



College of Medical Laboratory Technologists of Ontario's 2021 Fair Registration Practices Report Submissions

Each year, the Ontario Fairness Commissioner requests regulatory Colleges to provide their Fair Registration Practices (FRP) Report submissions. The report was created as required in the:

- *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* (FARPACTA) s.20 and 23(1), for the regulated professions named in Schedule 1 of FARPACTA
- Health Professions Procedural Code set out in Schedule 2 of the *Regulated Health Professions Act, 1991* (RHPA) s. 22.7(1) and 22.9(1), for health colleges

The aim of the FRP report is:

- To collect data and information on individual regulators;
- To understand how a regulator has implemented fair registration practices during the reporting period; and,
- To help oversee compliance

Overseeing compliance requires, among other things, the following series of functions and activities:

- Monitoring
- Assessing
- Mitigating and/or enforcing
- Educating and promoting
- Reporting on progress

The first half of the FRP is intended to collect qualitative information to highlight a regulator's enhancements to improve fair registration practices year over year. The second half is to collect quantitative data 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.

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

College of Medical Laboratory Technologists of Ontario
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Section 1

During the reporting period (January 1 – December 31, 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.

2. Registration requirements either through regulation, by-law or policy.

Yes

Description of change/improvement that would impact fair registration outcomes: The CMLTO Registration Committee approved a policy requiring all applicants to provide a Criminal Records and Judicial Matters Check as part of their supporting documentation during the application process. The new requirement took effect on January 1, 2021.

3. New or consolidated class of certificates or license

No



4. Assessment of qualifications

Yes

Description of change/improvement that would impact fair registration outcomes: Submission of Criminal Records and Judicial Matters Check was added to the CMLTO registration requirements as of January 1, 2021.

5. Timelines for registration, decisions and/or responses

No

6. Registration and assessment fees

No

7. Resources for applicants

Yes

Description of change/improvement that would impact fair registration outcomes: Webinars regarding the Canadian-educated and Internationally educated registration processes were published on the CMLTO website. The CMLTO Registration Committee Policy 03 – Language Fluency Requirements was posted on the CMLTO's website and made publicly available.

8. Changes to internal review or appeal process

No



9. Access by applicants to their records

No

10. Mutual recognition agreements

No

11. Training and resources for staff regarding registration

Yes

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

- The annual orientation for Registration Committee members included:
 - The Committee's legislative framework,
 - An introduction to the Canadian Society for Medical Laboratory Sciences Prior Learning Assessment and Certification Examination processes,
 - An introduction to the Ontario Office of the Fairness Commissioner, and
 - An overview of the Voluntary Roster program.
- The Registration Committee was introduced to risk-based decision-making concepts and frameworks in 2021. The concepts and draft frameworks embedded best practices from the United Kingdom's right-touch regulation model. The risk-based frameworks are to be used by the Registration committee when assessing application cases to ensure fair and consistent decision making.
- Staff completed annual CMLTO orientation including reviewing the Human Resources manual. Additionally, the Registration department training materials were updated to support the onboarding of a new staff member.



12. Relationship with third party service provider (s)

No

13. Accreditation of educational programs

Yes

Description of change/improvement that would impact fair registration outcomes: In 2021, Anderson College's Medical Laboratory Science Program was registered to be accredited by Accreditation Canada. Once accredited, graduates will satisfy the registration requirement for relevant education as outlined in Ontario Regulation 207/94 under the *Medical Laboratory Technology Act, 1991*. The final accreditation process will occur when their first cohort graduates (expected February 2023).

14. Technological or digital improvements

No

15. Anti-racism and inclusion-based policies and practices

Yes

Description of change/improvement that would impact fair registration outcomes: In response to the inclusion-based practices, the CMLTO removed all gender/sex designations from external and internal documentation (i.e., letter of standing and email communication with registrant/public).



16. Organizational structure

Yes

Description of change/improvement that would impact fair registration outcomes: A new Professional Practice Associate who supports the Registration Department was hired and provided orientation in 2021.

17. Contingency or continuity of operations plans

Yes

Description of change/improvement that would impact fair registration outcomes: In response to the COVID-19 pandemic, the CMLTO updated the business continuity plan (BCP) to ensure that the CMLTO can perform essential services in case of disruption and disturbance. The new CMLTO COVID-19 Safety Plan and Remote Work Policy was implemented to provide a framework to normalize business functions.

18. Documentation requirements for registration

Yes

Description of change/improvement that would impact fair registration outcomes: Effective January 1, 2021, applications require a Criminal Records and Judicial Matters Check to be completed within the preceding six months and submitted as a part of their supporting documentation. The submission of a Criminal Records and Judicial Matters Check assists the College in its determination about an applicant's suitability to practice in the profession.



19. English/French language proficiency testing

No

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

- i. Implementation of Criminal Record and Judicial Matters Check to examine applicants' suitability to practise.
- ii. In September 2021, two publicly available webinars were posted on the CMLTO's website regarding the registration requirements for Canadian and Internationally educated applicants.
- iii. Held a preliminary discussion and orientation session for the Registration Committee and staff regarding risk-based decision-making framework.

21. 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.

- i. The College noticed applicants experiencing delays in getting necessary supporting documentation (i.e., criminal record check, writing language exam on time) due to the pandemic. The College continued to accommodate applicants by indefinitely holding their applications until all requirements were met and processing applications in a timely manner. In a few cases, the College requested applicants to sign an Acknowledgement and Undertaking for those who experienced accessibility issues in writing language exams, as needed. These enabled applicants to practice while providing sufficient time for them to gather or complete the necessary steps.
- ii. Translation into French – It is important for the College that the public, applicants, and registrants have access to French language services when requested. The College is continuing to create and publish



publicly available information in French. In 2021, the College completed all planned translation projects. The College continues to take a measured and meaningful approach in translating existing and newly created documents, resources, etc.

- iii. Justice, Diversity, Equity, Inclusion, and Decolonization model – as the College promotes inclusion-based principles, efforts were made to improve policies and update publicly available information. CMLTO continues its work with the Health Profession Regulators of Ontario to identify and develop frameworks, strategies, and policies to support statutory Committee members (i.e., Registration Committee members) and staff with relevant training sessions.

22. Section 4 - Do you believe that you have a Canadian Experience Requirements (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. The CMLTO does not have any Canadian experience registration requirements.

23. 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

Comment: French resources include general application information, supporting documentation guideline, Registration Committee decision making process information. The CMLTO is currently investigating ways to translate further registration resources into French.

24. 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	1449
Total Female	5458
Total Non-binary	
Gender not provided	27
Overall Total	6934

25. In relation to your members **Do you collect race-based data?**

No



26. Do you collect other identity-based or demographic data?

Yes

Please specify: Age/Date of birth, Title, Address, Electoral District, Sex, Citizenship, Preferred language, Secondary and tertiary spoken languages, Country of initial education/training, Work History

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

No

Comment: Potentially at a future date.

28. 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	6445
Provisional/Limited license/certificate	
Emergency License/Certificate	
All other classes	489 (Non-practising)
Total	6934



29. Jurisdiction where members were initially trained

As of December 31, of the reporting year, please indicate the membership type and total number of registered members for each category listed below

Ontario	5135
Other Canadian Provinces and Territories	430
USA	32
Other Countries	1023
Multiple and/or Unspecified Jurisdiction	314
Total	6934

30. 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. Philippines	353
2. India	245
3. Iran	59
4. USA	32
5. China	29
6. Pakistan	27
7. Hong Kong	24
8. Nigeria	22
9. United Kingdom	17
10. Egypt	17
11. Jamaica	16
12. Sri Lanka	13



31. Application 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	80
Total Female	223
Total Non-binary	
Gender not provided	4
Overall	307

32. In relation to the applications, you received:

Do you collect race-based data?

No

33. Do you collect other identify-based or demographics data?

Yes.

If yes, please indicate the type: Age/Date of birth, Title, Address, Electoral District, Sex, Citizenship, Preferred language, Secondary and tertiary spoken languages, Country of initial education/training, Work History.

34. 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

1

35. 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	216
Number of Applicants licensed/certified	216
Average time to process application in weeks from first point of applicant contact	42
Average time to process application in weeks from receipt of all required documents	10

36. 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	14
Number of Applicants licensed/certified	14



Average time to process application in weeks from first point of applicant contact	42
Average time to process application in weeks from receipt of all required documents	10

37. 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	34
Number of Applicants licensed/certified	33
Average time to process application in weeks from first point of applicant contact	42
Average time to process application in weeks from receipt of all required documents	12

38. 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 categories as applicable:

Number of Applicants	43
Number of Applicants licensed/certified	43
Average time to process application in weeks from first point of applicant contact	56
Average time to process application in weeks from receipt of all required documents	12

39. 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	0
Number of Applicants licensed/certified	0
Average time to process application in weeks from first point of applicant contact	n/a
Average time to process application in weeks from	n/a

receipt of all required documents	
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40. 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	230
Number of Applicants licensed/certified	230
Average time to process application in weeks from first point of applicant contact	42
Average time to process application in weeks from receipt of all required documents	10

41. 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	0
Number of Applicants licensed/certified	0



Average time to process application in weeks from first point of applicant contact	n/a
Average time to process application in weeks from receipt of all required documents	n/a

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

“Average time to process application in weeks from first point of applicant contact” was interpreted as the turnaround time from when the applicant submits their online application. Applicants are required to submit their supporting documents after completing the online application. Applicants must submit their supporting documents within 35 days from the date they submit their online application.

“Average time to process application in weeks from receipt of all required documents” was interpreted as the turnaround time from when an applicant submits both the completed online application and all required supporting documents.

#36. “Applicants from Canadian provinces and territories (excluding Ontario)” was interpreted as number of applicants who are Canadian-educated outside of Ontario. This number does not include labour-mobility applicants.



43. Jurisdiction where applicants obtained their initial education.

Please 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. Philippines	10
2. India	10
3. Sudan	4
4. Eritrea	2
5. Iran	2
6. Nigeria	2
7. Sri Lanka	1
8. Pakistan	1
9. Nepal	1
10. Lebanon	1
11. Ireland	1
12. Guyana	1

44. Processing Time

As of December 31, 2021, how many full licenses/certificate did you organization issue?

In total there were 307 applications made in 2021. Of those, 305 were processed, approved, and paid their prorated registration fee in 2021.



45. 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	305
3 month – less than 6 months	
6 months – less than 12 months	
12 months – less than 18 months	
18 months – less than 24 months	
24 months and greater	

46. Age of Active Applications

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

19

47. 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	17
3 month – less than 6 months	2
6 months – less than 12 months	



12 months – less than 18 months	
18 months – less than 24 months	
24 months and greater	
Total	19

48. Other Licenses/Certificates of Registration Processed.

Please indicated 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 alternate 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



49. Other Licenses/Certificates of Registration Processed

Please indicate the number of applications, if applicable, who were issued an emergency licensure/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 of 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

50. Other Licenses/Certificates of Registration Processed

Please 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 of professional designation in Ontario.

Ontario	0
Other Canadian Provinces and Territories	0
Certificate to Certificate (Labour Mobility)	0
USA	0
Other International	3
Multiple and/or Unspecified Jurisdictions	0
Total	3

51. 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	0
Other Canadian Provinces and Territories	0



Certificate to Certificate (Labour Mobility)	0
USA	0
Other International	1
Multiple and/or Unspecified Jurisdictions	0
Total	1

52. 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 and Territories	0
Certificate to Certificate (Labour Mobility)	0
USA	0
Other International	1
Multiple and/or Unspecified Jurisdictions	0
Total	1



53. 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 and Territories	0
Certificate to Certificate (Labour Mobility)	0
USA	0
Other International	1
Multiple and/or Unspecified Jurisdictions	
Total	1

54. 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 and Territories	0



Certificate to Certificate (Labour Mobility)	0
USA	0
Other International	0
Multiple and/or Unspecified Jurisdictions	0
Total	0

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

The CMLTO had 1 international-trained applicant whose application was denied in 2020. The applicant applied for an internal appeal in 2021. The Panel for the internal appeal agreed to the initial application decision as the applicant did not meet the CMLTO registration requirements: education and training, examination, and experience or active engagement.

56. List the top five reasons (by percentage) for not issuing a license/certification to internationally trained individuals

The CMLTO had 1 international-trained applicant whose application was denied. They did not meet the CMLTO registration requirements: education and training, examination, and experience or active engagement.

57. List the top five reasons (by percentage) for not issuing a license/certification to Canadian Graduates

All Canadian graduates were issued a license.



58. Please provide any additional comments you may have:

#43. There were other countries with 1 applicant each. These included Bangladesh, Belgium, and South Korea.