

Advertising, Education, and Collaborative Care

Regulatory Considerations for ONIN Members

This document is intended to support ONIN members in navigating public-facing communications (including websites, social media, and newsletters) where care may involve **collaborative models**, **off-label use**, or **compounded substances**. It summarizes how regulators distinguish between **permitted education** and **advertising**, and where regulatory risk most commonly arises.

This document is provided for general informational purposes only and does not constitute legal, regulatory, or marketing advice. ONIN does not approve or endorse individual advertising content or clinical practices.

Health Canada: Education vs Advertising of Compounded or Off-Label Therapies

Health Canada draws a strict distinction between **general education** and **advertising** of health products or therapies. This distinction applies regardless of profession, scope, or who delivers the therapy.

Key Considerations

Health Canada may consider public-facing content to be **advertising** when it:

- Links a **specific substance** (particularly compounded or off-label) to the **treatment of symptoms or conditions**
- Suggests a clinic **offers, provides, or makes available** a therapy for therapeutic outcomes
- Creates an impression of **therapeutic benefit tied to access or availability**

This applies to:

- Clinic websites
- Social media platforms (Instagram, Facebook, TikTok, etc.)
- Blogs, newsletters, and other digital communications

Importantly:

- These considerations apply **regardless of who is delivering the therapy** (ND, MD, NP, delegated provider, or other practitioner).
- Compounded substances are **not authorized products**, and public promotion of their therapeutic use is subject to heightened scrutiny.

Lower-Risk Public Content

Public content is generally lower risk when it remains clearly educational, such as:

- Discussion of scientific mechanisms
- Review of published evidence or areas of research
- General context about emerging or investigational therapies
- Clear acknowledgement of limitations or uncertainty



College of Naturopaths of Ontario (CONO): Advertising and Apparent Scope

CONO treats **all public-facing content** as advertising, including social media. Advertising must be accurate, verifiable, and not misleading to a reasonable member of the public.

Key Considerations

Regulatory concerns may arise where public content:

- Could reasonably be interpreted as an ND **offering or delivering therapies outside naturopathic scope**
- Implies **clinical authority, delivery, or indication** for therapies that require collaboration, delegation, or referral
- Suggests **expected outcomes or benefits** without appropriate regulatory context

Important context:

- Regulators assess how content would be interpreted by the **public**, not how it is intended by clinicians.
- Even where care is appropriately delivered through collaborative models, **advertising language** can still create apparent scope concerns.

Collaborative Care: Where Advertising Risk Commonly Appears

Describing **collaborative or integrative care models** at a high level is generally acceptable.

Risk increases when public messaging:

- Moves from describing **care structure** to naming **specific therapies**
- Combines therapy names with:
 - symptom relief
 - clinical indication
 - expected outcomes
 - service availability

A useful distinction: **Education explains concepts. Advertising promotes services.**

Higher Risk Public Facing Content

Some types of public-facing content carry higher regulatory risk, particularly when multiple elements appear together. Members may wish to exercise additional caution where public communications include:

- Naming a **compounded substance**
- Naming a therapy that is **outside** naturopathic scope
- **Linking** a therapy to **specific** symptoms, conditions, or outcomes
- Language suggesting a clinic offers, provides, or delivers a therapy that is outside naturopathic scope, even where care is appropriately coordinated through collaboration, delegation, or referral
- Statements implying clinical indication, appropriateness, or eligibility
- References to availability, access pathways, or booking
- Claims or implications of effectiveness, restoration, or benefit
- Content that could reasonably be read as describing services, rather than general education
- Standalone posts that rely on context from other content to avoid misinterpretation



Why This Matters

- Health Canada and CONO investigations are often triggered by **complaints**, not intent.
- Social media content is frequently reviewed **out of context**.
- Clinicians have faced investigations based solely on advertising language, even where clinical care itself was appropriate.

ONIN Support

ONIN is committed to supporting members through:

- Guidance on advertising and collaborative care
- Education sessions addressing regulatory expectations
- Resources to help navigate non-intuitive regulatory boundaries

Members are encouraged to seek clarification early where uncertainty exists.

References & Regulatory Sources

Health Canada

Regulatory Requirements for Advertising

<https://www.canada.ca/en/health-canada/services/drugs-health-products/regulatory-requirements-advertising.html>

Policy: The Distinction Between Advertising and Other Activities

<https://www.canada.ca/en/health-canada/services/drugs-health-products/regulatory-requirements-advertising/policies-guidance-documents/policy-distinction-between-advertising-activities.html>

College of Naturopaths of Ontario (CONO)

Standard of Practice: Advertising

<https://www.collegeofnaturopaths.on.ca/resource-library/standard-advertising/>

Advertising, Websites and Social Media – Guidance

<https://www.collegeofnaturopaths.on.ca/resource-library/advertising-websites-and-social-media/>

Advertising Guideline

<https://www.collegeofnaturopaths.on.ca/resource-library/advertising-guideline/>

Disclaimer

These requirements are often **counterintuitive**, particularly for clinicians working in advanced or collaborative care environments. This resource is intended to support **risk awareness and professional protection**, not to limit appropriate, evidence-informed clinical care.

This Resource is intended to support general understanding of publicly available regulatory guidance from Health Canada and the College of Naturopaths of Ontario (CONO). This document **does not constitute legal advice, regulatory advice, marketing advice, or approval of any specific advertising content or clinical practice**.

ONIN does not review, approve, or endorse individual member communications, advertising materials, or social media content. Responsibility for ensuring compliance with all applicable legislation, regulations, standards of practice, and professional obligations rests solely with the individual registrant. Members are encouraged to consult directly with their regulator, legal counsel, or qualified regulatory advisors where clarification or formal advice is required.