



College of
Naturopaths
of Ontario



Regulatory Guideline

Workarounds in naturopathic practice

Introduction

Naturopathic practice is governed by professional standards, regulatory requirements, ethical obligations, and evidence-informed expectations designed to protect patients and maintain public trust. Ontario's naturopaths have a broad scope of practice and are authorized to perform seven controlled acts. These include prescribing and administering by injection substances listed in the General Regulation under the Naturopathy Act. Naturopaths are also allowed to accept delegation from other regulated health care providers for the controlled acts that may fall outside their scope.

The Inquiries, Complaints and Reports Committee (ICRC) has seen an increase in complaints related to situations where practitioners develop "workarounds" to overcome legislative limitations. While these actions are often motivated by a desire to meet patient needs or improve access to care, they can create significant professional, legal, and ethical risks.

This article examines several types of workarounds identified in recent ICRC investigations. These examples highlight the importance of understanding and respecting legislative requirements, professional standards, and scope-of-practice limitations. They are intended to help naturopaths make informed decisions that prioritize patient safety, uphold professional integrity, and meet their regulatory obligations.

Accepting delegation from an individual who is not authorized to perform the delegated act

The General Regulation and the [Standard of Practice for Delegation](#) require naturopaths to take reasonable steps to confirm, before accepting the delegation, that the delegator is authorized to perform the controlled act and has the necessary knowledge, skill, and judgment to delegate it appropriately. A health care professional whose registration has been suspended, revoked, or transferred to an inactive category does not have the authority to perform controlled acts and, therefore, cannot delegate them to others.

A naturopath who accepts delegation from an individual who lacks the legal authority to perform the act may result in the procedure being conducted without a valid delegation. This may lead to regulatory and legal consequences. When accepting a delegation, naturopaths should conduct appropriate due diligence and maintain clear documentation.

At a minimum, they should verify and document the delegator's:

- name

- registration number
- discipline
- education and qualifications related to the delegated procedure

Careful verification and documentation help ensure that delegated acts are performed within the legal framework established for regulated health professionals and support the safe, ethical, and accountable delivery of patient care.

Receiving blanket delegations

The ICRC has recently identified several cases in which health care professionals issued blanket delegations of controlled acts to naturopaths for multiple patients. While this approach may appear administratively convenient, it is generally inconsistent with the requirements governing delegation and may compromise accountability and patient safety.

When accepting a delegation, naturopaths must document the following information for each specific patient:

- the date and specific activities that were accepted by delegation
- any applicable conditions
- the period of time that the delegation remains in force

Maintaining patient-specific records helps ensure clarity regarding the authority under which a procedure was performed and supports continuity of care, accountability, and regulatory compliance. Reliance on blanket delegations may create uncertainty about whether the necessary clinical considerations were made for a particular patient and whether the delegation remains valid in the circumstances.

Accepting delegation for injections from a nurse practitioner who had no clinical relationship with the patient

The ICRC has encountered cases in which naturopaths accepted delegation to administer injections from nurse practitioners who had no direct clinical relationship with the patient. Under the Nursing Act, a registered nurse in the extended class may administer a substance by injection or inhalation only in the context of an appropriate nurse-patient relationship. As a result, a nurse practitioner who does not have a nurse-patient relationship with an individual patient may not have the authority to delegate the administration of an injection for that patient.

Before accepting a delegation to administer an injection, naturopaths should take reasonable steps to confirm that the nurse practitioner:

- has an established nurse-patient relationship with the patient
- has the authority to perform the injection for that patient
- has appropriately assessed the patient and determined that the procedure is clinically indicated
- meets all other requirements necessary to delegate the controlled act

If the delegator lacks the authority to perform the act for a particular patient, they cannot validly delegate that authority to another practitioner.



Assuming authority to perform an unauthorized procedure based on membership in a non-regulatory organization

Joining a professional association or organization that brings together health care providers with shared interests can be highly beneficial. Such memberships often provide valuable educational opportunities, facilitate knowledge exchange, and foster professional networking. However, practitioners should be cautious of any organization that suggests its membership expands a member's legal scope of practice. Membership in a professional association does not grant authority to perform procedures that fall outside a practitioner's legislated scope of practice.

In Ontario, a health care practitioner's scope of practice is established by the Regulated Health Professions Act, 1991, the Naturopathy Act, 2007, and the regulations made under those statutes. Only authorized and regulated health care professionals may perform controlled acts, such as prescribing drugs, administering substances by injection or inhalation, or communicating diagnoses.

Regulatory colleges are responsible for ensuring that practitioners comply with the requirements set out in the applicable legislation and regulations. Membership in any other organization, regardless of its mandate, reputation, or location, cannot confer authority to perform controlled acts in Ontario. Practitioners must ensure that their activities remain within the scope of practice authorized by law and by their regulatory college.

Performing a delegated procedure without the requisite knowledge to do so

The Standard of Practice for Delegation states that before performing a delegated controlled act, a naturopath must ensure that they have the knowledge, skill, and judgment to perform the controlled act safely, competently, and ethically. If a complaint is filed in relation to a delegated procedure, the naturopath may be required to demonstrate how they acquired the competence to perform the procedure. This may include providing evidence of relevant education, training, supervision, or other learning activities. Practitioners should exercise careful professional judgment when selecting educational programs and instructors, ensuring that training is obtained from credible, qualified, and appropriately authorized sources.

The College has recently become aware that a former physician, whose certificate of registration was revoked several years ago following disciplinary proceedings before the College of Physicians and Surgeons of Ontario, has been offering training to naturopaths in procedures that fall outside their scope of practice. Even if naturopaths intend to receive delegation in the future from an authorized regulated practitioner, obtaining training from a person who has lost the authority to provide the services in question raises significant ethical and patient-safety concerns. Naturopaths should exercise caution and professional judgment when considering such training.

Billing a patient for services provided by another practitioner

Under the [Standard of Practice for Fees and Billing](#), naturopaths are expected to maintain fair, transparent, and ethical billing practices. Patients should be able to clearly identify who provided their care and what services they received.

When issuing a receipt, ensure that it accurately reflects the name of the treating practitioner and the services that were provided. If a service or procedure is performed by another practitioner or staff member, it should not be billed under the naturopath's name.



For example, if a procedure has been delegated to a staff member, the naturopath cannot submit or issue a receipt suggesting that they personally performed the service. Misrepresenting the provider of care may create confusion for patients and insurers and could result in reimbursement claims being made for services that were not actually provided by a naturopath.

In many cases, practitioners may view a workaround as a practical solution to a frustrating obstacle. However, bypassing established rules can blur professional boundaries, create uncertainty about accountability, and expose both patients and practitioners to unnecessary risk. A workaround that appears efficient in the short term may ultimately result in complaints, regulatory investigations, or disciplinary proceedings that may lead to revocation of the certificate of registration.

Health care regulation is designed to protect the public by establishing clear scopes of practice, standards of care, and accountability mechanisms. When practitioners attempt to circumvent these requirements - whether by relying on informal arrangements, stretching the interpretation of legal authorities, or finding alternative pathways to perform activities that are otherwise restricted - they risk compromising patient safety and undermining public confidence in the profession.

Resources:

[Naturopathy Act, 2007](#)

[Regulated Health Professions Act, 1991](#)

[General Regulation](#)

[Standard of Practice for Delegation](#)

[Standard of Practice for Fees and Billing](#)

