College of HOMEOPATHS of Ontario

2023 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)

FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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1. Background

Under section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA), which is substantially similar to section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA).

> "A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations".

Section 22.9 of Schedule 2 of the RHPA and Section 23 of FARPACTA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its annual Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2024.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

2. Organization information

Organization name	College of HOMEOPATHS of Ontario

For questions about this report, please contact:

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3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of HOMEOPATHS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Homeopath
Academic requirement	The CHO Council has approved two Ontario post-secondary programs in homeopathy. Both programs received approval for their theory and clinical components: Canadian College of Homeopathic Medicine and Ontario College of Homeopathic Medicine. As part of the registration requirements, a graduate of an academic Program in Homeopathy needs to demonstrate that he/she has the knowledge, skill and judgment to safely and effectively practice homeopathy. The knowledge,

	skill and judgment required for entry-to-practice into the homeopathy profession in Ontario is outlined in the Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario (February, 2012) and O. Reg. 18/14 requirements for clinical practice experience. A Program in Homeopathy may be approved for the theory component, the clinical component or both. Approved programs include: • 750 hours of theoretical instruction • 225 hours of clinical experience in homeopathy consisting of a minimum of 45 weeks in length and 225 hours of direct client contact that is structured, comprehensive, supervised and evaluated, and • Demonstration that the entry-to-practice competencies have been taught and evaluated by qualified instructors and supervisors. An applicant who did not graduate from an approved program in homeopathy in Ontario shall submit documentation outlining his/her education and training for review through the Substantially Equivalent Competence Assessment (SECA) process to determine if the education and training received is substantially equivalent to that of a graduate from an approved program in homeopathy in Ontario.
Experience requirement	For eligible applicants completing a Full Class Application Form who graduated more than 12 months ago, in order to prove currency in the profession, the applicant must demonstrate 750 hours

	of homeopathy practice over a three-year (36-month) period immediately before the date of the application. For recent graduates, the hour requirement maybe prorated in the first three years post-graduation. For all eligible applicants who are required to demonstrate 750 practice hours, a minimum of 500 of the 750 hours must consist of direct patient contact. Clinical experience hours are based on patient visits. For the purposes of meeting the registration requirements, each intake visit counts as two hours and each follow-up visit counts as one hour, regardless of the time the applicant actually spent in each patient visit. This is in order to ensure that all applicants are calculating hours the same way. Clinical practice hours may be paid or unpaid. All hours must be verifiable in order to be included on the application form. When demonstrating practice hours, a maximum of 250 of the 750 hours can consist of non-clinical experience. The Registration Regulation indicates specific categories of non-clinical experience that can be counted towards practice hours. They are: • Formal professional development • Academic research • Employment teaching hours • Employment related direct supervision • Employment related administration
Language requirement	In order to be registered, each applicant must declare reasonable fluency in French or English or provide proof of reasonable fluency in English

	or French achieved through a language assessment. This requirement is necessary to ensure that Registrants have the ability to communicate with their patients and other health-care professionals in Ontario. Applicants whose first language is English or French or who currently speak, read and write English or French as a primary language will be considered to have met this requirement and can declare this on their application form. Applicants who have obtained post-secondary education taught in English or French will be considered to have met this requirement and can declare this on their application form. An individual who has successfully completed a language test approved by the Government of Canada which is equivalent to a minimum level of 7 on the Canadian Language Benchmark (CLB) assessment scale and was completed within two years of making application to Canada will be considered to have met this requirement and can declare this on their application form. (For information on the equivalence scales visit Language test equivalency charts - Canada.ca) Those for whom the categories above do not apply must submit proof of reasonable fluency achieved through a language assessment that meets the Centre for Canadian Language Benchmarks test using the Occupational Language Assessment (OLA) for Homeopaths to a

	minimum level of 7 in each assessment area.
Additional information on licensing requirements (may include links to appropriate page on regulator website):	Applicants must also submit their supporting documentation package containing the following additional requirements: -Individual Assessment Congratulatory Letter from HRSG -Jurisprudence Program Certificate of Completion -Criminal Background Check -CPR and Standard First Aid Certifications

4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
Human Resource Systems Group (HRSG)	Competency-based assessment
Dual Code	Jurisprudence exam

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of HOMEOPATHS of Ontario takes the following measure(s) to ensure fair and timely assessments:

CHO has worked with HRSG since 2013 and have been partners in developing the individual assessment (IA) process. Fair practices considerations have been built into the assessment process which was reviewed in 2014 by the OFC. -HRSG contacts CHO when each application form and payment is received and seek

approval to proceed (i.e. verifies applicant eligibility). -When HRSG completes and approves the assessment – it immediately notifies CHO. -The College and HRSG have a procedural policy outlining processes, timelines and expectations for fair and timely completion of assessment. This also applies to assessments requiring multiple reviews by assessors (i.e. confirmation of failure to demonstrate). -CHO has regular and fluid contact with the HRSG. -HRSG also has a contractual service agreement with CHO.

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1	Timely review and approval of Applications for Registration
2	Equity and inclusion for all qualified Registrants
3	Fair practices utilized in review of applicants and individuals undergoing the Substantially Equivalent Competency Assessment (SECA) process

B. Risks and Mitigations

Risk	Mitigation Measure
Very small staff size	This does not have an impact on registration, however, does impact the overall effectiveness of the organization.
Fulfilment of all OFC requirements	Completion is ongoing.

6. Changes to registration practices

During the January 1 to December 31, 2024 reporting period, College of HOMEOPATHS of Ontario has introduced the following changes impacting its

registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
Registration requirements either through regulation, by-law or policy	No	
Timelines for registration, decisions and/or responses	No	
Assessment of qualifications, including competency-based assessments and examinations	No	
Documentation requirements for registration	No	
Changes to internal review or appeal process	No	
New or consolidated class of certificates or licenses	Yes	The mandatory development of the Emergency Class was completed and approved by the Government of Ontario. The College has not yet implemented this class, and there are no direct impacts on applicants at this time.
Registration and/or assessment fees	Yes	For the first time since 2018, the College implemented a small fee increase in accordance with bylaw 19.05, which states that

		all fees are to increase by the same percentage as the Consumer Price Index each year. The College did everything possible to avoid raising fees and as a result registrants have not had to face an increase for five years, despite inflation. A significant factor in this year's decision was the need to offset the cost of investigating and adjudicating, including several major complaints which were sent to the Discipline Committee. The complaints, investigations, and adjudication process is an important part of the College's public protection mandate. The CPI increased by 6.8%, so all fees were adjusted accordingly. This raised the fee for full class registration by $85 for the year, or about $7 per month.
Access by applicants to their records	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Resources or training to support applicants to move through the licensing process	No	
Training and resources for staff who deal with registration issues	No	
Anti-racism and inclusion-based policies and practices	No	

C. System partners

Registration process	Changes Made (Yes / No)	Description
Accreditation of educational programs	No	
Mutual recognition agreements	No	
Steps to increase accountability of third-party service provider(s)	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Other	No	
Emergency registration plans	Yes	The Emergency Class registration amendments came into force on August 31st, 2023. The review of qualifications for the applicants in this class is based on the College's existing Substantially Equivalent Competency Assessment review process. Since the process is currently in existence, it speeds up implementation, should the College be required to open the Emergency Class. The Bylaws for fees for this class have been approved and are in place.
Technological or digital improvements	No	

Steps to address labour shortages in the profession or trade	No	

7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator's membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? **(Yes or No)**
Members	No
Applicants	No

Additional description:

B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? **(Yes or No)**
Members	No
Applicants	No

Additional description:

C. Languages of service provision

College of HOMEOPATHS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Homeopath	424

Class of License	Total Number of Members	Number of Internationally Educated Members
Full / General/ Independent Practice	424	153

Gender	Number of Members
Male Female	130 294

Jurisdiction of Initial Training	Number of Members
Ontario	245
Other provinces and territories	13
United States	7
Other International	153
Other/not collected	6

Country of Initial Training	Number of Members
India	100
Pakistan	29
United Kingdom	12
Bangladesh	2
South Africa	2
Greece	1
Australia	1
Germany	1
France	1
Iran	1
Sri Lanka	1
Romania	1
Russia	1
Canada	258
United States of America	7
Other Countries	6

Official language of preference	Number of Members
English	424

Racial identity (optional)	Number of Members

Not collected	424

E. Data Notes

F. Applicant Profile

Profession Name	Total Number of Applicants
Homeopath	**22**

Gender	Number of Applicants
Male Female	2 20

Jurisdiction of Initial Training	Applications received in 2024	Applications with decisions pending (in progress at end of reporting year)
Ontario Other International	12 10	5 1

Country of Initial Training	Number of Applicants
India Pakistan	9 1

Canada	12

Official language of preference	Number of Applicants
English	22

Racial identity (optional)	Number of Applicants
Not collected	22

G. Data Notes

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2024. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	10	0	0
Other International	13	0	0

I. New Registrants

For the 2024 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants	Number of internationally educated registrants
Full / General/ Independent Practice	23	13

J. Data Notes

K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants

L. Data Notes

No Appeals in 2023.

Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement**: The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement**: The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.