




THE COLLEGE OF MEDICAL LABORATORY TECHNOLOGISTS OF ONTARIO (CMLTO)

RC 19

Letter of Standing Registration Committee

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COMMITTEE CHAIR SIGNATURE	:	 Paula Curti November 22, 2024



1.0 INTRODUCTION

2.0 BACKGROUND

Through the labour mobility provisions (i.e., section 22.18) in the Health Professions Procedural Code, being Schedule 2 of the *Regulated Health Professions Act, 1991* (which essentially codifies the principles of the *Ontario Labour Mobility Act, 2009*), the provincial government is committed to ensuring professionals regulated in one jurisdiction can become registered in any other jurisdiction in Canada. Where the profession is regulated, a Letter of Standing (LOS) is used when labour mobility applicants wish to register in other provinces or territories. A LOS may also be used where Registrants request detailed information be provided to employers or international regulatory bodies. The Registration Committee (RC) endorses the LOS for labour mobility applicants as an important tool for ensuring public safety. This requirement contributes to assessing an applicant's ability to meet registration requirements including "good character" or "professional suitability" as defined in Section 2(1)2 of Ontario Regulation 207/94 under the *Medical Laboratory Technology Act, 1991*.

3.0 THE POLICY

Labour mobility applicants must submit an LOS that indicates that they currently hold a registration certificate from the regulated province or territory. Labour mobility applicants can apply for an equivalent certificate of registration with which they hold from another jurisdiction.

A LOS includes a history of their conduct, quality assurance compliance, and details about their active engagement hours as a medical laboratory technologist. The LOS is sent directly to the CMLTO from the health regulatory College where the applicant is currently registered. The LOS is part of the applicant's supporting documentation for their CMLTO registration application.

Section 36 (1)(c) of the *Regulated Health Professions Act, 1991*, allows the CMLTO to share detailed information when there is a previous or ongoing investigation, allegation, conviction, suspension, or discipline hearing involving the applicant or that the applicant's certificate of registration is subject to terms, conditions, or limitations. As legislation differs in each jurisdiction, if another regulator cannot share information in the same manner, a 'Consent Form to Disclose Personal Information Form' will be sent to the applicant. The signed consent form enables the jurisdiction in which the applicant is currently registered to share information related to the issue with the CMLTO. The signed consent form will be sent to the applicable College to request further information about the issue. If the applicant does not agree to the disclosure of their personal information, the application will be referred to the Registration Committee as suitability to practice cannot be properly assessed



without the supporting information. Once the details are received from the other College(s) regarding the issue, the application will be reviewed by the Registrar & CEO and may be referred to RC if there are concerns about suitability to practise.

By asking for a LOS to be sent to a third party, such as another regulator, the applicant declares consent to the CMLTO to send all relevant information, in the Registrar's opinion, to the other party. The CMLTO endeavours to make this clear to its Registrants by including on its website a list of all the categories of information that might be shared when a Registrant requests a LOS.

In addition to conduct matters or concerns, the CMLTO may inquire about any other items listed on the LOS. For example, if there are inquiries related to an applicant's active engagement, CMLTO staff may seek clarification or further information and additional submissions.

The CMLTO generally provide the following information related to their Registrant as of the date of the letter:

- Information related to the Registrant's registration, including registration number, status, year of first registration, year of expiry, date of resignation
- Registrant's practice specialties
- Registrant's qualifications and credentials
- Registrant's self-reported MLT practice hours for the last five years, if collected
- Any fees currently owed by Registrant to the CMLTO
- Whether the Registrant is in compliance with the regulator's professional liability insurance requirements
- Registrant's registration history with other regulators, if known
- The details of any current or past restrictions, terms, limitations, conditions, or interim orders on Registrant's certificate/license
- The details of, and reasons for, any current or past suspensions or revocations, (including for non-payment of fees)
- Whether the Registrant is in compliance with any continuing competence or quality assurance program
- Details of any current or past acknowledgements and undertakings Registrant has entered into.
- Whether Registrant is currently being investigated by any regulatory body
- The details of any current complaints/reports/inquiries, investigations, or proceedings alleging professional misconduct, incompetence or incapacity against Registrant
- The details of any past disciplinary or fitness to practice findings made against Registrant, including penalties ordered



- The details of any existing charges against Registrant and any restrictions (such as bail conditions), in relation to any offence
- The details of any findings of guilt against Registrant in relation to any offence
- Any other information about Registrant's conduct, competence, or capacity that in the opinion of the Registrar is relevant to their suitability to be registered as a medical laboratory technologist.

4.0 PURPOSE

To describe the Registration Committee's policy on LOS for those requesting information be sent to a third party including for labour mobility.

5.0 SCOPE

This policy applies to the Registration staff.

6.0 COMMITTEE PROCESS AND PROCEDURES

Refer to the following Registration Committee Policy

- RC-17 Suitability to practise

7.0 PRINCIPLES

CMLTO in carrying out its public protection mandate, uses a LOS to help assess an applicant's suitability to practice. In turn, this ensures the safety of the public when receiving care from medical laboratory technologists.

8.0 DEFINITIONS

9.0 EXCEPTIONS

All CMLTO registration requirements are exemptible. However, a labour mobility applicant must articulate clear reasons for why they cannot provide a LOS as part of their application. The Registrar may refer an applicant to the Registration Committee if there is reasonable doubt that they meet all registration requirements, including good character or professional suitability.