## Public Protection.

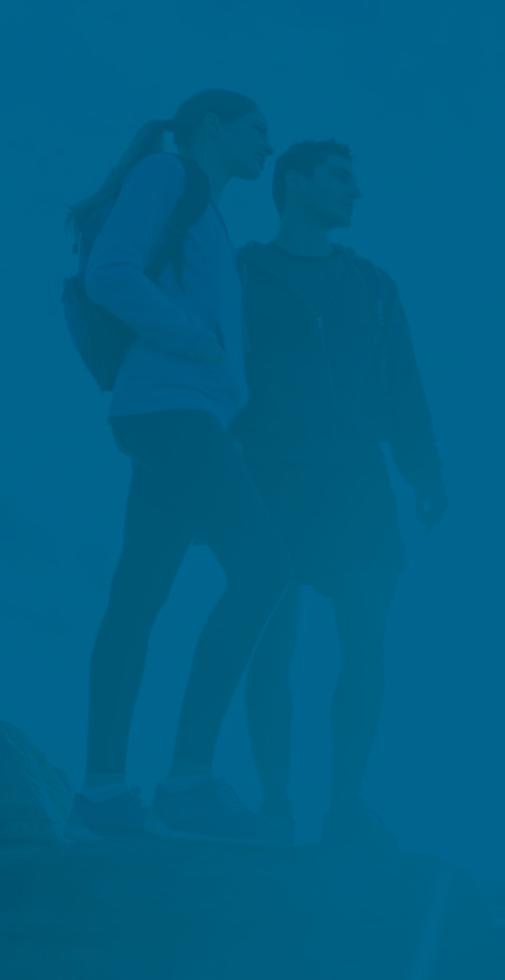
Patient Safety.

2018/19 Annual Report

April 1, 2018 to March 31, 2019



College of Naturopaths of Ontario



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Formal 2018/19 reports from our Statutory Committees are <u>available on our website</u> and were approved by our governing Council at its July 2019 meeting.

## **ABOUT US**

### Protecting the public. Supporting safe practice.

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

### 4 Key Functions of Regulation

We achieve our mandate through four key functions:

#### 1. Registering Competent, Ethical, and Qualified Individuals

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

#### 2. Setting Standards

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

#### 3. Ensuring Continuing Competence

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

#### 4. Providing Accountability through Complaints and Discipline

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

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



## **GOVERNANCE**

### Letter from the President

As I write this, it's been four years to the day since the College of Naturopaths of Ontario was established.

We were no stranger to regulation then, but we faced a challenge that would define us: could we unite as a diverse and fiercely independent profession as we moved into a new era for naturopathic medicine?

It was a question that I lost a lot of sleep over.

Now, just four short years later, I'm convinced the answer is yes. I couldn't be more proud of where we are as both an organization and as a profession.

We are now respected partners across the span of regulators, health professions, government, and stakeholders. Our governing Council, committees and other volunteers are fully engaged in the idea of self-regulation in the public interest.

Every day, the College sees proof that Ontario naturopaths are meeting the standards for safe and effective practice and providing care that meets their patients' best interests.

Every day, the evidence mounts that our profession is committed to ongoing education, practice improvement, and learning. And best of all, every day I see sure signs that we're doing it *together*.

Self-regulation isn't easy. It can sometimes be frustrating and occasionally painful. But hidden in the idea of self-regulation is a gift to our profession: to do it requires us to come together. To effectively govern ourselves, we have to become something more – something that's larger than us as individuals.

That, more than anything, is what I'm most proud of. In the last four years we haven't just grown, we've grown closer – to each other, but also to the public and other health professions, too. We're now a trusted partner in providing health care to Ontarians, and we are going above and beyond in honouring that trust.

As my presidency ends, I would like to recognize the many members of the profession, College staff, and all our other partners for being part of our growth journey as a new regulator. We truly are in this together!

Dr. Tara Gignac, ND

President



## Council for the fiscal year 2018-2019

BACK ROW (L to R):

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

FRONT ROW (L to R):

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

Not pictured: **Harpal Buttar**; **Karim Dhanani**, ND; **Deborah Haswell**; **Rosemary Hnatiuk**, ND; **Scott Sawler**.

<sup>\*</sup> Elected for the 2019-2020 fiscal year

## Letter from the Registrar

Regulating a health profession is a complicated business. To make it more complicated, it differs slightly from one profession to another and more so from one province to another and from one country to another. On top of this, it's not the most interesting of topics to discuss and the average Ontarian doesn't really care about it until they feel compelled to bring a matter forward to one of the regulatory Colleges.

All of these challenges come to the forefront when the College undertakes an exercise like assembling an annual report. The report has to be interesting (pithy as some might say) to engage the reader, factually accurate (so as not to mislead anyone), brief (so as not to lose the reader), and relevant (answering questions such as "So what? Now what?").

The cynic among us will likely be saying "Good luck, it's not truly possible." Nonetheless, we will give it a good solid effort.

Why do we regulate? Some might argue that being regulated gives credibility to a health profession; however, the costs to the profession far outweigh the benefit they receive. We don't regulate for the benefit of the profession, we do so for the benefit of the public. More and more, the public is seeking out the services of a wide variety of health professions and as they do so, the public is entitled to protection.

Followers of the concept of "regulation", in particular those of us who work in the field, will bandy about key words like public protection, public safety, and the public interest. The simple reality is that every activity this College undertakes must be intended to benefit the public in Ontario. How our actions serve the public needs to be brought to the forefront. We hope that this annual report does this for our readers.

Andrew Parr, CAE Registrar and CEO

# REGISTRATION & EXAMINATIONS

Registering Competent, Ethical, and Qualified Individuals



#### **Overview**

This program area oversees:

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

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

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

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

- 1. North American clinical exam
- 2. North American biomedical exam
- 3. Clinical (Practical) Exam
- 4. Jurisprudence Learning Module

Administered directly by the College

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

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

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

### **Examinations**

During the reporting period, two of the examinations were administered by the North American body while the College administered the remaining two of the four examinations mentioned above that are used to determine a candidate's qualifications for registration as a naturopathic doctor in Ontario. The Clinical (Practical) Examination is a demonstration-based exam that assesses a candidate's entry-level competencies in naturopathic manipulation, acupuncture, and physical examination/instrumentation. The Jurisprudence Learning Module is an online, open-book, learning-oriented module that focuses on the legislation, regulations and standards of practice for the profession in Ontario.

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

#### **CLINICAL (PRACTICAL) EXAM STATISTICS**

	2017/18	2018/19
Overall Pass Rate	<b>85</b> %	86%
Number who sat exam	135	143
Total passed	115 100 (1st attempt) 13 (2nd attempt) 2 (3rd attempt)	123 106 (1st attempt) 17 (2nd attempt)
Failed*	<b>20</b> 10 manipulation 7 acupuncture 6 physical exam	20 11 manipulation 10 acupuncture 4 physical exam

<sup>\*</sup> The failed modality breakdown factors in candidates who failed more than one modality in their examinations attempt.

#### **JURISPRUDENCE LEARNING MODULE STATISTICS**

Enrollment in the Ontario Jurisprudence Exam increased slightly from 2017-18, on par with the increase in those sitting entry-to-practise Clinical examinations in 2018/19.



#### New entry-to-practise exam development

During the reporting period, the College continued its work on the development of two new entry-to-practise exams to replace the North American clinical and biomedical exams.

The new Clinical Sciences Examination was completed during the fiscal year in preparation for the first administration of the exam in June 2019. This is a computer-based written exam focusing on the clinical science skills needed to be a naturopathic doctor. It augments the College's existing Clinical (Practical) Examinations in assessing a candidate's qualifications.

Work also continued on development of the College's new Biomedical Exam, with initial pilot testing of content held in the Spring of 2019. The Biomedical Exam will also be a computer-based written examination that focuses on a candidate's knowledge of the biomedical aspects for qualification as a naturopathic doctor. We anticipate launching this exam in 2020.

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

Yardstick Assessment Strategies – a leading psychometrics firm – helped guide the development process of both exams.

#### **Examination Appeals Committee**

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

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

## Initial Registration (Entry-to-Practise)

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

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

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

INITIAL REGISTRATION STATISTICS

**APPLICATIONS RECEIVED** 

2017/18 2018/19
111 145
114 119

CERTIFICATES ISSUED\*

<sup>\*</sup> The number of applications received and certificates issued may not always align due to when they were received, deferrals, and other mitigating factors.

## Registration Committee

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

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

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

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

#### **Referrals to the Registration Committee**

	2017/18	2018/19
Total referrals	10	11
Good character review only	4	1
Currency only	3	8
Currency & good character (both)	3	2

#### **Registration Committee Outcomes**

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

	2017/18	2018/19
Certificate issued at application	7	6
Certificate issued after completing added exams or education	3	3
Certificate issued with terms, conditions or limitations	-	-
Denied registration	-	2

Decisions of the Registration Committee, with the exception of a decision to direct the Registrar to issue a certificate of registration, can be appealed to the Health Professions Appeal and Review Board. The Board is discussed in more detail on page 36.

## Members of the College

#### Registration renewal

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

There are two classes of registration:

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

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

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

## Registration by class (# of Members)

(# OI IVIEMBE	S)	
	2017/18	2018/19
General Class	1,382	1,424
Inactive Class	153	152
General Class	11	15
Total	1,546	1,591

### Renewal statistics

2017/18

2018/19

% renewed on-time

97%

95%

# resignations

26

42

# revocations

13

116\*

# new Members

114

119

\* As set out in section 16 of the Registration Regulation, a Member's certificate of registration is revoked on the day that is two years after the date on which it was suspended if the suspension has not been lifted. July 1, 2017 marked the two-year anniversary since proclamation and with that anniversary, section 16 of the Registration Regulation came into effect. Those Members who had been suspended under the Board of Directors of Drugless Therapy-Naturopathy, and became suspended Members of the College at proclamation, were provided with 45 days' notice of intent to revoke and subsequently revoked in September 2018.

#### **Referrals to the Registration Committee**

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

- Members who wish to change their class of registration from Inactive to Active where they have been inactive for more than two years;
- Members who have been suspended for more than two years who wish to be reinstated (usually upon being given notice of the intent of the College to revoke a certificate of registration that has been suspended for more than two years); and
- applications from Members for Life Membership.

There were twice as many referrals for post-registration Membership-related items than in the previous fiscal year.

	2017/18	2018/19
Class change	2	5
Life Membership	4	4
Reinstatement	_	3

# Post-registration Examinations for Extended Services

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

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

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

#### **Prescribing and Therapeutics Exam**

This exam tests a candidate's competency to be able to develop, implement and monitor evidence-based therapeutic plans, including whether they have the relevant knowledge to use the drugs and substances listed in the tables of the College's *General Regulation*.

80 Members met the *Standard* of *Practice for Prescribing* in 2018/19. In total, 669 Members, or about 42% of the profession, have passed the exam since its inception in June 2014.

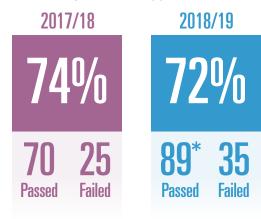
#### Enrollment in the exam increased by 38% in 2018.

This is likely due to the focus on prescribing in College communications and the change of policy (affecting the October 2018 exam session) which opened course and exam enrollment to fourth year CNME-program students and NDs registered in other regulated Canadian jurisdictions. Of the 66 individuals who sat the exam in the October 2018 session, 33 were enrolled in their fourth year at the Canadian College of Naturopathic Medicine (CCNM).

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#### **Prescribing Exam**

#### **OVERALL PASS RATE**



## PRESCRIBING EXAM FAILURES BY COMPONENT



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

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

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

#### **Intravenous Infusion Therapy Exam**

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

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

36 Members were deemed to have met the *Standard of Practice for IVIT* in 2018/19. In total, 145 Members have passed the exam since its inception in July 2016.

	2017/18	2018/19
PASSED	<b>35</b> (62.5%)	<b>51</b> (78.4%)
FAILED	21	14
	IVIT EXAM FAILURE	S BY COMPONENT
OSMOLARITY	16	6
WRITTEN MCQ*	8	3
PRACTICAL	2	-
OSM & MCQ**	3	-
PRACTICAL & MCQ	-	1

<sup>\*</sup> multiple choice questions

<sup>\*\*</sup> osmolarity and multiple choice questions

## **Professional Corporations**

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

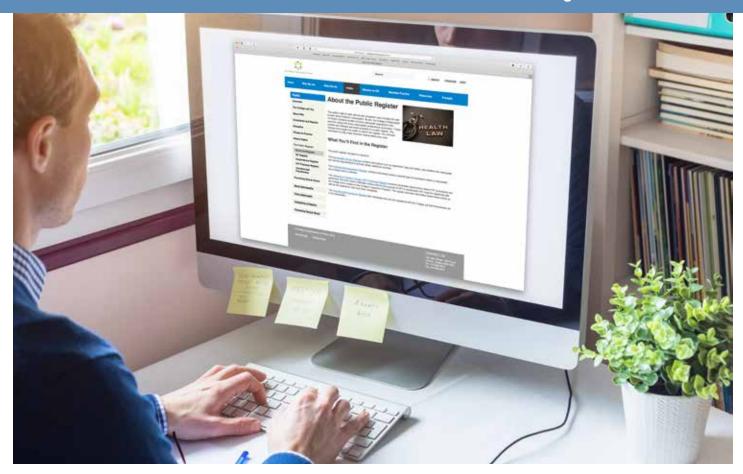
As of March 31, 2019, the College had issued a total of 50 Certificates of Authorization for Naturopathic Professional Corporations.

### **CORPORATION APPLICATIONS DATA**

	2017/18	2018/19
NEW APPLICATIONS	14	9
APPROVED	13	9
DENIED	_	
CLOSED FOR INCOMPLETENESS	1	_

RENEWALS APPROVED FOR EXISTING CORPORATIONS

15 2017/18 2018/19



## The Public Register: Information about all Ontario naturopaths

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

1

The <u>Naturopathic Doctor Register</u> contains detailed information about all naturopaths registered with the College, including their registration type and status, practice information, and whether they have met the requirements to provide certain additional services.

2

The <u>Professional Corporations Register</u> contains information about a type of corporation where a naturopath owns shares and is a director.

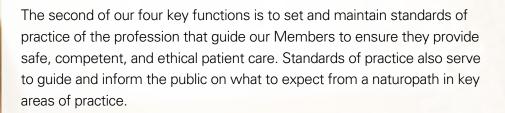
3.

The <u>Intravenous Infusion Therapy (IVIT) Premises Register</u> identifies clinics where IVIT is offered, including whether a premises is registered with the College and authorized to provide IVIT at that location.

4.

The <u>Unauthorized Practitioner Register</u> lists people who are not registered with the College but who refer to and/or present themselves as naturopaths. Holding themselves out to be a regulated health professional is illegal.

## SETTING STANDARDS



#### Standards and Guidelines for the Profession

The College has established and maintains 29 standards of practice including:

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

The College has also established and maintains 10 <u>practice guidelines</u> to help Members and the public understand how the standards might best be implemented. Some key guidelines include:

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

## Regulatory Guidance

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



The number of inquiries has stayed relatively consistent since the College was established in 2015, but the topics we are asked about the most have changed. Questions about advertising and delegation are no longer in the top 10. However, based on calls and submissions to our Complaints department about advertising, we have noted an anecdotal increase in overall public awareness about advertising standards for naturopaths, including how the College exists to protect the public's interest. Our webpage <a href="Advertising">Advertising</a>, Websites and Social Media includes information about how the Standard of Practice for Advertising applies to various marketing platforms.

This past year, Members asked more questions about situations that may be a conflict of interest and about the scope of practice of the profession in Ontario. Changes to mandatory reporting requirements for parking and speeding tickets also prompted many questions from Members.

Questions about the Inspection Program, fees and billing, consent, telemedicine, and lab testing are consistently the topics that Members ask us about the most.

#### **TOP 10 TOPICS**

	2017/18	2018/19
Inspection Program	147	99
Fees and billing	72	67
Notifying patients and the transfer of records when leaving a clinic	41	62
Laboratory tests	52	59
Scope of practice in Ontario	45	57
Mandatory reporting	_	<b>52</b> *
Consent and privacy issues	38	48
Prescribing	44	47
Telemedicine	31	43
Potential conflicts of interest	18	34

<sup>\*</sup>Significant changes to mandatory reporting were introduced on May 1, 2018 for all regulated health professionals in Ontario.

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

## 5 most frequently-accessed topics during the reporting period

- Prescription and Non-prescription Drugs and Substances Information
- 2. Non-Medical (Recreational) Cannabis Guideline
- 3. Telemedicine Providing Naturopathic Care at a Distance
- 4. <u>Advertising and Bio Do's and Don'ts</u> (now including social media tips)
- 5. <u>Reporting Adverse Reactions and Side Effects</u> to Health Canada

Each issue of our *News Bulletin* includes a practice-related FAQ. Topics this reporting period included:

- Can I send my patient to their medical doctor for laboratory tests?
- I know I can't provide information to my patients about vaccinations since it is outside of the scope of practice, but what can I say about other forms of treatment that I feel strongly about?
- If I already reported a speeding ticket to the College do I need to report it again on the <u>Self-Reporting Form</u>?
- Do I have to report speeding and parking tickets from before May 1, 2018?
- Do I have to report a parking ticket that I received but didn't have to pay after I challenged it in court?
- I haven't had an inspection yet, do I have to have my Policies and Procedures Manual done or can I wait until I have the inspection?
- I have been approached by a supplement company to work for them and recommend herbal formulas and order tests for their clients. Am I able to do this?

- What devices does the College allow me to use with patients?
- Are we permitted to release laboratory results to a patient at their request without first reviewing them at their visit?
- Can I change my class of registration during the renewal period?

## Ongoing Review of Standards and Guidelines

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

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

#### **STANDARD & GUIDFLINF REVIEW STATISTICS**

	2017/18	2018/19
Standards reviewed	6	6
Standards amended	6	6

	2017/18	2018/19
Guidelines reviewed	2	2
Guidelines amended	2	1
Guidelines created	-	1*

<sup>\*</sup> Non-Medical (recreational) Cannabis

# Standards for Premises Doing Intravenous Infusion Therapy (IVIT)

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

#### IVIT procedures include:

- compounding<sup>1</sup> drugs to make a customized therapeutic product for administering to a patient by IV injection, and
- administering a therapeutic product by IVIT.

## The Inspection Program: Putting patient safety at the forefront

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

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

#### **Inspection Committee**

The Inspection Program is supported by a volunteer Inspection Committee of IVIT-qualified naturopaths and a member of the public. The Inspection Committee met 10 times during the reporting period and delivered 140 inspection outcomes (results) to existing and new premises.

INSPECTIONS COMPLETED		
	2017/18	2018/19
EXISTING PREMISES	42	81
NEW PREMISES – PART I*	8	20
NEW PREMISES – PART II**	-	11

As required in the General Regulation, all existing premises were inspected prior to March 1, 2019, and all new premises were inspected (Part I) within 180 days of being registered.

<sup>\*</sup> Part I occurs prior to any IVIT procedures being performed and includes the program requirements that must be in place in order to be fully prepared to provide safe and competent IVIT procedures.

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

<sup>&</sup>lt;sup>1</sup> The process of combining, mixing, or altering ingredients to create a medication tailored to the needs of an individual patient.

INSPECTION OUTCOMES	2017/18 # OF PREMISES	2018/19 # OF PREMISES
Final outcome of a pass	31	75
Preliminary outcome of a pass with conditions and final outcome of a pass	15	29
Preliminary outcome of a pass with conditions and final outcome of a pass with conditions	3	2
Preliminary outcome of a pass with conditions, final outcome not delivered in 2018-2019 fiscal y		3
Preliminary outcome of a fail and a final outcome of a pass	1	_

#### Reporting Type 1 Occurrences

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

Type 1 occurrences are:

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

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

Type 1 Occurrences Reported	Number	
	2017/18	2018/19
Any referral of a patient to emergency services within the five days following the performance of a procedure at the premises.	5	12
The administration of an emergency drug to a patient immediately following an IVIT procedure.	-	2
The death of a patient that occurs within five days following the performance of a procedure at the premises.	1	1

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

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

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

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

#### Reporting Type 2 Occurrences

All premises where intravenous infusion therapy (IVIT) procedures are performed are also required to track Type 2 occurrences and must report these to the College every year. All premises submitted their first Type 2 occurrence reports in May 2018.

Type 2 occurrences are:

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

Type 2 Occurrences Reported	Number Reported**	
	March 2, 2017 – March 1, 2018	March 2, 2018 – March 1, 2019
Infections occurring in a patient in the premises after an IVIT procedure was performed at the premises.	9	2
Unscheduled treatments of a patient by a Member occurring within five days after an IVIT procedure was performed at the premises.	8	7
Adverse drug reactions occurring in a patient after an IVIT procedure was performed at the premises.	61	91

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

<sup>\*</sup> Adjunctive care is treatment that is in addition to other forms of care a patient is receiving.

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

## Patient Relations Program

A Patient Relations Program is mandated under the legislation governing the College. The Program is responsible for developing and delivering measures for preventing and dealing with sexual abuse of patients. It does so by establishing educational requirements for Members, creating guidelines for conduct of Members with patients, training College staff, and providing information to the public.

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

Important changes to enhance this program were brought forward by the Ontario Government and implemented by the College. A significant change allows patients to be eligible for funding for counselling for alleged sexual abuse without having to wait for approval to be granted via a Discipline Committee hearing (as was previously the case). Under this new structure, the Committee received and approved four applications.

The Committee also developed, consulted on, and launched new Patient Rights information for dissemination through naturopathic clinics to educate patients about their rights in that professional relationship. The Committee also developed, widely consulted on, and submitted a regulation on the Cessation of Funding for Therapy to the Ontario Government. This is an important element of stopping funding when it may no longer be warranted and as a means of preventing misuse of the program.

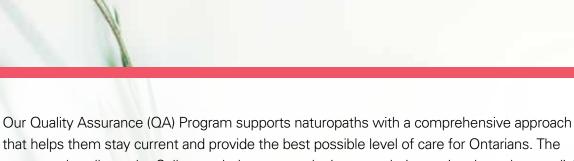
## Scheduled Substances Review Committee

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

The Committee initiated a public consultation on February 2, 2019 of proposed amendments to the list of drugs/ substances allowed in the *General Regulation*, and a list of recommendations for laboratory tests. This was not a new consultation, but built on the Committee's initial consultation in 2017. That consultation formed the basis for the list of priority 1 drugs, substances and lab tests approved by Council for further investigation as potential additions to the lists of those which NDs are allowed to prescribe or order.

## **QUALITY ASSURANCE**

## **Ensuring Continuing Competence**



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

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

The Program has three components.

### 1. Self-Assessment

This component helps naturopaths reflect on their skills with respect to the core competencies and standards of practice of the profession and supports them to develop an annual learning plan to guide their competency and professional development activities.

In 2018/19, 97.8% of Members had completed their self-assessment and learning plan by the deadline, compared with a completion rate of 99% the previous year.

## 2. Continuing Competency and Professional Development

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

#### **CE REPORTING**

# of Members required to report CE	2017/18 <b>398</b> (GROUP III)	2018/19 433 (GROUP I)
% submitted CE logs by deadline	98%	91%
CE log extensions/ amendments granted	9 OUT 1 1 REQUESTS	8 OUT 8 REQUESTS

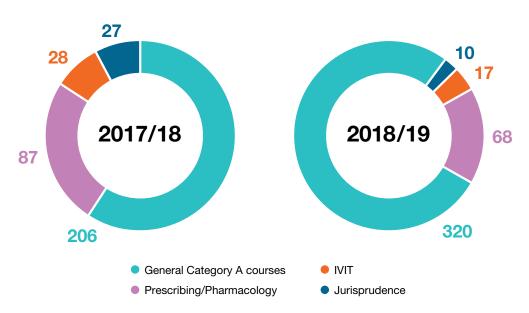
**Category A** - The College approves specific courses to be eligible for Category A Continuing Education (CE) credit. These courses are structured learning activities that address the core clinical competencies of the profession.

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

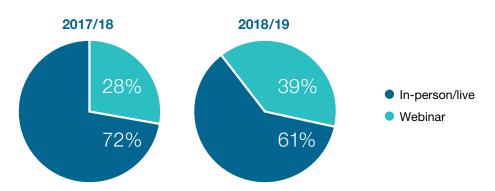
#### **NUMBER OF APPROVED CATEGORY A COURSES**

	2017/18	2018/19
Category A credit applications received	391	402
% approved	89%	93%

#### APPROVED CATEGORY A COURSES BY CATEGORY



#### **COURSE DELIVERY MODALITIES**



### 3. Peer and Practice Assessment

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

Of the 75 naturopaths randomly selected, four were deferred and removed from the selection pool; another Member changed their registration class to Inactive; and two others were suspended for non-

payment of fees. Sixty-eight assessments were completed in total (compared with 39 the previous year). The increase in the number of assessments was due to the Quality Assurance Committee's decision to increase the number during the reporting period. No assessments were referred to the Quality Assurance Committee for further review, and all Members received high ratings of 1 or 2 on a scale of 4.



## Inquiries, Complaints and Reports Committee (ICRC)

The College receives complaints and reports about the practice and conduct of naturopaths. All complaints are investigated. With approval from the ICRC, the College Registrar and CEO may also initiate investigations where reported information suggests reasonable and probable grounds to believe a naturopath may have engaged in professional misconduct or is incompetent. The results of investigations are considered by the ICRC, which may take no action, order a range of educational or remedial activities, or refer a naturopath to the Discipline Committee or the Fitness to Practise Committee for a hearing.

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

#### **ICRC CASES**

2017/18 2018/19
21 20
COMPLAINTS
RECEIVED

2017/18 2018/19
10 14

REGISTRAR'S
INQUIRIES INITIATED\*

2017/18 2018/19
34 40

MATTERS CLOSED

#### \* ORIGINS OF REGISTRAR'S INQUIRIES

	2017/18	2018/19
Public inquiries	6	6
Matters reported by Members	-	1
Matters reported by insurance company	4	1
Matters reported by Professional Conduct department	4	1
Referral from ICRC to Registrar	2	4
Referral from another regulator	1	1



The ICRC took the following actions in response to the complaints/reports reviewed. All decisions made by the ICRC can be appealed to the independent Health Professions Review Board, which is discussed in more detail on page 36.

	2017/18	2018/19
TOTAL decisions	34	40
No further action	8	6
Letter of advice/counsel	13	19
Oral Caution	3	4
Specified Continuing Education and Remediation Program (SCERP)	2	2
SCERP & Oral Caution	3	3
Acknowledgement & Undertaking	2	1
Referral to Fitness to Practise Committee	-	_
Referral to Discipline Committee	2	5
Frivolous and vexatious	1	_

	2017/18	2018/19
Advertising	17	15
Inappropriate billing procedures	3	6
Inappropriate/unsatisfactory patient care	8	5
Practising outside their Scope	-	5
Failure to comply with the Standard for IVIT/Injections	8	2
Sexual abuse, violation of professional boundaries	3	2
Failure to cooperate or comply with an order of Discipline Committee/ICRC	2	2
Practising while Inactive/Suspended	3	1

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

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

#### Investigation timelines: Complaints/Registrar's Reports

	2017/18 # of days	2018/19 # of days
Average length	180	164
Shortest	41	34
Longest	465	505

The legislation governing the College requires that a complaint be completed within 150 days and, in cases where that timing cannot be met, the complainant, the Member, and the Health Professions Appeal Board are notified every 30 days. While the average time frame of 164 days above is over the 150 day period anticipated in the legislation, it is generally a positive indicator as it demonstrates our intent of processing such matters expeditiously, in fairness to both the public and Members.

The longest timeframe of 505 days involves a situation where the matter is before the Courts and we placed our processes on hold while awaiting an outcome from the criminal processes.

#### Investigation costs: Complaints/Registrar's Reports

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

	2017/18	2018/19
Average cost to		
the College	\$2,364	\$2,198
Highest cost	\$9,638	\$12,846
Lowest cost	\$156	\$150

## ICRC & Fitness to Practise

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

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

## Discipline Committee

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

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

#### Informing the public

Information about upcoming discipline hearings is posted in the News & Announcements section of our website. Summaries of every discipline decision, and the reasons for them, are published in our quarterly newsletter, *iNformeD*, and included in every annual report. Copies of discipline Decisions and Reasons are posted on the Public Register and in both official languages (as of 2019) on the Discipline Outcomes webpage indefinitely.

#### **Discipline statistics**

	2017/18	2018/19
Discipline hearings completed	1	2
Findings of professional misconduct	1	1
Number of hearing days	1	6
Number of referrals from ICRC	2	5
Fitness to Practise hearings	-	-
Reinstatement hearings	-	-
Divisional court reviews	-	-

#### Discipline hearings completed: 2

**Rahim Kanji**, file #DC16-02 referred by the ICRC on June 1, 2017.

The Member was found guilty of professional misconduct. Number of Hearing Days: 1

**Dr. X Y, ND,** file #DC17-02 referred by the ICRC on October 12, 2017.

The Discipline Panel found that the College failed to discharge its onus of proving with clear, cogent, and convincing evidence that the Member engaged in professional misconduct as alleged in the Notice of Hearing. Since the Panel's deliberations resulted in no finding of professional misconduct, the College is prohibited from publishing the Member's name. Number of Hearing Days: 5

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

- 1. File #DC18-01, Dr. Taras Rodak, ND
- 2. File #DC18-02, Dr. Anthony Yores, ND
- 3. File #DC 18-03, Dr. Elvis Ali, ND
- 4. File #DC18-04, Dr. Michael Yarish, ND
- 5. File #DC19-01, Dr. Leslie Ee, ND

#### **Costs: Discipline matters**

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

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

#### Rahim Kanji, file #DC17-01

· Legal costs and expenses: \$36,383

• Hearing costs: \$4,106

The Panel ordered the Member to pay the College's costs fixed in the amount of \$13,000, which amounted to 32% of the College's costs.

Total cost to the College: \$27,489.

#### Dr. X Y, ND, file #DC17-02

Legal costs and expenses: \$74,668

• Investigation costs: \$4,869

Hearing costs: \$6,141

Total cost to the College: \$85,678.

## Fitness to Practise Committee

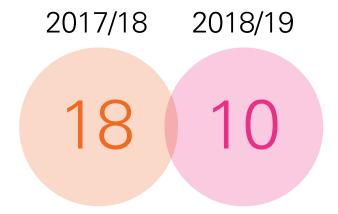
The Fitness to Practise Committee conducts hearings when a panel of the ICRC refers matters to do with a Member's capacity. Mental health or substance abuse issues are examples of factors that may impact a naturopath's capacity to practise safely and may result in a Fitness to Practise referral.

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

### **Unauthorized Practice**

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

#### Cease and desist letters issued



## Discipline Decision Summary

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

Dr. Rahim Kanji, ND\* Registration #1939

Hearing Date: April 9, 2018

Summary of Allegations:

- Prescribing a drug, in particular Vitamin A over 10,000 IU, that the Member had no authority to prescribe;
- · Failure to manage the risks of using that drug;
- · Failure to obtain the patient's informed consent;
- Failure to identify vitamin A toxicity;
- Failure to maintain appropriate records when prescribing a drug; and
- Failure to appropriately communicate with the patient.

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

#### **Admission of Professional Misconduct**

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

#### Order

The Discipline Panel imposed an order:

- 1. Requiring the Member to appear before the Panel to be reprimanded on a date to be scheduled.
- Directing the Registrar to suspend the Member's certificate of registration for a period of six months, immediately following this hearing of the Discipline Committee.
- 3. Imposing the following specified term, condition and limitation on the Member's certificate of registration:
  - a. the Member shall successfully complete by November 30, 2018 the satisfaction of the Registrar and at his own expense, the ProBe course in ethics and/or jurisprudence;
  - b. the Member shall successfully complete by November 30, 2018, to the satisfaction of the Registrar and at his own expense, the Medical Records Course at the University of Toronto; and
  - c. the Member shall successfully complete, to the satisfaction of the Registrar and at his own expense, up to three meetings with a Regulatory Expert within 12 months following the lifting of the suspension.
- 4. Requiring the Member to pay the College's costs fixed in the amount of \$13,000 on a schedule to be determined by the Registrar.

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

\* Mr. Kanji resigned his registration with the College on December 6, 2018 and is currently not authorized to use the titles Dr or ND in Ontario.

# HOLDING THE COLLEGE ACCOUNTABLE

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

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

#### Ministry of Health

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

In the 2018-2019 reporting period:

- R. Gail Goodman was reappointed for a one-year term on March 28, 2019, and
- three-year terms concluded for Harpal Buttar on December 15, 2018 and for Deborah Haswell on March 8, 2019.

## Health Professions Appeal and Review Board (HPARB)

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

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

#### **Registration Decisions**

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

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

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

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

	2017/18	2018/19
Appealable RC decisions	3	3
Decisions appealed	_	_
Outcomes	_	_

#### **Complaint Decisions**

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

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

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

	2017/18	2018/19
Appealable ICRC decisions	14	25
Decisions appealed	1	-
Outcomes	-	1*

<sup>\*</sup> In this matter, HPARB decided not to proceed with a review of the ICRC decision.

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

## Office of the Fairness Commissioner of Ontario

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

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

We take this report and the role of the OFC very seriously. As a result of the report, an action plan has been developed that will see the College adopt the recommendations of the OFC over the next three years. Work is well underway in this regard.

#### **Human Rights Tribunal of Ontario**

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

discrimination and harassment brought under the *Human Rights Code*.

In 2016, a College Member filed a claim against the College with the HRTO alleging that the College's Quality Assurance Committee discriminated against them. In this past fiscal year, the HRTO agreed with the College's assertion that the matter was beyond its jurisdiction based on provisions in the Regulated Health Professions Act, 1991 (RHPA) and Schedule 2, the Health Professions Procedural Code. This was an important ruling. It confirmed the RHPA's confidentiality provisions that protect Members who may disclose information about areas where they may need to further hone their skills within the QA program from being prosecuted before the courts [for disclosing that information when a formal complaint or concern has not been made about their practice]. This ensures naturopaths can participate in Quality Assurance activities in a meaningful way, free of reprisal.

#### The Courts

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

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

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



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



### **Engagement**

#### **Member communications survey**



86% OVERALL SATISFACTION WITH MEMBER COMMUNICATIONS

21% IMPROVEMENT SINCE 2016

#### Stakeholder meetings

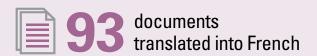
- 1. Canadian Association of Naturopathic Doctors (CAND)
- 2. Canadian Alliance of Naturopathic Regulatory Authorities (CANRA)
- 3. Canadian College of Naturopathic Medicine (CCNM)
- 4. Ontario Association of Naturopathic Doctors (OAND)
- 5. Naturopathic Students Association (NSA CCNM)
- 6. Regulatory Communicators' Network

### **Citizen Advisory Group**

We sought patient and caregiver input about our Patient Rights handout and about new ways to engage the public.

#### **OAND Annual Convention**

- **1-On-1** contact with 65+ Members and other stakeholders at booth
- Offered informal, on-site ND website reviews for alignment with Advertising Standard





Created French webpage

38 College of Naturopaths of Ontario



#### **Online communications**

Readership rates well above the industry norm

iNformeD

newsletters

9 aws Rulle:

News Bulletin e-newsletters

16

blog posts for 1,422 total unique pageviews



384,282
UNIQUE PAGEVIEWS



- Home page
- Public Register
- Public Register Overview

### **Support to College programs**

- » Ongoing Communications counsel
- » Media relations & issue management
- Communications for new ETP exam launch
- Writing & editing: newsletters, website, annual report, surveys
- » Registration renewal

## SUMMARY FINANCIAL STATEMENTS



#### NOTE TO SUMMARY FINANCIAL STATEMENTS

Our website includes an explanatory *Statement on Financial Results* to provide readers with overall context about the favorable outcome of the College's financial position at the end of the 2018/19 fiscal year.

The summary financial statements have been prepared from the audited financial statements of the College of Naturopaths of Ontario for the year ending March 31, 2019. The information in the summary financial statements is in agreement with the related information in the complete financial statements and contains the necessary information to avoid distorting or obscuring matters disclosed in the related complete financial statements.

Complete audited financial statements are available on the College website and may also be obtained by emailing us at <a href="mailto:info@collegeofnaturopaths.on.ca">info@collegeofnaturopaths.on.ca</a>.

### INDEPENDENT AUDITORS' REPORT

Report of the independent auditor on the summary financial statements to the Council of the College of Naturopaths of Ontario.

#### **Opinion**

We have audited the financial statements of The College of Naturopaths of Ontario, which comprise the statement of financial position as at March 31, 2019, and the statements of operations and changes in net assets and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of The College of Naturopaths of Ontario as at March 31, 2019, and the results of its operations and its cash flows for the year then ended, in accordance with Canadian accounting standards for not-for-profit organizations.

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

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

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

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

#### Auditor's Responsibilities for the Audit of the Financial Statements

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

Kriens-Larose, LLP
Chartered Professional Accountants
Licensed Public Accountants

Toronto, Ontario July 31, 2019

## **Summary Statement of Financial Position**

March 31

	2019 \$	2018 \$
ASSETS		
CURRENT		
Cash	4,605,778	4,018,582
Accounts receivable	191,357	153,549
HST receivable	9,007	47,869
Prepaid expenses	83,681	103,008
	4,889,823	4,323,008
EQUIPMENT	26,632	27,182
	4,916,455	4,350,190
LIARILITIES		
LIABILITIES		
CURRENT	134.327	121.641
	134,327 2,413,129	121,641 2,253,919
CURRENT Accounts payable and accrued liabilities		
CURRENT Accounts payable and accrued liabilities	2,413,129	2,253,919
CURRENT Accounts payable and accrued liabilities Deferred revenue  NET ASSETS	2,413,129 2,547,456	2,253,919
CURRENT  Accounts payable and accrued liabilities  Deferred revenue	2,413,129	2,253,919
CURRENT Accounts payable and accrued liabilities Deferred revenue  NET ASSETS  Unrestricted net assets	2,413,129 2,547,456 2,199,504	2,253,919 2,375,560 1,794,627
CURRENT Accounts payable and accrued liabilities Deferred revenue  NET ASSETS  Unrestricted net assets Patient relations	2,413,129 2,547,456 2,199,504 94,110	2,253,919 2,375,560 1,794,627 100,000

## **Summary Statement of Operations and Changes in Net Assets**

Year Ended March 31

	2019 \$	2018 \$
REVENUES		
Registration and member renewal fees	2,426,324	2,247,777
Inspection and hearing fees	223,900	187,500
Examination fees	160,805	136,910
Interest	40,377	17,485
Incorporation fees	17,350	17,950
Deferred capital funding	-	18,490
TOTAL REVENUES	2,868,756	2,626,112
EXPENSES		
Salaries and benefits	1,141,723	1,129,858
Rent and utilities	264,217	260,465
Office and general	169,765	151,727
Consulting fees		
Consultants - General	147,992	108,267
Consultants - Assessors/inspectors	84,910	52,353
Consultants - Complaints and inquiries	22,891	21,578
Legal fees		
Legal fees - Complaints	146,476	101,491
Legal fees - Discipline	89,040	49,092
Legal fees - General	67,457	75,171
Exam fees and expenses	128,665	72,344
Public education	42,301	15,543
Equipment maintenance	31,177	36,324
Insurance	26,773	27,026
Council fees and expenses  Travel accommodation & meals	24,106	21,639
Audit fees	22,833	29,776 14,785
Discipline & FTP committee	15,980 14,610	14,700
Amortization	12,918	32,653
Patient relations committee	9,624	32,033
Education and training	8,715	9,122
Printing and postage	2,214	3,200
TOTAL EXPENSES	2,474,387	2,212,414
EXCESS OF REVENUES OVER EXPENSES FOR THE YEAR	394,369	413,698

## **THANK YOU VOLUNTEERS!**

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

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

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

#### **Examiners**

Melvia Agbeko, ND Pearl Arjomand, ND Kinga Babicki-Farrugia, ND Deborah Berg, ND Stephen Buzzelli, ND

Natalie Cheng-Kai-On, ND

Christine Cho, ND Gabriella Chow, ND

Ashley Chauvin, ND

Kendra Clifford, ND Ian Cole, ND

Jackie Colello, ND

Rachel Corradetti-Sargeant,

ND

Eytan Cowen, ND Salma El Kassaby, ND

Valerie Franc, ND

Sarah Giovinazzo, ND

Jasraj Jaswal, ND

Saira Kassam, ND

Jeanny Kim, ND Vivian Kwan, ND

Elaine Lewis, ND

Lena Ma, ND

Mary MacDonald, ND

Niki Nephin, ND

Rick Olazabal, ND

Stephanie Porter, ND

Stefan Rallis, ND

Kathleen Regan, ND

Patricia Rennie, ND

Emily Rotella, ND

Rupa Salwan, ND

Nicole Sandilands, ND

Lindsay Self, ND

Kitty Shang, ND

Ruchira Shetty, ND

Danielle Sinclair, ND

Lia Sonnenburg, ND

Laura Stix, ND

Anna Tournianski, ND

Laura Tummon Simmons,

ND

Hillary Webster, ND

Selene Wilkinson, ND

#### **Exams Related Committee**

Melvia Agbeko, ND Kinga Babicki-Farrugia, ND Nadia Bakir, ND

Lauren Bennett, ND

Sarah Bennett, ND

Christine Carew, ND

Ashley Chauvin, ND

Christine Cho, ND

Erin Enns, ND

Janna Fung, ND

Cyndi Gilbert, ND

Sarah Giovinazzo, ND

Adam Gratton, ND

Sandy Huynh, ND

Neemez Kassam, ND

Andrew Krause, ND

Urszula May, ND

Emily Murphy, ND

Erin Psota (Walsh), ND

Chris Roberts, ND

Laure Sbeit, ND

#### **IVIT Premises Inspectors**

Pearl Arjomand, ND Deborah Berg, ND Jacqueline Colello, ND Meera Dossa, ND

Julia Esposito, ND Jason Law, ND Kandis Lock, ND

Maureen MacDonald, ND

Michael Reid, ND

Orest Szczurko, ND

## Peer and Practice Assessors

Nadia Bakir, ND

Sharon Behrendt, ND

Emile Compan, ND

Michelle Richea, ND

Mary-Claire Seitz, ND

## PLAR Assessors (paper-based)

Michelle Richea, ND

Vaishna Sathiamoorthy, ND

#### **PLAR Working Group**

Melvia Agbeko, ND

Kimberlee Blyden-Taylor, ND

Paymon Saldrolsadot, ND

Zeynep Uraz, ND

Alan Vu, ND

## **COLLEGE COMMITTEES**

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

### **Statutory Committees**

These committees are required by law. Statutory Committee reports from the fiscal year are <u>available on our website</u>.

### Discipline / Fitness to Practise

Jordan Sokoloski, ND, Chair (as of December 2018)

R. Gail Goodman, Chair (April – November 2018)

Kim Bretz, ND

Shelley Burns, ND

Harpal Buttar (until December 15, 2018)

Dianne Delany

Karim Dhanani, ND

Tara Gignac, ND

Deborah Haswell

(until March 8, 2019) Rosemary Hnatiuk, ND

Samuel Laldin

Danielle O'Connor, ND

Enrique Olazabal, ND

Scott Sawler

Vaishna Sathiamoorthy, ND

Laure Sbeit, ND

Barry Sullivan

George Tardik, ND

#### **Executive**

Tara Gignac, ND, Chair Kim Bretz, ND Shelley Burns, ND Dianne Delaney Deborah Haswell (until March 8, 2019)

## Inquiries, Complaints and Reports

Erin Psota, ND, Chair Kim Bretz, ND Glenda Clark, ND (Ret.) Karim Dhanani, ND (until March 7, 2019) Deborah Haswell (until March 8, 2019) Sylvi Martin, ND Barry Sullivan

#### Inspection

Sean Armstrong, ND, Chair Tara Gignac, ND Rosemary Hnatiuk, ND Samuel Laldin Barry Sullivan

#### **Patient Relations**

Shelley Burns, ND, Chair Samuel Laldin Anthony Moscar, ND Danielle O'Connor, ND

#### **Quality Assurance**

Barry Sullivan, Chair Dianne Delany Tara Gignac, ND Rosemary Hnatiuk, ND Dielle Raymond, ND Elena Rossi, ND Jordan Sokoloski, ND

#### Registration

Danielle O'Connor, ND, Chair Shelley Burns, ND Dianne Delany (until April 26, 2018) R. Gail Goodman Rosemary Hnatiuk, ND (until April 26, 2018) Scott Sawler Jacob Scheer, DC, ND George Tardik, ND

### Non-statutory Committees

These committees are appointed by Council and are not required by law.

#### **Audit**

Elena Rossi, ND, Chair Harpal Buttar (until December 15, 2018) Jordan Sokoloski, ND

#### **Examinations Appeal**

George Tardik, ND, Chair Harpal Buttar (until December 15, 2018) Vaishna Sathiamoorthy, ND

#### **Nominations and Elections**

Karim Dhanani, ND, Chair (until March 7, 2018) R. Gail Goodman (until December 15, 2018) Gudrun Welder, ND

#### **Scheduled Substances Review**

(until March 8, 2018)
Kim Bretz, ND
Harpal Buttar
(until December 15, 2018)
Jean-Jacques Dugoua, ND
Madeleine Elton, ND
George Tardik, ND

Deborah Haswell, Chair



## **College Staff**

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

#### **Andrew Parr**

CAE, Registrar & CEO

#### **Daniella Abate**

Administrative Assistant, Professional Practice

#### Sahrish Ali

Senior Coordinator, Registration and Examinations

#### **Victoria Calozet**

Administrative Assistant, Communications/Adjointe Administrative, Communications

#### **Anita Hemmati**

**Examinations Coordinator** 

#### **Maryam Katozian**

Membership Coordinator

#### **Agnes Kupny**

Director, Operations

#### **Erica Laugalys**

Director, Registration and Examinations

#### Rebecca McBride

Administrative Assistant, Professional Conduct

#### Mary-Ellen McKenna

ND (Inactive), Manager, Professional Practice

#### **Syed Mehdi**

Finance and Administrative Officer

#### Jeremy Quesnelle

Deputy Registrar

#### Natalia Vasilyeva

Manager, Professional Conduct

#### **Haily Saboor**

Entry-to-Practise Coordinator

#### **Margot White**

Director, Communications and Lead, Community Engagement

#### **Monika Zingaro**

Administrative Assistant, Operations

<sup>\*</sup>as of September 30, 2019

The College exists to ensure that Ontarians who wish to seek the services of a naturopath have access to safe, competent, and ethical care.

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