

June 27, 2011

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

Dear Basil,

On behalf of the Board and members of the Canadian Society of Homeopaths (CSH), I want to thank the members and staff of the Transitional Council for your work on establishing the College of Homeopaths of Ontario. We also appreciate the recent invitation to provide feedback on the draft regulations for Registration, Professional Misconduct, and Quality Assurance prior to public consultation.

The Canadian Society of Homeopaths (CSH) is a voluntary registering body with nearly 200 members in Ontario -- over 150 professionals and approximately one-fifth that number students -- all of whom will be impacted by these regulations. Our Board is particularly concerned that the regulations avoid favouring specific interests in the profession at the expense of the overall public interest in Ontario.

We are assuming that the Transitional Council genuinely seeks input from stakeholders in order to improve the draft before presenting it to the public. We are prepared to respond in kind, by identifying areas that require improvement and developing alternative language that will minimize concerns during the public process. However, we believe that it is not reasonable for the Transitional Council to expect any group to prepare a responsible response to something this complex and important in less than 3 working days.

We were introduced to the draft and other documents on the evening of Wednesday, June 22. At this meeting we were informed of the timeline and that our feedback was required by Monday, June 27. It was not until the following evening, though, that we were given an opportunity to seek clarification and legal interpretations, which further limited the amount of time we had to prepare a response.

After an initial review, our most significant concern at this time is that the draft document is incomplete. It references, but provides no details of, key components of the registration regulations. These include expectations of the prior-learning assessment and identifying and rectifying deficiencies in competency. As an example, the draft refers to the "College of Homeopaths of Ontario Entry-to-Practise Competencies document dated January 31, 2012", which we were informed will be developed later, followed by further consultation.

These are the most sensitive and potentially controversial elements of the regulations and it is essential that they are considered within the context of the regulations as a whole. Without the ability to view these related documents, stakeholders are unable to adequately evaluate and provide thoughtful and constructive feedback.

We believe that the Transitional Council has created an unnecessarily rushed timeline in order to submit regulations to the Ministry of Health and Long-Term Care by October, 2011. Working under this kind of pressure is not conducive to ensuring that the regulations are both effective and fair.

The Transitional Council has had over a year to develop these regulations and we believe that stakeholders ought to be given a reasonable amount of time to formulate a meaningful response, based on full disclosure of all parts of the regulations. Once the complete regulations are available, we will need time to examine the draft version thoroughly; to identify the anomalies and concerns; to prepare new language, along with background and rationale; and to review the changes in context with the rest of the document. In this way, stakeholders can assist the Transitional Council to create regulations that fulfill its mandate to protect the public, ensure access to all competent homeopaths, and include all styles of practice.

Therefore we respectfully request that the Transitional Council act in good faith by re-drawing the timeline and committing to the following:

1. To prepare a full and complete regulation document before releasing it for stakeholder and public consultation; and
2. To provide a reasonable length of time for stakeholders to respond responsibly to the complete document.

In so doing, the actions of the Transitional Council will best serve the public interest and will ensure that all approaches to the practice of homeopathy will be included in the new College of Homeopaths of Ontario.

Thank you.

Sincerely,

Jo Twiss, RCSHom  
President, Canadian Society of Homeopaths