



COLLEGE OF DENTURISTS OF ONTARIO

November 25, 2014

Delivered via Email and Mail

Suzanne McGurn, Assistant Deputy Minister
Health Human Resources Strategy Division
Ministry of Health and Long-Term Care
900 Bay Street
Macdonald Block, 2nd Floor, Room M2-61
Toronto, ON M7A 1R3

Dear Ms. McGurn:

We are pleased to present you with the College of Denturists of Ontario's (CDO) response to the October 4, 2014 letter from the Honourable Dr. Eric Hoskins, Minister of Health and Long-Term Care and your letter of October 28, 2014.

Minister Hoskins, in his correspondence, requested that Colleges make transparency a priority objective and take concrete steps to develop and establish measures that will continuously increase transparency in our processes and decision-making, and that will make more information available to Ontarians.

The College of Denturists of Ontario acknowledges that transparency and accountability are the foundation of good governance. The CDO is committed to making transparency a priority objective so that we meet Ontarians' expectations that appropriate processes, procedures and decision making, within the health professions regulatory system are accountable and open, fair and transparent. The CDO takes the public protection mandated under the *Regulated Health Professions Act, 1991* very seriously and affirms its commitment to provide the public with timely, useful and clear information in an accessible manner not only to strengthen the public's confidence in self-regulation, but also so they can make informed decisions about their health care and health care provider.

The CDO recently participated in an in-depth assessment of how it registers individuals who apply for a certificate of registration to practise denturism in Ontario. With the above foundation in mind, the CDO takes to heart the recommendations from the OFC to ensure that our registration practices are transparent, objective, impartial, and fair. To this end, a number of policies dealing with entry-to practice matters will be brought to Council in December 2014. These policies will assist applicants not only to understand what expectations they can have of the CDO in dealing with their applications, but

also for applicants to be able to ascertain clearly what the requirements for entry-to-practice are. Furthermore, training for staff and decision makers is on-going to ensure that applicants are treated fairly in accordance with the principles enunciated above. The CDO is also currently updating its registration guide to make it more reader-friendly and understandable; the new and improved registration guide will be completed by spring of 2015 and it will be posted on our website for easy access. The CDO also makes public its annual OFC's Fair Registration Report on the website.

In September 2013, the CDO Council approved the "National Competency Profile for Denturists". This document lays out the competencies (knowledge, skill, judgment and abilities) required for effective, ethical and safe patient care at an entry-to-practice level. The CDO, together with the denturism regulatory bodies in Alberta and British Columbia, was instrumental in developing the profile. And in December 2013, Council approved the creation and administration of a new valid, objective, fair and defensible licensure (qualifying) examination based on the competency profile; successful completion of the qualifying examination is one of the requirements applicants must meet when applying for a certificate of registration. Both the national competency profile for denturists and the qualifying examination foundation documents are posted on the CDO's website so that qualifying examination candidates are able to ascertain what entry-to practice competencies they are being assessed on and how they are assessed.

At the October 2014 Council meeting, Council endorsed a comprehensive review of all of its documents currently accessible via the CDO's website. This project is being undertaken in an effort to update and revise where applicable, all policies, standards of practice, guidelines, and other key resources which are all accessible to the public and members. Many of the CDO's documents have not been reviewed for transparency, clarity, completeness, accuracy and relevance for some time, and the Minister's directive reinforces that this is an important initiative in the public interest for us. While continuous improvement is ongoing, we anticipate having the majority of the document review project completed by fall 2015/winter 2016.

Hand-in-hand with the CDO's document review project, we are committed to a complete overhaul of our website with the foreseeable outcome that makes it easier to navigate, more user-friendly and more informative regardless of whether you are a member of the public, an applicant or a member searching for information. The CDO endeavours to post on its website a substantial amount of information for the public and its members such as notices about Council activities prior to and after meetings, a guide to the complaints and discipline process, information about our quality assurance program, annual reports, and an update and notice section which includes directives from the Ministry of Health and Long-Term Care among other items. CDO staff also provide telephone support to the public and members who are not comfortable using the Internet or who may not have access to a computer. The anticipated timeframe for completion of the new website is fall 2015.

The multi-phased transparency project undertaken by the Advisory Group for Regulatory Excellence (AGRE) is a significant and important milestone in the long history of self-regulation and its commitment to share its work regarding this initiative within the Federation of Health Regulatory Colleges of Ontario (of which the CDO is a member) is commendable. The CDO is heartened by the fact that the Ministry of Health and Long Term-Care encourages us to build on the work undertaken

by AGRE and to consider the developed decision framework when applying transparency principles in the examination of our information-sharing practices and in the determination of how we might make more member-specific information regarding decisions and processes available to the public. The CDO recognizes that transparency is a significant regulatory issue and Council received an overview of the AGRE's transparency principles at its March 2014 meeting. Going forward, the CDO's Executive Committee will recommend that Council adopt the transparency principles at the December 2014 Council meeting. The transparency principles will be used as an integral part of the CDO's decision making framework as it examines all of its regulatory and communications processes to ensure that necessary and appropriate information is provided to the public in an accessible manner as well as determining what information remains confidential, and the corresponding rationale for not making it public.

Upon adoption of the transparency principles, the Council will review the two recommended phases that have been put forth by AGRE, commencing with phase one of the transparency initiatives which focuses primarily on enhancing clarity and consistency of existing information on the public register in addition to noting any other information that is already publicly available and which may be relevant to a member's suitability to practise denturism.

The CDO's bylaws already have a provision (in section 33.06) whereby, "the register shall contain information, which is designated as public information" regarding each member in addition to what is laid out in the Code. As an example, our bylaws set out that matters which have been referred to discipline are to be noted including the date of the referral; a summary of each specified allegation; and any hearing dates-all of this information is posted on our website.

Additional information to be displayed on the public register not contemplated in our bylaws would require amendments to them with the applicable timeframe for stakeholder consultation. The CDO's Executive Committee will make recommendations in accordance with phase one of the AGRE project, regarding any proposed changes to the public register and corresponding changes to the bylaws for Council's consideration at its March 2015 meeting, followed by a sixty-day consultation period with stakeholders. Depending on the outcome of those consultations, the proposed phase one information on the public register could be finalized by fall 2015. Once approved by Council, the information available on the public register will be expanded in accordance with the amended bylaws.

AGRE's phase two of the transparency initiatives will focus on the information to the public relating to information disclosure and the disposition outcomes of the CDO's Inquiries, Complaints and Reports Committee's investigations and meetings. Considerable discussion with the Inquires, Complaints and Reports Committee, Council, legal analysis, and review of internal process changes will need to occur as well as allotting time to seek bylaw changes in addition to notification to members who may be affected by the expansion of said information on the public register. The CDO will set spring 2016 as a target date by which to have completed much of the work envisioned in AGRE's phase two of the transparency initiatives.

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In summary, the CDO recognizes that access to more information will assist Ontarians in making an informed decision about their health care providers. Together with the CDO staff, Council reaffirms its commitment to its public protection mandate under the *Regulated Health Professions Act, 1991* and will continue down the path of continuous improvement in all aspects of its regulatory operations in order that broader transparency and accountability are at the core of its public interest mandate and to keep the public's trust in self-regulation.

The CDO, furthermore, affirms that it will work collaboratively with the other health regulatory colleges and transitional councils to ensure that the public is better informed, and as part of this commitment, the CDO will post the Minister's letter and our response on the website under a new Transparency Initiatives tab.

If you have any questions or would like further information, please do not hesitate to contact Abena Buahene, Registrar

Sincerely,



Anita Kiriakou
President & Public Member



Abena Buahene, BA. LLB
Registrar & CEO

c. The Honourable Minister Dr. Eric Hoskins, Ministry of Health and Long-Term Care