



The College of Naturopaths of Ontario

**Proposed Amendments to the by-laws  
of the  
College of Naturopaths of Ontario**

**January 2021**

The following are proposed amendments to Schedule 3 of the By-laws of the College of Naturopaths of Ontario. These changes are being circulated for consultation purposes pursuant to the Health Professions Procedural Code, which is Schedule 2 of the *Regulated Health Professions Act, 1991*.

**Background**

In March 2017, Part IV of the General Regulation came into effect authorizing the College to operate an inspection program for all premises where Registrants perform one or both of administering intravenous infusion therapy (IVIT) or compounding for the purposes of IVIT.

The Inspection Program of the College supports continuous quality improvement through the development and maintenance of standards for all premises in which compounding for and/or administration of IVIT are performed. The College recognizes the importance of maintaining competency for certain procedures that are associated with an increased risk and has developed the Inspection Program to ensure the safety and quality of care for the people of Ontario who choose to access these services.

The structure of the program is to inspect premises where compounding for and/or administration of IVIT are performed to ensure that the Inspection Program Requirements, as well as standards, policies and procedures are in place and are being practised by Registrants within the premises.

Consideration of changes to the inspection fees has been included as part of the scheduled review of the Inspection Program. The inspection fee is based on a cost recovery<sup>1</sup> basis for all premises undergoing an inspection prior to being authorized to perform IVIT procedures and subsequently, once every 5 years.

The College's inspection program costs include:

- per diems for inspectors to prepare for, conduct the inspections and draft an inspection report,
- travel, meals and accommodation expenses for inspectors when conducting an inspection, and when attending mandatory training,
- per diems for Inspection Committee members,
- travel, meals and accommodation expenses for Inspection Committee members when attending meetings and training,
- development and delivery of training for Committee members and inspectors,

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<sup>1</sup> Cost recovery is defined as the principle of recovering business expenditures related to an activity.

- postage and printing,
- legal fees, and
- salaries and benefits for staff required to administer the program.

The proposed changes are indicated in the table below as follows:

~~Deletion~~      Addition

Current Provision	Proposed Change	Rationale/Explanation
Regularly Scheduled 5-year Inspection \$2,500 (payable within 30 days of the date of the invoice)	Regularly Scheduled 5-year Inspection <del>\$2,500</del> <ul style="list-style-type: none"> <li>• \$2,000 (payable within 30 days of the date of the invoice)</li> </ul>	Actual costs incurred since the Inspection Program began in March 2017 have been reviewed and a reduction in the inspection fee for a scheduled 5-year inspection is being proposed.
<i>All existing premises required to be inspected within 24 months of the date Part IV of O. Reg 168/15 comes into effect will be invoiced in two equal payments of \$1,250 approximately one year apart within the initial 24-month period.</i>	<del><i>All existing premises required to be inspected within 24 months of the date Part IV of O. Reg 168/15 comes into effect will be invoiced in two equal payments of \$1,250 approximately one year apart within the initial 24-month period.</i></del>	Not longer applicable, as the 24-month period has passed.
Inspection ordered by the Inspection Committee \$2,500 (payable within 30 days of the date of the invoice)	Inspection ordered by the Inspection Committee <del>\$2,500</del> <ul style="list-style-type: none"> <li>• \$2,000 (payable within 30 days of the date of the invoice)</li> </ul>	Actual costs incurred since the Inspection Program began in March 2017 have been reviewed and a reduction in the inspection fee for an ordered inspection is being proposed.
Inspection of a new premises <ul style="list-style-type: none"> <li>• Part I \$1,250 (payable within 30 days of the date of the invoice)</li> </ul>	Inspection of a new premises <ul style="list-style-type: none"> <li>• <del>Part I \$1,250</del> \$2,500 (payable within 30 days of the date of the invoice)</li> </ul>	Actual costs incurred since the Inspection Program began in March 2017 indicate that the \$2,500 fee is appropriate. The inspection of a new premises is conducted in two parts, incurring additional expenses. The new premises fee will be invoiced when notified it has been selected for the initial inspection.
<ul style="list-style-type: none"> <li>• Part II \$1,250 (payable within 30 days of the date of the invoice)</li> </ul>	<ul style="list-style-type: none"> <li>• Part II \$1,250 (payable within 30 days of the date of the invoice)</li> </ul> <i>Applicable to premises invoiced for Part I at \$1,250 prior to [date changes come into effect]</i>	Ensures that premises that have been invoiced for their Part I inspection at \$1,250, prior to the date the new fee schedule comes into effect, can be invoiced for their Part II inspection at \$1,250.

NA	Registration fee \$100.00	The registration fee of \$100 is payable at the time a premise submits the form to register as a new IVIT premises. If a premise chooses to cancel their registration, the fee is non-refundable. For a premise that undergoes a Part I inspection, the \$100 fee will be applied to the new premise inspection fee. The fee addresses the costs incurred by the College when processing the registration of a new premises.
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**Consultation Timing**

The consultation begins on January 8, 2021. All submissions must be received no later than the end of business day (5:00 p.m.) on March 9, 2021.

**Send your feedback**

Any questions or comments about the Inspection Program Fees and proposed changes should be directed to the Manager of Professional Practice at: [maryellen.mckenna@collegeofnaturopaths.on.ca](mailto:maryellen.mckenna@collegeofnaturopaths.on.ca)