



Establishing a Supervision Agreement with an MD or DO for Prescribing Medications

This handout is intended to help you establish a supervision agreement with an MD or DO. Although the CNDA is working on legislation that would eliminate the need for supervision relationships, passing legislation is a multi-year process. If you'd like to prescribe medication to your patients, the CNDA strongly encourages establishing a supervisory relationship.

Establishing a supervisory relationship with an MD or DO can sometimes, but not always, take a fair amount of legwork. We recommend identifying potential supervisors using the following strategies:

1. Ask your colleagues. The MD/DO does not need to be in your area.
2. Look up integrative clinics in your area and elsewhere.
3. Use the following three resources to locate like-minded MDs or DOs:
 - American College for the Advancement of Medicine (ACAM) www.acam.org Find a Doctor
 - Osteopathic Physicians and Surgeons of California www.opsc.org Find a DO
4. Ask your colleagues' supervising MDs/DOs if they have any recommendations – definitely check with your colleague about this first to make sure that is an appropriate ask!
5. Start contacting local MDs/DOs in your area (see below).

If you have no luck with steps 1 through 4, we recommend sending out letters to as many doctors in your area as you can then follow up with them by phone. MDs or DOs working in integrative clinics are a good place to start – they may be familiar with naturopathic medicine and more likely to supervise you – but don't limit your search to those doctors.

For the introductory letters, gear them toward professionals and include examples of conditions that you typically treat and would like to be able to prescribe medication to treat. You can also include the documents on the CNDA's Supervising Agreement webpage (<http://www.calnd.org/supervision>), which compare naturopathic training with conventional training, describe the primary care services you are licensed to perform in CA, and compare the prescribing rights of NDs in licensed states. Follow up by phone after the letter has been delivered, and ask to set an in-person appointment to further explain your qualifications, education, licensure, and why you would like a supervising doctor.

At the appointment, bring the CNDA handouts and your CV, and be prepared to discuss your education and treatment protocols. It's also helpful to let them know you can act as a resource - many MDs/DOs are moving in the direction of integrative medicine and natural treatment, but lack training and expertise. You can provide that, plus be a source of referrals (and they can refer to you as well).

Another strategy is to keep an eye on the MDs or DOs that your patients are currently seeing. Sending that doctor a report (if the patient is ok with that) can be a good way to open the door to a potential supervisor. Then send them an introductory letter and follow the steps above. You can also participate in grand rounds at nearby hospitals to make connections with potential supervisors.

Many MDs or DOs are completely unfamiliar with naturopathic medicine, and simply don't know about the training you go through to become a licensed doctor. Getting your foot in the door is a big step to securing a supervising relationship!

Barriers to protocols

1. MD/DO finds out that his/her malpractice insurance will be increased

Possible solutions:

- A. ND offers to subsidize the increase for the MD/DO
- B. Remind the MD/DO that you can be a source of referrals and information

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2. MD/DO finds out the his/her malpractice insurance won't cover supervision of ND

Possible solution:

- A. This is actually ok as long as the ND is covered by malpractice insurance. Contact your malpractice provider for information on getting a rider for your supervisory relationship.

What needs to be in a protocol?

A protocol is the written agreement between an MD or DO and an ND that allows the ND to prescribe all legend drugs and Schedule 3-5 controlled substances. NDs in California can independently prescribe ALL natural and synthetic hormones (including scheduled drugs) and injectable nutraceuticals. A DEA number is necessary to prescribe any scheduled hormones.

The following information needs to be in a protocol developed between an MD and ND under SB 907 (the Naturopathic Practice Act):

1. The protocol is approved by the MD/DO and the ND
2. Name of ND who will furnish* or order drugs
3. Which drugs may be furnished or ordered (can be categories or specific names)
4. When Schedule 3 controlled substances are furnished, they should be furnished according to a patient-specific protocol approved by the supervising MD/DO and provided, upon request, to the pharmacist who dispenses the drugs.
 - This means you need to document an interaction with your supervising MD/DO (phone call, email, conversation if they are in your office) in the patient's chart when prescribing, adjusting, etc. a schedule 3 controlled substance.
5. Under what circumstances drugs can be furnished or ordered
6. The extent of MD/DO supervision
7. The method of periodic review of the ND(s) competence (in ordering drugs), including peer review and the review of the provisions of the protocol

Additional Requirements/ options

1. One MD/DO may not supervise more than 4 NDs
2. The MD/DO need not be present in the same location, but should be available by telephone at the time of patient examination by the ND (keep the same hours)

Definitions

*Furnishing includes both (1) ordering a drug according to protocol and (2) transmitting an order of the supervising physician.

For a downloadable version of the CNDA's sample supervisory agreement, visit <http://www.calnd.org/supervision> (you will need to be logged into your CNDA membership account).

Comments, questions or feedback? Contact the CNDA at coordinator@calnd.org or 310-670-8100.