

College of RESPIRATORY THERAPISTS 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 RESPIRATORY THERAPISTS of Ontario
--------------------------	--

For questions about this report, please contact:

Name	Carole Hamp
Job Title	Registrar
E-mail	hamp@cрто.on.ca
Name	Lisa Ng
Job Title	Manager of Registration
E-mail	ng@cрто.on.ca

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 RESPIRATORY THERAPISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Respiratory Therapist
Academic requirement	An applicant for registration must have graduated from an approved Canadian Respiratory Therapy program or have demonstrated through the CRTO's assessment process that they have the required entry-to-practice competencies.
Experience requirement	The CRTO does not have an experience requirement. However, applicants for registration must meet the currency requirement. That is,

	<p>applicants for General and Graduate Certificates of Registration must have graduated from their Respiratory Therapy (RT) program within two years immediately preceding the application for registration unless the applicant was practicing Respiratory Therapy within those two years. For more information, please see the Registration Currency Policy: https://www.crto.on.ca/pdf/Policies/Policy.RG-410.pdf</p>
Language requirement	<p>An applicant for registration must be able to communicate effectively in English or French in a healthcare environment. The applicant will meet the language fluency requirement if their first language is English or French, the language of their RT program instruction is English or French, or the applicant has achieved an acceptable score on a CRTO accepted language test. For approved tests and scores, please refer to the Language Proficiency Requirements Policy https://www.crto.on.ca/pdf/Policies/Policy.RG-407.pdf</p>
Additional information on licensing requirements (may include links to appropriate page on regulator website):	<p>Registration requirements are outlined in the Registration Regulation (O. Reg. 596/94 Part VIII under the Respiratory Therapy Act, 1991: https://www.ontario.ca/laws/regulation/940596#BK9 To make registration information more accessible, they are also listed on the CRTO's registration requirements web page: https://www.crto.on.ca/applicants/registration-requirements-and-how-to-meet-them-2/</p>

4. Third party assessments

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

Organization name	Function
EQual / Accreditation Canada	Academic credential evaluation
Health Professionals Testing Canada	Knowledge based exam

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

EQual/Accreditation - Canada's health education accreditation program assesses educational programs against standards developed by the Health Standards Organization (HSO). EQual provides accreditation services for 20 health profession education programs, including Respiratory Therapy. The program involves a six-stage accreditation process conducted over a six-year cycle. All Ontario RT educational programs, as well as most Canadian RT programs and one international RT program, are assessed and certified under the same Accreditation Canada standard. The National Alliance of Respiratory Therapy Regulatory Bodies (NARTRB), which the CRTO is a member of, has an agreement with EQual. The CRTO has a parallel Client Agreement with EQual that is reviewed and renewed annually by the Registrar. EQual holds quarterly meetings of all members, which provide an opportunity for dialogue on regulatory matters and policies, program insights and results, and program policy changes. Concerns regarding the fairness of the accreditation process can be brought forward to EQual by any of the educational facilities and/or EQual members. Also, the members can participate in accreditation surveys to share their knowledge.

Health Professionals Testing Canada (HPTC) - The HPTC develops and conducts the national registration examination that the CRTO Council has approved. The HPTC exam is based on the most current National Competency Framework, which sets the examination weighting matrix. The CRTO has a Service Agreement with the HPTC that is reviewed and renewed annually. As part of this agreement, HPTC provides the CRTO with copies of all formal reports, analyses, studies, or other documentation regarding the examination's validation, reliability, scoring method, or other relevant characteristics. In the agreement, the HPTC agrees to

perform its obligations in a manner consistent with its privacy policy and per the principles of transparency, objectivity, impartiality and fairness.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	In 2023, the CRTO successfully addressed several significant regulatory changes, including those related to Registration Regulation, Controlled Acts Regulation, and Exemption - Restricted Titles Regulation. Due to these changes, many of the CRTO's policies, procedural documents, webpages, and other materials were updated or developed. In addition, the CRTO conducted a thorough review of the Registration Regulation, with a focus on enhancing the efficiency of registration processes and ensuring alignment with other Respiratory Therapy jurisdictions. Proposed amendments to the regulation have been submitted to the Ministry of Health, and the CRTO is awaiting updates from the Ministry.
2	CRTO's 2021 – 2025 Strategic Direction (highly competent & effective Council): In March 2023, the CRTO enlisted the services of a third-party assessor to evaluate the effectiveness of the Council. This assessment was conducted to fulfill the obligation of a third-party assessment, as outlined in the College Performance Measurement Framework (CPMF). According to the assessor's feedback, the CRTO and its Council members have met the requirements outlined in the principles of good governance. These include: Providing orientation and training to Council members prior to their first Council meeting. Ensuring Council members understand a Conflict of Interest in the context of the Regulated Health Professions Act (RHPA) and the Council's operations. Consistently considering the public interest in all Council decisions. Maximizing transparency in the Council's decision-making processes. Deliberating in-camera matters only when confidentiality is mandated for legal purposes or privacy concerns. Implementing the principles of Right Touch Regulation in Council decision-making, prioritizing

	regulatory resources on matters posing the greatest risk to public protection. The involvement of a third-party assessment ensures that Council members are competent in their decision-making process, including in registration-related decisions.
3	As part of the 2021 - 2025 Strategic Direction, the CRTO has initiated quarterly reporting on Key Performance Indicators (KPIs) for each program area to the Council. Specifically, in the Registration department, these KPIs play a crucial role in ensuring that the CRTO not only meets but also surpasses the processing timeline requirements mandated by the Registration Requirements Regulation. The reporting of the KPIs enhances accountability and transparency within the organization while facilitating continuous improvement in registration processes.

B. Risks and Mitigations

Risk	Mitigation Measure
IT and Records Management	The CRTO maintains all membership records and data in electronic form. To address potential risks such as IT infrastructure disruptions, data integrity compromises, and unauthorized access to records (e.g., cyber-attacks), the CRTO has engaged the services of a cybersecurity company (ISA). ISA conducted a comprehensive assessment of the CRTO's IT security architecture to identify vulnerabilities and provide recommendations for remedial actions. The CRTO has begun implementing the recommended measures to ensure the security of its data. Additionally, the CRTO has implemented a comprehensive staff training program focused on cybersecurity to enhance awareness and preparedness. Aside from security changes, the CRTO is in the process of implementing a new database. There are potential risks to integrating a new database, such as slower processing time as staff become familiar with

	<p>the new system. The CRTO plans to mitigate this risk through comprehensive staff training and utilizing the resources provided by the vendor.</p>
<p>Unaccredited Ontario Programs</p>	<p>By December 2024, the CRTO will have a group of graduates from a new Ontario RT program that has not yet received accreditation through Accreditation Canada. Therefore, the CRTO may be in a situation where it is necessary to determine how to register a graduating class of RTs from an unaccredited educational program. Currently, the CRTO only approves programs that obtain and maintain accreditation status through Accreditation Canada. The current Registration Regulation does not permit the CRTO to assess students graduating from a Canadian program, if their program is not accredited. In 2023, the CRTO submitted proposed changes to its existing Registration Regulation that would enable the CRTO to assess students who may graduate from an unaccredited Canadian program. This would allow the CRTO to ensure that students graduating from an unaccredited domestic education program have the requisite entry-to-practice competencies necessary to safeguard the public. The CRTO has been in communication with the Ontario Ministry of Health regarding the above-mentioned situation and hopes to have a resolution by the end of this calendar year.</p>
<p>Clinical Skills Assessment Fees and the increased number of internationally educated healthcare professionals applying to register with the CRTO.</p>	<p>The CRTO was recently required to increase the Clinical Skills Assessment (CSA) fee for Internationally Educated Healthcare Professionals (IEHPs). This fee increase was due to the increased cost of booking the</p>

	<p>appropriate simulation facility necessary to complete the CSA. Applicants are now required to pay the CSA fee of \$5,000 (previously the fee was \$4,250). This fee increase is out of the CRTO’s control and may pose a risk of making the assessment process financially inaccessible to applicants. The fee increase, coupled with the increase in the number of IEHPs (including those from other jurisdictions, which the CRTO assesses on behalf of most other regulated RT jurisdictions in Canada) may be putting the CRTO at additional risk. This is because of the finite capacity and resources available to manage these applications. To mitigate these risks, the CRTO is looking at the possibility of utilizing other, potentially less costly simulation facilities to conduct the assessment. In addition, the CRTO may increase the number of staff to support the CRTO’s Entry-to-Practice Competency Assessment program.</p> <p>https://www.crto.on.ca/pdf/Policies/Policy.RG-425.pdf</p>
--	--

6. Changes to registration practices

During the January 1 to December 31, 2023 reporting period, College of RESPIRATORY THERAPISTS 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
Registration requirements either through regulation, by-law or policy	Yes	<p>The CRTO drafted a new Vulnerable Sector Checks policy in 2023. The draft policy was posted for public consultation and then subsequently approved in March 2024. The policy will come into effect on September 1, 2024. As part of its public interest mandate, the CRTO must ensure that applicants' past and present conduct affords reasonable grounds for these belief that they will practice respiratory therapy with decency, integrity, honesty, and in accordance with the law. To this end, under the new policy, all applicants for registration will be required to submit the results of a Vulnerable Sector Check (VSC) as part of their application for registration with the CRTO. For more information, please see the VSC policy: https://cрто.on.ca/pdf/Policies/Policy.RG-430.pdf. The CRTO anticipates that the VSC requirement will delay registration timelines. To mitigate the potential delays in processing applications, the CRTO staff is making changes to the application portal and reviewing its processes and procedures to ensure smooth implementation of the new requirement. In addition, to ensure that applicants are aware of the new requirement, CRTO staff developed a comprehensive communication plan, which includes updates to CRTO's website (e.g., a new FAQ webpage), visits to RT schools in Ontario, and updates to our guidance documents. The Ontario government introduced the "As of Right" rules in 2023. Out-of-province regulated RTs (inter-jurisdictional RTs) who meet specific conditions may start working in public Ontario</p>

	<p>hospitals, long-term care homes, and the University of Ottawa Heart Institute without having to first register with the CRTO. Once the Exemption–Restricted Title Regulation came into place, the CRTO created a new webpage to communicate the new provision and updated various registration-related documents (guides, fact sheets, and forms) to outline this change. The Ontario Ministry of Health (MOH) also amended portions of O. Reg 596/94 (General - Part VIII – Registration) to enable the creation of an Emergency Class of Registration. The CRTO’s Emergency Registration Policy was revised to align with these regulation amendments. Additionally, the CRTO drafted By-Law revisions to include the renewal and fee structure of the Emergency Registration Class (these By-law revisions were approved in March 2024. The Graduate Certificate of Registration Policy has been revised in 2023 to ensure that it is consistent with relevant legislation and existing registration practices. Specifically, the policy was updated to reflect the amendments under section 14 of the Controlled Acts Regulation (O. Reg. 107/96) pertaining to tracheostomy tube changes. Although these changes do not directly relate to the CRTO's registration requirements, they ensure that applicants for registration in the Graduate Class have a clear understanding of the conditions that will apply to their certificates of registration. The Application for Registration - File Closure Policy was revised in 2023 to ensure its alignment with legislation and existing registration practices. This revision was prompted by changes to legislation, specifically Ontario Regulation 199/23 Exemption - Restricted Titles, which now allows</p>
--	---

		inter-jurisdictional Respiratory Therapists meeting specified conditions to work before registration with the CRTO. Although the policy has been updated to reflect these legislative changes, it's important to note that the intent and direction of the original policy remain unchanged. As such, the CRTO does not anticipate any associated risks with this revised policy.
New or consolidated class of certificates or licenses	Yes	In 2023, the Registration Regulation was amended to include the new Emergency Certificates of Registration RT(E). In response to this change, the CRTO developed a new webpage and updated several policy documents, including the Emergency Registration Policy and the Registration and Use of Title Professional Practice Guideline. Applications to the Emergency Class will be open when the CRTO Council or the government determines that there is an emergency, and it is in the public interest to register applicants in the Emergency Class. Additionally, the CRTO drafted CRTO's By-Law revisions to include the renewal and fee structure of the Emergency Registration Class (these By-law revisions were approved in March 2024).
Assessment of qualifications, including competency-based assessments and examinations	No	
Documentation requirements for registration	Yes	In 2023, the CRTO drafted a new Vulnerable Sector Checks policy. The policy was approved in March 2024 and will come into effect on September 1, 2024. Applicants will be required

		<p>to submit the result of the VSC to the CRTC as part of their application. This policy applies to all applicants seeking registration with the CRTC, including those applying for initial registration and those applying for reinstatement (e.g., from suspension, resignation, or revocation). Although the policy was drafted in 2023, it will not be implemented until September 2024. Therefore, there has been no impact on applicants for the reported year. The CRTC anticipates that once implemented, this requirement will potentially impact applicants as there will be an additional cost to obtain the VSC report, and there may be some delays due to the processing timelines. To ensure that applicants are aware of the new requirements, CRTC staff will communicate these changes via the CRTC's website, application guides have also been updated to communicate this change. Additionally, CRTC Staff will visit RT schools in Ontario to communicate the requirements for registering with the CRTC.</p>
<p>Timelines for registration, decisions and/or responses</p>	<p>Yes</p>	<p>In 2023, the CRTC developed a set of Key Performance Indicators (KPIs), which include indicators from the Registration Program. The Registration KPIs were developed to measure the efficiency and efficacy of the CRTC's registration program in providing applicants with written acknowledgments of receipt of applications, communicating any missing documents, and issuing registration decisions. According to the quarterly KPI reports, the CRTC consistently meets the registration requirements outlined in the Registration Requirements Regulation (O. Reg. 508/22). Typically, staff respond to applications within 1-2 business days. Moreover, the average</p>

		turnaround time for a Registrar to make a registration decision (e.g., approve a completed application or refer it to a Panel of the Registration Committee) is within five business days.
Registration and/or assessment fees	Yes	No fee changes have been implemented during the reporting year. However, in 2023, the Council approved the following for the 2024/25 registration year (effective March 1, 2024): the Registration fee increase from \$650 to \$700; the Clinical Skills Assessment fee increase from \$4,250 to \$5,000; and the Emergency Certificate of Registration – registration fees set at \$350. For a breakdown of the registration-related fees, please visit the Schedule of Fees: https://www.crto.on.ca/members/schedule-of-fees/ . For the 2024 year, the CRTO increased the registration fee from \$650 to \$700. In addition, the CRTO included the Emergency Certificate Registration Fee. For applicants applying to the emergency class (when an emergency is declared by the CRTO's Council), there is a set fee of \$350 to issue an Emergency Certificate, and the renewal fee for the Emergency Certificate is \$350. The clinical skills assessment fee for internationally educated healthcare professionals (IEHPs) has been updated from \$4,250 to \$5,000. This new fee will apply to IEHPs applying to the CRTO from March 1, 2024. The increase in the fee is a result of the rise in fees charged by the simulation facility for conducting the clinical skills assessment. The average cost per candidate to run a single clinical skills assessment is slightly over \$5,000, meaning the CRTO has been incurring a loss per assessment. To offset these costs, the CRTO's Council passed a motion in December 2023 to

		increase the fee to \$5,000. The CRTO acknowledges that this fee increase does impact IEHP applicants and may add additional financial barriers to applicants. To address these concerns, the CRTO is exploring alternative facilities to potentially host the clinical skills assessment.
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	The CRTO's legal counsel provides an annual training session for the Registration Committee and Registration staff. The training session covers various important topics, including decision-making processes, assessing qualifications, and making registration and review decisions. It also addresses any special considerations that may arise during the assessment of applicants and explains the procedures for applying those considerations. Additionally, the session delves into issues related to human rights, anti-discrimination, and providing accommodation for accessibility. Furthermore, the training emphasizes the CRTO's duty to provide transparent, objective, impartial, and fair registration practices.
Resources or training to support	Yes	Within the CRTO's website, an "Applicants" tab is dedicated to providing resources for

<p>applicants to move through the licensing process</p>		<p>applicants. Navigating through this section allows applicants to easily access and review the registration requirements. They can select from different sections tailored to their circumstances, such as applicants from Canadian RT programs, other Canadian jurisdictions, or those educated outside of Canada. Each section provides background information and step-by-step outlines of the application process. Additionally, relevant links on the right-hand side of each webpage offer further resources to guide applicants through the licensing process, including application guides, assessment guides, various registration-related policies, verification forms, and fact sheets. To ensure currency and accuracy, registration-related webpages undergo continuous review and updating to align with current practices. For example, in 2023, the CRTO added the Emergency Class webpage to provide information about the new Class of Registration. In addition to the online resources, applicants can also contact the CRTO via email or through the "Contact Us" form available on the website. In addition to the information available on the CRTO's website, registration staff typically respond to inquiries within 1-2 business days. Additionally, internationally educated applicants have the opportunity to meet one-on-one with CRTO staff after completing each stage of the assessment process. Furthermore, a comprehensive two-step orientation to the Clinical Skills Assessment is provided to ensure applicants understand the assessment process thoroughly.</p>
<p>Anti-racism and inclusion-based</p>	<p>Yes</p>	<p>In 2022, the CRTO enlisted the services of Canadian Equality Consulting (CEC) to help</p>

<p>policies and practices</p>		<p>develop an organizational Diversity, Equity, and Inclusion (DEI) Strategy. The CRTO is currently in the process of implementing the identified action items. Specifically, in 2023, the CRTO: - Established a DEI Steering Committee and formulated a DEI action plan. Developed/updated an Equity Impact Assessment Tool to guide the identification and monitoring of equity impacts and outcomes of policies, programs, and standards on applicants and registrants. Over the upcoming year, the CRTO intends to further refine its approach to analyzing current and newly developed policies through a DEI lens. The CRTO identified several Key Performance Indicators (KPIs) in relation to its DEI strategy and started reporting on these KPIs in the quarterly Strategic Direction updates. CRTO Council has regularly been updated on the initiatives identified within the DEI Action Plan, the purpose of these initiatives, and the actions taken. At each Council meeting, staff present the CRTO's Strategic Plan Progress Tracking Report, which includes the progress the College is making on its DEI initiatives.</p>
-------------------------------	--	--

C. System partners

<p>Registration process</p>	<p>Changes Made (Yes / No)</p>	<p>Description</p>
<p>Steps to increase accountability of third-party service provider(s)</p>	<p>Yes</p>	<p>The CRTO conducts a thorough review of third-party service providers prior to contracting. For example, the most recent Equal (Accreditation Canada's health education accreditation program service provider) contract underwent both a CRTO and legal counsel review and revision prior to approval. The Client</p>

		<p>Agreement with Accreditation Canada is reviewed and renewed annually. The agreement sets out the obligations of Accreditation Canada to meet its stated timelines for delivering its services. The agreement also includes confidentiality diversity, and inclusion provisions. The Service Agreement with the HPTC (exam provider) is reviewed and renewed annually. As part of this agreement, HPTC provides the CRTO with copies of all formal reports, analyses, studies, or other documentation regarding the examination's validation, reliability, scoring method, or other relevant characteristics. In the agreement, HPTC agrees to perform its obligations in a manner consistent with its privacy policy and in accordance with the principles of transparency, objectivity, impartiality and fairness.</p>
<p>Accreditation of educational programs</p>	<p>Yes</p>	<p>The CRTO's Council review and approve the list of approved respiratory therapy programs by the EQual/Accreditation Canada annually per the Approval of Canadian Education Programs policy: https://www.crto.on.ca/pdf/Policies/Policy.RG-408.pdf. EQual - Accreditation Canada's health education accreditation program assesses educational programs against standards developed by the Health Standards Organization (HSO). EQual provides accreditation services for 20 health profession education programs, including Respiratory Therapy. The program involves a six-stage accreditation process conducted over a six-year cycle. All Ontario RT educational programs, as well as most Canadian RT programs and one international RT program, are assessed and certified under the same</p>

		<p>Accreditation Canada standard. The National Alliance of Respiratory Therapy Regulatory Bodies (NARTRB), which the CRTO is a member of, has a parallel agreement with EQual. The CRTO has a Client Agreement with EQual that is reviewed and renewed annually. The Client Agreement sets out the obligations of Accreditation Canada to meet its stated timelines for delivering its services. The agreement also includes confidentiality provisions, diversity, and inclusion. Educational facilities can appeal the decisions rendered by EQual once an assessment has been completed. A program that underperforms against the accreditation standards and receives a decision of non-accreditation has the option to either appeal the decision or re-apply after a waiting period of 12 months. For a list of approved respiratory therapy programs, please see: https://accreditation.ca/assessment-programs/health-education-accreditation/programs/.</p>
Mutual recognition agreements	Yes	<p>In addition to our internationally educated healthcare professional applicants, the CRTO conducts the entry-to-practice assessment for applicants referred by other Canadian jurisdictions. In 2023, the CRTO established a Memorandum of Understanding (MOU) between itself and the other regulated Canadian Respiratory Therapy (RT) jurisdictions to identify the roles and responsibilities of each party as they relate to the CRTO's IEHP Entry to Practice (ETP) Competency Assessment.</p>

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
Emergency registration plans	Yes	<p>In 2022, in an effort to strengthen Ontario’s health human resource capacity, the government introduced a new regulation under the Regulated Health Professions Act, 1991 which requires that health regulatory Colleges, including the CRTC, have an Emergency Class of Registration. Per the requirement, the CRTC amended its Ontario Regulation 596/94, PART VIII Registration to include the Emergency Class. In addition, Part VII Prescribed Procedures and Part VII.1 Prescribed Substances were also amended to ensure that members registered in the Emergency Class can provide the necessary patient care. Similarly, the Controlled Acts Regulation has been amended to allow a member who holds an Emergency Certificate to perform tracheostomy tube changes and diagnostic ultrasound. With respect to the addition to the Emergency Class of Registration, the CRTC drafted amendments to its By-Laws to include fees associated with the Emergency Certificate of Registration. The following policies were also updated to align with the new Emergency Class: - Emergency Registration Policy (approved by Council on December 1, 2023). - Graduate Certificate of Registration Policy (updated by the Registration Committee on November 14, 2023).</p>
Technological or digital improvements	Yes	<p>For the reported year, there were no technological changes related to registration. However, the CRTC is currently collaborating with a program developer to create a new database for handling membership data, along</p>

		with developing a new application portal and redesigning the website. The goal of the new database is to enhance efficiency in managing applications and streamline the processing of registration fees.
Steps to address labour shortages in the profession or trade	Yes	<p>During 2023, the CROTO worked with the Ministry of Health and our system partners on a number of initiatives aimed at addressing health human resources. These include As of Right provision (Exemption – Restricted Titles Regulation). For more information on the "As of Right" exemption, please visit https://www.cрто.on.ca/as-of-right-%20exemption/. Additionally, amendments were made to parts VII (Prescribed Procedures) and VII.1 (Prescribed Substances) under O. Reg. 596/94 General, as well as the Controlled Acts Regulation (O. Reg. 107/96), enabling Respiratory Therapists (RTs) in the Emergency Class and those practicing under the “As of Right” exemption to perform controlled acts authorized to the profession.</p> <p>Emergency Registration Policy: During times of emergency and/or health crisis, the CROTO's Council may declare it in the public interest to issue certificates of registration in the Emergency Class RT(E). Additionally, in these emergency circumstances, the Registration Committee may authorize the Registrar to waive certain registration requirements for applicants in the General and Graduate Classes who meet the conditions outlined in the policy. The Emergency Registration Policy intends to expedite the registration process during emergencies. For further details on the Emergency Registration Policy, please refer to: https://www.cрто.on.ca/pdf/Policies/Policy.RG-412.pdf. NARTRB: members of the National</p>

		Alliance of Respiratory Therapy Regulatory Bodies (NARTRB) have collaboratively worked over the years to harmonize their registration practices, aiming to facilitate effective and efficient labour mobility of Respiratory Therapists (RTs) across Canada. Currently, the NARTRB is establishing national Standards of Practice for all RTs throughout Canada. When drafting the changes to its Registration Regulation the CRTC conducted a comprehensive national jurisdictional review. The objective was to align its practices as closely as possible with those of other provinces where Respiratory Therapy is regulated. This review encompassed evaluating the currency and suitability requirements for practice set by all other Canadian RT regulators, as well as their minimum practice hours requirements and maximum number of exam attempts.
Other	No	

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:

--

B. Other identity-based or demographic data collected

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

Additional description:

--

C. Languages of service provision

College of RESPIRATORY THERAPISTS 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
Respiratory Therapist	4014

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Full / General/ Independent Practice	3697	64
Inactive	280	3
Graduate	33	2
Limited	4	0

Gender	Number of Members
Male	1033
Female	2981

Jurisdiction of Initial Training	Number of Members
Ontario	3744
Other provinces and territories	200
United States	57
Other International	13

Country of Initial Training	Number of Members
Canada	3944
China	1
India	6
Iran	1
Philippines	2
Qatar	1
Ukraine	1
United States of America	57

Venezuela	1
-----------	---

Official language of preference	Number of Members
English	3904
French	110

Racial identity (optional)	Number of Members
Not collected	4014

E. Data Notes

The CRTO is considering collecting race-based data in the future and is researching the types of data it should gather to ensure that it serves a meaningful purpose.

F. Applicant Profile

Profession Name	Total Number of Applicants
Respiratory Therapist	227

Gender	Number of Applicants
Male	56
Female	171

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	173	17
Other provinces and territories	22	5
United States	8	8
Other International	24	24

Country of Initial Training	Number of Applicants
Afghanistan	1
India	7
Canada	195
Iran	5
Philippines	7
United States of America	8
Pakistan	3
Qatar	1

Official language of preference	Number of Members
English	216
French	11

Racial identity (optional)	Number of Members
Not collected	227

G. Data Notes

--

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	160		3
Other provinces and territories	17		0
United States	1		0
Other International	3		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 Graduate Certificate of Registration	130 32	0 2

J. Data Notes

For B7, data for pending applications that are incomplete, missing application fees, or closed after 12 months of inactivity are not reported.

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	9	0
United States	1	0
Other International	3	0
Other provinces and territories	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	1	0
United States	0	0
Other International	1	0
Other provinces and territories	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
1. The Panel of the Registration Committee refused to lift all the terms, conditions and limitations. 2. The Panel of the Registration Committee refused to issue a General Certificate of Registration.	1 1

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
1. The applicant did not meet the non-exemptible registration requirements.	1

L. Data Notes

For question B10, a panel of the Registration Committee (RC) reviewed a total of 14 files. Among these, 9 applications were initially from individuals educated in Ontario, and 1 applicant was educated in B.C. Out of the 9 applications from Ontario, one appeal to HPARB was received, and the result of the HPARB is still pending. Additionally, the panel reviewed 4 applications from internationally educated healthcare professionals (IEHPs) who completed the CRTO's entry-to-practice assessment process. In all 4 files, the Registration Committee decided to issue a Graduate Certificate of Registration with terms, conditions, and limitations

after the applicants complete a remediation plan. For question B.11, the CROTO received one appeal to HPARB during the reported year. The appeal is from a graduate of an approved RT program in Ontario. They requested all the terms, conditions, and limitations (TCLs) on their certificate of registration to be lifted. The TCLs were applied due to a prior decision made by a panel of the RC. This file has not been concluded, and the results of HPARB are still pending. Additionally, during the reporting year, the CROTO received an HPARB decision regarding an appeal filed in 2021. The HPARB decision confirmed the Registration Committee's decision for the Registrar to refuse to issue the applicant a certificate of registration (*Bugarin v College of Respiratory Therapists of Ontario, 2023*).

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 RESPIRATORY THERAPISTS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of RESPIRATORY THERAPISTS 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).

The CRTO does not require applicants for registration to have Canadian RT experience.

B. Language Proficiency Testing

Change required: Yes

College of RESPIRATORY THERAPISTS 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:

The CRTO's current language proficiency requirements are detailed in the Language Proficiency Requirements Policy (<https://www.crto.on.ca/pdf/Policies/Policy.RG-407.pdf>). The CRTO updated the policy in December 2022 to ensure alignment with new legislative requirements. In 2024, the CRTO enlisted a consultant to review the policy and provide recommendations, specifically regarding the inclusion of the Pearson Test of English (PTE) Core as part of the tests accepted by the CRTO. The revised Language Proficiency Requirements Policy was reviewed by the Registration Committee in May 2024 and subsequently approved by the Council during the June 2024 meeting.

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

- IELTS (General)
- CELPIP (General)
- TEF Canada
- TCF Canada
- Other language proficiency tests

- Education in English or French
- Other (please specify) <https://www.crto.on.ca/pdf/Policies/Policy.RG-407>

C. Emergency Registration

Change required: Yes

College of RESPIRATORY THERAPISTS 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 CRTO has made significant revisions to its Registration Regulation, notably incorporating the emergency class. For detailed information regarding these changes, please refer to [Ontario Regulation 940596](<https://www.ontario.ca/laws/regulation/940596>). Moreover, the CRTO developed a dedicated webpage specifically addressing the emergency class. For more information, visit <https://www.crto.on.ca/applicants/emergency-class/>. Additionally, the CRTO's Council has approved revisions to several policy documents, including the Emergency Registration Policy, which outlines the circumstances under which the CRTO will issue Emergency Certificates of Registration. The By-Laws and the Registration Use of Title Professional Practice Guideline were also revised to align with the addition of the Emergency Class of Registration. The By-Laws and the Registration and Use of Title Professional Practice Guideline received final approval by the Council in March 2024. For further details regarding the Emergency Class, please see the Emergency Registration Policy](<https://crto.on.ca/pdf/Policies/Policy.RG-412.pdf>).

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.