

College of NATUROPATHS of Ontario

2023 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 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA), which is substantially similar to section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA),

“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 23 of FARPACTA and Section 22.9 of Schedule 2 of the RHPA 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 2023 Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2023.

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.

Please note that the 2023 version of the FRP has changed from the previous version in terms of both form and content as the OFC's enabling statutes have evolved and as the office migrates to a more permanent portal-enabled database solution.

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) process.
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 communicate fluently (both written and orally) in English or French; and • a Letter of Standing supporting naturopathic registration in another regulated Canadian jurisdiction; or • an academic transcript noting successful completion of a CNME-accredited program in naturopathy; or • a Letter or transcript from the program in which their formal education pursuant to section 5(1) 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 appropriate page on regulator website):	<ul style="list-style-type: none"> • The completion of requisite entry to practise examinations (required exams 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)

4. Third party assessments

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

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

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 assessment or a language test result, 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	The College's creation of an Equity, Diversity, Inclusion and Belonging (EDIB) lens tool, as detailed in this report.
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B. Risks and Mitigations

Risk	Mitigation Measure
Registration position vacancies due to concurrent staff leaves of absence (e.g., parental leave).	The cross training of department staff to assist with gap coverage, and a plan to add a second Registration

	Coordinator position to the department (occurred in 2024).
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6. Changes to registration practices

During the January 1 to December 31, 2023 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
Registration requirements either through regulation, by-law or policy	Yes	New provisions were added to the Registration Regulation and the College's Registration Policy which set out requirements for issuance and maintenance of a certificate of registration in the Emergency class. Noted changes will ensure continued access to registration in the event that the normal requirements for registration are impacted due to emergency circumstances.
New or consolidated class of certificates or licenses	Yes	A new Emergency class of registration (effective August 31, 2023). Noted changes will ensure continued access to registration in the event that the normal requirements for registration are impacted due to emergency circumstances.
Assessment of qualifications, including competency-based assessments and examinations	No	

Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	Yes	The fee schedule in the College by-laws was updated to include fees associated with the Emergency class of registration (class was not open during this reporting period). Additionally, a small (\$20) increase occurred to the fees associated with the Ontario Clinical (Practical) examinations for entry to practise, to help offset continued rising costs in the delivery of the examinations through outside facilities, the impact of which should not pose a barrier to access for those seeking registration with the College.
Changes to internal review or appeal process	No	
Access by applicants to their records	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	No	

Resources or training to support applicants to move through the licensing process	Yes	A Fact Sheet was created to provide candidates with answers to frequently asked questions about entry to practise examinations: https://www.collegeofnaturopaths.on.ca/wp-content/uploads/2023/07/ETP-Exams-Fact-Sheet-May-2023.pdf .
Anti-racism and inclusion-based policies and practices	Yes	An Equity, Diversity, Inclusion and Belonging (EDIB) lens tool was developed by the College's Equity, Diversity and Inclusion Committee during this reporting period. This tool provides the College's committees and its Council with a structure for standardizing the consideration, and facilitating the reflection and discussion, of EDIB in the process of creating, implementing and assessing College and Council policies.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	No	
Accreditation of educational programs	No	
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made	Description
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	(Yes / No)	
Emergency registration plans	No	
Technological or digital improvements	No	
Steps to address labour shortages in the profession or trade	No	
Other	Yes	The College, in conjunction with other Canadian naturopathic regulatory bodies under the Canadian Alliance of Naturopathic Regulatory Authorities (CANRA), launched a project in 2023 to create a national entry-to-practise practical examination for administration across the regulated provinces to help reduce barriers. The first phase of this project, the establishment of a national entry-to-practise competency profile, was initiated during this reporting period. The College also launched a Consultation Program (https://www.collegeofnaturopaths.on.ca/news/consultations/) as part of its Strategic and Operational plans for eliciting feedback and engagement from the profession, the public and system partners on key regulatory issues.

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? (Yes or No)
Members	No
Applicants	No

Additional description:

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B. Other identity-based or demographic data collected

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

Additional description:

<p>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 one's registration) which is displayed as part of a registrant's profile on the College's public register.</p>

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
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Naturopath	1843

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	1668	0
Inactive	175	0
Emergency	0	0

Gender	Number of Members
Male	313
Female	1530
X (includes trans, non-binary, and two-spirit people)	0

Jurisdiction of Initial Training	Number of Members
Ontario	1817
Other provinces and territories	22

United States	4
Other International	0

Country of Initial Training	Number of Members
Canada	1839
United States of America	4

Official language of preference	Number of Members
English	1843
French	0

Racial identity (optional)	Number of Members
Not collected	1843

E. Data Notes

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F. Applicant Profile

Profession Name	Total Number of Applicants
Naturopath	85

Gender	Number of Applicants

Male	17
Female	68
X (includes trans, non-binary, and two-spirit people)	0

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	85	12
Other provinces and territories	0	
United States	0	
Other International	0	

Country of Initial Training	Number of Applicants
Canada	85

Official language of preference	Number of Members
English	85
French	0

Racial identity (optional)	Number of Members
Not collected	85

G. Data Notes

B3 - Data reflects the total number of applicants for applications received between January 1 and December 31 of the reporting year.

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2023. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	91	0	0
Other provinces and territories	0	0	0
United States	0	0	0
Other International	0	0	0

I. New Registrants

For the 2023 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants by class	Number of internationally educated registrants
Full / General/ Independent Practice Emergency	91 0	0 0

J. Data Notes

B7: Data includes decisions rendered between January 1 and December 31 of the reporting year on applications for registration received outside of the reporting period. B8: The number of certificates issued in the General class includes applications received outside of January 1 and December 31 of the reporting year. The emergency class 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	7	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

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
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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

B.10. Internal review data relates directly to referrals made to a panel of the Registration Committee under the Health Professions Procedural Code. B.11. No appeals were received during this reporting period. B.12. No applications for registration were received from internationally trained individuals and no applications for registration were denied in this reporting period.

8. Changes Related to New Legislative and Regulatory Requirements

By Ontario law, regulated occupations must provide registration practices that are transparent, objective, impartial and fair. Non-health occupations are governed by the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)*, while health professions are governed by the *Regulated Health Professions Act, 2011 (RHPA)*.

In 2021, both statutes were amended to incorporate substantive provisions to:

- A. Eliminate the use of Canadian experience requirements except under prescribed circumstances.
- B. Streamline language proficiency testing requirements.
- C. Provide for the continuity of registration processes during emergency situations.
- D. Set registration time limits. (FARPACTA only)

College of NATUROPATHS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of NATUROPATHS of Ontario has taken the following measures to comply with legislative requirements on eliminating Canadian experience requirements unless an exemption is granted or an alternative is identified that meets criteria prescribed in regulations (non-health regulators) or the exceptions in legislation are met (regulated health colleges).

The College's requirements for registration have never included Canadian experience.

B. Language Proficiency Testing

Change required: No changes required

College of NATUROPATHS of Ontario has taken the following measures to comply with recent legislative changes requiring that regulators accept language proficiency testing results derived from any of the tests accepted for immigration purposes to satisfy their language proficiency requirements:

The College's Language Proficiency policy was amended in September 2022 to include language tests accepted by Immigration, Refugees and Citizenship Canada in the list of College-accepted tests for demonstrating language proficiency.

College of NATUROPATHS of Ontario offers applicants the following options to demonstrate language proficiency.

- IELTS (General)
- CELPIP (General)
- TEF Canada
- TCF Canada
- Other language proficiency tests
- Education in English or French
- Other (please specify) Alternative objective evidence

C. Emergency Registration

Change required: Yes

College of NATUROPATHS of Ontario has taken the following measures to comply with requirements to establish an emergency class (health colleges) or develop an emergency registration plan (non-health regulators).

A consultation on the draft provisions of the College's Registration Regulation for the inclusion of an emergency class was initiated on Jan 26, 2023 and closed on March 28, 2023. Council approval of draft provisions was obtained on March 28, 2023 and submission of the approved draft was submitted to the Ministry of Health by their April 1, 2023 deadline. The regulation obtained cabinet approval and was amended on August 21, 2023.

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.