

**SUMMARY of the Decision of the Inquiries, Complaints and Reports Committee  
(the Committee)**  
(Information is available about the complaints process [here](#) and about the Committee [here](#))

**Dr. Clifford Rosen (CPSO #85938)  
(the Respondent)**

## **INTRODUCTION**

The College received information raising concerns about the Respondent's prescribing of ivermectin. Subsequently, the Committee approved the Registrar's appointment of investigators to conduct a broad review of the Respondent's practice.

## **COMMITTEE'S DECISION**

The Committee considered this matter at its meeting of February 27, 2023. The Committee required the Respondent to appear before a Panel of the Committee to be cautioned with respect to following the College and Public Health guidelines in a pandemic, to follow the College's *Medical Records Management* policy and to practice within his approved scope of practice. The Committee also accepted an undertaking from the Respondent that is now posted on the public register.

## **COMMITTEE'S ANALYSIS**

The College received a report from an investigative firm, advising that one of their investigators had accessed the Canadian Covid Telehealth Services and received a prescription for ivermectin from the Respondent.

On October 19, 2021, Health Canada issued an update to its public advisory against the use of ivermectin to prevent or treat COVID-19. The advisory stated the following:

- There was no evidence that ivermectin worked to prevent or treat COVID-19, and it was not authorized for this use.
- To date, Health Canada had not received any drug submission or applications for clinical trials for ivermectin for the prevention or treatment of COVID-19.
- Health Canada had recently become aware that ivermectin had been advertised in Canada for the treatment of COVID-19.
- It is illegal to sell or advertise a drug in a false, misleading or deceptive manner. The Department had taken action and directed advertisers to remove the non-compliant advertisements.

The Respondent's certificate of registration states that the Respondent "may practice independently in anesthesia only". The College informed the Respondent that, based on

the information obtained in the investigation, he may have been in breach of this restriction.

As part of its investigation, the Registrar appointed an independent Assessor to review a number of the Respondent's patient charts and submit a written report to the Committee. The Assessor opined that the Respondent was practising outside the scope of anesthesia in his interventions for COVID patients. On this basis, the Assessor was of the view that the Respondent failed to maintain the standard of the discipline and therefore demonstrated a lack of judgement. It was the Assessor's opinion that the Respondent's therapeutic decision-making in contradiction to the evidence may have placed patients at risk of harm.

The Respondent's lawyer advised the College in May 2022 that the Respondent had ceased providing care as described in the investigation and would not provide such care in the future.

As a result of this investigation, the Committee had concerns about the Respondent's practice with regard to ivermectin prescribing in defiance of the guidelines, practising outside of his scope and medical record keeping, in light of the fact that he did not appear to be clear as to who was the custodian of his medical records. On this basis, the Committee decided to accept an undertaking from the Respondent and to caution him as above.