

Consultation Questions – Naturopaths

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Background:

The Government of the Northwest Territories (“GNWT”) is considering whether to regulate Naturopaths under the umbrella health and social services professions legislation that is currently being developed by the Department of Health and Social Services.

In order to assist the Department in identifying the issues to be considered, Field LLP, together with representatives of the GNWT Department of Health and Social Services, have prepared a list of topics for discussion and consultation.

The following is a list of questions to be discussed during our upcoming telephone conference. In addition to these particular questions, we welcome additional comments and input you may have as an individual who practices as a Naturopath in the NWT.

Issues for Consultation:

1. Background on Naturopaths in the NWT

- What are some examples of issues and challenges associated with being a Naturopath in the NWT?
- Please describe your practice setting(s)?
- Please describe any issues or challenges you foresee in the growth of the Naturopath profession in the NWT?
- Please describe the services you provide to the public. What services do you anticipate providing to the public in the future? What other services to Naturopaths provide?

2. Registration Requirements

- If Naturopaths were to be regulated in the NWT, what should the requirements (if any) be with respect to:
 - Education
 - Practical experience/supervised practice hours
 - Entrance exam specific to the profession
 - Maintaining registration in another Canadian jurisdiction
 - Good character (reference letters, criminal reference check)

3. *Regulatory Model – Exclusive Scopes of Practice*

- An exclusive scope of practice permits registered professionals to provide a defined scope of services to the public. This model is more exclusive than a “right to title” model (discussed below) because only registered professionals can provide the defined scope of services, but it also involves mandatory registration for professionals seeking to perform the activities or services.
- Since Naturopaths provide services that overlap with services provided by Physicians and others, does this overlapping of roles in the NWT render an exclusive scope of practice model impractical?
- If an exclusive scope of practice model were to be adopted, how should the scope of practice for Naturopaths be defined?
- What are the advantages and disadvantages of a modified exclusive scope of practice whereby certain activities are exclusive to Naturopaths, but others are not? (for example, see the *Pharmacy Act*)
- Under a modified exclusive scope of practice, which services or activities should be performed only by Naturopaths?

4. *Regulatory model – Right to Title*

- An alternative would be legislation that restricts and/or protects professional titles for the exclusive use by registered professionals. Please provide any comments about this possible method of regulating Naturopaths in the NWT?
- What are the advantages and disadvantages associated with protecting titles?
- As a professional, how important is title protection to you?
- Is title protection advantageous in terms of clarifying professional status and ensuring public clarity?
- Is title protection sufficient to protect the public from unsafe practice by unqualified, non-registered individuals?
- Are there people in the NWT providing similar services to those you provide who would not meet the minimum registration requirements discussed above?
- Which titles should a regulation that governs Naturopaths protect?

5. *Continuing competence*

- Should a regulation that governs Naturopaths in the NWT include continuing competence requirements?
- If so, what format should the continuing competence take? Consider the following:
 - Continuing education hours
 - Self-assessment
 - Requirements to be fulfilled annually or less frequently?

6. *Standards of Practice*

- Should a regulation that governs Naturopaths in the NWT address Standards of Practice?
- If so, is there anything particular the Standards of Practice should address?
- Are there model Standards of Practice in use for Naturopaths in other jurisdictions?

7. *Codes of Ethics*

- Should a regulation that governs Naturopaths in the NWT contain a Code of Ethics?
- If so, is there anything particular the Code of Ethics should address?
- Are there model Codes of Ethics in use for Naturopaths in other jurisdictions?

8. *Other Topics for Discussion*

- In addition to the topics set out above, please provide input on any additional issues that, in your view, are relevant to the consideration of whether to regulate Naturopaths in the NWT.