Operational Plan

APRIL 1, 2022 TO MARCH 31, 2025

Activity	Key Performance Indicators
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THE OPERATIONAL PLAN FOR 2022-2025

The coming three years of operations will continue to focus on excellence in regulation, ensuring we fulfill our core mandate to protect the public, and oversee the practice of naturopathy. Operations will focus on ensuring we clearly define our goals, and evaluate our progress, and success in achieving them. Very specific initiatives have been identified to meet the challenges identified above.

This Plan is set out in four major sections as follows.

Part 1: Regulate the Profession.

This section of the Operational Plan sets out the mandatory operational activities that are regulatory in nature that must be undertaken by the College in order to fulfill its legal mandate. The activities set out in this section and the key performance indicators align with the Regulatory Operations Report that the Council receives at each regularly scheduled Council meeting.

Part 2: Governance

This section sets out the governance activities in which the College staff engage to support the governance processes of the Council and its Committees. Good governance is essential to the ability of the College to fulfill its role and this section reflects the way in which the two halves of the College, the governing board and the staff work to move the College forward.

Part 3: Corporate Activities

This section sets out the corporate activities in which the College staff must engage to ensure the smooth operations of the College. They are more routine in nature but represent a foundational component that is often not considered when assessing the resources needed to support the College.

Part 4: Program Development

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This section sets out the program and project work being undertaken by the senior management team of the College within their programs. Within this section, the Council will find the priority projects identified by the Chief Executive Officer for the coming year as well as the priority projects identified by the Directors and Managers within the College.

For each area of work, the activities have been set out either as ones that will be undertaken every year of the three-year plan or set out as work that will be developed over the three-year period.

New for this year, the College has provided an estimated cost of each activity. Estimates have been created by combining budgeted committee costs, budgeted program costs and staff salaries. To arrive at staff salaries, each staff person's time has been broken out into the various duties they perform as a percentage of total time and an assignment of salary dollars calculated. Since many staff work on aspects of a single program, the salary dollars are not reflective of one person. By combining all costs into a single estimated cost, further protections against privacy breaches for staff salaries have been achieved.

1. Regulate the Profession	Estimated annual costs: \$2,182,500
In each of the three years of the operating plan, the College will perfo	rm the following operational activities.
1.01. Registration	Estimated annual costs: \$150,000
All 3 Planning Years	
The College will operate a Registration program that enables naturopaths registered with the College to maintain their status with the College as individuals who hold either a General Class certificate of registration or an Inactive Class certificate of registration.	 A registration renewal process will be conducted annually, in accordance with the by-laws that will enable all Registrants to update their information with the College and pay their annual registration fees. Class change applications will be processed by the College with those requiring a review by the RC being presented to the Committee with the information needed for decision and with Decision & Reasons drafted based on Committee discussions, approved by the Committee, and provided to the Registrant. The public registers will be maintained in accordance with the Code, regulations, and by-laws

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The College will operate a program that allows Registrants to obtain Certificates of Authorisations for professional corporations that they wish to establish.	 A process for Registrants to apply for a Certificate of Authorization for a professional corporation will be maintained. Applications will be reviewed, and decisions provided to Registrants. New corporations will be added to the Corporations register of the College. A process for annual renewals of Certificates of Authorization will be maintained ensuring that all professional corporations are properly authorised.
1.02. Entry to Practise	Estimated annual costs: \$140,000
All 3 Planning Years	
The College will operate an Entry-to-Practise program that enables new graduates and naturopaths registered in other jurisdictions to seek registration as a naturopath in the Province of Ontario.	 A process that enables both recent graduates and individuals from other jurisdictions to apply for registration with the College will be maintained. All applications will be screened to ensure that the entry-to-practise requirements set out in the Registration Regulation, College by-laws and Council policies are met. Applicants that meet the requirements will be provided a Certificate of Registration. Applicants that appear not to meet the requirements will be referred to the Registration Committee (RC) for review. Complete files for matters referred to the RC will be presented to the RC at the first available meeting and staff will support the Committee for review and approval of the RC. Decisions & Reasons of the RC will be provided to applicants and Registrants as soon as they are approved by the Committee. Applicants referred to the Registration Committee will be kept informed of the progress of the review, both informally and formally through decisions rendered.

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The College will operate a program that will allow an individual to be assessed to determine whether their education and experience is substantial equivalency under the Prior Learning Assessment and Recognition Program (PLAR) to that of an individual who has graduated from a CNME-accredited program.	 A process for evaluating individuals under the Council's PLAR policy will be maintained and applicants for assessment will be processed in accordance with that policy. Current information about the PLAR process will be made publicly available by the College. PLAR Assessors will be recruited and provided training and related tools related to the assessment process. Successful PLAR applicants will be invited to sit the Clinical (Practical) examinations and the Ontario Jurisprudence examination, and to make an application for registration under the Entry-to-Practise program.
1.03. Examinations	Estimated annual costs: \$450,000
All 3 Planning Years	
The College will operate an Examinations program that enables the College to properly assess the competencies of graduates from CNME-accredited programs and PLAR candidates seeking registration with the College, as well as naturopaths seeking to demonstrate that they have the competencies required of those standards.	 The College will deliver three (3) sittings of the Clinical (Practical) examinations annually. The College will deliver two (2) sittings of the written Clinical Sciences examination annually. The College will deliver two (2) sittings of the written Biomedical examination annually. The College will deliver two (2) sittings of the Intravenous Infusion Therapy (IVIT) examination annually. The College will deliver two (2) sittings of the Prescribing & Therapeutics examination annually.
All College examinations will be maintained through an examination question development and retirement program.	 A minimum of thirty (30) new examination questions will be developed annually in concert with item writers, item reviewers and the Examination Committee (ETP) for each of the BME and CSE 25% of the questions and cases used in the Clinical Practical exam will be reviewed annually.

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1.04. Patient Relations Program	Estimated annual costs: \$25,000
All 3 Planning Years	
The College will operate a Patient Relations Program as set out in the <i>Regulated Health Professions Act, 1991</i> . Applications for funding will be accepted and reviewed under the new rules and patients entitled to funding supported by the College.	 A Patient relations program will be maintained. Current information (handbooks) for Registrants and Patients will be maintained and made publicly available. A process for applying for funding for counselling will be maintained in accordance with the Code. Applications for funding will be presented to the Patient Relations Committee (PRC) at the next available meeting and decisions will be communicated to applicants.
1.05. Quality Assurance Program	Estimated annual costs: \$175,000
All 3 Planning Years	
The College will operate a Quality Assurance (QA) Program as set out in the <i>Regulated Health Professions Act, 1991</i> and the Quality Assurance Regulation made under the <i>Naturopathy Act, 2007</i> .	 Annual registrant self-assessment Review renewals to ensure all Registrants have completed self-assessment, follow up with those who do not. Continuing Education (CE) Reporting, in three groups, one group each year The reporting group will be tracked, and CE reports analyzed. Follow up with those not received. Those not meeting requirements are presented to the Quality Assurance Committee (QAC) for review and further follow up. Peer & Practise Assessment program QAC determines number of assessments to be completed. Registrants are randomly selected and undergo assessment by a peer. Follow up with those who do not complete it or where issues are raised.

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1.06. Inspection Program	 CE course approval program Applications for CE credits are presented to the QAC for review and approval. List of approved courses is maintained on website. Estimated annual costs: \$150,000
All 3 Planning Years The College will operate an Inspection Program as set out in Part IV of the General Regulation made under the <i>Naturopathy Act, 2007</i> to regulate premises in which IVIT procedures are performed.	 The College will maintain a process for new IVIT premises to become registered with the College and for registering of the designated registrant and other personnel operating from the premises and for existing premises to maintain their information with the College. The College will maintain a process for the inspection of new premises as well as a process for the subsequent re-inspection of premises every five years. Fees for new premises registered and inspections will be levied and collected. A pool of qualified and trained inspectors will be maintained. Incidences of IVIT procedures being provided in unregistered premises will be reviewed and, where appropriate, a request made to the Inquiries, Complaints and Reports Committee (ICRC) to appoint an investigator and a cease & desist letter is sent to the Registrant. Inspection reports will be presented to the Inspection Committee, along with other relevant matters and staff will support the Committee by preparing materials for review, drafting decisions & Inspection Reports on files for review and approval of the Committee. Decisions of the Inspection Committee will be provided to designated Registrant as soon as they are approved by the Committee.

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1.07. Complaints and Reports	 The IVIT Premises Registry will be maintained on the College website with new and amending information added on a routine and regular basis. Type 1 occurrence reports are reviewed by staff on receipt and reviewed by the Committee at the next meeting. If the Committee requires further action by the reporting Registrant, they will be contacted by staff. Type 2 occurrence report forms will be collected annually, analyzed and reported to the Committee and Council. Estimated annual costs: \$495,000
All 3 Planning Years	
The College will operate a Complaints and Reports program to receive information and complaints about Registrants of the profession and to fulfil its obligations to investigate the matters in accordance with the <i>Regulated Health Professions Act, 1991</i> through the Inquiries, Complaints and Reports Committee (ICRC).	 Complaints received by the College will be processed in accordance with the Code. As such, Where approved by the ICRC, or warranted under the RHPA, investigators will be appointed and clarifying documents provided, along with any necessary support. Matters will be processed in a manner that ensures fairness and due process for all parties involved, including opportunities for responding and commenting on submissions provided to the process Complaints will be resolved within 150 days and if not resolved, parties involved and HPARB will be notified. Concerns relating to professional misconduct or incompetence brought to the College's attention will be referred to the CEO for consideration of initiating a request for investigation. Complaint and report files will be presented for the consideration and screening by the ICRC. As such, Panel appointments are drafted for Chair's approval upon receipt of a new matter. Database of appointments is

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	 maintained. Conflicts are tracked and recorded in meeting minutes. Training is conducted for any new ICRC members appointed. Database of Decisions and Reasons issued by the ICRC (to support decision writing process) and Registrants' prior history with the College/BDDT-N is maintained. Materials for matters being brought before the ICRC will be presented to the Committee. Decision and Reasons are drafted by ICRC staff, reviewed by legal counsel, reviewed and approved by the Panel. Complaints and Reports outcomes are monitored on an ongoing basis. Any deviation from ICRC decision is reported to the Deputy CEO. The status and summary of active and closed complaint and reports are regularly updated and maintained on the College's website. Program information will be maintained on the College's website.
1.08 Cease & Desist	Estimated annual costs: Incorporated with complaints and reports.
All 3 Planning Years	
The College will operate an Unauthorized Practitioners program that will issue Cease and Desist (C&D) letters to individuals not registered with the College who are holding themselves out as naturopathic doctors or providing naturopathic treatments and to Registrants who are breaching the standards of practice in a manner that presents a risk of public harm.	 C&D letters are drafted and sent to the individual via Process Server, where applicable. Names of unauthorized practitioners are posted on the Register of Unauthorized Practitioners on the College's website. Staff follows up on the performance of signed confirmations and updates the Register of Unauthorized Practitioners. Information regarding practitioners who have violated the confirmation is provided to the Deputy CEO. Information about unauthorized practitioners who failed to sign a confirmation is provided to the Deputy CEO.

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1.09 Alternate Dispute Resolution Program	 Matters are presented to the CEO for a decision on whether the College will seek an injunction from the Ontario Superior Court of Justice. Estimated annual costs: \$5,000
All 3 Planning Years	
The College will operate an Alternate Dispute Resolution Program to ensure that matters that meet the eligibility criteria and are agreed to by both the Complainant and Registrant are properly resolved in accordance with section 25 of the RHPA and the program policies	 Complaints received by the College will be reviewed by College staff for ADR eligibility. As such, Where eligible the complainant will be provided information about ADR and an opportunity to decide whether they wish to proceed with ADR. Where eligible and the complainant agrees, the Registrant will be provided information about ADR and an opportunity to decide whether they wisht to proceed with ADR. Where eligible and beth parties agree, the matter is provided to the CEO to confirm eligibility and if approved, to refer the matter to ADR. An independent College approved Mediator is appointed for each ADR matter. A matter referred to ADR by the CEO must be completed and submitted for ratification within a maximum of 120 days of the referral.
1.10. Hearings	Estimated annual costs: \$500,000
All 3 Planning Years	
The College will operate a Hearings Program to ensure that matters that are referred by the Inquiries, Complaints and Reports Committee are properly adjudicated.	 Each matter referred by the ICRC will be assessed, and a determination made on the appropriateness of and opportunity for settlement. Information for disclosure is provided to the CEO/legal counsel.

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	 Matters that may be settled will proceed with a Pre-hearing conference as required, a draft Agreed Statement of Fact and Joint Submission on penalty that is consistent with the outcomes of similar disciplinary matters of the College and other Colleges. Where no settlement is possible or appropriate, a full contested hearing will be delivered with the CEO representing the College, with support of legal counsel, as prosecution. The College will facilitate the Chair's selection of panels for hearings, coordinating hearings, counsel, Independent Legal Counsel (ILC) and witnesses and providing technological support for hearing of the Discipline Committee (DC) and Fitness to Practise Committee (FTP). Discipline hearings are scheduled and held as required. Information about current referrals to DC, hearings scheduled and completed, and DC decisions are published on the website and updated regularly. The Registrant is notified of the ICRC decision and provided with a copy of allegations referred to DC. Orders of panels will be monitored on an on-going basis to ensure the Registrant is in compliance. Any deviation from the order is reported to the CEO. Terms, conditions and limitations imposed by the Panel and summaries of Undertakings are published in the Register.
As a corollary, the College will support the Discipline and Fitness to Practise Committees as quasi-judicial and independent adjudicative bodies.	 ILC will be retained by the College to provide on-going legal support to the Committee and the Chair. If requested by the Chair, a Request for Proposals will be developed and issued by the College with evaluations to be completed by the Committee. Full committee meetings will be facilitated by the staff as directed by the Chair, including making necessary arrangements with ILC for training.

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1.11. Regulatory Guidance	Estimated annual costs: \$40,000	
All 3 Planning Years		
The College will operate a Regulatory Guidance program that will respond to Registrants' questions and provide information, whenever possible, and guide the profession to the resources available to it. 1.12. HPARB Appeals	 E-mail and telephone inquiries will be responded to by the Regulatory Education Specialist. Statistics based on the number and nature (topic) of inquiries will be maintained and presented to the Council. Estimated annual costs: \$5,000 	
All 3 Planning Years		
The College will operate a program in support of the Health Professions Review and Appeal Board (HPARB) appeals process for appeals of decisions of the RC and for appeals of decisions of the Inquiries, Complaints and Reports Committee.	 College staff will provide documentation relating to appeals to HPARB as soon as possible after receiving alert of an appeal. Legal Counsel for the College will be alerted and provided copies of all materials provided to HPARB. Staff will attend conferences and hearings in defence of RC decisions rendered and as a resource to HPARB in matters of appeals of ICRC decisions. HPARB decisions will be reported to the Committees and the Council and any matters returned by HPARB will be brought to the appropriate committee on an expedited basis. 	
1.13. HRTO Matters	Estimated annual costs: \$2,500	
All 3 Planning Years		
The College will operate a program that allows it to respond to matters filed with the Human Rights Tribunal of Ontario (HRTO).	 All notices received by the HRTO will be provided to Legal Counsel of the College. College staff will support Legal Counsel by providing all necessary information to allow for a proper defence to be mounted. College senior staff will participate in all conferences and hearings of the HRTO. All outcomes of the HRTO will be reported to the Council and any impacted Committees. 	

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1.14 Standards	Estimated annual costs: \$25,000	
All 3 Planning Years		
The College will operate a program to develop and maintain the Standards of Practise of the profession and any related policies and guideline. Standards and guidelines will be reviewed by the Standards Committee (SC) to ensure that the standards fully support patient- centred care. New standards will be developed as identified by the Committee and/or Council.	 College staff will support the SC as it initiates reviews of any or all of the Core Competencies, Code of Ethics and Standards and Guidelines. Staff will support the SC as it undertakes consultation of stakeholders relating to existing or new standards, guidelines or policies. As such, staff will Prepare consultation materials and release them publicly. Receive and respond to any inquiries about the consultations. Assemble and summarize consultation submissions for the Committee and present these to the Committee for review. Where the SC makes amendments to any of the standards, guidelines or policies, staff will update the materials and release them publicly. Staff will also maintain a program of alerting Registrants of any changes to the standards. 	
1.15 Scheduled Substance Review Program	Estimated annual costs: \$5,000	
All 3 Planning Years		
The College will operate a program for review of drugs, substances and laboratory testing authorized to the profession through the General Regulation and Regulations made under the Laboratory and Specimen Collection Centre Licensing Act (LSCCLA).	 The College will support the Scheduled Substances Review Committee (SSRC) as it regularly reviews the drugs and substances authorized to the profession in the General Regulation and the list of laboratory tests authorized to the profession in the LSCCLA to ensure appropriateness and to identify any gaps. Meetings of the SSRC will be held at the call of the Committee Chair and information related to matters to be presented to the Committee will be prepared and assembled by staff. 	

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		 Staff will support the SSCR as it undertakes a review of the Scope of Practice of the profession and any consultation of stakeholders relating to existing or new substances, drugs or lab tests. As such, staff will Prepare consultation materials and release them publicly. Receive and respond to any inquiries about the consultations. Assemble and summarize consultation submissions for the SSRC and present these to the Committee for review. Where the SSRC makes recommendations for amendments to Council, staff will support the Council evaluation process and, if approved, prepare any Regulation amendments for approval of Council and submission to the Ministry of Health.
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2. Governance & Accountability of the College	Estimated annual costs: \$200,000			
The College will ensure that it is properly governed by a Council and an Executive Committee as required under the Regulated Health				
Professions Act, 1991 and that these governing bodies fulfill their roles and responsibilities under the Act and are properly constituted as set				
out in the Naturopathy Act, 2007 and the College by-laws. The College will also ensure that it remains accountable to the Minister of Health				
on behalf of the people of Ontario, as well as any other oversight bodies established by the Government of Ontario. As such, the following				
operational activities will be undertaken.				

2.01. Proper Constitution & Composition	Estimated annual costs: Not broken out
All 3 Planning Years	
The College will operate a program to ensure that the College Council, and its committees are always properly constituted and therefore able to fulfill their governance obligations.	Council elections will be delivered annually in accordance with the by-laws. As such,

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	 Calls for Nominations will be issued, and an election
	handbook will be provided to guide interested Registrants
	through the election process.
	 Nominations and candidacy materials will be provided to
	the Governance Committee for review in accordance with
	the Qualifying Program approved by the Council.
	 Where nominations are received, elections will be
	completed by the first week of April and where none are
	received, in accordance with the Supplemental Election
	process set out in the by-laws.
	• Executive Committee elections will be delivered annually, and
	supplemental elections held as needed, in accordance with the
	by-laws and Council policies. As such,
	 Election information will be provided to all existing and
	incoming Council members about the Executive
	Committee positions and elections.
	 Elections will be held annually at the May meeting and
	supplemental elections when determined by the Council.
	 Public member appointments will be monitored to ensure
	applications for renewals are submitted in a timely manner and
	that the Public Appointments Secretariat is aware of vacancies
The College will maintain a program to ansure that Committees are	and the need to appointment and re-appointment as necessary.
The College will maintain a program to ensure that Committees are	The CEO will monitor all committees to ensure that they are properly constituted as set out in the College by laws
properly constituted, volunteers are recruited, and appointments are sought from the Council.	properly constituted as set out in the College by-laws.
	Recruitment of volunteers from among Registrants and the public will be undertaken on an on going basis
	will be undertaken on an on-going basis.
	 Council will be presented a slate of appointments, at minimum appually at its April meeting and on going appointments will be
	annually at its April meeting and on-going appointments will be

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presented to the Council or the Executive Committee on an as-
needed basis.

2.02. Competency-based Appointments	Estimated annual costs: Not broken out
All 3 Planning Years	
The College will fully implement and manage the Council's Qualifying Program for all volunteers, including those seeking election to Council and appointment to a Council Committee.	 A minimum of two orientation sessions will be delivered for potential candidates for election and individuals seeking appointment to Committees to provide an overview of their duties and responsibilities and overall time commitment. Each volunteer will be required to complete a competency-based self-assessment based on the competencies established by the Council in its Governance Process policies. Each volunteer will be screened by the Governance Committee to confirm their competency and overall fit with the College's volunteer program. The Governance Committee will determine eligibility for election to the Council and make recommendations to the Council for volunteer appointments to committees.

2.03. Volunteer Training Program	Estimated annual costs: Not broken out
All 3 Planning Years	
The College will operate a program to ensure that all new and existing Council and Committee members are afforded the necessary training and fulfill their duties.	 A minimum of one live training session will be offered annually for new Council and committee members that sets out their duties and responsibilities surrounding due diligence, public protection and other key matters. All new volunteers will be required to complete training on bias, diversity, human rights, accessibility and anti-discrimination.

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• All sitting Council and Committee members will be required to complete an on-line version of the training as a refresher every
two years.

2.04. Effective Assessment Processes	Estimated annual costs: Not broken out	
All 3 Planning Years		
The College will operate a reporting program to ensure that the Council is able to fulfill its oversight duties as set out in the Code, the Act and the College by-laws.	 The CEO will submit bi-monthly Regulatory Operations Reports to the Council detailing regulatory operational activities in line with part I of this Operational Plan. These reports will be made public. The CEO will submit a semi-annual report on progress towards meeting the goals set out in this Operational Plan. As such, A mid-year report based on the work set out in the Operational (excluding Part 1) will be presented to the Council at its November meeting. A year-end report based on the work set out in the Operational Plan including Part 1) will be presented to the Council at its July meeting. 	
The College will operate a program to ensure that the Council can properly assess the performance of the CEO.	 Council will undertake a performance review of the CEO on an annual basis in accordance with its policies. A such, The Council will be provided necessary materials to undertake the review, which is based on the goals and development plan set by the CEO and approved by the Council, as part of the July Council meeting. 	
The College will operate a program to ensure that the Council can properly assess, its own performance, the performance of its committees and individuals Council and Committee members.	• The Council will undertake a performance review of itself, the Committees and individual Council and Committee members through an independent and neutral third party. The review will be initiated not later than April and completed by the end of July.	

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The College will operate a program that identifies and mitigates risks	• The CEO, on behalf of the Council, will maintain appropriate
to the Council and the College.	insurance policies to cover risks to the organization, including
	directors and officer's liability insurance, commercial general
	liability insurance and property insurance. These policies will be
	reviewed bi-annually.
	• The College will update the organization-wide risk assessment,
	including but not limited to:
	 Identifying potential bias in assessment methods or
	procedures,
	 Evaluating and prioritizing areas identified as high risk,
	 Developing and recording mitigating strategies to address
	potential risks in guidelines for assessors and decision-
	makers, and
	• Establishing a means to ensure corrective actions are
	implemented in a timely manner,
	 Monitoring of mitigated risks.

2.05. Effective Quality Decision-making	Estimated annual costs: Not broken out
All 3 Planning Years	
The College will operate a program that ensures that the Council is properly equipped to make decisions on policy matters brought before it.	 Council will be fully briefed on all major issues and policy matters to be brought before it and Council will receive its materials for meetings in a timely manner. Briefing notes on major issues and policies will be developed as needed and presented to Council to facilitate the deliberative process. Briefings of Council will include a detailed analysis of the risk, privacy, financial, transparency and public interest considerations of the decisions being considered.

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2.06. Transparency	
All 3 Planning Years	
The College will operate a program that supports the transparency principles adopted by the Council and increases transparency of College decision-making wherever possible.	 A qualitative Annual Report that provides not only statistical information but also necessary context and trending information, will be developed and released annually. Audited financial statements and the Auditor's report will be presented to the Council at its July meeting and included in the Annual Report. Regular Committee reports will be sought from Committee Chairs and included in the Council consent agenda for each Council meeting and Annual Committee reports will be developed by the staff and reviewed by Committee Chairs and presented to the Council in July. Council and Executive Committee meeting materials will be made publicly available unless redacted in accordance with the Code. As such, Council meeting materials will be posted to the website prior to the Council meeting. Executive Committee materials will be posted to the website in advance of the meeting in accordance with the Committee terms of reference.
 Regulatory processes and matters of the public interest will be routinely disclosed. 	 The College will maintain (update regularly) a summary table of active and resolved complaints and inquiries on the website. The College will alert the public to pending discipline hearings including the status of the matter and the notices of hearings. Discipline hearing outcomes will be provided to the public, including posting on the website of Agreed Statements of Facts and Joint Submissions on Penalty and Costs, which are exhibits to

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hearings, and posting of Decisions and Reasons from panels of the
Discipline Committee.

2.07. Accountability	Estimated annual costs: Not broken out
All 3 Planning Years	
The College will provide Health Force Ontario (HFO) the annual reporting data as required under the Code.	 Applications for registration and registration renewal forms will be refined to support the collection and annual reporting of HFO data. The annual Health Force Ontario submission will be made by May 30 and any corrections submitted by September 30.
The College will support the work of the Office of the Fairness Commissioner (OFC) in its effort to ensure that registration practices of regulatory authorities are fair, objective, impartial and transparent.	 The College will submit the annual Fair Registration Practices report on the schedule set by the OFC and will make such reports publicly available. The College will engage the OFC in support of its registration practices assessment conducted approximately every three years.
The College will support the work of the Ministry of Health in its oversight capacity through the College Performance Measure Framework .	 The College will assemble the necessary quantitate and qualitative data for the CPMF between January and March annually. The College's draft submission will be presented to the Council in March annually. Once approved, the report will be submitted to the Ministry. The Ministry's summary of all College reports will be reviewed to identify best practices which this College may adopt in the future.

2.08. Strategic Planning	Estimated annual costs: \$30,000
	2022-2023

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Using a qualified and skilled external consultant, the Council will undertake a planning process to define a clear Strategic Plan to communicate your priorities to stakeholders, respond to the College's Performance Measurement Framework and support decision-making in the years ahead.	 An environmental scan will be undertaken to ensure there is a clear understanding of the existing context in which the College operates. Meetings with stakeholders will be held to ensure our understanding of key issues and to challenge, validate or refine early themes emerging from the environmental scan. Registrants will be consulted through an on-line survey to ensure a broad understanding of their perspectives and priorities. A series of half-day workshops will be held by the Council to explore developed themes, opportunities for change and options. A formal strategic plan as well as revised Ends Statements and Ends Priorities will be drafted and validated with the Council.
	2023-2024
	No developmental activities required.
	2024-2025
	No developmental activities required.

3. Corporate Activities	Estimated annual costs: \$510,000
3.1. Human Resources	Estimated annual costs: \$55,000
The College recognizes that its human resources are a key asset. It also it also relies on volunteers to fill important roles on Statutory, Council programs.	o recognizes that while a major part of its work is conducted by its staff, and Operational Committees, as well as, in the delivery of operational
All 3 Planning Years	
The College will manage its human resources in such a way at to recognize the value of its staff and in keeping with best practices for human resource management in the not-for-profit sector.	• The College will undertake recruitment of new personnel in a way that first emphasises current staff and is open and transparent. As such,

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 Existing staff will be considered first for open positions as
opportunities for advancement or development prior to
advertising positions.
 Position descriptions will be maintained, and updates
reviewed by the Management team prior to initiating recruitment processes.
 New positions and vacant positions will be advertised on
the College's own website, as well as in one or more
forums for job postings.
College staff will be compensated in a manner that reflects the
current market value of the positions. As such,
 A salary range for each position shall be maintained and
updated annually using the Consumer Price Index for
November Ontario All-Items published in December.
 Compensation for new hires will be based on the salary ranges.
• New staff will be provided with the information and tools
necessary to the performance of their duties with the College. As
such,
\circ A policy governing the on-boarding of new staff will be
maintained and implemented.
• New staff will be oriented to the College, its role and how
it meets it obligations.
 Initial training of new staff shall be provided by the
College to enable quick integration into the work force.
 An evaluation of performance will be conducted at the
conclusion of the 3-month probationary period.

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	 Staff performance will be evaluated in an open and transparent way based on standardized performance management processes. As such, Performance reviews will be conducted on all staff annually and will be completed by the end of July. A program for appropriate compensation changes will be maintained that is based on pay-for-performance using salary increases or bonuses. Staff who are leaving the College will be treated with respect they and dignity. As such, Staff who are being removed from their position shall only be removed after all opportunities to explore systemic or environmental factors have been completed. Staff who resign their position will be asked to complete an exit interview that provides feedback to the College.
College management and staff will work collectively to continue to	• The College shall take all necessary and prudent steps to ensure
build and enhance the College "team" as a unified work force and to ensure that the College's workplace environment is conducive to the	that the College workplace environment promotes diversity and inclusivity, and is free from harassment, abuse and discrimination,
team approach.	including annual reviews of the College's relevant policies and ensuring that proper investigations are conducted when concerns are raised.
	The College shall foster a team approach through shared work
	and social experiences. As such,
	 On at least a semi-annual basis, the College will provide formal social opportunities for the staff.
	 Informal social opportunities to develop the staff rapport and team will also be provided.

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	 On a quarterly basis, the CEO shall convene a staff meeting for the purposes of information sharing among staff regarding their work priorities and workflow as well as the opportunity to provide staff with information about corporate issues and provide information and support to enhance overall and individual performance.
The College will provide staff within on-going training to enhance individual and program performance.	 The CEO will provide all staff with group training in areas of importance to the College and its regulatory work. A formal process to support and encourage staff professional development will be established and integrated to annual performance review process, to enhance their own performance, that of the program areas and as developmental opportunities. The College shall maintain membership in both the Council on Licensure, Enforcement and Regulation (CLEAR) and Canadian Network of Agencies for Regulation (CNAR) and share information from these organizations with staff. Within the budgetary restrictions, the College will send staff to the CLEAR Annual Education Conference and to the CNAR Annual Education Conference. Processes will be implemented to assist staff in self identifying training needs related to their program area(s) and opportunities for future advancement.

3.2. Financial Management	Estimated annual costs: \$110,000
All 3 Planning Years	

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Activity	Key Performance Indicators
The financial resources of the College will be managed in accordance	Capital and Operating budgets will be developed for presentation
with generally accepted accounting principles and best practices for	to and acceptance by the Council, that will include a one-year
the not-for-profit sector and will meet all legislative and oversight requirements.	budget and two years of estimates, based on a three-year operating plan.
	 Unaudited financial statements and the variance report will be
CEO, through the Director of Operations, will develop a budget	provided to Council as part of the next Council meeting as soon as
	they are finalized and in accordance with the Councils Annual
	Planning Cycle (GP08).
	• The annual external audit of the College's financial status will be
	supported by the staff. As such,
	 Staff will provide all necessary information and support
	requested by the auditor.
	 The Audit Committee will meet at least twice to review
	the Auditor's findings.
	 The Auditor's report and audited financial statements will be presented to the Council in July and released publicly
	once approved.
	 Any concerns identified by the Auditor with respect to
	financial management practices will be addressed by the
	CEO within thirty (30) days of the report being accepted
	by the Council.

3.3. French Language Services	Estimated annual costs: Not broken out
All 3 Planning Years	
The College will continue to support and expand French language services through maintaining sufficient bilingual staff and translating materials for College programs into French.	 The College will continue to ensure that bilingual staff are available to provide service to the public and Registrants. The Annual Report, Discipline Decisions & Reasons, Standards and Practise Guidelines will be made available in French.

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	 The College's website will be fully translated and available in French. Discipline, complaints, patient relations, PLAR, examinations and applications for entry-to-practise will be translated into French.
The College will ensure that its regulatory processes, including but	• The College will work with the Ministry of Health and the Public
not limited to complaints/reports, discipline and fitness-to-practise	Appointments Secretariat to seek public appointments who are
are equipped to conduct hearings in French.	fully bilingual for appointment to the Discipline and Fitness to
	Practise Committees.

3.4. Regulations, Policies & Procedures	Estimated annual costs: Not broken out
The College has developed and implemented many program and oper reviewed to ensure that they reflect current practices and the most en All 3 Planning Years	
A review cycle will be undertaken of existing Regulations, program policies, operating policies and related procedures to ensure that they reflect good practices and are consistent with the objects of the College and procedural fairness, and that they are fair, objective, impartial and transparent and free of bias.	 Working with Committee Chairs, the College will ensure that all regulations and program policies are accurate and appropriate for the College's work. As such, Regulations will be reviewed with the Committees on a biannual basis and any recommendations for amendments brought before the Council. Program Policies that are approved by the Council will be reviewed on an on-going basis with approximately 5% being completed each year. All Operating policies and procedures will be accurate to the manner in which the College functions and will be appropriate for the role of the College. As such, 20% of all existing policies and procedures will be reviewed on an annual basis.

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3.5. Records Management and Retention	 All policies will be posted for the use of College staff in the performance of their duties. New policies and procedures will be developed as needed. Estimated annual costs: Not broken out
All 3 Planning Years The College will conduct on-going and regular audit of its records management and retention practices to ensure that practices are in keeping with the Records Management and Retention policies.	 Re-training will be provided to staff surrounding the nature of which records are retained and those that are disposed of (transitory records). The Records Management and Retention Policies will be reviewed with each department to ensure that they file and retain records according to the policy and correct any records filing deficiencies.

3.6. Corporate Communications	Estimated annual costs: \$345,000	
All 3 Planning Years		
The College will maintain a program of outbound communications and messaging to the Registrants, public and stakeholders through defined program elements.	 Registrants and stakeholders of the College will be informed of the College's on-going work and new developments. As such, Ten editions of iNformeD will be produced and delivered electronically. The Blog and News sections of the College's website will be updated regularly. The College's overall website will be accurate, up-to-date and a valued tool for users. The College's social media channels will be updated regularly. 	

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	 The College will offer a minimum of two installments of its "In Conversation with" series for registrants, the public and stakeholders
The College will operate a program of engagement that provides opportunities for Registrants, the public and stakeholders to communicate back to the College.	 and stakeholders. The College will engage the Ontario Government in on-going dialogue. As such, The CEO will liaise with the Ministry of Health on an on-going basis and respond to inquiries on a timely basis. The Council Chair and CEO will meet with Assistant Deputy Minister for regulatory matters in the Ontario Ministry of Health on an as-needed basis. The College will engage naturopathic stakeholders in on-going dialogue. As such, The College Council Chair and CEO will meet with the President and the CEO of the OAND, the President and the CEO of the OAND, the President and the Board Chair of CCNM on a regular schedule. The College will engage in on-going dialogue with other regulatory authorities within the profession, within health professions and the broader regulatory community. As such, The CEO will participate as a Director on the Board of Directors of Health Profession Regulators Ontario, subject to any limitations placed upon that role by Council. The CEO or their delegate(s) will participate in working groups and Committees of HPRO as necessary, as well as in the Ontario Regulators for Access Consortium (ORAC). The College will continue to support the other Canadian naturopathic regulators by maintaining individual relationships at the senior level as well as by participating

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in the Canadian Alliance of Naturopathic Regulatory Authorities (CANRA).	
 Authorities (CANRA). The College will engage Ontarians on regulatory matters. As such The College will engage Ontarians on regulatory matters. As such The College will participate in the Citizens Advisory Groud (CAG) as a mechanism for public engagement on key consultations undertaken by the College. The College will continue to invite citizens to participate the College through its social media channels, newslette and CEO blog as well as supporting the College as Public Representatives. The College will engage naturopathic educational students on regulatory and profession-specific matters. As such, The Director of Registration and Examinations will meet with CCNM students about the registration process and 	
student body though a variety of means.	

4. Program Development	Estimated annual costs: \$262,500
4.01. COVID-19 Support	Estimated annual costs: \$7,500
All 3 Planning Years	

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In 2020 the novel coronavirus impacted Canada and Ontario unlike any pandemic in the past. The health care system was essentially shut down requiring the College to provide regular information, guidance and support to Registrants. In addition, the ongoing enforcement of the rules for those attempting to circumvent government and College Directives. A program of providing on-going support and guidance will be maintained by the College as long as the pandemic is active in this Province.	 important and relevant. In concert with the Standards Committee, current Standards and Guidelines will be updated as necessary in response to pandemic. Reopening guidelines will be issued to the profession and updated as needed to guide and assist them.

4.02. Risk-based Regulation	Estimated annual costs: \$25,000	
The Council's Governance Report approved in July 2020 included the mandate that the College moved towards a risk-based regulation approach. The work started on this program in 2020-2021 will be continued and the program that is developed will be presented to the Council for approval and, if approved, implemented.	 2022-2023 The development of the Risk-based Regulation approach initiated in the prior fiscal year will continue with the development of a program overview that provides all relevant details. The College will engage stakeholders to consider the proposed model and determine the most effective means of assessing data that is collected to identify risks and potential mitigation activities. Preliminary policies that articulate the approach to be used will be developed. 2023-2024 Program policies and related procedures will be finalized and presented to the Council for approval. A process of risk identification and mitigation will be initiated and presented to Council. 	
	The risk identification process will be implemented.	

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 Risk mitigation process will be implemented. The tool will be finalized and implemented.
 The process will be monitored and reported on to the Council. A review of the effectiveness of risk identification and mitigation process will be undertaken. The program will be evaluated and adjusted to improve effectiveness as warranted.

4.03. Volunteer Program Development and Implementation	Estimated annual costs: \$25,000
traditional use of that term in the context of staff. The College's hu who work with the College on Council and Operating Committees a	burces are a key asset. The College's human resources go well beyond the man resources, and therefore key assets, includes the many volunteers and who perform key roles within the regulatory framework. As such, the program that covers recruitment, competency assessment, training and
The College will develop a comprehensive approach to the	2022-2023
recruitment and retention of volunteers.	 A new approach to the on-going recruitment of volunteers from both the profession and the public will be developed in concert with the Governance Committee of the Council. A retention program that will be developed that incorporates best practices in retention including regular feedback opportunities from current volunteers and those that may exit the program. In concert with the Governance Committee, a mentoring program will be developed and implemented as a means of providing support to volunteers and adding value for both new and existing volunteers.

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means of augn	program for volunteers will be developed as a menting the retention of volunteers and recognizing t the Council and College places on its human	
2023-2024		
 Evaluation of p 	program and updating as needed.	
2024-2025		
 No additional of 	development activities required.	

4.04. Fair Registration Practices & Currency Requirements	Estimated annual costs: \$25,000	
The College is committed to registration practices that are	2022-2023	
The College is committed to registration practices that are transparent, objective impartial and fair, further incorporating recommendations made by the OFC in it's report of 2018, and best practices as highlighted by the Ontario Ministry of Health's CPMF Reporting.	 A review of registration requirements will be undertaken: In concert with the Registration Committee, entry to practice and registration requirements will be reviewed for relevancy and currency. Tools to assess currency of knowledge, skill and judgment at entry to practise will be amended to reflect updates to core competencies and/or the competency profile of the profession. Audits of Registrant practise hours in the new database management system will be undertaken in conjunction with the overall audit of the College's filing system. 	
	2023-2024	
	 The College will seek to implement any additional recommendations resulting from further OFC assessment, changes to OFC fair registration practice or fair access 	

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requirements, or Ministry feedback in relation to the CPMF
reporting

4.05. PLAR Program – Demonstration-based Assessment	Estimated annual costs: \$25,000
As a result of COVID-19, beta testing and operationalization of cases	2023-2024
associated with the final demonstration-based, OSCE-type component ("Interaction with a Simulated Patient") of the PLAR program had to be delayed.	 The "Interaction with a Simulated Patient" (ISP) component of the PLAR program will be operationalized: Three cases will be beta tested and finalized for use as part of the PLAR process. Associated staff and recruited demonstration-based assessors
	 Associated start and recruited demonstration-based assessors will be trained on the administration of the ISP.

4.06. Review of College Finances and Fees	Estimated annual costs: DEFERRED	
In 2018, the Executive Committee committed the College to	2022-2023	
undertake a review of the College's financial status and registration	No additional development activities required.	
fees levied to the profession to ensure that the fees were at the	2023-2024	
C C	 A Request for Proposals process will be initiated in support of this project. As such, A selection team of staff and Council members will be established, A request for proposals will be issued, Responses to the RFP will be evaluated by the selection team and interviews held with potential vendors, A contract will be awarded. The Auditor selected will be engaged to complete the necessary work. Using the first five full years of operations, an independent 	

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 audit will be undertaken of the College's financial standing, financial risks, recommended levels of reserves and actual reserves, and revenues, in particular, Registrant fees to determine the appropriate and necessary fee levels. As such, Final by-law changes to the fee schedule will be presented to Council for approval.
• The fees for the Registration year 2024-2025 (which begin to be collected in February 2024, may be adjusted based on the by-law changes.

4.07 Property Search	Estimated annual costs: \$20,000
The College will engage in an open and transparent process to seek	2022-2023
appropriate space for the head office of the College that meets the current and future needs of the College.	 Using the needs assessment developed in the prior year, the College will work with its broker of record to issue a request for proposals from various office buildings to allow for an open bidding process from buildings that can meet or exceed College needs. The College will negotiate a lease agreement with the building management of the selected location, including any leasehold changes needed for the location. The College will issue a request for quotes from companies that are needed to support a move should one be required. As such, requests for quotes or proposals will be issued to, Companies that specialize in office move, if a move is required. Companies that specialize in office design, if a move to a new location is required.

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	 Companies that specialize in office construction, if a move is required and construction is needed. Preparations will be made to any new office space in anticipation of occupancy by the end of February 2023
	2023-2024
	 The College will work to promote any address changes and to settle the College operations and personnel into new space if a move was required.
	2024-2025
	No additional development activities required.

4.08 Enterprise Risk Management	Estimated annual costs: \$30,000
The College will develop and implement an enterprise risk	2022-2023
management (ERM) designed to identify, monitory and mitigate risks faced by the College.	 Working with the Risk Committee and the Governance Policy Review Committee, existing Executive Limitations policies will be reviewed and proposed changed developed to incorporate the new ERM framework. All risks will be assessed and prioritized. Mitigation strategies will be developed. A risk report will be presented to the Council for review and acceptance. The Council will be asked to identify the College's true level of risk tolerance and the nature and timing of risk monitoring reports.
	2023-2024
	No additional development activities required.
	2024-2025
	No additional development activities required.

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4.09 Equity, Diversity, and Inclusion	Estimated annual costs: \$135,000		
The College will develop and implement an equity, diversity and	2022-2023		
inclusion initiative.	 A general statement for the Council on EDI will be developed in concert with the EDI Committee and presented to the Council for consideration. A Governance Process and Executive Limitation policy relating to EDI will be developed in concert with the EDI Committee and the Governance Policy Review Committee for the consideration of the Council. Recruitment of new volunteers and staff will be one that is based on equity, diversity and inclusion. Committee Terms of Reference will include EDI language. Existing job profiles will be updated to include EDI language. Existing Regulations and program policies will be reviewed by the EDI Committee and recommendations offered that ensure they are free of bias, discriminatory and racist elements. 		
	2023-2024		
	 Existing Regulations and program policies will be reviewed by the EDI Committee and recommendations offered that ensure they are free of bias, discriminatory and racist elements. Bi-annual re-education for all volunteers and staff on Unconscious Bias and Diversity and Inclusion training. 		
	2024-2025		
	• Existing Regulations and program policies will be reviewed by the EDI Committee and recommendations offered that ensure they are free of bias, discriminatory and racist elements.		

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4.10 Data Migration	Estimated annual costs: \$20,000		
The College's existing server is reaching end of life. College data will	2022-2023		
be migrated off the server and into the cloud.	 The College will be developing a project plan in collaboration with the I.T company. The College's data will be migrated with identical security features including VPN. The College will make the necessary provisions should it be required to support cloud operations in new office space, including installation of equipment. Transitioning the server to the cloud will reduce the College's need for larger space to support existing server and will decrease carbon footprint. Pre-migration testing will be conducted to minimize operational disruptions. At the end of 2022 College data will be fully migrated to the cloud. All of the College's data will be stored in Canada, including current 		
	Alinity (cloud application). 2023-2024		
	No additional development activities required.		
	2024-2025		
	No additional development activities required.		

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