

STATEMENT OF SPECIFIED ALLEGATIONS

The Member

1. Jennifer Hudson (“the Member”) became a member of the College of Kinesiologists of Ontario (the “College”) in or around April 2013.
2. At all relevant times, the Member was in the General Class.

Quality Assurance Program

3. Pursuant to s. 82(1) of the *Health Professions Procedural Code* (the “Code”) and s. 4(1) of Regulation 29/13 (the “Quality Assurance Program Regulation”), members in the General class are required to comply with the requirements of the College’s Quality Assurance Program which include self-assessment, continuing education and professional development activities annually.
4. Pursuant to s. 7 of the Quality Assurance Program Regulation, a member shall undergo a peer and practice assessment (PPA) if the member’s records do not demonstrate that the member has engaged in adequate self-assessment, continuing education or professional development activities.

Failure of Member to comply with Quality Assurance Program

5. The Member did not complete the 2017 self-assessment which is a mandatory component of the Quality Assurance Program.
6. As a result, on or about September 18, 2018, the Member was advised that she was required to participate in the PPA.
7. The Member failed to respond to numerous written queries and requests from the College regarding the PPA.
8. The Member failed to complete the PPA.

Acts of Professional Misconduct

9. As a result of the above, it is alleged that the Member engaged in professional misconduct pursuant to s. 51(1)(c) of the Code, as set out in one or more of the following paragraphs of section 1 of Ontario Regulation 316/12:

- a. **Paragraph 40** - Contravening, by act or omission, a provision of the Act, the *Regulated Health Professions Act, 1991* or the regulations under either of those Acts;
 - b. **Paragraph 48** - Failing to reply appropriately and within a reasonable time to a written inquiry or request from the College; and/or
 - c. **Paragraph 50** - Engaging in conduct or performing an act relevant to the practice of the profession that, having regard to all the circumstances, would reasonably be regarded by members as disgraceful, dishonourable or unprofessional.
10. In addition, it is alleged that the Member engaged in professional misconduct pursuant to s. 51(b.0.1) of the Code as she failed to co-operate with the Quality Assurance Committee.