

[View this email in your browser](#)

Enlighten

News from the CNPBC



January 2022

Can NDs write COVID-19 Vaccine Exemption and Deferral Letters?

The College has received several inquiries regarding the ability of NDs to issue COVID-19 vaccine exemptions and deferral letters to patients.

Under section 43 of the Public Health Act, a person who is subject to an Order of the Provincial Health Officer (PHO) can submit a request for reconsideration (exemption) from an Order's requirements. In BC, as per the PHO, only physicians licensed and registered with the College of Physicians and Surgeons of BC (CPSBC) and Nurse Practitioners licensed and registered with the BC College of Nurses and Midwives (BCCNM) can issue vaccine exemptions and deferrals.

CNPBC registrants cannot issue exemptions or deferrals for the COVID-19 vaccine.

Requests for exemptions require the completion of a [medical deferral form](#) completed by one of the above-mentioned practitioners and submitted to the PHO. For more details on what constitutes an exemption and further details regarding the process please refer to the [COVID-19 Public guidelines request reconsideration exemption process](#) from the BCCDC and BC Ministry of Health.



Reminder Regarding Delegation and IV Treatments

It has come to the attention of the College that some registrants may be employing "IV technicians" or other unregulated persons to perform IV insertion. Additional activities such as the administration or compounding of drugs to be administered by IV, and other tasks

The Ministry of Health 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.

See full text here: <https://www2.gov.bc.ca/gov/content/health/practitioner-professional-resources/professionalregulation/scope-of-practice-reform>

What is a restricted activity?

Restricted activities within the scope of practice for naturopathic doctors can be found at section 5 of the Naturopathic Physicians Regulation. Examples of restricted activities in section 5 include administering a substance by injection, enteral instillation or parenteral instillation, putting an instrument or device into an artificial opening in the body, and compounding, dispensing or administering a drug.

This means that placement of IV needles, mixing of IV bags, and administration of drugs in any form, including intramuscular injection, are restricted activities.

What does this mean for naturopathic doctors in BC?

There is no provision for the delegation of restricted activities to unregulated persons in the College's Bylaws. It is unlawful for a naturopathic doctor in BC to delegate these activities to an IV technician or other unregulated person. If a naturopathic doctor wishes to hire someone to assist with IVs or any other restricted activity, it is their responsibility to ensure that the person they hire is a regulated health professional who is authorized to perform those activities under the *Health Professions Act*.

If the College receives a complaint or is otherwise notified of unlawful delegation of a restricted activity by a registrant, the matter will be referred to the Inquiry Committee for investigation.

A Note From the Registrar

As we enter 2022 we know that change will be a constant in our lives for the foreseeable future. We also know that health professionals and their role in the community has never been more important or appreciated.

So many of you have written or sent emails over the last few months with thoughts and suggestions. Thank you for taking the time to be in touch. I have read and I appreciate

The College will continue with these monthly updates with the intention of not inundating you with correspondence.

Be well.

Carina Herman



Copyright © 2022 College of Naturopathic Physicians of British Columbia, All rights reserved.

Our mailing address is:

College of Naturopathic Physicians of British Columbia
605 Robson Street
Suite 840
Vancouver, BC V6B 5J3

You are receiving this email because you are either a registrant of CNPBC or you signed up to receive emails from us. CNPBC is legally required to deliver notices about naturopathic practice and professional regulation to its registrants. If you are a retired naturopathic doctor or if you are not a registrant and no longer wish to receive emails from us, you may [unsubscribe from this list](#).