College of Naturopaths of Ontario

FACT SHEET

CURRENCY

Introduction

This Fact Sheet has been created to provide registrants with additional information on currency hour requirements and the College's currency audit process.

The Importance of Currency

Continued professional competency is not achieved through Continuing Education alone, as such, provisions are set out in the *Registration Regulation* to ensure that registrants practise naturopathy for a minimum amount of time to maintain the necessary clinical competencies, knowledge, skill, and judgment for providing safe, competent, and ethical patient care.

Currency Year

The currency year runs from January 1 – December 31.

For new General class registrants, year one of your three-year cycle begins on January 1 of the registration year in which you became registered with the College. You will not be audited for currency until you have completed your initial three-year cycle.

Currency Requirements

In accordance with sections 6(1) and 6.1(1) of the *Registration Regulation*, if you hold a General or emergency class certificate of registration, you are required to practise naturopathy for a minimum number of hours as a condition of your registration.

General class registrants are required to practise a minimum of 750 hours on a rolling three-year basis.

Emergency class registrants (when the class is open) are required to practise a minimum of 250 hours over each 12-month period that they hold registration in the emergency class.

The College's Registration policy further defines requirements for meeting currency requirements.

New Direct Patient Care Requirements – General Class

Starting April 1, 2027, currency audits of declared practise hours and activities for registrants in the General class [who do not have a non-clinical Term, Condition or Limitation (TCL) on their certificate of registration] will include an assessment of whether the registrant has accrued a minimum of 750 hours of direct patient care over the preceding three-year period.

The College defines direct patient care hours as those acquired through patient interactions (i.e., an assessment and/or diagnosis, treatment and/or monitoring of a patient or patient's condition in accordance with the Standards of Practice of the profession, and any administrative activities or patient case specific research conducted in the course thereof), as well as through the supervision of patient interactions with no more than 20% of those hours attributed to the supervision of patient interactions. Supervision hours must be directly related to patient care and may not, on their own, satisfy the currency requirement, as registrants are required to complete at least 50% of their hours through direct patient interactions and no more than 30% through administrative activities related to direct patient interactions.

The April 2027 currency audit will look at practise hours and activities for January 1, 2024 – December 31, 2026, and will also assess whether the required minimum direct patient care hours have been met.

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Current audits prior to April 1, 2027, will require that your practise of the profession include direct patient care hours, but will not enforce a specific number.

Audits of Currency

During each year's audit, College staff review the currency hours and activities you declared on your Information Return form, completed as part of the annual registration renewal process, and makes determinations as to whether you have satisfied the currency requirements. As part of this process, staff will also evaluate data for potential reporting errors.

If the College determines that you have not satisfied the currency requirements, you will be sent a letter with additional information about your options for remediating currency deficiencies and will be provided with a deadline for initiating your selected remediation option.

Evidence of Practise Hours and Activities

If the College has questions or concerns with the accuracy of the currency data you have reported, you will be contacted and asked to verify this information. In such instances, evidence to support your currency declarations, or to support amendments of this information, will be requested.

Acceptable evidence includes but is not limited to an appointment book or schedule, or letter of employment which confirms your hours worked per week/month. For a full list of acceptable evidence, please refer to the Registration policy.

As a reminder, registrants in the General and emergency classes are required to keep accurate appointment records in accordance with the College's *Standard of Practice for Record Keeping*, which must include the date, time, and duration of the appointment.

Currency Hour Audits after a Period of Inactivity

If you are registered in the Inactive class, or become inactive (e.g., due to a suspension) and return to the General class, your currency audit will include the year you returned to the General class as well as your practise hours for the two years preceding your period of inactivity.

For example, if you were registered in the General class in 2023 and 2024 and moved to the Inactive class in 2025 and then returned to the General class in 2026, your currency audit (conducted after April 1, 2027) would assess your declared practise hours and activities for 2026, 2024 and 2023. It would also assess whether you had engaged in a minimum of 750 hours of direct patient care over that period.

Remediating Currency Deficiencies

Q: Will my certificate of registration be revoked for not meeting currency requirements?

A: No; registrants who are unable to meet currency requirements are provided with a series of options to select from to remediate currency deficiencies.

Sections 6(2) and 6.1(2) of the *Registration Regulation*, sets out options available to registrants in the General class and emergency class who have not met currency hour requirements during their reporting period.

For the General class, these options are:

- completing a refresher program of training approved by the Registration Committee,
- having a non-clinical Term, Condition or Limitation (TCL) applied to their certificate of registration,
- moving to the Inactive class of registration, or

- electing to undergo a Peer & Practise assessment at their own cost.

You may also elect to resign your certificate of registration. If you are enrolled in the Payment Plan Program, the balance of your registration fee must be paid in full before the resignation application can be processed.
For the emergency class, registrants may complete a refresher program of training approved by the Registration Committee, elect to undergo a Peer and Practise Assessment, or resign their certificate of registration.

Q. What will happen if I do not select one of the remediation options provided to me?

A: Registrants who do not initiate a currency remediation option by the College set deadline will be referred to the Quality Assurance Committee by the College's Chief Executive Officer (CEO) to undergo a Peer and Practice Assessment at their own expense (fee noted in Schedule 3 of the by-laws).

Completing a Registration Committee Approved Refresher Program of Training

In recognition that the scope of naturopathy is broad and that currency deficiencies will vary, the Registration Committee allows registrants to self-assess their knowledge and skills and set out what courses or training they propose to undertake to refresh their knowledge, skill, and judgment.

If electing this option, you will be required to propose a course or series of courses, which meet the Refresher Program Guideline requirements, using the College's online Refresher Program Proposal form. This information will then be reviewed by the Registration Committee who are tasked with approving refresher programs. If approved, you will be provided with a deadline for providing the College with proof of completion of your refresher program.

Failure to complete the Committee approved refresher program of training will result in being referred by the CEO to the Quality Assurance Committee for a Peer and Practise review at your expense.

Q: Do I have to stop seeing patients while completing refresher training?

A: No; refresher training may be completed alongside your practise of the profession.

Electing to Move to the Inactive Class

Registrants who are working in a role related to naturopathy but are not practising the profession (i.e., are not engaging in direct patient care) may apply to change to the Inactive class of registration, where currency requirements are halted.

Payment of the class change fee and proof of having purchased enduring or tail coverage for professional liability insurance for a minimum period of five years from the point of ceasing practise of the profession is required.

If you are enrolled in the Payment Plan program, the balance of your General class registration fee must be paid in full before the class change application can be processed.

If you elect to change your class of registration to Inactive as a result of having not engaged in any direct patient care in the prior three-year period, you will be required to undergo a review by a panel of the Registration Committee at point of applying to return to the General class, in accordance with section 6(3) of the *Registration Regulation*, having not practised the profession for more than two years.

Electing to Have a Non-Clinical TCL Applied

If you are working in a non-

clinical capacity (e.g., natural health product development or promotion or administration of a naturopathic educational program), and need to maintain a General class certificate, you may seek to enter into an Undertaking with the College to have a non-clinical TCL applied to your certificate of registration to allow you to meet currency requirements through non-clinical work activities.

Registrants with a non-clinical TCL are required to use the qualifier "(non-clinical)" in brackets immediately following the use of the title naturopath or naturopathic doctor or the ND abbreviation. Information regarding the non-clinical TCL is also posted on a registrant's profile on the public register. If you elect to enter into an Undertaking with the College for the application of a non-clinical TCL as a result of having not engaged in any direct patient care in the prior three-year period, you will be required to undergo a review by a panel of the Registration Committee at point of applying to return to the General class, in accordance with section 6(3) of the *Registration Regulation*, having not practised the profession for more than two years.

More Information

For information on class changes, please visit Change of Class - College of Naturopaths Of Ontario.

For Information on resigning your registration with the College, please visit Resigning Your Registration - College of Naturopaths Of Ontario.

For information on the Refresher Program Guidelines, please see - Refresher Program Guideline and Charts - College of Naturopaths Of Ontario

If you have additional questions, please contact Registration staff at registration@collegeofnaturopaths.on

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