

College of NATUROPATHS of Ontario

2025 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

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

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

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

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

Please note that this report covers the time-period from January 1 to December 31, 2025.

The FRP:

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

2. Organization information

Organization name	College of NATUROPATHS of Ontario
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3. Registration requirements

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

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Naturopath
Academic requirement	Accredited Stream: Successful completion of a 4-year (or 2-year abridged International Medical Graduates) program in naturopathy accredited by the Council on Naturopathic Medical Education (CNME). Non-Accredited Stream: A minimum of a Canadian baccalaureate

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

<p>appropriate page on regulator website):</p>	<p>will vary depending on the type of application (e.g., labour mobility vs a CNME-accredited program graduate) • The completion of the College's 3-step application process with provision of required documentation (i.e., CPR certificate, Criminal Records Check, and Professional Liability Insurance certificate at minimum) and information (e.g., past or current registrations held with other regulatory authorities, educational information, good character/past conduct information and declarations).</p>

4. Third party assessments

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

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

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

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

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

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	Review and amendments to Stage 5 of the College's Prior Learning Assessment & Recognition (PLAR) program, with a reduction of the associated Stage 5 fee, as set out in Schedule 3 of the College by-laws. Amendments ensure demonstration-based components of PLAR (Stages 4 and 5) can administered by the College on a flexible schedule, and costs remain reasonable.
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B. Risks and Mitigations

Risk	Mitigation Measure
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<p>The annual appointment of committee members, some of whom are new and unfamiliar with the duties of the Registration Committee.</p>	<p>Annual Registration Committee member orientation conducted by program staff which covers the Committee's duties, as set out in the Committee terms of reference, as well as an orientation to pertinent sections of the Registration Regulation and the Schedule II of the Health Professions Procedural Code. Use of decision flow-charts and the College's EDIB lens tool and associated checklist. Chair and Committee training which includes understanding the College's mandate, their role, addressing conflicts of interest and bias, the role of staff and legal counsel, and rules of conduct</p>
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6. Changes to registration practices

During the January 1 to December 31, 2025 reporting period, College of NATUROPATHS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Timelines for registration, decisions and/or responses	No	
Changes to internal review or appeal process	No	

Assessment of qualifications, including competency-based assessments and examinations	No	
Registration requirements either through regulation, by-law or policy	No	
Documentation requirements for registration	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Anti-racism and inclusion-based policies and practices	Yes	In November 2025, the Council of the College approved a Council Skills, Expertise and Diversity governance policy (https://www.collegeofnaturopaths.on.ca/wp-content/uploads/2025/12/GP35.00-Council-Skills-Expertise-and-diversity-policy-Nov19-25-1.pdf) and associated processes, as a proactive step for ensuring that members of Council have the skills, expertise and diversity (as set out in the policy) as its primary means of meeting its regulatory and governance mandate.

C. System partners

Registration process	Changes Made (Yes / No)	Description
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Steps to increase accountability of third parties	No	
Mutual recognition agreements	No	
Accreditation of educational programs	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Steps to address labour issues (minister/stakeholders consultations, check demand-supply gap, etc)	No	
Other	No	

7. Membership and application data

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

A. Race-based data collected

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

Additional description:

The College continues to actively consider and discuss the collection of race-based data. While the College understands the importance of collecting such information it must be assured that any future collection is being done responsibly, and for a clearly identified and valid purpose, in keeping with the Ontario Human Rights Code.

B. Other identity-based or demographic data collected

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

Additional description:

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

C. Languages of service provision

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

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

D. Membership Profile

Profession Name	Total Number of Members
Naturopath	1934

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	1736	6
Inactive class	198	0
Emergency Class	0	0

Gender	Number of Members
Male	309
Female	1625

Jurisdiction of Initial Training	Number of Members
Ontario	1905
Other provinces and territories	23
United States	6

Country of Initial Training	Number of Members
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Canada United States of America	1928 6
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Official language of preference	Number of Members
English	1934

Racial identity (optional)	Number of Members
Not collected	1934

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Naturopath	96

Gender	Number of Applicants
Male	11
Female	85

Jurisdiction of Initial Training	Number of Applicants
Ontario	89
Other provinces and territories	6
United States	1

Country of Initial Training	Number of Applicants
United States of America	1
Canada	95

Official language of preference	Number of Applicants
English	96

Racial identity (optional)	Number of Applicants
Not collected	96

G. Data Notes

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H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2025. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn

Ontario	85		1
Other provinces and territories	4	1	
United States			

Applications with decisions pending

The table below summarizes the inventory of applications in progress as of December 31, 2025. Again, some of these applications may have been received in the previous year.

Jurisdiction of initial training	Incomplete	Complete	Total
Ontario	7	11	18
Other provinces and territories	3	2	5
United States	1		

I. New Registrants

For the 2025 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Full / General/ Independent Practice	81	0

J. Data Notes

B8- 13 applications received between January 1- December 31, 2025, which were still "in progress" at the end of this reporting year, met all requirements

but had not paid the registration fee for issuance of a certificate of registration. The number of certificates issued in the General class includes applications received outside of the January 1 - December 31, 2025, reporting year. The emergency class of registration was not open during this reporting period.

K. Reviews and Appeals

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

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

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

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0
Other provinces and territories	1	0

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

Issue or reason raised	Number of appeals
1. Subsection 7 and 3 of the Registration Regulation	1

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

Reason for not registering	Number of internationally trained applicants

L. Data Notes

B11 - An appeal to HPARB was launched, currently still under way.

Glossary of terms

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

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

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

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

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

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

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

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

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