



# Online Dispensaries

Naturopathic doctors who choose to refer patients to online dispensaries such as [Fullscript](#) must ensure that they meet their professional obligations when they do so.

## Doctor-patient relationship

A clear naturopathic doctor-patient relationship must be established before a naturopathic doctor may sell products to an individual through an online dispensary. A naturopathic doctor, representing themselves as a naturopathic doctor, must not sell a product or products to a member of the public through an online dispensary in the absence of a clearly established doctor-patient relationship.

## Referral fees and fee-splitting

Under section 8(g) of the [Code of Conduct](#), it is professional misconduct for a naturopathic doctor to: share fees with a person who has referred a patient or receive fees from any person to whom a registrant has referred a patient, or request or accept a rebate or commission for the referral of a patient. Under section 8(h), it is misconduct to permit any person to share in fees for professional services, other than a partner, employee, associate in a professional firm or corporation, professional subcontractor or consultant authorized to practice medicine, or a legally authorized trainee practicing under the supervision of a naturopathic medicine registrant.

## Privacy and confidentiality

Naturopathic doctors have a duty to maintain the confidentiality of information about their patients. Confidentiality must be addressed in the contract between the naturopathic doctor and an online dispensary. Patients must be made aware of the relationship between an online dispensary and their naturopathic doctor. Naturopathic doctors be cognizant of and recognize the volume and specific types of information collected by online dispensaries, and avoid unnecessary or improper disclosure.

## Product safety

Naturopathic doctors must ensure that products they recommend are safe for patient use. In-clinic dispensaries may afford better opportunities for continuous oversight and quality control. Even if a naturopathic doctor is able to confirm the source and quality of products offered through an online dispensary at a point in time, they should ensure that they are informed of any changes in the quality of products or product sourcing.

## Insurance coverage

Use of online dispensaries may give rise to new malpractice issues that may not be covered by existing insurance contracts. Events such as inadvertent disclosure of private information about patients by a third party and dosage errors may arise as results of errors made by an online dispensary in filling an order made jointly by a naturopathic doctor and patient. Naturopathic doctors must ensure that they have appropriate insurance coverage before referring patients to online dispensaries.

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