Intent/Purpose	To establish a policy governing Language Proficiency requirements of the College of Naturopaths of Ontario (the College).	
Definitions	Act	Means the *Naturopathy Act, 2007*, as amended from time to time
	Applicant	Means an individual who has made a formal application to the College for a certificate of registration.
	Canadian Language Benchmarks (CLB) / Niveaux de compétence linguistique canadien	Means the standard used by the IRCC to describe, measure, and recognize the English or French language ability of immigrants and prospective immigrants who plan to live and work in Canada.
	Chief Executive Officer (CEO)	Means the individual appointed by the Council of the College pursuant to section 9(2) of the Code and who performs the duties assigned to the position of Registrar under the RHPA, the Code, the Act and the regulations made thereunder.
	Code	Means the Health Professions Procedural Code, which is Schedule 2 to the RHPA.
	College	Means the College of Naturopaths of Ontario as established under the Act and governed by the RHPA.
	CNME	Means the Council on Naturopathic Medical Education - the North American accrediting agency for naturopathic educational programs that is recognized by the College of Naturopaths of Ontario.
	Council	Means the Council of the College as established pursuant to section 6 of the Act.
	Immigration, Refugees and Citizenship Canada (IRCC)	Means the department of the Government of Canada with responsibility for matters dealing with immigration to Canada, refugees, and Canadian citizenship or its successor organization.
	Language Skills	Means the four communication abilities tested during a language proficiency assessment: reading, writing, listening, and speaking.
	Language Test	Means a test designated in this policy that can be relied upon to test the language proficiency of an applicant.
	PLAR Applicant	Means an individual educated outside of a CNME-accredited program who is seeking eligibility for registration through the PLAR process.

	Prior Learning Assessment and Recognition (PLAR) process	Means a process used to determine the competency of individuals who do not have formal education from a CNME-accredited program.
	Pre-Registration	Means a process whereby an individual who intends to seek registration with the College provides the College with information to establish themselves with the College before formally applying for registration.
	Registrant	Means an individual, as defined in section 1(1) of the Code.
	Registration Committee	Means the statutory committee of the College responsible for all registration matters referred to it by the Chief Executive Officer. Panel(s) of this statutory committee are responsible for all registration matters as set out in the Health Professions Procedural Code.
	Registration Regulation	Means Ontario Regulation 84/14 as amended from time to time.
	RHPA	Means the Regulated Health Professions Act, 1991, as amended from time to time.
General Policy	English or French	It is a requirement for registration with the College that "the applicant must possess sufficient language proficiency, in either English or French, to be able to communicate and comprehend effectively, both orally and in writing." (section 3(3) of the Registration Regulation). This requirement reflects the need for effective communication between the registrant and their patients and staff and to ensure effective inter-professional collaboration. This requirement also assumes effective communication based on language skills as defined in this policy.
	PLAR Applicants	As an assessment process to establish a PLAR applicant's competency to practise, language proficiency is assessed as part of the eligibility criteria to initiate the PLAR program, in accordance with the College's PLAR Program Policy.
Language Proficiency	Requirements Deemed to be Met	An applicant or PLAR applicant who can establish that they are fluent in English or French, and that their education was conducted in English or French, shall be deemed to meet the language proficiency requirements of the College as set out in section 3(3) of the Regulation.
	Evidence of Language Proficiency	In order to be deemed to have met language proficiency requirements, an applicant or PLAR applicant must provide two of the following evidentiary documents:

		• 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), and in accordance with the College's PLAR Program Policy, was obtained which confirms their education was provided in either English or French.
	Requirements Deemed Not to be Met	An applicant or PLAR applicant who does not satisfy the language proficiency requirements is required to undertake, at their cost, one of the accepted language tests.
Language Testing	Accepted Minimum Scores	The results of a successfully completed language test must be equivalent to a level 8 for all skills based on the Canadian Language Benchmarks (CLB) published by IRCC.
	Accepted Language Tests	The College recognizes all language tests approved by the IRCC under the Immigration and Refugee Protection Act (Canada). A complete list of College recognized language tests, and each test's CLB-8 equivalency score, is maintained on the College website.
	Submission of Test Results	Minimum test scores for all language proficiency test components must be achieved during one complete sitting of the selected test. Combined scores from more than one test or from multiple sittings of the same test are not accepted. Test results are valid for two years from the date of the applicant or PLAR applicant passing the test and must be sent directly to the College by the testing agency. Test results submitted directly by applicants or PLAR applicants are not accepted.
Outcomes	Sufficient Language Proficiency	Applicants and PLAR applicants who demonstrate that they have met the language proficiency requirements, either by virtue of their declaration and naturopathic registration in another regulated Canadian jurisdiction, formal education or by meeting the minimum accepted test scores on an accepted language test, will continue to provide the information necessary for the assessment of their eligibility for registration or PLAR.
	Insufficient Language Proficiency	Applicants who do not meet the language proficiency requirements outlined in this policy may:

- withdraw their application or, with the agreement of the Chief Executive Officer (CEO), place their application in abeyance while they remediate their language skills through an appropriate educational program and subsequently, retake an acceptable language test under this policy; or
- proceed with their application in which case the CEO may refer the matter of the applicant not meeting the language proficiency requirements, along with any other relevant issues with respect to their application, to a panel of the Registration Committee on the basis that they have doubts that the applicant has met the requirements.

PLAR applicants, who do not meet the language proficiency requirements outlined in this policy will be notified that they cannot move forward in the PLAR process until they have met this requirement.

Exemptions	Exemption Criteria	An applicant or PLAR applicant who is unable to establish language proficiency as set out in this policy, but who believes that they can demonstrate a degree of proficiency through alternative objective evidence may seek an exemption.
	Review of Exemption Request	Exemption requests will be reviewed by a panel of the Registration Committee (the Panel) on an individual basis. For applicants, such reviews will be conducted as part of a formal referral made under the Code. In its review, the Panel will consider: • to what degree the alternative objective evidence provides proof of language proficiency that is substantially equivalent to the requirements set out in this policy; and • whether the granting of such an exemption will pose a risk to public safety or effective care. • in the case of PLAR, whether the granting of such an exemption will unduly hinder the PLAR applicant from being able to competently complete each component of the PLAR program.
	Alternative Objective Evidence	The following may be provided as alternative objective evidence of language proficiency: • documentation of the language tests and scores the applicant or PLAR applicant has achieved to date, provided as an original hard-copy document, fax or as a PDF. • evidence of experience with verbal communication, validated by letters of support, sent directly from third

parties to the College. These may be provided by naturopaths, other regulated healthcare professionals, previous practice supervisors, previous clients, employers, or members of the public.

- evidence of related health care employment where written documentation was required, validated by letters sent directly from third parties to the College. These may be provided by naturopaths, other regulated healthcare professionals, previous practice supervisors, previous clients, employers, or members of the public.
- evidence of successful, functional communication as demonstrated and validated in a previous supervised practice experience (e.g., completed through an externship or similar). This should be provided directly to the College as an original document, fax, or PDF, signed by a preceptor and/or supervisor.
- other evidence as presented by the applicant or PLAR applicant.

Exemption Request Outcomes

Applicants who do not satisfy 3(3) of the Registration Regulation, but have demonstrated a degree of proficiency that would, with supervision, provide adequate safeguarding of public safety and competent care, may be granted a temporary exemption from the requirement, and may have Terms, Conditions, and/or Limitations (TCLs) placed on the certificate of registration. The TCLs may include but are not limited to:

i. requiring the registrant to disclose to all potential employers that they have not yet met the College's language proficiency requirement; and/or
ii. imposing conditions for supervision (e.g., written documentation, verbal communication); and/or
iii. imposing limitations regarding practice settings or controlled acts.

PLAR applicants who are unable to satisfy language proficiency requirements but whose alternative objective evidence demonstrates a sufficient degree of proficiency to enable them to competently complete the PLAR may be granted an exemption to be permitted to proceed with initiating the PLAR program.

This exemption may be reviewed again at point of application for registration to determine whether a TCL on a certificate of registration is required. In such instances, the PLAR applicant will be provided with an opportunity to provide additional documentation to address 3(3) of the Registration Regulation.