

College of MEDICAL LABORATORY
TECHNOLOGISTS of Ontario
2023 Fair Registration Practices Report

Prepared for the Office of the Fairness Commissioner (OFC)



FAIRNESS COMMISSIONER
COMMISSAIRE À L'ÉQUITÉ

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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 MEDICAL LABORATORY TECHNOLOGISTS of Ontario
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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 MEDICAL LABORATORY TECHNOLOGISTS of Ontario

Licensing requirements (brief description for each requirement listed):

Profession/ Trade Name	Medical Laboratory Technologist
Academic requirement	a) successful completion of a Health Standards Organization (HSO) accredited medical laboratory technology education program OR, b) education equivalency according to the Canadian Society for Medical Laboratory Science (CSMLS) Prior Learning Assessment (PLA) OR, c) possession of a baccalaureate degree from a Canadian university, whose major course content, both lecture and practical, is relevant to medical laboratory technology, and which is approved by the Registration Committee OR, d) possession of education or a mixture of education and experience which is considered by the Registration Committee to be equivalent to that which is described in a), b), and c).

<p>Experience requirement</p>	<p>a) have been actively engaged (used your knowledge, skill and judgement as an MLT) in the practice of medical laboratory technology during the three years immediately preceding the date of the application OR, b) have successfully completed refresher courses approved by the CMLTO within the three years preceding the date of the application. NOTE: active engagement requirements are detailed in the CMLTO Registration Committee Policy 13: Active Engagement which is available on our website (http://cmlto.com/images/stories/Members/rc_13_2023_eng.pdf)</p>
<p>Language requirement</p>	<p>a) Successful completion of a medical laboratory science program accredited by the Health Standards Organization (HSO) (or its predecessor, the Canadian Medical Association conjoint accreditation services) OR b) Submission of proof acceptable to the Registrar (e.g., transcript that states language of instruction) that either: (a) both high school and medical laboratory science program (that was not accredited by the HSO or its predecessor) that included theoretical/academic coursework and a clinical placement, was completed in English or French; or (b) that both high school and undergraduate degree that included theoretical/academic course work and a clinical placement/practicum/internship was completed in English or French; OR c) Submission of published academic paper(s) (e.g., thesis, research publications) authored by the applicant as part of a Masters or Doctorate program successfully completed by the applicant with an accompanying letter of verification acceptable to the Registrar from the principal investigator, a program professor, or supervisor stating English or French was the language of instruction and the language in which the academic paper was written; OR d) Achievement of the minimum scores outlined in one of the Registration Committee (RC) approved language fluency tests within the past two years. NOTE: language requirements are detailed in the CMLTO Registration Committee Policy 03: Language Fluency Requirements which is available on our website (http://cmlto.com/images/stories/Applicants/language_policy_rc.pdf)</p>

<p>Additional information on licensing requirements (may include links to appropriate page on regulator website):</p>	<p>1. must be a Canadian citizen, a permanent resident of Canada, or have an authorization under the Immigration and Refugee Protection Act (Canada) 2. submit a cleared Criminal Record and Judicial Matters Check within the six months preceding application. (Registration Committee Policy 16: Background Check of Applicants - http://cmlto.com/images/stories/Applicants/rc_16_background_check.pdf) 3. successful completion of Canadian Society for Medical Laboratory Science (CSMLS) certification exam (formerly CSLT) 4. If labour mobility applicant, submission of a letter of standing from a Canadian regulatory body in which the applicant has current registration equivalent to the registration class seeking in CMLTO. NOTE: For more information, please refer to the CMLTO Registration Committee Policy 11: Alternative Documents for Registration which is available on our website (http://cmlto.com/images/stories/Applicants/rc_11_eng.pdf)</p>

4. Third party assessments

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

Organization name	Function
Canadian Society for Medical Laboratory Science	Competency-based assessment

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 MEDICAL LABORATORY TECHNOLOGISTS of Ontario takes the following measure(s) to ensure fair and timely assessments:

Canadian Society for Medical Laboratory Science (CSMLS) administers Prior Learning Assessment (PLA) processes for applicants and administers the national entry-to-practise examination under third-party contract arrangements. The

CMLTO diligently ensures the implementation of fair and timely processes by conducting periodic evaluations of CSMLS services in adherence to the terms of the contract. Comprehensive reports detailing the processes and outcome measures of PLA and examinations are routinely reviewed by the CMLTO. Additionally, the Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR) has created an audit framework for PLA and examinations provided by CSMLS. NOTE: Function selection for the organization only allowed one selection, however, the CSMLS provides both Prior Learning Assessment and examination.

5. Accomplishments, risks and mitigations

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

A. Accomplishments

1	1. Implemented Emergency Registration as per Bill 106 - Pandemic and Emergency Preparedness Act, 2022 2. Implemented As of Right Registration as per Bill 60 - Your Health Act, 2023.
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B. Risks and Mitigations

Risk	Mitigation Measure
When Non-practising registrants apply for a Practising certificate of registration, they must fulfill an active engagement requirement. Historically, this requirement was met through the self-reporting of practice hours during annual renewal. However, relying solely on self-reported practice hours poses a risk as this information is not independently verified.	In 2023, the CMLTO addressed this risk by requiring all registrants applying for a change in class to Practising to submit authentic documents, such as confirmation of employment letters which demonstrate their recent MLT practice records.

<p>The CMLTO has observed challenges faced by applicants residing outside of Ontario or specific regions within Ontario during the application process, particularly in obtaining Criminal Record and Judicial Matters Checks. Variations exist in police screening levels between regions outside of Ontario and within certain areas of the province. Moreover, delays in the application process may occur due to procedural issues in specific regions within Ontario.</p>	<p>The CMLTO conducted an investigation into Sterling Backcheck's Enhanced Police Information Check (EPIC) to verify its equivalence to the Criminal Record and Judicial Matters Check required from applicants. Upon confirmation of its suitability, we provided a link to applicants who encountered difficulties accessing local police services for document procurement. This initiative aimed to streamline and expedite the application process efficiently.</p>
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6. Changes to registration practices

During the January 1 to December 31, 2023 reporting period, College of MEDICAL LABORATORY TECHNOLOGISTS 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	To align with the new Emergency certificate of registration and As of Right applicants, the Board approved updates to legislative provisions and CMLTO By-Law.

New or consolidated class of certificates or licenses	Yes	1. Emergency Certificate of Registration is available to applicants in alignment with Ontario Regulation 207/94. 2. As of Right Registration is available to applicants who are registered and able to practise in another regulated Canadian jurisdiction.
Assessment of qualifications , including competency-based assessments and examinations	No	
Documentation requirements for registration	Yes	Non-practising registrants are required to provide supporting documents such as a) Medical Laboratory Science clinical placement in the preceding three years proven through submission of an HSO-accredited program degree/diploma OR, b) Employment letter(s) with employer address, job title, list of duties performed, practice hours, and dates employed demonstrating the applicant was engaged as a medical laboratory technologist in the three years preceding their application OR, c) Successful completion of refresher courses approved by the CMLTO within the three years preceding their application. NOTE: Detailed information is available through the Registration Committee Policy 09: Changing Class of Registration (http://cmlto.com/images/stories/Members/rc_09_english_2023.pdf)
Timelines for registration, decisions and/or responses	Yes	Internal timelines have been monitored, recorded, and optimized. The CMLTO turnaround time target for applications is 21 days. In 2023, the average turnaround time was 5.26 through various process improvement initiatives.

Registration and/or assessment fees	No	
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 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
Resources or training to support applicants to move through the licensing process	Yes	The Registration Committee received orientation sessions aimed at enhancing their ability to conduct thorough and unbiased reviews of registration cases. The training incorporated key concepts and draft frameworks derived from the best practices observed in the United Kingdom's right-touch regulation model. These risk-based frameworks are designed to guide the Registration Committee in their assessment of

		application cases, thereby promoting equitable and consistent decision-making processes.
Anti-racism and inclusion-based policies and practices	Yes	All CMLTO staff members engaged in an Equity, Diversity, and Inclusion (EDI) Workshop. The training covered various topics, with a particular focus on addressing unconscious bias. Staff members were briefed on decision-making processes within the framework of EDI awareness and were equipped with supplementary resources for further review.

C. System partners

Registration process	Changes Made (Yes / No)	Description
Steps to increase accountability of third-party service provider(s)	Yes	The Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR) has developed audit processes for CSMLS Prior Learning Assessment and examinations.
Accreditation of educational programs	Yes	In 2023, CMLTO staff actively engaged in meetings with the Superintendent of Private Career Colleges. The purpose of these meetings was to gain insight into the profession-specific accreditation processes and program approvals.
Mutual recognition agreements	No	

D. Responsiveness to changes in the regulatory environment

Registration process	Changes Made (Yes / No)	Description
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Emergency registration plans	Yes	Implemented Emergency Registration as per Bill 106 - Pandemic and Emergency Preparedness Act, 2022
Technological or digital improvements	Yes	At the conclusion of each annual renewal cycle, all feedback received regarding the renewal process undergoes review to identify opportunities for process enhancements and to mitigate any technical challenges encountered. Similarly, each year, feedback gathered from the application process survey is examined and necessary improvements are made to ensure that the registration process remains fair, efficient, and timely.
Steps to address labour shortages in the profession or trade	Yes	1. The CMLTO showcased a recent initiative led by the Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR), known as the Flexible Pathways to Registration for Medical Laboratory Technologists project. The goal of this project is to address the shortage of Medical Laboratory Technologists in Canada throughout the next ten years by increasing the availability of registered health professionals qualified to work in their respective fields. (http://cmlto.com/images/stories/Resources/professional_regulation_inthe_public_interest.pdf) 2. The CMLTO's Board also internally evaluated the College's role on responding to the HHR needs. 3. The CMLTO also hosted several different webinars to talk about alternate pathway for registration (http://www.cmlto.com/index.php?option=com_content&view=article&id=2101:upcoming-webinar-alternative-pathways-to-registration-as-an-mlt-&Itemid=637) 4. The CMLTO met with the Michener Institute of Education at UHN to identify opportunities for individuals who successfully complete a Biochemistry micro-credential program to apply for registration.
Other	Yes	1. The CMLTO conducted a Scope of Practice in 2023 for both Medical Laboratory Technologists and Medical Laboratory Technicians/Assistants to better understand the laboratory landscape in Ontario. 2. The CMLTO Board Ends Policy was updated in 2023 for 2024 - 2026/2027 with distinct focus on

		being responsive for HHR needs. (Ends Policy 3 – 3.2 Emerging health human resource trends impact future planning)
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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:

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B. Other identity-based or demographic data collected

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

Additional description:

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

C. Languages of service provision

College of MEDICAL LABORATORY TECHNOLOGISTS 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
Medical Laboratory Technologist	6928

Class of License	Total Number of Members	Total Number of Internationally Educated Members
Non-practising registration	561	
Practising registration	6367	

Gender	Number of Members
Male	1495
Female	5433
Other / not collected	

Jurisdiction of Initial Training	Number of Members
Ontario	4964
Other provinces and territories	426
United States	27
Other International	1027
Other/not collected	484

Country of Initial Training	Number of Members
Canada	5881
United States of America	27
Australia	3
Bahamas	1
Bangladesh	3
Barbados	1
Belarus	1
Belgium	1
Bosnia and Herzegovina	1
Cameroon	5
Chile	1
China	29
Colombia	9
Congo	1
Costa Rica	1
Egypt	16
Ecuador	1
Eritrea	2
Ethiopia	5
Finland	1
France	1
Ghana	1
Guyana	8
Hong Kong	21
India	256

Iran	62
Iraq	5
Ireland	1
Israel	1
Jamaica	14
Jordan	12
Kenya	1
Kuwait	4
Lebanon	11
Macedonia	1
Mauritius	4
Morocco	1
Nepal	10
Netherlands	1
New Zealand	2
Nigeria	26
Norway	1
Pakistan	26
Palestine State	5
Peru	1
Philippines	379
Poland	5
Portugal	2
Qatar	3
Romania	1
Russia	3
Saudi Arabia	1
Slovakia	1
South Africa	5
South Korea	6
Sri Lanka	11
Sudan	19
Sweden	2
Thailand	1
Trinidad and Tobago	1
Uganda	2
United Arab Emirates	2
United Kingdom	15

Venezuela	1
Yemen	1
Zimbabwe	1

Official language of preference	Number of Members
French	93
English	6835

Racial identity (optional)	Number of Members
Not collected	6928

E. Data Notes

NOTE: A.4 did not have "not collected" option. There are "484 not collected" and "7 countries not on the list" all included under "Canada". The real number of registrant for country of training as Canada is 5390 (5881-484-7=5390) *Taiwan is missing from the country list in A.4: the CMLTO has 2 registrants with education from Taiwan. * West Indies is missing from the country list in A.4: the CMLTO has 2 registrants with education from West Indies. * Yugoslavia (former country) is missing from the country list in A.4: the CMLTO has 2 registrants with education from Yugoslavia. * Rhodesia (former country) is missing from the country list in A.4: the CMLTO has 1 registrant with education from Rhodesia.

F. Applicant Profile

Profession Name	Total Number of Applicants
Medical Laboratory Technologist	303

Gender	Number of Applicants
Male	65
Female	238

Jurisdiction of Initial Training	Applications received in 2023	Applications with decisions pending
Ontario	214	2
Other International	58	7
United States	2	1
Other provinces and territories	29	2

Country of Initial Training	Number of Applicants
Canada	243
United States of America	2
Bahamas	1
Bangladesh	1
Cameroon	1
Egypt	1
Ethiopia	1
Ghana	1
Guyana	1
Hong Kong	1
India	12
Iran	3
Jamaica	1
Jordan	2
Kenya	1
Lebanon	1
Nepal	1
Philippines	20
Pakistan	1

South Korea	1
Sri Lanka	1
Sudan	4
Uganda	1
United Kingdom	1

Official language of preference	Number of Members
English	295
French	8

Racial identity (optional)	Number of Members
Not collected	303

G. Data Notes

The CMLTO is currently transitioning to a new platform in 2024. The online application in the new platform will include the collection of race-based data.

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	1	0	0
Other International	1	0	0
United States	0	0	0

Other provinces and territories	0	0	0
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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	246	60

J. Data Notes

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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	1	1

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	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. Additional proof of education and formal learnings related to MLT	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. No international trained applicants denied in 2023. Not	0

applicable for this year.	
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L. Data Notes

Not applicable

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 MEDICAL LABORATORY TECHNOLOGISTS of Ontario has made the following changes to comply with these new legal obligations:

A. Canadian Experience

Change required: No changes required

College of MEDICAL LABORATORY TECHNOLOGISTS 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).

B. Language Proficiency Testing

Change required: Yes

College of MEDICAL LABORATORY TECHNOLOGISTS 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:

Effective November 2022, internationally educated applicants can demonstrate their language fluency in a number of different ways based on the options provided in the updated Registration Committee Policy 03 – Language Fluency Requirements. The accepted language proficiency tests were updated to align with those listed in the Immigration, Refugees and Citizenship Canada (IRCC) Act. The most recent update to the language tests ensures matching government's acceptable tests. The CMLTO also reviewed the Canadian Alliance of Medical Laboratory Professionals Regulators (CAMLPR) language fluency research to ensure other accepted tests, scores, and ways to demonstrate fluency align with the medical laboratory sciences sector needs.

College of MEDICAL LABORATORY TECHNOLOGISTS 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

C. Emergency Registration

Change required: Yes

College of MEDICAL LABORATORY TECHNOLOGISTS 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).

As of August 2023, the CMLTO implemented the Emergency Certificate of Registration Class as per Bill 106 - Pandemic and Emergency Preparedness Act, 2022.

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.