Protecting the public. Supporting safe practice.



2019/20 Annual Report

APRIL 1, 2019 TO MARCH 31, 2020



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Formal 2019–20 reports from our Statutory Committees are available on <u>our website</u> and were approved by our governing Council at its July 2020 meeting.

About us

Public Protection. Patient Safety.

The College regulates naturopaths in Ontario in the interest of the public. Our mandate is to support patients' rights to receive safe, competent and ethical naturopathic care.

4 Key Functions of Regulation

We achieve our mandate through four key functions:

1.

Registering Safe, Competent and Ethical Individuals

We establish requirements to enter the profession, set and maintain examinations to test individuals against these requirements, and register competent, ethical and qualified individuals to practise naturopathy in Ontario.

2.

Setting Standards

We set and maintain standards of practice that guide our Members to ensure they provide safe, ethical and competent patient care.

3.

Ensuring Continuing Competence

We create and manage a variety of continuing education and professional development programs to help assure the provision of safe, competent and ethical naturopathic care.

4.

Providing Accountability through Complaints and Discipline

We hold naturopaths accountable for their conduct and practise by investigating complaints and concerns and determining appropriate solutions, including disciplining naturopaths who have not upheld the standards.

When we do our job well, we have set rules that ensure safe care that benefits patients; we have registered the right people who are qualified and committed to providing safe, ethical and competent care; we have ensured that our Members maintain their knowledge, skill and judgement; and we have held those who may have faltered to be accountable for their decisions.

Governance



2019-2020 COUNCIL

Back row (I to r):

George Tardik, ND; Kim Bretz, ND; Jordan Sokoloski, ND; Samuel Laldin; Barry Sullivan; Danielle O'Connor, ND.

Front row (I to r):

Brenda Lessard-Rhead, ND*, (Inactive); Shelley Burns, ND; Dianne Delany; R. Gail Goodman; Tara Gignac, ND.

Not pictured:

Harpal Buttar; Karim Dhanani, ND; Deborah Haswell; Rosemary Hnatiuk, ND; Scott Sawler

Letter from the Registrar

Compiling an Annual Report can often be an odd undertaking in that the amount of effort and the time required to assemble a complete report often culminates with its content having little value to the reader.

Before an Annual Report can be created, the time-period which it reports on first must have elapsed. Only then can data be collected and contextual information prepared so that the reader can make sense out of what is being reported. Finally, the material gathered for the report needs to be put through a rigorous production process which includes editing, fact-checking, translation and design, necessary to make it usable and presentable as an official document of the College.

This report, which spans April 1, 2019 to March 31, 2020 will be published in the fall of 2020, over six months after the period ended. On one hand, I can understand why it is published when it is—knowing the amount of effort required from all College departments to put the report together. However, from the perspectives of transparency and accountability, a late publish date is counterintuitive and unhelpful.

The timing is such that it makes the report, despite all the work needed to create it, almost not worth reading. Publishing a report towards or beyond the end of October is simply not good enough for the College as a public entity. As a health regulatory College, we can, and we will do better.

With that said, there is much debate about what should be included in an Annual Report and there is a concerted effort underway to standardise reporting for all Colleges. To all who read this report, consider this a call to action—we would like to know what would be of value for you to read in this document in the future. Going forward, we are prioritising including information and material that you, the Reader, wish to know more about and understand.

I invite you to share your comments and thoughts with us by sending an e-mail to general@collegeofnaturopaths.on.ca.

Andrew Parr, CAE Registrar and CEO

Registration & Examinations

Registering Safe, Competent and Ethical Individuals

OVERVIEW

This program area oversees:

- qualifying examinations,
- initial registration (entry-to-practise),
- ongoing Member registration,
- post-registration examinations related to high-risk procedures, and
- professional incorporations.

Anyone using the title naturopath, naturopathic doctor, or naturopathe, or docteur en naturopathie in French, or who uses the abbreviation ND in English or D.N. in French must register with us before practising.

Through this program area, we assess and verify the qualifications of people who apply to register as naturopaths in Ontario. We review their education, training and experience; and identify whether there are concerns about their conduct, character or fitness to practise.

Candidates must also pass four entry-to-practise exams to be eligible for registration.

- 1. North American clinical exam
- 2. Ontario Clinical (Practical) exams
- 3. Ontario Clinical Sciences exam
- Administered directly by the College
- 4. Jurisprudence Learning Module

In addition, the College administers and maintains another set of voluntary exams that further protect the public. These exams ensure that naturopaths who include additional higher risk procedures in their practices are qualified to do so.

- The Ontario Prescribing & Therapeutics Exam is for those who want to prescribe, compound, dispense and sell a drug, or inject a drug or substance.
- The Ontario Intravenous Infusion Therapy (IVIT) Exam is for NDs who want to offer this service. Note that naturopaths who wish to offer IVIT must pass both the Ontario Prescribing & Therapeutics Exam and the Ontario IVIT Exam.

The Registration & Examinations program area also oversees the process whereby a naturopath must obtain a certificate of authorisation from the College in order to become incorporated under the *Business Corporations Act* for the purpose of practising a health profession.

Entry-to-Practise Examinations

As identified, above, the College administers three Ontario-based exams. During the reporting period the fourth exam, the Ontario Biomedical exam, was administered during the reporting period by the North American Board of Naturopathic Examiners. Together, the four exams are used to determine a candidate's qualifications for registration as a naturopath in Ontario.

College-administered exams

The Clinical Sciences Examination is a mix of casebased and stand-alone questions, which test for clinical readiness and emphasise a candidate's ability to apply their knowledge and critical thinking. The Ontario Clinical (Practical) Examinations are demonstration-based exams that assesses a candidate's entry-level competencies in naturopathic manipulation, acupuncture and physical examination/instrumentation. The Jurisprudence Learning Module is an online, open-book, learning-oriented module that focuses on the legislation, regulations and standards of practice for the profession in Ontario.

Following two unsuccessful attempts, candidates are provided with remediation to help them achieve success on their third and final attempt of the exam(s). Should a candidate fail to successfully pass the entry-to-practise examinations on their third attempt, they are required to complete an additional naturopathic program accredited by the (CNME). To date this has not occurred.

Ontario Clinical (Practical) Exams Statistics

Overall pass rate	2018–19 86%	^{2019–20}
Number who sat exam	143	128
Total passed	123 106 (1st attempt) 17 (2nd attempt)	91 (1st attempt) 13 (2nd attempt)
Failed*	20 11 manipulation 10 acupuncture	24 5 manipulation
	4 physical exam	10 acupuncture 13 physical exam

* The failed modality breakdown factors in candidates who failed more than one modality in their examinations attempt.

Jurisprudence Learning Module Statistics

Enrollment in the Jurisprudence Exam decreased very slightly from 2018–19, on par with the decrease in those sitting entry-to-practise Clinical examinations in 2019–20.



New entry-to-practise exams

In April 2019, the College launched the first of two new entry-to-practise exams. The Ontario Clinical Sciences Examination replaced the North American Clinical Sciences Exam as a requisite entry-to-practise exam for those seeking registration with the College.

This computer-based written exam focuses on the clinical science skills needed to be a naturopath and augments the College's existing Ontario Clinical (Practical) Examinations in assessing a candidate's qualifications.

The College continued its development work on the Ontario Biomedical Examination, the second of the two new entry-to-practise exams. Like the Ontario Clinical Sciences Examination, the Ontario Biomedical Examination will be a computer-based written examination, focusing on a candidate's understanding of foundational biomedical knowledge of body systems and their interactions. The exam is set to launch November 2020 and will fully replace the North American Biomedical exam as a registration requirement in Ontario in May 2021.

The Ontario Clinical Sciences and Ontario Biomedical Examinations are intended to work together, in conjunction with the Ontario Clinical (Practical) Exams and Jurisprudence Learning Module, to provide the College with a fulsome snapshot of an applicant's skills and knowledge to be able to provide safe, competent and ethical patient care.

Yardstick Assessment Strategies—a leading psychometrics firm—helped guide the development and continues to assist with the ongoing maintenance process of both exams.

Ontario Clinical Sciences Examination

Three sessions of the Ontario Clinical Sciences Examination occurred in this reporting period: June 2019, August 2019 and February 2020.

Ontario Clinical Sciences Examination statistics

Overall pass rate

Candidate

Total passed 75 (1

75 (1st attempt) 11 (2nd attempt)

Failed

Exam pass marks are set through a psychometrically sound process called the "modified Angoff method", which accounts for the difficulty of exam content and an established profile of what a naturopath can be expected to know and be able to do at entry-to-practise. For quality assurance purposes, three separate rounds of scoring are done for each administered exam (one through psychometric software, two independently via psychometric experts) prior to the release of results.

Examination Appeals Committee

This committee of the Council develops policies and procedures governing the appeal process for Collegeadministered examinations. It also reviews appeals filed by candidates related to failed Clinical, IVIT, or Prescribing & Therapeutics Examinations. An appeal can be filed in the event that an irregularity (e.g., a fire alarm sounds during a candidate's exam or one candidate is not provided with the full amount of time that other candidates receive) occurred during the process of a candidate sitting the exam and not solely on a failing grade.

The Committee did not receive any appeals during this fiscal year.

Initial Registration (Entry-to-Practise)

The College maintains a three-part application process for initial registration as a naturopath in Ontario. The first part establishes a candidate's identity, the second queries whether they meet the requirements set out in regulations to enter into practice, and the third part ensures that the necessary insurance is in place and fees are paid to the College.

Completion of the initial registration process results in the College issuing a Certificate of Registration to the individual which allows them to establish a practice and call themselves a naturopath or naturopathic doctor. Every individual in Ontario who refers to themselves as such must be registered with us. This is the public's assurance that the person has demonstrated they can provide safe, competent and ethical care.

A positive decision to register an individual is made by the Registrar & CEO of the College. However, if information comes forward during the application process that suggests that the applicant may not meet the entry-topractise requirements, the application is referred to the Registration Committee for consideration.



REGISTRATION COMMITTEE

This committee considers applications for registration referred to it by the Registrar & CEO of the College where they :

- have doubts on reasonable grounds that the applicant fulfills the registration requirements;
- believe that a term, condition or limitation should be imposed on the applicant's Certificate of Registration; or
- propose to refuse the application.

The applications that are referred to the Registration Committee may be based on the following grounds:

- **currency** as to whether the applicant's knowledge and skills are sufficiently current, including when
 - an application is beyond the two-year timeframe required by the regulations,
 - examinations are completed beyond the two-year timeframe required by the regulation, and
 - the applicant exceeds the number of allocated attempts to complete a registration examination, as set out in the regulations; or
- **good character**, where the applicant's history indicates that they may not be governable or are unlikely to follow the rules set out by the College.

Registration Committee Outcomes

The following summarises the outcomes of the matters referred to the Registration Committee by the Registrar & CEO*.

	2018–19	2019–20
CERTIFICATE ISSUED AT APPLICATION	6	5
CERTIFICATE ISSUED AFTER COMPLETING ADDED EXAMS OR EDUCATION	3	7
CERTIFICATE ISSUED WITH TERMS, CONDITIONS OR LIMITATIONS	—	2
CERTIFICATE ISSUED AFTER COMPLETING MORE EDUCATION OR TRAINING	-	2
DENIED REGISTRATION		5

* Includes applicants who were mandated to complete more than one requirement (e.g., exams and additional education) prior to issuance of a certificate.

Referrals to the Registration Committee

2018–19 2019–20 **11 15**

Decisions of the Registration Committee, with the exception of a decision to direct the Registrar & CEO to issue a certificate of registration, can be appealed to the Health Professions Appeal and Review Board. The Board is discussed in more detail on page 39.

MEMBERS OF THE COLLEGE

Registration renewal

In order to maintain their status as Members of the College, naturopaths must renew their registration every year, including paying an annual fee and providing important updates of information to the College.

There are two classes of registration:

- 1. General Class—Active naturopaths in Ontario who practise a minimum of 750 hours over a three-year period; and
- 2. Inactive Class—Naturopaths who do not currently practise the profession, including Retired Members or those who do not practise in Ontario.

Retired Members may be entitled to Life Membership. This honourific title is granted by the Registration Committee to Members who meet specific criteria, including having held registration for 25 years or more and who are no longer practising.

Overall, there was a 3% increase in total Members in this fiscal year indicating relative stability in the longevity of the profession in Ontario.

Renewal statistics

On March 17, 2020, in response to the COVID-19 pandemic, a state of emergency was declared by Ontario government pursuant to the Emergency Management and Civil Protection Act. In light of the state of emergency and in recognition of the challenges faced by many Members as a result of COVID-19, the Council of the College granted relief measures in April which included extending the renewal payment deadline to September 30, 2020 and reducing membership fees by 40% for the 2020-21 fiscal year.

As of March 31, 2020, 99% of Members had completed their Information Return form and 54% had renewed their registration, with submission of both their fee and the Information Return form.

Renewal statistics

2018-19

2019-20

95%

% renewed by March 31, 2020

42 $\mathbf{74}$

resignations

revocations

*As set out in section 16 of the Registration Regulation, a Member's certificate of registration is revoked on the day that is two years after the date on which it was suspended if the suspension has not been lifted.

Registration by class

(# of Members)

Total	1,591	1,704
Life Members	15	19
Inactive Class	152	169
General Class	1,424	1,516
	2018–19	2019–20

Referrals to the Registration Committee

In addition to considering new applications for registration referred to it by the Registrar & CEO, the Registration Committee also considers cases related to other criteria set out in the *Registration Regulation*. These include:

- Members who wish to change their class of registration from Inactive to General where they have been inactive for more than two years; and
- applications from Members for Life Membership.

There were far fewer referrals for post-registration Membership-related items than in the previous fiscal year.

	2018–19	2019–20
Class change	5	-
Life Membership	4	4
Reinstatement	3	_

POST-REGISTRATION EXAMINATIONS FOR EXTENDED SERVICES

These examinations are administered primarily to Members of the College who wish to perform the following high-risk procedures:

- prescribe, dispense, compound, sell a drug and/or administer a substance by injection; and/or
- administer a substance by Intravenous Infusion Therapy (IVIT).

In both cases, naturopaths are required to successfully complete an education program approved by the Council of the College and an exam approved or administered by the College. These requirements provide an added layer of protection for the public by ensuring the naturopath is able to perform these high-risk procedures competently, safely and ethically.

83 Members met the *Standard of Practice for Prescribing* in 2019–20. In total, 764 Members, or about 45% the profession, have passed the exam since its inception in June 2014.

Prescribing and Therapeutics Examination

This examination tests a candidate's competency to be able to develop, implement and monitor evidencebased therapeutic plans, including whether they have the relevant knowledge to use the drugs and substances listed in the tables of the College's *General Regulation*. In 2018, policy changes extended exam eligibility to NDs registered in another regulated Canadian jurisdiction and 4th year students enrolled in a CNME-accredited program in naturopathy. **Enrolment in the examination increased by 9.7% in 2019.** Of the 136 individuals who sat the exam 2019–20, 28 were enrolled in their fourth and final year of the educational program in naturopathy at the Canadian College of Naturopathic Medicine (CCNM) and two were registered to practise naturopathy in another regulated Canadian jurisdiction.

	2018–19	2019–20	
Overall pass rate	72%	70%	
Passed	89*	95	
Failed	35	41	
Prescribing Exam f	ailures by compone	nt	
Written	13	20	
Oral	12	17	
Both	10	4	

* This figure includes fourth-year students who passed but who were not registered with the College during the period reported on. They are therefore not included in the total number of College Members who have passed the exam.

Some of the factors that contribute to passing this exam include:

- allowing the full three to six months of recommended time to complete the course and prepare for the exam;
- reading all questions fully, especially in the cases presented in the oral exam; and
- managing time answering questions.

Registration & Examinations

Intravenous Infusion Therapy Exam

Naturopaths who wish to perform Intravenous Infusion Therapy (IVIT) must meet two specific standards of practice.

- <u>Standard of Practice for Intravenous Infusion Therapy</u> (<u>IVIT</u>), which is accomplished by successfully completing a College-approved IVIT course and the College's IVIT exam.
- 2. <u>Standard of Practice for Prescribing</u>, which requires successful completion of the Prescribing and Therapeutics Examination described above.

Registration for the Ontario IVIT Examination remained consistent with 2018–19 numbers, however fewer candidates sat the December session as a result of candidate cancellations due to inclement weather on exam day. Fiftyone Members were deemed to have met the Standard of Practice for IVIT in 2019–20. In total, 196 Members have passed the examination since its inception in July 2016.

	2018–19	2019–20	
Passed	51 (78.4%)	51 (81%)	
Failed	14	12	
2019–20 Ontario IVIT Examination failures by component			
Osmolarity	6	3	
Written MCQ*	3	5	
Practical	—	2	
Osm & MCQ**	—	2	
Practical & MCQ	1	—	
* Multiple choice questions			

0010 00

* Multiple choice questions

2018–19

** osmolarity and multiple-choice questions

PROFESSIONAL CORPORATIONS

Naturopaths may incorporate under the *Business Corporations Act* to practise a health profession. To do so, Members must apply for, and receive, a Certificate of Authorization from the College. As this process includes both an application and evaluation process as well as an annual renewal of the Certificates, it is overseen by the Registration and Examinations area of the College.

As of March 31, 2020, the College had issued a total of 73 Certificates of Authorization for Naturopathic Professional Corporations.

Corporation applications data			
	2018–19	2019–20	
New applications	9	9	
Approved	9	9	
Denied			
Closed for incompleteness	_		

RENEWALS APPROVED FOR EXISTING CORPORATIONS

The College of Naturopaths of Ontario - Annual Report 2019/20

2019-20

Setting Standards

The second of our four key functions is to set and maintain standards of practice of the profession that guide our Members to ensure they provide safe, competent and ethical patient care. Standards of practice also serve to guide and inform the public on what to expect from a naturopath in key areas of practice.

STANDARDS AND GUIDELINES FOR THE PROFESSION

The College has established and maintains 28 standards of practice including:

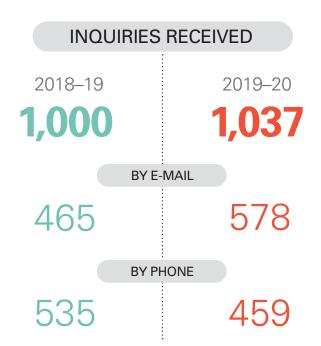
- Therapeutic Relationships and Professional Boundaries,
- Requisitioning Laboratory Tests,
- Infection Control,
- Fees and Billing,
- Consent, and
- Advertising, among many others.

The College has also established and maintains 11 <u>practice guidelines</u> to help Members and the public understand how the standards might best be implemented. Some key guidelines include:

- · Advertising,
- Conflict of Interest, and
- Sterile Compounding of Injectables, among others.

REGULATORY GUIDANCE

The College's Regulatory Guidance program responds to inquiries from naturopaths, the public and other interested parties such as insurance companies, other regulators and professional associations. The Program provides clarity about our regulations, standards of practice, guidelines and policies, and other elements related to the regulation of naturopathy in Ontario.



The number of inquiries has stayed relatively consistent since the College was established in 2015, but the topics we are asked about the most have changed.

In 2019–2020 the Inspection Program, fees and billing, telepractice, scope of practice in Ontario, and laboratory testing remain in the top 10 areas most commonly asked about. However, new to the list were COVID-19, continuing education, and Peer and Practice Assessments. Setting Standards

In March 2020, the COVID-19 pandemic and directive from Ontario's Chief Medical Officer of Health prompted many inquiries related to the restrictions on the health professions, specifically essential services and providing care via telepractice. Reappearing in the top 10 were inquiries about patient visit issues, advertising and record keeping.

Top 10 Topics

	2018–19	2019–20
Inspection Program	99	77
Quality Assurance Program (continuing education, Peer and Practice Assessments)	21	77
Fees and billing	67	66
Telepractice	43	57
Advertising	24	55
COVID-19	0	55
Scope of practice in Ontario	57	47
Patient visits	22	40
Record keeping	23	40
Laboratory tests	59	39

The <u>Regulatory Guidance section</u> of our website houses a number of articles and information sheets about the issues either most commonly asked about or what we feel is important for Members and the public to know.



5 most frequently accessed Regulatory Guidance topics

Can a Member Offer Discounts to Patients?

7 Tips for Using Electronic Records in Your Practice

<u>8 Social Media Tips for NDs</u> [infographic]

Naturopaths and Vaccinations

Pitfalls to Avoid When Joining <u>a Practice</u>

5

Each issue of our <u>News Bulletin</u> includes a practicerelated FAQ. Topics this reporting period included:

- Can I use a treatment like reiki or Bowen therapy in my practice?
- When do I have to submit my next continuing education (CE) logs?
- Can I submit my CE reporting log before the required deadline?
- I am leaving a clinic that I took over from another naturopath. Can I take the patient files with me?

- Can I bill it as a naturopathic visit when I send my patients to the nutritionist in my clinic who discusses a diet plan that incorporated the dietary recommendations I have made?
- Can I include patient reviews on my clinic's Facebook page?
- I was recently contacted by the family of a deceased patient asking for the patient's health information.
 Can I release the information to the family?
- How do I change my Class of Registration?

ONGOING REVIEW OF THE STANDARDS AND GUIDELINES

The Quality Assurance Committee is responsible for maintaining the standards of practice and guidelines for the profession. This Committee has a mandate to review 25% of all standards and guidelines annually. As a result, all standards and guidelines are reviewed over a four-year cycle.

In reviewing standards and guidelines, the Committee members will consider naturopathic practice and patients' needs and will identify potential changes. The Committee also considers needs for additional standards, often times based on advice from other committees and programs. New standards and proposed changes to existing ones are circulated to College Members and other stakeholders for review and feedback. All feedback is carefully considered and final changes brought forward to the Council of the College for review and approval.

Standard & Guideline Review Statistics



* Non-Medical (recreational) Cannabis

STANDARDS FOR PREMISES DOING INTRAVENOUS INFUSION THERAPY (IVIT)

In addition to setting standards of practice for the profession, the College has established standards of practice governing clinics where IVIT is offered by naturopathic doctors. These standards are set through the Inspection Program that is established in the General Regulation made under the *Naturopathy Act, 2007*.

IVIT procedures include:

- compounding¹ drugs to make a customised therapeutic product for administering to a patient by IV injection, and
- administering a therapeutic product by IVIT.

The Inspection Program:

Putting patient safety at the forefront

The College's Inspection Program helps to ensure the safety and quality of care for Ontarians who choose to access Intravenous Infusion Therapy (IVIT) from a naturopath. All premises where IVIT is offered must meet strict standards because of the added risk associated with this procedure. The College inspects all facilities every five years.

It is also important for patients to know that in addition to passing rigorous examinations, naturopaths who offer this service must also complete extra continuing education each year. Patients can check our online <u>IVIT Premises</u> <u>Register</u> to make sure the locations they visit have been registered and inspected. Our <u>Public Register</u> provides another layer of patient safety by confirming whether the naturopath has been authorised by the College to offer IVIT by passing two exams: the Ontario Prescribing and Therapeutics Exam and the Ontario IVIT Exam.

Inspection Committee

The Inspection Program is supported by an Inspection Committee of IVIT-qualified naturopaths and a member of the public. The Inspection Committee met 7 times during the reporting period and delivered 64 outcomes (results) to existing and new premises.

Inspections Completed

	2018–19	2019–20
Existing premises	81	-
New premises—Part I*	20	24
New premises—Part II**	11	26

No existing premises were inspected in 2019–20 since, as required in the *General Regulation*, all existing premises had an initial inspection completed before March 1, 2019, and will now be inspected every five years. All new premises were inspected (Part I) within 180 days of being registered with the College.

* Part I occurs before any IVIT procedures being performed and includes the program requirements that must be in place in order to be fully prepared to provide safe and competent IVIT procedures.

¹ The process of combining, mixing, or altering ingredients to create a medication tailored to the needs of an individual patient.

^{**} Part II involves the requirements that can only be inspected once procedures have been performed. This includes the observation of the IVIT procedures performed at the premises (compounding for and/or administering IVIT) and a review of IVIT patient records.

Inspection Outcomes	2018–19 # OF PREMISES	2019–20 # OF PREMISES
Final outcome of a pass	75	48
Preliminary outcome of a pass with conditions and final outcome of a pass	29	10
Preliminary outcome of a pass with conditions and final outcome of a pass with conditions	2	2
Preliminary outcome of a pass with conditions, final outcome not delivered in 2018-2019 fiscal year	3	2
Preliminary outcome of a fail and a final outcome of a pass	-	-

Reporting Type 1 Occurrences

An occurrence is a negative outcome as a result of the administration of IVIT to a patient. A Type 1 occurrence is a significant negative outcome. Type 1 occurrences are:

- 1. The death of a patient at the premises after a procedure was performed.
- 2. The death of a patient that occurs within the five days following the performance of a procedure at the premises.
- Any referral of a patient to emergency services within the five days following the performance of a procedure at the premises.
- 4. Any procedure performed on the wrong patient at the premises.
- 5. The administration of an emergency drug to a patient immediately after a procedure was performed at the premises.
- 6. The diagnosis of a patient with shock or convulsions occurring within the five days following the performance of a procedure at the premises.

7. The diagnosis of a patient as being infected with a disease or any disease-causing agent after a procedure was performed at the premises, if the member is of the opinion that the patient is or may have been infected because of the performance of a procedure.

All Members must report a Type 1 occurrence within 24 hours of learning about it.

Type 1 Occurrences Reported

	2010-13	2013-20
Any referral of a patient to emergency services within the 5 days following the performance of a procedure at the premises.	12	10
The administration of an emergency drug to a patient immediately following an IVIT procedure.	2	2
The death of a patient that occurs within 5 days following the performance of a procedure at the premises.	1	2
Procedure performed on the wrong patient at the premises.	-	1

2018-19 2019-20

Whenever a Type 1 occurrence is reported, the College collects relevant information and brings the matter before the Inspection Committee. The most serious cases involve the death of a patient within five days of an IVIT procedure. In both the current and prior year reported on, the patients were receiving adjunctive care* for a terminal illness from a naturopath at the premises. Their passing, although sad, was not unexpected.

In each of the Type 1 occurrence reports noted above, the Committee's review determined that no further action was warranted. If this had not been the case, the Committee might have:

- · Ordered a new inspection of the premises,
- Directed the Registrar to refer the report to the Quality Assurance Committee if the Inspection Committee believed that the knowledge, skill or judgement of the Member who performed the procedure was unsatisfactory; or
- Directed the Registrar to refer the report to the Inquiries, Complaints and Reports Committee if the Inspection Committee believed that the Member who performed the procedure committed an act of professional misconduct or may have been incompetent or incapacitated.

The ability of the Inspection Committee to refer matters to other regulatory processes within the College is an important way of fully integrating our various regulatory programs to provide public protection and ensure patient safety.

Reporting Type 2 Occurrences

All premises where intravenous infusion therapy (IVIT) procedures are performed are also required to track Type 2 occurrences and must report these to the College every year.

Type 2 occurrences are:

- Any infection occurring in a patient in the premises after an IVIT procedure was performed at the premises.
- An unscheduled treatment of a patient by a Member within five days after an IVIT procedure was performed at the premises.
- Any adverse drug reaction in a patient after an IVIT procedure was performed at the premises.

There was an increase in the number of Type 2 Occurrences reported. We attribute this to revisions we made to the reporting form, including the addition of drop down menus to help inform Members what is to be reported. The increase also likely reflects increased Member awareness

Type 2 Occurrences Reported	Number Reported**	
	March 2, 2018– March 1, 2019	March 2, 2019– March 1, 2020
Infections occurring in a patient in the premises after an IVIT procedure was performed at the premises.	2	1
Unscheduled treatments of a patient by a Member occurring within five days after an IVIT procedure was performed at the premises.	7	5
Adverse drug reactions occurring in a patient after an IVIT procedure was performed at the premises.	91	126

Type 2 Occurrences Reported

*Although the Type 2 Occurrence reporting period does not align exactly with the College's fiscal year, the reporting dates are accurate within one month of one fiscal year end and the beginning of the next.

* Adjunctive care is treatment that is in addition to other forms of care a patient is receiving.

of ensuring they are tracking and reporting occurrences, potentially combined with more premises performing procedures.

Once the College receives the Type 2 occurrence information, the data is provided to both the Inspection Committee and the Council of the College for information purposes. The Inspection Committee considers the information in the context of any developing trends that may indicate that more information should be given to the premises and Members performing IVIT to address potential deficiencies. The information is also used in the context of reviewing the standards that govern premises with the intent of strengthening public safety.

PATIENT RELATIONS PROGRAM

A Patient Relations Program is mandated under the legislation governing the College. The Program is responsible for developing and delivering measures for preventing and dealing with sexual abuse of patients. It does so by:

- · establishing educational requirements for Members,
- creating guidelines for conduct of Members with patients,
- training College staff, and
- providing information to the public.

The program is overseen by the Patient Relations Committee which includes naturopaths and members of the public.

Updates to the Patient and Member guides were proposed by an expert in sexual abuse who undertook a review of the Patient Relations materials at the request of the Committee. The proposed changes were considered and updates were made to the documents to add consistency and clarity.

SCHEDULED SUBSTANCES REVIEW COMMITTEE

The Scheduled Substances Review Committee (SSRC) is a Committee of the Council. It oversees a process of continuous review of the regulations governing the drugs and substances that naturopaths may prescribe, dispense, compound, sell and inject, including by intravenous infusion therapy. The SSRC also oversees the review process surrounding the laboratory testing that naturopaths are authorised to use in their practice. The Committee makes recommendations to the Council and oversees consultations in this area on the Council's behalf.

The Committee finalised and submitted to the Ministry of Health on behalf of the Council proposed amendments to the tables in the General Regulation made under the *Naturopathy Act, 2007* as well as suggested amendments to the *Laboratory Specimen Collection Centre Licensing Act.*

In addition to reviewing the regulations governing the drugs, substances and the laboratory tests authorised to naturopaths, the Council of the College tasked the SSRC with undertaking a review of the scope of practice of the profession.



Quality Assurance

Ensuring Continuing Competence through Education Our Quality Assurance (QA) Program supports naturopaths with a comprehensive approach that helps them stay current and provide the best possible level of care for Ontarians. The program also allows the College to help naturopaths improve their practice through remedial activities when needed. All naturopaths registered in the General Class (active status) must participate in the Program and demonstrate a commitment to ongoing learning and improvement.

The Quality Assurance Program is overseen by the Quality Assurance Committee—a committee that is mandated under legislation.

The Program has three components.

1. Self-Assessment

This component helps naturopaths reflect on their skills with respect to the core competencies and standards of practice of the profession.

The Quality Assurance Committee created a new Self-Assessment tool focused on advertising, which included an online questionnaire with interactive questions to help Members assess and amend their advertising where necessary. In 2019/20, the deadline for completing the online self-assessment was extended due to the COVID pandemic. By March 31, 2020 (the end of the fiscal year) 1,185 Members had already completed their selfassessment.

2. Continuing Competency and Professional Development

Practising naturopaths must participate in 70 hours of Continuing Education (CE) every three years, which can be obtained through a mix of Category A and Category B courses. Those who provide intravenous infusion therapy (IVIT) must complete an additional six credits of clinical learning. Members may also undertake additional credits that further their professional development.

CE Reporting	2018–19	2019–20
# of Members required to report CE	433 (GROUP I)	403 (GROUP II)
% submitted CE logs by deadline	91%	95%
CE log extensions/amendments granted	8 OUT 8 OF 8 REQUESTS	10 OF OF REQUESTS

Category A—The College approves specific courses to be eligible for Category A Continuing Education (CE) credit. These courses are structured learning activities that address the core clinical competencies of the profession.

Category B—Members may also complete up to 40 credits of Category B credits as self-directed learning activities of any type and in any area the Member chooses. Category B activities are not pre-approved.

Number of Approved Category A Courses

2018–19

402 Category A credit applications received

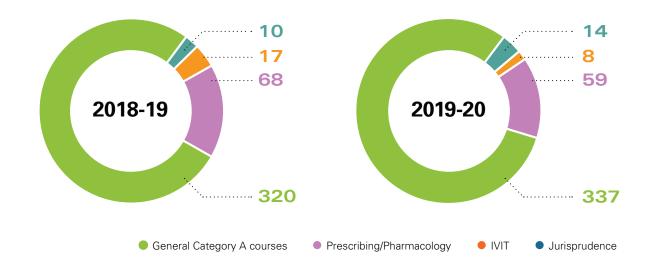
93%

2019–20

Category A credit applications received

74%

Approved Category A courses by category





Course delivery modalities

3. Peer and Practice Assessment

Each year a group of practising naturopaths is randomly selected to undergo an objective review of their knowledge and performance by College-trained assessors who are also practising naturopaths.

	2018–19	2019–20
Members randomly selected	75	75
Completed peer and practice assessments	68	64
Referred to the ICRC for non-compliance with the QA Program	0	1
Removed from the selection pool	7	10
Reasons for removal from selection pool		
Deferred	4	5
Changed class to Inactive	1	3
Resigned	0	2
Suspended for non-payment of fees	2	0
Outcomes of completed peer and practice assessments		
Demonstrated the knowledge, skill and judgment to meet the standards	68	55
Fell below the standards in at least one component of the assessment and were referred to the QA Committee	0	9
Outcome for Members who fell below the standards		
Member's submission to the QA Committee demonstrated deficiencies were adequately addressed and knowledge, skill and judgment is satisfactory	<i>/.</i> 0	4
Member resigned before QA Committee's final decision.	0	1
Member's submission is pending	0	4

Professional Conduct

Accountability through Complaints and Discipline

INQUIRIES, COMPLAINTS AND REPORTS COMMITTEE (ICRC)

The College receives complaints and reports about the practice and conduct of naturopaths. All complaints are investigated. With approval from the ICRC, the College Registrar and CEO may also initiate investigations where reported information suggests reasonable and probable grounds to believe a naturopath may have engaged in professional misconduct or is incompetent. The results of investigations are considered by the ICRC which may

take no action, order a range of educational or remedial activities, or refer a naturopath to the Discipline Committee or the Fitness to Practise Committee for a hearing.

<u>Our website includes anonymised summaries</u> of outstanding complaint and report investigations as part of our commitment to transparency. We are the first health regulatory College in Ontario to publish this kind of summary information.



The ICRC took the following actions in response to the complaints/reports reviewed. All decisions made by the ICRC can be appealed to the independent Health Professions Review Board, which is discussed in more detail on page 39.

	2018–19	2019–20
TOTAL decisions	40	35
No further action	6	5
Letter of advice/counsel	19	17
Oral Caution	4	2
Specified Continuing Education and Remediation Program (SCERP)	2	1
SCERP & Oral Caution	3	2
Acknowledgement & Undertaking	1	1
Referral to Fitness to Practise Committee	-	-
Referral to Discipline Committee	5	6
Frivolous and vexatious	-	1

Types of Complaints/ Registrar's investigations before the ICRC

	2018–19	2019–20
Advertising	15	30
Inappropriate billing procedures	6	6
Inappropriate/unsatisfactory patient care	5	7
Practising outside their scope	5	7
Failure to comply with the Standard for IVIT/Injections	2	8
Sexual abuse, violation of professional boundaries	2	1
Failure to cooperate or comply with an order of Discipline Committee/ICRC	2	2
Practising while Inactive/Suspended	1	2

Trends in the matters reviewed by the ICRC continue to be about the advertising of services that naturopaths are not authorised to perform, including Intravenous Infusion Therapy and cancer care. In addition to actions the ICRC may take in response to a complaint (including referring it to the Discipline Committee), we continue to provide naturopaths with additional guidance and information about this topic. This includes publishing advisories and providing additional guidance in our <u>newsletters</u> and <u>Registrar's blog</u>.

To help naturopaths identify areas of potential concerns within their own practice, we also publish Complaint Scenarios in our *iNformeD* newsletter, including analysis of the allegations in question and summaries of Oral Cautions ordered by the ICRC.

Investigation timelines: Complaints/Registrar's Reports

	2018–19 # of days	2019–20 # of days
Average length	164	184
Shortest	34	62
Longest	505	591

The legislation governing the College requires that a complaint be completed within 150 days and, in cases where that timing cannot be met, the complainant, the Member and the Health Professions Appeal Board are notified every 30 days. While the average timeframe of 184 days above is over the 150 day period anticipated in the legislation, it is generally a positive indicator as it demonstrates our intent of processing such matters expeditiously in fairness to both the public and Members.

The longest timeframe of 591 days was related to an investigation of a complaint reported by an insurance company involving fraudulent billing practices. The College had to coordinate its investigation with Ontario police and insurance investigators in order to obtain reasonable evidence before referring the file for a disciplinary hearing.

Investigation costs: Complaints/Registrar's Reports

The cost of an investigation includes the College's legal expenses, investigators' fees (where formal investigator appointments are required), experts' fees, ICRC per diems and mailing costs.

	2018–19	2019–20
Average cost to the College	\$2,198	\$2,508
Highest cost	\$12,846	\$18,354
Lowest cost	\$150	\$108

ICRC & FITNESS TO PRACTISE

When information comes to the College's attention that a naturopath may be incapacitated, the Registrar & CEO will make inquiries and report this information to a Health Inquiry Panel of the ICRC. After conducting inquiries into the naturopath's health, which may include requiring them to undergo independent medical examination, the Health Inquiry Panel may refer a matter to the Fitness to Practise Committee for incapacity proceedings. The ICRC may also refer a Member in the College's formal complaints process to a Health Inquiry Panel.

Incapacitated is defined in the *Regulated Health Professions Act, 1991* as meaning that a Member is suffering from a physical or mental condition or disorder that makes it desirable in the interest of the public that the Member's certificate of registration be subject to terms, conditions or limitations, or that the Member no longer be permitted to practise.

The ICRC disposed of 1 health inquiry during the reporting period.

DISCIPLINE COMMITTEE

When an investigation reveals that a naturopath may have demonstrated a serious lack of knowledge, skill or judgment in the provision of health care, or has seriously breached the Standards of Practice, allegations of professional misconduct or incompetence may be referred to the Discipline Committee for a hearing. The Discipline Committee can order a range of penalties, including fines, a reprimand, suspension or revocation of a Member's certificate of registration.

The Discipline Committee is independent of the Council of the College although it is supported by many of the same Members and staff. This independence ensures that panels of the Discipline Committee are free from any direction by the Council or College when deliberating matters.

Informing the public

Information about upcoming discipline hearings is posted in the <u>News & Discipline Hearings</u> section of our website. Summaries of every discipline decision, and the reasons for them, are published in our quarterly newsletter, *iNformeD*, and included in every annual report. Copies of discipline Decisions and Reasons are posted on the <u>Public Register</u> and in both official languages on the <u>Discipline Outcomes</u> <u>webpage</u> indefinitely.

Discipline statistics

	2018–19	2019–20
Discipline hearings completed	2	4
Findings of professional misconduct	1	4
Number of hearing days	6	4
Number of referrals from ICRC	5	6
Fitness to Practise hearings	-	-
Reinstatement hearings	-	-
Divisional court reviews	_	-

Discipline hearings completed: 4

Dr. Anthony Yores, ND, file DC18-02 referred by the ICRC on September 17, 2018 The Member was found guilty of professional misconduct. Hearing date: August 22, 2019. Number of Hearing Days: 1

Dr. Elvis Ali, ND (inactive), file DC18-03 referred by the ICRC on October 4, 2018 The Member was found guilty of professional misconduct. Hearing date: April 30, 2019. Number of Hearing Days: 1

Dr. Michael Yarish, ND, file DC18-04 referred by the ICRC on November 1, 2018 The Member was found guilty of professional misconduct. Hearing date: July 25, 2019. Number of Hearing Days: 1

Dr. Salfe Elizalde, ND, file DC19-02 referred by the ICRC on May 13, 2019 The Member was found guilty of professional misconduct. Hearing date: November 6, 2019. Number of Hearing Days: 1

Six matters were referred to the Discipline Committee by the ICRC during the reporting period:

- File DC19-02, Dr. Salfe Elizalde, ND
- Files DC19-03 & DC19-04, Dr. Helen Cohen, ND
- File DC19-05, Dr.Yelena Deshko, ND
- File DC19-06, Dr. Taras Rodak, ND
- File DC20-01, Dr. Elvis Ali, ND (inactive)

Costs: Discipline matters

Section 53.1 of the Health Professions Procedural Code provides that, in an appropriate case, a discipline panel may make an order requiring a Member who the panel finds has committed an act of professional misconduct, to pay all or part of the College's costs and expenses. The panel awards costs on a case-by-case basis.

The College incurred the following costs and expenses regarding the discipline matters completed in the reporting period:

Dr. Anthony Yores, ND, file DC18-02

- Legal costs and expenses: \$26,587
- Investigation costs: \$8,791
- Hearing costs: \$4,624

The Panel ordered the Member to pay the College's costs fixed in the amount of \$5,000, which amounted to 12.5% of the College's costs.

Total cost to the College: \$35,002.

Dr. Elvis Ali, ND (inactive), file DC18-03

- Legal costs and expenses: \$12,451
- Investigation costs: \$4,611
- Hearing costs: \$2,734

The Panel ordered the Member to pay the College's costs fixed in the amount of \$3,500, which amounted to 18% of the College's costs.

Total cost to the College: \$16,296.

Dr. Michael Yarish, ND, file DC18-04

- Legal costs and expenses: \$13,738
- Investigation costs: \$3,456
- Hearing costs: \$2,059

The Panel ordered the Member to pay the College's costs fixed in the amount of \$3,500, which amounted to 18% of the College's costs.

Total cost to the College: \$15,753.

Dr. Salfe Elizalde, ND, file DC19-02

- Legal costs and expenses: \$19,467
- Investigation costs: \$4,396
- Hearing costs: \$2,978

The Panel ordered the Member to pay the College's costs fixed in the amount of \$4,000, which amounted to 15% of the College's costs.

Total cost to the College: \$22,841.

FITNESS TO PRACTISE COMMITTEE

The Fitness to Practise Committee conducts hearings when a panel of the ICRC refers matters to do with a Member's capacity. Mental health or substance abuse issues are examples of factors that may impact a naturopath's capacity to practise safely and may result in a Fitness to Practise referral.

There were no referrals to the Fitness to Practise Committee during the reporting period.

UNAUTHORIZED PRACTICE

The College also receives information about individuals who are advertising as a naturopath or naturopathic doctor, or providing naturopathic services to patients. These individuals are not registered with the College and are called "unregulated" or "unauthorised" practitioners. They are practising illegally. In such cases, we issue cease and desist letters and may pursue legal action through the courts. We publish names of people who are not authorised to practise in the <u>Unauthorized Practitioner</u> <u>Register</u>.

Cease and desist letters issued



DISCIPLINE DECISION SUMMARY

Full discipline decisions are available on in the online <u>Public</u> <u>Register</u> under the Member's profile and in the <u>Resources</u> section of our website.

Dr. Elvis Azad Ali, ND (Inactive) Registration #0617 Hearing Date: April 30, 2019

Summary of Allegations:

- Falsifying records relating to the Member's practice, specifically, creating intake forms, consent forms and/or chart notes for visits he had not undertaken with patients.
- Signing or issuing, in a professional capacity, a document that the Member knew contained false or misleading statements.
- Providing false and/or misleading information to an insurer and/or the College.
- Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all circumstances, would be reasonably regarded by Members as disgraceful, dishonourable or unprofessional.

The Agreed Statement of Facts had been agreed on before the hearing. The Discipline Panel found that the Member committed acts of professional misconduct as admitted by the Member.

Admission of Professional Misconduct

A Joint Submission as to Penalty and Costs had been agreed upon prior to the hearing. The parties submitted that the public was protected because the Member had accepted responsibility for his actions and had agreed to an appropriate penalty which provided for specific and general deterrence, rehabilitation and monitoring.

Order

The Discipline Panel imposed an order:

- 1. Requiring the Member to appear before the Panel to be reprimanded immediately following the hearing of this matter.
- Directing the Registrar to suspend the Member's certificate of registration for a period of eight months, two months of which shall be remitted if the Member complies with the provisions of paragraphs 3(a) and 3(b) no later than September 30, 2019.
- Directing the Registrar to impose the following specified terms, conditions and limitations on the Member's certificate of registration:
 - a. requiring that the Member unconditionally pass the PROBE course in ethics;
 - b. requiring that the Member write an essay about the lessons he learned in completing the PROBE course.
 - c. the Member is a non-clinical naturopath and cannot engage in direct patient care within the scope of practice of the profession, cannot perform, or delegate any controlled acts authorised to the profession, nor accept the delegation of any controlled acts as set out in section 27 of the *Regulated Health Professions Act, 1991*.
- 4. For greater certainty, the Member's obligation to comply with the proposed terms, conditions and limitations on his certificate of registration contained in paragraph 3(a) and 3(b) is not relieved by serving the entire suspension referred to in paragraph 2 above.
- Requiring the Member to pay a fine of not more than \$350 to the Minister of Finance within two months of the date of the hearing.
- Requiring the Member to pay the College's costs fixed in the amount of \$3,500 payable in a schedule determined by the Registrar.

The Panel concluded that the proposed penalty was reasonable and in the public interest, and that it satisfied the principle of public protection.

Dr. Anthony James Yores, ND

Registration #1250 Hearing Date: August 22, 2019

Summary of Allegations:

- Breaching an Undertaking that the Member signed with the CEO of the Clinic, specifically, by receiving direct payment from patients for cannabis oil, providing home visits to patients, and receiving direct payment for those visits.
- Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose.
- Administering an unauthorised drug and substance, specifically, administering by IVIT Dichloroacetate (DCA) and alpha lipoic acid.
- Failing to disclose to patients during home visits that he was not attending as a representative of the clinic and not disclosing to the clinic any information about home visits to the clinic's patients, thus misleading patients and the clinic.

The Agreed Statement of Facts had been agreed on before the hearing. The Discipline Panel found that the Member committed acts of professional misconduct as admitted by the Member.

Admission of Professional Misconduct

A Joint Submission as to Penalty and Costs had been agreed upon prior to the hearing. The parties submitted that the public was protected because the Member had accepted responsibility for his actions and had agreed to an appropriate penalty which provided for specific and general deterrence, rehabilitation, and monitoring.

Order

The Discipline Panel imposed an order:

- 1. Requiring the Member to appear before the Panel to be reprimanded immediately following the hearing of this matter.
- 2. Directing the Registrar to suspend the Member's certificate of registration for a period of seven months, three months of which shall be remitted if you comply with the provisions of paragraphs 3(a) through 3(d) no later than January 31, 2020.

- Directing the Registrar to impose the following specified terms, conditions and limitations on the Member's certificate of registration:
 - a. Requiring that the Member unconditionally pass, by June 30, 2020, the PROBE course in ethics and jurisprudence;
 - b. Requiring that the Member successfully complete by December 31, 2019 the College IVIT Course;
 - c. Requiring that the Member successfully complete by December 31,2019 the College Jurisprudence Course;
 - Requiring that the Member successfully complete by December 31, 2019 the Medical Records Course at the University of Toronto;
 - e. Requiring that the Member successfully complete up to one meeting, to be determined by the Registrar, with a Regulatory Expert within 12 months following the lifting of the suspension; and
 - f. Requiring that the Member write an essay approximately 1,000 words in length and provide it to the Registrar no later than one month from the date of the meeting with the Regulatory Expert, or if the Registrar determines that no such meeting is required no later than one month from the date the Registrar provides notice to the Member, on the following issue:
 - i. The lessons the Member learned in completing the ProBE, IVIT, Jurisprudence, and Medical Records courses and the meeting with the Regulatory Expert (if required by the Registrar).
- 4. For greater certainty, the obligation to comply with the proposed terms, conditions and limitations on the Member's certificate of registration contained in paragraph 3 is not relieved by serving the entire suspension referred to in paragraph 2 above.
- Requiring the Member to pay the fine of not more than \$350 to the Minister of Finance within two months of the date of the hearing.
- 6. Requiring the Member to pay the College's costs fixed in the amount of \$5,000 payable in a schedule determined by the Registrar.

The Panel concluded that the proposed penalty was reasonable and in the public interest, and that it satisfied the principle of public protection.

Dr. Michael Bohdan Yarish, ND

Registration #1577 Hearing Date: July 25, 2019

Summary of Allegations:

- Failing to comply with the Standard of Practice for Injections and Infection Control, specifically, injecting a patient with a potentially contaminated needle previously used on another patient.
- Failing to comply with the Standard of Practice for Intravenous Infusion Therapy (IVIT), specifically, failing to ensure and supervise appropriate administration of the IVIT.
- Failing to comply with the Standard of Practice for Conflict of Interest, specifically, providing B12 injections to a patient who is also an employee of the Member.
- Failing to comply with the Standard of Practice for Injections and Compounding, and the College Policy on Laminar Air Flow Hood, specifically, failing to use a laminar air flow hood when compounding sterile injectables for the purpose of IVIT.

The Agreed Statement of Facts had been agreed on before the hearing. The Discipline Panel found that the Member committed acts of professional misconduct as admitted by the Member.

Admission of Professional Misconduct

A Joint Submission as to Penalty and Costs had been agreed upon prior to the hearing. The parties submitted that the public was protected because the Member had accepted responsibility for his actions and had agreed to an appropriate penalty which provided for specific and general deterrence, rehabilitation and monitoring.

Order

The Discipline Panel imposed an order:

 Requiring the Member to appear before the Panel to be reprimanded immediately following the hearing of this matter.

- Directing the Registrar to suspend the Member's certificate of registration for a period of six months, three months of which shall be remitted if the Member complies with the provisions of paragraphs 3(a) through 3(c) no later than September 30, 2019.
- 3. Directing the Registrar to impose the following specified terms, conditions and limitations on the Member's certificate of registration:
 - Requiring that the Member successfully complete by November 30, 2019 the PROBE course in ethics and boundaries;
 - Requiring that the Member successfully complete by November 30, 2019 the Medical Records Course at the University of Toronto;
 - c. Requiring that the Member successfully complete by November 30, 2019 the IPAC Core Competencies program provided by Public Health Ontario;
 - Requiring that the Member write an essay between 1,000–1,500 words in length, and provide it to the Registrar, no later than December 20, 2019, on the following issues:
 - i. The lessons he learned in completing the terms, conditions, and limitations described in paragraphs 3(a) through (c); and
 - ii. The methods he will incorporate into his practice to ensure proper infection control, including but not limited to his provision of IVIT.
- 4. For greater certainty, the obligation to comply with the proposed terms, conditions and limitations on the Member's certificate of registration contained in paragraph 3(a) and 3(c) is not relieved by serving the entire suspension referred to in paragraph 2 above.
- Requiring the Member to pay the fine of not more than \$350 to the Minister of Finance within two months of the date of the hearing.
- 6. Requiring the Member to pay the College's costs fixed in the amount of \$3,500 payable in a schedule determined by the Registrar.

The Panel concluded that the proposed penalty was reasonable and in the public interest, and that it satisfied the principle of public protection.

Dr. Salfe Anne Elizalde, ND

Registration #3081 Hearing Date: November 6, 2019

Summary of Allegations:

- Issuing an invoice, bill or receipt that the Member knows or ought to know is false or misleading.
- Signing or issuing, in her professional capacity, a document that the Member knows or ought to know contains a false or misleading statement.
- Failing to keep records in accordance with the standards of the profession.
- Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by Members as disgraceful, dishonourable or unprofessional.

The Agreed Statement of Facts had been agreed on before the hearing. The Discipline Panel found that the Member committed acts of professional misconduct as admitted by the Member.

Admission of Professional Misconduct

A Joint Submission as to Penalty and Costs had been agreed upon prior to the hearing. The parties submitted that the public was protected because the Member had accepted responsibility for his actions and had agreed to an appropriate penalty which provided for specific and general deterrence, rehabilitation and monitoring.

Order

The Discipline Panel imposed an order:

- Requiring the Member to appear before the Panel to be reprimanded immediately following the hearing of this matter.
- 2. Directing the Registrar to suspend the Member's certificate of registration for a period of five months,

two months of which shall be remitted if the Member complies with the provisions of paragraphs 3(a) through 3(d) no later than January 31, 2020.

- Directing the Registrar to impose the following specified terms, conditions and limitations on the Member's certificate of registration:
 - Requiring that the Member unconditionally pass the PROBE ethics course, which is to be taken at her own expense, no later than February 29, 2020;
 - Requiring that the Member successfully complete the College Jurisprudence Course no later than February 29, 2020;
 - Requiring that the Member successfully complete a medical records course, approved by the Registrar, no later than February 29, 2020;
 - Requiring that the Member write an essay between 1,000 and 1,500 words in length, and provide it to the Registrar no later than February 29, 2020 on the following issue:
 - i. The lessons she learned in completing the PROBE, College Jurisprudence and medical records courses.
- Requiring the Member to pay the fine of not more than \$350 to the Minister of Finance within one month of the date of the Order.
- 5. Requiring the Member to pay the College's costs fixed in the amount of \$4,000 payable within 30 days of the date of the hearing or on a schedule determined by the Registrar.

The Panel concluded that the proposed penalty was reasonable and in the public interest, and that it satisfied the principle of public protection.

Holding the College Accountable

As a health regulator, the College is accountable to a number of organisations and agencies, including:

- the Minister of Health, who is responsible for overseeing the regulation of health professions in Ontario;
- the Health Professions Appeal and Review Board;
- · the Office of the Fairness Commissioner;
- the Human Rights Tribunal of Ontario; and
- the Courts.

Ministry of Health

The College has maintained a positive relationship with the Ministry of Health. Ministry staff remain an important part of the process to appoint public members to our governing Council.

In the 2019–2020 reporting period:

Public member Scott Sawler resigned from the Council on June 10, 2019 and the College Council welcomed two new public members Lisa Fenton and Dean Catherwood on May 16, 2020 and January 31, 2020, respectively. Public members of Council are appointed by Ontario's Lieutenant Governor.

Health Professions Appeal and Review Board (HPARB)

While the role of the College is to hold its Members accountable for their conduct, the HPARB does the same for the College. The Board is an independent body established by provincial legislation.

The HPARB has jurisdiction over appeals relating to registration decisions made by the Registration Committee or decisions surrounding complaints reviewed by the Inquiries, Complains and Reports Committee. Its role is to ensure their processes are fair and objective to all parties and that outcomes are appropriate to the circumstances of the matter that was considered.

Registration Decisions

When an application for registration is referred to the Registration Committee for consideration, the Committee has a set of outcomes that it can apply. They include:

- directing the Registrar to issue a certificate of registration;
- directing the Registrar to issue a certificate of registration after the applicant has completed additional education, training or examinations;
- directing the Registrar to issue a certificate of registration with terms, conditions or limitations applied to it; or

• denying the application and refusing to issue a certificate of registration.

All of these decisions of the Registration Committee, with the exception of a decision to direct the Registrar to issue a certificate of registration, can be appealed to HPARB.



Complaint Decisions

Either party to a complaint can ask for a review of the ICRC's decision by the HPARB within 30 days of receipt of the ICRC's decision. When the ICRC is considering a complaint that has been made to the College, it has a set number of decisions that it can make, including to:

- take no further action, if it finds there is insufficient evidence to support the allegations;
- issue a Letter of Counsel;
- require the Member to complete a specified continuing education or remediation program;
- require the Member to appear before a panel of the ICRC to be cautioned;
- accept the Member's undertaking to improve his or her practice or to restrict his or her practice;
- accept an undertaking from the Member to resign and to never apply or re-apply for registration as a naturopathic doctor in Ontario;
- refer specified allegations of professional misconduct or incompetence to the Discipline Committee; and

 refer the matter to another panel of the ICRC for incapacity proceedings if there are concerns suggesting that the member is suffering from a physical or mental incapacity.

	2018–19	2019–20
Appealable ICRC decisions	25	17
Decisions appealed	-	4
Outcomes	1*	-

* In this matter, HPARB decided not to proceed with a review of the ICRC decision

HPARB also received an application seeking relief from a Member of the College who felt the delay in an ICRC investigation was unsatisfactory. HPARB dismissed this application and took no further action.

Office of the Fairness Commissioner of Ontario

The Office of the Fairness Commissioner of Ontario (OFC) oversees the registration practices of the health regulatory colleges and other regulators to ensure that they are fair, objective, impartial and transparent.

Our College received the outcome of the OFC's recent Registration Practices Audit. The report found that the information we made available for applicants, in particular those applying through the Prior Learning Assessment and Recognition Program, was lacking.

We take this report and the role of the OFC very seriously. As a result of the report, an action plan was developed and the College is in the process of implementing the recommendations.

Human Rights Tribunal of Ontario

The College is indirectly accountable to the Human Rights Tribunal of Ontario (HRTO) to ensure that its processes do not discriminate against or harass any persons with whom The College is indirectly accountable to the Human Rights Tribunal of Ontario (HRTO) to ensure that its processes do not discriminate against or harass any persons with whom the College may interact. The HRTO resolves claims of discrimination and harassment brought under the *Human Rights Code*.

In 2019, a College Member filed a claim against the College with the HRTO alleging that they were discriminated by the College as a result of a complaint filed against the Member and the Decision of the Inquiries, Complaints and Reports Committee directing that the Member successfully complete an ethics course. The claim is being reviewed by the HRTO.

The Courts

Individuals interacting with the College may choose to seek relief from the Courts. For example, if a Member is unhappy with a decision of the Discipline Committee, it can be automatically appealed to the Ontario Superior Court of Justice—Divisional Court (the Divisional Court is a branch of the Superior Court of Justice). If a Member or applicant is concerned that the College discharged a statutory duty (e.g., made a decision that they are authorised to make via legislation), but in an unfair matter (e.g., did not provide notice of a complaint, made a decision while in a conflict of interest), they may seek a judicial review before the Divisional Court.

However, Members, applicants or persons cannot sue the College (in small claims court or the Ontario Superior Court of Justice) unless they demonstrate that the College discharged a duty in bad faith. This is as a result of s. 38 of the *Regulated Health Professions Act*.

In the past year, the College has had no matters taken before the Courts.

Communications



Communications supports the regulation of naturopathy. The College provides information to help patients make informed choices about their care and lets the public know how we can help if they have concerns about the behaviour or practice of a naturopath. At the same time, we keep naturopaths informed of current requirements to protect the public so they can apply these to their practices.

Engagement

Citizen Advisory Group (CAG)—We led a partnership with three other CAG partner regulators to explore patient and caregiver input about their perceptions to do with advertising by regulated health professionals. The results helped us shape our communications with Members about this important topic.

Advisory Group members were also surveyed as part of the consultative process for Council's Governance Review. CAG Members were asked about their views on numerous governance-related topics ranging from the ideal size for a governing Council/Board to how Council/Board members should be selected, to what kinds of activities performed by naturopaths might present high versus lower risks to patients. The results were added to the materials reviewed by the Council in considering governance options it might want to adopt.

CVID-RELATED SUPPORT

public statement on advertising

all-member e-mails

Stakeholder meetings

Canadian Association of Naturopathic Doctors (CAND)

4

Ontario Association of Naturopathic Doctors (OAND)

2

Canadian Alliance of Naturopathic Regulatory Authorities (CANRA)

5

Naturopathic Students Association (NSA - CCNM)

3

Canadian College of Naturopathic Medicine (CCNM)

6

Regulatory Communicators' Network

OAND Annual Convention

1-on-1

CONTACT WITH +/- 60 MEMBERS AND OTHER STAKEHOLDERS AT THE BOOTH.

27 DOCUMENTS TRANSLATED INTO FRENCH



Online Communications

Readership rates well above the industry norm

All-member e-mails

iNformeD newsletters



News Bulletin e-newsletters

13

blog posts for 835 total unique pageviews

Website 453,976 unique pageviews



Home page Public Register Public Register Overview

Support to College Programs & Activities

- Governance Review
- Ongoing Communications counsel
- Media relations & issue management
- Registration renewal
- Writing & editing: newsletters, web content, annual report, surveys, infographhics, other publications
- New ETP exam launch
- Volunteer recruitment

The Public Register:

Information about all Ontario naturopaths

This <u>four-part online directory</u> is an important source of information for the public, profession, and stakeholders about naturopaths who are registered to practise in Ontario. It also includes the names of people who claim to be naturopaths, but are not. The Register is updated in real-time.

- The <u>Naturopathic Doctor Register</u> contains detailed information about all naturopaths registered with the College, including their registration type and status, practice information, and whether they have met the requirements to provide certain additional services.
- 2. The <u>Professional Corporations Register</u> contains information about a type of corporation where a naturopath owns shares and is a director.
- 3. The <u>Intravenous Infusion Therapy (IVIT) Premises Register</u> identifies clinics where IVIT is offered, including whether a premises is registered with the College and authorised to provide IVIT at that location.
- 4. The <u>Unauthorized Practitioner Register</u> lists people who are not registered with the College but who refer to and/or present themselves as naturopaths. Holding themselves out to be a regulated health professional is illegal.

Summary Financial Statements

Independent Auditors' Report

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of The College of Naturopaths of Ontario, which comprise the statement of financial position as at March 31, 2020, and the statements of operations and changes in net assets and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of The College of Naturopaths of Ontario as at March 31, 2020, and the results of its operations and its cash flows for the year then ended, in accordance with Canadian accounting standards for not-for-profit organizations.

Basis for Opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of The College of Naturopaths of Ontario in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Canadian accounting standards for not-for-profit organizations, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the College's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the College or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the College's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the College's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the College's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the College to cease to continue as a going concern.

• Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Kriens-Larose, LLP Chartered Professional Accountants Licensed Public Accountants

Toronto, Ontario July 29, 2020

NOTE TO SUMMARY FINANCIAL STATEMENTS

Our website includes an explanatory <u>Statement on Financial Results</u> to provide readers with overall context about the favourable outcome of the College's financial position at the end of the 2019–20 fiscal year.

The summary financial statements have been prepared from the audited financial statements of the College for the year ending March 31, 2020. The information in the summary financial statements <u>is in</u> <u>agreement</u> with the related information in the complete financial statements and contains the necessary information to avoid distorting or obscuring matters disclosed in the related complete financial statements.

<u>Complete audited financial statements</u> are available on the College website and may also be obtained by e-mailing us at <u>general@collegeofnaturopaths.on.ca</u>.

Summary Statement of Financial Position

As at March 31, 2020

ASSETS	2020 \$	2019 \$
CURRENT		
Cash and cash equivalent (Note 3)	3,996,624	4,605,778
Accounts receivable (Note 5)	933,424	191,357
HST receivable	_	9,007
Prepaid expenses	55,620	83,681
	4,985,668	4,889,823
EQUIPMENT (Note 4)	54,495	26,632
	5,040,163	4,916,455

LIABILITIES

JRRENT Accounts payable and accrued liabilities Deferred revenue (Note 5) HST payable	579,597 1,521,221 306,870	134,327 2,413,129 –			
				2,407,688	2,547,45

NET ASSETS (NOTE 6)		
Unrestricted net assets	2,467,386	2,199,504
Patient relations	89,704	94,110
Strategic initiatives	75,385	75,385
	2,632,475	2,368,999
	5,040,163	4,916,455

Summary Statement of Operations and Changes in Net Assets

For the year ended March 31, 2020

REVENUES	2020 \$	2019 \$
Registration and member renewal fees	2,555,036	2,426,324
Examination fees	305,775	160,805
Inspection and hearing fees	82,050	223,900
Interest	45,253	40,377
Incorporation fees	18,650	17,3500
TOTAL REVENUES	2,868,756	2,626,112
EXPENSES		
Salaries and benefits	1,366,521	1,141,723
Rent and utilities	269,879	264,196
Exam fees and expenses	127,989	112,473
Office and general	99,162	121,972
Consulting fees		
Consultants - General	115,772	118,359
Consultants - Assessors/inspectors	32,418	60,770
Consultants - Complaints and inquiries	77,276	94,777
Legal fees		
Legal fees - Complaints	81,696	50,636
Legal fees - Discipline	87,427	86,135
Legal fees - General	67,766	61,521
Council fees and expenses	84,613	71,032
License	81,051	49,282
Public education	74,009	82,744
Equipment maintenance	35,022	31,177
Insurance	27,426	26,773
Travel accommodation & meals	24,736	31,850
Amortization	19,194	12,918
Audit fees	17,002	15,980
Website	16,837	-
Translation	16,233	967
Printing and postage	10,927	6,153
Education and training	7,389	8,715
Discipline & FTP committee	2,193	14,610
Patient relations committee	750	9,624
TOTAL EXPENSES	2,743,288	2,474,387
EXCESS OF REVENUES OVER EXPENSES FOR THE YEAR	263,476	394,369
NET ASSETS, BEGINNING OF YEAR	2,368,999	1,974,630
NET ASSETS, END OF YEAR	2,632,475	2,368,999
Allocated to:		
Unrestricted net assets	2,467,386	2,199,504
Patient relations	89,704	94,110
Strategic initiatives	75,385	75,385
	2,632,475	2,368,999

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Thank you volunteers!

Did you know that volunteers contribute at least 40,000 hours of their time each year to support the College and the regulation of the profession?

We hold more than 60 meetings each year. In addition to the naturopaths and members of the public who volunteer on our statutory and non-statutory committees, another 80 plus Members of the profession serve as assessors (Quality Assurance, Prior Learning Assessment and Recognition Program), examiners, IVIT Inspectors and exam item writers and developers, often dedicating full days of work to their roles.

EXAMS RELATED ROLE

Melvia Agbeko, ND Noor Al Kuraishi, ND Pearl Arjomand, ND Kinga Babicki-Farrugia, ND Deborah Berg, ND Katelyn Butler-Birmingham, ND Stephen Buzzelli, ND Christina Carew, ND Andrew Chelladurai, ND Natalie Cheng-Kai-On, ND Kendra Clifford, ND lan Cole, ND Jackie Colello, ND Dylan Coombs, ND Rachel Corradetti-Sargeant, ND Katrina Cox, ND Salma El Kassaby, ND Valerie Franc, ND Janna Fung, ND Alaina Gair, ND Cyndi Gilbert, ND

Sarah Giovinazzo, ND Adam Gratton, ND Quinn Hand, ND Suki Hon, ND Nicole Hwang, ND Albert larz, ND Jeanny Kim, ND Vivian Kwan, ND Carol Laic, ND Olivia Leung, ND Vivian Liang, ND Lena Ma, ND Natalie McCulloch, ND Emily Murphy, ND Rick Olazabal, ND Erin Psota, ND Lynn Racette, ND Chris Roberts, ND Emily Rotella, ND Rupa Salwan, ND Laure Sbeit, ND Rachel Schwartzman, ND Kitty Shang, ND Ruchira Shetty, ND

While they are not identified by name, we also acknowledge the naturopaths we contact from timeto-time to provide us with informal feedback about College documents we create for the profession, such as information sheets and infographics. We seek their input to help ensure the content of these publications make sense from an ND's point of view.

Awet Sium, ND Lisa Smith, ND Lara Spector, ND Laura Stix, ND Somphorn Thammasouk, ND Anna Tournianski, ND Erin Truscott-Brock, ND Selene Wilkinson, ND Maria Wong, ND

IVIT PREMISES INSPECTORS

Pearl Arjomand, ND Deborah Berg, ND Jacqueline Colello, ND Meera Dossa, ND Julia Esposito, ND Jason Law, ND Kandis Lock, ND Maureen MacDonald, ND Michael Reid, ND Orest Szczurko, ND

PEER AND PRACTICE ASSESSORS

Nadia Bakir, ND Sharon Behrendt, ND Emile Compan, ND Michelle Richea, ND Mary-Claire Seitz, ND

PLAR ASSESSORS

Michelle Richea, ND Vaishna Sathiamoorthy, ND Noor Al Kuraishi, ND

PLAR ASSESSORS (PAPER-BASED)

Michelle Richea, ND Vaishna Sathiamoorthy, ND

PLAR WORKING GROUP

Melvia Agbeko, ND Kimberlee Blyden-Taylor, ND Paymon Saldrolsadot, ND Zeynep Uraz, ND Alan Vu, ND

College committees

Our governing Council is supported by two types of committees: statutory and non-statutory. These committees are made up of naturopaths and public members who serve on Council as well as Members of the profession who are appointed by Council. Appointments are for a one-year term with the option of renewal and all positions are volunteer.

The following individuals served on the College's Committees for all or part of the fiscal year 2019–20.

Statutory Committees

These committees are required by statute, namely the Regulated Health Professions Act, 1991. These Committees include:

- Discipline Committee (DC)
- Executive Committee (EC)
- Fitness to Practise Committee (FTP)
- Inquiries Complaints and Reports Committee (ICRC)
- Patient Relations Committee (PRC)
- Quality Assurance Committee (QAC)
- Registration Committee (RC)

Statutory Committee reports from the fiscal year are available on our website.

Faisal Allie, ND-ICRC Kim Bretz, ND-EC (Chair), ICRC Shelley Burns, ND-DC, EC, PRC (Chair), RC Glenda Clark, ND (Ret.)—ICRC Dianne Delany—DC Lisa Fenton—DC, RC Tara Gignac, ND-DC, EC, QAC R. Gail Goodman—DC, RC Rosemary Hnatiuk, ND-QAC, RC Samuel Laldin—DC, EC, PRC Brenda Lessard-Rhead, ND (Inactive)—ICRC Sylvi Martin, ND—ICRC Anthony Moscar, ND—PRC

Danielle O'Connor, ND-DC, PRC, RC (Chair) Enrique Olazabal, ND-DC Erin Psota, ND—ICRC (Chair) Dielle Raymond, ND-QAC Elena Rossi, ND-QAC Vaishna Sathiamoorthy, ND-ICRC Scott Sawler-DC. RC Laure Sbeit, ND-DC Jacob Scheer, ND-DC. RC Jordan Sokoloski, ND-DC (Chair), QAC Barry Sullivan-EC, ICRC, QAC (Chair) George Tardik, ND-DC, RC

Non-statutory Committees

These committees are not required by law but are created and deleted authority by the Council to perform specific functions. Non-statutory Committees include:

- Audit Committee (AC)
- Examination Appeals Committee (EAC)
- Inspection Committee (IC)
- Nominations and Elections Committee (NEC)
- Scheduled Substances Review Committee (SSRC)

Sean Armstrong, ND-IC (Chair) Kim Bretz, ND—SSRC Dianne Delany-NEC J. J. Dugoua, ND-SSRC Madeleine Elton, ND-SSRC Tara Gignac, ND—IC R. Gail Goodman—NEC, SSRC Rosemary Hnatiuk, ND-IC Samuel Laldin—IC Brenda Lessard-Rhead, ND (Inactive)-NEC Rick Olazabal, ND—SSRC Elena Rossi, ND-AC (Chair) Vaishna Sathiamoorthy, ND-EAC Jordan Sokoloski, ND-AC George Tardik, ND-EAC (Chair), SSRC (Chair) Gudrun Welder, ND-NEC



College Staff

Our staff* support the Registrar and CEO to carry out the operational work of the College.

Daniella Abate Coordinator, Professional Practice

Sahrish Ali Senior Coordinator, Registration and Examinations

Victoria Calozet Administrative Assistant, Communications

lan D'Costa Content Writer

Judith Fiore ND, Practice Advisor

Anum Jamal Examination Coordinator

Maryam Katozian Membership Coordinator

Agnes Kupny Director, Operations

Erica Laugalys Director, Registration and Examinations

Tuyen Le Examination Coordinator

Rebecca McBride Coordinator, Professional Conduct

Mary-Ellen McKenna ND (Inactive), Manager, Professional Practice

Syed Mehdi Finance and Administrative Officer

Andrew Parr CAE, Registrar & CEO

Joseph Quao Administrative Assistant, Regulatory Programs

Jeremy Quesnelle Deputy Registrar

Natalia Vasilyeva Manager, Professional Conduct

Margot White Director, Communications and Lead, Community Engagement

Monika Zingaro Administrative Assistant, Operations

*as of September 1, 2020

The College of Naturopaths of Ontario - Annual Report 2019/20

The College of Naturopaths of Ontario is the regulatory authority governing naturopaths in Ontario. Its primary mandate is to serve the public interest by enhancing safety for patients using naturopaths. The College meets its mandate by ensuring that individuals wishing to be naturopaths in Ontario meet the entry-to-practise requirements, by ensuring practising naturopaths maintain their competency, by establishing and maintaining standards of practice in Ontario and by holding naturopaths accountable through the complaints and disciplinary processes.

> 150 John Street, 10th floor Toronto, Ontario M5V 3E3

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general@collegeofnaturopaths.on.ca www.collegeofnaturopaths.on.ca



The College of Naturopaths of Ontario