

Response to: Agency Establishment & Accountability Directive

To: Ontario Minister of Health and Long-Term Care

From: The Board of Directors of Drugless Therapy - Naturopathy

Date Submitted: July 12, 2011

Signed by



For the Board: _____

Patricia J. Rennie, ND

Chair

Signed this 12th day of July, 2011 in the Municipality of Toronto, Ontario

For the Ministry: _____

(Name):

(Title):

Signed this _____ day of _____, 2011 in the Municipality of _____, Ontario



DEFINITIONS

As used in this Business Plan, the following terms have the following meanings:

“Act” means the Drugless Practitioners Act, as amended from time to time, and includes all regulations thereunder;

“Annual Report” means the annual report prepared by the Board in accordance with Management Board’s Agency Establishment and Accountability Directive;

“BDDT-N” means the organization of the Board of Directors of Drugless Therapy – Naturopathy;

“Board” means the five people appointed as members of the Board of Directors by the Lieutenant Governor in Council under subsection 3(1) of the Act;

“Business Plan” means the business plan prepared by the Board in accordance with Management Board’s Agency Establishment and Accountability Directive;

“Chair” means the Chair of the BDDT-N as designated by the Lieutenant Governor in Council under subsection 3(1) of the Act;

“Deputy Minister” means the Deputy Minister of Health and Long-Term Care;

“DPA” means the Drugless Practitioners Act;

“Drugless therapist” means a person who is not authorized to perform the full scope of practice of the naturopathic profession and is registered by the BDDT-N in a separate category from the “Naturopath” Registrants;

“Fiscal Year” means the period of time beginning on January 1st and ending on the following December 31st;

“Government” means the Government of Ontario;

“Lieutenant Governor in Council” means the Lieutenant Governor in Council of Ontario;

“MBC” means Management Board of Cabinet;

“Memorandum” means Memorandum of Understanding;

“Minister” means the Minister of Health and Long-Term Care;

“Ministry” means the Ministry of Health and Long-Term Care;



DEFINITIONS

“Naturopath” means a person who is registered by the BDDT-N to practise the full scope of the profession;

“Party” means the Ministry or the BDDT-N and **“Parties”** means the Ministry and the BDDT-N;

“Profession” means the naturopathic health profession;

“Person” is broadly defined to include an individual, a corporation, a partnership, a trust, a joint venture, an unincorporated association, a federal, provincial or municipal government and the agencies of such governments;

“Regulation” means Regulation 278 (General) made under the Act;

“Registrant” means a person who is registered under the BDDT-N and has met the requirements to practise Naturopathy or who has been registered as a drugless therapist;

“TB/MBC” means Treasury Board and MBC;



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EXECUTIVE SUMMARY

The Board of Directors of Drugless Therapy – Naturopathy (BDDT-N) is responsible for public protection with respect to the practice of Naturopathy and regulates more than 1,100 Registrants of the naturopathic profession in Ontario under the *Drugless Practitioners Act (DPA)*. More particularly, the BDDT-N sets standards for the practice of the profession, examines and registers qualified NDs, investigates complaints about Registrants, conducts disciplinary proceedings, communicates with Registrants to keep them abreast of the latest developments and liaises with government and stakeholders within the Board’s regulatory mandate.

Naturopathy is based on the following six principles:

“First Do No Harm – *Naturopathic Doctors utilize therapies that minimize the risk of harm and apply the least possible force to restore health.*

The Healing Power of Nature – *Naturopathic Doctors recognize and support the inherent self-healing ability of the individual.*

Identify and Treat the Cause – *Naturopathic Doctors seek to identify and treat the underlying cause of disease.*

Doctor as Teacher – *The primary role of the Naturopathic Doctor is to educate and support each patient in taking responsibility for his or her health.*

Treat the Whole Person – *Naturopathic Doctors recognize that health results from a complex interaction of many factors and focus on treatment of the whole person through individualized care.*

Focus on Prevention – *A primary objective of the Naturopathic Doctor is the prevention of disease through encouraging a healthy lifestyle and controlling risk factors.” *¹*

Pursuant to legislation that will move the regulation of NDs from the DPA to the *Regulated Health Professions Act, 1991 (RHPA)* and the *Naturopathy Act, 2007*, a Transitional Council (TC) has been appointed by the Ministry to develop the foundational regulations, bylaws, etc. for regulation of the Profession by the new College of Naturopaths of Ontario. The BDDT-N continues to protect the public by regulating NDs throughout the transition and will also ensure that everything has been put in place to transfer the assets of the BDDT-N to the College once it is operational.

The BDDT-N advocated strongly for the creation of a profession-specific act for NDs under the RHPA in order to provide the public with assurances that their Naturopaths will be held to the same high standards that are in place for all other regulated health professions in Ontario and ensure that patients will continue to have access to the care they have come to expect from their NDs. The Ministry has set a date of March 31, 2013 for proclamation of the *Naturopathy Act*. While the transition process is underway, the BDDT-N continues with its ongoing regulatory activities such as updating and augmenting standards for the practice of the profession.

¹ Taken verbatim from the Board’s Mission and Vision statement.



EXECUTIVE SUMMARY

The BDDT-N also spearheaded the development of a Mutual Recognition Agreement among all Canadian naturopathic regulators that is in compliance with the *Agreement on Internal Trade* and the *Ontario Labour Mobility Act*.

The BDDT-N's revenues are comprised of fees from Registrants and from examination candidates. Approximately 923 NDs registered to practise in the province are included in the "Active" category and pay an annual registration fee of \$900. NDs who choose to register with the Board, but are not registered to practise in Ontario, are included in the "Inactive" category and pay an annual fee of \$250. There are approximately 208 NDs registered as Inactive. The total revenue for 2011 as at June 28, including registration fees, examination fees and interest, was \$994,034.70 Total expenditures for 2011 as at June 28 amounted to \$416,901.48. The projected revenue and expenses for the next three years is:

Year	Revenue (\$)	Expenses (\$)
2011	1,036,470	1,034,481
2012	1,073,946	1,065,348
2013	1,123,700	1,069,848

The BDDT-N has prepared financial statements, a summary of staff numbers, an organizational chart, an environmental scan, a strategic directive, a risk assessment, an implementation plan and a communications plan as part of its Business Plan to fulfill the Agency Establishment & Accountability Directive requirements from the Management Board of Cabinet. The Board, Executive Director, Staff and outside advisors have participated in the preparation of this report to the Minister of Health and Long-Term Care. The BDDT-N looks forward to collaborating with the Ministry in order to successfully implement the plan set out in this report.



MANDATE

The BDDT-N's exclusive mandate is to regulate the naturopathic profession in the public interest as set out in the *Drugless Practitioners Act*, R.S.O. 1990, Chapter D.18 and R.R.O. 1990, Regulation 278. The five members of the Board are appointed by the Lieutenant Governor in Council. When there is a full complement of members, the Board is comprised of four members of the naturopathic profession (referred to as "professional members") and one member of the public (referred to as the "public member").

The DPA prescribes things such as the terms of office for the Board of Directors and the types of regulations that may be made with the approval of the Lieutenant Governor in Council. Regulation 278 sets out the fees charged to Registrants as well as the examination and registration requirements, processes for the investigation of complaints against and discipline of Registrants and the allowances that may be paid to Board members.

The following statements were adopted by the Board to guide the activities and decisions of the BDDT-N and can be found on the Board's website at www.boardofnaturopathicmedicine.on.ca:

Vision – Through their experience of a well-regulated profession, all Ontarians regard Naturopathy as a vital aspect of their healthcare.

Mission – We protect the public by setting high standards for the practice of Naturopathy and by providing access to a fair and transparent regulatory process.

Values – We honour the principles of Naturopathy and value the following: inclusiveness, accountability, transparency, ethical conduct and the evolution of the profession.



ORGANIZATIONAL CHART

Ministry of Health and Long-Term Care

Board of Directors of Drugless Therapy – Naturopathy

Chair
Secretary Treasurer
Professional Members
Public Member

BDDT-N Executive Director

Complaint Resolution Committee

Continuing Education Committee

Examinations Committee

Parenteral Therapy Committee

Policy Committee

Executive
Administrator

Registrant Services
Coordinator

Communications
Coordinator

Administrative
Assistant



ENVIRONMENTAL SCAN - ASSESSMENT OF ISSUES FACING THE AGENCY

The BDDT-N and the naturopathy profession are in transition. The *Naturopathy Act, 2007*, pursuant to which the profession will be regulated under the *Regulated Health Professions Act*, has received Royal Assent and a Transitional Council has been operational since November, 2009. The role of the Transitional Council is to develop the foundational regulations and bylaws necessary to regulate the profession. When that process has been completed, it is anticipated that the *Naturopathy Act, 2007* will be proclaimed and the College of Naturopaths of Ontario will commence operations. The Ministry has set a date of March 31, 2013 for completion of the Transition process. Throughout the entire transitional process, the BDDT-N remains responsible for regulating the Profession under the *Drugless Practitioners Act*.

The uncertainty of the timeline for winding up the BDDT-N complicates recruitment and retention of personnel as well as long-term planning and budgeting.

In regulating the Profession during this period, the BDDT-N tries to replicate the provisions of the RHPA as much as is permissible under the DPA in order to ease the transition for the Profession and to regulate the Profession as effectively as possible in the public interest. Nonetheless, the DPA is antiquated legislation that limits the Board's ability to reflect the RHPA and to protect the public.

One of the challenges that the BDDT-N will continue to deal with is how to ensure that Registrants understand that they continue to be governed by the Board and by the provisions of the *DPA* until the *Naturopathy Act, 2007* is proclaimed. This includes understanding that they may not perform the additional controlled act of prescribing that is authorized by subsection 4.(1)7 of the *Naturopathy Act, 2007*. The Board finds it must also periodically remind politicians, government officials and other stakeholders of the continuing existence and role of the Board in order to maintain its relevance and visibility in the policy-making process.

The separate operation of the Transitional Council and the BDDT-N also generates challenges. Although Board members are automatically members of the Transitional Council, the two organizations operate separately and all members of the Transitional Council are subject to strict confidentiality provisions. As a consequence, it is sometimes proving difficult for the Transitional Council and the Board to coordinate the activities of both organizations and it is thus possible that each organization may take actions that are unnecessarily duplicative, in conflict or inconsistent with the actions of the other organization.

Furthermore, the cost to Registrants of funding two separate operations will be significant. Those costs are both tangible and intangible and include the operating costs of the Board and the eventual repayment of the loan to fund the start-up and operations of the Transitional Council.



ENVIRONMENTAL SCAN - ASSESSMENT OF ISSUES FACING THE AGENCY

The fact that each Board member also has duties with the Transitional Council, and those duties are substantial, risks exhausting the Board members and/or detracting from their ability to focus on Board matters. This is particularly the case if the Board has any vacancies. Even one vacancy on the Board, particularly a vacancy in public member position, severely complicates the Board's administration of any disciplinary procedures and could be perceived as undermining Registrants' right to due process and natural justice. As a consequence, it is critically important that the government's senior appointments process ensure that vacancies on the Board are filled quickly, with minimal interruption in continuity.

The BDDT-N committed substantial time and resources to the process that culminated in the *Naturopathy Act, 2007*, as well as to the recent amendments thereto that constituted part of Bill 179. Now that the process has been completed and implementation is primarily the responsibility of the Transitional Council, the BDDT-N will be able to focus more of its attention on the ongoing regulation of the Profession and in preparing the hand-over of its responsibilities and assets to the College of Naturopaths of Ontario.

There has recently been mounting media attention on the practice of naturopathy in Ontario, in Canada and in North America. Some of the media attention has been generated by unorthodox practice, or unorthodox statements by persons holding themselves out as Naturopaths who are not Registrants of the BDDT-N. From time to time the BDDT-N may ask to meet with the editorial boards of various newspapers in an attempt to correct facts or influence positions that may appear in the various media outlets.

As is the case with the RHPA Colleges, prosecuting unauthorized practice or unauthorized holding out is a challenge for the Board. Nonetheless, negative media attention puts an additional onus on the Board to acquaint the public with the fact that naturopathy is a regulated profession in Ontario with its own Standards of Practice, professional policies and guidelines and a publicly-accessible complaints and disciplinary process; and for the Board to urge members of the public to ensure they are consulting only those Naturopaths who are Registrants in good standing with the Board.

Federal initiatives with respect to Natural Health Products have to be carefully monitored and coordinated with Ontario's initiatives in order to ensure continuity of care for patients by maintaining the scope of practice of NDs in Ontario. The concern relates to initiatives at the federal level to transfer substances that are or were previously available over-the-counter to schedules under the *Food and Drugs Act* that require a prescription. The Board will continue to work closely with the Canadian Association of Naturopathic Doctors in this regard so that patients continue to have access to a consistent and high level of care.



ENVIRONMENTAL SCAN - ASSESSMENT OF ISSUES FACING THE AGENCY

There are two voluntary professional associations that represent Naturopaths in Ontario: the Canadian Association of Naturopathic Doctors (CAND) and the Ontario Association of Naturopathic Doctors (OAND). The CAND focuses on national issues that impact on the profession across the country and the OAND focuses on Ontario-specific issues.

While the Board meets regularly with the two associations and with other stakeholders within the naturopathic profession, the differing mandates and different approaches in strategy between the OAND and the Board sometimes cause tension between the organizations and confusion for Registrants.

Registration of Qualified NDs

The BDDT-N is responsible for regulating the Profession in the public interest. In order to do so the Board registers qualified individuals who have met the standards set by the Board; standards that are consistent with other naturopathic regulators in Canada and the United States. NDs in Ontario must have graduated from a program that is accredited by the Council on Naturopathic Medical Education before being eligible to sit for the international Naturopathic Physicians Licensing Examinations (NPLEX) entry to practise series as well as Ontario Jurisprudence and practical examinations that are set and administered by the BDDT-N. These examinations are offered twice annually. Following these examinations the Board holds an orientation session for successful candidates to inform them of their responsibilities as regulated health care professionals.

The Board meets regularly with the two Canadian colleges of naturopathy and the national and provincial associations to discuss matters of importance to the profession, as well as meeting annually with all of the North American colleges and regulators at the North American Board of Naturopathic Examiners advisory board on which the BDDT-N is represented. In this way, matters related to the education of NDs that impact on regulation are dealt with in a timely manner.

Registrants of the BDDT-N are required to renew their registrations annually on or before February 28 by completing a detailed application and paying the annual renewal fee. Although the DPA does not require continuing competency and currency for Registrants, the Board developed a policy requiring NDs to complete a minimum amount of continuing education (CE); a random audit of approximately 20% of registrants is conducted annually with registration renewal to ensure compliance. The CE Policy stipulates that NDs must obtain a minimum number of CE credits in the area of jurisprudence in order that they are aware of their obligations. The Board offers jurisprudence courses in various venues for registrants.

To enhance public protection with respect to the practice of Naturopathy, the Board made a decision to put in place new requirements for all registrants to obtain a vulnerable sector criminal records check that must be updated regularly. Collection of this sensitive information requires that effective measures be put in place to protect practitioner privacy. The Board is currently consulting with the OPP with respect to these measures.

In order to facilitate movement of NDs among the provinces and territories and to facilitate assessing competencies of international applicants to the profession, the BDDT-N is spearheading the development of a competency profile in collaboration with other Canadian regulators and stakeholders. The BDDT-N is working on a proposal to obtain funding assistance from Human Resources and Skills Development Canada for this project.



STRATEGIC DIRECTIONS

Meetings of the Board of Directors and Committees

Historically the BDDT-N held monthly in-camera meetings to deal with all matters related to regulation, including sensitive information related to complaints and other matters that are not appropriate for a public forum. Over the past few years, however, more and more of the detailed work is being handled by committees chaired by Board members that meet monthly or as necessary, by teleconference or in person. Committees have been established to provide advice to the Board in the areas of: complaints; continuing education; entry to practice examinations; parenteral therapy certification; and development of standards of practice and guidelines for patient care. As a result, the Board has moved to quarterly public meetings of the full Board where major decisions are made using information contained in reports from the various committees.

Communications and Training

In addition to the quarterly Board meetings, Board members regularly attend meetings of naturopathic stakeholders, other regulators and regulated health professions and with officials of various government ministries. Board members also undertake training in leadership geared to professional regulation from organizations such as the Council on Licensure Enforcement and Regulation (CLEAR) and the Federation of Health Regulatory Colleges and they attend conferences related to the practise of the profession.

The Board has approved a budgetary item that provides for training of BDDT-N staff to ensure that employees are up-to-date in areas such as financial systems, management, violence and harassment in the workplace and Alternative Dispute Resolution. Senior staff also attend the CLEAR conferences and profession-specific conferences to keep up-to-date on the latest advances in professional regulation generally and with the naturopathy profession in particular.

In order to ensure that Registrants are kept informed of important public protection matters, the BDDT-N has developed a communications plan that includes publication of a newsletter three times each year, regular email communications on time-sensitive issues and development of a more up-to-date website on which Board submissions and other communications are published. The BDDT-N delivers courses for Registrants to ensure they are aware of their obligations with respect to record keeping and arranges training in emergency medicine related to parenteral therapy.

The website and the Board's Annual Report provide important information, not only to Registrants, but also to the public and to other stakeholders. The communications plan will include a strategy for keeping Registrants informed about regulatory matters, to ensure that NDs are clear that the Board continues to regulate the profession throughout the transitional process and to acquaint the public with the need to confirm that their Naturopath is registered with the BDDT-N. The Board also believes it is important to



STRATEGIC DIRECTIONS

inform the public as to the scope of practice for Naturopaths and that a regulatory body exists to address any breach of standards.

Operations at the Board Office

The Board has approved the addition of another staff person to assist in meeting the goals that have been set for the transitional period, while also looking at ways to retain staff until the time comes for the Board to pass the reins to the College of Naturopaths of Ontario

The Board was disappointed that the offices of the Transitional Council for the College of Naturopaths of Ontario were not co-located with the BDDT-N in order to maximize efficiencies and facilitate the transition process. Nonetheless, the BDDT-N stands ready to provide whatever support the TC requires and where applicable, the Board's decisions are made in anticipation of the handover of regulatory responsibilities and the transfer of assets. The Board has provided the TC with an electronic list of current Registrants and updates this list regularly.

Staff at the office respond promptly to questions from the public, provide up-to-date information on registration status and provide practice-related advice on regulatory matters to Registrants.

The Board employs an outside firm to deal with IT matters as they arise.

Complaints and Discipline

The Board has in place a process for addressing complaints and disciplinary matters involving its Registrants. The limitations of the DPA create a number of challenges, particularly with respect to resolution of complaints. The DPA does not provide the public with assurances of unbiased processes for dealing with complaints and discipline or viable options for dealing with misconduct and incompetence. Nor does it provide a mechanism for appeals. In an attempt to insulate Board members from unnecessary involvement in the detailed investigation and resolution of complaints and without usurping the Board's decision-making responsibility, the Board has established a Complaints Resolution Committee (CRC). The CRC provides support to the Board by conducting a detailed review of all complaints and making recommendations to the Board with respect to the investigation and disposition of complaints. The Board then makes the final decision as to the disposition of each complaint.



STRATEGIC DIRECTIONS

There is also an issue related to unregistered persons holding themselves out as NDs. The legislation provides title protection only for the very antiquated term, “Drugless Therapist”, a term the public is completely unfamiliar with and that has not been in common usage for many years. Since there is no mechanism within the Act itself for dealing with unregulated persons, the Board attempts to address the more serious situations where the public is being misled by initiating Provincial Offences prosecutions. These prosecutions are expensive and time consuming.



OVERVIEW OF AGENCY'S CURRENT AND FORTHCOMING PROGRAMS/ACTIVITIES

The BDDT-N has no projected plans for capital expenditures. The following list outlines activities and programs the BDDT-N carries out as per its mandate. These activities are projected to continue over the next three to five years as the BDDT-N completes its transition to the College of Naturopaths of Ontario.

- Process Applications for Initial Registration
- Process Annual Registration Renewal Applications
- Process Applications for Re-entry to Practice
- Process Annual PT Certification Renewals
- Conduct CE Audit Annually
- Produce Annual Report
- Issue Regular Newsletters
- Provide Education and Training for Staff, Board and Committee Members
- Investigate Complaints and Conduct Disciplinary Procedures
- Conduct Regulatory Board Examinations for Entry to Practice twice each year
- Conduct PT Certification Examinations twice each year
- Hold Quarterly Board Meetings
- Hold Regular Committee Meetings
- Administer Board Mandated Courses for Registrants
- Deliver Jurisprudence Presentations for Registrants
- Host Annual New Registrant Orientation
- Develop Competency Profile in Consultation with other Regulators
- Meet Regularly with Stakeholder Groups
- Office Administration and Management of Operations
- Develop and Maintain Effective Website



OVERVIEW OF AGENCY'S CURRENT AND FORTHCOMING PROGRAMS/ACTIVITIES

- Respond to Inquiries from Public, Registrants and Stakeholders
- Revise and/or develop Standards and Guidelines for Registrants



RESOURCES REQUIRED TO MEET GOALS AND OBJECTIVES

The Board, committees and members of staff will work together to adequately communicate with relevant stakeholders, to fulfill the Board's public mandate, to fulfill program objectives and meet performance goals set out in this Business Plan and Budget. Resources will be allocated efficiently to each of the tasks that make up the day-to-day operations at the BDDT-N to ensure maximum value for Registrant fees. Consistent resources required to manage day to day operations include: Staff time resources, printing, mailing, supplies, credit card fees, outside professional consulting, budget allocation, salaries & benefits and approval of activities from the Board of Directors. The BDDT-N prides itself on efficiently utilizing resources and keeping expenses to a minimum. The BDDT-N strives to build and maintain the public's, Registrants' and stakeholders' trust in carrying out its mandate while working towards a smooth transfer of assets and responsibilities to the College of Naturopaths of Ontario. This transfer is projected to take place by March 31, 2013.



FINANCIALS - PROPOSED OPERATING EXPENDITURES, PROJECTED REVENUES & FUNDING REQUIREMENTS

2007 and 2008 Actual Income & Expenditures		
Income	2007	2008
Board Exam Fees	6,781.82	8,699.04
Initial Registration fees	21,175.00	36,250.00
Interest Income	13,478.36	16,120.36
Active Renewal Regis fees	415,550.00	650,825.00
Inactive Renewal Regis fees	20,518.63	41,261.01
Late registration fees	5,350.00	8,150.00
PT Certification fees	50,700.00	54,050.00
PT Exam fees	9,700.00	14,025.00
CE Extension Admin fee	900.00	600.00
Miscellaneous	940.00	1,102.75
Interest Income (legal reserve)	3,682.11	3,879.88
Total Income	548,775.92	834,963.04
Expenses		
Advertising & Communications	11,239.01	8,476.59
Complaints & Discipline	75,287.73	70,616.08
Examinations	5,117.20	5,198.97
Parenteral Therapy	7,899.12	14,623.68
Administrative Expenses	106,341.53	138,378.64
Professional fees	114,352.49	131,563.66
Conferences/Conventions/Meetings	17,351.17	11,223.98
Salaries & Benefits	140,558.58	206,903.77
Board & Committee Members' honoraria & expenses	67,800.00	56,700.00
Other Meetings, Projects	1,711.14	9,502.49
Total Expenses	547,657.97	653,187.86
Net surplus (loss)	1,117.95	181,775.18



FINANCIALS - PROPOSED OPERATING EXPENDITURES, PROJECTED REVENUES & FUNDING REQUIREMENTS

2009 Actual Budget and 2010 Projected Budget

Income	2009 Actual	2010 Actual
Board Exam Fees	9,727.00	12,553.00
Initial Registration fees	37,250.00	51,350.00
Interest Income	6,329.00	14,760.00
Active Renewal Regis fees	693,950.00	745,311.00
Inactive Renewal Regis fees	49,617.00	43,902.15
Late registration fees	2,400.00	3,850.00
PT Certification fees	60,300.00	68,233.00
PT Exam fees	13,025.00	17,975.00
CE Extension Admin fee	1,600.00	400
Miscellaneous	7,974.00	1,085.00
Interest Income (legal reserve)	4,331.59	7,704.00
Total Income	886,503.59	967,123.00
Expenses		
Advertising & Communications	13,907.93	12,469.57
Complaints & Discipline	57,926.16	84,775.90
Examinations	8,894.64	12,321.70
Parenteral Therapy	14,466.50	10,534.14
Administrative Expenses	137,169.78	137,202
Professional fees	141,144.00	160,972
Conferences/Conventions/Meetings	22,744.65	21,964.00
Salaries & Benefits	245,093.15	286,851
Board & Committee Members' honoraria & expenses	61,261.00	69,499
Other Meetings, Projects	15,497.99	1,623.53
Total Expenses	718,105.80	798,212.84
Net surplus (loss)	168,397.79	168,910.16

*The BDDT-N has a goal of maintaining the current balance of the Legal Reserve fund as an asset on the balance sheet. Expenses are reflected under complaints and discipline on the income statement. In the event additional money is drawn from the Legal Reserve Fund beyond the projected expenses, that money is replenished at the end of each year out of the surplus revenues.



FINANCIALS - PROPOSED OPERATING EXPENDITURES, PROJECTED REVENUES & FUNDING REQUIREMENTS

BUDGET 2010-2013 – Projected Financials

	\$	\$
Income	2010 Budget	2011 Projected
Board Exam Fees	9,000	9,600
Initial Registration fees	40,000	50,000
Interest Income	6,500	15,000
Active Renewal Regis fees	720,000	819,000
Inactive Renewal Regis fees	47,000	42,500
Late registration fees	2,700	3,150
PT Certification fees	60,000	72,000
PT Exam fees	12,000	16,000
CE Extension Admin fee	400	1,600
Miscellaneous	1,500	1,500
Interest Income (legal reserve)	4,000	6,120
Total Income	903,100	1,036,470
Expenses		
Advertising & Communications	23,000	48,500
Complaints & Discipline	90,700	130,000
Examinations	10,400	12,500
Parenteral Therapy	16,000	50,000
Administrative Expenses	194,490	214,500
Professional fees	146,500	169,500
Conferences/Conventions/Meetings	17,700	23,620
Salaries & Benefits	294,848	314,361
Board & Committee Members' honoraria & expenses	64,500	67,000
Other Meetings, Projects	9,500	4,500
Total Expenses	872,938	1,034,481
Net surplus (loss)	\$30,162	\$1,989



FINANCIALS - PROPOSED OPERATING EXPENDITURES, PROJECTED REVENUES & FUNDING REQUIREMENTS

Income	\$	\$
	2012 Projected	2013 Projected
Board Exam Fees	8,000	8,000
Initial Registration fees	44,100	44,100
Interest Income	10,996	11,000
Active Renewal Regis fees	859,950	903,000
Inactive Renewal Regis fees	54,500	55,250
Late registration fees	3,600	4,050
PT Certification fees	74,000	80,000
PT Exam fees	10,400	9,600
CE Extension Admin fee	500	700
Miscellaneous	1500	1500
Interest Income (legal reserve)	6,400	6,500
Total Income:	\$1,073,946	\$1,123,700
Expenses:		
Advertising & Communications	50,000	50,000
Complaints & Discipline	130,000	130,000
Examinations	11,000	11,000
Parenteral Therapy	50,000	50,000
Administrative Expenses	202,000	206,000
Professional fees	180,000	180,000
Conferences/Conventions/Meetings	24,000	24,000
Salaries & Benefits	339,848	339,848
Board & Committee Members' honoraria & expenses	68,000	68,000
Other Meetings, Projects	10,500	11,000
Total Expenses	\$1,065,348	\$1,069,848
Net surplus (loss)	\$8,598	\$53,852



FINANCIALS - PROPOSED OPERATING EXPENDITURES, PROJECTED REVENUES & FUNDING REQUIREMENTS

Board of Directors of Drugless Therapy – Naturopathy

Statement of Financial Position as of December 31, 2010

ASSETS

CURRENT ASSETS:

Asset	2009	2010
Cash	\$10,085	\$--
Temporary Investments	\$793,012	\$963,615
Prepaid amounts	\$4,051	\$4,099
Total:	\$807,148	\$967,714

CAPITAL ASSETS:

Capital Assets (with depreciation)	\$10,000	\$7,434
Total Assets:	\$817,148	\$975,148

LIABILITIES AND FUND BALANCES

CURRENT LIABILITIES:

Bank Overdraft		\$2,203
Accounts payable and accrued liabilities	\$19,773	\$39,672
Deferred revenue	\$150,636	\$166,842
Total:	\$170,409	\$208,717

FUND BALANCES:

General Fund – Unrestricted	\$424,930	\$585,194
Legal Reserve Fund - Restricted	\$221,930	\$181,237
Total:	\$647,739	\$766,431

Total Liabilities and Fund Balances:	\$817,148	\$975,148
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*Once the Transitional Council for the College of Naturopaths of Ontario has completed its work, the BDDT-N is responsible for the smooth transfer of assets to the College. This may result in a material impact on the financial position of the BDDT-N due to expected costs associated with legal fees, accounting, severance and other expenses related to the transfer of assets and the winding-up of the Board. The transition to the College of Naturopaths of Ontario is expected to take place by March 31, 2013.



FINANCIALS - PROPOSED CAPITAL EXPENDITURES

There are currently no plans for the BDDT-N to undertake any material capital expenditures between 2011 and 2013. There are no plans to renovate offices or upgrade equipment, software or IT capabilities. There should be minimal changes of asset or liability figures from the 2010 BDDT-N Statement of Financial Position (balance sheet) projected over the next three years.

The BDDT-N plans to redesign its website for the benefit of stakeholders. It is not anticipated that the new design will have a material impact on current IT related costs.



SUMMARY OF STAFF NUMBERS

The BDDT-N office has a small staff that is responsible for carrying out the directives of the Board and all of the day-to-day activities of the BDDT-N. There is a significant amount of sharing of responsibilities among staff, particularly during the registration renewal period and examinations period.

Key areas of responsibility for each member of the Administrative Staff at the BDDT-N include:

Executive Director - overseeing the overall operations of the BDDT-N, liaising with government and other stakeholders and providing direction on complaints and disciplinary files.

Executive Administrator - management of the complaints process, overseeing BDDT-N finances and providing administrative support to Committees.

Communications and Examinations Coordinator - is responsible for communicating to and with Registrants, stakeholders, members of the Examinations, Parenteral Therapy and Registration Committees, and for coordinating the registration and examinations processes.

Bookkeeping and Committee Support Coordinator – is responsible for maintaining the ongoing accounts payables and receivables accounts, coordinating the annual CE Audit, providing support to the CE and CRC Committees and for the Board meetings, assisting with Complaints files and PT Inspections.

Administrative Assistant – is responsible for answering telephone calls, opening mail, updating the database, filing documents, preparing documents and packages for mailing or courier, assisting other staff with ongoing work and special projects, drafting correspondence for signature, other duties as assigned by the Executive Director.

The Board has approved the recruitment of another staff person to assist with meeting the goals that have been set for the transitional period, while also looking at the best way to retain experienced staff until the Board is ready to pass the reins to the College of Naturopaths of Ontario.

It is projected that one new employee will be hired in 2011. The total salaries for the 5 employees at the BDDT-N is approximately \$256,000. This does not include benefits, temporary help, support for the CRC (which is included in the budget under Complaints), consultants and legal council. Salaries, benefits, expenses and consulting fees compare favourably with benchmarks established by other Professional regulatory bodies in Ontario.



PERFORMANCE MEASURES AND TARGETS

Performance	Measurement	Target
Regulate the Profession in the public interest until the new College of Naturopaths of Ontario is ready to commence regulation of the profession	<ul style="list-style-type: none"> -Work with Public Appointments Unit and Office of the Procurement Ombudsman to recruit and retain strongest Board members and staff possible. - - Efficient, effective, fair and transparent complaints and discipline process. Total number of complaints will be tracked along with the time required to complete process -Produce annual reports and business plans once per year to ensure effective regulation of the profession under DPA (mirror RHPA as much as possible). -Timely registration of qualified applicants. Our goal is to process complete applications within 3 days. 	Continuous
Transfer assets to the College of Naturopaths of Ontario	<ul style="list-style-type: none"> - Prepare final audited financial statements prior to the transfer of assets projected to take place in 2013. - Retain relevant expertise and Design and provide severance packages for employees 	Upon proclamation expected in 2013.
Timely communications with stakeholders and media	<ul style="list-style-type: none"> -Complete new website as soon as practicable -Post Annual Report and Business Plan online starting in 2011 fiscal year. -Board meetings that are open to the public take place once per quarter. -Rapid response to media as required. Within five business days 	Continuous



PERFORMANCE MEASURES AND TARGETS

	<p>of initial article being posted.</p> <ul style="list-style-type: none"> -Newsletters to Registrants and other stakeholders. Goal 3 per year. -Email communications on time sensitive matters within 24 to 48 hours. - General communications by email, projected at 6 times per year. -Meet at least twice per year with teaching colleges, other naturopathy regulators and associations. - Meet with MOHLTC as required and at a minimum twice per year. 	
Ensure competency of Registrants	<ul style="list-style-type: none"> -Administer entry to practice examinations twice per year. - Provide jurisprudence education through conferences, seminars and questionnaires at least three times per year. - 20% of Registrants subject to an Audit of CE per two year reporting cycle. - Review and develop and update standards on an annual basis 	Continuous
Collaborate with other health care professionals and Ministry	<ul style="list-style-type: none"> --Meet at least twice per year with teaching colleges, other naturopathy regulators and associations. -Meet at least once per year with the Ministry of Health and Long-Term Care to collaborate on initiatives and to solicit advice and feedback. 	Continuous



PERFORMANCE MEASURES AND TARGETS

Provide fair access to qualified practitioners	<ul style="list-style-type: none">- Facilitate movement of NDs from other provinces and internationally by developing competency profile by the end of 2013.- Voluntary compliance with Fair Access to Regulated Professions Act (as much as permitted under the DPA) by the end of 2011.	Continuous
Provide Registrant support	<ul style="list-style-type: none">- New Registrant Orientation session once per year within 3 months of entry to practice examination results.- Respond to email and telephone inquiries from Registrants in a timely manner, within 3 business days.	Continuous
Communications on regulatory issues with government and media	<ul style="list-style-type: none">-Editorial Board meetings as required.-New Website to be completed as soon as practicable.- Post standards of practice, complaints process and general information for the public on website as required. Explore the potential of using social media as an additional tool for communications with stakeholders.	Continuous



RISK ASSESSMENT AND MANAGEMENT

Risk Factor	Description	Likelihood of occurrence (High, Medium, Low)	Impact if risk realized (High, Medium, Low)	Mitigation Strategy
Financial	Not being able to fully fund mandate	Low	High	Accountable and transparent budgeting. Business plan and annual report. Audited financial statements. Maintain a surplus.
Maintaining a full complement of Board members	Not being able to achieve mandate due to lack of sufficient Board members to form unbiased panels for dealing with complaints and discipline	Medium	Medium	Obtain commitment from Ministry to move quickly to fill vacancies with qualified applicants.
Media	Incident or opinion in media that jeopardizes public confidence in naturopathy.	High	High	Rapid response to editorials, columns and all media reports, communications plan in place. A rapid response between 24-48 hours will be undertaken to quickly correct any misinformation in the media in order to mitigate any impact such misinformation would have.



RISK ASSESSMENT AND MANAGEMENT

Contested legal issue	Incident that requires expensive litigation	Medium	High	<p>Fair and transparent complaints process.</p> <p>Timely and informed responses to inquiries.</p> <p>Training and education of Registrants.</p>
Government legislation	Potential legislation that may impact BDDT-N or Profession	Low	Medium	<p>Maintain relationship with government and Ministry. Clear communication.</p> <p>Government relations plan.</p>
Staff Turnover	Key staff members leaving for other opportunities particularly in light of the uncertainty as to when the BDDT-N will hand over the reins to the College of Naturopaths of Ontario	Medium	Medium	<p>Maintain strong morale, provide good benefits and supports, clear job descriptions and communication in office.</p>



COMMUNICATIONS PLAN

The following chart outlines the annual milestones, tasks and resources required to fully implement the Business Plan between 2011-2013. Achievement of the implementation plan will be measured against the target timelines in future annual business plans. The goal of this implementation plan is to coordinate action among the Board, committees, staff, Registrants and other key stakeholders. Currently the BDDT-N is focused on its mandate and operations as it prepares for the transfer of assets and transition to the College of Naturopaths of Ontario.

This Business Plan including the implementation plan has been approved by the Board of Directors, and, upon approval by the Ministry, will be distributed to staff and posted on-line. Progress will be measured against performance targets on an annual basis.

Date	Action Required	Resources Required
2011	New website, new hire, training, conferences, newsletters, committee and Board meetings, stakeholder meetings, exams, complaints, media monitoring, email communications to Registrants, orientation, business plan and Annual Report 2011.	Staff time resources, printing, mailing, supplies, credit card fees, legal counsel, outside consulting, Web designer, budget allocation, salaries & benefits and approval from the board.
2012	Training, conferences, newsletters, committee and Board meetings, stakeholder meetings, exams, complaints, media monitoring, email communications, business plan and Annual Report 2012	Staff time resources, printing, mailing, supplies, credit card fees, legal counsel, outside consulting, budget allocation, salaries & benefits and approval from the board.
2013	Smooth transfer of assets and transition to the College of Naturopaths of Ontario. BDDT-N will fulfill its current mandate and activities until that event takes place, projected to be March 31, 2013.	Staff time resources, printing, mailing, supplies, credit card fees, legal counsel, outside consulting, budget allocation, salaries & benefits and approval from the board. Additional legal, accounting and consulting will be required during the transition process.



COMMUNICATIONS PLAN

Target Audience: general public, Registrants, staff, associations other regulatory Colleges, Ministry of Health and Long-Term Care

Core Messages:

- 1. Scope of practice for NDs**
- 2. Importance of continuing education**
- 3. NDs important part of health care delivery system**
- 4. BDDT-N effective regulator**
- 5. Public process for registering complaints against NDs**
- 6. Transition from DPA to RHPA**

It is important to report the activities of the BDDT-N to stakeholders including Registrants, government, naturopathic regulators, naturopathic educational institutions and associations, other regulatory Colleges, as well as to staff and the general public. The BDDT-N communications plan will be revised to include a strategy for keeping Registrants informed about regulatory matters, to ensure that NDs are clear that the Board continues to regulate the profession throughout the transitional process and that the DPA scope of practice remains until the transition is complete, and to acquaint the public with the need to confirm that their Naturopath is registered with the BDDT-N. The Board also believes it is important to inform the public as to the scope of practice for Naturopaths and that there is a regulatory body in place to address any breach of standards. The Board will also continue to develop its relationships with the RHPA Colleges, particularly those with whom the naturopathic scope of practice overlaps.

In order to achieve this objective the BDDT-N plans to:

- Hold public Board meetings quarterly to address areas such as registration, standards of practice, finances and complaints and discipline procedures. In addition, the Board has established the following committees or working groups: Complaints Resolution, Standards, Examinations, Continuing Education, and Parenteral Therapy.
- Publish a newsletter approximately three times per year. The BDDT-N will also inform its Registrants through email on time-sensitive issues.



COMMUNICATIONS PLAN

- Release annual reports for the Ministry, Registrants and other stakeholders and the public; within 4 months of the end of each financial year.
- Offer courses, seminars and training to Registrants in accordance with its public protection mandate and attend professional development conferences.
- Continue to hold an annual orientation session for candidates who have met the requirements to apply for initial registration to inform them of their responsibilities as regulated health care professionals and of the role of the BDDT-N.
- Attend regular meetings and initiate communication with partners and stakeholders in government, academia, the profession and regulatory bodies in Ontario and other jurisdictions. Representatives of the BDDT-N also meet with regulators and health practitioners in other fields to facilitate collaboration.
- Continue to use advertising for Registrants and public communications. An increased budget has been projected for the purpose of increasing the profile of the BDDT-N and Profession between 2011-2013 in anticipation to the transition to the College of Naturopaths. Advertising will be targeted to registrants, the general public and other relevant BDDT-N stakeholders.
- Issue prompt media releases and alerts when necessary.
- Monitor the media and respond to any editorials, articles or columns containing incorrect information about the practice or regulation of the profession.
- Explore the potential use of social media as an additional tool to communicate with stakeholders.
- Complete the redesign and enhancement of the BDDT-N's website for which the Board previously allocated funds. The BDDT-N website is at URL: <http://www.boardofnaturopathicmedicine.on.ca>
- The BDDT-N will use all tools available in order to fulfill its mandate of public protection with respect to the practice of Naturopathy and to ensure that all stakeholders including Registrants, staff, other professional regulators, government and the general public are aware of the activities undertaken by the BDDT-N in a transparent fashion.
- All communication activities will comply with relevant privacy legislation.



APPENDIX

Annual Report 2010