

College of Homeopaths of Ontario

Public-Interest Submission Regarding Bill C-218

Regulating homeopathy in Ontario in the public interest.

Executive Summary and Position Statement

From a public protection perspective, the College supports the objectives of Bill C-218 and the principle that individuals whose sole underlying condition is a mental disorder should have meaningful opportunities to access healthcare services, community supports, and referral pathways before an irreversible decision is made.

The College does not suggest that homeopaths assess, diagnose, or treat serious mental illness beyond their legislated scope of practice or professional competence.

Homeopaths, like all regulated health professionals, have a responsibility to recognize when a patient's needs exceed their scope of practice and to facilitate appropriate referrals to qualified healthcare providers, crisis services, community supports, or emergency resources.

The College believes public protection is enhanced when individuals are aware of and able to access the broad range of healthcare, social, community, and support services available within Ontario's healthcare system.

Scope of Submission

The College's comments are limited to matters relating to public protection, professional scope of practice, access to healthcare services, referral responsibilities, and connections to community supports. These comments should not be interpreted as expressing a position on the broader legal, ethical, religious, philosophical, or political debates surrounding Medical Assistance in Dying (MAID). Rather, the College's interest is confined to ensuring that individuals experiencing significant mental health challenges are aware of and have meaningful opportunities to access appropriate healthcare services, community resources, and referral pathways in the public interest.

Submitted by:

Basil Ziv

Registrar & CEO

College of Homeopaths of Ontario

Re: Bill C-218, An Act to Amend the Criminal Code (Medical Assistance in Dying)

The College of Homeopaths of Ontario respectfully submits the following public-interest comments regarding Bill C-218. The Bill proposes to amend the Criminal Code so that a mental disorder would not constitute a grievous and irremediable medical condition for the purposes of eligibility for Medical Assistance in Dying (MAID) where it is the sole underlying condition.

As Ontario's regulator of the homeopathy profession, the College's mandate is to regulate the profession in the public interest and to promote safe, ethical, and competent practice. The College's comments are offered from a public protection perspective and focus on the importance of ensuring that individuals experiencing significant mental health challenges have meaningful access to healthcare services, social supports, community resources, and appropriate referral pathways before an irreversible decision is made.

The College recognizes that individuals whose sole underlying medical condition is a mental disorder may experience profound suffering and face complex personal and healthcare circumstances. Given the irreversible nature of MAID, the College believes it is important that such individuals have meaningful opportunities to access available healthcare services, community supports, and referral pathways before an irreversible decision is undertaken.

Ontario's healthcare system includes 26 regulated health professions, each contributing within its legislated scope of practice, professional competencies, and areas of expertise. Collectively, these professions form part of a broader healthcare system intended to support the diverse needs of Ontarians.

Individuals experiencing mental health challenges may access assistance from a range of healthcare professionals, community organizations, social supports, crisis services, housing supports, peer-support networks, and other resources. Public protection is enhanced when individuals are aware of available healthcare options, community supports, and referral pathways that may assist them in addressing their circumstances.

Access to multiple forms of care and support may help alleviate suffering, improve quality of life, strengthen coping capacity, enhance resilience, and ensure that individuals are aware of available healthcare and community services. Ensuring that individuals have meaningful opportunities to learn about, access, and consider available supports is consistent with a patient-centred approach to care and with broader public protection objectives.

Role of Homeopaths and Referral Responsibilities

The College does not suggest that homeopaths assess, diagnose, or treat serious mental illness beyond their legislated scope of practice or professional competence.

Rather, homeopaths, like all regulated health professionals, have a responsibility to recognize circumstances in which a patient's needs exceed their scope of practice, expertise,

or available resources and to facilitate timely referral to appropriate healthcare providers, services, or emergency resources.

Homeopaths may encounter patients experiencing distress, grief, anxiety, depression, social isolation, or other life challenges. In such circumstances, practitioners are expected to provide care only within their professional competencies and to facilitate referrals where additional assessment, diagnosis, treatment, crisis intervention, psychiatric care, or other services are required.

Homeopaths may also assist patients in accessing relevant healthcare, social, community, housing, crisis, and peer-support services where appropriate. Assisting patients in identifying and connecting with available supports can help promote continuity of care and improve access to services.

The College believes that coordinated care, interprofessional collaboration, and appropriate referral practices contribute significantly to patient well-being and public protection. Individuals facing significant mental health challenges may benefit from access to a broad continuum of services and supports provided by qualified professionals and community organizations.

Conclusion

The College of Homeopaths of Ontario believes that individuals experiencing significant mental health challenges should have meaningful opportunities to access healthcare services, community supports, and appropriate referral pathways before an irreversible decision is made.

Ontario's regulated health professionals each contribute within their respective scopes of practice and competencies and play an important role in facilitating access to appropriate care when referral or collaboration is required.

From a public protection perspective, the College supports the objectives of Bill C-218 because they reflect the importance of ensuring that individuals whose sole underlying condition is a mental disorder have meaningful opportunities to access available healthcare services, community supports, and referral pathways before an irreversible decision is made.

The College respectfully encourages Parliament to consider the importance of healthcare access, community supports, interprofessional collaboration, and appropriate referral pathways when deliberating Bill C-218.

Thank you for considering the College's comments.

Respectfully submitted,

Basil Ziv

Registrar & CEO
College of Homeopaths of Ontario

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