

Fair Registration Practices Report

Naturopaths (2015)

The answers seen below were submitted to the OFC by the regulated professions.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions and Compulsory Trades Act (FARPACTA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPACTA
- the Health Professions Procedural Code set out in Schedule 2 of the Regulated Health Professions Act (RHPA) s. 22.7 (1) and 22.9(1), for health colleges.

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1. Provision of Information About Registration Practices

Describe how you make information about registration practices available to individuals applying or intending to apply for registration. Specify the tools used to provide information, and the manner in which you make that information available, current, accurate and user friendly in each of these subcategories:

a) steps to initiate the registration process

Applicants to the College of Naturopaths of Ontario are either graduates of the CNME-accredited program, naturopaths practising in another regulated Canadian province, or individuals who obtained their education outside of a CNME-accredited program.

To initiate the registration process the College of Naturopaths of Ontario:

1) provides applicants with the following:

- Registration checklist of required documents
- Applications for Registration Handbook
- College Steps in the Registration Process (overview and specific information pertaining to each step) and Registration Process Flow Chart available via the website
- Contact List of College staff

2) makes an annual presentation in-person to the graduating classes of the Canadian College of Naturopathic Medicine which includes a student Q&A period

b) requirements for registration

Since proclamation of the Naturopathy Act, 2007 in July 2015, the College has worked to streamline its 3-step process for applying for a certificate of registration: pre-registration, application, and issuance of a certificate of registration. Information on each of these registration steps is detailed in full, and readily available to individuals from the College's website (under the "Become a ND" tab) and/or by corresponding directly with Registration staff, either by telephone or email.

The 'Become a ND' tab provides an overview on registration to explain overall processes and each applicant category (i.e. graduated from a CNME-accredited program or PLAR, graduated from a CNME-accredited program over 2 years ago, or registering as an inter-provincial transfer under the AIT), provides specific links for each applicant category to provide comprehensive information and supplemental materials (e.g. handbooks both for Registration and the entry-to-practice Clinical examinations, available under the 'Resources' tab of the College website), Examination Schedules, Guides and forms to help provide a clear understanding for each applicant of their specific process for registration.

The College's registration requirements set out in Regulation 84/14 under the *Naturopathy Act, 2007* have also been broken out into policies (posted under the 'Members' tab) to provide ease of understanding and additional information around registration, examinations, and any options for meeting the regulatory requirements.

The website is managed in-house which allows changes to be made to content in a timely manner. College staff regularly reviews website content to ensure the information is current and accurate and updates are made when staff becomes aware of any lack of clarity or conflict in information on requirements or process. A video series for members and applicants has also been recorded and posted, and includes the topic of registration (including PLAR).

c) explanation of how the requirements for registration are to be met, such as the number of years of schooling required for a degree to be deemed equivalent to an Ontario undergraduate degree, length and type of work experience, credit hours or program content

Information on requirements for registration are provided by the College:

- 1) in person presentation to the 4th year grads of the Canadian College of Naturopathic Medicine;
- 2) online on the College of Naturopaths of Ontario website under "Become a ND>Registration Overview" and under "Become a ND>PLAR Overview" (including a video overview);
- 3) by phone and email;

Applicants from other Canadian jurisdictions where naturopathy is regulated may contact the College for additional information about labour mobility under the Agreement on Internal Trade (AIT) and required registration documentation (e.g. obtaining a Letter of Good Standing from their current regulatory authority). The College provides information on labour mobility on its website and in supporting documentation (e.g. Applications for Registration Handbook, Application for Pre-Registration form, and in the the Application for Registration).

Explanations may also be given by phone, email, and via regular mail correspondence.

d) any education or practical experience required for registration that must be completed in Ontario or practice that must be supervised by a member of the profession who is registered in Ontario

Applicants are not required to complete Ontario-specific education or supervised practice to be eligible for registration with the College.

e) requirements that may be satisfied through acceptable alternatives

Eligibility for registration as a naturopath in Ontario outside of the CNME-accredited programs is clearly explained online on the College of Naturopaths of Ontario website under "Become a ND>PLAR>PLAR Overview."

An applicant who wishes to apply using requirements other than those stipulated under the PLAR program (or those noted under the Registration Overview) must contact the College. Contact information appears on the "About the College>Contact Us" page.

f) the steps in the assessment process

The registration application process and the steps involved for all applicants are clearly outlined:

1) Online on the College of Naturopaths of Ontario website under "Become a ND>Register>Registration Overview" and "Become a ND>PLAR>PLAR Overview". Information for applicants appears front and centre on the College's website homepage with links to the relevant sections of the website;

2) by phone, and email;

3) via College program policies (e.g. Registration Program policy) and supporting documentation (e.g. Applications Handbook), also available via the College website.

College staff review website information regularly to ensure that all information is up-to-date, accurate, and easy to understand.

Exam candidates are provided with information outlining next steps as they move through the examination process. For example, applicants who complete the College Clinical Examinations receive not only their exam results but information on how to proceed in the registration process.

g) the documentation of qualifications that must accompany each application; indicate which documents, if any, are required only from internationally trained applicants

PLAR applicants must submit official diplomas and transcripts to a College-approved credential evaluation agency. This third-party agency confirms the authenticity of the documents, as well as verifying the program, year of study, issuing institution, and primary language of instruction. If the education was completed outside of Canada, the education (in any field) is also assessed to determine whether it is equivalent/comparable to an undergraduate degree obtained at a Canadian institution. In addition, a Document of Education and Experience (DEE) is required to be submitted by the applicant to determine whether the applicant's combination of knowledge and experience is equivalent to that of an individual who has successfully completed a CNME-accredited program.

The Document of Education and Experience (DEE) Applicant Guide available in the Resources section of the College website, outlines the specific documents which must accompany the DEE form such as Academic Record / Transcripts / Mark sheets / Records, for which a copy may be submitted if it is notarized by a notary public. If documents are not available in English or French, materials translated by a certified translator are acceptable. In addition, documents to support details of the completed curriculum are requested and may be provided as photocopies from a variety of sources.

Non-PLAR applicants are required to arrange for their CNME-accredited program transcript and NPLEX examination results to be provided to the College. These requirements are outlined in the Applicant Checklist available under "Resources>Handbooks, Tools and Forms> Registration" on the College website.

h) acceptable alternatives to the documentation if applicants cannot obtain the required documentation for reasons beyond their control

Currently there are no alternatives to the documentation requirements for registration with the College of Naturopaths of Ontario. An applicant who has questions about documentation requirements may contact the College via the College website under "About the College>Contact Us." Contact information, both email and direct phone numbers, are provided for each department. Although acceptable alternatives are not currently outlined for all document requirements, the College would consider each case if an applicant were unable to obtain the required documentation for reasons beyond their control. A variety of sources for supporting documentation is outlined for PLAR applicants completing the Documentation of Education and Experience form in the Applicant Guide.

i) how applicants can contact your organization

Applicants can contact the College by mail, phone or e-mail. This information is posted on the website.

Mailing Address

The College of Naturopaths of Ontario
150 John Street, 10th Floor
Toronto, ON M5V 3E3

General Inquiries

Telephone: 416.583.6010 Facsimile: 416.583.6011 or E-mail: info@collegeofnaturopaths.on.ca

Examination Inquiries:

416.583.6016 or exams@collegeofnaturopaths.on.ca

Registration Inquiries:

416.583.6017 or registration@collegeofnaturopaths.on.ca

Hours of Operation: Monday to Friday, 9:00 am to 5:00 pm, excluding public holidays.

j) how, why and how often your organization initiates communication with applicants about their applications

How and why the College of Naturopaths of Ontario initiates communication with applicants about their applications is clearly outlined in the Applications for Registration Handbook, available on the College website under "Resources>Handbooks, Tools and Forms> Registration". Processing timelines for each step of the registration process are outlined by clicking on the applicable step under "Become a ND>Registration Overview"

The College will initiate communication with applicants in order to obtain outstanding supporting documentation, to clarify information provided, to provide direction on how to correctly complete the application form and/or to advise of fees available for payment. Following processing of step 2, the application for registration, applicants receive an email from the College informing them of their eligibility for registration and moving them into step 3, including providing information on how to complete the final steps for issuance of a certificate of registration.

The College contacts applicants at any time during the process if it has been determined that additional information is required to enable the applicant to demonstrate that they meet the entry-to-practice requirements outlined in the Registration Regulation. Applicants are informed of what may be provided to illustrate having met the requirements. If the Registrar refers an application to the Registration Committee in accordance with section 15(2) of the Health Professions Procedure Code (the Code), the applicant receives formal notification of the referral and is provided with an opportunity to make written submissions pursuant to section 15(3) of the Code.

To ensure timelines are being met by College staff, and to identify areas where additional streamlining of the process could be implemented, applications for registration are tracked from submission of Step 1: the application for pre-registration, and audited on a quarterly basis.

Additional strategies to implement and provide applicants with regular status updates on their application are presently being reviewed.

k) the process for dealing with documents provided in languages other than English or French

Applicants are required to provide certified translations of any and all materials not written in either official language, at their own expense.

To ensure that translations have not been modified in any way, translations must be sent directly from the certified translator to the College.

Translations must be performed by qualified professionals who are certified by a government organization, such as Association of Translators and Interpreters of Ontario or a translator who has been certified by a Member organization of the International Federation of Translators (<http://www.fitift.org/>).

Information regarding College-recognized third-party translation organizations, is available to applicants on the College website under "Become a ND>PLAR>Initiating PLAR" under "3. Language Proficiency."

l) the role of third-party organizations, such as qualification assessment agencies, organizations that conduct examinations or institutions that provide bridging programs, that applicants may come into contact with during the registration process

To be deemed eligible for registration, all applicants are required to complete a Clinical Sciences and Acupuncture elective examinations conducted by the North American Board of Naturopathic Examiners (an independent, nonprofit organization who serves North American naturopathic regulatory bodies).

PLAR applicants (international and non-CNME accredited), will also come into contact with one (or more) College-approved credential evaluation agencies and potentially a College-approved language assessment agency as part of the initial assessment process.

Information about these organizations is made available to applicants via the College's website in the "Become a ND>Examinations" and "Become a ND>PLAR" sections.

m) any timelines, deadlines or time limits that applicants will be subject to during the registration process

All important timelines, deadlines, and time limits are communicated to all applicants on the College website, in the Applications for Registration Handbook, on the website Examinations Schedule, and in the Clinical Examinations Handbook.

Timelines and deadlines are also reinforced through telephone and email contacts that occur between applicants and registration staff throughout the process.

Certain time limits are outlined in the Registration Regulation based on ensuring currency of an applicant's skills such that an applicant must apply for registration within a two year timeframe of having completed the education program and examinations required for entry-to-practice. Work is ongoing to better assist applicants in understanding the timeframes outlined in the Registration Regulation.

An applicant has two (2) years or three (3) opportunities, whichever comes first, to successfully pass the entry-to-practise examinations.

Additional information regarding timelines around requesting an examination accommodation, applying for registration, expiry of documentation (e.g. criminal record checks), and/or appealing an exam result are readily available to all applicants via the website and in the above mentioned handbooks.

n) the amount of time that the registration process usually takes

Between July 1, 2015 and December 15, 2015, the College of Naturopaths of Ontario took an average of 15.6 days

to process an application for registration. The shortest processing time was 1 day and the longest 65 days. Processing time can be reduced if complete information is provided in a timely manner. Variations in the amount of time that the registration process usually takes depends in part on the processing time of the College but is also dependent on delays related to the provision of accurate information and appropriate supporting documentation being provided by the applicant. The process may take longer if an applicant needs to re-take examinations or does not meet a requirement outlined in the Registration Regulation and therefore has to provide additional information or be referred to the Registration Committee.

Once the College receives a complete application (including all relevant documentation/fees) standard processing time is 10-15 business days but may be longer depending on the time of year the application is received (e.g. during the online annual renewal period).

The registration processing general timelines are outlined for applicants as part of the information available on the College website under each step description under the "Become a ND>Register" section and in the flow chart included in the Application Handbook available in under "Resources>Handbooks, Tools and Forms>Registration".

o) information about all fees associated with registration, such as fees for initial application, exams and exam rewrites, course enrolment or issuance of licence

Information with respect to all fees associated with registration (including application fees, assessment fees, exams and exam re-writes) are noted on the website for applicant reference (e.g. the PLAR stages overview flowchart and the Ontario Clinical Examinations web page under the 'Become a ND' tab) and in supplementary reference guides (e.g. The Ontario Clinical Examinations Handbook and the Handbook for Applications for Registration in the 'Resources' tab of the College website).

p) accommodation of applicants with special needs, such as visual impairment

As part of its duty to accommodate and ensure applicants are provided with a fair opportunity to sit entry-to-practise examinations, the College considers all exam accommodation requests received from any examinations candidate (i.e. anyone registered for an exam). Exam accommodations are reviewed and made on an individual basis, to reflect the nature and extent of the identified need. The College's duty to accommodate is limited only by undue hardship, such as cost, availability of outside sources of funding, and health and safety requirements (such as would pose a risk to health and public safety).

Information regarding requesting an accommodation (whether it be a cognitive disability, physical disability, religious requirement, or pregnancy-related need) is made readily available to applicants in the Ontario Clinical Examinations Handbook (posted in the Resources section of the College website and linked to on the Ontario Clinical Examinations page under the 'Become a ND' tab), including deadlines for requesting such accommodations (also detailed in the Examination Schedule posted under the 'Become a ND' tab), required supporting documentation and timelines for receiving decisions on requested accommodations.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

All registration practises were implemented as of July 1, 2015 (proclamation of the Naturopathy Act, 2007).

a) Are any of the fees different for internationally trained applicants? If yes, please explain.

Applicants educated internationally or in Canada, who have not graduated from a naturopathic program accredited by the Council on Naturopathic Medical Education (CNME), will be subjected to *additional* fees as those applicants would complete an alternate registration process. Currently, there are seven accredited schools, five of which are located across the USA and the remaining two are in Canada. The College's Prior Learning Assessment and Recognition (PLAR) program allows non-CNME program graduates to be assessed with the same objective competency criteria of all applicants, regardless of where they received their naturopathic training.

The additional fees for PLAR stem from demonstrations of competency via written and practical assessments conducted by the College:

- Component 1 - \$750 + HST
- Components 2 and 3 - \$1750 + HST

All other fees remain the same for non-CNME or internationally trained applicants.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

None at this time.

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3. Provision of Timely Decisions, Responses and Reasons

a) What are your timelines for making registration decisions?

The College's registration process includes three-steps:

Step 1: Pre-registration (establishing a profile with the College, stream of application and enabling applicants to register for entry-to-practice examinations) 3-5 business days for processing

Step 2: Application for registration (completion of online application form and submission of supporting documentation, verification that all requirements for registration have been met) 7-10 business days for processing

Step 3: Issuance of a certificate of registration (the finalization of the registration process by way of providing proof of professional liability insurance, payment of pro-rated annual registration fee and provision of photo for the public register) 3-5 business days for processing

Within 7-10 business days of receipt of an online application for registration (step 2 of the registration process), payment of the application fee and receipt of all necessary supporting documentation including, an original CPIC report and proof of Health Care Provider Level CPR, the College reviews the application and informs the applicant by email of their eligibility to register. Where an online application is submitted but the supporting documentation has not been received, the College cannot finalize the processing of the application and informs applicant of missing documentation. A checklist is provided to assist applicants in providing all necessary information to enable efficient processing of their application. After reviewing an online application, where corrections are required, the applicant is notified of the necessary corrections and provided access to their online form. The College will then re-review the application within 7-10 business days of re-submission of the application.

b) What are your timelines for responding to applicants in writing?

Applicants (and Members) submitting routine registration inquiries in writing are usually provided with a written response by Registration staff within one to three business days. If a response requires additional information to be obtained, a confirmation of receipt is sent to the inquiring applicant with an approximate timeframe for response.

c) What are your timelines for providing written reasons to applicants about all registration decisions, internal reviews and appeal decisions?

Based on the College's first 6 months of operation, work is underway to establish timelines for the provision of written reasons related to registration decisions. To date, where applicants have been referred to the Registration Committee, every effort is made to accommodate the referral at the next available meeting of the Registration Committee while also ensuring due process such that applicants are provided time to make written submissions in accordance with the Health Professions Procedural Code. Where possible applicants are informed of registration decisions shortly after the meeting. The College aims to have written reasons provided within 30 days of the meeting.

Decision outcomes made by the Examination Appeals Committee will be sent to the candidate by mail within sixty (60) business days of receipt of the examination appeal request.

d) Explain how your organization ensures that it adheres to these timelines.

Operating policies ensure that the College adheres to timelines, and staff goals for providing reasonable processing turnaround times are monitored. College staff and members of the Registration Committee members are also sensitive to applicants' needs for decisions in a timely manner and strive to ensure that matters are handled within a reasonable timeframe.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

All policies and practises related to the provision of timely decisions, responses and reasons were put into effect as of July 1, 2016 (proclamation of the Naturopathy Act, 2007); no additional changes have occurred. Work is underway to further streamline the application and registration process and to enable faster referrals of an application where necessary.

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4. Access to Records

a) Describe how you give applicants access to their own records related to their applications for registration.

Requests for access to records are infrequent as applicants have provided most of the documentation that appears in the file. Applicants are able fill out the second and third (final) steps of the registration through the College's website via login and password and are able to view their contact information, CPR credentials, and Professional Liability Insurance information, all of which would have been provided by the applicant. They also have the ability to make changes to their contact information such as address and telephone numbers.

For documents that are sent directly from a third party (e.g. University transcripts; confirmation of registration with another regulatory body, etc.), an applicant is provided a copy upon request. If an applicant requests the original copy of course descriptions that have been provided by a university, the College provides the original documents to the applicant and retains a copy in our files.

The applicant is also informed of the documentation reviewed by the Registration Committee and if registration is refused, if additional education or training is required or if Terms, Conditions or Limitations are to be applied to the certificate of registration, the applicant will receive a copy of the reasons and decisions issued by the Panel of the Registration Committee (s 20(1) of the Code).

b) Explain why access to applicants' own records would be limited or refused.

Applicants are not refused access to any aspect of their records within the limits of the law, specifically, Section 16(2) of the RHPA states that: "The Registrar may refuse to give an applicant anything that may, in the Registrar's opinion, jeopardize the safety of any person."

c) State how and when you give applicants estimates of the fees for making records available.

The College does not charge a fee for providing copies of records and therefore estimates of the cost are not necessary.

d) List the fees for making records available.

The College does not currently charge a fee for providing copies of records.

e) Describe the circumstances under which payment of the fees for making records available would be waived or would have been waived.

The College does not currently charge a fee for providing copies of records and therefore there is nothing to waive.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

N/A

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5. Resources for Applicants

a) List and describe any resources that are available to applicants, such as application guides, exam blueprints or programs for orientation to the profession.

The College website gives applicants access to a variety of Handbooks, Guides and other useful information for entering the profession.

The College offers a Handbooks-Tools-Forms Page:

- Complaints and Discipline
- Examinations
 - Ontario Clinical Examinations Handbook
 - Quick-Reference to Complete Online Exam Registration
 - Jurisprudence Handbook
 - Ontario Prescribing and Therapeutics Handbook
 - Examination Rules of Conduct
 - Course Instructor Bios

- ON Prescribing Course Outline
- Quality Assurance
- Patient Relations Program
- Registration
 - Application for Pre-Registration
 - Application handbook - Updated 2/5/2016
 - Applicant Checklist (New)
 - Photo Submission Form
- CONO Professional Corporations Guide - 2016 Update
- PLAR Guides:
 - Document of Education and Experience - Applicant Guide
 - Document of Education and Experience Form

The website also provides links to applicants and members

- Code of Ethics
- College By-laws
- College Policies
- College Reports
- Committees
- Handbooks-Tools-Forms
- Legislation-Regulations
- Practice Guidelines
- Standards of Practice

b) Describe how your organization provides information to applicants about these resources.

The College website serves as the primary tool to provide information about the requirements for registration. Applicants are encouraged to consult the website to retrieve the appropriate forms and checklists for the application process. Once the Pre-Registration form is received by the College, the applicant is informed by registration staff to proceed to the website for the next steps and are further encouraged to utilize the Registration and Examinations Handbooks.

Registration staff provide information and guidance to prospective applicants on registration requirements, policies and procedures by direction to specific links on our website. Staff are responsible for updating and maintaining the registration portion of the website and all registration documents (guides, application forms etc.) to ensure that the information is current, complete, clear and easy to find.

An annual presentation is conducted at the Canadian College of Naturopathic Medicine for students in their fourth year of the program. As part of this presentation information is provided to assist new graduates in applying to the College of Naturopaths of Ontario, including what resources are available and how to access them. Students are also able to subscribe to the College's electronic newsletter for additional information on College activities and resources.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

The College website and handbooks are updated to reflect current information.

In this section, describe your internal review or appeal process. Some regulatory bodies use these two terms (*internal review* and *appeal*) for two different processes, some use only one of these terms, and some use them interchangeably. Please use the term that applies to your profession. If you use both terms (for two different processes), please address both.

a) List your timelines for completing internal reviews or appeals of registration decisions.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions. Applicants are advised that registration decisions are appealable to HPARB.

However, as part of the Prior Learning Assessment and Recognition (PLAR) Program Policy the College has established a process for administrative reconsiderations available to those applicants who are completing the various stages of the PLAR process as follows:

Stage 1: Initial Application and Assessment

Where a candidate's identity is confirmed and their education is deemed not to be equivalent to a bachelor's degree, in which case the candidate's education and experience is deemed not substantially equivalent and he/she is referred to a full-time CNME-accredited education program, the candidate may request an administrative reconsideration, in which case, they would provide their educational information to an alternate third-party agency. The College would review this information based on the identified outcomes.

Stage 2 : Paper-based Assessment

An administrative reconsideration may be requested where candidates who are informed that their education and experience is not substantially equivalent. In this case, their file would be reassessed independently by a different assessor; an additional fee would be required to initiate this process. Reconsiderations must be requested within 60 days of receiving the results of the assessment from the College.

In addition, PLAR candidates are allowed second attempts at failed written examinations within the process and where a non-passing grade of between 50% and 74% for the demonstration-based assessment (stage 4) is obtained, they will be allowed one re-attempt of stage 4.

To date no PLAR applications have been received and no administrative reconsiderations have been required.

i. State the number of internal reviews or appeals of registration decisions that exceeded your timelines.

Not applicable. The College does not presently conduct internal reviews or appeals of registration decisions. See question a) above.

ii. Among internal reviews or appeals that exceeded your timelines, state the number that were from internationally trained applicants.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions. See question a) above.

b) Specify the opportunities you provide for applicants to make submissions regarding internal reviews or appeals.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions.

As noted in question a), where administrative reconsiderations are implemented, PLAR candidates in stage 1 may submit their educational information to an alternate third party assessment agency and the College will review the information identified. Where a candidate is requesting an administrative reconsideration for stage 2, the candidate's file will be reviewed by different assessors possibly with the ability for the candidate to provide additional

supporting documentation.

c) Explain how you inform applicants about the form in which they must make their submissions (i.e., orally, in writing or by electronic means) for internal reviews or appeals.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions.

Where the College were to receive a request for an administrative review as part of a PLAR application, the College would communicate with the applicant in writing, generally electronically, to provide the necessary information with regards to enabling the reconsideration.

d) State how you ensure that no one who acted as a decision-maker in a registration decision acts as a decision-maker in an internal review or appeal of the same registration decision.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions.

Where an administrative reconsideration is requested by a PLAR applicant, the College would appoint different assessors from those who originally completed the paper-based assessment, none of these assessors would then sit on a Registratiton Committee panel where a registration decision is to be made with regards to the same applicant.

e) Describe your internal review or appeal process.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions. Applicants are advised that registration decisions are appealable to HPARB.

However as noted in question a), as part of the Prior Learning Assessment and Recognition (PLAR) Program Policy the College has established a process for administrative reconsiderations available to those applicants who are completing the various stages of the PLAR process as follows:

Stage 1: Initial Application and Assessment

Where a candidate's identity is confirmed and their education is deemed not to be equivalent to a bachelor's degree, in which case the candidate's education and experience is deemed not substantially equivalent and he/she is referred to a full-time CNME-accredited education program, the candidate may request an administrative reconsideration, in which case, they would provide their educational information to an alternate third-party agency. The College would review this information based on the identified outcomes.

Stage 2 : Paper-based Assessment

An administrative reconsideration may be requested where candidates who are informed that their education and experience is not substantially equivalent. In this case, their file would be reassessed independently by a different assessor; an additional fee would be required to initiate this process. Reconsiderations must be requested within 60 days of receiving the results of the assessment from the College.

In addition, PLAR candidates are allowed second attempts at failed written examinations within the process and where a non-passing grade of between 50% and 74% for the demonstration-based assessment (stage 4) is obtained, they will be allowed one re-attempt of stage 4.

To date no PLAR applications have been received and no administrative reconsiderations have been required.

f) State the composition of the committee that makes decisions about registration, which may be called a Registration Committee or Appeals Committee: how many members does the committee have; how many committee members are members of the profession in Ontario; and how many committee members are internationally trained members of the profession in Ontario.

Not applicable. The College does not conduct internal reviews or appeals of registration decisions.

The current composition of the Registration Committee is as follows:

Total number of members: 6

Number of professional members (Ontario): 4

Number of public members: 2

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

Not applicable at this time.

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7. Information on Appeal Rights

a) This section refers to reviews or appeals that are available after an internal review or appeal. Describe how you inform applicants of any rights they have to request a further review of or appeal from a decision.

Information with respect to an applicant's ability to appeal a registration decision (e.g. refusal to issue a certificate of registration) is communicated to the applicant via a written letter informing the applicant of the registration decision and their right to appeal the decision to the Health Professions Review and Appeal Board (HPRB) in accordance with the Health Professions Procedural Code. Additional information will be added in supporting materials (e.g. Handbook for Applications for Registration) to ensure all applicants are aware of their right to appeal a registration decision via HPRB.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

All appeal processes were put in place as of July 1, 2015 (proclamation of the Naturopathy Act, 2007); no additional changes with respect to appeals have been implemented.

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8. Assessment of Qualifications

This category covers your processes for assessing all qualifications, such as academic credentials, competencies, language ability or practical experience.

a) List the criteria that must be met in order for an applicant's qualifications to satisfy the entry-to-practice requirements for your profession.

In order to practice Naturopathy in Ontario, all applicants must have completed a Council on Naturopathic Medical Education-accredited program in Naturopathy or a program that is substantially equivalent. The regulation specifies the three pathways of entry to the College:

- Applicants who have graduated from a school accredited by the Council on Naturopathic Medical Education (CNME), and have written the Naturopathic Physicians Licensing Examinations (NPLEX) administered by the North American Board of Naturopathic Examiners (NABNE);
- Applicants who have graduated from a non-accredited program and have been assessed by the College via the Prior Learning Assessment and Recognition (PLAR) program to have training and knowledge which is substantially equivalent to a CNME accredited education and entry-to-practice examinations; or
- Applicants who are Naturopathic Doctors wishing to transfer to Ontario from another regulated Canadian jurisdiction where they are registered, in good standing and actively practising the profession.

Having met one of the three requirements, applicants must then successfully complete the Ontario Clinical Examinations and the jurisprudence examination in order to be eligible for registration.

Jurisprudence (non-exemptible)

All applicants are required to demonstrate familiarity with the laws, regulations and standards that relate to the practice of naturopathy in Ontario by successfully completing the online Jurisprudence Exam Module. The module may be completed up to two years prior to submission of an application for registration.

Entry-to-Practice Examinations (non-exemptible)

All applicants must successfully complete entry-to-practice examinations in Clinical Sciences, Clinical Elective in Acupuncture and the College administered Clinical Examinations in Acupuncture, Naturopathic Manipulation and Physical Examination/Instrumentation.

Language Proficiency (exemptible)

All applicants must possess sufficient language proficiency, in either English or French, to be able to communicate and comprehend effectively, both orally and in writing as outlined in the Registration Regulation. If the applicant's first language is neither English nor French and their naturopathic education (or related) was not in English or French, the applicant must submit documentation demonstrating fluency in either official language in accordance with the College's Language Proficiency Policy.

Good Character (exemptible)

All applicants are required to provide the original of a recent name-based Canadian Police Information Centre Criminal Records Synopsis or CPIC Check. The police check is valid for six months from the date of issue. In addition, all applicants must answer mandatory questions and, where they answer yes to any of the questions must provide further information to the College. The mandatory declaration questions require applicants to respond to the following issues:

- Conviction for a criminal offence or any offence resulting in a fine greater than \$1,000 or any type of incarceration
- Finding of professional misconduct, incompetence or incapacity in any jurisdiction
- Any current proceeding for professional misconduct, incompetence or incapacity in any jurisdiction
- Any finding of professional negligence or malpractice in any jurisdiction
- Any license/registration refusal by another regulator in any jurisdiction
- Any attempt at an examination for registration with a health profession not resulting in a passing grade
- Any other event that would provide reasonable grounds that the applicant's past and present conduct will not allow them to practise in a safe and professional manner

Professional Liability (exemptible)

All registrants must provide evidence that they have the amount and form of professional liability insurance as required by the College's by-laws.

Proof of Identity (exemptible)

To establish identity, the College requires an Applicant, Candidate and Member to provide their legal name, signature, current photograph and date of birth as well as disclosure of any other or former names by which the individual may have been known, any nicknames or abbreviations by which the individual may be known. The document submitted must be current and valid, that is, they must be official documents that include a photograph and signature and they must not have expired. Notwithstanding the documents that may provide proof of identity, the College of Naturopaths of Ontario does not require that an Applicant or a Member be resident in Ontario or a Canadian citizen. The College has outlined its proof of identity requirements in its Proof of Identity Registration Program Policy available on the College's website under "Resources>College Policies>Program Policies".

Should any of the items be missing or incomplete, Applicants will need to provide additional official documents to complete the identification requirements per the College's satisfaction. Where an Applicant cannot provide proof of identity, the College may accept a sworn affidavit certified by a Notary Public, subject to acceptance by a panel of the Registration Committee.

b) Describe the methodology used to determine whether a program completed outside of Canada satisfies the requirements for registration.

Applicants applying through PLAR are required to have their academic credentials evaluated by one of the College-approved credential assessment agencies who will assess the applicant's credential to determine level of equivalency to Canadian degree programs. Only those degrees that are assessed to be equivalent to a university level (bachelor's degree or higher) in any discipline will be considered by the College.

c) Explain how work experience in the profession is assessed.

In determining an applicant's having 'practised the profession' the following definitions would be considered by the College as relevant work experience.

- Direct patient care: May include consultations, patient visits, assessments and treatment
- Research: Research relating to patient care, i.e. a specific case.
- Clinical supervision: Clinical supervision involving supervising a student or ND involved in direct patient care.
- Clinical education: Clinical education involving patient interaction or provision of professional services while teaching.
- Colleague communication vis-à-vis case management: Communicating with colleagues regarding case management.
- Mentoring: Mentoring a colleague in the provision of services to patients.

Proof of the above may be provided in the form of letters of employment, attestations from clinic supervisors or colleagues (e.g. written letter), copies of one's appointment calendar/book, research articles or summaries, etc.

d) Describe how your organization ensures that information used in the assessment about educational systems and credentials of applicants from outside Canada is current and accurate.

The College does not assess the transcripts of internationally educated applicants to determine if they are equivalent to a Canadian degree program. The applicant, whose education is from outside of Canada, must submit the results of such an assessment completed by a College-approved credential agency.

The College assesses applicants whose education has been determined to be equivalent to a four-year university degree using a competency-based assessment approach. As part of the Document of Education and Experience (DEE), trained assessors review course descriptions and syllabi provided by the candidates as part of its review.

e) Describe how previous assessment decisions are used to assist in maintaining consistency when

assessing credentials of applicants from the same jurisdictions or institutions.

As a new College, we are still compiling a reference bank of decisions and reasons for reference, both by staff and by members of the Registration Committee when assessing applications, to ensure consistency is maintained. However, each case will always be considered individually based on its own merits and circumstances.

f) Explain how the status of an institution in its home country affects recognition of the credentials of applicants by your organization.

The College of Naturopaths of Ontario considers the content of completed courses from university level institutions. We rely on the expertise of recognized credentialing agencies to assess whether an applicant's education is at a level equivalent to a university level baccalaureate in Canada.

g) Describe how your organization accommodates applicants with special needs, such as visual impairment.

The College is committed to providing accommodations for applicants and members when requested, up to the point of undue hardship, whether it be related to a cognitive or physical disability, religious requirement, or a pregnancy or nursing-related need.

Such accommodations are generally made around the College-administered examinations (both entry-to-practise and post-registration). The process for requesting an exam accommodation is described in the Ontario Clinical Examinations Handbook available in the Resources section on our website, and deadline dates for requesting an accommodation are noted in the tables for each exam under "Become a ND>Examinations>Examination Schedule" on the College website. Requests for accommodations are reviewed on a case-by-case basis and decisions provided to the candidate within 10 business days unless additional information is needed before a decision can be rendered.. Some examples of possible accommodations include:

- Additional time to complete the examination
- Reading/Dictation software
- Being permitted to type one's answers
- Private room/separate invigilator
- Food/drink in the exam room
- Reader/Scribe
- Large print documents
- Allowance to take time during a scheduled break to go and nurse

h) State the average length of time required to complete the entire registration process, from when the process is initiated to when a registration decision is issued.

Approximate length of time for registration from step 2 (application for registration); i.e. once an applicant has completed his/her entry-to-practise requirements with successful completion of all entry-to-practise examinations and has submitted his/her application for registration with all supporting documentation, to the point of being issued a certificate of registration is approximately 15 business days provided there are no issues with respect to good character which warrant additional review and possible referral to the Registration Committee for deliberation, or missing/inocorrect information on the application for registration which the applicant must rectify.

i. State whether the average time differs for internationally trained individuals.

The average length of time for registration for internationally trained individuals would not differ from point of submission of their application for registration to issuance of the certificate of registraion (see answer for 8 h). PLAR process timeline to determine substantial equivalency of the applicant's prior learning and experience are still being determined, as portions of the process may be completed concurrently. The College is presently reviewing

timelines for each stage of PLAR (outlined on the College's website under "Become a ND>PLAR>PLAR Stages).

ii. If the average time differs for internationally trained individuals, state whether it is greater or less than the average for all applicants, and the reasons for the difference.

While it is anticipated that the average length of time from Step 2 (application for registration) to issuance of a certificate not be greater or less for non-CNME accredited program applicants, additional information is needed with respect to the time differences between Step 1 (Application for Pre-Registration) and issuance of a certificate of Registration between CNME-accredited program graduates and PLAR applicants following the College's receipt of an initial PLAR application.

i) If your organization conducts credential assessments, explain how you determine the level (e.g., baccalaureate, master's, Ph.D.) of the credential presented for assessment.

Not applicable. Credential assessments are conducted via recognized third-party credentialing agencies.

i. Describe the criteria that are applied to determine equivalency.

The PLAR program is designed to best approximate the evolution, learning, development and assessment mechanisms used in CNME-accredited programs. To this end, the general philosophy applied in assessing substantial equivalency is that an individual first must demonstrate fundamental academic understanding of the profession and then be able to apply that understanding in practice. To this end, the PLAR is divided into three major components: Component I: Assessment of Knowledge in Naturopathic Medicine (Stages 1, 2 and 3), Component II: Assessment of Professional Competency (Stage 4) and Component III – a final written examination (Stage 5).

Information with respect to each stage of the PLAR process, including criteria and set thresholds for substantiating equivalency at each stage of the PLAR process is detailed in the College's PLAR Program Policy available via the College's website under Resources>College Policies>Program Policies>PLAR.

ii. Explain how work experience is taken into account.

PLAR

As part of the paper-based assessment stage of the PLAR process, applicants are encouraged to provide evidence of knowledge related to 4 fundamental categories related to naturopathy, which can be substantiated with a combination of formal education and work experience. Should the candidate be deemed not substantially equivalent during this stage, they have the opportunity to provide additional supporting material which may also include work placement information.

Inter-Provincial Transfers

Applicants applying for Registration under inter-provincial transfer provisions of the Agreement on Internal Trade (AIT) are asked to provide a Letter of Good Standing from their current regulatory body to substantiate their having been practising the profession. Notwithstanding real or perceived differences in the scope of practice of the profession between regulated Canadian provinces, the College recognizes the entry-to-practice requirements are substantially equivalent across Canada. As a result, no additional educational requirements nor terms, conditions or limitations will be placed on the certificate of registration of an applicant from another regulated Canadian jurisdiction except where such is warranted on the basis of disclosures made during the application process.

Entry-to-Practise

Under the College's Registration Regulation, applicants who exceed the 24 month period between completion of their entry-to-practise examinations and submission of their application for registration, must submit proof of having practised the profession for at least 750 hours during the three-year period of time that immediately preceded the date that the applicant submitted his or her application, or must complete further training/education as approved by a panel of the Registration Committee.

j) If your organization conducts competency assessment, describe the methodology used to evaluate competency.

The evaluation schema used to assess PLAR applicants is based on the core competencies of the profession and the CNME accreditation standards. The various stages of the PLAR process provide opportunities to assess an applicant's knowledge related to the practise of the profession and thier ability to demonstrate competency in each of the core areas for safe and ethical practise.

Where an applicant has submitted an application not in keeping with the timelines established in the Registration Regulation, and where the applicant has not been practising the profession for 750 hours in the previous three-year period, the applicant is asked to undertake a self-assessment based on the Standards of Practice and core competencies of the profession and to develop a learning plan to address any gaps, which is then evaluated by the Registration Committee to determine if the plan is acceptable such that upon completion the applicant would possess the necessary knowledge, skill and judgment to practise the profession safely, competently and ethically.

i. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

Methodology for evaluating competency is based on the College's Standards of Practice for the profession and core competencies, and integrated components of the College's Quality Assurance peer and practice assessment and self-assessment tools. Annual review of these tools is conducted by College staff and the Registration Committee (in conjunction with possible changes to the portions related to the Quality Assurance Committee) to ensure they accurately assess current competencies in relation to the practise of the profession.

ii. Explain how work experience is used in the assessment of competency.

Work experience is reviewed in relation to the Registration Committee's assessment of currency to ensure atrophy of skill has not ocured in the time between the applicant's graduation from a CNME-accredited program or College's determination of substantial equivalency and when they submit an application to practise the profession.

k) If your organization conducts prior learning assessment, describe the methodology used to evaluate prior learning.

The College's prior learning assessment is broken down into 5 decision stages throughout 3 larger components as follows:

Component I: Assessment of Knowledge in Naturopathic Medicine

- Assessment standards are informed by the College's Core Competencies and CNME Accreditation Standards
- **Part I:** "Paper-Based Assessment" based on assessment schema and passing thresholds.
- **Part II:** Includes Written Examination #1 (version of an exam completed by CNME-accredited grads)

Component II: Assessment of Professional Competency

- Assessment standards are informed by the College's Core Competencies and CNME Accreditation Standards
- Includes: OSCEs, structured interview and case study with collective passing threshold.

Component III: Written Examination #2

- Consists of Written Examination #2 (version of an exam completed by CNME-accredited program grads)

Additional information is available via the PLAR program policy on the College's website under "Resources<College Policies<Program Policies<PLAR"

i. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

In an effort to develop a system which is both thorough and reflective of contemporary day-to-day practice in Ontario, prior learning experts (based on a RFP process to identify relevant consultants) and three subject matter experts were retained. These subject matter experts are current practitioners in the field and possess the skills and abilities that contribute to success and safety in the workplace. The specific focus of their work was twofold: i) providing advice and guidance as to the entire evaluation/Prior Learning Assessment and Recognition (PLAR) process including the creation of an assessment rubric, and ii) the development of new assessment tools (i.e. structured interviews, case studies) based on both the CNME accreditation standards and the core competencies set by the transitional Council.

Significant research was carried out in support of the assessment tools, policies and mechanisms set out in the PLAR program. Such research included a literature review and environmental scan of other health care professions in Canada which revealed a number of best practices that have been used to inform the development of this PLAR system.

Newly developed tools were pilot tested with a number of internationally educated individuals and adjusted based on feedback from assessors.

The assessment tools were further refined by the College's Registration Committee. Through a facilitated process under the guidance of the retained prior learning experts, the order, flow, content and passing thresholds for all aspects of the assessment process were discussed and finalized. Further refinement of the process will occur as applications are received and processed, and/or as changes occur within the profession in Ontario

ii. Explain how work experience is used in the assessment of prior learning.

In an effort to ensure that the applicant possesses critical knowledge related to the practise of naturopathy, evidence related to both formal education and experience is considered when assessing the specific content areas which applicants must satisfy during the paper-based assessment stage (Stage 2) to move forward in the PLAR process. Should an assessor determine that the applicant's Documentation of Education and Experience (DEE) contains insufficient information to determine substantial equivalency in this stage, the applicant is provided with an opportunity to provide supplementary evidence.

1) If your organization administers examinations, describe the exam format, scoring method and number of rewrites permitted.

The College administers:

a) The Ontario Clinical Examinations - three (3) examinations testing entry-to-practise competencies in acupuncture, naturopathic manipulation and physical examination/instrumentation. Each examination is comprised of a practical component to test a candidate's hands-on ability to practise competently and safely, and a written addendum testing knowledge of indications for use, contraindications to treatment, safety and emergency protocol and normal and abnormal clinical presentations. Scoring for both components is presently done manually, with the practical component based on a set rubric and the written component based on established industry standards and resources. Candidates are permitted 3 attempts to successfully complete the Ontario Clinical Examinations.

b) The Ontario Jurisprudence Examination - administered as an online, low stakes, open-book exam. Candidates are permitted to reference any resource they wish during the exam, are not timed in their completion of the examination, and are provided with a detailed handbook which provides example questions and scenarios for each section, along with the rationale for answers related to each. Candidates may attempt the Jurisprudence exam as many times as needed.

i. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

Each exam has a set format based on established blueprints identifying the competency to be tested and the means for determining if the candidate has demonstrated sufficient knowledge or skill and the necessary passing

thresholds. Prior to each exam session, grading forms and rubrics are reviewed for each exam by at least 4 members of the profession and following each exam session, a post-test analysis is conducted based on pass/fail rates, common errors and/or issues which may indicate needed content revisions and/or mark adjustments prior to results being issued.

ii. State how often exam questions are updated and the process for doing so.

College administered examinations were implemented as of August 2015. An additional review and revision of grading forms, grading rubrics and written exam questions was conducted in December 2015. It is anticipated that a College appointed Exam Review Committee will perform bi-annual reviews of exam content and revisions to format and content.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

Policies and procedures relevant to the College's assessment of qualifications were put into place as of July 1, 2015 (proclamation of the Naturopathy Act, 2007); no additional changes have been implemented.

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9. Third-Party Organizations

a) List any third-party organizations (such as language testers, credential assessors or examiners) relied upon by your organization to make assessment decisions.

Entry-to-Practise Examinations

The North American Board of Naturopathic Examinations (NABNE) who administer another set of written examinations presently required by all North American naturopathic regulatory bodies as a pre-requisite to determining eligibility for registration

PLAR Assessments

Accredited credential evaluation agencies who assess an applicant's formal education/academic degree(s):

- Comparative Education Service;
- International Credential Assessment Service of Canada;
- International Credential Evaluation Service;
- International Qualifications Assessment Service;
- Ministère de l'Immigration et des Communautés culturelles;
- World Education Services.

Language proficiency testing bodies who assess an applicant's ability to communicate in either English or French if the applicant's primary language is not English or French, and where any portion of their relevant formal education was not conducted in English or French:

- Test of English as a Foreign Language (TOEFL)
- The International English Language Testing System (IELTS)
- CanTEST
- TESTcan

PLAR Demonstration-based Assessments of Competency

As a component of Step 4, the demonstration based-assessment, an Objective Structured Clinical Examination (OSCE) will be implemented in partnership with the Ontario training College, the Canadian College of Naturopathic Medicine (CCNM), to ensure a robust/fair examination to allow applicants to demonstrate to assessors certain skills and competencies they have acquired that cannot be adequately assessed by the paper-based process alone. This examination will be administered by the CCNM and scored based on a mutually agreed upon rubric and criteria.

b) Explain what measures your organization takes to ensure that any third-party organization that it relies upon to make an assessment:

i. provides information about assessment practices to applicants

PLAR

i) The College website contains links to the third party credentialing agencies it relies upon. These websites have been reviewed to ensure that applicants can find information about services and fees, required documentation, and the application process. All listed credential agencies follow the quality assurance guidelines of the Alliance of Credential Evaluation Services of Canada and are typically used by other Ontario Regulatory Colleges.

ii) Each of the language tests approved by the College is administered by an organization with a demonstrated history of valid and reliable language proficiency tests utilized by other Ontario Regulatory Colleges . Their tests include fairness principles such as standardized formats, reliance on experts for exam content, access to score results and profiles, and test guides and practice tests. Links to all approved language tests are available via the College website under "Become a ND>PLAR>PLAR overview"

Entry-to-Practise Examinations

Regular information updates are provided to applicants by the North American Board of Naturopathic Examinations (NABNE) related to the Naturopathic Physicians Licensing Examinations (NPLEX) via their website www.nabne.org

ii. utilizes current and accurate information about qualifications from outside Canada

PLAR

The College is assured that all the third-party organizations from which it will accept results (none received to date) utilize current and accurate information about qualifications outside Canada. This assurance is gained through review of all third-party website content, contacts established with the third-party agencies and through discussions with other regulatory Colleges who use these agencies to assess applicants, in addition to the recommendations from prior learning experts/consultants.

iii. provides timely decisions, responses and reasons to applicants

PLAR

The College is assured that recognized third-party organizations provide timely decisions, responses and reasons to all applicants. This assurance is gained through review of all third-party website content, contacts established with third-party agencies and through discussions with other regulatory Colleges who use these agencies to assess applicants.

Entry-to-Practise Examinations

Timelines stipulated with respect to the NPLEX examinations are regularly updated via NABNE's website, through their examination schedule, examination bulletins, and "important dates" section of their website (www.nabne.org). Applicant transcript mailing dates, and all are regularly reviewed by College staff to ensure scheduling of the provincial entry-to-practise examinations administered by the College do not hinder an applicant's ability to register within a reasonable timeframe.

iv. provides training to individuals assessing qualifications

PLAR

The College is assured that recognized third-party organizations provide training to individuals assessing qualifications. This assurance is gained through review of all third-party website content, contacts established with third-party agencies and through discussions with other regulatory Colleges who use these agencies to assess applicants.

v. provides access to records related to the assessment to applicants

PLAR

The College is assured that recognized third-party organizations provide access to records related to the assessment of applicants. This assurance is gained through review of all third-party website content, contacts established with third-party agencies and through discussions with other regulatory Colleges who use these agencies to assess applicants.

Entry-to-Practise Examinations

Transcript information for the NPLEX examinations via NABNE, is made available to candidates via their website www.nabne.org>Post-Examination Administration, and includes information for applicants with respect to cut scoring and how to obtain a manual scoring of their examination.

vi. accommodates applicants with special needs, such as visual impairment

PLAR

The College is assured that recognized third-party organizations provide accommodations with special needs. This assurance is gained through review of all third-party website content, contacts established with third-party agencies and through discussions with other regulatory Colleges who use these agencies to assess applicants.

Entry-to-Practise Examinations

Information with respect to the NPLEX testing accommodations, including the submission and review process for an accommodation request, is made readily available to candidates via NABNE's website: www.nabne.org>Exam Administration>Testing Accommodations.

c) If your organization relies on a third party to conduct credential assessments:

i. Explain how the third party determines the level (e.g., baccalaureate, masterís, Ph.D.) of the credential presented for assessment.

The College uses credentialing agencies to determine the level of the credential presented for assessment based on the college or university transcripts provided. Applicants applying under the College's PLAR program are required to provide proof of having obtained an education in any discipline equivalent to a bachelor's degree (or higher).

ii. Describe the criteria that are applied to determine equivalency.

To ensure that information used in the assessment about educational systems and credentials of PLAR applicants is current and accurate, the College relies on the expertise of the credentialing agencies. All College-approved credential agencies are members of the Alliance of Credential Evaluation Services of Canada, which ensures that individuals have access to fair and credible credential assessment services. Members of the Alliance follow principles of good practice that are consistent with international standards.

All credential agencies' evaluation methodology is based on the level, scope and intent of the program completed. They consider the admission requirement to the program, the length of the program, the depth and breadth of the

curriculum covered, and the options for further study of the degree holder, when formulating equivalencies. In addition, they examine the official status of the degree-granting institution and the program in the home country's education system, as well as any official ratings, when establishing equivalency. These criteria combine and measure credential and educational systemic features to identify if similarities are adequately substantial to grant a Canadian equivalency.

iii. Explain how work experience is taken into account.

Work experience is not factored into the third-party assessment of an applicant's educational credentials.

d) If your organization relies on a third party to conduct competency assessments:

i. Describe the methodology used to evaluate competency.

Not applicable. The College does not rely on a third party to conduct competency assessments.

ii. Explain how the methodology used to evaluate competency is validated, and how often it is validated.

Not applicable. The College does not rely on a third party to conduct competency assessments.

iii. Explain how work experience is used in the assessment of competency.

Not applicable. The College does not rely on a third party to conduct competency assessments.

e) If your organization relies on a third party to conduct prior learning assessments:

i. Describe the methodology used to evaluate prior learning.

The College does not rely on a third party to conduct prior learning assessments.

ii. Explain how the methodology used to evaluate prior learning is validated, and how often it is validated.

The College does not rely on a third party to conduct prior learning assessments.

iii. Explain how work experience is used in the assessment of prior learning.

The College does not rely on a third party to conduct prior learning assessments.

f) If your organization relies on a third party to administer examinations:

i. Describe the exam format, scoring method and number of rewrites permitted.

Entry-to-Practise Examinations

NABNE's NPLEX II and the NPLEX Clinical Elective in Acupuncture examinations constitute one half of the Ontario entry-to-practise examinations, the other provincial portion (Clinical examinations and Jurisprudence) being administered by the College.

NPLEX II is comprised of a series of clinical summaries (i.e. 400 items, organized within approximately 80 case clusters) followed by several questions pertaining to each case, administered over the course of 3 days (approximately 3.5 hours each day). The Clinical Elective in Acupuncture is comprised of 10-15 case clusters (75 items) that include a brief clinical presentation followed by 3-5 items pertaining to that case. Examinees are allowed 90 minutes (1½ hours) to complete the examination.

Detailed information with regards to NABNE's scoring and post-exam analysis is available via www.nabne.org>Post Exam Administration

As the NPLEX examinations are used as part of entry-to-practise requirements for multiple North American jurisdictions, permitted rewrites are at the discretion of the the regulatory authority the applicant intends to register with (i.e. no rewrite cap is place however, only 2 rewrites are permitted under the College of Naturopaths of Ontario's Registration Regulation).

ii. Describe how the exam is tested for validity and reliability. If results are below desired levels, describe how you correct the deficiencies.

Entry-to-Practise Examinations

Since 1990, NPLEX has focused on developing procedures to ensure that national testing standards are followed. NPLEX follows AERA/APA/NCME standards for test development and administration. Extensive analyses of exam performance and passing scores have led to refinement of systems. NPLEX has completed two criterion-related validity studies of the Part II – Clinical Science and Clinical Elective Examinations and has redone the original job analysis three times.

iii. State how often exam questions are updated and the process for doing so.

Entry-to-Practise Examinations

NABNE ensures every exam item is reviewed by a minimum of nine naturopathic doctors to ensure that each item is appropriate and valid. All items are referenced from standard sources.

After each exam administration, a careful analysis is completed to ensure the validity of every item. If there is a problem with an item, the item will be reviewed before scores are finalized. In the past, NABNE allowed examinees to comment on individual items during the testing period, but research performed over the course of several exam administrations showed that items that were potentially problematic had been identified by statistical item analysis. Therefore, the comments offered no new information. Exam results reflect any changes (e.g., giving credit for more than one correct answer) that are made in the post-test analysis process.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

Policies and procedures relevant to third-party organization assessments were implemented as of July 1, 2015 (proclamation of the Naturopathy Act, 2007); no additional changes have occurred.

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a) Describe the training that your organization provides to:

i. individuals who assess qualifications

Assessors retained to implement the College's paper-based review of a PLAR applicant's Document of Education and Experience are trained to ensure understanding of the evaluation schema and criteria to objectively evaluate the materials provided. In addition, training is conducted to orient these individuals to the principles of fair and equitable registration practices, College policies and procedures and the College's public protection mandate. Assessors are recruited based on established criteria and conflicts are vetted. Assessors are trained to perform assessments without any form of racial, religious, political, or sexual discrimination.

ii. individuals who make registration decisions

Each new Registration Committee member undergoes an orientation with legal counsel to ensure they are aware of their statutory duties, the core principles of fair registration practices, and their powers under the Health Professions Procedural Code. Staff provide detailed briefings to aid the Committee in understanding matters which are being brought forward for review, applicable policy information, and previous decisions and reasons are available for reference. The Registration Committee also receives legal advice on a case-by-case basis. The OFC is invited to make presentations for the Registration Committee to further assist members in understanding fair registration requirements.

iii. individuals who make internal review or appeal decisions

The College does not conduct internal reviews or appeals but within the PLAR program an applicant may request an administrative reconsideration and the assessors selected for this process would be trained in the same format noted above in question a) i.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

Policies in relation to training were put into place effective July 1, 2015 (proclamation of the Naturopathy Act, 2007); no additional changes have occurred.

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11. Agreements on the Recognition of Qualifications

Examples of agreements on the recognition of professional qualifications include mutual recognition, reciprocity and labour mobility agreements. Such agreements may be national or international, between regulatory bodies, associations or jurisdictions.

a) List any agreements on the recognition of qualifications that were in place during the reporting period.

The College recognizes NDs registered in other regulated Canadian jurisdictions who are registered in the 'Active' or 'General' class.

Under the Agreement on Internal Trade (AIT) and the Registration Regulation, individuals who have been issued a certificate of registration in the General class in another Canadian province who wish to become registered with the College to practise naturopathy in Ontario, may be issued a certificate of registration in the General class subject to certain qualifications.

Information regarding registration for out-of-province transfers is outlined in the Registration Program policy on the College website under "Resources>College Policies>Program Policies."

b) Explain the impact of these agreements on the registration process or on applicants for registration.

Notwithstanding real or perceived differences in the scope of practice of the profession between regulated Canadian provinces, the College recognizes the entry-to-practice requirements are substantially equivalent across Canada. As a result, no additional educational requirements nor terms, conditions or limitations are placed on the certificate of registration of an applicant from another regulated Canadian jurisdiction except where such is warranted on the basis of disclosures made during the application process, or to address the jurisdictional legislation. AIT applicants transferring to Ontario are only required to complete the College's online jurisprudence exam. Recognition of substantial equivalency under the Agreement on Internal Trade (AIT) facilitates easier mobility for registered naturopaths wanting to practise in Ontario, and reduces the need to assess individuals who have been competently practising the profession in another regulated jurisdiction under entry-to-practise requirements.

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

All labour mobility related policies and practices were implemented as of July 1, 2015 (proclamation of the Naturopathy Act, 2007); no additional changes have been implemented during this reporting year.

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12. Quantitative Information

a) Languages

Indicate the languages in which application information materials were available in the reporting year.

Language	Yes/No
English	Yes
French	No

Other (please specify)

Additional comments:

To date, French materials have not requested.

b) Paid staff

In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, one full-time employee and one part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
Total staff employed by the regulatory body	10
Staff involved in appeals process	0

Additional comments:

Two staff are dedicated to registration, of those one staff member is responsible solely for registration and the other is responsible for overseeing both registration and examinations. One staff member is responsible for examinations and processing of pre-registration applications.

c) Countries where applicants were initially trained

In the following table, enter the top source countries where your applicants¹ were originally trained in the profession (**excluding** Canada), along with the number of applicants from each of these source countries.

Enter the country names in descending order. (That is, enter the source country for the greatest number of your applicants in the top row, the source country for the second greatest number in the second row, etc.)

Use the dropdown menu provided in each row to select the country.

Note that only one country can be reported in each row. If two or more countries are tied, enter the information for these tied countries in separate rows.

Country of training (Canada excluded)	Number of applicants in the reporting year
n/a	0

¹Persons who have applied to start the process for entry to the profession.
 Select "n/a" from the drop-down list if you do not track this information. Enter "0" in a "Number of applicants" field if you track the information, but the correct value is zero. **Additional comments:**

d) Jurisdiction where members were initially trained

Indicate where your members² were initially trained in the profession (use only whole numbers; do not enter commas or decimals).

The numbers to be reported in the **Members** row are the numbers on December 31st of the reporting year. For example, if you are reporting registration practices for the calendar year 2009, you should report the numbers of members in the different categories on December 31st of 2009.

	Jurisdiction where members were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Members on December 31st of the reporting year	1389	15	21	0	0	1425

² Persons who are currently able to use the protected title or professional designation of the profession.

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

e) Applications processed

State the number of applications your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	75	0	0	0	0	75
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	0	0	0	0	0	0
Inactive applicants (applicants who had no contact with your organization in the reporting year)	1	0	0	0	0	1
Applicants who met all requirements and were authorized to become members but did not become members	0	0	0	0	0	0
Applicants who became FULLY registered members	74	0	0	0	0	74
Applicants who were authorized to receive an	0	0	0	0	0	0

alternative class of licence ³ but were not issued a licence						
Applicants who were issued an alternative class of licence ³	0	0	0	0	0	0

³ An alternative class of licence enables its holder to practise with limitations, but additional registration requirements must be met in order for the member to be fully licenced. Please list and describe below the alternative classes of licence that your organization grants, such as student, intern, associate, provisional or temporary.

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

f) Classes of certificate/license

Indicate and provide a description of the classes of certificate/license offered by your organization. You must specify and describe at least one class of certificate/license (on line a) in order for this step to be complete.

#	Certification	Description
a)	General Certificate of Registration	<p style="text-align: center;">Description (a)</p> <p>A certificate which grants the member the right to actively practise naturopathy in the capacity of a clinical practitioner, including but not limited to providing direct patient care within the scope of practice of the profession and the ability to perform controlled acts as set out in section 4 of the Naturopathy Act in accordance with the CONO Regulations, Standards of Practice, policies and guidelines.</p> <p>A member who holds a General certificate of registration may use one or more of the titles "Naturopath", "Naturopathic Doctor", "Naturopathe" and "Docteur en naturopathie", and may use the abbreviation "ND" for an English title and "DN" for a French title.</p>
b)	Inactive Certificate of Registration	<p style="text-align: center;">Description (b)</p> <p>A member who is not authorized to practise naturopathy and may not perform any controlled acts as set out in section 4 of the Naturopathy Act, 2007. May only use the titles Naturopath (Inactive) or ND (Inactive) or the French equivalents. Members in this class of registration may apply for a General certificate of registration and may move back to active practise having met the requirements outlined in</p>

		section 10 of the Registration Regulation.
c)	Life Member	Description (c)
		A member who has retired from the practise of naturopathy and has been designated by the Registration Committee to have met the requirements for Life Membership as outlined in section 23 of the College by-laws.

Additional comments:

Beyond the terms, conditions and limitations (TCLs) outlined in section 4 of the Registration Regulation and applicable to every certificate of registration, TCLs may be placed on any member's certificate of registration following due process.

g) Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

from January 1 st to December 31 st of the reporting year	Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)					
	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	1	0	0	0	0	1
Applicants who initiated an appeal of a registration decision	0	0	0	0	0	0
Appeals heard	0	0	0	0	0	0
Registration decisions changed following an appeal	0	0	0	0	0	0

Enter "n/a" if you do not track this information. Enter "0" if you track the information, but the correct value is zero.

Additional comments:

Please identify and explain the changes in your registration practices relevant to this section that occurred during the reporting year.

There were no changes in the registration practices during the reporting year. Work is ongoing to facilitate continuous improvement in registration application processing and provision of information.

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13. Submission

I hereby certify that:

Name of individual with authority to sign on behalf of the organization:

Andrew Parr

Title:

Registrar and CEO

Date:

2016/03/02

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