

# Strategic Plan

APRIL 1, 2023 TO MARCH 31, 2027



## INTRODUCTION

In the fall of 2022, the Council of the College of Naturopaths of Ontario undertook a strategic planning exercise to set the direction of the College for the following four years. The planning was undertaken as a meeting of a Committee of the Whole Council, over three half-day meetings held in November and December 2022, with the final report being presented to the Council for approval and adoption.

## BACKGROUND

In 2021, the Governance Policy Review Committee (GPRC), a Committee of the Council, undertook a review of the Council's Ends Statements and Ends Priority Policies with an eye to recommending any changes to the Council. The GPRC noted that the Ends Policies had been prepared in early 2016 and although they had had undergone minor edits since that time, they remained substantially unchanged. The GPRC noted for the Council that it was a best practice to undertake strategic planning every three to five years and recommended that the Council do so in 2022. The Council accepted the recommendation of the GPRC and charged the Chief Executive Officer (CEO) with the task of developing and implementing an appropriate planning opportunity for the Council.

The College engaged Carolyn Everson of The Everson Company, a consultant with extensive experience in supporting strategic planning initiatives in the not-for-profit section and in particular, with health regulatory Colleges. Ms. Everson with the support of the CEO set out a strategic planning process (Appendix 1) that was presented to and adopted by the Council.

## RESEARCH

As part of the preparation process, advance work was undertaken by the senior staff of the College to support the Council's deliberations. This work included the creation of a SWOT (Strengths, Weaknesses, Opportunities and Threats) Analysis (Appendix 2), a PESTLE (Political, Economic, Social, Technological, Legal and Environmental) Analysis (Appendix 3), and an Issue Analysis (Appendix 4) all of which were presented to and discussed by the Council at its first planning meeting.

Ms. Everson also interviewed key stakeholders of the College to talk about the Council's current objectives, its overall performance and issues that lay ahead. A detailed report of the outcome of these interviews (Appendix 5) was provided to the Council. At the same time, the College invited all Registrants to participate in a strategic planning survey and although only a small number of Registrants participated, this information was also presented to the Council (Appendix 6).

## MANDATE

During the Council's first planning meeting, particular attention was paid to the mandate of the College as set out in the *Regulated Health Professions Act, 1991* and in Schedule 2 of that statute, the Health Professions Procedural Code (Appendix 7). The reason for this focus was, in part, the emphasis placed by one of the College's key stakeholders on the importance of the Council understanding the College's mandate and remaining 'inside the box'. The Council noted that the mandate as set out in statute provided a very clear set of parameters within which the College should be working, and any objectives set by the Council must exist within these parameters.

## KEY ISSUES AND CHALLENGES

Throughout the materials presented to the Council, a series of themes emerged that articulated what can be considered as the key issues and challenges being faced by the College and its Council.

The first theme related to engaging its system partners, which includes the public, Registrants, naturopathic associations, naturopathic educators, other naturopathic regulatory bodies, and government(s). This engagement needs to focus on two key elements:

- Each system partner needs to focus on their role and know the role of their partners. As such,
  - Questions about expanding the scope of practice of the profession are association matters and should look towards focusing on national alignment. As the regulator, the College's role is secondary and relates to how to adjust the regulatory model to accommodate any change in scope.
  - Good regulation and public protection with the intent of ensuring that we have the right regulatory model in place to maximize public safety while not being unduly hard on the profession is the focus of the College.
  - Best practices and professional innovation area the focus of the educators.
- System partners must collaborate and educate to improve both regulation and the profession.

The second theme that emerged related to the College being a leader in proactive regulation. This includes the importance of several principles:

- Being proactive as an organization and not waiting for things to happen.
- Using what we see and learn in performing our role to the benefit of Ontarians and the profession.
- Finding ways to mitigate risks that can be identified through College programming and in dialogue with our system partners.
- Using our strengths to look ahead to what is likely to emerge in Ontario based on what we see happening in other Canadian and international jurisdictions.
- Maintaining fiscal responsibility and the reputation of the College.
- Incorporating diversity, equity, inclusion and belonging processes and assessing its impact on our work.

## THE MISSION

The first task of the strategic planning process undertaken by the Council was to establish the College's mission statement. A mission statement is intended to be an intersection of three areas:

1. Why do we exist?
2. What is our purpose?
3. What makes us unique?

Since the College has been in existence for some time, the Council considered the current mission statement:

The College regulates Naturopathic Doctors to ensure safe, ethical and competent naturopathic care for the people of Ontario.

Within this statement, Council members could see why the College exists and its purpose; however, it was of the view that there was no indication of what makes the College unique. Looking back to the feedback from stakeholders, the themes that had emerged and the on-going work of the Council, the single element that the Council believed made the College unique was a focus on proactivity. This is in part based on the work of the various committees of the College and efforts towards moving towards a risk-based regulatory framework.

The amended mission statement adopted by the Council was:

The College proactively regulates Naturopathic Doctors to ensure safe, ethical and competent naturopathic care for the people of Ontario.

## THE VISION

The Council's next task was to articulate its vision for the organization. It was noted that the vision statement is based on the description of the ideal destination of the organization and, as such, it should be both aspirational and inspirational.

Again, the Council looked back to the vision that had been in place for some time for its own inspiration:

Public confidence in the practise of Naturopathic Medicine through excellence in regulation.

The Council's discussion focused in three general areas. The first was public confidence as opposed to trust and which idea represented a more meaningful and understandable ideal. The second was on the use of naturopathic medicine, noting that the College does not regulate naturopathic medicine but rather, it regulates naturopathic doctors. The College's influence over the former is indirect, whereas our role in the regulation of naturopathic doctors is far more direct. Finally, it was noted that excellence is a rather nebulous word and as such, there may be many ideas of what success in this area might look like. Every individual's idea of what constitutes excellence may vary from another's perspective whereas effective regulation is somewhat more quantifiable.

The amended vision statement adopted by the Council was:

Trust in naturopathic doctors through effective regulation.

## VALUES

The Council then turned its attention to its values and the values it would establish for the College. Despite the current values having been set some time ago, the Council was generally of the opinion that they remained as true today as when they were first created. It was noted that a couple of the values were closely related and might be combined. It was also felt that principles surrounding equity, diversity, inclusion, and belonging were absent and might be added.

At the request of the Council, the College staff reviewed and brought back to the Council the following amended values statement which was adopted by the Council.

The College of Naturopaths of Ontario will govern the profession and its own activities based on its values. We will:

- Be fair, equitable, transparent, and accountable;
- Act with honesty and integrity;
- Work collaboratively with others;
- Value diversity, foster inclusivity and belonging;
- Accept diverse perspectives and value healthy debate;
- Be respectful and professional;
- Treat all human resources as a key asset;
- Ensure that our standards and processes are evidence-informed;
- Respect the health of the individual and the environment;
- Be courageous, bold, and innovative.

## STRATEGIC OBJECTIVES

Having completed its review of and amendments to the foundational concepts of mission, vision and values, the Council turned its attention to the future and the objectives of the College. As a point of reference, the Council noted that it currently has five strategic objectives and had identified 20 strategic priorities among these objectives. It was noted that the College itself is relatively small in size, as is the profession although the profession's general scope and access to controlled acts was closer to mid-range.

It was at this point that the mandate of the College as set out in statute becomes quite relevant to the discussions. The Council's first priority, whether it is stated or unstated, is to fulfil the mandate set out in the legislation. As a small organization, it must recognize that this priority consumes the majority of financial and human resources available to the organization.

As such, the Council affirmed that when it comes to strategic objectives and priorities, they had to be achievable and within the timeframe of the strategic plan and the priorities had to be real priorities.

The Council returned to the themes it had identified as having emerged from the stakeholder discussions, the various analyses that had been undertaken and from those two sought to craft its strategic objectives.

As noted above, the first theme spoke of engagement, collaboration, meeting identified roles, being proactive, mitigating risk and using the knowledge gleaned from our regulatory activities to benefit all, that is, both the public and the profession. From this theme, the Council crafted the first of its strategic objectives:

The College engages its stakeholders, through education and collaboration, to ensure that they understand the role of the College and trust in its ability to perform.

The second theme that had emerged spoke of being leaders, maintaining the reputation, streamlining processes and a diversity, equity, inclusion and belonging focus. From this theme, the Council crafted the second of its strategic objectives:

Naturopathic doctors are trusted because they are effectively regulated.

## STRATEGIC PRIORITIES

Early on in the planning process, the Council discussed its governance model and how that impacts the strategic planning process. It is important to note that the Council operates on a policy governance model where Council is guided by its policies and, through them, delegates all operational activities to the Chief Executive Officer. Stated in another way, the role of the Council is to set the objectives or ends; however, it is not permitted to set the way or means by which the CEO gets the organization to meet those objectives.

The use of this model by the Council means that its strategic planning must set objective priorities without dictating the details of the College's operations. However, in a very practical sense, if the methods by which the CEO might accomplish the objectives are not palatable to the Council, the Council then needs to provide greater clarity, either through changes to its objectives and priorities or through other means (generally, this means establishing limitations on the CEO in policy).

This meant that for the purposes of setting objectives and priorities, it was helpful for the Council to be able to understand how the CEO interprets the statements from the Council. This is where strategic planning becomes a collaborative effort between the Council and its CEO (and staff).

In this section, the strategic priorities articulated by the Council will be set out. In the next section, the initiatives that the CEO and senior staff identified as supporting these priorities will be articulated. This is not to replace what will come next from the CEO, namely an Operational Plan, but rather to provide context to the Council's planning outcomes.

As noted in the preceding section, the Council has set two strategic objectives for the College. Each of these has several related priorities.

- Objective 1: The College engages its stakeholders, through education and collaboration, to ensure that they understand the role of the College and trust in its ability to perform its role.
- Related priorities:
- The College engages its system partners to further their understanding and trust in the College and the profession.
  - The College engages its Registrants and the public to further their understanding and trust in the College and the profession.
  - The College relies on a risk-based approach to proactively regulate the profession.
- Objective 2: Naturopathic Doctors are trusted because they are effectively regulated.
- Related priorities:
- Applicants are evaluated based on their competence and evaluations are relevant, fair, objective, impartial and free of bias and discrimination.
  - Registrants and the public are aware of and adhere to the standards by which NDs are governed.
  - Registrants are held accountable for their decisions and actions.
  - Registrants maintain their competence as a means of assuring the public that they will receive safe, competent, ethical care.
  - The College examines the regulatory model to maximize the public protection benefit to Ontarians.

These strategic objectives and related priorities will be articulated in policy in the Council’s Ends Statements.

## FROM PLANNING TO OPERATIONS

For both the Council and interested readers (the public, government, Registrants, associations, educational institutions etc.), the question becomes with these new objectives and priorities, what activities will the College be initiating in the coming months and years and which, if any, will end or be changed.

While both human and financial resources have a tremendous impact on these decisions, the following initiatives formed a part of the Council’s understanding as it settled on its new objectives and priorities.

### Objective 1

This objective speaks to engaging system partners to foster an understanding of and trust in the ability of the College to perform its role. The following activities are anticipated to be a part of the task of meeting this objective:

- While the College and its Council has put resources into one-on-one stakeholder engagement, this process has had its ebbs and flows. The College will put a renewed effort into supporting these engagement process.

- Although one-on-one stakeholder engagement is important, there becomes a point at which engaging all stakeholders in a single process fosters a broader understanding of roles, issues and concerns. In this light, the College will foster the development of a System Partners Forum to bring everyone together and in focus.
- The College has been working on engagement of Registrants and the public for some time. One initiative, the Mentoring Education Program (MEP) has proven less effective than desired while another initiative, the In Conversation With (ICW) series has proven highly effective in bringing Registrants and the public to the conversation and engaging in dialogue about the ends and means of regulatory initiatives. ICW will continue while the MEP will be wound down.
- The College has been committed for some time to developing a risk-based approach to regulation. The purpose of this has been and remains to use our existing process to identify risks to the public and to work with stakeholders and the profession to mitigate these risks. The College's efforts in this area will continue and with greater focus:
  - Risk-based data collected by the College through its regulatory processes will be used to augment the Quality Assurance Program.
  - A new regulatory education program will be developed that will focus on providing education to the profession and interested members of the public on critical health care issues, the regulations and the standards of practice.
  - Finally, our regulatory guidance program will be augmented to provide greater outbound information rather than simply responding to telephone calls and emails received.

## Objective 2

The second objective and related priorities set out by the Council speak to the public having trust in Naturopathic Doctors, in part because they are effectively regulated. In part, the focus is on effective regulation; however, it is also about communicating the effectiveness of our regulatory model to the public and stakeholders. The following activities are anticipated to be a part of the task of meeting this objective:

- All regulatory processes need to be relevant, fair, objective, impartial and free of bias. While the College will be incorporating a diversity, equity, inclusion and belonging review process for its regulations, standards, policies and procedures, particular attention will be paid to the examination process with the desired outcome of streamlining these examinations to remove any unnecessary burden and duplication.
- Ensuring the public and Registrants are aware of the regulatory requirements and are in a position to incorporate those into practice in a practical way will be the focus not only of the ICW series, which is continuing, but also of the new educational programming noted above.
- The largest effort in this area will be focused on examining our current regulatory model to maximize the public protection for Ontarians. During the process of establishing the College, the emphasis was placed on minimum specifications, that is, getting those elements of the regulatory model that were necessary to allow for proclamation of the *Naturopathy Act, 2007*. A great deal of effort could not be placed on considering alternatives to such things as the classes of registration or the ability to specialize. Given what we have learned, both from other Colleges and from our own experience, now is the time to start contemplating ways to both augment the benefit of regulation while eliminating any unnecessary burden placed on the profession.



## NEXT STEPS

With the Council adopting both this strategic plan and the necessary policy (Ends Statement Policy), the next steps for the College is to set out a three year operational plan that sets out how these objectives and priorities will be met as well as three year operating and capital budgets that support these initiatives and the continued operation of the College.



The College of Naturopaths of Ontario

## **COUNCIL OF THE COLLEGE STRATEGIC PLANNING 2022**

### **Phase 1 – Project Initiation (May 2022)**

- Identification of necessary background information
- College to provide information to consultant

### **Phase 2 – Environmental Scan (May 2022)**

- College senior staff create SWOT analysis
- College senior staff create PESTLE analysis
- Identification of key issues surrounding
  - Evolution in self-regulation, including risk-based regulation and changes to the RHPA.
  - Opportunity to strengthen existing relations and form new ones.
  - Implications of governance reform.
  - Issues and opportunities related to transparency, accountability, and public trust.
  - Implications of performance measures expectations.
  - Regulatory implications of emerging trends/practice in naturopathy.

### **Phase 3 – Stakeholder Interviews (June 2022)**

- Consultant will develop interview guide based on key themes identified in environmental scan.
- Consultant will meet with/interview stakeholders (OAND, CCNM, MOH, OFC).
- Information collected will be reviewed with senior staff.
- Consultant and senior staff will develop Strategic Planning Survey.

### **Phase 4 – Registrant & Public Consultation (July 2022)**

- Registrants will be invited to complete the on-line SPS.
- Public Representatives (volunteers) and members of the public will be invited to complete the on-line SPS.
- CAG members can be included in survey (no meeting until the fall of 2022).

### **Phase 5 – Report to Council (August 2022)**

- CEO, with support from the Consultant, will develop a report on all work done to do, including environmental scan, learnings from stakeholder interviews and survey results.
- Will be shared with the Council in preparation for Council Planning Meetings.

### **Phase 6 – Council Planning Meetings (September/October 2022)**

- A series of 3-4 half-day meetings of the Council will be held in September and October where Council will discuss the key issues presented.
- Council will debate and establish its priorities and desired outcomes for coming 5 years.

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- Council may also discuss various strategies to support the achievement of the outcomes. These will both inform the CEO on possible approaches as well as identify any potential changes to the Executive Limitations Policies.

#### **Phase 7 – Development of Strategic Plan and revised Ends Policies (October/November 2022)**

- Based on the outcomes of the meetings, the Consultant with the support of the CEO will develop draft revisions to the ENDS statements and ENDS Priorities policies of the Council.
  - These will be presented to the Governance Policy Review Committee at its meeting in early November 2022 for initial review and feedback.
- Based on the outcomes of the meetings, the CEO with the support of the consultant will develop a draft formal Strategic Plan.

#### **Phase 8 – Council sets Strategic Directions (November 30, 2022)**

- At its meeting on November 30, 2022, the Council will be asked to formally approve:
  - The ENDS Statements
  - The ENDS Priorities
  - The 5-Year Strategic Plan.

#### **Phase 9 – Turning Planning into Action (December 2022/January 2023)**

- Senior staff of the College will develop a new Operational Plan for the next 5-year cycle that supports the accomplishments of the Council strategic plan and ends policies.
- Senior staff will also develop a Capital and Operating Budget in support of the plan.
- The plan and budgets will be presented to Council on January 25, 2023 for initial review and feedback.
- Final approval will be sought in March 2023

**COLLEGE OF NATUROPATHS OF ONTARIO  
SWOT ANALYSIS 2022**

	Internal	External
<b>Favourable</b>	<b>STRENGTHS</b>	<b>OPPORTUNITIES</b>
	Council demonstrated commitment.	Support of the MOH.
	Good understanding of public interest.	Strong relationship with stakeholders
	Strong Council.	Synergies with CANRA and its members.
	Strong staff leadership and support.	Leadership within HPRO
	Strong legal support.	Cost sharing with other regulators.
	Excellent relationship with government.	Engagement programs with profession.
	Progress made in governance changes.	Educational opportunities through CNAR & CLEAR.
	Low staff turnover	
	Strong policies and processes in place.	
	Good on-line systems for processes.	
<b>Unfavourable</b>	<b>WEAKNESSES</b>	<b>THREATS</b>
	Small size of profession.	Perception of profession among public.
	Limited financial and human resources.	Split within the profession.
	High cost of regulation.	Radicalization of profession.
	Media exposure of regulation.	Risk of civil disobedience.
	Public's lack of understanding of regulation.	Potential for change to regulatory model.
	Profession's misunderstanding of College.	Increasing oversight, straining resources.
	Performance of prior regulator.	Ability to obtain and retain volunteers.
	Volume of work.	Perception of profession within government.
	Inability to address external discipline and investigation delays.	Increasing number of complex investigations. Increasing number of disciplinary matters.
	Limited availability of third-party providers for innovation or cost savings.	Government's lack of understanding/ consultation.
	Inability to dedicate time and resources to adequately demonstrate in oversight reports how well the College performs.	Inability of elements of the profession to place the public interest ahead of profession self-interest.
		Staff and volunteer burnout.
		Societal changes and stresses.
		Profession under economic strain.
		People leaving the profession.
	Slow growth in new Registrants.	
	Regular changes to education program.	

**COLLEGE OF NATUROPATHS OF ONTARIO  
PESTLE ANALYSIS**

	<b>POLITICAL</b>	<b>ECONOMIC</b>	<b>SOCIAL</b>
1	Government increasing oversight.	Inflation and economic downturn.	Anti-public health measures
2	Government lack of understanding and consult.	Cost of regulation	Public/media perception of the profession
3	French language services.	Low income levels of the profession	Anti-vaccine sentiments.
4	Changes to governance structures	Cost of retaining staff.	Aging population.
5	2022 election outcomes	Job seeker's market increases salaries.	Anti-racism, anti-discrimination initiatives
6	Desire of Auditor General to oversee colleges.	Costs of investigations and discipline increasing.	Engagement of stakeholders.
7	Equity, diversity, inclusion and belonging		Increasing competition among health professions
8			Changing societal expectations of the profession.
9			
10			
	<b>TECHNOLOGICAL</b>	<b>ENVIRONMENTAL</b>	<b>LEGAL</b>
1	Inherent tech risks, i.e. telemedicine	COVID-19 resurgence	Fairness Commissioner.
2	Electronic communications.	Public health measures	College Performance Measure Framework.
3	Increasing demand for on-line services	Scope of the profession in other provinces.	Seeking injunctions.
4	Internet dependance.	Changes in scope of other professions.	Demands of disciplinary hearings.
5		Staff stress and burnout.	Lawyers (except our own).
6		Small volunteer base	Updates to governing legislation.
7		Competing stakeholder priorities.	Human Rights (complaints, accommodations, accessibility, EDI)
8		Change to office structure (working from home, hybrid and new space coming)	
9			
10			

COLLEGE OF NATUROPATHS OF ONTARIO  
ENVIRONMENTAL SCAN - KEY ISSUES IDENTIFIED

**Evolution in self-regulation**

- Movement towards risk-based regulation
  - Development work & related costs
  - Cost of implementation and management
  - Desire of system partners to participate
- Changes to the RHPA
  - Split between Council and committees
  - Competency-based appointment process
  - Need for greater public participation (non-OIC)
  - Need for greater profession participation
  - Continued development of volunteer program

**Relationships**

- De-valuing of HPRO
- Need to link with other Colleges directly
- Vulnerability of CANRA
  - Changes in BC will impact
  - Leadership changes in Alberta
  - Ontario left carrying the ball

**Transparency, Accountability and Public Trust**

- Legislative limits are impacting transparency
- Accountability through OFC, Auditor General, French Language Commissioner strong probability
- Public trust is fleeting and not likely attainable (any one of 26 Colleges, at any time, can negatively impact this)

**Performance Measure Implications**

- CPMF is setting the course for the future
- Extensive work required to implement changes and report on outcomes
- Cost implications in development, implementation and in reporting

**Emerging Trends in Naturopathy**

- Split within the profession is likely to worsen
- Anti-establishment, anti-allopathic approach
- Challenges to regulator, i.e., ignoring investigations, discipline orders.
- Costs in regulation will continue to escalate as issues become more complex.



The College of Naturopaths of Ontario

## **STRATEGIC PLANNING**

### **Issues and views from STAKEHOLDER CONSULTATIONS**

Stakeholder outreach is both a crucial and valuable step in strategic planning. To support the College's current planning initiative, the following 10 stakeholders were interviewed representing six organizations. These interviews were conducted by Carolyn Everson, an external consultant between June and August 2022.

- Ministry of Health and Ministry of Long-Term Care
- Ontario Association of Naturopathic Doctors
- Canadian College of Naturopathic Medicine
- Ontario Fairness Commissioner
- Canadian Alliance of Naturopathic Regulatory Authorities
- Health Profession Regulators Ontario

The key issues and conclusions raised by these stakeholders have been summarized and categorized as follows:

- A. Why Planning? Why now?
- B. Strengths of the College
- C. Challenges the College faces
- D. The evolution of self-regulation
- E. Opportunities and priorities for consideration
- F. System partnerships and relationships
- G. Emerging trends in Naturopathy

Please note that all comments in "*italics*" are direct quotes.

#### **A. Why planning? Why now?**

Stakeholders encourage CONO to be clear on their reason for planning and its purpose.

1. *I query Andrew and his counsel and staff team - why the need for strategic planning because their mandate is clear? You are governed by legislation that tells you a) who you are, b) what your job is, which is to protect and promote public interest and make sure that your registrants are providing high quality safe care, c) your processes for complaints, the quality assurance program you must have, and how you go about disciplining your members and the kinds of disciplinary measures that are taken against your members should it come to that are all laid out for you? So my challenge, to Andrew in the team would be strategic planning to what end?*
2. *It should be more about what does your work plan look like over the next three years? What are your priorities going to be? Strategic work planning - not so much about*

*redefining who you are as an organization. Where do we want to be in three years? - recognizing you're pretty contained in terms of what you can do and what your mandate is. So for example, by the end of three years, we're going to reduce the amount of complaints we have by 25%? I'm making that up. Or how we're going to make sure that our standards of practice are crystal clear. We're going to hold education and training sessions for our members or registrants that highlight what is appropriate behavior and what's not appropriate behavior. Or we're going to develop a robust quality assurance program that's going to deter/detract from the various behavior.*

- 3. Just stay where you are, do everything wonderfully. Find the best ways you can to document in a way that people will read it. ... and stay below the radar of the current government. ..., you have your core functions, those don't change, right? They're laid out. (Don't allow for) ...bias or pressure being felt and acted upon by other groups. So no association pressures, employer pressures, that kind of thing.*
- 4. I would say that all regulators are in a place right now where they're assessing the impacts of the COVID 19 pandemic, which challenged the efficiency of their processes including their registration process.*

## **B. Strengths of the College**

Many recognize CONO, and its team, as a leader and model regulator.

- 5. I adore Andrew - he has done some great things. The team there is absolutely outstanding, and he does not have an easy job. I recognize that and my colleagues in the ministry recognize that as well.*
- 6. They have wonderful publications, I'm on their list - I see their calls to have members of the profession contribute to focus groups and to ask questions of the practice advisor. I think more of those kinds of educational tools will be really, really helpful to the profession to help understand what the regulator's job is, what it's there for, and that they too can contribute to what that looks like. I see some good things coming out of college with respect to seeking volunteers, contributions from its members.*
- 7. The purpose of self-regulation is to make sure that there's high quality, competent, safe care being provided. And when you do that is you adhere to the standards, the policies, the bylaws, the guidance that is provided by the college and you act within your scope of practice. And when you're not doing that, the college is legally obligated and required to take action. So in this respect, I would say the college has done a tremendous job at being able to ensure that the public is well protected. I also think the College does a commendable job at making sure that where individuals are exceeding the scope of practice, and/or contravening the policies and standards, the bylaws, the regulations of the college, that it is handled in a very professional and very diplomatic way. My branch has been very, very impressed with the expeditious (manner) with which some very sticky issues have been dealt with.*
- 8. I know that Andrew went through stuff to start, like, I know, it was hard. Andrew does very well. He is an expert in regulation. Yes. An expert. Which is a good thing for the college. They absolutely benefit from it. People listen to him around regulatory issues. Well respected. Super, super helpful and smart for him to do that.*



9. *So keep what you're doing, you're doing great. You're the model. You are getting it out there and communicating well.*
10. *Andrew is on top of all of it, he really has a phenomenal grasp of what it takes what's needed. He is so clear thinking which is such a treat. He takes a very complicated topic and makes it crystal clear.*
11. *The other piece about him is that we all can look say three steps forward and he can look seven steps forward and then can backtrack and determine what decision are we making right now that might have a negative impact. I'll be really honest with you, I rely on him. If I'm sort of torn between this and that, I will call him and ask can I run a scenario by you? Just to talk it through with him because he has that vision. As part of their planning, CONO needs to make sure that they have him until he's absolutely ready to retire because he is an invaluable resource. And he is an amazing human being. And he's just a really open-minded guy. He's also got the leadership skills to keep his team moving forward. I've always respected his work but having had the opportunity last five years to interact with him on so many different things, I realize just how lucky they are to have him.*
12. *We look to Ontario as our guide. So oftentimes, when, when I'm looking for strategic planning goals for us, I'm looking to see what Andrew and his team have been doing there. There's very little that I see that that I could recommend that they do or that they change. Andrew and his team make time to work with us to help us to answer our questions. The time they give us is phenomenal. And I would hope as any part of their strategic plan going forward, they would always make sure that there's a line item for them to continue to collaborate so positively with their resources and their input. Not just for me, I think I could speak to the other jurisdictions as well.*
13. *Our sense is that this is a well-run regulator. It's a relatively new one, compared to others. It has moved up the learning curve quite quickly. We've had an opportunity to meet with Andrew Parr collectively and I would say that he is one of the more innovative registrar's and CEOs we've encountered, you know, very practical, very thoughtful. For example, I thought their last annual report was interesting. And it had a quite a provocative preamble that Andrew put together, which is why are we doing an annual report in this format, it's useless, because it's backward looking. And the statistics are meaningless, which I must say resonated with me because we do the same sort of work. And we are even hampered in terms of not being allowed to use any graphics in government.*
14. *Andrew and the registration committee have been great - They've made incredible leaps and strides in terms of registration in very short period of time. They are one of our better regulators that I think we are looking at, you know, they've got some best practices that would be worth sharing.*

### **C. Challenges the College faces**

Increasing awareness and understanding of the role of the regulator continues to challenge CONO. As a result, some recognize a reliance (over-reliance?) on the Registrar.

15. *Self-regulation is fairly new - recognizing it's been five, seven years now. Ish. Under the Regulated Health Professions Act, 2015. I think there's still some adjusting that needs to be done on the part of the profession. I wouldn't say the regulator because the regulator knows what its job is. But, I think, the profession and the membership in that regulator need to fully appreciate and come to understand what it means and what a privilege it is to be regulated and to be self-regulated.*
16. *We have seen, with some of the public complaints and discipline cases, the kinds of challenges with respect to professional practice that the College is dealing with. Also, the approaches taken by the advocacy organization, the professional association, don't necessarily demonstrate a fulsome understanding of what all of this means. I don't know how to say it. Other than that.*
17. *I think there needs to be a bit more maturing of the profession. (What we see in other professions...) they've had a lot of years under their belt. So they've worked out these frictions, they understand what their jobs are, their roles are, and more importantly, their members understand. I think part of the challenge with this profession to be truthful is that it came from the drugless practitioners act, where the rules, the procedures, the policies, the regulations, and all that surrounded that were not as stringent as they are now.*
18. *When you have naturopaths or formerly known as drugless, practitioners from the old regime, being teleported into the new regime, where the old regime really didn't have a whole lot going on in terms of safeguards and standards and complaints and discipline in the way they have it now. Some may perceive that the college is overly burdensome, is overly strict. This is something they have to deal with.*
19. **Reliance on the Registrar:** *With all the changes in the shift to risk-based regulation, and all the rest of it, is there's a huge reliance on your registrar. Part of what can come out of good strategic planning is strengthening understanding - so that you're not so reliant on a strong Registrar. The way you can help to take that burden off is to make sure you have strong team members. (Remember) one thing we also evaluate in the college performance measurement framework is, what is the team in the college doing and how is it supporting its leadership? Who are the people surrounding the registrar? And are those people successful? And do they understand their roles? And are they competent enough to be able to execute those roles? Is there regular review of job specs? Is there regular review of performance? Are they doing the things that they're supposed to be doing? Are they set up for success? Are the President and Vice President knowledgeable? Are they just there as figureheads?*

#### **D. Leadership in/ Evolution in self-regulation**

As highlighted below, stakeholders expressed differing views on a shift to risk-based regulation. Many recognize the leadership that CONO has provided in supporting this evolution.

#### **Evolution in regulation towards risk-based regulation**

20. *I think we have a very good hint as to what the previous government and now incoming government thinks about oversight generally. We established the Health and Supportive Care Providers Oversight Authority, which is a new authority, which takes a risk-based approach to how we provide oversight in the province. It's less onerous, less cumbersome, it does allow for other professions to add be added to it over time. Of course, we're looking at personal support workers right now. Could currently regulated professions be added to it? Possibly. Could unregulated professions be added to it? Possibly.*
21. *I think if we were to look at the budget that was tabled just before the election, a lot of time and care and effort was spent on health human resources... so perhaps a new Health Human Resources Plan for the province that will quite possibly include naturopaths.*
22. *Some will have an easier time (moving to risk-based) for sure. Some would say right now, I'm not even sure why they're regulated? They want to have so many risks. So, certainly more for naturopaths and others. I think it's great to move into risk-based regulation. And the right touch stuff is kind of still part of that.*

#### **Governance modernization**

23. **Readiness:** *I know the college already made a submission to the past government on modernization, I think they need to be ready to set themselves up for success and be ready to say how quickly a consultation or reforms would be made. This is all to say without knowing specifically where we're going - there does need to be a state of readiness, whereby once the government decides this is where we're going, the college is receptive and ready to come along with us. If they can be as nimble as possible, as responsive as possible, and come to the table with solutions.*
24. **Timely decision-making:** *Council is going to have to work in different ways and figure out how it can make expeditious decisions, timely decisions, whilst still adhering to the legislation. Are there ways that the college can think about how it makes its decisions without having to wait for a quarterly council meeting? Are there processes or policies that could put in place to help it make decision making expeditious? For example, one of the challenges we have collectively is that there are requirements for a 60-day circulation of regulations, then after that, it will go back to the next regularly scheduled council meeting for approval. Are there ways the council can meet more frequently? I would offer this to all colleges. This is not specific to naturopaths. I would say that there have got to be ways in which there can be more expeditious decision making so that God forbid, if we had to pick up the phone and say, Andrew, you're going to need to amend this regulation, there is no time to wait until the fall - it needs to be done in three months. What do you need to be able to make that happen? So it's about timing. It's about how do you get council approval? It's about the role of the executive.*
25. **Efficiency.** *I think that this profession and others need to (recognize) it's a small regulator. Relatively small, when you compare it to the big fish in the ocean, like the physicians and the nurses and the dentists. Furthermore, there are 26 Health regulatory colleges, that the Ministry of Health is responsible for. And there have been initiatives in Western Canada to shrink the size, the number of health regulators and to amalgamate*

them. Regulators need to **first think about consolidation** and **then second about back-office efficiency** where they retain their own identities but they work with other people (“...ologists”) to kind of integrate what are generic similar exercises. So I think now that Ministry of Health is moving out of the COVID chatter and there's a new minister- this could move up the chain of priority. I would say maybe a moderate possibility that will get will happen over the next four years.

26. We have now had the opportunity to see all the health regulatory colleges reports on how they've assessed themselves according to the College Performance Measurement Framework. There are some very novel ideas embedded in those reports that the ministry and a working group use to showcase best practices. If the College hasn't already done, so it may wish to consider looking at many of the regulatory colleges, reports that are on their websites that that identify where they're going and the kinds of things they've done in this space. Also the ministry's Summary Report of the college performance measurement framework is on our website, which highlights some of the best practices around how colleges conduct their business. Now, those range from everything from how do you register internationally trained individuals? And what kinds of supports do you provide to them, to what the new graduates need to know and how do we make good decisions? How do we demonstrate we're acting in the public's interest? What are the kinds of materials that we put together for our counsel that are transparent that are on our website? How does the public know we're making good decisions, and what goes into those decisions, a lot of those, what we would call exemplary practices or commendable practices are highlighted. And I would say not just looking at the College of Nurses, but across the spectrum of regulators, because no matter how big or how small, how new, or how old, there are some commendable practices that I think all the colleges should be looking at.

## **E. Opportunities and priorities for consideration**

Stakeholders encourage the College to consider the following priorities.

### **Internationally trained graduates:**

28. I know the College has already made some significant gains with respect to the qualifications needed for registration, particularly where you are internationally trained. The pandemic has highlighted for all of us that the processes that all our regulators have, including CONO, are very cumbersome They're very time consuming. They're unwieldy. And quite frankly, they're not helpful. This is going to be a significant focal point. We've made amendments to the Regulated Health Professions Act pertaining to registration to streamline some of those processes. We're very interested in how can we make seamless the transition for internationally educated individuals to come to Ontario into practice, presuming they're educated and qualified. We know that our supply is desperate for certain professions, we know that there are bottlenecks at the regulatory colleges, this one included, with respect to how we register people, how timely (is the

process), and how cumbersome processes are. This is something that the College should be focusing on. I know the College has been thinking about that, because I just received a package from Andrew today.

29. The office of the Fairness Commissioner is constantly looking at registration practices of colleges, to see whether they're impartial, transparent, open and fair. And whilst the College of Naturopaths of Ontario has not necessarily been named as needing to improve, there's always (value in looking at) how are we registering both domestically trained and internationally trained individuals? This should be a focus.
30. We are looking to CONO to position itself as a leader by providing us with good feedback, some suggestion on how regulations might be drafted how they could be positioned.
31. The government is increasingly paying more attention to the work of professional regulators particularly with respect to internationally trained applicants from immigration, through settlement, to enhancing skills, registration, licensure and then employment. So regulators need to make sure that their processes are efficient as possible. And in that respect, as I read the annual report, of the Naturopaths, there are four tests in addition to assessing credentials and making decisions on equivalency. That's a lot of stuff that takes place from point A to point B. So while I cannot predict the result of this exercise. I know the current government is very interested in making this process more efficient.
32. All regulators are going to need to look at their processes and their relationships with third party service providers to do assessments to make sure that these processes are as efficient as possible. And I would say, to jettison steps in that process that don't particularly add value that are artifacts, and that just serve as barriers. So I think it will be a healthy exercise. We have developed the risk and foreign compliance framework, and the naturopaths are a low-risk ranking, which means we will not, comparatively speaking, be paying too much attention to them –they will have some annual reporting that they are required to provide to us, but we do not see them as a problematic regulator.

### **Scope of Practice/ Examinations/Speciality practice**

33. I know that there is some interest, not necessarily part on the part of the college, but on the professional association for **expansions in scope of practice**, whether that is something that will come to fruition, I couldn't say.
34. The Ontario naturopathic profession that has something like 26 standards of practice, under CONO. This is the highest level in Canada and Canada has an extremely high level compared to other countries. We've already got a great scope of practice and we would like to continue to look at that because broadening of scope allows for collaboration- limitation of scope, prevents collaboration with other healthcare professionals. And when there's collaboration with other health care professionals, the public is the most protected.
35. So if I was a patient, and I visited a naturopathic doctor in Ontario, and then I moved to Nova Scotia, and then I moved to BC, and then I moved to Yukon, it would be completely different in terms of the ability to access the scope of care. So it's not the

same. It's different, although some of it may be similar. Some have certain ability to do certain controlled acts and others you don't. And it's no different in the US as well, where scope for naturopaths are evolving.

36. What can we do that makes us more uniform nationally? There are places where all jurisdictions could try to prompt regulatory change or legislative change. To align. To align more closely with each other.
37. It's been a long lively discussion about whether it's a regulator job or the association's job to look to broaden the scope of practice for naturopathic doctors. It sounds like an association type of question, rather than a regulator type function. But historically, it's the regulators that interact with the government to effect scope change. Because it's the regulators who are going to regulate that scope. I think the work we do through CANRA will help inform each individual regulator about what they could change – but we need to come to an agreement as CANRA. (For example) there could be restrictive activity practice, requiring additional certification. And then we go back to our respective jurisdictions and attempt to effect change, which doesn't happen fast. I love Andrew, and Erica, who have been working with us on our current project. I'd love to see CONO have this focus (identified) as part of their strategic planning and therefore budget for more resources to be available.
38. I think we also need better collaboration and communication between different jurisdictions for the opportunity to see if we can get consistency, I think it helps measurably with patient care, because you could have consistent action in the Yukon that would be the same as in Nova Scotia or in Ontario, So as they look at scope, and discrepancies, for instance, between BC and Ontario, I think it's useful to, to see if there's a way to, to get more consistency. Its infusions and lab tests and also prescribing. Prescribing in BC looks quite different. They have an exclusionary list. (Ontario's?) an inclusionary one. There's been requests from the Association to update that - I think that process itself is worthy of some exploration.
39. There was an issue brought forward by maybe one of their committees, but maybe it was staff driven, and there's no way to know, which is about redefining the core competencies of naturopathic medicine. And everybody calls it naturopathic medicine. And CONO proposed to remove the word medicine. Which drove the profession crazy. And they didn't see it as their job to explain why, what the benefits are, etc. Or what their thinking was, so there was naturally a combative element. And this gets back to open communication. That is not just defensive communication between our two organizations.
40. Every few years, the naturopaths will get very alarmed. Are they trying to limit our practice? We don't want our regulatory body, the public doesn't want a regulatory body to limit our ability to practice our skill set, because that goes against public protection. They are talking about the term naturopathic doctor. Are they trying to limit us to make our regulation of us easier - because naturopathic doctors are so diverse?
41. We try to make sure that patients get what they need. Because every patient has diverse needs. If you look at research and history you'll see that there are certain segments of the population that are more at risk of being mistreated in the public health care system, for example, the LGBTQ the BIPOC community. For example – there is research that shows that you need to understand that certain lab tests are going to be a little abnormal

*in that segment of the population, because they are diverse. This is where the naturopath shines, because of our broad scope.*

- 42. So if we look at the scope of naturopathic medicine in Ontario, with regards to lab testing, prescribing and some of the other activities, you know, are there opportunities to allow for more care, more assessment to be offered to patients. I think this has been something that the Association has been trying to deal with.*
- 43. CONO could be developing a framework to allow naturopathic doctors to specialize. We've got people in our naturopathic profession who are paying out of pocket to know quite a bit more about cancer - about adrenal - about sports and injuries, chronic pain. Also Environmental Medicine, which is very leading edge to understand the chemicals that are being put into our environment and the impact on the public in their hypersensitivities. We're looking at electromagnetic hypersensitivity, which the World Naturopathic Federation is also looking at.*
- 44. I would love to see CONO focus more on (developing) specialization examinations and leave the entrance exam alone. We already have a really good one in place. It's been working for years.*
- 45. NPLEX is the exam, that all Ontario naturopaths used to write until CONO created its entrance exam. NPLEX has been doing this for a very, very long time. They do environmental scans. They've got their transparency in their examination process nailed down. Their audit, they got it. They're the experts. I don't have the confidence in this new exam, to make sure that CONO is bringing new registrants in that are adequate. I haven't seen the data. I haven't seen the transparency. What was their motivation? And that's not just my criticism. I'm not just speaking today on my behalf. I spoke to a bunch of naturopaths before I met with you. I'm sure they put a ton of work into that exam. Instead build on what they have developed to create specialization exams.*
- 46. So there is history on this one is... I think there were some challenges with regards to jurisdictional needs and Ontario needed to move forward with its own exam. Its based on competencies that the College has established, and they share with partners like ourselves. (Always...) engagement with various partners, tends to make the process more robust... And again, I don't know, to what extent, CONO is doing that. But there probably is an opportunity to talk about what the competencies could look like, and how examinations can be structured.*
- 47. So I would say it's a fairly new exam. They brought out I think they did clinical first. So they did the clinical exams first, and then they brought up a biomed, which is, in the normal order of things, you have biomed, and then clinical. And so, initially, there was some significant hiccups, which I would say, is probably not unexpected the new exam, we had a significant failure rate. And we talked about it and I know the passing rate has now improved.*
- 48. Just a word on OSCEs - there are two major regimens that regulators use to attempt to assess the competence of applicants provided they have the requisite education training, one would be knowledge-based examination, and the second particularly in the health sector, are these clinical examinations which allow evaluators to, to observe how candidates actually interact with clients. For some health regulatory colleges offering their objective structured clinical examination virtually, as opposed to in person provided*

*mixed results. So, I mean that that needs to be top of mind for any regulator, because some observers will say that these pandemics and emergencies constitute the new normal.*

49. *So the OSCEs, I would say are under review by a number of, of health regulatory colleges, partially because they in a way constitute a perfect storm ... from a public health perspective (e.g. difficulty when a need for physical distancing) in a pandemic. The second reason they are under review is they are expensive and there are issues about the validity of those tests. The physiotherapists recently abandoned them.*
50. *A growing area within the profession is the area of **specialties**. In the US there are a growing number of them. And I think sooner or later that question is going to come to CONO, what is the regulators stand on speciality practice? Or maybe it's already come to the regulator. It's something that the not just CONO but regulators across North America, US and Canada will have to address.*

#### **Other**

51. *(Another priority for CONO might include...) **how you're spending your funds**. I think you're gonna be scrutinized. Not only because of the economy, members are going to want to know where their dollars are being spent more than ever. Some colleges reduced their fees during COVID. So, I think they should be really cautious on how dollars are being spent and how you're recording that.*
52. **Keep your reputation intact**. *As long as they're doing their work well. You can handle people throwing things at you. When you are doing well. You can defend yourself. As a regulator, this is not the place to be creative. ...don't do anything where in my mind, you're taking unnecessary chances within your college, you don't need to recruit members, you don't need to find extra revenue sources. Don't be getting advertisers for your magazine. Don't have a website with the ads on it. Don't do any of that. You don't want to be known for having the best tic toc videos. You do want people to understand what the regulator does and what people find the regulator when they need one. So, it does makes sense to have a public facing website that lets the public know what a regulator does. That's important to share.*
53. *Also, find ways to **streamline your complaints process**, and to find ways to **ensure that you are looking at indigenous health** and that you're **looking at anti BIPOC racism**. The sexual abuse of patients, make sure you've got that covered with policies etc. in place. Make sure all those things are taken care of in your college.*
54. *Diversity, inclusion, anti-racism, are very big themes that are percolating throughout all organizations. It's complex for a regulator, because you have your applicants to the profession that you're interested in, you've got members of the profession, and you've got staff in your organization. And one flashpoint, I think, is the collection of race-based data: There seems to be a reluctance on the part of some regulators to dip their toes into it, but it is viewed as important.*



55. *I've been hearing from recent graduates about **the cost** to register, to inactive license. Cost is always top of mind for practitioners, because in addition to registering they also pay for insurance and they have to pay for the practice.*

### **System partnerships and relationships**

56. *As educators, we do see ourselves as system partners. How do we position ourselves? How do we fit within the larger healthcare ecosystem? We're all partners, the Regulator has their mandate, the Educator has their mandate, the Accreditor has their mandate. How do we all support growth of the profession, as well as ensuring that we are key players in the larger healthcare ecosystem?*
57. *The healthcare ecosystem has changed significantly. And now, post COVID, the way care is delivered and the way we approach healthcare, is rapidly evolving. So how do we, you know, combine our strengths and ensure that safe, competent ethical care is being delivered. How do we come together to ensure that the graduates that are being licensed are able to play a very prominent role as healthcare members?*
58. *As the ecosystem evolves - we're looking at a world that hopefully is more collaborative and more integrated. I think that certainly was the promise of coming into the RHPA. And I would argue that we've made some fairly good steps forward in terms of, establishing the profession and setting some fairly rigorous standards around that. I think there's opportunity to further, in the interest of the patient, connect in a more profound manner with, with the health care system and with other health care providers. Look for opportunities.*
59. *I think if I'm being honest, Carolyn, the rub is with the professional Association. The professional association has a completely different mandate, it's advocating on behalf of its members, and the interests of its members. I think collaboration is helpful where and when it's required. Recognizing the Association has a very different vantage point, has very different mandate, and gets paid to do different things for its members than the regulator does. There's the rub. I'm not at all suggesting that they need to be working better together. But I'd be remiss if I didn't acknowledge - is there something that the College could do? I think the College has been very tolerant, and patient has been very helpful to the Association when it needs to be. I guess what I'm saying is, it's not lost on me. And the people that I work with that there is sometimes a very big rub there. I wouldn't suggest that there be have to become a better at working together or that Andrew and the team there would need to do anything different. I think, as I said, they're very tolerant, they're very patient.*
60. *Where there is an ability to collaborate, that would be lovely, and maybe there is no ability to do but just want some exploration. Yeah. very least. And at the end of the day, if the answer is, we've looked at this and know, we're quite contented and happy.*
61. *When we consider the role of the Association vs the role of the College, I think that there are good reasons for dividing, you know, professional self-interest from public health and safety. I think over time, the public health and safety mandate will be seen as too narrow. ... I think sometimes associations are way out there. And not credible. I think a*

*college can be credible. I see the College having a role as a catalyst to begin conversations on issues.*

62. *We're definitely each other stakeholders. And by definition, the College and the Association are not necessarily going to be working in the same direction.*
63. *We, the Association, see ourselves sometimes as the interpreter for our members of College rules. One thing that is sometimes a challenge is that the registrants don't always understand what CONO means when they communicate to registrants. They often need additional information. I believe, from CONO's perspective that they don't see it as our role to interpret what they say. But someone has to do it, and we're responsible to our members.*
64. *I think the College sees themselves as having to be - I don't know if strict is the right word - but more strict or more buttoned down or more by the book than maybe some other long-established colleges.*
65. *The only structure we have in place for communication is that we're supposed to have a quarterly meeting between chair of the Council and the CEO. And, and our chair and CEO - obviously COVID is a legit excuse for everyone being up in the air and not doing everything on schedule. And that is our only method of formal communication, although Andrew and I will send each other notes and talk on the phone every now and again about usually about a particular issue. We have willingness to engage more formally and that could be done in several different ways.*
66. *They are not going to, nor should they ask us to sign off on the communications to their registrants. But they would benefit from having those who didn't compose the message, read it to see how it comes across. And (to check) if the message is clear enough. We could play a role there. I don't want to skew this to you know, sounding like everything I want to say today is negative ... But in relation to communications - When we ask questions, it is seen as combative as opposed to, you know, a natural extension of what we should do.*
67. *I appreciate the communication we have with CONO - I've seen a major improvement in the last few years. I've had very pleasant and positive interactions since I've been on the board.*
68. *Sometimes we have to clarify what CONO says to our members, we get questions. ... So, the Association's job very much is to actually help CONO - to represent CONO to our membership. The regulatory body makes sure that our arrogant, irresponsible, unintelligent naturopaths that slipped through the cracks shouldn't be practicing and that they get disciplined for it. Because we don't want that either. But there's a trust issue. ... it's very difficult for our staff members to not be triggered when they're having conversations with CONO because in the early years, a trust issue happened, because the OAND was stuck in a sandwich position between the regulatory body and the protection of their members. That trust needs to be redeveloped. Both the Association and the regulatory body need to continue to work together to gain a more respectful relationship with each other.*
69. *They have put a lot of effort into advertising mistakes or inappropriate words. Though if you looked at the actual risk of a miscue in wording or an inappropriate presentation of a treatment, the risk to a patient's health is virtually nil. And so the profession can be*

*frustrated if this emphasis on how they speak or speak on the web. So I understand that, but I also understand that it's a fine line. We do continually talk to our members about appropriate presentation of things, and what Ad was not allowed, why etc.*

70. *When it comes to responses to consultation processes, naturopathic doctors have always been very forthcoming. And we just want to communicate to CONO that it should never ever be taken as an insult or anything - It is really a plea to communicate openly and on a level playing field. And it's not about ND protection, it's about public protection. At the end of the day, it boils down to scope, it boils down to the fact that we have our skill sets and we have our scope and that scope has been examined robustly since we got under the RHPA. That's entirely understandable. There isn't worry in our profession that our scope may be overly examined and overly analyzed.*
71. *We also have the Federation of Regulated Health Professionals, - the Federation for short. It's a collection of the 30 Health Regulated Professions, all the registrar's and we are a very powerful source. In fact I've never seen Federation so successful. And yes, that organization could certainly be effective in promoting change. The problem is that each individual college lobbies the government for their own needs. So they may not have any objection to a change in scope as it relates to naturopathy, but they may not want to use their government favor asking for it - because they may need something else instead. We have a lot of politics in that organization. And it's not good, bad or otherwise, it's just a fact.*
72. *I think the precedent that's been set in BC and Alberta by the government, proposing to amalgamate various colleges into a super College has had a negative impact on naturopathy - taking us back to that view, well, they can't be very important - they don't even have their own college. They are actually a done deal in terms of legislation but we've been waiting for 18 months or 24 months for the government to indicate when they're actually going to make that move – so it's not practically speaking done yet. I think that the CANRA project toward uniform regulation, uniform understanding of how naturopathic medicine is regulated and that an entry to practice standard is going to eventually - hopefully - be national will help. That's what we're working on right now. That those things provide a respect to naturopathic medicine that will be similar to what was gained by the chiropractors when they implemented the national exam and national service practice. So, I see us moving in the right direction. I think we need to not lose momentum but with the workload of every registrar now there's a very real risk of losing momentum.*

#### **Emerging trends in Naturopathy**

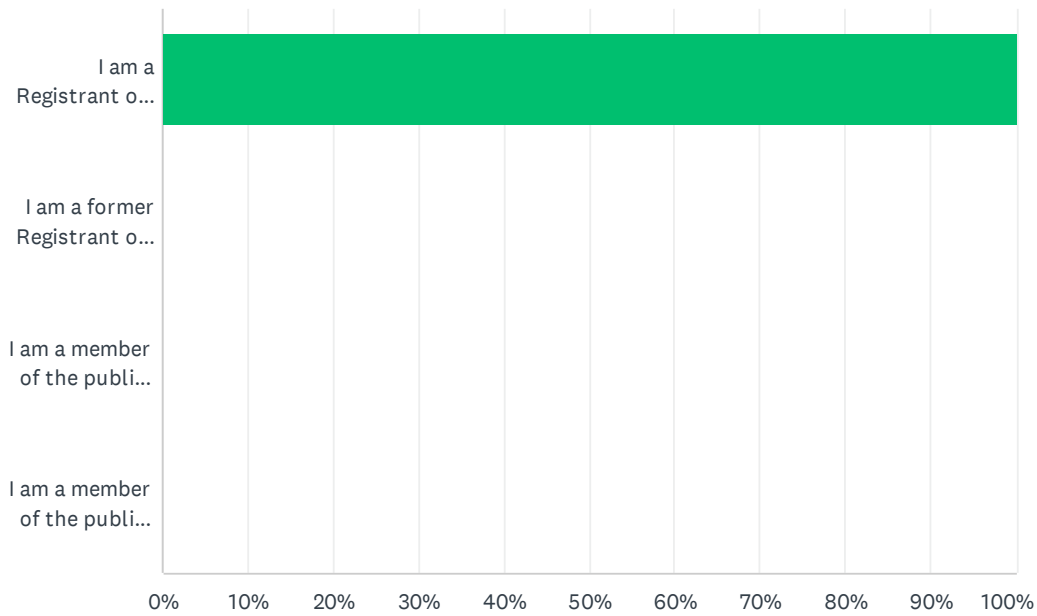
73. *Naturopathic doctors have reputational challenges. As time goes by, the practice is more and more accepted.*
74. *I think there will continue to be a greater acceptance of naturopathic medicine, maybe not all modalities, but naturopathic medicine in general. For a significant part of the population COVID has influenced people's perspective on their health and wellness. I think that over time - and this is not in any way, arguing against public medicine, - but I think that because of pressures on budgets, and a greater understanding of other things that people could do to keep themselves healthy, that there will be more opportunity for*

*types of insurance based on private medicine, or health care. Not for acute care issues, of course, but for keeping people away from the need for acute care, for keeping people well, in some cases, managing chronic diseases. I see the opportunities ahead as getting bigger, and I see the future is bright.*

- 75. I would say there is a respect for and a recognition of the profession as another **opportunity or option for clients to pay** for their health care and to assist them along their healthcare journey.*
- 76. It may take longer but I think the government will move away from lists. And we very much hope that the restrictions of the inclusive list, for instance, changes – e.g. drug lab tests This may create a bit more work for the regulator, if there are more tests that they have to be aware of ... I think an expansion is inevitable.*
- 77. We've got these people who have decided to leave the profession who have our skill set, who decided that it's too difficult and onerous to work under our RHPA regulation, and they're going to do it on their own. Are they leaving because they don't pass the exam? Or they, feel too afraid to practice under regulation, they don't feel that they have a robust enough understanding of. They don't have the trust that they are not going to get a \$30,000 fine or \$10,000 fine for something that they accidentally did. The naturopath enjoyed a lot of freedom in their old regulation. I don't necessarily agree that that was a good thing. I think it's a good thing to have a good strong regulation. I do. And we need to take responsibility for that as naturopaths.*
- 78. I think the profession is very much on the verge of an incredible growth, when you think about how the attitudes of the of the consumer have changed recently. It's a change towards natural options of healthcare and that's what a naturopathic doctor offers.*
- 79. The profession is growing. It's a small profession, but it's growing rapidly. How do we now create that larger ecosystem where we become significant and valuable players?*
- 80. We're at this is a tremendous time for the naturopathic profession. With attitudes changing it's an incredible time to be graduating as a naturopathic doctor.*

### Q1 Please select which of the following applies to you:

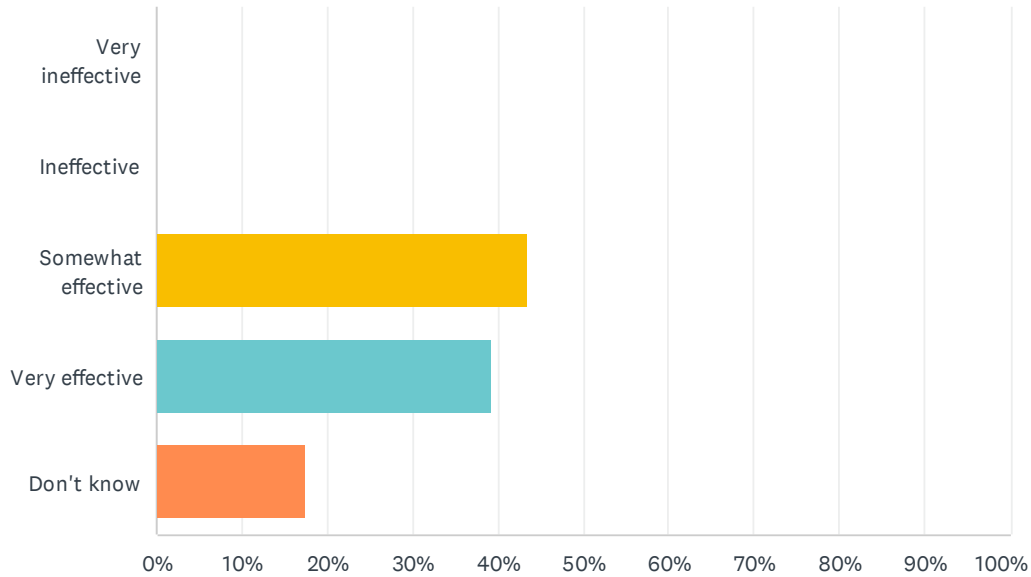
Answered: 23 Skipped: 0



ANSWER CHOICES	RESPONSES	
I am a Registrant of the College in either the General Class or Inactive Class.	100.00%	23
I am a former Registrant of the College.	0.00%	0
I am a member of the public with no involvement with the College.	0.00%	0
I am a member of the public and a volunteer with the College.	0.00%	0
<b>TOTAL</b>		<b>23</b>

## Q2 How effective to you believe the College of Naturopaths of Ontario has been at protecting the public?

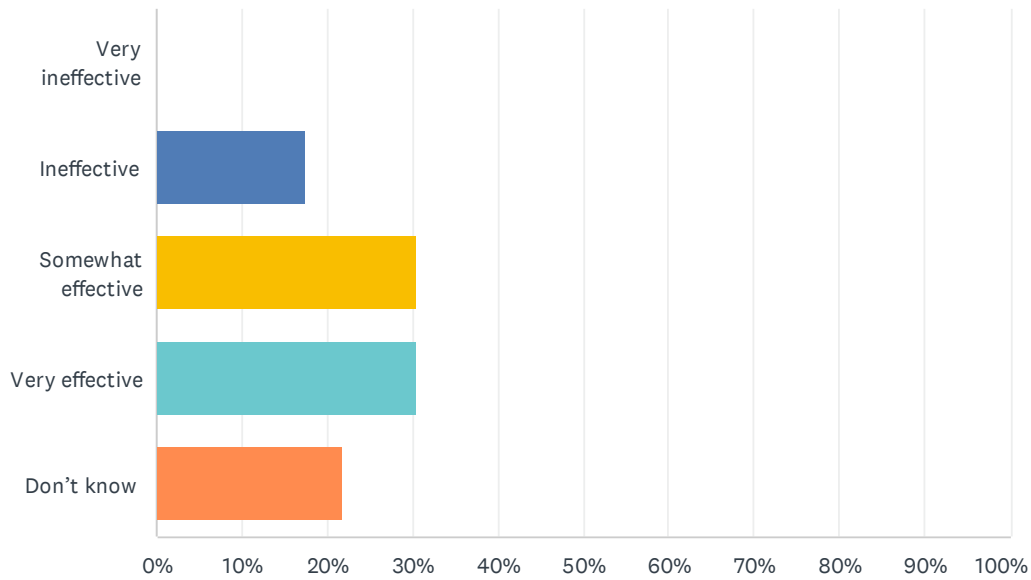
Answered: 23 Skipped: 0



ANSWER CHOICES	RESPONSES
Very ineffective	0.00% 0
Ineffective	0.00% 0
Somewhat effective	43.48% 10
Very effective	39.13% 9
Don't know	17.39% 4
Total Respondents: 23	

### Q3 How effectively has the College earned public trust and confidence?

Answered: 23 Skipped: 0



ANSWER CHOICES	RESPONSES	
Very ineffective	0.00%	0
Ineffective	17.39%	4
Somewhat effective	30.43%	7
Very effective	30.43%	7
Don't know	21.74%	5
<b>TOTAL</b>		<b>23</b>

## Q4 What do you believe to be the greatest strengths of the College?

Answered: 21 Skipped: 2

#	RESPONSES	DATE
1	clear and equitable processes, communication and information sessions, complaints/discipline process	10/18/2022 6:51 PM
2	Timely communications with registrants.	10/15/2022 8:20 PM
3	Effective ongoing communication with its members. Appears to protect the public, however quite vague at times.	10/14/2022 12:19 PM
4	There are measures to correct problems of all sorts in the industry compared to the past drugless board.	10/13/2022 3:45 PM
5	providing standards and guidelines for the profession, providing timely communication through blogs of topics relevant to the practice of naturopathic medicine	10/13/2022 11:45 AM
6	Clear regulations, good communication	10/12/2022 8:08 PM
7	- Unpopular decision to scrap NPLEX, but option to write licensing exam in either English or French is a positive change - Addressing unauthorized practitioners - Website has had some improvements this year in being able to navigate and find needed information	10/12/2022 6:04 PM
8	Very good at carrying out its mandate	10/12/2022 5:20 PM
9	Communication with registrants	10/12/2022 5:00 PM
10	The college investigates all complaints thoroughly. They make sure that the public is involved in various committees and their board. They make it very clear to NDs that their role is to protect the public.	10/12/2022 3:59 PM
11	Clear communication	10/12/2022 2:51 PM
12	The number of volunteers that you have on Committees, and the continuous efforts of College staff of organizing the Committee meetings to keep moving the College forward on it's mandates and goals. The College has also taken a very proactive approach for protecting the public (posting higher level dispositions from ICRC on the public register), ensuring there are enough public members on counsel to represent the public, etc.	9/16/2022 10:10 AM
13	It's staff, especially Senior Management	9/15/2022 10:01 AM
14	Ensuring that registrants are practicing safely. Ensuring laws are upheld	9/14/2022 9:11 PM
15	Attempts to communicate with NDs " conversations with", those .pdfs that show what is ok and not ok for advertising etc	9/14/2022 11:30 AM
16	Making sure that NDs practice responsibly, and have the correct information to do so.	9/14/2022 10:09 AM
17	It seems to be pretty good at keeping members up to date on regulatory changes.	9/14/2022 9:49 AM
18	Thank you for the effort for effective communication with Registrants.	9/14/2022 9:36 AM
19	I believe that the majority of staff are dedicated and kind people who do their best to help members navigate college processes.	9/14/2022 9:29 AM
20	CONO's greatest strength is its ability to rule-by-fear	9/14/2022 9:25 AM
21	Honestly don't know.	9/14/2022 9:01 AM



## Q5 What do you believe to be the greatest weaknesses of the College?

Answered: 23 Skipped: 0

#	RESPONSES	DATE
1	The College's communication that NDs should not discuss COVID/COVID vaccines with patients may have inadvertently resulted in many NDs not communicating MOH public health messaging and directing patients to MOH/public health unit information due to fear of practicing outside of scope. This unintentional silencing of NDs who would have otherwise been strong advocates for public health during the pandemic may have reduced public trust and confidence as well as public safety.	10/18/2022 6:51 PM
2	The College's policies around COVID 19, in particular, stating that treating COVID 19 is outside of NDs scope of practice, has likely harmed the public by denying them early treatment and care for mild to moderate illness, both of which are the most common features of the infection for the majority of people and well within evidence based and traditional naturopathic principles and training to help people with. In addition, it has been known since early 2020 that chronic disease comorbidities fully within NDs scope of care significantly worsen outcomes with COVID 19 and NDs have been barred from communicating about these conditions in reference to the virus and prevention. In barring NDs from communicating with their patients when asked about individual considerations for COVID 19 genetic vaccines, their individual risks and benefits, stressors involved in forced/mandated vaccination, vaccination concerns in pregnancy and in children, and sequelae of vaccines including vaccine injuries, the development of shingles, etc. etc. the College has enabled harm to members of the public.	10/15/2022 8:20 PM
3	Overhead for rent is exorbitant. Vague and inconsistent at times with what the rules actually are. This can be quite confusing for members.	10/14/2022 12:19 PM
4	They do not give clear interpretation of the legislation to members putting the public at risk of poor interpretation	10/13/2022 3:45 PM
5	The image of the college in the eyes of *some* members as punitive / overly restrictive force rather than a collaborative agent for the public good.	10/13/2022 11:45 AM
6	High fees/cost management	10/12/2022 8:08 PM
7	- Punitive fees for making administrative mistakes in dealing and registering with the College. The policies change every few years and it is difficult to keep track and make sure you are doing everything correctly. I believe most Registrations sincerely want to do the right thing but are also scared of interacting with CONO - I do not feel that writing the prescribing authority exam to gain access to a few extra tools/substances that are not covered in this exam protects the public - The amount paid in rent during the pandemic is a mis-use of our registration fees. I understand the rationale of having a building that is accessible to the public; however, CONO regulates all of Ontario. Whether or not something is on the TTC line does not constitute accessibility to Ontarians to contact or interact with CONO.	10/12/2022 6:04 PM
8	Poor communication with the profession	10/12/2022 5:20 PM
9	Excessive overhead costs	10/12/2022 5:00 PM
10	lack of trust from the profession the College governs appeasing the MOH and public health instead of the public interest lack of trust in naturopathic medicine and naturopathic doctors lack of understanding of how naturopathic medicine works trying to fit naturopathic medicine into an allopathic mold that is inappropriate and disrespectful to the profession of naturopathic medicine unhelpful information needed for registrants may be available, but is almost always extremely difficult to find etc	10/12/2022 4:16 PM
11	I think the college can at times be too hard on NDs. I think the public is very bright and knowledgeable these days and it would be great to look at some of the regulations with respect to advertising, testimonials, selling packages, before and after pictures. Fee structure etc that other healthcare providers are allowed to use and NDs are not. In wanting to protect the public, sometimes the college comes across as punitive towards NDs.	10/12/2022 3:59 PM

12	Too restrictive of practitioners expressing themselves, some rules don't make sense re: safety (eg: requiring pharmacy course to rx but including little to no training on how to rx desiccated thyroid, bioidentical hormones)	10/12/2022 2:51 PM
13	Clarifying common misperceptions with Registrants and connecting with the provincial association to address misunderstandings (this may be in part due to the associations not taking a collegial enough perspective).	9/16/2022 10:10 AM
14	Disconnect from the registrants	9/15/2022 10:01 AM
15	The College comes across as intimidating to NDs, striking fear into some. Can feel like the College has only the public interest at heart - which is the point of the College - but seems to be to the detriment of NDs Operating costs too high - College registration fees are cumbersome	9/14/2022 9:11 PM
16	Money management, not being available, being too traditional	9/14/2022 11:30 AM
17	The College does not seem to support and value naturopathic medicine. If your college doesn't seem to support the profession properly, what message is that sending to the public about naturopathic medicine.	9/14/2022 10:09 AM
18	I think abandoning the North American-wide qualification exam and making a new exam specific only to Ontario has done nothing but cut us off from the wider ND community.	9/14/2022 9:49 AM
19	Lack of recognition that protecting the public also means ensuring that the public has access to the healthcare that they desire. Continual restriction of practice and lack of ability for NDs to stay current with trends in healthcare. Punitive tone to members in many communications.	9/14/2022 9:38 AM
20	Too narrow an interpretation of the mandate (i.e. all that protecting the public entails).	9/14/2022 9:36 AM
21	Communication and relationship with members is still poor, although the college has tried to make inroads here in the past year and that is recognized.	9/14/2022 9:29 AM
22	Incompetent senior leadership. The general members of the profession have no confidence in the leadership of CONO. But we would like to.	9/14/2022 9:25 AM
23	Not supporting registrants when we have questions about how to approach something we have questions about. We are ALWAYS directed to reading the regulations (which is what we have questions about) and often this pertains to how to interpret these in order to do our jobs safely and to protect the public. I've often felt like I've rolled the dice and thought "I THINK this is okay..." only because I've received zero guidance aside from "read this section". Helping guide registrants directly helps to protect the public.	9/14/2022 9:01 AM

## Q6 In thinking about the regulatory environment and profession, what do you think are the opportunities that the College has available to it?

Answered: 21 Skipped: 2

#	RESPONSES	DATE
1	Encouraging more effective interprofessional collaboration with other HCPs regulated under the RHPA	10/18/2022 6:51 PM
2	Rethink the COVID 10 policy that blanket statements this important public health issue as outside NDs scope. Allow for there to be significant and validated differences between Naturopathic Medicine and other systems of health care regulated in Ontario, so that the public has access to the full scope, training, and judgement NDs can offer. Remember that many patients have deferred accessing conventional medical care specifically through the pandemic and have been denied care that NDs could have provided, were the regulatory environment more conducive to NDs skills and knowledge being fully expressed.	10/15/2022 8:20 PM
3	I'm not sure how to answer this.	10/14/2022 12:19 PM
4	Set up clear guidelines	10/13/2022 3:45 PM
5	Continue providing relevant and timely resources to support the profession in making good decisions in their practice and business.	10/13/2022 11:45 AM
6	NA	10/12/2022 8:08 PM
7	- NDs have an opportunity to apply our knowledge and skills to help the current healthcare crisis and we are restricted by our Ontario license. Just one example: Our colleagues in BC are able to administer vaccines, for example. Not every ND does which allows for individualized practice. More and more of my patients are without a GP and I am unable to refer for simple/basic tests like ultrasounds or provide vaccines to families that want them, even though I have the knowledge and experience giving IM shots. - Initiate nation-wide registration to allow NDs to practice across different jurisdictions. Engage with other provinces who have not yet regulated NDs so that they can learn from the outcomes and experience of CONO.	10/12/2022 6:04 PM
8	Strengthen the relationship with the profession and make sure they understand the role of the College through more frequent and articulate communication; Continue to analyze the scope of practice to see how changes might benefit the public interest.	10/12/2022 5:20 PM
9	Lower overhead costs by working from home, or amalgamating offices with another government regulatory body	10/12/2022 5:00 PM
10	educating the other regulators and colleges on naturopathic medicine, naturopathic doctors' important role in chronic, long term health and especially regarding the lack of harms to patients compared to iatrogenic injuries from allopathic medicine. There is a tremendous amount of false information and slander put out by numerous sources into the public eye that is left unchallenged.	10/12/2022 4:16 PM
11	The college can become less punitive and more professional in communicating with NDs. The college needs to recognize that the population is changing and needs to change its regulations recognizing that the public is very aware and knowledgeable. Many NDs in Ontario are either moving. leaving the profession or retiring. Many new grads are deciding to either not practice in Ontario or stay in Ontario but not register as an ND because of the fact that they feel CONO us too hard in NDs. Over time there may not be a profession to regulate in Ontario. So best to look at regulations and make changes in a positive way so both NDs and CONO can thrive.	10/12/2022 3:59 PM
12	Provide better training for rx, improving image/relationship with MDs, reducing MDs disparaging NDs	10/12/2022 2:51 PM
13	To invite registrants in to see the workings of the College, and engaging them more, thus becoming collaborators with registrants in protecting the public interest.	9/15/2022 10:01 AM

14	The opportunity to work within the RHPA and government to ensure NDs are using the full scope of their knowledge and skills	9/14/2022 9:11 PM
15	unsure. this is not something you highlight to ND's well.	9/14/2022 11:30 AM
16	I'm not sure what the question is referring to. Opportunities for myself? For NDs in general? For the college?	9/14/2022 10:09 AM
17	I imagine that expanding our scope of practice, particularly in terms of prescribing rights, would be a pretty important one.	9/14/2022 9:49 AM
18	The college has an opportunity to engage more cooperatively in strengthening the naturopathic profession which would result in increased patient care and hence increased public safety. Protecting the public is not achieved by weakening the profession.	9/14/2022 9:38 AM
19	More support for Registrants in their efforts to fill a much needed safety gap in healthcare. (For example, more support in how we communicate informed consent with patients, review safety concerns with patients about care they're receiving from various health professionals, etc.) As our healthcare system transitions through this pandemic, safety is a big elephant in the room, and NDs have far more capacity to support the public here than we are.	9/14/2022 9:36 AM
20	Opportunities? If your mandate is to protect the public, then I don't understand this. The College has made it very clear it is not here to help the profession, but to protect the public. There are a number of opportunities for our profession to assist in public health and other areas that would be in the public interest.	9/14/2022 9:29 AM
21	Unsure how to answer this question	9/14/2022 9:01 AM

## Q7 In thinking about the regulatory environment and profession, what do you think are the challenges or threats that the College is facing?

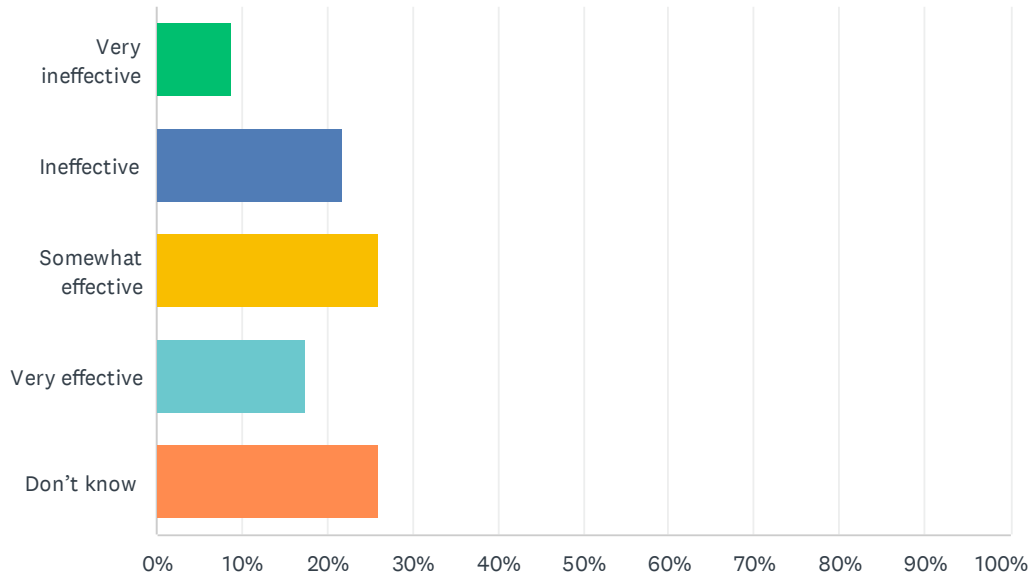
Answered: 22 Skipped: 1

#	RESPONSES	DATE
1	Diversity of naturopathic practice, lack of well developed and published standards of care within naturopathic medicine	10/18/2022 6:51 PM
2	It may be that the College is being influenced by factors such as private/pharmaceutical funding to the Ministry of Health, such that NDs contribution and voices are actually not valued at the level of the Ministry. It is critical that the College understands Naturopathic Medicine and upholds its place in Ontario healthcare, for (not in spite of) its uniquenesses as a profession.	10/15/2022 8:20 PM
3	Opposition from influential organizations such as the OMA.	10/14/2022 12:19 PM
4	Not sure	10/13/2022 3:45 PM
5	Members leaving the profession to work as health coaches (or similar) because they can have more success with less overhead costs. I don't think this is in the best interest of the public or profession and I do think looking at why this is happening is important.	10/13/2022 11:45 AM
6	NA	10/12/2022 8:08 PM
7	- Small # of registrations, relatively large scope of practice	10/12/2022 6:04 PM
8	Changing landscape of the profession	10/12/2022 5:20 PM
9	Loss of registrants due to excessive costs, and regulatory burden	10/12/2022 5:00 PM
10	All the other regulated health professions want to be naturopathic, but they are not. They don't understand the mindset or the health models naturopathic medicine is based on, but they want to pick and choose piecemeal treatments based on algorithms without understanding the process. The modern medical system wants to disintegrate naturopathic medicine and at the same time, assimilate and patent naturopathic medicine's tools. Ethics is not a consideration.	10/12/2022 4:16 PM
11	I think I answered this in the previous question.	10/12/2022 3:59 PM
12	Influence of medical doctors who prefer to limit ND practice	10/12/2022 2:51 PM
13	Registrants who were not a part of the creation of and introduction of the new regulation (2007-2015), and understanding how the College fits within the provincial government framework, see the College as "them" in an 'us vs them' view. Thus, registrants are less likely to collaborate with the College.	9/15/2022 10:01 AM
14	I think the College is perhaps facing threat from the CPSO, or other Colleges, always feeling inferior and like the new kid on the block. What our province would look like if CONO and the other Colleges truly worked together for the BEST possible care for ALL patients	9/14/2022 9:11 PM
15	Educating the public and other governing bodies that naturopaths are regulated and there are safety measures in place because of this.	9/14/2022 11:30 AM
16	Imposing limited and misguided rules - i.e. that NDs can prescribe estrogen but not oral progesterone, which makes us more unsafe and BHRT prescribers.	9/14/2022 10:09 AM
17	I don't know.	9/14/2022 9:49 AM
18	Lack of respect that members have for CONO. Lack of ability to stay current with technology advances and laboratory advances in healthcare. Lack of regulatory support for interprofessional collaboration. The CONO exam has weakened the naturopathic profession in Ontario and has weakened the confidence that existing NDs have with new graduates. The high fees associated with CONO membership - especially when compared to other professions under the RHPA.	9/14/2022 9:38 AM

19	Misperception by the Ministry of our profession's values and capacity to support or improve safety of our public healthcare system. This could include misperceptions around public vs private healthcare, "unproven" interventions that Public Servants might misperceive as unsafe... A College that *only* publicizes the infractions and discipline hearings of Registrants, might perpetuate these myths... more balance is possible, isn't it?	9/14/2022 9:36 AM
20	The profession by and large does not trust the regulator or the CEO. The profession feels that the college can be petty and punitive in cases where it is just simply not necessary. We are a small profession and a small college. If someone has a family emergency and misses their monthly fee because of this and have never had an issue with fees before, there should be humanity in the decisions. Being hard lined and punitive in cases where the public is not in danger puts the profession on edge with the regulator. People are leaving the profession at higher and higher rates and part of the issue is the college and how it manages members. Without members, there is no college and no profession.	9/14/2022 9:29 AM
21	Although I know the College puts regulations and guidelines in place to address this issue, at some point, the media will get a hold of the story that NDs make a significant portion of their income by selling marked-up supplements and lab tests to our patients. This conflict of interest whereby we profit-by-prescribing won't look good when it comes out, because we'll have no defence against it, because it's true.	9/14/2022 9:25 AM
22	Internal frustration	9/14/2022 9:01 AM

### Q8 How effectively has the College been as a leader and innovator in risk-based health regulation and modern governance approaches?

Answered: 23 Skipped: 0



ANSWER CHOICES	RESPONSES	
Very ineffective	8.70%	2
Ineffective	21.74%	5
Somewhat effective	26.09%	6
Very effective	17.39%	4
Don't know	26.09%	6
<b>TOTAL</b>		<b>23</b>

**Q9** The purpose of strategic planning is to set the future goals of the organization within the overall mandate for the organization. The College's mandate is to: a) Ensure that those entering practice have the knowledge, skill and judgment to practice safely, competently and ethically. b) Set and maintain the standards of practice of the profession. c) Ensure the on-going competency of the profession. d) Hold the profession accountable for its conduct and decisions. Given this mandate, what should be the overall objectives of the College?

Answered: 19 Skipped: 4

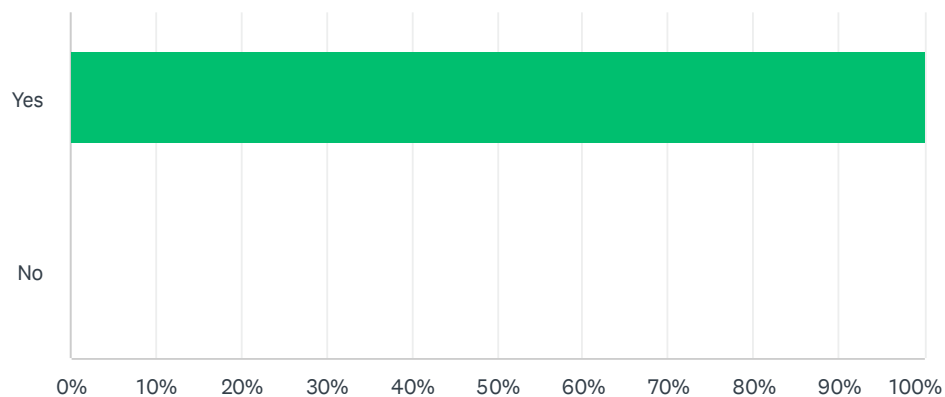
#	RESPONSES	DATE
1	no change	10/18/2022 6:51 PM
2	Be accountable to the registrants as to Its conduct and decisions. Provide for its mandates in the most cost-effective manner possible.	10/15/2022 8:20 PM
3	As above.	10/14/2022 12:19 PM
4	Currently there is a real need for better communication on clinical standards of ND and not just the words or communication we use in marketing	10/13/2022 3:45 PM
5	NA	10/12/2022 8:08 PM
6	- Please consider our scope and what is necessary to provide Ontarians access to good care. Our MD colleagues are inundated. - We need more 1-on-1 guidance on how to apply regulation in complicated situations. We need to be able to email or call someone who is going to give a straightforward answer about if something is allowed and not refer us to the guidelines that we have already read or a nebulous answer. We are trying to balance patient care and needs with what is permissible by our licensing board.	10/12/2022 6:04 PM
7	Continue current standards while looking at cost efficiency	10/12/2022 5:00 PM
8	ensure that naturopathic doctors are fairly and properly supported by the college in order to practice effectively, without fear of retaliation or targeting by the College. Stop allowing our scope of practice to be reduced. This decreases the number of tools we can use to help people and therefore decreases the chances of success. Or maybe that is the goal? Stop demeaning naturopathic doctors and naturopathic medicine by condoning the negative slander by the government, by the news, by journalists, by random people with issues. If your job is to govern the profession, the College should at least be able to acknowledge the vast and tremendous amount of knowledge and value that naturopathic medicine and its practitioners, hold. You can regulate the profession without working against it. Ensure that Naturopathic Doctors continue to be self-regulating and continue to be based in ethics and jurisprudence. Never again threaten our autonomy or medical choices or allow any other body/regulator or anyone to do so. This is a violation of the highest sort. Our own ethics and jurisprudence places the most importance on informed consent. Stop trying to define naturopathic medicine with terms that are inapplicable and inappropriate. Stop trying to fit the profession into a model that doesn't suit the profession. Learn more about how naturopathic medicine actually works. Stop supporting the educational institutions in their transitions to allopathic models. It is a great disservice to the profession and the public. All of this is a disservice to the public. If ND's can't do their job properly, how are they supposed to do their job? Stop participating in the destruction of naturopathic medicine as a profession.	10/12/2022 4:16 PM
9	Do all those things but in a way that is less threatening and punitive to NDs.	10/12/2022 3:59 PM
10	Continue to apply the College's mandate, and also be innovative and a leader in its role as a health regulatory body.	9/15/2022 10:01 AM



11	Ensuring access to a variety of CE courses that help NDs to maintain their knowledge, skill and judgment. While holding the profession accountable, maintaining a feeling of approachability, so NDs feel that they can come forward with questions or concerns	9/14/2022 9:11 PM
12	Translating to government and the public your role in doing the above, so that the public attitudes towards the profession is more positive. I think keeping in mind longevity of the profession is key as well, we need practice to be sustainable for clinicians so that we can maintain regulation ( because of the cost associated with this) .	9/14/2022 11:30 AM
13	Do the above openly and fairly	9/14/2022 10:09 AM
14	It's unclear to me what the difference between a mandate and an objective should be.	9/14/2022 9:49 AM
15	Ensuring the ongoing competency of the profession involves ensuring that NDs have the ability to stay current - this used to be a strength of the profession, but since 2015 it has become the greatest struggle as a practicing ND. Yes, NDs should be held accountable for their decisions - - but when we are limited in our ability to perform the right tests or recommend treatments that we know would be helpful, it doesn't help. The CONO exam does not ensure competency as proven by the lack of correlation to NPLEX (which has been around for over 4 decades) and the ongoing poor pass rate. Either we have major major problem with CCNM or with the CONO exam. Either way, the optics of poor pass rate is terrible and the lack of focus on identifying and addressing the problem is not okay.	9/14/2022 9:38 AM
16	From my rather narrow lens, I feel confident in the College's actions so far regarding a, b, and c. Objectives regarding holding the profession accountable, could be more rounded out: Being held accountable also means acknowledgement for the good outcomes where public safety is concerned. (There must be a way to do this without crossing the line into a Public Relations objective!)	9/14/2022 9:36 AM
17	I think the complaints committee does a good job, but as mentioned above, the interaction with members needs to be improved.	9/14/2022 9:29 AM
18	I agree with the mandate as-is. The objective for the College should be to continue this, but become more efficient and friendly to your members. Change the CEO and move to a virtual-only office.	9/14/2022 9:25 AM
19	Ensuring the registrants have the support they need (and providing support when asked!) to do their jobs safely and effectively.	9/14/2022 9:01 AM

Q10 Since 2016, the overall goals of the College have been: a) Being a leader in accountability for naturopathy in Ontario. b) Ensuring that stakeholders understand the role of the College and have confidence and trust in the College to perform its role and cooperate to ensure effective regulation of the profession. c) Being a leader in openness, transparency and cooperation. d) Efficiently and effectively regulating the profession by relying on a risk-based approach to regulation. e) Governing efficiently and effectively. Do any of these goals remain relevant today and looking ahead over the next five years?

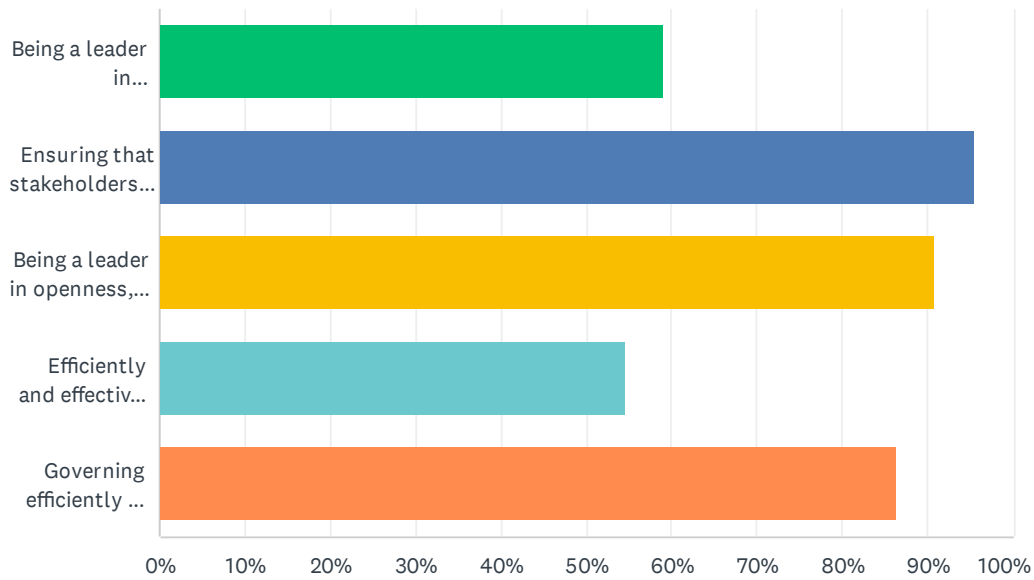
Answered: 21 Skipped: 2



ANSWER CHOICES	RESPONSES	
Yes	100.00%	21
No	0.00%	0
Total Respondents: 21		

## Q11 Which of the goals remain relevant looking forward

Answered: 22 Skipped: 1



ANSWER CHOICES	RESPONSES	
Being a leader in accountability for naturopathy in Ontario.	59.09%	13
Ensuring that stakeholders under the role of the College and have confidence and trust in the College to perform its role and cooperate to ensure effective regulation of the profession.	95.45%	21
Being a leader in openness, transparency and cooperation	90.91%	20
Efficiently and effectively regulating the profession by relying on a risk-based approach to regulation	54.55%	12
Governing efficiently and effectively	86.36%	19
Total Respondents: 22		

## Q12 Are there any specific initiatives in your opinion that the College should undertake to achieve the overall goals of the organization?

Answered: 18 Skipped: 5

#	RESPONSES	DATE
1	N/A	10/18/2022 6:51 PM
2	1. Eliminate the unnecessarily expensive lease space on John St. 2. Consult the profession on their capacities to treat and help people prevent COVID 19. 3. Consult the profession on a policy that outlines NDs roles in any future emerging public health issue/emergency/pandemic. 4. Ensure professional freedom of speech and freedom of conscience for NDs when acting on behalf of their patients. 5. Develop a policy that invokes NDs unique contribution, rather than declaring them non-essential, in any future public health emergency or pandemic. 6. Consult the profession on how to earn their trust as the regulator, as the membership is the College's chief stakeholder.	10/15/2022 8:20 PM
3	I'm not sure.	10/14/2022 12:19 PM
4	We need other regulators to know what CONO is doing to gain trust in the health care industry	10/13/2022 3:45 PM
5	No	10/12/2022 8:08 PM
6	No	10/12/2022 5:00 PM
7	Make your assessments on actual data from actual naturopathic patients, not extrapolations, not inferences, not based on other professions. How many patients have actually been literally harmed by naturopathic medicine provided by naturopathic doctors?	10/12/2022 4:16 PM
8	I think CONO should treat the profession with respect. Know that NDs as a whole are a positive contributor to health care. Educate the other colleges in our level of training and education so we can work more collaboratively. In communication with NDs, sound more professional and less threatening.	10/12/2022 3:59 PM
9	Improve pharmacy training to cover those things NDs can/do rx, reduce disparagement of NDs by MDs, improve ND access to lab testing	10/12/2022 2:51 PM
10	I feel strongly that the College could govern more effectively, and potentially reduce complaints, by collaborating more with its registrants. I understand that the College's role is to protect the public interest, but if the College was able to engage registrants more, they could work together to protect the public.	9/15/2022 10:01 AM
11	not sure	9/14/2022 9:11 PM
12	Looking at a different model of rent/location, especially now we are in such a hybrid model world wide. Making language more friendly - you use such legal jargon to talk to NDs, keep that for legal documents. Work closer with the OAND. Continue to repeat what you "actually do" and WHY its better for us NDs for you to exist	9/14/2022 11:30 AM
13	No	9/14/2022 10:09 AM
14	I think getting rid of the Ontario exam and cooperating with the rest of North America would be a good place to start.	9/14/2022 9:49 AM
15	I would not consider CONO a leader in openness, transparency and cooperation - at all. CONO seems to apply a punitive approach to regulation; not a risk-based approach. If NDs are considered a stake-holder, I would question whether or not trust is high. As NDs we have had to defend our scope numerous times in the last couple of years. Regulation by weakening the profession is not respectful, patient-focused or necessary.	9/14/2022 9:38 AM
16	I think the college can do better to achieve the goals it already has, particularly cooperation with other stakeholders and the members.	9/14/2022 9:29 AM
17	Those initiatives are excellent. Their delivery and implementation have been lacking, in my	9/14/2022 9:25 AM

opinion. Especially "Governing efficiently and effectively". I would score CONO a 1 out of 5 on this goal. It's time for new leadership.

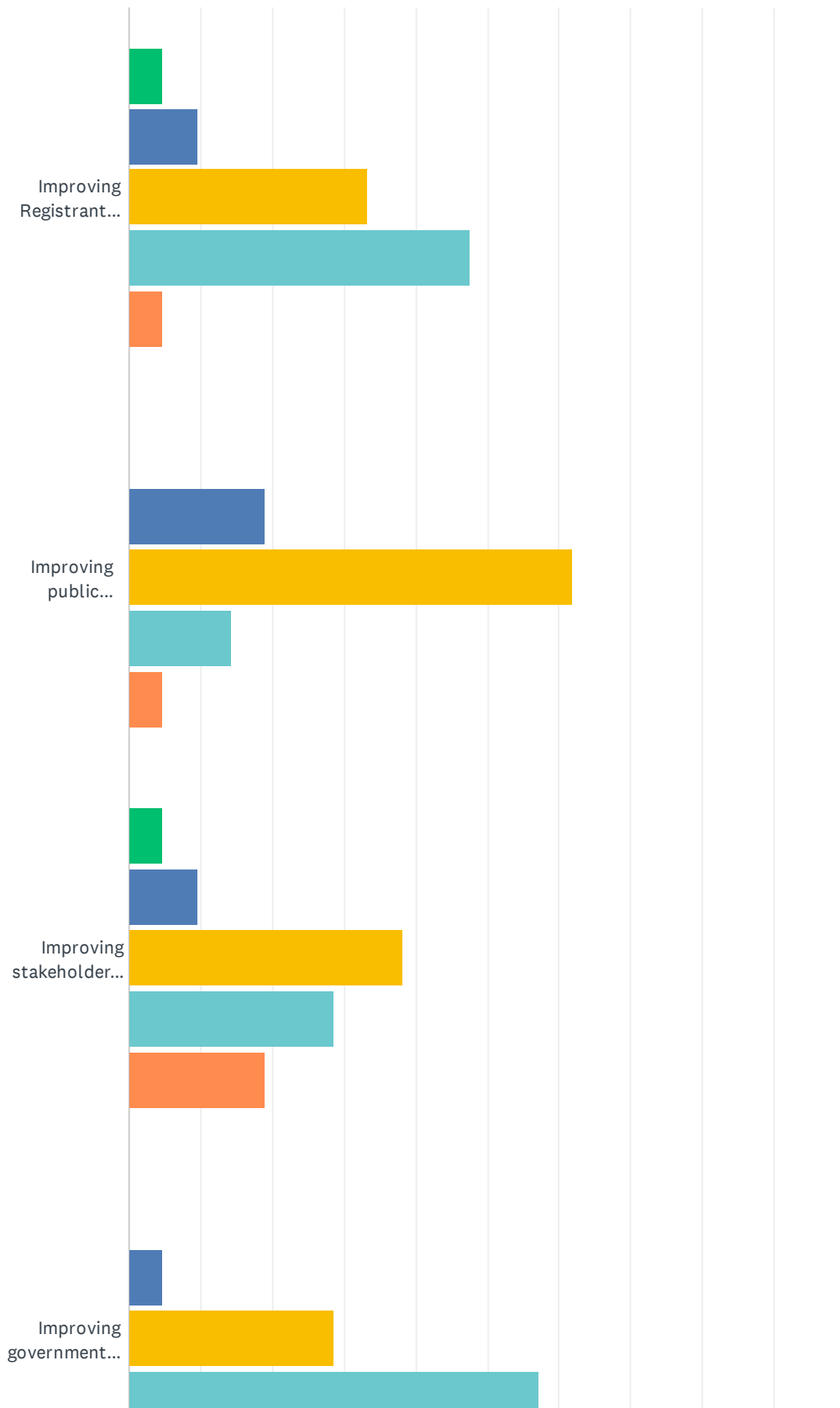
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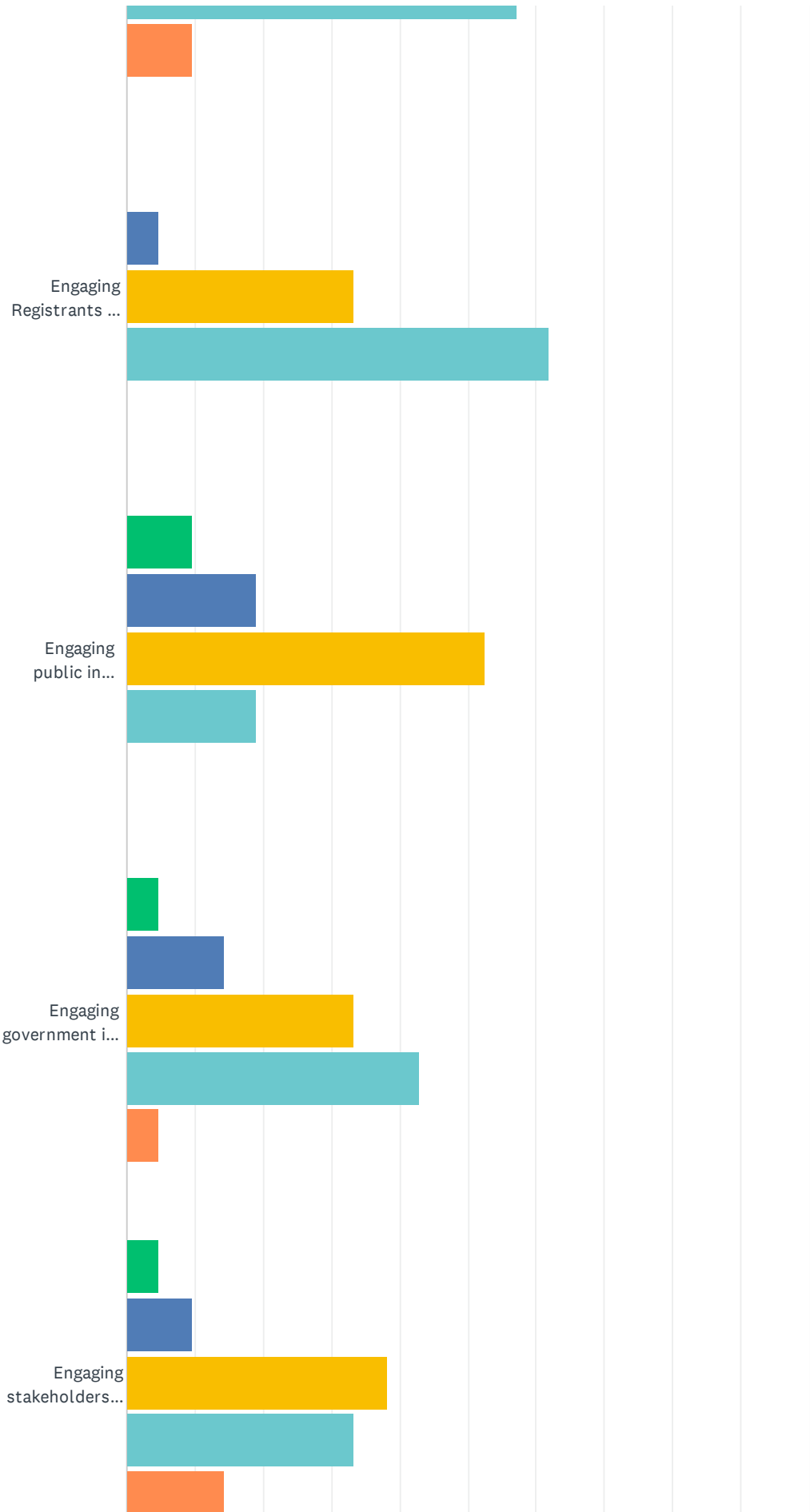
18	Support registrants with transparency, openness, and cooperation so that we can do our jobs safely. Answer our questions when asked. Move to a more affordable location so that our fees aren't paying for John street.	9/14/2022 9:01 AM
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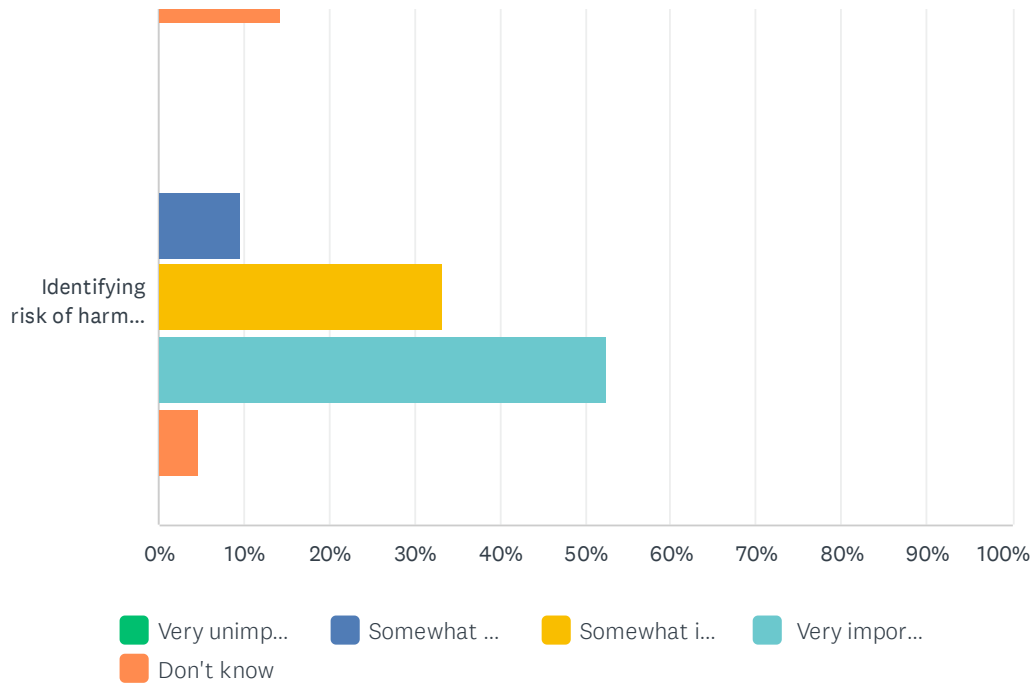
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### Q13 Please indicate how important each statement is in your opinion:

Answered: 21 Skipped: 2





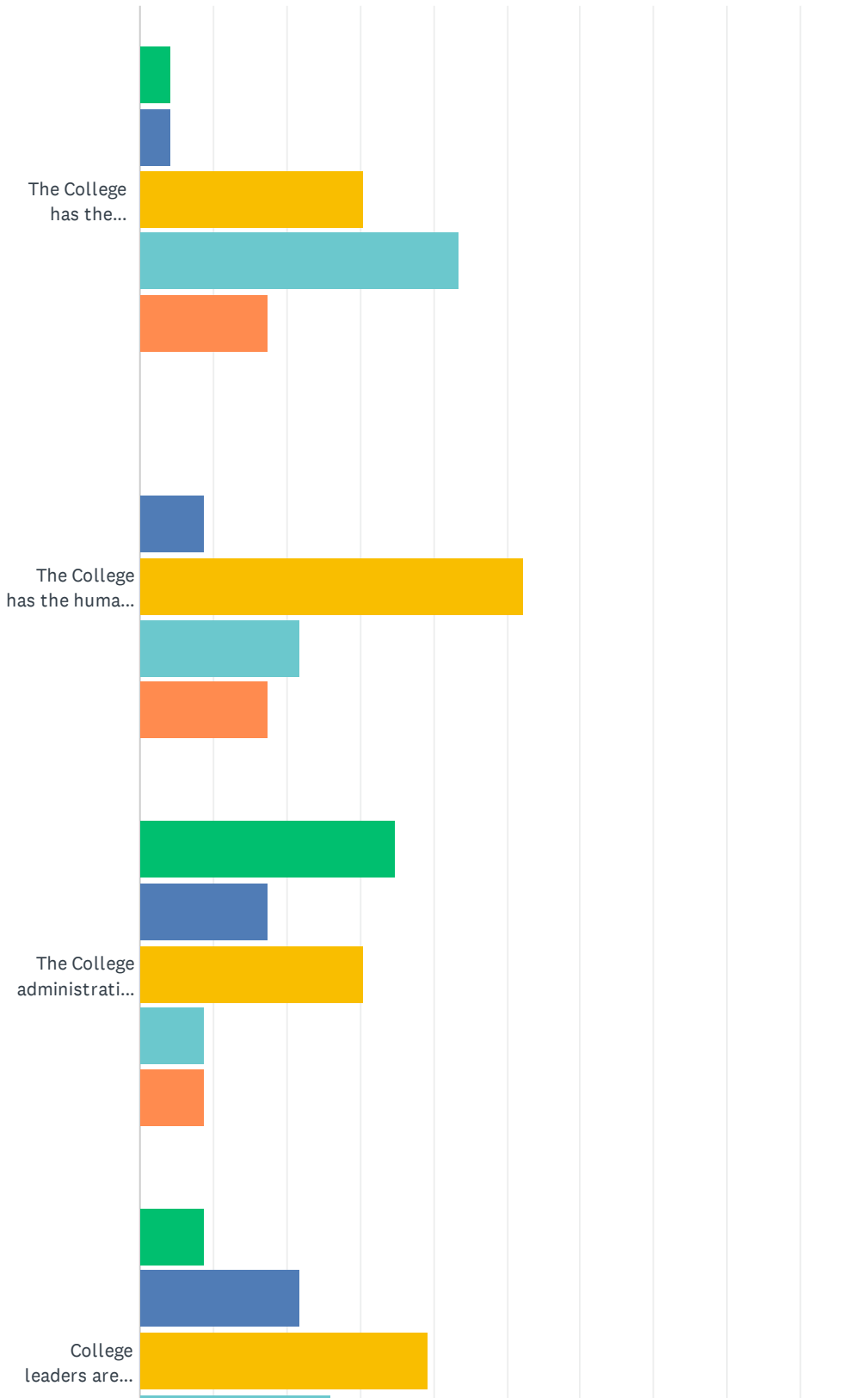


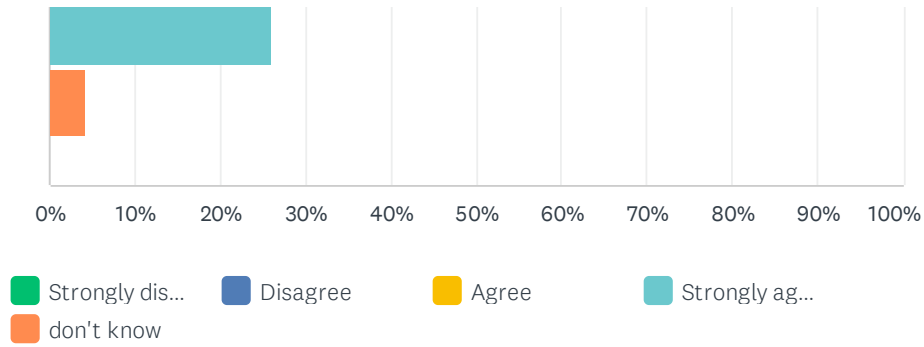
	VERY UNIMPORTANT	SOMEWHAT UNIMPORTANT	SOMEWHAT IMPORTANT	VERY IMPORTANT	DON'T KNOW	TOTAL
Improving Registrant engagement.	4.76% 1	9.52% 2	33.33% 7	47.62% 10	4.76% 1	21
Improving public engagement.	0.00% 0	19.05% 4	61.90% 13	14.29% 3	4.76% 1	21
Improving stakeholder engagement.	4.76% 1	9.52% 2	38.10% 8	28.57% 6	19.05% 4	21
Improving government engagement.	0.00% 0	4.76% 1	28.57% 6	57.14% 12	9.52% 2	21
Engaging Registrants in processes.	0.00% 0	4.76% 1	33.33% 7	61.90% 13	0.00% 0	21
Engaging public in processes.	9.52% 2	19.05% 4	52.38% 11	19.05% 4	0.00% 0	21
Engaging government in processes.	4.76% 1	14.29% 3	33.33% 7	42.86% 9	4.76% 1	21
Engaging stakeholders in processes.	4.76% 1	9.52% 2	38.10% 8	33.33% 7	14.29% 3	21
Identifying risk of harm to the public	0.00% 0	9.52% 2	33.33% 7	52.38% 11	4.76% 1	21



### Q14 Please rate your level of agreement with the following statements about the state and use of College resources.

Answered: 23 Skipped: 0

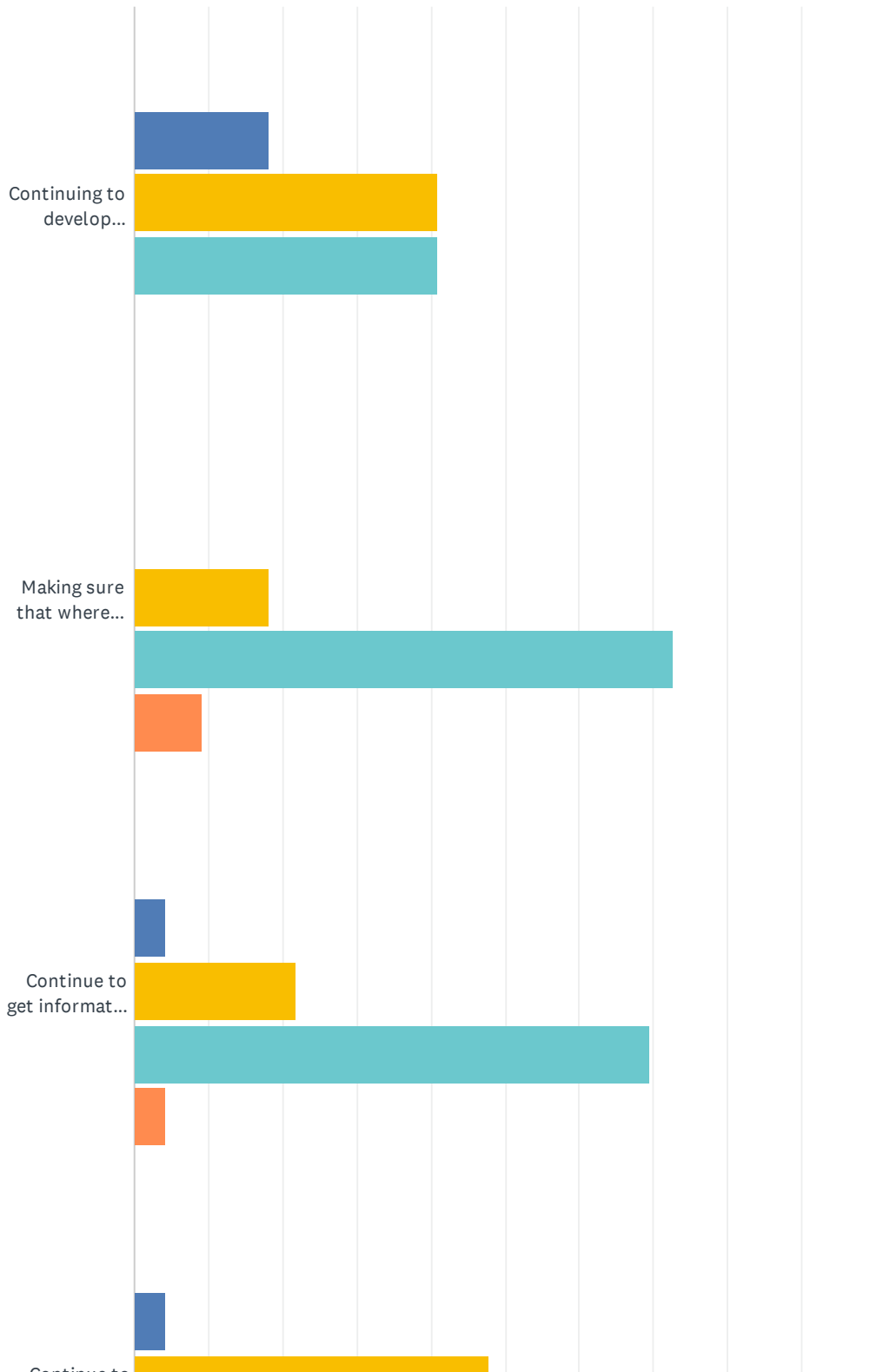


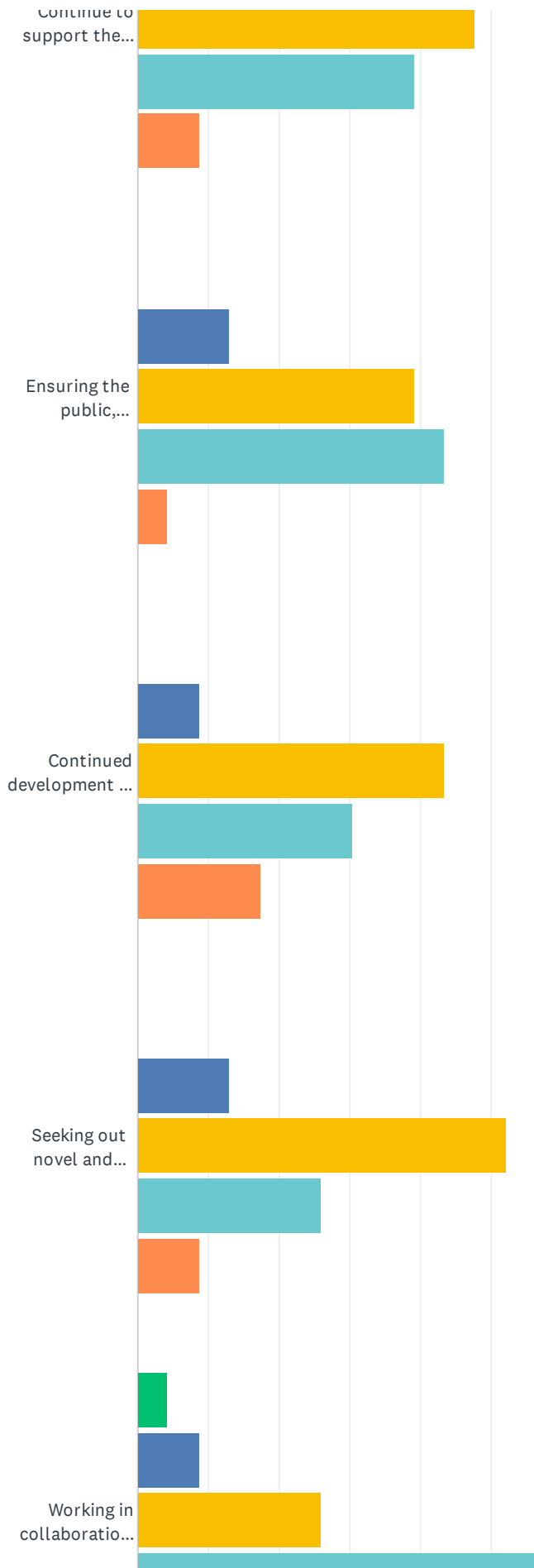


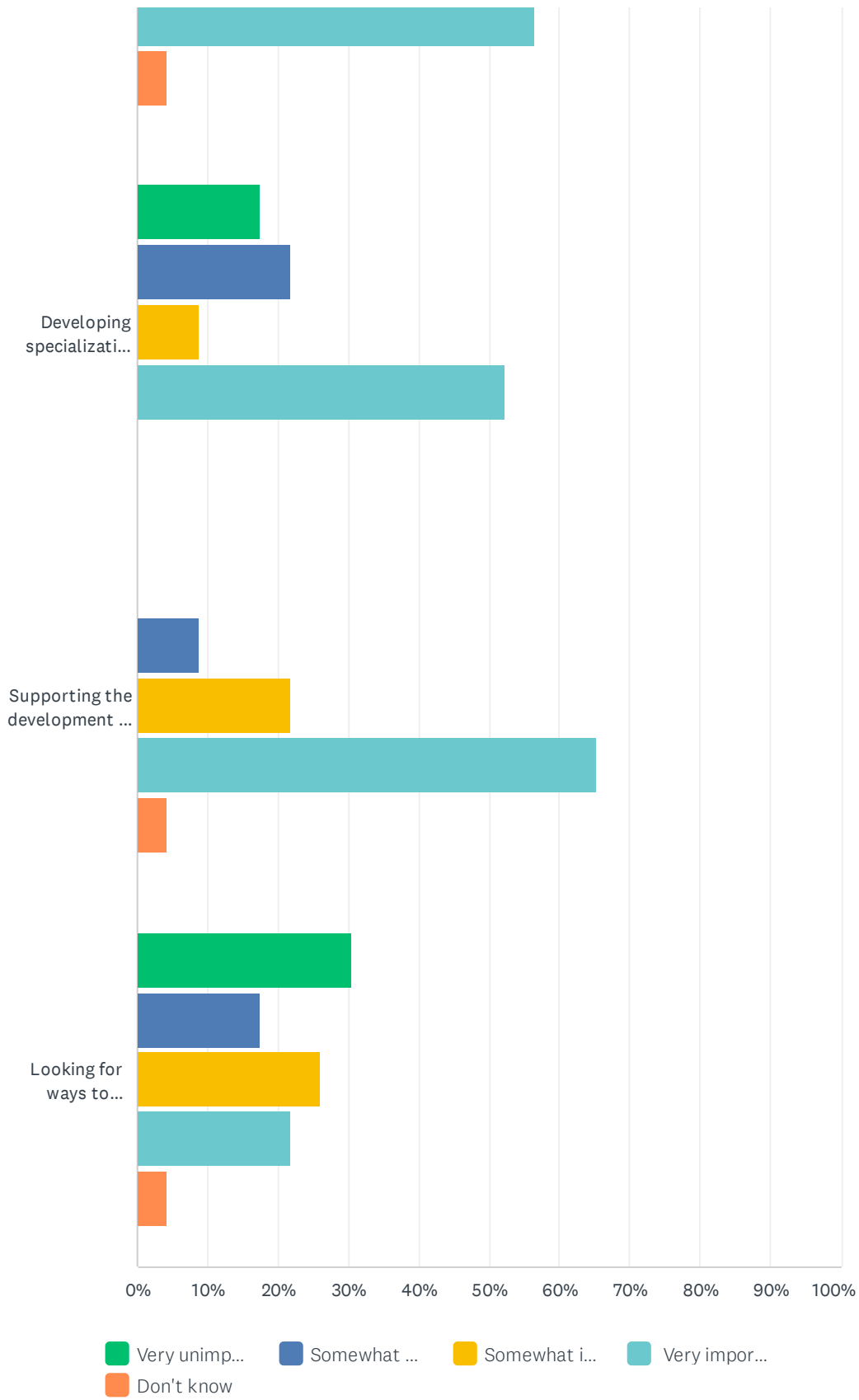
	STRONGLY DISAGREE	DISAGREE	AGREE	STRONGLY AGREE	DON'T KNOW	TOTAL
The College has the financial resources to support its mandate and operations.	4.35% 1	4.35% 1	30.43% 7	43.48% 10	17.39% 4	23
The College has the human resources necessary to support its mandate and operations.	0.00% 0	8.70% 2	52.17% 12	21.74% 5	17.39% 4	23
The College administration uses its resources responsibly to support the College's mission.	34.78% 8	17.39% 4	30.43% 7	8.70% 2	8.70% 2	23
College leaders are knowledgeable about and responsible to the regulatory and operational needs of the College.	8.70% 2	21.74% 5	39.13% 9	26.09% 6	4.35% 1	23

### Q15 The following issues have been identified by stakeholders as ones that the College needs to consider and address. Please indicate how important each issue is in your opinion:

Answered: 23 Skipped: 0







	VERY UNIMPORTANT	SOMEWHAT UNIMPORTANT	SOMEWHAT IMPORTANT	VERY IMPORTANT	DON'T KNOW	TOTAL
Continuing to develop educational tools.	0.00% 0	18.18% 4	40.91% 9	40.91% 9	0.00% 0	22
Making sure that where individuals are exceeding the scope of practice, and/or contravening the policies and standards, the bylaws, the regulations of the college, that it is handled but in a very professional and very diplomatic way.	0.00% 0	0.00% 0	18.18% 4	72.73% 16	9.09% 2	22
Continue to get information out there and communicating well.	0.00% 0	4.35% 1	21.74% 5	69.57% 16	4.35% 1	23
Continue to support the Canadian regulatory community, both in naturopathy and abroad.	0.00% 0	4.35% 1	47.83% 11	39.13% 9	8.70% 2	23
Ensuring the public, stakeholders and Registrants know and understand the role of the regulator.	0.00% 0	13.04% 3	39.13% 9	43.48% 10	4.35% 1	23
Continued development of risk-based regulation.	0.00% 0	8.70% 2	43.48% 10	30.43% 7	17.39% 4	23
Seeking out novel and innovative approaches to fulfill the mandate.	0.00% 0	13.04% 3	52.17% 12	26.09% 6	8.70% 2	23
Working in collaboration to ensure the scope of practice of the profession is uniform across Canada.	4.35% 1	8.70% 2	26.09% 6	56.52% 13	4.35% 1	23
Developing specializations within the profession.	17.39% 4	21.74% 5	8.70% 2	52.17% 12	0.00% 0	23
Supporting the development of the profession.	0.00% 0	8.70% 2	21.74% 5	65.22% 15	4.35% 1	23
Looking for ways to amalgamate with other regulatory authorities	30.43% 7	17.39% 4	26.09% 6	21.74% 5	4.35% 1	23