

2021/22 Annual Report

Protecting
the public
Supporting
safe practice



The College of Naturopaths of Ontario

Table of contents

ABOUT US	3
GOVERNANCE	4
STAFF OF THE COLLEGE	5
LETTER FROM THE CEO	6
REGISTRATION AND EXAMINATIONS	7
SETTING STANDARDS	16
QUALITY ASSURANCE	23
PROFESSIONAL CONDUCT	26
DISCIPLINE COMMITTEE	29
HOLDING THE COLLEGE ACCOUNTABLE	32
COMMUNICATIONS	35
SUMMARY FINANCIAL STATEMENTS	37
OUR VOLUNTEERS & COLLEGE COMMITTEES	41



Formal 2021–22 reports from our Statutory Committees are **available on our website** and were approved by our governing Council at its July 2022 meeting.



ABOUT US

PROTECTING THE PUBLIC. SUPPORTING SAFE PRACTICE.

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

4 KEY FUNCTIONS OF REGULATION

We achieve our mandate by performing these four key functions:

1

Registering Safe, Competent, and Ethical Individuals

We establish requirements to enter the profession, set and maintain examinations to test individuals against these requirements, and register qualified individuals – individuals who have demonstrated that they can practise naturopathy safely, competently and ethically.

2

Setting Standards

We set and maintain standards of practice that guide our Registrants to ensure they provide safe, competent and ethical patient care and inform the public about what to expect from their naturopath.

3


Ensuring Continuing Competence

We create and manage a variety of continuing education and professional development programs to ensure naturopaths maintain their competency as a means of assuring the public that they will receive safe, competent and ethical naturopathic care.

4

Providing Accountability through Complaints and Discipline

We hold naturopaths accountable for their conduct and practise 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 Ontarians; we have registered the right people who are qualified and committed to providing safe, competent and ethical care; we have ensured that our Registrants maintain their knowledge, skill and judgement; and we have held those who may have faltered to be accountable for their decisions.

GOVERNANCE

2021–2022 COUNCIL

The College is governed by a board of directors referred to as a Council. The Council includes eight Registrants of the College elected throughout Ontario and seven Public members appointed by the Government of Ontario.

The Council performs three functions:

1. It ensures that the College fulfils its mandate set out in legislation.
2. It sets the strategic directions of the College and monitors the College's performance.
3. It appoints the Chief Executive Officer and monitors their performance against agreed upon priorities.

OFFICERS AND EXECUTIVE COMMITTEE

Dr. Kim Bretz, ND
Council Chair

Sarah Savolaine*
Council Vice-Chair

Dean Catherwood*
Officer-at-Large

Dr. Jordan Sokoloski, ND
Officer-at-Large

Dr. George Tardik, ND
Officer-at-Large

COUNCIL MEMBERS

Asifa Baig*

Dr. Jonathan Beatty, ND

Dr. Shelley Burns, ND

Brook Dyson*

Lisa Fenton*

Dr. Brenda Lessard-Rhead, ND (Inactive)

Tiffany Lloyd*
(appointed March 4, 2022)

Dr. Jennifer Lococo, ND
(May to November 2021)

Paul Philion*
(appointed July 8, 2021)

Dr. Jacob Scheer, ND

* Denotes individuals appointed to the Council by the Lieutenant Governor in Council.

STAFF OF THE COLLEGE¹

The day-to-day operations of the College are overseen by a group of dedicated and talented individuals.

Andrew Parr, CAE
Chief Executive Officer

Jeremy Quesnelle
Deputy CEO

OPERATIONS

Agnes Kupny
Director

Thussyanthi Pirabakaran
Finance Coordinator

Monika Zingaro
Administration Coordinator

REGISTRATION AND EXAMINATIONS

Erica Laugalys
Director

Maryam Katozian
Acting Registration Manager/Registration
Coordinator

Sahrish Ali
Manager, Registrations (Leave of Absence)

Marita Dias
Entry-to-Practise Coordinator

Tuyen Le
Examinations Coordinator

Anum Jamal
Examinations Coordinator

PROFESSIONAL CONDUCT

Natalia Vasilyeva
Manager

Rebecca McBride
Coordinator

PROFESSIONAL PRACTISE

Dr. Mary-Ellen McKenna, ND (Inactive),
Manager

Daniella Abate
Coordinator

Joseph Quo
Administrative Assistant

COMMUNICATIONS

Ian D'Costa
Communications Officer

Assya Bounoua
Administrative Assistant

¹ As of September 1, 2021.

LETTER FROM THE CEO



On behalf of the Council and the staff of the College, I am pleased to present our 2021-2022 Annual Report. This report covers the period from April 1, 2021, to March 31, 2022.

As I've remarked time and time again, change is inevitable. It's what we do with that change, and how we direct it that matters most, especially when it comes to new pursuits that help us better support safe practice and protect the public.

2021 has proven to be exactly that kind of year, with the College embarking on several exciting new ventures spanning a wide breadth.

These projects include vocational and educational initiatives, expanding our stakeholder engagement, achieving a fully bilingual communications capability, and enacting novel governance and risk programs.

Through our monthly news blast, iNformeD, we actively engage Registrants with timely content and important information revolving around significant milestones, reporting, updates and deadlines, news and events.

We opened a new portal of communication and engagement with our first-ever social media presence, allowing us to reach more members of the profession and the public than before. By undertaking a full French translation of our website and forms, we have taken a critical step towards achieving a fully bilingual communications capability to meet the best practices outlined in the *Official Languages Act*.

Perhaps the crown jewel, however, of our stakeholder and professional engagement piece is our innovative moderated townhall series, In Conversation With, which allows attendees to pose questions and queries directly to College staff, Council members, and volunteers to get answers directly from the source, or the experts versed in relevant fields. In Conversation With has quickly proven

to be a rich educational vehicle that increases accessibility to the College's staff itself, while answering important questions that help Registrants better and more safely practice the profession.

Among our most important projects this past year is our Volunteer Program. Through the newly launched Mentoring Program, we empower registrants with the necessary knowledge and skills to further hone their competencies and careers while also encouraging more volunteer recruitment. Currently there are over 100 active volunteer members with the College who lend their valuable expertise and time to advance the profession.

Among the many leading approaches the College is undertaking is a new risk-based regulation approach where potential risk factors are assessed to mitigate potential risk of future harm to the public. An optimal solution is then enacted in keeping with the nature of the circumstance. This preventive approach ensures greater understanding and will aid good practice at large and serve the public interest.

As the College paves the way for the profession to operate, we are continually thinking of new ways to ensure adherence to consistent standards and public safety by ensuring competent and safe practice.

Looking ahead into the promise and opportunities of the coming year, I invite you to take a look at what we've done during the past year as outlined in our 2021-2022 Annual Report, and if you have any comments or questions at all, to email me directly at andrew.parr@collegeofnaturopaths.on.ca.

Andrew Parr, CAE
Chief Executive Officer

REGISTRATION & EXAMINATIONS

REGISTERING SAFE, COMPETENT, AND ETHICAL INDIVIDUALS

OVERVIEW

This program area oversees:

- entry-to-practise examinations,
- initial registration (entry-to-practise),
- ongoing Registrant 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. Ontario Biomedical Exam
2. Ontario Clinical (Practical) Exams.
3. Ontario Clinical Sciences Exam.
4. Ontario Jurisprudence Exam.

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 & Therapeutics Exam is for NDs who want to prescribe, compound, dispense, and sell a drug, or inject a drug or substance.
- The Ontario Intravenous Infusion Therapy (IVIT) Exam is for NDs who want to provide intravenous infusion therapy to patients. Naturopaths who wish to offer IVIT must pass both the Prescribing & Therapeutics Exam and the Ontario IVIT Exam.

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

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.

Entry-to-Practise Examinations

The College administers four entry-to-practise Ontario-based exams; together, these exams are used to determine whether an individual has the knowledge, skill and judgment to practise safely, competently and ethically as a naturopath in Ontario.

The Ontario Clinical Sciences Examination is a mix of case-based and stand-alone questions, which test for clinical readiness and emphasise a candidate's ability to apply their knowledge and critical thinking. The Ontario Biomedical Examination is a series of stand-alone questions which tests foundational knowledge of body systems and their interactions, body functions, dysfunctions and disease states. The Ontario Clinical (Practical) Examinations are demonstration-based exams that assesses a candidate's entry-level competencies in naturopathic manipulation, acupuncture, and physical examination/instrumentation. The Ontario Jurisprudence Exam 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 examination(s) on their third attempt, they are required to complete an additional program in naturopathy accredited by the Council on Naturopathic Medical Education (CNME).

Four sessions of the Ontario Clinical (Practical) Exams occurred in this reporting period: July 2021, September 2021, October 2021, and February 2022 to account for exam postponements that occurred in February 2021 as a result of COVID-19. Examination capacity was capped at 42 candidates per exam session to maintain safety protocol.

Ontario Clinical (Practical) Exams Statistics

	2020–21	2021–22
Overall pass rate	75%	82%
Number who sat exam	75	136*
Total passed	62 57 (1 st attempt) 5 (2 nd attempt)	111 81 (1 st attempt) 29 (2 nd attempt) 1 (3 rd attempt)
Failed*	13 9 manipulation 2 acupuncture 5 physical exam	25 10 manipulation 13 acupuncture 4 physical exam

* The failed modality breakdown factors in candidates who failed more than one modality in their examinations.

Jurisprudence Exam Statistics

Enrolment in the Jurisprudence Exam was on par with 2020–21, however pass rates fell slightly as a result of candidates electing to enrol but waiting to complete the exam only once other entry-to-practise examinations were successfully completed.

Total passed

2020–21	2021–22
94	87

New entry-to-practise exams

In November 2020, the College launched the second of its two new entry-to-practise examinations, the Ontario Biomedical Examination, to replace the North American Biomedical Examination as a requisite entry-to-practise examination in Ontario; the first, the Ontario Clinical Sciences Examination, having launched in April 2019. Due to COVID-19 and subsequent exam cancellations resulting in candidates being unable to sit entry-to-practise examinations as scheduled, the full transition to the Ontario Biomedical exam was postponed, allowing applicants for registration to continue to use the North American Biomedical Exam for meeting entry-to-practise requirements until the extended exam transition deadline of May 15, 2021, as outlined in the College's Exam Transition Policy. September 2021 signalled the first full cohort of candidates sitting the College's Biomedical examination following the May 15, 2021, transition date.

The Ontario Clinical Sciences and Ontario Biomedical Examinations are intended to work together, in conjunction with the Ontario Clinical (Practical) Exams and Jurisprudence Exam, 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.

Meazure Learning—a leading psychometrics firm and online exam delivery and proctoring company, following the merger of Yardstick Assessment Strategies and ProctorU—helped guide the development and continues to assist with the ongoing maintenance process and administration of both exams.

Exam pass marks are set through a psychometrically sound process called the "modified Angoff method", which accounts for the difficulty of exam content and an established profile of what a naturopath can be

expected to know and be able to do at entry-to-practise. For quality assurance purposes, three separate rounds of scoring are done for each administered exam (one through psychometric software and two independently via psychometric experts) prior to the release of results.

Ontario Biomedical Exam Statistics

Two sessions of the Ontario Biomedical Examination occurred in this reporting period: September 2021 and March 2022.

To mitigate the impact of COVID-19 on the administration of the Ontario Biomedical examination, the College offered the exam through a secure online exam delivery and proctoring platform during the reporting period. This platform allowed candidates to sit the examination from a personal home computer or laptop, rather than in-person at a testing center location.

	2020-21	2021-22
Overall pass rate	55%	81%
Candidate	9	98
Total passed	5 <small>4 (1st attempt) 1 (2nd attempt)</small>	79 <small>73 (1st attempt) 6 (2nd attempt)</small>
Failed	4	19



Ontario Clinical Sciences Examination Statistics

Two sessions of the Ontario Clinical Sciences Examination occurred in this reporting period: August 2021 and February 2022.

As with the Ontario Biomedical Examination, the Ontario Clinical Sciences Examination was offered online through the secure online proctoring and administration platform.

	2020–21	2021–22
Overall pass rate	74%	70%
Candidate	120	106
Total passed	89	74
	60 (1 st attempt) 18 (2 nd attempt) 11 (3 rd attempt)	58 (1 st attempt) 16 (2 nd attempt) 0 (3 rd attempt)
Failed	31	32

Examination Appeals Committee

The Exam Appeals Committee develops policies and procedures governing the appeal process for College-administered examinations. It also reviews appeals filed by candidates related to failed entry-to-practise and post-registration examinations. An appeal can be filed if 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.

Three appeals were filed during this fiscal year, all of which were upheld by the Committee.

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 practise, 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 CEO of the College. However, if information comes forward during the application process that suggests that the applicant may not meet the entry-to-practise requirements, the application is referred to the Registration Committee for consideration.

	2019–20	2020–21
Applications Received	72	72
Certificates issued*	71	77

* 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

The Registration Committee, considers applications for registration referred to it by the CEO of the College where they:

- have doubts on reasonable grounds that the applicant fulfils the registration requirements;
- believe that a term, condition or limitation should be imposed on the applicant's Certificate of Registration; or
- propose 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/past conduct**, where the applicant's history indicates that they may not be governable or are unlikely to follow the rules set out by the College; or
- **physical or mental condition or disorder**, which may impact an applicant's ability to practise safely and professionally.

Referrals to the Registration Committee

2020–21

6

2021–22

15



Registration Committee Outcomes

The following summarises the outcomes of the matters referred to the Registration Committee by the CEO*.

	2020–21	2021–22
Certificate issued at application	2	7
Certificate issued after completing additional exams	0	0
Certificate issued with terms, conditions or limitations	0	2
Certificate issued after completing more education or training	4	6
Denied registration	0	0

* Includes applicants who were mandated to complete more than one requirement (e.g., exams and additional education) prior to issuance of a certificate.

Decisions of the Registration Committee, except for a decision to direct the CEO to issue a certificate of registration, can be appealed to the Health Professions Appeal and Review Board (HPARB). The Board is discussed in more detail on page 32.

REGISTRANTS OF THE COLLEGE

Registration renewal

Naturopaths must renew their registration every year in order to maintain their status as Registrants of the College. This includes 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
2. Inactive Class—naturopaths who do not currently practise the profession, including Retired Registrants, or those who do not practise in Ontario.

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

Overall, there was a 0.4% increase in total Registrants in this fiscal year indicating relative stability in the longevity of the profession in Ontario.

Renewal statistics

As of March 31, 2022, 98% of Registrants had renewed their registration for the 2021 registration year, with submission of both their fee (or enrolment in the College's Payment Plan program and the Information Return form.

	2020–21	2021–22
% renewed by March 31, 2021	98%	98%
# resignations	20	35
# revocations*	21	8
# reinstatements (lifted suspensions)	19	16

**As set out in section 16 of the Registration Regulation, a Registrant'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.*

Registration by class

(# of Registrants)

	2020–21	2021–22
General Class	1,531	1,550
Inactive Class	179	168
Life Registrants	23	22
TOTAL	1,733	1,740

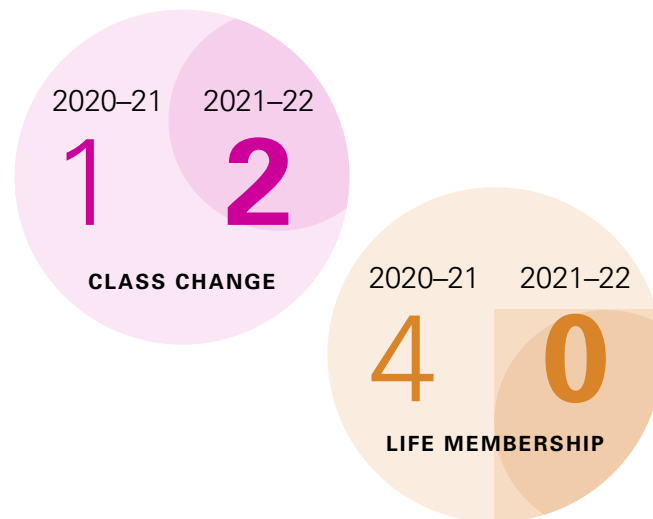
Changes to Registrant class

	2020–21	2021–22
Class Change GC- IN	44	32
Class Change IN-GC (under 2 years)	8	8

Referrals to the Registration Committee

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

1. Registrants who wish to change their class of registration from Inactive to General where they have been inactive for more than two years; and
2. applications from Registrants for Life Registration.



POST-REGISTRATION EXAMINATIONS FOR EXTENDED SERVICES

These examinations are administered primarily to Registrants 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 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 can perform these high-risk procedures safely, competently, and ethically.

Prescribing and Therapeutics Examination

This examination 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. In 2018, policy changes extended exam eligibility to NDs registered in another regulated Canadian jurisdiction and 4th year students enrolled in a CNME-accredited program in naturopathy.

53 Registrants met the Standard of Practice for Prescribing in 2020–21. In total, 826 Registrants, or about 53% the profession, have passed the exam since its inception in June 2014.

Enrolment in the examination increased by 137% in 2021 as a result of the College being able to offer more than one session of the examination, as occurred in 2020 due to COVID-19. To help offset 2020 exam cancellations, and exam capacity limitations that continued to be imposed in 2021 due to provincial and facility restrictions for indoor gatherings, three sessions of the Ontario Prescribing and Therapeutics examination were offered in this reporting period in June, August and October.

	2020–21	2021–22
Overall pass rate	68%	55%
Passed	24	46
Failed	11	37

2021-22 Prescribing Exam failures by component

22	8	7
Written	Oral	Both

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.
- taking sufficient time to remediate knowledge following an unsuccessful exam attempt.
- reading all questions fully, especially in the cases presented in the oral exam; and
- managing time to answer questions.

Intravenous Infusion Therapy (IVIT) Examination

Naturopaths who wish to perform IVIT must meet two specific standards of practice.

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

Two sessions of the IVIT Examination were offered in this reporting period in June and December. To maintain safety measures, registration was capped at 20 candidates per exam session.

	2019–20*	2021–22
Overall pass rate	81%	53%
Passed	51	20
Failed	12	18

*Both sessions of the IVIT Examination scheduled in 2020-21 were cancelled as a result of COVID-19.

2021-22 IVIT Exam failures by component

3	5	1
Osmolarity	Written MCQ*	Practical
7	1	1
Osm & MCQ**	Practical & MCQ	Practical & OSM

* Multiple choice questions

** Osmolarity and multiple-choice questions

PROFESSIONAL CORPORATIONS

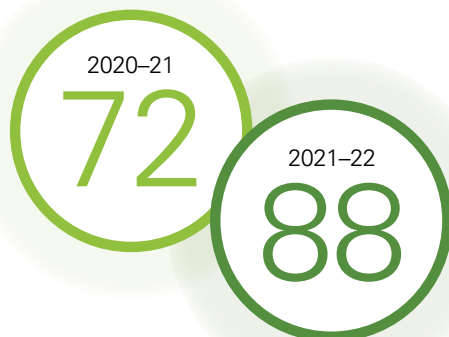
Naturopaths may incorporate under the *Business Corporations Act* to practise a health profession. To do so, Registrants must apply for, and receive, a Certificate of Authorization from the College. As this process includes both an application and evaluation process as well as an annual renewal of the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

Corporation applications data

	2020–21	2021–22
New applications	14	16
Approved	14	16
Denied	-	-
Closed for incompleteness	-	-

As of March 31, 2022, the College had issued a total of 104 Certificates of Authorization for Naturopathic Professional Corporations.

**Renewals
approved
for existing
corporations**



THE PUBLIC & INFORMATION REGISTER: Information about all Ontario naturopaths

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

1. The **Naturopathic Doctor Register** contains detailed information about all naturopaths registered with the College, including their registration type, status, practice information, and whether they have met the requirements to provide certain additional services.
2. The **Professional Corporations Register** business corporations authorized by the College through which naturopathic services can be provided, including all naturopaths who hold shares or are directors and the name of the practice being operated by the Corporation.
3. The **Intravenous Infusion Therapy (IVIT) Premises Register** 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 **Unauthorized Practitioner Register** 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

The second of our four key functions is to set and maintain standards of practice of the profession that guide our Registrants to ensure they provide safe, competent and ethical patient care. Standards of practice also serve to guide and inform the public on what to expect from a naturopath in key areas of practice.

STANDARDS AND GUIDELINES FOR THE PROFESSION

The College has established and maintains 28 **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 11 **practice guidelines** to help Registrants 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.

of inquiries received

	2020–21	2021–22
	897	803
 BY E-MAIL	585	479
 BY PHONE	312	324

In 2021–22, COVID-19 and scope of practice were the issues most asked about, followed by laboratory testing, completing forms and letters for patients, telepractice, record keeping, patient visits, fees and billing, Inspection Program-related inquiries, and advertising.



Top 10 Topics

	2020-21	2021-22
COVID-19	148	91
Scope of practice in Ontario	56	70
Laboratory tests	31	52
Completing forms and letters for patients	13	50
Telepractice	74	49
Record Keeping	26	45
Patient visits	35	35
Fees and billing	36	27
Inspection Program	46	17
Advertising	33	21

The **Regulatory Guidance section** of our website houses a number of articles and information sheets about the issues either most commonly asked about by Registrants or issues the College wishes to highlight for both Registrants and the public.

Ongoing Review of the Standards and Guidelines

The Quality Assurance Committee is responsible for maintaining the standards of practice and guidelines for the profession.

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

Standard & Guideline Review Statistics

	2020-21	2021-22
Standards reviewed	2	12
Standards amended	1	1

This fiscal year:

- The Core Competencies were reviewed and updated.
- The definition of vaccine in the College's Vaccination Policy was updated.
- The Committee began a review of all of the active standards of practice

	2019-20	2020-21
Guidelines reviewed	—	1
Guidelines amended	—	1
Guidelines created	2	—

This fiscal year:

- the COVID-19 opening guideline was amended on August 16, 2021, January 6, 2022, and was lifted on March 21, 2022.

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 drugs to make a customised 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 works to ensure the safety and quality of care for Ontarians who choose to access Intravenous Infusion Therapy (IVIT) from a naturopath. All premises where an IVIT procedure is performed must meet strict standards because of the added risk associated with this procedure. An IVIT procedure is one or both of administering a substance by IVIT and/or reconstituting, diluting, mixing, preparing or packaging a customized therapeutic product for a patient. The College enforces these standards through the inspection program.

The inspection program is set out in the *General Regulation* made under the *Naturopathy Act, 2007*.

The Regulation requires that any new premises must successfully pass an inspection in order to provide IVIT procedures to patients. Additionally, the Regulation also required that all existing premises at the time the Regulation came into effect be inspected before March 1, 2019. The College's inspection program met this requirement. These premises will now be inspected every five years from the date of their initial inspection. None of these inspections were required this year.

Inspections Completed

	2020–21	2021–22
Existing premises	—	7
New premises—Part I	14	20
New premises—Part II	18	20

A Part I inspection occurs once a clinic has been readied to open but before any IVIT procedures are performed. It includes a review to ensure that the program requirements that must be in place have been met in order to ensure that the clinic is fully prepared to perform IVIT procedures safely and competently.

A Part II inspection involves a review of the program 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.

Occurrence Reports

Under the Inspection Program, Registrants are required to report important information, referred to as occurrence reports, to the College. There are two type of occurrence reports, a Type 1 Occurrence Report, which is required when certain events occur with patients and Type 2 Occurrence Reports, which contain information about adverse reactions and is provided to the College annually.

A Type 1 occurrence is an outcome that happens following the administration of IVIT to a patient and includes:

1. The death of a patient at the premises after a procedure was performed.
2. The death of a patient that occurs within five days following the performance of a procedure at the premises.
3. Any referral of a patient to emergency services within 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 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 Registrant is of the opinion that the patient is or may have been infected because of the performance of a procedure.

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



Type 1 Occurrences Reported

Number

2020–21

2021–22

Any referral of a patient to emergency services within the 5 days following the performance of a procedure at the premises.

13**11**

The administration of an emergency drug to a patient immediately following an IVIT procedure.

1**0**

The death of a patient that occurs within 5 days following the performance of a procedure at the premises.

2**2**

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 years reported, the patients were receiving adjunctive care* from a naturopath at the premises for a terminal illness and their death was the result of their illness not the provision of IVIT.

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 an inspection of the premises,
- directed the CEO to refer the report to the Quality Assurance Committee if the Inspection Committee believed that the knowledge, skill or judgement of the Registrant who performed the procedure was unsatisfactory; or
- directed the CEO to refer the report to the Inquiries, Complaints and Reports Committee if the Inspection Committee believed that the Registrant 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.

Type 2 Occurrences

All premises where intravenous IVIT procedures are performed are also required to track Type 2 occurrences and must report these to the College every year.

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 Registrant within five days after an IVIT procedure was performed at the premises.
- Any adverse drug reaction in a patient after an IVIT procedure was performed at the premises.

Type 2 Occurrence Reports were received from the 175 premises performing IVIT procedures, of which 32 reported one or more Type 2 occurrence. For the March 1, 2021 – March 2, 2022 period, designated Registrants were asked for the first time to report an estimate of the number of IV bags they compounded at the premises and the number of times IVIT was administered. A total of 79,068 IV bags were compounded and 77,213 were administered.

A total of 167 Type 2 occurrences were reported to have happened during 77,213 IVIT administrations. This is a 0.2% rate of Type 2 occurrences during the past reporting period.

Type 2 Occurrences Reported

	March 2, 2020– March 1, 2021	March 2, 2021– March 1, 2022
Infections occurring in a patient in the premises after an IVIT procedure was performed at the premises.	0	1
Unscheduled treatments of a patient by a Registrant occurring within five days after an IVIT procedure was performed at the premises.	9	5
Adverse drug reactions occurring in a patient after an IVIT procedure was performed at the premises.	114	161

* Adjunctive care is treatment that is in addition to other forms of care a patient is receiving.

Type 2 occurrence 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 Registrants 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.

Inspection Committee

The Inspection Program is supported by an Inspection Committee of IVIT-qualified naturopaths and a member of the public. The Inspection Committee reviews the inspection reports received by the College and assesses the outcomes from the reports. The Committee determines whether a premises may open or continue providing IVIT services. The Committee also receives information about occurrence reports and, in the case of Type 1 Occurrences, determines if additional follow up is necessary.

The Committee met 7 times during the reporting period and delivered 42 final outcomes (results).

Inspection Outcomes

	2020–21 # of Premises	2021–22 # of Premises
Final outcome of a pass	35	27
Preliminary outcome of a pass with conditions and final outcome of a pass	30	13
Preliminary outcome of a pass with conditions and final outcome of a pass with conditions	5	1
Preliminary outcome of a pass with conditions, final outcome not delivered in the same fiscal year	0	3
Preliminary outcome of a fail and a final outcome of a pass	0	1

PATIENT RELATIONS PROGRAM

A Patient Relations Program is mandated under the legislation governing the College and includes developing and delivering measures for preventing and dealing with sexual abuse of patients. It does so by:

- establishing educational requirements for Registrants;
- creating guidelines for conduct of Registrants with patients;
- training College staff; and
- providing information to the public.

The Patients Relations Program, overseen by the Patient Relations Committee, also includes a program that provides Funding for Therapy and Counselling for patients who might have been sexually abused by a naturopathic doctor.

During the reporting period the Patient Relations Committee received and approved one new application for funding for therapy and counselling, bringing the total of approved funding applications to 5. The Funding program provided \$11,727.80 during the reporting period and a total of \$27,089.80 since its inception.

In addition to overseeing the Funding program, the Patient Relations Committee reviewed and updated its program policies to ensure they align with the program deliverables, drafted a number of boundary scenarios to be used by the College in communications to the profession, and created an informational letter that was sent to Ontario regional police services and sexual abuse support centres.

SCHEDULED SUBSTANCES REVIEW COMMITTEE

The Scheduled Substances Review Committee (SSRC) oversees a process of continuous review of the regulations governing the drugs and substances that naturopaths may prescribe, dispense, compound, sell and inject, including those by IVIT. 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.

At the direction of the Council, the SSRC has been tasked with undertaking a review of the scope of practice of the profession. During the reporting period the SSRC initiated a consultation on the proposed approach of defining the scope of practice of the profession using a list of diseases, disorders and dysfunctions.

During the reporting period, ongoing meetings were held with representatives of the Ministry of Health to review the drug submission made by the Council in 2019. Staff, in conjunction with the Council Chair, answered questions and provided additional information as requested by the Ministry regarding the Council's amendments to the schedules of the *General Regulation* made under the *Naturopathy Act, 2007*. The Ministry initiated a public consultation on the proposed amendments in January 2022.



QUALITY ASSURANCE

Ensuring Continuing Competence through Education

Our Quality Assurance (QA) Program, overseen by the Quality Assurance Committee, ensures that naturopaths stay current in order to provide quality 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 must participate in the Program and demonstrate a commitment to ongoing learning and improvement.

1. Self Assessment

This component helps naturopaths reflect on their skills with respect to the core competencies and standards of practice of the profession.

During the reporting year, the Quality Assurance Committee developed seven online self-assessment questionnaires related to a number of standards of practice including: record keeping, conflict of interest, delegation, fees and billing, informed consent, sexual abuse and boundaries, and telepractice. Registrants were required to complete a total of three self-assessment questionnaires. This included one mandatory record keeping self-assessment and two additional self-assessments of their choosing.

2. Continuing Competency and Professional Development

General Class 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 IVIT must complete an additional six credits of clinical learning. Registrants may also undertake additional credits that further their professional development.

Due to the impact of the COVID-19 pandemic, the Quality Assurance Committee reduced the number of required CE credits while ensuring that Registrants remain compliant with the QA program. During the reporting period, Registrants were required to submit two-thirds of the required number of CE credits for their cycle.

	2020-21	2021-22
# of Registrants required to complete the self-assessments by March 31, 2022 deadline	1,511	1,551
# of Registrants who completed the self-assessments by the deadline	589 (39%)	1,142 (73.6%)

CE Reporting

	2020-21	2021-22
# of Registrants required to report CE	449 (Group III)	491
% submitted CE logs by deadline	99%	97.6%
CE log extensions/amendments granted	8 of 16 requests	2 of 16 requests

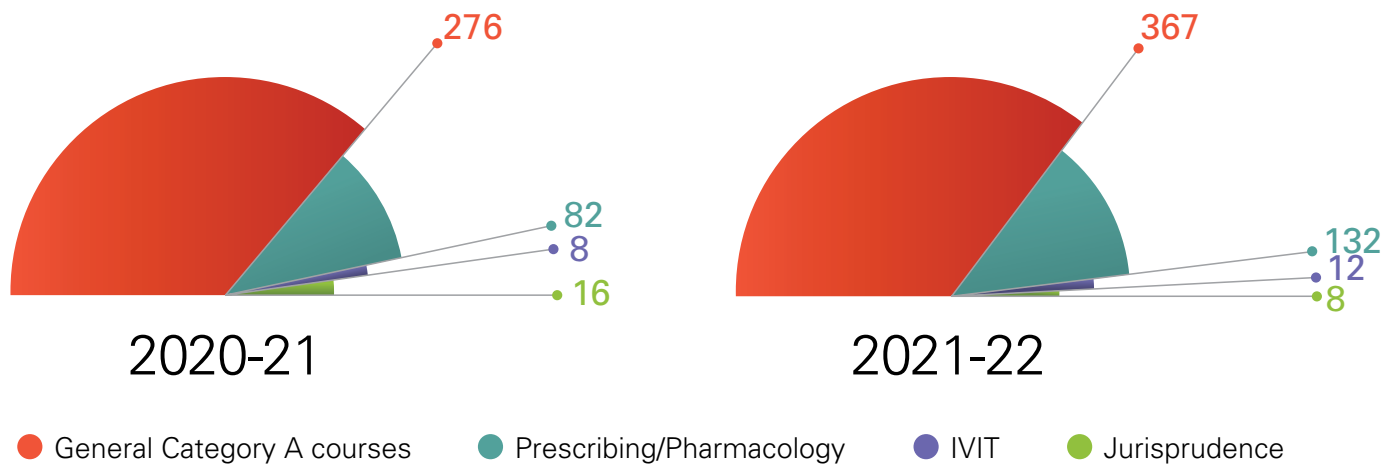
Category A—The College approves specific courses to be eligible for Category A Continuing Education (CE) credit. These courses are structured learning activities that address the core clinical competencies of the profession.

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

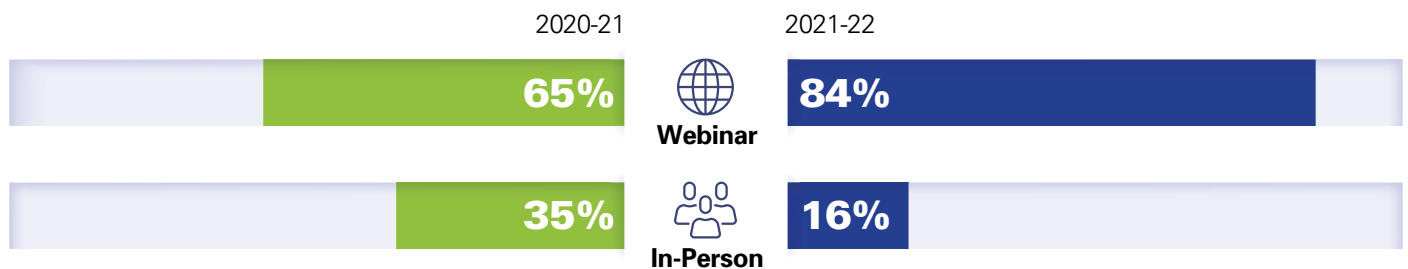
Number of approved Category A courses

	2020-21	2021-22
Category A credit applications received	509	603
% approved	75%	86.1%

Approved Category A courses by category



Course delivery modalities



3. Peer and Practice Assessment

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

Peer and practice assessments may also occur on the recommendation of the Quality Assurance Committee for Registrants who have failed to meet the CE requirements. Three Registrants were required to undergo a Peer and Practice Assessment.

	2020-21	2021-22
Registrants randomly selected	-	50
Completed peer and practice assessments	3	44
Referred to the ICRC for non-compliance with the QA Program	-	1
Removed from the selection pool	-	5
Reasons for removal from selection pool		
Deferred	-	3
Changed class to Inactive	-	2
Outcome for Registrants who fell below the standards		
Demonstrated the knowledge, skill and judgment to meet the standards	-	42
Fell below the standards in at least one component of the assessment and were referred to the QA Committee	3	2
Outcome for Registrants who fell below the standards		
Registrant's submission to the QA Committee demonstrated deficiencies were adequately addressed and knowledge, skill and judgment is satisfactory	3	1
Registrant's submission is pending	-	1

**The Quality Assurance Committee decided to suspend the peer and practice assessment component of the Q A Program for 2020-21 due to the COVID-19 pandemic.*

PROFESSIONAL CONDUCT

Accountability through Complaints and Discipline

Inquiries, Complaints and Reports Committee

The College receives complaints and reports about the practice and conduct of naturopaths. All complaints are investigated. With approval from the Inquiries, Complaints and Reports Committee (ICRC), the College 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.

Our website includes anonymised summaries 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

	2020–21	2021–22
New Complaints Received	9	28
New CEO's inquiries initiated*	26	17
Matters closed	27	38

*Origins of CEO's Inquiries

	2020–21	2021–22
Public inquiries	13	6
Matters reported by Registrants	0	2
Matters reported by other departments	3	3
Referral from ICRC to CEO	26	5
Referral from another regulator	1	1
Referral from the QA Committee	3	0

The ICRC took the following actions in response to the complaints/reports reviewed. All decisions made by the ICRC can be appealed to the Health Professions Appeal and Review Board (HPARB), which is discussed in more detail on page 32.

	2020–21	2021–22
TOTAL decisions	27	38
No further action	4	6
Letter of advice/Counsel	13	14
Oral Caution	5	13
Specified Continuing Education and Remediation Program (SCERP)	20	9
Acknowledgement & Undertaking	0	0
Referral to Fitness to Practise Committee	0	0
Referral to Discipline Committee	7	6
Frivolous and vexatious	0	0

Types of Complaints/ CEO's investigations before the ICRC

	2020–21	2021–22
Advertising	22	13
Inappropriate billing procedures	4	9
Inappropriate/unsatisfactory patient care	4	11
Practising outside their scope	13	8
Failure to comply with the Standard for IVIT/Injections	3	5
Sexual abuse, violation of professional boundaries	1	4
Failure to cooperate or comply with an order of Discipline Committee/ICRC	3	1
Practising while Inactive/Suspended	4	1
Record keeping	3	5
Lab Testing	3	0
Delegation	2	0
Harassment	1	0
QA Program comply	3	0
Failure to cooperate	3	2
Unprofessional, unbecoming conduct	1	4

Trends in the matters reviewed by the ICRC continue to be about the advertising of services that naturopaths are not authorized to perform, including Intravenous Infusion Therapy 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 *INformeD newsletter* and the **College's blog**.

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

Investigation timelines: Complaints/CEO's Reports

	2020–21 # of days	2021–22 # of days
Average length	456	212
Shortest	70	64
Longest	2,102	846

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 Registrant and HPARB are notified every 30 days. The average investigation timeframe this year was affected by four sexual abuse investigations initiated in 2015–16 which were on hold until late 2018 pending receipt of the judgment in relation to a relevant criminal charge.

Investigation costs: Complaints/CEO'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.

	2020–21	2021–22
Average cost to the College	\$4,997	\$4,881
Highest cost	\$13,938	\$18,818
Lowest cost	\$187	\$150

ICRC & FITNESS TO PRACTISE

When information comes to the College's attention that a naturopath may be incapacitated, the CEO 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 Registrant 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 Registrant is suffering from a physical or mental condition or disorder that makes it desirable in the interest of the public that the Registrant's certificate of registration be subject to terms, conditions or limitations, or that the Registrant no longer be permitted to practise.

The ICRC conducted no health inquiries during the reporting period.

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 the matter 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 Registrant's certificate of registration.

The Discipline Committee is independent of the Council of the College although it is supported by many of the same Registrants 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 on **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 on the **Discipline Outcomes webpage** indefinitely.

Discipline statistics

	2020-21	2021-22
Discipline hearings completed	7*	1
Findings of professional misconduct	7	1
Number of hearing days	10	1
Number of referrals from ICRC	7	4
Fitness to Practise hearings	-	-
Reinstatement hearings	-	-
Divisional court reviews	-	-

* 6 uncontested and 1 contested hearings. For the contested hearing (TR DC18-01) the Committee held a four-day hearing and issued a decision-making finding on some of the allegations. However, the penalty portion of the hearing was held in the next reporting period (May 2021).

Discipline hearings completed: 1

CoNO & Natasha Turner

The Registrant was found guilty of professional misconduct.
Hearing date: October 29, 2021

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 Registrant 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 regarding the discipline matters completed in the reporting period:

CoNO & Natasha Turner (CoNO file DC20-02)

- Legal costs and expenses: \$22,145.75
- Investigation costs: \$0
- Hearing costs: \$1,425.00

Total cost to the College: \$23,570.75

The Panel ordered the Registrant to pay the College's costs fixed in the amount of \$5,000, which amounted to 21% of the College's costs.

FITNESS TO PRACTISE COMMITTEE

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

	2020-21	2021-22
Cease and desist letters issued	18	15
Injunctions-granted:	—	—

DISCIPLINE DECISION SUMMARY

Full discipline decisions are available in the online **Public Register** under the Registrant's profile and on the **Discipline Hearings page** of our website.



Natasha Turner
(Resigned as of May 10, 2022)
Registration #0894
Hearing Date: October 29, 2021

Summary of Allegations:

- Advertising protection against and treatment of COVID-19.
- Promoting an immune boosting kit to help prevent and protect individuals from COVID-19.
- Acting in a conflict of interest by engaging in advertising that could improperly influence the Registrant's professional judgement and duty to act in the best interest of their patients.
- Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by Registrants as disgraceful, dishonourable or unprofessional.

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

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 Registrant had accepted responsibility for their actions and had agreed to an appropriate penalty which provided for specific and general deterrence, rehabilitation, and monitoring.

Order

The Discipline Panel (the Panel) imposed an order:

1. Requiring the Registrant to appear before the panel to be reprimanded immediately following the hearing of this matter.
2. Directing the Chief Executive Officer ("CEO") to suspend the Registrant's certificate of registration for a period of three (3) months, to commence on the date of the hearing of this matter.
3. Directing the CEO to impose the following specified terms, conditions and limitations on the Registrant's certificate of registration:
 - a. Requiring that the Registrant unconditionally pass, at their own expense, the ProBe course in ethics and boundaries, no later than six (6) months from the date of this Order; and
 - b. Requiring that the Registrant write an essay between 1000 and 1500 words in length and provide it to the CEO, no later than a date selected by the CEO, that shall be published by the College at a time and in a format determined by the CEO, on the following issues:
 - i. The lessons they learned in completing the ProBe course; and
 - ii. The methods they will incorporate into their practice to ensure proper compliance with the standards and their obligations as a member of the College.
 - c. Requiring the Registrant to pay a fine of \$350.00 to the Minister of Finance within two (2) months of the date of the hearing of this matter.
 - d. The Registrant shall pay the College's costs fixed in the amount of \$5,000.00, payable on a schedule to be set by the CEO.

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

HOLDING THE COLLEGE ACCOUNTABLE

As a health regulator, the College is accountable to several 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. Ministry staff remain an important part of the process to appoint public members to our governing Council.

In the 2021-22 reporting period:

The Council welcomed two new public members Paul Philion and Tiffany Lloyd. Public members of Council are appointed by the Lieutenant Governor in Council.

Health Professions Appeal and Review Board (HPARB)

While the role of the College is to hold its Registrants accountable for their conduct, 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, Complaints and Reports Committee (ICRC). 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 CEO to issue a certificate of registration;
- directing the CEO to issue a certificate of registration after the applicant has completed additional education, training or examinations;
- directing the CEO 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 CEO to issue a certificate of registration, can be appealed to HPARB.

	2020-21	2021-22
Decisions appealed	1	0
Outcome(s)	1 RC decision upheld	0

Complaint Decisions

Either the person who files a complaint or a Registrant who was the subject of a complaint can request HPARB to review the ICRC's decision on a complaint within 30 days of receipt of the decision. When the ICRC is considering a complaint that has been made to the College, it has a set number of outcomes available to it, including:

- take no further action, if it finds there is insufficient evidence to support the allegations;
- issue a Letter of Counsel;
- require the Registrant to complete a specified continuing education or remediation program;
- require the Registrant to appear before a panel of the ICRC to be cautioned;
- accept the Registrant's undertaking to improve his or her practice or to restrict his or her practice;
- accept an undertaking from the Registrant 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 Registrant is suffering from a physical or mental incapacity.

The ICRC may include in a decision one or more of the outcomes available.



	2020–21	2021–22
Appealable ICRC decisions	11	14
Decisions appealed	2	0
Outcomes	3*	1*

* One decision of the ICRC, appealed in previous reporting year, was confirmed by the Board.

Office of the Fairness Commissioner of Ontario

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

In 2019 the College received the outcome of the OFC's 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. Considerable work was undertaken in 2020 to review and revise the PLAR and in 2021, the College was assigned a compliance category of 'full compliance', and risk category of 'low risk' as a result of having addressed all noted OFC identified gaps from the 2019 audit.

Human Rights Tribunal of Ontario

The College is indirectly accountable to the Human Rights Tribunal of Ontario (HRTO) to ensure that our 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 2019, a College Registrant filed a claim against the College with the HRTO alleging that they were discriminated by the College as a result of a complaint filed against the Registrant and the decision of the ICRC directing that the Registrant successfully complete an ethics course. The claim is still under review by the HRTO.

The Courts

Individuals interacting with the College may choose to seek relief from the courts. For example, if a Registrant 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 Registrant 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 manner (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, Registrants, 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, 1991*.

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

COMMUNICATIONS

The Communications team supports the College in fulfilling its role to regulate naturopathy in the public interest. 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 regulatory requirements that serve to protect the public so they can apply these to their practices.



Engaging Registrants and the Public with a Landmark Townhall Series

Increasing the College’s external engagement is an important part of the Communications team’s overall mission. To that end, we designed, organized, and delivered a new landmark townhall-format series, *In Conversation With*, that provides Registrants and members of the public an opportunity to learn more about the functions of the College, our role in regulating the profession, and other critical necessities involved in practising naturopathy in Ontario. To date, the College has led all other healthcare regulatory bodies with this new series and will be increasing the scope and frequency over the coming year, with new guest speakers and more relevant topics of discussion and learning.

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COVID-RELATED SUPPORT

- COMPREHENSIVE FAQ ON COVID-19 AND RELATED QUESTIONS
- TRIAGE FOR INCOMING E-MAIL QUERIES

Launching a Social Media Presence

In accordance with the Communication team’s revised and revamped operating strategy, the College launched its inaugural social media presence in early 2022. These profiles on **LinkedIn** and **Facebook** allow us to reach more naturopaths and public members than ever before, giving us a unique and vital opportunity to offer more information, timely updates and news to both the profession and the public, while increasing engagement. The College’s presence is also bilingual in keeping with the *Official Languages Act*.



Online Communications

Readership rates well above the industry norm

11 *iNformeD* newsletters

13 blog posts

24 news articles



Website
321,994
unique pageviews

Top 3

- Home page
- Prescribing Exam
- Apply for Registration

Achieving a Bilingual Digital Presence

We identified an online bilingual presence as a critical priority for College communications this year, allowing us to reach more Ontarians and maintain compliance with the *Official Languages Act*. To accomplish this, we undertook a large-scale translation project in collaboration with our external translation partners that will enable the College to achieve a bilingual online presence across its website and social media channels well before the end of 2022.

Support to College Programs & Activities

- Governance Review
- Ongoing Communications advising
- Media relations & issue management
- Writing & editing: news bulletins, web content including blogs and news articles, annual report, surveys, infographics, other publications
- Registration renewal
- Volunteer recruitment



NOTE TO SUMMARY FINANCIAL STATEMENTS

The College is including an abridged version of the Audited Financial Statements for the period April 1, 2021 to March 31, 2022 in this report to provide the reader with the overall outcomes for the fiscal year.

The summary financial statements have been prepared from the audited financial statements of the College for the year. 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. However, any notes identified in the statements themselves have not been included in this report; however, they are included in the **Complete audited financial statements** which are available on the College website and may also be obtained by e-mailing us at general@collegeofnaturopaths.on.ca.

SUMMARY FINANCIAL STATEMENTS

Report on the Audit of the Financial Statements

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, 2022, and the statements of changes in net assets, operations, 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, 2022, 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.

Basis for Opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the

Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of The College of Naturopaths of Ontario in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

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.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud

may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the College's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the College's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the College to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

KRIENS-LAROSE, LLP

Chartered Professional Accountants Licensed Public Accountants

Toronto, Ontario July 27, 2022

SUMMARY STATEMENT OF FINANCIAL POSITION

AS AT MARCH 31, 2022

	2022 \$	2021 \$
ASSETS		
Current		
Cash and cash equivalent (Note 2)	4,047,922	3,824,614
Accounts receivable	1,053,444	880,624
Prepaid expenses	111,343	121,269
	5,212,709	4,826,507
Equipment (Note 3)	33,307	41,279
	5,246,016	4,867,786
LIABILITIES		
Current		
Accounts payable and accrued liabilities	297,921	220,915
Deferred revenue (Note 4)	2,753,297	2,550,449
HST payable	289,392	275,938
	3,340,610	3,047,302
NET ASSETS (NOTE 5)		
Unrestricted net assets	(332,717)	(394,094)
Patient Relations	100,000	89,193
Business Continuity	1,083,877	1,075,385
Investigations & Hearings	1,004,246	1,000,000
Succession Planning	50,000	50,000
	1,905,406	1,820,484
	5,246,016	4,867,786

SUMMARY STATEMENT OF OPERATIONS AND CHANGES IN NET ASSETS

FOR THE YEAR ENDED MARCH 31, 2022

	2022	2021
	\$	\$
REVENUES		
Registration and member renewal fees	2,715,625	1,564,176
Examination fees	258,030	164,225
Government assistance (Note 6)	129,081	443,313
Inspection and hearing fees	84,900	51,250
Incorporation fees	32,312	24,112
Investment Income	(1,390)	7,001
Total Revenues	3,218,558	2,254,077
EXPENSES		
Salaries and benefits	1,707,383	1,597,738
Rent and utilities	285,550	284,540
Exam fees and expenses	201,284	212,865
Consulting fees		
Consultants - Complaints and inquiries	136,686	117,171
Consultants - General	58,038	152,062
Consultants - Assessors/inspectors	27,839	10,256
Legal fees		
Legal fees - Discipline	91,450	121,428
Legal fees - Complaints	58,444	40,415
Legal fees - General	24,646	37,366
Council fees and expenses	143,089	78,668
Office and general	114,103	85,609
Public education	54,270	91,462
License	53,923	45,006
Equipment maintenance	50,568	40,716
Insurance	28,480	27,533
Discipline & FTP Committee	21,439	20,667
Translation	16,539	48,949
Audit fees	15,871	16,000
Amortization	15,256	16,102
Patient relations fund expenses allocation	10,806	511
Education and training	9,247	6,134
Travel accommodation & meals	5,334	2,452
Printing and postage	1,896	1,946
Patient relations Committee	984	378
Website	511	10,093
Total Expenses	3,133,636	3,066,067
Excess (Deficiency) Of Revenues Over Expenses For The Year	84,922	(811,990)
Net Assets, Beginning Of Year	1,820,484	2,632,474
Net Assets, End Of Year	1,905,406	1,820,484

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 Registrants 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.

To ensure the integrity of our regulatory processes and to enhance the safety and security of our volunteers, we no longer identify any of our volunteers by name, except

those elected or appointed to the Council. Although we do not name them individually, the fact is that the College could not complete the work that is necessary without the support of our many volunteers.

To all our volunteers, on behalf of the Council and the staff, we express our most sincere and heartfelt thanks for the many hours of work you put in reviewing materials, attending meetings, conducting examinations and assessments and providing feedback to the College.

COLLEGE COMMITTEES

Our governing Council is supported by two types of committees: statutory and non-statutory. These committees are made up of naturopaths, public members who serve on Council as well as Registrants of the profession and Public Representatives 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 statute, namely the Regulated Health Professions Act, 1991. These Committees include:

- Discipline Committee (DC)
- Executive Committee (EC)
- Fitness to Practise Committee (FTP)
- Inquiries Complaints and Reports Committee (ICRC)
- Patient Relations Committee (PRC)
- Quality Assurance Committee (QAC)
- Registration Committee (RC)

Statutory Committee reports from the fiscal year are **available on our website**.

Non-statutory Committees

These committees are not required by law but are created and delegated authority by the Council to perform specific functions. Non-statutory Committees include:

- Audit Committee (AC)
- Examination Appeals Committee (EAC)
- Equity, Diversity and Inclusion Committee (EDIC)
- Governance Committee (GC)
- Governance Policy Review Committee (GPRC)
- Inspection Committee (IC)
- Scheduled Substances Review Committee (SSRC)
- Standards Committee (SC)



The College is not a school or educational facility. It is a regulatory authority that exists to protect the public and patients' rights to safe, competent and ethical naturopathic care.



The College of Naturopaths of Ontario

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