



National Certification Board for Natural Therapies

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April 6, 2018

Carleton Grant
Director, Policy and Strategic Support
Municipal Licensing & Standards

RE:

CITY OF TORONTO MORATORIUM ON THE ISSUANCE OF NEW LICENSES TO
HOLISTIC PRACTITIONER APPLICANTS ASSOCIATED WITH FIVE PROFESSIONAL
HOLISTIC ASSOCIATIONS

Dear Mr. Grant and MSL Officers:

I am writing behalf on our Board of Directors. We received a letter from you today regarding the *City of Toronto moratorium on the issuance of new licenses to holistic practitioner applicants associated with five professional holistic associations*, our association is one of the five associations. The reason for the interim measure pending is 98% of all bylaw charges and 97% of all convictions incurred by holistic practitioners from 2014-2017 linked to those associations.

I would like to contribute my comment to this matter for your reference in the April 10's Licensing and Standards Committee Meeting.

Bylaw charge/Conviction Percentage Issue:

I think the reason for so high percentage of the bylaw charges and convictions belong to those association because those associations hold most holistic practitioners in Toronto. For example, our association has more than 2 thousands members, if 3% of them got bylaw charge that will be 60 people, but if another PHA has only 100 members, same 3% members got bylaw charged, that will be 3 people. You cannot blame that 95% of the bylaw charges belong our association and give us the *moratorium*, but the small association could be better. In this example, we all get 3% members got bylaw charged, both associations are no different.

Our association has more than three thousand registered members in the last ten years, currently have 1993 active members.

Qualification of Membership:

Our association carefully obeys the PHAs regulation to review members applicants' qualification in education and work experience, we have minimum educational requirements for entry (<http://ncbnt.org/ncbnt/education-requirements/>), only qualified applicants will be accepted.

Bylaw charge/Conviction Self Report and Membership Annual Renewal Issue:

PHAs annual renew memberships based on their self-report. When they renew their membership, we ask them to fill up renewal application to report any bylaw charge and conviction, which is the only source we know if the member got bylaw charged or not, if they do not report, we do not know. In the last ten years, we canceled over two hundred membership who reported their bylaw charge conviction.

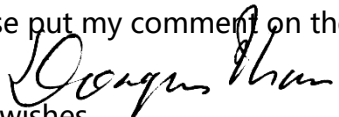
Everybody knows Some holistic practitioners break municipal's bylaws and do something sexual related with their clients during their practice, it is the big issue beyond PHA's power to manage, what a PHA can do is stop their membership but we do not even know who got the bylaw charge and conviction if there do not report, as MLS does not share the information with associations. I do not think it is correct to blame PHA for that. MSL and police work hard to stop this issue but the result was not that satisfying.

I think PHAs and MSL have to work together to resolve the problem, simply remove a PHA from PHAs list does not help, the holistic practitioner will look for another association's membership, never let the association know their conviction of bylaw charge, you will face the same problem as that association get more members and show you their members have high percentage of bylaw charge conviction.

Bylaw Continuing Education:

Our association have online courses focusing on for holistic bylaws for members, we require all member to study the courses time by time as a continuing education requirement. We also regularly send newsletters and hold seminars to educate members to obey the bylaws and learn holistic manual therapy techniques.

Please put my comment on the meeting.


Best wishes,

Dongxia Zhao, President
National Certification Board for Natural Therapies