

Dear Dr. Beverly Huang,  
President of the College of Naturopathic Doctors of Alberta (CNDA)

March 28, 2016

We are a group of Canadian physicians and surgeons who have been watching the trial of Collet and David Stephan over the past few weeks, and while we are moved by the senseless tragedy of Ezekiel's death, we are also deeply concerned about the conduct of the registered naturopath involved in his care. We are writing in the hopes that the CNDA can reassure us and the general public that they are acting in accordance with their provincial mandate as the regulating body of the naturopathic profession in Alberta.

According to its website the CNDA serves to “administer standards of practice and professional conduct” amongst the registered naturopaths of Alberta. Self-regulation has been a privilege granted to Albertan naturopaths since 2012. The CNDA thus performs a vital role in protecting the public by establishing the standard of care its members must adhere to. Members found to be working below the standard of care must be prevented from continuing to do so via disciplinary action. This can be accomplished by suspending or withdrawing practice privileges, re-examining educational certifications or requiring the deficient member to undergo remediation. As MDs we are subject to the regulation of our respective provincial colleges and know that should our work fall below the standard of care, our regulatory college will discipline us in order to safeguard the public.

On its website the CNDA describes the process of becoming a registered naturopath in Alberta. This requires 4 years of schooling, involving “clinical medical sciences” and “clinical training”. Naturopathic students “study the same basic medical and clinical sciences as other healthcare professionals, such as MDs, DCs, DDSs and RNs.” By the end of their training students are expected to have “proficiency in assessment, diagnosis, treatment and follow-up evaluation.” This constitutes the professional and clinical skill set that Albertan naturopaths are expected to have as overseen and regulated by the CNDA.

As the trial of Collet and David Stephan has progressed, the name of the registered naturopath who was involved in his care before his tragic and untimely death has been revealed to the public. Tracey Tannis of the Lethbridge Naturopathic Medical Clinic is listed on the CNDA website as a member in good standing. There is no indication as far as the general public is concerned that the CNDA has investigated her conduct or applied any disciplinary measures after the events that led to Ezekiel's death.

By any objective measure of a healthcare professional licensed to care for children Dr. Tannis did not meet the standard of care. According to what has been given as evidence in the Stephan trial, Dr. Tannis did not physically examine Ezekiel, who was so stiff from meningeal inflammation that he could not sit in his car seat when his parents took him to the Lethbridge Naturopathic Medical Clinic. Dr. Tannis has stated that she did not communicate with Collet Stephan, yet two other people have given statements that Dr. Tannis did in fact discuss viral meningitis with Collet, and gave her echinacea anyway. At no point did Dr. Tannis advise Collet that a lumbar puncture (typically performed by an emergency or pediatric physician) is the only way to distinguish between viral and bacterial meningitis. It's unclear if Dr. Tannis is aware that bacterial meningitis is fatal if not treated with antibiotics and can cause permanent brain damage if treatment is not initiated promptly.

Regardless of how much *direct* communication occurred between the Stephans and Dr. Tannis, they left the Lethbridge Naturopathic Medical Clinic with an echinacea tincture they felt had been recommended by a registered naturopath. Dr. Tannis has stated that she was aware a woman was in her

clinic that day requesting a treatment for a child under the age of 2. She was involved in some way in the sale of this medication yet never examined the child it was intended for. It is up to the CNDA to determine to what degree Dr. Tannis engaged with the Stephans about their very sick toddler, and to what extent she was aware that they thought he had viral meningitis. She has stated in court that the Stephans simply purchased an over the counter herbal remedy, yet they chose to go to a naturopathic clinic to make this purchase. If patients are drawn to buying treatments from a clinic rather than a health food store it is because they have a greater sense of security in doing so. That security comes with an attendant responsibility on the part of the clinic.

**The degree of responsibility that Dr. Tannis bears for the tragic outcome Ezekiel Stephan suffered is a matter for the CNDA to explore and publicly address.**

Albertans should expect that any regulated healthcare professional meeting the standard of care for treating children would have basic knowledge about meningitis. Albertans should also expect that any regulated health professional using the designation “Dr.” would not recommend a treatment for a child without first physically examining them in order to arrive at a diagnosis. If Dr. Tannis continues to practice as a registered naturopath, it is incumbent upon the CNDA to reassure Albertans that they have adequately investigated this case and are satisfied that her clinical judgment is sound.

The CNDA also needs to decide whether or not it is appropriate for a naturopath to sell treatments out of their own clinic. A medical doctor selling medication directly to the public in this way would be expected to bear responsibility for a poor patient outcome, and the expectation should not be any different for a naturopath.

With the privilege of self-regulation comes the enormous responsibility of ensuring that every registered naturopath meets the standard of care required to ensure the safety of the general public. It behooves the CNDA to tell Albertans how it plans to ensure that Dr. Tannis (who remains a member in good standing) does not injure another patient in the future. We also expect the CNDA to address the issue of a naturopath's responsibility for treatments that are sold directly out of their own clinics.

We, the undersigned physicians and surgeons of Canada look forward to hearing the CNDA's response to these critical issues of patient safety.

Regards,

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