

Fair Registration Practices Report

Homeopaths (2018)

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.

Following a 60-day consultation period in 2017, CHO Council approved an increase in the annual renewal fee from \$850 + HST to \$1,250 + HST. The change in fees took effect February 15, 2018. The initial registration fee for the first 12 months of registration was not impacted by the fee increase and remains at \$850 + HST.

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

The lower fee for initial registration recognizes that there are other costs associated with meeting the initial registration requirements for the College. The lower fee allows new registrants to better manage their costs leading up to and upon entry to the College. CHO also continues to offer prorating of fees for the first and following years and accommodations can be made for payment by installment.

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

Since March of 2016, the College has been entirely funded by registration and application fees. During its formation and prior to March 2016 the College was subsidized by the Ontario Government and during the transitional phase the College managed to complete the majority of requirements in establishing its regulatory infrastructure. Early financial projections were based on achieving particular membership goals, which are being met but more slowly than anticipated. In order to ensure fiscal sustainability and to keep ongoing renewal fees at their initial level of \$850 annually plus HST, the College's operating expenses have been substantially cut; with the overall staff complement having decreased from eight to four since proclamation. The relatively low initial and annual registration fees provided applicants and registrants time to transition into practice in a newly regulated environment, however, could not be sustained by the College on a long-term basis. In 2017 the College drew on reserves to sustain operations.

From a financial perspective, it is vital that the reserve be replenished 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. 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. For these reasons and, in particular, to ensure the stability and continued effectiveness of the College in the service of the public, homeopathy patients and practitioners, the fee structure was changed.

Moving into its fourth year of operation (2018-2019), the College set renewal fees at a level that more accurately reflects the actual costs of running a small regulatory body and help to adequately cover operational costs and to build an appropriate reserve to support the short and long-term requirements. The College's financial outlook has

improved accordingly.

Following the annual renewal fee increase the College noted a slight increase in resignations (from 2% to 4% of the registrant base) and administrative suspensions (plus .2%) due to outstanding fee payment. The rate of resignations and administrative suspensions may or may not have been a direct result of the increase; however, it is possible they were a contributing factor in combination with other personal circumstances. Eight percent of the registrant base took advantage of the installment plan option.

Applications to the College have remained relatively steady (36 in 2017 and 31 in 2018), and at the anticipated level given the graduation rate from the profession and enquiries from outside of the framework of approved post-secondary homeopathy programs in Ontario.

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.

In 2018, CHO re-issued its registration policy *REG AD03 Requesting a Registration Record* to assist applicants and registrants in better understanding their rights to access the contents of their registration application file, and to more clearly detail the process for accessing this information. Further details of the changes to this policy are provided under item i) Access to applicant records of the 2018 OFC Fair Registration Practices Report, Quantitative Information.

There were no other changes to policies, procedures or processes.

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

The changes to registration policy *REG AD03 Requesting a Registration Record* provide applicants and registrants with a better understanding of their rights to access the contents of their registration application file, and provides clearer detail on what records are considered to be part of the application file and what parts of those records they may access (i.e. a full list of material, however, no original documents and no materials which may, in the Registrant's opinion, jeopardize the safety of any person).

Further details of the impact of this policy change are provided under item i) Access to applicant records of the 2018 OFC Fair Registration Practices Report, Quantitative Information.

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

The changes to registration policy *REG AD03 Requesting a Registration Record* provides staff and committee members with clarity of content regarding the right to release application file information, should an applicant or registrant submit a written request.

g) Resources for applicants

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

In 2018, in conjunction with the OFC Cycle 3 Assessment process, the College reviewed all of its registration materials in an attempt to improve transparency and ease of access to information. In essence, the Cycle 3 Assessment process encouraged staff to look at all aspects of the registration process through a variety of different lenses and to ensure that all applicants had a clear picture of the registration requirements, with sufficient information to smoothly manoeuvre through the entire application process.

Previously some of the required information was available, but not in sufficient detail to answer all registrant questions without the need to contact the College directly. This is the case for information related to timelines for processing applications, appeals process, and alternate routes to satisfying registration requirements. The changes enhanced the applicants understanding of requirements and put all information in one document so that it was instantly and easily accessible.

The information available for those who must undertake a Substantially Equivalent Competency Assessment (SECA) to determine eligibility for registration was expanded to include more information in the SECA handbook, reducing the requirement for the applicant to also review the College's Guide to Registration. Information on language fluency, notarization, translation and rights to appeal were expanded in the SECA handbook to save the applicant from searching for this information in multiple sources. Enhancing and reconfiguring information has helped to minimize uncertainty in the process steps. The College has improved the SECA resources by creating a process specific checklist, and enhancing existing checklists, to ensure that applicants have sufficient and detailed instructions of what steps they will need to take, and what materials they will need to gather in order to submit a complete and comprehensive pre-assessment package.

Registration forms, checklists and flowcharts were edited to synchronize the flow of information from one source to the other.

The College increased its level of transparency so that interested parties can now find all registration related documents and forms on the CHO website.

Overall, the College and staff found the insight, questions and suggestions from OFC staff helpful in assisting in improving all registration materials.

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

All of the changes and additions made to College materials have been in attempt to expand applicant understanding of the registration requirements and process, and to increase ease of access to information through greater transparency. The College has lessened the confusion and uncertainty that an applicant may have when taking the first steps in the registration process, along with each subsequent step toward becoming a CHO registrant.

In making more detailed checklists and guides available, the College has also decreased the total processing time of an application, as staff do not have to request missing documentation following the preliminary review of submitted materials. A complete application package can be processed more expediently and with less back and forth with the applicant than an application which is missing key pieces of required documentation.

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

The College recognizes that direct access by an applicant to registration staff can be helpful in providing useful direction and assistance. College staff also welcomes the opportunity to work with applicants to provide clarification and guidance in the application process. While the process of reviewing registration materials was extensive, it has been a valuable exercise in improving access to information, accelerating the application process, and reducing confusion and hesitation on the part of applicants and other interested parties. These changes have

been beneficial to both applicants and the College.

h) Review or appeal processes

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

i) Access to applicant records

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

In 2018, CHO re-issued its registration policy *REG AD03 Requesting a Registration Record* to assist applicants and registrants in better understanding their rights to access the contents of their registration application file, and to more clearly detail the process for accessing this information. Changes to the policy also reinforced CHO's commitment to protecting the privacy and confidentiality of information it receives or creates in the course of fulfilling its regulatory functions and statutory obligations under the *Regulated Health Professions Act, 1991 (RHPA)*, the *Personal Health Information Protection Act, 2004* and the College's Privacy Code. In particular, in accordance with RHPA, the College's Registrar may refuse to give an applicant anything that may, in the Registrant's opinion, jeopardize the safety of any person.

The policy changes clarified what records are considered to be part of the application file and which documents are part of a pre-assessment application for Substantially Equivalent Competency Assessment to determine eligibility for registration.

Further, the policy changes clarify when payment is due in relation to the College's release of documents. The policy now also specifies that an individual is able to challenge the accuracy and completeness of their personal information and request to have it amended if appropriate.

The College has made clear through the policy that all original documents shall remain the property of the College, and are retained as a permanent record. Finally, the College has stated that any applicant's application record which is inactive for a period of five years, will be closed.

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

The changes to registration policy *REG AD03 Requesting a Registration Record* provide applicants and registrants with a better understanding of their rights to access the contents of their registration application file, and provides clearer detail on what records are considered to be part of the application file and which parts of those records they may access (i.e. a full list of material, however, no original documents and no materials which may, in the Registrant's opinion, jeopardize the safety of any person).

Further, applicants and registrants are now clear when payment is due in relation to the College's release of documents, the ability to challenge and amend the accuracy and completeness of personal information, and that all original documents shall remain the property of the College, and are retained as a permanent record. Finally, the

College has stated that any applicant's application record which is inactive for a period of five years, will be closed.

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

The changes to registration policy *REG AD03 Requesting a Registration Record* provides staff and committee members with clarity on the right to release content, what that content might entail and the process to follow should an applicant or registrant submit a written request for access to application records.

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

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

Training plan under development:

In conjunction with the OFC Cycle 3 Assessment process, the College has commenced the development of a comprehensive training plan for CHO staff and council, and committee members, to be implemented in 2019.

As per the OFC guidelines, our training plan will be extensive, and will enhance the College's compliance with Practice 7.1, 7.2, and 7.3.

Staff and committee training on procedural fairness:

During the 2018 year, staff and members of the Registration Committee received training on procedural fairness as it applies to the registration process. The comprehensive session covered the following topics in detail:

- Basic Premise of Registration
- What is Public Protection
- Responsibilities of the Applicant
- What is the Role of the Registration Committee
- Guiding Documents – Legislative/Regulatory Framework
- OFC Principles: Transparency, Objectivity, Impartiality, Fairness
- Levels of review and reflection
- RHPA Appeals Process
- Types of Law in Canada
- Principles of Procedural Fairness
- Landmark Case on Procedural Fairness & the Baker Factor
- Mechanisms for Procedural Protection
- Court Decisions
- Grounds for Review
- Principles of Natural Justice
- The Art of Writing Reasons by Richard Steinecke & the IDEEA Format

ORAC training on cultural sensitivity for Registrar and Registration Officer: Also during the 2018 year, the CHO Registrar and Registration Officer attended a two day workshop on Managing Cultural Differences and Building an Inclusive Regulatory Environment. These workshops were conducted by a subject matter expert and offered through the Ontario Regulators for Access Consortium.

Day one focused on the following major themes:

- Appreciating perceptions and experiences of internationally educated applicants in Canada
- Recognizing diversity in cultural perspectives
- More effective use of language, including verbal and written communication
- Managing situations where there is potential for misunderstanding and conflict
- Responding to and valuing cultural differences within a rules-based environment

Day two focused on:

- Gaining a deeper understanding of cultural norms and how they influence people's behaviour
- Enhancing cross-cultural communication based on a deeper understanding of cultural differences
- Discussions and sharing of best practices regarding how to work effectively with IEPs
- Developing awareness of other diversity issues and legislative requirements

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

All training and education of Staff and Registration Committee members is beneficial to the applicant, as those involved in the review process at any level are better equipped to approach each situation on an individual basis, and from a transparent, objective, impartial and fair (TOIF) position. As a result of an increased focus on training, staff and other involved parties can, as a result, further support and understand the unique situation and needs of each applicant in conjunction with the broader regulatory requirements.

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

The College, through its training initiatives for registration staff and committee members, and through the process of preparing and undertaking the OFC Cycle 3 Assessment process, has during 2018 advanced its skill, knowledge and judgment of administrating transparent, objective, impartial and fair (TOIF) registration interactions, processes and decisions. The College embraces its' obligation to advance its human and material resources to make the application process a better, fair and less stressful experience for applicant. Through the OFC Cycle 3 Assessment process, CHO found it learned a great deal about how it could realign its procedures and perspectives to improve its registration processes. Through the OFC assessment process, CHO has strengthened its commitment to enhance training of registration staff, committee and Council members in 2019 to ensure relevant regular and ongoing training. The College believes that ongoing training on a variety of relevant topics will ensure that those involved in the registration and decision making process remain current with their knowledge, skill and judgment and also ensures that principles of TOIF are consistently and appropriately applied.

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

I) 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	5

Female 26
 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 172
 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
24	1	1	India 4 Pakistan 1 Total 5	0	31

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
25	1	1	Pakistan 3 India 1 Total 4	0	31

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
315	16	9	India 98	32	538
			Pakistan 34		
			U.K. 19		
			Bangladesh 3		
			Greece 2		
			Iran 1		
			France 1		
			Ukraine 1		
			Germany 1		
			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	24	1	1	5	0	31
Applicants actively pursuing licensing (applicants who had some contact with your organization in the reporting year)	0	0	0	0	72	72

from January 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
Inactive applicants (applicants who had no contact with your organization in the reporting year)	35	1	1	15	1	53
Applicants who met all requirements and were authorized to become members but did not become members	0	0	0	0	0	0
Applicants who became FULLY registered members	25	1	1	4	0	31
Applicants who were authorized to receive an alternative class of licence ³ but were not issued a licence	0	0	0	0	0	0
Applicants who were issued an alternative class of licence ³	0	0	0	0	0	0

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
a)	Full Class	<p style="text-align: center;">Description (a)</p> <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 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).

b)

Grandparented Class

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

c)

Inactive Class

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.

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 1 st to December 31 st of the reporting year	Ontario	Other Canadian Provinces	USA	Other International	Unknown	Total
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	1	1	0	1	0	3
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

Staff involved in registration process 2

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:

2019/03/01

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