from the patient, ensuring they follow the requirements set out in the CNPBC [Practice Standard: Informed Consent](#), for the care referred to in their orders.
4. Orders must:
 - a. be patient specific
 - b. be clear and legible
 - c. contain all the information needed for the ordered activity to be carried out safely

- d. be based on a patient naturopathic doctor (ND) interaction wherein the ND makes a recommendation for treatment
 - e. not be amended by the health professional receiving the order
 - f. be documented in the client's permanent record by the registrant giving the order
 - g. include a written/electronic signature.
5. Registrants must only write orders to regulated health professionals that are authorized to perform the activity and have the authority to take orders from NDs.
 6. Registrants are responsible and accountable for their decision to write an order, the person accepting the order is responsible for performance of the activity ordered and documentation of the activity performed in the patient chart, in accordance with their own regulatory standards.
 7. Registrants must ensure that sufficient safeguards and resources are available so that the procedure may be performed safely and ethically.
 8. Registrants must not accept delegation or orders from another registrant or health professional. Referral for continuation of care by another registrant or health professional is appropriate.
 9. Registrants must ensure that their insurance plan includes coverage for writing orders and assigning tasks, prior to engaging in this act.

Applying the Standards

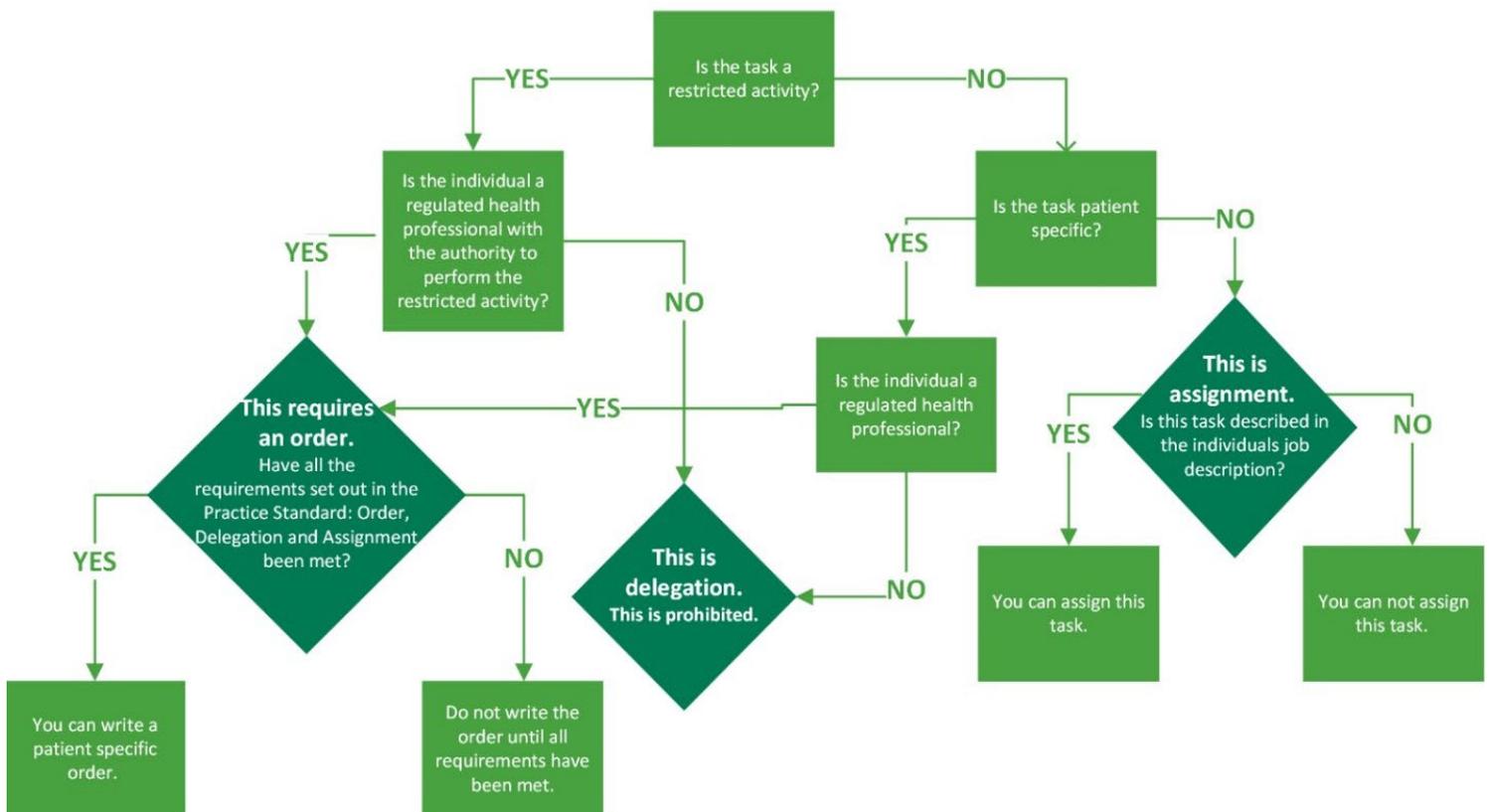
- NDs do not delegate restricted activities to any person, regulated or unregulated, including IV assistants, medical lab assistants or administrative staff.
- NDs can assign an unregulated person to perform non-restricted activities (i.e., apply automated blood pressure cuffs, perform urinalysis, mix tinctures) but it must be included in their role description and training. NDs working in clinics need to do their due diligence to check for developing role descriptions of unregulated staff.
- It is the ND's responsibility to ensure the person they are writing orders to is competent to handle the possible intended and unintended consequences of the treatment. Examples of tasks that would require a patient specific written order are phlebotomy, administration of a substance by IV/IM or an aesthetic injection (ex. Botulinum toxin).
- NDs familiarize themselves with the scope of practice of those regulated professions for which they are writing orders.

- Though the person accepting the order is responsible for their actions, the ND is still ultimately accountable and responsible for their decision to write the order.
- NDs are not permitted to take orders or delegation from any other health professional, including another ND. If an ND is administering a treatment recommended by another health professional, the ND ensures that they are authorized to perform the activity and that they have assessed the patient and met all our their legal, ethical, and professional obligations, prior to administering the therapy. Example:

✗ Dr. Semion Suraj, ND, administers IVs for their colleague, Dr. Theo Lavoie, ND based only on the treatment recommendation written by Dr. Lavoie, ND.

✓ Dr. Suraj, ND, reviews a chart of a patient seen by Dr. Lavoie, ND, assesses the patient and decides continuation of treatment is appropriate based on the patient information. Dr Suraj, ND, obtains informed consent and administers the treatment while meeting all the legal, ethical, and professional obligations.

Understanding Delegation vs. Orders vs. Assignment



References

- [Health Professions Act](#)
- [CNPBC Bylaws](#)
- [Naturopathic Physicians Regulation](#)
- [CNPBC Practice Standard: Informed Consent](#)

Disclaimer

In the event of any inconsistency between this standard and any legislation that governs the practice of naturopathic doctors, the legislation shall govern.

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