



**Transitional Council of the  
College of Homeopaths of Ontario**

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# Important Memo

To: All Stakeholders  
From: Transitional Council of the College of Homeopaths of Ontario  
Date: December 12, 2011  
Re: Formal Statutory Consultation on Entry-to-Practice Competencies

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**Release Date:** December 12, 2011  
**Consultation Closing Date:** February 15, 2012

## What's included in this package?

1. Introduction Memo (6 pages)
2. Feedback Form (4 pages)
3. Competency Profile to Entry-to-Practice Homeopaths Practising in Ontario (22 pages)

## Mission Statement

The mission of the transitional Council of the College of Homeopaths of Ontario (TC-CHO) is to protect the public interest through self-regulation of the practise of homeopathic medicine by setting high standards for competency and ethical practise. This is achieved through consultation with stakeholders in accordance with the Regulated Health Professions Act, 1991 (RHPA), and the Homeopathy Act, 2007.

## Introduction

One facet of the TC-CHO mandate is the development of professional competencies and practice standards to support the registration, professional misconduct, and quality assurance regulations. The professional competencies are a written statement that describes the integrated knowledge, skills, judgment and attributes required by homeopaths in Ontario. Entry-to-practice competencies are those expect of homeopaths at the beginning of their career.

The TC-CHO invites your comments on the attached *Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario*.

The TC-CHO is pleased to have worked with Assessment Strategies Inc. (ASI), who was hired as an independent third-party, with extensive expertise in the development of professional competencies for regulatory purposes. The competency profile development, which started in September 2011, is the result of hours of collaboration and consultation with subject matter experts and stakeholders across the province. This introduction highlights the

important components of the competency profile, looks at the application of how the competencies will support the implementation of the draft regulations, and address some frequently asked questions.

This document outlines the entry-to-practice competencies for all future registrants with the College. While the profile is specific to the competencies of someone at the beginning of their practice, this document will be used as a base for entry-to-practice assessment, standards development and quality assurance programs, and will, therefore, be applied to all future registrants with the College. Consistent with the College's mandate, the goal is to assure the public that a registered homeopath is competent to practice upon entry to and throughout their professional life.

### Purpose and Use of the Profile<sup>1</sup>

This document is the first Ontario specific competency profile developed for a regulated environment and was created to reflect the diversity of homeopathic practice. The profile describes the integrated knowledge, skills, judgment and attributes required by homeopaths in Ontario at the beginning of their practice. Safe, competent and ethical practice is based on the integration and performance of many competencies simultaneously. The *Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario* will be used to:

- Support regulatory activities that protect the public;
- Develop practice standards, entry-to-practice assessment tools and quality assurance tools;
- Serve as a guide for curriculum development; and
- Increase public and employer awareness of practice expectations at entry-level.

### Understanding the Application of the Competency Profile

The College has an important role in the enforcement of public protection through the maintenance of competent and ethical behaviour among registrants.<sup>2</sup> This function of the College is supported through the proposed registration, quality assurance and professional misconduct regulations. The competency profile provides further support, as well as detail and context to the definition of "What are homeopathic competencies?", "How are they demonstrated?", and "What might be acts of incompetence?"

### Professional Misconduct Regulations

Registrants will be held to a transparent and objective standard based on the competency profile. The TC-CHO is developing standards, guidelines, and policies related to a range of practice matters such as record keeping, ethics, informed consent, etc. These documents will be circulated for consultation during 2012.

The College responds to public and employer complaints about a registrant and will investigate all complaints. Complaints, Inquires, and Report investigations may lead to the assessment of the registrants' performance and abilities to determine if he/she is providing competent care within the scope of practice. If there is a competency deficiency in the registrants' ability, the College may work with him/her to create a plan to bring them to the appropriate level of competency.

### Quality Assurance Regulation

One of the best ways of maintaining competence is to engage in systematic and comprehensive continuing education. The Quality Assurance Program (QAP) assures that the entry-to-practice competencies and basic knowledge, skills and judgment acquired by registrants during their educational training are maintained through registrants engaging in continuous learning activities that relate to their professional practice.

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<sup>1</sup> *Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario*, Draft December 2011, Glossary page 13.

<sup>2</sup> Registrant refers to a homeopath who registers with the College of Homeopaths of Ontario.

In accordance with the Quality Assurance regulation, based on section 80 of the *Regulated Health Professions Act, 1991*, the program shall include the following components:

- Continuing education or professional development designed to promote continuing competence and continuing quality improvement among the registrants, and
- Incorporate standards of practice, advances in technology, changes made to entry to practice competencies and other relevant issues at the discretion of the Council.<sup>3</sup>

Based on the competency profile, the College will issue policies and guidelines outlining the Quality Assurance Program (QAP) to help registrants engage in meaningful and appropriate continuing education. These documents will be circulated for consultation during 2012.

### Registration Regulations

The word “Competencies” is referred to in several places throughout the explanation and rationale of the TC-CHO Draft Registration Regulations, August 2011. The competencies are also specifically referenced in provisions related to the Full and Grandparented classes, as noted below.

#### Full Class (Specific Reference to Competencies Document)

4. (1)1i. This provision outlines the educational requirements of an Ontario educated applicant to the Full class<sup>4</sup>
4. (1)1ii. An individual who does not meet the educational or clinical training requirements under 4.(1)1i (above) will be assessed through the provision 4.(1)1ii. The applicant’s prior learning and practice experience will be assessed to determine if it is substantially equivalent compared to the entry-to-practice competencies document. This provision outlines the educational requirements for the full class applicant who has completed a program outside of Ontario or who has had an unique blend of training and experience.<sup>4</sup>
4. (1)2. Outlines the clinical practise training requirements of the entry-to-practise competencies for an applicant to the Full Class.<sup>4</sup>
4. (1)3. Indicates that an applicant to the Full Class must have successfully completed the assessment based on the entry-to-practice competencies.<sup>5</sup>

Homeopaths wishing to register in the Full Class must have met the entry-to-practice competencies at the time of application.

#### Grandparented Class (Specific Reference to Competencies Document)

Homeopaths wishing to be registered with the College of Homeopaths of Ontario through the Grandparented Class must apply by the one-year anniversary of proclamation. Grandparented Class registrants must have successfully demonstrated the key and safety competency components at the time of application. In addition, these registrants must actively pursue the prior learning assessment process and demonstrate successful completion of all competencies to be eligible for the Full Class. As the Grandparented Class will cease to exist on the five-year anniversary of proclamation, it is required that those who wish to maintain registration become eligible for the Full Class as quickly and efficiently as possible because the Grandparented Class is a time-limited Class.

<sup>3</sup> TC-CHO Draft Quality Assurance Regulation, November 2011, provision 2.(1) 1. i and iii., page 1 and 2.

<sup>4</sup> TC-CHO Draft Registration Regulation, December 2011, page 13 at [www.collegeofhomeopaths.on.ca](http://www.collegeofhomeopaths.on.ca).

<sup>5</sup> TC-CHO Draft Registration Regulation, December 2011, page 15 at [www.collegeofhomeopaths.on.ca](http://www.collegeofhomeopaths.on.ca).

The attached competency document is specifically referenced in the following Grandparented Class provisions:

5. (1)1. Which outlines the requirement for successful completion of the safety and key competency components of the prior learning assessment.<sup>6</sup>
5. 3 Outlines requirements for the Grandparented applicant to move to the Full Class including “having successfully completed a prior learning assessment approved by the Registration Committee demonstrating that he or she has obtained the entry-to-practise competencies of the profession...”<sup>7</sup>

The *Competency Profile for Entry-to-Practice Homeopaths Practising in Ontario* will therefore be part of the registration regulation. As with any regulation, there must be a formal consultation with stakeholders. The current consultation on this document fulfills this statutory circulation requirement.

### Registrant Assessment

In the new year, TC-CHO will develop the assessment framework and process with the assistance of third-party consultants. The assessment tools will utilize the entry-to-practice competencies and the educational and training requirements set out in the proposed registration regulation. Assessment tools will be developed for students, homeopaths with prior learning and practice experience, jurisprudence, and language assessment.

### Development of the Profile

The *Entry-to-Practice Competency for Entry-to-Practice Homeopaths Practising in Ontario* is a culmination of hundreds of hours of time and effort by over 150 stakeholders. The process used to create, review and validate the competency profile followed a best-practice approach to competency development and strongly relied on the content expertise of a diverse group of homeopaths. The profile was designed to be meaningful to practitioners as well as those who want to learn more about the practice of homeopathy.<sup>8</sup>

The competency profile was developed through the completion of a five-phase project (see Appendix A and B of the attached competency document<sup>9</sup> for complete details). The framework used to develop this competency profile was adapted from the patient-centred framework used by several health-care professions throughout Canada and beyond including nurses and chiropractors. The decision for a patient-centred framework was based on the following criteria: (a) it highlights the patient-centred beliefs at the heart of homeopathic practice and (b) it uses a common language that is shared across health-care professions. It should be noted that all examples provided throughout this document are meant to provide general guidance on the meaning of the concept and are not meant to be an exhaustive list.<sup>10</sup>

There were five key phases including:<sup>11</sup>

- (1) literature review and recommendation of the patient-centered framework to Council;
- (2) five-day competency development workshop with a diverse group of homeopaths from across Ontario;
- (3) review and update from the Ad-Hoc Advisory Group and Transitional Council of the College of Homeopaths of Ontario;
- (4) online validation of the competency profile; and
- (5) finalization and additional review of the profile.

<sup>6</sup> TC-CHO Draft Registration Regulation, December 2011, page 17 at [www.collegeofhomeopaths.on.ca](http://www.collegeofhomeopaths.on.ca).

<sup>7</sup> TC-CHO Draft Registration Regulation, December 2011, page 18 at [www.collegeofhomeopaths.on.ca](http://www.collegeofhomeopaths.on.ca).

<sup>8</sup> *Competency Profile for Entry-to-Practise Homeopaths Practising in Ontario, November 2011, Appendix A, page 17.*

<sup>9</sup> Ibid Appendix A, page 17.

<sup>10</sup> Ibid Development of the Profile, page 2.

<sup>11</sup> Ibid Appendix A, page 17.

As a final step, the competencies are being disseminated to the profession and public for a 60-day statutory consultation period from December 12, 2011 to February 15, 2012. The goal is to solicit additional feedback from stakeholders to ensure that the end product reflects the practice of homeopaths practicing in Ontario.

### A Word on the Validation Survey

Seven hundred and twenty eight email messages were sent out to homeopaths (contained in the TC-CHO database) and other stakeholders across Ontario and beyond. As of the survey deadline, 177 surveys were completed, yielding a response rate of approximately 24.3%. Respondent ratings of the 110 competencies and sub-competencies were aggregated to determine which if any should not be considered relevant to entry-level practice. Qualitative feedback from respondent was also reviewed. You can read more about the statistical results on page 17 Appendix A of the attached document.

The survey asked respondents to evaluate the general competencies according to three criteria:

1. Applicability – i.e., How applicable is this competency to homeopaths at entry-level practise?;
2. Importance – i.e., How important will performing the listed competency be for the safe and effective practise of the entry-level homeopath?, and:
3. Frequency – i.e., How often, on average, will the entry-level homeopath perform the listed competency?

Thank you to those who have completed the online survey. The responses assisted in providing a better understanding of current homeopathic practise across Ontario.

### Sections of the Draft Competency Profile for Entry-to-Practice Homeopaths

- I. Introduction and Background
- II. Context of Practice
- III. Key and Safety Competencies and Assumptions (1 to 11)
- IV. Competencies
  - Professional Responsibility and Ethical Practice (1.1 to 1.10)
  - Knowledge-Based Practice
    - Specialized Body of Knowledge (2.1 to 2.24)
    - Competent Application of Knowledge
      - Initial Intake (2.25 to 2.26)
      - Case-Taking-Consultation (2.27 to 2.31)
      - Case Analysis (2.32 to 2.36)
      - Selection and Dispensing of Homeopathic Medicine (2.37 to 2.41)
      - Case Management (2.42 to 2.46)
  - Practice Management (3.1 to 3.6)
- V. Glossary

### Key and Safety Competencies

The TC-CHO recognizes that there are many levels of competency among existing homeopaths, as well as a variety of practice, training and teaching models/styles. Regardless of the approach or level, practitioners must meet the minimum entry-to-practice competencies to be considered competent.

All registrants, regardless of the class of registration, must meet the essential “key” and “safety” competencies at the time of application. To be eligible for the Full Class registrants are required to meet all of the entry-to-practice competencies at the time of application.

**Key Competencies are marked in this document with a “K”.** Key Competencies are the knowledge, skills, and abilities identified by subject matter experts as those that are most essential to competent practice at entry into the profession. These 38 competencies and sub-competencies are based on their importance to competent practice as well as their frequency of occurrence in practice.

**There are 36 Safety Competencies. These are marked in this document with an “S”.** Safety Competencies are the competencies and sub-competencies identified by subject matter experts as those most important to minimizing the risk of harm to the patient.<sup>12</sup>

Note that there is significant overlap between the Safety Competencies and the Key Competencies. In other words, many competencies and sub-competencies that are deemed “Key Competencies” are also deemed “Safety Competencies”. Together Key Competencies and Safety Competencies comprise approximately 46% of the 105 competencies and sub-competencies in this document.

### How to Provide Your Feedback

The formal consultation allows individuals to provide written comment on the competencies and to express comment and/or concern on any specific competency or section within the document. Consultation makes documents stronger. All comments, reactions and suggestions to the attached document are welcome. Comments with examples of your experience are especially helpful.

1. Please use the attached feedback form. The form is also downloadable from the website at [www.collegeofhomeopaths.on.ca](http://www.collegeofhomeopaths.on.ca).
2. Provide your comments on the enclosed form or attach as a separate document, as required.
  - a. You may wish to provide feedback by section, by competency, general comment or specific comments on key and safety competencies.
  - b. If you are making specific comments please include the page #, section/competency number, and comment and/or suggestions.
  - c. As we appreciate that you may have questions about the competency development process or interpretation of a specific competency please note your questions in the “Questions” section.

### Example

Page Number	Section Name & Competency #	Comment	Suggestion
6	Professional Responsibility and Ethical Practice 1.5	I agree that patient confidentiality and privacy are important at all times of one's practice life not just entry-to-practice.	No change.
6	Professional Responsibility and Ethical Practice 1.7	I find that neither my patients nor my colleagues, other health-care practitioners or community resources want to collaborate with me.	Change to “Attempting, where appropriate, to collaborate with...”.

3. **Submit no later than February 15, 2012 to:**

Email: [info@collegeofhomeopaths.on.ca](mailto:info@collegeofhomeopaths.on.ca)

Fax: 416-864-4077

Mail: Attention – Feedback

Transitional Council of the College of Homeopaths of Ontario  
163 Queen Street East, 4th Floor, Toronto, ON M5A 1S1

*TC-CHO extends its sincere thanks for your valuable contribution to the homeopath profession and for taking the time to provide your feedback. Your participation promotes the continued quality of homeopath care in Ontario. All written comments and feedback will be carefully considered by the transitional Council and its committees.*

<sup>12</sup> Based on HPRAC- New Directions: Regulation of Homeopathy and Naturopathy Ch. 5, p. 163, April 2006.