



Ontario's Regulated Professions:

REPORT ON THE 2007 STUDY OF REGISTRATION PRACTICES



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The Office of the Fairness Commissioner is an arm's-length agency of the Ontario government, established under the Fair Access to Regulated Professions Act, 2006. Its mandate is to ensure that certain regulated professions have registration practices that are transparent, objective, impartial and fair.

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MESSAGE FROM THE FAIRNESS COMMISSIONER



I am pleased to present *Ontario's Regulated Professions: Report on the 2007 Study of Registration Practices*.

The report provides a summary of 34 individual studies of registration and licensing practices in Ontario's regulated professions. It provides findings, points out issues for further investigation, and presents registration statistics that are unavailable elsewhere.

This report and the 34 studies are the result of research and of consultations with the professions, conducted by the Office of the Fairness Commissioner (OFC). The results set the foundation for improved access to the professions in Ontario, providing a baseline the OFC can use to measure future progress in fulfilling the promise of the Fair Access to Regulated Professions Act, 2006 (FARPA) and the amendments to the Regulated Health Professions Act, 1991 (RHPA).

Individual studies are available at www.fairnesscommissioner.ca.

I invite you to read this report and the individual studies for the professions that interest you.

Sincerely,

A handwritten signature in black ink, appearing to be 'JA', written over a light grey background.

Hon. Jean Augustine, PC
Fairness Commissioner

INTRODUCTION

About this Report

This report is a summary analysis of information and findings about the 2007 registration practices for 34 of Ontario's regulated professions, based on individual studies by the Office of the Fairness Commissioner (OFC).

Reports about individual professions are posted on the OFC's website. They give an overview of each profession's application process, registration requirements, and review and appeal mechanisms—as well as supports such as bridging programs and mutual recognition agreements. The individual reports provide baseline data that the OFC can use to help ensure that registration practices are transparent, objective, impartial and fair.

Background

Over the past two decades in Ontario, the government, regulated professions, post-secondary institutions, community organizations and others have worked together to identify and remove barriers that could slow or restrict registration in the province's regulated professions.

In the late 1980s, the Task Force on Access to the Professions and Trades in Ontario looked into the requirements for entry to Ontario's professions. It found that few professions were free of discriminatory practices, and that broad, structural solutions were necessary to remedy systemic barriers.

In its 1989 report, the task force wrote that such solutions were “win-win” for the professions and for applicants to those professions. It pointed out that, in coming years, the growing number of immigrants would be increasingly important to the health of Ontario's economy.

In the fall of 2004, the Ministry of Training, Colleges and Universities (MTCU) conducted its *Survey of Occupational Regulatory Bodies*. This survey was the basis for MTCU's first annual report on the subject: *Opening Doors: An Investment in Prosperity—Welcoming Internationally Trained Individuals into Ontario's Workforce, A Progress Report, January 2005*. The report highlighted the benefits and challenges of integrating internationally trained professionals into Ontario's workforce.

Also in the fall of 2004, Judge George M. Thomson reviewed appeal processes within Ontario's regulated professions. His 2005 report, *Review of Appeal Processes from Registration Decisions in Ontario's Regulated Professions*, stated the following:

“During the Appeals Review, we were struck by the number of measures that are needed to improve access for qualified internationally educated applicants—such as access to training, work experience, and supports—which cannot be addressed within the mandate of this review.” (p. 12)

In 2006, the Ministry of Citizenship and Immigration (MCI) produced *Opening Doors: Investing in Prosperity: An Update on the Integration of the Internationally Trained into Ontario's Workforce* (September 2006). It focused on the continuing discussions among the regulated professions, employers, community groups and educators seeking solutions to help international professionals. The report profiled the top 10 professions in which internationally trained newcomers intended to work.

Collectively, these reports provided the most comprehensive compilation of qualitative and quantitative data on the subject at that time. They highlighted the efforts that had been made to improve the registration

processes, training programs, access to information, mobility, and other factors affecting the registration of professionals. A central recommendation of the Thomson Report called for the establishment of a Fair Registration Practices Code that would set out basic registration process guidelines for all regulators.

In June 2006, the Ontario government introduced the Fair Access to Regulated Professions Act (FARPA), to provide oversight to ensure that registration practices are transparent, objective, impartial and fair, and that responses to individuals are timely. FARPA came into effect on March 1, 2007.

In addition, FARPA amended the Regulated Health Professions Act, 1991 (RHPA), which is the law related to health professions. The Health Professions Procedural Code (HPPC) now requires registration that is “transparent, objective, impartial and fair.”

FARPA has three main parts:

- It sets out the Fair Registration Practices Code.
- It establishes the Office of the Fairness Commissioner (OFC).
- It creates an access centre for internationally trained individuals, called Global Experience Ontario.

The OFC requires the bodies that regulate the professions, sometimes called colleges, to review their own registration processes, submit reports about them, and undergo compliance audits. These audits will allow the OFC to ensure that they are meeting their obligations under FARPA or the RHPA.

The OFC has no mandate to advocate or intervene on behalf of individuals or to assess credentials. It works with the regulated professions to make sure everyone gets fair treatment.

Currently, FARPA covers 14 non-health professions, and the RHPA covers 21 health professions. (See Figure 1 for a list of professions.)¹

Timeline	
1989	Report of the Task Force on Access to the Professions and Trades in Ontario.
1991	Regulated Health Professions Act (RHPA).
2004	Survey of Occupational Regulatory Bodies (MTCU).
2005	<i>Opening Doors, An Investment in Prosperity: Welcoming Internationally Trained Individuals into Ontario's Workforce, A Progress Report.</i> <i>Review of Appeal Processes from Registration Decisions in Ontario's Regulated Professions</i> (Thomson Report).
2006	<i>Opening Doors, Investing in Prosperity: An Update on the Integration of the Internationally Trained into Ontario's Workforce.</i> Fair Access to Regulated Professions Act (FARPA), plus amendments to RHPA.
2007	Office of the Fairness Commission (OFC) established. OFC Study of Registration Practices started.

¹ The OFC's responsibilities under FARPA cover 35 regulated professions, including the College of Early Childhood Educators. Because that college does not yet exist, the OFC has not conducted a study of its registration practices. The college is therefore not included in Figure 1, and is not considered in this report.

Figure 1 – Professions Regulated by FARPA and RHPA

Regulator	FARPA	RHPA
Association of Ontario Land Surveyors	•	
Association of Professional Engineers of Ontario	•	
Association of Professional Geoscientists of Ontario	•	
Certified General Accountants Association of Ontario	•	
College of Audiologists and Speech-Language Pathologists of Ontario		•
College of Chiropractors of Ontario		•
College of Chiropractors of Ontario		•
College of Dental Hygienists of Ontario		•
College of Dental Technologists of Ontario		•
College of Denturists of Ontario		•
College of Dietitians of Ontario		•
College of Massage Therapists of Ontario		•
College of Medical Laboratory Technologists of Ontario		•
College of Medical Radiation Technologists of Ontario		•
College of Midwives of Ontario		•
College of Nurses of Ontario		•
College of Occupational Therapists of Ontario		•
College of Opticians of Ontario		•
College of Optometrists of Ontario		•
College of Pharmacists of Ontario		•
College of Physicians and Surgeons of Ontario		•
College of Physiotherapists of Ontario		•
College of Psychologists of Ontario		•
College of Respiratory Therapists of Ontario		•
College of Veterinarians of Ontario	•	
Institute of Chartered Accountants of Ontario	•	
Law Society of Upper Canada	•	
Ontario Association of Architects	•	
Ontario Association of Certified Engineering Technicians and Technologists	•	
Ontario College of Social Workers and Social Service Workers	•	
Ontario College of Teachers	•	
Ontario Professional Foresters Association	•	
Royal College of Dental Surgeons of Ontario		•
Society of Management Accountants of Ontario	•	

Methodology for the Study

The OFC researched and analyzed previous surveys, reports and legislation on the registration practices of the 34 regulated professions under review. It then gathered current information from face-to-face meetings with staff from the regulatory bodies, the websites of the regulatory bodies and third parties, and career maps of the regulated professions on the website of the Ministry of Citizenship and Immigration (if applicable), as well as statistical information provided by the regulatory bodies. The OFC synthesized this information and validated its findings with the regulatory bodies. It then compiled a separate report for each profession, called "Study of Registration Practices," summarizing the profession's registration practices on December 31, 2007.

The OFC study captured the following content for each profession:

- labour market and economic trends
- new developments in the profession
- staffing
- registration requirements and application process
- documentation required from internationally trained applicants
- credential assessment (third party and/or internal)
- academic/program requirements
- work experience requirements
- examinations
- language requirements
- fees
- third parties
- typical length of the registration process
- accredited programs
- internal review/appeal process
- bridging programs
- mutual recognition agreements
- applicants' interactions with the regulatory body, including:
 - nature and frequency of communication between the regulatory body and applicants
 - backlogs
 - complaints regarding the registration process
- changes since the 2005 survey conducted by the Ministry of Citizenship and Immigration to collect information about regulatory bodies in Ontario
- registration statistics.

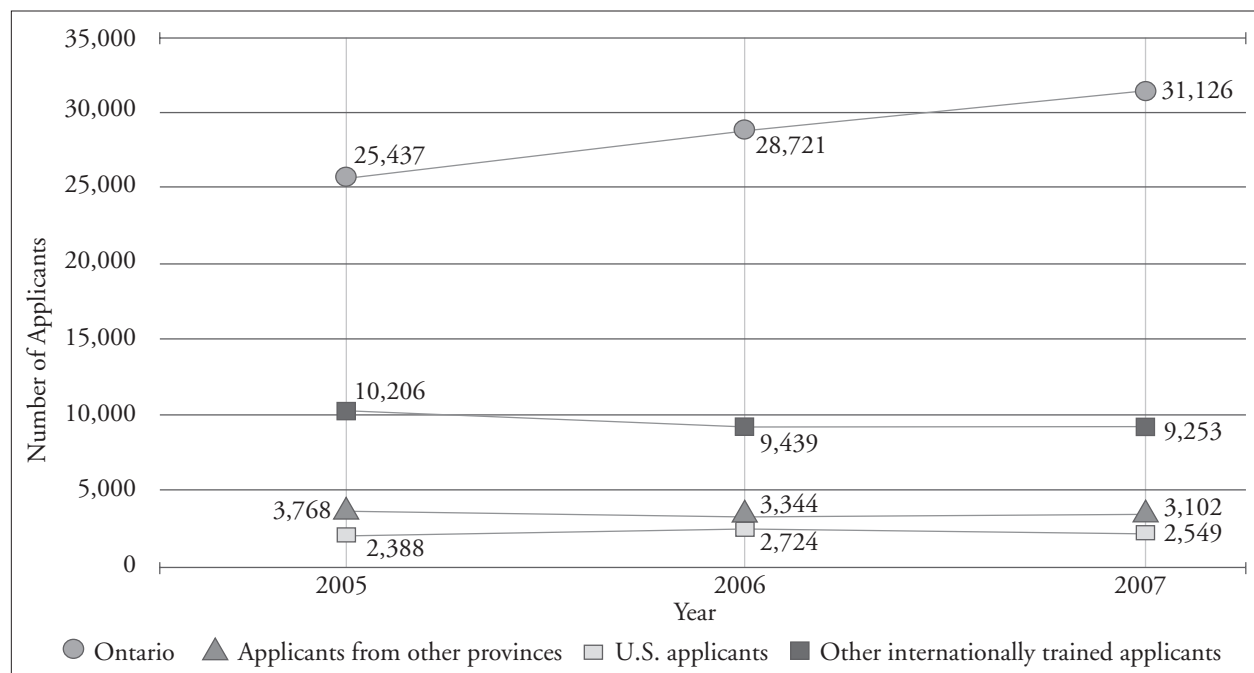
SUMMARY OF FINDINGS

Initial analysis of registration practices suggests that the regulated professions are moving towards transparent, objective, impartial and fair registration practices that will help applicants from other provinces and countries who wish to become registered to practise a profession in Ontario. Not all of the regulated professions are moving at the same pace, and some deeply rooted systemic registration issues will take time to resolve; however, overall there is a willingness among the regulated professions and other stakeholders to work with the OFC towards compliance with the legislation.

This section summarizes the findings of OFC's research into individual professions, and reports these findings using topic headings used in the individual reports. Where applicable, each topic includes issues for further investigation.

The overall number of new applicants to Ontario's regulated professions increased from 42,005 in 2005 to 44,414 in 2006 and 47,068 in 2007 (see Figure 2). However, over the same period, there was an overall decline in the number of applications from internationally trained individuals. Coinciding with that decline, the number of individuals immigrating to Ontario decreased from 140,524 to 125,914.

Figure 2 – New Applications to Ontario's Regulated Professions by Year, 2005–2007



The numbers in this figure do not include applicants whose original training location is unknown.

Many factors may be leading to these trends, including greater opportunities in other provinces or countries or the ability to work in the profession without being registered. Or perhaps individuals have simply given up trying to register in a regulated profession in Ontario.

It is important to note that the decline did not occur in all professions. For example, although there were fluctuations over these years, there were overall increases in the number of internationally trained applicants for four of Ontario's regulated professions: nurses, physicians and surgeons, certified management accountants, and dietitians.

Labour market conditions for the professions vary greatly. Some professions are concerned about aging membership and insufficient enrolment in academic programs to replenish the membership numbers, while others report an oversupply of members who cannot find work in their profession. And some do not collect data about employment or labour market conditions.

Once internationally trained individuals complete their registration requirements, they face the sometimes daunting task of finding employment. Several professions said that registration in their profession does not always translate into employment for internationally trained individuals. Economic and labour market trends affect the ability of employers to absorb the flow of newly registered professionals.

It is important to seek input from employers about their hiring practices, concerns and needs. If Ontario is to keep its internationally trained professionals, it may need to educate employers about the importance of highly skilled people to the province's future economy.

Closer examination is needed of the potential reasons for the decline in the number of internationally trained applicants, and the difficulties newly registered internationally trained individuals have in finding work in their profession.

The OFC will work to connect stakeholders and reach out to employers to address these issues.

Registration Practices

Registration Requirements and Application Process

Ontario's regulated professions have similar mandates for registering qualified applicants.

However, although there are common themes for academic and work-experience requirements—such as hours of instruction, accreditation status, clinical experience, years of professional work and mentorship—practices vary considerably. There may be no additional educational requirements beyond a professional degree, or applicants may be expected to take additional instruction at their own expense. Applicants may also have to meet other requirements such as proof of good character, legal status to work in Canada, and proof of liability insurance that must be carried by members of the profession.

There may even be differences in how individuals are registered or certified to practise as an independent professional. Some regulatory bodies issue certificates, and some issue licences. Some do both, depending on a particular specialty. And some issue alternative classes of licences or certificates, which allow the individual to practise, but with limitations.

The College of Physicians and Surgeons (CPSO) reported that 3,279 applicants became members of the profession in 2007. However, 2,190 of these applicants were issued one of the five alternative classes of licence CPSO provides besides Independent Practice.² Each of these alternative classes limits the type and duration of work the individual may perform. Therefore, only 1,089 new members of CPSO can work in an unrestricted, independent practice in Ontario.

The OFC will continue to explore this issue to understand the assessment and selection processes at play in the certification of physicians.

Highly skilled, internationally trained professionals are sometimes invited to teach as subject-matter experts in Ontario's post-secondary institutions. Because of their expertise and experience, they may have been granted an alternative class of licence. In some cases they have taught and practised their profession for many years and are training individuals who eventually receive their professional registration. Yet they cannot register and independently practise their profession in the province.

It would be prudent for the Ministry of Health and Long-Term Care and other organizations to investigate fast-track solutions for individuals in this situation.

Defining the term "applicant"

To understand when a professional enters the registration process, the OFC asked the regulatory bodies to define the term "applicant" for their registration process. Overall, the definitions vary greatly. In some professions, people are considered applicants as soon as they make contact with the profession; in others, people must first submit a registration form and perhaps the registration fee; and in a few professions, a third-party assessment of credentials is required before the person can apply.

² Following are the five alternative classes of licence:

Postgraduate Education—may practise only as required by the postgraduate training programs; certificate expires when the enrolment in post-medical education ceases.

Restricted—must practise in accordance with specified conditions and limitations on the certificate.

Academic Practice—may practise only in a medical school department while holding an academic appointment; certificate expires when academic appointment ends.

Short Duration—may practise only to the extent required by the appointment at a public hospital, psychiatric facility or medical school; certificate valid for up to thirty days.

Academic Visitor—may practise only in a medical school department while holding an academic appointment; certificate may be issued for up to fifteen months only.

Documentation Required

Document requirements for each regulated profession vary considerably. For instance, one profession may simply require official transcripts and reference letters, while another requires elements such as proof of legal status to work in Canada, references, official transcripts, documentation of previous work experience, and a resumé.

Some professions have provisions for those cases where an applicant's documentation cannot be obtained or has been destroyed (e.g., as a result of violent conflicts in the applicant's home country). These provisions include acceptance of signed undertakings; notarized declarations or sworn affidavits detailing the applicant's education and experience; references from former instructors, colleagues or supervisors; and the possibility of applicants participating in challenge exams,³ prior learning assessment reviews⁴ or registration committee interviews.

Other professions stated that they had rarely, if ever, had an applicant who could not provide documentation, and that if any such situation arose, they would handle it on a case-by-case basis. Where a profession relies on a third party for credential assessment, the profession may direct an applicant to deal directly with the third party regarding this issue.

Some professions have created databases of international institutions that offer training in their field and the syllabuses, programs, degrees and transcripts the institutions offer, which the profession can use to verify an applicant's qualifications.

Credential Assessment (Third Party and/or Internal)

The assessment of an applicant's credentials is done by the regulated profession alone, or in combination with a third party, or by a third party alone. Assessments are the first step in determining whether an applicant has the necessary academic qualifications and experience and/or competencies to be registered in the profession.

Professions that conduct their own assessments refer applications to their licensing and registration staff. For many of these professions, applications that do not meet the registration requirements are referred to a registration committee for further review.

For many professions, agencies that assess the qualifications of internationally trained professionals (often called qualification-assessment agencies or "third parties") play a key role in the registration process. They may provide degree-equivalency assessments,⁵ occupation-specific credential assessments and competency and prior learning assessments, and may conduct examinations. Because regulatory bodies rely on these assessments to make registration decisions, the agencies' work affects individuals' access to the regulated professions.

Twenty-seven (17 health and 10 non-health) professions use third-party agencies to assess applicants' credentials (see Appendices A and B), particularly those of internationally trained applicants. Where a regulated profession relies entirely on a third party to assess an applicant's credentials, the regulated profession may only see the applicant if he or she has received a favourable assessment by the third party.

³ A challenge exam assesses an applicant's prior learning (previous education and experience) through a variety of written and non-written assessment tools, including examinations and demonstrations, that have been developed by experts on the subject (e.g., university faculty in the discipline involved).

⁴ That is, the identification and measurement of skills and knowledge acquired outside formal educational institutions (e.g., through work or other life experiences). Prior learning assessments are most often used to grant academic credit or to determine eligibility to practise a trade or profession. The assessments may also involve a determination of the individual's future goals and training needs.

⁵ That is, the comparability of the applicant's education in the professional discipline with that obtained by an applicant studying the same discipline at a Canadian institution.

Under FARPA and the HPPC, regulated professions must take reasonable measures to ensure that third parties assessing qualifications do so in a way that is transparent, objective, impartial and fair.

Some professions are moving toward a competency-based framework for assessing qualifications. Additionally, some are implementing prior learning assessments, a “holistic” approach that incorporates academic, competency-based and practical-experience requirements. Some professions see this method as more efficient than other methods at identifying gaps and accelerating the registration process for applicants.

Academic/Program Requirements

The regulated professions generally require that an individual applying for registration have a specific degree, or its equivalent if the individual attended a non-accredited institution. The degrees required vary from undergraduate diplomas and masters degrees to other profession-related advanced degrees. Professions may have additional non-academic program requirements.

There is a trend of Ontarians going overseas to complete their professional education with the intention of returning to Canada to work in their profession. Some do this because there are insufficient spaces in academic programs in Ontario. Apparently many believe that, as returning Canadian citizens, they will not face the same registration requirements as other internationally educated applicants or even that they will be placed at the head of the queue. On returning they find out that this is incorrect.

The OFC will study this issue further to determine the scope of the problem and how domestic and foreign post-secondary institutions and Ontario's regulatory bodies are addressing it.

For some professions, the necessary programs and courses may be offered in only one location in Ontario or Canada. The applicant must apply to that school, which may have a limited number of spaces, and, if accepted, must move to that location.

The regulatory bodies and post-secondary institutions need to explore other alternatives, such as more flexible, modular course offerings and distance-learning.

Many post-secondary institutions do not have enough places available for internationally trained individuals who wish to enrol in required courses or programs to eliminate gaps in their qualifications.

Regulated professions must work closely with the education sector to find solutions, because academic requirements are critical components of the registration process.

Internationally trained individuals may turn to fast-track programs offered by private educational institutions that advertise a less difficult path to registration. Unfortunately, these programs may not meet the requirements of the profession. If students do not understand these limitations when they enrol, they may have to spend additional time and resources to meet the profession's requirements.

As mentioned earlier, some professions may have other types of program requirements that may also create barriers for applicants, especially those from other countries. For example, applicants to the College of Physicians and Surgeons of Ontario must perform a medical residency where they practise under supervision, but there may not be enough spaces. The allocation of spaces is a complex process involving multiple steps with input from multiple organizations: the provincial government, not-for-profit assessment and matching programs, and faculties of medicine.

These organizations must be prepared to make difficult decisions about the number of spaces that go to domestic applicants and the number that go to international applicants, and about the process for assessing and selecting applicants to fill those spaces, to ensure that qualified internationally trained professionals stay in Ontario.

Work Experience Requirements

Most of the regulated professions have some type of work experience requirement as a part of their registration process. Those professions that do not may require the applicant to participate in clinical clerkships, supervised practice experience and internship or mentorship.

Documented previous work experience is acceptable in some professions, while others require applicants to provide proof of “Canadian experience” or to work under the supervision of a mentor in Canada for a set amount of time. Canadian experience can mean experience in Canada or experience working abroad under the supervision of a professional registered in the profession in Ontario. The purpose of this requirement is to show proof of necessary knowledge of, for example, Ontario law, codes and standards, and unique environments.

“Canadian experience” can be challenging for internationally trained individuals. It is difficult for potential applicants—who may have no problem satisfying academic requirements—to find work without Canadian experience, yet the regulator requires Canadian experience to complete the registration process. The applicant must either immigrate to Ontario with no guarantee of registration, or find a Canadian employer overseas, not necessarily in his or her home country. The applicant may not have workplace connections, and available opportunities may not meet the regulatory body’s requirements for work experience.

The OFC will work with regulated professions to review their Canadian experience requirements and will engage employers in this issue.

Examinations

Regulatory bodies administer exams themselves, use third parties to administer them, or use a combination of both. For example, the College of Veterinarians of Ontario (CVO) requires applicants to write the National Examining Board examinations, which are administered by the board. However, the CVO also requires applicants to take the Ontario Provincial Qualifying Exam, which is administered by the CVO.

Thirty regulated professions require applicants to take at least one examination as part of the registration or qualifying process (see Appendices A and B). The number and the nature of the exams differ between professions. For example, some exams focus on testing an applicant's knowledge, while others test for skills and competencies. Most professions allow an applicant who fails an exam to take it again.

One regulatory body, the College of Denturists of Ontario, reported that it has examination processes that ensure there can be no biases based on the applicant's country of origin, race, ethnicity, name or any other identifying feature. The college has an objectively-based clinical examination, administered by one group and evaluated by a different one. Candidates are assigned a number that they use during the exam and that is used when the exam is being graded, so the test results remain anonymous during the grading process.

The format (such as multiple choice or clinical exams) and costs of required examinations can be an obstacle to registration.

If an internationally trained applicant has established a professional career in his or her field over many years and is required by a registration committee to take additional qualifying exams, the exams are a time-consuming and costly burden.

Regulated professions must continue to find ways to address these potential barriers.

Language Requirements

Many internationally trained individuals face language-related barriers to registration in Ontario.

While 22 of the 34 regulated professions require an applicant to be proficient in English or French (see Appendices A and B), they differ in how proficiency is proven. For example, the bodies may ask that the applicant be "reasonably fluent" in the language, and "reasonable fluency" may not be defined. Some other professions require applicants who come from a country where English or French is not an official language to take an English or French proficiency test, such as the Test of English as a Foreign Language (TOEFL), while still others have a language proficiency section in one of their examinations. Other professions simply assume that applicants are proficient if they were successfully able to navigate through the registration process.

Fees

Fees vary in number and amount based on factors such as the size of the regulatory body, types of licences or certificates, and number of required exams.

All professions provide information about application and registration fees on their websites.

They expressed concern that the FARPA and HPPC requirements for audits will likely result in an increase in membership fees and other fees.

Third Parties

For most professions, third-party agencies that assess the qualifications of internationally trained professionals play a key role in the registration process. For example, different third parties may provide degree-equivalency assessments,⁶ occupation-specific credential assessments, and competency and prior learning assessments, and may conduct examinations.

The OFC is administering a comprehensive questionnaire to begin a study of third-party assessment practices.

For a list of third parties used by the regulated professions, see Appendix C.

For more information about assessment, see “Credential Assessment” earlier in this section of the report.

Typical Length of the Registration Process

The typical length of time it takes for an individual to be registered in a profession, from the time he or she applies, differs for each profession according to requirements that must be met at each stage. Most regulated professions said that obtaining all of the documentation to complete the application is the most time-consuming part of the process. It is also one of the more difficult requirements for internationally trained individuals to meet, because the documentation must be obtained from institutions and employers outside of Canada. For more information on registration time-frames, see Appendices A and B.

Internal Review/Appeal Process

All but one of the non-health professions handle reviews internally, through their registrar and a registration committee. Some also have an appeals committee or similar body. In some instances where decisions are based on third-party assessments, the applicant must deal directly with the assessment agency. For example, the Law Society of Upper Canada requires applicants to deal directly with the National Committee on Accreditation (NCA) regarding reviews and appeals of assessments conducted by the NCA.

Under the HPPC, the health professions have a standard internal review and appeals process. Each regulatory body must have a registration committee that reviews decisions by the registrar that are unfavourable to applicants, and applicants can appeal decisions to the Health Professions Appeal and Review Board (HPARB). The regulatory bodies must also inform applicants about the internal review and appeals processes when a negative registration decision has been made.

Some professions post information about the internal review and appeals processes on their website and in written material. For example, the Ontario College of Social Workers and Social Service Workers provides information about its Registration Appeals Committee on its website under the Prospective Members section. However, on some professions' websites, information about internal reviews and appeals is not easy to find.

⁶ That is, the comparability of the applicant's education in the professional discipline with that obtained by a Canadian-educated applicant studying the same discipline.

Regulatory bodies that conduct internal qualification assessments, reviews and appeals must ensure that the staff involved are properly trained. All the professions that conduct internal review and appeals processes provide some level of training or orientation. For example, new staff in the College of Physicians and Surgeons' credential assessment group have one year of training before they can conduct assessments independently.

For all of the regulated professions, the review/appeal bodies are independent of those making assessment and registration decisions.

All regulated professions reported that applicants have access to all records related to their application, except personal references that were submitted as part of the application. (FARPA also specifies limitations on access to records in section 12(2), and the RHPA in section 16(2).)

Bridging Programs

Bridging programs can help internationally trained professionals eliminate gaps in their academic and work experience. These programs vary in scope: some are offered in partnerships between the regulated profession (not all professions participate in the bridging program for their profession) and post-secondary institutions or community agencies.

Currently, ten health and eight non-health professions offer bridging programs (see Appendices A and B). They receive start-up funding from the Ontario government and, in some instances, the federal government, but are expected to become self-sustaining. However, very few of the programs have achieved this status. As a result, organizations offering the programs may have to cover the costs themselves, which means that they would likely have to pass on the costs to students. These organizations are concerned about their ability to sustain their programs over the long term.

While bridging programs offer opportunities for internationally trained professionals to eliminate gaps in their educational or work experience requirements, some professions encourage international applicants to enrol in bridging programs regardless of their qualifications. Further, the Ontario College of Midwives *requires* enrolment in a bridging program before an internationally trained individual is allowed to register.

The cost of some bridging programs is already prohibitive. If bridging programs become a compulsory component of registration, this will create yet another barrier. Financial help for participation in the programs will become even more necessary.

Mutual Recognition Agreements

Currently, relatively few of the regulated professions have reached agreements with the professional bodies in all of the other Canadian jurisdictions to mutually recognize certain credentials and experience. Mutual recognition agreements (MRAs) accelerate the registration process for applicants coming from the other jurisdictions and exempt them from additional educational and qualifying experiences.

For example, the Certified Management Accountants of Ontario have agreements in place with the Chartered Institute of Management Accountants and the Chartered Institute of Public Finance and Accountancy, both of the UK.

Thirty-two of Ontario's regulatory bodies have agreements with at least some of the other Canadian jurisdictions, and six have agreements with regulatory bodies outside of Canada. (See Appendices A and B.)

Applicants' Interactions with the Regulatory Body

Generally, all regulatory bodies reported that information and contacts are readily available by phone, mail or email. Some are providing more of these services online. And some, such as the Ontario Association of Certified Engineering Technicians and Technologists (OACETT), have automatic email tracking to keep applicants informed about their registration status in a timely manner. OACETT recently implemented a policy to email its applicants approximately every two months if it did not hear from them.

The websites of regulated professions have become important vehicles for providing registration and licensing information. Ease of navigation on the sites ranges from user-friendly and intuitive to complicated and confusing. Many sites provide easy access to the profession's registration requirements and fact sheets; others require the user to navigate through many layers and links to locate basic registration information—a process that can be difficult and deflating.

If the websites for the individual regulatory bodies are to be the first points of contact for potential registrants, the sites need to provide clear information and a step-by-step path through the registration process.

Twenty-six of the regulated professions provide career maps, a joint initiative with the Ministry of Citizenship and Immigration, describing the steps an applicant needs to take to get registered in a profession. To see which professions provide career maps, refer to Appendices A and B.

Some regulated professions have developed self-assessment tools and guides that allow potential applicants to evaluate their own education and training before starting the application process.

When many internationally trained individuals come to Ontario, they lack the support, advice and networks within the field that they were trained for and that they wish to practise in Ontario. Matching programs, or mentors that could be provided through the regulated profession, would greatly help internationally trained individuals in overcoming the lack of information and resources they need to practise in their profession.

Registration Information and Statistics

The comparative analyses presented in this section of the report come from data aggregated from the OFC's 2007 study of registration practices.

The regulated professions reported that they are being asked by government and associated professional organizations to collect and track a wide variety of data, and the OFC collected more data from the professions as part of this study. This tracking and collecting of information can be difficult and costly for the regulatory bodies.

It is important that the OFC work with stakeholders to collect and share data to allow for appropriate trend analysis and quantitative measurement.

As of 2007, Ontario's regulated professions had approximately 680,000 members. Not all professions keep track of where their members were originally trained, but of those that do, the percentage of their membership that was internationally trained varies widely, from one per cent to 35 per cent (see Figure 3).

Figure 3 – Number of Members in Ontario's Regulated Professions, 2007, and Where They Received Their Training

Profession	Ontario	Other Provinces	International	Unknown	TOTAL	Proportion of International Members
Architects	1,392	477	677		2,546	27%
Audiologists and Speech Language Pathologists	N/A	N/A	N/A		3,087	N/A
Chartered Accountants	27,930	3,133	1,593		32,656	5%
Chiroprodists	389	0	113		502	23%
Chiropractors	3,696	N/A	N/A		3,696	N/A
Dental Hygienists	8,499	368	781		9,648	8%
Dental Surgeons	4,958	980	2,122		8,060	26%
Dental Technologists ¹	173	1	55		229	24%
Denturists	500	4	14		518	3%
Dietitians	1,954	687	161		2,802	6%
Engineering Technicians and Technologists	11,077	546	2,675		14,298	19%
Engineers ²	41,663	9,666	16,931		70,265	24%
Foresters ³	573	104	8		685	1%
General Accountants ^{4,5}	346	14,936	1,417	1,432	18,131	8%
Geoscientists ⁶	847	251	260		1,358	19%
Land Surveyors ⁷	N/A	N/A	N/A		645	N/A
Lawyers ⁷	N/A	N/A	N/A		38,500	N/A
Management Accountants	14,141	1,326	1,333		16,800	8%
Massage Therapists	7,577	24	43		7,644	1%
Medical Laboratory Technologists ⁸	N/A	N/A	N/A		N/A	N/A
Medical Radiation Technologists	5,937	360	463		6,760	7%
Midwives	310	7	89		406	22%
Nurses	127,794	3,931	15,546		147,271	11%
Occupational Therapists	3,468	442	443		4,353	10%
Opticians	2,505	129	25		2,659	1%
Optometrists	1,204	51	314		1,569	20%
Pharmacists	5,318	1,824	3,907		11,049	35%
Physicians and Surgeons	18,079	6,126	8,969		33,174	27%
Physiotherapists	4,457	761	1,127		6,345	18%
Psychologists	1,998	322	480		2,800	17%
Respiratory Therapists	2,247	186	76		2,509	3%
Social Workers and Social Service Workers	9,967	941	1,129		12,037	9%
Teachers ⁹	70,712	4,593	20,297	117,140	212,739	10%
Veterinarians	2,965	325	538		3,828	14%
Total	382,676	52,501	81,586		679,569	

N/A = not available

¹ Data available for all categories are incomplete.

² Total includes members who did not provide academic documents to the profession or for whom the profession's database did not have academic information.

³ Total does not include provisional, honorary, student, non-resident or resigned members.

⁴ The profession's data collection procedures only started to distinguish between Ontario and other Canadian provinces on June 1, 2007.

⁵ The profession does not differentiate U.S.-trained members from other internationally trained members. Its records also include 1,432 members whose training location is unknown.

⁶ Includes 9 members whose registration status is "limited" and 14 whose status is "temporary."

⁷ These two professions do not retain data on where their members were trained.

⁸ Because the profession only began tracking data on where members were trained in 2005, its figures are not included in this table.

⁹ The profession's data include 171,140 members whose training location is unknown.

Ontario's 10 largest regulated professions by number of members are as follows (listed from largest to smallest):

- | | |
|----------------------------|--|
| 1. teachers | 6. chartered accountants |
| 2. nurses | 7. general accountants |
| 3. engineers | 8. management accountants |
| 4. lawyers | 9. engineering technicians and technologists |
| 5. physicians and surgeons | 10. social workers and social service workers. |

Together, these 10 groups account for 90 per cent of the 680,000 regulated professionals in the province, with teachers and nurses alone accounting for more than 50 per cent of that number (see Figure 4).

The list of the 10 professions with the highest numbers of internationally trained members in 2007 is similar to the one above (listed from largest to smallest number of internationally trained members) (see Figure 5)⁷:

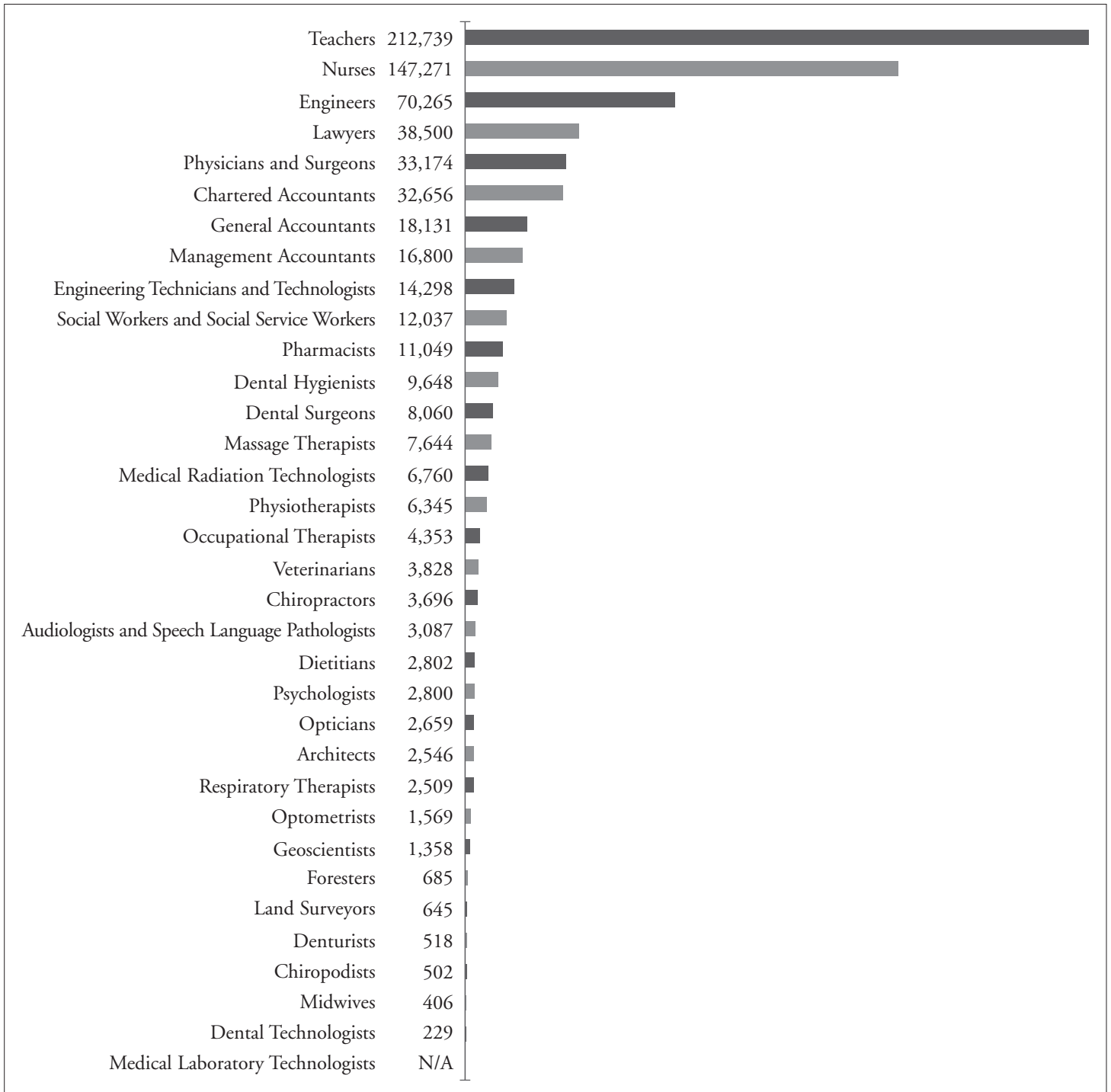
- | | |
|----------------------------|--|
| 1. teachers | 6. engineering technicians and technologists |
| 2. engineers | 7. dental surgeons |
| 3. nurses | 8. chartered accountants |
| 4. physicians and surgeons | 9. general accountants |
| 5. pharmacists | 10. management accountants. |

However, when the number of internationally trained members of a profession is measured as a proportion of the total number of members in the profession, a different order emerges. The 10 professions with the highest proportion of internationally trained members are:

- | | |
|---------------------------------|--|
| • pharmacists (35%) | • engineers (24%) |
| • architects (27%) | • chiropodists (23%) |
| • physicians and surgeons (27%) | • midwives (22%) |
| • dental surgeons (26%) | • optometrists (20%) |
| • dental technologists (24%) | • engineering technicians and technologists (19%)
and geoscientists (19%) |

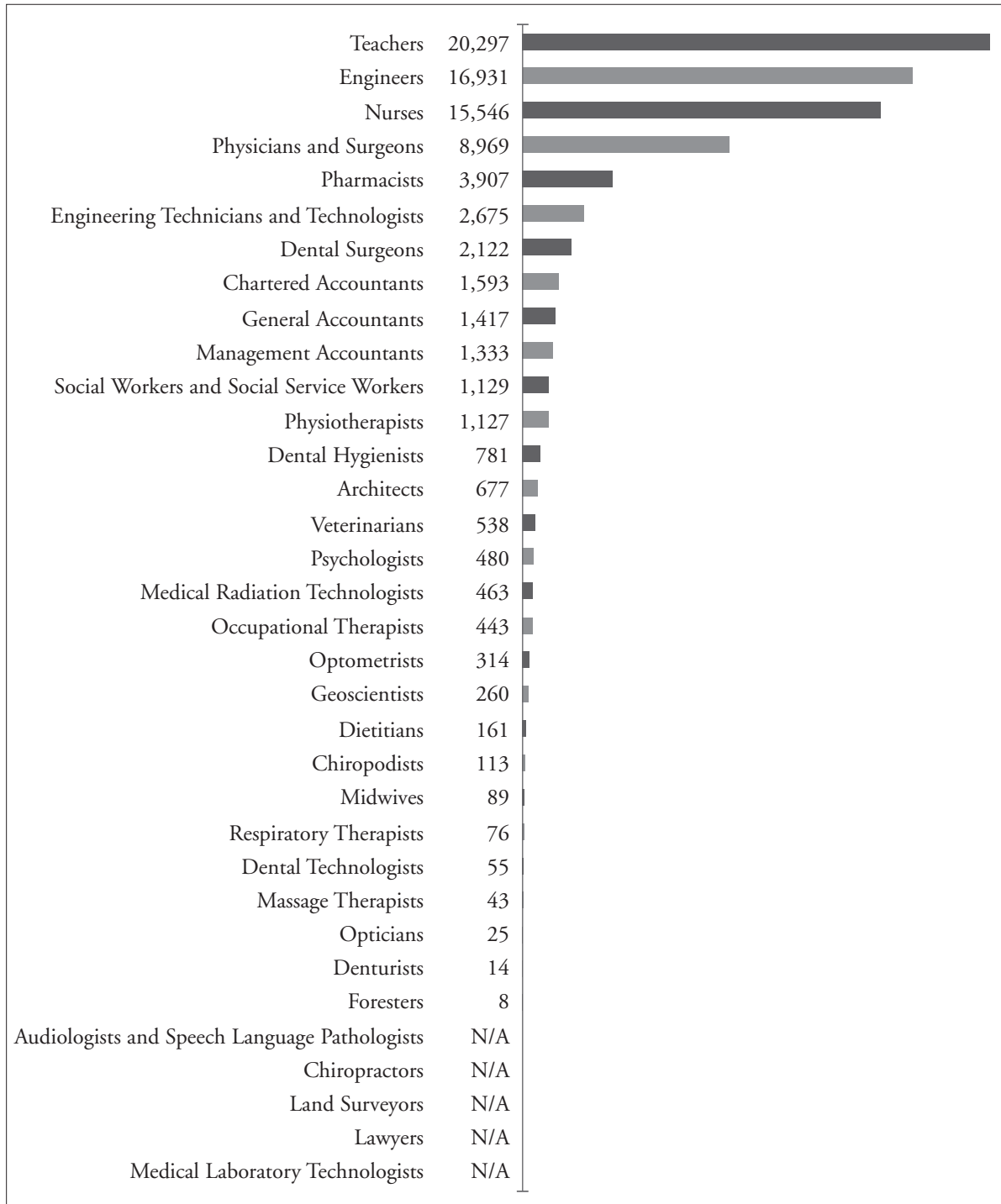
(Figure 3 shows the proportion of internationally trained members in each profession.)

⁷ Only regulated professions that keep track of where their members were initially trained appear in this list. The Law Society of Upper Canada, which is among Ontario's 10 largest regulators, does not keep track of this information.

Figure 4 – Membership in Ontario's Regulated Professions by Profession, 2007

N/A = not available

Figure 5 – Internationally Trained Members in Ontario's Regulated Professions by Profession, 2007



N/A = not available

In each of 2005, 2006 and 2007, more internationally trained than Ontario-trained applicants became members of the province's engineers and physicians and surgeons professions (see Figure 6). However, less than one quarter of the internationally trained applicants who were accepted for membership in the physicians and surgeons profession during this period received certificates allowing them to pursue unrestricted independent practice in Ontario.

Figure 6 – Number of New Members in the Engineers and the Physicians and Surgeons Professions, 2005–2007

Profession	Ontario	Other Provinces	International (includes U.S.)	TOTAL
Engineers				
2005	943	159	1,103	2,205
2006	982	161	1,146	2,289
2007	889	137	1,210	2,236
Physicians and Surgeons				
2005	1,065	550	1,132	2,747
2006	1,102	538	1,321	2,961
2007	1,155	645	1,479	3,279

India ranks first or second as the source country for nine out of the top 10 professions that have internationally trained members (see Figure 7).

Figure 7 – The Top Five Source Countries for Internationally Trained Members in 10 Ontario Regulated Professions, 2007

Professions (in descending order of number of internationally trained members)	Country Where Training Was Received				
	First	Second	Third	Fourth	Fifth
Teachers	Australia	India	New Zealand	Scotland	U.K.
Engineers	India	China	Iran	Pakistan	Iraq
Nurses	Philippines	India	Nigeria	China	U.K.
Physicians and Surgeons	India	Saudi Arabia	U.K.	Pakistan	Australia
Pharmacists	Egypt	India	Philippines	Iran	Pakistan
Engineering Technicians and Technologists	India	Philippines	Pakistan	China	Bangladesh
Dental Surgeons	India	Iran	China	Ukraine	Bulgaria
Chartered Accountants	U.S.	U.K.	South Africa	Australia	Ireland
General Accountants	India	China	U.S.	Philippines	U.K.
Management Accountants	India	U.S.	Philippines	Pakistan	China

CONCLUSION

Reducing barriers to professional registration through systemic change requires the participation and cooperation of all the stakeholders at all levels of the process. Through the Fair Access to Regulated Professions Act (FARPA) and the Health Professions Procedural Code (HPPC), this systemic change has already begun.

Initial analysis of registration practices reveals that all the regulated professions are moving towards transparent, objective, impartial and fair registration practices. The OFC observed creditable practices, efforts toward change, and positive attitudes. Notably, when FARPA was introduced in 2006, a number of regulated professions began internal reviews of their own processes for attracting and registering highly skilled professionals.

However, improvement is needed. Registration processes that are costly, prolonged and difficult can motivate professionals to seek employment elsewhere. Measuring the effect of registration practices in the regulated professions on immigrant settlement patterns in Ontario requires an ongoing gathering and analysis of information about the programs, processes and needs of the regulated professions and of all other key stakeholders.

The OFC has noted several areas of concern that impact the ability of internationally trained individuals to work in their profession in Ontario—from issues as mundane as website navigation to issues as complex as effecting government regulatory change.

More complex systemic concerns are associated with the availability of and access to residency spaces for physicians, qualification assessment, occupation-specific language training and academic programs, the cost and availability of academic and bridging programs, requirements for “Canadian experience,” and employment opportunities after a certificate or licence has been obtained. The OFC will work to connect stakeholders and reach out to employers to address these issues.

Each of these issues and others require more analysis to determine how these potential barriers can be eliminated or reduced.

This study provides foundational information that the OFC and the professions can use to measure progress in the future. The OFC will measure improvements and barriers to registration processes by collecting and analyzing statistical data through the fair registration practices reports and audits provided by the professions.

This study is a beginning.

APPENDICES

Appendix A: Findings at a Glance: The Health Regulated Professions, December 31, 2007

Observations	Health Regulated Professions									
	Audiologists and Speech-Language Pathologists	Chiropractors	Dental Hygienists	Dentists	Dental Technologists	Denturists	Dieticians	Massage Therapists	Medical Laboratory Technologists	Medical Radiation Technologists
Registration Requirements Posted on Website	•	•	•	•	•	•	•	•	•	•
Provides Career Maps										
Uses Third-Party Credential Assessments	•	•	•	•	•	•	•	•	•	•
Uses Prior Learning Assessments										
Alternative Documents Accepted	•	•	Case-by-case	•	Case-by-case	•	•	•	•	•
Typical Length of Registration Process	3 weeks, or 4 to 6 months if reviewed by registration committee	1 month to more than 1 year	Dependant on meeting registration requirements	Dependant on meeting registration requirements	8 months or more	4 months or more	At least 1 year	At least 4 to 5 months	Dependant on meeting registration requirements	4 months after requirements met
Practical Experience Requirement	•	•	•	•	•	•	•	•	•	•
Exam Requirement	•	•	•	•	•	•	•	•	•	•
Separate Law and/ or Ethics Examination	•	•								
Exams Include Those Administered by Third Parties	•	•	•	•	•	•	•	•	•	•
Applicants Able to Write Exams More Than Once	•	•	•	•	•	•	•	•	•	•
Proof of English/French Proficiency Required	•	•	•	•	•	•	•	•	•	•
Provides Internal Review and/or Appeal from Registration Decisions	•	•	•	•	•	•	•	•	•	•
Training Provided for Registration/Review & Appeal Staff	•	•	•	•	•	•	•	•	•	•
Applicants Allowed Access to Records	•	•	•	•	•	•	•	•	•	•
Related Practices										
Bridging Programs Available										
International Mutual Recognition Agreements in Place										
Mutual Recognition Agreements in place within Canada*	•	•	•	•	•	•	•	•	•	•

* Mutual Recognition Agreements vary among the professions in the number of jurisdictions included

Appendix A: Findings at a Glance: The Health Regulated Professions, December 31, 2007 (cont'd)

Observations	Health Regulated Professions										
	Registration Practices	Midwives	Nurses	Occupational Therapists	Opticians	Optometrists	Pharmacists	Physicians and Surgeons	Physiotherapists	Psychologists	Respiratory Therapists
Registration Requirements Posted on Website	•	•	•	•	•	•	•	•	•	•	•
Provides Career Maps	•	•	•	•	•	•	•	•	•	•	•
Uses Third-Party Credential Assessments	•	•	•	•	•	•	•	•	•	•	•
Uses Prior Learning Assessments	•	•	•	•	•	•	•	•	•	•	•
Alternative Documents Accepted	•	•	•	•	•	•	Contact third-party assessor	•	•	•	•
Typical Length of Registration Process	4 weeks after requirements met	3 weeks after requirements met	1 to 2 months	Dependant on meeting registration requirements	Maximum 2 years	1 to 3 years	4 to 6 months after requirements met	4 to 14 weeks after registration requirements met	18 months	6 months after requirements met	
Practical Experience Requirement	•	•	•	•	•	•	•	•	•	•	•
Exam Requirement	•	•	•	•	•	•	•	•	•	•	•
Separate Law and/or Ethics Examination	•	•	•	•	•	•	•	•	•	•	•
Exams Include Those Administered by Third Parties	•	•	•	•	•	•	•	•	•	•	•
Applicants Able to Write Exams More Than Once	•	•	•	•	•	•	•	•	•	•	•
Proof of English/French Proficiency Required	•	•	•	•	•	•	•	•	•	•	•
Provides Internal Review and/or Appeal from Registration Decisions	•	•	•	•	•	•	•	•	•	•	•
Training Provided for Registration/Review & Appeal Staff	•	•	•	•	•	•	•	•	•	•	•
Applicants Allowed Access to Records	•	•	•	•	•	•	•	•	•	•	•
Related Practices											
Bridging Programs Available	•	•	•	•	•	•	•	•	•	•	•
International Mutual Recognition Agreements in Place											•
Mutual Recognition Agreements in place within Canada*	•	•	•	•	•	•	•	•	•	•	•

* Mutual Recognition Agreements vary among the professions in the number of jurisdictions included

Appendix B: Findings at a Glance: The Non-Health Regulated Professions, December 31, 2007

Observations	Non-Health Regulated Professions												
	Chartered	General	Accountants, Management	Architects	Engineers	Engineering Technicians & Technologists	Foresters	Geoscientists	Land Surveyors	Lawyers	Social Workers and Social Service Workers	Teachers	Veterinarians
Registration Requirements Posted on Website	•	•	•	•	•	•	•	•	•	•	•	•	•
Provides Career Maps	•	•	•	•	•	•	•	•	•	•	•	•	•
Uses Third-Party Assessments	•	•	•	•	•	•	•	•	•	•	•	•	•
Uses Prior Learning Assessments						Currently designing							
Alternative Documents Accepted	•	•	•	Contact third party assessor	•	•	•	•	•	Contact third party assessor	Case-by-case basis	•	Contact third party
Typical Length of Registration Process	6 months or more	3 years or more	3 years	1 to 5 years	At least 6 months	Within 6 years	18 months or more	2 months or more	1 year or more	Within 3 years	4 to 5 week evaluation of credentials	4 to 6 weeks after requirements met	2 to 3 years
Practical Experience Requirement	•	•	•	•	•	•	•	•	•	•	•	•	•
Exam Requirement	•	•	•	•	•	•	•	•	•	•	•	•	•
Separate Law and/or Ethics Examination													
Exams Include Those Administered by Third Parties	•	•	•	•	•	•	•	•	•	•	•	•	•
Applicants Able to Write Exams More Than Once	•	•	•	•	•	•	•	•	•	•	•	•	•
Proof of English/French Proficiency Required					•					•	•	•	•
Provides Internal Review and/or Appeal from Registration Decisions	•	•	•	•	•	•	•	•	•	•	•	•	•
Training Provided for Registration/Review & Appeal Staff	•	•	•	•	•	•	•	•	•	•	•	•	•
Applicants Allowed Access to Records	•	•	•	•	•	•	•	•	•	•	•	•	•
Related Practices													
Bridging Programs Available	•	•	•	•	•	•	•	•	•	•	•	•	•
International Mutual Recognition Agreements in Place	•	•	•	•	•	•	•	•	•	•	•	•	•
Mutual Recognition Agreements in place within Canada*	•	•	•	•	•	•	•	•	•	•	•	•	•

* Mutual Recognition Agreements vary among the professions in the number of jurisdictions included. The designations recognized by all three accounting bodies are portable across Canada

Appendix C: Third Parties Used by the Regulated Professions

Profession	Third-Party Support	Service Provided
<i>Used by most</i>	World Education Service (WES)	Assesses international credentials
<i>Used by some</i>	International Qualification Assessment Service (IQAS)	Assesses international credentials
<i>Used by some</i>	University of Toronto Comparative Education Services	Assesses international credentials
Architects	National Council of Architectural Registration Boards	Administers national examination
	Canadian Architectural Certification Board (CACB-CCCA)	Assesses and certifies academic qualifications
Audiologists and Speech Language Pathologists	International Credential Evaluation Service	Assesses international credentials
Chiropodists	Michener Institute for Applied Health Sciences	Administers registration examination
Chiropractors	Canadian Chiropractic Examining Board	Conducts clinical competency examinations
Dental Hygienists	National Dental Hygiene Certification Board	Conducts content assessments (post WES) and administers national dental hygiene examination
Dental Surgeons	National Dental Examining Board of Canada	Administers national examination
	Royal College of Dentists of Canada	Administers national examination for dental specialists
	University of Toronto, Faculty of Dentistry	Assesses international credentials and conducts a clinical assessment where appropriate for the dental surgeons' two-year qualifying program
	University of Western Ontario, Schulich School of Medicine and Dentistry	Assesses international credentials and conducts a clinical assessment where appropriate for the dental surgeons' two-year qualifying program
Dental Technologists	International Credential Assessment Service of Canada	Assesses international credentials
Denturists	International Credential Assessment Service	Assesses international credentials
	International Credential Evaluation Services	Assesses international credentials

Appendix C: Third Parties Used by the Regulated Professions (cont'd)

Profession	Third-Party Support	Service Provided
Dietitians	Alliance of Canadian Dietetic Regulatory Bodies	Administers national examination
Law Society	National Committee on Accreditation	Assesses international credentials and administers qualifying examinations
Management Accountants	Society of Management Accountants of Canada	Administers national examination
Massage Therapists	Centennial College, Centre for Applied Research and Health Technology and Education	Assesses equivalencies
Medical Laboratory Technologists	Canadian Society for Medical Laboratory Science	Conducts prior learning assessments and administers examinations
Medical Radiation Technologists	Canadian Association of Medical Radiation Technologists	Sets and administers certification examination
Midwives	International Midwifery Pre-Registration Program	Conducts clinical examinations and offers bridging program required for registration
Nurses	Assessment Strategies Incorporated	Administers national examination
Occupational Therapists	Canadian Association of Occupational Therapists	Administers national certification examination
Opticians	National Association of Canadian Optician Regulators	Administers the national examinations
Optometrists	Canadian Examiners in Optometry	Administers the national examination and conducts prior learning assessment
Pharmacists	Pharmacy Examining Board of Canada	Evaluates credentials and administers examinations
Physicians and Surgeons	College of Family Physicians of Canada	Administers national examination
	Royal College of Physicians and Surgeons	Administers national examination
	Centre for the Evaluation of Health Professionals Educated Abroad	Serves as an assessment centre for access to the selection process for residency positions
	Medical Council of Canada	Administers registration examinations
Physiotherapists	Canadian Alliance of Physiotherapy Regulators (The Alliance)	Evaluates educational credentials and administers examinations
Psychologists	Association of State and Provincial Psychology Boards	Administers registration examination

Appendix C: Third Parties Used by the Regulated Professions *(cont'd)*

Profession	Third-Party Support	Service Provided
Respiratory Therapists	Canadian Board for Respiratory Care	Administers entry-to-practice examination
	Michener Institute for Applied Health Sciences	Coordinates the prior learning assessment (PLA) process
	Algonquin College	Coordinates the PLA process
Social Workers	Canadian Association of Social Workers	Assesses international credential equivalency
Veterinarians	American Veterinary Medical Association	Administers the national examinations in the U.S.
	National Examining Board	Administers national examinations in Canada and provides initial verification of credentials