

College of NATUROPATHS of Ontario

2024 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

Under section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2024.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

2. Organization information

Organization name	College of NATUROPATHS of Ontario
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3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of NATUROPATHS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Naturopath
Academic requirement	Accredited Stream: Successful completion of a 4-year (or 2-year abridged International Medical Graduates) program in naturopathy accredited by the Council on Naturopathic Medical Education (CNME). Non-Accredited Stream: A minimum of a Canadian baccalaureate (or equivalent) in a health-care discipline reasonably related to naturopathy, along with successful completion of the College's Prior

	Learning Assessment & Recognition (PLAR) program.
Experience requirement	None for registration.
Language requirement	<p>Applicants must demonstrate fluency in English or French by providing the following:</p> <ul style="list-style-type: none"> • a signed declaration with the College which attests that they can comprehend, and communicate fluently (both written and orally) in English or French; and • a Letter of Standing supporting naturopathic registration in another regulated Canadian jurisdiction; or • an academic transcript noting successful completion of a CNME-accredited program in naturopathy; or • a Letter or transcript from the program in which their formal education pursuant to section 5(1) of the College's Registration Regulation, and in accordance with the College's PLAR Program Policy, was obtained which confirms their education was provided in either English or French; or • test results sent directly from the testing organization no more than two years from test completion, which demonstrates the applicant's successful completion of a College-recognized language test that is equivalent to a level 8 for all skills based on the Canadian Language Benchmarks (CLB).
Additional information on licensing requirements (may include links to appropriate page on regulator website):	<ul style="list-style-type: none"> • The completion of requisite entry to practise examinations (required exams will vary depending on the type of application, e.g., labour mobility vs a CNME-accredited program graduate) • The completion of the College's 3-step

	application process with provision of required documentation (i.e., CPR certificate, Criminal Records Check, and Professional Liability Insurance certificate at minimum) and information (e.g., past or current registrations held with other regulatory authorities, educational information, good character/past conduct information and declarations).

4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
Educational Testing Service Canada Inc.	Other
International Credentials Assessment Service of Canada	Academic credential evaluation
French Ministry of Education	Other
French Institute Alliance Francais	Other
World Education Services	Academic credential evaluation
British Council Canada	Other
Prometric	Other
International Qualifications Assessment Service	Academic credential evaluation
Comparative Education Service	Academic credential evaluation

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of NATUROPATHS of Ontario takes the following measure(s) to ensure fair and timely assessments:

Memorandums of Understanding have been established with credential assessment agencies and language skills testing agencies (see those noted as other above), where possible. Credential assessment is required only for PLAR applicants who completed their formal education outside of Canada and is not part of the College's registration process. Results of a formal language test are required only when language proficiency cannot be demonstrated through other means and documents, as set out in the College's Language Proficiency Policy. Due to the infrequent need for credential assessment or a language test result, oversight mechanisms have not been required to date for ensuring fair and timely assessments from the above-noted third-party service providers

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1	The finalization of a national entry to practise competency profile (https://www.collegeofnaturopaths.on.ca/resource-library/etp-competency-profile/) through the Canadian Alliance of Naturopathic Regulatory Authorities (CANRA). This profile was adopted by the College as its Ontario entry to practise competency profile in August 2024.
2	Development of a national entry to practise practical examination through the Canadian Alliance of Naturopathic Regulatory Authorities (CANRA). Initial pilot testing of the examination is set for March 2025.
3	Completion of the College's Enterprise Risk Management Plan at the end of 2024. Launch of the College's Enterprise Risk Management Program is

	scheduled to occur in the summer of 2025 following approval of the Plan by the College's Risk Committee and Council.
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B. Risks and Mitigations

Risk	Mitigation Measure
Registration position vacancies due to staff leaves of absence (e.g., parental leaves).	Launch of a new HR plan and changes to the College's organizational structure in 2024 to provide additional staffing support.

6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of NATUROPATHS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	No	
New or consolidated class of certificates or licenses	No	
Assessment of qualifications, including competency-based assessments and examinations	No	

Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	No	
Changes to internal review or appeal process	No	
Access by applicants to their records	No	
Other	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	No	
Resources or training to support applicants to move through the licensing process	No	
Anti-racism and inclusion-based policies and practices	No	

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	No	
Accreditation of educational programs	No	
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	Development and implementation of an "Opening and Closing the Emergency Class" policy (https://www.collegeofnaturopaths.on.ca/resource-library/opening-and-closing-the-emergency-class-policy/) and a Supervision policy (https://www.collegeofnaturopaths.on.ca/resource-library/supervision-policy/), the latter to address registrants who are required to be supervised in their practise of the profession, which includes but is not limited to those holding an emergency class certificate of registration.
Technological or digital improvements	No	
Steps to address labour shortages	No	

in the profession or trade		
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7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator's membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? (Yes or No)
Members	No
Applicants	No

Additional description:

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B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes

Additional description:

The College collects birth year and gender, as required by the Ministry of Health via the Health Professions Database, all current and former names used (including nicknames and common names) at point of application for assessing good character and past conduct, and a colour, passport sized photo (submitted at point of initial registration and updated at regular intervals throughout the course of the registrant's registration with the College) which is displayed as part of a registrant's profile on the College's public register.

C. Languages of service provision

College of NATUROPATHS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Naturopath	1888

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	1710	3
Inactive (non-practising)	178	3
emergency class	0	0

Gender	Number of Members
Female	1576
Male	312
X (includes trans, non-binary, and two-spirit people)	0

Jurisdiction of Initial Training	Number of Members
Ontario	1860
Other provinces and territories	22
United States	6
Other International	0
Multiple Jurisdictions	0
Other/not collected	0

Country of Initial Training	Number of Members
Canada	1882
United States of America	6

Official language of preference	Number of Members
English	1888
French	0

Racial identity (optional)	Number of Members
Not collected	1888

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Naturopath	79

Gender	Number of Applicants
Female	73
Male	6
X (includes trans, non-binary, and two-spirit people)	0

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario	72	9
Other provinces and territories	5	2
United States	2	0
Other International	0	0
Multiple Jurisdictions	0	0

Country of Initial Training	Number of Applicants
Canada	77
United States of America	2

Official language of preference	Number of Applicants
English	79
French	0

Racial identity (optional)	Number of Applicants
Not collected	79

G. Data Notes

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H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2024. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	68	0	0
Other provinces and territories	3	0	0
United States	2	0	0
Other International	0	0	0
Multiple Jurisdictions	0	0	0

I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Full / General/ Independent Practice	80	2

J. Data Notes

Regarding application decisions, five of the 11 applications received between January 1- December 31, 2024, which were still "in progress" at the end of this reporting year, had decisions rendered but had not paid the registration fee for issuance of a certificate of registration. The number of certificates issued in the General class includes applications received outside of the January 1 - December 31, 2024, reporting year. The emergency class of registration was not open during this reporting period.

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	4	0
Other provinces and territories	1	0

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0
Other provinces and territories	0	0

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants

L. Data Notes

There were no external appeals filed by applicants and no refused certificates of registration in this reporting year.

Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.