



July 31, 2020

OAND Engagement with CONO on the Telemedicine Guideline

In June, CONO proposed new Guideline for Telemedicine and posted this for public comment. The OAND provided detailed feedback. In fact, the OAND submission was the only one that CONO received. There were three key areas that we expressed concern about, as follows:

1. The CONO proposal stated that the patient records and billing receipts would have to note that the visit was performed via telepractice. We argued that the requirement to identify telepractice on billing receipts was an unnecessary burden that offered no additional protection to the patient or the general public and in fact could cause confusion with insurance claims.

CONO agreed and removed the requirement that telemedicine had to be identified in the billing receipts.

2. We also argued that we understood the rationale for NDs being regulated in the province where they were treating patients, but that short duration travel should be exempt. We argued that it was more patient protective if their condition changed or they have an issue with their medication. That they should be able to talk to their “home Naturopath” who knows the patient and has their records, instead of a new ND on their trip.

CONO agreed with the rationale, but unfortunately could not change this as it was a legal restriction, not one imposed by CONO or their QAC Committee. They stated that “As health care is regulated on a provincial level, individuals who wish to treat patients in another jurisdiction must be registered with the appropriate regulatory body of that province.”

3. We also suggested that CONO, other Colleges and the Ministry play a greater role in the determination of which of the many Tele/Video Conferencing providers were health privacy compliant, to aid NDs and other practitioners with their virtual care choices.

CONO agreed that such a list of providers would be helpful, but they did not see this as their role and rather “encouraged” the OAND and other member organizations to assist Members in selecting credible providers, which we will continue to do.

We still feel strongly that if your patient is travelling, there should be provisions for continuity of care wherever they may be, but it is possible that Canadian health laws won't allow changes to this for any type of practitioner. OAND will continue to investigate our advocacy options with this, but otherwise we think this was a successful engagement on OAND Members' behalf.

The new Guideline is posted on the CONO website.