

**Registration Practices Assessment Report**  
**COLLEGE OF NATUROPATHS OF ONTARIO**  
*2016–2018 Assessment Cycle (Cycle 3)*

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**AVAILABILITY OF REPORT**

The Office of the Fairness Commissioner (OFC) provides this report to the regulatory body and posts the full report on its website, [www.fairnesscommissioner.ca](http://www.fairnesscommissioner.ca). In the interests of transparency and accountability, the OFC encourages the regulatory body to provide it to its staff, council members, other interested parties and the public.

## Introduction

Assessment is one of the Fairness Commissioner's mandated roles under the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) and the Regulated Health Professions Act, 1991 (RHPA) – collectively known as fair access legislation.

### Assessment Cycle

One of the primary ways the OFC holds regulators accountable for continuous improvement is through the assessment of registration practices using a three-year assessment cycle.

Assessment cycles alternate between **full assessments** and **targeted assessments**:

- Full assessments address all specific and general duties described in the fair-access legislation.
- Targeted assessments focus on the areas where the OFC made recommendations in the previous full assessment.

### Focus of this Assessment and Report

The 2016-2018 assessment of the College of Naturopaths of Ontario (the College) is a full assessment.

The OFC's detailed report captures the results of the full assessment. The assessment summary provides the following key information from the detailed report:

- duties that were assessed
- an overview of assessment outcomes for specific duty practices
- an overview of comments related to the general duty
- commendable practices
- recommendations

## Assessment Summary

### Specific Duties

#### Specific duties assessed

The regulator has been assessed in all of the specific duties.

#### Comments

The College of Naturopaths of Ontario (the College) was proclaimed July 1, 2015. As with any new organization, the College is building its organizational competencies and is continuously working to enhance its processes. In this assessment, the OFC found that the College shows a strong commitment towards developing and implementing fair registration practices. In particular, the College has demonstrated all of the practices in the following specific-duty areas:

- Timely Decisions, Responses and Reasons
- Information on Appeal Rights
- Access to Records

The OFC has identified nineteen areas where the regulator needs to take further actions to meet their specific-duty obligations.

### General Duty

#### Assessment method

The regulator selected the following method for the assessment of the general duty:

a. OFC practice-based assessment (following the practices in the Assessment Guide)	<input checked="" type="checkbox"/>
b. Regulator practice-based self-assessment (following the practices in the Assessment Guide)	<input type="checkbox"/>
c. Regulator systems-based self-assessment (in which it explains systemically and holistically how it meets the general duty)	<input type="checkbox"/>

#### Principles assessed

The regulator has been assessed on all of the general duty principles: transparency, objectivity, impartiality and fairness.

#### Comments

The College implements practical and logical measures to achieve transparent, objective, impartial and fair registration practices. However, in this assessment, the OFC has identified sixteen areas related to all general duty principles where further developments are needed.

#### Commendable Practices

A *commendable practice* is a program, activity or strategy that goes beyond the minimum standards set by the OFC assessment guides, considering the regulatory body's resources and profession-specific context. Commendable practices may or may not have potential for transferability to another regulatory body.

The regulatory body is demonstrating commendable practices in the following areas:

### Specific Duty

#### Information for Applicants

1. Using a series of videos as an alternative means of presenting information to prospective applicants about the regulated profession and steps in the registration process on its website.

#### Assessment of Qualifications

1. Updating the Prior Learning Assessment and Recognition (PLAR) Document of Education and Experience (DEE) Application Guide to include a breakdown of each of the content areas being assessed as part of the paper-based assessment component of the PLAR process. The additional information details the knowledge and skills expectations for each content area and provides applicants with a more comprehensive understanding of the expectations they need to meet in this component of the assessment process.

## General Duty

### Fairness

1. Offering the PLAR process as an alternative to applicants that have not completed an educational program in naturopathy accredited by the Council on Naturopathic Medical Education (CNME) as part of the registration process.
2. Allowing PLAR applicants to complete certain steps concurrently or move onto others while awaiting outcomes of previous steps in the process. This opportunity provides applicants with increased flexibility in meeting requirements and may reduce overall timelines for registration.
3. Initiating the development of a new entry-to-practice examination that will reflect current practice in the profession and the laws that govern the profession in Ontario. The new examination will replace the Naturopathic Physicians Licensing Examinations (NPLEX) and the Prior Learning Assessment and Recognition Examinations (PLARNEX) administered by the North American Board of Naturopathic Examiners (NABNE). It will be delivered in English and French, and will accommodate the needs of candidates as per the Ontario Human Rights Code and Ontarians with Disabilities Act.
4. Monitoring staff adherence to timelines for responding to applicant or member inquiries and requests for information through annual performance reviews as per the College's strategic operational objectives.

### Recommendations

The regulator can improve in the following areas:

### Specific Duty

#### Information for Applicants

1. Specify the approximate time needed to complete each stage of the registration process for applicants that undergo the PLAR program. Where it is not possible to provide an estimate, include a rationale for variances in these timelines and provide information on factors that may contribute to delays in the process. Include these timelines and further details in registration materials and information for applicants. (Practice 1.3)
2. Clarify information for applicants on alternative ways to demonstrate language proficiency in English or French. (Practice 1.5)
3. Align information on translation requirements for applicants whose supporting documentation is not in English or French in information for applicants and the related policy document. (Practice 1.5)
4. Develop a dedicated section on the website for applicants from non-CNME accredited educational programs to direct them to information on the PLAR process and to inform them that this would be their next step in their registration process with the College after pre-registration. (Practice 1.5)
5. Revise the flowchart for PLAR Stages to better align with the steps in the registration process as provided in web content and the application for registration handbook. (Practice 1.5)

#### Internal Review or Appeal

1. Enhance online content on an applicant's right to an internal review of a registration decision to include content on:
  - a. The format in which applicants must make their written submissions to the Registration Committee for review; and
  - b. The steps and sequence, if applicable, that an applicant needs to follow to complete the internal review process.Include a process to periodically review this content for clarity, accuracy and completeness. (Practice 3.3)

#### Documentation of Qualifications

1. Develop an application checklist to assist applicants applying for registration that undergo the PLAR process. Review the checklist for clarity, accuracy and completeness and provide access to this resource on the College's website. (Practice 5.1)
2. Include a statement on the website directing applicants to contact the College for more information about alternative documentation that may be acceptable if an applicant is unable to obtain required documents for reasons beyond their control. (Practice 5.1)

#### Assessment of Qualifications

1. Ensure that online information for applicants regarding the criteria, policies and process for the PLAR is clear, accurate and complete. Include web content on:
  - a. The criteria against which prior learning during the demonstration-based assessment components of the PLAR process is measured;
  - b. The linkage between the criteria used in the assessment and each of the requirements of the PLAR process;
  - c. The internal review process; and
  - d. The procedures followed by the College to provide applicants in the PLAR process with accommodations, if required. (Practice 6.1)
2. Review each component of the PLAR process to verify that multiple assessment methods do not unnecessarily assess the same required competencies for entry to practice. If duplications are identified, take actions to streamline the process. (Practice 6.7)
3. Develop guidelines for decision-makers that provide procedures for selecting assessors and examiners according to established qualification standards. (Practice 6.9)
4. Develop guidelines for assessors advising them how to monitor the consistency and accuracy of assessment decisions, and to take corrective actions when necessary. (Practice 6.10)
5. Develop guidelines, policies or other similar documents for assessors about the potential for bias or risk to impartiality in the assessment process. These documents should include content on:
  - a. Characteristics or types of bias and/or situations that may compromise the impartiality of assessment decisions;
  - b. Procedures to follow where there is a potential for bias; and
  - c. Actions to prevent discriminatory assessment practices. (Practice 6.11)

6. Conduct a risk assessment or ongoing review process to:
  - d. Identify potential bias in assessment methods or procedures;
  - e. Develop and record mitigating strategies to address potential risks in guidelines for assessors and decision-makers; and
  - f. Establish a means to ensure corrective actions are implemented in a timely manner. (Practice 6.12)
7. Clearly state in information for applicants on the PLAR process any limitations or conditions on the availability of administrative reconsiderations and the reasons why they are necessary. Review these statements for clarity and plain language. (Practice 6.13)
8. Provide established timelines for each stage of the PLAR process in registration materials and information for applicants.
  - g. Include timelines for:
    - i. Assessing qualifications;
    - ii. Communicating results to applicants; and
    - iii. Providing written reasons to applicants that were unsuccessful in the process.
  - h. Develop procedures to follow and monitor adherence to timelines, and to inform applicants about potential delays and estimated decision dates, when delays are unavoidable. (Practice 6.14)
9. Identify and implement measures to verify whether third-parties' assessment practices are transparent, impartial, objective and fair. The measures should include procedures to:
  - i. Evaluate and monitor third-parties' assessment practices; and
  - j. Identify potential issues and, if any issues are identified, take actions to address them. (Practice 6.15)

## Training

1. Develop and implement formal training plans for assessors and decision-makers that cover topics on the following, as they relate to assessment and registration practices:
  - a. Anti-discrimination;
  - b. Cultural diversity;
  - c. The objectives of the fair-access law; and
  - d. Objective and impartial decision-making and what it means in the context of the registration process. (Practice 7.2)
2. Develop guidelines, policies or other similar documents for onboarding and ongoing training of staff. Include procedures for:
  - a. Identifying when new and/or incumbent staff require training;
  - b. Establishing timelines for the completion of training; and
  - c. Verifying that training has been completed according to these timelines. (Practice 7.3)

## General Duty

### Transparency

1. Implement a formal and structured process to seek feedback from applicants and members on their experiences with the registration process. Incorporate feedback where appropriate in discussions about registration policy and practices.
2. Organize information about fees for all registration steps in one section of information for applicants. Include costs associated with the PLAR stages and make reference to related costs, such as those for translations and third-party assessments, that an applicant may incur.
3. Document procedures for considering applicants' requests for access to their records and communicate the process in information for applicants. Procedures should include details on:
  - a. How records are made available to applicants;
  - b. What documents are included in an application record;
  - c. Who may access the records;
  - d. How long records are kept; and
  - e. What limitations, if any, there are to access an application record.

### Objectivity

1. Develop and implement a work plan to document formal guidelines explaining the decision-making steps and procedures to consistently and accurately apply registration requirement criteria.
2. Develop formal procedures to inform decision-makers of any changes to registration criteria, policies and procedures to ensure that they are given information that is current and relevant in a timely manner.
3. Develop and implement measures to monitor, verify and improve the consistency accuracy of registration decisions.

### Impartiality

1. In documents, such as policies, guidelines and codes of conduct, for decision-makers involved in registration and reviews processes:
  - a. Document characteristics and sources of bias and/or situation that may compromise the impartiality of registration decisions;
  - b. Provide strategies to manage situations of bias; and
  - c. Outline conduct to follow for decision-making that is impartial and free of discrimination.
2. Develop guidelines for making registration policy decisions that include steps to identify and address any internal and/or external factors that may improperly influence decisions.
3. Implement control procedures to avoid or minimize bias, to monitor and identify potential sources of bias, and to take corrective actions as needed for impartial decision-making.
4. Develop a code of conduct that commits decision-makers to bias- and discrimination-free registration practices.

## Fairness

1. Develop and implement procedures for a scheduled review of registration requirements to verify that these requirements remain relevant and necessary to practice in the profession.
2. Conduct a regular analysis of fees payable to the College for registration, including fees related to the PLAR process, to ensure that they remain reasonable for applicants. Once the analysis is complete, provide a rationale for the amount of the fees in information for applicants.
3. Develop an internal audit process that will:
  - a. Identify registration decisions that are in compliance and non-compliance with established registration criteria, policies and procedures;
  - b. Identify the potential causes of non-compliance; and
  - c. Provide guidelines for implementing corrective actions, as needed.
4. Develop and implement policies, procedures or other similar documents that provide staff and decision-makers with established timelines for PLAR assessments. Guidelines should include processes to monitor adherence to these timelines.
5. Develop and implement policies, procedures or other similar documents that provide staff and decision-makers with established timelines for the administrative reconsideration process. Guidelines should include processes to monitor adherence to these timelines.
6. Develop guidelines for staff and decision-makers to consider alternative documentation and provide accommodations for applicants, where required documentation cannot be obtained for reasons beyond their control. Guidelines should include processes to:
  - a. Determine whether documentation is in fact unobtainable;
  - b. Consider and examine alternatives; and
  - c. Take appropriate steps to assist the applicant in obtaining the required or alternative documentation.

## Assessment History

The College was proclaimed at the time when the OFC had already initiated the previous assessment cycle. This is the first assessment of the registration practices for the College.

# Detailed Report<sup>[1]</sup>

## Specific Duty

### 1. Specific Duty — Information for Applicants

RHPA, Schedule 2, s. 22.3

#### 1. The regulator describes requirements for registration on its website. [Transparency]

**Assessment Outcome**

Demonstrated

#### 2. The regulator describes all the steps in the registration process on its website, including any processes for assessing qualifications. [Transparency]

**Assessment Outcome**

Demonstrated

**OFC Comments**

The College provides information on its website to describe the specific steps that applicants need to take to complete the registration process. The College also provides prospective applicants with access to a series of videos on the regulation of naturopathic medicine in Ontario. The series includes information on the role of the College, eligibility for registration, and steps to be taken by applicants from a program accredited by the Council on Naturopathic Medical Education (CNME) in the registration process.

**Commendable practice**

Using a series of videos as an alternative means of presenting information to prospective applicants about the regulated profession and steps in the registration process on its website.

#### 3. The regulator provides information on its website about how long the registration process usually takes, including the time required for assessing qualifications. [Transparency]

**Assessment Outcome**

Partially Demonstrated

**OFC Comments**

When assessing this practice, the OFC was seeking evidence that the College has provided information on:

- The approximate time required for an applicant to complete the registration process on its website; and
- Where an estimate is not possible to provide, include a rationale and information on timelines or variables that contribute to the length of the registration process.

In its registration materials, the College states that average processing time for an application for registration is 15.6 days for applicants that have completed a CNME-accredited educational program.

Applicants that have not completed a CNME-accredited educational program are required to undergo a Prior Learning Assessment and Recognition (PLAR) process. This assessment process informs an applicant whether their qualifications are substantially equivalent to the education and examinations completed by a CNME-accredited program graduate and determines their eligibility for registration with the College. In review of the College's materials and resources for applicants, the OFC was not able to find information for applicants on the approximate time required for the PLAR process.

The College has stated that they have plans in the coming year to develop additional resource materials for the PLAR process. These resources would address timelines for each stage of the assessment and provide applicants with additional information on factors that may cause potential delays in the overall registration process. The OFC supports these efforts.

### Recommendations

Specify the approximate time needed to complete each stage of the registration process for applicants that undergo the PLAR program. Where it is not possible to provide an estimate, include a rationale for variances in these timelines and provide information on factors that may contribute to delays in the process. Include these timelines and further details in registration materials and information for applicants.

#### 4. The regulator publishes a fee scale on its website, showing all registration fees that are under the regulator's control, including the fees required for assessing qualifications. [Transparency]

### Assessment Outcome

Demonstrated

#### 5. The regulator ensures that the information required by practices 1-4 in this section is clear, accurate, complete and easy to find. [Transparency]

### Assessment Outcome

Partially Demonstrated

### OFC Comments

When assessing this practice, the OFC was looking for evidence that shows the College has reviewed its information for applicants for clarity, accuracy and completeness, and has organized its information on its website in a format that is easy to navigate.

Information on registration requirements, steps in the process, timelines and fees is available on the College's website; however, the OFC found that there was some information specific to the PLAR process that did not clearly and accurately reflect the actual practices of the regulator. For example, the College's information on proof an applicant can provide for the language proficiency requirement does not appear to align with the conditions listed in the related policy document. In this information, it is also not clear whether an applicant's third-party credential assessment, which would confirm if the primary language of instruction was English or French, would be acceptable to the College to meet the language proficiency requirement. Information on translation requirements for applicants whose documentation is not in English or French also differed between what was found in information for applicants and the related policy document.

As well, it is not intuitive to the OFC how the PLAR process relates to the overall registration process from the College's online content. For increased transparency, the College could clarify the sequence of steps that an applicant undergoing the PLAR needs to take from the pre-registration stage to an issuance of a certificate of registration. Specifically, the College could better align the information on the PLAR stages with its web content and the application for registration handbook on page 5 to illustrate how the assessment stages fit into the overall registration process.

### Recommendations

Clarify information for applicants on alternative ways to demonstrate language proficiency in English or French.

Align information on translation requirements for applicants whose supporting documentation is not in English or French in information for applicants and the related policy document.

Develop a dedicated section on the website for applicants from non-CNME accredited educational programs to direct them to information on the PLAR process and to inform them that this would be their next step in their registration process with the College after pre-registration.

Revise the flowchart for PLAR Stages to better align with the steps in the registration process as provided in web content and the application for registration handbook.

## 2. Specific Duty — Timely Decisions, Responses and Reasons

RHPA, Schedule 2, s.20 (1)

#### 1. If a regulator rejects an application, it gives written reasons to the applicant. [Fairness, Transparency]

### Assessment Outcome

Demonstrated

#### OFC Comments

The College uses standardized templates and guidelines to prepare written decision and reasons letters to applicants that do not meet registration requirements.

The College has stated that they will be reviewing these templates for plain language in the coming year to ensure that communications with applicants are clear, accurate and complete. The OFC supports this effort.

### 3. Specific Duty — Internal Review or Appeal

RHPA, Schedule 2, s. 15, s. 17, s. 19, s. 22.3

#### 1. The regulator provides applicants with an internal review of, or appeal from, registration decisions. [Fairness]

#### Assessment Outcome

Demonstrated

#### 2. The regulator implements rules and procedures that prevent anyone who acted as a decision-maker in a registration decision from acting as a decision-maker in an internal review or appeal of that same registration decision. [Impartiality]

#### Assessment Outcome

Demonstrated

#### 3. The regulator provides information on its website that informs applicants about opportunities for an internal review or appeal. [Transparency]

#### Assessment Outcome

Partially Demonstrated

#### OFC Comments

When assessing this practice, the OFC was looking for evidence that the College's website provides information on:

- Applicants' rights to an internal review of registration decisions;
- Applicants' rights to make submissions;
- The format in which submissions must be made by an applicant;
- The statutory grounds for referring their application to the Registration Committee; and
- The specific steps and sequence that an applicant needs to follow to complete the review.

The OFC was also seeking to verify that the College reviews this information for clarity, accuracy and completeness, and is organized on the website in a way that makes it easy for applicants to find.

The OFC found that the College's website informs applicants that the Registrar is required to refer an application to a panel of the Registration Committee for an internal review if the Registrar proposes to deny registration or imposes terms, conditions or limitations on a certificate of registration. Applicants are also informed that they have the right to make written submissions to the Registration Committee within 30 days of receiving the notice from the Registrar. However, the OFC did not find information for applicants on the format in which these written submissions must be made to the Registration Committee and the steps that an applicant needs to follow to complete the review process. For increased transparency on the internal review process, the OFC recommends that the College add this information to its online content for applicants.

#### Recommendations

Enhance online content on an applicant's right to an internal review of a registration decision to include content on:

- The format in which applicants must make their written submissions to the Registration Committee for review; and
- The steps and sequence, if applicable, that an applicant needs to follow to complete the internal review process.

Include a process to periodically review this content for clarity, accuracy and completeness.

#### 4. Specific Duty — Information on Appeal Rights

RHPA, Schedule 2, s. 20, s. 21, s. 22

**1. On its website, the regulator informs applicants of their right to request further review of, or appeal from, the review or appeal decision. [Transparency]**

##### Assessment Outcome

Demonstrated

##### OFC Comments

When assessing this practice, the OFC was seeking evidence that the College informs its applicants of their right to an appeal by the Health Professions Appeal and Review Board (HPARB) and specifies any limits to those rights, if they exist. Additionally, the OFC was looking for measures the College takes to ensure that this information is clear, accurate and complete, and organized on their website so that it is easy to find.

The College provides information on an applicant's right to an external appeal with the HPARB as part of its application handbook for registration available on its website. The HPARB is also referenced in online information for applicants undergoing the PLAR process. However, the OFC understands that the College will be revising its online content for PLAR to clarify that pre-registration decisions cannot be appealed to the HPARB.

##### Suggestions for continuous improvement

Clarify that pre-registration decisions cannot be appealed to the Health Professions Appeal and Review Board (HPARB) in online information for the PLAR process.

#### 5. Specific Duty — Documentation of Qualifications

RHPA, Schedule 2, s. 22.4(1)

**1. The regulator provides information on its website about the documents that must accompany an application to demonstrate qualifications. [Transparency]**

##### Assessment Outcome

Partially Demonstrated

##### OFC Comments

The College provides applicants with information on documentation for qualifications through various resource materials on their website, including as part of web content, handbooks and policy documents. For example, the College's website provides an Entry-to-Practice Checklist for applicants that have completed a CNME-accredited educational program that outlines the requirements for each step of the registration process. Although mentioned on the checklist that there is also a PLAR Application Checklist available, the OFC was unable to locate this document on the College's website.

The College has reported that they do not currently have a process to consider alternative documentation to meet registration requirements for applicants who are unable to obtain required documents for reasons beyond their control. The College stated that requests from applicants who require information on alternatives are handled on a case-by-case basis. However, the OFC was unable to locate instructions for applicants to make such requests on the College's website.

##### Recommendations

Develop an application checklist to assist applicants applying for registration that undergo the PLAR process. Review the checklist for clarity, accuracy and completeness and provide access to this resource on the College's website.

Include a statement on the website directing applicants to contact the College for more information about alternative documentation that may be acceptable if an applicant is unable to obtain required documents for reasons beyond their control.

## 6. Specific Duty — Assessment of Qualifications

RHPA, Schedule 2, s. 22.4(2)

### 1. On its website, the regulator informs applicants about the process, criteria, and policies for the assessment of qualifications. [Transparency]

#### Assessment Outcome

Partially Demonstrated

#### OFC Comments

When assessing this practice, the OFC was seeking evidence that the College provides information on its website about the assessment of qualifications through the PLAR process, namely:

- The criteria used for assessing qualifications;
- How the criteria are linked to the requirements for entering the profession;
- Opportunities to appeal or review the results of qualifications assessments; and
- Policies and procedures relating to special considerations.

The OFC was also looking for evidence that the College reviews this information for clarity, accuracy and completeness, and organizes this information in a way that is easy to find on their website.

For the criteria used to assess qualifications, the OFC found that the College's PLAR policy document and the Documentation of Education and Experience (DEE) form and guide detail the criteria used in the paper-based assessment of an applicant's education and experience. However, the OFC did not find information on the specific criteria used for the demonstration-based assessment component or how the criteria used are linked to each requirement as part of the College's web content on the PLAR process.

Information on an applicant's right to request an internal review of an assessment decision if their education and experience are not deemed substantially equivalent to a CNME-accredited program in naturopathy is referenced in the College's PLAR policy document. However, the OFC was not able to find details on the steps an applicant needs to take to make a request for an internal review or whether an applicant can make written submissions to support their request as part of the College's online content.

The OFC found that the College's Examinations Policy refers applicants for the Prior Learning Assessment and Recognitions Examinations (PLARNEX) and the Naturopathic Physicians Licensing Examinations (NPLEX) to the North American Board of Naturopathic Examiners (NABNE) for the assessment criteria used. The same policy document specifies that applicants who fail the examinations can appeal the College's decision to deny registration to HPARB.

With regards to special considerations for applicants, the Examinations Policy outlines the procedures for applicants that require accommodations during the NPLEX and PLARNEX. However, the OFC did not find that the College's website had information on policies or procedures to provide accommodations to those with special needs as they undergo the other components of the PLAR process. The College informed the OFC that there are plans to develop general accessibility policies and related information for applicants for all program areas in the coming year. The OFC supports this commitment.

#### Recommendations

Ensure that online information for applicants regarding the criteria, policies and process for the PLAR is clear, accurate and complete. Include web content on:

- The criteria against which prior learning during the demonstration-based assessment components of the PLAR process is measured;
- The linkage between the criteria used in the assessment and each of the requirements of the PLAR process;
- The internal review process; and
- The procedures followed by the College to provide applicants in the PLAR process with accommodations, if required.

### 2. The regulator communicates the results of qualifications assessment to each applicant in writing. [Transparency]

#### Assessment Outcome

Demonstrated

3. The regulator gives its assessors access to assessment criteria, policies and procedures. [Transparency]

**Assessment Outcome**

Demonstrated

4. The regulator shows that its tests and exams measure what they intend to measure\*. [Objectivity]

**Assessment Outcome**

Demonstrated

5. The regulator states its assessment criteria in ways that enable assessors to interpret them consistently. [Objectivity]

**Assessment Outcome**

Demonstrated

6. The regulator ensures that the information about educational programs that is used to develop or update assessment criteria is kept current and accurate. [Objectivity]

**Assessment Outcome**

Demonstrated

7. The regulator links its assessment methods to the requirements/standards for entry to the profession or trade. [Objectivity]

**Assessment Outcome**

Not Demonstrated

**OFC Comments**

When assessing this practice, the OFC was looking for documented evidence that the College has linked its assessment methods to the required competencies for entry to the profession.

The College informed the OFC that during the initial development of the PLAR process, entry-to-practice competencies were mapped to each assessment method with the help of consultants and members of the profession. In some cases, the College determined that specific competencies would need to be measured using both paper- and demonstration-based assessment methods to gain a more fulsome understanding of an applicant's professional knowledge, skills and judgment.

The OFC understands that the College has plans to conduct a full review of the PLAR process to remove any unnecessary steps for applicants and to provide supporting rationale for entry-to-practice competencies that require more than one assessment method. As part of this review, the OFC recommends that the College review the individual components of the PLAR process to ensure that assessment method do not unnecessarily duplicate the competencies being assessed and are streamlined where possible.

**Recommendations**

Review each component of the PLAR process to verify that multiple assessment methods do not unnecessarily assess the same required competencies for entry to practice. If duplications are identified, take actions to streamline the process.

**8. The regulator requires that assessors consistently apply qualifications assessment criteria, policies and procedures to all applicants. [Objectivity]**

**Assessment Outcome**

Demonstrated

**Commendable practice**

Updating the PLAR Document of Education and Experience Application Guide to include a breakdown of each of the content areas being assessed as part of the paper-based assessment component of the PLAR process. The additional information details the knowledge and skills expectations for each content area and provides applicants with a more comprehensive understanding of the expectations they need to meet in this component of the assessment process.

**9. The regulator uses only qualified assessors to conduct the assessments. [Objectivity]**

**Assessment Outcome**

Partially Demonstrated

**OFC Comments**

When assessing this practice, the OFC was looking for documented evidence that the College has established qualification standards for assessors and examiners, as well as processes in place to select assessors and examiners according to these qualification standards.

The OFC found that the College’s Examinations Policy outlines the criteria and considerations taken by the College to select examiners that administer entry-to-practice written and clinical examinations. As well, the College’s website provides job descriptions for PLAR Assessors and Examiners that detail the selection criteria for each role. However, the OFC seeks evidence that the College has processes in place for selecting assessors and examiners according to established qualifications standards.

**Recommendations**

Develop guidelines for decision-makers that provide procedures for selecting assessors and examiners according to established qualification standards.

**10. The regulator monitors the consistency and accuracy of decisions, and takes corrective actions as necessary, to safeguard the objectivity of its assessment decisions. [Objectivity]**

**Assessment Outcome**

Not Demonstrated

**OFC Comments**

When assessing this practice, the OFC was seeking evidence that the College takes measures to monitor the consistency and accuracy of its assessment decisions, and takes corrective actions as needed. The OFC did not find sufficient evidence of these actions.

**Recommendations**

Develop guidelines for assessors or their supervisors advising them how to monitor the consistency and accuracy of assessment decisions, and to take corrective actions when necessary.

**11. The regulator prohibits discrimination and informs assessors about the need to avoid bias in the assessment. [Impartiality]**

**Assessment Outcome**

Not Demonstrated

#### OFC Comments

When assessing this practice, the OFC was seeking evidence that the College both identifies and documents characteristics and sources of bias, circumstances that may compromise impartial assessment decisions, and what assessors need to do if they find themselves in these circumstances. The OFC was also looking to verify that the College prohibits discrimination in the assessment of qualifications.

The College's Examinations Policy document has information about bias and conflicts of interest for examiners. However, the OFC was not able to find evidence that there is similar information provided by the College for staff as part of the assessment process. The OFC also did not find evidence that the College has guidelines or other similar documents in place to inform assessors and examiners about non-discriminatory assessment practices.

The College has indicated that they are in the process of developing formal documentation for assessors that will address impartial decision-making practices to be used in the assessment process. The OFC supports this commitment.

#### Recommendations

Develop guidelines, policies or other similar documents for assessors about the potential for bias or risk to impartiality in the assessment process. These documents should include content on:

- Characteristics or types of bias and/or situations that may compromise the impartiality of assessment decisions;
- Procedures to follow where there is a potential for bias; and
- Actions to prevent discriminatory assessment practices.

### 12. The regulator implements procedures to safeguard the impartiality of its assessment methods and procedures. [Impartiality]

#### Assessment Outcome

Partially Demonstrated

#### OFC Comments

This practice requires identifying and assessing measures a regulator takes to avoid or minimize bias in its assessment decisions, to verify the impartiality of its decisions, and to implement corrective actions if needed.

The College informed the OFC that they take measures to avoid or prevent bias in assessment decisions, including identifying conflicts of interest amongst staff, reviewing unsuccessful applications with staff and legal counsel, and providing standardized training on assessment criteria. While these are important actions to take, the OFC finds that these measures alone do not appear to be sufficient to safeguard the impartiality of its assessment decisions. The OFC recommends that the College take additional steps to monitor assessment procedures to find potential sources of impartiality, and to identify and implement corrective actions as necessary.

#### Recommendations

Conduct a risk assessment or ongoing review process to:

- Identify potential bias in assessment methods or procedures;
- Develop and record mitigating strategies to address potential risks in guidelines for assessors and decision-makers; and
- Establish a means to ensure corrective actions are implemented in a timely manner.

### 13. The regulator gives applicants an opportunity to appeal the results of a qualifications assessment or to have the results reviewed. [Fairness]

#### Assessment Outcome

Partially Demonstrated

#### OFC Comments

Applicants undergoing the PLAR process can request an administrative reconsideration of their initial application and assessment decision. The College also provides applicants the opportunity to appeal an examination decision in cases where an applicant believes there were procedural and/or environmental factors or perceptions of undue bias that affected their performance on the exam. However, when assessing this practice, the OFC was not able to confirm whether there are any limitations or conditions on the availability of administrative reconsiderations as part of the PLAR process and if there are, whether the College has provided a rationale indicating why they are necessary.

### Recommendations

Clearly state in information for applicants on the PLAR process any limitations or conditions on the availability of administrative reconsiderations and the reasons why they are necessary. Review these statements for clarity and plain language.

#### 14. The regulator assesses qualifications, communicates results to applicants, and provides written reasons for unsuccessful applicants, without undue delay. [Fairness]

### Assessment Outcome

Partially Demonstrated

### OFC Comments

The College has provided established timelines for assessing qualifications and communicating assessment results to applicants from CNME-accredited educational programs in their information for applicants. However, the OFC did not find established timelines for assessing and communicating results to applicants that are required to undertake the PLAR process. The OFC also did not find evidence of a process to monitor adherence to these established timelines.

The OFC understands that the College is in the process of defining these timelines for each step in the PLAR process. The OFC supports this effort.

### Recommendations

Provide established timelines for each stage of the PLAR process in registration materials and information for applicants.

- Include timelines for:
  - Assessing qualifications;
  - Communicating results to applicants; and
  - Providing written reasons to applicants that were unsuccessful in the process.
- Develop procedures to follow and monitor adherence to timelines, and to inform applicants about potential delays and estimated decision dates, when delays are unavoidable.

#### 15. Regulators that rely on third-party assessments establish policies and procedures to hold third-party assessors accountable for ensuring that assessments are transparent, objective, impartial and fair. [Transparency, Objectivity, Impartiality, Fairness]

### Assessment Outcome

Not Demonstrated

### OFC Comments

The College relies upon a number of third-party agencies to make assessment decisions with regards to credential evaluations, language testing and examinations. The OFC was seeking verification that the College takes measures to regularly evaluate and monitor third-party assessment practices for transparency, objectivity, impartiality and fairness. The OFC was also looking for evidence that the College works in collaboration with third-party assessors to identify and address any potential issues raised by applicants as part of the registration process. The OFC did not find evidence of these actions.

### Recommendations

Identify and implement measures to verify whether third-parties' assessment practices are transparent, impartial, objective and fair. The measures should include procedures to:

- Evaluate and monitor third-parties' assessment practices; and
- Identify potential issues and, if any issues are identified, take actions to address them.

## 7. Specific Duty — Training

RHPA, Schedule 2, s. 22.4(3)

**1. The regulator provides training for staff and volunteers who assess qualifications or make registration, internal review or appeal decisions. [Objectivity, Impartiality, Fairness]**

**Assessment Outcome**

Demonstrated

**2. The regulator addresses topics of objectivity and impartiality in the training it provides to assessors and decision-makers. [Objectivity, Impartiality]**

**Assessment Outcome**

Partially Demonstrated

**OFC Comments**

The College has reported that assessors and committee members have informally discussed topics relating to objective and impartial decision-making. When assessing this practice, the OFC was seeking documented evidence that the College provides its assessors and decision-makers with training that addresses:

- Anti-discrimination;
- Cultural diversity;
- The objectives of the fair-access law; and
- Objective and impartial decision-making and what it means in the context of the registration process.

The OFC was not able to find sufficient evidence of these actions.

**Recommendations**

Develop and implement formal training plans for assessors and decision-makers that cover topics on the following, as they relate to assessment and registration practices:

- Anti-discrimination;
- Cultural diversity;
- The objectives of the fair-access law; and
- Objective and impartial decision-making and what it means in the context of the registration process.

**3. The regulator identifies when new and incumbent staff and volunteers require training and provides the training accordingly. [Objectivity, Impartiality, Fairness]**

**Assessment Outcome**

Partially Demonstrated

**OFC Comments**

The College has reported that they provide new and incumbent staff with both onboarding and ongoing training opportunities. Additional training is provided when staff identify that it is needed to perform their duties. However, the OFC seeks evidence to determine whether the College has formal processes in place to identify when training for staff is required and to monitor completion of training as per those timelines. The OFC did not find sufficient evidence of these actions.

### Recommendations

Develop guidelines, policies or other similar documents for onboarding and ongoing training of staff. Include procedures for:

- Identifying when new and/or incumbent staff require training;
- Establishing timelines for the completion of training; and
- Verifying that training has been completed according to these timelines.

## 8. Specific Duty — Access to Records

RHPA, Schedule 2, s. 16

### 1. The regulator provides each applicant with access to his or her application records. [Fairness]

#### Assessment Outcome

Demonstrated

#### Suggestions for continuous improvement

Document the process for considering applicant requests for access to their records in guidelines, policies or other similar documents. Include procedures for document sharing and disclosure of applicant records to third-parties and information on the length of time records are kept by the College. Communicate the process in information for applicants or registration materials.

### 2. If there is a fee for making records available, the regulator gives applicants an estimate of this fee. [Transparency]

#### Assessment Outcome

Not Applicable

#### OFC Comments

The College does not have a fee for making records available to applicants.

### 3. If there is a fee for making records available, the regulator review the fee to ensure that it does not exceed the amount of reasonable cost recovery. [Fairness]

#### Assessment Outcome

Not Applicable

#### OFC Comments

The College does not have a fee for making records available to applicants.

## General Duty

RHPA, Schedule 2, S.22.2

### Transparency

- Maintaining openness
- Providing access to, monitoring, and updating registration information
- Communicating clearly with applicants about their status

#### Assessment Outcome

The College takes various measures to achieve transparent registration practices. To take these efforts even further, the OFC identified four opportunities for improvement and four suggestions for continuous improvement.

##### Openness

The College implements various steps to enable interested stakeholders to understand how the registration process operates and how registration decisions are made. The College's actions include:

- Providing detailed information and documentation on its website about registration requirements and processes, including application forms, handbooks and paths to registration flowcharts;
- Posting council meeting draft agendas, approved minutes and materials on their website and informing interested stakeholders about up and coming meetings;
- Providing access to committee terms of references, appointments and annual reports, as well as the College's staff directory, on their website;
- Publishing a quarterly newsletter, "iNformed", for members and stakeholders to share news about developments at the College, naturopathic practice and professional regulation;
- Distributing professional advisories, broadcast emails and monthly news bulletins to provide members and other interested stakeholders with timely information and deadlines;
- Developing a series of short videos, "The College and You," that give interested stakeholders an overview of the College's role in regulating the profession and serving the public interest;
- Promoting opportunities for members from diverse backgrounds, work experiences and perspectives from different areas of practice to volunteer with the College; and
- Evaluating and publishing results from stakeholder consultations and surveys to plan improvements in communications and outreach efforts with members.

It is evident that the College has numerous structures and processes already in place to promote transparency. However, the OFC was also looking for evidence that the College takes measures to elicit feedback from applicants and members about their registration experiences and to use this input where possible to improve the registration process.

##### Access

The College ensures that applicants have access to relevant information at the time and in the way they need to take the appropriate steps in the registration process. For example, the College provides information on the steps that an applicant can complete before arrival in Canada and the third-party agencies involved in the PLAR process. The College also provides applicants for registration with access to a range of handbooks, guides and other useful information for entering the profession. However, the OFC was not able to find registration materials for applicants specific to the PLAR process. The OFC recommends that the College continue to develop and enhance information and resources on the PLAR process for applicants of non-CNME accredited educational programs.

With respect to fees, the OFC did not find evidence of all fees associated with the PLAR process on the College's website. For example, the College does not provide costs for the PLARNEX and clinical sciences examinations or related fees for third-party credential and language assessments that are required for registration.

While the College does provide estimated timelines for the registration process for applicants from CNME-accredited educational programs, timelines for applicants that are required to undergo the PLAR process are not stated. While the OFC understands that there have been no applicants that have completed the PLAR process to date, it is important for the College to estimate these timelines for each stage of the process in its information for applicants. A recommendation has been made with regards to timelines for the registration process under Practice 1.3.

While the College has reported that an applicant can access their records, the OFC did not find this information on the College's website.

##### Clarity

The College takes measures to communicate with applicants throughout the registration process and to ensure that the information provided is complete, accurate and easy to understand. For instance, the College:

- Communicates information on timelines, deadlines and time limits in registration materials and information for applicants on their website;
- Promptly notifies applicants about the status of their applications throughout the registration process; and
- Sends reminders to applicants about missing documentation until the application is complete.

The OFC understands that the College will be undergoing a review of the PLAR process in the coming months and revising procedures related to the administrative reconsideration and appeals processes. Any changes made will result in subsequent revisions to the PLAR policy document, registration materials and online information for applicants. The OFC encourages the College to take measures to ensure that information used to communicate these revised processes is complete, accurate and easy to understand.

#### Recommendations

Implement a formal and structured process to seek feedback from applicants and members on their experiences with the registration process. Incorporate feedback where appropriate in discussions about registration policy and practices.

Organize information about fees for all registration steps in one section of information for applicants. Include costs associated with the PLAR stages and make reference to related costs, such as those for translations and third-party assessments, that an applicant may incur.

Document procedures for considering applicants' requests for access to their records and communicate the process in information for applicants. Procedures should include details on:

- How records are made available to applicants;
- What documents are included in an application record;
- Who may access the records;
- How long records are kept; and
- What limitations, if any, there are to access an application record.

## Objectivity

- Designing criteria and procedures that are reliable and valid
- Monitoring and following up threats to validity and reliability

#### Assessment Outcome

The College takes measures to achieve objectivity in its registration process. The OFC has identified three opportunities for improvement for further development.

##### Reliability

To ensure that registration decisions are reliable, the College:

- Provides decision-makers with access to policy documents and procedures to reach registration decisions;
- Supplies decision-makers with sufficient training to ensure a shared understanding of their roles and responsibilities as part of the registration process;
- Refers to precedent decisions and reasons, where appropriate, during the assessment of applications; and
- Implements processes to review and update statements describing registration requirements and criteria for clarity.

While the College takes steps to ensure that its decision-makers have access to criteria, policies and procedures to do their work, the OFC noted that formal guidelines and procedures had not yet been developed for all registration requirements. For example, according to the College's policy on language proficiency, the Registrar may interview an applicant as an alternative means of establishing their fluency in English or French to meet the requirement. However, the OFC was not able to find documented procedures to be followed by the Registrar for this form of assessment. In another example, the OFC did not find sufficient evidence of formal guidelines for decision-makers to assess the good character requirement.

The College has reported that they conduct orientation sessions with decision-makers to review changes to assessment criteria and tools. However, the OFC seeks evidence that there are formal and structured processes in place to inform decision-makers about changes to this information in a timely manner.

##### Validity

To ensure that the College takes measures to monitor the objectivity of its registration decisions, the OFC was seeking evidence that the regulator has processes in place to verify the accuracy and consistency of its decisions and to identify and implement corrective actions as needed. The OFC did not find evidence of this action.

#### Recommendations

Develop and implement a work plan to document formal guidelines explaining the decision-making steps and procedures to consistently and accurately apply registration requirement criteria.

Develop formal procedures to inform decision-makers of any changes to registration criteria, policies and procedures to ensure that they are given information that is current and relevant in a timely manner.

Develop and implement measures to monitor, verify and improve the consistency accuracy of registration decisions.

## Impartiality

- Identifying bias, monitoring, and taking corrective action
- Implementing strategies

### Assessment Outcome

#### Identification of Bias

The College implements measures to achieve impartiality in its registration decisions. For example, the College has reported that they provide their staff and committee members with training on the Accessibility for Ontarians with Disabilities Act (AODA), conflicts of interest, and fair and equitable registration practices. The College also provides its staff and committee members with access to guidelines and policies addressing conflict of interest, harassment and discrimination. However, when assessing this general duty principle, the OFC was also seeking evidence that the College takes actions to:

- Identify, document and inform decision-makers about circumstances that may compromise the impartiality of its registration decisions; and
- Inform decision-makers about what they should do when they find themselves in circumstances that may compromise the impartiality of its registration decisions.

At present, sufficient evidence of these actions was not found.

The College has reported that there are guidelines in place for policy decision-making. However, it is not clear to the OFC whether the College takes formal measures to monitor its decision-making process to ensure that decisions are made in the public interest and are not influenced by internal or external factors. Such measures include:

- Having a process to consider internal or external factors that may improperly influence policy or individual case decisions and to determine what actions are needed for impartial decision-making;
- Considering why a policy change is in the public interest and/or what issues it intends to resolve; and
- Exploring what positive and/or negative impacts the policy change may have on those affected by it.

The OFC did not find sufficient evidence of these actions. Recommendations have been provided below.

#### Strategies

The College implements the following strategies to avoid bias in its decision-making:

- Provides assessors and committee members with informal training on the principles of fair registration practices; and
- Directs its decision-makers to commit to bias-free and discrimination-free assessment practices and registration decisions.

When assessing this general duty principle, the OFC was also looking for confirmation that the College has procedures in place to:

- Avoid or minimize bias in registration decisions;
- Monitor decision-making procedures to identify sources of impartiality; and
- Identify and implement corrective actions as necessary.

As well, the OFC was seeking evidence that the College has guidelines, policies or other similar documents in place to obtain assessors' and committee members' commitments to bias- and discrimination-free registration practices.

The OFC did not find sufficient evidence of these actions. Recommendations for improvements in these areas have been provided below.

### Recommendations

In documents, such as policies, guidelines and codes of conduct, for decision-makers involved in registration and reviews processes:

- Document characteristics and sources of bias and/or situation that may compromise the impartiality of registration decisions;
- Provide strategies to manage situations of bias; and
- Outline conduct to follow for decision-making that is impartial and free of discrimination.

Develop guidelines for making registration policy decisions that include steps to identify and address any internal and/or external factors that may improperly influence decisions.

Implement control procedures to avoid or minimize bias, to monitor and identify potential sources of bias, and to take corrective actions as needed for impartial decision-making.

Develop a code of conduct that commits decision-makers to bias- and discrimination-free registration practices.

## Fairness

- Ensuring substantive fairness
- Ensuring procedural fairness
- Ensuring relational fairness

### Assessment Outcome

The College takes a number of measures to promote fairness in its registration practices.

#### Substantive Fairness

The College takes the following actions to promote substantive fairness:

- Offers the PLAR process as an alternative for applicants that have not completed a CNME-accredited educational program to meet registration requirements; and
- Shows connections between registration requirements and entry-to-practice standards by mapping each requirement to the specific competencies or set of competencies that it addresses in information for applicants and registration materials.

However, when assessing this general duty principle, the OFC was also looking for evidence that the College has a process to periodically review registration requirements to ensure that they continue to be relevant and necessary to professional practice. The College has reported that they do not currently have such a process in place.

The OFC was also seeking confirmation that the College conducts regular reviews of the reasonableness of its fees and provides a rationale for the fees under their control, including those fees associated with the PLAR process. The College stated that they have recently reviewed and adjusted their registration fees. However, they also confirmed that fees for the PLAR process were not reviewed and that a rationale has not been provided for their amounts.

#### Procedural Fairness

The College takes steps to support procedural fairness in its registration practices, including:

- Highlighting steps that an applicant can take to start the registration process from outside of Canada;
- Reviewing its registration practices to identify opportunities for improvements and streamlining (e.g. amending the proof of identity policy document to make it easier for an applicant to submit the required documentation);
- Consulting with legal counsel on registration decisions before they are issued;
- Using a tracking tool to monitor timelines for processing applications for registration and communicating decisions;
- Analyzing registration procedures to remove unnecessary steps and reduce overall processing times; and
- Informing applicants about potential delays and estimated timelines for decisions, where delays are unavoidable, throughout the registration process.

While the College takes measures as described above to promote procedural fairness, the OFC was also looking for evidence that the College has processes in place to ensure that registration decisions align with registration criteria, policies and procedures, and to take corrective actions where deviations have been identified. The OFC was not able to find sufficient evidence of these actions.

The College has reported that they are planning to undergo a full review of the PLAR process in 2018-19. This will involve a review of the assessment requirements used to determine substantial equivalency, an update of the resources and tools used by assessors and decision-makers, and the development of a range of materials for applicants in the process. The OFC also understands that as part of this review, the College will establish timelines for making and communicating registration decisions for applicants that complete the PLAR assessment. The College has indicated that they also intend to revise procedures for administrative reconsiderations. This will include establishing timelines for making and communicating internal review decisions and reasons to applicants, and putting monitoring processes in place to ensure adherence to these timelines. Revisions made to the PLAR and administrative reconsideration processes will be reflected in information for applicants and registration materials, and reviewed for clarity, accuracy and completeness. The OFC supports the College in these efforts.

Currently, applicants undergoing the PLAR process are required to complete the PLARNEX, which is equivalent to the NPLEX offered by the NABNE. According to the related policy document, PLARNEX candidates have up to two attempts to challenge the exam. In comparison, candidates from CNME-accredited educational programs have up to three attempts to successfully complete the NPLEX exam. At this time, NPLEX and PLARNEX candidates are not provided with sufficient accommodations for special needs or able to access the exams in French. The OFC understands that the College is in the process of developing a new entry-to-practice examination for roll-out in 2019 that will address these issues. This examination will replace both the NPLEX and PLARNEX, be delivered to applicants by the College, and reflect current practice and the laws that govern the profession in Ontario. The new examination will be delivered in both English and French, and accommodations will be provided to candidates as required per the Ontario Human Rights Code and Ontarians with Disabilities Act. The OFC supports the College's commitment in developing this new examination.

#### Relational Fairness

The College takes the following actions to ensure relational fairness for its applicants:

- Clearly details the required steps for examination candidates and the College to provide accommodations for special needs in their Examinations Policy; and
- Provides orientation to AODA for all staff as part of onboarding and ongoing training.

In addition to these measures, the OFC was also seeking documented evidence that the College has processes in place to consider and provide accommodations in cases where an applicant cannot obtain required documentation for reasons beyond their control. The OFC did not find sufficient evidence of this action.

### Recommendations

Develop and implement procedures for a scheduled review of registration requirements to verify that these requirements remain relevant and necessary to practice in the profession.

Conduct a regular analysis of fees payable to the College for registration, including fees related to the PLAR process, to ensure that they remain reasonable for applicants. Once the analysis is complete, provide a rationale for the amount of the fees in information for applicants.

Develop an internal audit process that will:

- Identify registration decisions that are in compliance and non-compliance with established registration criteria, policies and procedures;
- Identify the potential causes of non-compliance; and
- Provide guidelines for implementing corrective actions, as needed.

Develop and implement policies, procedures or other similar documents that provide staff and decision-makers with established timelines for PLAR assessments. Guidelines should include processes to monitor adherence to these timelines.

Develop and implement policies, procedures or other similar documents that provide staff and decision-makers with established timelines for the administrative reconsideration process. Guidelines should include processes to monitor adherence to these timelines.

Develop guidelines for staff and decision-makers to consider alternative documentation and provide accommodations for applicants, where required documentation cannot be obtained for reasons beyond their control. Guidelines should include processes to:

- Determine whether documentation is in fact unobtainable;
- Consider and examine alternatives; and
- Take appropriate steps to assist the applicant in obtaining the required or alternative documentation.

### Commendable Practices

Offering the PLAR process as an alternative to applicants that have not completed an educational program in naturopathy accredited by the Council on Naturopathic Medical Education (CNME) as part of the registration process.

Allowing PLAR applicants to complete certain steps concurrently or move onto others while awaiting outcomes of previous steps in the process. This opportunity provides applicants with increased flexibility in meeting requirements and may reduce overall timelines for registration.

Initiating the development of a new entry-to-practice examination that will reflect current practice in the profession and the laws that govern the profession in Ontario. The new examination will replace the Naturopathic Physicians Licensing Examinations (NPLEX) and the Prior Learning Assessment and Recognition Examinations (PLARNEX) administered by the North American Board of Naturopathic Examiners (NABNE). It will be delivered in English and French, and will accommodate the needs of candidates as per the Ontario Human Rights Code and Ontarians with Disabilities Act.

Monitoring staff adherence to timelines for responding to applicant or member inquiries and requests for information through annual performance reviews as per the College's strategic operational objectives.

## Background

### Assessment Methods

Assessments are based on the [Registration Practices Assessment Guide: For Regulated Professions and Health Regulatory Colleges](#). The guide presents registration practices relating to the specific duties and general duty in the fair access legislation.

A regulatory body's practices can be measured against the fair access legislation's specific duties in a straightforward way. However, the general duty is broad, and the principles it mentions (transparency, objectivity, impartiality and fairness) are not defined in the legislation.

As a result, the specific-duty and general-duty obligations are assessed differently (see the [Strategy for Continuous Improvement of Registration Practices](#)).

### Specific Duties

The OFC can clearly determine whether a regulatory body demonstrates the specific-duty practices in the assessment guide. Therefore, for each specific-duty practice, the OFC provides one of the following assessment outcomes:

- Demonstrated – all required elements of the practice are present or addressed
- Partially Demonstrated – some but not all required elements are present or addressed
- Not Demonstrated – none of the required elements are present or addressed
- Not Applicable – this practice does not apply to the College's registration practices

### General Duty

Because there are many ways that a regulatory body can demonstrate that its practices, overall, are meeting the principles of the general duty, the OFC makes assessment *comments* for the general duty, rather than identifying assessment outcomes. For the same reason, assessment comments are made by principle, rather than by practice.

For information about the OFC's interpretations of the general-duty principles and the practices that the OFC uses as a guideline for assessment, see [the OFC's website](#).

### Commendable Practices and Recommendations

Where applicable, the OFC identifies commendable practices or recommendations for improvement related to the specific duties and general duty.

### Sources

Assessment outcomes, comments, and commendable practices and recommendations are based on information provided by the regulatory body. The OFC relies on the accuracy of this information to produce the assessment report. The OFC compiles registration information from sources such as the following:

- Fair Registration Practices Reports, audits, Entry-to-Practice Review Reports, annual meetings
- the regulatory body's:
  - website
  - policies, procedures, guidelines and related documentation templates for communication with applicants
  - regulations and bylaws
  - internal auditing and reporting mechanisms
  - third-party agreements and related monitoring or reporting documentation
  - qualifications assessments and related documentation
- targeted questions/requests for evidence that the regulatory body demonstrates a practice or principle

For more information about the assessment cycle, assessment process, and legislative obligations, see the [Strategy for Continuous Improvement](#).

## References

1. ^ Please note: Suggestions for continuous improvement appear only in the detailed report. Suggestions for improvement are not intended to be recommendations for action to demonstrate a practice, but are made solely to provide suggestions for areas that a regulatory body may consider improving in the future.