

Fair Registration Practices Report

Homeopaths (2017)

The answers seen below were submitted to the OFC by the regulated professions.

This Fair Registration Practices Report was produced as required by:

- the Fair Access to Regulated Professions and Compulsory Trades Act (FARPACTA) s. 20 and 23(1), for regulated professions named in Schedule 1 of FARPACTA
- the Health Professions Procedural Code set out in Schedule 2 of the Regulated Health Professions Act (RHPA) s. 22.7 (1) and 22.9(1), for health colleges.

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1. Qualitative Information

a) Requirements for registration, including acceptable alternatives

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

b) Assessment of qualifications

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

c) Provision of timely decisions, responses, and reasons

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

d) Fees

i. Describe any improvements / changes implemented in the last year.

CHO introduced and/or implemented two new fee changes in 2017:

1. Substantially Equivalent Competence Assessment Fee

On April 1, 2017, the CHO implemented a fee for the Substantially Equivalent Competence Assessment (SECA). This fee relates only to an individual who is not a graduate of an approved program in homeopathy in Ontario.

A fee of \$150 + HST is required at the time the individual submits their SECA form and educational documentation for review. These documents are reviewed by staff to determine if the individual's education and training is substantially equivalent to that of a graduate of a CHO approved program in homeopathy. Prior to April 1, CHO conducted the SECA assessment without cost.

2. Annual Renewal Fee Increase

On October 25, 2017 Council approved in principle for 60-day consultation an increase in the annual renewal fee from \$850 + HST to \$1,250 + HST, effective February 15, 2018. The consultation period ran until January 24, 2018, and on February 7, 2018 Council is to review feedback and make a final vote on proposed bylaw amendment.

ii. Describe the impact of the improvements / changes on applicants.

1. Substantially Equivalent Competence Assessment Fee

The SECA process was implemented in 2016, and the fee, which required 60-day consultation, was implemented on April 1, 2017. The SECA process is a pre-assessment process to determine eligibility for registration in the college. In order to submit a completed SECA pre-assessment package, individuals must submit the required documentation (forms, transcripts, course details, syllabus, etc...) as well as a fee of \$150+HST which is paid directly to the CHO by certified cheque or credit card. The fee to review the educational and training documents is minimal. It is understood that applicants may be required to incur other expenses in order to receive transcripts and pertinent documentation from academic and training providers.

2. Annual Renewal Fee Increase

In the proposed bylaw changes the initial registration fee for the first 12 months of registration remains unchanged at \$850 + HST. This recognizes that there are other fees associated and provides for a transition into registration, allowing new registrants to better manage their costs leading up to and upon entry to the College. CHO offers prorating of fees for the first year and accommodations can be made for payment by installment.

iii. Describe the impact of the improvements / changes on your organization.

1. Substantially Equivalent Competence Assessment Fee

The process of determining eligibility is lengthy and adds an additional, but necessary, level of intense review. The addition of a nominal pre-assessment fee (\$150) allows the College to recoup a small portion of the cost to review an applicant's qualifications through the substantially equivalent provision of the Registration Regulation. The fee also encourages commitment and follow-through on the part of the individual, without being overly onerous.

2. Annual Renewal Fee Increase

Prior to proclamation the transitional Council initially looked at the costs to operate a small regulatory college, which were estimated, at the time, in the range of \$1 million to \$1.2 million. Based on an estimated registrant pool of 550-600, Council determined that a registration fee sufficient to cover expenses would be approximately \$1,800 + HST and set the fee accordingly. After much deliberation, it was decided that this fee was simply too high for a profession new to regulation and facing other fees related to first-time registration. The decision to reduce the fee to \$850 + HST was a difficult one, as it meant drawing down on some of the College's reserve. Even so, the transitional Council recognized the importance over the longer term of making it possible for every eligible practitioner to become a registrant without barriers.

During the three years since proclamation, annual registration fees have stayed the same at the lowest possible level, recognizing that homeopaths would need time to adjust and to begin to operating within a regulatory environment. Since March of 2016, the College has been entirely funded by registration and application fees. Financial projections have been based on achieving particular membership goals, which have been met but more slowly than anticipated. In order to keep fees at their initial level, expenses have been cut to the barest minimum, with the overall staff complement having decreased from eight to four over the last two years.

Moving into its fourth year of operation (2018-2019), the College has set renewal fees at a level that more accurately reflects the actual costs of running a small regulatory body but is still significantly less than initial estimates. With a mandate the same as that of larger Colleges, the CHO has to be able to carry out its multiple roles on a day-to-day basis as well as respond to an increasingly challenging regulatory environment. With careful planning and resource management, it is believed this can likely be accomplished at current staffing levels provided financial stability is achieved.

However, from a financial perspective, it is vital that the reserve be replenished and established in accordance with generally accepted accounting principles. For non-profits, a minimum of one year's operating budget is typical; however, this level represents a bare minimum for an organization such as the CHO, which could at any time be faced with the unpredictable and substantial costs of potentially lengthy and complicated complaint investigations, hearings or court challenges. Such costs are an inherent part of a regulatory environment and complex legislative structure.

For these reasons, and in particular to ensure the stability and continued effectiveness of the College in the service of homeopathy patients and practitioners, in October 2017 Council approved in principle a change to the fee bylaw allowing for an increase in the annual renewal fee from \$850 + HST to \$1250 + HST. This fee would allow the CHO to continue to carry out its statutory obligations.

e) Timelines

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

f) Policies, procedures and/or processes, including by-laws

i. Describe any improvements / changes implemented in the last year.

1. Refresher Program

In 2016, the CHO invited the academic providers of Ontario approved post-secondary programs in homeopathy to put forward proposals to offer a knowledge and skill refresher program suitable for applicants requiring theory and/or clinical refreshment. The intent of the refresher program structure may be suitably used by applicants or registrants as determined by the Registrar, Registration Committee or any other statutory committee of the College. In January 2017, the CHO Registration Committee approved one Refresher Program, which immediately began offering services to applicants who demonstrated gaps in their education and/or clinical training, such that refreshment was appropriate to bring them to an entry-to-practice level.

The Refresher Program covers the following:

- The program is established on a minimum basics framework with built-in flexibility to accommodate variation based on the College of Homeopaths of Ontario's (CHO or the College) review of each individual's unique situation.
- The program is educational in nature and is an interactive supervised clinical practice experience which evaluates the participant's knowledge, skill and judgment in a clinical environment.
- The program is instructive and influences the participant's case-taking and analysis approach to patient care to ensure the CHO attitudinal, Ontario-specific, and general clinical competencies are understood and incorporated into practice.
- The program is progressive in nature with the participant's successful completion of a minimum number of live patient cases resulting in the demonstration of the specific clinical and theory competencies. Includes observation, mentoring and evaluation of core case-taking competencies with a focus is on proficient process.
- The program incorporates components of practice which are specific to the Ontario health-care environment including informed consent, record keeping, and privacy and confidentiality.
- The program provides the participant with an opportunity to clearly demonstrate his/her ability to a clinical supervisor.

The program is based on the *CHO Entry-to-Practice Competency Profile for Homeopaths Practising in Ontario*, *CHO Professional Practice Standards and Guidelines*, as appropriate, and the *Ontario Regulation 18/14 Registration* requirements.

2. Change in Professional Practice Liability Insurance Bylaw

In March 2017, CHO Council approved changes to the Professional Liability Insurance bylaw to reduce the aggregate insurance requirement **from** no less than \$5,000,000 annually **to** no less than \$2,000,000 annually. The bylaw change reduced a barrier to practice and improved ease of renewal, specifically for those applicants/registrants registered in dual professions. Council agreed that the reduced coverage would not inhibiting public protection and still provides adequate public protection to patients in potential liability claims.

ii. Describe the impact of the improvements / changes on applicants.

1. Refresher Program

The competency-based, clinical supervision Refresher Program is completely administrated by a third-party academic institution, which is also an approved homeopathic education provider.

The Refresher Program is considered part-time with flexibility so that the applicant may study the theory portions remotely and at their own pace. The clinical training also allows for applicant flexibility. The provider has developed

both an in-person and distance education framework suitable for homeopathy theory and clinical training.

To date, the Refresher program has been utilized by applicants with clinical training who lacked the required hours or who have been away from active practice and have been out of the education and training environment more than ten years.

The introduction of the Refresher Program has streamlined this registration related tool so that applicants needing such refreshment may commence on the program without delay. Individuals require approval from the College of Homeopaths of Ontario prior to undertaking the Refresher Program.

There is a \$1,000 cost to the applicant for the program, payable to the third-party academic institution, and pricing went into effect in early 2017. The cost is considered low and very reasonable in relation to that of other regulatory bodies.

2. Change in Professional Practice Liability Insurance Bylaw

In response to many questions from applicants and registrants, especially those who are dual registered, it became apparent that obtaining insurance requiring different aggregate amounts created both challenges and barriers for those effected. Following a review of all health regulatory colleges' insurance requirements, CHO deemed it was appropriate to lower the annual aggregate. It was further deemed that this change would not hinder public protection. The reduction in coverage levels both reduced the cost and objections by applicants/registrants.

iii. Describe the impact of the improvements / changes on your organization.

1. Refresher Program

The introduction of the Refresher Programs has streamlined the process for both the Registrar and the Registration Committee, as it has simplified the direction for applicants and potential registrants who are lacking currency in clinical experience/training or education. The Refresher Program may also be successfully modified to fill the gap for those who might be lacking in some competency areas. The program is not appropriate for those who are clearly deficient in significant core areas of homeopathy theory and clinical training.

The Registration Committee has utilized the Refresher Program to:

- address matters of currency for applicants who have previously graduated from an approved program in homeopathy more than ten years ago but lacked the minimum number of practice hours in the three year period immediately prior to submitting their application;
- ensure demonstration of the full range of core competencies for some individuals who have undergone the Substantially Equivalent Competence Assessment (SECA) to determine eligibility for registration in Full Class and who are missing competencies which can be readily remedied through:
 - i. the Refresher Program or
 - ii. the Refresher Program and other specified subject matter, so that when taken together demonstrate the full range of necessary core competencies.
- Note: This modular approach can be used for either clinical or theory based competencies.

2. Change in Professional Practice Liability Insurance Bylaw

The professional practice liability insurance bylaw change required an amendment to the registrant database which captures both new applicant and registration renewal transactions. Additionally, CHO updated all of its online and paper based materials describing insurance requirements.

g) Resources for applicants

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

h) Review or appeal processes

i. Describe any improvements / changes implemented in the last year.

The College of Homeopaths of Ontario Registration Regulation O. Reg. 18/14 provides, under section 6(1)3 and 9(1)3 that the “applicant must have successfully passed an assessment conducted by a panel of the Registration Committee, or by another body that is approved by the Council for that purpose, that demonstrates that the applicant has the necessary competencies to safely practise the profession.”

The CHO assessment conducted in a written paper-based format, which is double blind by the assessment administrator prior to it being passed to one or more trained assessors. If the submission does not pass on the first review, it is reviewed by up to two additional assessors.

Between 2014 and until the start of 2017, in accordance with CHO Individual Assessment (IA) appeals policy, all appeals of the competency based individual assessment process had been conducted by the assessment administrator Human Resources Systems Group (HRSRG). In 2017, CHO noted that approximately two percent of unsuccessful IA candidates (approximately 12 people) contacted the CHO to instigate a CHO lead appeal of their IA.

Since 2014 CHO and HRSRG have provided information sessions on how individuals may prepare materials for their assessment submission. The information sessions provide instruction on demonstration in a competency based assessment environment. Sessions do not teach the topics related to homeopathy, however, explains how homeopathy is viewed from a competency perspective.

The CHO IA appeals process starts with a trained staff member performing an oral interview with the IA candidate to determine the applicants understanding of the competencies. If the staff determines that the candidate has difficulty understanding or demonstrating the competencies, an interview is set up to assist the applicant. Under these circumstances, the Registrar may refer the file to the Registration Committee. The Committee will make a determination if they deem the candidate to be competent and will make a decision whether to issue the candidate a certificate of registration or not.

ii. Describe the impact of the improvements / changes on applicants.

The addition of the oral interview and invoking the CHO lead IA appeal provides an additional layer of review for potential registrants, and reduces the third-party appeals cost of \$350 plus HST to zero. There is typically some wait time – up to three months in some cases – for the next meeting of the Registration Committee, however, once a decision is issued the next steps happen quickly. To date the Registration Committee has approved all appeal applicants for registration, pending the successful completion of all other registration requirements.

iii. Describe the impact of the improvements / changes on your organization.

There is a time-consideration required to review the appealing IA candidate and provide a report to the Registration Committee. That said the College has determined this process to be fair, objective, and impartial, and has met with good success from all involved in the process.

i) Access to applicant records

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

j) Training and resources for registration staff, Council, and committee members

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

k) Mutual recognition agreements

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

l) Other (include as many items as applicable)

i. Describe any improvements / changes implemented in the last year.

No changes this year

ii. Describe the impact of the improvements / changes on applicants.

No changes this year

iii. Describe the impact of the improvements / changes on your organization.

No changes this year

Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year

No changes this year

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2. Quantitative Information

a) Languages

Indicate the languages in which application information materials were available in the reporting year.

Language	Yes/No
English	Yes
French	Yes

Other (please specify)

Additional comments:

b) Gender of applicants

Indicate the number of applicants in each category as applicable.

Gender	Number of Applicants
Male	9
Female	27
None of the above	0

Additional comments:

c) Gender of members

Indicate the number of members in each category as applicable. Select the option that best corresponds to the terminology used by your organization.

Gender	Number of Members
Male	175
Female	366
None of the above	0

Additional comments:

d) Jurisdiction where applicants obtained their initial education

Indicate the number of applicants by the jurisdiction where they obtained their initial education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
27	0	0	India 4 Pakistan 5 Total 9	0	36

¹ Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

e) Jurisdiction where applicants who became registered members obtained their initial education

Indicate the number of applicants who became registered members in the reporting year by the jurisdiction where they obtained their initial education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
24	0	0	India 3 Pakistan 1 Total 4	0	28

¹ Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

f) Jurisdiction where members were initially trained

Indicate the total number of registered members by jurisdiction where they obtained their initial education¹ in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
317	18	8	India 99 Pakistan 33 U.K. 19 Bangladesh 3 Greece 2 Iran 1 France 1 Ukraine 1 Germany 1	32	541

Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
			Australia 1		
			S. Africa 1		
			Romania 1		
			Sri Lanka 1		
			Israel 1		
			Russia 1		
			Total 166		

¹ Recognizing that applicants may receive their education in multiple jurisdictions, for the purpose of this question, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

Additional comments:

g) Applications processed

Indicate the number of applications your organization processed in the reporting year:

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	27	0	0	9	0	36
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	0	0	0	0	82	82
Inactive applicants (applicants who had no contact with your organization in the reporting year)	38	3	1	12	1	55
Applicants who met all requirements and were authorized to become members but did not become members	3	0	0	0	0	3
Applicants who became FULLY registered members	24	0	0	4	0	28
Applicants who were authorized to receive an alternative class of licence³ but were not issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence³	1	0	0	0	0	1

from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
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¹ An alternative class of licence enables its holder to practice with limitations, but additional requirements must be met in order for the member to be fully licensed.

Additional comments:

h) Classes of certificate/license

Indicate and provide a description of the classes of certificate/license offered by your organization.

You must specify and describe at least one class of certificate/license (on line a) in order for this step to be complete.

#	Certification	Description
		Description (a)
a)	Full Class	<p>In accordance with O.Reg 18/14, section 6. (1) the following are registration requirements for a Full certificate of registration:</p> <ol style="list-style-type: none"> 1. The applicant must have, <ol style="list-style-type: none"> i. successfully completed a post-secondary program in homeopathy in Ontario that is approved by Council or another body approved by Council for that purpose, or ii. successfully completed a program in homeopathy together with other education or training which a panel of the Registration Committee considers, when taken together, to be substantially equivalent to the requirements set out in subparagraph i. 2. The applicant must have successfully completed a program of clinical experience in the profession that is structured, comprehensive, supervised and evaluated and that is at least 45 weeks in length and includes at least 225 hours of direct client contact. 3. The applicant must have successfully passed an assessment conducted by a panel of the Registration Committee, or by another body that is approved by the Council for that purpose, that demonstrates that the applicant has the necessary competencies to safely practise the profession. 4. The applicant must have successfully completed the jurisprudence course set or approved by the Registration Committee. 5. The applicant must be certified in health

care provider CPR and standard first aid. O. Reg. 18/14, s. 6 (1).

(2) The requirements in paragraphs 1, 2, 3 and 4 of subsection (1) are non-exemptible. O. Reg. 18/14, s. 6 (2).

(3) The requirement in paragraph 4 of subsection (1) is not considered to have been met unless the applicant satisfies that requirement within the three-year period immediately before the date on which the applicant submitted his or her completed application. O. Reg. 18/14, s. 6 (3).

(4) Except in the case of an applicant to whom subsection 8 (1) applies, where the applicant has not successfully completed at least one of the requirements of paragraph 1 or 2 of subsection (1) within the 12-month period immediately before the date on which the applicant submitted his or her completed application, the applicant must have,

(a) practised the profession of homeopathy for at least 750 hours in the three years immediately before the date of the applicant's application; or

(b) successfully completed a refresher program approved by the Registration Committee within the 12 months immediately before the date of the applicant's application. O. Reg. 18/14, s. 6 (4).

(5) An applicant who either holds or is eligible to hold a Grandparented certificate of registration shall be issued a Full certificate of registration if,

(a) the applicant has successfully passed an assessment conducted by a panel of the Registration Committee, or by another body that is approved by the Council for that purpose, that demonstrates that the applicant has the necessary competencies to safely practise the profession;

(b) the applicant has paid any fees owed to the College; and

(c) the applicant has provided the College with any information that it has required of the applicant. O. Reg. 18/14, s. 6 (5).

Description (b)

Effective April 2016 the College no longer accepts applications in the Grandparented Class.

In accordance with O.Reg 18/14, section 9.1 the following are registration requirements for a Grandparented certificate of registration:

1. The applicant must have practised the profession of homeopathy for at least 750 hours during any three-year period before the date on

b)

Grandparented Class

which the applicant applied for the Grandparented certificate of registration.

2. The applicant must have submitted the completed application to the Registrar on or before the first anniversary of the day this paragraph came into force.
3. The applicant must have successfully passed an assessment conducted by a panel of the Registration Committee, or by another body that is approved by the Council for that purpose, that demonstrates that the applicant has the necessary competency to safely practise the profession as the holder of a Grandparented certificate of registration.
4. The applicant must have successfully completed the jurisprudence course set or approved by the Registration Committee.
5. The applicant must be certified in health care provider CPR and standard first aid. O. Reg. 18/14, s. 9 (1).

(2) The requirements in paragraphs 2, 3 and 4 of subsection (1) are non-exemptible. O. Reg. 18/14, s. 9 (2).

Description (c)

In accordance with O.Reg 18/14, section 12, the following are non-exemptible registration requirements for an Inactive certificate of registration:

1. The applicant must be a member holding a Full or Grandparented certificate of registration.
2. The applicant must provide an undertaking to the College in a form satisfactory to the Registrar in which the applicant undertakes to comply with the conditions set out in section 13.
3. The applicant must not be in default of any fee, penalty or other amount owing to the College.
4. The applicant must have provided the College with any information that it has required of the applicant. O. Reg. 18/14, s. 12.

c)

Inactive Class

Additional comments:

i) Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year (use only whole numbers; do not enter commas or decimals).

Jurisdiction where applicants were initially trained in the profession (before they were granted use of the protected title or professional designation in Ontario)

from January 1st to December 31st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
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Applications that were subject to an internal review or that were referred to a statutory committee of your governing council, such as a Registration Committee	13	1	1	2	0	17
Applicants who initiated an appeal of a registration decision	0	0	0	0	0	0
Appeals heard	0	0	0	0	0	0
Registration decisions changed following an appeal	0	0	0	0	0	0

Additional comments:

j) Paid staff

In the table below, enter the number of paid staff employed by your organization in the categories shown, on December 31 of the reporting year.

When providing information for each of the categories in this section, you may want to use decimals if you count your staff using half units. For example, one full-time employee and one part-time employee might be equivalent to 1.5 employees.

You can enter decimals to the tenths position only. For example, you can enter 1.5 or 7.5 but not 1.55 or 7.52.

Category	Staff
Total staff employed by the regulatory body	4
Staff involved in appeals process	2.5
Staff involved in registration process	2.5

Additional comments:

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3. Submission

I hereby certify that:

Name of individual with authority to sign on behalf of the organization:

Basil Ziv

Title:

Registrar

Date:

2018/02/28

