

**Scope of Practice for Naturopathic Physicians:  
Standards, Limits and Conditions for Prescribing, Dispensing and  
Compounding Drugs**

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## **Standards, Limits and Conditions Draft Framework**

### **ACKNOWLEDGEMENTS:**

The College of Naturopathic Physicians of British Columbia gratefully acknowledges the College of Registered Nurses of British Columbia (CRNBC) for permission to use material from “Scope of Practice for Nurse Practitioners (Family), Standards, Limits and Conditions”, CRNBC, April 2007; for their pioneering efforts in this area of health regulation and for their generous assistance.

The College also wishes to acknowledge the extensive support and collaboration received from the College of Pharmacists of BC (CPBC). Their support and assistance has been invaluable.

The CNPBC looks forward to ongoing collaboration with these and other health regulatory Colleges in the implementation of prescriptive authority for naturopathic physicians.

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### **CNPBC Standards of Practice**

CNPBC is responsible under the *Health Professions Act* for setting standards of practice for its registrants.

### **Scope of Practice Standards**

Scope of Practice Standards set out standards, limits and conditions related to the scope of practice for naturopathic physicians. (See Appendix A.)

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## **Introduction**

The Government of British Columbia introduced, and approval was granted for revisions to the *Health Professions Act, Naturopathic Physicians' Regulation* (B.C. Reg. 449/99) and the Bylaws of the College of Naturopathic Physicians of British Columbia in 2009, which will enable the implementation of prescriptive authority for naturopathic physicians in BC.

The legal authority for the practice of naturopathic medicine is set out in the *Naturopathic Physicians Regulation*, under the *Health Professions Act*. (See Appendix A.)

Naturopathic physicians must meet requirements for ongoing registration, including meeting continuing competency and quality assurance requirements. These requirements are currently undergoing further development in concert with the current initiative.

This document includes the standards, with limits and conditions, specific to the scope of naturopathic physician practice for prescribing, dispensing and compounding medications.

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## **Section A – Prescribing, Dispensing and Compounding Drugs**

### **PART 1 – STANDARDS**

#### **Prescribing Standards**

##### **STANDARD 1**

Naturopathic physicians prescribe drugs within the limits of the naturopathic physicians' scope of practice and individual competence within that scope of practice.

##### **STANDARD 2**

Naturopathic physicians prescribe from provincial Drug Schedules I, II and III in accordance with the BC *Pharmacy Operations and Drug Scheduling Act* and the federal *Controlled and Drug Substances Act and Regulation* and the College of Naturopathic Physicians of British Columbia (CNPBC) Prescribing Standards, Limits and Conditions.

##### **STANDARD 3**

Naturopathic physicians prescribe medications in accordance with ethical, legal and professional standards of drug therapy.

##### **STANDARD 4**

Naturopathic physicians engage in evidence-based prescribing and consider best practice guidelines and other relevant guidelines when prescribing for clients, including when recommending other therapies.

##### **STANDARD 5**

Naturopathic physicians may write prescriptions for clients (when required for reimbursement by insurance plans or to meet provincial regulations) for nutritional supplementation, appliances and devices and for drugs found in Schedules II and III. (Drugs listed in Schedules II and III do not legally require a prescription).

##### **STANDARD 6**

Naturopathic physicians are solely accountable for their prescribing decisions.

##### **STANDARD 7**

Naturopathic physicians participate in the Canada Vigilance Program through Health Canada.

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## STANDARD 8

Naturopathic physicians meet the following expectations when prescribing drugs:

- Completes prescriptions accurately and completely including the following information (Bylaws to the *Pharmacy Operations and Drug Scheduling Act and Regulations*):
  - date of issue;
  - name and address (if available) of client;
  - name, strength and dosage form of the substance and the quantity prescribed and quantity to be dispensed (**Note:** If the prescriber intends to prohibit generic substitution, it must be done in accordance with section 30 (1) and (3) of the *Pharmacy Act*);
  - directions for use – refers to the frequency or interval or maximum daily dose, route of administration and the duration of drug therapy;
  - directions for number of allowable refills and interval between refills (**Note:** While it is not legally required, if a prescription includes more than one drug, any drug that may be refilled must be clearly identified. If all drugs on a multiple prescription are to be refilled, identify the number of allowable refills for each drug); and
  - prescriber's name, address, telephone number and signature including unique naturopathic physicians' identifier/number.

**Note:** Other elements, not legally required but that might be considered when prescribing include: indicating if a child resistant container is not indicated; indicating the use of the drug; noting client age, date of birth and weight if the client is on either end of the extreme of their weight range; and/or including special instructions, such as “take with food.”

**Note:** A prescription may be telephoned to the pharmacist (unless prohibited by legislation) and must include the prescription information outlined above.

**Note:** A prescription may be transmitted by facsimile (fax) to a pharmacy, provided that the following requirements are met (*Pharmacy Act*):

- the prescription must be sent only to the pharmacy of the client's choice with no intervening person having access to the prescription authorization;
- the prescription must be sent directly from the prescriber's office or directly from a health institution for a patient of that institution, or from another location providing that the pharmacist is confident of the prescription legitimacy;
- the prescription must include all information listed above and in addition must include:
  - time and date of transmission;
  - name and fax number of the pharmacy intended to receive the transmission; and

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- Documents the prescription on the client record.
  - Provides educational information to clients about prescription and non-prescription drugs that includes information regarding:
    - the expected action of the drug and expected duration of therapy;
    - the importance of compliance with prescribed frequency and duration of the drug therapy;
    - potential side-effects;
    - signs and symptoms of potential adverse effects (e.g., allergic reactions) and action to take if they occur;
    - potential interactions between the drug and certain foods, other drugs or substances;
    - specific precautions to take or instructions to follow; and
    - recommended follow up.
  - Monitors and documents the client's response to drug therapy. Based on the client's response, the naturopathic physician may decide to continue, adjust or withdraw the drug, or to consult with a pharmacist, another naturopathic physician or with an MD in accordance with the CNPBC standards for naturopathic physician and MD consultation.
  - When client care is shared with an MD, conjointly determines with the MD processes for access to the client's health record for purposes of treatment decisions and communication.
  - Stores blank prescriptions in a secure area that is not accessible to the public and does not provide any person with a blank, signed prescription.
  - Does not prescribe for them self or become involved in self-care (subject to development of CNPBC policies).
  - If other options are not available, may prescribe for family, friends or peers, provided the client/provider relationship is established and documented (subject to development of CNPBC policies).
  - When receiving information from a pharmaceutical representative, independently verifies the information obtained.



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## Dispensing Standards (Drugs)

### STANDARD 1

Naturopathic physicians dispense medications only in situations in which a pharmacist is not available or accessible, and/or it is in the best interest of the client to do so.\*

### STANDARD 2

Naturopathic physicians acquire, store, dispense and dispose of drugs in accordance with provincial and federal legislation and regulations, and standards and guidelines for best practice. Naturopathic physicians who dispense drugs other than drug samples or small quantities of medications must receive approval from the CNPBC to be designated as a dispensing practitioner (Full). Once approved, a dispensing practitioner must meet standards required of pharmacists (see College of Pharmacists of BC Framework of Professional Practice, see Appendix C) and will be subject to monitoring regarding these standards. Registrants should consider carefully the commitment of time, resources and personal involvement of the registrant that meeting such standards will require before making application for such approval. Such authorization will rarely be granted. Factors such as extreme geographic isolation and lack of alternative sources for required substances will be considered.\*

(\* Notwithstanding Standard 1 and 2 above, naturopathic physicians may continue to dispense botanical and other medicinal preparations which are **not** Scheduled items in accordance with their historical scope of practice, professional training and qualifications, subject to such standards, limits and conditions that may be issued by the College from time to time. There is also a specific protocol for **scheduled** "Historical Use" items found in Standard 3 below.)

### STANDARD 3

A number of substances which were historically used by naturopathic physicians, but which have since become scheduled items (e.g.-digitalis) are listed in Appendix B. Dispensing manufactured naturopathic medicines containing the "historical use" agents in Appendix B is only appropriate when such preparations are not readily available through local pharmacies. Dispensing is only authorized in such situations. All relevant standards for labeling, record keeping and security, as per the College of Pharmacists of BC Framework of Professional Practice (Appendix C) must be met. (Registrants should carefully consider the commitment of time, resources and personal involvement of the registrant that meeting such standards will require before dispensing such items.)

**The list of historically used scheduled items approved for use under this standard, including vitamins, minerals, amino acids and some botanicals, may be found in Appendix B.**

### STANDARD 4

Botanical preparations that contain scheduled agents must be treated as scheduled items. Naturopathic physicians using these botanicals must meet all applicable standards for prescribing, dispensing and/or compounding scheduled substances, notwithstanding that such items may have been used in practice historically by naturopathic physicians. The exception is that botanicals on the "historical use" list in Appendix B may be prepared (compounded; e.g.-tinctures) and dispensed by the naturopathic physician, so long as the preparation contains the appropriate strength, dosage and duration for safe individual use and all labeling and charting requirements are met.

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## STANDARD 5

Naturopathic physicians meet the following expectations when dispensing drug samples, including samples of historical use substances, or small quantities of medication to their clients (see College of Pharmacists guidelines for further details).

- The prescription label (or envelope) indicates (*Pharmacy Operations and Drug Scheduling Act and Regulations*):
  - client's name;
  - drug name, strength where appropriate, and dosage;
  - direction for use;
  - quantity dispensed;
  - date dispensed;
  - prescribing number of prescriber; and
  - initials of naturopathic physician distributing the drug and the location from which the drug is dispensed, including name, address and telephone number.

**Note:** Any other information required by good pharmacy practice (not in the *Act*) is affixed, such as: expiry date; when applicable; or appropriate special circumstances/auxiliary labels (e.g., shake well).

- When indicated, the drug is dispensed in a child resistant container.
- The label can be easily read by the client or client's guardian or representative.
- The drug is handed directly to the client or the client's guardian or representative.
- Client education is provided and includes assessment of the client's level of understanding regarding the drug, including but not limited to the:
  - Purpose of the drug;
  - Dosage regime and instructions required to achieve the intended therapeutic response, expected benefits and side-effects, storage requirements; and
  - Written medication information.
- The transaction(s) is accessible and recorded on an individual prescription profile and/or client record each time a drug is dispensed. The profile will include:
  - client name, address, phone number, date of birth, gender and, when available, allergies and idiosyncratic responses and personal health number assigned by the BC Ministry of Health;

- 
- date dispensed;
  - name, strength, dosage of drug and quantity dispensed;
  - duration of therapy;
  - directions to patient; and
  - signature and unique identifier of the naturopathic physician dispensing the drug.

**Standard 6**

Naturopathic physicians who do not meet these standards and other standards that may be issued by the CNPBC regarding dispensing from time to time may be subject to disciplinary action and/or revocation of privileges by the College.

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## Compounding Standards (Drugs)

**Definition:** Per *Naturopathic Physicians Regulation*, 2009:

**"compound"** means

- (a) in respect of a drug, to mix with one or more other ingredients, and
- (b) in respect of a therapeutic diet, to mix two or more ingredients; “

### STANDARD 1

Naturopathic physicians will utilize the services of compounding pharmacies whenever feasible when compounding is required.

### STANDARD 2

Registrants who wish to be compounding practitioners (Full) must meet all standards and principles in Appendix C, Framework of Professional Practice. This category (Full) is not intended for most registrants and will only be granted in exceptional circumstances.

Compounding involving scheduled items presents considerable risk and therefore registrants should only consider becoming compounding practitioners (Full) where there are no acceptable alternatives such as the use of compounding pharmacies. Compounding involving scheduled items for in-office therapeutic use should only be performed by naturopathic physicians who are certified in practices where there are well-established protocols for such use (e.g.- chelation, prolotherapy).

Naturopathic physicians who wish to assume the responsibilities of a compounding naturopathic physician (Full) must apply to the CNPBC in writing regarding their rationale and specific needs for requiring compounding in their practice and providing assurances that they will meet all College of Pharmacists of BC compounding standards. Such authorization (Full) will rarely be granted.

### STANDARD 3

Naturopathic physicians are permitted to compound **“Historical use” items noted in Appendix B** for authorized in-office procedures (e.g.- chelation- adding vitamins to chelation IV bag. See certification reference under Standard 4 below.). Please note that, due to the definitions above, even adding water to a scheduled item constitutes compounding. This limited “historical use” authorization to “compound” is for **in-office procedures only**. Medicines for patients' use outside the clinic that require the compounding of scheduled items must generally be obtained via a prescription filled by a pharmacy. (Exceptions may be found under Standard 5 below.)

### STANDARD 4

Naturopathic physicians who are required to use more than one scheduled substance simultaneously (i.e.- compounding) in order to meet the requirements of an established treatment protocol (e.g.- chelation, prolotherapy, ozone therapy) are authorized to do so for in-office procedures only. See Appendix D for further details. See “Certification Requirements” on the College’s website at the following link:

<https://cnpbc.bc.ca/for-registrants/resources/certification-requirements/><sup>1</sup>

### STANDARD 5

Compounded substances may not be sold to patients for out of office use unless there is no viable compounding pharmacy alternative **AND** the naturopathic physician has been approved as a Dispensing

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<sup>1</sup> (Link updated March 8, 2016)

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Practitioner (full) by CNPBC and the registrant meets all NAPRA and CPBC standards and principles for compounding. Further, any such transaction must follow CNPBC pricing guidelines in this regard. A maximum charge of 15 % above cost to cover overhead for scheduled items is approved, to reduce the possibility of any conflict of interest or the perception of a conflict. Exception:

An exception for “historical use” items in Appendix B is noted here. Compounded medicines involving “historical use” scheduled items and unscheduled substances are authorized for dispensing, so long as such items are not readily available through local pharmacies. See (Appendix B) and Dispensing Standard 4 above.

#### **STANDARD 6**

Naturopathic physicians who do not meet these standards and other standards that may be issued by the CNPBC regarding compounding from time to time may be subject to disciplinary action and/or revocation of prescribing, dispensing or compounding privileges.

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## PART II – LIMITS AND CONDITIONS

Naturopathic physicians prescribe drugs approved for sale as outlined in the BC *Pharmacy Operations and Drug Scheduling Act* and the federal *Food and Drugs Act and Regulations*, and in accordance with CNPBC's Standards for Prescribing and Dispensing Drugs.

Naturopathic physicians within certain contexts of practice may require broader prescriptive authority than what is permitted in the limits and conditions. Such groups of naturopathic physicians will apply to the CNPBC multidisciplinary Pharmacopoeia and Diagnostic Referral Committee (the "Committee") to expand their prescribing authority. The Committee will set standards and other requirements, such as educational preparation, that specific groups of prescribers must meet to be approved for expanded authority.

Naturopathic physicians will have authority to request "Special Authority" medications \*\* with the exception of two situations:

- They will not have "Special Authority" privileges for prescribing those drugs that have been designated for physician specialist only; and
- They will not have "Special Authority" privileges for prescribing medications that are excluded for use by naturopathic physicians.

**NOTE: Under the federal *Controlled Drugs Substances Act and Regulations*, naturopathic physicians do not have authority to prescribe narcotics and controlled drugs, including benzodiazepines and other targeted substances.** While this may be reviewed at some time in the future, this is the current legal situation.

Please note that certain classes of drugs are federally controlled and are not available for prescribing by naturopathic physicians in BC. See Appendix E for a link to a complete listing of federally controlled substances.

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## LIMITS AND CONDITIONS

Naturopathic physicians are authorized by the *Naturopathic Physicians Regulation* under the *Health Professions Act* to prescribe Schedule I drugs as specified in the Drug Schedules Regulation 9/98 of the *Pharmacy Operations and Drug Scheduling Act*, except for drugs excluded as per the *Naturopathic Physicians Regulation* and drugs excluded in the CNPBC limits and conditions.

- 1) Drugs to be **excluded** from the scope of practice of naturopathic physicians as per the *Naturopathic Physicians Regulation* are found in Appendix F.
- 2) Additional drugs **excluded** in accordance with the CNPBC limits and conditions are listed below:

### **Antibiotics with narrow therapeutic index**

**Note: No antibiotic may be administered in any parenteral form. <sup>2</sup>**

Amikacin and its salts and derivatives  
Amphotercin B and its salts and derivatives  
Apramycin and its salts  
Aztreonam and its salts  
Bacitracin and its salts and derivatives (for parenteral use only)  
Candididin and its salts and derivatives  
Carbomycin and its salts and derivatives  
Caspofungin and its salts and derivatives  
Cefoperazone and its salts and derivatives  
Cilastatin and its salts  
Colistin and its salt and derivatives  
Dalfopristin and its salts  
Dihydrostreptomycin and its salts and derivatives  
Enrofloxacin  
Gentamicin (excluded for parenteral use only)  
Grepafloxacin and its salts and derivatives  
Hetacillin and its salts and derivatives  
Lefamulin for IV use  
Marbofloxacin and its salts and derivatives  
Mecillinam and its salts and derivatives  
Mezlocillin and its salts and derivatives  
Oxacillin and its salts and derivatives  
Quinupristin and its salts  
Streptomycin and its salts and derivatives  
Tazobactam and its salts and derivatives  
Ticarcillin and its salts and derivatives  
Tobramycin and its salts and derivatives (excluded for parenteral use only)

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<sup>2</sup>No antibiotic may be administered in any parenteral form, with the exception of Ceftriaxone, Clindamycin, and Bicillin are approved for parenteral use by registrants of College, which are approved for parenteral use by registrants of the College for use in Lyme disease treatment.

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Trovafloxacin and its salts and derivatives  
Virginiamycin and its salts and derivatives  
Voriconazole

**Antiretroviral Agents**

Atovaquone (excluded for treatment of HIV or infections resulting from HIV)  
Lenacapavir

**Antiviral agents**

Asunaprevir  
Elbasvir  
Foscarnet sodium  
Ganciclovir and its salts  
Grazoprevir  
Idoxuridine  
Maribavir or its salts  
Methisazone  
Ribavirin  
Valganciclovir and its salts and derivatives

**Botulinum toxin types A & B<sup>1</sup>**

**Antineoplastic Agents**

Amivantamab  
Asciminib or its salts  
Belzutifan  
Brexucabtagene autoleucl  
Capmatinib or its salts  
Ciltacabtagene autoleucl  
Darolutamide  
5-Fluorouracil (excluded for intravenous use only)  
Idcabtagene vicleucl  
Lutetium vipivotide tetraxetan  
Mogamulizumab  
Selinexor or its salts  
Selpercatinib or its salts  
Selumetinib or its salts  
Tebentafusp  
Tepotinib or its salts  
Vindesine and its salts  
Zanubrutinib or its salts  
Note: Periwinkle alkaloids in naturopathic preparations are allowed but shall not be used as  
chemotherapeutic agents

**Anticonvulsants**

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<sup>1</sup> This exclusion does not apply to those registrants who have obtained and maintain College certification in *Botulinum toxin: medical/non-aesthetic* or College certification in *Aesthetic Procedures – Cosmetic Botulinum Toxin*; those registrants with *Aesthetic Procedures – Cosmetic Botulinum Toxin* can prescribe and administer botulinum toxin for cosmetic purposes only. (Note added March 8, 2016, and revised August 30, 2018)



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Brivaracetam  
Ethotoin and its salts  
Ezogabine  
Fosphenytoin and its salts  
Methoin (mephenytoin) and its salts  
Perampanel  
Phenacemide  
Rufinamide  
Stiripentol  
Trimethadione  
Vigabatrin and its salts and derivatives

The following agents are only allowed for the management of pain:

Gabapentin and its salts and derivatives  
Pregabalin

### **Disease Modifying Agents**

Eculizumab  
Tralokinumab  
Bartcinib

The following agents are allowed for continuation therapy only:

Azathioprine  
Methotrexate

The following agent is allowed for chelation therapy purposes only:

Penicillamine

### **Drugs Administered Intravenously**

Micafungin

### **Agents Primarily Or Exclusively Used By Medical Specialists**

Avacopan or its salts  
Belumosudil or its salts  
Berotralstat or its salts  
Cangrelor or its salts or derivatives  
Deucravacitinib or its salts  
Difelikefalin or its salts  
Faricimab  
Finerenone or its salts  
Lumasiran or its salts  
Mavacamten or its salts  
Pegcetacoplan  
Pegvaliase  
Risdiplam or its salts or derivatives  
Sotrovimab  
Ursodiolcoltaurine or its salts

### **Emergency Medicine Agents**

Amrinone and its salts

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Anti-inhibitor coagulant complex  
Bosentan and its salts and derivatives  
Digoxin immune Fab (ovine)  
Dobutamine and its salts  
Drotrecogin  
Fomepizole and its salts  
Gadopentetate dimeglumine  
Hetastarch and its derivatives  
Milrinone and its salts  
Physostigmine salicylate (except preparations for oral or topical use only)  
Sodium nitroprusside and its salts

### **Endocrine Agents / Endocrine Diagnostic Agents**

Etonogestrel

- except for registrants certified in Prescriptive Authority who have successfully completed the *Etonogestrel Extended Release Subdermal Implant Clinician Training Program*, and are available to insert the implant

Mepacrine and its salts

Methoxy Polyethelene glycol-epoetin beta

Metryapone and its salts

Pegvisomant

Protirelin TRH analog

Quinagolide and its salts

Sermorelin and its salts

Terlipressin and its salts

Triiodothyropropionic acid

Trilostane

### **Certain agents used for 'Emergency Purposes Only'**

The following agents are authorized only for in-office emergency use. All other indications for these agents are not allowed:

Adenosine

Dopamine

Procainamide

### **Agents dealing with Acute Perinatal Care**

Beractant

Colfosceril and its derivatives

Nitric oxide

Poractant alfa

### **Obstetrical Agents Out-Patient Setting**

Mifepristone

- except for NDs who have completed one of the following courses:
  - a. Medical Abortion Training Program- Society of Obstetricians and Gynaecologists of Canada (SOGC)
  - b. Medical Abortion Virtual Course – National Abortion Federation of Canada

Ritodrine and its salts

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### **Ophthalmic Agents**

Agents used for the treatment of iritis or glaucoma agents:

Brimonidine and its salts  
Carbachol  
Cypentolate and its salts (parenteral use only)  
Dipivefrin  
Dorzolamide  
Ecothiophate  
Fluocinolone acetonide  
Homatropine and its salts (ophthalmic use or >2mg oral)  
Latanoprost  
Latanoprostene Bunod or its salts or derivatives  
Levobunolol  
Methazolamide  
Nepafenac  
Pilocarpine  
Timolol (excluded for ophthalmic use only)  
Unoprostone

Topical corticosteroids:

Dexamethasone (excluded for ophthalmic use only)  
Prednisolone (excluded for ophthalmic use only)

Miscellaneous ophthalmic preparations:

Pegaptanib  
Trifluridine  
Verteporfin

The following agents are allowed for the treatment of hypotrichosis of the eyelid only:

Bimatoprost to the maximum strength of 0.03% w/v.  
Bimatoprost otherwise remains excluded for the treatment of intraocular pressure.

### **Antiparkinsonism Agents**

Apomorphine  
Biperiden and its salts  
Safinamide or its salts  
Tolcapone

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### **Antipsychotic Agents**

Acepromazine and its salts  
Butaperazine and its salts  
Cariprazine or its salts  
Chlorprothixene and its salts  
Mesoridazine and its salts  
Pericyazine and its salts  
Pipotiazine and its salts  
Promazine and its salts  
Remoxipride and its salts  
Thiethylperazine and its salts  
Thioridazine and its salts  
Thiothixene and its salts  
Triflupromazine and its salts  
Trimeprazine and its salts

### **Antiarrhythmic agents**

Bretylium tosylate  
Disopyramide and its salts  
Esmolol and its salts  
Flecainide and its salts  
Ibutilide and its salts and derivatives  
Isoproterenol (isoprenaline) and its salts  
Methoxamine and its salts  
Mexiletine and its salts  
Procainamide and its salts  
Quinidine salts  
Sotalol and its salts  
Tocainide and its salts

### **Antifungal agents**

Anidulafungin

### **Antitubercular agents used for other infections**

Isoniazid

### **Thrombolytic, Hemostatic and Anti-platelet Agents**

Alteplase except when given in a dosage of 4mg or less (Alteplase is approved for use by NDs for a maximum dosage of 4 mg)  
Ambrisentan  
Aminocaproic acid  
Aprotinin  
Argatroban and its salts and derivatives  
Bivalirudin  
Catridecacog  
Danaparoid and its salts and derivatives  
Enoxaparin and its salts

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Eptifibatide and its salts  
Idrucizumab  
Reviparin and its salts  
Romiplostim  
Streptokinase/streptodornase  
Tenecteplase and its salts and derivatives Tirofiban  
and its salts and derivatives

**Vaccines**

Anthrax Vaccine Adsorbed

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**New drugs approved for sale in Canada**

Any drug approved that is in a category in which all drugs in that category are approved for ND prescribing, the new agent shall be automatically approved.

Any drug newly approved by Health Canada that is in a category in which NOT all drugs in that category are approved for ND prescribing, the new agent shall go to the Pharmacopoeia and Diagnostic Referral Committee for review.

Any drug newly approved by Health Canada that is in a category in which all drugs in that category are restricted by regulations or by the Pharmacopoeia and Diagnostic Referral Committee shall be automatically be restricted.

If there is any doubt regarding the status of a new drug approved for sale in Canada, please contact the CNPBC office.

**Diagnostic Testing Standards**

To ensure patient safety, all naturopathic physicians who are authorized to prescribe must have access to and appropriately utilize laboratory and other diagnostic testing in the assessment, treatment and monitoring of patients receiving prescription drugs. Currently, naturopathic physicians in BC must continue to utilize laboratory and other diagnostic testing as available in order to ensure patient safety in accordance with best practices and their professional judgement.

CNPBC will issue further detailed Standards, Limits and Conditions regarding diagnostic testing at such time as such services become widely accessible within BC following consultations with the Ministry of Health Services and the College of Physicians and Surgeons of BC

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## **Section B – Physician Consultation and Referral**

### **PART 1 – STANDARDS**

Consultation and collaboration with other health care providers is an essential component of safe, appropriate and integrated prescribing practices. Naturopathic physicians initiate discussion, collaboration, consultation with and/or refer to other members of the health care team in a timely and appropriate manner.

Consultation, including referral, as used in these Standards, refers to a specific request to or by an medical doctor (“MD”) to become involved in the care of a client with respect to prescribing. The responsibility to consult with or refer to a medical doctor lies with the naturopathic physician and is made in collaboration with the client. A naturopathic physician may also seek consultation with or transfer care to an MD at the request of the client.

Consultation may result in one of the following levels of physician involvement:

- The MD provides an opinion and recommendation to the naturopathic physician who continues to have primary responsibility for the health care of the client;
- The MD assumes concurrent responsibility for some aspects of the care, and the MD and naturopathic physician together clarify who is assuming responsibility for the various aspects of the client’s care, including coordination of the overall care; or
- The care of the client is transferred to the MD who then assumes primary responsibility for the care. The naturopathic physician documents the request for and outcome of the consultation or referral.
- Transfer or sharing of care occurs after discussion and agreement among the client, the referring naturopathic physician and the MD.

### **Standards**

#### **STANDARD 1**

The naturopathic physician consults or refers to an MD when the client’s health condition or needs are such that:

- the diagnosis and plan of treatment is beyond the knowledge, skill and judgment of the naturopathic physician to determine;
- the care that is required is beyond the naturopathic physician’s competencies and scope of practice;
- sign(s), symptom(s) or report(s) or diagnostic or laboratory tests suggest that a client’s condition is destabilizing or deteriorating and is beyond the ability of the naturopathic physician to manage; or
- the anticipated outcomes of therapy are not realized and further treatment is beyond the ability of the naturopathic physician to manage, or the target symptoms are not responding to treatment.

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## **STANDARD 2**

The naturopathic physician communicates and consults with or refers to MD's by:

- clearly presenting the reason for and the level of urgency of the consultation or referral;
- describing the level of MD involvement requested at the time a referral is made;
- determining the availability of the MD to provide the consultation in a timely and appropriate manner;
- ensuring that the MD has appropriate access to the client's relevant health information;
- confirming with the MD, following the consultation, the level of MD involvement; and
- documenting the request for and outcome of the consultation or referral.
- communicating information regarding the discontinuation of medications that were initiated by the MD.

## **STANDARD 3**

The naturopathic physician and the consulting MD conjointly establish methods for communicating about their mutual client's health condition and treatment decisions in situations in which client care is shared.

## **PART II – LIMITS AND CONDITIONS**

Naturopathic physicians can make referrals to family physicians. Due to current limitations that exist in MSP coverage, naturopathic physicians should **not** refer directly to medical specialists. Referrals to family physicians should be made in such circumstances and the family physician can make any required specialist referrals at their discretion.



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## Appendix A

### THE NATUROPATHIC PHYSICIANS REGULATION

The *Naturopathic Physicians Regulation* (the “*Regulation*”) is available online at: [https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/282\\_2008](https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/282_2008)<sup>4</sup> and it sets out, among other things:

- reserved titles for naturopathic physicians;
- a scope of practice statement;
- restricted activities for naturopathic physicians; and
- prescriptive drug exclusions.

### RESERVED TITLES

The *Regulation* states that only registrants of the College of Naturopathic Physicians of British Columbia may use the titles “naturopath”, “naturopathic physician” and “naturopathic doctor”. The *Regulation* also identifies that registrants may use the titles “doctor” and “physician”, the use of which is limited by section 102 of the CNPBC bylaws.

### SCOPE OF PRACTICE

Scope of practice refers to the activities that naturopathic physicians are educated and authorized to perform. These activities are:

- established through the legislated definition of naturopathic medicine and restricted activities; and
- further articulated by Standards, Limits and Conditions set by the CNPBC.

Under the *Regulation*, a registrant of CNPBC may practice naturopathic medicine, which is defined as “the health profession in which a person provides the services of prevention, assessment and treatment of an individual's diseases, disorders and conditions using education and naturopathic techniques, therapies or therapeutics to stimulate or support healing processes and promote, maintain or restore the overall health of the individual.”

### STANDARDS, LIMITS AND CONDITIONS

The *Health Professions Act* and the *Naturopathic Physicians Regulation* give CNPBC authority to establish, monitor and enforce standards, limits and conditions for naturopathic physicians’ practice.

**Standard:** A desired and achievable level of performance against which actual performance can be compared. It provides a benchmark below which performance is unacceptable.

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<sup>4</sup>Link updated April 30, 2021

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**Limits and Conditions:** A limit is the point at which something must end. The Pharmacopoeia and Diagnostic Referral Committee develops and recommends naturopathic physicians' standards, limits and conditions for approval by the CNPBC Board.

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## **Appendix B**

### **Approved “Historical Use” Scheduled Botanicals, Vitamins, Minerals, and Amino Acids**

#### **Botanicals**

Apiol, oil of parsley  
Atropa belladonna  
Colchicum autumnale  
Digitalis lanita and purpurea  
Rauwolfia serpentina  
Veratrum album and viridie

#### **Vitamins**

Folic acid in doses >1mg  
Vitamin A > 10,000iu oral per oral dose  
Vitamin B12 with intrinsic factor  
Vitamin D > 1000iu per dose  
Vitamin K  
Parenteral vitamins

#### **Minerals**

Calcium and its salts for parenteral use  
Chromium and its salts for parenteral use  
Copper and its salts for parenteral use  
Fluoride and its salts  
Lithium and its salts in doses equivalent to  $\leq 150$ mg lithium carbonate  
Magnesium and its salts for parenteral use  
Manganese and its salts for parenteral use  
Potassium and its salts for parenteral use  
Selenium and its salts for parenteral use  
Silver and its salts  
Sodium chloride for parenteral nutrition  
Sodium fluoride  
Iodine and its salts for parenteral use  
Strontium and its salts  
Zinc and its salts for parenteral use

#### **Amino Acids**

Amino acid solutions for parenteral use  
Amino acids sold as single entities  
Pancreatic enzymes

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## **Appendix C**

College of Pharmacists of BC Framework of Professional Practice may be found at:

<https://www.bcpharmacists.org/professional-practice-policies-and-guides>

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## **Appendix D**

### **Use of more than one scheduled item for advanced practices**

Naturopathic physicians who are certified in chelation, prolotherapy, bio-oxidative therapies or other advanced practices are authorized to compound and use more than one scheduled substance if this is required by an established treatment protocol. Examples of such situations follow. Established treatment protocols may involve the use of the following scheduled items:

#### **Chelation**

injectable vitamins/minerals as covered in Appendix B

Trientine

#### **Intravenous Therapy**

injectable vitamins/minerals and amino acids as covered in Appendix B

#### **Prolotherapy**

Authorized Anaesthetics

Dextrose

Sodium Morrhuate

P2G (Phenol, glycerin, dextrose)

Growth Hormone

Hyaluronic Acid Injectable

Glucosamine sulfate injectable

#### **Bio-oxidative therapy**

Heparin

sodium citrate

Other therapeutic protocols may emerge which require the simultaneous use of multiple scheduled items for in office procedures. These will be reviewed by the College for approval.

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## Appendix E

### Classes of Controlled Substances under the *Controlled Drugs and Substances Act* (“CDSA”)

The classes of substances briefly described below are federally controlled under the *CDSA*. They are **not** authorized for prescribing or use by naturopathic physicians in BC.

The expression "controlled substance" means a substance included in Schedule I, II, III, IV or V. For a detailed listing of federally controlled substances and the language of the *CDSA*, check the *CDSA* and related Government of Canada websites, such as: <https://laws-lois.justice.gc.ca/eng/acts/C-38.8/><sup>6</sup>

or alternative websites such as: <https://www.canlii.org/en/ca/laws/stat/sc-1996-c-19/latest/sc-1996-c-19.html>

- **Schedule I:** narcotic drugs such as opium, morphine and cocaine.
- **Schedule II:** cannabis, hashish, cannabinol, etc.
- **Schedule III:** stimulants such as amphetamines, hallucinogenics, such as mescaline, LSD and DET, and sedatives such as methaqualone, commonly called quaalude.
- **Schedule IV:** among others, anabolic steroids (including testosterone), hypnotics such as barbiturates and benzodiazepines.
- **Schedule V:** enumerates other substances that may be abused.
- **Schedule VI:** precursors, which produce no effects on the mind but can be converted or used to produce designer drugs, "simili-drugs" or substances contained in the schedules under Canada's international obligations under the *Single Convention on Narcotic Drugs* (1961) and the *Vienna Convention* of 1988.
- **Schedules VII and VIII:** concerning application of penalties for cannabis offences.

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<sup>6</sup> (Link updated March 8, 2016)

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## **Appendix F**

Drug exclusions per the *Naturopathic Physicians Regulation* may be found on the Ministry of Health website at: <https://www2.gov.bc.ca/gov/content/health/practitioner-professional-resources/professional-regulation/naturopathic-medicine> (Link updated March 8, 2016)

### **Schedule**

[en. B.C. Reg. 156/2009, s. 4.]

#### **Excluded Schedule I Drugs**

Acetohexamide	Butalbital
Adalimumab	Butorphanol
Adefovir	Cabergoline and its salts
Agalsidase alfa	Capecitabine and its salts and derivatives
Aldesleukin	Carboplatin
Alemtuzumab	Carmustine
Alfentanil	Cetrorelix and its salts
Alkyl nitrites	Cetuximab
Alprazolam	Chlorambucil and its salts and derivatives
Altretamine	Chlordiazepoxide and its salts
Amifostine and its salts	Chlorisondamine and its salts
Aminoglutethimide	Choriogonadotropin alfa
Aminopterin and its salts	Cinacalcet and its salts
Aminopyrine and its derivatives	Cisplatin
Amprenavir and its salts and derivatives	Cladribine and its salts
Amsacrine and its salts	Clobazam and its salts
Anagrelide and its salts	Clonazepam and its salts
Anakinra and its salts and derivatives	Clorazepic acid and its salts
Anastrozole	Codeine when prescribed as a single entity or when included in a preparation containing more than 8 mg per dosage unit
Ancestim	Cyclophosphamide
Anileridine	Cycloserine
Anti-thymocyte globulin	Cyclosporine
Atazanavir and its salts	Cytarabine and its salts
Atracurium besilate	Dacarbazine
Auranofin	Daclizumab
Aurothioglucose	Dactinomycin
Basiliximab	Daunorubicin and its salts
Bevacizumab	Delavirdine and its salts
Bicalutamide	Desflurane
Bleomycin	Dexrazoxane and its salts
Bortezomib	
Bromazepam and its salts	
Buprenorphine	
Buserelin and its salts	
Busulfan	

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Diazepam and its salts	Hydrocodone (dihydrocodeinone)
Didanosine and its salts and derivatives	Hydromorphone (dihydromorphone)
Diethylstilbestrol and its derivatives	Hydroxychloroquine and its salts
Dihydrotestosterone	Idarubicin and its salts
Dinoprostone and its salts and derivatives	Ifosfamide
Docetaxel and its derivatives	Imatinib and its salts
Doxacurium chloride	Imiglucerase
Doxercalciferol and its derivatives	Indinavir and its salts
Doxorubicin and its salts	Infliximab
Droperidol and its salts	Interferon
Edrophonium chloride	Iproniazid and its salts
Efavirenz	Irinotecan and its salts
Emtricitabine	Isoflurane
Enflurane	Ivermectin and its derivatives
Enfuvirtide	Kanamycin and its salts and derivatives
Epirubicin and its salts	Ketamine and its salts
Erythropoietin	Ketazolam and its salts
Estazolam and its salts	Lamivudine and its salts
Estramustine and its salts	Laronidase
Etanercept	L-Asparaginase
Ethambutol and its salts	Leflunomide and its salts
Ethchlorvynol	Letrozole
Ethionamide and its salts	Leuprolide and its salts
Ethoheptazine and its salts	Levallorphan and its salts
Etoposide and its derivatives	Levamisole and its salts
Exemestane	Levorphanol
Fenfluramine and its salts	Lincomycin and its salts and derivatives
Fentanyl	Linezolid and its salts
Filgrastim	Lomefloxacin and its salts
Flucytosine	Lomustine
Fludarabine and its salts and derivatives	Lopinavir
Flumazenil	Loracarbef and its salts and derivatives
Fluorouracil and its derivatives for parenteral use only	Lorazepam and its salts
Flurazepam and its salts	Mazindol and its salts
Flutamide	Mecamylamine and its salts
Follicle stimulating hormone	Mechlorethamine and its salts
Formestane and its salts and derivatives	Melanoma therapeutic vaccine
Fulvestrant	Melphalan
Gallamine triethiodide	Menotropins (human)
Ganirelix and its salts and derivatives	Meperidine (pethidine)
Gefitinib	Mercaptopurine
Gemcitabine and its salts	Meropenem and its salts and derivatives
Glatiramer and its salts	Mesna
Gold and its salts	Metaraminol bitartrate
Goserelin and its salts	Methadone
Halazepam and its salt	Methaqualone
Halofantrine and its salts	Midazolam and its salts
Halothane	Midodrine and its salts
	Miglustat
	Mitomycin and its salts



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Mitotane (o,p'-DDD)  
Mitoxantrone and its salts  
Mivacurium chloride  
Molgramostim  
more than 8 mg per dosage unit  
Morphine  
Muromonab-CD3  
Mycophenolic acid and its salts and derivatives  
Nalmefene and its salts  
Nelfinavir and its salts  
Neostigmine salts  
Netilmicin and its salts and derivatives  
Nevirapine and its salts  
Nikethamide  
Nilutamide  
Nitrazepam and its salts  
Normethadone  
Octreotide  
Oxazepam and its salts  
Oxycodone  
Paclitaxel and its derivatives  
Palivizumab  
Pamidronic acid and its salts  
Pancuronium and its salts  
Pegfilgrastim  
Pemetrexed and its salts  
Pentamidine and its salts  
Pentazocine  
Pentolinium tartrate  
Pentostatin and its salts  
Perflutren  
Phentolamine and its salts  
Pipobroman  
Porfimer and its salts  
Pralidoxime and its salts  
Prazepam and its salts  
Prodilidine and its salts  
Propofol  
Propoxyphene  
Pyrazinamide  
Pyridostigmine bromide  
Raltitrexed and its salts and derivatives  
Rasburicase  
Rifabutin and its salts  
Riluzole and its salts

Ritonavir  
Rituximab  
Rocuronium bromide  
Rofecoxib  
Saquinavir and its salts and derivatives  
Sargramostin  
Sevelamer hydrochloride  
Sirolimus and its derivatives  
Sodium aurothiomalate  
Stavudine  
Streptozocin  
Succinylcholine and its salts  
Sufentanil  
Suxamethonium chloride  
Tacrolimus and its derivatives  
Tegafur and its salts  
Temazepam and its salts  
Temozolomide and its salts  
Teniposide  
Tenofovir and its salts and derivatives  
Thalidomide  
Thiocarlide  
Thioguanine  
Thiotepa  
Tiludronic acid and its salts  
Tipranavir and its salts  
Topotecan and its salts  
Toremifene and its salts  
Trastuzumab  
Treo sulfan  
Treprostinil and its salts  
Tretamine  
Triazolam and its salts  
Trimethaphan camsylate  
Trimetrexate and its salts  
Troglitazone  
Tubocurarine and its salts  
Valrubicin and its derivatives  
Vecuronium bromide  
Viomycin and its salts and derivatives  
Zalcitabine and its salts  
Zidovudine  
Zoledronic acid and its salts and derivatives