



# College of Homeopaths of Ontario

## Registration Policies

---

Title:	Exemptions – 750-hour Requirement
Category:	Administration
Distribution:	Internal / External
Policy Number:	REG AD 04
Status:	Final Approval from Council
Revision:	June 23, 2014 (Editorial Revisions – November 15, 2016)

---

*Note to Readers: In the event of any inconsistency between this document and the legislation that affects homeopathy practice, the legislation governs. The College has the power and authority to implement the applicable acts and regulations under the Regulated Health Professions Act, 1991. The factors outlined in this policy will be considered and every application will be reviewed on a case by case basis. If you have a question on how this policy affects your individual situation please contact the College directly.*

*It is important to note that College publications may be used by the College or other bodies in determining the interpretation of the provisions within the Homeopathy Act, 2007, its regulations and the College's Bylaws.*

### **Applicable Categories of Registration (unless otherwise noted):**

1. Applicants Full Certificate of Registration

**Type of Requirement:** Exemptible for Applicants. All sections of Registration O. Reg. 18/14 are exemptible unless indicated otherwise.

**Applicable CHO Registration Regulation:** 6(4)(a), 7(1)2.

### **Policy**

The Registration Regulation sets out requirements for entry-to-practice by Class. The requirements for the Full Certificate of Registration include practising the profession of homeopathy for at least 750-hours during the three (3) year period immediately before the date on which the Applicant applied for a Full Certificate of Registration.

Generally, clinical practice hours mean providing homeopathic service and treatment to a patient in the form of initial intake visit of a new patient or a new initial complaint from an existing patient requiring a full case-work assessment, or a follow-up visit of an existing patient. Clinical practice may be done in-person, online, by phone or other real-time live and interactive means.

Non-clinical practice hours may consist of formal professional development, academic research or paid employment related administration, supervision or teaching. Hours must not include time spent on general preparation.

Applicants should refer to Policy REG CS 04 Breakdown of Hours – Full Certificate of Registration to understand how hours are calculated and what may qualify as clinical practice or non-clinical practice hours.

If the Applicant cannot demonstrate that they have 750-hours of practising the profession over the three (3) year period immediately prior to application, the Applicant may apply for an exemption. Each request for

exemption is given individual consideration. There is no predetermined assessment of outcomes. Applicants should provide information to sufficiently support their request.

Applicants may consider requesting an exemption if the Applicant:

1. Does not have enough practice hours to meet the requirement;
2. Successfully completed their education in homeopathy more than 12 months prior to application and requires time to build a practice following completion of a program in homeopathy;
3. Is unable to prove the hours and/or need to provide alternate sources of proof of practice hours; or
4. Had previously practiced in a jurisdiction outside of Ontario and evidence of prior practice is difficult or impossible to obtain.

Under this policy proven volunteer hours or unpaid hours may be considered to demonstrate the Applicant has practiced the profession. Additionally, further profession specific continuing education or clinical experience hours are acceptable. Hours must be verifiable.

### Process

1. The Applicant completes all requirements for registration as outlined in the Registration Application Guide.
2. The Applicant submits the completed application to College and includes a Request for Exemption of Exemptible Registration Requirement form.
3. In light of the Exemption request, the Registrar refers the application to the Registration Committee.
4. In accordance with Section 15 of the Health Professions Procedural Code, the College will ensure all required notices to the Applicant and an invitation to provide further submissions are provided.
5. The Registration Committee reviews the Applicant's request and may consider the following non-exhaustive list of factors in determining if the 750-hour requirement should be exempted<sup>1</sup>:
  - i. Degree of disparity against Registration Regulation 18/14;
  - ii. Importance of disparity against Registration Regulation 18/14;
  - iii. Whether the Applicant has alternate qualifications or means/opportunities that may compensate for or fulfill the disparity (i.e. volunteer hours, teaching, administrative hours, etc.);
  - iv. Verifiability of the alternatives;
  - v. Significance of the disparity to the Applicant's proposed practice, and the degree of assurance that the Applicant's practice will not or is not likely to change.
6. After considering all of the information provided, the Registration Committee will advise the applicant of its intention to make one of the following decisions (the "proposed decision") based, in accordance with section 18(2) of the Health Professions Procedural Code:
  - i. Direct the Registrar to issue a Certificate of Registration.
  - ii. Direct the Registrar to issue a Certificate of Registration if the Applicant successfully completes examinations [or assessment<sup>2</sup>] set or approved by the panel.
  - iii. Direct the Registrar to issue a Certificate of Registration if the Applicant successfully completes additional training specified by the panel.
  - iv. Direct the Registrar to impose specified terms, conditions and/or limitations on a Certificate of Registration of the Applicant and specifying a limitation on the Applicant's right to apply under subsection 19 (1).
  - v. Direct the Registrar to refuse to issue a Certificate of Registration.
7. If the Applicant does not wish a review of the proposed decision, he or she shall inform the College.
8. The Registration Committee will provide Decisions and Reasons. However, Reasons will not be provided if the Registration Committee directs the Registrar to issue a Certificate of Registration.

---

<sup>1</sup> Points 5 i. to v. adopted from Steinecke, R, *A Complete Guide to the Regulated Health Professions Act*.

<sup>2</sup> CHO utilizes the individual assessment process.

9. The Applicant seeking a review of the proposed decision will submit a "Request for Review by a Panel of the Registration Committee" form to the College within sixty (60) days of receiving notice of the proposed decision by the Registration Committee. If the Applicant is dissatisfied with the outcome, they may seek a review, hearing or appeal (see Policy REG AD 02 Registration Appeals Process and Timelines).

## **Definitions**

### **Clinical Practice Hours**

Clinical Practice hours mean providing homeopathic service and treatment to a patient in the form of initial intake visit of a new patient or a new initial complaint from an existing patient requiring a full case-work assessment, or a follow-up visit of an existing patient. Clinical practice may be done in-person, online, by phone or other real-time live and interactive means.

### **Exemption**

An exemption removes the obligation from an individual to meet a specific requirement as outlined in regulation.

### **Non-Clinical Practice Hours**

Non-clinical practice hours must consist of formal professional development, academic research or paid employment related administration, supervision or teaching. Hours must not include time spent on general preparation.

## **Related Policies, Standards, Guidelines and Regulations**

CHO Registration Policy REG CS 04 Full Class, Breakdown of 750-Hours

CHO Registration Policy REG AD 01 Registration Appeals Process and Timelines

## ***Health Professions Procedural Code, Schedule 2 of the Regulated Health Professions Act, 1991*** **Registration**

15. (1) If a person applies to the Registrar for registration, the Registrar shall,
  - (a) register the applicant; or
  - (b) refer the application to the Registration Committee. 1991, c. 18, Sched. 2, s. 15 (1).

### **Referrals to Registration Committee**

- (2) The Registrar shall refer an application for registration to the Registration Committee if the Registrar,
  - (a) has doubts, on reasonable grounds, about whether the applicant fulfils the registration requirements;
    - (a.1) is of the opinion that terms, conditions or limitations should be imposed on a certificate of registration of the applicant and the applicant is an individual described in subsection 22.18 (1);
    - (b) is of the opinion that terms, conditions or limitations should be imposed on a certificate of registration of the applicant and the applicant does not consent to the imposition; or
    - (c) proposes to refuse the application. 1991, c. 18, Sched. 2, s. 15 (2); 1993, c. 37, s. 6; 2009, c. 24, s. 33 (3).

### **Notice to applicant**

- (3) If the Registrar refers an application to the Registration Committee, he or she shall give the applicant notice of the statutory grounds for the referral and of the applicant's right to make written submissions under subsection 18 (1). 1991, c. 18, Sched. 2, s. 15 (3).

### **Terms, etc., attached on consent**

- (4) If the Registrar is of the opinion that a certificate of registration should be issued to an applicant with terms, conditions or limitations imposed and the applicant consents to the imposition, the Registrar may

do so with the approval of a panel of the Registration Committee selected by the chair for the purpose. 1991, c. 18, Sched. 2, s. 15 (4).

#### **Panels for consent**

(5) Subsections 17 (2) and (3) apply with respect to the panel mentioned in subsection (4). 1991, c. 18, Sched. 2, s. 15 (5).

#### **Consideration by panel**

18. (1) An applicant may make written submissions to the panel within thirty days after receiving notice under subsection 15 (3) or within any longer period the Registrar may specify in the notice.

#### **Orders by panel**

(2) After considering the application and the submissions, the panel may make an order doing any one or more of the following:

1. Directing the Registrar to issue a certificate of registration.
2. Directing the Registrar to issue a certificate of registration if the applicant successfully completes examinations set or approved by the panel.
3. Directing the Registrar to issue a certificate of registration if the applicant successfully completes additional training specified by the panel.
4. Directing the Registrar to impose specified terms, conditions and limitations on a certificate of registration of the applicant and specifying a limitation on the applicant's right to apply under subsection 19 (1).
5. Directing the Registrar to refuse to issue a certificate of registration.

#### **Application for variation**

19. (1) A member may apply to the Registration Committee for an order directing the Registrar to remove or modify any term, condition or limitation imposed on the member's certificate of registration as a result of a registration proceeding. 1991, c. 18, Sched. 2, s. 19 (1).

#### ***Homeopathy Act, 2007, Ontario Regulation 18/14 Registration***

#### **Registration requirements, Full class**

(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).

#### **Terms, etc., Full class**

7. (1) Subject to subsection (2), the following are terms, conditions and limitations on every Full certificate of registration:

1. The member shall practise the profession a minimum of 750 hours during every three-year period, with the first three-year period beginning on the day that the member is issued a Full certificate of registration, and each subsequent three-year period beginning on the first anniversary of the commencement of the previous period.