



College of Medical  
Laboratory Technologists  
of Ontario

# **BOARD MEETING MATERIAL**

Monday, April 13, 2026 / Time: 8:30 AM – 5:00 PM

**AGENDA**  
**CMLTO BOARD OF DIRECTORS MEETING**  
**Hybrid (In-Person / Virtual) Generative / Strategic Thinking Meeting**

CMLTO Boardroom  
25 Adelaide Street East, Suite 2100, Toronto, Ontario  
**Monday, April 13, 2026 / Time: 8:30 a.m. – 4:00 p.m.**  
Chair: K. Persad, Board Chair – CMLTO Board of Directors

Agenda Item	Topic	Proposed Outcome	Lead	Report Type	Page Number	Start Time
<b>1.0</b>	<b>WELCOME, INTRODUCTIONS AND CALL TO ORDER</b>					<b>8:30 am</b>
1.1	Introductions and Roll Call	Board Attendance	K. Persad	N/A	N/A	8:30 am
1.2	Introductions & Welcome to New Public Board Member: • Jeffrey Dorfman	Board Introductions	K. Persad	N/A	N/A	8:32 am
1.3	Land Acknowledgement	Land Acknowledgement	K. Persad	N/A	N/A	8:38 am
<b>2.0</b>	<b>APPROVAL OF MEETING AGENDA</b>					<b>8:40 am</b>
2.1	Review and Approval of Meeting Agenda	Board Approval ( <i>Motion</i> )	K. Persad	N/A	N/A	8:40 am
2.2	Declaration of Conflict of Interest	Declaration of Conflict of Interest	K. Persad	N/A	N/A	8:42 am
<b>3.0</b>	<b>GOVERNANCE PROCESS: CONTINUING LEARNING / BOARD ORIENTATION / POLICY DEVELOPMENT</b>					<b>8:45 am</b>
3.1	CMLTO Governance Modernization Plan Refresh	Board Discussion	J. Tzountzouris / M. Cakar	Read Item 3.1 Presentation at meeting	6	8:45 am
<b>LUNCH</b>						<b>12:00 pm</b>
3.2	CMLTO Board/Careholdership Linkage Plan Refresh	Board Discussion	J. Tzountzouris / M. Cakar / M. Price	Read Item 3.2 Presentation at meeting	12	1:00 pm
<b>BREAK (TIME TO BE DETERMINED DURING SESSION)</b>						
3.3	CMLTO Financial Health: Current and Future State	Board Discussion	J. Tzountzouris	Read Item 3.3	127	3:00 pm
<b>4.0</b>	<b>ADJOURNMENT</b>					<b>4:00 pm</b>



## AGENDA ITEM 1.0

<b>1.0</b>	<b>WELCOME, INTRODUCTIONS AND CALL TO ORDER</b>
1.1	Introductions and Roll Call
1.2	Introductions & Welcome to New Public Board Member: <ul style="list-style-type: none"><li>• Jeffrey Dorfman</li></ul>
1.3	Land Acknowledgement



## **AGENDA ITEM 2.0**

<b>2.0</b>	<b>APPROVAL OF MEETING AGENDA</b>
2.1	Review and Approval of Meeting Agenda
2.2	Declaration of Conflict of Interest <i>(CMLTO Board Member Code of Conduct and Confidentiality Agreement, Conflict of Interest Declaration Forms posted on CMLTO Board Portal as a stand-alone document)</i>



## AGENDA ITEM 3.0

<b>3.0</b>	<b>GOVERNANCE PROCESS: BOARD ORIENTATION / CONTINUING LEARNING / POLICY DEVELOPMENT</b>
3.1	CMLTO Governance Modernization Plan Refresh
3.2	CMLTO Board/Careholdership Linkage Plan Refresh
3.3	CMLTO Financial Health: Current and Future State



## Briefing Report to Board of Directors

**Date** : February 25, 2026

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

**Subject** : CMLTO Governance Modernization Plan Refresh

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| <input type="checkbox"/> Board Policy                   | <input type="checkbox"/> Monitoring Report                              |
| <input type="checkbox"/> Development/Enhancement        | <input type="checkbox"/> Ends   |
| <input type="checkbox"/> Regular Policy Review          | <input type="checkbox"/> Executive Limitations                          |
| <input type="checkbox"/> Policy Approval                | <input type="checkbox"/> Statutory Committee                            |
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| <input type="checkbox"/> Executive Limitations Policy   | <input type="checkbox"/> <b>Incidental Report</b>                       |
| <input type="checkbox"/> Board-CEO Relationship Policy  | <input type="checkbox"/> Registrar & CEO                                |
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| <input type="checkbox"/> Board-CEO Relationship Policy  |   |
| <input type="checkbox"/> Governance Process             |   |

### **PUBLIC INTEREST:**

The CMLTO Governance Modernization Plan 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:**

#### **Approval of Governance Modernization Principles & Regular Updates to Board**

The CMLTO Board of Directors approved the [CMLTO Governance Modernization Principles](#) in September 2022, establishing a framework to strengthen governance effectiveness, regulatory oversight, and public interest accountability. An Operational Plan supporting these principles was presented to the Board as part of the 2023 Registrar and CEO Ends Interpretation, which the Board accepted as reasonable at its February 2023 meeting. Since that time, the Board has received regular quarterly status updates on the Governance Modernization Plan as part of its ongoing oversight responsibilities.

Further information on governance modernization activities has also been provided through the Board's Ends Policy monitoring process and schedule. The Governance Modernization Plan Refresh builds on this established work and provides an opportunity to reflect on progress to date and support informed, forward-looking discussion at the April Generative / Strategic Directions Planning Session.



### Key Developments

As part of its ongoing governance modernization efforts, the Board has advanced several important initiatives since the approval of the **CMLTO Governance Modernization Principles** in September 2022, including:

**1. Governance Modernization Through a Comprehensive By-Law Rewrite:**

The Board approved a new CMLTO By-Law in December 2022 as a foundational governance instrument to strengthen regulatory oversight, clarify governance authorities and accountabilities, and support the Board's ability to fulfill its statutory mandate and public interest responsibilities.

**2. Board Oversight of By-Law Alignment Through a Board Policies Gap Analysis:**

To support effective governance oversight, the Board approved a By-Law Action Items List and undertook a comprehensive Board Policies Gap Analysis to assess alignment between the new By-Law and existing Board policies from a risk-based perspective. This work established a structured approach for achieving full alignment through the Board's regular policy review cycle, with ongoing monitoring and reporting to the Board.

**3. Embedding Public Interest Considerations Through a Public Interest Assessment Framework:**

In furtherance of its statutory duty under the *Regulated Health Professions Act, 1991* to serve and protect the public interest, and consistent with High Level Ends Policy 1 – Public Trust in Health Professions Regulation, the Board has advanced the development of a Public Interest Assessment Framework to support systematic, transparent, and Board-level oversight of how public interest considerations are assessed and reflected in Board and statutory committee decisions.

Updates on both the **CMLTO By-Law – Board Policies Gap Analysis** and the **CMLTO Public Interest Assessment Framework** are provided to the Board on a quarterly basis as part of the Board's ongoing governance oversight and monitoring of the Governance Modernization Plan.

**4. Strengthening Board Effectiveness Through a Board Competency Framework:**

The Board approved the CMLTO Board Competency Framework and Board Competency and Leadership Characteristics Profile, and subsequently endorsed the CMLTO Board Competency Framework Implementation Plan, establishing a competency-based approach to Board composition and development.

**5. Launch of the Implementation of the Global Diversity, Equity, & Inclusion Benchmark (GDEIB) Framework:**

The Board has initiated the implementation of the **GDEIB Framework** to embed equity, diversity, inclusion, and justice (EDI-J) principles across governance and organizational practices. At its May 2025 meeting, the Board committed to using



the Framework as a validated, structured tool to support measurable progress, meaningful reporting, and evidence-based governance decision-making.

**6. Initiation of the Responsible Use of Artificial Intelligence (AI):**

In November 2025, the Board initiated the responsible use of Artificial Intelligence (AI) through the approval of the CMLTO Artificial Intelligence (AI) Strategy, the AI Governance Framework, and the Executive Limitations Policy EL II-60 – Use of Artificial Intelligence. Collectively, these instruments establish the Board’s strategic intent, governance oversight and monitoring expectations, ethical and risk-based guardrails, and clear delegation of authority to the Registrar & CEO, ensuring that the College’s use of AI remains transparent, accountable, and aligned with its statutory mandate to serve and protect the public interest.

**7. Completion of an External Evaluation of Board Effectiveness (2025):**

In 2025, the Board completed an External Evaluation of Board Effectiveness, prepared by **Governance Solutions Inc.**, as part of its governance oversight and continuous improvement responsibilities, to assess Board performance and inform future governance effectiveness.

Collectively, these initiatives demonstrate the significant progress made since the Board approved the CMLTO Governance Modernization Principles in September 2022 and reflect a sustained, multi-year approach to strengthening governance, oversight, and public interest accountability. With this foundation in place, the Board is now positioned to step back and consider how effectively these efforts are advancing the intended governance outcomes and where further focus or refinement may be required.

**Inputs to the April Generative / Strategic Directions Planning Session**

Building on the governance modernization work undertaken to date, the Board reviewed the outcomes and recommendations of the 2025 External Evaluation of Board Effectiveness, prepared by *Governance Solutions Inc.*, along with the Executive Committee’s general feedback, at its meeting on November 21, 2025.

At the same meeting, the Board also reviewed a report summarizing key takeaways from the 2025 *Govern for Impact* Annual Learning & Connecting Conference, including emerging insights, initial considerations for next steps, and potential applications for strengthening the College’s governance practices.

The April Generative / Strategic Directions Planning Session provides an opportunity for the Board to collectively examine these two inputs—the external assessment of Board effectiveness and the governance insights emerging from *Govern for Impact*—and to confirm which elements should inform the **Governance Modernization Plan Refresh**, consistent with the Board’s strategic priorities, governance role, and public interest mandate.

This discussion is intended to inform and confirm the Board’s preferred direction for the Governance Modernization Plan Refresh; detailed implementation decisions will follow through regular Board processes.



To facilitate a structured and comprehensive April discussion, a consolidated Governance Modernization Initiatives Chart (in Appendix 1) has been developed. The inventory is intended to support the Board's strategic deliberation and prioritization by presenting, in one place, the full landscape of governance modernization initiatives for consideration within the context of the Plan Refresh.

### **Governance Modernization Initiatives Chart / Inventory – Board Review Tool**

This chart has been developed to provide the CMLTO Board of Directors with a comprehensive, structured view of governance modernization initiatives that are currently proposed, underway, or completed. Its purpose is to support informed Board discussion, governance deliberation, and prioritization as the Board considers the development of the next Governance Modernization Plan.

#### **What the Chart Includes**

The chart consolidates 34 governance-related initiatives drawn from multiple sources, including:

- External review observations
- Executive Committee recommendations
- Staff-initiated governance improvement proposals
- Board-approved initiatives already in implementation or completed

Each initiative is presented with a consistent set of information to allow for comparability across initiatives, regardless of status.

For each initiative, the following columns are pre-populated to inform Board review:

- Status / Stage (proposed, in progress, or completed)
- Source / Context
- Public Interest Rationale
- Alignment with Board Values and Policy Governance Principles
- Risks & Unintended Consequences – Action
- Risks & Unintended Consequences – Inaction
- Other Considerations  
*(intended to flag material constraints or dependencies, not to assess feasibility or implementation detail)*
- Preliminary Risk Considerations  
*(provided to inform discussion; overall risk level and priority are determined by the Board)*
- Linkages / Alignment Notes, highlighting where initiatives are aligned with, dependent on, overlapping with, or foundational to other initiatives

These brief linkage notes are intended to help the Board see relationships across initiatives, including opportunities for alignment, sequencing, or bundling. Colour-coding is used to group initiatives by broad governance theme, allowing the Board to quickly identify related areas of work while still considering each initiative on its own merits.



### **How the Board Is Asked to Use the Chart**

Board Members are invited to review each initiative holistically, considering:

- Governance value and public-interest relevance
- Alignment with Policy Governance principles
- Risks of action versus inaction
- Relationship to other initiatives

During the April session, the Board will be asked to complete the following columns:

- Board-Determined Risk Profile (Impact × Urgency)
- Relative Priority
- Implementation Horizon (Indicative)
- Board Comments / Observations

These columns are intentionally reserved for Board deliberation.

### **What Is Expected in the April Discussion**

The April Generative / Strategic Directions Planning Session will focus on:

- Identifying which initiatives should be advanced, prioritized, combined, or deferred
- Distinguishing foundational work already underway from new areas of focus
- Confirming alignment with the Board's Ends (Critical Outcomes) and governance role
- Ensuring scope and phasing are proportionate to the College's regulatory context

The intended outcome of the session is clarity and confirmation of the overall direction and scope of the refreshed Governance Modernization Plan, with detailed implementation decisions to follow through regular Board processes.

### **Governance Perspective and Considerations**

From a governance perspective, this refresh represents an opportunity to assess whether the collective modernization efforts since 2022 are coherently advancing the Board's intended governance outcomes and fulfilling its public interest obligations.

Given the scope of modernization efforts now underway, the Board's consideration should focus on how these initiatives function collectively as a governance framework, rather than individually as separate projects.

Potential governance considerations include:

- Risk of initiative fragmentation
- Misalignment between governance intent and implementation
- Unintended impacts on Board capacity or role clarity
- Operational drift beyond the Board's governance role
- Sustainability and sequencing of modernization efforts



### Questions for Board Reflection and Alignment

To support generative discussion and confirm alignment, the Board may wish to consider the following questions during the April session:

1. What must be in place, from an Ends and oversight perspective, to ensure the ongoing protection and advancement of the public interest as the Governance Modernization Plan is refreshed and implemented?
2. Do the initiatives proposed for inclusion in the Governance Modernization Plan Refresh appropriately reflect the Board's current governance priorities and support the Board's Ends (Critical Outcomes) and understanding of its governance role?
3. Are there governance risks, gaps, or unintended consequences that the Board believes should be more explicitly addressed to ensure effective oversight and accountability?
4. Is the scope and sequencing of the proposed modernization initiatives proportionate to the College's regulatory context and aligned with the Board's role, capacity, and oversight responsibilities?
5. Are there additional areas of governance practice or oversight that the Board believes warrant further exploration or inclusion as part of the Governance Modernization Plan Refresh?

### Intended Outcome of the April Generative / Strategic Directions Planning Session

The April Generative / Strategic Directions Planning Session is intended to support informed, forward-looking dialogue and may culminate in the Board confirming or approving the overall direction and scope of the Governance Modernization Plan Refresh.

### APPENDICES:

- Appendix 1 - CMLTO Governance Modernization Initiatives Chart**  
*(Uploaded to the CMLTO Board Portal as a stand-alone document)*



## Briefing Report to Board of Directors

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**Date** : March 16, 2026

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

**Subject** : CMLTO Board/Careholdership Linkage Plan Refresh

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

Board–Careholdership Linkage is a core governance function that serves the public interest by ensuring that the Board’s authority, decision-making, and policy direction are grounded in an informed understanding of the values, expectations, and long-term interests of the public on whose behalf CMLTO exists.

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### **BACKGROUND**

At its meeting in February 2026, the CMLTO Board of Directors received a briefing regarding the evolution of CMLTO’s Board / Careholdership Linkage work and the development of the ongoing linkage. That briefing outlined how the Board has progressively strengthened its linkage practices since 2022 through learning sessions, structured engagement with careholder groups, and the development of a multi-year linkage approach designed to inform Ends (Critical Outcomes) Policies and governance deliberation.

The February briefing also noted that, as linkage practices mature, boards operating under the Policy Governance® Model periodically revisit the underlying concept of ownership or careholdership to ensure that governance authority, accountability, and linkage activities remain aligned.



The April Generative / Strategic Directions Planning Session therefore builds on that earlier discussion. While the February briefing focused on the practice of linkage, the present briefing focuses on the conceptual foundations of ownership or careholdership that underpin those linkage activities.

Clarifying this concept supports informed Board discussion regarding:

- Who constitutes the CMLTO's ownership / careholdership,
- How linkage activities should be designed to hear those voices, and
- How the Board interprets its accountability within the public-interest regulatory framework.

## PURPOSE

This briefing provides a governance refresher on ownership and careholdership within the Policy Governance® Model to support the Board's upcoming strategic discussion on Board–Careholdership Linkage.

The Board is currently engaged in governance modernization work and in strengthening public-interest accountability. Within this context, a clear understanding of the Policy Governance® concept of ownership / careholdership provides an important lens for Board deliberation regarding linkage, Ends (Critical Outcomes) Policy development, and the Board's accountability to those on whose behalf the organization exists.

In the Policy Governance® Model, ownership is a precise governance concept. It defines the source of Board authority, shapes the development of Ends Critical Outcomes) Policies, and anchors the Board's accountability relationship. A shared understanding of this concept supports disciplined and generative governance deliberation.

This briefing and the accompanying orientation session are therefore intended as a **governance lens refresher**. They do not propose a new definition of ownership / careholdership, advance a recommendation, or pre-determine the outcome of the Board's discussion. Rather, their purpose is to ensure that Board Members begin the discussion using a shared understanding of the Policy Governance® concepts and language relevant to ownership and careholdership.

## BOARD ORIENTATION ON OWNERSHIP / CAREHOLDERSHIP

A document titled "**CMLTO Policy Governance® Orientation Guide V-1 / Ownership / Careholdership in Policy Governance® Model**" (Appendix 1) has been prepared for Board members outlining the foundational principles of Policy Governance®,



including legitimacy, ownership, board authority, and the distinction between owners and stakeholders.

An orientation session will be held during the April meeting to walk the Board through the key concepts presented in the document, clarify the relevant legislative context within which the College operates, and outline the governance implications associated with different potential ownership (careholdership) definitions.

Following this orientation, the Board will be invited to engage in a structured discussion to reflect on how the concept of ownership or careholdership should guide the Board's linkage approach. The identification of ownership / careholdership is a governance determination that rests with the Board.

## **SESSION STRUCTURE**

### **Step 1 – Governance Orientation**

The orientation session will:

- Briefly review the core Policy Governance® concepts presented in the guidance document
- Clarify the legislative and public-interest context within which the College operates
- Explore the governance implications of different ownership / careholdership interpretations

This step is intended to support a shared conceptual foundation before the Board engages in a generative discussion.

### **Step 2 – Board Discussion on Ownership / Careholdership Linkage**

Following the orientation, the Board will be provided with brief background information regarding the CMLTO 2024 and 2025 Ongoing Perpetual Board / Careholdership Linkage / Engagement Plan and key developments.

### **Step 3 – Board Guidance on Future Board Linkage**

The Board will then be invited to provide guidance on future linkage activities, including:

- Which ownership / careholder groups the Board may wish to engage, and
- What types of information the Board would like to gather from those groups to inform Ends Critical Outcomes) Policy development and governance direction.



Supporting materials relevant to the Board's discussion are provided in the appendices below.

### **INTENDED OUTCOME**

The Board will review the conceptual foundations of ownership / careholdership and provide guidance regarding how the CMLTO should define and engage its ownership / careholdership in future Board–careholdership linkage activities.

### **APPENDICES:**

**Appendix 1** – CMLTO Policy Governance® Orientation Guide V-1

**(CONFIDENTIAL)** Ownership / Careholdership in Policy Governance® Model

**Appendix 2** – The CMLTO 2024 and 2025 Ongoing Perpetual Board / Careholdership Linkage / Engagement Plan

**Appendix 3** – Fulsome Engagement Results

**Appendix 4** – Key Developments of Ongoing CMLTO Board of Directors Linkage Initiatives

**Appendix 5** – February 2026 Briefing Report: Planning for April Board Generative / Strategic Directions Planning Session



## Briefing Report to Board of Directors

**Date** : August 19, 2024

**From** : Karen Fryday-Field, Senior Governance and Strategy Consultant, Meridian Edge Leadership & Governance Consulting in consultation with John Tzountzouris, Registrar & CEO and Maggie Cakar, Governance Specialist

**Subject** : The CMLTO 2024 and 2025 Ongoing Perpetual Board/Careholdership Linkage/Engagement Plan

### Report Purpose:

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

### Recommended Motion:

Be it resolved that

The Board moves to approve (1) The updated CMLTO Board Ongoing Perpetual Linkage Plan for 2024 and 2025 and (2) The CMLTO Board Ongoing Perpetual Linkage Plan for 2024 and 2025 Timelines as presented in Appendix 1.

### BACKGROUND

The CMLTO Board of Directors has been working through 2024 to both further explore related concepts and to build a perpetual, ongoing Board/Careholdership Linkage Plan. At its May Board meeting, the Board further developed perspectives on approaches to:

- Engage the perspectives and voices of members of the public who have a legitimate and direct interest in the CMLTO,
- More formally engage a more diverse set of participants and invites co-development of the agenda,



- Focus the engagement on key governance functions as well as the manner in which College registrants and members of the public experience the results of CMLTO's services,
- Allow the focus of the discussion to better and more continuously inform Board future-thinking on its policy direction,
- Simplify the connections where possible through Board use of some regular, ongoing tools designed to share and collect information.

A Board's dedication to this important linkage duty represents approximately 30% of the Board's work. Dedication is critical and requires Board and staff discipline. It also yields important new insights and confirms where CMLTO direction is aligned with Careholdership values.

The Plan that is attached includes:

- A Background Section on Linkage Concepts, ensuring that the Plan can stand alone and be comprehensible to future readers
- An introduction outlining the content of the plan,
- The plan itself with:
  - the groups to be connected with,
  - the specific areas of focus for dialogue/feedback based on the nature of the group and regardless of the communication mechanism,
  - an invitation to the participants to raise other related matters that are important to them in the context of the role of CMLTO and its impact,
  - the timing and mechanism for connecting,
- Appendix 1 – Summary of the Linkage Processes and Timing
- Appendix 2 – Summary of the Overall Themes for Seeking Insights by the Board from the Careholdership for Use in Informing Board Policy.

At the May 2024 Board meeting, the Board passed a motion approving in principle the CMLTO Board/Careholdership Linkage Plan for 2024 and 2025.

This package is to confirm for the Board that the ideas and recommendations regarding the plan have now been fully included. The plan is ready to move to the implementation stage.



# THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

## BACKGROUND

The College of Medical Laboratory Technology of Ontario (CMLTO) Board of Directors established as one of its significant goals in 2022 and 2023 to further explore and understand the purposes, concepts, and processes for the Board/Careholdership Linkage. Further, in late 2022 and through the first half of 2023, the Board designed and engaged in a deep dive set of linkage processes with representative groups of the CMLTO Careholdership.

By “Careholdership”, the Board is referring to all Ontarians who would be impacted by the College’s ability to achieve its purpose ethically, prudently, and equitably, over the long-term or for as long as this purpose is needed.

The Board defines “Careholders” to specifically refer to all key groups that it wishes to connect with as part of this plan, including: members of the Ontario public (including those who have potentially faced barriers to accessing medical laboratory services), Medical Laboratory Technologists registered with the College, Voluntary Roster affiliates, and recent applicants to the College.

CMLTO is in the process of seeking out methods for more accurately defining the Careholders who have experienced barriers in receiving laboratory services, including: female registrants, First Nations community members on reserve in the Far North with limited access to doctors/diagnoses/test facilities, recent immigrants who are transitioning into Ontario’s health care systems, people whose second language is English, people with disabilities whose mobility or comprehension creates barriers to accessing services. The CMLTO is committed to advancing organizational behaviours to support them more effectively and in the public interest and to ensure that the lessons learned from commitment to this plan will support a more diverse Careholder population.

It is important to note that this briefing report represents the policy approach, but the implementation has been updated to be more specific with regards to listening, learning, and mitigating risk. The overall goal is to enhance the quality of the services we deliver to all Careholder groups.

The CMLTO Board of Directors has outlined its values regarding Board linkage with the Careholdership in its Governance Process Policy GP IV-45 Board Linkage With Ownership/Careholdership.

In late 2022 and through 2023, the Board engaged in a series of deep consultations with groups of the Careholdership. The groups that the Board engaged, during that cycle of engagement, included:



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

- The Public of Ontario (through the Community Advisory Group [CAG]),
- Employers,
- CMLTO MLT Registrants,
- Medical Laboratory Assistants or Technicians included on the CMLTO Voluntary Roster,
- Recent Applicants to CMLTO (with their Careholdership hat on as members of the public with unique insight).

The deep learning and insights from those 2022 and 2023 Careholdership linkage connections were used by the Board to inform the development of its 2024 to 2026/2027 Ends (Critical Outcomes) Policies, i.e., the CMLTO strategic direction. The Registrar & CEO has interpreted that Board direction through its refreshed Ends (Critical Outcomes) Policies and has created operational outcomes, targets, measures, and related rationale for 2024 and beyond. A Strategic Framework has also been created to support the achievement of these Ends (Critical Outcomes) Policies.



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

A very important commitment by the Board is to link with the Careholdership at a governance level and not an operational level. In other words, the Board's goal is to discuss systemic, high-level matters with the Careholdership in regard to what is in the best interest of creating a high level of impact. It seeks to learn about Careholder values on systems that affect all beneficiaries and not individual beneficiary of consumer interests.

The CMLTO Board of Directors has now developed its 2024 and 2025 Ongoing Perpetual CMLTO Board/Careholdership Linkage Plan. In the design and formation of this plan, the Board is committed to both ongoing Board connections with the Careholdership and to reach a broader, more diverse group of Ontarians. The Board has added two new groups for consultation and is developing mechanisms to reach voices and perspectives of people who have not necessarily been engaged before. This is evident in the plan summarized below.

The purposes of Board/Careholdership Linkage are primarily three-fold including:

- 1) To provide education and context ensuring that the Careholdership has an informed understanding of CMLTO's purpose and scope including an overview of some of the current regulatory strategic, systemic matters. The generous sharing of the experiences and perspectives of Careholders enables the CMLTO to integrate critical and important feedback that it will strive to adopt into meaningful systems change with the overall goal of enhancing the services and relationships with Careholder groups.
- 2) To seek input from the Careholdership on their perspectives and values on "what impact CMLTO should have in Ontario in terms of public interest protection" and on values and perspectives they may hold on CMLTO's "ethics, equity, and prudence"—this helps to inform a broader Board discussion regarding the formulation of its End (Critical Outcomes) and other Board policy direction.
- 3) To be accountable to the Careholdership, the broader Ontario public, to share CMLTO's achievements and impacts demonstrating CMLTO is accomplishing its purpose and to further demonstrate that CMLTO accomplishes these outcomes through well-governed, equitable, ethical, and prudent strategies as well as operations and methods used.

A very important commitment by the Board is to link with the Careholdership at a governance level and not an operational level. In other words, the Board's goal is to discuss systemic, high-level matters with the Careholdership in regard to what is in the best interest of creating impact with beneficiaries.

The Board is, of course, very committed to beneficiary (i.e. customer) perspectives on service quality and individual needs. The Board/Careholdership engagement plan is not the forum to address individual beneficiary (or customer) service quality. The customer perspective is delegated



## **THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)**

to and addressed separately by the Registrar & CEO and reported to the Board both through Ends (Critical Outcomes) results and Executive Limitations Monitoring Reports.

The CMLTO Board is very committed to listening, learning, and committing to change processes, if necessary, to benefit equity seeking Careholders. This level of input is essential for governing with relevant insight and for mitigating risks involved with being out of touch with Careholder groups. Thus, in the strategic cycle years between major updates on the Ends (Critical Outcomes) strategic reviews, the Board is committed to engage in regular, ongoing or perpetual linkage/engagement activities to continue to inform its insight and wisdom. The Board plans to share the agenda setting of these engagement sessions by both setting some agenda topics to cover and by inviting participants to raise related key questions and ideas that they believe are important in this context.



# THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

## THE 2024 AND 2025 BOARD/CAREHOLDERSHIP LINKAGE PLAN

### INTRODUCTION TO THE PERPETUAL BOARD CAREHOLDERSHIP LINKAGE PLAN

The 2024 and 2025 Board/Careholdership Perpetual Linkage Plan is designed to achieve the goals of Careholdership engagement listed above in the Background Section. The plan is designed to:

- First address the Careholders and subgroups being engaged,
- Include key educational/accountability messages to be shared specifically by the Board,
- Include key insight information designed for consultation and input from the set of Careholders being engaged, and
- Include the method of and timing for engagement for the Careholder group being engaged (which has been assessed by the Registrar & CEO for CMLTO capacity in terms of the CMLTO strategic operating plan for 2024 and 2025).

In Appendix 1 of the plan, a chart is provided to demonstrate the various engagements and related timing for all of this perpetual Board linkage. Given that some new engagement processes and connections are being developed, the timing of this plan may vary somewhat based on the learning along the implementation journey.



# THE CMLTO BOARD’S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

Linkage Groups/Sub-Groups	
<p><b><u>THE PUBLIC</u></b>  <b>Public-Broader Social Media and Public-Community Advisory Group</b></p>	
Topics to Share Out About CMLTO (sharing education and building accountability from the Board)	Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)
<ul style="list-style-type: none"> <li>• CMLTO’s purpose and regulatory mandate</li> <li>• CMLTO’s recent Ends (Critical Outcomes) Policies results and key achievements</li> <li>• CMLTO’s values – update on EDIJ progress</li> </ul>	<ul style="list-style-type: none"> <li>• [Open ended question format] You are welcome but not required to provide a few sentences below about how you self-identify. Answers can include the broader community that you are a part of. Please note that the CMLTO will be using this information for informative purposes only. If you have identified barriers to your access to medical laboratory services, you will be subsequently contacted to provide further information to CMLTO staff as a means of improving the level of service provided by the College.</li> <li>• Are people in your community experiencing easy, ready access to medical laboratory services?             <ul style="list-style-type: none"> <li>○ Track access by different regions across Ontario.</li> <li>○ Are there any barriers that impact your access to medical laboratory services in your area? If there are, please identify the barriers (open ended response).</li> </ul> </li> <li>• Do you feel like you have access to medical laboratory professionals in your area?             <ul style="list-style-type: none"> <li>○ If so, do you have trust in the laboratory professionals serving in the labs?</li> </ul> </li> <li>• Do you feel that your community is represented in the overall purpose and role of the CMLTO?</li> <li>• CMLTO’s role is to protect the “public interest” by:</li> <li>• Regulating Ontario’s medical laboratory technologists (MLTs)</li> </ul>



## THE CMLTO BOARD’S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

	<ul style="list-style-type: none"> <li>• Acting as the governing body for MLTs in Ontario</li> <li>• Setting the standards for entry to practice to the MLT profession</li> <li>• Investigating complaints about MLTs’ professional conduct.             <ul style="list-style-type: none"> <li>○ Does the above information align with your understanding of CMLTO’s role with relation to the public interest?</li> <li>○ Explain your personal understanding of what the “Public Interest” is (open ended)</li> </ul> </li> <li>• CMLTO’s role is to protect the “public interest” as it relates to the safety and quality of the practice of medical laboratory professionals. What do you understand the “public interest” to mean? What do you understand “protection of the public interest” in this context to mean?</li> </ul> <p>Do you believe that all the medical laboratory professionals working in medical labs in Ontario should have some form of regulatory oversight? i.e., protection for the public by having a regulatory organization overseeing their practice. Why or why not?</p>
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<b>MECHANISMS AND TIMING</b>		
<b>Q2 - May 2024 and 2025</b>	<b>Q4 – 2024 to Q4 2025</b>	<b>Q2 – 2025</b>
<ul style="list-style-type: none"> <li>• Informational messages – Annual Report</li> </ul>	<ul style="list-style-type: none"> <li>• Launch brief public questionnaire to run for year – seeking above</li> </ul>	<ul style="list-style-type: none"> <li>• Community Advisory Group – questionnaire</li> </ul>
		<b>Q2 to Q4-2025</b>



## THE CMLTO BOARD’S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<ul style="list-style-type: none"> <li>• Board Informational/Education messages on website (quarterly updates)</li> </ul>	<p>input/feedback/info – data analysis semi-annually</p> <ul style="list-style-type: none"> <li>• Promoted through social media</li> <li>• Each topic to have an introductory paragraph explaining the context for the question – using simple, non-clinical, accessible language</li> </ul>	<ul style="list-style-type: none"> <li>• In consultation with the CAG, develop an approach to engage equity-deserving community members who identified that they had experienced barriers in accessing medical laboratory services in the past. Focus engagement on identifying the specific barriers that these groups have faced when trying to access medical laboratory services.</li> <li>• Collaborate with the CAG in order to set up a questionnaire for with these individuals as a means of identifying barriers to access and understanding which groups have experienced marginalization as a result of not accessing these services.</li> <li>•</li> </ul>
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## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b>MLT REGISTRANTS</b>	
Topics to Share Out About CMLTO (sharing education and building accountability from the Board)	Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)
<ul style="list-style-type: none"> <li>• CMLTO’s purpose and regulatory mandate</li> <li>• CMLTO’s recent Ends (Critical Outcomes) Policies results and key achievements</li> <li>• CMLTO’s values – update on EDIJ progress</li> <li>• Key systems issues CMLTO is addressing in regulation</li> <li>• CMLTO’s rostering program and MLA/T oversight agenda in the interest of public protection</li> </ul> <p><i>Note: The Board discussed incentivising participation indicating participation can be considered as a continuing education element as it is a professional learning experience.</i></p>	<ul style="list-style-type: none"> <li>• Do you believe that all medical laboratory technicians/assistants should be under oversight by a regulator? If yes, why is this important from your perspective?</li> <li>• What is your perspective of the effect on the health system safety and quality with the use of both speciality and general MLTs?</li> <li>• Have you experienced any barriers because of who you are (your race, gender, sexuality, ability) when interacting with the CMLTO? What were they? How would you suggest CMLTO change its approach to address any concerns you have as they relate to equity, diversity, inclusion and justice? Please consult the following definition of CMLTO’s role in protecting the public interest prior to answering the question below: <b>The College of Medical Laboratory Technologists of Ontario (CMLTO) is the regulatory body for medical laboratory technologists (MLTs) in Ontario. The CMLTO exists to ensure the public receives quality laboratory services from competent and ethical professionals.</b></li> <li>• <b>They key role that the CMLTO plays in protecting the public interest involves:</b> <ul style="list-style-type: none"> <li>○ Regulating Ontario’s medical laboratory technologists (MLT)</li> <li>○ Acting as the governing body for MLTs in Ontario</li> <li>○ Setting the standards for entry to practice to the MLT profession</li> </ul> </li> </ul>



## THE CMLTO BOARD’S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b><u>MLT REGISTRANTS</u></b>		
Topics to Share Out About CMLTO (sharing education and building accountability from the Board)	Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)	
	<ul style="list-style-type: none"> <li>○ Investigating complaints about MLTs’ professional conduct.</li> <li>● Do you think that CMLTO is operating in the public interest? Please explain. What do you understand “protection of the public to mean”? What can CMLTO do better to protect the public? What is your perspective on CMLTO’s progress in ensuring the protection of the public?</li> </ul>	
<b>MECHANISMS AND TIMING</b>		
<b>Q4-Dec 2024 and Q2 - May 2025</b>	<b>Q3 - 2025</b>	<b>Q2 - 2025</b>
<ul style="list-style-type: none"> <li>● Informational messages about CMLTO as outlined above in CMLTO Focus Newsletter</li> <li>● Annual Report including on website for registrants – May 2025</li> </ul>	<ul style="list-style-type: none"> <li>● Virtual focus groups (e.g. 3 x 10-15 participants) (First virtual focus group will be designed as a pilot to assess the relevance and impact of the discussion topics)</li> </ul>	<ul style="list-style-type: none"> <li>● Specific newsletter articles on topics to seek systemic input from all MLT registrants</li> </ul>



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b><u>MLA/T Voluntary Roster Affiliates and Non-Rostered MLA/Ts</u></b>	
<i>Note: Connect with both rostered and non-rostered MLA/Ts.</i>	
<b>Topics to Share Out About CMLTO (sharing education and building accountability from the Board)</b>	<b>Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)</b>
<ul style="list-style-type: none"> <li>• CMLTO’s purpose and regulatory mandate</li> <li>• CMLTO’s recent Ends (Critical Outcomes) Policies results and key achievements</li> <li>• CMLTO’s values – update on EDIJ progress</li> <li>• Key systems issues CMLTO is addressing in regulation</li> <li>• CMLTO’s rostering program and MLA/T oversight agenda in the interest of public protection</li> </ul>	<p><u>Questions for Rostered MLA/Ts</u></p> <ul style="list-style-type: none"> <li>• The role of CMLTO is Do you believe that all medical laboratory technicians/assistants should be under oversight by a regulator?               <ul style="list-style-type: none"> <li>○ If yes, why is this important?</li> <li>○ In no, why not?</li> </ul> </li> <li>• CMLTO’s role is protection of the public interest related to the safety and quality of MLT professional practice. In this context, what do you understand “public interest” to mean? What do you understand “protection of the public” to mean?</li> <li>• How do you perceive equity, diversity, inclusion, and justice in CMLTO’s practices?</li> <li>• Do you, as a Medical Laboratory Assistant or Technician, believe that CMLTO is focused on the right results and is achieving those results within its mandate?</li> <li>• Provide background on where and how MLA/Ts could become more engaged with CMLTO (e.g., admin committee or task force work). If opportunities exist, would you be interested in serving as a volunteer in CMLTO’s work? Yes, No, Maybe</li> </ul>



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b><u>MLA/T Voluntary Roster Affiliates and Non-Rostered MLA/Ts</u></b>	
<i>Note: Connect with both rostered and non-rostered MLA/Ts.</i>	
Topics to Share Out About CMLTO (sharing education and building accountability from the Board)	Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)
	<p><u>Questions for Non-Rostered MLA/Ts</u></p> <ul style="list-style-type: none"> <li>• Are you familiar with the CMLTO mandate to protect the public interest related to safe, quality health care in medical laboratory practice? Please describe your understanding.</li> <li>• Do you believe that all medical laboratory technicians/assistants should be under oversight by a regulator? If yes, why is that important? If no, why not?</li> <li>• What do you understand “public interest” to mean?</li> <li>• What do you understand “protection of the public” to mean in the context of medical laboratory practitioner practice?</li> <li>• How do you perceive equity, diversity, inclusion, and justice in CMLTO’s practices?</li> <li>• Do you believe, as a medical laboratory assistant or technician, that CMLTO is focused on the right results and is achieving these results?</li> <li>• If you are a non-rostered MLA/T, what holds you back from joining this important initiative?</li> </ul>
<b>MECHANISMS AND TIMING</b>	
<b>Q2 - May 2024 and 2025</b>	<b>Q2 – 2025 - Virtual Focus Group (1 Rostered, 1 Non-Rostered)</b>
<p><u>Registered MLA/Ts</u></p> <ul style="list-style-type: none"> <li>• Educational and accountability messages from CMLTO Board -Annual Report including on website (Q2-May 2024 and 2025)</li> </ul>	<ul style="list-style-type: none"> <li>• These are new sub-groups for direct Board interaction</li> <li>• Seek out and collaborate with professional organizations to explore using their newsletter and continuing education channels to engage M/LATs in this process</li> </ul>



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b><u>MLA/T Voluntary Roster Affiliates and Non-Rostered MLA/Ts</u></b>	
<i>Note: Connect with both rostered and non-rostered MLA/Ts.</i>	
Topics to Share Out About CMLTO (sharing education and building accountability from the Board)	Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)
<p><u>Non-Rostered MLA/Ts</u></p> <ul style="list-style-type: none"> <li>Explore feasibility communication through professional association newsletters</li> </ul>	<ul style="list-style-type: none"> <li>Conduct two focus group of 8-10 people (Rostered MLA/Ts and Non-Rostered MLA/Ts) each from areas across different MLA/T roles and practice areas</li> </ul>



## THE CMLTO BOARD’S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b>Employers</b>	
Topics to Share Out About CMLTO (sharing education and building accountability from the Board)	Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)
<ul style="list-style-type: none"> <li>• CMLTO’s purpose and regulatory mandate</li> <li>• CMLTO’s recent Ends (Critical Outcomes) Policies results and key achievements</li> <li>• CMLTO’s values – update on EDIJ progress</li> <li>• CMLTO’s role in health human resources planning</li> <li>• How regulation and oversight work to ensure qualified, competent practitioners and public safety and quality</li> <li>• Why MLA/T oversight is key to the protection of public interest                             <ul style="list-style-type: none"> <li>○ Including why it is important for employers to engage in and support oversight and rostering of MLAT’s (what is in it for the employer’s interest?)</li> </ul> </li> <li>• Education on “Mandatory Reporting” by employers to CMLTO</li> </ul>	<ul style="list-style-type: none"> <li>• What are employer perspectives on the protection of the public interest and on health human resources with the use of speciality and general MLTs?                             <ul style="list-style-type: none"> <li>○ What, if any, barriers are employers having in recruiting and hiring MLTs and MLA/Ts?</li> </ul> </li> <li>• What do employers believe would assist with public safety in regard to MLA/T practice and current lack of mandatory regulatory oversight?                             <ul style="list-style-type: none"> <li>○ Do employers support and use in their hiring process MLA/T rostered practitioners, i.e. rostering required or recommended as a qualification?</li> </ul> </li> <li>• Who best, in the various types of employer organizations (e.g. hospital, clinic, community labs, etc.), should CMLTO be reaching out to establish relationships with?</li> <li>• What do employers see as the greatest risk to public safety in the medical laboratory services space?</li> <li>• When employers require information on health human resources, registrant status, and/or reporting on a concern or complaint related to a MLT or M/LAT, do they know how to connect with CMLTO and do they find CMLTO responsive?</li> </ul>
<b>MECHANISMS AND TIMING</b>	



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b>Q2 - May 2024 and 2025</b>	<b>Q3 – 2024 and Q3 – 2025 at a minimum</b>	<b>Q3 - 2025</b>
<ul style="list-style-type: none"> <li>• Education and accountability messages in Annual Report including on website</li> </ul>	<ul style="list-style-type: none"> <li>• Employer newsletter article directed at Board linkage (background and questions) on some of the accountability to the Board and education topics above</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group with a range of types of employers directed at Board linkage (as per topics designed above) with Board Members leading the discussion</li> </ul>



## THE CMLTO BOARD’S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

<b>RECENT MLT APPLICANTS</b>		
<b>Topics to Share Out About CMLTO (sharing education and building accountability from the Board)</b>	<b>Topics to Seek Systemic Input Regarding CMLTO (Determined by the Board)</b>	
<ul style="list-style-type: none"> <li>CMLTO’s purpose and regulatory mandate</li> <li>CMLTO’s recent Ends (Critical Outcomes) Policies results and key achievements</li> <li>CMLTO’s values – update on EDIJ progress</li> <li>Key systems issues CMLTO is addressing in regulation</li> </ul>	<ul style="list-style-type: none"> <li>Do you believe that all medical laboratory technicians/assistants should be under oversight by a regulator? If yes, why is this important?</li> <li>What is your perspective of the effect on the system safety and quality with the use of speciality and general MLTs?</li> <li>How do you perceive equity, diversity, inclusion, and justice in CMLTO’s practices?</li> <li>What do you understand “public interest” to mean? What do you understand “protection of the public interest” to mean?</li> <li>Do you believe CMLTO is a fair, transparent, objective organization for new MLT applicants to work with?</li> </ul>	
<b>MECHANISMS AND TIMING</b>		
<b>Q2 - May 2024 and 2025</b>	<b>Q2 – 2025</b>	<b>Q2 - 2025</b>
<ul style="list-style-type: none"> <li>Education and accountability messages – Annual Report including on website</li> </ul>	<ul style="list-style-type: none"> <li>Virtual focus groups (e.g. 2 x 8-10 participants)</li> </ul>	<ul style="list-style-type: none"> <li>Specific newsletter articles seeking input on the questionnaire described above</li> </ul>

*Note: Presentation for MLT students at some or all educator locations was discussed with a purpose of educating students on CMLTO (i.e. helping students understand the role and value of CMLTO as a regulator). This is a staff role and is a regular function and process at CMLTO. The Board’s role is to seek systemic feedback of the recent MLT Applicants on systems issues.*



## THE CMLTO BOARD'S ONGOING PERPETUAL LINKAGE PLAN – 2024 and 2025 (approved at May 2024 Board Meeting)

### APPENDICES:

**Appendix 1** – Key Linkage Activities by Group by Timing

**Appendix 2** – A Summary of the Overall Themes Developed by the CMLTO Board Across the Full Linkage/Engagement Processes. Not all questions will apply to all consultations.

	2024												2025											
	Q2			Q3			Q4			Q1			Q2			Q3			Q4					
	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC				
<b>THE PUBLIC</b>	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
Informational messages – Annual Report																								
Board Informational/Education messages on website (quarterly updates)																								
Launch brief public questionnaire to run for year – seeking above input/feedback/info – data analysis semi-annually Promoted through social media																								
Community Advisory Group – focus group or questionnaire																								
Three focus group sessions with those who may have been marginalized in this process in the past																								
<b>MLT REGISTRANTS</b>	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
Informational messages about CMLTO as outlined above in CMLTO Focus Newsletter																								
Annual Report including on website for registrants																								
Virtual focus groups (e.g. 3 x 10-15 participants)																								
Specific newsletter articles on topics to seek systemic input from all MLT registrants																								
<b>MLA/T VOLUNTARY ROSTER AFFILIATES AND NON-ROSTERED MLA/Ts</b>	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
<b>Registered MLA/Ts</b> Educational and accountability messages from CMLTO Board -Annual Report including on website (Q2-May 2024 and 2025)																								
<b>Non-Rostered MLA/Ts</b> Explore feasibility communication through professional association newsletters																								
<ul style="list-style-type: none"> <li>•These are new sub-groups for direct Board interaction</li> <li>•Seek out and collaborate with professional organizations to explore using their newsletter and continuing education channels to engage M/LATs in this process</li> <li>•Conduct two focus group of 8-10 people (Rostered MLA/Ts and Non-Rostered MLA/Ts) each from areas across different MLA/T roles and practice areas</li> </ul>																								
<b>EMPLOYERS</b>	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
Informational messages – Annual Report including on website																								
Employer newsletter article directed at Board linkage (background and questions)																								
Focus group with a range of types of employers directed at Board linkage																								
<b>RECENT MLT APPLICANTS</b>	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/		
Informational messages – Annual Report including on website																								
Virtual focus groups (e.g. 2 x 8-10 participants)																								
Specific newsletter articles seeking input																								

## **SUMMARY OF OVERALL THEMES FOR ONGOING PERPETUAL BOARD/CAREHOLDERSHIP LINKAGE – 2024 AND 2025**

### **2024 and 2025 Themes for Seeking Insights by the Board from the Careholdership for Use in Informing Board Policy Decision-Making**

- 1) Understanding views on what the “public interest” and “protection of the public interest” is perceived to be in the context of regulating medical laboratory professionals.
- 2) How do you perceive equity, diversity, inclusivity, and justice in CMLTO’s practices?
- 3) What outcomes or results do the Careholdership/ownership expect from CMLTO in terms of health human resources?
- 4) What outcomes do the Careholdership expect CMLTO to be achieving on behalf of the public?
- 5) Do the Careholdership believe they have equitable access to safe, trusted, medical laboratory services (across the province/regional differences)?
- 6) What is the public interest impact through utilizing registered “specialty” and “general” MLTs?
- 7) Do the Careholdership believe that all medical laboratory professionals should be regulated (i.e. including Medical Laboratory Technicians and Assistants)? Why? How does this impact the public interest?

#### *Notes:*

- 1) *It is important to recognize the focus of this linkage is to explore systemic input on the results CMLTO should, and is achieving, along with insight on CMLTO values. This is not the forum to assess the service quality of CMLTO.*
- 2) *The topics for linkage above have been modified as needed in order to connect with specific groups within the Careholderships. Not all questions are relevant to all groups.*
- 3) *All groups will be asked if they have items they wish to raise beyond the specific planned, scripted questions to enable participants to also shape the dialogue.*



## Fulsome Engagement Results

### Public:

#### 2025 Public Questionnaire

The public linkage survey will be shared on an ongoing basis, but the following results are based on survey results from February – May 2025:

#### 1. General Awareness and Trust in Laboratory Services

- **High trust in lab professionals:** Over 92% of respondents stated they trust medical laboratory professionals in their area.
- **Perceived access is strong:** 91% felt they had access to medical laboratory services in their community, although a small portion reported barriers (e.g., travel, long wait times, limited availability).

#### 2. Understanding of CMLTO's Role

- **Alignment with public perception:** 100% of respondents indicated that the provided description of CMLTO's role aligned with their understanding.
- **Public interest recognized:** Respondents largely associated "public interest" with safety, accountability, access, and quality of care, reflecting alignment with CMLTO's regulatory mandate.

#### 3. Representation and Inclusion

- **Moderate sense of representation:** While 82.81% felt their communities were represented by the CMLTO's purpose and role, there remains room to increase inclusivity and representation, especially among equity-deserving groups (some of whom shared community affiliations in open-text responses).

#### 4. Desire for Broader Regulation

- **Support for regulation of all lab professionals:** 86.57% of respondents supported the idea that all medical laboratory professionals (including assistants and technicians) should be regulated, citing public safety, accountability, and standardization of qualifications.

#### 5. Interest in Engagement

- **Interest in ongoing dialogue:** Approximately 42% expressed interest in participating in a future focus group, indicating a willingness to engage further and share more detailed perspectives.

#### Cross-Cutting Themes



- **Public confidence is high but not universal:** While the majority feel well-served and safe, specific barriers and gaps in representation suggest opportunities for outreach, particularly to rural and equity-deserving communities.
- **Support for expanded oversight:** The desire for regulation of currently unregulated roles reflects public concern about equity and consistency in care.
- **Engagement potential exists:** A solid foundation of public trust presents a strategic opportunity for CMLTO to enhance its public-facing education and engagement efforts.

## 2025 Public Focus Group

### Theme 1: Understanding and Protecting the Public Interest

#### 1.1 Expectations of the Medical Laboratory System

Participants associated “public interest” with:

- **Safety, trust, professionalism, accountability, and transparency**
- Confidence that the person drawing blood or handling sensitive samples is **qualified, certified, and regulated**
- Assurance of **quality assurance programs**, ongoing education, properly maintained equipment, and standardized practices across labs and hospitals
- Consistency in lab results, benchmarking, and adherence to standards

#### Key concern:

Participants were **surprised and alarmed** to learn that MLATs and phlebotomists are *not* regulated, despite their direct contact with patients.

#### 1.2 Risks and System Weaknesses Identified

Participants raised concerns about:

- **Private laboratory monopolies**, including the impact of corporate acquisitions such as LifeLabs by an American company
- **Inconsistent training and oversight** in private labs
- **Chain of custody**, test accuracy, contamination control, and proper equipment sterilization
- **Opaque lab processes**, particularly “behind-the-scenes” roles they do not understand



- **Accessibility issues**, including wait times, staffing levels, and geographical availability of specialized technologists
- Lack of public visibility into **complaints, discipline**, and quality controls
- Concerns around **AI accountability**, computerized systems, and information security

### 1.3 Expectations for the CMLTO Board

Participants believe the Board should:

- **Increase public awareness** of the lab sector, including the regulation gap for MLATs
- Ensure **transparency**, particularly about standards, investigations, and discipline files
- **Advocate with government** for MLAT regulation and overall improvements in the system
- Set expectations for **wait times, staffing, and service standards** in labs
- Ensure equitable treatment of all individuals and consideration for accessibility
- Use **traditional and social media** to communicate the regulatory landscape and priorities

#### Overall sentiment:

Participants want a more **open, proactive, and accountable** regulatory presence—one that informs the public rather than waiting for media coverage to reveal problems.

### Theme 2: Trust in the Medical Laboratory Profession

#### 2.1 Trust in Medical Laboratory Technologists (MLTs)

Participants expressed **high trust** in MLTs due to:

- Speed and accuracy of results
- Perception of strong technical knowledge
- Awareness that MLTs are regulated and must meet standards

#### 2.2 Trust in Medical Laboratory Assistants and Technicians (MLATs)

Trust dropped significantly upon learning MLATs are unregulated.

Participants noted:



- They previously *assumed* regulation existed
- Lack of regulation = **lack of accountability**
- Concern about bruising, improper collection, errors, or unsafe practices
- Fear that unregulated providers may not be adequately trained
- Lack of consequences for misconduct or poor technique

**Privacy concerns** also emerged:

- Access to patient data feels too broad within hospital systems
- Public wants assurance that privacy breaches are actively prevented and disciplined

### 2.3 Overall Public Trust

- Trust in the lab *system* weakened after learning about the regulation gap
- Trust in *individual technologists* remains strong
- Trust in *technicians/assistants* is more like “faith,” not confidence

## Theme 3: Perspectives on Regulation

### 3.1 Strong Support for Regulatory Oversight

The group expressed **unanimous support** for regulating MLATs.

Reasons include:

- Safety and risk mitigation
- Reassurance of training and competence
- Prevention of serious harm from poorly trained personnel
- Ability to hold individuals accountable
- Consistency and standardization across the province
- Parallels with U.S. and other provinces where MLATs are regulated

Participants believe the current situation is:

- **“Short-sighted”**
- **Not in the public interest**
- **Contradictory** (frontline staff unregulated; behind-the-scenes staff regulated)



### 3.2 Opportunities for Advocacy and Public Awareness

Participants recommended:

- Whitepapers, targeted media engagement, and public campaigns
- Infographics and simple explanations to help the public understand the lab system
- Leveraging both **traditional** and **social media** to raise awareness
- Working with other health sector regulators to promote transparency
- Ensuring the public knows **where and how to file complaints**

#### Cross-Cutting Themes

##### Transparency

Appeared in almost every discussion. Participants want:

- Clear education about who is regulated and why
- Access to complaint and discipline statistics
- Regular, proactive communication from CMLTO

##### Safety and Accountability

Safety is fundamental—participants want:

- Proper training
- Oversight of frontline roles
- Consistent standards and procedures
- Mechanisms to correct errors and discipline misconduct

##### Public Awareness

Participants repeatedly stated that:

- They did not know how the lab system works
- They would support regulation if they understood the current gaps
- The College has a role to **inform and educate**

##### High-Level Summary

Participants overwhelmingly believe:



- The current lack of regulation for MLATs and frontline staff **poses a risk to the public**
- Regulation strengthens public trust, ensures safety, and establishes accountability
- The CMLTO should advocate for regulation, increase transparency, and improve public communication
- Trust in MLTs remains high, but trust in the system overall decreases when regulatory gaps are revealed
- The Board should take a leadership role in raising awareness and ensuring that public interest—not professional interests—guides decisions

The overall tone of the session reflects **surprise, concern, but strong willingness to support** improvements to regulation and transparency.

## Employers

### 2025 Employer Focus Group

#### Discussion #1

#### Topic A: Risks from Unregulated Health Professionals

##### Themes:

- **Risk Exposure**
  - MLATs are the most significant unregulated risk due to their responsibility for pre-analytical steps (phlebotomy, specimen collection, accessioning, integrity checks). Sample mix-ups and improper patient ID were recurring concerns.
  - In rural areas, MLATs often work alone and may be asked to work outside their scope, heightening risk.
  - By contrast, scientists (MSc/PhD), Pathologist Assistants, and geneticists were generally not viewed as risks because of their education, close supervision, and limited direct patient sample handling.
- **Training and Competency**
  - Training for MLATs is short, inconsistent, and varies widely by school; some graduates are underprepared for real-world complexity (e.g., newborn heel sticks, handling patients with special needs).



- Many MLATs lack full understanding of *why* tasks matter for quality assurance, in contrast to MLTs who are regulated and accountable to the College.
- Internationally trained MLTs were praised for their stronger backgrounds and adaptability.
- **Mitigation and Culture**
  - Employers mitigate risk through SOPs, competency assessments, system access restrictions, MLT oversight, senior technologist reviews, double-check systems, and automation safeguards.
  - Risk assessments and mitigation planning are embedded into lab culture, though performance management for problematic MLATs consumes significant employer time.
  - A new Conestoga College program was noted as filling some training gaps in the Western GTA.
- **Accountability and Oversight**
  - CMLTO cannot address complaints about MLATs, leaving employers with full responsibility for discipline.
  - Employers expressed that regulation would give MLATs professional accountability, reduce performance management burdens, and provide public complaint mechanisms.

## Topic B: Skill Mix Trends

### Themes:

- **Expansion of MLAT Roles**
  - Staff shortages, automation, and the pandemic accelerated MLAT scope expansion, including operating instruments, pathology prep work, and broader pre-analytical tasks. Many of these changes have remained.
  - In rural and smaller labs, MLATs often make up the majority of staff.
- **MLT–MLAT Role Tensions**
  - MLTs often resist shifting tasks to MLATs, even non-critical duties, as unions file grievances when scope is blurred.
  - Some MLTs feel their role is being diminished, while MLATs appreciate new opportunities when training is adequate.



- Trust between the groups takes time and requires clarity of roles.
- **Risks and Oversight**
  - Employers stressed that MLTs have a mindset of accountability (“doing the right thing when no one is looking”) that MLATs may not share without regulation.
  - Expanded MLAT roles without regulation or consistent training may increase risk; stricter SOPs and competency assessments help mitigate but don’t eliminate it.
  - Employers questioned whether regulation would solve these risks or simply push employers to create *new unregulated roles*, similar to how PSWs emerged in nursing.
- **Need for Clarity**
  - Participants called for a clearly defined MLAT scope of practice to reduce “grey areas” between MLT and MLAT responsibilities.
  - Many are watching Nova Scotia’s regulation of MLAs to see how it unfolds.

### Topic C: Support for Regulation of MLATs

#### Themes:

- **Supportive Views**
  - Most participants supported regulation, seeing it as a tool to improve accountability, professional standards, and public protection.
  - Benefits include: mandatory continuing education, consistent entry-to-practice standards, proper use of MLAT skill sets, and reduced employer burden for performance management.
- **Concerns and Challenges**
  - Defining scope is a key barrier — especially determining what level of judgment MLATs can exercise, and what MLT oversight should mean in practice.
  - Employers worried regulation could increase costs (e.g., pay expectations), create recruitment challenges in northern Ontario, or fail to address all risks.
  - Grandfathering long-serving MLATs without formal training was raised as a practical concern.



- **Regional Differences**

- **South:** Abundant applicants, roster rarely used; employers prefer MLATs who have written competency exams.
- **North:** Reliant on roster; regulation could help ensure quality since MLATs often work independently, but recruitment remains a major challenge as education programs are concentrated in the south.

- **Mixed Perspectives**

- Some employers feared regulation would be a “band-aid” solution or lead to workarounds.
- In private labs, MLATs are already seen as accountable, making regulation feel less urgent.
- Overall, employers acknowledged regulation may not solve everything but would be “another tool in the pocket.”

- **Advocacy and Implementation**

- Suggestions included: use public complaint data to demonstrate need, secure hospital CEO support, and embed regulation into lab standards of practice.

## Discussion #2

### Topic D: Health Human Resources (HHR) Trends

#### Themes:

- **Risks and Pressures**

- MLT shortages, widespread burnout, and poor morale are ongoing, with COVID-19 leaving lasting impacts.
- Generational shifts: younger MLTs prefer part-time or flexible work, sometimes exploiting union loopholes, while older staff are reluctant to mentor or lead.
- Geographic disparities: rural and smaller sites lack backup capacity, making shortages more acute.
- Labs feel undervalued and excluded from health system recognition (e.g., omitted from pandemic bonuses, Ontario Health planning, screening initiatives).

- **Workforce Gaps**



- Shortage of clinical placements and inadequate integration of internationally trained MLTs hinder supply.
- Retirements drain institutional knowledge, leaving leadership gaps as younger staff take on roles without sufficient experience.
- **Mitigation**
  - Employers rely on overtime, retirees returning part-time (considered a “saving grace”), and agency staff (though costly).
  - Competency checklists are used to ensure readiness regardless of training background.
  - Pathologist Assistants, while experiencing scope creep, are seen as lower risk due to extensive education; some suggested they too may warrant regulation.
- **Systemic Issues**
  - Teaching and supervising students adds strain to already overburdened MLTs with little recognition.
  - Employers described lab advocacy as weak compared to other health professions, and felt lab voices are often absent from decision-making tables.
- **Future Directions**
  - Calls for stronger advocacy by MLPAO, CSMLS, and CMLTO to raise the lab’s profile with government.
  - Patient stories identified as powerful tools for advocacy.
  - Clearer definitions of scope for all lab roles (MLAs, PAs, MLTs) seen as increasingly important as responsibilities shift.
  - Some employers suggested hybrid models (e.g., combined lab/X-ray technologists, used in other provinces) to address rural staffing gaps.

### **2025 Employer Survey**

#### **Strong Understanding of the College’s Mandate, But Limits on Perceived Role**

**Theme:** *Clarity on Public Protection vs. Limits on Workforce Involvement*

Employers clearly understand and support the CMLTO’s role in public protection. However, they generally do not see the College as having a direct role in health



human resource (HHR) planning—except in scenarios where staffing gaps may risk public safety (e.g., use of unregistered practitioners).

### **Systemic Barriers in Recruitment and Registration**

**Theme:** *Delays and Bottlenecks in MLT Onboarding*

There are concerns that the time required to process CSMLS exam results and CMLTO registration creates barriers to timely hiring. This is seen as a particular problem in an already competitive market with a limited MLT supply.

### **Ongoing Staffing Shortages as a Sector-Wide Concern**

**Theme:** *MLT Shortages and Competitive Market Impacts*

A critical issue identified is the shortage of MLTs, coupled with high turnover or “job hopping.” Conversely, there is a larger applicant pool for MLA/Ts, though the hiring process is still viewed as too long. Staffing shortages were consistently tied to potential declines in laboratory service quality, which respondents flagged as a public safety risk.

### **Strong Support for Regulating MLA/Ts**

**Theme:** *Perceived Public Risk and Desire for Oversight*

A majority of respondents believe the lack of regulatory oversight for MLA/Ts presents a risk to public safety. There is strong support for:

- Licensing and regulation of MLA/Ts
  - Defined scope of practice
  - Ongoing competency and conduct standards
- Some hesitations remain around the practicality of hiring from a limited Voluntary Roster.

### **Support for Voluntary Roster with Mixed Practical Value**

**Theme:** *Conceptual Support, but Limited Hiring Impact*

While employers conceptually support the use of the CMLTO Voluntary Roster in hiring MLA/Ts, several note that its influence is limited due to the small number of Roster members or hiring constraints. One respondent expressed concern that Roster expectations might deter applicants.

### **Value in Broader Sector Collaboration**

**Theme:** *Strategic Input Requires Diverse Stakeholder Engagement*

Respondents recommend that CMLTO engage with a broad array of stakeholders for



strategic initiatives, including HR leaders, lab directors, frontline staff, and educational institutions across the public and private sector.

### **Staffing Shortages as a Major Public Safety Risk**

**Theme:** *Workforce Gaps Directly Impact Service Quality*  
Employers overwhelmingly view understaffing as the most serious risk to public safety in the lab sector. Concerns also extend to innovation stagnation following the collapse of OLMP (Ontario Laboratory Accreditation Program).

### **Accessibility and Responsiveness of the College**

**Theme:** *Positive Perception of Transparency and Communication*

Respondents found CMLTO's complaints process accessible and understandable. Most reported being able to access information about registrants and HHR data when needed.

### **New Registrants**

#### **New Registrant Survey 2023**

##### Confidence in Ontario Laboratory Services

Overall, respondents expressed a high level of confidence in the quality of laboratory services in Ontario and in the role of the CMLTO in ensuring that Medical Laboratory Technologists remain competent, qualified, and accountable through registration and ongoing professional requirements. Many also emphasized the shared responsibility between CMLTO and laboratory employers in maintaining service quality. One respondent also indicated that members of the public may not clearly understand the CMLTO's regulatory role.

##### Health System Trends

Respondents identified several system-level pressures affecting the laboratory profession, including significant workforce shortages, a large number of retirements, and the lingering impacts of the COVID-19 pandemic. These factors have contributed to increased workloads and accelerated transitions into leadership roles for some MLTs. Additional trends noted include limited training program capacity, staffing challenges in northern Ontario, and concerns about the lack of advocacy and visibility for the profession. Some respondents also pointed to barriers faced by internationally educated MLTs, including high costs and complex prior learning assessment processes.



### Thoughts on Unregulated Professionals Working in Laboratories

Most respondents did not support allowing unregulated individuals to work in laboratories to address staffing shortages. They emphasized that the extensive education, training, and ongoing professional development required for registration are essential for ensuring patient safety and service quality. Some respondents expressed concern that introducing unregulated workers could undermine professional standards or be demoralizing to registered professionals. A small number of respondents indicated conditional support, suggesting it might be acceptable only with clear oversight, defined roles, and regulatory safeguards, particularly for internationally trained professionals working under supervision.

### Access to CMLTO Services (Registration Process)

Respondents generally believed that the CMLTO registration process is accessible, but many noted areas where it could be improved. Common concerns included confusion about required documentation, difficulty understanding application questions, and a lack of streamlined guidance throughout the process. Some respondents suggested removing requirements such as submitting original notarized documents and recommended additional educational resources or courses to help registrants maintain their registration. Several respondents also highlighted that costs and procedural complexity create barriers for internationally educated MLTs seeking registration in Ontario.

### 2025 Registrant Focus Group

#### 1. What do you understand “protection of the public” to mean?

##### Themes:

- **Accountability & Competence:** Professionals must maintain high standards and be held responsible for their actions.
- **Accuracy & Quality:** Laboratory results must be correct and reliable as they directly impact patient care.
- **Trust & Transparency:** Public relies on unseen processes; transparency builds confidence.
- **Confidentiality & Privacy:** Safeguarding patient data and specimen integrity.
- **Standardization & Ethics:** Consistent procedures and adherence to ethical standards.
- **Public Awareness:** Educating patients about lab processes to empower them.



- **Risks & Failures:** Mishandled samples and workforce constraints undermine trust.
- **Continuous Education:** Ongoing competency checks and training are essential.

## 2. Do you think CMLTO is operating in the public interest?

### Themes:

- **Licensing & Certification:** Mandatory registration ensures qualified professionals.
- **Quality Assurance & Continuing Education:** Programs reinforce skills and knowledge.
- **Fraud Prevention:** Protecting against unqualified individuals.
- **Education Concerns:** Shortened programs and bridging pathways may compromise quality.
- **Regulation Gaps:** Non-MLT staff performing tasks without oversight.
- **Collaboration & Awareness:** Need for better public understanding and inter-organizational cooperation.
- **Clinical Experience vs Theory:** Hands-on experience is critical for competence.

## 3. What can CMLTO do better to protect the public?

### Themes:

- **Increase Public Awareness:** Educate patients on lab roles and processes.
- **Regulate MLAs:** Oversight for assistants to ensure accountability.
- **Employer Accountability:** Collaboration with institutions to enforce standards.
- **Transparency:** Inform public about qualifications and processes.
- **Strengthen Competency Checks:** Especially for internationally trained professionals.
- **Continuing Education Support:** Provide accessible resources like webinars.
- **Collaboration with Other Colleges:** Learn from other health professions' regulatory models.

## 4. Do you support regulatory oversight of medical laboratory assistants and technicians? Why or why not?

### Themes:



- **Broad Support for Regulation:** Seen as essential for public safety and accountability.
- **Quality & Ethics:** Ensures adherence to standards and ethical practice.
- **Workforce Challenges:** Concerns about microcredentials and lack of exams.



## Key Developments of Ongoing CMLTO Board of Directors Linkage Initiatives

Since 2022, the CMLTO Board has advanced its linkage work through a multi-year, evolving approach:

- 1. Foundational learning and design (2021–2023):** The Board strengthened shared understanding of linkage concepts, clarified the purpose of linkage as a governance function, and undertook structured engagement with key careholder groups to guide Ends policy direction.
- 2. Shift to an ongoing/perpetual linkage model (2024–2025):** The Board moved from episodic engagement toward a more continuous plan designed to (a) build relationships and trust, (b) share accountability/education messages about CMLTO's role and impacts, and (c) seek systemic input on priority governance questions (e.g., public interest, trust, equity, regulatory gaps).
- 3. Expanded careholder scope and inclusion intent:** The plan broadened linkage beyond traditional channels by identifying additional sub-groups and exploring ways to hear from people who may experience barriers to accessing laboratory services, with an explicit emphasis on listening, learning, and risk mitigation.

### Purpose of Summary

The following results have been summarized from engagements that took place after the approval and implementation of the 2024-2025 Board/Careholdership Linkage Plan. The results are from the following activities, specifically:

- **System-level input gathering** (e.g., structured focus groups and consultations with careholder groups).

### Public

#### 2025 Public Survey:

Survey results from February to May 2025 indicate strong public trust and confidence in medical laboratory services, with over 92% of respondents expressing trust in laboratory professionals and 91% reporting access to services in their community, though some noted barriers such as travel, wait times, and limited availability.

All respondents indicated that the description of CMLTO's role aligned with their understanding, and many associated the public interest with safety, accountability, access, and quality of care. While 82.81% felt their communities were represented



by CMLTO's purpose and role, responses suggested opportunities to improve inclusivity and representation, particularly among equity-deserving groups.

Additionally, 86.57% supported the regulation of all medical laboratory professionals, including assistants and technicians, citing public safety, accountability, and standardized qualifications.

About 42% expressed interest in participating in future focus groups, indicating willingness to engage further with CMLTO.

### **2025 Public Focus Group:**

Focus group participants associated the public interest in laboratory services with safety, trust, professionalism, accountability, transparency, and confidence that individuals handling patient samples are qualified and regulated.

While participants expressed strong trust in Medical Laboratory Technologists due to their perceived expertise and regulation, trust declined significantly when they learned that Medical Laboratory Assistants and Technicians (MLATs) and phlebotomists are not regulated, which raised concerns about training, accountability, and patient safety.

Participants also identified broader system concerns, including private laboratory consolidation, inconsistent oversight in private labs, accessibility challenges such as wait times and staffing levels, limited public visibility into complaints and discipline processes, and risks related to data privacy and emerging technologies.

The group strongly supported regulating MLATs to improve safety, accountability, and consistency, and emphasized the importance of greater transparency and public education about the laboratory system.

Participants indicated that CMLTO should play a more visible and proactive role by raising public awareness, advocating for regulation, improving transparency around standards and disciplinary processes, and communicating more actively about the regulatory landscape.

## **Employers**

### **2025 Employer Survey:**

Survey respondents demonstrated a strong understanding of the role of the College of Medical Laboratory Technologists of Ontario (CMLTO) in protecting the public, while generally viewing health human resource (HHR) planning as outside the College's primary mandate unless staffing shortages pose a direct risk to patient safety, such as through the use of unregistered practitioners.



Employers identified significant workforce pressures across the laboratory sector, including ongoing shortages of medical laboratory technologists, high turnover, and delays in onboarding new professionals due to the time required for exam results and registration processing. These workforce challenges were widely viewed as potential risks to service quality and public safety.

Respondents expressed strong support for regulatory oversight of medical laboratory assistants and technicians, including licensing, defined scopes of practice, and competency standards, though opinions were mixed on the practical impact of the CMLTO Voluntary Roster in hiring.

Participants also emphasized the importance of broad collaboration with sector partners on strategic initiatives and generally viewed the College as transparent and accessible, particularly in relation to complaints processes and information about Registrants.

### **2025 Employer Focus Group:**

Focus group participants identified Medical Laboratory Assistants and Technicians (MLATs) as the most significant risk among unregulated professionals due to their responsibility for pre-analytical tasks such as specimen collection, patient identification, and sample handling.

Participants noted that MLAT training varies widely and may not fully prepare graduates for complex clinical situations, while employers currently mitigate risk through standard operating procedures, competency assessments, oversight by Medical Laboratory Technologists (MLTs), and automation safeguards.

Workforce pressures—including ongoing MLT shortages, burnout, geographic disparities, limited clinical placements, and challenges integrating internationally trained professionals—were also highlighted as system challenges.

Many participants supported regulating MLATs to strengthen accountability, standardize training and continuing education, provide complaint mechanisms, and reduce employer performance management burdens, although concerns were raised about defining scope of practice, potential recruitment challenges in northern Ontario, costs, and whether regulation alone would address underlying risks. Some brought up that the public does not have a voice if a concern were to be raised regarding an unregulated MLAT in the same way that they would be if they had a concern about the CMLTO registered MLT.

Participants also emphasized the need for clearer role definitions across laboratory professions, stronger advocacy for the laboratory sector, and greater recognition of laboratories within the broader health system.



Participants also mentioned appreciating advocacy efforts and information sharing about laboratories given the behind-the-scenes nature of the profession.

## Registrants

### 2025 Registrant Focus Group:

Focus group participants emphasized that protecting the public in medical laboratory practice means ensuring accuracy, accountability, and ethical conduct in all aspects of testing, alongside strong safeguards for patient privacy, specimen integrity, and consistent professional standards.

Registrants generally viewed the work of the College of Medical Laboratory Technologists of Ontario (CMLTO) as aligned with the public interest through quality assurance and continuing education requirements that help ensure MLTs remain competent and qualified. At the same time, participants identified several areas for improvement, including increasing public awareness of the laboratory profession, strengthening competency oversight, and improving collaboration with employers and other health regulatory bodies.

A key concern raised was the growing role of non-MLT staff performing laboratory-related tasks without formal oversight, which participants viewed as a potential risk to quality and public trust. As a result, there was broad support among Registrants for regulatory oversight of medical laboratory assistants and technicians to help ensure consistent standards, accountability, and protection of patient safety.

### Overarching Themes from All Groups:

- There was a clear understanding of CMLTO's role
- Broad support for the regulation of medical laboratory assistants and technicians from across all groups
- Call for increased public awareness about the laboratory system and the general regulatory landscape
- Desire for more visibility on how complaints are handled and the general reporting process

### Reflections on the CMLTO's Role in Protecting the Public Interest:

- CMLTO's role in protecting the public interest is related to maintaining safety, trust, professionalism, accountability, transparency, and confidence that regulated MLTs perform accurately, are held accountable, and perform ethical practices in all aspects of laboratory work



- Safeguarding patient privacy and maintaining consistent ethical standards in the profession were noted as well.



## Briefing Report to Board of Directors

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**Date** : January 30, 2026

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

**Subject** : Planning for April Board Generative / Strategic Directions Planning Session

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- |   |   |
|---|---|
| <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                   |   |

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### BACKGROUND:

In addition to its four regular Board meetings each year, the Board holds a dedicated **Generative / Strategic Directions Planning Session** to support longer-range strategic thinking and informed governance oversight. This session is intentionally designed to provide space for generative dialogue and strategic exploration, rather than formal decision-making, and to allow the Board to focus on emerging issues, system-level trends, and significant initiatives that may shape the College's future direction.

The session provides an opportunity for the Board to engage in broad, forward-looking discussions on matters such as evolving regulatory and public interest considerations, sector and environmental trends, major organizational initiatives, and the identification of emerging risks and opportunities. It also allows for deeper exploration of complex or evolving issues that may require additional context, scenario-based discussion, or further development before being advanced through the regular Board agenda cycle.

Unlike regular Board meetings, which are structured around time-limited agendas and formal governance responsibilities, this session is designed to allow the Board



to take the time needed for comprehensive discussion, reflection, and inquiry. This approach supports deeper insight and more informed strategic guidance, helping to ensure that future Board priorities and decisions are grounded in thoughtful, well-considered dialogue.

From a governance perspective, this session is important because it strengthens the Board's ability to exercise effective regulatory and strategic oversight by creating dedicated space for informed regulatory judgment and forward-looking dialogue that informs future policy direction, priorities, and decision-making in support of the College's statutory mandate and its duty to serve and protect the public interest.

In accordance with the **GP IV-30 Annual Planning Cycle & Annual Integrated Board Strategic Agenda/Work Plan Policy**, topics for the 2026 April Generative / Strategic Directions Planning Session are drawn from the Board's annual strategic agenda and work plan, which are shaped through ongoing environmental scanning, re-exploration of Ends (Critical Outcomes) policies, consultation with diverse stakeholders, Board member input, and consideration of governance, regulatory, public interest, and emerging issues to ensure alignment with the College's statutory mandate and strategic priorities.

Consistent with the 2025 annual planning process, the following topics have been identified for discussion at the 2026 April Generative / Strategic Directions Planning Session:

1. CMLTO Governance Modernization Plan Refresh
2. Implementation of the Global Diversity, Equity, & Inclusion Benchmark (GDEIB) Framework at CMLTO
3. CMLTO Board/Careholdership Linkage Plan

This briefing report is intended to prepare the Board for the April Generative / Strategic Directions Planning Session by:

1. Providing concise background information on each identified initiative,
2. Outlining the current status of each initiative,
3. Describing the proposed scope and focus of discussion for the April session, and
4. Confirming whether the proposed approach and planned areas of discussion align with the Board's expectations, priorities, and intended outcomes for the April planning session.

The report is intended to support informed, forward-looking discussion and shared understanding in preparation for the April session.



## TOPIC #1: CMLTO GOVERNANCE MODERNIZATION PLAN REFRESH

### Background

#### Approval of Governance Modernization Principles & Regular Updates to Board

The CMLTO Board of Directors approved the [CMLTO Governance Modernization Principles](#) in September 2022, establishing a framework to strengthen governance effectiveness, regulatory oversight, and public interest accountability. An Operational Plan supporting these principles was presented to the Board as part of the 2023 Registrar and CEO Ends Interpretation, which the Board accepted as reasonable at its February 2023 meeting. Since that time, the Board has received regular quarterly status updates on the Governance Modernization Plan as part of its ongoing oversight responsibilities.

Further information on governance modernization activities has also been provided through the Board's Ends Policy monitoring process and schedule. The Governance Modernization Plan Refresh builds on this established work and provides an opportunity to reflect on progress to date and support informed, forward-looking discussion at the April Generative / Strategic Directions Planning Session.

### Key Developments

As part of its ongoing governance modernization efforts, the Board has advanced several important initiatives since the approval of the **CMLTO Governance Modernization Principles** in September 2022, including:

- 1. Governance Modernization Through a Comprehensive By-Law Rewrite:**  
The Board approved a new CMLTO By-Law in December 2022 as a foundational governance instrument to strengthen regulatory oversight, clarify governance authorities and accountabilities, and support the Board's ability to fulfill its statutory mandate and public interest responsibilities.
- 2. Board Oversight of By-Law Alignment Through a Board Policies Gap Analysis:**  
To support effective governance oversight, the Board approved a By-Law Action Items List and undertook a comprehensive Board Policies Gap Analysis to assess alignment between the new By-Law and existing Board policies from a risk-based perspective. This work established a structured approach for achieving full alignment through the Board's regular policy review cycle, with ongoing monitoring and reporting to the Board.
- 3. Embedding Public Interest Considerations Through a Public Interest Assessment Framework:**  
In furtherance of its statutory duty under the *Regulated Health Professions*



*Act, 1991* to serve and protect the public interest, and consistent with High Level Ends Policy 1 – Public Trust in Health Professions Regulation, the Board has advanced the development of a Public Interest Assessment Framework to support systematic, transparent, and Board-level oversight of how public interest considerations are assessed and reflected in Board and statutory committee decisions.

Updates on both the **CMLTO By-Law – Board Policies Gap Analysis** and the **CMLTO Public Interest Assessment Framework** are provided to the Board on a quarterly basis as part of the Board’s ongoing governance oversight and monitoring of the Governance Modernization Plan.

**4. Strengthening Board Effectiveness Through a Board Competency Framework:**

The Board approved the CMLTO Board Competency Framework and Board Competency and Leadership Characteristics Profile, and subsequently endorsed the CMLTO Board Competency Framework Implementation Plan, establishing a competency-based approach to Board composition and development.

**5. Launch of the Implementation of the Global Diversity, Equity, & Inclusion Benchmark (GDEIB) Framework:**

The Board has initiated the implementation of the **GDEIB Framework** to embed equity, diversity, inclusion, and justice (EDI-J) principles across governance and organizational practices. At its May 2025 meeting, the Board committed to using the Framework as a validated, structured tool to support measurable progress, meaningful reporting, and evidence-based governance decision-making.

**6. Initiation of the Responsible Use of Artificial Intelligence (AI):**

In November 2025, the Board initiated the responsible use of Artificial Intelligence (AI) through the approval of the CMLTO Artificial Intelligence (AI) Strategy, the AI Governance Framework, and the Executive Limitations Policy EL II-60 – Use of Artificial Intelligence. Collectively, these instruments establish the Board’s strategic intent, governance oversight and monitoring expectations, ethical and risk-based guardrails, and clear delegation of authority to the Registrar & CEO, ensuring that the College’s use of AI remains transparent, accountable, and aligned with its statutory mandate to serve and protect the public interest.

**7. Completion of an External Evaluation of Board Effectiveness (2025):**

In 2025, the Board completed an External Evaluation of Board Effectiveness, prepared by **Governance Solutions Inc.**, as part of its governance oversight



and continuous improvement responsibilities, to assess Board performance and inform future governance effectiveness.

Collectively, these initiatives demonstrate the significant progress made since the Board approved the CMLTO Governance Modernization Principles in September 2022 and reflect a sustained, multi-year approach to strengthening governance, oversight, and public interest accountability. With this foundation in place, the Board is now positioned to step back and consider how effectively these efforts are advancing the intended governance outcomes and where further focus or refinement may be required.

### **Inputs to the April Generative / Strategic Directions Planning Session**

Building on the governance modernization work undertaken to date, the Board reviewed the outcomes and recommendations of the 2025 External Evaluation of Board Effectiveness, prepared by *Governance Solutions Inc.*, along with the Executive Committee's general feedback, at its meeting on November 21, 2025.

At the same meeting, the Board also reviewed a report summarizing key takeaways from the 2025 *Govern for Impact* Annual Learning & Connecting Conference, including emerging insights, initial considerations for next steps, and potential applications for strengthening the College's governance practices.

The April Generative / Strategic Directions Planning Session provides an opportunity for the Board to collectively examine these two inputs—the external assessment of Board effectiveness and the governance insights emerging from *Govern for Impact*—and to confirm which elements should inform the **Governance Modernization Plan Refresh**, consistent with the Board's strategic priorities, governance role, and public interest mandate.

This discussion is intended to inform and confirm the Board's preferred direction for the Governance Modernization Plan Refresh; detailed implementation decisions will follow through regular Board processes.

### **Governance Perspective and Considerations**

From a governance perspective, the **Governance Modernization Plan Refresh** represents an important opportunity for the Board to step back from individual initiatives and assess, at a system level, whether the collective body of governance modernization work undertaken since 2022 is coherently advancing the Board's intended governance outcomes and public interest obligations. With multiple foundational governance instruments now in place, the focus of this refresh is less on initiating new work and more on confirming strategic alignment, effectiveness, and sufficiency.



As governance modernization efforts now span multiple interconnected domains – including governance structure and authorities, Board effectiveness and competency-based governance, public interest assessment, equity, diversity, inclusion and justice, and the responsible use of emerging technologies—it is important that these initiatives are considered as an integrated governance framework rather than as discrete or standalone activities. Doing so supports clarity of Board intent, reinforces appropriate role discipline between governance and management, and strengthens the Board’s ability to exercise effective oversight and assurance.

Potential governance considerations associated with this work include the risk of initiative fragmentation, misalignment between governance intent and implementation, and unintended impacts on Board capacity or role clarity if priorities are not clearly articulated. There is also a need to ensure that modernization efforts remain appropriately scoped to the Board’s governance role, avoid operational drift, and are sequenced in a way that supports sustainable change and effective oversight.

The April Generative / Strategic Directions Planning Session provides an appropriate forum for the Board to reflect on these considerations, confirm shared understanding, and provide strategic guidance on the direction and scope of the Governance Modernization Plan Refresh.

### **Questions for Board Reflection and Alignment**

To support generative discussion and confirm alignment, the Board may wish to consider the following questions during the April session:

1. What must be in place, from an Ends and oversight perspective, to ensure the ongoing protection and advancement of the public interest as the Governance Modernization Plan is refreshed and implemented?
2. Do the initiatives proposed for inclusion in the Governance Modernization Plan Refresh appropriately reflect the Board’s current governance priorities and support the Board’s Ends (Critical Outcomes) and understanding of its governance role?
3. Are there governance risks, gaps, or unintended consequences that the Board believes should be more explicitly addressed to ensure effective oversight and accountability?
4. Is the scope and sequencing of the proposed modernization initiatives proportionate to the College’s regulatory context and aligned with the Board’s role, capacity, and oversight responsibilities?



5. Are there additional areas of governance practice or oversight that the Board believes warrant further exploration or inclusion as part of the Governance Modernization Plan Refresh?

### **Intended Outcome of the April Generative / Strategic Directions Planning Session**

The April Generative / Strategic Directions Planning Session is intended to support informed, forward-looking dialogue and may culminate in the Board confirming or approving the overall direction and scope of the Governance Modernization Plan Refresh.

## **TOPIC #2: IMPLEMENTATION OF THE GLOBAL DIVERSITY, EQUITY, & INCLUSION BENCHMARK (GDEIB) FRAMEWORK AT CMLTO**

### **Background**

CMLTO is advancing a strategic shift from equity, diversity, inclusion, and justice (EDI-J) as principle to EDI-J as practice, with a focus on ensuring that actions are tangible, measurable, and aligned with organizational accountability. This approach reflects the Board's commitment to embedding EDI-J as a core governance and organizational priority, rather than treating it as a standalone initiative.

At its May 2025 meeting, the CMLTO Board of Directors received a presentation from Darcy Belisle of Decibel DEI Consulting introducing the Global Diversity, Equity & Inclusion Benchmark (GDEIB) Framework. The GDEIB Framework provides a validated, structured approach to assessing organizational progress, supporting meaningful reporting, and informing evidence-based decision-making in the advancement of EDI-J.

Following this introduction, the Board committed to the use of the GDEIB Framework as the foundational structure for CMLTO's EDI-J implementation and accountability model. The Framework provides a comprehensive, internationally recognized benchmark system covering leadership, workforce, culture, equitable practices, and accountability, and evaluates progress across 15 categories organized into four benchmark groupings: Foundation, Internal, External, and Bridging. Progress is assessed using a five-level maturity model, with Level 5 representing recognized best practice.

This model enables organizations to assess current state, identify gaps, and plan structured, measurable improvements over time.

### **Key Developments**



As part of the Board's commitment to embedding EDI-J within governance and organizational practice, the following foundational steps have been advanced:

- 1. Adoption of the GDEIB Framework as CMLTO's EDI-J Benchmarking Model:**  
The Board has committed to the use of the GDEIB Framework as a validated, structured tool to support evidence-based assessment, meaningful reporting, and measurable progress in EDI-J across governance and organizational domains.
- 2. Establishment of a Phased Implementation Model:**  
CMLTO's GDEIB implementation has been structured into three integrated phases:
  - Step 1 – Inventory of Current EDI-J Activities and Evidence
  - Step 2 – Baseline Assessment and Gap Analysis
  - Step 3 – Implementation Planning and EDI-J Strategy Development

This phased approach supports disciplined sequencing, governance oversight, and sustainable organizational change.

### **Current Status**

CMLTO is in the final stages of completing **Step 1 – Inventory of Current EDI-J Activities and Supporting Evidence**.

This work involves identifying and documenting existing EDI-J commitments, practices, processes, and supporting evidence across the organization.

CMLTO's EDI-J commitments are articulated across a set of core governance and organizational documents, which collectively establish expectations for behaviour, guide Board governance, define organizational priorities, and communicate CMLTO's values to staff, Registrants, applicants, and the public. This inventory forms the evidentiary foundation for the GDEIB assessment process.

Concurrently, the **CMLTO Global Diversity, Equity & Inclusion Benchmark Gap Analysis** is underway, consolidating this inventory into a structured assessment framework.

### **Inputs to the April Generative / Strategic Directions Planning Session**

At the April Generative / Strategic Directions Planning Session, the Board will be presented with Step 2 – Baseline Assessment and Gap Analysis, which will:

- Assess CMLTO's standing across all GDEIB categories and benchmarks,
- Document current strengths and accomplishments, and



- Identify gaps that may be translated into short-term and medium-term priorities.

Subject to timing and readiness, the session may also introduce elements of Step 3 – Implementation Planning, including the early structure of a formal CMLTO EDI-J Strategy, aligned with global best practices and informed by the GDEIB assessment results.

The April session will therefore serve as the Board’s first opportunity to engage at a strategic level with the organization’s baseline EDI-J maturity profile and to shape the direction, scope, and ambition of CMLTO’s EDI-J implementation trajectory.

### **Governance Perspective and Considerations**

From a governance perspective, the implementation of the GDEIB Framework represents a shift from values articulation to **governance accountability architecture**. It provides the Board with a structured, evidence-based mechanism to exercise oversight of EDI-J as a core dimension of organizational performance, risk, and public trust.

The GDEIB Framework enables the Board to move beyond aspirational commitments toward measurable governance outcomes, supporting transparency, comparability, and accountability in how EDI-J is embedded across governance, culture, operations, and external relationships.

Key governance considerations include ensuring that:

- EDI-J implementation remains aligned with the Board’s Ends and public interest obligations,
- The scope and pace of implementation are proportionate to organizational capacity,
- Accountability mechanisms are clear and monitorable, and
- EDI-J governance remains integrated into core oversight structures rather than treated as a parallel or siloed initiative.

The April Generative / Strategic Directions Planning Session provides a strategic forum for the Board to confirm its governance expectations for EDI-J maturity, oversight, and accountability as this work advances.

### **Questions for Board Reflection and Alignment**



To support generative discussion and confirm alignment, the Board may wish to consider:

1. What level of EDI-J maturity and accountability should the Board expect CMLTO to achieve over the next governance cycle, and how should this be reflected in strategic priorities and oversight expectations?
2. How should the Board use the GDEIB Framework to support its understanding and oversight of organizational performance, risk exposure, and public trust?
3. What must be in place to ensure that EDI-J implementation remains measurable, evidence-based, and aligned with the College's public interest mandate?
4. How should EDI-J governance be integrated into existing oversight, monitoring, and reporting structures to avoid fragmentation or duplication?
5. What direction and expectations does the Board wish to set regarding the priority, pace, and scope of EDI-J implementation at CMLTO?

#### **Intended Outcome of the April Generative / Strategic Directions Planning Session**

The April Generative / Strategic Directions Planning Session is intended to support informed, forward-looking dialogue and may culminate in the Board confirming the strategic direction, governance expectations, and implementation scope for the GDEIB Framework at CMLTO, including the alignment of EDI-J priorities, accountability mechanisms, and oversight structures with the College's statutory mandate and public interest responsibilities.

### **TOPIC #3: CMLTO BOARD/CAREHOLDERSHIP LINKAGE PLAN**

#### **Background**

Board/Careholdership (Ownership) Linkage is a core governance responsibility that supports the Board's accountability to Ontarians by intentionally seeking perspectives on Ends (Critical Outcomes) Policies and on the ethics, prudence, and equity by which outcomes are pursued.

CMLTO's linkage approach is grounded in Governance Process Policy [GP IV-45 Board Linkage With Ownership/Careholdership](#), and is designed to ensure that Board policy direction remains informed by careholder values, emerging system-level concerns, and public trust considerations, without drifting into operational service matters that are delegated to the Registrar & CEO and monitored through Ends results and Executive Limitations reporting.



The Board's linkage work accelerated beginning in 2022–2023 through focused learning and "deep dive" engagement with representative careholder groups. Insights from those engagements were used to inform the Board's refreshed 2024–2026/2027 Ends (Critical Outcomes) Policy direction and related strategic framing.

### Key Developments

Since 2022, the CMLTO Board has advanced its linkage work through a multi-year, evolving approach:

- 1. Foundational learning and design (2021–2023):** The Board strengthened shared understanding of linkage concepts, clarified the purpose of linkage as a governance function, and undertook structured engagement with key careholder groups to guide Ends policy direction.
- 2. Shift to an ongoing/perpetual linkage model (2024–2025):** The Board moved from episodic engagement toward a more continuous plan designed to (a) build relationships and trust, (b) share accountability/education messages about CMLTO's role and impacts, and (c) seek systemic input on priority governance questions (e.g., public interest, trust, equity, regulatory gaps).
- 3. Expanded careholder scope and inclusion intent:** The plan broadened linkage beyond traditional channels by identifying additional sub-groups and exploring ways to hear from people who may experience barriers to accessing laboratory services, with an explicit emphasis on listening, learning, and risk mitigation.

### Current Status

The CMLTO Board approved the **2024–2025 Board/Careholdership Linkage Plan** and implementation has proceeded through multiple channels and engagement methods. Recent reporting (including the September–December 2025 update period) indicates the plan has supported both:

- **Education/accountability outreach** (e.g., governance and regulatory information shared through website, newsletter, and social media channels), and
- **System-level input gathering** (e.g., structured focus groups and consultations with careholder groups).

Early themes emerging from careholder input continue to reinforce governance-significant issues tied to public trust, transparency, accountability, and perceived regulatory gaps, including questions related to unregulated roles in the laboratory system and the public interest implications for oversight.



## Proposed Scope and Focus of the April Generative / Strategic Directions Planning Session

The April Generative / Strategic Directions Planning Session will involve reviewing the key concepts and first principles of Careholdership (Ownership) Linkage to further understand the differentiation between true “owner” or “Careholder” level feedback, and customer level feedback. The session will also be an opportunity for the CMLTO Board to step back from the mechanics of specific engagement activities and focus on governance-level learning and direction-setting, including:

- Whether the current linkage approach is yielding the type of Ends-relevant insight the Board needs,
- What the Board is learning about public trust, system risks, and careholder values, and
- What direction should shape the next iteration of the linkage plan (e.g., 2026–2027), including priorities, target groups, and cadence.

### Governance Perspective and Considerations

From a governance perspective, the linkage plan is a primary tool through which the Board ensures its policy direction remains connected to the values and lived realities of the careholdership, particularly on questions of public interest protection and trust in regulation. The Board’s opportunity (and responsibility) is to ensure linkage is designed to produce usable governance insight that informs Ends (Critical Outcomes) Policies, strengthens strategic foresight, and surfaces emerging risks.

Key governance considerations include:

- **Role discipline:** ensuring linkage stays focused on “what/why” (Ends and values) rather than operational “how,” while still capturing meaningful insight about how the public experiences system impacts.
- **Representativeness and equity:** ensuring the Board hears from a sufficiently broad and diverse set of careholders, including those who may face barriers, in a way that is meaningful rather than symbolic, and without over-reliance on any single channel.
- **Risk and expectation management:** mitigating reputational and trust risks by being transparent about what input will be used for, what changes are possible, and how CMLTO will communicate back (“closing the loop”).
- **Use of linkage insights:** ensuring what is learned is clearly reflected in Board sense-making and, where appropriate, policy direction, monitoring focus, or strategic priorities.



In developing the next Board/Careholdership Linkage Plan, the Board may also wish to clarify how linkage insight will be used in Board decision-making, what types of signals warrant Board-level attention, and how linkage complements risk oversight, Ends monitoring, and transparency expectations.

### **Communications Perspectives and Considerations**

Effective Careholdership (Ownership) Linkage depends on a clear distinction between Careholder/Owner input and other forms of customer-level feedback. True Careholder/Owner input relates to ownership of the organization, rather than experiences key partners have associated with receiving services. Understanding where Careholders/Owners fit in relation to the Board, and the purpose of maintaining linkage with them, is foundational to guiding the strategic direction of the College.

In advance of further engagement activities, it is recommended that the Board revisit key concepts and first principles of Careholdership/Ownership Linkage, including how the Board defines Careholders/Owners that it wishes to connect with. Research indicates that many Boards face challenges in developing linkages with fully representative Careholder or Owner groups.

The proposed facilitation is intended to support structured discussion and reflection on who the Board is seeking to link with, why those groups have been identified, and how representative Careholder/Owner input is defined. This discussion is intended to inform the development of the next iteration of the Careholdership (Ownership) Linkage Plan.

The intended outcome of this session is to support and enhance Board understanding of Careholdership (Ownership) Linkage principles and to inform future approaches to Careholder engagement within an accountable governance framework.

### **Proposed Approach for Developing the Next Linkage Plan**

To support continuity and governance clarity, the following approach can guide development of the next plan cycle:

1. In alignment with the first principles and key concepts of Careholdership (Ownership) Linkage, how can the Board define the Careholdership that would help guide the College to achieve its Ends?
2. **Confirm Board intent and priority questions (April):** Identify the 3–5 priority “Ends and values” questions the Board most needs answered over the next cycle.



3. **Confirm careholder groups and inclusion strategy (April):** Validate which groups must be engaged, where representation needs strengthening, and what engagement methods are most credible and feasible.
4. **Define governance outputs and feedback loops (April):** Confirm how results will be synthesized for Board use (themes, risk signals, Ends implications), and how the CMLTO will communicate outcomes back to participants and the public.
5. **Integrate into the annual planning cycle:** Align timing, resourcing, and reporting cadence with GP IV-30 and Board work plan priorities, including how linkage insight will be brought into Ends re-exploration and monitoring emphasis.
6. **Establish a monitoring rhythm:** Confirm how progress and themes will be reported to the Board (e.g., quarterly highlights plus an annual analysis).

#### Questions for Board Reflection and Alignment

To support generative discussion and confirm alignment, the Board may wish to consider:

1. **Purpose and use:** What are the most important governance decisions or policy areas the Board wants linkage insight to inform over the next cycle?
2. **Ends and values focus:** What “what/why” questions should be prioritized to strengthen Ends (Critical Outcomes) direction and the Board’s understanding of careholder values?
3. **Risk awareness and trust considerations:** What risks to public trust, public safety, or regulatory credibility does the Board most need linkage to help identify early?
4. **Inclusion and representation:** Which careholder voices are currently underheard, and what approach should be used to engage them respectfully and credibly?
5. **Closing the loop:** What does the Board expect in terms of transparency and accountability back to careholders (i.e., how CMLTO communicates what was heard and how it was used)?

#### Alignment of the Board/Careholdership Linkage Plan with the Ends Policy Refresh

As the Board prepares for the next refresh of the Ends (Critical Outcomes) Policies following the current 2024–2026/27 period, the Board/Careholdership Linkage Plan plays a critical role in supporting informed governance judgment. The Linkage Plan is intended to provide the Board with structured, relevant insight into careholder values, expectations, and emerging risks that may affect the achievement of the



College's Ends, including public trust, access to effective regulation, and professional accountability.

Rather than functioning as a general engagement exercise, linkage activities are designed to provide information that assists the Board in testing whether its Ends continue to reflect the most significant public interest needs, whether assumptions underlying existing Ends remain valid, and whether emerging trends or risks warrant refinement or clarification of the Board's strategic direction. This approach supports evidence-informed Ends development while preserving the Board's role in setting outcomes and the Registrar & CEO's role in interpretation and implementation.

Insights from linkage will guide Board discussion and deliberation at the April Generative / Strategic Directions Planning Session, with any subsequent amendments to the Ends Policies advanced through the Board's regular governance processes.

#### **Intended Outcome of the April Generative / Strategic Directions Planning Session**

The April Generative / Strategic Directions Planning Session is intended to support informed, forward-looking Board discussion and may culminate in the Board confirming the priority focus, governance questions, and design parameters for the next Board/Careholdership Linkage Plan, with detailed implementation planning to follow through regular Board processes.

### **TOPIC #4: CMLTO FINANCIAL PLANNING**

As part of the Registrar & CEO 2025 Summative Performance Appraisal process, the Executive Committee (EC) had asked the Registrar & CEO to engage the Board in a focused discussion on the organization's medium and long-term financial planning and overall financial condition (i.e., financial health) at the April meeting.

This request is made directly within the context of CMLTO's governance approach and the Board's desire for the CMLTO to have an effective financial plan and for the Board to fulfill its related fiduciary role. This request is made outside of the Board's policy parameters regarding budget assumptions and presentation of an annual budget. As such, there will not be a motion to approve a budget. That process will continue on throughout 2026 as per Board policy. The information presented and the related discussion will contribute to a high-level, forward-looking exploration of CMLTO's future financial model.



## Briefing Report to Board of Directors

**Date** : March 30, 2026  
**From** : J. Tzountzouris, Registrar & CEO  
**Subject** : CMLTO Financial Health: Current and Future State

### Report Purpose:

- |   |  |
|---|--|
| <input type="checkbox"/> <b>Board Policy Development, Review, and Approval</b><br><input type="checkbox"/> Ends Policy<br><input type="checkbox"/> Executive Limitations Policy<br><input type="checkbox"/> Board-CEO Relationship Policy<br><input type="checkbox"/> Governance Process Policy | <input type="checkbox"/> <b>Monitoring Report</b><br><input type="checkbox"/> Ends<br><input type="checkbox"/> Executive Limitations<br><input type="checkbox"/> Statutory Committee   |
| <input type="checkbox"/> <b>Board Implementation of Policy</b><br><input type="checkbox"/> Board-CEO Relationship Policy<br><input type="checkbox"/> Governance Process Policy  | <input type="checkbox"/> <b>Careholder Linkage Report</b><br><input checked="" type="checkbox"/> <b>Incidental Report</b><br><input checked="" type="checkbox"/> <b>Registrar &amp; CEO</b><br><input type="checkbox"/> Board Chair<br><input type="checkbox"/> Other: |

### **PUBLIC INTEREST:**

This report serves the public interest by strengthening the Board's oversight of CMLTO's long-term financial sustainability, ensuring that resources are managed prudently, transparently, and in alignment with its public protection mandate. By supporting informed, forward-looking governance dialogue on financial risks, trends, and sustainability, the Board is better positioned to safeguard the organization's capacity to effectively regulate in the public interest and maintain public trust.

### **BACKGROUND**

As a result of the Executive Committee's Registrar & CEO Performance Appraisal meetings held in December 2025 and January 2026, the Executive Committee, on behalf of the Board of Directors, has requested additional information regarding the organization's financial health. Specifically, the Board has asked for a briefing report addressing medium- and long-term financial conditions, revenue projections, the use of reserves, and expenditure management.

This request is understood as a forward-looking and generative exercise. Its purpose is to enhance the Board's understanding of emerging financial dynamics, support strategic dialogue, and inform future policy development. As such, the report is designed to provide insight into trends, risks, and potential scenarios that may influence the organization's financial sustainability over time.



In responding to this request, it is important to remain aligned with the principles of the Policy Governance® framework. The Board's role is to define organizational Ends (Critical Outcomes) Policy and establish governing policies (including Registrar & CEO monitoring), while the Registrar & CEO retains responsibility for operational planning and execution. Accordingly, this report does not seek Board approval of specific management plans, nor does it revisit or evaluate past operational performance, or compliance with Board policy.

Instead, the report presents analysis, context, and a range of considerations intended to inform the Board of Directors of the current and future state of the CMLTO's financial health, implications arising from this information being presented, and support generative discussion. Where appropriate, it outlines potential approaches and their implications, without advancing recommendations that would require Board endorsement of operational strategies. This ensures that the Board is equipped with the information necessary to fulfill its governance role, while preserving the clear distinction between governance and management inherent in the Policy Governance® model.

This report is therefore intended to facilitate strategic dialogue between the Board and the Registrar & CEO, fostering a shared understanding of the organization's medium- and long-term financial challenges and opportunities.

### **FINANCIAL OVERVIEW AND FORWARD OUTLOOK**

This section of the briefing report provides a strategic and analytical examination of the CMLTO's financial trajectory. It is intended to inform the Board's understanding of the organization's current financial model and its potential evolution over the medium and long term. Consistent with the purpose of this report, the analysis is presented to support insight and dialogue, rather than to persuade or seek endorsement of specific management actions.

The Board has previously received and accepted monitoring reports confirming compliance with established financial policies. Accordingly, this section does not revisit or reassess those determinations. Instead, it builds on that foundation by shifting focus from retrospective assurance to prospective analysis, offering a forward-looking view of financial sustainability.

The report outlines how the current financial model operates, including the relationships among revenue sources, expenditure patterns, and the use of reserves. It then examines the key drivers influencing financial performance, such as cost trends, anticipated changes in regulatory activity or service demand, and structural factors that may shape future outcomes. Underlying assumptions are made explicit throughout, distinguishing between known conditions, areas of uncertainty, and variables that could materially affect the organization's financial position over time.



Drawing on these elements, the report articulates a projected financial trajectory, highlighting emerging pressures and risks that may not be evident through compliance monitoring alone. This includes identifying areas where strain may be developing despite continued adherence to policy, thereby providing early insight into factors that could impact long-term sustainability.

The analysis also considers the relationship between financial resources and the achievement of organizational Ends, recognizing this as a critical dimension of governance. Where appropriate, the report presents illustrative options or considerations for addressing identified pressures. These are not recommendations requiring Board approval, but rather examples intended to support understanding of potential implications and trade-offs. Accountability for selecting and implementing operational approaches remains with the Registrar & CEO, within the constraints established by Board policy.

Overall, this section is structured to move logically from context and current state to forward-looking analysis and governance implications, serving as a bridge between past performance and future-focused governance.

#### **Current Financial Model Overview**

A health professional regulatory College is primarily funded through fees paid by its Registrants, such as initial registration and annual renewal fees. These fees cover the cost of regulating the profession, including meeting the regulatory requirements set out in the *Regulated Health Professions Act, 1991* (RHPA), achieving the Ends (Critical Outcomes) Policies articulated by the Board of Directors, and the costs of running the business. Additional revenue is received through other regulatory and non-regulatory functions, such as interest on investments, fees for registration related requests, and in the case of the CMLTO, Voluntary Roster associated fees and job postings.

All RHPA Colleges have roughly the same regulatory requirements, with more specificity being described in the regulations under the individual College's discipline specific legislation for such things as registration requirements and quality assurance program requirements.

Since the primary source of revenue is fees paid by Registrants, the simplest way to think about College funding in general and Registrant fees more specifically, is to determine how much it costs to achieve our various requirements and then to divide through by the number of Registrants. The aim is to have a balanced annual budget as a not-for-profit corporation. The first implication of this model is that Registrant fees and revenue vary directly with both the total number of Registrants (less registrants, the higher the fees) and the cost of regulatory service delivery (the more complex a College's "regulatory burden", the higher the Registrant fees).



On the expense side then, there are both fixed and variable annual costs. Fixed costs include such things as salaries & benefits and the cost of running the organization. Variable costs relate more to regulatory and strategic functions, with the Board of Directors directing the latter through the organization’s Ends (Critical Outcomes) Policy.

Finally, the CMLTO holds funds in reserve as prescribed by Executive Limitations Policy EL II-17: Summary of Financial Numerical Limitations as follows:

Sexual Abuse Therapy Fund	\$60,000
Professional Conduct Fund	\$250,000
Contingency Fund	\$1,300,000
Strategic Challenge Fund	\$100,000
Fee Stabilization Fund	\$ 360,000
<b>Total</b>	<b>\$2,070,000</b>

A five-year overview of revenue, expenses, surplus/deficit and reserve/operating funds is presented below (\*2025 data is unaudited):

Year	Revenue	Expenses	Surplus / Deficit	Operating Fund	Reserves
2021	\$2,410,180	\$2,287,700	\$122,480	\$1,238,343	\$2,070,000
2022	\$2,396,599	\$2,104,428	\$292,171	\$1,609,405	\$2,070,000
2023	\$2,477,679	\$2,247,328	\$230,351	\$1,773,070	\$2,070,000
2024	\$2,540,361	\$2,716,665	-\$176,304	\$1,673,374	\$2,070,000
2025 *	\$2,545,982	\$2,936,033	-\$390,051	\$1,196,309	\$2,070,000

At a high level, five-year financial trend indicates that:

1. CMLTO continues to be in a healthy financial position heading into 2026.
2. There is no immediate or medium term need to consider using any reserve funding.
3. If an ongoing deficit is projected into the coming years, a Registration fee increase will need to be considered by the Board.

In terms of comparator data with other health regulatory Colleges, the following information is being shared with the Board of Directors based on the 2024 audited financial statements of all twenty-six (26) RHPA Colleges in Ontario:

- CMLTO has the **lowest** Registration fees of all 26 Colleges (\$340 for a Practising Certificate of Registration). The highest fee is \$3,075 for



Registrants of the Royal College of Dental Surgeons of Ontario (RCDSO), and the average Registration fee is \$1,174.56.

- The number of Registrants per Staff Count for the CMLTO is 705. This is the **highest** of all 26 Colleges. The lowest number is 76 at the College of Naturopaths of Ontario (CoNO), and the average is 259.
- The cost of operating the College per Registrant at the CMLTO is \$360.39, which is the **lowest** of all 26 Colleges. The highest is \$3,975 for the Royal College of Dental Surgeons of Ontario (RCDSO), and the average is \$1,311.53.

### Key Drivers of Financial Performance, Assumptions and Planning Context

Building on the historical data presented above, the medium-term financial health of the organization indicates that within four years, the operating fund will be depleted, as demonstrated below, and as presented to the Board in September 2025 when the 2026 Budget was approved by the Board:

Year	Revenue	Expenses	Surplus / Deficit	Operating Fund	Reserves
2021	\$2,410,180	\$2,287,700	\$122,480	\$1,238,343	\$2,070,000
2022	\$2,396,599	\$2,104,428	\$292,171	\$1,609,405	\$2,070,000
2023	\$2,477,679	\$2,247,328	\$230,351	\$1,773,070	\$2,070,000
2024	\$2,540,361	\$2,716,665	-\$176,304	\$1,673,374	\$2,070,000
2025 *	\$2,545,982	\$2,936,033	-\$390,051	\$1,196,309	\$2,070,000
2026 **	\$2,529,000	\$2,549,261	-\$20,261	\$1,176,048	\$2,070,000
2027 **	\$2,529,000	\$2,884,091	-\$355,091	\$820,957	\$2,070,000
2028 **	\$2,529,000	\$2,970,600	-\$441,600	\$379,357	\$2,070,000

As is the case when the proposed budget is presented to the Board at the September meeting, in accordance with the Board’s Executive Limitations Policy EL II-10: Financial Health, revenue projections are conservative, while expense predictions are more liberal.

On the revenue side, extrapolation based on previous year’s is determined to be the standard. The number of CMLTO Registrants has increased over the past three years and is expected to continue to trend in that direction due to the number of new graduates projected over the next three years. However, there still exists a risk of loss of Registrants due to age-based attrition.

On the expense side, after a period of savings from 2021 to 2023 based on building of internal capacity (and less reliance on consultants), the costs of running the CMLTO continue to climb based primarily on staffing costs and an increased number and complexity of regulatory cases at the CMLTO.



As noted above, the CMLTO is currently one of, if not the leanest and most efficient RHPA Colleges in Ontario. However, looking forward, the current revenues will not be sufficient to meet future requirements.

In accordance with the Board's Executive Limitations Policy EL II-10: Financial Health, the Board will receive the Registrar & CEO's 2027 Budget Assumptions in June 2026. A fulsome budget will then be presented to the Board at the September meeting. This will include detailed financial modelling for the short, medium and long term to ensure the financial health of the CMLTO.

### **Governance Implications**

Financial capacity is a critical enabler of the CMLTO's ability to achieve the Board's Ends (Critical Outcomes) Policies. The availability, stability, and flexibility of financial resources directly influence the scope, quality, and sustainability of regulatory activities and services as well as strategic directions. A well-aligned financial model ensures that resources are sufficient to meet current obligations while also supporting emerging priorities and responding to changes in demand or external conditions. Conversely, constraints in financial capacity may require trade-offs that affect service levels, timeliness, or the organization's ability to proactively address risks, or to deliver on strategic directions and opportunities. Understanding this relationship allows for a more informed consideration of whether the current and projected financial trajectory appropriately supports the achievement of the organization's stated outcomes over the medium and long term.

Within this context, clearly defined and appropriately calibrated Board policies play a central role in managing financial risk. Policies related to reserves, revenue generation, and financial conditions establish the boundaries within which the Registrar & CEO may operate, while also signaling the Board's tolerance for risk, variability, and uncertainty. Well-crafted policies provide sufficient direction to safeguard financial sustainability without constraining the flexibility required for effective management. Where policies lack clarity or do not fully reflect the Board's values, or the CMLTO's evolving financial realities, there is a risk of either unintended exposure or unnecessary restriction. Ongoing attention to the adequacy and alignment of these policies is therefore essential to ensuring that financial risks are managed prudently in support of the organization's Ends (Critical Outcomes) Policies.

### **Conclusion & Generative Discussion**

Although the CMLTO is in a health financial position this year and is projected to be within the next two years, it is clear that medium and long-term financial health is at risk, requiring an increase in revenue to sustain operations, deliver on regulatory requirements, and achieve the Board's Ends (Critical Outcomes) Policies.



This will be addressed through the usual budget approval cycle as described in this briefing report and as proscribed by the Board's Executive Limitations Policy EL II-10: Financial Health.

In understanding the current and future financial health of the CMLTO, the Board should continue to consider the following questions:

- 1. To what extent do our current financial policies (e.g., on reserves, revenue generation, and financial conditions) adequately define and protect the organization's long-term financial sustainability?**
- 2. Are our stated Ends (Critical Outcomes) Policies achievable within the financial trajectory outlined, and do our policies provide clear guidance on the acceptable balance between financial capacity and desired outcomes?**
- 3. What level of financial risk or variability is acceptable within our policies, and where might greater clarity be required to guide future decision-making?**

The first and third questions will continue to be assessed and addressed by the Board through the regular policy review process. The second question related to Ends (Critical Outcomes) Policies achievement will become important and central in the coming year as the Board embarks on a refresh of the Ends (Critical Outcomes) Policies for 2028.



## AGENDA ITEM 4.0

4.0	ADJOURNMENT
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College of Medical  
Laboratory Technologists  
of Ontario

**THANK YOU FOR YOUR ATTENDANCE**