



College of Homeopaths of Ontario

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STANDARDS AND GUIDELINES

TITLE:	TITLE AND CREDENTIAL
DOC #:	Guideline 4
STATUS:	Approved by Council
CIRCULATION DATE:	March – June 2013
REVISED:	June 2013
APPROVAL DATE:	July 2013

Note to Readers: In the event of any inconsistency between this document and the legislation that affects homeopathic practice, the legislation governs.

College publications contain practice parameters and standards which should be considered by all Ontario homeopaths in the care of their patients and in the practice of the profession. College publications are developed in consultation with the profession and describe current professional expectations. It is important to note that these College publications may be used by the College or other bodies in determining whether appropriate standards of practice and professional responsibilities have been maintained.

POLICY

Registrants, when engaging in homeopathic practise, must use the restricted title associated with the class of registration they hold. Further, the title of “homeopath” is a protected title and is not permitted to be used by those not registered with the College of Homeopaths of Ontario.

INTENT

The intent of this guideline is to provide information to Registrants and the public about use of titles, designations and credentials.

PREAMBLE

The *Regulated Health Professions Act, 1991*, the *Homeopathy Act, 2007*, and Regulations provide Registrants with clear language on protection of title. According to the *Homeopathy Act, 2007*, only Registrants of the College of Homeopaths of Ontario (the College) are permitted to use the titles “Homeopath”, variations and abbreviations thereof by class of registration such as “Homeopath (Transitional)”, “Homeopath (Inactive)”, or equivalent terms in other languages.

The purpose of this legislation is to protect the public by ensuring appropriate and authorized use of these titles. Title protection as part of the regulation of a profession is one mechanism used to help the public readily identify individuals registered with the College. It is a privilege extended to those homeopaths who have met the entry-to-practise requirements and maintain their accountability to a regulatory body.

The use of titles, designations or credentials that are inappropriate, unclear or inconsistent may undermine the purpose of the protected title by making it difficult for the public to determine whether a person is a qualified



Registrant of the profession. It is the restricted title that distinguishes homeopaths from other health care providers and assists patients with understanding who is providing their care.

DESCRIPTION OF GUIDELINE

1. GENERAL

1. Homeopaths who have been issued a certificate of registration by the College are entitled to use the protected titles that indicate their registration with the College. These are:

Class of Registration	Title / Designation	Abbreviation
Full	Homeopath	Hom
Grandparented	Homeopath (Transitional)	Hom (T)
Inactive	Homeopath (Inactive)	Hom (I)

2. The protected title is the Registrant's primary means of indicating his or her professional status in Ontario and must be used in conjunction with their practise of the profession.
3. The College recommends that academic degrees or certificates from recognized universities, colleges and/or private vocational schools be used after and in conjunction with the Registrant's protected title.
4. The order of using protected titles and academic credentials should be consistent with the position of the Registrant. If a Registrant is working as a clinical homeopath, the College recommends that protected titles be used before academic credentials. If the Registrant is working in an educational or other setting, and not actively practicing homeopathy, it may be more appropriate for them to use their academic credentials first.
5. The use of any other title, term or designation that indicates or implies the Registrant is a specialist in any aspect of homeopathy is not permitted. Reference to these courses, or the title conferred by the completion of them, should not be used by the Registrant in their title, business card, or advertisements. The public may misinterpret these other titles as specialized fields of knowledge with established professional practice guidelines and licensing regulations.
6. People who are not registered with the College cannot use the protected titles.



2. HOLDING OUT

1. Section 7(1) of the *Homeopathy Act, 2007* forbids anyone who is not a Registrant of the College from using the titles "Homeopath" a variation, or abbreviation or an equivalent term in another language or Section 7(2) to hold himself or herself out as a person who is qualified to practise in Ontario as a homeopath.

Based on that understanding, it is important to recognize that the use of a title or designation is only a small part of the broader issue of how one represents oneself to others. No one other than a current College Registrant is permitted to use the titles restricted by the *Homeopathy Act, 2007* and/or to hold himself/herself out as a homeopath.

The concept of "holding out" can be determined by use of title (but note that this is not necessary) and by conduct that leaves the audience with the perception that one is qualified and registered to practise as a homeopath. For example, a person proposing "homeopathic treatments" to patients in a "Homeopathy Clinic" or with numerous homeopathic diplomas on the wall (including one that reads "Certified Practitioner of Homeopathy" by an education organization) is likely "holding out" even though the person never uses the word "Homeopath".

3. MISUSE OF TITLE

Title protection is a central tenet to the *Regulated Health Professions Act, 1991* and critical to a regulation model that certifies providers through title registration. The College takes seriously its role to safeguard public interest by ensuring that only competent homeopaths use the title granted at registration. The misuse of title most frequently occurs when an individual who is not a homeopath uses title or practises in a manner which would lead a reasonable member of the public to presume he/she was a registered Homeopath, or when an individual who is practising homeopathy has not registered with the College. All cases brought to the attention of the Registrar are investigated.

Penalties for proven misuse of title bring a maximum penalty of \$25,000 for the first offence and \$50,000 for a second. Ensuring that only current College Registrants' use the restricted title assists the profession with a clear public message of accountability and competency.

4. USE OF TITLE "DOCTOR"

Registrants should be aware that within the *Regulated Health Professions Act, 1991* there is a restriction placed on the title "Doctor" (or variation, abbreviation or equivalent in another language). This title is to be used only by those professions listed in Section 33 of the Act (i.e. chiropractors, optometrists, physicians, psychologists and dentists and, in the future, naturopaths and traditional Chinese medicine practitioners).

NOTE: The restrictions on the use of the title "doctor" apply only in the course of providing or offering to provide health care in Ontario. Registrants with doctoral degrees may use the title "doctor" and its abbreviation (associated with a completed doctoral degree) in non clinical, academic, research and social settings. If the setting involves patient contact in any manner the title "doctor" may not be used. The principles of clear and appropriate representation to the public apply in these situations.



Some Registrants of the College have successfully completed the requirements of university doctoral-degree programs that permit them to use the word “Doctor”, or an abbreviation thereof. For example, some Registrants have obtained a “Doctorate of Homeopathy”, or a HD, a RHom, or a BHMS. These titles, when used to describe academic achievements are not designators of professional competence.

Registrants must never mislead the public as to their qualifications. More specifically, Registrants are prohibited from calling themselves “Dr. Doe”, regardless of their qualifications, when they are providing or are offering to provide health care in Ontario, unless registered with another regulatory health college in Ontario that permits them to use the “doctor” title.

5. REGISTRANTS RESPONSIBILITY:

1. Registrants of the College are responsible for ensuring that, within the context of providing or offering to provide health care, they comply with the guidelines. It is prudent to avoid use of the title “Doctor” in any context, from marketing to administration, to eliminate any chance of being perceived as operating outside of the legislation in this regard.
2. Registrants are responsible for making sure that their staff do not refer to them as “Doctor” in their conversations with individuals or patients.
3. Registrants are responsible for correcting patients who refer to them as “Doctor”.
4. Documents or records signed in a Registrant’s professional capacity must include either his/her full professional title i.e Homeopath; Homeopath, Transitional; Homeopath, Inactive; OR title abbreviation Hom, Hom(T), Hom(I).
5. Registrants should always ensure that they set out their academic qualifications accurately.

6. CREDENTIALS

Use of Other University Degrees (not indicating specialization)

For those Registrants who have obtained his/her homeopathic training following under graduate training, or will have pursued post-graduate degrees outside of homeopathy, such as a PhD or MSc, these conferred degrees, obtained at a University level, can be used by Registrants after their name and following the Hom, Hom(T), or Hom(I) designation.

What remains important is the concept of clear and appropriate representation. The homeopath should consider the audience and determine the most appropriate means of portraying their role to the patient.

For those who have earned a medical doctorate degree outside of Canada, and who are not registered with the College of Physicians and Surgeons of Ontario, the country in which the degree was earned must be stated in brackets following the MD designation. For example, MD (RUS) or MD (PAK).



7. SPECIALTY DESIGNATIONS

Keeping in mind that titles are a part of representation and intended to provide clarity to the audience, specialty designations require careful consideration because they suggest specialization. Detailed in regulation by this College, it is considered professional misconduct to use a term, title or designation indicating or implying specialization in the profession.

Homeopathy as a profession in Ontario does not currently have formal specialty areas. The College provides registration certificates for general practise homeopaths, reflective of the competencies, knowledge, skills and judgment set out in the Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario. Specialty certifications on the other hand carry with them an assumption that they are defined by unique knowledge and skill with specific, defined standards.

It is also commonly held that specialty designations have been secured through an appropriately rigorous credentialing process, something the profession does not currently do. While there are clearly distinct styles of practise such as Classical, Hahnemanian, Sequential, etc., a process to establish specialty certifications does not exist.

The concern for homeopaths is that of determining how to portray expertise within an area of practise without implying specialization within the profession. The public may misinterpret titles such as Classical, Hahnemanian, Sequential, etc., as specialized fields of knowledge with established professional standards, guidelines and licensing regulations. Such designations, courses, or fields of study enrich the basic and mandatory prerequisite education of homeopaths, however they are not currently recognized areas of specialty practise. The College holds the position that it is not appropriate to include credentials, or initials for such, after one's name that would suggest specialization. It is suitable however, to make a statement about an area of special interest or additional training.

For example, rather than stating "Classical Homeopath", it would be appropriate to state "Homeopath with training and expertise in Classical Homeopathy".

Rather than stating "Certified Bowen Therapy" or CBT, it would be appropriate to state "Homeopath with training and expertise in Bowen Therapy".

8. EXAMPLES FOR USE ON TITLE

1. Full Registrant who is an internationally trained medical doctor, without membership in the College of Physicians and Surgeons of Ontario:

Alvin Lepine, Hom, BHMS, MD (NOR),

2. Full Registrant who is a registered with more than one Ontario regulated health profession:

Dr. Douglas Beasley, DC, Hom, BKin
Doctor of Chiropractic, Homeopath



Dr. Michael Flanagan, ND, Hom, MSc
Naturopathic Doctor, Homeopath (NB Naturopaths can only use the title "Dr." after the
Naturopathy Act, 2007 is proclaimed and comes into force.)

Meagan Wrightway, Hom, RMT, BSc
Homeopath, Registered Massage Therapist

3. Inactive Registrant without additional designation:

Bradley Sparks, Hom (I)
Homeopath, Inactive

4. Grandparented Registrant:

Bill Sheppard, Hom (T), DSHM, BKin
Homeopath, Transitional

5. Full Registrant with area of expertise:

Jessica Weatherall, Hom
Homeopath
Training and expertise in Classical Homeopathy

9. **INTERPRETATION**

1. The restriction of the title "Doctor" applies to providing or offering to provide health care to individuals. This restriction does not apply to non-clinical contexts such as social or purely academic settings.
2. "in the course of providing health care" means at any time the scope of practise is being performed, including:
 - Actual treatment.
 - When a patient is in the practise site for whatever reason.
 - When advice is being given to a patient in person, by telephone, electronic or other mode of communication, regardless of the location.
3. "offering to provide health care" includes:
 - Telephone listings and electronic communication or promotion.
 - Websites and social marketing or network sites.
 - Presentations to the public (speeches, lectures, etc.) where one is identified as a practising homeopath
 - Interviews, newspaper articles, media.
 - Referral and consultation letters to other health care professionals.



- Stationery, business cards which will likely be viewed by patients or potential patients.
 - In office communication, signage or print documents.
 - Any form of advertising or promotion.
 - Any instructional or educational material.
4. “to individuals” means patients, potential patients, any other member of the general public, health care professionals in the promotion of practise or in the discussion regarding a patient’s case.

RELEVANT COMPETENCIES & PERFORMANCE INDICATORS

- 1.11 Demonstrate an understanding of the legal and ethical obligations as it relates to the practise of homeopathy, including those imposed by the *Homeopathy Act, 2007* and the *Regulated Health Professions Act, 1991* and Standards of Principles of Professional Ethics.(K)

PERFORMANCE INDICATORS

1. Demonstrate knowledge of the ethical obligations of the noted legislation, standards and related guidelines.
2. Demonstrate knowledge of the legal obligations of the noted legislation, standards and related guidelines (i.e. jurisprudence).

DEFINITIONS

For the purpose of this standard the following definitions apply:

Clinical Practise

The provision of direct or indirect health care or advice to patients including any component of assessment, analysis of findings or provision of treatment to patients and the assignment of any portion of care to support personnel. This includes roles involving assessment, consultation or provision of treatment in schools, industry, occasional weekend or relief work or short term vacation coverage. Even an interaction with one patient per year falls within this definition.¹

Credentials

A general term for a variety of degrees, qualifications or designations, etc. granted by agencies including professional association, academic institutions, and educational bodies.²

Doctor

An education credential associated with PhD. or doctoral programs. The RHPA contains special provisions that govern the use of this education credential in the context of the health care environment.³

Homeopath

“Homeopath” means a registrant of the College of Homeopaths of Ontario.

¹ College of Occupational Therapists of Ontario

² Ibid

³ Ibid



Registrant

A Registrant is a member of the College of Homeopaths of Ontario.

LEGISLATIVE CONTEXT

Regulated Health Professions Act, 1991(RHPA)

Restriction of title “doctor”

33(1) – Except as allowed in the regulations under this Act, no person shall use the title “Doctor”, a variation or abbreviation or equivalent in another language in the course of providing or offering to provide, in Ontario, health care to individuals. 1991, c. 18, s. 33(1).

33(2) – (1) does not apply to a person who is a member of,

- the College of Chiropractors of Ontario,
- the College of Optometrists of Ontario,
- the College of Physicians and Surgeons of Ontario,
- the College of Psychologists of Ontario,
- the College of Dental Surgeons of Ontario.

{Note: On a day to be named by proclamation of the Lieutenant Governor, section 33 is amended by the Statutes of Ontario, 2007, chapter 10, Schedule P, subsection 20(1) by adding the following subsections:

(1.1) Subsection (1) does not apply to a person who is a member of the College of Naturopaths of Ontario, 2007, c. 10, Sched. P, s. 20(1).

Naturopathic doctor

(1.2) A member referred to in subsection (1.1) shall not use the title “doctor” in written format without using the phrase “naturopathic doctor”, immediately following his or her name. 2007, c. 10, Sched. P, s. 20 (1). See; 2007, c. 10, Sched. P, ss. 20 (1). 21 (2).}

And

{Note: On a day to be named by proclamation of the Lieutenant Governor, section 33 is amended by the Statutes of Ontario, 2006, chapter 27, subsection 18 (1) by adding the following subsection

(2.1) Subsection (1) does not apply to a person who is a member of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario and who holds a certificate of registration that entitles the member to use the title “doctor”. 2006, c. 27, s. 18 (1).

Homeopathy Act, 2007

(Note: This regulation is not yet in force. It comes into force on the day named by proclamation of the Lieutenant Governor.)

Restricted titles

7. (1) No person other than a member shall use the title “homeopath”, a variation or abbreviation or an equivalent in another language. 2007, c. 10, Sched. Q, s. 7 (1).



Representations of qualification, etc.

- (2) No person other than a member shall hold himself or herself out as a person who is qualified to practise in Ontario as a homeopath or in a specialty of homeopathy. 2007, c. 10, Sched. Q, s. 7 (2).

Proposed Provisions Related to Title under the *Homeopathy Act, 2007, Ontario Regulation #/ #* Registration:

3. (1)10. The member shall only use the title or professional designation specified for his or her corresponding class of registration in the following table:

Class of Registration	Title / Designation	Abbreviation
Full	Homeopath	Hom
Grandparented	Homeopath (Transitional)	Hom (T)
Inactive	Homeopath (Inactive)	Hom (I)

Homeopathy Act, 2007, Ontario Regulation 315/12 Professional Misconduct (Note: This regulation is not yet in force. It comes into force on the day named by proclamation of the Lieutenant Governor.):

30. Using a term, title or designation in respect of the member's practice that is not authorized by the College.
31. Failing to use the title designated by the College while acting in a professional capacity.
32. Using any term, title or designation indicating or implying specialization in an area or areas of practice of the profession unless the term, title or designation is authorized by the College.
33. Practising the profession or offering to provide homeopathic services using a name other than the member's name as entered in the register.

RELATED DOCUMENTS

- #1 Standard of Practice on Advertising
- #8 Standard of Practice on Dual Registration
- #1 Guideline on Record Keeping and Privacy of Information

SOURCE

- College of Massage Therapists of Ontario
- College of Occupational Therapists of Ontario
- College of Physiotherapists of Ontario