



College of Naturopaths of Ontario

# Protecting the public. Supporting safe practice.

Annual Report  
April 1, 2023 to March 31, 2024

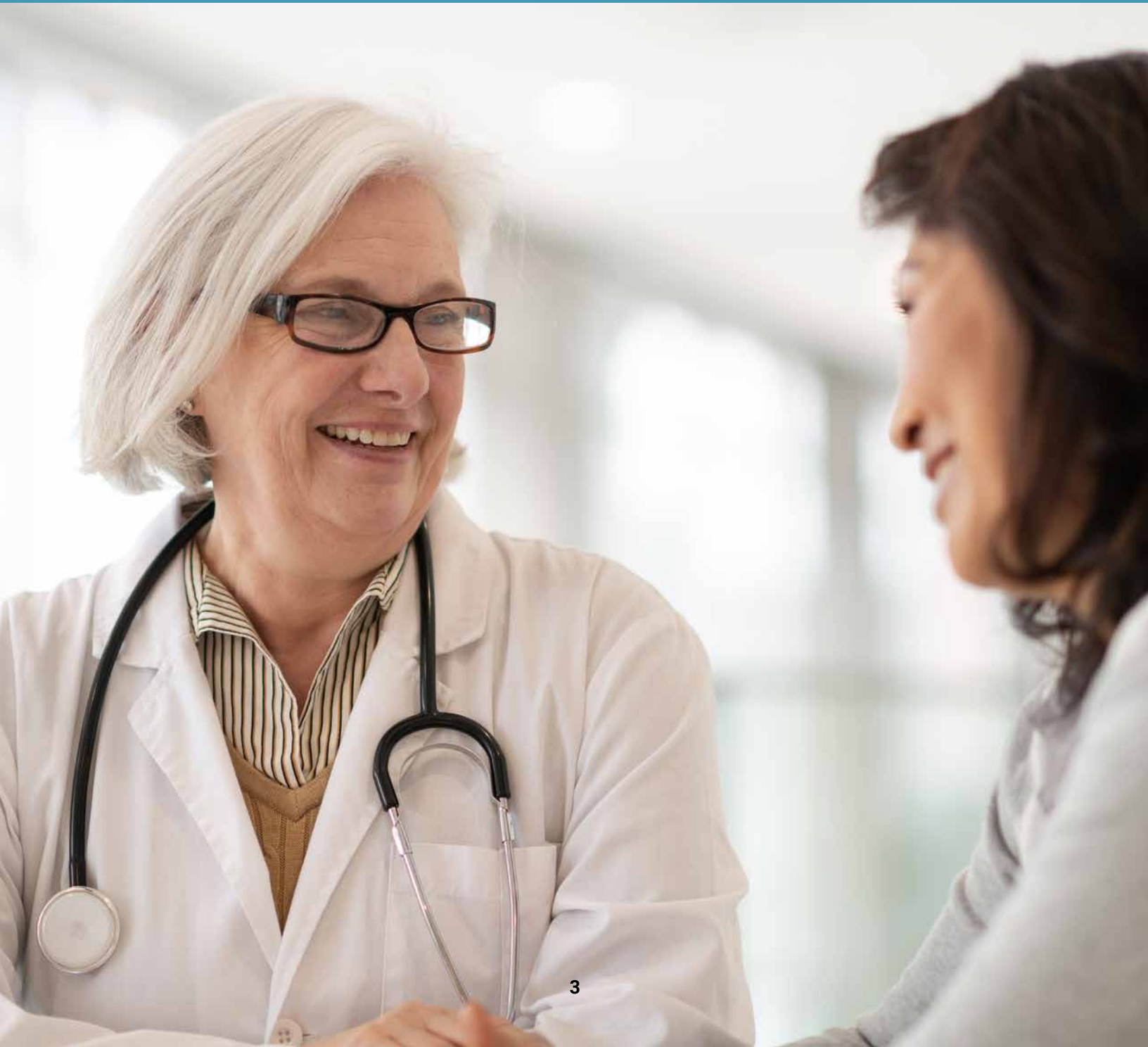


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# About the College of Naturopaths of Ontario

The College of Naturopaths of Ontario (the College) is a health regulatory authority established under the *Naturopathy Act, 2007*, the *Regulated Health Professions Act, 1991* (RHPA), the Health Professions Procedural Code which is Schedule 2 of the RHPA, and the regulations made under each of those statutes.



# Protecting the public. Supporting safe, ethical practice.

The College regulates naturopaths in Ontario in the public interest. Our mandate is to support patients' rights to receive safe, competent, and ethical naturopathic care. We achieve our mandate by performing these four key functions:

## Four Key Functions of Regulation

We achieve our mandate by performing these four key functions:

<b>1. Registering Safe, Competent, and Ethical Individuals</b>	We establish requirements to enter the profession, set and maintain examinations to test individuals against these requirements, and register qualified individuals – individuals who have demonstrated that they can practise naturopathy safely, competently and ethically.
<b>2. Setting Standards</b>	We set and maintain standards of practice that guide our registrants to ensure they provide safe, competent and ethical patient care and inform the public about what to expect from their naturopath.
<b>3. Ensuring Continuing Competence</b>	We create and manage a variety of continuing education and professional development programs to ensure naturopaths maintain their competency as a means of assuring the public that they will receive safe, competent and ethical naturopathic care.
<b>4. Providing Accountability through Complaints and Discipline</b>	We hold naturopaths accountable for their conduct and practice by investigating complaints and concerns, and determining appropriate solutions, including disciplining naturopaths who have not upheld the standards

# Governance of the College

The College, like the 25 other health regulatory authorities in Ontario, is governed by two equally important entities, the Board of Directors and the Staff of the College.

## The Governing Board

The College is governed by a board of directors referred to as a Council. The Council includes up to eight registrants of the College elected throughout Ontario and up to seven public members appointed by the Government of Ontario.

### The Council performs three functions:

1. It ensures that the College fulfills its mandate set out in legislation.
2. It sets the strategic directions of the College and monitors the College's performance.
3. It appoints the Chief Executive Officer and monitors their performance against agreed-upon priorities.

In 2023-24, Council duties and responsibilities were performed by the following individuals.

## Officers and Executive Committee

Dr. Jordan Sokoloski, ND, Council Chair  
Sarah Griffiths-Savolaine, Council Vice-Chair<sup>1</sup>  
Dr. Shelley Burns, ND, Officer-at-Large  
Dean Catherwood, Officer-at-Large<sup>1</sup>  
Dr. Denis Marier, ND, Officer-at-Large

## Council members

Dr. Jonathan Beatty, ND<sup>2</sup>  
Brook Dyson<sup>1</sup>  
Lisa Fenton<sup>1</sup>  
Dr. Anna Graczyk, ND  
Tiffany Lloyd<sup>1</sup>  
Paul Phillion<sup>1</sup>  
Dr. Amy Dobbie, ND  
Dr. Jacob Scheer, ND

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<sup>1</sup>Denotes an individual is appointed by the Lieutenant Governor in Council.

<sup>2</sup>Resigned on March 27, 2024.

# Staff of the College

The operations of the College are overseen by a group of dedicated and talented individuals.

## Executive Leadership

Andrew Parr, *Chief Executive Officer*  
Jeremy Quesnelle, *Deputy Chief Executive Officer*

## Operations

Agnes Kupny, *Director*  
Mike Boyko, *Manager, Human Resources*<sup>3</sup>  
Thussyanthi Pirabakaran, *Finance Coordinator*  
Monika Zingaro, *Administration Coordinator*  
Ian D'Costa, *Senior Communications Officer*  
Yun Zhang John,  
*Marketing Communications Officer*  
Charlotte Ribeiro Lopes,  
*Administrative Assistant Communications*

## Registration & Examinations

Erica Laugalys, *Director*  
Maryam Katozian, *Acting Manager, Registration*  
Sahrish Ali, *Registration Manager*<sup>3</sup>  
Marita Dias, *Entry-to-Practise Coordinator*  
Tuyen Le, *Senior Coordinator, Examinations*  
Anum Jamal, *Examinations Coordinator*  
Sajjad Junaid, *Registration Coordinator*  
Enka Scardino, *Registration Coordinator*

## Professional Conduct

Natalia Vasilyeva, *Manager*  
Rebecca McBride, *Coordinator*<sup>3</sup>  
Shailja Desai, *Administrative Assistant*

## Professional Practice

Dr. Mary-Ellen McKenna, ND (Retired), *Manager*  
Daniella Daley, *Coordinator*  
Joseph Quao, *Administrative Assistant, Regulatory Programs*

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<sup>3</sup>On a leave of absence for part or all this period.

# Letter from the Council Chair

On behalf of the Council of the College of Naturopaths of Ontario, I am delighted to provide the context for the Annual Report of the College of Naturopaths of Ontario for 2023-24 in partnership with the Chief Executive Officer.

This Annual Report reflects one of the most important initiatives any board of directors can undertake, strategic planning for the organization. A strategic plan identifies where the governing body wishes to take the organization through its strategic objectives and which streams of activities it believes to be the most important through its strategic priorities.

In the fall of 2022 and the winter of 2023, the Council of the College embarked on its strategic planning process; however, in this planning initiative we truly started with an examination of what the College was doing, and what the Council had previously seen as being important. It was a process that was inclusive of all Council members, the public, registrants, system partners and staff of the College.

In this annual report, we will focus on the strategic objectives and priorities established by the Council coming out of its planning process and focus on the changes to operations, where we have succeeded and where on-going work will be required.

Dr. Jordan Sokoloski, ND  
Council Chair

# Letter from the CEO

Dr. Jordan Sokoloski, ND, Council Chair has noted the importance of the Council's strategic planning process, the collaborative approach the Council has taken and the partnership between the Council and the staff of the College. As an organization, the College should be proud of the partnerships that have been developed as there is truly no better way to serve and protect the public interest than through strategic and operational partnerships.

This Annual Report is the first report since the Council completed and approved its new strategic plan. It is fitting therefore, that we refocus our approach to the report to align with the strategic plan. In March of 2023, immediately following the approval of its Strategic Plan, the Council was presented with an Annual Operational Plan. That plan, like this report, focused on the strategic objectives and priorities set by the Council. It is therefore quite fitting that the annual report takes the same focus to bring alignment of the organization, from top to bottom.

This report will reflect the highlights of our continued journey and our unwavering commitment to serving and protecting the people of Ontario by ensuring the standards of naturopathic care in the province. Through this report, readers will be able to see our continuing efforts in safeguarding the public, promoting safe and competent practice as well as our commitment to innovation and excellence in all that we do.

Looking forward, the College is poised to continue its efforts in pushing boundaries. We remain committed to, and I invite each of you to join us in this transformative journey as we embrace change and strive for continuous improvement.

If you have any comments or questions about this Annual Report, please reach out to me directly at [ceo@collegeofnaturopaths.on.ca](mailto:ceo@collegeofnaturopaths.on.ca).

Andrew Parr, CAE  
Chief Executive Officer



# Strategic Framework

**A new Strategic Framework, established by the Council in January 2023, sets out the College's vision, mission, desired outcomes and key priorities over the next five years. It lays the framework for the direction of the organization and provides a shared understanding of our purpose and our goals.**



# Strategic Framework Overview

<b>Our Mission</b>	<i>The College proactively regulates Naturopathic Doctors to ensure safe, ethical and competent naturopathic care for the people of Ontario.</i>
<b>Our Vision</b>	<i>Trust in naturopathic doctors through effective regulation</i>
<b>Our Values</b>	<p><i>The College of Naturopaths of Ontario will govern the profession and its own activities based on its values. We will:</i></p> <ul style="list-style-type: none"><li><i>• Be fair, equitable, transparent, and accountable</i></li><li><i>• Act with honesty and integrity</i></li><li><i>• Work collaboratively with others</i></li><li><i>• Value diversity, foster inclusivity and belonging</i></li><li><i>• Accept diverse perspectives and value healthy debate</i></li><li><i>• Be respectful and professional</i></li><li><i>• Treat all human resources as a key asset</i></li><li><i>• Ensure that our standards and processes are evidence-informed</i></li><li><i>• Respect the health of the individual and the environment, and</i></li><li><i>• Be courageous, bold, and innovative</i></li></ul>

# Strategic Objectives & Priorities

Forming the backbone of the Council’s strategic framework, these represent what the Council wants the College to achieve, and the key areas that the Council wants the College to focus on in order to do so.

For each of the noted priorities, the CEO of the College has also established operational activities that the College will engage in to accomplish the strategic priorities. These are set out in the College’s [Operational Plan](#) and are also highlighted within this report.

Strategic Objectives	Related Strategic Priorities
<p><b>Strategic Objective #1</b></p> <p>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.</p>	<ul style="list-style-type: none"> <li>• The College engages its system partners to further their understanding and trust in the College and the profession.</li> <li>• The College engages its registrants and the public to further their understanding and trust in the College and the profession.</li> <li>• The College relies on a risk-based approach to proactively regulate the profession.</li> </ul>
<p><b>Strategic Objective #2</b></p> <p>Naturopathic Doctors are trusted because they are effectively regulated.</p>	<ul style="list-style-type: none"> <li>• Applicants are evaluated based on their competence and evaluations are relevant, fair, objective, impartial and free of bias and discrimination.</li> <li>• Registrants and the public are aware of and adhere to the standards by which NDs are governed.</li> <li>• Registrants are held accountable for their decisions and actions.</li> <li>• Registrants maintain their competence as a means of assuring the public that they will receive safe, competent, ethical care.</li> <li>• The College examines the regulatory model to maximize the public protection benefit to Ontarians.</li> </ul>

# 2023–2024 Year in Review

The College Council and the College operationally engaged in many important activities in 2023–2024. While it is often difficult to do so, we believe the highlights of 2023–2024 are best reflected in the following accomplishments.



## New Strategic Plan & its Implementation

Strategic planning is no small feat for any board of directors and represents considerable effort on its part and on the part of those who support it and the College. Although the plan was approved in January 2023, its implementation only began in April 2023. That the Council successfully navigated the process, developed and approved the plan and has seen its implementation begin is one of the successes of 2023-24.

## First Currency Audit Completed

The Registration Regulation anticipates that registrants of the College will practice the profession for 750 hours in each three-year period. In 2023-24, the College conducted its first formal audit of registrants' practice hours and conducted follow-ups to ensure that those registrants who intended to continue to practice engaged in appropriate refresher training to maintain their competence.

## Development of Risk-based Regulation

For two years the College has been researching and developing a Risk-based Regulation approach. Unlike the traditional regulatory model, which is reactive and dependent on complaints and related information being received by the College, Risk-based Regulation anticipates reviewing all data available to the College to identify where changes in practice or circumstances might represent a risk of harm to patients and having identified the risks, taking appropriate steps to reduce the risk of harm from occurring.

## Regulatory Education Program

Flowing from the Council's new strategic plan, in April 2023 the College began the development of the Regulatory Education Program (REP),

a series of webinars offered by the College at no charge to attendees, and generally with continuing education credits associated with them. These webinars focus on key regulatory issues and summarize all the legislated (statute and regulation) and regulatory (standards of practice) pertaining to that issue. In 2023-24, the College developed and delivered six REP sessions, attended by 470 registrants and interested individuals.

## Emergency Class

In 2022, each health regulatory College was mandated to develop an emergency class and submit draft regulations to the Ministry of Health enabling that class. The development and submission of this draft regulation was completed at the end of March 2023; however, in the reporting period for this Annual Report, the regulation was approved by the Lieutenant Governor in Council (August 2023) and implemented with necessary by-law and policy changes having been completed shortly thereafter to fully enable this new class of registration.

## National Support of Canadian Naturopathic Regulators

In 2023-24, the College continued to support not only each of its naturopathic regulatory partners across Canada but also the Canadian Alliance of Naturopathic Regulatory Authorities (CANRA). Through CANRA, the College provided overall leadership and support by acting as Chair of the organization, supporting the development of a national entry-to-practice competency profile for Canadian naturopaths, supporting the work of the CANRA Steering Committee for the development of a national entry to practise practical exam and by partnering with other regulators, such as the Manitoba Naturopathic Association (MNA) with whom a Memorandum of Understanding was entered into such that the College can support the MNA through the Prior Learning Assessment and Recognition Program.

# Strategic 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.



# Strategic Objective #1

Strategic Priority	Related Operational Activities
<p><i>The College engages its system partners to further their understanding and trust in the College and the profession.</i></p> <p><i>The College engages its registrants and the public to further their understanding and trust in the College and the profession.</i></p> <p><i>The College relies on a risk-based approach to proactively regulate the profession.</i></p>	<ul style="list-style-type: none"> <li>• Individual system partner engagement</li> <li>• In Conversation With Program</li> <li>• Regulatory Guidance</li> <li>• Regulatory Education Program</li> <li>• Corporate Communications</li> <li>• Risk-based Regulation Program</li> </ul>

## System Partner Engagement

A system partner is any group who in some way supports or participates in the regulation of the profession. For any health regulatory authority, there will be those system partners that are in a closer orbit to the work of regulating a particular profession and those who, while still system partners, may be a few steps removed.

For the College, we would consider our more closely aligned system partners as the Ontario Ministry of Health, the Ontario Association of Naturopathic Doctors, the Canadian College of Naturopathic Medicine, Health Profession Regulators of Ontario, the Canadian Alliance of Naturopathic Regulatory Authorities, the public and the profession.

Other system partners with whom the College engages but with whom it may be somewhat less aligned include other health regulatory Colleges,

other health professional associations, other naturopathic regulatory authorities, and other government agencies and ministries.

### STATS AT A GLANCE

One on one meetings with system partners:

- Canadian Alliance of Naturopathic Regulatory Authorities: 13
- Canadian College of Naturopathic Medicine: 1
- Health Profession Regulators of Ontario: 3
- Ontario Association of Naturopathic Doctors: 6
- Ontario Ministry of Health: 3

# STRATEGIC OBJECTIVE #1

## In Conversation With Program

The In Conversation With program allows the College to engage in dialogue with registrants and members of the public through a focused question and answer townhall-style or fireside chat. Attendees submit questions in advance and the College organizes those questions into themes and holds a webinar to answer those questions and live follow up questions posed by attendees.

This year, two of the sessions included guest speakers from outside of the College. In April 2023, a representative of the Ministry of Health joined the College to talk about how regulation works. In November 2023, the Board Chair and CEO of the Ontario Association of Naturopathic Doctors joined the CEO and Council Chair of the College in a session discussing the differing roles of the two organizations.

### STATS AT A GLANCE

#### Breakdown of Sessions & Attendance

Session	Date	Attendance
How Regulation Works	April 20, 2023	58
Inspection Program	June 14, 2023	37
Self-reporting and Mandatory Reporting	September 28, 2023	50
The role of the College vs. the OAND	November 22, 2023	53
Volunteer Program	March 21, 2024	18

## Regulatory Guidance

The College's Regulatory Guidance program addresses inquiries from naturopaths, the public, insurance companies, other regulators, and professional associations. It offers clarity on regulations, standards of practice, guidelines, and policies related to the regulation of naturopathy in Ontario.

### STATS AT A GLANCE

#### Number of inquiries received

	2022-23	2023-24
By Email	328	351
By Phone	296	253
Total	624	604



## STATS AT A GLANCE

### Most frequently inquired-about Topics

Topic of Inquiry	2022-23	2023-24
Fees and billing	50	49
Telepractice	42	47
Laboratory tests	26	46
Record Keeping/Records Transfer	38	44
Scope of practice in Ontario	57	42
Patient visits	37	31
Inspection Program	37	28
Privacy and Consent	19	27
Delegation and Referrals	29	25
Notifying Patient When Moving	21	18

## Regulatory Education Program

The Regulatory Education Program (REP) was launched in this reporting period in support of the Council's new strategic objectives and priorities, with the intent of increasing the trust of the College among the profession and public by providing no-cost continuing education programming on key regulatory topics. The program also provides the College with an opportunity to increase understanding of the legislation, regulations and standards among members of the profession and the public and

to increase the success of the profession in compliance with the regulatory framework in these areas.

In initiating this program, the College issued a Request for Proposals among various educators seeking their interest in presenting material and identifying key topics. A roster of nine individuals was developed, as well as invitations to external individuals to participate. Six sessions were offered in 2023-24 as well as the release of the schedule for 2024-25.

## STRATEGIC OBJECTIVE #1

### STATS AT A GLANCE

#### Summary of Live Sessions

Session Title	Session Date	Attendance
Scope of Practice: Demystifying Practice Parameters	August 14, 2023	69
Health Profession Advertising in the Age of Social Media	September 18, 2023	89
Tele-practice in the Post-pandemic Era	October 20, 2023	71
Identifying the Lines Governing Sexual Abuse in Health Care	December 4, 2023	47
Complaints and Investigations: Converting Retreat into Advance	March 11, 2024	128

#### Summary of Recorded Sessions

Session Title	Views
Scope of Practice: Demystifying Practice Parameters	41
Health Profession Advertising in the Age of Social Media	55
Tele-practice in the Post-pandemic Era	8
Identifying the Lines Governing Sexual Abuse in Health Care	44
Complaints and Investigations: Converting Retreat into Advance	33

## Consultation Program

The College’s consultation program was redeveloped in 2023-24. While prior consultations were primarily limited to proposed changes to regulation and the College’s by-laws, the new consultation program seeks to elicit feedback and educate stakeholders and the public on proposed changes to other key documents such as policies, professional standards and guidelines. Copies of consultation materials for all consultations conducted as part of this program, both past and present, are available on the College [website](#).

### STATS AT A GLANCE

Consultation Name	Consultation Launch	Respondent
Proposed by-law changes	September 2023	2 registrants
Proposed changes to the Registration Policy - Currency	October 2023	11 registrants 2 organizations
Data Collection relating to the Standard of Practice for Therapeutic Prescribing	November 2023	19 registrants 2 organizations

## Corporate Communications

The communications functions of the College provide valuable information to help patients make informed decisions about their care and offer guidance on how to address concerns regarding naturopathic practice. It also serves to keep naturopaths updated on regulatory requirements, ensuring they can effectively implement best practices to protect the public.

To enhance the College’s outreach and align with contemporary standards, an updating of outbound communications and marketing materials was undertaken. This initiative included updates to email templates, branding elements,

and graphic design. The goal was to present a more modern, accessible, and inviting image of the College.

Establishing and maintaining a fully bilingual online presence is a priority for College, ensuring broader outreach to Ontarians and compliance with the Official Languages Act. Over the past year, through collaboration with external translation partners, the website, including forward-facing pages, news articles, and blog posts, has been fully translated. Additionally, an internal translation program has been implemented to ensure that all updates and new content are promptly and accurately translated.

# STRATEGIC OBJECTIVE #1

## STATS AT A GLANCE

### Digital Communications

Communication Chanel	Number Sent/Posted	Open Rate
iNformedD	12	78%
Emails	49,006	80%
Website		216,080 unique views

News Articles: 23 English Language, 16 French-language  
LinkedIn: 870 followers, 1,226 impressions  
Facebook: 73 followers, 98 impressions

### Risk-based Regulation Program

The Council of the College identified Risk-based Regulation as one of its strategic priorities. A traditional approach to regulation of a profession relies on individuals, such as registrants or the public, to provide information to the regulator to which the regulator reacts. The most typical example is a complaint filed by a member of the public against a registrant. Risk-based Regulation is intended to be more proactive in its approach, using the information that is available from its own regulatory processes and other sources, to assess the information and identify

any potential risk of harm to patients. Once risks are identified, the regulator, in partnership with its system partners, can identify ways to reduce the risk through remedial programming such as information sharing, educational programs, and awareness campaigns.

In this reporting year, the College Council was presented with a complete outline of the Risk-based Regulation program for the College, including the various data sets that will be included and additional data sets to be developed. The Council accepted the new program allowing the College to move forward with implementation in the coming year.

# Strategic Objective #2

**Naturopathic Doctors are trusted because they are effectively regulated.**



# Strategic Objective #2

Strategic Priority	Related Operational Activities
<i>Effective regulation of the profession.</i>	<ul style="list-style-type: none"> <li>• Good Governance</li> <li>• Properly constituted</li> <li>• Volunteer Program</li> <li>• Human Resource Management &amp; Planning</li> <li>• Sound financial management</li> <li>• Transparency &amp; Accountability</li> <li>• Commitment to oversight requirements</li> </ul>
<i>Applicants are evaluated based on their competence and evaluations are relevant, fair, objective, impartial and free of bias and discrimination.</i>	<ul style="list-style-type: none"> <li>• Examinations Program</li> <li>• Entry-to-Practise Program</li> <li>• PLAR Program</li> </ul>
<i>Registrants and the public are aware of and adhere to the standards by which NDs are governed.</i>	<ul style="list-style-type: none"> <li>• Inspection Program</li> <li>• Standards Program</li> </ul>
<i>Registrants are held accountable for their decisions and actions.</i>	<ul style="list-style-type: none"> <li>• Registration Program</li> <li>• Professional Corporations Program</li> <li>• Patient Relations Program</li> <li>• Complaints &amp; Reports Program</li> <li>• Hearings Program</li> </ul>
<i>Registrants maintain their competence as a means of assuring the public that they will receive safe, competent, ethical care.</i>	<ul style="list-style-type: none"> <li>• Quality Assurance Program</li> <li>• Audit of Currency Hours</li> </ul>
<i>The College examines the regulatory model to maximize the public protection benefit to Ontarians.</i>	<ul style="list-style-type: none"> <li>• Review/Update of Regulations, Standards &amp; By-laws</li> </ul>

## STRATEGIC OBJECTIVE #2

### Adherence to the Principles of Good Governance

For the College to effectively regulate the profession in Ontario, the College itself and its Council must adhere to the principles of good governance. That the College is governed well is a matter of public interest. An organization cannot serve and protect the public interest by not performing its role and governing itself appropriately.

### Proper Composition of Council & Committees

Over this reporting period, the Council has held six meetings. Through its annual appointment process and regular committee reports it receives, the Council has ensured that each of its committees are properly constituted and fully operational. During this reporting period, the Council also held an important in-person meeting where it conducted extensive training of all Council members on their roles, responsibilities and fiduciary duties as well as training on its governance model and approach to Council and committee functions.

### Human Resources Management & Planning

While the Council's primary employee is the Chief Executive Officer, the Council has additional responsibilities surrounding the human resources of the College. The Council has an obligation to ensure that there are sufficient resources available to deliver the regulatory programs. They also must ensure that the human resources of the College are well managed, meaning that all positions must have a clear position description, incumbents must have annual performance reviews, and there is

a human resource policy that is fair, transparent and available to all employees. The Council must also ensure that there is a human resource plan for the College that looks ahead to the changing landscape and ensures that sufficient personnel will be available in the future and that the strategic plan of the Council can be moved forward.

At its March meeting annually, the Council of the College receives, for its review, an Operational Plan which sets out the activities of the College for the coming 3-year period, a human resource plan that identifies the needs of the College to support the activities and a budget (operational and capital) to support the College activities.

### Volunteer Program

While most registrants might believe that the staff of the College make regulatory decisions, the reality is that for all decisions relating to individual registrants of the College, regulatory decisions are made by the many members of the College's Volunteer Program, who represent a mix of the profession and members of the public. Roles performed by volunteers include examiners, assessors, inspectors, and committee members making important decisions about who becomes registered, how a complaint should be addressed, whether a registrant was incompetent in their practice or committed acts of professional misconduct.

The College has developed and maintained a robust volunteer program to recruit, train and engage its many volunteers. Each year, new volunteers are recruited, evaluated through a competency-based program and interviewed by the Governance Committee of the Council. Committee appointments are made annually in May by the Council.

## Sound Financial Management

Good governance of the College also means that the organization employs sound management principles, ensuring that the College has the financial resources necessary to sustain its long-term viability.

During the year, quarterly financial statements are presented to the Council of the College and released publicly along with a variance report that explains how and why actual financial results for the period have been different than anticipated in the budget.

Detailed policies of the Council ensure that the finances of the College are managed in accordance with its wishes and that reports reflect the level of detail it requires.

Annually, an external, independent auditor undertakes an audit of the College's financial statements. That audit for 2023-24 is provided in this report and indicates that the statements reflect the actual financial standing of the College.

## Transparency & Accountability

The College's commitment to transparency and accountability has been met and maintained during this past year. Council meeting materials are released publicly through the College's website one week prior to the meeting. Council meetings are open to the public, apart from human resource matters which are properly excluded, and are live streamed.

The Council has maintained its annual conflict of interest questionnaire, a summary of which is included in each meeting package. A full report of annually declared Council conflicts of interest is made available on the College's [website](#).

## Commitment to oversight requirements

The College and its Council have been and remain committed to the oversight requirements of the Ontario Government and its various agencies. In 2023-24, the College provided information to the Office of the Fairness Commissioner (OFC) to allow the OFC to assign an initial risk level rating under its [Risk Informed Compliance Framework](#) (RICF) and submitted its annual Fair Registration Practices Report with the OFC. A copy of the report (along with all prior reports) is published on the [College website](#). The College's achieved OFC risk rating in this reporting period was "low risk", having been deemed to have appropriate tools and processes in place to mitigate potential impediments to fair registration practices.

The College has also remained committed to working with the Ontario Ministry of Health and providing its annual College Performance Measurement Framework Reporting Tool. The [2023 report](#) was submitted to the Ministry at the end of March 2024.



## STRATEGIC OBJECTIVE #2

### Health Professions Appeal and Review Board

The Health Professions Appeal and Review Board (HPARB) serves as an independent body established by provincial legislation to oversee the College's accountability. While the College holds its registrants accountable for their conduct, HPARB ensures that the College's processes are fair, equitable, and objective. HPARB has jurisdiction over appeals related to:

- Registration decisions made by the Registration Committee.
- Decisions concerning complaints made by the Inquiries, Complaints, and Reports Committee (ICRC).

#### Registration Decisions

All decisions of the Registration Committee, except for a decision directing the CEO to issue a certificate of registration, can be appealed to HPARB. No appeals were filed in 2023.

#### Complaint Decisions

Either the person who files a complaint, or a registrant who was the subject of a complaint, can request HPARB to review the ICRC's decision on a complaint within 30 days of receipt of the decision. When considering a complaint, the Inquiries, Complaints and Reports Committee can:

- Take no further action if the evidence is insufficient.

- Issue a Letter of Counsel.
- Require completion of continuing education or a remediation program.
- Require the registrant to appear before the ICRC for a caution.
- Accept an undertaking to improve or restrict practice.
- Accept an undertaking to resign and never reapply for registration.
- Refer allegations of professional misconduct or incompetence to the Discipline Committee.
- Refer the matter to another ICRC panel for incapacity proceedings if there's concern about the Registrant's capacity.

### STATS AT A GLANCE

Council meetings held: 6  
 Council members: 7 professional, 6 public (appointed by Government)  
 College staff: 21  
 Volunteers from the profession: 158 (89%)  
 Volunteers from the public: 13 (8%)  
 Volunteers appointed by Government: 5 (3%)  
 New volunteers in 2023-24: 23  
 HPARB Appeals of registration decisions: 0

HPARB Appeals of ICRC decisions	2022-23	2023-24
Appealable ICRC decisions	22	14
Decisions appealed	2	4
Outcomes	0	3

## Examinations Program

The College administers four entry-to-practice examinations, the Ontario Clinical Sciences Examination, the Ontario Clinical (Practical) Examinations, the Ontario Biomedical Examination and the Ontario Jurisprudence Examination, which collectively determine whether an individual possesses the necessary competencies to enter the profession.

Except for the Jurisprudence examination (a low-stakes, open book exam), three attempts are provided for successful completion of examinations with mandatory remediation, as determined by a panel of the Registration Committee, required after two unsuccessful attempts.

Two post-registration examinations are also administered by the College:

1. The Ontario Prescribing and Therapeutics Exam, for NDs wishing to meet the Standard of Practice for Prescribing to perform the controlled acts of prescribing, dispensing, compounding, selling drugs, and/or administering substances by non-IVIT injection or inhalation.
2. The Ontario Intravenous Infusion Therapy (IVIT) Exam, for NDs wishing to meet the Standard of Practice for IVIT to perform the controlled acts of administering a substance by intravenous injection, and/or compounding a substance for administration by intravenous injection.

### Examination Appeals Committee

The Examination Appeals Committee develops policies and procedures governing the appeal process for College-administered examinations. It also reviews appeals filed by candidates related to failed entry-to-practise and post-registration examinations. Grounds for appeals are limited to procedural or environmental irregularities or a perception of undue bias which a candidate believes negatively impacted their ability to successfully complete the exam.

#### STATS AT A GLANCE

##### Entry to Practise Exams

Exam Type	Number of Candidates	Number of Exam Sessions	Overall Pass
Ontario Clinical (Practical)	119	4	79%
Ontario Clinical Sciences	112	2	67%
Ontario Biomedical	112	2	67%

## STRATEGIC OBJECTIVE #2

### Jurisprudence Exam

Number of completions: 88

### Post-Registration Exams

Exam Type	Number of Candidates	Number of Exam Sessions	Overall Pass
Ontario IVIT Exam	44	2	70%
Ontario Prescribing & Therapeutics	91	2	54%

Registrants Authorized to Prescribe	Number of Candidates
861	355

### Examination Appeals

	2022-23	2023-24
Appeals filed	5	5
Appeals granted	4	5
Appeals denied	1	0

### Entry-to-Practice

The entry-to-practise program is the primary vehicle through which the College registers safe, competent, and ethical individuals to practise naturopathy in Ontario. Through this program, the College also administers its Prior Learning Assessment and Recognition (PLAR) process which assesses individuals who did not graduate from a program in naturopathy accredited by the Council on Naturopathic Medical Education (CNME), but who have a combination of education and experience which may be 'substantially equivalent' to that of a CNME-accredited program graduate.

### Registration Committee

Panels of the Registration Committee consider applications for registration referred by the CEO when they:

- Have doubts on reasonable grounds that the applicant fulfils the registration requirements,
- Believe that a term, condition or limitation should be imposed on the applicant's certificate of registration, or
- Propose to deny issuance of a certificate of registration.

Common referral indicators include reasonable doubt related to an applicant's:

- Currency of knowledge and skills, having exceeded the timeline set out in Regulation for completion of entry to practise requirements.
- Practice of the profession in another Canadian jurisdiction (labour mobility).
- Good character/past conduct, and
- Ability to practise safely and competently in relation to a physical or mental condition or disorder.

Decisions made by panels of the Registration Committee, except for those directing the CEO to issue a certificate of registration, can be appealed to the Health Professions Appeal and Review Board (HPARB).

## Prior Learning Assessment and Recognition (PLAR) Program

This [multi-stage assessment process](#) of an individual's knowledge and skills for 'substantial equivalency' to that of a CNME-accredited program graduate is comprised of five assessment stages which are a mix of paper-based, knowledge-based and demonstration-based components. To be accepted for assessment in the PLAR program, individuals must have sufficient language proficiency and have a minimum of a Canadian Bachelor's degree or equivalent in a healthcare discipline reasonably related to naturopathy.

### STATS AT A GLANCE

	2022-23	2023-24
Application in process from prior year(s)	8	14
Applications received this year	97	81
Certificates issued	91	84

*The number of applications received, and certificates issued may not always align due to when they were received, deferrals, submission of documents and payment of fees, among other mitigating factors.*

On average, applications for registration, not requiring referral to a panel of the Registration Committee for review, were processed within two business days. Referred applications were processed, on average, within 17 business days.

## Registration Committee Application Referral Outcomes

Number of Referrals: 8  
 Certificate issued at application: 6  
 Certificate issued after completing additional exams: 0  
 Certificate issued with terms, conditions or limitations: 1  
 Certificate issued after completing additional education or training: 1  
 Denied registration: 0

## PLAR Applications

New applications received in 2023-24: 0  
 Ongoing applications: 1 (Stage 3)

## Inspection Program

The College's Inspection Program ensures the safety and quality of Intravenous Infusion Therapy (IVIT) provided by naturopaths in Ontario. Due to the inherent risks of IVIT procedures—such as administering substances via IVIT or preparing customized therapeutic products—strict standards are enforced.

According to the General Regulation under the *Naturopathy Act, 2007*, all new IVIT premises must pass an inspection before offering IVIT procedures. Existing premises were required to be inspected by March 1, 2019, when the Regulation came into effect. The Inspection Program has fulfilled this requirement, with subsequent inspections scheduled every five years from the initial inspection date.

## STRATEGIC OBJECTIVE #2

### New Premises Inspections

New premises registering to be able to provide an IVIT procedure undergo a two-part inspection program.

**Part I Inspection:** The initial part of the inspection ensures that a clinic meets all IVIT program requirements before starting IVIT procedures, confirming its readiness for safe, competent care.

**Part II Inspection:** The second part of the inspection occurs after IVIT procedures have begun being provided at the new clinic, involves direct observation of the procedures and review of patient records related to IVIT.

### Inspection Committee

The Inspection Program is supported by an Inspection Committee composed of IVIT-qualified naturopaths and a public member. The Committee reviews inspection reports, assesses outcomes, and determines whether a premises can open or continue providing IVIT services. It also reviews occurrence reports, deciding on necessary follow-up actions for Type 1 Occurrences. During this reporting period, the Committee delivered 69 final outcomes, demonstrating its active role in ensuring the safety and quality of IVIT services.

### Occurrence Reports

Under the Inspection Program, registrants must report events, known as occurrences reports, to the College. There are two types of occurrence reports that are required.

### Type 1 Occurrence Reports

These reports are required to be filed with the College within 24 hours of when the registrant

becomes aware of the specific event having occurred. While most Type 1 Occurrence Reports are filed by a registrant directly involved in the treatment, every registrant who becomes aware of the event is required to report the occurrence. There are six events that are subject to these reporting requirements:

1. Death of a patient on-site at the clinic or within five days of the IVIT procedure.
2. Referral of a patient to emergency services within five days of the IVIT procedure.
3. Performing a procedure on the wrong patient.
4. Administration of an emergency drug immediately following the IVIT procedure.
5. Diagnosis of shock or convulsions of a patient within five days of the IVIT procedure.
6. Diagnosis of post-procedure infections in a patient within five days of the IVIT procedure.

When a Type 1 occurrence is reported, the College gathers relevant information and presents the case to the Inspection Committee. The Inspection Committee's ability to address issues and to refer matters to other regulatory processes within the College plays a crucial role in integrating our regulatory programs, enhancing public protection and ensuring patient safety.

The most serious cases involve patient deaths occurring within five days of an IVIT procedure. In the past year, there was one recorded instance of a patient passing away within five days of an IVIT procedure while receiving adjunctive care<sup>4</sup> for terminal illnesses from a naturopath at the clinic. This death, however, was attributed to the patient's underlying illness, not the IVIT procedure. In the Type 1 occurrence report noted above, the Committee's review determined that no further action was required.

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<sup>4</sup>Adjunctive care is treatment that is in addition to other forms of care a patient is receiving.

## Type 2 Occurrence Reports

All premises conducting IVIT must monitor and report Type 2 occurrences to the College annually. These include:

- Infections
- Unscheduled treatments within five days of an IVIT procedure, and
- Adverse drug reactions following IVIT procedures.

Type 2 occurrence data is submitted to both the Inspection Committee and the Council. The Inspection Committee analyzes this information to detect trends that might necessitate additional guidance for premises and registrants performing IVIT. This data also supports the review and enhancement of standards governing premises, with the aim of further strengthening public safety.

Type 2 Occurrence Reports were received from the 168 premises performing IVIT procedures during this reporting period, of which 31 reported one or more Type 2 occurrences.

A total of 90,916 IV bags were compounded and 87,150 were administered. A total of 154 Type 2 occurrences were reported.

### STATS AT A GLANCE

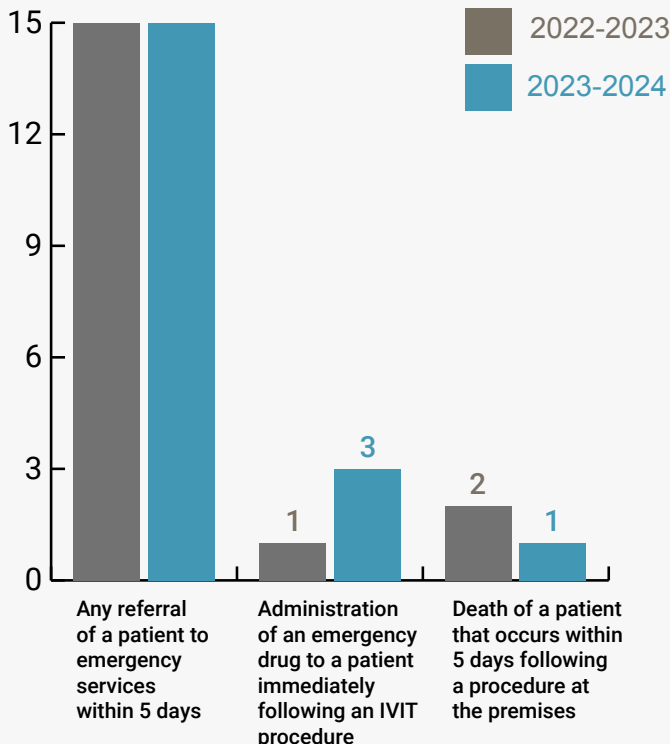
#### Registered premises

Registered premises at the start of the year: 155  
 New premises registered: 22  
 New active premises: 14  
 Premises that ceased to provide IVIT procedures: 11  
 Total premises at the end of the year: 158  
 Premises with pending inspection at end of the year: 8

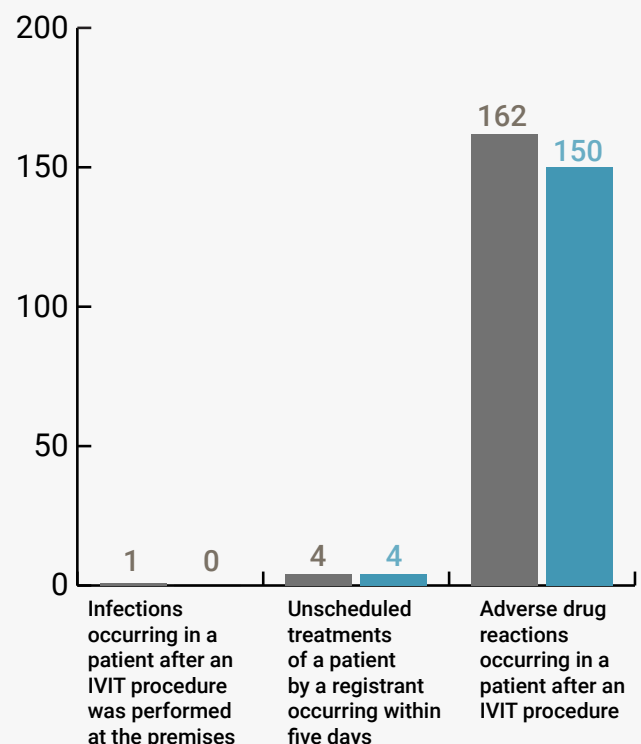
#### Inspections Completed

Inspection Type	2022-23	2023-24
Existing Premises 5-Year	38	35
New Premises – Part I	21	17
New Premises – Part II	12	17

#### Type 1 Occurrence Reports Received:



#### Type 2 Occurrence Reports Received:



## STRATEGIC OBJECTIVE #2

### Inspection Committee Decisions on Inspection Reports

Outcome	2022-23	2023-24
Final outcome of a pass	47	45
Preliminary outcome of a pass with conditions & final outcome of a pass	23	26
Preliminary outcome of a pass with conditions & final outcome of a pass with conditions	2	1
Preliminary outcome of a pass with conditions, final outcome not delivered in the same fiscal year	3	3
Preliminary outcome of a fail and a final outcome of a pass	0	0

### Standards Program

The College is mandated under the RHPA to develop, establish and maintain standards of practice for naturopathic doctors, to assure the quality of the practice of the profession. These standards describe the expected level of performance for specific elements of practice, to which all NDs are required to adhere, to ensure quality and safety in the provision of these professional services to the public. The public should feel confident their ND is held to a high standard when they seek naturopathic care.

The standards of practice guide the professional knowledge, skills and judgement needed to practise naturopathy safely and set the minimum expectations that must be met by any ND in any setting. The College has established and maintains 28 standards of practice and 11 practice guidelines. These documents are consistently updated to incorporate current legislative and health care system requirements.

The Standards of Practice and related guidelines are overseen by the Standards Committee of the College. Established by the Council, the Standards Committee has a high degree of independence from the Council to review and update standards and develop new standards as needed.

#### STATS AT A GLANCE

Standards reviewed: 19

### Registrants of the College & Currency

Through the Registration Program, the College ensures its registrants maintain their certificate of registration in accordance with applicable sections of the College's by-laws, the Registration Regulation and registration policies. This includes administering the annual collection of information and fee (registration renewal) and auditing reported practice hours as part of ensuring ongoing currency of knowledge and skills.

## STATS AT A GLANCE

Total Registrants: 1,867

New Registrants in 2023: 84

### Five Year Growth

Year	2019	2020	2021	2022	2023
General Class	1516	1531	1550	1613	1667
Inactive Class	169	179	168	171	172
Life Registration	19	23	23	24	28

*In addition to new registrants each year, these numbers will also vary as some registrants will change class, resign or have their certificate revoked.*

### Changes to Registrant Class & Status

Outcome	2022-23	2023-24
Class Change (From the general class to the Inactive class)	35	25
Class Change (from the inactive class to the general class (under 2 years <sup>5</sup> )	12	8
Class Change (from the inactive class to general class (over 2 years <sup>6</sup> )	0	1
Class Change (any class to Life Registrant status)	2	4
Resigned	31	27
Revoked <sup>7</sup>	7	11
Reinstated (suspension lifted)	9	9

*Registrants of the College will change between classes for various reasons. Most often, the change is between the General class and the Inactive class (e.g., to accommodate a maternity/parental leave). Suspensions will occur if a registrant does not renew their annual registration or fails to maintain the requirements associated with their certificate of registration, such as professional liability insurance or cardiopulmonary resuscitation certification.*

<sup>5</sup>In this type of change, the registrant would have been in the Inactive class for less than two years.

<sup>6</sup>In this type of change, the registrant would have been in the Inactive class for two years or more which results in added requirements to be met to affect the class change.

<sup>7</sup>Revocation of a certificate of registration occurs two years after the certificate was administratively suspended if the reason for the suspension is not addressed.



## STRATEGIC OBJECTIVE #2

### Professional Corporations

Naturopaths can incorporate under the *Business Corporations Act* to practice their profession. Registrants must apply for and receive a Certificate of Authorization from the College, which involves both an application and evaluation process, and must renew their Certificate of Authorization on an annual basis. The Registration and Examinations area oversees the issuance and renewal of these Certificates.

#### STATS AT A GLANCE

	2022-23	2023-24
Corporations authorized at start of year	98	112
New corporations approved	14	17
Corporations revoked	0	2
Corporations closed by registrant	0	1
Corporations authorized at the end of the year	112	126

*Professional corporations are issued a certificate of authorization by the College which must be renewed annually. If it is not renewed, it will be revoked by the College.*

### Patient Relations Program

Under the legislation governing the College, the mandated Patient Relations Program focuses on preventing and addressing patient sexual abuse. It achieves this by:

- Setting educational standards for registrants,
- Establishing conduct guidelines for patient interactions,
- Training College staff, and
- Disseminating information to the public.

The program, overseen by the Patient Relations Committee, also includes funding for therapy and counselling to support patients who may have experienced sexual abuse by a naturopathic doctor.

To-date, the Committee has approved funding in the amount of \$47,146.40 for counselling and therapy for Ontario patients of NDs. Additionally, the Committee revised its policies to align with program objectives, developed boundary scenarios for professional communications, and initiated a review to potentially extend funding eligibility periods.

#### STATS AT A GLANCE

Type of Change	2022-23	2023-24
On-going approved funding	0	5
New applications received	5	0
New applications approved	5	0
Funding provided	\$9,895	\$5,080.80

*Each approved application is eligible for funding of up to \$17,300 for counselling. Actual amounts paid are based on the needs of the patient as determined by their counsellor.*

## Complaints, Reports & Fitness to Practice

### Complaints/Reports

The College receives and investigates complaints and reports about the practice and conduct of naturopaths. The Inquiries, Complaints, and Reports Committee (ICRC) reviews all complaints, and at the CEO's request, may approve and conduct investigations if there are reasonable grounds to believe a naturopath has engaged in professional misconduct or is incompetent. Following an investigation, the ICRC may, among other things, decide to take no action, mandate educational or remedial activities, or refer the case to the Discipline Committee or the Fitness to Practise Committee for a hearing.

The ICRC's important role with the College ensures accountability and maintains high standards within the naturopathic profession. By thoroughly investigating complaints and reports, the College protects the public from potential harm caused by professional misconduct or incompetence. The ICRC plays a crucial role in safeguarding patient safety and trust in naturopathic care by addressing concerns and taking appropriate actions. This process not only promotes ethical and competent practice but also reinforces the College's commitment to upholding the integrity and reputation of the profession.

In our commitment to transparency, our website includes anonymized summaries of outstanding investigations. We are the first health regulatory College in Ontario to publish such summaries.

In response to the complaints and reports reviewed, the ICRC may take any of the following decisions:

- Take no further action if evidence is insufficient.
- Issue a Letter of Counsel.
- Require completion of continuing education or a remediation program.
- Require the registrant to appear before the ICRC for a caution.
- Accept an undertaking to improve or restrict practice.
- Accept an undertaking to resign and never reapply for registration.
- Refer allegations of professional misconduct or incompetence to the Discipline Committee.
- Refer the matter to another ICRC panel for incapacity proceedings if there's concern about the Registrant's capacity.

All complaint decisions made by the ICRC can be appealed to the Health Professions Appeal and Review Board (HPARB).

## STRATEGIC OBJECTIVE #2

### Fitness to Practice

When the College receives information suggesting that a naturopath may be incapacitated, the CEO investigates and reports to a Health Inquiry Panel of the ICRC. The Panel may conduct inquiries, including independent medical examinations, and may refer the matter to the Fitness to Practise Committee if appropriate. The ICRC may also refer formal complaints to a separate Health Inquiry Panel.

Incapacity, as defined in the RHPA, refers to a physical or mental condition or disorder that warrants imposing terms, conditions, or limitations on a registrant's practice or revoking their ability to practise in the public's interest.

As of March 31, 2024, the ICRC had two ongoing inquiries into the potential incapacitation of registrants. However, no referrals to the Fitness to Practise Committee were made during the reporting period.

### STATS AT A GLANCE

#### Complaints and Inquiries

	2022-23	2023-24
New complaints received	17	16
New CEO Inquiries initiated	7	5
Matters closed by ICRC	42	23

*Although complaints may be received in a given program year, the time needed to investigate the matter usually means that they will continue into one or more subsequent years.*

#### Origins of CEO inquiries

	2022-23	2023-24
Public inquiries	4	1
Matters reported by registrants	0	0
Matters reported by other programs	2	3
Referral from ICRC to CEO	1	0
Referral from another regulator	0	0
Referral from the QA Committee	0	1

*CEO Inquiries are initiated upon approval of the ICRC and are requested based on information received by the College but that are not included in a formal complaint filed with the College.*

## Topics of Complaints / CEO Investigations

	2022-23	2023-24
Advertising	6	5
Inappropriate billing procedures	5	5
Inappropriate/unsatisfactory patient care	8	8
Practising outside their scope	8	1
Failure to comply with the Standard for IVIT/Injections	0	0
Sexual abuse, violation of professional boundaries	1	2
Failure to cooperate or comply with an order of Discipline Committee/ICRC	1	1
Practising while Inactive/Suspended	2	1
Record keeping	3	1
Lab Testing	0	1
Delegation	1	0
Harassment	1	0
QA Program comply	1	1
Failure to cooperate	1	1
Unprofessional, unbecoming conduct	6	4

*The ICRC continues to address trends related to the advertising of services that naturopaths are not authorized to perform, such as Intravenous Infusion Therapy and cancer care. In addition to taking actions in response to complaints—including referrals to the Discipline Committee—the College is committed to enhancing guidance for naturopaths on these issues. This includes publishing advisories and providing updates through our [iNformeD](#) newsletter and the [College website](#).*

## STRATEGIC OBJECTIVE #2

### Decisions of the Inquiries, Complaints & Reports Committee

	2022-23	2023-24
TOTAL decisions	42	23
No further action	10	3
Letter of Counsel	10	6
Oral Caution	2	2
Specified Continuing Education & Remediation Program (SCERP)	3	2
Oral Caution & SCERP	4	9
Letter of advice/counsel & SCERP	2	0
Acknowledgement & Undertaking	1	0
Referral to Fitness to Practise Committee	0	0
Referral to Discipline Committee	9	0
Frivolous and vexatious	0	0
Withdrawn – No further action required	1	1

*Certain decisions of the ICRC are mutually exclusive of others, for example, to take no further action, accept a withdrawal request, determining a matter is frivolous or vexatious, or a referral to the Discipline or Fitness to Practice Committees. Other outcomes may be done alone or in combination, these include a letter of counsel, an oral caution, a SCERP and an Acknowledgement & Undertaking.*

### Investigation Timelines of Complaints & Reports

Time in Days	2022-23	2023-24
Average length	195	237
Shortest	8	105
Longest	373	508

*Under legislation governing the College, complaints must be resolved within 150 days. If this timeframe cannot be met, the complainant, the registrant, and the Health Professions Appeal and Review Board (HPARB) are notified every 30 days.*

### Costs for matters resolved By the ICRC

Time in Days	2022-23	2023-24
Average length	\$2,866	\$6,463
Shortest	\$9,598	\$15,587
Longest	\$150	\$300

*The cost of an investigation includes the College's legal expenses, fees for formal investigators and experts (where required), ICRC per diems, and mailing costs.*

## Hearings

Hearings of the College of Naturopaths of Ontario may be held under the auspices of one of two independent Committees: the Discipline Committee and the Fitness to Practice Committee.

The Discipline Committee holds hearings to determine whether a registrant of the College has committed an act of professional misconduct or was incompetent. The Fitness to Practice Committee holds hearings to determine whether a registrant of the College is incapacitated, that is, suffers from physical or mental condition or disorder that would make it desirable in the public interest that the registrant should no longer practice or should practice under certain terms, conditions and limitations placed on them by the panel of the Committee

### STATS AT A GLANCE

Hearings Conducted:

	2022-23	2023-24
Fitness to Practice		
Referred in prior years	0	0
Referred in current year	0	0
Hearings Completed	0	0
Discipline		
Referred in prior years	5	3
Referred in current year	5	0
Hearings Completed	7	1

*At the beginning of 2022-23, the Discipline Committee had five matters referred to it from prior years and five matters were referred in that year. Seven of those matters were completed in 2022-23 and three matters were carried forward into 2023-24. One of those was completed this year. For an understanding of the time taken for discipline matters, please refer to the [Discipline Process](#) page on the College's website.*

Outcomes of Panels of the Discipline Committee:

	2022-23	2023-24
Discipline hearings completed	7	1
Findings of professional misconduct	7	1
Number of hearing days	9	12
Number of referrals from ICRC	9	0
Fitness to Practise hearings	0	0
Reinstatement of registrant	0	0

*Although 12 days of hearings were held in 2023-24, 11 of those pertained to the two matters before panels of the Committee that are on-going into the next program year.*

## STRATEGIC OBJECTIVE #2

Matter	Data
CoNO & Colbran Marjerrison	
Hearing date	August 9, 2023
Decision & Reasons	September 12, 2023
Outcome	Registrant found to have committed an act of professional misconduct.
Legal costs	\$30,269
Investigation costs	\$7,245
Hearing costs	\$886
Total cost to CoNO	\$38,400
Ordered costs	\$7,500
Ordered costs as %	19% of total costs to CoNO

*A discipline panel may order a registrant who has been found to have committed acts of professional misconduct to pay all or part of the College's costs and expenses for the investigation as well as for prosecuting the registrant before the Discipline Committee. The awarding of costs is determined on a case-by-case basis. Ordered costs will vary depending on whether the matter is contested, where the benchmark is 66% of costs, or the matter is uncontested, where the College's benchmark is 15%-40%.*

### Discipline Decision Summaries

Full discipline decisions are available on the online [Public Register](#) under the Registrant's profile and on the [Discipline Outcomes](#) page of our website.

### CoNO & Colbran Marjerrison (CoNO file DC22-06)

A one-day hearing was held on August 9, 2023, before a panel of the Discipline Committee on the matter of the College of Naturopaths of Ontario and Colbran Marjerrison. The matter was uncontested, with the panel issuing an order on the day of the hearing and a full Decision & Reasons was issued by the panel on September 12, 2023.

### Summary of the allegations:

This matter was initiated based on a self-report from the Registrant, as well as a complaint (mandatory report) filed by another regulated health professional and a complaint from the patient. At the conclusion of its investigation, the Inquiries, Complaints and Reports Committee referred to the Discipline Committee the following specified allegations of professional misconduct about the Registrant:

- Concurrent therapeutic and sexual relationships with a patient.
- Sexual abuse of a patient, more specifically sexual intercourse or other forms of physical sexual relations between the Registrant and the patient.
- Abusing a patient verbally, physically, psychologically or emotionally.
- Acting in a conflict of interest when acting in a professional capacity.
- Failing to keep records in accordance with the standards of the profession.
- Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional; and
- Engaging in conduct that would reasonably be regarded by members as conduct unbecoming a member of the profession.

## Admission of Professional Misconduct

A Joint Submission as to Penalty and Costs was agreed upon prior to the hearing. The parties submitted that the public was protected because the Registrant had accepted responsibility for their actions and had agreed to an appropriate penalty.

## Order

The Discipline Panel imposed the following order:

1. Requiring the Registrant to appear before the panel to be reprimanded immediately following the hearing of this matter.
2. Directing the CEO to revoke the Registrant's certificate of registration effective immediately.
3. Requiring the Registrant to reimburse the College for funding for therapy and counselling provided to the Patient under the program required under section 85.7 of the Code, up to the maximum allowable amount of \$17,370.
4. Requiring the Registrant to pay costs to the College in the amount of \$7,500.00 on a schedule to be determined by the CEO.

The Panel concluded that the proposed penalty was reasonable and in the public interest, and that it satisfied the principle of public protection

## Unauthorized Practice

The College monitors and addresses cases where individuals advertise themselves as naturopaths or naturopathic doctors or offer naturopathic services without being registered with the College. These individuals, termed "unregulated" or "unauthorized" practitioners, are practising illegally. The College responds by issuing cease and desist letters and may pursue legal action through the courts seeking an injunction from the court to stop the individual from holding themselves out as an ND. Additionally, the names

of unauthorized practitioners are published in the Unauthorized Practitioner Register to inform the public and safeguard against illegal practice.

## STATS AT A GLANCE

Cease & Desist Letters	2022-23	2023-24
Letters sent	4	6
Signed back	3	5

*A C&D letter outlines the concerns and asks the individual to agree to stop practising and to sign the letter back indicating they have stopped*

Court Injunctions	2022-23	2023-24
Injunctions sought	0	1
Injunctions issued by the court	0	0

*At the end of the reporting period, the matter was still before the courts; however, the injunction was granted in the following year.*

## Quality Assurance Program

The College's Quality Assurance (QA) Program, overseen by the Quality Assurance Committee (QAC), ensures that naturopaths stay current to provide quality care for Ontarians. The program also supports naturopaths in improving their practice through remedial activities when needed. All General Class naturopaths must participate in the program, demonstrating a commitment to ongoing learning and improvement.

Quality Assurance (QA) Program Components:

1. **Self-Assessment:** This component helps naturopaths reflect on their skills in relation to the core competencies and standards of practice.



## STRATEGIC OBJECTIVE #2

### 2. Continuing Competency and Professional Development:

General Class naturopaths must participate in 70 hours of Continuing Education (CE) every three years, through a mix of Category A (i.e., structured learning activities that address the core clinical competencies approved by the College) and Category B courses (i.e., self-directed learning activities of any type and in any area the registrant chooses). Those providing IVIT must complete an additional six credits of clinical learning. Registrants can also undertake additional credits to further their professional development.

**3. Peer and Practice Assessment:** Each year, a group of General Class registrants is randomly selected for an objective review of their knowledge and performance by trained assessors, who are also practicing naturopaths. Peer and practice assessments may also be conducted based on recommendations from the QAC, particularly for registrants who have not met Continuing Education (CE) requirements.

### STATS AT A GLANCE

#### Self-Assessments

Completed by registrants: 1,644

#### Continuing Education

Logs files by registrants: 469

#### Peer & Practice Assessments

Assessments Completed: 90

### Peer & Practice Assessment Outcomes

Outcome	2022-23	2023-24
Demonstrated the knowledge, skill and judgment to meet the standards	84	78
Fell below the standards in at least one component of the assessment and were referred to the QAC	8	12

*Peer & Practice Assessors evaluate registrants on a set of criteria. That assessment results in a determination of whether the registrant has demonstrated the knowledge, skill & judgment to meet the standards. Those who do not, must undergo a review by the QAC.*

### Quality Assurance Committee Review Outcomes

Review Outcome	2022-23	2023-24
Knowledge, skill and judgement deemed satisfactory	8	10
Term, condition or limitation imposed by QAC	0	2

*The QAC reviews Peer & Practice Assessments where deficiencies have been identified by the assessor, along with submissions from the registrant. The QAC will then make a determination of whether the registrant has the knowledge, skill and judgement or requires a TCL.*

### **Continuing Education Credit Applications**

Applications Received: 381

Approved for Category A: 306

### **Breakdown of CE Accredited Courses by Category**

General Category A: 186 (61%)

Prescribing/Pharmacology: 89 (29%)

IVIT: 14 (4%)

Jurisprudence: 17 (6%)

### **Breakdown of CE Accredited Courses by Delivery Type**

Webinar: 107 (35%)

In-person/live: 199 (65%)

## **Review of Regulations, By-laws and Standards**

The strategic priorities set by the Council include a review of the regulatory framework, the regulations, by-laws and standards, to maximize the public protection benefit to Ontarians. In 2023-24, the College reviewed its by-laws to ensure that they are up-to-date and robust, and the Standards Committee reviewed 19 Standards which will be the subject of a consultation process in the coming year.

Other activities will be undertaken over the next three program years on this longer-term project.

# A Profile of the Profession

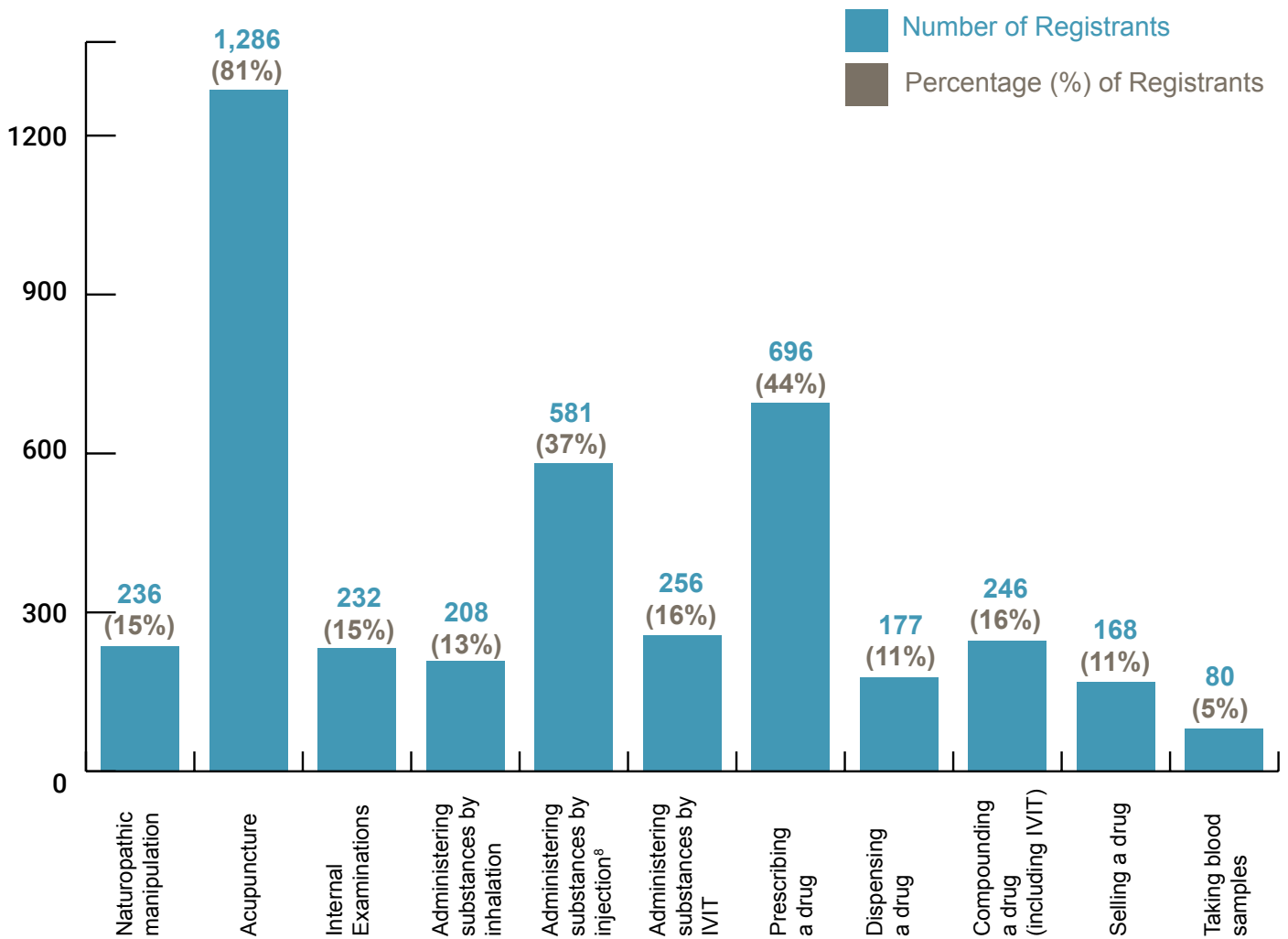
In the winter of 2023, the College initiated its annual renewal process for registrants of the College. This year, for the first time, the College collected data about registrants' practices to be able to gauge the breadth and depth of the profession. We are pleased to release publicly the results of this first data collection. For reference, 1,749 registrants completed their annual return, however, 168 of those were in the inactive class in 2023 or held a non-clinical term, condition or limitation on their registration and could not see patients.



# A Profile of the Profession

## Controlled Acts

Controlled acts are high risk procedures that are restricted to regulated health professions that are authorized in their legislation to perform them. In the case of Naturopathic Doctors, section 4 of the *Naturopathy Act, 2007*, authorizes NDs to perform certain controlled acts. All 1,746 registrants reported performing at least one controlled act in 2023; however, we asked registrants to indicate which they perform as part of their practice.



For a registrant to administer drugs by inhalation or injection (including intravenous infusion therapy) or to prescribe, dispense, compound or sell a drug, registrants must first have met the Standard of Practice for Prescribing. At the end of 2023, 861 (49%) registrants had met the standard.

<sup>8</sup> Excludes administering a listed substance by intravenous infusion therapy (IVIT) registrant has the knowledge, skill and judgement or requires a TCL.

## Patient base

The College asked registrants to report two numbers relating to their patient base, the overall number of patients in their practice(s) and the number of patient visits they had in 2023. Overall, the profession is estimated to have 998,473 Ontarians as patients in their practices, an average of 553 per registrant. In 2023, there were 1,166,342 patient visits, an average of 646 patient visits per registrant in that year.

## Practice Type

While many NDs may practise at more than a single location, each are required to designate one location as their primary practice location, usually the location where they provide services the most often. We asked registrants to identify the type of practice location for their primary practice.

Practice Type	# of Registrants	% of Registrants
Independent Practitioner ( <i>brick and mortar clinic</i> )	471	27%
Independent Practitioner ( <i>Telepractice</i> )	236	14%
Clinic with other NDs	256	15%
Multi-disciplinary practice	675	39%
Non-clinical ( <i>do not see patients</i> )	41	2%
Not in the General class in 2023	127	7%

Like all health professions, there will be variability in the data year over year. The collection of the data will allow the College to identify trends of changes the profession may be encountering and whether those changes represent a risk of harm to patients.

# A Tribute to our Volunteers

Each year, volunteers contribute over 40,000 hours to support the College and its regulatory functions. This includes over 60 meetings annually, with more than 100 registrants serving as assessors, examiners, IVIT inspectors, and members of various committees and working groups. These volunteers often dedicate full days to their roles, including exam item writing and development.



# Thank You

Our volunteers come from several sectors, most of whom are Naturopathic Doctors from both the General and Inactive classes of registration. Our public representatives and Public members appointed by government generally come from the finance, marketing, and non-profit sectors.

Without our volunteers, the College could not perform all of its required regulatory roles. To maintain the integrity of our regulatory processes and protect volunteer privacy, we do not identify individual volunteers by name, except those elected or appointed to the Council. Despite not naming them individually, their support is crucial for the College's operations.

On behalf of the Council and staff, we extend our deepest gratitude to all our volunteers for their dedicated work in reviewing materials, attending meetings, conducting assessments, and providing valuable feedback.

# Financial Statements

The College is including an abridged version of the Audited Financial Statements for the period April 1, 2023, to March 31, 2024, in this report to provide the reader with the overall outcomes for the fiscal year.





# Note to the Summary Financial Statements Report

The summary financial statements report has been prepared from the audited financial statements of the College for the year. The information in the summary financial statements report is in agreement with the related information in the complete financial statements and contains the necessary information to avoid distorting or obscuring matters disclosed in the related [complete financial statements](#). However, any notes identified in the statements themselves have not been included in this report; they are included in the complete audited financial statements which are available on the College website and may also be obtained by emailing us at [general@collegeofnaturopaths.on.ca](mailto:general@collegeofnaturopaths.on.ca).

## Summary Financial Statements Report on the Audit of the Financial Statements

### Opinion

We have audited the financial statements of The College of Naturopaths of Ontario, which comprise the statement of financial position at March 31, 2024, and the statements of changes in net assets, operations, and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies. In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of The College of Naturopaths of Ontario at March 31, 2024, and the results of its operations and its cash flows for the year then ended, in accordance with Canadian accounting standards for not-for-profit organizations.

### Basis for Opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Financial Statements section of our report. We are independent of The College of Naturopaths of Ontario in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and

we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with Canadian accounting standards for not-for-profit organizations, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error. In preparing the financial statements, management is responsible for assessing the College's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the College or to cease operations, or has no realistic alternative but to do so. Those charged with governance are responsible for overseeing the College's financial reporting process.

### Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole

are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian generally accepted auditing standards will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian generally accepted auditing standards, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the College's internal control. Evaluate the appropriateness of accounting policies used and the reasonableness

of accounting estimates and related disclosures made by management.

- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the College's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the College to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Kriens-Larose LLP  
Chartered Professional Accountants  
Licensed Public Accountants

## Summary Statement of Financial Position As of March 31, 2024

Assets - Current	2024 (\$)	2023 (\$)
Cash and cash equivalent	4,062,890	3,948,678
Accounts receivable	1,563,694	1,390,840
Prepaid expenses	132,826	131,369
<b>TOTAL</b>	<b>5,759,410</b>	<b>5,470,887</b>

Equipment	48,090	40,506
<b>TOTAL</b>	<b>5,807,500</b>	<b>5,511,393</b>

Liabilities - Current	2024 (\$)	2023 (\$)
Accounts payable and accrued liabilities	334,409	314,630
Deferred revenue	3,147,915	2,985,053
HST payable	336,564	315,358
<b>TOTAL</b>	<b>3,818,888</b>	<b>3,615,041</b>

Net Assets	2024 (\$)	2023 (\$)
Unrestricted net assets	(254,457)	(332,156)
Patient Relations	90,385	90,385
Business Continuity	1,093,584	1,083,877
Investigations and Hearings	1,009,100	1,004,246
Succession Planning	50,000	50,000
<b>TOTAL</b>	<b>1,988,612</b>	<b>1,896,352</b>

	2024 (\$)	2023 (\$)
<b>TOTAL</b>	<b>5,807,500</b>	<b>5,511,393</b>

## Statement of Changes in Net Assets For the Year Ended March 31, 2024

	2024 (\$)	2023 (\$)
Balance, beginning of the year	1,896,352	1,905,406
Balance, end of year	1,988,612	1,896,352

## Summary Statement of Operations For the Year Ended March 31, 2024

Revenues	2024 (\$)	2023 (\$)
Registration and member renewal fees	3,134,941	2,879,081
Examination fees	306,625	307,726
Inspection and hearing fees	135,583	221,883
Investment income	117,118	47,039
Incorporation fees	35,839	30,900
Misc income	26,070	1,363
<b>Total Revenues</b>	<b>3,756,176</b>	<b>3,487,992</b>
<b>Total Expenses</b>	<b>3,663,916</b>	<b>3,497,046</b>
Excess (Deficiency of Revenues Over Expenses for the Year)	92,260	(9,054)

Expenses	2024 (\$)	2023 (\$)
Salaries and Benefits	2,186,626	1,880,527
Rent and utilities	173,857	262,952
Exam fees and expenses	232,046	250,552

Expenses	2024 (\$)	2023 (\$)
<b>Consulting Fees</b>		
Consultants – complaints and inquiries	64,766	105,719
Consultants – general	40,167	96,460
Consultants – Assessors/inspectors	42,928	45,312

<b>Expenses (Continued)</b>	<b>2024 (\$)</b>	<b>2023 (\$)</b>
<b>Legal Fees</b>		
Legal fees – discipline	267,579	190,650
Legal fees – complaints	51,299	73,955
Legal fees – general	20,231	15,683
<b>Council fees and expenses</b>	137,270	152,814
Office and general	91,701	90,116
Public education	84,721	64,952
License	58,741	53,657
Equipment maintenance	50,530	49,793
Translation	37,751	42,260
Insurance	33,448	32,682
Audit fees	17,621	16,394
Travel accommodation and meals	17,495	8,484
Education and training	16,050	7,775
Discipline and FTP committee	13,759	13,779
Amortization	11,759	21,425
Patient relations fund expenses allocation	4,810	9,615
Website	3,891	3,575
Printing and postage	3,608	2,680
Patient relations Committee	1,262	1,029
Loss on disposal of furniture	-	4,216
<b>TOTAL EXPENSES</b>	<b>3,663,916</b>	<b>3,497,046</b>



## College of Naturopaths of Ontario

**The College is not a school or educational facility.  
It exists to protect the public and patients' rights to safe,  
competent and ethical naturopathic care.**

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