

College of DENTURISTS of Ontario

2023 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

Content

1. Background
 2. Organization information
 3. Registration requirements
 4. Third party assessments
 5. Accomplishments, risks and mitigations
 6. Changes to registration practices
 7. Membership and application data
 8. Changes Related to New Legislative and Regulatory Requirements
- Glossary of terms

1. Background

Under section 20 of the Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA), which is substantially similar to section 22.7(1) of Schedule 2 of the Regulated Health Professions Act, 1991 (RHPA),

“A regulated profession shall prepare a fair registration practices report annually or at such other times as the Fairness Commissioner may specify or at such times as may be specified in the regulations”.

Section 23 of FARPACTA and Section 22.9 of Schedule 2 of the RHPA then go on to indicate that the Fairness Commissioner shall specify the form in which these reports shall be prepared, along with the required filing dates. This section also stipulates that a regulator must make these reports public.

It is pursuant to these authorities that the Office of the Fairness Commissioner (OFC) has required that each regulator complete its 2023 Fair Registration Practices Report (FRP).

Please note that this report covers the time-period from January 1 to December 31, 2023.

The FRP:

- Collects information about the organization, applicants to the profession and current membership.
- Provides information to the public about how the organization has implemented fair registration practices during the reporting period.
- Helps the OFC to successfully undertake the education and compliance activities which include monitoring, applying a risk-informed compliance framework, assessing performance, and sharing best practices.
- Determines whether the regulator is complying with recently enacted legislative and regulatory provisions designed to reduce barriers for domestic labour mobility and internationally trained applicants.
- Identifies trends across regulated professions and regulated health colleges.

Please note that the 2023 version of the FRP has changed from the previous version in terms of both form and content as the OFC's enabling statutes have evolved and as the office migrates to a more permanent portal-enabled database solution.

2. Organization information

Organization name	College of DENTURISTS of Ontario
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3. Registration requirements

Applicants to the regulated professions and compulsory trades must fulfil registration requirements to practice their profession or use a professional title. This section summarizes registration requirements for each profession or trade regulated by College of DENTURISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Denturist
Academic requirement	The applicant must have a diploma in denture therapy or denturism from, i. George Brown College of Applied Arts and Technology, ii. any other institution that, in the opinion of the Registration Committee, issues an equivalent diploma or degree. (2) For the purposes of subparagraph ii of

	paragraph 1 of subsection (1), a diploma or degree is equivalent if it offers courses in the areas listed in the Schedule. O. Reg. 833/93, s. 1 (2).
Experience requirement	None, the College does not require prior experience.
Language requirement	The applicant must have reasonable fluency in either English or French. O. Reg. 833/93, s. 2; O. Reg. 281/23, s. 3.
Additional information on licensing requirements (may include links to appropriate page on regulator website):	The applicant must have successfully completed the qualifying examination in denturism set by the Council within 12 months of the application. The applicant must provide a Criminal Records and Judicial Matters Check. The applicant must be a Canadian citizen or a permanent resident of Canada or have an authorization under the Immigration and Refugee Protection Act (Canada) consistent with his or her proposed certificate of registration. O. Reg. 833/93, s. 1 (1); O. Reg. 404/94, s. 1 (1); O. Reg. 225/03, s. 1 (1); O. Reg. 23/12, s. 1 (1); O. Reg. 281/23, s. 2. This can be satisfied upon receipt of a notarized copy of a Canadian Passport, Birth Certificate, Permanent Residence Card, or Valid Work Permit. The applicant's past and present conduct affords reasonable grounds for belief that the applicant, i. is mentally competent to practise denturism, and ii. will practise denturism with decency, integrity and honesty and in accordance with the law. The applicant has not made, by commission or omission, any false or

	misleading representation or declaration on or in connection with an application. The applicant must deliver his or her original diploma in denture therapy or denturism and documentation identifying the applicant personally to the Registrar if the applicant did not receive a diploma in denture therapy or denturism from George Brown College of Applied Arts and Technology.

4. Third party assessments

Third party organizations that assess qualifications on behalf of the regulator.

Organization name	Function
World Education Services	Other

Fair access legislation requires regulators to take reasonable measures to ensure that any third parties undertake assessment of qualifications in a way that is transparent, objective, impartial and fair.

College of DENTURISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

World Education Services or equivalent organization (as recognized by the Alliance of Credential Evaluation Services of Canada as an approved assessment agency), are used by applicants of the College to authenticate their original academic credentials. The College does not use these third-party service providers to conduct the evaluation of academic credentials (it is conducted by the Registration Committee for equivalency purposes), but rather authenticate that the academic credentials submitted are genuine, its potential equivalency to a Canadian educational program, a potential copy of their diploma/degree that

was awarded, and the original language of teaching used during the program to determine language proficiency.

5. Accomplishments, risks and mitigations

Key accomplishments and risks pertaining to fair registration practices during the reporting period are summarized below.

A. Accomplishments

1	<p>Creation and deployment of the all new all online application process. The CDO has soft launched an all-new applicant portal in November 2023. Previously applicants submitted the required documentation electronically by email, postal mail, or courier. The all-new applicant portal digitizes all aspects of registration where the applicant can easily upload all required documentation in the applicant portal and complete any forms. The applicant portal also contains an all new graphic widget that displays the applicant's current registration stage, an explanation of their stage, what is required for that stage, and their progress towards licensure. This allows applicants to follow along their registration progress and anticipate what is required for the next stage. As well, a secure document management portal was created to allow applicants to scan or upload electronic documentation to support their applications. Prior to this, applicants had to mail or courier their documents to the College, now applicants can upload the required documents online at their convenience. The new online applicant portal is available as an option for new registrations in 2023 and first half of 2024 (with the paper based or electronic form based still available). The CDO will transition to the full use of the applicant portal by the second half of 2024.</p>
2	<p>Establishment of the Emergency Class of Registration. In order to operationalize the goals of the Government of Ontario and as ordered by the Chief of Nursing and Professional Practice, the CDO mobilized the whole of the organization to draft and create the Emergency Class of Registration in under 6 months. This included the drafting and consultation of the Registration Regulation, updating the College By-Laws including its consultation, establishment of a new class of fees, training of College Staff,</p>

and developing an online portal to apply for this Class of Registration. All in all, College Staff, College Legal Counsel, and Council worked diligently to establish this new Class of Registration that came into force on August 31, 2023.

B. Risks and Mitigations

Risk	Mitigation Measure
Electronic paper-based registration processes.	Brand new online applicant portal with document management system to facilitate upload of required documentation.
Availability of Registration Committee Members to review referrals to the Committee.	In 2023, the College began scheduling monthly meetings for the Registration Committee regardless of potential pending case files. Previously, the Committee would only meet ad hoc based on case files received. This allows greater certainty on meeting attendance and clarity of timelines for applicants.

6. Changes to registration practices

During the January 1 to December 31, 2023 reporting period, College of DENTURISTS of Ontario has introduced the following changes impacting its registration processes. Changes, anticipated impacts, and risk mitigation are summarized below.

A. Registration requirements and practices

Registration process	Changes Made (Yes / No)	Description
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Registration requirements either through regulation, by-law or policy	Yes	Introduction of Emergency Class of Registration with its own set of registration requirements including transfer requirements to Active General Class that is different from the Active General Class of Registration. Changes we enacted in the Registration Regulation with supporting fee structure in the By-Laws. There were no changes in policy.
New or consolidated class of certificates or licenses	Yes	Emergency Class of Registration
Assessment of qualifications, including competency-based assessments and examinations	No	
Documentation requirements for registration	No	
Timelines for registration, decisions and/or responses	No	
Registration and/or assessment fees	Yes	New class of fees for Emergency Class of Registration.
Changes to internal review or appeal process	No	
Access by applicants to their records	No	

B. Training, policy and applicant supports

Registration process	Changes Made (Yes / No)	Description
Training and resources for staff who deal with registration issues	Yes	College Staff are trained on the application process regarding the all new online applicant portal process and the application process for the Emergency Class of Registration.
Resources or training to support applicants to move through the licensing process	Yes	As part of the roll out of the all new applicant portal, the College provided a hybrid application process where applicants have a choice to use the all new applicant portal or the current electronic paper based application process. College Staff are trained to guide applicants on the new applicant portal and are on hand to support applicants by phone or email.
Anti-racism and inclusion-based policies and practices	Yes	The College embarked on an ambitious professional development plan for College Staff and Members of Council in 2023 logging over 140 hours of combined professional development activities. In 2023, the CDO along with Ontario's oral health regulators hosted an in-person joint Council and Staff workshop on indigenous peoples, reconciliation, and anti-bias workshop. The College in 2023 formulated its three-year 2023-2025 Strategic Plan making one of its key priorities to embrace DEI where the CDO commits to and embraces the principles of diversity, equity, and inclusion. As part of the Strategic Plan, the CDO will review its policies and practices to ensure inclusivity and to reduce any registration barriers.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	No	
Accreditation of educational programs	Yes	<p>The CDO since 2020 has embarked on the accreditation initiative to review and accredit all Denturism programs in Canada. In 2023, the majority of Denturism programs have received their initial accreditation status with one remaining program scheduled for their accreditation review in 2024. This would better facilitate inter-provincial labour mobility transfers and allow graduates from other provinces to begin their licensure journey in Ontario in a much quicker and efficient way as all Canadian programs are accredited nation wide. The CDO would continue to conduct academic assessments for internationally educated applicants. In 2023, the Superintendent of Private Career Colleges, in an effort to bolster support and resources for students of private career colleges, undertook work on a draft policy directive that would strengthen reporting requirements and transparency requirements for current or prospective students of private career college programs that have not yet undergo accreditation or will be reviewed shortly. The timely policy directive would strengthen accountability for private career colleges should the program ultimately be unsuccessful in its accreditation review. The CDO worked with the Ministry of Colleges and Universities along with staff from the Superintendent of</p>

		Private Career Colleges to assist with their development of the policy directive. The CDO reviewed the draft policy directive in depth and had opportunities to be consulted upon and provide feedback throughout the year. The policy directive was approved for implementation January 1, 2024, and the CDO continues to support the Office of the Superintendent of Private Career Colleges in our joint efforts to protect students and provide them with a smooth, efficient, and timely registration process. In 2024, the Superintendent will work with the CDO to develop an information sharing MOU to foster collaboration between the two organizations.
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	The College hosted two special council meetings and three council meetings to approve the establishment of an Emergency Class of Registration by drafting amendments to the Registration Regulation, completing the regulation submission template, conducting 60-day stakeholder and public consultation, amending the College By-Laws including amending its Registration Year End, conducting a 60-day stakeholder and public consultation on the by-law changes, updating the fee schedule for the Emergency Class, and working with the database provider to create an all new online application process for the emergency

		class. The Emergency Class of Registration came into effect August 31, 2023.
Technological or digital improvements	Yes	As noted earlier, the CDO launched in 2023 an all new all online applicant portal. Applicants can now conveniently apply for their Certificate of Registration, pay applicable fees, and upload required documentation all within the secure applicant portal. The portal has a built in widget that displays their current registration stage, information on the next stages, and allows applicants to follow along their licensure journey.
Steps to address labour shortages in the profession or trade	Yes	The College routinely meets with relevant stakeholders including denturism regulators from across Canada to discuss how it can play a role in addressing labour shortages and ensure there is proper distribution of Denturists across Canada to serve the needs of Canadians. As part of its routine meetings, the College held conversations with Denturism regulators from the atlantic provinces and northern territories to facilitate timely labour mobilities. For Denturists who wishes to practice in underserved communities in northern provinces or territories or who require good standing documentation for volunteer opportunities, the College waives any fees related to the issuance of good standing letters. As part of those discussions, there was agreement that moving from locally administered examinations to a multi-jurisdictional model would allow greater mobility in Canada as the examination results would be transferable between provinces and regulators. The College will continue its work on the multi-jurisdictional OSCE portion of the examinations.

Other	No	
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7. Membership and application data

The Office of the Fairness Commissioner collects membership and application data from regulators through annual Fair Registration Practices Reports, which are also made available to the public. Information is collected for the purpose of discerning statistical changes and trends related to a regulator’s membership, application volumes, licensure/certification results, and appeals year over year.

A. Race-based data collected

	Race-based data collected? (Yes or No)
Members	No
Applicants	No

Additional description:

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B. Other identity-based or demographic data collected

	Other identity-based or demographic data collected? (Yes or No)
Members	Yes
Applicants	Yes

Additional description:

The CDO collects data on gender and age.
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C. Languages of service provision

College of DENTURISTS of Ontario makes application materials and information available to applicants in the following languages.

Language	Yes / No
English	Yes
French	Yes
Other (please specify)	

D. Membership Profile

Profession Name	Total Number of Members
Denturist	773

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	773	18

Gender	Number of Members
Female	284
Male	488
X (includes trans, non-binary, and two-spirit people)	1

Jurisdiction of Initial Training	Number of Members
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Ontario	734
Other provinces and territories	21
Other International	18

Country of Initial Training	Number of Members
Egypt	1
Jordan	1
South Africa	2
China	1
Iran	1
Ukraine	1
Philippines	6
India	5
Canada	755

Official language of preference	Number of Members
English	773

Racial identity (optional)	Number of Members
Not collected	773

E. Data Notes

For language of preference, the College does not specifically collect this data. The College, however, collects whether they have the ability to professionally provide service in either official languages. French: 50 members, English 773 members.

F. Applicant Profile

Profession Name	Total Number of Applicants
Denturist	34

Gender	Number of Applicants
Female	21
Male	13

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	27	0
Other provinces and territories	3	0
Other International	4	0

Country of Initial Training	Number of Applicants
India	1
Philippines	1
South Africa	2
Canada	30

Official language of preference	Number of Members
English	34

Racial identity (optional)	Number of Members
Not collected	34

G. Data Notes

The College does not collect preference of official language but collects whether they can competently provide professional services in either official language.
French: 3, English 34

H. Application Decisions

The table below summarizes the outcome of registration decisions finalized in 2023. Some applications may have been received in the previous year.

Jurisdiction of initial training	Successful	Unsuccessful	Withdrawn
Ontario	27	0	0
Other provinces and territories	3	0	0
Other International	4	0	0

I. New Registrants

For the 2023 reporting year, the breakdown of new registrants by class of registration is provided below:

Class of registration	Total new registrants by class	Number of internationally educated registrants
Full / General/ Independent Practice	34	4

J. Data Notes

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K. Reviews and Appeals

Applicants for registration may appeal a registration decision. An **internal review or appeal** involves formal reconsideration of a registration decision further to an application and submissions by the applicant.

Jurisdiction of initial training	Number of internal reviews and appeals processed	Number of decisions changed following internal review or appeal
Ontario	2	0
Other International	1	0

An **external review or appeal** involves review of a registration decision by an external appeal tribunal or court, such as the Health Professions Review and Appeal Board or Divisional Court.

Jurisdiction of initial training	Number of applicants who sought external review or appeal	Number of decisions changed following external review or appeal
Ontario	0	0
Other International	0	0

Issues raised in reviews and appeals can point to challenges in the registration process. The table below summarizes top issues or reasons that applicants raised during these appeal proceedings.

Issue or reason raised	Number of appeals

Internationally trained applicants face additional challenges in the registration process. The table below summarizes top reasons for not registering internationally trained individuals.

Reason for not registering	Number of internationally trained applicants

L. Data Notes

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8. Changes Related to New Legislative and Regulatory Requirements

By Ontario law, regulated occupations must provide registration practices that are transparent, objective, impartial and fair. Non-health occupations are governed by the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006 (FARPACTA)*, while health professions are governed by the *Regulated Health Professions Act, 2011 (RHPA)*.

In 2021, both statutes were amended to incorporate substantive provisions to:

- A.** Eliminate the use of Canadian experience requirements except under prescribed circumstances.
- B.** Streamline language proficiency testing requirements.
- C.** Provide for the continuity of registration processes during emergency situations.
- D.** Set registration time limits. (FARPACTA only)

College of DENTURISTS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of DENTURISTS of Ontario has taken the following measures to comply with legislative requirements on eliminating Canadian experience requirements unless an exemption is granted or an alternative is identified that meets criteria prescribed in regulations (non-health regulators) or the exceptions in legislation are met (regulated health colleges).

B. Language Proficiency Testing

Change required: No changes required

College of DENTURISTS of Ontario has taken the following measures to comply with recent legislative changes requiring that regulators accept language proficiency testing results derived from any of the tests accepted for immigration purposes to satisfy their language proficiency requirements:

College of DENTURISTS of Ontario offers applicants the following options to demonstrate language proficiency.

- IELTS (General)

- CELPIP (General)
- TEF Canada
- TCF Canada
- Other language proficiency tests
- Success on a licensing exam or assessment
- Education in English or French
- Other (please specify) Alternative non-objective evidence pathway exists

C. Emergency Registration

Change required: Yes

College of DENTURISTS of Ontario has taken the following measures to comply with requirements to establish an emergency class (health colleges) or develop an emergency registration plan (non-health regulators).

The College hosted two special council meetings and three council meetings to approve the establishment of an Emergency Class of Registration by drafting amendments to the Registration Regulation, completing the regulation submission template, conducting 60-day stakeholder and public consultation, amending the College By-Laws including amending its Registration Year End, conducting a 60-day stakeholder and public consultation on the by-law changes, updating the fee schedule for the Emergency Class, and working with the database provider to create an all new online application process for the emergency class. The Emergency Class of Registration came into effect August 31, 2023.

Glossary of terms

Applicant: An individual who has applied for membership in a regulated profession or compulsory trade, with the associated rights to practice their profession / trade or use a professional title.

Domestic labour mobility: Applications subject to the Canadian Free Trade Agreement, which stipulates that a certificate issued by one province or territory should be recognized by all others unless there is an exception due to public health, safety and security reasons.

Internationally educated / trained: An individual whose initial professional education was not from a Canadian educational institution, or who is applying for trade certification based on experience gained outside Canada. This category includes individuals with education / training in the US and other countries. It also includes individuals who completed their initial professional education outside Canada and later addressed gaps with courses or a bridging program based in Canada.

Jurisdiction of initial training: For professions, the jurisdiction in which an applicant obtained their initial professional education used in full or partial fulfilment of registration requirements. For trades, the jurisdiction of initial trade experience listed on a Trades Equivalency Assessment (TEA) application.

Member: An individual who has satisfied the conditions for registration in their profession / trade and has been granted the right to practice and/or the right to use a professional designation or title. Members may hold a full license to engage in independent practice, or they may hold an alternate class of registration.

Racial identity: Voluntary self-report data of racial identity as a social description. Follows categories identified in the Ontario Anti-Racism Directorate Data <<https://www.ontario.ca/document/data-standards-identification-and-monitoring-systemic-racism>> .

Registration requirements: the entry-to-practice requirements that that an applicant must meet to be granted full membership in a regulated profession or trade, with the associated right to practice or right to use a professional title.

- **Academic requirement:** The formal education, or equivalent, that is required for licensing or certification in a particular regulated profession or trade.
- **Experience requirement:** The experiential training or work experience that is required for licensing or certification in a particular regulated profession or trade.
- **Language requirement:** The level of language proficiency that is required for licensing or certification in a particular regulated profession or trade, and the language proficiency tests accepted in fulfillment of this requirement.

Third party service provider: An external organization that assesses applicant qualifications on behalf of the regulator.