



COLLEGE OF
NATUROPATHIC PHYSICIANS
OF BRITISH COLUMBIA

Re: *Delegation of restricted activities to non-registrants*

On December 14, 2018, the Ministry of Health’s professional regulation division (<https://www2.gov.bc.ca/gov/content/health/practitioner-professional-resources/professional-regulation/scope-of-practice-reform>) confirmed that a registered health professional may only delegate a restricted activity to a person who is authorized to perform that restricted activity under the *Health Professions Act*, unless the bylaws of his or her regulatory body provide otherwise. Specifically, the Ministry website states that:

delegation of restricted activities to non-registrants (including unregulated persons) must be authorized in bylaw by the health profession college whose registrants have been granted authority to perform the restricted activity, before such a delegation may take place.

What does this mean for naturopathic doctors in BC?

There is no provision for the delegation of restricted activities to unlicensed individuals in the College’s bylaws. Restricted activities that naturopathic doctors may perform are listed in [section 5 of the *Naturopathic Physicians Regulation*](#), and include the placement of IV needles, mixing of IV bags, and administration of intramuscular injections, for example. There are other health professionals who are authorized to perform these restricted activities under the *Health Professions Act*. It is *unlawful* for a naturopathic doctor to delegate restricted activities to individuals who do not have the statutory authority to perform those restricted activities.

In the event that a complaint is received by the College regarding delegation of a restricted activity by a naturopathic doctor to a person without the statutory authority to perform that restricted activity, the College will proceed on the basis that a naturopathic doctor is not permitted to delegate restricted activities to such a person.

What is the College doing regarding Naturopathic Students?

The College is working with Ministry on a bylaw amendment providing for a “Naturopathic Student” category of registration, with the intent of enabling naturopathic students to perform some restricted activities under the direct supervision of a naturopathic doctor.

Registrants with related questions are invited to make an appointment to speak with Phillipa Stanaway, Registrar, by contacting Danielle Hill, Executive Assistant at dhill@cnpbc.bc.ca or 604-688-8236.