

Registration Practices Assessment Report
COLLEGE OF DENTURISTS OF ONTARIO
2018 Assessment (Cycle 3)

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AVAILABILITY OF REPORT

This report is provided by the OFC to the regulatory body assessed. The OFC will, upon request, release the report to other parties. The OFC will also post the report on its website. In the interest of transparency and accountability, the OFC encourages regulatory bodies to provide the report to its staff, council members, the public, and other interested parties.

Introduction

This report contains an assessment of registration practices of the College of Denturists of Ontario.

Assessment is one of the Fairness Commissioner's mandated roles under the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA) and the Regulated Health Professions Act, 1991 (RHPA) – collectively known as fair access legislation.

Assessment Cycle

One of the primary ways the OFC holds regulators accountable for continuous improvement is through the assessment of registration practices using a three-year assessment cycle.

Assessment cycles alternate between **full assessments** and **targeted assessments**:

- Full assessments address all specific and general duties described in the fair-access legislation.
- Targeted assessments focus on the areas where the OFC made recommendations in the previous full assessment.

In this assessment cycle, certain practices related to provision of information are excluded as the College has previously been assessed in these areas.^[1] In most cases, regulators that have previously been assessed have demonstrated compliance with these practices and will only be assessed should substantive changes arise in policies or practices.

Assessment Summary

The Office found the College in compliance with the OFC's fair registration practice standards, and did not identify any recommendations in this assessment cycle.

The full spectrum of College regulatory processes was audited by the Ministry of Health and Long-Term Care in 2012. The audit was triggered by gaps and deficiencies in the College's regulatory process, including examination administration, record retention, and registration documentation.

The OFC's assessment in 2013 covered similar ground as the audit, although the OFC assessment looked at different processes and practices and holds regulators to different standards of disclosure.

A key source of information for the OFC's current assessment is the College's progress on actions identified in the Ministry audit.

Specific Duties

Specific duties assessed

The regulator has been assessed on all of the specific duties identified in Schedule 2 of the *Regulated Health Professions Act*, with the exception of practices related to the provision of information.

Comments

The regulatory body has demonstrated all of the practices in the following specific-duty areas:

- Timely Decisions, Responses and Reasons
- Internal Reviews and Appeals
- Assessment of Qualifications
- Training
- Access to Records

General Duty

Assessment method

The regulator selected the following method for the assessment of the general duty:

a. OFC practice-based assessment (following the practices in the Assessment Guide)	<input checked="" type="checkbox"/>
b. Regulator practice-based self-assessment (following the practices in the Assessment Guide)	<input type="checkbox"/>
c. Regulator systems-based self-assessment (in which it explains systemically and holistically how it meets the general duty)	<input type="checkbox"/>

Principles assessed

The regulator has demonstrated compliance with all of the general duty principles: transparency, objectivity, impartiality and fairness.

Comments

The OFC found that since the last assessment, the College of Denturists of Ontario (CDO) has taken the following measures to ensure a transparent, objective, impartial and fair registration process.

Commendable Practices

A *commendable practice* is a program, activity or strategy that goes beyond the minimum standards set by the OFC assessment guides, considering the regulatory body's resources and profession-specific context. Commendable practices may or may not have potential for transferability to another regulatory body.

The regulatory body is demonstrating commendable practices in the following areas:

Specific Duty

1. The process for developing, validating and reviewing examination content is described in a foundation document, including the role of psychometric evaluators. Entry-to-practice competencies form the basis of examination content.

General Duty

1. The College has established a policy that defines criteria by which trained denturists are selected to assess applicants in the OSCE qualifying exam. – Objectivity
2. Examination assessors are required to disclose potential conflicts and sign a form attesting to fact. – Impartiality
3. Examination protocols for candidates are posted on the website - Fairness
4. Sample questions are posted on the website for the MCQ exam and the OSCE - Fairness

Opportunities for Improvement

The OFC has not identified substantive opportunities for improvement in registration practices in this assessment cycle.

Recommendations

None

Assessment History

In the previous assessment, the OFC identified 24 recommendations for the regulator, all of which have been implemented.

Detailed Report^[2]

Specific Duty

1. Specific Duty — Information for Applicants

Exempted as previously assessed.

2. Specific Duty — Timely Decisions, Responses and Reasons

FARPACTA, s. 8 and s. 9 (1)

RHPA, Schedule 2, s.20 (1)

**Only applies to regulatory bodies governed by FARPACTA*

1. If a regulator rejects an application, it gives written reasons to the applicant. [Fairness, Transparency]

Assessment Outcome
Demonstrated

2. The regulator makes registration decisions, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

3. The regulator responds to applicants' inquiries or requests without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

4. The regulator provides internal reviews of decisions, or appeals from decisions, without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

5. The regulator makes decisions about internal reviews and appeals, and gives written decisions and reasons to applicants, without undue delay*. [Fairness]

Assessment Outcome
Not Applicable

3. Specific Duty — Internal Review or Appeal

FARPACTA, s. 7, s. 9(2-3, 5)

RHPA, Schedule 2, s. 15, s. 17, s. 19, s. 22.3

**Only applies to regulatory bodies governed by FARPACTA*

1. The regulator provides applicants with an internal review of, or appeal from, registration decisions. [Fairness]

Assessment Outcome
Demonstrated

2. The regulator implements rules and procedures that prevent anyone who acted as a decision-maker in a registration decision from acting as a decision-maker in an internal review or appeal of that same registration decision. [Impartiality]

Assessment Outcome
Demonstrated

3. The regulator provides information on its website that informs applicants about opportunities for an internal review or appeal*. [Transparency]

4. The regulator provides information on its website about any limits or conditions on an internal review or appeal*. [Transparency]

4. Specific Duty — Information on Appeal Rights

Exempted as previously assessed.

5. Specific Duty — Documentation of Qualifications

Exempted as previously assessed.

6. Specific Duty — Assessment of Qualifications

FARPACTA, s. 10 (2)

RHPA, Schedule 2, s. 22.4(2)

**Only applies to regulatory bodies that develop and administer their own exams.*

1. On its website, the regulator informs applicants about the process, criteria, and policies for the assessment of qualifications. [Transparency]

Exempted as previously assessed.

2. The regulator communicates the results of qualifications assessment to each applicant in writing. [Transparency]

Assessment Outcome
Demonstrated

3. The regulator gives its assessors access to assessment criteria, policies and procedures. [Transparency]

Assessment Outcome
Demonstrated

4. The regulator shows that its tests and exams measure what they intend to measure.* [Objectivity]

Assessment Outcome

Demonstrated

Commendable Practice

The process for developing, validating and reviewing examination content is detailed for the MCQ and OSCE exams, and includes consultation with psychometric evaluators.
Entry-to-practice competencies form the foundation of examination content.

5. The regulator states its assessment criteria in ways that enable assessors to interpret them consistently. [Objectivity]

Assessment Outcome

Demonstrated

6. The regulator ensures that the information about educational programs that is used to develop or update assessment criteria is kept current and accurate. [Objectivity]

Assessment Outcome

Demonstrated

7. The regulator links its assessment methods to the requirements/standards for entry to the profession or trade. [Objectivity]

Assessment Outcome

Demonstrated

8. The regulator requires that assessors consistently apply qualifications assessment criteria, policies and procedures to all applicants. [Objectivity]

Assessment Outcome

Demonstrated

9. The regulator uses only qualified assessors to conduct the assessments. [Objectivity]

Assessment Outcome

Demonstrated

10. The regulator monitors the consistency and accuracy of decisions, and takes corrective actions as necessary, to safeguard the objectivity of its assessment decisions. [Objectivity]

Assessment Outcome

Demonstrated

11. The regulator prohibits discrimination and informs assessors about the need to avoid bias in the assessment. [Impartiality]

Assessment Outcome

Demonstrated

12. The regulator implements procedures to safeguard the impartiality of its assessment methods and procedures. [Impartiality]

Assessment Outcome

Demonstrated

13. The regulator gives applicants an opportunity to appeal the results of a qualifications assessment or to have the results reviewed. [Fairness]

Assessment Outcome

Demonstrated

14. The regulator assesses qualifications, communicates results to applicants, and provides written reasons for unsuccessful applicants, without undue delay. [Fairness]

Assessment Outcome

Demonstrated

15. Regulators that rely on third-party assessments establish policies and procedures to hold third-party assessors accountable for ensuring that assessments are transparent, objective, impartial and fair. [Transparency, Objectivity, Impartiality, Fairness]

Assessment Outcome

Demonstrated

7. Specific Duty — Training

FARPACKA, s. 11.

RHPA, Schedule 2, s. 22.4(3)

1. The regulator provides training for staff and volunteers who assess qualifications or make registration, internal review or appeal decisions. [Objectivity, Impartiality, Fairness]

Assessment Outcome

Demonstrated

2. The regulator addresses topics of objectivity and impartiality in the training it provides to assessors and decision-makers. [Objectivity, Impartiality]

Assessment Outcome

Demonstrated

3. The regulator identifies when new and incumbent staff and volunteers require training and provides the training accordingly. [Objectivity, Impartiality, Fairness]

Assessment Outcome
Demonstrated

8. Specific Duty — Access to Records

FARPACTA, s. 12
RHPA, Schedule 2, s. 16

1. The regulator provides each applicant with access to his or her application records. [Fairness]

Assessment Outcome
Demonstrated

2. If there is a fee for making records available, the regulator gives applicants an estimate of this fee. [Transparency]

Assessment Outcome
Not Applicable

3. If there is a fee for making records available, the regulator review the fee to ensure that it does not exceed the amount of reasonable cost recovery. [Fairness]

Assessment Outcome
Demonstrated

General Duty

FARPACTA, Part II, s.6
RHPA, Schedule 2, S.22.2

Transparency

- Maintaining openness
- Providing access to, monitoring, and updating registration information
- Communicating clearly with applicants about their status

Assessment Outcome

The OFC made two primary recommendations in the 2nd assessment cycle, both of which have been implemented.

The recommendations focused on two areas:

- registration policies should be organized and made available for committee and staff
- Information on the website about registration processes and policies should be improved

Since the last OFC assessment, the College has made significant improvements in transparency of registration processes.

Openness

- The redesigned website features clearly defined tabs about the examination and registration process, and associated policies.
- Registration policies implemented since the last assessment address special needs accommodation, examination appeal, missing documentation, and access to records.
- Policies and decision-making criteria are readily available to staff and registration committee members.
- Policies and criteria are reviewed and updated in response to changes in the regulatory environment. Input is sought from interested parties and applicants.
- Examination protocols for candidates are posted on the website.

Access

- The College take measures to ensure that applicants have all relevant information at the time and in the way needed to take actions appropriate to their individual circumstances. For example,
 - Allowing applicants to make statutory declarations should original documentation be unavailable
 - Accommodating applicants with disability in taking exams
- The College advises applicants of the progress of their application through written status updates, including application approval, examination results, and Registration Committee decisions regarding applications and requests for review.

Clarity

The College communicates effectively with applicants throughout the registration process. For example:

- Registration requirements and procedures are clearly described and explained on the website, including alternative ways in which registration requirements may be met.
- The College advises applicants of the progress of their application through written status updates.

Commendable Practice

Examination protocols for candidates are posted on the website.

Objectivity

- Designing criteria and procedures that are reliable and valid
- Monitoring and following up threats to validity and reliability

Assessment Outcome

The OFC made recommendations in the 2014 assessment in the following areas:

- Improve assessment guidelines for review of unaccredited denturists programs
- Develop guidelines and policies for decision makers to improve consistency of decisions

The College has implemented these recommendations.

The College uses a variety of methods to achieve objectivity in its assessment processes. These methods support a consistent approach to assessments, by promoting a shared understanding of policies, procedures and methodologies among college staff and the registration committee. This is evident from policy documents, examples of tools for decision-makers, and information posted on the College's website.

Reliability

To achieve consistent and reliable decisions, the College takes the following steps:

- provides annual training to all Committee members and staff involved in assessment processes
- established policies and procedures for both staff and committee members on key registration processes and requirements

Validity

- The College posts a qualifying examination blueprint on its website, identifying the competencies that are tested on the both the MCQ and the OSCE and the percentage of exam content that is linked to the six main competencies.

Commendable Practices

The College has established a policy that defines criteria by which trained denturists are selected to assess applicants in the OSCE qualifying exam.

Impartiality

- Identifying bias, monitoring, and taking corrective action
- Implementing strategies

Assessment Outcome

The OFC made three recommendations relating to impartiality,

- Improve training on identifying and mitigating sources of discrimination and bias in assessment and registration processes
- Demonstrate use of standardized templates for decision makers
- Illustrate topics covered in staff and committee training

All of these recommendations have been implemented.

The College demonstrates processes and procedures that are designed to reduce the potential for bias in assessment and decision-making processes.

Identification of Bias

- The College's annual training for council and committee members defines conflict of interest and its potential as a source of bias in relation to Committee roles and responsibilities.

Strategies

The College strategies to mitigate bias include:

- College staff have attended a course offered by the Ontario Regulators for Access Consortium, entitled 'Managing Cultural Differences'
- Committee members are required to declare potential conflicts prior to each Registration Committee meeting

- The College's annual training for Council and Committee explains what committee members are required to do should a conflict of interest arise
- Licensed denturists that are selected to act as assessors in the OSCE qualifying exam are required to disclose potential conflicts and sign a form attesting to fact.

Commendable Practices

Examination assessors are required to disclose potential conflicts and sign a form attesting to fact.

Fairness

- Ensuring substantive fairness
- Ensuring procedural fairness
- Ensuring relational fairness

Assessment Outcome

The College exhibits fairness in its registration practices, with evidence drawn from policies, annual reports, and FRP reports. The OFC made four recommendation related to fairness in the 2014 assessment, all of which have been implemented.

The recommendations focused on the following general areas of concern:

- Link registration requirements to entry-to-practice competencies
- Demonstrate that decision making processes adhere to College's policies and procedures
- Streamline documentation requirements if possible

Substantive Fairness

- In its 'Foundation Document for the Qualifying Examination', the College describes the development of a national competency profile, and the integration of the competencies within both the written and clinical components of the qualifying exam.
- Sample questions are posted on the website for the MCQ exam and the OSCE

Procedural Fairness

- The College has streamlined the documentation process by agreeing to accept documentation such as diplomas previously submitted to its third party agency for the purpose of credential authentication.

Relational Fairness

The College takes the following actions to promote relational fairness:

- has a process for taking applicants' circumstances into consideration
- Has comprehensive policies and procedures to provide accommodations to applicants.

Commendable Practice

Sample questions are posted on the website for the MCQ exam and the OSCE.

Background

Assessment Methods

Assessments are based on the [Registration Practices Assessment Guide: For Regulated Professions and Health Regulatory Colleges](#). The guide presents registration practices relating to the specific duties and general duty in the fair access legislation.

A regulatory body's practices can be measured against the fair access legislation's specific duties in a straightforward way. However, the general duty is broad, and the principles it mentions (transparency, objectivity, impartiality and fairness) are not defined in the legislation.

As a result, the specific-duty and general-duty obligations are assessed differently (see the [Strategy for Continuous Improvement of Registration Practices](#)).

Specific Duties

The OFC can clearly determine whether a regulatory body demonstrates the specific-duty practices in the assessment guide. Therefore, for each specific-duty practice, the OFC provides one of the following assessment outcomes:

- Demonstrated – all required elements of the practice are present or addressed
- Partially Demonstrated – some but not all required elements are present or addressed
- Not Demonstrated – none of the required elements are present or addressed
- Not Applicable – this practice does not apply to the CDO's registration practices

General Duty

Because there are many ways that a regulatory body can demonstrate that its practices, overall, are meeting the principles of the general duty, the OFC makes assessment *comments* for the general duty, rather than identifying assessment outcomes. For the same reason, assessment comments are made by principle, rather than by practice.

For information about the OFC's interpretations of the general-duty principles and the practices that the OFC uses as a guideline for assessment, see [the OFC's website](#).

Commendable Practices and Recommendations

Where applicable, the OFC identifies commendable practices or recommendations for improvement related to the specific duties and general duty.

Sources

Assessment outcomes, comments, and commendable practices and recommendations are based on information provided by the regulatory body. The OFC relies on the accuracy of this information to produce the assessment report. The OFC compiles registration information from sources such as the following:

- Fair Registration Practices Reports, audits, Entry-to-Practice Review Reports, annual meetings
- the regulatory body's:
 - website
 - policies, procedures, guidelines and related documentation templates for communication with applicants
 - regulations and bylaws
 - internal auditing and reporting mechanisms
 - third-party agreements and related monitoring or reporting documentation
 - qualifications assessments and related documentation
- targeted questions/requests for evidence that the regulatory body demonstrates a practice or principle

For more information about the assessment cycle, assessment process, and legislative obligations, see the [Strategy for Continuous Improvement](#).

References

1. ^ These includes: all practices from Information for Applicants, practice 3 from Internal Review and Appeals, practice 1 from Information on Appeal Rights, practice 1 from Documentation of Qualifications, practice 1 from Assessment of Qualifications, practice 2 from Access to Records, and practices 4-11 from Transparency of the Registration Practices Assessment Guide.
2. ^ Please note: Suggestions for continuous improvement appear only in the detailed report. Suggestions for improvement are not intended to be recommendations for action to demonstrate a practice, but are made solely to provide suggestions for areas that a regulatory body may consider improving in the future.