

# 2017 Registration Review Report

## Manitoba Naturopathic Association



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## Executive Summary

The 2017 Registration Review Report for the Manitoba Naturopathic Association (MNA) examines their state of progress with regard to the fair consideration of individuals educated outside of Canada. The Fairness Commissioner identifies progress opportunities and MNA responds with an action plan.

MNA's licensure process for internationally educated naturopaths (IENs) trained in approved programs in the United States is straightforward, timely and cost-effective. From 2011 to 2016, MNA had a few internationally educated applicants and all trained in the United States. Applicants trained outside of North America must seek advanced standing from one of two recognized programs in Canada. It is not very clear how this advance standing process works or whether many naturopaths would qualify given that internationally, few jurisdictions provide the extensive, doctorate level training needed in Manitoba.

Subsequent to their participation in the Office of the Manitoba Fairness Commissioner's (OMFC) 2012 self-assessment workshop, MNA

- updated the application page on its website
- discussed Manitoba's fairness legislation with its national bodies
- provided input to the Canadian Association of Naturopathic Doctors about the need for an alternative assessment

In the current review, the Fairness Commissioner identifies a need for MNA to further improve registration information. This includes complete information about documentation requirements and better information about assessment and academic upgrading opportunities for those trained outside of approved North American programs. The Fairness Commissioner also sees value in continued work with the OMFC to improve data collection.

In response, MNA commits with plans:

- to research assessment and gap training opportunities for naturopaths trained outside of the recognized academic programs in North America
- improve registration information available in its website, including registration requirements, model of naturopathic practice, and alternative career opportunities
- continue to work with OMFC on data collection

The Fairness Commissioner sees MNA's Action Plan as a positive response to the progress opportunities.

## Introduction

The Fairness Commissioner conducts registration reviews following her mandate under *The Fair Registration Practices in Regulated Professions Act* (Act) to review the assessment and registration practice of regulatory bodies subject to the Act.

The purpose of a registration review is to enable the Fairness Commissioner to determine a regulator's compliance to the Act and to make recommendations for improvement. Compliance to the legislation refers both to the fairness of assessment and registration practice, with particular attention to the fair consideration of internationally educated applicants, as well as the co-operation of the regulator with the Fairness Commissioner.

The Act stipulates that registration reviews are to be undertaken at times specified by the Fairness Commissioner. It also stipulates that the content of a registration review is to include an analysis of the relevance and necessity of registration requirements, the timeliness of decision-making, the reasonableness of fees and the registration of internationally educated individuals. This may involve the review of any third parties employed in the assessment and registration process.

This 2017 registration review focuses on a few critical issues the Fairness Commissioner has identified as key for Manitoba regulators to make progress; the need for timely registration, the recognition of professional work experience and supervised practice opportunities.

This report evaluates the Manitoba Naturopathic Association's (MNA) assessment and registration practice in terms of its overall state of fair practice and for purpose of identifying progress opportunities. This includes an analysis of MNA's activities to improve practice to date and practices regarding the critical areas of timely registration, the recognition of professional work experience and supervised practice opportunities.

This report is a public document and will be posted on the OMFC's website and submitted to the Minister of Education and Training and the Minister of Health, Seniors and Active Living.

## Context of the Profession in Manitoba

Naturopathic medicine is a distinct primary health care profession built on a patient-centered approach that emphasizes prevention, treatment, and optimal health. Naturopathic doctors provide medical care to patients using natural methods and substances to enhance healing. Their approach emphasizes support and stimulation of the body's own healing mechanisms. Naturopathic doctors – also known as NDs or naturopaths – provide health care to people of all ages and work in private clinics, integrative medical clinics and hospitals.

All licensed naturopathic doctors complete a minimum of three years university-level science training, including pre-medical courses, then four years at an accredited naturopathic medical college. In naturopathic programs, naturopathic doctors study the same basic medical and clinical sciences as other health care professionals. Costs for naturopathic academic training are high, with tuition fees exceeding \$100,000.

Five provinces in Canada regulate naturopathy: British Columbia, Alberta, Saskatchewan, Manitoba and Ontario. There are over 3,000 naturopathic doctors currently practicing in Canada. As of December 2016, the Manitoba Naturopathic Association has 30 registered members.

Although naturopathy is practiced in many regions of the world, few jurisdictions require the doctorate level of training needed by the profession in Canada and the United States.

The Manitoba Naturopathic Association (MNA) had three internationally educated naturopaths license between 2011 and 2016, with an average time to registration of 31 days. These naturopaths trained in the United States.

Provincial immigration statistics indicate that eight individuals identified under the National Occupational Classification (NOC) 3125 immigrated to Manitoba from 2011 to 2016. This NOC code includes internationally educated naturopaths and a variety of other professional occupations in health diagnosing and treating. This group also includes doctors of podiatric medicine, chiropractors and podiatrists, orthoptists and doctors of osteopathic medicine.

## Overview of Assessment and Registration Process

The Manitoba Naturopathic Association (MNA) regulates the practice of naturopathy in Manitoba under the authority of *The Naturopathic Act* (C.C.S.M. c. N80) and 'Manitoba Naturopathic Association Regulations'.

Only persons licensed with the MNA as a registered naturopath may practise naturopathy, or use the title "Naturopath" or any other designation that implies the practice of naturopathy.

### Qualifications

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Principal qualifications needed for registration include possessing a four-year undergraduate Bachelor of Science degree and a doctorate degree from a school of naturopathic medicine approved by the Council on Naturopathic Medical Education (CNME). Individuals must also successfully complete the Naturopathic Physicians Licensing Examinations (NPLEX) and Manitoba board examinations.

Applicants who have not graduated from one of the CNME's nine approved naturopathic medicine programs are directed to seek advanced standing and possibly bridge training and graduation from one of these schools. There are two academic programs in Canada; one located in British Columbia, the Boucher Institute of Naturopathic Medicine; the other in Ontario, the Canadian College of Naturopathic Medicine.

### Assessment and Registration Process

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The MNA's assessment and registration process has a few key steps:

#### 1) Naturopathic Physicians Licensing Examinations

Graduates of CNME approved programs of naturopathic medicine start the process by applying to the North American Board of Naturopathic Examiners (NABNE) to write the NPLEX Licensing Examinations.

Applicants supply documentation attesting to academic standing and identification to the NABNE.

NPLEX exams have two parts and a choice of elective. The NPLEX Part I Biomedical Science Examination tests foundational knowledge of anatomy, physiology, biochemistry and genetics as well as disease and dysfunction. The NPLEX Part II Core Clinical Science Examination tests knowledge of diagnosis, medication, other treatment modalities and medical interventions. NPLEX offers three elective tests in acupuncture, pharmacology and minor surgery.



NPLEX Examinations are case-based, multiple-choice format.

As of 2017, NPLEX Part I costs \$515 USD for test, application and administrative fee. The fee for NPLEX Part II is \$835 USD and the elective exams are \$100 USD.

In Canada, NPLEX exams are offered twice annually in Toronto or Vancouver.

Exam results are provided about seven weeks after the exam writing. Rescoring and appeal opportunities are available. Applicants can view a pass or fail status online and a written exam report follows.

### **Advanced Standing and Bridging Program**

Applicants with academic training outside of the CNME's nine approved academic programs must begin by acquiring advanced standing from one of these programs. There are two academic programs in Canada; one located in British Columbia the other in Ontario. Applicants with gaps in academic qualification must complete coursework to achieve full standing. Upon full standing, applicants are then eligible for, and must apply to complete, the NPLEX licensing exams.

The Canadian College of Naturopathic Medicine in Ontario offers a bridge delivery of its program for international medical graduates. Intended for medical doctors, this alternative career program costs roughly \$100,000.

### **2) Manitoba Naturopathic Association**

Upon successful completion of NPLEX exams, applicants apply to MNA. This involves completing an application form, paying a \$200 application fee and supplying the following documents:

- official transcripts from an accredited naturopathic educational college sent directly to the Manitoba Naturopathic Association
- Criminal Records Vulnerable Sector Search and Child Abuse Registry sent directly to the Manitoba Naturopathic Association
- NPLEX scores for both basic science and clinical exams. The transcripts must be mailed directly from NABNE to the Manitoba Naturopathic Association
- proof of \$2 million liability malpractice insurance, \$3 million for those working with IV therapy

Applicants must also pass the MNA's Provincial Board Exams. These include:

#### **Oral Practical Exam**

The oral exam involves a hypothetical, mock practice scenario. Applicants must ask the appropriate questions, conduct the appropriate exams/diagnostic tests, etc. to arrive at a diagnosis and treatment plan.

Sittings for the Oral Practical exam occur on a quarterly basis in Winnipeg: on the second Tuesday of January, April, July and October.

### Written Jurisprudence Exam

This written exam tests jurisprudence knowledge of the Manitoba Naturopathic Act.

The MNA provides written notification of exam results within a week.

### 3) Registration

Upon meeting the requirements above, the final step in the process is to register with MNA. For first year practitioners the fee is \$1,500.

### Appeal Process

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MNA registration decisions that deny or condition registration are subject to appeal. Following the registrar's decision, the appellant has 30 days to file a written notice of appeal. The board has 90 days from when it receives this notice to hold a hearing. The appellant may appear with counsel. The board has 90 days following the appeal to make a decision and another 30 days to inform the appellant. Unsuccessful appellants have a 30-day opportunity to file a notice of appeal with the Court of Queen's Bench.

### Time and Cost

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The time and cost to register with the MNA vary significantly depending on the circumstances of the applicant. Internationally educated naturopaths trained in CNME approved academic programs face a significantly shorter, less costly route to registration than those needing to seek advance standing and possibly academic coursework.

Upon completing NPLEX exams, MNA 2011-2016 registration data indicates the registration timeline with MNA is short, approximately a month.

### Direct Costs

The Canadian College of Naturopathic Medicine Bridging Program	\$100,000
Exams (NPLEX and provincial board exams)	\$1,650
MNA Application fee and Oral Practical Exam fee	\$200
If applicable, Manipulation Exam fee	\$50
If applicable, Acupuncture Exam fee	\$50
Criminal Record Check	\$30
Malpractice Insurance	\$700
First Year Registration fee	\$1,500

## State of Progress

The Manitoba Naturopathic Association (MNA) is committed to the fair assessment and recognition of internationally educated naturopaths (IENS).

MNA's licensure process is timely and effective for graduates of academic programs recognized by the Council on Naturopathic Medical Education (CNME). Although small in number, all of MNA's applicants from 2011 to 2016, international and domestic, fall in this group, enjoying both short registration timelines and a high licensure rate.

Along with other provincial regulators, MNA has no dedicated assessment strategy in place for internationally educated naturopaths trained outside of the United States, in programs not recognized by CNME.

Manitoba's naturopathy profession is small, thirty members, with limited resources and no education program is in place in Manitoba.

Both MNA and the Canadian Association of Naturopathic Doctors acknowledge the need for a better assessment strategy for IEPs trained outside of CNME recognized academic programs. A proposal for the development of an alternative competency assessment has been discussed nationally, but currently no plans are under consideration.

Given the extensive, doctorate level education required to enter the profession in Canada and the United States, it is not clear if Manitoba would likely see applications from naturopaths outside of North America who would qualify without significant gap training. Academic programs in Australia offer bachelor and Master Degree level training for naturopaths and are closest to the North American model.

### 2013 Registration Review and Recent Progress

MNA underwent an OMFC registration review in 2013, participating in a two-day self-assessment workshop. At this time, MNA identified a need:

- to develop a dedicated landing page on its website for internationally educated applicants
- to inform its national bodies, NABNE and CNME, about Manitoba's fairness legislation
- to continue work with the Canadian Association of Naturopathic Doctors on a new National Competency Model to support an alternative assessment of internationally educated naturopaths
- to avail staff of OMFC training opportunities

Subsequently, MNA took some steps regarding these issues: updating its application page on its website; discussing fairness legislation with NABNE and CNME; providing input to CAND about the need for an alternative assessment; and continuing to participate in OMFC meetings.

## Progress Opportunities and Fairness Concerns

Although MNA has updated its registration information, significant information remains missing. For instance, to learn about MNA's documentation requirements, applicants must contact MNA and request application forms. There is no assessment timeline information and little is said concerning the full standing recognition processes offered by Canada's two recognized academic programs.

We understand that some of these information issues may be mitigated by the personal support and assistance MNA staff provide applicants upon contact. Still, there are circumstances in which access to better information online is helpful.

For applicants trained outside of Canada and the United States, MNA needs a better understanding of assessment and academic upgrading opportunities offered at Canada's two recognized naturopathy programs. Ideally, applicants in this circumstance would have information about the basic qualification requirements of these programs and have a sense of whether they represent a licensure pathway for them.

MNA has worked co-operatively with the OMFC to supply registration data on Manitoba's IEPs. Continued work improving data collection will be helpful to ensure we have a complete, fact-based understanding of timelines and outcomes, including a broader sense of the profession at a national level. This data may also be helpful to support any future considerations to improve the process.

## Progress Opportunities

The Fairness Commissioner sees the following opportunities for progress regarding the Manitoba Naturopathic Association's assessment and registration practice:

1. Improved registration information is needed. This includes complete information about documentation requirements and better information about assessment and academic upgrading opportunities for those trained outside of approved North American programs.
2. Continuing work with the OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for internationally educated applicants in Manitoba.

## Fairness Commissioner's Recommendation

To ensure compliance to *The Fair Registration Practices in Regulated Professions Act*, the Fairness Commissioner recommends that the Manitoba Naturopathic Association take action regarding the above progress opportunity.

## Manitoba Naturopathic Association – Action Plan

In response to the Fairness Commissioner’s recommendation, the Manitoba Naturopathic Association (MNA) proposed the following Action Plan as of November 28, 2017.

Progress Opportunity	Action(s)	Completion Date
1. Improved registration information is needed. This includes complete information about documentation requirements and better information about assessment and academic upgrading opportunities for those trained outside of approved North American programs.	Research assessment opportunities for foreign trained applicants. Confirm with the two naturopathic colleges in Canada if foreign trained naturopaths can enroll in their bridge training programs. If they cannot, do not list this information on the MNA website.	Winter 2017-2018
	Research alternative careers listed on CSMLS and explain the differences in homeopathic and naturopathic practice (education and naturopathic licensing requirements) and outline explicit and clear requirements for licensure with a naturopathic regulatory body in Canada. Provide a link on the MNA website to possible alternative career opportunities.	Winter 2017-2018
	After research is completed prepare a one-page summary of registration requirements for internationally educated individuals trained in natural medicine available on the <a href="http://www.mbnd.ca">www.mbnd.ca website</a> . This document will also provide a path for foreign trained individuals who do not meet the licensing requirements in North America.	Early Summer 2018
2. Continuing work with the OMFC to improve data collection will help ensure a strong, fact-based understanding of timelines and outcomes for internationally educated applicants in Manitoba.	Continue to work with the OMFC on data collection.	Ongoing

### Action Plan Follow-Up

A planned follow-up meeting with MNA and the OMFC will be scheduled in January 2019 to discuss the implementation status of the Action Plan.

## Statement of Compliance

Naturopathy is one of Manitoba's smaller professions and its licensure process works well for individuals trained in Canada and the United States.

A challenge moving forward in this profession lies in resolving what may be possible for naturopaths trained outside of these regions. Currently limited information and guidance is available from the Manitoba Naturopathic Association. My hope is that the Association will avail itself of the resource and assistance my office can provide to improve their registration information.

This activity will support fair practice and align with the intent of *The Fair Registration Practices in Regulated Professions Act* to improve licensure processes for internationally educated applicants in Manitoba.

I look forward to our continued work together.



Ximena Munoz  
Manitoba Fairness Commissioner





## Appendix I: 2017 Registration Review Process

The OMFC's review process has several key steps: meeting to discuss the focus and process of the review, agreeing to a review schedule, documenting, evaluating and preparing a progress report, and achieving an action plan to move things forward. The process is designed to support regulators to further evolve registration practice and realize progressive change.

Activity	Description	Date
<b>Registration Review Workshop</b>	Group meeting between OMFC and regulators Latest data and research presented Fairness Standard, review focus and process presented Review schedule provided	June 10, 2016
<b>Progress Report</b>	Report on MNA fair practice progress Includes analysis of timely registration, recognition of professional work experience and supervised practice opportunities Progress opportunity identified Recommendation from Fairness Commissioner to address the progress opportunity	October 17, 2017
<b>Progress Meeting</b>	MNA and Fairness Commissioner discuss report and possible actions MNA is considering addressing the progress opportunity	November 7, 2017
<b>MNA Action Plan</b>	MNA's Action Plan submitted to OMFC	November 28, 2017
<b>2017 Registration Review Report</b>	Report submitted to MNA Report contains the review findings, MNA's Action Plan, and the Fairness Commissioner's Compliance Statement	December 12, 2017
<b>Registration Review Closeout Meeting</b>	MNA and Fairness Commissioner discuss Registration Review Report, potential OMFC support for actions and how MNA's action plan will inform the relationship moving forward Registration Review Report submitted to Minister of Education and Training, the Minister of Justice and uploaded on OMFC website	December 14, 2017
<b>Action Plan Follow-Up</b>	Meeting between MNA and OMFC to discuss status of action plan implementation	January 2019

### Review participants:

Dr. Mindy Campbell, President, Manitoba Naturopathic Association

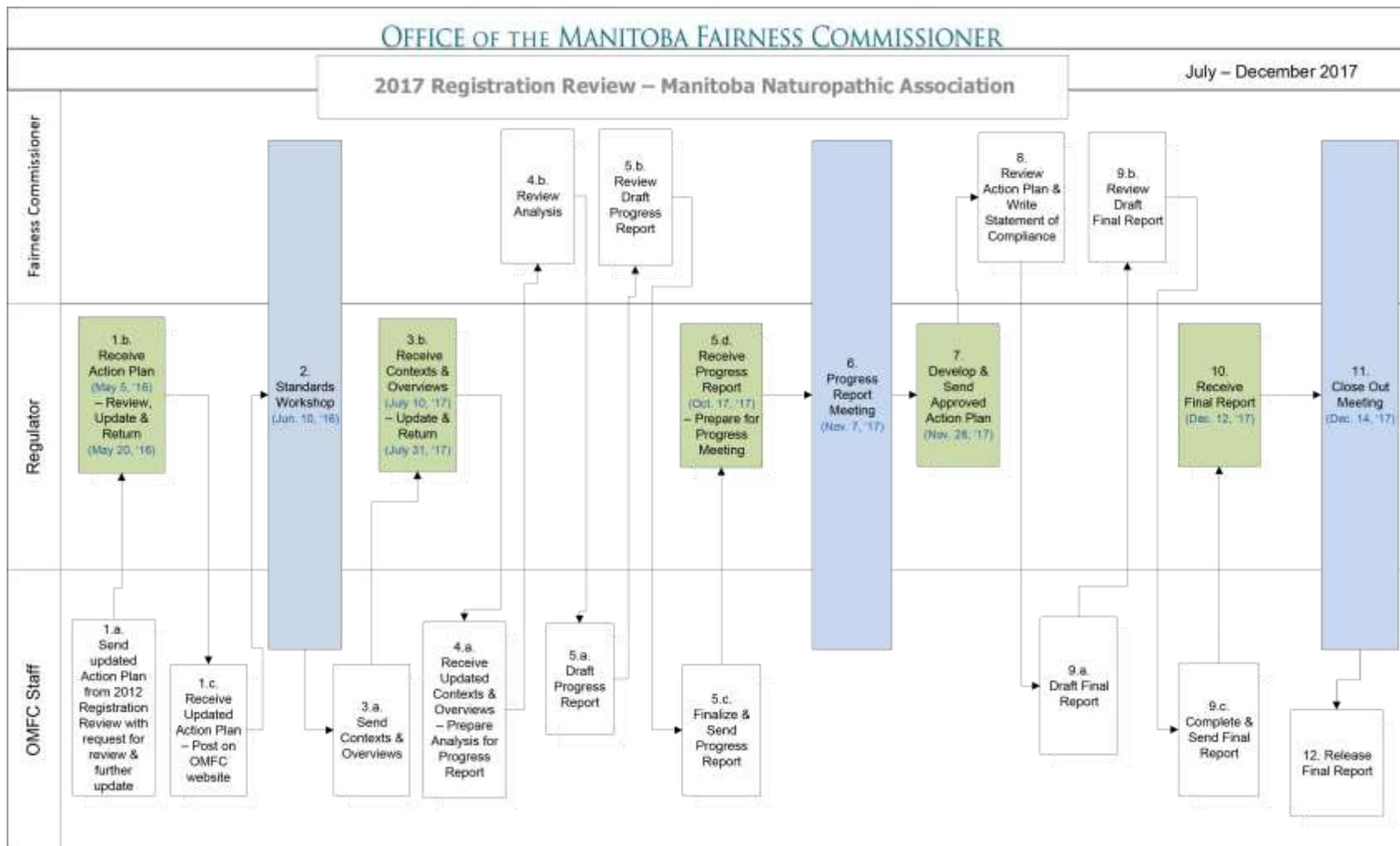
Lesley Phimister, Executive Director and Registrar, Manitoba Naturopathic Association



# OFFICE OF THE MANITOBA FAIRNESS COMMISSIONER

## 2017 Registration Review – Manitoba Naturopathic Association

July – December 2017









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