



College of Medical  
Laboratory Technologists  
of Ontario

# BOARD MEETING MATERIAL

Friday, November 21, 2025 / 9:00 AM - 4:30 PM



## AGENDA

### CMLTO BOARD OF DIRECTORS MEETING

### Hybrid (In-Person / Virtual) Generative / Strategic Thinking Meeting

Friday, November 21, 2025 / Time: 9:00 a.m. – 4:30 p.m.

Chair: K. Persad, Board Chair – CMLTO Board of Directors

Agenda Item	Topic	Proposed Outcome	Lead	Report Type	Page Number	Start Time
1.0	<b>WELCOME AND CALL TO ORDER</b>					9:00 am
1.1	Welcome and Roll Call	Board Attendance	K. Persad	N/A	N/A	9:00 am
1.2	Land Acknowledgement	Land Acknowledgement	K. Persad	N/A	N/A	9:05 am
2.0	<b>APPROVAL OF MEETING AGENDA</b>					9:07 am
2.1	Review and Approval of Meeting Agenda	Board Approval <i>(Motion)</i>	K. Persad	N/A	N/A	9:07 am
2.2	Declaration of Conflict of Interest	Declaration of Conflict of Interest	K. Persad	Read Item 2.2	N/A	9:08 am
3.0	<b>GOVERNANCE PROCESS: POLICY IMPLEMENTATION</b>					9:10 am
3.1	Election of 2026 Interim Board Vice-Chair, Professional	Board Approval <i>(Motion)</i>	K. Persad	Read Item 3.1		9:10 am
4.0	<b>GOVERNANCE PROCESS: BOARD ORIENTATION / CONTINUING LEARNING / POLICY DEVELOPMENT</b>					9:20 am
4.1	<b>GP IV-70 CMLTO Board Effectiveness Evaluation Policy:</b> 2025 External Evaluation of Board Effectiveness Outcomes & Recommendations	Board is Informed	K. Persad	Read Item 4.1 Presentation at meeting	N/A	9:20 am
<b>BREAK</b>						10:00 am
4.2	Board Discussion and Consideration of Learnings from the 2025 Govern for Impact Annual Learning Conference	Board Discussion	K. Persad T. Rix G. Broukhanski M. Cakar	Read Item 4.2		11:00 am



Agenda Item	Topic	Proposed Outcome	Lead	Report Type	Page Number	Start Time
LUNCH						12:00 pm
5.0	<b>GOVERNANCE PROCESS: BOARD ORIENTATION / CONTINUING LEARNING / POLICY DEVELOPMENT (CONTINUED...)</b>					
5.1	Overview of Artificial Intelligence: Opportunities, Risks, and Emerging Trends	Board is Oriented	Paul Smith Future Directors, Founder	Presentation at meeting		1:00 pm
BREAK						2:30 pm
5.2	Advancing Responsible Artificial Intelligence at CMLTO: Strategy & Governance	Board Approval <b>(Motions)</b>	K. Persad J. Tzountzouris Maggie Cakar	Read Item 5.2 Presentation at meeting		2:45 pm
5.3	Advancing Responsible Artificial Intelligence at CMLTO: Implementation Plan	Board is Informed	J. Tzountzouris Maggie Cakar	Read Item 5.3 Presentation at meeting		4:00 pm
6.0	ADJOURNMENT					
						4:30 pm



## **AGENDA ITEM 1.0**

<b>1.0</b> <b>WELCOME AND CALL TO ORDER</b>	
1.1	Welcome and Roll Call
1.2	Land Acknowledgement



## **AGENDA ITEM 2.0**

<b>2.0      APPROVAL OF MEETING AGENDA</b>	
2.1	Review and Approval of Meeting Agenda
2.2	Declaration of Conflict of Interest



## **AGENDA ITEM 3.0**

<b>3.0</b>	<b>GOVERNANCE PROCESS: POLICY IMPLEMENTATION</b>
3.1	Election of 2026 Interim Board Vice-Chair, Professional



## Briefing Report to Board

**Date** : November 14, 2024

**From** : John Tzountzouris, Registrar & CEO

**Subject** : Nominations for Election of 2025 Interim Vice-Chair, Professional (CMLTO By-Law / Section 4.2.3 Election of Board Officers)

### Report Purpose:

- Board Policy
- Development/Enhancement
- Regular Policy Review
- Policy Approval
- Ends Policy
- Executive Limitations Policy
- Board-CEO Relationship Policy
- Governance Process
- Board Implementation of Policy
- Board-Staff Relationship Policy
- Governance Process
- Monitoring Report
- Ends
- Executive Limitations
- Statutory Committee
- Ownership Linkage Report
- Incidental Report**
- Registrar & CEO**
- Board Chair
- Other: Ends Briefing Report

### PUBLIC INTEREST RATIONALE:

This matter pertains to the public interest as it relates to maintaining effective governance and leadership continuity within the CMLTO Board of Directors. The election of an Interim Vice-Chair, Professional, ensures that the CMLTO Board of Directors continues to operate with appropriate leadership capacity to fulfill its statutory and strategic responsibilities in regulating the medical laboratory technology profession in the interest of the public.

### Proposed Motion:

#### Be it resolved that,

The Board moves to accept the election of George Broukhanski as the Interim Vice Chair, Professional for the remainder of 2025 by acclamation.

### BACKGROUND

On October 6, 2025, Helen Meaney, Vice-Chair, Professional, submitted their resignation from their position on the CMLTO Board of Directors effective November 4, 2025.

The following By-Law sections address matters related to vacancies in the CMLTO Board Officer positions and the election of Vice-Chairs.



**CMLTO By-Law / 4.8.1.2 – Vice-Chair(s)**

“Where the office of the Vice-Chair(s) becomes vacant before the expiry date of their term of office, the Board shall elect a new Vice-Chair from among its Board Members for the remainder of the term.”

In the case of the absence or inability to act of any officer of the College, or for any other reason that the Board may deem sufficient, the Board may delegate all or any powers of such officer to any other officer or any member of the Board for the time being.”

**CMLTO By-Law / 4.2.3 – Election of Board Officers**

“Any Board Member is eligible to stand for election to the office of Chair or Vice-Chair. The Vice-Chair, Professional shall be elected from among the Professional and Academic Members of the Board. The Vice-Chair, Public shall be elected from among the Public Members of the Board.

The Board Chair and Vice-Chairs shall be elected at the last regular Board meeting of the year in accordance with the Process for Election of Board Officers as set out in Schedule 1 of this By-Law.”

While the regular election of CMLTO Board Officers takes place at the final Board meeting of the year, there are no By-Law provisions outlining the process for conducting an election to fill a Vice-Chair vacancy during the year (an irregular election), other than the provision under Section 4.8.1.2 – Vice-Chair(s), which states that “the Board shall elect a new Vice-Chair from among its Board Members for the remainder of the term.”

As there is no process outlined in the CMLTO By-Law for filling a Vice-Chair vacancy mid-year, the election for the Interim Vice-Chair, Professional will be conducted at the Board meeting on November 21, 2025, to fill the vacancy for the remainder of the current term.

During the interim period between November 4 and November 21, 2025, the Vice-Chair, Professional position remains vacant. There are no scheduled Board meetings and no decisions requiring the participation of both Vice-Chairs during this period.

Helen Meaney was serving as a member of the Executive Committee and the Fitness to Practise Committee. The Interim Vice-Chair, Professional will automatically become a member of the Executive Committee. The Committee will meet on December 17, 2025, to prepare the proposed 2026 CMLTO Statutory Committee Compositions. Fitness to Practise Committee doesn't have any



meetings for the rest of the year. Accordingly, this temporary vacancy will not impact the operations of the Fitness to Practise Committee.

### **CALL FOR NOMINATIONS FOR THE INTERIM VICE-CHAIR, PROFESSIONAL POSITION**

A memo was sent to Board Members on October 10, 2025, requesting that nominations for the Interim Vice-Chair, Professional be submitted to the Registrar & CEO by the deadline date of Friday, October 31, 2025.

The processes pertaining to the nomination of the Chair and Vice-Chairs have been completed in compliance with the CMLTO By-Law / Section 4.2.3 Election of Board Officers.

### **NOMINATION FORMS RECEIVED BY THE DEADLINE DATE OCTOBER 31, 2025**

**Nominee** : George Broukhanski

**Nominated by** : Imaya Vithana (October 25, 2025)

**Seconded by** : Rohini Soni (October 31, 2025) & Tammie Rix (October 31, 2025)

### **GEORGE BROUKHANSKI NOMINATION SUMMARY – FOR THE POSITION: INTERIM VICE-CHAIR, PROFESSIONAL**

"I am applying for the interim Vice-Chair, Professional position on the CMLTO Board. My decision to apply for this position stems from a deep commitment to advancing the profession of medical laboratory technology and supporting the College's mission to protect the public through regulation and leadership.

As a current Board Member, I have gained valuable insight into the governance processes and strategic priorities of the College. I will bring to this role a collaborative mindset, strong analytical skills, and a commitment to making ethical and transparent decisions. My professional background equips me with a comprehensive understanding of the challenges and opportunities medical laboratory technologists are facing, and I am passionate about fostering innovation, accountability, and inclusivity within our regulatory framework.

In the Vice-Chair role, I aim to support the Chair and fellow Board Members in maintaining effective governance, facilitating constructive dialogue, and ensuring that the voices of regulated professionals are heard and respected. I am confident that my experience, integrity, and commitment to excellence will make a positive contribution to the leadership and direction of the Board."

#### **Nomination Result:**

There being no other nominations, George Broukhanski will be declared elected **Interim Vice-Chair, Professional** by acclamation at the November Board meeting.



**APPENDICES:**

**Appendix 1 – Interim Vice-Chair, Professional Nomination Form (George Broukhanski)**



APPENDIX 1

Interim Vice-Chair, Professional Nomination Form (George Broukhanski)

**ELECTION OF 2025 CMLTO BOARD OFFICERS  
NOMINATION FORM**

**CMLTO BY-LAW**

**Section: 4.8.1.2 – VICE-CHAIR(S)**

*"Where the office of the Vice-Chair(s) becomes vacant before the expiry date of their term of office, the Board shall elect a new Vice-Chair from among its Board Members for the remainder of the term."*

**DEADLINE FOR SUBMISSION OF NOMINATION FORM IS  
Friday, October 31, 2025, by 4:30 p.m.**

**NOMINATION FOR** : Interim Vice-Chair, Professional

**BOARD MEMBER NOMINATED** : George Broukhanski

**BOARD MEMBERS**

**SUPPORTING THE NOMINATION:** Imaya Vithana

Name	Imaya Vithana	Name	
Signature		Signature	
Date	2025-10-25	Date	

**NOMINEE NAME:** George Broukhanski

I accept this nomination: \_\_\_\_\_

(Signature of nominee)

Date: \_\_\_\_\_

*Nominees for election may include a summary of their reasons for accepting the nomination and the strengths they would bring to the position. This information will be circulated to Board members prior to the election.*



## ELECTION OF 2025 CMLTO BOARD OFFICERS NOMINATION FORM

### CMLTO BY-LAW

Section: 4.8.1.2 – VICE-CHAIR(S)

*"Where the office of the Vice-Chair(s) becomes vacant before the expiry date of their term of office, the Board shall elect a new Vice-Chair from among its Board Members for the remainder of the term."*

**DEADLINE FOR SUBMISSION OF NOMINATION FORM IS**

Friday, October 31, 2025, by 4:30 p.m.

**NOMINATION FOR** : Interim Vice-Chair, Professional

**BOARD MEMBER NOMINATED** : George Broukhanski

**BOARD MEMBERS**

**SUPPORTING THE NOMINATION:**

Name	ROTTINI SONI	Name	
Signature		Signature	
Date	Oct 31/2025	Date	

**NOMINEE NAME:** George Broukhanski

I accept this nomination: \_\_\_\_\_

(Signature of nominee)

Date: \_\_\_\_\_

*Nominees for election may include a summary of their reasons for accepting the nomination and the strengths they would bring to the position. This information will be circulated to Board members prior to the election.*



## ELECTION OF 2025 CMLTO BOARD OFFICERS NOMINATION FORM

### CMLTO BY-LAW

Section: 4.8.1.2 – VICE-CHAIR(S)

*"Where the office of the Vice-Chair(s) becomes vacant before the expiry date of their term of office, the Board shall elect a new Vice-Chair from among its Board Members for the remainder of the term."*

**DEADLINE FOR SUBMISSION OF NOMINATION FORM IS  
Friday, October 31, 2025, by 4:30 p.m.**

**NOMINATION FOR** : Interim Vice-Chair, Professional

**BOARD MEMBER NOMINATED** : George Broukhanski

**BOARD MEMBERS**

**SUPPORTING THE NOMINATION:**

Name	Tammie Rix	Name	
Signature		Signature	
Date	October 31 2025	Date	

**NOMINEE NAME:** George Broukhanski

I accept this nomination: \_\_\_\_\_

(Signature of nominee)

Date: \_\_\_\_\_

*Nominees for election may include a summary of their reasons for accepting the nomination and the strengths they would bring to the position. This information will be circulated to Board members prior to the election.*



## ELECTION OF 2025 CMLTO BOARD OFFICERS NOMINATION FORM

### CMLTO BY-LAW

Section: 4.8.1.2 – VICE-CHAIR(S)

*"Where the office of the Vice-Chair(s) becomes vacant before the expiry date of their term of office, the Board shall elect a new Vice-Chair from among its Board Members for the remainder of the term."*

**DEADLINE FOR SUBMISSION OF NOMINATION FORM IS**  
**Friday, October 31, 2025, by 4:30 p.m.**

**NOMINATION FOR** : Interim Vice-Chair, Professional

**BOARD MEMBER NOMINATED** : George Broukhanski

**BOARD MEMBERS  
SUPPORTING THE NOMINATION:** self nomination

Name		Name	
Signature		Signature	
Date		Date	

**NOMINEE NAME:** George Broukhanski

I accept this nomination: George Broukhanki

(Signature of nominee)

Date: 30-Oct-2025

*Nominees for election may include a summary of their reasons for accepting the nomination and the strengths they would bring to the position. This information will be circulated to Board members prior to the election.*



## **AGENDA ITEM 4.0**

4.0	<b>GOVERNANCE PROCESS: BOARD ORIENTATION / CONTINUING LEARNING / POLICY DEVELOPMENT</b>
4.1	<b><u>GP IV-70 CMLTO Board Effectiveness Evaluation Policy:</u></b> 2025 External Evaluation of Board Effectiveness Outcomes & Recommendations
4.2	Board Discussion and Consideration of Learnings from the 2025 Govern for Impact Annual Learning Conference



## Briefing Report to Board of Directors

**Date** : November 21, 2025

**From** : Karen Persad, Board Chair

**Subject** : 2025 External Evaluation of Board Effectiveness Outcomes & Recommendations

- |   |   |
|---|---|
| <input type="checkbox"/> Board Policy Development/Enhancement             | <input type="checkbox"/> Monitoring Report            |
| <input type="checkbox"/> Regular Policy Review                            | <input type="checkbox"/> Ends                         |
| <input type="checkbox"/> Policy Approval                                  | <input type="checkbox"/> Executive Limitations        |
| <input type="checkbox"/> Ends Policy                                      | <input type="checkbox"/> Statutory Committee          |
| <input type="checkbox"/> Executive Limitations Policy                     | <input type="checkbox"/> Ownership Linkage Report     |
| <input type="checkbox"/> Board-Staff Relationship Policy                  | <input type="checkbox"/> Incidental Report            |
| <input type="checkbox"/> Governance Process                               | <input type="checkbox"/> Registrar & CEO              |
| <input checked="" type="checkbox"/> <b>Board Implementation of Policy</b> | <input type="checkbox"/> Board Chair                  |
| <input type="checkbox"/> Board-CEO Relationship Policy                    | <input type="checkbox"/> Other: Governance Specialist |
| <input checked="" type="checkbox"/> <b>Governance Process</b>             |   |

### **PUBLIC INTEREST:**

The CMLTO Board's evaluation of its own effectiveness serves the public interest by ensuring that effective governance has and continues to be an evolving CMLTO commitment, guided by research, contemporary thinking, and evidence-informed practices. Effective governance is recognized as a foundational component of the CMLTO's ability to deliver on its public protection mandate.

### **BACKGROUND**

In late 2024, the CMLTO Board of Directors committed to undertaking an independent assessment of its effectiveness by signing a contract with Governance Solutions Inc after an extensive request for proposal process. This was undertaken as part of best practice in governance excellence as required by the Ontario Ministry of Health's College Performance Management Framework, which requires an independent assessment of Board effectiveness to be completed at least once every three years. The relevant Board Governance Process Policy, GP IV-70: CLMTO Board Effectiveness Evaluation Policy was also updated in September 2024 to mirror this requirement.

The GSI assessment kicked off in January 2025. The assessment process was primarily managed by the Board Chair, and the Executive Committee on behalf of



the Board. Additionally, the following actions were undertaken as part of the assessment:

- GSI staff attended the February 2025 Board meetings as observers;
- Through February and March 2025:
  - Questionnaires and in-person interviews were completed by CMLTO Board Members, CMLTO Staff and Karen Fryday-Field, CMLTO Governance Consultant;
  - Governance related documents were provided to GSI, as requested.

The results of the GSI Assessment were presented to the Executive Committee on May 8, 2025. The final Assessment report has been uploaded to the Board Portal, and a summary presentation is attached as Appendix 1. Subsequently, the Executive Committee met to discuss the GSI assessment outcomes and report on May 28<sup>th</sup> and June 17<sup>th</sup>.

Karen Fryday-Field, CMLTO Governance Consultant, was also in attendance for all meetings related to the GSI Assessment, and has provided a report in response to the recommendations in the final GSI Assessment report, which has been uploaded to the Board Portal.

## **BOARD EVALUATION OUTCOMES**

A brief very high-level summary of the GSI Assessment, taken both from the formal report, as well as communications from David Brown, GSI, is as follows:

“CMLTO scored 4.55/5 across governance domains, outperforming peers. GSI’s assessment is that CMLTO has strong governance and board practices. We have identified some opportunities for you to enhance board effectiveness building on those strengths. These enhancements would give the Board a more streamlined experience, and restructure some of its work while continuing to adopt best practices in regulatory governance.”

Throughout the Executive Committee discussions post-assessment, all of the GSI recommendations were discussed. While there are many recommendations that the Executive Committee feel worthwhile to further explore and possibly implement, it was also noted that there were some recommendations that the Executive Committee felt were not an accurate representation of the Board’s performance or effectiveness.



## BOARD DISCUSSION

At the November 21 Board meeting, the Board will have an opportunity to discuss the findings of the GSI Assessment, the Governance Consultant's report as well as the summary of discussions held by the Executive Committee.

**All of this information has been compiled into a series of recommendations in Appendix 2. This is the document that will be used as the foundation for the presentation to the Board at the November 21 meeting.**

The Board is being asked to consider the following questions to guide the discussion:

- What have we learned about our individual and collective effectiveness from this assessment?
- Which recommendations from the assessment should we prioritize for implementation?
- How will we communicate the key outcomes, internally and, where appropriate, externally?

## PROPOSED NEXT STEPS

Pending the outcomes of the November 21, 2025 Board meeting, it is suggested that the opportunities for improvement of the Board's effectiveness be integrated into the next iteration of the CMLTO Governance Modernization Plan. The revised plan will be brought forward to the full Board for discussion in 2026, as scheduled on the 2026 Integrated Board Strategic Agenda.

## APPENDICES

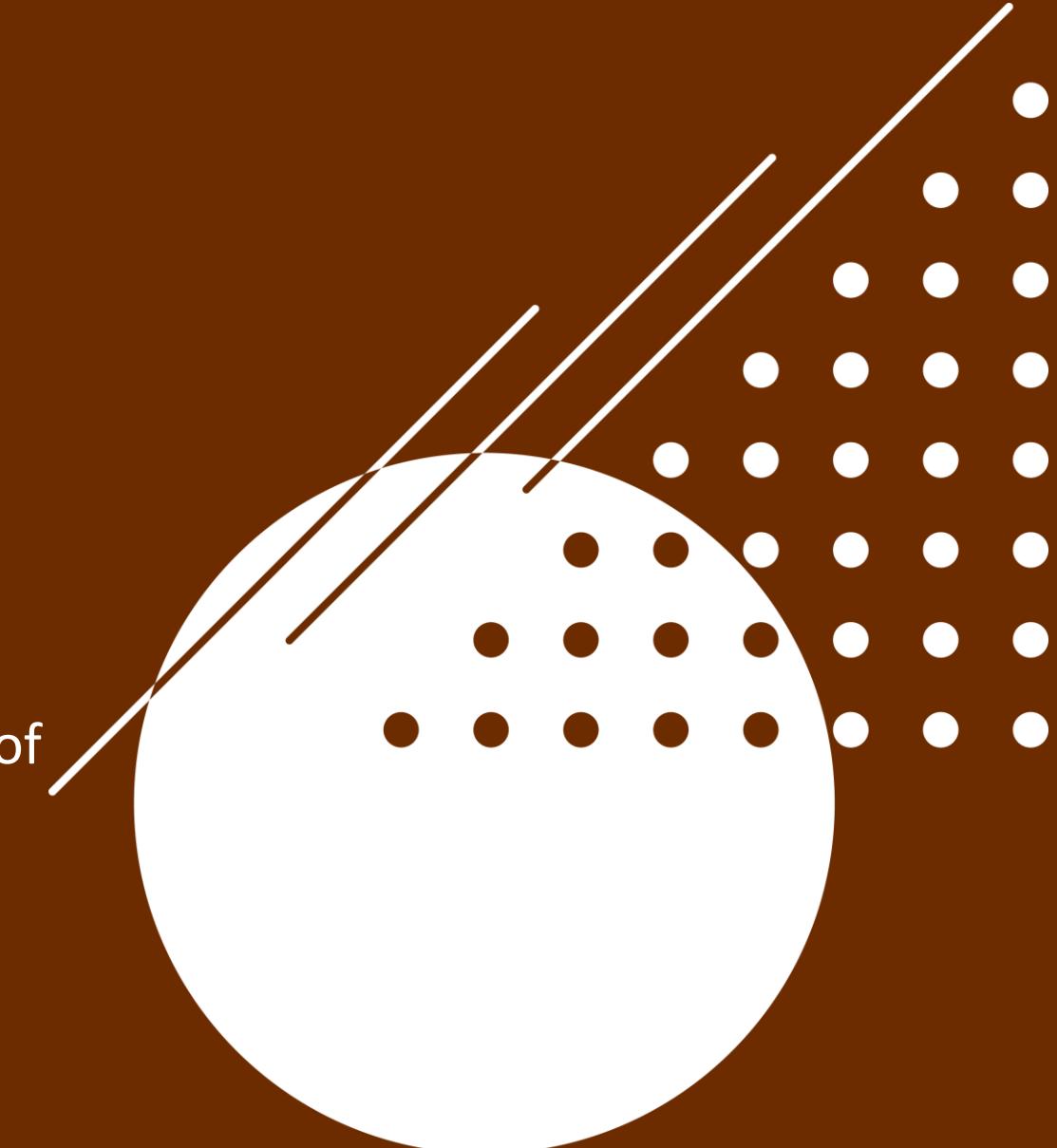
**Appendix 1 – Governance Solutions Presentation to the Executive Committee RE: Independent Evaluation of the Board**

**Appendix 2 – GSI Assessment Summary & Recommendations**

# Independent Evaluation of the Board

College of Medical Laboratory Technologists of  
Ontario (CMLTO)

May 8, 2025





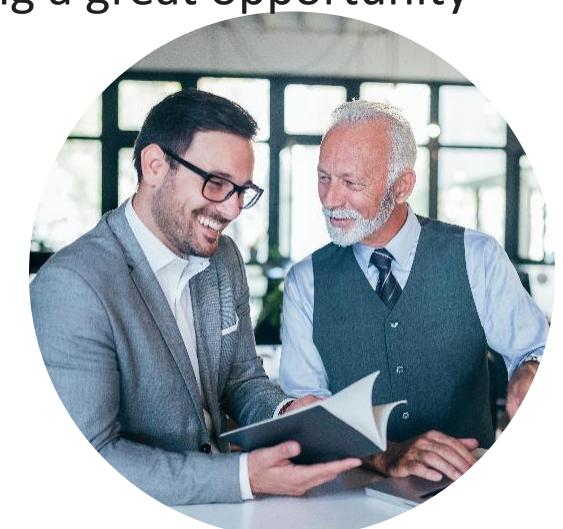
# Evaluation Methodology

- CMLTO engaged Governance Solutions Inc. (GSI) as its independent governance professional to come alongside CMLTO for a time, to provide researched best practices, deep experience and governance expertise to develop and conduct an external evaluation of the Board's effectiveness in 2025.
- Multi-method diagnostic process: interviews, meeting observations, an online survey, and detailed third-party policy and document reviews to best practices. These culminated in an evidence-based roadmap to modernize, simplify, and enhance board governance aligned with best practices and regulatory obligations.

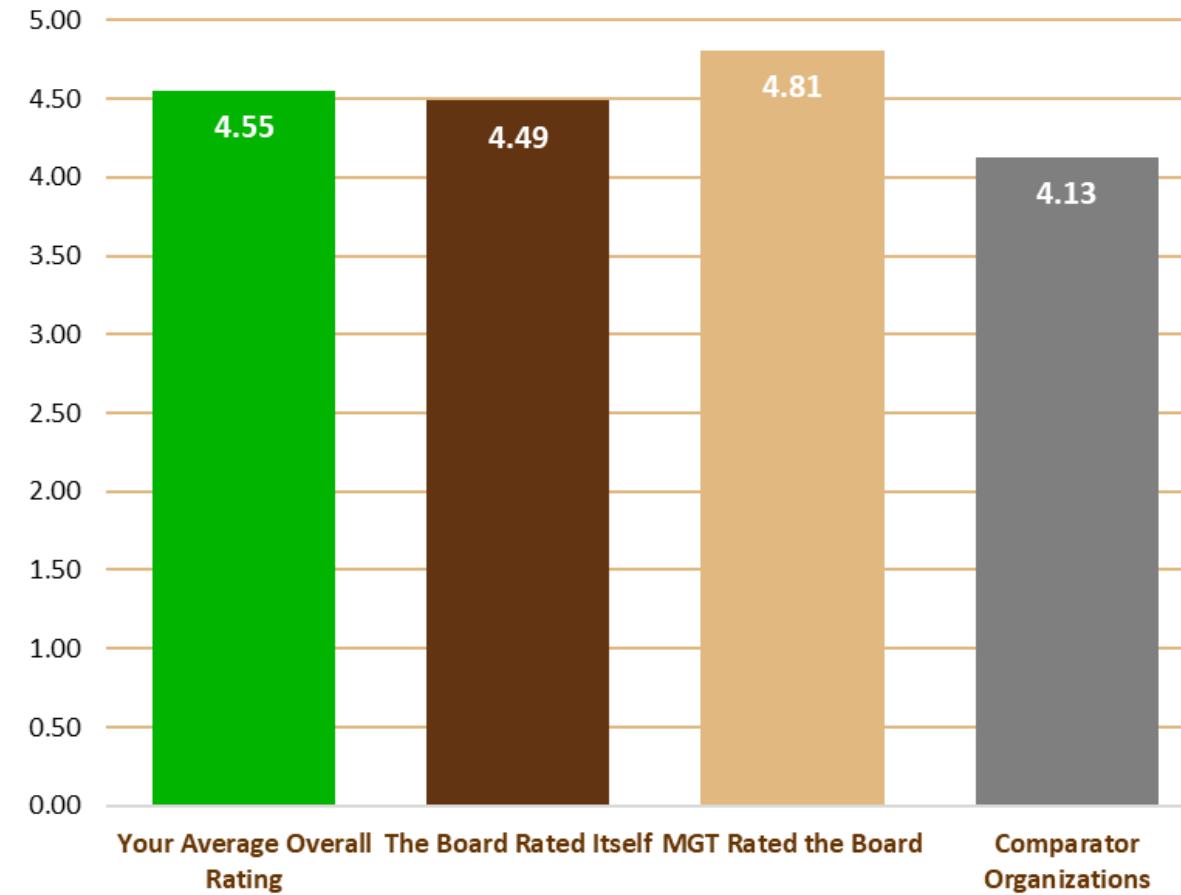


# Key Findings

- In the self-assessment, CMLTO scored 4.55/5 across governance domains, outperforming peers.
- Key strengths: strategic planning, CEO oversight, stakeholder engagement: CMLTO's self-assessment reflects a strong sense of confidence and commitment.
- The difference between the self-assessment and GSI's assessment may stem from varying levels of exposure among Board members to the full range of corporate governance models, their respective advantages, and the structural constraints of CMLTO's current model—presenting a great opportunity for shared learning and development.
- Areas for growth: board diversity, EDIJ performance tracking, and careholder engagement.
- Comments suggest expanding generational diversity, financial literacy, and strategic agility.



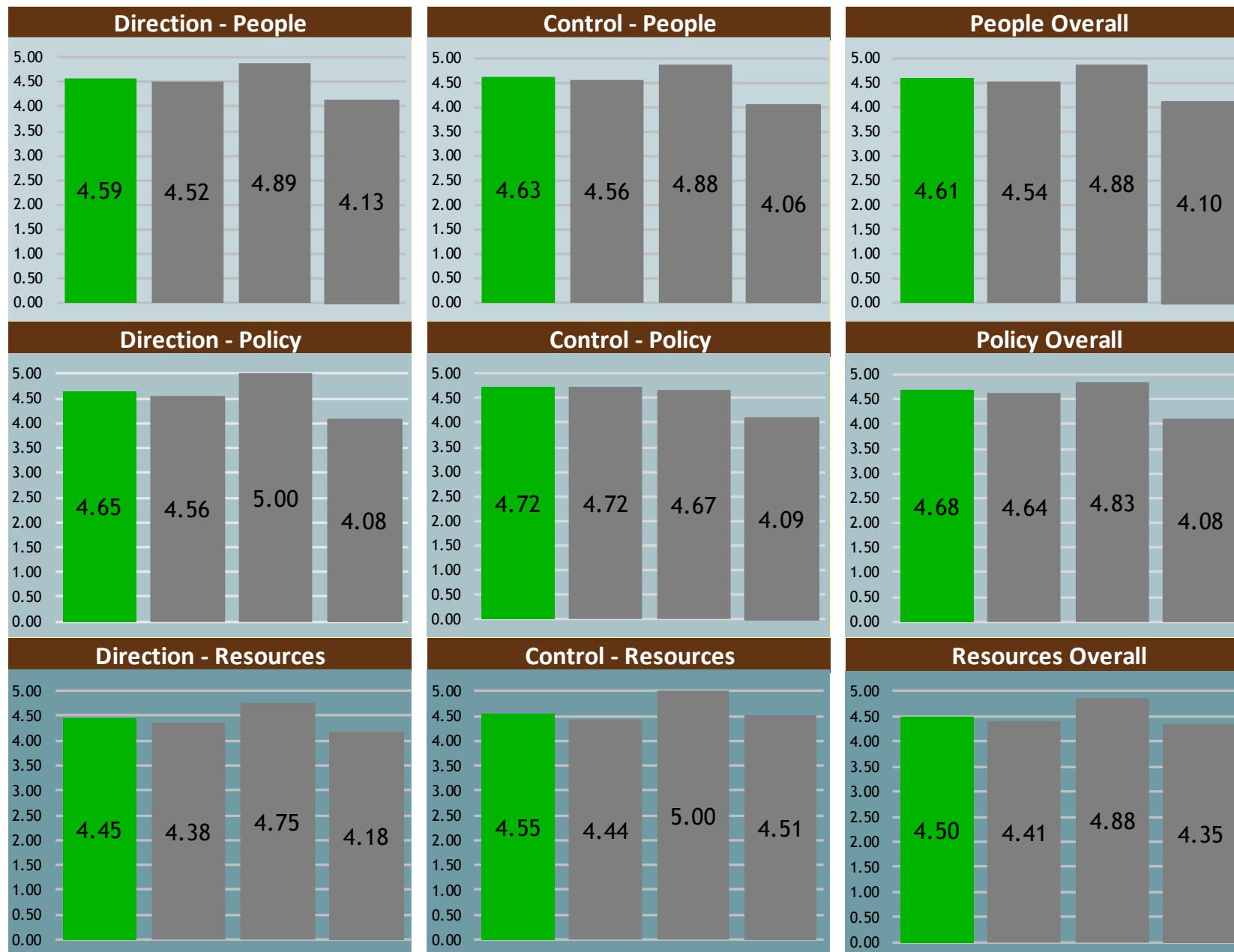
# CMLTO Board Overall Average Rating



## Board Evaluation Scorecard

**Legend:** 1-Your Average Rating; 2-Board Rating; 3-Management Rating; 4-Comparator Organization





# Governance Strengths

**Strong  
Culture and  
Leadership**

**Mature  
Governance  
Model**

**High-  
Performing  
Board Self-  
Assessment**

**Robust Policy  
Infrastructure**

# Governance Strengths



**Strong  
Culture and  
Leadership**

CMLTO's Board demonstrates a clear commitment to public protection, ethical practice, and constructive dissent. Leadership by the Chair and CEO is highly regarded.



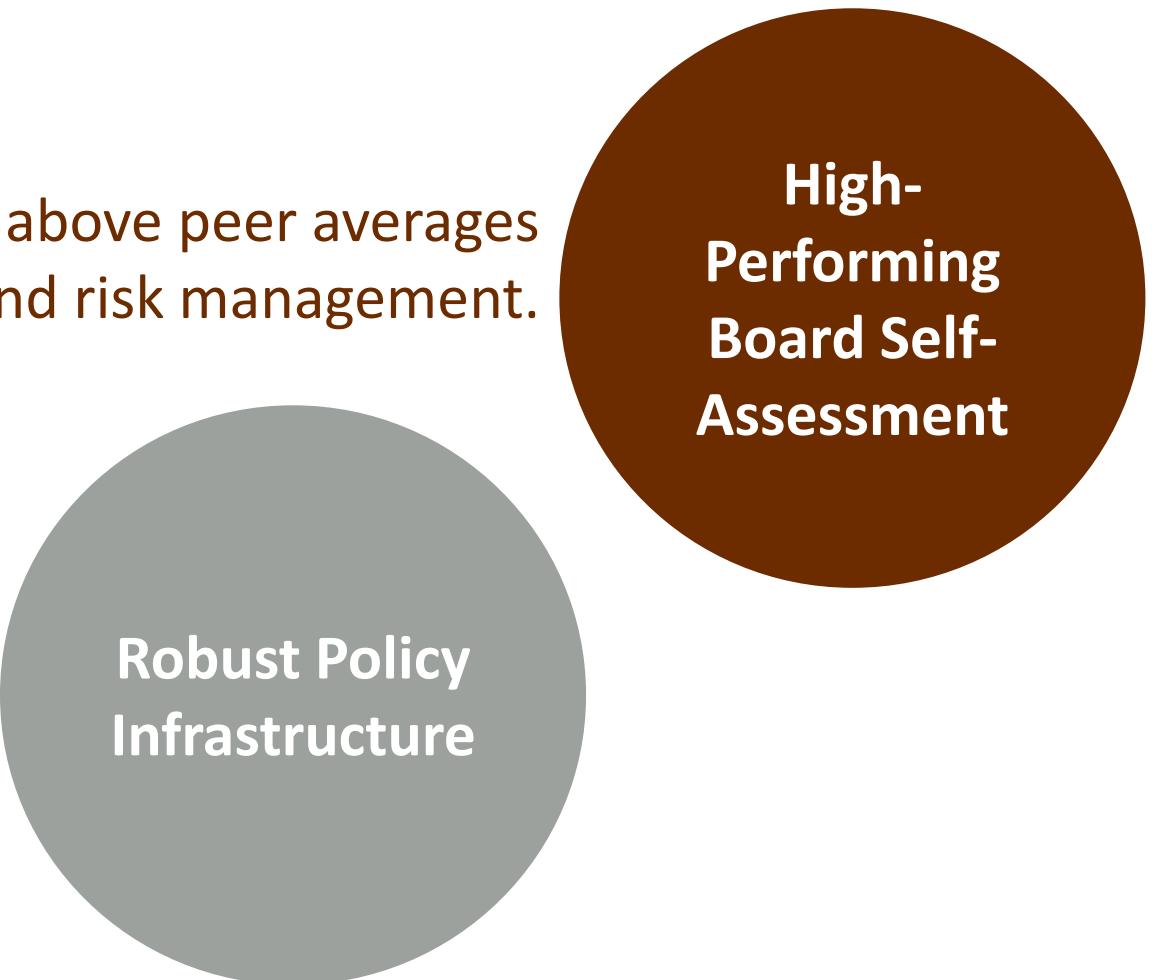
**Mature  
Governance  
Model**

The use of the Policy Governance model is well embedded, contributing to role clarity, strategic focus, and consistent evaluation practices.

# Governance Strengths

Survey scores placed CMLTO significantly above peer averages in strategic direction, CEO oversight, and risk management.

Comprehensive policies, committee terms of reference, and role descriptions are in place, including Ends policies that anchor strategic planning and performance tracking.



**Robust Policy Infrastructure**

**High-  
Performing  
Board Self-  
Assessment**

# Challenges and Areas for Improvement

- 1. Governance Rigidity:** The current Policy Governance model can be inflexible, overemphasizing procedural compliance over strategic adaptability.
- 2. Oversized Board:** A legislated 18-member board linked to electoral districts hinders efficiency and competency-based composition.
- 3. Lack of Functional Committees:** Only the Executive Committee exists; others such as Audit and Governance Committees are absent.
- 4. Blurring of Roles:** Policy champions and consultants sometimes engage in operational areas, undermining governance integrity.
- 5. Overloaded Agendas:** Board meetings are inefficiently paced, often burdened by excessive documentation and operational minutiae.
- 6. Stakeholder Engagement and EDIJ:** Opportunities exist to enhance public accountability and Equity, Diversity, Inclusion, and Justice oversight.



## General Notes

- The GSI report identified six potential areas for improvement.
- Some of the recommendations were not discussed in detail by the Executive Committee as the CMLTO and the Board have already address them, or they are in the process of being addressed. Further, some of the recommendations were not an accurate representation of the Board's performance or effectiveness. This may have been partially due to limited exposure of GSI to Board processes.
- The Board should consider focusing in on those that have the most meaning and impact on the CMLTO Board.
- It was noted that overall the report indicated that CMLTO was ahead of its peers, and further that by simply completing this evaluation, the CMLTO has met the CPMF requirements.

### **GSI Recommendation 1: Governance Rigidity**

Overall, the Board uses Policy Governance wisely and in a manner that is still true to its principles and evolved from the original conceptualization or how it is applied in other organizations

Discussion centered around efficiency not the effectiveness of Policy Governance. Recommendations were in fact in line with the principles behind Policy Governance and may have been misinformed by what they saw through interviews, policy reviews and observing one Board meeting.

The reviewers spoke about rigidity in application of Policy Governance, however the Executive Committee further defined and interpreted this not as rigidity, rather as discipline, which should be observed in the application of any governance model.

The observation that the policy governance model demonstrates inflexibility or overemphasizes procedural compliance at the expense of strategic adaptability is not substantiated by either objective or subjective evidence within the reviewer's report.

It appears that the external review team may not be referencing the most current interpretations and applications of the policy governance model. Their characterization seems to align with a version of policy governance that is either poorly implemented or narrowly procedural—an approach that does not reflect either the intent or the practice of policy governance at CMLTO. Properly applied,



policy governance is a highly adaptive governance system that explicitly supports strategic responsiveness and organizational agility.

Finally, it is important to note that the reviewers may have misinterpreted disciplined adherence to governing principles as rigidity in practice. In reality, CMLTO's discipline in applying governance principles provides the structure necessary to enable, rather than constrain, flexibility and strategic evolution.

It would be beneficial to explore opportunities for greater efficiency, i.e. how the Board spends its time on certain items, such as compliance reviews, amongst other things. However, it is important to ensure that the Board's processes are efficient without compromising effectiveness.

The Board should and will continue to review the wholeness of specific risk policies, e.g cybersecurity.

**Executive Committee Recommendation:**

Include an item on the 2026 Governance Modernization plan to evaluate proposed changes to Board agenda items to increase overall Board efficiency. This may overlap with the implementation of other recommendations (i.e. creation of a Governance Committee) if the Board moves forward with those recommendations.

**GSI Recommendation 2: Oversized Board**

The report noted the challenge of having a legislated board size of 18 members, which may hinder efficiency. However, we would need to amend the MLT Act to change the size of the Board. While this would be nice, it is unlikely to happen and there is a balance to be struck between the need to mitigate risk of large Board vs being unconstituted.

Concerns were raised about geographic representation versus the risk of a Toronto-centric Board if electoral districts are eliminated. At the present time, the CMLTO has taken the position that electoral districts support the premise of being inclusive of all geographic differences across the province.

It was noted by the Executive Committee that CMLTO has also committed to actively moving toward a competency-based composition and has formally adopted a Board Competency and Characteristics Framework for Board development and selection.

**Executive Committee Recommendation:**

Continue moving forward with implementation of the Board Competency and Characteristics Framework as an item on the 2026 Governance Modernization plan.



### **GSI Recommendation 3: Lack of Functional Committees**

The Executive Committee thought that this was a good topic to think about to look at greater efficiency of certain areas of Board responsibility. However, the Board would need to be very clear on why these Committees would be created.

Within the Policy Governance model adopted by CMLTO, the use of committees or task forces is carefully guided by principle. The model holds that a board should establish such bodies only when they are demonstrably necessary to assist the board in fulfilling its work. It also cautions against the proliferation of committees, as each new committee risks fragmenting collective knowledge, diminishing shared accountability, and weakening the integrated oversight of the full board. When used judiciously, however, committees can enhance board effectiveness by providing focused analysis and informed recommendations on specific matters, i.e., assisting the board with its work, not doing the work of the board.

Questions to be asked would include “what are hoping to accomplish that we are not accomplishing now”, “what would be the terms of reference, scope and intended outcomes of creating these Committees”. The Board would also need to ensure that the Committees don’t delve into the operational aspects already delegated to the R/CEO.

#### **Executive Committee Recommendation:**

Consider exploring additional Board Committees, such as audit, governance, or HR Committees, and their potential roles in improving board efficiency.

Look at the role of Board members on Statutory Committees, as they have different mandates and require different skill sets from members.

### **GSI Recommendation 4: Blurring of Roles**

The concerns raised in the report about the perceived overlap between Board and operational functions, particularly regarding policy champions and the Governance Consultant's role were not discussed in detail as the Executive Committee felt that these recommendations arose from misunderstandings about the distinction between Board policies and administrative policies.

#### **Executive Committee Recommendation:**

No further recommendations are suggested by the Executive Committee.

### **GSI Recommendation 5: Overloaded Agendas**

The Executive Committee felt that there was definitely an opportunity for improvement here, however, the Board would need to define what we are trying to



accomplish within a framework that ensures consistency with Policy Governance principles, and adds value to efficiency of the Board, but not at the expense of effectiveness.

The Board and CMLTO staff could explore options such as better use of consent agendas, separating educational sessions from Board meetings, and summarizing lengthy reports.

**Executive Committee Recommendation:**

Explore opportunities to streamline the Board meeting packages, including processes for review of policy compliance with all but the Ends Policies.

**GSI Recommendation 6: Stakeholder Engagement and EDIJ**

While this is already embedded in ongoing work, ensuring continued focus and improvement in public accountability, equity, diversity, inclusion, and justice.

The CMLTO has committed to the Global Diversity Equity and Inclusion Benchmark and a preliminary gap analysis is currently underway.

**Executive Committee Recommendation:**

Continue to advance the CMLTO's work on the Global Diversity Equity and Inclusion Benchmark.

**Additional GSI Recommendations for Board Consideration**

The following additional recommendations were presented through the GSI Evaluation, all of which the Executive Committee is suggesting be evaluated through Board discussion:

- Eliminating Vice-Chairs or reducing to one Vice-Chair.
- Extending the Board Chair's term to two years instead of one.
- Enhancing the CEO performance appraisal process with a distinct focus on professional development.



## Briefing Report to Board of Directors

**Date** : November 21, 2025  
**From** : Karen Persad, Tammie Rix, George Broukhanski, & Maggie Cakar  
**Subject** : Learnings from the 2025 Govern for Impact Annual Learning Conference

- |   |   |
|---|---|
| <input type="checkbox"/> Board Policy Development/Enhancement             | <input type="checkbox"/> Monitoring Report            |
| <input type="checkbox"/> Regular Policy Review                            | <input type="checkbox"/> Ends                         |
| <input type="checkbox"/> Policy Approval                                  | <input type="checkbox"/> Executive Limitations        |
| <input type="checkbox"/> Ends Policy                                      | <input type="checkbox"/> Statutory Committee          |
| <input type="checkbox"/> Executive Limitations Policy                     | <input type="checkbox"/> Ownership Linkage Report     |
| <input type="checkbox"/> Board-Staff Relationship Policy                  | <input type="checkbox"/> Incidental Report            |
| <input type="checkbox"/> Governance Process                               | <input type="checkbox"/> Registrar & CEO              |
| <input checked="" type="checkbox"/> <b>Board Implementation of Policy</b> | <input type="checkbox"/> Board Chair                  |
| <input type="checkbox"/> Board-CEO Relationship Policy                    | <input type="checkbox"/> Other: Governance Specialist |
| <input checked="" type="checkbox"/> <b>Governance Process</b>             |   |

### **PUBLIC INTEREST:**

The CMLTO Board's evaluation of its own effectiveness serves the public interest by ensuring that effective governance has and continues to be an evolving CMLTO commitment, guided by research, contemporary thinking, and evidence-informed practices. Effective governance is recognized as a foundational component of the CMLTO's ability to deliver on its public protection mandate.

### **BACKGROUND**

Finally, in addition to the recommendations provided by GSI through the independent assessment process, CMLTO continues to keep a list of governance best practices based on the current CMLTO Governance Modernization Plan, as well as contemporary governance practices, as learned through formal education sessions provided by external organizations (e.g. Govern for Impact, Governance Solutions Inc). More specifically, three Board Members (K. Persad, T. Rix, & G. Broukhanski) and two CMLTO staff member (M. Cakar & J. Tzountzouris) attended the 2025 Govern for Impact Annual Conference in June 2025. After the conference, the group met a few times to discuss their learnings from the conference, and more specifically opportunities to advance governance excellence at CMLTO based on those learnings. A summary of their discussions is attached as Appendix 1.



## **BOARD DISCUSSION**

At the November 21 Board meeting, the Board will have an opportunity to discuss and explore a series of recommendations for governance modernization for the Board to consider. These recommendations were complied by the individuals who attended the 2025 Govern for Impact Annual Learning & Connecting Conference. While this information is outside of the Board's independent evaluation process, it is recommended that this information be considered by the Board for inclusion in the next iteration of the CMLTO Governance Modernization Plan.

## **PROPOSED NEXT STEPS**

Pending the outcomes of the November 21, 2025 Board meeting, it is suggested that the opportunities for improvement of the Board's effectiveness be integrated into the next iteration of the CMLTO Governance Modernization Plan. The revised plan will be brought forward to the full Board for discussion in 2026, as scheduled on the 2026 Integrated Board Strategic Agenda.

## **APPENDICES**

**Appendix 1 – Learnings from the 2025 Govern for Impact Annual Learning Conference**



## **2025 GOVERN FOR IMPACT ANNUAL LEARNING & CONNECTING CONFERENCE**

### **DEBRIEF: INSIGHTS AND NEXT STEPS DISCUSSION**

<b>Attendees:</b>	
Karen Persad, Chair	John Tzountzouris, Registrar and CEO
Tammie Rix, Vice-Chair, Public	Maggie Cakar, Governance Specialist
George Broukhanski, Board Member	

The CMLTO attendees of the 2025 Govern for Impact Annual Learning & Connecting Conference convened to reflect on the event on July 31, 2025, and August 12, 2025. Their discussion focused on the insights gained, emerging ideas, and potential applications for strengthening the CMLTO's governance practices. This report summarizes the key takeaways and identifies initial considerations for next steps.

### **JULY 31, 2025**

#### **1. Board Chair Competencies and Training**

- **Proposal:** Develop guidelines, competencies, and training modules for CMLTO Board Chairs.
- **Purpose:** Prepare current and future chairs, highlight best practices, and possibly extend training to other organizations.
- **Next Step:** Use the existing job description as a foundation; explore creating a practical training program.

#### **2. Orientation for Public Appointees**

- **Issue:** Professional Board Members have an orientation and pre-nomination interview, but Public Appointees do not. This sometimes leads to unmet expectations.
- **Proposed Solution:**
  - Meet with the Public Appointments Secretariat (PAS) to request inclusion of an orientation step.
  - Explore alternatives such as adding a link to orientation videos/documents in the appointment description.



- Create a public webpage on CMLTO website with information and orientation recordings for Public Members.
- **Update:** A meeting with the Public Appointments Secretariat (PAS) is already scheduled.

### **3. Board's Role in Board Member Recruitment**

- **Governance Question:** Should the CMLTO Board of Directors be more directly involved in Board Member recruitment?
- **Ideas Raised:**
  - Have a Board HR Committee handle recruitment and related functions.
  - Possibly revise the CMLTO By-Law if Board Members are to participate in orientation interviews (currently Registrar & CEO only).
  - Consider broader Board HR functions: Registrar & CEO performance appraisals, governance consultant contracts, etc.

### **4. Recognising and Acknowledging Success**

- **Conference Insight:** Boards should be intentional about acknowledging accomplishments and building team cohesion.
- **Suggestions Discussed:**
  - Small gestures (e.g., treats, personal acknowledgments, shared experiences).
  - Recognising collective Board achievements (e.g., approving key policies, completing annual reports).
  - Building inclusivity for hybrid participants (e.g., shared treat boxes, e-cards, virtual activities).
  - Avoid individual recognition that could conflict with "one voice" governance or introduce bias.
- **Registrar & CEO Recognition:** Mixed views—concern about crossing into subjective territory; consensus leaned toward recognising Board achievements as a whole.



## **5. Social and Team-Building Opportunities**

- **Challenges:** Past attempts at in-person celebrations had low attendance and high cost; hybrid participation remains uneven.
- **Ideas:**
  - Consider smaller, cost-effective gatherings tied to existing Board meetings.
  - Explore inclusive social activities for hybrid settings (e.g., mailed treat boxes, virtual tasting events).
  - Recognize that some Board Members choose remote participation for personal or professional reasons.

## **6. Artificial Intelligence in Governance**

- **Observation:** Increasing discussions on AI use in boardrooms.
- **Plan:**
  - A half-day special Board meeting (likely November) will cover both governance self-evaluation results and AI in governance.
  - Paul Smith (conference speaker and author on AI in boardrooms) will attend the AI session.
  - Commitment to update the Board in advance with details of the session.



**AUGUST 12, 2025**

**1. Agenda: Discussion vs. Dialogue**

- **Proposal:** Define agenda outcome types (Inform, Discuss, Dialogue/Generative, Decision) and time guidance in the Relevant Board Policy.
- **Purpose:** Match process to intent; protect time for deliberation where it is needed.
- **Next Step:** Policy revision (if needed); pilot on the next agenda.

**2. Exit Interviews for Departing Board Members**

- **Proposal:** Introduce an optional, standardized exit interview for all departing Board Members.
- **Purpose:** Capture lessons learned while managing confidentiality and reputational risk.
- **Next Step:** Approve a short question set; route synthesized insights to closed session via Registrar & CEO; publish anonymized themes when appropriate.

**3. Board/Meeting Evaluations (Internal)**

- **Proposal:** Move routine Board/meeting evaluations in-house using SurveyMonkey.).
- **Purpose:** Speed, consistency, Canadian data residency; feed the Governance Scorecard.
- **Next Step:** Launch a 4–6 item post-meeting pulse linked to reimbursement email; monthly roll-up to Scorecard.

**4. Expense Workflow**

- **Proposal:** Retain PDF-based expense form (not SurveyMonkey).
- **Purpose:** Reduce staff rework and formatting steps; keep a clean finance pipeline.
- **Next Step:** No change; confirm process in the procedure manual.



## **5. Reciprocal Mentorship**

- **Proposal:** Pair each new Board Member with an experienced member for two-way learning; add basic structure.
- **Purpose:** Accelerate onboarding; build culture and capability.
- **Next Step:** Draft a one-page role/expectation guide; set check-ins at 1, 3, and 6 months; (explore advice from Lindsay Grillet).

## **6. Leadership Pathways & Succession**

- **Proposal:** Clarify readiness criteria for Chair/Vice-Chair/EC roles (vice-chair prerequisite or alternatives).
- **Purpose:** Make advancement transparent; support intentional leadership development.
- **Next Step:** Map criteria and pathways; incorporate into a Succession Planning.

## **7. Psychological Safety & Meeting Norms**

- **Proposal:** Add psych-safety items to self-assessment and a brief “rules of engagement” to agendas/orientation.
- **Purpose:** Sustain an open, respectful environment that encourages candid input.
- **Next Step:** Insert 2–3 survey items; publish a half-page norms sheet (e.g., no interruptions, curiosity before judgment).

## **8. Inclusion & Leadership Champion**

- **Proposal:** Pilot an in-meeting “Inclusion & Leadership Champion/Monitor” (potentially assigned to Vice-Chair).
- **Purpose:** Prompt inclusive practices in real time; connect EDIJ policy to boardroom behavior.
- **Next Step:** Draft a light role profile (observe/prompt/not control); test for one meeting cycle.



## **9. Consent Agenda Discipline & Generative Time**

- **Proposal:** Expand consent usage and reserve a fixed block for generative/strategic dialogue (target 20–30%).
- **Purpose:** Free time for the highest-value Board work.
- **Next Step:** Tighten consent criteria; pre-sort items earlier; track percentage of agenda time achieved.

## **10. Policy Champion Role—Refresh**

- **Proposal:** Assign fixed annual policy portfolios with expectations (pre-meeting scan, in-meeting vigilance, post-meeting follow-up).
- **Purpose:** Ensure living-policy oversight and stronger alignment during meetings.
- **Next Step:** Issue a one-page responsibility sheet; confirm assignments for the year.

## **11. Question-Asking Boundaries (Micro-Training)**

- **Proposal:** Provide a one-pager and short module on governance-aligned questions vs. operational curiosity.
- **Purpose:** Encourage engagement while avoiding operational drift; build confidence to ask the right questions.
- **Next Step:** Create examples/non-examples; add to orientation and pre-meeting materials.

## **12. Board “HR” Function (Name & Mandate)**

- **Proposal:** Establish/rename a committee responsible for Board-managing-the-Board (onboarding, education, evaluations, exits, succession, mentorship, policy champions).
- **Purpose:** Put ownership for Board member lifecycle clearly with the Board (not management).
- **Next Step:** Approve mandate/name (e.g., Board Development & Governance Committee); define interfaces with Registrar & CEO.



### **13. Innovation & Safe-to-Fail for CEO**

- **Proposal:** Encourage scoped pilots with light guardrails (risks, success criteria, learning review).
- **Purpose:** Enable responsible experimentation and organizational learning.
- **Next Step:** Adopt a one-page pilot charter template; schedule brief learning debriefs to the Board.



## **AGENDA ITEM 5.0**

<b>5.0</b>	<b>GOVERNANCE PROCESS: BOARD ORIENTATION / CONTINUING LEARNING / POLICY DEVELOPMENT (CONTINUED)</b>
5.1	Overview of Artificial Intelligence: Opportunities, Risks, and Emerging Trends
5.2	Advancing Responsible Artificial Intelligence at CMLTO: Strategy & Governance
5.3	Advancing Responsible Artificial Intelligence at CMLTO: Implementation Plan



## Briefing Report to Board of Directors

**Date** : November 14, 2025

**From** : John Tzountzouris, Registrar & CEO  
Maggie Cakar, Governance Specialist

**Subject** : Advancing Responsible Artificial Intelligence at CMLTO: Strategy & Governance

- |   |   |
|---|---|
| <input type="checkbox"/> Board Policy Development/Enhancement | <input type="checkbox"/> Monitoring Report                              |
| <input type="checkbox"/> Regular Policy Review                | <input type="checkbox"/> Ends   |
| <input type="checkbox"/> Policy Approval                      | <input type="checkbox"/> Executive Limitations                          |
| <input type="checkbox"/> Ends Policy                          | <input type="checkbox"/> Statutory Committee                            |
| <input type="checkbox"/> Executive Limitations Policy         | <input type="checkbox"/> Ownership Linkage Report                       |
| <input type="checkbox"/> Board-CEO Relationship Policy        | <input type="checkbox"/> <b>Incidental Report</b>                       |
| <input type="checkbox"/> Governance Process                   | <input type="checkbox"/> Registrar & CEO                                |
| <input type="checkbox"/> Board Implementation of Policy       | <input type="checkbox"/> Board Chair                                    |
| <input type="checkbox"/> Board-CEO Relationship Policy        | <input checked="" type="checkbox"/> <b>Other: Governance Specialist</b> |
| <input type="checkbox"/> Governance Process                   |   |

### **PUBLIC INTEREST:**

The CMLTO Artificial Intelligence (AI) Strategy, Governance Framework, and Implementation Plan serve the public interest by ensuring that the College's use of AI is ethical, transparent, and aligned with its statutory mandate to protect the public. Through clear boundaries, oversight mechanisms, and human-in-the-loop safeguards, the Board ensures that AI enhances regulatory effectiveness while maintaining fairness, accountability, and public confidence.

### **BACKGROUND:**

In September 2024, the Board proactively approved [\*\*Governance Process Policy IV-180: Board Use of Generative Artificial Intelligence\*\*](#), establishing foundational principles for the ethical and transparent use of AI by the Board.

This policy recognized the growing influence of AI technologies on governance, regulation, and operations, and articulated key principles—**transparency, fairness, accountability, privacy, and human oversight**—to ensure that AI enhances rather than undermines public protection and regulatory integrity.

To proceed with the responsible implementation of AI across the CMLTO, it is essential that CMLTO first establish an **AI Strategy** to define the vision, guiding

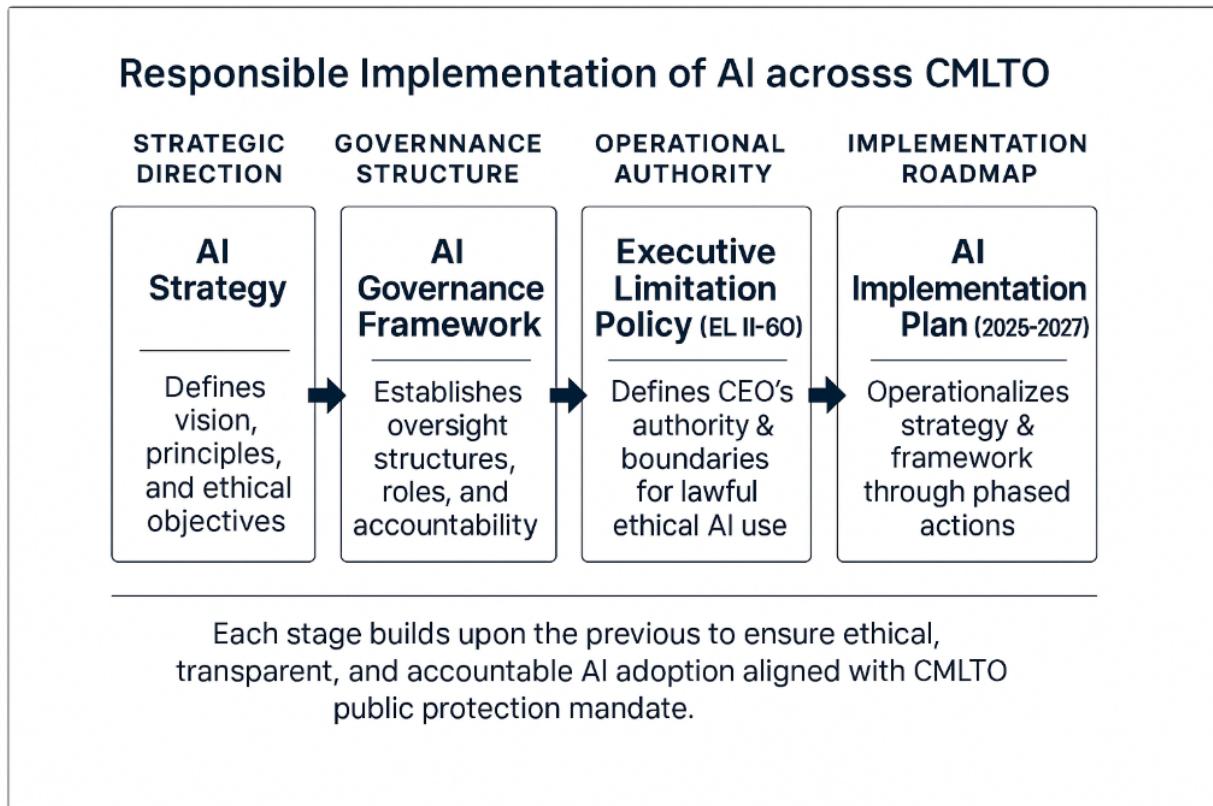


principles, and objectives for ethical and transparent AI use. This should be followed by the development of an **AI Governance Framework** to set out the oversight structures, roles, and accountability mechanisms required for implementation. The **Executive Limitation Policy** will then define the boundaries within which the Registrar & CEO may operationalize AI, ensuring compliance with Board-approved principles and legal obligations. Finally, the **AI Implementation Plan (2025–2027)** will provide a phased roadmap for putting these instruments into practice, ensuring that AI adoption occurs responsibly, transparently, and in alignment with CMLTO's public protection mandate.

Building on this foundation, the following documents are being presented to the Board for **review and approval**:

- **Appendix 2 – CMLTO Artificial Intelligence (AI) Strategy (for approval)**
- **Appendix 3 – CMLTO Artificial Intelligence (AI) Governance Framework (for approval)**
- **Appendix 4 – Draft EL II-60 Use of AI Policy (for approval)**

**FIGURE 1**



Together, these four instruments establish a complete and integrated architecture for responsible AI governance at the CMLTO. They ensure that AI adoption is



guided by clear ethical principles, legal compliance, and transparent oversight—reinforcing CMLTO's commitment to protect the public while advancing responsible modernization.

To support the Board's review and understanding of these new instruments, a guidance document titled "**CMLTO AI Strategy 2025: Responsible Governance, Regulatory Modernization, and Public Protection**" (posted on the CMLTO Board Portal as Appendix 1) has been developed. This comprehensive reference provides background information, definitions, global and national regulatory context, ethical considerations, and an overview of AI's potential applications in governance and regulation.

The CMLTO Board Members are encouraged to review this document in advance of considering the above-mentioned materials, as it provides the strategic foundation and context that inform them.

CMLTO's approach to AI governance is guided by applicable legislation and ethical frameworks, including the *Regulated Health Professions Act (RHPA), 1991*, PHIPA, PIPEDA, and FIPPA, as well as Ontario's Human Rights Code and the Canadian Human Rights Act. These laws collectively ensure that all AI use within CMLTO upholds fairness, transparency, privacy, and procedural due process in alignment with its public protection mandate.

**Chart 1**  
**CMLTO Artificial Intelligence Governance Document Hierarchy and Alignment**

Document	Purpose	Approved by
AI Strategy	Sets the vision, principles, and objectives for responsible AI use across CMLTO governance and operations.	Board
AI Governance Framework	Defines the structure, roles, risk-tiering, and accountability mechanisms for AI oversight and compliance.  Describes the <b>governance architecture</b> for all AI activities (Board, CEO, staff)—oversight bodies, risk tiers, monitoring cadence, etc.	Board
Governance Process Policy IV-180: Board Use of	Governs <b>how the Board itself</b> uses AI.	Board



Document	Purpose	Approved by
<b>Generative Artificial Intelligence</b>	Sets ethical expectations and risk management principles for <b>Board decision-making</b> .	
<b>Executive Limitation Policy: EL II-60 Use of Artificial Intelligence (AI) Policy</b>	Delegates authority to the Registrar & CEO, defining the boundaries for lawful, ethical, and responsible AI use within operations.	Board
	Defines <b>how the Registrar &amp; CEO manages AI within the organization</b> , consistent with the Board's policies and principles.	
<b>Statutory Committee Policy on AI</b>	Standards for AI use in statutory committees (Statutory Committees apply AI tools in alignment with the principles of the CMLTO Artificial Intelligence (AI) Strategy)	Board
<b>AI Implementation Plan (2025–2027)</b>	Operationalizes the AI Strategy and Governance Framework through phased actions under the Registrar & CEO's authority.	Registrar & CEO (reported to Board)

## **1. PROPOSED CMLTO ARTIFICIAL INTELLIGENCE (AI) STRATEGY**

The proposed **CMLTO Artificial Intelligence (AI) Strategy** in Appendix 2 defines the CMLTO's overarching vision, objectives, and guiding principles for responsible and ethical AI adoption.

It establishes CMLTO's long-term commitment to ensuring that any use of AI directly supports its public protection mandate and regulatory modernization goals.

The Strategy articulates how AI will be used to:

- Strengthen decision-making and risk management,
- Enhance efficiency and regulatory effectiveness,
- Promote transparency, fairness, and accountability, and
- Build internal capability for responsible innovation.

The Strategy forms the Board's high-level direction for AI use across governance and operations.



**The CMLTO Board Members are requested to consider approving CMLTO Artificial Intelligence (AI) Strategy in Appendix 2 to enable the CMLTO to establish a clear, principle-based foundation for the responsible and transparent use of artificial intelligence across all levels of governance and operations.**

**Motion 1 – Approval of the CMLTO Artificial Intelligence (AI) Strategy**

Be it resolved that the CMLTO Board moves to approve the ***CMLTO Artificial Intelligence (AI) Strategy*** presented in Appendix 2, establishing the CMLTO's strategic vision, guiding principles, and objectives for responsible, ethical, and transparent AI adoption.

**2. PROPOSED CMLTO ARTIFICIAL INTELLIGENCE (AI) GOVERNANCE FRAMEWORK**

Building on the CMLTO Artificial Intelligence (AI) Strategy, the next step is to establish the formal governance structures required to operationalize the Strategy's vision and principles.

The **CMLTO Artificial Intelligence (AI) Governance Framework** translates the CMLTO Artificial Intelligence (AI) Strategy and strategic vision into governance mechanisms and accountability structures.

The Framework defines how oversight, risk management, and ethical review will be operationalized through:

- Defined roles and responsibilities (Board, the Registrar & CEO, and staff),
- A risk-tiered model for AI oversight,
- Requirements for transparency, data governance, bias mitigation, and human oversight, and
- Procedures for monitoring, auditing, and reporting AI use and outcomes.

This Framework ensures that governance systems are in place to maintain public trust, accountability, and compliance with relevant legislation (RHPA, PHIPA, PIPEDA, and AIDA, once enacted). While developed specifically for CMLTO's regulatory and governance context, the Framework is consistent with emerging international and national standards for responsible AI governance.

**The CMLTO Board Members are requested to consider approving the CMLTO Artificial Intelligence (AI) Governance Framework in Appendix 3, which establishes**



the oversight structures, roles, and accountability mechanisms required to ensure the ethical, transparent, and legally compliant implementation of artificial intelligence across all areas of CMLTO governance and operations.

**Motion 2 – Approval of AI Governance Framework**

Be it resolved that the CMLTO Board moves to approve the ***CMLTO Artificial Intelligence (AI) Governance Framework*** presented in Appendix 3, defining the governance structure, oversight responsibilities, and risk-tiered accountability mechanisms for the use of AI in CMLTO operations and governance.

**3. PROPOSED EXECUTIVE LIMITATIONS EL II-60 USE OF ARTIFICIAL INTELLIGENCE (AI) POLICY**

Artificial Intelligence (AI) introduces significant opportunities for improving efficiency and regulatory insight but also presents ethical, operational, and legal risks that require clear governance boundaries. These include:

- **Data Privacy and Security:** Ensuring lawful collection, storage, and use of personal data, and maintaining cybersecurity controls to prevent breaches.
- **Ethical and Fair Use:** Preventing bias, safeguarding transparency, and maintaining accountability and human oversight in all AI-assisted activities.
- **Regulatory Compliance:** Aligning AI practices with evolving legislative frameworks such as the RHPA, PHIPA, PIPEDA, and Canada's forthcoming Artificial Intelligence and Data Act (AIDA).
- **Operational and Reputational Risk:** Avoiding AI failures, misuse, or vendor dependencies that could undermine public confidence or disrupt regulatory functions.
- **Social and Environmental Considerations:** Managing broader societal and sustainability impacts associated with AI deployment.

Recognizing these risks, the **Executive Limitation EL II-60 Use of Artificial Intelligence (AI) Policy** delegates authority to the **Registrar & CEO** to implement and manage AI systems **within clearly defined ethical, legal, and governance boundaries** established by the Board.

This Policy:

- Establishes the **boundaries of acceptable conduct** for AI use under the Board's Policy Governance Model,



- Ensures **human oversight and traceability** in all AI-assisted decisions,
- Requires **compliance with applicable legislation, privacy laws, and Board-approved governance standards**, and
- Mandates **ongoing risk management, capability development, and reporting to the Board**.

Through this limitation, the Board ensures that AI is implemented in a way that **enhances regulatory effectiveness while protecting fairness, accountability, and public trust** in direct alignment with the **CMLTO Artificial Intelligence (AI) Governance Framework and AI Implementation Plan (2025–2027)**.

**The CMLTO Board Members are requested to consider approving the Executive Limitations EL II-60 Use of Artificial Intelligence (AI) Policy in Appendix 4 to formally delegate authority to the Registrar & CEO for the implementation and management of AI systems within clearly defined ethical, legal, and governance boundaries established by the Board, ensuring accountability, transparency, and alignment with CMLTO's statutory public protection mandate.**

**Motion 3 – Approval of Executive Limitations EL II-60 Use of Artificial Intelligence (AI) Policy**

Be it resolved that the CMLTO Board moves to approve the ***EL II-60 Use of Artificial Intelligence (AI) Policy*** presented in Appendix 4, delegating authority to the Registrar & CEO to implement AI systems within the ethical, legal, and operational parameters established by the Board.

**4. SPECIAL POLICY REVIEW: GOVERNANCE PROCESS GP IV-180 – BOARD USE OF GENERATIVE ARTIFICIAL INTELLIGENCE POLICY**

To ensure continued alignment across CMLTO's AI governance instruments, **Governance Process Policy GP IV-180 – Board Use of Generative Artificial Intelligence Policy** will undergo a **special policy review in 2026**. This review will assess the policy's consistency with the CMLTO Artificial Intelligence (AI) Strategy, the AI Governance Framework, and emerging best practices in the ethical and responsible use of AI.

**CONCLUSION**

Collectively, these governance instruments demonstrate the Board's proactive leadership in defining clear ethical and operational parameters for emerging technologies.



## NEXT STEPS

Upon the Board's approval of the CMLTO Artificial Intelligence (AI) Strategy, AI Governance Framework, and Executive Limitation EL II-60 Use of Artificial Intelligence (AI) Policy, the Registrar & CEO will operationalize the CMLTO Artificial Intelligence (AI) Implementation Plan (2025–2027) (to be addressed in Agenda Item 5.3), under the authority of Executive Limitation EL II-60 Use of Artificial Intelligence (AI). This will ensure that all activities align with the CMLTO Artificial Intelligence (AI) Governance Framework and the CMLTO's statutory and ethical obligations. Progress will be reported to the Board through regular monitoring updates and annual compliance reports.

These steps will enable a measured, transparent, and accountable rollout of Artificial Intelligence across CMLTO governance and operations—strengthening regulatory effectiveness, fostering innovation, and upholding the CMLTO's public protection mandate.

## APPENDICES:

**Appendix 1 – CMLTO AI Strategy 2025: Responsible Governance, Regulatory Modernization, and Public Protection** (*Posted on CMLTO Board Portal as a stand-alone document*)

**Appendix 2 – CMLTO Artificial Intelligence (AI) Strategy**

**Appendix 3 – CMLTO Artificial Intelligence (AI) Governance Framework**

**Appendix 4 – Draft Executive Limitations EL II-60 Use of Artificial Intelligence (AI) Policy**



## CMLTO ARTIFICIAL INTELLIGENCE (AI) STRATEGY

*Advancing Responsible, Ethical, and Strategic Use of Artificial Intelligence in Regulation and Governance*

### 1. PURPOSE

The purpose of the CMLTO Artificial Intelligence (AI) Strategy is to establish a clear and principled direction for the ethical, transparent, and effective use of artificial intelligence within the CMLTO's regulatory and governance functions.

The CMLTO Artificial Intelligence (AI) Strategy aligns with CMLTO's statutory mandate to protect the public by ensuring that all AI applications and decisions serve the public interest, enhance regulatory effectiveness, and uphold fairness, accountability, and human oversight.

This AI Strategy establishes the overarching vision and direction for CMLTO's use of Artificial Intelligence. It is supported by the:

1. CMLTO Artificial Intelligence (AI) Governance Framework,
2. CMLTO Governance Process Policy IV-180 Board Use of Generative Artificial Intelligence,
3. CMLTO Executive Limitation Policy EL II-60 Use of Artificial Intelligence (AI), and
4. CMLTO Artificial Intelligence (AI) Implementation Plan (2026–2027).

### 2. STRATEGIC VISION

CMLTO envisions becoming a digitally enabled and data-informed regulator that uses AI responsibly to:

- Strengthen public protection and regulatory excellence,
- Improve the quality, timeliness, and consistency of decisions,
- Enhance transparency and stakeholder confidence, and
- Build organizational capacity for innovation and evidence-based governance.

AI will be used **as an assistive and augmentative tool**, never as a substitute for human judgment or accountability.



### 3. STRATEGIC OBJECTIVES

The CMLTO Artificial Intelligence (AI) Strategy establishes the following objectives:

#### 1. Support Regulatory Effectiveness

Apply AI to strengthen decision support in registration, quality assurance, and professional conduct processes.

#### 2. Enhance Operational Efficiency

Automate routine and administrative processes to improve responsiveness and resource utilization.

#### 3. Advance Data-Informed Governance

Enable data analytics and AI-assisted insights to support Board and management decision-making.

#### 4. Ensure Responsible, Ethical, and Compliant Use

Govern all AI use in accordance with human rights, privacy, and emerging AI legislation (including PHIPA, PIPEDA, RHPA, and the Artificial Intelligence and Data Act).

#### 5. Promote Transparency and Public Trust

Ensure that AI systems and their outcomes are explainable, traceable, and publicly disclosed in an accessible manner.

#### 6. Build Organizational Capacity and Readiness

Invest in staff and leadership training to ensure digital literacy, ethical awareness, and readiness for responsible innovation.

### 4. GUIDING PRINCIPLES

CMLTO's approach to artificial intelligence will be governed by the following principles, ensuring that all AI use remains ethical, transparent, and aligned with CMLTO's statutory mandate to protect the public:



**Figure 1**  
**CMLTO Artificial Intelligence (AI) Guiding Principles**

Principle	Description
<b>Transparency</b>	AI systems must be explainable, with clear public disclosures about their purpose, design, and limitations.
<b>Fairness and Equity</b>	CMLTO will take proactive measures to identify and mitigate bias, promote inclusivity, and ensure equitable outcomes for all stakeholders.
<b>Accountability and Human Oversight</b>	Human decision-makers remain responsible for all regulatory and governance outcomes; human-in-the-loop <sup>1</sup> review is required for all high-stakes or high-impact decisions.
<b>Compliance</b>	All AI activities must align with applicable laws, regulations, and standards, including RHPA, PHIPA, PIPEDA, AIDA (once enacted), and relevant Board policies.
<b>Privacy and Security</b>	Data used in AI systems must be collected, processed, and stored with robust safeguards to ensure confidentiality, integrity, and cybersecurity.
<b>Purpose-Driven Innovation</b>	AI use must directly advance CMLTO's strategic priorities, modernization objectives, and public protection mandate.
<b>Application of AI Across Governance and Statutory Functions</b>	AI use within CMLTO extends to all governance and operational areas, including support functions for Statutory Committees.  Any AI tools used in committee processes—such as data organization, case tracking, or analytics—must preserve procedural fairness, confidentiality, and the right to human decision-making. Decisions affecting registrant rights or public protection shall remain under the direct authority of human decision-makers, with AI serving only as an informational or analytical aid.

**CMLTO affirms that all AI use will remain subject to human judgment and accountability, ensuring that technology supports, but never replaces, human decision-making.**

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<sup>1</sup> [Human-in-the-loop \(HITL\)](#) refers to a system or process in which a human actively participates in the operation, supervision or decision-making of an automated system. In the context of AI, HITL means that humans are involved at some point in the AI workflow to ensure accuracy, safety, accountability or ethical decision-making.



## 5. GOVERNANCE AND OVERSIGHT STRUCTURE

CMLTO's governance and oversight of Artificial Intelligence are anchored in the **CMLTO AI Governance Framework**, which establishes the structures, roles, processes, and safeguards required to ensure that AI use across the College remains ethical, transparent, compliant, and aligned with CMLTO's statutory mandate to protect the public.

This governance structure operates through five (5) interrelated components that ensure accountability, proportional oversight, and continuous improvement:

- 1. CMLTO AI Strategy:** Establishes the overall vision, objectives, and guiding principles for the responsible and ethical use of AI across CMLTO's governance and operations.
- 2. CMLTO AI Governance Framework:** Defines the governance architecture, roles, and accountabilities for oversight, including the Board of Directors, and Registrar & CEO. It sets risk-tiered controls, decision authorities, and monitoring mechanisms.
- 3. CMLTO Governance Process Policy - GP IV-180: Board Use of Generative Artificial Intelligence:** Establishes the ethical standards and transparency principles governing the Board's own use of AI tools for governance purposes (e.g., information synthesis, research, or decision support), ensuring alignment with the CMLTO Artificial Intelligence (AI) Strategy and CMLTO Artificial Intelligence (AI) Governance Framework.
- 4. CMLTO Executive Limitation Policy (EL II-60 Use of Artificial Intelligence):** Delegates authority to the Registrar & CEO to implement and manage AI systems within defined ethical, legal, and operational boundaries approved by the Board.
- 5. CMLTO AI Implementation Plan (2026–2027):** Operationalizes the CMLTO AI Strategy and CMLTO Governance Framework through phased actions that build capacity, establish oversight mechanisms, and support continuous improvement.

Under this governance model:

- **The Board of Directors** approves the CMLTO Artificial Intelligence (AI) Governance Strategy, CMLTO Artificial Intelligence (AI) Governance Framework, and Executive Limitation Policy, defines ethical



boundaries and public-interest expectations, and monitors implementation outcomes through regular reports and audits.

- **The Registrar & CEO**, as the accountable executive, oversees AI implementation in accordance with the EL Policy, ensuring compliance with applicable legislation and Board policy.
- **Statutory Committees** may apply AI tools only as decision-support mechanisms, ensuring procedural fairness, confidentiality, and human oversight in all decisions.

This integrated governance structure ensures that AI use within the CMLTO is both innovative and accountable, guided by ethical principles, legal compliance, and human oversight at every stage of design, deployment, and decision-making.

## 6. IMPLEMENTATION AND REPORTING

Implementation of the CMLTO Artificial Intelligence (AI) Strategy will be guided by the **CMLTO Artificial Intelligence (AI) Implementation Plan (2026–2027)**, which outlines phased actions, milestones, and deliverables for responsible adoption across governance and operations.

The Registrar & CEO will:

- Ensure all AI systems comply with the CMLTO Artificial Intelligence (AI) Governance Framework and EL II-60 Use of Artificial Intelligence (AI) Policy,
- Provide annual AI progress and compliance reports to the Board, and
- Adjust implementation based on evolving legislation, ethical standards, and lessons learned.

The CMLTO Board will receive:

- Annual AI Governance Reports on compliance, ethics, and outcomes, and
- Periodic updates on emerging regulatory or technological risks.

## 7. EXPECTED OUTCOMES

By implementing this Strategy, the CMLTO will:

- Strengthen its capacity to regulate effectively in a data-rich environment,



- Improve the fairness, efficiency, and transparency of its processes,
- Affirm CMLTO's role as a forward-thinking regulator committed to ethical AI governance,
- Build a culture of responsible innovation that safeguards the public interest.

## **8. REVIEW AND RENEWAL**

The CMLTO Artificial Intelligence (AI) Strategy will be reviewed at least every three (3) years or sooner if required by legislative change, emerging risk, or technological advancement.

The CMLTO Board will renew or update the CMLTO Artificial Intelligence (AI) Strategy to ensure continued alignment with CMLTO's strategic priorities and mandate.



## CMLTO ARTIFICIAL INTELLIGENCE (AI) GOVERNANCE FRAMEWORK

### 1. PURPOSE

The CMLTO Artificial Intelligence (AI) Governance Framework establishes the structures, roles, processes, and safeguards necessary to ensure that the CMLTO's use of artificial intelligence (AI) is ethical, transparent, compliant, and aligned with its statutory mandate to protect the public.

This Framework operationalizes the CMLTO Artificial Intelligence (AI) Strategy and serves as the governance foundation for both the CMLTO Artificial Intelligence (AI) Implementation Plan (2025–2027) and the Executive Limitation on the Use of Artificial Intelligence.

It functions within CMLTO's Policy Governance structure, aligning with **Governance Process GP IV-180 Board Use of Generative Artificial Intelligence Policy** and **Executive Limitations EL II-60 Use of Artificial Intelligence Policy**. Together, these instruments define the Board's governance expectations and the Registrar & CEO's operational boundaries for the ethical, transparent, and accountable use of AI.

### 2. OBJECTIVES

The objectives of the CMLTO Artificial Intelligence (AI) Governance Framework are to:

- Define clear governance accountabilities for AI-related decision-making, implementation, and oversight,
- Establish risk-tiered controls for all AI systems used in regulatory, governance, and operational functions,
- Ensure compliance with applicable legislation, including the RHPA, PHIPA, PIPEDA, and the AIDA (once enacted),
- Promote transparency, fairness, and human oversight throughout the lifecycle of all AI applications, and
- Enable continuous monitoring, auditing, and improvement of AI use to maintain trust, integrity, and accountability.

### 3. SCOPE

CMLTO Artificial Intelligence (AI) Governance Framework applies to all AI systems, tools, or services:

- Developed, procured, or deployed by CMLTO or its vendors,



- Used to guide or assist in regulatory, operational, or governance processes, and
- That process data relating to registrants, applicants, staff, or the public.

It encompasses all machine learning models, natural language processing tools, predictive analytics, generative systems, and decision-support applications used by or on behalf of the CMLTO.

#### **4. GUIDING PRINCIPLES**

All AI governance decisions under this Framework shall adhere to the principles defined in the CMLTO Artificial Intelligence (AI) Strategy, including:

- Transparency
- Fairness and Equity
- Accountability and Human Oversight
- Compliance
- Privacy and Security
- Purpose-Driven Innovation

These principles collectively ensure that every AI-related activity undertaken by the CMLTO upholds ethical integrity, public trust, and alignment with the College's statutory mandate to protect the public.

#### **5. GOVERNANCE STRUCTURE AND ROLES**

The governance of AI within the CMLTO operates through a clearly defined structure that assigns distinct responsibilities to the Board of Directors, committees, management, and operational teams. This ensures that all AI activities are guided by ethical principles, legal compliance, and public accountability.

The table below outlines the key governance roles and responsibilities that collectively uphold transparency, fairness, and oversight throughout the lifecycle of AI use within the CMLTO.



**TABLE 1**  
**AI Governance Structure and Accountability Roles**

Entity / Role	Primary Responsibilities
Board of Directors	<ul style="list-style-type: none"><li>• Approves the AI Strategy, Governance Framework, Governance Process Policy and Executive Limitations Policy on use of AI.</li><li>• Defines ethical boundaries and public-interest expectations.</li><li>• Receives annual AI governance and compliance reports.</li><li>• Ensures AI use aligns with CMLTO's High Level Ends Policies and statutory mandate.</li></ul>
Registrar & CEO	<ul style="list-style-type: none"><li>• Serves as accountable executive has authority for AI implementation under the Executive Limitations EL II-60 Use of Artificial Intelligence (AI) Policy.</li><li>• Ensures compliance with the CMLTO Artificial Intelligence (AI) Governance Framework, applicable legislation, and Board policies.</li><li>• Establishes and maintains the AI Governance Toolkit<sup>1</sup> and operational processes.</li><li>• Provides annual AI compliance and performance reports to the Board.</li></ul>
Statutory Committees	<ul style="list-style-type: none"><li>• Apply AI tools strictly as decision-support mechanisms within their statutory mandates.</li><li>• Ensure AI use supports procedural fairness, confidentiality, and due process, with all final determinations made by human committee members.</li><li>• Report any AI-related issues or incidents to the AI Oversight Committee through the Registrar.</li></ul> <p><b>Note:</b> Statutory Committees apply AI tools in alignment with the CMLTO AI Strategy's guiding principles.</p>
IT & Data Governance Team	<ul style="list-style-type: none"><li>• Implements technical standards for cybersecurity, data protection, and system monitoring.</li></ul>

<sup>1</sup> The **AI Governance Toolkit** is a collection of standardized tools, templates, and operational resources that support the consistent, ethical, and accountable implementation of AI across CMLTO's governance and operations. It ensures that all AI systems are documented, assessed, monitored, and reported in alignment with the CMLTO Artificial Intelligence (AI) Governance Framework and the Executive Limitation EL II-60 Use of Artificial Intelligence (AI) Policy.



Entity / Role	Primary Responsibilities
	<ul style="list-style-type: none"><li>• Maintains the AI Register<sup>2</sup> and model inventory.</li><li>• AI Impact Assessments (AIAs) and</li><li>• Supports bias testing, audit logging, and drift monitoring.</li></ul>
Legal Counsel / Privacy Officer	<ul style="list-style-type: none"><li>• Ensures legal and privacy compliance with PHIPA, PIPEDA, RHPA, and AIDA.</li><li>• Reviews AIAs and approves mitigation plans for high-risk systems.</li><li>• Oversees data protection, consent, and information-sharing protocols.</li></ul>
Programs and Operations <sup>3</sup>	<ul style="list-style-type: none"><li>• Identify AI use cases aligned with strategic and regulatory priorities.</li><li>• Ensure human-in-the-loop processes in all critical decisions (e.g., registration, QA, complaints).</li><li>• Participate in training and governance reviews.</li></ul>
Human Resources / Learning & Development	<ul style="list-style-type: none"><li>• Lead AI literacy and change-management initiatives.</li><li>• Track organizational readiness and cultural adoption metrics.</li></ul>
External Auditors / Consultants	<ul style="list-style-type: none"><li>• Conduct periodic independent AI ethics and compliance audits.</li><li>• Validate accuracy, fairness, and transparency of systems per risk-tiering model.</li></ul>

To complement the governance roles outlined above, the following tiered risk model ensures that oversight intensity corresponds to the potential impact and sensitivity of each AI system, promoting proportional governance and accountability across all applications.

## 6. AI RISK-TIERING AND OVERSIGHT CONTROLS

CMLTO applies a three-tier AI risk model to ensure proportional oversight and accountability.

<sup>2</sup> AI Register: Inventory of all AI systems (purpose, owner, data sources, risk tier, and approval status).

<sup>3</sup> Programs and Operations comprise the CMLTO's regulatory and operational divisions—such as Registration, Quality Assurance, Professional Conduct, and Corporate Services—responsible for implementing regulatory programs and operationalizing AI use in alignment with CMLTO's strategic priorities, public protection mandate, and Board-approved policies.



The CMLTO AI Risk-Tiering Model establishes a structured approach to evaluating and managing the level of oversight required for any AI system used within the College.

Its purpose is to ensure that higher-risk AI tools, those that could impact registrant rights, public protection, or regulatory decisions, receive greater scrutiny, documentation, and oversight, while lower-risk tools are managed with proportionate controls.

The model is divided into three tiers, based on impact, sensitivity, and use context:

**TABLE 2**  
**CMLTO AI Risk-Tiering Model**

Tier	Description	Approval / Oversight	Review Frequency
<b>Tier 1 – Low Impact</b>	Internal productivity or administrative tools (e.g., meeting transcription, document tagging).	Department Lead & Registrar & CEO	Annual
<b>Tier 2 – Moderate Impact</b>	Tools influencing registrant or staff experience, or compliance tracking (not determinative).	Registrar & CEO	Semi-annual & drift checks
<b>Tier 3 – High Impact</b>	Tools affecting registration, complaints, QA, discipline, or public-risk monitoring.	Registrar & CEO	Regularly scheduled audit

**Escalation Rule:** Any new data type, expanded scope, or novel AI model automatically triggers a higher tier and fresh review.

This three-tier system ensures **proportional governance**, meaning:

- Oversight scales with risk,
- Accountability remains clear at each level, and
- The Board can have confidence that **no AI tool operates without appropriate review, documentation, and human oversight**.

## **7. CORE GOVERNANCE ARTIFACTS (GOVERNANCE TOOLKIT)**

To ensure traceability, accountability, and consistent oversight, CMLTO will maintain a standardized set of governance artifacts for all AI systems as part of its AI Governance Toolkit.



All AI initiatives must produce and maintain the following standardized governance artifacts, which will form part of the Governance Toolkit (Phase 1 deliverable of the CMLTO Artificial Intelligence (AI) Implementation Plan):

- **AI Register:** Inventory of all AI systems (purpose, owner, data sources, risk tier, status).
- **AI Impact Assessment (AIIA):** Legal, ethical, privacy, security, and oversight evaluation.
- **Model Card / System Card:** One-page summary of model purpose, data, metrics, biases, and explainability.
- **Decision Record & Audit Log:** Traceable log of AI-assisted actions, human decisions, and rationales.
- **Transparency Notices:** Standardized communication templates for registrants and the public.
- **Human-in-the-Loop (HITL) Checklist:** Defines where human judgment is mandatory.
- **AI Incident Playbook:** Steps for containment, escalation, and communication in the event of an AI incident.
- **Vendor AI Addendum:** Procurement clause for audit rights, bias testing, data protection, and change notifications.

Findings from human oversight reviews, including documentation of human-in-the-loop decisions and contestations, will be integrated into the AI Monitoring Dashboard and used to inform bias testing, audit planning, and continuous improvement activities.

## 8. HUMAN OVERSIGHT AND DECISION AUTHORITY

CMLTO affirms that all AI-assisted processes shall remain subject to human judgment and accountability.

AI will be used to support, not replace, human decision-making in governance, regulatory, and operational contexts.



### Key Provisions:

- **Human-in-the-Loop (HITL):** Human review and validation are required at all stages where AI outputs influence decisions that may affect registrants, applicants, staff, or the public.
- **Decision Authority:** Final decisions, particularly those concerning registration, quality assurance, complaints, discipline, or investigations, rest solely with authorized human decision-makers (e.g., the Board, Statutory Committees, or the staff).
- **Escalation and Contestation:** While all decisions affecting registrants or applicants are made by human decision-makers, individuals must retain the right to appeal or request review of any decision that was informed or supported by AI analysis. All such reviews shall be overseen exclusively by human decision-makers.
- **Documentation:** The Decision Record and Audit Log must clearly indicate where and how human oversight occurred in each AI-assisted process.
- **Statutory Committees:** AI tools supporting committee work may be used only for administrative or analytical purposes (e.g., case tracking, trend analysis). Committees shall ensure all decisions maintain procedural fairness, confidentiality, and compliance with statutory requirements under the RHPA.

## 9. OVERSIGHT, MONITORING, AND AUDIT CADENCE

CMLTO will maintain an **AI Monitoring Dashboard** jointly managed by the **Registrar & CEO** and the **IT/Data Governance Team**. The Dashboard will track performance, fairness, security, and compliance metrics across all AI systems to ensure transparency, accountability, and continuous improvement.

**TABLE 3**  
**CMLTO AI Monitoring Dashboard**

Activity	Tier 1	Tier 2	Tier 3
Performance KPIs	Quarterly	Monthly	Monthly
Bias / Disparity Checks	Annual	Semi-annual	Quarterly
Security Review	Annual	Annual	Semi-annual
Legal / Privacy Re-Check	Annual	Annual	Semi-annual
Independent Audit	N/A	Biennial	Annual



CMLTO will use a structured Change Control review process—rather than a standing committee—to assess and approve any model retraining, data expansion, or material modification to ensure traceability and compliance with the AI Governance Framework.

## 10. ETHICS, EQUITY, AND BIAS MANAGEMENT

CMLTO is committed to ensuring that all AI systems operate in a manner that upholds fairness, equity, and human rights, consistent with its statutory mandate to protect the public. Fairness and equity assessments will be embedded throughout every stage of the AI lifecycle to prevent discriminatory or biased outcomes and to promote transparency and accountability.

Lifecycle Stages for Fairness and Bias Management:

- 1. Pre-Deployment:** Define fairness goals and protected groups.*(i.e., individuals or populations legally protected from discrimination under human rights legislation, such as those based on race, gender, age, or disability); complete dataset representativeness review (i.e., ensure that the data used to train or inform AI systems accurately reflects the diversity and characteristics of the population or conditions to which it will be applied).*
- 2. Validation:** Conduct disparity tests *(to identify and measure differences in AI outcomes across groups to detect potential bias); document trade-offs and mitigations (clearly record decisions made to balance competing priorities, such as accuracy versus fairness, and the rationale for each mitigation strategy).*
- 3. Monitoring:** Continuously assess outputs for bias drift and unintended consequences.
- 4. Redress:** Provide clear and accessible procedures for individuals to question, appeal, or request review of any decision informed by AI analysis, ensuring that all such reviews are conducted exclusively by human decision-makers.

All bias testing results, mitigation measures, and follow-up actions must be documented in the AI Register and reviewed by the Registrar & CEO as part of ongoing governance and compliance monitoring.

These measures collectively ensure that AI systems used by CMLTO operate with fairness, accountability, and in full alignment with human rights and public protection principles.



## 11. TRANSPARENCY AND PUBLIC COMMUNICATION

CMLTO will promote public confidence in its use of Artificial Intelligence (AI) through proactive transparency and communication measures designed to ensure accountability and public understanding.

CMLTO will:

- Maintain a public AI Use Disclosure Page listing all active AI systems, their purpose, oversight level, and responsible governance entity.
- Publish an Annual AI Transparency Report summarizing AI use, performance, audits, incidents, and mitigation actions.
- Provide accessible contact channels for inquiries, feedback, or appeals related to AI-assisted processes or decisions.

These transparency commitments ensure that the public can clearly understand how AI is used within CMLTO's regulatory and governance functions, reinforcing trust, accountability, and confidence in its operations.

## 12. TRAINING, CAPACITY, AND CHANGE MANAGEMENT

To ensure successful and responsible adoption of Artificial Intelligence (AI), CMLTO will build organizational capacity and foster a culture of ethical awareness, transparency, and continuous learning across all levels of the organization.

CMLTO will:

- Deliver regular AI literacy and ethics training for staff, Committee, and Board Members.
- Integrate AI governance responsibilities into role descriptions and performance expectations.
- Communicate openly about AI projects and developments through internal newsletters, learning sessions, and key party updates.

These measures will ensure that all individuals involved in CMLTO's regulatory and governance processes are equipped to apply AI responsibly, confidently, and in alignment with CMLTO's public protection mandate.



## 13. INTEGRATION WITH POLICY GOVERNANCE

The CMLTO Artificial Intelligence (AI) Governance Framework operates within CMLTO's Policy Governance Model, ensuring that AI oversight aligns with established Board–CEO accountability structures.

- **The Board** establishes strategic direction and ethical parameters through the CMLTO Artificial Intelligence (AI) Strategy, Governance Process Policy GP IV-180 Board Use of Generative Artificial Intelligence and the Executive Limitation Policy EL II-60 Use of Artificial Intelligence (AI).
- **The Registrar & CEO** implements and manages AI in accordance with this Framework and within the boundaries set by Board policy.
- **The Board** monitors compliance and performance through annual monitoring reports, independent audits, and reviews of the CMLTO Artificial Intelligence (AI) Implementation Plan.

## 14. CONTINUOUS IMPROVEMENT AND REVIEW

CMLTO will review this Artificial Intelligence (AI) Governance Framework **annually** through the AI Oversight Committee and update it as needed to reflect emerging legislation, evolving standards, technological advances, and organizational learnings.

Findings from audits, incidents, and performance evaluations will inform revisions to this Framework and the AI Implementation Plan to ensure ongoing alignment with best practices, ethical principles, and CMLTO's public protection mandate.

**Note:** The CMLTO Artificial Intelligence (AI) Governance Framework aligns with internationally recognized standards and principles for responsible AI, including the OECD AI Principles, ISO/IEC 42001:2024 Artificial Intelligence Management System Standard, and the Treasury Board of Canada's Directive on Automated Decision-Making.



**APPENDIX 4**  
**EXECUTIVE LIMITATIONS EL II-60 USE OF ARTIFICIAL INTELLIGENCE (AI) POLICY**

<b>Policy Title:</b> <b>USE OF ARTIFICIAL INTELLIGENCE (AI)</b>	<b>Policy Section:</b> II Executive Limitations	<b>Policy Number:</b> II-60	
<b>Approved By:</b> Board of Directors	<b>Date Approved:</b> Ready for November 21, 2025	<b>Date Reviewed/Revised:</b>	<b>Board Chair's Signature:</b>

### **BACKGROUND**

The Board of Directors is responsible for ensuring that the CMLTO's use of Artificial Intelligence (AI) supports its statutory mandate to protect the public while upholding the highest standards of ethics, transparency, and accountability.

EL II-60 Use of Artificial Intelligence (AI) Policy establishes the boundaries within which the Registrar & CEO shall implement AI systems, ensuring fairness, privacy, human oversight, and responsible innovation that enhances regulatory effectiveness and public trust.

### **POLICY PURPOSE**

EL II-60 Use of Artificial Intelligence (AI) Policy establishes delegates authority to the Registrar & CEO to manage and apply AI systems across CMLTO operations in alignment with the Board's Ends Policies, strategic objectives, and ethical and legal obligations. It also defines the boundaries and accountability mechanisms consistent with the CMLTO AI Strategy, AI Governance Framework, and AI Implementation Plan within which all AI activities must occur.

### **POLICY**

The Registrar & CEO shall not cause or allow the development, acquisition, or use of AI systems that compromise fairness, accountability, privacy, safety, or public confidence in the College's regulatory or governance functions.

This Policy shall be interpreted in conjunction with the CMLTO Artificial Intelligence (AI) Strategy and AI Governance Framework.

Accordingly, the Registrar & CEO shall not operate without:



## **Human Oversight and Decision Authority**

1. Ensuring that all AI systems include appropriate human oversight, review, and accountability in every decision affecting registrants, applicants, or the public,

## **Data Governance and Privacy**

2. Implementing safeguards to protect data integrity, privacy, and security in accordance with applicable laws and regulations,

## **Bias, Fairness, and Equity**

3. Conducting regular assessments to identify, prevent, and mitigate bias or inequitable outcomes in AI systems,

## **Transparency and Public Disclosure**

4. Maintaining transparency in all AI-related activities by documenting each system's purpose, risk level, and data sources,

## **Risk Management, Monitoring, and Reporting**

5. Establishing robust risk assessment, monitoring, and reporting mechanisms proportionate to each AI system's risk tier,

## **External Collaboration and Vendor Oversight**

6. Ensuring that all external vendors and partners meet contractual requirements for transparency, auditability, and data protection, and

## **Training and Capability Development**

7. Maintaining adequate organizational competence to manage AI systems responsibly.

## **References**

- CMLTO Artificial Intelligence (AI) Strategy
- CMLTO Artificial Intelligence (AI) Governance Framework
- Governance Process IV-180: Board Use of Generative Artificial Intelligence Policy
- CMLTO Artificial Intelligence (AI) Implementation Plan (2025–2027)



## Briefing Report to Board of Directors

**Date** : November 14, 2025

**From** : John Tzountzouris, Registrar & CEO  
Maggie Cakar, Governance Specialist

**Subject** : Advancing Responsible Artificial Intelligence at CMLTO:  
Implementation Plan

- |   |   |
|---|---|
| <input type="checkbox"/> Board Policy Development/Enhancement | <input type="checkbox"/> Monitoring Report                              |
| <input type="checkbox"/> Regular Policy Review                | <input type="checkbox"/> Ends   |
| <input type="checkbox"/> Policy Approval                      | <input type="checkbox"/> Executive Limitations                          |
| <input type="checkbox"/> Ends Policy                          | <input type="checkbox"/> Statutory Committee                            |
| <input type="checkbox"/> Executive Limitations Policy         | <input type="checkbox"/> Ownership Linkage Report                       |
| <input type="checkbox"/> Board-CEO Relationship Policy        | <input type="checkbox"/> <b>Incidental Report</b>                       |
| <input type="checkbox"/> Governance Process                   | <input type="checkbox"/> Registrar & CEO                                |
| <input type="checkbox"/> Board Implementation of Policy       | <input type="checkbox"/> Board Chair                                    |
| <input type="checkbox"/> Board-CEO Relationship Policy        | <input checked="" type="checkbox"/> <b>Other: Governance Specialist</b> |
| <input type="checkbox"/> Governance Process                   |   |

### **PUBLIC INTEREST:**

The CMLTO Artificial Intelligence (AI) Strategy, Governance Framework, and Implementation Plan serve the public interest by ensuring that the College's use of AI is ethical, transparent, and aligned with its statutory mandate to protect the public. Through clear boundaries, oversight mechanisms, and human-in-the-loop safeguards, the Board ensures that AI enhances regulatory effectiveness while maintaining fairness, accountability, and public confidence.

### **BACKGROUND:**

The CMLTO Artificial Intelligence Strategy, AI Governance Framework, Governance Process Policy IV-180: Board Use of Generative Artificial Intelligence, and Executive Limitation Policy EL II-60: Use of Artificial Intelligence together establish a complete and integrated architecture for responsible AI governance at the CMLTO.

Executive Limitation Policy EL II-60: Use of Artificial Intelligence delegates authority to the Registrar & CEO to manage, apply, and oversee AI systems across CMLTO operations in alignment with the Board's Ends Policies, strategic objectives, and ethical and legal obligations. This policy sets the boundaries within which all AI activities must occur—ensuring fairness, privacy, human oversight, transparency,



and responsible innovation consistent with the CMLTO AI Strategy, AI Governance Framework, and AI Implementation Plan.

With this delegated authority, the Registrar & CEO is responsible for leading and implementing the CMLTO Artificial Intelligence (AI) Implementation Plan (2025–2027), ensuring that all AI initiatives are executed in a manner that enhances regulatory effectiveness, strengthens organizational performance, and upholds public trust.

The CMLTO Artificial Intelligence (AI) Implementation Plan (2025–2027) translates the AI Strategy and AI Governance Framework into measurable, phased actions that build the College's capacity for responsible, ethical, and transparent AI adoption.

The Plan establishes a structured approach for implementing and monitoring AI initiatives across governance and operations through:

- Three (3) defined implementation phases — **Governance Readiness and Strategy Implementation, Pilot Implementation and Evaluation, and Scale and Optimization**,
- Development of a comprehensive **AI Policy Suite and Governance Toolkit**,
- Creation of formal **AI Oversight and monitoring mechanisms**, risk-tiered review processes, and change-control protocols,
- Implementation of **training and literacy programs** for the Board, Statutory Committees, and staff, and
- Integration of **annual reporting, auditing, and continuous improvement** cycles to ensure accountability and alignment with public-protection objectives.

In accordance with the Policy Governance Model<sup>©</sup>, the Plan will be implemented under the authority of the Registrar & CEO, within the boundaries of Executive Limitation EL II-60: Use of Artificial Intelligence (AI), and monitored by the Board of Directors through annual reports and compliance reviews.

Together, these measures ensure that AI adoption at the CMLTO strengthens regulatory excellence, enhances organizational performance, and upholds public trust through ethical, human-centered innovation.



Successful implementation of this Plan will result in an organization-wide state of AI governance readiness, with policies, toolkits, and oversight mechanisms in place to support ethical, data-driven decision-making across all CMLTO functions.

This Plan will be updated following the Board's discussion of the CMLTO Artificial Intelligence Strategy and AI Governance Framework. It is being presented to the Board for information at this stage, and is a living document that will be refined as implementation progresses and further revised to reflect emerging regulatory requirements, technological developments, organizational needs, risk findings, and best practices in responsible AI governance.

**APPENDICES:**

**Appendix 1 – CMLTO Artificial Intelligence (AI) Implementation Plan (2025–2027)** *[Uploaded to the CMLTO Board Portal as a stand-alone document]*



## **AGENDA ITEM 6.0**

**6.0**

**ADJOURNMENT**



College of Medical  
Laboratory Technologists  
of Ontario

**THANK YOU FOR YOUR ATTENDANCE**