#33

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Page 1: Fair Registration Practices Report 2021

Q1

Please indicate which regulator you are and your main point of contact should we require follow up.

College of Medical Radiation and Imaging Technologists of Ontario (CMRITO)

Caroline Morris, Deputy Registrar & Registration Director

Q2

Section 1 - During the reporting period (January 1st–December 31st, 2021), please indicate if your organization has introduced any changes in the following areas impacting your registration processes by clicking on each of the appropriate boxes below.Registration requirements either through regulation, by-law or policy.

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes to the registration requirements in this reporting period.

Q3

New or consolidated class of certificates or licenses

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes to the classes of certificates or licenses issued by the CMRITO in the reporting period.

Q4

Assessment of qualifications

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes in the processes used by the CMRITO Registration Committee to assess the qualifications of applicants in the reporting period. The CMRITO has continued the practices that were instituted in 2020 in response to the pandemic. These include: 1. the expanded use of credential evaluation reports that applicants have already completed through credentialing agencies such as WES, ICAS or the Medical Council of Canada for the authentication and validation of program documents from organizations where applicants had completed their education. The expanded use of pre-existing credential evaluation reports for validation and authentication has continued to simplify the process for applicants while still maintaining the integrity of the authentication process. 2. The use of two additional language test options. These additional language test options are approved by the Registration Committee for use by applicants who are required to demonstrate their language fluency in English. • The Registration Committee approved the use of the IELTS indicator test. This language assessment test is offered remotely and can be taken from an applicant's home. The test includes four skills – Listening, Reading, Writing and Speaking and the same required test scores approved on the IELTS Academic and General Training tests have been approved for this test. • The Registration Committee also approved the use of the TOEFL iBT Home Edition of the TOEFL test. The test is identical in content, format and on-screen experience to a test taken at a test center and is taken on an applicant's computer at home and monitored by a human proctor online through ProctorU®. The approval of the additional online language testing options has increased the availability of tests for applicants as the TOEFL test is available 24 hours a day, 4 days a week, with appointments as early as 24 hours after an applicant registers and the IELTS test is offered every 2 weeks

Q5

Timelines for registration, decisions and/or responses

No,

Description of change/improvement that would impact fair registration outcomes:
There has been no change in the timelines for the registration, decisions or responses to applicants in the reporting period. The Registration Committee continued to see increased volumes of applications in 2021 as compared to the volumes experienced in prior years. The Committee continued to meet with increased frequency in 2021 to meet the demand. The Registration Committee continued the use of smaller panels of the Committee to be able to review an increased number of applications at each meeting. The Registration Committee also continued the electronic approval process for Decisions, Orders and Reasons on all applications that were reviewed, and applicants have been able to receive their decision from the Registration Committee in accordance with the published timelines of three to four months.

Q6

Registration and assessment fees

No,

Description of change/improvement that would impact fair registration outcomes:
There have been no changes in the registration and assessment fees paid by applicants in the reporting period.

Q7

Resources for applicants

Yes,

Description of change/improvement that would impact fair registration outcomes:

The CMRITO has continued to expand the information on a new applicant resources page on the College website to provide information to applicants about a range of resources that are available to assist applicants. The "Resources for Applicants" page can be found at this link. https://www.cmrito.org/applicants/international-applicants/resources-for-applicants/ The resources page includes information for applicants on the CMRITO Council approved examinations, bridging programs, related courses, and other resources. The information on the approved examinations includes direction on how to apply and links to courses and other preparation tools that are available to assist applicants in preparing for the examinations. The information on the bridging programs includes links to optional programs that are available to provide supports that applicants may find helpful in bridging their international training and experience with the practice of the profession in Ontario. The other resources listed on the page provide links to occupation specific language training courses that are offered at no cost to newcomers to Ontario and information on access to The Michener Institute of Education at UHN Learning Resource Centre and HealthForceOntario.

Q8

Changes to internal review or appeal process

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes to the internal review or appeal processes in the reporting period.

Q9

Access by applicants to their records

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes to the process for applicants to request access their records. It is noted however that since the application process has moved to an electronic process, where no paper documents are provided by applicants, that applicants are uploading electronic versions of their documents, and the CMRITO therefore does not have hard copies of any documents provided by the applicant. The alternatives the CMRITO has developed to validate documents, including asking applicants to upload photographs of original documents to prove authenticity, has been beneficial to applicants.

Q10

Mutual recognition agreements

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes to the processes for recognition of qualifications for applicants who apply for a certificate of registration under the labor mobility provisions of the Canada Free Trade Agreement.

Q11

Training and resources for staff regarding registration

Yes,

Description of change/improvement that would impact fair registration outcomes:

Registration staff received training on the registration requirements and internal processes to prepare an application for evaluation by the Registration Committee. Registration staff also attended training on the Regulated Health Professions Act , 1991(RHPA) legislative framework and the Health Professions Regulators of Ontario (HPRO) governance training for RHPA colleges. Ensuring that everyone involved in the registration process is educated about the registration requirements and understands the established processes and procedures, helps to ensure compliance with our legislated responsibilities. In this manner the CMRITO ensures that the registration processes are transparent, objective, impartial and fair for all applicants.

Q12

Relationship with third party service provider(s)

No,

Description of change/improvement that would impact fair registration outcomes:

There have been no changes to the relationships and contracts that are in place with third party service providers in the reporting period.

Q13

Accreditation of educational programs

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

There have been no changes to the processes that have been established for the accreditation and approval of educational programs in medical radiation and imaging technology in Ontario in this reporting period.

Q14

Technological or digital improvements

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

There have been no significant changes to the technological improvements that were made to CMRITO systems in 2020 in response to the pandemic. The changes that were made at that time have continued in 2021. The CMRITO Council has approved the Canadian Association of Medical Radiation Technologists (CAMRT) examinations in each of the four specialties of radiography, nuclear medicine, radiation therapy and magnetic resonance, and the Sonography Canada examinations in the specialty of diagnostic medical sonography, as the approved examinations for the purpose of meeting the examination requirements of the Registration Regulation. The CMRITO has agreements with the CAMRT and Sonography Canada providing access to these examinations for applicants approved by the CMRITO and for applicants who have completed CMRITO approved educational programs. Both the CAMRT's and Sonography Canada's competency-based, on-line examinations are administered by Yardstick Assessment Strategies (YAS) and use psychometric tools to ensure that the examination is defensible and that successful applicants are competent to practise the profession safely. Both the CAMRT and Sonography Canada have continued in 2021 to provide access to their examinations using a secure remote proctoring delivery model that permits applicants to write the on-line examination in their own homes rather than at an examination centre. This has greatly improved access for applicants who have not transitioned to Canada as they are able to write these examinations from their home countries.

Q15

Anti-racism and inclusion-based policies and practices

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

The CMRITO is a regulator that is committed to the values of integrity, respect, and trustworthiness and ensuring transparency, professionalism, and equity, diversity and inclusion in its assessment and registration processes. These values shape our organizational culture and are the basis of our decision-making and actions. In December 2021, the CMRITO Council completed its strategic planning activities for the organization's 2022 – 2024 Strategic Plan. As part of this plan, diversity, equity and inclusion is now part of the CMRITO's vision and values, as well as the first of three strategic goals. With respect to this goal, CMRITO will "actively monitor, evaluate and apply evolving regulatory practices to enhance public protection" by "reviewing [CMRITO's] existing programs and practices to ensure they support equity, diversity and inclusion." The CMRITO has implemented several measures to ensure objectivity in the registration practices and systems and identify potential sources of bias in the assessment or decision-making processes. Both external and internal legal counsel provide orientation to Committee members on various topics, such as the decision-making parameters set out in legislation and how human rights law interacts with Registration Committee decision-making. The registration requirements are defined in policies and procedures and are objective and have measurable criteria. Decision-makers consistently apply registration requirement criteria, policies and procedures to all applicants. Members of the Registration Committee are fully oriented to the criteria, policies and procedures utilized by the Committee and orientation is ongoing. Over time, the Committee has developed its own guidelines and tools to ensure that requirements are applied consistently and there are documented guidelines and tools that decision-makers use. Decision-makers consider previous registration decisions made in similar cases for consistency and there are internal processes to monitor consistency and accuracy in decision-making and the outcomes of those actions. The CMRITO has also developed systems to identify potential sources of bias and employs strategies to address bias and enable neutrality. The working documents that are used by the Registration Committee for the assessment of each application define specific objective criteria that are used as the basis of the assessment of each application. By using criteria that are measurable and defined and not based on any objective perceptions, the risk of introducing bias is greatly reduced. The CMRITO has implemented measures to achieve impartiality in its registration decisions and has taken steps to help ensure decision-makers identify sources

of potential bias and strategies to avoid and mitigate situations of bias from the registration processes. These include clearly defining procedures to follow if bias is identified and using group deliberation and consensus strategies to come to decisions.

Q16 Organizational structure	**Yes,** Description of Change/Improvement that would impact Fair Registration Outcomes: The CMRITO has experienced a significant increase in the volume of international applicants applying for registration in 2021. Despite process and technology improvements that have been implemented to improve efficiency, the CMRITO determined that additional staffing resources were necessary to manage the increased volumes. Recruitment for the new staff position commenced in 2022.
Q17 Contingency or continuity of operations plans	**No,** Description of Change/Improvement that would impact Fair Registration Outcomes: There have been no changes to the contingency and continuity of operations plan in 2021. The CMRITO has continued to deliver all the services in each program area in a virtual delivery model. The Council and statutory committees have continued to meet virtually to discharge their legislated obligations. The information technology processes and safeguards to protect CMRITO systems have continued to be improved in 2021 with the introduction of additional authentication processes for CMRITO staff to access systems, and increased and improved training for staff on cybersecurity.

Q18

Documentation requirements for registration

No,

Description of Change/Improvement that would impact Fair Registration Outcomes:

There have been no changes in the documentation requirements for registration in the reporting period. In 2020, CMRITO expanded the use of credential evaluation reports that applicants had already completed through credentialing agencies such as WES, ICAS or the Medical Council of Canada, for the authentication and validation of program documents from organizations where applicants had completed their education. This practice has continued in 2021. As a result of the worldwide pandemic, options such as meeting with CMRITO staff to view original documentation or mailing of notarized copies were no longer possible. As original or notarized copies were no longer being accepted the CMRITO amended this process. As the secure document management website that is available to applicants applying for registration can accept files in a variety of formats, applicants are requested to scan their original or notarized documents and upload them. Applicants are also able to take images and photographs of their original documents and upload them to the secure site. Registration staff then validate the authenticity of the documents. Should any concerns be identified with any documents, applicants are requested to provide credential evaluation reports in addition to providing the scanned documents or images of the originals. In the event of further concerns, credentialing agencies such a WES or ICAS would be approached to assist. Where official documentation is not available, the CMRITO has continued to consider alternatives including personal declarations, sworn statements and confirmations and validations from former colleagues or supervisors.

Q19

English / French language proficiency testing

Yes,

Description of Change/Improvement that would impact Fair Registration Outcomes:

There have been no changes to the language proficiency testing options that are available to applicants in 2021 but the expanded options that were made available in 2020 have continued to be approved for use. The CMRITO has a range of language fluency testing options that are available to applicants including: 1. Providing proof that an applicant's professional training was completed in English or French 2. Providing proof of completion of one of the following: • the internet-based (iBT) TOEFL (Test of English as a Foreign Language) with a minimum total score of 73, and a minimum score of 21 in speaking; or • the paper-based TOEFL with a minimum score of 500, and TSE with a minimum score of 40; or • the IELTS (International English Language Testing System) test – academic (AC) with a minimum overall score of 6 and a minimum score of 6 in speaking; or • the IELTS (International English Language Testing System) test – general training (GT) with a minimum overall score of 6 and a minimum score of 6 in speaking; or • the MELA (Michener English Language Assessment) test with a minimum score of 8 in each of reading, listening and speaking and a minimum score of 7 in writing. In 2020, the Registration Committee also approved the use of two additional language test options. These additional options have been continued to be available to applicants who are required to demonstrate their language fluency in English. 1. The Registration Committee approved the use of the IELTS indicator test. This language assessment test can be taken remotely from an applicant's home. The test includes four skills – Listening, Reading, Writing and Speaking and the same required test scores approved on the IELTS Academic and General Training tests have been approved for this test. 2. The Registration Committee also approved the use of the TOEFL iBT Home Edition of the TOEFL test. The test is identical in content, format and on-screen experience to a test taken at a test center and is taken on an applicant's computer at home and monitored by a human proctor online through ProctorU®.

Q20

Section 2 – If applicable, please list your organization's top three accomplishments during the reporting period that relate to fair registration practices.

1 **The CMRITO through operational efficiencies and expanded use of technology has been able to process an increased volume of applications for registration within the published timelines.**

2 **The CMRITO has improved the document management and validation processes that have expedited the application process for applicants, while still maintaining the integrity of the document validation processes.**

3 **The process for the Registration Committee to complete an assessment of the documentation submitted by an applicant to support their applications for registration has been streamlined to an online review process using the Microsoft Teams platform. These changes have resulted in increased efficiency and effectiveness of the panel.**

Q21

Section 3 – If applicable, please list the top three risks that impacted your organization's ability to achieve better registration outcomes for applicants during the reporting period. Please also indicate the measures you have taken to mitigate the impacts of these risks.

1 **Organizational Capacity - the CMRITO recognized that the increased volume of applications would require additional staffing resources to manage. Accordingly, approval was obtained for an increase in the staffing complement which was filled in 2022.**

2 **Since Council formalized the principles of diversity, equity and inclusion into its 2022-2024 Strategic Plan, the College is performing a review of all its policies and processes through this lens. This work will continue in 2022**

Q22

Section 4 – Do you believe that you have a Canadian Experience Requirement (CER)? If so, please describe the applicant competencies that you seek to develop through this requirement in the comment box below CER: work experience or experiential training obtained in Canada.

No,

Other (please specify):
The CMRITO does not require Canadian experience in medical radiation and imaging technology for registration. Applicants applying for registration can provide evidence of their competence to practise from their home countries.

Q23

QUANTITATIVE SECTION The following quantitative 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. Languages Indicate the languages in which you make available application materials and information about the application process.

English ,

French,

Other (please specify):

Note: The French version of application materials and information are not available on the website. Translation of information about the application process into French is completed as needed using external translation services.

Q24

Membership Data Demographics Data As of December 31, 2021, please indicate the number of members in each gender category identified below and the number of total members.

Total Male	**2532**
Total Female	**8637**
Total Non-binary	**0**
Gender not provided	**5**
Overall Total	**11174**

Q25

In relation to your members: Do you collect race-based data?

No

Q26

Do you collect other identity-based or demographics data?

No

Q27

Do you plan to collect race-based data in the future?

No

Q28

Class of License/Certificate Data As of December 31, of the reporting year, please indicate the number of members under each class or license category as applicable.

Full/Independent Practice	**11174**
Overall Total	**11174**

Q29

Jurisdiction where members were initially trainedAs of December 31, of the reporting year, please indicate the membership type and total number of registered members for each category listed below.

Ontario	**9741**
Other Canadian Provinces and Territories	**523**
USA	**0**
Other Countries	**910**
Multiple and/or Unspecified Jurisdiction	**0**
Total	**11174**

Q30

Please indicate the total number of registered members for the top 12 international countries or jurisdictions where these individuals obtained their initial education in the profession or trade.

1   **0**

Q31

Applications Data Demographics Data Indicate the number of applicants who filed an application between January 1 and December 31 of the reporting year, in each applicable category.

Total Male	**207**
Total Female	**604**
Total Non-binary	**0**
Gender not provided	**1**
Overall Total	**812**

Q32

In relation to the applications, you received:Do you collect race-based data?

No

Q33

Do you collect other identity-based or demographics data?

No

Q34

Category of Applicants Number of applicants who voluntarily or involuntarily (through inactive and lapsed applications) withdrew from the application process between January 1 and December 31, 2021:

88

Q35

Please indicate the total number of applicants from Ontario who filed an application between January 1 and December 31, 2021 for the following categories as applicable.

Number of Applicants	**574**
Number of Applicants Licensed/Certified	**465**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**12**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q36

Please indicate the total number of applicants from Canadian provinces and territories (excluding Ontario) who filed an application between January 1 and December 31, 2021 for each of the following categories as applicable.

Number of applicants	**43**
Number of applicants fully licensed/certified	**39**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**2**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q37

Please indicate the total number of certificate-to-certificate (labour mobility) applicants who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	**14**
Number of applicants fully licensed/certified	**12**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**2**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q38

Please indicate the total number of applicants from international jurisdictions (not including USA) who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	**186**
Number of applicants fully licensed/certified	**14**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**16**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q39

Please indicate the total number of applicants from multiple and/or jurisdictions not specified who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	**9**
Number of applicants fully licensed/certified	**3**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**16**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q40

Please indicate the total number of applicants from accredited Canadian post-secondary institutions who filed an application between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	**603**
Number of applicants fully licensed/certified	**492**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**10**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**1**

Q41

Please indicate the total number of applicants who re-registered after withdrawing from the application process between January 1 and December 31, 2021 for each of the categories as applicable.

Number of applicants	**1**
Number of applicants fully licensed/certified	**0**
Average Time to Process Application in Weeks from First Point of Applicant Contact	**32**
Average Time to Process Application in Weeks from Receipt of all Required Documents	**0**

Q42

Please provide any additional comments you may have for questions 33-41.

Question 30 - The country of training information has not been tracked in the CMRITO system for all members - the value in Question 30 has been entered as not available (N/A).

Q43

Jurisdiction where applicants obtained their initial educationPlease indicate the total number of applicants for the top 12 international countries or jurisdiction where applicants obtained their initial education in the profession or trade.

1	**Pakistan 47**
2	**Iran 39**
3	**India 27**
4	**Philippines 12**
5	**USA 9**
6	**China 6**
7	**Australia 4**
8	**Bangladesh 4**
9	**Iraq 4**
10	**Lebanon 4**
11	**Afghanistan 3**
12	**Egypt 3**

Q44

Processing Time As of December 31, 2021, how many full licenses/certificates did your organization issue?

613

Q45

Please indicate the total number of applicants who received full licensure/certification between January 1 and December 31, 2021, according to the following timelines.

0 – less than 3 months	**157**
3 months – less than 6 months	**101**
6 months – less than 12 months	**177**
12 months – less than 18 months	**72**
18 months – less than 24 months	**26**
24 months and greater	**80**

Q46

Age of Active Applications As of December 31, 2021 what were the total number of active applications in your case inventory?

767

Q47

Please provide a breakdown (and total) of active applications according to the length of time (age) that they have been open.

0 – less than 3 months	**146**
3 months – less than 6 months	**55**
6 months – less than 12 months	**84**
12 months – less than 18 months	**58**
18 months – less than 24 months	**43**
24 months and greater	**381**
TOTAL	**767**

Q48

Other Licenses/Certificates of Registration ProcessedPlease indicate the number of applicants who were issued an alternative class of license* that your organization processed in the reporting year (January 1-December 31, 2021).Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.* An alternative class of license/certificate enables the holder to practice with limitations, but additional requirements must be met for the member to be fully licensed/certified.

Ontario	**0**
Other Canadian Provinces and Territories	**0**
Certificate to Certificate (Labour Mobility)	**0**
USA	**0**
Other International	**0**
Multiple and/or Unspecified Jurisdictions	**0**
TOTAL	**0**

Q49

Other Licenses/Certificates of Registration ProcessedPlease indicate the number of applications, If applicable, who were issued an emergency license/certificate that your organization processed in the reporting year (January 1-December 31, 2021). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	**0**
Other Canadian Provinces and Territories	**0**
Certificate to Certificate (Labour Mobility)	**0**
USA	**0**
Other International	**0**
Multiple and/or Unspecified Jurisdictions	**0**
TOTAL	**0**

Q50

Other Licenses/Certificates of Registration ProcessedPlease indicate the number of Provisional license/certificate or alternative class of license/certificate holders who were fully licensed/certified by your organization which were processed in the reporting year (January 1-December 31, 2021). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	**0**
Other Canadian Provinces and Territories	**0**
Certificate to Certificate (Labour Mobility)	**0**
USA	**0**
Other International	**0**
Multiple and/or Unspecified Jurisdictions	**0**
TOTAL	**0**

Q51

Number of Reviews and Appeals Processed State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2021). For applicants who were subject to an internal review or who were referred to a statutory committee of your governing council, such as a Registration Committee. Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	3
Other Canadian Provinces	1
USA	7
OtherCountries	155
Multiple and/or Unspecified Countries	0
TOTAL	166

Q52

State the number of reviews and appeals that your organization processed in the reporting year (January 1-December 31, 2021). For applicants who initiated an appeal of a registration decision. Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	0
USA	0
OtherCountries	1
Multiple and/or Unspecified Countries	0
TOTAL	1

Q53

State the number of reviews and appeals heard in the reporting year (January 1-December 31, 2021). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	0
USA	0
OtherCountries	1
Multiple and/or Unspecified Countries	0
TOTAL	1

Q54

State the number of registration decisions changed following an appeal and/or review that your organization processed in the reporting year (January 1-December 31, 2021). Enter the data by the jurisdiction where applicants were initially trained in the profession, i.e. before they were granted use of the protected title or professional designation in Ontario.

Ontario	0
Other Canadian Provinces	0
USA	0
OtherCountries	0
Multiple and/or Unspecified Countries	0
TOTAL	0

Q55

List the top three reason for appeals (by percentage) of a registration decision

1	**Appeals against completing the mandatory examination requirement -non- exemptible requirement in the registration regulation.**

Q56

List the top five reasons (by percentage) for not Issuing a License/Certification to Internationally Trained Individuals

| 1 | **Did not meet requirements for registration set out in the order from the CMRITO Registration Committee** |

Q57

List the top Five Reasons (by percentage) for not Issuing a License/Certification to Canadian Graduates

| 1 | **Did not successfully complete the exam(s) approved by Council** |
| 2 | **Did not register within five years of completing an approved program** |

Q58   **Respondent skipped this question**

Please provide any additional comments you may have: