### DISCIPLINE COMMITTEE OF THE COLLEGE OF NATUROPATHS OF ONTARIO

This is Exhibit # 2 In CONO vs. Natasha Turner (DC21-02) Date: May 2, 2022

BETWEEN:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER (FILE NO. 20-021R)

### AGREED STATEMENT OF FACTS AND ADMISSION OF PROFESSIONAL MISCONDUCT

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### DISCIPLINE COMMITTEE OF THE COLLEGE OF NATUROPATHS OF ONTARIO

BETWEEN:

COLLEGE OF NATUROPATHS OF ONTARIO

- and -

NATASHA TURNER (FILE NO. 20-021R)

### AGREED STATEMENT OF FACTS AND ADMISSION OF PROFESSIONAL MISCONDUCT

The parties hereby agree that the following facts and attachments may be accepted as true by the Discipline Committee of the College of Naturopaths of Ontario (the "College"):

#### **The Registrant**

- 1. Dr. Natasha Turner, ND (the "Registrant") registered with the Board of Directors of Drugless Therapy Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the "College") on July 1, 2015. Attached as **Tab** "**A**" is a printout from the College's Naturopathic Doctor Register.
- 2. The Registrant has not successfully completed a course on prescribing approved by Council or an examination on prescribing administered or approved by Council and therefore is not authorized to prescribe drugs or substances.
- 3. At all relevant times, the Registrant worked at and owned Clear Medicine in Toronto, Ontario (the "Clinic").

#### Prescribing and Selling

- 4. It is agreed that between approximately March 1, 2018 and February 24, 2021, the Registrant did the following:
  - a. Recommended, prescribed and sold Vitamin D to her patients in excess of 1,000 International Units ("ID") without authorization.
  - b. Recommended and sold Vitamin D to the public via the Clinic website in excess of

- 1000 IU without authorization. An excerpt of the Clinic website with Clear Vitamin D3 Drops (60 mL) for sale to the general public is attached as **Tab "B"**. The website indicates that the recommended dosage is 2,000 IU per day.
- c. Recommended and sold other treatments or substances via her Clinic website without authorization. An excerpt of the Clinic website with "treatment-specific kits" for sale to the general public is attached as **Tab "C"**.
- 5. It is agreed that prescribing, dispensing, selling or compounding a drug is a controlled act, in accordance with section 27(2) of the *Regulated Health Professions Act, 1991*.
- 6. Registrants are authorized to prescribe dispense, compound or sell a drug designated in the regulations in the course of engaging in the practice of naturopathy subject to the terms, conditions and limitations imposed on his or her certificate of registration, in accordance with section 4(1) of the *Naturopathy Act*, 2007 (the "Act").
- 7. It is agreed that the Registrant failed to comply with section 4 of the Act when she prescribed Vitamin D as indicated in paragraph 4(a) above.
- 8. Vitamin D requires a prescription if it is prescribed in an oral dosage containing more than 1,000 ID per dosage or, where the largest daily dosage would, if consumed by a patient, result in the daily intake by that patient of more than 1,000 IUD of Vitamin D, in accordance with Table 3 of O Reg 168/15: General under the Act (the "General Regulation"). On or about February 24, 2021, the Prescription Drug List established under the *Food and Drugs Act* (Canada) was amended such that Vitamin D under 2500 IU per daily dose no longer required a prescription. As set out in section 2(2) of Ontario Regulation 168/15, where there is a conflict between Regulation 168/15 and a law of Canada, the law of Canada prevails.
- 9. A registrant may only prescribe a drug designated in Table 3 of the General Regulation, including Vitamin D, if all of the standards of practice of the profession set out in section 9 of the General Regulation are met.
- 10. It is agreed that the Registrant failed to comply with section 9 of the General Regulation when she prescribed Vitamin D as indicated in paragraph 4(a) above, which was prior to February 24, 2021.
- 11. A registrant may only sell a Vitamin D in an oral dosage containing more than 1,000 ID per dosage or, where the largest daily dosage would, if consumed by a patient, result in the daily intake by that patient of more than 1,000 ID of Vitamin D if all of the standards of practice of the profession set out in section 12 of the General Regulation are met. On or about February 24, 2021, the Prescription Drug List established under the *Food and Drugs Act* (Canada) was amended such that Vitamin D under 2500 IU per daily dose no longer required a prescription. As set out in section 2(2) of Ontario Regulation 168/15, where there is a conflict between Regulation 168/15 and a law of Canada, the law of Canada prevails.
- 12. It is agreed that the Registrant failed to comply with section 12 of the General Regulation when she sold Vitamin D as indicated in paragraph 4(a) and (b) above, which was prior to February 24, 2021.

- 13. It is further agreed that the Registrant prescribed and sold a drug or a substance for an improper purpose, including but not limited to recommending or selling "treatment-specific kits" on the Clinic website (see Tab "C" above).
- 14. It is agreed that the conduct described in paragraph 4 above was not done within the context of a registrant-patient relationship and was done without conducting an assessment.
- 15. It is further agreed that the conduct described in paragraph 4 is a breach of the College's standards of practice on Core Competencies, Prescribing, Recommending Non-Scheduled Substances and Selling.

#### Recommending Non-Scheduled Substances

- 16. It is agreed that the Registrant offered, sold and recommended non-scheduled products, services and drugs to the public on the Clinic website. An excerpt of the Clinic website with various supplements, including omega and melatonin among other things, for sale to the general public is attached as **Tab "D"**.
- 17. It is further agreed that the conduct described in paragraph 16 above was not done within the context of a registrant-patient relationship and was done without conducting an assessment.
- 18. It is agreed that the conduct described in paragraph 16 above is a breach of the College's standards of practice on Recommending Non-Scheduled Substances.

#### **Advertising**

- 19. It is agreed that the Registrant permitted statements to be posted on her social media and on the Clinic website that amount to a guarantee of success, including but not limited to the following statements:
  - a. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, *The Supercharged Hormone Diet*, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011". A copy of the "About Dr. Turner, ND" page of the Clinic website is attached as **Tab** "E".
  - b. "My own new personal approach and that used with my patients is still based on balancing hormones but is now also based on a philosophy that is simple: when you exercise less, I want to help you to eat less; and when you exercise more, I will help you chose the right foods to eat more. According to the latest research, about 96 percent of people tend to gain weight back—plus more—with the typical approach of cutting calories/exercising more. Clearly, this does not work and only leads to future weight gain, to say nothing of metabolic damage as the stress it causes only furthers a greater drop in thyroid hormones drop and loss of precious metabolically active muscle.

You will never again – eat less and exercise more! [...]" A copy of an article entitled "How to boost your metabolism, gain energy and lose weight" written by the Registrant on August 1, 2018 is attached as **Tab "F".** 

- 20. It is further agreed that the statement at paragraph 19(a) above constitutes a claim respecting a treatment other than a claim that can be supported as a reasonable professional opinion.
- 21. It is agreed that the Registrant permitted the use of testimonials from a patient, former patient or other person in respect of her practice and products on the Clinic website. An excerpt of the Clinic website featuring numerous testimonials is attached as **Tab "G"**.
- 22. It is agreed that the Registrant indicated and implied that she is a specialist in the profession, including but not limited to by publishing the following statements:
  - a. "Dr. Natasha Turner ND a New York Times bestselling author and <u>one of North America's leading naturopathic doctors</u>, a sought-after speaker, <u>natural health expert</u> and the founder of Clear Medicine Wellness Boutique in Toronto. In 2014 she was recognized by her professional organization as <u>a leader in her field</u> and in 2016 was awarded the top spot on a list of North America's Most Innovative Health Experts. [...] Her work has been <u>endorsed by New York Times bestselling authors</u>, Suzanne Somers, Dr. William Davis, and Dr. Christine Northrup, as well as Dr. Mache Seibel faculty member, Harvard Medical School and bestselling author of The Estrogen Window" (see Tab "E").
  - b. A "health expert". A copy of the Registrant's Twitter (handle @drnatasha) is attached as **Tab "H"**.
  - c. An "expert". A copy of the "About" section of the Registrant's Facebook for The Hormone Diet (handle @thehormonediet) is attached as **Tab "I"**.
- 23. It is further agreed that the statement at paragraph 22(a) above constitutes advertising with a comparative or superlative statement. It is agreed that the Registrant also published the following superlative statement on her Clinic website:
  - a. "With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada." An excerpt of the Clinic website for the "Clear Medicine Wellness (The Hormone Diet Bootcamp)" page is attached as **Tab "J"**.
- 24. It is agreed that the Registrant permitted advertising of her practice in a manner that was false or misleading and that included statements that are not factual and verifiable, including but not limited to publishing the following statements:
  - a. "one of North America's leading naturopathic doctors ..." (see Tab "E").
  - b. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, *The Supercharged Hormone Diet*, an accelerated 30 day plan to restore your

- metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011" (see Tab "E").
- c. The Immune Support Kit "aids in immune function; provides natural antiviral support; useful for those who are immune compromised or HIV positive." A copy of the "Immune Support Kit (1-2 Months)" page from the Clinic website is attached as **Tab "K"**
- 25. It is agreed that the Registrant endorsed drugs, products and brands of equipment, including but not limited to "Clear" drugs, products and brands of equipment used in her practice (see Tabs "D" and "F").
- 26. It is further agreed that the conduct described in paragraphs 19-25 above, is a breach of the College's standards of practice on Advertising.

#### Fees and Billing

- 27. It is agreed that the Registrant charged block fees for the Hormone Diet Bootcamp and Clear Medicine Wellness Program.
- 28. It is further agreed that the Registrant permitted the issuance of inaccurate and misleading naturopathic receipts in her name and in the name of the Clinic. Specifically, the Registrant issued receipts for naturopathic services in her name and through the Clinic to participants of her Hormone Diet Boot Camp. It is agreed that the Hormone Diet Boot Camp is actually a group lecture series based on the Registrant's books. See Tab J.
- 29. It is further agreed that the conduct described in paragraphs 27-28 above, is a breach of the College's standards of practice on Fees and Billing.

#### **Prior History**

- 30. The Registrant has a prior history with the College.
- 31. On November 2, 2017, the Inquiries, Complaints and Reports Committee ("ICRC") of the College considered concerns that the Registrant was performing a controlled act that she was not authorized to perform, that the Registrant contravened the standards of the profession and that the Registrant used or permitted the use of a testimonial from a patient, former patient, or other person in respect of the Registrant's practice in her advertising. The ICRC ordered the Registrant to complete a SCERP, including requiring the Registrant to review the Advertising and Conflict of Interest Standards, complete a report of 750-1000 words providing an analysis of her online presence, and her compliance with the standards and guidelines. The ICRC also ordered the Registrant to attend for an oral caution.
- 32. In October 2021, the Registrant was found to have engaged in professional misconduct by a panel of the Discipline Committee relating to advertising and selling "immune boost" kits that allegedly prevented COVID-19. The Registrant admitted that she contravened the advertising and conflicts of interest standards, recommended ineffective treatment, provided services beyond her knowledge skill or judgement, sold a substance for an improper purpose, acted in a conflict of interest, made claims that could not be supported as a reasonable professional opinion, and engaged in unprofessional conduct. The penalty proceeded by way of agreement and included a reprimand, three (3) month suspension,

terms, conditions and limitations ("TCLs") including PROBE and a reflective essay, a fine and costs in the amount of \$5,000.

#### **Admissions of Professional Misconduct**

- 33. It is agreed that the above-noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the Health Professions Procedural Code, being Schedule 2 to the Regulated Health Professions Act, 1991 (the "Code"), as set out in the following paragraphs of section 1 of Ontario Regulation 17/14 made under the Act:
  - a. **Paragraph 1** Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:
    - Core Competencies (Tab "L");
    - ii. Advertising (Tab "M");
    - iii. Fees and Billing (Tab "N");
    - iv. Prescribing (Tab "O");
    - v. Recommending Non-Scheduled Substances (Tab "P"); and
    - vi. Selling (Tab "Q").
  - Paragraph 8 Providing or attempting to provide services or treatment that the Registrant knows or ought to know to be beyond the Registrant's knowledge, skill or judgment;
  - c. **Paragraph 10** Performing a controlled act that the member is not authorized to perform;
  - d. **Paragraph 14** Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;
  - e. **Paragraph 17** Acting in a conflict of interest when acting in a professional capacity;
  - f. Paragraph 26 Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion; and
  - g. **Paragraph 27** Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable:
  - h. **Paragraph 28** Using or permitting the use of a testimonial from a patient, former patient or other person in respect of the member's practice;
  - i. **Paragraph 31-** Inappropriately using a term, title or designation indicating or implying a specialization in the profession:

- J. Paragraph 36 Contravening, by act or omission, a provision of the Act, the Regulated Health Professions Act, 1991 or the regulations under either of those Acts, including but not limited to the General Regulation and section 4 of the Act;
- k. Paragraph 46 Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable and unprofessional; and
- Paragraph 47 Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession.

#### Acknowledgements

- 34. By this document, the Registrant states that:
  - a. She understands fully the nature of the allegations made against her;
  - b. She has no questions with respect to the allegations against her;
  - c. She admits to the truth of the facts contained in this Agreed Statement of Facts and that the admitted facts constitute professional misconduct;
  - d. She understands that by signing this document she is consenting to the evidence as set out in the Agreed Statement of Facts being presented to the Discipline Committee;
  - e. She understands that by admitting the allegations, she is waiving her right to require the College to prove the allegations against her at a contested hearing;
  - f. She understands that the decision of the Committee and a summary of its reasons, including reference to her name, will be published in the College's annual report and any other publication or website of the College;
  - g. She understands that any agreement between her and the College with respect to the penalty proposed does not bind the Discipline Committee; and
  - h. She understands and acknowledges that she is executing this document voluntarily, unequivocally, free of duress, and free of bribe and that she has been advised of her right to seek legal advice.

ALL OF WHICH IS RESPECTFULLY SUBMITTE Signed this 4 day of Ayrd, 2022	D. Signed this 4th day of April , 2022
1119	Andu .
Dr. Natasha Turner, ND Registrant	Andrew Parr, CAE Chief Executive Officer
	College of Naturopaths of Ontario

# TAB A



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Status as of: 04-Apr-2022 16:38 NOT A PRACTICE PERMIT



Dr. Natasha Sepherha Turner, ND

Registrant Number: 0894

**Initial registration:** 28-Oct-1999 (Initial Registration with the BDDT-N)

Nickname / abbreviation: N/A

Previous name: N/A

**Current Registration** 

Class Status

General In Good Standing

Effective Expiry

01-Apr-2022 31-Mar-2023

Terms, Conditions and Limitations

Condition of registration (Effective: 29-Oct-2021)

On October 29, 2021, the Discipline Committee imposed the following specified terms, conditions and limitations on the Registrant's certificate of registration:

- Requiring that the Registrant unconditionally pass, and at their own expense, the PROBE course in ethics and boundaries, no later than six months from the date of the order of the Discipline Committee; and
- Requiring that the Registrant write an essay between 1000 and 1500 words in length, and provide it to the
  Chief Executive Officer, no later than a date selected by the Chief Executive Officer that shall be published
  by the College at a time and in a format determined by the Chief Executive Officer, on the following issues:
  - i. The lessons they learned in completing the PROBE course; and
  - ii. The methods they will incorporate into their practice to ensure proper compliance with the standards and their obligations as a registrant of the College.

#### **Findings**

Hearing date: October 29, 2021 Decision date: November 26, 2021

The Panel finds that the Registrant committed acts of professional misconduct as admitted by the Registrant in the Agreed Statement of Facts.

Decision and Reasons of the Discipline Committee, file DC20-02

#### **ICRC Outcomes**

#### Appearance for a Caution

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Date ordered: November 2, 2017

Date completed: March 1, 2018

On March 1, 2018, the Registrant attended before a panel of the Inquiries, Complaints and Reports Committee to be cautioned.

At the outset, the Panel noted that the Registrant's website indicated that the Registrant was trained in bio-identical hormone replacement and that she was able to prescribe this form of treatment prior to having met the Standard of Practice for Prescribing. The Registrant was reminded that the Prescribing course and exam are required by the College in order to ensure that appropriate knowledge, skill and judgment exist with regards to therapeutic prescribing. The Panel cautioned the Registrant that having BHRT training did not permit her to prescribe drugs or substances and that her failure to comply with this statutory requirement might have put her patients at risk.

The Panel further outlined its concerns with respect to the Registrant's advertising, which included issues with testimonials, prescribing, conflict of interest as well as use of restricted titles.

The Panel acknowledged that the Registrant had taken steps to amend her advertising in order to comply with the professional standards. Nevertheless, as the Registrant's website appeared to continue to advertise brand name products to the public, she was cautioned that endorsing products is in contravention of the College's Advertising Standard, and may also be perceived as a conflict of interest, regardless of whether or not the products were designed or formulated by the Registrant.

It was also concerning to the Panel that the Registrant appeared to advertise product kits, sell drugs or substances and recommend non-scheduled substances outside the context of the naturopathic doctor-patient relationship. The Panel reinforced with the Registrant that naturopaths in Ontario are only able to recommend or sell a compounded drug or substance to their patients within the context of the naturopathic doctor-patient relationship. In addition, registrants are expected to conduct a thorough assessment of the patient, to monitor and document the patient's response to the therapy and any adverse reactions, and adjust dosage or discontinue the therapy as appropriate.

The Panel further outlined its concerns with regard to the Registrant's billing practices. The Registrant was reminded that block fees are not available to naturopaths in Ontario and that issuing an invoice, bill or receipt that the Registrant knows or ought to know is false or misleading is an act of professional misconduct under the Naturopathy Act.

In conclusion, the Panel noted that should the Registrant commit similar or analogous conduct, the Panel will have no choice but to take stronger action, including a referral to the discipline committee.

#### **ICRC Outcomes**

#### Specified Continuing Education and Remediation Program (SCERP)

Date ordered: November 2, 2017

Date completed: February 14, 2018

On November 2, 2017, a panel of the Inquiries, Complaint and Reports Committee (ICRC) of the College determined that the Registrant shall review the Standards of Practice for Advertising, Conflict of Interest and

Restricted Titles, as well as the Practice Guidelines for Advertising and Conflict of Interest, and, within 45 days of the date of the Decision, deliver to the CEO a report of 750 - 1000 words acceptable to the CEO, providing detailed analysis of her online presence, including her professional websites, online publications and television appearances, in terms of her current and future compliance with the aforementioned standards and guidelines.

#### **ICRC** Referrals

Referred To: Discipline Committee Referral Date: November 4, 2021

Hearing Date: TBD

Notice of Hearing

#### STATEMENT OF SPECIFIED ALLEGATIONS

#### The Registrant

- 1. Dr. Natasha Turner, ND (the "Registrant") registered with the Board of Directors of Drugless Therapy Naturopathy on or about October 28, 1999. The Registrant then became registered with the College of Naturopaths of Ontario (the "College") on July 1, 2015.
- 2. The Registrant has not successfully completed a course on prescribing approved by Council and/or an examination on prescribing administered or approved by Council and therefore is not authorized to prescribe drugs and/or substances.
- 3. At all relevant times, the Registrant worked at and/or owned Clear Medicine in Toronto, Ontario (the "Clinic").

#### Prescribing and/or Selling

- 4. It is alleged that between approximately March 1, 2018 and February 24, 2021, the Registrant:
  - a. Recommended and/or prescribed and/or sold Vitamin D to their patient(s) in excess of 1000 IU; and/or
  - b. Recommended and/or sold Vitamin D to the public in excess of 1000 IU and/or other treatments or substances via their Clinic website.
- 5. It is alleged that the Registrant prescribed or sold a drug or a substance for an improper purpose including but not limited to recommending or selling "treatment-specific kits" on the Clinic website and not within the context of a registrant-patient relationship and/or without conducting an assessment.

#### Recommending non-scheduled substances

6. It is alleged that the Registrant offered and/or sold and/or recommended non-scheduled products and/or services and/or drugs to the public on the Clinic website and not within the context of a registrant-patient relationship and/or without conducting an assessment.

#### Advertising

- 7. It is alleged that the Registrant permitted statements to be posted on their social media and/or Clinic website as a guarantee of success including but not limited to the following:
  - a. "The book is based on their successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Their second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011"; and/or

- b. The Hormone Diet will result in eating less and exercising more.
- 8. It is alleged that the Registrant permitted the use of testimonial(s) from a patient, former patient and/or other person in respect of their practice and/or products on the Clinic website.
- 9. It is alleged that the Registrant indicated and/or implied that they were a specialist in the profession including but not limited to publishing the following:
  - a. "one of North America's leading naturopathic doctors";
  - b. "natural health expert";
  - c. "health expert";
  - d. "a leader in her field"; and/or
  - e. "endorsed by New York Times best selling authors."
- 10. It is alleged that the Registrant advertised a comparative or superlative statement about their service, quality, products or people including but not limited to publishing the following:
  - a. "one of North America's leading naturopathic doctors ... natural health expert .. a leader in her field ...endorsed by New York Times best selling authors ..." and/or
  - b. "With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada."
- 11. It is alleged that the Registrant made a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as a reasonable professional opinion including but not limited to publishing the following:
  - a. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011".
- 12. It is alleged that the Registrant permitted advertising of their practice in a manner that was false or misleading and/or that includes statements that are not factual and verifiable including but not limited to publishing the following:
  - a. "one of North America's leading naturopathic doctors ...";
  - b. "The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011"; and/or
  - c. Immune Support Kit "aids in immune function; provides natural antiviral support; useful for those who are immune compromised or HIV positive."
- 13. It is alleged that the Registrant endorsed drugs, products and/or brands of equipment, including but not limited to "Clear" drugs, products and/or brands of equipment," used in their practice.

#### Fees and Billing

14. It is alleged that the Registrant charged block fees for the Hormone Diet Bootcamp and/or Clear Medicine Wellness Program.

15. It is alleged that the Registrant permitted the issuance of inaccurate and/or misleading naturopathic receipts in their name and/or in the name of the Clinic.

#### Acts of Professional Misconduct

16. It is alleged that the above noted conduct constitutes professional misconduct pursuant to section 51(1)(c) of the *Health Professions Procedural Code*, being Schedule 2 to the *Regulated Health Professions Act, 1991* (the "Code") as set out in one or more of the following paragraphs of section 1 of Ontario Regulation 17/14 made under the *Naturopathy Act, 2007*:

- a. **Paragraph 1** Contravening, by act or omission, a standard of practice of the profession or failing to maintain the standard of practice of the profession, including but not limited to the following:
  - i. Core Competencies;
  - ii. Advertising;
  - iii. Fees and Billing;
  - iv. Prescribing;
  - v. Recommending Non-Scheduled Substances; and/or
  - vi. Selling.
- b. **Paragraph 8 -** Providing or attempting to provide services or treatment that the member knows or ought to know to be beyond the member's knowledge, skill or judgment;
- c. Paragraph 10 Performing a controlled act that the member is not authorized to perform;
- d. **Paragraph 14** Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose;
- e. Paragraph 17 Acting in a conflict of interest when acting in a professional capacity;
- f. **Paragraph 26** Making a claim respecting a drug, substance, remedy, treatment, device or procedure other than a claim that can be supported as reasonable professional opinion;
- g. **Paragraph 27** Permitting the advertising of the member or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable;
- h. **Paragraph 28** Using or permitting the use of a testimonial from a patient, former patient or other person in respect of the member's practice;
- i. **Paragraph 31** Inappropriately using a term, title or designation indicating or implying a specialization in the profession;
- j. **Paragraph 36** Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts including but not limited to Regulation 168/15 and/or s. 4 of the Act;
- k. **Paragraph 46** Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional; and/or
- I. **Paragraph 47** Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession.

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Show: Registration History

Employment

15

# TAB B







17

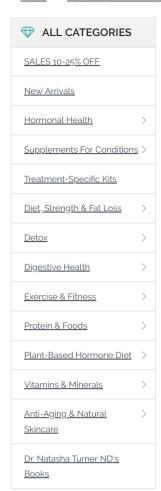
★ Home

<u>e</u> Cart

<u> Sign in</u>

••• More

# HOME > SUPPLEMENTS FOR CONDITIONS > STRESS > CLEAR VITAMIN D3 DROPS (60 ML)







<u>≡ SIDEBAR</u>

Clear Vitamin D3 Drops (60 mL)

\*\*\*\*\*\*

CAD \$23.90

Brand

Clear Medicine

Quantity:

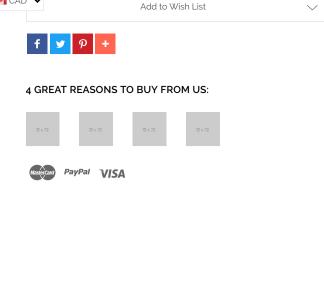
Clear Medicine

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Add to Ca

Need help? Chat with us!





**Q** Click to zoom in









**DESCRIPTION** 















#### **Product Benefits**

- ✓ Supports Bone and Dental Health
- √ Supports Modulation of Immune Function
- $\checkmark$  Supports Healthy Cell Differentiation
- $\checkmark$  Supports Neurological and Cognitive Health
- √ Supports Musculoskeletal Comfort
- $\checkmark$  Supports Cardiovascular Health and Healthy Blood Sugar Metabolism
- ✓ Supports Vitamin D Repletion in Cases of Dietary Deficiency, Limited Sunlight Exposure, or Use of Depleting Therapies

Vitamin D increases absorption of Calcium from intestines. It assists reabsorption of calcium into bones and promotes optimal bone density. Vitamin D supports immune function and maintains a normal inflammatory response.

- Aids Calcium Absorption
- Supports Bone Health
- Colon, Breast, Pancreas Health
- Cell Growth
- Healthy Immunity
- Weight Loss
- · Diabetes and Heart Disease
- Healthy Pregnancy

75% of Americans are deficient in Vitamin D. This critical nutrient is believed to naturally decline in the body and become harder to absorb and synthesize as we age. New research suggests that use of sunblock, with even a low SPF of 8, can reduce natural Vitamin D production by 95%. Adequate calcium and Vitamin D intake throughout life, along with physical activity, may reduce the risk of brittle bone health in later life. Vitamin D promotes peak bone density and mineralization by optimising absorption of calcium and phosphorus through the intestines.

Vitamin D's assistance in maintaining healthy calcium levels is also believed to play a part in promoting cardiovascular health. Due to its beneficial effect on normal cell growth and metabolism, Vitamin D is believed to support breast, prostate, and colon health. Vitamin D may also influence immunefunction by promoting activity of macrophages and lymphocytes. It is one of the critical nutrients that help maintain the body's normal inflammatory response

Bone Health: The body needs vitamin D to absorb calcium, and the importance of vitamin D in skeletal health and bone density is well established. Although bone density is most often associated with calcium intakes, insufficient vitamin D negatively affects calcium absorption. Without adequate absorption, the body must take calcium from its stores in the skeleton, which weakens existing bone and prevents the formation of strong, new bone. Clinical research shows that taking vitamin D orally with calcium supplements can support healthy bone turnover, and adequate calcium and vitamin D throughout life—as part of a well-balanced diet—may reduce the risk of osteoporosis.

The Expanding Roles of Vitamin D: The role of vitamin D in good health continues to expand as the knowledge of this vitamin's effects on different body. systems grows. Research now suggests that optimal serum levels of vitamin D support normal cell differentiation, cardiovascular health, normal  $immune\ function,\ good\ balance,\ healthy\ mood,\ normal\ fetal\ development,\ neuronal\ growth\ and\ neurodevelopment,\ healthy\ glucose\ metabolism,$ musculoskeletal comfort, periodontal health, and normal intestinal immune responses. Areas of research that have gained momentum over the past several years concern the relationship of vitamin D deficiency or insufficiency to changes in cellular proliferation, changes in fetal brain development, and mental health.

#### Ingredients:

Ingredients: Vitamin D3 (as Cholecalciferol) 1000IU per drop.

Recommended Dosage: Shake well before using. Take one drop, one to two times daily (plain or in liquid), or as directed by your healthcare practitioner.

Contraindications: Consult your healthcare practitioner prior to use. Ir ▶ CAD → ng medication should discuss potential interactions with their healthcare practitioner. Do not use if tamper seal is damaged.

#### Other top rated products







Dream Protein (720g) ☆☆☆☆☆(0)



Clear Nova Scotia Marine... ☆☆☆☆**☆(0)** 



Pure Form Omega - Org... ☆☆☆☆☆(0)



Clear Detox - Dige ☆☆☆☆☆(0)







🗹 WRITE A REVIEW

#### Reviews (1)



A simple way to get

A simple way to get your daily dose of sunshine. Love this product because it's effortless, doesn't taste like much or anything and gives you enough vitamin D when you can't get enough of it on your own.

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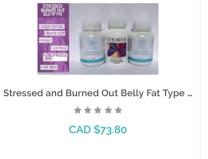




Foundation Kit -Detox (The Hormone Die...

★★★☆1 Review

CAD \$230.49





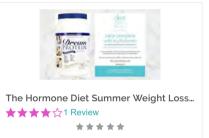


Sluggish Belly Fat Type Kit (30 Day Supp...

★★★★1 Review

★★★★

CAD \$117.35



CAD \$137.89





The Hormone Diet Alternative To Intermi...

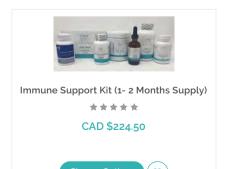
★★★★ 3 Reviews

★★★★

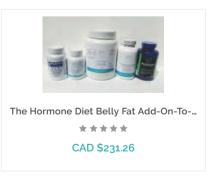
CAD \$169.60 - CAD \$204.88

















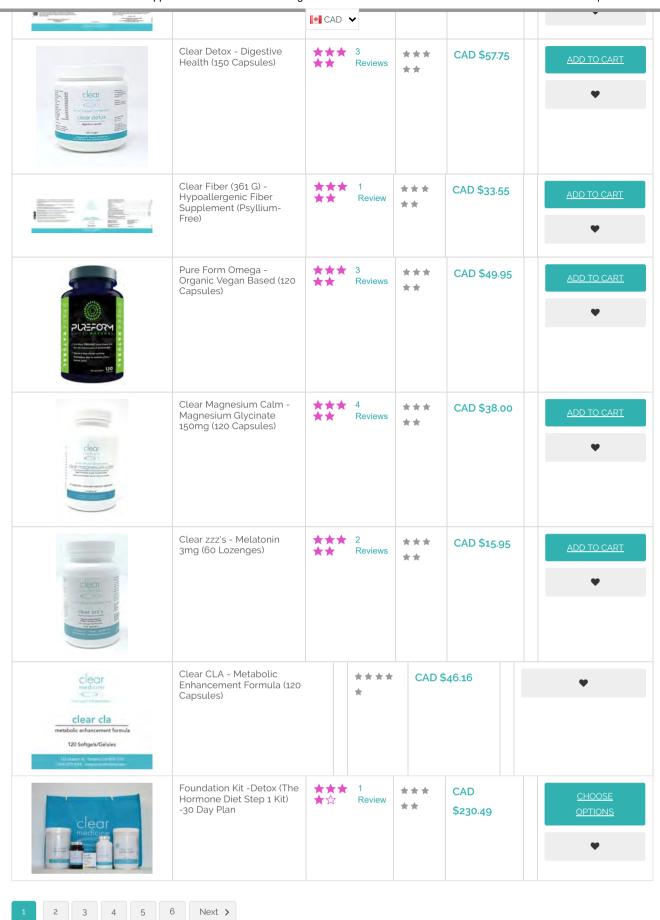


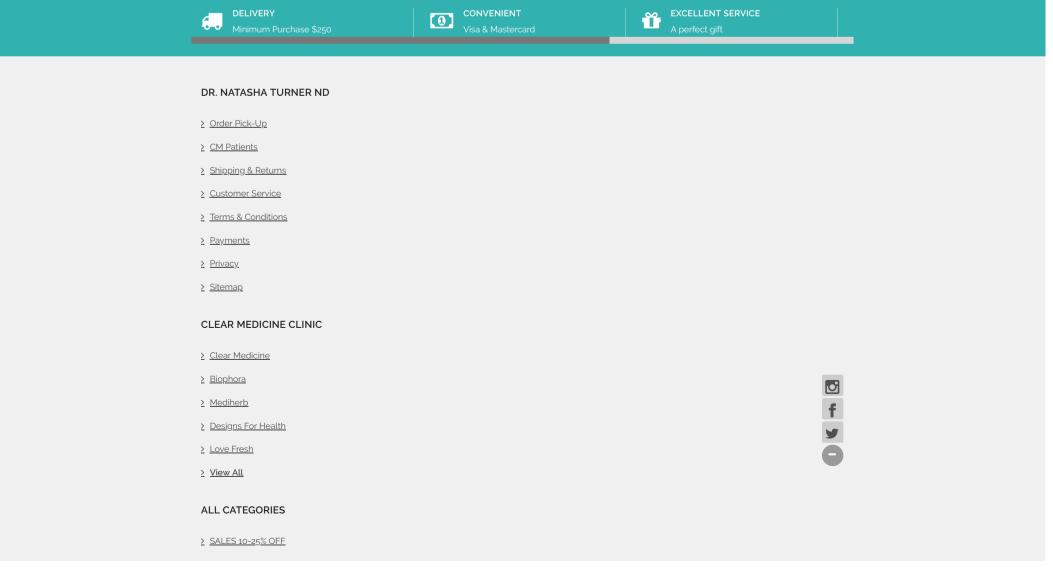


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https://shop.drnatashaturner.com/kits/

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#### ABOUT DR. NATASHA TURNER ND



Dr. Natasha Turner ND a New York Times bestselling author and one of North America's leading naturopathic doctors, a sought-after speaker, natural health expert and the founder of Clear Medicine Wellness Boutique in Toronto. In 2014 she was recognized by her professional organization as a leader in her field and in 2016 was awarded the top spot on a list of North America's Most Innovative Health Experts. Bright, energetic and practicing what she preaches, her goal is to inspire others to make positive lifestyle choices in order to enjoy healthier lives. Her passion for promoting wellness, fitness and integrated medicine makes her a sought-after speaker for corporations, the public and the education of other medical professionals. Her work has been endorsed by New York Times bestselling authors, Suzanne Somers, Dr. William Davis, and Dr. Christine Northrup, as well as Dr. Mache Seibel faculty member, Harvard Medical School and bestselling author of The Estrogen Window.

Dr. Turner ND's first book, The Hormone Diet, became a #1 bestseller within one week of its release in the spring of 2009 and was the top selling health book in Canada for that year. The book is based on her successful clinical approach for creating hormonal balance to gain strength, lose fat and live younger longer. Her second book, The Supercharged Hormone Diet, an accelerated 30 day plan to restore your metabolism and look younger longer, became a #1 national bestseller on its first day of release in March 2011. Upon its USA release in November 2011 it became a New York Times bestseller. Her third book, The Carb Sensitivity Program: Discover Which Carbs Will Curb Your Cravings,

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Control Your Appetite and Banish Belly Fat made the bestseller list the first week of its release in March 2012. In December 2016, Dr. Turner ND released her fourth book *The Hormone Boost*, which became a #1 bestseller as well. It is a simple and effective wellness plan that harnesses the power of the six hormones linked to weight loss, strength and energy.

Dr. Turner ND has been referred to as a friend of The Dr. Oz Show by Dr. Oz and has appeared more than nine times on the show. She is also a regular guest on The Marilyn Denis Show. She contributes to various magazines, radio and television programs as a natural health expert and a regular columnist to Vitalize Magazine.

- ~ Instagram @drnatashaturner
- " Facebook @natashaturner or @thehormonediet
- ~ Twitter @drnatasha

Contact 416.579.9105 or email clinic@clearmedicine.com to become a patient, join an upcoming Hormone Diet Bootcamp or find out more about our corporate wellness seminars. Download more information about Dr. Natasha Turner ND

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4.5 Rating

**40 Reviews** 

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# TAB F



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### How to boost your metabolism, gain energy and lose weight

BY NATASHA TURNER | AUGUST 1, 2018

Why "Summerize" your body and your metabolism right after spring cleaning your home, decluttering your space and shaping up your finances? Well, it makes good sense and I suggest that you think of it as a required "metabolic wake-up" after transitioning from winter, the season where our metabolism is naturally the slowest.

Yes, it's true, we are physiologically and mentally set-up for weight gain and lethargy in the winter due to a drop in thyroid hormone, your metabolic master, and mood hormones, which control your cravings for comfort food.

At 47, I have learned that the same <u>Hormone Diet</u> tricks that worked at 30 years old, need some adjustments now. So, over the past year, I have made it my mission to find a solution! And as a result of my research and clinical experience, I've come up with an overview of the perfect "Hormone Diet Day for Fat Loss". In real simple terms these are the benefits you can expect:

- More Energy which inspires you to do more and start to move more.
- Better Brain Power for increased motivation, focus, drive, energy.
- Shedding of Excess Winter Weight without a subsequent decrease in metabolism or energy, while only losing fat and maintaining muscle. You'll also keep your hunger, energy, and cravings in check to stay on track.

Here are my top five tips for a metabolic boost and fat loss reset. Aim to adopt at least one of these habits at certain times of the day – but it's even better if you can achieve them all!

#### Morning: It's ALL about the tracking!

After my own research, experimentation and clinical experience, my patients have been taught to become metabolic detectives and fat loss experts by measuring ketones along with their weight. Ketones present in the urine indicate that your body is burning fat. We can cause our body to burn fat by restricting carbohydrates and sugar, reducing calories, moving more and fasting (when done correctly). Measuring ketones does not mean following "The Keto Diet", which I do not recommend, especially for women and we can discuss at another time.

My own new personal approach and that used with my patients is still based on balancing hormones but is now also based on a philosophy that is simple: when you exercise less, I want to help you to eat less; and when you exercise more, I will help you chose the right foods to eat more. According to the latest research, about 96 percent of people tend to gain weight back—plus more—with the typical approach of cutting calories/exercising more. Clearly, this does not work and only leads to future weight gain, to say nothing of metabolic damage as the stress it causes only furthers a greater drop in thyroid hormones drop and loss of precious metabolically active muscle.

You will never again – eat less and exercise more! Your dietary habits, how much you move, and how much you exercise are inseparable. I want you to start living each day by asking yourself this question: How much am I going to move today?

Then you must spend only five minutes in the morning to record two numbers:

- 1. Your urinary ketone measurements, tested by ketone strips you can purchase from your local pharmacy or through shop.drnatashaturner.com, which indicate if your body is burning fat;
- 2. Your weight.

Record these on the tracking sheet. An example I have specifically designed for my patients and for use myself is <u>available on my</u> blog.

I believe consistent tracking is the most important part – even if you do not change your diet at all as you can begin to see your activity or your diet can influence fat loss, as well as both in unison together. These two numbers will always reflect the impact of your dietary habits and your activity completed in the previous day.

#### Morning: Take my 3-month breakfast challenge - you won't believe the benefits!

Go to your local health food store and pick up these simple items to mix in a shaker cup with as much water as you prefer (I prefer less water!) and begin your day by drinking these three ingredients:

Creatine: Did you know this is one of the only supplements proven to increase energy, muscle growth/recovery, and brain power? Yes, its' true – it is not just for muscle-bound body builders anymore because almost everyone can take it for mental function, energy, and preserving muscle mass. It is also excellent for concussion victims. Take 5 grams – about 1 tsp. per day and make sure its pure and simple creatine with no added sugars or caffeine. My mixture is clean with some extra benefits, such as glutamine and amino acids that aid in muscle recovery, and it is called Clear Recovery.

- Marine Collagen (hydrolyzed and with Vitamin C): As we age, our body's ability to produce new collagen declines and existing collagen begins to break down. The loss of collagen effects skin, joints, and bones. The decreased collagen had also lead to increased digestive problems, weakened immune system, and increased risk of chronic illness. A recent article in the Globe and Mail turned me on to collagen's benefits for tendons, bones, ligaments, and repair after exercise as the scientists gave 15 grams to the athletes (so you will need to take about one and a half tablespoons). The researchers saw great improvements in the 15-gram dose. By the way, 5 10 grams didn't do the trick it must be 15g or more. Since then I have gone on to find these additional benefits of marine collagen: it builds bone strength, boosts thyroid, improves skin, hair, and nails and even wrinkles, stabilizes blood sugar, boost the mood hormone and brain function, reduces inflammation, heals inflammation and immunity within the gut and helps with joint pain.
- Whey Protein: For immunity, muscle, metabolic, antioxidant and strength benefits toss 1 to 2 scoops (at least 20 to 30 grams for women; and 30 to 40 grams for most men) in your cup. I prefer vanilla flavor because it can mix easily with the creatine and collagen. If you can't take whey protein, pea or hemp protein can work too.

Shake, drink and devour all these wonderful metabolic, energy, and body benefits from the one simple concoction of these three supplements. I can tell you something else – I am never ever sore from my intense workouts and I feel energized and focused all morning. Best to shake and not to blend as these are delicate proteins.

Afternoon: Pay attention to how you feel: You may need to change when you eat certain foods and in which combinations.

- Craving muffins or pastries at 3 pm? Definitely cut the carbs from breakfast, increase your protein to hit your 30 to 40 gram goal per meal and add a fiber supplement to your smoothies at breakfast.
- Add fibre or water-based foods. The perfect afternoon snack is watermelon or berries with soluble fibre supplement, as this
  fibre makes you full and aids in decreasing inflammation in the gut. Read more here.
- If you have strength trained on a certain day, include protein here like sliced turkey with two cups of spicy zucchini green beans (check out Oh MY Sprice, they are great!).

Evening: It's ALL about the tracking and you must get results weekly! If one week goes by without favorable changes, while you are following your plan, get help – change your plan and reset your approach.

- Return to your tracker from the morning for 5 more minutes. Track your diet intake daily as well as how you feel your energy, hunger, cravings and activity. You need to become a metabolic detective everybody is different, and diets always need adjustments how you feel at the end of the day is a direct result of your dietary intake and activity during each day.
- Assess your protein intake for the day if you are low drink a protein supplement or chocolate meal replacement (low in carbs and fats) and go to bed!
- Still no results test your thyroid levels (TSH, Free T3 and Free T4) you can visit my clinic <u>Clear Medicine</u> or see an ND in
  your area. The most important thing is stay motivated and to approach your health with a sense of urgency and proper
  direction for results!

# TAB G

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Control Your Appetite and Banish Belly Fat made the bestseller list the first week of its release in March 2012. In December 2016, Dr. Turner ND released her fourth book The Hormone Boost, which became a #1 bestseller as well. It is a simple and effective wellness plan that harnesses the power of the six hormones linked to weight loss, strength and energy.

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- ~ Instagram @drnatashaturner
- " Facebook @natashaturner or @thehormonediet
- ~ Twitter @drnatasha

Contact 416.579.9105 or email clinic@clearmedicine.com to become a patient, join an upcoming Hormone Diet Bootcamp or find out more about our corporate wellness seminars. Download more information about Dr. Natasha Turner ND

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Pure Form Omega - Org... ☆☆☆☆☆(0)



Clear Detox - Dige ☆☆☆☆☆(0)







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#### Reviews (1)



### A simple way to get

A simple way to get your daily dose of sunshine. Love this product because it's effortless, doesn't taste like much or anything and gives you enough vitamin D when you can't get enough of it on your own.

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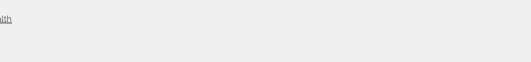
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#### **Dr. Natasha Turner**

@drnatasha

Founder @ClearMedicineTO; NYT Bestselling Author The Supercharged & The Hormone Diet. Speaker & Health Expert; Regular Guest @DrOz & @MarilynDenisCTV Shows

**632** Following **6,951** Followers

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Dr. Natasha Turner Retweeted



Shaun Gauthier @FitnessShaun · Mar 4

@drnatasha I have never heard of you until just seeing you on the @MarilynDenisCTV Extremely refreshing and impressive you are! #fanforlife

9

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**1** 

🗘 Dr. Natasha Turner Retweeted



Dr. Theresa Nicassio @TheresaNicassio · Feb 13

OMG-what an incredible interview with @drnatasha about #ketodiet #IntermittentFasting #dieting #hormones #HealthyLife #HealthyEating! theresanicassio.com/portfolio/nata... #WUVIP #EliminationDiet #Hormones #womenshealth @shiatsuwife #fertility #estrogen #breastcancer #ketosis #losingfat #carbs



THE Dr. THERESA NICASSIO SHOW

STARTING FEBRUARY 13, 2020 AT 9AM PT

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**Dr. Theresa Nicassio** @TheresaNicassio · Feb 11
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HOW TO WER UP YOUR ESSENTIAL EMONES





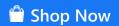


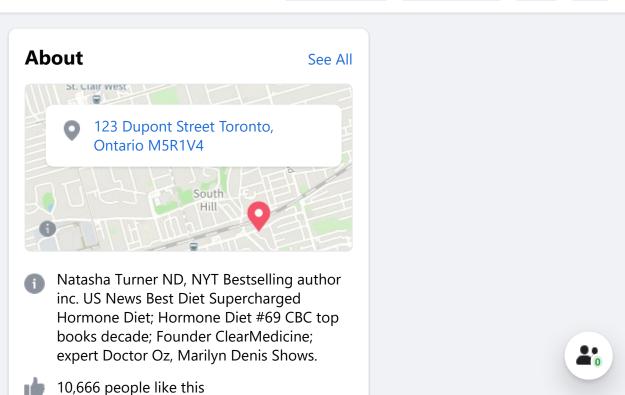




## **The Hormone Diet**

@thehormonediet · Alternative & Holistic Health Service





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## CLEAR MEDICINE WELLNESS (THE HORMONE DIET BOOTCAMP)

With now over 1000 successfully transformed bootcampers, we are proud to say that The Hormone Diet Bootcamp is one of the top wellness programs in Canada. In FIVE short weeks you will build the foundation for better hormonal health. This group program is based on Dr. Turner ND's The Hormone Diet and The Supercharged Hormone Diet books.

Dr. Turner ND's passion and fascination about the interconnectedness of hormones and the number of bodily functions they influence fostered the motivation behind her first book, The Hormone Diet. She found her own issues of hormonal imbalance and early experiences in clinical practice swiftly demonstrated the standard treatment for a seemingly uncomplicated hormonal issue such as low metabolism/thyroid hormone (a.k.a subclinical hypothyroidism, currently estimated to impact as many as 4 out of 13) or fullblown hypothyroidism—via simply replacing thyroid hormone—was by no means the complete solution. In fact, it was frighteningly inadequate in many cases.

Today, at Clear Medicine, we rarely rush to treat thyroid deficiency right away. Instead we start by working to detoxify our patient's liver and digestive system that influences the production of active thyroid hormone; to balance stress hormones with good sleep and stress management; to level out blood sugar and insulin; to replenish the nutrients needed to make essential hormones; and to address hormone imbalance, which impact vitality and wellness.

I currently wrote a blog All The Ways That The Hormone Diet Tackles Belly Fat. Please read it here.

### The Hormone Diet Bootcamp: Curb Cravings, Beat Belly Fat and Feel Younger Longer

And so from Dr. Turner ND's bestselling books, the 5-Week Hormone Diet Bootcamp was born. This interactive, engaging and effective group approach has allowed hundreds of participants to successfully determine why they haven't been able to beat those stubborn pounds and, most importantly, attain total health. It outlines a strategy that

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ensures hard work in the gym and a healthy kitchen is rewarded in the way you've always hoped they would be.

The mere mention of "hormones" can conjure images of menopausal women or nefarious food additives. Indeed, many patients seek to address these specific concerns. But this program is definitely not only for those with hormonal issues. It is not even strictly directed at people seeking to lose weight. We have used this approach to successfully treat thousands of patients with a broad spectrum of health goals. Some needed to gain much-needed muscle. Others wanted healthier looking skin. Still, others wanted to get rid of headaches, improve their sleep, ease their digestion, increase their energy, improve their fertility or sharpen their memory.

While many of us believe we can get healthy by losing weight. The truth is we must be healthy to lose weight. When you complete the steps outlined in this 5-week plan, you will optimize your hormonal balance, lose unwanted fat and restore your health in the process. This process is for everyone because, unlike so many other "diet" programs these days, The Hormone Diet Bootcamp offers a complete wellness plan that addresses every cause of health imbalance because it promotes vital bodily functions from head to toe, inside and out.

#### A Proven Method for Restoring Health Balance

**Pre-Bootcamp:** Designed to set the stage for your success! Your Best Body Assessment will uncover your metabolic rate, muscle mass, waist-to-hip ratio, and body fat percentage. Do you need to gain muscle? Is your current body composition placing you at risk for diabetes, heart disease, osteoporosis and/or obesity?

#### Week 1 – Begin Your Detox:

Discover the five most common hormonal imbalances: high insulin, high cortisol, toxic estrogen, low thyroid, and inflammation (not a hormonal imbalance but inflammation influences how your hormones work and your ability to lose weight). How to optimize your digestion and optimize liver function via detox

The Hormone Diet Detox prescription – including permitted foods,

Based on The Supercharged Hormone Diet book.

#### Week 2 – Repair and Rejuvenate:

What happens when your body is acidic How your sleep affects your hormones, appetite, and cravings Recommendations to combat sleep problems Stress management techniques that really work

Based on The Supercharged Hormone Diet book.

#### Week 3 - Transition Week From Your Detox:

Eliminate gas, bloating, headaches, water retention, puffy eyes and more Learn the rules for hormonally-balanced eating How to avoid hidden sugars and beat cravings Best fiber sources to flatten your stomach

Based on The Supercharged Hormone Diet book.

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#### **Week 4 – Learn the Rules of Eating for Hormonal Balance:**

Discover what hormone-disrupting foods you should avoid The best protein, fat and carb selections in the grocery store Learn how to eat at the right time and in the right amounts Nutrition tips to increase energy, prevent cravings and remain slim

Based on The Hormone Boost book.

#### **Week 5 – Next Steps and Hormone Optimization Training:**

Discover the 10 most common workout mistakes
Hormonally balanced breakfast, lunch and dinner meal plans
How to cheat once a week and still lose weight
Recommendations for dining out and staying on track

**Post-Bootcamp:** Book an appointment for your final weigh-in and Best Body Assessment. Continue to work with one of our Naturopaths or Nutritionists one-on-one to discuss your specific blood values, results of your hormonal health profile and any health concerns, if desired.

#### **Bootcamp (Co-Ed)**

Best of all, the Bootcamp is taught by a naturopathic doctor so the majority of the program fees is covered under your health insurance provider under Naturopathic Services. Please check your individual provider to confirm. Another bonus – you get all the basic detox supplements included as well as a copy of The Supercharged Hormone Diet. As a bonus, bootcamp participants also receive Dr. Turner ND's new book The Hormone Boost.

#### **Next Session:**

WEDNESDAY APRIL 17TH EVENING CLASS 6:40 pm (parking on north side of Dupont as of 6:30 pm)

THURSDAY APRIL 18TH – DAYTIME CLASS 11:30 AM (parking on north side of Dupont until 3:30 pm) \*please note we will need a minimum of 12 participants for the afternoon class

#### Location:

Clear Medicine: 123 Dupont Street Toronto, On, M5R 1V4

The program runs for 5 consecutive weeks. All classes are taught by Dr. Natasha Turner ND and the Clear Medicine Team. All classes take place at 123 Dupont Street, corner Davenport Road in Toronto. Payment and pre-registration is required to reserve your spot.

#### **Program Add-Ons:**

Program Add-on (Additional fees apply): Dr. Turner ND has partnered with Gamma

Dyna Care Laboratories to provide our patients with access to a specialized list of blood

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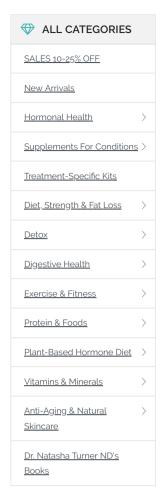
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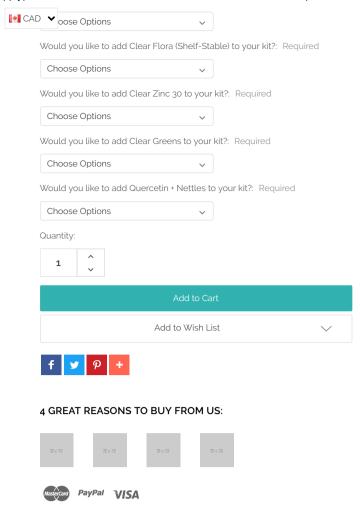
Brand Clear Medicine

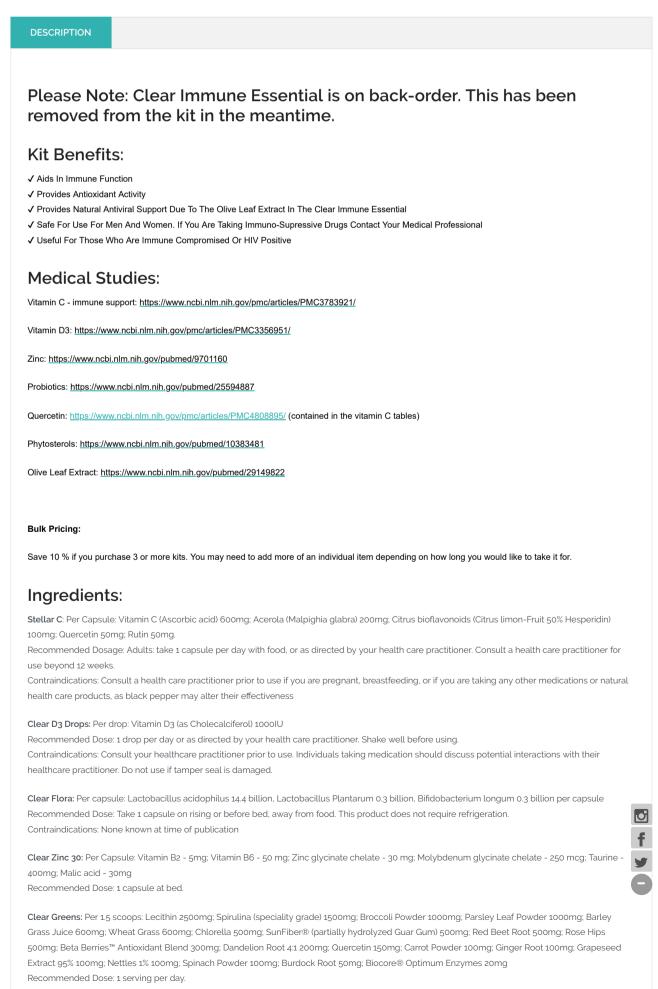
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Would you like to add Clear D3 Drops to your kit?: Required





Contraindications: Consult a health care practitioner prior to use if you 🖭 CAD 🕶 escription medication, as resveratrol may alter the effectiveness of  $these \ medications. \ Consult\ a\ health\ care\ practitioner\ prior\ to\ use\ if\ you\ have\ diabetes,\ a\ gastrointestinal\ lesion/ulcer,\ are\ taking\ an\ anticoagulant/blood$ thinner or anti-inflammatory, or are having surgery. Do not use if you are pregnant or breastfeeding, or if you have celiac disease.

Quercetin + Nettles: Per capsule: Quercetin 200mg; Nettle (Urtica dioica) (1% Silicic acid, 12:1) 200mg

Recommended Dose: Take 3 capsules per day with or without meals, or as directed by your health care practitioner. For use beyond 12 weeks, consult a health care practitioner.

Contraindications: Consult a health care practitioner if symptoms persist or worsen. Do not use if you are pregnant or breastfeeding.

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Clear Detox - Dige **公公公公公(0)** 

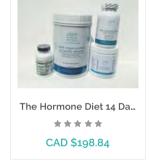






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## TAB L



## **Core Competencies**



#### Introduction

Naturopathic Doctors provide primary and adjunctive health care to people of all ages, focusing on the use of natural therapies to support and stimulate healing processes. Naturopathic Doctors promote health and prevent illness, and diagnose and treat disease in a manner consistent with the body of knowledge and standards of practice for the profession.

The following Core Competencies articulate the knowledge, skill and judgment required of Naturopathic Doctors at entry-to-practice.

#### **Naturopathic Medical Knowledge**

#### **The competent Naturopathic Doctor:**

- 1. Integrates naturopathic philosophy, theory and principles with naturopathic medical knowledge in the care of patients and case management including the assessment, diagnostic and treatment phases.
  - Evaluates and integrates clinical arts and science knowledge within the context of naturopathic principles and philosophy in clinical practice.
  - Formulates diagnoses and treatment plans consistent with naturopathic philosophy and principles.

#### 2. Develops, maintains and respects a comprehensive naturopathic medical knowledge base.

- Demonstrates knowledge of the history and philosophy of Naturopathic Medicine.
- Demonstrates knowledge of the clinical arts and sciences essential to the practice of Naturopathic Medicine
- Demonstrates knowledge of the theory and practice of therapeutics including botanical medicine, homeopathic medicine, traditional Chinese medicine and acupuncture, physical medicine, clinical nutrition, and lifestyle counselling.
- Updates knowledge base continuously through the review of relevant research and ongoing continuing education.

#### 3. Conducts an assessment to formulate a diagnosis.

- Gathers information necessary to formulate a diagnosis.
- Incorporates knowledge of the determinants of health and disease into assessment.
- Formulates diagnoses based on a clinical assessment including but not limited to a medical history, physical examination and diagnostic testing.

#### 4. Critically evaluates medical information.

- Understands, respects and incorporates evidence-based medicine1 in his/her practice.
- Appraises evidence critically to address clinical questions.

- Integrates new information appropriately into clinical reasoning.
- Evaluates and reflects on patient outcomes.

#### **Inter-professional Practice and Collaboration**

#### **The competent Naturopathic Doctor:**

- 1. Develops and maintains relationships with other health care professionals in the care of his/her patients.
  - Demonstrates an understanding of the scope of practice of other health care professionals.
  - Collaborates with others to support health promotion and disease prevention.
  - Utilizes community resources in professional practice.
  - Collaborates with other health care professionals in the care of his/her patients when necessary.

#### Communication

#### **The competent Naturopathic Doctor:**

- 1. Communicates effectively.
  - Articulates information clearly and concisely and in a timely manner, listens actively and responds appropriately.
  - Communicates appropriately with patients or their authorized representatives, colleagues, other health professionals, the community, his/her regulator, and other legal authorities.
  - Requests from and provides to other health care professionals relevant patient information.
  - Advances naturopathic principles and philosophy in communication with patients, health care professionals and the public.
  - Maintains patients confidentiality and privacy.

#### **Patient Care and Health Promotion**

#### **The competent Naturopathic Doctor:**

- 1. Exemplifies the principle of doctor as teacher in patient interactions.
  - Teaches the principles of healthy living and preventative medicine.
  - Educates the patient regarding the etiology and development of disease.
  - Educates the patient about the contributing factors to disease and dysfunction and the ways in which they impact health.
  - Educates the patient about treatment options and their potential risks, benefits, and side effects.

#### 2. Provides safe and effective patient care.

- Provides compassionate, ethical, effective and safe care.
- Utilizes naturopathic therapeutics effectively including botanical medicine, homeopathic medicine, traditional Chinese medicine and acupuncture, physical medicine, clinical nutrition and lifestyle counselling.
- Identifies and assesses the actions of and interactions between drugs, substances and therapies being used by or provided to the patient.
- Communicates a diagnosis.
- Creates, implements, monitors and revises effective individualized treatment plans.
- Documents patient care.

- Refers to other health care professionals when indicated.
- Engages patients in establishing a long-term strategy for their personal health.
- Maintains professional boundaries and refrains from conflicts of interest.
- 3. Promotes the principles and philosophy of Naturopathic Medicine to patients and the community.
  - Promotes naturopathic principles and philosophy.
  - Promotes sustainable health practices.
  - Educates others on the significance of environmental factors on health.
  - Promotes a wider acceptance of Naturopathic Medicine in the health care system.

#### **Practice Management**

#### **The competent Naturopathic Doctor:**

- 1. Establishes, develops and manages his/her practice.
  - Practices in a compassionate, ethical and legal manner.
  - Engages in short and long term business planning.
  - Organizes and manages systems and resources relevant to practice needs.
  - Maintains a safe and secure workplace.
  - Manages time effectively.
  - Recognizes the importance of establishing and maintaining a personal/professional life balance.

#### **Education and Learning**

#### **The competent Naturopathic Doctor:**

- 1. Ensures professional competence through ongoing self-assessment and professional development.
  - Integrates learning into practice.
  - Recognizes limitations in knowledge, skill, judgment and scope of practice.
  - Engages in on-going professional development and learning.
  - Understands the significance of research with respect to predicting health outcomes.
  - References and employs empirical, literary and information-technology sources.
  - Self-assesses professional knowledge and skills regularly.
- 2. Supports the advancement of Naturopathic Medicine through the development, critical assessment and dissemination of research and information.
  - Participates in research activities as appropriate for professional practice.
- 3. Supports the mentorship of students and Members.
  - Participates in mentorship as appropriate.

#### Legislation/Ethics

#### **The competent Naturopathic Doctor:**

- 1. Complies with all relevant laws and regulation.
  - Complies with federal, provincial, and municipal legislation, regulations and bylaws.

• Understands and complies with the *Regulated health Professions Act, Naturopathy Act* and all College regulations and standards of practice.

#### 2. Demonstrates ethical conduct and integrity in professional practice and personal conduct.

- Practices with integrity and without prejudice.
- Abides by the naturopathic oath.
- Demonstrates accountability for practice decisions.
- Places the protection of the public ahead of self-interest.

## TAB M

## Standard of Practice:

### Advertising



The intent of this standard is to advise Members on the appropriate and acceptable methods of advertising that may be used as a part of their practice.

The College supports Members' use of appropriate advertising to communicate the type and availability of services to the public or other health care professionals so that potential and existing patients and referral sources can make choices based on their respective needs.

#### **Definitions**

Advertisement: Any message communicating information about a Member's practice and/or the professional services he/she offers, the content of which he/she controls or influences, directly or indirectly, which is expressed in any language with the intent to influence choice, opinion or behavior and communicated in any public medium to anyone.

Advertising is not the same as providing information to prospective referral sources or sending out health care notices and reminders.

Public Medium: Any form of communication that is, generally speaking, equally available to anyone who chooses to use it and that is directed to the public, or a specific subsection of the public rather than to an individual person or persons. For example radio, television, websites, flyers, and the yellow pages are all forms of public media. Emails targeted to individuals are not an acceptable advertising medium.

#### 1. Advertising

The Member may use any public medium to advertise professional services offered within the scope of practice of Naturopathic Medicine to members of the public, or other health care professionals, to assist them in making informed choices about the health care services provided by Naturopathic Doctors.

The Member's advertisements are accurate, verifiable, comprehensible, professionally appropriate and in compliance with the standards of practice of the profession. The Member is always responsible for advertisements about his or her practice regardless of whether or not the advertisement is made by the individual Member. The Member takes reasonable steps to ensure that advertisements placed by others about his/her services meet these standards.



#### **Performance Indicators**

The Member ensures the information in advertisements is:

- accurate;
- true;
- verifiable by the Member;
- not misleading by either omitting relevant information or including non-relevant information;
- professional;
- comprehensible to its intended audience;
- in accordance with the generally accepted standards of good taste.

References to professional qualifications used in advertisements are consistent with the College's Standard of Practice for Restricted Titles.

Any reference to the cure of symptoms or diseases, or appealing to the public's fears does not meet the standard.

Professional services offered by a Member advertising in her/her capacity as a Naturopathic Doctor are within the scope of practice of Naturopathic Medicine.

Advertisements do not include anything that could be interpreted as intending to promote a demand for unnecessary services.

Reference to fees or prices used in advertisements meet the expectations for truth and accuracy described in this standard. The Member's advertisements may:

- display or distribute a fee schedule and/or explanation of the way fees are calculated;
- provide information about fees or charges in response to a request for this information;
- provide information on the funding models or insurance plans accepted;
- indicate the forms of payment accepted.

The Member ensures that advertisements do not include:

- any information that could be interpreted to be an endorsement by a Naturopathic Doctor including an
  expressed or implied endorsement or recommendation for the exclusive use of a drug, product or brand of
  equipment used in her/her practice;
- a guarantee of the success of the service provided;
- a comparative or superlative statement about service quality, products or people;
- a direct, indirect or implied testimonial by any patient, former patient or other person in respect of the Member's practice
- any references to third-party websites or publications that carry testimonials or endorsements of the Member.

The Member avoids directly or indirectly soliciting patients in person, by telephone, e-mail, or any other means of communication that is not considered to be a public medium. This does not prevent the Member from advertising to the general public or calling/emailing a patient to remind him or her of an upcoming appointment/service. Rather, the Member should not target advertising to individuals or use communication techniques that can pressure potentially vulnerable persons.

#### **Related Standards & Guidelines**

Conflict of Interest Dual Registration

Fees and Billing Restricted Titles College of Naturopaths of Ontario's Guideline on Advertising

#### **Legislative Framework**

<u>Professional Misconduct Regulation</u>

#### **Approval**

Original Approval Date: October 15, 2012 Latest Amendment Date: December 6, 2017

#### Disclaimer

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

## TAB N



#### The College of Naturopaths of Ontario

### Standard of Practice:

### Fees and Billing



The intent of this standard is to advise Members with respect to fees and billing for naturopathic services, drugs, substances, products or devices.

#### **Definitions**

Block Fee: A flat fee charged for a predetermined set of services or unlimited services.

#### 1. Fees and Billing

The Member establishes and maintains fair and ethical fees and billing practices.

#### **Performance Indicators**

#### The Member:

- ensures that a fee schedule is established and posted that outlines:
  - the fees for all visits or services;
  - any administrative fees; and
  - penalties for missed or cancelled appointments.
- ensures that patients are informed of the fees to be charged for naturopathic services;
- ensures that the fees charged:
  - are not excessive in relation to the services proposed;
  - for drugs, substances, products and devices are only marked-up to cover the direct overhead expenses incurred in obtaining, storing, dispensing and selling these items; and
  - are an accurate reflection of the services provided to each patient.
- ensures that any departure from an established or documented fee is consented to by the patient and documented in the patient record;
- provides information to patients that includes:
  - any relevant financial policies and payment expectations;
  - information on fees and the fee schedule specific to the patient circumstances;
  - the basis upon which a bill for services is calculated; and
  - the acceptable methods of payment.
- audits invoices and billing practices at periodic intervals to ensure:
  - the accuracy of invoices;
  - an understanding of the fees that are being charged for their services;



- an understanding of how their registration or billing number is being used; and
- when abnormalities are discovered, reasonable steps are taken to remedy the situation.
- ensures that processes exist for the timely:
  - notification of any balance due or owing; and
  - provision of applicable refunds.
- does not charge a block fee;
- · does not charge a dispensing fee;
- does not offer or give a reduction in fees for prompt payment of services.

#### 2. Receipts

The Member issues a receipt for all payments.

#### **Performance Indicators**

Receipts clearly and legibly record:

- name of treating Member, clinic name, address, telephone number;
- Member's registration number;
- patient's name and address;
- date of service;
- services billed;
- fees for supplements, injectable substances, devices, special testing, etc.;
- payments received;
- balance owing;
- HST registration number, if applicable.

If a replacement receipt is issued it is clearly marked "COPY".

Receipts are clearly itemized. Fees for naturopathic consultation are separated from all other fees. Fees for supplements, injectable substances, devices, special testing, etc., are individually listed, either on the same or another receipt.

The purchase and redemption of vouchers or gift certificates are clearly documented.

#### **Related Standards**

Conflict of Interest
Consent
Dispensing
Prescribing
Recommending Non-Scheduled Substances

Recommending Non-Scheduled Substances Record Keeping

Selling

#### **Legislative Framework**

**Professional Misconduct Regulation** 

#### Disclaimer

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

## TAB O



## Standard of Practice:

### Prescribing



The intent of this standard is to advise Members of the requirements to prescribe drugs and substances listed on Table 3 of the General Regulation safely, ethically and competently.

Prescribing is a component of the controlled act: "Prescribing, dispensing, compounding or selling a drug designated in the regulations." (Regulated Health Professions Act, 1991, S.O. 1991, CHAPTER 18, s. 27).

Members are authorized to prescribe a drug designated in the regulations under *the Naturopathy Act*, 2007, S.O. 2007, CHAPTER 10, Sched. P, s.4.1.

#### **Definitions**

Drug and Substance: For the purposes of this Standard of Practice a drug and/or substance is anything listed on Table 3 of the General Regulation.

#### 1. Competency

The Member has the knowledge, skill and judgment to prescribe drugs or substances safely, ethically and competently.

#### **Performance Indicators**

Prior to prescribing drugs or substances, the Member will:

- achieve and maintain all prerequisites required for performing the procedure including the successful completion of:
  - o a course on prescribing approved by the Council; and
  - o an examination on prescribing administered or approved by the Council;
- fulfill all requirements for maintenance of competence for performing the procedure (e.g., continuing education, College's Quality Assurance Program).

#### 2. Prescribing

The Member conducts an assessment and formulates a working diagnosis based on subjective and/or objective findings, prior to prescribing a drug or substance.



#### **Performance Indicators**

The Member has a Naturopathic Doctor-patient relationship with the patient for whom the drug or substance is being prescribed.

Before prescribing a drug or substance, the Member:

- assesses the patient and conducts laboratory and diagnostic investigations as appropriate;
- determines that the patient's condition warrants prescribing the drug or substance, having considered the risks and benefits and other circumstances relevant to the patient:
- documents symptoms and/or conditions being treated;
- reviews the patient's available medication history.

The Member who prescribes drugs or substances:

- does so in compliance with any limitations and in accordance with the route of administration and dosage specifications included in Table 3 of the General Regulation;
- informs each patient that they have a choice where they can purchase the prescribed drug or substance;
- provides a written prescription;
- provides a verbal prescription in emergency situations only and documents the verbal order as soon as possible;
- documents the drug or substance prescribed in the patient record;
- provides relevant information about drugs or substances, including but not limited to risks, contraindications, and proper usage, to the patient and/or authorized patient representative; and
- notifies the patient's other primary health care providers, if any, of the details of the prescription, with the patient's consent.

When preparing a prescription for a drug or substance, the Member includes the following on the prescription:

- date:
- patient's name and address;
- prescribed drug or substance's name or scientific binomial, strength, dose and quantity to be dispensed;
- directions for use including the administration route, frequency, dose, duration and any special instructions;
- number of allowable refills: and
- prescriber's name, address, telephone number, signature, and College registration number.

After prescribing a drug or substance, the Member:

- monitors and documents the patient's response to the therapy;
- monitors, documents and reports adverse reactions;
- · continues therapy, adjusts dosage or discontinues the therapy as appropriate; and
- consults with an appropriate health care professional when the patient's response to the therapy is other than what the Member anticipated.

When a Member continues a drug or substance initiated by another health care professional, the Member:

- provides ongoing assessment;
- monitors and documents the patient's response to therapy;
- continues therapy, adjusts dosage or discontinues therapy depending on the patient's response;
- informs the initiating health care professional of changes in therapy, where appropriate and with the patient's consent.

#### 3. Record Keeping

The Member makes specific notations regarding prescribing drugs and substances.

#### **Performance Indicators**

In addition to the Standard of Practice for Record Keeping, the Member maintains in the patient record:

- a copy of the prescription;
- a record of any laboratory or other tests that the Member considered in making the decision to prescribe the drug or substance;
- the names and address of the patient's other primary health care providers, the date on which the Member notified those other providers about the prescription and the method by which the notification occurred.

#### **Related Standards & Guidelines**

Compounding
Conflict of Interest
Delegation
Dispensing
Record Keeping
Selling

#### **Legislative Framework**

General Regulation
Naturopathy Act, 2007
Professional Misconduct Regulation
Regulated Health Professions Act, 1991

#### 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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## TAB P

## Standard of Practice:

### Recommending Non-Scheduled Substances



#### Introduction

The intent of this standard is to advise Members, who recommend non-scheduled substances in the provision of Naturopathic care, how to perform the act safely, ethically and competently.

#### **Definitions**

Non-Scheduled Substances: for the purpose of this Standard a non-scheduled substance is anything that is publicly available and is not listed on Table 3 of the General Regulation.

Recommendation: For the purpose of this Standard a recommendation is an advised course of treatment using non-scheduled substances.

#### 1. Competency

The Member has the knowledge, skill and judgment to recommend non-scheduled substances safely, ethically, and competently.

#### **Performance Indicators**

Prior to recommending non-scheduled substances, the Member:

• fulfills all requirements for maintenance of competence for performing the procedure (e.g., continuing education, College's Quality Assurance Program).

#### 2. Recommending Non-Scheduled Substances

The Member conducts an assessment and formulates a working diagnosis based on subjective and/or objective findings, prior to recommending non-scheduled substances.

#### **Performance Indicators**

The Member recommends non-scheduled substances within the context of the doctor-patient relationship.

Before recommending a non-scheduled substance, the Member:

- assesses the patient and conducts laboratory and diagnostic investigations as appropriate;
- · documents symptoms and/or conditions being treated; and
- · reviews the patient's available medication history.

The Member who recommends non-scheduled substances:

· provides a written recommendation except in emergency situations; and

- documents the recommendation in the patient record.
- provides relevant information about non-scheduled substances, including but not limited to risks, contraindications, and proper usage, to the patient and/or authorized patient representative.

When preparing a recommendation for a non-scheduled substance, the Member includes the following:

- date:
- patient's name;
- name of substance/product, strength, dose and quantity to be dispensed;
- directions for use including the administration route, frequency, duration and any special instructions; and
- Member's name, address, signature, and College registration number.

After recommending a non-scheduled substance, the Member:

- monitors and documents the patient's response to the therapy;
- monitors, documents and reports adverse reactions; and
- continues therapy, adjusts dosage or discontinues the therapy as appropriate.

#### **Related Standards & Guidelines**

Communicating a Diagnosis
Conflict of Interest
Prescribing
Record Keeping
Selling
Therapeutic Relationships and Professional Boundaries

#### **Legislative Framework**

General Regulation
Naturopathy Act, 2007
Professional Misconduct Regulation
Regulated Health Professions Act, 1991

#### Disclaimer

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# TAB Q



## Standard of Practice:

### Selling



#### Introduction

The intent of this standard is to advise Members of the requirements to sell substances safely, ethically and competently. This standard applies to the selling of drugs, substances and devices.

Selling scheduled substances is a component of the controlled act: "Prescribing, dispensing, compounding or selling a drug designated in the regulations." (Regulated Health Professions Act, 1991, S.O. 1991, CHAPTER 18, s. 27).

Members are authorized to sell scheduled substances under the *Naturopathy Act*, 2007, S.O. 2007, CHAPTER 10, Sched. P, s. 4.1

#### **Definitions**

Drug: for the purposes of this Standard of Practice, a drug is anything referred to in Table 6 of the General Regulation or anything that is injected.

Substance: For the purposes of this Standard of Practice, a substance is anything that is publicly available and not listed in the General Regulation. This may include botanical tinctures, botanical powders or loose herbs, fluid/solid extracts, base creams, salves and ointments, homeopathic remedies, pharmaceutical grade ethyl alcohol, vitamins, minerals and amino acids.

#### 1. Competency

The Member has the knowledge, skill and judgment to sell drugs, substances and devices safely, ethically and competently.

#### **Performance Indicators**

Prior to selling drugs, the Member is in compliance with the Standard of Practice for Prescribing.

#### 2. Selling Drugs, Substances or Devices

The Member will minimize the risks to patients, self and others that are associated with the selling of drugs, substances or devices.

#### **Performance Indicators**

The Member has a Naturopathic Doctor-patient relationship with the patient, or if no such relationship exists:

- the member possesses the prescription/recommendation from another member for the drug/substance;
- verifies and documents the accuracy and validity of the prescription/recommendation prior to selling the drug or substance; and
- retains a copy of the prescription/recommendation in the Member's records.

The Member only sells a compounded drug or substance directly to their patient.

#### The Member:

- does not sell drugs, substances or devices while being in an unmanaged conflict of interest;
- · sells the drugs, substances or devices for therapeutic purposes only;
- sells the drugs in accordance with any limitations respecting the drugs listed in the General Regulation;
- informs the patient or the patient's authorized representative that they may be able to purchase the drug or substance from a pharmacy;
- is satisfied that the patient:
  - o does not have reasonable or timely access to a pharmacy;
  - o would not otherwise buy the drug;
  - o does not have the financial resources to obtain the drug if not sold by the member; or
  - o the drug is not reasonably available in a pharmacy.
- does not sell a drug if the selling provides a profit or a direct or indirect personal or financial benefit;
- ensures that the drugs, substances and devices sold have been obtained and stored in accordance with applicable laws; and
- ensures that the drug or substance sold has not expired and will not expire before the date on which the patient is expected to take the last of the drug or substance.

The sale of all drugs, substances and devices is documented.

#### **Related Standards & Guidelines**

Compounding
Conflict of Interest
Dispensing
Fees and Billing
Prescribing
Record Keeping

#### **Legislative Framework**

General Regulation
Naturopathy Act, 2007
Professional Misconduct Regulation
Regulated Health Professions Act, 1991

#### 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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## DISCIPLINE COMMITTEE OF THE COLLEGE OF NATUROPATHS OF ONTARIO

## AGREED STATEMENT OF FACTS AND ADMISSION OF PROFESSIONAL MISCONDUCT

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