

# 2022/23 Annual Report

April 1, 2022, to March 31, 2023



College of Naturopaths of Ontario

Protecting the public. Supporting safe practice.







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## 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.

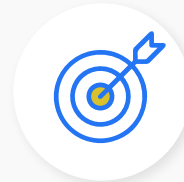
### 4 Key functions of regulation

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.



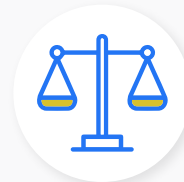
#### 2. Setting Standards

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.

## 2022–2023 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. Jordan Sokoloski, ND**, Council Chair

**Sarah Griffiths-Savolaine**, Council Vice-Chair\*

**Dr. Shelley Burns, ND**, Officer-at-Large

**Dean Catherwood**, Officer-at-Large\*

**Dr. George Tardik, ND**, Officer-at-Large

#### Council members

**Asifa Baig\***

**Dr. Jonathan Beatty, ND**

**Brook Dyson\***

**Lisa Fenton\***

**Dr. Anna Graczyk, ND**

**Tiffany Lloyd\***

**Dr. Denis Marier, ND**

**Paul Phillion\***

**Dr. Jacob Scheer, ND**

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

# Staff of the College<sup>1</sup>

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

**Andrew Parr, CAE** – Chief Executive Officer (CEO)

**Jeremy Quesnelle** – Deputy CEO

## Operations

**Agnes Kupny**, Director of Operations

**Thussyanthi Pirabakaran**, Finance Coordinator

**Monika Zingaro**, Human Resources and Administration Coordinator

## Registration and Examinations

**Erica Laugalys**, Director, Registration and Examinations

**Maryam Katozian**, Acting Manager, Registration

## Registration Coordinator

**Sahrish Ali**, Manager, Registrations (Leave of Absence)

**Marita Dias**, Entry-to-Practise Coordinator

**Tuyen Le**, Amend to Senior Coordinator, Examinations (Leave of Absence)

**Anum Jamal**, Examinations Coordinator

## Professional Conduct

**Natalia Vasilyeva**, Manager, Professional Conduct

**Rebecca McBride**, Coordinator, Professional Conduct

## Professional Practise

**Dr. Mary-Ellen McKenna, ND** (Retired)  
Manager, Professional Practice

**Daniella Daley**, Coordinator, Professional Practice

**Joseph Quao**, Administrative Assistant,  
Regulatory Programs

## Communications

**Ian D'Costa**, Senior Communications Officer

**Yun Zhang John**, Marketing Communications Officer

**Charlotte Ribeiro Lopes**, Administrative Assistant,  
Communications

<sup>1</sup>As of March 31, 2022.

## Looking forward, the horizon is brimming with promise and possibilities.

On behalf of the Council and the staff of the College, I am pleased to present our 2022-2023 Annual Report. This report covers the period from April 1, 2022, to March 31, 2023. As we turn the page on our 7th year, I find myself contemplating the concept of progress. It is only in our response to progress, and our ability to steer its course, that we truly make a difference.

In reflecting on our 2022-2023 fiscal year, I can't help but feel a surge of pride and excitement for what lies ahead. In prioritizing progress as a cornerstone of our efforts in achieving our mission, this past year has exemplified the kind of transformative period that pushes us to explore new avenues, strengthening our commitment to protecting the public by ensuring patients' rights to safe, competent, and ethical naturopathic care.

First and foremost, our commitment to our mandate has driven us to embark on a strategic planning initiative in conjunction with key stakeholders. The result? A new strategic plan that will both fortify our efforts and pave the way for even greater accomplishments in the future. This plan was the final evolution in a concerted and exhaustive effort to analyze our current direction and outline changes that will help us in our mission to ensure the highest standards of naturopathic care for all.

Our In Conversation With townhall series has cemented itself, over the past year, as a leading force in fostering dialogue and strengthening relationships between the College and our Registrants. Our partnerships, including one with the Ministry of Health, have flourished as a result. I am thrilled to share that we have exciting plans to expand

this initiative in the coming months and years, creating more opportunities for collaboration and knowledge sharing.

Accessibility has always been a guiding principle for the College, and we have taken significant steps to make our resources within reach of everyone. Our website continues to undergo modifications and enhancements, with the goal of making it more user-friendly and informative. We want to ensure that accessing critical information is as seamless as possible, empowering both our profession and the public with the knowledge they need.

Among the many progressive changes, we've seen over the past year, this includes the relocation of our office in downtown Toronto to better serve the evolving needs of the College and the public. I know I speak on behalf of the entire College when I say that we are excited about the opportunities this new space presents and the positive impact it will have.

Looking forward, the horizon is brimming with promise and possibilities. We will continue to push boundaries, safeguard the public, and promote safe and competent practice. I invite every one of you to join us on this transformative journey as we embrace change, inspire innovation, and continue to meet our commitment to protecting the public by promoting safe practice through all that we do.

If you have any comments or questions, please reach out to me directly at [ceo@collegeofnaturopaths.on.ca](mailto:ceo@collegeofnaturopaths.on.ca).



**Andrew Parr, CAE**  
Chief Executive Officer

# 1. Registration & Examinations



## Registering Safe, Competent and Ethical Individuals

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 in English: “naturopath” or “naturopathic doctor”, or in French: “naturopathe” or “docteur en naturopathie”, 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.

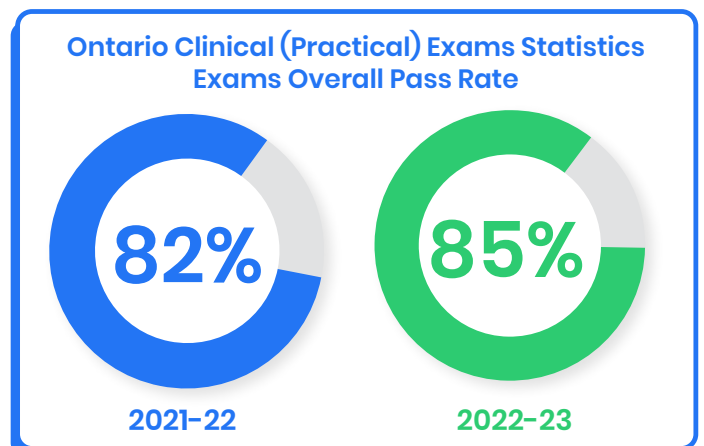
In addition, the College administers and maintains another set of voluntary exams that further protect the public. These exams ensure that naturopaths who include additional higher risk procedures in their practices are qualified to do so.

- The Ontario Prescribing & Therapeutics Exam is for NDs who want to prescribe, compound, dispense, and sell a drug, or administer a drug or substance by inhalation or injection.
- 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.

## Entry-to-Practise Examinations

The College administers four entry-to-practise Ontario-based exams; together, these four exams are used to







determine whether an individual has the knowledge, skill and judgement 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 emphasize 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 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).

Three sessions of the Ontario Clinical (Practical) Exams occurred in this reporting period: July 2022, October 2022 and February 2023. Examination capacity was capped at 42 candidates per exam session to maintain safety protocols. 2022 saw a positive trend upwards with a larger percentage of candidates successfully completing the examinations on their first attempt.

### Ontario Clinical (Practical) Exams Stats

	2021-22	2022-23
Candidates	136	130
Total passed	119	110
Breakdown of total passed	89 (1 <sup>st</sup> attempt) 29 (2 <sup>nd</sup> attempt) 1 (3 <sup>rd</sup> attempt)	94 (1 <sup>st</sup> attempt) 14 (2 <sup>nd</sup> attempt) 2 (3 <sup>rd</sup> attempt)
Failed*	25	20
Breakdown of modules failed	10 manipulation 13 acupuncture 4 physical exam	7 manipulation 11 acupuncture 7 physical exam

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

### Jurisprudence Exam Statistics

Enrolment and pass rates remained consistent with those reported in 2021-22, with candidates generally electing to complete the Jurisprudence Exam only once other entry-to-practise examinations were successfully completed.

**Total passed:**

**87**  
2021-22

**89**  
2022-23

# 1. Registration & Examinations

## Ontario Clinical Sciences and Ontario Biomedical Exams

The Ontario Clinical Sciences and Ontario Biomedical Examinations, which replaced the Naturopathic Physicians Licensing Examinations as entry-to-practise examinations for registration in Ontario in 2020 and 2021 respectively, 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 helped guide the development and continues to assist with the ongoing maintenance process and administration of both exams.

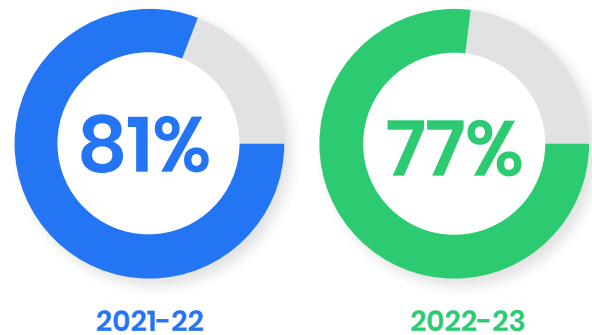
Exam pass marks are set through a psychometrically sound process called the “modified Angoff method”, which accounts for the difficulty of exam content and an established profile of what a naturopath can be expected to know and be able to do at entry-to-practise. For quality assurance purposes, three 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 2022 and March 2023.

Administration of the Ontario Biomedical examination is through a secure online exam delivery and proctoring platform, allowing candidates to sit the examination from a personal home computer or laptop. In-person administrations at a testing center location are made available on an as-needed basis for individuals unable to sit the examination online (e.g., due to a disability).

### Ontario Biomedical Exam Statistics Exams Overall Pass Rate:



### Biomedical Exam Statistics

	2021-22	2022-23
Candidates	98	132
Total passed	79	102
Breakdown to total passed	73 (1 <sup>st</sup> attempt) 6 (2 <sup>nd</sup> attempt)	86 (1 <sup>st</sup> attempt) 12 (2 <sup>nd</sup> attempt) 4 (3 <sup>rd</sup> attempt)
Failed*	19	30*

\*Three failed results were issued for exam violations, where the candidate was found to have contravened the Exam Rules of Conduct.

## Ontario Clinical Sciences Examination Statistics

Two sessions of the Ontario Clinical Sciences Examination occurred in this reporting period: August 2022 and February 2023.

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

Ontario Clinical Sciences Examination Statistics		
	2021-22	2022-23
Overall pass rate	70%	76%
Candidates	106	140
Total passed	74	106
Breakdown of total passed	58 (1st attempt) 16 (2nd attempt) 0 (3rd attempt)	86 (1st attempt) 16 (2nd attempt) 4 (3rd attempt)
Failed*	32	34

## 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-practice 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.

Four appeals were filed during this fiscal year, three of which were granted by the Committee, and one was declined.

## 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 the Registration Regulation to enter the profession, 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.

Initial Registration Statistics		
	2021-22	2022-23
Applications received	72	108
Certificates issued*	77	100

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

# 1. Registration & Examinations

## 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 deny issuance of a certificate of registration.

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 regulation
  - 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

	2021-22	2022-23
Applications received	15	4

### Registration Committee Outcomes

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

### Registration Committee Outcomes

	2021-22	2022-23
Applications received	7	3
Certificate issued after completing additional exams	0	0
Certificate issued with terms, conditions or limitations	2	0
Certificate issued after completing more education or training	6	1
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 36.

### Prior Learning Assessment and Recognition (PLAR) Program

As part of its regulatory requirements, the College also assesses individuals seeking registration to practise the profession in Ontario who have obtained their naturopathic training outside of the CNME-accredited programs. This multi-stage assessment process of an individual's knowledge and skills for 'substantial equivalency' to that of a CNME-accredited program graduate is the Prior Learning Assessment and Recognition (PLAR) program. PLAR is comprised of five assessment stages: Stage 1 (Paper-Based Assessment), Stage 2 (Biomedical Examination), Stage 3 (Clinical Sciences Examination), Stage 4 (Structured Interview) and Stage 5 (Interaction with a Standardized Patient). To be accepted for assessment in the PLAR program, individuals must have sufficient language proficiency, and have a minimum of a Canadian Bachelor's degree or equivalent in a healthcare discipline reasonably related to naturopathy.

In this reporting period, one PLAR applicant successfully completed Stage 2, and one PLAR applicant was assessed in Stage 1 and found to be substantially non-equivalent in their education and experience to allow them to move forward to Stage 2.



## 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 3.9% 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, 2023, 98% of Registrants had renewed their registration for the 2022 registration year, with submission of both their fee (or enrolment in the College's Payment Plan program) and the Information Return form.

	2021-22	2022-23
% renewed by March 31, 2021	98%	98%
# resignations	35	31
# revocations	8	7
# of reinstatements (lifted suspensions)	16	9

\*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)

	2021-22	2022-23
General Class (GC)	1,550	1,613
Inactive Class (IN)	168	171
Life Registrants	22	24
<b>TOTAL</b>	<b>1,740</b>	<b>1,808</b>

### Changes to Registrant Class

	2021-22	2022-23
Class Change GC- IN	1,550	1,613
Class Change IN-GC (under 2 years)	168	171

### 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.

	2021-22	2022-23
Class change	2	4
Life Registration	0	2

# 1. Registration & Examinations

## 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.

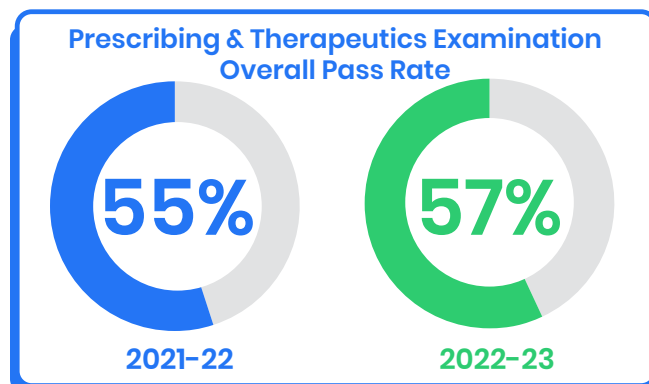
In both cases, naturopaths are required to successfully complete an education program approved by the Council of the College and an exam approved or administered by the College. These requirements provide an added layer of protection for the public by ensuring the naturopath can perform these high-risk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

## Prescribing and Therapeutics Examination

Naturopaths who wish to prescribe, dispense, compound, sell, or administer a drug or substance by inhalation or non-IVIT injection must meet the Standard of Practice for Prescribing, which entails successfully completing a College-approved course in therapeutic prescribing and the College's Ontario Prescribing and Therapeutics exam. This examination, which consists of a written component and an oral assessment component, 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*.

30 Registrants met the *Standard of Practice for Prescribing* in 2022–23. In total, 862 Registrants, or about 48% the profession, have passed the exam since its inception in June 2014.

Two sessions of the Ontario Prescribing and Therapeutics examination were offered in this reporting period, in April and September.



Prescribing & Therapeutics Examination Overall Pass Rate – Continued		
	2021-22	2022-23
Passed	46	36
Failed	37	27

2022-23 Prescribing Exam Failures by Component	
	2022-23
Written	15
Oral	5
Written & Oral	7

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 not only meet the [Standard of Practice for Prescribing](#) but must also meet the [Standard of Practice for Intravenous Infusion Therapy \(IVIT\)](#), which entails successfully completing a College-approved IVIT course and the College's Ontario IVIT Examination.

This examination, which consists of a multiple-choice exam component, a series of osmolarity calculations and a practical component, assesses a Registrant's knowledge and practical skill in compounding for and administering IVIT, in accordance with the General Regulation and its tables. Two sessions of the IVIT Examination were offered in this reporting period in May and December. To maintain safety measures, registration was capped at 20 candidates per exam session.

### Intravenous Infusion Therapy (IVIT) Examination

	2021-22	2022-23
Overall pass rate	53%	75%
Passed	20	30
Failed	18	10

### 2022-23 IVIT Exam Failures by Component

Osmolarity	4
Written MCQ*	4
Practical	0
Osm & MCQ**	1
Practical & MCQ	1
Practical & OSM	0

\* 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. This process includes both an application and evaluation process. Certificates of Authorization are renewed annually, this activity is overseen by the Registration and Examinations area of the College.

### Corporation Applications Data

	2021-22	2022-23
New applications	16	17
Approved	16	17
Denied	-	-
Closed for Incompleteness	-	-

As of March 31, 2022, the College had issued a total of 116 Certificates of Authorization for Naturopathic Professional Corporations.

	2021-22	2022-23
Renewals approved for existing corporations	88	99

### 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](#) contains 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.

## 2. Setting Standards

The second of the College's 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.

#### Number of Inquiries Received

2021-22	2022-23
803	624

The College's Regulatory Guidance program received approximately 27% less inquiries than in the previous year.

#### By Email

2021-22	2022-23
479	328

#### By Phone

2021-22	2022-23
324	296





In 2022–23, scope of practice and fees and billing were the issues most asked about. As issues surrounding COVID-19 have diminished so have the number of inquiries related to it. Newly added to the Top 10 list of inquiries includes Delegation and Referrals, Notifying Patients when moving, Privacy and Consent.

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.

Top 10 Topics		
	2021–22	2022-23
Scope of practice in Ontario	70	57
Fees and billing	27	50
Telepractice	49	42
Record Keeping & Transfer of Records	45	38
Patient visits	35	37
Inspection Program	17	37
Delegation and Referrals		29
Laboratory tests	52	26
Notifying Patient When Moving		21
Privacy and Consent		19
Advertising	21	18
COVID-19	91	17

### 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

- This fiscal year:
- The Committee reviewed 10 active standards of practice.
  - Public consultation on proposed amendments will be initiated in the next fiscal year.

	2021-22	2022-23
Standards reviewed	12	10
Standards amended	1	0

## 2. Setting Standards

### Standard & Guideline Review Statistics (Continued)

	2021-22	2022-23
Guidelines reviewed	1	-
Guidelines amended	1	-
Guidelines created	-	-

### 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 2 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		
	2021-22	2022-23
Existing premises 5 year	7	38
New premises – Part I	20	21
New premises – Part II	20	12

*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.

Type 1 Occurrences Reported	Number	
	2021-22	2022-23
Any referral of a patient to emergency services within the 5 days following the performance of a procedure at the premises.	11	15
The administration of an emergency drug to a patient immediately following an IVIT procedure.	0	1
The death of a patient that occurs within 5 days following the performance of a procedure at the premises.	2	2

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

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.

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

## 2. Setting Standards

### 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 178 premises performing IVIT procedures, of which 34 reported one or more Type 2 occurrence. For the March 2, 2022 – March 1, 2023, period, designated Registrants were asked 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 90,522 IV bags were compounded and 90,153 were administered. This equates to approximately a 14% increase in compounded IV bags and 16% increase in administration from 2021-22.

A total of 167 Type 2 occurrences were reported to have happened during 90,153 IVIT administrations. This is a 0.2% rate of Type 2 occurrences during the past reporting period.

Type 2 Occurrences Reported	Number Reported	
	March 2, 2021– March 1, 2022	March 2, 2022– March 1, 2023
Infections occurring in a patient in the premises after an IVIT procedure was performed at the premises.	1	1
Unscheduled treatments of a patient by a Registrant occurring within five days after an IVIT procedure was performed at the premises.	5	4
Adverse drug reactions occurring in a patient after an IVIT procedure was performed at the premises.	161	162

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 delivered 71 final outcomes (results).



## Inspection Outcomes

	2021-22 # of Premises	2022-23 # of Premises
Final outcome of a pass	27	47
Preliminary outcome of a pass with conditions and final outcome of a pass	13	23
Preliminary outcome of a pass with conditions and final outcome of a pass with conditions	1	2
Preliminary outcome of a pass with conditions, final outcome not delivered in the same fiscal year	3	3
Preliminary outcome of a fail and a final outcome of a pass	1	0

### 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 may 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 five. The Funding program provided \$9,895 during the reporting period and a total of \$36,984.80 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 initiated a review of the funding program with the possibility of granting funding extensions.

### 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 administer substances by inhalation or injection, 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 initiated a gap analysis related to the drugs, labs and diseases within the scope of practice of the profession.

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*. A finalized draft regulation was received from the Ministry and presented to the Council for review and approval.

### Equity Diversity and Inclusion

The Equity, Diversity and Inclusion Committee (EDIC) is a group of ND volunteers and public representatives, with a broad array of expertise and experience, tasked with developing policies, procedures and processes for ensuring equity, diversity and inclusivity in the College's work. During the reporting period the EDIC drafted an Equity, Diversity, Inclusion and Belonging (EDIB) statement for Council, an EDIB policy, amended the College's workplace harassment policy, and began the process of developing an EDI lens and tool to be used by College Committees in drafting and reviewing policies, procedures and processes.

# 3. 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.

The Program has three components:

**1. Self-Assessment**—This component helps naturopaths reflect on their skills with respect to the core competencies and standards of practice of the profession.

During the reporting year, the Quality Assurance Committee developed 10 online self-assessment questionnaires related to several standards of practice including: advertising, record keeping, conflict of interest, delegation, fees and billing, restricted titles and dual registration, informed consent, sexual abuse and boundaries, mandatory reporting and telepractice. Registrants were required to complete a total of three self-assessment questionnaires. This included one mandatory sexual abuse and boundaries self-assessment and two additional self-assessments of their choosing.

	2021-22	2022-23
# of Registrants required to complete the self-assessments by March 31, 2022 deadline	1551	1582
# of Registrants who completed the self-assessments by the deadline	1142 (73.6%)	1256 (79.4%)

The Self-Assessment completion percentage continues to increase year over year.

**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.

CE Reporting		
	2021-22	2022-23
# of Registrants required to report CE	491	488
% submitted CE logs by deadline	97.6%	98%
CE log extensions/ amendments granted	2 of 16 requests	1 of 9 requests

Although only one request was approved by the QAC in 2022-23, all individuals who submitted their log form by the deadline date but had missing credits, were granted an additional extension.

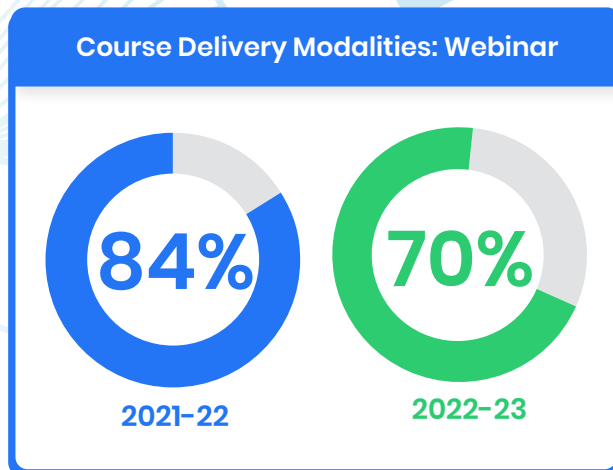


**Category A**—The College approves specific courses to be eligible for Category A Continuing Education (CE) credits. These courses are structured learning activities that address the core clinical competencies of the profession.

**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		
	2021-22	2022-23
Category A credit applications received	603	373
% approved	86.1%	91%

Approved Category A Courses by Category		
	2021-22	2022-23
Category A credit applications received	367	284
Prescribing/ Pharmacology	132	62
IVIT	12	11
Jurisprudence	8	11
Pharmacology & IVIT		4
Pharmacology & Jurisprudence		1



**Course Delivery Modalities: In-person+live**

	2021-22	2022-23
In-person/live	16%	30%

## 3. Quality Assurance

**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.

	2021-22	2022-23
Registrants randomly selected	50	100
Completed peer and practice assessments	44	92
Referred to the ICRC for non-compliance with the QA Program	1	-
Removed from the selection pool	5	8
<b>Reasons for removal from selection pool</b>		
Deferred	3	-
Changed class to Inactive	2	1
Returned to random selection pool		7
<b>Outcomes of completed peer and practice assessments</b>		
Demonstrated the knowledge, skill and judgment to meet the standards	42	83
Fell below the standards in at least one component of the assessment and were referred to the QA Committee	2	9
<b>Outcome for Registrants who fell below the standards</b>		
Registrant's submission to the QA Committee demonstrated deficiencies were adequately addressed and knowledge, skill and judgment is satisfactory.	1	9
Registrant's submission is pending	1	-

## 4. 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 Matters

	2021-22	2022-23
New complaints received	28	17
New CEO's inquiries initiated*	17	7
Matters closed	38	42

#### \*Origins of CEO's Inquiries

	2021-22	2022-23
Public inquiries	6	4
Matters reported by Registrants	2	0
Matters reported by other departments	3	2
Referral from ICRC to CEO	5	1
Referral from another regulator	1	0
Referral from the QA Committee	0	0



## 4. Professional Conduct

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 36.

	2021-22	2022-23
<b>TOTAL decisions</b>	<b>38</b>	<b>42</b>
No further action	6	10
Letter of advice/Counsel	14	10
Oral caution	13	2
Specified Continuing Education and Remediation Program (SCERP)	9	3
Oral Caution & Specified Continuing Education and Remediation Program (SCERP)		4
Letter of advice/counsel & Specified Continuing Education and Remediation Program (SCERP)		2
Acknowledgement & Undertaking	0	1
Referral to Fitness to Practise Committee	0	0
Referral to Discipline Committee	7	9
Frivolous and vexatious	0	0
Withdrawn – No further action		1

Types of Complaints/ CEO's Investigations Before the ICRC		
	2021-22	2022-23
Advertising	13	6
Inappropriate billing procedures	9	5
Inappropriate/unsatisfactory patient care	11	8
Practising outside their scope	8	8
Failure to comply with the Standard for IVIT/Injections	5	0
Sexual abuse, violation of professional boundaries		1
Failure to cooperate or comply with an order of Discipline Committee/ICRC	1	1
Practising while Inactive/ Suspended	1	2
Record keeping	5	3
Lab Testing	0	0
Delegation	0	1
Harassment	0	1
QA Program comply	0	1
Failure to cooperate	2	1
Unprofessional, unbecoming conduct	4	6

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		
	2021-22 # of days	2022-23 # of days
Average length	212	195
Shortest	64	8
Longest	846	373

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.

Costs for Matters Resolved by the ICRC		
	2021-22	2022-23
Average cost to the College	\$4,880.84	\$2,866
Highest cost	\$18,817.92	\$9,598
Lowest cost	\$150	\$150

### Costs for Matters Referred to the DC

	2022-23
Average cost to the College	\$7,983
Highest cost	\$30,540
Lowest cost	\$649

Note: In 2021/22 there was only one hearing held by the College. The total hearing cost was \$23,571.

### ICRC & Fitness to Practise

Incapacitated is defined in the *Regulated Health Professions Act, 1991* 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.

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 an 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.

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.

# 4. Professional Conduct

## Informing the Public

Information about upcoming discipline hearings can be found on the College's [website](#). Summaries of every discipline decision, and the reasons for them, are 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		
	2021-22	2022-23
Discipline hearings completed	1	7*
Findings of professional misconduct	1	7
Number of hearing days	1	9
Number of referrals from ICRC	4	9
Fitness to Practise hearings	-	0
Reinstatement hearings	-	0
Divisional court reviews	-	0

\*5 uncontested and 2 contested hearings.

## Discipline hearings completed: 7

### CoNO & Allan Bortnick

Uncontested hearing. The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: May 16, 2022

### CoNO & Helen Cohen

Contested Hearing. The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: November 4, 2022

### CoNO & Karim Dhanani

Uncontested Hearing (DC21-01). The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: November 8, 2022

Uncontested Hearing (DC22-02). The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: November 8, 2022

### CoNO & Richard Dodd

Contested Hearing. The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: December 5 & 20, 2022;  
February 14, 2023.

### CoNO & Kurt Stauffert

Uncontested Hearing. The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: October 11, 2022

### CoNO & Natasha Turner

Uncontested Hearing. The Panel of the Discipline Committee found that the Registrant had committed acts of professional misconduct.  
Hearing date: May 2, 2022

## 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 to have 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 & Allan Bortnick (CoNO file DC20-04)

- Legal costs and expenses: \$54,218
- Investigation costs: \$12,371
- Hearing costs: \$1,870

*Total cost to the College: \$68,459*

The Panel did not order the Registrant to pay the College's costs based on the undertaking to resign the Registrant's certificate of registration.

#### **CoNO & Helen Cohen (CoNO file DC22-03)**

- Legal costs and expenses: \$12,540
- Investigation costs: \$0
- Hearing costs: \$970

*Total cost to the College: \$13,510*

The Panel ordered the Registrant to pay the College's costs fixed in the amount of \$8,000, which amounted to 59% of the College's costs.

#### **CoNO & Richard Dodd (CoNO file DC22-01)**

- Legal costs and expenses: \$80,911
- Investigation costs: \$25,535
- Hearing costs: \$3,810

*Total cost to the College: \$110,256*

The Panel ordered the Registrant to pay the College's costs fixed in the amount of \$77,283.04, which amounted to 70% of the College's costs.

#### **CoNO & Karim Dhanani (CoNO file DC21-01)**

- Legal costs and expenses: \$42,255
- Investigation costs: \$9,849
- Hearing costs: \$610

*Total cost to the College: \$52,714*

The Panel ordered the Registrant to pay the College's costs fixed in the amount of \$11,000 which amounted to 21% of the College's costs.

#### **CoNO & Kurt Stauffert (CoNO file DC21-03)**

- Legal costs and expenses: \$48,015
- Investigation costs: \$10,030
- Hearing costs: \$1,697

*Total cost to the College: \$59,742*

The Panel ordered the Registrant to pay the College's costs fixed in the amount of \$7,500, which amounted to 13% of the College's costs.

#### **CoNO & Karim Dhanani (CoNO file DC22-02)**

- Legal costs and expenses: \$19,719
- Investigation costs: \$5,466
- Hearing costs: \$610

*Total cost to the College: \$25,795*

The Panel ordered the Registrant to pay the College's costs fixed in the amount of \$6,000 which amounted to 23% of the College's costs.

#### **CoNO & Natasha Turner (CoNO file DC21-02)**

- Legal costs and expenses: \$28,218
- Investigation costs: \$3,771
- Hearing costs: \$640

*Total cost to the College: \$32,629*

The Panel did not order the Registrant to pay the College's costs based on the undertaking to resign the Registrant's certificate of registration.

### **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](#).

# 4. Professional Conduct

Cease and Desist Letters Issued		
	2021-22	2022-23
Cease and desist letters issued	15	4
Injunctions-granted:	-	0

## Discipline Decisions Summary

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

### CoNO & Allan Bortnick (CoNO file DC20-04)

**Allan Bortnick (Resigned as of May 26, 2022)**  
**Registrant #: 0485 Hearing date: May 16, 2022**  
[Decision and Reasons DC20-04](#)

#### Summary of Allegations:

- Failing to maintain adequate records in accordance with the Board of Directors of Drugless Therapy – Naturopathy policy.
- Sexual impropriety with a patient.
- Conduct or an act relevant to the practice of naturopathic medicine that, having regard to all the circumstances, would reasonably be regarded by naturopathic doctors as unprofessional or incompetent.
- Failing to obtain informed consent for diagnostic or treatment procedures or plan of treatment.
- Contravening the standards of practice or guidelines of practice set by the Board of Directors of Drugless Therapy – Naturopathy.

The Agreed Statement of Facts had been agreed upon prior to 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.

On the same date that the Registrant signed the Joint Submission, the Registrant entered into two undertakings: an Undertaking to Resign and Never Reapply, and an Acknowledgment and Undertaking regarding an oral caution.

## Order

### The Discipline Panel imposed an order:

1. Directing the CEO to suspend the Registrant's certificate of registration for a period of twelve months.

The Panel concluded that the proposed penalty, in light of the Registrant's entry into the Undertaking to Resign and Never Reapply, and the Oral Caution Undertaking, was reasonable and in the public interest, and that it satisfied the principle of public protection.

### CoNO & Helen Cohen (CoNO file DC22-03)

**Helen Cohen (Revoked as of November 4, 2022)**  
**Registrant #: 0709**  
**Hearing date: November 4, 2022**  
[Decision and Reasons DC22-03](#)

#### Summary of Allegations:

- Failing to comply with an order of a panel of the College, specifically, orders of the Discipline Committee for two prior matters.
- Failing to carry out or abide by an undertaking given to the College or breaching an agreement with the College.
- 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.



### Admission of Professional Misconduct

The Registrant did not appear at the hearing despite having received notice. The Panel was satisfied that the Registrant received sufficient notice and directed that the hearing proceed in their absence. As the Registrant did not appear and was not represented by counsel, and made no submissions, they were deemed to contest the allegations of misconduct.

### Order

#### The Discipline Panel imposed an order:

1. Requiring the Registrant to appear before the panel to be reprimanded at a date to be set by the Chief Executive Officer.
2. Directing the Chief Executive Officer to revoke the Registrant's certificate of registration immediately following the hearing.
3. Requiring the Registrant shall pay the College's costs fixed in the amount of \$8,000.00 payable within 30 days of the hearing.

Due to the Registrant's ungovernability, the Panel found that revocation was the only penalty that protected the public and achieved both general and specific deterrence.

#### CoNO & Karim Dhanani (CoNO file DC21-01)

**Karim Dhanani (Suspended as of December 10, 2022)**  
**Registrant #: 1048 Hearing date: November 8, 2022**  
[Decision and Reasons DC21-01](#)

#### Summary of Allegations:

- Administering and offering services, treatments and testing outside of the Registrant's scope of practice; specifically, related to the treatment of patients with IVIT and for cancer.
- Ordering specimens to be sent and/or sending specimens to laboratories not licensed by the *Laboratory and Specimen Collection Centre Licensing Act* and requisitioning the collection of specimens for tests that are outside the scope of a naturopath.
- Practising the profession while the Registrant's certificate of registration has been suspended.

- Permitting to be posted on their, the Registrant's website, statements which related to treatments outside their scope, claimed superiority over other naturopathic clinics or treatment modalities, and advertised results or success stories which could not be verified.
- 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.
- Engaging in conduct that would reasonably be regarded by Registrants as conduct unbecoming a Registrant of the profession.

The Agreed Statement of Facts had been agreed upon prior to 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 imposed an order:

1. Requiring the Registrant to appear before the Panel to be reprimanded following the hearing of this matter.
2. Directing the Chief Executive Officer to suspend the Registrant's certificate of registration for a period of fourteen (14) months, to commence December 10, 2022, six (6) months of which shall be remitted if the Registrant complies with the provisions of paragraphs 3(a) through 3(e) no later than August 9, 2023.
3. Directing the Chief Executive Officer to impose the following specified terms, conditions and limitations on the Registrant's certificate of registration, all of which shall be at the expense of the Registrant, to the satisfaction of the Chief Executive Officer, prior to February 29, 2024:
  - a. Requiring that the Registrant unconditionally pass the PROBE ethics course

## 4. Professional Conduct

- b. Requiring that the Registrant successfully complete the College's Jurisprudence course
- c. Requiring that the Registrant review the following:
  - i. All standards of practice (as set out in the General Regulation and issued by the College) that were determined to have been contravened
  - ii. Any and all College guidelines related to the above noted standards of practice
  - iii. Professional Misconduct Regulation, and
  - iv. College Program requirements for registered intravenous infusion therapy premises
- d. Requiring that the Registrant meet with a Regulatory Expert selected by the College a minimum of five (5) and a maximum of seven (7) times, at the discretion of the Regulatory Expert, to discuss the Registrant's completion of paragraphs 3(a) through (c) and the Decision and Reasons of the Discipline Committee
  - i. The Registrant shall undertake to have the Regulatory Expert deliver a report to the Chief Executive Officer, that is deemed to be satisfactory to the Chief Executive Officer, setting out the Regulatory Expert's opinion as to whether the Registrant has developed insight into the Discipline Committee's findings and whether the Registrant will incorporate the learnings of paragraphs 3(a) through (c) into his practice, within one month of the final meeting or at any other time that the Regulatory Expert feels is appropriate
- e. Requiring that the Registrant prepare an essay, to the satisfaction of the Chief Executive Officer, that sets out what the Registrant has learned from paragraphs 3(a) through 3(d) above and how he has and/or will implement his learnings into practice, and
- f. Requiring the continuation of the terms of the interim order dated October 18, 2020 until such time as the Registrant meets the standards of prescribing and intravenous infusion therapy.
4. Requiring the Registrant to pay a fine of \$500 to the Minister of Finance, within two (2) months of the date of the hearing of this matter.
5. Requiring the Registrant to pay the College's costs fixed in the amount of \$11,000 on a schedule to be set by the Chief Executive Officer.

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

### CoNO & Karim Dhanani (CoNO file DC22-02)

**Karim Dhanani (Suspended as of December 10, 2022)**

**Registrant #: 1048**

**Hearing date: November 8, 2022**

[Decision and Reasons DC22-02](#)

### Summary of Allegations:

- Failing to co-operate fully with Investigators.
- Performing unauthorized controlled acts, specifically, administering substances by inhalation and/or prescribing Vitamin D to their patients over 1,000 IU.
- Failure to obtain informed consent from their patients when they administered inhalation therapy or prescribed Vitamin D over 1,000 IU as they failed to advise patients that they were not authorized to engage in such acts.
- Posting or permitting the posting on the Clinic website that they were authorized to administer substances by inhalation.
- Failing to keep records in accordance with the standards of the profession.
- 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.
- Engaging in conduct that would reasonably be regarded by Registrants as conduct unbecoming a Registrant of the profession.

The Agreed Statement of Facts had been agreed upon prior to 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 imposed an order:

1. Requiring the Registrant to appear before the Panel to be reprimanded following the hearing of this matter.
2. Directing the Chief Executive Officer to suspend the Registrant's certificate of registration for a period of twelve (12) months, to commence December 10, 2022, four (4) months of which shall be remitted if the Registrant complies with the provisions of paragraphs 3(a) through 3(d) no later than August 9, 2023.
3. Directing the Chief Executive Officer to impose the following specified terms, conditions and limitations on the Registrant's certificate of registration, all of which shall be at the expense of the Registrant, to the satisfaction of the Chief Executive Officer, prior to February 29, 2024:
  - a. Requiring that the Registrant unconditionally pass the PROBE ethics course, and,
  - b. Requiring that the Registrant review the following resources, including:
    - i. Standard of Practice on Advertising
    - ii. Guideline for Advertising
    - iii. Professional Misconduct Regulation
    - iv. Advertising Do's and Don'ts, and
    - v. Social Media Tips
  - c. Requiring that the Registrant meet with a Regulatory Expert selected by the College a minimum of one (1) and a maximum of three (3) times, at the discretion of the Regulatory Expert, to discuss the Registrant's completion of paragraphs 3(a) and (b) and the Decision and Reasons of the Discipline Committee
    - i. The Registrant shall undertake to have the Regulatory Expert deliver a report to the Chief Executive Officer, that is deemed to be satisfactory to the Chief Executive Officer, setting out the Regulatory Expert's opinion as

to whether the Registrant has developed insight into the Discipline Committee's findings and whether the Registrant will incorporate the learnings of paragraphs 3(a) and (b) into his practice, within one month of the final meeting or at any other time that the Regulatory Expert feels is appropriate.

- d. Requiring that the Registrant prepare an essay, to the satisfaction of the Chief Executive Officer, that sets out what the Registrant has learned from items 3(a) through 3(c) above and how he has and/or will implement his learnings into practice.
4. Requiring the Registrant to pay a fine of \$500 to the Minister of Finance, within two (2) months of the date of the hearing of this matter.
5. Requiring the Registrant to pay the College's costs fixed in the amount of \$6,000 on a schedule to be set by the Chief Executive Officer.

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

### CoNO & Richard Dodd (CoNO file DC22-01)

#### Richard Dodd (Revoked as of Feb 14, 2023)

Registrant #: 0768

Hearing dates: December 5, 20, 2022; February 14, 2023

[Decision and Reasons DC22-01](#)

### Summary of Allegations:

- Providing or attempting to provide services or treatment that the Registrant knows or ought to know to be beyond the Registrant's knowledge, skill or judgment, specifically:
  - they offered and administered IVIT to patients in their clinic, when they were not authorized to administer IVIT and the Clinic was not registered to provide such services.
  - they administered unauthorized substances by injection, provided cancer treatment and provided ultraviolet irradiation.
  - they held themselves out as a health professional that could provide opinion on the exemption status for the COVID-19 vaccination, despite knowing that this was outside of their scope as a naturopath.

# 4. Professional Conduct

- Failing to advise a patient or the patient's authorized representative to consult another member of a health profession within the meaning of the *Regulated Health Professions Act, 1991*.
- Performing a controlled act that the Registrant is not authorized to perform.
- Permitting the advertising of the Registrant or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable.
- Signing or issuing, in his or her professional capacity, a document that the Registrant knows or ought to know contains a false or misleading statement, specifically, two COVID-19 exemption letters.
- Contravening, by act or omission, a term, condition or limitation on the Registrant's certificate of registration
- Failing to comply with an order of a panel of the College, in particular, an interim order of the Inquiries, Complaints and Reports Committee.
- Failing to reply appropriately and within 30 days to a written inquiry or request from the College.
- 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.
- Engaging in conduct that would reasonably be regarded by Registrants as conduct unbecoming a Registrant of the profession.

## Admission of Professional Misconduct

The Registrant did not appear at the hearing despite having received notice. The Panel was satisfied that the Registrant received sufficient notice and directed that the hearing proceed in their absence. As the Registrant did not appear and was not represented by counsel, and made no submissions, they were deemed to contest the allegations of misconduct.

## Order

### The Discipline Panel imposed an order:

1. Directing the Chief Executive Officer to revoke the Registrant's certificate of registration immediately following the hearing.
2. Requiring the Registrant shall pay the College's costs fixed in the amount of \$77,283.04, payable within 30 days of the order.

The Panel accepted the proposed order, finding it to be in the public interest, proportionate to the misconduct and consistent with previous orders of discipline committees of health colleges involving similar conduct.

## CoNO & Kurt Stauffert (CoNO file DC21-03)

### Kurt Heinrich Stauffert

(Resigned as of December 6, 2022)

Registrant #: 1223 Hearing date: October 11, 2022

[Decision and Reasons DC21-03](#)

## Summary of Allegations:

- Practising outside the scope of a naturopath, in particular, the treatment of cancer.
- Failing to maintain a complete record for the Patient and falsifying the Patient's records in the face of a College investigation into their conduct.
- Failing to obtain consent for all treatments of the Patient.
- Failing to foster an appropriate therapeutic relationship with the Patient in a transparent and patient-centred manner.
- Failing to formulate a naturopathic diagnosis, develop and maintain relationships with other healthcare professionals in the care of the Patient, and effectively communicate with the Patient.
- 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.
- Engaging in conduct that would reasonably be regarded by Registrants as conduct unbecoming a Registrant of the profession.

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

## Finding 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.

On the same date that the Registrant signed the Joint Submission, the Registrant entered into two undertakings: an Acknowledgment and Undertaking, and an Acknowledgment and Undertaking - Resignation.

### Order

The Discipline Panel imposed an order requiring the Registrant:

1. To appear before the Panel to be reprimanded immediately following the hearing of this matter
2. To pay a fine of not more than \$350 by cheque made out to the Minister of Finance, and to be mailed to the College, within one month of the date of this order, and
3. To pay the College's costs fixed in the amount of \$7,500 payable within one month of the date of this hearing of this matter.

The Panel concluded that the proposed penalty, in light of the Registrant's entry into the Undertaking to resign, was reasonable and in the public interest, and that it satisfied the principle of public protection.

### CoNO & Natasha Turner (CoNO file DC21-02)

**Natasha Turner (Resigned as of May 10, 2022)**

**Registrant #: 0894 Hearing date: May 2, 2022**

[Decision and Reasons DC21-02](#)

### Summary of Allegations:

- Prescribing, dispensing, compounding or selling a drug or a substance for an improper purpose, specifically:
  - they recommended, prescribed and sold Vitamin D to their patients in excess of 1,000 International Units ("IU") without authorization, and
  - they recommended and sold Vitamin D to the public via the Clinic website in excess of 1000 IU without authorization.
- Offering and/or selling and/or recommending non-

scheduled products and/or services and/or drugs to the public on the Clinic website and not within the context of a Registrant-patient relationship and/or without conducting an assessment.

- Permitting the advertising of the Registrant or his or her practice in a manner that is false or misleading or that includes statements that are not factual and verifiable.
- Charging block fees and permitting the issuance of inaccurate and misleading naturopathic receipts in their name and in the name of the Clinic.
- 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.
- Engaging in conduct that would reasonably be regarded by Registrants as conduct unbecoming a Registrant of the profession.

The Agreed Statement of Facts had been agreed upon prior to 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. On the same date that the Registrant signed the Joint Submission, the Registrant entered into an Acknowledgment and Undertaking to resign and never reapply for registration with the College.

### Order

**The Discipline Panel imposed an order:**

1. Requiring the Registrant to appear before the panel to be reprimanded 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 twelve (12) months with six (6) months remitted, to commence on the date of the hearing of this matter.
3. 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.

The Panel concluded that the proposed penalty, in light of the Registrant's entry into the Undertaking to resign, 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 Ministry of Health, on behalf of the Minister, interacts with the College in three important ways. First, the College annual submits data about the naturopathic profession in Ontario to the Health Professions Database. This system tracks the number and location of Ontario health professions to provide overall health workforce planning efforts.

The second interaction with the Ministry is in relation to the Public members appointed to the Council. The Minister, with the support of the Ministry and upon approval of the Lieutenant Governor in Council is responsible for appointing public representatives to the Council of the College.

In the 2022-23 reporting period:

There were no new appointments necessary as the Council has a full complement Public members; however, in January 2023 Mr. Dean Catherwood of Toronto was reappointed for a three-year term and in March 2023 Ms. Asifa Baig of Mississauga submitted her resignation to the Minister for personal reasons. This leaves a vacancy to be filled in the next program year.

Finally, the Ministry of Health provides oversight to the College to ensure that it performs its obligations under the legislation and in the public interest. Although the Colleges engage in dialogue with the Ministry regularly, the primary vehicle for oversight is through the College Performance Measurement Framework (CPMF).

In March 2023, the College submitted its third annual CPMF report to the Ministry for review and feedback. As is expected, the Colleges reports are [publicly available on our website](#).

## 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, Complains 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.

	2021-22	2022-23
Decisions appealed	0	0
Outcome(s)	0	0



# College of Naturopaths of Ontario

## 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.

	2021-22	2022-23
Appealable ICRC decisions	14	23
Decisions appealed	0	2
Outcomes	1*	0

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

## Office of the Fairness Commissioner of Ontario (OFC)

The OFC oversees the registration practices of the health regulatory colleges and other regulators to ensure that they are fair, objective, impartial and transparent. While no specific actions were required of the College in 2022, outside of the annual filing of the Fair Registration Practices Report, the College continued to update its policies and procedures to align with best practices.

## 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 matter (e.g., did not provide notice of a complaint, made a decision while in a conflict of interest), they may seek a judicial review before the Divisional Court.

However, 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 Through our Leading Townhall Series: *In Conversation With*

Increasing the College's external engagement is an important part of the Communications team's overall mission. To that end, we deliver our leading townhall-format series, *In Conversation With*, providing 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 by interacting directly with members of the College and other key stakeholders directly in a moderated virtual townhall session. To date, the College continues to lead all other healthcare regulatory bodies with this series and will be including new panelists, more relevant topics of discussion and learning over the next year.

## Meeting our Accessibility Goals by Upgrading our Website

The College has consistently prioritized accessibility as a cornerstone of its communications programs. To that end, the Communications team maintains a plan of continuous improvement for the College website, reviewing, revising, and revamping pages, layouts, and functionality to meet these goals. Of note is the addition of the AccessiBe plugin, allowing for enhanced functionality for users requiring assistance with accessibility. This plugin was selected after working in close tandem with the Operations department in order to determine the best accessibility-based resource for the website. Further changes to the home page and the rest of the website are planned for the 2023-2024 year.



## Maintaining a Fully Bilingual Digital Presence

In 2021-2022, we identified an online bilingual presence as a critical priority for College communications, allowing us to reach more Ontarians and maintain compliance with the *Official Languages Act*. Over the past year, we have continued to pursue this priority in collaboration with our external translation partners that has seen the full translation of the entire College website's forward-facing pages, news articles, blog posts, as well as the implementation of an internal translation program to ensure updates and new verbiage published on the College's website is accordingly translated.



### Supporting 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
- Managing the College’s social media channels
- Directing and maintaining the College’s outbound channels, including the *In Conversation With* series.
- Registration renewal
- Volunteer recruitment

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<https://www.collegeofnaturopaths.on.ca>

299,368

unique pageviews

Top 3:

“Home Page”, “Prescribing Exam”,  
“Apply for Registration”

### Digital communications

Readership rates well above the industry norm.



**12 iNformedD**  
newsletters distributed  
with an 80.14% open rate



**Blog Posts:**  
14 English-language,  
4 French-language



**408 LinkedIn**  
**followers** with 1296  
impressions



**News Articles:**  
22 English Language,  
9 French-language



**Resources:**  
70 new resources  
added



**E-mails distributed:**  
41,599 total with a  
79.84% open rate



# Note to Summary Financial Statements

The College is including an abridged version of the Audited Financial Statements for the period April 1, 2022, to March 31, 2023, 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; 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](mailto: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, 2023, 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, 2023, 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.

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 26, 2023

# Summary Statement of Financial Position

AS AT MARCH 31, 2023	2023 \$	2022 \$
<b>Assets</b>		
<b>Current</b>		
Cash and cash equivalent (Note 2)	3,948,678	4,047,922
Accounts receivable	1,390,840	1,053,444
Prepaid expenses	131,369	111,343
	<hr/>	<hr/>
	5,470,887	5,212,709
<b>Equipment (note 3)</b>	40,506	33,307
	<hr/>	<hr/>
	5,511,393	5,246,016
	<hr/>	<hr/>
<b>Liabilities</b>		
Accounts payable and accrued liabilities	314,630	297,921
Deferred revenue (Note 4)	2,985,053	2,753,297
HST payable	315,358	289,392
	<hr/>	<hr/>
	3,615,041	3,340,610
	<hr/>	<hr/>
<b>Net assets (note 5)</b>		
Unrestricted net assets	(332,156)	(332,717)
Patient Relations	90,385	100,000
Business Continuity	1,083,877	1,083,877
Investigations & Hearings	1,004,246	1,004,246
Succession Planning	50,000	50,000
	<hr/>	<hr/>
	1,896,352	1,905,406
	<hr/>	<hr/>
	5,511,393	5,246,016
	<hr/>	<hr/>

# Summary Statement of Operations and

## Changes in Net Assets

AS AT MARCH 31, 2023	2023 \$	2022 \$
<b>Revenues</b>		
Registration and member renewal fees		
Examination fees	2,879,081	2,715,625
Inspection and hearing fees	307,726	258,030
Investment Income	221,883	84,900
Incorporation fees	47,039	(1,390)
Misc Income	30,900	32,312
Government assistance (Note 6)	1,363	-
	-	129,081
<b>Total Revenues</b>	<b>3,487,992</b>	<b>3,218,558</b>
<b>Expenses</b>		
Salaries and benefits	1,880,527	1,707,383
Rent and utilities	262,952	285,550
Exam fees and expenses	250,552	201,284
Consulting fees		
Consultants - Complaints and inquiries	105,719	136,686
Consultants - General	96,460	58,038
Consultants - Assessors/inspectors	45,312	27,839
Legal fees		
Legal fees - Discipline	190,650	91,450
Legal fees - Complaints	73,955	58,444
Legal fees - General	15,683	24,646
Council fees and expenses	152,814	143,089
Office and general	90,116	114,103
Public education	64,952	54,270
License	53,657	53,923
Equipment maintenance	49,793	50,568
Translation	42,260	16,539
Insurance	32,682	28,480
Amortization	21,425	15,256
Audit fees	16,394	15,871
Discipline & FTP Committee	13,779	21,439
Patient relations fund expenses allocation	9,615	10,806
Travel accommodation & meals	8,484	5,334
Education and training	7,775	9,247
Loss on disposal of furniture	4,216	-
Website	3,565	511
Printing and postage	2,680	1,896
Patient relations Committee	1,029	984
<b>Total Expenses</b>	<b>3,497,046</b>	<b>3,133,636</b>
<b>Excess (deficiency) of revenues over Expenses for the year</b>	<b>(9,054)</b>	<b>84,922</b>



## Thank you Volunteers

Did you know that volunteers contribute over 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, operational committee/working group members, 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, 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)

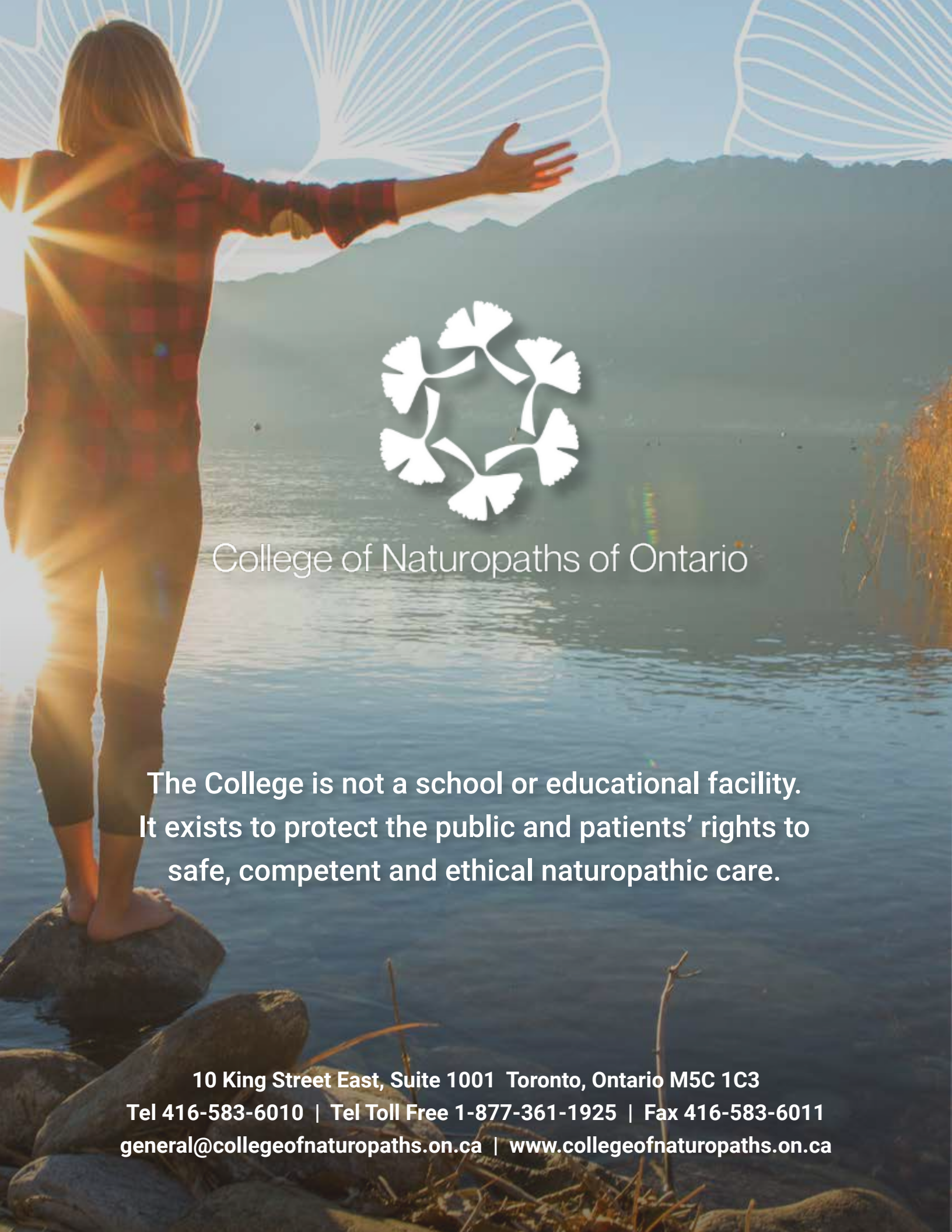
Statutory Committee reports from the fiscal year are [available on our website](#).

## 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
- Governance Policy Review Committee
- Inspection Committee (IC)
- Scheduled Substances Review Committee (SSRC)
- Standards Committee





## College of Naturopaths of Ontario

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

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