The College of Naturopaths of Ontario

FACT SHEET

INSPECTION PROGRAM

Authority

The Inspection Program is established under Part IV of the *General Regulation* (Ontario Regulation 168/15), the By-laws of the College and the Inspection Program Policies approved by Council and amended from time-to-time.

Application

The Inspection Program applies to all clinics (premises) where one or both procedures of compounding for the purposes of, and/or administering intravenous infusion therapy (IVIT) to patients occurs.

Registering a Premises

Every location where a Registrant is intending to compound for and/or administer IVIT must become registered with the College. Registering is as easy as completing the Registering an IVIT Premises form and paying the $100 premises registration fee.

New premises are required to undergo the Part I of a new premises inspection, and receive an outcome of a "pass" or "pass with conditions" from the Inspection Committee **prior to** offering any IVIT related services to patients.

A premises that registers as an existing or new premises, and then moves the practice to a new location where IVIT is not currently being performed is considered to be a new premises and must register as such and undergo an inspection before offering IVIT procedures at the new location.

Designated Registrant

Every premises must have an ND who is the designated Registrant (DR). The DR is responsible for:

- all communications with the College,
- submitting all forms,
- ensuring the Inspection Program Requirements are met, and
- paying all Inspection Program fees on behalf of the premises.

Initial Inspection Schedule

The initial inspection of a newly registered premises will occur in two parts. Part I of a new premises inspection is scheduled when the premises is prepared for (but prior to) providing IVIT services. Part II is scheduled approximately six months after the clinic receives an outcome of a "pass" or "pass with conditions" and has been performing IVIT procedures as observation of the provision of services is required.

Subsequent Inspections

After the Part I and Part II inspections are completed, subsequent inspections must occur within five years of the date of the initial inspection and every five years thereafter.

Inspection Process

The inspection process includes:

- Notification of an upcoming inspection is sent to the DR.
- DR submits the Pre-Inspection Information and Declaration of a Conflict of Interest forms, and the premises' Policies and Procedures Manual within 14 days. This is required for Part I and five-year premises inspections.
- Inspection is scheduled within 30 days of being notified of the assigned inspector.
- Inspection outcome is delivered within 60 days of the inspection being completed.

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Inspection Report & Outcomes

The outcome of an inspection derives from the inspection report submitted by the inspector for review by the Inspection Committee. The Committee will determine an outcome that falls into one of three categories:

- "Pass" – all Inspection Program Requirements are met or partially met with minor deficiencies,
- "Pass with conditions" – one or more Inspection Program Requirements are not met that could impact patient safety,
- "Fail" – few of the Inspection Program Requirements have not been met or there are significant deficiencies that pose a risk of harm to patients, and the premises must cease providing services.

Inspection Committee

The Inspection Program is overseen by the Inspection Committee, which is a Committee of the Council of the College. The Committee is made up of individuals who are:

- Registrants of the College who have met the standard of practice for IVIT (and therapeutic prescribing);
- Public members of the Council (appointed by the Ontario Government); and
- Public Representatives appointed by the Council.

Inspectors

Inspectors within the Inspection Program are NDs who have met the standard of practice for IVIT and therapeutic prescribing, who have successfully completed an initial inspection under the program and who are specifically trained in the program requirements set out by the Council of the College.

All individuals within a premises are required to cooperate with an inspector who has been appointed by the College to inspect the premises where IVIT services are provided.

Fees

Registration Fee – For premises that are being registered for the first time, a premises registration fee of $100 will be applied. This fee will be deducted from the $2,500 new premises inspection cost.

New Premises Inspection – For premises that are newly registered, the fee for the two-part inspection is $2,500, payable within 30 days of when the DR is notified of the Part I inspection.

Five-year Scheduled Inspection – Premises that have had the Part I and Part II new premises inspections or an existing premises inspection, and undergo their five year inspection or an inspection that is ordered by the Inspection Committee, the cost of the inspection is $2,000 and payable within 30 days of when the DR is notified of the inspection.

The designated Registrant is responsible for ensuring the fees are paid.

All fees stated exclude HST. HST is applied at the time the premises is invoiced.

Reporting Occurrences

An occurrence is a defined event that may result from the provision of IVIT to a patient. An occurrence can be mild (e.g. a rash at the injection site), or severe (e.g. requiring intervention by emergency services). All occurrences are reported to the College as follows.

Type 1 occurrences must be reported to the College within 24 hours of the Registrant becoming aware of the occurrence. These occurrences include:

- The death of a patient following IVIT,
- The death of a patient within five days following IVIT,
- Referral of a patient to emergency services within five days,
- A procedure performed on the wrong patient,

- Administration of an emergency drug to a patient,
- A patient who is diagnosed with shock or convulsions within five days of IVIT,
- A patient who is diagnosed with a disease or any disease-causing agent as a result of the IVIT.

Type 2 occurrences are reported annually in order to provide statistical information to the College. They include:

- An infection in a patient after provision of IVIT,
- An unscheduled treatment of a patient within five days of IVIT,
- Any adverse drug reaction.

More Information

Additional information about the Inspection Program is available on the College's website. An Inspection Handbook is also available and provides detailed information about the processes described in this Fact Sheet.

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