



## Fair Registration Practices Report 2020

The Fair Registration Practices Report was created as required in the:

- Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) s.20 and 23(1), for the regulated professions named in Schedule 1 of FARPACTA
- Health Professions Procedural Code set out in Schedule 2 of the Health Professions Act, 1991 (RHPA) s. 22.7(1) and 22.9(1), for health colleges

Guidelines for this report are available to download as a .pdf on the OFC website.

<https://www.fairnesscommissioner.com/en/Publications/Pages/Guidelines.aspx>

Organization: College of Homeopaths of Ontario

Name of the regulated profession: Homeopathy

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## Qualitative Information

The following qualitative information is collected for the purpose of highlighting a regulator's enhancements to improve fair access year over year, including actions that result from recommendations made in the OFC's Assessment of Registration Practices.

For each of the categories below, where applicable, please describe any improvements/changes implemented in the last year by your organization or a third-party for the purpose of changing fair access.

Please also describe the impact of these improvements/changes on applicants. If you have been working on improvements/changes over the last year that have not yet been implemented, describe your progress and the expected impact the improvements/changes will have on applicants and your organization.

Provide as much detail as possible. This can include the rationale for the improvements/changes, relevant findings from preliminary work leading up to the improvements/changes, methodology, relevant dates and anything else you think is important.

Include as much supporting material as possible to support your description (e.g., relevant reports, policies, protocols, websites, other documents and anything else you think is important). This material can be provided in the form of hyperlinks to electronic sources.



In this report:

CHO means the College of Homeopaths of Ontario or “the College”.

SECA means the Substantially Equivalent Competency Assessment process, which is the full review of a candidate’s education and clinical training in homeopathy. The SECA process included both a paper review and structure one-on-one interview component. The review process seeks to understand the candidates’ knowledge and demonstrated application of a broad subset of theoretical and clinical competencies from the College’s *Competency Profile of Entry-to-Practice Competencies for Homeopaths Practicing in Ontario*. The SECA process compares the candidate’s education and clinical training and demonstrated knowledge against that required of a graduate from an approved post-secondary program in homeopathy in Ontario.



**a. Requirements for registration, including acceptable alternatives**

- i) Describe any improvements / changes implemented in the last year  
Prior to the COVID-19 pandemic, CHO's application for Full Class allowed for the online submission of an application supported by the emailed and mailed documentation from the applicant and third parties.

CHO's pre-assessment application to determine substantial equivalence (SECA) was primary paper-based with supporting documentation accepted by email and mail from the applicant and third parties.

Due to the various COVID-19 related lockdown measures, the CHO's application and pre-application submission processes were impacted, as the physical office was subject to closure and mail deliveries were delayed as a result. The CHO has quickly transitioned to a fully electronic based submission process to overcome delays which could arise as a result of the office closure and or postal service disruptions.

Although the CHO office was closed to the public, one staff member regularly attended the office, collected mail, scanned and uploaded documents to the registration staff.

For graduates of a CHO approved program in homeopathy in Ontario, College staff communicated with the schools directly to alert them of CHO's move to electronic submissions. Furthermore, programs were instructed that all copies of official transcripts and verifications from the Dean or Principal should be sent directly to the CHO Registration Department by email. Previously, the approved program administrators would send all graduate verifications and transcripts through the mail.

Similarly, for SECA applicants, the CHO is now accepting verifications from the Dean or Principal as well as official transcripts directly from international and out of province education institutions electronically. Previously, these supporting documents were only considered acceptable if received by mail from the education institutions directly.

Another modification that the CHO has made to the SECA process is the shift to exclusively electronic interviews. Prior to the College's office closure, staff



gave applicants the option to either complete their interview in-person at the CHO office, or by live interactive video (Zoom). Video interviews helped to eliminate location-based barriers.

- ii) Describe the impact of the improvements / changes on applicants  
The elimination of paper submissions has resulted in expedited overall processing times of both the pre-application (SECA) and Full Class application processes. Allowing submission by electronic means has also assisted in streamlining and simplifying the supporting documentation submission process from start to end.

The education institutions are appreciative of the amended submission requirements, as electronic submissions are sent and received quickly, and consequently are less administratively onerous to manage than hard copy mailing. This is especially helpful for international applicants, who had to physically mail the submission, incur the mailing fee to Canada, and were subject to longer wait times while their supporting documentation was in transit.

- iii) Describe the impact of the improvements / changes on your organization  
The CHO has observed that these measures have simplified the review process from a staff standpoint as well. Allowing for electronic documentation submission decreases overall processing times and simplifies the submission instructions and related communications. These measures also allow for all necessary files to be stored securely, to be readily available, and to be accessed with ease.



**b. Assessment of qualifications**

- i) Describe any improvements/changes implemented in the last year  
NO CHANGES
- ii) Describe the impact of the improvements/changes on applicants  
NO CHANGES
- iii) Describe the impact of the improvements/changes on your organization  
NO CHANGES



**c. Provision of timely decisions, responses, and reasons**

- i) Describe any improvements/changes implemented in the last year  
NO CHANGES
- ii) Describe the impact of the improvements/changes on applicant  
NO CHANGES
- iii) Describe the impact of the improvements/changes on your organization  
NO CHANGES



**d. Fees**

- i) Describe any improvements/changes implemented in the last year  
The CHO implemented amendments to bylaw 19.03 - Fee Amounts. The proposed fee increase is based on cost recovery of the SECA assessment, and the changes to Section B - Fees Relating to Applications for Initial Registration are as follows:
- To increase the fees under part 6 for Substantially Equivalent Assessment Fee from \$150.00 to \$450.00; and
  - To add part 7 for Substantially Equivalent Assessment Retake Fee, a fee in the amount of \$225.00.
- HST is applied to all fees.

The proposed fee changes were approved in principle by Council on February 27, 2020. The College conducted a 60-day public consultation from March 26 to May 31, 2020 and provided notification to potential applicants of the change. Additionally, individuals in the pre-application phase were informed of the proposed fee change and how it may impact their application. At its June 11, 2020 Council meeting, the bylaw change was formally approved. On November 1, 2020, the CHO increased the SECA (Substantial Equivalence Competency Assessment) fee from \$150 to \$450.

Prior to introducing the bylaw changes the College and the Registration Committee had substantial discussion as to whether this fee change would create an unnecessary barrier to any potential applicant wishing to determine eligibility for registration in Full Class. While the increase itself is three-fold, it is still a minimal fee to determine and review eligibility. Given the fact that the College does not require a third-party credential or individual academic review, and there are limited costs involved in the eligibility phase of registration, the Registration Committee felt that the fee was reasonable and manageable for applicants. The external costs involved in the SECA review, i.e., ordering transcripts, language testing (if required), are one-time costs and are required for either the SECA review or application for Full Class. The information applicants gather and provide to the College at the SECA phase is carried forward to the individual's application for Full Class if he/she demonstrate eligibility, this carry forward minimizes additional effort and expense to the applicant.



In coming to its conclusion, the Registration Committee, which is comprised of a culturally diverse representation of public and professional Council members, also reviewed comparable costs from all Regulated Health Professions Act regulatory bodies, which supported the Committee's belief the proposed SECA fee and re-assessment fee are substantially lower than most Colleges.

The process to review a SECA application is comprehensive and includes:

1. Administrative review by registration staff to ensure the application is complete and ready for a detailed review by the Registrar. In this process staff dialogue with applicants to address questions and facilitate the information collection process. At the appropriate point in the review process staff also coordinate an interview time with a SECA assessor.
2. First review by the Registrar (who is a member of the profession) who examines the application for demonstration that the applicants' education and clinical training meets the requirements set out in the College's Registration Regulation (O.Reg. 18/14).
3. An interview conducted by a trained SECA assessor (who is paid for interview preparation, interview time, and results report preparation).
4. The Registrar reviews the totality of the individual's application (paper-review and interview results) and determines if the applicant has demonstrated substantial equivalence. The outcome may be:
  - a. Demonstration without further action.
  - b. Demonstration with suggested areas for focused self-improvement. Note this does not limit the individual's ability to register with the College, but merely provides suggestions for continued quality improvement of knowledge or skill to enhance the applicant's overall competence.
  - c. Referral to a panel of the Registration Committee - for those who have demonstrated gaps in knowledge and clinical skills which is below the 80% level of substantial equivalence. The panel will provide specific guidance on recommended actions to meet the requirements. For example, the applicant would receive direction on a program or individual course(s) and the expected level of education required to satisfy the entry-to-practice



requirements to become eligible for registration. Note, the correspondence provided to the SECA applicant at the time of referral includes a summary and detailed report of competence demonstration resulting from the paper and interview review, information on the next steps (i.e. option to retake the interview and/or referral to committee), and information on the applicants route to appeal. Note, if the applicant does not do a retake the file goes directly to committee. The intention is to provide the applicant with every opportunity to successfully enter the college.

Before Step 4, if there are concerns about the individual's performance in the interview, due to reasons such as technology challenges or borderline performance<sup>1</sup>, the Registrar will direct that the applicant undertake a second full interview at the cost of the College. The results of the applicant's first interview may be set aside. This re-review process is like that utilized in the College's Individual Assessment process, used for individuals who have demonstrated eligibility to register for Full Class. The re-review is intended to mitigate reviewer bias by allowing that an applicant with borderline results in the interview process to undergo re-interview by a second reviewer. If the second interviewer agrees with the findings of the first interviewer, the results are clear and are provided to the applicant. If the second interview does not find the same or similar results, the applicant may meet with the Registrar who would conduct a tie breaker review. The results are then provided to the applicant. It is important to note that in this type of situation there are no additional costs to the applicant; this will not change with the introduction of the re-take fee.

The College's goal is to provide individuals with fair opportunity to demonstrate substantial equivalence or to gain a clear understanding of areas in which he/she has failed to demonstrate equivalence so that the applicant can go on to be successful at the application process. CHO believes that the process is comprehensive, detailed, yet fair, objective, and impartial. Further the College feels confident that its mandate of public protection in registering safe and qualified individuals is fairly achieved.

- ii) Describe the impact of the improvements/changes on applicants:

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<sup>1</sup> Borderline performance appears in an applicant's results when the applicant demonstrates some understanding but has not fully demonstrated a number of the required competencies or has a higher level of "borderline" marks where "meets" marks are required.



While the fees have increased and there is potential that this increase will negatively impact some applicants, the College believes the increase and level of fee is reasonable, especially compared to other regulators. The College is open to making accommodation, as necessary to address any unforeseen barriers. The College is open to providing additional consideration by waiving fees and allowing for installment payments where such accommodations are requested in writing. The College does provide accommodations for retakes at no cost to the applicant in the situation of technology issues and borderline results, which the College will undertake a second interview to ensure consistent results. Finally, the College provides applicants with substantial support through the SECA Preparation Guide which, if used, would help the applicant succeed in the interview.

- iii) Describe the impact of the improvements/changes on your organization: The original fee of \$150 per application did not cover the costs of the review process. The increase to \$450 covers the cost of a successful application, and a small portion of the fee offsets the cost of those small number of applications which require re-review for boarder performance and/or are referred to committee.

The retake fee is also set for cost recovery.



#### e. Timelines

- i) Describe any improvements/changes implemented in the last year  
At the beginning of the pandemic and lock down protocols, as staff were adjusting to the office closure, the College did experience a slight delay in the issuance and mailing of official paper certificates of registration to new registrants. This delay was approximately 6 weeks longer than usual; however, CHO staff did ensure to communicate to all new registrants in writing that this delay would not impact their right to practice while they awaited their paper certificates, and their up-to-date registration status was always available through the CHO Public Register for any interested patient or member of the public.

Aside from the delay in sending certificates, the CHO Registration Department did not experience any substantial impact due to COVID-19 related issues, and the CHO returned to its pre-COVID-19 registration processing level by June 2020. All registration systems are online and can be done remotely. CHO will be operating completely remotely until at least fall 2021.

In 2019, the College began its transition to the Microsoft Office 365 for Business cloud-based environment. This transition has enabled the College to remotely manage its telephone and file system through a Canada-based, secure server. The College's phone system allows calls to come directly to staff via their individual computers (as does voice mail) so no communication is missed. Mail will continue to be scanned and uploaded to registration staff. There are no foreseen delays in registration processes. All measures mentioned above have improved the College's ability to process applications quickly and in an efficient manner.

- ii) Describe the impact of the improvements/changes on applicants  
The impacts of the delayed certificates were minimal, as CHO staff communicated with new registrants to inform them that they would be permitted to practice in the brief absence of their paper certificates, and that they could refer patients and any other interested parties to the CHO Public Register to confirm their registration status at any time.
- iii) Describe the impact of the improvements/changes on your organization



College staff were able to resolve the backlog of the paper certificates of registration and were able to quickly eliminate all delays.

Allowing for electronic submissions has allowed CHO to collect necessary supporting documentation from both applicants and education institutions as quickly and easily as before the pandemic, therefore creating a more efficient review process start to finish for CHO staff.



- f. Policies, procedures and/or processes, including by-laws**
- i) Describe any improvements/changes implemented in the last year  
During the 2020 calendar year the College addressed three policy and/or bylaw changes including:
1. Changes to Bylaw 19.03 – Fee Amounts related to fees for the Substantially Equivalence Competency Assessment
  2. Revisions to registration policy REG CS 08 Substantially Equivalent
  3. Creation of registration policy REG AD 016 Reinstatement

### **1. Changes to Fee Bylaw related to SECA Assessment Fees**

The CHO implemented amendments to bylaw 19.03 - Fee Amounts. The proposed fee increase is based on cost recovery of the SECA assessment, and the changes to Section B - Fees Relating to Applications for Initial Registration are as follows:

- To increase the fees under part 6 for Substantially Equivalent Assessment Fee from \$150.00 to \$450.00; and effective November 1, 2020
- To add part 7 for Substantially Equivalent Assessment Retake Fee, a fee in the amount of \$225.00 effective November 1, 2020.

HST is applied to all fees.

Also see further information about the rationale for the fee change under item d.

### **2. Revisions to registration policy REG CS 008 Substantially Equivalent**

Revision to policy REG CS 08 Substantially Equivalent were made to align the policy with the processes which have been introduced and finetuned starting summer 2019. The Registration Committee approved amendments document applicant's rights to retake the assessment, processes related to Registration Committee panel review, reassessment, and appeal.

The policy revisions document the following:

#### **Retakes**

The College will provide the candidate with a 30-day period after he/she receives the results of the SECA review to request a retake of the interview.



Each SECA candidate is allowed up to three (3) attempts at the SECA interview, before exhausting their opportunity to improve their results. If, after the 30-day period no request is received from the candidate or he/she waives the right to a retake, the file will be referred to a panel of the Registration Committee, unless the candidate expresses in writing that they no longer wish to proceed and would like to withdraw from the SECA process.

### **Panel Review**

A panel of the Registration Committee will provide the candidate with clear direction through written correspondence to provide:

1. a summary of the results of the assessment (this is also provided to the applicant at the time he/she is notified of his/her SECA results);
2. specific details on the type and level of additional education and/or clinical training required to address any deficiencies or gaps identified in the assessment; and
3. a general list of acceptable sources/providers to fulfil the successful demonstration of deficiencies or gaps identified in the assessment.

### **Reassessment**

If the candidate has successfully remedied all deficiencies identified by the Registrar or a panel of the Registration Committee, and the candidate delivers acceptable proof of demonstration to the Registrar, the Registrar may:

1. find the candidate eligible to proceed with their application for Full Class registration; or
2. require the candidate to undertake another SECA assessment. Prior to proceeding with an attempt to retake the review, the candidate shall pay the retake fee, and any applicable taxes, identified under Section 19 of the CHO Bylaws. The candidate is allowed up to three (3) attempts at the SECA interview, before exhausting their opportunity to improve their results.

### **Appeals**

If the candidate is not satisfied with the outcome of the decision of the Registration Committee panel, he/she may:

1. request an internal review by a second panel; or





2. submit an application to Full Class and invoke their right to appeal under the Health Professions Review and Appeals Board (as laid out under the *Health Professions Procedural Code*.)

The appeals process and timelines is laid out in registration policy REG AD 01 Registration Appeals Process and Timelines.

### **Definition Clarification**

The Substantially Equivalent Competency Assessment (SECA) process is the full review of a candidate's education and clinical training in homeopathy. The SECA process included both a paper review and structured one-on-one interview component. The review process seeks to understand the candidates' knowledge and demonstrated application of a broad sub-sect of theoretical and clinical competencies from the College's *Competency Profile of Entry-to-Practice Competencies for Homeopaths Practicing in Ontario*. The SECA process compares the candidate's education and clinical training and demonstrated knowledge against that required of a graduate from an approved post-secondary program in homeopathy in Ontario.

### **3. Creation of registration policy REG AD 016 Reinstatement**

The College's reinstatement policy provides applicants to Full Class clarification on the required process steps for reapplication for the following reasons:

1. Reinstatement following a member's certificate being resigned.  
The most common type of reinstatement requests comes from former members who wish to re-enter the College by reinstating previously held certificates or inactive registrants who want to reinstate a previously held certificate in Full Class.
2. Reinstatement following a member's certificate being expired.  
In this type of re-instatement, the former member wishes to re-enter the College by demonstrating that they have met all of the requirements of Full Class and that they previously held a certificate in Grandparented Class.
3. Reinstatement from the Inactive Class to Full Class.



This is the process by which current registrants in the College's Inactive Class can return to practice by reinstating their membership in the Full Class.

### **Reinstatement following a member's certificate being resigned or expired**

Former members who wish to re-enter to the College by reinstating previously held certificates must complete the full application process for Full Class. Applicants must meet all the requirements in place at the time of application, include assessment of her/his knowledge, skill, and judgment in clinical and non-clinical practice and must pay the applicable reinstatement fees. Additionally, an applicant for re-instatement must meet the eligibility requirement.

### **Eligibility for reinstatement**

An applicant is ineligible for reinstatement to Full Class if she or he:

- i. was, after ceasing to be a member of the College, found guilty of any criminal offence in any jurisdiction or of any offence involving the use, possession or sale of drugs in any jurisdiction;
- ii. was, after ceasing to be a member of the College, found guilty of any offence related to the practice of homeopathy or any other profession;
- iii. was the subject of an inquiry or investigation by the Registrar that was not completed at the time the applicant ceased being a member of the College;
- iv. was, at the time she or he ceased to be a member of the College, the subject of an outstanding order of a Committee or of a panel of a Committee with the College;
- v. was, at the time she or he ceased to be a member of the College, in breach of an order of a Committee or of a panel of a Committee of the College;
- vi. was, at the time she or he ceased to be a member of the College, in breach of any written agreement with or undertaking provided to the College;
- vii. was, at the time she or he ceased to be a member of the Class, refused registration in homeopathy or any other profession in any jurisdiction;



- viii. was, at the time she or he ceased to be a member of the College, the subject of a finding of professional negligence or malpractice in any jurisdiction in relation to homeopathy or any other profession;
- ix. was ordered to undergo an assessment or reassessment, or to undergo any continuing education or remedial program, under the College's Quality Assurance Program that was not completed before she or he ceased to be a member of the College.

### **Considerations for Reinstatement from Inactive to Full Class:**

#### **More than three years**

Application to move to Full Class may be considered by a panel of the Registration Committee based on a referral by the Registrar. The Registrar may refer the registrant if considerable time has passed since the registrant was last active or the Registrar has doubts about the registrant's current readiness to practice.

Depending on the length of time inactive and as the result of a panel of the Registration Committee review of the registrant's knowledge, skill and judgment to practise the profession in a safe and professional manner, a registrant may be required to participate in and successfully complete skill or knowledge refreshment or Quality Assurance requirements.

#### **Reinstatement Criteria**

Applications for reinstatement will be assessed by the Registration Committee using the following criteria:

- 1. Length of time applicant has been out of active homeopathy practice.**
- 2. Applicant's skill:** The Registration Committee will take into account recent completion of activities that would have allowed the applicant to sustain a certain level of practical skill in both clinical and non-clinical activities. Examples include, but are not limited to, practice in another jurisdiction.
- 3. Applicant's knowledge:** The Registration Committee will consider the completion of continuing education activities that demonstrate that an applicant has maintained a certain level of theoretical knowledge, understanding of homeopathy, and clinical competence. Examples include, but are not limited to, continuing education obtained in Ontario or other



jurisdictions, attendance at homeopathy related seminars, presentations, workshops, refreshment, or additional clinical training.

**4. Any special circumstances** identified by the Registrar.

**Measurement of Readiness**

The Registration Committee will evaluate a reinstatement applicant's knowledge, skill and judgement, to determine whether it is in the public interest for the applicant to resume practice, or whether additional requirements must be met, based on the criteria set out below.

**1. Reinstatement Requirements**

The requirements for reinstatement after a period of three or more years will be individualized for each applicant depending on his/her specific circumstances. Applicants who provide satisfactory evidence of appropriate knowledge, skill and judgment through homeopathy related activities and continuing education will be reinstated.

**2. Competency-based Assessment**

In cases where an applicant cannot satisfactorily demonstrate competency, or if the Registration Committee is uncertain about the applicant's knowledge, skill, and judgment, the Registration Committee may direct the applicant to complete a competency-based assessment or refresher program.

**3. Quality Assurance Program Requirements**

Following the competency-based assessment, the Registration Committee may direct that the applicant complete quality assurance program activities such as:

- Continuing education and professional development activities such as courses and/or webinars
- CHO Jurisprudence Program

In some circumstances, the Registration Committee may reinstate the applicant's certificate of registration if the applicant agrees to meet specified quality assurance requirements within a certain period of time following reinstatement. This may include a period of supervision as appropriate.

The reinstatement policy was substantially based on that of the College of Nurses of Ontario.



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

**1. Changes to Fee Bylaw related to SECA Assessment Fees**

While the fees have increased and there is potential that this increase will negatively impact some applicants, the College believes the increase and level of fee is reasonable, especially compared to other regulators.

The College is open to making accommodations to address any unforeseen barriers. The College is willing to provide additional consideration by waiving fees and allowing for installment payments where such accommodations are requested.

The College does provide accommodations for retakes at no cost to the applicant in the situation of technology challenges and borderline results. Borderline performance appears in an applicant's results when the applicant demonstrates some understanding but has not fully demonstrated a number of the required competencies or has a higher level of "borderline" marks where "meets" marks are required. If, the results summary indicates that the applicant achieves 70 - 78% overall correct responses then the applicant would be considered to have demonstrated borderline performance and would be directed by the Registrar to re-take the interview at the expense of the College. The second interview allows the College to validate the results of the interview and may allow the applicant to make immediate improvements in performance. If an individual scored an overall mark of 79%, the College would give she/he the benefit of the doubt and deem them substantially equivalent.

Finally, the College has provided applicants with substantial support through the SECA Preparation Guide which, if used, would help the applicant succeed in the interview process.

**2. Revisions to registration policy REG CS 08 Substantially Equivalent**

Between 2016 and 2019, the CHO focused its substantially equivalence review primarily on the competency mapping conducted by CHO staff. The competency mapping process includes significant complexity, and there is a high level of reliance on the applicant to gather and provide information to support the breadth and depth of their education and clinical training. Due to the inconsistency in homeopathy education and the limited education options



in Ontario and Canada, the applicant is tasked with gathering adequate information to provide a clear picture of the course objectives, competencies and evaluations which comprised their individual education and training. Some applicants were challenged due to circumstances beyond their control to adequately collect such information, and some applications included limited supporting documentation. As such, despite its best attempts, this process would often leave the College guessing as to whether an applicant's knowledge, skill and judgment was indeed substantially equivalent.

Applicants were frequently required to provide additional information, and the process of seeking and re-reviewing materials added time to the review process and led to frustration for some applicants. Prior to making the interview mandatory for all SECA applicants, the interview approach was used with select applicants who did not clearly demonstrate all competency requirements through the paper-based review. The interview was generally informative to staff, however, lacked the consistency and transparency of the standardized mandatory interview. Prior to use of a mandatory interview, more files were referred to a panel of the Registration Committee which could add weeks or months to the review process.

Today, the College continues to request applicants provide comprehensive information to the best of their ability, however, the SECA interview reduces some burden from applicants to gather and submit suitable evidence to demonstrate equivalence. The College also maintains a bank of academic curriculum materials to inform review of future applicants, who have graduated from the same program.

The change in process from interviewing some applicants who have been identified with gaps in their education or training, to interviewing all SECA applicants has streamlined the process and ensured a fair and transparent approach to determining substantial equivalence. For most applicants it has even accelerated the timeframe for review. The process has been made clear and consistent, and the information provided to SECA applicants in the Interview Preparation Guide create clear expectations of what to expect going into the interview process.



### **The Retake Process**

While CHO has introduced a limit of three attempts to retake the interview process, it does not preclude the SECA applicant from re-applying if he/she has made additional effort to remedy any significant gaps in the applicant's demonstration of the requirements. Since the introduction of the SECA interview process, less than 5% of SECA applicants have failed to demonstrate substantial equivalence.

Together the paper-based and interview components of the SECA application give the College a solid picture of the applicant's ability to demonstrate substantial equivalence. CHO's intention is to provide the applicant with every opportunity to successfully enter the profession. As such, for those who fail to demonstrate substantial equivalence or who demonstrate substantial gaps, the SECA process provides a roadmap for the applicants' future success.

The goal is to provide each applicant with a clear understanding of his/her results. If an applicant fails to demonstrate substantial equivalence the College provides them with a summary and detailed report of competence demonstration resulting from the paper and interview review, information on the next steps (i.e. option to retake the interview and/or referral to committee), and information on the applicants route to appeal. The applicant may take additional steps to study for the next retake or undertake additional knowledge expansion. Additionally, the applicant could appeal the results to a panel of the Registration Committee.

### **3. Creation of registration policy REG AD 016 Reinstatement**

The College's reinstatement policy provides applicants clarification on the required process steps for reapplication for: Reinstatement following a member's certificate being resigned; reinstatement following a member's certificate being expired; and reinstatement from the Inactive Class to Full Class.

- iii) Describe the impact of the improvements/changes on your organization
  - 1. Changes to Fee Bylaw related to SECA Assessment Fees**



The fee increase to the standardized SECA assessment and addition of the new retake fee is cost recovery. Overall, the increase to revenue is not substantial.

Staff are required to administer additional fees for the retake process.

## **2. Revisions to registration policy REG CS 008 Substantially Equivalent**

Registration staff are required to monitor the number of retakes and communicate appropriately with applicants to ensure they are kept informed about the next steps. While information is detailed in the *SECA Handbook* and *Interview Preparation Guide*, registration staff takes additional steps to ensure that applicants are alerted to the next steps in the process and the potential outcomes.

## **3. Creation of registration policy REG AD 016 Reinstatement**

The creation of the new policy has created points of clarification of criteria to be considered by either the Registrar (if reapplication occurs less than three years prior to change in class, resignation or expiry) or the Registration Committee in the review of applicants who are reapplying for registration in the College. The College received its first reinstatement request in 2020.





**g. Resource for applicants**

- i) Describe any improvements/changes implemented in the last year  
NO CHANGES
- ii) Describe the impact of the improvements/changes on applicants  
NO CHANGES
- iii) Describe the impact of the improvements/changes on your organization  
NO CHANGES



## **h. Review or appeal processes**

- i) Describe any improvements/changes implemented in the last year  
No changes were made to the review or appeals processes for applicants to Full Class.

This year the CHO formalized its retake and appeals processes into place in order to ensure that the SECA review was transparent, objective, impartial, and fair from start to finish for all applicants. Please see a brief overview of the SECA process, as well as the specific details regarding the retake process below:

The Substantially Equivalent Competency Assessment (SECA) process is the full review of a candidate's education and clinical training in homeopathy. The SECA process includes both a paper review and a structured one-on-one interview component. The review process seeks to understand the candidates' knowledge and demonstrated application of a broad subset of theoretical and clinical competencies from the College's Competency Profile of Entry-to-Practice Competencies for Homeopaths Practicing in Ontario.

The SECA process compares the candidate's education and clinical training and demonstrated knowledge against that required of a graduate from an approved post-secondary program in homeopathy in Ontario. At the end of the review process the candidate is provide with information on the outcome of the review.

If the candidate demonstrates 80% or greater of each identified education and clinical training registration requirement, he/she may commence the application process for Full Class and must successfully satisfy all other registration requirements to become a member of the College.

If the candidate demonstrates less than 80% of each identified education and clinical training registration requirements, the Registrar may refer the file to a panel of the Registration Committee. Before this occurs, the candidate will be given the opportunity to retake the assessment with a different assessor.

### **Retakes**

The College provides the candidate with a 30-day period after he/she receives the results of the SECA review to request a retake of the interview.



Each SECA candidate is allowed up to three (3) attempts at the SECA interview, before exhausting their opportunity to improve their results.

If, after the 30-day period no request is received from the candidate or he/she waives the right to a retake, the file will be referred to a panel of the Registration Committee, unless the candidate expresses in writing that they no longer wish to proceed and would like to withdraw from the SECA process.

### **Panel Review**

A panel of the Registration Committee will provide the candidate with clear direction through written correspondence to provide:

1. a summary of the results of the assessment (this is also provided to the applicant at the time he/she is notified of his/her SECA results);
2. specific details on the type and level of additional education and/or clinical training required to address any deficiencies or gaps identified in the assessment; and
3. a general list of acceptable sources/providers to fulfil the successful demonstration of deficiencies or gaps identified in the assessment.

### **Reassessment**

If the candidate has successfully remedied all deficiencies identified by the Registrar or a panel of the Registration Committee, and the candidate delivers acceptable proof of demonstration to the Registrar, the Registrar may:

1. find the candidate eligible to proceed with their application for Full Class registration; or
2. require the candidate to undertake another SECA assessment. Prior to proceeding with an attempt to retake the review, the candidate shall pay the retake fee (\$225+HST) as identified under Section 19 of the CHO Bylaws. The candidate is allowed up to three (3) attempts at the SECA interview, before exhausting their opportunity to improve their results.

### **Appeals**

If the candidate is not satisfied with the outcome of the decision of the Registration Committee panel, he/she may:

1. request an internal review by a second panel; or



2. submit an application to Full Class and invoke their right to appeal under the Health Professions Review and Appeals Board (as laid out under the Health Professions Procedural Code.)
- ii) Describe the impact of the improvements/changes on applicants  
Applicants now have a structured path and process to follow if they are unsuccessful in their SECA interview on the first, second, or third attempt. These processes eliminate any possible grey areas or confusion that may arise throughout the course of the process to determine substantial equivalence of an approved program in homeopathy in Ontario.
  - iii) Describe the impact of the improvements/changes on your organization  
Similarly, the new structured retake process gives staff absolute clarity of all process steps from start to end of the SECA review. This process ensures that T.O.I.F. principles are being followed and strives to eliminate any ambiguity that may arise.



**i. Access to applicants' records**

- i) Describe any improvement/changes implemented in the last year  
Within the last year, the CHO scanned all registration files for secure electronic access, and improved ability for all systems to be accessed remotely by staff.
  
- ii) Describe the impact of the improvements/changes on applicants  
With all files now in electronic versions, there is greater ease of access upon request, which makes for faster retrieval and transmission. There is also now no cost to the applicant/registrant, as little administrative work is required to send requested files electronically.
  
- iii) Describe the impact of the improvements/changes on your organization  
The College's ability to access information electronically allows for greater ease and timeliness when processing requests for records and registration files within a secure Canadian-based cloud environment.



**j.** Training and resources for registration staff, Council, and committee members

- i) Describe any improvements/changes implemented in the last year  
NO CHANGES
- ii) Describe the impact of the improvements/changes on applicants  
NO CHANGES
- iii) Describe the impact of the improvements/changes on your organization  
NO CHANGES

**k.** Mutual recognition agreements

- i) Describe any improvements/changes implemented in the last year  
NO CHANGES
- ii) Describe the impact of the improvements/changes on applicants  
NO CHANGES
- iii) Describe the impact of the improvements/changes on your organization  
NO CHANGES

**l.** Describing any improvements/changes implemented in the last year

- i) Describe any improvements/changes implemented in the last year  
NO CHANGES
- ii) Describe the impact of the improvements/changes on applicants  
NO CHANGES
- iii) Describe the impact of the improvements/changes on your organization  
NO CHANGES

**m.** Describe any registration-related improvements/changes to your enabling legislation and/or regulations in the last year  
NO CHANGES



## Quantitative Information

The following quantitative information is collected for the purpose of observing statistical changes and trends related to application, licensure, appeals and staffing year over year.

### a. Languages

Indicate the languages in which application materials and information about the application process are available.

Language	Yes/No
English	yes
French	yes

Other (please specify):

### b. Gender applications

Indicate the number of applicants in each category as applicable

Gender	Number of applicants
Male	2
Female	22
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	150
Female	335
None of the above	

Additional Comments:



For the following sections d, e & f, the OFC recognizes that the term initial education infers that applicants may receive their education in multiple jurisdictions.

For the purpose of these questions, include only the jurisdiction in which an entry-level degree, diploma or other certification required to practice the profession or trade was obtained.

d. Jurisdiction where applicants obtained their initial education

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

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
14	0	0	Pakistan-1 India-9	0	24

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 education in the profession or trade.

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
14	0	0	Pakistan – 1 India - 9	0	24

Additional comments:





f. Jurisdiction where members were initially trained

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

Ontario	Other Canadian Provinces	USA	Other International (list countries and # of applicants)	Unknown	Total
316	17	8	Australia - 1 Bangladesh - 3 France - 1 Germany - 1 Greece - 2 UK - 15 India - 74 Iran - 1 Israel - 1 Sri Lanka - 1 Pakistan - 23 Romania - 1 South Africa - 1 =Total - 125	19	485



g. Application processed

Indicate the number of applications your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
New applications received	14	0	0	Pakistan – 1 India - 9	0	24
Applicant actively pursuing licensing. Those who had some contact with your organization in the reporting year					39	39
Inactive applicants. Those who had no contact with your organization in the reporting year.	36	1	0	15	2	54
Applicants who met all requirements and were authorized to become members <u>but did not</u> become members	0	0	0	0	0	0
Applicants who became <u>fully</u> registered members	14	0	0	Pakistan – 1 India - 9	0	24
Applicants who were authorized to receive an alternative licence <u>but were not</u> issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence*	0	0	0	0	0	0

- An alternative class of licence enables it 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/licence

Provide a description of the classes of certificate/license offered by your organization. You should have at least one class listed.

	Certification	Description
1	Full Class	<p>following are registration requirements for a Full certificate of registration as stated in O. Reg 18/14 Section 6(1):</p> <ol style="list-style-type: none"> <li>1. The applicant must have,                             <ol style="list-style-type: none"> <li>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</li> <li>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.</li> </ol> </li> <li>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.</li> <li>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.</li> <li>4. The applicant must have successfully completed the jurisprudence course set or approved by the Registration Committee.</li> <li>5. The applicant must be certified in health care provider CPR and standard first aid. O. Reg. 18/14, s. 6 (1).</li> </ol> <p>(2) The requirements in paragraphs 1, 2, 3 and 4 of subsection (1) are non-exemptible. O. Reg. 18/14, s. 6 (2).</p> <p>(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).</p> <p>(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,</p>



		<p>(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</p> <p>(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).</p> <p>(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,</p> <p>(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;</p> <p>(b) the applicant has paid any fees owed to the College; and</p> <p>(c) the applicant has provided the College with any information that it has required of the applicant. O. Reg. 18/14, s. 6 (5).</p> <p>*Note: in accordance with section 10(1)2ii. Grandparented Class expired on March 31, 2020. Applications for Grandparented were accepted until April 1, 2016.</p> <p><i>Terms, etc., Grandparented Class</i></p> <p><b>10.</b> (1) Subject to subsection (2), the following are terms, conditions and limitations on every Grandparented certificate of registration:</p> <ol style="list-style-type: none"> <li>1. The member must at all times be actively engaged in pursuing completion of the assessment referred to in clause 6 (5) (a).</li> <li>2. The member’s certificate of registration expires on the earlier of the following:             <ol style="list-style-type: none"> <li>i. The issuance to the member of a Full certificate of registration.</li> <li>ii. <b>The fifth anniversary of the day this paragraph came into force.</b></li> </ol> </li> </ol>
2	Inactive Class	<p>In accordance with O.Reg 18/14, section 12, the following are non-exemptible registration requirements for an Inactive certificate of registration:</p> <ol style="list-style-type: none"> <li>1. The applicant must be a member holding a Full or Grandparented certificate of registration.</li> <li>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.</li> <li>3. The applicant must not be in default of any fee, penalty or other amount owing to the College.</li> <li>4. The applicant must have provided the College with any information that it has required of the applicant. O. Reg. 18/14, s. 12.</li> </ol>



Additional comments:

i. Reviews and appeals processed

State the number of reviews and appeals your organization processed in the reporting year. Enter the data by jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

January 1, 2020 to December 31, 2020	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Applicants that were subject to an internal review or that were referred to a statutory committee of your governing council, such as Registration Committee						0
Applicants who initiated an appeal of a registration decision						0
Appeals heard						0
Registration decisions changed following an appeal						0

Additional comments:



### j. Paid Staff

Provide the number of paid staff employed by your organization in the categories shown, as of December 31, 2020.

You may use decimals if you need to count half units. For example, on full-time employee plus one part-time employee will be equivalent to 1.5 employees.

Category	Number of staff
Total number of staff employed by the regulatory body	4
Number of staff involved in the appeals process	3
Number of staff involved in the registration process	2

Additional comments:

### Submission

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

**Title: Basil Ziv, Registrar & CEO**

**Date: April 30, 2021**